

Amy H. Witryol

October 12, 2009

US Army Corps of Engineers, Buffalo District  
c/o Arleen K. Kreusch, APR  
Outreach Program Specialist  
1776 Niagara Street  
Buffalo, NY 14207

**RE: Scoping for Demolition - Building 401 at the Niagara Falls Storage Site ("NFSS")**

Dear Ms. Kreusch,

The Corps of Engineers recently issued a scoping document on proposed demolition of Building 401 located on the Niagara Falls Storage Site. The document requests input to ensure all of the environmental issues associated with demolition are addressed.

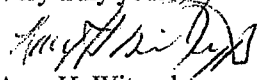
Based upon review of the Fact Sheet, Scoping Document, and NFSS Environmental Surveillance data which the Corps furnished for planning demolition of Building 401, there appears to be a lack of available information regarding the extent and type of radiological contamination found in the building. To provide meaningful comments in time for scoping, would the Corps respond to each of the requests, below:

1. The Corps stated that Building 401 has limited, fixed radiological contamination, but published no data to support this assertion. Specifically, what data did the Corps rely on for that statement? No data has been released for Building 401 beyond the core sampling results in the NFSS Remedial Investigation Report (RIR).
2. One of the concerns surrounding demolition is the past use of Building 401 to store nuclear reprocessing wastes from the Knolls Atomic Power Laboratory. Radioactive contamination arising from storage of these wastes would involve fission products, such as Cesium-137 and Strontium-90 and transuranic materials such as Plutonium; not the Radium, Uranium and Thorium usually associated with radioactive contamination on site. Past Department of Energy surveys of Building 401 only looked for Radium and Uranium. Has the Corps (or DEC or EPA) conducted its own radiological investigation of Building 401, beyond published RIR data?
3. If yes to the above, please identify the radiological contaminants of concern which the Corps has looked for within and beneath Building 401 and publish the results of all radiological surveys and analytical testing to include sample location and date.
4. As part of the NFSS RIR, the Corps took core samples to investigate potential radioactive contamination under the building. Some samples were analyzed for Plutonium which was, in fact, detected. Has the Corps looked for and/or detected Plutonium elsewhere in, beneath or around the building? Is Plutonium now considered a site contaminant on the NFSS?

May I also note that preparation of these comments was made exponentially more difficult by the Corps' refusal to recognize its duly authorized RAB and engage a facilitator to help shoulder the enormous administrative and technical burdens thrust on community and municipal stakeholders.

I look forward to your response.

Very truly yours,

  
Amy H. Witryol

p. 2, October 12, 2009

cc: Congressional Delegation  
U.S. EPA  
LOOW Restoration Advisory Board  
Town of Lewiston  
Niagara County Department of Health  
NYS Department of Health  
NYS DEC