

New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 7
615 Erie Boulevard West, Syracuse, New York 13204-2400
Phone: (315) 426-7519 • **FAX:** (315) 426-7499
Website: www.dec.state.ny.us



April 28, 2006

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

RE: Emerson Power Transmission - Ithaca, NY Facility
Aquifer Testing and Design Modification Work Plan (7/05)

Dear Mr. Chase:

The New York State Departments of Environmental Conservation and Health have reviewed the January 20, 2006 submittal from Emerson that responds to our January 10, 2006 letter requesting a status update on the referenced work. Your submittal adequately addresses the January 10th letter. All work described in the January 20th letter and July 2005 Work Plan are to be completed in accordance with the procedures and time schedules proposed. The State is to be contacted during the initial design stage of modifications to the treatment system so technical input can be provided at that time.

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

cc: Henri Hamel (NYSDOH)
ec: Mary Jane Peachey (NYSDEC)
Karen Cahill (NYSDEC)
Carl Cuiylo (NYDEC)
Geoffrey Laccetti (NYSDOH)

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April 28, 2006

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

RE: Emerson Power Transmission - Ithaca, NY Facility
Former NCR Sewer Line - Vadose Zone Sampling Results Report (1/06)

Dear Mr. Chase:

The New York State Departments of Environmental Conservation and Health have reviewed the referenced submittal. The sampling was conducted at four locations along this sewer line that traverses the east property line of the Emerson Facility. The report notes that Volatile Organic Chemicals (VOC's) were detected at all sample locations. The results from this sampling will be utilized with the current Environmental Investigations being conducted at both the Emerson Facility and the nearby former Axiohm (NCR) facility. It is noted that the sewer line tested allegedly services only the former Axiohm (NCR) facility.

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

cc: Henri Hamel (NYSDOH)
ec: Mary Jane Peachey (NYSDEC)
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April 28, 2006

Mr. Derek E. Chase
Director, Environmental Affairs
Emerson Power Transmission
800 West Florissant Avenue
P. O. Box 4100
St. Louis, Missouri 63136-8506

RE: Emerson Power Transmission - Ithaca, NY Facility
Former R&D Building-Focused Indoor Air Assessment
& Soil/Groundwater Investigation Report (10/05)

Dear Mr. Chase:

This office has received your submittal of February 28, 2006 responding to the New York State Departments of Environmental Conservation and Health comment letter of January 12, 2006 on the referenced report. It is noted that a previous response to our comments was sent by Emerson in a letter dated February 10, 2006. The responses contained in the February 28, 2006 letter adequately address the State's comments. Accordingly, the referenced report is approved.

The results from this report will be utilized in the on-going Environmental Investigation at the referenced facility. 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

cc: Henri Hamel (NYSDOH)
ec: Mary Jane Peachey (NYSDEC)
Karen Cahill (NYSDEC)
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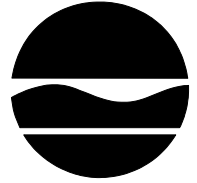
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Denise M. Sheehan
Commissioner

April 28, 2006

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

RE: Emerson Power Transmission-Ithaca, NY Facility
Turner Place Sanitary Sewer Line Investigation Work Plan (2/06)

Dear Mr. Chase:

The New York State Departments of Environmental Conservation and Health have reviewed the referenced submittal, dated March 20, 2006. This submittal is in response to the State's comment letter of March 7, 2006. The responses contained in the March 20th letter adequately address the State's comments on this work plan. Accordingly, the work plan is approved. The work is to be conducted according to the procedures and time frames contained in the referenced work plan. A final report is to be submitted to the State, per the work plan, upon completion of the study and receipt of final laboratory data.

Please contact this office when investigation work on this sewer line will begin. 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

cc: Henri Hamel (NYSDOH)
ec: Mary Jane Peachey (NYSDEC)
Karen Cahill (NYSDEC)
Carl Cuipyllo (NYDEC)
Geoffrey Laccetti (NYSDOH)

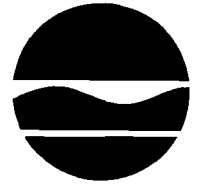
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Denise M. Sheehan
Commissioner

May 8, 2006

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

RE: Emerson Power Transmission - Ithaca, NY Facility
Onsite Assessment Report (12/05)

Dear Mr. Chase:

The New York State Departments of Environmental Conservation and Health have reviewed the referenced document. The following items will need to be satisfactorily addressed prior to final State review and approval of this document:

1. A listing of all known chemicals used by Emerson Power Transmission, as well as Borg Warner (to the extent known) is to be submitted. Emphasis is to be placed on the materials noted on Page 4 of the report.
2. Page 7 - An outdoor drum storage southeast of Building 13B is noted on a 1991 aerial photo. This area should be investigated. In addition, the coke operation in Bldg. 10 and machine shop in Bldgs. 1 and 2 identified on the 1910 Sanborn map should also be further investigated as these processes historically result in subsurface contamination. If possible, borings should be installed through the slab, and any utilities connected to these portions of the building should be further investigated (see related comment #7 below).
3. Page 9 - An unnamed perennial stream is noted as originating near Ithaca College and extending through the Emerson site, possibly under Building 34. The presence of this could be considered as a potential pollutant pathway and should be investigated further.
4. Page 11 - The report notes that soils from Areas 1 & 2 on Figure 2 (oily soil remediation) were removed in a previous DEC overseen investigation, however, contaminated soils remained onsite above standards. These areas should be reinvestigated.
5. Page 14 - Can any samples be taken in Building 6A to approximate the location of the former degreaser unit? In addition, soil and groundwater samples should be taken in the former scrap conveyor/loading area located at the south end of Cayuga Street. It is noted that previous remediation efforts have been conducted here.
6. For the Areas of Concern (AOCs) identified in the report on Figure 4 and recommended for inclusion as detailed in this letter, what initial activities for investigation are proposed? A separate work plan will be required for submittal and approval.

Mr. Derek Chase
Page 2
May 8, 2006

7. The location of onsite facility storm, sanitary, process and utility lines, as well as sumps, discharge structures, etc. should be investigated as potential pathways for pollutants.

8. It is recommended that any known above or below ground storage tanks be included as an AOC, if not already shown as such on Figure 4.

9. Why are the "former coal pile" areas not included for further investigation?

10. Why is Building #24, the former NCR Building, not included for further investigation?

11. Page 17 - Building #17 is noted as occupying a power house. Please note this building on Figures 2 and 4, and consider it for inclusion as an AOC. In addition, Building #18 (oil house) should be considered as an AOC.

12. As a general comment, the Sanborn Maps included in the report are not legible enough to determine site detail. Larger copies should be provided.

13. Should abandoned water supply lines on Turner Place be investigated similar to the sewer lines on this street?

14. The approved workplan for this project required a conduit survey to be performed on and offsite. This is not included in this report. See related comment #7 above.

15. What interviews have been conducted with present and past facility owners and workers, as well as any involved government officials and involved citizens? Local libraries and historical archives are to be researched as part of this assessment.

16. Page 24 - Please detail conceptually how the seven potential migration pathways will be further investigated.

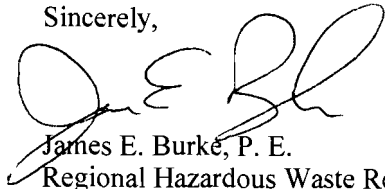
17. EPT has submitted two letter reports, dated 2/13/06 and 4/25/06, detailing indoor air testing at the EPT facility. The results from those tests indicate that VOCs are present in the facility subslab and indoor air at elevated levels for most locations sampled. The results from all subslab samples taken during both testing events requires that these locations be considered as AOCs that will require further investigation as potential source areas of contamination. It is noted that several of these sites do correspond to previously identified AOCs. The NYSDOH is currently reviewing the indoor air quality and subslab results from these sampling events, and comments on this will be provided under separate cover.

The above comments will need to be addressed prior to final State review and approval of the report. As noted on page 26 of the assessment report, a subsequent work plan will be required to be developed that will evaluate if identified AOCs have impacted site soil and groundwater. The goal of this subsequent evaluation will be to determine source areas that contribute to on and offsite environmental contamination. The plant study is to be utilized with the current geophysical survey work, aquifer test plan, data from on and offsite monitoring wells, and all related environmental information to determine source areas, subsequent migration pathways from the site to adjoining areas, and the nature and extent of contamination.

Mr. Derek Chase
Page 3
May 8, 2006

Please submit a response to this letter with thirty (30) days of receipt. If there are any questions on this letter, please contact this office at 315-426-7550.

Sincerely,

A handwritten signature in black ink, appearing to read 'James E. Burke', with a large, stylized flourish at the end.

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

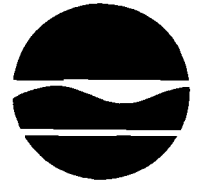
cc: Henri Hamel (NYSDOH)
ec: Mary Jane Peachey (NYSDEC)
Karen Cahill (NYSDEC)
Carl Cuipilo (NYDEC)
Geoffrey Laccetti (NYSDOH)

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Denise M. Sheehan
Commissioner

May 8, 2006

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

RE: Emerson Power Transmission - Ithaca, NY Facility
R&D Building Indoor Air Sampling Results (3/3/06 Letter)

Dear Mr. Chase:

The New York State Departments of Environmental Conservation and Health have reviewed the referenced submittal. The following comments are provided:

1. It is incorrect to refer to the 100 ug/m³ as a "NYSDOH guidance value" for 1,1,1-TCA. It is correct that the NYSDOH uses the soil vapor/indoor air Matrix 2 for interpretation of indoor air results for 1,1,1-TCA as well as for PCE.

2. The round one (September 2005) results interpretation, using Matrix 1 for TCE, called for additional monitoring. Interpretation of the second round (January 2006) was accomplished using the sub slab data from the first round as no sub slab samples were taken in the second. The matrix supports further monitoring on a periodic basis. Please see the attached table for an analysis of these results.

3. As noted in #2, further monitoring of this building for indoor air is warranted. Please submit a schedule for conducting this testing; emphasis is to be placed on conducting tests during the fall/winter heating season.

Please provide a response to the above comments within thirty (30) days of receipt of this letter. 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

JEB:klw
Attachment

cc: Henri Hamel, NYSDOH
ec: Mary Jane Peachey, NYSDEC
Karen Cahill, NYSDEC
Carl Cuipyllo, NYSDEC
Geoffrey Laccetti, NYSDOH

Sept. 2005

Location	#1	#1		#2	#2		#3	#3	
Sample Type	SS	IAB		SS	IAB/IABR		SS/SSR	IAB	
TCE (ug/m ³)	13.7	1.42		4.1	1.31/1.97		7.21/3.93	1.31	
Matrix Range/Result	5 to <50	0.25 to <2.5	Monitor	<5	0.25 to <2.5	Practical Actions	5 to <50	0.25 to <2.5	Monitor

Jan. 2006

Location		#4	#1			#5	#2	
Sample Type	SS *	IAB	IAF		SS/SSR *	IAB	IAF	
TCE (ug/m ³)	13.7	0.819	0.601		7.21/3.93	0.437	0.765	
Matrix Range/Result	5 to <50	0.25 to <2.5	0.25 to <2.5	Monitor	5 to <50	0.25 to <2.5	0.25 to <2.5	Monitor

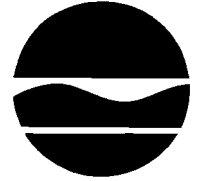
* Subslab data from Sept. 2005 sampling round used as sub slab samples were not collected during the January round.

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Denise M. Sheehan
Commissioner

May 8, 2006

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

RE: March 20, 2006 Geophysical Survey - Response to NYSDEC Comments
Emerson Power Transmission, Ithaca, New York

Dear Mr. Chase:

The New York State Department of Environmental Conservation (Department) has reviewed the above mentioned document. The following items are noted:

1. Emerson's response to NYSDEC Task 3 states that the final location and number of exploratory borings will be determined in the field. The location of these borings is critical and they must be placed in the exact locations identified by the electrical resistivity survey. Screen locations and lengths must also be determined by the Electrical Resistivity survey. Unlike investigations in homogeneous unconsolidated sediments, the exact placement of the wells to correspond to conductive zones in the jointed bedrock is critical and the locations must not be altered in the field.

2. Emerson's response to NYSDEC Task 7 states that new data will be correlated with existing well data. A tremendous amount of well data has been generated to date and the Department's files are currently incomplete. We request that Emerson provide legible copies of the geophysical logs from the February 1990 Remedial Investigation Report. We also request that the documents from which the information used in the analysis of conductive zones and the design of hydraulic testing be cited.

3. As you are well aware, the Department is keenly interested in the interconnectedness of the features identified to date, and the preferential migration pathway beneath and around the Emerson Power Transmission Facility. We intend to do a thorough review of upcoming Environmental Strategies submissions. A knowledge of what information upon which a given conclusion is based will expedite the review process as well as the decisions made regarding remediation of impacts on the surrounding community.

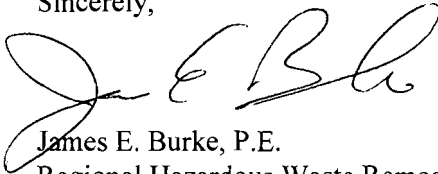
Mr. Derek E. Chase

-2-

May 8, 2006

Please prepare a response to the above items within thirty (30) days of receipt of this letter so the Geophysical Survey Report can be approved. If there are any questions on these letters, please contact this office at (315) 426-7550.

Sincerely,

A handwritten signature in black ink, appearing to read 'JEB', written over a white background.

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

JEB:klw

cc: Henri Hamel, NYSDOH

ec: Christopher Magee, NYSDEC
Mary Jane Peachey, NYSDEC
Karen Cahill, NYSDEC
Carl Cuipyllo, NYSDEC
Geoffrey Laccetti, NYSDOH

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May 8, 2006

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

RE: March 10, 2006 Proposed Supplemental Geophysical Survey
Emerson Power Transmission, Ithaca, New York

Dear Mr. Chase:

The New York State Department of Environmental Conservation (Department) has reviewed the above mentioned work plan. The following comments need to be satisfactorily addressed prior to final Department review and approval of the plan.

1. The plan outlines work that will further evaluate the conductive zones in eight areas identified by ESC as "having signatures and shapes consistent with potential water bearing zones." While the Department agrees that these may be water bearing zones, it does not rule out the possibility that the other zones identified by the July and September 2005 survey as being more conductive than the surrounding subsurface formations may also be hydraulically conductive. The Department reserves the right to ask for further definition around these zones if it is deemed necessary.

2. Azimuthal Square Array Direct Current Resistivity (USGS WRIR 01-4183, pg. 14 of 61) should be considered as a method to further define the three dimensional nature of the conductive subsurface features. Contact Christopher Magee (518-402-9549) of our Albany office for further details.

3. The work plan should state a report shall be prepared with the results of the survey along with a time frame for the report preparation and submittal.

4. The work plan should state that included within the report will be recommendations for additional monitoring wells and how the data will be analyzed to evaluate the best locations for these monitor wells.

5. The work plan should state that the Department will be notified before the commencement of field work so a Department representative could be scheduled to observe the work.

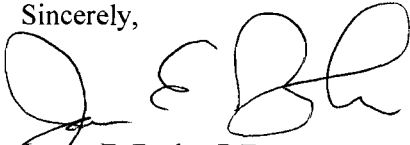
Mr. Derek E. Chase

-2-

May 8, 2006

Please respond to the above comments within thirty (30) days of receipt of this letter. If there are any questions on this letter, please contact this office at (315) 426-7550.

Sincerely,

A handwritten signature in black ink, appearing to read 'JEB', written over a horizontal line.

James E. Burke, P.E.

Regional Hazardous Waste Remediation Engineer

JEB:klw

cc: Henri Hamel, NYSDOH

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Karen Cahill, NYSDEC
Carl Cuipulo, NYSDEC
Geoffrey Laccetti, NYSDOH

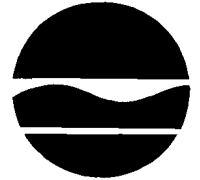
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Denise M. Sheehan
Commissioner

May 8, 2006

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

RE: Emerson Power Transmission - Ithaca, NY Facility
Semi-Annual Progress Report - 7/05 - 1/06

Dear Mr. Chase:

The New York State Departments of Environmental Conservation and Health have reviewed the referenced report. The following comments are offered:

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 on-going 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.

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

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.

4. Please submit an electronic copy of the report.

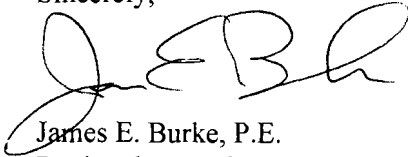
Mr. Derek E. Chase

-2-

May 8, 2006

Please respond to the above items within thirty (30) days of receipt of this letter. If there are any questions on this letter, please contact this office at (315) 426-7550.

Sincerely,

A handwritten signature in black ink, appearing to read 'JEB', with a large, stylized flourish extending from the bottom left of the signature.

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

JEB:klw

cc: Henri Hamel, NYSDOH

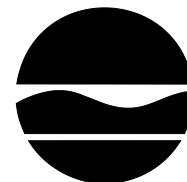
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Denise M. Sheehan
Commissioner

May 18, 2006

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

RE: Emerson Power Transmission - Ithaca, NY Facility
Correspondence to NYSDEC and NYSDOH

Dear Mr. Chase:

On March 15, 2006, NYSDEC sent you a letter requesting that correspondence agreements reached between Emerson, New York State Department of Environmental Conservation (NYSDEC), and New York State Department of Health (NYSDOH) be followed for all future correspondence. Please note that this request pertains to all written correspondence between Emerson and the Department, including email correspondence. Recent correspondence to NYSDOH regarding Phase IV indoor air testing results have not followed the agreed upon procedures. Correspondence requirements per the consent order must be followed.

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

JEB:kac

cc: Henri Hamel, NYSDOH
ec: Mary Jane Peachey, NYSDEC
Karen Cahill, NYSDEC
Carl Cuipyllo, NYSDEC
Geoffrey Laccetti, NYSDOH