

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

Date: Monday, October 7, 2002

From: Jack Harmon

To: Jack D. Harmon, US EPA Removal Action Branch	Ildefonso Acosta, US EPA Special Projects Branch
Alan Cohen, City of Ithaca	Tom Suozzo, NYS Department of Environmental Conservation
Eric Simpson, US EPA Radiation and Indoor Air	George Shanahan, US EPA Office of Regional Council
Daniel Geraghty, New York State Department of Health	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.:	4	Site #:	QJ
Reporting Period:	9/09/02 - 10/04/02	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 week of September 9, 2002, vacuuming of lead contaminated soil from the east area continued. Lead soil removal was completed from section E-5 and begun on section E-4. Laboratory results of post removal soil samples collected from section E-6 averaged 39 parts per million (ppm). For the seven completed work sections, the average lead concentration detected in the post removal sample results is 76.5 ppm. Ten vacuum boxes of lead soil were shipped for off-site disposal at the Ontario County Landfill in Stanley, NY last week, bringing the total number of loads to fifty or 696.3 tons. In addition to the ten vacuum boxes, one roll-off container of tree stumps and debris was shipped to the

Hyland Facility Associates Landfill in Angelica, NY. Vacuum boxes continue to be switched-out twice daily, i.e., 07:00-08:00 and 12:00-13:00 hours. Six loads of topsoil were delivered during the week and section E-6 was topsoiled, seeded w/fertilizer and covered with erosion control matting. This brings the total of seven work sections completed.

The vacuum truck and associated vacuum box were moved to a loading dock at the southeastern corner of the former manufacturing building. Since the vacuum truck is now next to Lake Street and its residents, a geofabric has been attached to the front gate to muffle the added noise.

During the week September 16, 2002, lead soil removal was completed from section E-4 and begun on sections E-3 and E-2. The post removal soil samples collected from section E-4 averaged 146 parts per million(ppm). To date, the average lead concentration for all post removal sample results is 84.2 ppm. The steep terrain in sections of the east area that remain is expected to cut productivity in half. 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 fifty-five. The average weight of last weeks shipments were 16.6 tons. Switch-out of vacuum boxes has been reduced down to once daily at around 11:00 hours. Seven loads (112 cubic yards) of topsoil were delivered during the week and section E-5 was topsoiled, seeded w/fertilizer and covered with erosion control matting. A total of eight work sections have been completed. An order was placed for plants/shrubs to be planted on the east area.

During the week of September 23, 2002, lead soil removal was completed from sections E-3 and E-2 and began on section E-1. The post removal soil samples collected from section E-3 averaged 128 parts per million(ppm) and section E-2 averaged 55.3 ppm. To date, the average lead concentration for all post removal sample results is 84.2 ppm. The rate of productivity has dropped-off due to the steep terrain in sections where work is currently being performed. Three 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 fifty-eight(832 tons). The average weight of last weeks shipments was 17.2 tons. Switch-out of vacuum boxes has been reduced down to less than once per day. Nine loads (144 cubic yards) of topsoil were delivered during the week and sections E-4, E-3 and E-2 were topsoiled, seeded w/fertilizer and covered with erosion control matting. This brings the total of eleven work sections completed. Due to heavy rainfall on Friday, no site work was conducted.

An Action Memorandum requesting a ceiling increase and exemptions from the 12 month and \$2M statutes was approved. The new project ceiling is \$4.05M, of which, \$3.0M is for mitigation contracting. Extrapolating from the observed rate of productivity for vacuuming has led to a revised estimate for a time to completion. The removal action will continue until the Christmas Holiday and then demobilize until Spring. The removal action is expected to be completed by the end of 2003.

Lead soil removal continued in sections E-1, E-0 and E-00 during the week of September 30, 2002. The steep terrain in these sections continues to affect productivity. Two 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 sixty(855 tons). The average weight of last weeks shipments was 11.5 tons. Switch-out of vacuum boxes continues to be less than one per day. Three loads (48 cubic yards) of topsoil were delivered during the week and applied to section E-2.

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.

During the week of September 23, 2002, responsibility for implementing the Site's air monitoring/sampling plan was taken over by the U.S. Coast Guard's Atlantic Strike Team (AST) from the RST contractor. The air monitoring/sampling continues with no significant 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 October 4, 2002, have been posted on the website.

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 weather.

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
Extramural Costs				
ERRS - Cleanup Contractor	\$3,300,000.00	\$1,053,136.00	\$2,246,864.00	68.09%
RST/START	\$140,000.00	\$45,012.00	\$94,988.00	67.85%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$86,600.00	\$25,822.00	\$60,778.00	70.18%
USEPA - InDirect	\$178,400.00	\$53,210.00	\$125,190.00	70.17%
Total Site Costs	\$3,705,000.00	\$1,177,180.00	\$2,527,820.00	68.23%

* 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 #4 Last Updated 10/8/2002