

Ken and Regina Deschere 202 South Hill Terrace Ithaca, New York 14850

July 7, 2010

Ms. Karen A. Cahill
NYSDEC Region 7
615 Erie Boulevard West
Syracuse, NY 13204-2400

RE: Comments on PRAP for Morse Industrial Corp. Operable Unit No. 3 (OU3), Site 755010

Dear Ms. Cahill:

We have waited through more than six years of tests, studies, investigations, and evaluations to identify the many “Areas of Concern” in our neighborhood. The proposal to consider the replacement and venting of a 300-foot length of sewer as “the final remedy” to address all the Emerson-related problems in OU3 found so far is distressing. We realize that restoring the Emerson site and our neighborhood to “pre-disposal condition” is not practical. The former Morse plant site is NOT being fully remediated: buildings have had basements caulked and sealed, while others have been restricted to “DO NOT USE” status by Health and Safety Plan (HASP) policies. None of these steps remove the toxins as threats to migrate, nor do they remediate the property to meet clean-up standards for other uses.

We have been presented with many theories as to how our neighborhood came to be polluted with these chlorinated solvents. We’ve learned about the horizontal fracture at approximately 515 feet above mean sea level (MSL) which allowed toxins from the Fire Water Reservoir to spread. We’ve learned how the various sewer lines coming down South Cayuga Street and Turner Place had leaks and allowed the solvents to seep out into the rock and fill around them and the connections into our homes. Now, we are told that 300 feet of sewer along East Spencer Street will be replaced:

“This is also the area where the highest concentrations of TCE were detected in sub-slab soil vapor samples and, not coincidentally, where five of the nine homes requiring mitigation are located. Two prominent bedrock fractures are present directly below these homes (as well as three others on South Hill Terrace that also required mitigation), and it is believed that the fractures represent a primary mitigation pathway for contaminated soil vapor **from** the East Spencer Street sewer line to the homes.” [PRAP, page 9]

The proposed remedy would replace a sewer that runs at approximately 410-420 feet above MSL – see the attached “Figure 10 Groundwater Contour Map (October 2007)” from the 12/7/2007 SRI. This would likely reduce the potential for vapor intrusion into the homes on East Spencer Street. As the PRAP states [page 6]:

The highest concentrations of TCE and other VOCs have consistently been detected in samples collected directly over the sewer lines, while contaminant concentrations dropped off appreciably in samples collected as few as ten feet off the sewer lines.

The probability seems low that removal of this sewer will affect those homes within OU3 which are as much as 100 feet higher in the hill. Even if one accepts the theory about toxins moving UP these two fractures, why doesn't it also apply to the other two fractures identified as running down the hill from the plant site and through the neighborhood? See the attached "Figure 9 Exploratory Boring/Monitoring Well Locations" from the 4/4/2008 "Final Supplemental RI", which shows the FOUR "Possible Fracture Trends" in yellow. Is it not at least possible that the toxins have travelled DOWN the hill through these fractures too? Are we sure they won't continue to travel along all these fractures, under the "No Further Action" homes (such as ours) even if the sewer is cleaned up at the bottom of just two of them? If testing of homes in OU3 is discontinued (as was explained at the June 17 Public Meeting), how will anyone know?

While the toxin test values on East Spencer Street are high, this is not the only street in OU3 with high values along the sewers running from the Emerson site. From the attached "Figure 7 SOIL VAPOR POINT SAMPLE RESULTS 2004 TO 2008" from the 9/3/2009 "Sewers AAR", we find these troubling results from the residential section of upper South Cayuga Street:

SV-65 (PCE 4470 ug/m³, TCE 597 ug/m³)

VP-6 (PCE 2713 ug/m³, TCE 328 ug/m³)

and along the upper section of Turner Place:

SV-21H (PCE 3690 ug/m³, TCE 239 ug/m³)

SV-21I (PCE 695 ug/m³, TCE 644 ug/m³)

SV-36R (PCE 2890 ug/m³, TCE 1130 ug/m³).

Many locations within OU3 are relatively far from the East Spencer Street sewer, and it seems unlikely that their toxin levels will be significantly reduced by the proposed remedy. The geological uniqueness of the South Hill area, and the relatively little experience DEC has had with this type of remediation in similar situations, make it prudent to carefully measure the effectiveness of the remedy after it is installed. Yet we were told at the Public Meeting that only homes undergoing significant construction would be eligible for follow-up testing. The method is essentially unproven but the parties implementing it will not test in the neighboring homes to see what effects it has had?? This seems VERY ill-advised.

The DEC, DOH, and Responsible Parties all seem to accept the continuing presence of unremediated toxins under and around many Areas of Concern on the plant site. The decision NOT to address toxin-laden sewers other than those under a portion of East Spencer Street means that those of us further up the hill (but still in OU3) without mitigation systems will see no protection from these decades-old toxins. We know that home indoor-air tests are subject to significant sampling error, depending on the time of year and where in a basement tests were performed. (The "Temporal" tests performed monthly for more than a year by the DEC on our home make this clear.) This "remedy" offers nothing to those of us in homes which are surrounded by neighbors "lucky" enough to have received mitigation systems.

The stated Remedial Action Objective (RAO) for this effort is to:

Mitigate impacts to public health from existing, or the potential for, soil vapor intrusion into the indoor air of buildings near a site. [DEC slide at 6/17/2010 Public Meeting]

It is clear that the remediation efforts in this “clean-up” will never be fully successful. The mitigation systems are being counted on to protect the occupants of the homes in which they have been installed. Thus, to protect ALL the neighbors in OU3, mitigation systems should be offered for any home adjacent to a home with a system installed.

The walls and slabs of foundations of old houses can (and do) crack. As unmitigated pre-1920 homes grow even older, we question their ability to maintain their macro- and micro-integrity and to continue to keep industrial VOCs from intruding into living space. That is why “blanket mitigation” should be required as part of the PRAP: to ensure that the health of all residents in OU3 will be protected.

We are grateful that the Responsible Parties have continued to address the problems of these toxins. We are also grateful that the DEC has spent so much time and effort to move the process along. We sincerely hope that the PRAP will be changed to

- expand the areas in which sewers will be replaced to include the “hot spots” on Turner Place and South Cayuga Street,
- include an offer of blanket mitigation to all OU3 homes adjacent to houses with mitigation systems, and
- make provisions for continuing all forms of testing (soil vapor, sub-slab, indoor and ambient air) to measure the effects of the sewer changes

to be sure that the residents of our neighborhood receive the protections they need.

Thank you for your continuing work on this matter.

Sincerely,

Ken and Regina Deschere
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