

EXPLANATION OF SIGNIFICANT DIFFERENCES

URBANA LANDFILL SITE



Town of Urbana / Steuben County / Registry No. 8-51-007 / March 1999

Prepared by the New York State Department of Environmental Conservation
Division of Environmental Remediation

1.0 INTRODUCTION

The purpose of this notice is to describe the progress of the cleanup at the Urbana Landfill Site and to inform you about a change in the Site remedy. The Urbana Landfill is located on Crow's Nest Road in the Town of Urbana, Steuben County. In March 1998, the New York State Department of Environmental Conservation signed a Record of Decision (ROD) which selected a remedy to cleanup the Site. Shortly after the ROD was issued, Mercury Aircraft approached the Department and offered to construct a remedy somewhat differently from the one specified in the ROD. The differences from the original remedy are to build a more permeable and less expensive soil cover at the site and adding a groundwater capture system to collect and treat contaminated groundwater before it leaves the site.

This Explanation of Significant Differences (ESD) will become part of the Administrative Record for this Site. The information here is a summary of what can be found in greater detail in documents that have been placed in the following repositories:

Urbana Town Hall
41 Lake Street
Hammondsport
(607) 569-3737
Hours: M-F 9:00 am - 4:00 pm
Contact Shirley Para, Town Clerk

NYSDEC Reg. 8 Office
6274 East Avon-Lima Rd.
Avon, NY 14414
(716) 226-2466
Hours: Mon. - Fri. 8:30- 4:45
Contact Meaghan Boice-Green
for an appointment

Although this is not a request for comments, interested persons are invited to contact the Department's Project Manager for this site to obtain more information or have questions answered.

2.0 SITE DESCRIPTION AND ORIGINAL REMEDY

2.1 Site History, Contamination, and Selected Remedy

The site served as the town landfill, receiving wastes from 1968 to 1978. The site received municipal waste from both the Town of Urbana and the Village of Hammondsport during this time. Industrial waste from local manufacturers was also accepted at the site, including wastes from Mercury Aircraft, who, between 1971 and 1978, disposed of an unknown amount of chlorinated solvent still bottoms and paint sludges. The waste allegedly arrived in drums which were then punctured and allowed to drain on the ground. Fan-shaped pits were excavated in the upper portion of the landfill and received both septic sludge and solvent wastes.

In 1982, the site was listed on the State Registry of Inactive Hazardous Waste Disposal Sites as a Class 2a site. Class 2a sites require additional investigation before determining if the site poses a significant threat to public health or the environment. In 1984, the NYSDEC conducted a Phase II investigation. The NYSDEC and the NYS Department of Health (DOH) conducted additional sampling in 1988 and 1992. In 1994, the site was reclassified to a Class 2, indicating that it poses a significant threat to public health and/or the environment. In March 1995, the site was referred to the State Superfund for a state-funded Remedial Investigation/Feasibility Study (RI/FS).

The Remedial Investigation revealed that the upper terrace and other small areas of the landfill are primarily contaminated with chlorinated solvents. These solvents are causing groundwater contamination beneath the landfill and in a small area downgradient from the landfill. In addition, these solvents are entering an adjacent stream in small quantities. Several nearby residential wells were monitored and no impacts from the site were detected. The area along the adjacent stream contains large quantities of solid waste, with waste in the stream bed at some locations.

The Feasibility Study concluded that properly capping the site in accordance with NYSDEC Part 360 landfill regulations would be an appropriate response. In addition, the largest source of solvents, the upper terrace, could be effectively remediated utilizing soil vapor extraction (SVE) technology. The FS also determined that a separate groundwater remediation system would not be necessary since the area of offsite contamination is relatively small and is not impacting any residential wells. By properly capping the landfill to reduce the amount of precipitation that percolates through the waste and removing contamination from the upper terrace, the offsite groundwater quality should improve. In addition, the FS recommended consolidating the waste from along the stream bank and relocating it elsewhere in the landfill.

Upon completion of the RI/FS, the Department issued a Proposed Remedial Action Plan describing a proposed remedy for the site. After incorporating comments from a public meeting and several written comments, the remedy was finalized in the Record of Decision during March 1998. The elements of the selected remedy were as follows:

1. A remedial design program to verify the components of the conceptual design and provide the details necessary for the construction, operation and maintenance, and monitoring of the remedial program.
2. A landfill cover system designed to meet the substantive requirements of 6 NYCRR Part 360.
3. The extent of waste consolidation would be evaluated during design of the remedy. The primary factors to consider during design would include the extent to which consolidation would minimize the potential for future releases of hazardous waste constituents to the environment and the beneficial impacts of consolidation on the long-term operation and maintenance of the remedy.
4. Removal/treatment (likely by soil vapor extraction) of VOC contaminants from the upper terrace of the landfill.
5. Since the remedy would result in some untreated hazardous waste remaining at the site, a long term monitoring program would be instituted. A number of existing monitoring wells along with nearby residential wells would be monitored to confirm that the off-site groundwater quality does not

deteriorate. In the unlikely event that off-site groundwater quality does deteriorate, additional corrective measures would need to be evaluated.

3.0 CURRENT STATUS

The site is currently in the beginning stages of the Remedial Design. Mercury Aircraft has entered into an Administrative Order on Consent with the Department to design and construct the remedy. During negotiations for the consent order, Mercury Aircraft approached the Department with an alternative approach to the remedy from the one specified in the ROD. Specific differences from the original remedy are highlighted below.

4.0 DESCRIPTION OF SIGNIFICANT DIFFERENCES

4.1 New Information

One of the site's responsible parties, Mercury Aircraft, has approached the Department and offered to design and implement the site's remedy. The offer to implement the remedy included a proposal to add a feature to collect and treat groundwater combined with a more permeable cover system.

4.2 Comparison of Changes with Original Remedy

Mercury Aircraft proposed a remedy that includes the major components of the remedy specified in the ROD with the following modifications:

1. Test pit investigations at the site indicate that much of the existing landfill cover system has significant thickness and low permeability. Therefore, in lieu of consolidating a large amount of waste and constructing a generic Part 360 cover over the entire site, existing cover soils will be supplemented with additional cover soil as necessary to ensure a minimum 24 inches of soil over the waste material. Specifically, a minimum of 18 inches of low-permeability soils will be covered by at least six inches of topsoil to ensure sustainable growth of vegetative cover. Where appropriate and sufficiently thick, existing low-permeability cover materials will be left in place and augmented with topsoil as necessary. These cover soils will act as a physical barrier to any direct contact with the waste materials.

There will be no change to the number of gas vents that will be installed (one per acre, minimum). Final grading of the landfill cover will meet all the normal requirements of maximum and minimum slopes (33% and 4%, respectively).

2. The proposed remedy will still include soil vapor extraction of the upper terrace source area. This measure will remove a significant portion of the source material causing the groundwater contamination. Once completed, the concentrations of groundwater contamination beneath the landfill should be reduced.
3. Because the modified cover system will allow greater percolation through the waste mass, Mercury Aircraft is willing to install a groundwater collection and treatment system to remove the chlorinated

solvents from the groundwater. It is important to note that currently, under uncontrolled conditions, the offsite groundwater plume is not very large and is not impacting any residential users. Because of this, the Department did not include a groundwater treatment system in the remedy because it believes a Part 360 cover system would further reduce the amount of contamination leaving the site.

Mercury Aircraft has used an EPA computer model to estimate the beneficial impact a Part 360 cover system would have on percolation and, in turn, the groundwater plume. They determined that a Part 360 cover system could reduce offsite contaminant levels by approximately 60%. Based on this modeling, Mercury Aircraft will design the combination groundwater treatment system and landfill cover to ensure at least the same amount of contaminant reduction as a generic Part 360 cover.

The groundwater treatment system will be installed along the downgradient perimeter of the site, parallel to the unnamed stream. It will collect and treat the groundwater before leaving the site and will be designed to operate continuously.

The groundwater treatment system will not collect all contaminated groundwater and treat it to meet water quality standards. However, it will treat the groundwater sufficiently to ensure that the amount of contamination leaving the site will be equal to or less than if the remedy specified in the ROD were constructed. When combined with the soil vapor extraction system, the amount of contamination leaving the site will be considerably reduced.

4. The remedy will still include measures for the protection of the adjacent unnamed stream. Sections of the stream that pass within fifteen feet of the toe of the landfill will be protected from erosion with a combination of geotextile and riprap. The protection in these areas will be placed in the stream bed and along the bank of the landfill to above the 100-year flood elevation. Some amount of waste consolidation along the stream and landfill bank will still be necessary. All wastes that are near or exposed on the surface or that are too close to the stream bed will be consolidated and/or sufficiently protected from entering the stream.
5. Because the performance of the modified remedy would be more dependent on long-term operations and maintenance (O&M) than the original remedy, Mercury Aircraft will prepare a detailed Performance Analysis and Design Modification Plan. This document will ensure that the remedy is effective in meeting its goals. If the groundwater treatment performance criteria are not met, the Plan will outline what steps are necessary to ensure the design is modified and its performance improved.

The Department has reviewed these requested changes and consulted with the NYS Department of Health. Both agencies concur that these modifications are protective of human health and the environment.

5.0 SCHEDULE AND MORE INFORMATION

Mercury Aircraft has entered into an Administrative Order on Consent with the Department for the completion of Remedial Design, Construction, and O&M. The design phase should be completed this spring, with construction beginning shortly thereafter.

If you have questions or need additional information you may contact any of the following:

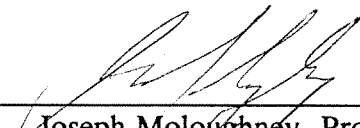
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APPROVED:

3/10/99
Date



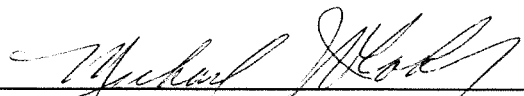
Joseph Moloughney, Project Manager
Bureau of Western Remedial Action

3/10/99
Date



Edward Belmore, Director
Bureau of Western Remedial Action

3/12/99
Date



Michael J. O'Toole, Jr., Director
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