

New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 7
615 Erie Boulevard West, Syracuse, New York 13204-2400
Phone: (315) 426-7551 • FAX: (315) 426-7499
Website: www.dec.state.ny.us



November 9, 2004

Mr. Scott Haitz
Environmental Strategies Corporation
11911 Freedom Drive
Reston, Virginia 20190

Re: Emerson Power Transmission, Ithaca, NY
Site # 7-55-010 Morse Industrial, aka Emerson Power Transmission
July 28, 2004 Supplemental Off Site Investigation Work Plan

Dear Mr. Haitz:

The New York State Department of Environmental Conservation and the New York State Department of Health have reviewed the above referenced Work Plan. What follows are comments on that work plan that must be addressed and resolved before the approval of the Work Plan.

- 1) Additional monitoring well designations shall be similar and consecutive to the designations from the previous Remedial Investigation so that easy comparisons can be made. It appears that the previous wells numbered up to MW 17-40. Additional monitoring wells should be numbered sequentially from there.
- 2) Monitoring wells MW-5-40, MW-7-40, MW-8-40, MW-9-40, MW-10-40 and MW-17-40 shall be inspected for damage or disfunction through neglect, repaired and returned to service as part of the off site monitoring network.
- 3) Two additional monitoring wells shall be added to the currently proposed groundwater investigation. They will be located near the proposed MW-8B and MW-7B and will be finished into the unconsolidated overburden. They will be installed with hollow stem augers or driven or spun casing, will include a sand filter pack and well screen sized appropriately for the soils encountered and shall be finished, developed and sampled as the proposed bedrock wells. The well screen will be fifteen feet in length and will intersect the water table.
- 4) All newly installed and usable existing off site wells will be initially sampled concurrently for VOCs, SVOCs and PCBs. Groundwater elevation data will be collected from these wells. Data from this initial sampling event will be used to determine future sampling parameters from each individual well. All wells will be routinely sampled on a quarterly basis and future sampling frequency will be determined one year from the initial sampling event.

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- 5) In addition to the proposed surface water sample, grab samples will be taken from a groundwater seep below the EPT's northern parking lot (behind 123 South Hill Terrace), a reported artesian well behind 212 Wood Street, a surface seep in the front yard of 514 South Cayuga Street, and a cistern like structure under the south railroad bridge abutment at the upper end of South Cayuga Street. To the extent possible the artesian well and the cistern like structure shall be investigated and construction shall be documented. All sampling points shall be mapped on the site map.
- 6) An internal TV inspection shall be performed on the South Cayuga storm and sanitary sewers for the purpose of determining infiltration of groundwater or leakage of storm or sanitary sewage.
- 7) Page 1, Introduction, the sentence "The proposed scope of work is designed to gather additional data for use in evaluating the results of vadose zone soil gas sampling that was conducted in the same area in June of 2004" should read to include that the purpose is also to evaluate the nature and extent of groundwater and surface water contaminant migration from the EPT facility.
- 8) The first sentence of the second paragraph of the Introduction section should not read to limit the investigation to the upper bedrock zone. It should also include the surface water, groundwater in the overburden, and water from the artesian well on Wood Street. A sentence to the effect that these other areas will be investigated should be added.
- 9) Section 2.1, last sentence, Cayuga Lake is located northwest of the site.
- 10) Section 3.0, the first sentence should be reworded to include that the results of this investigation will be used to define the nature and extent of contamination from this site. The bulleted items must be edited to reflect the changes to the proposed work plan.
- 11) Appendix A includes several SOPs that are not relevant to this work plan. This appendix should be edited to include only applicable SOPs.
- 12) The area residents should be notified that Emerson will be performing investigative activities in the area. Indicate to the Department the method by which the public will be notified of the commencement of the field work.

Please send a revised work plan incorporating the above comments within ten days of receipt of this letter along with a schedule for the completion of the field work and report preparation.

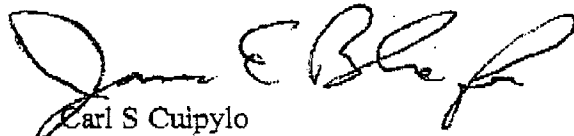
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The Department appreciates and understands the need for the above referenced work. It is also required that, due to the persistent elevated concentrations of contaminants remaining in the on site groundwater and those found in the off site vadose zone and nearby residences, Emerson will submit to the New York State Department of Environmental Conservation and the New York State Department of Health, by December 15, 2004, an investigative work plan to aggressively and completely define the nature and extent of contamination both on and off site.

Additionally, I cannot find the results of the monitoring well installation from the August 28, 2003 work plan. Please submit a copy including well logs and construction diagrams and any analytical work from these wells done to date.

You may call me with questions at (315) 426-7525.

Sincerely,



Carl S CuiPYlo
Engineering Geologist

CSC/cr

cc: Henri Hamel
Geoff Laccetti
Mary Jane Peachey
Stephan Maybee
James Burke