

Tonawanda 200-4d



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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MAY 09 2001

[REDACTED], Project Manager
U.S. Department of Army
Buffalo District - Corps of Engineers
1776 Niagara Street
Buffalo, NY 14207-3199

Dear [REDACTED]:

This is in response to your letter dated March 29, 2001, requesting our comments on the Draft Sampling and Analysis Plan, Volumes 1 (Field Sampling Plan), 2 (Quality Assurance Project Plan), and 3 (Health and Safety Plan), for the Tonawanda Landfill.

Field Sampling Plan

Page 1-2: Clarify if the radionuclide guideline standards established by the DOE are the DCGLs for this site.

Page 2-10 (last paragraph) and page 2-15 (Section 2.3.2.3, 1st paragraph): These paragraphs discuss scanning with a shielded pancake GM probe, and taking a soil sample at the core segment with the highest count rate. Although the GM probe can easily distinguish the presence of certain radionuclides in excess of background, it may have difficulty identifying the segment with the highest concentrations. Based on some data from Linde, it appears that the GM probe count rates were the same (within statistical variation) for two core segments containing 15 or 25 pCi/g of radium, thus making it difficult to identify the core segment with the greatest radionuclide concentrations. This may be attributable to the particular mix of radionuclides in the Linde cores. Nevertheless, since you will be sampling the core segment with the highest count rate, we are interested in information that will demonstrate that the shielded GM pancake probe can detect and differentiate increasing radionuclide concentrations in scanning Tonawanda Landfill cores.

Page 2-15 (Section 2.5.2.3, 2nd paragraph): Discuss how the down-hole gamma logging data will be used during the investigation and later in evaluating the site. Indicate where the "Detailed Operating Procedure - Borehole Geophysical Survey" can be found. Also, Figure 2-4 indicates a 1x1 detector will be used for down-hole logging.

Table 1-1 (Summary of Data Needs Determination): Subsurface scans via core scanning and down-hole logging should be included in this table.

Quality Assurance Project Plan

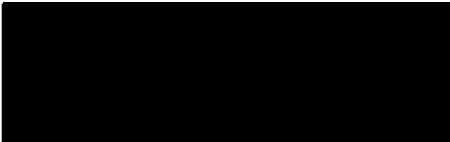
Table 3-3 (Analytical/Methods, Parameters, and Project Quantitation Limits): Am-241 should be included, as well as radiochemical separation and alpha spectroscopy for isotopic uranium.

Table 7-1 (Field Instrument Uses, Detection Limits, and Calibration): How is beta-gamma surface monitored? Field monitoring for alpha surface contamination levels is not included as an activity in the Field Sampling Plan.

Due to time limitations, the Field Standard Operating Procedures and the Health & Safety Plan were not reviewed.

We appreciate the opportunity to provide comments. We hope they are helpful to you. If you have any questions, please do not hesitate to contact me.

Sincerely,



Radiation & Indoor Air Branch