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**Bennett & Williams
Environmental
Consultants Inc.**

Memo

To: Mark Bohne & Members of the Plum Brook Ordnance Works
RAB

From: Julie Weatherington-Rice, TAPP Support to the PBOW RAB

CC:

Date: February 7, 2006

Re: Review of the Draft Interim Soil Removal Action (ISRA)
Report for the PBOW Pentolite Road Red Water Ponds,
November 2005

We have reviewed the Draft Interim Soil Removal Action (ISRA) Report for the PBOW Pentolite Road Red Water Ponds, November 2005. For the most part, we concur with the decisions and recommendations made in this document.

This Draft document, prepared by WTI, Poca, West Virginia, discusses the earlier investigations of contamination in soils under the historical Pentolite Road Red Water Pond and their removal. The report also discusses the historic abandonment of ground-water monitoring wells at the Plum Brook facility.

The soils excavation and removal activity was planned to remove soils from an area 20' x 20' x 10' in depth. However, the actual excavation was stopped at 8 feet because of high ground water. It was determined that contamination existed beyond the original identified investigation area so additional exploration pits were dug around the Red Water Pond in the summer of 2004. Besides field screening, the area of the original pond was identified by a distinctive "dark seam" approximately 4 feet below the ground surface. Since this was a "Risk Based" site investigation, the expansion of the area to be remediated was driven by the need to expand the remediation site to beyond the unacceptable Hazard Index. The Contaminant of

Concern (COC) is TNT. Recommendation for "Further Action" is to over-excavate the site until the floor and sidewalls have a Hazard Index of 1.0 or less. Soil from the test pits was composted at the TNT B composting site, although the materials were kept separated for ease of independent testing. It has been determined that the final over-excavated materials will also be suitable for windrow composting, after which, the soils can be disposed of at the Erie County Landfill.

The test pits were filled with soil from the Barnes Nursery, the same "borrow" area used for the TNT B test pits. Final estimation is that a total of 7,600 cubic yards of soils will have to be removed before the site is finally considered clean. This is significantly larger than the original 148 cubic yard estimation. A graphic showing this original excavation and future excavation area is included in the report.

Our concerns expressed in the TNT B review about the need to insure samples are taken in oxidized materials across fractures instead of in reduced matrix settings only, apply to this location as well. Since most of the site is in natural "in-site" soils, such diligence is even more important in this setting. This earlier voiced concern is emphasized in this review.

The report is well documented with color pictures and tables. We did not find a site map of the Pentolite Road Red Water Ponds in the printed portion of the report, so from this report, we were unable to locate the site at Plum Brook. We know the location from other information. Additional materials were included in a CD attached to the report, but the CD did not include a site map of Plum Brook Ordnance Works with the Pentolite Road Red Water Ponds included either. Such a map would have made this a better "stand alone" document.

This concludes our comments. This is a much smaller and directly linked document to the TNT B document just reviewed. If you have additional questions and/or need further information, please feel free to contact us.