



ITT Corporation

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December 8, 2010

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

RE: Monthly Status Report #78 – November 2010

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 November 30, 2010 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:*

- No field work was performed this period.

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

- No results were received this period.
- On November 12, 2010, Guy Swenson informed the NYSDEC, via e-mail, that groundwater sampling results collected in September 2010 were submitted for validation and that one table with fully validated and qualified results from both the April/May and the September sampling events, along with the data validation report for each event, would be submitted to the state upon completion. On November 15, 2010 Frank Sowers responded by e-mail stating that the approach was acceptable.

3. *Deliverables completed and submitted:*

- Monthly Status Report #77 for the period through October 31, 2010 was submitted November 10, 2010.
- No other deliverables were required for completion and/or submittal for the period ending November 30, 2010.

4. *Upcoming Work Activities (12/1/10 through 12/31/10):*

- The analytical results received from the groundwater sampling conducted in September 2010, which were submitted to NYSDEC with Monthly Status Report #77 as preliminary data, are currently undergoing validation.
- The ITT project team will continue to organize and analyze the data collected to date during the Phase II investigation.



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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 100% 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, groundwater sampling could not be conducted during the Low Groundwater 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 groundwater 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 NYSDEC 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.
- A RI Phase II Work Plan Addendum Proposed Modification 2 Revised was submitted to NYSDEC on September 4, 2009 and was approved in a letter from NYSDEC dated September 14, 2009. The modifications were necessary to reduce the likelihood of encountering natural gas while drilling and



safely manage natural gas if encountered. Modifications include replacement of well AMSF-MW-17MP with AMSF-MW-18MP, an alternative terminal boring depths of 150 ft bgs, a Natural Gas Mitigation Protocol, standard operating procedures, and a modified Health & Safety Plan.

- A RI Phase II Work Plan Addendum Proposed Modification 3 was submitted to NYSDEC on February 12, 2010, and was approved in a letter from NYSDEC dated February 17, 2010. The modifications were necessary due to encountering natural gas while drilling at a shallower depth than anticipated. In addition, there is no significant off-setting benefit to be derived from continued drilling due to the potential risks the natural gas presents to the field personnel and surrounding property owners, tenants, and members of the public.
- Rehabilitation of well AMSF-MW-12S was proposed to NYSDEC via e-mails on July 19, 20 and 22, 2010 and was approved by NYSDEC via e-mail on July 22, 2010. Rehabilitation of well AMSF-MW-12S was necessary due to collapse of the open bedrock corehole as was reported in the April Monthly Status Report #71.
- Well AMSF-MW-12S was repaired on August 16, 2010, as reported in the August Monthly Status Report #75.
- Well AMSF-MW-12S was added to the second round groundwater sampling event (conducted in September 2010) with NYSDEC approval.

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 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 Slevin & Peters, LLP
G. Swenson – O'Brien & Gere
J. Danzinger – Day Environmental