



AECOM  
257 West Genesee St.  
Suite 400  
Buffalo, NY 14202-2657  
www.aecom.com

716 856 5636 tel  
716 856 2545 fax

November 10, 2017

Mr. Glenn M. May, CPG  
Environmental Geologist II  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 9  
270 Michigan Avenue  
Buffalo, NY 14203-2915

RE: **VAPOR INTRUSION EVALUATION  
FORMER CHEMICAL LEAMAN TANK LINES FACILITY, SITE NO. 9-15-014  
TONAWANDA (C), ERIE COUNTY, NY**

Dear Mr. May:

In a letter dated February 10, 2017, the New York State Department of Environmental Conservation (NYSDEC) provided comments on the draft Site Management Plan (SMP) that AECOM submitted for the former Chemical Leaman Tank Lines facility. One of the NYSDEC comments was related to the possibility of vapor intrusion (VI):

- Evaluate the potential for vapor intrusion for all current site buildings and any developed in the future, including provision for mitigation of any impacts identified.

In subsequent discussions between AECOM and the NYSDEC regarding their comments to the draft SMP, the NYSDEC suggested that a written evaluation be prepared to assess the potential for VI to occur in the Site buildings.

AECOM has prepared this letter, on behalf of Quality Distribution, Inc. (QDI), to address this issue.

### **Site Features/Background**

There are currently four buildings located on site; 1) the former waste water treatment building, 2) the former drum storage area, 3) the truck wash/service bays, and 4) the office building (Figure 1). All buildings are concrete slab-on-grade construction. The former waste water treatment and drum storage area buildings are no longer used and are unoccupied. The truck wash/service bays building and office building are the only occupied buildings.

If VI were to occur at the Site, it would involve specifically the "Office" and the "Truck Wash Bays" located in the northeast corner of the property. The Office is one story and only occupied during business hours. The Truck Wash Bays is a two-story structure, but is not occupied full-time, even during business hours. And when vehicles are being washed the bay doors are usually open.

Historically, groundwater has been encountered at the Site between 3-8 feet below grade. Flow is predominantly to the south toward Ellicott Creek, with some mounding observed at times in the former lagoon vicinity (Figures 2 and 3).

### **Soil Contamination**

During previous investigations, three areas of the Site, identified as Operable Units 1, 2, and 3 (Figure 4) exhibited evidence of soil contamination (Figures 5, 6, and 7). Volatile organic compounds (VOCs) were the primary constituents of concern. When the laboratory analytical results of the soil

samples were compared to the NYSDEC's 6NYCRR Part 375 commercial soil cleanup objectives (SCOs), exceedances were noted as follows:

- two sample locations within Operable Unit 1 (14-24 feet below ground surface),
- three sample locations within Operable Unit 2 (3-8 feet below ground surface),
- two sample locations within Operable Unit 3 (2-4 feet below ground surface).

Because of the depth of the contamination in Operable Unit 1 it was decided to treat it in March 2015 with nutrient injections to promote enhanced bioremediation. The contamination in Operable Units 2 and 3 was excavated in May 2015 and disposed of off-Site. Confirmation soil samples indicated no exceedances of Part 375 commercial SCOs in Operable Units 2 or 3 following excavation. Additional groundwater sampling has been proposed for Operable Unit 1 to check on the effectiveness of the remedy.

### **Groundwater Contamination**

As indicated in previous investigations, groundwater in the vicinities of the Operable Units was impacted by VOCs at concentrations that exceeded Class GA groundwater standards (Figure 8). However, the last time site-wide groundwater was sampled at the Site was June 2004 and potential source areas have since been excavated or treated by remedial injection. As discussed below, the groundwater contamination was basically downgradient of the Site buildings.

### **VI Evaluation**

The soil contamination encountered in Operable Units 2 and 3 was effectively remediated to less than Part 375 commercial SCOs through excavation/removal/disposal. The soil contamination encountered in Operable Unit 1 was addressed in March 2015 and the progress will be checked during the proposed follow-up groundwater sampling. Regardless, the soil contamination in all three Operable Units was basically downgradient from the Site buildings, especially the Office, which is the only Site building to be consistently occupied during business hours.

According to ASTM International Guide E2600–15: *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*, Section 9.2, the critical distance between the contamination and the “target property” (i.e., Site buildings) is 100 feet for soil contaminants and 30 feet for dissolved-phase groundwater contaminants. If the critical distance is greater than that, which it appears to be in this case, then it could be argued that vapor migration to the Site buildings is unlikely. As an example, GP-04WA (6'-8'), which was the “hottest” sample location within Operable Unit 2 before it was excavated, was a minimum of 150 feet from the Truck Wash Bays and approximately 200 feet from the Office.

For groundwater, monitoring well B-01 provides the best comparison. In June 2004, benzene was detected at a concentration of 16.4 micrograms per liter (µg/L). The well lies approximately 125 feet from the Truck Wash Bays and more than 150 feet from the Office, basically downgradient (particularly for the Office), and well outside the 30 feet recommended by ASTM E2600-15. In addition, hydrocarbons typically will decay in the vadose zone and, therefore, do not pose a significant risk of VI.

Taking into account all these factors:

- the severity and extent of past (known) contaminants,
- the remedial efforts to date,
- groundwater flow direction at the Site, and



- the location of the Site buildings in relation to the past (known) contaminant areas, both with respect to distance and orientation (i.e., upgradient/downgradient),

AECOM and QDI feel it unlikely that VI would be an issue in the Site buildings under the present conditions.

If you have any questions regarding this evaluation, please do not hesitate to contact me at (716) 923-1157 or Colin Wasteneys at (716) 923-1164.

Sincerely,

**AECOM Technologies, Inc.**

A handwritten signature in blue ink that reads "David H. Coulter". The signature is written in a cursive style with a large, stylized "C" at the end.

David Coulter, PG  
Task Manager

A handwritten signature in blue ink that reads "Colin Wasteneys". The signature is written in a cursive style with a large, stylized "W" at the end.

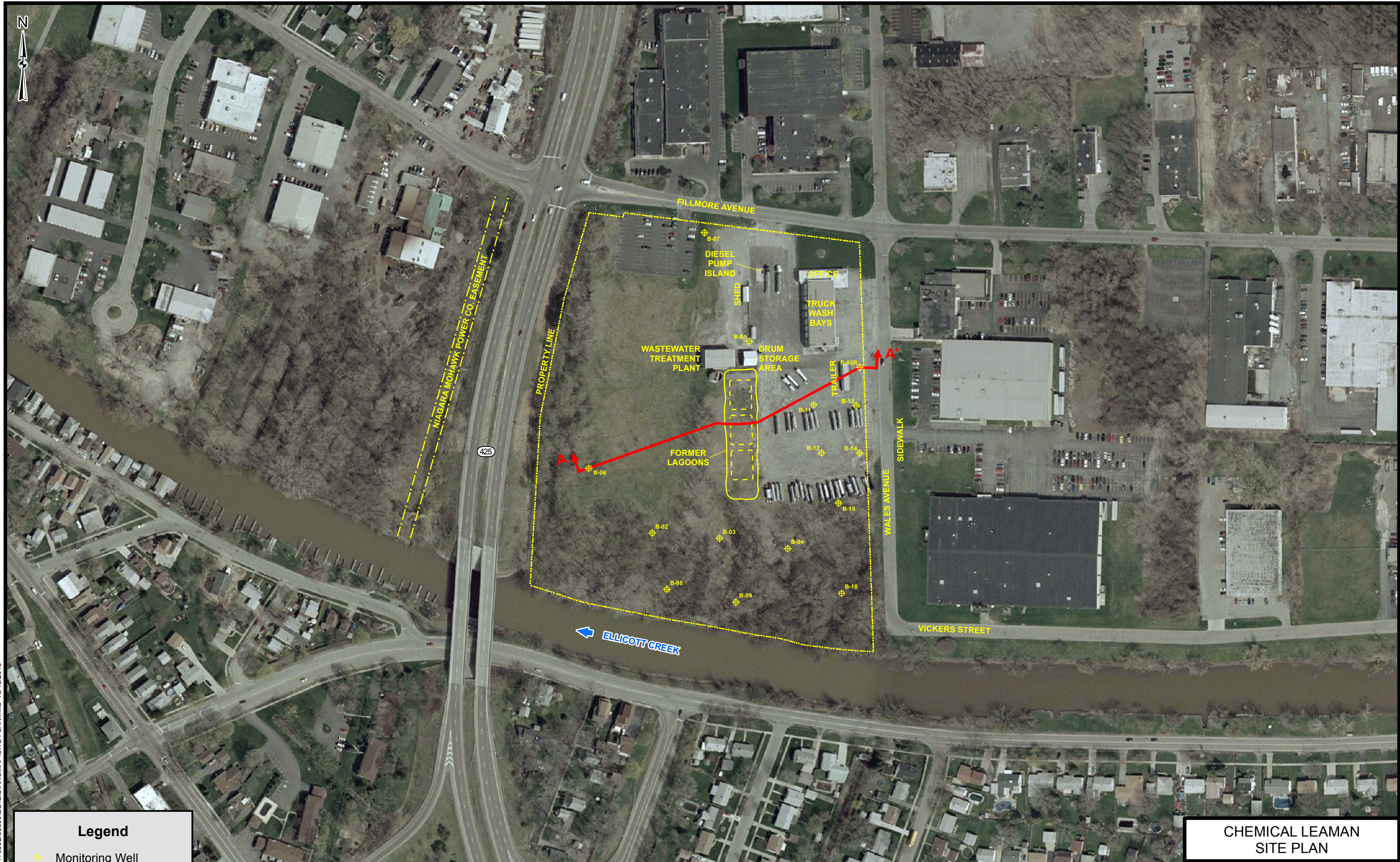
Colin Wasteneys, PG  
Sr. Project Manager

Enclosures

## FIGURES




J:\Projects\11170332.00000\DB\GIS\ARCMAP\SITE PLAN.mxd 10/15/2015

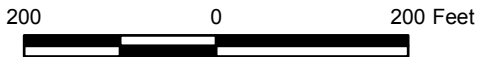


Legend

 Monitoring Well

 Geologic Cross Section

Source: NYS Office of Cyber Security, 2002



CHEMICAL LEAMAN  
SITE PLAN


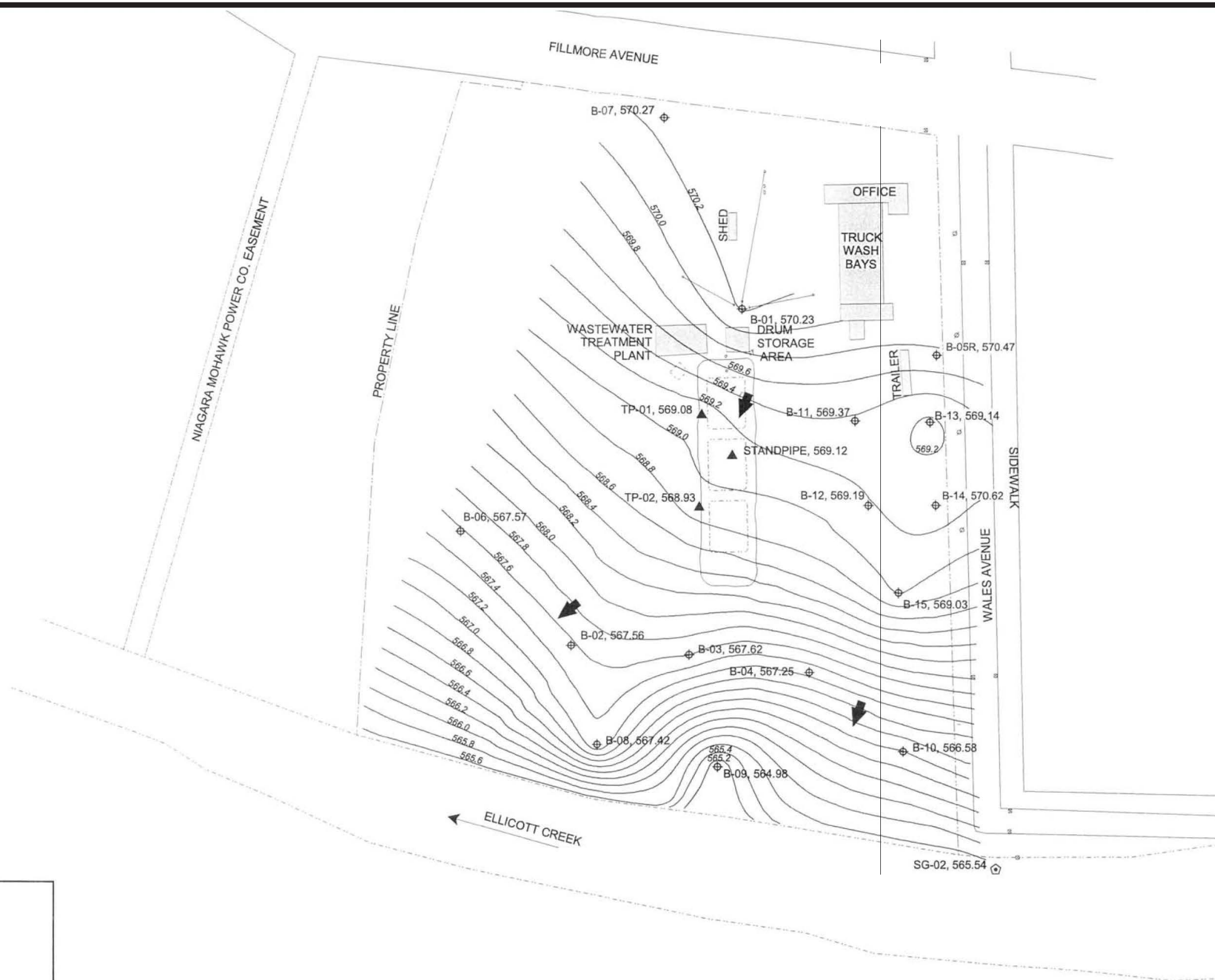
 **AECOM**

FIGURE 1





### Legend

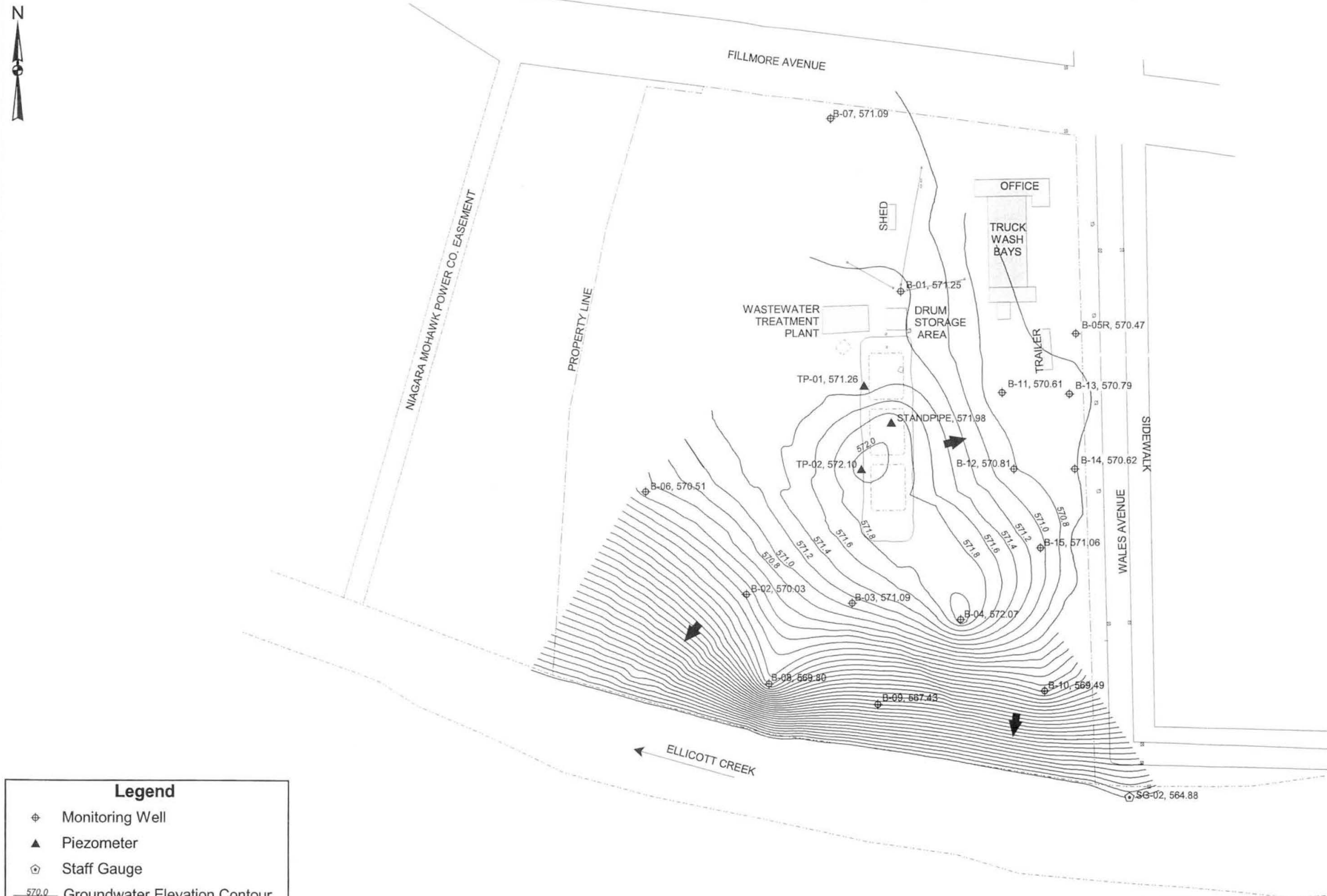
- ⊕ Monitoring Well
- ▲ Piezometer
- ⊙ Staff Gauge
- 570.00 Groundwater Elevation Contour
- ← Groundwater Flow Direction
- Location ID — B-02, 567.56
- Groundwater Elevation (ft)

150 0 150 Feet

CHEMICAL LEAMAN  
GROUNDWATER ELEVATION CONTOUR MAP  
(JULY 22, 2004)

**AECOM**

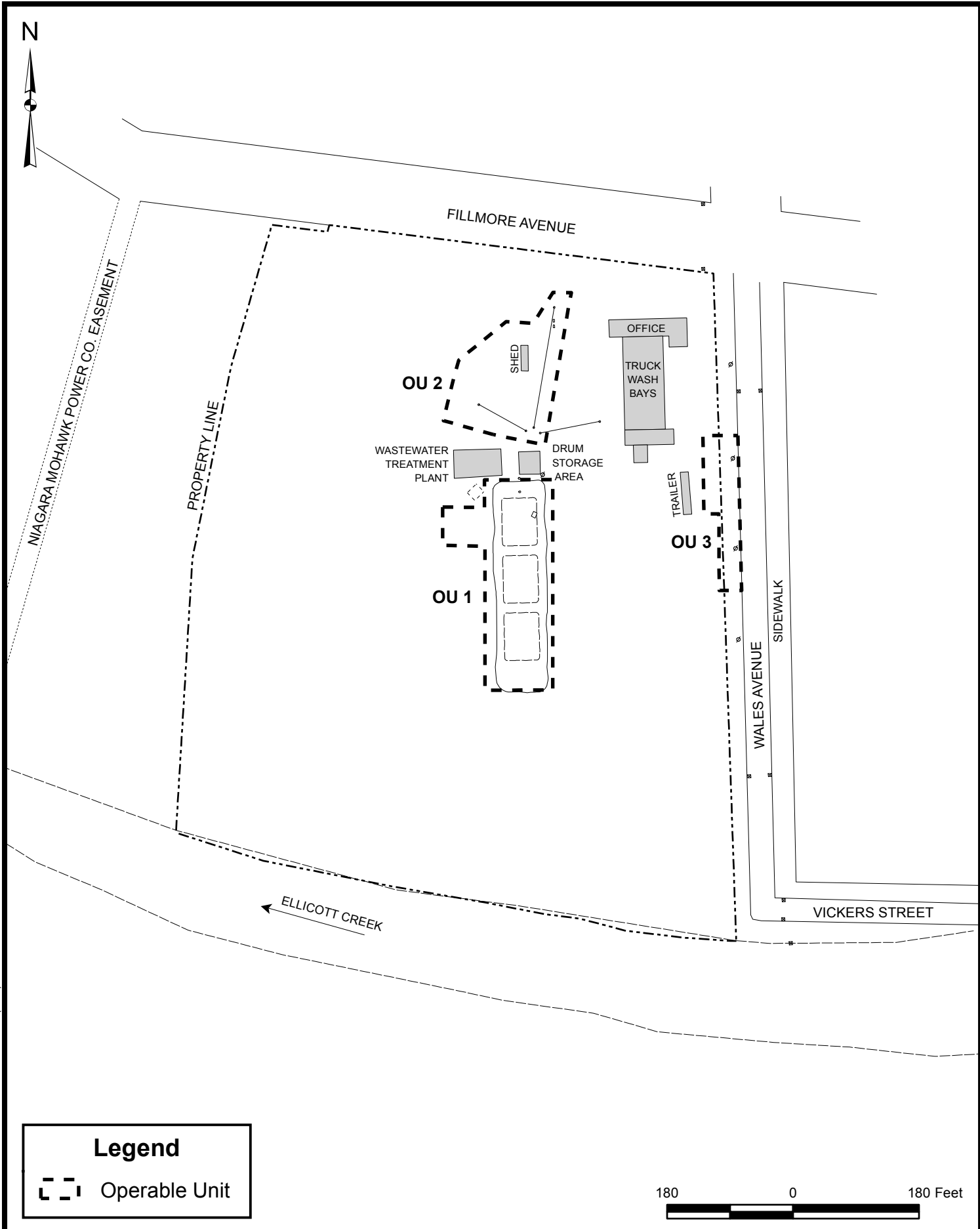
FIGURE 2



CHEMICAL LEAMAN  
 GROUNDWATER ELEVATION CONTOUR MAP  
 (MAY 3, 2004)

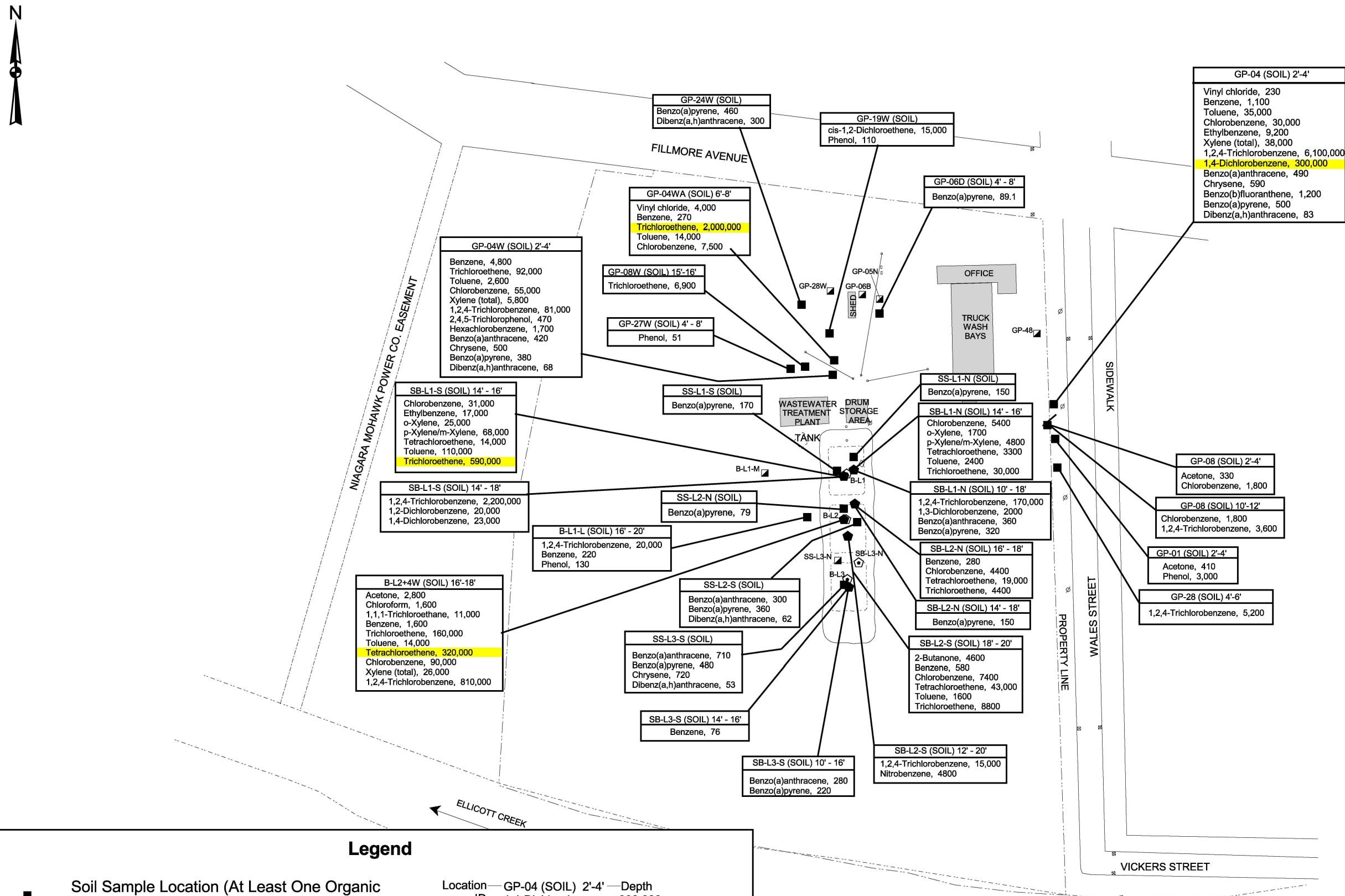


FIGURE 3





NA11170332.000001DB\GIS\chem\_leaman.apr ORGANIC COMPOUND EXCEEDENCES 11X17.3 5/25/2010



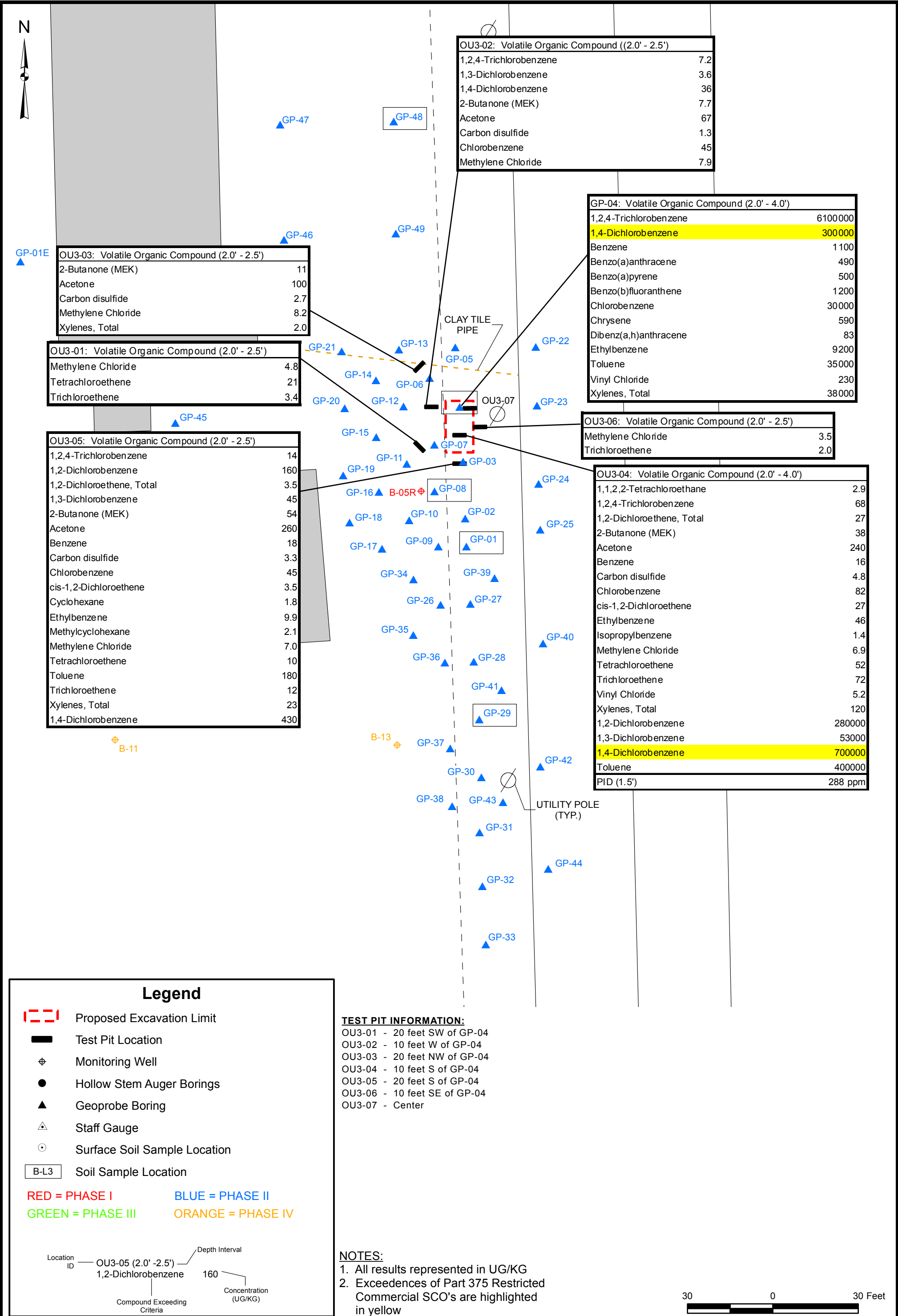
CHEMICAL LEAMAN  
ORGANIC COMPOUND EXCEEDENCES  
IN RI SOIL SAMPLES

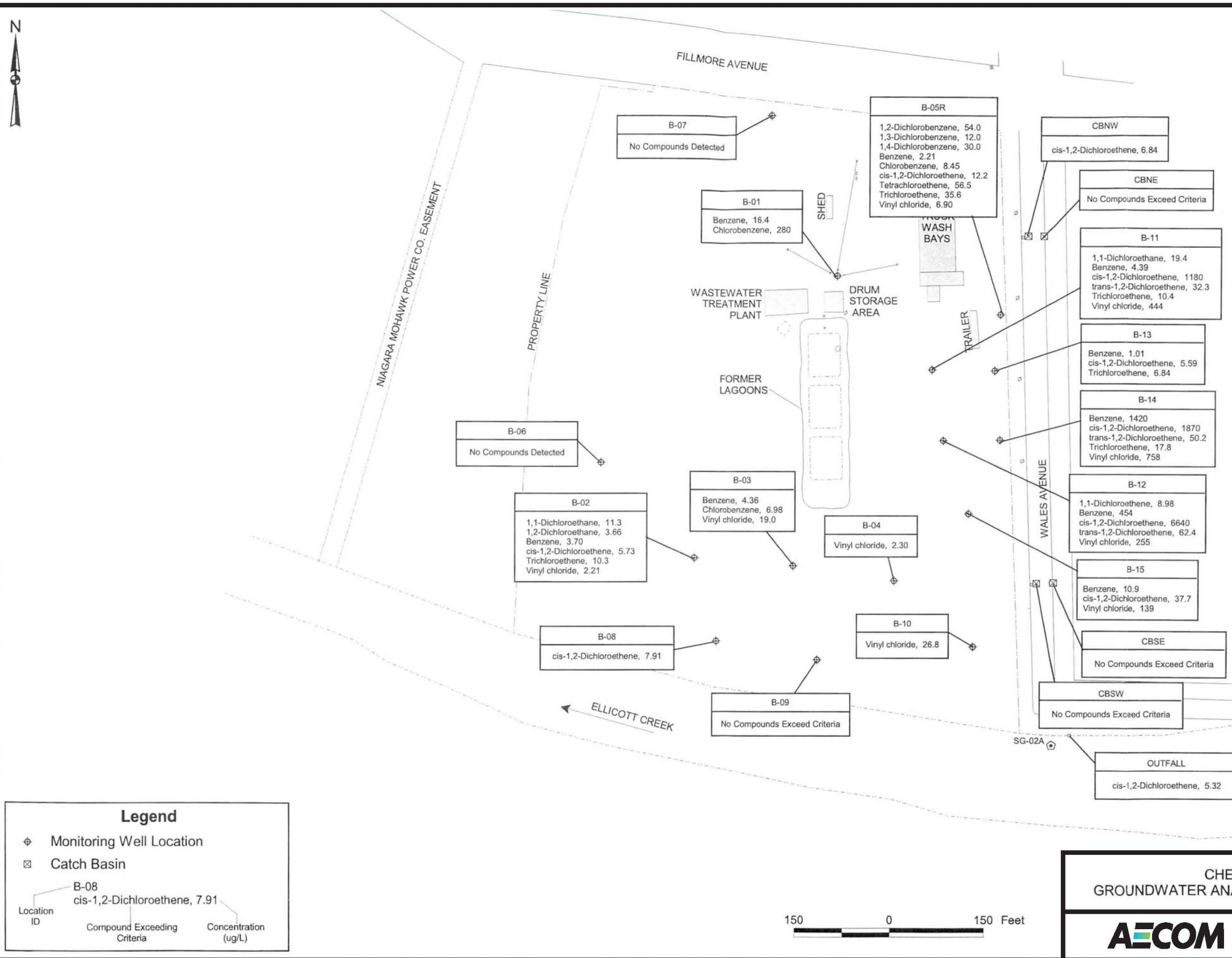


FIGURE 5









CHEMICAL LEAMAN  
GROUNDWATER ANALYTICAL RESULTS (JUNE 2004)