



County of Erie

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Facsimile Cover Sheet

DATE: Feb 14, 2002
TIME: 2:30 P
NUMBER OF PAGES TO FOLLOW: 2

TO: NAME: [REDACTED]

LOCATION: USACE

FAX PHONE No. 879-4194

FROM: NAME: [REDACTED]

LOCATION: **ERIE COUNTY ENVIRONMENTAL COMPLIANCE**

TELEPHONE No. **(716) 858-6370**

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SPECIAL INSTRUCTIONS: Seaway comments, sorry for the delay. I understand that DC Dooley also forwarded an email copy

[REDACTED]

MIW

Radiological and Health Physics Consulting Services

February 14, 2002

██████████, ████
Erie County Dept. of Environmental & Planning
Erie County Office Bldg.
95 Franklin Street
Buffalo, NY 14202-3973

Subject: Review of USACE Technical Memorandum: Summer 2001 Subsurface Investigation at the Seaway Site – Areas A, B and C, Tonawanda NY, dated 01/18/02. Review Draft.

Dear ██████████:

Based on my review of the subject document my comments are submitted as follows:

- In general this is a good piece of work which allows the Corps to better define the boundaries and the extent of the MED materials resident at the Seaway Site.
- p 3-2 last paragraph discusses Figure 3-1 and the correlation between the radium-226 BEGe results and the GM measurements. Without performing a least squares or similar linear regression of the data the strength of how well the data are correlated can not be determined. This also applies to the data in Figures 3.2 through 3.4 and 3.7 through 3.10. A correlation coefficient derived from a linear regression is one measure of how well the data correlates and without it is hard to believe the conclusions that have been drawn here and for the other figures listed.
- p 4-1 last ¶, last sentence: "collected" versus "collect"
- p 4-2 1st full ¶, last "...their surface survey"
- p 4-3 2nd ¶. In this ¶ you state that the calculated values because they are more conservative are used in the RESRAD runs. Does no one have any faith in the actual values measured/calculated? I can only guess that some significant level of effort was expended in coming up with the actual K_d values but in only 2 sentences its importance is negated. I am concerned that we are not using numbers closer to the reality for this particular site for this calculation. I would like to see at least a small discussion at the end of this section where the comparison of both sets of information is made. You need to make a better argument than just using RESRAD's numbers for K_d because they are more conservative, especially if this conservation cannot be demonstrated in the actual K_d data.

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Phone (716) 631-8291 Fax (716) 631-5631

2001-1556.001

Letter to [REDACTED] 2/14/02

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- p 4-5, § 4.4, 2 ¶ - last sentence "Ra-226" vs "Ra-236"
- Exhibits Volume -- Down-Hole Log Summaries
I assume that in some cases even though the counts per minute stops at 40k CPM that the reading was actually above 40KCPM. A note/explanation to that affect would be useful at the front of this section. Refer readers to Exhibit D for actual values, also what does the "—" sign mean between the listed concentrations for Ra-226, Th-230, U-238? If it's just a place holder that should also be explained on this cover/information sheet. Same issue with the data qualifiers listed.
- Exhibit E - Why are error numbers listed for the K-40 blanks when all values are negative and the data qualifiers are "U's" when real data with a "U" qualifier has no associated error. A footnote at the end of the Exhibit might be useful.
- Exhibit G - Suggest adding a footnote that states "Shaded numbers are suspected areas of MED-related material."

Should you have any questions regarding the above comments, please contact me at your convenience.

Very truly yours,

MJW Corporation Inc.

[REDACTED]
President

DAD:tb

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