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VIA EMAIL
Emily Youcha
Environmental Specialist
State of Alaska
Division of Spill Prevention and Response
Contaminated Sites Program
610 University Avenue
Fairbanks, AK 99709

Re: Reply to PRP notice and Request for Information
Camp Lonely Landfill

Dear Emily:

This letter is the reply to your March 18, 2005 letter. Thank you again for granting a further extension of time for ITT Industries, Inc. to reply to your inquiry. These responses are based upon currently available information to ITT Industries, Inc. which reserves the right to supplement these responses when and if more information becomes available. Responses below are provided in good faith, upon information and belief, based upon interviews with individuals with personal knowledge of these matters, and persons who have searched for information and documents relevant to the site: Camp Lonely Landfill.

1. Provide name and company affiliation of the person answering the questionnaire.

Fern Fleischer Daves, Environmental Counsel, ITT Industries, Inc.

2. Provide information on who placed, stored, or disposed of wastes at the Site, the types and volumes of wastes placed, stored, or disposed of at the site, and when these activities occurred.

The following entities were contractors for the U.S. Air Force on the DEW Line:

1. Johnson-Drake-and Piper
2. Puget Sound Bridge and Dredging
3. Western Electric Corp.

4. RCA
5. ITT Arctic Services Inc., also referred to as “ITT ASI”.
6. ITT Federal Electric Corporation, also referred to “ITT FEC”. This entity was renamed ITT Federal Services Corporation in 1990.
7. FELEC Services, Inc., also referred to as “ITT FSI”.

In this document, ITT ASI, ITT FEC, and ITT FSI are collectively referred to as “ITT Alaska.”

Please note that ITT Industries, Inc. (referred to herein as “Respondent”) was incorporated in Indiana in 1995, and was not a contractor for the U.S. Air Force on the DEW Line.

Pursuant to various contracts for operation and maintenance of the DEW Line, ITT Alaska provided operations and maintenance at POW-1 which is approximately 1 mile from the Site. It was the policy and practice of ITT Alaska that wastes generated at DEW Line stations were managed and disposed pursuant to applicable laws and regulations, contract terms, and at the direction and under the close supervision of the U.S. Air Force. Non-hazardous waste generated by ITT Alaska at the POW-1 station was burned and the resulting ash was disposed in a landfill in the immediate vicinity of the POW-1 station. It was not the regular practice of ITT Alaska at POW-1 to place drums of waste in landfills. Hazardous waste generated by ITT Alaska at POW-1 (including waste oil) was routinely transported off-site by sealift. Several individuals who worked at or visited the POW-1 station specifically remember that they did not dispose wastes at the Site which is the subject of your inquiry. While some documents provided by the State of Alaska indicate that the U.S. Air Force had permission to dispose waste at the Site, and that FELEC paid for tests and closure activities at the Site, we have not located any documentation or persons with knowledge that establishes that ITT Alaska actually disposed of wastes at the Site that were generated at the POW-1 station.

3. Provide copies of all studies, reports, and supporting information (including pre-acquisition assessments and work done on behalf of other parties) which you have knowledge of which address past and/or present environmental conditions at the Site. Identify the name, title, address and phone number of the party(s) who is responsible for preparing the studies or information. Information which has been previously submitted need not be submitted again (unless specifically requested in a subsequent communication) if you can provide the name of the office (and name and title of the ADEC representative, if known) to whom the report was provided.

Respondent has no such documents.

4. Provide a description of any ongoing or planned investigations or cleanup work at the Site. Identify the names, titles, and phone number of the individuals responsible for preparing the studies or information.

Respondent has no ongoing or planned activities at the Site.

5. Provide a description of known releases at the Site (date of occurrence, quantity released, substance release, etc.) and a description of corrective measures that were taken. Provide information on any suspected releases, which may have occurred or are occurring.

Respondent has no knowledge about the Site with the exception of information provided on the ADEC website for the Site.

6. Describe the nature of past and present operations at the Site, in particular, any actions that may have caused the release or threat of release at the site.

Persons who visited or worked at POW-1 recall that Husky and an unnamed company that moved "CAT trains" from Camp Lonely to oil exploration sites had operations at the Husky Camp, but they have no information about the Site.

7. Identify persons to whom you leased all or a portion of the property and described the nature of the operations.

Neither ITT Alaska nor Respondent ever owned or leased the Site.

8. Provide a list of persons, and their phone numbers and addresses, who have knowledge about the use, storage or disposal of hazardous materials at the Site.

Respondent has not identified any such persons.

9. Provide other relevant information on the Site history, operations, cleanup work, or agreements that may be applicable to this matter.

Respondent does not have any other relevant information about the Site at this time.

10. Provide information regarding the existence of insurance coverage for damages resulting from releases of hazardous substances and copies of all such insurance policies, both currently in effect and in effect during the periods of activity in question.

Persons who worked on the DEW Line contract for ITT Alaska specifically recall that during the bidding process, the U.S. Air Force declined insurance coverage on the project, and instead indemnified ITT Alaska for all claims related to the DEW Line. We have not yet located the contracts with the U.S. Air Force for the DEW Line, but we have located some documents that refer to the Alternate I ("soft g") FAR Government Property clause 52.245-2 which would provide indemnification to ITT Alaska for any such damages. We await a reply on a Freedom of Information Act request for the DEW Line contracts and related documents.

We will continue to search for relevant documents and supplement this response accordingly.

Sincerely,

Fern Fleischer Daves