22 December 2022 ERM Reference No. 0506713

Mr. Josiah Johnson Remedial Project Manager – Fulton Avenue Superfund Site New York Remediation Branch United States Environmental Protection Agency, Region II 290 Broadway New York, NY 10007-1866

Re: Third Quarter 2022 Progress Report

150 Fulton Avenue NPL Site - Operable Unit I USEPA Consent Judgment No. CV-09-3917

DOJ Ref. No. 90-11-2-09329

Garden City Park Industrial Site NYSDEC#130073

Dear Mr. Johnson:

On behalf of Genesco Inc. (Settling Defendant), this letter transmits the Third Quarter 2022 (July – September) Progress Report for the Fulton Avenue Superfund Site (Site).

OPERABLE UNIT 1 REMEDIAL DESIGN & INTERIM REMEDIAL ACTION

During the reporting period, remedial action (RA) activities continued as specified in the U.S. Environmental Protection Agency's (EPA) 30 September 2015 Amended Operable Unit One (OU1) Record of Decision (ROD) for the Site. The OU1 Remedial Design (RD) and RA activities (the Work) are being implemented in accordance with the 2016 OU1 Consent Judgment (2016 CJ) and 2016 OU1 Statement of Work (2016 SOW) approved by the Court on 15 August 2016, and the EPA-approved 2017 OU1 RD Work Plan.

During 2016-2018, remedial design (RD) activities were completed and concluded with EPA's approval of the OU1 RD Report on 25 March 2019. During 2019-2020, an OU1 Remedial Action (RA) Report was prepared, submitted to, and approved by EPA on 13 November 2020. Remaining OU1 RA activities for which the Settling Defendant is responsible are:

- Long-term groundwater monitoring and reporting (Table 1 & Figure 1) and maintenance of the associated groundwater monitoring wells; and
- The sub-slab depressurization/venting system (SSDS) at the 150 Fulton Avenue property.

The Incorporated Village of Garden City (VGC) operates public supply Well Nos. 13 & 14 and the associated air stripper treatment systems, which are not under the Settling Defendant's control.

Long-Term Groundwater Monitoring

The long-term groundwater monitoring program commenced in September 2017 following EPA approval of the OU1 RD Work Plan, and is currently being implemented in accordance with the:

- 2016 CJ:
- Schedule provided in Attachment 1 of the 2016 SOW: Monitoring Well Sampling Program (see attached Table 1);
- EPA-approved 2017 Quality Assurance Project Plan (QAPP) for the Site; and
- OU1 RA Schedule (Figure 3 of the OU1 Site Management Plan (SMP)).



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Long-term groundwater monitoring well network locations are shown on the map presented as Figure 1.

The results of the last (tenth) sampling event completed during 30 August – 2 September 2021 for Group 1 wells (GCP-01/01D, 08, 15S, 18S/18D, MWs- 15 A-B, 20 A-C, 22 A-C, 23 A-D) wells were transmitted to EPA in the Third Quarter 2021 Progress Report.

150 Fulton Avenue Sub-Slab Depressurization System (SSDS)

Monthly drive-by checks confirm the SSDS fan continues to operate.

VGC Water Supply Well Monitoring

The VGC continued operations and maintenance (O&M), monitoring and protection (treatment) of VGC water supply wells 13 and 14. The VGC provided a new set of sampling results and pumpage records for VGC water supply wells 9, 13 and 14 for the period of July – September 2022.

The pumpage records indicate Well No. 13 was used as the primary supply well during January 2022 – September 2022 while in contrast, Well No. 14 was operated little during the same period. According to the VGC, influent (raw) water samples were not collected from Well No. 14 during April 2021 – September 2022. Nearby Well No. 9 was operated very little between the summer of 2017 and May of 2020, intermittently during June 2020 – November 2020, little during December 2020 – April 2021, but has operated regularly during May 2021 - September 2022 with a slight drop-off between February 2022 and April 2022.

The new data were incorporated into the existing database and used to update corresponding charts for the Well Nos. 13 & 14 showing PCE and TCE concentrations versus time, and historic monthly pumpage versus time to evaluate recent contaminant concentration trends depicted in the same. The updated charts for Well Nos. 13 & 14 are presented as Figures 2 & 3, respectively.

Figure 4 presents average concentrations of PCE and TCE (and the corresponding PCE/TCE ratio) for each of the three wells by year (2001 – 2021), and plots of average annual PCE and TCE concentrations versus time for each of the three wells for comparison. The data and resultant plots indicate that concentrations of PCE have fluctuated over time since 2007, but both maximum observed and annual average concentrations of PCE have been declining over time in Well Nos. 13 & 14. A brief summary is presented in the table below that puts the relative concentrations in perspective.

| VGC Well | Dominant Compound Historic High | 2007 Average (µg/L) | 2021 Average (µg/L) | Differenceof Averages | % Change of Averages |
|------------------|---------------------------------------|---------------------------|---------------------------|--------------------------|----------------------------|
| No. 13 (N-07058) | 6/4/2007 | | | | |
| PCE | 1,020 | 722.6 | 283.5 | -439.1 | -61% |
| TCE | 91.5 | 90.0 | 35.4 | -54.6 | -61% |
| No. 14 (N-08339) | 10/27/2007 | | | | |
| PCE | 769 | 370.1 | 367 | -3.1 | -1% |
| TCE | 69 | 38.9 | 21.5 | -17.4 | -45% |

UPCOMING ACTIVITIES

Long-Term Groundwater Monitoring

Long-term groundwater monitoring of Group 2 (MWs 21A-D) and Group 3 wells (MWs 26A-H, 27A-H, 28A-H) will continue in early October 2022 in accordance with the annual sampling schedule established in the 2016 SOW (Table 1) and indicated in the OU1 RA Schedule (Figure 3 of the Site Management Plan). Year 5 sampling does not include

Group 1 wells (GCP-01/01D, 08, 15S, 18S/18D, MWs- 15 A-B, 20 A-C, 22 A-C, 23 A-D) wells.

150 Fulton Avenue Sub-Slab Depressurization System (SSDS)

Continued monthly checks to confirm the SSDS fan is operating.

VGC Water Supply Well Monitoring

A new set of sampling and pumpage records for VGC water supply wells 9, 13, and 14 for October 2022 through December 2022 will be obtained, and the updated charts and tables will be presented in the Fourth Quarter 2023 Progress Report in January 2023.

If you should have any questions or wish to discuss the content of this progress report, please do not hesitate to call me at (631) 756-8920.

Sincerely,

Chris W. Wenczel, P.G.

Consulting Director/Hydrogeologist

Attachments

cc: Attachments

cc: Andrea Leshak, Esq., USEPA

Damian Duda, USEPA Matthew Silverman, USDOJ

Steven M. Scharf, P.E., NYSDEC

John Swartwout, NYSDEC Scott Becker, Genesco Inc. Thor Urness, Esq., Bradley Jeff Sheehan, Esq., Bradley

James Periconi, Esq., Periconi, LLC

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TABLES

Table 1
OU1 Long-Term Monitoring Well Sampling Program
Fulton Avenue Superfund Site
Garden City Park, New York



Per 2016 SOW Attachment 1: Monitoring Well Sampling Program

Group 1 Wells are as follows:

GCP-01 S/D GCP 08 GCP-18 S/D GCP-15S MW15 A-B MW20 A-C

MW22 A-C

MW23 A-D

Group 1 Wells shall be sampled and analyzed at the following frequency:

The first sampling round shall commence within 20 days of EPA approval of the RD Work Plan, and sampling shall be performed every 24 months thereafter.

Group 2 Wells are as follows:

MW21 A-D

Group 2 Wells shall be sampled and analyzed at the following frequency:

Year 1 – quarterly, to commence approximately 30 days after completion of construction of MW21 D and MW28 A-H

Year 2 – semi-annually (every six months)

Year 3 – semi-annually (every six months)

Year 4 – no sampling and analysis

Year 5 (and beyond) – once in year 5 and every 24 months thereafter.

Group 3 Wells are as follows:

MW26 A-H

MW27 A-H

MW28 A-H

Group 3 Wells shall be sampled and analyzed at the following frequency:

Year 1 – quarterly, to commence approximately 30 days after completion of construction of MW21 D and MW28 A-H

Year 2 –9 of 24 zones with EPA approval of the specific zones, semi-annually (every six months)

Year 3 – 9 of 24 zones with EPA approval of the specific zones, semi-annually (every six months)

Year 4 – no sampling and analysis

Year 5 (and beyond) – once in year 5 and every 24 months thereafter.



FIGURES

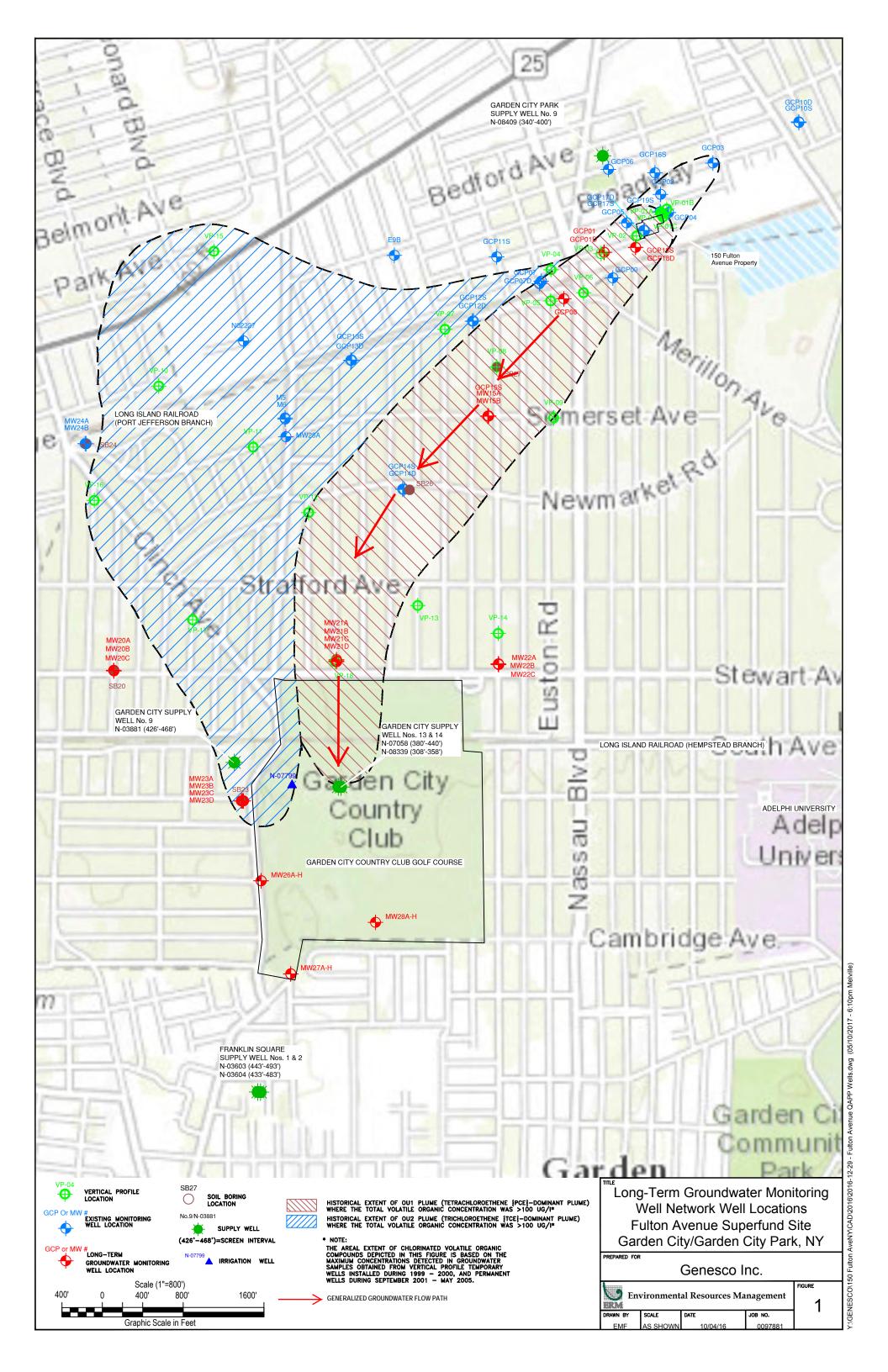


FIGURE 2
HISTORICAL TETRACHLOROETHENE & TRICHLOROETHENE CONCENTRATIONS AND MONTHLY WELL PUMPAGE: JANUARY 2007 - SEPTEMBER 2022
PUBLIC WATER SUPPLY WELL # N-07058 (GARDEN CITY WELL NO. 13), GARDEN CITY, NEW YORK

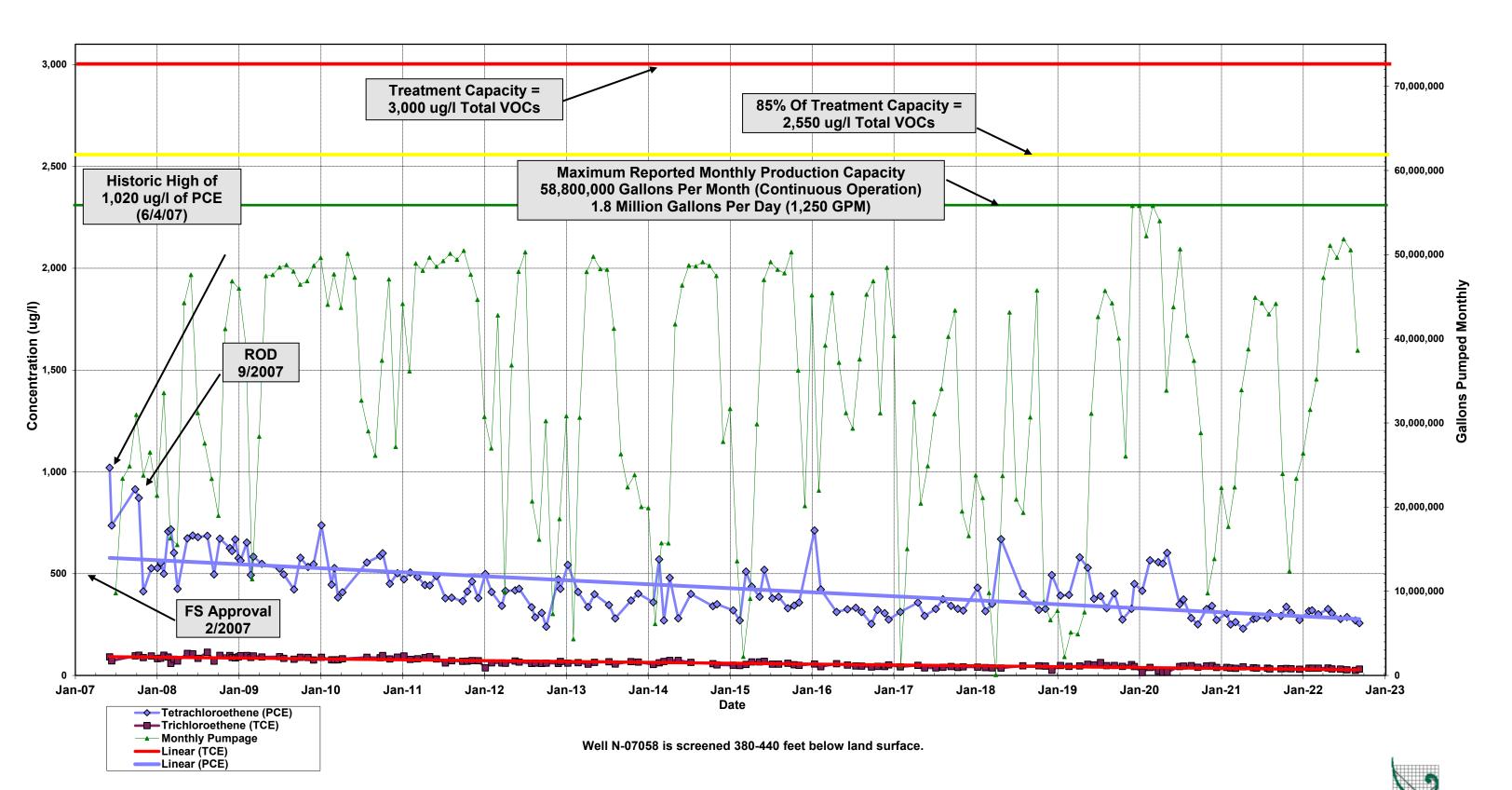


FIGURE 3
HISTORICAL TETRACHLOROETHENE & TRICHLOROETHENE CONCENTRATIONS AND MONTHLY WELL PUMPAGE: JANUARY 2007 - SEPTEMBER 2022
PUBLIC WATER SUPPLY WELL # N-08339 (GARDEN CITY WELL NO. 14), GARDEN CITY, NEW YORK

