ExxonMobil
Refining & Supply Company
1001 Wampanoag Trail
East Providence, Rhode Island 02915
401 434 2900 Telephone
401 431 4028 Facsimile

ExxonMobil
Refining & Supply

July 20, 2012

Mr. Chad Staniszewski
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, NY 14203

RE: EXXON MOBIL OIL CORPORATION
FORMER BUFFALO TERMINAL
625 ELK STREET
BUFFALO, NEW YORK
BROWNFIELD SITE #C915201
RESPONSE TO NYSDEC COMMENTS – SOIL VAPOR SAMPLING

Dear Mr. Staniszewski:

Attached, please find the response to the New York State Department of Environmental Conservation letter entitled "Soil Vapor Sampling" dated June 25, 2012 regarding the above referenced site.

If there are any questions please call me at (401) 434-7356.

Sincerely,

J.A. Abel

Project Manager

cc: Buckeye Terminals LLC
One Babcock Terminal

ENVIRONMENTAL CONSULTING & MANAGEMENT
ROUX ASSOCIATES INC

209 Shafter Street
Islandia, New York 11749 TEL 631-232-2600 FAX 631-232-9898

July 18, 2012

Mr. Joseph Abel
ExxonMobil Corporation
East Providence Terminal
1001 Wampanoag Trail
Riverside, Rhode Island 02915

Re: Response to NYSDEC Letters Entitled:
"Soil Vapor Sampling Report" dated January 19, 2010
"Soil Vapor Sampling Report" dated June 16, 2010 and
"Soil Vapor Sampling" dated June 25, 2012
Former ExxonMobil Buffalo Terminal
ExxonMobil Oil Corporation (Site #C915201)

Dear Mr. Abel:

Roux Associates, Inc. (Roux Associates), on behalf of ExxonMobil Oil Corporation (ExxonMobil) has prepared the following work plan for soil vapor sampling at the ExxonMobil Former Buffalo Terminal (BCP Site #C915201) located at 625 Elk Street in Buffalo, New York. This work plan has been prepared in response to the New York State Department of Environmental Conservation (NYSDEC) letters entitled:

- "Soil Vapor Sampling Report" dated January 19, 2010, which provided comments on the "Second Round Soil Vapor Sampling Report and Scope of Work for Additional Sampling" dated November 6, 2009;
- "Soil Vapor Sampling Report" dated June 16, 2010, which provided additional comments based upon our response letter dated April 14, 2010; and
- "Soil Vapor Sampling" dated June 25, 2012.

Please note that the sampling proposed in the November 6, 2009 document (e.g., additional methane sampling) and the April 14, 2010 letter (e.g., building inventory, questionnaire and potentially indoor air sampling in Building 153 and methane sampling at SV-12) was not completed in 2010 as referenced in the June 25, 2012 NYSDEC letter.

Proposed Scope of Work

Building 153

A subslab soil vapor sample and a duplicate subslab sample were collected in July 2009 from SV-18, located beneath Building 153. Carbon tetrachloride was not detected in either

sample, and concentrations of TCE and TCA were less than the lowest NYSDOH subslab Matrix 1 and 2 values, respectively. However, PCE sampling results exceeded the lowest NYSDOH subslab Matrix 2 value of 100 µg/m³. PCE was detected in sample SV-18 at a concentration of 160 µg/m³, and at SV-18 DUP at a concentration of 110 µg/m³. The following activities are proposed:

- An indoor air questionnaire and building inventory will be completed in building 153, in accordance with Appendix B of the NYSDOH Soil Vapor Intrusion Guidance (NYSDOH, 2006). Since the current activities in the building are limited it is unexpected that the building inventory will identify any current use of CVOCs. Historical product use is unknown at building 153 and, therefore, it is possible that PCE was used within the building in the past.

- Assuming the building inventory does not identify a current interior source of PCE, one indoor air sample will be collected from the office space of building 153. The indoor air sample will be collected in a Summa canister over an 8-hour period using sampling methods in accordance with the NYSDOH Soil Vapor Intrusion Guidance (NYSDOH, 2006).

- An 8-hour subslab soil vapor sample will be collected in a Summa canister from the permanent point located at SV-18. The sub-slab soil vapor sample will be collected concurrently with the indoor air sample.

The field sampling team will maintain a sample log sheet, summarizing the sample identification, date and time of sample collection, identity of samplers, sampling methods and devices utilized, vacuum of canisters before and after samples are collected, and sample analyses. The indoor air and subslab soil vapor samples will be analyzed by an Environmental Laboratory Approved Program (ELAP) certified laboratory for chlorinated volatile organic compounds via USEPA Method TO-15.

Methane

Due to the variability in methane concentrations detected in 2008 and 2009, the following locations will be resampled for methane:

- Subslab soil vapor at SV-1 beneath Building 140;

- Soil vapor at SV-10 near the northwest corner of Building 135 (the location with the highest soil vapor methane concentration in the vicinity of Building 135 in 2008) and SV-11 near the northeast corner of Building 135;

- Crawlspace air at SV-13 beneath Building 135; and

- Soil vapor from SV-12.

Indoor air in the vicinity of SV-1 will be screened with a Lower Explosive Limit (LEL) meter during the sampling. In addition to methane, forensic analysis, including carbon isotope, hydrogen isotope, and fixed gases analyses for assessment of the methane source

(i.e., thermogenic versus biogenic) may be performed at each location. The decision to perform the forensic analyses will be made based upon the concentrations of methane observed in the samples (i.e., if the concentrations are similar to the low levels observed in 2009, the forensic analyses will not be performed; conversely, if methane is detected at a concentration of 12,500 ppm [one quarter of the LEL for methane] or greater, the forensic analyses will be performed).

Sampling and analyses protocols for the methane samples are described in the November 6, 2009 document.

The sampling proposed in this letter will be completed early in the 2012 heating season (September – November 2012) and we will notify the NYSDEC prior to starting the work.

Please call if you call any questions or comments on these responses.

Sincerely,

ROUX ASSOCIATES, INC.

Denise Kmetzo
Senior Risk Assessor

Noelle Clarke
Principal Engineer

Enclosure

✚ (blue)	SOIL VAPOR SAMPLE LOCATION COMPLETED IN OCTOBER/NOVEMBER 2008
✚ (green)	SOIL VAPOR SAMPLE LOCATION COMPLETED IN 2008/2009 (SAMPLE POINT SV-1 WAS RESAMPLED IN JULY 2009)
✚ (red)	SOIL VAPOR SAMPLE LOCATION COMPLETED IN JULY 2009
✚ (magenta)	CRAWLSPACE AIR SAMPLE LOCATION COMPLETED IN JULY 2009
	PROPERTY OWNED AND OPERATED BY ONE BABCOCK STREET, INC. SINCE 1994
	PROPERTY OWNED AND OPERATED BY BUCKEYE TERMINALS, LLC AS OF MAY 4, 2005
	NOTE: EXXONMOBIL OWNS ALL PROPERTY WITHIN THE BCP SITE BOUNDARY THAT IS NOT OWNED BY ONE BABCOCK STREET, INC OR BUCKEYE TERMINALS LLC.
	BCP SITE BOUNDARY
	OPERABLE UNIT BOUNDARY
	GEOGRAPHIC AREA BOUNDARY
	FENCELINE
	EXISTING STRUCTURE
	EXISTING OCCUPIED BUILDING TO BE ASSESSED DURING SOIL VAPOR INVESTIGATION
	HISTORICAL AND CURRENT SEPARATE-PHASE PRODUCT
	EXISTING ROAD
	ACTIVE ABOVE GROUND TANK BERMS
	SANITARY SEWER SYSTEM
	72" BUFFALO SEWER AUTHORITY (BSA) SEWER
	NATURAL GAS LINE
	STORM SEWER PIPING (ONLY SELECTED PIPING IN THE BSPA SHOWN)
	STORM SEWER CATCH BASIN (ONLY SELECTED CATCH BASINS IN THE BSPA SHOWN)
	SOIL SAMPLE IN THE VICINITY OF PROPOSED VAPOR SAMPLE LOCATIONS
	MONITORING WELL

NOTE 1: SV-7 COULD NOT BE INSTALLED AFTER SEVERAL ATTEMPTS DUE TO SHALLOW WATER ENCOUNTERED AT 1.5 FEET BELOW GRADE.

N

100' 0 100'

Title:

SOIL VAPOR, SUB SLAB VAPOR AND CRAWLSPACE AIR SAMPLING LOCATIONS

Prepared For:

EXXONMOBIL OIL CORPORATION

ROUX ASSOCIATES, INC
Environmental Consulting & Management

Compiled by: NC | Date: July 16, 2012
Prepared by: NC | Scale: AS SHOWN
Project Mgr: NC | Office: NY

FIGURE 1