NIAGARA COUNTY DEPARTMENT OF HEALTH
ENVIRONMENTAL HEALTH DIVISION
5467 Upper Mountain Road, Suite 100
Lockport, New York 14094-1894

(716) 439-7444
(716) 439-7427 FAX

January 14, 2016

U.S. Army Corps of Engineers, Buffalo District
Attention: Environmental Project Management Team
1776 Niagara Street
Buffalo, NY 14201

Re: Feasibility Study and Proposed Plan, Interim Waste Containment Structure Operable Unit, Niagara Falls Storage Site

Dear Environmental Project Team:

This Department has reviewed the selected "Alternative 4" referenced in the above noted document and understands it is the U.S. Army Corp's preferred alternative, stating it will provide the best overall protection of human health and the environment. The Niagara County Department of Health (NCDOH) agrees that Alternative 4, which provides for excavation, partial treatment, and off-site disposal of the entire contents of the Interim Waste Containment Structure, is the best alternative that will ultimately provide the greatest protection to Niagara County residents by removing the residues from Niagara County for all time.

The Department has had concerns that data gathered during the Remedial Investigation phase of the project has been suspect with regard to potential for leakage, and/or represents legacy contamination that is making ongoing monitoring for leakage difficult. Maintenance of effort to care for the facility has been excellent to date but can't be guaranteed due to the unpredictability of future social, economic, and natural conditions that could jeopardize the financial commitment of the federal government to continue that care indefinitely.

We commend the U.S. Army Corp for their investigation and interpretation of the data collected as the selected alternative addresses the above concerns by moving the residue materials to a more secure permanent facility. This Department will remain committed to continue to review and comment on the final design to be implemented. NCDOH will insist that adequate safeguards be in place regarding waste handling and transportation so as to prevent accidents and unacceptable exposures to ionizing radiation during the course of the removal action.

Sincerely,

[redacted]
Director of Environmental Health

Cc: [redacted], Director of NCDOH
[redacted], President of Niagara County Board of Health

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JAN 27 2016

[redacted]
Lieutenant Colonel
District Commander
Buffalo District
U. S. Army Corps of Engineers
1776 Niagara Street
Buffalo, New York 14207

Dear Lt. [redacted]:

The U.S. Environmental Protection Agency has reviewed the U.S. Army Corps of Engineers Feasibility Study and Proposed Plan, Interim Waste Containment Structure (IWCS) Operable Unit, Niagara Falls Storage Site. The EPA concurs on the Proposed Option, Alternative 4, which is excavation, treatment and off-site disposal of the entire contents of the IWCS. The EPA is pleased with the preferred alternative and note that the Proposed Plan cited our guidance on the need for off-site disposal at an appropriate facility for the high activity residues and wastes contained in the ICWS.

We understand that the Corps will need to secure additional multi-year funding to complete this project and so construction will not begin for a number of years. The proposed alternative includes a significant amount of truck traffic as well as other potential environmental impacts at the local level. At the appropriate time in your contracting process, the EPA would be happy to consult with your office on current recommendations for environmentally sustainable technologies in project design, construction and operation.

Thank you for the opportunity to comment and thank you for your continued work in helping to improve the environment in the Buffalo area. If you have any questions regarding our comments, please contact Ariel Iglesias, Acting Director of the Clean Air and Sustainability Division at (212) 627-3315 or [redacted]@epa.gov .

Sincerely,

[redacted]
Regional Administrator

NFSS_08.01_0577_a

cc: [redacted], PMP Chief Special Projects Branch

[redacted]
[redacted] Ransomville, N.Y. 14131-[redacted]
[redacted]

Jan. 14, 2016
U.S. Army Corps of Engineers - Buffalo District
Attention: Environmental Project Management Team
1776 Niagara Street, Buffalo, NY 14207

EPM Team:

I attended the public meeting on Jan. 13, 2016 held at the Lewiston Senior Center, in Lewiston, NY in which I mentioned I had done a CANCER STUDY of those I'm either related to, who were my neighbors or whom I went to school at Lewiston Porter with that had or have some form of CANCER.

This (NFSS) site formerly the L.O.O.W. known as the Manhatten Project was placed there back when I was a BABY. I started gathering information of those who lived in that area when my family started getting various CANCERS, as did some of my friends @ from my Lewiston-Porter School were being diagnosed also. Besides my parents & my paternal Gt. Aunts who have since passed on from this illness. As of October 2015 I have now become the 3rd of 5 sisters to have BREAST CANCER, I had my surgery at Roswell Park. I'm on two Cancer Studies there & have submitted a copy of my study to that facility.

I was contacted by a Lee Simonson of Lewiston back in the late 70's when I wrote an article in the Niagara Gazette in regards to this Radioactive Tower & he was trying to compile a CANCER report my name was supposedly added to that list back then due to TYHROID surgery for the two very large TOXIC goiters I had. ROSWELL told me the only way for me to have TOXIC in my system like that was to come in direct contact – which I probably did in my earlier years. I drank the well water on the family farm located at 651 Pletcher Road, & then at the farm on Balmer Road near Lutts. I even bathed in well water, played in the near by creeks, ditches & ice-skated on the pond in the farmers field directly behind the TOWER. I have an article from 1957 which mentions two of my siblings being stuck in a mire muck pond of quick sand a 'possible run off pond' from the TOWER sludge, they sunk up to their waist had to be rescued by firemen & taken to local hospital for exposure, both NOW have CANCER.

I've never heard of any GOVERNMENTAL CANCER STUDY being taken, nor has anyone made contact with me other than this [redacted] of Lewiston.

I attended a local town meeting once to address this but was told I had to PRE-REGISTER to speak, needless to say I never attended from since. I went to this meeting to see IF or WHAT could be done. I was allowed a three (3) minute speech & got MY point across. NOW my concern is "WHAT will happen to the people in that area ONCE this gets dug up & becomes air borne AGAIN" ??? I have been exposed since childhood, same as my family due to where WE lived & the damage to our HEALTH is very prominent.

The Lewiston Porter School District & surrounding areas have grown over the past 70 years, just about every day I hear of a relative, friend, neighbor or resident from Lewiston, Youngstown, Model City, or Porter who has passed away or been diagnosed with some type of a CANCER. Personally I think this area is WORSE than the LOVE CANAL AREA, unlike Love Canal - NONE of us will ever see a DIME for what WE are struggling with.

Regards,

[redacted]

NOTE: CANCER STUDY attached

FAMILY & FRIENDS CANCERS 1899 – 2015
ALL lived in the LEWISTON - PORTER SCHOOL DISTRICT
& these areas
Lewiston–Youngstown–Model City–Ransomville-the area of the TOXIC Radioactive Tower

Started/age	[redacted]	NAME/location	DOB	DOD/from *	TYPE of CANCER
1946/ 62ys			[redacted]/1884	[redacted]1946 *	LIVER CANCER
1953/82ys			[redacted]/1870	[redacted]/1953*	ABDOMINAL CANCER
1956/2ys			1954 @ Buf Hsp		SKIN Cancer (now free)
1957/16ys			1941 Mt View TB HS		TUBERCULOSIS TB
1970/53ys			[redacted]/1917	[redacted]/1970 *	COLON CANCER
1972/66ys			[redacted]/1906	[redacted]/1972 *	LUNG CANCER
1974/75ys			[redacted]/1898	[redacted]/1974 *	COLON CANCER
1974/33ys			1941	00000000	OVARION CANCER
1974/10ys			[redacted]/1963	[redacted]/1976 *	Malignant BRAIN Tumor
1977/11ys			00/00/1966	[redacted]/1977 *	Malignant BRAIN Tumor
1980/60ys			[redacted]/1920	[redacted]/1981 *	Breast/Stomach/Colon CA
1981/48ys			1934		LYMPHOMA
1983/65ys			[redacted]/1917	[redacted]/1983 *	Lung/Bone/Prostate CA
1983/40ys			1943		R/Mastectomy L/Lump'
1983					BREAST
1985					Ducular BREAST
1984/66ys			[redacted]1917	[redacted]/1986 *	Non-Hodkin Lymphoma CA
1989/31ys			1958		UTERINE & LYMPHOMA
1990/60ys			[redacted]/1930	[redacted]/1991 *	CANCER
1991/43ys			[redacted]/1948	[redacted]/2015	OVARION & BREAST
1991/86ys			[redacted]1905	[redacted]/1991 *	OVARION CANCER
1992/64ys			[redacted]1928	[redacted]/1992	BOWEL CANCER
1990/43ys			1949 ROSWELL		'92 COLON & '94 LIVER
1994/45ys			1949		THYROID CANCER
1994/53ys			1941		SKIN CANCER
1994/70ys			[redacted]1923	[redacted]/1994	had ???????
1994/55ys			[redacted]/1930	[redacted]/1994 *	LIVER CANCER
1994/3ys			[redacted]1990	[redacted]/1996 *	RARE THROAT MUSCLE
1997/53ys			1944		Stg 4 Double Mastectomy
2000/40ys			1960 returned 2016		BREAST & LYMPHOMA
2000/63ys			1937		SKIN CANCER
2001/72ys			[redacted]1929	[redacted]2001 *	PROSTATE CANCER
2002/77ys			[redacted]1925	[redacted]/2013	COLON CANCER
2003/62ys			[redacted]/1941	[redacted]/2003	BREAST CANCER
2003/59ys			[redacted]1942	[redacted]/2003 *	LUNG CANCER
2003/55ys			[redacted]/1948	[redacted]/2003 *	Esophageal CANCER
2003/94ys			[redacted]/1909	[redacted]/2003 *	BREAST CANCER
2004/77ys			[redacted]1926	[redacted]/2004	Prostate CANCER
2004/43ys			[redacted]1961	[redacted]/2004 *	OVARION CANCER
2004/62ys			[redacted]1942	[redacted]/2004	had THROAT CANCER
2006/64ys			[redacted]/1942	[redacted]/2006 *	BONE CANCER
2005/70ys			[redacted]/1935	[redacted]/2007 *	LUNG CANCER
2009/68ys			[redacted]/1940	[redacted]/2009 *	BLADDER CANCER
2009/56ys			[redacted]/1953	[redacted]/2009 *	BREAST CANCER
2010/68ys			1941		Radical RT BREAST
2011/39ys			[redacted]/1972	[redacted]/2011 *	OVARION CANCER
2011/91ys			[redacted]/1920	[redacted]/2011 *	COLON CANCER
2011/46ys			1965 ROSWELL		Skin/MELANOMA
2011/48ys			1960 ROSWELL		Both/BREAST CANCER
2011/71ys			[redacted]1940	[redacted]/2012	CANCER per obit
2012/65ys			[redacted]/1947	[redacted]2012 *	unknown CANCER
2012/68ys			1947		THYROID CANCER
2012/71ys			[redacted]/1940	[redacted]/2013 *	Malignant BRAIN Tumor
2013/94ys			[redacted]/1919	[redacted]2014	unknown CANCER
2014/56ys			[redacted]1958	[redacted]/2014 *	COLON CANCER
2014/72ys			[redacted]/1941	[redacted]/2015 *	BONE CA (had BREAST)
2015/62ys			[redacted]/1953	[redacted]/2015 *	LUNG CANCER
2014/62ys			********		Folicular Lymphoma CA
2014/49ys			1965		COLON & LIVER
2015/62ys			1953 ROSWELL		THYROID CANCER
2015/65ys			1949		THYROID CANCER
2015/68ys			1946 ROSWELL		Left BREAST CANCER
2015/Aug'					COLON CANCER
2015/73ys			1941 ROSWELL		Invasive Mammary Carcinoma (L)
2015/37ys			1978		LUPUS
2016/Jan 56ys			1960 2nd time		Metastasics CANCER/Breast

67 people & growing - 35 related & 32 are Non-relatives - 10 treated @ Roswell - 2 @ Children's

MC or Model C = Model City Rd LP=Lew-Port Sch CA=Cancer B=Benign L =Left R=Right

Compiled by: [redacted] 2014-2015

[redacted]

Subject: [EXTERNAL] Proposed Plan for Waste Control
Date: Sunday, January 31, 2016 7:15:32 PM

Hello, I am emailing in regards to he four proposed plans for the radioactive waste in the Niagara-Lewiston area. I am voting for plan number 4 - a full excavation of waste. We need to take action and prepare a better future for other generations to enjoy. Thank you for your time.

[redacted]

Subject: [EXTERNAL] NFSS
Date: Sunday, February 07, 2016 10:09:31 PM

I support the proposed alternative #4 to remove all of the IWCS contents at the Niagara Falls Storage Site and ship them offsite, and as soon as possible.

Thank you.

Sincerely,

[redacted]
Lewiston, NY

Sent from my Sprint Samsung Galaxy S® 6.

[redacted]

Subject: [EXTERNAL]
Date: Sunday, February 07, 2016 5:52:20 PM

I support the proposed alternative #4 tom remove all the IWCS contents at the NFSS and ship them offsite and as soon as possible.

Sincerely,

[redacted], Vice Chair, Niagara County Legislature

Sent from Windows Mail

[redacted]

Subject: [EXTERNAL] IWCS
Date: Sunday, February 07, 2016 3:49:49 PM

Army Corps,

I support the proposed alternative #4 to remove all of the IWCS contents at Niagara Falls Storage Site and ship them off site, and as soon as possible.

Thank you,

[redacted]
Youngstown, NY 14174

Sent from my iPad

[redacted]

Subject: [EXTERNAL] Niagara Falls Storage Site - IWCS
Date: Saturday, February 06, 2016 11:19:37 PM

Dear Army Corps of Engineers,

I support the proposed alternative #4 to remove all of the IWCS contents at the Niagara Falls Storage Site and ship them offsite as soon as possible.

Thank you.

Sincerely,

[redacted]

[redacted]
Lewiston, NY [redacted]

[redacted]

Subject: [EXTERNAL] Revised Comments on NFSS IWCS FS
Date: Saturday, February 06, 2016 6:13:08 PM
Attachments: NFSS-IWCS-FS-AWbComments.pdf

Please replace the comments sent earlier today (below) with the attached comments, instead, which correct my typo on the micrograms-per-liter abbreviation.

Thank you.

[redacted]

[redacted]
Sent: Saturday, February 6, 2016 3:49 PM
To: 'fusrap@usace.army.mil' <fusrap@usace.army.mil>
[redacted]
Subject: Comments on NFSS IWCS FS

Please accept the attached public comment addressed to the Corps regarding the IWCS FS.

Thank you.

[redacted]
Lewiston, NY

[redacted]
[redacted].
Lewiston, NY 14092

February 6, 2016

U.S. Army Corps of Engineers Buffalo District
Environmental Project Mngt. Team
1776 Niagara St.
Buffalo, NY 14207 via email: fusrap@usace.army.mil and by U.S. Mail

RE: **Feasibility Study (FS) for the Interim Waste Containment Structure (IWCS) at the Niagara Falls Storage Site (NFSS,) and, the Proposed Plan for the IWCS**

Dear Environmental Project Management Team Members,

I write in support of proposed Alternative #4 to remove all of the contents of the IWCS, but note concerns about the delayed timetable, and, the stability of the IWCS prior to removal of its contents.

1. Cost: The Corps' public representation of its discounted cash flow analysis did not represent the true cost of the four action Alternatives.[1] In actual 2012 dollars, the Corps' Preferred Alternative #4 is by far the least expensive per FS Appendix J, Table J-2 figures in the chart, below.

   Moreover, the discounted cash flow for Alternatives 2, 3A and 3B assume the IWCS Cap would be reconstructed only once in 1,000 years. Notwithstanding the fact that the half-life of K-65, et al is greater than 1,000 years, the "Re-Cap*" line I added to the Corps' discount, below, assumes the Cap must be reconstructed once every 100 years, which seems quite conservative:

   in $ millions

Alternative #2 re-cap units A, B, C	**Alternative #3a** remove A, re-cap B/C	**Alternative #3b** remove A/B re-cap C	**PREFERRED Alternative #4** remove ALL: A/B/C
Corps: Non-Discount			
$1.473 billion	**$1.71 billion**	**$1.77 billion**	**$490.6 million**
Corps: Discount 3.5%			
$ 67.4 million	$303.6 million	$362.4 million	$490.6 million
Re-Cap*+discount 3.5%			
$301.4 million	**$537.6 million**	**$596.4 million**	**$490.6 million**

* =10x the $23.4 million the Corps projected Capital cost of Alt. 2 (Att.J-1-5 of FS Appendix J)+ Corps Discounted figures

As noted in the FS, Alternative #2 to leave the high activity residues in place would violate regulation.

[1] The following Appendices could not be downloaded from the FS Report on the USACE website; they were available only in hard copy at the Lewiston Library, which precluded a complete public review of all 20,000 pages in the 60-day comment period timeframe over Christmas and New Years' holidays: Appendices D, E, H, I, J, K.

2. Location: The Proposed Plan makes no mention of the close proximity of *all Lewiston-Porter Central School District schools* to the IWCS, other than their location on a map in the back of the document. The Proposed Plan also does not include a map of all residences within 10 miles of the IWCS.

3. Leakage: The Corps has provided no soil or sediment data to support its vague claim that the dramatic increase of Uranium detections in certain groundwater wells, from 60 ug/L to over 4,000 ug/L during the past several years around the IWCS is due to legacy contamination. The only scientifically rational explanation provided, to date, is that the IWCS is already leaking.

   - The failure of the Corps to publish its 2014 Environmental Surveillance Report as of this date, along with data from its missing Appendix K in its otherwise published *Feb. 2015 Balance of [NFSS] Plant Extent* investigation report suggest the Corps knows the IWCS is already leaking.

   - Given the complexity of vertical and horizontal groundwater flow around the NFSS, the Corps should increase the locations and frequency of surface water sampling, particularly in the Southwest Drainage Ditch near the NFSS which turns west and then north through Lew-Port Central School District property. The Corps would not need to admit the IWCS is already leaking in order to address public concerns about the adequacy of monitoring around the NFSS.

   - Equally important, the failure of Corps contractors to identify the source of the increasing Uranium in groundwater in any of the investigations published, to date, render **FS Alternatives 2, 3A and 3B as too dangerous in the short, or long, or intermediate term to be considered.**

4. Failure Analysis: The FS places undue reliance on a 1994 Dept. of Energy Failure Analysis to justify the proposed delay in removing IWCS contents. THE IWCS HAS NO ENGINEERED, DESIGNED STRUCTURE FOR RADIOACTIVE MATERIAL IN THE BOTTOM OR BENEATH IT.

   The high water table and complex geology at and around the IWCS and NFSS present severe regulatory obstacles to Alternatives 2, 3A and 3B as noted in the FS, and for good reason.

   a) The Corps has not indicated that it has a plan to address an emergency involving a major failure of the cap; for example, the collapse of the south wall of the cell leaving a gaping opening in the IWCS cap. Only relatively smaller breaches seem to have been contemplated in Corps analyses, to date. It is recommended the Corps accelerate its timetable for IWCS removal for this reason.

b) In addition to shortcomings in the Failure analysis for the IWCS cap, no reasonable analysis of the integrity of the bottom of the IWCS has been conducted. Floor drains and wall breaches in the bottom of the containment structure, a WWII-era basement, were patched up in the early 1980's prior to placement of the high activity residues and radioactively contaminated soils and debris in the IWCS. Patches in cement tend to breakdown over time, and more so for patches installed over 30 years ago.

The following statement in the Proposed Plan, p.17, is wholly unsubstantiated: *"Despite the fact that more IWCS material is removed under Alternative 4, the long-term effectiveness and permanence of Alternatives 3A, 3B, and 4 are the same, with only cost increasing as additional material is removed. No improvement in the long-term effectiveness and permanence is realized because the IWCS materials that remain in-place under Alternatives 3A and 3B would be contained in an enhanced IWCS, which would offer the same level of protection as a permitted off-site disposal facility provided by Alternative 4."*

This statement is false because the off-site facility deemed likely to receive material has engineered containment beneath the waste. THE IWCS HAS NO ENGINEERED CONTAINMENT DESIGNED FOR RADIOACTIVE RESIDUES IN THE BOTTOM OF ITS STRUCTURE OR BENEATH IT. This another reason why **FS Alternatives 2, 3A and 3B are too dangerous in the short, or long, or intermediate term to be considered.**

c) The Corps' failure analysis for an airplane accident did not seem to consider frequent flyovers from the Niagara Falls Air Base. This Base has one of the longest airstrips in the U.S. and hosts some of the largest aircraft in the world. In addition, these aircraft are often loaded with fuel and ammunition – from C-130s to, now, KC-135[2] refueling tankers and drones. International military aircraft (from other countries) also use the Base for maintenance of large planes from time to time according to the Base website, presumably due to the unusually long landing strip.

The fact that military aircraft have crashed in our area is another reason why **FS Alternatives 2, 3A and 3B are too dangerous in the short, or long, or intermediate term to be considered.**

[continued next page]

[2] "Schumer: KC-135 refueling planes headed to Falls air base" http://www.niagara-gazette.com/news/local_news/schumer-kc--refueling-planes-headed-to-falls-air-base/article_d693d714-cb56-11e5-aec8-8f134fc9b788.html

"A C-130 from the Niagara Falls Air Reserve Station launches flares over Lake Ontario during a training exercise August 10, 2011, Niagara Falls, NY. Flares can be launched from an aircraft as a defensive measure against hostile forces. (U.S. Air Force photo by Staff Sgt. Joseph McKee)"
http://www.niagara.afrc.af.mil/photos/mediagallery.asp?galleryID=948&page=2

5. Future Meetings: As an aside, the Corps did not seem to effectively communicate or highlight for the public the relative volume of high activity residues to be transported. For example, the 28,000 cu. yd. estimate of residues in IWCS Unit A is the equivalent of about *one week's* worth of waste hauled *in* to Lewiston and Porter during most of the year.

   (Total wastes shipped to Modern and CWM were roughly 1.25 million tons in a given year, with seasonally low volumes in Jan. and Feb. Our Villages, the Town and the County are working to permanently reduce this volume with the closure of CWM, however, this figure puts the IWCS volume into some context residents have experienced and therefore may better understand.)

   It is also recommended the Corps hold future public meetings at the Lew-Port High School Auditorium to accommodate a larger audience likely to be interested in the project plan details for transportation and environmental monitoring.

   Sincerely,

[redacted]

[redacted]

Subject: [EXTERNAL] RE: Comments on the Final FS Report and Proposed Plan for the IWCS OU of the NFSS
Date: Saturday, February 06, 2016 3:28:08 PM
Attachments: Comments on the Final FS and Proposed Plan for the IWCSa.doc
AR Comments on FS, Plan for IWCS OU Appendix B.pdf
AR Comments on FS, Plan for IWCS OU Appendix A.pdf

[redacted]

With respect to the FS and Proposed Plan for the IWCS OU, please find comments and appendices attached.

Thank you,

[redacted]

[redacted]

[redacted]

Sheboygan Falls, WI 53085

February 6, 2016

[redacted]

U,S. Army Corps of Engineers, Buffalo District,

FUSRAP,

1776 Niagara Street,

Buffalo, NY 14207

RE: Comments on the Final (R3) Feasibility Study Report and Proposed Plan for the Interim Waste Containment Structure Operable Unit of the Niagara Falls Storage Site (NFSS).

Dear [redacted]

The U.S. Army Corps of Engineers recently released a feasibility study (FS) and proposed plan for the Interim waste Containment Structure Operable Unit of the Niagara Falls Storage Site (NFSS), Lewiston, New York. The proposed plan documents the Corps' preferred alternative, Alternative 4, which is to excavate, partially treat and dispose of the entire contents of the NFSS Interim Waste Containment Structure (IWCS) off site. I fully support this alternative, which will result in complete removal of IWCS wastes from the NFSS. However, I am concerned that the IWCS, contrary to the finding in the FS, is already showing signs of failure and would hope that the proposed plan is approved, funded and executed in a timely fashion. It would be most helpful if the Corps would address my concerns by answering the questions documented in my letter.

The concern over IWCS failure stems from recent and ongoing detections of highly elevated levels of uranium in selective groundwater monitoring wells south and east of the IWCS. In 1978, prior to construction of the IWCS, the Department of Energy (DOE) established an Environmental Surveillance Program (ESP). The ESP assessed radon emissions from the NFSS and the potential for migration of radiological contaminants to surface water, sediment and groundwater. Performance monitoring of the IWCS was later added to the ESP.

Groundwater monitoring around the IWCS is an essential part of the current ESP. The IWCS is designed to retard radon emissions and minimize both, infiltration from precipitation and migration of contamination to groundwater. The analysis of groundwater for radiological contaminants (uranium included) serves as a check for IWCS leakage. Detections of increasing

levels of uranium in groundwater around the IWCS indicate that the IWCS is no longer preventing migration of contamination to groundwater.

Review of recent ESP reports show the levels of uranium in groundwater south and east of the IWCS appear to be still increasing, suggesting the presence of a significant uranium source. The only such significant source that I am aware of is the IWCS contents.

Historical ESP detections of uranium in groundwater were comparatively low around the IWCS, as illustrated by the attached Fig. 1-8, (Attachment A), taken from Bechtel, *"Failure Analysis Report for the Niagara Falls Storage Site, Lewiston, N.Y.,*" December 1994. which is referenced in the IWCS feasibility study. Fig. 1-8 shows the Environmental Surveillance Program (ESP) detections of total uranium in groundwater for successive years 1985 through 1994. During this period, the highest detection of total uranium in groundwater was 78 pCi/L (this equates to less than 100ug/L).

In December 2007 and April 2011, the Buffalo District Corps of Engineers issued the Remedial Investigation Report (RIR) for the NFSS and NFSS Remedial Investigation Report Addendum respectively, which defined the nature and extent of contaminants on the NFSS and assessed the potential long-term risks associated with the contaminants. A key public concern arising out of the RIR, was the detection of highly elevated uranium (of the order of 1,000 ug/L) south and east of the IWCS: did the atypical levels of uranium in groundwater signify leakage from the IWCS? Since that time, successive years of groundwater monitoring have largely shown an upward trend in uranium in monitoring well OW-11B, east of the IWCS. The addition of several other investigative monitoring wells to the ESP in 2012 has provided more data on the uranium contamination.

1) **Why does the December 2015 Feasibility Study (FS) for the IWCS analyze 2011 groundwater monitoring data from the Environmental Surveillance Program (ESP) and not the most recent published groundwater data from 2013?**

According to the 2013 ESP Memorandum,

"The most elevated total uranium concentrations if groundwater were detected in wells installed in late 2012. The majority of these wells were placed east and south of the IWCS to investigate known areas of groundwater contamination and they exhibited significantly elevated total uranium concentrations. The source of the uranium in wells south of the IWCS is believed to be former storage piles and possibly residual contamination in and around former building 409.The source of uranium in wells east of the IWCS is believed to be residual soil contamination from former operations in this area, which included a railway bed, storage piles, and a decontamination pad used during construction of the IWCS. In addition residual contamination in the sanitary sewer near manhole 6, which was removed in 2013 as part of field

investigation activities may have contributed to groundwater contamination in this area. The USACE continues to investigate the source of this groundwater contamination and a report of the findings is anticipated by the end of 2014."

2) **Has residual soil contamination been found to be the source of the uranium groundwater contamination east of the IWCS? If not, what explanation is there for the continued increase in uranium in groundwater, other than IWCS leakage?**

In looking at the 2013 groundwater analytical results from investigative wells installed in 2012, it appears that the uranium levels in some wells increased dramatically within a year:

South of the IWCS, the level of total uranium in well MW 951 increased from 2,090ug/L in 2012 to 4,631 ug/L in 2013.

East of the IWCS, the level of total uranium in well MW953 increased from 1,970 ug/L in 2012 to 4,843 ug/L in 2013.

Clearly in 2012 and 2013 a significant source of uranium was affecting both well MW 951 and well 953. Historical records show past storage of radioactive wastes and remediation activities could account for the presence of uranium contamination south and east of the IWCS but that contamination would have to be still present for uranium levels to increase. The soil sampling conducted in the course of the NFSS RI found very low levels of uranium.

3) **When will the Corps release the results of the 2014 Environmental Surveillance Program?** The 2013 results were released in September 2014, so that it has been almost 18 months since the public received information concerning the levels of uranium in groundwater around the IWCS.

4) **Does the 2014 ESP show further increases in the levels of uranium in wells MW 951 or MW 953?**

5) **Does the Corps have additional information regarding the levels of uranium contamination in water within the area now designated as the IWCS ?**

The IWCS was constructed from 1982 to 1986 around a former fresh water treatment plant and serves to contain the consolidated radiological contamination, generated by the Manhattan Engineer District and its successor, the Atomic Energy Commission. In 2011, as part of the RI Addendum, the Corps of Engineers published a 1978 report (Attachment B) which investigated potential sources of water found to be accumulating in and covering the highly radioactive residues then being stored in Buildings 410 and 411 at the Niagara Storage Site. These buildings still contain radioactive residues and now constitute the IWCS. The report records the

observation of groundwater accumulating within the residue storage buildings. At that time, only the L-30 residues were stored in Building 411. L-30 residues contain more uranium than any other residues stored at NFSS. Analysis of the water in contact with the residues in Building 411 showed levels of uranium to be 90,000 ug/L and 100,000 ug/L in the respective sections, and around 8,000 ug/kL in groundwater contained in Building 410, which was at that time free of residues. Both areas are now contained in the IWCS: Building 411 is designated part of Subunit A and the debris filled foundation of demolished Building 410 forms part of Subunit B.

6) **What is the current view of the Corps with respect to migration of groundwater contamination along subsurface utility lines on the NFSS?**

Sincerely,

[redacted]

MWB 11/21

NOV 17 14 48

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158 — CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

NOV 17 1978

[redacted], Director
Manufacturing Division
Department of Energy
Oak Ridge Operations
P. O. Box E
Oak Ridge, Tennessee 37830

Dear [redacted]:

NIAGARA FALLS SITE

Reference: Letter, [redacted], "Radon And Associated Monitoring," 10/10/78

As requested in the reference letter, NLO has investigated sources of water in Buildings 410 and 411 at the Niagara Falls site, the degrees of contamination present in the waters, flow between buildings, and other liquid effluent problems at the site that may affect onsite and offsite radiological contamination from radioactive materials stored at the site.

The attached Trip Report presents data and conclusions relative to the above points. If there are any questions please contact us.

Sincerely yours,

Original Signed By

[redacted]

Manager

[redacted]
Manager

APP:wfk

Att.

cc: [redacted]

November 16, 1978

TRIP REPORT ON INSPECTION OF OLD WATER TREATMENT FACILITY AT LOOM ON OCTOBER 12-15, 1978

[redacted]

[redacted]

OBJECTIVE OF TRIP:

To inspect the old water treatment facility which is and/or has been used for the storage of contaminated residues in order to determine the source of water in the buildings and to obtain water samples at this facility to determine if the water in these buildings is contaminated and the degree of contamination. See attachment for a facilities plan which depicts water sampling points and analyses of water samples.

BACKGROUND FOR TRIP:

[redacted], in his letter "Radon and Associated Monitoring" dated October 10, 1978 to S. F. Audia, requested in addition to radon monitoring that:

1. Water in Building 410 be monitored for uranium and radium content.

2. Determine source of water in Buildings 410 and 411.

3. Determine if water is being lost to the environment from these buildings, and if so, can the water be contained?

PERSONS VISITED:

[redacted] National Lead Company of Ohio

DISCUSSION:

A visual inspection of the facilities and drawings was made to determine the source of the water which is in the buildings and that which is flowing into Building 410.

[redacted]

November 16, 1978

As for water in Building 410, some of it enters through roof openings in Buildings 410 and 415. The water flowing into Building 410 through pipes which penetrate the foundation wall where sample #6 was taken is apparently ground water. The ground water level is high because surface drainage is nil between Buildings 410 and 411 and around the reservoir (Building 411). There appears to be a pipe running between the west chamber of the Recarbonation Basin where sample #3A was taken and Building 415 where sample #4 was taken. This pipe had been sealed but portions of the pipe seal have corroded. The analyses of samples 3A and 4 indicate that there is no significant flow if any at all from the Recarbonation Basin to Building 415.

As for the source of water in the recarbonation basin, it can only be direct rainfall with possibly some run-off from the reservoir roof which is flowing behind the gutter which was originally installed to prevent this run-off from entering the recarbonation basin. The water level in this basin, the east chamber of this basin and the trough in Building 411 extending from the recarbonation basin to the north-south divider wall in Building 411 is above ground level (top of embankment around Building 411). The water in the west chamber of the Recarbonation Basin where sample 3A was taken was approximately 12 feet lower than the level in the basin. Water in the west half of the reservoir (Building 411) is about 2 feet below that in the basin and the trough. Water in the east half of the reservoir is approximately 15 feet below the water level in the west half.

In relationship to the surrounding area ground level at the bottom of the embankment around Building 411, water in the west half is approximately seven feet above this ground level and about eight feet below this ground level in the east half.

The source of water in the reservoir is difficult to determine. There are signs of some roof leakage but this leakage would not produce the amount of water that does exist. The water in the trough apparently comes from the recarbonation basin. There were openings in each end of this trough which have been sealed.

Rain which falls on the reservoir roof flows over the east and west edges of the roof and drops into open troughs which are laid on the ground. These troughs are apparently connected to a drainage system which discharges into the central drainage ditch. Water no longer flows in these troughs which are clogged

with earth and vegetation. As a result the troughs overflow onto the ground. This water is trapped around the reservoir since ground elevation at the reservoir perimeter fence (which is approximately ten feet from the reservoir) is about one foot higher than the ground elevation at the reservoir. This water could enter the reservoir if there were cracks or penetrations in the 24 inch thick reservoir wall. From visual observation of the interior of the east half on October 13, 1978 after a substantial rainfall, it would appear that this source is doubtful.

Water at Buildings 410, 411, 415 and the recarbonation basin escapes to the environment primarily through evaporation. As for Building 410, water apparently flows through wall penetrations after heavy rainfalls to the central drainage ditch. The analyses of water samples 4, 5 and 6 taken at Building 410 indicate that the degree of contamination is insignificant.

CONCLUSIONS:

1. The contamination in the water in various areas of Building 410 is minimaland indicates the source of the water is ground water and rain water.

2. There are no indications of flow of water between the various buildings, with the exception of seepage communication between the recarbonation basin and a trough along the south wall in Building 411.

3. The source of water in the recarbonation basin is direct rainfall plus possibly some run-off from the Building 411 roof.

4. The source of water in Building 411 cannot be stated with certainty. Roof leakage is a contributor but in no way can produce the quantity of water present. Additional investigations are underway to determine possible contributions from roof drainage onto the adjacent ground entering the building.

5. Water from Building 410 apparently escapes to the central drainage ditch through wall penetrations after heavy rainfall. There are no signs of water escape from Building 411. Since the water in Building 410 is concluded to be ground water the existing ground water sampling system appears to be adequate control.

[redacted]

November 16, 1978

RECOMMENDATIONS:

In regard to possible leakage to the environment via the ground water, the current quarterly sampling program at test wells around the water treatment facility and the central drainage ditch provides adequate surveillance.

COMMITMENTS:

None.

[redacted]

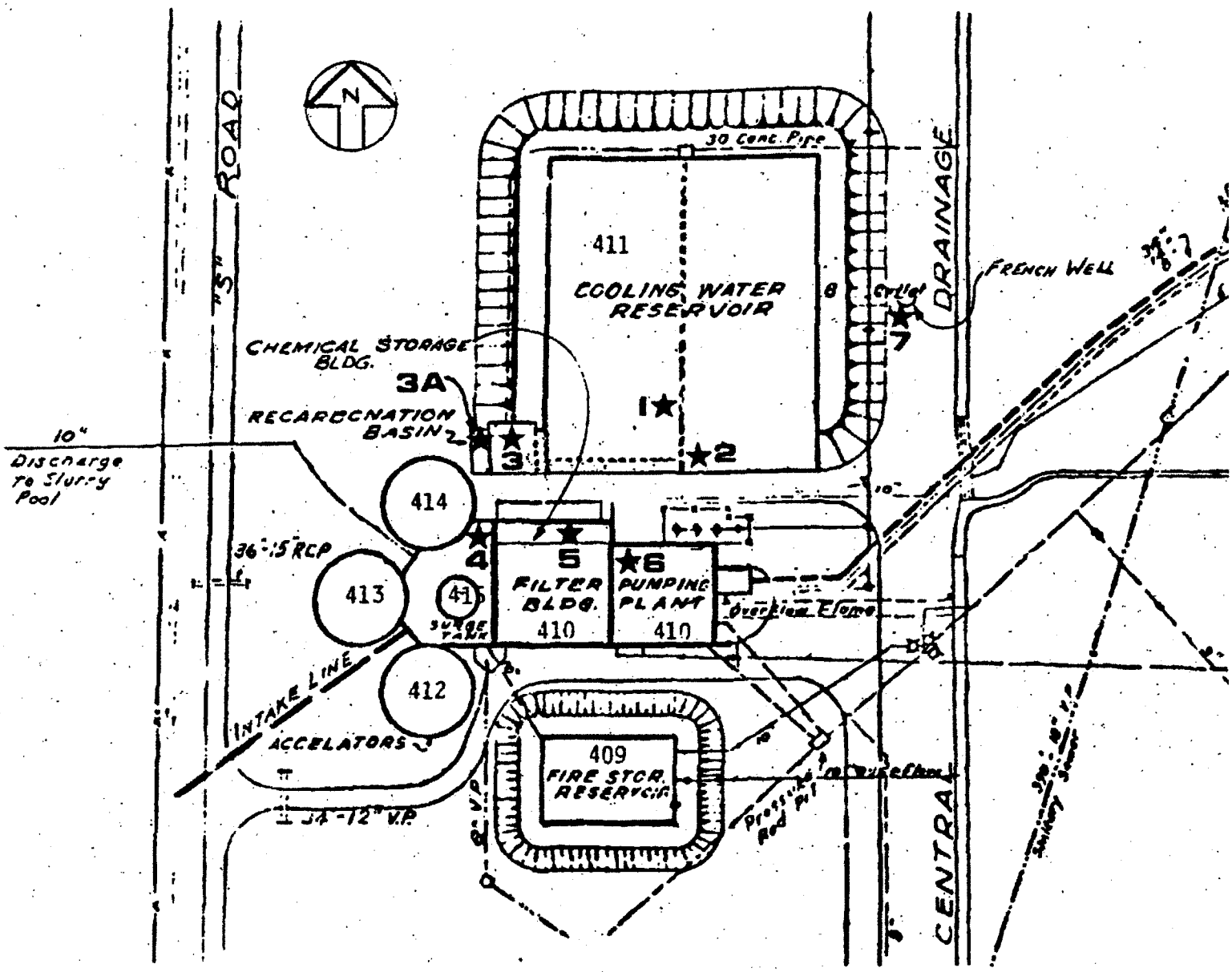
EAH:wfk

Att.

[redacted]

Central Files

Attachment



ANALYSES OF WATER SAMPLES					
Sample No.	Date Collected	pH	Uranium ppm	Radium-226 d/m/ml	
1	10/12/78	9.8	90	1.5	
2	"	9.8	100	1.5	
3	"	8.0	0.4	5.0	
3A	"	9.0	6.8	0.26	
4	10/13/78	7.9	1.3	0.041	
5	"	8.0	1.4	0.043	
6	"	8.2	1.6	0.067	
7	"	7.2	0.8	0.007	

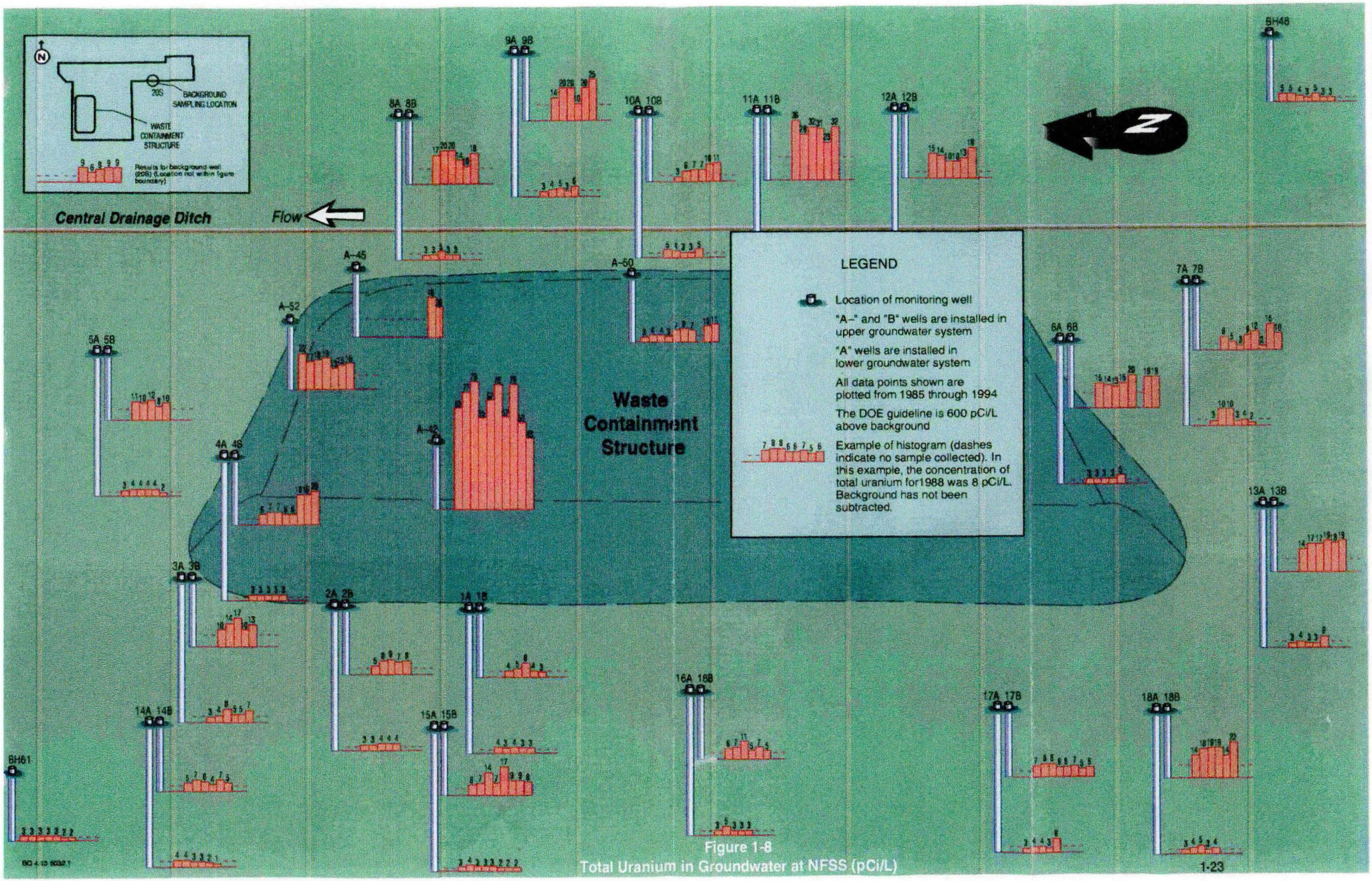


Figure 1-8
Total Uranium in Groundwater at NFSS (pCi/L)

[redacted]

Subject: [EXTERNAL] IWCS Operable Unit
Date: Saturday, February 06, 2016 2:44:26 PM

Dear Sirs:

We are relieved and overjoyed that, after review, the US Army Corps of Engineers has concluded that Alternative 4 is cost effective, protective of human health and the environment and is their preferred method of addressing the materials contained in the Interim Waste Containment Structure (IWCS) Operable Unit at the NFSS in Lewiston, New York.

We believe Alternative 4 to be the fairest, most effective, and most permanent proposal offered and welcome the opportunity for our community to move forward past this toxic legacy.

Sincerely,

[redacted]

From: [redacted]
To:
Subject: [EXTERNAL] Alternative #4
Date: Saturday, February 06, 2016 10:09:58 AM

Attention: Army Corps of Engineers

As a resident of Lewiston for over 34 years and with serious concerns about the hazardous waste and radioactive waste deposited in our community, I am communicating support for Alternative #4 to remove all radioactive materials from the Niagara Falls Storage Facility to gain the level of protection that this community deserves.

Alternative #4 not only removes the health and well being hazards to the area, but it serves to allow the town to move forward on economic development projects that have significant benefits to Niagara County. Historically, the region has suffered under a cloud of contamination that has had deleterious effects on growth and employment prospects for our residents. Currently, Western New York has made some progress to improve the economy in the region. Moving forward to eliminate the hazards in our community will facilitate enhancing the area's image while protecting the health of the citizenry.

Thank you for considering these comments.

[redacted]

--
Blockedwww.Globe-Lynx.com
*International Business Development
*Technology Transfer Services

From: [redacted]
To: [redacted]
Subject: [EXTERNAL] NFSS
Date: Saturday, February 06, 2016 9:39:23 AM

To Whom it May Concern:

I support the proposed alternative #4 to remove all of the IWCS contents at the Niagara Falls Storage Site and ship them offsite, and as soon as possible.

Thank you.

Sincerely,

[redacted]
Youngstown, NY 14174

From: [redacted]
To:

Subject: [EXTERNAL] Comments on NFSS IWCS OU from LOOW CAC
Date: Friday, February 05, 2016 5:47:23 PM
Attachments: 2-5 LOOW CAC response.pdf

Dear [redacted]

Attached is a letter from LOOW CAC om response to the public comment period.

Sincerely,

[redacted]

Co Chair, Lake Ontario Ordnance Works Community Action Council

Director, Interdisciplinary Science and Engineering Partnership (ISEP) with Buffalo Public Schools

Blockedhttp://isep.buffalo.edu
Blockedhttp://isep.mspnet.org

LOOW Community Action Council

February 6, 2016

U.S. Army Corps of Engineers, Buffalo District
Attention: Environmental Project Management Team
1776 Niagara Street Buffalo, NY 14207

Dear Lt. Col. [redacted] and Staff:

The Lake Ontario Ordinance Works (LOOW) Community Action Council (CAC) provides the following input on the Niagara Falls Storage Site (NFSS) Interim Waste Containment Structure (IWCS) Operable Unit Feasibility Study and Proposed Plan, and the future of the NFSS site.

The LOOW CAC fully Support the Proposed Remedy
We, as a community, would like to thank the Corps for identifying the full removal of materials from the IWCS as the best solution for this operable unit. The CAC members have participated in each of many community/USACE organizations that have provided local community input and regional scientific expertise in monitoring the LOOW site for decades. The community and the CAC have long held that storage of these highly radioactive materials has no place in this community, especially in such close proximity to homes, schools, and valuable water resources, especially the Great Lakes, source of most of the fresh water on the planet.

The LOOW CAC Would Like to See a Strong Focus on Funding and Emphasis on a Timely Cleanup
We recognize that funding is not currently in place for the cleanup to proceed in any reasonable schedule. We strongly encourage the Corps to do everything in its power to request the additional funding necessary to accelerate cleanup of this site. The NFSS cleanup does not fit into the scale and hazard of a typical FUSRAP site. The Corps, the DOE, and the U.S. Congress all need to take a close look at what is necessary to clean up this important site and ensure a safe and timely cleanup. The LOOW CAC intends to continue its efforts with members of Congress and other officials toward obtaining dedicated government funding to address full remediation of the IWCS and NFSS.

The LOOW CAC Would Like to See Continued Support for Community Involvement
In recent years, the relationship between the community and the Corps has strengthened considerably, and we believe that meaningful community involvement has been an important force in getting to such a positive remedy. We look to the Corps in continuing its strong support for community involvement as we move into the important final phases of decision-making, design, and ultimately the cleanup.

We would like to continue to have access to an appropriate level of facilitation support for LOOW CAC and community meetings, resources to allow us to maintain the LOOW CAC web site and Facebook page, for a continued Administrative Record File in area libraries, and regular and accessible communication about progress and technical decisions moving forward. There are many elements of the design that will be important for the community to understand and provide input.

We would very much appreciate a conversation with Corp leadership as soon as possible as we understand that the current contract in support of facilitation, with Mr. Doug Sarno, expires at the end of March.

We look forward to continuing our constructive relationship with the Corps as this important work progresses.

[redacted]

Co-Chair
LOOW Community Action Council

[redacted] LOOW CAC Executive Committee Member
[redacted] LOOW CAC Executive Committee Member

From: [redacted]
To:
Subject: contents at the Niagara Falls Storage Site
Date: Friday, February 05, 2016 5:06:52 PM

)2/05/2016

I support the proposed alternative #4 to remove all of the IWCS contents at the Niagara Falls Storage Site and ship them offsite, and as soon as possible.

Thank you.

Sincerely

[redacted]

Edina MN 55436

HAUDENOSAUNEE
TUSCARORA NATION
2006 MT. HOPE ROAD — VIA: LEWISTON, NEW YORK 14092

February 4, 2016

U.S. Army Corps of Engineers
Buffalo District
Attn: Environmental Project
Management Team
1776 Niagara Street
Buffalo, NY 14207

To Whom It May Concern:

The Tuscarora Nation wish to thank you for taking the right steps to put all the peoples minds at ease selectingAlternative 4 as the Proposed Plan for the NFSS .

The Tuscarora Nation wish to inform you that the Nation will not allow any of the material to cross the Tuscarora Nation Territory to reach its final detination. The Tuscarora Nation wishes to be informed of every step of the project from start to finish.

Thank you for your cooperation in this important matter.

ONEH!

[redacted]

Tuscarora Nation

From: [redacted]
To:
Subject: [EXTERNAL] Niagara County Cleanup
Date: Friday, February 05, 2016 2:50:28 PM

I support the proposed alternative #4 to remove all of the IWCS contents at the Niagara Falls Storage Site and ship them offsite, and as soon as possible.

Thank you.

Sincerely,

[redacted]
Youngstown, NY 14174

From: [redacted]
To:
Subject: [EXTERNAL] Public Comment - Interim Waste Containment Storage cell at the Niagara Falls Storage Site
Date: Friday, February 05, 2016 12:01:10 PM

To Whom It May Concern:

I support the proposed alternative #4 to remove all of the IWCS contents at the Niagara Falls Storage Site and ship them offsite, and as soon as possible.

Sincerely,

[redacted]
Youngstown, NY 14174

From: [redacted]
To:
Subject: [EXTERNAL] Loow
Date: Friday, February 05, 2016 1:08:16 PM

Thank you, good choice,good job [redacted]

From: [redacted]
To:
Subject: [EXTERNAL] Niagara Falls Storage Site
Date: Friday, February 05, 2016 1:23:19 PM

I support the proposed alternative #4 to remove all of the IWCS contents at the Niagara Falls Storage Site and ship them offsite, and as soon as possible.

Thank you.

Sincerely,

[redacted]
Ransomville, NY 14131

From: [redacted]
To:
Subject: [EXTERNAL] IWCS
Date: Friday, February 05, 2016 1:53:02 PM

Army Corps:

I support the proposed Alternative # 4, to remove ALL of the IWCS contents at the Niagara Falls Storage Site and to ship them offsite as soon as possible.

Thank You for accepting my strong request in this public comment period.

Sincerely,

[redacted]

[redacted]

[redacted]

Niagara University, N.Y. 14109

From: [redacted]
To:
Cc:
Subject: [EXTERNAL] NIAGARA FALLS STORAGE SITE
Date: Friday, February 05, 2016 1:55:21 PM

I support the proposed alternative #4 to remove all of the IWCS contents at the Niagara Falls Storage Site and ship them offsite, and as soon as possible. I believe that this is critical not only for our community, but for the millions of people that depend on fresh water from Lake Ontario.

Thank you.

[redacted]
Lewiston New York 14092

From: [redacted]
To:
Subject: [EXTERNAL] removal of hazardous waste
Date: Friday, February 05, 2016 1:56:44 PM

May I congratulate and thank the Army Corps of Engineers for advocating option 4, removal of all the hazardous waste from the containment site in Niagara County. This needs to be done as soon as possible. Please press ahead.
[redacted] Youngstown, NY 14174

From: [redacted]
To:
Subject: [EXTERNAL] NF Storage Site
Date: Friday, February 05, 2016 2:17:06 PM

Dear Ones,
I support alternative #4 to remove all of the IWCS contents at the Niagara Falls Storage Site and ship them offsite as soon as possible.

Thank you.
[redacted]
Youngstown, NY

Sent from my iPhone

From: [redacted]
To:
Subject: [EXTERNAL] remove IWCS waste
Date: Friday, February 05, 2016 2:26:11 PM

I support the complete Removal alternative #4 of all IWCS waste .

[redacted]
Ransomville NY. 14131

From: [redacted]
To:
Subject: [EXTERNAL] Town of Lewiston NFSS comments
Date: Thursday, February 04, 2016 10:47:19 AM
Attachments: 20160204103926133.pdf

Hard copy to follow.

[redacted]

The message is ready to be sent with the following file or link attachments:

20160204103926133

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

TOWN OF LEWISTON
1375 Ridge Road
Lewiston, New York 14092
(716) 754-8213
www.townoflewiston.us

Town of Lewiston
RESOLUTION No. 2016 - 4

RESOLVED, that the Town Board of the Town of Lewiston, County of Niagara, State of New York hereby gives its full support of the U.S. Army Corps of Engineers' proposed plan for the Interim Waste Containment Structure (IWCS), Alternative 4 for removal of the entire contents of the interim waste containment storage cells from the Niagara Falls Storage Site (NFSS), as soon as possible, which is located on Pletcher Road in the Town of Lewiston; and

BE IT FURTHER RESOLVED, that copies of said Resolution be sent to U.S. Senators Charles Schumer and Kirsten Gillibrand; Representative Chris Collins; Senator Robert Ortt and Assemblyman John Ceretto.

The Resolution was offered for adoption on January 25, 2016 by Councilman Bax, Seconded by Councilman Geiben, with the vote as follows:.

[redacted]

Aye
Aye
Aye
Aye
Aye

Motion Carried 5 – 0

Town Seal

Please offer your comments, ask any questions, or request more information here. You may fill out this comment card now and leave it in the comment box. If you are commenting on the Interim Waste Containment Structure Operable Unit Proposed Plan, your comments will be responded to in the Record of Decision Responsiveness Summary. Please print legibly. Thank you for participating in this outreach. The Buffalo District Environmental Project Management Team values your input.

Would suggest using existing solid waste route that the land fill uses. Be considerate of Bus Route times Communicate with Lewiston Town officals Have a HAZARD Plan in place with the local Police and fire and county EMO.

Optional Information

Name: [redacted]
Email: [redacted]
Addre[redacted]

Phone [redacted]

Buffalo District
Environmental Project Team
1776 Niagara Street
Buffalo, New York 14207
1.800.833.6390
fusrap@usace.army.mil
http://www.lrb.usace.army.mil/Missions/HTRW/FUSRAP/NiagaraFallsStorageSite.aspx

Please offer your comments, ask any questions, or request more information here. You may fill out this comment card now and leave it in the comment box. If you are commenting on the Interim Waste Containment Structure Operable Unit Proposed Plan, your comments will be responded to in the Record of Decision Responsiveness Summary. Please print legibly. Thank you for participating in this outreach. The Buffalo District Environmental Project Management Team values your input.

I am superintendent of the Lewiston Porter CSD I am concerned about transportation of the materials especially those materials from sub units A and B. One encased in concrete containment vessels it would be in the best interest of the school system to move them east away from the schools to the inter modal transport location.

Optional Information

Name: [redacted]
Email: [redacted]
Addre[redacted]

Phone [redacted]

Buffalo District
Environmental Project Team
1776 Niagara Street
Buffalo, New York 14207
1.800.833.6390
fusrap@usace.army.mil
http://www.lrb.usace.army.mil/Missions/HTRW/FUSRAP/NiagaraFallsStorageSite.aspx

Please offer your comments, ask any questions, or request more information here. You may fill out this comment card now and leave it in the comment box. If you are commenting on the Interim Waste Containment Structure Operable Unit Proposed Plan, your comments will be responded to in the Record of Decision Responsiveness Summary. Please print legibly. Thank you for participating in this outreach. The Buffalo District Environmental Project Management Team values your input.

GRATEFUL YOU ARE APPROVING FULL REMOVAL

PLEASE TRY TO MOVE UP TIMING -- THIS IS URGENT !

BUT IF FUNDING IS A PROBLEM PLEASE DO NOT

COMPROMISE AND ACCEPT A LESS COMPLETE PLAN.

TO BE CONSISTENT IN YOUR GOALS PLEASE ALSO INSIST ON

CLOSING CWM PERMANENTLY. SHOULDN'T WASTE (NUCLEAR)

THERE ALSO BE REMOVED? AT LEAST DO NOT ALLOW MORE TOXICS TO

COME EVER - RADIOACTIVE WASTE BENEATH SOIL THERE.

WHERE WILL MATERIAL GO? NOT CWM!!

Optional Information

Name: [redacted]
Email: [redacted]
Addre[redacted]

Phone[redacted]

Buffalo District
Environmental Project Team
1776 Niagara Street
Buffalo, New York 14207
1.800.833.6390
fusrap@usace.army.mil
http://www.lrb.usace.army.mil/Missions/HTRW/FUSRAP/NiagaraFallsStorageSite.aspx

Please offer your comments, ask any questions, or request more information here. You may fill out this comment card now and leave it in the comment box. If you are commenting on the Interim Waste Containment Structure Operable Unit Proposed Plan, your comments will be responded to in the Record of Decision Responsiveness Summary. Please print legibly. Thank you for participating in this outreach. The Buffalo District Environmental Project Management Team values your input.

I went to Lewiston Porter School from 1965 and up. I also for a short time went to Palmer Rd School. I also had Breast Cancer, I lived at 651 Plecther Rd Lewiston from birth to 18 years old([redacted]
Alot of my Cousins in the same Area had or haves cancer.

Optional Information

Name:
Email:
Address:

Phone Number:

Buffalo District
Environmental Project Team
1776 Niagara Street
Buffalo, New York 14207
1.800.833.6390
fusrap@usace.army.mil
http://www.lrb.usace.army.mil/Missions/HTRW/FUSRAP/NiagaraFallsStorageSite.aspx

Please offer your comments, ask any questions, or request more information here. You may fill out this comment card now and leave it in the comment box. If you are commenting on the Interim Waste Containment Structure Operable Unit Proposed Plan, your comments will be responded to in the Record of Decision Responsiveness Summary. Please print legibly. Thank you for participating in this outreach. The Buffalo District Environmental Project Management Team values your input.

Looking forward to getting more information about transportation of various local materials

Optional Information

Name: [redacted]

Email: [redacted]

Address: [redacted]

Phone Number:

Buffalo District
Environmental Project Team
1776 Niagara Street
Buffalo, New York 14207
1.800.833.6390
fusrap@usace.army.mil
http://www.lrb.usace.army.mil/Missions/HTRW/FUSRAP/NiagaraFallsStorageSite.aspx

Please offer your comments, ask any questions, or request more information here. You may fill out this comment card now and leave it in the comment box. If you are commenting on the Interim Waste Containment Structure Operable Unit Proposed Plan, your comments will be responded to in the Record of Decision Responsiveness Summary. Please print legibly. Thank you for participating in this outreach. The Buffalo District Environmental Project Management Team values your input.

Trucks leaving the site with stabilized materials for shipment should be transported in a direction away from the L-P schools and bus routes. Thank you (Dickersonville Rd => 104 i.e.)

Optional Information

Name: [redacted]

Email: [redacted]

Address: [redacted]

Phone: [redacted]

Buffalo District
Environmental Project Team
1776 Niagara Street
Buffalo, New York 14207
1.800.833.6390
fusrap@usace.army.mil
http://www.lrb.usace.army.mil/Missions/HTRW/FUSRAP/NiagaraFallsStorageSite.aspx

Please offer your comments, ask any questions, or request more information here. You may fill out this comment card now and leave it in the comment box. If you are commenting on the Interim Waste Containment Structure Operable Unit Proposed Plan, your comments will be responded to in the Record of Decision Responsiveness Summary. Please print legibly. Thank you for participating in this outreach. The Buffalo District Environmental Project Management Team values your input.

Was a Cancer Study Done + When?

I have a List of The People - Relatives & Friend with Me [redacted]

Optional Information

Name:

Email:

Address:

Phone Number:

Buffalo District
Environmental Project Team
1776 Niagara Street
Buffalo, New York 14207
1.800.833.6390
fusrap@usace.army.mil
http://www.lrb.usace.army.mil/Missions/HTRW/FUSRAP/NiagaraFallsStorageSite.aspx

From: [redacted]
To:
Subject: [EXTERNAL] IWCS contents at Niagara Falls
Date: Tuesday, February 09, 2016 4:17:03 PM

I support the proposed alternative #4 to remove all of the IWCS contents at the Niagara Falls Storage Site and ship them offsite, and as soon as possible.

Sincerely,

[redacted]
Lewiston, N. Y. 14092

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau A
625 Broadway, 12th Floor, Albany, NY 12233-7015
P: (518) 402-9625 I F: (518) 402-9627
www.dec.ny.gov

February 4, 2016

Lieutenant Colonel Karl Jansen
U.S. Army Corps of Engineers, Buffalo District
1776 Niagara Street
Buffalo, New York 14207

RE: Niagara Falls Storage Site (DER #932023), Feasibility Study and Proposed Plan for Operable Unit 1 – Interim Waste Containment Structure

Dear Colonel Jansen;

This letter transmits the New York State Department of Environmental Conservation (the Department) and the New York State Department of Health joint position on the U.S. Army Corp of Engineers' (Corps) December 2015 Feasibility Study Report for the Interim Waste Containment Structure at the Niagara Falls Storage Site and the Proposed Plan, Interim Waste Containment Structure Operable Unit, Niagara Falls Storage Site.

Our agencies strongly support the Corp's selection of Alternative 4, excavation, partial treatment, and off-site disposal of the entire waste contents of the Interim Waste Containment Structure. As you know, the Department's long standing position is that this material is not suitable for permanent shallow land disposal in western New York.

Thank you for the opportunity to comment on these documents. Our detailed comments are enclosed. If you have any questions, call [redacted]

Sincerely,

[redacted]

Director
Remedial Bureau A

Enclosure

ecc: [redacted], USEPA
[redacted], NYSDOH
[redacted], NYSDOH
[redacted]

NEW YORK STATE OF OPPORTUNITY | Department of Environmental Conservation

New York State Department of Environmental Conservation
Specific comments on the
Feasibility Study Report and the Proposed Plan for the
Interim Waste Containment Structure Operable Unit, Niagara Falls Storage Site

1. As a general observation, please clarify what clean-up criteria the Corp is applying to the IWCS remediation. Is the Corp cleaning up the site to the 10 CFR 40, Appendix A: Criterion 6**,** benchmark standard of 5 and 15 for Ra-226?

2. As a general comment there are a lot of assumptions on the availability of a disposal facility being available at the time of remediation including the ability to accept 11e(2) material. This discussion is in section 2.4.5 and also in section 4.6.3.4. We hope the expected disposal location is available at the time of remediation, however if that location is not available, does the Corp have alternative disposal options available?

3. In Section 1.7 it states: "If all of the waste material in the IWCS is removed, then any remaining IWCS structures (e.g., dike and cut-off walls, residual soil that had waste placed on them, etc.) would be addressed within the scope of the Balance of Plant OU and its associated cleanup criteria." How is this unit going to be closed if there is contaminated material remaining which needs to be addressed under the Balance of Plant (BOP) Operable Unit (OU) Record of Decision (ROD)?

4. In Section 2.4.1, It should be noted that land use controls will need to be maintained at the site regardless of the remedy chosen since OU2 and OU3 have not yet had remedial determinations made.

5. Section 2.4.4.1, should contain additional discussions/evaluations on the implementability of solidification/stabilization of the Subarea A wastes with respect to airborne emission/exposures.

6. In Section 4.3.2.2 and in Appendix G regarding Alternative 2, Enhanced Containment, this alternative does not address the fact, presented in the Department's ARAR position' that the waste in Subunit A constitutes greater than Class C material and therefore is not eligible for shallow land burial.

7. In section 4.5.1.4, for the enhanced containment cap in Alternative 3B to be acceptable, Subareas A & B would need to be remediated to "free release" criteria.

8. In section 4.6.1, LUCs will be required after Alternative 4 is completed since the entire 191 acre facility will not be remediated at that time. In order for LUCs not to be required, the ROD criteria will need to be "free release". The Department recommends that the LUCs will have to be in the form of an Environmental Easement to be consistent with Part 375.

9. In Section 4.6.2.1, it states: "All IWCS waste will be removed to action levels as determined by ARARs, resulting in risk within acceptable levels". It is not clear from the text what "resulting in risks within acceptable levels" actually refers to. If this action is only applicable to the wastes within the IWCS, will media (Soil, groundwater) be remediated to acceptable levels under this action? This also again brings up the need to clearly describe the clean-up criteria.

10. In Section 4.6.3.3, regarding the discussion of the R-10 pile, wasn't the R-10 pile eventually covered because of wind and air releases?. The FS seems to downplay the potential air issues with the excavation and exposure of the material. A comprehensive discussion of the potential for airborne impacts should have been included.

11. Sections 5.3 and 6.5 both seem to focus on radiological constituents, however chemicals are also contained or potentially contained within the IWCS. Therefore statements in both sections which allude to "Alternative 4 removes all hazardous materials at the site…." may not be accurate without clearly addressing the potential for non-radiological contaminants.

12. In Appendix H, Section H.4.2: What is the "groundwater treatment building" mentioned in this section?

13. In Section H.4.3.4, A NYS SPDES permit or equivalent will be required for discharge of treated water to surface water. The Department believes a SPDES permit will require more than what is covered in this section.

14. Section H.4.5: Be aware that there is a bulldozer buried in Sub area C that will have to be addressed.

15. In Section H.4.5 on Page H-29, in the first paragraph it states: "In accordance with the conceptual design, most of the debris waste will meet the size requirements and will be disposed of as normal debris; however, approximately 4,800 yd3 will not attain size requirements and will be disposed of as oversized debris. Decontaminated and downsized rubble and debris will be transferred to lined, top-loading intermodal containers having rigid sides with a swamp mat as a base over a 10-mil plastic sheet.

The intermodal containers will be transferred to a staging area for surveying, and visible contamination will be removed. The containers will be prepared for shipment (e.g., voids filled with contaminated soil), lidded, decontaminated as needed, and placed onto flatbed trucks for transportation to the bimodal rail spur where they will be loaded into lined and covered gondola railcars and transported to the selected disposal facility.

The estimated production is approximately 40 yd3 per day considering screening, sampling, and processing requirements." Why would contaminated soil be added to decontaminated and downsized rubble to fill the voids? If the referenced rubble is being decontaminated, why is contaminated soil being added to it?

16. Appendix I relies on using Modern Landfill and CWM Chemical Services for disposal of non-radioactive solid and hazardous wastes. Given the timeframe for the initiation of the remedial action, these facilities may no longer be accepting wastes and thus planning and cost estimation based on their availability may be inappropriate as it likely artificially reduces shipping and disposal costs.

17. In Table J-2, it is important to note the potential O&M cost (non-discounted) on the alternatives. This makes Alternative 4 look better in the long run. ($0.5 billion Alternative 4 vs. $1.5 billion Alternative 2).