

[REDACTED]  
[REDACTED]: [REDACTED] E LRB  
Sent: Tuesday, March 05, 2002 10:16 AM

**Subject:** Seaway Landfill Tech Memo TM for summer testing

I believe the below constitutes USEPA's comments; the state DEC and DOH are the only non responders now.

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

[REDACTED]  
[REDACTED]  
Sent: Tuesday, March 05, 2002 10:01 AM

**Subject:** Seaway Landfill Tech Memo

[REDACTED]:  
Thank you very much for sending us a copy of the Technical Memorandum - Summer 2001 Subsurface Investigation at the Seaway Site Areas A, B, and C, Tonawanda, New York, Review Draft, January 18, 2002, and requesting our comments. The investigation was valuable in providing current information on the extent of the contamination at Seaway after so many years have passed since the MED-related materials were emplaced. I have a few comments on the report for your consideration.

Page 6-2, Section 6.4 Additional Findings and Conclusions: The rest of the paragraph beginning with the sentence "Reviewing the objectives identified in Section 2.1.2 . . ." seems out of place in a paragraph that discusses the effectiveness of the shielded 2x2m BHP and BEGe.

Page 6-2, Section 6.4 Additional Findings and Conclusions: Are the 5 bullets the conclusions? It would be helpful to show in a clearer manner the relationship between the 5 bullets and the 7 Principal Study Questions and 4 Objectives listed in Section 2.1.2. In Section 2.1.2, the relationship between the 7 Questions and 4 Objectives were clearly identified.

With respect to Principal Study Question 3, I raise the issue of whether the information is sufficient to assign a KD value for MED material that is commingled with trash and to conclude that MED radioactivity will not leach into the leachate collection system within 1000 years. For a majority of the boreholes with a layer exhibiting elevated radiation levels, the layer is described as "silty clay trash mix" or "trash". In addition, there were several boreholes with no recovery or no log for the elevated radiation layer.

With respect to Figure 4-10: Why is there certainty the contamination does not reach the lower stone road? Admittedly, it is near surface and a thin layer, so probably not much of an impact volume-estimation-wise.

I was unable to find the gamma log for SEA ARC-1004 in my copy of the Exhibits volume.

Thank you for the opportunity to provide comments. Please give me a call if you have any questions.