RECORD OF DECISION AMENDMENT

Fulton Avenue Superfund Site
First Operable Unit

Nassau County, New York

United States Environmental Protection Agency
Region 2
New York, New York
September 2015

372864

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APPENDICES

ATTACHMENTS to RESPONSIVENESS SUMMARY:

PART 1: DECLARATION

SITE NAME AND LOCATION

Fulton Avenue Superfund Site
Nassau County, New York
Superfund Identification Number: NY0000110247

STATEMENT OF BASIS AND PURPOSE

This Record of Decision (ROD) Amendment presents the amended interim remedial action for Operable Unit 1 (OU1) of the Fulton Avenue Superfund Site (the Site) located in the towns of North Hempstead and Hempstead in Nassau County, New York. This remedy was chosen in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. §§ 9601-9675, and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300. This decision document explains the factual and legal basis for selecting the amended OU1 remedy. The attached index (see Appendix III) identifies the items that compose the Administrative Record upon which the selected amended remedy is based.

The New York State Department of Environmental Conservation (NYSDEC) was consulted on the proposed amended remedy in accordance with CERCLA Section 121(f), 42 U.S.C. Section 9621(f), and concurs with the amended remedy (see Appendix IV).

ASSESSMENT OF THE SITE

The response action selected in this ROD Amendment is necessary to protect public health or welfare or the environment from actual or threatened releases of hazardous substances into the environment at the Site.

DESCRIPTION OF THE SELECTED REMEDY

The selected amended remedy is an interim remedy that provides for the continued protection of Village of Garden City (the Village) potable supply wells 13 and 14 from the OU1 portion of the groundwater contamination at the Site, which is primarily contaminated with tetrachloroethylene (PCE). This decision document amends the interim OU1 remedy selected in the U.S. Environmental Protection Agency’s (EPA’s) September 28, 2007 ROD by eliminating, in the interim, the groundwater pumping and

treatment system and the application of in-situ chemical oxidation (ISCO) that were part of the 2007 ROD. A final decision regarding groundwater restoration at the Site is expected to be made as part of OU2. The selected amended remedy for the Site includes the following major components:

- Continued operation, maintenance and monitoring (O&M) of the air stripping treatment systems currently installed on Village wells 13 and 14 in order to protect the public from exposure to Site-related volatile organic compounds (VOCs), including PCE, in groundwater entering those wells. These treatment systems will be maintained and replaced or upgraded as needed in order to ensure that water distributed to the public from wells 13 and 14 complies with applicable or relevant and appropriate requirements (ARARs), including the federal maximum contaminant levels (MCLs) under the federal Safe Drinking Water Act or, if more stringent, New York State drinking water standards at 10 NYCRR Part 5, Subpart 5-1. If needed, a vapor-phase carbon unit will be added to capture and treat VOCs being discharged from the air stripper treatment units. The pumping of supply wells 13 and 14 provides an incidental benefit of helping to reduce the mobility of contaminants in the OU1 portion of the plume. This ROD Amendment assumes the continued operation of Village wells 13 and 14 until those wells no longer are impacted by contaminants above the MCLs for PCE and trichloroethylene (TCE).

- A monitoring plan that will include groundwater sampling to monitor contaminant levels in groundwater at the Site. The monitoring program will include monitoring of contamination that is entering wells 13 and 14, monitoring of groundwater upgradient, sidegradient and downgradient of wells 13 and 14, and graphic depictions of the results.

- Institutional controls in the form of local laws that restrict future use of groundwater at the Site and limit exposure at the commercial facility located at 150 Fulton Avenue in Garden City Park, New York (the Fulton Property), a source of the groundwater contamination at the Site. Specifically, the Nassau County Sanitary Code regulates installation of private potable water supply wells in Nassau County. In addition, the commercial facility at the Fulton Property is zoned for industrial use, and the EPA does not anticipate any changes to the land use in the

foreseeable future. If a change in land use is proposed, additional investigation of soils may be necessary to determine whether the change in land use could affect exposure risks at the Fulton Property.

- A vapor intrusion evaluation of structures that are in the vicinity of the Fulton Property and that could potentially be affected by the OU1 portion of the groundwater contamination plume. An appropriate response action (such as sub-slab ventilation systems) may be implemented based on the results of the investigation. The O&M of the existing sub-slab ventilation system at the Fulton Property will continue to be operated and maintained.

- A site management plan (SMP) that will provide for the proper management of all OU1 remedy components, including compliance with institutional controls. The SMP will include: (a) O&M of the treatment systems on Village wells 13 and 14 as well as monitoring of Site groundwater upgradient, sidegradient and downgradient of wells 13 and 14; (b) conducting an evaluation of the potential for vapor intrusion, and an appropriate response action, if necessary, in the event of future construction at the Fulton Property; and (c) periodic certifications by the party(ies) implementing the remedy that any institutional and engineering controls are in place and being complied with.

DECLARATION OF STATUTORY DETERMINATIONS

The selected amended remedy satisfies the statutory requirements of CERCLA § 121(b), 42 U.S.C. § 9601(b), as follows: This interim action is protective of human health and the environment in the short term and is intended to provide adequate protection until a final remedy for the Site is implemented; complies with those federal and state requirements that are applicable or relevant and appropriate for this limited-scope action; and is cost-effective. This OU1 action is an interim action only, and is not intended to utilize permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable. Because this action does not constitute the final remedy for the Site, the statutory preference for remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element will be addressed by the final response action decision for the Site. Subsequent actions are will be

evaluated to address fully the threats posed by conditions at the Site.

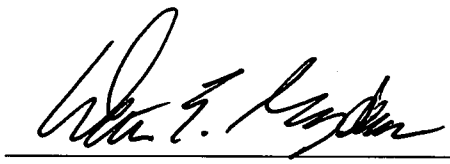
Because this remedy will result in hazardous substances remaining on-Site above health-based levels, a review will be conducted at least once every five years to ensure that the remedy continues to provide adequate protection of human health and the environment. Because this is an interim action ROD Amendment, review of the Site and this remedy will be ongoing as the EPA continues to develop remedial alternatives for the final response action.

ROD DATA CERTIFICATION CHECKLIST

The following information is included in the cited sections of the Decision Summary of this ROD Amendment. Additional information can be found in the Administrative Record file for the Site, the index of which is at Appendix III of this document.

- Contaminants of concern and their respective concentrations: Appendix II Tables 1 and 2;
- Baseline risk represented by the contaminants of concern: Summary of Site Risks and Appendix II Tables 3-8;
- Cleanup levels established for contaminants of concern and the basis for these levels: Remedial Action Objectives;
- A discussion of source materials constituting principal threats: Principal Threat Waste.
- Current and reasonably-anticipated future land use assumptions and current and potential future beneficial uses of groundwater used in the baseline risk assessment: Summary of Site Risks, Exposure Assessment;
- Potential land and groundwater use that will be available at the Site as a result of the selected remedy: Remedial Action Objectives;
- Estimated capital, annual operation and maintenance, and total present-worth costs, discount rate, and the number of years over which the remedy cost estimates are projected: Description of Alternatives, Comparative Analysis of Alternatives, Cost, Summary of Estimated Remedy Costs, and Appendix II, Table 9; and
- Key factors that led to selecting the remedy (*i.e.*, how the selected remedy provides the best balance of tradeoffs with respect to the balancing and modifying criteria,

emphasizing criteria key to the decision): Summary of the Rationale for the selected remedy.



9/30/2015

Walter E. Mugdan, Director
Emergency and Remedial Response Division
USEPA Region 2

Date

PART 2: DECISION SUMMARY

SITE NAME, LOCATION, AND DESCRIPTION

The Fulton Avenue Superfund Site (the Site) includes a 0.8-acre property located at 150 Fulton Avenue, Garden City Park, Nassau County, New York (the Fulton Property). In addition, the Site includes all locations impacted by contamination released at the Fulton Property, and all other contamination impacting the groundwater and indoor air in the vicinity of the Fulton Property. The Site also includes an overlapping groundwater contamination plume, primarily contaminated with trichloroethylene (TCE), in the Upper Glacial and Magothy aquifers, the origin(s) of which are not fully known but are under study by the EPA as part of the second operable unit (OU2) for the Site.

The Fulton Property is owned by Gordon Atlantic Corporation. It is located within the Garden City Park Industrial Area (GCPIA), Village of Garden City Park, Town of North Hempstead, Nassau County, New York (see Figure 1). A fabric-cutting mill operated at the Fulton Property from approximately January 1, 1965 through approximately December 31, 1974, and these operations included dry-cleaning of fabric with tetrachloroethylene (PCE). Currently, the Fulton Property is occupied by a business support company.

Approximately 208,000 people live within three miles of the Fulton Property. There are about 20,000 people living within a mile of the Fulton Property. Residents within the area obtain their drinking water from public supply wells. The vicinity of the Fulton Property is industrial but residential areas are immediately adjacent to the industrial area.

The Site is situated in the outwash plain on Long Island, New York. Approximately 500 feet of interbedded sands and limited clay lenses overlay Precambrian bedrock. There are three aquifers that exist beneath the Site, two of which are affected. The Upper Glacial aquifer is the surficial unit which overlies the Magothy aquifer. The Magothy is the primary source for public water in the area. No impeding clays were observed between the Upper Glacial and Magothy aquifers within the area investigated during the Operable Unit 1 (OU1) Remedial Investigation (RI), as described below.

SITE HISTORY AND ENFORCEMENT ACTIVITIES

Beginning in 1986, numerous investigations were conducted by the Nassau County Departments of Health and Public Works to identify the source(s) of VOCs impacting public supply wells in Nassau County located downgradient of the GCPIA. Based on the results of these investigations, the New York State Department of Environmental Conservation (NYSDEC) placed the Fulton Property on the Registry of Inactive Hazardous Waste Disposal Sites.

On March 6, 1998, the EPA placed the Site on the National Priorities List (NPL) of sites under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). At that time, NYSDEC was the lead regulatory agency overseeing the implementation of the RI and Feasibility Study (FS), and an Interim Remedial Measure (IRM) that is described below.

Genesco Inc., a potentially responsible party (PRP) for the Site, conducted the IRM from August 1998 to December 2001 to remove contaminants from a drywell on the Fulton Property in order to address a significant source of contamination that was impacting indoor air at the Fulton Property and the groundwater. During the IRM, contaminated soils were excavated, after which a soil vapor extraction (SVE) system was installed to address residual soil contamination at the bottom of the drywell. The system was operated until NYSDEC Technical and Administrative Guidance Memorandum (TAGM) soil cleanup levels were achieved. Over 10,000 pounds of PCE were estimated to have been removed from the source area during the operation of the SVE system. The completion of the IRM was approved by NYSDEC and the dismantling of the SVE system was authorized on January 2, 2002.

Following the IRM, Genesco installed a sub-slab ventilation system under the Fulton Property to protect occupants from exposure to VOC vapors that may enter the Fulton Property from beneath the building. This system remains in operation to protect the indoor air quality.

In 1999, under an Administrative Order with NYSDEC, Genesco contracted with an environmental consulting firm, Environmental Resources Management (ERM), to conduct an RI/FS under state law. Between March 2000 and May 2003, 20 monitoring wells were installed and sampled in the RI/FS study area. The RI Report was approved by NYSDEC in November 2005. An FS Report was approved by NYSDEC on February 15, 2007. The EPA prepared an addendum to

the FS Report in February 2007, and became the lead agency for the Site at that time.

A Proposed Plan for OU1 at the Site was released by the EPA for public comment on February 23, 2007, and the public comment period ran from that date through March 31, 2007. The EPA selected the OU1 interim remedy in the 2007 Record of Decision (ROD). The selected remedy included the following elements:

- In-Situ Chemical Oxidation (ISCO) treatment of source contamination in groundwater at and near 150 Fulton Avenue;
- Construction and operation of a groundwater extraction and treatment system midway along the spine of the PCE-dominant portion of the contaminant plume;
- Evaluation of the Village of Garden City's (Village's) 2007 upgrade to treatment systems on wells 13 and 14 to determine whether the upgrade was fully protective;
- Investigation and remediation, if necessary, of vapor intrusion into structures within the vicinity of the Fulton Property; and
- Institutional controls to restrict future use of groundwater at the Site.

On September 10, 2009, the United States filed for public comment, United States v. Genesco Inc., No. CV–09–3917 (E.D.N.Y.), a consent judgment in which Genesco agreed to implement the interim OU1 remedy selected in the 2007 ROD. The consent judgment has not been approved by the Court. Pursuant to the consent judgment, however, Genesco began the remedial design of that remedy after the consent judgment was filed. The Village, which had filed its own lawsuit against Genesco and Gordon Atlantic Corporation, raised concerns about the settlement in comments filed with the court, and the consent judgment remains filed with the court but not entered. Discussions between and among the EPA, Genesco, and the Village have been ongoing since then.

In March of 2012, while the remedial design was underway, the Village and Genesco proposed modifications to the 2007 ROD that would, among other things, eliminate the interim groundwater extraction and treatment system while ensuring the continued operation of the wellhead treatment systems on Village water supply wells 13 and 14.

COMMUNITY PARTICIPATION

The Proposed Plan for this amended remedy and supporting documentation for the Site were made available to the public on April 24, 2015, at the EPA Region 2 Administrative Record File Room in New York, NY, the Garden City Public Library in Garden City; and at the Shelter Rock Public Library in Albertson, New York. The EPA issued a public notice in the Garden City News on April 24, 2015, which informed the public of the duration of the public comment period, the date of the public meeting, and the availability of the Proposed Plan and the Administrative Record file. The public comment period was held from April 24, 2015, through May 26, 2015. A public meeting was held on May 12, 2015, at the Garden City Village Hall, 351 Stewart Avenue, in Garden City, New York. The purpose of the meeting was to inform interested citizens and local officials about the Superfund process, to discuss and receive comments on the Proposed Plan, and to respond to questions from the public and other interested parties. Responses to comments and questions received at the public meeting are included in the Responsiveness Summary, which is part of this Record of Decision (Appendix V). The EPA did not receive any public comments on the Proposed Plan other than the comments presented at the public meeting.

SCOPE AND ROLE OF RESPONSE ACTION

This ROD Amendment addresses the remediation of a portion of the contaminated groundwater at the Site as an interim action. Section 300.5 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. Section 300.5, defines an operable unit as a discrete action that is an incremental step toward comprehensively addressing a site's problems. A discrete portion of a remedial response eliminates or mitigates a release, a threat of release, or pathway of exposure. Cleanup of a site can be divided into number of OUs, depending on the complexity of the problems associated with the Site. The EPA also uses interim actions to address areas or contaminated media, such as groundwater, that ultimately may be included in the final record of decision for a site. Interim actions are used, for example, to institute temporary measures to stabilize a site or operable unit and/or prevent further migration of contaminants or further environmental degradation.

The Fulton Avenue Site is being addressed by the EPA in two operable units. This ROD Amendment selects an interim action to address protection of the public water supply and incidentally, migration of portions of the groundwater at the Site that are

primarily contaminated with PCE. The EPA has designated this action as OU1 of the Site remediation. The Fulton Avenue Site also includes TCE contamination in groundwater surrounding the PCE-dominant portion of the groundwater contamination being addressed in OU1. The EPA currently is investigating the TCE contamination as well as possible sources of PCE and TCE as part of OU2 for the Site. The EPA currently is performing an RI/FS for OU2, and expects to issue a ROD for OU2 that will constitute the final groundwater remedy for the Site and that will serve as a final decision for OU1. This OU1 interim remedial action will assure the provision of a safe drinking water supply from Village potable supply wells 13 and 14 while the Site-wide groundwater investigation continues.

This amended remedy modifies the scope and role of the response action identified in the 2007 ROD, which included a groundwater extraction and treatment system that was intended to work towards restoring the groundwater to its beneficial use. (See 2007 ROD at p.4.) The EPA concluded that eliminating the groundwater extraction and treatment system from the OU1 remedy would be appropriate at this time because PCE levels in groundwater reaching the intakes of wells 13 and 14, which had been increasing at the time of the 2007 ROD, instead have been declining since the summer of 2007. The lower PCE levels in groundwater suggest that the extraction well system contemplated in the 2007 ROD is not needed to help prevent more highly elevated levels of contamination from reaching wells 13 and 14, because such high levels of contamination are unlikely to be present in the future. The existing treatment systems at water supply wells 13 and 14 have been and are expected to continue to effectively provide a safe drinking water supply. The attenuating nature of the PCE-dominant portion of the groundwater plume indicates that the source of the PCE in the PCE-dominant portion of the plume may be depleting and that the highest levels of contamination may have already passed through the well head treatment systems at supply wells 13 and 14. A final decision regarding the groundwater contamination will be made following the EPA’s completion of additional investigations at the Site.

In addition, remedial design sampling conducted by Genesco’s contractor in the area around the Fulton Property did not identify PCE source material in the shallow aquifer in the immediate vicinity of the former drywell into which the EPA believes PCE was historically disposed. This ROD Amendment therefore does not call for ISCO to be applied to the shallow aquifer at that location. The EPA has, however, identified

fluctuating high levels of PCE (as high as approximately 50,000 parts per billion (ppb) in 1986) in groundwater in shallow monitoring well GCP-01. This monitoring well is located on Atlantic Avenue approximately 400 feet southwest of the Fulton Property and is used to monitor the shallow aquifer. While concentrations have fluctuated significantly over the sampling period, concentrations are generally declining. A sample at GCP-01 collected in March 2015 contained 210 ppb PCE. High PCE levels detected in GCP-01 suggest the existence of PCE source material in that vicinity. The EPA expects to continue the investigation of potential source material.

The 2007 ROD noted that the OU1 portion of the contamination plume would be restored to its beneficial use only when the TCE-dominant contamination is addressed in OU2. Since the nature and extent of the contamination present in the OU1 and OU2 portions of the plume – including sources of TCE - have not yet been fully characterized, the EPA does not have sufficient information at this time to determine whether the aquifer at the Site can be fully restored. Accordingly, aquifer restoration is not an objective of the amended OU1 interim remedy. The EPA will conduct additional investigations as part of OU2. Currently, groundwater restoration is one of the EPA's goals for the final Site remedy. The OU1 interim remedy will neither be inconsistent with, nor preclude, implementation of a final remedy for the Site.

SITE CHARACTERISTICS

Physical Characteristics

The Site is relatively flat, with local relief of approximately 12 feet over a distance of 2,600 feet. Nearer to the Fulton Property, the area is slightly sloping with local relief of approximately five feet. The soil at the Site is classified as urban land (defined as areas where at least 88% of the surface is covered with asphalt, concrete, or other paving material). The land uses within the Site are a mix of residential, commercial, and industrial. The GCPIA is an industrial/commercial area and the area south of the Long Island Railroad tracks is largely residential. Soils underlying the Site are classified as a sandy loam. Runoff from the streets goes into storm drains. The Garden City Country Club lies south of the residential area. Its manicured grassland surrounds a pond which accepts runoff from the golf course.

Geology

The Site is located in western Nassau County, Long Island. Long Island is situated within the Atlantic Coastal Plain physiographic province, which is underlain by a wedge of unconsolidated sediments that thickens and dips to the southeast toward the Atlantic Ocean. The unconsolidated deposits, which underlie the Site, range in age from late Cretaceous (65 million years ago) to recent.

The geology in the Site area is composed of approximately 500 feet of unconsolidated materials, mostly siliceous sands with interbedded limited layers of clay or lignites (fossilized organic material). These unconsolidated materials overlay Precambrian crystallized bedrock.

Three aquifers are present beneath the Site: the Upper Glacial Aquifer, the Magothy Aquifer and the Lloyd Sand Member Aquifer. These aquifers are designated as Long Island's sole-source aquifer system, with NYSDEC Class GA designations as sources of potable water supply. For the purpose of this ROD Amendment, only the Upper Glacial aquifer and the Magothy aquifer will be discussed because those two aquifers are the primary sources of potable water supply within Nassau County.

The depositional environments of the aquifer system create great variations (heterogeneity) in the hydrogeology of the Site. These variations in the aquifer matrix are shown as interbedding of lenses and layers of materials ranging in size from clays to medium sands to gravels (coarser-grained deposits), which cause significant variations in the hydraulic conductivity between strata and create preferential groundwater flow pathways within this aquifer system. The coarser-grained deposits that represent more transmissive strata presumably are responsible for preferential transport of groundwater and any dissolved contamination.

Upper Glacial Aquifer

The Pleistocene deposits contain the water table aquifer in this region of Long Island, which is referred to as the Upper Glacial aquifer. Within the Site, depth to water ranges between 45 to 60 feet below land surface, and the saturated thickness of the Upper Glacial aquifer can range anywhere between 40 and 85 feet. The published hydraulic conductivity values for the Upper Glacial aquifer range between 270 to 335 feet/day. Values collected during the RI show that a more accurate horizontal

hydraulic conductivity value for the Upper Glacial aquifer in this region of Nassau County is 380 feet/day. The average hydraulic gradient in the Upper Glacial aquifer within this area of Nassau County is 0.0017 feet/foot. The Upper Glacial aquifer is in hydraulic communication with, and provides groundwater recharge to, the underlying Magothy aquifer.

Magothy Aquifer

The Magothy formation is fully saturated. The hydraulic conductivity value for the Magothy aquifer in this region of Nassau County is 100 feet/day. The average hydraulic gradient in the Magothy aquifer within this area of Nassau County is 0.0019 feet/foot.

The Magothy aquifer receives groundwater recharge from the overlying Upper Glacial aquifer. The Fulton Property and the currently known extent of the OU1 portion of the groundwater contaminant plume are located within an area designated as the deep flow recharge zone of the Magothy aquifer.

Nature and Extent of Contamination

Site investigations were performed prior to and subsequent to the 2007 ROD. Investigations performed prior to the 2007 ROD are briefly summarized below and described in more detail in the 2007 RI report and the 2007 ROD. The information provided below focuses on results of investigations performed after the 2007 ROD.

Soil

NYSDEC investigations in the 1990s identified a drywell immediately adjacent to the building at the Fulton Property as the primary source of PCE-dominant contamination migrating downgradient from the Fulton Property. This drywell was connected to a pipe that received dry cleaning waste from inside the building. The primary contaminant identified in drywell sediments, adjacent soil, and shallow groundwater beneath the drywell was PCE. TCE was also detected in soils on the Fulton Property at lower levels. Under an administrative consent order with NYSDEC, Genesco conducted the IRM from August 1998 to December 2001 to remove contaminants from the original drywell on the Fulton Property in order to prevent further contaminant migration into the aquifer and into the indoor air at the facility. Following the excavation of contaminated soils from the bottom of the drywell, Genesco installed a Soil Vapor

Extraction (SVE) system to address residual soil contamination. The SVE system operated until the soil vapor contaminant concentrations met NYSDEC TAGMs. Over 10,000 pounds of PCE were removed from the source area during the operation of the SVE system. Following this action, Genesco installed a sub-slab depressurization system under the building at the Fulton Property to provide additional protection of the occupants from exposure to the contamination. This system remains in operation.

In 2011 and 2013, Genesco's consultant, ERM, conducted sampling to identify PCE source materials in groundwater in the vicinity of the Fulton Property, including in the area near well GCP-01, that would be amenable to treatment with the ISCO that was selected as part of the 2007 ROD. Source material was not found in the shallow (Upper Glacial) aquifer in that area. The EPA intends to investigate the potential existence of possible source material in the deeper Magothy aquifer below the GCPIA (in the vicinity of GCP-01) as part of future investigations at the Site. The investigation of whether a deeper source of Site-related PCE contamination is present in the Magothy aquifer is beyond the scope of the interim action selected in this ROD Amendment.

Genesco conducted additional investigatory work in order to identify a source or sources responsible for the high PCE concentrations seen in monitoring well GCP-01. The investigation, however, did not identify sources of that contamination. The EPA is continuing to investigate additional areas for possible sources that may need to be addressed.

Groundwater

The OU1 groundwater sampling program prior to the 2007 ROD included sampling of 20 groundwater monitoring wells located at the Site and analysis of samples for organic and inorganic compounds. The highest PCE concentration observed in monitoring well (MW) cluster 21 prior to the ROD was 3,330 ppb, detected in MW 21C in 2006. The MW 21 cluster is located approximately 1,200 feet upgradient of Village supply wells 13 and 14. As part of this investigation, the EPA concluded that high levels of TCE observed predominantly in the western portion of the study area were not from the same source as the PCE in the PCE-dominant portion of the observed plume. The EPA decided that a separate investigation was necessary to address this TCE-dominant portion of the plume, leading to the designation of OU2 for the Site.

Since the 2007 ROD, sampling of the monitoring wells in the OU1 portion of the plume, as well as data gathered by the Village during its operation of Village supply wells 13 and 14, show that concentrations of PCE have steadily diminished in the OU1 portion of the contaminant plume. The Village collects samples on a monthly basis.

Prior sampling work included samples collected by Genesco in November 2011, by the EPA in June 2013, by Genesco in March 2015, and by Genesco again in May 2015.

PCE concentrations in MW 21C (located on Wickham Avenue near Stewart Avenue) have trended downward from the pre-ROD peak of 3,330 ppb in 2006 to 6.1 ppb PCE detected by the EPA in June 2013. More recently, sampling conducted by Genesco in March 2015 identified 1.5 ppb PCE in MW 21B and 1.3 ppb PCE in MW 21C, which are the lowest PCE levels detected in those well intervals since MW 21 was constructed in 2001. Samples collected in May 2015 identified 1,470 ppb PCE in MW 21B and 318 ppb PCE in MW 21C. Although the May 2015 analytical results are higher than the March 2015 results, they are not inconsistent with the overall downward trend in contamination observed in the OU1 area.

TCE concentrations in MW 21B and MW 21C declined from 80.7 ppb in 2011 to 1.1 ppb in 2015 in MW 21B, and from 48.4 ppb in 2011 to 0.0 ppb (non-detect) in 2015 in MW 21C. TCE samples collected in May 2015 identified 154 ppb in MW 21B and 18.8 ppb in MW 21C.

A downward trend has also been observed in Village supply wells 13 and 14, where the concentration of PCE in groundwater entering those wells decreased from a high of 1,020 ppb in June 2007 in well 13 to a concentration of 170 ppb detected in well 14 in both May and November, 2014. Samples collected in April 2015 detected 436 ppb PCE in groundwater entering well 13, and 250 ppb PCE in groundwater entering well 14. It should be noted that there are fluctuations in the PCE levels entering wells 13 and 14, though an overall downward trend is evident since 2007, when PCE concentrations in those wells peaked.

In MW 15A, located approximately midway between MW 21 and the Fulton Property, PCE levels have declined from 1,120 ppb PCE in November 2011 to 399 ppb in May 2015.

Sampling conducted since 2004 at MW 26, located generally between Village supply wells 13 and 14 and Franklin Square Water

District wells 1 and 2, has sporadically shown low levels of PCE-dominant contamination. The majority of the contamination in MW 26 generally has been TCE. When compared to 2011 analytical results, the May 2015 samples collected from MW 26 show higher PCE concentrations relative to TCE concentrations in several of the MW 26 screening levels (MW 26B at 271 feet, MW26C at 325 feet, MW 26D at 350.5 feet, 26E at 377 feet and 26F at 410.5 feet), with a maximum 2015 PCE concentration of 30.9 ppb detected in MW 26F. PCE-dominant contamination has not been detected in MW 27, located south of MW 26 and between the Village's supply wells 13 and 14 and the Franklin Square supply wells, nor has PCE been detected in Franklin Square supply wells 1 and 2. These data suggest that Village supply wells 13 and 14 are helping to reduce the migration of the OU1 portion of the groundwater plume (see Table 2 in Appendix II).

All data collected prior to and since the 2007 ROD and any future data will be utilized in the evaluation of a final groundwater remedy for the Site.

Contaminant Fate and Transport

The greatest potential for transport of VOCs at the Site is via groundwater migration. The PCE-dominant part of the plume was found to extend approximately 6,500 feet downgradient of the Fulton Property. The average width of the PCE-dominant part of the plume was estimated in the 2007 ROD to be about 1,000 feet. PCE in the OU1 portion of the contamination plume extends to a depth of approximately 420 feet, exhibiting an average thickness of approximately 250 feet.

CURRENT AND POTENTIAL FUTURE SITE AND RESOURCE USES

The land uses within the Site are a mix of residential, commercial, and industrial. All groundwater in New York State is classified as GA, which is groundwater suitable as a source of drinking water. Groundwater in the immediate vicinity of the Site is currently used as a source of drinking water. Village of Garden City supply wells 13 and 14 are approximately 1 mile south of the Fulton Property. Public water supply wells of the Nassau County Water Authority are located approximately one mile southwest of the Fulton Property and Franklin Square Potable Supply Wells 1 and 2 are approximately 1/2 mile south of Village of Garden City supply wells 13 and 14.

SUMMARY OF SITE RISKS

As part of the OU1 remedial investigation, a baseline risk assessment was conducted in 2005 to estimate the current and future effects of contaminants on human health and the environment. A baseline risk assessment is an analysis of the potential adverse human health and ecological effects caused by hazardous substance releases from a site in the absence of any actions to control or mitigate such releases, under current and anticipated future land and resource use. The baseline risk assessment includes a human health risk assessment (HHRA) and an ecological risk assessment. It provides the basis for taking action and identifies the contaminants and exposure pathways that need to be addressed by the remedial action.

Since the original baseline HHRA for the Site was finalized, toxicity values for both risk driving chemicals (TCE and PCE), along with several exposure parameters have been updated. A Supplemental Risk Evaluation, dated August XX, 2015, was conducted by EPA to determine if the conclusions of the 2005 HHRA remained valid. The memorandum looked at the most conservative receptor evaluated in the original HHRA, the child and adult resident, and recalculated the resultant cancer and non-cancer risks for the two risk driving chemicals using the originally derived exposure point concentrations(EPCs)and currently available toxicity and exposure information. Based on the results of this evaluation the memorandum determined that the conclusions of the 2005 HHRA have not changed substantially and the need to take an action at the Site remains valid.

This section of the ROD summarizes the results of the baseline risk assessment as supplemented by EPA's 2015 Risk Evaluation Memo for the Site. The comprehensive baseline HHRA document along with EPA's 2015 memorandum documenting the supplemental risk evaluation are available in the Administrative Record for the Site.

Human Health Risk Assessment

The HHRA for the Site focused on two areas, the Fulton Property, and the residential and commercial/industrial properties within the RI study area.

A four-step process is used for assessing Site-related human health risks for a reasonable maximum exposure scenario:

Hazard Identification – uses the analytical data collected to identify the contaminants of potential concern at the Site for each medium, with consideration of a number of factors explained below;

Exposure Assessment - estimates the magnitude of actual and/or potential human exposures, the frequency and duration of these exposures, and the pathways (e.g., ingesting contaminated well-water) by which humans are potentially exposed;

Toxicity Assessment - determines the types of adverse health effects associated with chemical exposures, and the relationship between magnitude of exposure (dose) and severity of adverse effects (response); and

Risk Characterization - summarizes and combines outputs of the exposure and toxicity assessments to provide a quantitative assessment of site-related risks. The risk characterization also identifies contamination with concentrations which exceed acceptable levels, defined by the NCP as an excess lifetime cancer risk greater than 1 x 10^{-6} – 1 x 10^{-4} or a Hazard Index greater than 1; contaminants at these concentrations are considered contaminants of concern (COCs) and are typically those that will require remediation at a site. Also included in this section is a discussion of the uncertainties associated with these risks.

Hazard Identification

In this step, the contaminants of potential concern (COPCs) at the Site in various media are identified based on such factors such as toxicity, frequency of detection, and fate and transport of the contaminants in the environment. In accordance with EPA guidance, a screening assessment is performed during which all chemicals are compared to EPA's risk-based screening levels (RSLs). The chemicals that are detected above the media- and chemical-specific RSLs are retained as COPCs and evaluated quantitatively in the remainder of the HHRA. As mentioned in the previous paragraph, the *Risk Characterization* section of the risk assessment provides a quantitative assessment of site-related risks. Based on the results of the *Risk Characterization* section, COPCs that exceed EPA's threshold values of 10^{-4} (for cancer risks) or a Hazard Index (HI) greater than 1 (for non-cancer health hazards) are considered COCs.

A comprehensive list of all COPCs can be found in the 2005 HHRA which is available in the Administrative Record. EPA has identified PCE and TCE as the COCs for OU1. Only the COCs, or those chemicals requiring remediation at the Site, are listed in Appendix II, Table 3.

Exposure Assessment

Consistent with Superfund policy and guidance the HHRA is a baseline human health risk assessment and therefore assumes no remediation or institutional controls are in place to control or mitigate exposure to hazardous substance releases under current and anticipated future land uses. Cancer risks and non-cancer hazard indices were calculated based on an estimate of the reasonable maximum exposure (RME) expected to occur under current and future conditions at the Site.

The *Exposure Assessment* step evaluated the current and future land use, the potential receptor populations, and the potential routes of exposure. These are summarized in Appendix II, Table 4. The current land use of the Fulton Property is commercial/industrial, and it is not expected that the land use will change in the foreseeable future. The surrounding properties are also expected to retain their current land use, which is commercial/industrial and residential. The area is served by municipal water and it is not likely that the groundwater underlying the Fulton Property or the surrounding commercial/industrial or residential areas will be used privately by individuals for potable purposes in the foreseeable future; however, since the groundwater downgradient of the Fulton Property is used for municipal water supplies and the regional groundwater is designated as a drinking water source, exposure to groundwater through potable uses was evaluated. The other media that were evaluated included the potential for vapor intrusion into buildings and the potential for future contamination in the irrigation holding pond at the nearby golf course.

Exposure pathways were identified for each population potentially exposed to contaminated groundwater associated with the Site. Exposure pathways assessed in the 2005 HHRA for groundwater included: ingestion of, dermal contact with and inhalation of vapors released during showering and bathing by current and future residents (child and adult); inhalation of indoor air by current and future residents (child and adult), along with a current/future commercial worker’s exposure to indoor air on and off the Fulton Property; ingestion of

groundwater by a current/future worker at the Site but off the Fulton Property; and inhalation of volatiles released from the nearby irrigation holding pond by future golf course employees/landscapers.

Although the original HHRA quantitatively evaluated all the receptors summarized in Table 4 of Appendix II, EPA's Supplemental Risk Evaluation Memorandum looked at the most conservative receptor only (i.e., a child and adult resident). Consistent with current risk assessment practices, the 2015 Memorandum calculated cancer risks for the resident based on the integrated child-adult residential exposure scenario which considers exposure to a chemical over a lifetime. This is done by adding the resultant cancer risks of a child to that of an adult.

As previously stated, the summary of all exposure pathways evaluated in the original HHRA can be found in Appendix II, Table 4. Typically, exposures are evaluated using a statistical estimate of the exposure point concentration (EPC), which is usually an upper-bound estimate of the average concentration for each contaminant, but in some cases may be the maximum detected concentration. The EPCs for PCE and TCE in tap water and at the shower head can be found in Appendix II, Table 3, while a comprehensive list of the exposure point concentrations for all COPCs identified in the *Hazard Identification* step can be found in the original 2005 HHRA.

Toxicity Assessment

In this step, the types of adverse health effects associated with contaminant exposures and the relationship between magnitude of exposure and severity of adverse health effects are determined. Potential health effects are contaminant-specific and may include the risk of developing cancer over a lifetime, or other non-cancer health effects such as changes in the normal function of organs within the body (*e.g.*, changes in the effectiveness of the immune system). Some contaminants are capable of causing both cancer and non-cancer health effects.

Under current EPA guidelines, the likelihood of carcinogenic risks and non-cancer hazards due to exposure to site chemicals are considered separately. Consistent with current EPA policy, it was assumed that the toxic effects of the Site-related chemicals would be additive. Thus, cancer and non-cancer risks associated with exposures to individual COPCs were summed to indicate the potential risks and hazards associated with

mixtures of potential carcinogens and non-carcinogens, respectively.

Toxicity data for the HHRA documents were provided by the Integrated Risk Information System (IRIS) database, the Provisional Peer Reviewed Toxicity Database (PPRTV), or another source considered an appropriate reference for toxicity values based on EPA guidance. The Supplemental Risk Evaluation for the Site used currently available IRIS toxicity values for TCE and PCE when recalculating the estimated risks and hazards to the residential receptor. The toxicity information used in the supplemental risk evaluation is presented in Appendix II, Table 5 (Cancer Toxicity Data Summary) and Appendix II, Table 6 (Non-cancer Toxicity Data Summary). Specific details of toxicity information and exposure assumptions used for risk quantification of all other receptors and COPCs considered in the original HHRA are available in the Administrative record.

Risk Characterization

This step summarized and combined outputs of the exposure and toxicity assessments to provide a quantitative assessment of Site risks. Exposures were evaluated based on the potential risk of developing cancer and the potential for non-cancer health hazards.

Non-carcinogenic risks were assessed using a hazard index (HI) approach, based on a comparison of expected contaminant intakes and benchmark comparison levels of intake (reference doses, reference concentrations). Reference doses (RfDs) and reference concentrations (RfCs) are estimates of daily exposure levels for humans (including sensitive individuals) which are thought to be safe over a lifetime of exposure. The estimated intake of chemicals identified in environmental media (*e.g.*, the amount of a chemical ingested from contaminated drinking water) is compared to the RfD or the RfC to derive the hazard quotient (HQ) for the contaminant in the particular medium. The HI is obtained by adding the hazard quotients for all compounds within a particular medium that impacts a particular receptor population.

The HQ for oral and dermal exposures was calculated as shown below. The HQ for inhalation exposures was calculated using a similar model that incorporates the RfC, rather than the RfD.

HQ = Intake/RfD

Where: HQ = hazard quotient
Intake = estimated intake for a chemical (mg/kg-day)
RfD = reference dose (mg/kg-day)

The intake and the RfD will represent the same exposure period (i.e., chronic, subchronic, or acute).

The key concept for a noncancer HI is that a “threshold level” (measured as an HI of less than 1) exists below which non-cancer health effects are not expected to occur.

As previously stated, the HI is calculated by summing the HQs for likely exposure scenarios for all chemicals with respect to a specific population. An HI greater than 1 indicates that the potential exists for non-carcinogenic health effects to occur as a result of site-related exposures, with the potential for health effects increasing as the HI increases. When the HI calculated for all chemicals for a specific population exceeds 1, separate HI values are then calculated for those chemicals which are known to act on the same target organ. These discrete HI values are then compared to the acceptable limit of 1 to evaluate the potential for non-cancer health effects on a specific target organ. The HI provides a useful reference point for gauging the potential significance of multiple contaminant exposures within a single medium or across media. A summary of the non-carcinogenic risks associated with PCE and TCE for each exposure pathway is contained in Appendix II, Table 8; however, as per current EPA guidance, only the exposure pathways with non-cancer estimates exceeding the threshold value of 1 are included in the table. The table reflects the residential non-cancer risks as calculated in EPA’s 2015 Supplemental Risk Evaluation Memorandum. For the commercial/industrial worker the non-cancer estimates calculated in the original HHRA document were used.

As summarized in Appendix II, Table 8, the HI totals for non-cancer effects for the current/future child resident, adult resident and an adult commercial worker present at the Site but working off the Fulton Property were 34.7, 29.8 and 2.4, respectively. For the child resident, the noncancer hazard of 34.7 was driven by ingestion, dermal contact and inhalation of PCE in groundwater, along with ingestion and inhalation of TCE contaminated groundwater. The adult non-cancer hazard index total of 29.8 was driven by ingestion and inhalation of PCE and TCE in groundwater. The non-cancer risks for the off-Fulton Property

commercial worker were driven by ingestion of TCE-contaminated groundwater.

For carcinogens, risks are generally expressed as the incremental probability of an individual developing cancer over a lifetime as a result of exposure to a carcinogen under the conditions described in the *Exposure Assessment*, using the cancer slope factor (SF) for oral and dermal exposures and the inhalation unit risk (IUR) for inhalation exposures. Excess lifetime cancer risk for oral and dermal exposures is calculated from the following equation, while the equation for inhalation exposures uses the IUR, rather than the SF:

Risk = LADD x SF

Where: Risk = a unitless probability (1×10^{-6}) of an individual developing cancer
LADD = lifetime average daily dose averaged over 70 years (mg/kg-day)
SF = cancer slope factor, expressed as 1/(mg/kg-day)

These risks are probabilities that are usually expressed in scientific notation (such as 1×10^{-4} or 1E-04). An excess lifetime cancer risk of 1×10^{-4} indicates that one additional incidence of cancer may occur in a population of 10,000 people who are exposed under the conditions identified in the *Exposure Assessment*. As stated in the NCP, the acceptable cancer risk range for site-related exposure is 10^{-6} to 10^{-4}, with 10^{-6} being the point of departure.

As summarized in Table 7 of Appendix II, the estimated cancer risks for the current/future aggregate child-adult resident and off-Fulton Property commercial worker exceeded the EPA's target risk range of 10^{-4} to 10^{-6} (E-04 to E-06). The estimated cancer risk for the child-adult resident exposed to groundwater was 1.8×10^{-4} with the major risk driving chemicals identified as TCE and PCE. For the off-Fulton Property commercial worker, the estimated cancer risk were equal to 6.8×10^{-4} and was driven by ingestion of PCE-contaminated groundwater.

In summary, TCE and PCE were identified as the non-cancer and cancer risk driving chemicals present in Site groundwater. The quantitative estimate of non-cancer hazards and cancer risks for all receptors and all COPCs can be found in the baseline HHRA document. Updated risk estimates for the residential child and adult receptors are summarized in the 2015 Memorandum entitled

"Supplemental Risk Evaluation for the Fulton Avenue Superfund Site". The response action selected in this ROD Amendment is necessary to protect the public health or welfare of the environment from actual or threatened releases of contaminants into the environment.

Uncertainties

The procedures and inputs used to assess risks in this evaluation, as in all such assessments, are subject to a wide variety of uncertainties. In general, the main sources of uncertainty include:

- environmental chemistry sampling and analysis
- environmental parameter measurement
- fate and transport modeling
- exposure parameter estimation
- toxicological data

Uncertainty in environmental sampling arises in part from the potentially uneven distribution of chemicals in the media sampled. Consequently, there is uncertainty as to the actual levels present. Environmental chemistry-analysis error can stem from several sources, including the errors inherent in the analytical methods and characteristics of the matrix being sampled.

Uncertainties in the exposure assessment are related to estimates of how often an individual would actually come in contact with the chemicals of concern, the period of time over which such exposure would occur, and in the models used to estimate the concentrations of the chemicals of concern at the point of exposure.

Uncertainties in toxicological data occur in extrapolating both from animals to humans and from high to low doses of exposure, as well as from the difficulties in assessing the toxicity of a mixture of chemicals. These uncertainties are addressed by making conservative assumptions concerning risk and exposure parameters throughout the assessment. As a result, the risk assessment provides upper-bound estimates of the risks to populations near the Site, and is highly unlikely to underestimate actual risks related to the Site.

Noteworthy uncertainties in the HHRA for the Site deal with the fact that the original risk assessment was conducted in 2005. Since the HHRA was finalized, toxicity values for both risk

driving chemicals (TCE and PCE), along with several exposure parameters have been updated. To account for the changes in toxicity data and exposure assumptions EPA conducted a supplemental risk evaluation for the residential receptor at the Site. All other receptors evaluated in the original 2005 HHRA are considered to be less conservative receptors than the resident and were not reevaluated. Based on the results of this evaluation, it was determined that the conclusions of the 2005 HHRA have not changed substantially and there is a continuing need for a response action at the Site.

More specific information concerning the human health risks at the Site is presented in the HHRA and in the EPA's Supplemental Risk Evaluation, both of which are available in the Administrative Record.

Ecological Risk Assessment

The potential risk to ecological receptors was evaluated by ERM in the baseline risk assessment. For there to be an exposure, there must be a pathway through which a receptor (e.g., animal) comes into contact with one or more of the COCs. Without a complete pathway or receptor, there is no exposure and hence, no risk.

Based on a review of existing data, there are no potential exposure pathways for ecological receptors at the Site. As noted above, the Fulton Property itself is less than 1 acre in size and is located in the GCPIA within a highly developed area. The entire Fulton Property is paved or covered with buildings. The depth to groundwater at the Site (the medium of concern) is approximately 50 feet and groundwater is unlikely to affect any surface water bodies.

REMEDIAL ACTION OBJECTIVES

Remedial action objectives (RAOs) are specific goals to protect human health and the environment. These objectives are based on available information and standards such as applicable or relevant and appropriate requirements (ARARs) for drinking water and groundwater, Site-specific risk-based levels, and the reasonably anticipated future land use for the Site (*e.g.*, commercial/industrial or residential).

The following RAOs were established for OU1 in the 2007 ROD:

- Reduce contaminant levels in the drinking water aquifer to ARARs.

- Prevent further migration of contaminated groundwater.

The selected remedy in this ROD Amendment is intended to prevent exposure to contaminated groundwater and to help reduce migration of contaminated groundwater in the aquifer, and is not inconsistent with the RAOs identified in the 2007 ROD.

The response action selected in the 2007 ROD, which included a groundwater extraction and treatment system, was intended to work towards restoring the groundwater to its beneficial use. (See 2007 ROD at page 4). The ROD (page 23) indicated that the groundwater extraction system was expected to "more expeditiously meet chemical-specific ARARs (e.g., MCLs) for the groundwater." Data collected since 2007, however, show that PCE levels are declining in the OU1 portion of the groundwater plume, and that the treatment systems currently installed on wells 13 and 14 are effectively removing PCE and other VOCs from groundwater entering the wells. Further, modeling analyses conducted in 2012 raised uncertainties as to whether the groundwater extraction system would significantly shorten the time to achieve the MCL for PCE in groundwater.

The 2007 ROD also called for the application of ISCO technology, in which an oxidant such as potassium permanganate would be injected underground near the former drywell at the Fulton Property, which is a major source of the OU1 PCE groundwater contamination. The purpose of the ISCO injections was to convert organic contamination into nonhazardous compounds, thereby accelerating restoration of the groundwater to the MCLs. Investigations performed during the OU1 remedial design, however, did not identify the location of any PCE source material in the shallow aquifer in the immediate vicinity of the Fulton Property. Therefore, ISCO will not be applied to the shallow aquifer at that location. The EPA will continue to investigate additional areas for possible source material that may need to be addressed (by ISCO or another remedial approach), including source(s) of elevated PCE observed in nearby monitoring well GCP-01 located southwest and downgradient of the Fulton Property.

In the 2007 ROD, the EPA indicated that the OU1 portion of the contamination plume would be restored to its beneficial use when the TCE-dominant contamination is addressed in OU2. Because the nature and extent of the contamination present in the OU1 and

OU2 portions of the plume – including sources of TCE - has not yet been fully identified, the EPA does not have sufficient information at this time to determine whether the aquifer at the Site can be fully restored, and will conduct additional investigations as part of OU2 prior to making a Site-wide determination regarding restoration of the groundwater.

In view of the above, in this ROD Amendment the EPA has established RAOs for this interim remedy as follows:

- Minimize and/or eliminate the potential for future human exposure to Site contaminants via contact with contaminated drinking water.

- Help reduce migration of contaminated groundwater.

The proposed change to the 2007 ROD is not inconsistent with the RAOs identified in the 2007 ROD, because the continued pumping and treatment of Village wells 13 and 14 will ensure a potable water supply, and this pumping and treatment provides the incidental benefit of helping to reduce migration of contaminated groundwater. While the proposed modification also will have the incidental benefit of reducing contaminant levels in groundwater, the primary purposes of this proposed modification are to prevent exposure to contaminated groundwater and to help reduce migration of contaminated groundwater.

DESCRIPTION OF ALTERNATIVES

CERCLA Section 121(b)(1), 42 U.S.C. § 9621(b)(1), requires remedial actions to be protective of human health and the environment, cost-effective, and utilize permanent solutions and alternative treatment technologies and resource recovery alternatives to the maximum extent practicable. Section 121(b)(1) also establishes a preference for remedial actions which employ, as a principal element, treatment to permanently and significantly reduce the volume, toxicity, or mobility of the hazardous substances, pollutants and contaminants at a site. CERCLA Section 121(d), 42 U.S.C. § 9621(d), further specifies that a remedial action must attain a level or standard of control of the hazardous substances, pollutants, and contaminants, which at least attains ARARs under federal and state laws, unless a waiver can be justified pursuant to CERCLA Section 121(d)(4), 42 U.S.C. § 9621(d)(4).

Common Elements for All Alternatives

Under each of the two alternatives presented, the existing treatment systems on Village supply wells 13 and 14 would continue to operate and protect the public from exposure to contamination in the OU1 portion of the groundwater plume. Each alternative requires and includes the operation, monitoring and maintenance (O&M) of the existing treatment systems, and assumes the continued operation of Village wells 13 and 14, until supply wells 13 and 14 no longer are impacted by contaminants above the MCLs. Neither alternative requires any modification to the current pumping rates or volumes of water pumped by Village supply wells 13 and 14.

In addition, both alternatives include institutional controls in the form of local laws that restrict future use of groundwater at the Site. Specifically, the Nassau County Sanitary Code regulates installation of private potable water supply wells in Nassau County.

Both alternatives also include institutional controls in the form of local zoning laws in that the Fulton Property is zoned for industrial use, and changes to the land use are not anticipated in the foreseeable future. If a change in land use is proposed, additional investigation of soils at the Fulton Property may be necessary to determine whether the change in land use could affect exposure risks at the property.

For each alternative, a Site management plan (SMP) would provide for the proper management of all OU1 remedy components, including institutional controls. The SMP would include: (a) O&M of Village supply wells 13 and 14 as well as monitoring of Site groundwater upgradient, sidegradient and downgradient of wells 13 and 14; (b) conducting an evaluation of the potential for vapor intrusion, and appropriate response action, if necessary, in the event of future construction at the Fulton Property; and (c) periodic certifications by the party(ies) implementing the remedy that any institutional and engineering controls are in place and being complied with.

Each alternative also includes a vapor intrusion evaluation of structures that are in the vicinity of the Fulton Property and that could potentially be affected by the OU1 portion of the groundwater contamination plume. An appropriate response action (such as sub-slab ventilation systems) may be implemented based on the results of the investigation. The O&M of the existing

sub-slab ventilation system at 150 Fulton Avenue would continue under both alternatives.

Below is a description of the two alternatives considered for this ROD Amendment:

GW-1: Continued Operation of Existing Treatment Systems on Village Wells 13 and 14.

Capital Cost	$1,118,578[1]
O & M Cost	$2,920,610
Present Worth Cost	$4,039,188
Construction Time	N/A
Duration	30 years

This alternative relies upon the continued operation and maintenance of the existing air stripper treatment units on Village wells 13 and 14 in order to protect the public from exposure to hazardous substances in groundwater, and to provide a safe drinking water supply. The costs associated with this alternative include the costs of replacing existing air strippers as the equipment wears out. This alternative includes the addition of a vapor-phase carbon unit, if needed, to capture and treat VOCs being discharged from the air stripper treatment units. This alternative also includes monitoring of contamination in groundwater entering wells 13 and 14.

For cost estimating purposes, a 30-year time frame was assumed as the duration of this alternative. The EPA expects, however, that PCE and TCE levels in the groundwater may exceed their

[1] The cost estimates in the 2007 ROD for this alternative were refined during the design of the 2007 remedy.

respective MCLs for greater than 30 years and, as a result, the treatment systems on Village wells 13 and 14 may need to be operated for greater than 30 years.

Because this alternative would result in contaminants remaining on Site above levels that would allow for unlimited use and unrestricted exposure, CERCLA requires that the Site be reviewed at least once every five years.

GW-2: Continued Operation of Existing Treatment Systems on Village wells 13 and 14, and Groundwater Extraction and Treatment

Capital Cost	$6,296,578
O & M Cost	$7,415,610
Present Worth Cost	$13,712,188
Construction Time	10 months
Duration	30 years

Alternative GW-2 was a component of the remedy chosen in the 2007 ROD. This alternative includes a separate groundwater extraction and treatment system that would be constructed in the OU1 portion of the groundwater plume, upgradient of Village wells 13 and 14. In the 2007 ROD, the EPA anticipated that the system would be constructed in the “Estate” area of the Village, and would pump and treat groundwater for discharge into the existing infiltration basin at the Garden City Bird Sanctuary for recharge to groundwater.

The 2007 ROD included the application of ISCO technology to address potential PCE source material in the shallow aquifer in the vicinity of the Fulton Property. As explained above, however, during the remedial design, the location of source

material amenable to treatment with ISCO was not identified in the immediate vicinity of the Fulton Property. The cost estimate for GW-2, therefore, does not include the cost of the ISCO injections that were included in the 2007 ROD remedy.

For cost-estimating purposes, a 30-year time frame was assumed as the duration of this alternative. The EPA expects, however, that PCE and TCE levels in the groundwater may exceed their respective MCLs for greater than 30 years and, as a result, the treatment systems on Village wells 13 and 14 and the separate groundwater extraction and treatment system may need to be operated for greater than 30 years.

Because this alternative would result in contaminants remaining on Site above levels that would allow for unlimited use and unrestricted exposure, CERCLA requires that the Site be reviewed at least once every five years.

COMPARATIVE ANALYSIS OF ALTERNATIVES

In selecting a remedy for a site, the EPA considers the factors set forth in CERCLA Section 121, 42 U.S.C. § 9621, by conducting a detailed analysis of the viable remedial alternatives pursuant to the NCP at 40 C.F.R. § 300.430(e)(9), the EPA's *Guidance for Conducting Remedial Investigations and Feasibility Studies*, OSWER Directive 9355.3-01, and the EPA's *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*, OSWER 9200.1-23.P. The detailed analysis consists of an assessment of the individual alternatives against each of the following nine evaluation criteria at 40 C.F.R. § 300.430(e)(9)(iii) and a comparative analysis focusing upon the relative performance of each alternative against those criteria.

- Overall protection of human health and the environment addresses whether a remedy provides adequate protection and describes how risks posed through each exposure pathway (based on a reasonable maximum exposure scenario) are eliminated, reduced, or controlled through treatment, engineering controls, or institutional controls.

- Compliance with ARARs addresses whether a remedy would meet all of the applicable or relevant and appropriate requirements of other federal and state environmental statutes and regulations, or provide grounds for invoking a waiver.

- Long-term effectiveness and permanence refers to the ability of a remedy to maintain reliable protection of human health and the environment over time, once cleanup goals have been met. It also addresses the magnitude and effectiveness of the measures that may be required to manage the risk posed by treatment residuals and/or untreated wastes.

- Reduction of toxicity, mobility, or volume through treatment evaluates an alternative's use of treatment to reduce the harmful effects of principal contaminants, their ability to move in the environment, and the amount of contamination present.

- Short-term effectiveness addresses the period of time needed to achieve protection and any adverse impacts on human health and the environment that may be posed during the construction and implementation period until cleanup goals are achieved.

- Implementability considers the technical and administrative feasibility of implementing the alternative, including factors such as the relative availability of goods and services.

- Cost includes estimated capital and operation and maintenance costs, and net present-worth costs. Present worth cost is the total cost of an alternative over time in terms of today's dollar value. Cost estimates are expected to be accurate within a range of +50 to -30 percent.

- State acceptance considers whether the State agrees with the EPA's analyses and recommendations, as described in the RI/FS and Proposed Plan.

- Community acceptance is assessed in the ROD, and considers whether the local community agrees with the EPA's analyses and preferred alternative. Comments received on the Proposed Plan are an important indicator of community acceptance.

The first two criteria above (overall protection of human health and the environment and compliance with ARARs) are known as “threshold criteria” because they are the minimum requirements that each response measure must meet in order to be eligible for selection as a remedy. The next five Superfund criteria (long-

term protectiveness and permanence, reduction of toxicity, mobility, or volume through treatment, short-term effectiveness, implementability and cost) are known as “primary balancing criteria” and are factors with which tradeoffs between response measures are assessed so that the best option will be chosen, given site-specific data and conditions. The final two evaluation criteria (state acceptance and community acceptance) are called “modifying criteria” because new information or comments from the state or the community on the Proposed Plan may cause the EPA to modify the preferred response measure or cause another response measure to be considered.

In keeping with EPA guidance, this modification of the OU1 remedial action is an interim remedy that will be protective of human health and the environment in the short term and is intended to provide adequate protection until a final remedy for the Site is implemented.

This section evaluates the relative performance of each of the two remedial alternatives discussed above against the nine criteria.

1. Overall Protection of Human Health and the Environment

Both alternatives include the continued operation and maintenance of the existing treatment systems installed on Village wells 13 and 14 as an interim remedy, and as such overall protection would not be achieved until the final remedy for the Site is selected. Nevertheless, the treatment systems will continue to protect the public from exposure to PCE and other VOCs in the OU1 portion of the groundwater contamination plume by providing a safe drinking water supply for the Village. The institutional controls will further restrict exposure to contaminants in groundwater.

The groundwater extraction and treatment system in GW-2 is also an interim remedy and would remove some VOC contamination from groundwater upgradient of Village wells 13 and 14. Analyses performed during the remedial design, however, raised uncertainties as to whether the extraction system selected in the 2007 ROD would significantly shorten the time needed to reach the MCL for PCE in the OU1 portion of the groundwater plume.

2. Compliance with ARARs

ARARs related to the Village supply wells 13 and 14 include the federal Safe Drinking Water Act (SDWA), 42 U.S.C. Sections 42 U.S.C. §§ 300f-300j-26 and the New York State Sanitary Code at 10 NYCRR Subpart 5-1, which relates to public water supply systems. Under both alternatives, the wellhead treatment systems for Village wells 13 and 14 would continue to achieve ARARs, including the federal MCLs for PCE, TCE and other VOCs in treated water as required under the SDWA or if more stringent, the state drinking water standards at 10 NYCRR Subpart 5-1.

The effluent from the pump-and-treat system called for in GW-2 would also achieve the federal MCLs for PCE and TCE, or if more stringent, the state drinking water standards. Restoration of the aquifer to MCLs will be addressed as part of the final Site remedy in OU2, and is not within the scope of this interim response action. Therefore, neither alternative identifies remediation goals for PCE and TCE in the groundwater for OU1 at this time.

3. Long-Term Effectiveness and Permanence

As indicated above, interim remedies are intended to be protective of human health and the environment in the short term, and to provide adequate protection until a final ROD is issued. This interim remedy, therefore, is not intended to provide a permanent remedy for OU1.

For both alternatives, the O&M of the treatment systems on Village wells 13 and 14 will continue to protect the public from exposure to contaminants in groundwater entering those wells. The OU1 remedy will be consistent with, and not preclude, a final remedy for the Site.

4. Reduction of Toxicity, Mobility, or Volume through Treatment

Because this action does not constitute the final remedy for the Site, the statutory preference for remedies that employ treatment that reduce toxicity, mobility or volume as a principal element will be fully addressed by the final response action.

The pumping of supply wells 13 and 14 provides an incidental benefit of helping to reduce the mobility of contaminants in the OU1 portion of the plume. The groundwater extraction and treatment system in Alternative GW-2 would provide additional

reduction in the toxicity, mobility, and volume of volatile organic contaminants in groundwater through removal and treatment of VOCs from the OU1 portion of the plume.

5. Short-Term Effectiveness

While minimal short-term impacts associated with the construction of new monitoring wells for the groundwater monitoring program will occur for both alternatives, Alternative GW-1 would not result in short-term impacts to human health and the environment because no construction is involved with respect to the existing treatment systems on Village supply wells 13 and 14. The GW-1 treatment systems already are in place and are protecting the public from impacts to human health. Alternative GW-2 would potentially result in greater short-term exposure to workers who may come into contact with contamination during more significant construction of the groundwater extraction and treatment system.

Installation of the extraction wells and associated piping for Alternative GW-2 would be completed in approximately 8-12 months. While efforts would be made to minimize the impacts, some disturbances would result from disruption of traffic, excavation activities on public and private land, noise, and fugitive dust emissions. Proper health and safety precautions and fugitive dust mitigation measures would help control these impacts.

6. Implementability

The technologies presented in Alternatives GW-1 and GW-2 have been used at other Superfund sites and are considered technically feasible.

The goods and services needed to implement GW-1 and GW-2 are readily available. Both alternatives are administratively implementable as well. No permits would be required for on-Site work pursuant to the permit exemption at Section 121(e)(1) of CERCLA, 42 U.S.C. § 9621(e)(1), although substantive requirements of otherwise-needed permits would be met.

7. Cost

The estimated capital, annual O&M (including monitoring), and present-worth costs for each of the alternatives are presented below:

Alternative	Capital Cost	Annual O&M	Present Worth
GW-1	$1,118,578	$2,920,610	$4,039,188
GW-2	$6,296,578	$7,415,610	$13,712,188

GW-1 has lower capital and O&M present worth costs than GW-2. The cost estimate for GW-1 is based on the "No Further Action – Limited Action" alternative described in the 2007 ROD, as updated by Genesco on November 18, 2014 and by the Village on January 14, 2015. The cost estimate for GW-2 is based on the cost estimate for the corresponding groundwater extraction and treatment system presented in the 2007 ROD, as adjusted based on updated cost information provided by Genesco during the remedial design of the 2007 remedy.

The cost estimates are order-of-magnitude engineering cost estimates that are expected to be within +50% to -30% of the actual cost of the project.

For cost-estimating purposes only, a 30-year time frame was used as the duration of each alternative. The EPA expects, however, that PCE and TCE levels in the aquifer may exceed their respective MCLs for greater than 30 years and, as a result, the treatment systems on Village supply wells 13 and 14 may need to be operated for greater than 30 years.

The GW-1 and GW-2 cost estimates do not include a separate cost item for the vapor intrusion response actions. Because the scope of the vapor intrusion-related work would be the same under both alternatives, the vapor intrusion response actions do not change the relative cost effectiveness of each of those alternatives. In addition, the costs of vapor intrusion response actions are relatively low, and the EPA does not expect the vapor intrusion response action costs to affect whether the actual remedy costs are within +50% to -30% of the cost estimates.

8. State Acceptance

The State of New York supports the selected remedy.

9. Community Acceptance

No comments were received other than those submitted at the May 12, 2015, public meeting. At the public meeting, the public expressed general support for the remedy proposed by the EPA in

the Proposed Plan (GW-1). In addition, the Nassau County Department of Health Services and the Village of Garden City expressed support for GW-1. The EPA's responses to significant public comments received on the Proposed Plan are provided in the attached Responsiveness Summary.

PRINCIPAL THREAT WASTE

The NCP establishes an expectation that the EPA will use treatment to address the principal threats posed by a Site whenever practicable (NCP Section 300.430(a)(1)(iii)(A)). The "principal threat" concept is applied to the characterization of "source materials" at a Superfund site. A source material is material that includes or contains hazardous substances, pollutants, or contaminants, such as dense nonaqueous phase liquid in soil, that act as a reservoir for the migration of contamination to groundwater, surface water, or air, or act as a source for direct exposure. Principal threat wastes are those source materials considered to be highly toxic or highly mobile that generally cannot be reliably contained or would present a significant risk to human health or the environment in the event exposure should occur. The decision to treat these wastes is made on a site-specific basis through a detailed analysis of alternatives, using the remedy selection criteria which are described above. The manner in which principal threat wastes are addressed provides a basis for making a statutory finding that the remedy employs treatment as a principal element.

No materials which meet the definition of "principal threat wastes" were identified during the OU1 RI/FS or during subsequent further investigations conducted as part of the remedial design activities since 2007.

AMENDED REMEDY

The EPA's selected remedy which amends the 2007 interim ROD is Alternative GW-1 (Continued Operation of Existing Treatment Systems on Village Wells 13 and 14). This remedy includes the following:

- Continued operation, maintenance and monitoring (O&M) of the air stripping treatment systems currently installed on Village wells 13 and 14 in order to protect the public from exposure to Site-related volatile organic compounds (VOCs), including PCE, in groundwater entering those wells. These treatment systems will be maintained and replaced or upgraded as needed in order to ensure that water

distributed to the public from wells 13 and 14 complies with ARARs, including MCLs under the federal Safe Drinking Water Act or, if more stringent, New York State drinking water standards at 10 NYCRR Part 5, Subpart 5-1. If needed, a vapor-phase carbon unit will be added to capture and treat VOCs being discharged from the air stripper treatment units. The pumping of supply wells 13 and 14 provides an incidental benefit of helping to reduce the mobility of contaminants in the OU1 portion of the plume. This ROD Amendment assumes the continued operation of Village wells 13 and 14 until those wells no longer are impacted by contaminants above the MCLs for PCE and TCE.

- A monitoring plan that will include groundwater sampling to monitor contaminant levels in groundwater at the Site. The monitoring program will include monitoring of contamination that is entering wells 13 and 14, monitoring of groundwater upgradient, sidegradient and downgradient of wells 13 and 14, and graphic depictions of the results.

- Institutional controls in the form of local laws that restrict future use of groundwater at the Site and limit exposure at the commercial facility located at 150 Fulton Avenue in Garden City Park, New York (the Fulton Property), a source of the groundwater contamination at the Site. Specifically, the Nassau County Sanitary Code regulates installation of private potable water supply wells in Nassau County. In addition, the commercial facility at the Fulton Property is zoned for industrial use, and the EPA does not anticipate any changes to the land use in the foreseeable future. If a change in land use is proposed, additional investigation of soils may be necessary to determine whether the change in land use could affect exposure risks at the Fulton Property.

- A vapor intrusion evaluation of structures that are in the vicinity of the Fulton Property and that could potentially be affected by the OU1 portion of the groundwater contamination plume. An appropriate response action (such as sub-slab ventilation systems) may be implemented based on the results of the investigation. The O&M of the existing sub-slab ventilation system at the Fulton Property will continue to be operated and maintained.

- A site management plan (SMP) that will provide for the proper management of all OU1 remedy components, including compliance with institutional controls. The SMP will

include: (a) O&M of the treatment systems on Village wells 13 and 14 as well as monitoring of Site groundwater upgradient, sidegradient and downgradient of wells 13 and 14; (b) conducting an evaluation of the potential for vapor intrusion, and an appropriate response action, if necessary, in the event of future construction at the Fulton Property; and (c) periodic certifications by the party(ies) implementing the remedy that any institutional and engineering controls are in place and being complied with.

SUMMARY OF THE RATIONALE FOR THE SELECTED REMEDY

The selected interim remedy will be protective of human health and the environment until a final remedy is implemented for the Site, will comply with the ARARs identified for this interim action, and is cost-effective. Although this interim action is not intended to address fully the statutory mandates for overall protection, permanence, and treatment to the maximum extent practicable, this interim action does utilize treatment at the Village wells, and thus supports part of the statutory mandate.

The selected alternative GW-1 (present-worth cost of approximately $4,039,188) is more cost-effective than GW-2. The GW-2 extraction and treatment system has a present-worth cost of approximately $13.7 million. GW-1 also would have fewer short-term impacts to workers and the community, and is more readily implementable because it does not involve the construction of an extraction and treatment system. The well head treatment systems of Alternative GW-1 are in place and, therefore, are already protecting the public from drinking water impacts to human health.

The continued operation of Village wells 13 and 14 will continue to help reduce migration of the OU1 portion of the groundwater plume toward the Franklin Square Water District wells. The Village wells 13 and 14 treatment systems also will have the incidental benefit of removing and treating contaminants in groundwater that enter those wells, and thereby reducing the mass and mobility of VOCs in the OU1 part of the groundwater plume.

The environmental benefits of the selected remedial alternative may be enhanced by employing design technologies and practices that are sustainable in accordance with the EPA Region 2’s Clean and Green Energy Policy, available at: http://epa.gov/region2/superfund/green_remediation.

Summary of the Estimated Remedy Costs

The estimated capital, annual O&M, and total present-worth costs for the selected remedy are $1,118,578, $2,920,610, and $4,039,188. A detailed cost estimate for the selected remedy is summarized in Appendix VI. The information in the cost estimate summary table is based on the best available information regarding the anticipated scope of the remedial alternative. This is an order-of-magnitude engineering cost estimate that is expected to be within +50% to -30% of the actual project cost.

Expected Outcomes of the Selected Remedy

The results of the human health risk assessment indicated that there is an unacceptable hazard from exposure to groundwater through ingestion and inhalation.

The selected remedy will:

- Prevent potential, current, and future human exposures including inhalation and ingestion of VOC-contaminated groundwater by effectively treating contaminants in groundwater entering Village water supply wells 13 and 14 so that distributed water is at levels that are protective of human health;
- Continue to help to prevent the OU1 portion of the groundwater plume from reaching the Franklin Square Water District wells;
- Allow time for additional efforts to be undertaken to identify more fully delineate the nature and extent of TCE and PCE contamination in the groundwater at the Site and also allow for a comprehensive evaluation of alternatives for Site-wide restoration of the aquifer; and
- Incidentally make some progress toward ultimately restoring groundwater to levels which meet ARARs within the aquifer.

The results of the risk assessment indicate that PCE and TCE pose an excess lifetime cancer risk above the EPA reference cancer risk range, and also pose unacceptable noncancer health hazards. PCE and TCE in the aquifer serve as sources of contamination to the groundwater. All scenarios involving the use of groundwater as a drinking water source showed considerably elevated risks, due primarily to the presence of PCE and TCE in the groundwater. Under the selected remedy, the removal of the PCE and TCE from the water supply wells will

address the excess lifetime cancer risk and noncancer hazards posed by PCE and TCE.

The selected remedy will ensure that the water supply obtained from Village wells 13 and 14 is protected until a final groundwater remedy is implemented for the Site.

STATUTORY DETERMINATIONS

Section 121(b)(1) of CERCLA mandates that a remedial action must be protective of human health and the environment, be cost-effective, and utilize permanent solutions and alternative treatment or resource recovery technologies to the maximum extent practicable. Section 121(b)(1) also establishes a preference for remedial actions which employ treatment to permanently and significantly reduce the volume, toxicity, or mobility of the hazardous substances, pollutants, or contaminants at the Site. Section 121(d) of CERCLA further specifies that a remedial action must attain a degree of cleanup that satisfies ARARs under federal and state laws, unless a waiver can be justified pursuant to Section 121(d)(4) of CERCLA. This selected interim remedy will ensure that the treatment systems will continue to effectively treat contaminants in groundwater entering Village wells 13 and 14 so that distributed water is at levels that are protective of human health.

In the 2007 ROD, the EPA indicated that the OU1 portion of the contamination plume would be restored to its beneficial use when the TCE-dominant contamination is addressed in OU2. Because the nature and extent of the contamination present in the OU1 and OU2 portions of the plume – including sources of TCE - have not yet been fully identified, the EPA does not have sufficient information at this time to determine whether groundwater at the Site can be fully restored, and will conduct additional investigations as part of OU2. Currently, groundwater restoration is one of the EPA's goals for the final Site remedy. The OU1 interim remedy will neither be inconsistent with, nor preclude, implementation of a final remedy for the Site.

Overall Protection of Human Health and the Environment

The selected remedy will protect human health and the environment until a final remedy can be selected and implemented, through removal of contaminants from the groundwater entering Village supply wells 13 and 14. This will be monitored, and the treatment systems will be maintained and replaced or upgraded as needed in order to ensure that water

distributed to the public from Village wells 13 and 14 complies with ARARs and to help to limit the migration of contaminants in the groundwater.

Compliance with ARARs

The ARARs for the selected interim OU1 remedy include the SDWA and New York State Sanitary Code at 10 NYCRR Subpart 5-1, which relates to public water supply systems. The primary standards include federal MCLs, which are enforceable standards for specific contaminants based on public health factors as well as the technical and economic feasibility of removing the contaminants from the water supply. The MCL for both PCE and TCE is 5 ppb. ARARs and other environmental criteria, advisories or guidance for this interim action are presented in Appendix II Table 10.

This OU1 remedy will immediately comply with these ARARs because the well 13 and 14 treatment systems currently are operating and effectively removing VOCs from groundwater prior to public distribution.

Cost-Effectiveness

A cost effective remedy is one whose costs are proportional to its overall effectiveness (NCP Section 300.430(f)(ii)(D)). Overall effectiveness is based on the evaluations of the following three evaluation criteria: long-term effectiveness and permanence; reduction of toxicity, mobility, and volume through treatment; and short-term effectiveness. The selected remedy provides adequate protection of the public, the pumping and treatment of supply wells 13 and 14 provides an incidental benefit of helping to reduce the toxicity, mobility, and volume of contaminants in the OU1 portion of the plume, and the selected remedy is immediately protective (because the well 13 and 14 treatment systems are currently operating) while having minimal short-term impacts. The costs of the selected remedy are proportional to its overall effectiveness, and the selected remedy therefore is cost effective.

Utilization of Permanent Solutions and Alternative Treatment Technologies to the Maximum Extent Practicable

The selected remedy is an interim remedy that is not intended to utilize permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent

practicable. Subsequent actions will be evaluated to address fully the threats posed by conditions at the Site.

Preference for Treatment as a Principal Element

Because this action does not constitute the final remedy for the Site, the statutory preference for remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element will be addressed by the final response action.

The Village wells 13 and 14 treatment systems will have the incidental benefit of removing and treating contaminants in groundwater that enters those wells, and thereby reducing the mass and mobility of VOCs in the OU1 part of the groundwater plume.

Five-Year Review Requirements

Due to the interim nature of this remedy and because contamination will remain on Site at levels that do not allow for unlimited use and unrestricted exposure, a review of Site conditions will be conducted at least once every five years.

DOCUMENTATION OF SIGNIFICANT CHANGES

The Proposed Plan for the Fulton Avenue Superfund Site was released for public comment on April 24, 2015, and the public comment period ran from that date through May 26, 2015. The Proposed Plan identified Groundwater Alternative GW-1 as the preferred alternative. The Proposed Plan was presented at a public meeting on May 12, 2015.

All written and verbal comments submitted during the public comment period were reviewed by the EPA. Upon review of these comments, the EPA has determined that no significant changes to the remedy, as it was originally identified in the Proposed Plan, are necessary.

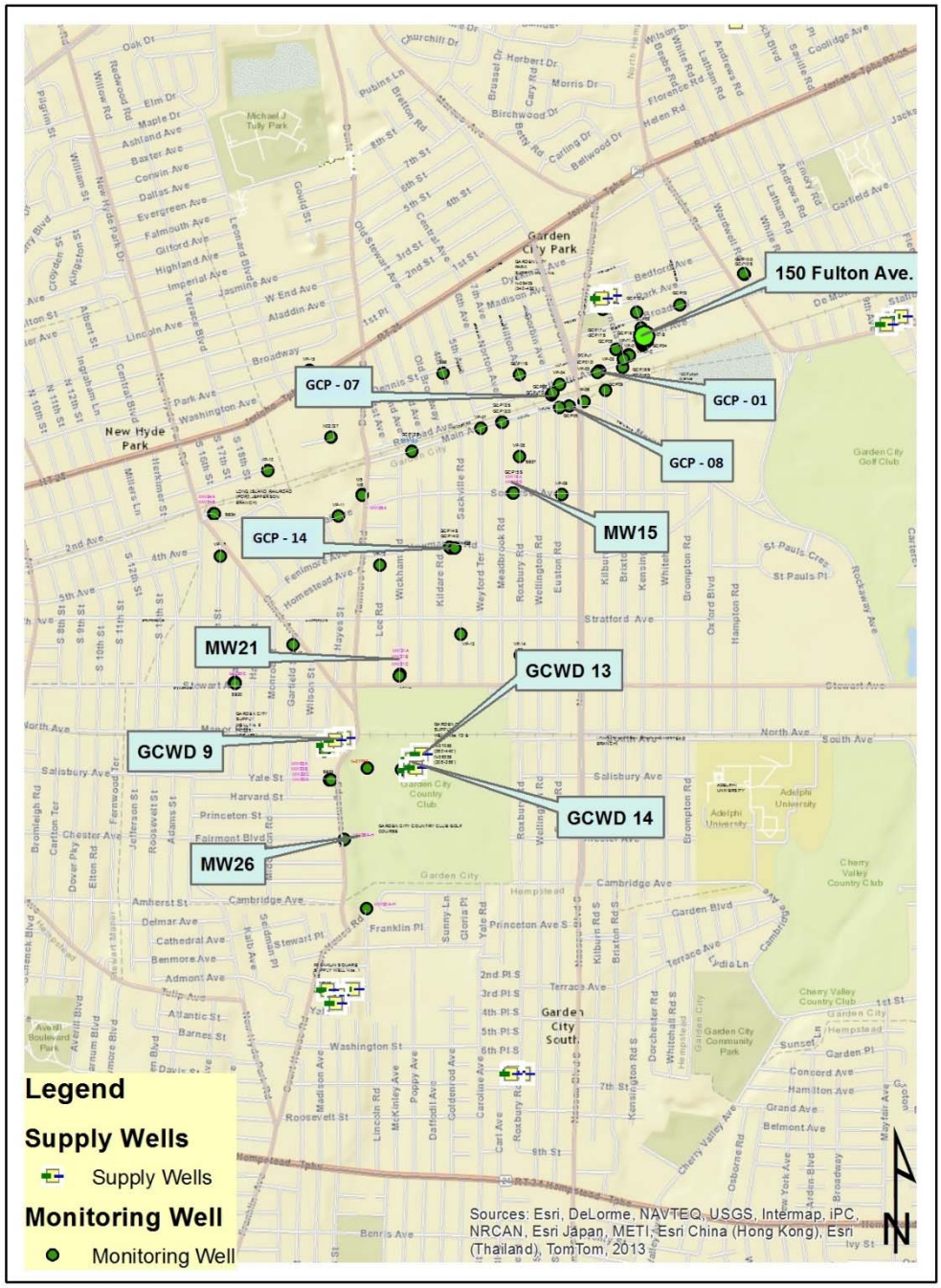
APPENDIX I

FIGURES

APPENDIX I

FIGURES

Fulton Ave. Site OU-1



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APPENDIX II

TABLES

Table 1
Summary of May 2015 Groundwater Sample Results
150 Fulton Avenue Site, Garden City Park, New York

Well/Boring/Sample ID:	NYS AWQS & GV [1,2]	GCP01-52.5	GCP08-64.2	GCP15S-51	GCP18S-48.5	GCP18D-118	DUP050715	MS-445	MI6-220	MW15A-145	MW15B-356	MW20A-145	MW20B-249	MW20C-405	MW21A-125	MW21B-335	MW21C-395	DUP050115	MW22A-125	MW22B-275
Lab Sample ID:		JB94107-9	JB94230-3	JB93989-5	JB94230-1	JB94230-2	JB94230-4	JB93989-2	JB93989-1	JB93989-3	JB93989-4	JB93700-4	JB93700-3	JB93700-5	JB93787-4	JB93787-3	JB93787-1	JB93787-2	JB94352-1	JB93885-3
Date Sampled:		5/6/2015	5/7/2015	5/5/2015	5/7/2015	5/7/2015	5/7/2015	5/5/2015	5/5/2015	5/5/2015	5/5/2015	4/30/2015	4/30/2015	4/30/2015	5/1/2015	5/1/2015	5/1/2015	5/1/2015	5/6/2015	5/4/2015
Matrix:		Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Blind Dupe of GCP18D	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Blind Dupe of MW-21C	Groundwater	Groundwater
GC/MS Volatiles (SW846 8260B)																				
1,1,1-Trichloroethane	5	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	0.08 J	0.26 J	0.20 J	ND (0.12) J	ND (0.12)	ND (0.12)	ND (0.12)	1.7 J	0.39 J	0.41 J	ND (0.12)	ND (0.12)
1,1,2,2-Tetrachloroethane	5	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.19)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)
1,1,2-Trichloroethane	1	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.22)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
1,1-Dichloroethane	5	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	0.53 J	1	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	0.84 J	0.24 J	0.22 J	ND (0.097)	ND (0.097)
1,1-Dichloroethene	5	0.41 J	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	0.41 J	0.42 J	ND (0.14) J	ND (0.14)	ND (0.14)	ND (0.14)	3.8	1.3	1.2	ND (0.14)	ND (0.14)
1,2,4-Trichlorobenzene	5	0.36 J	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.22)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
1,2-Dibromo-3-chloropropane	0.04	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (1.0)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)
1,2-Dibromoethane	0.0006	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.25)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)
1,2-Dichlorobenzene	3	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.13)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)
1,2-Dichloroethane	0.6	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.17)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)
1,2-Dichloropropane	1	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.21)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)
1,3-Dichlorobenzene	3	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.22)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
1,4-Dichlorobenzene	3	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.12)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)
1,4-Dioxane		ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (21)	ND (10)	ND (10)	ND (10)	ND (10)
2-Butanone (MEK)	50	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (2.5)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)
2-Hexanone	50	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (2.9)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)
4-Methyl-2-pentanone(MIBK)		ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.38)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)
Acetone	50	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	5.5	ND (1.7)	3.7 J	ND (3.3)	ND (1.7)	ND (1.7)	ND (1.7)
Benzene	1	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	3.4	ND (0.18)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)
Bromochloromethane	5	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.31)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)
Bromodichloromethane	50	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.21)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
Bromoform	50	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.16)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)
Bromomethane	5	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.21)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)
Carbon disulfide	60	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	0.55 J	ND (0.18)	0.27 J	ND (0.37)	ND (0.18)	ND (0.18)	ND (0.18)
Carbon tetrachloride	5	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096) J	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.19)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)
Chlorobenzene	5	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.17)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)
Chloroethane	5	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.30)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)
Chloroform	7	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	0.45 J	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.17)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)
Chloromethane	5	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.23)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)
cis-1,2-Dichloroethene	5	284	1	ND (0.14)	6.1	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	21.9	0.53 J	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	14.5	2.3	2.2	ND (0.14)	ND (0.14)
cis-1,3-Dichloropropene	0.4	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.16)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)
Dibromochloromethane	50	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.23)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)
Ethylbenzene	5	ND (0.20)	ND (0.20)	ND (0.20)	0.37 J	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	1.1	ND (0.40)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)
Methylene chloride	5	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	2.6 J	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
Styrene	5	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.11)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)
Tetrachloroethene	5	1920	1.1	ND (0.12)	1.5	ND (0.12)	ND (0.12)	0.30 J	1.3	399	57.4	ND (0.12)	ND (0.12)	0.52 J	0.49 J	1470	318	394	0.70 J	ND (0.12)
Toluene	5	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	12.2	ND (0.13)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)
trans-1,2-Dichloroethene	5	0.56 J	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.48)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)
trans-1,3-Dichloropropene	0.4	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.22)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
Trichloroethene	5	354	ND (0.064)	ND (0.064)	0.60 J	ND (0.064)	ND (0.064)	ND (0.064)	1.1	21.8	4.6	ND (0.064)	ND (0.064)	1.1	ND (0.064)	154	18.8	18.2	ND (0.064)	ND (0.064)
Vinyl chloride	2	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	0.23 J	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.21)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)
Xylene (total)	5	0.70 J	ND (0.12)	ND (0.12)	0.26 J	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	6.7	ND (0.25)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)
Total VOCs		2560.07	2.1	0	8.85	0	0	0.3	3.75	444.59	73.15	0	6.05	1.62	27.86	1647.44	341.03	326.23	0.7	0
Total VOC TICs		0	0	0	38.4 J	0	0	0	0	0	0	0	0	0	7.3 J	0	0	0	0	0

Legend: All concentrations are in ug/L

#	1. AWQS - NYS Ambient Groundwater Quality Standards for Class GA (potable) ground water as listed in TOGS 1.1.1 (June 1998) and in 6 NYCRR 703.5.
#	2. AWQGV - NYS Ambient Groundwater Quality Guidance Values for Class GA (potable) ground water as listed in TOGS 1.1.1 (June 1998) and in 6 NYCRR 703.5.
(#) U	Not detected at the specified reporting limit.
Detected	Compound was detected at the indicated concentration.
[Exceed]	Results flagged as "Exceed" if any of the selected criteria exceeded (most stringent).

J : Estimated value

TIC: Tentatively Identified Compounds based on a search of organic compound mass spectra.

Table 1
Summary of May 2015 Groundwater Sample Results
150 Fulton Avenue Site, Garden City Park, New York

Well/Boring/Sample ID:	NYS AWQS & GV [1,2]	MW22C-315	DUP050415	MW23A-265	MW23B-350	MW23C-403	MW23D-447	MW24A-380	MW24B-420	MW25A-345	MW26B-271.5	MW26C-325	MW26D-350.5	MW26E-377	MW26F-419.5	MW26G-443	MW26H-473.5	MW27A-197	MW27B-241.5	MW27C-289
Lab Sample ID:		JB93885-6	JB93885-7	JB93700-1	JB93885-1	JB93700-2	JB93885-2	JB93787-5	JB93787-6	JB94107-1	JB94107-2	JB94107-3	JB94107-4	JB94107-5	JB94107-6	JB94107-7	JB94107-8	JB94230-5	JB94230-6	JB94230-7
Date Sampled:		5/4/2015	5/4/2015	4/30/2015	5/4/2015	4/30/2015	5/4/2015	5/1/2015	5/1/2015	5/5/2015	5/5/2015	5/5/2015	5/5/2015	5/5/2015	5/5/2015	5/5/2015	5/5/2015	5/7/2015	5/7/2015	5/7/2015
Matrix:		Groundwater	Blind Dupe of MW-22C	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Groundwater
GC/MS Volatiles (SW846 8260B)																				
1,1,1-Trichloroethane	5	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)
1,1,2,2-Tetrachloroethane	5	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)
1,1,2-Trichloroethane	1	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
1,1-Dichloroethane	5	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)
1,1-Dichloroethene	5	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	0.60 J	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)
1,2,4-Trichlorobenzene	5	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
1,2-Dibromo-3-chloropropane	0.04	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)
1,2-Dibromoethane	0.0006	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)
1,2-Dichlorobenzene	3	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063) J	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)
1,2-Dichloroethane	0.6	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)
1,2-Dichloropropane	1	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	0.59 J	ND (0.10)	0.44 J	ND (0.10) J	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)
1,3-Dichlorobenzene	3	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
1,4-Dichlorobenzene	3	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061) J	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)
1,4-Dioxane		ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)
2-Butanone (MEK)	50	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)
2-Hexanone	50	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)
4-Methyl-2-pentanone(MIBK)		ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)
Acetone	50	1.8 J	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	6.1	ND (1.7)	5.3	ND (1.7)	ND (1.7)	ND (1.7)	6.7	4.4 J	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)
Benzene	1	ND (0.090)	ND (0.090)	0.38 J	ND (0.090)	ND (0.090)	ND (0.090)	0.48 J	3.7	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)	ND (0.090)
Bromochloromethane	5	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15) J	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)
Bromodichloromethane	50	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11) J	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
Bromoform	50	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)
Bromomethane	5	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)
Carbon disulfide	60	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	0.25 J	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)
Carbon tetrachloride	5	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	0.37 J	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)
Chlorobenzene	5	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)
Chloroethane	5	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)
Chloroform	7	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)
Chloromethane	5	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	0.27 J	0.31 J	ND (0.12)	ND (0.12)	0.27 J	ND (0.12)	ND (0.12)
cis-1,2-Dichloroethene	5	ND (0.14)	ND (0.14)	ND (0.14)	0.25 J	0.53 J	0.53 J	1.3	0.22 J	1.5	ND (0.14) J	ND (0.14)	0.47 J	2.1	7.6	1.2	0.31 J	ND (0.14)	ND (0.14)	ND (0.14)
cis-1,3-Dichloropropene	0.4	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078) J	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)
Dibromochloromethane	50	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12) J	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)
Ethylbenzene	5	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)
Methylene chloride	5	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
Styrene	5	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053) J	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)
Tetrachloroethene	5	0.21 J	ND (0.12)	ND (0.12)	3.5	4.8	9.4	12.1	4.8	13.9	0.44 J	0.36 J	2.3	15.1	30.9	8.4	1.5	ND (0.12)	ND (0.12)	ND (0.12)
Toluene	5	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	0.44 J	0.44 J	ND (0.064)	0.26 J	ND (0.064)	ND (0.064)	ND (0.064)
trans-1,2-Dichloroethene	5	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)
trans-1,3-Dichloropropene	0.4	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
Trichloroethene	5	ND (0.084)	ND (0.084)	0.32 J	37.2	39.6	84.1	81.2	6.8	19.3	ND (0.084)	ND (0.084)	0.60 J	7.4	12.6	37.7	18.2	ND (0.084)	ND (0.084)	ND (0.084)
Vinyl chloride	2	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)
Xylene (total)	5	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)
Total VOCs		2.01	0	0.7	40.95	44.93	94.03	102.35	14.52	40.44	0.81	0.36	3.37	32.01	56.41	47.3	20.27	0.85	0	0
Total VOC TICs		0	0	6.1 J	0	0	0	8.2 J	0	6.4 J	0	0	0	56 J	5.1 J	0	0	0	0	0

Legend: All concentrations are in ug/l.

#	1. AWQS - NYS Ambient Groundwater Quality Standards for Class GA (potable) ground water as listed in TOGS 1.1.1 (June 1998) and in 6 NYCRR 703.5.
#	2. AWQGV - NYS Ambient Groundwater Quality Guidance Values for Class GA (potable) ground water as listed in TOGS 1.1.1 (June 1998) and in 6 NYCRR 703.5.
(#) U	Not detected at the specified reporting limit.
Detected	Compound was detected at the indicated concentration.
[Exceed]	Results flagged as "Exceed" if any of the selected criteria exceeded (most stringent).

J : Estimated value
TIC: Tentatively Identified Compounds based on a search of organic compound mass spectra.

Table 1
Summary of May 2015 Groundwater Sample Results
150 Fulton Avenue Site, Garden City Park, New York

Well/Boring/Sample ID:	NYS AWQS & GV [1,2]	MW27D-329.5	MW27E-369	MW27F-413.5	MW27G-443	MW27H-476.5	TB043015	TB050115	TB050415	TB050515	TB050615	TB050715	TB050815	FB043015	FB050115	FB050415	FB050515	FB050615	FB050715	FB050815
Lab Sample ID:		JB94230-8	JB94230-9	JB94230-10	JB94230-11	JB94230-12	JB93700-6	JB93787-7	JB93885-5	JB93989-6	JB94107-11	JB94230-13	JB94352-3	JB93700-7	JB93787-8	JB93885-6	JB93989-7	JB94107-10	JB94230-14	JB94352-2
Date Sampled:		5/7/2015	5/7/2015	5/7/2015	5/7/2015	5/7/2015	4/30/2015	5/1/2015	5/4/2015	5/5/2015	5/6/2015	5/7/2015	5/8/2015	4/30/2015	5/1/2015	5/4/2015	5/5/2015	5/6/2015	5/7/2015	5/8/2015
Matrix:		Groundwater	Groundwater	Groundwater	Groundwater	Groundwater	Trip Blank Water	Trip Blank Water	Trip Blank Water	Trip Blank Water	Trip Blank Water	Trip Blank Water	Trip Blank Water	Field Blank Water	Field Blank Water	Field Blank Water	Field Blank Water	Field Blank Water	Field Blank Water	Field Blank Water
GC/MS Volatiles (SW846 8260B)																				
1,1,1-Trichloroethane	5	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND [0.12]	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)
1,1,2,2-Tetrachloroethane	5	ND (0.096)	ND (0.099)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.099)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.099)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)
1,1,2-Trichloroethane	1	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND [0.11]	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
1,1-Dichloroethane	5	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)	ND (0.097)
1,1-Dichloroethene	5	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND [0.14]	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)
1,2,4-Trichlorobenzene	5	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND [0.11]	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
1,2-Dibromo-3-chloropropane	0.04	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND [0.51]	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)
1,2-Dibromoethane	0.0006	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND [0.13]	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)	ND (0.13)
1,2-Dichlorobenzene	3	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)	ND (0.063)
1,2-Dichloroethane	0.6	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)	ND (0.087)
1,2-Dichloropropane	1	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND [0.10]	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)
1,3-Dichlorobenzene	3	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND [0.11]	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
1,4-Dichlorobenzene	3	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)	ND (0.061)
1,4-Dioxane		ND (10)	ND [10]	ND (10)	ND (10)	ND (10)	ND (10)	ND [10]	ND (10)	ND [10]	ND (10)	ND (10)	ND (10)	ND (10)	ND (10)	ND [10]	ND (10)	ND (10)	ND (10)	ND (10)
2-Butanone (MEK)	50	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND [1.2]	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)	ND (1.2)
2-Hexanone	50	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND [1.4]	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)	ND (1.4)
4-Methyl-2-pentanone(MIBK)		ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND [0.19]	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)	ND (0.19)
Acetone	50	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND [1.7]	ND (1.7)	1.6 J	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	ND (1.7)	2.1 J	ND (1.7)	ND (1.7)	ND (1.7)
Benzene	1	ND (0.060)	ND (0.060)	ND (0.060)	ND (0.060)	ND (0.060)	ND (0.060)	ND [0.060]	ND (0.060)	ND (0.060)	ND (0.060)	ND (0.060)	ND (0.060)	ND (0.060)	ND (0.060)	ND (0.060)	ND (0.060)	ND (0.060)	ND (0.060)	ND (0.060)
Bromochloromethane	5	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND [0.15]	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)
Bromodichloromethane	50	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND [0.11]	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
Bromoform	50	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND [0.081]	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)	ND (0.081)
Bromomethane	5	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND [0.10]	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)
Carbon disulfide	60	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	0.48 J	ND (0.18)	ND [0.18]	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)	ND (0.18)
Carbon tetrachloride	5	ND (0.096)	ND (0.095)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND [0.095]	ND (0.096)	ND (0.095)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.095)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)	ND (0.096)
Chlorobenzene	5	ND (0.086)	ND (0.088)	ND (0.086)	ND (0.088)	ND (0.088)	ND (0.086)	ND (0.085)	ND (0.086)	ND (0.085)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.085)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)
Chloroethane	5	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND [0.15]	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)	ND (0.15)
Chloroform	7	ND (0.088)	ND (0.088)	ND (0.086)	ND (0.088)	ND (0.088)	ND (0.086)	ND (0.088)	ND (0.086)	ND (0.085)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.085)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)	ND (0.086)
Chloromethane	5	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND [0.12]	ND (0.12)	0.35 J	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)
cis-1,2-Dichloroethene	5	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	1.6	ND (0.14)	ND [0.14]	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)	ND (0.14)
cis-1,3-Dichloropropene	0.4	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)	ND (0.078)
Dibromochloromethane	50	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND [0.12]	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)
Ethylbenzene	5	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND [0.20]	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)	ND (0.20)
Methylene chloride	5	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND [0.11]	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
Styrene	5	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)	ND (0.053)
Tetrachloroethene	5	ND (0.12)	ND (0.12)	ND (0.12)	0.68 J	ND (0.12)	ND (0.12)	ND [0.12]	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)
Toluene	5	ND (0.064)	ND (0.064)	0.29 J	0.26 J	0.33 J	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)	ND (0.064)
trans-1,2-Dichloroethene	5	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND [0.24]	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)	ND (0.24)
trans-1,3-Dichloropropene	0.4	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND [0.11]	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)	ND (0.11)
Trichloroethene	5	ND (0.084)	ND (0.084)	ND (0.084)	1.1	0.57 J	ND (0.084)	ND (0.084)	ND (0.084)	ND (0.084)	ND (0.084)	ND (0.084)	ND (0.084)	ND (0.084)	ND (0.084)	ND (0.084)	ND (0.084)	ND (0.084)	ND (0.084)	ND (0.084)
Vinyl chloride	2	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND [0.10]	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)
Xylene (total)	5	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND [0.12]	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)	ND (0.12)
Total VOCs		0	0	0.29	2.34	2.98	0	0	0	2.15	0	0	0	0	0	0	2.1	0	0	0
Total VOC TICs		0	0	0	0	7.5 J	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Legend: All concentrations are in ug/l

#	1. AWQS - NYS Ambient Groundwater Quality Standards for Class GA (potable) ground water as listed in TOGS 1.1.1 (June 1998) and in 6 NYCRR 703.5.
#	2. AWQGV - NYS Ambient Groundwater Quality Guidance Values for Class GA (potable) ground water as listed in TOGS 1.1.1 (June 1998) and in 6 NYCRR 703.5.
(#) U	Not detected at the specified reporting limit.
Detected	Compound was detected at the indicated concentration.
[Exceed]	Results flagged as "Exceed" if any of the selected criteria exceeded (most stringent).

J : Estimated value
TIC: Tentatively Identified Compounds based on a search of organic compound mass spectra.

Table 2
Summary of Historic Ground Water Monitoring Well Sample Results for Select Predominant Compounds
150 Fulton Avenue, Garden City Park, New York

ERM

GCP01			
Date	PCE	TCE	cis-1,2-DCE
12/06/84	3,700.0	3.0	0.0
03/27/85	3,400.0	4.0	0.0
12/18/85	35,000.0	350.0	1,400.0
01/17/85	50,000.0	350.0	780.0
04/19/89	3,700.0	160.0	190.0
11/09/90	360.0	3.0	0.0
01/17/92	1,400.0	11.0	1.0
06/18/92	13,000.0	75.0	48.0
08/27/93	20,000.0	3,100.0	650.0
04/21/94	7,900.0	330.0	0.0
05/10/95	3,600.0	150.0	0.0
08/16/95	3,200.0	110.0	0.0
09/09/98	1,200.0	21.0	5.0
10/02/01	2,600.0	2,200.0	360.0
06/13/03	5,900.0	110.0	100.0
12/17/03	440.0	180.0	750.0
05/10/04	220.0	28.0	39.0
12/08/04	3,300.0	160.0	9.0
05/20/05	610.0	15.0	3.0
11/03/05	580.0	120.0	0.0
06/07/06	325.0	10.3	0.0
12/22/06	1,940.0	63.0	0.0
12/18/08	1,420.0	1,350.0	24.5
11/14/11	198.0	24.7	24.0
12/19/11	984.0	129.0	22.9
01/28/14	2,400.0	1,700.0	569.0
01/28/14	2,480.0	1,800.0	547.0
03/03/15	210.0	12.9	3.5
06/09/15	1,920.0	354.0	284.0
Min	198.0	3.0	0.0
Max	50,000.0	3,100.0	1,400.0
Average	5,986.1	445.7	200.4

GCP01D			
Date	PCE	TCE	cis-1,2-DCE
08/16/95	145.0	2.9	5.0
09/09/98	0.0	0.0	0.0
10/02/01	16.0	0.3	0.2
07/14/03	15.0	0.3	0.0
06/13/03	28.0	0.5	0.0
12/19/03	3.0	0.0	0.0
05/10/04	4.0	0.0	0.0
12/08/04	5.0	0.0	0.0
05/20/05	4.0	0.0	0.0
11/03/05	16.0	0.0	0.0
05/07/06	2.8	0.0	0.0
12/22/06	9.3	0.0	0.0
12/18/08	42.8	0.6	0.5
11/14/11	13.8	0.7	2.5
03/02/15	2.0	0.0	0.0
Min	0.0	0.0	0.0
Max	145.0	2.9	5.0
Average	20.4	0.4	0.5

GCP02			
Date	PCE	TCE	cis-1,2-DCE
12/06/84	150.0	440.0	0.0
03/27/85	17.0	54.0	0.0
12/18/85	200.0	96.0	14.0
04/26/89	170.0	52.0	5.0
11/09/90	46.0	7.0	5.0
01/08/91	230.0	8.0	12.0
01/17/92	43.0	16.0	6.0
06/18/92	44.0	46.0	23.0
08/25/93	16.0	30.0	34.0
04/21/94	15.0	25.0	17.0
05/09/95	2.4	11.0	0.0
08/16/96	4.0	6.0	3.0
09/10/01	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	230.0	440.0	34.0
Average	72.3	61.2	9.2

GCP03			
Date	PCE	TCE	cis-1,2-DCE
11/29/85	0.0	0.0	0.0
12/20/85	240.0	82.0	16.0
04/27/89	8.0	220.0	87.0
10/12/90	4.0	33.0	10.0
03/26/91	2.0	25.0	12.0
07/05/91	2.0	17.0	6.0
01/13/92	4.0	12.0	4.0
06/16/92	12.0	69.0	58.0
08/26/93	8.0	91.0	25.0
04/21/94	5.8	42.0	24.0
05/10/95	2.4	38.0	0.0
09/21/01	2.0	22.0	10.0
Min	0.0	0.0	0.0
Max	240.0	220.0	87.0
Average	24.1	60.1	20.3

GCP04			
Date	PCE	TCE	cis-1,2-DCE
11/27/85	300.0	40.0	NS
12/19/85	120.0	28.0	14.0
10/12/90	8.0	3.0	1.0
07/05/91	120.0	10.0	14.0
01/17/92	28.0	120.0	2.0
06/16/92	92.0	620.0	6.0
08/23/93	84.0	300.0	13.0
04/21/94	36.0	55.0	3.0
05/10/95	610.0	41.0	NS
09/07/00	15.4	11.5	1.5
09/10/01	10.0	20.0	3.0
11/15/11	1.9	0.0	0.0
03/04/15	1.0	0.0	0.0
Min	1.0	0.0	0.0
Max	610.0	620.0	14.0
Average	127.9	95.0	5.0

GCP05			
Date	PCE	TCE	cis-1,2-DCE
11/27/85	450.0	930.0	NA
12/19/85	310.0	210.0	0.0
10/12/90	300.0	71.0	5.0
07/09/91	95.0	40.0	5.0
01/15/92	87.0	24.0	5.0
06/17/92	55.0	21.0	3.0
08/25/93	47.0	19.0	4.0
04/21/94	110.0	25.0	0.0
05/09/95	27.0	4.2	NA
09/23/01	0.9	3.0	1.0
Min	0.9	3.0	0.0
Max	450.0	930.0	5.0
Average	148.3	124.8	2.9

GCP06			
Date	PCE	TCE	cis-1,2-DCE
11/27/85	0.0	0.0	NA
12/20/85	0.0	0.0	0.0
04/25/89	0.0	1.0	0.0
11/09/90	3.0	0.0	0.0
01/08/91	5.0	0.0	0.0
01/13/92	11.0	23.0	0.0
06/17/92	11.0	23.0	0.0
08/23/93	9.0	14.0	0.0
04/25/94	0.0	0.0	0.0
09/12/01	6.0	4.0	0.1
Min	0.0	0.0	0.0
Max	11.0	23.0	0.1
Average	4.7	6.5	0.0

GCP07S			
Date	PCE	TCE	cis-1,2-DCE
11/01/85	1,700.0	60.0	26.0
12/19/85	2,300.0	100.0	52.0
04/19/89	59.0	29.0	3.0
06/21/90	29,000.0	800.0	520.0
10/02/90	10,000.0	470.0	380.0
01/02/91	3,900.0	190.0	76.0
01/22/92	430.0	18.0	0.0
06/18/92	280.0	0.0	0.0
08/27/93	84.0	11.0	1.0
04/22/94	30.0	6.7	2.5
08/16/95	0.0	1.2	0.0
09/07/01	1.0	0.0	0.0
03/06/15	3.8	0.0	0.0
Min	0.0	0.0	0.0
Max	29,000.0	800.0	520.0
Average	3,675.9	132.1	81.7

GCP07D			
Date	PCE	TCE	cis-1,2-DCE
01/22/92	343.0	10.2	7.6
06/18/92	170.0	16.0	9.0
08/20/93	160.0	9.0	21.0
04/21/94	44.0	0.0	0.0
08/16/95	220.0	11.0	13.0
09/02/99	0.0	0.0	0.0
09/07/01	8.0	0.6	0.0
03/06/15	6.5	0.2	0.0
Min	0.0	0.0	0.0
Max	343.0	16.0	21.0
Average	122.7	5.7	6.3

GCP08			
Date	PCE	TCE	cis-1,2-DCE
01/31/85	67.0	0.0	0.0
12/19/85	250.0	1.0	0.0
04/26/89	320.0	3.0	0.0
09/21/90	67.0	1.0	0.0
12/31/90	28.0	0.0	0.0
01/13/92	72.0	1.0	0.0
06/16/92	1,600.0	87.0	490.0
08/26/93	470.0	54.0	570.0
04/25/94	850.0	110.0	530.0
09/28/01	1,600.0	12.0	2.0
06/18/03	940.0	27.0	43.0
12/17/03	350.0	17.0	12.0
05/10/04	200.0	40.0	66.0
12/08/04	710.0	15.0	150.0
05/19/05	520.0	35.0	140.0
11/04/05	280.0	26.0	67.0
06/07/06	120.0	8.8	16.2
12/22/06	27.6	2.8	1.0
12/18/08	32.6	4.0	107.0
11/14/11	4.6	0.6	8.4
01/28/14	1.6	0.0	0.9
03/03/15	1.6	0.0	0.6
05/27/15	1.1	0.0	1.0
Min	1.1	0.0	0.0
Max	1,600.0	110.0	570.0
Average	371.0	26.3	95.8

GCP09			
Date	PCE	TCE	cis-1,2-DCE
11/01/85	16.0	0.0	0.0
12/19/85	36.0	0.0	0.0
09/21/90	17.0	0.0	0.0
12/31/90	4.0	0.0	0.0
01/08/91	14.0	0.0	0.0
01/13/92	4.0	0.0	0.0
06/18/92	11.0	0.0	0.0
08/26/93	9.0	0.0	0.0
04/25/94	24.0	0.0	0.0
09/22/95	110.0	0.0	14.0
10/01/01	47.0	4.0	2.0
11/14/11	0.0	0.0	0.0
03/06/15	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	110.0	4.0	14.0
Average	22.5	0.3	1.2

GCP10S			
Date	PCE	TCE	cis-1,2-DCE
01/06/92	6.8	0.0	0.0
06/10/92	0.0	0.0	0.0
08/16/93	0.0	0.0	0.0
04/26/94	6.8	42.0	24.0
01/26/99	0.0	0.0	0.0
09/05/01	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	6.8	42.0	24.0
Average	2.3	7.0	4.0

GCP10D			
Date	PCE	TCE	cis-1,2-DCE
01/03/92	6.2	0.0	0.0
06/13/92	0.0	0.0	0.0
08/16/93	0.0	0.0	0.0
04/26/94	0.0	0.0	0.0
01/26/99	2.9	0.0	0.0
09/07/01	6.0	0.8	0.0
Min	0.0	0.0	0.0
Max	6.2	0.8	0.0
Average	2.5	0.1	0.0

GCP11S			
Date	PCE	TCE	cis-1,2-DCE
01/03/92	23.6	0.6	0.0
06/04/98	0.0	0.0	0.0
09/07/01	0.0	3.0	0.0
Min	0.0	0.0	0.0
Max	23.6	3.0	0.0
Average	8.9	1.2	0.0

All values are in ug/l.
0.0 = Not detected at the limit of detection.
Values in blue text are for total 1,2 dichloroethene.
ERM

Table 2
Summary of Historic Ground Water Monitoring Well Sample Results for Select Predominant Compounds
150 Fulton Avenue, Garden City Park, New York

ERM

GCP12S			
Date	PCE	TCE	cis-1,2-DCE
01/08/92	62.0	0.8	0.0
08/04/99	0.0	0.0	0.0
09/17/01	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	62.0	0.8	0.0
Average	20.7	0.3	0.0

GCP12D			
Date	PCE	TCE	cis-1,2-DCE
01/08/92	144.0	55.7	9.0
08/10/98	71.6	51.7	0.0
05/11/00	59.4	60.6	0.0
09/17/01	10.0	11.0	0.0
Min	10.0	11.0	0.0
Max	144.0	60.6	9.0
Average	71.3	44.8	2.3

GCP13S			
Date	PCE	TCE	cis-1,2-DCE
01/07/92	10.0	1.9	1.0
11/16/98	1.4	4.0	0.0
08/18/97	1.3	3.0	0.0
07/09/98	1.2	2.4	0.0
09/10/01	0.6	1.0	0.0
Min	0.6	1.0	0.0
Max	10.0	4.0	1.0
Average	2.9	2.5	0.2

GCP13D			
Date	PCE	TCE	cis-1,2-DCE
01/07/92	55.6	105.0	1.7
06/10/98	24.0	42.6	0.9
05/11/00	13.0	0.0	0.0
09/10/01	10.0	17.0	0.4
Min	10.0	0.0	0.0
Max	55.6	105.0	1.7
Average	26.0	41.2	0.5

GCP14S			
Date	PCE	TCE	cis-1,2-DCE
01/07/92	23.0	0.0	0.0
12/08/98	0.0	0.0	0.0
09/28/01	0.0	0.0	0.0
03/04/15	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	23.0	0.0	0.0
Average	6.0	0.0	0.0

GCP14D			
Date	PCE	TCE	cis-1,2-DCE
01/07/92	152.0	4.7	1.7
12/23/98	0.0	0.0	0.0
09/28/01	37.0	16.0	1.0
03/04/15	8.9	0.4	0.0
Min	0.0	0.0	0.0
Max	152.0	16.0	1.7
Average	49.5	5.3	0.7

GCP15S			
Date	PCE	TCE	cis-1,2-DCE
01/08/92	18.5	0.2	0.0
12/23/98	0.0	0.0	0.0
09/28/01	0.0	0.0	0.0
05/21/03	0.0	0.0	0.0
05/21/03	0.1	0.0	0.0
08/13/03	1.0	0.0	0.0
12/16/03	0.3	0.0	0.0
05/07/04	0.0	0.0	0.0
12/09/04	0.4	0.0	0.0
05/17/05	2.0	0.0	0.0
11/03/05	2.0	0.2	0.0
05/31/06	0.0	0.0	0.0
12/21/06	0.0	0.0	0.0
12/19/08	0.0	0.0	0.0
11/11/11	0.0	0.0	0.0
03/03/15	0.0	0.0	0.0
05/05/15	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	18.5	0.2	0.0
Average	1.4	0.0	0.0

MW15A			
Date	PCE	TCE	cis-1,2-DCE
07/20/01	12.0	2.0	8.0
09/28/01	5.0	0.6	0.4
10/03/01	22.0	2.0	4.0
05/21/03	72.0	9.0	4.0
08/11/03	400.0	57.0	18.0
12/16/03	2.0	0.0	0.2
05/07/04	220.0	23.0	7.0
12/09/04	1,100.0	120.0	33.0
05/17/05	1,400.0	180.0	54.0
11/02/05	2,900.0	240.0	89.0
05/31/06	1,880.0	173.0	56.2
12/21/06	2,390.0	162.0	78.6
12/19/08	1,440.0	85.2	76.0
11/11/11	1,120.0	51.9	50.3
03/04/15	243.0	16.2	13.6
05/05/15	399.0	21.8	21.9
Min	2.0	0.0	0.2
Max	2,390.0	240.0	78.6
Average	794.1	73.4	30.9

MW15B			
Date	PCE	TCE	cis-1,2-DCE
07/20/01	1,500.0	87.0	9.0
09/28/01	88.0	9.0	0.8
10/03/01	1,200.0	65.0	9.0
05/21/03	680.0	68.0	60.0
08/11/03	560.0	50.0	5.0
12/16/03	440.0	54.0	4.0
05/07/04	470.0	56.0	4.0
12/09/04	150.0	40.0	4.0
05/17/05	310.0	54.0	5.0
11/02/05	250.0	39.0	3.5
05/31/06	251.0	37.4	3.1
12/21/06	293.0	37.7	3.1
12/19/08	174.0	23.7	1.8
11/11/11	185.0	15.0	2.5
03/03/15	0.6	0.0	0.0
05/05/15	87.4	4.8	0.5
Min	0.6	0.0	0.0
Max	1,500.0	87.0	60.0
Average	413.7	42.5	9.5

GCP16S			
Date	PCE	TCE	cis-1,2-DCE
01/13/92	9.2	25.3	0.7
04/26/94	0.0	0.0	0.0
11/26/96	0.7	0.8	0.0
09/06/01	1.0	10.0	8.0
Min	0.0	0.0	0.0
Max	9.2	25.3	8.0
Average	2.7	9.0	2.2

GCP17S			
Date	PCE	TCE	cis-1,2-DCE
06/22/95	5,600.0	0.0	0.0
06/18/98	2,000.0	54.0	0.0
09/09/98	29,000.0	600.0	58.0
10/04/01	21.0	10.0	12.0
12/16/11	1.4	0.0	0.0
Min	1.4	0.0	0.0
Max	29,000.0	600.0	58.0
Average	7,324.5	128.8	14.0

GCP17D			
Date	PCE	TCE	cis-1,2-DCE
06/22/95	7,100.0	0.0	0.0
09/09/98	53.0	1.0	0.0
10/01/01	4.0	0.2	0.3
12/15/11	0.4	0.0	0.0
Min	0.4	0.0	0.0
Max	7,100.0	1.0	0.3
Average	1,789.4	0.3	0.1

GCP18S			
Date	PCE	TCE	cis-1,2-DCE
06/17/95	780.0	330.0	3,700.0
06/18/95	850.0	280.0	2,000.0
09/09/98	1,100.0	280.0	6,300.0
09/19/01	220.0	66.0	781.0
08/14/03	52.0	28.0	3,200.0
12/16/03	42.0	0.0	2,300.0
05/10/04	22.0	0.0	3,100.0
12/08/04	18.0	1.0	40.0
05/18/05	0.0	0.0	2,600.0
11/03/05	120.0	76.0	950.0
05/07/06	2.8	0.0	1.1
12/22/06	69.8	4.5	178.0
12/18/08	53.6	13.4	292.0
11/14/11	2.0	0.0	0.8
12/16/11	2.5	0.0	0.9
05/07/15	1.5	0.8	6.1
Min	0.0	0.0	0.8
Max	1,100.0	330.0	6,300.0
Average	208.5	66.2	1,578.1

GCP18D			
Date	PCE	TCE	cis-1,2-DCE
06/17/95	4.2	0.0	4.2
09/09/98	0.0	0.0	0.0
09/19/01	2.0	0.5	0.4
08/14/03	7.0	0.0	0.0
12/16/03	5.0	0.0	0.0
05/10/04	1.0	0.0	0.0
12/08/04	0.3	0.0	0.0
05/18/05	1.0	0.0	0.0
11/03/05	0.4	0.0	0.0
05/07/06	2.3	0.0	0.0
12/22/06	0.0	0.0	0.0
12/18/08	0.7	0.0	0.0
11/14/11	0.0	0.0	0.4
05/07/15	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	7.0	0.5	4.2
Average	1.7	0.0	0.4

GCP19S			
Date	PCE	TCE	cis-1,2-DCE
06/17/95	7,900.0	0.0	0.0
06/18/98	2,100.0	23.0	0.0
01/12/99	233.0	28.1	3.9
09/07/00	17.6	2.8	0.3
09/19/01	6.0	41.0	1.0
11/16/11	1.1	0.0	0.3
Min	1.1	0.0	0.0
Max	7,900.0	41.0	3.9
Average	1,708.0	15.8	0.9

MW20A			
Date	PCE	TCE	cis-1,2-DCE
04/24/01	0.0	0.0	0.0
09/18/01	0.0	0.0	0.0
04/30/15	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	0.0	0.0	0.0
Average	0.0	0.0	0.0

MW20B			
Date	PCE	TCE	cis-1,2-DCE
05/15/01	0.0	34.0	0.3
09/18/01	0.0	12.0	0.0
04/30/15	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	0.0	34.0	0.3
Average	0.0	15.3	0.1

MW20C			
Date	PCE	TCE	cis-1,2-DCE
05/14/01	0.0	0.0	0.0
09/18/01	0.0	0.0	0.0
04/30/15	0.5	1.1	0.0
Min	0.0	0.0	0.0
Max	0.5	1.1	0.0
Average	0.2	0.4	0.0

MW21A			
Date	PCE	TCE	cis-1,2-DCE
05/29/01	4.0	0.9	0.0
09/24/01	9.0	0.2	0.0
05/22/03	14.0	0.0	0.0
08/14/03	18.0	0.0	0.0
12/15/03	18.0	0.3	0.0
12/19/03	14.0	0.0	0.0
05/06/04	6.0	0.0	0.0
12/07/04	15.0	0.0	0.0
05/13/05	12.0	0.0	0.0
11/01/05	4.0	0.0	0.0
05/01/06	10.3	0.0	0.0
12/20/06	5.7	0.0	0.0
08/21/07	9.3	0.0	0.0
12/15/08	3.8	0.0	0.0
09/02/09	1.9	0.0	0.0
01/05/10	1.3	0.0	0.0
05/12/10	0.8	0.0	0.0
10/29/10	0.9	0.0	0.0
11/09/11	0.6	0.0	0.0
03/05/15	0.0	0.0	0.0
05/01/15	0.5	0.0	0.0
Min	0.0	0.0	0.0
Max	18.0	0.9	0.0
Average	7.1	0.1	0.0

MW21B			
Date	PCE	TCE	cis-1,2-DCE
05/28/01	200.0	42.0	0.3
09/24/01	16.0	4.0	0.0
05/22/03	490.0	32.0	0.0
08/12/03	490.0	29.0	0.0
12/15/03	860.0	25.0	0.0
05/06/04	2,200.0	21.0	0.0
12/07/04	1,500.0	37.0	0.0
05/13/05	1,900.0	36.0	0.0
11/04/05	1,000.0	43.0	4.0
05/01/06	1,130.0	63.5	2.7
12/20/06	1,640.0	109.0	6.8
08/21/07	2,310.0	97.7	1.9
12/15/08	2,370.0	164.0	9.0
09/02/09	2,580.0	268.0	14.1
01/05/10	1,670.0	193.0	21.1
05/12/10	2,570.0	217.0	22.8
10/29/10	2,380.0	268.0	24.8
11/09/11	1,230.0	80.7	21.5
03/05/15	1.5	1.1	0.5
05/01/15	1,470.0	154.0	14.5
Min	1.5	1.1	0.0
Max	2,570.0	217.0	24.8
Average	1,354.4	87.8	7.2

MW21C			
Date	PCE	TCE	cis-1,2-DCE
07/19/01	290.0	1.0	0.0
09/24/01	27.0	1.0	0.0
05/22/03	1,600.0	0.0	0.0
08/12/03	1,600.0	8.0	0.0
12/15/03	350.0	4.0	0.0
05/06/04	1,000.0	5.0	8.0
12/07/04	1,200.0	9.0	0.0
05/13/05	3,100.0	21.0	0.0
11/01/05	260.0	9.0	9.0
05/01/06	3,330.0	28.7	7.4
12/20/06	2,410.0	32.4	18.0
08/21/07	9.6	0.2	1.0
12/15/08	2,820.0	53.1	9.4
09/02/09	2,620.0	64.6	10.9
01/05/10	422.0	25.5	12.3
05/12/10	2,230.0	78.9	8.5
10/29/10	454.0	12.4	4.0
11/09/11	850.0	48.4	7.3
03/05/15	1.3	0.0	0.0
05/01/15	318	18.8	2.3
Min	1.3	0.0	0.0
Max	3,330.0	64.6	18.0
Average	1,254.6	22.1	4.9

0.0 = Not detected at the limit of detection.
Values in blue text are for total 1,2-dichloroethene.
ERM

Table 2
Summary of Historic Ground Water Monitoring Well Sample Results for Select Predominant Compounds
150 Fulton Avenue, Garden City Park, New York

ERM

MW22A			
Date	PCE	TCE	cis-1,2-DCE
05/15/01	1.9	0.0	0.0
09/21/01	3.0	0.0	0.0
05/08/15	0.7	0.0	0.0
Min	0.7	0.0	0.0
Max	3.0	0.0	0.0
Average	1.6	0.0	0.0

MW22B			
Date	PCE	TCE	cis-1,2-DCE
05/16/01	1.0	0.0	0.0
09/21/01	0.6	0.0	0.0
10/04/01	0.9	0.0	0.0
05/04/15	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	1.0	0.0	0.0
Average	0.6	0.0	0.0

MW22C			
Date	PCE	TCE	cis-1,2-DCE
05/16/01	0.4	0.0	0.0
09/21/01	0.5	0.4	0.0
05/04/15	0.2	0.0	0.0
Min	0.2	0.0	0.0
Max	0.5	0.4	0.0
Average	0.4	0.1	0.0

MW23A			
Date	PCE	TCE	cis-1,2-DCE
04/24/01	0.4	2.0	0.0
09/20/01	0.7	0.0	0.0
05/05/04	0.0	6.0	0.0
12/06/04	0.0	0.0	0.0
05/18/05	2.0	9.0	0.0
10/31/05	0.0	4.0	0.0
06/06/06	0.0	5.5	0.0
12/20/06	0.0	4.0	0.0
06/22/07	0.0	5.7	0.0
12/22/08	0.0	0.5	0.0
11/10/11	0.0	0.0	0.0
04/30/15	0.0	0.3	0.0
Min	0.0	0.0	0.0
Max	2.0	9.0	0.0
Average	0.3	3.1	0.0

MW23B			
Date	PCE	TCE	cis-1,2-DCE
04/24/01	23.0	210.0	0.0
09/20/01	3.0	21.0	0.2
12/13/04	8.0	79.0	0.0
05/18/05	2.0	11.0	2.0
11/02/05	12.0	170.0	0.0
06/06/06	12.3	191.0	0.36
06/06/06	12.3	179.0	0.36
06/22/07	11.3	102.0	0.0
12/22/08	8.4	137.0	0.3
11/10/11	6.0	96.6	0.5
05/04/15	3.5	37.2	0.3
Min	2.0	11.0	0.0
Max	23.0	210.0	2.0
Average	9.3	112.2	0.4

MW23C			
Date	PCE	TCE	cis-1,2-DCE
07/23/01	15.0	35.0	0.5
09/20/01	3.0	4.0	0.0
05/05/04	38.0	240.0	4.0
12/06/04	30.0	160.0	1.0
05/18/05	38.0	260.0	2.0
10/31/05	28.0	130.0	1.0
06/06/06	21.1	120.0	1.0
12/19/06	37.3	183.0	1.3
06/22/07	48.3	204.0	1.1
12/22/08	20.7	150.0	0.8
11/10/11	6.2	89.3	0.8
04/30/15	4.8	39.6	0.5
Min	3.0	4.0	0.0
Max	48.3	260.0	4.0
Average	24.4	137.1	1.2

MW23D			
Date	PCE	TCE	cis-1,2-DCE
07/23/01	0.5	10.0	0.0
09/20/01	0.0	0.4	0.0
05/05/04	2.0	8.0	0.0
12/06/04	0.4	3.0	0.0
05/18/05	2.0	8.0	0.0
11/02/05	0.0	0.0	0.0
06/06/06	10.5	62.9	0.0
12/19/06	9.9	51.1	0.55
06/22/07	1.5	10.5	0.00
12/22/08	6.8	73.2	0.36
11/10/11	9.7	92.0	0.79
05/04/15	9.4	84.1	0.63
Min	0.0	0.0	0.0
Max	10.5	92.0	0.8
Average	4.4	33.6	0.2

MW24A			
Date	PCE	TCE	cis-1,2-DCE
08/13/01	24.0	39.0	0.6
09/25/01	0.5	0.2	0.0
05/01/15	12.1	81.2	1.3
Min	0.5	0.2	0.0
Max	24.0	81.2	1.3
Average	12.2	40.1	0.6

MW24B			
Date	PCE	TCE	cis-1,2-DCE
08/14/01	5.0	6.0	0.0
09/25/01	21.0	39.0	0.6
05/01/15	4.8	5.8	0.2
Min	4.8	5.8	0.0
Max	21.0	39.0	0.6
Average	10.3	16.9	0.3

MW25A			
Date	PCE	TCE	cis-1,2-DCE
07/19/01	77.0	96.0	2.0
09/27/01	62.0	82.0	2.0
05/06/15	13.9	19.3	1.5
Min	13.9	19.3	1.5
Max	77.0	96.0	2.0
Average	51.0	65.8	1.8

M6			
Date	PCE	TCE	cis-1,2-DCE
05/22/89	24.4	89.4	0.0
06/16/89	33.2	88.3	0.0
07/11/90	41.4	99.0	0.6
08/20/90	70.6	119.0	1.9
04/18/91	37.7	93.7	0.0
01/15/92	23.0	67.6	0.8
05/20/92	42.2	261.0	1.2
07/06/93	32.2	103.0	1.3
11/02/94	55.4	92.7	1.0
02/06/97	0.0	0.0	0.0
06/03/98	1.5	2.5	0.0
09/27/01	10.0	14.0	0.2
05/05/15	1.3	1.1	0.0
Min	0.0	0.0	0.0
Max	70.6	261.0	1.9
Average	28.7	79.3	0.5

M5			
Date	PCE	TCE	cis-1,2-DCE
05/22/89	0.0	0.0	0.0
06/16/89	0.0	0.7	0.0
07/11/90	0.0	0.0	0.0
08/20/90	0.0	0.0	0.0
04/18/91	0.0	0.0	0.0
05/20/92	0.0	0.0	0.0
07/06/93	0.0	0.0	0.0
08/12/94	0.0	0.0	0.0
02/06/97	0.0	0.0	0.0
06/03/98	0.0	0.0	0.0
09/27/01	0.0	0.0	0.0
05/05/15	0.3	0.0	0.0
Min	0.0	0.0	0.0
Max	0.3	0.7	0.0
Average	0.0	0.1	0.0

MW29A			
Date	PCE	TCE	cis-1,2-DCE
05/04/04	0.0	0.0	0.0
12/03/04	0.0	0.0	0.0
05/16/05	0.0	0.0	0.0
10/31/05	0.0	0.0	0.0
06/06/06	0.0	0.0	0.0
12/18/06	0.0	0.0	0.0
06/20/07	0.0	0.0	0.0
12/17/08	0.0	0.0	0.0
08/31/09	0.0	0.0	0.0
01/07/10	0.0	0.0	0.0
05/10/10	0.0	0.0	0.0
11/07/11	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	0.0	0.0	0.0
Average	0.0	0.0	0.0

MW29B			
Date	PCE	TCE	cis-1,2-DCE
05/04/04	0.0	0.0	0.0
12/03/04	0.0	0.0	0.0
05/16/05	0.0	0.0	0.0
10/31/05	0.0	0.0	0.0
06/06/06	0.0	0.0	0.0
12/18/06	0.0	0.0	0.0
06/20/07	0.0	0.0	0.0
12/17/08	0.0	0.0	0.0
08/31/09	0.0	0.0	0.0
01/07/10	0.0	0.0	0.0
05/10/10	0.0	0.0	0.0
11/07/11	0.0	0.0	0.0
05/05/15	0.4	0.0	0.0
Min	0.0	0.0	0.0
Max	0.4	0.0	0.0
Average	0.0	0.0	0.0

MW26C			
Date	PCE	TCE	cis-1,2-DCE
05/04/04	0.0	0.0	0.0
12/03/04	0.0	0.0	0.0
05/16/05	0.0	0.0	0.0
10/31/05	0.0	0.0	0.0
06/06/06	0.0	0.0	0.0
12/18/06	0.0	0.0	0.0
06/20/07	0.0	0.0	0.0
12/17/08	0.0	0.0	0.0
08/31/09	0.0	0.0	0.0
01/07/10	0.0	0.0	0.0
05/10/10	0.0	0.0	0.0
11/07/11	0.0	0.0	0.0
05/05/15	0.4	0.0	0.0
Min	0.0	0.0	0.0
Max	0.4	0.0	0.0
Average	0.0	0.0	0.0

MW26D			
Date	PCE	TCE	cis-1,2-DCE
05/04/04	0.0	0.0	0.0
12/03/04	0.0	0.0	0.0
05/16/05	0.0	0.0	0.0
10/31/05	0.0	0.0	0.0
06/06/06	0.0	0.0	0.0
12/18/06	0.0	0.0	0.0
06/20/07	0.0	0.0	0.0
12/17/08	1.0	0.0	0.0
08/31/09	0.54	0.0	0.0
01/07/10	0.00	0.64	0.0
05/10/10	0.00	1.8	0.0
11/07/11	0.52	0.3	0.0
03/09/15	3.50	0.7	0.2
05/06/15	2.30	0.8	0.5
Min	0.0	0.0	0.0
Max	3.5	1.80	0.5
Average	0.6	0.3	0.0

MW26E			
Date	PCE	TCE	cis-1,2-DCE
05/03/04	0.0	0.0	0.0
12/03/04	0.0	0.0	0.0
05/16/05	0.0	0.0	0.0
10/31/05	0.0	0.0	0.0
06/05/06	0.0	0.86	0.0
12/18/06	0.0	0.00	0.0
06/20/07	0.0	0.85	0.0
12/17/08	0.0	0.94	0.0
08/31/09	0.61	2.20	0.0
01/07/10	2.0	4.4	0.0
05/10/10	3.8	7.7	0.0
11/07/11	12.5	7.0	2.2
03/09/15	24.1	6.3	1.8
05/06/15	15.1	7.4	2.1
Min	0.0	0.0	0.0
Max	24.1	6.3	2.2
Average	4.2	2.8	0.4

MW26F			
Date	PCE	TCE	cis-1,2-DCE
05/03/04	0.0	0.0	0.0
12/03/04	0.4	4.0	0.6
05/16/05	0.9	10.0	1.0
10/31/05	1.0	10.0	0.8
06/05/06	4.3	32.8	2.4
12/18/06	3.5	23.5	1.4
06/20/07	0.42	6.0	1.1
12/17/08	0.57	4.6	0.9
08/31/09	0.55	3.4	0.7
01/07/10	0.0	2.5	1.5
05/10/10	0.4	3.0	0.0
11/07/11	4.7	3.9	3.1
03/09/15	42.0	16.3	6.0
05/06/15	30.9	12.5	7.6
Min	0.0	0.0	0.0
Max	42.0	32.8	7.6
Average	6.4	9.0	1.9

MW26G			
Date	PCE	TCE	cis-1,2-DCE
05/03/04	5.0	30.0	0.0
12/03/04	5.0	36.0	0.4
05/16/05	9.0	72.0	0.8
10/31/05	6.0	42.0	0.4
06/05/06	8.4	53.2	0.57
12/18/06	4.9	31.7	0.0
06/20/07	0.52	4.2	0.0
12/17/08	2.2	15.1	0.3
08/31/09	5.1	21.2	0.89
01/07/10	6.1	21.6	1.4
05/10/10	7.0	19.9	1.9
11/07/11	11.7	24.3	3.8
03/09/15	13.1	34.9	1.2
05/06/15	8.4	37.7	1.2
Min	0.5	4.2	0.0
Max	13.1	72.0	3.8
Average	6.6	31.6	0.9

MW26H			
Date	PCE	TCE	cis-1,2-DCE
05/03/04	0.0	0.0	0.0
12/03/04	0.0	0.0	0.0
05/16/05	0.0	0.0	0.0
10/31/05	0.0	0.0	0.0
06/05/06	0.0	0.0	0.0
12/18/06	0.0	0.0	0.0
06/20/07	0.0	0.0	0.0
12/17/08	0.0	0.0	0.0
08/31/09	0.0	0.0	0.0
01/07/10	0.0	0.64	0.0
05/10/10	0.0	1.7	0.0
11/07/11	0.5	9.9	0.5
03/09/15	1.9	22.7	0.2
05/06/15	1.5	18.2	0.3
Min	0.0	0.0	0.0
Max	1.9	22.7	0.5
Average	0.3	3.8	0.1

MW27A			
Date	PCE	TCE	cis-1,2-DCE
05/03/04	0.0	0.0	0.0
12/02/04	0.0	0.0	0.0
05/12/05	0.0	0.0	0.0
11/01/05	0.0	0.0	0.0
05/02/06	0.0	0.0	0.0
12/15/06	0.0	0.0	0.0
06/23/07	0.0	0.0	0.0
12/16/08	0.0	0.0	0.0
09/01/09	0.0	0.0	0.0
01/06/10	0.0	0.0	0.0
05/11/10	0.0	0.0	0.0
11/07/11	0.0	0.0	0.0
05/07/15	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	0.0	0.0	0.0
Average	0.0	0.0	0.0

All values are in ug/l.
0.0 = Not detected at the limit of detection.
Values in blue text are for total 1,2 dichloroethene.
ERM

Table 2
Summary of Historic Ground Water Monitoring Well Sample Results for Select Predominant Compounds
150 Fulton Avenue, Garden City Park, New York

ERM

MW27B			
Date	PCE	TCE	cis-1,2-DCE
05/03/04	0.0	0.0	0.0
12/02/04	0.0	0.0	0.0
05/12/05	0.0	0.0	0.0
11/1/2005	0.0	0.0	0.0
06/02/06	0.0	0.0	0.0
12/15/06	0.0	0.0	0.0
08/23/07	0.0	0.0	0.0
12/16/08	0.0	0.0	0.0
09/01/09	0.0	0.0	0.0
01/06/10	0.0	0.0	0.0
05/11/10	0.0	0.0	0.0
12/20/11	0.0	0.0	0.0
05/07/15	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	0.0	0.0	0.0
Average	0.0	0.0	0.0

MW27C			
Date	PCE	TCE	cis-1,2-DCE
05/03/04	0.0	0.0	0.0
12/02/04	0.0	0.0	0.0
05/12/05	0.0	0.0	0.0
11/1/2005	0.0	0.0	0.0
06/02/06	0.0	0.0	0.0
12/15/06	0.0	0.0	0.0
08/23/07	0.0	0.0	0.0
12/16/08	0.0	0.0	0.0
09/01/09	0.0	0.0	0.0
01/06/10	0.0	0.0	0.0
05/11/10	0.0	0.0	0.0
12/20/11	0.0	0.0	0.0
05/07/15	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	0.0	0.0	0.0
Average	0.0	0.0	0.0

MW27D			
Date	PCE	TCE	cis-1,2-DCE
05/03/04	0.0	0.0	0.0
12/02/04	0.0	0.0	0.0
05/12/05	0.0	0.0	0.0
11/1/2005	0.0	0.0	0.0
06/02/06	0.0	0.0	0.0
12/15/06	0.0	0.0	0.0
08/23/07	0.0	0.0	0.0
12/16/08	0.0	0.0	0.0
09/01/09	0.0	0.0	0.0
01/06/10	0.0	0.0	0.0
05/11/10	0.0	0.0	0.0
11/08/11	0.0	0.0	0.0
05/07/15	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	0.0	0.0	0.0
Average	0.0	0.0	0.0

MW27E			
Date	PCE	TCE	cis-1,2-DCE
05/03/04	0.0	0.0	0.0
12/02/04	0.0	0.0	0.0
05/12/05	0.0	0.0	0.0
11/1/2005	0.0	0.0	0.0
06/02/06	0.0	0.0	0.0
12/15/06	0.0	0.0	0.0
08/23/07	0.0	0.0	0.0
12/16/08	0.0	0.0	0.0
09/01/09	0.0	0.0	0.0
01/06/10	0.0	0.0	0.0
05/11/10	0.0	0.0	0.0
11/08/11	0.0	0.0	0.0
05/07/15	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	0.0	0.0	0.0
Average	0.0	0.0	0.0

MW27F			
Date	PCE	TCE	cis-1,2-DCE
05/03/04	0.0	0.0	0.0
12/02/04	0.0	0.0	0.0
05/12/05	0.0	0.0	0.0
11/1/2005	0.0	0.0	0.0
06/02/06	0.0	0.0	0.0
12/15/06	0.0	0.0	0.0
08/23/07	0.0	0.0	0.0
12/16/08	0.0	0.0	0.0
09/01/09	0.0	0.0	0.0
01/06/10	0.0	0.0	0.0
05/11/10	0.0	0.0	0.0
11/08/11	0.0	0.0	0.0
05/07/15	0.0	0.0	0.0
Min	0.0	0.0	0.0
Max	0.0	0.0	0.0
Average	0.0	0.0	0.0

MW27G			
Date	PCE	TCE	cis-1,2-DCE
05/03/04	0.0	0.0	0.0
12/02/04	0.0	0.0	0.0
05/12/05	0.0	0.0	0.0
11/1/2005	0.0	0.4	0.0
06/02/06	0.0	0.0	0.0
12/15/06	0.0	1.8	0.0
08/23/07	0.0	0.0	0.0
12/16/08	0.4	4.2	0.0
09/01/09	0.97	8.4	
01/06/10	0.0	4.1	0.0
05/11/10	0.0	1.9	0.0
11/08/11	0.3	2.5	0.0
03/09/15	1.5	2.5	0.0
05/07/15	1.0	1.1	0.0
Min	0.0	0.0	0.0
Max	1.5	8.4	0.0
Average	0.3	1.9	0.0

MW27H			
Date	PCE	TCE	cis-1,2-DCE
05/03/04	0.0	0.0	0.0
12/02/04	0.0	0.0	0.0
05/12/05	0.0	0.0	0.0
11/1/2005	0.0	0.0	0.0
06/02/06	0.0	0.0	0.0
12/15/06	0.0	0.0	0.0
08/23/07	0.0	0.0	0.0
12/16/08	0.0	0.0	0.0
09/01/09	0.0	0.0	0.0
01/06/10	0.0	0.0	0.0
05/11/10	0.0	0.0	0.0
11/08/11	0.0	1.0	0.0
03/09/15	0.3	1.5	0.7
05/07/15	0.0	0.9	1.6
Min	0.0	0.0	0.0
Max	0.3	1.5	1.6
Average	0.0	0.2	0.2

E9B			
Date	PCE	TCE	cis-1,2-DCE
07/17/86	20.4	36.3	0.0
02/04/87	15.3	18.1	0.0
07/29/88	0.0	0.0	0.0
07/21/89	8.0	0.0	0.0
10/13/89	1.8	0.4	0.0
08/21/90	3.1	1.5	0.0
08/24/91	0.0	0.0	0.0
01/09/92	14.4	1.1	0.0
01/06/93	2.9	1.3	0.0
07/28/94	1.8	0.4	0.0
02/25/97	3.2	0.0	0.0
09/12/01	2.0	0.4	0.4
Min	0.0	0.0	0.0
Max	20.4	36.3	0.4
Average	6.1	5.0	0.0

M51			
Date	PCE	TCE	cis-1,2-DCE
10/22/93	0.0	4.6	0.0
08/15/94	0.2	12.2	0.5
03/03/99	0.0	7.6	0.0
09/25/01	0.0	8.0	0.0
Min	0.0	4.6	0.0
Max	0.2	12.2	0.5
Average	0.1	7.6	0.1

M52			
Date	PCE	TCE	cis-1,2-DCE
10/22/93	0.0	0.0	0.0
08/15/94	2.9	0.0	1.1
02/25/97	1.9	0.0	0.0
09/25/01	0.7	0.3	0.0
Min	0.0	0.0	0.0
Max	2.9	0.3	1.1
Average	1.4	0.1	0.3

N-0222T			
Date	PCE	TCE	cis-1,2-DCE
09/17/01	10.0	4.0	0.1
Min	10.0	4.0	0.1
Max	10.0	4.0	0.1
Average	10.0	4.0	0.1

VOW1D			
Date	PCE	TCE	cis-1,2-DCE
4/28/99	111.0	7.0	0.0
7/14/99	47.8	8.1	0.0
10/28/99	0.6	0.0	0.0
6/7/00	0.7	0.0	0.0
3/19/01	0.0	0.0	0.0
6/14/01	0.0	0.0	0.0
11/15/11	1.6	0.0	0.0
Min	0.0	0.0	0.0
Max	111.0	8.1	0.0
Average	23.1	2.2	0.0

VOW3D			
Date	PCE	TCE	cis-1,2-DCE
4/28/99	22200.0	224.0	1.8
7/14/99	11700.0	2410.0	0.0
10/28/99	705.0	745.0	50.1
6/7/00	99.1	87.7	12.7
9/29/00	27.6	26.7	1.0
3/19/01	64.2	18.9	28.8
6/14/01	4.9	3.3	0.0
11/15/11	1.6	0.0	0.0
12/15/11	1.2	0.0	0.0
Min	1.2	0.0	0.0
Max	22,200.0	2410.0	50.1
Average	3,887.1	390.6	10.5

VOW4D			
Date	PCE	TCE	cis-1,2-DCE
4/28/99	53700.0	0.0	0.0
7/14/99	38700.0	1040.0	0.0
10/28/99	8600.0	2600.0	401.0
1/24/00	2140.0	4580.0	1290.0
6/7/00	697.0	3640.0	2373.7
9/29/00	134.0	926.0	1562.0
1/3/01	55.8	929.0	1569.8
3/19/01	0.0	117.0	13243.7
6/14/01	1.6	2.5	19.4
9/5/01	6.3	10.0	5.0
11/15/11	2.9	0.4	0.0
12/15/11	1.8	0.4	0.0
12/16/11	1.9	0.4	0.0
Min	0.0	0.0	0.0
Max	53700.0	4580.0	13243.7
Average	7726.9	1042.1	1574.2

VEW1			
Date	PCE	TCE	cis-1,2-DCE
11/15/11	2.5	0.3	0.0
12/15/11	3.1	0.5	0.0
Min	2.5	0.3	0.0
Max	3.1	0.5	0.0
Average	2.8	0.4	0.0

All values are in ug/l.
0.0 = Not detected at the limit of detection.
Values in blue text are for total 1,2 dichloroethene.
ERM

TABLE 3
Summary of Contaminants of Concern and Medium-Specific Exposure Point Concentrations

Scenario Timeframe: Current/Future
Medium: Groundwater
Exposure Medium: Groundwater

Exposure Point	Chemical of Concern	Concentration Detected		Concentration Units	Frequency of Detection	Exposure Point Concentration (EPC)[1]	EPC Units	Statistical Measure
		Min	Max					
Tap Water and Shower Head	Tetrachloroethene (PCE)	6.6	360	µg/L	19/19	360	µg/L	Max (UCL > Max)[2]
	Trichloroethene (TCE)	37	120	µg/L	19/19	73	µg/L	95% UCL-T

Footnotes:
(1) For non-detects, 1/2 the detection limit was used as the proxy concentration when calculating the EPC.
(2) The calculated 95% UCL exceeded the maximum detected concentration, therefore the maximum concentration was used.

Definitions:
µg/L = Micrograms per liter
Max = maximum detected concentration
UCL = upper confidence limit of mean
T- transformed

Summary of Chemicals of Concern and Medium-Specific Exposure Point Concentrations

This table presents the chemicals of concern (COCs) and exposure point concentrations (EPCs) for each of the COCs detected in groundwater (*i.e.*, the concentration that will be used to estimate the exposure and risk from each COC). The table includes the range of concentrations detected for each COC, as well as the frequency of detection (i.e., the number of times the chemical was detected in the samples collected at the site), the EPC and how it was derived. The EPCs derived in the 2005 HHRA document were used for risk quantification in the 2015 risk memorandum.

TABLE 4
Selection of Exposure Pathways

Scenario Timeframe	Medium	Exposure Medium	Exposure Point	Receptor Population	Receptor Age	Exposure Route	Type of Analysis	Rationale for Selection or Exclusion of Exposure Pathway
Current/Future	Groundwater	Groundwater	Tapwater	Resident	Child (0-6 yr)	Ingestion	Quantitative	Selected to evaluate a real or hypothetical scenario in which an onsite private well is used for potable purposes or a municipal well is used without treatment.
						Dermal	Quantitative	
					Adult	Ingestion	Quantitative	
						Dermal	Quantitative	
				Off- Site Commercial Worker, South of RR	Adult	Ingestion	Quantitative	
			Vapors from Shower Head	Resident	Child (0-6 yr)	Inhalation	Quantitative	
					Adult	Inhalation	Quantitative	
			Indoor Air	Resident	Adult	Inhalation	Quantitative	Residential areas are located within the area of concern.
					Child (0-6 yr)	Inhalation	Quantitative	
				On-Site Commercial Worker	Adult	Inhalation	Quantitative	The site is used for commercial purposes.
				Off-Site Commercial Worker, North of RR	Adult	Inhalation	Quantitative	Commercial properties are located within the area of concern.
Future	Groundwater	Groundwater	Vapors from Irrigation Holding Pond	Landscaper, South of RR	Adult	Inhalation	Quantitative	Contaminated groundwater could potentially reach the golf course monitoring well and exposure could occur via volatilization from the water.

Summary of Selection of Exposure Pathways

This table describes the exposure pathways associated with groundwater that was evaluated in the original 2005 HHRA, and the rationale for the inclusion of each pathway. Exposure media, exposure points, and characteristics of each receptor populations are included. In August 2015, EPA conducted a Supplemental Risk Evaluation for the residential receptor at the Site; the resultant toxicity information and recalculated risk estimates for the resident are summarized in Tables 5 through 8.

TABLE 5
Cancer Toxicity Data Summary

Pathway: Oral/ Dermal

Chemical of Concern	Oral Cancer Slope Factor	Units	Absorbed Cancer Slope Factor for Dermal	Units	Weight of Evidence/ Cancer Guideline Description(1)	Source	Date
Tetrachloroethene (PCE)	2.1E-03	$(mg/kg\text{-}day)^{-1}$	2.1E-03	$(mg/kg\text{-}day)^{-1}$	likely to be carcinogenic to humans	IRIS	2/10/2012
Trichloroethene(2) (TCE)	4.6E-02	$(mg/kg\text{-}day)^{-1}$	4.6E-02	$(mg/kg\text{-}day)^{-1}$	carcinogenic to humans	IRIS	9/28/2011

Pathway: Inhalation

Chemical of Concern	Inhalation Unit Risk	Units	Inhalation Cancer Slope Factor	Units	Weight of Evidence/ Cancer Guideline Description(1)	Source	Date
Tetrachloroethene (PCE)	2.6E-07	$(\mu g/m^3)^{-1}$	NA	NA	likely to be carcinogenic to humans	IRIS	2/10/2012
Trichloroethene(3) (TCE)	4.1E-06	$(\mu g/m^3)^{-1}$	NA	NA	carcinogenic to humans	IRIS	9/28/2011

Footnotes:
(1) EPA Weight of Evidence (EPA, 2005):
"Carcinogenic to Humans": based on strong evidence of human carcinogenicity
"Likely to Be Carcinogenic to Humans": based on adequate carcinogenic potential to humans
(2) The slope factor is adult-based. TCE is carcinogenic by a mutagenic mode of action for induction of kidney tumors. The kidney lifetime oral slope factor is $9.3x10^{-3}$ $(mg/kg\text{-}day)^{-1}$.
(3) The inhalation unit risk is adult-based. TCE is carcinogenic by a mutagenic mode of action for induction of kidney tumors. The kidney lifetime unit risk is $1.0x10^{-6}$ per $\mu g/m^3$.

Definitions:
IRIS = Integrated Risk Information System
NA = Not available
$(\mu g/m^3)^{-1}$ = Per micrograms per cubic meter
$(mg/kg\text{-}day)^{-1}$ = Per milligrams per kilogram per day

Summary of Toxicity Assessment

This table provides carcinogenic risk information which is relevant to the contaminants of concern in groundwater. Toxicity data are provided for the ingestion, dermal and inhalation routes of exposure.

TABLE 6
Non-Cancer Toxicity Data Summary

Pathway: Oral/Dermal

Contaminants of Concern	Chronic/ Sub-chronic	Oral Reference Dose (RfD) Value	Oral RfD Units	Oral Absor-ption Efficiency for Dermal	Absorbed RfD for Dermal(1)	Adj. Dermal RfD Units	Primary Target Organ	Combined Uncertainty /Modifying Factors	Sources of RfD Target Organ	Dates of RfD
Tetrachloro-ethene (PCE)	Chronic	6.0E-03	mg/kg-day	100%	6.0E-03	mg/kg-day	Neurological	1,000	IRIS	2/10/2012
Trichloro-ethene (TCE)	Chronic	5.0E-04	mg/kg-day	100%	5.0E-04	mg/kg-day	Heart/Immune System/Developmental	10 to 1,000	IRIS	9/28/2011

Pathway: Inhalation

Contaminants of Concern	Chronic/ Sub-chronic	Inhalation RfC	Inhalation RfC Units	Primary Target Organ	Combined Uncertainty /Modifying Factors	Sources of RfC Target Organ	Dates of RfC
Tetrachloroethene (PCE)	Chronic	4.0E-02	mg/m^3	Neurological	100	IRIS	2/10/2012
Trichloroethene (TCE)	Chronic	2.0E-03	mg/m^3	Heart/Immune System	10 to 100	IRIS	9/28/2011

Footnotes:
(1) Adjusted RfD for Dermal = Oral RfD x Oral Absorption Efficiency for Dermal (RAGS E, 2004; EPA June 2015 RSL tables).

Definitions:
IRIS = Integrated Risk Information System
mg/m^3 = Milligrams per cubic meter
mg/kg-day = Milligrams per kilogram per day

Summary of Toxicity Assessment

This table provides non-carcinogenic risk information which is relevant to the contaminants of concern in groundwater. Toxicity data are provided for the ingestion, dermal and inhalation routes of exposure.

TABLE 7
Risk Characterization Summary - Carcinogens

Scenario Timeframe: Current/Future
Receptor Population: Resident
Receptor Age: Child/Adult

Medium	Exposure Medium	Exposure Point	Chemical Of Concern	Carcinogenic Risk			
				Ingestion	Dermal	Inhalation	Exposure Routes Total
Groundwater	Groundwater	Tap Water	Tetrachloroethylene (PCE)	9.70E-06	5.75E-06	1.67E-05	3.21E-05
			Trichloroethylene (TCE)	6.17E-05	1.02E-05	7.63E-05	1.48E-04
						Total Risk=	**1.80E-04**

Scenario Timeframe: Current/Future
Receptor Population: Commercial Worker Off-Site (South of RR)[1]
Receptor Age: Adult

Medium	Exposure Medium	Exposure Point	Chemical of Concern	Carcinogenic Risk			
				Ingestion	Dermal	Inhalation	Exposure Routes Total
Groundwater	Groundwater	Tap Water	Tetrachloroethene	6.8E-04	-----	-----	6.8E-04
						Total Risk[2]=	**6.8E-04**

Footnotes:
(1) The cancer risk estimates for the Off- Fulton Property Commercial Worker (south of the railroad tracks and to the east and west of the plume) were calculated using the toxicity information and assumptions as documented in the 2005 HHRA; more current toxicity information presented in preceding Table 6 was used for the current/future Resident calculations as documented in EPA's Supplemental Risk Evaluation Memorandum dated August 2015. Both risk documents are available in the Administrative record for the Site.
(2) Total Risks reflect the summed risks from the risk driving chemicals only (i.e., those that exceed the 1E-04 cancer risk level for this receptor); the cumulative risk from all COPCs for this receptor were equal to 7.8E-04 as documented in the 2005 HHRA.

Summary of Risk Characterization - Carcinogens

The table presents cancer risks for each route of exposure and for all routes of exposure combined. As stated in the National Contingency Plan, the acceptable risk range for site-related exposure is 10^{-6} to 10^{-4} (E-06 to E-04).

TABLE 8
Risk Characterization Summary - Non-Carcinogens

Scenario Timeframe: Current/Future
Receptor Population: Resident
Receptor Age: Child

Medium	Exposure Medium	Exposure Point	Chemical Of Concern	Primary Target Organ	Non-Carcinogenic Hazard Quotient			
					Ingestion	Dermal	Inhalation	Exposure Routes Total
Groundwater	Groundwater	Tap Water	Tetrachloroethylene (PCE)	Neurological	2.99	1.57	4.32	8.87
			Trichloroethylene (TCE)	Heart/ immune system/ developmental	7.28	1.06	17.5	25.8
							Groundwater Hazard Index Total=	**34.7**

Scenario Timeframe: Current/Future
Receptor Population: Resident
Receptor Age: Adult

Medium	Exposure Medium	Exposure Point	Chemical Of Concern	Primary Target Organ	Non-Carcinogenic Hazard Quotient			
					Ingestion	Dermal	Inhalation	Exposure Routes Total
Groundwater	Groundwater	Tap Water	Tetrachloroethylene (PCE)	Neurological	1.80	1.10	4.32	7.22
			Trichloroethylene (TCE)	Heart/ immune system/ developmental	4.38	0.748	17.5	22.6
							Groundwater Hazard Index Total=	**29.8**

Scenario Timeframe: Current/Future
Receptor Population: Commercial Worker Off-Site (South of RR)[1]
Receptor Age: Adult

Medium	Exposure Medium	Exposure Point	Chemical of Concern	Primary Target Organ	Non-Carcinogenic Hazard Quotient			
					Ingestion	Dermal	Inhalation	Exposure Routes Total
Groundwater	Groundwater	Tap Water	Trichloroethylene (TCE)	Liver	2.4	-----	-----	2.4
							Groundwater Hazard Index Total=	**2.4**

Footnotes:
(1) Non-cancer Hazard Quotient and Index estimates for the Off- Fulton Property Commercial Worker (south of the railroad tracks and to the east and west of the plume) were calculated using the toxicity information and assumptions as documented in the 2005 HHRA; more current toxicity information presented in preceding Table 5 was used for the current/future Resident calculations as documented in EPA's Supplemental Risk Evaluation Memorandum dated August 2015. Both risk documents are available in the Administrative record for the Site.

Summary of Risk Characterization - Non-Carcinogens

The table presents hazard quotients (HQs) for each route of exposure and the hazard index (sum of hazard quotients) for all routes of exposure. The Risk Assessment Guidance for Superfund states that, generally, a hazard index (HI) greater than 1 indicates the potential for adverse non-cancer effects.

Table 9

Cost Estimate for Fulton Avenue Superfund Site, First Operable Unit

Alternative GW-1: Continued Operation of Existing Treatment Systems on Village Wells 13 and 14

Capital Costs:

Public water supply protection and mitigation plan	$50,000
Monitoring well network maintenance/expansion	$150,000
Replacement of existing air strippers	$255,796
Vapor phase granular activated carbon units for air stripper discharge	$300,000
Total construction capital cost	**$755,796**
Engineering oversight @ 15%	$113,369
Project management @ 8%	$60,464
Construction management @ 10%	$75,580
Contingency @ 15%	$113,369
Total Construction Capital & Oversight	**$1,118,578**

O&M Costs:

Groundwater monitoring/reporting	$10,712
Periodic groundwater model simulation updating/reporting	$6,000
Labor, utilities, analytical for existing air strippers	$121,630
Vapor phase granular activated carbon change outs	$15,000
Subtotal Annual cost	**$153,342**
30 years, O&M present value @ 5% discount rate	$2,475,093
Project management @ 8%	$198,007
Contingency @ 10%	$247,509
Total present worth of O&M	**$2,920,610**
Total GW-1 Capital and O&M Cost	**$4,039,188**

Table 10

ARARs, TBCs, and Other Guidelines

Table 10a: Chemical-Specific Applicable or Relevant and Appropriate Requirements (ARARs); Advisories, Criteria and Guidance to be Considered (TBCs); and Other Guidelines

Statute/Regulation/Guideline	Citation	Requirement Synopsis
Safe Drinking Water Act, National Primary Drinking Water Standards	Safe Drinking Water Act (SDWA), 42 U.S.C. §§ 300f – 300j-26; 40 CFR Part 141	Establishes federal maximum contaminant levels (MCLs), which are enforceable standards for contaminants in water delivered to a user of a public water system. The MCLs for PCE and TCE are 5 parts per billion (ppb).
New York State Department of Health Drinking Water Regulations for Public Water Systems	10 NYCRR Part 5, Subpart 5-1 - Tables	Establishes state MCLs and monitoring requirements for contaminants in a public water system.
Resource Conservation and Recovery Act (RCRA) Identification and Listing of Hazardous Waste	42 U.S.C. §§ 6905, 6912, 6921-6922; 40 CFR Part 261	Part 261 identifies, among other things, those solid wastes which are subject to regulation as hazardous wastes under specified RCRA regulations, including 40 CFR Parts 262, 263, 264 and 268. Applicable to the identification of hazardous wastes that may be generated, treated, stored, or disposed during remedial activities.
New York State Regulations for Identification and Listing of Hazardous Waste	New York State Environmental Conservation Law (ECL) Article 27, Title 9; 6 NYCRR Part 371	Establishes procedures for identifying solid wastes which are subject to regulation as hazardous wastes.

Table 10b: Location-Specific ARARs, TBCs, and Other Guidelines

Statute/Regulation/Guideline	Citation	Requirement Synopsis
National Historic Preservation Act	16 U.S.C. §§ 470-470x-6; 36 C.F.R. Part 800	CERCLA remedial actions are required to take into account the effects of remedial activities on any historic properties (including objects) included on or eligible for inclusion on the National Register of Historic Places. Substantive requirements of the National Historic Preservation Act will be met for any cultural resources that may be impacted by the drilling of monitoring wells at the Site.

Table 10c: Action-Specific ARARs, TBCs, and Other Guidelines

Statute/Regulation/Guideline	Citation	Requirement Synopsis
RCRA Standards Applicable to Generators of Hazardous Waste	42 U.S.C. §§ 6901-6992k; 40 C.F.R. Part 262	Includes manifest, record keeping and other requirement applicable to generators of hazardous wastes.
RCRA Preparedness and Prevention	42 U.S.C. §§ 6905, 6912(a), 6924, and 6925; 40 CFR §§ 264.30 - 264.31	Contains requirements for safety equipment and spill control when treating, handling and/or storing hazardous wastes.
RCRA Contingency Plan and Emergency Procedures	42 U.S.C. §§ 6905, 6912(a), 6924, and 6925; 40 CFR §§ 264.50 - 264.56	Provides emergency procedures to be used following explosions, fires, etc. when storing hazardous wastes.
RCRA Land Disposal Restrictions	42 U.S.C. §§ 6921 and 6924; 40 CFR Part 376	Identifies hazardous wastes for which land disposal is restricted and provides a set of numerical constituent concentration criteria at which hazardous waste is restricted from land disposal (without treatment).
New York Hazardous Waste Management System – General	New York State ECL Article 27, Title 9 6 NYCRR Part 370	Provides definitions of terms and general instructions for the Part 370 series of hazardous waste management.
U.S. Department of Transportation Rules for Transportation of Hazardous Materials	49 CFR Parts 107, 171, 172, 177 to 179	Outlines procedures for the packaging, labeling, manifesting, and transporting hazardous materials. Any company contracted to transport hazardous material from the site will be required to comply with these regulations.
RCRA Standards Applicable to Transporters of Hazardous Waste	40 CFR Part 263	Establishes standards for hazardous waste transporters. Any company contracted to transport hazardous material from the site will be required to comply with these regulations.
New York Hazardous Waste Manifest System and Related Standards for Generators, Transporters and Facilities	6 NYCRR Part 372	Establishes record keeping requirements and standards related to the manifest system for hazardous wastes. Any company contracted to transport hazardous material from the site will be required to comply with these regulations.

Table 10c: Action-Specific ARARs, TBCs, and Other Guidelines (Cont'd)

Statute/Regulation/Guideline	Citation	Requirement Synopsis
New York Waste Transporter Permit Program	6 NYCRR Part 364	Establishes permit requirements for transportations of regulated waste. In accordance with CERCLA Section 121(e), a permit is not required for on-site CERCLA response actions, although the on-site transportation of regulated waste will comply with substantive requirements of these regulations.
Federal Directive – Control of Air Emissions from Superfund Air Strippers	EPA OSWER Directive 9355.0-28	Guidance on the use of controls for Superfund site air strippers as well as other vapor extraction techniques in attainment and non-attainment areas for ozone.
New York State Prevention and Control of Air Contamination and Air Pollution, General Prohibitions	6 NYCRR Part 211	Prohibits emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.
New York Division of Air Resources DAR-1 (Air Guide-1) AGC/SGC Tables		Guideline concentrations for toxic ambient air contaminants. Emissions from air strippers will comply with Air Guide-1.

APPENDIX III

ADMINISTRATIVE RECORD INDEX

COMPREHENSIVE ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

FINAL

09/23/2015

REGION ID: 02

Site Name: FULTON AVENUE
CERCLIS ID: NY0000110247
OUID: 01
SSID: 02JN
Action: ROD AMENDMENT

DocID:	Doc Date:	Title:	Image Count:	Doc Type:	Addressee Name:	Addressee Organization:	Author Name:	Author Organization:
718095	09/23/2015	COMPREHENSIVE ADMINISTRATIVE RECORD INDEX FOR OU1 FOR THE FULTON AVENUE SITE	44	[AR INDEX]	[]	[]	[,]	[US ENVIRONMENTAL PROTECTION AGENCY]
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100910	01/01/1111	FULTON AVENUE SITE, OPERABLE UNIT ONE, ADMINISTRATIVE RECORD FILE UPDATE, INDEX OF DOCUMENTS.	1	[INDEX]	[]	[]	[,]	[US ENVIRONMENTAL PROTECTION AGENCY]
108460	06/01/1998	Report: Remedial Investigation/Feasibility Study Work Plan, 150 Fulton Avenue, Garden City Park, NY, (Garden City Park Industrial Area Site Code #130073), prepared by Environmental Resources Management, prepared for Genesco Inc., June 1998.	268	[REPORT]	[,]	[GENESCO INCORPORATED]	[,]	[ENVIRONMENTAL RESOURCES MANAGEMENT INCORPORATED]
108461	11/01/1996	Report: Focused Remedial Investigation Report for the Fulton Avenue (Garden City Park Industrial Area) Site, Garden City Park, Nassau County, New York (Site Registry No. 1-30-073), prepared by Dvirka and Bartilucci Consulting Engineers, prepared for...	152	[REPORT]	[,]	[NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION]	[,]	[DVIRKA & BARTILUCCI ENGINEERS]
108462	11/01/1996	Report: Engineering Report, Interim Remedial Measure Soil Vapor Extraction and Air Sparging Systems, Fulton Avenue Site (Garden City Park Industrial Area), Town of North Hempstead, Nassau County (Site Registry No. 1-30-073), prepared by Dvirka and...	59	[REPORT]	[,]	[NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION]	[,]	[DVIRKA & BARTILUCCI ENGINEERS]

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108463	12/02/1998	Report: Final Engineering Report, Air Sparge/Soil Vapor Extraction System, 150 Fulton Avenue, (Garden City Park, NY, Garden City Park Industrial Area Site Code #130073), prepared by Environmental...	217	[REPORT]	[,]	[GENESCO INCORPORATED]	[,]	[ENVIRONMENTAL RESOURCES MANAGEMENT INCORPORATED]
108464	09/01/2002	Report: Draft Exposure Pathway Analysis Report, 150 Fulton Avenue, Garden City Park, NY (Garden City Park Industrial Area) NYSDEC Site Code #130073, prepared by Environmental Resources Management, prepared for Genesco Inc., September 2002.	78	[REPORT]	[,]	[GENESCO INCORPORATED]	[,]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108465	12/01/2004	Report: Draft Baseline Risk Assessment Report, 150 Fulton Avenue Site, Garden City Park, NY, prepared by Environmental Resources Management, prepared for Genesco Inc., December 2004.	120	[REPORT]	[,]	[GENESCO INCORPORATED]	[,]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108466	08/01/2005	Report: Remedial Investigation Report, 150 Fulton Avenue, Garden City Park, NY, prepared by Environmental Resources Management, prepared for Genesco Inc., August 2005.	337	[REPORT]	[,]	[GENESCO INCORPORATED]	[,]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108467	05/10/2002	Letter to Mr. John Swartwout, P.E., Division of Environmental Remediation, New York State Department of Environmental Conservation, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	2	[REPORT]	[SWARTWOUT, JOHN]	[NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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108468	08/12/2002	Letter to Mr. John Swartwout, P.E., Division of Environmental Remediation, New York State Department of Environmental Conservation, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	2	[REPORT]	[SWARTWOUT, JOHN]	[NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108469	09/10/2002	Letter to Mr. John Swartwout, P.E., Division of Environmental Remediation, New York State Department of Environmental Conservation, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	2	[REPORT]	[SWARTWOUT, JOHN]	[NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108470	07/10/2003	Letter to Mr. John Swartwout, P.E., Division of Environmental Remediation, New York State Department of Environmental Conservation, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	14	[REPORT]	[SWARTWOUT, JOHN]	[NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108471	08/11/2003	Letter to Mr. John Swartwout, P.E., Division of Environmental Remediation, New York State Department of Environmental Conservation, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	4	[REPORT]	[SWARTWOUT, JOHN]	[NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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108472	09/16/2003	Letter to Mr. John Swartwout, P.E., Division of Environmental Remediation, New York State Department of Environmental Conservation, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	4	[REPORT]	[SWARTWOUT, JOHN]	[NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108473	09/19/2003	Letter to Mr. Steven Scharf, P.E., Senior Project Engineer, Remedial Action Bureau A, Division of Environmental Remediation, New York State Department of Environmental Conservation, from Mr. Russell Sirabian, P.E., Principal...	2	[LETTER]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[SIRABIAN, RUSSELL]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108474	09/19/2003	Letter to Mr. Kevin Willis, Project Manager, Eastern NY Remediation Section, USEPA, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management, re: Remedial Investigation/Feasibility Study (RI/FS)...	1	[LETTER]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108475	10/08/2003	Letter to Mr. John Swartwout, P.E., Division of Environmental Remediation, New York State Department of Environmental Conservation, from Mr. John Mohlin, P.E., Project Manager - IRM, and Mr. Russell Sirabian, P.E., Senior Project Manager...	13	[REPORT]	[SWARTWOUT, JOHN]	[NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION]	[MOHLIN, JOHN , SIRABIAN, RUSSELL]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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108476	10/10/2003	Letter to Mr. John Swartwout, P.E., Division of Environmental Remediation, New York State Department of Environmental Conservation, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	11	[REPORT]	[SWARTWOUT, JOHN]	[NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108477	11/10/2003	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, .Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Group Manager/Senior Hydrogeologist, Environmental Resources...	6	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108478	12/09/2003	Letter to Mr. Michael Alarcon, Nassau County Department of Health Services, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management, re: 150 Fulton Avenue Site Quarterly Ground Water Sampling...	3	[LETTER]	[ALARCON, MICHAEL]	[NASSAU COUNTY HEALTH DEPT]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108479	12/10/2003	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Group Manager/Senior Hydrogeologist, Environmental Resources...	3	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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108480	03/10/2004	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Group Manager/Senior Hydrogeologist, Environmental Resources...	45	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108481	04/12/2004	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Group Manager/Senior Hydrogeologist, Environmental Resources...	8	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108482	04/23/2004	Letter to Mr. Steven M. Scharf, P.E., Division of Environmental Remediation, Remedial Action, Bureau A, New York State Department of Environmental Conservation, from Mr. Chris W. Wenczel, Senior Project Manager, and Mr. James A. Perazzo...	11	[LETTER]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[PERAZZO, JAMES A, WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108483	04/27/2004	Letter to Mr. Steven M. Scharf, P.E., Division of Environmental Remediation, Remedial Action, Bureau A, New York State Department of Environmental Conservation, from Mr. John Mohlin, P.E., Project Manager - IRM, and Mr. James Perazzo...	12	[LETTER]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[MOHLIN, JOHN , PERAZZO, JAMES A]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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108484	05/10/2004	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental...	4	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108485	05/26/2004	Letter to Residents from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management, re: Remedial Investigation/Feasibility Study, Garden City, New York, May 26, 2004.	2	[LETTER]	[,]	[NONE]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108486	06/10/2004	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources, Management...	28	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108487	06/18/2004	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, and Mr. Kevin Willis, Eastern NY Remediation Section, USEPA, from Mr. Chris W. Wenczel...	4	[LETTER]	[SCHARF, STEVEN , WILLIS, KEVIN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC), US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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108488	07/12/2004	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	7	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108489	08/23/2004	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. John Mohlin, P.E., Project Manager - IRM, and Mr. James Perazzo, Partner In Charge...	3	[LETTER]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[MOHLIN, JOHN , PERAZZO, JAMES A]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108490	09/10/2004	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	4	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108491	10/12/2004	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	3	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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108492	03/15/2005	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	3	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108493	03/15/2005	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	49	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108494	03/23/2005	Letter to Mr. Kevin Willis, U.S. EPA, Region 2, Emergency and Remedial Response Division, Eastern NY Remediation Section, and Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental...	10	[LETTER]	[SCHARF, STEVEN , WILLIS, KEVIN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC), US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108495	04/13/2005	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	3	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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108496	07/13/2006	Report: Feasibility Study Report, 150 Fulton Avenue Garden City Park, Nassau County, New York, prepared by ERM, July 13, 2006.	267	[REPORT]	[]	[]	[,]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108497	01/01/1111	Costing of Limited ICSO portion of Alternative 4.	1	[REPORT]	[]	[]	[]	[]
108498	12/19/2003	Letter to Mr. Steven M. Scharf, P.E. New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Group Manager/Senior Hydrogeologist, Environmental Resources...	5	[LETTER]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108499	02/14/2006	Letter to Mr. Chris Wenczel, ERM Inc., from Mr. Steven M. Scharf, P.E., Project Engineer, New York State Department of Environmental Conservation, Division of Environmental Remediation, Bureau of Remedial Action A, Section C...	11	[LETTER]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]
108500	03/20/2006	Letter to Mr. Steven M. Scharf, P.E., Remedial Bureau A, Division of Environmental Remediation, New York .State Department of Environmental Conservation, from Mr. James Perazzo, Principal; Mr. Chris W. Wenczel, Senior Project Manager...	10	[LETTER]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[PERAZZO, JAMES A, WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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108501	06/10/2006	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	3	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108502	07/10/2006	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	3	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108503	08/10/2006	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	72	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
108504	09/12/2006	Letter to Mr. Steven M. Scharf, P.E., New York State Department of Environmental Conservation, Division of Environmental Remediation, Remedial Action, Bureau A, from Mr. Chris W. Wenczel, Senior Project Manager, Environmental Resources Management...	2	[REPORT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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108505	02/08/2007	Letter to Mr. Christopher Wenczel, ERM Inc., from Mr. Steven M. Scharf, P.E., Senior Project Engineer, Remedial Action Bureau A, Division of Environmental Remediation, New York State Department of Environmental Conservation...	11	[LETTER]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]	[SCHARF, STEVEN]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]
108506	02/15/2007	Letter to Mr. Christopher Wenczel, ERM, from Mr. Kevin Willis, Remedial Project Manager, U.S. EPA, Region 2, re: Fulton Avenue Superfund Site, North Hempstead, New York, February 15, 2007.	7	[LETTER]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]
108507	06/17/1999	Record of Decision, National Heatset Printing Site, Town of Babylon, Suffolk County, Site Number 1-52-140, prepared by New York State Department of Environmental Conservation, June 17, 1999.	73	[REPORT]	[]	[]	[,]	[NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION]
108508	01/17/2006	Record of Decision, 100 Oser Avenue Site, Operable Unit 2, Smithtown, Suffolk County, New York, Site Number 1-52-162, prepared by New York State Department of Environmental Conservation, January 17, 2006.	49	[REPORT]	[]	[]	[,]	[NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION]
108509	09/29/2006	Record of Decision, Lawrence Aviation Industries, Inc. Superfund Site, Suffolk County, New York, prepared by U.S. EPA, Region 2, September 29, 2006.	67	[REPORT]	[]	[]	[,]	[US ENVIRONMENTAL PROTECTION AGENCY]

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108510	09/18/1997	Order on Consent, Index # W1-0707-94-08, Site Code # 130073, State of New York: Department of Environmental Conservation, In the Matter of the Development and Implementation of a Remedial Investigation/Feasibility Study and Interim...	21	[ORDER]	[]	[]	[,]	[NY STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION]
108511	04/25/2002	Letter to Mr. Hal N. Pennington, President,Genesco Inc., from Mr. Richard Caspe, Director, Emergency and Remedial Response Division, U.S. EPA, Region 2, re: Fulton Avenue Superfund Site, North Hempstead, Nassau County, NY, Request for Information...	17	[LETTER]	[PENNINGTON, HAL N]	[GENESCO INCORPORATED]	[CASPE, RICHARD L]	[US ENVIRONMENTAL PROTECTION AGENCY]
108512	06/07/2002	Letter to Ms. Liliana Villatora, Asst. Regional Counsel, New York/Caribbean Superfund Branch, U.S. EPA, Region II, from Ms. April A. Ingram, Boult, Cummings, Conners & Berry, PLC, re: Fulton Ave. Superfund Site, Request for Information Pursuant...	110	[LETTER]	[VILLATORA, LILIANA]	[US ENVIRONMENTAL PROTECTION AGENCY]	[INGRAM, APRIL A]	[BOULT, CUMMINGS, CONNERS & PERRY]
108513	06/17/1975	Memorandum to Files from Ms. Sue Mackay and Mr. Michael Giovaniello, Nassau County Department of Health, re: Industrial Solid Waste Survey Halnit Finishers, 150 Fulton Ave., Garden City Park, June 17, 1975.	3	[MEMORANDUM]	[FILES,]	[NASSAU COUNTY HEALTH DEPT]	[GIOVANIELLO, MICHAEL , MACKAY, SUE]	[NASSAU COUNTY HEALTH DEPT]

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108514	06/17/1975	Memorandum to Files from Ms. Sue Mackay and Mr. Michael Giovaniello, Nassau County Department of Health, re: Industrial Solid Waste Survey - Halnit Finishers, 150 Fulton Ave., Garden City Park, June 17, 1975.	2	[MEMORANDUM]	[FILES,]	[NASSAU COUNTY HEALTH DEPT]	[GIOVANIELLO, MICHAEL , MACKAY, SUE]	[NASSAU COUNTY HEALTH DEPT]
108515	04/28/1993	Report: NCDH/NCDPW Cooperative Agreement Project, Garden City Park Groundwater Quality Study, Preliminary Report, prepared by Mr. James Rhodes, Project Manager, Bureau of Water Supply Protection, Nassau County Department of Health...	30	[REPORT]	[]	[]	[RHODES, JAMES , SCHNEIDER, BRIAN]	[NASSAU COUNTY DEPARTMENT OF PUBLIC WORKS, NASSAU COUNTY HEALTH DEPT]
108516	09/30/1994	Letter to Louis P. Oliva, Esq., New York State Department of Environmental Conservation, Division of Environmental Enforcement, from Mr. Stephen L. Gordon, Beveridge & Diamond, P.C...	5	[LETTER]	[OLIVA, LOUIS P]	[NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION]	[GORDON, STEPHEN L]	[BEVERIDGE & DIAMOND]
108517	10/11/1994	Letter to Louis P. Oliva, Esq., New York State Department of Environmental Conservation, Division of Environmental Enforcement, from Mr. Stephen L. Gordon, Beveridge & Diamond, P.C., re: Garden City Park Industrial Area...	8	[LETTER]	[OLIVA, LOUIS P]	[NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION]	[GORDON, STEPHEN L]	[BEVERIDGE & DIAMOND]
108518	12/22/1995	Report: Summary of PID Results, Gordon Atlantic Corporation, 150 Fulton Avenue, Garden City Park, New York, prepared by Groundwater Technology, December 22, 1995.	8	[REPORT]	[]	[]	[,]	[GROUNDWATER TECHNOLOGY INCORPORATED]

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108519	05/31/1996	Letter to Mr. Laurence Gordon, Gordon Atlantic Corporation, from Mr. Carl Leighton, Legal Intern, and Ms. Samara Swanston, Field Unit Leader, New York State Department of Environmental Conservation, Division of Environmental Enforcement...	9	[LETTER]	[GORDON, LAURENCE]	[GORDON ATLANTIC CORPORATION]	[LEIGHTON, CARL , SWANSTON, SAMARA]	[NYS DEPARTMENT OF ENVIRONMENTAL CONSERVATION, US ENVIRONMENTAL PROTECTION AGENCY]
109330	10/08/1999	Letter to Mr. Laurence Gordon, Gordon Broadway Corporation, from Mr. John B. Swartwout, P.E., Chief, Eastern Investigation Section, Bureau of Hazardous Site Control, Division of Environmental Remediation, New York State Department of Environmental...	1	[LETTER]	[GORDON, LAURENCE]	[GORDON BROADWAY CORPORATION]	[SWARTWOUT, JOHN]	[NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION]
109331	12/18/2002	Letter to Mr. Laurence Gordon, Gordon Atlantic Corporation, from Mr. George Pavlou, Director, Emergency and Remedial Response Division, U.S. EPA, Region 2, re: Fulton Avenue Superfund Site, North Hempstead, Nassau County, NY...	18	[LETTER]	[GORDON, LAURENCE]	[GORDON ATLANTIC CORPORATION]	[PAVLOU, GEORGE]	[US ENVIRONMENTAL PROTECTION AGENCY]
109332	02/04/2003	Letter to Ms. Cynthia Psoras, U.S. EPA, Region 2, from Mr. Christopher J. McKenzie, Beveridge & Diamond, P.C., re: Gordon Atlantic Corporation, Fulton Avenue Site, February 4, 2003.	3	[LETTER]	[PSORAS, CYNTHIA]	[US ENVIRONMENTAL PROTECTION AGENCY]	[MCKENZIE, CHRISTOPHER J]	[BEVERIDGE & DIAMOND]
109333	03/27/2003	Letter to Ms. Cynthia Psoras, U.S. EPA, Region 2, from Mr. Christopher J. McKenzie, Beveridge & Diamond, P.C., re: Response to CERCLA Section 104 Information Request, Fulton Avenue Site, March 27, 2003.	13	[REPORT]	[PSORAS, CYNTHIA]	[US ENVIRONMENTAL PROTECTION AGENCY]	[MCKENZIE, CHRISTOPHER J]	[BEVERIDGE & DIAMOND]

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109334	07/08/2002	Report: Public Health Assessment, 150 Fulton Avenue/Garden City Park Industrial Area, Garden City Park, Nassau County, New York, prepared by New York State Department of Health Center for Environmental Health, prepared under a Cooperative...	110	[REPORT]	[]	[]	[,]	[NEW YORK STATE DEPARTMENT OF HEALTH CENTER FOR ENVIRONMENTAL HEALTH]
109335	01/01/1999	Fact Sheet, Environmental Investigations in Garden City Park Industrial Area (GCPIA), prepared by New York State Department of Environmental Conservation, January 1999	7	[REPORT]	[]	[]	[,]	[NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION]
109336	02/01/2007	Fulton Avenue Superfund Site (OU1), Garden City Park, Nassau County, New York, prepared by U.S. EPA, Region 2, February 2007.	9	[REPORT]	[]	[]	[,]	[US ENVIRONMENTAL PROTECTION AGENCY]
109337	02/12/2007	Letter to Mr. George Pavlou, P.E., Director, Emergency Remedial Response Division, U.S. EPA, Region 2, from Mr. Dale A. Desnoyers, Director, Division of Environmental Remediation, New York State Department of Environmental Conservation...	1	[LETTER]	[PAVLOU, GEORGE]	[US ENVIRONMENTAL PROTECTION AGENCY]	[DESNOYERS, DALE]	[NY STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION]
109338	01/01/1111	Report: Safeguarding a Sustainable Water Supply, prepared by Residents for a More Beautiful Port Washington as a reflection of the community water symposium of December 7, 2002, which was hosted by The Port Washington Public Library.	19	[REPORT]	[]	[]	[,]	[RESIDENTS FOR A MORE BEAUTIFUL PORT WASHINGTON]

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109339	09/28/2007	Record of Decision, Fulton Avenue Superfund Site, Nassau County, New York, prepared by U.S. EPA, Region 2, September 28, 2007.	234	[REPORT]	[]	[]	[,]	[US ENVIRONMENTAL PROTECTION AGENCY]
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306796	10/17/2009	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 10/2009 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	611	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
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319028	12/10/2009	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 11/2009 - ADMINISTRATIVE ORDER NO. CERCLA-02-2009-2028 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
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318978	01/07/2010	SAMPLING DATA JOB NO. JA37168 FOR PERIOD 01/05/2010 - 01/07/2010 FOR THE FULTON AVENUE SITE	431	[REPORT]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]	[,]	[ACCUTEST LABORATORIES]
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306804	07/21/2010	GROUNDWATER SAMPLING RESULTS FOR OU1 FOR 05/2010 - ADMINISTRATIVE ORDER NO. CERCLA-02-2009-2028 FOR THE FULTON AVENUE SITE	765	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318971	08/01/2010	DATA ANALYSIS LAB RESULTS AUGUST 2010 FOR THE FULTON AVENUE SITE	1	[REPORT]	[]	[]	[]	[]
306805	08/10/2010	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 07/2010 - ADMINISTRATIVE ORDER NO. CERCLA-02-2009-2028 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
306806	08/10/2010	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 07/2010 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	4	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318961	08/16/2010	QUALITY ASSURANCE PROJECT PLAN FOR THE FULTON AVENUE SITE	83	[REPORT]	[,]	[US ENVIRONMENTAL PROTECTION AGENCY]	[,]	[LOCKHEED MARTIN / SERAS]
306807	09/14/2010	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 08/2010 - ADMINISTRATIVE ORDER NO. CERCLA-02-2009-2028 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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306808	09/14/2010	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 08/2010 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	4	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318953	09/14/2010	TRANSMITTAL OF THE AUGUST 2010 MONTHLY PROGRESS REPORT FOR OU 1 FOR THE FULTON AVENUE SITE	4	[LETTER]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318958	09/14/2010	PRELIMINARY RESULTS FOR WA# 0098 WITH CHAIN OF CUSTODY NO. 2-082710-083859-0004 FOR THE FULTON AVENUE SITE	8	[REPORT]	[SINGHVI , RAJESHMAL]	[US ENVIRONMENTAL PROTECTION AGENCY]	[KANSAL, VINOD]	[LOCKHEED MARTIN TECHNOLOGY SERVICES]
319033	10/14/2010	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 09/2010 - ADMINISTRATIVE ORDER NO. CERCLA-02-2009-2028 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319043	10/14/2010	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 09/2010 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	4	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318965	10/26/2010	DEPOSITION OF RICHARD HUMANN CASE NO. 2:07-CV-05244 FOR THE FULTON AVENUE SITE	60	[ORDER]	[]	[]	[HUMANN , RICH]	[H2M CONSULTING ENGINEERS]
306809	11/18/2010	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 10/2010 - ADMINISTRATIVE ORDER NO. CERCLA-02-2009-2028 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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306810	11/18/2010	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 10/2010 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	8	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318968	12/08/2010	TRIP REPORT FOR SOIL AND GROUNDWATER SAMPLING FOR THE FULTON AVENUE SITE	79	[REPORT]	[CATANZARITA, JEFF , LEUSER, RICK]	[LOCKHEED MARTIN INC, US ENVIRONMENTAL PROTECTION AGENCY]	[BOLDUC, JEAN]	[LOCKHEED MARTIN TECHNOLOGY SERVICES]
319034	12/15/2010	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 11/2010 - ADMINISTRATIVE ORDER NO. CERCLA-02-2009-2028 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319044	12/15/2010	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 11/2010 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	4	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
306811	01/17/2011	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 12/2010 - ADMINISTRATIVE ORDER NO. CERCLA-02-2009-2028 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
306812	01/17/2011	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 12/2010 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	4	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318960	01/22/2011	ANALYTICAL REPORT FOR THE FULTON AVENUE SITE	13	[REPORT]	[CATANZARITA, JEFF]	[US ENVIRONMENTAL PROTECTION AGENCY]	[,]	[LOCKHEED MARTIN / SERAS]

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319036	02/24/2011	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 01/2011 - ADMINISTRATIVE ORDER NO. CERCLA-02-2009-2028 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319047	02/24/2011	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 01/2011 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	4	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319035	03/16/2011	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 02/2011 - ADMINISTRATIVE ORDER NO. CERCLA-02-2009-2028 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319046	03/16/2011	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 02/2011 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	4	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318954	05/25/2011	TRANSMITTAL OF THE APRIL 2011 MONTHLY PROGRESS REPORT FOR OU 1 FOR THE FULTON AVENUE SITE	2	[LETTER]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319042	06/14/2011	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 05/2011 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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306813	09/27/2011	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 06/2011 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
306814	09/27/2011	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 07/2011 AND 08/2011 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	6	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318944	10/01/2011	REMEDIAL DESIGN WORK PLAN FOR OU1 FOR THE FULTON AVENUE SITE	635	[PLAN]	[]	[]	[,]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
306815	11/28/2011	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 10/2011 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319048	01/24/2012	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 12/2011 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	3	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318959	01/27/2012	ANALYTICAL REPORT FOR THE FULTON AVENUE SITE	20	[REPORT]	[CATANZARITA, JEFF]	[US ENVIRONMENTAL PROTECTION AGENCY]	[,]	[LOCKHEED MARTIN / SERAS]
318987	01/30/2012	PUMPAGE WELL DATA WELL NO. 9 N-03881, WELL NO. 13 N-07058, WELL NO. 14 N-08339 FOR PERIOD 1968- 2012 FOR THE FULTON AVENUE SITE	9	[CHART / TABLE]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[]	[]

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318941	02/01/2012	PRELIMINARY 30% REMEDIAL DESIGN REPORT FOR OU1 FOR THE FULTON AVENUE SITEFOR THE FULTON AVENUE SITE	235	[REPORT]	[,]	[GENESCO INCORPORATED]	[,]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292460	02/18/2012	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 01/2012 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	16	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318940	02/22/2012	TRANSMITTAL OF THE PRELIMINARY 30% REMEDIAL DESIGN FOR OU1 FOR THE FULTON AVENUE SITE	4	[LETTER]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318962	02/22/2012	TRIP REPORT FOR NOVEMBER 2011 SUB-SLAB SOIL GAS SAMPLING AND DECEMBER 2011 TAGA INDOOR AIR MONITORING AND SUB-SLAB SOIL GAS INDOOR AIR SAMPLING WORK ASSIGNMENT #SER00098 FOR THE FULTON AVENUE SITE	113	[REPORT]	[CATANZARITA, JEFF]	[US ENVIRONMENTAL PROTECTION AGENCY]	[CARTWRIGHT, MICHAEL]	[LOCKHEED MARTIN TECHNOLOGY SERVICES]
318991	03/11/2012	GENESCO HYDRAULIC EVALUATION PUMP TEST WATER LEVEL SUMMARY FOR 2/28/2012 - 3/11/2012 FOR THE FULTON AVENUE SITE	1	[CHART / TABLE]	[]	[]	[]	[]
318992	03/11/2012	GENESCO PUMP TEST ELEVATION DATA ANALYSIS TOOL FOR THE FULTON AVENUE SITE	458	[CHART / TABLE]	[]	[]	[]	[]
318993	03/13/2012	GENESCO PUMP TEST RAW DATA EVALUATION FOR THE FULTON AVENUE SITE	273	[CHART / TABLE]	[]	[]	[]	[]
319045	03/15/2012	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 02/2012 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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318952	03/29/2012	PRESENTATION: REMEDIAL DESIGN OU 1 FOR THE FULTON AVENUE SITE	35	[CHART / TABLE]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[HUMANN , RICH , Koch, Frank , PERAZZO, JAMES A, WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT, H2M CONSULTING ENGINEERS, Village of Garden City]
319087	04/05/2012	REQUEST FOR GENESCO AND THE VILLAGE OF GARDEN CITY TO SUBMIT AN ANALYSIS WHICH COMPARES THE REMEDIAL ACTION OF US EPA'S OU1 RECORD OF DECISON AGAINST A MODIFIED VERSION OF THE REMEDIAL ACTION - GARDEN CITY WELLS 9, 13 AND 14 FOR THE FULTON AVENUE SITE	2	[REPORT]	[ALEXIS, PAUL , PERICONI, JAMES J, YUDELSON, DAVID S]	[BRADLEY ARANT BOULT CUMMINGS LLP, PERICONI LLC, SIVE, PAGET & RIESEL, P.C.]	[KAMBIC, ROBERT B]	[US DEPARTMENT OF JUSTICE]
319085	05/03/2012	PROPOSED REMEDIAL DESIGN MODIFICATION ANALYSIS FOR OU1 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	13	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318945	05/03/2012	TRANSMITTAL OF THEPROPOSED REMEDIAL DESIGN MODIFICATION ANALYSIS FOR OU1 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[LETTER]	[KAMBIC, ROBERT B]	[US ATTORNEY'S OFFICE, EDNY]	[PERICONI, JAMES J]	[PERICONI LLC]
292461	05/20/2012	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 04/2012 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	3	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292466	05/20/2012	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 03/2012 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	3	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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318995	06/21/2012	VILLAGE OF GARDEN CITY - EXCERPT FROM THE BOARD OF TRUSTEES MEETING ON 06/21/2012 REGARDING THE RESOLUTION NO. 86-2012 - RECORD OF DECISION AMENDMENT FOR THE FULTON AVENUE SITE	3	[OTHER]	[]	[]	[]	[]
318966	07/24/2012	SUMMARY OF ADDITIONAL EVALUATIONS REGARDING THE PROPOSED REMEDIAL DESIGN MODIFICATION ANALYSIS, GROUNDWATER FLOW MODELING AND FORECASTING FOR THE FULTON AVENUE SITE	22	[LETTER]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292465	07/30/2012	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 06/2012 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	3	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292467	07/30/2012	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 05/2012 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	16	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318957	02/12/2013	GENESCO INCORPORATED'S RESPONSE TO US EPA LETTER ON 11/06/2012 REGARDING THE IN-SITU CHEMCIAL OXIDATION COMPONENT FOR THE FULTON AVENUE SITE	10	[]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[PERAZZO, JAMES A, WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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292462	02/27/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 08/2012 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	3	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292463	02/27/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 12/2012 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292464	02/27/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 07/2012 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	3	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292468	02/27/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 11/2012 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292469	02/27/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 10/2012 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292470	02/27/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 09/2012 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	3	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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319071	03/22/2013	US EPA COMMENTS REGARDING THE IN-SITU CHEMICAL OXIDATION COMPONENT OU1 REMEDIAL DESIGN FOR THE FULTON AVENUE SITE	2	[LETTER]	[PERAZZO, JAMES A]	[ENVIRONMENTAL RESOURCES MANAGEMENT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]
292473	04/08/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 02/2013 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292474	04/08/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 01/2013 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	248	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292477	04/09/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 03/2013 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292471	05/07/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 04/2013 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	7	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318974	05/14/2013	BOH MEETING 05/14/2013 MONTHLY REPORT FOR THE FULTON AVENUE SITE	1	[REPORT]	[]	[]	[]	[]
318947	05/29/2013	FIGURE 4 - GROUNDWATER FLOW MODEL OUTPUT VGC SUPPLY WELL NOS. 13 & 14 FOR THE FULTON AVENUE SITE	1	[FIGURE]	[,]	[GENESCO INCORPORATED]	[,]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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318973	05/29/2013	CORRESPONDENCE TO SUMMARIZE THE RESULTS OF GROUNDWATER FLOW MODELING AND EVALUATIONS TO FURTHER INFORM EPA'S DECISION ON WHETHER TO MODIFY THE SELECTED REMEDY FOR THE FULTON AVENUE SITE	9	[LETTER]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319051	06/07/2013	SAMPLING RESULTS FOR MW-21C - SDG NO. 1305061 FOR OU2 FOR THE FULTON AVENUE SITE	3	[CHART / TABLE]	[]	[]	[,]	[HDR INCORPORATED]
292481	06/10/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 05/2013 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	3	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292480	07/08/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 06/2013 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318956	07/12/2013	GENESCO INCORPORATED'S RESPONSE TO US EPA LETTER ON 03/22/2013 REGARDING THE IN-SITU CHEMICAL OXIDATION COMPONENT FOR THE FULTON AVENUE SITE	2	[LETTER]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[PERAZZO, JAMES A, WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292475	08/12/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 07/2013 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	3	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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319070	09/05/2013	US EPA RESPONSE TO ENVIRONMENTAL RESOURCE MANAGEMENT'S CORRESPONDENCE DATED 07/12/2013 REGARDING THE INTALLATION OF DEEP BORINGS FOR THE FULTON AVENUE SITE	2	[LETTER]	[ALEXIS, PAUL]	[BRADLEY ARANT BOULT CUMMINGS LLP]	[FISCHER, DOUGLAS]	[US ENVIRONMENTAL PROTECTION AGENCY]
292472	09/10/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 08/2013 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	3	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319069	09/28/2013	REMEDIAL DESIGN WORK PLAN ADDENDUM FOR OU1 FOR CONTINUED GROUNDWATER INVESTIGATION FOR THE FULTON AVENUE SITE	15	[PLAN]	[]	[]	[,]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292479	10/09/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 09/2013 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318988	10/23/2013	GC SUPPLY WELL NO. 9 PUMPAGE DATA AND RAW WATER SAMPLE RESULTS THROUGH 10/2013 FOR THE FULTON AVENUE SITE	8	[CHART / TABLE]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[]	[]
318955	10/30/2013	CORRESPONDENCE REGARDING THE RESOLUTION ADOPTED AT THE BOARD OF TRUSTEE MEETING ON 06/21/2012 FOR THE FULTON AVENUE SITE	1	[LETTER]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[BROWN , CYNTHIA]	[NONE]

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319058	11/07/2013	MEETING MINUTES OF THE BOARD OF TRUSTEES OF THE VILLAGE OF GARDEN CITY MEETING HELD ON 11/07/2013 FOR THE FULTON AVENUE SITE	12	[MEETING MINUTES]	[]	[]	[]	[]
319068	11/07/2013	US EPA COMMENTS AND APPROVAL OF THE 09/2013 OU1 REMEDIAL DESIGN WORK PLAN ADDENDUM RECEIVED FROM ENVIRONMENTAL RESOURCES MANAGEMENT ON BEHALF OF GENESCO INCORPORATED FOR THE FULTON AVENUE SITE	3	[LETTER]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]
319012	11/12/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 10/2013 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319072	11/15/2013	REVISED FINAL REMEDIAL DESIGN WORK PLAN ADDENDUM FOR OU1 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	16	[PLAN]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292482	12/10/2013	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 11/2013 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	3	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319060	12/17/2013	H2M CORRESPONDENCE REGARDING VILLAGE OF GARDEN CITY AND THE OVERALL STRATEGY FOR DEALING WITH THE FULTON AVENUE SITE	3	[LETTER]	[,]	[INCORPORATED VILLAGE OF GARDEN CITY]	[HUMANN, RICHARD W]	[H2M ARCHITECTS + ENGINEERS]

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319061	12/20/2013	TRANSMITTAL OF H2M CORRESPONDENCE REGARDING VILLAGE OF GARDEN CITY AND THE OVERALL STRATEGY FOR DEALING WITH THE FULTON AVENUE SITE	1	[LETTER]	[BROWN , CYNTHIA]	[NONE]	[SCHOELLE, ROBERT L]	[INCORPORATED VILLAGE OF GARDEN CITY]
319062	12/27/2013	REDACTED CORRESPONDENCE FROM CYNTHIA BROWN REGARDING H2M'S RESPONSE TO HER PREVIOUS LETTER REGARDING THE VILLAGE OF GARDEN CITY AND THE OVERALL STRATEGY FOR THE FULTON AVENUE SITE	1	[LETTER]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[BROWN , CYNTHIA]	[NONE]
318979	01/07/2014	LABORATORY RESULTS AIR STRIPPERS FOR WELL 1 AND 2 FOR LAB NO. 1401216-001 - 1401216-003 FOR THE FULTON AVENUE SITE	7	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]
319006	01/10/2014	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 12/2013 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	3	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318980	02/04/2014	LABORATORY RESULTS AIR STRIPPERS FOR WELL 1 AND 2 FOR LAB NO. 1402121-001 - 1402121-003 FOR THE FULTON AVENUE SITE	8	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]
319008	02/10/2014	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 01/2014 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	3	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318981	03/04/2014	LABORATORY RESULTS AIR STRIPPERS FOR WELL 1 AND 2 FOR LAB NO. 1403168-001 - 1403168-003 FOR THE FULTON AVENUE SITE	8	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]

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292486	03/11/2014	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 10/2014 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	7	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318302	03/18/2014	PRESENTATION ON BEHALF OF THE INCORPORATED VILLAGE OF GARDEN CITY AND GENESCO INCORPORATED FOR THE FULTON AVENUE SITE	21	[OTHER]	[]	[]	[,]	[H2M CONSULTING ENGINEERS]
318982	04/01/2014	LABORATORY RESULTS AIR STRIPPERS FOR WELL 1 AND 2 FOR LAB NO. 1404075-001 - 1404075-003 FOR THE FULTON AVENUE SITE	7	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]
319010	04/14/2014	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 03/2014 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318983	05/06/2014	LABORATORY RESULTS AIR STRIPPERS FOR WELL 1 AND 2 FOR LAB NO. 1405384-001 - 1405384-003 FOR THE FULTON AVENUE SITE	8	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]
319004	05/16/2014	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 04/2014 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318997	06/01/2014	NASSAU COUNTY PUBLIC HEALTH ORDINANCE DATED 06/2014	213	[OTHER]	[]	[]	[EISENSTEIN, LAWRENCE]	[NASSAU COUNTY]

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318984	06/03/2014	LABORATORY RESULTS AIR STRIPPERS FOR WELL 1 AND 2 FOR LAB NO. 1406212-001 -1406212-003 FOR THE FULTON AVENUE SITE	8	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]
292487	06/23/2014	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 05/2014 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	6	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318985	07/01/2014	LABORATORY RESULTS AIR STRIPPERS FOR WELL 1 AND 2 FOR LAB NO. 1407087-001 - 1407087-003 FOR THE FULTON AVENUE SITE	7	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]
318948	07/01/2014	REMEDIAL DESIGN SUPPLEMENTAL TECHNICAL MEMORANDUM FOR OU1 FOR THE FULTON AVENUE SITE	3321	[REPORT]	[]	[]	[,]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292484	07/30/2014	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 06/2014 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
318986	08/05/2014	LABORATORY RESULTS AIR STRIPPERS FOR WELL 1 AND 2 FOR LAB NO. 1408282-001 - 1408282-003 FOR THE FULTON AVENUE SITE	15	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]
292483	08/20/2014	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 07/2014 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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319078	09/02/2014	LABORATORY RESULTS AIR STRIPPERS FOR WELLS 1 AND 2 FOR LAB NO. 1409061-001 - 1409061-003 FOR THE FULTON AVENUE SITE	9	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]
319005	09/25/2014	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 08/2014 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319079	10/07/2014	LABORATORY RESULTS AIR STRIPPERS FOR WELLS 1 AND 2 FOR LAB NO. 1410513-001 - 1410513-003 FOR THE FULTON AVENUE SITE	8	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]
319013	10/31/2014	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 09/2014 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
292485	11/01/2014	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 10/2014 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319080	11/05/2014	LABORATORY RESULTS AIR STRIPPERS FOR WELLS 1 AND 2 FOR LAB NO. 1411275-001 - 1411275-003 FOR THE FULTON AVENUE SITE	8	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]

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319015	11/18/2014	ERM REVISED REMEDIAL ALTERNATIVE COST ESTIMATES - LIMITED ACTION AND GROUNDWATER EXTRACTION, TREATMENT AND SURFACE RECHARGE FOR OU1 FOR THE FULTON AVENUE SITE	4	[LETTER]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319081	12/02/2014	LABORATORY RESULTS AIR STRIPPERS FOR WELLS 1 AND 2 FOR LAB NO. 1412138-001 - 1412138-003 FOR THE FULTON AVENUE SITE	9	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]
319054	12/04/2014	CORRESPONDENCE REGARDING EVALUATION OF AIR STRIPPING TOWER EMISSIONS H2M PROJECT NO. GARV 14-01 FOR THE FULTON AVENUE SITE	12	[LETTER]	[ALARCON, MICHAEL]	[NASSAU COUNTY HEALTH DEPT]	[TODARO, JOSEPH]	[H2M ARCHITECTS + ENGINEERS]
319011	12/15/2014	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 11/2014 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319082	01/01/2015	NYDEC PUMPAGE REPORT FOR 2014 IN THOUSANDS OF GALLONS FOR WELL NOS. N3603, N3604, N3605, N7117, AND N8818 FOR THE FULTON AVENUE SITE	1	[CHART / TABLE]	[]	[]	[,]	[NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION]
319075	01/06/2015	LABORATORY RESULTS AIR STRIPPERS FOR WELLS 1 AND 2 FOR LAB NO. 1501196-001 - 1501196-003 FOR THE FULTON AVENUE SITE	8	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]
319014	01/14/2015	H2M COST ESTIMATES FOR OU1 FOR THE FULTON AVENUE SITE	4	[LETTER]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[HUMANN, RICHARD W]	[H2M ARCHITECTS + ENGINEERS]

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319059	01/30/2015	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 12/2014 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319076	02/03/2015	LABORATORY RESULTS AIR STRIPPERS FOR WELLS 1 AND 2 FOR LAB NO. 1502144-001 - 1502144-003 FOR THE FULTON AVENUE SITE	9	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]
319009	02/16/2015	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 01/2015 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	6	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319088	02/16/2015	SAMPLING DATA FOR WELLS 9, 13, AND 14 FOR THE TIME PERIOD OF 01/16/2009 - 02/16/2015 FOR THE FULTON AVENUE SITE	3562	[OTHER]	[]	[]	[]	[]
319077	03/03/2015	LABORATORY RESULTS AIR STRIPPERS FOR WELLS 1 AND 2 FOR LAB NO. 1503165-001 - 1502165-003 FOR THE FULTON AVENUE SITE	9	[CHART / TABLE]	[]	[]	[,]	[PACE ANALYTICAL]
319007	03/24/2015	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 02/2015 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319065	03/27/2015	CORRESPONDENCE AND CHARTS REGARDING THE PUMPAGE CHANGES IN WELL NOS. 9, 13, AND 14 FOR 2008 - 2014 FOR THE FULTON AVENUE SITE	6	[E MAIL MESSAGE]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

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319067	03/30/2015	UNVALIDATED DATA FOR 03/2015 GROUNDWATER SAMPLES COLLECTED FROM SELECT WELLS REQUESTED BY US EPA FOR THE FULTON AVENUE SITE	31	[E MAIL MESSAGE]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319053	03/31/2015	NEW YORK STATE CONCURRENCE WITH THE PROPOSED PLAN FOR THE ROD AMENDMENT FOR OU1 FOR THE FULTON AVENUE SITE	2	[LETTER]	[MUGDAN, WALTER E]	[US ENVIRONMENTAL PROTECTION AGENCY]	[SCHICK, ROBERT]	[NY STATE DEPT OF ENVIRONMENTAL CONSERVATION (NYSDEC)]
319074	04/13/2015	GROUNDWATER SAMPLING RESULTS FOR OU1 FOR 03/2015 - ADMINISTRATIVE ORDER NO. CERCLA-02-2009-2028 FOR THE FULTON AVENUE SITE	1207	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319086	04/14/2015	SAMPLING RESULTS FOR WELL 13 AND WELL 14 FOR THE FULTON AVENUE SITE	10	[REPORT]	[]	[]	[MURRELL, STU]	[PACE ANALYTICAL]
319064	04/22/2015	COST ESTIMATES FOR REMEDIAL ALTERNATIVES GW-1 AND GW-2 FOR THE PROPOSED PLAN FOR AMENDING 2007 FIRST OPERABLE UNIT RECORD OF DECISION FOR THE FULTON AVENUE SITE	3	[MEMORANDUM]	[]	[]	[BADALAMENTI, SALVATORE]	[US ENVIRONMENTAL PROTECTION AGENCY]
319073	04/22/2015	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 03/2015 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319084	04/23/2015	PROPOSED PLAN FOR OU1 RECORD OF DECISION AMENDMENT FOR THE FULTON AVENUE SITE	11	[PLAN]	[]	[]	[,]	[US ENVIRONMENTAL PROTECTION AGENCY]

COMPREHENSIVE ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

FINAL

09/23/2015

REGION ID: 02

Site Name: FULTON AVENUE
CERCLIS ID: NY0000110247
OUID: 01
SSID: 02JN
Action: ROD AMENDMENT

DocID:	Doc Date:	Title:	Image Count:	Doc Type:	Addressee Name:	Addressee Organization:	Author Name:	Author Organization:
319087	04/05/2012	REQUEST FOR GENESCO AND THE VILLAGE OF GARDEN CITY TO SUBMIT AN ANALYSIS WHICH COMPARES THE REMEDIAL ACTION OF US EPA'S OU1 RECORD OF DECISON AGAINST A MODIFIED VERSION OF THE REMEDIAL ACTION - GARDEN CITY WELLS 9, 13 AND 14 FOR THE FULTON AVENUE SITE	2	[REPORT]	[ALEXIS, PAUL , PERICONI, JAMES J, YUDELSON, DAVID S]	[BRADLEY ARANT BOULT CUMMINGS LLP, PERICONI LLC, SIVE, PAGET & RIESEL, P.C.]	[KAMBIC, ROBERT B]	[US DEPARTMENT OF JUSTICE]
350506	05/26/2015	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 04/2015 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319543	06/19/2015	ENVIRONMENTAL RESOURCES MANAGEMENT - 05/2015 GROUNDWATER SAMPLING RESULTS FOR FULTON AVENUE SITE	56	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
350507	06/23/2015	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 05/2015 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
350508	07/27/2015	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 06/2015 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	2	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]

COMPREHENSIVE ADMINISTRATIVE RECORD INDEX OF DOCUMENTS

FINAL

09/23/2015 **REGION ID: 02**

Site Name: FULTON AVENUE
CERCLIS ID: NY0000110247
OUID: 01
SSID: 02JN
Action: ROD AMENDMENT

DocID:	Doc Date:	Title:	Image Count:	Doc Type:	Addressee Name:	Addressee Organization:	Author Name:	Author Organization:
350509	08/25/2015	ENVIRONMENTAL RESOURCES MANAGEMENT - MONTHLY PROGRESS REPORT FOR OU1 FOR 07/2015 - CONSENT JUDGMENT NO. CV-09-3917 FOR THE FULTON AVENUE SITE	4	[REPORT]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[WENCZEL, CHRIS W]	[ENVIRONMENTAL RESOURCES MANAGEMENT]
319540	08/27/2015	SUPPLEMENTAL RISK EVALUATION FOR OU1 FOR THE FULTON AVENUE SITE	7	[MEMORANDUM]	[WILLIS, KEVIN]	[US ENVIRONMENTAL PROTECTION AGENCY]	[FILIPOWICZ, URSZULA]	[US ENVIRONMENTAL PROTECTION AGENCY]

APPENDIX IV

STATE CONCURRENCE LETTER

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Office of the Director
625 Broadway, 12th Floor, Albany, New York 12233-7011
P: (518) 402-9706 | F: (518) 402-9020
www.dec.ny.gov

Sent Via Email Only August 18, 2015

Walter Mudgan, Director
Emergency and Remedial Response Division
United States Environmental Protection Agency
Region II Office
290 Broadway
New York, NY 10007-1866

Re: Record of Decision Amendment
Site Name: Fulton Avenue (Garden City Park Indust.) NPL
Site Operable Unit 1 (OU1), Nassau (C)
DEC Site No. 130073

Dear Mr. Mudgan:

The New York State Department of Environmental Conservation (DEC) and the New York State Department of Health (DOH) have reviewed the above referenced 2015 OU1 final ROD Amendment for the Fulton Avenue National Priorities List (NPL) site.

Through this Record of Decision (ROD) amendment, the United States Environmental Protection Agency (EPA) is modifying the scope and role of the response action identified in the 2007 ROD, which included a groundwater extraction and treatment system that would restore the groundwater to its beneficial use. The ROD selected groundwater extraction system was expected to "more expeditiously meet chemical-specific applicable or relevant and appropriate requirements, or "ARARs" for the groundwater." The remedy provided for the groundwater extraction wells be operated at a pumping rate adequate to hydraulically contain the contaminated groundwater and prevent it from migrating into the area of influence of Garden City Water District wells 13 and 14.

Given the extensive dispersal of PCE within the OU1 plume, the EPA determined that the extraction system contemplated in the 2007 ROD would not be effective in pulling the PCE contamination back from wells 13 and 14. Moreover, data collected since 2007 show that PCE levels are declining in the OU1 portion of the groundwater plume, and the treatment systems currently installed on wells 13 and 14 are effectively removing PCE and other VOCs from groundwater entering the wells.

Therefore, the groundwater extraction system is no longer needed to protect the potable water supply obtained from Village wells 13 and 14 and thus, this amendment proposes to eliminate the OU1 extraction and treatment system.

The EPA will instead address restoration of the groundwater in conjunction with its evaluation of a final remedial approach for the Site that includes running the Village of Garden City wells at their current rate of extraction.

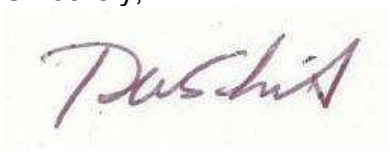
The 2007 ROD also called for the application of an in-situ chemical oxidation (ISCO) technology. Investigations performed during the OU1 remedial design did not identify PCE source material in the shallow aquifer amenable to ISCO treatment in the immediate vicinity of the Fulton Property. Therefore, ISCO will not be applied to the shallow aquifer at that location.

The EPA Fulton Avenue ROD Amendment also calls for a vapor intrusion evaluation of structures that are in the vicinity of the Fulton Property and that could potentially be affected by the OU1 portion of the groundwater contamination plume. An appropriate response action (such as sub-slab ventilation systems) may be implemented based on the results of the investigation. The operation and maintenance (O&M) of the existing sub-slab ventilation system at the Fulton Property will continue.

The EPA will also continue to investigate additional areas where possible source material may exist under Operable Unit 2 (OU2) that may need to be addressed. This investigation will include source(s) of elevated PCE observed in nearby monitoring well GCP-01, located southwest and downgradient of the Fulton Property.

Therefore, the State concurs with the changes to the selected remedy as stated in the 2015 OU1 ROD Amendment. If you have any questions, please contact Mr. Jim Harrington, of my staff, at (518) 402-9625.

Sincerely,



Robert W. Schick, P.E.
Director
Division of Environmental Remediation

ec: Sal Badalamenti, EPA
Angela Carpenter, EPA
Krista Anders, DOH
Charlotte Bethoney, DOH
Renata Ockerby, DOH
J. DeFranco, NCDH
Jim Harrington, DEC
John Swartwout, DEC
Steve Scharf, DEC
Walter Parish, DEC

APPENDIX V

RESPONSIVENESS SUMMARY

RESPONSIVENESS SUMMARY

FOR THE

RECORD OF DECISION AMENDMENT

FULTON AVENUE SUPERFUND SITE, FIRST OPERABLE UNIT

TOWNS OF NORTH HEMPSTEAD AND HEMPSTEAD,

NASSAU COUNTY, NEW YORK

INTRODUCTION

This Responsiveness Summary provides a summary of citizens' significant comments submitted during the public comment period for the U.S. Environmental Protection Agency's (EPA's) April 2015 Proposed Plan for amending the EPA's September 28, 2007, interim Record of Decision (ROD) for the First Operable Unit (OU1) of the Fulton Avenue site (Site) and provides the EPA's responses to those comments. The EPA considered all significant comments summarized in this document prior to selecting the remedy modifications documented in the ROD Amendment.

SUMMARY OF COMMUNITY RELATIONS ACTIVITIES

On April 24, 2015, the EPA issued, for public comment, a Proposed Plan in which the EPA identified its preferred modifications to the 2007 interim OU1 ROD for the Site. The public comment period on the Proposed Plan ran from April 24 through May 26, 2015, and included a May 12, 2015, public meeting at the Garden City Village Hall at 351 Stewart Avenue in Garden City, New York. The purpose of the public meeting was to inform interested citizens and local officials about the Superfund process, discuss and receive comments on the Proposed Plan, and respond to questions from the public and other interested parties. Notice of the Proposed Plan and comment period was published in the Garden City News on April 24, 2015. The public notice informed the public of the duration of the public comment period, the date and location of the public meeting, and the availability of the Proposed Plan and Administrative Record file supporting the proposed modification. The Proposed Plan and supporting documentation were available to the public at the EPA Region 2 Superfund Records Center in New York, New York, the Garden City Public Library in Garden City,

New York, and at the Shelter Rock Public Library in Albertson, New York. The Proposed Plan also was available to the public at http://www.epa.gov/region02/superfund/npl/fulton. Responses to the comments and questions received at the public meeting, along with other written comment received during the public comment period, are included in this Responsiveness Summary.

Attached to this Responsiveness Summary are the following Attachments:

Attachment 1 - Proposed Plan
Attachment 2 - Public Notice – Commencement of Public Comment Period
Attachment 3 - August 5, 2014 Public Meeting Sign-In Sheets
Attachment 4 - August 5, 2014 Public Meeting Transcript
Attachment 5 - Written Comment Submitted During the Public Comment Period

COMMENTS AND RESPONSES

Comment #1: Was contamination that could be treated with in-situ chemical oxidation (ISCO) found near the original source area at 150 Fulton Avenue?

Response: The area in the vicinity of 150 Fulton Avenue was extensively investigated and no source areas amenable to treatment with ISCO were identified. The investigation included the collection of groundwater and soil samples to depths of up to 60 feet below ground surface.

The purpose of the ISCO injections was to convert high levels of organic contamination into nonhazardous compounds, thereby accelerating restoration of the groundwater to federal or state maximum contaminant levels (MCLs). Investigations performed during the OU1 remedial design did not identify the location of any high level PCE source material in the shallow aquifer in the immediate vicinity of 150 Fulton Avenue. Therefore, this component of the interim OU1 remedy will not be implemented. As noted in the ROD Amendment, the EPA will continue to investigate additional areas for possible source material that may need to be addressed (by ISCO or another remedial approach), including source(s) of elevated PCE that has been observed in monitoring well GCP-01 located southwest and downgradient of 150 Fulton Avenue.

Comment #2: Are extraction and safety devices still being used to protect the people who work at 150 Fulton Avenue?

Response: Yes, the sub-slab ventilation system beneath 150 Fulton Avenue continues to operate in order to protect building occupants from exposure to volatile organic compound (VOC) vapors that may enter the building from beneath it.

Comment #3: Is Genesco paying for this remedy?

Response: The ROD Amendment is not an enforcement document and does not identify the party(ies) that will be responsible for implementing or paying for the remedy.

According to status reports filed with the U.S District Court for the Eastern District of New York, the Village of Garden City and Genesco have reached a settlement in principle to resolve a separate lawsuit in *Village of Garden City v. Genesco Inc. and Gordon Atlantic Corporation,* 07-CV-5244 (EDNY). It is the EPA's expectation that this settlement would provide for Genesco's payment for the operation, maintenance and monitoring ("O&M") of the treatment systems on Village water supply wells 13 and 14 for a period of 30 years. It should be noted that the EPA's modified remedy calls for the continued O&M of those wells until those wells no longer are impacted by contaminants above the MCLs for PCE and trichloroethylene (TCE), which may take longer than 30 years. The EPA anticipates that the government and Genesco will modify the existing consent judgment to secure Genesco's implementation of the modified remedy.

Comment #4: What are ARARs?

Response: "ARARs" is an acronym for "Applicable or Relevant and Appropriate Requirements," which are standards, requirements, criteria, or limitations of other federal and state environmental laws that are legally applicable or relevant and appropriate to a Superfund response action. A Superfund remedial action must comply with ARARs, unless a waiver is justified. ARARs for the Site include, for example, the MCLs for PCE and TCE established by the federal Safe Drinking Water Act's National Primary Drinking Water Regulations at 40 C.F.R. § 141.61, which are applicable to public water supplies including Village of Garden City wells 13 and 14.

Comment #5: Is the drinking water from Garden City's wells 13 and 14 safe?

Response: Yes. The treatment system on wells 13 and 14 effectively removes PCE, TCE and other VOCs from groundwater before it is distributed to the public. The drinking water from wells 13 and 14 is monitored by the Village of Garden City to ensure that it complies with applicable federal and New York State laws and regulations relating to water districts.

Comment #6: Minutes of a 2013 board meeting of the Nassau County Department of Health (NCDOH) state that EPA, the New York State Department of Environmental Conservation (NYSDEC), New York State Department of Health (NYSDOH) and NCDOH believe there is a definite danger of sending contamination into the Garden City water distribution system under the revised project. Please address that concern. The commenter also separately noted that, "In 2013, a revised proposal was made to flood the contaminated site while simultaneously using [Village water supply wells 13 and 14] to supply water."

Response: The referenced minutes provide the Nassau County Department of Health's summary of a discussion among the EPA, NYSDEC, NYSDOH, and NCDOH regarding a 2012 proposal by the Village of Garden City and Genesco Inc. to use wells 13 and 14 to remove PCE from the OU1 part of the aquifer for the purposes of restoring the groundwater and providing potable water. Use of the public supply wells to remove PCE from the aquifer was part of the Village of Garden City's and Genesco's original proposal to modify the 2007 ROD, as stated in March 29, 2012, slides that the Village and Genesco presented to the EPA. Those slides are publicly available in the Administrative Record. After discussing this proposal with NYSDEC, NYSDOH and NCDOH, however, EPA rejected the proposal to use wells 13 and 14 for aquifer restoration and instead determined that the interim OU1 remedy modification would focus on ensuring the continued provision of safe drinking water from wells 13 and 14. The well 13 and 14 removal and treatment of some of the contaminants from the aquifer is an incidental effect of the ROD Amendment.

The meeting minutes identify NCDOH's concern about the original Village/Genesco proposal. The minutes do not, however, mention the views of the EPA, NYSDEC or NYSDOH regarding that proposal.

The commenter's statement regarding a 2013 revised proposal to "flood the contaminated site" appears to reference the 2012 Village/Genesco proposal that was discussed in the 2013 NCDOH minutes. The proposal did not call for any flooding of the Site, however.

Comment #7: Why is EPA taking away the groundwater extraction and treatment system that was part of the remedy selected in the 2007 ROD?

Response: The groundwater treatment system was part of an interim remedy to address the PCE-dominant portion of the groundwater contamination plume. EPA has chosen to eliminate the groundwater extraction and treatment system from the interim OU1 remedy because PCE levels in groundwater reaching the intakes of wells 13 and 14 have been steadily declining since the summer of 2007, whereas those levels had been increasing prior to the 2007 ROD. The lower PCE levels in groundwater suggest that the extraction well system in the 2007 ROD is not needed on an interim basis to help prevent more highly elevated levels of contamination from reaching wells 13 and 14, because high levels of OU1 contamination are unlikely to be present in the future. The attenuating nature of the PCE-dominant portion of the groundwater plume also suggests that the source of the PCE in the OU1 portion of the groundwater plume is depleting, and that the highest levels of contamination may already have passed through the well head treatment systems at supply wells 13 and 14. The existing treatment systems at those wells have been and are expected to continue to effectively provide a safe drinking water supply.

The EPA currently is investigating TCE contamination as well as possible sources of PCE and TCE as part of the second operable unit (OU2) for the Site, and expects to issue a ROD for OU2 that will constitute the final groundwater remedy for the Site and that will serve as a final decision for OU1. Currently, groundwater restoration is one of the EPA's goals for the final Site remedy. The OU1 interim remedy will neither be inconsistent with, nor preclude, implementation of a final remedy for the Site.

Comment #8: If PCE levels in the aquifer have dropped, where did that contamination go?

Response: It appears that the source(s) of the OU1/PCE-dominant portion of the contaminant plume is attenuating, with the residual (or remaining) contamination moving downgradient (generally south-southwest) in the groundwater. Active source(s) of PCE mass have not been identified. Analytical results show an overall downward trend in contamination levels in the OU1 portion of the plume. Attenuation also is supported by Genesco's 2014 investigation of potential source areas in the vicinity of the former drywell at 150 Fulton Avenue, which did not identify any source areas in the shallow aquifer in the vicinity of the drywell (though EPA will continue to investigate additional areas for possible source material that may need to be addressed, such as potential source(s) of elevated PCE that has been observed in monitoring well GCP-01 located southwest and downgradient of 150 Fulton Avenue). A portion of the OU1 contamination is incidentally removed and treated by the well 13 and 14 treatment systems. See also the response to Comment #1, above.

Comment #9: What alternatives will EPA evaluate for restoring the aquifer in OU2?

Response: The EPA currently is performing a Remedial Investigation (RI) for OU2, which is the TCE-dominant portion of the contamination plume. The OU2 RI will identify the nature and extent of OU2 contamination, including potential sources of TCE and PCE contamination. The EPA will then prepare a Feasibility Study (FS) that will identify alternatives for restoring the aquifer (both the PCE- and TCE-dominant parts) and addressing sources of contamination that have been identified.

Comment #10: The 2007 Record of Decision states that certain wells would be evaluated to determine if the Village of Garden City's 2007 upgrade of the well 13 and 14 treatment system was "fully protective," whereas EPA states in its May 12, 2015, presentation slides that "Based on the evaluation to date, the [well 13 and 14] treatment system is effectively protecting the water supply." Is there a functional difference between the words "fully protective" and "effectively protecting"?

Response: No. Both statements refer to the treatment systems' ability to continue to provide water that is safe to drink.

Comment #11: Slide 21 from EPA's presentation at the May 12, 2015, public meeting depicts VOC concentrations in MW 21C. For 2006 and 2007, the slide shows a steep decline in VOC levels, followed by a sharp increase. The slide also shows a steep decrease in PCE levels beginning in late 2011. How can EPA be sure that there also wasn't a significant VOC increase in 2012 and/or 2013 if no data were collected during those years?

Response: The graph on slide 21 shows a steep decline in PCE levels from the November 9, 2011, sample (850 parts per billion, or "ppb") to the March 5, 2015, sample (1.3 ppb). Concentrations of TCE and cis-1,2-DCE show a similarly steep decline during that period. The commenter is correct in that no samples were collected from MW 21C between November 9, 2011, and March 5, 2015, and the contamination levels in MW 21C during that time therefore are unknown. It should be noted that additional sampling conducted on May 1, 2015, showed PCE at a concentration of 318 ppb in a sample from MW 21C.[1] The EPA is continuing to monitor VOC contamination levels in the OU1 portion of the contamination plume.

The sharp decreases and subsequent increases in PCE, TCE and cis-1,2-DCE levels in MW 21C in 2006-2007 generally coincided with the Village of Garden City's upgrades to wells 13 and 14, during which time the wells went from operational, to shut down, to operational. When wells 13 and 14 were re-started in 2007 following the upgrade, the contamination levels in MW 21C generally resumed the patterns observed in MW 21C prior to the shutdown. This suggests that the 2006-2007 concentrations seen in MW 21C were influenced by the shutdown and startup of wells 13 and 14.

Comment #12: If the EPA selects Alternative GW-2, which is less expensive than Alternative GW-1, can the EPA apply the

[1] The May 1, 2015, result was not included in EPA's May 12, 2015, slide presentation because EPA did not receive the validated data for that sample until June, 2015.

difference in cost to OU2 in order to speed up the OU2 investigation?

Response: Alternative GW-1 is the lower cost alternative that the EPA evaluated in the Proposed Plan. The lower projected cost of the amended OU1 remedy will not, however, result in additional funds becoming available for OU2. The EPA expects the OU1 remedy to be funded by one or more potentially responsible parties for the Site, whereas the EPA currently is using Superfund money (from general tax revenues) for the OU2 investigation. The EPA has sufficient funding to complete the OU2 RI and, because an RI is iterative in nature, the availability of additional funding would not necessarily accelerate that work. Additional groundwater sampling is expected later this year. At that time, the EPA will determine if sufficient information has been collected to make a final remedial decision for groundwater at the Site.

Comment #13: It looks like the EPA did not evaluate the costs of the remedial alternatives beyond 30 years. Isn't the remedy supposed to provide a long-term, permanent solution?

Response: The EPA estimated the costs of the remedy using a 30-year duration as a simplifying calculation for this interim remedy. The EPA also used a 30-year time frame to compare the costs of the two alternatives evaluated in the Proposed Plan. The EPA expects, however, that PCE and TCE levels in the aquifer may exceed their respective MCLs for greater than 30 years and, as a result, the treatment systems on Village supply wells 13 and 14 may need to be operated for greater than 30 years. It was not necessary for the EPA to estimate the projected costs of this interim remedy for greater than 30 years because the EPA plans to issue an OU2 ROD that will constitute the final groundwater remedy for the Site and serve as a final remedial decision for OU1. The EPA may use a duration of greater than 30 years in the OU2 ROD if PCE and TCE levels in the aquifer are expected to exceed their respective MCLs for greater than 30 years.

Comment #14: Why would the EPA select Alternative GW-1 when Alternative GW-2 will extract more contamination from the aquifer?

Response: The modified remedy continues to be an interim remedy until a final decision is made regarding groundwater restoration at the Site. The remedial action objectives of the selected remedy are to (i) minimize and/or eliminate the potential for future human exposure to Site contaminants via contact with contaminated drinking water, and (ii) help reduce migration of contaminated groundwater. The existing well head treatment systems at Village water supply wells 13 and 14 have been effectively removing contamination from the groundwater without the need for an additional groundwater extraction and treatment system. The ROD Amendment assumes the continued operation of Village wells 13 and 14 until those wells no longer are impacted by contaminants above the MCLs for PCE and TCE.

Restoration of the aquifer is not a remedial action objective for OU1 because the nature and extent of the contamination present in the OU1 and OU2 portions of the plume – including sources of TCE - have not yet been identified. The EPA therefore does not have sufficient information at this time to determine whether the aquifer at the Site can be fully restored, and will conduct additional investigations as part of OU2. Currently, groundwater restoration is one of the EPA's goals for the final Site remedy. The modified interim remedy is neither inconsistent with nor will it preclude a final groundwater restoration remedy for the Site.

Comment #15: Is there a risk now or in the foreseeable future that the OU1 groundwater contamination will reach other communities south of Village water supply wells 13 and 14?

Response: Some OU1 groundwater contamination has been detected in monitoring wells located downgradient of Village water supply wells 13 and 14. Specifically, since 2004 PCE-dominant contamination has been sporadically detected in samples collected from various groundwater elevations at MW 26, located approximately between Village water supply wells 13 and 14 and Franklin Square Water District wells 1 and 2. As shown in Table 2 of the ROD Amendment, TCE concentrations in MW 26 historically have been TCE-dominant. Samples collected from MW 26 in March and May 2015, however, show PCE concentrations that are higher than TCE concentrations in several of the MW 26 screening levels (MW 26B at 271 feet, MW26C at 325 feet, MW 26D at 350.5 feet,

26E at 377 feet and 26F at 410.5 feet).[2] PCE-dominant contamination has not been detected in MW 27, located south of MW 26 and between the Village's supply wells 13 and 14 and the Franklin Square supply wells, nor has PCE been detected in Franklin Square supply wells 1 and 2. These data suggest that Village supply wells 13 and 14 are helping to reduce the migration of the OU1 portion of the groundwater plume. EPA will continue to monitor contaminant levels in groundwater downgradient of Village supply wells 13 and 14.

Comment #16: Does the term "drinking water" include the water that we use for washing?

Response: Yes. For purposes of the ROD Amendment, "drinking water" includes all water from wells 13 and 14, including water used for drinking and washing.

Comment #17: Is the water from Village supply wells 13 and 14 used only by people who live near those wells, or does it go into a centrally-shared system?

Response: Village supply wells 13 and 14 are connected to an interconnected water distribution system for the Village of Garden City water district. Questions regarding which specific homes receive water from Village water supply wells 13 and 14 should be directed to the Village of Garden City Department of Public Works.

Comment #18: Please confirm the levels of TCE and PCE entering Village water supply wells 13 and 14 as shown on EPA's May 12, 2015 public meeting presentation slides. What are the MCLs for PCE and TCE?

Response: Figure 1 from EPA's presentation slides showed 320 ppb PCE and 50 ppb TCE in water entering Village well 13 before treatment in January 2014. Figure 2 showed water containing 190 ppb PCE and 33 ppb TCE entering well 14 before treatment in January 2014. The federal MCL for both chemicals is 5 ppb.

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[2] Screening levels MW 26B and MW26C were not sampled in March, 2015.

In July, 2015, 436 ppb PCE and 66.5 ppb TCE were detected in water entering well 13 before treatment, and 378 ppb PCE and 55.4 ppb TCE were detected in water entering well 14 before treatment.

Comment #19: Does EPA know what the litigation between the Village of Garden City and Genesco is about?

Response: In December 2007, the Village filed a lawsuit against Genesco Inc. and Gordon Atlantic Corporation seeking costs, damages, and injunctive relief associated with the contamination of Village of Garden City wells 13 and 14. That case is still pending in the federal district court for the Eastern District of New York. In a June 26, 2015, status report to the court, the Village of Garden City informed the court that it had reached a settlement in principle with Genesco, while some details remained to be finalized concerning the Village's claims against Gordon Atlantic Corporation.

Comment #20: Where is the OU2 investigation being conducted?

Response: The OU2 Remedial Investigation is mainly being conducted north and west of 150 Fulton Avenue, generally in the area north of Hempstead Turnpike, south of Hillside Avenue, east of Covert Avenue, and west of Roslyn Road.

Comment #21: EPA stated that deep monitoring wells are going to be installed during the OU2 investigation. Where will they be constructed?

Response: EPA expects that the deep monitoring wells planned for the next phase of the OU2 investigation will be installed north and west of the OU1 study area. The specific locations have not yet been determined.

Comment #22: Did Genesco Inc., or its agents review or provide any input into this Fulton Ave OU1 Proposed Plan prior to the May 12, 2015, public meeting?

Response: In March of 2012, Genesco and the Village of Garden City jointly proposed modifications to the EPA's 2007 Record of Decision that would eliminate the separate groundwater

extraction and treatment system while ensuring the continued operation of the wellhead treatment systems on Village water supply wells 13 and 14. The Village and Genesco also proposed the elimination of the in-situ chemical oxidation, or ISCO, component of the 2007 ROD. The Village's and Genesco's March 2012 proposal was the basis of the remedy modifications that EPA issued for public comment in its April 2015 Proposed Plan for the Site. The EPA, in consultation with the NYSDEC, NYSDOH and NCDOH, independently determined that the proposed modifications are appropriate, for the reasons explained in the ROD Amendment. The slides from the Village's and Genesco's March 29, 2012, presentation to the EPA are in the Administrative Record.

The EPA discussed major elements of the remedy modifications with Genesco and the Village of Garden City prior to the EPA's issuance of the Proposed Plan. The EPA did not, however, share the April 2015 Proposed Plan with either Genesco or the Village prior to the Proposed Plan being issued to the public for comment on April 24, 2015.

Comment #23: N.Y. State Senator Kemp Hannon supported a bill to contain the Grumman/Navy plume in Bethpage. Why not here in Garden City? Is it not better to have uncontaminated sources of drinking water than to try and decontaminate the source of drinking water before sending it to the community?

Response: The reasons for the EPA's decision to eliminate the groundwater extraction system from the interim remedy are explained in the ROD Amendment (see "Site History and Enforcement Activities" and "Summary of the Rationale for the Selected Remedy").

The pumping of Village water supply wells 13 and 14 provides an incidental benefit of helping to reduce the mobility of contaminants in the OU1 portion of the plume. Restoration of the aquifer is not a remedial action objective for OU1 because the nature and extent of the contamination present in the OU1 and OU2 portions of the plume – including sources of TCE - have not yet been fully identified. The EPA therefore does not have sufficient information at this time to determine whether the aquifer at the Site can be fully restored, and will conduct additional investigations as part of OU2. Nevertheless, groundwater restoration is one of the EPA's goals for the final Site remedy. It should be noted that analytical results show an overall downward trend in contamination levels in the OU1

portion of the plume, and the interim OU1 remedial action will assure the provision of a safe drinking water supply from Village water supply wells 13 and 14 while the Site-wide groundwater investigation continues.

ATTACHMENTS

Attachment 1 - Proposed Plan

Attachment 2 - Public Notice – Commencement of Public Comment Period

Attachment 3 – May 12, 2015, Public Meeting Sign-In Sheets

Attachment 4 - May 12, 2015, Public Meeting Transcript

Attachment 5 - Written Comments Submitted During Public Comment Period

Attachment 1

Proposed Plan

Fulton Avenue Superfund Site (OU1)

Garden City Park, Nassau County, New York

April 2015

EPA ANNOUNCES PROPOSED PLAN

This Proposed Plan describes the remedial alternatives considered for amending the interim remedial action selected in the U.S. Environmental Protection Agency's (EPA's) September 28, 2007, Record of Decision (ROD) for the first operable unit (OU1) of the Fulton Avenue Superfund Site. The Proposed Plan identifies the EPA's preferred amendment to the interim OU1 remedy for the Site and provides the rationale for this preference. The Proposed Plan was developed by the EPA in consultation with the New York State Department of Environmental Conservation (NYSDEC). The preferred interim remedial action described in this Plan addresses human and environmental risks associated with contaminants identified in the portions of the groundwater at the Site that are primarily contaminated with tetrachloroethylene (PCE).

In accordance with Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. § 9617(a), and Section 300.435(c)(2)(ii) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.435(c)(2)(ii), if the EPA decides to fundamentally alter a remedy selected in a ROD, the EPA's proposed changes must first be made available for public comment in a proposed plan before the EPA amends the ROD. The EPA is issuing this Proposed Plan as part of its public participation responsibilities under CERCLA Section 117(a) and Sections 300.430(f) and 300.435(c) of the NCP, 40 C.F.R. §§ 300.430(f) and 300.435(c).

The nature and extent of the contamination at the Site and the elements of the remedial alternatives summarized in this Proposed Plan are more fully described in the following documents:1) Remedial Investigation Report (RI) dated August 14, 2005, 2) the Feasibility Study Report (FS) report dated July 13, 2006, 3) FS Addendum dated February 15, 2007, 4) the OU1 ROD, 5) March 18, 2014, presentation slides prepared on behalf of the Village of Garden City, N.Y. (Village) and Genesco Inc. (Genesco), a potentially responsible party for the Site that identify proposed modifications to the OU1 ROD, 6) November 18, 2014, updated remedial alternative cost estimate prepared by Genesco, 7) January 14, 2015, cost estimate prepared by the Village, and 8) other documents contained in the OU1 Administrative Record and the OU1 Administrative Record Update for the Site. The EPA encourages the public to review these documents to gain a more comprehensive understanding of the Site and the Superfund activities that have been conducted.

In this Proposed Plan, the EPA proposes to eliminate the separate groundwater extraction and treatment system component of the 2007 remedy as well as the use of *in-situ* chemical oxidation (ISCO) in the shallow aquifer in the immediate vicinity of a facility located at 150 Fulton Avenue in Garden City Park, New York (the "Fulton Property"). The proposed remedy modification would

Mark Your Calendar

Public comment period:
April 24, 2015 – May 26, 2015
EPA will accept comments on the Proposed Plan during this public comment period.

Public Meeting:
May 12, 2015 at 7:00 p.m.
EPA will hold a public meeting to explain the Proposed Plan. The meeting will be held at Garden City Village Hall, 351 Stewart Avenue, Garden City, New York.

For more information, see the Administrative Record file, which is available at the following locations:

Shelter Rock Public Library
165 Searingtown Road
Albertson, New York 12548
Tel. (516) 883-7331
Hours: Monday - Friday 9:00am - 3:30pm

Garden City Public Library
60 Seventh Street
Garden City, New York 11530
Tel. (516) 742-8405
Hours: Monday and Friday 1:00pm - 6:00pm, Tuesday 1:00pm - 8:00pm, Wednesday and Thursday 10:00am - 8:00pm, Saturday 10:00am - 3:00pm

USEPA-Region 2
Superfund Records Center
290 Broadway, 18th Floor
New York, NY 10007-1866
(212) 637-4308
Hours: Monday-Friday, 9:00 a.m. - 5:00 p.m.

Written comments on this Proposed Plan should be addressed to:

Kevin Willis, Project Manager
United States Environmental Protection Agency
290 Broadway, 20th Floor
New York, NY 10007-1866
Telephone: (212) 637-4252
Fax: (212) 637-3966
E-mail: willis.kevin@epa.gov

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continue the operation and maintenance of the existing wellhead treatment systems for the Village potable water supply wells 13 and 14. The existing wellhead treatment systems consist of air strippers, which reduce concentrations of volatile organic compounds (VOCs) such as PCE in the treated drinking water to below the federal maximum contaminant levels (MCLs), followed by an activated carbon polishing step which further reduces VOC levels to below the detection limits of the required analytical method. Under this Proposed Plan, the air stripping systems will continue to be operated and maintained in order to protect the public from exposure to Site-related VOCs, including PCE, in groundwater entering those water supply wells, thereby providing a safe drinking water supply for the public. Vapor phase carbon treatment of the exhaust from the existing treatment systems will be added, if needed. The proposed remedy modification does not include maintenance of the activated carbon polishing step, which is separately implemented by the Village and which is not needed to maintain VOC levels below the MCLs. The proposed remedy modification also includes monitoring of groundwater entering wells 13 and 14 as well as monitoring groundwater upgradient, sidegradient and downgradient of wells 13 & 14.

The interim remedy described in this Proposed Plan is the *preferred* remedy for the Site. Changes to the preferred remedy or a change from the preferred remedy to another remedy may be made if public comments or additional data indicate that such a change will result in a more appropriate remedial action. The final decision regarding the selected interim remedy will be made after the EPA has taken into consideration all public comments on this Proposed Plan.

COMMUNITY ROLE IN SELECTION PROCESS

The EPA relies on public input to ensure that the concerns of the community are considered in selecting an effective remedy for each Superfund site. To this end, this Proposed Plan and the documents supporting this Proposed Plan are being made available to the public for a public comment period which begins on April 24, 2015 and concludes on May 26, 2015. See above for document repositories.

A public meeting will be held during the public comment period at the Garden City Village Hall, Garden City, New York on May 12, 2015, at 7:00 P.M. to further discuss with the public the reasons for this Proposed Plan, and to receive public comments.

Comments received at the public meeting, as well as written comments, will be documented in the responsiveness summary section of an amendment to the OU1 ROD, which will be the document that formalizes the EPA's selection of the modified interim remedy for OU1.

SCOPE AND ROLE OF ACTION

Site remediation activities are sometimes segregated into different phases, or operable units, so that remediation of different aspects of a site can proceed separately, resulting in a more expeditious cleanup of the entire site. The EPA also uses interim actions to address areas or contaminated media, such as groundwater, that ultimately may be included in the final Record of Decision for a site. Interim actions are used, for example, to institute temporary measures to stabilize a site or operable unit and/or prevent further migration of contaminants or further environmental degradation.

The Site is being addressed by the EPA in two operable units. This Proposed Plan describes the EPA's preferred interim action to address the portions of the groundwater at the Site that are primarily contaminated with PCE. The EPA has designated this action as OU1 of the Site remediation. The Fulton Avenue Site also includes trichloroethylene (TCE) contamination in groundwater surrounding the PCE-dominant portion of the groundwater contamination which is being addressed in OU1. The EPA currently is investigating the TCE contamination as well as possible sources of PCE and TCE as part of a second operable unit (OU2) for the Site. The EPA currently is performing an RI/FS for OU2, and expects to issue a ROD for OU2 that will constitute the final groundwater remedy for the Site and that will serve as a final decision for OU1. This OU1 interim remedial action will assure the provision of a safe drinking water supply from Village potable supply wells 13 and 14 while the Site-wide groundwater investigation continues.

With this Proposed Plan, the EPA is modifying the scope and role of the response action identified in the 2007 ROD, which included a groundwater extraction and treatment system that was intended to work towards restoring the groundwater to its beneficial use. (See 2007 ROD at p.4.) The ROD (p.23) indicated that the groundwater extraction system was expected to "more expeditiously meet chemical-specific ARARs [applicable or relevant and appropriate requirements] (e.g., MCLs) for the groundwater." Data collected since 2007, however, show that PCE levels are declining in the OU1 portion of the groundwater plume, and the treatment systems currently installed on wells 13 and 14 are effectively removing PCE and other VOCs from groundwater entering the wells. Further, modeling analyses conducted in 2012 by Genesco raised uncertainties as to whether the groundwater extraction system would significantly shorten the time to achieve the MCL for PCE in groundwater. Because of such uncertainty, and the fact that the groundwater extraction system is not needed to protect the potable water supply obtained from Village wells 13 and 14, the EPA is proposing to eliminate the extraction and treatment system from the OU1 interim remedy. Rather than implement the groundwater extraction system as part of this interim remedy, EPA proposes instead to address restoration of the groundwater in conjunction with its evaluation of a final remedial approach for the Site.

The 2007 ROD also called for the application of ISCO technology, in which an oxidant such as potassium permanganate would be injected underground near the former drywell at the Fulton Property, which is a major source of the OU1 PCE groundwater contamination. The purpose of the ISCO injections was to convert organic contamination into nonhazardous compounds, thereby accelerating restoration of the groundwater to the MCLs. Investigations performed during the OU1 remedial

design, however, did not identify PCE source material in the shallow aquifer in the immediate vicinity of the Fulton Property. Therefore, ISCO will not be applied to the shallow aquifer at that location. The EPA will continue to investigate additional areas for possible source material that may need to be addressed (by ISCO or another remedial approach), including source(s) of elevated PCE observed in nearby monitoring well GCP-01 located southwest and downgradient of the Fulton Property.

In the 2007 ROD, the EPA indicated that the OU1 portion of the contamination plume would be restored to its beneficial use when the TCE-dominant contamination is addressed in OU2. Because all sources of contamination present in the OU1 and OU2 portions of the plume – including sources of TCE - have not yet been identified, the EPA does not have sufficient information at this time to determine whether groundwater at the Site can be fully restored, and will conduct additional investigations as part of OU2. Currently, groundwater restoration is one of EPA's goals for the final Site remedy. The OU1 interim remedy will neither be inconsistent with, nor preclude, implementation of a final remedy for the Site.

SITE BACKGROUND

Site Description

The Site includes the 0.8-acre Fulton Property, all contamination emanating from the Fulton Property, and other contamination impacting the groundwater in the vicinity and downgradient of the Fulton Property including an overlapping TCE-dominant portion of the plume in the Upper Glacial and Magothy aquifers, and sources of TCE contamination impacting public supply wells in the Village and Franklin Square. EPA's OU2 RI/FS includes an investigation of TCE and other PCE sources.

The Fulton Property is owned by Gordon Atlantic Corporation, a potentially responsible party for the Site. It is located within the Garden City Park Industrial Area (GCPIA) in the Hamlet of Garden City Park, Town of North Hempstead, Nassau County, New York. A fabric-cutting mill operated at the Fulton Property from approximately January 1, 1965, through December 31, 1974, which involved dry-cleaning of fabrics with PCE. Currently, the Fulton Property is occupied by a digital imaging/business support company. EPA believes that a significant portion of the PCE groundwater contamination at the Site was caused by the disposal of PCE into a drywell on the Fulton Property.

There are about 20,000 people living within a mile of the Fulton Property. Residents within the area obtain their drinking water from public supply wells. The GCPIA is immediately adjacent to residential areas.

Site Geology/Hydrogeology

The Site is situated in the outwash plain on Long Island, New York. Approximately 500 feet of interbedded sands and limited clay lenses overlay Precambrian bedrock. There are three aquifers that exist beneath the Site, two of which are affected. The Upper Glacial aquifer is the surficial unit which overlies the Magothy aquifer. The Magothy is the primary source for public water in the area. No substantive clays have been observed between the Upper Glacial and Magothy aquifers within the areas studied to date.

Site History

Beginning in 1986, numerous investigations were conducted by the Nassau County Departments of Health and Public Works to identify the source(s) of VOCs impacting numerous public supply wells in Nassau County located downgradient of the GCPIA. Based on the results of these investigations, NYSDEC placed the Fulton Property on the Registry of Inactive Hazardous Waste Disposal Sites.

On March 6, 1998, the EPA placed the Site on the National Priorities List (NPL) of sites under CERCLA. At that time, NYSDEC was the lead regulatory agency overseeing the implementation of an RI/FS and an Interim Remedial Measure (IRM) described below.

Genesco conducted the IRM from August 1998 to December 2001 to remove contaminants from a drywell on the Fulton Property in order to prevent further contaminant migration into the groundwater and into the indoor air at the facility. During the IRM, contaminated soils were excavated, after which a soil vapor extraction (SVE) system was installed to address residual soil contamination from the bottom of the drywell. The system was operated until NYSDEC Technical and Administrative Guidance Memorandum soil cleanup levels were achieved. Over 10,000 pounds of PCE were estimated to have been removed from the source area during the operation of the SVE system. This action was approved by NYSDEC and the dismantling of the SVE system was authorized on January 2, 2002.

Following this action, Genesco installed a sub-slab ventilation system under the Fulton Property to protect occupants from exposure to VOC vapors that may enter the Fulton Property from beneath the building. This system remains in operation to protect the indoor air quality.

In 1999, under an Administrative Order with NYSDEC, Genesco contracted with an environmental consulting firm, Environmental Resources Management (ERM), to conduct an RI/FS. Between March 2000 and May 2003, 20 monitoring wells were installed and sampled in the RI/FS study area. The RI Report was approved by NYSDEC in November 2005. An FS Report was approved by NYSDEC on February 15, 2007. The EPA prepared an addendum to the FS Report in February 2007, and became the lead agency for the Site at the conclusion of the OU1 RI/FS process.

The Proposed Plan for OU1 at the Site was released by the EPA for public comment on February 23, 2007, and the public comment period ran from that date through March 31, 2007. The EPA selected the OU1 interim remedy in the 2007 ROD. The selected remedy included the following elements:

- ISCO treatment of source contamination at and near 150 Fulton Avenue;
- Construction and operation of a groundwater extraction and treatment system midway along the spine of the PCE-dominant portion of the contaminant plume;
- Evaluation of Village of Garden City's 2007 upgrade to treatment systems on wells 13 and 14 to determine whether the upgrade is fully protective;
- Investigation and remediation, if necessary, of vapor intrusion into structures within the vicinity of the Fulton Property; and
- Institutional controls to restrict future use of groundwater at the Site.

On September 10, 2009, the United States filed for public comment, in the United States District Court for the Eastern District of New York, a consent judgment in which Genesco agreed to implement the remedy selected in the 2007 ROD. Genesco began the remedial design of that remedy after the consent judgment was filed. The Village, which had filed its own lawsuit against Genesco and Gordon Atlantic Corporation, criticized the settlement in comments filed with the court and the consent judgment remains filed with the court but not entered. Discussions between and among EPA, Genesco, and the Village ensued.

In March of 2012, while the remedial design was underway, the Village and Genesco proposed modifications to the 2007 ROD that would, among other things, eliminate the separate groundwater extraction and treatment system while ensuring the continued operation of the wellhead treatment systems on Village water supply wells 13 and 14.

The EPA concluded that eliminating the separate groundwater extraction and treatment system from the OU1 remedy would be appropriate because PCE levels in groundwater reaching the intakes of wells 13 and 14, which had been increasing at the time of the ROD, instead have been declining since the summer of 2007. The lower PCE levels in groundwater suggest that the extraction well system contemplated in the 2007 ROD is not needed to help prevent more highly elevated levels of contamination from reaching wells 13 and 14, because such high levels of contamination are unlikely to be present in the future. The existing treatment systems at water supply wells 13 and 14 have been and are expected to continue to effectively provide a safe drinking water supply. The attenuating nature of the PCE-dominant portion of the groundwater plume indicates that the source of the PCE in the PCE-dominant portion of the plume may be depleting and that the highest levels of contamination may have already passed through the well head treatment systems at supply wells 13 and 14.

In addition, remedial design sampling conducted by Genesco's contractor in the area around 150 Fulton Avenue did not identify PCE source material in the shallow aquifer in the immediate vicinity of the former drywell into which the EPA believes PCE was historically disposed. The EPA has, however, identified fluctuating high levels of PCE (as high as approximately 50,000 parts per billion, or "ppb," in 1986) in groundwater in monitoring well GCP-01; this monitoring well is located on Atlantic Avenue approximately 400 feet southwest of the Fulton Property and monitors the shallow aquifer. While concentrations have fluctuated significantly over the sampling period, concentrations are generally declining. A sample collected in March 2015 contained 210 ppb PCE. High PCE levels detected in GCP-01

WHAT IS RISK AND HOW IS IT CALCULATED?

A Superfund baseline human health risk assessment is an analysis of the potential adverse health effects caused by hazardous substance releases from a site in the absence of any actions to control or mitigate these under current- and future-land uses. A four-step process is utilized for assessing site-related human health risks for reasonable maximum exposure scenarios.

Hazard Identification: In this step, the contaminants of concern (COC) at a site in various media (*i.e.*, soil, groundwater, surface water, and air) are identified based on such factors as toxicity, frequency of occurrence, and fate and transport of the contaminants in the environment, concentrations of the contaminants in specific media, mobility, persistence, and bioaccumulation.

Exposure Assessment: In this step, the different exposure pathways through which people might be exposed to the contaminants identified in the previous step are evaluated. Examples of exposure pathways include incidental ingestion of and dermal contact with contaminated soil. Factors relating to the exposure assessment include, but are not limited to, the concentrations that people might be exposed to and the potential frequency and duration of exposure. Using these factors, a reasonable maximum exposure scenario, which portrays the highest level of human exposure that could reasonably be expected to occur, is calculated.

Toxicity Assessment: In this step, the types of adverse health effects associated with chemical exposures and the relationship between magnitude of exposure and severity of adverse effects are determined. Potential health effects are chemical-specific and may include the risk of developing cancer over a lifetime or other non-cancer health effects, such as changes in the normal functions of organs within the body (*e.g.*, changes in the effectiveness of the immune system). Some chemicals are capable of causing both cancer and non-cancer health effects.

Risk Characterization: This step summarizes and combines outputs of the exposure and toxicity assessments to provide a quantitative assessment of site risks. Exposures are evaluated based on the potential risk of developing cancer and the potential for non-cancer health hazards. The likelihood of an individual developing cancer is expressed as a probability. For example, a 10^{-4} cancer risk means a one-in-ten-thousand excess cancer risk; or one additional cancer may be seen in a population of 10,000 people as a result of exposure to site contaminants under the conditions explained in the Exposure Assessment. Current Superfund guidelines for acceptable exposures are an individual lifetime excess cancer risk in the range of 10^{-4} to 10^{-6} (corresponding to a one-in-ten-thousand to a one-in-a-million excess cancer risk) with 10^{-6} being the point of departure. For non-cancer health effects, a hazard index (HI) is calculated. An HI represents the sum of the individual exposure levels compared to their corresponding reference doses. The key concept for a non-cancer HI is that a threshold level (measured as an HI of less than 1) exists below which non-cancer health effects are not expected to occur.

suggest the existence of PCE source material in that vicinity. The EPA expects to continue the investigation of potential source material.

SUMMARY OF SOIL AND GROUNDWATER SAMPLING

Soil

A focused RI, conducted in the 1990s by NYSDEC, identified a drywell immediately adjacent to the Fulton Property building as the primary source of the PCE-dominant contamination plume migrating from the Fulton Property. This drywell was connected to a pipe which received dry-cleaning waste from inside the building. The primary contaminant identified in drywell sediments, adjacent soil, and shallow groundwater beneath the drywell was PCE. TCE was also detected in soil at the Fulton Property at lower concentrations.

A sampling effort was performed in 2010 by Genesco's consultant, ERM, to identify PCE source materials in the vicinity of the Fulton Property that would be amenable to treatment with ISCO. However, source material was not found in the shallow (Upper Glacial) aquifer in that area. The EPA intends to investigate the potential existence of possible source material in the deeper Magothy aquifer below the Garden City Park Industrial Area as part of future investigations at the Site. The investigation of whether a deeper source of Site-related PCE contamination is present in the Magothy aquifer is beyond the scope of this Proposed Plan.

Genesco conducted additional investigatory work in order to identify a source or sources responsible for the high PCE concentrations seen in monitoring well GCP-01. The investigation, however, did not identify sources of that contamination. The EPA is continuing to investigate additional areas for possible sources that may need to be addressed.

Groundwater

The OU1 groundwater sampling program prior to the 2007 ROD included sampling of 20 groundwater monitoring wells located at the Site and analysis of samples for organic and inorganic compounds. The highest PCE concentration observed in monitoring well (MW) 21 prior to the ROD was 3,330 ppb detected in MW 21C in 2006. MW 21 is located approximately 1200 feet upgradient of Village wells 13 and 14.

Since the 2007 ROD, sampling of the monitoring wells along the OU1 portion of the plume, as well as data gathered by the Village during its operation of Village supply wells 13 and 14, show that concentrations of PCE have steadily diminished in the OU1 portion of the contaminant plume. For example, PCE concentrations in MW 21C have trended downward from the pre-ROD peak of 3,330 ppb in 2006 to 6.1 ppb PCE detected by EPA in June of 2013. More recently, sampling conducted by Genesco in March 2015 identified 1.5 ppb PCE in MW 21B and 1.3 ppb PCE in MW 21C, which are the lowest PCE levels detected in those well intervals since MW 21 was constructed in 2001. TCE concentrations in MW 21B and MW 21C have similarly experienced a decline, from 80.7 ppb in 2011 to 1.1 ppb in 2015 in MW 21B, and from 48.4 ppb in 2011 to 0.0 ppb (non-detect) in 2015 in MW 21C.

A downward trend has also been observed in Village wells 13 and 14 where the concentration of PCE decreased from a high of 1,020 ppb in June 2007 in well 13 to a low concentration of 170 ppb in May and November 2014 in well 14. Samples collected in April 2015 detected 436 ppb PCE in groundwater entering well 13, and 250 ppb PCE in groundwater entering well 14. It should be noted that there are fluctuations in the PCE levels entering wells 13 and 14, though a downward trend is clearly evident over the broader sampling period since 2007.

In MW 15A, located approximately midway between MW 21 and the Fulton Property, PCE levels declined from 1,120 ppb PCE in November 2011 to 243 ppb in March 2015. These and any future data will be utilized in the evaluation of a final groundwater remedy for the Site.

With respect to the current extent of the PCE-dominant groundwater contamination being addressed in OU1, sampling conducted since 2004 at MW 26, located generally between Village supply wells 13 and 14 and Franklin Square Water District wells 1 and 2, has sporadically shown low levels of PCE-dominant contamination (in 9 of 101 samples). The majority of the contamination in MW 26 generally has been TCE. When compared to 2011 analytical results, the March 2015 samples collected from MW 26 show higher PCE concentrations relative to TCE concentrations in several of the MW 26 screening levels (MW 26D at 350.5 feet, 26E at 377 feet and 26F at 410.5 feet), with a maximum 2015 PCE concentration of 42 ppb detected in MW 26F. PCE-dominant contamination has not been detected in MW 27, located south of MW 26 and between Village supply wells 13 and 14 and the Franklin Square supply wells, nor has PCE been detected in Franklin Square supply wells 1 and 2. These data suggest that Village wells 13 and 14 are helping to reduce the migration of the OU1 portion of the groundwater plume.

SUMMARY OF SITE RISKS

Human Health Risk Assessment

The purpose of the risk assessment is to identify potential cancer risks and noncancer health hazards at the Site assuming that no further remedial action is taken. A baseline human health risk assessment was performed during the OU1 RI to evaluate current and future cancer risks and noncancer health hazards and is summarized below. Data collected since the 2007 ROD do not change the conclusions of the OU1 risk assessment.

A four-step risk assessment process was used for assessing Site-related cancer risks and non-cancer health hazards. The process included: Hazard Identification of Chemicals of Potential Concern (COPCs), Exposure Assessment, Toxicity Assessment, and Risk Characterization.

A baseline risk assessment is an analysis of the potential adverse human health effects caused by hazardous-substance exposure in the absence of any actions to control or mitigate such exposure under current and future land uses.

The human-health risk estimates summarized below are based on reasonable maximum exposure scenarios and were developed by taking into account various conservative estimates about the frequency and duration of an individual's exposure to the COPCs for adults and children, as well as the toxicity of these contaminants. PCE and TCE are the COPCs for OU1.

The baseline risk assessment began with selecting COPCs in media that would be representative of Site risks. Since the area is served by municipal water, it is not likely that the groundwater underlying the Site will be used for potable purposes in the foreseeable future without proper treatment. However, since the aquifer system is designated as a sole-source aquifer, and the Site groundwater is being used as a source of drinking water, exposure to untreated groundwater through ingestion, inhalation and dermal contract was evaluated.

Based on this analysis, carcinogenic risk and/or noncarcinogenic hazards were above the acceptable carcinogenic risk (CR) range of 10^{-6} to 10^{-4} and the noncarcinogenic hazard index (HI) of 1 for the following chemicals and exposure pathways.

Population	Pathway	CR	HI
Adult resident – TCE and PCE	Ingestion/dermal absorption	3×10^{-3}	8
	Inhalation from shower	6×10^{-4}	NA
	Total	**4×10^{-3}**	**8**
Child resident – TCE and PCE	Ingestion/dermal absorption	2×10^{-3}	22
	Inhalation from shower	2×10^{-4}	NA
	Total	**2×10^{-3}**	**22**
Commercial Worker – TCE and PCE	Ingestion	7×10^{-4}	2.4

NA – Noncarcinogenic hazards were not estimated due to the lack of inhalation toxicity values for the COPCs.

These calculated risks to human health indicate that remedial action is warranted to reduce the risks associated with the observed contamination. The potential for vapor intrusion as an exposure pathway will be further evaluated.

The toxicity data and exposure assumptions that were used to estimate the potential risks and hazards to human health followed the Risk Assessment Guidance for Superfund used by the EPA. Although specific toxicity values and exposure assumptions may have changed since the time the risk assessment was completed, the risk assessment process that was used is consistent with current methodology and the need to take action is still warranted.

Ecological Risk Assessment

The potential risk to ecological receptors also was evaluated. For there to be an exposure, there must be a pathway through which a receptor (e.g., person, animal) comes into contact with one or more of the COPCs. Without a complete pathway or receptor, there is no exposure and, hence, no risk.

Based on a review of existing data, there are no potential exposure pathways for ecological receptors at the Site. As noted above, the Fulton Property itself is less than one acre in size and is located in the GCPIA within a highly developed area. The entire Fulton Property is paved or covered with buildings. The depth to groundwater (the medium of concern) is approximately 50 feet and is unlikely to affect any surface water bodies.

REMEDIAL ACTION OBJECTIVES

Remedial action objectives (RAOs) are specific goals to protect human health and the environment. These objectives are based on available information and standards such as ARARs for drinking water and groundwater, Site-specific risk-based levels, and the reasonably anticipated future land use for the Site (e.g., commercial/industrial or residential).

The following RAOs were established for OU1 in the 2007 ROD:

- Reduce contaminant levels in the drinking water aquifer to ARARs.

- Prevent further migration of contaminated groundwater.

The proposed change to the 2007 ROD is not inconsistent with the RAOs identified in the 2007 ROD, because the continued pumping and treatment of Village wells 13 and 14 will ensure a potable water supply, and this pumping and treatment provides the incidental benefit of helping to reduce migration of contaminated groundwater. While the proposed modification also will have the incidental benefit of reducing contaminant levels in drinking water, the primary purposes of this proposed modification are to prevent exposure to contaminated groundwater and to help reduce migration of contaminated groundwater.

The RAOs for this proposed change to the interim remedy are as follows:

- Minimize and/or eliminate the potential for future human exposure to Site contaminants via contact with contaminated drinking water.

- Help reduce migration of contaminated groundwater.

SUMMARY OF ALTERNATIVES

Common Elements for All Alternatives

Under the two alternatives presented in this Proposed Plan, the existing treatment systems on Village wells 13 and 14 would continue to operate and protect the public from contamination in the OU1 portion of the groundwater plume. Each alternative requires and includes the operation, monitoring and maintenance (O&M) of the existing treatment systems until wells 13 and 14 no longer are impacted by contaminants above the MCLs. Neither alternative requires any modification to the current pumping rates or volumes of water pumped by Village wells 13 and 14.

In addition, both alternatives include institutional controls that restrict future use of groundwater at the Site. Specifically, the Nassau County Sanitary Code regulates installation of private potable water supply wells in Nassau County.

The Fulton Property is zoned for industrial use, and the EPA does not anticipate any changes to the land use in the foreseeable future. If a change in land use is proposed, additional investigation of soils at the Fulton Property may be necessary to determine whether the change in land use could affect exposure risks at the property.

For each alternative, a Site management plan (SMP) would provide for the proper management of all OU1 remedy components, including institutional controls. The SMP would include: (a) O&M of Village wells 13 and 14 as well as monitoring of Site groundwater upgradient, sidegradient and downgradient of wells 13 and 14; (b) conducting an evaluation of the potential for vapor intrusion, and appropriate response action, if necessary, in the event of future construction at the Fulton Property; and (c) periodic certifications by the party(ies) implementing the remedy that any institutional and engineering controls are in place.

Each alternative also includes a vapor intrusion evaluation of structures that are in the vicinity of the Fulton Property and that could potentially be affected by the OU1 portion of the groundwater contamination plume. An appropriate response action (such as sub-slab ventilation systems) may be implemented based on the results of the investigation. The operation, maintenance and monitoring of the existing sub-slab ventilation system at 150 Fulton Avenue would continue under both alternatives.

Below is a brief description of the two alternatives considered in this Proposed Plan.

GW-1: Continued Operation of Existing Treatment Systems on Village Wells 13 and 14.

Capital Cost	$1,118,578[1]
O & M Cost	$2,920,610
Present Worth Cost	$4,039,188
Construction Time	N/A
Duration	30 years

This alternative relies upon the continued operation and maintenance of the existing air stripper treatment units on Village wells 13 and 14 in order to protect the public from exposure to hazardous substances in groundwater, and to provide a safe drinking water supply. The costs associated with this alternative include the costs of replacing existing air strippers as the equipment wears out. This alternative includes the addition of a vapor phase carbon unit if needed to capture VOCs being discharged from the air stripper treatment units. This alternative also includes monitoring of contamination in groundwater entering wells 13 and 14.

For cost estimating purposes, a 30-year time frame was assumed as the duration of this alternative. The EPA expects, however, that PCE and TCE levels in the groundwater will exceed their respective MCLs for greater than 30 years and, as a result, the treatment systems on Village wells 13 and 14 will need to be operated for greater than 30 years.

Because this alternative would result in contaminants remaining on Site above levels that would allow for unlimited use and unrestricted exposure, CERCLA requires that the Site be reviewed at least once every five years.

GW-2: Continued Operation of Existing Treatment Systems on Village wells 13 and 14, and Groundwater Extraction and Treatment

Capital Cost	$6,296,578
O & M Cost	$7,415,610
Present Worth Cost	$13,712,188
Construction Time	10 months
Duration	30 years

Alternative GW-2 was the remedy chosen in the 2007 ROD. This alternative includes a separate groundwater extraction and treatment system that would be constructed in the OU1 portion of the groundwater plume, upgradient of Village wells 13 and 14. In the ROD, the EPA anticipated that the system would be constructed in the "Estate" area of the Village, and would pump and treat groundwater for discharge into the existing infiltration

[1] The cost estimates in the 2007 ROD were refined during the design of the 2007 remedy.

basin at the Garden City Bird Sanctuary for recharge to groundwater.

The 2007 ROD included the application of ISCO technology to address potential PCE source material in the shallow aquifer in the vicinity of the Fulton Property. As explained above, however, during the remedial design, source material amenable to treatment with ISCO was not identified in the immediate vicinity of the Fulton Property. The cost estimate for GW-2, therefore, does not include the cost of the ISCO injections that were included in the ROD remedy.

For cost estimating purposes, a 30-year time frame was assumed as the duration of this alternative. The EPA expects, however, that PCE and TCE levels in the groundwater will exceed their respective MCLs for greater than 30 years and, as a result, the treatment systems on Village wells 13 and 14 and the separate groundwater extraction and treatment system will need to be operated for greater than 30 years.

Because this alternative would result in contaminants remaining on Site above levels that would allow for unlimited use and unrestricted exposure, CERCLA requires that the Site be reviewed at least once every five years.

EVALUATION OF ALTERNATIVES

In selecting a remedy for a site, the EPA considers the factors set forth in CERCLA ï 121, 42 U.S.C. ï 9621, by conducting a detailed analysis of the viable remedial alternatives pursuant to the NCP, 40 CFR ï 300.430(e)(9) the EPA's *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA* (OSWER Directive 9355.3-01), and the EPA's *Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents* (OSWER Directive 9200.1-23P) (July 1999). The detailed analysis consists of an assessment of the individual alternatives against each of nine evaluation criteria and a comparative analysis focusing upon the relative performance of each alternative against those criteria, as follows:

X Overall protection of human health and the environment addresses whether or not a remedy provides adequate protection and describes how risks posed through each exposure pathway (based on a reasonable maximum exposure scenario) are eliminated, reduced, or controlled through treatment, engineering controls, or institutional controls.

X Compliance with applicable or relevant and appropriate requirements (ARARs) addresses whether or not a remedy would meet all of the applicable or relevant and appropriate requirements of other federal and state environmental statutes and regulations or provide grounds for invoking a waiver.

X Long-Term effectiveness and permanence refers to the ability of a remedy to maintain reliable protection of human health and the environment over time, once cleanup goals have been met. It also addresses the magnitude and effectiveness of the measures that may be required to manage the risk posed by treatment residuals and/or untreated wastes.

X Reduction of toxicity, mobility, or volume through treatment evaluates an alternative's use of treatment to reduce the harmful effects of principal contaminants, their ability to move in the environment, and the amount of contamination present.

X Short-Term effectiveness addresses the period of time needed to achieve protection and any adverse impacts on human health and the environment that may be posed during the construction and implementation period until cleanup goals are achieved.

X Implementability considers the technical and administrative feasibility of implementing the alternative, including factors such as the relative availability of goods and services.

X Cost includes estimated capital and operation and maintenance costs, and net present-worth costs. Present worth cost is the total cost of an alternative over time in terms of today's dollar value. Cost estimates are expected to be accurate within a range of +50 to -30 percent.

X State acceptance. Considers whether the State agrees with the EPA's analyses and recommendations, as described in the RI/FS and Proposed Plan.

X Community acceptance will be assessed in the ROD, and considers whether the local community agrees with the EPA's analyses and preferred alternative. Comments received on the Proposed Plan are an important indicator of community acceptance.

The first two criteria above (overall protection of human health and the environment and compliance with ARARs) are known as “threshold criteria” because they are the minimum requirements that each response measure must meet in order to be eligible for selection as a remedy. The next five Superfund criteria (long-term protectiveness and permanence, reduction of toxicity, mobility, or volume through treatment, short-term effectiveness, implementability and cost) are known as “primary balancing criteria” and are factors with which tradeoffs between response measures are assessed so that the best option will be chosen, given site-specific data and conditions. The final two evaluation criteria (state acceptance and community acceptance) are called “modifying criteria” because new information or comments from the state or the community on the Proposed Plan may cause the EPA to modify the

preferred response measure or cause another response measure to be considered.

In accordance with EPA guidance, this modification of the OU1 remedial action is an interim remedy that will be protective of human health and the environment in the short term and is intended to provide adequate protection until a final remedy for the Site is implemented.

This section of the Proposed Plan evaluates the relative performance of each of the two remedial alternatives discussed above against the nine criteria.

Overall Protection of Human Health and the Environment

Both alternatives include the continued operation and maintenance of the existing treatment systems installed on Village wells 13 and 14 as an interim remedy, and as such overall protection would not be achieved until the final remedy for the Site is selected. Nevertheless, the treatment systems will continue to protect the public from exposure to PCE and other VOCs in the OU1 portion of the groundwater contamination plume by providing a safe drinking water supply for the Village. The institutional controls will further restrict exposure to contaminants in groundwater.

The groundwater extraction and treatment system in GW-2 is also an interim remedy and would remove some VOC contamination from groundwater upgradient of Village wells 13 and 14. Analyses performed during the remedial design, however, raised uncertainties as to whether the extraction system selected in the 2007 ROD would significantly shorten the time needed to reach the MCL for PCE in the OU1 portion of the groundwater plume. The EPA will further study the effectiveness of an extraction and treatment system as part of its evaluation of a final remedial approach for the Site.

Although GW-1 is not intended to restore the groundwater aquifer, the pumping of Village wells 13 and 14 followed by treatment of the pumped water will continue to have the incidental benefit of removing contaminants from groundwater. Similarly, the pumping of Village wells 13 and 14 will continue to help prevent the OU1 portion of the groundwater plume from reaching the Franklin Square Water District wells.

Compliance with ARARs

ARARs related to the Village wells 13 and 14 include the Safe Drinking Water Act, 42 U.S.C. §§ 42 U.S.C. §§ 300f - 300j-26 (SDWA) and New York State Sanitary Code at 10 NYCRR Subpart 5-1, which relates to public water supply systems. Under both alternatives, the wellhead treatment systems for Village wells 13 and 14 would continue to achieve ARARs which are the MCLs for PCE, TCE and other VOCs in treated water as required under the SDWA 10 NYCRR Subpart 5-1.

The effluent from the pump and treat system called for in GW-2 would also achieve the MCLs for PCE and TCE. Restoration of the groundwater to MCLs will be addressed as part of the final Site remedy in OU2, and is not within the scope of this interim response action. This Proposed Plan, therefore, does not identify remediation goals for PCE and TCE in the groundwater for OU1.

Long-Term Effectiveness and Permanence

As indicated above, interim remedies are intended to be protective of human health and the environment in the short term, and to provide adequate protection until a final ROD is issued. This interim remedy, therefore, is not intended to provide a permanent remedy for OU1.

For both alternatives, the O&M of the treatment systems on Village wells 13 and 14 will continue to protect the public from exposure to contaminants in groundwater entering those wells. The OU1 remedy will be consistent with, and not preclude, a final remedy for the Site.

Reduction of Toxicity, Mobility, or Volume through Treatment

Because this action does not constitute the final remedy for the Site, the statutory preference for remedies that employ treatment that reduce toxicity, mobility or volume as a principal element will be fully addressed by the final response action.

The pumping of wells 13 and 14 provides an incidental benefit of helping to reduce the mobility of contaminants in the OU1 portion of the plume. The groundwater extraction and treatment system in Alternative GW-2 would provide additional reduction in the toxicity, mobility, and volume of volatile organic contaminants in groundwater through removal and treatment of VOCs from the OU1 portion of the plume.

Short -Term Effectiveness

Alternative GW-1 would not result in short-term impacts to human health and the environment because no construction is involved with respect to the treatment systems on Village wells 13 and 14. The GW-1 groundwater treatment systems already are in place and are protecting the public from impacts to human health. Alternative GW-2 would potentially result in greater short-term exposure to workers who may come into contact with contamination during construction of the groundwater extraction and treatment system.

Installation of the extraction wells and associated piping for Alternative GW-2 would be completed in approximately 8-12 months. While efforts would be made to minimize the impacts, some disturbances would result from disruption of traffic, excavation activities on public and private land, noise, and fugitive dust emissions. Proper health and safety precautions and fugitive dust mitigation measures would help control these impacts.

Implementability

The technologies presented in Alternatives GW-1 and GW-2 have been used at other Superfund sites and are considered technically feasible.

The goods and services needed to implement GW-1 and GW-2 are readily available. Both alternatives are administratively implementable as well. No permits would be required for on-Site work pursuant to the permit exemption at Section 121(e)(1) of CERCLA, 42 U.S.C. § 9621(e)(1), although substantive requirements of otherwise-needed permits would be met.

Cost

The estimated capital, annual O&M (including monitoring), and present-worth costs for each of the alternatives are presented below:

Alternative	Capital Cost	Annual O&M	Present Worth
GW-1	$1,118,578	$2,920,610	$4,039,188
GW-2	$6,296,578	$7,415,610	$13,712,188

GW-1 has lower capital and O&M present worth costs than GW-2. The cost estimate for GW-1 is based on the "No Further Action – Limited Action" alternative described in the 2007 ROD, as updated by Genesco on November 18, 2014 and by the Village on January 14, 2015. The cost estimate for GW-2 is based on the cost estimate for the corresponding groundwater extraction and treatment system presented in the 2007 ROD, as adjusted based on updated cost information provided by Genesco during the remedial design of the 2007 remedy.

The cost estimates are order-of-magnitude engineering cost estimates that are expected to be within +50 to -30 percent of the actual cost of the project.

For cost estimating purposes, a 30-year time frame was assumed as the duration of each alternative. The EPA expects, however, that PCE and TCE levels in the aquifer will exceed their respective MCLs for greater than 30 years and, as a result, the treatment systems on Village wells 13 and 14 will need to be operated for greater than 30 years.

The GW-1 and GW-2 cost estimates do not include a separate cost item for the vapor intrusion response actions. Because the scope of the vapor intrusion-related work would be the same under both alternatives, the vapor intrusion response actions do not change the relative cost effectiveness of each of those alternatives. In addition, the costs of vapor intrusion response actions are relatively low, and the EPA does not expect the vapor intrusion response actions costs to affect whether the actual remedy costs are within +50% to -30% of the cost estimates.

State Acceptance

The State of New York supports the preferred remedy.

Community Acceptance

Community acceptance of the preferred remedy will be assessed in the ROD following review of the public comments received on this Proposed Plan.

PREFERRED ALTERNATIVE

The EPA's preferred alternative for amending the 2007 interim ROD is Alternative GW-1 (Continued Operation of Existing Treatment Systems on Village Wells 13 and 14). This alternative consists of the following:

- Continued O&M (including monitoring) of the treatment systems currently installed on Village wells 13 and 14 in order to protect the public from exposure to Site-related volatile organic compounds, including PCE, in groundwater entering those wells. The treatment systems will be maintained and replaced or upgraded as needed in order to ensure that water distributed to the public from wells 13 and 14 complies with ARARs (including SDWA and 10 NYCRR Subpart 5-1). Vapor phase carbon treatment of the exhaust from the existing treatment systems will be added, if needed. The proposed remedy modification does not include maintenance of the activated carbon polishing step, which is separately implemented by the Village and which is not needed to maintain VOC levels below the MCLs;

- A monitoring plan that will include groundwater sampling to monitor contaminant levels in groundwater at the Site, including monitoring of contamination that is entering wells 13 and 14, monitoring of groundwater upgradient, sidegradient and downgradient of wells 13 and 14, and graphic depictions of the results;

- Institutional controls that restrict future use of groundwater at the Site. Specifically, the Nassau County Sanitary Code regulates installation of private potable water supply wells in Nassau County. The Fulton Property is zoned for industrial use, and the EPA does not anticipate any changes to the land use in the foreseeable future. If a change in land use is proposed, additional investigation of soils at the Fulton Property may be necessary to determine whether the change in land use could affect exposure risks at the property;

- A vapor intrusion evaluation of structures that are in the vicinity of the Fulton Property and that could potentially be affected by the OU1 portion of the groundwater contamination plume. An appropriate response action (such as sub-slab ventilation systems) may be implemented based on the results of the investigation. The operation, maintenance and monitoring of the existing sub-slab ventilation system at 150 Fulton Avenue would continue; and

- A site management plan (SMP) that would provide for the proper management of all OU1 remedy components, including institutional controls. The SMP would include: (a) O&M of Village wells 13 and 14 as well as monitoring of Site groundwater upgradient, sidegradient and downgradient of wells 13 and 14; (b) conducting an evaluation of the potential for vapor intrusion, and an appropriate response action, if necessary, in the event of future construction at the Fulton Property; and (c) periodic certifications by the party(ies) implementing the remedy that any institutional and engineering controls are in place.

The preferred alternative may change in response to public comments or new information.

RATIONALE FOR PREFERRED ALTERNATIVE

Because this is an interim remedy, the GW-1 alternative would ensure the protection of the public water supply until a final remedy that addresses the groundwater is selected for the Site. Contamination levels in groundwater entering Village wells 13 and 14 will be monitored, and the treatment systems will be maintained and replaced or upgraded as needed in order to ensure that water distributed to the public from Village wells 13 and 14 complies with ARARs.

Alternative GW-1 provides the best balance of trade-offs between the two alternatives with respect to the balancing criteria discussed above. The EPA believes that the preferred alternative will be protective of human health and the environment until a final remedy is selected for the Site, will comply with the ARARs identified for this interim action, and is cost-effective. Although this interim action is not intended to address fully the statutory mandate for compliance with ARARs, overall protection, permanence, and treatment to the maximum extent practicable, this interim action does utilize treatment at the Village wells, and thus supports part of the statutory mandate.

The preferred alternative GW-1 is more cost-effective than GW-2. The GW-2 extraction and treatment system has a present-worth cost of approximately $13.7 million, without fully restoring the aquifer. GW-1 also would have fewer short-term impacts to workers and the community, and is more readily implementable because it does not involve the construction of an extraction and treatment system. The well head treatment systems of Alternative GW-1 are in place and, therefore, are already protecting the public from drinking water impacts to human health. The EPA expects that before the ROD is issued the Village and Genesco will reach an agreement that will ensure the long-term O&M of the Village well 13 and 14 treatment systems.

The EPA expects that PCE and TCE levels in the aquifer will exceed their respective MCLs for greater than 30 years and, as a result, the treatment systems on Village wells 13 and 14 will need to be operated for greater than 30 years.

The continued operation of Village wells 13 and 14 will continue to help reduce migration of the OU1 portion of the groundwater plume toward the Franklin Square Water District wells. The Village wells 13 and 14 treatment systems also will have the incidental benefit of removing and treating contaminants in groundwater that enters those wells, and thereby reducing the mass and mobility of VOCs in the OU1 part of the groundwater plume.

The environmental benefits of the preferred remedial alternative may be enhanced by employing design technologies and practices that are sustainable in accordance with the EPA Region 2's Clean and Green Energy Policy, available at: http://epa.gov/region2/superfund/green_remediation.

EPA expects the preferred alternative to satisfy the statutory requirements of CERCLA § 121(b), as follows: Based on information currently available, the preferred alternative, GW-1, is protective of human health and the environment in the short term and is intended to provide adequate protection until a final remedy is implemented for the Site, complies with those federal and state requirements that are applicable or relevant and appropriate for this limited-scope action, and is cost-effective. The preferred alternative, therefore, meets the threshold criteria, and provides a better balance of tradeoffs than alternative GW-2. Because this action does not constitute the final remedy for the Site, the statutory preference for remedies that employ treatment that reduce toxicity, mobility or volume as a principal element will be fully addressed by the final response action. Subsequent actions will be evaluated to address fully the threats posed by conditions at the Site. Because this remedy will result in hazardous substances remaining on-Site above health-based levels, a review will be conducted to ensure that the remedy continues to provide adequate protection of human health and the environment within five years after commencement of the remedial action. Because this is an interim action, review of this remedy and the Site will be ongoing as the EPA develops the final Site remedy.

Attachment 2

Public Notice – Commencement of Public Comment Period

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY INVITES PUBLIC COMMENT ON A PROPOSED PLAN FOR THE FULTON AVE. SUPERFUND SITE GARDEN CITY PARK, NASSAU COUNTY, NEW YORK

The U.S. Environmental Protection Agency (EPA) announces the opening of a **30-day comment period** on a Proposed Plan and preferred interim cleanup alternative for the first operable unit (OU1) of the Fulton Ave Superfund site (Site), located in and near Garden City Park, Nassau County, New York. In the Proposed Plan, EPA proposes to amend EPA's 2007 Record of Decision (ROD), in which EPA selected an interim OU1 cleanup for the Site. The comment period **begins on April 17, 2015 and ends on May 22, 2015.** As part of the public comment period, EPA will hold a **Public Meeting on Thursday, May 12, 2015 at 7:00 PM** at the **Garden City Village Hall, Garden City, NY 11531**. To learn more about the meeting you can contact Ms. Cecilia Echols, EPA's Community Involvement Coordinator, at 212-637-3678 or 1-800-346-5009 or visit our website at www.epa.gov/region2/superfund/npl/fultonave.

The Fulton Ave. Superfund site is listed on the Superfund National Priorities List. The Proposed Plan provides EPA's rationale for the proposed modification to the 2007 ROD, including a description of information obtained by EPA since the 2007 ROD was issued and that supports the proposed modification.

The preferred cleanup alternative includes:

- Ensuring the continued provision of well-head treatment on Garden City Water District Wells 13 and 14;
- Monitoring of contaminant levels in groundwater;
- Evaluation and appropriate response actions of potential vapor intrusion into buildings in the vicinity of 150 Fulton Avenue in Garden City Park, New York; and
- Elimination of the groundwater extraction and treatment system and the in-place treatment of groundwater contamination in the shallow aquifer near 150 Fulton Avenue, as called for in the 2007 ROD.

During the **April 16, 2015 Public Meeting,** EPA representatives will be available to further elaborate on the reasons for recommending the preferred interim cleanup alternative for OU 1. Public comments will be accepted at the meeting.

Site-related documents including the Proposed Plan, 2007 ROD, Remedial Investigation Report, Feasibility Study Report, 30% Remedial Design, and other Site-related documents are available for public review at the information repositories established for the Site at the following locations:

Village of Garden City Public Library, 60 Seventh St., Garden City, NY 11530
(845) 221-9943 Hours: Mon. - Thurs., 10am - 8pm; Fri., 10am - 6pm; Sat., 10am - 5pm

USEPA Region 2: Superfund Records Center, 290 Broadway, 18th Floor, New York, NY 10007-1866,
(212) 637-4308 Hours: Mon. - Fri., 9am - 5pm

EPA relies on public input to ensure that the selected remedy for each Superfund site meets the needs and concerns of the local community. It is important to note that although EPA has identified a preferred cleanup alternative for the Site, no final decision will be made until EPA has considered all public comments received during the public comment period. EPA will summarize these comments along with EPA's responses in a Responsiveness Summary, which will be included in the Administrative Record file as part of an amended Record of Decision for OU1. **Written comments and questions regarding OU1 of the Fulton Ave. Superfund site, postmarked no later than May 12, 2015 may be sent to:**

Mr. Kevin Willis, Remedial Project Manager
U.S. Environmental Protection Agency
290 Broadway, 20th Floor
New York, New York 10007-1866
Telefax: (212) 637-3966
Email: willis.kevin@epa.gov

The Garden City News Friday, A

INVITES PUBLIC COMMENT ON A PROPOSED PLAN FOR THE FULTON AVENUE SUPERFUND SITE GARDEN CITY PARK, NASSAU COUNTY, NEW YORK

The U.S. Environmental Protection Agency (EPA) announces the opening of a **30-day comment period** on a Proposed Plan and preferred interim cleanup alternative for the first operable unit (OU1) of the Fulton Avenue Superfund site (Site), located in and near Garden City Park, Nassau County, New York. In the Proposed Plan, EPA proposes to amend EPA's 2007 Record of Decision (ROD), in which EPA selected an interim OU1 cleanup for the Site. The comment period **begins on April 24, 2015 and ends on May 26, 2015.** As part of the public comment period, EPA will hold a **Public Meeting on Thursday, May 12, 2015 at 7:00 PM** at the **Garden City Village Hall, Garden City, NY 11531.** To learn more about the meeting you can contact Ms. Cecilia Echols, EPA's Community Involvement Coordinator, at 212-637-3678 or 1-800-346-5009 or visit our website at www.epa.gov/region2/superfund/npl/fulton/.

The Fulton Avenue Superfund site is listed on the Superfund National Priorities List. The Proposed Plan provides EPA's rationale for the proposed modification to the 2007 ROD, including a description of information obtained by EPA since the 2007 ROD was issued and that supports the proposed modification.

The preferred cleanup alternative includes:

- Ensuring the continued provision of well-head treatment on Garden City Water District Wells 13 and 14;
- Monitoring of contaminant levels in groundwater;
- Evaluation and appropriate response actions of potential vapor intrusion into buildings in the vicinity of 150 Fulton Avenue in Garden City Park, New York; and
- Elimination of the groundwater extraction and treatment system and the in-place treatment of groundwater contamination in the shallow aquifer near 150 Fulton Avenue, as called for in the 2007 ROD.

During the May 12, 2015 Public Meeting, EPA representatives will be available to further elaborate on the reasons for recommending the preferred interim cleanup alternative for OU1. Public comments will be accepted at the meeting.

Site-related documents including the Proposed Plan, 2007 ROD, Remedial Investigation Report, Feasibility Study Report, 30% Remedial Design, and other Site-related documents are available for public review at the information repositories established for the Site at the following locations:

Village of Garden City Public Library, 60 Seventh St., Garden City, NY 11530 (845) 221-9943 Hours: Mon. - Thurs., 10am - 8pm; Fri., 10am - 6pm; Sat., 10am - 5pm

USEPA Region 2- Superfund Records Center, 290 Broadway, 18th Floor, New York, NY 10007-1866, (212) 637-4308 Hours: Mon. - Fri., 9am - 5pm

EPA relies on public input to ensure that the selected remedy for each Superfund site meets the needs and concerns of the local community. It is important to note that although EPA has identified a preferred cleanup alternative for the Site, no final decision will be made until EPA has considered all public comments received during the public comment period. EPA will summarize these comments along with EPA's responses in a Responsiveness Summary, which will be included in the Administrative Record file as part of an amended Record of Decision for OU1. **Written comments and questions regarding OU1 of the Fulton Avenue Superfund site, postmarked no later than May 26, 2015 may be sent to:**

Mr. Kevin Willis, Remedial Project Manager
U.S. Environmental Protection Agency
290 Broadway, 20th Floor
New York, New York 10007-1866
Telefax: (212) 637-3966

Attachment 3

May 12, 2015, Public Meeting Sign-in Sheets

(Private home and email addresses redacted)

EPA

Fulton Avenue Superfund Site
Public Meeting – Tuesday, May 12, 2015 @ 7:00pm
Garden City Village Hall
351 Stewart Avenue, Garden City, New York

PLEASE PRINT CLEARLY

NAME	ADDRESS (with Zip Code)	E-mail	Representing
John Swartwout	625 Broadway Albany, NY 12233-7015	john.swartwout @dec.ny.gov	NYSDEC
CYNTHIA BROWN	(b) (6)		self
Leo Stimmler			self
Janet Blohm			self
Stephen McKinney			c.c.
Kathleen Auro			

EPA

Fulton Avenue Superfund Site
Public Meeting – Tuesday, May 12, 2015 @ 7:00pm
Garden City Village Hall
351 Stewart Avenue, Garden City, New York

PLEASE PRINT CLEARLY

NAME	ADDRESS (with Zip Code)	E-mail	Representing
Lisa K. Voyce	HDR One International Blvd. Mahwah, NJ	lisa.voyce@hdrinc.com	HDR
EQUATA OCHERBY	NYSDOH CORNING TOWER	[illegible]	NYSDOH
JAMES BAKER	(b) (6)		GC EAB
Laurence Quinn			GC EAB
Nick Eriscopia			Mayor

Attachment 4

May 12, 2015, Public Meeting Transcript

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
----------x

FULTON AVENUE SUPERFUND SITE

AMENDMENT TO FIRST OPERABLE UNIT

PUBLIC MEETING
----------x

351 Stewart Avenue
Garden City, New York

May 12, 2015
7:25 p.m.

PRESENTERS:

CECILIA ECHOLS,
Community Involvement Coordinator

SAL BADALAMENTI,
Chief, Eastern NY Remedial Section

KEVIN WILLIS,
Remedial Project Manager

DOUGLAS L. FISCHER,
Assistant Regional Counsel

MS. ECHOLS: Hello. My name is Cecilia Echols. We are here, EPA is here about the Fulton Avenue Superfund site. I am the community involvement coordinator for the site. Sal Badalamenti, is the Chief of the Eastern New York Remedial Section. Kevin Willis, he is the Remedial Project Manager, and we have Doug Fischer, he is our Assistant Regional Counsel.

Tonight's meeting is about the proposed modifications to EPA's 2007 cleanup decision. In April of 2015 a proposed plan was prepared which proposes an amendment to EPA's 2007 Record of Decision, which we call ROD, in which EPA selected an interim cleanup approach for the first operable unit of the site. A public notice was issued on April 24, 2015, and we will accept public comment until May 26.

EPA will select a ROD amendment after all public comments

are considered and EPA will respond to the comments in a respnsiveness summary to be included with the ROD amendment.

The Fulton Avenue site has two operable units. The Fulton Avenue site cleanup is being addressed as two separate operable units. Tonight's meeting is about the First Operable Unit which is groundwater, primarily contaminated with the dry cleaning solvent tetrachloroethene, which is called PCE.

The Second Operable Unit, EPA is separately conducting the second Operable Unit which is an investigation of groundwater primarily contaminated with the solvent, trichloroethylene, TCE, which surrounds and overlaps Operable Unit 1.

This proposed plan addressed the interim remedy for OU1.

Now we will have Sal

Badalamenti, who will give an overview.

MR. BADALAMENTI: This project is being undertaken under the Comprehensive Environmental Response, Compensation, and Liability Act, CERCLA, otherwise known as the Superfund law, which was prompted by, if you recall, what happened with the Love Canal. That prompted its passage by Congress in 1980. It provides for federal funds for cleanup at hazardous sites and for both long-term remedial action and short-term removal and emergency cleanups. It also empowers the EPA to compel potentially responsible parties to pay for or conduct Superfund response actions.

The process is very well defined. It starts with a site being discovered and ranked according to several hazardous site factors and placed on the National Priorities List. A remedial

investigation and feasibility study is conducted to determine the extent of the contamination and what the alternatives are to address it.

The proposed plan is then prepared for whatever is the appropriate remedy for the site. At the point we are at on this site right now we have issued a proposed plan and the next step before consideration will be public comments tonight which will be included in the preparation of a Record of Decision, which documents the agency's decision on what the appropriate remedy for the site will be. That is decided in coordination with the State of New York, the State Health Department, the Department of Environmental Conservation, as well as the next step for a remedial design project, the remedial reaction implementation procedure after any construction is completed.

Then there is an operation and maintenance phase and when eventually the site achieves all the remedial action objectives, and then the site is delisted from the National Priorities List.

That's the entire process. It takes some amount of time to get through it and that's where we are tonight. With that, we can continue with tonight's specifics.

MR. WILLIS: If anybody has any questions, we will answer them later, but this is the study area. We are talking about the site background.

A fabric-cutting mill operated at 150 Fulton Avenue in Garden City Park from January 1965 until December of 1974. During operations, PCE was disposed of in a drywell located beneath the parking lot of the facility. In September of 1997, Genesco Inc., a former owner/operator of 150 Fulton Avenue

and a PRP for the site, entered into a consent order with the New York State Department of Environmental Conservation to perform a remedial investigation and a feasibility study and an Interim Remedial Measure.

March 6, 1998, EPA placed the site on the National Priorities List under CERCLA. In December of 2001, Genesco completed the IRM, which was to clean up the soil around the drywell where the PCE were originally deposited.

After the IRM, Genesco installed the sub-slab depressurization system basically slotted pipes underneath the building to make sure that the people in the building were safe from anything that was left over. The system still remains in operation.

The remedial investigation went on from 1998 until 2005 and

included the sampling of approximately 70 monitoring wells that were partially installed before and then, during the investigation, when things got a little more defined, the RI identified unacceptable human health risks but no ecological risks from the exposure to untreated groundwater.

The existing treatment systems on the Village of Garden City supply wells 13 and 14 continue to protect the public from exposure to the most contaminated groundwater that does migrate down to those wells.

This was drilling, monitoring the well; this is sampling the monitored well.

In 2007 we came into this room and proposed a remedy. We became the lead agency for the site in February of 2007. We ultimately issued a Record of Decision on September 28, 2007. The Record of

Decision included a number of treatment remedial options:

in-situ chemical oxidation for source contamination that was still in the vicinity of 150 Fulton Avenue; partial ground water extraction and treatment system midway between 150 Fulton Avenue and Village of Garden City wells 13 and 14; evaluation of the Village of Garden City's 2007 upgrade to the treatment systems on wells 13 and 14 to determine whether the upgrades were fully protective.

Based on evaluation, to date, the treatment system is effectively protecting the water supply, and investigation and remediation, if necessary, of vapor intrusion into structures within the vicinity of the 150 Fulton Avenue property and in place institutional controls to restrict future use of groundwater at the site.

September 10, 2009, the

United States files in the United States District Court for a proposed consent judgment in which Genesco agreed to implement the 2007 ROD.

The Village of Garden city filed public comments expressing concerns about the proposed settlement.

In 2012, the Village of Garden City and Genesco came to EPA and proposed a remedy modification. Since 2012, the proposed remedy modification has been discussed among U.S. EPA, Genesco and the Village. It's been a long conversation and a settlement is not yet approved by the Court.

MR. FISCHER: Can I expand a bit, Kevin? The Village filed comments expressing its concern about the proposed settlement agreement. Most of the Village's concern was focused on their concern that high levels of contaminants in the groundwater would overwhelm the

treatment capacity of the treatment system on Village wells 13 and 14, but about the time that EPA issued the Record of Decision, we found that the contamination levels in the groundwater started to decline, so we started having discussions with the Village and Genesco about the implication of these low and declining groundwater contaminant levels that, in turn, led to the Village again proposing the remedy modification we are going to be discussing later on this evening.

Can we talk a little about the decline in the contaminant levels that we are seeing?

MR. WILLIS: The groundwater sample data since the ROD has shown, like Doug says, a continued lowering of the contamination. In 2006, at monitoring well 21C, which is just across Stuart Avenue from the public supply wells. Contamination in 2006 was 3.3 parts per million or

approximately 3,303 parts per billion. In the last round of groundwater sampling it was down to 1.3. That was a dramatic drop in this last ground sampling.

A month ago we asked Genesco to go out and resample and the results are just starting to come in again and it looks like it's stabilizing back to what we had expected before; there is contamination that is slightly higher in monitoring well 21C; not all the way down to that 1.3 parts per billion, which is more like what we will expect.

MR. DE FRANCO: Joe De Franco from Nassau County Department of Health. I want to know how deep that well was.

MR. WILLIS: Rather quickly, that's about 400 feet deep.

The Village of Garden City wells 13 and 14, the concentration of PCE in the wells are declining,

although still above the federal MCL drinking water standard of 5 ppb.

Monitoring well GCP-01 up near the site is a well that has PCE concentrations that are variable, but still above MCL. We haven't quite figured out what is going on with that. We are going to have our emergency people go and do sampling around this area and we actually have gotten funds, so sometime in the near future we will be looking at what is going on in that area.

I will cover a bit of a discussion about this area a little later.

MR. STIMMLER: In the first sentence there it says the wells are declining, but there are still people drinking water that is above the maximum.

MR. WILLIS: No, the drinking water is considered safe by EPA and the water district.

Additional monitoring, well

sampling is being performed to monitor the downward trend in contamination levels.

This is monitoring well 21C. This shows you how the last couple of years, the last few years, this is 2009, '10 and '11 and the levels are trailing off basically since the ROD. It's showing that the levels are turning downward.

This is a compilation graph of all the data that we have. This one is well 13, Village of Garden City 13. It shows that this is the level that it can treat to remove these PCE levels and there is essentially room, it's being treated. The green line is being treated.

MS. BROWN: Can I ask --

MS. ECHOLS: Keep the comments until the end.

MR. WILLIS: This would be TCE that we are talking about as well. There's less contamination

for this Operable Unit, this the higher PCE downward contamination. This is the same graph for well 14. PCE levels pumping -- I think where you are talking about, that line right there, that's how much is being pumped in. That is the maximum that we can pump.

Going back to what we were planning on doing for the 2007 ISCO source investigation. In the 2007 ROD called for ISCO treatment for remaining source material in the shallow aquifer around 150 Fulton Avenue.

Post-ROD investigation: During the remedial design, work did not identify source material at that location that we can apply this treatment to. We have had them go out on two separate occasions to look all through the area on a rather tight grid and we couldn't find anything that we could apply this treatment to. Without having

source material there, you would be putting this very strong purple chemical into the ground and if it did not have something to work against, it would end up in the water supply.

MS. BROWN: Cynthia Brown. I thought you identified one of the problems at the 150 Fulton as causing part of the plume.

MR. WILLIS: When we got in there to look for materials that we could treat, it wasn't there.

MS. BROWN: But you are still using extraction and safety devices for the people who work there. It's still in operation.

MR. WILLIS: As a precautionary matter.

MR. SHARF: Steve Sharf. ISCO is a strong laboratory chemical that you put into the ground; so that reacts with certain kinds of contamination and without that kind of source material it does not go

away and it ends up migrating into your water supply.

MR. WILLIS: This is the grid that I was talking about. 150 Fulton Avenue is this building here and they did some rather extensive sampling all around that area trying to find something to apply chemical to, and nothing was found to do.

MS. BROWN: Is that going out? Are the circles going out? I can't read the map, I don't understand it.

MR. WILLIS: If you are going up Nassau Boulevard, that is the 7-Eleven right across the railroad station. This is the street. It's immediately after the railroad trestle there. By the tracks, the railroad trestle.

MS. BROWN: That is north?

MR. WILLIS: That's north of the railroad tracks.

March of 2012, the Village of Garden City proposed modification to

the 2007 ROD to eliminate the separate groundwater extraction and treatment system while ensuring the continued operation of the Village of Garden City's wells 13 and 14 treatment systems, and eliminate the ISCO component of the remedy. This was at approximately 30 percent, this was at approximately 30 percent design level.

They have done a lot of work up to this point. Why is EPA proposing to amend the ROD? Well no source area is identified for the ISCO treatment. The post-2007 data shows that there is a downward trend in the PCE; there's indication that the contaminants in the plume may be depleting.

Existing treatment systems on the Village of Garden City wells 13 and 14 effectively removed the PCE's and other VOC's. The extraction system is not needed to protect the Village water supply from these

contaminants to provide safe water.

EPA consulted with the New York State Department of Environmental Conservation, New York State Department of Health, Nassau County Department of Health and within the EPA headquarters, the research EPA does independently, it agrees with the proposed amendment that was brought to the site.

There is some uncertainty as to whether the groundwater extraction system would significantly shorten the time to achieve the MCL for PCE in groundwater, and a final decision on groundwater restoration will await a final remedial decision for restoring the groundwater site-wide.

That is after OU2 is complete, after we continue to finish this entire investigation, we will figure out what can be done to help the entire aquifer.

The remedial action

objectives, our specific goals are designed to protect human health and the environment. The RAO's for the proposed ROD amendment are:

To minimize and/or eliminate the potential for future human exposure to site contaminants via contact with the contaminated drinking water, and help reduce migration of contaminated groundwater.

The alternatives evaluated in the proposed plan: When the language was sent out in April, GW-1, the first alternative, was continued operation of the existing treatment systems on Village of Garden City wells 13 and 14, and the second alternative to evaluate was the continued operation of existing treatment systems on Village of Garden City wells 13 and 14 and the groundwater extraction and treatment system that is proposed.

The continued operation of

existing treatment systems on VGC wells 13 and 14: Operation and maintenance of treatment systems on Village of Garden City wells 13 and 14; the replacement of existing air strippers as equipment wears out. This includes a vapor-phase carbon treatment of air emissions from air stripper treatment units, if needed. There is a state program that has to be followed to determine whether or not their omissions are safe or not.

Monitoring of contamination in groundwater at the site, including groundwater entering the VGC wells 13 and 14; protectiveness of the remedy to be established; what we are doing to make sure everything is continued okay. Protectiveness of the remedy to be reviewed every five years. That's standard EPA policy.

The estimated present-worth cost of this system of maintaining the treatment on wells 13 and 14 is

$4,039,188.

GW-2 operation of treatment systems on Village of Garden City wells 13 and 14 and the groundwater extraction system has all the same elements as I just described: Separate groundwater extraction and treatment system, and water entering the system in the OU1 portion of the groundwater plume, upgradient of Village of Garden City wells 13 and 14.

The estimated present-worth of the entire system is $13,712,188. So approximately $10 million for the treatment system.

MS. BROWN: Which would be paid by Genesco?

MR. WILLIS: Yes.

MS. BROWN: We hope it will still be paid by Genesco if this original plan goes through.

MR. FISCHER: This proposed plan is not an enforcement document. It does not identify who will be

responsible for the various costs. We would look to the responsible parties to perform the remedy.

MS. BROWN: I thought that you said that was agreed upon.

MR. FISCHER: We filed a settlement agreement. It was filed with the court in 2009 in which Genesco did agree to implement the remedy that we selected in 2007.

MS. BROWN: Which is the 13 million?

MR. FISCHER: It's pretty close, yes.

MR. WILLIS: Common elements of alternatives: Institutional controls that restrict the future use of groundwater at the site. The site management plan is an overall plan on how to do everything we say we are going to do. Investigation of soils at 150 Fulton Avenue; if a change in land-use zoning is proposed that could affect exposure risks; and vapor intrusion

evaluation of structures in the vicinity of 150 Fulton Avenue and response action, if necessary.

When we evaluate criteria, we use a standard nine criteria analysis of alternatives:

Overall protection of human health and the environment.

Compliance with applicable or relevant and appropriate requirements. Those are the standards. Basically, long-term effectiveness and permanence. The reduction of toxicity, mobility or volume through treatment. The short-term effectiveness of implementing the remedy. Implementability; how easy is it to build this. Cost, state acceptance and community acceptance.

Why we are here today -- comparative analysis of alternatives: Overall protection of human health and the environment: Both alternatives are protective.

Groundwater extraction and treatment system is not needed to protect the Village of Garden City water supply.

Compliance with ARARs: Both alternatives will comply with the ARARs. Long-term effectiveness and permanence. Both alternatives will protect Village of Garden City's wells 13 and 14 water supply until a permanent remedy decision is made for the site. After all the site is evaluated.

MS. BROWN: What is ARARs?

MR. FISCHER: ARARs is an acronym for "Applicable or Relevant and Appropriate Requirements" which are the federal and state environmental laws that apply to the clean up.

MR. WILLIS: Reduction of toxicity, mobility or volume through treatment: The Village of Garden City wells 13 and 14 treatment systems provide incidental benefit of treating contamination in the

aquifer. Groundwater extraction and treatment system would treat some additional contamination.

Short-term effectiveness: Construction of groundwater extraction and treatment system would cause short-term impacts to community and workers.

Installing the systems -- implementability, both alternatives are implementable.

The cost is $4,039,188 verses $13,712,188 for the pump and treatment system.

State acceptance: New York State supports EPA's preferred remedy modification. Here, tonight, community acceptance will be assessed following the public comment period.

The reasons for the preferred alternative: It protects the Village of Garden City's wells 13 and 14 public water supply until a final remedy that addresses the

groundwater and the entire area is selected for the site. There are no short-term impacts.

Preferred remedy is more implementable because it does not require the construction of a separate extraction and treatment system.

The preferred remedy is more cost effective than groundwater remedy number 2, which has a present-worth cost of $13.7 million versus the $4 million, and the groundwater restoration is not a purpose of this interim remedy. That's the overall site decision.

The continued operation of Village of Garden City wells 13 and 14 will incidentally continue to help reduce the migration of the OU1 contamination towards the Franklin Square Water District or wells beyond. Village of Garden City wells 13 and 14 treatment systems have an incidental benefit of

removing and treating contaminants in the groundwater.

Next steps: EPA is continuing the OU2 remedial investigation. The remedial investigation is going on right now and has been going on for the last couple of years to, among other things, to define the extent of the OU2 contamination and identify contamination sources for both OU1 and OU2.

OU2 got identified during and after the remedial investigation when we found very high levels of TCE contamination deep in the aquifer, but it wasn't related to a problem we could address. With OU2, like OU1, what we did, we are out there investigating. The contractor has been working on that with me, and we are making headway on what we know about the aquifer system out here.

OU2 focuses on portions of

the groundwater contamination at the site that's primarily contaminated with TCE, and that surrounds and overlaps the OU1 contamination.

Just in this area, with wells 13 and 14, you are primarily getting a piece of contamination, but if you go across the street, the street over well 9, which is behind the firehouse, and that's behind the firehouse on Stuart avenue, the investigation includes the installation of deep monitoring wells in the spring and summer of 2015. We are about to go out and drill some deeper monitoring wells now that they have a better idea on where to put them. They are very expensive.

Any comments or questions?

MR. WILLIS: This PowerPoint presentation is on the website. It's currently on there now. If you want to Google it, you can pull it up.

This (indicating) would be the main line. The railroad tracks in Mineola would be about there.

150 Fulton Avenue, that 7-Eleven right across Nassau Boulevard in Garden City Park would be about there. The OU1 contamination follows a path.

MS. BROWN: It goes under --

MR. WILLIS: It drops to 3 and 400 feet down. While we were doing the investigation up this way we found a couple of parts per million of the trichloroethylene and we can't ignore that. So that's why OU2 began and we're trying to find out, it's a very difficult type of investigation.

When this was done, by the time we got involved we already knew where the source was, where it was migrating to. Here we have it 3 and 400 feet deep over this way and now we are trying to find out where it's coming from to the surface so we can

treat that.

MS. BROWN: Right. Now wells 13 and 14, you are treating the water; what are you treating it with that protects it? The reason I am asking is in 2013, DEC, you guys, the State Health Department, Nassau County Department of Health said in their official Board of Health meeting in 2013 that there's a definite danger of sending contamination to our distribution system with this revised project. Can you address that, please?

MR. WILLIS: I am unfamiliar with that, where was that coming from?

MS. BROWN: This is official memos from the Board of Health, based on a telephone conference call. In other words, you are declining, but you are not eliminating the problem.

MR. FISCHER: If I am thinking about the same minutes that

you are referring to, at that time, what was discussed on the state agency's involvement in those minutes was an investigation, we were looking into whether the pumping of wells 13 and 14 would reduce contamination in the aquifer.

That is not the analysis we are going forward with. The proposal that we are going forward with, the proposal is to ensure that the Village receives cleanup of these wells that, again, if I remember correctly, at the time the issue being discussed was that the Village wells were themselves remediation wells.

MS. BROWN: That was not my understanding, so I don't know.

MR. BADALAMENTI: That is an existing situation that has been there for a long time. That's why the treatment systems are in place. Most treatment systems are very effective in providing a safe

drinking water supply to the Village of Garden City.

MS. BROWN: It's safe but then the 2007, because it's been a while, the 2007 pump and treatment systems had the same contamination, and it was approved, I thought, by the Village as well as by the EPA.

MR. BADALAMENTI: At that point in time it was believed that the contamination levels were increasing and there was a possibility that the treatment systems that the Village had in place were going to be overwhelmed by the contamination.

MS. BROWN: We had to increase the pumping. Did we need to do that according to that green line?

MR. BADALAMENTI: The rate of pumping has to do with the water demand in the community, how much water was required.

MS. BROWN: Why was there a

delay? I mean, if there is a problem with our drinking water, hello, I would like to see it done as best as possible. We are not -- why can't we go to the more expensive plan? I mean, because it's very responsible. I assume from your presentation, what you said here is that it would be getting more of the bad stuff out of the water.

MR. BADALAMENTI: At the time it was required; we thought it would be necessary at that point in time, but the levels have dropped.

MS. BROWN: Where did the contamination go? It doesn't disappear.

MR. BADALAMENTI: If the source gets depleted, then eventually it does.

MS. BROWN: If it's depleted in the source, that means it's moved down into our neck of the woods.

MR. BADALAMENTI: Right now

the object of the interim remedy is to protect the water supply. The existing system does that. As far as OU2, we will try to evaluate alternatives on how to restore the aquifer.

MS. BROWN: How?

MR. BADALAMENTI: There are air strippers in place that remove the bulk of volatile chemicals, in this case, PCE, through an aeration process and it's followed by a polishing step of an activated carbon unit, which in most cases knocks it down to non-detectable levels. It's like an additional step.

MS. BROWN: That's not good enough.

MR. QUINN: Larry Quinn. On the 2007 Record of Decision you said certain wells would be evaluated to determine if the upgrade was "fully protective," then you say the treatment system is "effectively

protective." There is a fundamental difference between "fully protective" and "effectively protective."

In terms of why the different wordage? On your site, on page 6 of the 2007 Record of Decision, it says: "Will be evaluated to determine whether this upgrade is fully protective." Based on the evaluation to date the operating system is "effectively" protecting the water supply. Is there a functional difference between the words "fully protective" and just "effectively protective"?

MR. FISCHER: No.

MS. BROWN: You did say it was declining, you did not say eliminated.

MR. QUINN: The question I had with the slide, with the bottom slide on page 7, you show it fairly right behind the graph that says "below ground surface," the bigger

graph. You have pointed out that green line, that one there. You are remarking that the numbers are declining, but it looks to me that prior to 2012, as you were diagnosing yearly numbers, you have no data for 2012, 2013 and you are saying that in 2015 there was a decline.

I am looking at what happened between 2006 and 2007 where you had a precipitous decline and a huge jump up in the numbers there, back there. Just reflecting back, if we are looking back, 1.5 billion parts and the 3000 billion parts, that's a huge jump; how do we know there wasn't a similar jump, that you did not have a similar jump like we have had in the past, because it looks like we had numbers all around the thousands levels for which you have no data.

MR. WILLIS: It's basically a scale. When you put them all on the

same line here, that's basically what was happening at monitoring well 20 or 21C. Basically, it was minimizing. At the Garden City supply wells 13 and 14 we have the data and it shows a much more even decline, and that's what we were actually -- when you look at it like this, it does look rather sporadic.

MR. QUINN: The present data you are suggesting says there is a decline. That looks just like what happened in 2006, 2007. I have no assurance that there wasn't something similar happening in 2012 and '13. The data points aren't there.

MR. WILLIS: We will address this in the responsiveness summary.

MR. QUINN: The final issue I have on the slide is why EPA proposed to amend the ROD. Continuing the slide you said there was uncertainty as to whether the groundwater extraction will

significantly shorten the time to achieve minimum contamination levels of PCE. It looks like you only did a 30-year analysis for whatever cost purposes and we say we are looking for long-term effectiveness to be permanent in your final solution. Groundwater restoration is not the purpose of this interim remedy.

You have no prediction for beyond 30 years. Why try to program like this when you know that you will have a greater extraction with the more expensive extraction system.

MR. BADALAMENTI: That would be part of the objective of the OU2 investigation, to approach OU2.

MS. BROWN: I thought the OU2 is TCE.

MR. BADALAMENTI: It is TCE and the aquifer.

MR. WILLIS: It's OU1 and OU2 at that point.

MS. BROWN: It could take

longer, not just 30 years; nobody knows.

MR. BADALAMENTI: We are out there investigating right now and looking for solutions.

MR. WILLIS: I hope to have a decision on the OU2 in the near future.

MR. FISCHER: Just to expand: Sal was referring to part of the OU2 investigation to identify other sources of contamination to the aquifer in the OU2 part of the plume. It includes sources of PCE and TCE that are contributing to the contamination, so we need to identify the source as part of the program to investigate what can be done in terms of restoring the aquifer.

MS. BROWN: We certainly know and understand that you want to protect the aquifer. Right now we are talking about Garden City drinking water.

MR. FISCHER: That's the issue, drinking water, to ensure that the drinking water is safe.

MR. BAUER: Jim Bauer, with the Garden City EAB, I have a two-part question:

If you go back to the map, if you could, one of the things that you said or that's in the presentation is that the existing pumping wells 13 and 14 would slow down the migration of the plume to other communities, including Franklin Square. Is there any risk at this point or in the foreseeable future to other wells in other communities? From the map it must be further south.

MR. WILLIS: Most of the PCE contamination we are concerned about migrates down towards Franklin Square. Their wells, as you can see from the water tower, from the golf course, basically they're east, most of the OU1 contamination is being

removed by 13 and 14 so that is what we are saying. It's by that contamination coming out, it's not migrating someplace else. That's all we are saying.

MS. BROWN: It's not completely clean, right? It's still migrating.

MR. WILLIS: There is still a little bit going past it.

MS. BROWN: Including into our drinking water.

MR. WILLIS: What is in the drinking water goes into the treatment system, that contamination is taken out. What we are seeing in monitoring wells down here is that there is still some level of contamination that is getting passed on.

MR. BAUER: The second part of the question: If GW-2 is selected, is there anyway to take the incremental funds, in other words $9 million, and apply that to

OU2 and speed that process up.

MS. BROWN: That would be --

MR. FISCHER: We are performing OU2. We have identified Genesco as one potentially responsible party for OU1. We are prepared to negotiate with them when we talk about implementing the remedy that we ultimately select as part of the amended plan for OU1. We have EPA performing that investigation.

At this point we are looking for sources, looking for responsible parties for that contamination, but at this point EPA is funding that work. It's not that we were selecting the cheaper response for OU1 and requiring Genesco or anybody else to take the difference and apply it towards OU2. We have not identified any potentially responsible parties for OU2 yet.

MR. WILLIS: OU2 is being completed by the EPA.

MR. ELOSTANDO: Don Elostando, E L O S T A N D O. One question, and she is my wife, so I only have one and she has one: Where wells 13 and 14 are, are they in the country club on this map in Garden City?

MR. WILLIS: There is the Garden City Country Club. They are in the Garden City Country Club.

MR. ELOSTANDO: Drinking water from chemicals, does drinking water include water that we wash with?

MR. WILLIS: Yes.

MR. ELOSTANDO: The last one was to Larry's point, the drop- off in the data, did you say there is no explanation for that? You are not really sure whether there's a big drop-off in the middle?

MR. WILLIS: A big drop-off, but that last round of sampling is not completely validated. Before we can use the data, it has to go

through a validation process. They just finished sampling last week.

MR. ELOSTANDO: That was back a couple of years. Larry was saying it was added -- in other words, going across them, there's a big drop, then when Genesco kind of talked to the last drop, was there an explanation for that middle drop off.

MR. WILLIS: No, I don't know.

MS. ELOSTANDO: Pat Elostando. I am a neophyte as far as drinking water systems, so the water that is treated at wells 13 and 14, I assume that water then becomes part of the general pool of water that we drink and that 13 and 14 is not specifically drunk by people that live in the area near 13 and 14; is that true?

MR. WILLIS: It's probably more likely that if you live in the vicinity, you would get more of that

water. It does go into a big pool.

MR. MAKRINO: Steve Makrino, M A K R I N O. Please turn the slide to the ROD water sampling data. The first point there, it says that it's still higher than the federal MCL standard. What is the actual number?

MR. WILLIS: 5 parts per billion is the MCL.

MR. MAKRINO: What is that actually showing?

MR. WILLIS: I don't know offhand.

MR. DE FRANCO: Joe De Franco. As of 2015, recent data for April of this year showed tetrachloroethene concentration at 250 parts per billion, trichloroethylene 48.5.

MS. ELOSTANDO: That's raw water.

MR. DE FRANCO: That's well 13 for the same reporting period, April of 2015. We have 436 parts

per billion PCE and 66.5 parts per billion of TCE. That's water samples; that is prior to treatment which I think is what the question was.

MR. WILLIS: That data is available from the Village.

MR. BADALAMENTI: Your wells are sampled on a monthly basis, those two wells, and that's available either at the Town Village Hall or at libraries.

Are there anymore questions?

MS. BROWN: Does EPA have any idea if the Village is spending $1.5 million more on attorney fees?

MR. FISCHER: We can't respond to the question.

MS. BROWN: Do you have any idea what the litigation is about?

MR. FISCHER: We know what the litigation is about. As to why the Village is spending certain sums of money on the attorneys, that you need to ask the Village.

MR. YUDELSON: David Yudelson from the law firm of Sive, Paget & Riesel, and I am environmental counsel to the Village.

I want to make a statement that would clarify, I think, a little bit of confusion. The cost of treating wells 13 and 14 would be borne by Genesco, not by the Village.

MS. BROWN: Why has 1.5 million been spent on attorneys? They are not health people.

MR. YUDELSON: Somebody has to pursue recovery of these costs. Let's stick to the point of we are in the final throes of the settlement negotiations with Genesco, under which Genesco would be providing the Village with enough funds to operate wells 13 and 14 in the treatment.

MS. BROWN: With the revised plan, not with the original pump and treatment, right? With the $4

million, not with the $13 million.

MR. YUDELSON: Forget those numbers. That's sort of for academic comparison purposes. They don't really have a bearing on what the settlement would be based on.

MS. BROWN: I don't understand. We all want healthy, clean water.

MR. YUDELSON: We are ensuring that there is healthy clean water for all of the people who live in that plume. That's our goal.

MS. BROWN: In other words, it's money, money, money.

It's actually money. What the problem is, Genesco does not want to spend the money.

MR. YUDELSON: I said we are in the final throes of the negotiations in a settlement where they will be paying a sum of money to make sure there is clean water in the Village for a very long time.

MS. BROWN: Excuse me, by

law, the EPA has to get it from Genesco, so why do we have any lawyers involved? By law it already states, does it not, that the responsible party has to pay for the cleanup or whatever, however it's done.

MR. YUDELSON: The Village does not ensure the cost for providing clean water to the public and we are seeking reimbursement of that money. That's part of the settlement as well. If you have a problem with EPA proceeding, it's not to --

MS. BROWN: I don't have a problem with EPA at all. I think they are the good guys. I am just asking why, then, do we have to increase the expense of cleaning our water? Why do we have to pay attorneys now? You just said we have to recover these additional monies, did you not? Why are we incurring costs to recover the money

spent by the Village already? Why don't we go ahead with the 2007 pump and treatment system?

MR. YUDELSON: You would have to ask EPA. The exclusion of the pump and treatment plan would not reduce the Village's expenses, that's the long and short of it.

MS. BROWN: I thought the increased expense was due to the plume, the increased toxicity to the water?

MR. YUDELSON: No. What we are talking about is the Village had to treat its wells so they could supply safe water to the public anywhere. The treatment system proposed in 2007, independent of the Village systems, would not have changed the Village's expenses and that's why we wanted Genesco to reimburse the Village for the past and future cost of treatment, and that is the purpose of this amended plan.

MS. BROWN: We have been treating these wells for how long? 1988 is when your investigation goes back to at 150 Fulton. You did most of OU1, not OU2, but it goes back, therefore, any increased cost to us to ensure that our water is clean and safe for us to drink, would this not also be Genesco's responsibility as the responsible party?

MR. YUDELSON: Genesco did not offer the money prior to the time we initiated the litigation.

MS. BROWN: Why would they offer anything? Didn't it go through the EPA?

MR. YUDELSON: The Village thought they did not agree to pay the cost of the litigation. We came up with a resolution that will make the Village whole and will cover future expenses. That's what I think is a near perfect resolution.

MS. BROWN: This is separate, this $1.5 million is completely

separate.

MR. YUDELSON: Where did that number come from?

MS. BROWN: Garden City News.

MR. YUDELSON: It will be all publicly laid out.

MS. BROWN: This is separate?

MR. YUDELSON: That's correct.

MS. BROWN: At least that's clarified.

MS. AURO: Kathleen Auro, A U R O. On page 13, which is the last slide, the last item on that, it says: "The investigation includes the installation of deep monitoring wells in spring and summer of 2015." Could you tell me where those wells would be located?

MR. WILLIS: Where the new wells are going, at this point we haven't really pinpointed them, but probably north of the site.

MS. AURO: You mean north of 150 Fulton?

MR. WILLIS: Right, northwest of 150 Fulton.

MS. BROWN: In Garden City Park?

MR. WILLIS: That's what we are trying to really figure out, what is going on in the whole area.

MS. AURO: Why would it be north when the plume is coming southeast -- southwest?

MR. WILLIS: I am going to go back to my map here.

MS. AURO: It's coming from another source.

MR. WILLIS: It's very likely coming from another source. All OU2 started with was the TCE contamination very deep in that area. We know that this is traveling along here (indicating). We are trying to figure out what is happening in basically a six square mile area. We went out, we ran tests going up this way of shallow wells. We are trying to do what is

called the "Triad Approach," where we try to do things as cheaply as possible as we are doing the investigation, and this was okay.

We wanted to put in the deep wells here, they are very expensive; but with the shallow wells, we figure, you go out, okay, groundwater is traveling in this direction. We were going to do upgradient, we put in the shallow wells here and saw that there is nothing there. So we go over this way now, on Mineola Boulevard, and there is nothing. We go up Roslyn Road and there is nothing there.

MS. BROWN: Where is it?

MR. WILLIS: We went and put -- we did what we could to find all of the wells that we could find in this whole area. We put in a monitoring device, monitoring the wells all through this area for a month to see if they could start pointing to the way the groundwater

is flowing.

When I got my degree in hydrology many years ago at Adelphi, we had a different idea about how groundwater was flowing through the area. I think we are rethinking how groundwater is flowing now.

So we will put these monitoring devices all through this area. We are learning.

MS. BROWN: You are putting the deep wells south?

MR. WILLIS: We are putting probably the deep wells in this area, up in this area, someplace we haven't, because I am doing all of this and I haven't sat down and really defined where we are going to put these next series of wells. Then, whatever information we get from these wells, we probably will have to put in some more wells. It's a never-ending process. We are learning things and we are not following the plan here that we

thought we had.

I could probably add that at some point in the relatively near future I will come and give an availability session to describe what we come up with. With this, we are trying. We are trying and it's coming through.

When we are putting in wells and sending water to the lab, the lab comes to us and says just, "You're like magic, nobody else can find clean water over here."

MS. BROWN: When do we know the results of the meeting, whether it goes pump and treatment systems, whether it's one and the same?

MR. WILLIS: What goes through here, we have this decline, that's what we did back in 2007.

MR. BADALAMENTI: By September 30th.

MS. BROWN: Do you think by September 25th we would know if it's the 2007 investigation or the 2013

version?

MR. FISCHER: The 30th of September. That is our general turn around.

MR. ELOSTANDO: Or has Genesco or their agents had any inputs or reviewed this before this presentation?

MR. FISCHER: The proposed plan?

MR. BAUER: Yes.

MR. FISCHER: No.

Now I think we mentioned on one of the slides that in 2012 Genesco and the Village made a joint presentation to EPA. In 2012 Genesco and the Village made a presentation to EPA regarding their recommended changes to the 2007 remedy decision. That ultimately formed the basis of what we are proposing today. They have this -- they made the presentation and we needed to evaluate it.

There was a lot of follow-up,

additional information to study. We needed to consult closely with the State of New York, the Department of Health, the County Department of Health. There's a long process; we went through the 2012 presentation to make sure we were comfortable with what we are going public with.

MS. BROWN: And the answer is, in other words, it's basically Genesco?

MR. ELOSTANDO: And that's part of tonight's discussion?

MR. FISCHER: It's based on that.

MR. BAUER: What I just said, EPA verified what was in that plan without any influence or undue influence?

MR. FISCHER: We needed to be comfortable with our plan. We need to be completely comfortable with what we are proposing today.

MR. YUDELSON: Genesco and the Village worked cooperatively,

starting in 2011, because the original proposed plan would have been ineffective in the Village's view. Also, it would be extremely disruptive to the community. It would have placed a treatment facility on a residential lot, which isn't satisfactory. It's running the treatment water up to the bird sanctuary and it would require the routing of pipes and wells under a number of miles of streets in the neighborhood over a period of time. It also would not eliminate the cost of the Village for treatment at wells 13 and 14 and would shorten the time that those wells would be needed to be under treatment.

So we put the best engineers we could find to come up with a plan that would, one, be funded by Genesco; and, two, continue to provide clean water to the Village without any disrepresentation.

MS. BROWN: Don't say it was

ineffective.

MR. YUDELSON: But not in the --

MS. BROWN: Excuse me, a pump and treatment system that is going into Bethpage, that is going all over, don't say that it is ineffective.

MR. YUDELSON: It would be ineffective in shortening the time that 13 and 14 need to be treated or in lowering the cost of treating wells 13 and 14.

MS. BROWN: The bird sanctuary, although you said it was fine to put the systems there.

MR. YUDELSON: People disagree with that, so --

MS. BROWN: From what I understand, that shouldn't be a problem. We are going back to expenses when you talk about miles of piping. I think that's a little exaggeration. Don't say it's ineffective.

MR. YUDELSON: Review the plans.

MS. BROWN: We have been reviewing the pump and treatment systems for a long time.

MR. YUDELSON: It wasn't going to happen.

MS. BROWN: I don't see how you can say that. I really don't see how you are --

MR. YUDELSON: Because I have studied all the engineering reports.

MS. BROWN: I am very happy that you have. I would rather have health professionals.

MR. YUDELSON: The reports were prepared by health professionals.

MS. BROWN: I would rather do what that they say. There is a danger with not going with that.

MS. ECHOLS: Are there any other questions?

MR. STIMMLER: In terms of full disclosure, shouldn't you have

told us about the role of Genesco in all of this tonight? You have said you would talk about the total history package.

MR. FISCHER: I think we did, it's on one of the slides. Genesco made a presentation to EPA, Genesco and the Village made that presentation. The presentation materials are in the administrative record. You can actually see the slide presentation, slide 18.

MS. ECHOLS: You can see the records at two libraries, the Shelter Rock Public Library and the Garden City Public Library. If you want to see any documents related to the site, you can go to one of the libraries or you can come into the EPA office in Manhattan. We have information in the repository there too.

MR. STIMMLER: It says since 2012, they proposed a remedy modification, discussed among the

Village, Genesco and EPA, but that's not what you are saying now. Genesco proposed it. Genesco proposed the remedy.

MR. FISCHER: And the Village.

MR. STIMMLER: Genesco and the Village of Garden City proposed it?

MR. FISCHER: Yes.

MR. STIMMLER: Who, the Village board, as Bob Mangan?

MS. ECHOLS: Anymore questions?

We are going to close the meeting, and Kevin is going to put up a slide that has our contact information. If you have any comments, you can send your comments or questions to Kevin and they will be part of the responsiveness summary.

Do not forget that at the bottom of this slide is the web page for the site. You can Google it and

all of the site-related documents that are attached to this website as well.

Thank you so much for your time.

(Time Noted: 8:30 p.m.)

C E R T I F I C A T E

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

I, MONIQUE CABRERA, a Shorthand (Stenotype) Reporter and Notary Public of the State of New York, do hereby certify that the foregoing Proceedings taken at the time and place aforesaid, are a true and correct transcription of my shorthand notes.

I further certify that I am neither counsel for nor related to any party to said action, nor in any wise interested in the result or outcome thereof.

IN WITNESS WHEREOF, I have hereunto set my hand this 17th day of May, 2015.

_____

Monique Cabrera,
Shorthand Reporter

Attachment 5

Written Comments Submitted During Public Meeting

Questions to be asked at the EPA / Garden City meeting re the Fulton Ave. Garden City Park Superfund Site.

On the May 12th meeting at Village Hall the Environmental Protection Agency (EPA) will address the drinking water contamination currently affecting the Village of Garden City from the Fulton Ave., Garden City Park, Superfund Site. This site includes a. toxic PCE plume currently flowing under Stratford School and Western sections of the Village.

Why has the EPA changed their original recommendations?

Originally, the 2007 agreement was to have Genesco, the responsible party, required by law to pay for the clean-up, remove the contamination and then introduce clean water into the ground Yet, the EPA now states in the May 1st GC News story that this was no longer needed "at this time, in part because contamination levels in this area of groundwater have been declining…" **Declining – but not eliminated.**

In 2013, a revised proposal was made to flood the contaminated site while simultaneously using these same wells to supply water. Yet, the NYSDEC, the USEPA, the New York State Department of Health and the Nassau County Department of Health **unanimously stated in 2013 that there is a definite danger of sending contamination to our distribution system with this revised proposal.**

As Village Trustee Theresa Trouve, chair of Garden City's Environmental Advisory Board, stated in the GC News article "we should be going forward with those wells to keep them as pure as we possibly can."

State Senator

~~As Village Trustee Theresa Trouve, chair of Garden City's Environmental Advisory Board, stated in the GC News article "we should be going forward with those wells to keep them as pure as we possibly can."~~

Kemp Hannon supported a bill **to contain** the Grumman/Navy plume in Bethpage. Why not here in Garden City? Is it not better to have uncontaminated sources of drinking water than to try and decontaminate the source of drinking water before sending it to the community?

Why has Garden City spent $1.5 million in attorneys' fees when Genesco is required by law to pay for the cleanup? Let's move forward now, after eight years of discussions, to ensure clean and safe drinking water to our village.

Cynthia Brown
(b) (6) [redacted]