

Niagara Falls Storage Site
Balance of Plant and Groundwater Operable Units
Proposed Plan Questions and Answers
As of October 29, 2020

Email October 24, 2020

Question 1: By what means and by which routes will materials be removed?

Response 1: Shipping routes have not yet been determined. The Corps of Engineers will develop these with the future site remediation contractor. The Corps of Engineers will ultimately approve routes for use by the contractor and will consult with the Tuscarora Nation, state, county and local officials before routes are approved and used. The Corps of Engineers is aware of community concerns regarding proximity to the Lewiston Porter school campus and concerns expressed by the Tuscarora Nation.

Question 2: After cleanup has been completed will the site be put on the open market for sale?

Response 2: The future of the federal NFSS property will be determined by the U.S. Department of Energy after the Corps of Engineers completes the cleanup. Two years after the Corps completes remediation and final closeout activities at the Niagara Falls Storage Site, the site, along with responsibility for any necessary long-term stewardship, reverts to the U.S. Department of Energy Office of Legacy Management. Their website listed below provides details on the site redevelopment process and gives examples from other FUSRAP sites.

<https://www.energy.gov/lm/services/property-management>

Email October 15, 2020

Question 1: Based on the data presented, how did USACE conclude that there is no contamination beneath the slabs of Buildings 430 and 431/432?

Response 2: In the feasibility study, the Corps makes no assertions about the condition of the soil beneath the building foundations. As part of the remedial pre-design effort for Alternative 3, the building foundations and the underlying soil will be characterized. If the data shows contamination in the soil, it is likely that the data will also show that the overlying foundation is contaminated. All contaminated material would be removed, and a post-excavation assessment performed to ensure compliance with clean-up criteria.

Question 2: Wouldn't it be prudent to spend the contingency, which is almost equal to the cost difference between Alternative 2 and Alternative 3, and completely remove the foundations of these buildings and totally remediate the site?

Response 2: Regarding the difference in the contingency costs between Alternatives 2 and 3, the majority is attributed to the higher quantity of material assumed for transportation and off-site disposal under Alternative 2, which is the only difference between these alternatives. If sampling and analysis performed during the remedial pre-design effort indicate all the foundations (i.e., total volumes) and underlying soil are contaminated, the costs to implement Alternatives 2 and 3 would be the same. Since it is unlikely that the total foundation volumes (and underlying soil) are contaminated, it is assumed under Alternative 3 that only a fraction (the top 6 inches) of the foundations will require remedial action.

Email October 14, 2020

Question 1: I thought the Corps had agreed to 4, complete remediation, what is this proposed plan about?

Response1: The Corps completed the decision making for the most significant source of contamination at the site – the Interim Waste Containment Structure (IWCS). In March 2019 the Corps of Engineers signed a record of decision to completely remove the entire IWCS, process the contaminated materials, and ship the materials out of state for permanent disposal. Since then the Corps has actively pursued the development of the remedial design contract to remediate the site. We expect to award this design contract in 2021.

The Corps has also been progressing the decision-making process for contamination located on the NFSS but outside the IWCS. Release of the proposed plan on October 5, 2020, for the Balance of Plant and Groundwater Operable Units (OUs) is a significant step forward. This plan proposes a remedy for addressing contaminated soils, buildings and building foundations, utilities, roads and roadbeds known as the Balance of Plant OU, and contaminated groundwater known as the Groundwater OU. The Corps of Engineers' preferred alternative, outlined for the Balance of Plant and Groundwater OUs in the proposed plan, is Alternative 3: Removal with Building Decontamination. Under Alternative 3, impacted soil, road bedding, and groundwater are removed; the foundation and utilities of former Building 401 are removed; and Building 433 and the foundations of former Buildings 430 and 431/432 are decontaminated by scarifying (mechanically grinding the surface) and left in place. FUSRAP-related material that is removed will be transported off-site for disposal at an appropriately permitted disposal facility. Following implementation of Alternative 3, the site would be remediated to levels suitable for industrial use (i.e., protective of both construction and industrial workers). Five-year reviews will be conducted to ensure continued protectiveness of the remedy

Email October 7, 2020

Question 1: What is the standard that will be used to measure the clean up by?

Response 1: Given the current zoning of NFSS and the presence of adjacent municipal and hazardous waste landfills, the land use scenario considered for development of the site is industrial.

Question 2: Will it be cleaned up according to the Rural Residential Standard that the property was used as prior to the U.S. Government acquiring it?

Response 2: All of the remedial alternatives evaluated in the Balance of Plant and Groundwater Operable Units feasibility study assumed that Niagara Falls Storage Site would be cleaned up to levels suitable for industrial use.

Email October 1, 2020

Question 1: If my review takes longer than Oct. 21st, can I send in preliminary (basic) questions and get an informal reply from staff, prior to the comment period deadline?

Response 1: Yes, we will respond to email inquiries as we normally do.

Question 2: I recall that the public was once asked to envision a completed NFSS, my recollection is that most folks wanted a park - is that feasible under an industrial level clean up?

Response 2: The Corps' clean up goals for the Balance of Plant Operable Unit are based on the planned future industrial use as described in the feasibility study. Following completion of the Corps project, the site will remain federally owned. Future redevelopment of the site for other purposes than industrial will be the responsibility of the U.S. Department of Energy Office of Legacy Management. Their website listed below provides details on the site redevelopment process and gives examples from other FUSRAP sites.

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