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1 Introduction

WSP Environment & Energy, on behalf of Emerson and its subsidiary, Emerson Power Transmission (EPT), prepared this report describing the procedures and results of the sampling conducted of selected exhaust vents of sub-slab depressurization systems (mitigation systems) installed in structures in the South Hill neighborhood to the north of the EPT facility in Ithaca, New York. The sampling was conducted to evaluate emission concentrations and mass emission rates of chlorinated volatile organic compounds (VOCs) that may be present in the exhaust gas stream. The scope of the sampling was consistent with the Vent Sampling and Analysis Work Plan (April 7, 2008) which was approved by New York State Department of Environmental Conservation (NYSDEC) and York State Department of Health (NYSDOH) on April 29, 2008. The work plan was prepared and executed in accordance with requirements outlined in the July 13, 1987, Consent Order (Index # A7-0125-87-09) entered into by NYSDEC and EPT. The results of this sampling were used to assess the potential for ambient air impacts associated with operation of vapor mitigation systems installed in structures in the South Hill neighborhood.

Section 2 of the report presents background information including a description of the EPT site, an overview of the indoor air sampling sub-slab mitigation program, and a summary of the objectives of the vent sampling. This is followed by a description of the vent sampling program and procedures in Section 3. Results of the sampling are presented in Section 4 followed by conclusions in Section 5.

This report corrects the emission calculations for volatile organic compounds (VOCs) presented in the initial report dated September 23, 2008, which were based on incorrect conversion factors. Specifically, the values reported for stack emission concentrations (microgram per cubic meter [μ g/m³]) should have been divided by a factor of 1,000,000 rather than 1,000. In addition, the metric conversion factor for converting the measured stack flow rates from cubic feet per minute (ft³/min) to meters cubed per second (m³/s) should have been 0.0004719 versus the 0.004719 that was utilized. In total, the reported emission rates were thus overestimated by a factor of 10,000. Table 3 has been revised to reflect the correct emission rates.



2 Background

2.1 SITE LOCATION

The EPT facility is located at 620 South Aurora Street in Ithaca, New York. The facility comprises approximately 110 acres within the City of Ithaca and the Town of Ithaca in Tompkins County. There are over 30 buildings and structures on the site that encompass approximately 800,000 square feet. The area surrounding the facility is mostly residential. The South Hill community is to the north-northwest of the EPT site and is bordered on the north and west by Six Mile Creek, to the south by the EPT facility, and to the east by South Aurora Street.

2.2 OVERVIEW OF INDOOR AIR SAMPLING AND SUB-SLAB MITIGATION

Since 2004, Emerson and EPT have conducted an extensive sampling program to evaluate and address the potential for intrusion of VOC vapors to indoor air in the South Hill community. To date, sampling has been conducted in 104 structures and has involved concurrent sampling of indoor air on the first floor and basement level and collecting a soil gas sample below the basement slab of structures. In addition, outdoor (ambient) air samples were collected in the vicinity of homes being sampled on a particular day to establish ambient conditions. All sampling activities have been conducted in accordance with the approved work plan for Phase V Indoor Air Sampling, dated October 26, 2006, the approved general work plan for indoor air sampling, dated September 23, 2005, and the NYSDOH's Guidance for Evaluating Soil Vapor Intrusion in the State of New York, dated October 2006. In accordance with NYSDOH guidance, two rounds of sampling have been completed in the majority of the 104 structures within the study area. All sampling results have been evaluated based on the NYSDOH Soil Vapor/Indoor Air Matrix.

In March 2006, EPT and Emerson informed residents of the South Hill community of its voluntary offer to mitigate homes in which trichloroethylene (TCE) was detected in the basement or first floor indoor air samples at or above a concentration of $0.8 \ \mu g/m^3$ in at least one sampling event. This threshold is substantially below the state guidance level of $5.0 \ \mu g/m^3$ for TCE. Mitigation involves installing one or more extraction points beneath a structure from which soil vapor is withdrawn and released to the atmosphere through a vent stack. Each mitigation system is engineered specific to a structure so that a negative pressure is developed below the slab relative to the interior of the structure. Following installation, testing is performed to verify that the mitigation system is operating as designed. As of the end of 2007, mitigation systems have been installed in over 30 structures in the South Hill community.

2.3 VENT SAMPLING OBJECTIVES

Vent sampling was conducted to assess the actual mass emission rates of potentially site-related VOCs (1,1,1-trichloroethane, 1,2-dichloroethane, cis-1,2-dichloroethene [DCE], methylene chloride, tetrachloroethylene, trans-1,2-DCE, TCE, and vinyl chloride). The objectives of the sampling were to quantify actual emission rates of these VOCs and evaluate the potential for ambient air impacts associated with operation of vapor mitigation systems installed in the South Hill community. The mass emission rates were then compared to the 1.0 pound per hour (lb/hr) control requirements stated in 6NYCRR Part 212.



3 Sampling Program

3.1 SAMPLE LOCATIONS

Samples were collected at three properties designated by NYSDEC: properties 61, 87, and 97B. These properties were selected to provide a representative range of potential emission rates from the mitigation systems. Initially, property 78 was selected for sampling. However, based on the fact that the vent stack for the mitigation system could not be safely accessed by a ladder or scaffolding WSP requested an alternative property (61) for vent sampling. NYSDEC reviewed the access issue and agreed to the request.

3.2 SAMPLE METHODOLOGY

For the three properties tested, each vent was sampled in triplicate (three samples per vent). Each sample was collected sequentially over a 60-minute period. For purposes of quality control, a duplicate sample was collected in conjunction with one of the three triplicate samples collected from two of the vents (i.e., a total of two duplicate samples) at properties 61 and 97B. All three properties were sampled on July 8, 2008. A copy of the field notes recorded during the sampling event is included in Appendix A.

As part of the sampling, air flow characteristics (velocity, dry bulb temperature, wet bulb temperature) were measured to allow for mass emission rates to be calculated for each vent. Each vent stack has a 4-inch inside diameter.

One test port was installed (drilled) into each stack at least 32 inches (8 diameters) downstream of the fan. The downstream distance from the test port to the nearest flow disturbance was greater than two diameters in all cases. Flow rate measurements and sample collection were performed at each test port. Velocity measurements were recorded as 90 percent of the centroid value, with each sample collected at one point near the centroid of the stack.

The flow rate of exhaust gas through the vents was measured with a TSI VelociCalc hot wire anemometer. The anemometer was calibrated by the manufacturer within 12 months prior to the sampling. Dry bulb and wet bulb temperatures were measured using the thermocouple function of the TSI VelociCalc. No water condensation was observed during sample collection.

The gas samples were collected from the vent stacks in certified 6-liter SUMMA® canisters using certified sample trains. Sample gas was extracted through a short segment of new Teflon tubing connected to a dedicated single use certified flow regulator, which regulated the sampling flow rate so that each sample could be collected over a 60-minute period. The tubing and regulator were purged with sample gas before the sample collection was initiated.

Prior to sample collection, all sampling lines (tubing) were evacuated. To ensure no leaks are present during sampling, each connection was leak checked in the field using visual techniques. The sampling flow rate was calibrated to achieve a slight vacuum in the canister at the end of the sampling period. The initial and final vacuums were greater than 25 inches of mercury (in. Hg) and 1 in. Hg, respectively, and were recorded for each sample.

The canisters were delivered to Columbia Analytical Services in Simi Valley, California, for analysis via EPA Method TO-15 using selective ion monitoring mode (SIM) for the eight target compounds. The SIM mode was selected over the SCAN mode because it provides better resolution and sensitivity. The detection limits for these compounds were approximately 0.15 μ g/m³. The sample hold time for Method TO-15 is 30 days and the samples for the vent study were analyzed well within this time frame.



3.3 MITIGATION SYSTEM OPERATION

During the sampling event, the mitigation systems were operated in accordance with the engineering protocols established in the draft Operation, Maintenance, and Monitoring Plan (May 2007). Prior to the proposed vent sampling, the mitigation system was inspected. The vacuum at each sub-slab and sub-membrane suction point was checked and recorded. Each of the properties sampled had systems operating with a vacuum reading within ± 0.25 " H₂O of their respective commissioned values (defined as the standard operating parameters, such as vacuum and pressure, that are established when the mitigation system is initially installed). Consequently, no adjustments were necessary for the ventilation systems that were sampled.



4 Results

This section provides the results of the sampling as well as the calculated emission concentrations and mass emission rates of the target compounds identified in Section 2.3.

4.1 ANALYTICAL RESULTS

The gas samples collected during this project were analyzed for the site-specific target compounds (Table 1; Appendix B). In general, the majority of samples had constituent concentrations below the laboratory's method detection limit. For TCE the detected concentrations ranged from 4.5 to 10.0 μ g/m³ and for tetrachloroethylene detected levels ranged from 0.51 to 7.8 μ g/m³.

4.2 SAMPLING EVENT CONDITIONS

The work plan detailed the operating parameters that were to be maintained during the course of the sampling event. For each mitigation system, the appropriate operating pressure was attained throughout the sampling. The vent stack operating parameters measured during the sampling are provided in Table 2. For flow measurements, the values provided in Table 2 are 90 percent of the monitored centroid value, as prescribed in the work plan. No deviations were encountered during the sampling event.

4.3 MASS EMISSION RATES

Utilizing the gas analytical results for each property (Table 1) and vent operating parameters (Table 2), mass emission rates were calculated for each vent stack. WSP incorporated the methodology provided in the vent stack sampling work plan (Appendix C). The average TCE emission rates ranged from 1.23 x 10^{-6} to 3.31 x 10^{-6} lb/hr with a maximum value of 3.49 x 10^{-6} lb/hr. The highest individual compound measured was tetrachloroethylene, which had average emission rates of 1.85 x 10^{-7} to 3.60 x 10^{-6} lb/hr throughout the sampling with a maximum emission rate of 3.84 x 10^{-6} lb/hr.

The total emission rate of all VOCs sampled was also calculated. The average total emission rates ranged from 1.88×10^{-6} to 7.99×10^{-6} lb/hr with total maximum values ranging from 2.23×10^{-6} to 1.10×10^{-5} lb/hr. A summary of mass emission rates is provided in Table 3.



5 Conclusions

5.1 VENT STACK SAMPLING

The sampling of vent stacks at properties 61, 87, and 97B was performed under conditions consistent and in compliance with the work plan as no operational deviations were experienced during the sampling event. All sample canisters were operated, handled, and stored in accordance with the quality assurance/quality control provisions of the work plan.

5.2 MASS EMISSION RATES

Utilizing the operating parameters obtained at each property and the analytical results of each sample collected, average and maximum mass emission rates were calculated for the target compounds identified in the work plan, as well as total VOCs. The resulting calculations demonstrate that none of the vent stacks exhibit mass emission rates at or near the 1.0 lb/hr mass emission rate whereby NYSDEC would require controls. Individual and total mass emission rates for the site-related VOCs where one-tenth or less than the NYSDEC control emission rate. The results of the vent stack sampling in combination with the results of the focused ambient air sampling work conducted in July 2008 indicate that the emissions from mitigation systems are not a source of concern for TCE and PCE in the ambient air in the South Hill community

Tables

Table 1

Vent Stack Sample Data (a) Emerson Power Transmission Ithaca, New York

	Property 61				F	Property 8	7		Property 97B			
Sample ID: Sample Type:	61VS-1	61VS-2	61VS-2 (b) DUP	61VS-3	87VS-1	87VS-2	87VS-3	97BVS-1	97BVS-2	97BVS-2 DUP	97BVS-3	
Sampling Date:	07/08/08	07/08/08	07/08/08	07/08/08	07/08/08	07/08/08	07/08/08	07/08/08	07/08/08	07/08/08	07/08/08	
VOCs (µg/m3)												
1,1,1-Trichloroethane	0.42	0.33	0.3	0.33	1.6 U	1.9 U	3.1 U	0.18	0.18	0.56	0.17	
1,2-Dichloroethane	0.16 U	0.13 U	0.15 U	0.15 U	1.6 U	1.9 U	3.1 U	0.3	0.37	0.58	0.24	
cis-1,2-Dichloroethylene	0.16 U	0.13 U	0.15 U	0.15 U	1.6 U	1.9 U	3.1 U	0.14 U	0.44	0.14 U	0.16 U	
Methylene chloride	0.78 U	0.64 U	0.74 U	0.73 U	10	9.4 U	16 U	0.72 U	0.78 U	0.72 U	0.81 U	
Tetrachloroethene	7.1	7.7	6.7	7.8	2.9	1.9 U	3.1 U	0.51	0.8	1.2	0.53	
trans-1,2-Dichloroethene	0.16 U	0.13 U	0.15 U	0.15 U	1.6 U	1.9 U	3.1 U	0.14 U	0.16 U	0.18	0.16 U	
Trichloroethene	6.7	7.1	6.1	7	6.3	4.5	10	5.1	5	4.8	5.2	
Vinyl Chloride	0.16 U	0.13 U	0.15 U	0.15 U	1.6 U	1.9 U	3.1 U	0.14 U	0.16 U	0.14 U	0.16 U	
Other VOCs (µg/m3)												
Acetone	NA	NA	15	NA	NA	NA	NA	NA	NA	NA	NA	
2-Butanone	NA	NA	1.9	NA	NA	NA	NA	NA	NA	NA	NA	
Carbon tetrachloride	NA	NA	0.36	NA	NA	NA	NA	NA	NA	NA	NA	
Chloroform	NA	NA	1.6	NA	NA	NA	NA	NA	NA	NA	NA	
Dichlorodifluoromethane	NA	NA	1.9	NA	NA	NA	NA	NA	NA	NA	NA	
Ethyl acetate	NA	NA	1.3	NA	NA	NA	NA	NA	NA	NA	NA	
2-Propanol (Isopropyl Alcohol)	NA	NA	1	NA	NA	NA	NA	NA	NA	NA	NA	
Toluene	NA	NA	9.9	NA	NA	NA	NA	NA	NA	NA	NA	
Trichlorofluoromethane	NA	NA	1	NA	NA	NA	NA	NA	NA	NA	NA	
m&p Xylenes	NA	NA	1.4	NA	NA	NA	NA	NA	NA	NA	NA	

a/ DUP - duplicate sample NA - not analyzed

VOCs - volatile organic compounds

b/ This sample was analyzed for the entire list of VOCs

Table 2

Vent Stack Operating Parameters Emerson Power Transmission Ithaca, New York

Property	Stack Velocity (fpm) ^a	Volumetric Flow (cfm) ^a	Dry Bulb Temperature (°F)	Wet Bulb Temperature (°F)
61	1629	131	81.2	72.1
87	756	66	88.0	71.9
97B	747	65	82.7	71.2

a/ Represents 90 percent of centerline measurement; fpm = feet per minute; cfm = cubic feet per minute.

Table 3

Mass Emission Rates Emerson Power Transmission Ithaca, New York

Property 61					Property 87				Property 97B				
Stack Concentration				Stack				Stack					
			Concentration				Concentration						
	Avg.	Max.	Avg.	Max.	Avg.	Max.	Avg.	Max.	Avg.	Max.	Avg.	Max.	
Compound	(ug/m³)	(ug/m³)	(lb/hr)	(lb/hr)	(ug/m³)	(ug/m³)	(lb/hr)	(lb/hr)	(ug/m³)	(ug/m³)	(lb/hr)	(lb/hr)	
1,1,1-Trichloroethane	0.35	0.42	1.70E-07	2.07E-07	2.20	3.10	5.43E-07	7.65E-07	0.27	0.56	6.64E-08	1.37E-07	
1,2-Dichloroethane	0.15	0.16	7.25E-08	7.87E-08	2.20	3.10	5.43E-07	7.65E-07	0.37	0.58	9.08E-08	1.41E-07	
cis-1,2-Dichloroethylene	0.15	0.16	7.25E-08	7.87E-08	2.20	3.10	5.43E-07	7.65E-07	0.22	0.44	5.36E-08	1.07E-07	
Methylene chloride	0.72	0.78	3.55E-07	3.84E-07	11.8	16.0	2.91E-06	3.95E-06	0.76	0.81	1.85E-07	1.97E-07	
Tetrachloroethene	7.33	7.80	3.60E-06	3.84E-06	2.63	3.10	6.50E-07	7.65E-07	0.76	1.20	1.85E-07	2.93E-07	
trans-1,2-Dichloroethene	0.15	0.16	7.25E-08	7.87E-08	2.20	3.10	5.43E-07	7.65E-07	0.16	0.18	3.90E-08	4.39E-08	
Trichloroethene	6.73	7.10	3.31E-06	3.49E-06	6.93	10.0	1.71E-06	2.47E-06	5.03	5.20	1.23E-06	1.27E-06	
Vinyl Chloride	0.15	0.16	7.25E-08	7.87E-08	2.20	3.10	5.43E-07	7.65E-07	0.15	0.16	3.66E-08	3.90E-08	
Total Volatile Organics			7.72E-06	8.23E-06			7.99E-06	1.10E-05			1.88E-06	2.23E-06	

a/ Represents 90 percent of centerline measurement;

fpm = feet per minute; cfm = cubic feet per minute.



Appendix A – Field Data Sheets

8 718/03	9 1455 Collect flowrate atemp. 1D: 871 Velocity: 840 (ct Imin) Towrate: 0.24 (ct Imin) DB: 88.0 (cF) WB: 71.9 (cF)
1250 Supply Rows	1507 Collect Mourate + 4emp. [ID:61] VeTocity: 1810 ft/min Flowrate: 146 ft3/min DB: 81.29 WB: 72.19
1450 Concert Plan Rare AND TELPSHAWRE READINUS TD97B VUO 830 Filmin ELOW 6.3. ALIMIN DB 82.70F WB 71.2	516 Install probe at pibl No leaks present at pinction by probe and stack / YAY! No leaks present at tubing to can interface.

10	7 8 08	7/8/08
1524	161 VS 070808-1 setup	1600 Initiate sample: 0600 110:61 VS070808-1)
1530	Mob to setup at DI 97B	Can: 01201
1537	Install probe at 1978. No reaks at any of the 3 junctions.	Reg: OA226653 Starting Vacuum: 732195 Initiate 1659 Star Setup DW-1-PM on Can: 02501 Columba
1538	Mob to setup prove at 10.87 No leaks at any of the 3	Reg: OA01029 Starting voic: 29.5 inthe
1.24	Locations Junctions	1602 Setup: IDW-2-PMI OU
1549	Cottect/initiate sample [ID: 87VS070808-1] ram#: 02128 regulator: 0A00415 Starting vacuum: 730 inttg.	Can! 002482 thillnew Reg: 02482 thillnew Starting vac: 28 into Collect sample re
1550	Mitiate sample D: 97BVS07080871	F VP
	(an: 02276 Reg: 0A00655	1417 Collect sample [DW-2-PM] Final Vac: 18 MHG
	starting vacuum: 30inttg	I/1/9 Collect sample DW-1-PM7 Final vac: 5.5 inths











Appendix B – Laboratory Data Package and QA/QC Review

Data Usability Summary Report for Vent Stack Samples Collected near the EPT Site Ithaca, New York July 8, 2008

Introduction

This Data Usability Summary Report (DUSR) includes 11 air samples were collected on July 8, 2008, from three discrete vents attached to vapor mitigation systems installed in homes in the vicinity of the Emerson Power Transmission (EPT) site. The samples were analyzed by Columbia Analytical Services, Inc. of Simi Valley, California, for volatile organic compounds (VOCs), by U.S. Environmental Protection Agency (EPA) Method TO-15. The data were reviewed in accordance with the method and chain-of-custody criteria outlined in the National Functional Guidelines of Organic (October 1999) Data Review.

All holding times were met.

Volatile Organic Compounds

Eleven vapor samples were analyzed for VOCs by EPA Method TO-15. The data were reviewed for surrogate recovery, matrix spike/matrix spike duplicate (MS/MSD) recovery, blank contamination, instrument performance, calibration, and calculation criteria.

The reporting limits for sample 87VS070808-1 were elevated because the sample had to be diluted in order to get the analytes into the calibration range. The sample contained a relatively high concentration of propylene glycol. The WSP sampling team had used propylene glycol as a leak detector.

It was not necessary to qualify any of the VOC results.

Overall Assessment of the Data

The data presented are acceptable.

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Appendix C – Example Calculation for Emission Rate

Sample Calculations for Emission Rate

Following analysis by EPA Method 18, the analytical laboratory will provide a corrected organic concentration on a dry basis. This concentration must be applied to sampling event conditions to calculate a stack emission rate.

The concentration, provided in parts per million (ppm) or parts per billion (ppb), must then be converted to mass per volume using the following equation:

$$C_{c (g/m3)} = \frac{C_{c (ppm)} MW P_i}{R T_i (10^6)}$$
; where

	Corrected organic concentration, dry basis (ppm);
$C_{c (g/m3)} =$	Corrected organic concentration, dry basis (g/m^3) ;
MW =	Molecular weight of compound;
$P_i =$	Pressure at time of sample collection, mm Hg;
R =	Universal gas constant (0.0624 mm Hg-m ³ / ^o K-g mol);
$T_i =$	Temperature at time of sample collection, ^o K

Using the mass per volume concentration in conjunction with the gas stack volumetric flow rate, the pollutant mass flow rate can be calculated as follows:

$$M_p = Q_s \ CF \ C_c \ (g/m3)$$
; where

 $\begin{array}{lll} M_p &=& Pollutant \mbox{ mass flow rate (g/s);} \\ Q_s &=& Stack \mbox{ gas flow rate (cfm);} \\ CF &=& Conversion \mbox{ factor (cfm to m^3/s);} \\ C_{c \ (g/m3)} &= Corrected \mbox{ organic concentration, dry basis (g/m^3)} \end{array}$

Example: Calculate the equivalent emission rate for a stack under the following conditions:

1) Using the equation above, the measured concentration in units of mass per volume is:

$$C_{c (g/m3)} = \frac{(0.025 \text{ ppm})(131.4)(761.84 \text{ mm Hg})}{(0.0624 \text{ mm Hg} \text{-m}^{3})^{\circ}\text{K-g mol}(298 \text{ }^{\circ}\text{K})(10^{6})}$$
$$C_{c (g/m3)} = 1.346 \text{ x } 10^{-5} \text{ g/m}^{3}$$

2) Incorporating the conversion equation (above), the pollutant mass flow rate can be calculated as follows:

 $\begin{array}{lll} Q_s = & 60 \mbox{ cfm}; \\ CF = & 4.719 \ x \ 10\mbox{-}4 \ m^3\mbox{/}s\mbox{/cfm}; \\ C_{c \ (g\mbox{/}m3)} = & 1.346 \ x \ 10\mbox{-}^6 \ g\mbox{/}m^3 \end{array}$

 $M_p = (60 \text{ cfm})(4.719 \text{ x } 10-4 \text{ m}^3\text{/s/cfm})(1.346 \text{ x } 10^{-5} \text{ g/m}^3)$

 $M_p = 3.811 \text{ x } 10^{-7} \text{ g/s}$