



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

REPLY TO
ATTENTION OF:

June 9, 2008

Executive Office

SUBJECT: Additional Sampling of the Tonawanda Landfill Vicinity Property

[REDACTED]
City of Tonawanda
200 Niagara Street
Tonawanda, NY 14150
[REDACTED]

I am writing in response to your letter dated 28 April 2008, regarding the additional sampling that the Corps of Engineers plans to conduct in the Tonawanda Landfill Formerly Utilized Sites Remedial Action Program (FUSRAP) Vicinity Property.

First, I would like to apologize for not providing your office a copy of the News Release issued by the Buffalo District regarding the additional sampling. We are taking the necessary steps to rectify this oversight, so that it will not happen again in the future.

With regard to your concern over our past collection of data, I want to ensure you that at no time in our previous sampling efforts at the Landfill did the Corps of Engineers collect composite samples or average sample results over the entire length of the soil cores collected. Instead, we collected discrete 6-inch samples from the surface of each soil boring, and also at depths where our field screening protocol indicated that elevated radioactivity could be present in each soil core. This discrete sampling data was then used to develop the Baseline Risk Assessment (BRA), following the procedures and guidance established by the U.S. Environmental Protection Agency, to determine the potential risk from the FUSRAP material to site users. One of the steps in preparing a BRA is to calculate an Exposure Point Concentration (EPC), a statistical averaging of samples over a certain depth and area, which represents the average concentration of contaminants that a site user could be exposed to over their time spent on a site. For the Tonawanda Landfill, the BRA for the recreational user calculated the EPC using the sampling data in the top two feet of soil, over that portion of the Landfill that contained all of the sample results that were above normal background levels. This approach was followed to avoid "diluting" of impacted areas of the Landfill with clean sample results from the remainder of the Landfill, so that the human health risk would not be underestimated.

Finally, with regard to your concern over sampling on the residential properties adjacent to the Landfill, I understand the concerns the adjacent residents have over potential contamination on their properties, and as such one of the prime objectives of our additional investigation is to re-examine the nature and extent of FUSRAP material at the site. However, the Corps of Engineers is still in the early planning stages for the additional sampling, and has not yet

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determined whether offsite sampling will be conducted. We will send the City of Tonawanda a copy of the sampling plans upon their completion, prior to conducting the sampling.

Thank you for your continued interest in this matter. I would be happy to have the Tonawanda Landfill FUSRAP Project Team meet with you to update you on the sampling plan development and discuss any concerns you may have. If you have any questions, please contact the Project Manager for the Tonawanda Landfill Vicinity Property, Mr. Stephen Buechi, at 716-879-4287.

Air Assault!

Sincerely,



J

Lieutenant Colonel, Corps of Engineers
District Commander