

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

Date: Monday, November 18, 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
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Subject: Ithaca Gun Company Site
121-125 Lake Street, Ithaca, NY
Latitude: 42.4517650
Longitude: -76.4930560

POLREP No.:	5	Site #:	QJ
Reporting Period:	10/07/02 - 11/15/02	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 October 7, 2002, vacuuming of lead contaminated soil from the east area continued. Lead soil removal continued in sections E-0 and E-00. The steep terrain in these sections continues to affect productivity. 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 sixty-three (906.55 tons). The average weight of last weeks shipments was 17.2 tons. Switch-out of vacuum boxes continues to be less than one per day. In an effort to control surface water run-off and subsequent erosion, drainage tile and a berm were installed along the top of the east area.

During the week of October 14, 2002, vacuuming of lead contaminated soil from the east area continued. Lead soil removal was completed in sections E-0 and E-00. Lead removal operations are now in E-003, the last or southernmost work section. The steep terrain continues to affect productivity. The post removal soil samples collected from section E-0 averaged 175 parts per million(ppm). To date, the average lead concentration for all post removal sample results is 111 ppm. 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-five (929 tons). The average weight of last weeks shipments was 13.9 tons. Switch-out of vacuum boxes continues to be less than one per day.

During the week of October 21, 2002, vacuuming of lead contaminated soil from the east area continued. Lead soil removal continued in section E-000, the last or southernmost work section. The steep terrain continues to affect productivity. 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 sixty-eight (974 tons). The average weight of last weeks shipments was 14.9 tons. Switch-out of vacuum boxes continues to be less than one per day. To date, the average lead concentration for all post removal sample results is 111 ppm.

During the week of October 28, 2002, vacuuming of lead contaminated soil from the east area continued. Lead soil removal continued in section E-000, the last or southernmost work section. In addition, lead soil was removed from portions of the residential property immediately to the south of section E-000. Three loads (48 cubic yards) of topsoil were then applied and covered with erosion control matting. The steep terrain 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 seventy (1,014 tons). The average weight of last weeks shipments was 17.5 tons. Switch-out of vacuum boxes continues to be less than one per day. To date, the average lead concentration for all post removal sample results is 111 ppm.

During the week of November 4, 2002, vacuuming of lead contaminated soil from the east area was completed. 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 seventy-two (1,045.04 tons). The average weight of last weeks shipments was 15.6 tons. The post removal soil samples collected from section E-00 averaged 143 parts per million(ppm) and section E-000 averaged 129 ppm. To date, the average lead concentration for all post removal sample results is 110 ppm. Lead soil removal operations are now concentrating on work section E-13 and will progress thru work section E-15 and the upper mill race areas.

During the week of November 11, 2002, removal of lead contaminated soil from the northern sections of the east area continued. Work concentrated on sections adjacent to the office trailer. Four 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 seventy-six (1,124.29 tons). The average weight of last weeks shipments was 19.8 tons. To date, the average lead concentration for all post removal sample results is 110 ppm. Backfilling operations continued in areas E-00 and E-000 with thirty-two cubic yards of clean topsoil being placed. Clearing and grubbing of dead and invasive species of trees was initiated in work sections E-13 thru E-16. A mini-excavator and small dozer were mobilized in preparation for removing tree stumps from work sections E-13 thru E-15.

A final copy of the Phase I Archeological Survey was received and will be added to the Administrative Record located at the Tompkins County Library.

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 U.S. Coast Guard's Atlantic Strike Team (AST) continues responsibility for implementing the Site's air monitoring/sampling plan. 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 November 14, 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 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
Extramural Costs				
ERRS - Cleanup Contractor	\$3,300,000.00	\$1,269,560.00	\$2,030,440.00	61.53%
IAGs	\$0.00	\$19,929.00	(\$19,929.00)	0.00%
RST/START	\$140,000.00	\$45,012.00	\$94,988.00	67.85%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$86,600.00	\$40,161.00	\$46,439.00	53.62%
USEPA - InDirect	\$178,400.00	\$82,756.00	\$95,644.00	53.61%
Total Site Costs	\$3,705,000.00	\$1,457,418.00	\$2,247,582.00	60.66%

* 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 #5 Last Updated 11/19/2002