

January 24, 2023
Refer to OP-4518

Ms. Megan Kuczka
New York State Department of Environmental Conservation, Region 9
700 Delaware Ave
Buffalo, New York 14209

Subject: Former Roundhouse Area Investigation Workplan (updated)
Union Road Site, Erie County, Cheektowaga, NY
Inactive Hazardous Waste Disposal Site No. 915128

Dear Ms. Kuczka:

Pursuant to your correspondence of October 31, 2022, Unicorn Management Consultants, LLC (UMC) on behalf of American Premier Underwriters, Inc. (APU), is providing you with the requested Former Roundhouse Area Investigation Workplan for your review and approval. This workplan was prepared in order to address the two concerns you cited regarding the Former Roundhouse Area; the condition of the soil cover and the presence or absence of soil within the former Roundhouse itself.

An annual inspection of the Restored Roundhouse Area's cover system will be performed and included in a revised Operation and Maintenance (O&M) plan for the site. Prior to updating the O&M plan, an inspection of the existing cover system will be performed in order to ensure that a minimum cover of six (6) inches of soil is present. UMC will plan to conduct this inspection after the 2023 winter season has concluded, during the second quarter of 2023. The inspection plan will consist of up to ten (10) representative locations within the Restored Roundhouse Area for inspection. These proposed locations are shown on **Figure 1** (attached). The depth of soil cover will be confirmed by hand digging at each location. The soil depth at each location will be measured and photo-documented. Note that the proposed locations indicated on **Figure 1** are approximate, and may need to be relocated depending on access issues and/or extent of vegetative cover that is present. Soil that is removed during the hand digging activities will be placed back into the excavation once the inspection has been conducted. During the inspection, deficiencies in the cover system such as distressed vegetation, erosion, sloughing and other disturbances will be noted, and reported to the NYSDEC. If necessary, subsequent restoration of vegetation and /or augmentation of soil cover will be conducted.

An investigation of the former Roundhouse itself (see **Figure 1**) will also be conducted in order to determine if the remaining soils in this area are below the NYSDEC's soil cleanup objectives. Soils that are present between each of the concrete spokes of the former Roundhouse will be specifically targeted as part of this investigation. The extent of the concrete structure in the middle of the former roundhouse will be investigated and documented and if soil is present samples will be collected and analyzed for the same compounds as those from the soil cover. The specific locations for sampling will be determined during the second quarter of 2023, in parallel with the soil cover inspection of the Restored Roundhouse Area, described above. Sampling activities will be conducted during the third quarter of 2023. Soil samples from each location will be collected and shipped under appropriate laboratory protocols to ALS Environmental Laboratories in Rochester, NY (ALS) for the analysis of the following:

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- Volatile Organic Compounds (VOCs) via method 8260;
- Semi-Volatile Organic Compounds (SVOCs) via method 8270;
- PCBs via method 8082;
- Pesticides via method 8081;
- Herbicides via method 8151; and
- Metals via methods 6010/7471

To ensure data quality, for every 20 environmental samples collected, one duplicate sample and one MS/MSD sample will be collected and submitted to the laboratory for analysis. A trip blank will also be included for VOCs to ensure that cross contamination during shipment to the laboratory is not a concern. The samples will be sent to a third-party data validator. To prevent cross contamination during sampling, the sampling equipment will be decontaminated prior to and between each sample by washing the samplers in water and scrubbing with a brush followed by a rinse of water and Alconox and then a final rinse of DI water.

Following receipt of the laboratory analytical data, UMC will provide NYSDEC with a summary of the results from the proposed Roundhouse Area Investigation. The results of the quality control samples will be evaluated for data usability by a third party to demonstrate that the environmental samples are representative of site conditions.

During field sampling activities, a Community Air Monitoring Plan (CAMP) will be implemented to demonstrate protection of the nearby residents from airborne contaminants that may be produced during all excavation activities. UMC will adhere to the NYSDOH generic CAMP as outlined Appendix 1A of DER-10. Additionally, all investigative activities described herein will adhere to the current Operation and Maintenance Plan. If you have any questions regarding this proposed workplan, please call me at 203-205-9000, ext. 13.

Sincerely,

Unicorn Management Consultants, LLC

A handwritten signature in black ink, appearing to read "Michael O'Connor". The signature is fluid and cursive.

Michael J. O'Connor, LEP, P.G.
Manager of Environmental Projects
Union Road Remediation Project

Attachments

Cc: Andrea Caprio – NYSDEC
Phoebe Gittelson, Esq. – NYSDEC
Leia Schmidt, Esq. – NYSDEC
Johnathan Robinson – NYSDOH
Julia Kenney – NYSDOH
Charlotte Bethoney – NYSDOH
Francisco Trejo – Unicorn Management Consultants, LLC
M. Hill, Esq. – American Premier Underwriters, Inc.



Unicorn Management Consultants, LLC

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Project Name: Union Road

Figure 1

Author: NRH

Checked By:

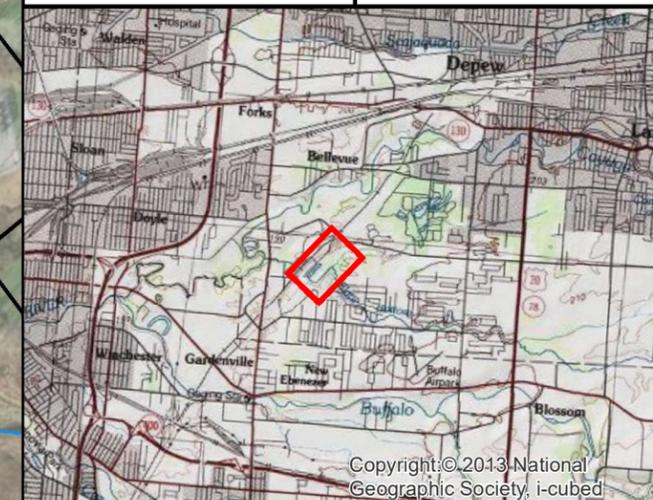
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Created: 12/20/22

Revised: 01/06/23

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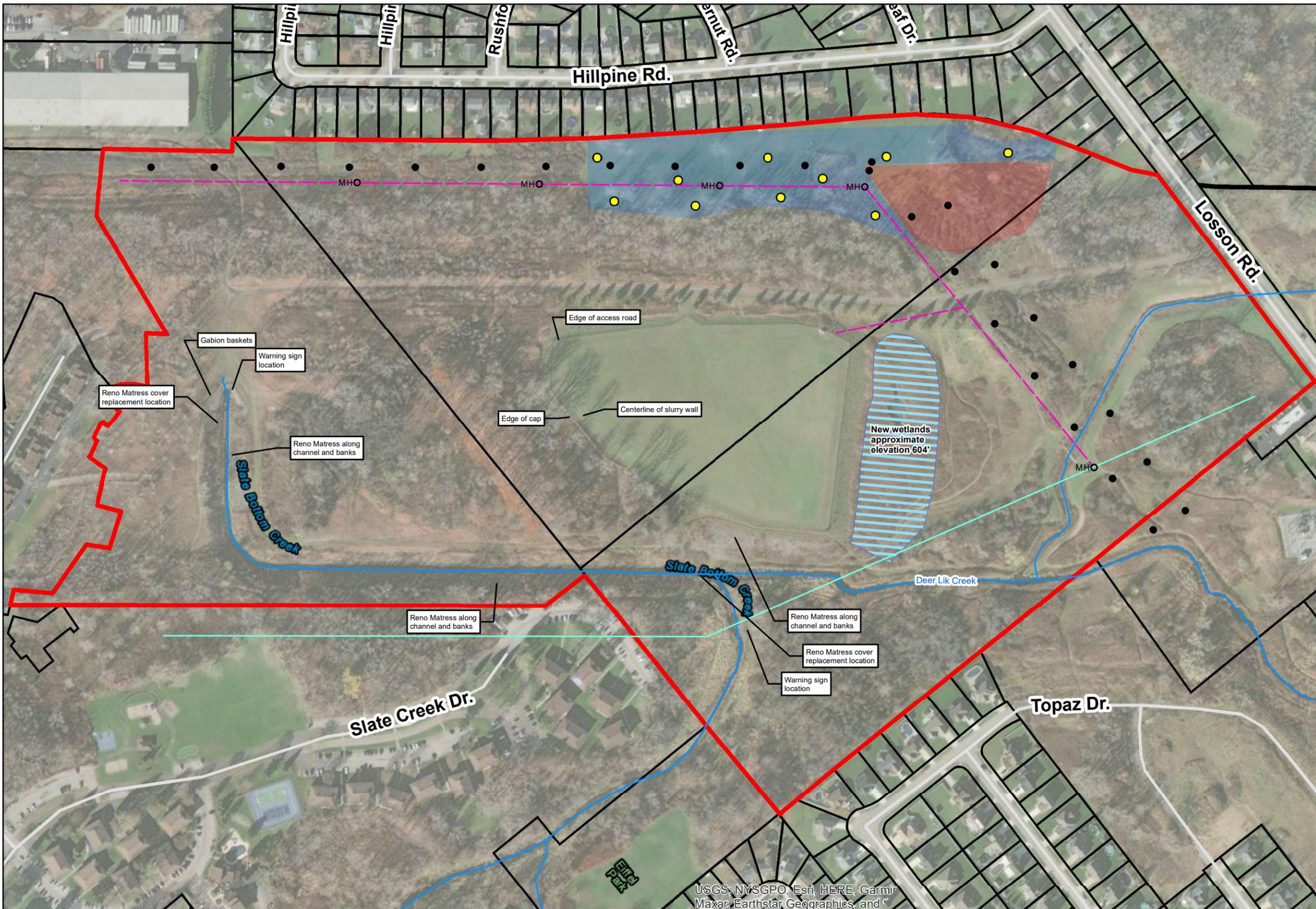
File: Roundhouse



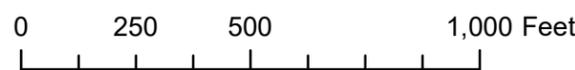
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Legend

- Proposed Soil Cover Confirmation Location
- Manhole Cover
- Utility Pole
- Water Main
- Sanitary Sewer Pipe
- Hydrography Flowline
- Road
- Former Roundhouse Area
- Restored Roundhouse Area
- Wetland
- Site Boundary (Parcels)
- Erie County NY Parcels



USGS, NYSGPO, Esri, HERE, Garmin, Maxar, Earthstar Geographics, and "



Union Road Site Town of Cheektowaga, New York



Proposed Investigation - Restored and Former Roundhouse Area