

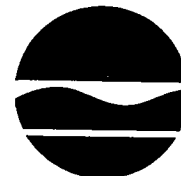
New York State Department of Environmental Conservation

Division of Solid and Hazardous Materials

Bureau of Hazardous Waste Facilities, Room 460

50 Wolf Road, Albany, New York 12233-7252

Phone: (518) 457-9236 FAX: (518) 457-9240



John P. Cahill
Commissioner

October 26, 1998

Mr. Raymond L. Pilon
Project Manager
U.S. Army Corps of Engineers
Buffalo District
1776 Niagara Street
Buffalo, New York 14207-3199

Dear Mr. Pilon:

Re: Lake Ontario Ordnance Works, Component 2 - Phase 1 Interim Removal Action

On October 15, 1998, I visited the property owned by the Somerset Group, located in Model City, New York, which is the subject of interim removal action (IRA) administered by the U.S. Army Corps of Engineers (USACE). This property was formerly part of the Lake Ontario Ordnance Works and Air Force Plant 68. The purpose of my visit was to view progress on the IRA.

During the visit, several problems with the remedial activities were noted. They are as follows:

1. Pieces of potential asbestos containing materials (PACM) (pipe insulation, broken transite panel) were noted in areas which have been excavated (Photo # 1). Additional measures need to be taken to clean up areas which remain to be visually contaminated after excavation.
2. The depth of soil excavation is not a uniform 6 inches as called for in the specifications. Actual excavation depths ranged from <1" to 6". In order to assure that soils have been removed in accordance with the specified depths, the areas should be surveyed before and after excavation activities.
3. PACM was noted in areas beyond the proposed limits of excavation (south fence line) (Photo #2). The area of excavation should be expanded to the fence line, to address the impacted areas.

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4. A debris pile, west of Building 30A (depicted on Plate 4 of the 100% Design Report and Photo #3) containing ACM pipe insulation needs to be addressed. This area must be adequately addressed.
5. Debris piles within Areas 3 & 5, need to be fully removed. This is listed as the part of the preferred action on Page 2-10 of the Final Design Analysis Report. Areas of mounded debris need to be excavated a minimum of 6" below the original grade.
6. Friable ACM was noted in soils scheduled to be excavated (Photos #3 & 4). The presence of friable ACM exposed to the elements increases the need for wetting down of areas prior to and during excavation. Additional measures may also be required for the abatement of degraded asbestos thermal insulation present on jacketed pipes within the excavation areas.
7. Equipment leaving remedial areas are tracking potential contaminated materials out of the areas. Section 02080, Part 3.2 of the Final Design specifications requires the protection of adjacent areas. The practice of allowing vehicles to leave contaminated areas without decontamination is not acceptable.
8. No vehicle decontamination area was in place. Decontamination of personal and equipment leaving areas subject to asbestos abatement is required as part of the Asbestos Hazard Abatement Plan and Industrial Code Rule 56.
9. The interior of Building 30A needs to be pressure washed and floor drain needs to be cleaned out.
10. Site roadways are covered with materials tracked out of excavated areas and need to be cleaned.
11. Drainage swale south of Building 30A, which was excavated, needs to have a proper grade reestablished to assure proper drainage. No sedimentation controls were in place at excavated areas.
12. A final inspection and documentation of excavated areas to ensure the attainment of remedial goals needs to be performed prior to backfilling with clean fill.
13. Building 21-01 (Photo #6), groundwater monitoring wells north of Area 18N and a fire hydrant west of Area 18 N (Excavation Area E) have been damaged by heavy equipment. Property damages caused by USACE contractors must be properly repaired.

Many of the above concerns are a result of not following standard practices for civil and environmental engineering projects. The USACE must perform better oversight of its contractors to assure work is being performed in accordance with the specifications of the Interim Removal Actions (IRA). Failure to achieve the remedial goals of the IRA will result in additional efforts and costs to the Federal Government.

Please respond, in writing, within fifteen (15) days with a plan to resolve Department concerns with the on-going remedial program.

Sincerely,



Kent D. Johnson
Engineering Geologist II

Enclosure

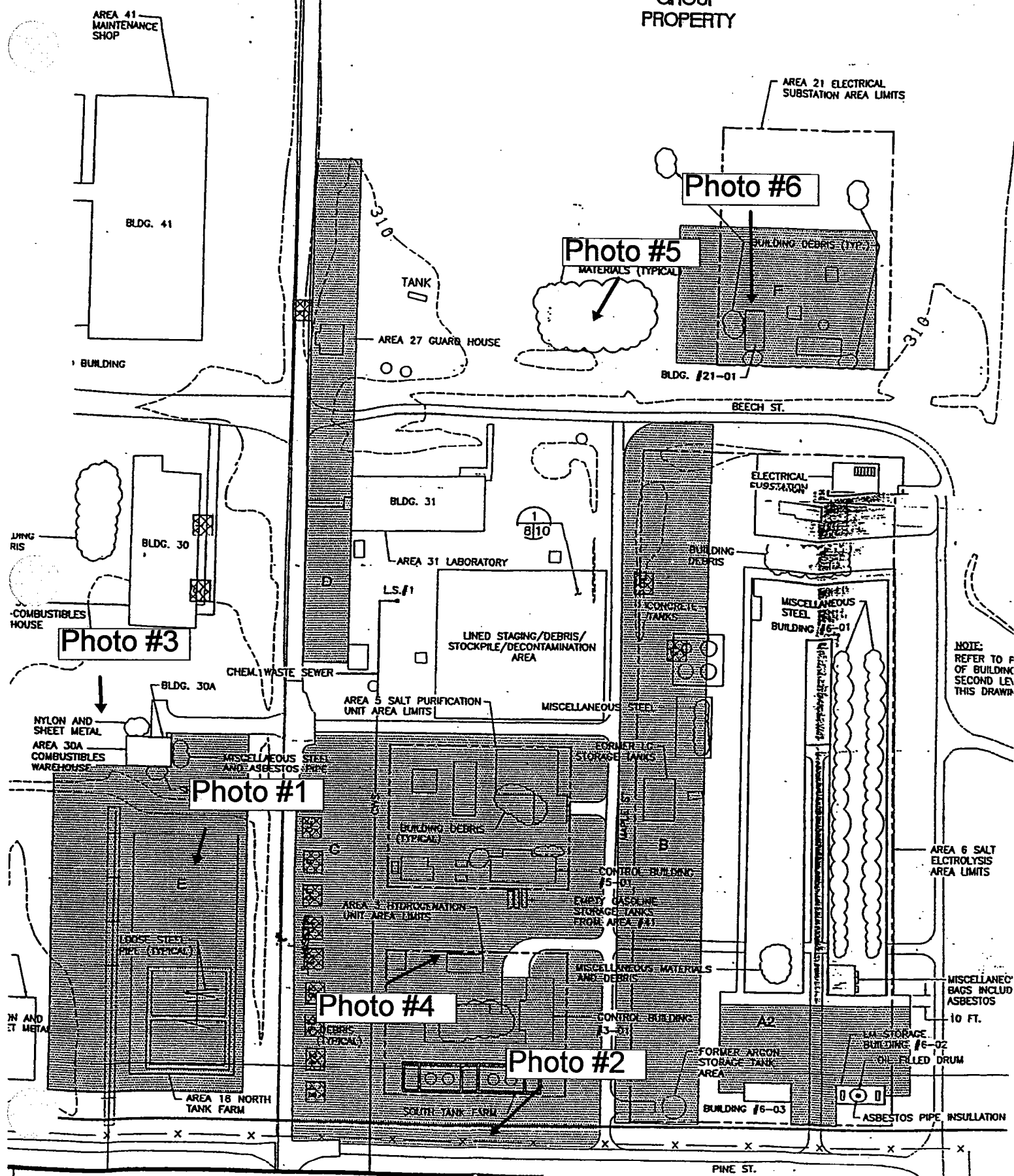
cc: C. Anuszewski, USACE-Baltimore District
J. Syms, Somerset Group
R. Park-Zayatz, CWM
T. Sharp, Town of Lewiston
T. Beachy, Town of Porter
T. Lehmann, NYSDOL-Buffalo
J. Strickland, DEC Region 9
C. Stein, USEPA Region II

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Photograph Locations

SOMERSET GROUP PRI
LIMITS (APPROXIMATE
LOCATION)

**SOMERSET
GROUP
PROPERTY**



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Photo #1

Asbestos containing material within excavated area E



Photo #2

**Asbestos Containing Material adjacent to south property fence
(Outside proposed excavation limits)**

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Photo #3

Debris Pile of West of Building 30A containing ACM

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Photo # 4

Friable ACM with in Area 3



Photo #5

Friable ACM in side pipe jacketing, Area North of Beech Street

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Photo # 6

Damage from construction equipment, Building 21-01

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