



CITY OF TONAWANDA, NEW YORK

200 Niagara Street
Tonawanda, New York 14150
Telephone: (716) 695-8318
Fax: (716) 695-8315

Common Council

Council President

1st Ward

2nd Ward

3rd Ward

4th Ward

October 11, 2007

U.S. Army Corps of Engineers, Buffalo District
FUSRAP Public Information Center
1776 Niagara St.
Buffalo, NY 14207-3199

Subject: Proposed Plan for the Tonawanda Landfill Vicinity Property

Dear Army Corps,

This letter is a continuation of a letter I previously submitted on March 28, 2007, concerning the Proposed Plan for the Tonawanda Landfill Vicinity Property.

I disagree with the methodology that the Army Corps uses in the Remedial Investigation and the Proposed Plan with reference to the testing of core soil samples. It is my understanding, from reading all the supporting documents, that the Army Corps uses a method of "averaging" the amount of radiation throughout the entire core sample. For instance, if a 20 foot core soil sample is found to contain 2 feet worth of contamination, the subsequent 18 feet worth of "clean" soil is averaged with the 2 feet of contaminated soil to reach the overall value of concentration.

This method of "mean concentration" has a pronounced effect on the overall severity of the hot spots behind the homes along Hackett Dr. and Wadsworth Court. It also plays a major factor in the EPA Guidelines that the Army Corps uses for consideration of remediation. By "diluting" the core samples, these values fall just under guidelines for remediation instead of over those same guidelines.

Furthermore, you indicate that the level of contamination, in most cases, located behind the homes in the Riverview Heights area is in the first 1.5 feet of soil (one instance it was 11 feet down). This 1.5 feet of soil can become airborne quite easily through everyday work on closing and capping the landfill. That "magical" fence that borders the resident's property lines doesn't prevent the contamination from blowing or leaching onto their properties.

TON_00216

In addition, you've stated that the exposure rates, pre to post capping of the landfill, will be significantly better. The FUSRAP area is not within the boundaries of the landfill cap and therefore, pre-capping exposure rates will still apply. You also designate the landfill under the "recreational use" for the Exposure Cancer Risk Summary. I am asking you to reconsider that designation to "residential". With the FUSRAP area being inches away from resident's homes and Riverview Elementary School property their exposure rates are far from "recreational".

It is clear that the Army Corps is playing a numbers game to abstain from their responsibility to the residents of the 4th Ward and the students and faculty of Riverview Elementary School. In your hopes of saving a few bucks, you are messing with the health and welfare of numerous people that call "the hill" home. At this point nothing less than full remediation and core soil sampling of the surrounding properties including the school is acceptable. I thank you for your time and look forward to your response.

Sincerely,



4th Ward Councilman
City of Tonawanda