July 13, 2026
Revised July 28, 2026

Mr. Edward Koppers
New York State Department of Environmental Conservation
625 Broadway, 12th Floor
Albany, New York 12204
Via email: edward.koppers@dec.ny.gov

RE: Supplemental Soil and Groundwater Investigation Work Plan
Richard L. Hanson Fire Training Center
4610 New York State Route 5, Mohawk, Montgomery County, New York
NYSDEC Site #B00138

Dear Mr. Koppers:

LaBella Associates, D.P.C. (LaBella) has prepared this letter to present a Supplemental Soil and Groundwater Investigation Work Plan for the property located at 4610 New York State Route 5 (NYS Route 5), Mohawk, Montgomery County, New York, hereinafter referred to as the "Site". The work plan is in response to a request by the New York State Department of Environmental Conservation (NYSDEC) and has been developed from information provided by NYSDEC. The scope of work will be performed under LaBella's NYSDEC Standby Investigation & Remediation (I&R) Services Contract number C100116.

1.0 SITE BACKGROUND

The Site consists of an individual parcel (65.2-19) totaling 12.00 acres and located northwest of New York State Route 5. The Site includes a single-story masonry block classroom building located on the southwest portion of the property and a multi-story concrete block fire-training tower situated on the western portion of the Site. A pond is located on the northern portion of the property.

The Site is situated in a rural area with residential homes located northeast and southwest. Undeveloped land is visible to the north, northwest, and east of the Site. Regional topography slopes from the Site towards the Mohawk River located east and south of the property. The Site buildings are serviced by an onsite drinking water well and septic system.

The property was purchased by the New York Central and Hudson River Railroad in 1891 and was reportedly used as a mining operation. A refueling station for the railroad may have also been located onsite. A partial transfer of the Site to Montgomery County occurred in July 1933 to reportedly widen the highway right-of-way for NYS Route 5 and Prame Road. Arthur and Agnes Peters purchased the Site in 1940 and was transferred to the Peters Oil Co., Inc. in January 1948. The Site was leased to the Gulf Oil Corporation in July 1948 and was utilized as a fueling station, truck stop, and diner. Montgomery County purchased the Site in 1970 and historically utilized the Site for highway truck storage and maintenance. The county constructed the Richard L. Hanson Fire Training Center and the former buildings were demolished. To date, the Site continues to operate as a fire training facility.

According to information contained in the NYSDEC's Environmental Restoration Record of Decision (ROD) dated March 2003, multiple petroleum bulk storage (PBS) tanks were historically onsite while the property was leased to Gulf Oil Corporation. The tanks included two (2) 20,000-gallon petroleum aboveground storage tanks (ASTs), one (1) 12,000-gallon petroleum AST, one (1) 12,000-gallon

solvent based liquid underground storage tank (UST), and one (1) 500-gallon heating oil UST. One (1) 1,000-gallon petroleum, presumed to be heating oil, UST was discovered and removed during a November 2001 site investigation.

NYSDEC Spill Numbers 96-06805 and 96-08496 were associated with the 500-gallon heating oil UST, related with the former maintenance garage, and the 12,000-gallon solvent based liquid UST, located approximately 300 feet northeast of the current fire training tower. These spill numbers were closed on March 24, 2008 and November 11, 1997 after investigations, respectively.

Montgomery County currently has one (1) 275-gallon heating oil AST, located along the southeast corner of the classroom building, to provide heating needs as necessary.

LaBella conducted a limited subsurface investigation in April 2025 that consisted of advancing nine (9) soil borings and installing five (5) 2-inch monitoring wells across the Site. Depth to groundwater ranged from 1.34 feet below top of casing (ft BTOC) to 6.21 ft BTOC. Based on the monitoring well gauging data, the groundwater flow beneath the Site was generally to the west northwest during the groundwater sampling event on April 28, 2025.

Soil and groundwater samples were analyzed for United States Environmental Protection Agency (USEPA) Method 1633 for the list of 40 PFAS compounds. PFOA was detected at three (3) soil borings and PFOS was detected at five (5) soil borings above Unrestricted Use guidance values but below the Commercial Use guidance values. PFOA was detected at three (3) monitoring wells and PFOS was detected at two (2) monitoring wells above the NYSDEC Guidelines.

Sediment and surface water samples were collected from the on-Site pond and analyzed for USEPA Method 1633. PFOA and PFOS were detected in the sediment sample and PFOS was detected in the surface water sample above the NYSDEC Guidelines.

2.0 COMMUNITY AIR MONITORING PLAN

In accordance with the New York State Department of Health (NYSDOH) Generic Community Air Monitoring Plan (CAMP), air monitoring for fugitive dust and organic vapors will be performed during ground intrusive activities. Two (2) CAMP stations will be utilized onsite by placing one upwind and one downwind of the work area. A copy of the CAMP is attached.

3.0 SUBSURFACE INVESTIGATION

3.1 Soil Boring and Monitoring Well Locations

It is required that LaBella notify the UDig NY one-call center prior to any intrusive earth work. LaBella will notify UDig NY to contact the appropriate utility service providers to mark out all utilities in the vicinity of the Site.

A limited geophysical survey will be performed to aid in determining the presence of underground utilities/features to clear proposed boring locations. The geophysical survey will be completed by LaBella prior to mobilizing onsite.

The geophysical survey will include the use of radio-frequency utility line locators, ground penetrating radar (GPR), and a hand-held electromagnetic metal detector. Instrument responses will be marked on the ground. In addition, a scaled figure will be produced which will identify the instrument response locations.

LaBella proposes the advancement of soil borings at a total of 42 locations at the Site. These locations have been selected based on property features and/or previously documented impacts.

The soil borings will be installed to a maximum depth of 15 feet below the existing grade or to groundwater, whichever is shallower. It is understood that each of the borings will be advanced via direct-push technology for the purpose of obtaining soil characterization and laboratory analyses. Up to five (5) locations will be advanced with hollow stem augers for the installation of groundwater monitoring wells. These locations will be screened with a handheld photo-ionization detector (PID) during borehole advancement with no soil samples collected or soil characterization. The attached **Figure 1** depicts locations of proposed soil borings and monitoring well locations.

3.2 Soil Characterization and Laboratory Analyses

Individual soil samples will be obtained from each of the 42 borings for field characterization and laboratory analysis by NYSDEC Commissioners Policy 51 (CP-51) listed VOCs using USEPA Method 8260, NYSDEC CP-51 listed SVOCs using USEPA Method 8270, and USEPA Method 1633A for the list of 40 PFAS compounds. Soil cores will be continuously collected, characterized, and field headspace screened with a PID calibrated to 100 parts per million (ppm) isobutylene calibrant gas prior to site activities.

Soil samples will be collected from the following three (3) depth intervals:

- 0”-2” below vegetative cover.
- 2”-12” below grade.
- Air/water interface (water table) as observed in borehole.

Additional samples may be collected if evidence of contamination is identified (i.e. elevated PID readings, odor, staining, etc.).

3.3 Monitoring Well Construction

The overburden monitoring wells will be installed cross-gradient to impacts encountered during the April 2025 investigation and near the southwest property boundary. Actual borehole locations will be determined in the field.

The overburden monitoring wells are anticipated to be constructed of 2-inch Schedule 40 Polyvinyl Chloride (PVC) casings with 5-10 feet sections of 0.010-inch slotted screen. A #2 well sand filter pack will be placed in the annulus to approximately 1 foot above the screen, followed by 2 feet of hydrated bentonite, and then grouted to the surface. Final screen length and slot-size will be dependent on field observations and depth of groundwater encountered. Each monitoring well will be completed as a flush-mounted well with a concrete pad. Monitoring wells will be constructed in general accordance with USEPA Design and Installation of Monitoring Wells Guidance and American Society for Testing and Materials (ASTM) D5092, as applicable.

A limited site survey will be performed in order to construct a scaled base map and determine the relative elevations of the groundwater monitoring well casings.

3.4 Monitoring Well Development

No earlier than 24 hours after installation, each of the five (5) monitoring wells will be developed using over-pumping and surging techniques to help remove fines from the well screen and to establish a hydraulic connection with the aquifer. Water quality parameters will be collected prior to development, after the removal of each well volume, and at the conclusion of development. Development will be complete once turbidity is measured at or below 50 NTU, after an hour of development, or after the removal of three (3) well volumes, whichever comes first.

3.5 Groundwater Sampling

At least one round of synoptic water levels will be collected from the ten (10) onsite monitoring wells, comprising of the five (5) newly installed monitoring wells and the five (5) monitoring wells installed in 2025. Groundwater samples from the newly installed and April 2025 monitoring wells will be collected using either low-flow or standard three (3) volume purge sampling techniques in accordance with the most current NYSDEC PFAS sampling guidelines. Groundwater parameters including pH, conductivity, oxidation-reduction potential (ORP), dissolved oxygen (DO), temperature, and turbidity will be recorded on groundwater sampling logs. All samples will be analyzed for CP-51 listed VOCs using USEPA Method 8260, NYSDEC CP-51 listed SVOCs using USEPA Method 8270, and PFAS using modified USEPA Method 1633A.

4.0 QUALITY ASSURANCE/QUALITY CONTROL

Quality assurance/quality control (QA/QC) sampling will include aqueous trip blanks for soil and groundwater samples and collection of blind duplicate samples at a frequency of one (1) per 20 for each media. As such, total of seven (7) blind duplicate samples are anticipated (six (6) soil and one (1) groundwater). Additionally, one soil (1) matrix spike/matrix spike duplicate (MS/MSD) sample and one (1) groundwater MS/MSD sample will be collected each day. Analysis of QA/QC samples will be for VOCs using USEPA Method 8260, NYSDEC CP-51 listed SVOCs using USEPA Method 8270, and PFAS using modified USEPA Method 1633A.

5.0 INVESTIGATION DERIVED WASTE & DECONTAMINATION

Soil cuttings, decontamination water, and purge water will be considered Investigation Derived Waste (IDW) and as such, will be containerized in a properly labeled, steel 55-gallon drum and be temporarily stored on the Site, near the training facility, pending analytical results. A subcontractor will be contracted to transport and dispose of the drums.

Decontamination of any non-dedicated equipment, such as interface probes and drill roads, will be performed using an Alconox® and potable water rinse between each boing.

6.0 SURFACE WATER/SEDIMENT SAMPLING

If requested by NYSDEC, one (1) surface water and one (1) sediment sample will be collected from the onsite pond located on the northern portion of the Site. The sample will be collected using a stainless-steel trowel and dip-cup. Samples will be analyzed for PFAS using modified USEPA Method 1633.

7.0 DRINKING WATER WELL SAMPLING

The drinking water well sample will be purged from a sink faucet in the classroom building for a minimum of five (5) minutes. Once the drinking water well has been purged, one (1) sample will be collected and analyzed for CP-51 listed VOCs using USEPA Method 8260, NYSDEC CP-51 listed SVOCs using USEPA Method 8270, and PFAS using modified USEPA Method 533.

8.0 REPORT OF FINDINGS

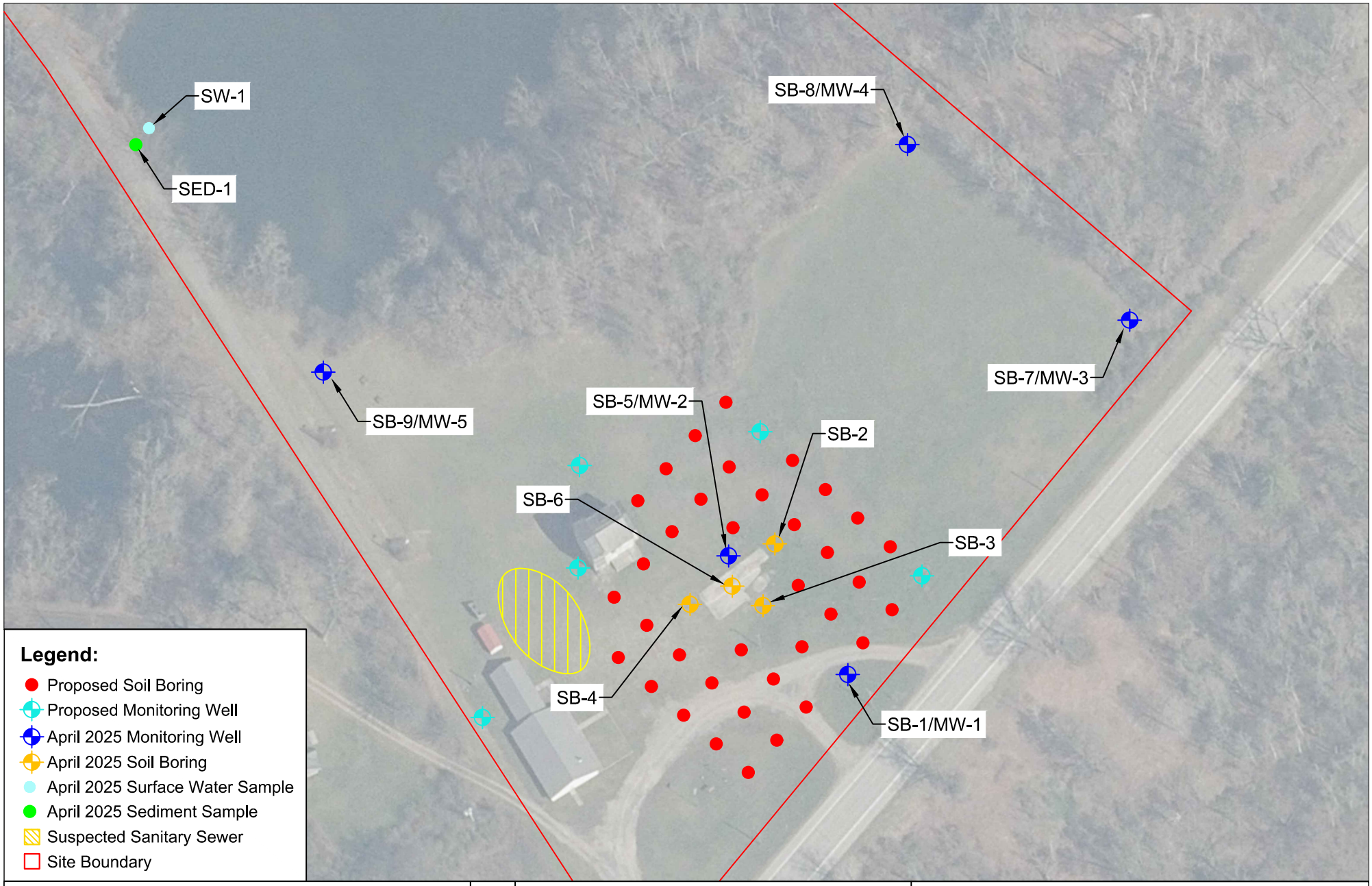
The data collected during this investigation will be presented in a summary report. The report will include supporting maps, drilling logs, laboratory analysis reports, methodologies, and recommendations as warranted.

Respectfully submitted,
LaBella Associates, D.P.C.



Sierra Vaverchak
Environmental Geologist

Attachments
Figure 1 – Proposed Soil Borings / Monitoring Well Locations
Community Air Monitoring Plan



LaBella
Powered by partnership.

FIGURE 1
Proposed Sample Locations

Date: July 2026

Scale: 1" = 100' (approximate)
0 25 50 100

Richard L. Hanson
Fire Training Center
4610 NYS Route 5, Mohawk, NY
Montgomery County
NYSDEC Site # B00138

Community Air Monitoring Plan

Location:

Richard L. Hanson Fire Training Center
4610 New York State Route 5
Mohawk, Montgomery County, New York
NYSDEC Site #B00138

Prepared for:

Mr. Edward Koppers
NYSDEC
625 Broadway, 12th Floor
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LaBella Project No. 2234026.143

July 13, 2026

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Community Air Monitoring Plan

1.0 General

LaBella will implement the site-specific Community Air Monitoring Plan (CAMP) during all ground intrusive activities. Monitoring for ambient particulate and organic vapor monitoring will be conducted during all ground-intrusive work and other field activities that have the potential to generate air emissions including, but not limited to:

- Overburden and bedrock drilling;
- Installation of monitoring wells;
- Material handling (e.g., offloading of materials, and loading of materials for transport to an off-site disposal facility); and
- Other ancillary intrusive activities.

Particulates will be continuously monitored upwind and downwind as specified within the Work Plan. In general, particulate monitoring will consist of:

- If particulate PM-10 levels are 100 µg/m3 above background (upwind) for the 15-minute Time Weighted Average (TWA) or if dust is observed leaving the work area dust suppression must be employed. Work can continue concurrent with dust suppression so long as levels do not exceed 150 µg/m3 above the TWA.
- If particulate PM-10 levels are 150 µg/m3 above background (upwind) for the TWA work must be stopped and a re-evaluation of activities initiated. Work can resume if dust suppression measures and other controls are successful in reducing the downwind PM-10particulate concentration to within 150 µg/m3 of the upwind level and in preventing visible dust migration.
- All readings must be recorded and be available for State (DEC and NYSDOH) personnel to review.

The CAMP will include the following elements:

1. Ambient dust will be monitored using two (2) aerosol/dust meters; one (1) upwind and one (1) downwind.
2. Volatile organics will be monitored by two (2) PID meters (in conjunction with the dust meters)
3. Meteorological Weather Data will be obtained from the local weather station via the internet.

2.0 Ambient Dust

Ambient dust/particulate monitoring will be performed using an aerosol/dust meter (TSI 8530 Dust Trak II or equivalent) and will monitor particulate matter in a range of 0 – 10 microns diameter (PM-10). Dust monitoring shall be performed when Site activities have the potential to disturb soils or create dust which may contain contaminates of concern (COCs). Dust monitoring will be waived on days where precipitation prevents dust migration.

3.0 Volatile Organics

Volatile Organic and Semi-Volatile Organic compounds (VOCs and SVOCs) vapors will be monitored continuously during intrusive Site activities using a MiniRae 3000 (or equivalent) photo ionization detector (PID). In correspondence with the NYSDOH Generic CAMP:

- If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

- If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.
- If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.
- All 15-minute readings must be recorded and be available for State (DEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

Exceedances of CAMP levels and corrective measures taken must be reported to NYSDEC and NYSDOH project managers, within 24 hours of occurring in addition to inclusion in Daily Reports.

4.0 VOC and Dust Control Measures

During times of Site monitoring, action levels may be observed. At those times control measures will be required to rectify the problematic exceedance. Typical VOC and Dust control measures may include:

- Apply water for dust suppression;
- Relocate operations, if applicable; and,
- Slow the pace of the excavation/drilling of material processing.