



ITT Corporation

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August 7, 2009

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

RE: Monthly Status Report #62 – July 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 July 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 July 14, 2009, a draft Soil Vapor Intrusion (VI) Sampling Results letter for VI sampling conducted at the former AMSF building on April 30, 2009 was submitted to NYSDEC (Frank Sowers), NYSDOH (Katie Comerford), and MCDOH (Jeffrey Kosmala) for review.
- On July 15, 2009, NYSDEC approved the draft Soil Vapor Intrusion Sampling Results letter with revisions.
- On July 17, 2009, the Soil Vapor Intrusion Sampling Results letter was submitted to Maguire Family Properties, Inc. (Dennis Maguire).
- On July 21, 2009, a conference call was held with NYSDEC (Frank Sowers), O'Brien & Gere (Mark Distler), and ITT (Lisa Hall) to discuss the delivery date of the Technical Memorandum that will be prepared to present the results of the VI sampling that has been conducted at the former AMSF facility and the results of the communications testing that has been conducted at the Bright Raven and EZ Movers tenant spaces in the former AMSF facility. It was agreed that the Technical Memorandum would be due to NYSDEC on September 18, 2009. In addition, NYSDEC requested that a submittal date be provided in this monthly report for the Revised Proposed Modification 2 to the RI Phase II Work Plan Addendum. ITT will submit this Revised Modification to NYSDEC by September 4, 2009 or sooner, if possible.

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

- No results were received this period.

3. Deliverables completed and submitted:

- On July 10, 2009, ITT completed the Monthly Status Report #61 for the period through June 30, 2009 and submitted it to NYSDEC.
- On July 17, 2009, ITT submitted a letter transmitting the Soil Vapor Intrusion Sampling Results to Maguire Family Properties, Inc., in accordance with applicable State regulations.
- No other deliverables were required for completion and/or submittal for the period ending July 31, 2009.



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4. *Upcoming Work Activities (8/1/09 through 8/31/09):*

- Bedrock coring and matrix sampling has been temporarily suspended because of the natural gas encountered during drilling activities at AMSF-MW-17MP. Based on discussions with NYSDEC, a revised, modified investigation approach is being finalized for submittal to NYSDEC. Upon approval of the revised approach by NYSDEC, the remaining elements of the Phase II investigation will be scheduled.
- The Revised Proposed Modification 2 to the RI Phase II Work Plan Addendum will be submitted to NYSDEC by September 4, 2009 or sooner, if possible.

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



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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,

A handwritten signature in blue ink, appearing to read "Teresa P. Olmsted".

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