



April 7, 2026

Barbara Firebaugh, P.G.  
Remedial Bureau D  
New York State Department of Environmental Conservation  
Division of Environmental Remediation  
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Albany, NY 12233-7015  
[Barbara.Firebaugh@dec.ny.gov](mailto:Barbara.Firebaugh@dec.ny.gov)

**RE: *Supplemental OU-01 Sediment and Surface Water Sampling  
Saint-Gobain Performance Plastics, McCaffrey Street Site  
14 McCaffrey Street  
Village of Hoosick Falls, Rensselaer County  
DEC Site No.: 442046***

Dear Ms. Firebaugh:

In response to your comment letter dated November 24, 2025 regarding the Revised Baseline Ecological Risk Assessment (BERA) and your comment letter dated March 19, 2026, this letter provides a supplemental scope of work for sediment, surface water, and porewater sampling in the northern portion of the McCaffrey Street Operable Unit 01 (OU-01) area, where deep groundwater has been documented to discharge into the Hoosick River. As also defined in your letter, OU-01 includes the 6.41-acre parcel occupied by 14 McCaffrey Street in Hoosick Falls, NY, as well as soil and groundwater contamination directly attributable to on-site disposal of hazardous waste.

### **Deep Groundwater Discharge to the Hoosick River and Previous Sampling**

As described in Section 4.4.2 of the Draft Remedial Investigation Report (RIR) for McCaffrey Street Site OU-01 (C.T. Male Associates and BEC, 2024), deep groundwater flow within OU-01 is toward a deep transmissive zone that extends from the southern end of the former Village of Hoosick Falls wellfield to the Hoosick River near the Falls Area (Attachment 1 - Deep Groundwater Flow in OU-01). The northern reaches of the deep transmissive zone terminate in an area of preferential groundwater discharge within the Hoosick River. The deep groundwater flow path, deep transmissive zone, and preferential discharge area shown on Attachment 1 are defined by multiple lines of evidence as presented within the Draft OU-01 RIR (C.T. Male Associates and BEC, 2024). Initial investigations of this area for groundwater discharge in 2019 leveraged an infrared camera-equipped drone survey of the Hoosick River. This identified areas of temperature contrasts, which may be indicative of groundwater discharge (ERM, 2022). The areas were further delineated with hand-held infrared cameras from the shoreline and paired sampling of groundwater and surface water in 2020 [Attachment 2 - Results of Paired Groundwater and Surface Water Samples (2020)].

**To:** Ms. Barbara Firebaugh, P.G.  
**From:** C.T. Male Associates and BEC Engineering and Geology, P.C  
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## Proposed Sampling Scope

The objective of the proposed sampling scope is to further characterize per- and poly-fluoroalkyl substances (PFAS) in co-located sediment, surface water, and porewater samples in the preferential deep groundwater discharge area. The proposed scope includes the collection of co-located sediment, surface water, and porewater samples at nine locations to allow calculation of 95% upper confidence limits on the mean concentrations for use in the BERA. The nine proposed sample locations are shown on Attachment 3 (Proposed Sample Locations). These nine locations were chosen based on their locations within the preferential groundwater discharge area. The nine locations include six locations that coincide with samples collected by ERM in 2020, which are identified on Attachments 2 and 3 as "ERM Area 3" through "ERM Area 8", and three additional locations that were chosen to provide additional coverage between the previous ERM sample locations within the preferential groundwater discharge area.

Prior to sampling, field reconnaissance at each of the proposed locations will be conducted in coordination with the New York State Department of Environmental Conservation (NYSDEC) and locations will be flagged prior to sampling. Due to field conditions encountered, sample locations may be moved from the proposed locations shown on Attachment 3 following field reconnaissance and in consultation with the NYSDEC. Efforts will be made to collect the nine surface water samples within a 24-hour period; however, sediment and porewater sampling may be conducted over the course of several days depending on field conditions and river flow conditions. In accordance with NYSDEC's *Technical Guidance for Site Investigation and Remediation* (DER-10), sediment samples will be collected from the 0.0 to 0.5 foot, 0.5 to 1-foot, and 1 to 2 feet intervals where sediment depth allows. To facilitate safe access and safe working conditions during field activities, sampling will be conducted during baseflow<sup>1</sup> conditions which will be pre-determined in coordination with NYSDEC based on precipitation data recorded at the weather station located on the Facility and the nearby river gauge station at Eagle Bridge (USGS-01334500).

Sediment and surface water samples will be collected according to the methods specified in the approved Field Sampling Plan (FSP; C.T. Male Associates and BEC, 2020a). Porewater samples will be collected from temporary well points using methods similar to those used by ERM to collect the 2020 samples, specifically:

- Measure and record the ambient river temperature at each location.
- Collect riverbed temperature measurements within a 5-foot radius of the proposed location using a suitable thermometer and thermocouple probe. Temperature will be recorded for the 0 to 12-inch depth interval at each location, with lower temperatures indicative of groundwater discharge. The location within the 5-foot radius with the lowest temperature will be selected for installation of the temporary well point.

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<sup>1</sup> Baseflow is the condition of a river or stream between precipitation events when its flow is considered to be at a relatively constant level.

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- Install a temporary Solinst 615N (or similar) well point with stainless steel riser pipe to a maximum depth of 3 feet into the riverbed at each location using a slide hammer, or similar handheld device. Measure and record water quality parameters (temperature, conductivity, pH, dissolved oxygen, and turbidity) from the temporary well point and ambient surface water in accordance with the low-flow sampling techniques in the FSP (C.T. Male Associates and BEC, 2020a).
- In the following order, collect (1) a porewater sample from each temporary well point, (2) a surface water sample adjacent to each temporary well point from the midpoint of the water column, and (3) sediment samples adjacent to each temporary well point from the 0.0 to 0.5 foot, 0.5 to 1-foot, and 1 to 2 feet intervals where sediment depth allows.

Surface water and porewater samples will be submitted for laboratory analysis of PFAS, and sediment samples will be submitted for laboratory analysis of PFAS and total organic carbon (TOC). TOC analysis will be conducted in accordance with the most recently approved Quality Assurance Project Plan (QAPP; C.T. Male Associates and BEC, 2020b). For the analysis of PFAS, EPA Method 1633A will be used as requested by the U.S. Environmental Protection Agency and the New York State Department of Environmental Conservation. Analytical data validation will be conducted by an independent data validator in accordance with previously approved methods (C.T. Male Associates, 2016). Analytical results will be provided to NYSDEC in the required Electronic Data Deliverable (EDD) format following data validation.

A data summary report will be submitted to NYSDEC within 60 days of data validation. A detailed evaluation of the data will be included in a revision to the BERA. Upon NYSDEC acceptance of this supplemental scope of work, the work will be scheduled based on the safety considerations described above.

If you have any questions or require any additional information, please contact the undersigned at your convenience.

Respectfully submitted,

C.T. MALE ASSOCIATES



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Brian Angerman, P.E.  
Senior Environmental Engineer

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c: Ian Beilby, P.E., NYSDEC  
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## Attachments

Attachment 1 Deep Groundwater Flow in OU-01  
Attachment 2 Results of Paired Groundwater and Surface Water Samples (2020)  
Attachment 3 Proposed Sample Locations

## References

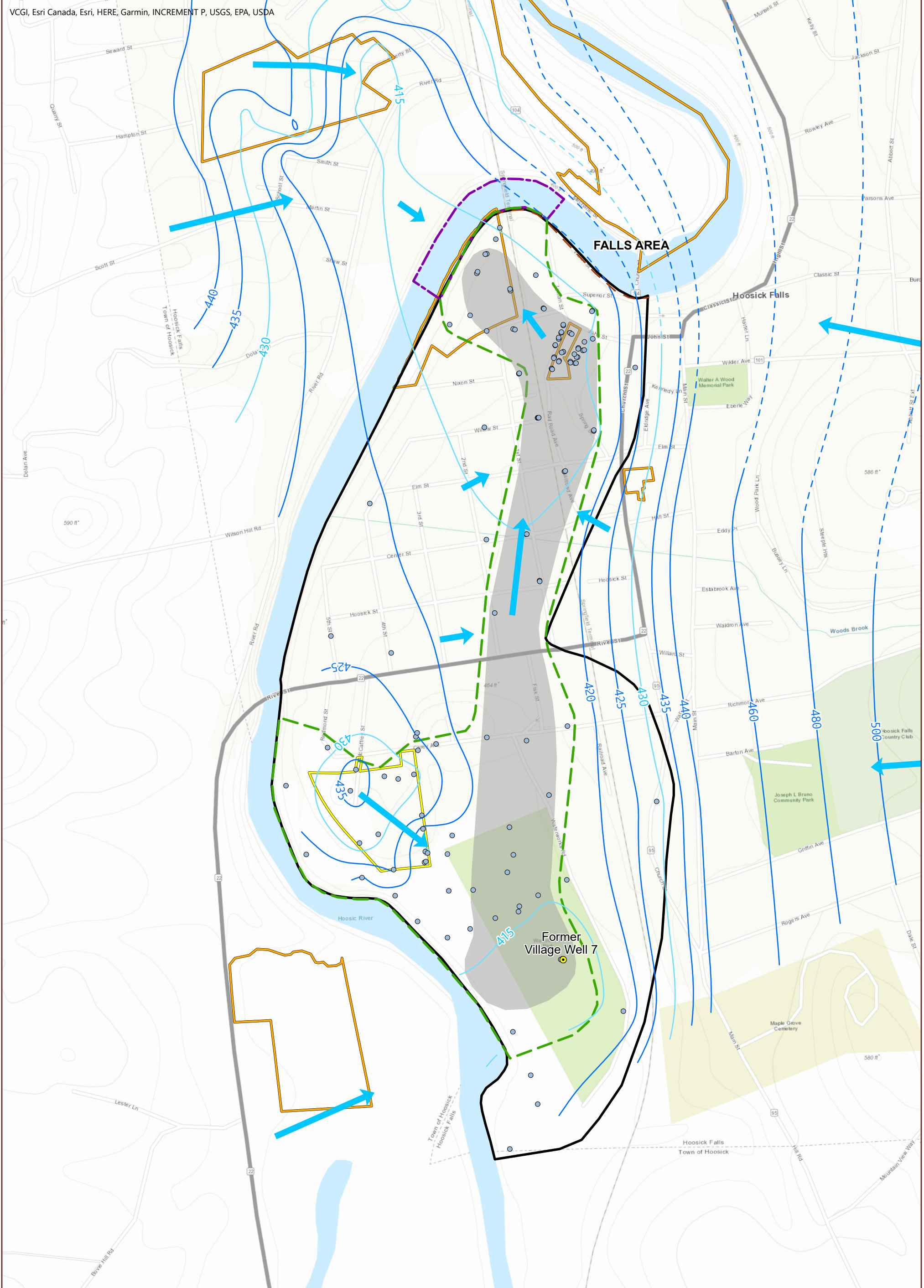
C.T. Male Associates, 2016. Final Remedial Investigation/Feasibility Study Work Plan: Saint-Gobain McCaffrey Street Site. NYSDEC Site No. 442046. 14 McCaffrey Street, Hoosick Falls, Rensselaer County. C.T. Male Associates. Revised August 30, 2016.


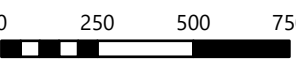
C.T. Male Associates and BEC, 2020a. Field Sampling Plan, 14 McCaffrey Street (Site No. 442046) and 1 Liberty Street (Site No. 442048), Village of Hoosick Falls. March 2020.

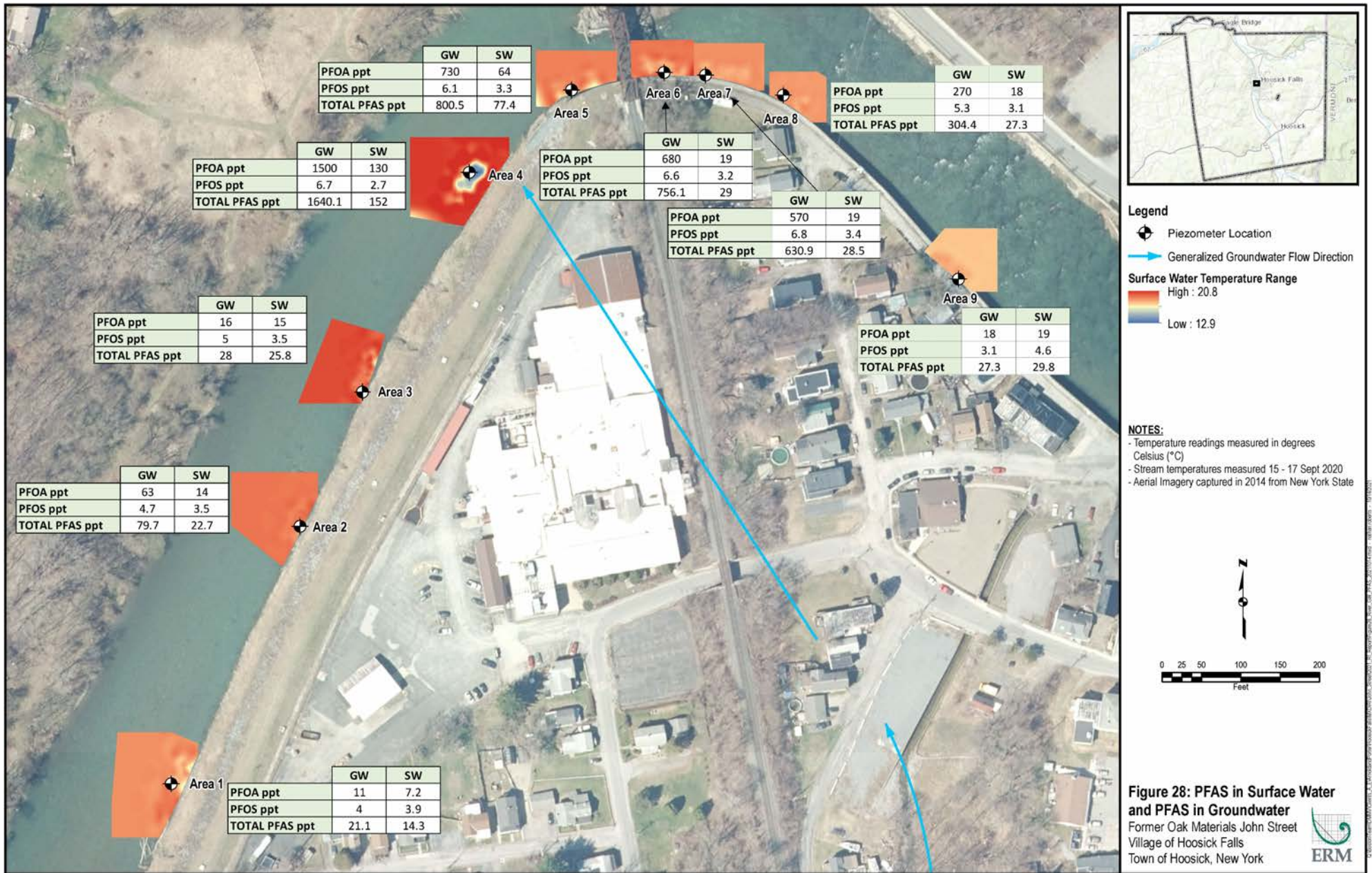
C.T. Male Associates and BEC, 2020b. Quality Assurance Project Plan, 14 McCaffrey Street (Site No. 442046) and 1 Liberty Street (Site No. 442048), Village of Hoosick Falls. March 6, 2020.

C.T. Male Associates and BEC, 2024. Draft Remedial Investigation Report, McCaffrey Street Site Operable Unit 01, Hoosick Falls, New York (NYSDEC Site No. 442046, USEPA ID# NYD004986741). Prepared for Saint-Gobain Performance Plastics, Corp. and Honeywell International Inc., June 2024.

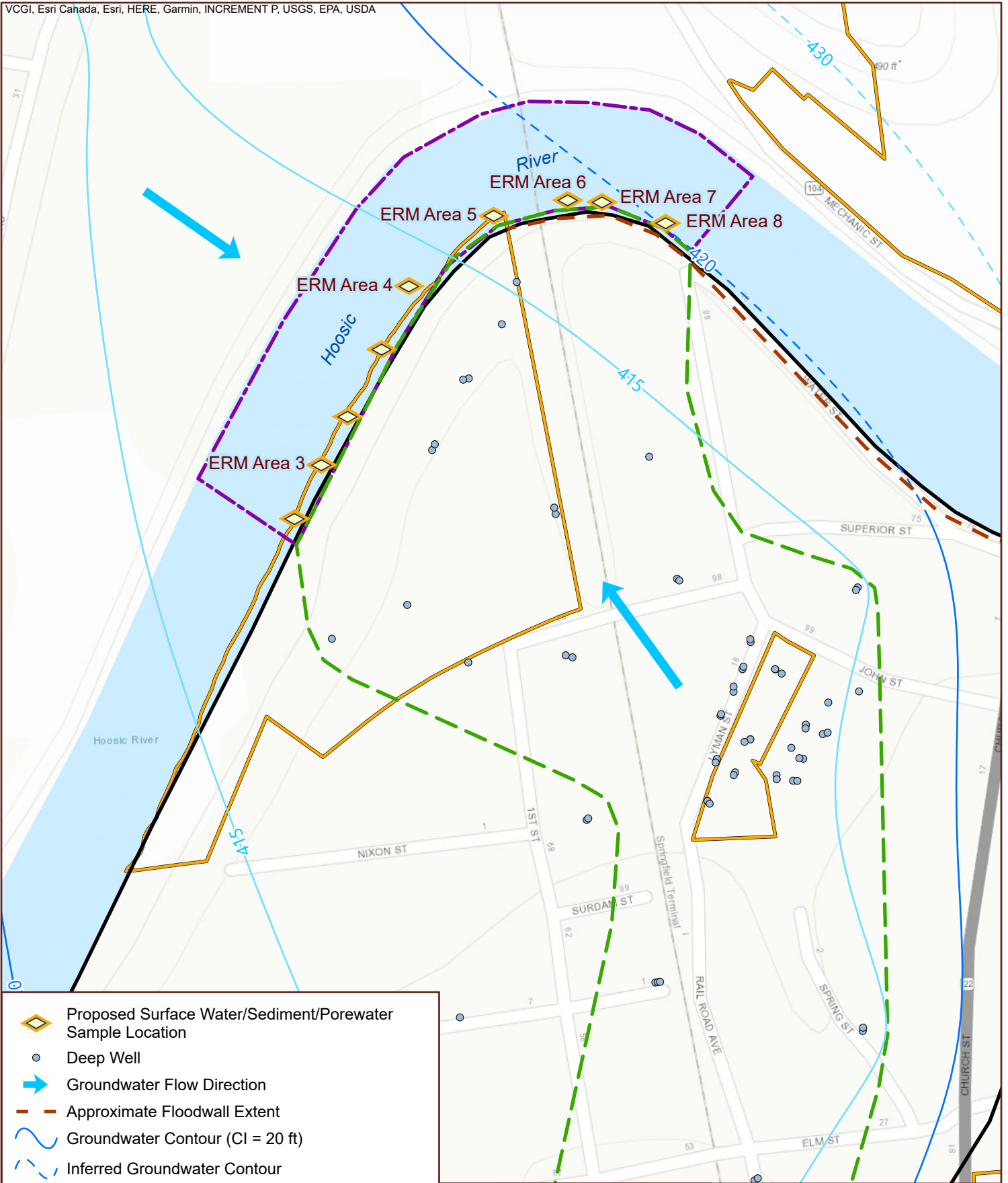
ERM, 2022. Remedial Investigation Report, Former Oak Materials John Street, Hoosick Falls, NY, NYSDEC Site Number 442049. Prepared for Honeywell International Inc. ERM Consulting and Engineering, Inc. June 10, 2022.



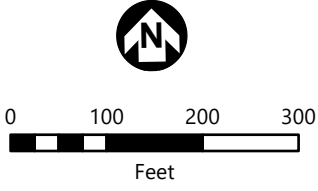
<ul style="list-style-type: none"> <li><span style="color: blue;">●</span> Deep Well</li> <li><span style="color: yellow;">●</span> Former Village Water Supply Well</li> <li><span style="color: blue;">➔</span> Groundwater Flow Direction</li> <li><span style="color: blue;">—</span> Groundwater Contour (CI = 20 ft)</li> <li><span style="color: blue;">- - -</span> Inferred Groundwater Contour</li> <li><span style="color: blue;">- - -</span> Supplemental Groundwater Contour</li> <li><span style="color: blue;">- - -</span> Inferred Supplemental Groundwater Contour</li> <li><span style="color: orange;">- - -</span> Approximate Floodwall Extent</li> </ul>	<ul style="list-style-type: none"> <li><span style="background-color: gray; border: 1px solid gray; display: inline-block; width: 15px; height: 10px;"></span> Approximate Extent of Deep Transmissive Zone</li> <li><span style="border-bottom: 2px dashed green; width: 20px; display: inline-block;"></span> Area along Deep Groundwater Flowpath from Site</li> <li><span style="border-bottom: 2px dashed purple; width: 20px; display: inline-block;"></span> Preferential Groundwater Discharge Area*</li> <li><span style="border: 2px solid yellow; width: 20px; height: 10px; display: inline-block;"></span> Site Boundary</li> <li><span style="border: 2px solid orange; width: 20px; height: 10px; display: inline-block;"></span> Other Sites of Interest</li> <li><span style="border: 2px solid black; width: 20px; height: 10px; display: inline-block;"></span> OU-01 Boundary</li> </ul>	<p>*Based on groundwater and river convergence area as defined in Remedial Investigation Report, Former Oak Materials John Street, Hoosick Falls, NY, NYSDEC Site Number 442049 (ERM, 2022).</p>   <p>0 250 500 750 Feet</p>	<p>ATTACHMENT 1</p> <p><b>DEEP GROUNDWATER FLOW IN OU-01</b></p> <p>McCaffrey Street Site OU-01 Hoosick Falls, NY</p>
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Attachment 2  
Results of Paired Groundwater and  
Surface Water Samples (2020)



- Proposed Surface Water/Sediment/Porewater Sample Location
- Deep Well
- Groundwater Flow Direction
- Approximate Floodwall Extent
- Groundwater Contour (CI = 20 ft)
- Inferred Groundwater Contour
- Supplemental Groundwater Contour
- Inferred Supplemental Groundwater Contour
- Area along Deep Groundwater Flowpath from Site
- Preferential Groundwater Discharge Area
- OU-01 Boundary
- Other Sites of Interest



ATTACHMENT 3  
**PROPOSED  
 SAMPLE LOCATIONS**  
 McCaffrey Street Site OU-01  
 Hoosick Falls, NY