New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials
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Erin M. Crotty
Commissioner

April 18, 2002

Dr. Judith Leithner
U.S. Army Engineering District, Buffalo District
1776 Niagara Street
Buffalo, New York 14207-3199

Dear Dr Leithner:

Re: Niagara Falls Storage Site's Draft Continued Remedial Investigation Characterization Report: Gamma Walkover Survey and Geophysical Survey

This letter transmits the New York State Department of Environmental Conservation's (NYSDEC) comments on,Niagara Falls Storage Site's Draft Continued Remedial Investigation Characterization Report: Gamma Walkover Survey and Geophysical Survey which was delivered to our offices on February 14, 2002. Our comments are enclosed.

Thank you for the opportunity to comment on this . If you have any questions or need further information, please contact John Mitchell, of this Bureau, at (518) 402-8573.

Sincerely,

Paul J. Merges

Paul J. Merges, Ph.D., Director
Bureau of Radiation
Division of Solid & Hazardous Materials

Enclosure

cc: w/o encl - Lt. Col. G. DeWillie, USACE
w/encl. - A. Salame-Alfie, NYSDOH
P. Kranz, Erie Co.
M. Hans/J. Strickland, DEC, Reg. 9

New York State Department of Environmental Conservation
Division of Solid & Hazardous Materials
Bureau of Radiation

Comments on the
Niagara Falls Storage Site's Draft Continued Remedial Investigation Characterization Report:
Gamma Walkover Survey and Geophysical Survey (February 8, 2002)
April 18, 2002

Comment 1 Page 3-1, Section 3.1, Geologic Setting: A geologic cross section and poteniometric surface maps for each of the water bearing zones should be added to this section.

Comment 2: As a general comment, there are too many subsections in this report. Each section should have one subsection each for photos, figures and tables, not several sections. For example, photos being presented for Chapter 2, 5 and 6 is very confusing. This format probably resulted in the following comment.

Comment 3: Page 1-1, Section 1.2, Purpose and Scope of Work: The referenced photos are not included in the report.

Comment 4: Page 6-1 Section 6.0 Gamma Walkover Survey Results: We agree with the statement within this section that states: "It is important to note that statistically, for every localized area (less than 5 meter diameter) of elevated activity detected in a Class 2 area, there were four that were not." This is an important concept to remember.

Comment 5: Page 6-2, Section 6.1, Sector Summary: Sector 6 should at least be described as being a section of the Niagara Mohawk property west of the NFSS.

Comment 6: Page 6-2, Section 6.1, Sector Summary: For completeness, the results of surveys conducted in Sector 6 should, if at all possible, be included in this report. We recognize that these two surveys were done by two different contractors.

Comment 7: Page 6-2, Section 6.1.1, Sector 1: Please expand on the information presented in the last sentence of this section.

Comment 8: Page 6-2, Section 6.1.2, Sector 2: Street names should be added to the Figures, since they are referred to in the text.

Geophysical Survey Comments:

Comment 9: Page 1-2, Section 1.2, Purpose and Scope of Work: Please correct the acreage in this section (251 acres) to match the amount stated in the executive summary (230 acres).

Comment 10: Page 5-8, Section 5.6.2, EM31 Zone I and Zone II Conclusions: While we tend to agree with the statement "No contamination plumes have been identified migrating away from the WCS," the electrical "noise" at the Southeast portion of the facility would make it hard to distinguish by the electro magnetic method.

Comment 11: Page 5-12, Section 5.6.7, EM31 Zone III Conclusions: The results of this investigation should be reviewed with the information collected by Maxim to present a better picture of the site.

Comment 12: Page 6-4, Section 6.5.1, EM61 Zone I and Zone II: This section greatly enhances and complements the EM31 data.

Comment 13: Page 7-7, Section 7.5.1, Zones I and II: Are the utilities suspected of being associated with anomalies E, F and M aboveground or underground?

Comment 14: Figure 7-6: Anomaly I is not shown. Is it the N-S trending anomaly east of anomaly AA?

Comment 15: Page 8-7, Section 8.5.2, CSAMT/MT Line 1A: Please edit the first paragraph on this page. The presence of a fault should not be stated unless supported by conclusive data.

Comment 16: Page 8-9, Section 8.6, CSAMT/MT Data Summary and Conclusions: The data collected by this technology appears to be "noisy" due to anthropogenic influences. Because of this limitation, the structural geology conclusions in this section are hard to support.

Comment 17: Page 9-8, Section 9.5.1.1, EI Results Across the WCS: Could the resistivity contrast noted south of traverse 31 be associated with former building foundations?

Comment 18: Figure 10-8: How does this Figure compare with drilling data collected for the top of bedrock elevation?