Engineers and Scientists

June 7, 2012 File No.: 21.0056637.40

Chad Staniszewski, P.E.



535 Washington Street 11th Floor Buffalo, New York 14203 716-685-2300 FAX 716-685-3629 http://www.gza.com 270 Michigan AvenueBuffalo, New York 14203-2999Re: On-Site Soil Source for Reuse as Backfill

New York State Dept. of Environmental Conservation (NYSDEC)

On-Site Soil Source for Reuse as Backfill Former Signore Facility (C915260) Former Signore, Inc. Ellicottville, New York 14731 NYSDEC BCP Site No. C905034

Division of Environmental Remediation - Region 9

Dear Chad:

On behalf of Iskalo Ellicottville Holdings LLC (Iskalo), GZA GeoEnvironmental of New York (GZA) has prepared this sampling plan to assess soil for reuse as backfill at the Signore BCP Site. As shown on Figure 1, Iskalo would like to assess soil located outside of the Signore BCP Site footprint, but within the Signore property limits, for reuse as backfill during the upcoming soil excavation work that will remove additional impacted soils at the Signore BCP Site. It is estimated that approximately 3,200 cubic yards of soil may be needed for the upcoming soil removal and backfill project. Therefore, we are proposing to assess a 200 foot by 120 foot area to a depth of 4 feet (see Figure 1). This is approximately 3,555 cubic yards of soil.

The following section defines the scope of work for collecting soil samples from the area shown on Figure 1 to provide data that will satisfy New York State Department of Environmental Conservation (NYSDEC) Division of Remediation (DER) guidelines outlined in DER- 10^1 Table 5.4(e)10. The information gathered will help assess the soil for reuse as backfill within the Signore BCP Site. According to Table 5.4(e)10, the recommended number of soil samples for analysis to assess 3,500 cubic yards of soil is as follows.

- 13 discrete soil samples for volatile organic compounds (VOCs) analysis; and
- 5 composite soil samples for semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), metals and pesticides analysis.

¹ NYSDEC, Division of Remediation, DER-10/Technical Guidance for Site Investigation and Remediation, dated March 3, 2010.



SCOPE OF WORK

<u>Grid Layout</u>

The area proposed for use as a borrow source will need to be marked out and a grid pattern (40 feet by 40 feet) established for the sampling, prior to completing the soil probes to collect the required soil samples. We are proposing a 200-foot by 120-foot area to be assessed to a depth of 4 feet below ground surface (bgs) and will consist of 15 grid areas (see Figure 1). This is approximately 3,555 cubic yards of soil.

Soil Probes

GZA proposes to complete 15 soil probes to 4 feet bgs to collect the 13 discrete and five (5) composite soil samples to assess the soil conditions. The soil probes will be completed from the center of each grid area and field screened with an organic vapor meter (OVM). A log will be generated for each soil probe location. We estimate the soil probe activities will take one day to complete.

<u>Sample Analysis</u>

According to DER-10 Table 5.4(e)10, the sampling frequencies for approximately 3,500 cubic yards of soil would require 13 discrete VOCs samples and five (5) composite samples for semi-volatile organic compounds (SVOCs), inorganics, polychlorinated biphenyls (PCBs) and pesticides.

Figure 1 shows the grid layout with the 15 grid areas. The 13 VOC samples will be collected from soil exhibiting the highest OVM readings, if total organic vapors are detected. VOC samples will not be composited from the sample interval, but will be from specific depths from ground surface to 4 feet below ground surface. If OVM readings indicate non-detect concentrations, VOC samples will be collected from various depths to provide depth distribution amongst the sampling locations.

The 5 composite samples will be collected, one from each of the five (5) grid area rows orientated generally in the north-south direction. Therefore, soil from three (3) grid areas generally orientated in an east-west direction will be composited to make one (1) composite sample. Representative soil from each of the three (3) probes will be placed in a stainless steel bowl and mixed to generate one (1) composite sample.

REPORTING

A report will be prepared to discuss the results of the sampling. It will contain a summary of the work completed, observations, analytical data, figures and conclusions relating to the reuse of the Site soil at the Signore BCP Site.



We would appreciate an expedited turn-around on the review of this work plan, as remedial activities associated with the removal of additional impacted soil at the Signore BCP Site are tentatively being scheduled for July 2013 and we would like to conduct our sampling in advance of this work. Once approved, NYSDEC will be notified 7 days prior to the start of the soil probe activities.

If you need additional information or would like to discuss the project, please contact Chris Boron (GZA Project Manager) at (716) 844-7046.

Respectfully,

GZA GeoEnvironmental of New York

Christopher Boron Senior Project Manager

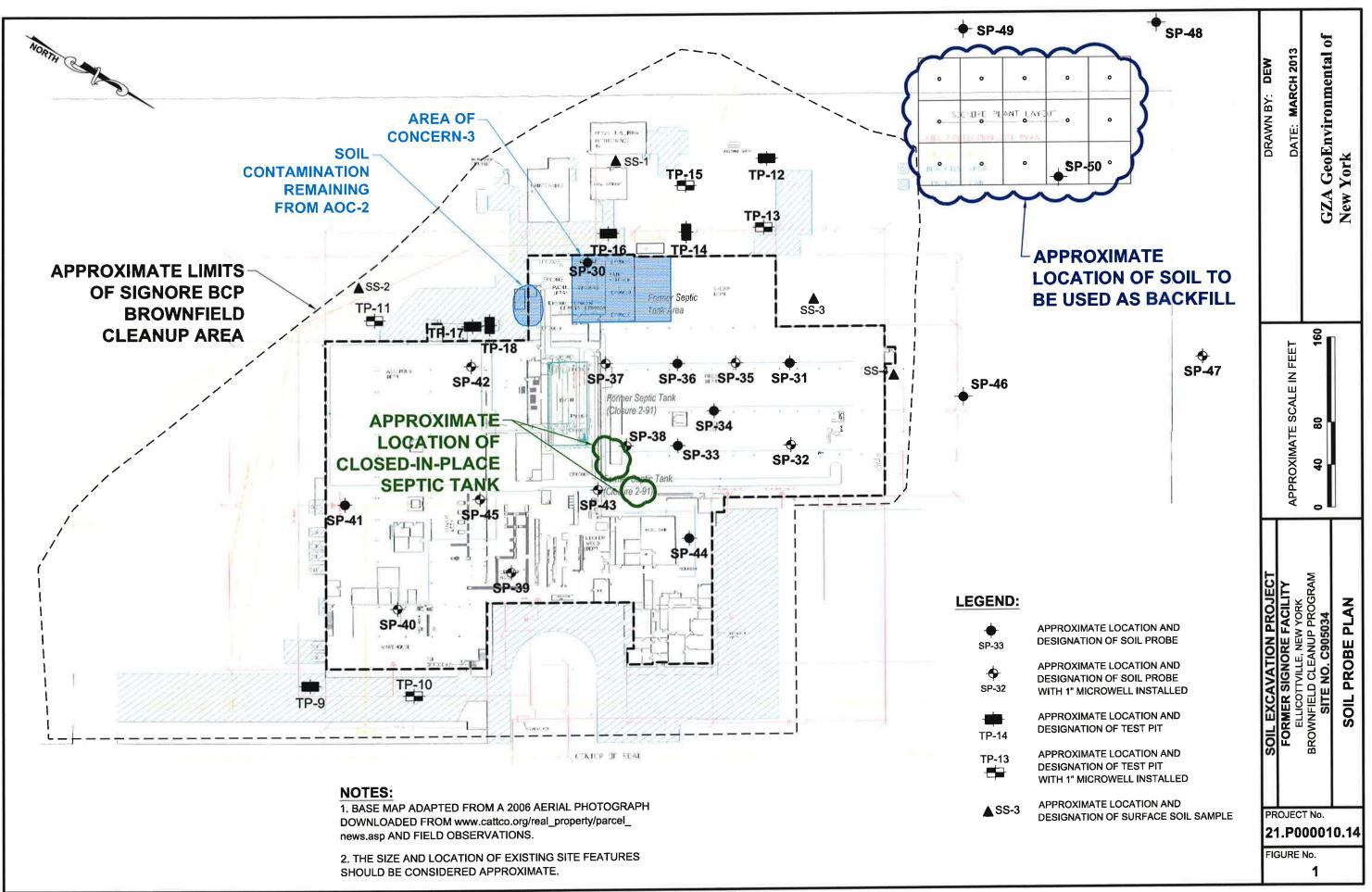
Bart A. Klettke, P. E. Associate Principal

Attachments

Figure 1

cc:

Matt Roland (Iskalo Development, electronic copy only)



C 2013 GZA GeoEnvironmental of New York