



**DEPARTMENT OF THE ARMY
BUFFALO DISTRICT, CORPS OF ENGINEERS
1776 NIAGARA STREET
BUFFALO, NEW YORK 14207-3199**

REPLY TO
ATTENTION OF

16 November 1998

Project Management

SUBJECT: NYSDEC Comments, Lake Ontario Ordnance Works Interim Removal Action

Mr. Kent D. Johnson
New York State Department of Environmental Conservation
Bureau of Hazardous Waste Facilities, Room 460
50 Wolf Road
Albany, New York 12233-7252

Dear Mr. Johnson:

This is in response to your October 26, 1998 letter concerning your observations resulting from your site visit to the Somerset property on October 15, 1998. The Somerset property is a parcel located on the former Lake Ontario Ordnance Works, Niagara County, New York.

As you are aware, the Corps of Engineers had a site meeting on October 14, 1998 with the Somerset property owner. We regret you were unable to attend our meeting.

I believe all the concerns identified in your letter have been properly addressed. For the purpose of clarity, your comments followed by our responses are attached.

If you have any questions, or require any additional information, please do not hesitate to call me at (716) 879-4146.

Sincerely,

Raymond L. Pilon
Project Manager

CF:

C. Anuszewski, USACE-Baltimore District
J. Syms, Somerset Group
R. Park-Zayatz, CWM
R. Demus, Town of Lewiston
T. Beachy, Town of Porter
T. Lehmann, NYSDEC-Buffalo

J. Strickland, NYSDEC Region 9
P. Buechi, NYSDEC Region 9
C. Stein, USEPA Region II
D. Brouwer, USACE-New Jersey Proj. Ofc.
A. Warminski, USACE-Baltimore District
S. Lal, USACE-Baltimore District

PROJ_0948

**LAKE ONTARIO ORDNANCE WORKS
SOMERSET PROPERTY INTERIM REMOVAL ACTION
REPSONSE TO NYSDEC COMMENTS DATED 15 OCTOBER 1998**

COMMENT 1: Pieces of potential asbestos containing materials (PACM) (pipe insulation, broken transite panel) were noted in areas which have been excavated (Photo #1). Additional measures need to be taken to clean up areas which remain to be visually contaminated after excavation.

RESPONSE 1: Excavation operations are still ongoing. Based on our October 14, 1998 inspection, it was determined that additional measures needed to be taken to remove contaminants below the 6-inch depth requirement and this is being addressed in a contract change order. You should be aware that upon completion of excavation operations, all areas are inspected to insure proper removal of asbestos materials.

COMMENT 2: The depth of soil excavation is not a uniform 6 inches as called for in the specifications. Actual excavation depths ranged from <1" to 6". In order to Assure that soils have been removed in accordance with the specified depths, the areas should be surveyed before and after excavation activities.

RESPONSE 2: Depth of soil excavation is not 6-inch uniform due to the extent of contamination in some areas exceeding the 6-inch depth requirement. Actual excavation depths range from 6-inches to 18-inches in some areas. In addition, excavation boundary limits have been extended in all areas by 1 to 2 feet to insure all contaminants were removed.

COMMENT 3:PACM was noted in areas beyond the proposed limits of excavation (south fence line (Photo #2). The area of excavation should be expanded to the fence line, to address the impacted areas.

RESPONSE 3: Review of the excavation areas in the contract specifications adequately addresses this concern. The limits of excavation in Area C include the area up to the fence line and excavation operations in Area C did not commence until October 26, 1998. In addition, a contract change order will expand excavation operations in Area E to include the south fence line area.

COMMENT 4: a DEBRIS PILE, WEST OF Building 30A (depicted on Plate 4 of the 100% Design Report and Photo #3) containing ACM pipe insulation needs to be addresses. This area must be adequately addressed.

RESPONSE 4: The debris pile west of Building 30A was adequately addressed on October 26, 1998. ACM pipe insulation was glove-bagged and the area was immediately HEPA vacuumed. Inspections have confirmed the area is clean of ACM.

COMMENT 5: Debris piles within Areas 3 & 5, need to be fully removed. This is listed as part of the preferred action on Page 2-10 of the Final Design Analysis Report. Areas of mounded debris need to be excavated a minimum of 6" below the original grade.

RESPONSE 5: Excavation operations in Areas 3 and 5 commenced on October 26, 1998. The debris piles were excavated and the soil below the mounds was excavated to a minimum of 6-inches below the original grade.

**LAKE ONTARIO ORDNANCE WORKS
SOMERSET PROPERTY INTERIM REMOVAL ACTION
RESPONSE TO NYSDEC COMMENTS DATED 15 OCTOBER 1998
(cont'd)**

COMMENT 7: Equipment leaving remedial areas are tracking potential contaminated materials out of the areas. Section 02080, Part 3.2 of the Final Design specifications requires the protection of adjacent areas. The practice of allowing vehicles to leave contaminated areas without decontamination is not acceptable.

RESPONSE 7: The tires of equipment leaving remedial areas are decontaminated and inspected prior to leaving areas to insure that contaminated materials are not tracked out of the areas. Manufactured roadway covering is constructed to lay across roadways to allow for the access of track equipment to enter from area to area. Roadway covering consists of plywood covered and sealed with multiple layers (3) of 6-mil poly sheeting laid across designated travel paths. Double layer of 6-mil poly sheeting is then laid across covered plywood. Once equipment is transported across to new areas, poly sheeting is wrapped up and properly disposed. I understand that during your site visit, track equipment remained in Area E and forklifts were doconned prior to exiting building 6-01. In addition, the decontamination facility for materials stored in building 6-01 was intact and used to decon forklifts prior to exiting.

COMMENT 8: No vehicle decontamination area was in place. Decontamination of personal and equipment leaving areas subject to asbestos abatement is required as part of the Asbestos Hazard Abatement Plan and Industrial Code Rule 56.

RESPONSE 8: Reference response 7 above. Temporary vehicle (forklift) decontamination facility was in place at the time of your site visit. The decontamination facility was located in the courtyard between sections of building 6-01. A variance for the use of a remote decon facility was submitted and approved in accordance with Industrial Code Rule 56.

COMMENT 9: The interior of Building 30A needs to be pressure washed and floor drain needs to be cleaned out.

RESPONSE 9: Building 30A was completed on August 28, 1998. The floor drain was covered with two layers of 6-mil poly to prevent water from entering the drain. Clearance samples for PCM and TEM were collected and found to be below detection and swipe samples of the interior of building 30A have been found to be below detection.

COMMENT 10: Site roadways are covered with materials tracked out of excavated areas and need to be cleaned up.

RESPONSE 10: Site roadways are scheduled to be cleaned at the completion of the project. Materials deposited on the roadway are a direct result of roadway and areas being wetted down.

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SOMERSET PROPERTY INTERIM REMOVAL ACTION
RESPONSE TO NYSDEC COMMENTS DATED 15 OCTOBER 1998
(cont'd)**

COMMENT 11: Drainage swale south of Building 30A, which was excavated, needs to have a proper grade reestablished to assure proper drainage. No sedimentation controls were in place at excavated areas.

RESPONSE 11: Backfill and grading operations began on November 5, 1998. Areas will be graded to assure the establishment of proper drainage.

COMMENT 12: A final inspection and documentation of excavated areas to ensure the attainment of remedial goals needs to be performed prior to backfilling with clean fill.

RESPONSE 12: Inspections have been and are continuously made to ensure the attainment of remedial goals. Analytical results of clearance sampling are located on-site and will be submitted at the conclusion of the project. Areas cleared are documented on daily reports.

COMMENT 13: Building 21-01 (Photo #6), groundwater monitoring wells north of Area 18N and a fire hydrant west of Area 18N (Excavation Area E) have been damaged by heavy equipment. Property damages caused by USACR contractors must be properly repaired.

RESPONSE 13: Property damages caused during the course of operations have been adequately addressed during our October 14, 1998 site meeting with the property owner (Mr. John Syms). We regret you could not attend that meeting.