

**New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials**

Bureau of Radiation & Hazardous Site Management, Room 460
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June 5, 2000

Mr. Raymond L. Pilon, Project Manager
U. S. Army Corps of Engineers
Buffalo District
1776 Niagara Street
Buffalo, New York 14207-3 199

Dear Mr. Pilon:

Re: Lake Ontario Ordnance Works, Remedial Investigation Phase 2

The New York State Department of Environmental Conservation (the Department) has received the responses to Department comments on the "Draft Addendum to the Work Plan for the Phase I Remedial Investigation for the Lake Ontario Ordnance Works (LOOW), Niagara County, New York for Phase II Remedial Investigation." The draft work plan contains a proposed sampling program for the collection of additional information to investigate environmental impacts from past Federal Government ownership of the property.

Upon review, the Department approves the work plan with the following comments:

Section 1.2 - It is understood that Department of Defense guidance considers asbestos and lead based paint to be ineligible projects for the DERP-FUDS program. However, these contaminants are the result of Federal Government use and ownership of the property. Exposure to these contaminants may pose an unacceptable hazard and should be investigated and/or remediated.

Unused inactive transformers and underground storage tanks do appear to be eligible as a Containerized Hazardous Toxic & Radioactive Waste (CON/HTRW) project.

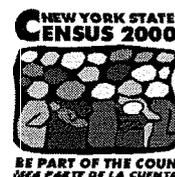
The Department will continue discussions on the eligibility and responsibility of additional areas of the former facility.

Site Specific Sampling and Analysis Plans

General - The response is acceptable.

Section B-1.1 - While the possibility does exist that some of the LOOW underground pipes within Component 1 have been impacted by non-DOD sources, the exclusion of

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Sandy S
Bill K
Chuck B



any pipe from additional investigation should be done on a case by case basis. Department of Defense operations in this area which may have connected to this piping include LOOW buildings 508E (material storage), 707C (change house), 722C (shops), 721B (laboratory) and Navy IPPP buildings E1 & E2 (construction warehouses).

Section B-1.3.3 through Section B-4.2.1 - The responses are acceptable.

Section B-4.3.4 (80 point grid) - Please note that due to debris and the layout of the sampling grid, the actual process area was not sampled as part of the Phase 1 investigation. Otherwise, the responses are acceptable.

Comments on Section B-4.3.4 (location DO) through Section B-6.3.4 - The responses are acceptable.

Sections B-7 through B-11 - The Department does not concur that underground utilities at the site have been adequately characterized and/or addressed.

The response does not address the debris piles west of Building 30.

Section B-7.3.4 through B-8.3.2 - The responses are acceptable.

Section B-8.3.3 - The response is acceptable, pending review of a modified figure illustrating the new proposed locations.

Comments on Sections B-8.3.4 through Section B-14.1 - The responses are acceptable.

If you have any questions, please call me at (5 18) 457-9253.

Sincerely,



Kent D. Johnson
Engineering Geologist II

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any information the Department has on why an exception should be made.

Concur that tanks and transformers are eligible under DERP-FUDS subject to resolution of PRP issues.

Site Specific Sampling and Analysis Plans

General – The response is acceptable.

Section B-1.1 ▪ While the possibility does exist that some of the LOOW underground pipes within Component 1 have been impacted by non-DOD users, the exclusion of any pipe from additional investigation should be done on a cases by case basis. Department of Defense operations in this area which may have connected to this piping include LOOW buildings 508E (material storage), 707C (change house), 722C (shops), 721B (laboratory), and Navy IPPP Building. E1 and E2 (construction warehouses).

USACE RESPONSE: Concur that the inclusion of any pipe for investigation should be on a case-by-case basis. Incidental to the interim removal actions we continue to investigate the LOOW underground utility lines to determine their location and historical use. Subject to resolution of PRP issues, we are committed to fully investigating the underground utility lines.

Section B-1.3.3 – through Section B-4.2.1 -The responses are acceptable.

Section B-4.3.4 (80 point grid) ▪ Please note that due to debris and the layout of the sampling grid, the actual process area was not sampled as part of the phase 1 investigation. Otherwise, the responses are acceptable.

USACE RESPONSE: Rubble and friable asbestos discovered in the course of removing the rubble has been removed from the site. The extensive investigation proposed for Phase II will thoroughly assess impacts from the Area 2 processes.

Comments on Section B-4.3.4 (location DO) through Section B-6.3.4 ▪ The responses are acceptable.

Sections B-7 through B-11 - The Department does not concur that underground utilities at the site have been adequately characterized and/or addressed.

The response does not address the debris piles west of Building 30.

USACE RESPONSE: Response to first comment: see response to comment on Section B-1.1.

Response to second comment: Concur with the comment on the debris pile. An addendum to the work plan has been prepared to include investigation of the debris pile west of Building 30.

Section B-7.3.4 through B-8.3.2 - The responses are acceptable.

Section B-8.3.3 - The Response is acceptable, pending review of a modified figure illustrating the new proposed locations.

USACE RESPONSE: A figure illustrating the new proposed locations has been modified and forwarded to the NYSDEC.

Comments on Sections B-8.3.4 through Section B-14.1 - The responses are acceptable.

If you have any questions, please call me at (518) 457-9253.

Sincerely,

Kent D. Johnson
Engineering Geologist II