

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

Date: Monday, December 23, 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.:	6	Site #:	QJ
Reporting Period:	11/18/02-12/20/02	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 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.

During the week of November 18, 2001 and leading-up to the Thanksgiving Holiday observance, removal of lead contaminated soil from the northern sections of the east area continued. Rainy weather during the week affected productivity of removal as well as backfilling operations. Work concentrated on the elevated areas in section E-13, adjacent to the office trailer. 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-eight (1,153.75 tons). The average weight of last weeks shipments was 14.7 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, grass seed broadcasted, and chaff placed. Clearing and grubbing of dead and invasive species of trees continued in work sections E-13 thru E-16 and one roll-off of tree stumps generated.

During the week of December 2, 2002, personnel remobilized and site operations resumed. The onset of unseasonably cold temperatures severely hampered efforts to vacuum the lead contaminated soil. The normally flexible plastic hose becomes very brittle in cold temperatures and a significant amount of time was spent initially to repair/replace it. To resolve this problem, the flexible hose was either replaced with hard PVC piping or reinforced at chronic breaking points. Removal of lead contaminated soil from the northern sections of the east area continued. Cold temperatures during the week affected productivity of removal as well as backfilling operations. Work continued on the elevated areas in section E-13, adjacent to the office trailer. Two vacuum boxes of lead soil were shipped for offsite disposal at the Ontario County Landfill in Stanley, NY last week, bringing the total to eighty. To date, the average lead concentration for all post removal sample results is 110 ppm. Backfilling operations were completed in areas E-00 and E-000. The EPA and its contractors intend to complete the removal of lead contaminated soil from the present work sections prior to demobilizing for the winter months on December 20th.

During the weeks of December 9 and December 16, 2002, work continued on the elevated areas in sections E-13 thru E-15, adjacent to the office trailer. Three vacuum boxes of lead soil were shipped for offsite disposal at the Ontario County Landfill in Stanley, NY, bringing the total to eighty-three (1,221 tons). To date, the average lead concentration for all post removal sample results is 110 ppm. Site operations will be shut down over the Christmas and New Year Holidays and resume the week of January 6th, weather permitting. Completion of the current work sections is sought prior to shutting down for the winter months.

The NYS Office of Parks, Recreation and Historic Preservation has completed their review of the Phase I Archeology Report ("report") in accordance with Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations. Based upon their review, it is the State Historical Preservation Office's ("SHPO") opinion that the removal action will have "No Effect upon cultural resources in or eligible for inclusion in the National Register of Historic Places." The SHPO concurs with the report's recommendations that encourage preservation of millrace features and historic foundation remains where possible and providing notification of any major discoveries and/or archeological monitoring. The EPA will abide by the report's recommendations and will proceed with as much sensitivity toward the historic remains as possible.

The recent cold weather has also hampered the air monitoring effort. The data rams, that collect particulate data, do not operate effectively in temperatures below 32° F. Personal air pumps continue to operate effectively in below freezing temperatures and continue to collect air samples. Results from these air samples continue to be below laboratory method detection limits. The United States Coast Guard continues to implement the air sampling/monitoring plan.

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 December 13, 2002, have been posted on the website.

Planned Removal Actions

After mobilizing in April 2003, lead soil removal operations will move into the Upper Millrace area and proceed downstream. Although clearance was received for the westerly area, lead soil removal in this

area will be delayed until late Spring or early Summer.

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, the EPA will abide by the Phase I Archeology report's recommendations and will proceed with as much sensitivity toward the historic remains as possible.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$3,300,000.00	\$1,490,558.00	\$1,809,442.00	54.83%
IAGs	\$0.00	\$24,350.00	(\$24,350.00)	0.00%
RST/START	\$140,000.00	\$45,012.00	\$94,988.00	67.85%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$86,600.00	\$44,913.00	\$41,687.00	48.14%
USEPA - InDirect	\$178,400.00	\$92,548.00	\$85,852.00	48.12%
Total Site Costs	\$3,705,000.00	\$1,697,381.00	\$2,007,619.00	54.19%

* 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 #6 Last Updated 12/19/2002