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Seaway - 580

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New York State Department of Environmental Conservation

Division of Solid and Hazardous Materials
Bureau of Radiation & Hazardous Site Management
Radiation Section, Room 402
50 Wolf Road, Albany, New York 12233-7255
Phone: (518) 457-2225 FAX: (518) 485-8390



December 11, 1998

[Redacted] J. [Redacted], [Redacted]
U.S. Army Engineering District, Buffalo District
1776 Niagara Street
Buffalo, New York 14207-3199

Re: Seaway FUSRAP Site

Dear [Redacted]:

This letter transmits the New York State Department of Environmental Conservation's comments on the draft documents, Quality Assurance Project Plan For Additional Surface Characterization at the Seaway Site Areas B & C (December 8, 1998) and Sampling And Analysis Plan For Additional Surface Characterization at the Seaway Site Areas B & C (December 8, 1998). These two documents along with a three page overview was received by myself electronically on December 9, 1998.

Below are our comments that resulted from our necessarily brief review.

Boogram

must pick and choose and then must increase the number of samples

Comment 1: Section 2.3.1.2, Sample Intervals: The soil sample interval, 0 to 2 feet below ground surface (bgs) and 2 to 4 feet bgs is too large. The soil sample interval should only be 6 inches, which is the accepted practice. Having a larger soil sample interval will only dilute the radioactive components, resulting in a false interpretation concerning the distribution of radioactive material.

Comment 2: Section 2.3.2.3, Field Measurement Procedures and Criteria: Care should be taken to perform the field screening for gamma radioactivity in a non-contaminated area (lowest background), especially since background will be subtracted.

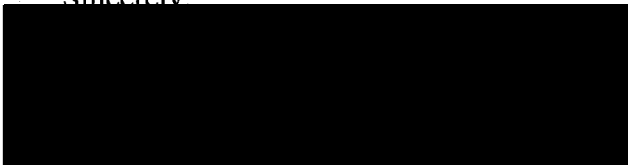
Comment 3: Section 5.2, IDW Collection and Containerization, states "Decontamination fluids will be collected and drummed/contained. Characterization of decontamination fluids generated during the project will be accomplished at a later date once a change order has been issued for the sampling and analysis of the decontamination fluids." This should be done as expeditiously as possible since we are now into freezing weather.

bring to Atland 2
- extremely low level
- same source
- use 25 dust can

SEA_0512

Thank you for the opportunity to comment on this plan. If you have any questions or need further information, please contact me at the above telephone number.

Sincerely



Environmental Radiation Specialist
Bureau of Radiation & Hazardous Site Management
Division of Solid & Hazardous Materials

cc: [redacted], USACE
[redacted], USACE
[redacted] NYSDOH
[redacted], Erie Co. Dept. of Environmental Planning