January 28, 2015

Mr. Eugene Melnyk, 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: Supplemental Investigation Activities
1050-1088 Niagara Street Site (C915277)

Dear Mr. Melnyk:
As discussed at the January 21, 2015 meeting, supplemental investigation activities are planned for the above reference Site. This Supplemental Investigation Work Plan is meant to provide details of the planned activities, in association with the NYSDEC approved Remedial Investigation Work Plan (RIWP - May 2014 revised). Preliminary analytical summary tables, figures and field logs were provided electronically for your review.

The supplemental investigation will focus on assessment of on-Site groundwater, delineating localized soil/fill impacts in the vicinity of MW-1 and NS-5, and visual assessment of the western bank surface cover material. Support documents in the approved RIWP, including the Health and Safety Plan (HASP), Quality Assurance Project Plan (QAPP), Field Operating Procedures (FOPs), and Project Documents will be followed during the supplemental investigation. Details of the planned supplemental investigation are provided below.

Groundwater Investigation
During the initial RI field activities, soil borings were advanced across the 1088 Niagara Street parcel to depths ranging between 20 and 28 feet below ground surface (fbgs) without encountering overburden groundwater. The supplemental groundwater assessment will include the advancement and completion of MW-1, MW-3, MW-4 and MW-5. Installation and development of the monitoring wells will be in accordance with the approved work plan.

After completion of development of the wells, groundwater samples will be collected and analyzed in accordance with the approved work plan. As requested by the Department, tentatively identified compounds (TICs) for volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) will also be analyzed and reported by the laboratory.

Groundwater samples for VOCs will also be collected from the interior temporary wells TMW-1, TMW-2 and TMW-3.

MW-1 Subsurface Soil Delineation
Based on the initial findings of the RI, subsurface soils from the MW-1 soil boring were elevated for polychlorinated biphenyls (PCBs) above Part 375 Commercial Use Soil Cleanup Objectives (CSCOs). Based on the isolated exceedance, a delineation of the MW-1 area will be completed.

Three (3) step-out soil borings are planned to be completed to the north, south and west of the MW-1 boring location. Borings will be advanced to a minimum depth of 12 feet below ground surface (fbgs). Soil samples will be collected from the 8-10 fbgs target range (i.e., same depth as previous impacts) and submitted for laboratory analysis of PCBs. Additional soil samples will be collected from the underlying 10-12 fbgs depth and held by the laboratory for subsequent analysis if results exceed CSCOs.

Loading Dock and Western Boundary Assessment

Based on the preliminary findings of the RI, elevated metals are present along the western boundary of the 1050 and 1054 Niagara Street parcels (NS-5) proximate to the former loading dock. A mini-excavator will be used to assess the underlying material and attempt to determine the lateral extents on the BCP Site. The goal of the supplemental assessment is to determine the extents of impacts and evaluate potential engineering restriction (e.g., inaccessibility, steep slopes, proximity to active rail lines and subgrade communication utilities). Waste characterization samples will be collected from the NS-4 and NS-5 area to allow for disposal facility review.

As requested by the Department, visual assessment of the western bank of the 1088 Niagara Street parcel will be completed to assess the surface cover material of the steep slope. Visual assessment will be completed when weather conditions allow for safe access to the western bank.

Analytical and Schedule

As requested by the Department, Tentatively Identified Compounds (TICs) will also be assessed by the laboratory for VOCs and SVOCs.

A revised project schedule is attached for your reference.

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

Sincerely,
TurnKey Environmental Restoration, LLC

Nathan Munley
Project Manager

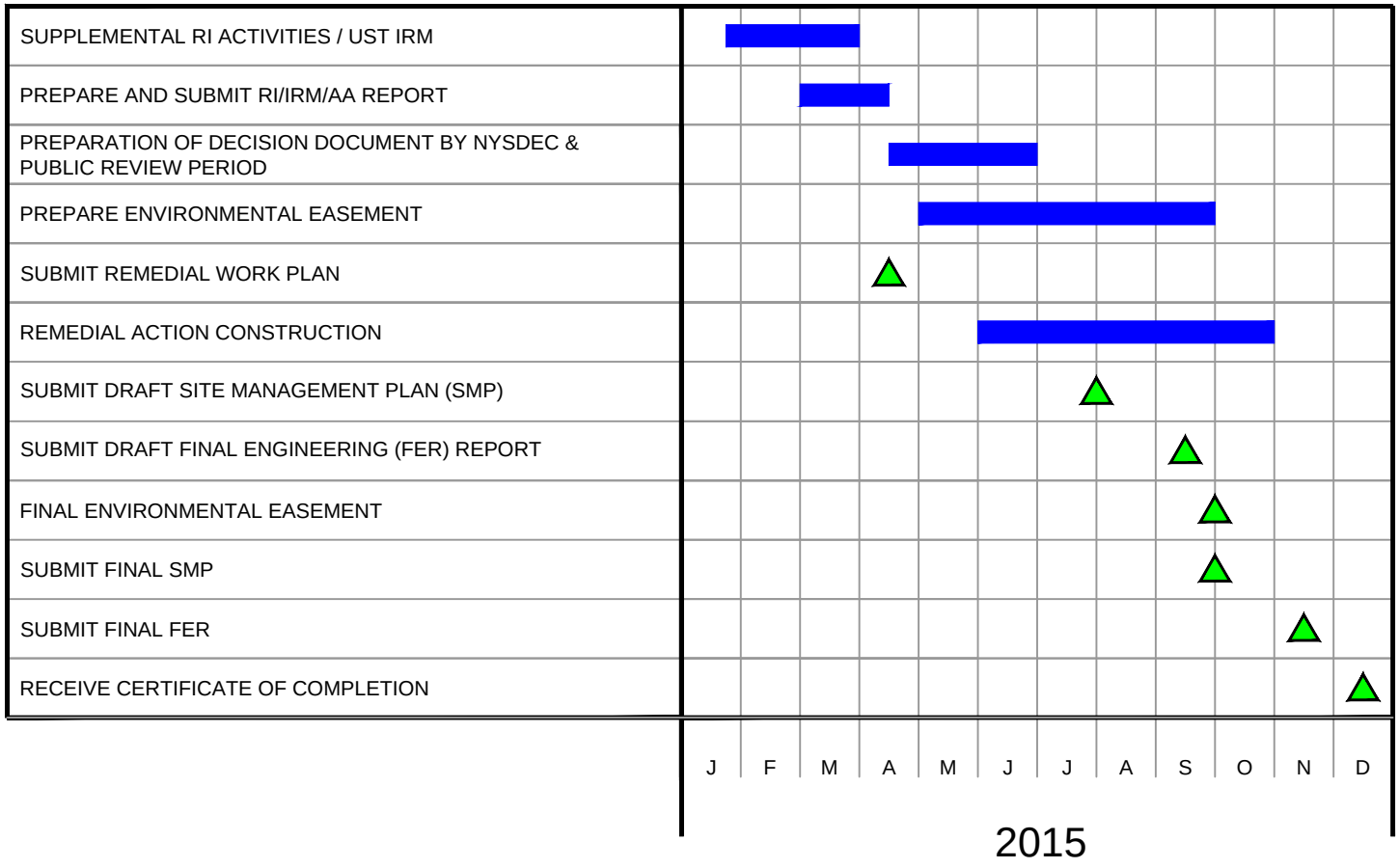
Michael Lesakowski
Sr. Project Manager

c: W. Paladino, 9271 Group, LLC
M. Doster, NYSDEC
N. Freeman, NYSDOH

File: 0136-013-005

TURNKEY

PROJECT TASKS:



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PROJECT NO.: 0136-013-005

DATE: REVISED JANUARY 2015

DRAFTED BY: NTM

PROJECT SCHEDULE

1050-1088 NIAGARA STREET SITE

BUFFALO, NEW YORK

PREPARED FOR

9271 GROUP, LLC

FIGURE 1