

VIA e-mail: gwprisco@gw.dec.state.ny.us

**Environmental
Resources
Management**

24 October 2018

Mr. Gary Priscott
New York State Department of Environmental Conservation
Region 7
1679 Route 11
Kirkwood, New York 13795-9772

5784 Widewaters Parkway
Syracuse, NY 13214
(315) 445-2554
(315) 445-2543



RE: Emerging Contaminate Sampling Plan- October 2018
Robintech/Compudyne, Inc. Site
Sanmina Corporation facility, Owego, New York
NYSDEC Site No. 754007

Dear Mr. Priscott,

On behalf of Sanmina Corporation (Sanmina), ERM has prepared this response to the New York State Department of Environmental Conservation (NYSDEC) letter dated 11 June 2018, which is a request for Sanmina to sample groundwater for emerging contaminants 1,4-dioxane and per- and polyfluoroalkyl substances (PFAS). Sanmina discussed the request with the NYSDEC and it was agreed the requested sampling will be completed during the October 2018 PMP sampling event.

1,4-dioxane is a solvent that was used for a variety of applications and is most often associated with its use as stabilizer for 1,1,1-TCA. There is a potential for 1,4-dioxane to be present in groundwater collected from monitoring wells where 1,1,1-TCA has been detected. ERM evaluated the PMP data and identified monitoring wells that contain 1,1,1-TCA and proposes that these wells are used to screen the Site for both 1,4-dioxane and PFAS. These wells are distributed across the Site and will provide vertical and horizontal coverage to screen the Site for the potential presence of 1,4-dioxane and/or PFAS. Table 1 summarizes the rationale for each of the monitoring wells that are proposed, the screen intervals of the wells, and the proposed sampling method.

ERM will complete the PMP sampling as approved by the NYSDEC using the PDBs to monitor for VOCs. PDBs do not have an adequate volume or the diffusion characteristics to allow PFAS or 1,4- Dioxane to be sampled using this method. In addition, PDBs are constructed of low-density polyethylene (LDPE) films and have a protective LDPE mesh around the bags to protect them from abrasion when installed.

LDPE has the potential of contain PFAS; therefore, there is the potential for the PDBs to inadvertently introduce PFAS into a sample or groundwater. Following the PMP sampling, each of the monitoring wells will be low-flow purged and sampled following the protocols outlined in the NYSDEC's request letter. At minimum, two well volumes will be removed during the low-flow purging of each well to minimize sampling of groundwater that has been in contact with the PDBs (i.e. to reduce the likelihood of inadvertent introduction of PFAS to a sample). Three recovery wells are included in the proposed sampling event; these wells will be sampled using the sampling ports on the treatment system. Samples will be collected by personnel with PFAS sampling experience who are knowledgeable of the precautions that must be taken to avoid sample cross contamination and as outlined in the NYSDEC's letter. Additionally, equipment rinsate blanks will be collected and analyzed for PFAS to demonstrate that sampling equipment is not introducing PFAS to the groundwater samples. Following the emerging contaminant sampling event new PDBs will be placed in the monitoring wells for the April 2019 PMP sampling event.

The analytical methods, reporting and validation requirement outlined in the NYSDEC's request letter will be followed. The data will be summarize in a letter report and submitted to the NYSDEC and New York State Department of Health.

If you should have any questions regarding this report or the proposed emerging contaminant sampling plan, please contact the undersigned at (315) 445-2554 or via e-mail rob.sents@erm.com.

The proposed schedule for sampling is the week of 22 October 2018.

Sincerely,



Rob Sents
Senior Project Manager

Enclosures:

Table 1 - Proposed Emerging Contaminate Sampling Event

cc: Julia Kenney, NYSDEC
Johannes Peeters, Tioga County Department of Health

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Maureen Schuck, NYSDOH
Harry Warner, NYSDEC
Earl Kimble, Sanmina
Khalid Ruhallah, Sanmina
Ernie Rossano- ERM

**TABLE 1: PROPOSED EMERGING CONTAMINATE SAMPLING EVENT
 FORMER ROBINTECH/COMPUDYNE, INC. SITE
 NYSDEC SITE NO. 754007
 ERM PROJECT NO. 0446988**

Monitoring Well ID	Screened Zone	PMP Well	Reasoning and Sampling Method
MW-4	Shallow Overburden	No	Upgradient, low-flow sampling
MW-6	Shallow Overburden	Yes	1,1,1-TCA detected in groundwater; low-flow sampling
MW-8	Shallow Overburden	No	Shallow conditions near western property boundary; low flow sampling
MW-34	Shallow Overburden	Yes	1,1,1-TCA detected in groundwater; low-flow sampling
RW-4	Shallow Overburden	Yes	1,1,1-TCA detected in groundwater; treatment system sampling port
MW-14	Deep Overburden	Yes	1,1,1-TCA detected in groundwater; low-flow sampling
MW-15A	Deep Overburden	Yes	1,1,1-TCA detected in groundwater; low-flow sampling
MW-27	Deep Overburden	Yes	1,1,1-TCA detected in groundwater; low-flow sampling
MW-32	Deep Overburden	Yes	1,1,1-TCA detected in groundwater; low-flow sampling
RW-3	Deep Overburden	Yes	1,1,1-TCA detected in groundwater; treatment system sampling port
RW-6	Bedrock	Yes	1,1,1-TCA detected in groundwater; low-flow sampling
MW-36	Bedrock	Yes	1,1,1-TCA detected in groundwater; treatment system sampling port