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New York State Department of Environmental Conservation
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Region 7 Environmental Quality Office
(315) 426-7551
December 19, 1989



Thomas C. Jorling
Commissioner

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JAN 2 1990

Ms. Barbara M. Wong
Project Director
Radian Corporation
13595 Dulles Technology Drive
Herndon, VA 22071

Tompkins County Health Dept.

RE: EMERSON POWER TRANSMISSION (EPT) - SITE I.D.#755010

Dear Ms. Wong:

The New York State Department of Environmental Conservation (NYSDEC) and the New York State Department of Health (NYSDOH) have received and reviewed the following document:

1. The Draft Report, Remedial Investigation Stages 1 & 2 Emerson Power Transmission (EPT), Ithaca, New York Dated November 1989

Enclosed are our general and specific comments on this Draft Report.

Pages 1-6, 1-9, and 5-6 all are concerning current plant operations and routing of storm and floor drains at the plant.

On September 9, 1989 while on site, this observer witnessed the plant maintenance crew degreasing an electric motor over a storm drain near the fire reservoir.

On December 7, 1989, this observer noticed an oil sheen on the water in the northern most sluiceway at the plant. This is allegedly storm water runoff. When brought to the attention of Roger Sherman, the plant engineer, it was said that this is a normal condition, and is not in violation of SPDES.

The nature and source of this sheen needs to be defined to determine if it is a source for the groundwater plume or if its source is, through leaky lines and infiltration of groundwater, the same as the source of the plume.

Page 4-13

The main concern is for the source of the chromium in MW-3 shallow, MW13-25 and MW15-40. The small quantity found in MW4, the upgradient well, indicates that this is found only downgradient of the plant. If it was being liberated naturally from the native bedrock it is expected that the concentrations

would be similar in all groundwater in the area. If a change in groundwater chemistry is responsible for the release of chromium from the bedrock then the downgradient bedrock sample should be depleted of chromium. Since it is not, it is assumed this contaminant's source is the plant.

Page 5-3, Item #2.

The elevated levels of TCE, total Ethene and VOC's found in MW13-25 have not been fully addressed. This well is south of the fire reservoir, and cross gradient from it. This indicates either an additional source not mentioned in the Draft Report or a transport mechanism from the existing source that is not explored in the Draft Report. This area needs additional work.

Page 5-4, Item #4

The MW-6 cluster may be affected by the same source or mechanism as that affecting MW13-25.

Figure C-1

This item shows a well numbered 13-40. Is this really well #13-25 or is there an additional well at this location?

Page 5-8, Item #3

The Departments concur with Radian's PCB findings and further agree that unless new information is uncovered, this is not an area for concern.

Page 5-5, Item #9

Locations for these wells were "eyeballed" to correspond with local joint sets found in outcroppings on the hillside. They may or may not have been located to correspond with known joint sets. Also, data on whether or not the particular joint these wells may intersect is an actual conduit for the contaminants is lacking. These wells give us some information but by no means define the extent of the plume.

Page 5-5, Item #10

Although the fire reservoir source has been mitigated it has not been demonstrated that no free product leaked from this source and formed a secondary source for groundwater contamination. The high levels of TCE in some areas indicate the possibility of a secondary source.

Table 4-5

In Fire Reservoir 1, the sample taken on September 12, 1989 shows 27 ppb aroclor. If this is confirmed, where did it come from and what action should be taken?

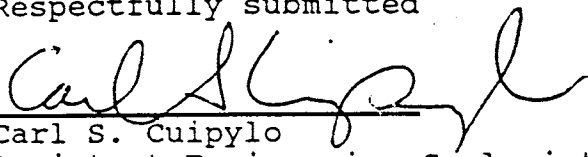
In general the source for hot spots (specifically MW 13-25) has not been defined. This may be done through additional soil/gas survey work, past plant practices work, or location of any former systems that may have leaked TCE into the groundwater.

Additionally, it should be known that although present use of this aquifer is not an issue, and it is a poor yielding aquifer, all water TOGS will apply. This is done for consistent protection of New York State's water resources.

Another issue is the discharge area of this groundwater flow regime. Due to the nature of the erratic flow through bedrock joint sets and bedding planes, the Department cannot be certain that negative results in MW17-40 or MW10-40 indicate the plume has not reached the valley floor. The farthest downgradient reach of the plume needs to be defined.

Although the Draft Report has some weak areas that need to be addressed in the Final Report, it also has information that can be useful in formulating remedial strategies. It is the Department's recommendations that an Interim Feasibility Study on remedial measures for mitigating problems known at this time be proposed on the theory that the longer this situation is allowed to exist the greater the threat posed to public health and safety and the greater the cost of effectively mitigating this contamination problem.

Respectfully submitted


Carl S. Cuipylo
Assistant Engineering Geologist

CSC/lc

CC: E. Belmore
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