New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road, Avon, New York 14414-9519
Phone: (585) 226-2466 • **FAX:** (585) 226-8696
Website: www.dec.ny.gov

Alexander B. Grannis
Commissioner

March 14, 2008

Ms. Teresa P. Olmsted
ITT Industries, Inc.
1054 N. Tustin Avenue
Anaheim, CA 92807

Dear Ms. Olmsted:

Re: Proposed Additional Vapor Intrusion Investigation
AMSF Building, 12 Pixley Industrial Parkway; March 12, 2008

Former ITT Rochester Form Machine Facility
Site # 8-28-112
Town of Gates, Monroe County

The New York State Department of Environmental Conservation (NYSDEC) has completed its review of the March 12, 2008 work plan for Proposed Additional Vapor Intrusion Investigation (Vapor Intrusion Work Plan) at the AMSF Building located at 12 Pixley Industrial Parkway in the Town of Gates, Monroe County. Based upon the information and representations given in the Vapor Intrusion Work Plan, the Vapor Intrusion Work Plan is hereby approved.

NYSDEC understands that the samples will be collected during the current heating season. Please contact me at (585) 226-5357 when the field work has been scheduled or if there are any difficulties with scheduling.

Sincerely,

Frank Sowers

Frank Sowers, P.E.
Environmental Engineer 2

cc:
file

ec.
B. Putzig
J. Hausbeck
J. Danzinger
Guy Swenson
J. Albert
D. McNaughton
Scott Tucker
Michael Peters
M. VanValkenburg

ITT Corporation

1054 N. Tustin Avenue
Anaheim, CA 92807
tel 714-630-3175
fax 714-630-0855

March 12, 2008

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

RE: Proposed Additional Vapor Intrusion Investigation
AMSF Building, 12 Pixley Industrial Parkway

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:

As a follow up to our letter to you dated November 16, 2007, this letter presents ITT's proposal to conduct additional vapor intrusion investigation of the former Alliance Metal Stamping and Fabricating (AMSF) building at 12 Pixley Industrial Parkway adjacent to the Former ITT Rochester Form Machine Facility (RFM) (#8-28-112) in the Town of Gates, New York. This proposed investigation is based on:

- previous sub-slab and indoor air sampling conducted by O'Brien & Gere (for ITT Corporation) on August 20, 2004 and February 25, 2005,
- previous sub-slab and indoor air sampling conducted by Day Environmental (for Maguire Family Properties, Inc., the current owner of the former AMSF property) on March 1, 2005, sent to ITT by NYSDEC on May 24, 2007 and
- findings of a building evaluation conducted by O'Brien & Gere on January 17, 2008, and attended by Maguire Family Properties, Day Environmental, New York State Department of Environmental Conservation (NYSDEC), and Monroe County Department of Health.

Previous Sampling

Previous sub-slab and indoor air sampling was conducted at three locations in the northwest corner of the former AMSF building. Results of the sampling are shown on Figure 1 (attached). The results indicated that there was 1,1,1-trichloroethane (TCA) and tetrachloroethylene (PCE) in sub-slab samples at each of the three sampling locations in the former AMSF building. TCA and PCE have also been observed in vapor monitoring at the former RFM Site. The results also indicated that there were non-RFM-related compounds[1] (primarily dichloromethane [DCM] or methylene chloride) in sub-slab samples at each of the three sampling locations in the former AMSF building. DCM (non-RFM related) was found at higher concentrations in the sub-slab at two of the three sampling locations than any RFM-related compound. DCM was also found in indoor air at much higher concentrations (by roughly two orders of magnitude) than any RFM-related compounds.

[1] RFM related compounds are those that have been found at the former RFM Site, but not necessarily the result of a source at the former RFM Site.

ITT

Building Evaluation

In our November 16, 2007 letter, ITT requested[2], and NYSDEC approved, a building evaluation to assess building use, layout, heating and cooling systems, and to conduct a chemical inventory. As mentioned above, O'Brien & Gere conducted the evaluation attended by NYSDEC and others on January 17, 2008. O'Brien & Gere prepared the attached summary of findings of the building evaluation. The findings identified the source of DCM as well as sources of petroleum-related compounds, such as benzene, toluene, ethylbenzene, and xylenes.

It is evident that Universal Equipment Sales is the source of DCM in indoor air because large quantities of DCM-containing adhesives were found on Universal's production floor during the building evaluation. Universal uses the adhesives in the manufacturing of counter tops. Universal is adjacent to the Bright Raven Gymnastics space, which is adjacent to the E-Z Movers space where previous sampling found elevated concentrations of DCM in the indoor air (Sample IDs: IA-2, AMSF-IA2 on Figure 1). Through smoke testing of doorways in the Universal and Bright Raven Gymnastics spaces, O'Brien & Gere determined that the Universal indoor air pressure is positive relative to an adjacent hallway common to Bright Raven Gymnastics, making it evident that Universal is causing the previously measured elevated DCM indoor air levels.

Large quantities of machining oils, lubricants, coolants, hydraulic oils, acetone parts washers, alcohol based degreasers, and mineral spirits were found in the area occupied by TCS Industries, Inc. Machining oils and lubricants were prevalent in the area occupied by Lockwood Precision Manufacturing. Both areas had high levels of oil odors in the indoor air. Sampling in these areas would likely reveal elevated levels of petroleum compounds.

In addition, a drainage trench was found in the Premium Armored Services (PAS) space. According to an employee, the trench has contained blue-green oily liquid from the adjacent TCS area. PAS indicated they would turn on a sump pump installed in the trench to pump out the liquid to an unknown discharge point. This situation may represent a potential source to the sub-slab or sub-surface due to possible leaks and/or emissions from the trench and/or discharge line.

Proposed Additional Investigation

Based on the sources of DCM and petroleum compounds found during the building evaluation, ITT proposes to conduct additional vapor intrusion investigations in building spaces immediately adjacent to the former RFM Site, meaning spaces on the west side of the former AMSF building, except for spaces that use large quantities chemicals. ITT proposes to collect concurrent sub-slab and indoor air samples (sample pair) at the locations shown on Figure 2 and as described below:

- EZ-Movers – one sample pair in office area and one sample pair in storage area near east wall
- Bright Raven Gymnastics – one sample pair in gym area near west wall, one sample pair in gym area near east wall (common to Universal), one sample pair in the break room
- Time Wise Cleaning – one sample pair in the office area
- Downey Goodlein – one sample pair in office area (not in back storage area)

At this time we are not proposing sampling in the TCS and Lockwood areas due to the high likelihood that chemical use activities in those spaces dominate the sub-slab conditions.

---

[2] Letter from Teresa Olmsted, of ITT, to Frank Sowers, of NYSDEC, dated November 16, 2007.

ITT

Ambient air samples (one or two depending on the variability of forecasted wind directions) will also be collected upwind of the building. Samples would be collected during the sample day. Sampling duration will be approximately 8 hours per sample. The sample collection procedures used for other vapor intrusion investigations for this site[3] will be followed; they are in general conformance with the New York State Department of Health (NYSDOH) vapor intrusion guidance document.

Samples (canisters) will be delivered under routine Chain-of-Custody protocols to Test America of Burlington, Vermont, which is certified by the Environmental Laboratory Approval Program (ELAP) and certified by NYSDOH for USEPA Method TO-15. Samples will be analyzed following Method TO-15 for the compounds that were evaluated for other vapor intrusion investigations for this site.[3] Samples of indoor air and ambient air will be collected in canisters that were individually-certified clean. Sub-slab sample canisters will be batch-certified clean.

Duplicate samples and trip or equipment blanks will not be collected as part of this sampling event. Analytical QA/QC requirements of Method TO-15 will be followed by the laboratory. Data will be validated and a data usability summary report (DUSR) will be prepared. Data qualifiers will be identified in tables, figures and in subsequent reporting.

Results will be evaluated to assess vapor intrusion of 1,1,1-TCA and PCE in these areas. The interpretation of the results will be based on the NYSDOH Soil Vapor/Indoor Air matrices. Other compounds, such as gasoline related compounds (alkanes and benzene, toluene, ethylbenzene, and total xylenes), DCM, tetrachloroethene, and trichloroethene will be reported but will not be considered RFM-related, and any follow-on actions to address impacts related to these compounds will not be the responsibility of ITT. Of course, ITT reserves all of its rights to seek cost recovery with respect to any and all actions it undertakes with respect to the RFM-related compounds, such as TCA and PCE,

Preliminary validated data in the form of summary tables, laboratory reports, map of sampling locations, and field forms will be submitted to NYSDEC and NYSDOH within one week of receipt of the data from the laboratory. Upon receipt of the final DUSR (validated data), a draft letter to the building owner will be prepared and promptly submitted to NYSDEC and NYSDOH for comment. State law requires that testing results be delivered to property owners within 30 days after receipt of validated data, so these efforts will be scheduled in order to meet that statutory deadline.

The final sampling report containing validated data will be submitted, and will consist of the following:

- Sampling program overview
- Sampling and analytical methods
- Field forms
- QA/QC results and discussion
- Laboratory reports, data sheets and Chain-of-Custody Forms (Category B documentation)
- Results and discussion
- Data evaluation (including Tables and Figures)
- Conclusions and Recommendations

[3] "Remedial Investigation Phase II Work Plan Addendum," August 2007, Appendix A, O'Brien & Gere Engineers, Inc.

ITT

The intent is to conduct this sampling this heating season. Once we receive written approval of this work plan, we will notify the building owner and schedule the sampling day. In the meantime, please contact me at (714) 630-3175 if you have any questions regarding this information.

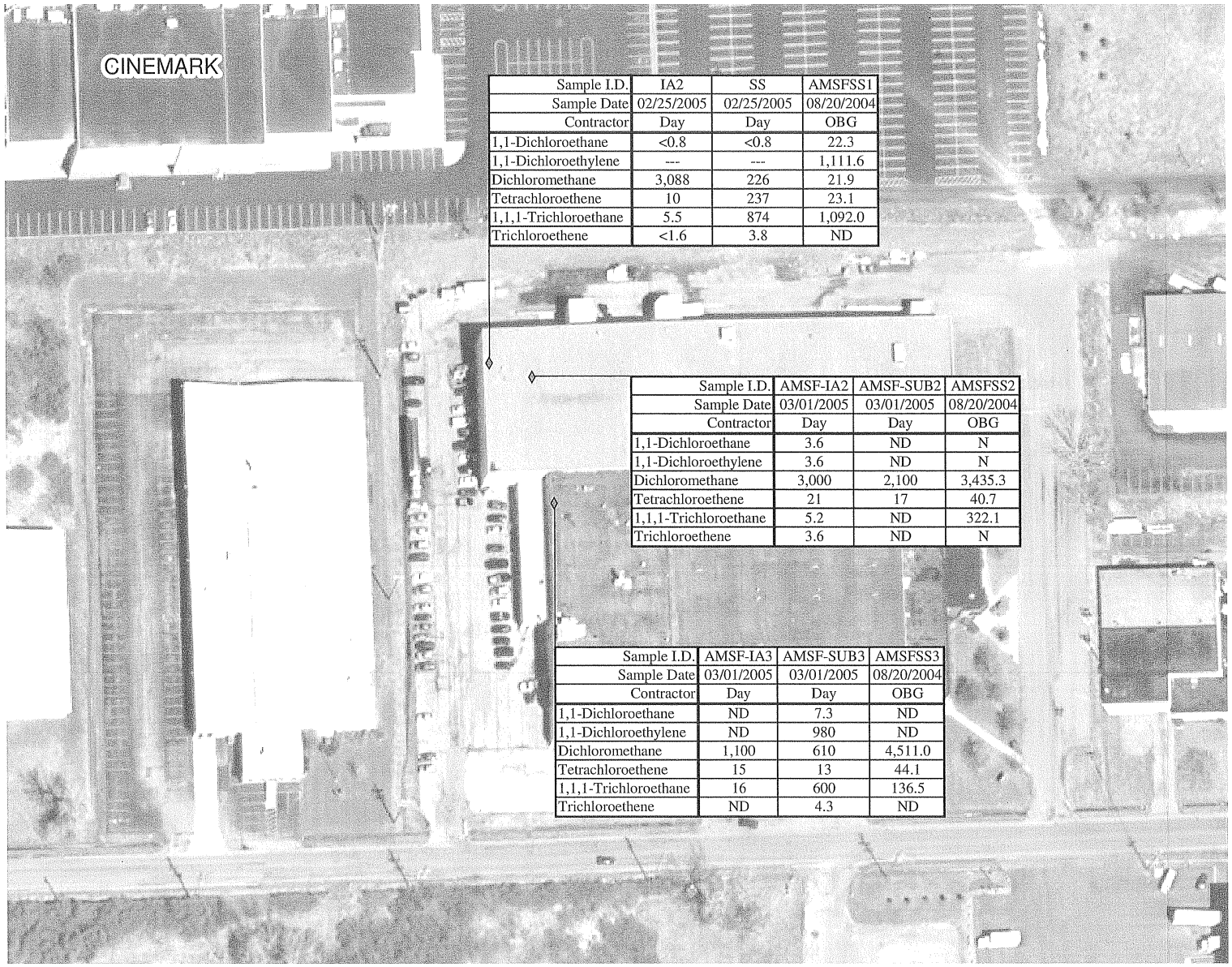
Sincerely,

Teresa P. Olmsted
Director, Environmental Programs
ITT Corporation

Attachments: Figure 1, Previous Sampling Results
Figure 2, Proposed Vapor Intrusion Sampling Locations
Attachment A, Former AMSF Building Evaluation, O'Brien & Gere Memorandum

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

T:\3356_ITT\Rochester\MXD\356273\VI\FEB 2008 PROPOSED INV\AMSF_VI_Databox_FIG_1.mxd



Sample I.D.	IA2	SS	AMSFSS1
Sample Date	02/25/2005	02/25/2005	08/20/2004
Contractor	Day	Day	OBG
1,1-Dichloroethane	<0.8	<0.8	22.3
1,1-Dichloroethylene	---	---	1,111.6
Dichloromethane	3,088	226	21.9
Tetrachloroethene	10	237	23.1
1,1,1-Trichloroethane	5.5	874	1,092.0
Trichloroethene	<1.6	3.8	ND

Sample I.D.	AMSF-IA2	AMSF-SUB2	AMSFSS2
Sample Date	03/01/2005	03/01/2005	08/20/2004
Contractor	Day	Day	OBG
1,1-Dichloroethane	3.6	ND	N
1,1-Dichloroethylene	3.6	ND	N
Dichloromethane	3,000	2,100	3,435.3
Tetrachloroethene	21	17	40.7
1,1,1-Trichloroethane	5.2	ND	322.1
Trichloroethene	3.6	ND	N

Sample I.D.	AMSF-IA3	AMSF-SUB3	AMSFSS3
Sample Date	03/01/2005	03/01/2005	08/20/2004
Contractor	Day	Day	OBG
1,1-Dichloroethane	ND	7.3	ND
1,1-Dichloroethylene	ND	980	ND
Dichloromethane	1,100	610	4,511.0
Tetrachloroethene	15	13	44.1
1,1,1-Trichloroethane	16	600	136.5
Trichloroethene	ND	4.3	ND

This document was developed in color. Reproduction in B/W may not represent the data as intended.

FIGURE 1

LEGEND

◊ VAPOR INTRUSION SAMPLE

NOTE: UNITS IN UG/M3

FORMER ITT ROCHESTER FORM MACHINE FACILITY
TOWN OF GATES, NEW YORK
SITE #8-28-112

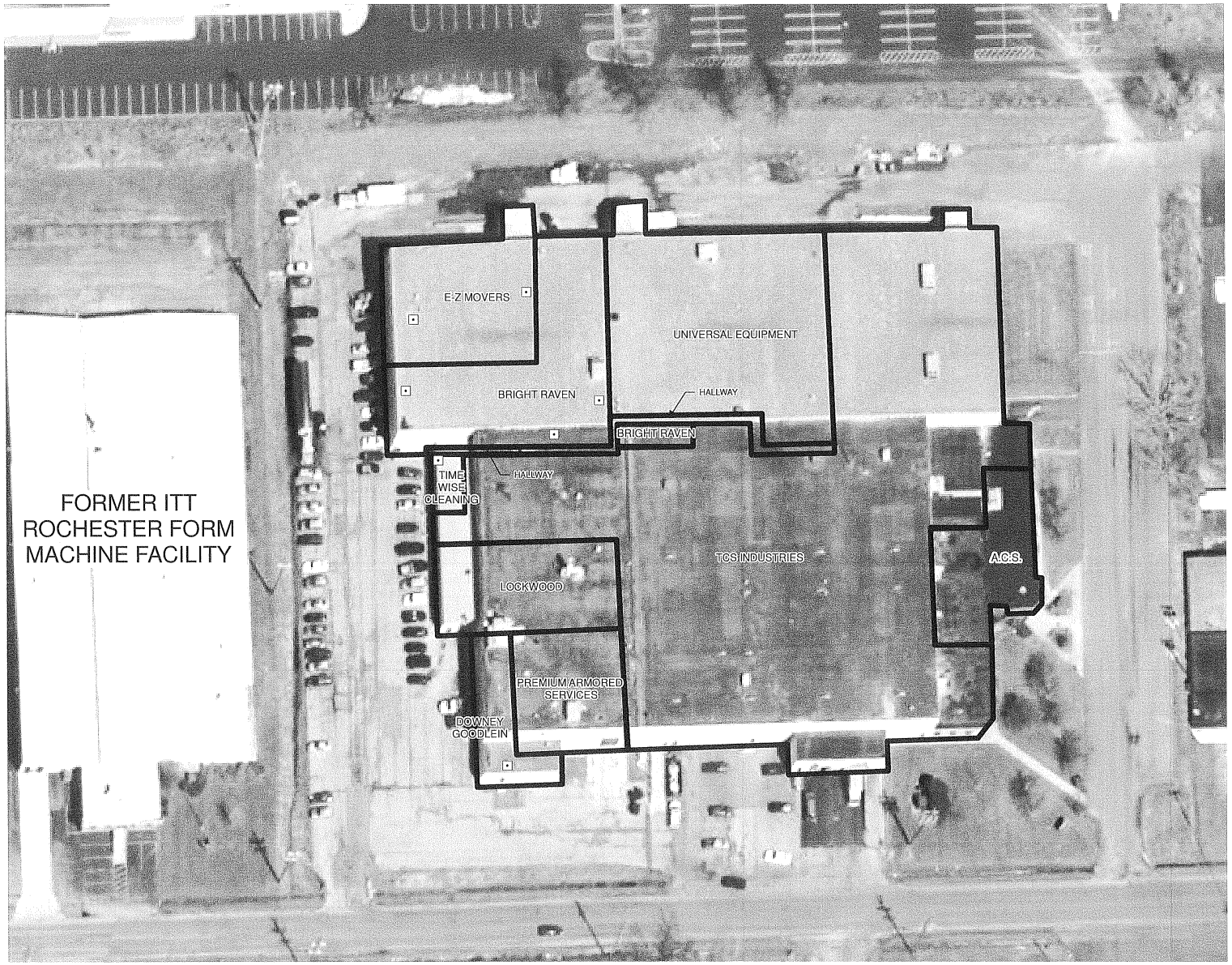
PREVIOUS SAMPLING RESULTS

0 25 50 100 150 200
Feet

FEBRUARY 2008
3356/35273

O'BRIEN & GERE ENGINEERS, INC.

T:\3356_ITT\Rochester\MXD\35273\V\FEB 2008 PROPOSED INV\Prop_VI_Sample_Location_Figure_2.mxd



This document was developed in color. Reproduction in B/W may not represent the data as intended.

PLOT DATE: 02/26/08 SMT DIV 07:1

FIGURE 2

LEGEND

⊡ PROPOSED SUB-SLAB ANSD INDOOR AIR SAMPLE LOCATION

NOTE: SUB-SLAB SAMPLE LOCATIONS, INDOOR AIR SAMPLE LOCATIONS, AND TENANT BUIILDING SPACES ARE APPROXIMATE

FORMER ITT ROCHESTER FORM MACHINE FACILITY
TOWN OF GATES, NEW YORK
SITE #8-28-112

PROPOSED VAPOR INTRUSION SAMPLING LOCATIONS

0 20 40 80 120
Feet

FEBRUARY 2008
3356/35273

O'BRIEN & GERE ENGINEERS, INC.

ATTACHMENT A

FORMER AMSF BUILDING EVALUATION
O'BRIEN & GERE MEMORANDUM

To:	File	*cc:*	ITT
From:	Mark Distler/Scott Tucker		M. Peters (PH&C)
Re:	Former AMSF Building Evaluation		
File:	3356/35273		G. Swenson (O'Brien & Gere)
Date:	March 12, 2008		

On January 17, 2008, O'Brien & Gere (Mark Distler and Scott Tucker) met with Frank Sowers of the New York State Department of Environmental Conservation (NYSDEC), Joseph Albert of the Monroe County Department of Health, Jeff Danzinger of Day Environmental, and Felix Caruthers of Maguire Family Properties to perform a building evaluation at the Former Alliance Metal Stamping & Fabrication facility (AMSF) building. The evaluation was performed consistent with the November 16, 2007 letter to NYSDEC as part of activities required by the Phase II RI Work Plan Addendum.

The following are observations from the building evaluation:

Building Layout:

A. Multiple tenants occupy this building conducting various operations. The attached drawing was provided by Jeff Danzinger just prior to the start of the building evaluation.
   1. Bright Raven Gymnastics: Gymnastics Center
   2. Time Wise Cleaning: Janitorial cleaning company
   3. E-Z Movers: Moving and storage company
   4. Universal Equipment Sales: Counter top manufacturing
   5. Affiliated Computer Services (ACS): Data management company
   6. TCS Industries Inc.: Machine and tool shop, metal parts manufacturing
   7. Premium Armored Services: Armored transportation service
   8. Downey Goodlein: Elevator installation and maintenance company
   9. Lockwood Precision Manufacturing: Machine and tool shop, metal parts manufacturing

B. Common hallway shares walls in central portion of the building with the following companies (otherwise all other companies have exterior doors only):
   1. TCS Industries
   2. Bright Raven Gymnastics
   3. Universal Equipment Sales
   4. Time Wise Cleaning

Bright Raven Gymnastics

A. Layout: Main room with break room attached (13,500 sq. ft), and small rumbling room (approximately 575 sq. ft)
   1. TCS Industries & Universal Equipment Sales share common walls with the main room.
   2. TCS Industries shares common concrete block walls with the small room

B. Main Room
   1. Flooring: Linoleum, carpet, tumbling mats, trampoline pit
   2. HVAC
      a. Space heaters mounted near ceiling
      b. HVAC return air grille on south wall
      c. Side-wall fan blowing air from main room over central hallway (above hallway ceiling) into small tumbling room.
      d. Blocked off vent in roof
   3. Pressure: Negative relative to the outdoors, negative to common hallway.
   4. Chemical Inventory: Cleaning products

C. Small Tumbling Room
   1. Flooring: concrete, tumbling mats, minor cracks and seams observed in the floor
   2. Pressure: Positive relative to hallway
   3. HVAC
      a. Side-wall fan blowing indoor air from main room over central hallway (above hallway ceiling) into small tumbling room.
      b. Space heater mounted near ceiling

D. Notes
   1. Universal Equipment Sales was not in operation during building evaluation.
   2. Probable indoor air communication with Universal and TCS via ceiling/wall interfaces and conduit penetrations from common walls.
   3. Indoor air communication between common hallway and main room.

Time Wise Cleaning, Inc.

A. Layout: 4 Rooms - storage and office space (900 sq. ft)
   1. Common door between TCS Industries and Time Wise Cleaning
   2. Time Wise Cleaning shares common concrete block walls with TCS Industries

B. Rooms
   1. Flooring: Linoleum
   2. HVAC: Baseboard heaters, space heater, air conditioning unit in wall
   3. Pressure: Door to TCS positive relative to TCS Industries
   4. Chemical Inventory: Cleaning supplies, disinfectants (chlorides), toilet bowl cleaners, hydrogen peroxide

C. Notes
   1. Probable indoor air communication with TCS Industries through common door.
   2. Time Wise Cleaning shares common concrete block walls with TCS Industries.
   3. Drop ceiling – blank to deck

EZ Movers

A. Layout: Offices, large storage area (6,800 sq. ft), loading dock, large overhead doors
   1. Common brick walls with Bright Raven Gymnastics

B. Storage Area
   1. Flooring: concrete slab
   2. HVAC: Space heater
   3. Pressure: Positive relative to loading docks in storage area.
   4. Chemical Inventory: HD grease, motor oil, gasoline, mineral spirits, paints, adhesives, hydraulic oil, gear oil

C. Office Area
   1. Flooring: Linoleum tile in offices
   2. HVAC: Roof top unit
   3. Pressure: Positive to outdoors
   4. Chemical Inventory: household cleaners, paint stripper, paint

Universal Equipment Sales

A. Layout: Offices, production floor (11,000 sq. ft combined office and production floor), large storage area (6,000 sq. ft), and large overhead doors.
   1. Office shares common wall with production floor and storage area.
   2. Production floor shares common wall with common hallway and Bright Raven Gymnastics
   3. Storage room shares common wall with TCS Industries

B. Production Floor
   1. Flooring: Concrete slab, 2 floor drains
   2. HVAC: Separate HVAC system above the office space (internal to building) with some heat to production floor.
   3. Pressure
      a. Negative relative to the outdoors
      b. Positive relative to common hallway
   4. Chemical Inventory: Paints, cleaners, large quantities of adhesives & glues (contain methylene chloride), chlorinated degreaser, lubricants, oils
   5. Notes:
      a. Dust collection system exhausts indoors
      b. Air compressor
      c. Conduit clearly penetrating wall common to Bright Raven and not sealed against the wall.
      d. Ceiling blank to deck
      e. Probable indoor air communication with Bright Raven at wall/ceiling interface

C. Storage Area
   1. Flooring: Concrete slab
   2. HVAC
      a. Space heaters
      b. Abandoned large duct system open to outdoors communicates outdoor air and indoor.
   3. Pressure: Neutral pressure relative to outdoors

D. Notes:
   1. Universal Equipment Sales was not in operation during building evaluation.
   2. Universal indoor air vents to common hallway shared with Bright Raven Gymnastics.

ACS

A. Layout: Offices space (6940 sq. ft)
B. Office
   1. Flooring: Linoleum tile
   2. HVAC: Separate HVAC system (roof top units)
   3. Pressure: Negative pressure relative to outdoors
   4. Chemical Inventory: No chemicals observed
C. Notes
   1. Multiple computer entry stations
   2. Computer server room with ventilation

TCS Industries, Inc.

A. Layout: Office space, storage, production floor, loading docks (65,000 sq. ft)
B. Production Floor
   1. Flooring: concrete slab, cracks in slab, sump pits in back of space.
   2. HVAC
      a. Space heaters
      b. Ventilation system in recently acquired production floor space (previously vacant 5,000 sq. ft) for dust processing (between Lockwood Precision Manufacturing and Bright Raven Gymnastics)
      c. Ventilation system in north section of space with side wall fans
      d. Paint booth installed in eastern section of space. Not yet in operation.
   3. Pressure: Negative relative to outdoors throughout TCS space.

4. Chemical Inventory: coolants, WD 40, lubricating and hydraulic oil (large quantities in open containers), acetone parts washer, alcohol based degreasers, urethane, ketones, alcohols, paint cleaner, acids, lubricating oil with chlorinated paraffins, mineral spirits

C. Notes:
   1. Negative pressure without paint booth operating
   2. Conduits observed penetrating (not sealed) the concrete block walls common with adjacent spaces
   3. Moderate oil odor throughout

Premium Armored Services

A. Layout: Office space, vault, indoor loading area, large overhead door (6,000 sq. ft)
B. Production Floor
   1. Flooring: Blank concrete slab, cracks in slab, floor drain, and trench drain.
   2. HVAC
      a. Space heater in the indoor loading area
      b. Furnace room for office space
      c. Abandoned roof ducts
   3. Chemical Inventory: oils, glass cleaner, and degreaser (containing tetrachloroethene).
C. Notes
   1. Armored transport vehicles are parked in the indoor loading area.
   2. A trench drain along the northern wall of the indoor loading area contained water. Employee at Premium Armored Services stated that the trench used to fill up with blue-green oily material when TCS Industries was in operation. He would plug in a sump pump, which would pump the material to a pipe. The destination of the pipe is unclear. He also stated that he notified TCS Industries about the issue and the blue-green oily material no longer filled the trench.

Downey Goodlein

A. Layout: Office space, loading dock, and storage in back (3,000 sq. ft)
B. Office
   1. Flooring: Carpeted
   2. HVAC: Separate HVAC system, rooftop unit
C. Back Storage
   1. Flooring: Concrete slab, floor grates
   2. HVAC
      a. Space heater
      b. Outside wall louvers
      c. Side-wall stack blanked off according to employee
   3. Chemical Inventory: oils, paints, water proofing, cleaning compound, caulk, xylene, cleaners, adhesives, and mineral oil.
   4. Pressure: Negative relative to the outdoors
D. Notes
   1. Chemicals were observed stored in chemical fire cabinets and on racks.

Lockwood Precision Manufacturing

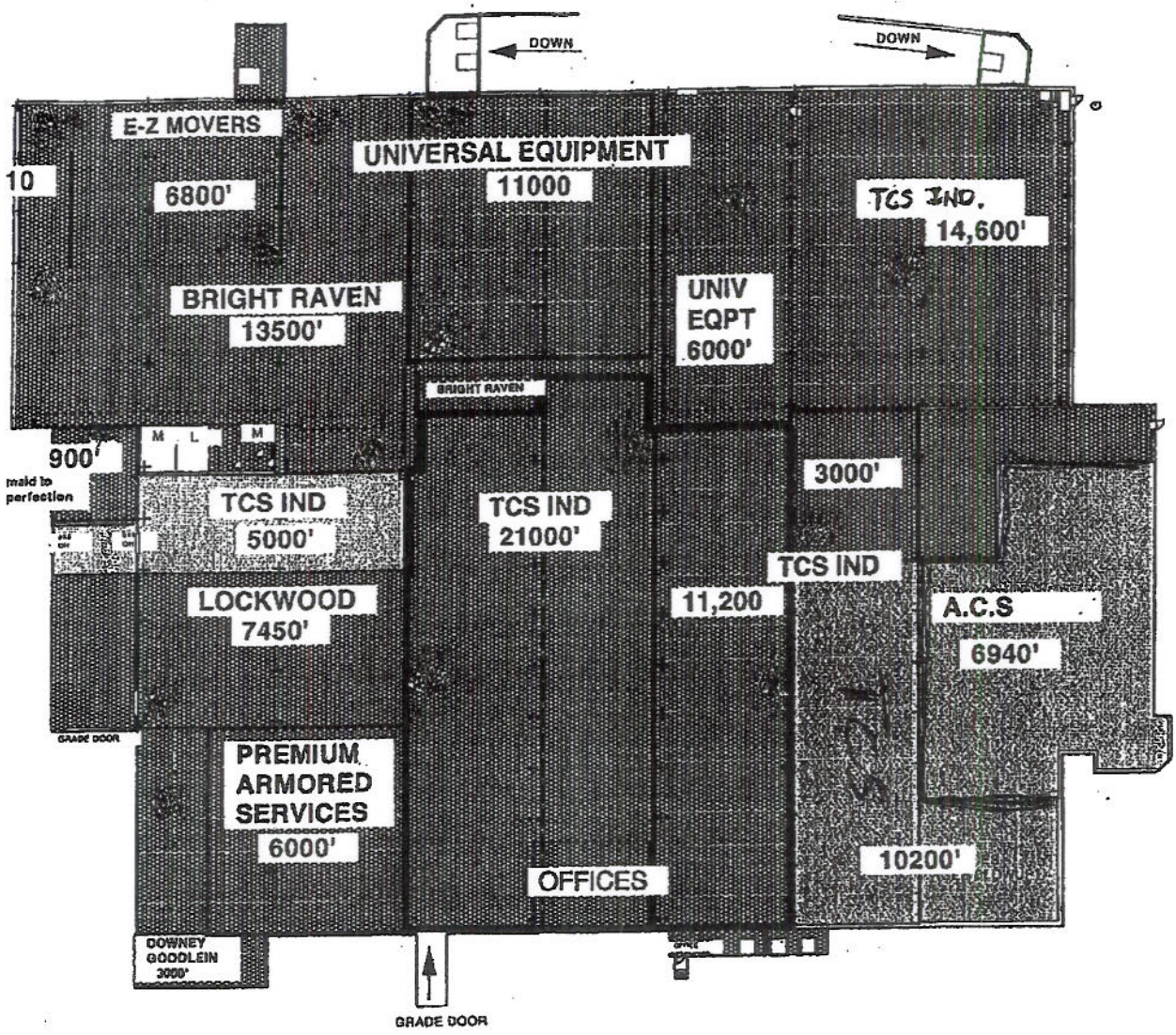
A. Layout: Office space, production floor, loading dock, large sliding door (7,450 sq. ft)
B. Production Floor
   1. Flooring: concrete slab, linoleum tile (poor shape), slick with oil
   2. HVAC
      a. No heating for tenant besides small space heaters

b. No air conditioning
c. Abandoned duct system through roof

3. Chemical Inventory: oils, mineral spirits (Stoddard solvent)

C. Notes

1. Oil compressor functioning
2. Oil covering entire floor
3. Very poor house keeping, strong oil odor



12 PIXLEY INDUSTRIAL PARKWAY
ROCHESTER, N.Y. 14624

SCALE: 1"=60'

EXHIBIT "A"