



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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January 27, 2010

VIA CERTIFIED U.S. MAIL 7000 0600 0026 8552 0166

Mr. Jamieson M. Schiff

Textron, Inc.

40 Westminster Street

Providence, RI 02903

Re: Phase 2 Site Further Investigation  
Work Plan and  
Responses to IDEM Comments for the  
Phase 1 Further Site Investigation  
Textron (Former TORX Facility)  
4366 North Old US Route 31  
Rochester, Fulton County  
State Cleanup Site #7100149

Dear Mr. Schiff:

Staff at the Indiana Department of Environmental Management (IDEM) have evaluated the Phase 2 Further Site Investigation Work Plan (FSI2 WP) submitted by MACTEC in January 2010 and the Responses to IDEM Comments regarding the Further Site Investigation Report also prepared by MACTEC in January 2010 for the former Textron (aka Former TORX Facility) site in Rochester, Indiana. The responses to IDEM comments (IDEM letter dated October 9, 2009) for the first phase of the FSI are adequate and complete. These responses have been incorporated into the FSI2 WP. There are no further comments regarding these. The FSI2 WP was evaluated against the methods and procedures described in the Risk Integrated System of Closure (RISC) Guidance Document, and the quality control criteria found in the Test Methods for Evaluating Solid Waste, Physical/ Chemical Methods (SW846) Third Edition, and its updates. An initial response was made via e-mail to Paul Stork of MACTEC on January 15, 2010. This letter provides formal documentation of the IDEM comments for both submittals.

The site is a fastener manufacturing facility now operating as Accument Global Technologies. The site has been used to manufacture fasteners since the mid-1940s, and industrial use of the property is expected to continue. The site (Site) includes the industrial property and the chemically-impacted areas extending beyond the property boundaries. TCE was reportedly used at the Site from the late 1950s until 1968, and chlorinated compounds have contaminated both soil and ground water. Receptors have been identified as residences to the south and east. Properties that have not been purchased by the RP have been supplied with whole house filters and the water supplies are periodically tested. The work plan addresses completing delineation of the nature and extent of the contamination on-site and off-site to the east, southeast, and south, completing source

investigation on-site, and conducting vapor intrusion investigations at the site facility building and a residence to the south.

### **FSI2 WP COMMENTS**

In the FSI2 WP, MACTEC has proposed the following activities:

- Install a maximum of 38 soil borings in and around the site using direct push, hollow-stem auger, or Rotosonic™ drilling techniques as appropriate for the conditions. This includes evaluation of the concentrations in the source area of the former degreaser within the plant building.
- Define the nature and extent of the contamination to the south and southeast.
- Determination of the effect of seasonal fluctuations of ground water levels on VOC concentrations.
- Evaluation of the area of contamination around the potable well at 4375 N Old US 31.
- Collect soil and ground water samples from the new borings to be analyzed for VOCs and metals.
- Install, develop, measure water levels, and sample monitoring wells as indicated by contamination measured at the new boring locations, including nested wells at each Rotosonic™ boring (B48 through B52).
- Survey locations and elevations of the new soil borings and monitoring wells.
- Conduct quarterly ground water monitoring events.
- Investigate the potential for vapor intrusion (VI) at the residence located at 4163 N. Old U.S. Highway 31, and investigate VI at the TORX facility if supported by the results of the on-site source investigation.
- Abandonment of the potable water well located at 4377 N. Old U.S. Highway 31 in accordance with 312 IAC 13 to prevent the potential for VOCs to migrate into the bedrock.

### **GENERAL COMMENTS**

The work plan proposed activities are appropriate for the scope of the FSI2. In addition, IDEM recommends sampling of the irrigation well, located east of the east pond (in land parcel 008-116010-56), under various pumping/non-pumping conditions to evaluate its potential influence on the contaminant plume.

In general, the described ground water sample collection methods lack needed details such as how long after purging samples are collected, and what water quality parameters are measured to determine stability before sample collection.

The proposed boring location east of MW-34, instead of the suggested location east of MW-31, is acceptable.

## SPECIFIC COMMENTS

Page 15, Section 4.2.1, Paragraph 4: "After development has been completed...for VOCs using EPA Method 8260B." The text should describe the method of sample collection, or how long after development the sample will be collected. The sample collection method utilized should minimize the loss of VOCs.

Page 18, Section 4.2.3, Paragraph 2: "During the over drilling of the outer barrel, water and air are forced through the drill head...and the outer barrel." Soils between the outer and inner barrels may be contaminated. The consultant needs to provide details on how the potentially contaminated "washed away" soils and groundwater are collected and handled.

Section 4.2.4: Most of the sections in the FSI2 WP specifically state whether the samples will be submitted to the on-site laboratory, or to the off-site laboratory, ALS Laboratories of Cincinnati, Ohio. However, section 4.2.4 states simply that the soil samples discussed in this section will be submitted to "the laboratory". Please clarify the laboratory destination. In addition, please note that any samples that will be used to define the nature and extent of contamination must be analyzed by an off-site laboratory and supported by the reporting requirements referenced in Section 5.3

"The amount of water used to drill the interval will be metered and recorded for future groundwater sample collection purposes." This sentence is obscure and lacks details on how the recorded amount of water relates to sample collection. The consultant needs to clarify this sentence.

Page 24, Section 4.5.1, Paragraph 1: "The outdoor air sample location will be based on data collected from a weather station installed at 4377 N. Old U.S. Highway 31." Details on what data from the weather station will be used, and how it will be used to determine the outdoor air sample location should be provided.

Paragraph 2: "MACTEC proposes to simultaneously collect... for a period of 24 hours." The wording of this section is obscure. The consultant should clarify the timeframe in which the individual samples will be collected.

Page 25, Section 4.5.2, Paragraph 1, Bullet 1: "Install one sub-slab... based on the multiplication factor... applicable screening levels." Given the size of the facility and the variability of individual samples, more than one sub-slab sample is recommended. The choice of the sub-slab sample location(s) should take into consideration the multiplication factor by which the VOC concentrations exceed the applicable vapor screening levels.

## CONCLUSION

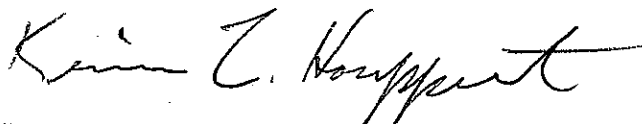
The proposed FSI2 WP is generally adequate and acceptable. IDEM encourages the implementation of it. However, there are clarifications requested for several comments as discussed above. These clarifications do not affect the scope of the work, or require a delay in its implementation. Water sampling of the irrigation well, located in land parcel 008-116010-56, under various pumping/non-pumping conditions is recommended to evaluate its potential effects on the contaminant plume and possible receptors.

Mr. Schiff  
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If you would like to provide feedback on our job performance, please go to [www.in.gov/idem/5681.htm](http://www.in.gov/idem/5681.htm) and complete our "Remediation Program Customer Satisfaction Survey". Your responses are anonymous and we appreciate the feedback on what we are doing well, and what we need to improve.

Please contact IDEM (Kevin Houppert, IDEM State Cleanup Section) at (317) 232-8552, within fourteen (14) days of the date of this letter to notify IDEM that you intend to complete the Investigative Activities for the Site as proposed.

Sincerely,



Kevin L. Houppert, LPG#1408  
State Cleanup Section  
Office of Land Quality

KH/sb

cc: Vickie Poole, OLQ Geological Services (e-mail)  
Jason Murdoch, OLQ Chemistry Section (e-mail)  
Paul Stork, MACTEC,

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