DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name:

Fort Drum Military Reservation

Facility Address:

85 First Street West Fort Drum, New York 13602

Facility EPA ID #:

NY0214020281

| 1. | Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination? | | |
|--------|---|---|--|
| | 7. <u>2.</u> | X | If yes - check here and continue with #2 below. |
| | _ | | If no - re-evaluate existing data, or |
| 23 | - | | if data are not available, skip to #8 and enter"IN" (more information needed) status code. |
| DACITA | CDOING | | |

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

| 2. | Is groundwater known or reasonably suspected to be " contaminated " above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility | | |
|----|---|---|--|
| | _X_ | If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation. | |
| | | If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated." | |
| | | If unknown - skip to #8 and enter "IN" status code. | |

Rationale and Reference(s): Fort Drum is located in the northern portion of New York State approximately 16 kilometers (km) northeast of Watertown (Figures 1 & 2). Fort Drum is roughly rectangular in shape measuring 10 km in width and 32 km in length or 107,265 acres. Ft. Drum is the largest Army installation in the Northeast.

Ft. Drum has been used as a military training site since 1908 and is home to the 10th Mountain Division. Annually almost 50,000 soldiers participate in training at the base.

The facility contains a variety of waste sites and areas of concern including: 9 landfills; 7 underground storage tank sites; 4 storage areas; 4 spill sites; and 3 explosive ordnance disposal areas. Beginning in 1980, Ft. Drum has conducted investigations and implemented interim corrective actions to evaluate and mitigate releases to the environment.

Groundwater investigations at Ft. Drum have indicated the presence of contamination at levels above NYS standards. The nature of the contamination is related to past underground storage of fuels (leaded and unleaded gasoline, diesel and JP-4 along Gasoline Alley; Unleaded gasoline with MTBE at Building P-2140). Separate phase product (LNAPL) has been measured at several areas along Gasoline Alley and Building P-2140 at various thickness. Please see the attached figures (FtDrum001.pdf through FtDrum006.pdf) which illustrate the magnitude and extent of the contamination.

Footnotes:

2.

"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

Has the migration of contaminated groundwater stabilized (such that contaminated groundwater is

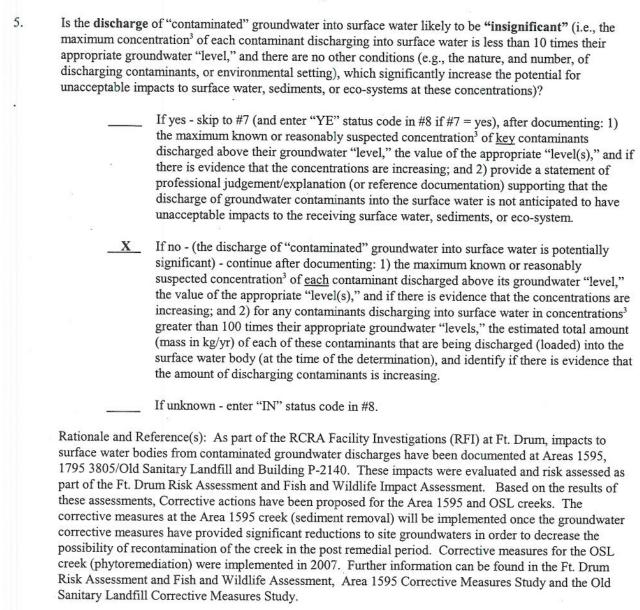
3.

| expected to remain within "existing area of contaminated groundwater" as defined by the monitoring locations designated at the time of this determination)? |
|---|
| X If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination" ²). |
| If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination" ²) - skip to #8 and enter "NO" status code, after providing an explanation. |
| If unknown - skip to #8 and enter "IN" status code. |
| Rationale and Reference(s): At Areas 1595, 1795 and 3805 the contamination plume has reached the area of groundwater discharge to surface water and has therefore reached its maximum extent. At area 1295, 1395 & 1495 the rate of migration at the leading edge of the plume is mitigated by natural attenuation processes (dilution, dispersion and biodegradation). At Building P-2140, the leading edge of the plume has either reached equilibrium with natural attenuation processes or is discharging to surface water. Groundwater monitoring data over the past seven years supports this determination. In addition, groundwater remedial systems have been installed and are in operation at Area 1295 (Soil |
| removal and In-situ Oxidation - 2000, In-situ oxidation 2007); Areas 1395 & 1495 (Aquifer air sparging/bioventing - 1997); Area 1595 (Groundwater extraction - 1992 Aquifer air sparging/Soil vapor extraction - 2005); Area 1795 (Groundwater extraction - 1996, Aquifer air sparging/Soil vapor extraction - 2007), Area 3805 (Groundwater extraction - 1995, Aquifer air sparging/Soil vapor extraction - 2003); Building P-2140 |
| (Groundwater extraction - 1997, Aquifer air sparging/Soil vapor extraction - 2003); Building P-2140 |

² "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

| 4. | Does "contaminated" groundwater discharge into surface water bodies? | |
|----|--|---|
| | X | If yes - continue after identifying potentially affected surface water bodies. |
| | | If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies. |
| | | If unknown - skip to #8 and enter "IN" status code. |

Rationale and Reference(s): Four (4) of the groundwater contamination plumes have documented discharges to surface water bodies. The Area 1595 plume discharges to the Area 1595 creek. The Area 1795 plume discharges to the OSL(Old Sanitary Landfill Creek and its unnamed tributary. The Building P-2140 plume discharges to a wetland near the southern portion of the Military Reservation. Additional information on the affected surface water bodies is contained in the Comprehensive Contaminant Assessment Report (CCAR) and the Building P-2140 Remedial Investigation report.



³ As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

6. Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented⁴)?

If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment,5 appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interimassessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination. If no - (the discharge of "contaminated" groundwater can not be shown to be "currently acceptable") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

If unknown - skip to 8 and enter "IN" status code.

Rationale and Reference(s): Discharge of contaminated groundwater has been documented at Areas 1595, 1795, 3805/Old Sanitary Landfill and Building P-2140. The contaminants of concern at all of the areas are petroleum related or iron (associated with subsurface natural attenuation of the contamination). The groundwater discharges were assessed as part of the risk assessment (RA) and Fish and Wildlife Assessment. The RA concluded that the discharges to the 1795 creek and wetland at Building P-2140 do not pose an unacceptable risk. In addition, the discharges at these areas have been reduced by the implementation of corrective measures. The RA concluded that the discharges at Area 1595 and 3805/OSL require further action. Corrective measures have been implemented at these areas to address the discharges.

- ⁴ Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.
- ⁵ The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

| 7. | Will groundwater monitoring / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?" | | |
|----|--|---|--|
| | _X_ | If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination." | |
| | - | If no - enter "NO" status code in #8. | |
| | + <u></u> | If unknown - enter "IN" status code in #8. | |

Rationale and Reference(s): As part of the Final Corrective Measures for the Fort Drum Military Reservation, remedial systems have been installed and are in operation to address groundwater contamination. Performance monitoring programs in place have indicated that the extent of the groundwater plumes have stabilized and groundwater migration is under control. In addition, concentrations of contaminants in groundwater and surface water have decreased in response to the implemented remedial actions.

Details on the remedial systems can be found in the following documents:

Area 1595 Corrective Measures Implementation report

Area 1795 Corrective Measures Design report

Areas 1895/1995/3805/Old Sanitary Landfill Corrective measures report

Old Sanitary Landfill Phytoremediation design report

AAFES Station (Building P-2140) Corrective Measures Final Design Report.

Site-wide Monitoring Program Report

7.

| 8. | Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility). | | | | | |
|----|---|---|--------------------------|--|--|--|
| | X_ | XYE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Ft. Drum Military Reservation facility, EPA ID #NY0214020281, located at Fort Drum, New York 13602. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility. | | | | |
| | | NO - Unacceptable migration of contaminated groundwater is observed or expected. | | | | |
| | | IN - More information is needed to make a determ | nination. | | | |
| | | | | | | |
| | Completed by | Kent D. Johnson Engineering Geologist | Date: September 24, 2007 | | | |
| | Supervisor | Denise Radtke Section Chief | Date: September 25, 2007 | | | |
| | Director | Robert J. Phaneuf Acting Bureau Director | Date: September 25, 2007 | | | |
| | | Acting Bureau Director | | | | |
| | Locations where | References may be found: | | | | |
| | Division 625 Bro | ork State Department of Environmental Conservation in of Solid and Hazardous Materials badway NY 1233-7258 | | | | |
| | | | | | | |
| | Contact telephone and e-mail numbers | | | | | |
| | (name) (phone (e-mail) | | | | | |

kdjohnso @ gw.dec.state.ny.us

