**APRIL 2010**
**PROPOSED INTERIM GROUNDWATER**
**MONITORING PLAN (IGWMP) MODIFICATION**

This modification to the Interim Groundwater Monitoring Plan (IGWMP) presented in the 2007 RCRA Facility Investigation (RFI) Report is based on the groundwater sampling data obtained since the IGWMP was initiated in Fourth Quarter 2006 up to and including supplemental sampling conducted in February 2010. The proposed IGWMP modifications will continue to provide adequate monitoring to detect any changes in subsurface site conditions which could potentially result in: 1) increased migration of compounds of concern (COCs) in soils or groundwater; 2) completion of potential exposure pathways for human and environmental receptors; and/or 3) other threats to human health and/or the environment.

## Ground-Water Sampling

The proposed interim ground-water sampling schedule for the former Norton/Nashua Site is:

Semi-Annual (7-9 sampling locations):

- off-site wells: MP-6, MP-14, MP-17, MP-22, MW-18 & MW-19
- "plume" wells: 1-3 selected wells
- liquid-level gauging: all off-site and on-site wells

Annual (10-12 sampling locations):

- off-site wells: MP-6, MP-14, MP-17, MP-22, MW-18 & MW-19
- on-site "sentinel" wells: MW-12 (or DGC-10), MW-13 & MW-15
- "plume" wells: 1-3 selected wells
- liquid-level gauging: all off-site and on-site wells

## Ground-Water Sampling Contingencies

If COCs (i.e., toluene) are detected at concentrations above 1,000 µg/L in off-site monitoring points MP-6, MP-14, or MP-17, the corresponding downgradient off-site point (MP-5, MP-15/MP-16, or MP-18, respectively), will be sampled during the next scheduled sampling event. (Note: toluene has not been detected at MP-5 since 2004 and has never been detected at MP-15, MP-16, or MP-18.)

During 2009 and 2010 sampling events, toluene concentrations were well below historical maximums at each off-site monitoring location and at each on-site "sentinel" sampling location. If toluene concentrations increase to levels above or approaching historical maximums at any of these monitoring locations: 1) the NYSDEC Engineer will be notified within 72 hours; and 2) the need for confirmatory sampling, increased monitoring, and/or implementation of interim corrective measures (ICMs) will be discussed with the NYSDEC Engineer.

**Product Recovery and Product Recovery Contingency**

Liquid-level data will be collected at the site using an interface probe capable of detecting free-phase product (FPP). If FPP is detected at an apparent product thickness (APT) of 0.05 foot or more in any well(s), the NYSDEC will be notified within 48 hours, the FPP will be bailed, and all well(s) in the general vicinity will be gauged on at least a monthly basis until the APT decreases to less than 0.05 feet for two consecutive months. If the APT remains above 0.05 feet, petrophilic socks will be deployed at the monitoring well location(s).

If APTs of 0.05 foot or more continue to occur after monthly bailing and the deployment of petrophilic socks (or if sock deployment is not possible due to monitoring point construction), the contingency for an enhanced fluid recovery (EFR) event will be invoked. A full-well, high-vacuum EFR event via vacuum truck extraction will be performed at all product-bearing wells for a minimum time period of 30-60 minutes per well.

Monthly liquid-level data will be collected from former product-bearing wells after the EFR event. Groundwater quality may also be monitored to determine the effect of the vacuum event on dissolved COC concentrations. Following the EFR event, the field data and sampling results will be evaluated with the NYSDEC to determine if continued EFR events are warranted as part of the IGWMP.

If the above modifications to the IGWMP are acceptable, the next groundwater sampling event (annual event) will be scheduled for June-July 2010.