

September 2, 2020

Mr. Joshua Haugh
NYS Department of Environmental Conservation
Division of Environmental Remediation – Region 4
1130 North Westcott Road
Schenectady, NY 12306

Re: ALCO-Maxon Holdings, LLC – Parcel C - BCP Site C447044
Emerging Contaminants Work Plan

File: 1368.001.004

Dear Mr. Haugh:

On behalf of ALCO Maxon Holdings, LLC (MAH), Barton and Loguidice, Inc. (B&L) has prepared the following work plan to conduct emerging contaminant at BCP Sites C447042, C447043, and C447044. This work plan has been prepared in response to the Department's July 2, 2019 request to establish existing water quality background values at the facility for emerging contaminants. This letter has also been updated to respond to comments received on May 26, 2020.

It is our understanding that the Department's goal is to established background groundwater quality values for emerging contaminants (1,4-dioxane and per-and polyfluoroalkyl substances (PFAS)) which will be used to establish statistical trigger values for PFAS, 1,4-dioxane in the future at the sites.

Included in the listing below are the selected operational monitoring well locations proposed for emerging contaminant analysis. The objective is to select representative monitoring locations from the sites for the collection of groundwater quality samples. In response to comment 1 in the May 26, 2020 letter and a subsequent phone call with NYSDEC staff, we have added an additional well to improve spatial coverage. Only one well was identified to improve coverage as many historical wells have been abandoned on site. The following monitoring wells have been proposed:

Parcel A

- MW-65
- MW-64S
- MW-73 (historical collection well on riverbank)

Parcel B

- MW-67



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Parcel C

- MW-19
- MW-70S

Samples will be collected in accordance with the NYSDEC guidelines for Groundwater Sampling for Emerging Contaminants (July 2018) and Guidelines for Sampling and Analysis of PFAS (January 2020).

Monitoring well purging and sampling will be completed utilizing the existing certified PFAS-free bailers. The following QA/QC samples will be collected: one duplicate sample, one matrix spike/matrix spike duplicate, and a field blank. Field blanks will be collected with laboratory provided PFAS-free water.

Upon sampling completion, chain-of-custody records for the samples will be maintained. A sample will be considered to be "in custody" of an individual if said sample is either in direct view of or otherwise directly controlled by that individual. Storage of samples during custody will be accomplished according to established preservation techniques (for this sampling event ice will be used for sample preservation) in appropriately sealed and labeled containers.

The samples will be submitted to Pace Analytical for the following analyses:

- EPA method 537M for PFAS
- EPA method 8270 SIM for 1,4-Dioxane

The laboratory report will be a full category B deliverable package. B&L will review the analytical data and prepare a summary table to be used as background values and development of trigger values for the site monitoring network. Sample results will be submitted electronically to the Department as a PDF.

In accordance with the Department's Guidelines for Sampling and Analysis of PFAS (January 2020) and as requested by the Department in the May 26, 2020 correspondence, a Data Usability Summary Report will also be prepared by an independent, third party data validator. All data will be submitted by upload to EQUIS.

We will plan to complete this monitoring, pending the Department's approval, during the 2020 Fourth Quarter groundwater monitoring event.

If you have any questions regarding our proposed work plan, please contact me.

Sincerely,



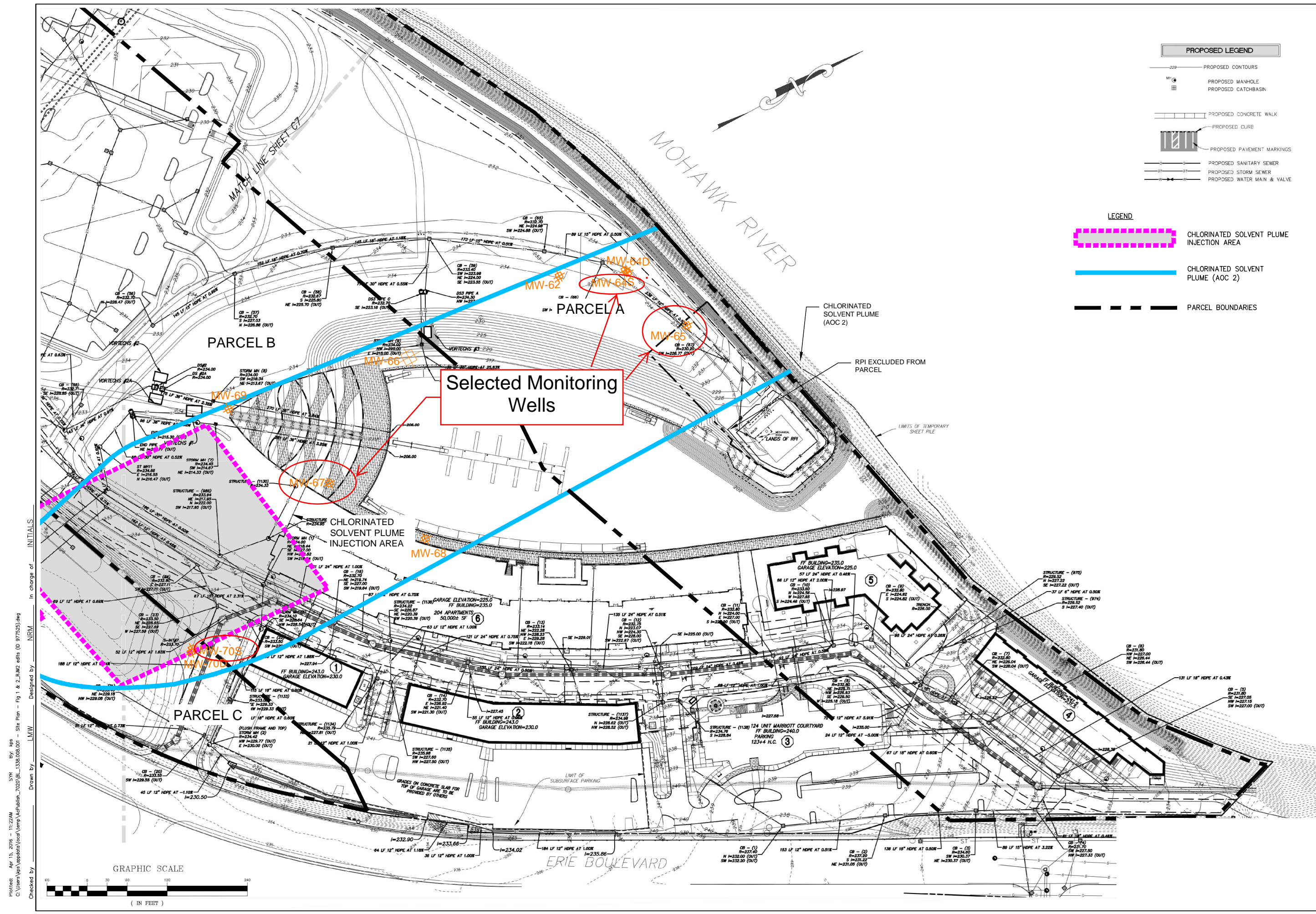
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BARTON & LOGUIDICE D.P.C.

A handwritten signature in black ink, appearing to read 'C. Steinmuller'.

Corinne I. Steinmuller
Environmental Scientist

CIS
Enclosure



PROPOSED LEGEND

- 229 — PROPOSED CONTOURS
- ⊙ PROPOSED MANHOLE
- ⊞ PROPOSED CATCHBASIN
- ▭ PROPOSED CONCRETE WALK
- ▬ PROPOSED CURB
- ▨ PROPOSED PAVEMENT MARKINGS
- PROPOSED SANITARY SEWER
- PROPOSED STORM SEWER
- +— PROPOSED WATER MAIN & VALVE

LEGEND

- ▭ CHLORINATED SOLVENT PLUME INJECTION AREA
- CHLORINATED SOLVENT PLUME (AOC 2)
- - - - - PARCEL BOUNDARIES

NO ALTERATION PERMITTED HEREON EXCEPT AS PROVIDED UNDER SECTION 7209 SUBDIVISION 2 OF THE NEW YORK STATE EDUCATION LAW.

COMPLETED CONSTRUCTION

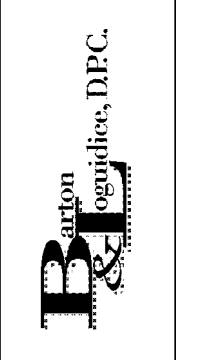
Significant Construction Changes Are Shown

By _____ Date _____

Ck'd _____ Date _____

REVISIONS

GALESI GROUP
MAXON ALCO HOLDINGS, LLC
Parcels A, B, and C Monitoring Well Networks
CITY OF SCHENECTADY
SCHENECTADY COUNTY, NEW YORK



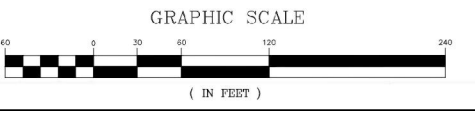
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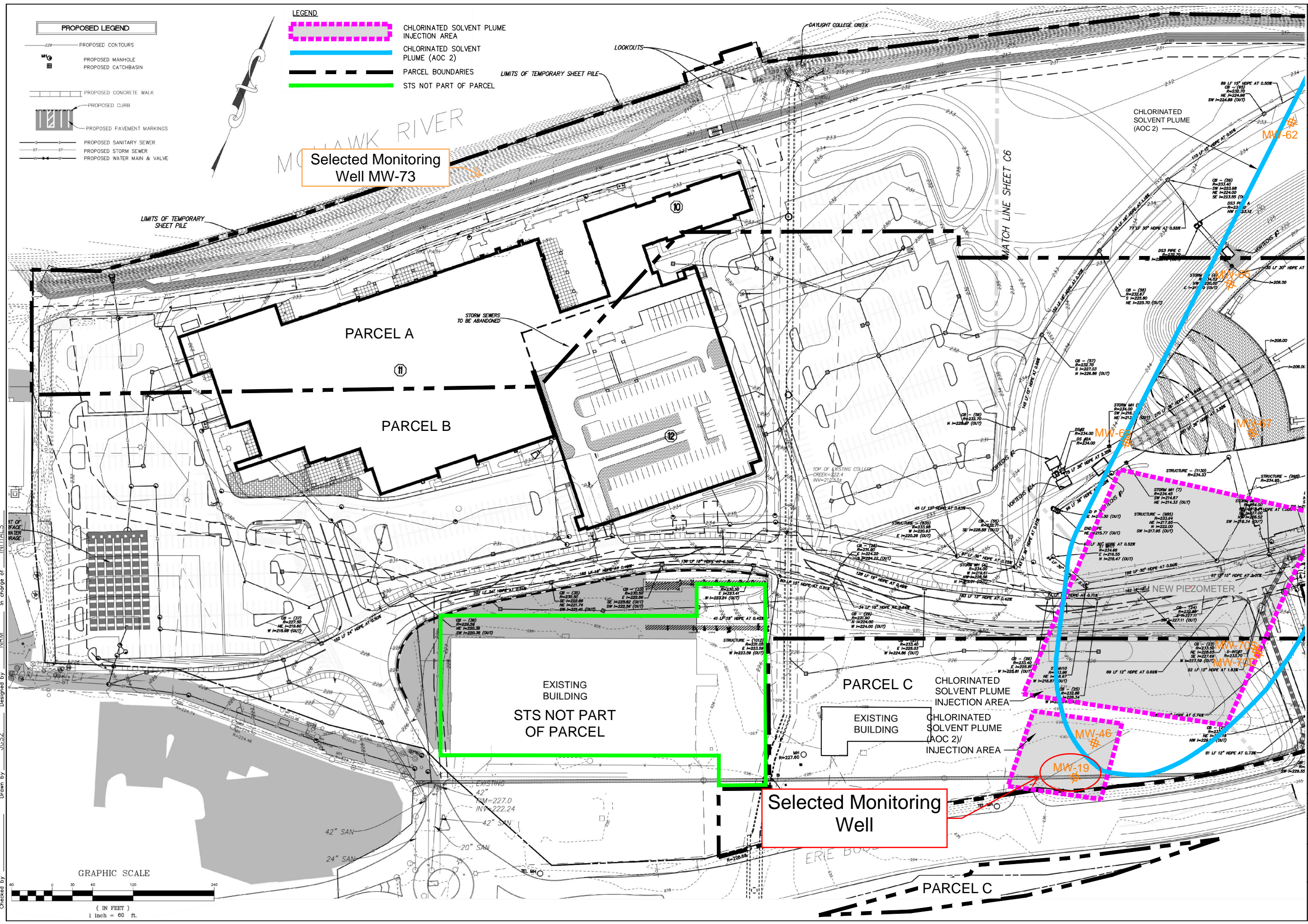
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File Number: 1338.008.001

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 Checked by: INRM
 In charge of: INITIALS





PROPOSED LEGEND

- PROPOSED CONTOURS
- ⊕ PROPOSED MANHOLE
- ⊕ PROPOSED CATCHBASIN
- ▬ PROPOSED CONCRETE WALK
- ▬ PROPOSED CURB
- ▬ PROPOSED PAVEMENT MARKINGS
- PROPOSED SANITARY SEWER
- PROPOSED STORM SEWER
- PROPOSED WATER MAIN & VALVE

LEGEND

- ▬ CHLORINATED SOLVENT PLUME INJECTION AREA
- ▬ CHLORINATED SOLVENT PLUME (AOC 2)
- ▬ PARCEL BOUNDARIES
- ▬ STS NOT PART OF PARCEL

Selected Monitoring Well MW-73

Selected Monitoring Well

NO ALTERATION PERMITTED HEREON EXCEPT AS PROVIDED UNDER SECTION 7209 SUBDIVISION 2 OF THE NEW YORK STATE EDUCATION LAW.

COMPLETED CONSTRUCTION

Significant Construction Changes Are Shown

By _____ Date _____
 Ck'd _____ Date _____

REVISIONS

NO.	DATE	DESCRIPTION

GALESI GROUP
 MAYON ALCO HOLDINGS, LLC
Parcels A, B, and C Monitoring Well Networks
 SCHOENECTADY COUNTY, NEW YORK

Barlton
R
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Date
 JANUARY 2016

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File Number
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 Drawn by JGSZ
 Designed by NRM
 In charge of INITIALS

GRAPHIC SCALE

