

New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 7
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Denise M. Sheehan
Acting
Commissioner

April 5, 2005

Mr. Scott Haitz
Senior Project Engineer
Environmental Strategies Consulting, LLC
11911 Freedom Drive, Suite 900
Reston, Virginia 20190

Re: Preliminary Onsite Remedial Investigation Work Plan (02/05)
Emerson Power Transmission Facility
(C) Ithaca, Tompkins County

Dear Mr. Haitz:

The New York State Departments of Environmental Conservation and Health have reviewed the referenced document. The preliminary work plan as proposed is an environmental assessment of the site, utilizing historical literature information. In addition a site inspection of the Emerson Facility and a survey of area utility conduits is also proposed. While the State agrees that this is a necessary and valuable assessment, the preliminary work plan does not include any initial physical site investigation activities. While it is recognized that the proposed environmental assessment will provide information on areas of concern for future investigation, the State believes that some initial onsite investigation should occur concurrently with the environmental assessment. Previous studies and reports should be used to provide a basis for identifying areas of concern for this initial investigation. These studies include the February 1990 Remedial Investigation Report; the August 1994 Feasibility Study Report; the November 1994 Oily Soil Remediation Report; the 2004-2005 soil gas/indoor air sampling; the on- and offsite monitoring well data reports; and the recent drum recovery report.

Please revise and resubmit a work plan that includes this initial concurrent site investigation work. This investigation must be conducted per NYSDEC DER-10 "Tech Guide" requirements. In addition, subslab and indoor air testing at the EPT facility are to be included in this work plan.

In addition to the above, the following specific comments are also provided on the preliminary work plan:

1. Figure 2: Please show a map of the entire facility. In addition, Section 2.1 notes that Figure 2 illustrates "30 buildings and structures that encompass approximately 800,000 square feet." Figure 2 does not show this level of detail. Please include and submit a revised figure showing this site information.
2. Page 3: Section 2.2 discusses a Figure 4 in the work plan. Only Figure 1 and 2 are included in the preliminary work plan. Please submit any additional figures.

3. Page 4: A historical pump test at MW3-31 removed 5 gallons of water over a 25 minute period. Is this an accurate statement?
4. Page 5: Discussions in Section 2.4 need to be more specific on depths and locations at which VOC's were present in groundwater on site. References to "the north portion of the site" where TCE and its degradation products are present is not of sufficient detail. Please provide additional information.
5. Page 6: Has the lateral extent of contaminated groundwater in the lower portion of the fractured bedrock been defined, similar to the upper portion?
6. Section 2.4.4: Inclusion of the term "downgradient" in reference to the vadose zone areas sampled implies that the entire "downgradient" area was tested. Testing was limited to the locations noted.
7. Section 2.4.4., last paragraph: Please define "background concentrations". Also, possible site-related VOC's were detected in VP-2 and VP-3 along south Geneva Street.
8. Page 7, last paragraph: Please add Turner Place to list of streets. Also, please include language indicating 3 homeowners have been offered mitigation systems based on the first round of indoor air tests, and that a second phase of testing began in January 2005.
9. Section 2.4.3: The statement that the 2-phase system is "containing" VOC's cannot be confirmed presently due to the lack of a historical offsite monitoring network.
10. Future phases of indoor air sampling will require analysis using a lower detection limit (0.25 mg/m³) for TCE than used in phase 1 and 2 (0.82 mg/m³). This will allow for the appropriate use of NYSDOH TCE vapor intrusion matrices.

Please submit a revised work plan incorporating the above comments within thirty (30) days of receipt of this letter. If there are any questions on this letter, please contact this office at (315) 426-7550.

Sincerely,

James E. Burke, P. E.
Regional Hazardous Waste Remediation Engineer

JEB/cr

c: Mary Jane Peachey (NYSDEC)
Karen Cahill (NYSDEC)
Carl Cuiylo (NYSDEC)
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