

August 13, 2025

Ms. Caroline Jalanti
Project Manager
Division of Environmental Remediation
Remedial Bureau C, Section B
New York State Department of Environmental Conservation
625 Broadway, 12th Floor
Albany, NY 12233

**Re: 2025 Groundwater Sampling and Riverbank Reconnaissance
Malone (Amsden Street) Manufactured Gas Plant Site
NYSDEC Site No. 517014**

Dear Ms. Jalanti:

This letter provides the proposed scope for collecting a round of groundwater samples and conducting riverbank reconnaissance activities at National Grid's former manufactured gas plant (MGP) site located at 25 Amsden Street in the Village of Malone, Franklin County, New York (hereinafter, the "Site"). As discussed during our June 5, 2025 Teams call, the purpose of groundwater sampling and riverbank reconnaissance is to confirm that conditions have not significantly changed from the events conducted prior to preparing the Alternatives Analysis Report (AAR). The previous round of groundwater sampling was conducted in January 2022 and the previous riverbank reconnaissance was conducted in October 2022.

Groundwater Sampling

National Grid will evaluate and document the integrity of each monitoring well prior to sampling. The integrity assessment will consist of the following steps:

- Check for the presence of an identifying label on the well. If absent, label the well casing.
- Examine the surface condition to confirm the surface protective casing or flush mount is competent, the inner casing is not broken or chipped, and the concrete surface seal is intact.
- Open the well and check for the presence of a lock and well cap.
- Check for the presence of a measuring point demarcation. If not present, add a marking to the highest point of the inner casing.

- Measure and notate the depth to water, total well depth, and any non-aqueous phase liquid thickness. Assess the feel of the well bottom (i.e., soft due to sediment or hard). Compare the measured well dimensions to those measured at the time of installation.
- Perform any recommended maintenance activities that can be performed using available tools. If activities cannot be performed at the time of sampling, they can be conducted during a separate mobilization. These could include well development and repairs to the surface completion.

National Grid proposes to collect a groundwater sample from each of the 11 Site monitoring wells (MW-1R, MW-2, MW-3, MW-4, MW-5, MW-5R, MW-6, MW-7, MW-8R, MW-9R, and MW-10). The locations of the monitoring wells are shown in Attachment 1, which contains Figure 1 from National Grid's letter dated April 19, 2022, presenting the January 2022 Groundwater Sampling Results. Note that monitoring well MW-5 has been dry during all previous sampling rounds, and as such, may not contain groundwater during the impending sampling round.

Consistent with the previous sampling rounds, groundwater samples will be collected from monitoring wells using low-flow sampling techniques, and samples will be analyzed for Target Compound List (TCL) volatile organic compounds (VOCs), TCL semi-VOCs (SVOCs), and total cyanide. National Grid is also planning to collect a groundwater seep sample (SEEP-1) from the seep located along the toe of the slope in the northeast portion of the Site (i.e., in the approximate same location as previously collected seep samples). The seep sample will also be analyzed for TCL VOCs, TCL SVOCs, and total cyanide.

Sampling will be performed in general accordance with the procedures described in the New York State Department of Environmental Conservation- (NYSDEC-) approved Generic Site Characterization/IRM Work Plan for Site Investigations at Non-Owned Former MGP Sites and supporting appendices (Field Sampling Plan and Quality Assurance Project Plan), prepared by Foster Wheeler Corporation on behalf of Niagara Mohawk, dated November 2002. Sample analyses will be performed by an Environmental Laboratory Accreditation Program-certified laboratory in accordance with the most recent version of the NYSDEC's Analytical Services Protocol, and the selected analytical laboratory will provide Category B data packages. Sampling results will be validated and a Data Usability Summary Report will be prepared. The results of the data validation will be incorporated into the analytical data table to be provided in National Grid's subsequent letter report.

Riverbank Reconnaissance

A riverbank reconnaissance will be conducted consistent with the requirements of the July 2025 Interim Site Management Plan, prepared by Arcadis of New York, Inc. (Arcadis). This event will comprise the first annual riverbank reconnaissance. Riverbank reconnaissance activities will be

conducted on the western riverbank of the Salmon River adjacent to the Site and north (downstream) of the Site. The parcels downstream of the Site are three contiguous properties currently owned by Franklin County: Tax Parcel 98.81-1-4, Tax Parcel 98.81-1-3.200, and Tax Parcel 98.81-1-1. Please refer to Attachment 2, which contains Figure 2 of the Interim Site Management Plan, for the locations of the three downstream parcels included in the reconnaissance. Prior riverbank reconnaissance efforts were conducted between 2010 and 2022 and revealed Site-related impacts in the form of hardened tar in isolated areas along the western riverbank adjacent to the Site and on two of the County-owned downstream parcels (Tax Parcel 98.81-1-4 and Tax Parcel 98.81-1-3.200). Observations made during these efforts indicated essentially the same occurrences of tar. The purpose of the 2025 reconnaissance is to evaluate whether conditions (e.g., tar presence/absence) have changed since 2022. A summary of the riverbank reconnaissance efforts and associated findings will be provided in National Grid's letter report described below and incorporated into the AAR.

Consistent with prior work, the reconnaissance will consist of walking along the riverbank adjacent to the Site and the parcels north of the Site to visually observe the bank and document the presence of tar, break up tar pieces by hand for closer inspection, and determine the extent of tar to the extent feasible. The visual appearance and extent of the tar will be recorded in a field notebook and photo-documented. Each tar piece, grouping of tar pieces (if several were observed in close proximity to each other), or larger mass of tar will be flagged and assigned an identification number. The distance between the flags will be measured using a measuring tape with respect to established control points (control points for prior reconnaissance events consisted of a drainage pipe outlet and large boulder that can be observed on aerial imagery).

Reporting

National Grid is prepared to conduct the groundwater sampling and riverbank reconnaissance in fall 2025, following the NYSDEC's written approval of the scope detailed in this letter. National Grid will notify the NYSDEC a minimum of 7 calendar days prior to starting the field work. We expect that the sampling and reconnaissance can be completed within approximately 4 to 5 days.

National Grid will provide a letter report of the groundwater sampling and associated analytical results, as well as the riverbank reconnaissance results, to the NYSDEC and New York State Department of Health approximately 2 months after the samples have been collected. The letter report will include:

- a description of the riverbank reconnaissance activities;
- a discussion of the current reconnaissance results and a comparison to previous results;
- a figure showing the monitoring well and seep locations and sampling results;
- a figure depicting the locations of reconnaissance observations;

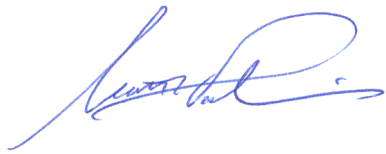
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- a photograph log of reconnaissance observations; and
- tabulated analytical results in comparison to the Technical Operational Guidance Series Memorandum 1.1.1 Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, prepared by the NYSDEC's Division of Water, dated June 1998.

Closing

National Grid will incorporate the 2025 and previous sampling results into the AAR. We appreciate the NYSDEC's support and responsiveness to this project. If you have any questions or require any additional information, please do not hesitate to contact me at (315) 461-7892 or at brian.stearns@nationalgrid.com.

Yours Sincerely,



, on behalf of

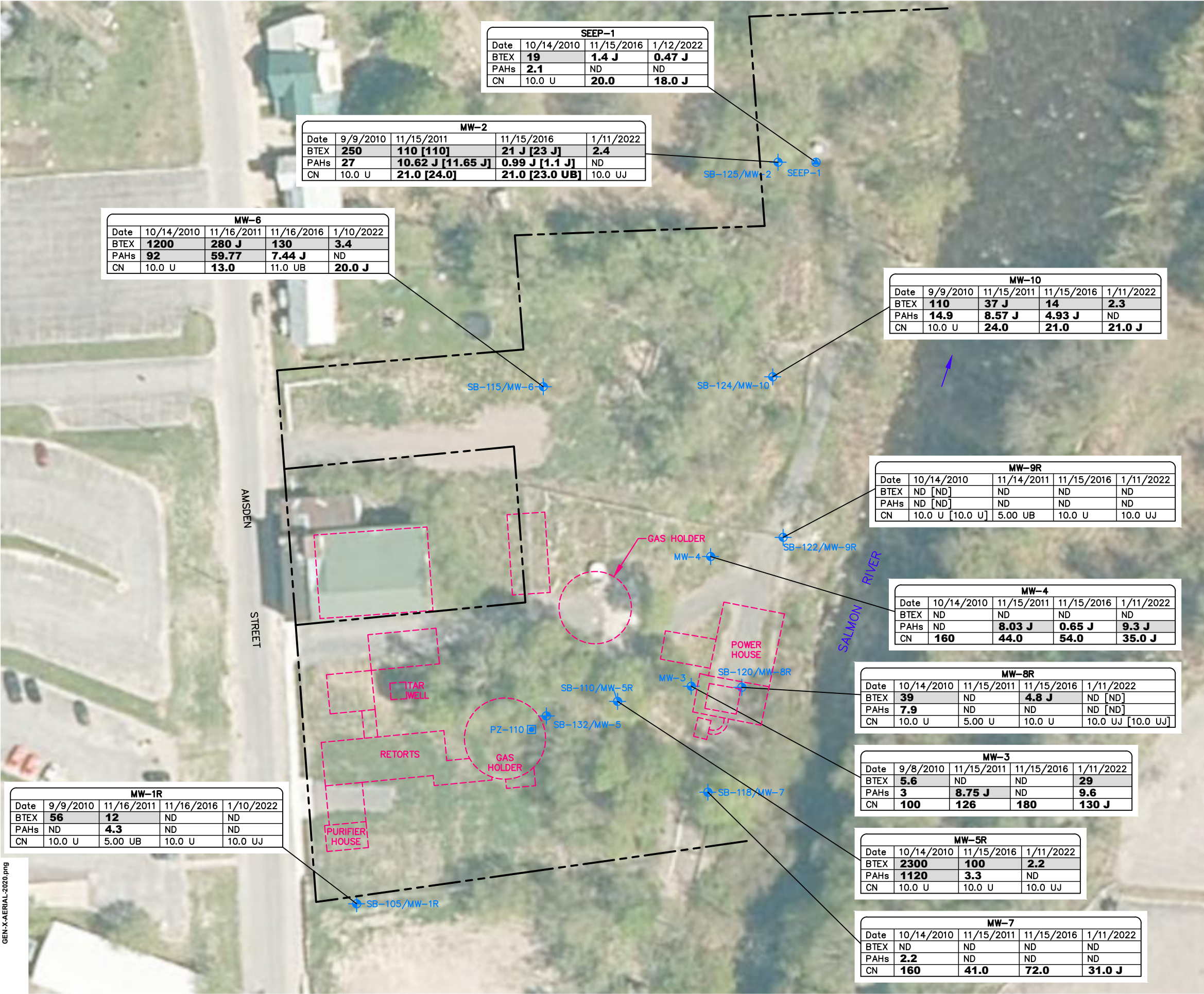
Brian Stearns, PE
Manager, Site Investigation & Remediation – Upstate NY

Attachments

ec: Steven Stucker (National Grid)
M. Benoit, PE (Arcadis)
C. Geraci (Arcadis)
S. Powlin (Arcadis)

Attachment 1

Figure 1 from National Grid's April 19, 2022 Letter

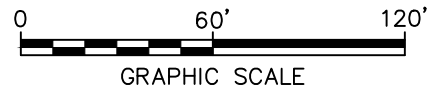


LEGEND:

PZ-110 [] PIEZOMETER LOCATION
MW-3 [] MONITORING WELL LOCATION
SEEP-1 [] SEEP SAMPLE LOCATION
- - - NATIONAL GRID PROPERTY LINE
- - - HISTORIC STRUCTURE BASED ON 1923 SANBORN MAP

J INDICATES AN ESTIMATED VALUE
ND NOT DETECTED
B ONE OR MORE CONSTITUENTS DETECTED IN A LABORATORY BLANK
U THE COMPOUND WAS ANALYZED FOR BUT NOT DETECTED. THE ASSOCIATED VALUE IS THE COMPOUND QUANTITATION LIMIT.
[] RESULTS IN BRACKETS ARE FOR DUPLICATE SAMPLES

- NOTES:**
1. BASE MAP PREPARED FROM SURVEY CONDUCTED BY THEW ASSOCIATES, DATED 9/13/10. MAP IS REFERENCED HORIZONTALLY TO THE NORTH AMERICAN DATUM OF 1983 (NAD83) AND PROJECTED ON THE NEW YORK STATE PLANE COORDINATE SYSTEM (EAST ZONE) AND VERTICALLY TO THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88). NORTH ARROW AS SHOWN INDICATES GRID NORTH REFERENCED TO NAD83 AND PROJECTED ON THE NEW YORK STATE PLANE COORDINATE SYSTEM (EAST ZONE).
 2. ALL LOCATIONS ARE APPROXIMATE.
 3. SHADED RESULTS INDICATE THAT AT LEAST ONE BTEX OR PAH COMPOUND OR CYANIDE EXCEEDS THE NEW YORK STATE CLASS GA STANDARDS OR GUIDANCE VALUES. BOLD RESULTS INDICATE DETECTED CONCENTRATION.
 4. RESULTS GIVEN IN $\mu\text{g/L}$.



**NATIONAL GRID
MALONE (AMSDEN STREET) FORMER MGP SITE**

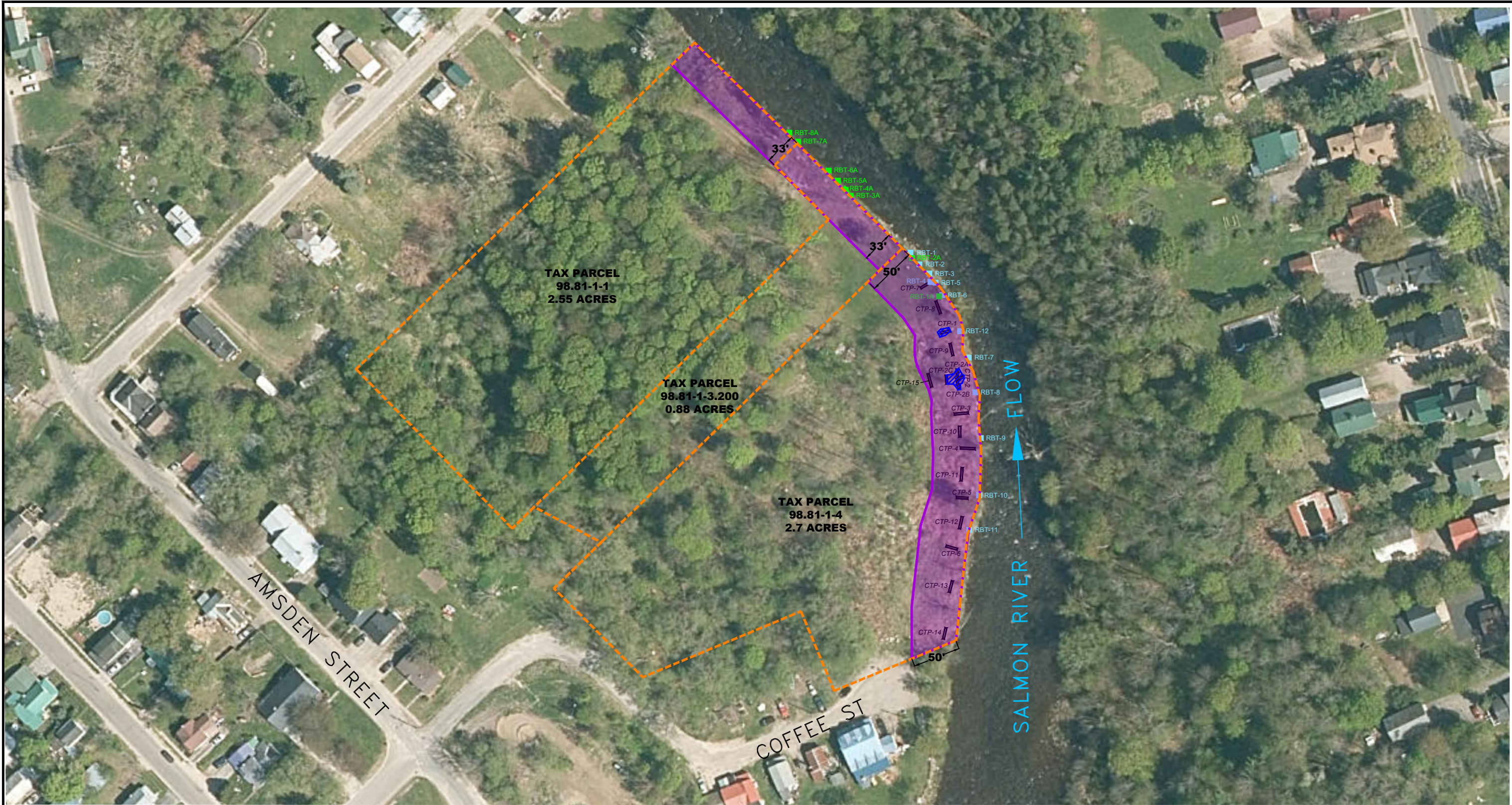
GROUNDWATER ANALYTICAL RESULTS

ARCADIS

**FIGURE
1**

Attachment 2

Figure 2 from July 2025 ISMP

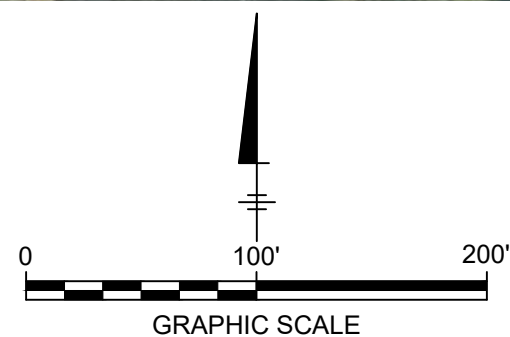


LEGEND:

- APPROXIMATE PARCEL BOUNDARY
- TEST PIT LOCATION
- TAR PIECE(S) OBSERVED AND REMOVED ON RIVER BANK (JULY 29, 2013)
- TAR OBSERVED ON RIVER BANK (AUGUST 22, 2014)
- APPROXIMATE DCR BOUNDARY
- 2014 INTERIM REMEDIAL MEASURE EXCAVATION LIMITS
- DCR
- DECLARATION OF COVENANTS AND RESTRICTIONS

NOTES:

1. AERIAL PHOTOGRAPH OBTAINED FROM:
<https://orthos.its.ny.gov/arcgis/rest/services/wms/2020/MapServer>.
IMAGE DATED APRIL/MAY 2020.
2. 2022 PARCEL DATA FOR FRANKLIN COUNTY, NEW YORK, WAS OBTAINED FROM ESRI FEATURE SERVICES.
3. EACH OF THREE PARCELS COMPRISING THE PROPERTY ARE OWNED BY THE COUNTY OF FRANKLIN AND EACH HAVE A SEPARATE DCR.



NATIONAL GRID
MALONE (AMSDEN STREET) FORMER MGP SITE
MALONE, NEW YORK
INTERIM SITE MANAGEMENT PLAN

THE PROPERTY



FIGURE

2