

S: 12 September 1988

CEMRK-ED-TD (200-1c)

²²
~~17~~ August 1988

MEMORANDUM THRU: Commander, Missouri River Division, ATTN: CEMRD-ED-EA

FOR: CDR USACE (CEEC-EB)/Dr. Sawdaye, WASH DC 20314-1000

SUBJECT: Defense Environmental Restoration Program (DERP) - Remedial Investigation/Feasibility Study (RI/FS) for Lake Ontario Ordnance Works, Lewiston/Porter, NY, Project C02NY002500

- orig was corrected*
1. Reference ⁶ approved our previous request to expand the scope of the subject project to include all areas of past DOD activities within the boundaries of the former Lake Ontario Ordnance Works (LOOW) that could be potential sources of contamination.
 2. As part of our current effort to accomplish this, we recently visited the property currently owned by the Sommerset Group, Inc. A portion of Air Force Plant 68 was constructed on this property during the late 1950's. Air Force Plant 68 actually consisted of two separate plants (the north plant and the south plant) and included 79 structures. The north plant, located largely on the Sommerset Group property, produced lithium-boron based high energy fuels. The facility was decommissioned by the Air Force in 1959 while the plant was still in pilot plant status.
 3. During our visit to the Sommerset Group property, we toured many structures that were formerly a part of Air Force Plant 68. The condition of the structures varied from piles of rubble to buildings in good condition being beneficially used by the current owner. We identified several areas on the property that should be investigated for hazardous waste contamination; including several fuel storage areas, a manhole likely contaminated with PCB's, and several pits, tanks, and wells. These areas will be included in the next phase of remedial investigations at the former LOOW.
 4. A significant discovery during our site visit was the large amount of asbestos containing materials strewn throughout the property. Apparently, most of these materials were scattered during the process of decommissioning Air Force Plant 68. A significant amount of equipment was salvaged during the decommissioning and walls were torn from the superstructure of buildings in order to gain easy access to the equipment. Asbestos containing materials present on the property included: pipe insulation (both loose and wrapped around pipes), fire resistant wall panels, and asbestos materials used to insulate large boilers (asbestos blocks and asbestos mortar). A stockpile of highly friable asbestos-type mortar was present in one of the buildings toured. Because the walls of this building have been removed, the bags of mortar have been exposed to the outside environment, making the material particularly hazardous. The owner of the property has specifically requested that we address

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the asbestos contamination on the property. It is our understanding that asbestos is not covered under DERP, except coincidentally with demolition of unsafe structures. However, we believe that the presence of asbestos containing materials strewn throughout the property is an exceptional case that merits special consideration for clean-up under DERP. Clearly asbestos materials that are located in buildings currently being beneficially used would not be covered under DERP. However, loose, friable asbestos containing materials that are present as a result of previous DOD decommissioning activities, may warrant consideration for inclusion under DERP.

5. Your decision is requested regarding the appropriateness of addressing the miscellaneous asbestos containing materials on the Sommerset Group property as part of the LOOW RI/FS currently underway. A response to this question is requested by 12 September 1988 so that we can inform the property owner of our position regarding asbestos contamination.

6. Reference:

a. CEMRK-ED-SD letter dated 10 July 1987, Subject: Defense Environmental Restoration Account (DERA) - Remedial Investigation/Feasibility Study (RI/FS) for Lake Ontario Ordnance Works, Lewiston/Porter, NY, Project C02NY002500.

b. CEEC (CEMRK-ED-SD/10 July 87) 1st End, dated 22 July 87, Subject: Defense Environmental Restoration Account (DERA) - Remedial Investigation/Feasibility Study (RI/FS) for Lake Ontario Ordnance Works, Lewiston/Porter, NY, Project C02NY002500.

FOR THE COMMANDER:

PAUL D. BARBER
Chief, Engineering Division

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