FINAL
DECISION DOCUMENT

Camp Hero
Formerly Used Defense Site

Montauk, New York

FUDS Project Number: C02NY002403

October 2022

U.S. Army Corps of Engineers – New England District

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Acronyms and Abbreviations

ACWS	Aircraft Control and Warning Squadron
amsl	above mean sea level
AOC	Areas of Concern
AP	armor piercing
AST	aboveground storage tank
bgs	below ground surface
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
COC	chemicals of concern
COPC	chemicals of potential concern
CSM	Conceptual Site Model
CWS	Community Water Supplies
DD	Decision Document
DERP	Defense Environmental Restoration Program
DoD	Department of Defense
DU	decision unit
ERA	ecological risk assessment
FOIA	Freedom of Information Act
FPS	Fixed-Pulse Radar Surveillance
FS	Feasibility Study
FUDS	Formerly Used Defense Site
HE	high explosive
HHRA	human health risk assessment
HHRE	human health risk evaluation
HHSE	human health screening evaluation

HTW	Hazardous and Toxic Waste
lb	pound
LNAPL	light non-aqueous phase liquid
MCL	Maximum Contaminant Level
mm	millimeter
NCP	National Contingency Plan
NCWS	Non-Community Water Supplies
NFA	No Further Action
NGWA	National Groundwater Association
NRHP	National Register of Historic Places
NY	New York
NYS	New York State
NYSDEC	NYS Department of Environmental Conservation
NYSDOH	NYS Department of Health
NYSOPRHP	NYS Office of Parks, Recreation, and Historic Preservation
OE	Ordnance and Explosives
PAH	polycyclic aromatic hydrocarbons
PCB	polychlorinated biphenyls
PP	Proposed Plan
RAO	remedial action objective
RI	Remedial Investigation
SCDHS	Suffolk County Department of Health Services
SEA	stream exposure area
SL	screening levels
SVOC	semi-volatile organic compound
UGA	Upper Glacial Aquifer
USACE	United States Army Corps of Engineers
USC	United States Code
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
UST	underground storage tank
UU/UE	unlimited use and unrestricted exposure
VI	vapor intrusion
VISL	vapor intrusion screening levels
VOC	volatile organic compound

1. PART 1: DECLARATION

1.1 SITE NAME, LOCATION

The Camp Hero Formerly Used Defense Site (FUDS), also referred to as "The Site", is a 461-acre New York State Park (Camp Hero State Park) located at the eastern end of Long Island at Montauk Point, in Montauk, New York (NY). The Site is currently owned by NY State (NYS) and operated by the NYS Office of Parks, Recreation, and Historic Preservation (NYSOPRHP).

1.2 STATEMENT OF BASIS AND PURPOSE

This Decision Document (DD) presents the Selected Remedy for the Site in accordance with Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan, more commonly known as the National Contingency Plan (NCP). This decision is based on the Administrative Record file for this site. NYS concurs with the Selected Remedy.

1.3 DESCRIPTION OF THE SELECTED REMEDY

The selected remedy for the Site is No Further Action (NFA) based on the results of the Remedial Investigation (RI) completed in 2019 and the subsequent RI Addendum completed in 2022, which determined that there was no actionable risk to human or ecological receptors (USACE, 2019a and 2022).

1.4 STATUTORY DETERMINATIONS

The Selected Remedy is protective of human health and the environment, and it complies with Federal and State requirements that are applicable or relevant and appropriate to the remedial action. Because this remedy allows for unlimited use and unrestricted exposure (UU/UE) for the reasonably anticipated future use[1], a statutory review every five years per 40 CFR 300.430(f) (4) (ii) is not required.

[1] Residential development is not an anticipated future use.

1.5 AUTHORIZING SIGNATURES

This DD presents the final decision for soil, sediment, surface water, shallow perched groundwater, and deep aquifer groundwater. The Department of Defense (DoD) is the lead agency under the Defense Environmental Restoration Program (DERP) at the Camp Hero FUDS. The Army is the executive agent on behalf of DoD charged with meeting applicable environmental restoration requirements at FUDS. Program management and execution responsibility for FUDS have been delegated to the United States Army Corps of Engineers (USACE), and the USACE has developed this DD for DoD. This DD is consistent with the CERCLA, as amended, and the NCP. This document will be incorporated into the Administrative Record file for the Camp Hero FUDS, which is available for public view at the Public Repository for this project at the Montauk Public Library, 871 Montauk Highway, Montauk, NY 11954 as well as the USACE New England District office located at 696 Virginia Road, Concord, Massachusetts, 01742.

This document, presenting a selected remedy with a total cost to complete estimate recorded in the FUDS Management Information System of $0, is approved by the undersigned and pursuant to the delegated authority in the Assistant Secretary of the Army (Installations, Energy and Environment) memorandum dated 25 May 2022 subject: Assignment of Mission Execution Functions Associated with DoD Lead Agent Responsibilities for the FUDS Program, and subsequent re- delegations.

Date:

Name: REINHARD W. KOENIG, P.E., SES
Programs Director

North Atlantic Division

KOENIG.REINHARD.WOLFRAM.1162741418

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2. PART 2: DECISION SUMMARY

2.1 PROJECT NAME, LOCATION, AND DESCRIPTION

The Camp Hero FUDS is a 461-acre site located at the eastern end of Long Island at Montauk Point, in Montauk, NY (see **Figure 2-1**). The Site is currently owned by NYS and operated as Camp Hero State Park (referred to hereafter as "the Park") by the NYSOPRHP. The Park is bound by Montauk Highway (Route 27) to the north, the Atlantic Ocean to the south, Montauk Point State Park to the east, and an undeveloped sanctuary area to the west (see **Figure 2-2**).

It should be noted that this DD excludes Areas H and K of Camp Hero, which are military munitions sites that will undergo CERCLA investigation on a different timeline. The Camp Hero FUDS includes abandoned infrastructure from the FUDS activities, such as buildings, bunkers, water well enclosures, and a radio tower. Two FUDS buildings have been converted into active NYS Park infrastructure: vehicle maintenance and park officer residence buildings.

The overall former Camp Hero facility includes the following current landowners:

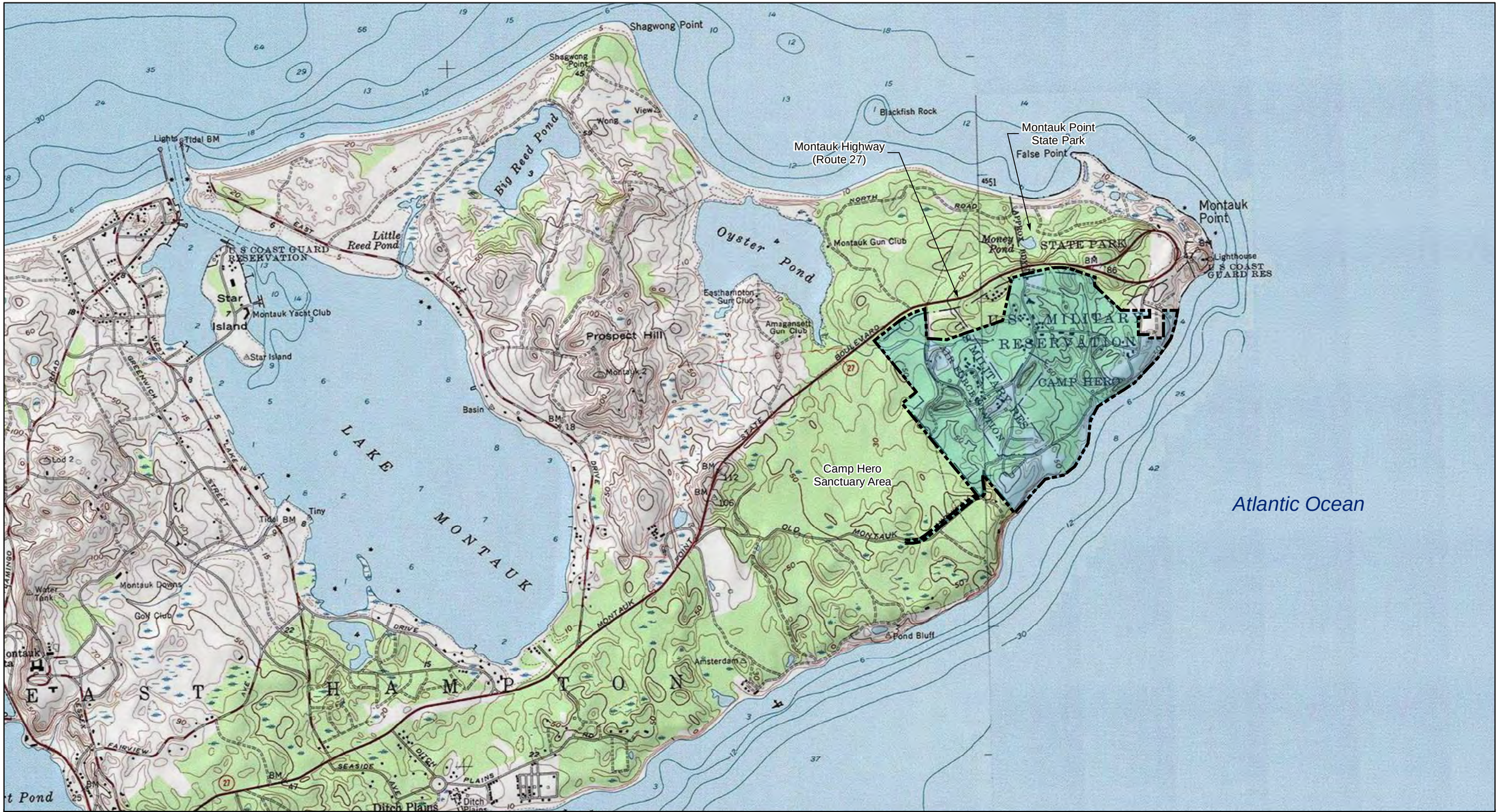
- NYSOPRHP (415 acres)
- Town of East Hampton (46 acres)

The majority of the former Camp is owned by NYSOPRHP and is operating as the Camp Hero State Park, a public recreational area (USACE, 2003).

2.2 PROJECT HISTORY AND REGULATORY REQUIREMENTS

The former Camp Hero was established in early 1942 as a Coastal Defense Installation to defend the approaches to NY and was named in honor of Major General Andrew Hero. Three self-sufficient batteries (Battery 112, 113, and 216) and supporting facilities were constructed and included barracks, mess halls, hospital facilities, a motor repair shop (current Motor Pool building), a recreation facility, sentry boxes, and water supply and sewage facilities. A total of 600 enlisted men and 37 officers were stationed at Camp Hero (USACE, 2000).

Camp Hero was a sub-installation of the 11th Coast Artillery Regiment (Harbor Defense) located at Fort H.G. Wright, Fishers Island, Block Island Sound, NY. Fort H.G. Wright was under the



MAP LOCATION

Camp Hero Built Features

Camp Hero State Park Boundary

NAD 1983 StatePlane Long Island FIPS 3104

Basemap Copyright© 2013 National Geographic Society, i-cubed

N
W E
S

0 1,000 2,000 Feet

1 inch = 2,000 feet

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General Location Map

Camp Hero Decision Document
Montauk, New York

PROJECT NO.	PREPARED BY:	DATE:	
60443903	JB	July 2018	**Figure 2-1**

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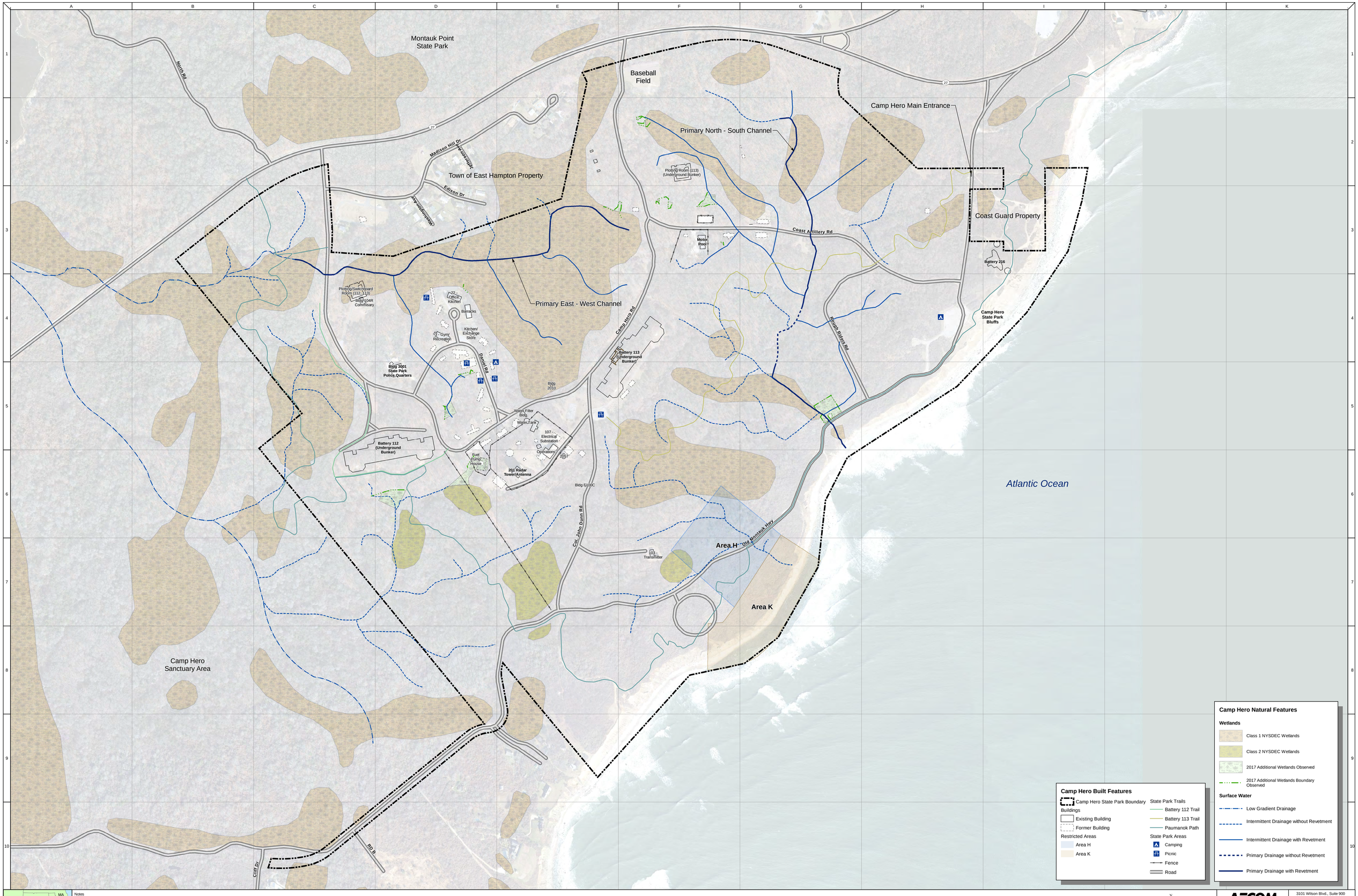

Camp Hero Built Features

- Camp Hero State Park Boundary
- Buildings
  - Existing Building
  - Former Building
- Restricted Areas
  - Area H
  - Area K
- State Park Trails
  - Battery 112 Trail
  - Battery 113 Trail
  - Paumanok Path
- State Park Areas
  - Camping
  - Picnic
- Fence
- Road

Camp Hero Natural Features

Wetlands

- Class 1 NYSDEC Wetlands
- Class 2 NYSDEC Wetlands
- 2017 Additional Wetlands Observed
- 2017 Additional Wetlands Boundary Observed

Surface Water

- Low Gradient Drainage
- Intermittent Drainage without Revetment
- Intermittent Drainage with Revetment
- Primary Drainage without Revetment
- Primary Drainage with Revetment

MAP LOCATION

Notes
1. No wetland conditions observed within DU boundary of DU01, DU12, or DU18.
2. Wetlands were evaluated only within Decision Units.

N W E S

0 125 250 500 Feet

1 inch = 250 feet

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Site Map

Camp Hero Decision Document
Montauk, New York

PROJECT NO.	PREPARED BY	DATE	
60443903	JB	October 2018	**Figure 2-2**

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control of the Eastern Defense Command. Elements from the 11th Coast Artillery Regiment, along with elements from the 242nd Connecticut National Guard Coast Artillery Regiment (Harbor Defense), augmented the 11th Coast Artillery Regiment at Fort H.G. Wright (USACE, 2000).

Battery 216 contained two 6-inch shielded guns, a mechanical power room, and powder room for storage of ammunition and powder charges. Battery 113 consisted of two 16-inch casemated guns, and battle allowances of ammunition and powder charges were stored within the battery. Battle allowances of ammunition and powder charges for the Camp Hero battery guns were stored within the individual batteries at the site. War reserve allowances of ammunition for the batteries were also required; however, this ammunition was stored outside of Camp Hero installation boundaries at an unknown central depot location under the control of the Chief of Ordnance. Batteries 112 and 113 had a battle allowance of 200 16-inch, 2,240-pound (lb) projectiles and a war reserve allowance of 300 16-inch, 2,240-lb projectiles. Battery 216 had a battle allowance of 200 6-inch, 90-lb high explosive (HE) rounds and 300 6-inch, 105-lb armor piercing (AP) rounds, and a war reserve allowance of 300 6-inch, 90-lb HE rounds and 400 6-inch, 105-lb AP rounds (USACE, 2000).

Additionally, 37-millimeter (mm) weapons and 0.50-caliber antiaircraft weapon platoons were assigned to protect Camp Hero from air attack. Camp Hero's weaponry was periodically fired to practice over water but was never fired as an act of hostility. It is presumed that the antiaircraft weapon ammunition for Camp Hero and nearby facilities was also stored within the battery ammunition storage facilities of Camp Hero, as no other historical or physical evidence is present to display a separate storage facility for these items. This organization was assumed to be possible due to the storage capacity of 400 rounds of ammunition in Batteries 112 and 113 and a battle allowance requirement of only 200 rounds of ammunition (USACE 2000).

Camp Hero was placed on inactive status on 31 July 1947 and ultimately declared surplus by the Department of the Army on 31 December 1949. In 1949, approximately 97 acres of the former Camp Hero were transferred to the Department of the Air Force for an aircraft control and warning station. On 24 January 1951, the former Camp Hero was withdrawn from surplus and designated for use as a firing range and field exercise area for an antiaircraft artillery unit from Fort Totten,

NY. Arrangements were made for an Army cadre at the Site, and 90 mm and quad 0.50 caliber antiaircraft artillery began firing exercises from firing positions established in the southern bluff overlooking the Atlantic Ocean near Bunker 216. Tow target planes and radio-controlled aircraft were used to gauge firing accuracy; towed barges were also later used. Due to limited facilities for the training units, the units bivouacked at Camp Hero. Ammunition for training exercises, when required, was stored in the internal bunkers of the now unused Battery 216 (USACE, 2000).

In 1952, the Air Force property was renamed the Montauk Air Force Station and occupied by the Aircraft Control and Warning Squadron (ACWS). The facility was active until October 1958, when the ACWS was re-designated as the Radar Squadron with a new mission to provide surveillance data of air traffic in the area. To accomplish this mission, an advanced Specific Frequency Diversity Search Radar was built in late 1960 (AN/FPS-35 Radar Tower and Antenna).

In 1974, when some of the on-site military uses were still active, portions of the property were transferred from the DoD to NYS. With the departure of the last military personnel from the site in 1980, the DoD declared the remainder of the property to be surplus federal land. Over the next few years, the property was divided and deeded to NYS and Town of East Hampton. The ACWS facility was permanently closed in 1982, and the final land transfer to the state occurred in 1984.

The former Camp Hero is now used as Camp Hero State Park, owned by NYS, and operated under the jurisdiction of the NYSOPRHP. In 2002, the AN/FPS-35 Radar Tower and Antenna was listed under the National Register of Historic Places (NRHP). Camp Hero State Park, as a whole, is potentially eligible for listing on the NRHP according to the NYS Historic Preservation Office.

2.2.1 Prior Investigations and Studies

Multiple environmental investigations have been conducted at the Site for the purpose of identifying environmental concerns, risk, and/or hazards associated with the former defense site. The investigations are summarized below.

2.2.1.1 Pre-Remedial Investigation

Previous investigations at Camp Hero included underground storage tank (UST) and aboveground storage tank (AST) closures and reports, focused site assessments, and sitewide surveys and reports. Key reports that provide historical data for Camp Hero are briefly summarized below:

- UST and AST Registration and Closure Reports. All USTs and ASTs have been removed at Camp Hero except for two USTs and two ASTs that are currently in-use by non-DOD entities. The USTs and ASTs with reported petroleum releases and respective NYSDEC spill case numbers are in closed status.

- Building 203 Site Assessment Report (USACE, 1994). The 1994 Site Assessment Report documents the excavation of former diesel USTs 16 and 18 at former Building 203, where 2,500 yards of diesel-impacted soil were removed. Geoprobe® borings were advanced around and within the excavation, and confirmatory soil and groundwater samples were collected. The results of the soil and groundwater samples were below screening criteria. The Spill Report Case was closed by the NYSDEC in July 1995.

- Feasibility Study (FS) and Hazardous Materials Survey Preliminary Report (Cashin Associates, 1998). The 1998 Camp Hero FS and Hazardous Materials Survey Preliminary Report identified several areas that had an actual or potential Hazardous and Toxic Waste (HTW) presence based on the presence of former military buildings and refuse found onsite. In addition to the HTW, projectile fragments were discovered along the southern bluffs of the Site (Area K) and indicated the potential presence of ordnance and explosives (OE). The 1992 study did not collect any analytical samples, except for one sample collected in an area of oil staining under electrical equipment in Battery 113 that was analyzed for polychlorinated biphenyls (PCBs). The electrical equipment has since been removed.

- Data Collection Report (Westin, 2000). The 2000 Data Collection Report investigated potential soil and water contamination within select areas at Camp Hero in support of a decision regarding whether further environmental action were required. Concrete chip,

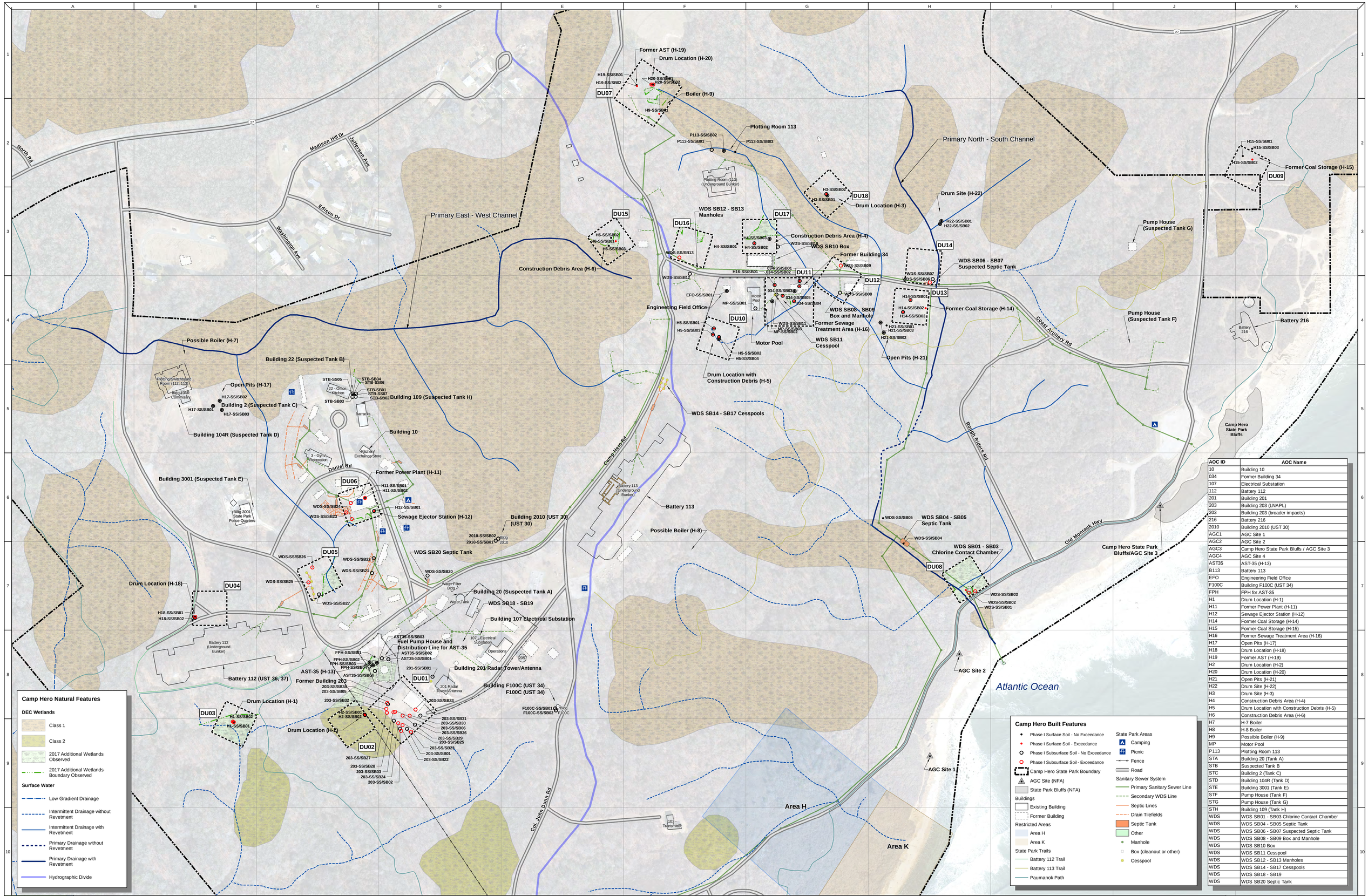
surface and subsurface soil, groundwater, and sediment samples were collected and compared against applicable regulatory criteria or guidelines. Conclusions from the investigation determined that PCBs levels in the concrete provided no significant human health or ecological threats via migration and below regulatory levels in surface soils. Subsurface soil samples at the former Power Plant indicated elevated levels of beryllium, while groundwater samples indicated elevated levels of chromium and lead.

Since 2000, the USACE has been conducting various OE investigations in Areas H and K, which are excluded from this DD. However, for reference, ordnance explosive and non-ordnance scrap was removed from Area H and part of Area K in 2003.

2.2.1.2 Remedial Investigation

An RI was completed at Camp Hero from 2015 to 2019 to identify and summarize the nature and extent of potential releases and impacts in site media from former military operations, and to subsequently quantify whether unacceptable risks are posed to human health or ecological receptors associated with exposure to constituents from these historical operations. A historical records review was conducted in 2015 as part of the RI that identified 45 potential Areas of Concern (AOCs) at Camp Hero; two additional AOCs were identified in 2016, for a total of 47 AOCs as shown in **Figure 2-3**. These AOCs included former waste disposal and coal storage areas, abandoned drum locations, formerly documented and alleged USTs and ASTs, a Motor Pool building, and other areas associated with historical DoD operations. Previous investigations at Camp Hero have included UST and AST closures and reports, focused site assessments, and sitewide surveys and reports.

The RI field effort was completed in three phases; the Phase I field investigation was completed from May to June 2016, the Phase II field investigation was completed from November to December 2016, and the Phase III field investigation was completed from May to June 2017. Approximately 1,300 soil, sediment, surface water, and groundwater samples were collected during the three RI field events. The Phase I field investigation included the collection of soil, sediment, surface water, groundwater, and surface/chip samples throughout the initial 47 AOCs. Background soil samples were also collected in areas of Camp Hero FUDS where former activities



Camp Hero Natural Features

DEC Wetlands

- Class 1
- Class 2
- 2017 Additional Wetlands Observed
- 2017 Additional Wetlands Boundary Observed

Surface Water

- Low Gradient Drainage
- Intermittent Drainage without Revetment
- Intermittent Drainage with Revetment
- Primary Drainage without Revetment
- Primary Drainage with Revetment
- Hydrographic Divide

Camp Hero Built Features

- Phase I Surface Soil - No Exceedance
- Phase I Surface Soil - Exceedance
- Phase I Subsurface Soil - No Exceedance
- Phase I Subsurface Soil - Exceedance
- Camp Hero State Park Boundary
- AGC Site (NFA)
- State Park Bluffs (NFA)

Buildings
- Existing Building
- Former Building

Restricted Areas
- Area H
- Area K

State Park Trails
- Battery 112 Trail
- Battery 113 Trail
- Paumanok Path

State Park Areas
- Camping
- Picnic
- Fence
- Road

Sanitary Sewer System
- Primary Sanitary Sewer Line
- Secondary WDS Line
- Septic Lines
- Drain Tilefields
- Septic Tank
- Other
- Manhole
- Box (cleanout or other)
- Cesspool

AOC ID	AOC Name
10	Building 10
034	Former Building 34
107	Electrical Substation
112	Battery 112
201	Building 201
203	Building 203 (LNAPL)
203	Building 203 (broader impacts)
216	Battery 216
2010	Building 2010 (UST 30)
AGC1	AGC Site 1
AGC2	AGC Site 2
AGC3	Camp Hero State Park Bluffs / AGC Site 3
AGC4	AGC Site 4
AST35	AST-35 (H-13)
B113	Battery 113
EFO	Engineering Field Office
F100C	Building F100C (UST 34)
FPH	FPH for AST-35
H1	Drum Location (H-1)
H11	Former Power Plant (H-11)
H12	Sewage Ejector Station (H-12)
H14	Former Coal Storage (H-14)
H15	Former Coal Storage (H-15)
H16	Former Sewage Treatment Area (H-16)
H17	Open Pits (H-17)
H18	Drum Location (H-18)
H19	Former AST (H-19)
H2	Drum Location (H-2)
H20	Drum Location (H-20)
H21	Open Pits (H-21)
H22	Drum Site (H-22)
H3	Drum Site (H-3)
H4	Construction Debris Area (H-4)
H5	Drum Location with Construction Debris (H-5)
H6	Construction Debris Area (H-6)
H7	H-7 Boiler
H8	H-8 Boiler
H9	Possible Boiler (H-9)
MP	Motor Pool
P113	Plotting Room 113
STA	Building 20 (Tank A)
STB	Suspected Tank B
STC	Building 2 (Tank C)
STD	Building 104R (Tank D)
STE	Building 3001 (Tank E)
STF	Pump House (Tank F)
STG	Pump House (Tank G)
STH	Building 109 (Tank H)
WDS	WDS SB01 - SB03 Chlorine Contact Chamber
WDS	WDS SB04 - SB05 Septic Tank
WDS	WDS SB06 - SB07 Suspected Septic Tank
WDS	WDS SB08 - SB09 Box and Manhole
WDS	WDS SB10 Box
WDS	WDS SB11 Cesspool
WDS	WDS SB12 - SB13 Manholes
WDS	WDS SB14 - SB17 Cesspools
WDS	WDS SB18 - SB19
WDS	WDS SB20 Septic Tank

Notes
1. No wetland conditions observed within DU boundary of DU01, DU12, or DU18.
2. Wetlands were evaluated only within Decision Units.

MAP LOCATION

0 75 150 300 Feet

1 inch = 150 feet

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Areas of Concern and Decision Units
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Montauk, New York

PROJECT NO.	PREPARED BY:	DATE	Figure 2-3
60443903	JB	January 2022	

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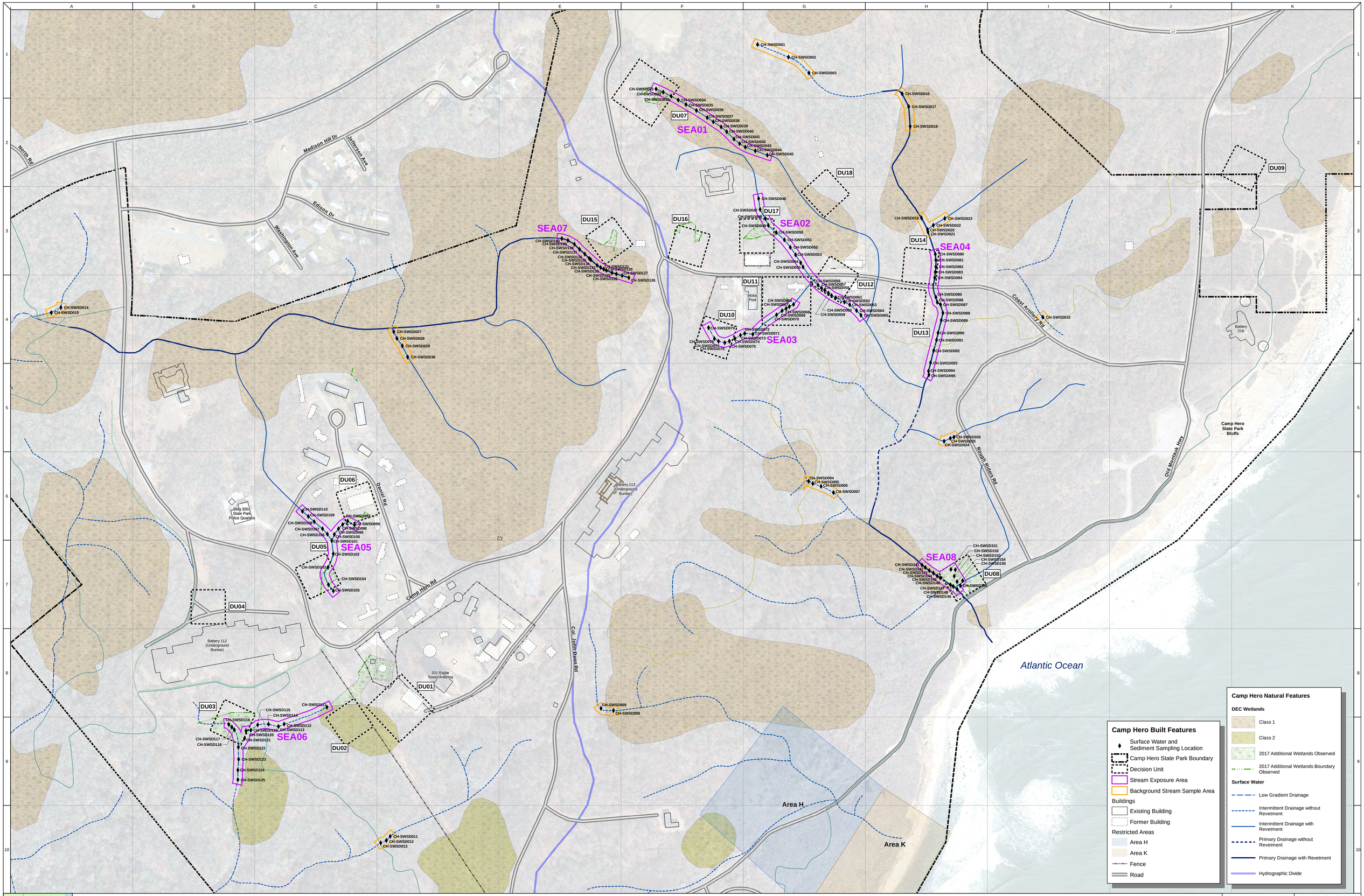
were limited or non-existent, such as heavily forested, undeveloped land. The analyses performed varied between AOCs based on the reasons for concern at that AOC and included volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), energetics (munitions), PCBs, and metals. A Preliminary Screening Evaluation was completed after completion of the Phase II investigation using the Phase I and II data to determine whether any of the AOCs required further assessment as part of the Phase III RI field effort.

A total of 25 AOCs were determined to warrant NFA. The remaining 22 AOCs were grouped into 18 geometric decision units (DUs) for the Phase III field investigation, as shown in **Figure 2-4**. Streams in the vicinity of the DUs were grouped into eight stream exposure areas (SEAs) for the assessment of surface water and sediment.

The Phase III RI field investigation was accomplished by collecting an unbiased, representative dataset for surface and subsurface soil within each DU and surface water and sediment within each SEA. The investigation also included the collection of sitewide groundwater samples and background surface water and sediment. The Phase III effort was specifically designed to support the risk assessments and address data gaps from previous phases.

The sitewide groundwater sampling and evaluation in the RI focused on the perched groundwater lenses to assess whether groundwater were impacted by historical activities associated with the DUs. The 43 monitoring wells installed to support this evaluation had total depths ranging from 15 to 40 feet below ground surface (bgs), and the depth to groundwater in these wells ranged from 6 to 28 feet bgs across the site. The shallow perched groundwater at Camp Hero is unsuitable for drinking based on the perched groundwater characteristics and Suffolk County drinking water well standards. The deeper aquifer that is used for drinking water is known as the Upper Glacial Aquifer (UGA). The RI did not investigate the UGA, as it was concluded at that time that the significant depth of the aquifer (80 feet or more below the perched water lenses) and the documented presence of a competent confining layer precluded the potential for any historical release from Camp Hero FUDS activities to have impacted the UGA.



Notes
1. No wetland conditions observed within DU boundary of DU01, DU12, or DU18.
2. Wetlands were evaluated only within Decision Units.

MAP LOCATION

Camp Hero Built Features

- Surface Water and Sediment Sampling Location
- Camp Hero State Park Boundary
- Decision Unit
- Stream Exposure Area
- Background Stream Sample Area

Buildings
- Existing Building
- Former Building

Restricted Areas
- Area H
- Area K
- Fence
- Road

Camp Hero Natural Features

DEC Wetlands
- Class 1
- Class 2
- 2017 Additional Wetlands Observed
- 2017 Additional Wetlands Boundary Observed

Surface Water
- Low Gradient Drainage
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- Hydrographic Divide

0 75 150 300 Feet
1 inch = 150 feet

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Stream Exposure Areas
Camp Hero Decision Document
Montauk, New York

PROJECT NO:	PREPARED BY:	DATE:	
60443903	JB	January 2022	Figure 2-4

9/10/2018 1:1,800 \\USCHL1FP001\Data\Projects\Govt\Projects\USACE\Camp_Hero\GIS\Projects\RI_Report\MXD\Fig_2_5_Site_Map_Surface_Water_Sediment_Sampling Loc.mxd

The Final RI Report was completed in February 2019 and concluded that there was no actionable risk to human or ecological receptors within any of the DUs or SEAs (USACE, 2019a). Thus, the recommendation was NFA under the CERCLA program. The RI Report provided a comprehensive evaluation of all data collected. Baseline human health and ecological risk assessments were completed, which included:

- Comparisons of media concentrations of chemicals against applicable human health or ecological screening levels (SLs) and site-specific background threshold values,
- Quantitative risk calculations,
- UU/UE evaluation
- Site and background population means comparison,
- Geochemical statistical evaluation for metals, and
- Additional characterization of polycyclic aromatic hydrocarbons (PAHs), including forensics and source evaluation.

Based on these evaluations, there were no chemicals of concern (COCs) identified that could be attributed to a CERCLA release or at concentrations presenting actionable risk. The UU/UE evaluation determined that UU/UE was appropriate for the entire Camp Hero FUDS, excluding Areas H and K. It should be noted that COCs in perched groundwater presented actionable risk to a hypothetical future resident using this groundwater for potable uses; however, this was not considered in the UU/UE evaluation or human health risk conclusions as perched groundwater is prohibited for potable use by the local Suffolk County Health Department. Due to the discontinuous nature and low water quality of the perched groundwater, potable water can only be obtained from the deeper UGA in Suffolk County. Per the CERCLA process, no further assessment or response action was deemed to be warranted for any DU, SEA, or sitewide groundwater. The NYSDEC concurred with the NFA recommendation and approved the RI in 2019 (NYSDEC, 2019). A copy of regulator comments and approval is provided in **Appendix A**.

While petroleum is exempt under CERCLA, it should be noted that residual light non-aqueous phase liquid (LNAPL) was identified in the subsurface at the former Building 203 (DU01) during the RI. Two large USTs and associated contaminated soils at Building 203 were previously

removed in 1993 under a USACE contract. A sample of the LNAPL was submitted for fingerprint analysis during the RI and was found to be consistent with weathered diesel/Number 2 fuel oil. Data collected during the RI field investigation delineated the vertical and horizontal extent of LNAPL. The data also indicated the LNAPL is stable (i.e., immobile) and not recoverable, and natural processes are depleting the LNAPL source mass. Despite the presence of LNAPL, COCs representing human health and ecological risk under CERCLA were not identified for applicable receptors in soil, groundwater, surface water, or sediment associated with DU01. The NFA conclusion for the Camp Hero FUDS included DU01, as COCs presenting risk were not identified.

Although petroleum is exempt under CERCLA, USACE voluntarily worked with the NYSDEC to evaluate the LNAPL in the perched groundwater at the former Building 203 (DU01). A NYSDEC Spill Number (PC-1602757) was opened, and a Technical Memorandum was prepared under the NYSDEC Spills Response Program in accordance with Article Twelve of the NYS Navigation Law. The Technical Memorandum concluded that NFA was appropriate for the LNAPL at Building 203 based on the 1993 site remediation efforts (over excavation and off-site disposal of soil at the UST locations), LNAPL stability, lack of mobility/recoverability, and evidence of active source depletion. The Technical Memorandum was approved by the NYSDEC and the NYSDEC Spill Number was subsequently closed in 2019 (see **Appendix A**).

2.2.1.3 Proposed Plan

The USACE issued a Proposed Plan (PP) in October 2019 indicating that NFA is appropriate for all media throughout Camp Hero FUDS (USACE, 2019b). Note that Areas H and K were not included in the PP, as they were identified as former military munitions sites that are currently following their own path in the CERCLA process; thus, these two sites were excluded from the sitewide RI. The PP was issued in coordination with support agencies consisting of the NYSDEC, NYSDOH, and NYSOPRHP. The USACE hosted a public meeting for the PP in October 2019 and invited interested members of the public to comment on the PP during a 45-day public comment period from 1 October 2019 to 15 November 2019. Public concerns were raised relative to the potential for impacts from historical activities at Camp Hero to drinking water located in the UGA. The comments received during the public comment period and at the public meeting are

summarized in the Responsiveness Summary, which is contained in Part 3.0 of this DD. Stakeholder comments to the PP are provided in **Appendix A**.

2.2.1.4 Remedial Investigation Addendum

Although the regulatory stakeholders concurred with NFA presented in the RI, USACE decided to conduct a limited assessment of the potential for Camp Hero FUDS activities to have impacted the UGA. This effort was initiated to address community concerns based on comments received prior to and during the public meeting conducted during the PP phase. The RI Addendum included an additional field effort, which is referred to as Phase IV of the RI. The primary goal of the Phase IV RI was to determine if there were any historical DoD releases that could have impacted the UGA.

The Phase IV RI included the following five main activities:

1) A well reconnaissance and synoptic gauging event was conducted for six offsite and eight onsite wells screened within the UGA in the vicinity of Camp Hero. Three rounds of synoptic water level gauging were completed to refine the understanding of the groundwater flow direction in the UGA.

2) Deep boreholes were advanced in the UGA, and continuous soil sampling was conducted to document the lithology and hydrogeologic units at two locations between area of known subsurface impacts at DU01 and potential receptors (drinking water wells) along Old Montauk Highway, to the southwest of Camp Hero. Soil samples were analyzed for geotechnical parameters (grain size and percent moisture) to support understanding of lithologic units. The depth of the UGA and well screen intervals for two permanent nested monitoring wells were determined using lithology of the borings at each location.

3) DU01 is a 1.0-acre area at Camp Hero established during the RI Quality Assurance Project Plan (USACE, 2017) to assess potential impacts from former Building 203 and associated USTs. The purpose of establishing DU01 was to provide a realistic exposure area surrounding Building 203 and the USTs that is representative for both human health and ecological receptors risk analysis. Data from DU01 and the other 17 DUs were compared

with Phase IV RI data to determine if historical DoD activities at Camp Hero have impacted UGA groundwater between known subsurface impacts associated with DU01 and potential receptors (drinking water wells) along Old Montauk Highway, to the southwest of Camp Hero.

4) Four new permanent monitoring wells were installed in two locations in the south-southwest corner of Camp Hero, between DU01 and the closest potential human receptors along Old Montauk Highway. The four new wells consist of two well pairs, one in the shallow portion of the UGA, and one in the deeper horizon to mimic the depths of the older and newer drinking water wells servicing the private residences along Old Montauk Highway, respectively. In addition to the four newly installed wells, three existing UGA wells within Camp Hero boundary and seven offsite UGA wells were viable for groundwater sample collection.

5) Two rounds (December 2020 and February 2021) of groundwater samples were collected from seven onsite and seven offsite UGA monitoring wells. The samples were analyzed for a comprehensive list consisting of 71 VOCs, 49 SVOCs, 17 PAHs, 9 PCBs, and 26 metals to evaluate the deep aquifer at and in the vicinity of Camp Hero. In total, each sample collected was analyzed for 172 unique constituents.

Analytical data were evaluated consistent with the previous phases of the RI. Data were first screened against the most conservative published screening criteria. Four metals (barium, iron, manganese, and sodium) are either not CERCLA hazardous constituents or are essential nutrients and were not compared to SLs. Thus, these metals were eliminated as groundwater chemicals of potential concern (COPCs) prior to the screening level step. The data were compared to human health SLs to determine if the potential for unacceptable risk levels exist, as well as complete a statistical comparison of data to local groundwater conditions to evaluate levels of naturally occurring constituents (such as arsenic and barium).

A human health screening evaluation (HHSE) was completed on the constituents that exceeded the most conservative criteria consistent with the HHSE screening completed for the non-potable

overburden onsite groundwater. The HHSE used risk-based SLs, standard exposure parameters, and toxicity factors. This evaluation was conducted to determine the potential for adverse health effects due to the most conservative risk, which is based on a hypothetical resident's exposure to tap water. The goal of the HHSE was to determine if constituents attributable to historical DoD activities at Camp Hero were present in the UGA groundwater at concentrations that would produce unacceptable risk to a hypothetical future onsite resident, current and future offsite residents living southwest of Camp Hero, and the public that visits the Montauk Point State Park and the Montauk Lighthouse and Museum located northeast and adjacent to Camp Hero.

The HHSE treated the onsite and offsite groundwater data as separate study areas. In addition, each monitoring well was treated as its own drinking water source. Risk-based screening and a cumulative screen evaluation were conducted for the onsite study area, offsite study area, and for each onsite and offsite well (i.e., well-by-well evaluation).

The tap water SLs addressed the following groundwater-related exposure pathways: ingestion of drinking water, dermal contact, and inhalation of vapors (if volatile groundwater COPCs]were identified). Also, USEPA residential vapor intrusion SLs (VISLs) were used to conservatively evaluate the potential for vapor intrusion (VI). The risk-based screening results identified one chemical, chloroform, as a potential groundwater VI COPC; however, the cumulative screening evaluation results were acceptable (i.e., below the USEPA cumulative cancer risk and non-cancer hazard thresholds of 1E-04 and 1, respectively). Thus, VI was eliminated as a groundwater pathway of concern.

The HHSE did not identify any adverse health effects from drinking water from the UGA groundwater for onsite hypothetical residents, constituent offsite residents living southwest of Camp Hero, and the public at the Montauk Point State Park and the Montauk Lighthouse and Museum located northeast and adjacent to Camp Hero. Thus, UU/UE was established for the deep aquifer groundwater.

The conclusions provided in the RI Addendum Report were: (1) metals with relatively high results are naturally occurring and non-hazardous CERCLA (barium, iron, and manganese), (2) the

remaining constituents were detected at low concentrations, with mostly spatial distribution throughout onsite and offsite wells, (3) determining if the source of detected constituents is from DoD activities is difficult to determine due to 40+ years of elapsed time since Camp Hero FUDS was operational, natural degradation for some constituents such as VOCs, and the relative immobility of others (SVOCs, PAHs, and PCBs), (4) spatial distribution of constituents between onsite and offsite wells indicates strong potential source from widespread use of septic drain fields throughout Montauk Point and/or general anthropogenic releases, and (5) none of the detected constituents presented actionable risk. Thus, based on this limited deep groundwater aquifer investigation, the NFA determination that was recommended at the conclusion of the RI remained appropriate for Camp Hero under CERCLA.

2.2.2 Regulatory Background

The DoD has the responsibility to remediate former DoD facilities under the DERP for FUDS and, therefore, is responsible for making the final determination for Camp Hero FUDS. The USACE goal is to achieve regulatory closure for the Site. FUDS program policy requires USACE to:

- Comply with DERP, CERCLA, the NCP, and Army policies for the FUDS program;
- Coordinate with the lead regulator, which is NYSDEC;
- Conduct an RI with a baseline risk assessment to evaluate the need for remediation; and
- Attain standards and meet requirements that are consistent with CERCLA and NCP processes and criteria.

Site investigation and remediation activities must follow federal laws, guidance, and methods. The NYSDEC has participated by providing regulatory oversight of the FUDS investigations. The RI, RI Addendum, and PP were conducted under the DERP for FUDS, and performed in accordance with the CERCLA and NCP.

2.3 COMMUNITY PARTICIPATION

The scope of community participation activities performed was consistent with the USEPA CERCLA guidance for community involvement (USEPA, 2016), Section 300 of the NCP, and USACE guidance contained in Engineering Pamphlet 200-3-1 (USACE, 2011).

USACE completed the following activities as part of its public outreach effort:

- Provided project reports including the Final RI/FS Report to an information repository located at the Montauk Public Library in Montauk, NY, the USACE NY District office located at 26 Federal Plaza, Room 1811, New York, NY 10278, and online at https://www.nan.usace.army.mil/FUDS/Camp-Hero-Reports/.

- Solicited public comment on the PP (USACE, 2019b). The PP was made available to the public at the same locations as noted above.

- Conducted a public meeting for the PP at the Montauk Public Library, Montauk, NY on 24 October 2019.

- Updated the Administrative Record with additional documents.

A PP public comment period occurred from 1 October 2019 through 15 November 2019. USACE published a public notice in the East Hampton Star and Southampton Press Eastern Edition newspapers on 17 October 2019 announcing the PP public meeting and the availability of the PP at the Montauk Public Library.

A meeting with the Town of East Hampton was conducted on 10 February 2022 to present the findings from the Phase IV RI activities, including the conclusion of NFA in the RI Addendum Report. The Town of East Hampton and other stakeholders were provided an opportunity to review the RI Addendum Report, which was also provided to the public as part of the Administrative Record. The report has been approved from NYSDEC, NYSDOH, and the United States Geological Survey (USGS) without comment.

2.4 SCOPE AND ROLE OF RESPONSE ACTION

This DD authorizes NFA associated with Camp Hero FUDS. Thus, there are no response actions to be conducted by USACE.

2.5 SUMMARY OF SITE CHARACTERISTICS

2.5.1 Conceptual Site Model

A Conceptual Site Model (CSM) describes: 1) the contaminant source(s); 2) the release and transport mechanisms; 3) the exposure media; 4) the exposure routes; and 5) the potentially exposed populations. An exposure pathway is the link between environmental releases and local populations that might come into contact with, or be exposed to, environmental contaminants. The primary objective of the CSM is to identify the complete and incomplete exposure pathways. A complete pathway has all the five components listed above, whereas an incomplete pathway is missing one or more.

Source of Contamination

COPCs that were evaluated in the RI and RI Addendum included: VOCs, SVOCs, PAHs, PCBs, and metals (USACE, 2019a and 2022). There is no documentation of the actual release mechanisms at Camp Hero FUDS for the COPCs other than the petroleum release at Building 203, which is currently a closed site by NYSDEC and exempt from CERCLA. As previously described, the sources of COPCs could be naturally occurring, anthropogenic, discharges from septic drain fields throughout Montauk Point, or from Camp Hero FUDS.

Release and Transport Mechanisms

There are three main mechanisms that can release and transport COPCs at the Site: erosion and surface runoff; wind erosion/volatilization; and leaching to and migration of contaminants in groundwater. Surface water runoff occurs during rainfall and snowmelt when COPCs in the soil are released through soil erosion and transported to other areas on site via site drainage. Wind erosion of soils can also play a role in releasing COPCs from soil. This holds true where activities such as vehicular traffic on roads and other construction-related activity is occurring. Dust emissions may be an important route of exposure due to the amount of traffic that occurs from visitors to the State Park. The third release and transport mechanism is leaching to groundwater. Following release to the ground surface, infiltration would transport COPCs through the soil column to the groundwater and they would migrate laterally depending on the flow gradient. For

instance, contaminants released from septic tank drain fields could travel large distances over time in the UGA.

Exposure Media, Routes of Exposure and Exposed Populations

For the human health assessment, the potentially contaminated media included soils, groundwater, and indoor air. COPCs in soil may be incidentally ingested and absorbed through the skin. In addition, dust or VOCs released from the soil into the air would be available for inhalation. COPCs in groundwater may also be ingested, absorbed through the skin while bathing/showering, and inhaled during showering. The inhalation while showering pathway was evaluated for only those COPCs determined to be volatile. VOCs present in indoor air resulting from VI would be available for inhalation by building inhabitants.

2.5.2 Site Overview

2.5.2.1 Physical Setting

The former Camp Hero is located on the eastern tip of Long Island, known locally as the South Fork, within Suffolk County, NY, approximately 5 miles east of the village of Montauk (**Figure 2-1**). The Camp is bounded by Montauk Highway (Route 27) to the north, the Atlantic Ocean to the south, Montauk Point State Park to the east, and an undeveloped sanctuary area to the west. The Town of East Hampton owns Turtle Cove Town Park to the east and a residential area adjacent to the northwest boundary of the Park. Main access to the Park is from Route 27 onto park roads. The landscape includes wooded areas, freshwater wetlands, and seaside bluffs. A general site layout map of Camp Hero is provided as **Figure 2-2**.

The Camp Hero main entrance is located at the northeast corner of the Park. The Park currently contains hiking trails and roadways leading to former military buildings, picnic areas, and recreational areas. One former military building, the Fixed-Pulse Radar Surveillance (FPS)-35 Radar Tower and Antenna (Radar Tower), is listed under the NRHP. However, the FPS-35 Radar Tower is sealed and in a restricted area from park visitors. Three park buildings are active at this time: the park ranger gate house at the main entrance, a vehicle maintenance building, and a building used as a residence for a Park Police officer. The Park property is fenced, and the inactive

buildings and bunkers have been sealed; however, some portions of these areas may be accessible to trespassers.

2.5.2.2 Site-Wide Geology and Hydrogeology

Topography and Geology

Long Island is in the Atlantic Coastal Plain Physiographic Province of the United States. The eastern end of Long Island is divided by a series of connected bays and rivers that create two peninsulas known locally as the North and South Fork. Camp Hero State Park is located on the extreme eastern point of the South Fork. Physiographic features of Long Island are dominated by the Ronkonkoma Moraine. The Ronkonkoma Moraine forms an irregular ridge of coalescing hills traversing Long Island from west to east. The surface features of this moraine are characterized by hills and depressions (knob-and-kettle topography) with steep terrain, thickly wooded areas, and densely vegetated wetlands. Within Camp Hero State Park, the hills rise in elevation to approximately 110 feet above mean sea level (amsl). Along the south shore of the Park, steep bluffs rise abruptly from sea level to elevations of 30 to 80 feet amsl above narrow, rock-strewn beaches.

The geology of the Camp Hero State Park area is underlain by crystalline bedrock of Pre-Cambrian age. The bedrock consists of gneiss and schist and is estimated to be 1,300 feet below sea level inferred from bedrock boreholes on the North Fork of Long Island. Successive overlying units include unconsolidated deposits of Cretaceous, Pleistocene, and beach and marsh deposits of recent geologic age.

The Pleistocene deposits underneath Camp Hero are the result of the advance and retreat of several glaciers during the Pleistocene Epoch. These glacial deposits can be divided into two general categories by depositional environment: till (unstratified deposits) and stratified deposits. Till is a poorly sorted mixture of gravel, sand, silt, and clay deposited directly from the glacier by melting ice. Stratified deposits consist of the same till components but are sorted into discrete beds by the action of flowing glacial meltwater (USGS, 1986).

The upper 200 feet of these glacial deposits at Camp Hero can be broadly divided into an upper unit, consisting of undifferentiated (mixed) till and stratified deposits, and a lower unit of stratified deposits (USGS, 1963). Within the upper unit, the lower 20 to 40 feet consists of interbedded clay, silt, and thin lenses of fine brown clay. The middle portion is compact clayey and gravelly till, occasionally grading laterally into fine-grained stratified sand deposits. Overlying the compact till are typically stratified deposits 0 to 30 feet thick below the ground surface that are composed mostly of lenses of silt, fine to medium sand, and clayey sand (USGS, 1963). As interpreted from a series of geophysical logs, the bottom of the upper undifferentiated till and stratified unit is mapped at 20 to 30 feet below sea level across Camp Hero and acts as a confining layer to the stratified sand units below (USGS, 1986). The thickness of the upper undifferentiated till and stratified unit is greater than 70 feet.

The lower confining layer of this unit was evaluated as one of the main focus goals of the Phase IV RI. The geological mapping and geotechnical analysis of soils from the installation of the four new deep monitoring wells installed in the UGA confirmed the presence of a competent confining layer, approximately 12 feet thick, above the UGA. This result was consistent with other historical USGS boring logs reviewed during this investigation.

Hydrology

Surface water features at Camp Hero consist primarily of small unnamed drainage streams and wetland areas. The surface water flow at Camp Hero occurs primarily through drainage channels to three small unnamed streams. Two of the streams collect water from the western portion of Camp Hero and flow northwestward to Oyster Pond; the third stream receives surface water from the eastern portion of Camp Hero and flows north to south and discharges to the Atlantic Ocean. Some of the drainage channels and wetlands contain water most of the year because they are underlain by deposits of low permeability till, which inhibit infiltration. Most of these drainage features become seasonally dry at Camp Hero when precipitation is low, and evapotranspiration is high (USGS, 1986).

Precipitation that is not lost through evapotranspiration or surface discharge to drainage channels percolates downward into the underlying till and stratified drift unit. The downward movement of water through the till and stratified drift is impeded by interbedded lenses of clay and silt. The water forms perched water lenses due to the presence of silty and clayey sand lenses interbedded with the less permeable lenses of silt and clay. Some perched water moves laterally along the interbedded layers and discharges as seepage into drainage channels, wetlands, and shoreline areas. The remaining water is available to continue moving downward as recharge (USGS, 1986).

The net amount of precipitation that results in recharge of the UGA in the area of Camp Hero and the areas where recharge occurs is difficult to assess. Despite the numerous lenses of perched water, the underlying till and stratified drift unit functions primarily as confining layers that largely inhibit recharge to the underlying UGA (USGS, 1986). Based on review of site conditions, the areas of Camp Hero where the greatest recharge of the UGA would likely occur is in downgradient wetland areas, streams, and swales, where water accumulates most of the year, and infiltrated water is under a downward vertical hydraulic head pressure.

Hydrogeology

The regional aquifer system in Suffolk County consists of a sequence of unconsolidated deposits overlying crystalline bedrock. The hydrogeologic units, in descending order, are: Pleistocene-aged glacial deposits that form the glacial aquifer, the underlying Gardiners Clay, the Cretaceous-aged deposits that compose the Magothy aquifer, the underlying Raritan Clay, and the Lloyd aquifer.

At Camp Hero, perched groundwater lenses are located in the upper till and stratified deposits above confining silt and clay. The perched groundwater lenses were the focus of the groundwater investigation during Phases I through III, while Phase IV focused on the deeper UGA. The perched water flows horizontally with the slope of topography and seeps into downgradient streams, drainage swales, and wetlands. These downgradient drainage features eventually flow off-site to Oyster Pond in the northwest and to the Atlantic Ocean to south. Based on monitoring well development and low-flow groundwater sampling during RI activities, the perched groundwater exhibits low yields and is very slow to recharge. During the summer months, when precipitation

is less frequent, and evapotranspiration is highest, perched water may be locally absent at Camp Hero. The perched groundwater elevations measured during the RI ranged from 35 to 95 feet above the UGA.

A groundwater potability analysis was completed as part of the RI to assess whether perched groundwater at Camp Hero should be considered a potential potable water source. The results of this analysis indicated that the shallow perched groundwater at Camp Hero was unsuitable for drinking based on the perched groundwater characteristics and Suffolk County drinking water well standards.

The UGA is present in the lower unit of stratified glacial deposits underneath the upper confining unit of undifferentiated till and stratified glacial deposits. The glacial aquifer has been classified as a confined freshwater lens hydrogeologic setting (USGS, 1997). This classification represents areas in Suffolk County where the UGA is confined and bounded laterally and below by saltwater. The UGA is isolated from the rest of Long Island's groundwater system. The confined freshwater lens is under artesian pressure and has a head ranging from about sea level to 3.5 feet above sea level (USGS, 1997).

At Camp Hero FUDS, the glacial till with confining layers of silt and clay separates the perched groundwater and the deep aquifer. This layer ranges in thickness from approximately 130 feet thick in the central portion of Camp Hero to 100 feet thick along the seaside bluffs. The areas of Camp Hero and surrounding vicinity where recharge of the UGA primarily occurs are difficult to define. In elevated areas of Camp Hero where there is more till with greater clay content and steeper slopes, the amount of surface water runoff is greater and downward movement of water as recharge to the UGA is inhibited. Based on site observations and review of literature, the areas of Camp Hero and vicinity with the greatest potential for recharge are located in areas with less slope and less till thickness, such as wetland areas, stream beds, and drainage swales. These areas that accumulate water most of the year likely provide the greatest potential for infiltration and recharge to the UGA. The water that does infiltrate in these areas likely remains under a downward vertical hydraulic pressure that facilitates recharge to the UGA.

2.5.2.3 Nature and Extent of Contamination

All four phases of the RI identified low levels of VOCs, SVOCs, PAHs, PCBs, and metals in surface and subsurface soils, surface water and sediments related to onsite streams and wetlands, perched water lenses, and groundwater within the deeper UGA. The Phase IV RI field effort also evaluated off-site groundwater in the UGA that was representative of local groundwater conditions. Based on the results of the four phases of the RI, there was no evidence of a significant release of contamination from Camp Hero FUDS, except for the petroleum release at Building 203, which is exempt from CERCLA and has since been closed by NYSDEC. This conclusion is based on the spatial distribution of the low levels of constituents both on Camp Hero and in the general vicinity off-site of Camp Hero. The disposition of constituents indicates naturally occurring sources of some metals and anthropogenic, septic drain fields, and/or Camp Hero FUDS sources of the other constituents.

2.6 CURRENT AND POTENTIAL FUTURE LAND AND WATER USES

2.6.1 Land Use

The investigation area for this RI was limited to the subset of Camp Hero State Park that contains the footprint of the former military operations, excluding the two parcels Area H and Area K. The majority of the Camp Hero FUDS property (415 acres of the total 461 acres) is used as an NYS Park. Approximately 46 acres within the Camp Hero FUDS boundary is owned by the Town of East Hampton and used for affordable housing, which consists of 27 former Air Force housing units located along the south side of Montauk Highway (Route 27).

Future land use is anticipated to remain the same. Correspondence from NYSOPRHP to the USACE on future park use plans indicated that NYSOPRHP may add new camping areas and new trails to the Park (Mr. Brian Foley, Long Island State Parks Region deputy regional director, personal communication, 3 April 2017).

2.6.2 Groundwater Uses

There is one onsite deep UGA water well that is currently used for non-potable use at the NYS Park Motor Pool building. There are multiple off-site UGA wells used for potable uses including

the residences along Old Montauk Highway to the south-southwest and two drinking water wells to the northeast: Montauk Point State Park and Montauk Point Lighthouse supply wells. The rest of the residences in Montauk Point appear to be serviced by Suffolk County municipally supplied water, which is obtained from an aquifer that is not hydraulically connected to the UGA beneath Camp Hero. As previously discussed, there is not a use for the discontinuous perched water at Camp Hero.

2.7 SUMMARY OF RISKS

Comprehensive baseline human health and ecological risk assessments were completed during the RI and included comparisons of media concentrations of chemicals against applicable human health or ecological SLs and site-specific background threshold values, quantitative risk calculations, a site and background population means comparison, a geochemical statistical evaluation for metals, and additional characterization of PAHs, including PAH forensics and PAH source evaluation. Based on these evaluations, there were no COCs identified that could be attributed to a CERCLA release.

An HHSE was completed as part of the RI Addendum, which did not identify any adverse health effects from drinking water from the UGA groundwater for onsite hypothetical residents, constituent offsite residents living southwest of Camp Hero, and the public at the Montauk Point State Park and the Montauk Lighthouse and Museum located northeast and adjacent to Camp Hero (USACE, 2022).

2.8 REMEDIAL ACTION OBJECTIVES

Remedial Action Objectives (RAOs) are based on human health and environmental risks that drive the formulation and implementation of response actions. Since NFA is the selected response for Camp Hero FUDS, an FS was not required; therefore, RAOs were not required to be established.

2.9 DESCRIPTION OF ALTERNATIVES

Not Applicable.

2.10 ANALYSIS OF ALTERNATIVES

Not Applicable.

2.11 SELECTED REMEDY

Not Applicable.

2.12 STATUTORY DETERMINATIONS

This NFA response at Camp Hero FUDS is protective of human health and the environment and complies with Federal and State requirements. A Five-Year Review is not required.

2.13 DOCUMENTATION OF SIGNIFICANT CHANGES

The regulator (NYSDEC) and property owner (NYSOPRHP) are in agreement with the NFA decision.

3. PART 3: RESPONSIVENESS SUMMARY

The purpose of the Responsiveness Summary is to provide responses and information to all inquiries and concerns provided during the public review of the PP for the Camp Hero FUDS in Montauk, New York. The PP was issued by the USACE, which is the DoD executive agent for the DERP - FUDS program, in coordination with the NYSDEC, NYSDOH, and the NYSOPRHP. The USACE issued the PP as part of its public participation responsibilities under CERCLA §117(a), 42 USC §9617(a) and the NCP §300.430(f)(2).

The USACE issued the PP for public review on 1 October 2019 and invited interested members of the public to review and comment on the PP during a 45-day Public Comment Period from 1 October 2019 to 15 November 2019. A Public Meeting and Hearing (subsequently referred to herein as the Public Meeting) was hosted on 24 October 2019. Participants in the public meeting included general community members and representatives of the USACE, NYSDEC, NYSDOH, and NYSOPRHP. Oral comments were received during the Public Meeting. USACE did not receive any written comments.

3.1 STAKEHOLDER COMMENTS and LEAD AGENCY RESPONSES

The regulatory agency (NYSDEC) and property owner (NYSOPRHP) agreed with the NFA decision. However, there were concerns from the public, including the Town of East Hampton, concerning the lack of an investigation of the UGA from which drinking water is obtained.

This responsiveness summary presents the oral comments received during the public meeting as well as written comments provided by the Town of East Hampton. A response to each comment is provided as stated during the public meeting and additional follow up responses, where applicable. A transcript of the public meeting discussions is provided in **Appendix B**.

Summary of public meeting oral comments received and USACE Responses:

Comment 1:

Public Meeting Attendee: 203, is that the generator building? Did you test for chromium [sic] and antifreeze and stuff like that there? Because I heard rumors from guys that actually work there who gave direct to discharge stuff right on the ground.

USACE Response to Comment 1:

The most common antifreeze solutions are mixtures of water and either ethylene glycol or propylene glycol. Because these chemicals are clear and colorless, a green or yellow dye is often added. The RI records review indicated that solvents may have been discharged to the ground in the area behind former Building 203 and adjacent to the former USTs.

In 1994, during the UST removal at the former Building 203, a green liquid that appeared to be ethylene glycol was observed on the sidewalls of the excavation and on water standing in the bottom of the excavation. Additionally, several drums of glycol were identified at the site during the 1993 UST removal action and several hundred feet of piping containing 150 gallons of ethylene glycol were noted in the former power generator building, presumably used for cooling the generators (NYSDEC Spill Report 93-09575, 1993).

However, unless there is a continuing source of ethylene or propylene glycol, these chemicals will not be detected one or two decades after they have been released. Because the ethylene glycol in the soil and the piping was removed during the 1994 UST excavation and building demolition, no samples were collected for ethylene glycol during the RI.

The RI soil, surface water, sediment and groundwater samples were analyzed for VOCs, SVOCs, PCBs, and metals. The metals total chromium and hexavalent chromium were evaluated in soil and groundwater at the former Building 203 (DU01), and in surface water and sediment downgradient of former Building 203 (stream exposure area [SEA] 06). The human health risk assessment (HHRA) included evaluation of total chromium and hexavalent chromium. The HHRA indicated that total chromium and hexavalent chromium did not pose adverse health effects from exposure to site media.

Comment 2 [follow-up comment to the Comment 1]:

Public Meeting Attendee: That's also the source of a 10,000 gallon fuel oil spill going all the way down to Oyster Pond, that according to your document, looks connected to the aquifer that we were using. Have any of the contaminates [sic] actually been plotted on a map to see if there's a general trend of where these things are and where they're going? I know you said it's all unperched water, but it was actually a runoff for the fuel all the way down to Oyster Pond back in -- what was that -- the 80s? Just before -- just before we moved in there, I think it was, or just after we moved in there, about '84, I think it was. It was a 10,000-gallon discharge, approximately, from the large aboveground storage tank that was at the generator station. Did they do core samples immediately adjoining that area, next to that? That's it.

USACE Response to Comment 2:

The Remedial Investigation (RI) records search and interviews with New York State Department of Environmental Conservation (NYSDEC) Spills Response Program identified a 1,000 gallon release reported on 13 January 1991 from the above ground petroleum storage tank (RI Site AST35). The release was caused by vandals opening a valve on the abandoned 200,000-gallon AST35. The petroleum from AST35 drained to a small creek which eventually flows to Oyster Pond approximately 4,500 feet to the northwest.

The NYSDEC Spills Response Team responded to the spill on 14 January and placed petroleum absorbents in the creek and along the creek embankments. A spill cleanup company (Tyree Brothers) was hired to perform cleanup of the petroleum. Tyree placed and maintained absorbent booms and pads along the creek and at the mouth of the creek at Oyster Pond. Petroleum stained debris (vegetation) was also removed along the creek and disposed. The cleanup activities continued daily from January through March 1991. On March 15, 1991, NYSDEC inspected the site and determined that no further contaminated debris removal was necessary and that weekly monitoring and maintenance of remaining absorbent booms was required. NYSDEC also required that all petroleum storage tanks remaining at Camp Hero be checked for petroleum and that all remaining petroleum be removed from tanks and disposed.

During the RI, the AST35 area was investigated including sampling of soil and groundwater from three wells installed in the petroleum release area. Surface water and sediment samples were also collected from the creek in which the petroleum was released. No contamination was found in the soil, groundwater, surface water, or sediment samples that were collected that had concentrations which posed a risk above USEPA ecological or human health risk screening criteria. The RI Addendum investigation identified a few petroleum based constituents in new monitoring wells that are located in the approximate downgradient direction of AST35 (USACE, 2022). However, none of the constituents exceeded the most conservative screening levels. Additionally, any residual constituents of the spill from over 30 years ago would have naturally biodegraded.

Comment 3:

Public Meeting Attendee: Oh, were there any carcinogenics identified in any of these things? Because we have an abnormal amount of cancer up in that small residence up there. 27 families and it's a little unheard of to have, like, 20 percent of them that have cancer. That's it.

USACE Response to Comment 3:

The human health risk assessment that was completed as part of the Remedial Investigation did not identify risks for carcinogenic or non-carcinogenic chemicals above USEPA risk level criteria that would cause concern at Camp Hero. The New York State Department of Health (NYSDOH) was consulted on this question and indicated that a 20% cancer rate is not considered an anomaly. For further information, there is a state-wide cancer study report available from the NYSDOH New York State Cancer Registry at https://www.health.ny.gov/statistics/cancer/registry/.

Comment 4:

Public Meeting Attendee: You said in 1994, I believe it was, that you took 100 truckloads of dirt out of there? I live there, I never saw one truck leave that place ever. I live up there. I've lived there since '87, and I never -- I mean, I think I would have saw these big trucks. I certainly saw them coming in and dumping the dirt on the beach in town. I never saw them going out of my neighborhood ever. So that's a little weird to me.

USACE Response to Comment 4:

The waste manifest for each truck are included in the UST Closure Report, UST #'s 16 & 18, Building 203, Camp Hero, Montauk, New York, Contract Number: DACA51-93-C-0035, Removal of Storage Tanks, Transformers & Miscellaneous (C02NY002401_02.13 0001, USACE, 1994). The waste manifest is a form required by EPA and the Department of Transportation for all generators who transport, or offer for transport, petroleum impacted or hazardous waste for off-site treatment, recycling, storage or disposal.

Non-hazardous petroleum impacted soil was properly disposed at Grand Central Sanitary Landfill in PenArgl, PA, and recycled at Soil Remediation of Philadelphia, PA. UST contents, drums, and Building 203 floor debris was disposed as hazardous waste at Chemical Conservation of Georgia, in Valdosta, GA.

Comment 5:

Public Meeting Attendee: And also, all this study is being done because, why? Because of a proposed plan to put a campground back there? Or why all of a sudden there's being a study done?

USACE Response to Comment 5 [Response given at Public Meeting by Mr. Goepfert]:

Actually, this site 17 [Camp Hero] is a Formerly Used Defense Site [FUDS]. These 18 sites have been in the queue for many, many years. We just happened to get funding about three years ago to get started with this investigation because the defense department is trying to close out all these sites by the year 2020, okay? So this -- Camp Hero, I think it was towards the end of the whole list of sites that we had in New York. Of course, this process started back in the early '90s, okay? Here we are, 20 years, almost 30 years later, but the process started at that time. And the investigation is really trying to wrap everything up at the site.

So really, the only thing that moved us to get out here and to get this site prioritized was really the advocacy of the State of New York to try to help us get more sites done in New York State. So it had nothing to do with what anybody's plan for the site was, to the best of my knowledge.

Additional Response:

During the past 200 years, some activities supporting military readiness resulted in the need for environmental cleanup within the United States and its territories. The DoD, the U.S. Navy and USACE are committed to protecting human health and the environment and improving public safety by cleaning up these properties.

These properties include FUDS, which when under the jurisdiction of DoD prior to October 1986, were used for a variety of purposes, including training and supporting Soldiers, airmen, sailors and Marines, as well as to test new weapons and warfare capabilities. When no longer needed, many of these properties were cleaned up according to the best practices at the time and then transferred to other owners such as private individuals or federal, state, tribal or local government entities.

Congress created the FUDS program in the mid-1980s. Under Army oversight, USACE executes the program pursuant to CERCLA. That work includes identifying eligible properties, investigating their condition and addressing any contamination by hazardous substances contamination that was the result of DoD activities. USACE is committed to addressing this contamination in a safe, timely, and responsive manner. Teams from USACE districts consult with state environmental and health offices, the U.S. Environmental Protection Agency, landowners and the public in performing the work.

Comment 6:

Public Meeting Attendee: Does this range to the old dump at Flamingo where the Army deposited most of their junk? The old town dump on Flamingo Road? I hear they buried a ton of stuff over there from, like, my grandfather and stuff like that. I heard this stuff. I was wondering if that encompassed that area too?

USACE Response to Comment 6 [Response given at Public Meeting by Mr. Goepfert]:

USACE PM: Well, the report that was written, I don't have any recollection of that issue being addressed in the report, but we will look into that.

USACE Response to Comment 6 [Additional Response]:

No records of off-base disposal from FUDS activities at Camp Hero were identified as an area of concern in the Camp Hero FS/Hazardous Materials Survey, prepared by NY State Parks contractor, Cashin Associates, in 1998 (Cashin, 1998).

Comment 7:

Public Meeting Attendee: Do you have a list of the things that you tested for? I came a little late, I didn't know if you mentioned it.

USACE Response to Comment 7 [Response given at Public Meeting by Mr. Goepfert]:

USACE PM: Yes. Actually, in that small book, the proposed plan handout that's on the table. We'll hand you a copy. In one of the attachments is a list of all the contaminates [sic].

Comment 8:

Public Meeting Attendee: And another question. All that dirt that you said was removed, did they replace it with dirt? Did they bring dirt back in to – It [the report] shows where they took the dirt out and what happened?

USACE Response to Comment 8 [Response given at Public Meeting by Mr. Goepfert]:

USACE PM: Yes, with clean material. To the best of my knowledge, yes. There's a separate report that documents all that work that I can make available to you.

USACE Response to Comment 8 [Additional Response]:

The waste manifest for each truck are included in the UST Closure Report, UST #'s 16 & 18, Building 203, Camp Hero, Montauk, New York, Contract Number: DACA51-93-C-0035, Removal of Storage Tanks, Transformers & Miscellaneous (C02NY002401_02.13 0001, USACE, 1994). The waste manifest is a form required by United States Environmental Protection Agency and the Department of Transportation for all generators who transport, or offer for transport, petroleum impacted or hazardous waste for off-site treatment, recycling, storage, or disposal.

Non-hazardous petroleum impacted soil was properly disposed at Grand Central Sanitary Landfill in PenArgl, PA, and recycled at Soil Remediation of Philadelphia, PA. UST contents, drums, and

Building 203 floor debris was disposed as hazardous waste at Chemical Conservation of Georgia, in Valdosta, GA.

The UST excavation was backfilled with fill material. There are no required forms or regulatory records required to document fill material placed into an excavation. The USACE may potentially have a record of fill material volume provided to the job site for cost documentation purposes.

Comment 9:

Public Meeting Attendee: What about the wells? Did you take any samples in the base itself where our houses are there? Are there any – can we find out what you found in our area itself? Just the groundwater there, because we have had a lot of problems up there.

USACE Response to Comment 9 [Response given at Public Meeting by Mr. Goepfert]:

USACE PM: Well, I mean, all the results of the wells are in the report. We did not sample any wells in anyone's personal residences. So all of the results of all the wells that we tested are in the report. And for ease of use, you can look in the report and it has all the wells listed where the tests were done. Tests were not done of any private residential areas.

USACE Response to Comment 9 [Additional Response]:

Following the public meeting and in response to public comments, USACE decided to complete a limited study of the deep aquifer used for drinking water. Seven onsite and seven offsite wells were sampled including one of the Madison Hill wells. The 14 wells were sampled in December 2020 and February 2021, with results provided in the Camp Hero RI Addendum Report. Groundwater from the monitoring wells were analyzed for a full suite of chemical constituents. A total of 44 constituents were detected at least once with 15 constituents exceeding the most conservative screening level (SL). Data collected from the Madison Hill well that was sampled exceeded SLs for polychlorinated biphenyls (PCBs), arsenic, manganese, and sodium. Figure 4-1 from the Camp Hero RI Addendum Report provides a summary of the results that exceeded the most conservative SLs and is provided following this response for ease of review (this Figure is provided at the end of this Responsiveness Summary). The constituents arsenic, manganese, and sodium are naturally occurring in the Montauk area, with manganese a non-hazardous metal and

sodium an essential nutrient. A risk assessment that was completed did not identify any adverse health effects from drinking water from the deep aquifer related to PCBs or any other constituents.

From a historical standpoint, a Freedom of Information Act (FOIA) was submitted by USACE to the Suffolk County Department of Health Services, Office of Water Resources, to obtain groundwater sample results from drinking water wells in the residential neighborhoods surrounding Camp Hero area, including the Madison Hill Well Field, at the beginning of this project in December 2015. Groundwater sample results from the Madison Hill Wellfield have been obtained from 1984 to 2010, which are summarized in Table 3-2 of the RI Addendum Report and provided following this response for ease of review.

The Office of Water Resources is empowered by the Federal Safe Drinking Water Act, and the New York State and Suffolk County Sanitary Codes to enforce regulations controlling 39 Community Water Supplies (CWS) and 254 Non-Community Water Supplies (NCWS) in Suffolk County. The Office of Water Resources obtains a water sample from these supplies yearly and analyzes for a comprehensive suite of analysis. This drinking water analysis was requested for the two former CWS wells (Madison Hill Wellfield) that existed at Camp Hero and the NCWS at the Montauk Light house. Copies of laboratory analysis available from the early 1980's (when military activities formerly ceased) to the most recent analysis was requested. The Office of Water Resources does not have comprehensive analytical results for these wells prior to the 1980s.

A telephone interview was conducted with Ms. Susan Riley of the Office of Water Resources regarding her knowledge of the water quality at these wells. Ms. Riley indicated that from her review of the database records, one of the CWS wells (Madison Hill Wellfield) exceeded the drinking water maximum contaminant levels (MCLs) for arsenic before being abandoned and both supply wells were relatively high in content for secondary drinking water MCLs manganese and iron. The two CWS wells (Madison Hill Wellfield) have been taken out of service and the community has been connected to the Suffolk County Water Authority municipal water.

Comment 10:

Public Meeting Attendee: We had -- up in that area we had our own kind of water district that it was three major wells that a whole development drew off of. And nobody up there has a private well. And I think that's what Mike was asking. Were those wells tested?

We're currently on the Suffolk County water system now, mostly. But originally, we had our own separate water district where we drew off of our own separate wells up in that area. And I think that's what he was concerned about. Were those wells tested? So that's the question.

USACE Response to Comment 10 [Response given at Public Meeting by Mr. Goepfert]:

USACE PM: Well, I think that question would need to be directed to Suffolk County. If somebody tested those wells, it wasn't the Army Corps that tested those wells.

USACE Response to Comment 10 [Additional Response]:

Please see response to Comment 9.

Comment 11:

Public Meeting Attendee: I live adjacent to the camp and I have a well that I'm drawing my water at 188 feet. You get into water that's potable, probably at about 135 feet, adjacent there, I'm right off the fence line. I'm wondering, what they're wondering, is when you were doing those testing was any testing done, even at your own wells that went down 135 feet or was it basically just the perched water?

I know you said there wasn't any leaking, but we're talking about 50 years of potential -- we're wondering, I'm not on public water, I'm still getting water out of the ground, so are my neighbors. We're all wondering if our water has been tested, in any way, by the government? If it hasn't been then we have to look --

Part of this whole -- all the water that's perched water there works it's [sic] way to Oyster Pond.

So all part of that watershed, it all runs down there. I'm not concerned as much about perched water as I am about the potential that the water could have leeched down into the water that we're

drinking. In other words, water can go there and once it's part of that resource, we have to be concerned about it.

I don't have any information that says it is. I'm wondering if part of this comprehensive study, why we didn't get anything telling us what is going on 180 feet down. That's all. My water -- is my water fairly safe? Does it got anything like PCBs in it because that potentially was dumped at that site in 1955? We didn't know that based on the study.

Not my well, did you test at that depth? But you're saying there was no deep water testing done as part of this -- it was just perched water to see what kind of contaminates were in the upper level of waters there.

I would just like to say, to follow up on that, the in Bethpage with Drummond over a continuous period of time, and water contaminates did get into drinking water, it may be of concern there. I realize it has nothing to do with this study, but if you live in the area, that's one of the questions that you ask yourself over a period of time, what did the military do there? Did it work? As Eric has said, it's way down over a long period of time. I know they're not connected, but leeching poisons to make its way down into other areas is in the news. We don't know that. I have no way to know for certain if it did. But that's the question, as residents, were originally asking. What did go on there and did it affect our water?

USACE Response to Comment 11 [Response given at Public Meeting]:

USACE PM: Well, we didn't test your well, obviously. Because we would not expect to see anything through a confining layer. Well, I think that question would need to be directed to Suffolk County. If somebody tested those wells, it wasn't the Army Corps that tested those wells.

USACE Response to Comment 11 [Additional Response]:

Please see response to Comment 9. Also, see below:

Specific to the location near the residences on Old Montauk Highway, four new deep aquifer monitoring wells were installed on the southwest corner Camp Hero property during the recent investigation conducted by USACE as part of the Phase IV RI with results summarized in the Camp Hero RI Addendum Report. Nested monitoring wells CH-MW044S (shallow) and CH-

MW044D (deep) were installed to a total depth of 120 and 157 feet below ground surface, respectively. Nested monitoring wells CH-MW045S (shallow) and CH-MW045D (deep) were installed to 95 and 136 feet bgs, respectively. The depths of the shallow monitoring wells were intended to be consistent with the depths of the older drinking water wells along Old Montauk Highway, which are screened near the top of the deep aquifer. The depths of the deep monitoring wells were intended to be consistent with the depths of the newer drinking water wells along Old Montauk Highway, which are now required by Suffolk County private water well regulations to be installed a minimum of 40 feet below the water table. The locations of these four new wells are inherently downgradient of the active areas of Camp Hero FUDS and thus, are intended to investigate potential releases that may have entered the deep groundwater aquifer.

The analytical data collected from the four new deep aquifer wells over two sampling events indicated that there were multiple detections above the most conservative SLs; however, based on a human health risk evaluation, none of the detections indicated adverse health effects from drinking water from the deep aquifer. Figure 4-1 from the RI Addendum Report provided following the response to comment #9 provides the list of detections above SLs for each of the referenced four deep monitoring wells. The conclusions of the RI Addendum report were: (1) metals with relatively high results are naturally occurring and non-hazardous CERCLA (barium, iron, and manganese), (2) the remaining constituents were detected at low concentrations with mostly spatial distribution throughout onsite and offsite wells, (3) determining if the source of detected constituents is from DoD activities is difficult to determine due to 40+ years of elapsed time since Camp Hero FUDS was operational, natural degradation for some constituents such as VOCs, and the relative immobility of others (SVOCs, PAHs, and PCBs), (4) spatial distribution of constituents between onsite and offsite wells indicates strong potential source from widespread use of septic drain fields throughout Montauk Point and/or anthropogenic releases, and (5) none of the detected constituents presented actionable risk. Thus, based on this limited deep groundwater aquifer investigation, the NFA determination that was recommended at the conclusion of the RI remained appropriate for Camp Hero under CERCLA.

Specific to the possibility of “leaking” to the deep aquifer, the visual geology and geotechnical samples collected during the installation of the four new deep monitoring wells confirmed the

presence of a significant confining layer between the perched water lenses and the drinking water aquifer. However, USACE agrees that the deep aquifer has to be recharged somehow so the conceptual site model (CSM) has been revised as presented in Section 3.7 of the RI Addendum Report. The revised CSM now states that the deep aquifer is likely recharged from areas of less slope and less till thickness, such as wetland areas, stream beds, and drainage swales. These areas that accumulate water most of the year likely provide the greatest potential for infiltration and recharge to the UGA. The water that does infiltrate in these areas likely remains under a downward vertical hydraulic pressure that facilitates recharge to the deep aquifer. It cannot be said with confidence whether the recharge occurs from the area of Camp Hero FUDS activities or in the surrounding area to Camp Hero FUDS, but there is no direct evidence of contaminant migration from any of the Camp Hero FUDS sites through four phases of investigation.

NYSDOH recommends annual testing of private wells for total coliform. USEPA and the National Groundwater Association (NGWA) also recommend annual testing of private wells for, at a minimum, total coliform, nitrate, total dissolved solids and pH. Suffolk County Department of Health Services (SCDHS) provides a private well water quality testing program that analyzes for a much wider range of potential contaminants, including volatile chemicals, semi-volatile chemicals, pharmaceuticals, and pesticide compounds and their breakdown products, for a sampling fee of $100, which is much lower than the cost of analyses performed by commercial laboratory testing. In 2012 and 2013, fewer than 600 private well owners requested water quality testing under SCDHS's private well water quality testing program; this is less than 1 percent of the private wells existing in the County. Suffolk County resolutions 245-2000 and 1009-2000 require that when a home with a private well is purchased, the well must be tested prior to closing on the home purchase.

Comment 12:

Public Meeting Attendee: Perched water is funny stuff. It actually goes through gravel and sand layers to the -- and it can pop up miles down the road. I mean, I could tell you a story very near Camp Hero when we put a road in to move a house back in the '70s. And on the top of the hill, one morning they go up here and it's a bubble in the road, and I drove my Toyota truck, it's up in a subdivision, behind Rusty Levy's [phonetic] ranch up there. And at the top of the hill, I drove my

truck, the truck fell in a hole, it was water that popped up from miles away that actually came up to that part. We scraped enough of the ground, and the water pressure pushed the clay up and drove my truck over and went right into it.

But I mean perched water is funny stuff. It's not very easy to tell where the contaminates [sic] go from A to B. It could be over at Z, is what I'm saying. It does migrate.

USACE Response to Comment 12:

Please see responses to Comments 9 and 11.

Comment 13:

Public Meeting Attendee: What does the army do with these sites when they do close them? Do they sell them?

USACE Response to Comment 13 [Response given at Public Meeting]:

USACE PM: Well, you know, it all depends what timeframe you're talking about. Years ago -- there's several programs that deal with base closures, okay? Bases that were closed before 1986 are addressed by the program that I work on called the Formerly Used Defense Site Program, okay? So sites that were closed after 1986 were usually part of what they call a Base Realignment Closure Program, which -- both programs do a lot of the same things with respect to testing sites and making sure that sites are safe for the environment and human health and environment.

You're saying, what happens to these sites? Well, that all depends. Some sites get deeded over to states, some sites get sold off, there's a whole process that takes place when properties are excessed from the government. So that's the generic answer, but that's really the only answer I have for you.

I mean, here in the case of Camp Hero, the site was – a part of which was transferred to the state, a part of which was transferred to East Hampton, part of which was deeded to the Coast Guard. So here we have one site where several actions, transfer actions, take place.

Comment 14:

Public Meeting Attendee: You mentioned -- maybe I misunderstood -- when the department of environmental concern [NYSDEC], whatever, came in and took away the petroleum? So after that

excavation, what happened after that? It looked like you were saying that the Department of Environmental Conservation was going to come back in, but I didn't get a sense they did. What happened after that? And they [the NYSDEC] felt it was contained and removed and replaced with clean top soil; is that what happened?

And you're saying this other department, the Department of Environmental Conservation has to come back in and look at it? So you're saying there's no concern to look any further?

USACE Response to Comment 14 [Response given at Public Meeting]:

USACE PM: They [the NYSDEC] didn't take the petroleum away, the Army Corps took it away. The Corps of Engineers -- that was a spill that I assume the DoD was responsible for. The soils were removed and the clean material was put back in place. But what we have now is because there was some impact to the -- to the perched groundwater in that area, okay? That perched groundwater is still in contact with the soils; so therefore, there is some residual fuels that is located within that area.

They [the NYSDEC] are just looking at our report of our analysis of investigations that just took place recently over the last two years. We [the USACE] don't think there is any [concern] at this point [to look further].

USACE Response to Comment 14 [Additional Response]:

Please see response to Comment 4.

Comment 15:

Do we have to formally put this in writing to get a response to this?

USACE Response to Comment 15 [Response given at Public Meeting]:

USACE PM: No, she's taking notes, and we will be more than happy to respond. That's why we have [the stenographer] Sara taking notes for us.

Comment 16:

The East Hampton Town Planning and Natural Resources Departments have reviewed the Remedial Investigation and the Proposed Plan for the Formally Used Defense Site (FUDS) at

Camp Hero at Montauk New York. The Proposed Plan recommended No Further Action (NFA) pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Town representatives also attended the public meeting conducted by the Corps of Engineers at the Montauk Library on October 24, 2019.

The Town respectfully encourages the Corps to conduct further testing to ensure that all hazardous materials are properly identified and remediated prior to considering the property for any new use under consideration by New York State Parks. Specifically, the extensive clay, silt and other poorly drained sediments that contribute to the extensive freshwater wetlands, streams and surface waters are not uniform as a confining layer to prevent hazardous materials from reaching deeper groundwater resources. The Town strongly suggests the Corps install a series deep groundwater monitoring wells in conjunction with a groundwater sampling regime to confirm the absence of contaminants from the Upper Glacial Aquafer prior to a final determination for No Further Action. These concerns echo the comments offered by many of the Camp Hero residents and other interested parties at the October 24 public information meeting. Furthermore, the Corps should allow the Suffolk County Department of Health Services (SCDHS), the local agency with the greatest expertise in groundwater quality issues, an opportunity to review and comment upon the test results.

The Town notes that the Human Health Risk Assessment (HHRA) and the Ecological Risk Assessment (ERA) Appendices are not available at the Corps project website. The absence of Chemicals of Concern that warrant remediation pursuant to CERCLA does not necessarily indicate the absence of contaminants that may impact human health or the environment.

USACE Response to Comment 16:

USACE took this comment and others from the residents in serious consideration, which led to the funding and execution of the Phase IV RI field effort. Please see responses to Comments # 9 and 11. Additionally, as provided in the RI Addendum Report, USACE completed a review of the potential sources for all constituents detected as well as conducting a human health risk evaluation (HHRE) on the CERCLA hazardous constituents that exceeded the most conservative screening levels. The HHRE concluded the absence of contaminants that impact human health in the deep UGA used for drinking water. Additional details are provided in the RI Addendum Report.

3.2 TECHNICAL AND LEGAL

A Phase IV RI was completed following the public meeting to address community concerns related to the potential impacts from Camp Hero FUDS to the deep aquifer used for drinking water.

4. PART 4: REFERENCES

Cashin Associates, 1998. *Camp Hero Feasibility Study, Hazardous Materials Survey, Preliminary Report, Amended Final. New York State Office of Parks, Recreation and Historic Preservation.* Amended Final, Montauk, New York. June.

NYSDEC, 2019. Letter of Correspondence from Mr. John Swartout to Mr. Greg Goepfert, NYSDEC and NYSDOH Reviews of Draft Final Remedial Investigation Report, Camp Hero, DEC ID# 152231. 7 January 2019.

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USACE, Rock Island District. 2000. *Ordnance and Explosive Waste Archives Search Report Findings for the Former Camp Hero*, Montauk, New York. Site No. C02NY002403. February.

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USACE, 2019a. *Final Remedial Investigation Report.* Former Camp Hero, Montauk, New York. January.

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Appendix A

Stakeholder Comments on RI, PP, and DD

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau A
625 Broadway, 12th Floor, Albany, NY 12233-7015
P: (518) 402-9625 | F: (518) 402-9627
www.dec.ny.gov

January 7, 2019

Mr. Gregory Goepfert
New York District, Corps of Engineers
Department of the Army
Jacob K. Javits Federal Building
New York, New York, 10278-0090

RE: Remedial Investigation Report,
Camp Hero, DEC ID # 152231

Dear Mr. Goepfert:

The New York State Departments of Environmental Conservation and Health (NYSDEC and NYSDOH) have completed reviews of the Draft Final Remedial Investigation Report for Camp Hero dated November 2018. Comments are enclosed for your consideration. Please contact me if you have any questions.

Sincerely,

John B. Swartwout

John B. Swartwout, PE
Section Chief

Enclosure

Ecc: S. Karpinski, DOH
C. Bethoney, DOH
W. Parish, DEC Region 1
N. Acampora, DEC Region 1

Draft Final Remedial Investigation Report for Camp Hero
November 2018
NYSDEC and NYSDOH Comments

1. DU-01 (Building 201 Area): As discussed, based on the finding of floating product (LNAPL) in the vicinity of Building 203, DEC will require further evaluation to determine if remedial action is possible/required. The US ACOE will provide a supplemental report specific to DU-01 with their proposal to address the LNAPL. Specifically, the data will be reviewed and a proposal that will include a NSZD (Natural Source Zone Depletion) Evaluation will be submitted for review and comment.

2. AOC 107 (Building 107): DEC requires submission of a supplemental proposal to address the PCB contamination near the "Transformer Remnants".

3. AOC B113 (Battery 113): DEC requires submission of a supplemental proposal to address the PCB contamination near the "Transformer Remnants" and the two AGT located inside the battery which still contain weathered diesel fuel.

4. We are in agreement with your recommended path forward (NFA under CERCLA) for the other areas of concern/ decision units/ stream exposure areas.

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau A
625 Broadway, 12th Floor, Albany, NY 12233-7015
P: (518) 402-9625 I F: (518) 402-9627
www.dec.ny.gov

January 6, 2020

Mr. Gregory Goepfert
U.S. Army Corps of Engineers, New York District
CENAN-PP-E, 17th Floor, Station 17 401-2
26 Federal Plaza
New York, New York, 10278

RE: Technical Memorandum- Former Building 203 (DU-01), October 2019, Camp Hero, DEC ID # 152231

Dear Mr. Goepfert:

The New York State Department of Environmental Conservation has reviewed the Technical Memorandum- Former Building 203 (DU-01) dated October 2019. The Department approves this document and will close the Spill Number associated with former Building 203. We do, however, request that the language be revised from "Pollution Complaint Number (PC-1602757)..." to read simply "NYS DEC Spill Number 16-02757..." . We do not refer to our Spill Numbers as a Pollution Complaint Number (PC), so this reference should be removed throughout the document to prevent any confusion.

Please contact me at 518-402-9570 if you have any questions.

Sincerely,

John B. Swartwout

John B. Swartwout, P.E.
Section Chief

Ec: J. Swartwout, DEC
S. Karpinski, DOH
C. Bethoney, DOH
W. Parish, DEC Region 1
N. Acampora, DEC Region 1

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau A
625 Broadway, 12th Floor, Albany, NY 12233-7015
P: (518) 402-9625 I F: (518) 402-9627
www.dec.ny.gov

September 27, 2019

Mr. Gregory Goepfert
U.S. Army Corps of Engineers, New York District
CENAN-PP-E, 17th Floor, Station 17 401-2
26 Federal Plaza
New York, New York, 10278

RE: Proposed Plan,
Camp Hero, DEC ID # 152231

Dear Mr. Goepfert:

The New York State Departments of Environmental Conservation and Health have completed reviews of the Proposed Plan for Camp Hero dated September 2019. The Departments concur with the proposed No Further Action remedy. You may release the Proposed Plan to the public on October 1 as scheduled. Please contact Mr. John Swartwout at 518-402-9620 if you have any questions.

Sincerely,

Eric R. Obrecht, PE
Bureau Director

Ec: J. Swartwout, DEC
S. Karpinski, DOH
C. Bethoney, DOH
W. Parish, DEC Region 1
N. Acampora, DEC Region 1

COUNTY OF SUFFOLK

STEVEN BELLONE
SUFFOLK COUNTY EXECUTIVE

DEPARTMENT OF HEALTH SERVICES

GREGSON H. PIGOTT, M.D., M.P.H.
Commissioner

March 4, 2020

Mr. Gregory J. Goepfert, P.E., PMP
U. S. Army Corps of Engineers
New York District (CENAN-PP-E)
26 Federal Plaza
17th Floor - Station 17 401-2
New York, New York 10278

RE: Technical Memorandum - Former Building 203, Camp Hero, Montauk, NY

Dear Mr. Goepfert:

I have reviewed the Draft Final Technical Memorandum for building 203 at the Camp Hero site. Generally, there is a concern that a significant amount of petroleum related floating product (light non-aqueous phase liquid, or LNAPL) exists in the groundwater at the site in which no cleanup or monitoring is being proposed. This LNAPL is apparently the result of a spill that occurred at the Camp Hero site in the early 1990s. It should be noted that it is the policy of the County of Suffolk to maintain its water resources as near to their natural condition of purity as reasonably possible for the safeguarding of the public health and, to that end, to require the use of all available practical methods of preventing and controlling water pollution from toxic and hazardous materials. Specific comments on the memorandum are as follows:

- It has been stated that contamination of the potable drinking water supply is not a concern due to the presence of a confining layer of silts and clays that disconnect the upper portion of the aquifer from the lower portion. Since there is freshwater in the lower portion of the aquifer, there has to be some vertical gradient associated with this area since this indicates that recharge is finding a pathway through the silts and clays. The United States Geological Survey (USGS) provided a similar observation in their January 27, 2020 e-mail to you. Since there must be a hydraulic connection between the upper and lower aquifers, a potential contaminant migration pathway exists to the potable drinking water supply. Due to this fact, the Suffolk County Department of Health Services (SCDHS) recommends installing monitoring wells into the deeper "usable" portion of the aquifer. These monitoring wells will be used to verify if any contaminants have leached through the confining layer. Care should be taken to properly seal the wells so that conduits for rapid contamination migration through the confining layer are not created.

OFFICE OF WATER RESOURCES - DIVISION OF ENVIRONMENTAL QUALITY
360 Yaphank Avenue, Suite 1-C, Yaphank, NY 11980
(631) 852-5810 Fax (631) 852-5787

- In September of 2018 the NYSDEC contracted with the consulting firm Environmental Assessment and Remediation to collect and analyze groundwater samples from Camp Hero for PFAS and 1-4 dioxane. The results showed elevated PFAS compounds (11.5 ppt PFOS in well MW019, 7.5 ppt PFOS in MW020 and 16.1 PFOS in MW023) in all three of the wells, and a detection of 1-4 dioxane in one well (0.4 ppb). Due to these results, the SCDHS recommends a new round of groundwater samples be collected and analyzed for these emerging contaminants.

- The SCDHS agrees with the statement that certain forms of remediation such as soil excavation, bioventing or using surfactants might not be feasible for this site, however the installation of passive collection equipment (i.e. absorbent socks, passive bailers) in the monitoring wells that have measurable LNAPL is feasible and is recommended.

- Table 1 "LNAPL Gauging Test Results" now indicates a presence of LNAPL in CH-MW016 which was only observed in the last two years. SCDHS recommends this well, along with others, continue to be monitored in order to determine if the presence of LNAPL persists. Additionally, this monitoring will assist in evaluating if any LNAPL is mobilizing into other portions of the aquifer.

- The presence of private drinking water wells downgradient (south) of the site is a potential concern. These properties should be evaluated for any possible impacts from the Camp Hero site.

If you have any questions, please feel free to contact me at (631) 852-5773.

Sincerely,

Jonathan Wanlass
Hydrogeologist
Office of Water Resources

Ec: J. Swartwout – NYSDEC
C. Schubert – USGS
B. Frank – Town of Easthampton
A. Rapiejko – SCDHS
S. Karpinski, NYSDOH
W. Dawydiak, SCDHS

Public Health
Prevent. Promote. Protect.

OFFICE OF WATER RESOURCES - DIVISION OF ENVIRONMENTAL QUALITY
360 Yaphank Avenue, Suite 1-C, Yaphank, NY 11980
(631) 852-5810 Fax (631) 852-5787

TOWN OF EAST HAMPTON
300 Pantigo Place – Suite 105
East Hampton, New York 11937-2684

Planning Department
JoAnne Pahwul
Director

Telephone (631) 324-2178
Fax (631) 324-1476

November 15, 2019

US Army Corps of Engineers, New York District
Attn: Mr. G. Geopfert
CENANN-PP-E, 17th Floor, Sttion 17 401-2
26 Federal Plaza
New York, NY 10278

Re: Proposed Army Corps of Engineers (Corps) plan for the former Camp Hero, Montauk, NY
Formerly Used Defense Site
Property No. C02NY0024

Dear Mr. Geopfert:

The East Hampton Town Planning and Natural Resources Departments have reviewed the Remedial Investigation and the Proposed Plan for the Formally Used Defense Site (FUDS) at Camp Hero at Montauk New York. The Proposed Plan recommended No Further Action (NFA) pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Town representatives also attended the public meeting conducted by the Corps of Engineers at the Montauk Library on October 24, 2019.

The Town respectfully encourages the Corps to conduct further testing to ensure that all hazardous materials are properly identified and remediated prior to considering the property for any new use under consideration by New York State Parks. Specifically, the extensive clay, silt and other poorly drained sediments that contribute to the extensive freshwater wetlands, streams and surface waters are not uniform as a confining layer to prevent hazardous materials from reaching deeper groundwater resources. The Town strongly suggests the Corps install a series deep groundwater monitoring wells in conjunction with a groundwater sampling regime to confirm the absence of contaminants from the Upper Glacial Aquafer prior to a final determination for No Further Action. These concerns echo the comments offered by many of the Camp Hero residents and other interested parties at the September 24 public information meeting. Furthermore, the Corps should allow the Suffolk County Department of Health Services (SCDHS), the local agency with the greatest expertise in groundwater quality issues, an opportunity to review and comment upon the test results.

The Town notes that the Human Health Risk Assessment (HHRA) and the Ecological Risk Assessment (ERA) Appendices are not available at the Corps project website. The absence of Chemicals of Concern that warrant remediation pursuant to CERCLA does not necessarily indicate the absence of contaminants that may impact human health or the environment.

Camp Hero currently provides residential housing to a number of East Hampton community members in addition to the invaluable parkland resource. Thank you for the opportunity to provide these supplemental comments. The Town's Planning and Natural Resources Department remain available to work with the Corps on any future investigations at this property.

Sincerely,

Brian Frank
Chief Environmental Analyst
bfrank@ehamptonny.gov

cc: East Hampton Town Board

NEW YORK STATE OF OPPORTUNITY. Department of Health

ANDREW M. CUOMO
Governor

HOWARD A. ZUCKER, M.D., J.D.
Commissioner

SALLY DRESLIN, M.S., R.N.
Executive Deputy Commissioner

August 20, 2019

John Swartwout
Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway, Albany, NY 12233-7016

Re: **U.S. Army Corps of Engineers,**
Formerly Used Defense Site Program
PROPOSED PLAN
Camp Hero
Site # 152231
Montauk, Suffolk County

Dear Mr. Swartwout:

I have reviewed the July 2019 *Proposed Plan* for the above referenced site and offer the following comments:

- The Proposed Plan notes on pages 3 and 4 that a potability analysis was conducted as part of the Remedial Investigation (RI) and concluded that the perched groundwater lenses at the site are not feasible sources of potable water supply due to poor well yield, recharge, and water quality. The RI also notes that the perched groundwater lenses beneath Camp Hero are not hydraulically connected to any drinking water resources in Suffolk County. The potability analysis provided in the RI (located in Appendix K) also notes that before a potable groundwater well could be installed at Camp Hero, the well would be required to conform to standards for community or private water wells issued by Suffolk County Department of Health Services (SCDHS). Since the perched groundwater at Camp Hero would not likely meet those standards, the installation of potable wells within the site would most likely not be allowed by SCDHS. These requirements reinforce the Proposed Plan's Human Health Risk Assessment (HHRA) conclusion that further evaluation of residential exposures to site-related contaminants of concern is not warranted. I request that the SCDHS requirements for installation of private wells be included in the Proposed Plan as supporting information for the conclusion that consumption of groundwater at Camp Hero is not a public health exposure concern.

- The Proposed Plan's HHRA conclusion that perched groundwater at Camp Hero is not suitable as a potable water source not only eliminates residential exposures as a concern, it also eliminates potential risks for the other current/future exposure groups noted in the HHRA. Therefore, I request that trespassers, park employees, maintenance workers, indoor workers, construction workers, and recreational users also be noted as groups that can be eliminated at potential current/future exposure concerns in the HHRA conclusions.

If you have any questions, please contact me at (518) 402-7860.

Sincerely,

Steven Karpinski
Bureau of Environmental Exposure Investigation
Center for Environmental Health

ec: C. Bethoney / e-File
C. Westerman – NYSDOH MARO
A. Rapiejko / A. Juchatz – SCDHS
E. Obrecht – NYSDEC Central Office
W. Parish – NYSDEC Region 1

NYS Parks Comments on Camp Hero FUDS Proposed Plan

From: Rupp, Julia M CIV (USA) <Julia.M.Rupp@usace.army.mil>
Sent: Friday, September 13, 2019 12:08 PM
To: Martin, Amanda (Chelmsford) <Amanda.Martin@aecom.com>; MacEwan, Mark <Mark.MacEwan@aecom.com>
Cc: Mion, Patrick A Jr CIV USARMY CENAE (US) <Patrick.J.Mion@usace.army.mil>; Auld, Cynthia A CIV USARMY USACE (US) <Cynthia.A.Auld@usace.army.mil>; Goepfert, Gregory J CIV USARMY CENAN (USA) <Gregory.J.Goepfert@usace.army.mil>
Subject: Comments from NY Parks on PP
Importance: High

Mark/Amanda,

We finally received some comments from the Parks. Two comments were USACE/administrative and Greg and I are handling. A third comment "Comment 1" on their list delves into technical questions that we need AECOM to respond to asap. We plan to send a response back to the Parks on Monday so we can finalize the PP. Below the line is their comment; USACE input is in CAPS. "CA" is Cashin Associates (Marc Califano), the consulting firm who provided review.

_____

Cashin Associates, P.C. (CA) performed a preliminary review of the Final Remedial Investigation Report for Camp Hero dated January 2019, prepared by U.S. Army Corps of Engineers (USACOE).

The Final Remedial Investigation Report contained the results of hundreds of surface soil, subsurface soil and groundwater samples and extensive field screening indicating that an intensive investigation had been performed.

CA conducted a quick overview of these results, and there did not appear to be any sampling results that would contradict USACOE findings that "No Further Action Is Required" for the identified AOC's as no chemicals of concern identified could be attributed to a CERCLA release except for DU01, AOC010, AOC 107, and AOC B113.

However, CA identified several possible concerns:

1. CA's review of the Final Remedial Investigation Report indicated that Battery 112 was not accessed and that UST 36 and UST 37 were not addressed. CA recommends that Battery 112 be accessed and environmental sampling be performed if warranted. Additionally, what is the status of UST 36 and UST 37 located at or adjacent to Battery 112?

LOCATED OUTSIDE BATTERY AND CLOSED 1994 - 94-06038 IN TABLE 3-1 - CONFIRM CLOSURE IS TRUE BATTERY 112 - COULDN'T ACCESS FOR SAMPLING. WAS THERE PREVIOUS DATA? NEED TO CHECK.

_____

As I stated above, items 2 and 3 were more administrative (e.g., requesting to see DOH/DEC comments and asking about status of DU01 and removal actions follow-up at Battery 113, B107 and B110) and USACE is handling response to these. There were 3 items on the list, not "several."

I am on my cell today if you would like to discuss. We appreciate AECOM's prompt attention to this matter!

Have a great weekend!

Thanks!

_____
Julie Rupp, PG
Technical Lead
Geo-Environmental Engineering
US Army Corps of Engineers
New England District
(978) 318-8962
julia.m.rupp@usace.army.mil

US Army Corps
of Engineers ®

New England District
696 Virginia Road
Concord, Massachusetts
01742-2751

REVIEW COMMENTS

Project Name: Camp Hero
Location: Camp Hero, Montauk, New York
Document Name: Proposed Plan
Prepared By: AECOM

Date: 20 August 2019
Reviewer: Steven Karpinski, NYSDOH

No.	Ref. Page / Para.	COMMENTS	RESPONSE	RESOLUTION
1.	Page 3 (Para. 7), Page 4 (Para. 1)	The Proposed Plan notes on pages 3 and 4 that a potability analysis was conducted as part of the Remedial Investigation (RI) and concluded that the perched groundwater lenses at the site are not feasible sources of potable water supply due to poor well yield, recharge, and water quality. The RI also notes that the perched groundwater lenses beneath Camp Hero are not hydraulically connected to any drinking water resources in Suffolk County. The potability analysis provided in the RI (located in Appendix K) also notes that before a potable groundwater well could be installed at Camp Hero, the well would be required to conform to standards for community or private water wells issued by Suffolk County Department of Health Services (SCDHS). Since the perched groundwater at Camp Hero would not likely meet those standards, the installation of potable wells within the site would most likely not be allowed by SCDHS. These requirements reinforce the Proposed Plan's Human Health Risk Assessment (HHRA) conclusion that further evaluation of residential exposures to site-related contaminants of concern is not warranted. I request that the SCDHS requirements for installation of private wells be included in the Proposed Plan as supporting information for the conclusion that consumption of groundwater at Camp Hero is not a public health exposure concern.	Information was added to the Proposed Plan to summarize the SCDHS requirements for installation of private wells.	

US Army Corps
of Engineers ®

New England District
696 Virginia Road
Concord, Massachusetts
01742-2751

REVIEW COMMENTS

Project Name: Camp Hero
Location: Camp Hero, Montauk, New York
Document Name: Proposed Plan
Prepared By: AECOM

Date: 20 August 2019
Reviewer: Steven Karpinski, NYSDOH

No.	Ref. Page / Para.	COMMENTS	RESPONSE	RESOLUTION
2.		The Proposed Plan's HHRA conclusion that perched groundwater at Camp Hero is not suitable as a potable water source not only eliminates residential exposures as a concern, it also eliminates potential risks for the other current/future exposure groups noted in the HHRA. Therefore, I request that trespassers, park employees, maintenance workers, indoor workers, construction workers, and recreational users also be noted as groups that can be eliminated at potential current/future exposure concerns in the HHRA conclusions.	This information was added to the Proposed Plan as requested.	

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New England District
696 Virginia Road
Concord, Massachusetts
01742-2751

REVIEW COMMENTS

Project Name: Camp Hero
Location: Camp Hero, Montauk, New York
Document Name: Proposed Plan
Prepared By: AECOM

Date: 5 August 2019
Reviewer: Nick Acampora, NYSDEC

No.	Ref. Page / Para.	COMMENTS	RESPONSE	RESOLUTION
1	Page 6, Para. 1	I recommend that the language on Page 6, first full paragraph, first line be changed from "A NYSDEC Pollution Complaint Number (PC-1602757) is open for LNAPL..." to read simply "NYS DEC Spill Number 16-02757 is open for LNAPL..." . We do not refer to our Spill Numbers as a Pollution Complaint Number (PC), so this reference should be removed to prevent any confusion.	"Pollution Complaint Number" has been changed to "Spill Number" in the Proposed Plan, as requested.	
2	Table 1	To confirm, the issues that will be handled separately from the CERCLA and remain "open" are identified in Table 1 of the report as: a. DU-01: Former Building 203. b. AOC-010: Building 10 Kitchen/Mess Hall c. AOC-107: Building 107 Electrical Substation d. AOC-B113: Battery 113.	It is correct that these areas/buildings will be handled separately from CERCLA. A Technical Memorandum is being prepared for the former Building 203. A separate work plan will be submitted for Building 10, Building 107, and Battery 113.	

US Army Corps
of Engineers ®

New England District
696 Virginia Road
Concord, Massachusetts
01742-2751

REVIEW COMMENTS

Project Name: Camp Hero
Location: Camp Hero, Montauk, New York
Document Name: Proposed Plan
Prepared By: AECOM

Date: 13 September 2019
Reviewer: New York State Parks Recreation & Historic Preservation

No.	Ref. Page / Para.	COMMENTS	RESPONSE	RESOLUTION
1.	General	CA conducted a quick overview of these results, and there did not appear to be any sampling results that would contradict USACOE findings that "No Further Action Is Required" for the identified AOC's as no chemicals of concern identified could be attributed to a CERCLA release except for DU01, AOC010, AOC 107, and AOC B113. However, CA identified several possible concerns: CA's review of the Final Remedial Investigation Report indicated that Battery 112 was not accessed and that UST 36 and UST 37 were not addressed. CA recommends that Battery 112 be accessed and environmental sampling be performed if warranted. Additionally, what is the status of UST 36 and UST 37 located at or adjacent to Battery 112?	NYSDEC DER Spill Report Case 94-06038 dated 08/03/1994 documented that USTs 36 and 37 have been closed by the NYSDEC DER Petroleum Program. The USTs were located within concrete vaults outside of Battery 112. Both tanks were removed and approximately 300 cubic yards of petroleum-impacted soil were removed and disposed of in the fall/winter of 1993-1994 by the U.S. Army Corps of Engineers. With regard to Battery 112, the 1998 "Feasibility Study, Hazardous Materials Survey, Preliminary Report" (Cashin Associates, 1998) indicated that there appeared to be residual oil staining on the floor of Battery 112, which may have contained PCBs; however, no tanks or waste drums were observed at that time. A survey of Battery 112 was included in the Phase I RI Work Plan (2016) to confirm that ASTs were not present, complete a visual inspection for evidence of PCB-contaminated stained concrete, and collect PCB wipe samples. However, Mr. Tom Dess, Camp Hero Park Superintendent, indicated that the building was completely seals and that access was not possible; therefore, no sampling was completed in Battery…	

US Army Corps
of Engineers ®

New England District
696 Virginia Road
Concord, Massachusetts
01742-2751

REVIEW COMMENTS

Project Name: Camp Hero
Location: Camp Hero, Montauk, New York
Document Name: Proposed Plan
Prepared By: AECOM

Date: 13 September 2019
Reviewer: New York State Parks Recreation & Historic Preservation

No.	Ref. Page / Para.	COMMENTS	RESPONSE	RESOLUTION
		(#1 Continued)	… 112. There are no previous data available for PCBs from the floor stains in Battery 112. However, during the Phase I RI field investigation, samples were collected for PCBs in the vicinity of Battery 112 (refer to the Phase I Investigation Field Report, Appendix E of the RI Report, for additional details). Surface soil, subsurface soil, and grab groundwater samples were collected from the site-wide waste disposal system at a series of cesspools that discharged from Battery 112 (locations WDS-SB25, -SB26, and -SB27). These samples were all non-detect for PCBs. Additionally, surface and shallow subsurface soil samples were collected from two drum locations near Battery 112 (AOC H-18, approximately 75 feet north of Battery 112, and AOC H-1, approximately 300 feet south of Battery 113). These samples were also non-detect for PCBs. Therefore, although Battery 112 was not accessed for the intended sampling work, we submit that the sampling undertaken near Battery 112 does not indicate evidence of a release to the environment.	

US Army Corps
of Engineers ®

New England District
696 Virginia Road
Concord, Massachusetts
01742-2751

REVIEW COMMENTS

Project Name: Camp Hero
Location: Camp Hero, Montauk, New York
Document Name: Proposed Plan
Prepared By: AECOM

Date: 13 September 2019
Reviewer: New York State Parks Recreation & Historic Preservation

No.	Ref. Page / Para.	COMMENTS	RESPONSE	RESOLUTION
2.	General	CA understands that the identified LNAPL at DU01 will be addressed under a separate Remedial Action Plan and that AOC B010, AOC 107 and AOC B113 will also be handled under a separate contract. However, it should be noted that CA has not received or reviewed these remedial investigation documents as of today.	You are correct; CA has not received these documents. A document proposing our approach to LNAPL at DU01 will be provided by the end of this month (Sept 2019); we expect the document to identify that the process of natural source zone depletion is ongoing at the DU01 location--- a copy of that document will be provided for review. We are expecting to award a separate contract this fall (2019) to complete actions to address AOC B010, 107, B113---when workplans are drafted, they will be provided for review.	
3.	General	CA would also like to review the NYSDEC and NYSDOH comments that Gregory J. Goepfert, P.E., PMP, Project Manager for the USACOE alludes to in his August 26, 2019 E-mail. If the NYSDEC and NYSDOH have approved the Final Remedial Investigation Report for Camp Hero, it is unclear whether these reported comments refer to the Final Remedial Investigation Report dated January 2019 or the Proposed Remedial Action Plans for the outstanding AOC's mentioned above.	The attached emails include the comments (from NYSDEC and NYSDOH) that I alluded to on the Proposed Plan (in my August 26, 2019 email) ; the plans for the outstanding AOC's mentioned above (i.e, your item/comment # 2) will be separately provided for review.	

From: Goepfert, Gregory J CIV USARMY CENAN (USA)
Sent: Wednesday, September 25, 2019 12:10 PM
To: Muff, August (PARKS)
Cc: Dess, Thomas (PARKS); Foley, Brian X (PARKS); Gregory Greene; Rupp, Julia M CIV (USA)
Subject: RE: Camp Hero - Final Proposed Plan

August,
Thank you for the reply. We will proceed on making arrangements for the public meeting at the Montauk Library on October 24, 2019 at 6:00 PM.
Respectfully,

Greg G.

Gregory J. Goepfert, P.E., PMP
Project Manager
U. S. Army Corps of Engineers
New York District (CENAN-PP-E)
26 Federal Plaza
17th Floor – Station 17 401-2
New York, New York 10278

(O) 917-790-8235
(C) 732-841-8062

-----Original Message-----
From: Muff, August (PARKS) [mailto:August.Muff@parks.ny.gov]
Sent: Wednesday, September 25, 2019 11:57 AM
To: Goepfert, Gregory J CIV USARMY CENAN (USA) <Gregory.J.Goepfert@usace.army.mil>
Cc: Dess, Thomas (PARKS) <Thomas.Dess@parks.ny.gov>; Foley, Brian X (PARKS) <Brian.Foley@parks.ny.gov>; Gregory Greene <ggreene@ca-pc.com>
Subject: [Non-DoD Source] FW: Camp Hero - Final Proposed Plan

Greg,

Parks and their consultant, Cashin Associates have no additional comments with the Final Version of the Proposed Plan for Camp Hero.

Regards,

August H. Muff, R.A., Associate Architect New York State Office of Parks, Recreation and Historic Preservation
625 Belmont Avenue
West Babylon, NY 11704
631-321-3507 (O) 631-321-3728 (F)

-----Original Message-----

From: Goepfert, Gregory J CIV USARMY CENAN (USA) <Gregory.J.Goepfert@usace.army.mil>
Sent: Wednesday, September 25, 2019 10:50 AM
To: Muff, August (PARKS) <August.Muff@parks.ny.gov>
Subject: FW: Camp Hero - Final Proposed Plan

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

August- is Parks good with this now? Thanks, Greg.

-----Original Message-----
From: Goepfert, Gregory J CIV USARMY CENAN (USA)
Sent: Friday, September 20, 2019 12:47 PM
To: August.Muff@parks.ny.gov; john.swartwout@dec.ny.gov
Cc: Foley, Brian X (PARKS <Brian.Foley@parks.ny.gov>; Dess, Thomas (PARKS <Thomas.Dess@parks.ny.gov>; Rupp, Julia M CIV (USA) <Julia.M.Rupp@usace.army.mil>; NAEFUDSFILE NAE <NAEFUDSFILE@usace.army.mil>; Karpinski, Steven (HEALTH) <steven.karpinski@health.ny.gov>; Acampora, Nick (DEC) <nick.acampora@dec.ny.gov>; MacEwan, Mark <Mark.MacEwan@aecom.com>; Martin, Amanda (Chelmsford) <Amanda.Martin@aecom.com>
Subject: Camp Hero - Final Proposed Plan

Good Afternoon, August and John-

The attached .pdf file is the final version of the Proposed Plan that we'd like to release for public review. Please take one last look at this, and let me know if you concur that we've addressed your comments.

For your convenience, the attached word file is a compilation of our response to all comments received.

Please let me know, no later than next Tuesday, September 24th, if you concur that your comments have been addressed.

Thank you, in advance, for your cooperation.

Sincerely,

Greg G.

Gregory J. Goepfert, P.E., PMP
Project Manager
U. S. Army Corps of Engineers
New York District (CENAN-PP-E)
26 Federal Plaza
17th Floor - Station 17 401-2
New York, New York 10278

(O) 917-790-8235
(C) 732-841-8062

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau A
625 Broadway, 12th Floor, Albany, NY 12233-7015
P: (518) 402-9625 I F: (518) 402-9627
www.dec.ny.gov

April 21, 2022

Ms. Julia Rupp, PG
US Army Corps of Engineers
New England District
696 Virginia Road
Concord, Ma 01742-2751

RE: Draft Final Phase IV Remedial Investigation Report Addendum, Camp Hero, Montauk, New York, Formerly Used Defense Site (FUDS) Property No. C02NY0024, NYSDEC ID # 152231

Dear Ms. Rupp:

The New York State Departments of Environmental Conservation and Health have reviewed the *Draft Final Phase IV Remedial Investigation Report Addendum*, dated March 2022. We have no comments and find the report to be acceptable. If you have any questions, please contact me at (518)402-9570.

Sincerely,

John B. Swartwout

John B. Swartwout, PE
Section Chief

ec: J. Hime/ A Rapiejko/ A. Juchatz, SCDHS
R. Mustico, DEC
C. Engelhardt, DEC Reg. 1
N. Acampora, DEC Reg. 1
C. Bethoney, NYSDOH
J. Robinson, NYSDOH
E. Weigert, NYSDOH MARO

From: Busciolano, Ronald <rjbuscio@usgs.gov>
Sent: Monday, April 25, 2022 2:59 PM
To: Rupp, Julia M CIV USARMY CENAE (USA) <Julia.M.Rupp@usace.army.mil>
Cc: Busciolano, Ronald <rjbuscio@usgs.gov>
Subject: [URL Verdict: Neutral][Non-DoD Source] Re: [EXTERNAL] RE: Camp Hero Draft Final Remedial Investigation Report Addendum

Julia, I have no additional comments on this final draft. Great work by everyone!!

One thing, we had discussed the idea of potentially saving some of the wells for the USGS and SCDHS to use for future monitoring. Is this still being discussed, and if so, there are a few sites that might be important.

We can discuss this further once you get any comments back from the others. Thaks.

Ronald Busciolano, Supervisory Hydrologist
U.S. Geological Survey - New York Water Science Center
2045 Route 112, Building 4
Coram, NY 11727-3085
Phone: (631) 736-0783, ext. 104
Fax: (631) 736-4283
http://ny.usgs.gov

From: Swartwout, John (DEC) <john.swartwout@dec.ny.gov>
Sent: Thursday, August 4, 2022 1:54 PM
To: Rupp, Julia M CIV USARMY CENAE (USA) <Julia.M.Rupp@usace.army.mil>
Cc: Robinson, Johnathan M (HEALTH) <Johnathan.Robinson@health.ny.gov>
Subject: [URL Verdict: Neutral][Non-DoD Source] RE: DRAFT FINAL Decision Document, CAMP HERO, MONTAUK, NEW YORK, FORMERLY USED DEFENSE SITE (FUDS) PROPERTY No. C02NY0024

Julie-

I got my document for review and was looking at it yesterday. It generally looks good but I did notice a couple of locations in the Responsiveness Summary section where it looked like there were minor errors in the public meeting transcript which had been incorporated into the Decision Document text.

1. Greg Goepfert's Response to Comment 5 (given at the Public Hearing): The first sentence reads "Actually, this site 17 [Camp Hero] is a formally used defense site [FUDS]." You should correct "formally" to read "formerly." Also, it should be properly capitalized (Formerly Used Defense Site).

2. Comment 14: The first sentence of the Public Meeting attendee's comment refers to "the department of environmental concern." Since the same comment includes two more references to "the Department of Environmental Conservation after that, it's apparent that the reference should also read "the Department of Environmental Conservation."

3. General Comment on Responsiveness Summary: The terms "public meeting" and "public hearing" are used interchangeably in the comments and responses. I suggest sticking with "public meeting" for consistency. Section 2.3, Community Participation, refers to it as a "public meeting." The Part 3 introductory text initially calls it a "Public Meeting and Hearing" and subsequently refers to it as a "public meeting," which I think is fine.

John

John B. Swartwout, P.E.
Chief, Section C
Remedial Bureau A
Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway, Albany, NY 12233-7015
P: 518-402-9570 | F: 518-402-9627| john.swartwout@dec.ny.gov

www.dec.ny.gov |

US Army Corps of Engineers ®

New England District
696 Virginia Road
Concord, Massachusetts
01742-2751

REVIEW COMMENTS

Project Name: Camp Hero FUDS
Location: Montauk, NY
Document Name: Decision Document
Prepared By: AECOM

No.	Ref. PDF Page / Para.	COMMENTS	RESOLUTION	RESPONSE
Reviewer: John Swartout (New York Department of Environmental Conservation) Date: 4 August 2022				
1.	p. 33	Greg Goepfert's Response to Comment 5 (given at the Public Hearing): The first sentence reads "Actually, this site 17 [Camp Hero] is a formally used defense site [FUDS]." You should correct "formally" to read "formerly." Also, it should be properly capitalized (Formerly Used Defense Site).		Change incorporated
2.	p. 42	Comment 14: The first sentence of the Public Meeting attendee's comment refers to "the department of environmental concern." Since the same comment includes two more references to "the Department of Environmental Conservation after that, it's apparent that the reference should also read "the Department of Environmental Conservation."		Change incorporated through the use of "[NYSDEC]".
3.	General Comment	General Comment on Responsiveness Summary: The terms "public meeting" and "public hearing" are used interchangeably in the comments and responses. I suggest sticking with "public meeting" for consistency. Section 2.3, Community Participation, refers to it as a "public meeting." The Part 3 introductory text initially calls it a "Public Meeting and Hearing" and subsequently refers to it as a "public meeting," which I think is fine.		Agree and change incorporated.

Appendix B

Public Meeting Transcript

ARMY CORPS OF ENGINEERS

FORMERLY USED DEFENSE SITE PROGRAM

PROPOSED PLAN

CAMP HERO, MONTAUK, NEW YORK

PROJECT #C02NY002403

October 24th, 2019

6:00 PM

Meeting held at

Montauk Library, 871 Montauk Highway, Montauk, NY

PRESENTATION BY:

GREGORY GOEPFERT, Project Manager

REPORTED BY: Sara Galante

MR. GOEPFERT: Good evening, everyone. Thanks for making the time to come out to listen to the presentation about the work we've performed at Camp Hero over the last several years.

My name is Gregory Goepfert, project manager for the Camp Hero Formerly Used Defense Site. And I want to thank Ms. DiPaolo and the citizens of Montauk for allowing the Army Corps to use your facility this evening. So thank you very much.

We're conducting this public participation in our planning process. Therefore, your verbal and written comments are welcome. Should you have any comments or questions, please identify yourself and pose your comments or questions for the record. Alternatively, you can submit your comments in writing. All comments will be responded to. We have a public comment period on the document that I'm discussing tonight, on the proposed

plan, that ends on November 15th. So I would have to receive your comments by November 15th, in order to respond to them appropriately in our decision documents.

So let me get started by presenting a brief overview of the work that we undertook at the former Camp Hero Formerly Used Defense Site, which is now known as Camp Hero State Park.

So most of you probably know about the site history and background of Camp Hero. In '42 it was established as a coastal defense installation, and subsequently, ^ ^ used at the site took place and then the property was deeded back to the State of New York and became used as Camp Hero State Park. So I don't think any of this history or background is news to anyone here.

So the process that we undertook, this project deals with chemicals of concern that may have been associated with the army or the DoDs use of the

site Department of Defense use of the site. And we talk too much in acronyms, but one acronym that is used consistently is the Comprehensive Environmental Response, Compensation, and Liability Act. That is an actual law and that law prescribes the processes of investigating a site such as these.

And the assessment goes in a number of stages. It starts with preliminary assessment and working down to a decision, and ultimate remedial actions, if necessary.

So when a remedial investigation concludes that there's a lack of human health site risks, as has happened here, this stage is skipped, feasibility study, and we go right to a proposed plan. And the proposed plan is what we're going to be talking about tonight. Ultimately, after the proposed plan is issued and the public gets to comment on our plan, the Corps of Engineers will

issue a decision document subsequently and address any of the public's concerns.

In this case, at Camp Hero, the remedial design and remedial action components will not be address because at this point we're going to be proposing no further actions be taken. So we do not expect any remedial design or remedial actions going forward at this site in this process.

So just getting an overview of what we have actually accomplished, we did a comprehensive historical search that identified 47 areas of concern. Our investigations were conducted over the last several years in three phases and collected over 1,300 samples, which included over 700 soil samples, over 300 groundwater and surface water samples, we looked at over 700 historical drawings to see if there were any activities of the Department of Defense that may have caused any issues at the

site, and we also took into consideration a study that was done by the New York State Parks consultant by the name of Cashin in 1998. It was a pretty thick study where they identified areas of concern that they wanted us to look into a little bit further. So those areas were incorporated into our plan for our investigation.

Phase I started in June of 2016. And the main function of that phase was to identify whether contamination was present or absent and to do a background study for soils, to just find out if -- to obtain data for areas where DoD, Department of Defense operations place, so that we can compare, you know, those areas where actions did not take place or defense didn't use those areas and compare them to the other areas, operational areas of the site. So that's what the background study -- why that's important.

The second phase dealt with a few

other areas. It dealt with a petroleum focused investigation at Building 203, which I'll explain later, is also called "Decision Unit Number 1". We conducted that background groundwater study, which is the same idea as doing a background soil study, except that it's for groundwater instead of soils.

We came to the conclusion that 25 potential areas of concern did not require an additional investigation, and based on the data that we analyzed, 22 areas proceeded to the next phase of the investigation. So as you could see, this is a very methodical approach towards investigating the site.

Phase III was conducted in the June July 2018 timeframe, where 22 AOCs proceeded to this phase of investigation. Comprised of 18 Decision Units, these are areas that are basically squares cut out on a map that included several areas of concern. Stream exposure areas, when I talk about

stream, I'm talking, like, a trout stream or a water body, okay?

The decision units are really unbiased. One or one and a half acre squares that include maybe more than one area of concern. And then there was a groundwater sampling that was done over 43 different monitoring wells across the site, and background surface water and sediment samples were also taken in this phase.

I should mention that some decision units that were established take in more than one area of concern, which is why the numbers don't add up perfectly.

So after we get all this data, we examine all of it in what we call a risk assessment. And a risk assessment basically makes a judgment based upon numerical criteria on whether human health and ecological risks exist at the site. And several items were looked at in more detail, specifically metals, to find out: Are they naturally occurring

or are the metals something that result from the prior DoD, Department of Defense, operations at the site.

So there's a comparison. This statistical evaluation that I'm talking about is a comparison to background conditions. And this class of compounds is called polycyclic aromatic hydrocarbons, basically is a mouthful, but the PAHs are generally compounds that are associated with creosote or asphalt, that sort of thing. What we wanted to find out is if anything that we found that is related to PAHs, was it related to something that the Army of the Air Force did? Or was it just, you know, something that was used as intended, like asphalt or creosote. And generally, that's what we found, that those class of compounds were not something that was, like, a spill or a release, but more of an intended use situation.

So that brings me to my next slide.

The definition of a release. You know, as part of our investigation, we wanted to know if there was an actual release took place, if the Department of Defense was responsible, and if such a release would result in a human health or ecological risk condition. So that was something that we kept in mind as the study grew on.

The other part of the study was a potability analysis, which is very simply, to determine, is the water -- at Camp Hero, is the water drinkable? And, you know, the bottom line to that is that the water that's used for consumption in this area is derived from much deeper aquifer. The shallow groundwater at Camp Hero is located in groundwater lenses that are shallow and not continuous. It does not provide water for local drinking water. And the shallow water in the Camp Hero area doesn't conform to standards for community or private water wells because

of the very low well yield, they call it. The wells don't produce that much water, and they don't recharge very quickly because of the low flow of groundwater. And the water quality, and by water quality I'm not talking with reference to any contaminates from DoD, I'm talking about the natural water quality in the area, which is very -- has a lot of fines and solids associated.

So this is kind of a drawing that shows what the underlying groundwater looks like. We have -- near the surface, we have a perched water lenses at Camp Hero, under which there's confining till, and then underneath this confining till is a confined freshwater lens. And that's generally where water for consumption would be taken. So anything at Camp Hero is located above this confining till, and does not make it down to the freshwater lenses that supply local drinking water.

So as I just said, the perched groundwater lenses are not hydraulically connected, which means there's no connection; one type of water can't get to the other with the drinking water sources in Suffolk County. And the deeper productive confined aquifer is separated by that layer that I showed you previously, this confining till area, which generally ranges from six feet to more than 100 feet in thickness. And there's no indication that this deeper aquifer has been compromised by the activities of the Defense Department.

So with an overview of the report, as I just mentioned, we have 1,300 soil, sediment, surface water, and groundwater samples collected between May 2016 and June 2017. We saw that no decision units or stream exposure areas had chemicals with levels of concern that would indicate that there was any actionable risk. And the area of

Decision Unit Number 1, which is near Building 203, where there was a previous spill of diesel fuel, is not addressed under the CERCLA process, but it's going to be addressed under the New York State Department of Environmental Conservation spills program. CERCLA does not classify diesel fuel as a CERCLA hazard substance, which makes it be addressed under a different program. So we do -- the programs are very similar in nature in any case.

We have drafted a separate report indicating that there's natural degradation taking place of the residual fuels and the perched groundwater, and that report is currently under agency review.

So the conclusion of our report that was documented in our proposed plan, is that since we don't have any actionable risks on the site, we are not recommending any further actions at any of the sites at Camp Hero. And this is

after this very lengthy and very specific investigation.

I mentioned before that, separately, we're looking at one area where there was a fuel spill. There were two 25,000 gallon underground storage tanks and a lube oil tank. The Army Corps went out and estimated impacted soils and removed over 2,500 cubic yards of material. Depending on the size of the dump truck that was sent, I wasn't around at the time, but if it was 25 yarders that were used, then we're talking about 100 trucks left the site with impacted material.

In '95, the State Department of Environmental Conservation closed the spill case associated with this area. When we were doing investigations in that area, Building 203, Decision Unit 1, we did some work which was associated with laser induced fluorescents, to try and get a better handle as to what remaining impacts were

at that this location. And when we did that, we opened up another case file at the State so this issue could be tracked.

This figure shows, in the red, basically, the perimeter of the impacted perched groundwater, which is very localized since it really doesn't move that much. And this is what our laser-induced fluorescents investigation work helped us to find.

So I should tell you what -- you see all these acronyms again. I think things need to be explained. Light non-aqueous phase liquid, LNAPL, is in the perched water areas, then it's not mobile, it's protected from groundwater in a confining layer. Light non-aqueous phase liquids or contaminated fuel oil does dissolve in water, it has a lower density than water, so it floats on water. And if it hits the ground, it stops at the top of the groundwater table. So that's kind of the definition

of light non-aqueous phase liquid, and that's residual -- that's what we're dealing with at this location.

So as I said before, we removed the underground storage tanks in 1993. There is some residual LNAPL that still exists in the immediate area of the building, but it is stable and it's not migrating and is undergoing natural biodegradation. And the FUDS program, Formerly Used Defense Site Program, the program that I represent, is recommending that we not take any further action at this time. Those active processes are taking place. And the State is reviewing a document where we detail that conclusion.

So concluding the message that we're sending in this proposed plan is that we have evaluated over 47 potential areas of concern at the site, collected over 1,300 samples of environmental groundwater water, sediments, and soils. And we submitted all those results to a

risk assessment. And we found that based on those results, we are not proposing any further action under our program.

As I said before, the residual petroleum at Building 203 being addressed under the New York State Spills Program, is something that's addressed outside of CERCLA. But again, our report is undergoing a review at this time.

The proposed plan was provided here on the table tonight. It's also available on our website at the Army Corps NY District website. We also have the larger binders that are on that table is the fabric of the entire report of our investigation over the last several years. That report is also uploaded on the website, if you want to get into more detail of what the investigation entailed.

We welcome any of your comments, either written or verbal, on the

proposed plan. With our comment period that ends on November 15, whether you give me comments tonight or you send them in the mail, I need to have them post-marked by November 15th. And then we will provide responses to your comments in a response of the summary and ultimately, in a decision document for the site.

So I told you before that there's a lot of acronyms and abbreviations that we use. Hopefully, I got it down to a point that people can understand. But if you have any other questions with respect to the definitions of these things, we put that at the end of our presentation here.

I have one gentlemen, sir?

MR. ENGSTROM: Charles Eric Engstrom.

MR. GOEPFERT: Could you direct your name again to the stenographer?

THE COURT REPORTER: He's good, thank you.

MR. ENGSTROM: 203, is that the generator building?

MR. GOEPFERT: Yes.

MR. ENGSTROM: Did you test for promium and antifreeze and stuff like that there? Because I heard rumors from guys that actually work there who gave direct to discharge stuff right on the ground. That's also the source of a 10,000 gallon fuel oil spill going all the way down to Oyster Pond, that according to your document, looks connected to the aquifer that we were using.

And one other part of the question is: Have any of the contaminates actually been plotted on a map to see if there's a general trend of where these things are and where they're going? I know you said it's all unperched water, but it was actually a runoff for the fuel all the way down to Oyster Pond back in -- what was that -- the 80s? Just before -- just before we moved in

there, I think it was, or just after we moved in there, about '84, I think it was. It was a 10,000-gallon discharge, approximately, from the large aboveground storage tank that was at the generator station. Did they do core samples immediately adjoining that area, next to that? That's it.

Oh, were there any carcinogenics identified in any of these things? Because we have an abnormal amount of cancer up in that small residence up there. 27 families and it's a little unheard of to have, like, 20 percent of them that have cancer. That's it.

MS. DEVEGLIO: I have a couple of questions. Lisa DeVeglio.

You said in 1994, I believe it was, that you took 100 truckloads of dirt out of there?

MR. GOEPFERT: '93 and '94. '94 was the over excavation, '93 was the initial --

MS. DEVEGLIO: I live there, I

never saw one truck leave that place ever. I live up there. I've lived there since '87, and I never -- I mean, I think I would have saw these big trucks. I certainly saw them coming in and dumping the dirt on the beach in town. I never saw them going out of my neighborhood ever. So that's a little weird to me.

And also, all this study is being done because, why? Because of a proposed plan to put a campground back there? Or why all of a sudden there's being a study done?

MR. GOEPFERT: Actually, this site is a formally used defense site. These sites have been in the queue for many, many years. We just happened to get funding about three years ago to get started with this investigation because the defense department is trying to close out all these sites by the year 2020, okay? So this -- Camp Hero, I think it was towards the end of the

whole list of sites that we had in New York. Of course, this process started back in the early '90s, okay? Here we are, 20 years, almost 30 years later, but the process started at that time. And the investigation is really trying to wrap everything up at the site.

So really, the only thing that moved us to get out here and to get this site prioritized was really the advocacy of the State of New York to try to help us get more sites done in New York State. So it had nothing to do with what anybody's plan for the site was, to the best of my knowledge.

Yes, sir?

MR. ENGSTROM: Again, Charles Eric Engstrom.

Does this range to the old dump at Flamingo where the Army deposited most of their junk? The old town dump on Flamingo Road? I hear they buried a ton of stuff over there from, like, my grandfather and stuff like that. I

heard this stuff.

MR. GOEPFERT: That -- maybe you could repeat the comment.

MR. ENGSTROM: The old dump, you know where the old dump on Flamingo?

UNIDENTIFIED RESIDENT: The old dump, yeah.

MR. ENGSTROM: Well, it's an old town dump on Flamingo Road that the Army used to dump all their stuff. I was wondering if that encompassed that area too?

MR. GOEPFERT: Well, the report that was written, I don't have any recollection of that issue being addressed in the report, but we will look into that.

MS. MCCARRON: Liz McCarron.

Do you have a list of the things that you tested for? I came a little late, I didn't know if you mentioned it.

MR. GOEPFERT: Yes. Actually, in that small book, the proposed plan handout that's on the table. We'll hand

you a copy. In one of the attachments is a list of all the contaminates.

MS. MCCARRON: That we can take with us?

MR. GOEPFERT: You can take it with you.

MS. MCCARRON: And another question. All that dirt that you said was removed, did they replace it with dirt? Did they bring dirt back in to --

MR. GOEPFERT: Yes, with clean material. To the best of my knowledge, yes. There's a separate report that documents all that work that I can make available to you.

MS. MCCARRON: It shows where they took the dirt out and what happened?

MR. GOEPFERT: I believe so, yes.

MS. MCCARRON: I'd like to see that.

MR. GOEPFERT: Sure.

Yes, sir?

MR. ALBRONDA: Mike Albronda.

What about the wells? Did you take

any samples in the base itself where our houses are there? Are there any -- can we find out what you found in our area itself?

MR. GOEPFERT: Well, I mean, all the results of the wells are in the report --

MR. ALBRONDA: Do you know --

MR. GOEPFERT: -- we did not sample any wells in anyone's personal residences.

MR. ALBRONDA: Just the groundwater there, because we have had a lot of problems up there.

MR. GOEPFERT: Right. So all of the results of all the wells that we tested are in the report. And for ease of use, you can look in the report and it has all the wells listed where the tests were done. Tests were not done of any private residential areas.

Yes, sir?

MR. DEVEGLIO: My name is Robert DeVeglio.

We had -- up in that area we had our own kind of water district that it was three major wells that a whole development drew off of. And nobody up there has a private well. And I think that's what Mike was asking. Were those wells tested?

We're currently on the Suffolk County water system now, mostly. But originally, we had our own separate water district where we drew off of our own separate wells up in that area. And I think that's what he was concerned about.

MR. JOHANN: Right.

MR. DEVEGLIO: Were those wells tested? So that's the question.

MR. GOEPFERT: Well, I think that question would need to be directed to Suffolk County. If somebody tested those wells, it wasn't the Army Corps that tested those wells.

MR. JOHANN: Just to follow up on that, my name is Ed Johann.

I live adjacent to the camp and I have a well that I'm drawing my water at 188 feet. You get into water that's potable, probably at about 135 feet, adjacent there, I'm right off the fence line.

I'm wondering, what they're wondering, is when you were doing those testing was any testing done, even at your own wells that went down 135 feet or was it basically just the perched water?

MR. GOEPFERT: It's the perched.

MR. JOHANN: I know you said there wasn't any leaking, but we're talking about 50 years of potential -- we're wondering, I'm not on public water, I'm still getting water out of the ground, so are my neighbors. We're all wondering if our water has been tested, in any way, by the government? If it hasn't been then we have to look --

MR. GOEPFERT: Are you to the west of Camp Hero?

MR. JOHANN: I am slightly to the west, yes.

MR. GOEPFERT: Okay. So Camp Hero water would not flow in that direction.

MR. JOHANN: Part of this whole -- all the water that's perched water there works it's way to Oyster Pond.

MR. GOEPFERT: Correct.

MR. JOHANN: So all part of that watershed, it all runs down there. I'm not concerned as much about perched water as I am about the potential that the water could have leeched down into the water that we're drinking. In other words, water can go there and once it's part of that resource, we have to be concerned about it.

I don't have any information that says it is. I'm wondering if part of this comprehensive study, why we didn't get anything telling us what is going on 180 feet down. That's all. My water -- is my water fairly safe? Does it got anything like PCBs in it because that

potentially was dumped at that site in 1955? We didn't know that based on the study.

MR. GOEPFERT: Well, we didn't test your well, obviously.

MR. JOHANN: No, not my well, did you test at that depth? But you're saying there was no deep water testing done as part of this -- it was just perched water to see what kind of contaminates were in the upper level of waters there.

MR. GOEPFERT: Right. Because we would not expect to see anything through a confining layer.

MR. JOHANN: Thank you.

MR. GOEPFERT: Sure. One more question?

MR. ENGSTROM: Perched water is funny stuff. It actually goes through gravel and sand layers to the -- and it can pop up miles down the road. I mean, I could tell you a story very near Camp Hero when we put a road in to move a

house back in the '70s. And on the top of the hill, one morning they go up there and it's a bubble in the road, and I drove my Toyota truck, it's up in a subdivision, behind Rusty Levy's (phonetic) ranch up there. And at the top of the hill, I drove my truck, the truck fell in a hole, it was water that popped up from miles away that actually came up to that part. We scraped enough of the ground, and the water pressure pushed the clay up and drove my truck over and went right into it.

But I mean perched water is funny stuff. It's not very easy to tell where the contaminates go from A to B. It could be over at Z, is what I'm saying. It does migrate.

MR. JOHANN: I would just like to say, to follow up on that, the in Bethpage with Drummond over a continuous period of time, and water contaminates did get into drinking water, it may be of concern there. I realize it has

nothing to do with this study, but if you live in the area, that's one of the questions that you ask yourself over a period of time, what did the military do there? Did it work? As Eric has said, it's way down over a long period of time.

I know they're not connected, but leeching poisons to make its way down into other areas is in the news. We don't know that. I have no way to know for certain if it did. But that's the question, as residents, were originally asking. What did go on there and did it affect our water? Thank you.

MR. GOEPFERT: Okay. I appreciate your comments and we will go back and look at our records and everything else that we have done and answer your concerns directly. And if there is anything further that we expect or that we would want to do, we would consider that as necessary to address your concerns.

Yes, ma'am?

MS. SHULMAN: Neri Shulman.

What does the army do with these sites when they do close them? Do they sell them?

MR. GOEPFERT: Do they what?

MS. SHULMAN: What do they do with the sites after they're closed? They sit there?

MR. GOEPFERT: Well, you know, it all depends what timeframe you're talking about. Years ago -- there's several programs that deal with base closures, okay? Bases that were closed before 1986 are addressed by the program that I work on called the Formerly Used Defense Site Program, okay? So sites that were closed after 1986 were usually part of what they call a Base Realignment Closure Program, which -- both programs do a lot of the same things with respect to testing sites and making sure that sites are safe for the environment and human health and

environment.

You're saying, what happens to these sites? Well, that all depends. Some sites get deeded over to states, some sites get sold off, there's a whole process that takes place when properties are excessed from the government.

So that's the generic answer, but that's really the only answer I have for you?

MS. SHULMAN: So it could go private?

MR. GOEPFERT: Yes. In fact, I work on a number of sites within the State of New York and New Jersey where the sites were sold off to private entities.

MR. GROHER: Are you asking if any of these sites have been set for sale to private --

MS. SHULMAN: I guess.

MR. GOEPFERT: I mean, here in the case of Camp Hero, the site was -- a part of which was transferred to the

state, a part of which was transferred to East Hampton, part of which was deeded to the Coast Guard. So here we have one site where several actions, transfer actions, take place.

Yes, ma'am?

MR. HIGGS: Margaret Higgs.

You mentioned -- maybe I misunderstood -- when the department of environmental concern, whatever, came in and took away the petroleum?

MR. GOEPFERT: They didn't take the petroleum away, the Army Corps took it away.

MS. HIGGS: So after that excavation, what happened after that? It looked like you were saying that the Department of --

MR. GOEPFERT: Environmental Conservation?

MS. HIGGS: -- Environmental Conservation was going to come back in, but I didn't get a sense they did.

MR. GOEPFERT: I mean --

MS. HIGGS: What happened after that?

MR. GOEPFERT: Well, I mean, the Corps of Engineers -- that was a spill that I assume the DoD was responsible for.

MS. HIGGS: And they felt it was contained and removed and replaced with clean top soil; is that what happened?

MR. GOEPFERT: Well, yeah. And the soils were removed and the clean material was put back in place.

But what we have now is because there was some impact to the -- to the perched groundwater in that area, okay? That perched groundwater is still in contact with the soils; so therefore, there is some residual fuels that is located within that area.

MS. HIGGS: Right. And you're saying this other department, the Department of Environmental Conservation has to come back in and look at it?

MR. GOEPFERT: No, no. They're

just looking at our report of our analysis of investigations that just took place recently over the last two years.

MS. HIGGS: So you're saying there's no concern to look any further?

MR. GOEPFERT: We don't think there is any at this point.

MS. HIGGS: Okay.

MR. GOEPFERT: If there aren't any other comments -- again, you do all have the opportunity to submit any of your comments not presented this evening in writing. That can be mailed to me by the 15th of November. And we will address all of those comments directly. And hopefully, you have put your name and address on that sign-in sheet so that we can make sure that you folks get access to the documents that we generate as part of this process.

Any other questions or concerns? Okay. Again, I thank you very much for coming --

MS. ENGSTROM: One more. Sorry.

Do we have to formally put this in writing to get a response to this?

MR. GOEPFERT: No, she's taking notes, and we will be more than happy to respond. That's why we have Sara taking notes for us.

Thank you all for coming. I appreciate it.

(Time Noted: 6:40 PM.)

C E R T I F I C A T I O N

I, SARA GALANTE, a Notary Public in and for the State of New York, do hereby certify:

THAT the within transcript is a true record of the proceedings taken on October 24th, 2019.

I further certify that I am not related either by blood or marriage, to any of the parties in this action; and

THAT I am in no way interested in the outcome of this matter.

_____

SARA GALANTE

A

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