March 16, 2020

Mr. Benjamin McPherson, P.E.
Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 9
270 Michigan Avenue
Buffalo, New York 14203-2999

Re: SMP Revision 1: Operation of SVE System 2-SVE-1
Olean Redevelopment Parcel 2 (Site No. C905032)

Dear Mr. McPherson:

Benchmark Environmental Engineering & Science, PLLC in association with TurnKey Environmental Restoration, LLC (Benchmark-TurnKey) have operated, maintained and monitored the soil vapor extraction (SVE) system on the Olean Redevelopment Parcel 2 in Olean, New York (BCP Site No. C905032) since its installation in late 2014 in accordance with the New York State Department of Environmental Conservation (NYSDEC)-approved Site Management Plan (SMP)[1]. The current Site owner, Solean West, LLC, is responsible for operation, maintenance and monitoring (OM&M) of SVE System 2-SVE-1.

The purpose of this letter is to propose a revision to the method of operation for SVE System 2-SVE-1 based on the favorable results of the soil verification sampling and testing completed in support of the November 18, 2019 request for discontinuation of the system. Once approved by NYSDEC, this letter will serve as an official amendment to the August 2018 SMP.

BACKGROUND

Olean Gateway, LLC (OG) executed a Brownfield Cleanup Agreement (BCA) with NYSDEC in October 16, 2012. The Site was remediated from 2010 to 2015 and received a certificate of completion (COC) in December 2015. Solean West purchased the Site in March 2016 and has been conducting the OM&M since that time. As part of the Site remedy, SVE System 2-SVE-1 was installed and has been operating since October 2014. OM&M of the SVE system is part of the monitoring required in the approved SMP.

[1] Benchmark Environmental Engineering & Science, PLLC. *Site Management Plan, Olean Redevelopment Parcel 2, Olean, New York, BCP Site No. C905032*. Revised August 2018.

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In its November 18, 2019 letter, Benchmark-TurnKey presented data that it believed demonstrated the SVE system had achieved the soil/fill remedial action objectives presented in Section 1.7 of the RAWP and the system shutdown criteria outlined in Section 3.3.5.2 of the SMP:

- *Reduction of volatile organic compounds (VOC) concentrations in the untreated air samples*: The soil vapor contamination has leveled off indicating the successful reduction of VOCs in the untreated subsurface air. The VOCs in untreated air samples have been reduced by 99.8% based on photoionization detector (PID) readings and an average of 99.5% based on analytical data during the 5 years of operation. Air-phase petroleum hydrocarbon (APH) concentrations have been reduced by approximately 99.7%.
- *Rate of mass removal of VOCs by the SVE system*: Contaminant concentrations have become asymptotic to a low level (0.2 lb/day on average) over an extended period (20 months).
- *Reduction of VOC concentrations in the soil/fill samples (pre- and post-treated)*: All post-treated VOC concentrations are below commercial soil cleanup objectives (CSCOs) with all constituents of concern below residential soil cleanup objectives (RSCOs).
- *Remediating grossly contaminated petroleum soil (GCPS) until nuisance characteristics (i.e., odors, visual nonaqueous phase liquid (NAPL), and elevated soil vapor concentrations) have been removed to the extent feasible:* No visual or olfactory evidence of impact were noted in the September 2019 samples. PID readings in subsurface soil/fill have been reduced through treatment by approximately 57% (2-GCPS-1d) and 87% (2-GCPS-2d); all 2019 PID readings are well below 1,000 parts per million (ppm.)

However, it is NYSDEC's opinion that the olfactory and PID impacts at verification soil sample VSS-6 and, to a lesser extent, VSS-5 require further remediation. During our conference call on March 16, NYSDEC agreed that operation of the eastern leg of the SVE system (area 2-GCPS-2d) can be discontinued provided wellhead PID measurements continue at all SVE wells.

PROPOSED REVISIONS TO SVE SYSTEM OPERATION

Benchmark-TurnKey proposes the following revisions to the SMP for operation of SVE System 2-SVE-1 effective immediately:

- Discontinue operation of the eastern leg of the SVE system, which includes SVE wells 2-SVE-8 through 2-SVE-13.
- Continue operating SVE wells 2-SVE-2 through 2-SVE-6 and shutting off wells 2-SVE-1 and 2-SVE-7 due to consistently low wellhead PID readings and to obtain higher vacuum at the operating wells.
- Continue PID readings at SVE wellheads 2-SVE-1 through 2-SVE-13.
- Discontinue operation of the SVE system during the winter months (December through March) with startup once temperatures are consistently above 32°F.

Benchmark-TurnKey will monitor the overall efficacy of the western leg of the SVE system in 2020 and present the results in the 2021 Periodic Review Report (PRR). If appropriate at that time, Benchmark-TurnKey may request discontinuation of the remaining operating system.

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

Sincerely,
TurnKey Environmental Restoration, LLC

Michael A. Lesakowski
Sr. Project Manager

Lori E. Riker, P.E.
Sr. Project Manager

ec: Paul Curran (Solean West LLC)