



28 August 2019
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: Second Quarter 2019 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 Second Quarter 2019 (April – June) Progress Report for the Fulton Avenue Superfund Site (Site).

OPERABLE UNIT 1 REMEDIAL DESIGN & INTERIM REMEDIAL ACTION

During the reporting period, 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 Remedial Design (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 2016-2018, remedial design (RD) activities included installation of new groundwater monitoring wells, preparation and/or update of guiding documents were completed and approved by EPA, completion of required evaluations and submittal of resultant deliverables to EPA including the OU1 RD Report. The August 2018 revised final OU1 RD Report was approved on 25 March 2019. Thus, RD activities are complete and remaining significant OU1 RA activities for which the Settling Defendant is responsible are:

- Long-term groundwater monitoring and reporting (Table 1 & Figure 1);
- Maintenance of the associated groundwater monitoring wells and the sub-slab depressurization/venting system (SSDS) at the 150 Fulton Avenue property; and
- Submittal of an OU1 RA Report, triggered by EPA's approval of the OU1 RD Report.



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.

Progress Reporting

The First Quarter 2019 Quarterly Progress Report presented three attachments containing the results of the:

- March 2019 Long-Term Groundwater Monitoring (Semi-Annual);
- March 2019 150 Fulton Avenue Sub-Slab and Indoor Air Sampling; and
- First Quarter VGC Water Supply Well Monitoring.

VGC Water Supply Well Monitoring

The VGC continued operations and maintenance (O&M), monitoring and protection (treatment) of VGC water supply wells 13 and 14. In July 2019, the VGC provided new sampling results and pumpage records (April through June 2019) for VGC water supply wells 9, 13 and 14. The pumpage records indicate that nearby Well No. 9 was not operated during September 2017 – May 2018, and has not been operated much nor been sampled since the summer of 2017.

The new data were incorporated into the existing database set, and used to update corresponding charts for the Well Nos. 13 & 14 showing PCE and 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 2 & 3, respectively.

Figure 4 presents average concentrations of PCE and TCE (and the corresponding PCE/TCE ratio) for each of the three wells by year (2001 – 2018), and plots of average annual PCE and TCE concentrations versus time for each of the three wells for comparative viewing. The data and resultant plots indicate that since 2007, the annual average concentrations of PCE have been steadily declining in Well Nos. 13 & 14 until 2018 when the average PCE concentrations in Well Nos. 13 & 14 modestly increased to a level higher than it had been since 2011 and 2013, respectively. 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 (µg/L)	2018 Average (µg/L)	Difference of Averages	% Change of Averages
No. 13 (N-07058)		6/4/2007			
PCE	1,020	722.6	413.6	-309.0	-43%
TCE	91.5	90.0	40.0	-50.0	-56%
No. 14 (N-08339)		10/27/2007			
PCE	769	370.1	231.6	-138.5	-37%
TCE	69	38.9	26.5	-12.4	-32%



Remedial Action Report

An OU1 RA Report is required following EPA's approval of the OU1 RD Report. A draft OU1 RA Report is being prepared in general conformance with applicable portions of the 2016 SOW. It is anticipated that a draft of this document will be submitted to EPA in late September 2019. The document will present key summaries specified in the 2016 SOW such as:

- Introduction, Site Background and History;
- Construction Events: i.e., groundwater monitoring well installations to complete the Field Maintenance Activities;
- Performance and Quality Control;
- Final Inspections and Certifications: groundwater monitoring wells and institutional controls such as the Nassau County groundwater use moratorium; and
- Summary of Project Costs.

UPCOMING 2nd QUARTER 2019 ACTIVITIES

Long-Term 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 Site Management Plan). Accordingly, long-term groundwater monitoring has transitioned to the semi-annual schedule specified for Year 2 in Table 1. Group 1, 2 and 3 monitoring well locations are shown in Figure 1. The second 2019 semi-annual event was completed 12-23 August consists of sampling of the following wells:

- Group 1 (18 wells): Wells GCP-01S/D, GCP-08, GCP-18S/D, GCP-15S, MW15A-B, MW20A-C, MW22A-C & MW23A-D;
- Group 2 (4 wells): Wells MWs 21A-D; and
- Group 3 (3 multi-level well systems/24 well zones): Wells MWs 26A-H, 27A-H, 28A-H.

Investigative Derived Waste (IDW) Management & Disposal

The IDW generated from the August 2019 groundwater sampling event (monitoring well purge water) is being 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. The IDW for the August 2019 groundwater sampling events will be transported to the disposal facility in September 2019.

Groundwater Monitoring Well Inspections

Recently completed well inspections indicate that 13 wells are in need of repair where the protective roadway boxes/concrete pads must be replaced to ensure the wells are sealed and secure. (Note the wells were installed in 2003-2004 so the existing well protective roadway boxes/concrete pads are 15+ years old.) The repairs are scheduled for the week of 9 September, and the necessary permits/approvals are being coordinated with the VGC.



Quarterly Progress Reporting To EPA

Quarterly progress reports are required in accordance with the 15 August 2016 CJ/SOW. The 3rd Quarter 2019 report is due to EPA on 10 October and will include:

- As summary of work completed during the 3rd Quarter 2019 including the groundwater sampling event, well maintenance activities, and preparation and submittal of the draft RA Report;
- The August 2019 groundwater monitoring data deliverable package;
- An update on the VGC's well rehabilitation projects at public supply wells 9, 13 and 14;
- A new set of sampling and pumpage records for VGC water supply wells 9, 13 and 14 that will be presented in updated tables and figures presenting pumpage and water quality sampling results for public supply well nos. 9, 13 and 14.

VGC Water Supply Well Monitoring

A new set of sampling and pumpage records for VGC water supply wells 9, 13 and 14 through September 2019 will be obtained, and the updated charts and tables will be presented in the 3rd Quarter 2019 Progress Report in October 2019.

Remedial Action Report

The RA schedule included as Figure 3 of the Final RD Report shows completion and submittal to EPA within six months of EPA's written notification of approval of the OU1 RD Report (25 March 2019). A RA Report will be submitted to EPA no later than 30 September 2019. An updated schedule is attached.

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,

A handwritten signature in blue ink that reads "Chris W. Wenczel".

Chris W. Wenczel, P.G.
Consultant Director/Hydrogeologist

Attachments

cc: Andrea Leshak, Esq., USEPA
Doug Garbarini, USEPA
Robert Kambic, USDOJ
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John Swartwout, NYSDEC
Paul Williams, Genesco Inc.
Thor Urness, Esq., Bradley
Melissa Ballengee Alexander, Esq., Bradley
James Periconi, Esq., Periconi, LLC
James Perazzo, ERM Consulting & Engineering, Inc.

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:

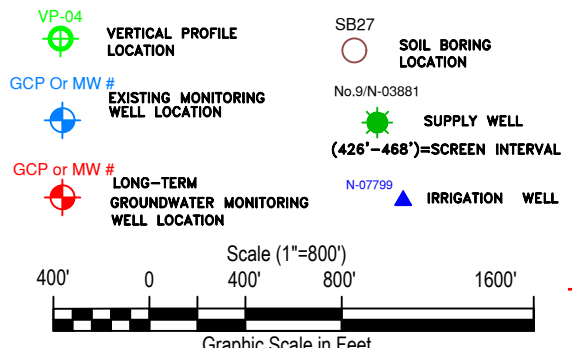
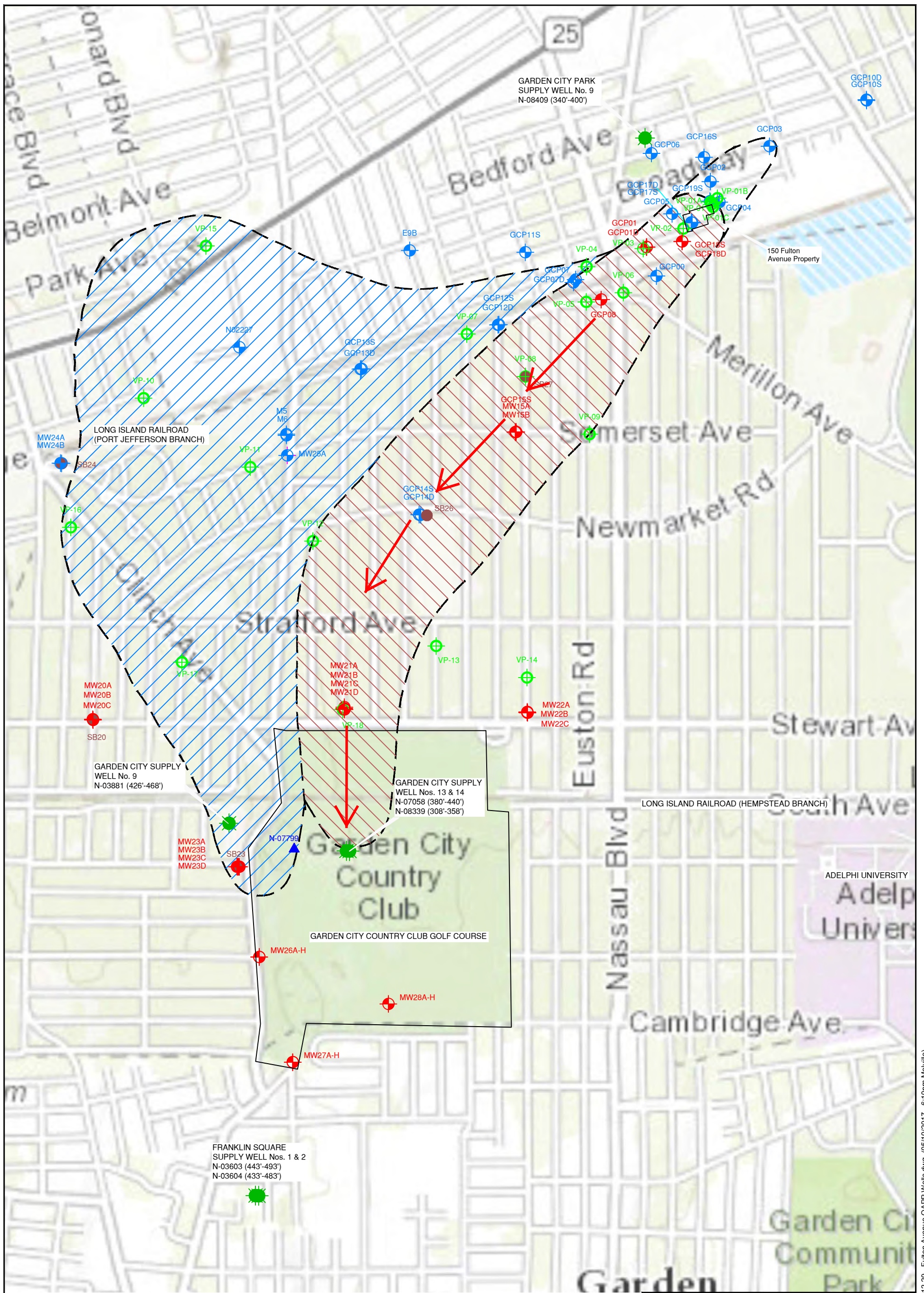
Year 1 – quarterly, to commence approximately 30 days after completion of construction of MW21 D and MW28 A-H
Year 2 – semi-annually (every six months)
Year 3 – semi-annually (every six months)
Year 4 – no sampling and analysis
Year 5 (and beyond) – once in year 5 and every 24 months thereafter.

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.



HISTORICAL EXTENT OF OU1 PLUME (TETRACHLOROETHENE {PCE}-DOMINANT PLUME) WHERE THE TOTAL VOLATILE ORGANIC CONCENTRATION WAS >100 UG/L*
 HISTORICAL EXTENT OF OU2 PLUME (TRICHLOROETHENE {TCE}-DOMINANT PLUME) WHERE THE TOTAL VOLATILE ORGANIC CONCENTRATION WAS >100 UG/L*

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

GENERALIZED GROUNDWATER FLOW PATH

Long-Term Groundwater Monitoring Well Network Well Locations Fulton Avenue Superfund Site Garden City/Garden City Park, NY			
PREPARED FOR Genesco Inc.			
Environmental Resources Management		FIGURE 1	
DRAWN BY	SCALE	DATE	JOB NO.
EMF	AS SHOWN	10/04/16	0097881

FIGURE 2
HISTORICAL TETRACHLOROETHENE & TRICHLOROETHENE CONCENTRATIONS AND MONTHLY WELL PUMPAGE: JANUARY 2007 - JUNE 2019
PUBLIC WATER SUPPLY WELL # N-07058 (GARDEN CITY WELL NO. 13), GARDEN CITY, NEW YORK

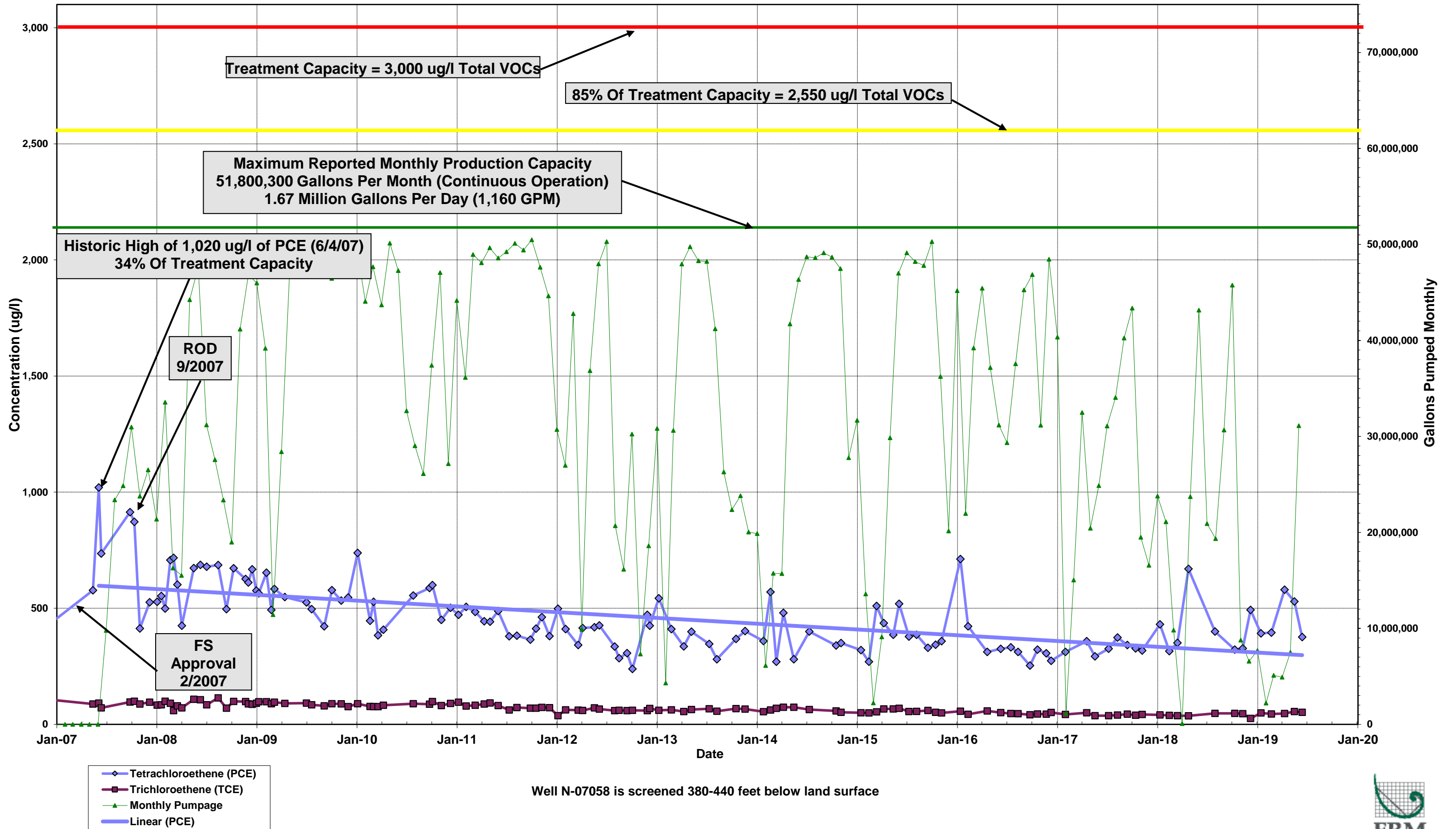


FIGURE 3
HISTORICAL TETRACHLOROETHENE & TRICHLOROETHENE CONCENTRATIONS AND MONTHLY WELL PUMPAGE: JANUARY 2007- JUNE 2019
PUBLIC WATER SUPPLY WELL # N-08339 (GARDEN CITY WELL NO. 14), GARDEN CITY, NEW YORK

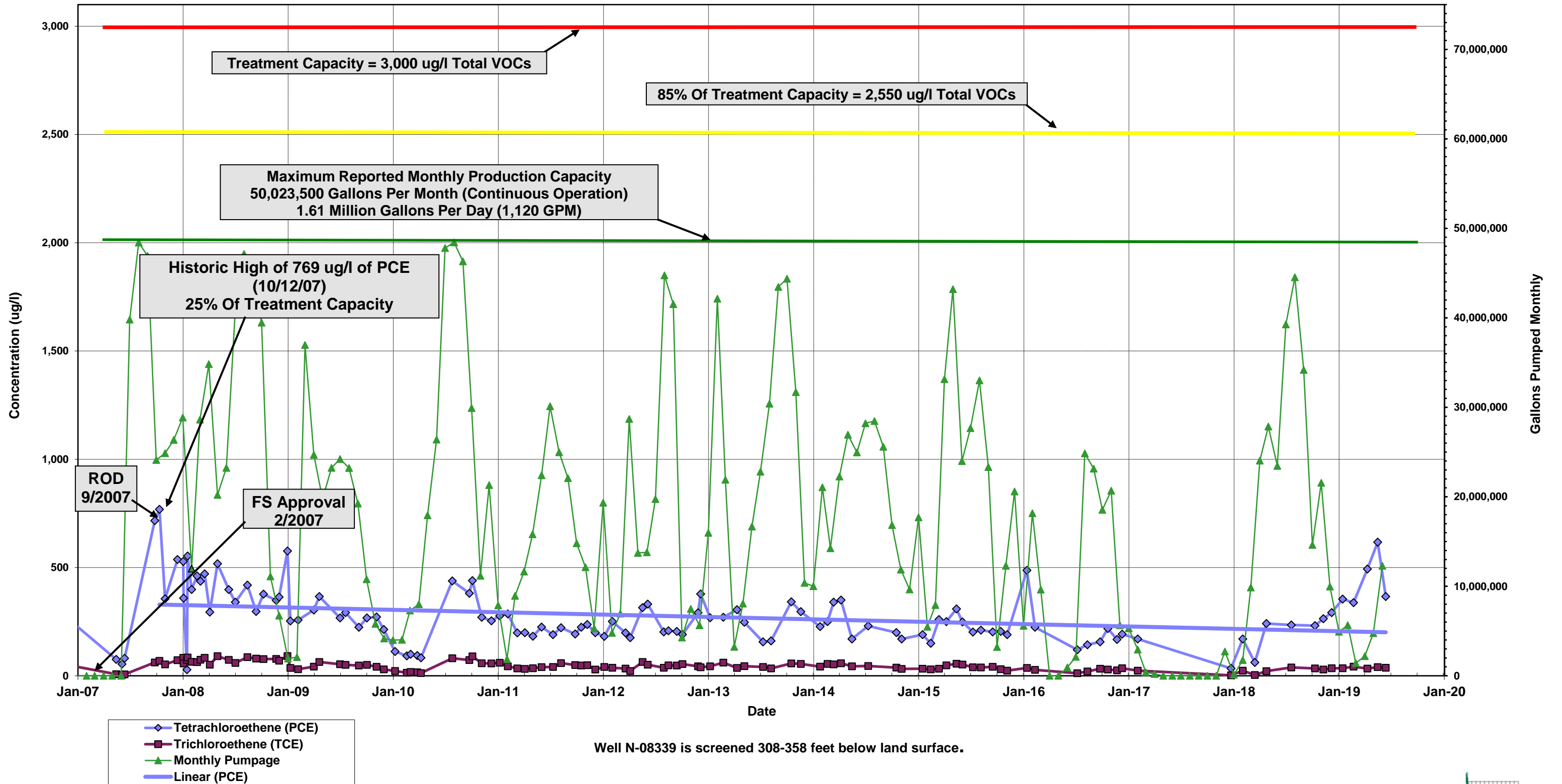
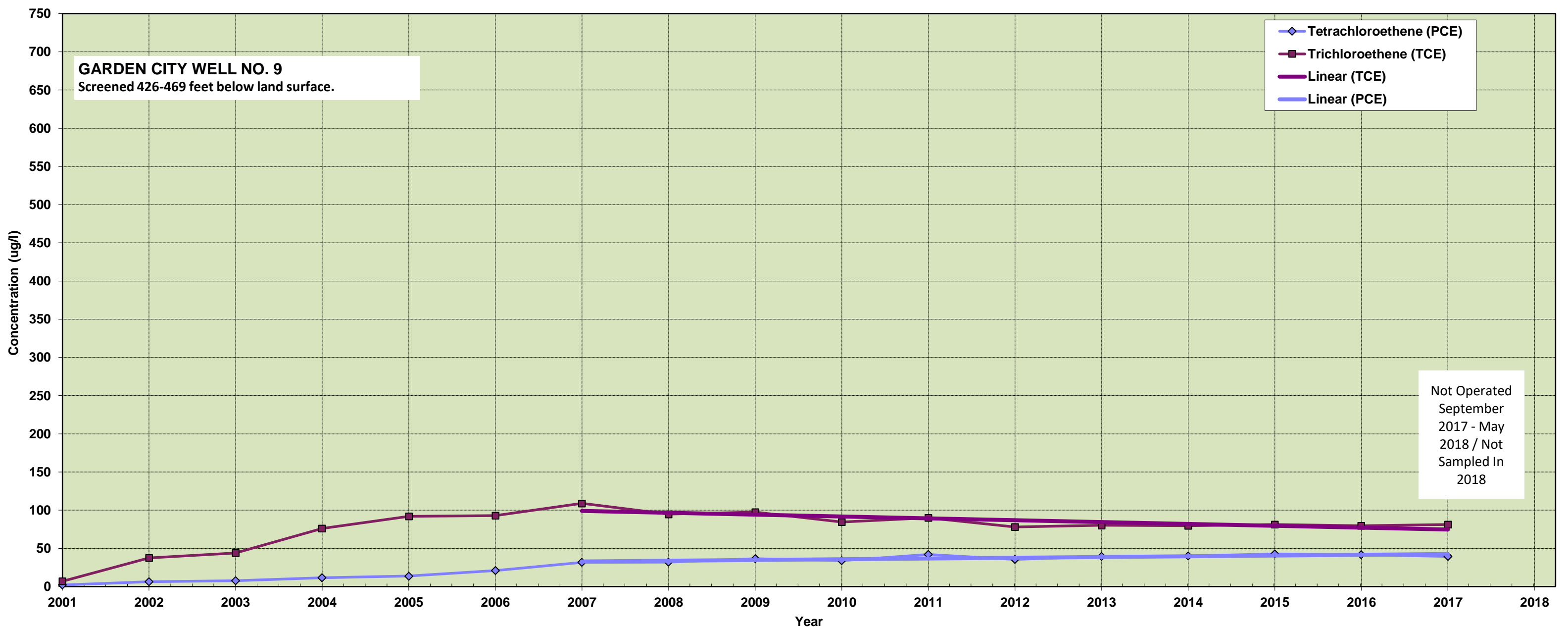
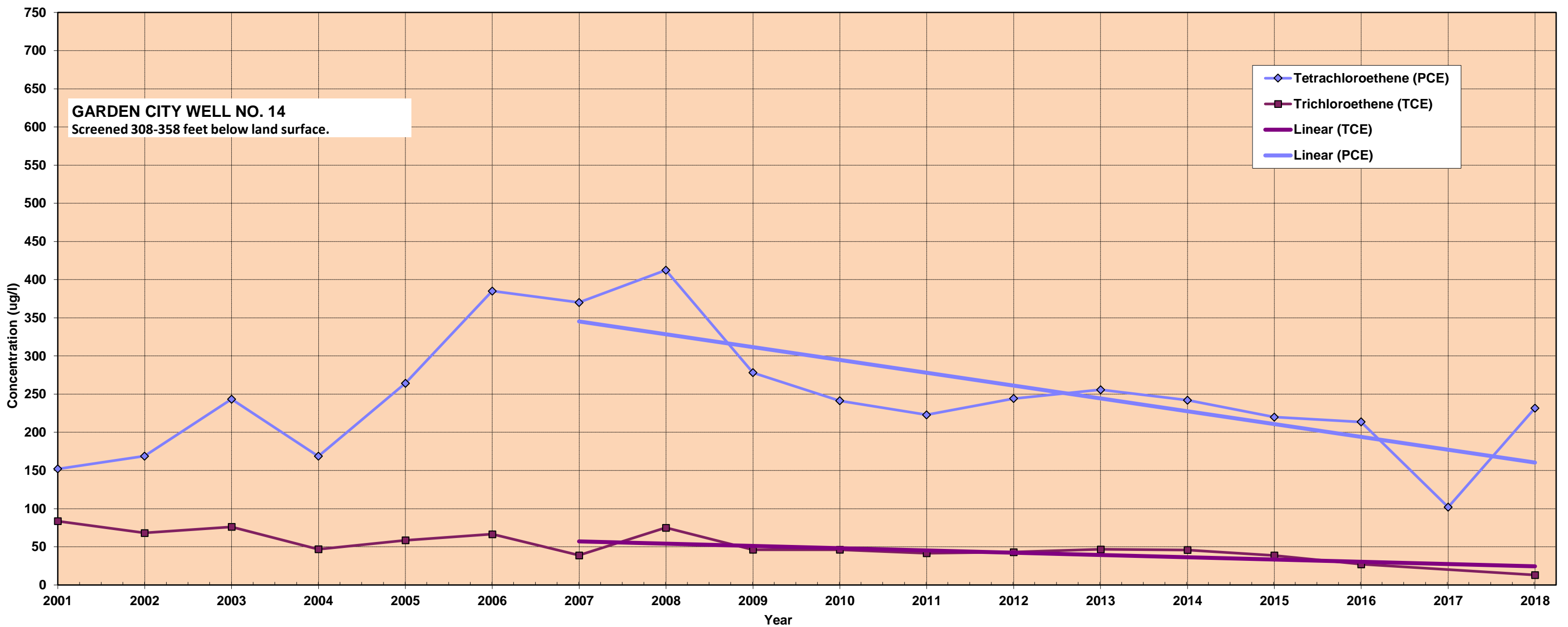
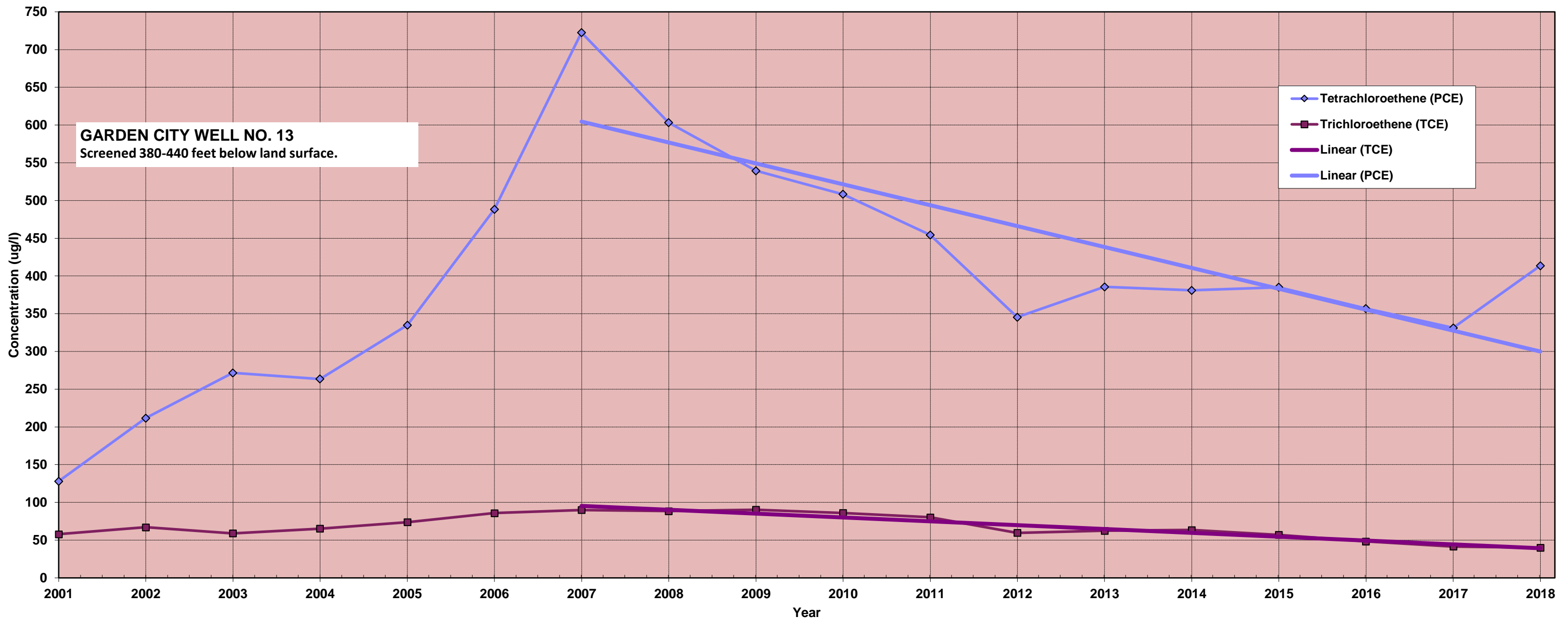


FIGURE 4
HISTORIC AVERAGE TETRACHLOROETHENE AND TRICHLOROETHENE CONCENTRATIONS BY YEAR 2001 - 2018
GARDEN CITY PUBLIC WATER SUPPLY WELL NOS. 9, 13 14, GARDEN CITY, NEW YORK



Year	2001		2002		2003		2004		2005		2006		2007		2008		2009		2010		2011		2012		2013		2014		2015		2016		2017		2018		
	Compound	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE	PCE	TCE				
Well No. 13 (N-07058)	Average Concentration	128.0	57.8	211.8	67.0	271.7	59.0	263.6	65.3	335.0	73.9	488.3	85.8	722.6	90.0	603.4	88.5	539.5	90.3	508.3	86.1	454.3	80.2	345.4	59.7	385.5	62.5	381.1	63.4	385.1	57.1	357.0	48.3	331.3	41.6	413.6	40.0
	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		6.2		6.0		6.7		7.4		8.0		8.0		10.3	
Well No. 14 (N-08339)	Average Concentration	152.0	83.6	168.7	68.2	243.3	76.2	168.6	46.9	264.2	58.6	385.0	66.5	370.1	38.9	412.4	75.0	278.1	46.3	241.2	46.2	222.8	41.7	244.1	43.1	255.8	46.6	242.1	45.9	219.9	38.8	213.6	27.1	102.0	13.1	231.6	26.5
	Ratio PCE/TCE	1.8		2.5		3.2		3.6		4.5		5.8		9.5		5.5		6.0		5.2		5.3		5.7		5.5		5.3		5.7		7.9		8.0		8.7	
Well No. 9 (N-03881)	Average Concentration	2.1	7.0	6.6	37.5	7.9	44.0	11.6	76.0	13.7	92.0	21.0	93.0	31.6	109.0	32.0	94.8	36.4	97.5	33.9	84.6	42.0	90.0	35.7	78.1	39.5	80.2	40.1	79.6	42.8	81.2	41.8	79.8	39.4	81.2	Not Sampled In 2018	
	Ratio PCE/TCE	0.3		0.2		0.2		0.2		0.1		0.3		0.3		0.3		0.4		0.4		0.5		0.5		0.5		0.5		0.5		0.5		0.5		0.5	

Concentrations are in ug/l (ppb).





**UPDATED FIGURE 3 FOR REMEDIAL DESIGN REPORT
REMEDIAL ACTION AND MONITORING SCHEDULE
FULTON AVENUE SUPERFUND SITE : OPERABLE UNIT 1
NASSAU COUNTY, NEW YORK**

