

June 6, 2025

Andrew Zwack
Assistant Engineer
New York State Department of Environmental Conservation
Division of Environmental Remediation - Region 9
700 Delaware Avenue, Buffalo, New York 14209

Re: Amherst Central Park, NYSDEC Site No.: 915291
Proposed Additional Characterization – TCLP and Sediment Samples

Dear Andrew:

C&S Engineers, Inc. (C&S) is currently working with the Town of Amherst to conduct site characterization activities at the former Westwood Country Golf Course, now identified as Amherst Central Park (the Site). As you know, the Site is the subject of a P-Order. In 2024, C&S performed characterization activities in the southern portion of the Site in accordance with the December 2023 Construction Characterization Work Plan (CCWP), which was approved by the New York State Department of Environmental Conservation (NYSDEC).

Additional sampling is required to better characterize the Site. A previously sampled drainage swale contained a concentration of mercury slightly above the Commercial Use Soil Cleanup Objective. Based on the swale's proximity to the creek, sediment samples will be collected to assess potential impacts to the creek. Additionally, to provide additional information for the planning of interim remedial measures, the greens in which the highest metals concentrations were detected will be sampled for toxicity characteristics.

We propose to conduct additional sampling at the Site in accordance with the approved CCWP as depicted on the figure attached hereto, based on the following amended approach:

- Four sediment samples will be collected and analyzed for Part 375 Metals. Samples will be collected from the following locations around Hole #17 and Hole #18:
 - Ellicott Creek north of Hole #18, where the creek enters the Site
 - Upstream of the previously sampled drainage swale
 - Downstream of the previously sampled drainage swale
 - In the swale leading into the oxbow (resampling of the original location)
- Three soil samples will be collected from 3 separate locations on each of the following greens: Hole #6, Hole #11, Hole #17 (9 total samples in all).
 - The samples will be collected from 0 to 6 inches below grade.
 - Each sample will be analyzed for:

- Total arsenic, cadmium, and mercury
- Toxicity characteristic leaching procedure (TCLP) arsenic, cadmium, and mercury
- The laboratory results will be submitted to a third-party validator for the preparation of a Data Usability Summary Report (DUSR).
- C&S will submit the findings in a report that summarizes the results as well as previous findings.

We are prepared to initiate the sampling program within three days of receipt of NYSDEC approval.

Sincerely,

C&S ENGINEERS, INC.



Daniel E. Riker, P.G.
Environmental Service Group Manager

Cc: C. Staniszewski, NYSDEC
S. Radon, NYSDEC
G. Scholand, NYSDEC
D. Simmons, Hancock Estabrook, LLP
R. Stanton, Erie County



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroX, Geomatics, AeroGRID, IGN, IGA, Swisstopo, and the GIS User Community



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-  - Proposed 0-6" Soil Sampling Locations
-  - Proposed Sediment Sample Locations

Amherst Central Park Proposed Soil and Sediment Sampling Locations