

## **Pilon, Raymond L LRB**

**From:** Kent Johnson [kdjohnso@gw.dec.state.ny.us]  
**Int:** Tuesday, May 04, 1999 11:17 AM  
**To:** Raymond.L.Pilon@lrb01.usace.army.mil  
**Cc:** basham@charles.dec.state.ny.us; charles.E.bashham@nab02.usace.army.mil  
**Subject:** Draft response letter on TNT Line IRA

5 May 1999

Chuck / Alan:

Here is a draft reply from Kent Johnson.

Mr. Johnson has similar concerns than we do related to the lack of a WES workplan.

At this time, I am recommending that we notify WES that if we do not receive their workplan with one week, we will modify our contract to provide for complete disposal by our contractor.

Please advise WES that we will plan to withdraw our funds from their MIPR and use the dfunds on our contract as a result.

Thanks.

Ray Pilon

Dear Mr. Pilon,

In an effort to save time, I am sending you the following letter electronically. (I put it in the message area so that there wouldn't be a problem reading it). Since, based on the 4/16/99 pre-construction meeting, the requested plans are in the process of being completed, this shouldn't result in much of a delay. Please let me know if you have any questions.

Sincerely, Kent Johnson

April 29, 1999

Mr. Raymond L. Pilon  
Project Manager  
U. S. Army Corps of Engineers  
Buffalo District  
1776 Niagara Street  
Buffalo, New York 14207-3199

RE: Lake Ontario Ordnance Works - TNT Pipelines & Chemical Waste Sewer Line Interim Removal Action

Dear Mr. Pilon:

The New York State Department of Environmental Conservation (the Department) has reviewed the responses to comments on the TNT Pipelines & Chemical Waste Sewer Line Interim Removal Action at the former Lake Ontario Ordnance Works, Town of Porter, Niagara County, New York. The IRA consists of cleaning and removal of liquids and sediments from the Chemical Waste Sewer and associated lift stations; and cleaning and removal of liquids and sediments from the TNT waste pipelines followed by removal or closure in-place of piping sections. The comments and the work plan were discussed as part of the April 16, 1999 pre-construction meeting held at the USACE Buffalo District offices.

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

1) Waste Disposal: The Department can not approve of waste material being sent the U.S. Army Corps of Engineers Waterways Experimental Station (WES) for treatment until a formal treatment work plan has been submitted and reviewed.

2) TNT Line Video Survey: In order to determine the effectiveness of the cleaning, pipeline segments scheduled to be closed in-place must be video surveyed after cleaning.

3) Treatment of Explosive Materials: The Department can not approve the "Ordnance & Explosives Support Services Work Plan" until the following has been submitted and reviewed:

Acknowledgment and acceptance from the New York Army National Guard for the use of their property to deactivate explosive materials.

Figure which depict the location and design of the "deactivation" area.

A plan for the removal and handling of residues from the deactivation of explosive materials and restoration of the deactivation area after completion of the project.

4) Final Design Drawings: A set of design drawings for the project, including the location of staging and stockpile areas must be submitted and reviewed.

In an effort to minimize possible delays in the field program, the Department will expedite review of the submitted plans. If you have any questions, please contact me at (518) 457-9253.

Sincerely,

Kent D. Johnson  
Engineering Geologist II

CC: C. Basham, USACE - Baltimore District  
J. Syms, Somerset Group  
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