



City of North Tonawanda
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April 9, 2015

Gregory P. Sutton, P.E.
Regional Hazardous Waste Remediation Engineer
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, NY 14203-2999

Re Groundwater Withdrawal System
Gratwick Riverside Park Site, North Tonawanda
Corrective Measures Plan

Dear Mr. Sutton,

Prior to the Mayor of the City of North Tonawanda receiving your March 12, 2015 letter of concern regarding the operation of the groundwater withdrawal system at the Gratwick Riverside Park Site, pumps had been ordered by the city and were in the process of being installed.

The city's Department of Public Works ordered two (2) 7.5 HP pumps on January 15th for Pump Station No. 1 (MH- 3), that were delivered on February 19th, one of which was installed on February 20th with the other pump held as a spare. After some difficulty getting the pump to seat properly, flow was immediately observed at the meter building, as well as visually at the downstream discharge point.

New 3 HP pumps were ordered on February 5th for the other two pump stations and delivered to the city on March 11th. The DPW completed the new overload wiring and pump installation at P.S. No. 2 (MH 9) on March 17th. The pump became operational later that afternoon.

On Thursday, March 19th, the new pump was installed at P.S. No. 3 (MH 15). The crew had problems getting the pump to seat properly at this installation. If you recall, this pump station's wet well was pumped down last September and the sediment was sucked out by Kandey Company with their vac truck. At that time, we were suspecting that the downstream portion of the last 600 feet of the 6 inch forcemain, from the pump station to the discharge point at the marina, may have been restricted with the resin like deposits that have been encountered. As it turns out, this might not be the case. We suspect now that the pump is recirculating back into the wet well because of some mechanical problem with the connection.

In the next two weeks, we intend to pump down the wet well at P.S. No. 3, which is easily accomplished with a hose connection to the piping in the meter building 200 feet away. Once this is done, we will have a contractor enter into the confined space to correct the problem at the pump connection to the forcemain and also inspect the check valve.

At this point, the city feels that the work performed thus far in correcting the pump problems falls within the category of normal operation and maintenance of the GRP facilities as spelled out in

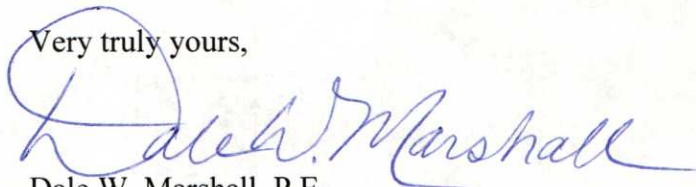
the Agreement for Joint Performance of Remedial Design/Remedial Action entered amongst the Performing Parties. The city currently finds no reason to meet with the PPs to discuss the possibility of performing an expensive rehabilitation of the collection and discharge system since the pumps are discharging properly with adequate flowrates being obtained and recorded.

Although the pumping capability of the collection system was down over the late winter months this year, at no point was the environment not adequately protected. The 36 inch thick clay bentonite barrier slurry wall, which is keyed into the confining soil layer below, provides the ultimate protection. The average temperature for the month of February was 10.2 degrees Fahrenheit, with a frost penetrating the ground to a depth over 42 inches. Absolutely no melting occurred to cause groundwater elevations to rise. Water elevations observed within the wet wells during this time were several feet below the top of the slurry wall elevation of 568.50 feet amsl.

This letter to you will serve as the city's corrective measures work plan you requested, within the 30 day period as ordered.

If you have any questions, please do not hesitate to contact me at (716) 695-8565.

Very truly yours,



Dale W. Marshall, P.E.
City Engineer

DWM:dwm

cc: Arthur G. Pappas, Mayor (electronic copy)
Brad Rowles, Superintendent of Public Works (electronic copy)
Amanda Reimer, Assistant City Accountant (electronic copy)
Brian Sadowski, NYSDEC Region 9 (electronic copy)
Mathew Forcucci, NYSDOH (electronic copy)
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