

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

Date: Monday, September 9, 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
Eric Simpson, US EPA Radiation and Indoor Air Daniel Geraghty, New York State Department of Health	George Shanahan, US EPA Office of Regional Council Michael Basile, US EPA Communications Division

Subject: Ithaca Gun Company Site
121-125 Lake Street, Ithaca, NY
Latitude: 42.4517650
Longitude: -76.4930560

POLREP No.: 3	Site #: QJ
Reporting Period: 8/12/2002 - 9/06/2002	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

During the reporting period, vacuuming of lead soil from the east area continued. During the week of August 12, 2002, lead soil was removed from sections E-10 and E-9. Post removal soil samples collected from section E-10 averaged 87.8 ppm and 54.9 ppm from section E-9. Six vacuum boxes of lead soil were shipped for off-site disposal at the Ontario County Landfill in Stanley, NY last week, bringing the total to sixteen. The average weight per vacuum box increased, in last weeks shipments, to 13.7 tons. A total of five loads (80 cubic yards) of topsoil was delivered on Wednesday/Thursday. Section E-10 was topsoiled, seeded w/fertilizer and covered with erosion control matting. This brings the total of

three work sections completed. Tree removal continued in work sections, E-08 thru E-05.

During the week of August 19, 2002, lead soil removal was completed from sections E-9 and E-8. Post removal soil samples collected from section E-9 averaged 54.9 ppm and 88 ppm from section E-8. Ten vacuum boxes of lead soil were shipped to the Ontario County Landfill in Stanley, NY last week, bringing the total to twenty-six. The average weight of last weeks shipments were 13.2 tons. A twice daily schedule has been established for switch-out of the vacuum boxes, i.e., 07:00-08:00 and 12:00-13:00 hours. Two loads of topsoil were delivered on Tuesday and five loads on Friday. In addition to the ten vacuum boxes, two roll-off boxes of tree stumps were shipped to the Hyland Facility Associates Landfill in Angelica, NY. Sections E-9 and E-8 were topsoiled, seeded w/fertilizer and covered with erosion control matting. This brings the total of five work sections completed (average post removal lead soil concentration of 90.7 ppm). Tree removal, in work sections E-08 thru E-05, was completed.

During the week of August 26, 2002, lead soil removal was completed from section E-7 and began on section E-6. The post removal soil samples collected from section E-7 averaged 70.3 ppm. This brings an average concentration for post removal soil samples, from six work sections, to 82.8 ppm. Nine vacuum boxes of lead soil were shipped for off-site disposal at the Ontario County Landfill in Stanley, NY last week, bringing the total to thirty-five. In addition to the nine vacuum boxes, one roll-off container of tree stumps was shipped to the Hyland Facility Associates Landfill in Angelica, NY. The average weight of last weeks shipments were 14.5 tons. In observance of the Labor Day Holiday, site activities ceased on Friday, August 30 and resumed on Tuesday, September 3.

During the week of September 2, 2002, vacuuming of lead contaminated soil, from the east area, resumed, after observing the Labor Day Holiday. Lead soil removal was completed from section E-6 and began on section E-5. The post removal soil samples collected from section E-6 averaged 76 parts per million(ppm). Five vacuum boxes of lead soil were shipped for off-site disposal at the Ontario County Landfill in Stanley, NY last week, bringing the total to forty. The existing "Cusco" vacuum truck was replaced with a "Guzzler" type vacuum. The Guzzler is better suited for vacuuming solids and a better result was seen in the heavier weights of the vacuum boxes. The average weight of last weeks shipments were 15.4 tons which is approximately two tons more, on average, than previous shipments. Vacuum boxes continue to be switched-out twice daily, i.e., 07:00-08:00 and 12:00-13:00 hours. Three loads of topsoil were delivered on Thursday. Section E-7 was topsoiled, seeded w/fertilizer and covered with erosion control matting. This brings the total of six work sections completed (average post removal lead soil concentration of 82.8 ppm). Tree removal, in work sections E-3 thru E-5, was completed.

The Administrative Record was completed and was placed in the Tompkins County Library. The Site's website, www.epaosc.net/ithacagun is being updated frequently with site progress reports, photographs, POLREPs, and air monitoring results.

The RST contractor continues to provide air monitoring/sampling. The air monitoring/sampling continues with no increases in particulates being observed from the soil removal operation. Except for one "hit" for arsenic that can be attributed to cigarette smoke, all personal air pump samples for resulted in "non-detects" for lead and arsenic. All particulate data, thru August 9, and a summary table with lead and arsenic results from personal air pumps were posted on the website. In addition to these postings, the health & safety plan and initial POLREP were posted previously

Planned Removal Actions

Once approval of the Phase I Survey has been received, lead soil removal operations will move into the Upper Millrace area and proceed downstream until the onset of winter weater.

Although clearance was received for the westerly area, lead soil removal in this area will be delayed until late Spring or early Summer. With Cornell University being back in session the logistics of coordinating work in a limited area and associated parking lot traffic are too difficult. Also, the amount of time available when Cornell is on recess is too short to accomplish the intended tasks.

Next Steps

Once the east area has been completed, soil removal activities will move to the upper millrace area.

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
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Extramural Costs				
ERRS - Cleanup Contractor	\$1,500,000.00	\$800,800.00	\$699,200.00	46.61%
RST/START	\$100,000.00	\$26,089.00	\$73,911.00	73.91%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$66,000.00	\$25,822.00	\$40,178.00	60.88%
USEPA - InDirect	\$134,000.00	\$53,210.00	\$80,790.00	60.29%
Total Site Costs	\$1,800,000.00	\$905,921.00	\$894,079.00	49.67%

* 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 #3 Last Updated 9/10/2002