



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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IDEM Office of Land Quality - Fileroom Stamp	
Governor/Project Name:	6971010 ITT Aerospace
VRPA:	6971010
File Code:	400
Commissioner:	Lori F. Kaplan
Subject:	Remediation Work Plan Comment Letter
Confidential?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Deliberative?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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December 19, 2003

Mr. Dave Koepper
ITT Aerospace/Communications
1919 West Cook Road
Fort Wayne, Indiana 46801-3700

Re: Soil Remediation Work Plan
ITT Aerospace/Communication Div.
Pontiac Street Facility
Fort Wayne, Indiana

Dear Mr. Koepper:

IDEM has completed review of the *Soil Remediation Work Plan* received in this office May 22, 2003 for the ITT Aerospace/Communication Division, Pontiac Street Facility, in Fort Wayne, Indiana. Following the document review and an evaluation of current site conditions, IDEM has concluded that closure, as proposed, does not appear to be an appropriate option at this time.

Although many comments were generated during the work plan review, given IDEM's fundamental concerns about the proposed remedy for the site, it isn't clear that detailed comments and responses are appropriate or necessary. Rather, IDEM is providing the general comments listed below, and recommends that a meeting take place between IDEM, ITT, and their consultants to discuss development of a remedial approach that is acceptable given current site conditions. If detailed comments on the submitted Remediation Work Plan are deemed appropriate following that discussion, a separate letter will be issued at a later date.

General Comments

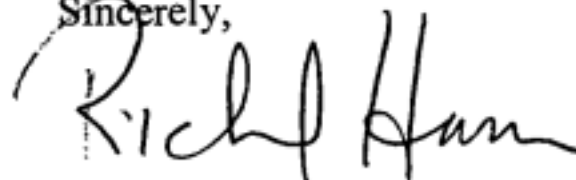
- IDEM recognizes that the remediation system installed and operated by ITT at the former Aerospace/Communication facility has removed a significant amount of contamination from both soil and groundwater. IDEM also recognizes the significant investment by ITT, both in terms of time and money, directed toward achieving site cleanup goals. However, the existence of consistently high VOC concentrations in groundwater, and continued mass VOC removal by the pump and treat system (over 375 pounds from March-June, 2003) appear to indicate the existence an ongoing source that may be leaching to groundwater.
- In the groundwater Remediation Work Plan approved by IDEM in April 1999, ITT proposed to operate a previously installed active treatment system "until soil remediation has been completed and concentrations of VOCs in ground water have been reduced to Tier II non-

residential levels." (Section 6.4.1, *Remediation Work Plan, Ground Water Contamination, ITT Aesospace/Communication Division, Fort Wayne, Indiana, VRP site #6961207, October 29, 1998*). IDEM approved that workplan based on the assumption that active remediation would reduce site impacts to default health protective levels. ITT's current proposal to leave impacted soil and groundwater in place, and to demonstrate that no human exposure exists through a limited groundwater monitoring plan is a significant departure from the previously approved workplan. It is not clear that the existing monitoring well network, or ITT's limited monitoring plan provide a high enough level of confidence to allow for closure considering the soil and groundwater impacts recently observed at the site.

- There are several areas of the risk assessment that do not seem appropriate based on the information currently available. For example, SPLP is used in a way that is not consistent with normal IDEM procedures. Also, the risk-generated alternative cleanup levels for TCE were based on a dilution and attenuation factor that is far higher than what seems appropriate for the site.
- The media for which ITT is requesting closure isn't clear in the RWP. The first paragraph of the executive summary states that "ITT desires that the IDEM issue a COC and CNTS for volatile organic compounds (VOCs) in surface and subsurface soil." However, in the last paragraph of the executive summary and in Appendix G, the risk assessment portion of the document, groundwater is also included as a media for which closure is requested. ITT has made application to the VRP for two separate projects at this facility. Under project #6961207, application was made in December 1996 to address groundwater. In October 1997, a separate application was submitted to address subsurface soil under project #6971010.

As stated above, IDEM anticipates that the proposed meeting with ITT and their consultant will assist in developing an appropriate remedial approach for the Pontiac Street facility.

Sincerely,



Richard Harris, Project Manager
Voluntary Remediation Program

Cc: Bob Aten, Earth Tech
Bill Hayes, IDEM

