

New York State Department of Environmental Conservation

Division of Environmental Remediation

Remedial Bureau E, 12th Floor

625 Broadway, Albany, New York 12233-7017

Phone: (518) 402-9814 • Fax: (518) 402-9819

Website: www.dec.ny.gov



Joe Martens
Commissioner

February 20, 2013

Mr. Michael Senus
Project Manager
USACE-Buffalo District
1776 Niagara Street
Buffalo, New York 14207

RE: Former Lake Ontario Ordnance Works – Site No. 932061

Dear Mr. Senus:

The New York State Department of Environmental Conservation (the “Department”) has reviewed the “Groundwater Monitoring Well Decommissioning Work Plan” which was submitted to the Department on January 24, 2013. The work plan proposes monitoring wells to be decommissioned and procedures for accomplishing the task.

Upon review, the Department has the following comments.

- The procedures for decommissioning monitoring wells follow Department guidance and are acceptable.
- No justification is included in the work plan as to why each of the monitoring wells proposed for decommissioning was selected.
- Based on review of Appendix A - Field Inspection Logs, the monitoring wells were not opened as part of the field inspection. It is not clear how the suitability for use was determined.
- The monitoring wells subject to this work plan were installed as part of remedial investigation to assess impacts of past Federal Government activities at the Former Lake Ontario Ordnance Works. As a final remedial decision has not been made for the areas which are the subject of the wells, the need for further investigation and/or monitoring as part of the remedy cannot be determined. The removal of monitoring wells as part of this proposal should not be construed as a determination of no further need for groundwater monitoring and/or remediation.
- It is not clear from the work plan if other stakeholders, including property owners, have had the opportunity to review and comment on the document.

Upon resolution of issues associated with removal of the subject wells, the Department would like to perform oversight on the field work. Please provide the Department a schedule of field activities a minimum of ten (10) business days prior to initiation.

If you have any questions with these comments, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Kent D. Johnson". The signature is written in a cursive style with a large, stylized initial "K".

Kent D. Johnson
Senior Engineering Geologist
Remedial Section B, Remedial Bureau E
Division of Environmental Remediation

ec: D. Weiss, Region 9
D. Radtke