

Lake Ontario Ordnance Works Restoration Advisory Board (LOOW-RAB)

www.loowrab.org

LOOW RAB FACT SHEET

June 24, 2008

Status of the LOOW RAB

Prepared by the LOOW RAB Steering Committee Chair

Over the past two years, the US Army Corp of Engineers (USACE) Buffalo District has attempted to minimize the impact of the LOOW RAB by claiming that it is not an "official" Department of Defense Restoration Advisory Board. A letter dated January of 2008 transmitted the USACE's interpretation that the LOOW RAB was not officially a RAB and would not be supported by the USACE Buffalo District. The LOOW RAB was established in the late 1990s and then reorganized under USACE Buffalo District guidance in 2002. The 2003 organizational structure established in collaboration between the community and USACE Buffalo District clearly established the LOOW RAB as an official RAB.

The lack of recognition of the LOOW RAB by the USACE Buffalo District has been examined by elected officials at the local, state and federal level with a strong consensus endorsement of the LOOW RAB's role in the community. Recent community meetings organized by [REDACTED] of the Village of Youngstown in January and March sought to reinforce the collective message that the community needs a viable LOOW RAB and that it must be recognized by the USACE Buffalo District. Over 25 elected officials from NY State Assembly, Senate, Niagara County Legislature and local officials signed a declaration supporting recognition of the LOOW RAB.

Here are some highlights of recent letters to the USACE

I ask that you fully recognize and support the existing LOOW RAB and support the RAB's request for a facilitator to resolve any open issues. For work to move forward at this site it is crucial that the RAB have continued access to information, dialog and input with your project staff. It is my understanding that all of the following entities support the continuation of the existing RAB: New York State Attorney General [REDACTED], New York State Department of Environmental Conservation, Niagara County Health Dept., Niagara County Legislature Chair and Vice Chair, Tuscarora Nation Environment Office, Town of Lewiston Supervisor, Town of Porter Supervisor, Village of Youngstown Board of Trustees, and the Lewiston-Porter Central School District. This is not an insignificant group of stakeholders to me or the Niagara region.

I look forward to speedy consideration of this request and hope that this dedicated group will be fully recognized and move forward with their important work as soon as possible.

[REDACTED]
U.S. Senator

☐ Well-informed citizen advisory groups play a critical role in ensuring that local communities are informed about environmental issues that impact the area. Such groups focus attention on environmental and public health issues that are most likely to be recognized by those with long-term familiarity with a site and provide valuable comments on proposed actions. Mere disagreement or conflict with the RAB, as may be the underlying issue here, is not grounds to dissolve the RAB, but instead is an indication that the RAB is fulfilling its intended purpose and that further dialogue is necessary to define and, if possible, resolve the disagreement or conflict.

For all of the reasons set forth above, the USACE should abandon its illegal attempt to dissolve and deny the existence of the LOOW RAB.

Sincerely,

Attorney General

Recognizing this once constructive relationship and the precedent of employing a facilitator during a similar period of transition in 2003, I am willing to support your request to reengage a facilitator provided you give assurances that the RAB recognizes it will likely be necessary to modify the current RAB's structure and scope to conform with 32 CFR Part 202 which states that the regulation "apply to all RABs regardless of when the RAB was established."

My Aide, [REDACTED], is available to meet with you and/or further discuss this offer of support for a facilitator.

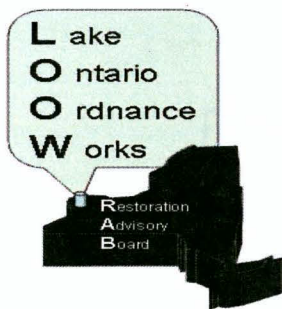
Again, [REDACTED], as evidenced by the \$100,000 I secured to initiate the Community LOOW Project, I am committed to seeing the LOOW site is properly addressed to ensure public health and safety. Again, my office will be in touch with you shortly.

Sincerely,

Member of Congress

Despite these letters and support the USACE Buffalo District has never responded to the specific issues or requests raised by [REDACTED] or [REDACTED].

The community should know that the USACE continues their efforts to circumvent community participation by the stance.



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Radiological Concerns surrounding the Niagara Falls Storage Site (NFSS)

Prepared by the LOOW RAB Steering Committee from efforts by
the LOOW RAB Radiological Committee, [REDACTED] Rad Comm Chair

The LOOW RAB, following analysis of the data released by the US Army Corp of Engineers (USACE) Buffalo District, has continuing concerns about the status of the NFSS Interim Waste Containment Structure (IWCS). The IWCS contains significant quantities of high activity radioactive waste, including approximately half of the world's known supply of radium. According to the USACE August 2007 Fact sheet "the current USACE investigations will determine whether or not the IWCS is safe in its current configuration, whether it will continue to be in the future, or if another location for this material is required. It will also determine if the remaining areas of the site require remediation".

The LOOW RAB has identified two critical concerns about the IWCS and related areas within the NFSS site. This fact sheet describes the concerns for the community.

The USACE states: "At this time, sufficient information exists regarding the IWCS contents and the short-term integrity of the IWCS to proceed with the development of remedial alternatives in the Feasibility Study. In addition to the geotechnical information and modeling predictions for the movement of contaminants in groundwater presented in the RI, the short-term integrity of the IWCS is continually monitored through the NFSS Environmental Surveillance Program."

We disagree and the concern is supported by comments from the US EPA and NYS DEC. We are concerned about the integrity of the IWCS, and the potential that plumes of uranium in groundwater surrounding the IWCS are indicative of leaks. There is insufficient information about the migration of radioactive liquids to the barrier of the IWCS since closure. How can potential releases be adequately characterized without disturbing the integrity of the IWCS cover?

The Army Corps has found some images of the original drawings. One is reproduced in Figure 1, right side. They show the number and location of buried pipelines that became an issue when radioactive materials were placed in these foundations. We have put red blocks to mark the location of pipelines entering or exiting the water reservoir. The original water pipe openings were plugged to prevent the loss of contaminated water and slimes from the buildings. The pipe openings were 8 and 30 inches in diameter. For the last 20 plus years, there has been no attempt to maintain or repair these plugs. Can we count on all of them staying leak free for another 100 or 1000 years? In addition to downward pathways there are many horizontal paths following the original pipelines and the bedding under them. Whether the pipe was plugged or removed, there still is a disturbed pathway left behind to provide a path for contaminated liquids toward the clay wall. This clay wall is the final potential barrier on seven different pathways. Four of the paths directly lead to the central drainage ditch.

Our second concern is the status of uranium groundwater plumes near the edge of the IWCS (Figure 2 bottom right next page) These plumes are near the IWCS walls, and further to the north of the IWCS, where railroad activity for the radioactive K-65 material took place (Figure 2, left). Further investigation of the plumes to the north east of the IWCS are needed, including as the plumes might be off the NFSS land to the north.

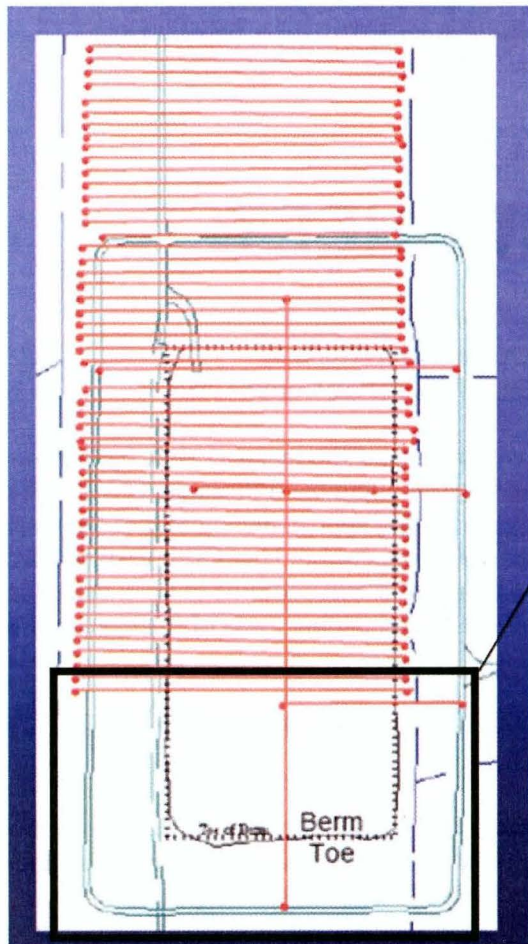
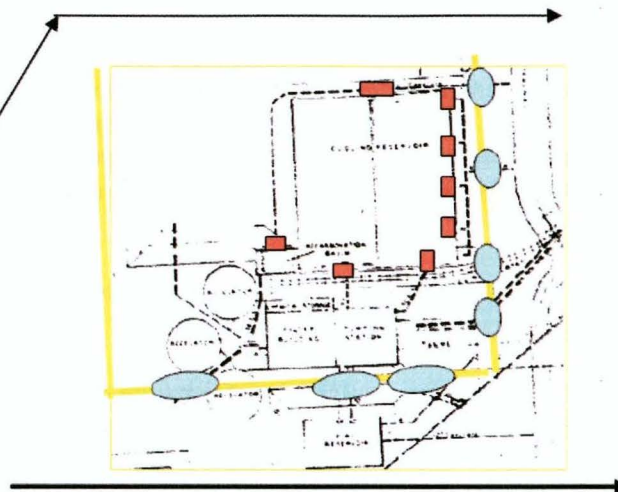


Figure 1: These two drawings come from USACE studies and reports. On the left is shown the results of testing the containment integrity of the NFSS IWCS. The testing ended because of structural interference in the area boxed at the bottom. This area is exactly where diagrams from the original construction of the building (below) show utility lines that could be sites of leakage in the concrete building structure (highlighted in blue circles). The clay wall integrity has not been examined in the critical sections adjacent to the high activity radioactive materials where the seven pathways meet the wall.



We note that the map to the left, below, in figure 2 shows Shop buildings stored Uranium and reactor wastes. We have concerns over the validity of the background groundwater value obtained for uranium. We think it is artificially high. Background samples were obtained in an area where both chemical and radiological contamination have been found in the past. We also are concerned that uranium contamination in groundwater extends further north and west of the NFSS boundary and off site groundwater contamination has been overlooked.

