Environmental Resources Management

105 Maxess Road
Suite 316
Melville, NY 11747
(631) 756-8900
(http://www.erm.com)

17 April 2018
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, 20th Floor
New York, NY 10007-1866

Re: First Quarter 2018 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. (Settling Defendant), this letter transmits the First Quarter 2018 (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. The OU1 RD and RA activities (the Work) are being implemented in accordance with the revised OU1 Consent Judgment (2016 CJ) and revised OU1 Statement of Work (2016 SOW) approved by the Court on 15 August 2016, and the EPA-approved OU1 RD Work Plan, final version dated 16 August 2017.

During 2016-2017, new groundwater monitoring wells were installed, guiding documents were prepared and/or updated and approved by EPA, required evaluations were completed and resultant deliverables submitted to EPA, and thus, remaining significant OU1 RA activities for which the Settling Defendant is responsible are long-term groundwater monitoring and reporting, and maintenance of the associated groundwater monitoring wells and the sub-slab depressurization/venting system (SSDS) at the 150 Fulton Avenue property. The Incorporated Village of Garden City (VGC) operates public supply wells 13 & 14 and the associated air stripper treatment systems, which are not under the Settling Defendant's control.

Key OU1 Plans & Evaluation Reports

As noted in the 4th Quarter 2017 Progress Report, the **OU1 Site Management Plan (OU1 SMP)** and **OU1 Remedial Design (OU1 RD Report)** were submitted to USEPA on 18 December 2017 and 8 January 2018, respectively.

- The **OU1 SMP** is the central, comprehensive guiding document that sets forth the objectives, performance standards, guidelines and scopes of work for implementation of the OU1 RA. Appended to the SMP are the following key supporting plans for long-term operations, maintenance, monitoring & reporting (OM & M) for the Site:
  - Groundwater Monitoring Plan;
  - Quality Assurance Project Plan (QAPP);
  - Health and Safety Contingency Plan;
  - Contractor Procurement Plan;
  - Operations, Maintenance & Monitoring (OM & M) Plan;
  - Institutional/Engineering Control Certifications Plan;
  - Green Remediation Plan (GRP); and
  - Revised RA Schedule.

- The **OU1 RD Report** documents in detail the remedial design and construction activities undertaken during 2016-2017, and presents supporting information and/or previously submitted documents:
  - Appendix A - OU1 SMP - (18 Dec 2017)
  - Appendix B - VGC Public Supply Well Nos. 13&14 Air Stripper Treatment Systems Evaluation/Report - (15 Sept 2017)
  - Appendix C - Air Stripper Vapor Phase Evaluation Report (15 September 2017)
  - Appendix D - Well Installations Photo Log
  - Appendix E - Geophysical, Well Construction & Well Development Logs
  - Appendix F - Solinst, Inc. Waterloo Multi-Level Groundwater Monitoring System Specifications

Groundwater Monitoring

Groundwater monitoring continued in accordance with Attachment 1 of the 2016 SOW: Monitoring Well Sampling Program (see attached Table 1) and the OU1 RA Schedule (Figure 3 of the OU1 SMP). Key events for the reporting period included:

- Validated results of the December 2017 groundwater sample laboratory data deliverables were submitted to EPA in a data transmittal with cover letter on 16 February 2018; and
- 28 groundwater samples were collected from Groups 2 & 3 wells (plus quality assurance/quality control (QA/QC) samples) during the week of 5 March 2018.

The March 2018 groundwater sampling event included the collection of 28 samples from Groups 2 & 3 wells that following monitoring wells:

- MWs 21A-D;
- MW-27 (intervals A – H);
- MW-26 (intervals A – H); and
- MW-28 (intervals A – H).

The Work was performed in accordance with the EPA-approved QAPP for the Site. The conventional monitoring wells were purged and sampled using bladder pumps.

Multi-level groundwater monitoring wells were purged and sampled in accordance with the manufacturer's instructions using nitrogen as a drive gas. Field parameters (pH, specific conductance, turbidity, dissolved oxygen, temperature and oxidation-reduction potential) were monitored from the pump discharge into a flow-through cell to ensure stabilization of parameters prior to conclusion of the purging and collection of groundwater sample.

All groundwater and QA/QC samples were analyzed for volatile organic compounds (VOCs) using USEPA Method 8260C by SGS Accutest Laboratories of Dayton, New Jersey (SGS Accutest). SGS Accutest is a New York State Department of Health (NYSDOH) Environmental Laboratory Accreditation Program (ELAP)-certified laboratory (Certification ID 10983) and certified to perform the analytical methods used for this sampling event.

Analytical laboratory data deliverables for March groundwater monitoring event are being validated by a third-party data validation contractor (Environmental Data Services, Inc.). Validated results of the March 2018 groundwater sample laboratory data deliverables will be submitted to EPA on or before 4 May 2018.

The IDW generated from the March groundwater sampling event (monitoring well purge water) is temporarily stored in the secure staging area at the 150 Fulton Avenue property. Innovative Waste Recycling Technologies is coordinating disposal of the purge water as a F002 hazardous waste at a properly permitted facility (Republic Environmental Systems in Hatsfield, PA) in accordance with all Federal, state and local regulations.

Remedial Construction Activities

With the exception of the new wells installed during 2017 (MW-21D & MW28A-H), all other existing wells designated in the 2016 SOW to facilitate long-term OU1 groundwater monitoring are greater than 10 years old, and periodic inspections are necessary to ensure continued integrity and function for long-term groundwater level/quality monitoring. During the reporting period, inspections were performed and maintenance, e.g., well top repairs and/or redevelopment by the drilling subcontractor will subsequently be undertaken, as needed, during warm weather that is conducive to proper curing of cement used to secure the well top roadway boxes in place.

150 Fulton Avenue Sub-Slab Depressurization System

During 10 – 11 January 2018, the SSDS currently operating at the 150 Fulton Avenue property was modified in accordance with the EPA-approved September 2017 Sub Slab Depressurization System Modification Work Plan. The work was completed in response to EPA's request to upgrade the system by the addition of a continuously operating, electrically-powered fan. A photo log of the SSDS modifications is presented in Attachment 1.

A vacuum gauge, sampling port and an airflow measurement port were also installed on the above-grade piping adjacent to the stack. The wind-turbine was left on the top of the 35-foot stack so that should the fan motor fail, the temporary backup operating condition would be as it has been for the last 15 years until the fan could be replaced.

A post-installation inspection indicated:

- All piping and electrical connections are tight and leak-free;
- The electrical conduit, fan, and all piping are secure and vibration-free; and
- The asphalt saw-cut was repaired.

The vacuum and flow measurements taken at the location of the fan were 89 cubic feet per minute (cfm) with 1.45 inches water column ("WC) applied vacuum which is consistent with the manufacturer's typical air flow and static pressure specifications.

Pressure measurements were collected from the seven (7) vapor monitoring points previously installed by EPA within the building to confirm measurable negative pressure beneath the building footprint. Those data ranged 0.006"– 0.044" water column (WC) which exceed 0.002" W.C. which is considered a minimum sub-slab pressure to mitigate soil vapor intrusion[1]. Figure 1 shows the configuration of the SSDS system, locations of the vapor monitoring points, and corresponding vacuum measurements that have been contoured using 0.01" WC isobars.

VGC Water Supply Well Monitoring

The VGC continued OM & M, and protection (treatment) of VGC water supply wells 13 and 14. In January 2018, the Settling Defendant and USEPA received a new set of sampling and pumpage records for VGC water supply wells 9, 13 and 14 through December 2017.

The new data were incorporated into the existing database set, and used to update charts and tables presented in the 22 January 2018 Fourth Quarter Progress Report including:

- Charts for VGC wells 13 and 14 showing PCE and TCE concentrations versus time, and historic monthly pumpage versus time to evaluate recent contaminant concentration trends depicted in the same.
- Tables and charts of average concentrations of PCE and TCE (and the corresponding PCE/TCE ratio) for each of the three wells by year (2001 – 2017).

A new set of sampling and pumpage records for VGC water supply wells 9, 13 and 14 through June 2018 will be obtained and the updated charts and tables will be presented in the 2nd Quarter 2018 Progress Report.

UPCOMING 2nd QUARTER 2018 ACTIVITIES

Field Construction Activities: Groundwater Monitoring Well Maintenance

Groundwater monitoring well inspections will be performed and an EPA Region 2 Superfund Well Assessment Checklist will be completed for each well. Road opening permits will be obtained from the VGC and maintenance, e.g., well top repairs competed by a qualified drilling subcontractor.

[1] USEPA. Radon Prevention in the Design and Construction of Schools and Other Large Buildings. June 1994.

Groundwater Monitoring

Long-term groundwater monitoring will continue in accordance with groups/schedules established in the 2016 SOW (Table 1) and indicated in the OU1 RA Schedule (Figure 3 of the SMP) the:

- Validated results of the March 2018 groundwater sample laboratory data deliverables will be submitted to EPA in a data transmittal under separate cover on or before 4 May 2018; and
- Next long-term groundwater sampling event will consist of sampling the Groups 2 & 3 wells (MWs 26A-H, 27A-H, 28A-H and 21A-D) and is scheduled for the week of 4 June 2018.

Investigative Derived Waste

The IDW generated from the June groundwater sampling event (monitoring well purge water) will be temporarily stored in the secure staging area at the 150 Fulton Avenue property. The wastes will be managed, characterized and properly disposed of at a permitted facility in accordance with all Federal, state and local regulations.

150 Fulton Avenue Sub-Slab Depressurization System

The EPA 27 November 2017 conditional approval letter of the Sub Slab Depressurization System Modification Work Plan sought a semi-annual sub-slab soil vapor/IAQ sampling and reporting program to be undertaken for a minimum of two years (four events) after which time EPA will decide if further work should be done.

On 1 December 2017, the Settling Defendant offered an alternate scope to include a sub-slab soil vapor/indoor air sampling event such that the post-installation steps will be:

- Check the SSDS monthly to verify that the fan is operating. Any electrical faults or fan failures will be corrected by a NY State-licensed electrical contractor. Any needed access will be coordinated with the Fulton Property owner and building tenant.
- Performance of one (1) sub-slab soil vapor/IAQ sampling event at the EPA vapor monitoring point locations approximately six months after the fan installation (June 2018);
- Submittal of a letter report documenting the fan installation, vacuum measurements and sub-slab soil vapor/IAQ sampling results; and
- Based on those results, a potential scope and frequency of future monitoring would then be considered and discussed with EPA to establish an appropriate monitoring/reporting program.

VGC Water Supply Well Monitoring

A new set of sampling and pumpage records for VGC water supply wells 9, 13 and 14 through June 2018 will be obtained and the updated charts and tables will be presented in the 2nd Quarter 2018 Progress Report.

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,

Chris W. Wenczel
Principal Consultant
Attachments

cc: Andrea Leshak, Esq., USEPA
Robert Kambic, USDOJ
Steven M. Scharf, P.E., NYSDEC
John Swartwout, NYSDEC
Paul Alexis, Esq., Bradley
Thor Urness, Esq., Bradley
Melissa Ballengee Alexander, Esq., Bradley
James Periconi, Esq., Periconi, LLC
Roger Sisson, Esq., Genesco Inc.
James Perazzo, ERM Consulting & Engineering, Inc.

FULTON AVENUE

CORNELIA AVENUE

THORENS AVENUE

ATLANTIC AVENUE

HUB SPRING

GARDEN CITY TRANS MIX

35 FT STACK (EXISTING)

RADONAWAY RP-265 DEPRESSURIZATION FAN

2" STEEL PIPING (TYP.)

6" PVC SCH 40

BURIED ELECTRICAL SERVICE LINE IN PVC CONDUIT (SAW CUT AND REPAIR ASPHALT)

FORMER DRY WELL

NEW DEDICATED ELECTRICAL SERVICE LINE IN OVERHEAD PVC CONDUIT

OFFICE OFFICE OFFICE OFFICE

2" STAINLESS STEEL WELL SCREEN, MAX. 5' SCREEN LENGTHS, 0.020" SLOT (TYP.)

6" PVC SCH 40

EXISTING ELECTRICAL SERVICE PANEL

TRANSFORMER

SAFETY BOLLARD (TYP.)

BAY DOOR

NEW DEDICATED ELECTRICAL SERVICE 15A CIRCUIT BREAKER

OFFICES

BREAK ROOM

RESTROOM

RESTROOM

RESTROOM

STORAGE

SLOP SINK

OFFICES

SS-1 -.011

SS-2 -.006

SS-3 -.011

SS-4 -.035

SS-5 -.020

SS-6 -.026

SS-7 -.044

STORAGE

OFFICE

OFFICE

FURNITURE ASSEMBLY ROOM

OFFICE

.04

.03

.02

.01

WAREHOUSE AREA

PSE & G TRANSFORMER AREA

LOADING DOCK

LEGEND

- .03 — VACUUM CONTOUR IN INCHES OF WATER COLUMN (" WC)
- PROPERTY BOUNDARY
- FENCED AREA
- EPA SUB SLAB SAMPLING/GAUGING POINT (FEBRUARY 2017)
- -.020 VACUUM READING IN " WC

NOTE:
NEW MODIFICATIONS ARE INDICATED IN GREEN.

0 30 60

GRAPHIC SCALE IN FEET

TITLE

SUB-SLAB DEPRESSURIZATION
150 FULTON AVENUE
GARDEN CITY PARK, NY

PREPARED FOR

GENESCO INC.

Environmental Resources Management

DRAWN BY	SCALE	DATE	JOB NO.	FIGURE
JPM/EMF	GRAPHIC	4/17/18	0097881	1

M:\Scout\Projects\GENESCO\150 Fulton Ave\NY\CAD\0097881\2018-02 - Fulton Avenue - Vacuum Readings.dwg (04/17/2018 - 2:16pm Melville)

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

Per 2016 SOW Attachment 1: Monitoring Well Sampling Program

Group 1 Wells are as follows:

GCP-01 S/D
GCP 08
GCP-18 S/D
GCP-15S
MW15 A-B
MW20 A-C
MW22 A-C
MW23 A-D

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

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

Group 2 Wells are as follows:

MW21 A-D

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

Year 1 – quarterly, to commence approximately 30 days after completion of construction of MW21 D and MW28 A-H
Year 2 – semi-annually (every six months)
Year 3 – semi-annually (every six months)
Year 4 – no sampling and analysis
Year 5 (and beyond) – once in year 5 and every 24 months thereafter.

Group 3 Wells are as follows:

MW26 A-H
MW27 A-H
MW28 A-H

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

Year 1 – quarterly, to commence approximately 30 days after completion of construction of MW21 D and MW28 A-H
Year 2 –9 of 24 zones with EPA approval of the specific zones, semi-annually (every six months)
Year 3 – 9 of 24 zones with EPA approval of the specific zones, semi-annually (every six months)
Year 4 – no sampling and analysis
Year 5 (and beyond) – once in year 5 and every 24 months thereafter.

ATTACHMENT 1

PHOTO LOG - SSDS SYSTEM MODIFICATION & VAPOR MONITORING POINTS

Photograph: 1	Sub Slab Venting System Stack Piping To Be Modified

Photograph: 2	Excavation Area To Modify Piping For Fan Installation

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Fulton Avenue Superfund Site
150 Fulton Sub-Slab Venting System Modification/Fan Installation

ERM Project Number 0997881

Date: 01/11/18

Photograph: 3	Work Area To Modify Piping & Install Fan

Photograph: 4	Excavation To Pipe Union In Order To Modify Piping For Fan Installation

Photograph: 5	Confirming Plumb of Piping Modification For Fan Installation

Photograph: 6	Confirming Plumb of Piping Modification For Fan Installation

Photograph: 7	Installed Fan Brand/Model/Serial Sticker

Photograph: 8	Installed Fan, New Piping, Electrical Conduit & Temporary Asphalt Patch

Photograph: 9	Installed Fan, New Piping, Electrical Conduit & Temporary Asphalt Patch

Photograph: 10	Installed Fan, New Piping, Electrical Conduit & Temporary Asphalt Patch

Photograph: 11	Installed Fan, New Piping, Electrical Conduit & Temporary Asphalt Patch

Photograph: 12	Installed Sample Port and Flow Measurement Port

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Fulton Avenue Superfund Site
150 Fulton Sub-Slab Venting System Modification/Fan Installation

ERM Project Number 0997881

Date: 02/02/18

Photograph: 13	Installed Vacuum Gauge (Minihelic)

Photograph: 14	Installed Sample Port, Flow Measurement Port and Vacuum Gauge

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Fulton Avenue Superfund Site
150 Fulton Sub-Slab Venting System Modification/Fan Installation

ERM Project Number 0997881

Date: 02/02/18

Photograph: 15	Installed Sample Port, Flow Measurement Port and Vacuum Gauge

Photograph: 16	Electrical Panel Supplying Power To Fan

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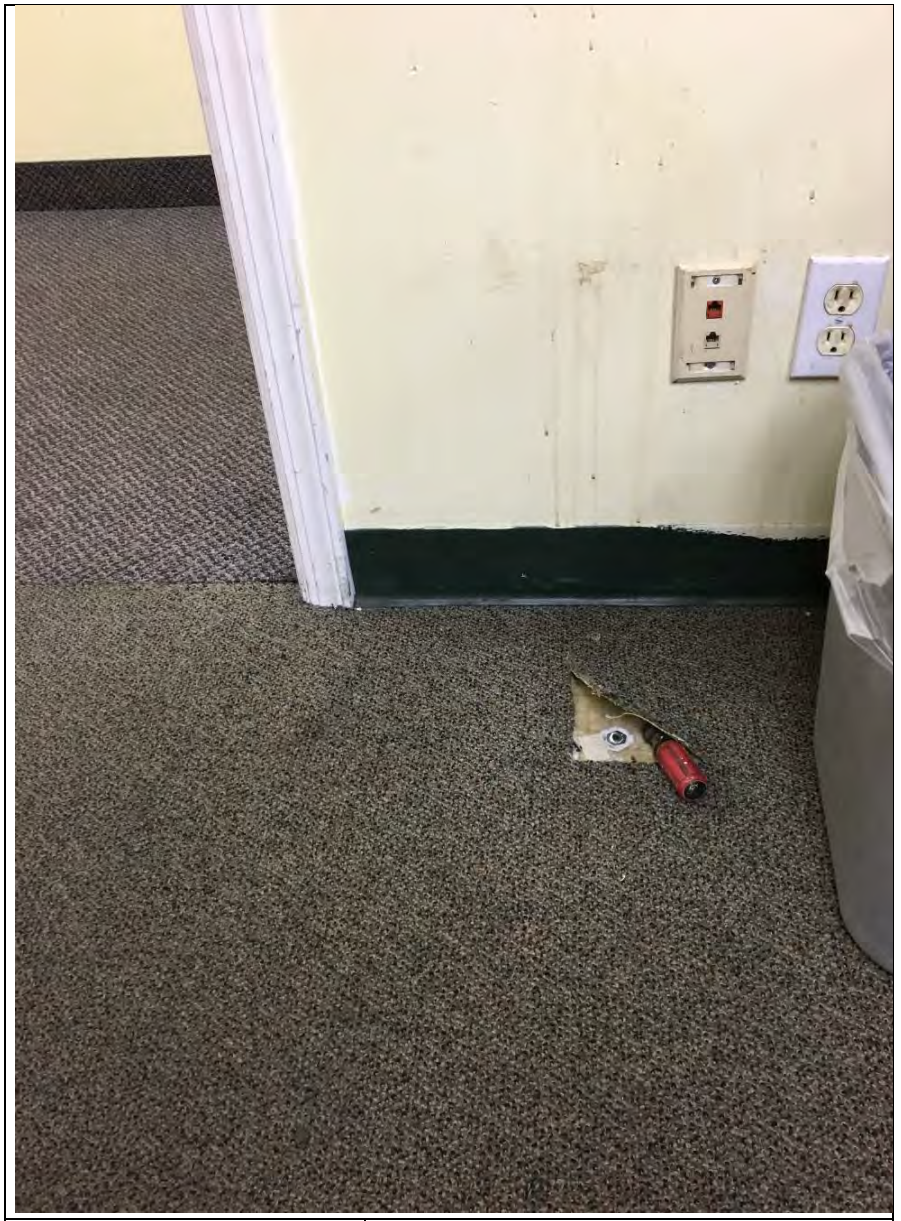
Fulton Avenue Superfund Site
150 Fulton Sub-Slab Venting System Modification/Fan Installation

ERM Project Number 0997881

Date: 02/02/18

Photograph: 17	Circuit Breaker Location For Fan In Electrical Panel



Photograph: 18	Location of USEPA VMP-01

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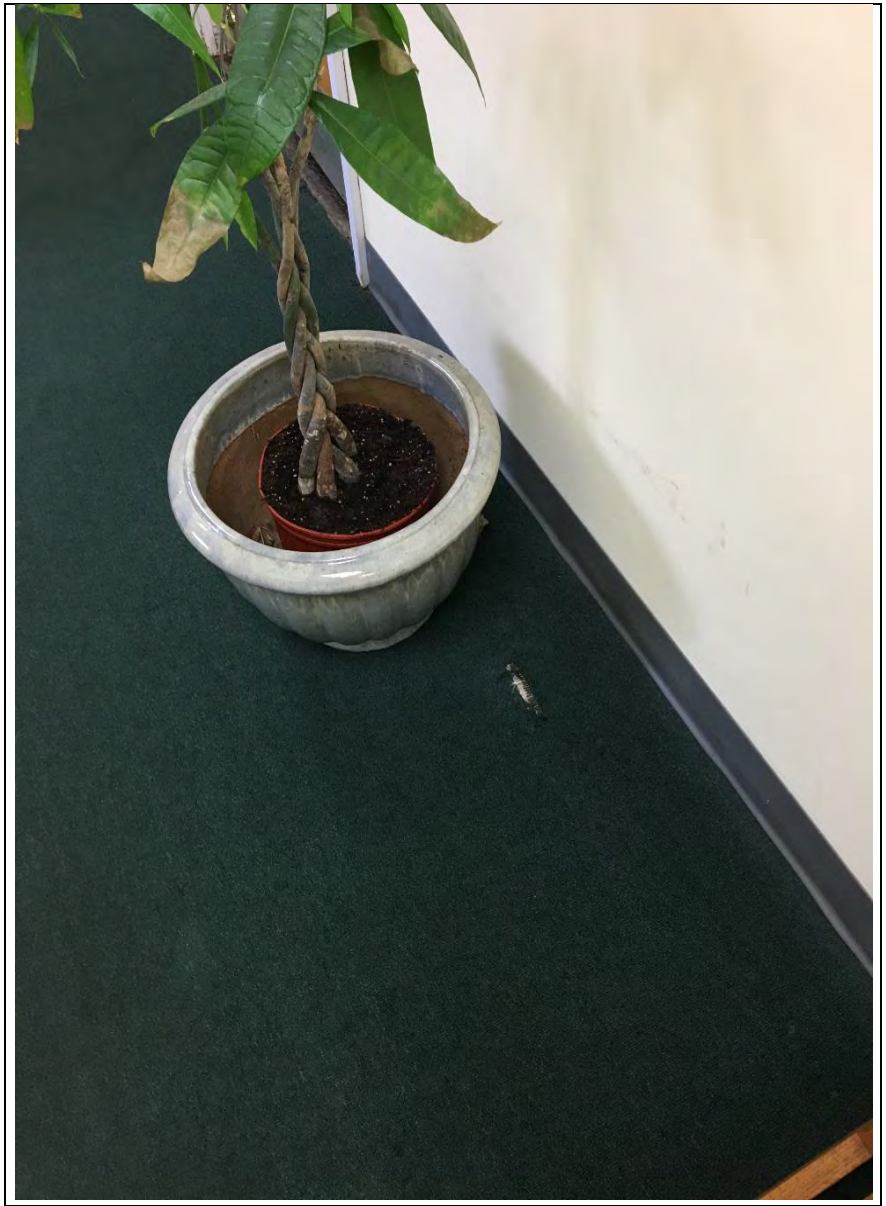
Fulton Avenue Superfund Site
150 Fulton Sub-Slab Venting System Modification/Fan Installation

ERM Project Number 0997881

Date: 02/02/18



Photograph: 19	Location of USEPA VMP-02

Photograph: 20	Location of USEPA VMP-04

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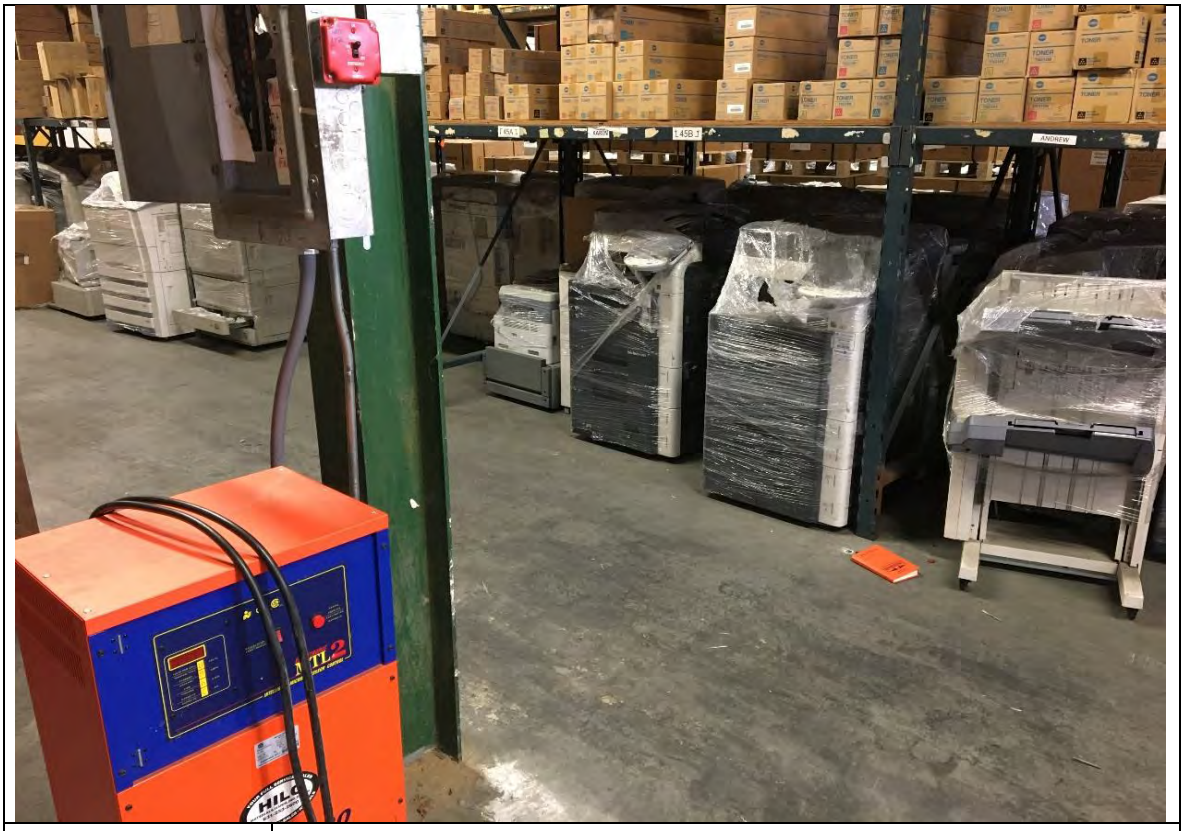
Fulton Avenue Superfund Site
150 Fulton Sub-Slab Venting System Modification/Fan Installation

ERM Project Number 0997881

Date: 02/02/18



Photograph: 21	Location of USEPA VMP-05

Photograph: 22	Location of USEPA VMP-07

Photograph: 23	Location of USEPA VMP-06

Photograph: 24	Location of USEPA VMP-08

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Fulton Avenue Superfund Site
150 Fulton Sub-Slab Venting System Modification/Fan Installation

ERM Project Number 09978841

Date: 02/02/18