March 19, 2019

Mr. Chad Staniszewski
Mr. Eugene Melnyk
NYS Department of Environmental Conservation
270 Michigan Avenue
Buffalo NY 14203

Subject: **Babcock Street (OU-2 West) Northern Area Remedial Action**
Buffalo, New York

Dear Mr. Staniszewski & Mr. Melnyk:

On behalf of Elk Street Commerce Park, LLC (ESCP), Amec E&E PC (Amec) is proposing the following Remedial Action (RA) for the northern area of OU2 West identified in the *OU2 West Remedial Action Work Plan Addendum*, dated January 11, 2019. The Addendum was approved by NYSDEC in a letter date January 17, 2019. The Addendum described a RA for the southern portion of the site and allowed for an investigation of the northern area from which the results would dictate a RA for this area.

As described in the Addendum, a sampling program was developed for the northern area of the site. The sampling program included collecting samples from four locations at depth intervals of 0 – 2-inches, 2 – 6-inches, and 6 – 12-inches. A sampling event was conducted on January 18, 2019. The soil samples were submitted to TestAmerica laboratory in Amherst, New York under strict chain-of custody via hand delivery by the Amec sampler. TestAmerica completed analyses of the samples for volatile organics (VOCs), semi-volatile organics (SVOCs), pesticides, herbicides, and metals and provided an analytical report under Job Number: 480-148138-1. Analytical test results were presented to NYSDEC in a letter dated February 19, 2019. Additional results were submitted in a subsequent letter dated February 28, 2019.

Remedial Action for Northern Area of OU2 West

The proposed RA would include removal of the top 12-inches of material, placement of a demarcation layer and backfilling with clean imported stone for the northern half of the Northern Area that encompasses sample locations SS-OU2W-01 and SS-OU2W-02. The excavated material would be stabilized on OU-2 East.

Lead concentrations that exceeded commercial SCOs were encountered in SS-OU2W-03. For the area surrounding this location, the proposed RA consists of excavating and stockpiling the soils to the native clay layer that underlies the fill (estimated to be approximately 3 feet deep). The soils stockpile will be sampled for waste characterization including TCLP for lead. If the material fails the TCLP, it will be disposed of off-site as hazardous waste or stabilized with Portland cement and then disposed of off-site as non-hazardous waste.

At sample location SS-OU2W-04, the aggregate polynuclear aromatic hydrocarbon (PAH) concentrations exceeded 500ppm. The proposed RA consists of excavating 25-foot by 25-foot area around the sample location to the depth of the native clay. The excavated material will be stockpiled. A composite sample will be collected for waste characterization for off-site disposal. The remaining soil, outside of this area and located between the SS-OU2W-03 excavation and the southern boundary of the Northern Area, will be excavated to clay and stockpiled in a separate stockpile area. A composite of this material will be sample for waste characterization. If the composite sample has an aggregate PAH concentration greater than 500ppm, the material will be disposed of off-site. If the material has an aggregate PAH concentration less than 500ppm, the material will be relocated to OU2 East and treated by in-situ stabilization in a manner consistent with the OU2 east RAWP.

Sidewall and excavation bottom sampling will be conducted in both the SS-OU2W-03 and SS-OU2W-04 areas consistent with the requirements of DER-10. A demarcation layer will be placed at the bottom of the excavation and the excavation will be backfilled with clean imported stone.

Please contact myself or Dayne Crowley at 724-514-1600 if you have any questions or require any additional information.

Sincerely,

AMEC E&E PC

Digitally signed by Dayne.Crowley
Date: 2019.03.18 15:38:23 -04'00'

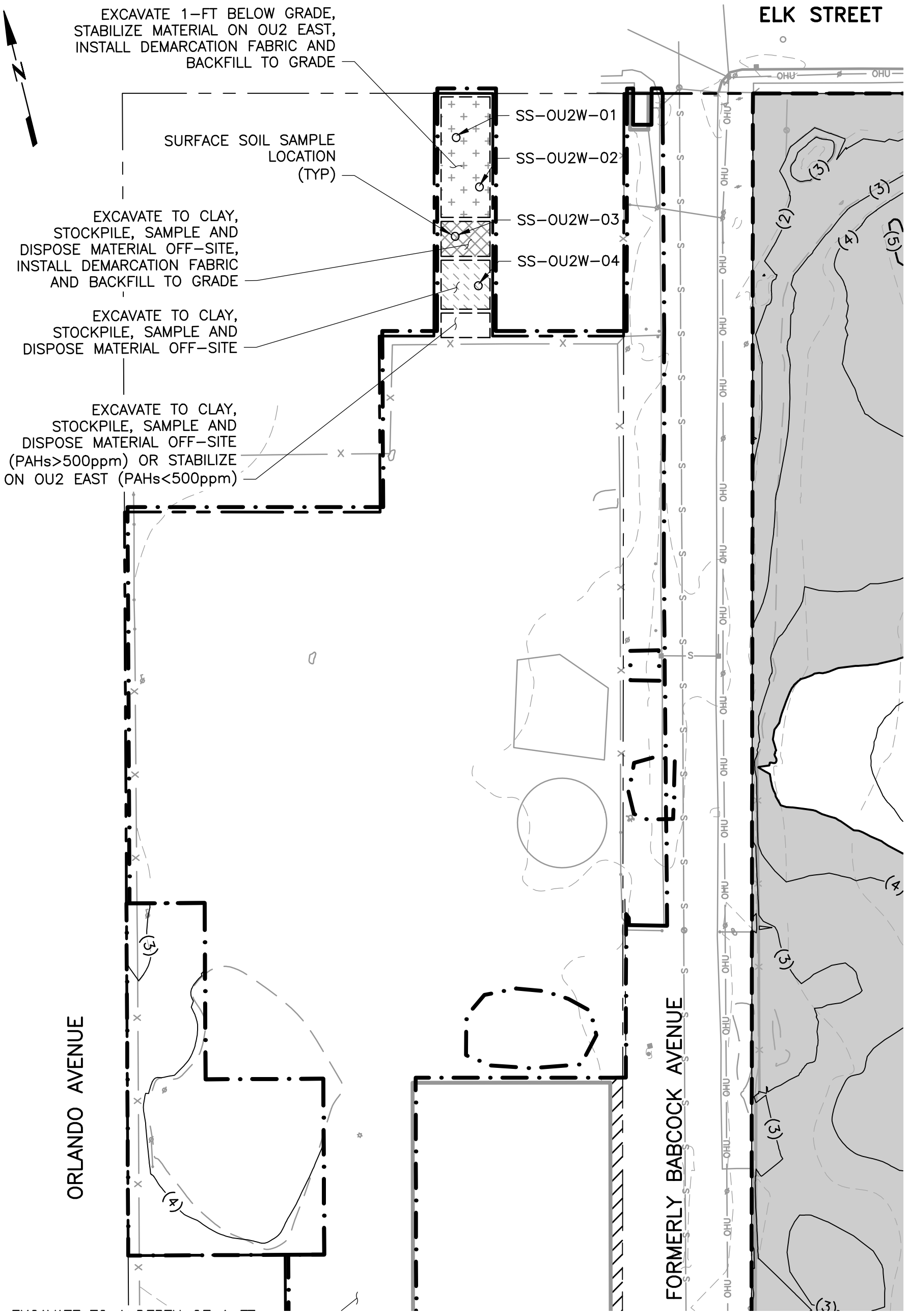
Richard Egan, PE
Engineer of Record

Dayne M. Crowley, P.G.
Senior Principal Hydrogeologist

Attachment

cc: Mr. Paul Neureuter (ESCP)
Mr. Arnie Cubins (Krog)

NOTE
SEE REFERENCE DRAWING A-1190 FOR HISTORICAL DRAWING DEPICTING UNDERGROUND UTILITIES AND STUCTURES WITHIN WORK LIMITS



Prepared/Date: WJW 3/19/19
Checked/Date: RSE 3/19/19

ELK STREET PROPERTY BUFFALO, NY	amec	OU2 WEST EXCAVATION AND SAMPLING Project 3617-16-7397 Figure 1