

From: [REDACTED]
To: [REDACTED]
Subject: SAPs for the NFSS
Date: Thursday, February 18, 2010 3:53:31 PM

Hi [REDACTED],

We apologize for not posting the sampling and analysis plan on the web when it became final. We are evaluating potential internal procedures to ensure documentation is promptly posted to the web in the future. The September 2009 Niagara Falls Storage Site (NFSS) Remedial Investigation Addendum Work Plan that you requested is an earlier version of the November 12, 2009, NFSS RI Report Addendum Sampling and Analysis Plan that is now on the web. Additional information about the sampling is provided below:

The recent sampling took place on the Federal NFSS and in off-site locations. The sampling addressed groundwater data gaps and stakeholder comments on the Remedial Investigation Report. Through this sampling effort, the Corps better defined both the concentrations and extent of radiologic and chemical contamination at the NFSS. This information is integral in determining optimal remedial strategies for the NFSS Balance of Plant. Twenty-three groundwater locations were sampled to optimize the placement of 10 permanent wells; some of which may be sampled subsequently as part of the near-term Environmental Surveillance Program for NFSS.

In practice, it is typical to adjust sampling locations in the field vs. what is marked on the maps in a contractor's plan.

- The Corps' field sampling plan included a fluid process referred to as Triad.
- This EPA method allows flexibility in the field to modify originally proposed sample locations based on field measurements, analytical results, and visual observations throughout the field investigation.
- For example, if a temporary well was installed to delineate groundwater contamination and groundwater contamination was detected, the field team would need to identify an additional temporary well location to bound the groundwater contaminant plume (i.e., identify how far the groundwater contamination extends from the source of the contamination).
- As such, the Corps' proposed sample locations within the three areas of interest highlighted in the June 2009 public presentation using the same sampling methodologies as was used in the Remedial Investigation, but deviated from the initially proposed sample locations (still within the highlighted area of interest) once in the field based upon field screening tools and preliminary findings (expedited turnaround on some analytical results).

The sampling and analysis plan was forwarded to the New York State Department of Environmental Conservation (NYSDEC) as soon as we received it from our contractor. The cooperative agreement between the Corps and the NYSDEC requires us to provide the NYSDEC with our field sampling plans/sampling analysis plans for feedback, rather than approval. The Corps modified the field sampling plan to accommodate NYSDEC input, which actually was altered later in accordance with the Triad process to more accurately define the levels and extent of contamination initially identified in the Remedial Investigation.

The next workshop will be on Wednesday, March 24, 2010, from 6 to 9 p.m. in the Lewiston Senior Center, 4361 Lower River Road, Youngstown, NY 14174.

Again, [REDACTED], we apologize for not posting the plan to the web before the work started. We will do our best to ensure this serious oversight does not happen again.

[REDACTED]

-----Original Message-----

From: [REDACTED]
Sent: Friday, February 12, 2010 5:17 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: SAPs for the NFSS

Nice of the Corps to post it, now that the sampling is completed.

I appreciate your follow up.

■

Sent from my Verizon Wireless BlackBerry

-----Original Message-----

From: ■
Date: Fri, 12 Feb 2010 16:52:35
To: ■
Subject: RE: SAPs for the NFSS

Hi ■,

The November 12, 2009, Remedial Investigation Report Addendum Sampling and Analysis Plan is now on the web <http://www.lrb.usace.army.mil/fusrap/nfss/index.htm#Documents>

The Project Engineer is already gone for the day, so I will have to check about the other document on Tuesday when I get back in.

The sampling was performed from Mid-November to Mid-January.

■

-----Original Message-----

From: ■]
Sent: Friday, February 12, 2010 3:13 PM
To: ■
Subject: SAPs for the NFSS

Corps regulation requires an sap prior to field work. By determining locations while sampling, do you mean there was no plan in violation of regulation?

Please provide the dates of sampling. And forward and or post the documents.

Sent from my Verizon Wireless BlackBerry

-----Original Message-----

From: ■ m
Date: Fri, 12 Feb 2010 20:08:21
To: ■
Cc: ■ >
Subject: Re: Work Plans and SAPs for the NFSS

So the Corps refuses to put these documents on its website for public review?

1. How could I validate that what you are telling me is true? And determine what you do and don't consider "protocol"?
2. Do you consider pointing to "areas" on a map a technically appropriate substitute for public input on a sampling plan? If so, why would DEC want to see a plan?

■

-----Original Message-----

From: ■
To: ■ r
Subject: RE: Work Plans and SAPs for the NFSS

Sent: Feb 12, 2010 2:34 PM

Hi [REDACTED],

They are not on our website. The general locations of the areas that we planned on sampling were in our presentation for the September 2009 workshop.

The protocols used for the sampling were the same protocols used for the Niagara Falls Storage Site Remedial Investigation. The sampling locations were determined by the Corps in conjunction with a New York State Department of Environmental Conservation representative out in the field.

[REDACTED]

-----Original Message-----

From: [REDACTED]

Sent: Thursday, February 11, 2010 5:05 PM

To: [REDACTED]

Subject: Work Plans and SAPs for the NFSS

[REDACTED] -

I just learned that the DEC received:

Sept. 2009 [NFSS] RI [Report] Addendum Work Plan on Sept. 24, 2009

and a Nov. 12, 2009, "RI Report Addendum Sampling and Analysis Plan."

Are these documents on the Corps website?

(If not, why did the Corps decide to preclude public comment on them?)

[REDACTED]

Sent from my Verizon Wireless BlackBerry