



CITY OF TONAWANDA, NEW YORK

OFFICE OF THE CITY ENGINEER

200 Niagara Street · Tonawanda, New York 14150-1099

Phone: (716) 695-8624

Fax: (716) 743-8870

██████████
Mayor

████████████████████
City Engineer

March 28, 2006

US Army Corps of Engineers
Buffalo District
1776 Niagara Street
Buffalo, NY 14207-3199

Attn: ██████████, Project Manager

Re: Tonawanda Landfill Vicinity Property Remedial investigation

Dear ██████

I have the following comments on the Remedial Investigation Report:

- 1.) Has any sampling and testing been performed on the other side of the fence from the Landfill OU in the City of Tonawanda? Dust migration is identified as a possible transport scenario. I did not see any data in the report on it.
- 2.) Why wasn't a Risk Assessment performed for the neighboring Residential Users in the City of Tonawanda? The report identifies the risk at CERCLA thresholds for the Recreational User in certain areas. Shouldn't the risk be assessed for the residents in the City of Tonawanda to assuage their concerns about residing across a fence from the MED material?
- 3.) Migration of Uranium through groundwater is identified as a possible transport scenario. The City of Tonawanda has an active 24" storm sewer that runs parallel to the City/Town fence line from Hamilton to Brookside and eventually drains to Two-Mile Creek. One of the manholes shows up on your plans near the end of Wadsworth Ave. The other manholes were probably missed or are buried. Has there been any testing performed in these manholes or at their outfall to determine if this transport scenario has occurred?
- 4.) I am concerned about the policy of leaving the MED and Americium material in place, to be covered when the landfill is capped. Rattlesnake Creek was cleaned up, which had no nearby residences. Wouldn't it make sense to remove the material which is in such a close proximity to permanent residences?

Thanks,

████████████████████
City Engineer

Cc: ██████████
██████████

TON_00252