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April 4, 2005

TO: Mr. Russell Hart, RPM
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

FROM: Mr. David Curnock, PM, SECOR International Incorporated

RE: MONTHLY PROGRESS REPORT/MEMORANDUM
Area 9/10 Remedial Design
Southeast Rockford Groundwater Contamination Superfund Site
Rockford, Illinois

Copies: Mr. Thomas Turner, Regional Counsel, USEPA Region V
Mr. Scott Moyer, Hamilton Sundstrand/United Technologies Corporation
Ms. Kathleen McFadden, United Technologies Corporation
Mr. Thomas Williams, PM, IEPA
Mr. Terry Ayers, IEPA

CURRENT MONTH PROJECT ISSUES/STATUS: (*activities, meetings, deliverables, etc.)*
Activities conducted in March 2005 consisted of the continuation of Pre-Design Investigation and initial design activities. Based on January and February meetings/discussions with USEPA, IEPA and SECOR, there are two areas of focus at this time with respect to the Remedial Design activities. These two focus areas consist of the former RCRA Outside Container Storage Area (OSA) and the area beneath the Hamilton Sundstrand Plant #1, up-gradient of the additional monitoring wells installed in the western portion of the South Alley.

The analytical data collected from samples from the OSA during the Pre-Design Investigation and pilot studies has been evaluated and based on this evaluation, the opportunity for potential source mass reduction has presented itself. An internal draft work plan for source mass reduction by the removal of near surface soils has been prepared for ultimate submission to the USEPA and IEPA. The work plan provides an analysis of the data along with the rationale for the effort to be undertaken, as well as the description of the activities. The plan should be submitted within two weeks.

The second area of focus is an area located beneath the HS facility that has been identified as a probable location of potential source material based on down-gradient groundwater monitoring results. With access to the inside of the building being unavailable, alternative means have been explored and evaluated. Such alternatives have included horizontal drilling and angle drilling. Based on the likely location of the potential source material [e.g., former area of underground storage tanks (USTs) located in the central portion of the plant south of the loading dock area], angle drilling to access this area does not appear to be an option. The degree of the angle allowed by traditional angle drilling equipment would not provide reasonable access to the suspected source area.

Horizontal drilling techniques would provide access to the area beneath the building. While being able to access the target area, there are certain limitations presented with this drilling technique. A few of the basic concessions with horizontal drilling are such that 1) discreet soil sampling is not possible, 2) it requires off-set distances that would require access to adjacent property(s) to the south of the Hamilton Sundstrand facility, and 3) it is a costly process. However, it does provide the mechanism for the design of a remedial system utilizing the Record of Decision (ROD) prescribed technologies of soil vapor extraction and enhanced air-sparging for Area 9/10.

As no source area had been defined prior to the performance of the Pre-Design Investigation, pilot testing was performed on the OSA. Based on the location of the potential source area underneath the operating facility building, a second, limited pilot test is being contemplated to address the obvious changes in conditions as compared to the testing performed at the OSA.

FUTURE PROJECT ISSUES/STATUS: *(activities, meetings, deliverables, etc.)*
Future project activities for March 2005 will include continuation of monitoring and evaluation of LNAPL (JP-4) presence and recovery at the eastern end of the South Alley. Alternative contaminant source identification and access means will continue to be evaluated. Horizontal drilling appears to provide the means for information gathering and further design parameter development. Additional discussions both internally and with the USEPA (and IEPA) are anticipated with respect to horizontal drilling and additional pilot testing prior to preparation of any final design. One major topic of these discussions will consider set back distances and off-site access for horizontal drilling. These issues will also be of primary importance for the overall design and constructability of a system. Currently there is a presumption of reasonable access to the off-site property(s). However, the DRB property to the south is for sale which could affect current and future access. Utility clearance (even with horizontal drilling) could also be an issue. Therefore, local utility companies will be contacted to verify locations and approve of the techniques and potential subsurface crossings. There is also the potential when drilling on the property of others that previously unknown contamination may be encountered.

The work plan for source mass reduction (excavation) of near surface soil in the OSA will be submitted to USEPA. Assuming that there are no significant changes to the scope of work, it is anticipated that this effort will be approved for implementation for late spring, early summer 2005.

SAMPLE/TEST DATA SUBMITTALS:
No submittals have been included with this memorandum. However, a work plan for source mass reduction at the OSA will be submitted under separate cover for agency review and approval in approximately two weeks.

RD SCHEDULE UPDATE: (*attach updated schedule as necessary*)
As the activities associated with the Pre-Design Investigation portion of the Remedial Design (RD) continue, the overall schedule continues to be revised. A scope of work concerning the source mass reduction (by excavation) of near surface impacted soils in the OSA will be submitted to the USEPA (and the IEPA) in approximately two weeks. This source mass reduction activity is anticipated to take place in the spring/summer of 2005 based on agency approval.

Access to potential source materials beneath the Hamilton Sundstrand facility building will require the use of horizontal drilling. As mentioned previously, off-site access will be required for implementation of this technique. Access to off-site properties presents a potential performance delay. Hamilton Sundstrand is working on logistical issues commensurate with this drilling application and will continue to work with the USEPA on keeping the RD efforts for Area 9/10 moving forward in a timely and reasonable fashion.

REALIZED/ANTICIPATED PROBLEM CONDITIONS:
None.

PERSONNEL CHANGES:
None.