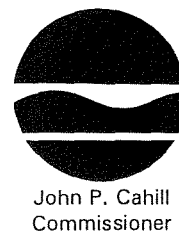


New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials
Bureau of Hazardous Waste Facilities, Room 460
50 Wolf Road, Albany, New York 12233-7252
Phone: (518) 457-9236 FAX: (518) 457-9240



September 18, 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 September 10 & 11, 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). The purpose of my visit was to view progress on the IRA.

During the visit, it was brought to my attention that potential asbestos containing materials (PACM) are located outside of the areas scheduled for remediation as part of the IRA. To assist in my understanding of this issue, I toured the areas in question with representatives of the USACE, its contractors and the site owner. Photographs were taken of PACM to assist in making a determination of the need for additional characterization and/or remedial action. The following summarize the Department's findings:

Areas East of Building 6-01: This area is delineated by a roadway on the west and the property fenceline on the east of building 6-01 (Figure 1). Based on the Asbestos Survey Report (Acres International, June 1998) this area has not been designated for remediation. However, review of the sample information contained in Appendix B of the report indicate that the applicable sample locations (S-095 through S-100) are "Along N/S line running through E wing of bldg 6-01". In addition the sample locations for the survey are non-biased based on a 100-ft grid. During the walkover of this area numerous pieces of aluminum pipe jacketing were noted (Photos #1 & #2). This jacketing covered pipe insulation containing asbestos. White, discolored soil was noted underneath the jacketing (Photo #3). Several stacks of asbestos containing transite panels, whose removal is part of IRA Phase I, are located within this area (Photo #4). Some broken pieces of transite panels were also noted within this area. Finally there is a debris pile in the far southern portion of this area. Pipe jacketing and pieces of transite panels were noticed in the pile.

Area North of Beech Street: This area is bounded by Beech Street on the south, Area 21-former electrical substation on the east and the Area 27 guard house on the west (Figure 2). Based on the Asbestos Survey Report this area has not been designated for remediation. During the walkover, several stacks of asbestos containing transite panels were noted within this area (Photo #5). In addition, numerous pieces of jacketed pipe were also noted. PACM pipe insulation was noted underneath the jacketing (Photo #6). Broken pieces of transite panels were also noted within this area.

200.1e
C02NY002504_02.01_0975_a

9/29
7 Bog/Loire
D. Binger

Please provide
me input
re. SOW for MOC
Thanks.

It is the understanding of the Department that all asbestos containing materials, as defined in 12 NYCRR Part 56, will be addressed as part of this removal action.

Although the Asbestos Survey Report serves as a tool to provide the data necessary to quantify and qualify ACMs at the site, so that an accurate estimate of the proposed asbestos removal effort can be made, the non-biased methodology for the collection of soil samples is not sufficient when the contamination occurs at discrete locations as noted above. Therefore, the USACE must, at a minimum, remove all transite panels and pipe insulation remaining on dismantled piping found on the site. Also representative samples must be collected of soil beneath and adjacent to PACM found in the above described areas.

In addition, it is the position of the Department that ACM on the portions of the former Air Force Plant -68 currently owned by CWM Chemical Services (CWM) must also be addressed. Extensive contamination of this property by ACM related to the use of this property by the Federal Government has been documented (Photos #7 & #8). Although ACMs are not covered by the Defense Environmental Restoration Program, the USACE has received an exception for the removal of ACMs from the Somerset Group property. ACMs on the CWM property are from the same origin and should be eligible for the same exception.

If you have any questions on this issue please contact me at (518) 457-9253.

Sincerely,



Kent D. Johnson
Engineering Geologist II

cc: J. Wesley, 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

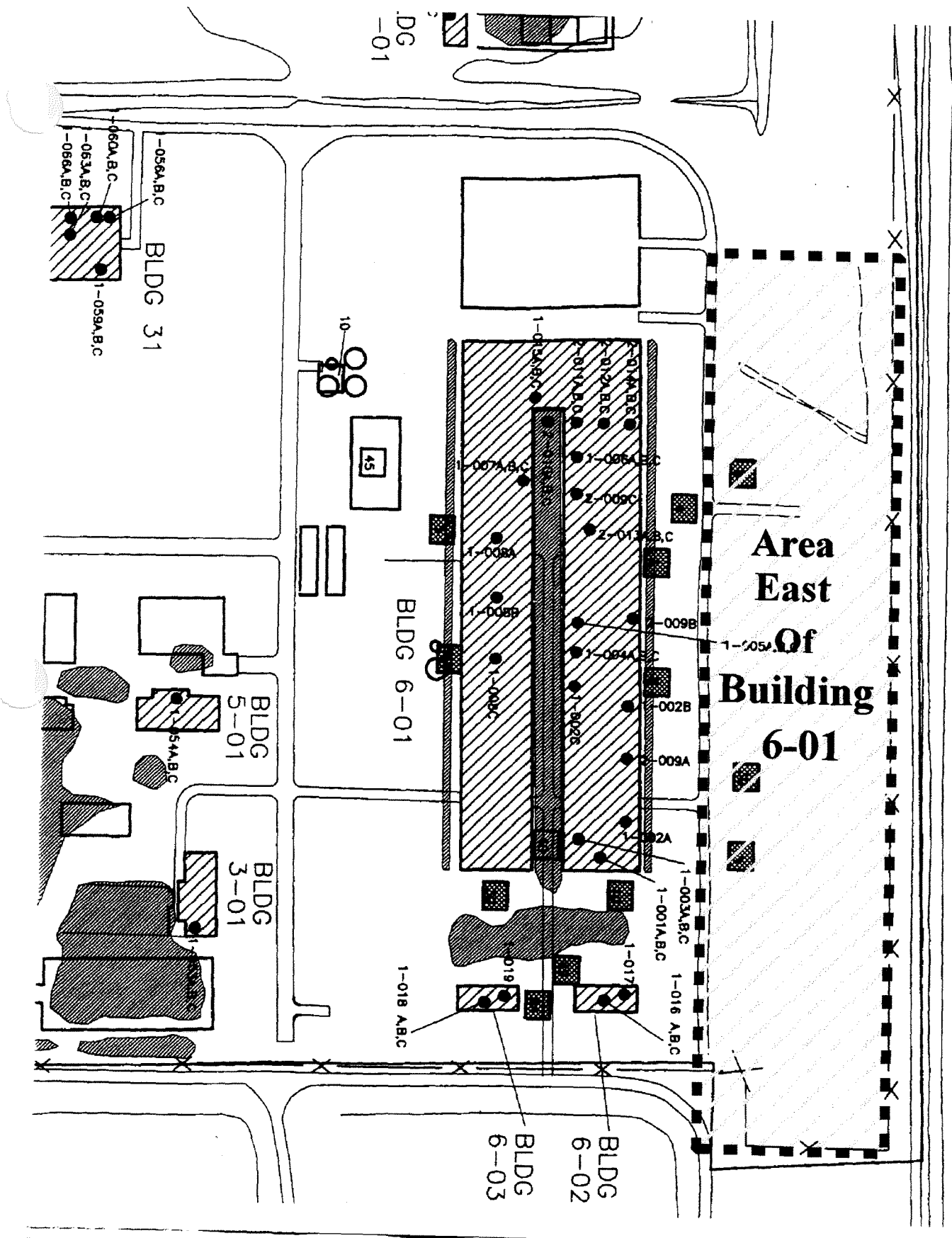


Figure 1

**SOMERSET
GROUP
PROPERTY**

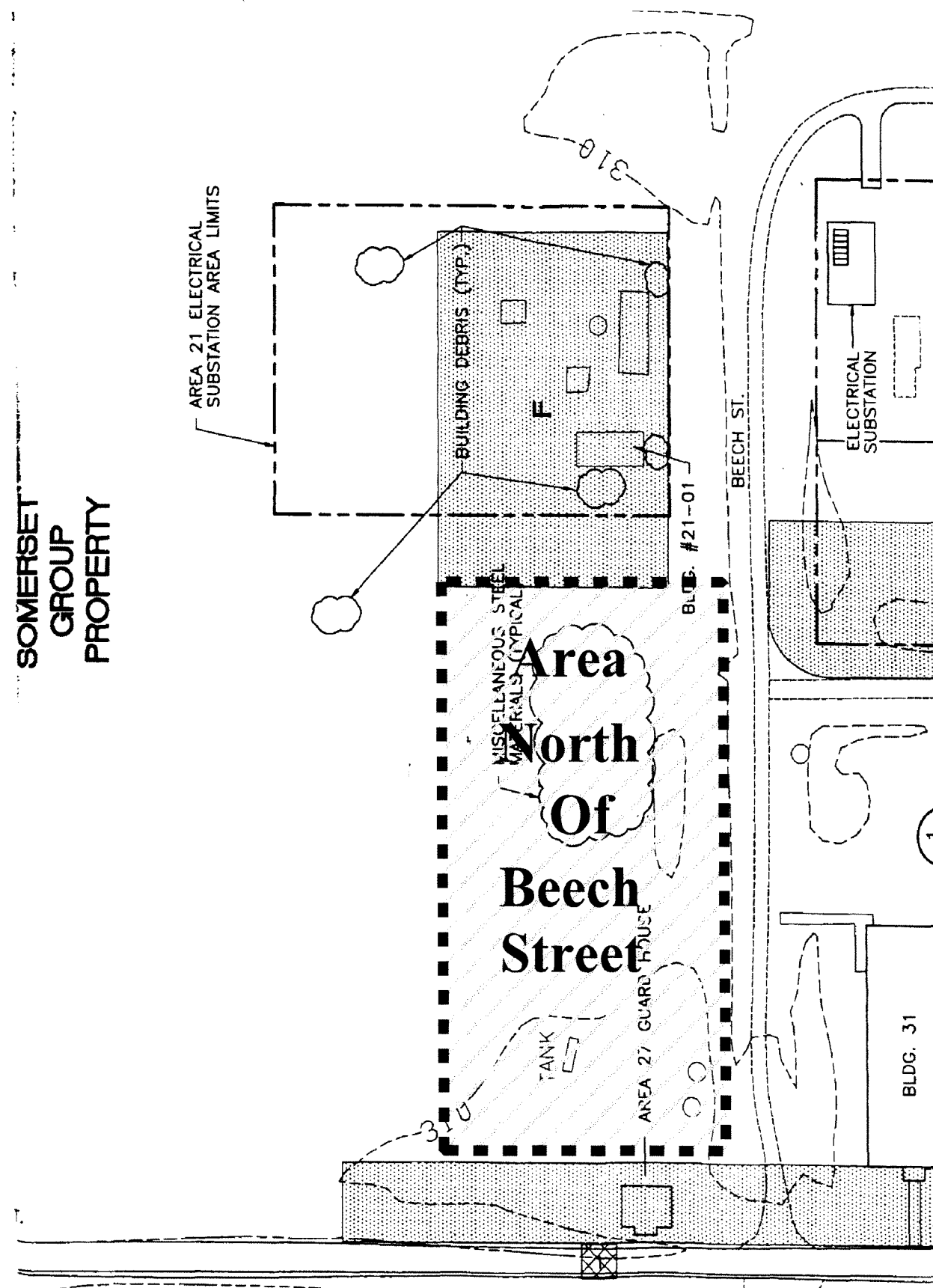


Figure 2



Photo #1

Aluminum Pipe Jacketing in wooded area east of Building 6-01



Photo #2

Aluminum Pipe Jacketing in area east of Building 6-01



Photo #3

Discolored soil beneath Aluminum Pipe Jacketing

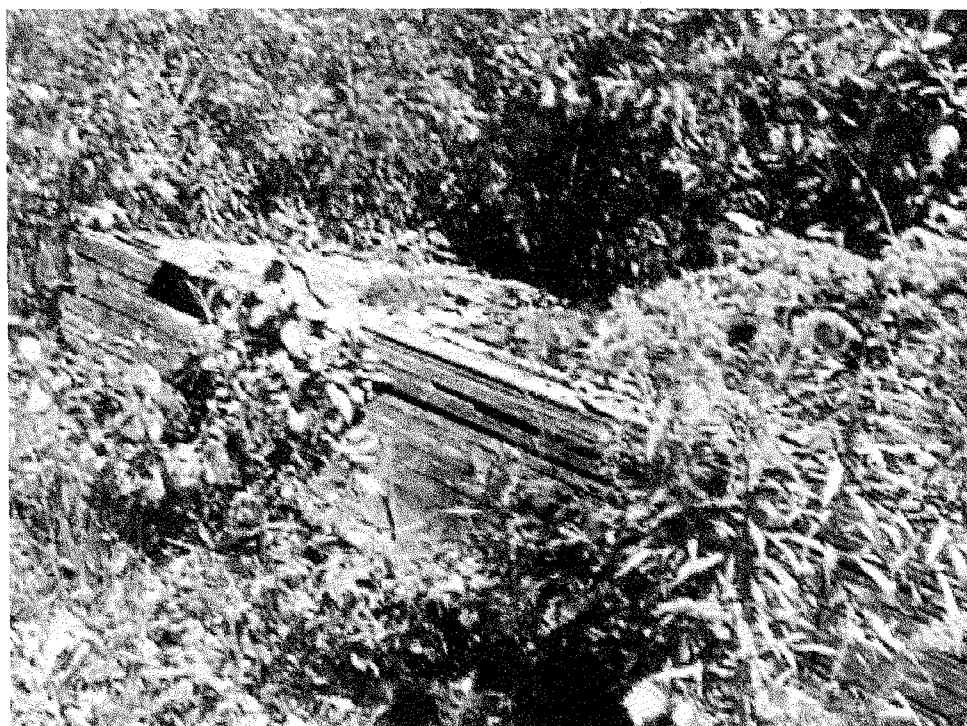


Photo #4

Asbestos containing Transite panels stacked along roadway



Photo #5
Piles of Transite panels in Area north of Beech Street



Photo #6
Pipe insulation on pipe in Area North of Beech Street



Photo #7

PACM and debris at Former AFP-68 Area 7 - Pyrolysis (CWM Property)



Photo #8

PACM pipe insulation located near former AFP-68-Area 16 (Refrigeration & Steam Plant)