



Notice of U.S. Environmental Protection Agency's Determination to Not Take Superfund Action at LCP Bridge Street Operable Unit 2 and Wastebeds 9 to 15 Onondaga Lake Areas of Concern

EPA
Region 2

October 2010

INTRODUCTION

The Onondaga Lake Superfund Site consists of Onondaga Lake and its tributaries and upland areas that contribute or have contributed contamination to Onondaga Lake. Currently, twelve areas of concern have been determined to be part of the Onondaga Lake Superfund Site. This Notice is intended to solicit public comment on the Environmental Protection Agency's (EPA's) determination to not take federal Superfund action at two areas, which have been evaluated, but are not included in the twelve areas of concern noted above. These two areas of concern are LCP Bridge Street Operable Unit 2 (OU2)¹ and Wastebeds 9 to 15 (see the attached figure for the location of the areas of concern).

Because there is no identified pathway for Site-related contamination to migrate from either the LCP Bridge Street OU2 or Wastebeds 9 to 15 areas of concern to Onondaga Lake, no action is required under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 as amended (CERCLA), 42 U.S.C. §9601, *et seq.* The fact that no federal Superfund response action is anticipated regarding these areas of concern does not in any way affect what is considered to be the Onondaga Lake Superfund Site. In addition, this determination does not preclude New York State from taking actions at these areas under its authorities, as appropriate.

¹ An operable unit (OU) is defined as a discrete action that comprises an incremental step toward comprehensively addressing site problems. This discrete portion of a remedial response manages migration, or eliminates or mitigates a release, threat of a release, or pathway of exposure. The cleanup of a site can be divided into a number of OUs, depending on the complexity of the problems associated with the site. OUs may address geographical portions of a site, specific-site problems, or initial phase of an action, or may consist of any set of actions performed over time or any actions that are concurrent but located in different parts of a site.

DETERMINATION TO NOT TAKE SUPERFUND ACTION

LCP Bridge Street Operable Unit 2

The LCP Bridge Street area of concern is situated approximately 2 miles northwest of the City of Syracuse, in the Town of Geddes, Onondaga County, New York. The approximately 20-acre property is located in an industrial area on Gere Lock Road, west of Bridge Street (Route 297), and south of the New York State Fairgrounds and an active railroad right-of-way. A scrap yard is located north of the property, a cogeneration facility is located to the west, and the former NAKOH Chemical facility is located to the northeast.

The LCP Bridge Street Site consists of two OUs². OU1 consists of approximately 18 acres of the facility. Since it was determined that OU1 has impacted the Onondaga Lake Site, actions under CERCLA were performed to address those impacts. A Record of Decision was issued in September 2000 which selected a remedy for OU1. The major components of the selected remedy included the following:

- removal of tanks, containers and transformers;
- building demolition;
- sediment excavation and restoration of the West Flume and wetlands;
- soil washing, which reclaimed approximately 8 tons of elemental mercury;
- soil excavation of the Brine Mud Area and North Ditch;
- excavation of pipes and sewers, which provided preferential pathways for contamination to enter into the West Flume; and
- installation of a slurry wall, groundwater collection and cap system.

² LCP Bridge Street OU1 and OU2 are New York State Department of Environmental Conservation (NYSDEC) designations. LCP Bridge Street OU1 is equivalent to EPA's LCP Bridge Street OU5.

All of the remedial work at OU1 has been completed with the exception of the final cap (a temporary cap is currently in place) and some limited soil excavation work.

OU2 consists of a 1.7-acre area where a former hydrogen peroxide plant was located at the facility. This area is north of the West Flume (a man-made stream), south of the New York State Fairgrounds, a scrap metal recycling facility and an active railroad right-of-way, east of an area of OU1 called the brine mud area, and west of the former NAKOH Chemical facility.

In September 2002, under a consent order with NYSDEC, Honeywell, a potentially responsible party, commenced a remedial investigation and feasibility study (RI/FS) for LCP Bridge Street OU2. During the RI, sediment, soil, groundwater and surface water samples were collected and analyzed. The results of the RI indicate that the historical use of xylene at the facility contaminated the groundwater, which migrates to the West Flume. Localized contamination of sediment in the West Flume has resulted. The concentration of xylene, however, rapidly decreases downstream of the facility and does not extend to the mouth of the West Flume, which in turn flows into Geddes Brook, then into Ninemile Creek, and ultimately into Onondaga Lake. The contaminated sediments in the West Flume were addressed as part of the OU1 remedy.

In March 2010, following the completion of the RI/FS, NYSDEC selected a remedy for LCP Bridge Street OU2 under state authorities. The major components of that remedy include:

- Injection of chemical oxidants into the ground to treat the contaminated soil and groundwater;
- Construction of a cover to prevent contact with contaminated soils and migration via storm water runoff;
- Development of a site management plan;
- Imposition of an environmental easement to (a) limit the use and development of the property to commercial/industrial use; (b) insure compliance with the site management plan; and (c) restrict the use of groundwater for drinking; and
- Long-term monitoring.

NYSDEC is currently negotiating a consent order with Honeywell for the design and implementation of the selected remedy.

Wastebeds 9 to 15

Wastebeds 9 to 15 are former liquid waste lagoons located on 670 acres in the Town of Camillus which received process wastes from Allied Chemical's (predecessor to

Honeywell International Inc. or Honeywell) manufacturing operations from 1944 to 1986. The Wastebeds are located adjacent to Ninemile Creek, a major tributary to Onondaga Lake. The waste in the former lagoons is primarily nonhazardous calcium carbonate/chlorides from the manufacturing of soda ash using the Solvay Process. In addition, wastes from the Bridge Street Chlor-alkali plant, consisting of spilled materials, mercury, asbestos, lead, and wash water, and wastes from the chlorinated benzene manufacturing at the Willis Avenue plant, consisting of asbestos, wash water, spilled material, lead, mercury, and heavy organic residues, were disposed of here. Other substances disposed of at the Wastebeds include fly and bottom ash from the Allied Chemical plants, sewage sludge from the County's wastewater treatment plant, Anheuser-Busch brewery sludge, and brine purification muds. Wastebed 15 also received demolition debris and soil from decommissioning the Allied Chemical main plant. A portion of the old Erie Canal, which lies beneath Wastebed 15, was used as a landfill by the Town of Camillus. Under authorization from NYSDEC, the Town of Camillus operates a construction and demolition waste landfill in portions of Wastebed 15.

Most of the surface of the Wastebeds is covered with a variety of vegetation, including grasses, brush, and trees.

The groundwater under the Wastebeds is highly saline due to the leaching of salts from the Solvay waste. A hydrogeological assessment was performed between 1987 and 1989 to evaluate groundwater and nearby surface water quality near the Wastebeds. A Supplemental Site Investigation was conducted in 1998. Contaminants that were identified include relatively low concentrations of volatile organic compounds, phenols, and metals, including mercury. While contaminants were detected in the sediments and surface water in seeps and swales located adjacent to the Wastebeds and in Ninemile Creek, it is likely that these contaminants were released when the lagoons were in operation and/or released from the former LCP Bridge Street facility. While hazardous substances are present at the Wastebeds, the available data indicates that the levels of contaminants from the Wastebeds that are present in Ninemile Creek are minimal and that the Wastebeds do not impact Onondaga Lake. Specifically, water samples collected from Geddes Brook and Ninemile Creek indicated that mercury contamination in the water column is mainly confined to the reaches below the source at the LCP Bridge Street plant. Data from sediment samples collected around Wastebeds 9 to 15 indicated that groundwater and runoff of sediment from the Wastebeds is not contributing to the high concentrations of mercury seen in the sediments downstream of the Geddes Brook discharge. Data collected for the Geddes Brook/Ninemile Creek RI indicate that the upper reaches of the streams (*i.e.*, Geddes Brook upstream of the West

Flume; and Ninemile Creek upstream of the Geddes Brook discharge), are not significant sources of mercury and other CERCLA contaminants to the lower reaches of the streams. Surface water sampling during the Geddes Brook/Ninemile Creek RI also indicated that the West Flume and the sediments downstream of the West Flume were significant sources of mercury to surface water. Overall, the data collected during the Geddes Brook/Ninemile Creek RI/FS and Geddes Brook/Ninemile Creek OU1 Supplemental FS indicate that contamination from Honeywell operations was primarily confined to the lower reaches of Geddes Brook and Ninemile Creek), and that surface water and sediment concentrations of mercury in the upper reaches of Geddes Brook and Ninemile Creek were generally consistent with non-point sources (e.g., urban runoff), thus, not warranting remediation. It should be noted, however, that results from an investigation of a drainage ditch which adjoins Geddes Brook upstream of the culverts beneath the Conrail railroad tracks indicate that elevated levels of mercury are present in sediment and floodplain soils. The presence of contamination in the drainage ditch appears to be the result of backflow from Geddes Brook and/or historic overflows from the Wastebeds when they were in use as settling basins. Contaminated sediments and floodplain soil in and near the drainage ditch will be addressed under the Geddes Brook Interim Remedial Measure prior to remediating contaminated channel sediment and floodplain soil/sediment in and adjacent to the lower reach of Geddes Brook.

NYSDEC is currently negotiating a consent order with Honeywell for an engineered cover and long-term maintenance and monitoring of Wastebeds 9 to 15 to mitigate environmental concerns.

It should be noted that sediments removed from Onondaga Lake as part of the Lake Bottom remedy will be dewatered and permanently stored in an engineered Sediment Consolidation Area (SCA) located on Wastebed 13.

CONCLUSION

Based on the foregoing, EPA, with NYSDEC's concurrence, has concluded that no federal Superfund response actions are required at LCP Bridge Street OU³ and at Wastebeds 9 to 15. Both potential areas of concern are being or will be addressed under state authorities.

³ LCP Bridge Street OU1, which is an identified source of contamination to Onondaga Lake, has been addressed through a nearly completed Superfund response action.

It should be noted that pursuant to CERCLA requirements, the Onondaga Lake Bottom Site remedy will be reviewed not less than once every five years (beginning August 2015) to ensure that it remains protective of human health and the environment. This review, which will be summarized in a "Five-Year Review Report," will be based upon an evaluation of the results from monitoring of the remedy. An assessment of the protectiveness of the SCA on Wastebed 13 will be included in that evaluation.

SUPPORTING DOCUMENTATION

Documentation in support of this determination includes the following:

- *Environmental Assessment of Lower Reaches of Ninemile Creek and Geddes Brook, Oswego Watershed, New York*. Prepared for AlliedSignal, Solvay, NY by CDR Environmental Specialists, Stow, MA. July 1991;
- *Summary Data Report*, Allied Wastebeds 9 to 15 and Lower Nine Mile Creek Valley, Blasound, Bouck & Lee, July 1995;
- *Onondaga Lake RI/FS West Flume Mercury Investigation and Supplemental Sampling and Ninemile Creek Supplemental Sampling Data Report*. Prepared for AlliedSignal, Inc., Syracuse, NY by PTI Environmental Services, Bellevue, WA., 1996;
- *Supplemental Site Investigation Report, Wastebeds 9 to 15*, Blasound, Bouck & Lee, August 1999;
- *Wastebeds 9-15 Subsite Evaluation*, NYSDEC, June 2000;
- *Record of Decision, LCP Bridge Street Subsite*, NYSDEC, September 2000;
- *Remedial Investigation Report, Onondaga Lake*, TAMS, December 2002;
- *Remedial Investigation Report, Geddes Brook/Ninemile Creek*, TAMS/EarthTech, July 2003;
- *LCP Bridge Street OU2 Subsite Evaluation*, NYSDEC, February 2004;
- *Feasibility Study, Onondaga Lake*, Parsons, November 2004;
- *Record of Decision, Onondaga Lake Bottom Subsite*, NYSDEC and EPA, July 2005;
- *Feasibility Study, Geddes Brook/Ninemile Creek*, Parsons, May 2005;
- *Supplemental Feasibility Study, Geddes Brook/Ninemile Creek OU1*, Parsons, November 2008;
- *Record of Decision, Geddes Brook/Ninemile Creek Site OU1*, NYSDEC and EPA, April 2009;

- *Supplemental Feasibility Study, Geddes Brook/Ninemile Creek OU2*, Parsons, May 2009;
- *LCP Bridge Street Subsite, Five-Year Review*, EPA, October 2009;
- *Record of Decision, Geddes Brook/Ninemile Creek Site OU2*, NYSDEC and EPA, October 2009;
- *Remedial Action Report and Certification, LCP Bridge Street Site (OU1)*, Parsons, November 2009;
- *Record of Decision, LCP Bridge Street OU2*, NYSDEC March 2010; and
- *Frequently Asked Questions (FAQs) Onondaga Lake Dredging Project, Sediment Consolidation Area (SCA) at Wastebed 13*, NYSDEC, New York State Department of Health, EPA, April 2010.
- *Geddes Brook/Ninemile Creek Addendum to the Outfall 019 Drainage Ditch Pre-Design Investigation Data Summary Report*, Parsons, May 2010.

PUBLIC COMMENT

EPA is soliciting public comment on its determination to not take Superfund action at the Wastebeds 9 to 15 and LCP Bridge Street OU2 areas of concern. To this end, this document has been made available to the public for a 30-day comment period which concludes on November 30, 2010.

Comments should be sent to:

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 290 Broadway, 20th Floor
 New York, New York 10007-1866

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These documents can be found in the following repositories:

Onondaga County Public Library
 Syracuse Branch at the Galleries
 447 South Salina Street
 Syracuse, NY 13202
 Telephone: 315-435-1900

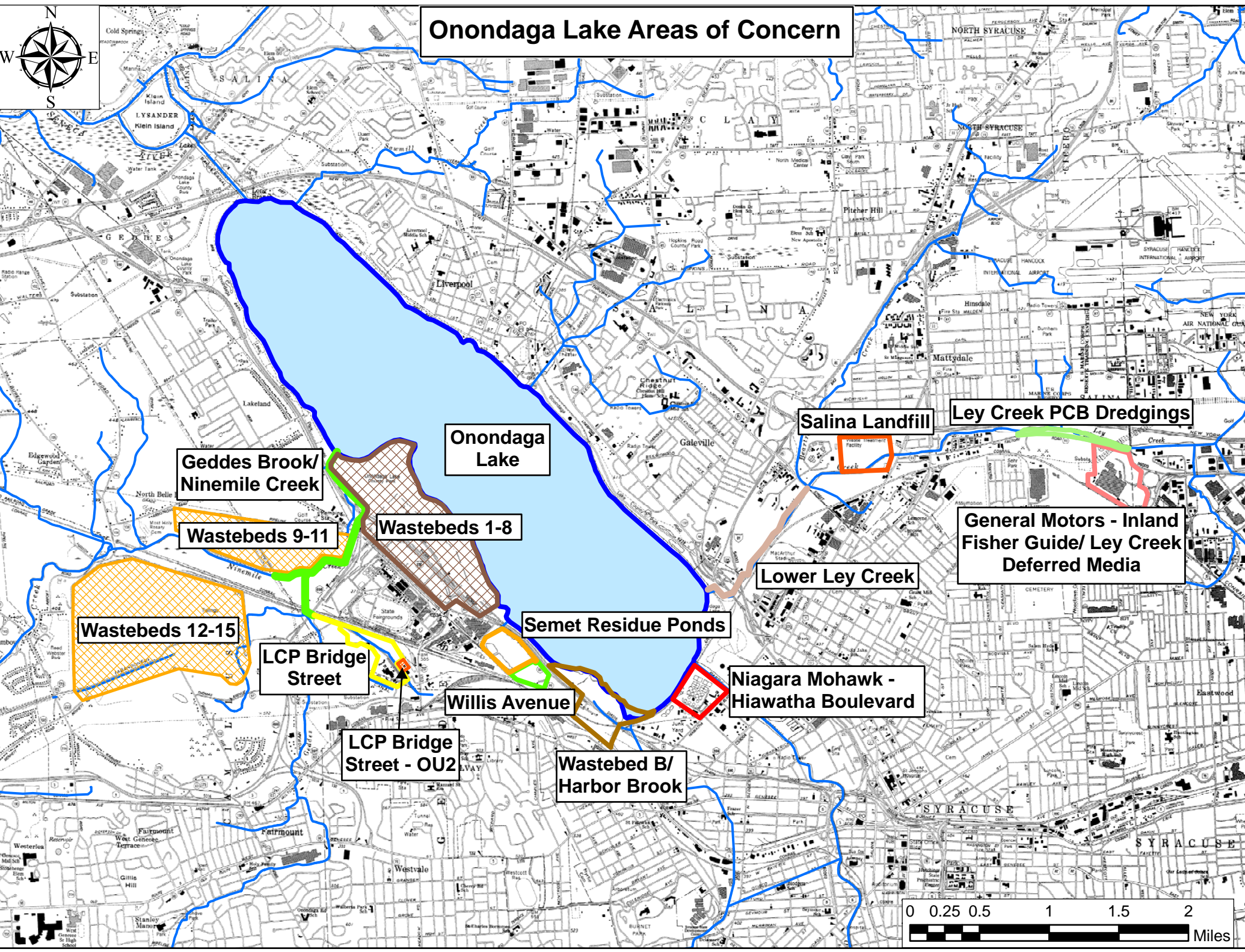
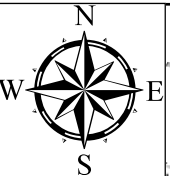
Atlantic States Legal Foundation
 658 West Onondaga Street
 Syracuse, NY 13204
 Telephone: 315-475-1170
 Please call for an appointment.

New York State Department of Environmental
 Conservation, Syracuse Office
 615 Erie Boulevard West
 Syracuse, NY 13204
 Telephone: 315-426-7400
 Please call for an appointment.

Solvay Public Library
 615 Woods Road
 Solvay, NY 13209
 Telephone: 315-468-2441

New York State Department of Environmental
 Conservation, Central Office
 625 Broadway
 Albany, NY 12233
 Telephone: 518-402-9676

Onondaga Lake Areas of Concern



Geddes Brook/
Ninemile Creek

Wastebeds 9-11

Wastebeds 12-15

LCP Bridge
Street

LCP Bridge
Street - OU2

Wastebeds 1-8

Willis Avenue

Wastebed B/
Harbor Brook

Semet Residue Ponds

Lower Ley Creek

Salina Landfill

Ley Creek PCB Dredgings

General Motors - Inland
Fisher Guide/ Ley Creek
Deferred Media

Niagara Mohawk -
Hiawatha Boulevard

Onondaga
Lake

