



**CONESTOGA-ROVERS
& ASSOCIATES**

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January 22, 2010

Reference No. 017948

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

Dear Mr. Szymanski:

Re: Periodic Review Report
Ellison Bronze Site (formerly Dowcraft), Falconer, New York
Site No. 907018

Pursuant to the New York State Department of Environmental Conservation letter dated September 18, 2009, this letter provides the 2009 Site Management Periodic Review Report for the Ellison Bronze Site (formerly Dowcraft) located at 125 West Main Street in Falconer, New York.

Introduction

The Ellison Bronze Site is an operating foundry producing brass doors and hardware. Historically, some of the foundry wastes were deposited at the back of the property. These wastes included metal filings, and being a brass foundry, resulted in some lead wastes that exceeded New York State criteria. The extent of the waste was delineated and remediated by stabilizing the waste with cement.

The remediation has been proven effective through the testing that was performed at the time the stabilization was performed in 1995 and with subsequent groundwater sampling that has proven that no lead leaches from the stabilized waste.

Ellison Bronze maintains the Site in accordance with the requirements of the NYSDEC approved post-remedy plan and performs corrective measures on an as-needed basis.

There is one recommended change to the program that is being proposed at this time. If it is necessary to continue the groundwater monitoring program for the Site, then preparation and submittal of the Periodic Review Period Reports to the NYSDEC should be adjusted to the same frequency as the groundwater monitoring events (i.e. once every three years).

All of the activities performed at the Site 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 and as amended by subsequent letters from the NYSDEC dated June 13, 2001 and December 15, 2006.

Site Overview

The Ellison Bronze Site is located in the developed area of Falconer at 125 West Main Street. The Site is bounded to the northwest by West Main Street; to the northeast by Moon Brook; to the southeast by Chadakoin River; and to the southwest by adjacent commercial and residential properties. The waste materials identified at the Site occupied an area approximately 60 feet by 130 feet in the southeast corner of the property along Moon Brook and Chadakoin River.

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 extent of impacted materials was identified in the investigations performed at the Site in the immediately preceding years. The results of the Site studies showed that there were no other impacts to the Site or the waterways other than the identified materials. There was no impact to the soils beneath the foundry waste and there was no impact on groundwater quality.

The impacted materials were stabilized with Portland cement in a mixer in small batches. Each batch was tested using aggressive TCLP methods to confirm that the stabilized material would not leach any deleterious material. All data from the stabilized material were reviewed and approved by the NYSDEC prior to backfilling. Samples were also collected from the base and sidewalls of the excavation to confirm that all lead impacted waste and copper impacted sediment had been removed.

Following backfilling of the stabilized materials, the area was repaved to match previous conditions and to further eliminate the potential for contact with the stabilized materials.

The banks along Moon Brook and Chadakoin River were stabilized with large stone, concrete barriers, and topsoil / vegetation as appropriate to match the topographic conditions along each portion of the waterway.

There have been no releases from the stabilized material since completion of the remediation in 1995 and thus the remedy has met the cleanup goals and closure requirements.

There have been no changes to the remedy since 1995 other than routine maintenance activities.



Evaluate Remedy Performance, Effectiveness, and Protectiveness

As evidenced by the groundwater data collected at the Site, there have been no releases of lead from the stabilized waste. Consequently, the remedy is performing as designed and is effective and protective of human health and the environment.

Further, given that there was never a release to the groundwater, even before the remedy was implemented, there never will be a release from the waste in its stabilized condition in the future.

Monitoring Plan Compliance

Commencing in November of 1996, and continuing through December of 2009, 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, a groundwater sampling event was conducted in 2009.

Groundwater sampling was performed on December 8, 2009 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 5 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 TestAmerica Laboratory in Pittsburgh PA on December 8, 2009 following appropriate chain-of custody procedures. Table 1 presents the 2009 analytical results for the groundwater samples.

The 2009 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 2006) 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.



In accordance with the current schedule, the next sampling event will occur late in the year 2012.

Operation & Maintenance Plan Compliance

In accordance with the Long-Term Monitoring Plan contained in the "Soil/Sediment Stabilization Summary Report, Dowcraft Corporation, Ellison Bronze Site, Falconer, New York", semi-annual inspections are made of the paved areas, grass area, stream banks, and on-Site monitoring wells. Copies of the semi-annual inspection reports are attached. The reports show that all of the inspected Site features are in good to satisfactory condition. Consequently, no repairs or maintenance were required in 2009.

Overall Conclusions and Recommendations

All of the required work was completed and is reported herein. The remedy has effectively isolated and secured the waste material and there is no risk to human health or the environment.

The groundwater concentrations from the samples collected in 2009 are the same as they have been for the previous 13 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.

It is further concluded that if it is necessary to continue the groundwater monitoring program, that preparation and submittal of the Periodic Review Period Reports to the NYSDEC should be adjusted to the same frequency as the groundwater monitoring events (i.e. once every three years).

As required, a completed copy of the Site Management Periodic Review Report Notice – Institutional and Engineering Controls Certificate Form is attached.



**CONESTOGA-ROVERS
& ASSOCIATES**

January 22, 2010

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

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

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

James K. Kay

JKK/cb/6

Encl.

cc: Mark Graves
Dave Tyran

TABLE 1

ANALYTICAL RESULTS SUMMARY
ELLISON BRONZE
FALCONER, NEW YORK
DECEMBER 2009

Parameters	Units	Location:			
		Sample:			
		Sample Date:			
		ESI-1R	ESI-2	ESI-3	ESI-3
		WG-17948-120809-001	WG-17948-120809-002	WG-17948-120809-003	WG-17948-120809-004
		12/08/2009	12/08/2009	12/08/2009	12/08/2009
					(field duplicate)
<i>Metals</i>					
Barium	µg/L	211	77.8 J	352	348
Iron	µg/L	143	25.4 J	36.6 J	37.1 J
Lead	µg/L	3.0 U	3.0 U	3.0 U	3.0 U
Manganese	µg/L	1620	74.2	7.3 J	7.0 J

Notes:

J Estimated.

U Not detected.

Based upon comparison to historic data, it is apparent that the analytical data from samples 001 (ESI-1R) and 002 (ESI-2) have been switched. This table presents the data in its corrected format.

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-1R								
	1996	1997	1998	1999	2000	2002	2004	2006	2009
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)	0.00197/0.00242]	ND (0.003)	ND (0.003)
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	0.128]	0.211
Total Iron	0.15/0.14	ND (0.06)/ND (0.06)	0.115/0.153	0.222/0.175	0.132/0.114	0.0998]/0.103]	ND (0.2)/ ND (0.2)	ND (0.10)	0.143
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	0.339	1.620

TABLE 2
HISTORICAL ANALYTICAL RESULTS SUMMARY
GROUNDWATER SAMPLING
LONG-TERM MONITORING PROGRAM
DOWCRAFT CORPORATION, ELLISON BRONZESITE
FALCONER, NEW YORK

Class GA Groundwater Standard (mg/L)	ESI-2								
	1996	1997	1998	1999	2000	2002	2004	2006	2009
Total Lead	0.025	ND (0.005)	0.003	ND (0.003)	ND (0.002)	ND (0.005)	ND (0.005)	ND (0.003)	ND (0.003)
Total Barium	1.0	0.15	0.159	0.144	0.156	0.153	0.173	0.159J	0.078J
Total Iron	0.3	0.09	ND (0.06)	ND (0.06)	0.062	ND (0.050)	ND (0.20)	0.032J	0.025J
Total Manganese	0.3	0.17	0.086	0.02	0.058	0.030	0.033	0.069	0.074



Enclosure 1
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



Site Details		Box 1
Site No.	907018	
Site Name	Ellison Bronze Company	
Site Address:	125 West Main Street	Zip Code: 14733
City/Town:	Falconer	
County:	Chautauqua	
Allowable Use(s) (if applicable, does not address local zoning):	Industrial	
Site Acreage:	2.6	
Owner:	Dowcraft Corp Ellison Bronze, Inc. 125 Main St., Falconer, NY 14733	
Reporting Period:	June 15, 2008 to June 15, 2009 January 1, 2009 to December 31, 2009	

Verification of Site Details		Box 2	
		YES	NO
1. Is the information in Box 1 correct?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
If NO, are changes handwritten above or included on a separate sheet?		<input checked="" type="checkbox"/>	
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
If YES, is documentation or evidence that documentation has been previously submitted included with this certification?		<input type="checkbox"/>	
3. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
If YES, is documentation (or evidence that documentation has been previously submitted) included with this certification?		<input type="checkbox"/>	
4. If use of the site is restricted, is the current use of the site consistent with those restrictions?	Industrial	<input checked="" type="checkbox"/>	<input type="checkbox"/>
If NO, is an explanation included with this certification?		<input type="checkbox"/>	
5. For non-significant-threat Brownfield Cleanup Program Sites subject to ECL 27-1415.7(c), has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?	Not Applicable	<input type="checkbox"/>	<input type="checkbox"/>
If YES, is the new information or evidence that new information has been previously submitted included with this Certification?		<input type="checkbox"/>	
6. For non-significant-threat Brownfield Cleanup Program Sites subject to ECL 27-1415.7(c), are the assumptions in the Qualitative Exposure Assessment still valid (must be certified every five years)?	Not Applicable	<input type="checkbox"/>	<input type="checkbox"/>
If NO, are changes in the assessment included with this certification?		<input type="checkbox"/>	

SITE NO. 907018

Box 3

Description of Institutional Controls

Parcel

Institutional Control

S_B_L Image: 105-18-19.3

Monitoring Plan

Description of Engineering Controls

Box 4

None Required

Attach documentation if IC/ECs cannot be certified or why IC/ECs are no longer applicable.
(See instructions)

Control Description for Site No. 907018

Parcel: 105-18-19.3

- Deed Restriction per Order On Consent (6/13/1995)
- Record of Decision (3/1996): Semi-Annual Inspection and Annual Groundwater Sampling. (Modified to annual inspection and tri-annual groundwater sampling with DEC R9 concurrence.)

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted

YES NO

☒ ☐

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

(a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

☒ ☐

3. If this site has an Operation and Maintenance (O&M) Plan (or equivalent as required in the Decision Document);

I certify by checking "YES" below that the O&M Plan Requirements (or equivalent as required in the Decision Document) are being met.

☒ ☐

4. If this site has a Monitoring Plan (or equivalent as required in the remedy selection document);

I certify by checking "YES" below that the requirements of the Monitoring Plan (or equivalent as required in the Decision Document) is being met.

YES NO

☒ ☐

IC CERTIFICATIONS
SITE NO. 907018

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 2 and/or 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I MARK A. GRAVES at 125 WEST MAIN STREET, FALCONER, NY
print name print business address

am certifying as ELLISON BRONZE, INC. (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.



Signature of Owner or Remedial Party Rendering Certification

1/25/10
Date

IC/EC CERTIFICATIONS

Box 7

QUALIFIED ENVIRONMENTAL PROFESSIONAL (QEP) SIGNATURE

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I _____ at _____
print name print business address

am certifying as a Qualified Environmental Professional for the _____

(Owner or Remedial Party) for the Site named in the Site Details Section of this form.

Signature of Qualified Environmental Professional, for
the Owner or Remedial Party, Rendering Certification

Stamp (if Required)

Date

TABLE C.1

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

Date:

4-3-09

Inspection Personnel:

William, Haskins
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

TABLE C.1

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

Date:

11-9-09

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

Comments:
