



**US Army Corps
of Engineers.**
Buffalo District

SCOPING INFORMATION

**Niagara Falls Storage Site
Building 401 Demolition
Niagara County, New York**

Formerly Utilized Sites Remedial Action Program



September 2009

**U.S. Army Corps of Engineers
Buffalo District
1776 Niagara Street
Buffalo, New York 14207-3199**

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1. INTRODUCTION

1.1 The National Environmental Policy Act (NEPA) directs Federal agencies to initiate "an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to the proposed action." U.S. Army Corps of Engineers (USACE)-Buffalo District has prepared this scoping information to coordinate with potentially interested Indian nations, Federal, State and local agencies, and the general public; to clearly define the environmental issues and alternatives that should be examined; and to identify Federal, State and local requirements that may need to be addressed prior to the commencement of a Federal action.

The purpose of this scoping document is to inform interested Indian nations, agencies, organizations and the general public of proposed demolition activities at the Niagara Falls Storage Site (NFSS) and to elicit their concerns and recommendations. Additionally, USACE-Buffalo District is using this process as a means to facilitate the review and consultation requirements of those environmental protection statutes that are applicable and relevant to the proposed Federal action.

2. PURPOSE

2.1 Overview. In 1941, the Department of Defense (DoD) purchased 7,500 acres of land in Niagara County, New York on which was built the former Lake Ontario Ordnance Works (LOOW), for the purpose of manufacturing trinitrotoluene (TNT) during World War II. TNT production, production support, and storage areas were constructed on approximately 2,500 acres. The remaining 5,000 acres, located to the west of the production area, were left undeveloped. During World War II, the Army manufactured TNT for about nine months at a facility on the site, which included a power plant, hospital, fire department, water supply system, and waste treatment system.

2.2 The TNT plant was decommissioned in 1943. In 1945, 5,000 acres outside the production areas were declared excess and transferred to General Service Administration for disposal to private landowners. The remaining land was used by various government agencies. As DoD operations decreased, additional property was sold. Current owners of the former LOOW site include the Lewiston-Porter Schools, Federal and local governments, and private citizens and corporations.

2.3 In the 1940s, approximately 1,500 acres in the southern portion of the LOOW production area were transferred to the USACE-Manhattan Engineering District (MED), which later became the Atomic Energy Commission (AEC) and then the Department of Energy (DOE). From the 1950s through the 1980s, this area was used for various activities including the production of high-energy fuel, and storage of radioactive materials during the development of the atomic bomb. Of the original 1,500 acres, 191 acres are still owned by the DOE and is known as the Niagara Falls Storage Site (NFSS), while the remainder is owned by other entities.

2.4 Environmental investigations related to past Federal activities at the former LOOW are the responsibility of several Federal agencies. No single Federal agency has overall responsibility or authority for the entire former LOOW Site. USACE is conducting environmental investigations at the site on behalf of DoD and DOE.

2.5 Objectives. The Formerly Utilized Sites Remedial Action Program (FUSRAP) was initiated in 1974 to identify, investigate and clean up or control sites throughout the United States that became contaminated as a result of the Nation's early atomic energy program during the 1940s, 1950s and 1960s. The objectives of FUSRAP are as follows:

- Evaluate sites that supported MED/AEC nuclear work and determine whether the sites need cleanup and/or control.
- Clean up or maintain these sites so that they meet current guidelines.
- Dispose of or stabilize radioactive material in a way that is safe for public health and the environment.
- Perform all work in compliance with appropriate Federal laws and regulations and State and local environmental laws and land use requirements (to the extent permitted by Federal law).

The demolition of Building 401 will remove a severely deteriorated structure and associated solid and hazardous wastes from the NFSS FUSRAP site and permit further remediation of potential radiologically contaminated materials which may be present below the building.

3. PROPOSED PLAN

3.1 NFSS is located at 1397 Pletcher Road in the town of Lewiston, Niagara County, New York (Figures 1 and 2). The 191-acre site consists of a 10-acre interim engineered waste containment structure, a few remaining buildings, and large areas of open space (including grassland, woodlands, and wetlands). The primary use of the site from the early 1940s through the mid-1950s was for storage, trans-shipment, and disposal of radioactive waste from various sources.

3.2 Building 401 was initially the powerhouse for the production of TNT at LOOW, and it was also used to store radioactive materials in support of MED activities during World War II. It was used for the production of Boron-10, a radioactive isotope, from 1953 to 1959 and from 1965 to 1971 and then became a waste storage facility used by the AEC/DOE. In 1971, Building 401 was gutted and its instrumentation and hardware were disposed of as surplus materials. The building has been largely inactive since, and indications of bird and other animal occupation are

evident throughout. An asbestos abatement was performed on the structure in spring/summer 2002, resulting in the removal of interior asbestos-containing material (ACM). Potential exterior ACM was not included in this removal, and additional abatement activities have not yet been completed.

3.3 Building 401 is a steel-framed multi-story structure with a ridge height of approximately 76.5 feet and encompassing 100,000 square feet. The main structural system of the building consists of steel and concrete load-bearing walls supporting what may be a transite roof. The interior walls are poured concrete, concrete block, and other construction materials. The exterior appears to be comprised of sections of corrugated steel and transite siding and roofing. Inside the building, there are multiple floors, which contain rooms and offices and building service areas (boiler rooms and tower areas) (Figures 3 and 4). One tower area and high bay may be as high 75 feet or more. Additionally, Building 401 has three large concrete silos and the building floor is a concrete slab.

3.4 Environmentally sensitive deconstruction of Building 401 is the preferred plan to remove the structure as a local hazard and allow access for further remediation to potentially contaminated features such as the sumps and drains, and the buildings concrete slab. The proposed demolition work would be completed by a USACE contractor and would involve the removal and/or abatement of miscellaneous waste and debris [including bird and other animal waste; ACM and lead-based paint (LBP); potentially contaminated steel beams and rafters; and miscellaneous equipment and debris] from within Building 401, followed by the demolition of the structure. The building's concrete slab and footer would remain. The contractor would prepare and submit a Demolition Plan for approval prior to commencing work and would be responsible for all waste characterization, segregation, packaging, transport, salvage/recycling, and disposal. Surrounding soil areas with elevated radiological levels would be covered with crushed stone and geotextile fabric in order to minimize disturbance during demolition activities.

3.5 After demolition, the contractor would complete radiological surveys of the building's concrete slab surface and surrounding work areas (including a zone encompassing a 15-meter radius outside of actual work areas) and decontaminate the slab to meet free release limits for removable radioactive surface contamination. Demolition is scheduled to commence in late summer 2010.

4. ALTERNATIVES CONSIDERED

4.1 Building 401's hazardous condition limits the range of feasible alternatives to complete demolition of the structure. Stabilization of the building would be cost-prohibitive and would not address the need to remediate the site. Similarly, removal of the building with either replacement or relocation would not be economically feasible and would still incur exorbitant costs for complete remediation of the site and its structural elements. Also, it is unlikely that an appropriate steward could be identified who would assume responsibility for future maintenance

of the building. Consequently, these plans have been eliminated from consideration.

5. IMPACT ASSESSMENT

5.1 Table 1 presents a general assessment of the anticipated environmental impacts associated with the demolition of Building 401.

6. PUBLIC PARTICIPATION AND INTERAGENCY COORDINATION

6.1 Through this scoping process, stakeholders and other interested parties are invited to provide their comments on the proposed building demolition. Potential social, economic and environmental benefits and adverse impacts to the quality of the human environment will be considered. Interested parties are welcome to contact USACE-Buffalo District to discuss their views and recommendations regarding this proposed action or submit them in writing as described in Section 8.

7. COMPLIANCE WITH ENVIRONMENTAL PROTECTION STATUTES

7.1 Numerous environmental laws and executive orders influence and guide the planning, development and management of Federal programs. Table 2 presents a list of environmental protection statutes, executive orders, etc. that are normally considered. Therefore, an additional goal of this scoping process is to consult with appropriate agencies and other interested parties pertaining to resources protected by these mandates. The dissemination of this scoping information initiates applicable coordination and consultation requirements required under their provisions.

7.2 Some important Federal environmental protection statutes that will be specifically addressed include:

- a. *National Environmental Policy Act (NEPA)*. Under the provisions of 33 CFR 230.9(p), the proposed project is categorically excluded from NEPA documentation. This regulation exempts the “disposal of existing buildings and improvements for off-site disposal,” provided that the activity, when considered individually and cumulatively, will not result in any significant adverse effects on the quality of the human environment.
- b. *Clean Air Act*. Continuous air sampling and monitoring during abatement/demolition activities would be used to ensure that operational emissions of criteria pollutants would not exceed National Ambient Air Quality Standards.
- c. *Clean Water Act*. Since the proposed project will not disturb an area equal to or greater

than one acre, a construction activity stormwater permit will not be required. However, the contractor will be required to develop and implement a water management plan that would employ appropriate methods to manage surface water runoff, runoff from staging areas, and water generated during decontamination activities. The contractor will be responsible for obtaining all required discharge permits.

- d. *Resource Conservation and Recovery Act; Toxic Substances Control Act.* All regulated hazardous wastes will be managed in accordance with these statutes.
- e. *Emergency Planning and Community Right-to-know Act.* USACE and the contractor will ensure that all transportation operations comply with this Act.
- f. *Endangered Species Act.* In accordance with Section 7 of this Act, USACE-Buffalo District is requesting information from the U.S. Fish and Wildlife Service (USFWS) and NYSDEC on any listed or proposed species or designated or proposed critical habitat that may be present in the project area. Review of the most recent Federally Listed Threatened and Endangered Species and Candidate Species in New York (<http://www.fws.gov/northeast/nyfo/es/CountyLists/NiagaraDec2006.htm>) indicates that, based on best available information, the eastern prairie fringed orchid (Threatened) is known to occur in Niagara County. No records of the occurrence of this species in the project area have been noted to date and, given the location and scope of the proposed project, no effects are anticipated.
- g. *Migratory Bird Treaty Act of 1918; Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds.* Although the demolition of Building 401 is expected to eliminate nesting sites for barn swallows and roosting areas for turkey vulture, no measurable negative effect on migratory bird populations is likely.
- h. *National Historic Preservation Act.* Under Section 106 of this Act, USACE initiated consultation with interests who were likely to have knowledge of, or concern with, historic properties that may be present within the proposed undertaking's area of potential effect. These parties included the Tuscarora Nation, New York State Office of Parks, Recreation and Historic Preservation (State Historic Preservation Office – SHPO) and Town of Lewiston Historic Preservation. During the course of this consultation, the SHPO expressed the opinion that the former LOOW is eligible for listing in the National Register of Historic Places for its association with World War II and the Manhattan Project. Considering this historic status, the SHPO concluded that the demolition of Building 401 would have an adverse effect on this historic property

In continuation of this consultation, the following parties will formally be notified of the determination of adverse effect and will be offered the opportunity to present their views on a mitigation plan to resolve these effects:

Tuscarora Nation
U.S. Department of Energy- Office of History and Heritage Resources
U.S. Department of the Interior-National Park Service
New York State Office of Parks, Recreation and Historic Preservation (State
Historic Preservation Office)
Town of Lewiston Historic Preservation
Niagara County Historical Society
Atomic Heritage Foundation
Preservation Buffalo Niagara

8. POINT OF CONTACT

8.1 Interested parties are encouraged to contact USACE-Buffalo District with their comments and recommendations concerning the proposed project. Questions or requests for additional information may be directed to:

William E. Butler III
Environmental Protection Specialist
Environmental Analysis Section

Telephone No.: 716-879-4268
Fax No.: 716-879-4396
E-mail: william.e.butler@usace.army.mil

Please submit any comments or recommendations in writing to Mr. Butler's attention at the following address:

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

Thank you for your involvement in this project.

Table 1. Impact Assessment

RESOURCE/IMPACT	ENVIRONMENTAL EFFECT
Noise	Short-term localized increase due to the operation of demolition and transportation equipment. No sensitive receptors have been identified in the project area.
Displacement of People	No effect.
Aesthetic Values	Short-term degradation during demolition operations. Removal/disposal of vacant building.
Health and Safety	<p>The removal and proper disposal of ACM, lead-based paint (LBP), and radioactive residual materials would mitigate the potential human health risks. ACM and LBP abatement would be performed in accordance with appropriate and relevant Federal, State and local regulations. The contractor or their subcontractor(s) would be licensed for ACM and LBP abatement in New York and would be required to implement approved abatement plans including air sampling and monitoring, respiratory protection, and protective equipment plans.</p> <p>The contractor would also be required to implement a radiation protection plan to address the potential of encountering radioactive residuals during ACM and LBP abatement and building demolition activities. A certified health physicist would prepare a site radiation risk evaluation and develop a radiation protection plan that complies with all applicable standards and requirements. Air monitors would be installed for environmental monitoring and radiological surveying would be required prior to the release of equipment and materials from the site.</p> <p>Building demolition may cause pathogens contained in bird, bat and rodent droppings to become airborne in the breathing zone. Proper safety measures, such as personal protective equipment and water saturation, would be used to minimize risks to health and safety.</p>
Community Cohesion	ACM and LBP abatement and building demolition would contribute towards the overall remediation of the NFSS and the potential positive effects of the remediation on the cohesion of surrounding communities.
Desirable Community Growth	Contribution to overall site remediation would contribute slightly to the area's capacity for desirable community growth.
Environmental Justice	No effect on minority or low-income communities.
Tax Revenues	No effect.
Property Values	No effect.
Public Facilities & Services	All overhead electrical lines and utility poles and underground utilities would be protected during work activities.
Transportation	No roads would be blocked with equipment or materials.
Cultural Resources	The proposed demolition of Building 401 would result in an adverse effect on the former Lake Ontario Ordnance Works, a historic property that the State Historic Preservation Office (SHPO) considers eligible for listing in the National Register of Historic Places. Consultation with the SHPO and other potentially interested parties is underway to develop an agreeable plan to resolve these adverse effects.
Desirable Regional Growth	No effect.
Employment/Labor Force	Short-term increase in employment opportunities during work activities.
Business & Industrial Activities	No effect.
Displacement of Farms	No effect.
Man-Made Resources	No effect.
Natural Resources	Consumption of fuel and water during work activities.

Table 1. Environmental Impact Assessment (cont'd).

RESOURCE/IMPACT	ENVIRONMENTAL EFFECT
Air Quality	Short-term and minor increase in the release of fugitive dust from road surfaces and air pollutants associated with fuel combustion during work activities. Dust from demolition debris would be controlled with water sprayers or other approved methods. Water would be misted over all surfaces, including roads, for dust control. Continuous air sampling and monitoring during abatement/demolition activities would be used to ensure that operational emissions of criteria pollutants would not exceed National Ambient Air Quality Standards.
Water Quality	All sumps and drains will be emptied then plugged to prevent decontamination agents or contaminated debris from entering the drains and migrating off-site. The contractor will prevent surface water from the work area from entering existing stormwater or sanitary sewers and from leaving the work area surrounding Building 401. Any water collected during the work activities would be contained, sampled, analyzed and disposed of in accordance with Federal, State and local requirements. The primary analytes of concern are radiological and metallic inorganics.
Fish & Wildlife Resources	Short-term avoidance of the project area by local wildlife species during work activities. Removal of the building would permanently eliminate it as a nesting and/or roosting site for barn swallows, bats, and turkey vultures; and nesting and feeding site for raccoons and rodents.
Threatened or Endangered Species	No effect.
Vegetation	Work activities will necessitate the destruction of existing vegetation (i.e., grasses, reeds, vines, and some small shrubs) around the building, at project staging areas and along access routes. Disturbed soil surfaces would be restored with the application of either crushed stone or topsoil, seed and mulch after project completion as necessary.
Wetlands	No effect.

Table 2. Federal Environmental Protection Laws, Orders, Policies.

1. PUBLIC LAWS

- (a) American Folklife Preservation Act, P.L. 94-201; 20 U.S.C. 2101, *et seq.*
- (b) Anadromous Fish Conservation Act, P.L. 89-304; 16 U.S.C. 757, *et seq.*
- (c) Antiquities Act of 1906, P.L. 59-209; 16 U.S.C. 431, *et seq.*
- (d) Archaeological and Historic Preservation Act, P.L. 93-291; 16 U.S.C. 469, *et seq.* (Also known as the Reservoir Salvage Act of 1960, as amended; P.L. 93-291, as amended; the Moss-Bennett Act; and the Preservation of Historic and Archaeological Data Act of 1974.)
- (e) Bald Eagle Act; 16 U.S.C. 668.
- (f) Clean Air Act, as amended; P.L. 91-604; 42 U.S.C. 1857h-7, *et seq.*
- (g) Clean Water Act, P.L. 92-500; 33 U.S.C. 1251, *et seq.* (Also known as the Federal Water Pollution Control Act; and P.L. 92-500, as amended.)
- (h) Coastal Zone Management Act of 1972, as amended, P.L. 92-583; 16 U.S.C. 1451, *et seq.*
- (i) Comprehensive Environmental Response, Compensation, and Liability Act of 1980, P.L. 96-510, amended by Superfund Amendments and Reauthorization Act of 1986, P.L. 99-499; 42 U.S.C. 9601-9675.
- (j) Endangered Species Act of 1973, as amended, P.L. 93-205; 16 U.S.C. 1531, *et seq.*
- (k) Estuary Protection Act, P.L. 90-454; 16 U.S.C. 1221, *et seq.*
- (l) Federal Environmental Pesticide Control Act, P.L. 92-516; 7 U.S.C. 136.
- (m) Federal Water Project Recreation Act, as amended, P.L. 89-72; 16 U.S.C. 460-1(12), *et seq.*
- (n) Fish and Wildlife Coordination Act of 1958, as amended, P.L. 85-624; 16 U.S.C. 661, *et seq.* (Also known as the Coordination Act.)
- (o) Historic Sites of 1935, as amended, P.L. 74-292; 16 U.S.C. 461, *et seq.*
- (p) Land and Water Conservation Fund Act, P.L. 88-578; 16 U.S.C. 460/-460/-11, *et seq.*
- (q) Marine Mammal Protection Act of 1972, P.L. 92-522; 16 U.S.C. 1361, *et seq.*
- (r) Marine Protection, Research and Sanctuaries Act of 1972, P.L. 92-532; 33 U.S.C. 1401, *et seq.*
- (s) Migratory Bird Conservation Act of 1928; 16 U.S.C. 715.
- (t) Migratory Bird Treaty Act of 1918; 16 U.S.C. 703, *et seq.*
- (u) National Environmental Policy Act of 1969, as amended, P.L. 91-190; 42 U.S.C. 4321, *et seq.* (Also known as NEPA.)
- (v) National Historic Preservation Act of 1966, as amended, P.L. 89-655; 16 U.S.C. 470a, *et seq.*
- (w) Native American Religious Freedom Act, P.L. 95-341; 42 U.S.C. 1996, *et seq.*
- (x) Resource Conservation and Recovery Act of 1976, P.L. 94-580; 7 U.S.C. 1010, *et seq.*
- (y) River and Harbor Act of 1899, 33 U.S.C. 403, *et seq.* (Also known as the Refuse Act of 1899.)
- (z) Submerged Lands Act of 1953, P.L. 82-3167; 43 U.S.C. 1301, *et seq.*
- (aa) Surface Mining and Reclamation Act of 1977, P.L. 95-89; 30 U.S.C. 1201, *et seq.*
- (bb) Toxic Substances Control Act, P.L. 94-469; 15 U.S.C. 2601, *et seq.*
- (cc) Watershed Protection and Flood Prevention Act, as amended, P.L. 83-566; 16 U.S.C. 1001, *et seq.*
- (dd) Wild and Scenic Rivers Act, as amended, P.L. 90-542; 16 U.S.C. 1271, *et seq.*

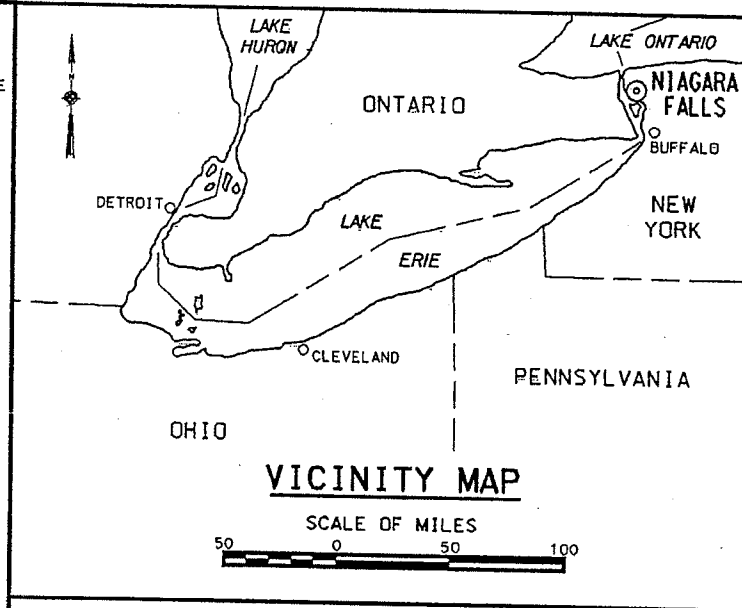
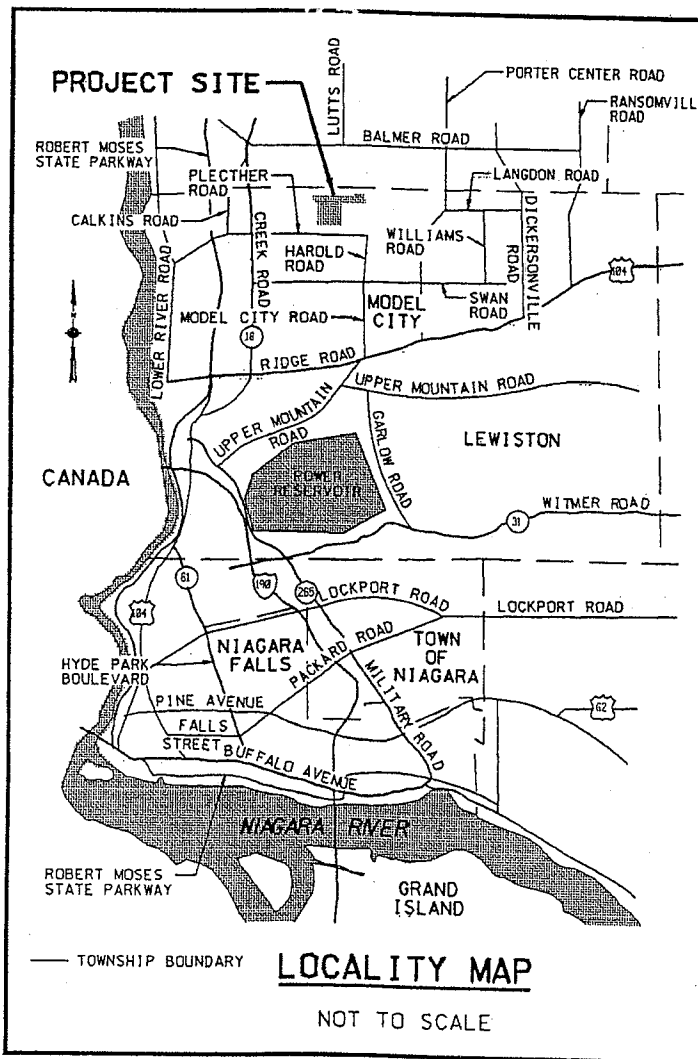
2. EXECUTIVE ORDERS

- (a) Executive Order 11593, Protection and Enhancement of the Cultural Environment. May 13, 1979 (36 FR 8921; May 15, 1971).
- (b) Executive Order 11988, Floodplain Management. May 24, 1977 (42 FR 26951; May 25, 1977).
- (c) Executive Order 11990, Protection of Wetlands. May 24, 1977 (42 FR 26961; May 25, 1977).
- (d) Executive Order 11514, Protection and Enhancement of Environmental Quality, March 5, 1970, as amended by Executive Order 11991, May 24, 1977.
- (e) Executive Order 12088, Federal Compliance with Pollution Control Standards, October 13, 1978.
- (f) Executive Order 12372, Intergovernmental Review of Federal Programs, July 14, 1982.
- (g) Executive Order 12856, Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements, August 3, 1993.
- (h) Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, February 11, 1994.
- (j) Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks, April 21, 1997.

Table 2. Federal Environmental Protection Laws, Orders, Policies (cont'd).

3. OTHER FEDERAL POLICIES

- (a) Council on Environmental Quality Memorandum of August 11, 1980: Analysis of Impacts on Prime or Unique Agricultural Lands in Implementing the National Environmental Policy Act.
- (b) Council on Environmental Quality Memorandum of August 10, 1980: Interagency Consultation to Avoid or Mitigate Adverse Effects on Rivers in the National Inventory.
- (c) Migratory Bird Treaties and other international agreements listed in the Endangered Species Act of 1973, as amended, Section 2(a)(4).



NIAGARA FALLS STORAGE SITE
NIAGARA FALLS, NEW YORK
LOCALITY AND VICINITY
MAPS
U.S. ARMY ENGINEER DISTRICT BUFFALO
FEBRUARY 2002

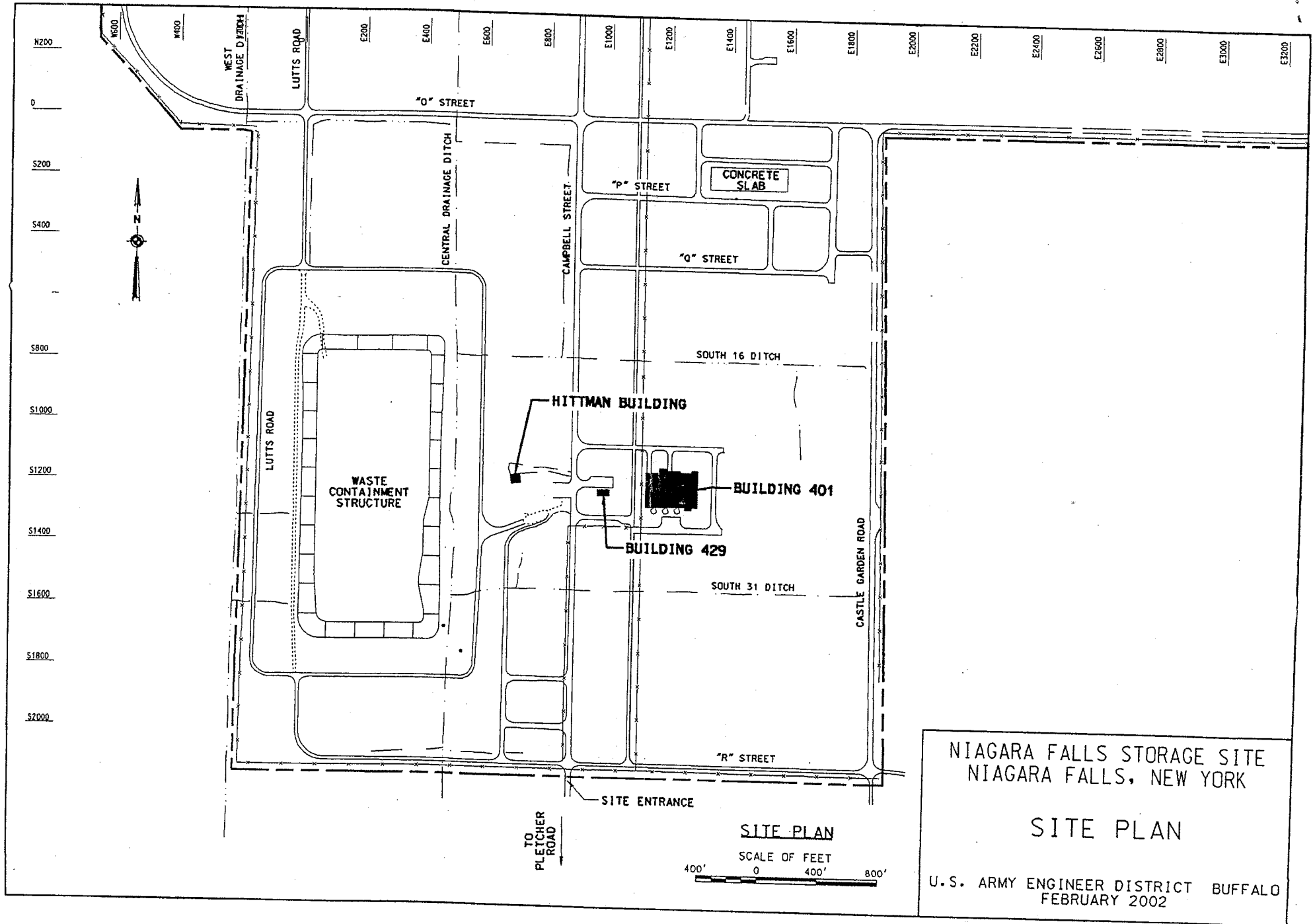
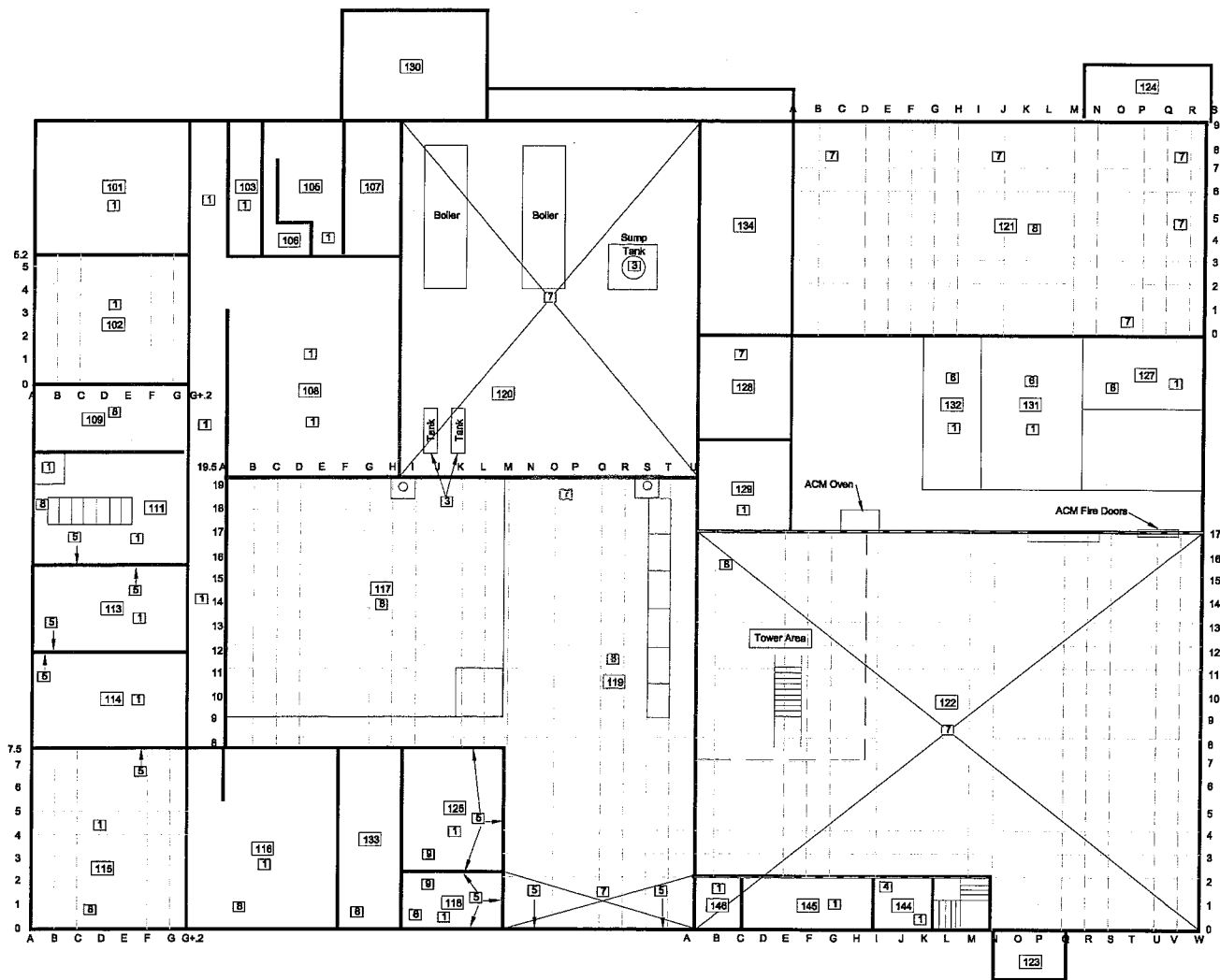


FIGURE 2



Building 401 - 1st Floor Plan
NTS

General Notes

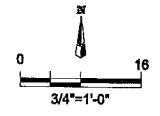
1. See table one for asbestos containing material (ACM) types and quantities per room location.
2. ACM pipe insulation located above first floor ceilings of location 101, 102, 109, 103, 105, 107, 108. See location 250 on sheet ACML-02.
3. ACM pipe insulation located in chase walls at locations 106, 105, 107.

Legend

- 1 ACM 9"x9" Floor Tile and Mastic and associated Cove Base
- 2 ACM Boiler Insulation
- 3 ACM Tank Insulation
- 4 ACM Bagged Material/Debris
- 5 ACM Transite Wall Panels
- 6 ACM Transite Wall / Ceiling Panels
- 7 Thermal System Insulation Debris
- 8 ACM Pipe and/or Fitting Insulation
- 9 ACM Transite Pipe 10" Ø

1 Square Meter Grid Lines
(Approximate 11 FT²)

122 Room Number
NTS Not To Scale



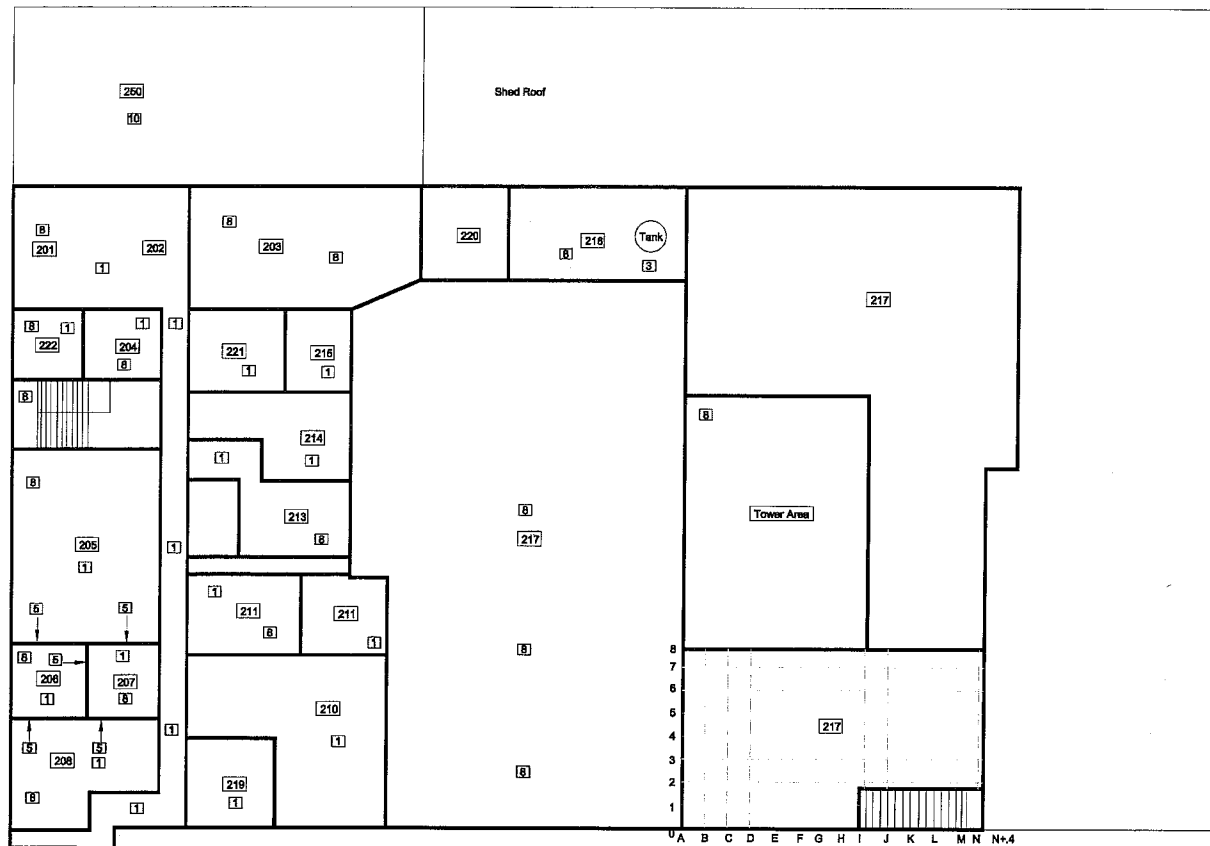
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Building 401 First Floor
Asbestos Containing Material
Location Plan
Niagara Falls Storage Site
Niagara Falls

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Figure ACML-01

FIGURE 3



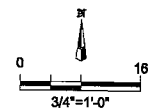
Building 401 - 2nd Floor Plan
NTS

General Notes

1. See table one for asbestos containing material (ACM) types and quantities per room location.
2. ACM pipe insulation located in Chase Walls at Locations 214, 213.

Legend

- 1 ACM 9"x9" Floor Tile and Mastic and associated Cove Base
- 2 ACM Boiler Insulation
- 3 ACM Tank Insulation
- 4 ACM Bagged Material/Debris
- 5 ACM Transite Wall Panels
- 6 ACM Transite Wall / Ceiling Panels
- 7 Thermal System Insulation Debris
- 8 ACM Pipe and/or Fitting Insulation
- 9 ACM Transite Pipe 10" Ø
- 10 ACM Pipe and/or Fitting Insulation above First Floor Ceiling
- + 1 Square Meter Grid Lines (Approximate 11 FT²)
- 122 Room Number
- NTS Not To Scale



JE JACOBS

Building 401 Second Floor
Asbestos Containing Material
Location Plan

Niagara Falls Storage Site
Niagara Falls

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Figure ACML-02