



November 14, 2019

Reference No. 11201415-20

Mr. David Locey
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 9
270 Michigan Avenue
Buffalo, NY 14203

Dear Mr. Locey

Re: Letter Work Plan for Proposed Groundwater and Surface Water Sampling at the Former Westinghouse Site at the Buffalo Niagara International Airport for CBS Corporation (Site), Site No. 915066, Cheektowaga, New York

In response to a request from the New York State Department of Environmental Conservation (NYSDEC) for CBS Corporation (CBS) to perform an additional sampling event to collect groundwater and surface water samples from the existing monitoring network at the above Site, GHD has prepared this Work Plan for CBS detailing the work to be performed and the procedures to be used to complete this additional sampling event.

The work to be performed will be consistent with the multiple rounds of post-closure sampling performed at the Site from 2014 to 2016 following closure of the OU-2 groundwater collection and treatment system in accordance with to the Closure Work Plan Revision 1 dated December 2, 2013, which was approved by the NYSDEC on January 27, 2014.

Figure 1 shows the location of the groundwater monitoring wells and the Niagara Frontier Transportation Authority (NFTA) Storm Water Sampling locations.

Some of the sampling locations are located within the secure area of the airport operations. Work in these areas will require an escort by NFTA personnel from the NFTA Facilities Maintenance Department.

SCOPE OF WORK

Groundwater Sampling

Groundwater samples will be collected from the ten existing groundwater monitoring wells identified as: MW-2, MW-5, MW-28, MW-30, MW-31, MW-32, MW-33, MW-34, MW-34D, and MW-35.

The sampling will be performed using low flow methods. A peristaltic pump will be used to pump the groundwater through a flow-through cell connected to a multi-parameter meter used to measure pH, specific conductance, temperature, oxidation-reduction potential, dissolved oxygen, and turbidity during purging of the well. Water levels will be measured during purging to monitor drawdown of the well. Samples will be collected when the field parameters have stabilized within acceptable limits. All field measurements will be recorded on appropriate field forms to be provided as part of the final report. The



field instruments will be field calibrated before use. A blind duplicate sample and laboratory quality control samples will be provided. Samples will be shipped by overnight courier under chain of custody. A trip blank will accompany the sampling activities and will be returned to the laboratory for analysis.

Groundwater samples will be analyzed for the Site-specific volatile organic compounds (VOCS); cis-1,2-dichloroethylene; 1,1,1-trichloroethane; trichloroethylene; vinyl chloride; and toluene and for the Site-specific total metals, total lead, and total cadmium. All samples are to be analyzed by Eurofins TestAmerica in Pittsburgh, Pennsylvania using Standard Method 624 for analysis of VOCs and United States Environmental Protection Agency (USEPA) Method 200.7 for analysis of total metals.

Surface Water Sampling

Surface water samples will be collected from ten collection points on NFTA storm sewer system downstream of the former groundwater collection system as shown on Figure 1. These locations include manholes and catch basins, which were designated as sampling locations MH-1A, MH-1B, MH-1C, MH-2A, MH-2B, MH-2C, MH-2D, MH-3A, MH-3B, and MH-3C.

The storm water samples will be collected as a grab sample using dedicated and disposable dipper cups and bailers. Indications of flow will be noted during sample collection, but no flow measurements will be performed. Sediment presence will be noted. A field measurement for pH will be performed as part of sample collection. All field measurements and observations will be recorded on appropriate field forms to be provided as part of the final report. The pH meter will be field calibrated before use. A blind duplicate sample will be collected, and a triplicate volume sample for internal laboratory quality control analysis (matrix spike/matrix spike duplicate [MS/MSD]) will be provided. Samples will be shipped by overnight courier under chain of custody. A trip blank provided by the laboratory will accompany the sampling activities in the field and will be returned to the laboratory for analysis.

Surface water samples will be analyzed for the Site-specific VOCS, cis-1,2-dichloroethylene; trichloroethylene; tetrachloroethylene; vinyl chloride; methylene chloride; 1,2-dichlorobenzene; and toluene and for the Site-specific total metals, total lead, total chromium, and total cadmium. Additional samples will be collected for total suspended solids and pH. A pH measurement will also be taken in the field. All samples are to be analyzed by Eurofins TestAmerica in Pittsburgh, Pennsylvania using Standard Method 624 for analysis of VOCs and USEPA Method 200.7 for analysis of total metals.

Sample Handling, Record Keeping, and Chain of Custody

Sample containers and shipping coolers are provided by the analytical laboratory. The sample containers are pre-preserved with the appropriate sample preservative.

Sample containers are to be labeled in the field by a unique sample identification code containing the following: sample matrix-project number-sample date-sample number. The sample labels will also show the analysis required, preservative, date and time of sampling, and the sampler's initials.

Following collection, the filled and labeled sample containers will be packaged in wet ice inside a heavy-duty plastic bag placed inside an insulated plastic cooler. The plastic bags will be sealed before



shipping of the samples to prevent water leakage. The cooler will serve as the shipping container. A completed chain of custody form will be placed in a separate waterproof sealed bag inside the cooler with the samples. The sampler will retain at least one copy of the chain of custody. The cooler will remain in the control of the sampling personnel until the coolers are sealed for shipment to the laboratory. The sample coolers will be securely sealed using strapping ribbon. A separate custody seal will be attached across the lid and side of the cooler to document the cooler is not opened during shipment. The cooler will be shipped by the sampler by commercial overnight courier to the laboratory.

Copies of all documents generated during sampling, including pre-planning checklists, the tailgate safety meeting form, chain of custody forms, a field sample key, field sampling data sheets and measurements pages, a field daily activities summary log, and instrument calibration records will be included as part of a field summary report to be provided to CBS following sampling activities. The original documents will be retained at the GHD Office in Niagara Falls, New York.

Water Level Measurement

Water levels will be measured at each monitoring well and at each storm water sampling location from the top of the well riser or manhole rim to the top of the water column using an electronic water level meter. Measurements will be obtained to +/- 0.01 foot accuracy.

Equipment Decontamination

All non-dedicated and non-disposable sampling equipment and field instruments will be cleaned before use at the Site. Any sampling equipment or water level equipment that comes in contact with the water being sampled, which is to be reused at another location, will be cleaned with a soapy water wash and rinsed with tap water and then deionized water. Equipment decontamination water will be collected and added to the buckets containing the groundwater purge water.

Investigation Derived Waste

The purge water collected during groundwater sampling activities will be contained in 5-gallon plastic buckets. These purge water containers will be transferred to the NFTA maintenance personnel for disposal into their glycol wetland used for biological treatment of airport deicing area runoff liquids.

Sampling generated wastes (e.g., rubber gloves, used sample tubing, used bailers, rope, paper waste, etc.) will be contained in sealed plastic garbage bags and will be disposed to a waste dumpster at the GHD office in Niagara Falls, New York. Waste from this dumpster is transported by Modern Disposal to their municipal solid waste landfill in Niagara Falls, New York.

Analytical Data Reporting and Validation

Eurofins TestAmerica is to provide a Category B deliverables package of the analytical results to GHD. Eurofins TestAmerica is also to provide a copy of the analytical reports as an electronic data deliverable (EDD) for subsequent submittal to the NYSDEC EQulS™ database in accordance with the requirements found at this link, <http://www.dec.ny.gov/chemical/62440.html>.



A data validation will be performed on the data to determine if the data is acceptable for use and if any qualification is necessary. A memorandum detailing the results of the validation will be included with the summary report.

Work Schedule

We anticipate this work to start within 2 weeks of receipt of acceptance of this Work Plan by the NYSDEC. The date of the work must be coordinated with the NFTA for Site access and is very weather dependent. NYSDEC will be notified by email of the anticipated sampling date. Sampling activities will take 1 day to complete.

Please let me know if you have any questions.

Sincerely,

GHD

A handwritten signature in blue ink, appearing to read 'Kevin Lynch', with a long horizontal flourish extending to the right.

Kevin Lynch

KL/adh/1

Encl.

cc: Chad Staniszewski, NYSDEC
Dean Reed, CBS

