

Tonawanda 200-1d

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**New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials, Region 9**

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April 13, 2001

[REDACTED]
Project Manager
Department of the Army
Buffalo District Office, Corps of Engineers
1776 Niagara Street
Buffalo, New York 14207-3199

Dear [REDACTED]:

Town of Tonawanda Landfill, # 15S29
FUSRAP Investigation

I have reviewed the Draft Sampling and Analysis Plan dated March 22, 2001 prepared for the above referenced site under the FUSRAP activities being conducted by the US Army COE. The following comments are offered for the COE's consideration:

1. In order to fully meet the data quality objectives as outlined on page 1-5 of the Field Sampling Plan - Volume 1, specifically DQA #4, it is recommended that sampling and analysis of surface water and/or leachate at the landfill also be included. A complete assessment of the migration capability and potential risks posed to surrounding receptors must include an analysis of this migration pathway. This is especially significant as there have been documented leachate outbreaks along the northwestern slope of the landfill, in the vicinity of Target Area B, as identified on Figure 2-1. This area is located very close to the residential properties along Wadsworth Court, which directly abut the landfill on the north.


The COE should be aware that as recently as 1998 Department staff inspected the landfill to document leachate seeps along this area of the site. It was noted at that time that visually impacted surface water drained from this area along a small ditch which discharges to a wetland area to the west. Additionally, a sample of the leachate was collected by the Town of Tonawanda's engineering consultant on July 1, 1998 and analytical results are available.

2. The COE should also aware that a Leachate Treatability Study Report, dated June 2000 has been prepared for the Town of Tonawanda Landfill by Malcolm Pirnie, Inc. It is noted that this document is not listed in the references cited in Section 10 of the plan. The Leachate Treatability Study includes results for both chemical and radiological analyses of leachate and groundwater samples.

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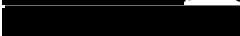

Thank you for the opportunity to comment on the draft sampling and analysis plan. If you have any questions regarding the above please call me at 851-7220.

Sincerely,

A large black rectangular redaction box covering the signature of the sender.

for Environmental Engineer II

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cc: , Regional Solid Materials Engineer
, Engineering Geologist II
, DSHM, Albany