Record of Decision for the Suspected Fire Training Area (SFTA) Area of Concern at the Former Griffiss Air Force Base Rome, New York

September 1999

Prepared for:

U.S. ARMY ENGINEER DISTRICT, KANSAS CITY
601 East 12th Street
Kansas City, MO 64106-2896

Table of Contents

List of Tables

List of Illustrations

List of Acronyms

AFBCA	Air Force Base Conversion Agency
AFB	Air Force Base
AOC	Area of Concern
ATSDR	Agency for Toxic Substances and Disease Registry
BGS	below ground surface
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CRP	Community Relations Plan
DoD	Department of Defense
EPA	United States Environmental Protection Agency
FFA	Federal Facility Agreement
FS	feasibility study
IRP	Installation Restoration Program
NCP	National Oil and Hazardous Substance Pollution Contingency Plan
NEADS	North East Air Defense Sector
NYANG	New York Air National Guard
NYSDEC	New York State Department of Environmental Conservation
PQL	Practical Quantitation Limit
QAPjP	Quality Assurance Project Plan
RI	remedial investigation
ROD	Record of Decision
SAC	Strategic Air Command
SAP	Sampling and Analysis Plan
SARA	Superfund Amendment and Reauthorization Act
SFTA	Suspected Fire Training Area
SVOC	semivolatile organic compound
TBC	to be considered
USAF	United States Air Force
VOC	volatile organic compound

1 Declaration

1.1 Site Name and Location

The Suspected Fire Training Area (SFTA) AOC is located at the former Griffiss Air Force Base (AFB) in Rome, Oneida County, New York.

1.2 Statement of Basis and Purpose

This Record of Decision (ROD) presents the no further action alternative as the selected remedial action for the SFTA AOC at the former Griffiss AFB. This alternative has been chosen in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendment and Reauthorization Act (SARA), and the National Oil and Hazardous Substance Pollution Contingency Plan (NCP). The Air Force Base Conversion Agency (AFBCA), the United States Environmental Protection Agency (EPA), and the New York State Department of Environmental Conservation (NYSDEC) have adopted this ROD through a joint agreement. This decision is based on the administrative record file for this site.

1.3 Description of Selected Remedy

The selected remedy for the SFTA AOC is no further action.

1.4 Declaration Statement

The AFBCA, EPA, and NYSDEC have determined that no further action is warranted for the SFTA AOC because the baseline risk assessment for recreational, residential, and agricultural land use demonstrates that contaminants in the site soil and groundwater pose no current or future threat to public health or the environment. Future landowners will be notified,

through transfer documents (deed), that the groundwater at the site contained certain contaminants in excess of the New York State drinking water standards

1.5 Signature of Adoption of the Remedy

On the basis of the remedial investigation (RIs) performed at the SFTA AOC and the baseline risk assessment for recreational, residential, and agricultural land use, there is no evidence that the previous operations at this site have resulted in environmental contamination that poses a current or future potential threat to human health or the environment. Future landowners will be notified, through transfer documents (deed), that the groundwater at the site contained certain contaminants in excess of the New York State drinking water standards. The New York State Department of Environmental Conservation has concurred with the selected remedial action presented in this Record of Decision.

Albert F. Lowas, Jr.
Director
Air Force Base Conversion Agency

September 15, 1999
Date

Jeanne M. Fox
Regional Administrator
United States Environmental Protection Agency, Region 2

9/30/99
Date

2 Decision Summary

This section provides an overview of the site-specific factors and analysis that lead to the no further action decision for the SFTA AOC.

2.1 Site Name, Location, and Description

Regional Site Description

The former Griffiss AFB covers approximately 3,552 contiguous acres in the lowlands of the Mohawk River Valley in Rome, Oneida County, New York. Topography within the valley is relatively flat, with elevations on the former Griffiss AFB ranging from 435 to 595 feet above mean sea level. Threemile Creek, Sixmile Creek (both of which drain into the New York State Barge Canal), and several state-designated wetlands are located on the former Griffiss AFB, which is bordered by the Mohawk River on the west. Because of its flat topography, sandy soil, and high average precipitation, the former Griffiss AFB is considered a groundwater recharge zone.

Suspected Fire Training Area of Concern

The SFTA, which is located in the east-central portion of the base (see Figure 2-1), was reportedly used by Griffiss AFB firefighters to simulate aircraft fuel fires and conduct fire training activities; the dates and extent of these activities cannot be confirmed. The area is located on a clearing within reforested land. It currently consists of surficially sandy soils with scattered low-lying vegetation adjacent to a circular gravel-covered drive. Areas north and east of the AOC are wooded, and it is bordered by a fence and Perimeter Road on the west and the former Gate 13 access road on the south (see Figure 2-2).

Surface water runoff from this location is channeled into the base storm drain system, which discharges to Sixmile Creek approximately 800 feet south of the SFTA. Groundwater flow in this area is in a southwesterly direction with a large component to the southeast. During

drilling of the RI soil borings, groundwater was encountered at depths ranging from 6.5 feet below ground surface (BGS) in the northeastern portion of the AOC to 16 feet BGS in the southern portion of the AOC. The soils are silty to fine- and medium-grained sands.

2.2 Site History and Investigation Activities

The Former Griffiss AFB Operational History

The mission of the former Griffiss AFB varied during its operational history. The former Griffiss AFB was activated on February 1, 1942, as the Rome Air Depot, with the mission of storage, maintenance, and shipment of material for the U.S. Army Air Corps. Upon creation of the U.S. Air Force (USAF) in 1947, the depot was renamed Griffiss Air Force Base. The base became an electronics center in 1950 with the transfer of the Watson Laboratory Complex (later Rome Laboratory). The 49th Fighter Interceptor Squadron was also added during that year. In June 1951, the Rome Air Development Center was established with the mission of accomplishing applied research, development, and testing of electronic air-ground systems. The Headquarters of the Ground Electronics Engineering Installations Agency was added in June 1958 to engineer and install ground communications equipment throughout the world. On July 1, 1970, the 416th Bombardment Wing of the Strategic Air Command (SAC) was activated with the mission of maintenance and implementation of both effective air refueling operations and long-range bombardment capability. The former Griffiss AFB was designated for realignment under the Base Realignment and Closure Acts of 1993 and 1995, resulting in deactivation of the 416th Bombardment Wing in September 1995. Rome Laboratory and the North East Air Defense Sector (NEADS) will continue to operate at their current locations. The New York Air National Guard (NYANG) operated the runway for the 10th Mountain Division deployments until October 1998 when they were relocated to Fort Drum and the Defense Finance and Accounting Services established an operating location at the former Griffiss AFB.

Environmental Background

As a result of the various national defense missions carried out at the former Griffiss AFB since 1942, hazardous substances and hazardous wastes were used, stored, or disposed of at various sites on the installation. The defense missions involved the storage, maintenance, and shipping of war material; research and development; and aircraft operations and maintenance, among others.

Numerous studies and investigations under the U.S. Department of Defense (DoD) Installation Restoration Program (IRP) have been carried out to detect, locate, and quantify contamination of areas by these substances and wastes. These studies and investigations included a records search in 1981 involving interviews with base personnel, a field inspection, compilation of an inventory of wastes, evaluation of disposal practices, and an assessment of the potential for site contamination; problem confirmation and quantification studies in 1982 and 1985; soil and groundwater analyses in 1986; a public health assessment in 1988 conducted by the U.S. Public Health Service, Agency for Toxic Substances and Disease Registry (ATSDR); base-specific hydrology investigations in 1989 and 1990; and a groundwater investigation in 1991. ATSDR issued a Public Health Assessment for Griffiss AFB dated October 23, 1995, and an addendum to the assessment report dated September 9, 1996.

Pursuant to Section 105 of CERCLA, the former Griffiss AFB was included on the National Priorities List (NPL) on July 15, 1987. On August 21, 1990, USAF, EPA, and NYSDEC entered into a Federal Facility Agreement (FFA) under Section 120 of CERCLA. Under the terms of the agreement, USAF is required to prepare and submit numerous reports to NYSDEC and EPA for review and comment. These reports include identification of environmental areas of concern (AOCs) on base; a scope of work for an RI; a work plan for the RI, including a sampling and analysis plan (SAP) and a quality assurance project plan (QAPjP); a baseline risk assessment; a community relations plan (CRP); and the RI report. The AFBCA delivered a draft-final RI report covering 31 AOCs to EPA and NYSDEC on December 20, 1996, that incorporated or addressed EPA and NYSDEC comments.

During the RI, a site-specific baseline risk assessment for recreational, residential, and agricultural land use was conducted (using appropriate toxicological and exposure assumptions to evaluate cancer risks and non-cancer health hazards) in order to evaluate the risks posed by detected site contaminants to the reasonable maximally exposed individual. In addition, the RI report compared detected site contaminants to available standards and guidance values using federal and state environmental and public health laws that were identified as potentially applicable or relevant and appropriate requirements (ARARs) at the site. Chemical-specific ARARs are usually health- or risk-based numerical values or methodologies that result in a numerical value when applied to site-specific conditions. Currently, there are no chemical-specific ARARs for soil (other than for PCBs), sediments, or air. Therefore, other non-promulgated federal and state advisories and guidance values, referred to as to-be-considereds (TBCs), or background levels of the contaminants in the absence of TBCs, were considered. No further action is proposed when the levels of contaminants at the site, in comparison to the baseline risk assessment for recreational, residential, and agricultural use and

the applicable standards or guidance values, indicate the site poses no threat to public health or the environment.

Proposed Remedy

Based on the results reported in the draft-final RI, AFBCA has proposed no further action be taken at the SFTA. The no further action proposal was based on the level of contaminants found at the site and a site-specific baseline risk assessment for recreational, residential, and agricultural use.

Summary of Site Activities

Fire training activities at the SFTA were reportedly conducted at the former location of a display aircraft. Approximately 500 gallons of fuel were reportedly placed on the bare ground beneath the aircraft and then ignited. The exact dates of the training activities are unknown, and a review of the historical aerial photographs indicated that the area was undeveloped until 1957. During the early 1970s, training activities were reportedly conducted once a week for approximately 1.5 hours per event. The SFTA was abandoned in 1973 or 1974.

In 1994, an RI was performed to investigate the nature and extent of environmental contamination from historical releases at the AOC in order to determine whether any remedial action is necessary to prevent potential threats to human health and the environment that might arise from exposure to site conditions. During the RI, a soil gas survey was conducted. Soil gas samples were collected at about 4 feet BGS at 12 locations along a 50-foot grid in the SFTA area. No contaminants were detected in these soil gas samples. Four soil borings were drilled at the suspected location of the display aircraft (location information was based on aerial photographs of the aircraft). Surface soil samples were collected from 0 to 0.25 feet BGS or from 0 to 0.5 feet BGS at each soil boring location. Three volatile organic compounds (acetone, methylene chloride, and toluene) and three semivolatile organic compounds (anthracene, benzoic acid, and bis[2-ethylhexyl]phthalate) were detected in some of the surface soil samples; all concentrations were below guidance values. Of the 20 metals detected in surface soil samples, only two exceeded guidance values: cadmium exceeded the guidance value in one sample with a concentration equal to twice the site background concentration, and silver exceeded the guidance value in one sample with a concentration of 1.2 mg/kg versus the background screening concentration of 1.1 mg/kg. Petroleum hydrocarbons were detected in all four surface soil samples at concentrations ranging from 76 to 220 mg/kg.

Subsurface soil samples were collected from the four soil borings at 2-foot intervals to the depth of groundwater in each boring. A total of 19 subsurface soil samples were collected for field screening at an on-site laboratory to determine which samples would be sent for off-site analysis. Nine of the samples (those with the highest concentrations) were then sent for confirmatory analysis at a commercial laboratory.

The on-site field screening detected low levels of several VOCs or SVOCs in subsurface soil from all four of the soil borings; all concentrations were below guidance values. The confirmatory analysis detected VOCs, SVOCs, and petroleum hydrocarbons. Low concentrations (less than 50 µg/kg) of acetone, methylene chloride, and toluene were detected in subsurface soil samples from 0 to 10 feet BGS; all concentrations were below the guidance values. Bis(2-Ethylhexyl)phthalate was detected near or below the detection limit and below the guidance value in subsurface soil. Metals were detected in all of the subsurface soil samples at concentrations less than or equal to the background screening concentrations. Petroleum hydrocarbons were detected in seven of the nine samples at low concentrations, ranging from 8 to 19 mg/kg. Dioxin congeners were detected in one soil boring duplicate sample; the detected concentrations ranged from 0.27 nanograms per kilogram (ng/kg) for 1,2,3,4,7,8-hexachlorodibenzodioxin (HxCDD) to 23.5 ng/kg for 1,2,3,6,7,8,9-octachlorodibenzodioxin (OCDD). The most toxic dioxin, 2,3,7,8-TCDD, was not detected.

One grab groundwater sample was collected from a temporary monitoring well installed at the soil boring to the southwest of the display aircraft location, and one groundwater sample was collected from each of four groundwater monitoring wells installed in 1994 on the southwest side of the SFTA AOC. Three VOCs (1,2,4-trichlorobenzene, freon-113, and naphthalene) and four phthalates (butylbenzylphthalate, di-n-butylphthalate, diethylphthalate, and dimethylphthalate) were detected at estimated concentrations below the detection limit in the grab groundwater sample; none of the concentrations exceeded groundwater standards or guidance values. Twenty-one metals were also detected in the grab groundwater samples, most of them at concentrations exceeding the standards or guidance values. Unfiltered grab groundwater samples, however, frequently yield elevated metals results due to the suspended particulate matter that contains naturally-occurring metals, thus, they are not necessarily representative of groundwater conditions.

Two VOCs (benzene and naphthalene) and three SVOCs (di-n-butylphthalate, diethylphthalate, and bis[2-ethylhexyl]adipate) were detected in some of the samples from the groundwater monitoring wells at low concentrations; none of the sample concentrations exceeded standards or guidance values. Petroleum hydrocarbons and glycols were detected in three of the four groundwater samples at concentrations near the PQL. Fourteen metals were

detected in the groundwater samples. Three metals (aluminum, iron, and manganese) exceeded the standards or guidance values in several samples (see Table 2-1).

As a follow-up to the RI and at the request of the regulators, an inspection of the SFTA monitoring wells was performed in August 1997 during the supplemental investigation. This inspection did not indicate the presence of any free product.

2.3 Highlights of Community Participation

The proposed plan for the SFTA AOC was released to the public on February 18, 1998. The document was made available to the public in both the administrative record and an information repository maintained at the Jervis Public Library. The notice announcing the availability of this document was published in the *Rome Sentinel* on February 18, 1998. In addition, a public meeting was held on March 10, 1998. At this meeting, representatives from AFBCA, EPA, and NYSDEC answered questions about issues at the AOC and the no further action proposal under consideration. A response to the comments received during this period is included in the Responsiveness Summary, which is part of this Record of Decision (see Section 3). This decision document presents the selected remedial action for the SFTA AOC at the former Griffiss AFB, chosen in accordance with CERCLA, as amended by SARA and, to the extent practicable, the NCP. The decision for this AOC is based on the administrative record.

2.4 Scope and Role of Site Response Action

The scope of the no further action response for the SFTA addresses the soils and groundwater at the site. Based on the baseline risk assessment for recreational, residential, and agricultural use, there is no evidence that previous operations at this site have resulted in environmental contamination that poses a current or potential threat to human health or the environment.

2.5 Summary of Site Risks

A baseline risk assessment for recreational, residential, and agricultural use was conducted to evaluate current and future potential risks to human health and the environment associated with contaminants found in soils and groundwater during the RI at the SFTA AOC. The results of the risk assessment were considered when formulating this no further action proposal.

Human Health Risk Assessment

A baseline human health risk assessment was conducted during the RI to determine whether chemicals detected at the SFTA AOC could pose health risks to individuals under current and proposed future land uses. As part of the baseline risk assessment, the following four-step process was used to assess site-related human health risks for a reasonable maximum exposure scenario:

- Hazard Identification–identifies the contaminants of concern at the site based on several factors such as toxicity, frequency of occurrence, and concentration;
- Exposure Assessment–estimates the magnitude of actual and/or potential human exposures, the frequency and duration of these exposures, and the pathway (e.g., ingestion of contaminated soils) 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 (e.g., one-in-a-million excess cancer risk and non-cancer Hazard Index value) assessment of site-related risks.

The current and future land use designations for the SFTA AOC are open space. Persons that would most likely come into contact with the contaminants in the soils include recreational users of the land, and residential and agricultural users of adjacent land and groundwater. In addition, if the site is used for industrial purposes in the future, industrial workers might be exposed to groundwater if it were used as a potable water source or as process water for industrial operations.

For risk assessment purposes, it was assumed that the recreational, residential and agricultural users might be exposed to soil at depths up to 2 feet BGS. The surface soil data set used in the risk assessment included the four surface soil borings (0 to 0.25 foot or 0.5 foot) and the samples collected from 0 to 2 feet BGS in the subsurface soil borings (two of these samples met the criteria for inclusion in the surface soil data set). Therefore, a total of six samples comprised the surface soil data set for the risk assessment.

Chemicals of potential concern were selected for use in the risk assessment based on the analytical results and data quality evaluation. All contaminants detected in the soil and groundwater samples collected at the AOC were considered chemicals of potential concern with

the exception of those considered to be essential human nutrients or those detected in less than 5% of the total samples (unless they were class A carcinogens). Metals were excluded if they were detected at a concentration less than twice the mean background concentration. Petroleum hydrocarbons were not included as a chemical of concern; rather the detected constituents (e.g., benzene, toluene, ethylbenzene) were evaluated.

The chemicals of potential concern for the surface soils that were used in the risk assessment included three VOCs (acetone, methylene chloride, and toluene), four SVOCs (anthracene, benzoic acid, diethylphthalate, and bis[2-ethylhexyl]phthalate), dioxin congeners, and four metals (hexavalent chromium, cadmium, selenium, and silver). The chemicals of potential concern for the groundwater included one VOC (benzene), four SVOCs (di-n-butylphthalate, diethylphthalate, naphthalene, and bis[2 ethylhexyl]phthalate), two metals (aluminum and manganese), and total glycols.

The exposure pathways that were evaluated for recreational users included ingestion of groundwater, inhalation of fugitive dust, and skin contact with surface soil. In addition, recreational users could be exposed to contaminants through eating game such as deer. This exposure pathway was addressed in the basewide risk assessment. The exposure pathways evaluated for residential and agricultural users under future land use scenarios were ingestion of groundwater, inhalation of fugitive dust, skin contact with groundwater, and ingestion of crops irrigated with groundwater. The exposure pathways evaluated for the hypothetical future industrial worker were ingestion of groundwater, skin contact with groundwater, and inhalation of VOCs from groundwater.

Quantitative estimates of carcinogenic and noncarcinogenic risks were calculated for the SFTA AOC as part of a risk characterization. The risk characterization evaluates potential health risks based on estimated exposure intakes and toxicity values. For carcinogens, risks are estimated as the incremental probability of an individual developing cancer over a lifetime as a result of exposure to the potential carcinogen. The risks of the individual chemicals are summed for each pathway to develop a total risk estimate. The range of acceptable risk is 1 in 10,000 (1×10^{-4}) to 1 in 1,000,000 (1×10^{-6}) of an individual developing cancer over a 70-year lifetime from exposure to the contaminant(s) under specific exposure assumptions. A computed risk greater than 1 in 10,000 (1×10^{-4}) is considered unacceptable by EPA.

To assess the overall noncarcinogenic effects posed by more than one contaminant, EPA has developed the Hazard Quotient (HQ) and Hazard Index (HI) The HQ is the ratio of the chronic daily intake of a chemical to the reference dose for the chemical. The reference dose is an estimate (with uncertainty spanning perhaps an order of magnitude or greater) of a daily exposure level for the human population, including sensitive subpopulations, that is likely to be

without an appreciable risk of deleterious effects during a portion of a lifetime. The HQs are summed for all contaminants within an exposure pathway (e.g., ingestion of soils) and pathways to determine the HI. When the HI exceeds 1, there may be concern for potential noncarcinogenic health effects if the contaminants in question are believed to cause a similar toxic effect.

EPA bases its decision to conduct site remediation on the risk to human health and the environment. Cleanup actions may be taken when EPA determines that risk at a site exceeds the cancer risk level of 1 in 10,000 or if the noncarcinogenic HI exceeds a level of 1. Once either of these thresholds have been exceeded, remedial action alternatives are evaluated to reduce the risk levels to within EPA's acceptable risk range of 1 in 10,000 to 1 in 1,000,000 and an HI of 1 or less.

Results of the risk assessment for surface soil at the SFTA AOC indicate that chemicals detected in the soil do not pose a current or potential threat to recreational, residential, or agricultural users. The cumulative carcinogenic risks to these users due to exposure to the chemicals of potential concern were calculated as 3 in 10,000,000 (3×10^{-7}) for recreational adults exposed to surface soil and 2 in 10,000,000 (2×10^{-7}) for residential and agricultural adults exposed to surface soil and groundwater. These results are well below the target level of 1 in 10,000 (1×10^{-4}), indicating that potential adverse carcinogenic health effects to occupational workers are not expected to occur from exposure to chemical concentrations in the soil.

The cumulative carcinogenic risk from exposure to contaminants in groundwater by the hypothetical industrial workers was 1 in 100,000,000 (1×10^{-8}). The greatest pathway contributor to this risk was ingestion of groundwater. This result is well below EPA's target level indicating that potential adverse carcinogenic health effects to future industrial workers are not expected to occur from exposure to chemicals in the groundwater.

The cumulative HIs for recreational activities for adults, adolescents, youths, and children from exposure to surface soils ranged from 0.009 to 0.07. Incidental ingestion of surface soils contributed the greatest noncarcinogenic hazard among the pathways evaluated. The cumulative HIs for residential and agricultural receptors exposed to surface soils and groundwater was 0.4 for adults and adolescents, 0.7 for youths, and 0.9 for children. These results are below the target HI of 1, indicating that potential adverse noncarcinogenic health effects are not expected to occur from exposure to site soils and groundwater.

The cumulative HI for the hypothetical industrial workers exposed to groundwater was 0.1. Ingestion of groundwater contributed the greatest noncarcinogenic hazard among the pathways evaluated. This result is well below the target HI of 1, indicating that potential adverse noncarcinogenic health effects are not expected to occur from exposure to groundwater.

Uncertainties exist in many areas of the human health assessment process. However, use of conservative variables in intake calculations and conservative assumptions throughout the entire risk assessment process results in an assessment that is protective of human health and the environment. Examples of uncertainties associated with the risk assessment for the SFTA include: (1) Chemical samples were collected from the suspected source of contamination rather than through random sampling, which may result in a potential overestimate of risk; (2) The HIs associated with dermal contact with soil could not be quantified for many of the chemicals of potential concern due to the lack of dermal absorption factors necessary for the calculation, which may result in a potential underestimate of the risk; (3) For the inhalation pathway, exposure point concentrations in air were derived using three EPA-approved models, which often leads to a potential overestimation of exposure point concentrations and, consequently, a potential overestimation of risk; and (4) It was assumed that groundwater downgradient from the site would be used as a residential or agricultural water supply in the future. Since groundwater is not currently a source of potable water and there are no residential dwellings adjacent to this AOC, this assumption may result in a potential overestimate of risk.

Ecological Risk Assessment

A risk assessment for ecological receptors at the SFTA was conducted during the RI. Although certain state endangered plants and animals have been observed on or in the vicinity of the base, no threatened or endangered plant or animal species have been identified at this site. Therefore, the ecological risk assessment was performed for terrestrial wildlife (in this case, the short-tailed shrew and the raccoon) through the most likely routes of exposure, which are ingestion of the soil and ingestion of native vegetation. The same chemicals of potential concern that were used for surface soil in the human health risk assessment were used in this ecological risk assessment. The calculated ecological HIs were less than the EPA target level of 1. The highest HIs were calculated for dioxins at 0.6 for the short-tailed shrew and 0.001 for the raccoon. This AOC poses no threat to ecological receptors.

2.6 Description of the No Further Action Alternative

No further action is proposed for the SFTA AOC. The majority of the chemicals detected at the SFTA do not exceed standards and guidance values, and currently there is no known source of these contaminants at the site. In addition, the baseline risk assessment (for recreational, residential, and agricultural use) indicates that the levels of contaminants present in the soils and groundwater are within or below EPA's acceptable carcinogenic risk range for

recreational, residential, or agricultural users. Therefore, the concentrations of chemicals in the soil and groundwater and the baseline risk assessment demonstrate that site contaminants pose no current or potential threat to public health or the environment.

2.7 Significant Changes

The proposed plan for the SFTA was released for public comment on February 18, 1998. The proposed plan identified no further action as the preferred alternative. The agencies have reviewed all written and verbal comments submitted during the public comment period. Upon review of these comments, it was determined that no significant changes to the remedy, as it was originally identified in the proposed plan, were necessary.

Table 2-1

COMPOUNDS EXCEEDING GROUNDWATER STANDARDS AND GUIDANCE VALUES GROUNDWATER SAMPLES

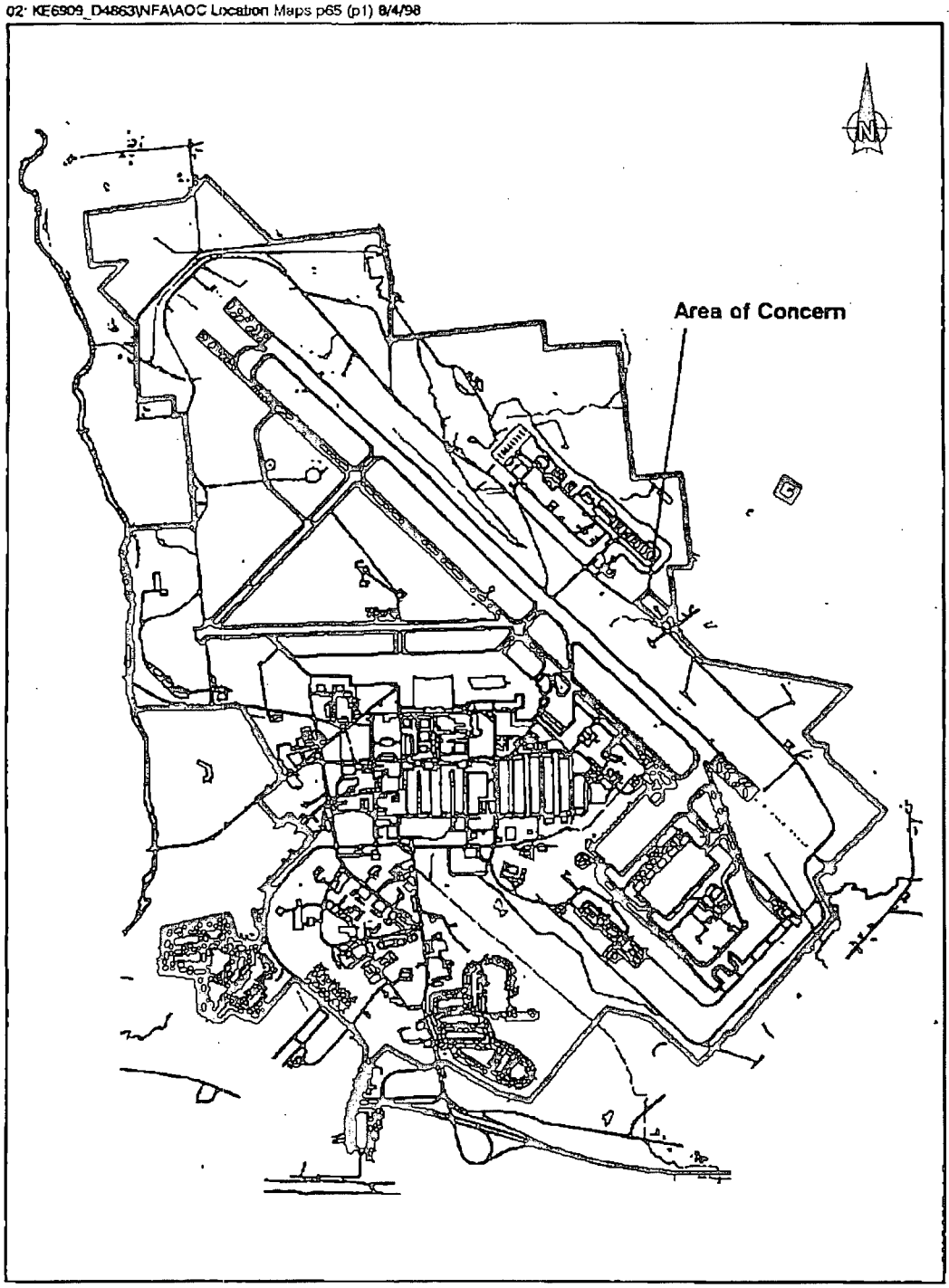
Compound	Range of Detected Concentrations (mg/L)	Frequency of Detection Above Most Stringent Criterion	Most Stringent Criterion (mg/L)
Aluminum	0.51 - 0 97	3/4	0 05[a] (0.43[b])
Iron	0 086J - 1 94	3/4	0 3[c] (0 75[b])
Manganese	0.022 - 0 285	2/4	0.05[a] (0.14[b])

[a] Federal secondary maximum contaminant level
[b] Background screening concentration.
[c] New York primary maximum contaminant level.

Key

J = Estimated concentration

02· KE6909_D4863\NFA\AOC Location Maps p65 (p1) 8/4/98



SOURCE: AFBCA 1996

SCALE
0 4,000 8,000 Feet

Figure 2-1 SUSPECTED FIRE TRAINING AREA AOC FORMER GRIFFISS AIR FORCE BASE

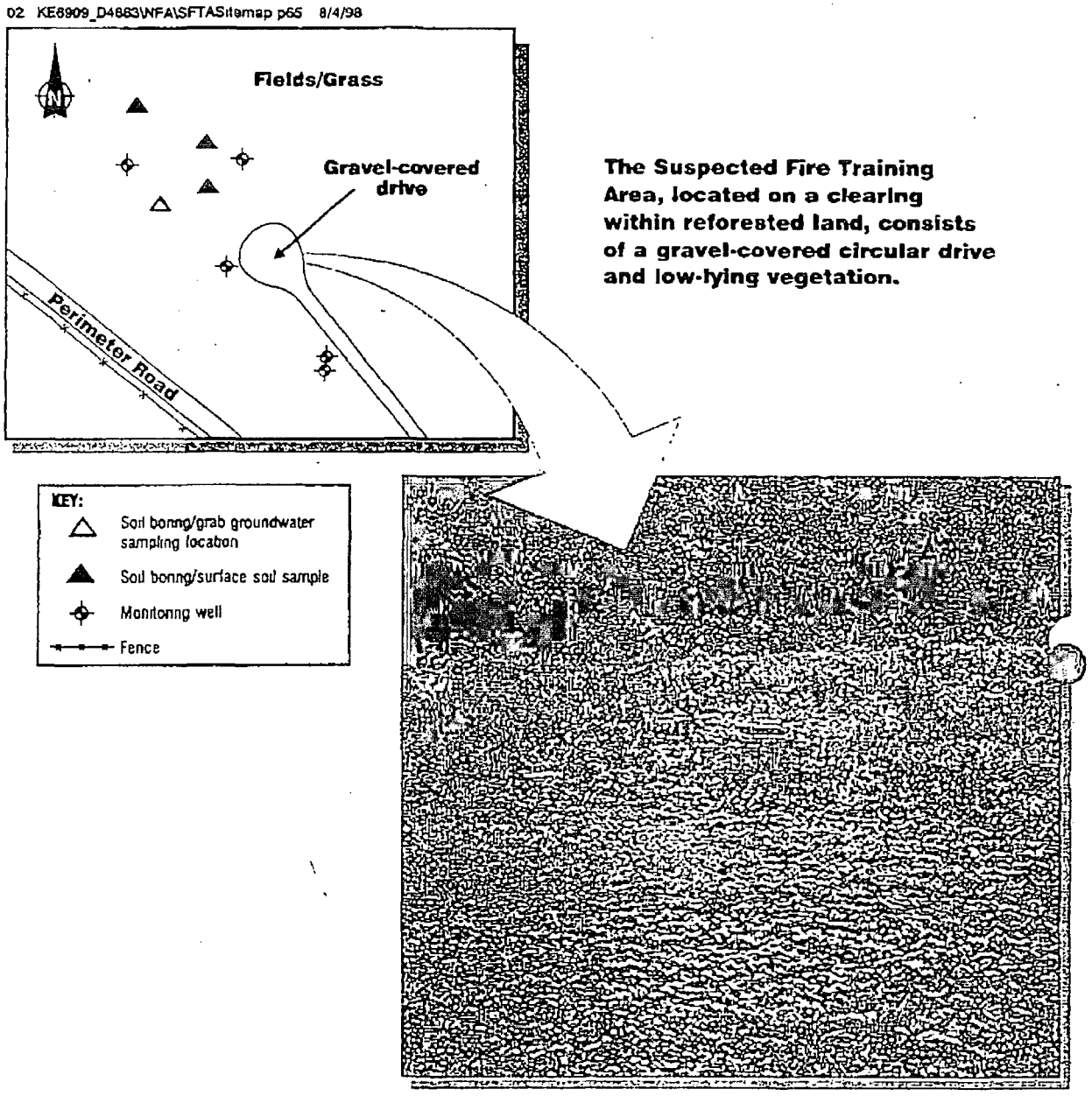


Figure 2-2 SITE MAP OF THE SUSPECTED FIRE TRAINING AREA AOC

3 Responsiveness Summary

On Wednesday February 18, 1998, AFBCA, following consultation with and concurrence of the EPA and NYSDEC, released for public comment the no further action proposed plans at the Building 214, Building 219 Drywell, Building 301 Drywell, T-9 Storage Area, Fire Demonstration Area, and Suspected Fire Training Area Areas of Concern (AOCs) at the former Griffiss Air Force Base. The release of the proposed plans initiated the public comment period, which concluded on March 20, 1998.

During the public comment period, a public meeting was held on Tuesday March 10, 1998, at 5:00 p.m. at the former base chapel located at 525 Kirkland Drive. A court reporter recorded the proceedings of the public meeting. A copy of the transcript and attendance list are included in the Administrative Record. The public comment period and the public meeting were intended to elicit public comment on the proposal to take no further action at these sites.

This document summarizes the verbal comments and provides responses to the comments received at the March 10, 1998, public meeting. No written comments were received during the public comment period, which ran from February 18 through March 20, 1998.

Comment #1

One commentor referred to an article in the Sentinel that indicated that a certain firm involved in computer chips took the Griffiss Park off its list because it is considered a brownfield area. The same commentor also stated, "Last week a state consultant rejected the Griffiss Park's application to be one of the ten potential manufacturing sites around the state. Quoting from the Sentinel article, Dimeo said, 'The fact the park is considered a brownfield because of wastes dumped by the Air Force may have influenced that decision.' I'm wondering if any of these sites are part of that decision, are part of that brownfield?"

Response #1

No. These sites were not selected for consideration as brownfield sites. There is a brownfield site under consideration in Rome, NY; however, such evaluation is independent from the ongoing work at Griffiss.

Comment #2

Two commentors expressed concern that the contaminant levels shown in the tables of the proposed plans are above the stringent regulatory criteria shown in the tables. They requested an answer as to what rationale was used to justify no further action.

Response #2

It is assumed that this comment was directed at the T-9 Storage Area proposed plan since several compounds exceeded guidance values for surface soils at that site. Upon further review, it was decided to temporarily postpone the issuance of a ROD for the T-9 Storage Area until an interim removal action is completed. A revised proposed plan for the T-9 Storage Area will be issued. It will include the results of the confirmatory samples taken after the interim removal action is completed.

For this site, as explained in the Environmental Background section of the proposed plans:

The no further action proposal is based on an evaluation of two investigation criteria. First, a baseline risk assessment for recreational, residential, and agricultural usage, using appropriate toxicological and exposure assumptions, was conducted to evaluate the risks posed by detected site contaminants. Second, the levels of contaminants found were compared to available standards and guidance values for each potential contaminant. The standards and guidance values were determined by using federal and state environmental and public health laws that were identified as potentially applicable or relevant and appropriate requirements (ARARs) at the site. Chemical-specific ARARs are usually health- or risk-based numerical values or methodologies which result in a numerical value when applied to site-specific conditions. Currently, there are no chemical-specific ARARs for soil, sediment, or air other than for PCBs. In addition, groundwater and drinking water standards have not been promulgated for all potential contaminants. Therefore, other nonpromulgated federal and state advisories and guidance values, referred to as "TBCs," or background values of the contaminants in the absence of TBCs, were considered. Environmental sampling results were compared to the most stringent of these standards or guidance values during the remedial investigation for the AOC. No further

action is proposed for this AOC because the baseline risk assessment evidence and the comparison of the levels of contamination to the applicable standards and guidance values indicate that this site poses no significant threat to public health or the environment.