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Langan Marcii
 Commissioner

December 30, 1994

U.S. Army Corp of Engineers
 Baltimore District
 (attn: CENAB-EN-HN, Ms. Justina Wesley)
 City Crescent Building, Room 10200
 10 South Howard Street
 Baltimore, MD 21201

Re: Draft EE/CA

Dear Ms. Wesley:

The New York State Department of Environmental Conservation and United States Environmental Protection Agency have reviewed the "Draft Engineering Evaluation/Cost Analysis (EE/CA) for Removal Actions in Operable Units 1 and 2" for the former Lake Ontario Ordnance Works (LOOW) located in Lewiston/Porter, New York. The purpose of the EE/CA is to address interim removal actions measures at several identified areas at the LOOW site and to evaluate removal action alternatives in terms of effectiveness, implementability and cost criteria.

Upon review of the draft EE/CA, the agencies find the removal plans recommended to be a reasonable step in the remediation of the LOOW. The agencies view the removal actions proposed in the EE/CA as an interim action. Additional investigation, and possibly, remedial actions, will be necessary before a final remedial decision for the former LOOW can be made. In addition, the agencies offer the following comments to the draft report:

Page 5-12, Section 5.2.1, Alternative 3: Under the Section C.1.a, consideration 5 acknowledges that the excavated material may require treatment prior to disposal, in accordance with Land Disposal Restrictions (LDRs) if concentrations exceed LDR values. However, in Appendix B (Excavation-Disposal) does not appear to include costs which may be necessary to reduce the concentrations of contaminants in the excavated material to LDR levels.

Page 5-14, Section 5.2.1, Item C.1: Since active landfill disposal of contaminated material is on-going at the CWM Chemical Services facility, why is landfill disposal of the contaminated material from Area A not expected to be readily accepted by the public?

Page 5-14, Section 5.2.2: Change the second remedial alternative from removal-fixation-disposal to removal-treatment-disposal.

Page 5-38, Section 5.2.3.3: Attached are copies of a September 1981 drawing of the location and status (as of the drawings date) of underground lines at the CWM Chemical Services facility. CWM should be contacted to determine the current status of underground lines (whether they have been removed).

In addition, it appears from Figure 2-18, that a portion of the TNT lines run under the North Salts area or the northern berm of this inactive surface impoundment. If this is correct, extra precautions will need to be taken to ensure the stability of the berm.

Page 5-50, Section 5.3: Please be advised that, depending on the results of post-removal verification sampling and sampling of groundwater accumulation in excavations, a groundwater remedial system may be required as part of the long-term remedy for the Areas A & B, the TNT lines and the chemical waste sewer system.

Page 5-51, Section 5.3, Alternative 1: Aqueous treatment at CWM will be feasible depending on the capacity of the facility to handle the volume of water generated. Alternatives 2 and 3 also appear to be feasible.

Page 7-1, Section 7: All of the preferred removal actions will require confirmation sampling to assure that clean-up criteria have been achieved.

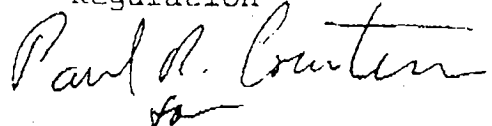
If you have any questions on these comments please contact Mr. Kent Johnson (NYSDEC) at (518) 457-9255 or Ms. Carol Stein (USEPA) at (212) 264-5130.

Sincerely,



Paul R. Counterman, P.E.
Chief
Bureau of Western
Hazardous Waste Programs

Division of Hazardous Substances
Regulation



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Chief
Hazardous Waste Facilities Branch
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- cc: C. Stein, USEPA, Region II
- J. Strickland, Region 9
- J. Pizzuto, CWM
- ✓ W. Wertz
- K. Johnson