Record of Decision for Soils at the Building 219 Drywell Area of Concern at the Former Griffiss Air Force Base Rome, New York

September 1999

Prepared for:

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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
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 Building 219 Drywell Area of Concern (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 remedial action alternative with land use restricted to industrial land use as the selected remedial action for soils at the Building 219 Drywell 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, to the extent practicable, 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 Building 219 Drywell AOC is no further remedial action, with land use restrictions for industrial land use. The agencies will perform joint five-year reviews to ensure that future land use is in compliance with the transfer documents (deed) and consistent with the baseline risk assessment for industrial land use

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1.4 Declaration Statement

The AFBCA, EPA, and NYSDEC have determined that no further remedial action, with land use restrictions, is warranted for the Building 219 Drywell AOC because the baseline risk assessment for industrial 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 land use is restricted to industrial use.

1.5 Signature of Adoption of the Remedy

On the basis of the remedial investigations (RIs) performed at the Building 219 Drywell AOC and the baseline risk assessment for industrial land use, there is no evidence that previous operations at this site have resulted in environmental contamination that poses a current or future potential threat to human health or the environment if the land is restricted to industrial use. Future landowners will be notified, through transfer documents (deed), that the land use is restricted to industrial use. 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

8/30/99
Date

2 Decision Summary

This section provides an overview of the site-specific factors and analysis that lead to the no further action with land use restrictions decision for soils at the Building 219 Drywell 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.

Building 219 Drywell Area of Concern

Building 219, the Electric Power Production Shop, is located in the west-central portion of the base (see Figure 2-1). Based on interviews with base personnel, a drywell was reportedly located south of Building 219 in what is now an asphalt parking lot (see Figure 2-2). The actual location of the drywell has not been determined. The drywell was reportedly a 4-foot-square by 10-foot-deep pit filled with stone and gravel.

Building 219 is not located near any natural surface water drainage features. Surface water runoff is channeled into the base storm drain system, which discharges to the Mohawk River. Groundwater flow in this area is southwesterly. Groundwater was encountered at a depth

of 14 feet below ground surface (BGS) in a soil boring southwest of the reported drywell location. The uppermost soils (to a depth of 2 feet below the asphalt pavement) have been described as fine to silty medium sand with some fine to coarse gravel. Subsurface soils from 2 feet BGS to 20 feet BGS have been described as brown to yellowish brown, fine- to coarse-grained silty sand with gravel and cobbles

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 by these substances and wastes. These studies and investigations included a records search in 1981, which involved 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 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. 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 industrial land was conducted (using appropriate toxicological and exposure assumptions to evaluate cancer risks and non-cancer health hazards) to evaluate the risks posed by site contaminants to the reasonable maximally exposed individual. In addition, the RI report compares 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 with land use restrictions is proposed when the levels

of contaminants at the site, in comparison to the baseline risk assessment for industrial 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 of the draft RI, AFBCA has proposed that no further remedial action, with land use restrictions for industrial use, be implemented at the Building 219 Drywell AOC. The land use restriction proposal was based on the contaminant levels found at the Building 219 Drywell AOC and the site-specific risk assessment for industrial use. The determination for industrial land use was based on the redevelopment plan for Griffiss AFB provided by the Griffiss Local Development Corporation (GLDC).

Summary of Site Activities

The Building 219 Drywell AOC was reportedly used to dispose of liquid wastes. Fuel spills have also been reported at this site. The drywell operated until the early 1970s, with the disposal of less than 1 gallon per day of neutralized battery acid, less than 1 gallon per day of ethylene glycol, and less than 1 gallon per month of shop floor washwater.

In the RI, the nature and extent of environmental contamination from historical releases at this AOC were investigated to determine whether any remedial action is necessary to prevent potential threats to human health and the environment that might result from exposure to site conditions. In 1993 and 1994, during the RI, a surface geophysical survey was performed, and one test pit was excavated in an attempt to locate the drywell. Neither the drywell nor any discharge points were detected by the survey, and they were not discovered during excavation.

In 1994, one soil boring was drilled in the anticipated downgradient direction from the reported drywell location. Seven soil samples were collected at 2-foot intervals from the surface to the depth of the groundwater; all samples were sent to a commercial laboratory for chemical analysis. Three volatile organic compounds (acetone, toluene, and trichloroethylene) were detected in several subsurface soil samples; all concentrations were below soil guidance values. Seven semivolatile organic compounds were also detected. Six of the SVOCs were polynuclear aromatic hydrocarbons (PAHs) (benzo[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, chrysene, fluoranthene, and pyrene). These SVOCs were detected only in the sample collected from the 0- to-2-foot depth interval, indicating that their presence may be related to asphalt at the site rather than prior disposal activities. The seventh SVOC, bis(2-ethylhexyl)phthalate, was detected in all seven soil samples and may be related to the gloves worn by field personnel or the

plastic containers used to ship deionized water to the site. The concentrations of all of the SVOCs were below soil guidance values with the exception of benzo(a)pyrene (see Table 2-1) Ten pesticides were detected in soil samples collected down to a depth of 12-feet BGS; none of their concentrations exceeded soil guidance values. Twenty-four metals were detected in the subsurface soil samples The concentrations of six metals exceeded soil guidance values (see Table 2-1).

Petroleum hydrocarbons were detected in six of the seven soil samples at concentrations ranging from 7 to 1,600 mg/kg. The highest concentrations were detected in the samples collected at depths less than 8 feet BGS, with the highest concentration occurring in the 0-to-2-foot depth interval. This finding is similar to the detection of PAHs at shallow depths and indicates that the presence of total petroleum hydrocarbons may be related to the asphalt rather than to previous disposal activities

In 1994, one grab groundwater sample was collected from the temporary monitoring well installed in the soil boring and sent to a commercial laboratory for chemical analysis. In 1995, a second grab groundwater sample was collected and analyzed for SVOCs (the laboratory had failed to analyze for SVOCs in the first sample). One VOC (trichloroethylene), three SVOCs (acenaphthylene, anthracene, and di-n-butylphthalate), five pesticides, sixteen metals, total glycols, and petroleum hydrocarbons were detected in the grab groundwater sample. None of the VOCs, SVOCs, or pesticide concentrations exceeded the screening levels. Five of the sixteen metals exceeded the standards or guidance values (aluminum, iron, manganese, sodium, thallium). Unfiltered grab groundwater samples, however, frequently yield elevated metals results due to the suspended particulate matter that contains naturally occurring metals. Therefore, grab groundwater samples are not necessarily representative of groundwater conditions.

The concentration of total glycols (0.44 mg/L) in the grab groundwater sample exceeded the New York State Groundwater Standard of 0.05 mg/L. However, glycols disposed of in the drywell in the 1970s should not be present in the environment in 1995 because glycols do not typically adsorb to either soils or sediments and rapidly biodegrade in groundwater. The physical half-life of glycols in the environment ranges from 4 to 24 days. Therefore, the presence of glycols does not appear to be related to drywell usage, but it was investigated under a separate RI AOC. Petroleum hydrocarbons were detected at a concentration of 0.3 mg/L which slightly exceeds the New York State Groundwater Standard for unspecified organic compounds (0.1 mg/L).

The groundwater is being evaluated for individual sites at the former Griffiss AFB on the basis of location and the direction of groundwater flow. Wells will be considered in groups

according to their location within given groundwater drainage areas and their relationship to individual sites or groups of sites. There are eight groundwater drainage areas on the former base; the Building 219 AOC falls within the Mohawk River drainage basin and will be discussed and evaluated in this context.

2.3 Highlights of Community Participation

A proposed plan for soils at the Building 219 Drywell AOC indicating no further action as the selected remedial action 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).

The agencies have determined the land use restrictions that will be placed on the Building 219 Drywell AOC. This determination is based on the transfer and future reuse of the site indicated in the redevelopment plan for Griffiss AFB, which was provided by the GLDC.

This decision document presents the selected remedial action for the Building 219 Drywell AOC at the former Griffiss AFB, chosen in accordance with CERCLA, as amended by SARA and, to the extent practicable, the NPC. 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 remedial action with land use restrictions response for the Building 219 Drywell AOC addresses the soils at the site. Based on the baseline risk assessment for industrial land use, there is no evidence that the previous operations conducted 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 industrial land use was conducted to evaluate current and future potential risks to human health and the environment associated with contaminants found in

the soils during the RI at the Building 219 Drywell AOC. The results of this assessment were considered when formulating this no further action proposal for soils

Human Health Risk Assessment

A baseline human health risk assessment was conducted during the RI to determine whether chemicals detected at the Building 219 Drywell 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 for assessing 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) assessment of site-related risks.

The 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 samples were considered chemicals of potential concern with the following exceptions. Detected compounds were excluded from the risk assessment if they were essential human nutrients or, for metals, 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 current and future land use designations for the Building 219 Drywell AOC are industrial The buildings adjacent to Building 219, which are also designated industrial, are primarily maintenance shops and offices occupied by base personnel. It is possible that Building 219 and the adjacent structures will be demolished and this area will become an easement next to the newly proposed parkway. In this case, there would be no complete exposure pathways, and exposure to contaminants would likely not occur. However, because of uncertainty regarding the

fate of this area, and for the purposes of the risk assessment, the future land use is assumed to be industrial. Under this scenario, the individuals most likely to be affected by subsurface soil are utility and construction workers. The exposure pathways evaluated for soil include incidental ingestion, dermal contact, and inhalation of fugitive dusts during excavation.

Quantitative estimates of carcinogenic and noncarcinogenic risks were calculated for the Building 219 AOC as part of a risk characterization. The risk characterization evaluates potential health risk 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). 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 at the Building 219 AOC indicate that chemicals detected in the soil do not pose a current or potential threat to utility workers and construction workers. The cumulative carcinogenic risk for utility workers and construction workers were calculated as 2 in 1,000,000 (2×10^{-6}) and 1 in 1,000,000 (1×10^{-6}), respectively, which are within EPA's acceptable target risk range. For chemicals with concentrations greater than the most stringent soil guidance values, the contaminant-specific risk calculations were below the acceptable EPA risk levels. The chemical contributing most to the estimated cancer risks for utility workers and

construction workers was arsenic, which was detected at concentrations ranging from 4 to 10.7 mg/kg; the background screening concentration for arsenic in soils is 4.9 mg/kg.

The target risk level for noncarcinogenic effects, as specified by EPA, is a HI of 1. The total HI for this AOC for subsurface soils was calculated at 0.03 for the utility worker and 0.7 for the construction worker. The greatest potential noncarcinogenic hazard was from the incidental ingestion of soil. These results indicate that adverse noncarcinogenic health effects to these workers are not expected to occur from exposure to chemical concentrations in the soil.

A reference dose and cancer slope factor were not available for lead, and a quantitative risk assessment could not be performed; therefore, a qualitative assessment was performed. The concentrations of lead ranged from 1.5 to 50 mg/kg, with the highest concentration detected in the sample collected from the 0- to-2-foot depth interval. The maximum value slightly exceeds the background screening concentration (36 mg/kg) but is well below the soil guidance value of 400 mg/kg that is recommended by EPA and is based on incidental soil exposure for children. Therefore, lead concentrations in the soil at the Building 219 Drywell AOC are not expected to pose unacceptable risks to utility workers or construction workers.

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 Building 219 Drywell AOC include: (1) In quantifying exposure, it was assumed that chemicals are uniformly distributed over a defined area. At this AOC, every attempt was made to collect chemical samples from the suspected source(s) of contamination. However, because the exact location of the former drywell was never actually identified, it is possible that risk from soils was underestimated; (2) The risk assessment was quantified based on analysis of a relatively small number of soil samples from one soil boring, which can contribute to uncertainty in the risk calculations; (3) When assessing the dermal pathway, it was assumed that workers would come into contact with the soil, although the use of protective clothing is more likely. This assumption would result in potential overestimate of risk; (4) It was assumed that construction under the proposed future use scenario would occur over a one-year period, though it will probably require less time to complete due to the small size of this AOC. This assumption would result in potential overestimate of risk.

The property at the Building 219 Drywell AOC contains levels of contamination suitable for industrial/commercial usage but not necessarily suitable for residential or similar use. The transfer documents will contain the following restrictions to ensure that the reuse of the site is consistent with the risk assessment:

- The property will be industrial use unless permission is obtained from EPA, NYSDEC, and the New York State Department of Health; and

- The owner or occupant of the property shall not extract, utilize, consume, or permit to be extracted any water from the aquifer below the ground surface within the boundary of the property unless such owner or occupant obtains prior written approval from the New York State Department of Health.

Ecological Risk Assessment

A risk assessment for ecological receptors at the Building 219 Drywell was conducted during the RI. The current and one of the proposed future land uses for this AOC is industrial, which, by its very nature, minimizes the number of ecological receptors.

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 through the most likely routes of exposure, which are ingestion of soil and ingestion of native vegetation. The risk assessment was performed for the short-tailed shrew and the raccoon. The ecological HIs were calculated at much less than the target level of 1 for both animal species. The greatest values were 0.00074 for the short-tailed shrew for selenium and 0.00000044 for the raccoon for lead. Therefore, this AOC poses no threat to the terrestrial ecological receptors or the environment.

2.6 Description of the No Further Action With Land Use Restrictions Alternative

No further remedial action, with land use restrictions, is proposed for soils at the Building 219 Drywell AOC. The majority of the chemicals detected do not exceed screening levels, and there is no known source of these contaminants at the site. In addition, the baseline risk assessment for industrial use indicates that the levels of contaminants present in the soils are within or below EPA's acceptable carcinogenic risk range and pose no unacceptable noncarcinogenic risk to the occupational worker. Therefore, both the concentrations of contaminants in the soil and the baseline risk assessment demonstrate that soil contamination at the site poses no current or potential threat to public health or the environment.

2.7 Significant Changes

The proposed plan for soils at the Building 219 Drywell AOC 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 Following the review of these comments, it was determined that the remedy should be amended to clarify no further remedial action, with land use restrictions, at the Building 219 Drywell AOC.

Table 2-1

COMPOUNDS EXCEEDING GUIDANCE VALUES
SUBSURFACE SOIL SAMPLES

Compound	Range of Detected Concentrations	Frequency of Detection Above Most Stringent Criterion	Most Stringent Criterion
SVOCs (µg/L)			
Benzo(a)pyrene	68J	1/7	61[a]
Metals (mg/kg)			
Arsenic	4 - 10.7J	4/7	4.9[b]
Calcium	1,590 - 24,500	1/7	23,800[b]
Total chromium	9.3J - 28.9	2/7	22.6[b]
Copper	8.1 - 43.9	1/7	43[b]
Lead	1.5J - 50	1/7	36.2[b]
Manganese	283 - 2,360	1/7	2,110[b]

[a] NYS soil cleanup objective
[b] Background screening concentration

Key:

J = Estimated Concentration.

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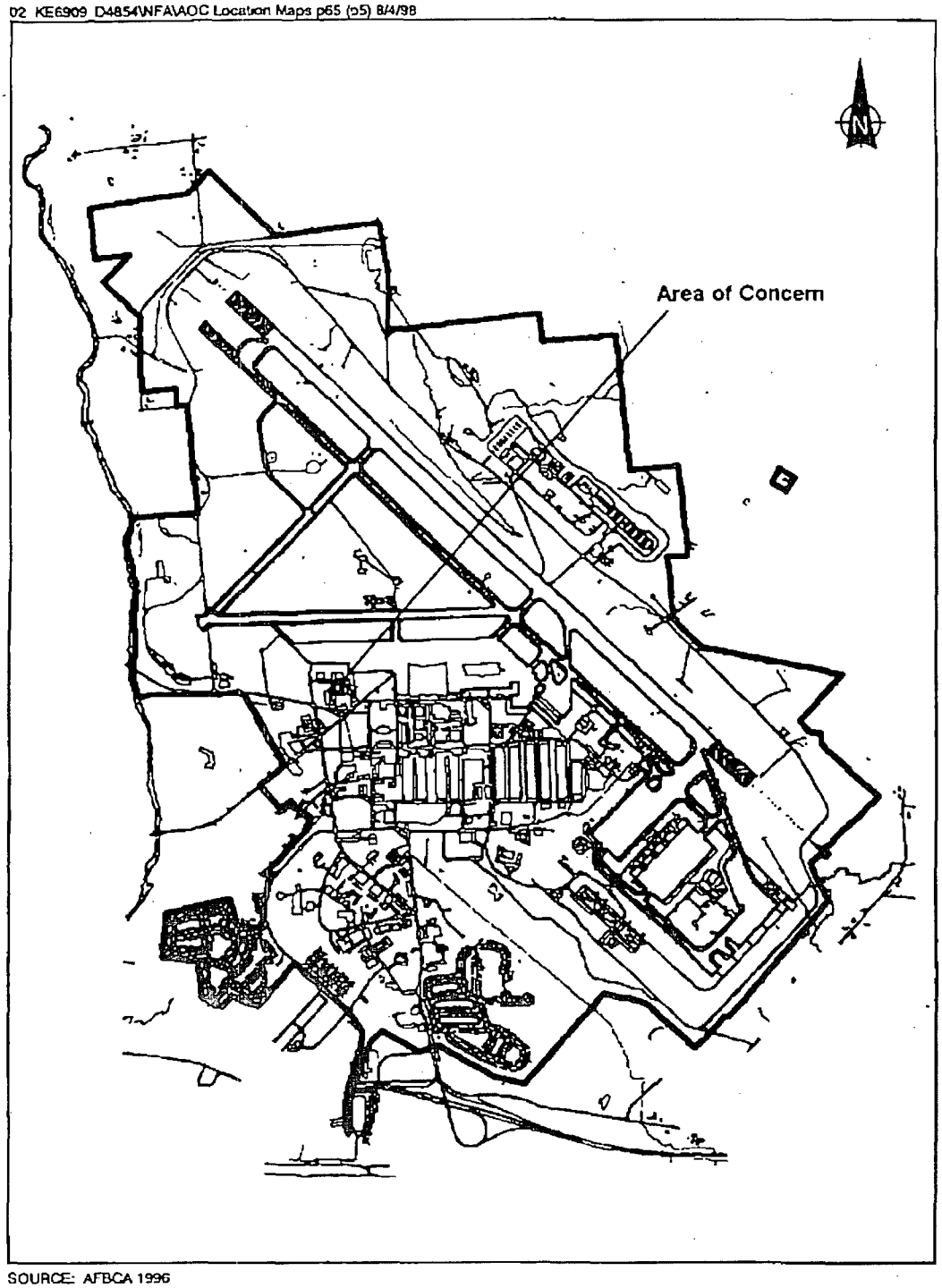

SOURCE: AFBCA 1996

SCALE
0 4,000 8,000 Feet

Figure 2-1 BUILDING 219 DRYWELL AOC FORMER GRIFFISS AIR FORCE BASE

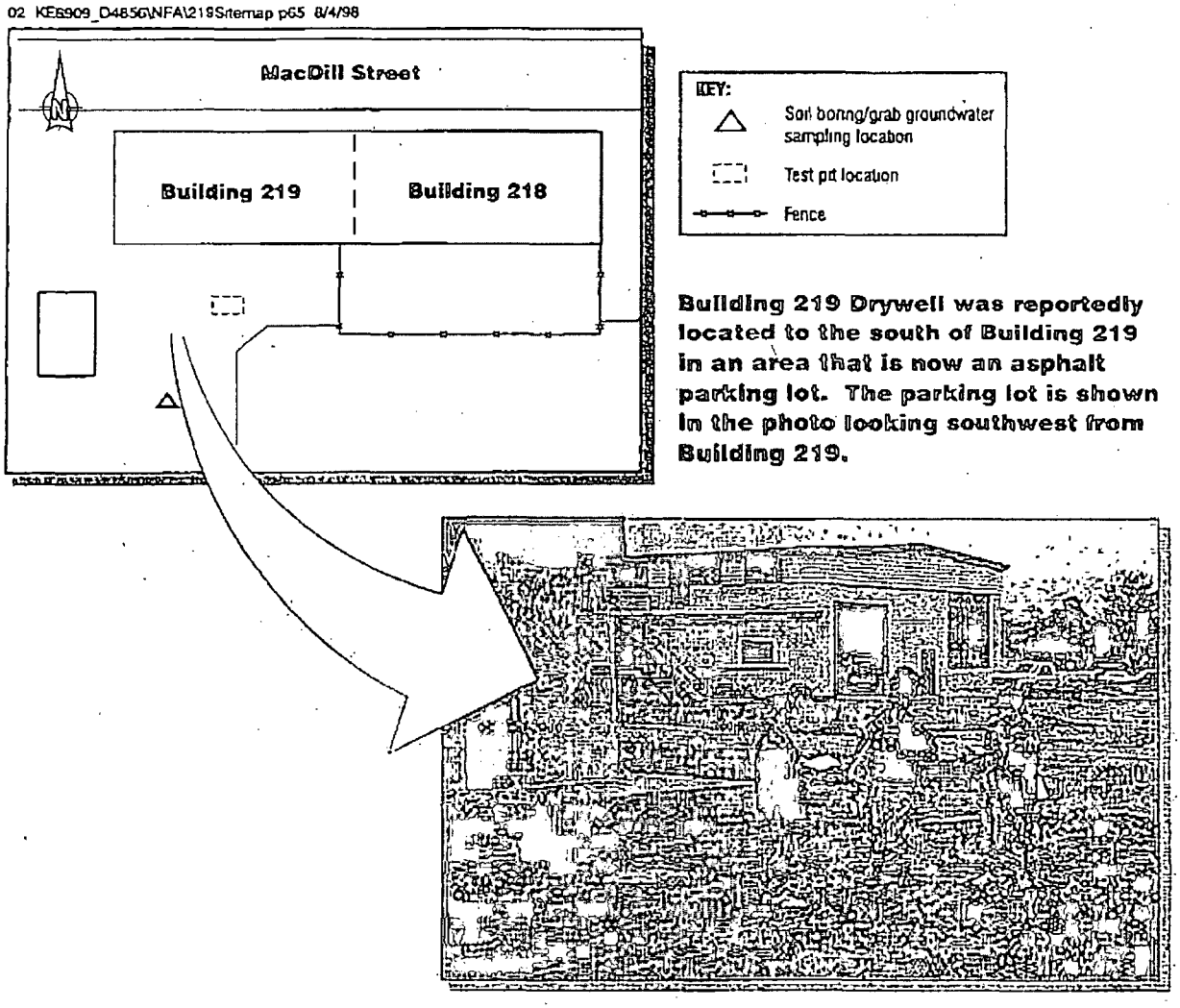

Figure 2-2 SITE MAP OF THE BUILDING 219 DRYWELL AOC

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 site-specific baseline risk assessment for industrial land use, 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 (e.g., industrial reuse) 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. 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.

Although no further remedial action is proposed for this AOC, land use restrictions are required because the baseline risk assessment was limited to industrial/nonresidential reuse. However, the comparison of the levels of contamination to the applicable standards and guidance values (e.g., industrial reuse) indicate that this site poses no significant threat to public health or the environment if use is restricted.