

**New York State Department of Environmental Conservation**

**Division of Solid and Hazardous Materials**

**Bureau of Radiation & Hazardous Site Management, Room 460**

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**MAY 25 2001**

[Redacted]

Project Manager, Seaway FUSRAP Site  
U. S. Army Engineering District, Buffalo District  
1776 Niagara Street  
Buffalo, New York 14207-3199

[Redacted]

Re: Seaway FUSRAP Site - Areas A, B and C  
Sampling and Analysis Plan, Volume 1 and 2 (April 2001)  
Site Safety and Health Plan (April 2001)

This letter transmits the New York State Department of Environmental Conservation's comments on the United States Army Corps of Engineers' *Sampling and Analysis Plan, Volume 1 and 2 Seaway Site - Areas A, B and C* and the *Site Safety and Health Plan, Seaway Site - Areas A, B and C, Tonawanda, New York, April 2001*. Our comments are enclosed.

If you have any questions or would like to discuss this further, please contact

[Redacted]

Sincerely,

[Redacted Signature]

Director  
Bureau of Radiation & Hazardous Site Management  
Division of Solid & Hazardous Materials

Enclosure

cc: [Redacted], [Redacted]  
[Redacted], USEPA  
[Redacted], NYSDOH  
[Redacted], Erie Co. Dept. of Environmental Planning

JM/

**New York State Department of Environmental Conservation  
Division of Solid & Hazardous Materials  
Bureau of Radiation & Hazardous Site Management**

**Comments on the  
Sampling and Analysis Plan, Volume 1 and 2 Seaway Site - Areas A, B and C  
Tonawanda, New York (April 2001)**

May 25, 2001

- Comment 1: Within this document there are several references as to how the borings will be constructed, some of which are not the same. An in-depth discussion should be presented as early as possible to avoid conflicts within the various discussions. For example, the first reference to borings in Section 1.3.1, subsection 1, Correlation Study Effort, should refer to a section which discusses the construction of the borings. The next reference, in subsection 2, Determine Extent of Contamination in Areas B and C (Phase I), says that all borings will be constructed in the same manner and goes on to say the Rotosonic drill rig will be used to bore a hole 4 inches or larger and then a 4-inch PVC pipe will be placed in the hole prior to performing the in-hole gamma logging. In Section 2.2.2.1, Field Measurement Procedures and Criteria, the second sentence states, "The Rotosonic boreholes will be drilled and cored by simultaneously advancing two lines of drill pipe, a 4-inch inside diameter inner core barrel and a 6-inch inside diameter outer drive casing." All these discussions should be placed in one area which completely describes the installation of the boring.
- Comment 2: Within this document there are several references as to how the borings will be field measured. Several of the discussions should be merged into one section. For example, in Section 2.2.2.1, Field Measurement Procedures and Criteria, the last sentence of the second paragraph states, "Measurement of both alpha and beta-gamma radiation will be recorded for each core sample for health and safety purposes." In the next subsection, Field Measurements, the first paragraph goes on to discuss the scanning of the core with a 2X2 NaI detector. In another section, 2.2.2.2, Sample Collection for Laboratory Analyses, the first sentence states, "After retrieval, the soil core will be placed on a table covered by clean plastic sheeting. Cores will be removed from the core barrel (if a core barrel is used), measured and examined." All these ideas should be stated in one section describing how a core is to be handled in a step by step fashion, because even though the alpha, beta-gamma survey is for health and safety purposes, it will still provide valuable information for other purposes. Likewise, the work being performed on a table is an important factor, as the core is further removed from potentially contaminated surface soils. It should be also mentioned that this table will be set up in an area with no identified surface contamination.

**Comment 3:** On page 2-2, there is a description of the reference boring. The location of the reference boring must be beyond any radioactive influence.

**Comment 4:** On page 2-8, it is noted that not all borings will have soil sampling. Please identify which ones will not and explain why.