



**CONESTOGA-ROVERS
& ASSOCIATES**

651 Colby Drive, Waterloo, Ontario, Canada N2V 1C2
Telephone: 519-884-0510 Facsimile: 519-884-0525
www.CRAworld.com

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October 22, 2008

Reference No. 017948

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

RECEIVED
OCT 27 2008
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 2008. All of the activities performed have been completed in accordance with the 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 2008 through December 2008.

REGISTERED COMPANY FOR
ISO 9001
CERTIFICATION DESIGN



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 April inspection, the grassed areas were found to be in good condition. The stream bank and monitoring wells were in satisfactory condition. The paved area was deemed to be in need of repair. As noted in previous correspondence, plans had been submitted and permit applications made to improve the stream bank stabilization. The permits were obtained this year and the stream bank erosion control barriers were upgraded and extended during the summer. In addition, the paved areas were patched in the areas identified as being in need of repair. The paved areas were also sealed and striped. The areas around the monitoring wells were also repaired in conjunction with the paving and grading improvements.



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As a result of the summer repairs, the October inspection found all items to be back in good condition. Copies of the April and October inspections are attached. In addition, photographs of the improvements to the streambank stabilization are also attached.

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

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 in the groundwater 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.



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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 black ink that reads 'James K. Kay'. The signature is written in a cursive, flowing style.

James K. Kay

JKK/cb/5
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

<i>Class GA Groundwater Standard (mg/L)</i>		<i>ESI-1R</i>							
		1996	1997	1998	1999	2000	2002	2004	2006
Total Lead	0.025	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)	0.00197J/0.00242J	ND (0.003)
Total Barium	1.0	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	0.128J
Total Iron	0.3	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 (0.10)
Total Manganese	0.3	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	0.339

TABLE 2
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GROUNDWATER SAMPLING
LONG-TERM MONITORING PROGRAM
DOWCRAFT CORPORATION, ELLISON BRONZE SITE
FALCONER, NEW YORK

	<i>Class GA Groundwater Standard (mg/L)</i>	<i>ESI-2</i>							
		1996	1997	1998	1999	2000	2002	2004	2006
Total Lead	0.025	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	1.0	0.15	0.159	0.144	0.156	0.153	0.184	0.173	0.159J
Total Iron	0.3*	0.09	ND (0.06)	ND (0.06)	0.062	ND (0.050)	ND (0.020)	ND (0.20)	0.032J
Total Manganese	0.3*	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

	<i>Class GA Groundwater Standard (mg/L)</i>	<i>ESI-3</i>							
		1996	1997	1998	1999	2000	2002	2004	2006
Total Lead	0.025	ND (0.005)	0.003	ND (0.003)	ND (0.002)	ND (0.005)	0.00165J	0.00212J	ND (0.003)
Total Barium	1.0	0.17	0.136	0.113	0.086	0.077	0.0799	0.247	0.189J
Total Iron	0.3*	0.06	ND (0.06)	ND (0.06)	0.079	0.074	ND(0.200)	ND (0.20)	ND (0.10)
Total Manganese	0.3*	0.007	ND (0.01)	ND (0.01)	0.005	ND (0.010)	0.0033J	ND (0.010)	0.005J

TABLE C.1

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

Date: 4-10-08

Inspection Personnel: William Has Kile

Inspection Item	Condition		
	Good	Satisfactory	Poor-Repairs Required
A. Paved Areas	☐	☐	☒
B. Grassed Areas	☒	☐	☐
C. Stream Banks	☐	☒	☐
D. Monitoring Wells	☐	☒	☐

Comments:

EROSION TO CREEKBANK TO BE
REPAIRED ONCE ALL APPROVALS
RECEIVED.

TABLE C.1

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

Date:

10-17-08

Inspection Personnel:

William HASKINS

<i>Inspection Item</i>	<i>Condition</i>		
	<i>Good</i>	<i>Satisfactory</i>	<i>Poor-Repairs Required</i>
A. Paved Areas	☒	☐	☐
B. Grassed Areas	☒	☐	☐
C. Stream Banks	☒	☐	☐
D. Monitoring Wells	☒	☐	☐

Comments:



