



ITT Industries
Engineered for life

July 5, 2005

Mr. Frank Sowers, P.E.
NYSDEC, Region 8
6274 East Avon-Lima Road
Avon, NY 14414-9519

RE: RI/FS Work Plan
ITT Automotive Site #8-28-112
Town of Gates, Monroe County
Order on Consent: Index # B8-0614-02-05
Monthly Status Report #13 – June 2005

Dear Mr. Sowers:

This letter presents the monthly status report for the period ending June 30, 2005 for the ITT Automotive Site (#8-28-112) in the Town of Gates, New York. Status reports for the work performed at the Site are a requirement of the August 19, 2003 Order on Consent Index #B8-0614-02-05 between ITT Automotive, Inc. and the New York State Department of Environmental Conservation (NYSDEC).

1. Worked Performed:

- Beginning on 5/17/05 Investigation Derived Waste (IDW) was removed from the Site for proper off-Site disposal in accordance with all local, state and federal requirements. A Waste Disposal Tracking Form is kept updated, and a copy of this form along with all applicable disposal manifests will be included in the RI Report when submitted to NYSDEC. IDW profiling and disposal will continue during the implementation of the RI. Should NYSDEC like to see the log or manifests prior to submission of the RI Report, please let us know and we will forward them.
- On June 17, 2005 data from the pressure transducers were downloaded and the transducers were removed from the monitoring wells. As noted in the May 2005 monthly report, data was also previously downloaded on 5/17/05. Transducers had been installed on 4/26/05, and approximately 2 months of data were collected. These data are currently being reviewed.
- On 6/16/05 OBG transmitted an e-mail to NYSDEC including a table of historic ground water elevations which included the elevations for the first two quarters of 2005. The table indicated that ground water elevations during the first ground water sampling event in February 2005 were the highest or nearly the highest on record. OBG recommended that the February 2005 ground water sampling event be considered the high ground water sampling event, and requested NYSDEC concurrence. This correspondence also indicated that we would continue to measure ground water elevations quarterly, and expected that the low ground water sampling event would take place this summer (September 2005).
- On 6/16/05 NYSDEC responded to OBG's 6/16/05 email agreeing that the February 2005 sampling event can be considered the high ground water sampling event for this project.

2. *Results of Sampling, Testing and Other Data Received:*

- No results were received this period.

3. *Deliverables completed and submitted:*

- On June 1, 2005 completed and submitted the Monthly Status Report #12 for period through May 31, 2005 to NYSDEC.
- Other deliverables were not required for completion and/or submittal for the period ending June 30, 2005.

4. *Upcoming Work Activities (7/1/05 through 7/31/05 and beyond):*

- Evaluate transducer data
- Based on the transducer data evaluation, identify monitoring wells to be sampled as part of the storm water monitoring event and implement the storm water sampling. A list of wells and parameters recommended for sampling will be sent to the NYSDEC for review and approval in advance of the sampling. The date of the sampling event will be determined based on the occurrence of a storm event.
- On a 4/15/05 telephone call, NYSDEC requested that the transducer study and storm event ground water sampling be completed prior to selecting the wells for the vertical profiles using the passive diffusion bags. Following these two events and evaluation of the results, OBG will identify monitoring wells for ground water quality profiling using passive diffusion bags and implement the profile sampling. A listing of wells and parameters will be sent to the NYSDEC for review and approval in advance of the sampling.
- OBG will begin work on the Human Exposure Analysis including the pathway analysis and human exposure evaluation.
- As noted above, the low ground water sampling event is expected to take place in September, 2005. A listing of wells and parameters will be sent to the NYSDEC for review and approval in advance of the sampling.
- OBG will begin preliminary work on drafting of the RI Report, currently scheduled for submission in February 2006.

5. *Percent complete and unresolved delays:*

- Approximately 85% of the RI Work Plan field activities have been completed to date.

6. *Work Plan Modifications:*

- On April 26, 2005 the 1-month transducer study of continuous ground water elevation monitoring was initiated by installing transducers at the following monitoring well locations: ITT-SBW-5A, ITT-SBW-9, ITT-DBW-2, ITT-SBW-7, ITT-SBW-14, AMSF-MW-7, AMSF-MW-11S, AMSF-MW-13S, AMSF-MW-1S, AMSF-MW-1D, and AMSF-RW-2. On May 17, 2005 the data collected to date were downloaded from the transducers. Review of these data indicated that one moderate and one minor recharge event had occurred between April 26 and May 17, 2005. In order to provide an opportunity to monitor additional (and potentially more significant) recharge events, OBG proposed that the transducers remain in-place for an additional month. Both ITT and NYSDEC agreed with this work plan modification.
- Due to insufficient water column (~0.1 feet) in well ITT-MW-4, hydraulic conductivity testing could not be conducted. This issue will be discussed and any necessary Work Plan modifications will be resolved with NYSDEC.
- As noted in previous monthly reports, OBG awaits NYSDEC response as to whether identification of TICs are required as part of the analytical methods for the RI/FS program. Discussion regarding this

issue continues to be pursued.

- As noted in previous monthly reports, limited water column within AMSF-MW-1D and slow recovery of the water after purging resulted in insufficient water for 1,4-dioxane sample collection from this well in February, 2005. As discussed and agreed with NYSDEC, sampling for 1,4-dioxane will be prioritized for this well during subsequent sampling events.
- As noted in previous monthly reports, samples were not collected in February 2005 from AMSF-MW-4 due to the observation of surface water entering the well through a coupling in the well casing. This well will be evaluated again during the next scheduled sampling event.
- Additionally, samples were not collected from AMSF-MW-5S, AMSF-MW-8S or AMSF-MW-9D during the February 2005 sampling event due to damage to the wells. It was agreed these wells would not be repaired unless it was determined they would be required for further delineation as part of the RI.
- The RI/FS schedule has been revised and is attached. The revision to the RI/FS schedule identifies anticipated timeframes for the recharge ground water sampling event (which will be determined based on the occurrence of a storm event) and the "low ground water sampling event", to be conducted in September 2005. Anticipated timeframes for completion of the RI Report and Feasibility Study have also been modified due to the changes in completion of the outstanding ground water monitoring activities.

7. Citizens Participation Plan (CPP):

- There have been no activities by ITT in support of the CPP.

Please contact me at (714) 630-3175 if you have any questions regarding this information.

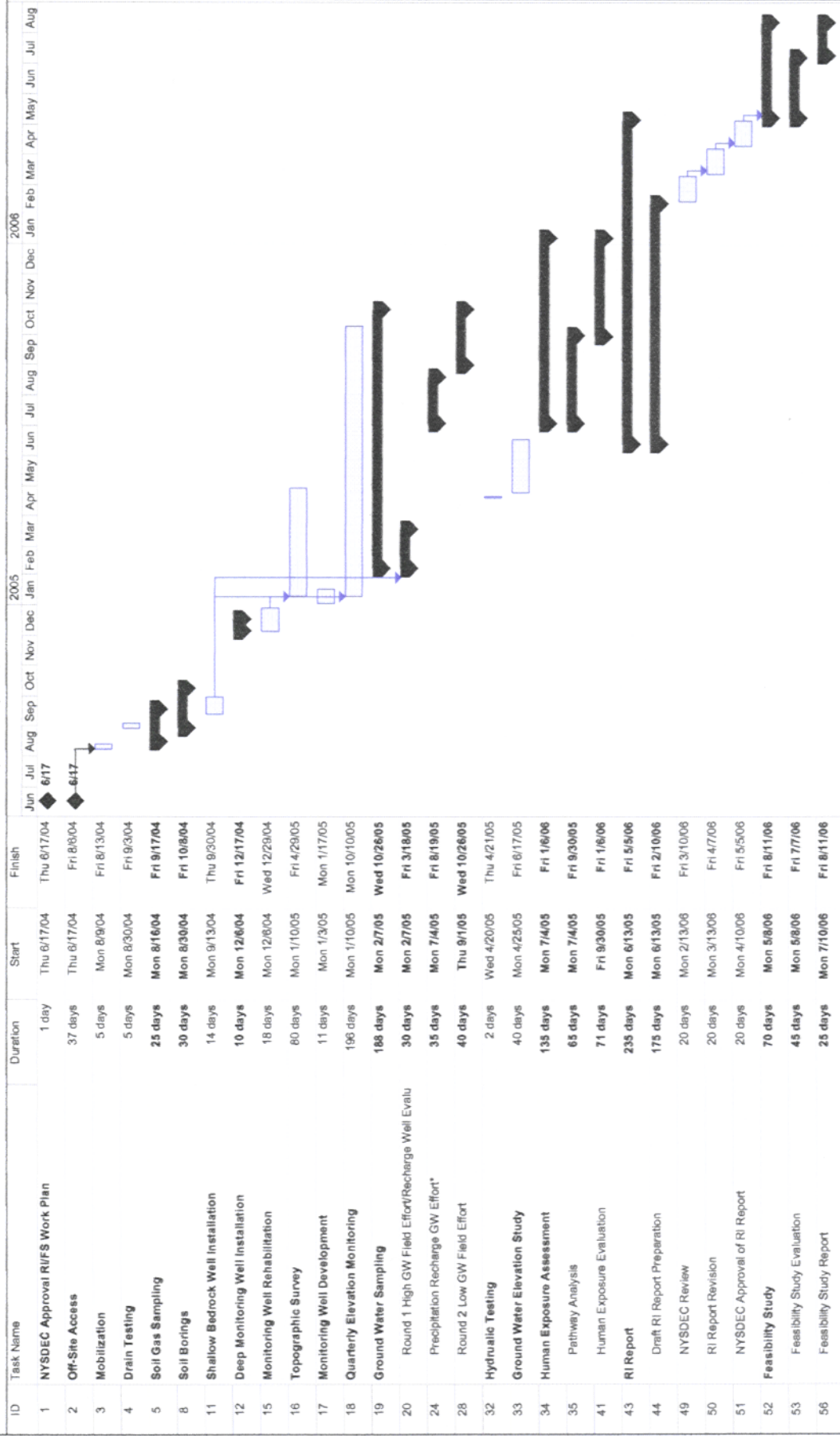
Sincerely,



Teresa P. Olmsted
Director, Environmental Programs
ITT Industries, Inc.

cc: D. McNaughton – NYSDOH
J. White – NYSDEC (electronic copy only)
J. Albert – Monroe County Health Dept. (electronic copy only)
G. Bailey – NYSDEC
M. Peters – LLG&M
G. Swenson – OBG
J. Danzinger – Day Environmental

Figure 6
Remedial Investigation/Feasibility Study Work Plan
ITT Automotive, Inc.
Town of Gates, NY
(Revised July 2005)



Project: RIFS Schedule
Date: Tue 7/5/05
Revised: July 5, 2005

Task Split Progress

Milestone Summary Project Summary

External Tasks External Milestone Deadline

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NOTE: * Schedule for initiation of the Precipitation Recharge GW Effort is dependent on suitable weather conditions