

New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials, Region 9
270 Michigan Avenue, Buffalo, New York, 14203-2999
Phone: (716) 851-7220 • FAX: (716) 851-7226
Website: www.state.ny.us

Raymond
USA COE



April 24, 2000

, P.E.
EnSol, Inc.
452 Third Street
Niagara Falls, New York 14301

Dear :

Town of Tonawanda Landfill, #15S29
Alternate Grading Material Proposal

I have reviewed your letter of February 25, 2000 which provides a response to my previous comments on the plan for using the excavated soils from the Buffalo Inner Harbor project as Alternate Grading Material (AGM) at the Town of Tonawanda landfill. In general, the responses provided are acceptable to the Department, however the following points are brought to your attention for further clarification:

1. URS Greiner's memorandum dated February 24, 2000 provides an itemized breakdown of the quantities of soil expected from each individual source at the Inner Harbor project site, with a total of 64,000 cubic yards of material anticipated to be generated. Half of this material (30,000 CY) is listed as coming from "Marine Work (New bulkheads and piers)." It is assumed that this material is **not** from **below the water table**, as only soils excavated from **above the water table** are acceptable for use as AGM at the Town of Tonawanda landfill in accordance with URS's stated soils management strategy. Please clarify if this interpretation is not correct.
2. Regarding the gas venting trench proposed to be installed as shown on the plan drawing included with your letter, you are reminded that until such time as a formal variance request from the gas venting requirements contained in Part 360 is submitted for the Department's review, no approval of a modified gas venting system can be granted. Therefore, the Department considers that the installation of the gas venting trench as proposed by EnSol is to be done entirely at the Town of Tonawanda's risk. During the final closure plan design for the landfill, the Department may determine that the trench system installed is inadequate and may require additional work to be completed.



5/10/2000
S. Buechi

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April 24, 2000

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3. Your response # 7 indicates that a total of approximately 210,000 cubic yards of AGM will ultimately be needed to achieve the final grades for closure of the landfill. Please clarify if this figure takes into consideration the amount of soil/waste material that is expected to be excavated from the adjacent property(s), i.e., Niagara Mohawk Power Authority property, and placed within the Tonawanda landfill footprint.
4. The Department requires that the Town submit a quarterly report that provides a detailed breakdown of the amount and source of each AGM material placed during that quarter at the landfill. A short discussion of any problems or proposed changes to the AGM placement plan should also be included in the report.
5. Each individual source of material that is proposed for use as AGM at the Town of Tonawanda landfill will be evaluated on a case-by-case basis by the Department.

If you have any questions regarding the above comments, please call either ██████████ or me at 851-7220.

Sincerely,

██

██████████, P.E.
Environmental Engineer II

DW:lj

cc: ██████████, Regional Solid Materials Engineer
██████████, Engineering Geologist II
██████████, Assistant Regional Attorney
██████████, Town of Tonawanda
██████████, USACOE