

**Environmental  
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Management**

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12 April 2017  
ERM Reference No. 0097881

Mr. Kevin Willis  
Remedial Project Manager – Fulton Avenue Superfund Site  
New York Remediation Branch  
United States Environmental Protection Agency, Region II  
290 Broadway, 20<sup>th</sup> Floor  
New York, NY 10007-1866

Re: First Quarter 2017 Progress Report  
150 Fulton Avenue NPL Site - Operable Unit I  
USEPA Consent Judgment No. CV-09-3917  
DOJ Ref. No. 90-11-2-09329  
Garden City Park Industrial Site NYSDEC#130073

Dear Mr. Willis:

On behalf of Genesco Inc. (Respondent), this letter transmits the First Quarter 2017 (January-March) Progress Report for the Fulton Avenue Superfund Site (Site).

**OPERABLE UNIT 1 REMEDIAL DESIGN & INTERIM REMEDIAL ACTION**

During the reporting period, remedial design (RD) and remedial action (RA) activities continued as specified in the U.S. Environmental Protection Agency's (EPA) 30 September 2015 Amendment to the interim remedial action selected in the EPA's 28 September 2007 Operable Unit One (OU1) Record of Decision (ROD) for the Site.

**OU1 Remedial Design Work Plan**

As noted in the 10 January 2017 Fourth Quarter 2016 Progress Report, the Respondent prepared and submitted to EPA on 14 October 2016 the OU1 RD Work Plan in accordance with the requirements of the revised August 2016 OU1 Consent Judgment (CJ) and revised OU1 Statement of Work (SOW) filed by the Court on 15 August 2016.

The OU1 RD Work Plan sets forth the objectives, performance standards, scopes of work, required deliverables and schedules for the OU1 RD activities, and subsequent implementation of the OU1 RA.

While the OU1 RD Work Plan was under review by EPA, the Respondent moved forward with planning/access acquisition activities for the OU1 remedial construction tasks detailed therein which include among other things, installation of two additional groundwater wells, i.e., MWs 21D & 28A-H to expand the existing groundwater monitoring well network and facilitate required OU1 plume monitoring. These activities included planning/access/coordination and meetings with the Garden City Country Club (GCCC) management, staff of the Village of Garden City (VGC) Department of Public Works (DPW), and the drilling subcontractor. Details thereof were provided in ERM's letters of 1 November, 13 December, 16 December and the 10 January 2017 Quarterly Progress Report to EPA.

EPA provided initial feedback on the 2016 OU1 RD Work Plan indicating that no groundwater sampling or well installation tasks should be performed until a revised version of the previously EPA-approved Quality Assurance Project Plan (QAPP)<sup>1</sup> and additional groundwater monitoring well design details were submitted to EPA for review and approval.

A revised and conformed QAPP for the Site was prepared and submitted to EPA on 5 January 2017 for review and approval. On 20 March, EPA issued written comments regarding the revised QAPP. The document is being revised and will be submitted to EPA on or before 21 April for final approval.

A Supplemental Groundwater Monitoring Well Specification Package was prepared and submitted to EPA on 13 January 2017 for review and approval. On 25 January 2017, EPA approved the Supplemental Well Design Package authorizing the Respondent to proceed with the well installation activities.

### *Remedial Construction Activities*

Deep multi-level groundwater monitoring well MW28A-H was planned to be installed first, during the winter months when the golf course is closed or minimally used to minimize any impact the well installation activities might have to the GCCC golf course operations/member use.

On 13 February 2017, field mobilization activities commenced with both public utility (Call 811) and private geophysical subcontractors performing subsurface clearance for the locations of well MW28A-H and the adjacent reverse-rotary drilling method water/cuttings pit at the work site which is located on the south side of the GCCC golf course. The drilling subcontractor subsequently mobilized and constructed the work site.

Drilling commenced on 28 February and continued until 6 March when the top of the Raritan Fire Clay (bottom of the Magothy Aquifer) was encountered at 495 feet below grade. Geophysical logging of the borehole was performed on 7 March and the well design (selection of 8 screened intervals) was completed in consultation with EPA using the geophysical and driller's logs from the borehole. The well construction was completed on 11 March. Development of each screen zone immediately commenced thereafter and was completed by 17 March when the well was left with an isolation packer string in the well to prevent cross-flow between screen zones. The driller subsequently demobilized and restored the work site which was completed with installation of a well vault and protective manhole on 31 March. The Waterloo multi-level well system installation is scheduled for 24-26 April.

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<sup>1</sup> The October 2016 OU1 RD Work Plan originally anticipated revision and submittal of the QAPP as part of the overall Site Management Plan package for the Site after installation of the new groundwater monitoring wells.

### UPCOMING 2<sup>ND</sup> QUARTER 2017 ACTIVITIES

Concurrent with the upcoming submittal and approval of the QAPP, it is anticipated that EPA will approve the OU1 RD Work Plan. The final OU1 RD Work Plan document will include updated RD and RA schedules presented therein as Figures 3 & 4, respectively.

In addition to continuation of the Field Construction Activities, EPA's approval of the OU1 RD Work Plan will trigger commencement of the other 2016 SOW RD tasks that will continue throughout 2017. These activities include and further are summarized below:

- Field Construction Activities
- Groundwater Monitoring
- Key OU1 RA Plans
- Evaluation Reports

#### Field Construction Activities: Groundwater Monitoring Well Installations & Maintenance

The monitoring well network designated in the 2016 SOW to facilitate OU1 plume monitoring will be inspected, repaired and expanded with the continued installation of two additional groundwater wells.

- All existing wells to be used for long-term groundwater monitoring will be inspected and repaired as necessary to ensure continued integrity and function for groundwater level and quality monitoring use.
- The Waterloo multi-level well system is scheduled to be installed in newly constructed MW28A-H on 24-26 April.
- One additional deep groundwater monitoring well (MW21D) shall be added to the existing MW21A-C well cluster located approximately 1,200 feet directly upgradient of VGC water supply wells 13 and 14. Current residential home construction immediately adjacent to the intended well location may necessitate a minor location adjustment to prevent delays. EPA will be informed of any adjustments and the upcoming drilling schedule under separate cover.

#### Groundwater Monitoring

In accordance with Attachment 1 of the 2016 SOW (Monitoring Well Sampling Program), the first sampling round for Group 1, consisting of 18 individual wells shall commence within 20 days of EPA approval of the OU1 RD Work Plan, and long-term groundwater monitoring will continue in accordance with additional groups/schedules established therein. These activities will include sample collection, laboratory analysis, data validation, data evaluation/reporting, and disposal of the investigative derived waste (monitoring well purge water).

#### Key OU1 RA Plans

Preparation and submittal to EPA the following RA plans:

- **Site Management Plan (SMP)** with appended key supporting plans for long-term operations, maintenance, monitoring & reporting (OM&M) for the Site.

- **Green Remediation Plan (GRP)** that considers and specifies how the OU1 RA can be implemented using the principles in EPA Region 2's Clean and Green Policy.

### Evaluation Reports

Preparation and submittal to EPA the following evaluation reports:

- **VGC Public Supply Well Nos. 13 & 14 Air Stripper Treatment Systems Evaluation/Report** to confirm that the existing air stripper treatment systems for VGC water supply wells 13 and 14 are protective of human health or determine if replacing components of, or repairing or upgrading the existing treatment systems for VGC water supply wells 13 and 14 is necessary to ensure the protectiveness of human health.
- **Vapor Phase Evaluation Report** to evaluate whether a vapor-phase carbon unit is needed to capture and treat volatile organic compounds (VOCs) discharged from the air stripper treatment units on VGC water supply wells 13 and 14 in order to comply with NYSDEC's Air Toxics Program (6 NYCRR Part 212) and the Guidelines for the Control of Toxic Ambient Air Contaminants (DAR-1).

### VGC WATER SUPPLY WELL MONITORING

The VGC continued OM&M, and protection of VGC water supply wells 13 and 14. The Respondent and USEPA recently received a new set of sampling/pumpage records for VGC water supply wells 9, 13 and 14 through March 2017.

The new data were incorporated into the existing database set, and used to update corresponding charts for the Well Nos. 13 & 14 showing tetrachloroethene (PCE) and trichloroethene (TCE) concentrations versus time, and historic monthly pumpage versus time to evaluate recent contaminant concentration trends depicted in the same. The updated charts for Well Nos. 13 & 14 are presented as Figures 1 & 2, respectively.

Average concentrations of PCE and TCE (and the corresponding PCE/TCE ratio) are summarized for each of the three wells by year (2001 - 2016) in Table 1. Simple charts that plot average annual PCE and TCE concentrations versus time for each of the three wells are also embedded in Table 1 for comparative viewing.

The data and resultant plots indicate that since 2007, both maximum observed and annual average concentrations of PCE have been declining in Well Nos. 13 & 14. Concentrations of TCE have been declining in Well No. 13, and are beginning to decline in Well No. 14. A brief summary that puts the relative concentrations in perspective is presented in the table below.

VGC Well	Dominant Compound Historic High	2007 Average	2016 Average	Difference of Averages	% Change of Averages
<b>No. 13 (N-07058)</b>	<b>6/4/2007</b>				
PCE	1020	722.6	357.0	-365.6	-51%
TCE	91.5	90.0	48.3	-41.7	-46%
<b>No. 14 (N-08339)</b>	<b>10/27/2007</b>				
PCE	769	370.1	213.6	-156.5	-42%
TCE	69	38.9	27.1	-11.8	-30%

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

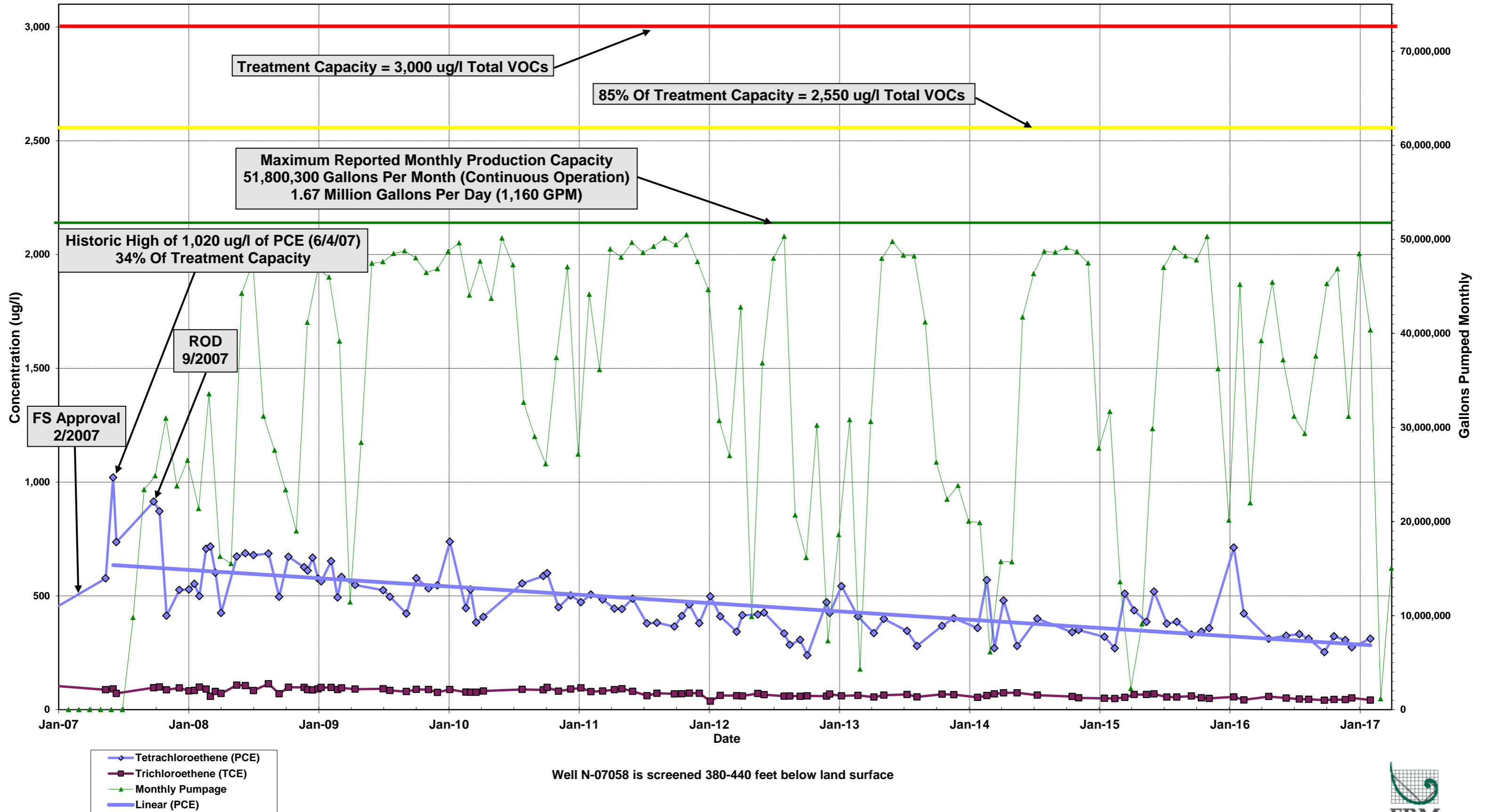
Sincerely,



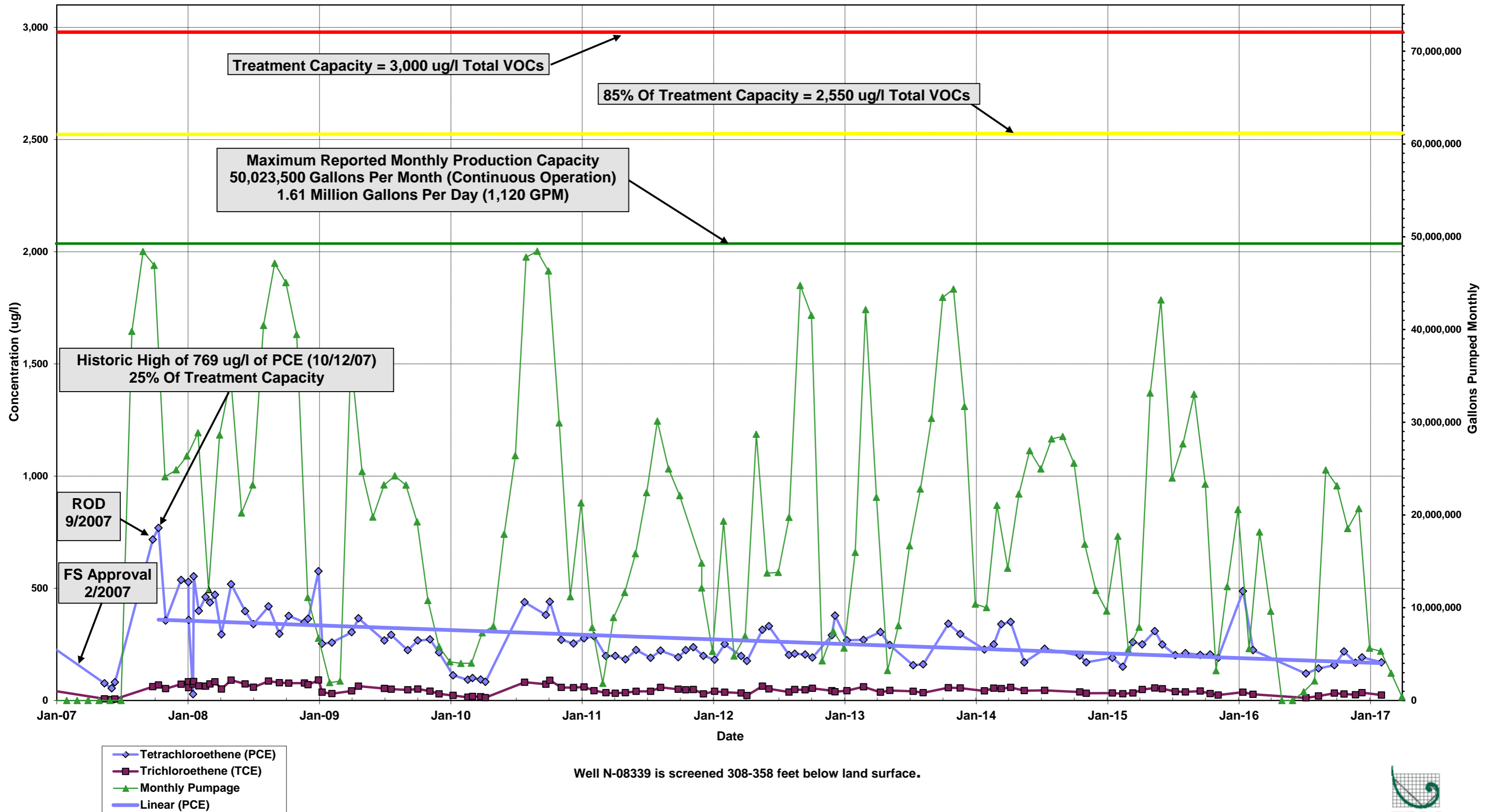
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**FIGURE 1**  
**HISTORICAL TETRACHLOROETHENE & TRICHLOROETHENE CONCENTRATIONS AND MONTHLY WELL PUMPAGE: JANUARY 2007 - MARCH 2017**  
**PUBLIC WATER SUPPLY WELL # N-07058 (GARDEN CITY WELL NO. 13), GARDEN CITY, NEW YORK**



**FIGURE 2**  
**HISTORICAL TETRACHLOROETHENE & TRICHLOROETHENE CONCENTRATIONS AND MONTHLY WELL PUMPAGE: JANUARY 2007 - MARCH 2017**  
**PUBLIC WATER SUPPLY WELL # N-08339 (GARDEN CITY WELL NO. 14), GARDEN CITY, NEW YORK**



**TABLE 1**  
**HISTORIC AVERAGE TETRACHLOROETHENE AND TRICHLOROETHENE CONCENTRATIONS BY YEAR 2001 - 2016**  
**GARDEN CITY PUBLIC WATER SUPPLY WELL NOS. 9, 13 14, GARDEN CITY, NEW YORK**



Well No.	Year	2001		2002		2003		2004		2005		2006		2007		2008		2009		2010		2011		2012		2013		2014		2015		2016	
		Compound	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	
Well No. 13 (N-07058)	Average Concentration	128.0	57.8	211.8	67.0	271.7	59.0	263.6	65.3	335.0	73.9	488.3	85.8	722.6	90.0	603.4	88.5	539.5	90.3	508.3	86.1	454.3	80.2	345.4	59.7	385.5	62.5	381.1	63.4	385.1	57.1	357.0	48.3
	Ratio PCE/TCE	2.2		3.2		4.6		4.0		4.5		5.7		8.0		6.8		6.0		5.9		5.7		5.8		6.2		6.0		6.7		7.4	
Well No. 14 (N-08339)	Average Concentration	152.0	83.6	168.7	68.2	243.3	76.2	168.6	46.9	264.2	58.6	385.0	66.5	370.1	38.9	412.4	75.0	278.1	46.3	241.2	46.2	222.8	41.7	244.1	43.1	255.8	46.6	242.1	45.9	219.9	38.8	213.6	27.1
	Ratio PCE/TCE	1.8		2.5		3.2		3.6		4.5		5.8		9.5		5.5		6.0		5.2		5.3		5.7		5.5		5.3		5.7		7.9	
Well No. 9 (N-03881)	Average Concentration	2.1	7.0	6.6	37.5	7.9	44.0	11.6	76.0	13.7	92.0	21.0	93.0	31.6	109.0	32.0	94.8	36.4	97.5	33.9	84.6	42.0	90.0	35.7	78.1	39.5	80.2	40.1	79.6	40.9	80.4	41.8	79.8
	Ratio PCE/TCE	0.3		0.2		0.2		0.2		0.1		0.2		0.3		0.3		0.4		0.4		0.5		0.5		0.5		0.5		0.5		0.5	

