

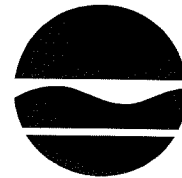
New York State Department of Environmental Conservation

Division of Solid and Hazardous Materials

Bureau of Hazardous Waste Facilities, Room 460

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Phone: (518) 457-9253 FAX: (518) 457-9240



John P. Cahill
Commissioner

August 11, 1998

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, Component 2 -Phase 1 Interim Removal Action

Dear Mr. Pilon:

The New York State Department of Environmental Conservation (the Department) has reviewed the draft submittals for the Component 2 -Phase 1 Interim Removal Action at the former Lake Ontario Ordnance Works, Town of Porter, Niagara County, New York. The IRA consists of Asbestos abatement at six (Buildings 6-01, 6-02, 6-03 & 30A: Areas T1-T2 and the Pipe Bridge) areas and removal of miscellaneous chemicals and oils on property currently owned by the Somerset Group. The submittals include:

- Contractor Quality Control Plan
- Site Operations Plan/Site Schedule
- Asbestos Hazard Abatement Plan
- Permit and Variance Documents
- Project Notification
- Contractor Qualifications
- Employee Certifications
- Equipment and Materials Specifications Product MSDS Sheets
- Site-Specific Health and Safety Plan

Upon review, the Department has the following comments:

Contractor Quality Control Plan

The Department finds the Plan to be acceptable and is hereby approved.

Site Operations Plan/Site Schedule

General: The numbering of sections in the Plan is inconsistent and confusing. Is there something missing?

Page 1, Temporary Facilities Plan: The proposed location of the office trailer is within an area (Area D) which is scheduled to have soil excavation as part of Phase 2 of the removal action and should be relocated.

Page 1, Environmental Products and Services, Inc. Control Plan: The first paragraph of this section states: "No permits will be required by the town for this work.". Page 1 of the Final Permit Application Report states: "A demolition permit will be required from the town of Porter for the removal activities. Please resolve.

Where are the specifications and design for the staging area, lay down areas and decontamination areas?

Where is the Erosion and Sedimentation Control Plan? See Section 01561, Part 6 of the Final Contract Specifications for details.

Page 2, Soil Backfill Grading Plan: It is not clear from the plan whether the temporary contaminated soil staging area, discussed in this Section is different from the Clean fill staging area discussed in the Environmental Products & Services Control Plan. Please clarify.

Also this section does not include sufficient information listed in section 02210 of the Final Contract Specifications to be acceptable.

Page 2, Off-site/On-site Hazardous Waste Management: All wastes streams must be characterized in order to make a hazardous waste determination prior to shipment and disposal.

Will the various chemicals (Acids, Bases & Organics) located in Building 30A be compatible for the proposed consolidation?

Please identify the testing and proposed disposal site for the three (3) unknown drums in building 601.

Attached Figure (Figure 1?): What does this figure signify? Also, the location of the Pipe Bridge is incorrect. The correct location is in the southwestern portion of the Somerset Group property, spanning the Central Drainage Ditch.

Project Schedule: The removal of miscellaneous oils and chemicals is not included on the schedule. Please amend.

Asbestos Hazard Abatement Plan

General: Please note that, consistent with Section 02080-1.11.1 of the Final Contract Specifications, this plan must be accepted in writing prior to the start of any asbestos abatement work.

Where is the “Negative Exposure Assessment” to be submitted per the requirements of 29 CFR1926.110(f)(2)(iii)? This document must be approved prior to start of work.

Building 6.01, Task 2; Pipe Bridge, Task 1: What is the status of the variance request sent to the Department of Labor? Are there contingencies in place if the variances are not approved?

Page 10, Clearing and Grubbing: The Plan states that: “details (on the clearing and grubbing) will be provided when a subcontractor has been chosen”. Please provide the details as soon as possible since this is the first task to be undertaken. Also note that the procedures must be in accordance with Section 02110 of the Final Contract Specifications.

Permit and Variance Documents

No Comments

Project Notification

No Comments

Contractor Qualifications

No Comments

Employee Certifications, Laboratory Certifications

No laboratory certifications are included in this Section. The laboratory certifications need to be consistent with the requirements of Section 02080-1.11.3.B of the Final Contract Specifications. Please provide.

Equipment and Materials Specifications Product MSDS Sheets

No Comments

Site-Specific Health and Safety Plan

No Comments

Mr. Raymond L. Pilon

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The above comments are substantial enough to warrant delaying the initiation of field activities until the major issues are resolved. In an effort to resolve the comments, the Department wishes to attend the "preconstruction conference" which is required as part of Section 01010-1.6 of the Final Contract Specifications. Please contact me at (518) 457-9253 to arrange a meeting date.

Sincerely,



Kent D. Johnson
Engineering Geologist II

CC: J. Wesley, USACE - Baltimore District
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