

OCT 31 2011

[REDACTED]
NFSS Project Manager
USACE-Buffalo District
1776 Niagara Street
Buffalo, New York 14207

Re: Waste Disposal Options and Fernald Lessons Learned Technical Memorandum
For The Niagara Falls Storage Site, Lewiston New York (July 2011)

Dear [REDACTED],

The New York State Department of Environmental Conservation (the "Department") has received and reviewed the above referenced document which addressed the various residues stored within the Interim Waste Containment Structure (IWCS) at the Niagara Falls Storage Site (NFSS). The technical memorandum (TM) presents the current understanding of the residue inventory and discusses off-site waste disposal options and current viable waste disposal facilities. This TM also examines lessons learned from previous activities at the Fernald Closure Project Site in Fernald, Ohio as it related to planning, remedial design, removal, handling, packaging, shipment and disposal associated with the high activity radioactive K-65 residues which are similar to those located within the IWCS at the NFSS.

The TM provides a detailed analysis of technical and administrative issues associated with the remedial project accomplished at the Fernald site and is directly applicable as part of the evaluations and analysis required for the IWCS feasibility Study. The TM identifies and discusses many issues (remedial technologies, removal challenges, radon control, disposal options, transportation, public input and acceptance) which will need to be addressed as part of the process.

The Department agrees with the assessments made in the TM, especially those germane to the waste disposal options covered in chapter 6. As in the past, the Department will continue to express its opposition to the long term management of the K-65 wastes at the NFSS and maintain that this material is disposed of in an appropriate offsite facility. The Department also recognizes the fact that the Feasibility Study process will take time and even more time will be required to obtain funding to implement remediation of this facility.



Thank you for the opportunity to comment on this document. If you have any questions on this matter, please contact me at [REDACTED].

Sincerely, [REDACTED]

[REDACTED]
Director
Remedial Bureau A

Ecc: [REDACTED], USACE
[REDACTED], USEPA R-2
[REDACTED], NYSDEC Region9
[REDACTED], DOH
[REDACTED], DOH
[REDACTED], NCHD
[REDACTED], R9
[REDACTED], R9
[REDACTED]
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