

From: [REDACTED]
To: [REDACTED]
Subject: FW: Missing Info - NFSS RI Addendum plans
Date: Monday, February 22, 2010 3:14:02 PM

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

From: [REDACTED]
Sent: Monday, February 22, 2010 3:14 PM
To: [REDACTED]
Subject: RE: Missing Info - NFSS RI Addendum plans

Hello [REDACTED]
I am copying [REDACTED] in this response because she is our Freedom of Information Act Officer. Please provide [REDACTED] with an email indicating your willingness to pay costs and information about where you would like the information you requested sent.

Hi [REDACTED]
I am forwarding the request below to you as it is a Freedom of Information Act (FOIA) request for the Niagara Falls Storage Site.

Thank you,

[REDACTED]
US Army Corps of Engineers, Buffalo District
1776 Niagara Street
Buffalo, NY 14207

Phone: [REDACTED]
Fax: [REDACTED]

[REDACTED]
-----Original Message-----

From: [REDACTED]
Sent: Friday, February 19, 2010 3:47 PM
To: [REDACTED]
Subject: Re: Missing Info - NFSS RI Addendum plans

Dear [REDACTED]:

On behalf of the Lewiston Porter Schools, as their technical representative, and their appointee to the LOOW RAB, and on behalf of the LOOW RAB, I would like to second the three requests that are submitted by [REDACTED].

We have no access to the technical information that the Corp insists is publicly available. Online access is absolutely necessary.

Thanks

[REDACTED]
University at Buffalo, SUNY

Chair, LOOW RAB Steering Committee
[REDACTED]

> Hi [REDACTED],
>
> For 12 years since RAB formation, the Corps has precluded the public
> from comment on virtually every sampling plan. Might this explain
> public distrust of the Corps? and gaps in Corps work at the site? and
> why the RAB requested an independent facilitator?
>
> This time, the Corps barred public comment on information you rightly
> described as, "integral in determining optimal remedial strategies for
> the NFSS."
>
> 1. Please provide the Sept. 2009 NFSS RI Addendum Work Plan. (My third
> request.)
> We want to determine for ourselves what changes the Corps made for the Nov.
> 2009 Plan just posted on the web, as a result of its private
> discussions with DEC about the Sept. Plan.
>
> 2. Please provide all information and results from what you described
> as the "field screening tools and preliminary findings (expedited
> turnaround on some analytical results)" for the associated field work conducted to date.
>
> 3. Please provide a list of Corps sampling plans for field work at the
> NFSS/LOOW since 1999 - identifying which, if any, were provided to the
> RAB/public in ADVANCE of field work.
>
> Your apology is a first, and much appreciated, however, history
> suggests little prospect for change absent an independent facilitator.
>
> Thanks, and have a nice weekend.

> [REDACTED]
>
> -----Original Message-----
> From: [REDACTED]
> Sent: Thursday, February 18, 2010 3:53 PM
> To: [REDACTED]
> Subject: SAPs for the NFSS

> 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.

>

> [REDACTED]

>

> Sent from my Verizon Wireless BlackBerry

>

> -----Original Message-----

> From: [REDACTED]
> Date: Fri, 12 Feb 2010 16:52:35
> To: [REDACTED]
> Subject: RE: SAPs for the NFSS

>

> Hi [REDACTED]

> 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.

> [REDACTED]
>
> -----Original Message-----

> From: [REDACTED]
> Sent: Friday, February 12, 2010 3:13 PM
> To: [REDACTED]
> Cc: [REDACTED]
> 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: [REDACTED]
> Date: Fri, 12 Feb 2010 20:08:21
> To: [REDACTED] >
> Cc: [REDACTED]
> [REDACTED]
> 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?

> [REDACTED]
>
> -----Original Message-----

> From: [REDACTED]
> To: [REDACTED]
> 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]

>

>

>

>

>

>