

STATE OF NEW YORK
DEPARTMENT OF HEALTH



Attachment O

OFFICE OF PUBLIC HEALTH

SYRACUSE REGIONAL OFFICE

677 SOUTH SALINA STREET

SYRACUSE, N.Y. 13202-3592

DAVID AXELROD, M.D.
Commissioner

LINDA A. RANDOLPH M.D., M.P.H.
Director, OPH

WILLIAM F. LEAVY
Executive Deputy Director

December 8, 1989

Ms. Susan McCormick
NYS Department of Environmental Conservation
Bureau of Eastern Remedial Action
50 Wolf Road
Albany, N.Y. 12233

RE: Emerson Power Transmission
Site ID#755010
City of Ithaca, Tompkins County

Dear Sue:

I have reviewed Radian's correspondence regarding vadose and indoor air investigations as a component of the RI/FS to be completed at the above site. They have amended aspects of their proposal and these changes should help to develop a comprehensive approach to evaluating potential exposures via the vadose route. The issue of health based criteria for determining the need for indoor air sampling remains an issue however. We have detailed our position regarding the development and use of such criteria in writing and at the July meeting with company representatives. Our position regarding the use of background and ambient air concentrations as a basis for evaluating vadose air and/or indoor air impacts remains unchanged.

The purpose of the investigation ought to be to determine whether elevated levels of site related contaminants exist within the vadose and if so whether elevated levels of the same contaminants may exist in nearby homes. Given the variables associated with such gas transport, the approach should really entail a monitoring effort. The heterogeneous nature of the shallow soil/ bedrock association introduces a further variable. The original proposal contained a variety of criteria which would have terminated efforts with one or two samplings. The use of health based criteria especially over the short term sampling proposed is especially problematic.

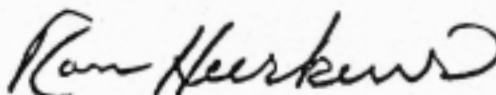
[We are concerned that, due to the local geology, remediation may not be easy or be accomplished quickly. If this is the case, a monitoring program will be especially important. If contaminants are absent from vadose gases that is one thing. If contaminants are present, then ranges of concentrations must be established and this would include seasonal variations within the home setting. If elevated levels can exist within a given home, it may be that simple remedial efforts may eliminate such an exposure altogether.

There are understandable difficulties associated with setting standards for residential indoor air quality. While the potential effects of a given concentration of indoor air contaminants may be discussed as a part of the risk assessment, the acceptance of health based criteria may amount to standard setting. The homeowner in this situation has the right to expect that the air within their home will not be affected by contaminants from a neighboring hazardous waste site and we do not wish to interfere with that right.]

I will review the draft RI/FS prepared by Radian as soon as possible; and, based on the data, we will determine a course of action relative to air quality in homes near the site and will begin to design a sampling program of our own shortly. Unless EPT takes a broader approach to the indoor air question however, we will be forced to consider the RI/FS and the risk assessment therein incomplete.

I will provide comments on the other aspects of the RI/FS document shortly.

Sincerely,



Ronald H. Heerkens
Program Research Specialist
Regional Toxics Coordinator

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cc: Mr. Andersson
Mr. Branagh
Mr. Slack
Mr. Bifera
Dr. Kim
Dr. Hawley
Mr. Tramontano
Mr. Litwin