



**CONESTOGA-ROVERS
& ASSOCIATES**

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DSS QJ

Scan _____

October 27, 2005

Reference No. 17948

Mr. David Szymanski
Environmental Engineering Technician III
New York State Department of Environmental Conservation - Region 9
Division of Environmental Remediation
270 Michigan Avenue
Buffalo, NY 14203-2999

REC-10
NOV - 3 2005
NYSDEC REC-1
FOIL
REL UNREL

Dear Mr. Szymanski:

Re: Update Report
Ellison Bronze Site, Falconer, New York

This report presents the post remedial activities that have been performed for the Ellison Bronze Site in Falconer, New York for 2005. All of the activities performed are as described in the Order on Consent that was signed by Ellison Bronze and the NYSDEC on June 13, 1995.

Site Inspections

Personnel from Ellison Bronze have been performing the site inspections of the remediated area to confirm that the area is environmentally sound.

During this year's inspection, the monitoring wells and stream bank were all found to be in satisfactory condition. No repairs were required. Copies of the 2005 inspection reports are attached.

As stated in the June 13, 2001 letter from the NYSDEC, annual inspections of these areas will continue.

Groundwater Monitoring

As previously agreed, the groundwater monitoring is now conducted every other year. The next scheduled sampling event will be conducted in 2006.

Other

Ellison Bronze is in receipt of your letter of January 31, 2005 wherein the request to have the groundwater monitoring at the site eliminated has been denied. The request was based on the fact that the site groundwater was never impacted by the fill material placed at the site even

REGISTERED COMPANY
ISO 9001
ENGINEERING DESIGN



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before the remedy was implemented. Consequently, there will never be a groundwater concern at this site. To assist us in understanding your position, could you please provide the reference in the regulations specifying that groundwater monitoring **MUST** be a component of a post remediation operation, monitoring, & maintenance plan. We have been unable to identify such a regulation.

Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

James Kay

JKK/cb/2

Encl. Inspection Reports

c.c.: Kim Peterson

TABLE C.1

SEMI-ANNUAL INSPECTION CHECKLIST
LONG-TERM MONITORING PLAN
ELLISON BRONZE SITE
FALCONER, NEW YORK

Date:

4-11-05

Inspection Personnel:

William HASKINS

Inspection Item	Condition		
	Good	Satisfactory	Poor-Repairs Required
A. Paved Areas	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B. Grassed Areas	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C. Stream Banks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D. Monitoring Wells	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

TABLE C1

SEMI-ANNUAL INSPECTION CHECKLIST
LONG-TERM MONITORING PLAN
ELLISON BRONZE SITE
FALCONER, NEW YORK

Date:

10-18-05

Inspection Personnel:

William HASKINS

<u>Inspection Item</u>	<u>Condition</u>		
	<u>Good</u>	<u>Satisfactory</u>	<u>Poor-Repairs Required</u>
A. Paved Areas	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B. Grassed Areas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C. Stream Banks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D. Monitoring Wells	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:
