



NIAGARA COUNTY DEPARTMENT OF HEALTH
ENVIRONMENTAL HEALTH DIVISION
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January 14, 2016

U.S. Army Corps of Engineers, Buffalo District
Attention: Environmental Project Management Team
1776 Niagara Street
Buffalo, NY 14201

Re: Feasibility Study and Proposed Plan, Interim Waste Containment Structure Operable Unit,
Niagara Falls Storage Site

Dear Environmental Project Team:

This Department has reviewed the selected "Alternative 4" referenced in the above noted document and understands it is the U.S. Army Corp's preferred alternative, stating it will provide the best overall protection of human health and the environment. The Niagara County Department of Health (NCDOH) agrees that Alternative 4, which provides for excavation, partial treatment, and off-site disposal of the entire contents of the Interim Waste Containment Structure, is the best alternative that will ultimately provide the greatest protection to Niagara County residents by removing the residues from Niagara County for all time.

The Department has had concerns that data gathered during the Remedial Investigation phase of the project has been suspect with regard to potential for leakage, and/or represents legacy contamination that is making ongoing monitoring for leakage difficult. Maintenance of effort to care for the facility has been excellent to date but can't be guaranteed due to the unpredictability of future social, economic, and natural conditions that could jeopardize the financial commitment of the federal government to continue that care indefinitely.

We commend the U.S. Army Corp for their investigation and interpretation of the data collected as the selected alternative addresses the above concerns by moving the residue materials to a more secure permanent facility. This Department will remain committed to continue to review and comment on the final design to be implemented. NCDOH will insist that adequate safeguards be in place regarding waste handling and transportation so as to prevent accidents and unacceptable exposures to ionizing radiation during the course of the removal action.

Sincerely,

Director of Environmental Health

Cc: , Director of NCDOH
 , President of Niagara County Board of Health