

## **Acres Response to Review Comments**

### **Draft Engineering Evaluation/Cost Analysis (EE/CA)**

**Reviewer(s):** Paul R. Counterman, P.E., NYSDEC  
Andrew Bellina, P.E., USEPA

**Review Date:** December 30, 1994

**Comment #1:** Page 5-12, Section 5.2.1, Alternative 3: Under the Section C.1.a, consideration 5 acknowledges that the excavated material may require treatment prior to disposal, in accordance with Land Disposal Restrictions (LDRs) if concentrations exceed LDR values. However, in Appendix B (Excavation-Disposal) does not appear to include costs which may be necessary to reduce the concentrations of contaminants in the excavated material to LDR levels.

**Response:** Cost estimates for any treatment required prior to disposal, in accordance with the LDRs, were not included because these costs would be dependent upon the analytical results and identified degree of contamination of the material to be disposed and the governing LDRs of the time of disposal. Analytical results available to date do not indicate the presence of hazardous materials within the trench. However, the cost estimate is conservative as it assumes that the material to be disposed of is 50 percent hazardous and 50 percent non-hazardous. It is assumed that the range of the cost estimate provided in this EE/CA (+50/-30) would cover any required pretreatment costs.

**Comment #2:** Page 5-14, Section 5.2.1, Item C.1: Since active landfill disposal of contaminated material is on-going at the CWM Chemical Services facility, why is landfill disposal of the contaminated material from Area A not expected to be readily accepted by the public?

**Response:** In general, landfill disposal is typically not as readily accepted as treatment alternatives involving little or no disposal.

**Comment #3:** Page 5-14, Section 5.2.2: Change the second remedial alternative from removal-fixation-disposal to removal-treatment-disposal.

**Response:** The text will be revised accordingly.

**Comment #4:** Page 5-38, Section 5.2.3.3: Attached are copies of a September 1981 drawing of the location and status (as of the drawings date) of underground lines at the CWM Chemical Services facility. CWM should be contacted to determine the current status of underground lines (whether they have been removed).

In addition, it appears from Figure 2-18, that a portion of the TNT lines run under the North Salts area or the northern berm of this inactive surface impoundment. If this is correct, extra precautions will need to be taken to ensure the stability of the berm.

**Response:** Acres did not receive a copy of the referenced drawing, however, Acres concurs that further discussions with CWM would be required prior to initiating the remedial action. It is also our understanding that the sewer lines that run under the North Salts area may have been removed at the time of construction of the North Salts Pond. This would also have to be verified with CWM and addressed in the design accordingly.

**Comment #5:** Page 5-50, Section 5.3: Please be advised that, depending on the results of post-removal verification sampling and sampling of groundwater accumulation in excavations, a groundwater remedial system may be required as part of the long-term remedy for the Areas A & B, the TNT lines and the chemical waste sewer system.

**Response:** Acres concurs. As stated on page 3-1, the proposed removal action is considered to be an interim action and additional actions may be required in a final remedial action effort.

**Comment #6:** Page 5-51, Section 5.3, Alternative 1: Aqueous treatment at CWM will be feasible depending on the capacity of the facility to handle the volume of water generated. Alternatives 2 and 3 also appear to be feasible.

**Response:** Acres agrees with this comment.

**Comment #7:** Page 7-1, Section 7: All of the preferred removal actions will require confirmation sampling to assure that clean-up criteria have been achieved.

**Response:** Confirmation sampling is considered part of most removal actions (see Figures 5-1 through 5-14) and will be added to each alternative for the chemical waste sewers. Costs for confirmation sampling were included in the estimates for all areas.