

**United States Environmental Protection Agency
Region II
POLLUTION REPORT**

Date: Friday, July 26, 2002

From: Jack Harmon

To:	Jack D. Harmon, US EPA Removal Action Branch Alan Cohen, City of Ithaca	Ildefonso Acosta, US EPA Special Projects Branch Tom Suozzo, NYS Department of Environmental Conservation
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Subject: Initial
Ithaca Gun Company Site
121-125 Lake Street, Ithaca, NY
Latitude: 42.4517650
Longitude: -76.4930560

POLREP No.:	1	Site #:	QJ
Reporting Period:		D.O. #:	0059
Start Date:	1/30/2002	Response Authority:	CERCLA
Mob Date:	4/8/2002	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	NYN000204292	Contract #	68-S2-99-08
RCRIS ID #:			

Site Description

The Ithaca Gun Company Site (the "Site") comprises property formerly occupied by the Ithaca Gun Company at 121-125 Lake Street, Ithaca, New York, as well as adjacent properties where hazardous substances from the Site have come to be located. The City of Ithaca owns most of the adjacent property that is contaminated with hazardous substances and this property is popular with hikers, swimmers, fishermen and others due to the scenic nature of the Ithaca Falls/Fall Creek gorge area. Lead shot was dumped from the Ithaca Gun Company property into a millrace and lead shot as well as lead contaminated soils have migrated onto downgradient properties via erosion from a portion of the Ithaca Gun Company property. While the Ithaca Gun Company property is fenced, there are indications that trespassers frequently visit the Site. The City's property is not fenced and there is clear evidence that this property is actively used. Significant quantities of lead shot are clearly evident on the ground surface on both the Ithaca Gun Company property and the adjacent properties. Analytical results from sampling conducted by New York State on the City's property yielded lead concentrations ranging from 251 parts per million (ppm) to 215,000 ppm.

On August 29, 2000, the U.S. Environmental Protection Agency (EPA) received a request from the New York State Department of Environmental Conservation (NYSDEC) to conduct an emergency removal action at the Ithaca Gun Company Site under Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, by the Superfund Amendments and Reauthorization Act of 1986 (see Attachment B). This request was prompted by historical soil sampling that was conducted by the NYSDEC and by Cornell University that revealed elevated lead concentrations. Based upon the sampling results, the New York State Department of Health (NYSDOH) considers the Site a potentially significant health threat, particularly for children.

Current Activities

On January 30, 2002, an initial site visit with the ERRS contractor was held. Brainstorming sessions were held subsequent to the site's visit to develop an operational plan for access and removing the lead contaminated soils. Drafting of a Work Plan and a Health and Safety Plan was initiated.

On February 27 and February 28, 2002, ERRS contractor personnel conducted a detailed inspection of the bridge structure, spanning the millrace, to determine member sizes and section losses. With the data

obtained during the inspection, a Level One rating was performed on the structural steel components in accordance with all current NYSDOT guidelines and procedures. The summary of the Level One rating recommended covering holes thru the decking with 1" thick steel plate. After which, the bridge is capable of carrying legal loads (80,000 lbs.) at a reduced speed of 5 mph.

During the week of March 25, 2002, a pre-demolition survey was conducted on three structures, i.e., quonset hut, barn, and metal building. The survey was conducted to determine the presence of asbestos materials. Low concentrations of non-friable asbestos fibers were identified in window glazing and in modified roofing material.

On April 3, 2002, access to the IGC property was granted and mobilization occurred on April 8. During the week of April 8, electrical service was provided and small trees and brush were cleared from along the driveway. The gate house was secured and preparations made for demolition of three structures. A copy of the pre-demolition surveys was submitted with an application for demolition to the Building Department at the City of Ithaca.

Discussions were held with the Natural Areas Commission (NAC) members and the Forester for the City of Ithaca to develop a procedure for designating/marketing trees and bushes. Trees and bushes were marked by NAC members and the Forester in three different categories, those for removal, those to remain, and those that will be removed and tended at the Cornell Plantations until a suitable time for replanting.

On April 17, a demolition permit was issued by the City of Ithaca for demolition of three on-site structures, i.e., quonset hut, barn and a one story metal building located on the "island". Demolition of the quonset hut was initiated on April 17th and completed on April 19th with the off-site recycling/disposal. During demolition activities, the structure was continuously wetted to suppress generation of dust. Of note, a test firing tube was discovered within the east wall of the quonset hut during the demolition and was left intact. A total of three loads of metal was sent for recycling and two loads of debris were sent for disposal. In addition to the demolition of the quonset hut, a concrete retaining wall was removed and sent off-site for disposal. The removal of the concrete retaining wall increased the width of the access road onto the bridge that will allow for the passage of large trucks. Structural rehabbing of the bridge was also initiated with the placement of one-inch thick steel plates over two holes in the decking.

During the week of April 22, structural rehabbing of the bridge was completed and demolition of the two structures on the "island" was completed. During the demolition of both buildings, the structures were continuously wetted to prevent the generation of dust. A total of 14 loads of demolition debris was sent for disposal and eight loads of steel were recycled at a local metal salvager. The DPW was contacted and barriers placed at the entrance the Fall Creek Falls to prevent visitors from entering and being injured by possible falling objects. NAC members began tagging plants for removal and storage pending replanting. Thru June 19th, 2,201 trees/plants had been removed and transferred to the Cornell Plantations.

An XRF was delivered during the week of May 20 and further delineation of the east bank area was initiated. The east bank area was divided into 25 foot wide sections and five samples are being collected from each 500 square foot area. Samples are being collected from the surface (0-2"), one-foot, and two-foot intervals.

In compliance with the National Historic Preservation Act, a Phase I survey was commissioned with the Public Archeology Facility thru SUNY Binghamton. Test pits were dug at established grid nodes as well as biased locations in the millrace. The east bank area was investigated and based upon historical information, this area does not possess the likelihood of having historically significant artifacts and a clearance letter was issued to the State Historical Preservation Office.

On June 3, 2002, a draft work plan, a draft HASP, and a draft sampling and analysis plan were issued to the public for comments. On June 11, 2002, a technical representative from a major vacuum service company visited the site. Contrary to information received prior, vacuuming of the contaminated soil is feasible in most, if not all, of the work areas. The limiting factor will be steepness of the terrain and the safety of the technicians at the end of the suction hose. On June 20, 2002, public availability sessions were held in City Hall to answer questions concerning the proposed removal of lead contaminated soil.

Bids for vacuum services were solicited and after review and references checked, a subcontract was awarded to Clean Harbors. During the week of July 8, 2002, collection of background air monitoring/sampling data was initiated. Also during this time period, a temporary fence was erected on property east of the Site and the existing fence along the east driveway was removed in preparation for clearing the east area of debris. Verbal authorization on the clearance letter for the east area was received

and initiation of the lead soil removal was scheduled for the week of July 22nd.

On Tuesday, July 23, 2002, Clean Harbors mobilized and began vacuuming lead contaminated soils from work section E-12. A press release announcing the startup of the lead removal was issued on Wednesday, July 24th which generated significant response from both local and regional television and print media. The first vacuum box of lead contaminated soil was sent for off-site disposal on Thursday. The Mayor's office, as requested, was notified prior to the off-site shipment.

Planned Removal Actions

The Administrative Record, once completed, will be placed in the Tompkins County Library. The Site's website, www.epaosc.net/ithacagun will be updated frequently with site progress reports, photographs, POLREPs, post excavation soil sampling results, air monitoring results, etc...

Next Steps

Once the east area has been completed, soil removal activities will move to the westerly parcel.

Key Issues

Due to the Site's industrial history, a Phase I Cultural Resources Survey is being conducted under Section 106 of the National Historical Preservation Act (NHPA).

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,500,000.00	\$500,666.00	\$999,334.00	66.62%
RST/START	\$100,000.00	\$5,600.00	\$94,400.00	94.40%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$66,000.00	\$17,670.00	\$48,330.00	73.23%
USEPA - InDirect	\$134,000.00	\$36,416.00	\$97,584.00	72.82%
Total Site Costs	\$1,800,000.00	\$560,352.00	\$1,239,648.00	68.87%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

response.epa.gov/ithacagun

POLREP #1 Last Updated 8/1/2002