

Tonawanda 200-12

New York State Department of Environmental Conservation
270 Michigan Avenue, Buffalo, New York 14203-2999
(716) 851-7220



**DIVISION OF SOLID & HAZARDOUS MATERIALS
MEETING AGENDA**

SUBJECT: Town of Tonawanda Landfill Closure Project

DATE: April 29, 1998, 1:00 PM
NYSDEC Region 9 Office, 1st Floor Hearing Room

INTRODUCTIONS:

| | |
|----------------------|-----------------------------|
| NYSDEC | US Army Corps of Engineers |
| Town of Tonawanda | Niagara Mohawk Power Corp. |
| Malcolm Pirnie, Inc. | Erie County Water Authority |

BACKGROUND:

Discussion of landfill history and NYSDEC requirements/schedule for closure.

ISSUES:

US Army Corps of Engineers

- Discussion of FUSRAP Program; rad wastes investigation and closure

Niagara Mohawk Power Corp.

- Waste removal from NMPC right-of-way adjacent to landfill.
- Construction/Safety issues

Erie County Water Authority

- Existing and future 48" water transmission lines.
- Use of pipeline bedding for leachate collection.

NYSDEC

- Response to comments/completion of CIR
- Closure Plan / Variance request submittals
- Americium-241 wastes
- Interim Groundwater Monitoring Plan
- Finalize Order on Consent
- CW/CA Bond Act Grant Application

FOLLOW UP:

- Schedule for Landfill Closure
- Public Notification/Town Meeting ?
- Next Meeting(s)

TON_00032

**MEETING MINUTES
APRIL 29, 1998**

TOWN OF TONAWANDA LANDFILL CLOSURE

Attendees: See Attached Sign-in Sheet

Agenda: Attached

Minutes:

Overview/Outstanding Issues - The NYSDEC () gave a brief overview of the project status and identified the following outstanding issues:

- Material on NMPC Property
- ECWA Center Line Easement
- Americum Disposal Areas
- Low-level DOE Waste Disposal Areas
- Closure Schedule

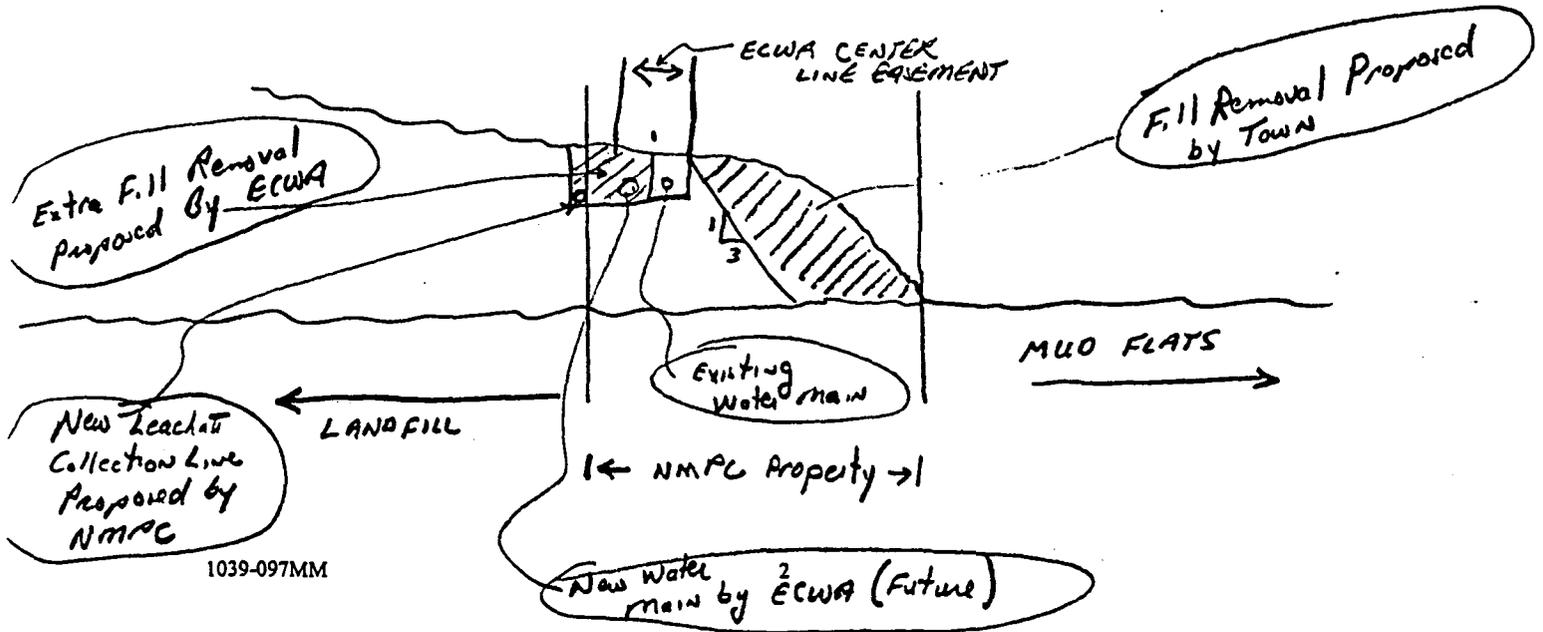
Closure Approach - Malcolm Pirnie () explained the basic closure approach focusing on the NMPC property and the associated ECWA center line easement. The basic approach was explained as follows:

- **Waste Removal** - Fill and/or waste material present on the NMPC property will be excavated and relocated to the landfill footprint with the exception of the ECWA center line easement. The removal activities will start at the ECWA center line easement boundary and proceed vertically at a maximum 1:3 slope to native material, and then horizontally toward the Mud Flats until all visual signs of waste/fill have been removed. A separation distance will be maintained from poles and/or towers as agreed to with NMPC. All water collected as part of excavation activities will be transported to the Town's WWTP or to an alternative off-site WWTP for treatment. No verification sampling is planned.
- **ECWA Center Line Easement** - Since the ECWA has investigated the easement and found no significant impacts on or restricted uses for the easement, no excavation is planned for the ECWA easement. The property will be graded along with placement of topsoil (and seeding) as necessary to achieve power line separation requirements and/or to promote storm water runoff.

- ***Leachate Collection*** - The bedding for the existing ECWA 48-inch water line will be drained at the southwest corner of the landfill to serve as a leachate collection system along the southern boundary of the landfill. The leachate will be either conveyed to the Town's WWTP or collected for off-site treatment.
- ***Grade/Site Restoration*** - The 1:3 excavation slope created on NMPC property as a result of waste/fill removal will be capped with a lower permeability soil or synthetic cover system. The remaining excavated area will then be filled and/or graded as agreed to with NMPC.

ECWA Center Line Easement Discussion - The ECWA (Wes Dust) expressed their concern that waste would remain in their easement and that they still plan to construct a second parallel water main to develop a redundant supply to the Amherst area. The ECWA asked what NMPC's position was on waste removal. NMPC indicated they would like as much of the material removed as possible. Malcolm Pirnie and the Town emphasized that removal of waste in and around the existing 48-inch line was impractical. The NYSDEC (Annette Sansone) pointed out that the ECWA constructed the line in waste and therefore, has to accept responsibility for the problem. The Town pointed out that the ECWA's own consultants have indicated that there is no problem with use of the easement. The ECWA indicated they did not agree with their consultants and that there were additional supplemental reports (OB&G and Tallamy) which did indicate a problem with use of the easement. The ECWA was asked if they could coordinate construction of the new line with closure of the landfill. The ECWA responded saying that no funds (estimated cost of \$2-2.5M) were available in the proposed time frame to construct the new water line. The ECWA also indicated there would be extra costs to construct the water line in the existing waste/fill material.

Alternative ECWA Center Line Easement Approach - The ECWA suggested an alternative approach which would include excavation of material from the proposed alignment of the new water main to the depth of the existing line and NMPC indicated that they would prefer installation of a separate leachate collection line on Town property as shown below:



The NYSDEC asked if this approach would be acceptable to all three parties and all three agreed that it would.

Verification Sampling - NMPC asked if the NYSDEC was in agreement with the approach for waste removal which does not include verification sampling. Malcolm Pirnie described the logic behind the approach which included the lack of documented impact, ability to differentiate between fill and native material, the low permeability of the native material and the plan to construct the clay or synthetic barrier along the edge of the exposed fill. The NYSDEC concurred and added that the site has not shown significant groundwater quality impacts.

FUSRAP Status - The USCOE, Bechtel and SAIC provide a summary of the on-going investigation of the Tonawanda Landfill. They still haven't made a determination that the waste is MED waste. This determination will be made by October-November 1998. They concurred that 2-3 feet of additional cover should be sufficient if the waste is closed in-place. The Town has already agreed to 3-feet of additional cover over the Americum 241 wastes as requested by the NYSDEC Bureau of Radiation.

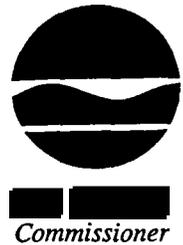
The USCOE also brought up some additional issues:

- Reported that they have heard rumors that the Town dredged and hauled the material to the landfill (PRP issue). The Town indicated no knowledge of this occurring.
- They are looking into potential for radon gas migration. Malcolm Pirnie indicated this could be important given the plan to install a leachate collection and gas migration/venting system along the boundary of the landfill near the MED waste area and the proximity of nearby City of Tonawanda residences.
- They asked what the plan was for post-closure monitoring. Malcolm Pirnie indicated that the plan would be consistent with Part 360, i.e., 30 years. The USCOE indicated this was a short period for MED waste sites.
- The determination of MED waste is important because it may impact the direction the project takes (viz. full CERCLA process or directly negotiate with Town for in-place closure). They are looking at removal but feel closure-in-place will be more feasible.

Summary

- A USCOE determination by October-November 1998 should be consistent with the current overall closure process for the Town of Tonawanda Landfill. Any delays would necessarily delay the closure process.
- The USCOE agreed to provide Malcolm Pirnie with the recent investigation report for the landfill and will add the various parties to their information distribution list.
- The Town agreed to address regulatory comments on the Closure Investigation Report (CIR) in approximately 2-3 weeks, to meet with the NYSDEC to discuss the response and then to finalize the CIR within an additional 2-3 weeks.
- The Town agreed to supply draft copies of the concept closure plan to NMPC and ECWA for review prior to resubmission to the NYSDEC.

The next progress meeting was scheduled for June 8, 1998 at 10:00 at NYSDEC in Buffalo.



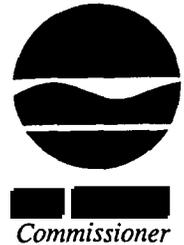
DIVISION OF SOLID & HAZARDOUS MATERIALS

MEETING ATTENDANCE LIST

SUBJECT: Town of Tonawanda Landfill

DATE: April 29, 1998

| <u>NAME</u> | <u>REPRESENTATION</u> | <u>TELEPHONE #</u> |
|----------------|---------------------------------------|-----------------------|
| 1. [REDACTED] | <u>NYSDEC - Reg. 9</u> | <u>716/851-7220</u> |
| 2. [REDACTED] | <u>NYSDEC Radiation Section</u> | <u>(518) 457-2225</u> |
| 3. [REDACTED] | <u>Bectel National, Inc</u> | <u>(423) 220-2457</u> |
| 4. [REDACTED] | <u>SAIC - USACE</u> | <u>(508) 946-3500</u> |
| 5. [REDACTED] | <u>USACE Buffalo District</u> | <u>(716) 879-4287</u> |
| 6. [REDACTED] | <u>Erie County Water Authority</u> | <u>(716) 684-1510</u> |
| 7. [REDACTED] | <u>Erie County Water Authority</u> | <u>(716) 684-1510</u> |
| 8. [REDACTED] | <u>Town of Tonawanda</u> | <u>(716) 693-4900</u> |
| 9. [REDACTED] | <u>MALCOLM PIRNIE</u> | <u>(716) 667-6606</u> |
| 10. [REDACTED] | <u>"</u> | <u>(716) 667-6601</u> |
| 11. [REDACTED] | <u>Niagara Mohawk (Environmental)</u> | <u>(315) 428-3101</u> |
| 12. [REDACTED] | <u>NMPC - SYSTEM LAW DEP'T</u> | <u>315-428-6944</u> |
| 13. [REDACTED] | <u>" Buffalo Landfill</u> | <u>(716) 857-4273</u> |
| 14. [REDACTED] | <u>NMPC - LAND & R.O.W.</u> | <u>831-7464</u> |
| 15. [REDACTED] | <u>NYSDEC - Reg 9</u> | <u>(716) 851-7220</u> |
| 16. [REDACTED] | <u>DEC - NY Reg 9</u> | <u>716 851-7194</u> |



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| <u>NAME</u> | <u>REPRESENTATION</u> | <u>TELEPHONE #</u> |
|---------------|---|--------------------|
| 1. [REDACTED] | <u>US Army Corps of Engers</u> | <u>879 4146</u> |
| 2. [REDACTED] | <u>U.S. Army Corps of Engineers (Council)</u> | <u>879-4183</u> |
| 3. [REDACTED] | <u>Town of Tonawanda</u> | <u>852 3540</u> |
| 4. [REDACTED] | <u>Town of Tonawanda</u> | <u>877 8804</u> |
| 5. [REDACTED] | <u>ECWA</u> | <u>849-8429</u> |
| 6. [REDACTED] | <u>ECWA</u> | <u>849-8433</u> |
| 7. [REDACTED] | <u>Town of Tonawanda</u> | <u>877-8805</u> |
| 8. [REDACTED] | <u>Malcolm Pierce</u> | <u>667-6607</u> |
| 9. _____ | _____ | _____ |
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| 14. _____ | _____ | _____ |
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