



# SENECA ARMY DEPOT ROMULUS, NY

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## Announcements and Key Topics

### PFAS - Current Status:

On March 14, 2023, EPA announced the proposed National Primary Drinking Water Regulation (NPDWR) for six PFAS including perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid (PFOS), perfluorononanoic acid (PFNA), hexafluoropropylene oxide dimer acid (HFPO-DA, commonly known as GenX Chemicals), perfluorohexane sulfonic acid (PFHxS), and perfluorobutane sulfonic acid (PFBS). The proposed PFAS NPDWR does not require any actions until it is finalized. EPA anticipates finalizing the regulation by the end of 2023 after public comment. The proposed Maximum Contaminant Level (MCL) for PFOS and PFOA will be 4.0 parts per trillion (also expressed as ng/L) each. See <https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>

NYSDEC has promulgated MCLs of 10 ppt each for PFOS and PFOA.

### PFAS Recent and Future Planned Investigations at the former Seneca Army Depot

Investigation of the emerging contaminants known as per and polyfluoroalkyl substances (PFAS) is ongoing at the former depot. The Army completed fieldwork for the Expanded Site Investigation (ESI) for PFAS at 3 sites in 2021: SEAD-25 (Fire Training and Demonstration Pad), SEAD-26 (Fire Training Pit and Area) and the Firehouse (Building 103). The ESI included sampling and analysis of soil, groundwater, and surface water for PFAS at the former depot. EPA and NYSDEC provided review and comment on the draft and draft final ESI Reports, and EPA approved the Army's Response to Comments on the draft final Report in January 2022. The ESI concluded that additional investigation was required to further define the nature and extent of PFAS contamination at the 3 sites, and that a Remedial Investigation (RI) was needed. The Army submitted the draft RI Work Plan and Quality Assurance Project Plan (QAPP) to the regulators in November 2022. The Work Plan and QAPP were revised in response to EPA and NYSDEC comments and are currently under review by the regulators. The Army plans to begin fieldwork for the RI in the summer of 2023. The RI will

include sampling and analysis of soil, groundwater, surface water, and sediment at the 3 ESI sites, as well as at 2 sites at the airfield - SEAD-122D (Hot Pad Spill) and SEAD-122E (Plane Deicing Pads), which were originally investigated during the initial Site Investigation (SI) at the former depot.

Additionally, the Army conducted a Preliminary Assessment (PA) addressing potential PFAS sources across the entire former depot in 2022. Consisting primarily of a historic records review of operations across the former depot, the PA Report was approved by EPA in June 2022. The PA Report recommended further investigation via an SI at 36 sites at the former depot. These sites include potential aqueous film forming foam (AFFF) sources, as well as other sources. AFFF was historically used by the Army for fire suppression. The Army plans to submit a draft Work Plan for the 36 Site SI in the Spring of 2023.

Because the full nature and extent of PFAS contamination at the former depot has not yet been defined, EPA has requested that the Army conduct a survey of private drinking water wells located within one mile of the former depot boundary as soon as possible. It is EPA's understanding that there are no private wells located within the boundary of the former depot, as drinking water was historically provided by a municipal water supply, the source of which was located off-depot.

### **Off-depot Groundwater Well Sampling:**

Sampling of 22 off-depot drinking water wells for PFAS was conducted by NYSDOH in 2018. None of the wells had PFAS above EPA's Health Advisory Level (HAL) at the time of 70 parts per trillion (ppt). The Army is currently coordinating with NYSDOH on its well survey.

### **Future Land Use and Potential PFAS Contamination:**

To the west, and downgradient, of SEADs-25 and 26 is a section of the former depot that has been designated for future farming use. In 2018, NYSDEC sent a letter to the Seneca County Industrial Development Agency (IDA) advising them of the potential risk of any future groundwater use within the farming area. Additionally, in February 2019, EPA, NYSDEC, and NYSDOH held a conference call with the Army, the IDA, the owner of 7,000 acres of former depot property and other stakeholders, during which the regulatory agencies made all of these stakeholders aware of the potential for PFAS contamination in groundwater, and of the ongoing and planned PFAS studies.

### **Open Detonation (OD) Grounds**

A Proposed Plan for remediation of the OD Grounds developed by the Army has been reviewed and commented on twice by EPA and NYSDEC, and is currently under revision by the Army. It is hoped that the Plan will be released for public comment by September 2023. The Plan recommends excavation of the OD Hill to grade with mechanical separation of UXO/DMM from that excavated soil, surface/subsurface munitions clearance over the entire site, excavation or capping of soils contaminated with munitions constituents, and Land Use Controls (LUCs).

## Public Participation Opportunities

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Public comment will be solicited by the Army when the Proposed Plan for the OD Grounds is released. A Proposed Plan may also be issued for PFAS, in which case public comment would also be solicited.

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