HANSON
VAN VLEET, PLLC

HYDROGEOLOGIC CONSULTANTS

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INTERIM REMEDIAL MEASURE WORK PLAN

WF LAKE COMPANY
65 Park Road
Town of Kingsbury
Washington County, New York
Site No.: 5-58-042

Submitted To:

Mr. Anthony Bollasina
Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, New York 12233

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1.0 INTRODUCTION

1.1 General

At the request of the WF Lake Company (WF Lake), Hanson Van Vleet, PLLC (HVV) has prepared this Work Plan (WP) for conducting a proposed Interim Remedial Measure (IRM) at the WF Lake property located at 65 Park Road in the Town of Kingsbury, Washington County, New York (Site; See Figure 1). This IRM Work Plan (IRMWP) was prepared based on information gathered during a previous site characterization completed at the Site by Camp Dresser McKee & Smith (CDM Smith), under New York State Department of Environmental Conservation (NYSDEC) contract. The findings provided by CDM Smith are summarized in the "Final Site Characterization Report" (FSCR), dated July 2020. This IRMWP was prepared in general conformance with the NYSDEC DER-10 (Technical Guidance for Investigation and Remediation).

An IRM is a cleanup activity performed to address site conditions, which can be undertaken without extensive investigation and evaluation, to prevent, mitigate or remedy environmental damage or the consequences of environmental damage attributable to a site. This IRMWP presents the activities and work to be completed by HVV and the WF Lake-selected Contractor in support of completing this Interim Remedial Measure (IRM). WF Lake will select a Contractor to complete the remedial activities in accordance with the requirements described in this IRMWP. HVV, as a representative of the WF Lake, will provide oversight, act as the regulatory liaison, and prepare a report.

This IRMWP is being prepared to address elevated concentrations of per- and polyfluoroalkyl substances (PFAS) compounds in stormwater catch basins at the Site identified by CDM Smith during previous site characterization activities.

1.2 Background

On August 7, 2017 A NYSDEC Spill Number 1704574 was assigned to the W F Lake Corp MFG0165, with the spill site address identified as 65 Park Road, Kingsbury, New York. The material listed as being spilled is PFOS with an unknown amount spilled and an unknown resource affected. The facility type is listed as "commercial/industrial", the spill cause is "other" and date spill closed is listed as "not closed". The Spill Number assigned to the Site indicates the alleged release of PFAS, identified after detections of Perfluorooctanic Acid (PFOA) were found to exceed United States (US) Environmental Protection Agency (EPA) Health Advisory Level concentrations at a residential drinking water well located less than 0.5 miles from the Site.

Previous site characterization activities were completed by CDM Smith and summarized in the FSCR, dated July 2020. Field activities completed by CDM Smith were conducted between December 31, 2019 and January 23, 2020. CDM Smith collected surface soil, subsurface soil, sediment, surface water, stormwater, debris, and groundwater samples on the Site to determine if volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), pesticides, polychlorinated biphenyls (PCBs), metals, 1,4-dioxane, or PFAS are present in any of the media sampled. The FSCR identified elevated PFAS concentrations in catch basins located on the Site.

The grated catch basin west of and adjacent to the building and loading dock identified as CB-01 by CDM Smith, located adjacent to the western wall of the manufacturing portion of the facility, was found to contain accumulated sediment exhibiting elevated levels of PFAS compounds. Concentrations of PFAS compounds were found to be far greater in sediment accumulated in catch basin CB-01 than elsewhere at the Site. Stormwater sampled and analyzed from catch basin CB-01 following a rain event on December 30, 2019 also identified elevated concentrations of PFAS compounds in excess of NYSDEC guidance levels. The sediment sample collected on January 23, 2020 from the base of catch basin CB-01 revealed a concentration of 14 parts per billion (ppb) when analyzed for PFOA Synthetic Precipitation Leaching Procedure (SPLP), and a total concentration of PFAS of 395.7 ppb. The stormwater sample collected from CB-01 on December 31, 2019 exhibited total PFAS concentrations of 3,426 parts per trillion (ppt).

Catch basin CB-01 is reported to discharge to a stormwater retention basin located adjacent to the northwest portion of the property that is shared and utilized by the stormwater systems of the adjacent and adjoining properties. Based on the results of the stormwater and stormwater sediment debris sampling conducted at CB-01, it is reasonable to assume that the accumulated PFAS impacted sediment in CB-01 may represent a source of PFAS contamination to stormwater that has the potential to migrate off-site in concentrations in excess of NYSDEC PFAS Guidance Levels.

1.3 Site Description

The Site is located at 65 Park Road in the Town of Kingsbury, County of Washington, New York. The Site is located west of and adjacent to Park Road. The Site consists of two parcels, identified by Washington County tax maps as tax map numbers 137.-2-32 and 137.-2-35, comprising approximately 4.14 acres of land. The Site covers a generally rectangular piece of land that is now located in a mixed commercial and industrial area.

The two existing structures are approximately 33,750 and 8,240 square feet. The Site is serviced by public water and sewer. No private supply wells, septic systems or floor drains exist or have existed at the Site. The Site is generally flat-lying and is largely occupied by structures and asphalt pavement. The eastern portions of the property are covered by wooded vegetation, small shrubs and grasses.

2.0 SCOPE OF WORK

The work described in this IRMWP will be conducted in conformance with the NYSDEC DER-10 (Technical Guidance for Investigation and Remediation) and *Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS)*, dated January 2021, and provided in Attachment A. Care will be taken to eliminate any off-site transfer of PFAS-containing material [e.g. aluminum foil, glass, polytetrafluorethylene (PTFE) Teflon®, low density polyethylene (LDPE), waterproof field books, synthetic water-resistant gear, plastic clipboards, Post-It Notes®, Chemical (blue) ice packs, Gore-Tex™, Tyvek®, etc.] during all on-site activities. Clothing worn by sampling personnel will be laundered multiple times without fabric softener. Permanent

markers will be avoided while sampling. Ball point pens will be utilized on Site. Packaged foods and drinks will be avoided during sampling.

2.1 Field Methods

HVV proposes vacuum removal and proper off-site disposal of the currently accumulated sediment and associated stormwater present in the catch basin identified as CB-01.

Waste characterization samples will be collected and analyzed prior to vacuum removal of the water and sediment. Waste characterization sediment samples will be collected with a stainless-steel scooping tool of sufficient length to not require any entry into the catch basin, and water samples will be collected with dedicated HDPE bailers.

As required by the disposal facility, the water and sediment samples will be analyzed for the 21 parameter PFAS list per Modified EPA Method 537 due to the ability to achieve 2 micrograms per liter (ng/L) or ppt detection limits.

Accumulated sediment and water samples to be collected for laboratory analysis for waste characterization will be placed in pre-cleaned laboratory provided 250 mL polypropylene sampling containers with wide screw caps and delivered to a NYS Environmental Laboratory Approval Program (ELAP) certified laboratory under formal chain-of-custody procedures. Samples collected from each of the catch basins. The samples will be analyzed for the 21 parameter PFAS list per Modified EPA Method 537 due to the ability to achieve 2 micrograms per liter (ng/L) or ppt detection limits.

Crystal Clean, a licensed hazardous waste hauler, will be contracted to vacuum the sediment and water to a tank truck, and transport the sediment and stormwater under signed waste manifest to an approved facility for proper disposal. All sediment and stormwater generated as part of the IRM will be self-contained within the catch basin and the vacuum truck equipment. HVV will provide supervision and documentation of the work completed.

At this time, no confirmatory sampling is planned after the implementation of the proposed IRM. It is assumed that future sampling of CB-01 and the downgradient stormwater retention basin (RP-01) will determine the effectiveness of the IRM.

2.2 Health and Safety Plan

All work at the Site will be performed in accordance with 29 CFR 1910.120 (OSHA Hazardous Waste Operations Training), the HVV Health and Safety Policy, and a site-specific Health and Safety Plan (HASP). The area surrounding catch basin CB-01 will be secured with cone delineators to prevent vehicle and pedestrian traffic from entering the area. All personnel entering the area will be required to have Level D personal protective equipment (PPE), including nitrile gloves, safety-toe boots, safety glasses, reflective safety vest, and a hard hat.

2.3 Decontamination

Any piece of equipment that can come in contact with the catch basin or the contents of the catch

basin will be cleaned with a standard two-step decontamination using an Alconox detergent mixture (or similar) and clean potable PFAS-free water rinse prior to the start of work and at completion of the work (before leaving the Site) to prevent any contamination from leaving the Site. All wash water will be recovered and vacuumed into the tank trunk for appropriate disposal.

2.4 Waste Management

All stormwater and stormwater sediment generated during the IRM will be collected and transferred by the vacuum truck operated by Crystal Clear, a contracted waste broker. The transportation of the waste material will be performed by Crystal Clear, a licensed transporter with NYSDEC 6 NYCRR 364 Waste Transporter Permits. The generator for the purposes of all shipping manifests shall be listed as "WF Lake Company".

A waste profile will be completed as part of the disposal process. As required by the disposal facility, the sample will be analyzed for the 21 parameter PFAS list per Modified EPA Method 537 due to the ability to achieve 2 micrograms per liter (ng/L) or ppt detection limits.

Accumulated sediment and water samples to be collected for laboratory analysis will be placed in pre-cleaned laboratory provided 250 mL polypropylene sampling containers with wide screw caps and delivered to a NYS Environmental Laboratory Approval Program (ELAP) certified laboratory under formal chain-of-custody procedures. Samples collected from each of the catch basins. The samples will be analyzed for the 21 parameter PFAS list per Modified EPA Method 537 due to the ability to achieve 2 micrograms per liter (ng/L) or ppt detection limits.

3.0 PROJECT SCHEDULE AND REPORTING

3.1 Project Schedule

HVV estimates that the field tasks outlined in this IRMWP will take approximately nine weeks to complete. The IRM will include vacuuming and proper offsite disposal of the stormwater and stormwater sediment within catch basin CB-01. The table below shows the approximate project schedule. The actual project starting date will depend on obtaining NYSDEC's approval of this IRMWP and availability of the vacuum truck contractor. The NYSDEC will be notified at least seven days prior to prior to the initiation of any field activities to be completed in support of the IRM.

Work Activity	Date	Duration
Submit IRM Work Plan	April 2021	--
IRM Work Plan Approval	May 2021	2 weeks
Characterization Sampling / Analysis	June 2021	2 Weeks
Schedule Vacuum Truck	June 2021	2 weeks
Implement IRM	June 2021	1 day
Submit Draft IRM Report	July 2021	2 days
NYSDEC Comments	July 2021	2 weeks
Submit Final IRM Report	July 2021	2 days

3.2 Report Preparation

Upon completion of the tasks described above, an IRM Report will be prepared that will be consistent with the general requirements set forth in the DER-10 Technical Guidance for Site Investigation and Remediation. The report will describe the methods used to perform the IRM including the following:

- Project summary;
- Discussion on the methods of IRM employed;
- Summary of waste characterization sampling, including physical state of the material (solid, liquid, sludge), the volume of material, number of samples collected, and laboratory analysis summary;
- A listing of all types and quantities of waste disposed of during implementation the IRM, as well as the name of the disposal facilities, transporters' dates of disposal, and the manifest numbers of each waste load;
- A general site location map consisting of a USGS topographic map with the Site identified;
- Conclusions section; and
- Recommendations section.

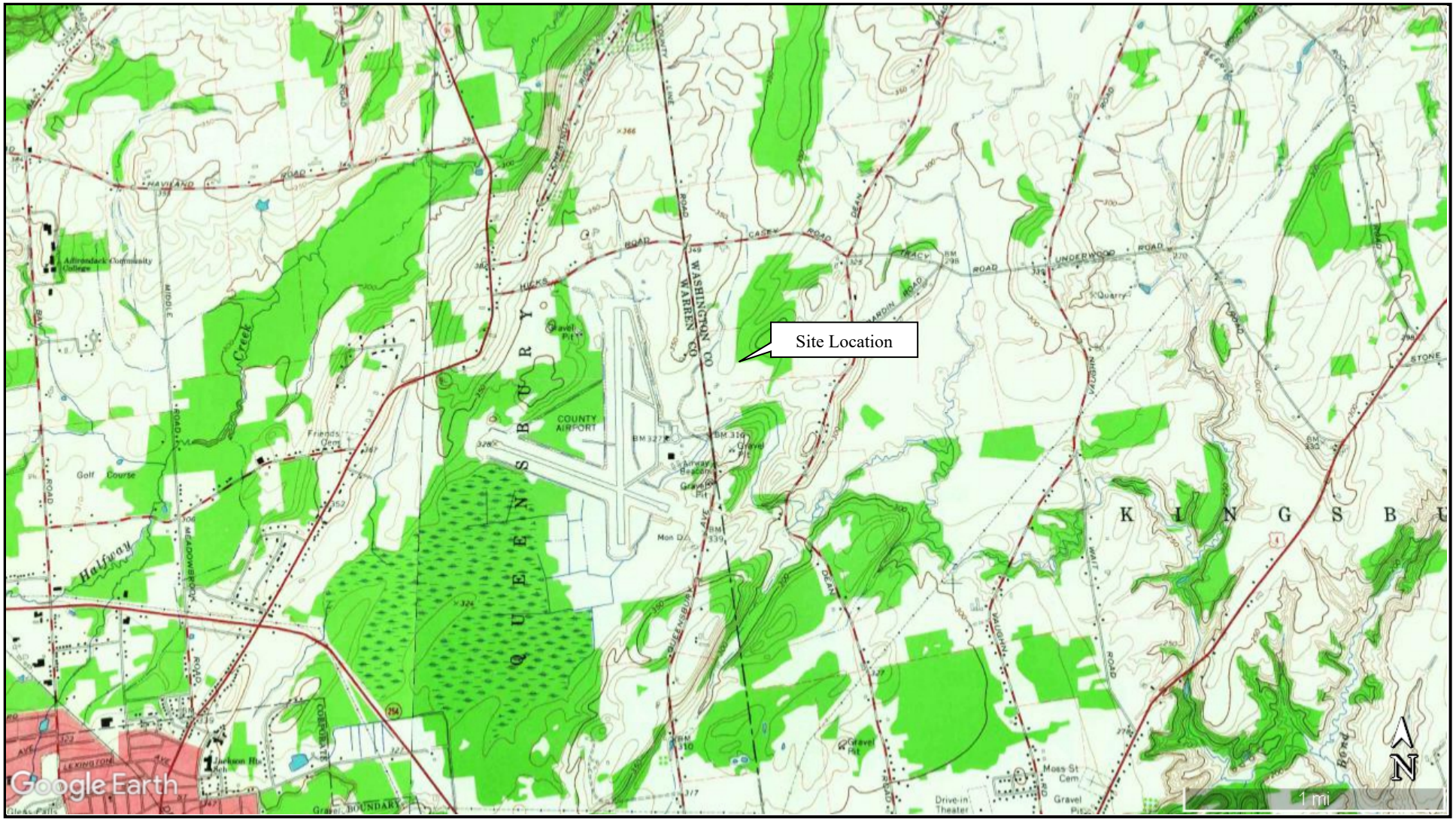

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Figure 1
Site Location Map
65 Park Road
Kingsbury, New York

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Figure 2
Storm Water and Sediment Vacuum Removal Location Map
65 Park Road
Kingsbury, New York