Responses to Comments Provided to SAIC Regarding Seaway Site Dated February 25, 1999
From
[redacted]

[redacted] Comment	Response
Today, I attended SAIC's presentation discussing the FUSRAP radioactive waste clean-up at the Seaway Landfill located in Tonawanda, NY. As a concerned citizen interested in applying the highest standards to clean-up radioactive waste, I would appreciate answers to the following questions:	USACE would like to thank you for your comments and your expressed interests in the FUSRAP activities as a concerned citizen. Although your questions were directed to SAIC, the responses will be from USACE since SAIC is under contract to USACE for the Seaway Site activities.
1. Is FUSRAP waste the same as MED waste? If not, what are the differences	For the Tonawanda Sites, FUSRAP waste and MED waste are the same. They are the same for most of the sites to be addressed by FUSRAP, which were sites where MED-related activities were conducted. However, Congress can and has added sites to FUSRAP that were not directly associated with the MED activities. One such site is the Colonie Site near Albany, New York.
2. Has your company concluded that there is no FUSRAP or MED waste, located in the upper portion of the landfill, behind sections A,B&C, and farthest from the river? What reports were used to reach this conclusion?	One element of the FUSRAP is to investigate possible sites based on historical information as well as field sampling and surveys to determine if any MED-related activities were conducted and whether there is any MED-related contamination present. The Department of Energy (DOE) had the responsibility for this program until October 1997 when Congress transferred the responsibility for the remaining sites to be remediated to USACE. The Seaway Site had been investigated by the DOE and the results summarized and documented in the Remedial Investigation report dated 1993. (BNI (Bechtel National Incorporated) 1993. *Remedial Investigation for the Tonawanda Site*. DOE/OR21949-300, Oak Ridge, TN.) Based on their review of the historical information and field surveys, the DOE concluded that only the areas now known as Areas A, B, C and D are contaminated with MED-related Materials. Based on their review results, the FUSRAP was to address only Seaway Areas A, B, C, and D. Area D is being addressed with the remediation of Ashland 1 and was included in the Record of Decision for the Ashland Sites.
3. Has anyone taken air samples to measure radon gas concentrations above background level in areas A, B&C? If so, how do these measurements compare to those taken in the large portion of the landfill, behind sections A, B, &C, and farthest from the river? Also, how do these measurements compare to others, taken at landfills around the United States, that are	USACE is not aware of any radon sampling done in the Seaway Areas A, B, and C as part of the FUSRAP activities. As far as comparing any results to landfills that contain no radioactive materials that are MED-related or man-made as in consumer products, USACE is not aware of any typical landfills that would not have consumer products in them that contain radioactive

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known, not to contain radioactive wastes, either FUSRAP or MED, or man-made from production of commercial or consumer products?	materials.
4. If clean-up solution #2 were implemented, does your company conclude that sections A, B, and C could be designated "unrestricted use"? Would this designation be suitable for growing crops? Would fencing and hazardous waste danger signs need to be posted around the entire landfill?	Cleanup using Alternative 2, Complete Excavation with Off-site Disposal, would provide for a site with no further radiological restrictions; however, USACE would not recommend growing crops at the site even in the absence of all MED-related waste. Neither fencing nor signage would be necessary for the residual MED-related radiological materials, however, they may be needed for the other Non-MED wastes remaining in the landfill.
5. If clean-up solution #6 were implemented, would the 5' cap to cover sections A, B&C be vented or not vented?	The areas may or may not need to be vented. That is dependent on what others materials were disposed in those areas and whether methane gas production is likely. BFI and NYSDEC will make the determination as to what needs to be vented. If venting is required, it could be passive venting (i.e., not connected to an active venting system where air is pulled out through a stack using an exhaust fan) or active venting.
6. Does your company know of any national, or international, scientific efforts underway, to render man-made radioactive wastes harmless to humans and the environment?	The radionuclides associated with MED-related materials at Tonawanda are not man-made (i.e., not derived from nuclear reactors or particle accelerators). Currently, there is no known way to render radioactive materials, both naturally occurring and man-made, non-radioactive. There are ways to protect the public and the environment from the hazards associated with radioactive materials. Protection of the public and environment is achieved by minimizing, or eliminating, the pathways for exposure to the material. Protection can be achieved by (1) isolating the materials from the environment, (2) providing protective barriers (e.g., shielding, distance, etc.) between the material and an individual, and (3) allowing the material to decay before releasing the material. The type and degree of protection necessary to be protective to the public and the environment is dependent on a number of factors, such as the type of radioactivity, the concentrations, and the form of the material, where it is located, and possible exposure mechanisms. For this reason, a radiological assessment is performed to determine what, if any, protective actions are necessary for a given site and the associated radiological materials at that site.