



November 25, 2020

Reference No. 11221226

Ms. Megan Kuczka
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, NY 14203-2999

Dear Ms. Kuczka:

**Re: Revised Soil/Sediment Stabilization Summary Report-Section 6.0 Long-Term
Monitoring Plan
Ellison Bronze Company, Falconer, New York
NYSDEC Site Number 907018**

In response to the New York State Department of Environmental Conservation's (NYSDEC's) request, GHD is submitting the attached revised Section 6.0 of the Site Soil/Sediment Stabilization Summary Report - Long-Term Monitoring Plan (January 1996) on behalf of Ellison Bronze Company located in Falconer, New York (Site).

As stated by the NYSDEC in a letter to Ellison Bronze Company dated October 15, 2020, the existing Long-Term Monitoring Plan (presented in Section 6.0 of the Soil/Sediment Stabilization Summary Report) is out of date. GHD has updated the Long-Term Monitoring Plan to reflect the current approved sampling and reporting frequencies at the Site. The updates are presented in redline so that the NYSDEC knows what parts of Section 6.0 have been updated.

The modified Section 6.0-Long-Term Monitoring Plan is attached. Please add this revised Section to your copy of the Soil/Sediment Stabilization Summary Report. Should there be any questions, please do not hesitate to contact myself at 716-205-1975 or Mr. Matthew Kirkpatrick of Ellison Bronze Company at 716-665-6522.

Sincerely,

GHD

A handwritten signature in black ink, appearing to read "Shaun McEvoy", written in a cursive style.

Shaun McEvoy
SM/adh/1

Encl.

cc: Matthew Kirkpatrick, Ellison Bronze Company
Richard Snyder, GHD

6.0 LONG-TERM MONITORING PLAN

Groundwater samples will be collected from the three on-Site monitoring wells (ESI-1, ESI-2 and ESI-3) and analyzed for lead (USEPA) Method No. SW846-7421). Monitoring well ESI-1, destroyed during the soil stabilization program and has been replaced. Samples will be collected annually for a period of five years. The first set was required to be collected within 90 days of completion of the soil stabilization program. As the excavation area was paved on August 21, 1995, the groundwater samples were collected on November 19, 1995. Analytical results from each year's sampling event will be submitted to the NYSDEC within 90 days of sampling. Samples will be collected using low rate pumping designed to collect sediment-free samples. At the end of the five-year program or upon a change in Site classification by the NYSDEC, an evaluation of the need for continued monitoring will be submitted to the NYSDEC.

Site groundwater wells were sampled annually from 1996 through 2000, then once every 2 years from 2000 through 2006, and once every 3 years from 2006 through 2015. The groundwater sampling results have been reported to the New York State Department of Environmental Conservation (NYSDEC) as part of the Periodic Review Reports (PRRs) that have been submitted at the same frequency. As stated in the NYSDEC's 2015 PRR Acceptance Letter (dated March 17, 2016), the frequency of periodic reviews from the site was extended from a 3-year period to the current 5-year period. Therefore, groundwater sampling events will continue at 5-year intervals, resuming in 2020 and continuing thereafter. Prior to the 2015 sampling, three groundwater wells were sampled during every sampling event; however, one of the historical wells (ESI-3) had been covered with a concrete apron prior to 2015.

In addition to the annual groundwater sampling, the following additional monitoring tasks will be performed:

- i) Semi-annual inspections (to be conducted in April and October of each year) of the paved areas, grass area, stream banks and on-site monitoring wells will be conducted;
- ii) Appropriate repairs will be made within 60 days of inspection (weather permitting); and
- iii) Records of inspections and repairs will be kept on file at the Plant.

Table C.1, provided in Appendix C, will be used as a check list for the semi-annual inspections to be maintained at the Plant.