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**town of
Tonawanda** water resources department

water/sewer maintenance division

██████████
director of water resources

May 1, 2001

██████████

Project Manager
Department of the Army
Buffalo District, Corps of Engineers
1776 Niagara Street
Buffalo, NY 14207-3199

RE: SAP AND SSHP FOR THE TOWN OF TONAWANDA FUSRAP SITE
COMMENTS ON DRAFT PLANS

Dear ██████████

The following are comments on the plan. Please note that the Town had similar comments on the initial work plan. We hope the Department incorporates the comments below into the SAP and the SSHP.

Comments on the Sampling and Analysis Plan

1. Page 1 – 3, Bottom of Page – The project goal needs to include the following:

Delineate the portion of the site that has not been impacted by the MED waste. The defined limit will allow the Town of Tonawanda to complete the closure of the landfill in accordance with NYSDEC Part 360.

And,

Assess the lateral extent of the MED in the residential areas adjacent to the previous study areas on the north side of the site.

2. Page 1 – 4, Top of Page 6 – Was the NORM waste in the other FURAP sites removed? Could you please elaborate on the cleanup levels proposed for this site? Also, are these the same clean up levels proposed at the other FUSRAP locations in Tonawanda? Does it matter whether it is NORM or MED waste, regardless, won't it be removed?

3. Page 1 – 5, First Bullet, What is the impact of this assumption? Could the COF be excluded material from the program that would otherwise have to be addressed?
4. Page 1 – 6, Will you be the finger printing the waste? Does it matter whether you have an exact match with the Linde Sites?

Comments on the Site Safety and Health Plan (SSHP)

1. The health and safety of the residents along the property line to the north of the site should be addressed. Health and safety provisions need to be provided for investigation on the residential properties should the extent of the waste go onto these properties.

Thank you for the opportunity to review the work plans for the site. I would like to stress that the Town would like the Corp. to provide a “limit of work” so the Town can complete the closure of the existing landfill at the earliest possible time.



Director of Water Resources

JSC/maf

cc: [REDACTED] P.E.
[REDACTED] DEC
[REDACTED] DEC
[REDACTED] DEC