

DSS 100

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**CONESTOGA-ROVERS  
& ASSOCIATES**

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November 14, 2007

Mr. David Szymanski  
New York State Department of Environmental Conservation  
270 Michigan Avenue  
Buffalo, NY 14203-2999

Reference No. 017948  
**RECEIVED**  
NOV 20 2007  
NYSDEC REG 9  
FOIL  
REL  UNREL

Dear Mr. Szymanski:

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

This report presents the post remedial monitoring activities that have been performed for the Ellison Bronze Site in Falconer, New York for 2007. All of the activities performed have been completed in accordance with terms specified in the Order on Consent that was signed by Ellison Bronze and the NYSDEC on June 13, 1995.

**GENERAL BACKGROUND**

The site was remediated in 1995. The remedy consisted of the excavation and stabilization of approximately 1,400 cubic yards of lead contaminated foundry waste and 60 cubic yards of copper contaminated stream sediment. The materials were stabilized with Portland cement and tested using aggressive TCLP methods to confirm that the stabilized material would not leach any deleterious material. All data were reviewed and approved by the NYSDEC prior to backfilling.

Following backfilling of all stabilized materials, the area was paved to further eliminate the potential for contact with the stabilized materials.

Commencing in November of 1996, and continuing through November of 2006, groundwater samples have been collected from the three on Site wells in accordance with the long term monitoring plan. As agreed in a letter dated June 13, 2001, the NYSDEC has approved a reduction in the groundwater monitoring program in that samples from the three wells need only be collected once, every two years. A subsequent letter from the NYSDEC dated December 15, 2006 has approved a further reduction in the groundwater sampling frequency to once, every three years. Consequently, the next sampling event will occur late in the year 2009.

The purpose of this report is to provide an update on the status of the Site and its condition. This report covers the period January 2007 through December 2007.





## **POST STABILIZATION GROUNDWATER MONITORING**

Groundwater sampling was last performed on October 19, 2006 in accordance with the Long-Term Monitoring Plan contained in the "Soil/Sediment Stabilization Summary Report, Dowcraft Corporation, Ellison Bronze Site, Falconer, New York". Three monitoring wells were sampled (ESI-1R, ESI-2, and ESI-3).

Purging was continued until sediment-free water was obtained. Sediment-free water was determined by both visual observation and the use of a field turbidimeter. Turbidity values of less than 2 NTU were obtained at all three sampling locations.

Each well was sampled for lead, barium, manganese, and iron. The samples were placed in a cooler with ice and shipped to the STL Laboratory in Pittsburgh PA on October 19, 2006 following chain-of custody procedures. Table 1 presents the 2006 analytical results for the groundwater samples.

The 2006 analytical results for each parameter were below New York State Class GA Groundwater Standards at all locations with the exception of manganese at location ESI-1R. The reported level of manganese, however, is similar to those detected during all previous sampling events (1996 through 2004) and is less than those reported at the same location during the Remedial Investigation in 1992. A historical summary for all sampling rounds is provided in Table 2.

## **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 inspections, the monitoring wells and grassed areas were found to be in good condition. In both the May and November inspections, there was one personal vehicle that had a slight oil/gas leak. This was cleaned up and the individual has had the repairs made to their vehicle to prevent this from continuing. The NYSDEC has requested that some additional stream bank protection be installed. Ellison Bronze is awaiting NYSDEC approval of its proposed plan to perform the repairs. Once the approval is obtained, the repairs will be made. Copies of the 2007 inspection reports are attached.

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



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### CONCLUSIONS & RECOMMENDATIONS

The groundwater concentrations from the samples collected in 2006 are the same as they have been for the previous 11 years. All of the data show that the lead contaminated materials have been suitably addressed from an environmental perspective and that no leaching of lead has or will occur. Consequently, it is concluded that the remediation of this Site has been successfully completed and that there is no need for continued groundwater monitoring of this Site. Two requests to the NYSDEC to allow the groundwater monitoring to end have been denied even though lead has never been at a level that poses any adverse risk and may not even be present at all.

In addition to the absence of lead in the groundwater beneath this Site during the 2006 sampling event:

- Lead was not present in the groundwater before the remediation took place;
- Lead was not present above the soil criteria in the soils directly beneath the fill material that was stabilized to control the lead (before the remediation took place); and
- Lead was not leachable from the stabilized soils at the time the stabilization was performed and this was conducted using an acidified TCLP procedure that reduces the pH to produce a very aggressive leaching potential that does not naturally exist at the Site.

Consequently, there is no reason to continue monitoring the groundwater at this Site.

Should there be any questions, please do not hesitate to contact me at 519-884-0510 or Kim Peterson of Ellison Bronze at 716-665-6522.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

A handwritten signature in cursive script that reads 'James Kay'.

James K. Kay

JKK/lw/4

Encl.

c.c.: Kim Peterson  
Dave Tyran

**TABLE 1**  
**ANALYTICAL RESULTS SUMMARY**  
**ELLISON BRONZE**  
**FALCONER, NEW YORK**  
**OCTOBER 2006**

<i>Location:</i>	<i>ESI-1R</i>	<i>ESI-2</i>	<i>ESI-3</i>
<i>Sample:</i>	WG-17948-101906-001	WG-17948-101906-002	WG-17948-101906-003
<i>Sample Date:</i>	10/19/2006	10/19/2006	10/19/2006

<i>Parameters</i>	<i>Units</i>			
<i>Metals</i>				
Barium	µg/L	128 J	159 J	189 J
Iron	µg/L	100 U	32.2 J	100 U
Lead	µg/L	3.0 U	3.0 U	3.0 U
Manganese	µg/L	339	68.9	4.6 J

Notes:

J	Estimated.
U	Non-detect at associated value.

TABLE 2

HISTORICAL ANALYTICAL RESULTS SUMMARY  
 GROUNDWATER SAMPLING  
 LONG-TERM MONITORING PROGRAM  
 DOWCRAFT CORPORATION, ELLISON BRONZE SITE  
 FALCONER, NEW YORK

Class GA Groundwater Standard (mg/L)	ESI-IR									
	1996	1997	1998	1999	2000	2002				
Total Lead	ND (0.005)/ND (0.005)	ND (0.002)/ND (0.002)	ND (0.003)/ND (0.003)	ND (0.002)/ND (0.002)	ND (0.005)/ND (0.005)	ND (0.005)/ND (0.005)	ND (0.005)/ND (0.005)	ND (0.005)/ND (0.005)	ND (0.005)/ND (0.005)	ND (0.005)/ND (0.005)
Total Barium	0.17/0.16	0.177/0.174	0.207/0.206	0.232/0.230	0.252/0.259	0.201/0.202	0.151/0.148	0.151/0.148	0.151/0.148	0.128J
Total Iron	0.15/0.14	ND (0.06)/ND (0.06)	0.115/0.153	0.222/0.175	0.132/0.114	0.0998J/0.103J	ND (0.2)/ND (0.2)	ND (0.2)/ND (0.2)	ND (0.2)/ND (0.2)	ND (0.10)
Total Manganese	2.4/2.4	2.45/2.41	1.81/1.81	2.13/2.13	3.08/3.13	2.78/2.78	1.390/1.350	1.390/1.350	1.390/1.350	0.339

TABLE 2

HISTORICAL ANALYTICAL RESULTS SUMMARY  
 GROUNDWATER SAMPLING  
 LONG-TERM MONITORING PROGRAM  
 DOWCRAFT CORPORATION, ELLISON BRONZE SITE  
 FALCONER, NEW YORK

Class GA Groundwater Standard (mg/L)	ESL-2							
	1996	1997	1998	1999	2000	2002	2004	2006
Total Lead	ND (0.005)	0.003	ND (0.003)	ND (0.002)	ND (0.005)	ND (0.005)	ND (0.005)	ND (0.003)
Total Barium	0.15	0.159	0.144	0.156	0.153	0.184	0.173	0.159]
Total Iron	0.09	ND (0.06)	ND (0.06)	0.062	ND (0.050)	ND (0.020)	ND (0.20)	0.032]
Total Manganese	0.17	0.086	0.02	0.058	0.030	0.0808	0.033	0.069

TABLE 2

HISTORICAL ANALYTICAL RESULTS SUMMARY  
 GROUNDWATER SAMPLING  
 LONG-TERM MONITORING PROGRAM  
 DOWCRAFT CORPORATION, ELLISON BRONZE SITE  
 FALCONER, NEW YORK

Class G/A Groundwater Standard (mg/L)	ESI-3							
	1996	1997	1998	1999	2000	2002	2004	2006
Total Lead	ND (0.005)	0.003	ND (0.003)	ND (0.002)	ND (0.005)	0.00165J	0.00212J	ND (0.003)
Total Barium	0.17	0.136	0.113	0.086	0.077	0.0799	0.247	0.189J
Total Iron	0.06	ND (0.06)	ND (0.06)	0.079	0.074	ND(0.200)	ND (0.20)	ND (0.10)
Total Manganese	0.007	ND (0.01)	ND (0.01)	0.005	ND (0.010)	0.00033J	ND (0.010)	0.005J

TABLE C.1

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

Date:

5-23-07

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C. Stream Banks	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D. Monitoring Wells	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Small surface oil & gas  
leak under one truck.



TABLE C.1

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

Date: 11-5-07  
 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C. Stream Banks	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D. Monitoring Wells	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Small surface leak cleaned-up  
Waiting for permission to  
repair the Stream Bank