January 28, 2022 *sent via email*

Ms. Karen Cahill
Project Manager
NYSDEC Division of Environmental Remediation
Region 7
615 Erie Boulevard
West Syracuse, New York 13204-2450

Re: Revised Pre-Remedial Design Sampling Submission for Brownfield Cleanup Program
Site No.C734134 (Site 6)
JMT No.19-02692

On behalf of Destiny USA Land Company, LLC, JMT of New York, Inc. is pleased to provide this revised submission for a Pre-Remedial Design Investigation for BCP Site No. C734134 (Site 6), based on comments provided by the NYSDEC.

A Remedial Work Plan (RWP) for Site 6 was submitted to NYSDEC on October 31, 2019. NYSDEC issued a comment letter dated December 9, 2019, not approving the RWP, and requesting an Area of Concern (AOC) to be further addressed. Subsequently, a meeting with NYSDEC, NYSDOH, Destiny, and JMT was held on January 24, 2020, to discuss the Agencies' comments regarding the work plan and a path forward. It was agreed that additional investigation in the form of a Pre-Remedial Design Investigation should be conducted to evaluate the AOC. A Pre-Remedial Design Sampling Submission was sent to the NYSDEC on November 15, 2021, and the NYSDEC responded with comments on December 30, 2021. This document has been revised to address the NYSDEC comments.

The AOC was identified in the Remedial Investigation Report (RIR) dated June 2016 (final revision) and accepted by NYSDEC on June 17, 2016. That AOC primarily focused on petroleum contamination. In addition to investigating petroleum contamination in the AOC, NYSDEC has requested further investigation of a few isolated areas with elevated lead, arsenic, and/or polyaromatic hydrocarbons (PAHs). The proposed investigation will better define the AOC previously identified on Site 6 and will provide additional geochemical data for evaluation of potential remediation technologies.

Soil Sampling:
An additional 15 soil borings (22-B-1 through 22-B-15) will be completed within and adjacent to the AOC. Locations of the proposed soil borings are illustrated on Figure 1. Proposed depth zones of soil sample collection and constituents to be analyzed in each of the boring locations are summarized on Table 1. Where possible, the proposed sampling intervals correspond to the most impacted depths observed in adjacent borings that were previously sampled during the Remedial Investigation (RI). However, final soil sample depths will be selected at each proposed boring location based upon field observations of depth to water, PID measurements, and visual impacts. Further, no soil sample will be collected from an interval exceeding 2 feet. A maximum of one constituent group (e.g. VOCs, SVOCs, etc…) will be collected from each soil boring.

Monitoring Well Development:

Prior to groundwater sampling activities, five wells (SP-MW-1SR, SP-MW-4R, SP-MW-9SR, SP-MW-28, and SP-MW-30) will be redeveloped. During development, the well will be surged by physical agitation with a bailer, pump, or surge block. Groundwater will be pumped until it is visually free of suspended sediment, with a goal of achieving turbidity of 50 NTU or less. A minimum of five casing volumes will be removed during development, unless the well becomes dewatered. Development will cease after 60 minutes if asymptomatic conditions are achieved. The wells will rest for at least 1 week between redevelopment and sampling to ensure representative samples.

Groundwater Gauging and Sampling:
JMT will conduct a round of depth-to-water measurements and gauge existing monitoring wells for potential non-aqueous phase liquids (NAPL). Groundwater samples will be collected from five wells (SP-MW-1SR, SP-MW-4R, SP-MW-9SR, SP-MW-28, and SP-MW-30) and sent for laboratory analysis. The constituents to be analyzed in the groundwater samples are summarized in Table 1. In addition to analysis of the contaminants of concern (COCs), the groundwater from two wells will be analyzed for total organic carbon (TOC), sulfate, and nitrate. These analyses will be used to evaluate future remediation alternatives. Finally, a groundwater sample will be collected from upgradient well SP-MW-9SR and analyzed for PFAS and PFOA per Method 537 (modified).

Quality Control Samples:
As per the Section 3.2 of the JMT Quality Assurance Project Plan (QAPP), one field duplicate sample, one Matrix Spike, and one Matrix Spike Duplicate will be collected for each constituent analyzed in soil and for each constituent analyzed in groundwater. Further, trip blanks will be used at a rate of one per cooler for samples to be analyzed for volatile organics. One equipment blank and one field blank will also be collected from monitoring well SP-MW-9SR per NYSDEC's June 2021 Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Guidance. All analytical results will be validated and submitted to EQUIS. Preliminary results will be provided to the NYSDEC and NYSDOH in order to expedite the review process.

Based on this additional work and findings, JMT will review and evaluate the new analytical data relative to potential remediation strategies and revise the previously submitted Remedial Work Plan (RWP, October 31, 2019). At present, the final use of the site may be restricted residential, commercial, or a combination of both. JMT will compare the analytical results to the appropriate Soil Cleanup Objectives in the revised RWP, when a final end use has been determined. Any "grossly contaminated soils" (i.e. the presence of sheen or product, odors, and/or PID readings over 1,000 ppm) observed onsite will be detailed in the report.

Schedule:
Upon final approval of this plan from NYSDEC, JMT proposes to begin soil sampling and monitoring well redevelopment within 60 to 90 days - pending weather, subcontractor availability, and coordination of JMT staff with other Destiny related BCP sites. It is anticipated that field work proposed in this plan will be completed within 30 days of commencement. Assuming that no further field work is necessary, JMT plans to submit a revised RWP to the NYSDEC within 90 days of receipt of laboratory data. However,

this schedule may need to be extended since site development projects have been impacted by economic factors associated with COVID.

If you have any questions, do not hesitate to contact me at (518) 218-5930 or RLaFleur@jmt.com.

Sincerely,

JMT of New York, Inc.

Robert C. LaFleur, P.G.
Vice President

cc: D. Aitken, Destiny
G. Priscott, DEC
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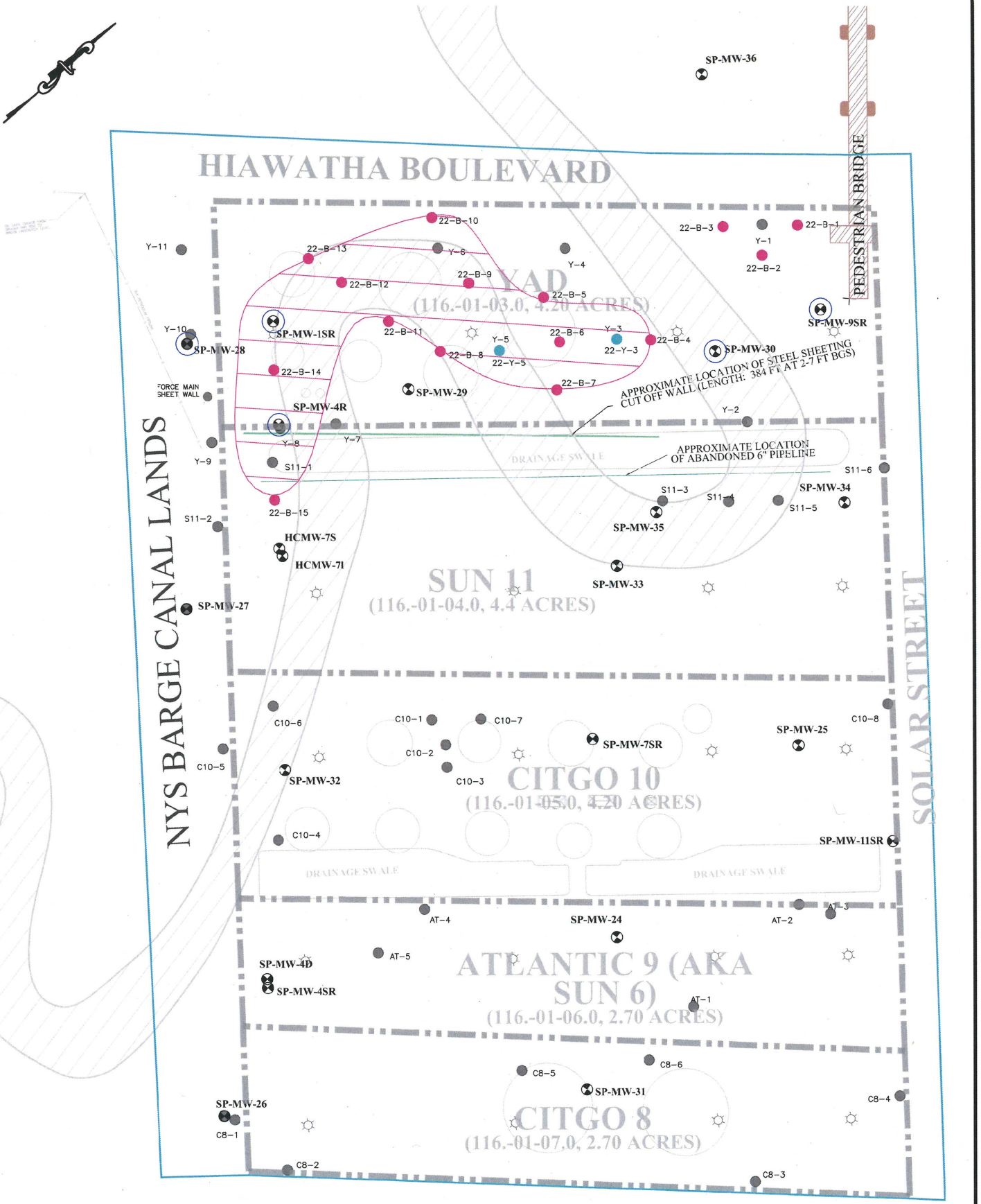

○ PROPOSED GROUNDWATER SAMPLE LOCATION
● PROPOSED SOIL RE-SAMPLE LOCATION
● PROPOSED SOIL BORING LOCATION

NOTES:
1. HISTORIC BORING LOCATIONS Y-3 AND Y-5 TO BE RESAMPLED FOR TCLP METALS
2. MONITORING WELLS SP-MW-1SR, -4R, -28, AND -30 TO BE RESAMPLED for VOCs/SVOCs
3. MONITORING WELL SP-MW-9SR TO BE SAMPLED FOR PFAs

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PROPOSED SAMPLE LOCATION MAP
SITE 6
DESTINY USA
CITY OF SYRACUSE ONONDAGA CO., NY

PROJ. No.: 19-02692	DATE: 1/14/22	SCALE: 1"=70'	DWG. NO. 19-02692	FIGURE 1

Table 1: Proposed Sampling Summary

Media	Sample ID	Analyses	Proposed Sample Depth Range
Soil	22-B-1	SVOCs	6-8 ft.
	22-B-2		6-8 ft.
	22-B-3		6-8 ft.
	22-B-4	VOCs, SVOCs, Metals	4-12 ft.
	22-B-5		4-20 ft.
	22-B-6		4-12 ft.
	22-B-7		4-12 ft.
	22-B-8		6-10 ft.
	22-B-9	VOCs, SVOCs, Metals, Total Organic Carbon*	6-10 ft.
	22-B-10	VOCs, SVOCs	6-10 ft.
	22-B-11		6-10 ft.
	22-B-12	VOCs, SVOCs, Total Organic Carbon*	6-10 ft.
	22-B-13	VOCs, SVOCs	6-10 ft.
	22-B-14	VOCs, SVOCs, Total Organic Carbon*	4-12 ft.
	22-B-15	VOCs, SVOCs	8-12 ft.
	22-Y-3	TCLP Lead, TCLP Arsenic, Total Organic Carbon	4-6 ft.
	22-Y-5	TCLP Lead, Total Organic Carbon, Soil Oxygen Demand	9-10 ft.
Groundwater	SP-MW-1SR	VOCs, SVOCs, Total and Dissolved Metals, Sulfate, Nitrate, Total Organic Carbon	
	SP-MW-4R	VOCs, SVOCs, Total and Dissolved Metals, Sulfate, Nitrate, Total Organic Carbon	
	SP-MW-28	VOCs, SVOCs	
	SP-MW-30	VOCs, SVOCs	
	SP-MW-9SR	PFAS (includes PFOA and PFOS)	

Notes:

1. Borings 20-Y-3 and 20-Y-5 will be located as close as possible to the original Y-3 and Y-5, respectively.
2. * Total organic carbon samples will be collected from **two** of these three boring locations based on field observations.
3. All soil sample intervals subject to change based on field observations (PID, depth to water, visual observations).
4. The quality control sample rate of 1 per 20 does not apply to TOC, sulfate, nitrate, and soil oxygen demand.