



NIAGARA COUNTY DEPARTMENT OF HEALTH

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██████████, NFSS Project Manager
U.S. Army Corps of Engineers
Buffalo District FUSRAP Team
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██████████:

Niagara County Department of Health continues to have concerns regarding the adequacy of the recent "Remedial Investigation Report Addendum" (RIRA) issued by the Corps. In 2007, the RIR found that radiological contamination originating from the area of the Interim Waste Containment Structure (IWCS) is migrating eastward to the Model City site operated by Chemical Waste Management. We are concerned that the integrity of the IWCS has not been established, contrary to the RIRA conclusions, and modeling and sampling deficiencies will hamper efforts to evaluate the proposal for major excavation at model City, as well as proposals to remediate other areas of the NFSS where radiological contamination has been detected.

Specifically, NCDOH has identified three deficiencies in the RIRA. We expect to be able to comment in more detail in the future.

First, the source of highly elevated uranium in groundwater south and east of the IWCS has not been investigated. Until the source is confirmed as pre-existing contamination and not IWCS leakage, the RIRA conclusion that the integrity of the IWCS has not been compromised is premature.

Second, groundwater modeling reported in the RIRA does not take into account large scale features such as pipelines, ditches and adjacent landfills. The upward trend of concentrations of uranium in well OW-11B strongly suggests that substantial groundwater and pipeline interaction is occurring, resulting in accelerated groundwater migration across the NFSS. Historical underground water lines that connect the area of the IWCS and Model City are intact. The Corps stated on June 8, 2011 that not all NFSS pipelines have been sealed or severed. These pipelines may provide pathways for contamination to migrate off site.

PUBLIC HEALTH: PREVENT. PROMOTE. PROTECT.


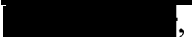
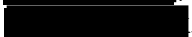
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Finally, the RIRA provides no sampling plan for the evaluation of plutonium on the NFSS. Sample selection therefore lacks a coherent rationale. We would like to see a sampling plan designed to address our concerns about plutonium on both the NFSS and open Vicinity Properties. We note that significant levels of plutonium have previously been identified on VPG, including a portion of the Model City site.

Sincerely,

A large black rectangular redaction box covering the signature of the Public Health Director.

Public Health Director

Cc: , Director, Bureau of Environmental Radiation Protection, NYSDOH
, Regional Director, NYSDEC Region 9
, Regional Administrator, USEPA, Region 2