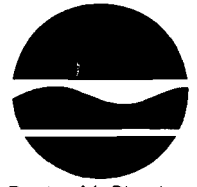


**New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 7**

115 Erie Boulevard West, Syracuse, New York 13204-2400

Phone: (315) 426-7519 • FAX: (315) 426-7499

Website: www.dec.state.ny.us



Denise M. Sheehan
Acting
Commissioner

June 21, 2005

Mr. Derek Chase
Emerson Power Transmission
8000 West Florissant Avenue
P. O. Box 4100
St. Louis, Missouri 63136-8506

Re: R & D Building Focused Indoor Air Assessment and Soil/Groundwater Investigation
May 11, 2005 Submittal

Dear Mr. Chase:

The New York State Departments of Environmental Conservation and Health have reviewed the referenced submittal. The following comments will need to be addressed prior to final approval of the work proposed in the submittal:

1. All building inspections, inventory work as well as subslab, indoor air and ambient air testing is to be conducted in accordance with current NYSDOH April 2005 protocol and methodology.
2. According to data available to this Department, the wells proposed in your May 11th submittal will not sufficiently define or evaluate groundwater quality downgradient from the R & D Building. The locations of the three proposed monitoring wells should be adjusted to more fully cover the potential for off-site migration to the west of the R & D Building and to be as close as practicable to the building. At a minimum, specifically, MW-27B should be located approximately 40 feet south of the proposed location; MW-28B and MW-29B should be located approximately 30 feet west of the proposed location. Additional wells may be needed to define the groundwater near the R & D Building.
3. Due to the presence of dense glacial till containing cobbles, gravel, compacted silt and clay, it is questioned how effective a hand auger will be in collecting soil samples at depths to four feet below ground surface. Should the hand auger not be effective in soil sample collection, split spoon samples shall be used.
4. A project schedule is to be included in the response to these comments. The schedule shall include all work tasks proposed in the referenced submittal with specific timelines and completion dates for conducting field work and report preparation and submittal to the State. In addition, please include a description of the contents of the final report in your response to these comments.

MR. DEREK CHASE

JUNE 21, 2005

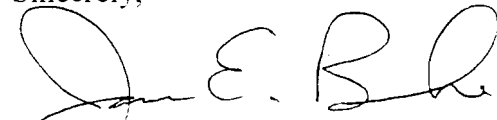
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5. The groundwater levels in these and all other wells are to be taken during all sampling events and on an ongoing periodic basis to establish a database of groundwater flow directions and contours.
6. In addition to parameters proposed, please include TAL metals in the analyze list.
7. Please include results from the analysis of the "seep" located north of the R & D Building in the final report for this work.

It is noted that the proposed work is an initial component of an on and off site remedial investigation of the Emerson facility. A response to the State's comments on the preliminary remedial investigation work plan was received on May 20, 2005 and is currently under review.

Please respond to this letter by July 15, 2005. 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

RJB/cr

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