



Chemical Waste Management, Inc.

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January 11, 1989

Mr. Lee Fuerst, Project Manager  
Department of the Army  
U. S. Army Corps of Engineers  
Kansas City District  
700 Federal Building  
601 E. 12th Street  
Kansas City, MO 64106-2896

Re: COE/Acres Draft Remedial Investigation Report for Former Lake  
Ontario Ordinance Works, Lewiston/Porter, NY.

CWM Chemical Services, Inc. has reviewed the above referenced  
report and offers the following comments/recommendations:

In general, the report concludes that significant contamination  
exists in Area "A" (buried drums North of SLF-7) and in Area "B"  
(The Olin Burn Area). Further investigation and corrective action  
are indicated for these two areas. Areas "C", "North of C" and "D"  
were reported to be free of contamination and no further  
investigations were recommended. The investigation failed to find  
any TNT lines, and the report concludes that no further searching  
is warranted. CWM Chemical Services, Inc. does not agree with the  
latter recommendation and conclusion for the reasons noted below:

1. Acres installed monitoring wells MW-A-15 and MW-B-15 to  
investigate downgradient groundwater contamination  
originating from Area "A" and Area "B", respectively (see  
Figure 8-11). Both wells are screened in Zone 1 upper  
tills. MW-A-15 is located approximately 300 feet  
northwest of the buried drums of Area "A". This distance  
is too far to effectively monitor contamination from Area  
"A". On page 8-i3, Acres estimates that based on  
hydraulic properties of the upper tills, a contaminant  
front would have migrated only ten feet from the trench.  
MW-B-15 is not located downgradient from Area "B" as  
intended, based on flow paths shown on Fig. 8-11. Based  
on the above, wells MW-A-15 or MW-B-15 do not appear to  
be located properly to characterize shallow groundwater  
contamination. CWM recommends the installation of  
additional wells properly located to characterize any  
shallow groundwater contamination that may be present.
2. Geophysical investigations in Area "C" indicate the  
presence of buried metal in a feature measuring

approximately 20 feet by 200 feet (Appendex C, Fig. 5). Former employees of Olin reported a drum-filled trench of similar dimensions in the same general area (page 4-8). As described on page 5-8, Acres excavated one exploratory trench designated Test Pit C-2 in this area. No drums or other metal were found. The location of C-2 as shown on Fig. 5-2, however, does not coincide with the located recommended by the geophysical consultant in Appendix C, Fig. 5. Test Pit C-2 is located near the extreme Western end of the area of buried metal, and it may have missed the drum filled trench completely. CWM recommends that an additional exploratory trench be excavated at the location originally recommended by the geophysical consultant as shown in Appendix C, Fig. 5.

3. The investigation failed to find any TNT lines. On page 12-3, the report states that no further investigations are warranted and that the decision to do so would present a significant departure from the original scope of the investigation. No additional information on the TNT lines has been gained by this investigation, other than their nonexistence at several test pit locations. Since CWM Chemical Services, Inc. has encountered buried TNT lines during excavations for various projects and the lines are indicated on previous drawings of the site CWM recommends further investigations, such as geophysical surveys, based upon these drawings.
4. A discussion of the underground water flow between Zone 1 (Upper Tills) and Zone 3 (Silt/Sand Aquifer) is presented on page 8-10. The report concludes that the vertical component of groundwater flow is in an upward direction from Zone 3 to Zone 1. This conclusion is in direct opposition to that reached by Golder Associates in previous investigations where vertical gradients have been shown to be generally in a downward direction. Recommend this inconsistency be resolved.
5. As described on page 10-3, well MW-C-15 showed low level contamination (20 ug/l 1,2-dichloroethene). The well was intended to be an upgradient well for Area "C". The contamination, therefore, is suspected to be due to an unknown upgradient source. Further investigation to determine the source of the contamination is recommended.

CWM requests that a meeting be scheduled between the Corps of Engineers, Acres, CWM Chemical Services, Inc. and Golder Associates, our RFI contractor, to discuss the findings contained in your initial investigation report as well as future

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investigations to be conducted on CWM property. The purpose of this meeting would be to coordinate our efforts, assure comparability of data collected, and to avoid duplication. The meeting can be held at the Model City Facility.

Very truly yours,



Joseph S. Pizzuto, P.E.  
Special Projects Manager

JSP:ss

cc: Mr. John Berry, P.E., Acres  
Mr. Dana Lockwood, CWM  
Mr. John Stanulonis, CWM  
Mr. Brian Senefelder, CWM  
Mr. Ted Gabel, EPA  
Mr. Paul Counterman, DEC