

June 5, 2026

Benjamin McPherson,
P.E. NYSDEC
700 Delaware Avenue
Buffalo, New York 14209

Re: 291 Homer Street, Site No.: C905042
Olean, Cattaraugus County
SSDS Decommissioning Plan Response

Dear Mr. McPherson:

Roux Associates, Inc. (Roux), have reviewed the March 26, 2026 comments to the submission titled SSDS Decommissioning Plan [March 2026], as provided by the New York State Department of Environmental Conservation (NYSDEC). Based on our review we have the following response to comments:

- 1) Overall: There are multiple instances where the work plan references verbal discussions between Roux and NYSDEC staff. Such discussions are considered informal guidance and do not indicate formal acceptance by NYSDEC unless followed up with written confirmation. In addition, during the referenced discussion it was stated that NYSDOH would need to review the proposals, which the statements in the work plan text do not reflect;

Noted and revised

- 2) Confirmation Sampling: while NYSDEC acknowledges the results from the previous sampling events, it was stated in the 2025 *Performance Monitoring Report* that "it is Roux's recommendation that operation of the New Paint Shop portion of the SSDS remain discontinued and the SMP be amended to reflect this change upon receipt of confirmatory analytical data during the 2026-2026 heating season SVI". It is not clear what has changed since that report was submitted to no longer include confirmatory sampling. Given the timing of the work plan submittal and our review time, such confirmatory sampling should be completed during the 2026-2027 heating season. The New Paint Shop SSDS may remain off during this time; and

Revised to include confirmatory sampling completed consistent with the previous Work Plan during the 2026-2027 heating season.

- 3) Figure 2: it is not clear what is meant by the "Areas to be excluded from the IC boundaries" feature shown on this figure. The outline of the feature appears to correspond to the New Paint Shop, but the shutdown of the SSDS in that building does not remove the institutional control (IC) from that area. The environmental easement will still be in effect for the whole site. Clarification of this is needed.

Noted, the IC Figure 2 has been removed from the revised current submission.

Mr. Benjamin McPherson
June 5, 2026
Page 2

If you have any questions on the above response to comments, please contact me at 781-569-4000 or brobinson@rouxinc.com.

Sincerely,

ROUX ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read 'BR', with a long horizontal flourish extending to the right.

Brian Robinson, PE
Senior Engineer

June 5, 2026

Benjamin McPherson,
P.E. NYSDEC
700 Delaware Avenue
Buffalo, New York 14209

Re: 291 Homer Street, Site No.: C905042
Olean, Cattaraugus County
SSDS Decommissioning Plan

Dear Mr. McPherson:

Roux Associates, Inc. (Roux), have reviewed the February 9, 2026 comments to the report titled *Periodic Monitoring Report (PMR)* [August 2025], as provided by the New York State Department of Environmental Conservation (NYSDEC). It was Roux's recommendation in the 2023-2025 PMR that the New Paint Shop (NPS) sub-slab depressurization system (SSDS) be formally shutdown and removed from the Site IC/ECs, allowing the Site to exit Corrective Measures. NYSDEC, in the above referenced PMR Comments indicated that this would be acceptable. The following is a decommissioning work plan that details the confirmation sampling to be done and how the piping will be abandoned.

Background

An active SSDS is present under several buildings on-Site including:

- New Warehouse (NW);
- New Paint Shop (NPS);
- New Office (NO);
- Existing Office (EO); and
- Building Addition (BA).

With the exception of the BA system, which is standalone, the piping for these systems are run to a central location in the NW where the main blower is located (Figure 1). Each location has a leg of SSDS piping which is fed into the NW, isolated from the system by a 4" PVC ball valve prior to all legs being manifolded together and connected to the blower.

Confirmation Sampling

Since approximately 2019 the NPS portion of the SSDS has been offline and all associated NPS SSDS piping isolated from the system blower. While off, SVI samples representative of unmitigated conditions in the NPS were collected during the 2023-2024 heating season. The results of the NPS SVI sampling were reported in the 2023- 2025 PMR. These results formed the basis of Roux's recommendation that the NPS SSDS be formally decommissioned and removed from the Site IC/ECs. Roux proposes confirmatory SVI sampling consistent with the 2023-2024 heating season SVI workplan be completed during the 2026-2027 heating season.

Decommissioning Plan

Upon receipt of NYSDEC approval (and pending confirmation via the proposed 2026-2027 heating season SVI analytical results) Roux plans to decommission the NPS SSDS by locking out the 4-inch PVC valve (Figure 1). The proposed method of decommissioning does not include cutting, capping, or grouting of the NPS SSDS piping.

Schedule

Roux plans to complete confirmatory SVI sampling on or after November 2, 2026 and decommission the NPS SSDS as described in this letter on or after November 9, 2026. The change will be memorialized in a revised Site Management Plan (SMP) to be submitted to NYSDEC within 90 days of the completed decommissioning. It is Roux's opinion that the NPS portion of the SSDS should continue to remain offline while any confirmatory sampling, decommissioning planning, or SMP revisions are pending.

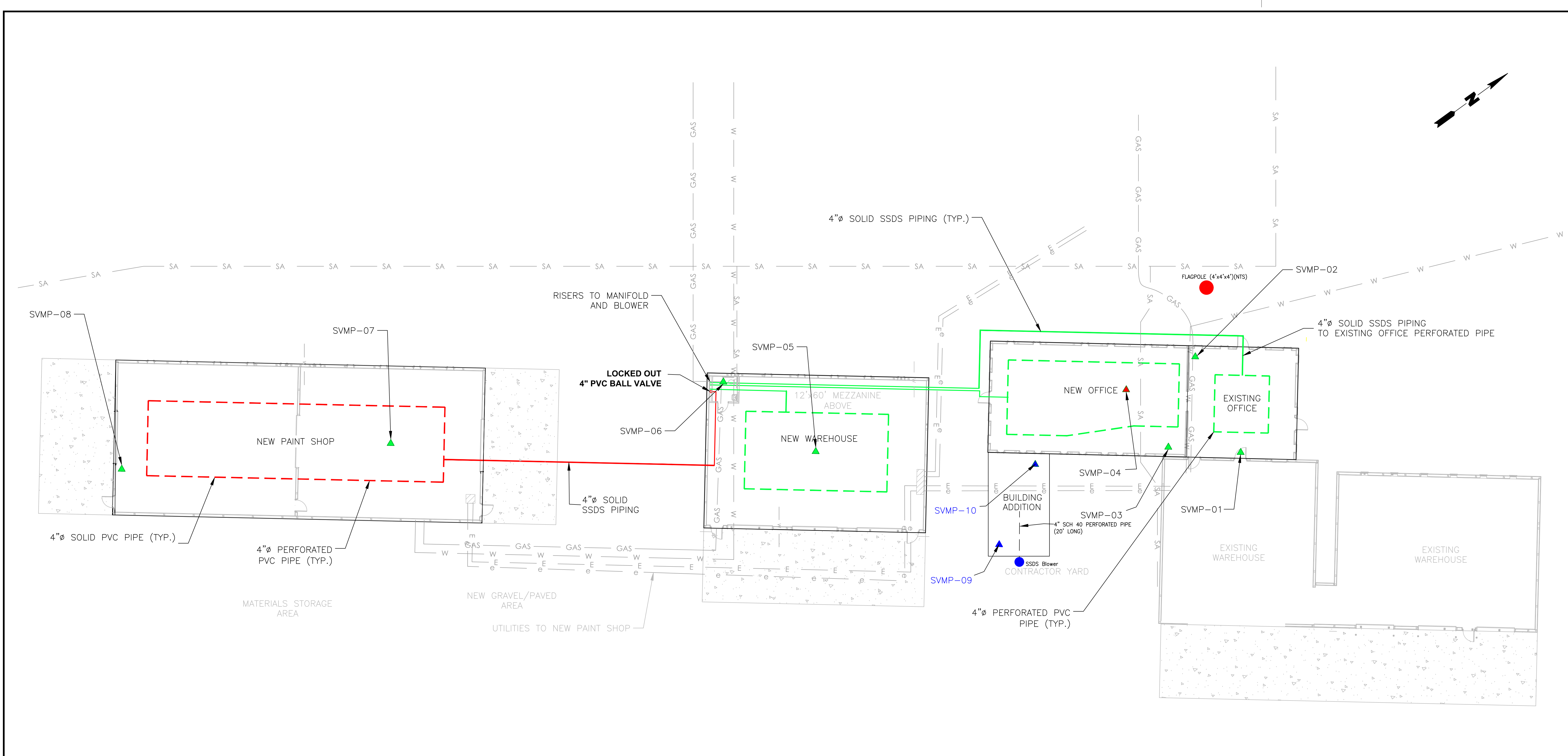
If you have any questions on the above comments, please contact me at 781-569-4000 or brobinson@rouxinc.com.

Sincerely,

ROUX ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read 'BR', is positioned above the printed name and title.

Brian Robinson, PE
Senior Engineer



LEGEND

— GAS — UTILITY - NATURAL GAS
— W — UTILITY - WATER
— E — UTILITY - EXISTING ELECTRICAL
— e — UTILITY - EXISTING DATA
— SA — UTILITY - EXISTING SANITARY SEWER

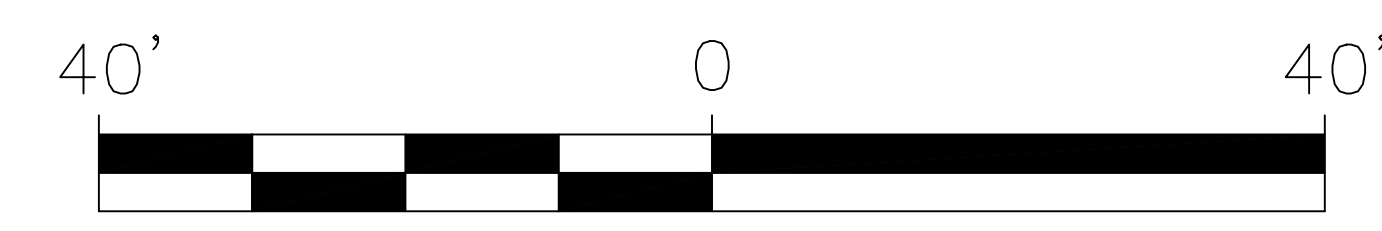
— SSDS SOLID PVC PIPE
— SSDS PERFORATED PVC PIPE

CONCRETE APRON

▲ SOIL VACUUM MONITORING POINT (SVMP)
▲ INACCESSIBLE SOIL VACUUM MONITORING POINT (SEE NOTE 8)

— PROPOSED DECOMMISSIONED SSDS SOLID PVC PIPING
- - - PROPOSED DECOMMISSIONED SSDS PERFORATED PVC PIPING

- NOTES**
- BUILDING PLANS ADAPTED FROM BUILDING DESIGN PREPARED BY ALLIED DESIGN ARCHITECTURAL & ENGINEERING GROUP, P.C. (JOB NO. 072-039509).
 - SITE PLAN ADAPTED FROM BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC (JOB NO. 0233-013-001).
 - SSDS = SUB SLAB DEPRESSURIZATION SYSTEM.
 - BUILDING LOCATIONS, AND UTILITY LOCATIONS ARE APPROXIMATE. THIS DRAWING MAY NOT BE USED TO LOCATE THESE FEATURES.
 - VAPOR BARRIER INSTALLED UNDER THE ENTIRE FOOTPRINTS OF THE EXISTING OFFICE, THE NEW OFFICE, THE NEW WAREHOUSE, AND THE NEW PAINT SHOP.
 - VAPOR BARRIER IS STEGO WRAP VAPOR BARRIER (15 MIL) SEALED WITH STEGO TAPE AND STEGO MASTIC.
 - ALL PIPING SCHEDULE 40 PVC UNLESS OTHERWISE NOTED.
 - THE INACCESSIBLE SVMP IS INTERMITTENTLY RENDERED INACCESSIBLE DUE TO FURNITURE CONFIGURATIONS PRESENT IN THE NEW OFFICE.



1	7/21/15	ADD EXISTING OFFICE PERP. PIPE LOOP, NOTES RE: CAPPING SUCTION POINTS	CG
2	7/26/16	AS-BUILT	CG
NO.	DATE	REVISION DESCRIPTION	INT.

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	OFFICE: MA	PAPER SIZE: ARCH D
	PROJECT NO.: 2317.0001M006	
	DRAWING FILE: 2317.0001M006.136.01.DWG	

Remedial

REMEDIAL ENGINEERING, P.C.

209 Shafter Street
Islandia, New York 11749 (631) 232-2600

PROJECT NAME: REMEDIAL ACTION SUB-SLAB DEPRESSURIZATION SYSTEM AS-BUILT

PROJECT FOR: MJ PAINTING CONTRACTOR CORP.
291 AND 299 HOMER STREET, OLEAN, NEW YORK

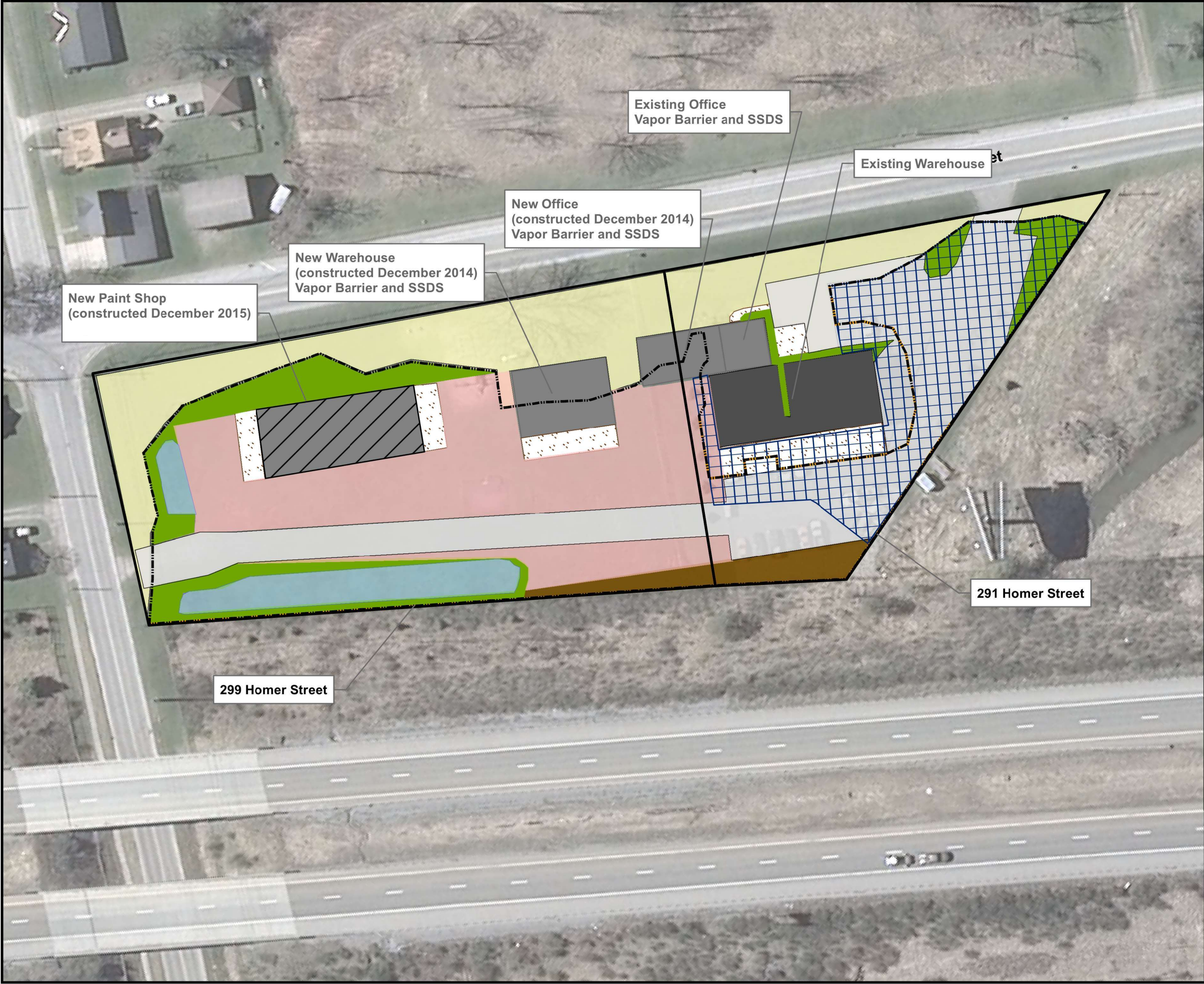
TITLE: NEW PAINT SHOP SSDS DECOMMISSION PLAN

DRAWING NO. 1

DRAWING 1 OF 5

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Legend

- Environmental Easement Boundary
- Excavation Extent of GCM
- Vertical Demarcation Layer
- Horizontal Demarcation Layer
- Site Cover - Asphalt Cover
- Site Cover - Stormwater Swales
- Site Cover - Crushed Limestone Parking Area
- Site Cover - Rip Rap
- Site Cover- Landscape Areas
- Site Cover - Concrete Aprons
- Site Cover - Existing Development
- Site Cover - Analytically Confirmed Existing 1 ft Soil Cover
- Site Cover - Development with Vapor Barrier and SSDS
- Site Cover - Development

NOTES

-All features shown are approximate.

SOURCES

- Aerial photograph is an 0.3 meter resolution image dated March 2013, downloaded from Google Maps.
- Property boundaries are derived from 2015 Wendel Companies Site survey.
- Approximate locations of monitoring wells, soil borings were measured using a handheld GPS by Roux Associates on June 4, 2014.
- Approximate locations of proposed building locations from Figure C-1, Proposed Site Plan, MJ Painting Expansion Project, Benchmark Environmental Engineering and Science, PLLC, November 8, 2013.



Title:			
Engineering Controls			
291 and 299 Homer Street, Olean, New York			
Prepared For: MJ Painting Contractor Corp.			
REMEDIAL ENGINEERING, P.C.	Compiled By: DC	Date: 9/27/2016	FIGURE 2
	Prepared By: AH	Scale: AS SHOWN	
	Project Mgr.: DC	Office: MA	
	File No.: 09.006	Project: 2137.0001M006	