

**EPA Superfund
Record of Decision:**

**GRIFFISS AIR FORCE BASE (11 AREAS)
EPA ID: NY4571924451
OU 30
ROME, NY
07/03/2003**

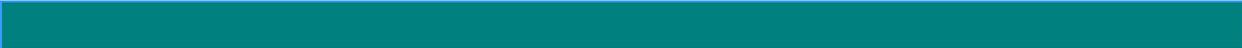
**Final Record of Decision for
Building 210 Source Removal
Area of Concern (ST-21) at the
Former Griffiss Air Force Base
Rome, New York**

March 2003

AIR FORCE REAL PROPERTY AGENCY

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List of Abbreviations and Acronyms

AFB	Air Force Base
AFRPA	Air Force Real Property Agency
AOC	Area of Concern
AST	aboveground storage tank
ATSDR	Agency for Toxic Substances and Disease Registry
BGS	below ground surface
BRAC	Base Realignment and Closure Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
DoD	Department of Defense
EPA	United States Environmental Protection Agency
FFA	Federal Facility Agreement
µg/L	micrograms per liter
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NEADS	Northeast Air Defense Sector
NPL	National Priorities List
NYANG	New York Air National Guard
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
PDI	Predesign Investigation
ROD	Record of Decision
SAC	Strategic Air Command
SARA	Superfund Amendments and Reauthorization Act
SVOC	semivolatile organic compound
STARS	Spill Technology and Remediation Series
TCLP	toxicity characteristic leaching procedure
TOC	total organic carbon
UST	underground storage tank
VOC	volatile organic compound

1.1 Site Name and Location

The Building 210 Source Removal Area of Concern (AOC) (site identification designation ST-21) is located at the former Griffiss Air Force Base (AFB) in Rome, Oneida County, New York.

1.2 Statement of Basis and Purpose

This ROD presents the no further action for soil and groundwater as the selected remedy for the Building 210 Source Removal AOC at the former Griffiss AFB. This alternative has been chosen in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA), and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The remedy has been selected by the United States Air Force (Air Force) in conjunction with the United States Environmental Protection Agency (EPA) and with the concurrence of the New York State Department of Environmental Conservation (NYSDEC) pursuant to the Federal Facility Agreement (FFA) among the parties under Section 120 of CERCLA. This decision is based on the administrative record file for this site.

1.3 Description of Selected Remedy

The selected remedy for Building 210 AOC is no further action for soil and groundwater. Residual levels of contamination in the soils do not exceed the NYSDEC

Spill Technology and Remediation Series (STARS) soil cleanup guidance values. Therefore, since residual levels of contaminants in the soil are limited in extent and do not pose a risk for continued groundwater contamination, the soil is not considered to be a current or potential threat to public health or the environment.

No volatile organic compounds (VOCs) or semivolatile organic compounds (SVOCs) exceeded the New York State (NYS) Class GA groundwater standards or NYS groundwater guidance values during the closure evaluation/investigation. No constituents were detected in the soil leachate at concentrations exceeding the STARS guidance values, indicating that there is no existing source of groundwater contamination at the Building 210 Source Removal AOC. The NYSDEC spill number 9101749 associated with this site was closed as "meeting state standards" on July 27, 2001.

1.4 Statutory Determinations

It has been determined that no remedial action is necessary at the Building 210 Source Removal AOC. The Air Force Real Property Agency (AFRPA) and EPA, with concurrence from NYSDEC, have determined that no further action for soil and groundwater is warranted for this site.

1.5 Authorizing Signatures

On the basis of the previous removal action and subsequent investigations performed at the Building 210 Source Removal AOC, there is no evidence that residual contamination at this site poses a current or future potential threat to human health or the environment. The New York State Department of Environmental Conservation has concurred with the selected remedy presented in this Record of Decision.

2.1 Site Name, Location, and Brief Description

The Building 210 Source Removal AOC (site identification designation ST-21) is located at the former Griffiss AFB in Rome, Oneida County, New York. Pursuant to Section 105 of CERCLA, Griffiss AFB was included on the National Priorities List (NPL) on July 15, 1987. On August 21, 1990, the EPA, NYSDEC, and the Air Force entered into an FFA under Section 120 of CERCLA.

Building 210, which houses the water distribution pumps for the base, is located in the west-central portion of the base (see Figure 1). A former 275-gallon steel underground storage tank (UST), which reportedly stored automotive gasoline, was located east of Building 210 (see Figure 2). In January 1984, a leak was discovered in the UST during the performance of a nearby excavation. Subsequently, in November 1984, the original UST was replaced with another 275-gallon UST (UST 210-2). In 1991, UST 210-2 and a nearby 1,000-gallon UST (UST 210-1) containing fuel oil were removed from the site.

2.2 Site History and Enforcement Activities

2.2.1 The Former Griffiss AFB Operational History

The mission of the former Griffiss AFB varied over the years. The base was activated on February 1, 1942, as Rome Air Depot, with the mission of storage, maintenance, and shipment of material for the U.S. Army Air Corps. Upon creation of the Air Force in 1947, the depot was renamed Griffiss AFB. The base became an electronics center in 1950, with the transfer of Watson Laboratory Complex (later Rome Air Development

Center [1951], Rome Laboratory, and then the Information Directorate at Rome Research Site, established with the mission of accomplishing applied research, development, and testing of electronic air-ground systems). The 49th Fighter Interceptor Squadron was also added. The Headquarters of the Ground Electronics Engineering Installations Agency was established in June 1958 to engineer and install ground communications equipment throughout the world. On July 1, 1970, the 416th Bombardment Wing of the Strategic Air Command (SAC) was activated with the mission of maintenance and implementation of both effective air refueling operations and long-range bombardment capability. Griffiss AFB was designated for realignment under the Base Realignment and Closure Act (BRAC) in 1993 and 1995, resulting in deactivation of the 416th Bombardment Wing in September 1995. The Information Directorate at Rome Research Site and the Northeast Air Defense Sector (NEADS) will continue to operate at their current locations; the New York Air National Guard (NYANG) operated the runway for the 10th Mountain Division deployments until October 1998, when they were relocated to Fort Drum; and the Defense Finance and Accounting Services has established an operating location at the former Griffiss AFB.

2.2.2 Environmental Background

As a result of the various national defense missions carried out at the former Griffiss AFB since 1942, hazardous and toxic substances were used and hazardous wastes were generated, stored, or disposed at various sites on the installation. The defense missions involved, among others, procurement, storage, maintenance, and shipping of war materiel; research and development; and aircraft operations and maintenance.

Numerous studies and investigations under the U.S. Department of Defense (DoD) Installation Restoration Program have been carried out to locate, assess, and quantify the past toxic and hazardous waste storage, disposal, and spill sites. These investigations included a records search in 1981 (Engineering Science 1981), interviews with base personnel, a field inspection, compilation of an inventory of wastes, evaluation of disposal practices, and an assessment to determine the nature and extent of site contamination; Problem Confirmation and Quantification studies (similar to what is now designated a Site Investigation) in 1982 (Weston 1982) and 1985 (Weston 1985); soil and groundwater analyses in 1986; a basewide health assessment in 1988 by the U.S. Public Health

Service, Agency for Toxic Substances and Disease Registry (ATSDR) (ATSDR 1988); base-specific hydrology investigations in 1989 and 1990 (Geotech 1991); a groundwater investigation in 1991; and site-specific investigations between 1989 and 1993. ATSDR issued a Public Health Assessment for Griffiss AFB, dated October 23, 1995 (ATSDR 1995), and an addendum, dated September 9, 1996.

In March 1992, the agencies modified the FFA in resolving a dispute concerning the Draft Final Primary Document "Identification of AOCs." Article II of the "Resolution of Disputes" identified nine sites (including the Building 210 site) to be designated as Source AOCs for the purposes of coordinating and implementing source removal actions. Pursuant to Section 300.5 of the NCP and Section 101 of CERCLA, the Air Force was required to conduct a source removal action at each of the nine sites.

An investigation, known as a Predesign Investigation (PDI), was conducted in 1993 and 1994. Results from the PDI covering the Building 210 Source Removal AOC were issued to the EPA and NYSDEC in February 1995 and can be found in the document entitled, "Final Technical Memorandum/PDI Report" (Law 1995).

2.3 Community Participation

A proposed plan for the Building 210 Source Removal AOC (AFRPA 2003), indicating no further action for soil and groundwater, was released to the public on Wednesday, February 19, 2003. The document was made available to the public in both the administrative record file located at 153 Brooks Road in the Griffiss Business and Technology Park and in the Information Repository maintained at the Jervis Public Library. The notice announcing the availability of this document was published in the *Rome Sentinel* on Tuesday, February 18, 2003. A public comment period lasting from February 19, 2003 to March 20, 2003, was set up to encourage public participation in the alternative selection process. In addition, a public meeting was held on Tuesday, March 4, 2003. The AFRPA answered questions about issues at the AOC and the proposal under consideration. A response to the comments received during this period is included in the Responsiveness Summary, which is part of this ROD (see Section 3).

2.4 Scope and Role of Site Response Action

The decision for no further action encompasses both the soil and groundwater at the Building 210 Source Removal AOC. The site does not pose an unacceptable risk to human health and the environment.

2.5 Site Characteristics

The former Griffiss AFB covered approximately 3,552 contiguous acres in the lowlands of the Mohawk River Valley in Rome, Oneida County, New York. Topography within the valley is relatively flat, with elevations on the former Griffiss AFB ranging from 435 to 595 feet above mean sea level. Three Mile Creek, Six Mile Creek (both of which drain into the New York State (NYS) Barge Canal, located to the south of the base), and several state-designated wetlands are located on the former Griffiss AFB, which is bordered by the Mohawk River on the west. Due to its high average precipitation and predominantly silty sands, the former Griffiss AFB is considered a groundwater recharge zone.

Building 210, which houses the water distribution pumps for the base, is located in the west-central portion of the base (see Figure 1). Groundwater flow in this area is in a south to southwesterly direction and the depth to groundwater ranges from 17 feet below ground surface (BGS) to 19 feet BGS. The soils are generally silty sand and gravel.

This AOC consists of a former 275-gallon steel underground storage tank (UST) and a former 1,000-gallon UST (UST 210-1) both located to the east of Building 210 (see Figure 2). The 275-gallon UST reportedly stored automotive gasoline and the 1,000-gallon UST (UST 210-1) stored fuel oil. In January 1984, a leak was discovered in the 275-gallon tank during the performance of a nearby excavation. Subsequently, in November 1984, the original UST was replaced with another 275-gallon UST (UST 210-2).

In May 1991, UST 210-2 was removed along with the 1,000-gallon UST (UST 210-1). A NYSDEC 1991 spill report (spill number 9101749) indicated that, *"During the removal of an underground storage tank at B/210, a very small amount of contaminated soil was encountered. The tank and contaminated soil were removed from the site."* In the report, No. 2 fuel oil was noted as being the contaminant of concern in the soil.

After the 1991 tank removals, an aboveground storage tank (AST) (AST 210-1) was installed in the former area of the 275-gallon UST. Subsequent investigations of the

site, which occurred following the 1984 tank replacement and the 1991 tank removals, are described below.

2.5.1 Phase II Investigation

In 1985, following replacement of the original 275-gallon UST, a Phase II investigation was performed to determine if there was any migration of contamination (see Figure 2). Seven soil borings were drilled (SB-34 through SB-40) and two monitoring wells were installed (210MW-19 and 210MW-20) in the area around Building 210. The borings and well points were clustered around the location of the USTs. Locations of the wells were limited by the building and buried utilities. While all of the locations were not strictly downgradient of the tanks, the very low change in groundwater elevation in this area would allow broad dispersion of any fuel product leaking to the water table and would be observed in nearby wells. Monitoring well MW-20 was placed less than 10 feet from the 1,000-gallon UST (UST 210-1). Soil and groundwater from the soil borings and monitoring wells were analyzed for oil and grease and total organic carbon (TOC). The results indicated that there was no visible fuel product but TOC levels in the groundwater were slightly elevated.

2.5.2 Predesign Investigation

Following the 1991 removal of the tanks and contaminated soils, a PDI was conducted in 1993 to evaluate whether all petroleum-contaminated soils surrounding the 275-gallon UST had been completely removed during previous work efforts and whether the area was a continuing source of contamination. In addition, the open spill investigation (NYSDEC spill number 9101749) was still associated with this AOC. An area of possible subsurface soil contamination was identified in the vicinity of the former 275-gallon UST prior to sampling. Three soil borings (210SB-1, 210SB-2, and 210SB-3) were drilled in this area and one of the borings (210SB-1) was subsequently converted to monitoring well 210MW-1. The soil borings were advanced to depths of 20 to 24 feet BGS. Soil samples were collected at 2-foot depth intervals in each boring. Based on the results of soil headspace screening, two soil samples from each borehole were then selected for chemical analysis; the sample with the highest headspace reading from the vadose zone and the sample from the groundwater interface. If organic compounds were

not detected during headspace screening, the interval from 0 to 2 feet and the groundwater interface were sampled and analyzed.

2.5.2.1 Soil Leachate Results

Soil samples were analyzed for VOCs, SVOCs, and lead using the toxicity characteristic leaching procedure (TCLP) extraction process. A comparison of the analytical results to regulatory standards and guidance values is provided in Section 2.7. Two VOCs, toluene and tetrachloroethylene, were detected at low levels (0.48 µg/L and 0.30 µg/L, respectively, which were below groundwater standards and guidance values) in the TCLP leachate from deep soil sample 210SB-1F (8 to 10 feet BGS). No other VOCs were detected. In addition, SVOCs were not detected in the leachate from any of the soil samples.

2.5.2.2 Groundwater Results

One permanent groundwater monitoring well (210MW-1) was installed and sampled in November 1993. The groundwater sample was analyzed for VOCs, SVOCs, and lead. Nine VOCs (p-isopropyltoluene; isopropylbenzene; 1,2,4-trimethylbenzene; 1,2,5-trimethylbenzene; n-propylbenzene; n-butylbenzene; sec-butylbenzene; tetrachloroethylene; naphthalene) and lead were detected in the groundwater samples; seven VOCs and lead exceeded the NYS groundwater standard. Due to the high turbidity of the groundwater sample and an error in the laboratory extraction method for SVOCs, the SVOC data was rejected. The well was redeveloped and sampled again in April 1994 for SVOC analysis. Two SVOCs, fluoranthene and fluorene, were detected at low estimated concentrations (0.0057 µg/L and 0.0045 µg/L, respectively) below the NYS guidance values.

Soil boring 210SB-3 was advanced as a temporary groundwater observation well when installed in 1993 to determine whether free product was present in the surficial aquifer at this site. No free product was detected.

2.5.3 Building 210 Further Investigation and Results

In 1995, as a result of the findings of the PDI, additional soil testing was performed at the Building 210 Source Removal AOC. Two soil borings (210SB1 and 210SB2) were installed to depths of 18.6 and 18.0 feet BGS, respectively, in the vicinity

of the tank area. Soil samples were collected from these borings at 2-foot intervals and screened for VOCs. For each boring, a soil sample from the depth interval with the highest headspace reading from the vadose zone was submitted for TCLP VOC and SVOC analysis. Low levels (below standards and guidance values) of 1,2,4-trimethylbenzene; hexa-chloro-butadiene; naphthalene; toluene; and m,p-xylene were detected in the soil samples at estimated concentrations ranging from 0.6 µg/L to 2.3 µg/L.

2.5.4 Closure Evaluation/Investigation

An evaluation/investigation was performed in May 2000 to determine the extent of soil and groundwater contamination at the site. Actual soil sampling was not necessary due to the great amount of soil data available from previous investigations. Previous soil data was evaluated for closure purposes. Six groundwater samples were collected (TW1, TW2, TW3, 210MW-1, 19 and 20) and one piezometer was installed at the site (see Figure 2). The groundwater samples were analyzed for VOCs, SVOCs, and total dissolved lead. One SVOC (dibenz[a,h]anthracene at 0.7 µg/L) and lead (5 µg/L) were the only chemicals detected in the groundwater (well 210MW-19).

2.6 Current and Potential Future Site Use

The current and future land use designations for the Building 210 AOC are commercial/industrial. However, a land use restriction is not required for this site under the selected alternative of no further action.

2.7 Comparison of Analytical Results and Regulatory Standards

2.7.1 Soil Leachate Comparison

Soil analytical results obtained during the PDI and 1995 investigations were compared to cleanup values published in the NYSDEC STARS Memo No. 1 as applicable. This document, which sets forth the criteria for addressing these types of constituents, states that constituent concentrations in soil should not exceed levels where soil leachate might exceed groundwater standards. For fuel- or gasoline-contaminated soil, the policy further states that if the concentrations of volatile hydrocarbons and semivolatile hydro-

carbons in the leachate do not exceed the NYS groundwater standards or guidance values, the soil is not considered to impact groundwater quality.

The concentrations of all VOCs and SVOCs detected in the soil leachate were below the NYS groundwater standards and guidance values as published in STARS Memo No. 1 as TCLP extraction guidance values. In addition, the leachate concentrations derived from the soil analytical results in the 1999 study were below the TCLP alternative guidance values published in STARS Memo No. 1. As such, the soil at the Building 210 AOC does not pose a risk for continued groundwater contamination.

2.7.2 Groundwater Comparison

The NYS Class GA Groundwater Standards were used to assess groundwater quality. Class GA waters are defined as fresh groundwater found in the saturated zone of unconsolidated deposits, consolidated rock, and bedrock. The best use of Class GA waters is as a source of potable water

In 1993, during the PDI, seven VOCs detected in the groundwater (p-isopropyltoluene [21 µg/L]; isopropylbenzene [8 µg/L]; 1,2,4-trimethylbenzene [390 µg/L]; 1,3,5-trimethylbenzene [200 µg/L]; n-propylbenzene [41 µg/L]; n-butylbenzene [41 µg/L] and sec-butylbenzene [6 µg/L]) exceeded the NYS groundwater standard of 5 µg/L. None of these VOCs were detected in the TCLP soil leachate. Lead, with a concentration of 55 µg/L, exceeded the NYS groundwater standard of 25 µg/L. The concentrations of all detected SVOCs were below the NYS guidance values.

In May 2000, during the closure evaluation/investigation, no contamination exceeding state standards and guidance values was identified in groundwater or the previously collected soil samples and the site was recommended for site closure. The concentrations of dibenz[a,h]anthracene and lead in the groundwater were below the NYS groundwater standards of 50 µg/L and 25 µg/L, respectively. The NYSDEC spill number 9101749 was closed as “meeting state standards” on July 27, 2001.

2.8 Documentation of Significant Changes

No significant changes have been made to the selected remedy from the time the proposed plan was released for public comment.

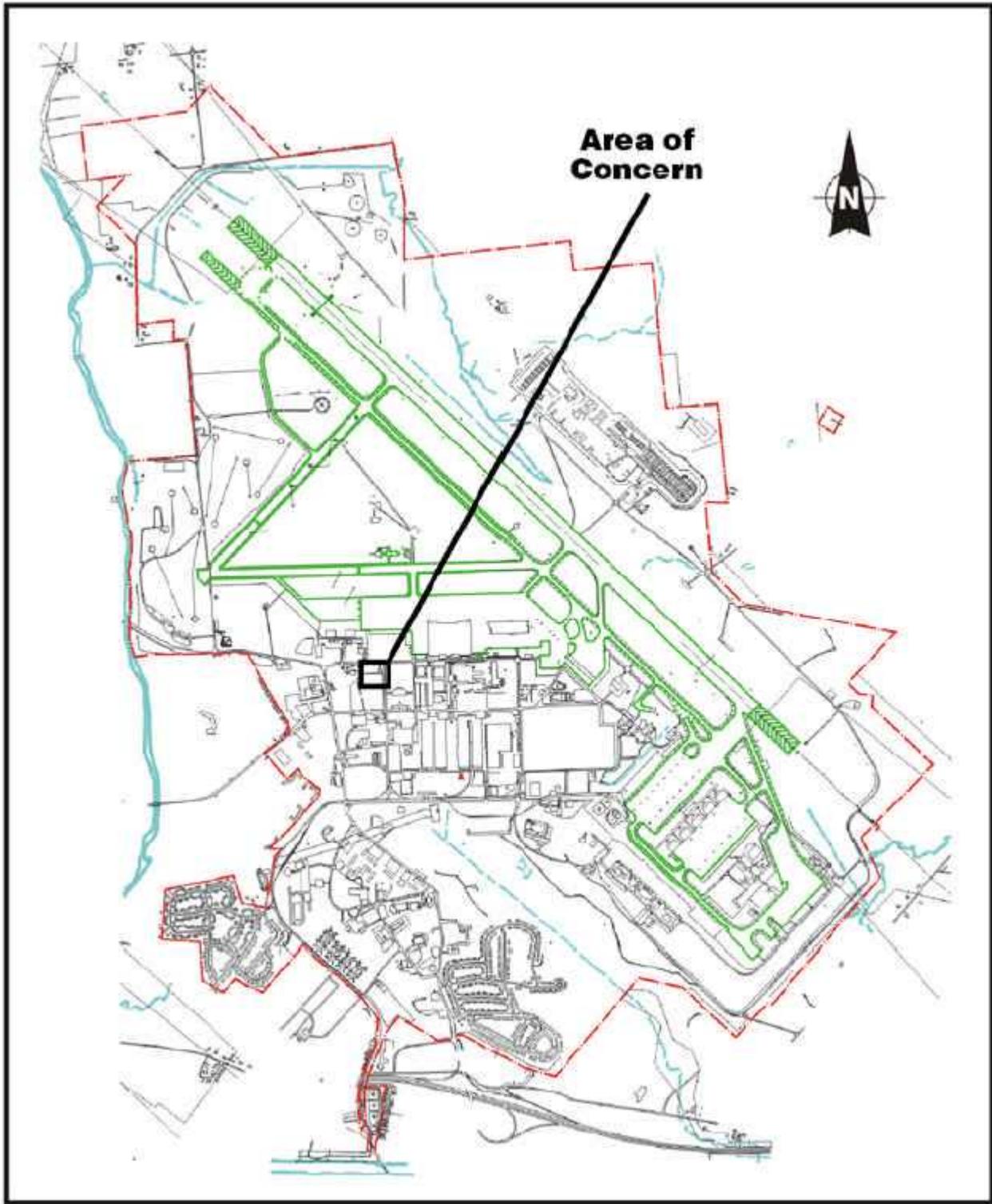


Figure 1 Location of Building 210 AOC

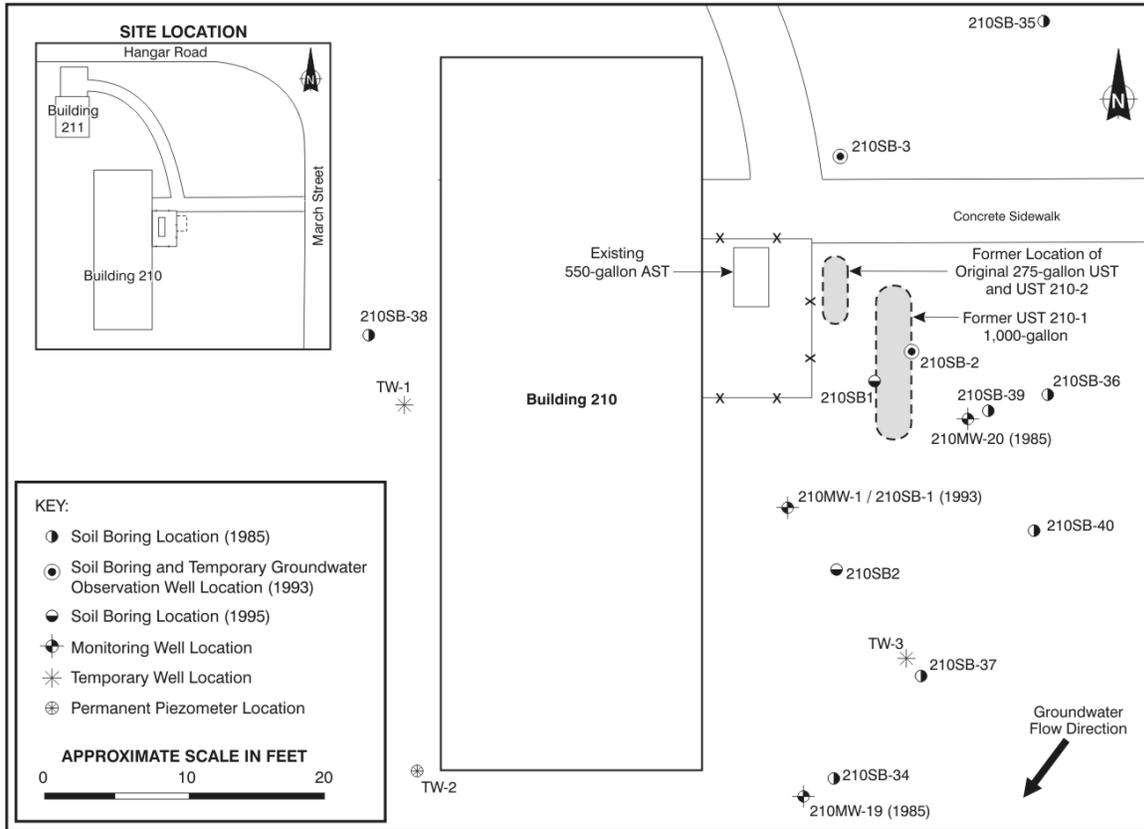


Figure 2 Building 210 AOC Source Removal Area

On Tuesday, February 19, 2003, AFRPA, following consultation with and concurrence of the EPA and NYSDEC, released for public comment the proposed plan for no further action for soil and groundwater at the Building 210 Source Removal AOC at the former Griffiss AFB. The release of the proposed plan initiated the public comment period, which concluded on March 20, 2003.

During the public comment period, a public meeting was held on Tuesday, March 4, 2003, at 5:00 p.m. at the Air Force Real Property Agency conference room located at 153 Brooks Road, Rome, New York. A court reporter recorded the proceedings of the public meeting. Copies of the transcript and attendance list are included in the Administrative Record. The public comment period and the public meeting were intended to elicit public comment on the proposal for no further action at the site.

This document summarizes and provides responses to the oral comments received at the public meeting. No written comments were received during the public comment period.

ORAL COMMENTS

Following the public meeting presentation, Mr. Nelson Robinson asked one question about the Building 210 AOC and other general questions about the entire CERCLA process. These questions were answered and he was placed on the mailing list for notices of Restoration Advisory Board meetings and other information.

Building 210 Comment

Comment #1 (Mr. Nelson Robinson)

When you talk about deciding what standards to use, I've heard NYS talk about different levels of cleanup for what's going to be put there, so which standards are you using?

Response #1

The NYS standards and guidance values used for this site apply to unrestricted use, which would include residential use. The contaminant levels in the soil and groundwater all fall below the applicable standard and guidance values. The remedy for the Building 210 site is no further action, with no restrictions being placed on land use.

General Comments

Comment #2 (Mr. Nelson Robinson)

I guess this land will eventually be turned over to the City of Rome?

Response #2

Most of the property is being transferred to the Oneida County Industrial Development Agency and then transferred to the Griffiss Local Development Corporation.

Comment #3 (Mr. Nelson Robinson)

Is there going to be a briefing for the whole base instead of just one building at the very end?

Response #3

The status of the environmental program for the entire base is reviewed at the Restoration Advisory Board meetings. The meetings are held twice per year.

Comment #4 (Mr. Nelson Robinson)

How close are we to being done?

Response #4

The target date to have all remedies in place is 2005. After that date, there will be treatment systems or monitoring systems operating. For all sites with active remedies, we have to prove to EPA that the sites are operating properly and suc-

cessfully. It is anticipated that monitoring may be performed for 30 years for some sites.

Comment #5 (Mr. Nelson Robinson)

Who sets the goals for the piece of property when they clean it up for residential use or industrial use?

Response #5

The community selected potential land use goals for the sites and presented them in their Master Reuse Plan. Based on the land uses, the Air Force prepared an Environmental Impact Statement and a Property Disposal Record of Decision.

Comment #6 (Mr. Nelson Robinson)

The people I work with thought that the city would end up with all this property so they were concerned.

Response #6

The City does not end up with the property. The property is turned over to the Oneida County Industrial Development Agency and then transferred to the Griffiss Local Development Corporation, which sells the property to private entities. Each parcel of property goes through an environmental evaluation before it is deeded.

Comment #7 (Mr. Nelson Robinson)

When you do sampling, do you leave pipes in the ground so you can get more samples in other years?

Response #7

In many cases we have left permanent monitoring wells in place. Once a site is closed and no more data is needed, the wells may be removed. For the landfills, the wells will be in place for at least thirty years to monitor the groundwater.

- Agency for Toxic Substances and Diseases Registry (ATSDR), 1995, *Public Health Assessment for Griffiss Air Force Base, Rome, Oneida County, New York*, CERCLIS NY4571924451, prepared for U.S. Department of Health and Human Services, Public Health Service, Albany, New York.
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