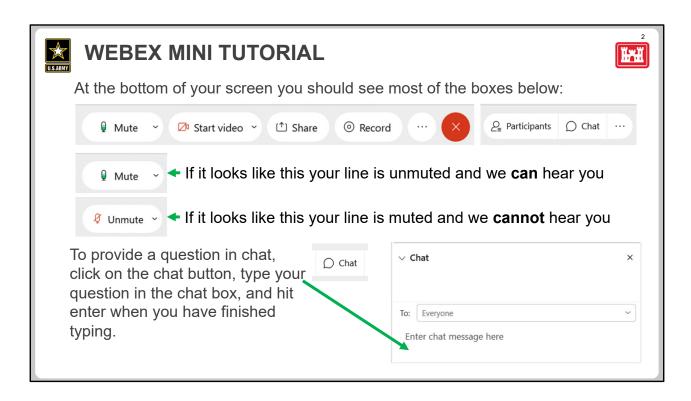


WELCOME TO OUR VIRTUAL PUBLIC MEETING



- If you did not have your computer call you to connect to the audio portion of the meeting, please reconnect to the meeting using the "Call Me" function. Type in the phone number you would like to use to listen to this presentation.
- If you are hearing feedback on your phone line, turn the sound down on your computer and move your phone further away from your computer.
- This meeting is being recorded and a court recorder is on the line to capture your comments on the proposed plan.
- The meeting transcript, including anything in the chat, will be posted to the project website.
- The chat will be monitored for questions.
- The project website will periodically be updated with responses to questions regarding the proposed plan before the comment period closes on September 10, 2021.
- Those that registered to provide comments on the proposed plan will be called during the comment portion of the meeting in the order that the registrations were received.
- If you did not register to comment, but you would like to, at the designated time, please type your name in the chat.

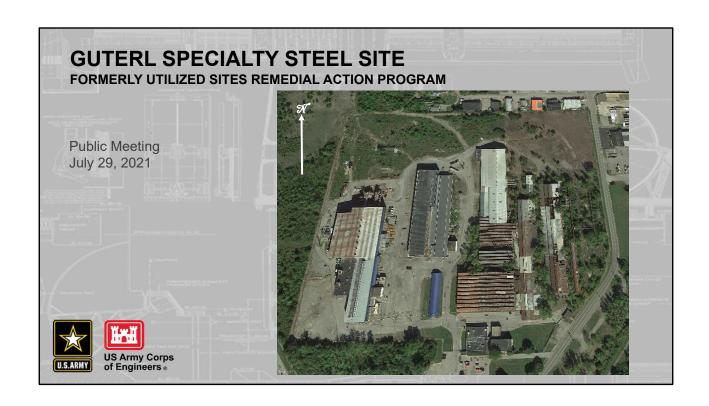
Good evening everyone! This meeting is being recorded. A court recorder is also on the line to prepare an official transcript of the meeting. Please keep your phones on mute during the presentation portion of this meeting. During the public comment portion of the meeting, you will be called in the order that you signed up to speak.



To orient you a little to Webex, some of the icons shown above will be visible on the bottom of your screen. Again, please keep your phones on mute during the presentation portion of this meeting.

If you have a question, please click on the chat icon and type in your question. Please hit enter when you are finished typing.

The chat box will be monitored during the presentation and your questions will be addressed after the comment portion of the meeting is completed.



It's my pleasure to introduce Lieutenant Colonel , the Commander of the U.S. Army Corps of Engineers Buffalo District.

Good evening everyone! I regret that we are not able to meet in person tonight, but the current COVID-19 circumstances preclude that possibility.

The Buffalo District serves the people in the watersheds of the lower Great Lakes from Massena, New York, in the east to the Indiana state line in the west, and we've done so since 1857.

We have many projects within this area of responsibility, but this one is close to home. Many of our nearly 300 employees from the Buffalo District live in this community, and we care about serving all our fellow citizens and safeguarding them. The number one priority during our decision-making process and subsequent cleanup of Formerly Utilized Sites Remedial Action Program, or FUSRAP, sites is the protection of human health and the environment. Cleanup activities are conducted in a manner that is safe for on-site workers and the community.





Agenda

- Introductions
- Background Information
- Site Status
- Feasibility Study
- Remedial Alternative Evaluation and Preferred Alternative Selection
- Comments

Our agenda is on this slide. Tonight's session is being recorded by a court recorder. Once we have completed the presentation, we will receive your comments. Commenters will be called in the order that they registered.

Questions can be placed in the chat section. Questions received in the chat will be addressed after the comment portion of the meeting. The questions and answers will also be posted on the project website.

Thank you for participating in our virtual meeting. I would like to take this time to thank the federal, state, and local elected officials and agency representatives who are joining us tonight.

Legislator, representing the 13th District of Niagara County, has also joined the meeting and would like to say a few words.

Mayor , representing the City of Lockport, would also like to say a few words.

Thank you, I now turn this meeting over to , Guterl Site Project Manager.





AEC Atomic Energy Commission

CERCLA Comprehensive Environmental Response,

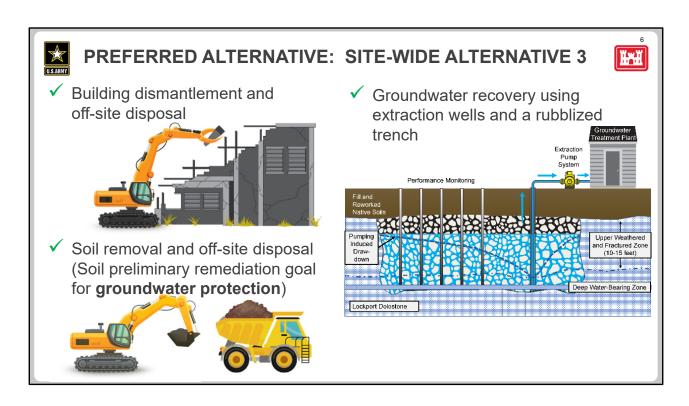
Compensation, and Liability Act

CFR Code of Federal Regulations

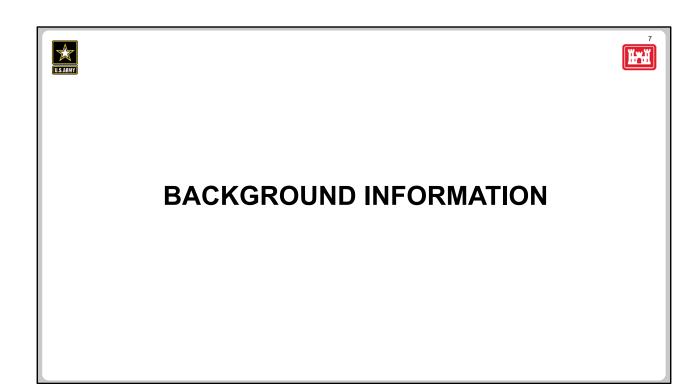
FUSRAP Formerly Utilized Sites Remedial Action Program

O&M Operations and Maintenance

Thank you, Sir. Good evening everyone! Before I get started, we tried to keep our use of acronyms on these slides to a minimum. These are some of the acronyms that are used in the presentation. These acronyms will be explained when they are used on a slide.



We are here tonight to discuss the proposed plan for the Guterl Specialty Steel Site, which is being addressed under FUSRAP. Most importantly, we are here to receive your comments on the proposed plan preferred alternative, which is shown on the screen. Our preferred alternative is the result of complex and meticulous analysis that we have performed since we last met with you to discuss the results of our remedial investigation of the site. As we walk through the slides in this presentation, we will go into more detail about the process we followed to arrive at the preferred alternative and the other alternatives that were considered. In our judgement, the remedial action outlined in the preferred alternative, Alternative 3, provides the best overall long-term protection of human health and the environment.



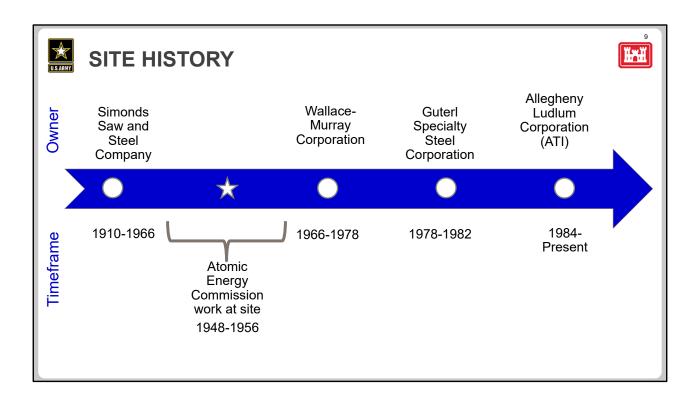
It has been a while since we have met with you regarding this site, so I am going to go cover some background information first.



The work we are doing at the Guterl Specialty Steel Site is authorized under FUSRAP. The program was initiated in 1974 to identify, investigate, and, if necessary, clean up or control sites throughout the United States that were contaminated as a result of Manhattan Engineer District or early Atomic Energy Commission activities.

The objectives for FUSRAP are identified on this slide.

Our number one priority while performing activities at the site is the protection of human health and the environment and the safety of the community and site workers.

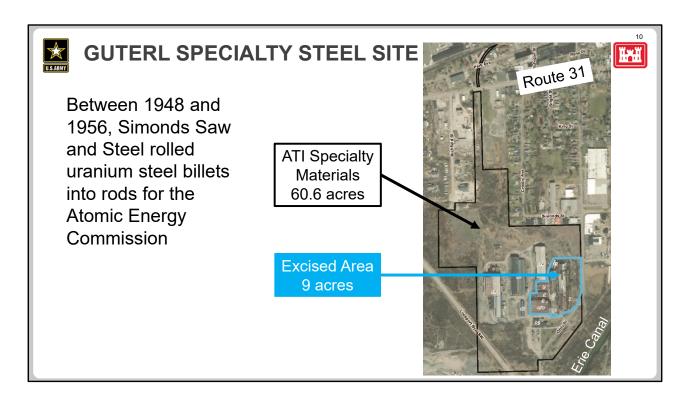


Use of the site began in 1910, when it was owned and operated by Simonds Saw and Steel Company to manufacture steel and specialty steel alloys. Simonds owned the site through 1966. During its period of ownership, and specifically during World War II, normal plant operations were suspended, and the plant conducted operations for the U.S. Government under various contracts:

- Between 1948 and 1952, the New York Operations Office of the Atomic Energy Commission (or AEC) managed a contract with Simonds to roll uranium steel billets into rods.
- Between 1952 and 1956, Simonds continued the rolling work under a subcontract to National Lead Company of Ohio; who was under contract to the AEC.

Under each contract, the uranium metal billets were received on the site by rail car, were rolled to contract specifications, and then were transported back off-site by rail car. Records indicate that Simonds processed between 25 million and 35 million pounds of natural uranium metal and approximately 30,000 to 40,000 pounds of thorium metal between 1948 and 1956.

In 1966, the site was sold to Wallace-Murray Corporation, who operated the site until 1978. In 1978, the site was sold to Guterl Specialty Steel Corporation, who operated the site until 1982. In 1982, Guterl filed for Chapter 11 bankruptcy protection. In 1984, Allegheny Ludlum Corporation (now ATI Specialty Materials) purchased Guterl Specialty Steel Corporation's assets. An approximate nine-acre portion of property, which is now known as the Excised Area, was removed from the sale. Equipment used during the time Simonds conducted work for the Atomic Energy Commission was also excluded from the sale.

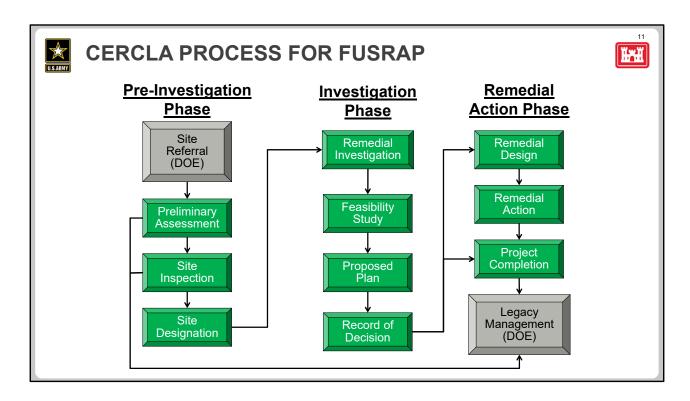


The Guterl Specialty Steel Site is located in Lockport, New York, situated north of the Erie Canal.

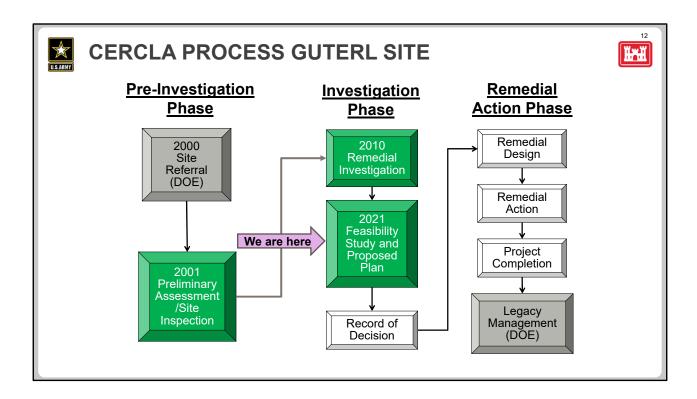
The Guterl Site is comprised of two areas:

The 60.6-acre ATI Specialty Materials property includes four buildings that were constructed after the termination of AEC activities. ATI currently operates an active specialty steel manufacturing facility in the southwest portion of this property.

The 9-acre Excised Area, owned by Guterl Specialty Steel, includes nine buildings located in the southeast corner of the site that were used by the AEC to roll uranium metal. These buildings are currently abandoned, and a chain link security fence surrounds the inactive buildings.

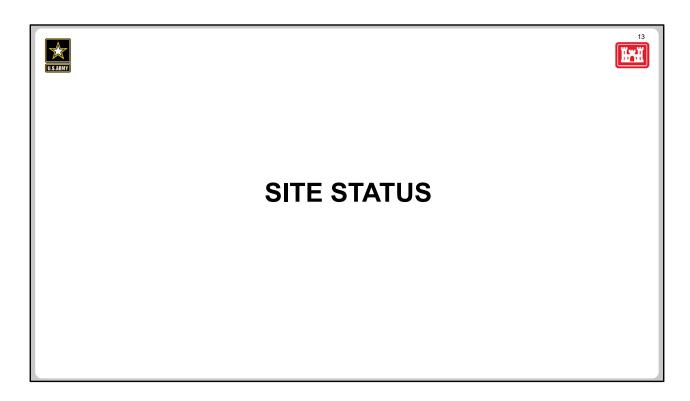


When implementing FUSRAP, the Corps of Engineers follows the Comprehensive Environmental Response, Compensation, and Liability Act, or CERCLA, as amended and the National Oil and Hazardous Substances Pollution Contingency Plan using the process that is outlined on the screen.

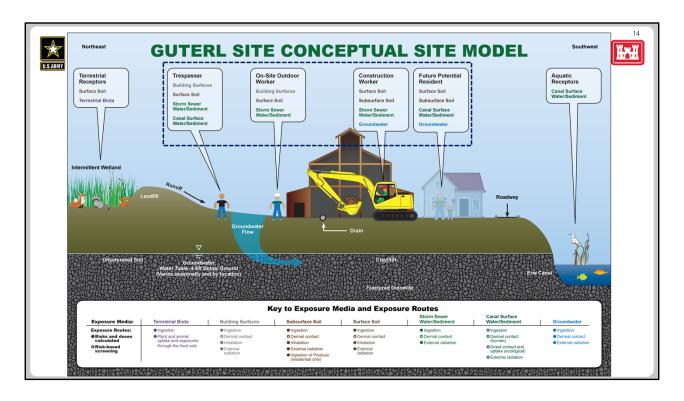


This is the CERCLA process again with the years entered for the activities that have taken place for the Guterl Site. In 2000, the site was referred to the Corps of Engineers by the U.S. Department of Energy, or DOE, as potentially eligible for FUSRAP. The Corps completed the preliminary assessment/site inspection in 2001. During 2010, the remedial investigation report for the site was released. The Guterl Site is currently in the feasibility study and proposed plan phase. The reason we are together virtually tonight is to receive your comments on our proposed plan for the Guterl Site.

Once we have considered your comments, our next step will be to reach a record of decision, which will outline the selected remedy for the site. We estimate that due to priorities for sites already in remediation within the FUSRAP national program, it will be several years before we can begin remediating the Guterl Site.



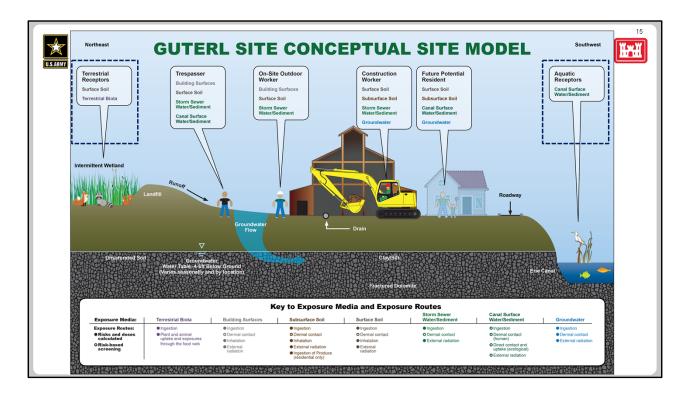
I am now going to provide you with a recap of the remedial investigation findings for the site.



The conceptual site model on this slide indicates the potential exposure pathways from contamination in site soils, surface water, sewer or storm water, groundwater and in the buildings.

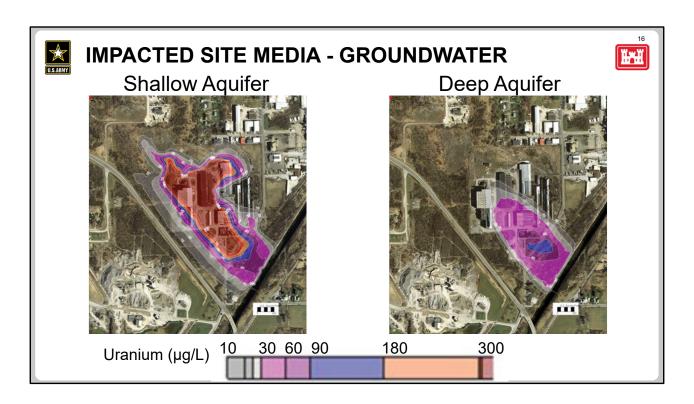
When we performed the remedial investigation, a baseline risk assessment was conducted. The risk assessment included a human health risk assessment and a screening level ecological risk assessment. The text bubbles inside the dotted box focus on the potential receptors in the human health risk assessment.

The human health risk assessment indicated that some increased risk existed for persons within the project area when long term exposure is assumed, if the buildings in the excised portion of the site were to be re-occupied for industrial or commercial use. The greatest potential human health risks at the site are posed by exposure to building materials and contaminated soils beneath Building 8 and a localized area of elevated activity in surface soil within the railroad right of way. Uranium in groundwater below some areas of the site could pose unacceptable risks if the site groundwater was used as a source for potable drinking water. The Erie Canal is not a medium of concern for human health, because uranium concentrations are not elevated in the canal.



The text bubbles inside the dotted boxes on this slide focus on the potential receptors in the screening level ecological risk assessment. The Erie Canal is not a medium of concern for ecological receptors, because uranium concentrations are not elevated in the canal. Some potential risks to terrestrial ecological receptors at the Guterl Site were identified based on this evaluation. Since the radiological standards (dose rate limits) for protection of human health are generally more conservative than recommended dose rate standards for protection of ecological populations, it is generally assumed that the environment is protected when remedial actions are taken to protect people from exposure to FUSRAP-related materials.

Based on the results of a human health risk assessment and screening level ecological risk assessment, response actions are necessary to protect public health from unacceptable risks posed by FUSRAP-related constituents in buildings, site soils and groundwater. When developing alternatives in the feasibility study, we considered the potential exposure pathways to humans and the environment of the FUSRAP-related contaminants based on the reasonably anticipated future land use.



These figures show the current conditions for uranium contamination in the groundwater at the site. Groundwater is underground water. It resides within the cracks, crevices, and spaces in soil, sand and rock. Groundwater within the shallow bedrock aquifer is observed within a few feet of the ground surface and extends to an approximate depth of 20 to 30 feet. The deep water-bearing zone is encountered at approximately 35 to 40 feet below ground surface. The Environmental Protection Agency's maximum contaminant level for community drinking water resources is 30 μ g/L for uranium.



GROUNDWATER MONITORING





There is no current risk to human health or the environment from uranium in site groundwater

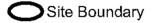
Legend



Shallow Monitoring Well





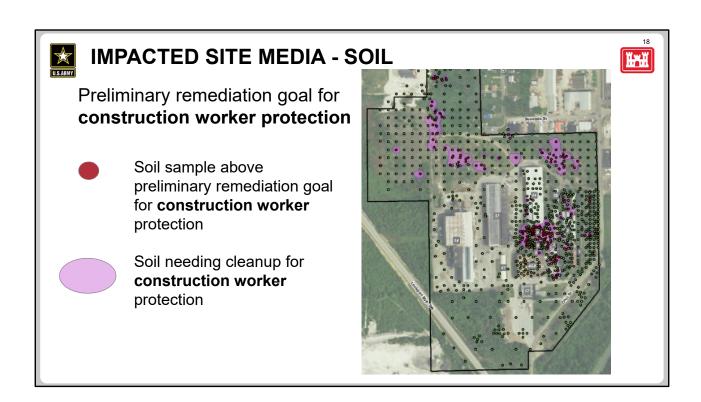


Groundwater monitoring is performed at the site to:

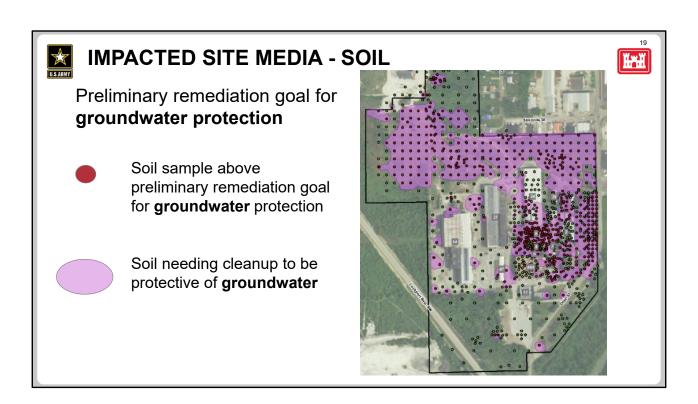
- 1. Determine the potential for movement of FUSRAP-related radiological contaminants associated with historical Atomic Energy Commission activities
- 2. Develop baseline data for monitoring groundwater for use in assessing effectiveness of remedial alternatives once implemented
- 3. Develop and evaluate alternatives to address unacceptable risks

Uranium concentrations in groundwater at the Guterl Site remain consistent with historical results and exemplify seasonal fluctuations derived from variations in groundwater recharge through contaminated site soils. Groundwater under the site is currently not a utilized source of drinking water. Niagara County's drinking water comes from the upper Niagara River. As indicated by groundwater monitoring, contaminated groundwater is not degrading surface water in the Erie Canal. Therefore, there is no unnacceptable risk to human health or the environment from uranium in site groundwater.

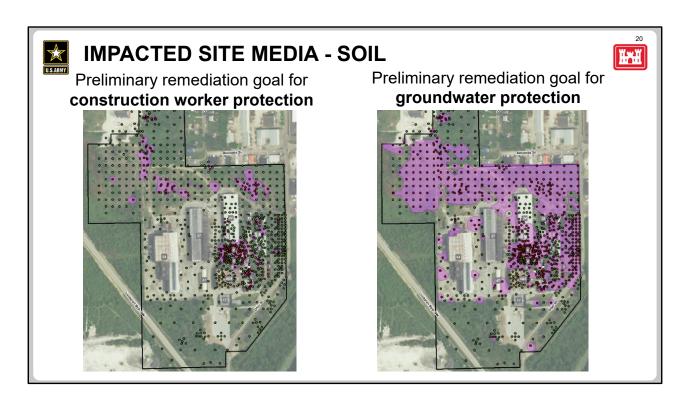
Groundwater underlying the Guterl Site is of sufficient quality and quantity to be considered for drinking water purposes. Potential health risks could occur if the groundwater was to be used as potable water, as receptors could consume contaminated groundwater at uranium concentrations above the national primary drinking water regulation. This potential health risk is the reason for groundwater remediation at the Guterl Site.



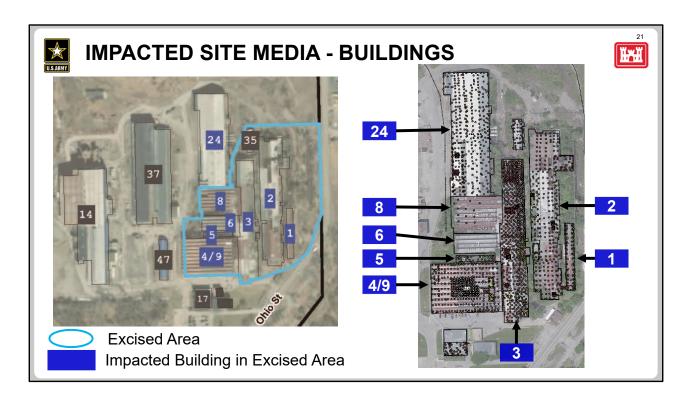
Site soil is impacted with FUSRAP-related materials. The purple areas in this figure show the impacts of the soil contamination using a preliminary cleanup goal based on risk. This figure shows approximately 5,000 cubic yards of soil would need to be removed in order to protect a construction worker from direct contact exposure; to just the soil (via ingestion, inhalation, and external gamma).



The purple areas in this figure show that approximately 58,000 cubic yards of soil, the majority of which is within 18 inches of the surface, needs to be removed to protect the underlying groundwater from impacts of uranium leaching from the soil to the groundwater. It assumes that the underlying contaminated groundwater would then be used as a potable source of drinking water (which it currently is not).



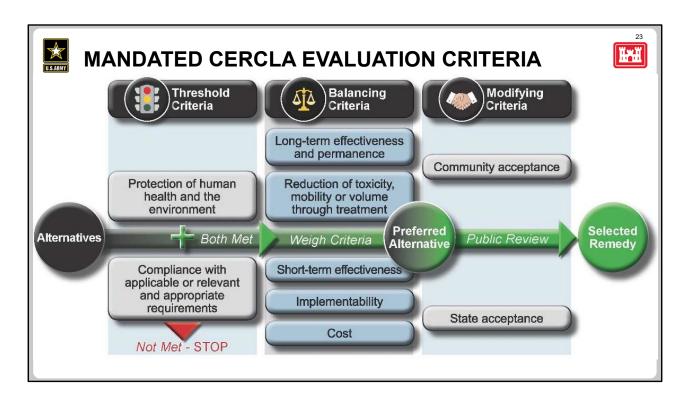
As you can see while comparing the two figures, The volume of soil that needs to be removed to be protective of groundwater is much greater than would need to be removed to be protective of the construction worker.



In the figure on your left as you look at the screen you can see that most of the impacted buildings are within the boundary of the excised area, the light blue outlined area. The figure on your right is enlarged and shows the sample locations for samples taken in the buildings (note that these are building material samples and different from soil samples).



Before we developed a proposed plan, we developed potential alternatives to address FUSRAP-related contamination on the Guterl Site.



A feasibility study is performed to identify, develop, and evaluate remedial alternatives, analyzing in detail each remedial alternative.

Reading from left to right as you look at the screen, A potential remedial alternative is evaluated for its:

- Overall protection of human health and the environment
- Compliance with applicable or relevant and appropriate requirements.

If these first two criteria are not met, an alternative cannot be considered.

Balancing Criteria are considered next. They are the primary criteria used for a detailed analysis of the developed alternatives and are used to select the preferred alternative based on the best balance among the criteria.

- Long-term effectiveness and permanence;
- Reduction of Toxicity, mobility, or volume through treatment;
- Short-term effectiveness;
- Implementability; and
- Cost.

The last two criteria, or modifying criteria are considered based on the comments received on the proposed plan.



APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS)



Federal Regulations:

- Title 10 Code of Federal Regulations (CFR) Part 20, Subpart E: Section 20.1402: Radiological Criteria for Unrestricted Use
- Title 40 CFR 141, Subpart G: Section 141.66: Maximum Contaminant Levels for Radionuclides

Applicable or relevant and appropriate requirements or ARARs are the standards for cleanup of contaminants used in conjunction with risk-based levels developed in the risk assessment. These are used to direct response actions at CERCLA sites.

Another one of our acronyms is on this slide, Code of Federal Regulations (CFR). The district identified these federal regulations as relevant and appropriate requirements for the Guterl Site. The second regulation listed above is relevant and appropriate for site groundwater since the aquifer below the site could be used for drinking water in the future although it is currently not being used for drinking water.

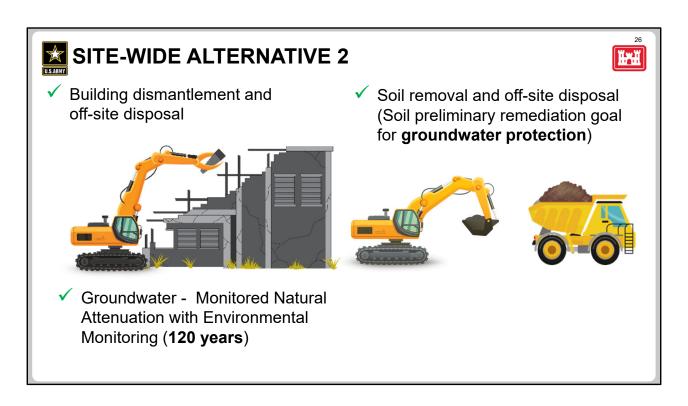


REMEDIAL ALTERNATIVES

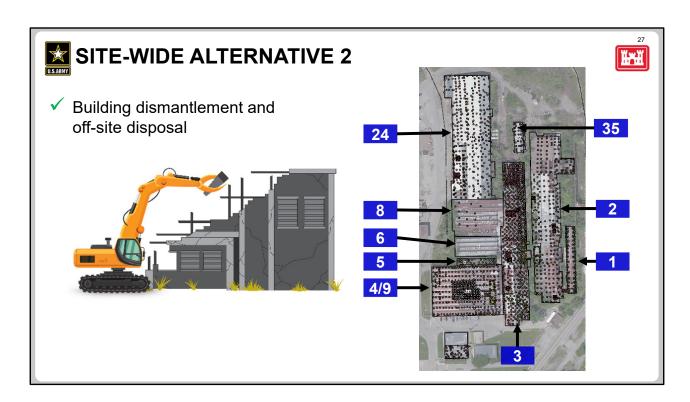


- Site-Wide Alternative 1 No Action (Required for comparison purposes, but not protective)
- Site-Wide Alternative 2 Dismantlement and Off-Site Disposal of Buildings 1, 2, 3, 4/9, 5, 6, 8, 24, and 35; Complete Soil Removal to the Soil Preliminary Remediation Goal Groundwater and Off-Site Disposal; Monitored Natural Attenuation with Environmental Monitoring
- Site-Wide Alternative 3 Dismantlement and Off-Site Disposal of Buildings 1, 2, 3, 4/9, 5, 6, 8, 24 and 35; Complete Soil Removal to the Soil Preliminary Remediation Goal Groundwater and Off-Site Disposal; Groundwater Recovery Using Extraction Wells and a Rubblized Trench with Ex Situ Treatment, with Environmental Monitoring
- Site-Wide Alternative 4 Decontamination of Building 1; Dismantlement and Off-Site Disposal of Buildings 2, 3, 4/9, 5, 6, 8, and 24; Complete Soil Removal to the Soil Preliminary Remediation Goal Construction Worker and Off-Site Disposal; Monitored Natural Attenuation with Environmental Monitoring

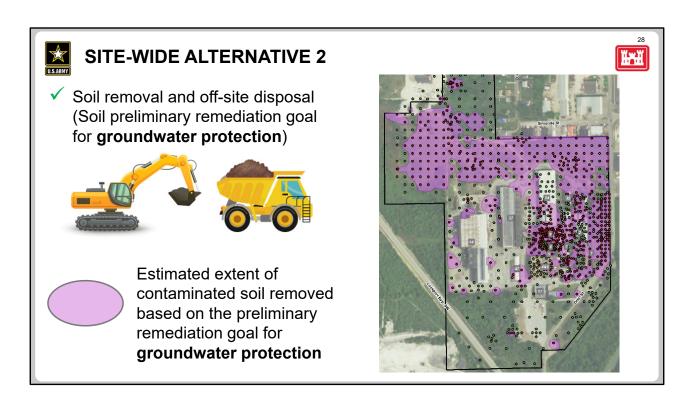
The alternatives outlined in the feasibility study are listed on this slide. Site-Wide Alternative 1 is No Action. This alternative is developed for comparison purposes only. The alternative is not protective of human health and the environment and does not meet applicable or relevant and appropriate requirements, so we will not be discussing it further tonight. It is not considered a viable option. We will be discussing Site-Wide alternatives 2, 3, and 4 in the upcoming slides. Site-Wide Alternative 3, which is boxed in green is our preferred alternative.



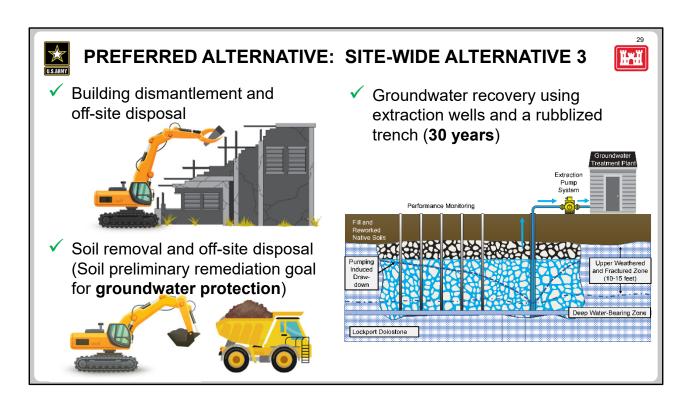
Site-Wide Alternative 2 includes dismantlement and off-site disposal of buildings that were involved in AEC activities; soil removal to meet the soil preliminary remediation goal for groundwater protection (approximately 58,000 cubic yards of soil) and off-site disposal; and monitored natural attenuation of groundwater with environmental monitoring. Monitored natural attenuation is a systematic approach of modeling, predicting, monitoring, and measuring the rate at which the natural attenuation of contaminants occurs in a groundwater system. For this alternative, it is expected to take approximately 120 years for the uranium concentrations in groundwater to achieve the EPA's maximum contaminant level for community drinking water sources, which is necessary to be fully protective of human health and the environment.



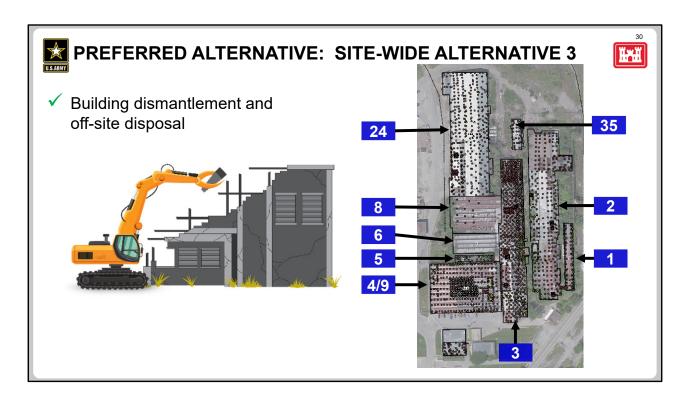
The buildings where AEC activities took place, which are highlighted with blue numbers on the slide, would be dismantled and disposed of off-site under Site-Wide Alternative 2.



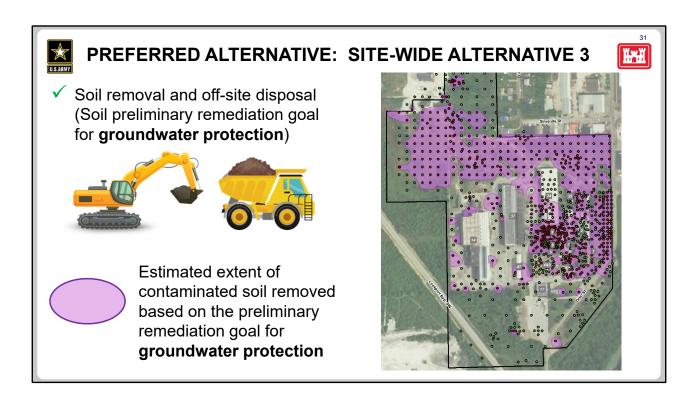
This slide shows the estimated extent of soil (approximately 58,000 cubic yards) that will be removed and disposed of off-site using the preliminary remediation goal for groundwater protection. The vast majority of this soil is located within 12 to 18 inches of the surface, with select areas of deeper soil in the northern portion of the site.



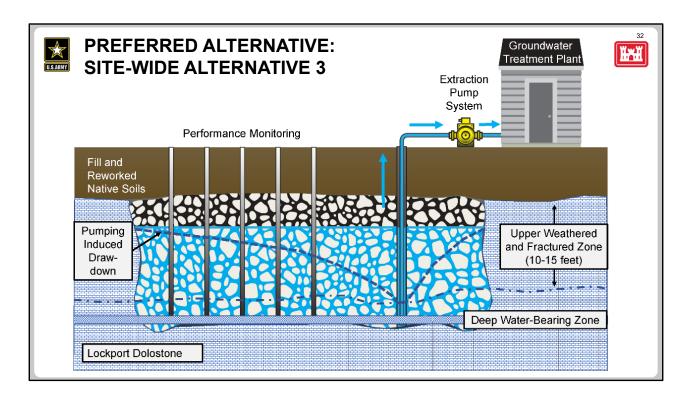
Site-Wide Alternative 3 is the Corps' preferred alternative for the site. The alternative includes dismantlement and off-site disposal of buildings that were involved in AEC activities; soil removal to meet the soil preliminary remediation goal for groundwater protection and off-site disposal; and groundwater recovery using extraction wells and a rubblized trench with *ex situ* treatment and environmental monitoring. Building dismantlement and soil remediation actions will take approximately two years. This alternative is estimated to take approximately 30 years for the uranium concentrations in groundwater to achieve the EPA's maximum contaminant level for community drinking water sources. This alternative will be explained further in the next set of slides.



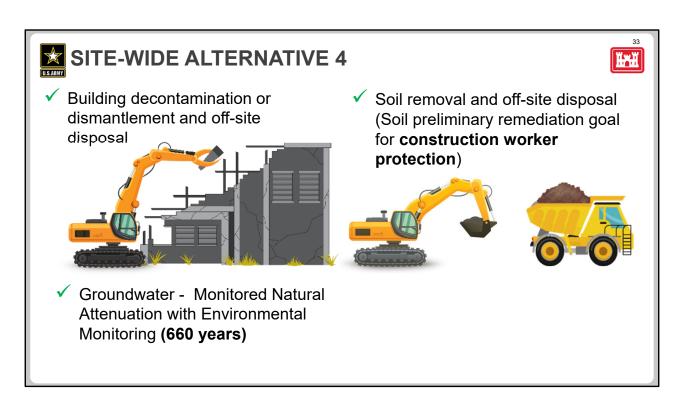
In Site-Wide Alternative 3, the buildings where AEC activities took place, would be dismantled and disposed of off-site.



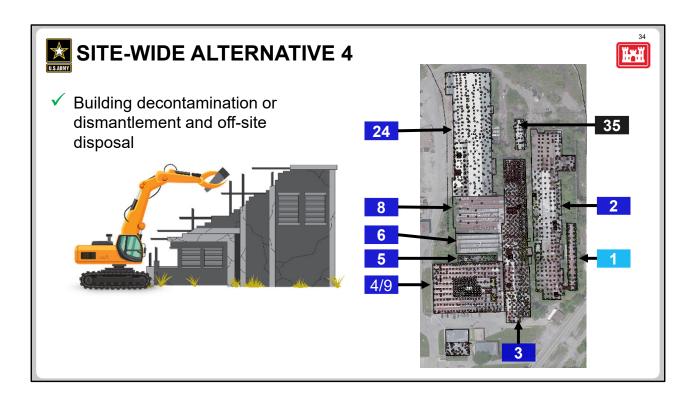
This slide shows the estimated extent of soil (approximately 58,000 cubic yards) that will be removed and disposed of off-site using the preliminary remediation goal for groundwater protection.



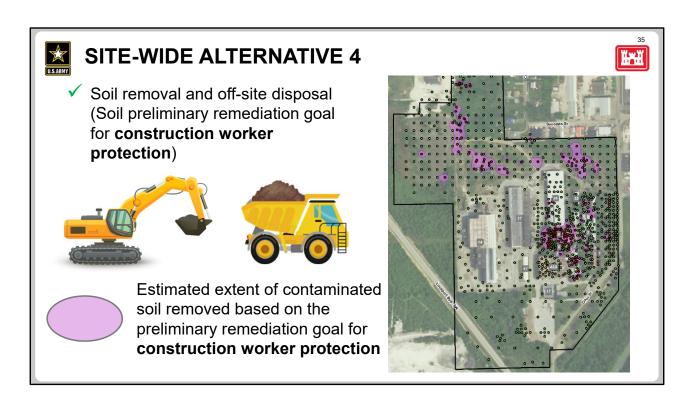
This is an expanded view of the rubbilized trench and the pump and treat portion of the alternative. A rubblized trench is an extraction technology process option installed in an area to extract groundwater for treatment. Small explosives placed underground are used to fracture the bedrock into highly permeable material to enhance the extraction of groundwater. A sump and extraction wells are then placed in the trenches to collect groundwater inflow. The groundwater is pumped into a treatment plant, treated, and then discharged into surface water after treatment. Wells would monitor the level of contamination in the groundwater.



Site-Wide Alternative 4, includes the dismantlement and off-site disposal of some of the buildings that were involved in AEC activities. This will be explained further on the next slide. Contaminated soil is removed to the soil preliminary remediation goal for protection of the construction worker and disposed of off-site. Groundwater is monitored for natural attenuation with environmental monitoring. It is estimated that it would take almost 660 years for the uranium concentrations in groundwater to achieve the EPA's maximum contaminant level.



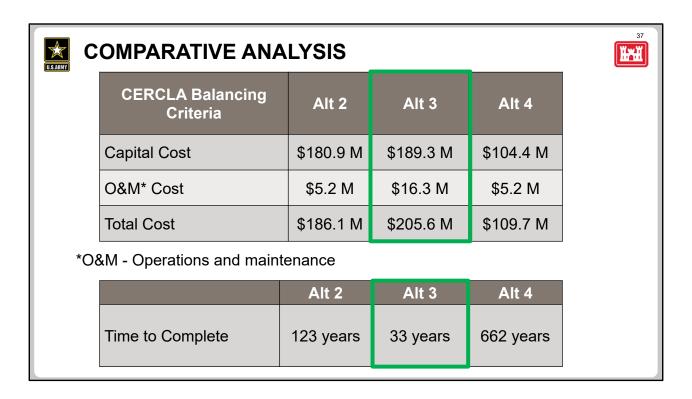
In Site-Wide Alternative 4, Building 1, pointed to in light blue, is decontaminated using scarification. Building 35, pointed to in black, is not addressed because the soils beneath the building are not above the preliminary remediation goal for the construction worker. The remaining buildings, indicated with darker blue building numbers, are dismantled and disposed of off-site.



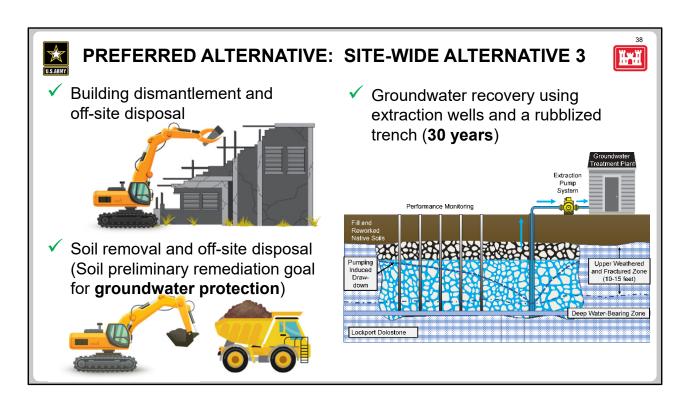
In Site-Wide Alternative 4 contaminated soil is removed to the soil preliminary remediation goal for protection of the construction worker and disposed of off-site. In this alternative approximately 5,000 cubic yards of soil are estimated to be excavated and disposed of off-site. You can see that the purple area indicating soil to be remediated is much less than in Sitewide Alternatives 2 and 3.

COMPARATIVE ANALYSIS				ĭ.×
CERCLA Balancing Criteria	Alt 2	Alt 3	Alt 4	
Long-term Effectiveness & Permanence	High	High	Moderate	
Reduction of Toxicity, Mobility or Volume through Treatment	Low	Moderate	Low	
Short-term Effectiveness	Moderate	Moderate	Moderate	
Implementability	Moderate	Low	High	

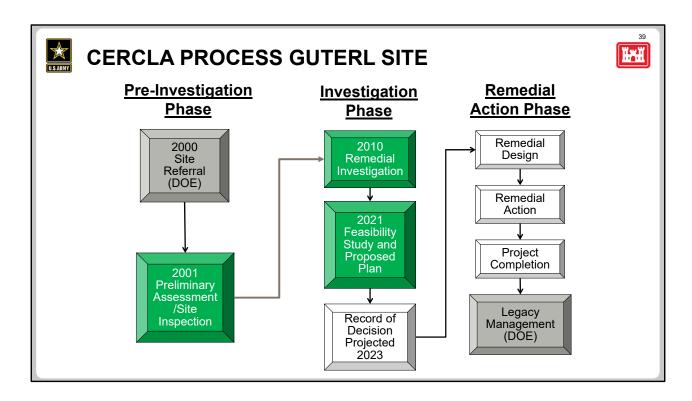
This and the next slide show our analysis of each alternative in the feasibility study against the balancing criteria. High represents a favorable rating whereas Low represents the least favorable rating. The ranking for our preferred alternative is highlighted with a green box. Alternative 3 is our preferred alternative because of its higher rankings in long-term effectiveness and reduction of toxicity through treatment of the groundwater.



This slide covers the cost comparison and the amount of time each alternative would take to complete if implemented. Our preferred alternative costs more but takes much less time to complete. Building dismantlement and soil remediation actions will take approximately two years. The time difference is mostly attributed to the inclusion of active groundwater treatment in Alternative 3. It will take approximately 30 years for the uranium concentrations in groundwater to achieve the EPA's maximum contaminant level for community drinking water sources.

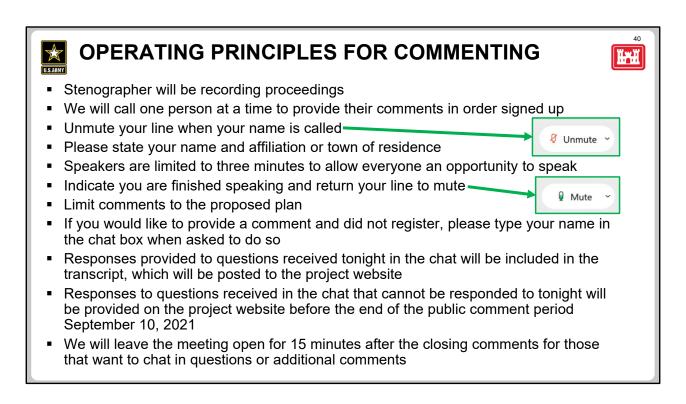


To review, Alternative 3 is the preferred alternative in the proposed plan. Under this alternative, Buildings 1, 2, 3, 4/9, 5, 6, 8, 24 and 35 are dismantled and disposal of off-site; approximately 58,000 cubic yards of soil would be excavated and disposed of off-site; groundwater is recovered using extraction wells and a rubblized trench and treated in an above ground treatment plant; environmental monitoring would be performed. An approximate total time frame for the preferred alternative is 33 years, which includes dismantlement, excavation and groundwater remediation.



Once the comment period closes, we will consider the comments received and develop a record of decision. The preferred alternative may be modified based on any new information acquired during the designated public comment period. Responses to comments received will be provided in the record of decision, which will identify the selected remedy to be implemented. The record of decision is scheduled to be released in 2023.

That concludes the main portion of our presentation. We will now begin the public comment portion of the meeting.



The following operating principles will be in place during the comment portion of the meeting.

To receive your comments on the proposed plan, we will be calling one person at a time in the order that you signed up to comment. Please state your name and affiliation or town of residence.

Please keep your phone line muted until your name has been called.

Please keep the subject of your comments to the proposed plan and limit your comment to under three minutes.

Please indicate when you are finished with your comment.

Questions placed in the chat box will be responded to either tonight or on the project website.

If you did not sign up early to provide comments tonight and you would like to provide a comment, please use the chat feature when asked to do so to type in your name and indicate that you would like to comment.

We will leave the meeting open for 15 minutes after the closing comments for those that want to chat in questions or additional comments.



FOR MORE INFORMATION



Phone: 800-833-6390 (Option 4)

E-mail: fusrap@usace.army.mil

(Sign up for *News from the Corps* emails)

Project Website:

https://www.lrb.usace.army.mil/Missions/HTRW/FUSRAP/Guterl-Steel-Site/

Administrative Record available on project website

These are the ways and places you can receive additional information about the site. We have an electronic mailing list that we use to send out the latest information regarding our progress at the site. There are additional documents that support the proposed plan available Administrative Record link on the project website.



WRITTEN COMMENTS



Email your comments by close of business September 10, 2021, to:

fusrap@usace.army.mil (**Encouraged**)

Written comments should be postmarked by September 10, 2021, and mailed to:

U.S. Army Corps of Engineers, Buffalo District Environmental Project Management Section 1776 Niagara Street Buffalo, NY 14207-3199

Please include "Guterl Site" in the subject line.

If you did not provide your comments tonight and you would like to provide comments, please either email fusrap@usace.army.mil or submit written comments through the mail by September 10, 2021. We encourage you to email your comments since COVID-19 restrictions may delay our receipt of postal mail. I will leave this slide up for a few minutes. If you have any questions, please use the chat function to send them to us. We will be leaving the meeting open for fifteen additional minutes to give you time to send us your questions. The answer will be posted to our project website at a later date. Thank you for attending this virtual meeting. Please enjoy the rest of your evening.