



ITT Corporation

Anaheim, CA 92807
tel 714-630-3175
fax 714-630-0855

May 6, 2009

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

RE: Monthly Status Report #59 – April 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 April 30, 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 April 7, 2009, a meeting was held at the NYSDEC office in Avon, NY with NYSDEC (Frank Sowers and Bart Putzig) regarding the Remedial Investigation (RI) Phase II Work Plan Addendum Proposed Modification II submitted to the NYSDEC on March 3, 2009. Attending for ITT were Stockli, Greene, Slevin & Peters (Mike Peters), O'Brien & Gere (Guy Swenson), and, via telephone, Dr. Beth Parker of the University of Guelph. Proposed protocols and standard operating procedures were discussed in an effort to help better understand and address the challenges associated with drilling in the presence of natural gas.
- On April 8, 2009, NYSDEC (Frank Sowers) sent an e-mail to meeting attendees and others at ITT, O'Brien & Gere, the New York State Department of Health (NYSDOH), and the Monroe County Department of Public Health (MCDOPH) outlining discussion points and action items from the April 7 meeting.
- On April 9, 2009, ITT's counsel received an email from Cinemark USA, Inc. expressing concerns over further drilling in the wells on the Cinemark property that could result in encountering natural gas. Cinemark commented that after reviewing the materials regarding the modifications to the Phase II RI Work Plan to account for the possibility of encountering natural gas (i.e., the RI Phase II Work Plan Addendum Proposed Modification 2, dated March 3, 2009 and related natural gas mitigation protocol and standard operating procedures), Cinemark would prefer that further drilling on the Cinemark property not take place unless it is determined that further drilling is necessary.
- On April 15, 2009, ITT's counsel received a letter from Maguire Family Properties' (MFP's) counsel providing further comments on behalf of MFP regarding the RI Phase II Work Plan Addendum Proposed Modification 2 and related natural gas mitigation protocol and standard operating procedures. The letter stated that MFP previously submitted opposition to the proposed natural gas mitigation system that must be employed for the proposed deep bedrock drilling through its consultant Day Environmental, Inc. in an email dated April 6, 2009. The April 15 letter went on to state that MFP would like the NYSDEC and ITT to reconsider whether the additional deep bedrock coring process below 150 feet is necessary because of potential risks. The letter also stated that if the NYSDEC and



ITT insisted on continuing this aspect of the RI, MFP would seriously consider whether to revoke ITT's access to the property for this aspect of the RI.

- On April 20, 2009, NYSDEC (Frank Sowers) contacted O'Brien & Gere (Mark Distler) by phone to inquire about the status of additional Vapor Intrusion (VI) sampling at the former AMSF building. NYSDEC requested an update on the availability and timing of receiving SUMMA canisters from the laboratory.
- O'Brien & Gere responded to the NYSDEC's April 20 request with a follow up e-mail on April 20, 2009. The e-mail indicated that canisters were available and that they would be ordered when access to the property was granted for VI sampling. NYSDEC responded by e-mail, on the same day, requesting that O'Brien & Gere order the required canisters in preparation for sampling prior to the end of the heating season.
- On April 22, 2009, O'Brien & Gere received preliminary VI sample results from the laboratory for sampling performed at Batesville Casket Company on March 26, 2009. The preliminary sample results were transmitted to NYSDEC (Frank Sowers), NYSDOH (Katie Comerford), and MCDOPH (Jeffrey Kosmala) by e-mail on April 27, 2009.
- On April 24, 2009, O'Brien & Gere submitted a letter to NYSDEC, via e-mail, regarding sampling limitations of MFP for additional ITT VI sampling at the former AMSF building. While the April 6, 2009 agency-approved work plan proposed analyzing vapor samples for the full TO-15 compound list, MFP advised ITT that it would deny ITT and its consultants access to the property for VI sampling unless the analysis for VI sampling is limited to the following 6 compounds: 1,1,1-trichloroethane, tetrachloroethene, 1,1-dichloroethane, 1,1-dichloroethene, cis-1,2-dichloroethene, and trichloroethene. The O'Brien & Gere letter stated that if, despite the limitations imposed on ITT by MFP, ITT conducted the additional VI sampling on the MFP property in accordance with its obligations under the Consent Order, it will only be able to analyze the samples for the six compounds listed above under the access rights that MFP is willing to grant ITT for this sampling event. NYSDEC responded with a letter that same day, via e-mail, approving analysis of only the six compounds per MFP's access limitations.

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

- Field measurements were obtained during sub-slab depressurization mitigation system pre-design testing at Bright Raven and EZ Movers tenant spaces in the former AMSF facility between March 9 and 13, 2009. These data will be compiled and submitted to NYSDEC with the next monthly report.
- Sample results from Batesville Casket Company VI sampling were received from the laboratory on April 22, 2009 and submitted, via e-mail, to NYSDEC, NYSDOH, and MCDOPH on April 27, 2009.

3. *Deliverables completed and submitted:*

- On April 9, 2009, ITT completed the Monthly Status Report #58 for the period through March 31, 2009 and submitted it to NYSDEC.
- No other deliverables were required for completion and/or submittal for the period ending April 30, 2009.

4. *Upcoming Work Activities (5/1/09 through 5/31/09):*

- 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 scheduling for the resumption of the Phase II investigation.
- Sampling results from the additional VI sampling performed at the former AMSF building will be submitted to NYSDEC following receipt from the laboratory.



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 an 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 Department of Public Health (electronic copy only)
J. Hausbeck – NYSDEC
M. Peters – Stockli, Greene, Slevin & Peters, LLP
G. Swenson – O'Brien & Gere
J. Danzinger – Day Environmental