



November 7, 2018

Reference No. 37-11082

Mr. Christopher F. Mannes III, P.E.  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 7  
615 Erie Boulevard West  
Syracuse, New York 13204-2400

**Re: Emerging Contaminants Sampling Letter Work Plan  
Celi Drive Brownfield Cleanup Program Site (Site #C734108)**

Dear Mr. Mannes:

GSP Holdings, Inc. has retained GHD Consulting Services Inc. (GHD) to assist in complying with the New York State Department of Environmental Conservation (NYSDEC) letter dated April 3, 2018, in regards to a request to sample for emerging contaminants at the Celi Drive Brownfield Cleanup Program (BCP) Site in the Town of Dewitt, Onondaga County, New York (the 'Site', No. C734108).

GSP Holdings, Inc. is proposing to sample four (4) groundwater monitoring wells (see attached figure), as follows:

- MW-7 – near downgradient boundary of the property
- MW-5 – near western boundary of Site
- MW-8 – near eastern boundary of Site
- MW-3 – near upgradient boundary of Site.

The wells were previously installed as part of the Site's involvement in the NYSDEC BCP. The four (4) monitoring wells are screened in the interval of approximately 3 to 16 feet below ground surface and represent the groundwater quality near the perimeter of the Site.

GHD personnel will record depth to water and total depth of well measurements. The wells will be purged of a minimum of three well volumes, or until the well goes dry, whichever occurs first, using dedicated high-density polyethylene (HDPE) bailers. The purge water will be collected and containerized in 55 gallon drums, which will be staged on-Site for future management. Following purging, GHD personnel will collect a groundwater sample from each of the proposed wells using the dedicated disposable HDPE bailers used for purging. Samples will be collected following guidelines and procedures to minimize the potential contamination of the samples. The samples will be placed directly into containers provided by the laboratory, packed in ice-filled coolers, and submitted to Alpha Analytical of Westborough, Massachusetts (an ELAP-certified laboratory) for analysis.

Laboratory analysis will include the per- and polyfluoroalkyl substances (PFAS) target analyte list, developed by the Department of Environmental Remediation (DER), using modified Environmental Protection Agency (EPA) Method 537 and 1,4-dioxane using EPA Method 8270.



The PFAS target analyte list will include:

- Perfluorobutanesulfonic acid (PFBS)
- Perfluorohexanesulfonic acid (PFHxS)
- Perfluoroheptanesulfonic acid (PFHpS)
- Perfluorooctanesulfonic acid (PFOS)
- Perfluorodecanesulfonic acid (PFDS)
- Perfluorobutanoic acid (PFBA)
- Perfluoropentanoic acid (PFPeA)
- Perfluorohexanoic acid (PFHxA)
- Perfluoroheptanoic acid (PFHpA)
- Perfluorooctanoic acid (PFOA)
- Perfluorononanoic acid (PFNA)
- Perfluorodecanoic acid (PFDA)
- Perfluoroundecanoic acid (PFUA/PFUdA)
- Perfluorododecanoic acid (PFDoA)
- Perfluorotridecanoic acid (PFTriA/PFTTrDA)
- Perfluorotetradecanoic acid (PFTA/PFTeDA)
- 6:2 Fluorotelomer sulfonate (6:2 FTS)
- 8:2 Fluorotelomer sulfonate (8:2 FTS)
- Perfluorooctanesulfonamide (FOSA)
- N-methyl perfluorooctanesulfonamidoacetic acid (N-MeFOSAA)
- N-ethyl perfluorooctanesulfonamidoacetic acid (N-EtFOSAA)

In accordance with guidance received from NYSDEC, each of the PFAS analytes will be reported to a reporting limit of 2 nanograms per liter (ng/L, parts per trillion [ppt]) and 1,4-dioxane analysis will have a method detection limit no higher than 0.28 micrograms per liter (ug/L, parts per billion [ppb]). Laboratory qualified data will be included for all analytes.

In addition to the four (4) groundwater samples, GHD will also take four (4) quality assurance/quality control (QA/QC) samples, including one (1) blind field duplicate sample, one (1) matrix spike sample, one (1) matrix spike duplicate sample, and one (1) field blank sample.

The 55 gallon drum of purge water will be staged on-Site and managed by GSP Holdings, Inc. in a similar manner as previously generated drums of purge water collected from previous groundwater monitoring events.

A data usability summary report (DUSR) will be prepared based on laboratory analytical results of all groundwater samples and associated QA/QC samples. A summary report of the sampling methods, analytical results, and DUSR findings will be prepared and submitted to the NYSDEC.

The above referenced sampling will be implemented on a schedule agreed to by GSP Holdings, Inc. NYSDEC will be given five (5) business days' notice prior to the scheduled sampling date.



If you have any questions or require additional information, please feel free to contact me at 315-679-5838 or Mr. Thomas Gerhardt at GSP Holdings, Inc.

Sincerely,

GHD

A handwritten signature in black ink, appearing to read "Damian J. Vanetti", is written over a faint, light blue circular background.

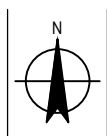
Damian J. Vanetti, P.E.  
Principal Engineer – Environment

DJV

Enclosures

Figure 1 – Proposed Groundwater Monitoring Wells to be Sampled

cc: Mr. Thomas Gerhardt, GSP Holdings, Inc. (w/encs.)  
Ms. Doreen Simmons, Hancock Estabrook, LLP (w/encs.)  
Mr. Richard Jones, NYSDOH (w/encs.)  
Mr. Harry Warner, NYSDEC (w/encs.)



GSP Holdings, Inc.  
Celi Drive BCP Site (#C734108)  
Emerging Contaminants Sampling  
Proposed Groundwater Monitoring  
Wells to be Sampled

Job Number | 37-11082  
Revision | A  
Date | 11.07.2018

**Figure 1**