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Mr. Josiah Johnson
Remedial Project Manager
Fulton Avenue Superfund Site
New York Remediation Branch
USEPA Region II
290 Broadway, 20th Floor
New York, NY 10007-1866

DATE
14 October 2024

SUBJECT
Third Quarter 2024 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

REFERENCE
0560713

Dear Mr. Johnson:

On behalf of Genesco Inc. (Settling Defendant), this letter transmits the Third Quarter 2024 (July – September) Progress Report for the Fulton Avenue Superfund Site (Site).

OPERABLE UNIT 1 REMEDIAL DESIGN & INTERIM REMEDIAL ACTION OBLIGATIONS

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, RD activities were completed and concluded with EPA's approval of the OU1 RD Report on 25 March 2019. During 2019-2020, an OU1 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 for volatile organic compounds (VOCs) and maintenance of the associated groundwater monitoring wells; and
- The operation and maintenance of the sub-slab depressurization/venting system (SSDS) at the 150 Fulton Avenue property located in the Garden City Park Industrial Area (GCPIA).

In addition, EPA made two additional requests during 2024 that were fulfilled during the reporting period:

- EPA's 10 January 2024 letter[1] requested, and the Settling Defendant conditionally agreed to a one-time sampling event to collect groundwater samples from a select group of 16 groundwater monitoring wells (located only within OU1) for emerging contaminant analyses (per- and polyfluoroalkyl substances [PFAS] and 1,4-dioxane) [2].
- EPA's 31 May 2024 letter[3] requested, and the Settling Defendant agreed to assist EPA by developing a summary report that presents information and analyses that demonstrate the OU1 Interim Remedy is meeting the Remedial Action Objectives (RAOs) established in the 2015 OU1 Amended 2015 ROD)[4].

[1] 10 January 2024 letter from Andrea Leshak, EPA Assistant Regional Counsel to Thor Y. Urness, Bradley (outside counsel for Genesco).

[2] 29 January 2024 letter from Thor Y. Urness, Bradley (outside counsel for Genesco) to Andrea Leshak, EPA Assistant Regional Counsel.

[3] 31 May 2024 letter from Andrea Leshak, EPA Assistant Regional Counsel to Thor Y. Urness, Bradley (outside counsel for Genesco).

[4] 7 June 2024 email from Thor Y. Urness, Bradley (outside counsel for Genesco) to Andrea Leshak, EPA Assistant Regional Counsel.

ACTIONS COMPLETED THIS REPORTING PERIOD

Long-Term Groundwater Monitoring for VOCs & Emerging Contaminant Sampling

The long-term groundwater monitoring program for volatile organic compounds (VOCs) commenced in September 2017 following EPA approval of the OU1 RD Work Plan (currently in Year 7), and is 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 2024 updated Quality Assurance Project Plan (QAPP) for the Site[5]; and
- OU1 Site Management Plan (SMP).

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

The annual long-term groundwater VOC monitoring event has normally been performed during the August-September timeframe, but is not stipulated for any specific month of the year. The 2024 long-term VOC monitoring and the one-time emerging contaminant sampling events were combined into one mobilization for efficiency/cost management and completed during June 2024.

The thirteenth sampling event was completed during 17 – 21 June 2024 that included the collection of 37 groundwater samples for VOC analysis and 16 groundwater samples for PFAS and 1,4-dioxane analyses (plus quality assurance/quality control (QA/QC) samples) using low-flow sampling methodologies from the following monitoring wells:

- Group 2 (4 wells): MWs 21A-D;
- Group 3 (3 multi-level wells: 8 zones or 24 samples): MWs 26A-H, 27A-H, and 28A-H; and
- Additional wells designated by the EPA (9 wells): GCPs 01, 03, 06, 10D/S, MWs 15A, and 22A-C).

All 37 groundwater samples and associated QA/QC samples were analyzed for 52 Target Analyte List VOCs using EPA Method 8260D. The 16 groundwater samples collected from monitoring wells GCP10D, GCP10S, GCP03, GCP06, GCP01, MW-15A, MW21A, MW21B, MW21C, MW21D, MW22A, MW22B, MW22C, MW-28A, MW-28F andMW-28H were analyzed for a list of 40 PFAS using EPA Method 1633, and 1,4-dioxane using EPA Method 8270E SIM (selective ion monitoring).

The validated results and accompanying analyses of the data set were presented to EPA in the 23 August 2024 Second Quarter Progress Report.

150 Fulton Avenue Sub-Slab Depressurization System (SSDS)

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

OU1 Interim Remedy Effectiveness Evaluation Technical Memorandum

The 19 July 2024 OU1 Interim Remedy Effectiveness Evaluation Technical Memorandum presented summary evaluations of six topics specified in EPA's 31 May 2024 Letter Request. The evaluations presented there in conclude, for a number of reasons that the OU1 Interim Remedy is meeting the 2015 OU1 ROD Amendment RAOs of minimizing and/or eliminate the potential for future human exposure to Site contaminants via contact with contaminated drinking water; and helping to reduce migration of contaminated groundwater.

[5] EPA's 10 January 2024 letter required update of the EPA-approved 2017 QAPP to include relevant information for sampling and analysis of groundwater samples for PFAS and 1,4-dioxane. The document was approved by EPA (23 May 2024 email from Josiah Johnson, EPA Remedial Project Manager) allowing ERM to move forward with the combined June 2024 annual long-term groundwater monitoring and the one-time emerging contaminant sampling event.

VGC Water Supply Well Monitoring

The VGC operates public Supply Well Nos. 13 & 14 and the associated air stripper/granular-activated carbon (GAC) treatment systems, which are not under the Settling Defendant's control.

The VGC continued operations and maintenance (O&M), monitoring and protection (treatment) of VGC public Supply Well Nos. 13 & 14. The VGC provided a new set of sampling results and pumpage records for VGC water Supply Well Nos. 9, 13 and 14 for the period of July 2024 – September 2024.

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 historical 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.

The pumpage records indicate Well No. 14 was used as the primary Supply well during April 2024 – June 2024. According to the VGC, influent (raw) water samples were collected from all three Supply wells during April 2024 – June 2024. Nearby Well No. 9 was operated regularly during April 2024 – June 2024.

Figure 4 presents average concentrations of PCE and TCE (and the corresponding PCE/TCE ratio) for Well Nos. 9, 13, & 14 by year (2001 – 2023), and plots of average annual PCE and TCE concentrations versus time for each of well 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. Concentrations of TCE have been declining in Well No. 13 and are beginning to decline in Well No. 14. A brief summary that puts the relative concentrations in perspective is presented in the table below:

VGC Well	Dominant Compound Historical	2007 Average (µg/L)	2023 Average (µg/L)	Difference of Averages	% Change of Averages
No. 13 (N-07058)	**6/4/2007**				
PCE	1,020	722.6	345.0	-377.6	-52%
TCE	91.5	90.0	32.1	-57.9	-64%
No. 14 (N-08339)	**10/27/2007**				
PCE	769	370.1	308.8	-61.3	-17%
TCE	69	38.9	28.1	-10.8	-28%

UPCOMING ACTIVITIES

Long-Term Groundwater Monitoring

Long-term groundwater monitoring of Group 1 (GCP01/01D, 08, 15S, 18S/18D, MWs 15A-B, 20A-C, 22A-C, and 23A-D) will continue in September 2025 in accordance with the annual sampling schedule established in the 2016 SOW (**Table 1**) and indicated in the OU1 Site Management Plan. Year 8 sampling does not include Group 2 (MWs 21A-D) or Group 3 (MWs 26A-H, 27A-H, and 28A-H) groundwater monitoring 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 public Supply Well Nos. 9, 13 & 14 for October 2024 – December 2024 will be obtained, and the updated charts and tables will be presented in the Fourth Quarter 2024 Progress Report in October 2024.

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.

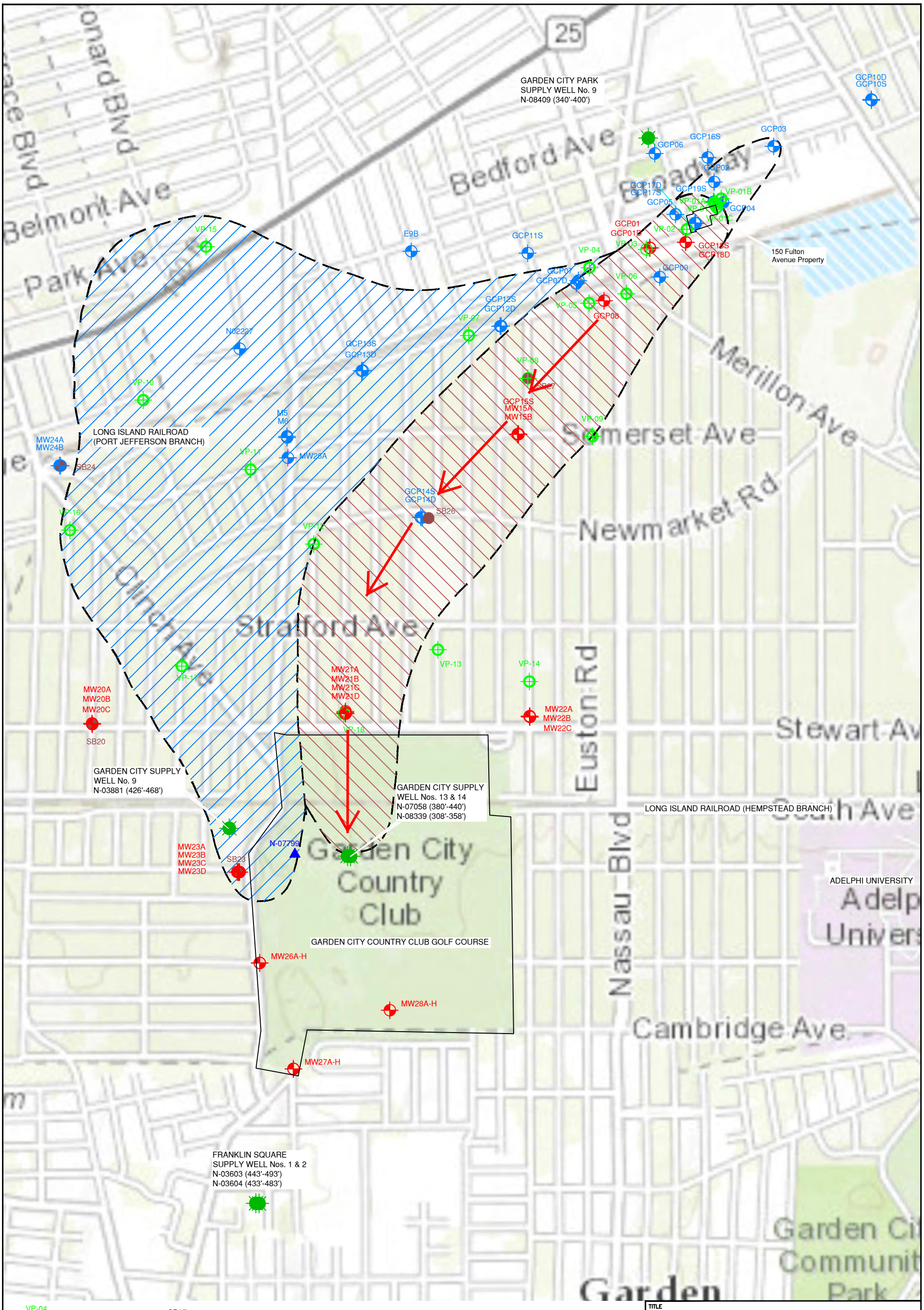
Sincerely,

Chris W. Wenczel, P.G. (NY)
Director/Hydrogeologist/Project Coordinator
ERM Consulting & Engineering, Inc.

Attachments

cc: Andrea Leshak, Esq., USEPA
Damian Duda, USEPA
Matthew Silverman, USDOJ
Steven M. Scharf, P.E., NYSDEC
John Swartwout, NYSDEC
Scott Becker, Esq., Genesco Inc.
Tracy Pelham, Esq., Genesco Inc.
Thor Urness, Esq., Bradley
Caroline Spore, Esq., Bradley
Ernie Rossano, P.G. (NY), ERM Consulting & Engineering, Inc.

FIGURES



VP-04 VERTICAL PROFILE LOCATION

GCP Or MW # EXISTING MONITORING WELL LOCATION

GCP or MW # LONG-TERM GROUNDWATER MONITORING WELL LOCATION

SB27 SOIL BORING LOCATION

No.9/N-03881 SUPPLY WELL (426'-468')=SCREEN INTERVAL

N-07799 IRRIGATION WELL

HISTORICAL EXTENT OF OU1 PLUME (TETRACHLOROETHENE {PCE}-DOMINANT PLUME) WHERE THE TOTAL VOLATILE ORGANIC CONCENTRATION WAS >100 UG/l*

HISTORICAL EXTENT OF OU2 PLUME (TRICHLOROETHENE {TCE}-DOMINANT PLUME) WHERE THE TOTAL VOLATILE ORGANIC CONCENTRATION WAS >100 UG/l*

* NOTE:
THE AREAL EXTENT OF CHLORINATED VOLATILE ORGANIC COMPOUNDS DEPICTED IN THIS FIGURE IS BASED ON THE MAXIMUM CONCENTRATIONS DETECTED IN GROUNDWATER SAMPLES OBTAINED FROM VERTICAL PROFILE TEMPORARY WELLS INSTALLED DURING 1999 - 2000, AND PERMANENT WELLS DURING SEPTEMBER 2001 - MAY 2005.

GENERALIZED GROUNDWATER FLOW PATH

Scale (1"=800')
400' 0 400' 800' 1600'
Graphic Scale in Feet

TITLE
Long-Term Groundwater Monitoring Well Network Well Locations Fulton Avenue Superfund Site Garden City/Garden City Park, NY

PREPARED FOR
Genesco Inc.

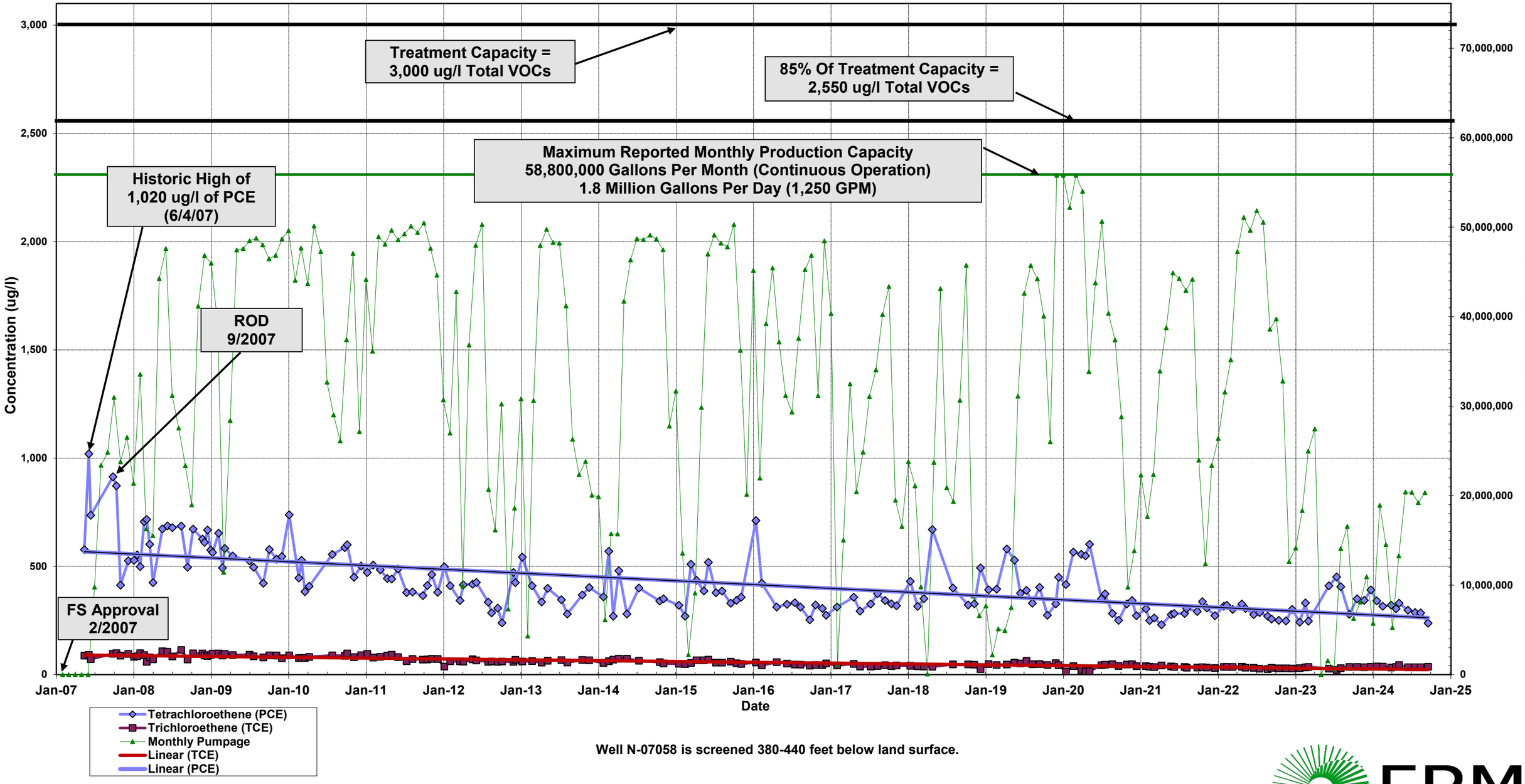
Environmental Resources Management
ERM

FIGURE 1

DRAWN BY	SCALE	DATE	JOB NO.
EMF	AS SHOWN	10/04/16	0097881

Y:\GENESCO\150 Fulton Ave\NYCAD\2016\2016-12-29 - Fulton Avenue QAPP Wells.dwg (05/10/2017 - 6:10pm Melville)

FIGURE 2
HISTORICAL TETRACHLOROETHENE & TRICHLOROETHENE CONCENTRATIONS AND MONTHLY WELL PUMPAGE: JANUARY 2007 - SEPTEMBER 2024
PUBLIC WATER SUPPLY WELL # N-07058 (GARDEN CITY WELL NO. 13), GARDEN CITY, NEW YORK



Well N-07058 is screened 380-440 feet below land surface.

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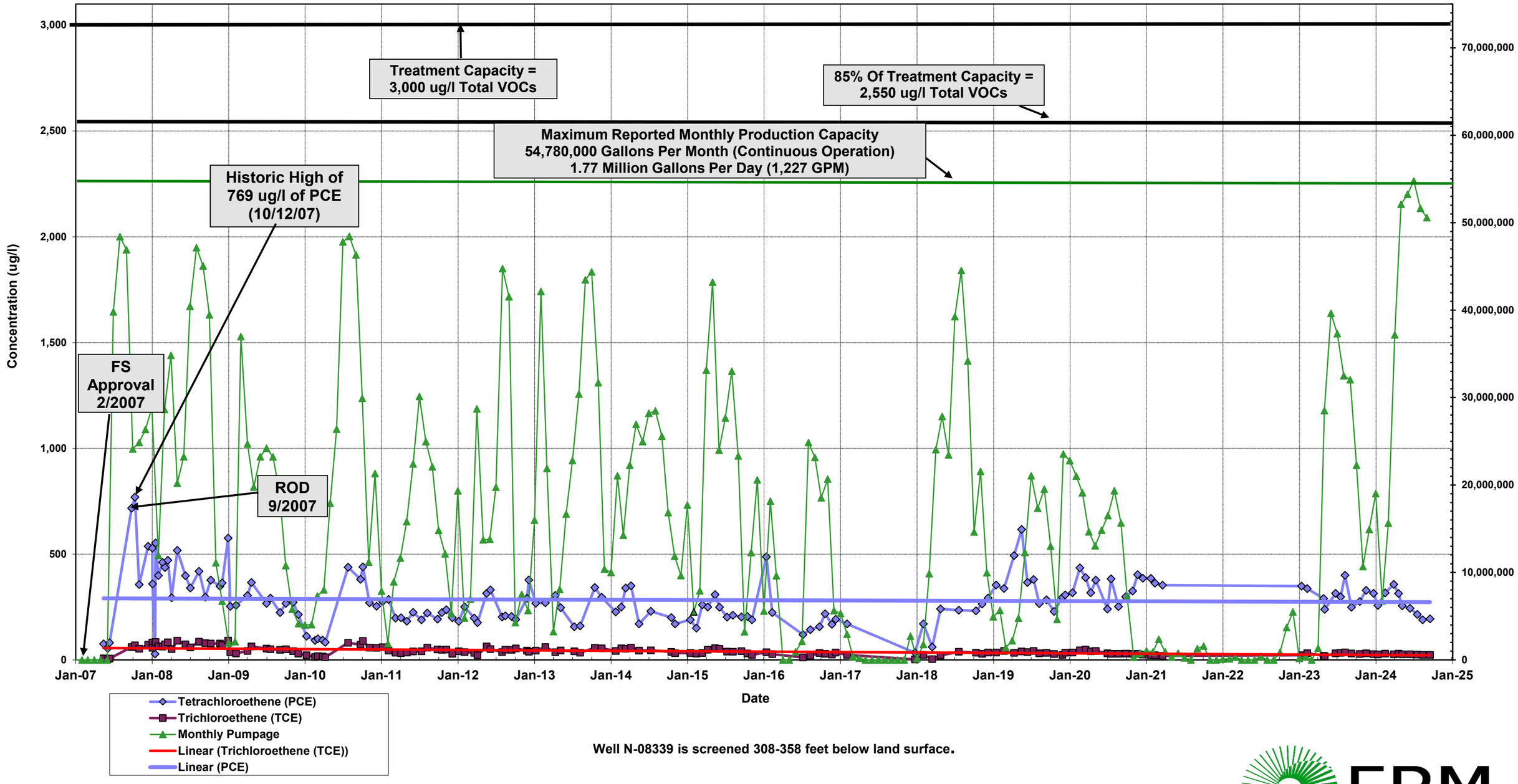
FIGURE 3
HISTORICAL TETRACHLOROETHENE & TRICHLOROETHENE CONCENTRATIONS AND MONTHLY WELL PUMPAGE: JANUARY 2007 - SEPTEMBER 2024
PUBLIC WATER SUPPLY WELL # N-08339 (GARDEN CITY WELL NO. 14), GARDEN CITY, NEW YORK



Well N-08339 is screened 308-358 feet below land surface.

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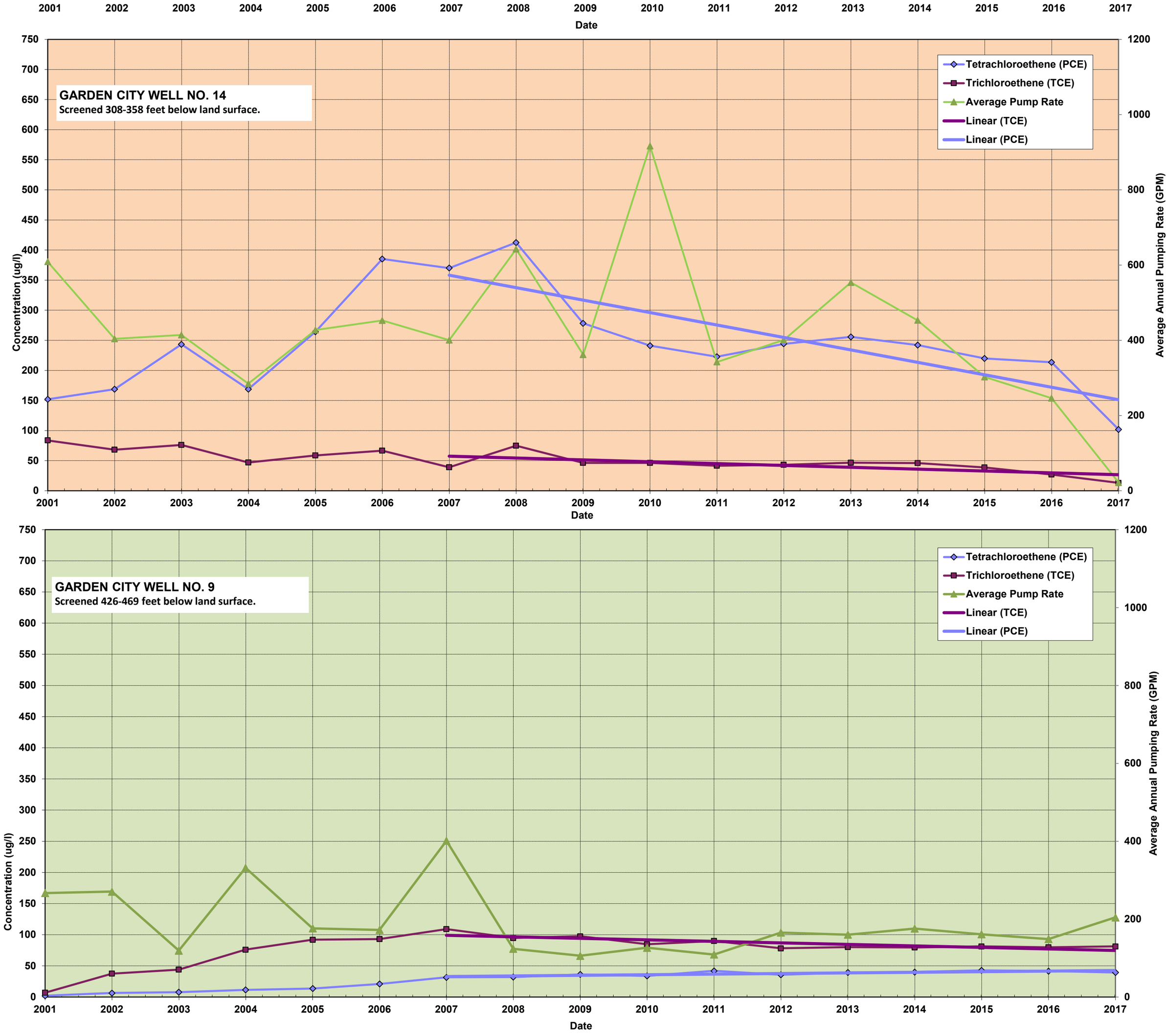
TABLE 1
HISTORIC AVERAGE TETRACHLOROETHENE AND TRICHLOROETHENE CONCENTRATIONS BY YEAR 2001 - 2015
GARDEN CITY PUBLIC WATER SUPPLY WELL NOS. 9, 13 14, GARDEN CITY, NEW YORK

	Year	2001		2002		2003		2004		2005		2006		2007		2008		2009		2010		2011		2012		2013		2014		2015		2016		2017	
	Compound	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE
Well No. 13 (N-07058)	Average Concentration	128.0	57.8	211.8	67.0	271.7	59.0	263.6	65.3	335.0	73.9	488.3	85.8	722.6	90.0	603.4	88.5	539.5	90.3	508.3	86.1	454.3	80.2	345.4	59.7	385.5	62.5	381.1	63.4	385.1	57.1	357.0	48.3	331.3	41.6
	Ratio PCE/TCE	2.2		3.2		4.6		4.0		4.5		5.7		8.0		6.8		6.0		5.9		5.7		5.8		6.2		6.0		6.7		7.4		8.0	
	Average Pump Rate	412.1		277.8		268.2		243.8		477.4		472.1		265.0		699.6		953.1		916.8		1078.9		644.0		749.1		791.3		733.0		873.0		607.2	
Well No. 14 (N-08339)	Average Concentration	152.0	83.6	168.7	68.2	243.3	76.2	168.6	46.9	264.2	58.6	385.0	66.5	370.1	38.9	412.4	75.0	278.1	46.3	241.2	46.2	222.8	41.7	244.1	43.1	255.8	46.6	242.1	45.9	219.9	38.8	213.6	27.1	102.0	13.1
	Ratio PCE/TCE	1.8		2.5		3.2		3.6		4.5		5.8		9.5		5.5		6.0		5.2		5.3		5.7		5.5		5.3		5.7		7.9		8.0	
	Average Pump Rate	608.8		271.0		414.2		284.9		427.3		452.6		400.4		642.4		361.9		916.8		342.3		400.9		553.9		453.0		302.7		246.0		22.0	
Well No. 9 (N-03881)	Average Concentration	2.1	7.0	6.6	37.5	7.9	44.0	11.6	76.0	13.7	92.0	21.0	93.0	31.6	109.0	32.0	94.8	36.4	97.5	33.9	84.6	42.0	90.0	35.7	78.1	39.5	80.2	40.1	79.6	42.8	81.2	41.8	79.8	39.4	81.2
	Ratio PCE/TCE	0.3		0.2		0.2		0.2		0.1		0.3		0.3		0.3		0.4		0.4		0.5		0.5		0.5		0.5		0.5		0.5		0.5	
	Average Pump Rate	267.0		271.0		119.2		331.7		176.4		172.3		401.2		123.9		106.1		126.5		109.1		165.4		160.2		175.8		161.0		148.9		204.4	

Concentrations are in ug/l (ppb).



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.