June 10, 2019 Project No. 19122588

New York State Department of Environmental Conservation
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SAMPLING WORK PLAN FOR EMERGING CONTAMINANTS AT FORMER MILLER CONTAINER SITE

Background

The New York State Department of Environmental Conservation (NYSDEC) has requested sampling for "emerging contaminants" at the Former Miller Container Site (Site) located in Volney, NY (Code 738029) (Figure 1), in accordance with NYSDEC's July 2018 guidance document *Groundwater Sampling for Emerging Contaminants"*. To accommodate this request, four (4) sets of groundwater samples shall be collected from representative areas of the Site: one upgradient location and three downgradient locations, respective to the historically impacted and remediated areas on the Site. The locations of the proposed sample collection points and an overall Site plan are shown on Figure 2.

Proposed Sample Collection Points and Analyses

Groundwater samples shall be collected from cross or upgradient monitoring well MW-60D, and downgradient monitoring wells MW-16D, MW-38S and MW-61D. Quality Control (QC) samples will also be collected in the form of one (1) blind duplicate, one (1) matrix spike/matrix spike duplicate (MS/MSD), and one (1) field (equipment) blank. Samples will be analyzed by an Environmental Laboratory Approval Program (ELAP) -certified laboratory. The following table presents the analysis and method for each sample.

Analysis	Method	Detection Limit (max.)
Per- and polyfluoroalkyl substances (PFAS) full target analyte list (TAL)	Modified EPA Method 537	2 ng/L
1,4 -dioxane	EPA Method 8270 SIM	0.35 µg/L

Sample Collection Methods

The sample collection and analytical methods shall be consistent with the NYSDEC's July 2018 Groundwater Sampling for Emerging Contaminants guidance document (Attachment 1) and Alpha Analytical EPA 537 (PFAS) Field Sampling Guidelines (Attachment 1), and include the following limitations:

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- Launder clothing items to be worn during sampling multiple times prior to sampling event; do NOT wear waterproofed clothing or items containing polytetrafluoroethylene (PTFE) materials;
- Avoid the use of cosmetics, moisturizers, hand creams, deodorants, perfumes, or unauthorized sunscreens and bug repellants the morning of sampling;
- Avoid the use of items containing perfluorinated compounds during the sampling event (including packaged items such as food and drink);
- Use a decontaminated stainless steel or new polypropylene, high density polyethylene (HDPE), or polyvinyl chloride (PVC) bailer, with clean rope, at each location;
- If a sampling instrument becomes contaminated, use standard two-step decontamination procedure with detergent and clean water rinse prior to collecting sample;
- Purge the well or piezometer until temperature, conductivity, and pH stabilize (may be four or more well volumes);
- Wait until the well or piezometer recovers to 80 percent of its initial water level before collecting sample;
- Wearing clean nitrile gloves, collect the sample at each location using the following procedure:
    1. Fill the pre-cleaned HDPE or polypropylene bottles with the sample according to laboratory instructions.
    2. Cap bottles with acceptable cap and liner closure system.
    3. Label the sample bottles with sample ID, date/time collected, analysis to be performed, and sampler initials.
    4. Fill out the chain of custody legibly and completely.
    5. Store samples on ice in a cooler and maintain a temperature of 4 ± 2°C.

Schedule and Reporting

Once this proposed Work Plan is approved by NYSDEC, the sampling activities will be scheduled. Samples will be analyzed by an approved laboratory to be determined after quotes have been received. Standard turnaround time for analytical results is approximately 15 business days. The laboratory shall provide a full category B deliverable report to Operations and Maintenance Inc (OMI). Upon receipt of laboratory analytical data, OMI shall contract for the preparation of a Data Usability Summary Report (DUSR) and submit electronically in accordance with NYSDEC electronic submittal requirements.

Figure 1 – Site Vicinity Location Map

Figure 2 – Proposed Monitoring Well Sampling Locations

Attachment 1 – NYSDEC's Groundwater Sampling for Emerging Contaminants – July 2018

Alpha Analytical EPA 537 (PFAS) Field Sampling Guidelines

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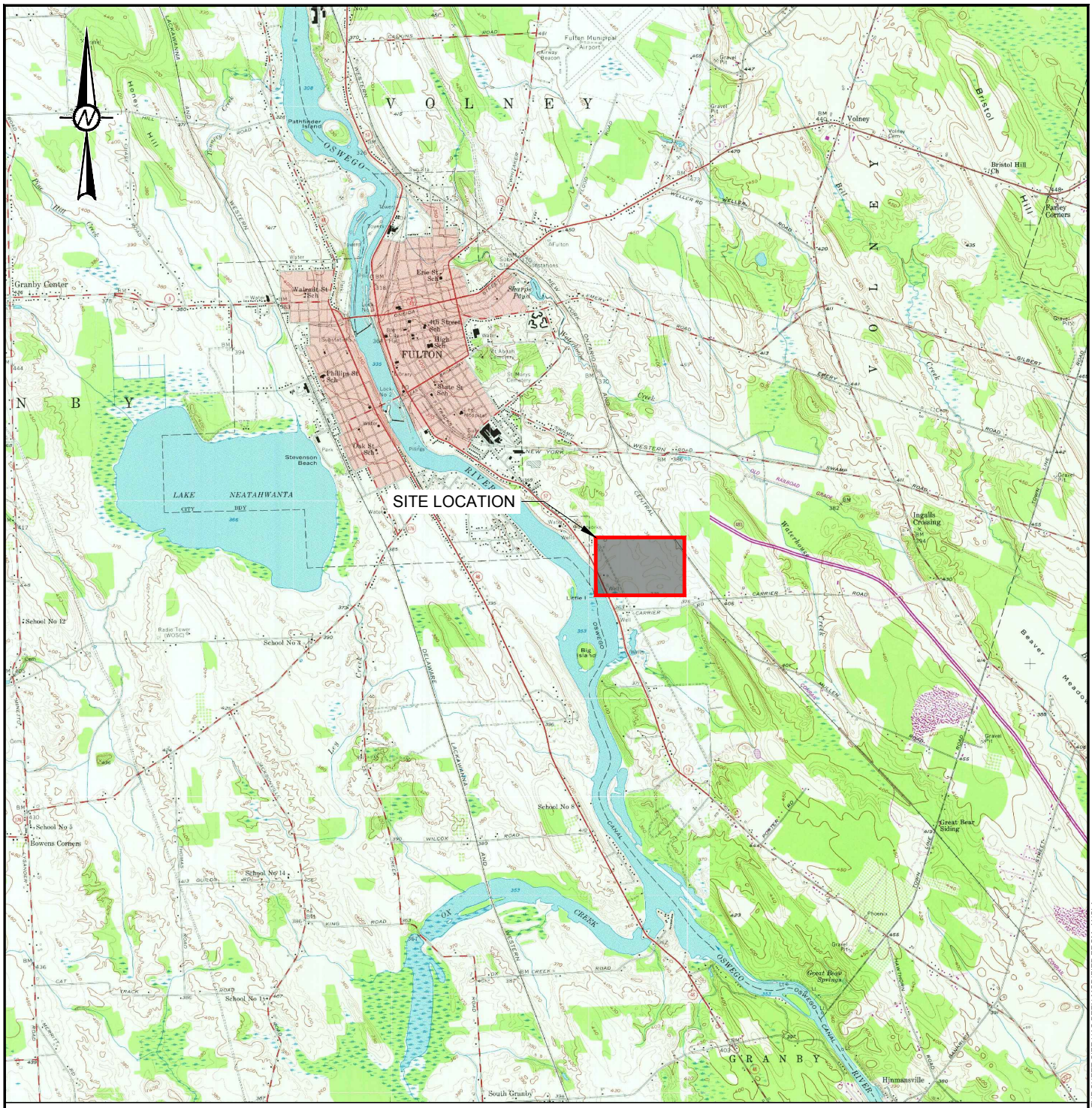
Figures



REFERENCE:
BASEMAP TAKEN FROM U.S.G.S. 7.5 MINUTE QUADRANGLE OF FULTON, NEW YORK
DATED 1955.

0 2500 5000
1" = 5000' FEET

CLIENT
OPERATIONS AND MAINTENANCE INC.

CONSULTANT
GOLDER

YYYY-MM-DD	2019-06-10
DESIGNED	PTM
PREPARED	RWC
REVIEWED	PTM
APPROVED	PTM

PROJECT
EMERGING CONTAMINANTS SAMPLING WORK PLAN
FORMER MILLER CONTAINER SITE
FULTON, NEW YORK 13069

TITLE
SITE LOCATION MAP

PROJECT NO.	CONTROL	REV.	FIGURE
19122588	001	0	01

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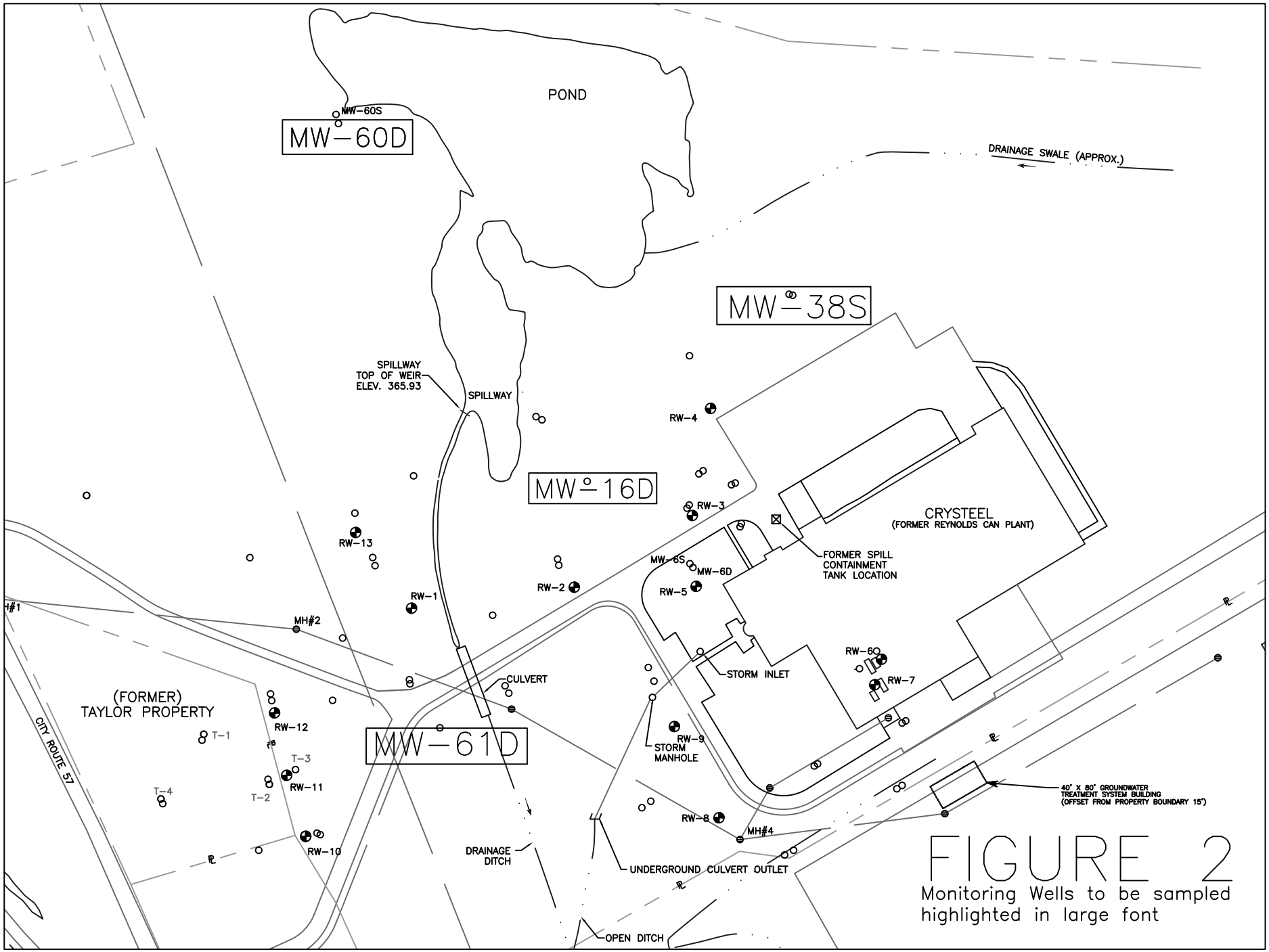

FIGURE 2

Monitoring Wells to be sampled highlighted in large font

Attachment 1

Groundwater Sampling for Emerging Contaminants

July 2018

Issue: NYSDEC has committed to analyzing representative groundwater samples at remediation sites for emerging contaminants (1,4-dioxane and PFAS) as described in the below guidance.

Implementation

NYSDEC project managers will be contacting site owners to schedule sampling for these chemicals. Only groundwater sampling is required. The number of samples required will be similar to the number of samples where "full TAL/TCL sampling" would typically be required in a remedial investigation. If sampling is not feasible (e.g., the site no longer has any monitoring wells in place), sampling may be waived on a site-specific basis after first considering potential sources of these chemicals and whether there are water supplies nearby.

Upon a new site being brought into any program (i.e., SSF, BCP), PFAS and 1,4-dioxane will be incorporated into the investigation of groundwater as part of the standard "full TAL/TCL" sampling. Until an SCO is established for PFAS, soil samples do not need to be analyzed for PFAS unless groundwater contamination is detected. Separate guidance will be developed to address sites where emerging contaminants are found in the groundwater. The analysis currently performed for SVOCs in soil is adequate for evaluation of 1,4-dioxane, which already has an established SCO.

Analysis and Reporting

Labs should provide a full category B deliverable, and a DUSR should be prepared by an independent 3rd party data validator. QA/QC samples should be collected as required in DER-10, Section 2.3(c). The electronic data submission should meet the requirements provided at: https://www.dec.ny.gov/chemical/62440.html ,

The work plan should explicitly describe analysis and reporting requirements.

PFAS sample analysis: Currently, ELAP does not offer certification for PFAS compounds in matrices other than finished drinking water. However, laboratories analyzing environmental samples (ex. soil, sediments, and groundwater) are required, by DER, to hold ELAP certification for PFOA and PFOS in drinking water by EPA Method 537 or ISO 25101.

Modified EPA Method 537 is the preferred method to use for groundwater samples due to the ability to achieve 2 ng/L (ppt) reporting limits. If contract labs or work plans submitted by responsible parties indicate that they are not able to achieve similar reporting limits, the project manager should discuss this with a DER chemist. Note: Reporting limits for PFOA and PFOS should not exceed 2 ng/L.

PFAS sample reporting: DER has developed a PFAS target analyte list (below) with the intent of achieving reporting consistency between labs for commonly reportable analytes. It is expected that reported results for PFAS will include, at a minimum, all the compounds listed. This list may be updated in the future as new information is learned and as labs develop new capabilities. If lab and/or matrix specific issues are encountered for any particular compounds, the NYSDEC project manager will make case-by-case decisions as to whether particular analytes may be temporarily or permanently discontinued from analysis for each site. Any technical lab issues should be brought to the attention of a NYSDEC chemist.

Some sampling using this full PFAS target analyte list is needed to understand the nature of contamination. It may also be critical to differentiate PFAS compounds associated with a site from other sources of these chemicals. Like routine refinements to parameter lists based on investigative findings, the full PFAS target analyte list may not be needed for all sampling intended to define the extent of contamination. Project managers may approve a shorter analyte list (e.g., just the UCMR3 list) for some reporting on a case by case basis.

1,4-Dioxane Analysis and Reporting: The method detection limit (MDL) for 1,4-dioxane should be no higher than 0.35 µg/l (ppb). Although ELAP offers certification for both EPA Method 8260 SIM and EPA Method 8270 SIM, DER is advising the use of method 8270 SIM. EPA Method 8270 SIM provides a more robust extraction procedure, uses a larger sample volume, and is less vulnerable to interference from chlorinated solvents.

Full PFAS Target Analyte List

Group	Chemical Name	Abbreviation	CAS Number
Perfluoroalkyl sulfonates	**Perfluorobutanesulfonic acid**	**PFBS**	**375-73-5**
	Perfluorohexanesulfonic acid	**PFHxS**	**355-46-4**
	Perfluoroheptanesulfonic acid	PFHpS	375-92-8
	Perfluorooctanessulfonic acid	**PFOS**	**1763-23-1**
	Perfluorodecanesulfonic acid	PFDS	335-77-3
Perfluoroalkyl carboxylates	Perfluorobutanoic acid	PFBA	375-22-4
	Perfluoropentanoic acid	PFPeA	2706-90-3
	Perfluorohexanoic acid	PFHxA	307-24-4
	Perfluoroheptanoic acid	**PFHpA**	**375-85-9**
	Perfluorooctanoic acid	**PFOA**	**335-67-1**
	Perfluorononanoic acid	**PFNA**	**375-95-1**
	Perfluorodecanoic acid	PFDA	335-76-2
	Perfluoroundecanoic acid	PFUA/PFUdA	2058-94-8
	Perfluorododecanoic acid	PFDoA	307-55-1
	Perfluorotridecanoic acid	PFTriA/PFTrDA	72629-94-8
	Perfluorotetradecanoic acid	PFTA/PFTeDA	376-06-7
Fluorinated Telomer Sulfonates	6:2 Fluorotelomer sulfonate	6:2 FTS	27619-97-2
	8:2 Fluorotelomer sulfonate	8:2 FTS	39108-34-4
Perfluorooctane-sulfonamides	Perfluroroctanesulfonamide	FOSA	754-91-6
Perfluorooctane-sulfonamidoacetic acids	N-methyl perfluorooctanesulfonamidoacetic acid	N-MeFOSAA	2355-31-9
	N-ethyl perfluorooctanesulfonamidoacetic acid	N-EtFOSAA	2991-50-6

Bold entries depict the 6 original UCMR3 chemicals

EPA 537 (PFAS) Field Sampling Guidelines

PLEASE READ INSTRUCTIONS ENTIRELY PRIOR TO SAMPLING EVENT

Sampling for PFAS via EPA 537 can be challenging due to the prevalence of these compounds in consumer products. The following guidelines are strongly recommended when conducting sampling.

Reference-NHDES https://www.des.nh.gov/organization/divisions/waste/hwrb/documents/pfc-stakeholder-notification-20161122.pdf

FIELD CLOTHING and PPE

- No clothing or boots containing Gore-Tex®
- All safety boots made from polyurethane and PVC
- No materials containing Tyvek®
- Do not use fabric softener on clothing to be worn in field
- Do not used cosmetics, moisturizers, hand cream, or other related products the morning of sampling
- Do not use unauthorized sunscreen or insect repellant (see reference above for acceptable products)

FOOD CONSIDERATIONS

No food or drink on-site with exception of bottled water and/or hydration drinks (i.e., Gatorade and Powerade) that is available for consumption only in the staging area

OTHER RECOMMENDATIONS

Sample for PFAS first! Other containers for other methods may have PFAS present on their sampling containers

SAMPLE CONTAINERS

- All sample containers made of HDPE or polypropylene
- Caps are unlined and made of HDPE or polypropylene (no Teflon® -lined caps)

WET WEATHER (AS APPLICABLE)

Wet weather gear made of polyurethane and PVC only

EQUIPMENT DECONTAMINATION

- "PFAS-free" water on-site for decontamination of sample equipment. No other water sources to be used
- Only Alconox and Liquinox can be used as decontamination materials

FIELD EQUIPMENT

- Must not contain Teflon® (aka PTFE) or LDPE materials
- All sampling materials must be made from stainless steel, HDPE, acetate, silicon, or polypropylene
- No waterproof field books can be used
- No plastic clipboards, binders, or spiral hard cover notebooks can be used
- No adhesives (i.e. Post-It® Notes) can be used
- Sharpies and permanent markers not allowed; regular ball point pens are acceptable
- Aluminum foil must not be used
- Keep PFC samples in separate cooler, away from sampling containers that may contain PFAS
- Coolers filled with regular ice only - Do not use chemical (blue) ice packs

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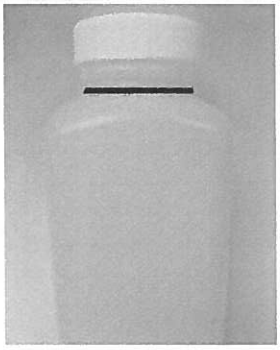
EPA 537 (PFAS) Field Sampling Guidelines

PLEASE READ INSTRUCTIONS ENTIRELY PRIOR TO SAMPLING EVENT

Sampler must wash hands before wearing nitrile gloves in order to limit contamination during sampling. Each sample set requires a set of containers to comply with the method as indicated below. **Sample set is composed of samples collected from the same sample site and at the same time.*

Container Count	Container Type	Preservative
3 Sampling Containers - Empty	250 mL container	Pre preserved with 1.25 g Trizma
1 Reagent Water for Field Blank use	250 mL container	Pre preserved with 1.25 g Trizma
P1 Field Blank (FRB) - Empty	250 mL container	Unpreserved

Sampling container must be filled to the neck. For instructional purposes a black line has been drawn to illustrate the required fill level for each of the 3 Sample containers



Field blanks are recommended and the containers have been provided, please follow the instructions below.

Field Blank Instructions:

1. Locate the Reagent Water container from the bottle order. The Reagent Water container will be pre-filled with PFAS-free water and is preserved with Trizma.
2. Locate the empty container labeled "Field Blank".
3. Open both containers and proceed to transfer contents of the "Reagent Water" container into the "Field Blank" container.
4. If field blanks are to be analyzed, they need to be noted on COC, and will be billed accordingly as a sample.

Both the empty Reagent Water container and the filled Field Blank container must be returned to the lab along with the samples taken.

Sampling Instructions:

1. Each sampling event requires 3 containers to be filled to the neck of the provided containers for each sampling location.
2. Before sampling, remove faucet aerator, run water for 5 min, slow water to flow of pencil to avoid splashing and fill sample containers to neck of container (as previously illustrated) and invert 5 times.
3. Do not overfill or rinse the container.
4. Close containers securely. Place containers in sealed ZipLoc® bags, and in a separate cooler (no other container types).
5. Ensure Chain-of-Custody and all labels on containers contain required information. Place sample, Field Blank and empty Reagent Blank containers in ice filled cooler (do not use blue ice) and return to the laboratory. Samples should be kept at 4°C ±2. Samples must not exceed 10°C during first 48 hours after collection. Hold time is 14 days.

Please contact your Alpha Analytical project manager with additional questions or concerns.

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PerFluorinated Compound (PFC) Sample Collection Guidance

The purpose of this document is to provide guidance on groundwater sampling protocols when collecting a sample(s) for PFCs. Detection of these compounds at very low levels can be influenced by materials that are present at the sampling site, materials used by the sampling agent, or sample container handling practices.

The following table provides a summary of items that are likely to contain PFCs (i.e. prohibited items) and therefore should not be used by the sampling agent at the sampling site.

Category	Prohibited Items	Allowable Items
Pumps and Tubing	Teflon® and other fluoropolymer containing materials	High-density polyethylene (HDPE), low density polyethylene (LDPE) , or silicone tubing, peristaltic pump or stainless steel submersible pump
Decontamination	Decon 90	Alconox® or Liquinox®, potable water followed by deionized rinse.
Sample Storage and Preservation	LDPE or glass bottles, PTFE-or Teflon®-lined caps, chemical ice packs	Laboratory-provided sample container -*preferred*; or, HDPE or polypropylene bottles, regular ice
Field Documentation	Waterproof/treated paper or field books, plastic clipboards, non-Sharpie® markers, Post-It® and other adhesive paper products	Plain Paper, metal clipboard, Sharpies®, pens
Clothing	Clothing or boots made of or with Gore-Tex™ or other synthetic water resistant and/or stain resistant materials, Tyvek® material	Synthetic or cotton material, previously laundered clothing (preferably previously washed greater than six times) without the use of fabric softeners
Personal Care Products (for day of sample collection)	Cosmetics, moisturizers, hand cream and other related products	Suncreens: Alba Organics Natural Yes to Cucumbers Aubrey Organics Jason Natural Sun Block Kiss My Face Baby-safe sunscreens ('free' or 'natural) Insect Repellents: Jason Natural Quit Bugging Me Repel Lemon Eucalyptus Herbal Armor California Baby Natural Bug Spray BabyGanics Sunscreen and Insect Repellents: Avon Skin So Soft Bug Guard-SPF 30
Food and Beverage	Pre-packaged food, fast food wrappers or containers	Bottled water or hydration drinks