



**Department of
Environmental
Conservation**

KATHY HOCHUL

Governor

AMANDA LEFTON

Commissioner

January 16, 2026

Matthew Walsh
Manager, Health & Safety
GTE Operations Support Incorporated
1 Verizon Way, VC33E039
Basking Ridge, New Jersey 07920-1097

Re: PFAS and 1,4-Dioxane Groundwater Sampling Work Plan
G.T.E. Products Corporation Site
Site No.: 850003
Town of Seneca Falls, Seneca (C)

Dear Mr. Walsh:

The New York State Department of Environmental Conservation (Department) in conjunction with New York State Department of Health (NYSDOH) have completed a review of the November 20, 2025 PFAS and 1,4-Dioxane Groundwater Sampling Work Plan (Work Plan) for the G.T.E. Products Corporation site (Site) located at 50 Johnston Street, Town of Seneca Falls, Seneca County. Based on the information presented in the Work Plan, the Department is conditionally approving the Work Plan with the following modifications and clarifications.

1. The Department understands that the purge and decon fluids associated with the groundwater sampling event will be disposed off-site at a permitted facility.
2. The Department understands that PFAS reporting limit will be 2 ng/L.
3. The Department understands that groundwater samples will be analysis at a NYSDOH ELAP certified laboratory certified for the analytical method.
4. The Department understands that the report presenting the validated data will also include the groundwater sampling logs from the groundwater sampling event.

NYSDEC seeks to resolve outstanding differences in a mutually agreeable manner which addresses the requirements of the RCRA Corrective Action Order on Consent, Part 375, and all applicable laws, regulations, and guidance. If you or your technical team have any questions or concerns regarding this request, please contact me via email at charlotte.theobald@dec.ny.gov or at 585-226-5354. If your legal team have any questions or concerns regarding this request, please feel free to contact Michael Murphy via e-mail at Michael.Murphy1@dec.ny.gov or at 518-402-8564.

Sincerely,

A handwritten signature in black ink that reads "Charlotte B. Theobald".

Charlotte B. Theobald
Assistant Engineer

ec:

Mark Flusche (Arcadis)
Christopher Davern (Arcadis)

Michael Higgins (Arcadis)
Suzie Bower (Arcadis)
Stephen Bregande (Seneca Falls Specialties & Logistics)
J. Christopher Woods (Seneca Falls Specialties & Logistics)
Anthony Halling (Philips North America, LLC)
Charles Harewood (USEPA)
Justin Demining (NYSDOH)
Julia Kenney (NYSDOH)
David Pratt (NYSDEC)

Charlotte B. Theobald
Assistant Engineer
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road
Avon, NY 14414

Arcadis of New York, Inc.
646 Plank Road
Suite 100
Clifton Park, New York 12065
United States
Phone: 518 250 7300
www.arcadis.com

Date: November 20, 2025
Our Ref: 30245593
Subject: PFAS and 1,4-Dioxane Groundwater Sampling Work Plan
Site #850003 – G.T.E. Products Corporation
Former Philips Display Components Facility, Seneca Falls, New York
USEPA ID # NYD002246015

Dear Ms. Theobald,

Arcadis of New York, Inc. (Arcadis) has prepared this PFAS and 1,4-Dioxane Groundwater Sampling Work Plan (Work Plan) for the Former Philips Display Components Facility (NYSDEC Site No. 850003, G.T.E., Products Corporation) located at 50 Johnston Street, Seneca Falls, New York (the Site; Figure 1) on behalf of GTE Operations Support Incorporated (GTEOSI) for submission to the New York State Department of Environmental Conservation (NYSDEC).

In NYSDEC's February 10, 2025, letter to GTEOSI providing comments on the May 2024 100% Remedial Design Report, NYSDEC requested that groundwater sampling for per- and polyfluoroalkyl substances (PFAS) and 1,4-dioxane be conducted prior to the start of the electrical resistive heating remedy. This Work Plan summarizes the proposed groundwater sampling to be performed in response to NYSDEC's February 10, 2025, Comment Letter. This Work Plan was prepared following the "Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS)" guidance document issued by NYSDEC in April 2023 (April 2023 PFAS Sampling Guidance) and includes a figure indicating the monitoring wells from which groundwater will be sampled. The rationale for monitoring well selection, and details regarding field sampling and analysis procedures, reporting, and the proposed schedule are presented below.

Background

The following summarizes historical operations and a review of Site records with respect to the potential presence of PFAS and 1,4-dioxane at the Site.

PFAS

The Site historically manufactured black and white, and later color, cathode ray tubes (CRTs) for televisions. While there is no direct evidence and historical industrial procedures were typically not fully disclosed or documented regarding the use of PFAS in CRT manufacturing, PFAS were used in the electronics industry to manufacture semiconductors and printed circuit boards (ITRC Technical/Regulatory Guidance Per- and Polyfluoroalkyl Substances (PFAS) (ITRC September 2023). However, a review of historical Site records

indicates no evidence of semiconductor, printed circuit board, or other electronics manufacturing. Site records also indicate no evidence of PFAS being used, stored, or manufactured at the Site. Therefore, no source of PFAS has been identified.

****1,4-Dioxane****

1,4-Dioxane is a synthetic industrial chemical that was used as a stabilizer in chlorinated solvents, particularly 1,1,1-trichloroethane (1,1,1-TCA). Although chlorinated solvents have been used to degrease components in television tube manufacturing, 1,1,1-TCA has not been identified as a solvent used at the Site. Based on soil and groundwater concentrations, trichloroethene was the degreaser used.

In the 452 soil samples collected at the Site during previous investigations, 1,1,1-TCA was not reported at concentrations above laboratory reporting limits [RFI Report (URS 2002), Corrective Measures Study Report (Arcadis 2013), and Pre-Design Investigation Report (Arcadis 2022)]. 1,1,1-TCA has only occasionally been reported in groundwater at the Site. Concentrations of 1,1,1-TCA exceeding the NYSDEC Class GA standard of 5 µg/L were reported at monitoring wells MW-1 (east of Building 13) and MW-25 (within Area of Concern 3 and south of Building 11), as well as at decommissioned monitoring well MW-8 (formerly located next to monitoring well MW-1), and in water collected from two manholes and two soil borings near MW-25. Concentrations of 1,1,1-TCA have been below laboratory reporting limits at monitoring well MW-1 for 9 years and at monitoring well MW-25 for 25 years. Based on this information, a potential source of 1,4-dioxane (i.e., 1,1,1-TCA) was present in groundwater near monitoring wells MW-1 and MW-25.

Monitoring Well Selection Rationale

Based on a review of on-Site and off-Site groundwater conditions, including historical and current concentrations of chlorinated volatile organic compounds (CVOCs) in groundwater (including 1,1,1-TCA), and vertical and horizontal groundwater flow gradients, five groundwater monitoring wells were selected for PFAS and 1,4-dioxane sampling: MW-1, MW-20, MW-23, MW-24, and MW-25. The locations of these wells and the identified trichloroethene (TCE) source areas south of Buildings 2 and 11 [Areas of Concern (AOC) 1 and 3, respectively] are indicated on Figure 2. These wells were selected to provide PFAS and 1,4-dioxane groundwater data from wells that are spatially distributed across the Site, and also where concentrations of 1,1,1-TCA were previously reported, using the following rationale:

- Upgradient
 - MW-20: overburden monitoring well near the northern Site boundary and hydraulically upgradient of the building complex and monitoring wells where CVOCs have been reported in groundwater.
- AOC 1 - Dense non-aqueous phase liquid (DNAPL) source area south of Building 2
 - MW-24: overburden monitoring well southeast of Building 2
- AOC 2 – Area of dissolved CVOCs in groundwater south of Buildings 7 and 9
 - MW-23: overburden well southeast of Building 7
- AOC-3 – DNAPL source area south of Building 11
 - MW-25: overburden well, southeast and downgradient of the Building 11 DNAPL source area
- Downgradient
 - MW-1: overburden well, to the east and downgradient of Buildings 10, 11, and 13, in the location of the highest historical concentrations of 1,1,1-TCA

Field Sampling

The groundwater sampling program for PFAS and 1,4-dioxane will follow NYSDEC's April 2023 PFAS Sampling Guidance. Although the guidance document does not include sampling for 1,4-dioxane, samples to be analyzed for 1,4-dioxane will be collected at the same time and using the same sampling method as the PFAS samples.

In accordance with the April 2023 PFAS Sampling Guidance, groundwater purging and sample collection will be conducted following United States Environmental Protection Agency (USEPA) Region I "Low Stress (low-flow) Purging and Sampling Procedure for Collecting Ground Water Samples from Monitoring Wells, Final" document, dated September 19, 2017. Groundwater purging and sampling will be performed using a peristaltic pump and dedicated, PFAS- and 1,4-dioxane-free (i.e., analyte-free), high density polyethylene (HDPE) and silicone tubing. The water level meter used to measure the depth to water in each well will be decontaminated with a phosphate-free detergent (i.e., Alconox) and rinsed with analyte-free distilled water between use at each well. Consistent with the April 2023 PFAS Sampling Guidance, sampling equipment and sample containers will not come in contact with aluminum foil, low density polyethylene (LDPE), glass (for PFAS samples only), or polytetrafluoroethylene (PTFE, Teflon™) materials. Each groundwater sample will be collected in a laboratory-provided, analyte-free bottle and placed in a cooler with ice for delivery to the analytical laboratory. Purged groundwater will be containerized in a 55-gallon steel drum staged on Site for transportation and disposal at an approved waste facility following waste characterization analyses and waste profile approval.

Clothing worn by sampling personnel will have been laundered multiple times without the use of fabric softeners and will not contain waterproof or water-resistant material. The sampler will wear nitrile gloves (to be changed frequently) while preparing for and during sampling, purging, and filling the sample bottles. Waterproof materials (i.e., notebooks, permanent markers, and plumbers thread seal tape) will not be used during groundwater purging or sample collection.

Semiannual groundwater sampling for VOCs at the Site is currently performed using passive diffusion bag (PDB) samplers. To avoid the potential for PFAS contamination from the PDB, the sampling event for PFAS and 1,4-dioxane will be conducted separately from, and after, completing the first semi-annual groundwater sampling event following NYSDEC approval of this Work Plan. After completing the semi-annual sampling event for VOCs, replacement PDBs will not be installed in the wells where PFAS and 1,4-dioxane sampling will take place. These wells will be allowed to equilibrate for approximately one month before collecting samples for analysis of PFAS and 1,4-dioxane, and PDBs will be re-deployed after PFAS and 1,4-dioxane sampling is completed.

Sample Analysis

Groundwater and quality assurance/quality control samples for the event will be analyzed for PFAS by a Eurofins laboratory. The samples will be analyzed using EPA Method 1633 for the PFAS Target Analyte List provided in Appendix G of the April 2023 PFAS Sampling Guidance. Samples will be analyzed for 1,4-dioxane using EPA Method 8270D SIM (with a reporting limit no higher than 0.35 micrograms per liter [$\mu\text{g/L}$]).

Quality assurance and quality control samples will consist of one duplicate, one equipment blank, one field blank, and one matrix spike/matrix spike duplicate. The equipment blank will be collected by pumping laboratory-supplied analyte-free water through dedicated silicone and HDPE tubing and into laboratory-supplied sample bottles. The field blank sample will be collected by pouring laboratory-supplied analyte-free water into laboratory-supplied sample bottles. The analytical data for the equipment blank and the field blank will be used to evaluate if PFAS or 1,4-dioxane contamination was introduced from the sampling equipment or during the sampling and handling process, respectively.

Ms. Charlotte Theobald
New York State Department of Environmental Conservation
November 20, 2025

Analytical results will be provided in a NYSDEC analytical service protocol (ASP) Category B data deliverable format. The data will be validated by a third-party in accordance with NYSDEC ASP and DER-10 Technical Guidance for Site Investigation and Remediation (NYSDEC 2010) guidelines, and a data usability summary report (DUSR) will be prepared documenting the adequacy of the analytical data obtained from the laboratory and discussing any quality control non-compliance issues or limitations on the use of the data.

A waste characterization sample will be collected from the purge water drum(s) and submitted for laboratory analysis as required by the selected waste disposal facility.

Reporting

Arcadis will submit the validated PFAS and 1,4-dioxane data to NYSDEC in a report within 90 days of receipt of the NYSDEC ASP Category B deliverables. The analytical results will be compared to the NYSDEC ambient water quality guidance values of 6.7 nanograms per liter (ng/L) for perfluorooctanoic acid (PFOA), 2.7 ng/L for perfluorooctanesulfonic acid (PFOS), and 0.35 µg/L for 1,4-dioxane. The following information will also be provided in the report:

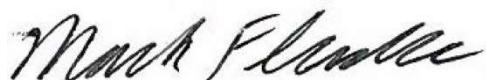
- Description of groundwater sampling activities;
- Category B laboratory reports;
- Data usability summary reports; and
- Observations and interpretation of the analytical results.

Schedule

The PFAS and 1,4-dioxane sampling detailed herein will be conducted within 5 weeks of receiving NYSDEC approval of this Work Plan.

Please call me at 518.250.7322 with any questions or comments regarding the information provided above.

Sincerely,
Arcadis of New York, Inc.



Mark Flusche, P.Hg.
Principal Hydrogeologist

Email: mark.flusche@arcadis.com
Direct Line: 515 250 7322
Mobile: 518 859 3579

Ms. Charlotte Theobald
New York State Department of Environmental Conservation
November 20, 2025

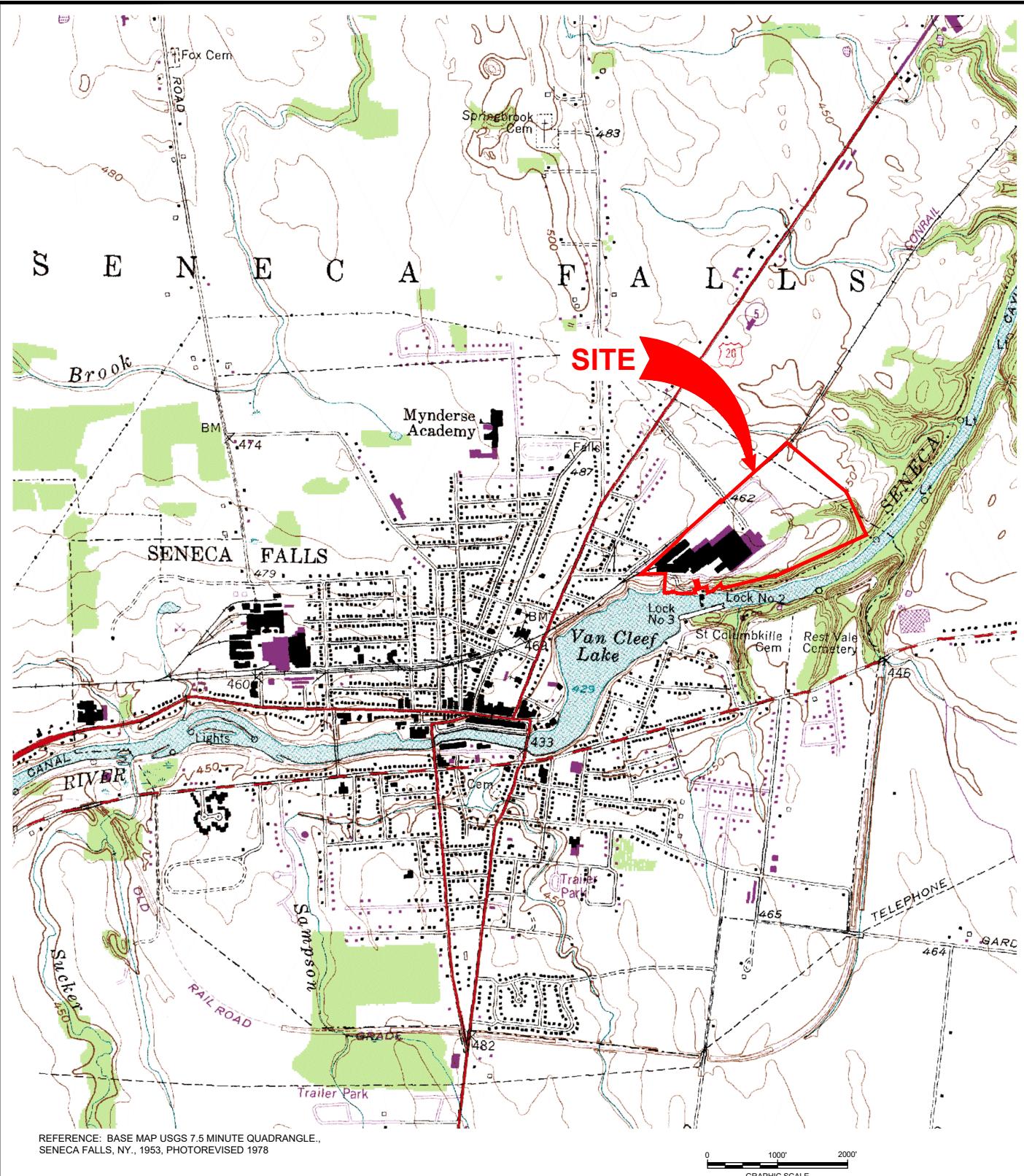
CC.

Mr. Matthew Walsh (GTEOSI)
Mr. David Pratt (NYSDEC)
Ms. Julia Kenney (NYSDOH)
Mr. Andy Park (USEPA)
Mr. Charles Harewood (USEPA)
Mr. Stephen Bregande (Seneca Falls Specialties & Logistics Company, Inc.)
Mr. J. Christopher Woods (Seneca Falls Specialties & Logistics Company, Inc.)
Mr. Anthony Halling (Philips North America LLC)

Enclosures:

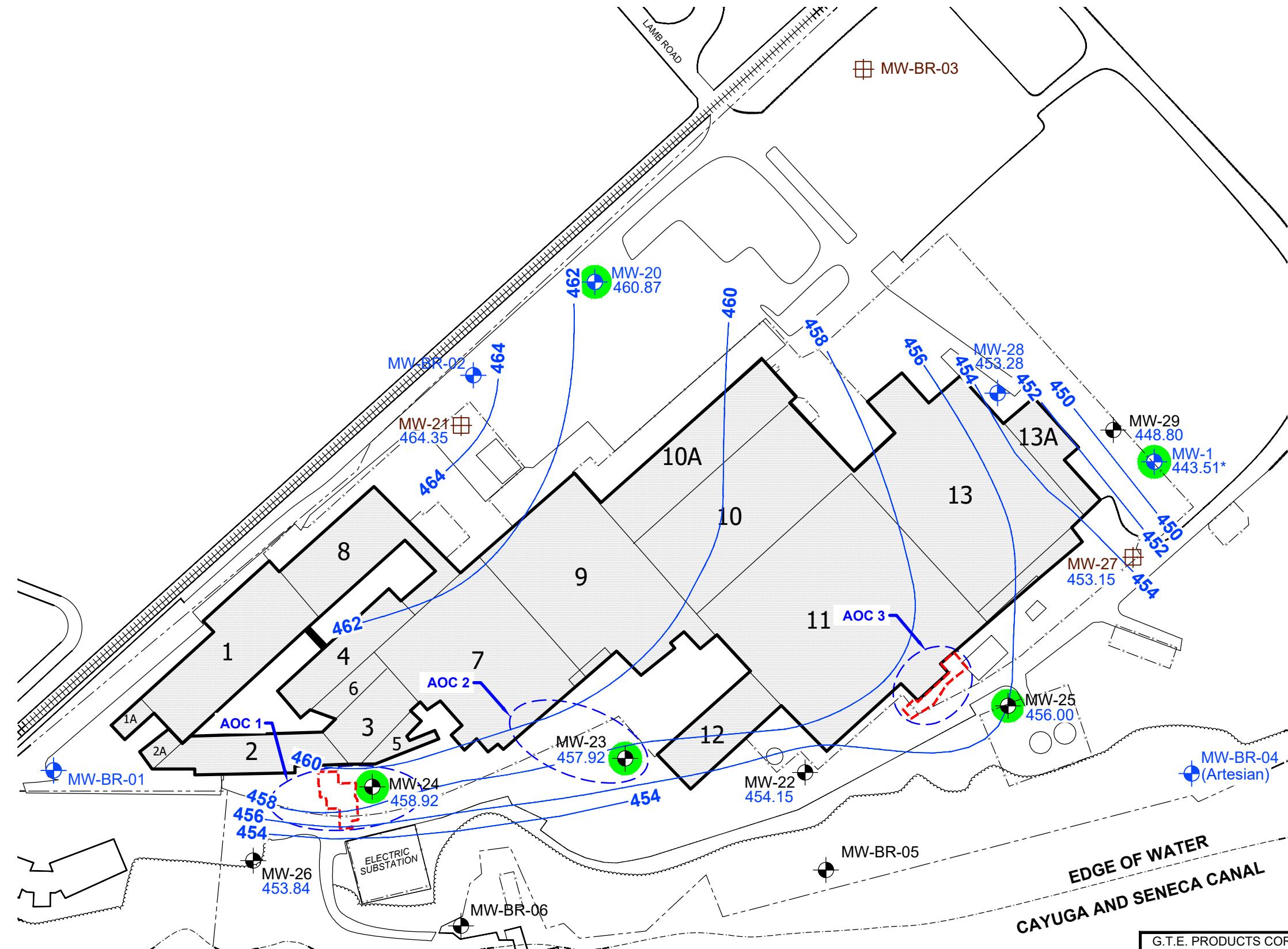
Figure 1 – Site Location Map

Figure 2 – Proposed PFAS and 1,4-Dioxane Groundwater Sampling Locations



G.T.E. PRODUCTS CORPORATION, NYSDEC SITE NO. 850003
FORMER PHILIPS DISPLAY COMPONENTS FACILITY
SENECA FALLS, NEW YORK
PFAS and 1,4-DIOXANE GROUNDWATER SAMPLING WORK PLAN

SITE LOCATION



LEGEND

- MW-22  SEMI-ANNUAL MONITORING WELL
- MW-BR-02  ANNUAL MONITORING WELL
- MW-21  MONITORING WELL IN WHICH WATER LEVEL ONLY ARE MEASURED
- 10A BUILDING NUMBER

— — — — — PROPERTY BOUNDARY
— · · · · · EDGE OF WATER
~~~~~ EDGE OF TREE LINE  
453.84 GROUNDWATER ELEVATION  
**454** — GROUNDWATER CONTOUR

TRICHLOROETHENE  
SOURCE AREAS

AREA OF CONCERN

VEL 0 200'

OF WATER  
SENECA CANAL

OVERBURDEN GROUNDWATER  
POTENTIOMETRIC SURFACE  
CONTOURS FROM SEPTEMBER  
10-11, 2025.

G.T.E. PRODUCTS CORPORATION, NYSDEC SITE NO. 850003  
FORMER PHILIPS DISPLAY COMPONENTS FACILITY  
SENECA FALLS, NEW YORK  
PFAS and 1,4-DIOXANE GROUNDWATER SAMPLING WORK PLAN

## PROPOSED PFAS and 1,4-DIOXANE GROUNDWATER SAMPLING LOCATIONS

A horizontal graphic scale bar with a black line and a white line. The scale is marked at 0, 200', and 400'. Below the scale, the text "GRAPHIC SCALE" is centered.