

March 22, 2019

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

> RE: Former ITT Rochester Form Machine Facility, Town of Gates, New York, Monroe County, Site #8-28-112 Emerging Contaminants Sampling Work Plan

FILE: 3356/73385

Dear Frank

This letter presents ITT LLC's (ITT's) proposed Emerging Contaminants Sampling Work Plan for the Former ITT Rochester Form Machine Facility Site (Site #8-28-112) as requested in a December 13, 2018 letter from the New York State Department of Environmental Conservation (NYSDEC).

SCOPE OF WORK

At the request of NYSDEC, ITT will conduct per- and polyfluoroalkyl substances (PFAS) sampling and analysis during its 2019 groundwater sampling event, although ITT has no knowledge of past use of PFAS at the former RFM Site. The PFAS sampling will be conducted concurrently with a sampling event for volatile organic compounds (VOCs) and 1,4-dioxane as requested by NYSDEC in a letter dated January 30, 2019; however, ITT intends to have separate chains of custody, analytical laboratory reports, and result reporting letters for the VOC/1,4-dioxane and PFAS sampling. This sampling event is scheduled for July 2019 and NYSDEC will be notified of the exact date of sampling 10 business days in advance. It should be noted that if cumulative rainfall of greater than 0.1-inches over 1 or more days occurs within 5 days of the scheduled sampling event, sampling will be rescheduled for 5-days or more after the rain event to avoid interference from the recharge wells in use at the Former AMSF Site.

ITT proposes to collect PFAS groundwater samples from the following wells, ITT-SBW-4, ITT-SBW-2, ITT-IBW-20 (**Figure 1**). Wells ITT-SBW-2 and ITT-IBW-20 are located adjacent to the 1999 RFM Soil Remediation Area (**Figure 1**) and historically contained elevated chlorinated VOC (CVOC) concentrations. Monitoring well ITT-SBW-4 is located along the southern property boundary and represents an upgradient well.

Consistent with NYSDEC-provided guidance document *Groundwater Sampling for Emerging Contaminants* dated April 2018, laboratory analysis for PFAS will be completed by modified USEPA Method 537 with quantification of 21 compounds.

Quality control (QC) samples will also be collected as outlined in the second NYSDEC-provided guidance document *Collection of Groundwater Samples for Perfluorooctanoic Acid (PFOA) and Perfluorinated Compounds (PFCs) from Monitoring Wells Sample Protocol* dated June 29, 2016, as further detailed below.

A letter report summarizing the PFAS sampling and analyses will be submitted to NYSDEC 2 weeks after receipt of the Data Usability Summary Report (DUSR).







GROUNDWATER SAMPLING

PFAS free submersible pumps and tubing will be used during the sampling and wells will be purged and sampled consistent with low-flow sampling techniques following protocols presented in Appendix D of the RI/FS Work Plan prepared by OBG (O'Brien & Gere Engineers, Inc.) with additional considerations for PFAS sampling as identified in the PFAS guidance.

SAMPLE COLLECTION AND HANDLING

Each groundwater sample will be collected directly from tubing into laboratory-provided bottleware. Polypropylene or high-density polyethylene (HDPE), Teflon®-free, bottles will be used to collect the PFAS samples. Samples will be collected as outlined in the NYSDEC provided guidance documents.

Once filled and labeled, each water sample bottle will be immediately placed into a cooler containing regular ice and shipped to ALS Environmental in Kelso, WA (Lab 12060), a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) certified laboratory, under proper chain-of-custody procedures, for analysis.

QUALITY CONTROL SAMPLES

The following QC samples will be collected specifically for the PFAS sampling during the sampling event as outlined in *Collection of Groundwater Samples for Perfluorooctanoic Acid (PFOA) and Perfluorinated Compounds (PFCs) from Monitoring Wells Sample Protocol* dated June 29, 2016.

- One equipment blank
- One field duplicate
- One matrix spike/matrix spike duplicate (MS/MSD)

LABORATORY ANALYSES

PFAS samples and associated QC samples will be analyzed by USEPA Method 537 (modified) with a reporting limit equal to or below 2 parts per trillion (ppt) for PFAS and PFOA.

A standard turnaround time will be requested, with analytical results available within approximately 20 business days from sample receipt by the laboratory. A New York State Analytical Services Program (ASP) Category B analytical data deliverable will be obtained from the laboratory and data validation will be conducted. An EQuIS™ 4-file electronic data deliverable (EDD) will also be obtained for submittal to NYSDEC.

REPORTING

Following receipt of the complete analytical data package and DUSR, a letter report will be prepared for submittal to NYSDEC presenting the PFAS results. This letter report will document the sampling activities, provide the completed field forms and field measurements, and summarize the results of the analyses. The complete analytical data packages and the DUSR will be provided in appendices to the report.

IMPLEMENTATION SCHEDULE

As stated above, it is anticipated that the sampling will be conducted during July 2019 (exact date to be determined). OBG will provide NYSDEC 10 business days' notice prior to sampling. The letter report will follow within 2 months of sampling.



If you have any questions, please contact Lisa Hall of ITT at (949) 562-7402.

Very truly yours,

O'BRIEN & GERE ENGINEERS, INC.

Douglas M. Crawford, P.E.

Daugles M. Crany L.

Vice President

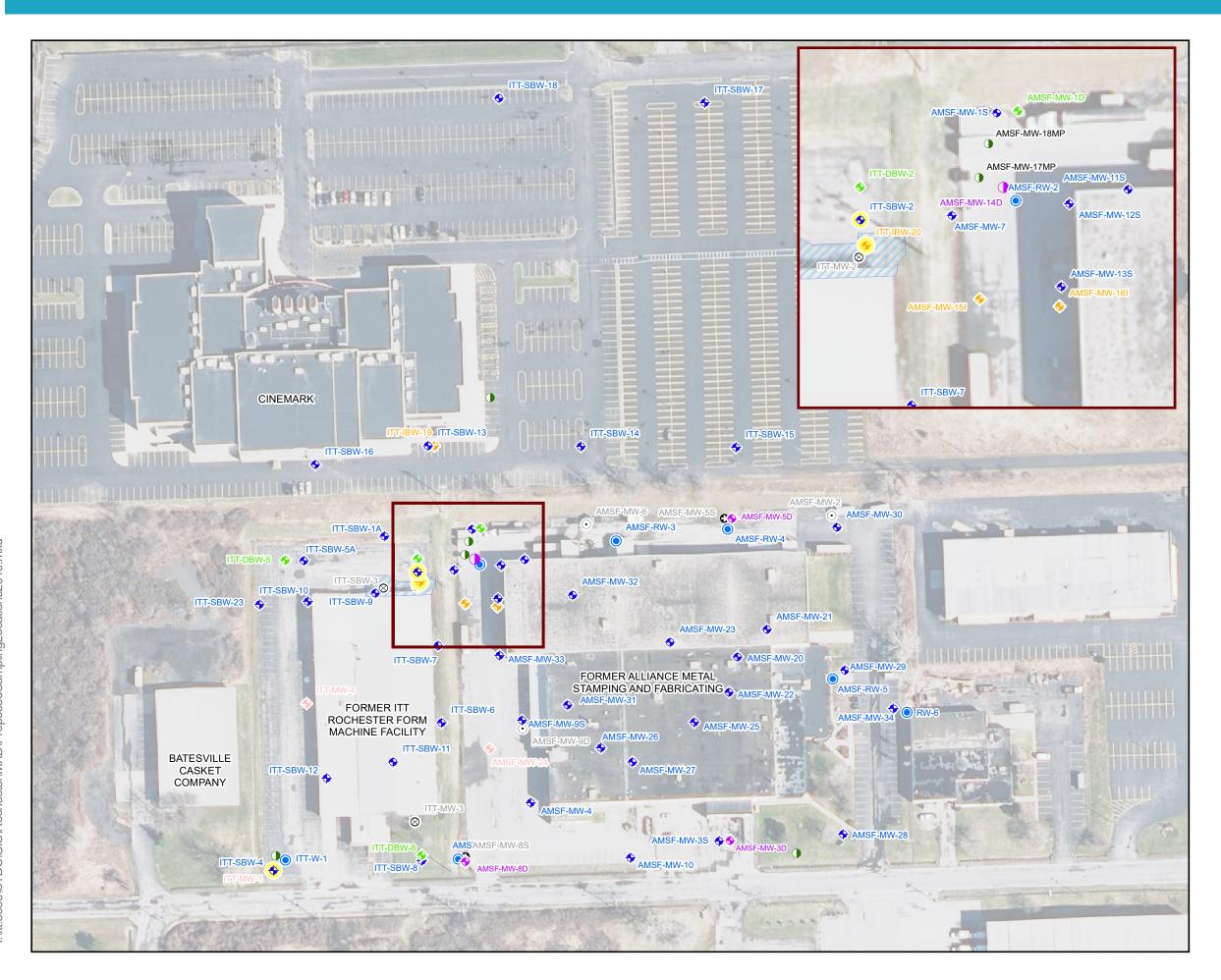
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cc: Lisa Hall & Jeff Stanek – ITT

Michael Peters - The West Firm, PLLC

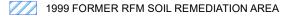
Guy Swenson – OBG Scott Tucker – OBG







- RI PHASE I ABANDONED DEEP BORING
- OTHER DEEP BEDROCK WELL
- ABANDONED MULTIPORT BEDROCK BORING
- OVERBURDEN MONITORING WELL
- UPPER ERAMOSA DOLOMITE WELL
- LOWER ERAMOSA DOLOMITE WELL
- UPPER PENFIELD FORMATION WELL
- RECHARGE WELL
- PRE-RI MISSING WELL
- PRE-RI DAMAGED WELL

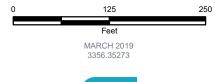


NOTE:

HIGHLIGHTED SAMPLING LOCATIONS REPRESENT PROPOSED SAMPLING LOCATIONS

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

PROPOSED SAMPLING LOCATIONS





O'BRIEN & GERE ENGINEERS, INC.