

COMMENT SHEET FOR GUTERL SPECIALTY STEEL SITE
Combined Preliminary Assessment / Site Inspection Report (March 1, 2001 Draft)

Project: FUSRAP – Guterl Specialty Steel Site _____

Reviewer: New York State Department of Environmental Conservation _____

Date: [REDACTED] _____

COMMENT NUMBER	COMMENT	RESPONSE
1	With respect to the first paragraph of section 2.1, <i>Site Description</i> , the correct current name of Allegheny International is Allegheny Technologies, Inc. not Allegheny Ludlum Corporation.	Language changed accordingly.
2	This Department disagrees with the characterization, on page 2, that the area surrounding the site can be considered industrial in nature. There are residential areas just north of the site.	This paragraph has been removed from the report.
3	In the third paragraph of section 2.2, <i>Operational History and Waste Characteristics</i> , the sentence should read, “Under both contracts, approximately 25 - 35 million pounds of uranium and approximately 30,000 to 40,000 pounds of thorium were subjected to the rolling mill process.” This section should also describe the CERCLA removal action conducted by the US Environmental Protection Agency in 1996 and 1997.	Language changed accordingly. Language added concerning the EPA removal action and the NYSDEC surveys to Section 3.2.
4	Section 3.2, <i>Soil and Air Pathways</i> , refers to potential receptors. It would be helpful to explain that these are potential receptors <u>under current conditions</u> . If the site is not remediated, in the future, other receptors could be exposed to the radioactive contaminants. The trespasser scenario may be unlikely, but based on interviews with Allegheny staff and evidence DEC staff observed in the buildings, it has happened in the past and cannot be ruled out. The statement about ecological receptors being limited by asphalt pavement and	Language added to state, "...under current conditions..." Language also added to state, " However, dirt floors within some buildings support the growth of ferns and moss and evidence of small mammals and birds were observed during site visits."

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	lack of habitat is not well supported. The PA documents that most buildings have dirt floors, which DEC observed, support the growth of ferns and moss in some areas. Signs of small mammals living in the buildings were also observed, along with a large population of swallows. If the site were to be abandoned, more plants and animals would be expected to invade the property.	
5	This Department does not agree with the last sentence of the first paragraph of Section 3.3, <i>Soil Exposure and Air Pathway Conclusions</i> , which states, “The potential for release into the air pathway is low because currently access to the impacted areas is limited preventing disturbance of loose contamination.” Access to the fenced-in excised area is limited, but contamination was found by DEC staff on property outside the fence, which had been cleared, graded, and used to park large vehicles, thus disturbing the soils. This Department’s work and subsequent report, which was provided to the USACE in a November 1, 2000 letter, documented the contamination on this property.	The potential for release to the air pathway is low in potentially affected areas outside of the excised property as well. Snow fencing restricts access to potentially affected areas and letters describing our knowledge of current conditions have been forwarded to a bordering property owner. In the event future investigation indicates a FUSRAP release to air pathways, appropriate action will be initiated.
6	This Department does not agree with the last couple of sentences in the first paragraph of Section 4.3, <i>Ground Water Pathway Conclusions</i> , which state, “These buildings act as an encapsulant of any residual contamination from processes that would induce transport to the groundwater. Also, due to the	Language stating buildings act as an encapsulant has been removed from this section. Further evaluation of groundwater will be conducted during the recommended Remedial Investigation.

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	<p>distance of potable water wells from the site, potential exposure is limited. Furthermore, groundwater usage is limited due to the water service provided by the City of Lockport.” The report and the pictures in the report portray buildings in deteriorating condition with many glass panels missing from the roof and questionable roof integrity, which would allow a substantial amount of rainwater into the buildings. DEC staff reported seeing rain water pouring onto the floor through gaps in the roof during one site visit, as well as areas of standing water. This water could have an impact on groundwater. In addition, it is this Department’s position that all groundwater should be protected as a source of drinking water, whether or not it is currently in use.</p>	
7	<p>With reference to the third bullet of Section 7.0, <i>Summary and Conclusion</i>, this Department understands that this Preliminary Assessment/Site Inspection deals with the Guterl Specialty Steel Corporation property and includes some discussion of the landfill area and other areas throughout Allegheny Ludlum Property. However, there is no mention of vicinity properties. The surveys done by DEC staff would lend supporting documentation for the need for additional investigations of off-site properties.</p>	<p>Language added to state, "... and any potentially affected bordering properties documented in NYSDEC 1999 and NYSDEC 2000b).</p>