



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
BUFFALO DISTRICT
1776 NIAGARA STREET
BUFFALO, NY 14207-3199

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MAILROOM

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Special Projects Branch

APR - 3 2006

SUBJECT: Tonawanda Landfill Vicinity Property Remedial Investigation Report

██████████ P.E.
City Engineer
City of Tonawanda
200 Niagara Street
Tonawanda, NY 14150

Dear ██████████:

This letter is in response to your letter dated 28 March 2006. The Corps of Engineers appreciates your feedback on the Final Remedial Investigation Report for the Tonawanda Landfill Vicinity Property FUSRAP Site in Tonawanda, New York. We have addressed each of your questions and concerns below.

1) Has any sampling and testing been performed on the other side of the fence from the Landfill OU in the City of Tonawanda? Dust migration is identified as a possible transport scenario. I did not see any data in the report on it.

No sampling has been done outside of the boundaries of the Town of Tonawanda Landfill and the Mudflats Area. FUSRAP investigations can only be expanded outside of the designated properties (i.e., the Town of Tonawanda Landfill and Mudflats Area) if there is evidence that contamination has migrated from the property. Gamma walkover surveys and soil sampling along the northern boundary of the Landfill did not find any evidence of MED-like material migrating outside of the boundaries of the Landfill. Therefore, sampling of the residential properties in the City of Tonawanda is outside of the current scope and authority of this FUSRAP site.

Airborne dust migration can be a potential concern if contamination is present in the surface soils of a site, and exposed to the elements. However, at the Town of Tonawanda Landfill, the vegetative cover in the areas of concern reduces the potential for airborne dust migration of surface soils.

2) Why wasn't a Risk Assessment performed for the neighboring Residential Users in the City of Tonawanda? The report identifies the risk at CERCLA thresholds for the Recreational User in certain areas. Shouldn't the risk be assessed for the residents in the City of Tonawanda to assuage their concerns about residing across a fence from the MED material?

The Baseline Risk Assessment evaluates the health risk to the individuals with the greatest potential for direct exposure to contaminants, based on the site use. Because the residences are not built directly on the areas with MED-like material within the Landfill, as long as the residents do not cross the fence line onto Landfill property, they will not receive direct exposure to the MED-like material. However, based partly on reports that adjacent residents have crossed the fence line onto Landfill property, the Baseline Risk Assessment evaluated a recreational user, or someone who spends limited time physically on the site, as the individual with the greatest potential for direct exposure. The Baseline Risk Assessment concluded that under current site conditions, the risk to the recreational user is within acceptable USEPA guidelines.

3) Migration of Uranium through groundwater is identified as a possible transport scenario, The City of Tonawanda has an active 24" storm sewer that runs parallel to the City/Town fence line from Hamilton to Brookside and eventually drains to Two-Mile Creek. One of the manholes shows up on your plans near the end of Wadsworth Ave. The other manholes were probably missed or are buried. Has there been any testing performed in these manholes or at their outfall to determine if this transport scenario has occurred?

Sampling was not conducted in the manholes or the outfall. Screening criteria for uranium in groundwater were exceeded in one well, Well L-3, which is located within the area of MED-like material in the Landfill, and away from the identified storm sewer. Two wells closer to the identified storm sewer, Wells L-2 and L-3, exhibited uranium levels well below the screening criteria. Also, past sampling of Two-Mile Creek as part of other FUSRAP investigations did not find elevated radioactivity in the Creek. Finally, capping of the Landfill will reduce the potential for future migration of MED-like material in groundwater.

4) I am concerned about the policy of leaving the MED and Americium material in place, to be covered when the landfill is capped. Rattlesnake Creek was cleaned up, which had no nearby residences. Wouldn't it make sense to remove the material which is in such a close proximity to permanent residences?

Under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the law that governs the FUSRAP investigation and cleanup process, the reasonable future use of a site is considered when determining the need for potential cleanup. Rattlesnake Creek was cleaned up to be protective of a residential future use, as there is the reasonable potential for future residential development at that site. The Town of Tonawanda Landfill, however, is a municipal landfill, and is scheduled for closure and capping, thus limiting the potential future uses of the site. Therefore, the reasonable future site use is recreational use on top of a capped landfill, and the Baseline Risk Assessment concluded that for that site use, the risks to site users from the MED-like material are within the acceptable USEPA risk limits.

Please note that the Baseline Risk Assessment conducted by the Corps of Engineers only applies to the MED-like material in the Town of Tonawanda Landfill and Mudflats. The Corps

of Engineers did not evaluate the potential human health risks associated with Americium in the Landfill, as Americium is not eligible for inclusion in FUSRAP. Any questions or comments relating to Americium at the site should be directed to the Town of Tonawanda.

If you have any further questions, feel free to contact me at 716-879-4287.

Sincerely,



Project Manager