BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

January 29, 2015

Mr. Jaspal Walia, 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: 3 Gates Circle BCP Site (C915272)
Revised Interim Remedial Measure Work Plan

Dear Mr. Walia:

On behalf of our client, Gates Circle Holdings, LLC (GCH), Benchmark Environmental Engineering & Science, PLLC (Benchmark) has prepared this Interim Remedial Measure (IRM) work plan for the 3 Gates Circle Site Brownfield Cleanup Program (BCP) site, located at 3 Gates Circle, Buffalo, New York (Site, see Figures 1 and 2). The purpose of the IRM is to address the remaining No. 6 fuel oil released from two (2) former underground storage tanks (USTs) (NYSDEC Spill No. 0751494) on the western side of the Power Plant and accessible exterior contaminant area identified during the preparation of the Remedial Investigation / Alternative Analysis Report (RI/AAR) to address a Track 4 Restricted Residential Cleanup. The spill number associated with the No. 6 fuel oil was closed in May 2013 after the Site was accepted in the BCP.

BACKGROUND

In 2008, tank tightness testing was completed on the two (2) former 12,000-gallon No. 6 fuel oil USTs located at the Power Plan and the testing failed. In May 2008, soil borings were completed through the concrete slab in the basement of the Power Plant in May 2008 by Environmental Service Group, Inc. (ESG). No. 6 fuel oil was observed within the stone sub-base below the building in five (5) of six (6) soil borings completed. The approximately locations of the six (6) soil borings are shown on Figure 4. No. 6 fuel oil was not observed in soil boring, B-5.

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In August 2008, two (2) USTs and accessible No.6 fuel oil-impacted soil/fill were removed in from the western portion of the Power Plant (see Figures 3 and 4). Due to hospital operations at the time of the removal action, the excavation was limited to:

- accommodate emergency access lanes north of the previous excavation that could not be closed;
- the presence of active utilities at the Site; and
- the Power Plant building and incinerator smoke stack foundations.

During the UST and soil/fill removal action, No. 6 fuel oil was observed coming out of the sub-base beneath the Power Plant in to the excavation.

A remedial system was installed in the vicinity of the former USTs after the excavation was completed. The system which consisted of perforated pipe laterals connected to a manhole to collect No. 6 fuel oil. The No. 6 fuel oil that was accumulated in the manhole was pumped to a sump and then to an oil/water separator. Water from the oil/water separator would be discharged to the Buffalo sewer system and the No. 6 fuel oil would be removed from the separator and disposed from the Site in 55-gallon drum. A key component of the system was steam. Due to the high viscosity of No. 6 fuel oil, steam was used in the vicinity of the perforated laterals to heat the material, decrease the increase the viscosity to increase the removal potential by the remedial system. Because the Power Plant is currently being decommissioned, steam is no longer being generated and the remedial system is not functioning due to the high viscosity (the pumps used in the system are not able to effectively move the No. 6 fuel oil). Therefore, the remaining No. 6 fuel oil will need to be removed by other means.

GCH is preparing to demolish a significant portion of the Power Plant structure on the (see Figures 3 and 4) as we discussed with NYSDEC during our October 22, 2014 meeting. A small portion of the Power Plant that associated with the Site transformers will remain and will not be demolished so the transformers can be reused as part of future development.

As part of the BCP Remedial Investigation (RI) activities, Benchmark completed two (2) soil probes (SB-9 and SB-10) in the basement of the Power Plant, in the vicinity of the portion of the building to remain, see Figure 4. No petroleum product was observed in these two (2) soil borings. Two (2) soil samples were submitted for laboratory from each of these borings, one (1) from the fill material present beneath the building and one (1) from native soil from a depth beneath the fill material. No contaminants were detected in these four (4) samples at concentrations above their respective Part 375 Unrestricted Soil Cleanup Objectives (USCOs, see Table 1). Therefore, it appears that the remaining No. 6 fuel oil is present beneath the western portion of the Power Plant and exterior areas west of the Power Plant not accessible during previous remedial action due to hospital operations (see Figure 4). GCH would like to address the remaining No. 6 fuel oil as an IRM after the Power

Plant is demolished and the sub-base beneath the concrete slab and foundations are accessible.

Additionally, as discussed in the BCP Certificate of Completion meeting on January 15, 2015 at NYSDEC office, GCH indicated they would also like to remove accessible exterior impacted areas that were identified during the RI/AAR preparation as part of the IRM. Therefore, this IRM Work Plan has been revised to include additional excavation activities in addition to those associated with the No 6 fuel oil area at the Power Plant.

INTERIM REMEDIAL MEASURES

This IRM work plan presents the scope of the planned IRM, including preparation tasks, post-demolition soil/fill handling, post-excavation confirmatory sampling, backfill criteria, and reporting. This IRM Work Plan has been prepared in general accordance with the NYSDEC DER-10.

An IRM is being proposed to address the following areas.

- Remaining No. 6 fuel oil and impacted soil/fill to mitigate health and environmental concerns associated with exposure to the petroleum impacted soil/fill after the Power Plant is demolished (see Figures 3 and 4).

- Four (4) areas were identified during the preparation of the RI/AAR that would be required remedial action to achieve a Track 4 Restricted Residential Soil Cleanup (see Figure 5). The analytical results tables from previous investigations and the RI/AAR for these areas are included as Tables 2A, 2B and 3. The results from soil boring 12, 17, and 18 can be found in Table 2A. The results from soil boring SB-5 and SB-6 can be found in Table 2B, and the results from SB-105 through SB-109 are in Table 3. Three (3) of the areas have semi-volatile organic compounds (SVOCs) present in the soil/fill material above the 6NYCRR Part 375 Restricted Residential Soil Cleanup Objective (RRSCO) and the fourth area has mercury present in the fill material above its RRSCO.

Citizen Participation Plan Update

During our October 22nd meeting, GCH informed the NYSDEC that GCH have been using various mean of public outreach to provide the community information regarding the redevelopment plans and activities. NYSDEC requested that the existing Citizen Participation Plan (CPP) for the Site be revised to include information on the public outreach being completed by GCH. The CPP will be updated at resubmitted to NYSDEC.

Utility Clearance

Prior to any intrusive activities, Dig Safely New York (Call 811) will be contacted by the site contractor a minimum of three business days in advance of the work and informed of the intent to perform excavation work at the Site. If underground utilities are present on the property and are anticipated to interfere with intrusive activities, the Applicant and the NYSDEC will be contacted to discuss mitigating measures.

Waste Characterization

Waste characterization samples will be collected in accordance with the disposal and/or recycling facilities requirements prior to mobilization for the IRM. Pre-characterization of the soil will allow for direct loading and off-site transportation at the time of soil removal. Based on the results of the waste characterization sampling, impacted soil will be managed according to all federal, state and local waste disposal regulations.

Removal of Petroleum Impacted Soil/Fill

Following the partial demolition of the Power Plant, petroleum product, impacted soil/fill or other grossly contaminated media, as defined in 6 NYCRR Part 375-1.2(u), will be removed/excavated and transported off-site for disposal, as further discussed herein.

Visual and olfactory observations along with photo-ionization detector (PID) readings will be used to screen soil/fill materials and assist in verifying removal limits of impacted soil/fill. Remedial excavation work will be monitored by a Qualified Environmental Professional (QEP) under Benchmark's employ. Lateral and vertical excavation will continue, as described above, until visually impacted soil/fill is removed, the Part 375 Restricted-Residential Use SCOs (RRSCOs) are achieved based on confirmatory samples, the excavation has reached the property line, or NYSDEC agrees that no further excavation is required.

Petroleum Impacted Soil/Fill Post-Excavation Confirmation Sampling

Post excavation confirmatory samples will be collected from the excavation, with bias toward material exhibiting evidence of visual, olfactory, and/or elevated PID readings, if remaining. Sample locations from excavated areas will include samples from excavation sidewalls and bottom. One sample per 30 linear feet of sidewall and one sample for each 900 square feet of excavation bottom will be collected in accordance with DER-10.

Samples from the excavation will be analyzed for TCL VOCs plus CP-51 List VOCs via EPA Method 8260 and Part 375 and CP-51 list SVOCs via EPA Method 8270. Three (3) samples from the bottom of the excavation will also be analyzed for Part 375 list Metals via EPA Method 6010/7471 and polychlorinated biphenyls (PCBs) via EPA Method 8082. Confirmatory samples will be analyzed in accordance with USEPA methodology with an equivalent Category B deliverables package to facilitate data evaluation by a third-party

validation expert. Expedited turnaround times may be requested for the analytical results to minimize the time that the excavation remains open.

Removal of SVOC and Mercury Impacted Soil/Fill

Four (4) areas of the Site were identified during the preparation of the RI/AAR that would require remediation to achieve a Track 4 Restricted Residential Cleanup. Shallow excavations to remove SVOC-impacted and mercury-impacted soil/fill exceeding RRSCOs are planned for these four (4) areas (see Figure 5). Impacted soil/fill in these areas will be removed/excavated and transported off-site for disposal.

It is estimated that approximately 545 cubic yards (cy) of soil/fill will be removed to a depth of 2 fbgs, as shown on Figure 5, from these four (4) areas. The extent of excavation will be adjusted as determined by field observations and confirmatory sample results. Visual and olfactory observations along with photo-ionization detector (PID) readings will be documented.

Remedial excavation work will be monitored by a QEP under Benchmark's employ. The lateral extent of the excavation will be based on the analytical results, which will achieve the Part 375 RRSCOs. Lateral excavation will continue until the RRSCOs are achieved based on confirmatory samples, the excavation has reached the property line, or NYSDEC agrees that no further excavation is required.

SVOC and Mercury Impacted Soil/Fill Post-Excavation Confirmation Sampling

Post excavation confirmatory samples will be collected from the four (4) excavation areas, with bias toward material exhibiting evidence of visual, olfactory, and/or elevated PID readings. Sample locations from excavated areas will include samples from excavation sidewalls and bottom. One sample per 30 linear feet of sidewall and one sample for each 900 square feet of excavation bottom will be collected in accordance with DER-10.

Confirmatory samples from the three (3) SVOC-impacted excavation areas will be analyzed for Part 375 list SVOCs via EPA Method 8270.

Confirmatory samples from the one (1) mercury excavation area will be analyzed for mercury via EPA Method 7471.

Confirmatory samples will be analyzed in accordance with USEPA methodology with an equivalent Category B deliverables package to facilitate data evaluation by a third-party validation expert. Expedited turnaround times may be requested for the analytical results to minimize the time that the excavation remains open.

Off-Site Transportation and Disposal of Non-Hazardous Soil/Fill

Based upon waste characterization sampling, the materials to be excavated as part of the IRM will be properly disposed of off-site as either hazardous or non-hazardous materials. Excavated petroleum-impacted soil/fill will be transported off-site for disposal at a permitted disposal facility by licensed haulers. The disposal facility will provide waste manifests and disposal receipts, which will be included with the Final Engineering Report (FER).

Groundwater Management

If necessary, water removed from remedial excavations and/or surface water running into the excavation during the impacted soil removal will be handled on-site prior to discharge to the municipal sewer with prior approval from the City of Buffalo to obtain any necessary temporary sewer discharge permit.

In general, water removed from excavations will be stored/settled in a portable storage tank, and if deemed necessary, will be pumped through a bag or cartridge filter prior to treatment using granular activated carbon (GAC) before discharge to the sewer. Following completion of excavation work, settled solids remaining in the tank and spent filter bags will be disposed of off-site.

If the accumulated waters require pre-treatment, the spent GAC will be characterized and regenerated off-site, or disposed at a permitted disposal facility in accordance with applicable federal and state regulations. The storage tank(s) will be decontaminated via pressure washing and the sediments generated will be drummed for proper disposal.

Excavation Backfill

Following NYSDEC concurrence that the remedial excavation is complete, the excavation will be backfilled with approved backfill material that meets Part 375-6.7(d), in accordance with DER-10.

Backfill material may consist of the following materials:

- Gravel, rock, or stone, consisting of virgin material, from a permitted mine or quarry may be imported, without chemical testing, if it meets the requirements of DER-10, or as otherwise approved by NYSDEC.
- Recycled concrete or brick from a NYSDEC-registered construction and demolition debris processing facility may be imported, without chemical testing, if it meets the requirements of DER-10, or as otherwise approved by NYSDEC.
- Imported soil/fill originating from known off-site sources having no evidence of disposal or releases of hazardous substances, hazardous, toxic or radioactive wastes, or petroleum, and which meets the chemical criteria for Restricted-Residential Use Sites in DER-10, Appendix 5. No off-site materials meeting the

definition of a solid waste as defined in 6NYCRR, Part 360-1.2(a) shall be used as backfill.

- On-site reuse of soil/fill that is placed at least two-feet below the final surface grade, which meets Part 375 Restricted-Residential Use SCOs and is free from visual and olfactory evidence of impact.
- Reuse of on-site building material such as brick, concrete block, concrete foundations and concrete walkways that have been crushed on-site and meets Part 375-6.7(d), in accordance with DER-10.

As indicated above, soil/fill material, if imported to the Site, will be subject to characterization requirements in accordance with DER-10 Table 5.4(e)10. Characterization testing will be performed by an independent, NYSDOH ELAP-approved laboratory. An equivalent Category B deliverables package will be furnished with the data to allow data evaluation and preparation of a Data Usability Summary Report (DUSR) by an independent, third party data validation expert. Quality Assurance (QA) samples will be collected to support the data evaluation. The QA samples will include a minimum of one matrix spike, one matrix spike duplicate, and one blind duplicate per 20 verification samples.

Community Air Monitoring

Real-time community air monitoring will be performed during IRM activities at the Site. Specifically, particulate and VOC monitoring will be performed along the downwind perimeter of the work area during subgrade excavation, grading and soil/fill handling activities, per the Community Air Monitoring Plan (CAMP) included in Benchmark's Health and Safety Plan of our Remedial Investigation Work Plan dated May 2013. The CAMP is consistent with the requirements for community air monitoring at remediation sites as established by the New York State Department of Health (NYSDOH) and NYSDEC. Accordingly, it follows procedures and practices outlined under NYSDEC's DER-10 (May 2010) Appendix 1A (NYSDOH's Generic Community Air Monitoring Plan) and Appendix 1B (Fugitive Dust and Particulate Monitoring).

Reporting

A summary letter will be prepared after the IRM activities are complete. It will provide a tabularization of the confirmatory soil sample results and briefly discuss the activities completed. The full details of the IRM activities, along with validation results, disposal documentation, CAMP monitoring data, photographic documentation, etc. will be included in the Final Engineering Report (FER). At a minimum, the IRM Section of the FER will include:

- Text describing that the excavation activities were performed in accordance with this Work Plan.

- A map showing the lateral limits of the excavation areas;

- Summaries of unit quantities, including: volume of soil/fill excavated; disposition of excavated soil/fill and collected ground/surface water; volume/type/source of backfill; and volume of ground/surface water pumped and treated;

- Disposal documentation of the waste materials generated;

- Planimetric map showing location of confirmatory and other sampling locations with sample identification labels/codes;

- Tabular comparison of verification and other sample analytical results to SCOs. An explanation shall be provided for any results exceeding acceptance criteria;

- A summary of the DUSR along with the validated results;

REMEDIAL INVESTIGATION WORK PLAN DEVIATION REQUEST

GCH would like to request a deviation from the 3 Gates Circle Remedial Investigation Work Plan, specifically the test pits that were proposed in Section 3.2.2, as stated in the work plan "The on-site sewers, drain lines, and underground utilities in the area near the Power Plant will be identified and accessible bedding material will be evaluated for impacts. Test Pits will be excavated adjacent to the utilities and the soil/fill will be field screened for the presence of VOCs using a field PID equipped with a 10.6 eV lamp and inspected for visual and/or olfactory indications of impacts. If indications of contamination are documented, the NYSDEC will be notified and soil samples will be collected for chemical analysis consistent with Section 3.2.6."

GCH would like to forego the completion of the test pits because:

- an IRM is now being proposed by this work plan to address the remaining No. 6 fuel oil and impacted soil/fill after the Power Plant is demolished. The previous was to address the No. 6 fuel oil and impacted soil/fill as the final remedy.
- many of the utilities identified in the vicinity of the Power Plant are at depths of 8 feet below ground surface (fbgs) or shallower. Previous investigations completed by Benchmark and others in the vicinity of the Power Plant did not identified petroleum contamination or signs of petroleum contamination until depths greater than 8 fbgs.
- GCH would prefer to assess the delineation and removal actions as a "design-build" effort to minimize costs associated with delineation/investigation and just address the

remaining product and contamination once accessible after demolition, regardless of the results of the additional test pits.

GCH would like NYSDEC-approval to forego the utility test pits discussed in Section 3.2.2, and delineate/address the remaining No. 6 fuel oil and associated contaminated soil/fill as part of the IRM. Once the Power Plant is demolished and the foundation/floor slabs can be removed, remedial activities can proceed to remove the remaining No. 6 fuel oil encountered as needed to achieve the RRSCO cleanup goals for the Site.

Please do not hesitate to contact us if you have any questions.

Sincerely,
Benchmark Environmental Engineering & Science, PLLC

Christopher Boron
Sr. Project Manager

Thomas H. Forbes, P.E.
Principal Engineer

ec: D. Elia (Montante Construction)
T. Vaeth (TM Montante Development)
C. Stewart (Montante Construction)
C. Slater (Slater Law)
M. Doster (NYSDEC R9)

File: 0309-014-001

TABLE

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

TABLE 1

SUMMARY OF REMEDIAL INVESTIGATION
SUBSURFACE SOIL/FILL SAMPLE ANALYSIS RESULTS

REMEDIAL INVESTIGATION / ALTERNATIVE ANALYSIS REPORT

3 GATES CIRCLE
BUFFALO, NEW YORK

PARAMETER[1]	Unrestricted Use SCOs[2]	Restricted Residential Use SCOs [2]	SB-9 (0.7-2')	SB-9 (6-8')	SB-10 (0.7-4')	SB-10 (14-16')
Volatile Organic Compounds (VOCs) - mg/Kg [3]						
1,2,4-Trimethylbenzene	3.6	**52**	ND	ND	--	--
1,3,5-Trimethylbenzene	8.4	**52**	ND	ND	--	--
Acetone	0.05	**100**	0.0047 J	0.0073 J	--	--
Benzene	0.06	**4.8**	ND	ND	--	--
Cyclohexane	--	--	ND	ND	--	--
Ethylbenzene	1	**41**	ND	ND	--	--
Methyl tert butyl ether (MTBE)	0.93	**100**	0.00099 J	0.0011 J	--	--
Methylcyclohexane	--	--	ND	ND	--	--
Methylene chloride	0.05	**100**	ND	0.0039 J	--	--
Tetrachloroethene	1.3	**19**	ND	ND	--	--
Toluene	0.7	**100**	ND	ND	--	--
m&p-Xylene	See Total Xylene	**See Total Xylene**	0.00022 J	0.0005 J	--	--
o-Xylenes	See Total Xylene	**See Total Xylene**	ND	ND	--	--
Total Xylenes	0.26	**100**	0.00022	0.0005	--	--
Semi-Volatile Organic Compounds (SVOCs) - mg/Kg [3]						
2-Methylnaphthalene	--	--	ND	ND	ND	ND
Acenaphthene	20	**100**	ND	ND	ND	ND
Anthracene	100	**100**	ND	ND	ND	ND
Benzo(a)anthracene	1	**1**	ND	ND	ND	ND
Benzo(a)pyrene	1	**1**	ND	ND	ND	ND
Benzo(b)fluoranthene	1	**1**	ND	ND	ND	ND
Benzo(ghi)perylene	100	**100**	ND	ND	ND	ND
Benzo(k)fluoranthene	0.8	**3.9**	ND	ND	ND	ND
Bis(2-ethylhexyl) phthalate	--	--	ND	ND	ND	ND
Butyl benzyl phthalate	--	--	ND	ND	ND	ND
Carbazole	--	--	ND	ND	ND	ND
Chrysene	1	**3.9**	ND	ND	ND	ND
Dibenzo(a,h)anthracene	0.33	**0.33**	ND	ND	ND	ND
Dibenzofuran	7	**59**	ND	ND	ND	ND
Fluoranthene	100	**100**	ND	ND	ND	ND
Fluorene	30	**100**	ND	ND	ND	ND
Indeno(1,2,3-cd)pyrene	0.5	**0.5**	ND	ND	ND	ND
Naphthalene	12	**100**	ND	ND	ND	ND
Nitrobenzene	--	--	ND	ND	ND	ND
Phenanthrene	100	**100**	ND	ND	ND	ND
Pyrene	100	**100**	ND	ND	ND	ND
Total Metals - mg/Kg						
Aluminum	--	--	--	--	--	--
Antimony	--	--	--	--	--	--
Arsenic	13	**16**	--	--	2.4	2.4
Barium	350	**400**	--	--	57	33
Beryllium	7.2	**72**	--	--	--	--
Cadmium	2.5	**4.3**	--	--	ND	0.04 J
Calcium	--	--	--	--	--	--
Chromium	30	**180**	--	--	10	5.8
Cobalt	--	--	--	--	--	--
Copper	50	**270**	--	--	--	--
Iron	--	--	--	--	--	--
Lead	63	**400**	--	--	8.6	7.7
Magnesium	--	--	--	--	--	--
Manganese	1600	**2000**	--	--	--	--
Mercury	0.18	**0.81**	--	--	ND	ND
Nickel	30	**310**	--	--	--	--
Potassium	--	--	--	--	--	--
Selenium	3.9	**180**	--	--	ND	ND
Silver	2	**180**	--	--	ND	ND
Sodium	--	--	--	--	--	--
Vanadium	--	--	--	--	--	--
Zinc	109	**10000**	--	--	--	--
Polychlorinated biphenyls (PCBs) - mg/Kg [3]						
Total PCBs	0.1	**1**	ND	ND	--	--
Pesticides and Herbicides - mg/Kg [3]						
2,4,5-T	--	--	ND	ND	--	--
2,4-D	--	--	ND	ND	--	--
4,4'-DDD	0.0033	**13**	ND	ND	--	--
4,4'-DDE	0.0033	**8.9**	ND	ND	--	--
4,4'-DDT	0.0033	**7.9**	ND	ND	--	--
cis-Chlordane	--	--	ND	ND	--	--
Dieldrin	--	--	ND	ND	--	--

Notes:

1. Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.
2. Values per NYSDEC Part 375 Soil Cleanup Objectives (SCOs).
3. Sample results were reported by the laboratory in ug/kg and converted to mg/kg for comparisons to SCOs.

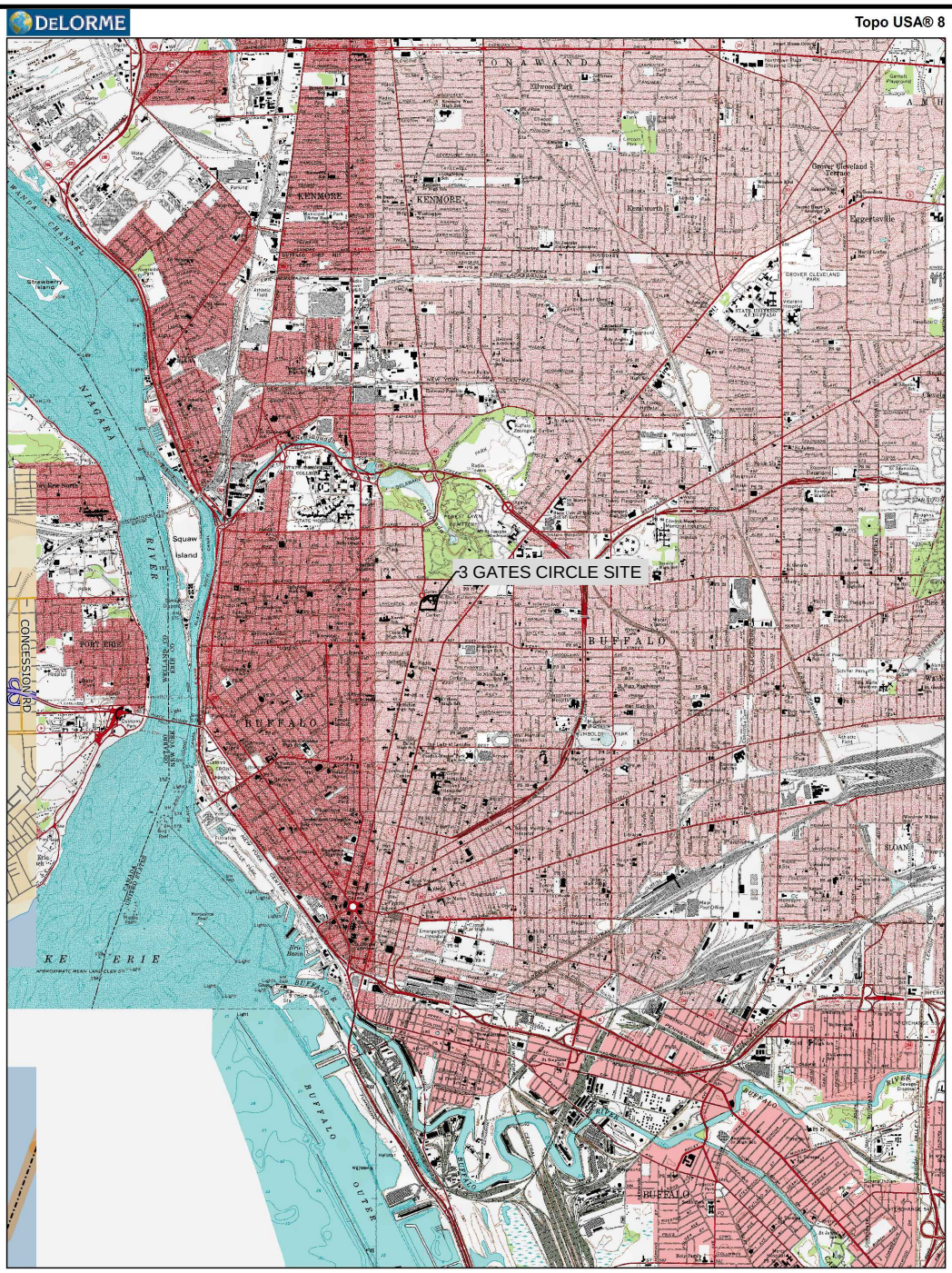
Definitions:

ND = Parameter not detected above laboratory detection limit.
"--" = No value available for the parameter; Parameter not analysed for.
J = Estimated value; result is less than the sample quantitation limit but greater than zero.
B= Compound was found in the blank and sample.

Bold	= Result exceeds Unrestricted Use SCOs.
Bold	= Result exceeds Restricted Residential Use SCOs.

FIGURES

FIGURE 1



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PROJECT NO.: 0309-014-001

DATE: NOVEMBER 2014

DRAFTED BY: BLR/NTM

SITE LOCATION AND VICINITY MAP
IRM WORK PLAN

BROWNFIELD CLEANUP PROGRAM

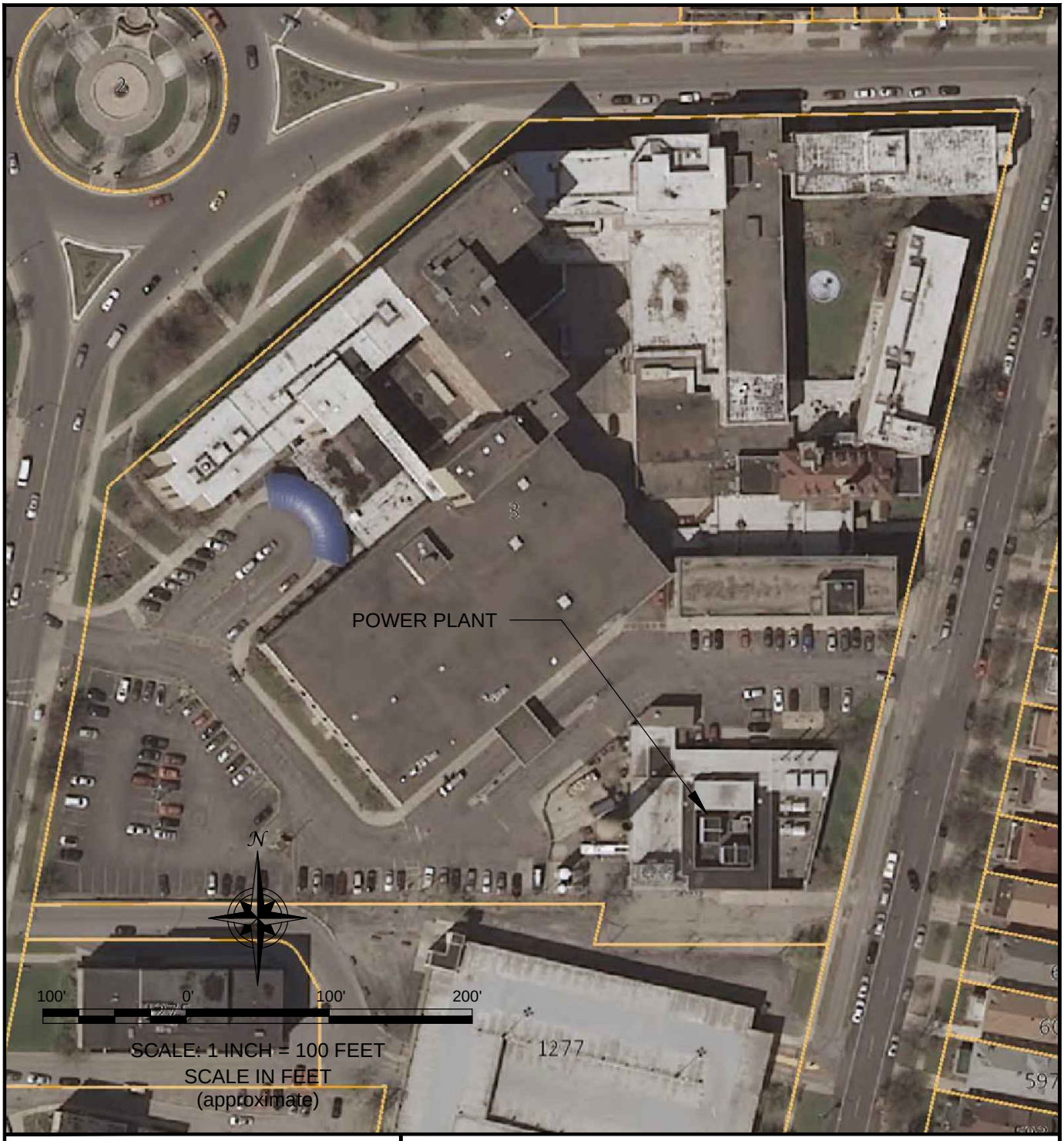
3 GATES CIRCLE SITE

BUFFALO, NEW YORK

PREPARED FOR

GATES CIRCLE ASSOCIATES, LLC

FIGURE 2



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SITE PLAN
IRM WORK PLAN

BROWNFIELD CLEANUP PROGRAM

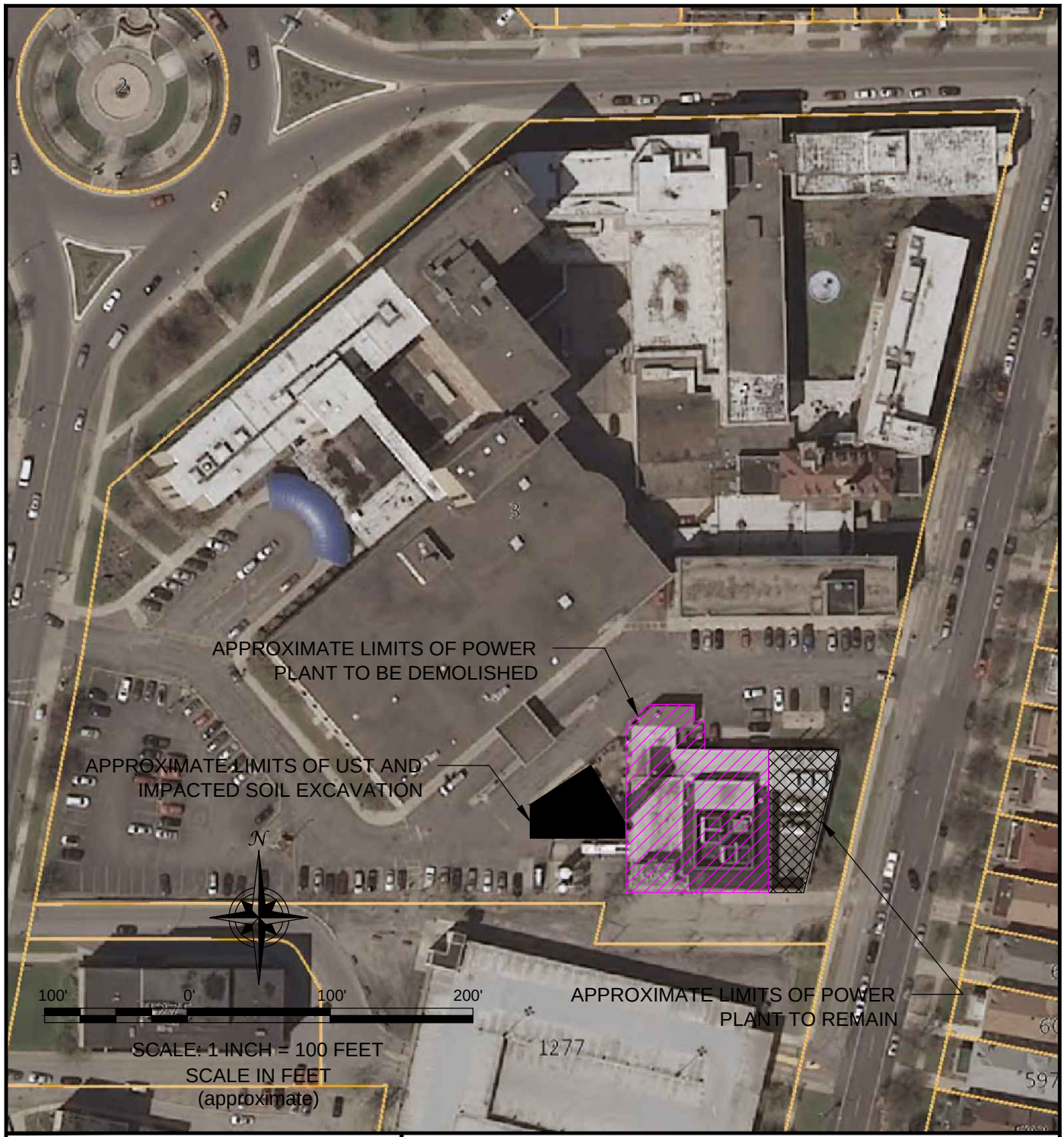
3 GATES CIRCLE SITE

BUFFALO, NEW YORK

PREPARED FOR

GATES CIRCLE ASSOCIATES, LLC

FIGURE 3



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DRAFTED BY: BLR/NTM

POWER PLANT PREVIOUS REMEDIAL ACTION AND IRM PLAN

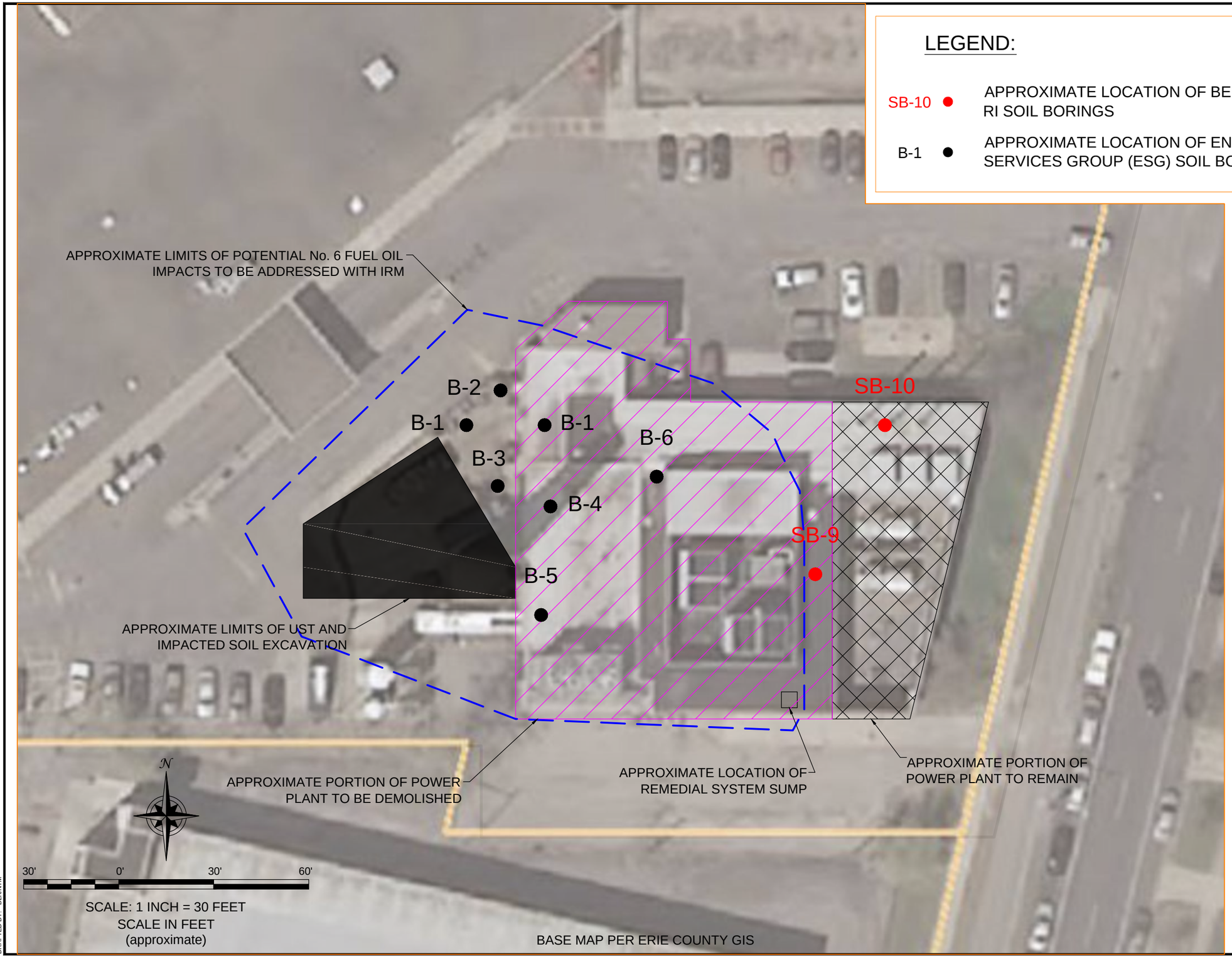
BROWNFIELD CLEANUP PROGRAM

3 GATES CIRCLE SITE

BUFFALO, NEW YORK

PREPARED FOR

GATES CIRCLE ASSOCIATES, LLC



DATE: NOVEMBER 2014
DRAFTED BY: BLR/NTM

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JOB NO.: 0309-014-001

POTENTIAL EXTENT OF No. 6 FUEL OIL CONTAMINATION

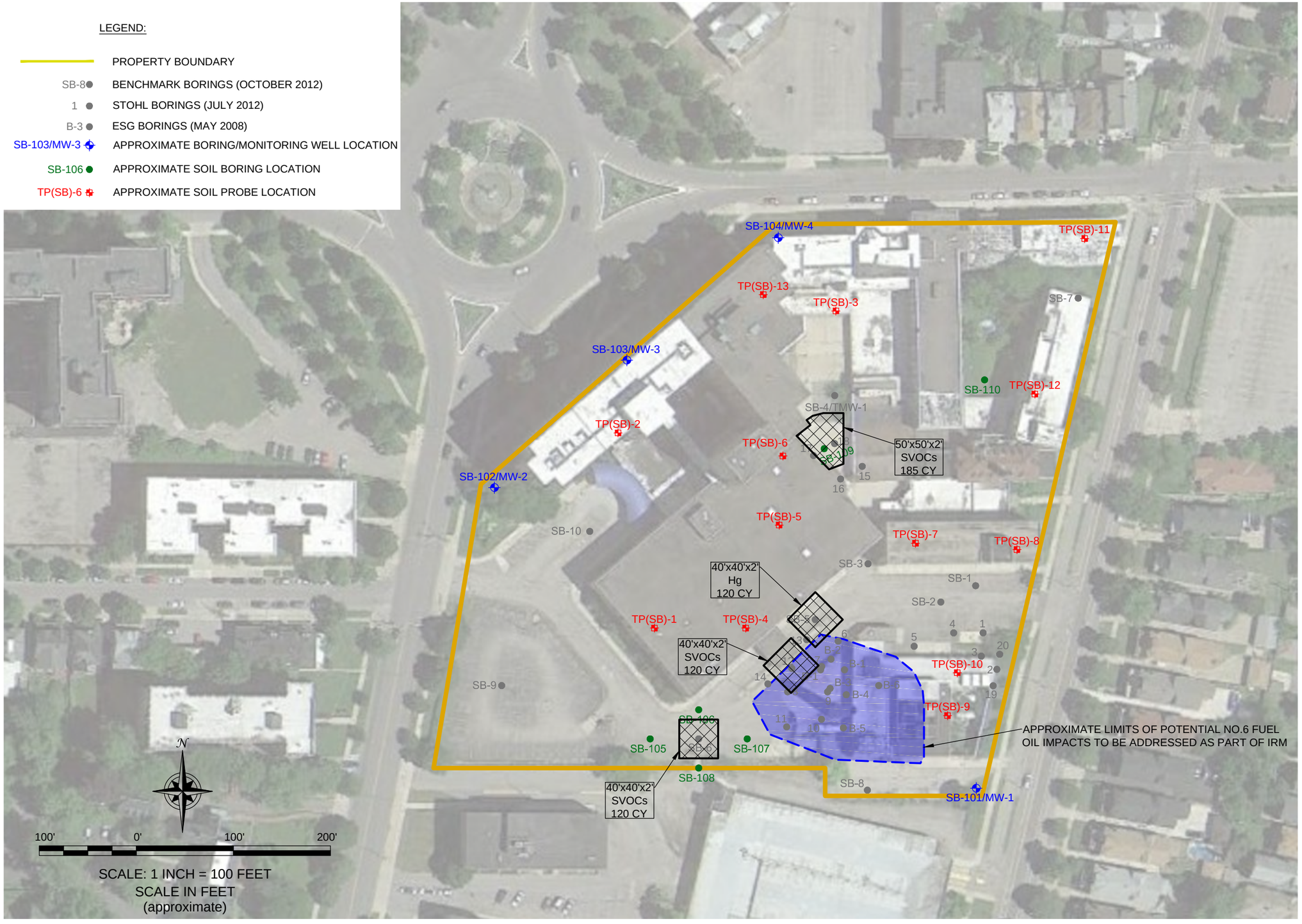
INTERIM REMEDIAL MEASURES WORK PLAN
3 GATES CIRCLE SITE
BUFFALO, NEW YORK
PREPARED FOR
GATES CIRCEL ASSOCIATES, LLC

FIGURE 4

F:\CAD\Benchmark\Gates Circle Associates\IRM Work Plan\Figure 5; Track 4 RRC.dwg

LEGEND:

- PROPERTY BOUNDARY
- SB-8 BENCHMARK BORINGS (OCTOBER 2012)
- 1 STOHL BORINGS (JULY 2012)
- B-3 ESG BORINGS (MAY 2008)
- SB-103/MW-3 APPROXIMATE BORING/MONITORING WELL LOCATION
- SB-106 APPROXIMATE SOIL BORING LOCATION
- TP(SB)-6 APPROXIMATE SOIL PROBE LOCATION



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TRACK 4 RESTRICTED RESIDENTIAL CLEANUP

INTERIM REMEDIAL MEASURE WORK PLAN
BROWNFIELD CLEANUP PROGRAM
3 GATES CIRCLE SITE
BUFFALO, NEW YORK

PREPARED FOR
GATES CIRCLE HOLDINGS, LLC

FIGURE 5