

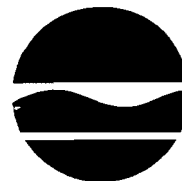
New York State Department of Environmental Conservation

Division of Environmental Remediation, Region 7

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Denise M. Sheehan
Acting
Commissioner

June 21, 2005

Mr. Derek Chase
Emerson Power Transmission
8000 West Florissant
St. Louis, Missouri 63136

Re: Proposal for Follow-up Testing of Indoor Air in Select Homes & Expansion of Indoor Air Study Area - Emerson Power Transmission, Ithaca, NY: May 11, 2005

Revised Proposal for Follow-up Testing of Indoor Air in Select Homes and Expansion of Indoor Air Study Area - Emerson Power Transmission Facility, Ithaca, NY: May 27, 2005

Amended Proposal for Soil Vapor Sampling - Emerson Power Transmission Facility, Ithaca, NY: June 9, 2005

Dear Mr. Chase:

The following are the State's comments after review of the above proposals received from Environmental Strategies (ESC) on behalf of Emerson to further address vapor intrusion issues in Ithaca. Taken together, with some minor stipulations, the proposals for additional work are acceptable to the State.

Through negotiation and counter-proposals, agreement has been reached in regard to the re-sampling of specific homes, an expansion into additional homes, and a vapor point installation/sampling project west of Geneva Street.

Subslab and indoor air will be re-sampled at sixteen specific properties in October. One of these was to be sampled during the second round, but was not because of technical difficulties. Subslab and indoor air sampling will be performed in an expanded area north of Hillview Place, to encompass 16 "new" homes. The sampling of these 16 will be accomplished first in the October group to allow for any necessary follow-up during the heating season. The sampling of the 32 properties will be consistent with procedures and detection limits detailed in the May 27th proposal.

In response to the State's request of Emerson to perform an assessment of vapor intrusion potential in the West Spencer/S. Plain/S. Titus neighborhood, the June 9th proposal suggests eight temporary vapor points on and north of Park Street between S. Albany and S. Plain Streets. Installation and sampling of these vapor points shall be accomplished in July, thus allowing sufficient time for an assessment of the results and organization of any necessary follow-up. Detection limits for these samples should be the same as those obtained for subslab and indoor air: 0.25 ug/cubic meter for TCE and 1 ug/cubic meter for other site-related VOCs.

Questions concerning the State's position are posed in the May 27th and May 11th proposal and are addressed below:

May 27th proposal

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- "Data gaps" referred to at the May 12th meeting, and in subsequent correspondence and discussions, refer to the lack of investigation and information available at this time to assure both the State and residents that vapor intrusion is not a potential issue in the neighborhood bounded by West Spencer Street on the south, South Plain Street on the west, and South Titus Avenue on the north.
- That site-related VOCs are not found off-site in a residential neighborhood "in groundwater at concentrations above the remediation target levels for the EPT site" may not be relevant to off-site vapor intrusion.
- The State's concern is not that soil vapor will migrate in the overburden "across areas where the bedrock outcrops occur along the hillside." Rather, the State is concerned with the possibility that contamination may migrate down through fractures in the bedrock on-site and then seep out of the rock off-site beneath the alluvium and homes. The presence of an artesian well in the vicinity of Wood Street is an indication that those conditions may exist.

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- NYSDOH does not agree that the geophysical survey, as proposed, would provide information on which to base conclusions applicable to the western neighborhood. It is our hope that vapor points actually located in the neighborhood would provide more direct information

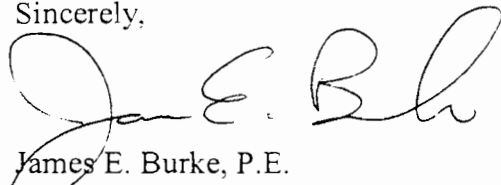
May 11, 2005 Proposal

- "Sub-slab sampling results are not consistent with the groundwater sampling data" is stated by Emerson's consultant in a proposal for work to be done at the R & D Building. That monitoring wells in the western neighborhood showed no detectable levels of site-related VOCs cannot be used as definitive proof that vapor intrusion is not an issue. It is one piece of evidence.

MR. DEREK CHASE
JUNE 21, 2005
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It is hoped that Emerson and ESC better understand the rationale for our requests. If you or they have any questions, please call me at (315) 426-7550.

Sincerely,

A handwritten signature in black ink, appearing to read "James E. Burke". The signature is fluid and cursive, with the first name "James" being the most prominent.

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

JEB/cr

cc: Henriette Hamel, NySDOH
Geoffrey Laccetti, NYSDOH
Mary Jane Peachey, NYSDEC
Carl Cuiylo, NYSDEC
Stephen Maybee, Tompkins County DOH
Tompkins County Library