



August 18, 2017

Mr. Anthony Lopes, P.E.  
Project Manager  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 9  
270 Michigan Avenue  
Buffalo, New York 14203-2915

**Re: 229 Homer Street Site  
Site No. C905044  
Cover Soil Assessment - Revised**

Dear Mr. Lopes:

On behalf of our client, Benson Construction and Development, LLC, TurnKey Environmental Restoration, LLC (TurnKey) has prepared this revised Cover Soil Assessment for the 229 Homer Street Brownfield Cleanup Program (BCP) Site No. C905044 (Site).

Based on the revised Remedial Investigation/Alternatives Analysis (RI/AA) report, which is currently in public comment, the planned remedy is a Track 4 commercial cleanup that includes a soil cover system as a component of the remedy. Therefore, we are proposing to supplement previously collected surface soil samples to further assess the upper one foot of soil across the Site to evaluate whether the upper one foot of soil/gravel can be considered suitable cover soil consistent with the planned Track 4 commercial cleanup of the Site.

Based on the RI surface and subsurface soil data, no polychlorinated biphenyls (PCBs), pesticides or herbicides were detected above unrestricted soil cleanup objectives (USCOs). Furthermore, no analytes were detected above Part 375 commercial soil cleanup objectives (CSCOs) in 7 of the 8 surface soil samples collected from 0-2 inches below ground surface (ibgs) [one surface sample (SS-7) exhibited a concentration of arsenic of 21.9 milligrams per kilogram (mg/kg), slightly above its CSCO of 16 mg/kg). Therefore, we are proposing to complete the following sampling to further assess the upper one foot of soil/gravel on-site:

- In the seven sample locations where surface soil (0-2 ibgs) samples were below CSCOs (i.e., SS-1 through SS-6 and SS-8), seven near-surface (NS) samples will be collected using a hand auger, or similar hand tool, from 2-12 ibgs and sampled for Target Compound List (TCL) volatile organic compounds (VOCs), TCL semi-volatile organic compounds (SVOCs) and Target Analyte List (TAL) metals.
- In the area of SS-7 where a slight exceedance of arsenic was observed, three additional SS/NS sample pairs, designated SS/NS-9 through SS/NS-11, will be collected. Surface soil samples will be analyzed for TCL SVOCs and TAL metals; and near-surface samples will be analyzed for TCL VOCs, TCL SVOCs and TAL metals.

- In the gravel areas surrounding the building, three SS/NS sample pairs, designated SS/NS-12 through SS/NS-14, will be collected. Surface soil samples will be analyzed for TCL SVOCs and TAL metals; and near-surface samples will be analyzed for TCL VOCs, TCL SVOCs and TAL metals.

Figure 1 shows the approximate sampling locations. The sample results will be summarized in a letter to NYSDEC with data summary tables and a figure as well as our interpretation of the sample results. Based on the data, we will provide our assessment of whether existing soil/gravel, or any portion thereof, can serve as final on-site cover.

Please contact us if you require anything further on the enclosed.

Sincerely,  
TurnKey Environmental Restoration, LLC



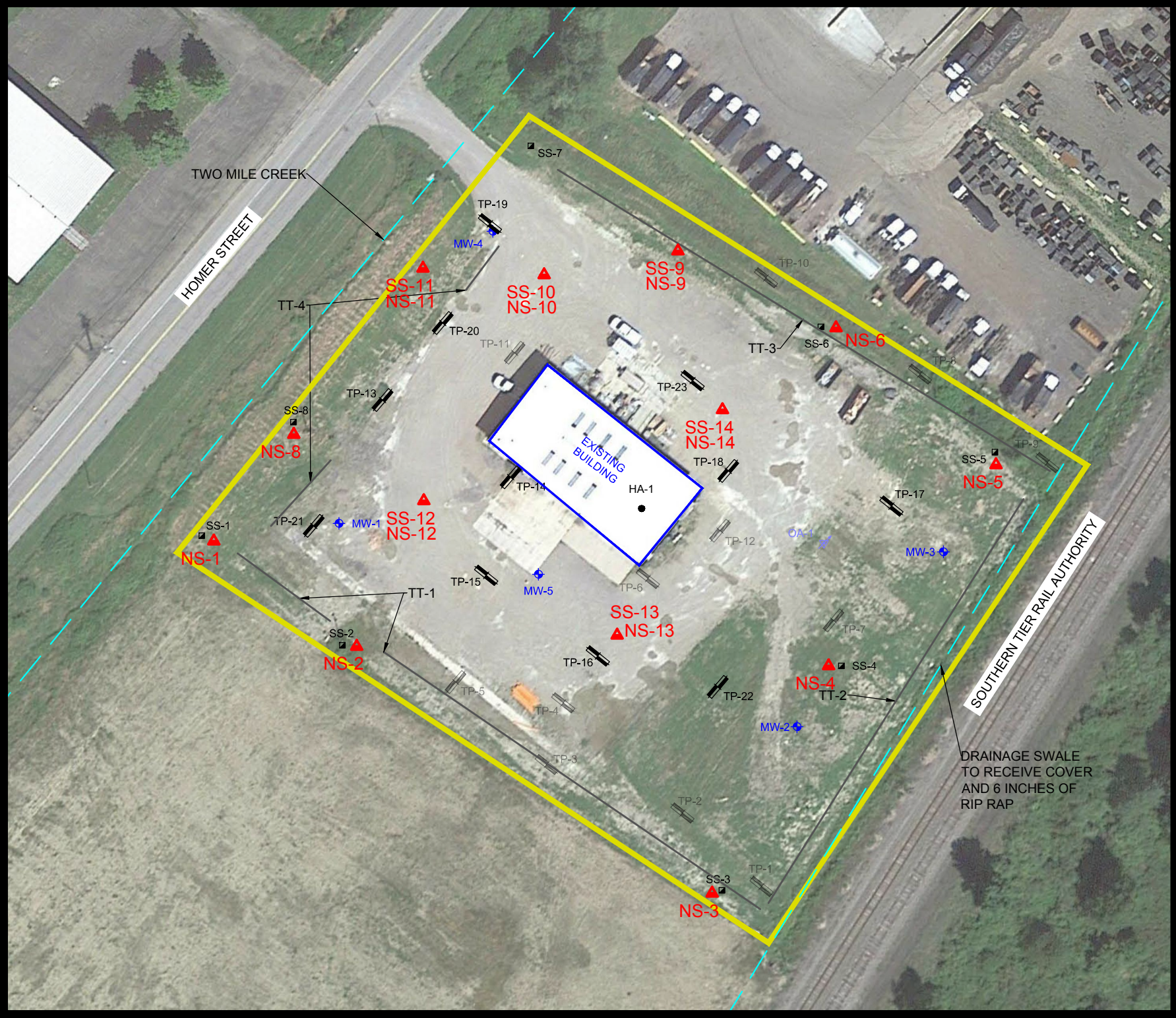
Michael Lesakowski  
Principal/Sr. Project Manager

cc: Don Benson (Benson Construction and Development, LLC)  
Craig Slater, Esq. (The Slater Law Firm, PLLC)  
Chad Staniszewski (NYSDEC Region 9)  
Renata E. Ockerby (NYSDOH)

File: 0225-015-001

DATE: JULY 2017  
DRAFTED BY: RFL

- LEGEND:
- SITE BOUNDARY
  - TEST TRENCH (4)
  - TP-1 PHASE II TEST PIT LOCATION (12)
  - SS-1 SURFACE SOIL SAMPLE (8)
  - MW-1 MONITORING WELL (5)
  - TP-13 RI TEST PIT (11)
  - HA-1 INTERIOR SOIL BORING
  - SS-9 SURFACE (0-2") SOIL SAMPLING LOCATION PLANNED
  - NS-1 NEAR SURFACE (2-12") SOIL SAMPLING LOCATION PLANNED



SCALE: 1 INCH = 80 FEET  
SCALE IN FEET  
(approximate)

## COVER SOIL ASSESSMENT

229 HOMER STREET SITE

OLEAN, NEW YORK  
PREPARED FOR

BENSON CONSTRUCTION AND DEVELOPMENT, LLC

FIGURE 1

2558 HAMBURG TURNPIKE  
SUITE 300  
BUFFALO, NY 14218  
(716) 856-0635

JOB NO.: 0225-015-001

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