BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

December 19, 2007

Mr. Jaspal Walia
New York State Department of
Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203-2999

Re: 3773 Lake Shore Road, Blasdell, NY
Area A – Underground Storage Tank
Pre-Remedial Site Investigation Report and Remedial Work Plan

Dear Mr. Walia:

In accordance with our September 24, 2007 Pre-Remedial Site Investigation Work Plan, Benchmark has completed underground storage tank (UST) investigation activities to delineate the extent of impacted soil/fill in Area "A" of the subject Site (see Figure 1). Descriptions of our approach to the work and investigation findings are presented below. Areas investigated and discussed within this report are identified on Figure 2.

PRE-REMEDIAL INVESTIGATION

Pre-Remedial Investigation Work Plan

A November 2006 Phase II report prepared by Hazard Evaluations, Inc. (HEI) reported that during the course of the Phase II investigation work an estimated 500 gallon UST was uncovered at approximately 4 feet below ground surface (fbgs). The contents, use, and prior history of this UST are unknown. According to HEI, the UST appeared to be filled with a sand material. The open excavation was secured with safety fence and metal spikes. HEI collected a sample from the soil/fill beneath the tank (approximately 9 fbgs). Toluene was detected at a concentration of 20.3 parts per million (ppm); the NYSDEC TAGM 4046 Recommended Soil Cleanup Objective (RSCO) for toluene is 1.5 ppm but the NYSDEC Part 375 RSCO for toluene is 500 ppm for commercial use and 1,000 ppm for industrial use.

As the aerial extent of the soil/fill impacts had not been determined through HEI's work, Benchmark prepared a Pre-Remedial Site Investigation Work Plan to better determine the quantity of soil potentially requiring remediation. The Work Plan proposed direct-push test borings in the soil/fill surrounding the UST. Soil removed from the direct-push boring sleeves was to be field-screened using a MiniRae 2000 photoionization detector (PID) fitted with a 10.6 eV lamp (or equivalent) and logged for visual/olfactory evidence of contamination. Borings were slated to continue outward based on visual/olfactory evidence or PID screening until the approximate

area of impact was delineated. The Work Plan called for collection of a sample for VOC analysis if persistently low PID readings (i.e., 5 ppm) were obtained.

On October 19, 2007 Mr. Jaspal Walia of the NYSDEC conveyed verbal approval of the Work Plan to Mr. Thomas Forbes of Benchmark.

Investigation Approach

On October 24, 2007, Benchmark conducted a one-day investigation program using a direct push Geoprobe® rig to advance boreholes for assessment of subsurface conditions. Seven borings (designated B-6 through B-12 to continue the prior site boring numbering scheme) were advanced to approximately 8 to 12 fbgs at the locations shown on Figure 2. Each boring was advanced using a 1.5-inch diameter, 4-foot core sampler equipped with a PVC sleeve. Recovered samples were described in the field using the Unified Soil Classification System (USCS), scanned for total volatile organic vapors with a calibrated MiniRae 2000 photoionization detector (PID) equipped with a 10.6 eV lamp, and characterized for impacts via visual and/or olfactory observations. PID measurements were collected at a minimum frequency of one per each 4-foot spoon. Attachment 1 contains the field geoprobe borehole logs.

Since soil/fill excavated from around the tank was stockpiled north of the excavation, no borings could be advanced through this area. Accordingly, on November 9, 2007, Benchmark mobilized a mini-excavator to the Site and investigated the north wall of the tank excavation (see Figure 2). The excavator bucket was used to scrape the sloped north sidewall of the excavation and retrieve representative soil for PID screening. Attachment 2 contains representative photographs of the excavation activities.

Field Observations

As presented on Table 1, field PID readings were 0.0 ppm with the exception of a PID reading of 2.8 ppm in boring B-7 at a depth of 8-10 fbgs. Boring B-9, located approximately 10 feet from B-7 in the same compass direction, exhibited a PID reading of 0.0 ppm. Since all PID readings were less than 5.0 ppm, no soil/fill samples were collected. Following soil/fill logging and screening, all borings were backfilled with the soil/fill cuttings to match the existing grade.

PID scans of the soils retrieved by the excavator on November 9 were measured at 0.0 ppm. None of the retrieved soils from the borings or excavator exhibited visual or olfactory evidence of contamination.

Investigation Summary and Conclusions

Based on visual/olfactory/PID observations of the soil/fill around the excavated tank, soil/fill analytical sampling was deemed unnecessary. The impact to the soil/fill and sand within and surrounding the UST appears to be localized and limited to approximately 75 cubic yards. Benchmark recommends removal of: the UST and its

contents; ancillary piping (if any); visually and/or olfactory impacted soil/fill surrounding the UST; and disposal of impacted soil/fill at a permitted off-site disposal facility. The recommended approach is described in greater detail below.

PROPOSED REMEDIAL APPROACH

The proposed remedial approach for the UST and impacted soil/fill is tank removal followed by soil/fill excavation and off-site disposal. The extent of the impact will be determined by visual, olfactory, and PID scan observations performed by experienced Benchmark personnel with confirmatory samples collected to assure conformance with cleanup objectives.

Utility Clearance and Disposal Approval

The regional Underground Utilities Locating Service (UUL) will be contacted by Benchmark a minimum of three business days in advance of the work and informed of the intent to perform UST removal and soil/fill excavation work at the Site. Intrusive activities will not begin ahead of the date reported to UUL. If underground utilities are present in the vicinity of the UST and are anticipated to interfere with the removal work, the NYSDEC will be contacted to discuss mitigating measures. In addition, Benchmark will secure approval for disposal of the material at a permitted offsite facility. A supplemental sample may be collected for waste profile analysis if required by the disposal facility.

UST and Piping Removal

The Contractor will remove the contents of the exposed 500-gallon UST and direct load it into a dump trailer or tandem truck, or place it on poly sheeting adjacent to the excavation for disposal. The UST and any associated piping will be removed from the excavation and cleaned. Excess rinsate water from the cleaning process will be contained in DOT-approved 55-gallon drums and removed from the Site for proper disposal. The cleaned tank and piping will be cut into manageable pieces and removed from the Site for scrap recycle. A scale receipt will be obtained from the scrap facility as proof of disposal and will be included with the final report.

Impacted Soil/Fill Removal

Previous studies have indicated that VOC-impacted soil/fill exists beneath the UST. Based on visual observations, olfactory evidence, and PID scans performed by Benchmark, soil/fill identified as "impacted" (i.e., visual staining, olfactory evidence, or PID readings above 5 ppm) will be excavated and direct-loaded into dump trucks or dump trailers immediately following UST removal. All excavation work will be directed by an experienced Benchmark scientist. Lateral and vertical excavation will continue against the above-described criteria until field observations indicate that the limits of the impact have been reached. The open excavation will be secured with safety fencing while awaiting backfill.

Groundwater Management

Based on field observations and the anticipated groundwater elevation, groundwater management is not expected to be necessary during UST and soil/fill removal activities. However, if significant groundwater is encountered during the excavation work it will be pumped to a temporary tank and treated on-site prior to discharge to grade (with permission from the NYSDEC). In general, water removed from excavation will be stored/settled in a portable tank and pumped through a bag or cartridge filter prior to treatment using granular activated carbon (GAC). Following completion of excavation work, settled solids remaining in the tank and spent filter bags will be disposed with the impacted soil/fill. The tank will be decontaminated via pressure washing, and wash waters will be processed through the GAC. Spent GAC will be characterized and regenerated off-site, or disposed at a permitted treatment, storage and disposal facility (TSDF) in accordance with applicable federal and state regulations.

Excavation Confirmation Sampling

Following excavation, a total of five confirmatory grab soil/fill samples will be collected; one from each of the four walls and one from the floor of the excavation. All samples will be analyzed by a National Environmental Laboratory Approval Program (NELAP) approved laboratory for toluene in accordance with USEPA Method 8021. Five-business day turnaround will be required for the analytical results to minimize the time that the excavation remains open. Confirmatory samples will be compared to NYSDEC TAGM HWR-94-4046 criteria for toluene (1.5 mg/kg).

Excavated Soil/Fill Disposal

Excavated soil/fill and stockpiled soil/fill not meeting the above-described criteria for reuse as backfill will be placed in dump trucks or dump trailers, covered, and transported by to a permitted offsite facility for proper disposal. Dump trucks or dump trailers will be employed and will be properly manifested and transported to the disposal facility by a licensed hauler. Scale receipts will be obtained as proof of disposal and will be included with the final report.

Excavation Backfill

Following NYSDEC concurrence that all impacted soil/fill has been removed, the resulting excavation will be backfilled. An estimated 30-40 cubic yards of soils from the top of the UST are presently staged adjacent to the excavation. These soils do not exhibit field indications of impact. Prior to initiating UST removal work, four representative samples will be collected from the pile (one from each of four quadrants) and analyzed for toluene in accordance with Method 8021. If the samples exhibit conformance with NYSDEC criteria for protection of groundwater quality per 6NYCRR Part 375 (i.e., 0.7 mg/kg), the associated soils will be assumed acceptable for reuse as backfill material in the excavation. Soil that meets the criteria for reuse as backfill will be placed and compacted with the excavator bucket in maximum two-foot

lifts. Steel slag backfill obtained under Beneficial Use Determination (BUD) #555-9-15 granted to Tecumseh Redevelopment, Inc. by the NYSDEC will be procured to supplement staged soils, as necessary. The steel slag backfill will be placed into the excavation and compacted with an excavator/backhoe bucket in 2-foot lifts to match the existing grade of the Site and minimize settling.

Community Air Monitoring

During excavation work, community air monitoring will be performed at the downwind site perimeter. Attachment 3 contains Benchmark's proposed Community Air Monitoring Plan.

Reporting

A closure report will be completed within 30 days of completion of remedial activities. The report will summarize the approach to the work; field and laboratory findings; data interpretation; and conclusions. A site schematic showing the area of excavation will be included with the report. Copies of all pertinent records, including PID readings, maps, field logs, photographs, and laboratory reports will be appended to the report. A digital copy will also be provided, if requested.

Project Schedule

The project schedule will be dependent on weather conditions and impacted soil/fill disposal approval. Benchmark will notify the NYSDEC of the planned schedule for remediation a minimum of two weeks ahead of performing the work. It is anticipated that once excavation is initiated the UST and soil/fill removal work will be completed with 3-4 business days, with backfill approximately 2 weeks following receipt of acceptable confirmatory sample results.

Please contact us if you have any questions or require additional information.

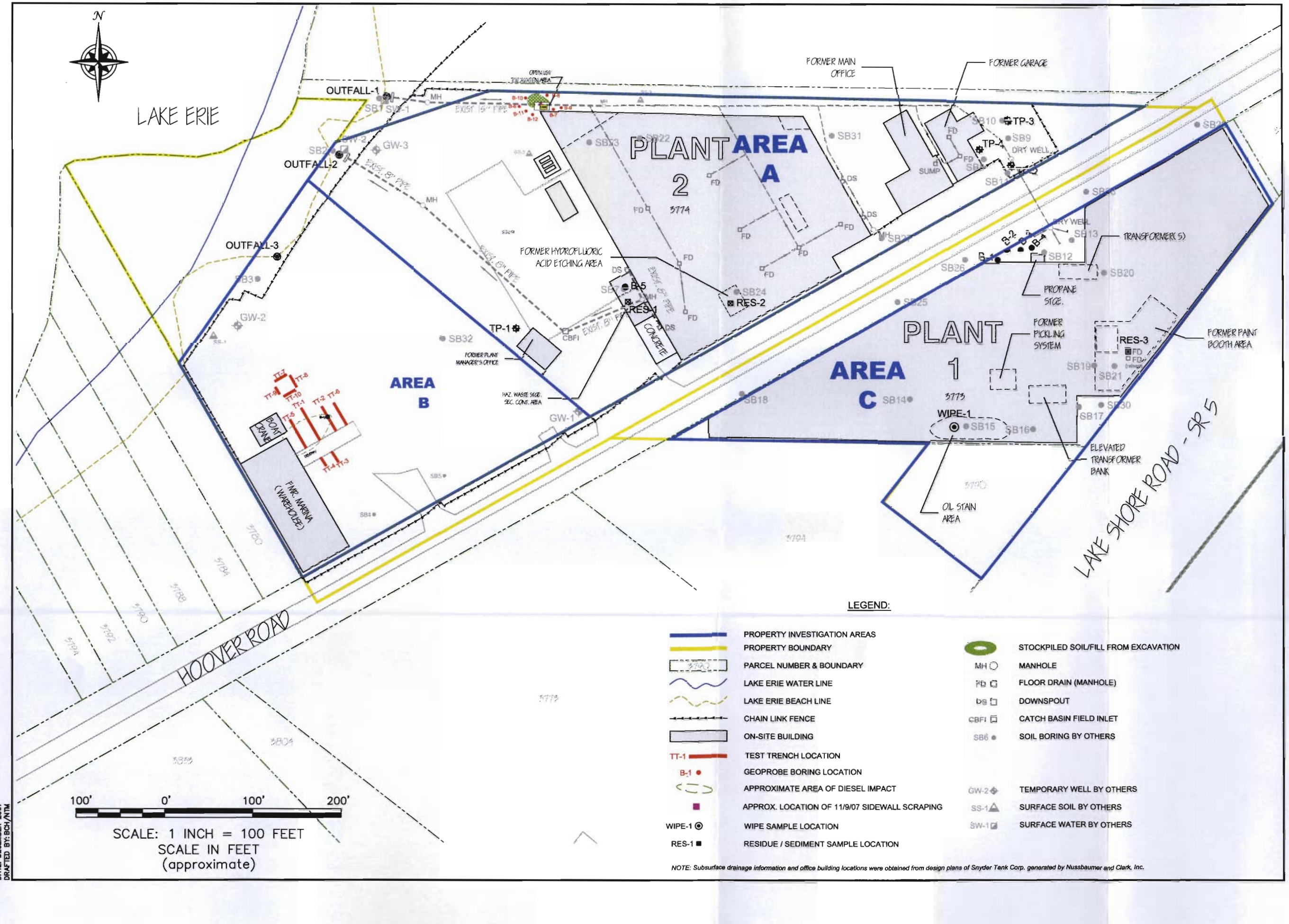
Sincerely,
Benchmark Environmental Engineering & Science, PLLC

Thomas H. Forbes, P.E.
Project Manager

c: N. Katz, Esq.
C. Slater, Esq.

Att.

FIGURES



LEGEND:

- PROPERTY INVESTIGATION AREAS
- PROPERTY BOUNDARY
- PARCEL NUMBER & BOUNDARY
- LAKE ERIE WATER LINE
- LAKE ERIE BEACH LINE
- CHAIN LINK FENCE
- ON-SITE BUILDING
- TT-1 TEST TRENCH LOCATION
- B-1 GEOPROBE BORING LOCATION
- APPROXIMATE AREA OF DIESEL IMPACT
- APPROX. LOCATION OF 11/9/07 SIDEWALL SCRAPING
- WIPE-1 WIPE SAMPLE LOCATION
- RES-1 RESIDUE / SEDIMENT SAMPLE LOCATION
- STOCKPILED SOIL/FILL FROM EXCAVATION
- MH MANHOLE
- FD FLOOR DRAIN (MANHOLE)
- DS DOWNSPOUT
- CBFI CATCH BASIN FIELD INLET
- SB6 SOIL BORING BY OTHERS
- GW-2 TEMPORARY WELL BY OTHERS
- SS-1 SURFACE SOIL BY OTHERS
- SW-1 SURFACE WATER BY OTHERS

NOTE: Subsurface drainage information and office building locations were obtained from design plans of Snyder Tank Corp. generated by Nussbaumer and Clark, Inc.

DATE: DECEMBER 2007
DRAFTED BY: BCH/ATM

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC
726 EXCHANGE STREET
SUITE 624
BUFFALO, NEW YORK 14210
(716) 856-0599

JOB NO.: 0109-001-100

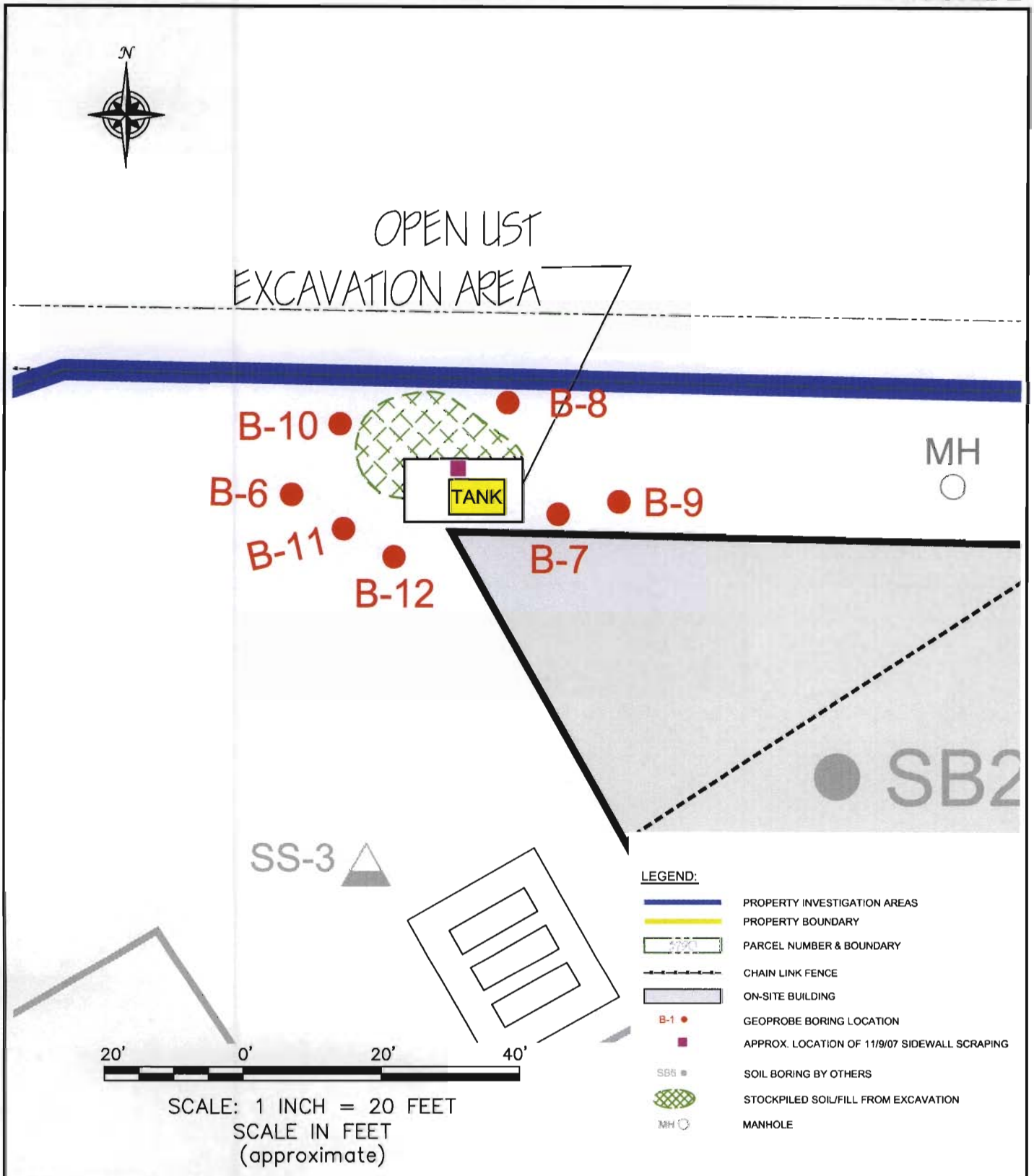
SITE PLAN

PRE-REMEDIAL SITE INVESTIGATION
3773 LAKE SHORE ROAD
HAMBURG, NEW YORK

PREPARED FOR
HARTER, SECREST & EMERY

FIGURE 1

FIGURE 2



BENCHMARK
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726 EXCHANGE STREET
SUITE 624
BUFFALO, NEW YORK 14210
(716) 856-0599

PROJECT NO.: 0109-001-100

DATE: DECEMBER 2007

DRAFTED BY: NTM

PRE-REMEDIAL SITE INVESTIGATION TEST TRENCH LOCATIONS

AREA A - UNDERGROUND STORAGE TANK

3773 LAKESHORE ROAD
HAMBURG, NEW YORK

PREPARED FOR
HARTER, SECREST, & EMERY

TABLES

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TABLE 1

PID SUMMARY

3773 LAKE SHORE ROAD
BLASDELL, NEW YORK

BORING INTERVAL (fbgs)	BORING LOCATION & PID FIELD SCAN READINGS (ppm)						
	B-6	B-7	B-8	B-9	B-10	B-11	B-12
0.0 - 2.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0
2.0 - 4.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
4.0 - 6.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
6.0 - 8.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
8.0 - 10.0	0.0	**2.8**	0.0	0.0	0.0	0.0	0.0
10.0 - 12.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Boring Terminus	12 fbgs	11.5 fbgs	8 fbgs	10.5 fbgs	12 fbgs	12 fbgs	12 fbgs

Notes:

1. fbgs= feet below ground surface

ATTACHMENT 1

FIELD GEOPROBE BOREHOLE LOGS

BENCHMARK
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FIELD GEOPROBE BOREHOLE LOG

Project Name: 3773 Lake Shore Road
Project Number: 0109 - 001 - 101
Client: Harter Secrest & Emery LLP
Drilling Company: Trec Environmental
Driller: Paul Willey
Helper: NA
Rig Type: Geoprobe

BORING NUMBER: B-6
Abandonment Method: ☐ Pressure Tremie ☑ Soil Cuttings
Start Date: 10/24/2007
End Date: 10/24/2007
Logged By: TAB
Drilling Method: Directpush
Weather: Partly cloudy mid 60s, wind 5-10 SW

Elevation (fmsl)	Depth (fbgs)	Sample No.	Recovery (feet)	SAMPLE DESCRIPTION (ASTM D2488) USCS Classification: Color, Moisture Condition, Primary Soil Type, Secondary Soil Type (<5% Trace, 5-10% Few, 15-25% Little, 30-45% Some), Structure (varved, stratified, thinly bedded, bedded, thickly bedded, laminated, fissured, blocky, lensed, massive), Consistency/Density (Standard Penetration Test, SPT), Weathering/Fracturing, Odor, Fill Materials (if present), Other	PID Scan (ppm)	Samples (y/n)	Remarks
0	0						
-2	2	S1	2.9	**0.0 - 1.2** Dark Brown, Moist, Soil/fill, silt w/ fine sand, with few medium sand and trace coarse sand, loose.	0.0	NO	
-4	4						
-6	6	S2	2.7	**0.0 - 1.0** As above but wet. **1.0 - 2.2** Dark grey, wet, silty clay with some sand and trace coarse sand, firm with some broken up shale fragments, no structure. **2.2 - 2.7** As above but black with some sand.	0.0	NO	
-8	8						
-10	10	S3	2.0	**0.0 - 0.6** As S2 1.0 - 2.2 above **0.6 - 1.1** Dark grey, wet, silt with few sand, soft, with rootlets, with some black banded discolorations. **1.1 - 2.0** Grey, grey, moist, silty clay with trace sand, firm, with rootlets.	0.0	NO	
-12	12						
-14	14	S4					
-16	16						
-18	18	S5					
-20	20						

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

FIELD GEOPROBE BOREHOLE LOG

Project Name: 3773 Lake Shore Road
Project Number: 0109 - 001 - 101
Client: Harter Secrest & Emery LLP
Drilling Company: Trec Environmental
Driller: Paul Willey
Helper: NA
Rig Type: Geoprobe

BORING NUMBER: B-7
Abandonment Method: ☐ Pressure Tremie ☑ Soil Cuttings
Start Date: 10/24/2007
End Date: 10/24/2007
Logged By: TAB
Drilling Method: Directpush
Weather: Partly cloudy mid 60s, wind 5-10 SW

Elevation (fmsl)	Depth (fbgs)	Sample No.	Recovery (feet)	SAMPLE DESCRIPTION (ASTM D2488) USCS Classification: Color, Moisture Condition, Primary Soil Type, Secondary Soil Type (<5% Trace, 5-10% Few, 15-25% Little, 30-45% Some), Structure (varved, stratified, thinly bedded, bedded, thickly bedded, laminated, fissured, blocky, lensed, massive), Consistency/Density (Standard Penetration Test, SPT), Weathering/Fracturing, Odor, Fill Materials (if present), Other	PID Scan (ppm)	Samples (y/n)	Remarks
0	0						
-2	2	S1	2.2	**0.0 - 2.2** Dark brown and grey, moist, soil/fill, silty clay with some sand, stiff with brick fragments and concrete	0.0	NO	
-4	4						
-6	6	S2	2.5	**0.0 - 1.0** Dark grey, moist, soil/fill, silty clay with some sand with pieces of shale, stiff. **1.0 - 2.5** As above but brown with trace sand and pieces of slag, with organic materials.	0.0	NO	
-8	8						
-10	10	S3	3.5	**0.0 - 0.5** As S2 0.0 - 1.0 **0..5 - 2.2** Dark grey, moist, soil/fill, clay with some silt and sand, lense of black coarse grain sand, with slight solvent odor. **2.2 - 3.5** Dark grey, moist, silty clay with trace sand and coarse and medium sand, soft to very stiff	2.8	NO	
-12	12						
-14	14	S4					
-16	16						
-18	18	S5					
-20	20						

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

FIELD GEOPROBE BOREHOLE LOG

Project Name: 3773 Lake Shore Road
Project Number: 0109 - 001 - 101
Client: Harter Secrest & Emery LLP
Drilling Company: Trec Environmental
Driller: Paul Willey
Helper: NA
Rig Type: Geoprobe

BORING NUMBER: B-8
Abandonment Method: ☐ Pressure Tremie ☑ Soil Cuttings
Start Date: 10/24/2007
End Date: 10/24/2007
Logged By: TAB
Drilling Method: Directpush
Weather: Partly cloudy mid 60s, wind 5-10 SW

Elevation (fmsl)	Depth (fbgs)	Sample No.	Recovery (feet)	SAMPLE DESCRIPTION (ASTM D2488) USCS Classification: Color, Moisture Condition, Primary Soil Type, Secondary Soil Type (<5% Trace, 5-10% Few, 15-25% Little, 30-45% Some), Structure (varved, stratified, thinly bedded, bedded, thickly bedded, laminated, fissured, blocky, lensed, massive), Consistency/Density (Standard Penetration Test, SPT), Weathering/Fracturing, Odor, Fill Materials (if present), Other	PID Scan (ppm)	Samples (y/n)	Remarks
0	0						
-2	2	S1	2.5	**0.0 - 2.5** Dark brown to black to grey, moist grey t bottom is wet, soil/fill, silt with some sand, loose, with yellow brick fragments and concrete and slag.	0.0	NO	
-4	4						
-6	6	S2	3.6	**0.0 - 0.8** As above. **0.8 - 2.0** Dark grey, moist, soil/fill, clay with some silt and trace fine and coarse sand, stiff. **2.0 - 2.5** Dark grey wet fine sand, rapid dilatency. **2.5 - 3.5** Dark grey, moist, sity clay with trace fine sand, very stiff.	0.0	NO	
-8	8						
-10	10	S3					
-12	12						
-14	14	S4					
-16	16						
-18	18	S5					
-20	20						

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

FIELD GEOPROBE BOREHOLE LOG

Project Name: 3773 Lake Shore Road
Project Number: 0109 - 001 - 101
Client: Harter Secrest & Emery LLP
Drilling Company: Trec Environmental
Driller: Paul Willey
Helper: NA
Rig Type: Geoprobe

BORING NUMBER: B-9
Abandonment Method: ☐ Pressure Tremie ☑ Soil Cuttings
Start Date: 10/24/2007
End Date: 10/24/2007
Logged By: TAB
Drilling Method: Directpush
Weather: Partly cloudy mid 60s, wind 5-10 SW

Elevation (fmsl)	Depth (fbgs)	Sample No.	Recovery (feet)	SAMPLE DESCRIPTION (ASTM D2488) USCS Classification: Color, Moisture Condition, Primary Soil Type, Secondary Soil Type (<5% Trace, 5-10% Few, 15-25% Little, 30-45% Some), Structure (varved, stratified, thinly bedded, bedded, thickly bedded, laminated, fissured, blocky, lensed, massive), Consistency/Density (Standard Penetration Test, SPT), Weathering/Fracturing, Odor, Fill Materials (if present), Other	PID Scan (ppm)	Samples (y/n)	Remarks
0	0						
-2	2	S1	2.7	**0.0 - 2.7** Dark brown, moist, soil/fill, clay with some silt and fine sand, with some slag pieces, stiff.	0.0	NO	
-4	4						
-6	6	S2	3.4	**0.0 - 1.0** As above. **1.0 - 3.4** Dark grey and brown, moist to wet, soil/fill, clay with some silt and fine sand, with slag and brick pieces.	0.0	NO	
-8	8						
-10	10	S3	0.9	**0.0 - 0.4** Dark brown, wet, silty clay with few sand, soft. **0.4 - 0.9** Black, wet, silt with fine sand and little coarse grained sand and some larger pieces of gravel, loose with some broken up wood fragments.	0.0	NO	
-12	12						
-14	14	S4					
-16	16						
-18	18	S5					
-20	20						

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ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

FIELD GEOPROBE BOREHOLE LOG

Project Name: 3773 Lake Shore Road
Project Number: 0109 - 001 - 101
Client: Harter Secrest & Emery LLP
Drilling Company: Trec Environmental
Driller: Paul Willey
Helper: NA
Rig Type: Geoprobe

BORING NUMBER: B-10
Abandonment Method: ☐ Pressure Tremie ☑ Soil Cuttings
Start Date: 10/24/2007
End Date: 10/24/2007
Logged By: TAB
Drilling Method: Directpush
Weather: Partly cloudy mid 60s, wind 5-10 SW

Elevation (fmsl)	Depth (fbgs)	Sample No.	Recovery (feet)	SAMPLE DESCRIPTION (ASTM D2488) USCS Classification: Color, Moisture Condition, Primary Soil Type, Secondary Soil Type (<5% Trace, 5-10% Few, 15-25% Little, 30-45% Some), Structure (varved, stratified, thinly bedded, bedded, thickly bedded, laminated, fissured, blocky, lensed, massive), Consistency/Density (Standard Penetration Test, SPT), Weathering/Fracturing, Odor, Fill Materials (if present), Other	PID Scan (ppm)	Samples (y/n)	Remarks
0	0						
-2	2	S1	2.6	**0.0 - 2.6** Dark brown and grey, moist, soil/fill, clay with some silt and fine sand, dense, loose when disturbed, with some slag and wood pieces.	0.0	NO	
-4	4						
-6	6	S2	3.0	**0.0 - 3.0** As above, but black with some blue pieces of slag.	0.0	NO	
-8	8						
-10	10	S3	3.4	**0.0 - 1.0** Dark grey, wet, silt with few sand, soft, with rootlets, with some black banded discolorations. **1.0 - 3.4** Grey, grey, moist, silty clay with trace sand, firm, with rootlets.	0.0	NO	
-12	12						
-14	14	S4					
-16	16						
-18	18	S5					
-20	20						

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

FIELD GEOPROBE BOREHOLE LOG

Project Name:	3773 Lake Shore Road	**BORING NUMBER:**	**B-11**
Project Number:	0109 - 001 - 101	**Abandonment Method:**	☐ Pressure Tremie ☑ Soil Cuttings
Client:	Harter Secrest & Emery LLP	**Start Date:**	10/24/2007
Drilling Company:	Trec Environmental	**End Date:**	10/24/2007
Driller:	Paul Willey	**Logged By:**	TAB
Helper:	NA	**Drilling Method:**	Directpush
Rig Type:	Geoprobe	**Weather:**	Partly cloudy mid 60s, wind 5-10 SW

Elevation (fmsl)	Depth (fbgs)	Sample No.	Recovery (feet)	SAMPLE DESCRIPTION (ASTM D2488) USCS Classification: Color, Moisture Condition, Primary Soil Type, Secondary Soil Type (<5% Trace, 5-10% Few, 15-25% Little, 30-45% Some), Structure (varved, stratified, thinly bedded, bedded, thickly bedded, laminated, fissured, blocky, lensed, massive), Consistency/Density (Standard Penetration Test, SPT), Weathering/Fracturing, Odor, Fill Materials (if present), Other	PID Scan (ppm)	Samples (y/n)	Remarks
0	0						
-2	2	S1	2.8	**0.0 - 2.8** Dark brown and grey, moist, soil/fill, clay with some silt and fine sand, dense, loose when disturbed, with some slag and wood pieces.	0.0	NO	
-4	4						
-6	6	S2	3.1	**0.0 - 3.1** Dark grey, moist, soil/fill clay with some silt and fine sand, with slag pieces and large cobble in shoe.	0.0	NO	
-8	8						
-10	10	S3	3.3	**0.0 - 1.2** As above but wet. **1.2 - 2.0** Dark grey wet fine sand, rapid dilatency. **2.0 - 3.3** Dark grey, moist, sity clay with trace fine sand, very stiff.	0.0	NO	
-12	12						
-14	14	S4					
-16	16						
-18	18	S5					
-20	20						

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

FIELD GEOPROBE BOREHOLE LOG

Project Name: 3773 Lake Shore Road
Project Number: 0109 - 001 - 101
Client: Harter Secrest & Emery LLP
Drilling Company: Trec Environmental
Driller: Paul Willey
Helper: NA
Rig Type: Geoprobe

BORING NUMBER: B-12
Abandonment Method: ☐ Pressure Tremie ☑ Soil Cuttings
Start Date: 10/24/2007
End Date: 10/24/2007
Logged By: TAB
Drilling Method: Directpush
Weather: Partly cloudy mid 60s, wind 5-10 SW

Elevation (fmsl)	Depth (fbgs)	Sample No.	Recovery (feet)	SAMPLE DESCRIPTION (ASTM D2488) USCS Classification: Color, Moisture Condition, Primary Soil Type, Secondary Soil Type (<5% Trace, 5-10% Few, 15-25% Little, 30-45% Some), Structure (varved, stratified, thinly bedded, bedded, thickly bedded, laminated, fissured, blocky, lensed, massive), Consistency/Density (Standard Penetration Test, SPT), Weathering/Fracturing, Odor, Fill Materials (if present), Other	PID Scan (ppm)	Samples (y/n)	Remarks
0	0						
-2	2	S1	2.9	**0.0 - 2.9** Dark brown and grey, moist, soil/fill, clay with some silt and fine sand, dense, loose when disturbed.	0.0	NO	
-4	4						
-6	6	S2	3.1	**0.0 - 3.1** Dark grey, moist, soil/fill clay with some silt and fine sand, with slag pieces.	0.0	NO	
-8	8						
-10	10	S3	3.7	**0.0 - 2.5** Dark grey wet fine sand, rapid dilatency. **2.5 - 3.7** Grey, grey, moist, silty clay with trace sand, firm, with rootletts.	0.0	NO	
-12	12						
-14	14	S4					
-16	16						
-18	18	S5					
-20	20						

ATTACHMENT 2

SITE PHOTOGRAPHS

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

PHOTOGRAPHIC LOG

Client Name:	Site Location:	Project No.:
Harter, Secrest & Emery	3773 Lake Shore Road	0109 - 001 - 101

Photo No.	Date
1	10/20/07

Direction Photo Taken:
Northwest

Description:
Fenced off tank excavation, located on southern corner of bulding.

Photo No.	Date
2	10/24/07

Direction Photo Taken:
North

Description:
500 gallon tank in open excavation.

Prepared By: TAB

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ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

PHOTOGRAPHIC LOG

Client Name:	Site Location:	Project No.:
Harter, Secrest & Emery	3773 Lake Shore Road	0109 - 001 - 101

Photo No.	Date
3	10/24/07

Direction Photo Taken:
West

Description:
Boring B-6.

Photo No.	Date
4	10/24/07

Direction Photo Taken:
North

Description:
Boring B-9.

Prepared By: TAB

ATTACHMENT 3

COMMUNITY AIR MONITORING PLAN

COMMUNITY AIR MONITORING PLAN

3773 LAKE SHORE ROAD SITE
BLASDELL, NEW YORK

December 2007 0109-001-100

Prepared for:

3773 Lake Shore Road, Inc.

Prepared by:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

COMMUNITY AIR MONITORING PLAN

3773 LAKE SHORE ROAD SITE

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ATTACHMENT 1 - Community Air Monitoring Documentation Forms

1.0 INTRODUCTION

This Community Air Monitoring Plan (CAMP) presents requirements for real-time community air monitoring and responses during soil/fill excavation at the 3773 Lake Shore Road Site in Blasdell, New York. This plan is consistent with the requirements for community air monitoring at remediation sites as established by the New York State Department of Health (NYSDOH) and the New York State Department of Environmental Conservation (NYSDEC). Accordingly, it follows procedures and practices outlined under the NYSDOH's generic Community Air Monitoring Plan dated December 25, 2002 and NYSDEC Technical Assistance and Guidance Memorandum (TAGM) 4031: Fugitive Dust Suppression and Particulate Monitoring Program at Inactive Hazardous Waste Sites.

This CAMP requires real-time monitoring for organic vapors and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain remediation activities are in progress at the Site. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The community, as referenced in this document, includes off-site residences, public buildings and grounds, and commercial or industrial establishments adjacent to the site. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, this CAMP helps to confirm that work activities did not spread contamination off-site through the air.

2.0 MONITORING AND MITIGATION REQUIREMENTS

Real-time air monitoring for organic vapors and/or particulate levels at the perimeter of the work area will be necessary. Continuous monitoring will be required for all ground intrusive activities. Ground intrusive activities include, but are not limited to, soil/fill excavation and handling, and trenching activities.

2.1 Organic Vapors

Organic vapors will be monitored at the downwind perimeter of the immediate work areas on a continuous basis. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate.

The equipment will be capable of calculating and logging 15-minute running average concentrations, which will be compared to the various action levels referenced in this section.

2.1.1 Vapor Emission Response Plan

If the ambient air concentration of total organic vapors at the downwind perimeter of the work area exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

If total organic vapor levels at the downwind perimeter of the work area persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less, (but in no

case less than 20 feet) is below 5 ppm over background for the 15-minute average.

If the organic vapor level is above 25 ppm at the perimeter of the site, the Site Safety and Health Officer must be notified and work activities shut down. The Site Safety and Health Officer will determine when re-entry of the work zone is possible and will implement downwind air monitoring to ensure vapor emissions do not impact the nearest off-site residential or commercial structure at levels exceeding those specified under the Major Vapor Emission Monitoring program described below. All 15-minute readings must be recorded and be available for NYSDEC and NYSDOH personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

2.1.2 Major Vapor Emission Monitoring

If the organic vapor level is greater than 5 ppm over background 200 feet downwind from the Site or half the distance to the nearest off-site receptor (residential or commercial structure), whichever is less, all work activities must be halted. If, following the cessation of the work activities or as the result of an emergency, organic levels persist above 5 ppm above background 200 feet downwind or half the distance to the nearest off-site residential or commercial structure from the site perimeter, then the air quality must be monitored within 20 feet of the perimeter of the nearest off-site receptor (20-foot zone).

If efforts to abate the emission source are unsuccessful and if organic vapor levels approach or exceed 5 ppm above background within the 20-foot zone for more than 30 minutes, or are sustained at levels greater than 10 ppm above background for longer than one minute, then the Major Vapor Emission Response Plan will automatically be placed into effect.

2.1.3 Major Vapor Emission Response Plan

Upon activation of Major Vapor Emission Response Plan, the following activities will be undertaken:

1. All Emergency Response Contacts as listed below and in the Site-Specific Health and Safety Plan will be contacted.

2. The local police authorities will immediately be contacted by the Site Safety and Health Officer and advised of the situation.

3. Frequent air monitoring will be conducted at 30-minute intervals within the 20-foot zone. If two successive readings below action levels are measured, air monitoring may be halted or modified by the Site Safety and Health Officer.

4. The Site Safety and Health Officer will determine if site workers can safely undertake source abatement measures. Abatement measures may include covering the source area with clean fill or plastic sheeting, or consolidating contaminated materials to minimize surface area. The Site Safety and Health Officer will adjust worker personal protective equipment as necessary to protect workers from over-exposure to organic vapors.

The following personnel are to be notified by the Site Safety and Health Officer in the listed sequence if the Major Vapor Emission Response Plan is activated:

Contact	Phone
Police/Fire Department	911
New York State Dept. of Health	(716) 847-4502
New York State Dept. of Environmental Conservation	(716) 851-7220
State Emergency Response Hotline	(800) 457-7362

In addition, the Site Safety and Health Officer will provide these authorities with a description of the apparent source of the contamination and abatement measures being taken by the contractor, if any.

2.2 Airborne Particulates

Fugitive dust suppression and airborne particulate monitoring shall be performed during any voluntary cleanup and redevelopment activities involving disturbance or handling of site soil/fill. Fugitive dust suppression techniques will include the following minimum measures:

- During soil/fill excavation and loading activities, water will be sprayed as needed to control dust migration from the handling, placement, and compaction of backfill soils.

- Excavated materials will be loaded into dump trailers located near the excavation area. The excavation equipment will have sufficient boom length to allow for placement of soils into the truck bed. Side dumping (i.e., with a front-end loader) will only be permitted if fugitive dust can be consistently controlled within the Community Air Monitoring Plan action limits.

- If disposal transport truck scheduling necessitates stockpiling of excavated soils, the stockpiles will be covered with plastic tarp and ballast during non-working hours.

- All fill materials leaving the site will be hauled in properly covered containers or haul trailers.

Additional dust suppression efforts may be required as discussed below.

2.2.1 Particulate Monitoring

Particulate concentrations should be monitored continuously at the downwind perimeter of the work zone at a minimum of one temporary particulate monitoring station. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions. The particulate monitoring will be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10), and capable of integrating and logging over a period of 15 minutes (or less) for comparison to the airborne particulate action level. In addition, fugitive dust migration should be visually assessed during all work activities.

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter ($\mu g/m^3$) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 $\mu g/m^3$ above the upwind level and provided that no visible dust is migrating from the work area.

- If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 $\mu g/m^3$ above the upwind level, work must be stopped and

a re-evaluation of activities initiated. Work can resume provided that dust suppression measures, such as those described in Section 2.2.3, are employed and are successful in reducing the downwind PM-10 particulate concentration to within 150 $\mu g/m^3$ of the upwind level and preventing visible dust migration.

2.2.2 Visual Assessment

In conjunction with the real-time monitoring program, the contractor will be responsible for visually assessing fugitive dust migration from the Site. If airborne dust is observed leaving the Site (i.e., migrating onto off-site parcels), the work will be stopped until supplemental dust suppression techniques are employed.

2.2.3 Supplemental Dust Suppression

Supplemental dust suppression techniques may include but are not necessarily limited to the following measures:

- Reducing the excavation size, number of excavations or volume of material handled.
- Restricting vehicle speeds.
- Applying water on buckets during excavation and dumping.
- Wetting equipment and excavation faces.
- Wetting hauling roads.
- Restricting work during extreme wind conditions.

Work can resume using supplemental dust suppression techniques provided that the measures are successful in reducing the downwind particulate concentration to below 150 $\mu g/m^3$ or 100 $\mu g/m^3$ above background and in preventing visible dust migration off-site.

3.0 MONITORING EQUIPMENT

3.1 Organic Vapor Monitoring Equipment

Based on past site investigation findings, the only volatile organic compound (VOC) detected in Area B (diesel-impacted soil/fill) was 1,2,4-trimethylbenzene, at an estimated concentration of 1 µg/kg. Organic odors and elevated PID readings (up to 30 ppm) were detected in several test trenches during the November 2007 investigation. No samples were collected from Area A (underground storage tank) and PID readings were below 5 ppm; however, toluene has been historically detected in soil/fill.

Organic vapor monitoring will be performed using a photoionization detector (PID) or organic vapor analyzer (OVA). The device will be calibrated and adjusted for a relative response factor suitable to the organic compounds of potential concern (see Section 4.0). Minimum equipment specifications are:

Minimum Operating Range:	0.5 ppm
Accuracy:	+/- 10%, or +/- 2 ppm
Precision:	1% of calibration to 100 ppm
Response Time:	Less than 3 seconds to 90%
UV Lamp (PID):	10.6 eV
Battery Rating:	8-hour continuous operation
Operating Conditions:	
Temperature:	0-40°C
Humidity:	0-99% relative humidity

In addition, the device will be fitted with a microprocessor capable of calculating 15-minute moving average concentrations based on no less than one-minute average samples. An adjustable audible alarm will be provided to indicate exceedance of the action levels prescribed in Section 2.1.

3.2 Particulate Monitoring Equipment

Particulate monitoring will be performed using real-time particulate monitors and shall monitor particulate matter less than ten microns (PM10) with the following minimum

performance standards:

Size Range:	<0.1 to 10 microns
Sensitivity:	1 μg/m³
Range:	0.001 to 10 mg/m³
Overall Accuracy:	+/- 10% as compared to gravimetric analysis of stearic acid or reference dust
Battery Rating:	8-hour continuous operation
Operating Conditions:	
Temperature:	0-40°C
Humidity:	0-99% relative humidity

The device will be fitted with a microprocessor capable of calculating 15-minute moving average concentrations. An adjustable audible alarm will be provided to indicate exceedance of the action levels prescribed in Section 2.2.

3.3 Weather Monitoring

A wind sock will be mounted on the field trailer or other suitable site location to check for wind direction and verify proper placement of downwind monitoring locations. Daily weather conditions will be recorded by Benchmark's Inspector. Monitoring stations will not be operated during periods of rain or wet snow.

4.0 QA/QC REQUIREMENTS

Quality Assurance/Quality Control (QA/QC) requirements for the particulate meter and organic vapor monitoring equipment include instrument calibration, training, and documentation/record keeping.

4.1 Instrument Calibration

Instrument calibration shall be performed in accordance with the manufacturer's instructions at the beginning of each workday. Following calibration and initial (upwind) measurement of background conditions, audio alarms shall be set so as to activate at the appropriate action levels based on a 15-minute moving average (i.e., short term exposure limit) concentration.

4.2 Training

All persons responsible for calibrating, handling and/or interpreting the meters or meter output data should be experienced with such work. As a minimum, the following training and experience will be required:

- 40-hour OSHA Hazwopper Training per 29 CFR 1910.120(e)(3) and 1910.120(e)(8).
- 8 hour supervisory training, in compliance with 29 CFR 1910.120(e)(4).
- Site-specific training, as required by the Site Health and Safety Plan.
- A minimum 40-hours field experience in the operation of same or similar equipment.

The Site Safety and Health Officer will designate the person(s) responsible for performing air-monitoring work. Construction activities involving disruption or handling of site fill soils will not be performed unless a qualified individual is available on site to perform the community air monitoring specified in this document.

4.3 Documentation and Reporting

Documentation of community air monitoring information will be required to provide written record of the air monitoring results and response actions taken, and to allow for verification that the program was followed in accordance with this Community Air Monitoring Plan. Monitoring information will be recorded on forms presented in Attachment 1 or on similar loose-leaf forms to facilitate photocopying. The following documentation schedule will be followed during typical site conditions (i.e., particulate concentrations below action levels).

Item	Documentation Schedule
Instrument Calibration Results	Whenever calibration is performed (minimum once daily).
Background Monitoring Results	At beginning of work day and once every 4 hours thereafter.
Downwind Monitoring Results (15-minute moving average)	Continuous (from data logger)

In the event that organic vapor levels necessitate implementation of the Major Vapor Emission Monitoring program described in Section 2.1.2, organic vapor monitoring results in the 20-foot zone will be recorded every 30 minutes.

All documentation records will be maintained in the project file for inspection by the NYSDEC and/or the NYSDOH on request. NYSDEC will be provided copies of the monitoring results recorded during remedial activities as part of the final report for the Site.

During remedial activities, NYSDEC and NYSDOH will be contacted if major vapor emissions occur as stipulated under the Major Vapor Emission Response Plan. In addition, the NYSDEC Division of Air Resources will be contacted in writing within 5 days of exceeding the 150 µg/m3 respirable dust action level. These notifications will include a description of the control measures implemented to prevent further exceedances.

ATTACHMENT 1

COMMUNITY AIR MONITORING DOCUMENTATION FORMS

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

3773 LAKE SHORE ROAD SITE
COMMUNITY AIR MONITORING DAILY LOG

Date:

LOCATION of ACTIVITIES/MONITORING STATIONS (Provide Sketch on Attached Map):

DESCRIPTION OF SITE ACTIVITIES:

WEATHER CONDITIONS:

Time of Day:	A.M.	P.M.
Ambient Air Temp.:		
Wind Direction:		
Wind Speed:		
Precipitation:		

PARTICULATE MONITORING	Location	Time	Value	Duration	Corrective Measures Taken (Eng Controls/Work Stoppage, etc.)
Exceedence of 100 ug/m3 [1]					
Exceedence of 150 ug/m3 [1]					
Visual Observation of Fugitive Dust			NA		
			NA		
			NA		

VOC MONITORING	Location	Time	Value	Duration	Corrective Measures Taken (Eng Controls/Work Stoppage, etc.)
Exceedence of 5 ppm [1]					Temporarily halt Work and continue monitoring
Reading of 5 to 25 ppm [1]					Temporarily halt Work, abate emissions with corrective actions and continue monitoring [3]
Exceedence of 25 ppm [2]					Shut Down Work Immediately and notify Site Safety & Health Officer

1. Above background for 15 minute moving average.
2. Above background at Site perimeter (indicate location on attached sketch)
3. Work may resume when total VOC conc. 200 ft downwind or half the distance to nearest receptor (whicever is less) is below 5 ppm for 15 min.

NOTE: **All exceedences are to be reported to Benchmark within 15 minutes.**

Completed By:
Checked By:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

DAILY WEATHER LOG

Date:
Project Name: 3773 Lake Shore Road Site
Project Number:
Project Location: Blasdell, NY
Client: Harter, Secrest & Emery
Benchmark Personnel:

Time	Temperature		Wind Speed Estimated (mph)	Wind Direction
	Max (°F)	Min (°F)		

Additional Comments:

BENCHMARK
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REAL TIME AIR MONITORING LOG

Date:

Project Name: 3773 Lake Shore Road Site	A.M.	P.M.
Project Number:		
Project Location: Blasdell, NY		
Client: Harter, Secrest & Emery		
Purpose of Air Monitoring: Workzone Monitoring		

Date	Personnel	Time	Air Monitoring Meter Measurement (Units)			Location/Activity/Comments
			PID (ppm)	Particulates ($\mu g/m^3$)	Other	

** Meters Used Include: Photovac 2020 s/n # - ED GK 301 / MIE Personal Data Ram s/n # - 02203

COMMUNITY AIR MONITORING PLAN:
ORGANIC VAPOR MONITORING RECORD

STATION ID: **DOWNWIND**

PROJECT: 3773 Lake Shore Road Site **DATE/ TIME:** _____

AIR MONITORING PERSONNEL: _____ **WEATHER:** _____

_____ **Temp:** _____

AIR MONITORING EQUIPMENT: MINIRAE 2000 S/N _____ **Wind:** _____

_____

DAILY INSTRUMENT CALIBRATION:

Calibration Time: _____

Type/Concentration of Calibration Gas: _____

Calibration Notes: _____

_____

PERIODIC REAL TIME VAPOR EMISSION MONITORING RESULTS:

(See additional data log sheets)

Location:	Time:	Result (ppm):	Location:	Time:	Result (ppm):

SKETCH OF WORK ZONE(S)/NOTES:

Monitoring Personnel Signature(s): _____

_____

_____

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COMMUNITY AIR MONITORING PLAN:
PARTICULATE MONITORING RECORD

STATION ID: DOWNWIND

PROJECT: 3773 Lake Shore Road Site _____ **DATE/ TIME:** _____

AIR MONITORING PERSONNEL: _____ **WEATHER:** _____

_____ **Temp:** _____

AIR MONITORING EQUIPMENT: Dataram 4000 S/N # _____

_____ **Wind:** _____

DAILY INSTRUMENT CALIBRATION:

Calibration Time: _____

Type/Concentration of Calibration: _____

Calibration Notes: _____

_____

REALTIME PERIODIC PARTICULATE MONITORING RESULTS:.

(SEE ADDITIONAL DATA LOG SHEETS)

Location:	Time:	Result ($\mu g/m^3$):	Location:	Time:	Result ($\mu g/m^3$):

SKETCH OF WORK ZONE(S):

Monitoring Personnel Signature(s): _____

_____

_____

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