

Via Electronic Mail

September 29, 2025



Revised October 9, 2025

Justin Starr, P.G.
New York State Department of Environmental Conservation
Division of Environmental Remediation, Remedial Bureau C
625 Broadway, 12th Floor
Albany, NY 12233-7014

Re: Pre-Design Investigation Report – Response to NYSDEC Comments
Buick Dealership/Cleaners/Gas Station Site
NYSDEC Site No. C360129

Dear Mr. Starr:

On behalf of the White Plains Hospital Medical Center (WPH), Woodard & Curran Engineering and Geological Services P.A. P.C. (Woodard & Curran) is pleased to submit the following responses to the NYSDEC's May 20, 2025 comment letter on the Pre-Design Investigation (PDI) Report submitted to the NYSDEC in April 2025. The PDI Report was submitted in support of preparing of a Remedial Action Work Plan to address ground water contamination at the Buick Dealership/Cleaners/Gas Station Site (NYSDEC Site No. C360129) located on West Post Road, White Plains, New York (herein referred to as the "Site").

The May 20, 2025 NYSDEC comment letter contained five comments. Comments 1, 2, 3, and 5 will be addressed in a revised PDI report to be submitted to the NYSDEC. A response to Comment #4 is the subject of this letter. Specifically, Comment #4 stated the following:

4. Section 6.1 Next Steps: *This section describes IRM implementation in the RB-50 area of the site. This portion of the site historically contained significant concentrations of chlorinated volatile organic compounds (cVOCs). Since the most recent sampling of the impacted depth intervals are considered stale (sampling completed circa 2014), additional samples should be collected at the appropriate depths to update the conceptual site model and best inform the IRM. In addition, if significant concentrations of cVOCs are observed at the bedrock interface, additional characterization in the bedrock may be required. Please revise.*

As we have discussed, WPH intends to complete the requested additional ground water delineation in the vicinity of RB-50, with specific emphasis on collecting ground water samples at the bedrock/overburden interface. Also as discussed, Woodard & Curran is proposing to use the WATERLOO Aquifer Profiling System (Waterloo APS) to vertically delineate the chlorinated volatile organic compounds (cVOCs) previously detected ground water at RB-50. The NYSDEC requested that Woodard & Curran provide a brief scope of work for implementing the Waterloo APS, which is provided below.



PROPOSED WATERLOO APS SCOPE OF WORK

Task 1 – Utility Clearance

Prior to initiating any field activities, subsurface features and structures will be located and mapped to clear potential drilling locations and to investigate the potential for preferential pathways (e.g., utility corridors). Utility clearance will be conducted in two stages. Stage one will be conducted by public utility companies through the Dig Safely New York hotline. Stage two will be conducted by a private utility locating company to clear potential drilling locations.

Task 2 – Ground Water Investigation (Waterloo APS)

Following the utility clearance and survey, high resolution continuous ground water profiling of the overburden aquifer will be completed using a direct-push drill rig and the Waterloo APS. The Waterloo APS is an integrated injection-flow logging and discreet interval ground water sampling tool that is driven into unconsolidated soils using direct-push rods. The Waterloo APS sampling tip is threaded into a hollow drill rod, with a nitrogen gas-driven positive displacement bladder pump utilized to purge ground water from an approximate two-inch diameter downhole sampling point through connected 1/8-inch stainless steel tubing for collection of discrete ground water samples during drilling activities. The aboveground components of the Waterloo APS tool include a multiparameter water-quality meter used to measure pH, temperature, oxidation-reduction potential (ORP), conductivity, and turbidity of the purged groundwater, with an associated sensor and laptop computer to measure and log hydraulic conductivity. The sampling tip and stainless-steel sample tubing will be decontaminated between each boring location. A total of nine Waterloo APS locations are proposed to delineate ground water concentrations of cVOCs in the vicinity of RB-50 (see Figure 1). One Waterloo APS boring will be advanced on the former RB-50 location, and two Waterloo APS locations will be advanced to the north, south, east and west of RB-50 with each location spread about five to ten feet apart, depending on field conditions.

During the implementation of proposed Waterloo APS scope of work, CAMP monitoring, QA/QC requirements and other applicable aspects of the October 2023 PDI Work Plan will be followed and documented.

Task 3 – Supplemental Well Installation

Following the Waterloo APS investigation and after the laboratory data is received and reviewed, up to four permanent monitoring wells at varying depths will be installed at Waterloo APS locations that exhibit the highest concentrations of cVOCs. *In consultation with NYSDEC, additional downgradient monitoring wells may be considered to evaluate the potential for off-site contaminant migration.* Monitoring wells will be constructed with five feet of well screen and will be screened based the highest cVOCs concentrations within the water column. Following well installation, ground water monitoring wells will be developed to remove accumulated sediments and establish communication with the surrounding aquifer. If groundwater data indicates cVOCs above the Ambient Water Quality Standards (AWQS) at the bedrock interface, we will notify the NYSDEC to determine if additional vertical delineation into the bedrock is necessary.



All investigation derived waste (IDW) including drill cuttings and development/purge water will be containerized in 55-gallon drums and staged at the Sites pending characterization.

At the completion of all field activities, groundwater monitoring wells, and Waterloo APS locations will be surveyed by a NYS licensed Surveyor.

Task 4 – Laboratory Analysis

During the Waterloo APS drilling activities, discrete ground water samples will be collected approximately every five feet beginning at the water table until refusal at the bedrock surface is reached. Samples will be collected utilizing low-flow sampling techniques, in accordance with NYSDEC DER-10 protocols. Geochemical parameters such as pH, temperature, ORP, conductivity, and turbidity will be recorded at constant volume intervals, generally 100 milliliters (ml), with a multiparameter sonde. Stability for sampling is defined as three consecutive readings with each parameter varying by less than 10 percent. Monitoring of parameters for stabilization will occur after the water in the stainless steel lines is purged. Once stabilization criteria have been met, ground water samples will be collected and submitted under chain-of-custody protocols to NELAP certified laboratory for analysis of cVOCs via USEPA Method 8260. The ground water investigation data will be used to refine the Conceptual Site Model (CSM) and for assessment of relative hydraulic permeability characteristics, which will support the selection and refinement of a remedial alternative to address contaminated ground water in overburden/shallow ground water. Approximately 45 discrete intervals from the proposed 9 Waterloo APS locations will be sampled. Sampling will include four ground water samples from the newly installed monitoring wells.

QA/QC samples, including trip blanks, field equipment blanks and duplicates will also be collected for laboratory analysis.

Task 5 – Third Party Data Validation

As with the data collected in the previously submitted PDI Report, the newly collected data will be reviewed by a third-party independent data validation contractor (Laboratory Data Consultants, Inc., of Carlsbad, California) in general accordance with the NYSDEC DUSR guidelines and USEPA Contract Laboratory Program National Functional Data Validation Standard Operating Procedures for Data Evaluation and Validation. Data validation criteria that will be reviewed for representative samples will include: sampling and analysis date, sample custody, holding times, sample handling and preservation procedures, field blank results, field and laboratory duplicate sample results, surrogate recoveries, matrix spike/matrix spike duplicate results, laboratory control standards, laboratory method blanks, lot assignment reports and miscellaneous observations. Based on these results, data that do not meet performance criteria will be flagged with qualifiers describing the data's usability.

Task 6 – Data Evaluation and Reporting

Following completion of field activities, all data will be evaluated and interpreted for the purposes of preparing a revised PDI Report. The revised PDI Report will include the information in the April 2025 PDI Report, supplemented with the data collected during the additional PDI scope of work described herein.



We anticipate the following schedule to be initiated upon approval of this scope of work:

TASK	DURATION	APPROXIMATE DATES
Contracting/Site Coordination	Two Weeks	Oct 20, 2025 – Nov 3, 2025
Utility Clearance	One Week	Nov 3, 2025 – Nov 10, 2025
Conduct Field Work	Three Weeks	Nov 10, 2025 – Dec 1 2025
Laboratory Analysis and Data Evaluation	Three Weeks	Dec 1, 2025 – Dec 22, 2025
Well Installation & Sampling	Two Weeks	Jan 12, 2026 – Jan 26, 2026
Laboratory Analysis and Data Evaluation	Three Weeks	Jan 26, 2026 – Feb 16, 2026
Determine need for Additional Monitoring Wells, if Needed	Two Weeks	Feb16, 2026 – Mar 2, 2026
Laboratory Analysis and Data Evaluation, if Needed	Three Weeks	Mar 2, 2026 – Mar 23, 2026
Revise PDI and Submit to NYSDEC	Four Weeks	Mar 23, 2026 – Apr 20, 2026

We appreciate your review of this Scope of Work. If you have any questions or require any additional information, please do not hesitate to contact me at 914-294-2608.

Sincerely,
WOODARD & CURRAN ENGINEERING AND GEOLOGICAL SERVICES P.A.P.C.

Michael van der Heijden, LSRP
Senior Project Manager

cc: Joseph Mannino, White Plains Hospital
Joseph Perrillo, White Plains Hospital
Linda Shaw, Knauf Shaw

Figure Exported: 8/4/2025 By: Anthony Casale Using: I:\work\shared\Projects\0214155\04 WP Hospital 25 West Post Rd ESA\Info\GIS\Projects\PDI Investigation\Grid Site (Project 7)\PDI Report\Fig X - Exceedance Overview.aprx Layout: Standard 11x17 L Side2



Proposed Waterloo / Well Installation Map

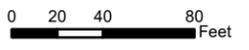
West Post Road
White Plains, New York



Legend

- PDI Temporary Well (Nov 2023)
- Sheet1_XYTableToPoint3
- Monitoring Well
- Supplemental Remedial Investigation Boring
- Historical Boring
- MIHPT Boring Location
- Approximate Site Boundary
- Site Parcels
- Proposed Waterloo / Well Installation Location
- Proposed Waterloo Location
- Historical RB-50 sample location area

Note: Well installation location are subject to change.



Project #: 0214155
Map Created: August 2025

Third Party GIS Disclaimer: This map is for reference and graphical purposes only and should not be relied upon by third parties for any legal decisions. Any reliance upon the map or data contained herein shall be at the users' sole risk. **Data Sources:**

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