

New York State Department of Environmental Conservation

Division of Environmental Remediation, Region 7

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Alexander B. Grannis
Commissioner

July 24, 2007

Mr. Derek E. Chase
Director, Environmental Affairs
Emerson Power Transmission
8000 West Florissant Avenue
PO Box 4100
St. Louis, MO 63136-8506

**Re: Emerson Power Transmission
Ithaca, New York
Site No. 755010**

Dear Mr. Chase:

The NYSDEC and the NYSDOH have reviewed the June 29, 2007 *Supplemental Remedial Investigation Work Plan* prepared by WSP, and find that the concerns expressed in our May 31, 2007 letter have, in general, been satisfactorily addressed. Accordingly, the Work Plan is hereby approved with modifications. The modifications are outlined as follows:

1.0 Introduction

- In addition to our May 31, 2007 letter, the December 13, 2005 Onsite Assessment is also a basis for preparation of the Work Plan.

2.0 Site Background

- A clarification is required within 10 days of this letter stating whether Section 2.2 is missing from the Work Plan, or if the sections are mis-numbered.

3.0 AOC Investigation

- Copies of referenced facility drawings (i.e., #27036 on page 9 and #81590 on page 10) must be furnished within 10 days of receipt of this letter.
- With respect to Section 3.1.3 (AOC 3), in the event there are no elevated PID readings, staining, or other evidence of contamination, then the sample intervals will be selected in consultation with the NYSDEC's on-site representative.

- Section 3.1.5 indicates that PAHs will be included in the analysis of two of the three soil samples obtained from AOC 5; Table 1 indicates all three. Clarification must be provided within 10 days of receipt of this letter.
- The last sentence of Section 3.1.19 references a July 2005 Vadose Zone Work Plan. All other references to this report specify a January 16, 2004 date. Clarification must be provided within 10 days of receipt of this letter.
- With respect to Section 3.1.22 (AOC 23), the text indicates that two borings will be installed inside each building (1, 2, and 10), and one soil sample will be collected from each boring (for a total of six samples). Table 1 must be revised to reflect this and submitted within 10 days of receipt of this letter.
- With respect to Section 3.1.24 (AOC 25), the text indicates that six borings will be completed in AOC 25b, and 2 borings will be completed in AOC 25d. This is consistent with Figures 2B and 2A, respectively. Table 1 must be revised to reflect this and submitted within 10 days of this letter. Further, it is not clear if the boring locations in AOC 25c, as described on page 16, are consistent with those depicted on Figure 2A (i.e., Should two of the borings be located on the east side of the former plating line?). Clarification must be provided within 10 days of receipt of this letter.
- With respect to Section 3.3:
 - “. . . for analysis of VOCs using EP[A] Method 8260.” is hereby removed from the text at the top of page 17, since a complete list of analytical protocols is provided in the subsequent paragraph.
 - The collection and analysis of soil vapor and manhole vapor samples (from AOCs 20 and 21) will be performed in accordance with the protocols specified in the NYSDOH soil vapor intrusion guidance. The samples will be analyzed for VOCs utilizing EPA Method TO-15. The minimum reporting limits will be 0.25 $\mu\text{g}/\text{m}^3$ for TCE and vinyl chloride, and 0.1 $\mu\text{g}/\text{m}^3$ for all other VOCs.

4.0 Fire Water Reservoir Investigation

- The next-to-last sentence in the second paragraph on page 19 is hereby modified to reference “directional” borings.
- As Jim Bulman and I discussed by telephone on June 28, 2007, an additional boring must be located in the vicinity of (former) extraction well EW-4 in order to create a geologic profile from east to west below the reservoir. This boring must be drilled and cored per Section 4.3.1 of the Work Plan, and logged per Section 4.3.1.1. A soil and/or bedrock sample is to be obtained from a depth corresponding to the bottom of the reservoir (or just below) from this boring, as well as EXB-1, -2, and -3 for analysis of VOCs. In addition, the groundwater

is to be sampled and vertically profiled as described in Section 4.3.1.2, and packer testing and borehole abandonment are to be performed in accordance with Section 4.3.1.2. The Work Plan must also specify which well(s) will be pumped and which will be monitored during the packer testing to determine connectivity. This information should be provided within 10 days of receipt of this letter.

- As Mr. Bulman and I also discussed, two water samples are to be collected from the reservoir for analysis of VOCs, one of which is to be collected from within the internal oil skimmer.

5.0 Bedrock Evaluation

- The last paragraph of Section 5.1.2 is hereby revised to reference Figure 6, rather than Figure 5.
- With respect to Section 5.2.2, a minimum of three wells must be installed within the potential groundwater discharge area, as discussed in our May 31, 2007 letter. Further, these are to be permanent installations, not temporary ones as the Work Plan indicates. These wells should be screened to correspond to any hydraulically conductive features encountered, preferably horizontal bedding planes or vertical joint sets. In the absence of such features, the wells should be screened in the "B" zone. This should be clarified in the Legend on Figure 6 and submitted within 10 days of receipt of this letter.

6.0 Phase VI Expansion - Soil Vapor Sampling

- While we continue to believe that additional indoor air sampling is necessary to define the limits of structures requiring mitigation pursuant to the criterion established by Emerson/WSP (i.e., 0.8 $\mu\text{g}/\text{m}^3$ TCE), we concur in principle with a staged approach, as discussed in Sheila Harvey's June 20, 2007 letter. Specifically, the soil vapor study proposed in Section 6.0 of the Work Plan is to be performed at the onset of field work, and the preliminary analytical results are to be provided to the NYSDEC and the NYSDOH immediately upon receipt by Emerson/WSP. The NYSDEC and the NYSDOH will then identify, in consultation with Emerson/WSP, those structures that will require indoor air sampling during the 2007-2008 heating season to confirm the soil vapor results.
- Section 6.0 is hereby revised to state that all sampling and analysis associated with the Phase VI Expansion Area will be conducted in accordance with the NYSDOH soil vapor intrusion guidance. In addition:
 - The flow rate for both purging and collecting soil vapor samples will not exceed 0.2 L/min to minimize ambient air infiltration during sampling. Ambient air sample flow rates will be consistent with the flow rates for concurrent soil vapor samples (i.e., less than 0.2 L/min).

- Tracer gas will be applied and evaluated at each soil vapor sample location in accordance with Section 2.7.5 of the guidance. In particular, if high concentrations (> 10%) of tracer gas are observed in a sample, then the probe seal will be enhanced to reduce the infiltration of outdoor air.
 - A minimum reporting limit of 0.25 µg/m³ or less will be required for TCE and vinyl chloride.
- Additional information on how the duplicate soil vapor sample will be collected (i.e., Will a “T-connect” be used?) must be provided within 10 days of receipt of this letter.

8.0 Project Mobilization and Demobilization

- All work activities are to be conducted pursuant to an approved Health and Safety Plan (HASP) and a Community Air Monitoring Plan (CAMP). These documents are to be submitted within 10 days of receipt of this letter.

9.0 Project Schedule and Report Preparation

- After careful consideration of the scheduling concerns raised by Emerson in Ms. Harvey’s letter, the investigation/remediation schedule has been revised, as follows, to reflect the time frames specified by Emerson, while at the same time preserving the NYSDEC’s desire to have remediation activities commence during the 2008 construction season.

Milestone	Date
Field Work Complete (Excluding indoor air sampling)	October 12, 2007
Commencement of Indoor Air Sampling	November 2007
Remedial Investigation Report Submittal	December 7, 2007
Feasibility Study Report Submittal	March 3, 2008
Proposed Remedial Action Plan/ Public Comment Period	April 30, 2008
Record of Decision	May 31, 2008
Remedial Action Start	July 1, 2008

Appendix A - WSP Environmental Strategies SOPs

- The SOPs must be site-specific. For example, the information for "Dig-Safe New York" should be provided in SOP 23.

Please feel free to call me if you have any questions.

Sincerely,

Karen Cahill for

Gregg A. Townsend, P.E.
Regional Hazardous Waste Remediation Engineer

ec: Dale Desnoyers
Ken Lynch
Mary Jane Peachey
Karen Cahill
Carl Cuipylo
James Charles
Susan Shearer (NYSDOH - Troy)
Mark VanValkenburg (NYSDOH - Troy)
James Bulman (WSP)