

November 12 2004

Mr. Carl S. Cuipyllo  
Engineering Geologist  
New York State Department of Environmental Conservation  
Region 7  
615 Erie Boulevard, West  
Syracuse, NY 13204-2400

Re: Response to Comments  
Emerson Power Transmission Facility, Ithaca, New York

Dear Carl:

Emerson has reviewed the New York State Department of Environmental Conservation's (NYSDEC's) comments on the *Supplemental Investigation Work Plan* for the Emerson Power Transmission Facility, dated July 28, 2004. Overall, we agree to implement the suggested changes with the exception of sampling the artesian well on Wood Street, and developing an additional investigation work plan for submittal to NSYDEC by December 15, 2004. Listed below are the responses to comments from your letter, dated November 9, 2004.

**NYSDEC Comment 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.

**Response 1:**

Well designations will be consistent with the previous Remedial Investigation. The text and figures will be modified to address this comment.

**NYSDEC Comment 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.

**Response 2:**

The integrity of offsite monitoring wells MW-5-40, MW-7-40, MW-9-40, ~~MW-10-40~~ and MW-17-40 will be evaluated by visual inspection. Based on this evaluation, repairs will be made, as necessary, and each usable well will be re-developed prior to sampling. Offsite wells MW-7-40, MW-9-40, and MW-17-40 will be sampled, as requested. Section 4.0 will be modified to incorporate this change.

It should be noted that monitoring well MW-10-40 was likely destroyed during the Spencer Street expansion. Emerson will attempt to locate and evaluate this well in the field, if possible.

In addition, Emerson does not plan to sample monitoring well MW-8-40 due to its similar construction and close proximity to existing monitoring well MW-9-40.

**NYSDEC Comment 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.

**Response 3:**

Monitoring wells MW-7B and MW-8B are proposed for an area that is underlain by a sand and gravel aquifer. The aquifer in this area is confined and is overlain by a clay and silt aquitard. As suggested by NSYDEC, these wells will be installed using hollow stem auger and will be completed within the unconsolidated overburden material using a screened section that is 15 feet in length. Because Emerson has agreed to modify the construction of these wells, two additional monitoring wells are not necessary. Section 4.0 of the work plan will be modified to incorporate this change.

In addition, monitoring wells MW-7B and MW-8B will be re-named (MW-18A and MW-19A) in accordance with NSYDEC comment 2.

**NYSDEC Comment 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.

**Response 4:**

All newly installed wells and usable offsite wells will be sampled concurrently for VOCs,

SVOCs and PCBs, as requested. Emerson proposes to sample the new and usable offsite wells two weeks following new well installation. A second round of samples will be collected three months following new well installation. Once Emerson and NSYDEC have reviewed the groundwater sampling results, decisions can be made for the installation of additional monitoring wells or the identification of selected wells for continued monitoring. Section 4.3.2 of the work plan will be modified to incorporate the additional parameter (SVOCs) and samples.

**NYSDEC Comment 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.

**Response 5:**

Emerson will sample the groundwater seep below EPT's northern parking lot, a surface seep at 514 South Cayuga Street, and the cistern under the south railroad bridge abutment at the upper end of South Cayuga Street. Section 4.0 of the work plan will be modified to include the additional sampling.

At this time, Emerson believes that sampling the reported artesian well behind 212 Wood Street is not warranted. The construction and depth of this well is unknown and it is beyond the study area. The results of groundwater samples collected from proposed monitoring wells MW-18A and MW-19A (Wood Street/South Geneva Street Wells) will be used to determine the need to further assess areas to the west, including possibly sampling the artesian well.

**NYSDEC Comment 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.

**Response 6:**

Emerson believes that the results of the Indoor Air Assessment and Supplemental Groundwater Investigation should be evaluated before determining the appropriate method for evaluating the storm and sanitary sewer lines located on South Cayuga Street. If the sampling results indicate that the Cayuga Street sewer lines may be acting as migration pathways for site related compounds, Emerson will develop a scope of work to evaluate the lines as potential migration pathways.

**NYSDEC Comment 7:**

Page 1, Introduction, paragraph , 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.

**Response 7:**

Page 1 of the Introduction will be modified to incorporate this comment.

**NYSDEC Comment 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.

**Response 8:**

The first sentence of the second paragraph will be modified to address this comment, with the exception of sampling the Wood Street well at this time (see response to NYSDEC Comment 5)

**NYSDEC Comment 9:**

Section 2.1, last sentence, Cayuga Lake is located northwest of the site.

**Response 9:**

The last sentence of Section 2.1 will be modified.

**NYSDEC Comment 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.

**Response 10:**

The first sentence of Section 3.0 will be modified to address this comment.

**NYSDEC Comment 11:**

Appendix A includes several SOPs that are not relevant to this workplan. This appendix should be edited to include only applicable SOPs.

**Response 11:**

Appendix A will be modified to include only relevant SOPs.

**NYSDEC Comment 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 fieldwork.

**Response 12:**

The area residents will be notified by letter prior to commencing fieldwork. A schedule for completing the work will also be provided.

**NYSDEC General Comment:**

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.

**Response:**

Emerson proposes to review the results of the Indoor Air Assessment and the Supplemental Groundwater Investigation before preparing and submitting an additional investigation work plan to NSYDEC. The results of these investigations are critical in identifying the data gaps. Once the data gaps have been identified and are better understood, a comprehensive investigation work plan can be prepared to evaluate the nature and extent of affected groundwater.

Following your approval of this letter, Emerson would like to proceed with the implementation of the Supplement Groundwater Investigation Work Plan. Emerson understands that some issues may require additional discussion and clarification. However, Emerson is requesting approval to proceed and schedule fieldwork. Emerson is concerned that because of potential inclement weather, any further delay could push the planned work to Spring of 2005.

In addition, a figure showing the revised monitoring well locations is provided. The figure includes designations consistent with the previous Remedial Investigation and includes adjusted well locations.

Please feel free to call me to discuss these responses.

Sincerely,

Derek E. Chase  
Director Environmental Affairs

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