DEPARTMENT OF THE ARMY
BUFFALO DISTRICT, CORPS OF ENGINEERS
1776 NIAGARA STREET
BUFFALO NY 14207-3199

REPLY TO
ATTENTION OF:

Special Projects Branch

June 04, 2014

SUBJECT:Niagara Falls Storage Site (NFSS) 2013 NESHAP Report

[redacted]
Radiation and Indoor Air Branch
Environmental Protection Agency, Region II
290 Broadway
New York, New York 10007

Dear [redacted]:

Enclosed please find the 2013 National Emission Standards for Hazardous Air Pollutants (NESHAPs) report for the Niagara Falls Storage Site (NFSS). This report, as it has in the past, will be included in the Corps *FUSRAP Niagara Falls Storage Site 2013 Environmental Surveillance Technical Memorandum*, which is currently under development. In summary the Corps finds that the NFSS is in compliance with 40 CFR 61, Subpart H and Subpart Q.

Compliance with 40 CFR 61, Subpart H is determined by use of USEPA approved code CAP88-PC Version 3.0. The CAP88-PC hypothetical annual maximum dose to an off-site:

Resident:	1.6 E-03 mrem
Resident Farmer:	1.3 E-03 mrem

The hypothetical annual doses to the nearest off-site worker and school corrected for 2,000 hr of exposure per year are:

Off-site worker:	1.6 E-03 mrem
School:	1.4 E-04 mrem

The hypothetical annual doses to the maximally exposed off-site individual (MEOSI) is therefore 1.6 E-03 mrem to a resident or worker.

The CAP88-PC hypothetical annual effective dose for the population within 80 km of the facility is:

Population:	4.41 E-02 person-rem

Compliance with 40 CFR 61, Subpart Q is demonstrated by the measurement of radon-222 (radon flux). Radon-222 flux at the NFSS site was measured using 180 10-inch diameter activated carbon canisters placed at 15-meter intervals across the Interim Waste Containment

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Structure (IWCS) and sealed to the surface for a 24-hour exposure period (August 22-23, 2013). Individual and average (0.056 pCi/m^2/sec) measurements were well below the NESHAPs standard for radon flux of 20 pCi/m^2/sec, with results ranging from non-detect to 0.141 pCi/m^2/s. These results are consistent with radon flux measured in previous years. The results do not exceed the established standard specified in 40 CFR 61, Subpart Q.

[redacted] is the technical point of contact for these results. He can be reached at [redacted] if you have any questions.

Sincerely,

[redacted]

Environmental Project Management Team Leader

Enclosure: FUSRAP CY2013 NESHAP ANNUAL REPORT FOR NIAGARA FALLS STORAGE SITE (NFSS)