

To 58-12
~~XXXXXXXXXXXXXXXXXXXXXXXXXXXX~~

August 18, 1997

Engineering and
Environmental Office

Mr. Marsden Chen
NYS Department of Environmental Conservation
Bureau of Eastern Remedial Action
Division of Hazardous Waste Remediation
50 Wolf Road, Room 208
Albany, New York 12233-7010

Dear Mr. Chen:

This letter is in response to your August 7, 1997 correspondence expressing concern for clearance of unexploded ordnance (UXO) at Seneca Army Depot Activity.

The Army has an established procedure regarding the requirements for parcels which may have UXO concerns. The procedure includes an archive search of historical records, employee interviews, and physical survey of suspect areas. The Environmental Baseline Survey (EBS) completed March 12, 1997 included interviews and a visual surface survey of suspect areas. The archive search is scheduled to be accomplished in FY98 pending availability of funds.

Upon completion of the archive search and incorporation of the EBS information, appropriate methods to sweep the identified areas looking for UXO will be programmed. The depth to which UXO is

investigated is dependent on the proposed land use. The Department of Defense Explosive Safety Board is the recognized agency responsible for approval of all explosive-involved operations and will approve the Work Plans for the UXO sweeps.

It is the Department of Army policy that all land transferred from federal control to public or private sectors which require remediation of hazardous constituents including UXO have the remediation protective of human health and the environment. As required with all Superfund activities, this policy does not imply that areas are "clean" but rather areas with residual contamination including UXO are within acceptable risk. This policy is not consistent with your request to confirm that Seneca Army Depot Activity is free and clear of unexploded ordnance.

Should you have any questions, please contact Stephen M. Absolom at (607) 869-1309.

Sincerely,

Donald C. Olson
LTC, U.S. Army
Commanding Officer

Copies Furnished:

Ms. Carla M. Struble, P.E., U.S. Environmental
Protection Agency, Emergency and Remedial Response
Division, 290 Broadway, 18th Floor, E-3, New York,
New York 10007-1866

Commander, U.S. Army Industrial Operations Command,
ATTN: AMSIO-EQE (Ed Agy), Rock Island, Illinois
61299-6000

Commander, U.S. Army Environmental Center, ATTN:
SFIM-AEC-IRP (Jeff Waugh), Aberdeen Proving Ground,
Maryland 21010-5410

**New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-7010**



**John P. Cahill
Commissioner**

August 7, 1997

Mr. Stephen Absolom
Chief, Engineering and Environmental Division
Seneca Army Depot Activity (SEADA)
5786 State Route 96
Romulus, NY 14541-5001

Dear Mr. Absolom:

It is not clear to the NYSDEC that a comprehensive investigation for unexploded ordnance has been undertaken at your facility. Under the current Superfund activities, the focus has been on the typical Target Compound List contaminants, and this may prove to be insufficient.

NYSDEC realizes that due to the nature of your facility's past military activities, it is possible that ordnance could have been misplaced or buried on site; we will not know this without a physical, active search. We find that a literature search of past activities and interviews of knowledgeable personnel are useful in locating areas of concern, but such actions many times do not provide clear answers. In fact, we have noted with unsettling frequency at many other Superfund sites, that the physical investigations have found hazardous waste in areas which were cleared by the reviews and interviews.

Irrespective of the NYSDEC's approvals of FOSL's, FOST's (where applicable) and ROD's for various parcels of land and OU's and participation in remedial investigations, I am requesting that you investigate and confirm that your property is free and clear of unexploded ordnance.

Sincerely,

Marsden Chen
Bureau of Eastern Remedial Action
Division of Environmental Remediation

c: R. Wing, USEPA-Region II
J. Lister
J. Greco
J. McCullough