



**CONESTOGA-ROVERS
& ASSOCIATES**

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June 30, 2015

Reference No. 012725-12

Ms. Terri Bulman
Ministry of the Environment and Climate Change
Ellen Fairclough Building
119 King Street West, 12th Floor
Hamilton Ontario
L8P 4Y7

Dear Ms. Bulman:

Re: Work Plan Amendment
East Side Surficial Soil and Groundwater Investigation Work Plan
Chemtura Canada Co./Cie (Chemtura)
Elmira, Ontario

Conestoga Rovers & Associates (CRA), the Ontario Ministry of Environment and Climate Change (MOECC) and More Than Engineering (MTE) met on June 15, 2015 to discuss the draft "East Side Surficial Soil and Groundwater Investigation Work Plan" (CRA, January 2015) (Work Plan) and associated investigations to be conducted by MOECC on the adjacent property east of the Chemtura facility (Site) in Elmira Ontario.

Based on this discussion, CRA proposes the following amendments to the Work:

1. After Chemtura has collected the surface soil samples, Chemtura will install three strategically located test pits along the eastern property boundary. The test pits will be located as close to the fence line as possible in areas where fill has been placed, as shown on Figure 1. The rationale for adding test pits is that the ground surface during the operation of the former east side pits may have changed with the addition of fill material. If a former soil horizon can be identified in the test pit wall (based on colour/texture/odour/evidence of vegetation), it will be sampled for the same parameters as the surficial soil samples. A second sample in each pit will be collected below the soil horizon to provide vertical delineation of any contaminants. If there is no former soil horizon identified then additional soil samples will not be collected.
2. The two surficial soil samples locations between GP1/2 and the fence line proposed in the Work Plan will not be included in the sampling program. The rationale for not collecting these samples is to focus resources on the fence line to evaluate the potential for off-Site migration to the east or south in this area of the Site.
3. Chemtura will complete the groundwater sampling as outlined in the Work Plan with no proposed changes.



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- 2 -

Work will begin after MOECC has approved this Work Plan Amendment. Chemtura will coordinate the fieldwork such that MOECC field staff will have the opportunity to observe the work and to collect split samples. If timely approval is obtained the work will be completed before September 2015.

MOECC will approach the owner of the property located east of the Site. If the owner is agreeable, the MOECC will conduct a reconnaissance of the property with the aim of selecting appropriate sample locations. Initial off-Site sampling will focus on the eastern Site boundary and any drainage features. MOECC will also review the results of the on-Site investigation for the design of the off-Site soil sampling plan. MOECC anticipates off-Site soil sampling will occur later in the summer/fall of 2015. MOECC will also ask the property owner for permission to sample his potable water well.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Alan Deal

AD/cb/1

Encl.

cc: Rich Vickers, MOECC
Jamie Connelly, MOECC (email)
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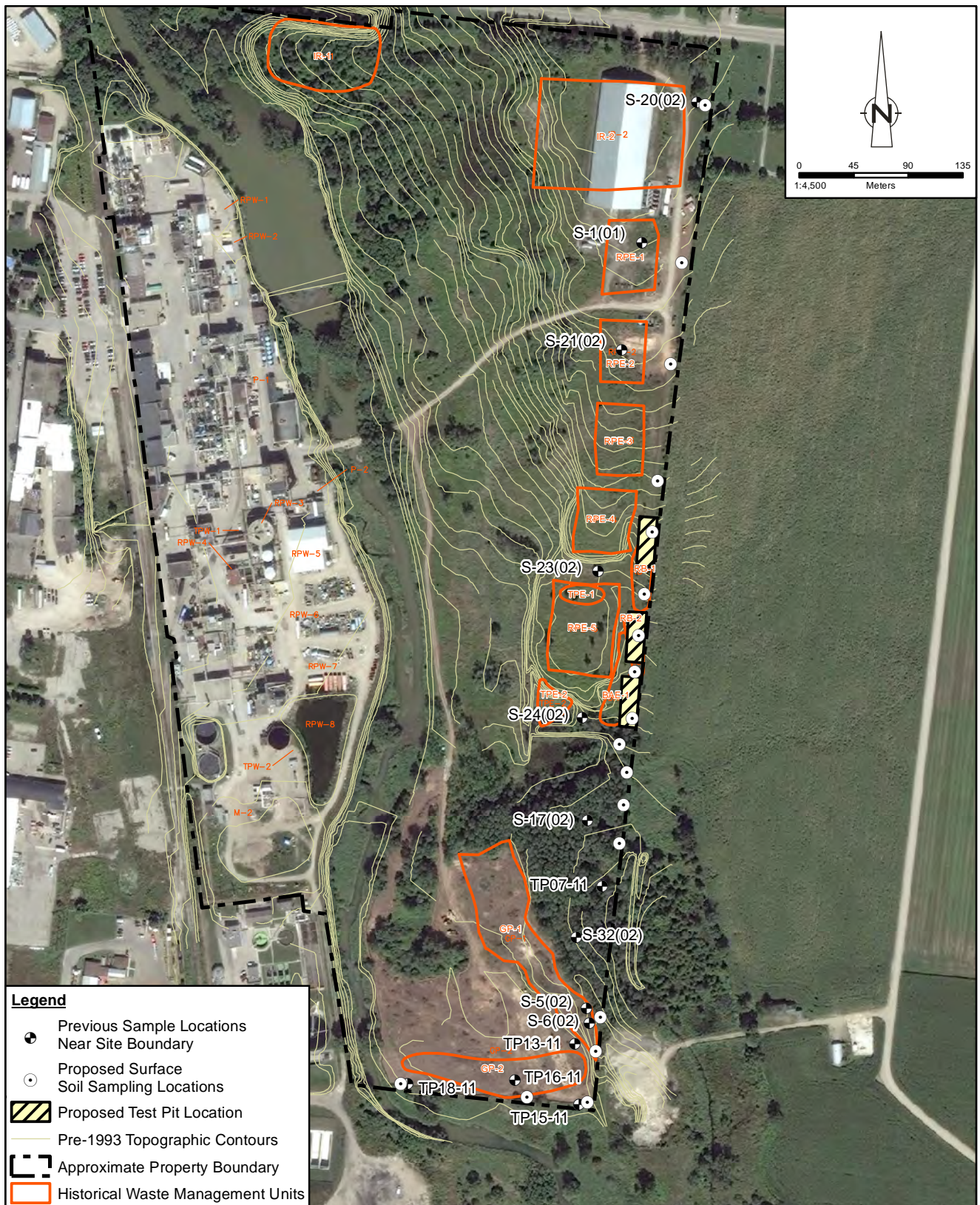


figure 1

PROPOSED EAST SIDE SURFACE SOIL SAMPLING AND TEST PIT LOCATIONS
 EAST SIDE SURFACE SOIL AND GROUNDWATER INVESTIGATION
 CHEMTURA CANADA CO./CIE
 Elmira, Ontario