August 8, 2019

Mr. Chad Staniszewski
Mr. Eugene Melnyk
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, NY 14203
OU-2 Site Walk
NYSDEC Site No. C915201C

Dear Mr. Staniszewski & Mr. Melnyk:

On July 30, 2019 representatives from Elk Street Commerce Park, LLC (ESCP), Amec E&E PC (Amec) and the New York State Department of Environmental Conservation (NYSDEC) conducted a comprehensive site walk of Operable Units 2 (OU2) and Operable Unit 3 (OU3). The NYSDEC indicated that several areas around the OU2 warehouses and power station currently have cover systems that do not adequately meet the requirements of the OU2 Decision Document. The specific areas are shown on the attached Figure 1 and include the areas of stone cover to the north and south of the power station building, vegetated and stone areas around the warehouses, the former concrete building slab north of the eastern warehouse and the former concrete ramp on the south side of the eastern warehouse.

Proposed Cover System

ESCP proposes to install the following cover in the areas noted above. These covers are also identified on Figure 1.

- The stoned areas to the north and south of the power station will receive an asphalt pavement comprised of 2.5-inches of binder course and 1.5-inches of top course. Existing stone cover will be removed as necessary for grading purposes. The remaining stone will be prepared for use as subbase material for the pavement. The area immediately adjacent to the door of the substation will be left without pavement as existing pavement grades are above the bottom of door elevation. I thin strip will be excavated and replaced with 12-inches of clean cover to accommodate the door.

- Material will be removed from the vegetated and stone areas around the warehouse as needed to install 12-inches of imported crushed stone cover. This will leave an area of 9,993 square feet of pervious area on OU2 East and represents approximately 0.7% of the OU2 site. The volume of water anticipated to infiltrate into the subgrade from these areas is minimal and will have a negligible effect on the operation of the OU3 groundwater extraction system. The soil stabilization north (upgradient) of this area included stabilizing to the clay surface along Elk Street thus reducing groundwater flow into OU3 from OU2.

A permeable cover consisting of gravel only is not acceptable as it would promote infiltration. A permeable cover could remain in this area provided the cover consisted of 12 inches of "verified clean" soil to maintain a green area for aesthetics. Otherwise a low perm cover such as an asphalt cover is suggested to minimize infiltration.

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- The former concrete building slab directly north of the eastern warehouse will be inspected and repaired as necessary to establish a competent hardscape surface.
- Sediment and debris within the envelop of the concrete ramp will be remove and disposed of offsite. The concrete slab will be broken to allow for drainage of infiltrated stormwater. The ramp will be backfilled with site material and paved to drain away from the building.

If these cover systems are acceptable to NYSDEC, ESCP will immediately proceed with the work. If you have any questions, please contact Rick Egan at (207) 828-3405 or at richard.egan@woodplc.com.

Sincerely,
AMEC E&E, PC

Richard Egan, P.E.

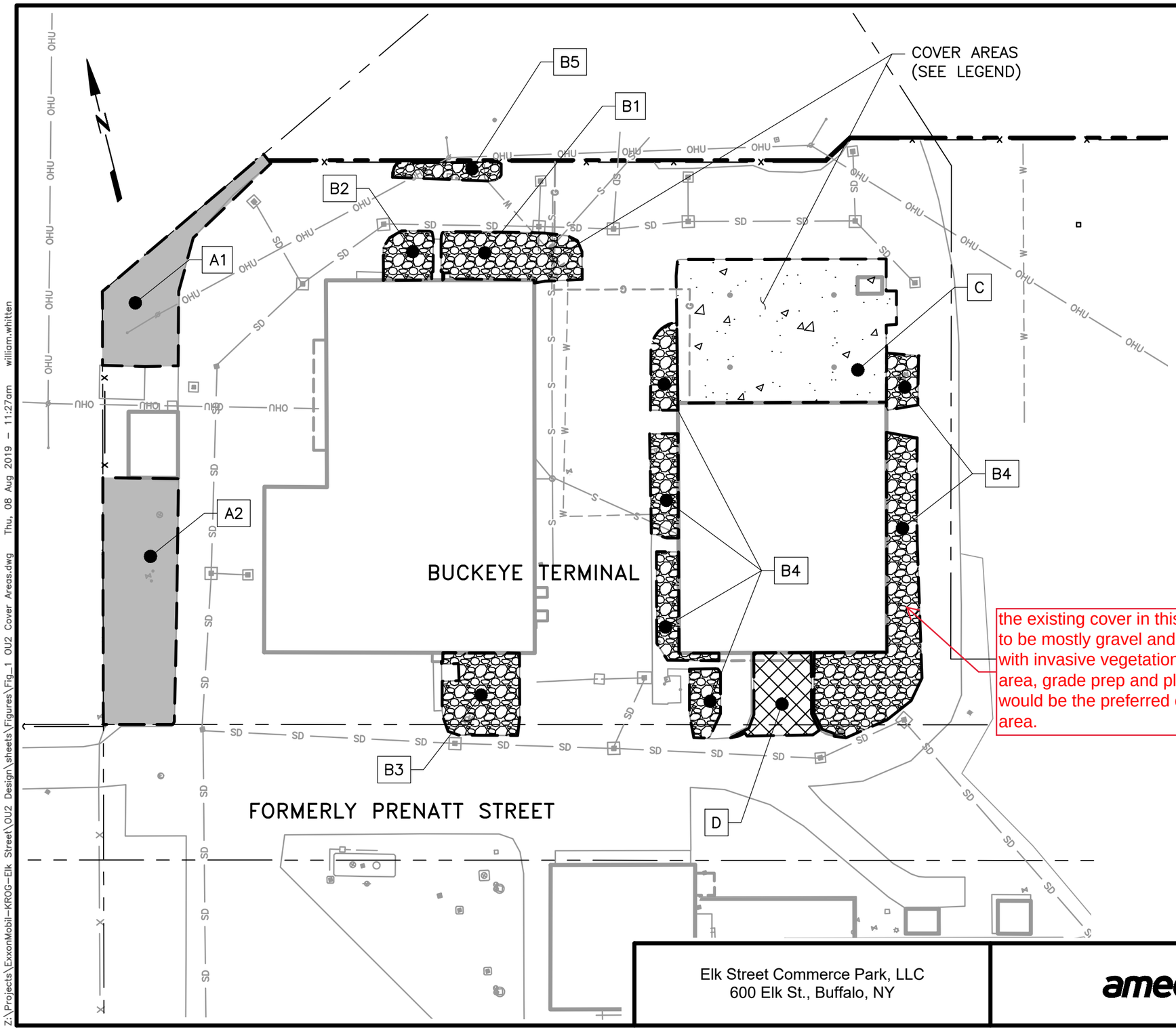
Associate Geotechnical Engineer

John W. Peterson

Associate Project Manager

Attachments

cc: Paul Neureuter ESCP
Arnie Cubins Krog
Ben Genes Krog



LEGEND

A—REMOVE MATERIAL AND PLACE 2.5" BINDER COURSE AND 1.5" TOP COURSE

B—REMOVE MATERIAL AND PLACE 12" CRUSHED STONE

C—INSPECT AND SPOT REPAIR CONCRETE

D—REMOVE DEBRIS AND SEDIMENT AND BACKFILL WITH SITE MATERIALS AND PLACE 2.5" BINDER COURSE AND 1.5" TOP COURSE

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the existing cover in this area appears to be mostly gravel and is overgrown with invasive vegetation. Clearing the area, grade prep and placing asphalt would be the preferred cover in this area.

0 25 50 100
SCALE IN FEET

Prepared/Date: WJW 8/08/19
Checked/Date: RSE 8/08/19

Elk Street Commerce Park, LLC
600 Elk St., Buffalo, NY

amec

OU2
COVER AREAS
Project 3617-16-7397
Figure 1

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