

# New York State Department of Environmental Conservation

## Division of Solid and Hazardous Materials

### Bureau of Solid Waste and Corrective Action, 8<sup>th</sup> Floor

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Erin M. Crotty  
Commissioner

June 17, 2002

Ms. Mary Kay Foley  
Project Manager  
U.S. Army Corps of Engineers  
1776 Niagara Street  
Buffalo, NY 14207

Dear Ms. Foley:

Re: Lake Ontario Ordnance Works  
Towns of Lewiston & Porter, Niagara County

The New York State Department of Environmental Conservation (Department) has received the "Draft Scope of Work for Interim Removal Action at Area A, Former Lake Ontario Ordnance Works (LOOW) DERP/FUDS Site, Lewiston and Porter, Niagara County, New York" (SOW). The SOW outlines work to be performed as part of excavation and removal of a buried drum trench located on CWM Chemical Services Property.

Upon review of the report, Department has the following comments:

Page 01010-2, Section 1.1.2.2: Could the existing "Contaminated Material Storage Area" be used for this removal action?

Page 01010-4, Section 1.1.2.4: Any discharge to the surface water must be approved by CWM.

Page 01010-6, Section 1.1.2.8: Please see comments on Section 02010.

Page 02010-4, Section 3.1.1.2: See comments on Table 02010-1.

Page 02010-4, Section 3.1.1.2.2/ Table 02010-2: Please check the dimensions of the sampling grid. (If the proposed excavation is 55' x 20' x 10', then sidewalls are 20' x 10' and 55' x 10')

Page 02010-4, Section 3.1.1.2.3: Has every drum in the buried disposal trench been fully characterized? If not, full Target Compound List analysis of sample is appropriate.

Page 02010-5, Section 3.1.1.2.4: See comments on Table 02010-1.

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Ms. Mary Kay Foley

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Page 02010-8, Table 02010-1: United States Environmental Protection Agency (USEPA) Region IX PRGs are not applicable in New York State. Clean up objectives should be based on the Department's TAGM 4046 and site background for metals.

Page 02010-10, Table 02010-3: Confirmation samples should be analyzed for full Target Compound List constituents. Samples to be used for site closure determinations should be analyzed at and off-site independent laboratory.

Page 02226-11, Table 02226-1: USEPA Region IX PRGs are not applicable in New York State. Clean up objectives should be based on NYSDEC TAGM 4046 and site background for metals.

Page 02226-12, Table 02226-2: Please check the dimensions of the sampling grid. (If the proposed excavation is 55' x 20' x 10', then sidewalls are 20' x 10' and 55' x 10')

Page 02226-13, Table 02226-3: Confirmation samples should be analyzed for full Target Compound List constituents.

If you have any questions, please call me at (518) 402-8594.

Sincerely,



Kent D. Johnson  
Engineering Geologist II

cc: R. Park-Zayatz, CWM  
C. Stein, USEPA Region II