Shaw Environmental, Inc.

13 British American Boulevard
Latham, NY 12110-1405
518.783.1996
Fax 518.783.8397

September 5, 2003

Mr. Saibin Endre Mahamooth
Case Manager Division of Environmental Remediation
New York State Department of Environmental Conservation
Region III
21 South Putt Corners Road
New Paltz, New York 12561-1696

Subject: **Sampling Modification Proposal**
Site No. 3-14-101, OOC Index No. W3-0837-98-12
Former Flagship Airlines Hangar Facility
Dutchess County Airport, Wappingers Falls, NY

Dear Mr. Mahamooth:

Shaw Environmental, Inc. (Shaw), on behalf of American Eagle Airlines (AEA), submits the following sampling modification proposal for the Flagship Airlines Hangar Site for your review and approval. This proposal addresses groundwater and soil vapor extraction (SVE(air sampling, pursuant to the Record of Decision (ROD) for the Site.

Proposed Sampling Adjustments-Groundwater

During past conversations between AEA, Shaw and the New York State Department of Environmental Conservation (NYSDEC), sample methodology, wells to be sampled and sample frequency were discussed. The attached table presents the current groundwater sampling requirements for the project. Through the course of the investigation and Interim Remedial Measure (IRM) phases those contaminants associated with the site were identified and confirmed through repeated sampling. The ROD identifies the contaminants of concern (refer to ROD tables 1B and 2 and section 5.1.2).

Based on the current groundwater results Shaw recommends continued sampling of those ten (10) monitoring wells shown on the attached table. These wells will be sampled on a quarterly basis commencing in September 2003. Wells were previously sampled once every four months or three times per year. All of the volatile organics of concern, plus naphthalene are included in the USEPA Method 8260. Shaw proposes to sample and report only those analytes identified in the ROD. The phenols previously detected using the CLP semi-volatile method will be analyzed using USEPA Method 8041. As with the volatiles, only those analytes identified in the ROD, as identified

above, will be sampled and reported. Shaw also proposes the discontinuance of the quality control sampling (duplicates, matrix spikes, matrix spike duplicates, field blanks), with the exception of the volatile trip blank.

Twelve additional wells, plus the septic tank, have been sampled once per year in addition to the ten wells previously discussed. Little or no laboratory detections have been recorded in these twelve wells. These wells are located in areas not affected by the known contamination remaining in the MW-9/MW-10 and A-42S locations. Therefore, we propose discontinuance of sampling at these well locations. Monitoring wells located in, immediately surrounding or down gradient of these areas of concern plan to be monitored using the ten wells shown on the attached table.

Shaw proposes the laboratory provide a level II quality control data package. This will include the individual well location results (form ones), basic lab quality control data backup and a result narrative. Shaw proposes the discontinuance of third party validation.

Proposed Sampling Adjustments-SVE Air Stream

Though the soil vapor extraction (SVE) system was originally designed to operate on two twelve-hour pulsed legs, the system currently operates will all SVE wells on simultaneously. The system flow is within original design parameters. Shaw previously concluded that based on the appropriate flow, it was more advantageous to operate all SVE point simultaneously twenty-four hours a day. Through this period Shaw has manually isolated the legs (A and B) for air sampling purposes

During the pre-ROD or three-year operational period of the system, the SVE influent and effluent air streams have been sampled. During this period monthly photo ionization detector (PID) measurements were collected for each SVE well and following vapor phase carbon treatment. Based on the comprehensive, three-year period of results there have not been significant levels of vapors entering or exiting the treatment system. Therefore, Shaw recommends that monthly PID measurements continue and the quarterly influent and effluent analytical samples be discontinued. Shaw does recommend that the two vapor phase carbons remain on-line.

Shaw, on behalf of AEA, appreciates your consideration of these sampling adjustments. These changes will allow for decreased laboratory analysis time thus quicker report turn around efficiency, discontinuance of third party validation and cost savings associated with the aforementioned.

Please call Alan Angers at (817) 931-2170 or e-mail at alan.angers@aa.com if you have any questions. You may also call the undersigned at (518) 783-1996 or e-mail at brian.neumann@shawgrp.com.

Sincerely,
SHAW ENVIRONMENTAL, INC.

Brian L. Neumann, PG, CPG
Project Manager, Hydrogeologist
Enclosures

cc: Carol A. Bogle, Esq.
Mr. Geraghty, NYSDOH, Troy, NY
Denise D'Ambrosio, Esq.
Dan Eaton
James Johnson, Esq.
Eric Rothenberg, Esq.
Ed Rose

Former Flagship Airlines Hangar Site, Site No. 3-14-101
Proposed Sampling Program to be Initiated with ROD Implementation

	Current/Pre-ROD or IRM Sampling			Proposed Quarterly Sampling
	Sampled	Sampled	Sampled	Sampled
Location	January	May	September	Sept, Dec, March & June
(Groundwater)				
ME-19	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	VOC 8260, 8041 (see below)
MW-6	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	VOC 8260, 8041 (see below)
MW-8	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	VOC 8260, 8041 (see below)
MW-9	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	VOC 8260, 8041 (see below)
MW-10	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	VOC 8260, 8041 (see below)
MW-20	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	VOC 8260, 8041 (see below)
A-26S	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	VOC 8260, 8041 (see below)
A-27S	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	VOC 8260, 8041 (see below)
A-42S	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	VOC 8260, 8041 (see below)
A-43S	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	CLP VOC, CLP SVOC	VOC 8260, 8041 (see below)
ME-12	Not sampled	Not sampled	CLP VOC, CLP SVOC	Not sampled
ME-13	Not sampled	Not sampled	CLP VOC, CLP SVOC	Not sampled
ME-14	Not sampled	Not sampled	CLP VOC, CLP SVOC	Not sampled
ME-15	Not sampled	Not sampled	CLP VOC, CLP SVOC	Not sampled
ME-16	Not sampled	Not sampled	CLP VOC, CLP SVOC	Not sampled
ME-18	Not sampled	Not sampled	CLP VOC, CLP SVOC	Not sampled
MW-1	Not sampled	Not sampled	CLP VOC, CLP SVOC	Not sampled
MW-2	Not sampled	Not sampled	CLP VOC, CLP SVOC	Not sampled
MW-7A	Not sampled	Not sampled	CLP VOC, CLP SVOC	Not sampled
DG-1	Not sampled	Not sampled	CLP VOC, CLP SVOC	Not sampled
Septic Tank	Not sampled	Not sampled	CLP VOC, CLP SVOC	Not sampled
A-8S	Not sampled	Not sampled	CLP VOC, CLP SVOC	Not sampled
A-41S	Not sampled	Not sampled	CLP VOC, CLP SVOC	Not sampled
(Air)				
SVE Influent (leg A)	Method TO-14	Method TO-14	Method TO-14	Not sampled
SVE Influent (leg B)	Method TO-14	Method TO-14	Method TO-14	Not sampled
SVE Effluent (leg A)	Method TO-14	Method TO-14	Method TO-14	Not sampled
SVE Effluent (leg B)	Method TO-14	Method TO-14	Method TO-14	Not sampled
Total SVE Influent	Not applicable	Not applicable	Not applicable	Not sampled
Total SVE Effluent	Not applicable	Not applicable	Not applicable	Not sampled

Notes:

VOC Method 8260 includes all ROD identified contaminants of concern for groundwater. They are as follows:

1,1,1-trichloroethane
tetrachloroethene
1,1-dichloroehane
1,2-dichloroethene
trichloroethene
chlorobenzene
chloroethane
vinyl chloride
naphthalene (included in the VOC 8260 method)

Method 8041 includes all the phenol derivatives. The phenols identified in the ROD are as follows:

phenol
4-methylphenol

Only those contaminant analytes of concern are proposed for sampling and reporting.
Shaw design modification eliminates SVE and Air Sparge legs.