



ENVIRONMENTAL STRATEGIES CONSULTING LLC

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June 16, 2006

Mr. James E. Burke, P.E.  
Environmental Engineer  
New York State Department of Environmental Conservation  
Region 7  
615 Erie Boulevard West  
Syracuse, NY 13204-2400

Re: Semi-Annual Progress Report – Response to NYSDEC Comments  
Emerson Power Transmission Facility, Ithaca, New York

Dear Mr. Burke:

Emerson has reviewed the May 8, 2006, correspondence from the New York State Department of Environmental Conservation (NYSDEC), which provides comments on the semiannual progress report for July 2005 through January 2006 for the Emerson Power Transmission facility. Listed below are the comments, followed by our responses.

**NYSDEC Comment 1**

*Previous correspondence from the State (12/28/05) recommended that nine (9) new and four (4) existing off-site monitoring wells be added to the list of extraction and monitoring wells sampled and reported routinely on a semi-annual basis. Please provide rationale for not including these wells as part of an ongoing monitoring program. The effectiveness of improvements to the 2-phase extraction system that are anticipated to occur during 2006 can be measured in part through continued monitoring of strategic on and off site wells.*

Response

The 13 wells recommended for further monitoring were sampled in late December 2005 and will be included in the January through June 2006 semiannual progress report that will be submitted to NYSDEC in July 2006. In addition, the 13 wells will continue to be monitored on a semiannual basis and included in the progress reports. The next sampling event is scheduled for July 2006.

**NYSDEC Comment 2**

*Improvements to the treatment system should include modifications that will decrease system "downtime" during winter months.*

Response

The planned treatment system modifications and enhancements will not only decrease the "downtime" in winter months, but will enhance the overall runtime of the system.

**NYSDEC Comment 3**

*Elevated levels of VOCs significantly above State standards persist in many of the on-site wells, including:*

- Extraction Wells 1, 2, and 3*
- Monitoring Wells 2, 3-31, 3-100, 3-150*

*Design modifications to the treatment system should maximize VOC mass removal efforts in areas of highest concentrations at the wells noted above. It is understood that this effort is occurring during 2006 via use of the results from the aquifer pump test.*

Response

System upgrades will be designed to enhance volatile organic compound (VOC) mass removal from areas of highest VOC concentration is the B and C zones. Additional testing will be proposed to clarify the understanding of VOC mass within the deeper zone fractures (i.e., MW-3-100 and MW-3-150).

**NYSDEC Comment 4**

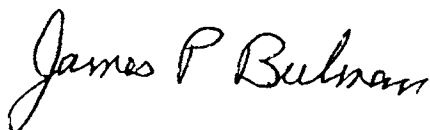
*Please submit an electric copy of the report.*

Response

A CD-Rom copy of the semiannual progress report (progress report 19) for the 2-PHASE™ extraction system was submitted to the Department in May 2006. The file was too large to submit electronically.

Please do not hesitate to contact us if you have any questions.

Sincerely yours,



James P. Bulman  
Executive Partner

JPB:sph:lpf

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cc: Mr. Derek Chase, Emerson  
Henriette Hamel, NYSDOH