

**FINAL RESPONSES TO ADDITIONAL NYSDEC COMMENTS
ON PHASE II ADDENDA
(20 November 2000)**

Section 1.2 – It is understood that Department of Defense guidance considers asbestos and lead based paint to be ineligible projects for the DERP-FUDS program. However, these contaminants are the results of Federal government use and ownership of the property. Exposure to these contaminants may pose an unacceptable hazard and should be investigated and/or remediated.

Unused inactive transformers and underground storage tanks do appear to be eligible as a Containerized Hazardous Toxic & Radioactive Waste (CON/HTRW) project.

The Department will continue discussions on the eligibility and responsibility of additional areas of the former facility.

USACE RESPONSE: Section 1.2. Asbestos and lead can be addressed under the DERP-FUDS program on an exception basis. For example, we have removed asbestos from the LOOW site at several locations due to life-safety concerns for workers on site during the Phase II RI Investigation. Considering the location of this site and the restricted access to it, the Corps of Engineers does not recognize any immediate hazards from lead or asbestos contamination that would justify an exception to the Department of Defense policy on asbestos and lead contamination at Formerly Used Defense Sites. The Corps of Engineers is willing to entertain any information the Department has on why an exception should be made.

Concur that tanks and transformers appear to be eligible under DERP-FUDS subject to subsequent beneficial use by other parties.

Site Specific Sampling and Analysis Plans

General – The response is acceptable.

Section B-1.1 - While the possibility does exist that some of the LOOW underground pipes within Component 1 have been impacted by non-DOD users, the exclusion of any pipe from additional investigation should be done on a cases by case basis. Department of Defense operations in this area which may have connected to this piping include LOOW buildings 508E (material storage), 707C (change house), 722C (shops), 721B (laboratory), and Navy IPPP Building. E1 and E2 (construction warehouses).

USACE RESPONSE: Concur that the inclusion of any pipe for investigation should be on a case-by-case basis. Incidental to the interim removal actions we continue to investigate the LOOW underground utility lines to determine their location and historical use. Subject to resolution of PRP issues, we are committed to fully investigating the underground utility lines.

Section B-1.3.3 – through Section B-4.2.1 -The responses are acceptable.

Section B-4.3.4 (80 point grid) - Please note that due to debris and the layout of the sampling grid, the actual process area was not sampled as part of the phase 1 investigation. Otherwise, the responses are acceptable.

USACE RESPONSE: Rubble and friable asbestos discovered in the course of the investigation has been removed from the site. The extensive investigation proposed for Phase II will thoroughly assess impacts from the Area 2 processes.

Comments on Section B-4.3.4 (location D0) through Section B-6.3.4 - The responses are acceptable.

Sections B-7 through B-11 - The Department does not concur that underground utilities at the site have been adequately characterized and/or addressed.

The response does not address the debris piles west of Building 30.

USACE RESPONSE: Response to first comment: see response to comment on Section B-1.1.

Response to second comment: Concur with the comment on the debris pile. An addendum to the work plan has been prepared to include investigation of the debris pile west of Building 30.

Section B-7.3.4 through B-8.3.2 - The responses are acceptable.

Section B-8.3.3 - The Response is acceptable, pending review of a modified figure illustrating the new proposed locations.

USACE RESPONSE: A figure illustrating the new proposed locations has been modified and forwarded to the NYSDEC.

Comments on Sections B-8.3.4 through Section B-14.1 - The responses are acceptable.