



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

October 7, 2011

REPLY TO  
ATTENTION OF

Special Projects Branch

**SUBJECT: Final Field Sampling Plan Addendum (Plan) for Occidental Chemical Corporation (OCC) and Wastewater Treatment Plant (WWTP), Data Gap Investigations at the Former Lake Ontario Ordnance Works (LOOW), Niagara County, New York**

Redacted-Privacy Act

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Ms.

Thank you for providing your comments on the above mentioned sampling plan. Your comments were considered and evaluated by the Lake Ontario Ordnance Works Site Team and the final field sampling plan will not be amended. Based on our evaluation, we offer the following explanation:

a. There are no surface water features on the Occidental Chemical Corporation property that would enable contaminant migration from the former disposal area to the Lewiston-Porter School District property.

b. We are in an ongoing process of evaluating our current data for the entire site. The Corps will reassess the Occidental property after evaluating the new data gathered during the upcoming sampling event. If it is determined that additional sampling is necessary at that point, we will keep your comments in mind for future sampling.

c. Although a 2001 fact sheet states that trace levels of explosives were found in the disposal area, the Corps has further investigated the area and will be updating the risk assessment of this property based on all new investigation results.

d. All property ground scars were considered for sampling. However, based on a thorough review of prior land-use activities, previous investigations on small-bermed clearings, and upon visual inspections during ground reconnaissance visits, all anomalies were prioritized and assessed. Suspect anomalies were chosen for further investigations.

e. Further analysis of site contamination will be evaluated during the comprehensive remedial investigation report.

Office: Special Projects Branch  
Subject: Low-Port Sampling Strategy

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We appreciate your input. A copy of this letter is being provided to the following: Mr. Redacted-Privacy Act; Mr. Dan Stapleton, Niagara County Department of Health; Mr. Kent Johnson, New York State Department of Environmental Conservation; the Occidental Chemical Corporation; and Mr. Chris Roser, Lewiston-Porter Central School District.

Sincerely,

/s/

Mick Senus  
Project Manager