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Butler, NJ 07405
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March 16, 2022

Mr. Matthew Hubicki
Project Manager, Remedial Bureau C
Division of Environmental Remediation
New York State Department of Environmental Conservation (NYSDEC)
625 Broadway
Albany, NY 12233-7014

Re: NYSDEC Site No. 360174
Supplemental Investigation – Northern Parcel/11 New King Street Westchester County Airport
240 Airport Road
White Plains, New York

Dear Mr. Hubicki:

This letter has been prepared in response to the New York State Department of Environment Conservation's (NYSDEC) December 5, 2021 letter (Attachment 1) submitted to Westchester County Department of Public Works and Transportation (WCDPW) requesting an Off-site Investigation to further delineate the extent of per-polyfluorinated alkyl substance (PFAS) impacts in environmental media. Accordingly, First Environment, on behalf of Westchester County, will perform additional soil, sediment, groundwater, and surface water sampling for PFAS in the northern parcel near New King Street and downgradient of the New King Street property. The samples will be submitted to York Laboratories, a certified laboratory for analysis.

Background

In March 2021, First Environment submitted a Site Characterization Report to the NYSDEC describing the findings identified at the Airport property. Based on the results and as detailed in the report, the highest levels of PFAS in soil, surface water, and groundwater were identified between Building 10 and the former New York Air National Guard (NYANG) Burn Pit. This is the same area where the abandonment and replacement of the Outfall 7 (OF-7) stormwater collection system was conducted to mitigate PFAS from leaving the storm sewer at OF-7. The site characterization further identified that surface water from OF-7 containing PFAS has migrated downgradient past New King Street; therefore, the NYSDEC requested a supplemental investigation at the northern parcel of the Airport property as requested in the NYSDEC's May 20, 2021 letter to the WCDPW (Attachment 2).

First Environment executed the previously submitted scope-of-work to sample soil and sediment in the northern parcel near New King Street on July 7, 2021, with follow-up delineation samples collected on August 17, 2021. The soil samples were collected from the top two inches of soil, immediately below any vegetative or asphaltic cover. The sediment samples were collected from below the surface water of the stream located downgradient of OF-7 on Airport property.

The results of the sampling events revealed Perfluorooctane sulfonic acid (PFOS) concentrations of 22.4 parts per billion (ppb), 26.5 ppb, 26.6 ppb, 70.4 ppb, up to 133 ppb (diluted). Perfluorooctonic acid (PFOA) was also detected at low levels from non-detect (ND) to 2.1 ppb. Based upon the results of this recent investigation, the NYSDEC has requested further delineation of the PFAS in soil, sediment, and groundwater as required under the Brownfield Cleanup Program. A summary of the laboratory analyses obtained during completion of the first workplan is provided on Table 1. The sampling locations and analytical results are also provided on Figure 1, including the proposed locations for additional sampling and analysis. The most recent results from surface water sampling at locations Outfall 7 (OF-7) and E-10 have also been included in Table 1 and Figure 1 for reference.

It should be noted that all results were below the guidance values for the soil cleanup objectives (SCO) for commercial use of 500 ppb for PFOS and 440 ppb for PFOA, as referenced in the June 2021 NYSDEC guidance. However, it should also be noted that these results are above the SCO for protection of groundwater which are 3.7 ppb for PFOS and 1.1 ppb for PFOA.

Scope-of-Work

In response to discussions with the NYSDEC subsequent to its December 5, 2021 letter and previous sample events, First Environment has prepared this scope-of-work to sample soil, sediment, and groundwater, as well as surface water as illustrated on Figure 1. Prior to initiating any on-site intrusive activities, First Environment, or its subcontractors, will complete the required public utility mark-out and notifications.

The soil samples will be collected from the top two inches of soil, immediately below any vegetative or asphaltic cover with the exception of the samples around New King Street 4. In those locations, there will be three samples collected from 0-2 inches, 6 to 12 inches, and from the interval six inches above the water table. The sediment samples will be collected from below the surface water of the stream that is downgradient of OF-7 on Airport property. In total, nine soil samples, seven sediment, four groundwater, and a total of six surface water samples will be collected should water be present at the time of sampling. Two of the surface water samples will be collected at OF-7 and E-10, while the remaining samples will be collected at the locations noted on Figure 1. All samples will be submitted for PFAS analysis to a certified laboratory using EPA method 537.1. Additionally, SPLP analysis would be performed on those vertical soil samples that meet or exceed the

NYSDEC protection of groundwater PFOS and PFOA guidance values located six inches above the water table to evaluate the leachability of PFOS and PFOA in soil to groundwater. As noted, the proposed sampling locations are illustrated on Figure 1.

First Environment will retain a drilling subcontractor to install temporary pre-packed wells (TW) at five locations as shown in Figure 1. A First Environment geologist will select the locations where drilling will occur. A 7822 track-mounted Geoprobe® will be used to perform drilling at the specified locations. The sample equipment used to collect samples will consist of steel dual-tube DT-21/22 sampling technology to an estimated depth of 10.0 to 15.0 feet below ground surface (bgs). A Macrocore barrel sampler will be used with a PVC liner to collect the soil samples continuously as the steel dual-tube casing is advanced. Once the target depth has been reached, the soil boring will be terminated and converted to a temporary monitoring well as specified below. The soil will be classified using the Unified Soil Classification System (USCS) and recorded in a field book by a First Environment geologist. Furthermore, the soil will be field screened using a properly calibrated Photoionization Detector (PID).

One groundwater sample will be collected at each temporary well location and submitted to a certified laboratory for analysis for PFAS. Before the dual-tube casing is removed from the borehole, a temporary one-inch well will be installed using pre-packed well screen. The purpose of this type of screen is to reduce fine-silt and sand from becoming entrained in the groundwater such that a representative sample can be collected. If necessary, a peristaltic pump may be used to develop the temporary well to reduce turbidity before collecting a groundwater sample for laboratory analysis. Once turbidity is reduced, a groundwater sample will be collected for laboratory analysis and submitted to a certified laboratory.

Once collected, the samples will be placed in PFAS free sample bottles and transported to the laboratory following all appropriate sample collection methods of the NYSDEC January 2021 Sampling, Analysis, and Assessment of Per-Polyfluorinated Alkyl Substances. Sampling will be conducted as described in First Environment's previously submitted Quality Assurance Project Plan (QAPP). It is not anticipated that any permits, air monitoring, or waste disposal will be required. The soil and sediment sample locations are provided in Figure 1. Table 2 outlines the sampling schedule.

First Environment will also follow all applicable provisions of our site-specific health and safety plan (HASP) in accordance with NYSDEC guidance (DER-10), incorporating the task to be completed as outlined in this work plan. The HASP is a requirement of the federal Occupational Safety and Health Administration (OSHA) and is not subject to the approval of NYSDEC.

If you have any questions, please do not hesitate to call.

Regards,

FIRST ENVIRONMENT, INC.

Scott R. Green, P.G.
Director, Insurance ConsultingService Group

David Luer
Project Manager/Field Team Leader

Att.

c: B. Tod Delaney, Ph.D., P.E., First Environment, Inc.
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L. Schmidt
J. Brown
J. Carpenter
K. Kulow - NYSDOH

TABLES

TABLE 1
PFAS Soil and Sediment Sampling
Laboratory Results

Sample ID York ID Sampling Date Client Matrix		Commercial Soil Cleanup Objectives	Restricted Residential Soil Cleanup Objectives	Protection of Groundwater Soil Cleanup Objectives	NEW KING SOIL-1 21G0425-01 7/7/2021 10:00:00 AM Soil		NEW KING SOIL-2 21G0425-02 7/7/2021 10:20:00 AM Soil		NEW KING SED-1 21G0425-03 7/7/2021 10:25:00 AM Soil		NEW KING SOIL-3 21G0425-04 7/7/2021 10:45:00 AM Soil		FIELD DUP - NEW KING SOIL-3 21G0425-05 7/7/2021 3:00:00 PM Soil		NEW KING SOIL-4 21G0425-07 7/7/2021 11:05:00 AM Soil		SOIL 4R 21H0813-01 8/17/2021 11:00:00 AM Soil		FIELD DUP. (SOIL 4R) 21H0813-02 8/17/2021 11:00:00 AM Soil	
Compound	**CAS Number**	**As of June, 2021**	**As of June, 2021**	**As of June, 2021**	Result	Q	Result	Q	Result	Q	Result	Q	Result	Q	Result	Q	Result	Q	Result	Q
Total Solids					%		%		%		%		%		%		%		%	
Dilution Factor					1		1		1		1		1		1		1		1	
% Solids	solids				71.100		78.400		81.500		74		74.300		41.800		54.800		50.700	
PFAS, NYSDEC Target List					ug/kg		ug/kg		ug/kg		ug/kg		ug/kg		ug/kg		ug/kg		ug/kg	
Dilution Factor					1		1		1		1		1		2		1		5	
1H,1H,2H,2H-Perfluorodecanesulfonic acid (8:2 FTS)	39108-34-4				0.327	U	0.9		1.56		0.308	U	0.33	U	0.569	U	0.372	U	0.465	U
1H,1H,2H,2H-Perfluorooctanesulfonic acid (6:2 FTS)	27619-97-2				0.327	U	1.01		1.22		0.308	U	0.33	U	0.569	U	0.372	U	0.465	U
N-EtFOSAA	2991-50-6				0.327	U	0.304	U	0.291	U	0.308	U	0.33	U	0.569	U	0.372	U	0.465	U
N-MeFOSAA	2355-31-9				0.327	U	0.304	U	0.291	U	0.308	U	0.33	U	0.569	U	0.372	U	0.465	U
Perfluoro-1-decanesulfonic acid (PFDS)	335-77-3				0.327	U	0.304	U	0.291	U	0.308	U	0.33	U	0.569	U	0.372	U	0.465	U
Perfluoro-1-heptanesulfonic acid (PFHpS)	375-92-8				0.327	U	0.304	U	0.291	U	0.308	U	0.33	U	0.82		0.372	U	0.663	
Perfluoro-1-octanesulfonamide (FOSA)	754-91-6				0.327	U	0.304	U	0.291	U	0.308	U	0.33	U	0.569	U	0.372	U	0.465	U
Perfluorobutanesulfonic acid (PFBS)	375-73-5				0.327	U	0.304	U	0.291	U	0.308	U	0.33	U	0.569	U	0.372	U	0.465	U
Perfluorodecanoic acid (PFDA)	335-76-2				0.327	U	0.304	U	0.291	U	0.308	U	0.33	U	2.2		0.672		2.3	
Perfluorododecanoic acid (PFDoA)	307-55-1				0.327	U	0.304	U	0.291	U	0.308	U	0.33	U	0.569	U	0.372	U	0.465	U
Perfluoroheptanoic acid (PFHpA)	375-85-9				0.327	U	0.304	U	0.291	U	0.308	U	0.33	U	0.614		0.372	U	0.763	
Perfluorohexanesulfonic acid (PFHxS)	355-46-4				0.327	U	0.371		0.291	U	0.308	U	0.33	U	6.23		1.09		4.1	
Perfluorohexanoic acid (PFHxA)	307-24-4				0.327	U	0.304	U	0.291	U	0.308	U	0.33	U	0.883		0.372	U	1.06	
Perfluoro-n-butanoic acid (PFBA)	375-22-4				1.65		0.304	U	0.291	U	1.49		1.38		5.54		0.525		7.74	
Perfluorononanoic acid (PFNA)	375-95-1				0.327	U	0.304	U	0.291	U	0.308	U	0.368		15		3.16		13.5	
Perfluorooctanesulfonic acid (PFOS)	1763-23-1	440	44	3.7	0.967		4.95		3.21		1.12		1.27		133	D	26.5		110	D
Perfluorooctanoic acid (PFOA)	335-67-1	500	33	1.1	0.327	U	0.324		0.291	U	0.411		0.73		0.947		0.372	U	0.968	
Perfluoropentanoic acid (PFPeA)	2706-90-3				0.327	U	0.304	U	0.291	U	0.308	U	0.33	U	0.797		0.659		1.57	
Perfluorotetradecanoic acid (PFTA)	376-06-7				0.327	U	0.304	U	0.291	U	0.308	U	0.33	U	0.569	U	0.372	U	0.465	U
Perfluorotridecanoic acid (PFTrDA)	72629-94-8				0.412		0.762		0.788		0.308	U	0.33	U	1.67		0.435		1.05	
Perfluoroundecanoic acid (PFUnA)	2058-94-8				0.4		0.622		0.665		0.311		0.373		3.86		1.31		3.61	

Q is the Qualifier Column with definitions as follows:
D=result is from an analysis that required a dilution
J=analyte detected at or above the MDL (method detection limit) but below the RL (Reporting Limit) - data is estimated
U=analyte not detected at or above the level indicated
B=analyte found in the analysis batch blank
E=result is estimated and cannot be accurately reported due to levels encountered or interferences
NT=this indicates the analyte was not a target for this sample
Note: the soil reference levels are guidance values established by the NYSDEC.

TABLE 1
PFAS Soil and Sediment Sampling
Laboratory Results

Sample ID		Commercial	Restricted	Protection	SOIL 4W		SOIL 4S		SOIL 4N		OF-7		E-10	
York ID		Soil	Residential	of Groundwater	21H0813-03		21H0813-04		21H0813-05		20K0129-10		20J0104-02	
Sampling Date		Cleanup	Soil Cleanup	Soil Cleanup	8/17/2021 11:15:00 AM		8/17/2021 11:30:00 AM		8/17/2021 11:45:00 AM		11/2/2020 1:10:00 PM		10/1/2020 11:00:00 AM	
Client Matrix		Objectives	Objectives	Objectives	Soil		Soil		Soil		Water		Water	
Compound	**CAS Number**	**As of June, 2021**	**As of June, 2021**	**As of June, 2021**	Result	Q	Result	Q	Result	Q	Result	Q	Result	Q
Total Solids					%		%		%					
Dilution Factor					1		1		1					
% Solids	solids				64.300		56		61.700		NT		NT	
PFAS, NYSDEC Target List					ug/kg		ug/kg		ug/kg		ng/L		ng/L	
Dilution Factor					1		1		1		10		5	
1H,1H,2H,2H-Perfluorodecanesulfonic acid (8:2 FTS)	39108-34-4				0.371	U	0.416	U	0.399	U	24.3	D	2	U
1H,1H,2H,2H-Perfluorooctanesulfonic acid (6:2 FTS)	27619-97-2				0.371	U	0.416	U	0.399	U	329	D	80.7	
N-EtFOSAA	2991-50-6				0.371	U	0.416	U	0.399	U		U	2	U
N-MeFOSAA	2355-31-9				0.371	U	0.416	U	0.399	U		U	2	U
Perfluoro-1-decanesulfonic acid (PFDS)	335-77-3				0.371	U	0.416	U	0.399	U		U	2	U
Perfluoro-1-heptanesulfonic acid (PFHpS)	375-92-8				0.371	U	0.416	U	0.399	U	37.1	D	34.2	
Perfluoro-1-octanesulfonamide (FOSA)	754-91-6				0.371	U	0.416	U	0.399	U		U	3.78	
Perfluorobutanesulfonic acid (PFBS)	375-73-5				0.371	U	0.416	U	0.399	U	62.1	D	42.8	
Perfluorodecanoic acid (PFDA)	335-76-2				1.41		1.17		0.447			U	3.01	
Perfluorododecanoic acid (PFDoA)	307-55-1				0.371	U	1.56		0.399	U		U	2	U
Perfluoroheptanoic acid (PFHpA)	375-85-9				0.533		1		0.399	U	167	D	108	
Perfluorohexanesulfonic acid (PFHxS)	355-46-4				2.14		1.74		1.46		1070	D	619	D
Perfluorohexanoic acid (PFHxA)	307-24-4				0.721		1.05		0.399	U	300	D	157	
Perfluoro-n-butanoic acid (PFBA)	375-22-4				2.43		2.98		2.13		102	D	55.4	
Perfluorononanoic acid (PFNA)	375-95-1				8.08		3.6		3.09		108	D	66	
Perfluorooctanesulfonic acid (PFOS)	1763-23-1	440	44	3.7	70.4		22.4		26.6		2010	D	1210	D
Perfluorooctanoic acid (PFOA)	335-67-1	500	33	1.1	0.571		2.08		0.399	U	389	D	204	D
Perfluoropentanoic acid (PFPeA)	2706-90-3				0.737		2.24		0.425		393	D	225	
Perfluorotetradecanoic acid (PFTA)	376-06-7				0.371	U	0.578		0.399	U		U	2	U
Perfluorotridecanoic acid (PFTrDA)	72629-94-8				0.396		2.59		0.792			U	2	U
Perfluoroundecanoic acid (PFUnA)	2058-94-8				1.7		2.51		0.768		16.1	D	4.87	

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B=analyte found in the analysis batch blank
E=result is estimated and cannot be accurately reported due to levels encountered or interferences
NT=this indicates the analyte was not a target for this sample
Note: the soil reference levels are guidance values established by the NYSDEC.

TABLE 2

Site Investigation 2022
Work Activity
Schedule

Milestone	Estimated Duration	Estimated Completion Date	Estimated Completion Percentage
Sampling Northern Parcel	2 days	April 22	0%
Report Submittal*	-	June 10	0%

*Report submittal will be provided in the monthly status report submitted in March if the results are received from the laboratory, otherwise they will be reported in the following monthly status report. The results will be incorporated in the Final Remedial Investigation Report

FIGURES

TRIB 2 SW
TRIB 2 SED
TRIB 2 GW
NKS 2 GW
NKS 2 SOIL
NKS 2 SW
NKS 2 SED
New King Sed 1
PFOS: 3.2
PFOA: ND
New King Soil 2
PFOS: 5.0
PFOA: 0.3
New King Soil 1
PFOS: 1.0
PFOA: ND
TRIB 1 SW
TRIB 1 SED
TRIB 1 GW
Soil 4N
PFOS: 26.6
PFOA: ND
4D SOIL
Soil 4S
PFOS: 22.4
PFOA: 2.1
4C SOIL
4 GW
4A SOIL
New King Soil 4
PFOS: 133 D
PFOA: 0.9
Soil 4R
PFOS: 26.5
PFOA: ND
4B SOIL
Soil 4W
PFOS: 70.4
PFOA: 0.6
E-10 SOIL
E-10 SED
E-10 SW
ES SED
ES SW
ES SOIL
OF-7 SW
SPDES OUTFALL NO. 007
New King Soil 3
PFOS: 1.1
PFOA: 0.4
E-10 DS SOIL
E-10 DS SED
ES DS SOIL
ES DS SED
ES DS GW

Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Legend

- Outfall Location
- Proposed Surface Soil Sample Location
- Proposed Sediment Sample Location
- Proposed Surface Water Sample Location
- Proposed Shallow Groundwater Sample Location
- Former Soil Sample Locations
- Former Surface Water Sample Locations
- Stream
- Ephemeral Stream
- Airport Property Boundary

Notes
ES Ephemeral Stream
DS Down Stream
NKS New King Street
TRIB Tributary
OF Ooutfall

0 25 50 100 Feet
1 inch = 100 feet

N

FIRST ENVIRONMENT
10 Park Place, Bldg 1A, Suite 504
Butler, NJ 07405

NYSDEC SITE NO. 360174
WESTCHESTER COUNTY AIRPORT
White Plains, Westchester County, New York
FIGURE 1
PROPOSED SAMPLING LOCATIONS - NORTH END

Revised	Drawn	Checked	Approved	Date
	LS	DL	SG	3/15/2022

I:\WESCHESTERAIRPORT\GIS\North End Sampling.mxd

ATTACHMENT 1

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau C
625 Broadway, 12th Floor, Albany, NY 12233-7014
P: (518) 402-9662 I F: (518) 402-9679
www.dec.ny.gov

Transmitted via E-mail

December 6, 2021

Commissioner Hugh Greechan, Jr., P.E.
County of Westchester
Westchester County Department of Public Works and Transportation
148 Martine Avenue, 5th Floor
White Plains, New York 10601
Hjg7@westchestergov.com

Scott Green, P.G.
First Environment, Inc.
10 Park Place
Building 1A, Suite 504
Butler, NJ 07405
sgreen@firstenvironment.com

RE: Off-site Investigation – 11 New King Street
Westchester County Airport, Site No. C360174
240 Airport Road
Harrison, NY 10604, Westchester County

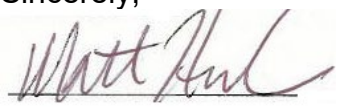
Dear Commissioner Greechan and Mr. Green,

Soil and sediment sampled from the northern parcel of the Westchester County Airport (Tax Parcel Number 119.03-1-6) near surface water discharges from Outfall 07 (OF-07) on July 7, 2021 and resampled on August 17, 2021 documented perfluorooctanesulfonic acid (PFOS) concentrations of 22.4 parts per billion (ppb), 26.5 ppb, 26.6 ppb, 70.4 ppb, up to 133 ppb (diluted). Based upon these results, the Department, in our letter dated May 20, 2021, requested additional investigation of this area. The results of this further investigation, which focused on delineation sampling proximate to sample identification number New King Street 4, were provided in in the July and September monthly reports, dated August 9, 2021 and October 8, 2021, respectively, from First Environment. Based upon the results of this recent investigation, the Department is hereby requesting delineation of the extent of the documented contamination in soil, sediment, and groundwater in this area, including off-site parcel(s) as is required as part of a remedial investigation under the Brownfield Cleanup Program. This investigation work should take priority now, in coordination with the development of a site-wide remedial investigation work plan.

Please indicate within 15 days of this letter if the County will submit a work plan for this off-site investigation and submit a workplan within 30 days of the date of this letter.

Such workplan must allow adequate time for Department review prior to commencement of the work. If you or your consultant have any questions or require clarification on these responses, please do not hesitate to contact me at (518) 402-9605 or by email at matthew.hubicki@dec.ny.gov

Sincerely,



Matthew Hubicki
Project Manager
Division of Environmental Remediation

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M. Hubicki (matthew.hubicki@dec.ny.gov) /File

ATTACHMENT 2

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau C
625 Broadway, 12th Floor, Albany, NY 12233-7014
P: (518) 402-9662 I F: (518) 402-9679
www.dec.ny.gov

Transmitted via E-mail

May 20, 2021

Commissioner Hugh Greechan, Jr., P.E.
County of Westchester
Westchester County Department of Public Works and Transportation
148 Martine Avenue, 5th Floor
White Plains, New York 10601
Hjg7@westchestergov.com

RE: Supplemental Investigation – Northern Parcel /11 New King Street
Westchester County Airport, Site No. 360174
240 Airport Road
Harrison, NY 10604, Westchester County

Dear Commissioner Greechan,

Through comments received during the public comment period on the Brownfield Cleanup Program Application, the Department became aware of potential impacts from the Airport to an offsite property. The Department received multiple comment letters from New King Street, LLC and, Mr. Mark Chertok, the attorney representing them, regarding the property at 11 New King Street, along with some sampling data on groundwater and the potable well.

Outfall 07 (OF-07) at the airport discharges to the ground surface and/or surface water at the north end of the airport. Based upon available information, this discharge flows off the airport property and appears to flow across the property at 11 New King St. A currently unused potable well was found to be contaminated with per- and polyfluorinated alky substances (PFAS) which are the contaminants of concern in the discharge of OF-07. PFOA was detected at 32.8 parts per trillion (ppt) and PFOS was detected at 83.5 ppt in this potable well.

The Department is requesting that the Airport perform groundwater, soil, and sediment sampling in this area to assess if PFAS contamination may be impacting the adjacent parcel. As you may be aware, full delineation of the nature and extent of contamination at and originating from the airport is required under the BCP. This will include off-site investigation to the extent necessary to delineate the contamination. The figure below indicates the area for which sampling is now requested.

Please indicate within 15 days of this letter if you'll have the consultant submit a work plan for this supplemental SC investigation with adequate time for Department review prior to commencement of the work. If you or your consultant have any questions or require clarification, please contact me at (518) 402-9605 or by email: matthew.hubicki@dec.ny.gov

Sincerely,

Matthew Hubicki
Project Manager
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