



**ITT Corporation**

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February 27, 2007

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

RE: RI/FS Work Plan  
Former ITT Rochester Form Machine Facility  
Site #8-28-112  
Town of Gates, Monroe County  
Order on Consent: Index # B8-0614-02-05  
Monthly Status Report #33 – February 2007

Dear Mr. Sowers:

This letter presents the monthly status report for the period ending February 28, 2006 for the Former ITT Rochester Form Machine Facility (#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. *Work Performed:***

- No fieldwork was performed this period.

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

- No results were received this period.

**3. *Deliverables completed and submitted:***

- On February 6, 2007 ITT completed the Monthly Status Report #32 for the period through January 31, 2007 and submitted it to NYSDEC.
- ITT completed and submitted the Phase II RI Work Plan to the NYSDEC on February 9, 2007.
- No other deliverables were required for completion and/or submittal for the period ending February 28, 2007.

**4. *Upcoming Work Activities (3/1/07 through 3/31/07):***

- Approval of the RI Phase II Vapor Intrusion Work Plan was granted by NYSDEC in a letter dated January 31, 2007. Five additional requirements for the Cinemark VI sampling were included in the letter.
- ITT met with Cinemark management on February 19, 2007 to discuss property access and for a preliminary facility inspection. Tentatively, ITT will be meeting NYSDEC, NYSDOH, and Cinemark on March 6, 2007 to select sampling locations. Sampling is tentatively scheduled for the week of March 12, 2007 during the 2006-2007 heating season as requested by NYSDEC.

**5. *Percent complete and unresolved delays:***

- With the exception of the modifications noted below, 100% of the NYSDEC approved RI Work Plan (dated June 17, 2004) field activities have been completed to date.



6. *Work Plan Modifications:*

- Due to insufficient water column (<0.1 feet) in well ITT-MW-4, ground water sampling could not be conducted during the Low Ground Water Sampling Event.
- Due to insufficient water column (<0.1 feet) in well ITT-MW-4, hydraulic conductivity testing could not be conducted. We propose that hydraulic conductivity testing not be performed at this well due to continued lack of water in the well.
- O'Brien & Gere and NYSDEC discussed whether identification of TICs are required as part of the analytical methods for the RI/FS program. For this project, TICs have been provided for the ground water sampling results. Conversations with Frank Sowers indicated that the NYSDEC would prefer to see TICs reported for the soil analyses of VOCs and SVOCs. The TIC summary for the soil analyses of VOCs and SVOCs was submitted to the NYSDEC in a letter dated December 2, 2005.
- Due to blockage at a depth of 15 ft bgs in AMSF-RW-2, the borehole geophysical surveys (video and caliper) were only completed to the depth of the blockage. This modification was acceptable to Frank Sowers.
- 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 was repaired on August 1, 2005 and has been incorporated into subsequent sampling events.
- 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 that these wells would not be repaired unless it was determined that they would be required for further delineation as part of the RI.

7. *Citizens Participation Plan (CPP):*

- There have been no recent 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 Corporation

cc: D. McNaughton – NYSDOH  
J. White – NYSDEC (electronic copy only)  
J. Albert – Monroe County Health Dept. (electronic copy only)  
J. Hausbeck – NYSDEC  
M. Peters – Peters, Hoggan & Carpenter, LLP  
G. Swenson – O'Brien & Gere  
J. Danzinger – Day Environmental