



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY

BUFFALO DISTRICT, CORPS OF ENGINEERS
1776 NIAGARA STREET
BUFFALO, NEW YORK 14207-3199

SEP 27 2004

Special Projects Branch

SUBJECT: Former Lake Ontario Ordnance Works (LOOW) Walkover and Surface Removal of TNT, 2003; dated June 2004

Mr. Kent Johnson
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233

Dear Mr. Johnson:

Thank you for your comments regarding the subject after action report, submitted on August 17, 2004. USACE concurs that additional investigation and remedial action is required in the subject areas and has requested funding accordingly. Please note that based on information collected to date, the presence of residual TNT is located in well marked areas, where Chemical Waste Management controls access. Therefore, although additional work is required, these areas do not pose an immediate threat to human health or the environment in regards to the Department of Defense related contaminants. Once available funding is secured, USACE will develop work plans to outline follow on work and coordinate these plans with you.

Please find responses to your specific comments below.

1. Comment 1: Page 4, Section 2.0. third paragraph: The report states that: "over 90 pounds of surface TNT were collected in zone 3". It is not clear from the report whether or not the ninety pounds represent actual TNT, TNT containing material, TNT contaminated soil or blended TNT material and sand. Please clarify.

- Response: TNT Containing Material strength of TNT varied greatly from 5% to some chunks at 80-90%.

2. Comment 2: Page 5, Disposal of Blended TNT and Sand: This section states that samples of the blended material were taken and "processed" to insure the blended/mixed sand was less than 10% explosive. The data supporting this statement is not included in the report. Please provide all analytical data associated with this fieldwork.

- Response: Results from the field test kits were not recorded; however, samples were sent to the laboratory to confirm material was less than 10% explosive. The laboratory data that supports the statement is provided by in Appendix D of the report.

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3. Comment 3: Page 10, Section 4.0: Please provide additional discussion of the Expray TNT indicator spray including its reliability and detection capability.

- Response: Additional information regarding the test kits is attached.

4. Comment 4: Page 10, Section 4.1: Please clarify how many points were composited when sampling the mixed sand/TNT material.

- Response 4: Once ten (10) pounds were accumulated that amount was transported by hand to area C to be blended. Once each 10-pound sample was completely blended at least five to six samples were composited from that specific location and tested.

As always, feel free to contact me by phone, at 716-879-4119, or by e-mail, at david.romano@usace.army.mil, if you have any additional questions or comments.

Sincerely,



David Romano
Project Manager

Encl.

CC w/encl:

Matt Forcucci; NYSDOH

John Battaglia; LOOW RAB Technical Committee Chair