

**Romano, David LRB**

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**Sent:** Thursday, February 24, 2005 10:00 AM  
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**Subject:** Re: CMSA Pad Fact Sheet and Radiological Data / CMSA Pad Health and Safety PI...

Hi Dave,

Thanks for the information regarding the CMSA Pad removal. I would like to submit the following comments:

The results from the isotopic soil analysis seem to indicate that USACE only looked for Uranium, Thorium and Radium and other isotopes in the decay series, which are accepted as being the main radiological contaminants of concern on the LOOW site. I know Tom Papura has read the 1983 Oak Ridge radiological survey report for H' ( he told the RAB Technical Committee so at our last meeting), so am surprised he does not appear to be considering the potential presence of other radiological contamination on this particular vicinity property. I am concerned that the past incineration of waste in the South-eastern portion of the property, most likely from the Knolls Atomic Power Laboratory, could have resulted in contamination of soil and water on the property. I do not understand why the available evidence, which identifies the presence of a variety of fission products on vicinity property H', has not resulted in more stringent worker health and safety measures when soil is being disturbed on the property.

Extract from the report:

Radionuclide Concentrations in Surface Soil.(P.9)

"The highest Radium-226 concentration 1750 pCi/g was in sample B6. This sample consisted primarily of a black material resembling an ash residue from incineration. Sample B2 contained 1480pCi/g of Uranium-238 and 66pCi/g of Uranium-235, but only 2.14 pCi/g of Radium-226. Cesium-137 concentrations were also elevated in many of these samples. Samples B6 and B18 contained the highest Cesium-137 levels of 27.1 pCi/g and 33.0 pCi/g respectively. Strontium-90 concentrations in these samples were 9.71 and 1.29 pCi/g, respectively. Thorium-232 levels were either in the range of the baseline samples or below detection sensitivities. Sample B18 also contained 13.3 pCi/g of Cobalt-60. Sample B18 was also analyzed for Plutonium-239; the concentration of this radionuclide was 0.30 pCi/g with an error of 0.26 pCi/g. Because of the large error associated with the result, this analysis should not be considered evidence that Plutonium-239 is present in the residues on property H'."

Surface soil levels due to past fallout from nuclear weapons testing:

Strontium-90 is found at 0.1 pCi/g  
 Cobalt-60 is found in trace amounts  
 Plutonium-239 0.01 to 0.1 pCi/g

The past remediation work carried out by AEC in the early 70's, then DOE in 1983/84 does not give me confidence that the radiological contamination problems on vicinity property H' have been adequately investigated or remediated.

Regarding Potential Responsible Party Process under 5.3, it states, "This USACE process does not preclude potential regulator enforcement against private PRP's to perform the cleanup". Does this mean, once responsibility is agreed, USACE intends to ensure cleanup in those areas of LOOW, for which other PRPs are responsible?

Ann