

June 18, 2013

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 14203-2999

Re: 154 South Ogden Street Site (BCP Site No. C915268)  
Supplemental RI Sampling Plan

Dear Mr. Lopes:

Per comment #11 of your June 13, 2013 draft comment Remedial Investigation/Alternatives Analysis Report letter, Benchmark Environmental Engineering & Science (Benchmark) has prepared this Supplemental Remedial Investigation (RI) Sampling Plan to further characterize the near-surface soils to remain in the western portion of the above-referenced Brownfield Cleanup (BCP) Site beneath the planned demarcation layer and 2-foot final cover system. Our planned scope of work and reporting activities are summarized herein.

### **SCOPE OF WORK**

Following removal of impacted soil/fill related to the Areas of Concern (AOCs) defined in our Interim Remedial Measures (IRM) Work Plan, site grubbing, and site grading to design elevations, Benchmark will collect approximately one near-surface soil/fill sample per acre from the western portion of the BCP Site (see Figure 1). Sample locations were positioned equidistantly between existing sample locations for complete coverage of the western portion of the BCP Site. Each grab sample, identified on Figure 1 as SB-59 thru SB-70, will be collected from the 0 to 2 foot below ground surface (fbgs) interval for analysis of the constituents of concern (COCs), which include Target Compound List (TCL) Semi-Volatile Organic Compounds (SVOCs) (base-neutrals only) via Method 8270 and total RCRA metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver) via Method 6010/7470. Any sample locations showing evidence of impact (e.g., visual/olfactory, elevated PID, staining, stressed vegetation, etc.), may be, upon consultation and consensus between the Project Manager and the Department, analyzed for an agreed upon list of parameters (beyond the previously mentioned COCs) depending the nature of the observed impact (e.g., oily stained areas, if observed, would be analyzed for TCL VOCs, TCL SVOCs [base-neutrals and acid extractables], and PCBs). The Supplemental RI near-surface samples will be submitted to an NYSDOH-ELAP certified laboratory for analysis.

**Strong Advocates, Effective Solutions, Integrated Implementation**

[www.benchmarkturnkey.com](http://www.benchmarkturnkey.com)

2558 Hamburg Turnpike, Suite 300 | Buffalo, NY 14218  
phone: (716) 856-0599 | fax: (716) 856-0583

In addition to the near-surface soil/fill samples described above, field-specific quality assurance/quality control (QA/QC) samples will be collected and analyzed for the same COCs to ensure the reliability of the generated data as described in the Quality Assurance Project Plan (QAPP) (see Section 4 of the RI Work Plan) and to support the required third-party data usability assessment effort (e.g., DUSR). Site-specific QA/QC samples will include matrix spikes, matrix spike duplicates, blind duplicates, and equipment blanks.

Samples for chemical analysis will be analyzed in accordance with USEPA SW-846 methodology with an equivalent Category B deliverable package to meet the definitive-level data requirements. All sample locations will be located with a handheld Trimble GeoXH handheld GPS unit relative to State planar grid coordinates to allow preparation of a Site Plan as well as for subsequent upload of the analytical data to NYSDECs EQUIS database.

### REPORTING

Upon completion of field activities and receipt of the analytical results and DUSR, Benchmark will prepare a letter report summarizing the findings of the Supplemental RI. A figure indicating the final sample locations will be presented along with a summary table of the analytical data. The raw data will be included as an attachment as will the third party DUSR. The Supplemental RI activities described herein and findings thereof will be considered part of the Final RI/AAR, albeit under separate cover. The RI will be considered complete if confirmation concentrations are at or below Industrial SCOs for the eight RCRA metals and the total PAH concentrations are below the CP-51 guidance value for non-residential sites (where cover will be applied) of 500 mg/kg. Otherwise, additional AOC delineation, soil/fill removal, and confirmation sampling may be required in accordance with our IRM Work Plan.

Please contact us if you have any questions or require additional information.

Sincerely,  
Benchmark Environmental Engineering & Science, PLLC



Thomas H. Forbes, P.E.  
Principal Engineer

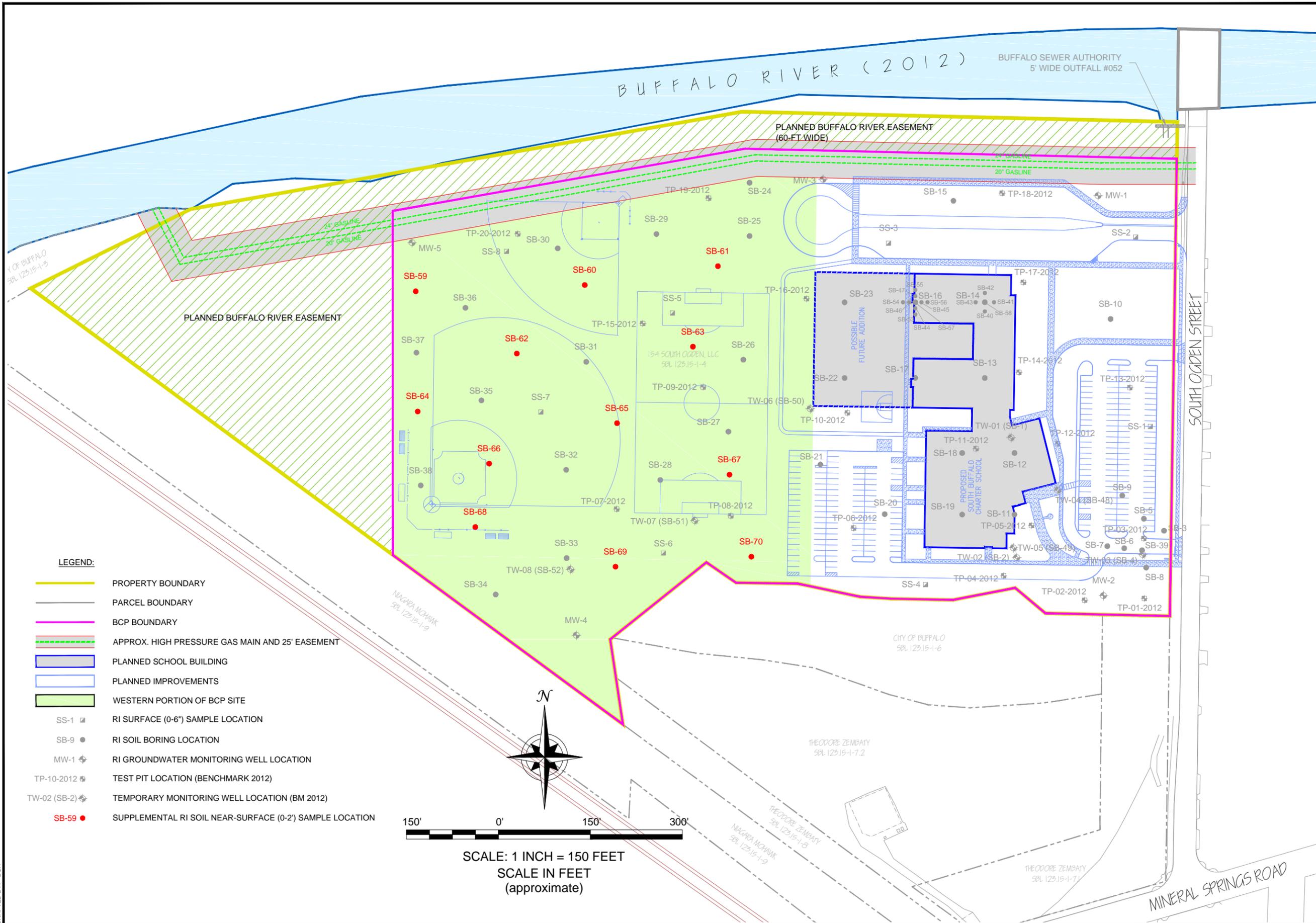


Bryan C. Hann  
Project Manager

cc: J. Neimeier (154 South Ogden, LLC)  
S. Dietz (SBCS)  
M. Doster (NYSDEC – Region 9)  
W. Kuehner (NYSDOH)  
C. Slater (Slater Law)

File: 0249-012-005

# FIGURES



DATE: MARCH 2013  
DRAFTED BY: BCH

**SUPPLEMENTAL RI SAMPLE LOCATIONS**

RI/AA REPORT  
154 SOUTH OGDEN STREET SITE  
BUFFALO, NEW YORK  
PREPARED FOR  
154 SOUTH OGDEN, LLC

**FIGURE 5**