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Limited Site Investigation Bengart & Memel Site 915115 1079 Clinton Street Buffalo (C), Erie Co., NY April 2006

1.0 Scope of Investigation

A limited supplemental site investigation will be performed at the former Bengart & Memel site to assess the presence of residual polychlorinated biphenyls (PCBs) in soil and groundwater at the site. In addition to the PCB assessment, additional parameters will be evaluated to assess if there are any other chemicals of concern, either residual or from subsequent operations at the site. The investigation will be limited to the site as defined as 1079 Clinton St. (100 ft by 180 ft. parcel, SBL # 112.77-4-2.1 as indicated on the attached figure).

The site was previously remediated by the respondent through treatment or removal of soil with PCB concentrations greater than 50 parts per million (ppm) and installation of a shallow groundwater collection and treatment system. Current PCB residual levels in site soil and fill are reportedly less than 50 ppm. The respondent requested to leave residual PCBs levels at the site. As result of leaving the residual PCBs in the soil, the respondent installed a groundwater collection and treatment system to address residual PCB contamination in site soils.

Currently, the shallow ground water treatment system is not functional, and has not been in operation for a number of years. The collection and treatment system requires major repair/replacement to be operational. Because the groundwater collection and treatment system is not operational, it is uncertain if residual PCBs at the site are currently being released to the environment. The investigation data will be used to assess residual PCB levels in the soil and groundwater, and the need for continued operation and maintenance of the shallow groundwater treatment system or development and implementation of a more comprehensive site remediation so as to eliminate the need for the groundwater collection and treatment system.

2.0 Scope of Work

2.1 Subsurface Soil Investigation

To assess residual PCBs in the site soils as well as other Target Compound List (TCL) compounds and hazardous characteristics, approximately 13 to 15 soil borings will be advanced

using direct push boring equipment (Geoprobe) to obtain soil samples of fill and native soils (approximately 4 to 8 feet). The boreholes will be spaced to provide representative coverage across the parcel. Soil cores will be retrieved and examined by NYSDEC employee(s). Visual and/or olfactory evidence of contamination will also be screened and recorded. Soil sampling and logging will be performed in accordance with NYSDEC investigation Standard Operating Procedures (SOPs). Soil samples will be collected at discrete zones (fill and native soils at one and 2 foot depths) so as to characterize contaminant levels in these zones.

To assess PCB contamination in and below the dilapidated structure on the parcel that was historically used for drum storage containing PCB contaminated fluids, additional sampling inside and below the structure will be collected. Swipe samples of the flooring will be collected to assess PCB contamination in the building slab. Swipe sampling will be performed in accordance with the protocols established for the GE Urban St. Site. One to two boring will be advanced through the concrete building slab to collect soil samples below the building slab.

2.2 Groundwater Evaluation

To assess groundwater residual levels at the site, approximately 3 to 5 of the borings will be converted to one-inch wellpoints. Following the installation of the wellpoints, the wellpoints will be developed using appropriate methods. The wellpoint installation and well development will be performed in accordance with NYSDEC SOPs.

2.3 Analytical Program

Fill and soil samples from each borehole will be collected for analysis of TCL PCBs only (EPA Method 8082). Soil samples will also be composited from every 4 to 5 borings and analyzed for the following:

- TCL volatile organic compounds (VOCs) (EPA Method 8260),
- TCL Semi-volatile organic compounds (SVOCs) (EPA Method 8270),
- Total RCRA metals (EPA 6000/7000 Method Series),
- Toxic Characteristic Leaching Procedure (TCLP) metals (EPA Method 1311 and 6000/7000 Method Series),
- Corrosivity (EPA Method 9045), and
- Flashpoint (EPA Method 1010).

Soil samples collected for chemical analysis will be collected in accordance with NYSDEC SOPs.

Borehole cuttings will be used for sampling. Surplus soils will be returned to the boreholes. Because of the limited amount of soil cuttings that will be obtained, nominal surplus soils are anticipated. If the return of surplus soils back into the boreholes becomes problematic, the soils will be placed into new five gallon buckets with lids, and appropriately labeled. The buckets will be placed in the onsite building for subsequent appropriate disposition

Groundwater samples from developed wellpoints will collected and analyzed TCL VOCs (EPA Method 8260), TCL SVOCs (EPA Method 8270), TCL Metals (EPA Method 6000/7000 series) and TCL PCB's (EPA Method 8082) on filtered and unfiltered samples.

Purgewater from well development and sampling will also be placed in 5 gallon buckets with lids. The buckets will be placed in the onsite building for subsequent appropriate disposition.

2.4 Surficial Investigation

Surficial soil and water samples will be collected to assess the presence of PCBs in surface soils near the perimeter of the site along Clinton Street and adjoining property to the west, and PCB levels in the groundwater collection system sump. Additional samples will be collected, if possible, from existing groundwater treatment system process vessels [influent tank, carbon vessels (quantity of 2), and effluent tank] for PCB analysis, and TCL SVOCs.

2.5 Reporting

Upon completion of the sampling and analysis program, a written summary of the investigation results and findings will be prepared. The results will be used to assess residual contamination levels in site soils and groundwater, and the need for additional action at the site.

2.6 Remedial Evaluation

Following the evaluation of collected site data, the information will be used to evaluate several remediation options including:

- the need for continued groundwater collection and treatment, and
- a more comprehensive remediation that would eliminate the need for groundwater collection and treatment (i.e. removal of residuals, demolition of the existing building, and minimal site restoration).

The remedial evaluations will include feasibility assessment and costs associated with the above remedial options. The results will be used to assess remediation funding and contracting options. If a more comprehensive remediation to address residual contaminant levels occurs at the site , a subsequent reclassification of the site may be required.

