

King, Matthew A (DEC)

From: King, Matthew A (DEC)
Sent: Wednesday, November 10, 2021 4:00 PM
To: Cummings, Michael
Cc: Frappa, Rick; Katie Hoelscher; 'AlexanderT@natfuel.com'; khogan; Moeller, Steven M (DEC); Vaccaro, Joshua M (DEC); May, Glenn (DEC)
Subject: RE: P-Site Work Plan revisions

Hi Mike,

The Department accepts the work plan revision as outlined in your November 10th letter.

Thanks,

Matt

Matthew King

Assistant Geologist, Division of Environmental Remediation

New York State Department of Environmental Conservation

270 Michigan Ave., Buffalo, NY 14203

P: 716-851-7258 | matthew.king@dec.ny.gov |

From: Cummings, Michael <mcummings@geiconsultants.com>
Sent: Wednesday, November 10, 2021 6:15 AM
To: King, Matthew A (DEC) <Matthew.King@dec.ny.gov>
Cc: Frappa, Rick <rfrappa@geiconsultants.com>; Katie Hoelscher <HoelscherK@natfuel.com>; 'AlexanderT@natfuel.com' <AlexanderT@natfuel.com>; khogan <khogan@phillipslytle.com>
Subject: RE: P-Site Work Plan revisions

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Hi Matt,

Attached please find a letter detailing the need to relocate or eliminate proposed investigation locations on the P-Site due to the alignment of the Buffalo Sewer Authority Interceptor Drain. The proposed new locations will be finalized in the field following DigSafe clearances.

Please let me know if you have any questions.

Thank you,
Mike

GEI MICHAEL A. CUMMINGS, P.G.
Hydrogeologist
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100 Sylvan Parkway, Suite 400, Amherst, NY 14228



November 10, 2021

Geotechnical
Environmental
Water Resources
Ecological

Mr. Matthew King
Assistant Geologist
New York State Department of Environmental Conservation
Division of Environmental Remediation
270 Michigan Avenue
Buffalo, New York 14203

**Subject: Site Characterization Work Plan – Sediment Sampling and Soil Boring/
Monitoring Well Location Revisions
Former Buffalo Gaslight Iroquois Gas Corp. Site
Buffalo, New York (NYSDEC Site #915351)**

Dear Mr. King:

On behalf of National Fuel Gas Distribution Corporation (National Fuel Gas), GEI Consultants, Inc. P.C. (GEI) is proposing to relocate one sediment boring within Scajaquada Creek and one terrestrial-based monitoring well location, as well as omit one terrestrial-based monitoring well location as part of the P-Site Site Investigation (NYSDEC Site #915351, P-Site). Based on the recent identification of buried utility infrastructure transecting the P-Site present at depths which may potentially be intersected by several Site Characterization investigation locations proposed in the original Site Characterization Work Plan (Work Plan, submitted to NYSDEC on August 18, 2021, and approved by NYSDEC in a letter dated October 5, 2021).

During a field meeting with Buffalo Sewer Authority (BSA) on November 5, 2021, a representative from BSA identified the location of the BSA Interceptor Sanitary Sewer (approximately 9-feet in diameter), which in the subsurface, predominantly occupies the area between the I-190 northbound lane and the entrance ramp to the I-190 outbound entrance ramp from I-198 (shown in blue on the attached Figure 1). Based on this information, the omission of proposed monitoring well location MW-BGL-2, the relocation of MW-BGL-1, and also the relocation of Scajaquada Creek sediment sample location SED-BGL-1 are necessary to substantially eliminate the potential of drilling into this critical infrastructure at depth.

Based on previously identified subsurface utilities on the P-Site conducted as part of the Dig Safely New York one-call system, GEI is proposing a new location for soil boring/monitoring well MW-BGL-1 and a new location for sediment sampling location SED-BGL-1 (both are presented on attached Figure 1.) The revised location for each original boring will avoid identified utilities to-date. Dig Safely New York one-call was initiated on November 5, 2021 and based on the 72 hour notice requirement, GEI and its drilling subcontractor will be prepared to initiate drilling (pending NYSDEC approval) on November 11, 2021. An

alternative location for MW-BGL-1 was tentatively identified during field discussions with NYSDEC near the mouth of Scajaquada Creek (location MW-BGL-1 alternate), however, field discussions with BSA have indicated that boring activities in this location as having the potential to intersect relic BSA sewer infrastructure. Therefore, GEI is proposing a single alternative boring location for MW-BGL-1 (MW-BGL-1 final) as shown on Figure 1.


GEI and National Fuel Gas anticipate that the relocation of the proposed investigation locations will continue to satisfy the goals of the Department-approved P-Site Work Plan and we look forward to the Department's approval of these proposed relocations.

Please contact the undersigned at (716) 572-4362 if you have any questions.

GEI CONSULTANTS, INC., P.C.



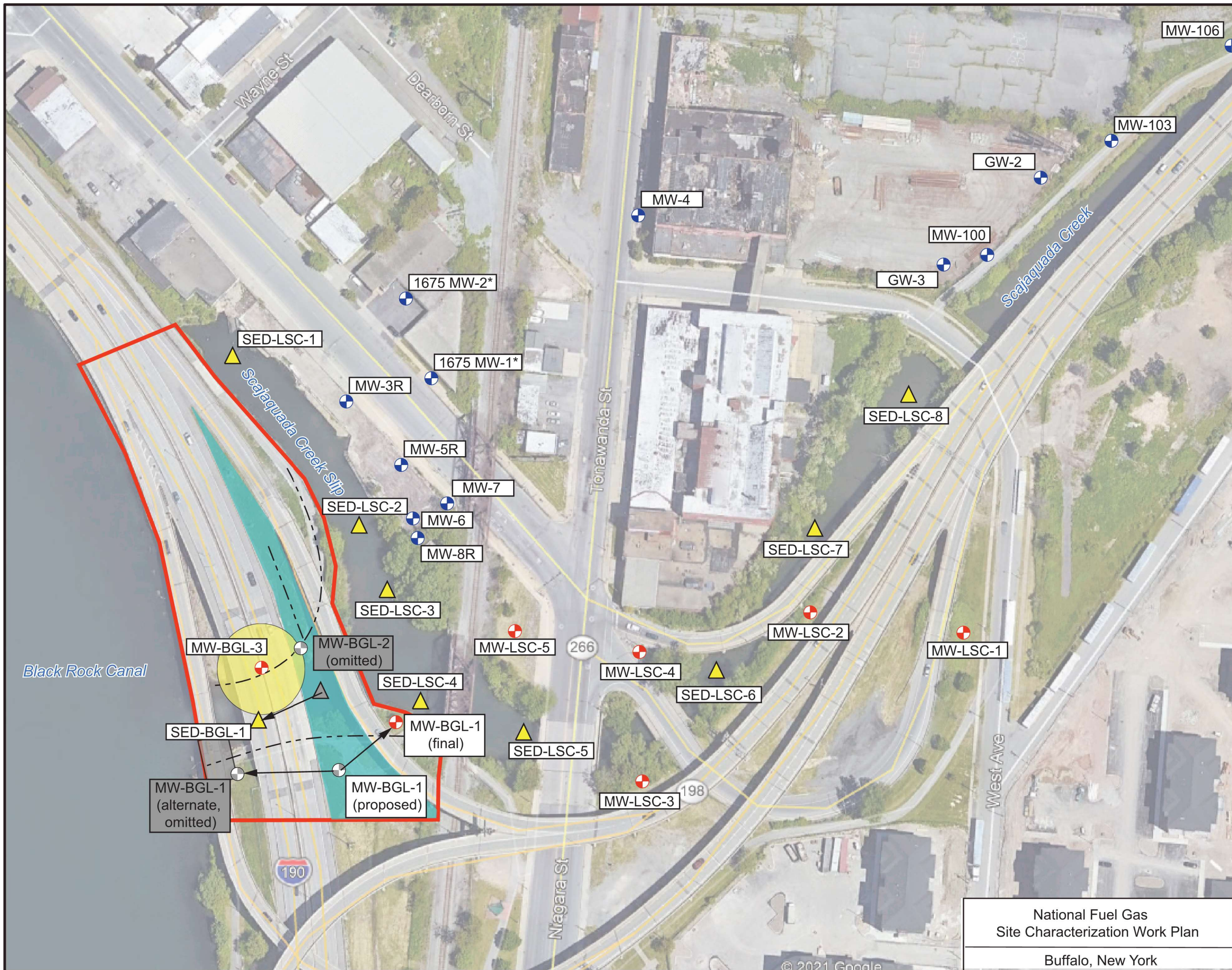
Richard H. Frappa, P.G.
Senior Professional/Hydrogeologist



Michael Cummings, P.G.
Project Hydrogeologist

cc: Tanya Alexander - National Fuel
Katie Hoelscher - National Fuel
Kevin Hogan – Phillips Lytle

Attachment: Figure 1- Proposed Site Characterization Sampling Locations



EXPLANATION

- EXISTING MONITORING WELL LOCATION
- PROPOSED SOIL BORING/ MONITORING WELL LOCATION
- PROPOSED SEDIMENT BORING LOCATION
- PROPOSED GEOPHYSICAL TRANSECT LOCATION
(Transects are below elevated portions of highway and access ramps.)
- P-SITE BOUNDARY
- FORMER GAS HOLDER LOCATION (approximate, based on 1916 Sanborn Map.)
- FORMER STRUCTURE (approximate, based on 1916 Sanborn Map.)
- No-dig zone; 9' diameter Buffalo Sewer Authority Interceptor Infrastructure Area
- Grayed locations indicate relocation or omission of existing proposed boring, with arrow showing proposed new location where not omitted.



SCALE, ft. (approximate)

National Fuel Gas
Site Characterization Work Plan

Buffalo, New York



Proposed Site
Characterization
Sampling Locations

November 2021 Figure 1