From: anthony.carmeli@L3Harris.com <anthony.carmeli@L3Harris.com>
Sent: Friday, June 7, 2024 3:04 PM
To: O'Brien, Debra L <DObrien@idem.IN.gov>
Cc: Bryan, Jeffrey <jeffrey.bryan@aecom.com>; Cisneros.Jose@epa.gov; Robinson, Bill <BROBINSO@idem.IN.gov>; Surfus, Jeff <JSurfus@idem.IN.gov>; Vince.Ruark@L3Harris.com; STILZ, DON <DSTILZ@idem.IN.gov>; jeffpalermoconstruction@gmail.com
Subject: RE: Former ITT Aerospace

Debra,

Good afternoon and please see the attached Work Plan Further Site Investigation for the Former ITT A/C Division Facility located in Fort Wayne, IN. We welcome your comments on this workplan, look forward to continuing the discussion, and completion of the site characterization as discussed during our March 2024 phone call. Thank you for your attention to this matter and let us know if you require additional information.

Anthony J. Carmeli
Director, Environmental Remediation
CORPORATE EHS/L3HARRIS TECHNOLOGIES
M +1 720.249.7404
L3Harris.com / Anthony.Carmeli@L3Harris.com

Work Plan Further Site Investigation

Former ITT A/C D Facility
3700 East Pontiac Street, Fort Wayne, Indiana

U.S. EPA ID No. IND005420245; VRP Site No. 6971010 and 6961207 IDEM VFC AI No. 660

L3Harris Technologies, Inc.

June 7, 2024

Delivering a better world

Prepared for:

L3Harris Technologies, Inc.
Anthony Carmeli
L3Harris Technologies, Inc.
1025 W. NASA Blvd., MS A-11D
Melbourne, FL 32919

AECOM
101 West Ohio Street, Suite 810
Indianapolis, IN 46204
aecom.com

Table of Contents

Executive Summary 1
1. Background Information 1
2. Objectives 2
3. Sampling and Analysis 2
   3.1 Sample Location 2
   3.2 Soil Boring Installation, Logging, Plugging 2
   3.3 Groundwater Sample Collection 2
   3.4 Equipment Decontamination 3
   3.5 Analytical Methods 3
   3.6 Management of Investigation-Derived Waste 3
4. Data Evaluation and Reporting 3
   4.1 Field and Laboratory Data 3
   4.2 Risk Evaluation Update 3
   4.3 Evaluation of Potential Remedies 3
5. References 3

Figures

Figure 1 Well Location Map

Figure 2 TCE Isoconcentration Map October/November 2019

Figure 3 Proposed Sampling Location Map

Executive Summary

This document was prepared by AECOM Technical Services, Inc. (AECOM) for L3Harris Technologies, Inc. (L3Harris) in partial fulfillment of site characterization, remediation, and closure obligations related to the former ITT A/C Division facility located at 3700 East Pontiac Street, Fort Wayne (Allen County) Indiana. These activities are performed to fulfill obligations to the Voluntary Remediation Program (VRP) and the RCRA Corrective Action Program, both as administered by the Indiana Department of Environmental Management (IDEM).

Information presented herein relates to site characterization and remediation activities completed through 2021 during participation in the VRP, and subsequent communication and requests from IDEM. This document is a Further Site Investigation Work Plan (FSI WP), developed to support additional site characterization as requested by the IDEM RCRA Corrective Action Program. The site is identified by the following.

U.S. EPA Id Number: IND005420245
IDEM VRP Site Numbers: 6971010 and 6961207
IDEM Agency Identification Number: 660

This Further Site Investigation Work Plan (FSI WP) establishes plans and methods for further site investigation to support completion of site characterization, refinement of the exposure risk evaluation, consideration of remedies and closure.

1. Background Information

Site characterization, remediation and risk evaluation efforts completed previously, as well as the history of regulatory status are described in detail in a Remediation Completion Report (RCR) dated December 10, 2021, found in the IDEM Virtual File Cabinet (VFC) as document number 83252572 and 83252578. Descriptions of completed activities in this document are limited to those necessary to support development of the work plan details established herein.

The site is located at 3700 East Pontiac Street, Fort Wayne (Allen County) Indiana. The general site layout and locations of existing monitoring wells are shown in **Figure 1**.

Site characterization, remediation and closure are being conducted in response to past releases of chlorinated volatile organic compounds (cVOCs), primarily trichloroethylene (TCE). A map showing the distribution of TCE in groundwater as of October-November 2019 is shown in **Figure 2**. The RCR presents information addressing the delineation/distribution of dissolved-phase TCE in groundwater on-site and on the adjacent site to the east, identified as 3838 East Pontiac Street, relative to screening levels established in the Remediation Closure Guide (IDEM, 2012, updated through 2021). As described fully in the RCR, conditions related to TCE in groundwater are demonstrated to be stable, and land use restrictions are in place to prohibit withdrawal of groundwater from the site and on the 3838 site, adjacent.

Following its review of the RCR, IDEM issued a letter dated January 25, 2024 (VFC Doc. No. 83588601) requesting additional characterization of these groundwater conditions to satisfy certain RCRA Corrective Action program requirements. This document establishes the scope of work to be completed in response to that request.

2. Objectives

The following are the objectives of this FSI.

- Continue/complete delineation of TCE in groundwater off-site;
- Update the exposure risk evaluation and conceptual site model (CSM) as presented in the RCR;
- Update remedy evaluation and selection as warranted.

This FSI Work Plan defines the following scope of work.

- Advance one (1) direct-push boring to the appropriate depth to reach hydrogeologic Unit B2, if present.
- Collect and analyze one groundwater sample from each saturated unit encountered, if groundwater is present.
- Update exposure risk evaluation and conceptual site model (CSM).
- Prepare FSI Report for submission to IDEM.

3. Sampling and Analysis

Soil boring placement and groundwater sample collection will be completed using direct-push methods in conformance with IDEM Nonrule Policy WASTE-053-NPD-R1. Methods are defined in the following sections.

3.1 Sample Location

One soil boring will be installed at the location shown in **Figure 3**, contingent on acquisition of site access/permission and clearance of local utility lines. The boring will be advanced to a maximum depth of 40 feet below ground surface (ft-bgs) in order to reach the saturated zone identified as hydrogeologic Unit B2, if present.

3.2 Soil Boring Installation, Logging, Plugging

The soil boring will be completed using direct-push methods. Soil cores will be collected on a continuous basis through the entire length of the boring for visual-tactile examination and for head-space screening. The boring will be completed to a depth of approximately 40 ft-bgs. A soil boring log will be prepared. After collection of the groundwater sample (**Section 3.3**), the boring will be backfilled/plugged with bentonite per Section 6.2 of WASTE-053-NPD-R1

3.3 Groundwater Sample Collection

One 'grab' groundwater sample will be collected from each water-bearing zone encountered during placement of the soil boring (if any).

Samples will be stored on ice and will be delivered to an approved off-site laboratory under standard chain-of-custody documentation.

3.4 Equipment Decontamination

Non-disposable equipment coming in contact with environmental media will be decontaminated prior to each use in general conformance with ASTM International Standard Method D5088. Decontamination will be completed using a non-phosphate detergent solution wash and distilled water rinse.

3.5 Analytical Methods

Each groundwater sample collected (if any) will be analyzed for VOCs by US EPA Method 8260 D consistent with previous groundwater monitoring activities on this site/project.

3.6 Management of Investigation-Derived Waste

Investigation derived waste (IDW) will be generated in the forms of soil cuttings, purge water, spent decontamination solutions, and general refuse. IDW will be separated by media, contained in 55-gallon drums, and stored on-site with appropriate non-hazardous waste labeling for subsequent transport and disposal by L3Harris. Disposable sampling equipment will be placed in garbage bags and disposed as general refuse.

4. Data Evaluation and Reporting

4.1 Field and Laboratory Data

Field data and laboratory results (if groundwater sampling and analysis are completed) will be summarized in the boring logs and a data summary table with comparison to applicable criteria. Laboratory results exceeding the criteria used in the RCR will be highlighted for discussion in the text.

4.2 Risk Evaluation Update

The risk evaluation presented in the RCR will be updated using data collected during implementation of this FSI Work Plan (if any). Updates may include refined delineation of the extent of TCE in groundwater and refined evaluation of exposure pathways and associated risks.

4.3 Evaluation of Potential Remedies

If Unit B2 is absent/unsaturated, or if concentrations of cVOCs in groundwater in Unit B2 at the subject location are less than applicable residential screening criteria, then the remedies defined in the RCR will remain unchanged and closure of the site will be requested of IDEM. If cVOCs are present in groundwater in Unit B2 at concentrations exceeding applicable residential screening criteria, then recommendations for additional characterization and/or remedies will be identified and evaluated.

5. References

IDEM, March 2012. Remediation Closure Guide, Office of Land Quality; with screening level updates February 2021.

IDEM, Feb. 2024. Drilling Procedures and Monitoring Well Construction Guidelines, Agency Nonrule Policy Document Waste-053-NPD-R1

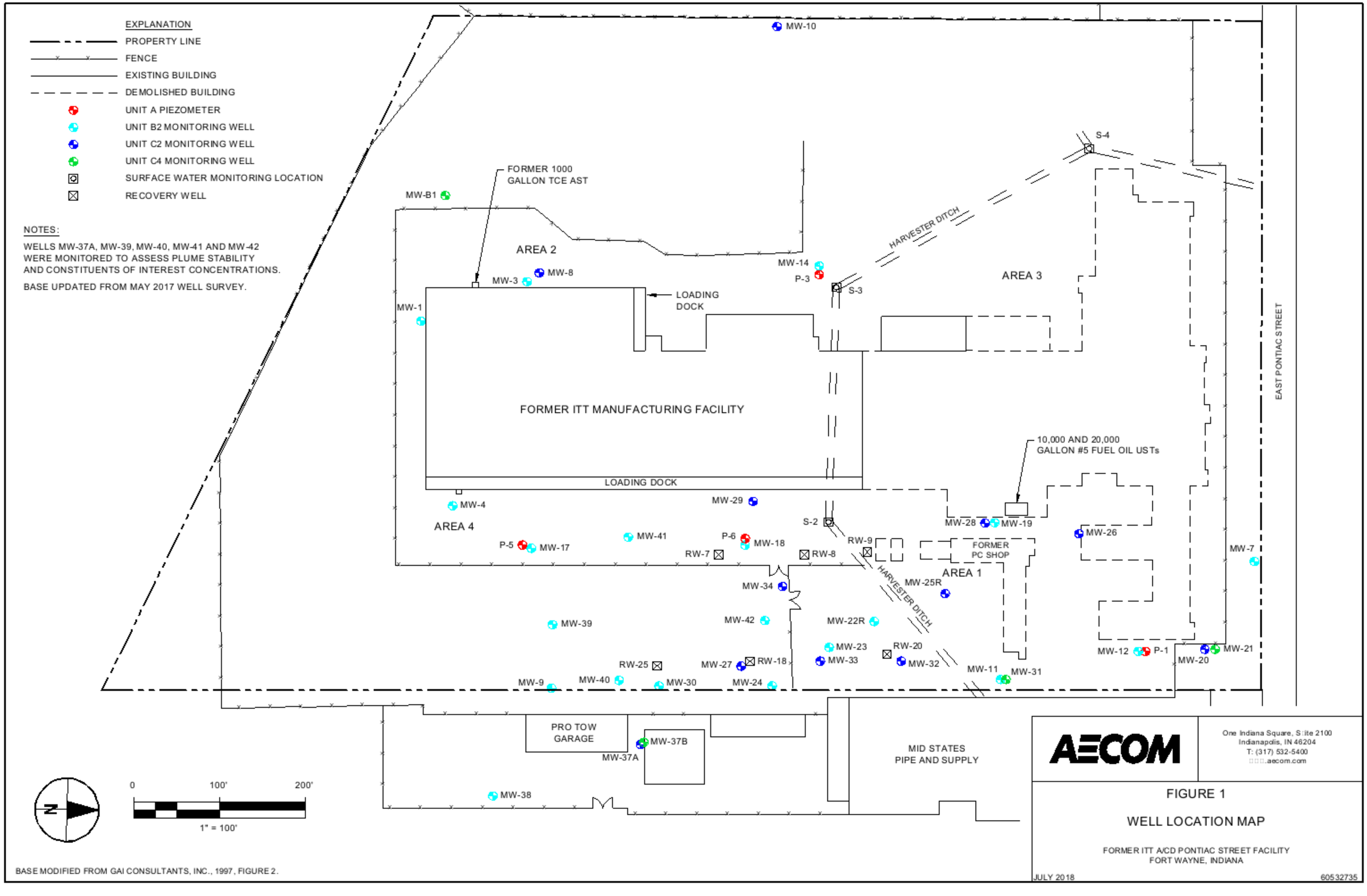
EXPLANATION

- PROPERTY LINE
- FENCE
- EXISTING BUILDING
- DEMOLISHED BUILDING
- UNIT A PIEZOMETER
- UNIT B2 MONITORING WELL
- UNIT C2 MONITORING WELL
- UNIT C4 MONITORING WELL
- SURFACE WATER MONITORING LOCATION
- RECOVERY WELL

NOTES:

WELLS MW-37A, MW-39, MW-40, MW-41 AND MW-42 WERE MONITORED TO ASSESS PLUME STABILITY AND CONSTITUENTS OF INTEREST CONCENTRATIONS.

BASE UPDATED FROM MAY 2017 WELL SURVEY.



BASE MODIFIED FROM GAI CONSULTANTS, INC., 1997, FIGURE 2.

AECOM

One Indiana Square, Suite 2100
Indianapolis, IN 46204
T: (317) 532-5400
www.aecom.com

FIGURE 1

WELL LOCATION MAP

FORMER ITT A/CD PONTIAC STREET FACILITY
FORT WAYNE, INDIANA

JULY 2018

60532735

AECOM

Figure: 2

FORMER ITT MANUFACTURING FACILITY

LOADING DOCK

10,000 AND 20,000
GALLON #5 FUEL OIL USTs

AREA 4

AREA 1

MW-4

MW-29

MW-19
158

MW-28

S-2

P-6

MW-18

MW-41
<5.0

P-5

MW-17

RW-7

RW-8

RW-9

FORMER
PC SHOP

10

100

1000

MW-34

MW-25R

HARVESTER DITCH

MW-22R
19.3

MW-39
<5.0

MW-42
10,100

10,000

MW-23
321

RW-18

RW-20

MW-33

MW-32

RW-25

MW-27

MW-40
1090

MW-30
1530

MW-11

MW-31

MW-9
<5.0

MW-24
<5.0

PRO TOW
GARAGE

MW-37B
<5.0

MW-37A
<5.0

MID STATES
PIPE AND SUPPLY

MW-38
<5.0

N

0 50' 100'

1" = 50'

LEGEND

- PROPERTY LINE
- FENCE
- EXISTING BUILDING
- DEMOLISHED BUILDING
- 100 TCE ISOCONCENTRATION CONTOUR
- 321 TCE CONCENTRATION IN µg/L
- UNIT A PIEZOMETER
- UNIT B2 MONITORING WELL
- UNIT C2 MONITORING WELL
- UNIT C4 MONITORING WELL
- SURFACE WATER MONITORING LOCATION
- RECOVERY WELL

TCE ISOCONCENTRATION MAP
OCTOBER / NOVEMBER 2019

FORMER ITT A/CD PONTIAC STREET FACILITY
FORT WAYNE, INDIANA

Project No.: 60603537 Date: 2020-02-04

Project Management Initials: Designer: NLW Checked: JAD Approved:____ ANSI B 11" x 17"

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AECOM

Figure: 3

PROPOSED SAMPLING LOCATION MAP

FORMER ITT A/CD PONTIAC STREET FACILITY
FORT WAYNE, INDIANA

Project No.: 60719345 Date: 2024-06-04

FORMER ITT MANUFACTURING FACILITY

LOADING DOCK

10,000 AND 20,000
GALLON #5 FUEL OIL USTs

AREA 4

AREA 1

FORMER
PC SHOP

HARVESTER DITCH

PRO TOW
GARAGE

MID STATES
PIPE AND SUPPLY

MW-4
MW-29
MW-28
MW-19
73.6
S-2
P-6
MW-18
MW-41
<5.0
P-5
MW-17
RW-7
RW-8
RW-9
10
100
1000
MW-34
MW-25R
MW-42
9470
MW-22R
253
MW-39
<5.0
MW-23
470
RW-18
RW-20
MW-33
MW-32
RW-25
MW-27
MW-40
3900
MW-30
1590
MW-9
<5.0
MW-11
MW-31
MW-24
8.0
MW-37B
<5.0
MW-37A
<5.0
PROPOSED LOCATION
MW-38
<5.0

LEGEND

- PROPERTY LINE
- FENCE
- EXISTING BUILDING
- DEMOLISHED BUILDING
- 100 TCE ISOCONCENTRATION CONTOUR APRIL-MAY 2021
- 253 TCE CONCENTRATION IN µg/L
- UNIT A PIEZOMETER
- UNIT B2 MONITORING WELL
- UNIT C2 MONITORING WELL
- UNIT C4 MONITORING WELL
- SURFACE WATER MONITORING LOCATION
- RECOVERY WELL

N

0 50' 100'

1" = 50'

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Project Management Initials:
Designer: NLW
Checked: JDB
Approved:
ANSI B 11" x 17"