

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

**Project:** FUSRAP – Guterl Specialty Steel Site \_\_\_\_\_

**Reviewer:** U.S. Environmental Protection Agency \_\_\_\_\_

**Date:** ██████ \_\_\_\_\_

COMMENT NUMBER	COMMENT	RESPONSE
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.	The information referred to is included in detail throughout the report. Reviewed information is summarized and referenced in the section directly relating to the reviewed report. Furthermore, Attachment B details the structural inspection. This section merely states an overview of the scope for the PA/SI.  A reference to Attachment D has also been added.
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 helpful to include a sentence or two on the definition of the "excised property" and what it potentially means to the site activities, if any.	Language defining the excised property has been added to the second paragraph of Section 2.1.
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.	Language added concerning the EPA removal action and the NYSDEC surveys to Section 3.2.
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.	Background levels have not been determined by USACE. The summarized analytical data is used to determine if there is potential for a significant FUSRAP related release to have occurred to the soil and/or air pathways.

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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.	As stated in Section 4.3, further information is required to confirm the hydrogeologic conditions at the site.
6	Page 5; Section 4.3 - Ground Water Pathway Conclusions; First Paragraph: The text indicates that the building acts 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.	Language stating buildings act as an encapsulant has been removed from this section. Further evaluation of groundwater will be conducted during the Remedial Investigation (RI).
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.	The scope of work and subsequent work plans for the RI will include this information. USACE will coordinate the details of the RI with the USEPA.
8	Page 5; Section 5.2 - Surface Water Pathways; First (and only) Paragraph; Second Sentence: Typo: It should be "period(s)".	Language changed accordingly.
9	Page 5; Section 5.3 - Surface Water Pathway Conclusion: The same comment as in comment 6 above with regards to the leaky roofs.	Language stating the buildings act as an encapsulant have been removed from the report.
10	Page 6; Section 6.1 - Physical Conditions; Second Paragraph; Last sentence: Don't you mean Attachment B instead of Attachment C?	Language changed accordingly.

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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 here.	Language changed to state, " Further investigation should be conducted of Building 1-5, 9, 24 and 35 to further determine if residuals from the nation's early atomic energy program pose a substantial threat of release."
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?	Potential leads and questions presented by the community are being evaluated. The addition of new and confirmed information can be documented in the RI.
13	<p>Additional General Comments on the PA/SI report:</p> <ul style="list-style-type: none"> <li>▪ The PA/SI report should include a brief summary of the public's involvement at Guterl Steel, such as public activities sponsored by USACE, the public's input and general nature of their comments to data, 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.</li> <li>▪ 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.</li> </ul>	<p>These requested additions to the PA/SI report do not support the objective of determining whether there has been a significant FUSRAP related release of contaminants which warrants further evaluation. However, public involvement is an integral part of the CERCLA process and is tracked through our Community Assessments and Community Relations Plan.</p> <p>The technical approach for the RI (operable units) will be determined upon approval of the PA/SI report.</p>
14	Attachment B - Structural Inspection; Page 1; Executive Summary; Last Paragraph: Isn't there also a guard presence	There is a guard presence on the site; however, access to the excised property is significantly limited.

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	on-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?	DOE has provided historical information; however, drawings were not included. Also, the current site owners was unable to locate pertinent structural drawings.
16	Attachment B - Structural Inspection; Page 1 and Beyond: What is the source of information for exact construction dates of buildings?	Exact construction dates for each building were obtained from the ORISE 1999 report.