

October 24, 2018

Charlotte B. Theobald New York State Department of Environmental Conservation 6274 East Avon-Lima Road Avon, New York 14414

Re: Emerging Contaminants Sampling Work Plan Eldre Corporation 1500 Jefferson Road & 55 Hofstra Road Henrietta, New York NYSDEC BCP Site C828182 LaBella Project No. 212721.01

Dear Ms. Theobald,

LaBella Associates, D.P.C. ("LaBella") is submitting this Work Plan in response to your April 12, 2018 letter request for sampling of emerging contaminants at the New York State Department of Environmental Conservation ("NYSDEC") Brownfield Cleanup Program ("BCP") Site #C828182 located at 1500 Jefferson Road and 55 Hofstra Road in the Town of Henrietta, New York, herein after referred to as "the Site." This Work Plan provides methods for sampling groundwater at the Site for emerging contaminants, per- and polyfluoroalkyl substances ("PFAS") and 1,4-dioxane. Sampling will be conducted in accordance with NYSDEC's "*Groundwater Sampling for Emerging Contaminants*" guidance dated April 2018 ("NYSDEC Guidance").

The following wells will be sampled for PFAS and 1,4-dioxane:

- SB-215/MW-19 (upgradient of source)
- SB-208/MW-15 (source area)
- SB-212/MW-16 (downgradient of source)

If any of the abovementioned wells are inaccessible for sampling or are dry, attempts to sample the monitoring well in closest proximity to the proposed well will be made and the NYSDEC will be notified. Refer to the attached Figure 1 for well locations.

PFAS SAMPLING PROCEDURES

Samples for PFAS analysis will be collected first, using dedicated disposable high density polyethylene (HDPE) and/or PVC bailers. Samples will be collected in bottleware provided by the laboratory. Because PFAS are found in numerous everyday items, the following special precautions will be taken during sampling activities:

- No use of Teflon®-containing materials (e.g., Teflon® tubing, bailers, tape, sample jar lid liners, plumbing paste).
- No use of low density polyethylene (LDPE)-containing materials.
- No Tyvek® clothing will be worn by samplers.

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- Clothes treated with stain-resistant or rain-resistant coatings (e.g., Gortex®) will be not be worn by samplers.
- All clothing worn by sampling personnel must have been laundered multiple times.
- No fast food wrappers, disposable cups or microwave popcorn will be within the vicinity of the wells/ samples.
- There will be no use of chemical (blue) ice packs, aluminum foil, or Sharpies® within the vicinity of the wells/ samples.
- No use of sunscreen, insect repellants, cosmetic, lotions or moisturizers will be allowed by sampling personnel the day of sampling.
- If any of the above items are handled by the field personnel prior to sampling activities, field personnel will wash their hands thoroughly with soap and water prior to any sampling activities.
- Powder-free nitrile gloves will be worn during all sample collection activities.

Quality assurance/ quality control (QA/QC) samples for PFAS sampling will include one (1) field duplicate, one (1) matrix spike / matrix spike duplicates (MS/MSD) and one (1) equipment blank. The procedures and rationale for collecting these samples are described below.

- Field duplicate Sample will be used to assess the variability in concentrations of samples from the same well due to the combined effects of sample processing in the field and laboratory as well as chemical analysis.
- Matrix spike/matrix spike duplicate Sample will be used to provide information about the effect of the sample matrix on the design and measurement methodology used by the laboratory.
- Equipment blank Sample will be collected to help identify possible contamination from sampling equipment (i.e., bailer). One equipment blank will be collected by pouring laboratory certified analyte-free deionized water over a bailer into the sample container.

PFAS samples will be submitted to an Environmental Laboratory Accreditation Program (ELAP) certified laboratory for analysis of the full PFAS target analyte list (21 compounds listed in the NYSDEC Guidance) via modified USEPA Method 537 with a method detection limit not to exceed 2 ng/L. Note, the laboratory utilized will be ELAP certified for PFOA and PFOS in drinking water by EPA method 537 or ISO 25101 as ELAP does not currently offer certification for PFAS compounds in matrices other than finished drinking water.

1,4-DIOXANE SAMPLING PROCEDURES

Samples for 1,4-dioxane analysis will be collected via low-flow techniques (ie., bladder pump) following PFAS sample collection. Wells will be purged and water quality parameters including turbidity, pH, temperature, specific conductivity, dissolved oxygen, oxidation reduction potential, and depth to water will be recorded at five (5) minute intervals. Samples will be collected after the parameters have stabilized for three (3) consecutive 5-minute intervals to within the specified ranges below:

- Water level drawdown (<0.3')
- o Turbidity (+/- 10%)
- o pH (+/-0.1)

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- Temperature (+/- 3%)
- Specific conductivity (+/- 3%)
- Dissolved Oxygen (+/- 10%)
- Oxidation reduction potential (+/- 10 millivolts)

QA/QC samples for 1,4-dioxane sampling will include one (1) field duplicate and one (1) MS/MSD (refer to previous section for description). Samples will be submitted to an ELAP certified laboratory for analysis of 1,4-dioxane via USEPA method 8270 in selective ion monitoring (SIM) mode with a method detection limit not to exceed 0.28 ug/L. Purge water will be containerized in a 55-gallon drum on-Site pending off-Site disposal.

SAMPLE PACKING AND SHIPMENT

Sample bottles, coolers, and packing materials will be supplied by the analytical laboratory. Individual sample jars will be labeled and sealed. Samples will then be packed in a cooler with ice to maintain a temperature of approximately 4°C (±2°C). A chain of custody (COC) will be sent with each shipment. Each cooler will also be sealed with a COC seal. Coolers containing samples for chemical analyses will be transported to the laboratory by courier or overnight shipping service.

HEALTH AND SAFETY

LaBella's Health and Safety Plan included in the Remedial Investigation Work Plan for this Site will be utilized for the work described herein.

DELIVERABLES

The laboratory will provide an Analytical Services Protocol (ASP) Category B data package. A Data Usability Summary Report (DUSR) will be completed by a third party. Electronic data deliverables (EDDs) will be generated by the laboratory in EQUIS[™] format and submitted to NYSDEC.

A summary report will be developed following receipt of all validated data detailing the results of the sampling.

SCHEDULE

Samples will be collected within 30 days of written NYSDEC approval of this Work Plan. The summary report will be submitted to NYSDEC within 60 days of receipt of all validated data.

CERTIFICATION

I Daniel Noll certify that I am currently a NYS registered professional engineer and that this Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10). NYSDEC – Ms. Charlotte Theobald October 24, 2018 Page 4

If you have any questions please do not hesitate to contact me at (585) 295-6611.

Respectfully submitted,

LABELLA ASSOCIATES, D.P.C.

P. 111

Daniel P. Noll, PE Project Manager



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FIGURE







ELDRE CORPORATION BCP SITE C828182

1500 JEFFERSON ROAD AND 55 HOFSTRA ROAD

Monitoring Well Locations



0	40	80
1	1	
	Feet	

1 inch = 80 feet Intended to print as 11" x 17".

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FIGURE 1