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April 9, 2009

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

RE: Monthly Status Report #58 – March 2009

Former ITT Rochester Form Machine Facility
Site #8-28-112
Town of Gates, Monroe County
Order on Consent: Index # B8-0614-02-05

Dear Mr. Sowers:

This letter presents the monthly status report for the period ending March 31, 2009 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 and the New York State Department of Environmental Conservation (NYSDEC).

1. Work Performed:

- On March 2, 2009, a Vapor Intrusion (VI) Work Plan was submitted to NYSDEC, via e-mail, presenting an approach to conduct a VI investigation at Batesville Casket Company (Batesville), located at 40 Pixley Industrial Parkway adjacent to the Site.
- On March 3, 2009, a Remedial Investigation (RI) Phase II Work Plan Addendum Proposed Modification 2 was submitted to NYSDEC (Frank Sowers), NYSDOH (Debbie McNaughton), and MCDOH (Jeffrey Kosmala) for review.
- On March 4, 2009, O'Brien & Gere (Mark Distler), accompanied by Maguire Family Properties, Inc (Dennis Maguire), met with EZ Movers and Bright Raven representatives to discuss the sub-slab depressurization mitigation system pre-design testing.
- On March 4, 2009, O'Brien & Gere (Mark Distler and Christy Rosenbarker), accompanied by Maguire Family Properties, Inc (Dennis Maguire) and NYSDOH (Debbie McNaughton), conducted site visits at the TCS Industries and Universal Equipment tenant spaces in the former AMSF building. Proposed sample locations were identified and agreed upon during the site visit.
- On March 5, 2009, NYSDEC (Frank Sowers) contacted O'Brien & Gere (Guy Swenson), via phone, to discuss details of the RI Phase II Work Plan Addendum Proposed Modification 2. NYSDEC requested a summary of bedrock matrix data that had been collected to date.
- On March 6, 2009, NYSDEC approved, via e-mailed letter, the VI Work Plan for Batesville as submitted on March 2, 2009. In addition, O'Brien & Gere (Mark Distler) notified NYSDEC (Frank Sowers), via e-mail, of the anticipated dates of probe installation (March 24) and sample collection (March 25) at Batesville.
- Between March 9 and March 13, 2009, O'Brien & Gere performed sub-slab depressurization mitigation system pre-design testing at the EZ Movers and Bright Raven tenant spaces in the former AMSF facility. In addition, samples of building materials were collected for asbestos analysis and submitted to Eastern Analytical Services, Inc.
- On March 23, 2009, O'Brien & Gere (Mark Distler) contacted NYSDEC (Frank Sowers), via e-mail, asking what regulatory agencies may be attending probe installation (March 24) and sample collection



(March 25). NYSDEC responded, via e-mail, stating that there may be no agency attendance. In addition, NYSDEC requested that a floor drain inside the Batesville building be evaluated to determine the function and discharge point for the drain. Based on the terms of the access agreement, no physical activities associated with the floor drain were conducted; however, O'Brien & Gere/ITT agreed to inquire about the drain while on-site.

- On March 23, 2009, O'Brien & Gere (Mark Distler) notified NYSDEC (Frank Sowers), via e-mail, that VI sample collection at Batesville would be delayed until Thursday (March 26).
- On March 23, 2009, in response to NYSDEC (Frank Sowers) request during the above referenced March 5, 2009 phone call, O'Brien & Gere transmitted, via e-mail, to NYSDEC a figure showing bedrock matrix volatile organic compound (VOC) results for boring AMSF-MW-17MP.
- On March 24, O'Brien & Gere installed sub-slab sampling probes at the Batesville building and on March 26 O'Brien & Gere collected sub-slab and indoor air samples per the approved March 2, 2009 work plan.
- On March 27, 2009, O'Brien & Gere (Christy Rosenbarker) notified NYSDEC (Frank Sowers), via e-mail, that O'Brien & Gere inquired of Batesville (Todd Bigelow) as to the discharge point for the building floor drain. Batesville indicated that the drain discharges to the sanitary sewer. In response, NYSDEC notified O'Brien & Gere, via e-mail, that the issue was considered closed.
- On March 30, 2009, ITT, O'Brien & Gere, NYDESC (Frank Sowers), and NYSDOH (Melissa Menetti) participated in a conference call to discuss the target analytes to be specified in the VI sampling work plan for the remaining tenant spaces at the former AMSF building. It was agreed that the full method TO-15 analyte list should be included in the work plan for the VI investigation work plan when submitted to NYDEC, NYSDOH, and MCDOH for review.

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

- Field measurements were obtained during communication testing at Batesville on March 26, 2009. These data are currently being evaluated and will be submitted to NYSDEC upon completion of the evaluation.
- Analytical results were received on March 27, 2009 and March 30, 2009 for asbestos containing materials sampled at the EZ Movers and Bright Raven tenant spaces in anticipation of the mitigation system designs. Copies of the laboratory results sheets are attached.

3. *Deliverables completed and submitted:*

- On March 2, 2009, a Vapor Intrusion (VI) Work Plan was submitted to NYSDEC, via e-mail, presenting an approach to conduct a VI investigation at Batesville, located at 40 Pixley Industrial Parkway, adjacent to the Site.
- On March 3, 2009, a Remedial Investigation (RI) Phase II Work Plan Addendum Proposed Modification 2 was submitted to NYSDEC (Frank Sowers), NYSDOH (Debbie McNaughton), and MCDOH (Jeffrey Kosmala) for review.
- On March 9, 2009, ITT completed the Monthly Status Report #57 for the period through February 28, 2009 and submitted it to NYSDEC.
- On March 23, 2009, a figure showing bedrock matrix VOC results for boring AMSF-MW-17MP was submitted to NYSDEC via email.
- No other deliverables were required for completion and/or submittal for the period ending March 31, 2009.



4. *Upcoming Work Activities (4/1/09 through 4/30/09):*

- Bedrock coring and matrix sampling has been temporarily suspended because of the natural gas encountered during drilling activities at AMSF-MW-17MP. Upon development and NYSDEC approval of a modified investigation approach, ITT will discuss with the NYSDEC the resumption of the Phase II investigation.
- A meeting between NYSDEC and ITT to discuss the RI Phase II Work Plan Addendum Modification 2 is scheduled for April 7, 2009.
- A Work Plan for the additional VI sampling at the former AMSF building will be submitted, and the sampling will take place.
- Preliminary results of vapor intrusion sampling at the Batesville building will be submitted to NYSDEC, NYSDOH, and MCDOH.

5. *Percent complete and unresolved delays:*

- RI/FS Work Plan
 - 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.
- Phase II RI Work Plan Addendum
 - Approximately 15% of the RI Phase II Work Plan Addendum field activities have been completed to date.

6. *Work Plan Modifications:*

- RI/FS Work Plan
 - 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.



- Phase II RI Work Plan Addendum

- Slight modifications to the locations of six monitoring wells were approved by NYSDEC via e-mail on November 19, 2007.
- A Remedial Investigation Work Plan Addendum Proposed Modification was submitted to NYSDEC on January 7, 2008 and was approved in a letter from NYSDEC dated January 14, 2008. The modification included revising packer test frequency to one packer test per day. FLUTe® hydraulic conductivity profiling would be conducted in lieu of packer tests every ten feet. Resulting conductivity data, in conjunction with bedrock matrix sampling and borehole geophysical logging, will be used to select multi-port sampling intervals.
- Dr. Beth Parker, formerly of the University of Waterloo, has changed employers to the University of Guelph. Portions of RI Phase II Work will be conducted by both O'Brien & Gere and their subcontractors and staff from the University of Guelph, the University of Waterloo, and Stone Environmental, with supervision by Dr. Beth Parker. Laboratory analyses were still conducted at the University of Waterloo until the laboratory was relocated to the University of Guelph. The laboratory move was completed at the end of May 2008. Regardless of the laboratory location, all analyses are currently conducted under the supervision of Dr. Beth Parker. The QAPP remains unchanged except for the reference to the University of Waterloo, which is changed to the University of Guelph.
- The January 2008 Monthly Status Report (#44, dated February 5, 2008) included a modified Table 6 of the RI Phase II Work Plan Addendum (Laboratory Analytical Decision Matrix) that inadvertently omitted the methanol extract analysis by Columbia Analytical Services from the original table.
- Modifications to the schedule for the start of bedrock coring and matrix sampling were made due to subcontractor availability. Originally, this work was scheduled to begin November 12, 2007 but was rescheduled to begin February 4, 2008. The revised schedule was submitted with the January 2008 Monthly Status Report (#44, dated February 5, 2008).
- In accordance with an e-mail transmitted to NYSDEC on February 22, 2008, a packer system would be used to bypass a known storm water roof drain connection in the casing at recharge well ITT-W-1 while drilling at ITT-MPBW-21.
- In accordance with an e-mail to NYSEDC dated February 22, 2008, and approved by NYSDEC in and e-mail dated February 25, 2008, groundwater grab samples were collected from 64 to 79 ft bgs at location ITT-MPBW-22 and from 69 to 80 ft bgs at location AMSF-MW-19MP by use of a packer system and submitted to the laboratory for analysis of VOCs by USEPA 8260B, SVOCs by USEPA 8270C, and TPH by USEPA 1664A.
- Mud rotary drilling techniques and installation of grout in water bearing zones were approved by NYSDEC on March 3, 2008 to be used where necessary to limit water production when reaming boreholes.
- In accordance with an email transmitted to NYSDEC and approved on March 20, 2008, borehole AMSF-MW-17MP was abandoned on March 21, 2008.
- In accordance with an email transmitted to NYSDEC on March 24, 2008 and approved on March 25, 2008, the FLUTe® with NAPL sensitive cover was installed in borehole AMSF-MW-18MP on March 26, 2008. The FLUTe® with NAPL sensitive cover was to be installed in borehole AMSF-MW-17MP per the approved Remedial Investigation Phase II Work Plan Addendum.
- A work plan for Proposed Additional Vapor Intrusion Investigation at the former AMSF building was approved by NYSDEC on March 14, 2008, and implemented between March 27 and 28, 2008.



This vapor intrusion sampling was performed during this heating season. The sampling included collecting samples from seven paired, sub-slab and indoor air, sampling locations. As noted above, a slight modification to the vapor intrusion sample location in the EZ Movers storage area was approved by NYSDEC during sample location selection at the former AMSF facility. Also as noted above, early termination of vapor intrusion sampling (approximately 7 hours versus 8 hours) at Bright Raven Gymnastics was approved on March 28, 2008 by NYSDEC due to unexpected occupancy of the facility.

- On May 15, 2008, due to the lack of permeable soils at sample location SV-01, the sample location was moved approximately 5 feet east from that presented in the RI Phase II Work Plan Addendum onto the ITT parking lot and set at 14 inches below grade. This alternate location was selected after several failed attempts to advance the sample probe in the proposed location.

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: K. Comerford – NYSDOH
J. Kosmala – Monroe County Health Dept. (electronic copy only)
J. Hausbeck – NYSDEC
M. Peters – Stockli Greene Slevin & Peters, LLP
G. Swenson – O'Brien & Gere
J. Danzinger – Day Environmental



ATTACHMENTS

Eastern Analytical Services, Inc.

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Bulk Sample Results

RE: CPN 35273/004.114 - ITT AMSF - Gates, New York


Date Collected : 03/09-13/2009

Collected By : Eric Alongi

Date Received : 03/24/2009

Date Analyzed : 03/27/2009

Analyzed By : Kevin Stascavage

Signature : 

Analytical Method : NYS-DOH 198.6

NVLAP Lab No. 101646-0

NYS Lab No. 10851

Client O'Brien & Gere, Inc.
5000 Brittonfield Parkway
East Syracuse, NY 13057

Sample ID Number	030909-001	031109-02	03-13-09-003	03-13-09-003
Layer Number			1	2
Lab ID Number	1753724	1753725	1753726	1753726
Sample Location	CTSH 1	Office	BR Entrance	BR Entrance

Sample Description	Gray Tile	Carpet Mastic	Tile and Carpet Mastic (Tile Layer)	Tile and Carpet Mastic (Mastic Layer)
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Analytical Method	Plm	Plm	Plm	Plm
Appearance	Layered	No	No	No
	Homogenous	Yes	Yes	Yes
	Fibrous	No	No	No
	Color	Gray	White	Beige

Asbestos	% Amosite	0.0	0.0	0.0	0.0
Content	% Chrysotile	0.0	0.0	0.0	0.0
	% Other	0.0	0.0	0.0	0.0
	% Total Asbestos	0.0	0.0	0.0	0.0
Other	% Organic	16.6	55.7	14.6	60.2
Materials	% Carbonates	80.8	23.3	83.9	15.8
Present	% Other Inorganic	2.6	21.0	1.5	24.0

Results Applicable To Those Items Tested. Report Cannot be Reproduced, Except Entirely, Without Written Approval of the Laboratory.

Liability Limited To Cost Of Analysis. This Report Must Not be Used by the Client to Claim Product Endorsement by NVLAP or Any Agency of the US Government.

These Results Cannot Be Used To Claim That NOB Items Tested Are Non-Asbestos Containing (Unless "% Other Inorganic", As Reported Above, Is Less Than One Percent).

AIHA Accreditation No. 100263 Rhode Island DOH No. AAL-072T3 Massachusetts DOL No. A A 000072 Connecticut DOH No. PH-0622 Maine DEP No. LA-024 Vermont DOH No. AAS-2095

Eastern Analytical Services, Inc.

Page 1 of 1

Bulk Sample Results

RE: CPN 35273/004.114 - ITT AMSF - Gates, New York

Date Collected : 03/09-13/2009

Collected By : Eric Alongi

Date Received : 03/24/2009

Date Analyzed : 03/28/2009

Analyzed By : Ghayath Elias

Signature :

Analytical Method : NYS-DOH 198.4

NVLAP Lab No. 101646-0

NYS Lab No. 10851

Client O'Brien & Gere, Inc.
5000 Brittonfield Parkway
East Syracuse, NY 13057

Sample ID Number		030909-001	031109-02	03-13-09-003	03-13-09-003
Layer Number				1	2
Lab ID Number		1753724	1753725	1753726	1753726
Sample Location		CTSH 1	Office	BR Entrance	BR Entrance
Sample Description		Gray Tile	Carpet Mastic	Tile and Carpet Mastic (Tile Layer)	Tile and Carpet Mastic (Mastic Layer)
Analytical Method		Tem	Tem	Tem	Tem
Appearance	Layered	No	No	No	No
	Homogenous	Yes	Yes	Yes	Yes
	Fibrous	No	No	No	No
	Color	Gray	Yellow	White	Beige
Asbestos Content	% Amosite	0.0	0.0	0.0	0.0
	% Chrysotile	0.0	0.0	0.0	0.0
	% Other	0.0	0.0	0.0	0.0
	% Total Asbestos	0.0	0.0	0.0	0.0
Other Materials Present	% Organic	16.6	55.7	14.6	60.2
	% Carbonates	80.8	23.3	83.9	15.8
	% Other Inorganic	2.6	21.0	1.5	24.0

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