



STATE OF NEW YORK DEPARTMENT OF HEALTH

Flanigan Square, 547 River Street, Troy, New York 12180-2216

Antonia C. Novello, M.D., M.P.H., Dr.P.H.
Commissioner

Dennis P. Whalen
Executive Deputy Commissioner

August 2, 2004

Re: Emerson Power Transmission

Dear concerned citizen:

Thank you for your May 25, 2004 letter to Commissioner Novello regarding environmental and health issues related to the Emerson Power Transmission (EPT) site. Many issues were raised in your letter. I will respond to the issues and activities in which the Department of Health has been most involved. The NYS Department of Environmental Conservation (NYSDEC) will separately address the issues and activities in which they have been involved.

First, I would like to offer some background information. Investigations in the late 1980's and early 1990's demonstrated that on-site groundwater was contaminated with volatile organic compounds. A below ground reservoir, used to store water for fire fighting, appeared to be the source of this contamination. Contaminant levels decreased significantly as the plume flowed away from the source. Shallow groundwater flows north-northeast. Monitoring data indicate that contaminant concentrations on-site have decreased significantly (about 40 times less) since groundwater treatment began in 1991.

In 1991 the NYSDOH collected air samples in 10 neighborhood homes to determine the potential for soil vapor intrusion. The phrase "soil vapor intrusion" refers to the process by which volatile chemicals move from a subsurface source into the indoor air of overlying buildings. Soil vapor, or soil gas, is the air found in the pore spaces between soil particles. Because of a difference in pressure, soil vapor enters buildings through cracks in slabs or basement floors and walls, and through openings around sump pumps or where pipes and electrical wires go through the foundation. Heating, ventilation or air-conditioning systems may create a negative pressure that can draw soil vapor into the building. The intrusion is similar to how radon gas seeps into buildings.

Soil vapor can become contaminated when chemicals evaporate from subsurface sources and enter the soil vapor. Chemicals that readily evaporate are called "volatile chemicals." Volatile chemicals may include contaminated soil and groundwater, or buried wastes. If soil vapor is contaminated, and enters a building as described above, indoor air quality may be affected.

The homes sampled in 1991 were located on South Cayuga Street, South Hill Terrace, and West Spencer Street and are the closest occupied dwellings downgradient of the site with regard

to groundwater flow. Four homes in other areas of Ithaca were also tested as a control group to provide comparison information. Air samples were collected in the basement and on the first floor. Household products were inventoried at each tested home, because common household items contain volatile organic ingredients that may impact indoor air quality.

From our evaluation of the data, we concluded that four homes from the test group were not impacted by site-related contaminants and the air in three homes appeared to be impacted by the storage or use of household products. Chemicals potentially related to the site were detected in three homes, indicating that soil vapor intrusion may have been contributing to contaminants in indoor air. Based on the homes' proximity to the site, relative levels found in the basement in comparison to the first floor, and the specific chemicals found, we concluded that the contaminated soil gas was impacting the homes. We also concluded that the levels detected would have presented a slightly increased exposure when compared to control houses, but health effects were not expected at the levels found. We provided the residents with their results and our interpretation of them.

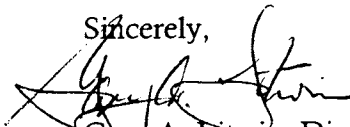
As part of the 1994 Record of Decision (ROD), EPT was required to drill a series of vapor test wells to collect additional information on the presence of soil vapors. These wells were completed in 1995. However, they were never successfully sampled because they promptly filled with groundwater. The presence of water in a vapor well inhibits the ability to sample soil gases. These wells were abandoned in 2002.

Earlier this year, EPT submitted a work plan for the installation of new soil vapor monitoring wells to fulfill their commitment in the 1994 ROD. Nine new vapor wells have been installed on South Cayuga and South Geneva Street in the area downgradient of the EPT facility. The wells have been sampled and the results indicate the need for additional soil gas monitoring and indoor air sampling of nearby residences. If the indoor air sampling identifies adverse impacts to indoor air, installation of mitigation systems will be considered.

We do not plan to conduct any health studies specific to this site. The data collected to date do not indicate that people in the area are being exposed to chemicals from the site at levels that would be a health concern. In the absence of significant exposure, adverse health effects are not anticipated. The need for further action, including health studies, is always assessed when we evaluate new data.

We will inform the public of the results of the investigation and/or any necessary actions by fact sheet or a public meeting, as appropriate. If you have any questions or need any additional information, you may contact Henriette Hamel, in our Central NY Regional Office in Syracuse at 315-477-8154.

Sincerely,



Gary A. Litwin, Director

Bureau of Environmental Exposure Investigation

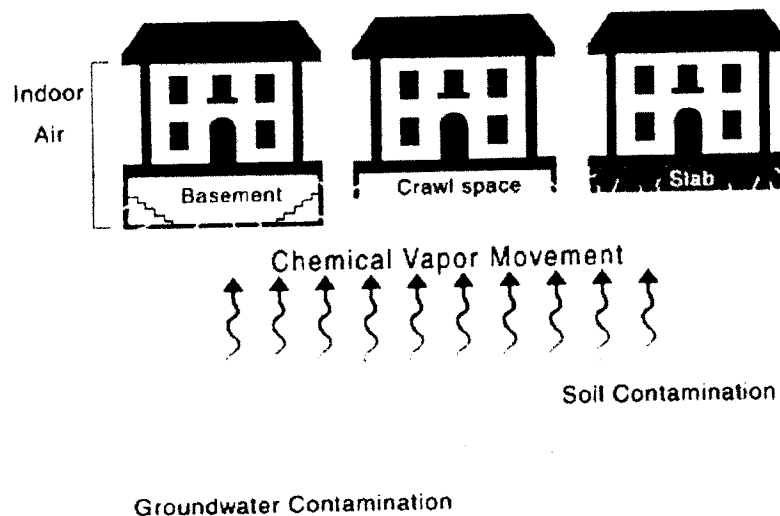
What is soil vapor intrusion?

The phrase "soil vapor intrusion" refers to the process by which volatile chemicals move from a subsurface source into the indoor air of overlying buildings.

Soil vapor, or soil gas, is the air found in the pore spaces between soil particles. Because of a difference in pressure, soil vapor enters buildings through cracks in slabs or basement floors and walls, and through openings around sump pumps or where pipes and electrical wires go through the foundation. Heating, ventilation or air-conditioning systems may create a negative pressure that can draw soil vapor into the building. This intrusion is similar to how radon gas seeps into buildings.

Soil vapor can become contaminated when chemicals evaporate from subsurface sources and enter the soil vapor. Chemicals that readily evaporate are called "volatile chemicals." Volatile chemicals include volatile organic compounds (VOCs). Subsurface sources of volatile chemicals may include contaminated soil and groundwater, or buried wastes. If soil vapor is contaminated, and enters a building as described above, indoor air quality may be affected.

When contaminated vapors are present in the zone directly next to or under the foundation of the building, vapor intrusion is possible. Soil vapor can enter a building whether it is old or new, or whether it has a basement, a crawl space, or is on a slab (as illustrated in the figure).



[Source: United States Environmental Protection Agency, Region 3]

How am I exposed to chemicals through soil vapor intrusion?

Humans can be exposed to soil vapor contaminated with volatile chemicals when vapors from beneath a building are drawn through cracks and openings in the foundation and mix with the indoor air. Inhalation is the route of exposure, or the manner in which the volatile chemicals actually enter the body, once in the indoor air.

Current exposures are when vapor intrusion is documented in an occupied building. *Potential* exposures are when volatile chemicals are present, or are accumulating, in the vapor phase beneath a building, but have not affected indoor air quality. Potential exposures also exist when there is a chance that contaminated soil vapors may move to existing buildings not currently affected or when there is a chance that new buildings can be built over existing subsurface vapor contamination. Both current and potential exposures are considered when evaluating soil vapor intrusion at a site that has documented subsurface sources of volatile chemicals.

In general, exposure to a volatile chemical does not necessarily mean that health effects will occur. Whether or not a person experiences health effects depends on several factors, including inhalation exposure, the length of exposure (short-term or acute versus long-term or chronic), the frequency of exposure, the toxicity of the volatile chemical, and the individual's sensitivity to the chemical.

What types of chemicals associated with environmental contamination may be entering my home via soil vapor intrusion?

Volatile organic compounds, or VOCs, are the most likely group of chemicals found in soil vapor, and which can move through the soil and enter buildings. Solvents used for dry cleaning, degreasing and other industrial purposes (e.g., tetrachloroethene, trichloroethene, 1,1,1-trichloroethane and Freon 113) are examples of VOCs. Examples of petroleum-related VOCs from petroleum spills are benzene, toluene, ethyl benzene, xylenes, styrene, hexane and trimethylbenzenes.

Is contaminated soil vapor the only source of volatile chemicals in my indoor air?

No. Volatile chemicals are also found in many household products. Paints, paint strippers and thinners, mineral spirits, glues, solvents, cigarette smoke, aerosol sprays, mothballs, air fresheners, new carpeting or furniture, hobby supplies, lubricants, stored fuels, refrigerants and recently dry-cleaned clothing all contain VOCs. Household products are often more of a source of VOCs in indoor air in homes than contaminated soil vapor.

Indoor air may also become affected when outdoor air containing volatile chemicals enters your home. Volatile chemicals are present in outdoor air due to their widespread use. Gasoline stations, dry cleaners, and other commercial/industrial facilities are important sources of VOCs to outdoor air.

What should I expect if soil vapor intrusion is a concern near my home?

If you live near a site that has documented soil, groundwater and/or soil vapor contaminated with volatile chemicals, you should expect that the potential for vapor intrusion is being, or has been, investigated. You may be contacted by the site owner or others working on the cleanup with information about the project. Your cooperation and consent would be requested before any testing/sampling would be done on your property. You may ask the person contacting you any questions about the work being done. You can also contact the NYSDOH's project manager for the site at 1-800-458-1158 (extension 2-7850) for additional information.

How is soil vapor intrusion investigated at sites contaminated with volatile chemicals?

The process of investigating soil vapor intrusion typically requires more than one set of samples to determine the extent of vapor contamination. Furthermore, four types of environmental samples are collected: soil vapor samples, sub-slab vapor samples, indoor air samples and outdoor air (sometimes referred to as "ambient air") samples.

Soil vapor samples are collected to characterize the nature and extent of vapor contamination in the soil in a given area. They are often collected before sub-slab vapor and/or indoor air samples to help identify buildings or groups of buildings that need to be sampled. Soil vapor samples are used to determine the *potential* for human exposures. *Soil vapor* samples are not the same as *soil* samples.

Sub-slab vapor samples are collected to characterize the nature and extent of vapor contamination in the soil immediately beneath a building with basement foundations or a slab. Sub-slab vapor results are used to determine the potential for *current* and *future* human exposures. For example, an exposure could occur in the future if cracks develop in the building's foundation or changes in the operation of the building's heating, ventilation or air-conditioning system are made that make the movement of contaminated soil vapor into the building possible.

Indoor air samples are collected to characterize the nature and extent of air contamination within a building. Indoor air sample results help to evaluate whether there are *current* human exposures. They are also compared to sub-slab vapor and outdoor air results to help determine where volatile chemicals may be coming from (indoor sources, outdoor sources, and/or beneath the building).

Outdoor air samples are collected to characterize site-specific background air conditions. Outdoor air results are used to evaluate the extent to which outdoor sources, such as automobiles, lawn mowers, oil storage tanks, gasoline stations, commercial/industrial facilities, and so forth, may be affecting indoor air quality.

What should I expect if indoor air samples are collected in my home?

You should expect the following:

- Indoor air samples are generally collected from the lowest-level space in a building, typically a basement, during the heating season. Indoor air samples may also be collected from the first floor of living space. Indoor air is believed to represent the greatest exposure potential with respect to soil vapor intrusion.
- Sub-slab vapor and outdoor air samples are usually collected at the same time as indoor air samples to help determine where volatile chemicals may be coming from (indoor sources, outdoor sources, and/or beneath the building).
- More limited sampling may be performed outside of the heating season. For example, sub-slab vapor samples without indoor air or outdoor air samples may be collected to identify buildings and areas where comprehensive sampling is needed during the heating season.
- An indoor air quality questionnaire and building inventory will be completed. The questionnaire includes a summary of the building's construction characteristics; the building's heating, ventilation and air-conditioning system operations; and potential indoor and outdoor sources of volatile chemicals. The building inventory describes products present in the building that might contain volatile chemicals. In addition, we take monitoring readings from a real-time organic vapor meter (also known as a photoionization detector or PID). The PID is an instrument that detects many VOCs in the air. When indoor air samples are collected, the PID is used to help determine whether

products containing VOCs might be contributing to levels that are detected in the indoor air.

What happens if soil vapor contamination or soil vapor intrusion is identified during investigation of a site?

Depending on the investigation results, additional sampling, monitoring or mitigation actions may be recommended. Additional sampling may be performed to determine the extent of soil vapor contamination and to verify questionable results. Monitoring (sampling on a recurring basis) is typically conducted if there is a significant potential for vapor intrusion to occur should building conditions change. Mitigation steps are taken to minimize exposures associated with soil vapor intrusion. Mitigation may include sealing cracks in the building's foundation, adjusting the building's heating, ventilation and air-conditioning system to maintain a positive pressure to prevent infiltration of subsurface vapors, or installing a sub-slab depressurization system beneath the building.

What is a sub-slab depressurization system?

A sub-slab depressurization system, much like a radon mitigation system, essentially prevents vapors beneath a slab from entering a building. A low amount of suction is applied below the foundation of the building and the vapors are vented to the outside (see illustration). The system uses minimal electricity and should not noticeably affect heating and cooling efficiency. This mitigation system also essentially prevents radon from entering a building, an added health benefit. The party responsible for cleaning up the source of the soil vapor contamination is usually responsible for paying for the installation of this system. If no responsible party is available, New York State will install the system. Once the contamination is cleaned up, the system should no longer be needed. In areas where radon is a problem, the NYSDOH recommends that these systems remain in place permanently.

What else can I do to improve my indoor air quality?

Household products and other factors, such as mold growth, carbon monoxide, and radon, can degrade the quality of air in your home. Consider the following tips to improve indoor air quality:

- Be aware of household products that contain VOCs. Do not buy more chemicals than you need at a time.
- Store unused chemicals in tightly-sealed containers in a well-ventilated location, preferably away from the living space in your home.
- Keep your home properly ventilated. Keeping it too air-tight may promote build up of chemicals in the air, as well as mold growth due to the build up of moisture.
- Fix all leaks promptly, as well as other moisture problems that encourage mold growth.
- Make sure your heating system, hot water, dryer and fireplaces are properly vented and in good condition. Have your furnace or boiler checked annually by a professional.
- Test your home for radon; take actions to reduce radon levels if needed.
- Install carbon monoxide detectors in your home; take immediate actions to reduce carbon monoxide levels if needed.

Where can I get more information?

For additional information about soil vapor intrusion, contact the NYSDOH's Bureau of Environmental Exposure Investigation at 1-800-458-1158 (extension 2-7850).