



Guterl
200-1f

~~3-16~~
~~128~~
~~128~~
~~128~~
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

04 APR 2001

March 30, 2001

Ms. Diane Kozlowski
U.S. Army Corps of Engineers - Buffalo District
1776 Niagara Street
Buffalo, New York 14207-3199

Re: Guterl Steel Site; Draft Preliminary Assessment/Site Inspection

Dear Ms. Kozlowski:

Enclosed for your consideration are my review comments on the draft Preliminary Assessment/Site Inspection (PA/SI) report on the Former Guterl Specialty Steel Corporation (Guterl Steel) site, Lockport, New York. EPA appreciates the opportunity to review and comment on the draft PA/SI report and remains committed to continuing assistance to the USACE in its efforts at Guterl Steel.

Should you have any questions on the enclosed comments, please feel free to contact me at (212) 637-4002.

Sincerely,

David W. Kluesner
Radiation & Indoor Air Branch

Enclosure

Comments on the Draft PA/SI Report on Guterl Steel
EPA - Region 2; March 30, 2001

- (1) Page 1; 1.0 - Introduction; First Paragraph; Last Sentence: In the review of existing information on the site, who's files were reviewed? And, with regards to the structural inspection, who conducted the inspection and when? The answers to these questions are potentially relevant to the overall PA/SI efforts and would be helpful if included here.
- (2) Page 1; 2.1 - Site Description: The first use of the term "excised property" occurs on this page and then it is used at numerous points throughout the document. Apparently, it is an important factor at Guterl Steel. To ensure clarity and comprehension among the various reviewers of this document, it would be very helpful to include a sentence or two on the definition of "excised property" and what it potentially means to site activities, if any.
- (3) Page 2; Section 2.2 - Operational History and Waste Characteristics; Operational History: EPA's removal efforts in 1996/1997 are relevant and should be mentioned in this section, as well as New York State's surveys of Guterl Steel.
- (4) Page 3; Section 3.2 - Soil and Air Pathways: Is the site impacted at levels above background? What is background? It would be helpful to have a couple narrative statements on this in this section.
- (5) Page 5; Section 4.2 - Ground Water Pathways: Is ground water flow in the direction of the Niagara River? It is not entirely clear from reading the text if it is or is not.
- (6) Page 5; Section 4.3 - Ground Water Pathway Conclusions, First Paragraph: The text indicates that the buildings act as an encapsulant of residual contamination, thereby mitigating transport of contaminants to ground water. However, the roofs in most of the buildings have large holes in them, thereby allowing significant quantities of rain water into the buildings. Additionally, don't some of the buildings have dirt floors? The combination of leaky roofs and dirt floors could induce transport of residual contamination to ground water.
- (7) Page 5; Section 4.3 - Ground Water Pathway Conclusions, Second Paragraph: Will ground water samples be analyzed for both radiological and chemical constituents? It would be helpful to have that stated here.
- (8) Page 5; Section 5.2 - Surface Water Pathways; First (and only) Paragraph; Second Sentence: Typo: It should be "period(s)".
- (9) Page 5; Section 5.3 - Surface Water Pathway Conclusion: The same comment as in Comment 6 above with regards to the leaky roofs.

- (10) Page 6; Section 6.1 - Physical Conditions; Second Paragraph; Last Sentence: Don't you mean Attachment B instead of Attachment C?
- (11) Page 6; Section 6.3 - Building Conclusions; First (and only) Paragraph; Last Sentence: Aren't non-radiological wastes associated with AEC activities also going to be investigated along with radioactive residuals? If so, please state it here.
- (12) Page 6; Section 7.0 - Summary and Conclusions: As part of the conclusions, what about following up on potential leads/questions presented by the community at the February 6, 2001 public meetings on Guterl Steel?
- (13) Additional General Comments on the PA/SI Report:
- The PA/SI report should include a brief summary of the public's involvement at Guterl Steel, such as public involvement activities sponsored by USACE, the public's input and general nature of their comments to date, etc. Basically summarizing their concerns and USACE's efforts to date, which will then serve as a building block for subsequent USACE efforts and write-ups in subsequent reports.
 - You may want to include a brief statement or two in the PA/SI report as to whether or not the Guterl Steel RI will be broken into operable units, and if so, the rationale and plans for those operable units.
- (14) Attachment B - Structural Inspection; Page 1; Executive Summary; Last Paragraph: Isn't there also a guard presence at the site?
- (15) Attachment B - Structural Inspection; Page 1; Section 2.1: With regards to the last sentence of this section pertaining to locating any structural drawings: Have you checked with DOE or searched in old AEC files for any structural drawings?
- (16) Attachment B - Structural Inspection; Page 1 and Beyond: What is the source of information for exact construction dates of buildings?