SITE EVALUATION WORK PLAN PARCEL F3A

GRIFFISS BUSINESS AND TECHNOLOGY PARK ROME, NEW YORK

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LIST OF ACRONYMS AND ABBREVIATIONS

AST	Above-ground Storage Tanks
bgs	below ground surface
CERCLA COPCs	Comprehensive Environmental Response, Compensation, and Liability Act chemicals of potential concern
ESD	Explanation of Significant Differences
FPM ft	FPM Remediations, Ltd. feet
IRP	Installation Restoration Program
LUC/IC	Land-Use Control/Institutional Control
MS/MSD	matrix spike/matrix spike duplicate
NYSDEC NYSDOH	New York State Department of Environmental Conservation New York State Department of Health
RfDs ROD	reference dose values Record of Decision
SCO SRU SVOC	Soil Cleanup Objective silver recovery unit semivolatile organic compound
TAL	target analyte list
UCL USEPA	upper confidence limit United States Environmental Protection Agency
VOC	volatile organic compound

1.0 INTRODUCTION

FPM Remediations, Inc. (FPM), under contract with Mohawk Valley Edge, is conducting a site evaluation at the western portion (on western side of Hill Road) of Parcel F3A, located at the Griffiss Business and Technology Park in Rome, NY. The site location is illustrated in **Figure 1**.

2.0 SURFACE SOIL EVALUATION PURPOSE

The purpose of the evaluation is to determine the presence or absence of surface soil contamination. The absence of contamination would support the removal of land use restrictions within the western portion of Parcel F3A.

3.0 SITE BACKGROUND

3.1 Site Description

The western portion of parcel F3A is approximately 17.7 acres. Per the Environmental Baseline Survey, the subject area has one (1) Category 2 site where hazardous substances or petroleum products had been historically stored, but no known release, disposal, or migration from adjacent areas had ever occurred (Air Force, September 1994 and November 2005). The Category 2 area includes Building 245. The remainder of the subject area is Category 1 – open space.

3.1.1 Parcel F3A Use Restrictions

Groundwater use restrictions and non-residential use restrictions exist at Parcel F3A. The parcelwide restrictions are associated with historic Air Force operations at several Installation Restoration Program (IRP) sites located within the eastern portion of Parcel F3A (DP013, DP015, DP022, SD050). The groundwater restrictions were removed as site remedy requirements in 2012 following United States Environmental Protection Agency (USEPA) approval and New York State Department of Environmental Conservation (NYSDEC) acceptance. In addition, site closure activities including soil sampling have been performed at IRP sites DP013, DP015, and SD050 in 2013, 2014, and 2015. The results indicate there is no unacceptable non-carcinogenic and carcinogenic risk from exposure to soil for potential residential receptors. Therefore, removal of Land-Use Control/Institutional Control (LUC/ICs) and site closure were recommended for these IRP sites, with regulatory concurrence in 2016.

3.1.1.1 Western Portion of Parcel F3A Facilities and Environmental Conditions

Per the Environmental Baseline Survey, there is one (1) Category 2 site located within the western portion of Parcel F3A (Air Force, September 1994 and November 2005). The remainder of the western portion of Parcel F3A is open property. The Category 2 site is Building 245 located in the northern portion of the area. Building 245 was previously used as a Morale, Welfare, and Recreation Supply and Non-Appropriated Fund Central Storage facility and as an electronic test laboratory. More recently, the facility has been used for storage by GLDC. Other environmental conditions associated with this site include:

• An AST (AST-245) which stored Fuel Oil #2 (north side of the building).

- An above ground liquefied petroleum gas tank (OST 245) which stored propane.
- A drywell (DRY 245) which collected steam condensate and flow from the mechanical room floor.
- o Sand traps (WW 245) used to collect sand from the drains in the building
- An open storage area (OTH 245) near Building 245 which was originally used as a construction lay down area.

An additional AST (AST-272), which stored Fuel Oil #2, was also located within the southern portion of the property. The AST has been removed.

3.1.1.2 Environmental Use Restrictive Covenants

As stated in the Parcel F3A Deed, three Environmental Use Restrictive Covenants exist:

- The Grantee covenants to use the Parcel F3A of the Property for only industrial/commercial/non-residential purposes, unless prior consent for a different use is obtained from the USEPA and NYSDEC.
- The Grantee covenants not to extract, utilize, consume or permit any extraction, use, consumption, of any water from the aquifer below the surface of the ground within the Parcel F3A boundary unless the groundwater has been tested and found to meet all applicable standards and the Grantee first obtains the prior written approval from New York State Department of Health (NYSDOH). The Grantee further covenants to ensure that the aquifer will not be used in any way that could spread or exacerbate environmental contamination or open exposure pathways to humans or the environment. The Grantee and its successors and assignees covenant to comply with all applicable Federal and State laws and regulations with regard to activities affecting the groundwater of the aquifer. The Grantee will bear all costs associated with obtaining use of such water, including the costs of studies, analysis or remediation, without any cost whatsoever to the Grantor.
- The Grantee covenants not to disturb, move, damage, mar, tamper with, interfere with, obstruct, or impede any wells and treatment facilities and systems, and related piping used in the environmental remediation and restoration on the Property.

4.0 Groundwater Restriction Removal

The Air Force previously conducted groundwater monitoring at IRP sites DP013, DP015, SD050 and DP022, which indicated no volatile organic compounds (VOC) or semi-volatile organic compound (SVOC) exceedances of the NYSDEC groundwater standards (FPM, August 2003). Metals were detected and several exceedances (total metals) were observed, but the exceedances were attributed to basewide background conditions (identified during the Remedial Investigation (RI)). The results from the groundwater monitoring indicated that no further groundwater monitoring was required at these sites. Based on the results from the previous sampling and the Record of Decision (ROD) requirements for the DP013, DP015, SD050 and DP022 sites, the Air Force submitted an Explanation of Significant Differences (ESD) in 2003 to the USEPA. The document requested the deletion of ROD requirements for further groundwater investigations. The ESD was supported by the groundwater monitoring data indicating groundwater applicable or

relevant and appropriate requirements (ARARs) have been met. The ESD for these sites was signed by the USEPA on September 26, 2003.

The parcel wide groundwater use restriction was imposed as a result of the previous site-specific groundwater restrictions associated with the IRP sites located within the eastern portion of Parcel F3A (DP013, DP015, DP022, SD050). Groundwater restrictions at IRP sites in the eastern portion of F3A were removed as site remedy requirements with approval the USEPA and acceptance by the NYSDEC in 2012. No groundwater evaluation is proposed as a result of the site-specific groundwater restriction removal. In addition, no known releases occurred within the western portion of Parcel F3A or AFRL-1 according to the Griffiss Environmental Baseline Survey (Air Force, November 2005).

5.0 Soil Sampling

NYSDEC and New York State Department of Health (NYSDOH) have indicated that soil samples from 0 to 2-inches and 0 to 2-feet (ft) below ground surface (bgs) will need to be collected from the western portion of Parcel F3A to determine fitness for residential use.

Samples will be collected at 10 soil borings as illustrated in **Figure 1**. Two samples will be collected at each boring, one from 0 to 2-inches bgs and one from 2-inches to 2 ft bgs. For the 0 to 2-inch surface soil samples, the sample collection method will be to remove any existing ground cover (e.g. grass through the root zone, gravel, asphalt or concrete including sub-base aggregate) and collect soil samples from the upper 2 inches of underlying soil. The soil samples collected from 2-inches to 2-ft bgs will be collected using a Geoprobe[®] rig.

Prior to collecting the soil samples, FPM will conduct a site reconnaissance to field-truth the actual sample locations based on the proposed locations on **Figure 1**. If sample locations need to be adjusted based on obstructions due to site features, FPM will adjust the sample location figure and obtain NYSDEC/NYSDOH concurrence prior to collecting the soil samples. Each soil sample location will be field-verified by GPS survey at the time of sample collection.

The soil samples will be analyzed for VOCs (USEPA method 8260), SVOCs (USEPA Method 8270), and target analyte list (TAL) metals (USEPA Method 6010/7471), and compared to the 6 NYCRR Part 375 Residential use Soil Cleanup Objectives (SCOs) (NYSDEC, December 2006) for residential soil. One duplicate sample and one matrix spike/matrix spike duplicate (MS/MSD) will also be collected.

6.0 Reporting

FPM will prepare a Summary Report of finding that compares the soil analytical results to the NYSDEC 6 NYCRR Part 375 Residential SCOs and identify sample locations at which the SCOs are exceeded. The Report will include a description of the sample collection event and methods, field observations, surveyed locations of the sample locations depicted on a site map, summary tables of analytical results, and the validated laboratory reports.

6.1 Data Evaluation

If any exceedances are observed at any of the sampling locations, the data will be further evaluated to determine if the exceedances represent a statistically-valid contravention of cleanup criteria, using a 95% upper confidence level (UCL) analysis.

6.2 Restriction Removal Recommendation

Restriction removal will be recommended in the Summary Report if:

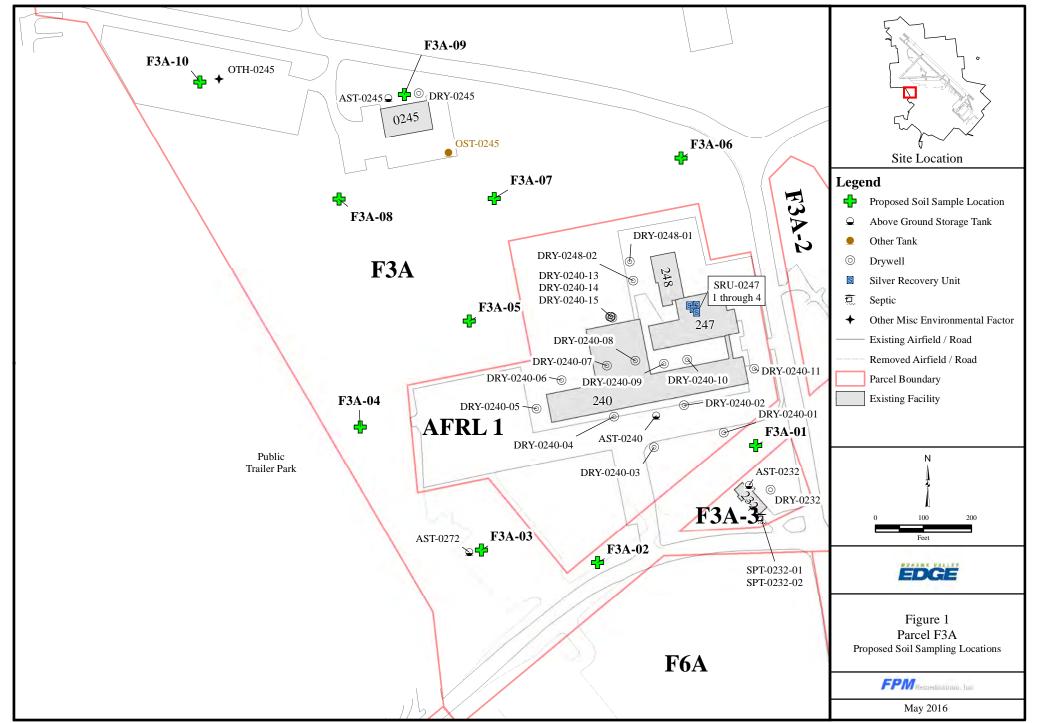
- all detected samples are at concentrations below 6 NYCRR Part 375 Residential use SCOs, or
- the 95% UCL analysis shows the sample data population is statistically similar to 6 NYCRR Part 375 Residential use SCOs.

7.0 REFERENCES

- Air Force, Basewide Environmental Baseline Survey for the Griffiss Air Force Base, September 1994.
- Air Force, Updated Basewide Environmental Baseline Survey for the Griffiss Air Force Base, November 2005.
- FPM Group, Ltd., Final Annual Groundwater Monitoring Report for the Tin City AOC at the Former Griffiss AFB, August 2003
- NYSDEC, Subpart 375-6: Remedial Program Cleanup Objectives. http://www.dec.ny.gov/regs/15507.html, effective December 14, 2006.
- USEPA, Risk Assessment Guidance for Superfund, Volume 1: Human Health Evaluation Manual (Part A), December 1989.
- USEPA, ProUCL Version 5.0.00, Statistical Software Package for Environmental Applications for Data Sets With and Without Nondetect Observations, ProUCL 5.0.00 can be freely downloaded from the EPA website: http://www.epa.gov/esd/tsc/software.htm., September 2013a.

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Figure



Appendix A Field Forms

SOIL / SEDIMENT SAMPLING FORM

Project:	Sampled by:
Site and Site Code (SITEID):	
Sampling Location ID. (LOCID):	
Date (LOGDATE):	Time:

FIELD OBSERVATIONS:

Sample Depth or Interval	Material Description/ Color

Comments/Observations:

Sample Time: _____ Sample ID: _____