



Strong Advocates, Effective Solutions, Integrated Implementation

June 12, 2015

Mr. Eugene Melnyk
Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 9
270 Michigan Avenue
Buffalo, New York 14203-2999

**Re: Addendum to the RI-IRM-AA Work Plan
Additional Interim Remedial Measure (IRM)
1050-1088 Niagara Street Site (C915277)**

Dear Mr. Melnyk:

On behalf of 9271 Group, LLC, Benchmark Environmental Engineering and Science, PLLC (Benchmark) in association with TurnKey Environmental Restoration, LLC (TurnKey), has prepared this Addendum to the NYSDEC-approved Remedial Investigation/Interim Remedial Measures/Alternatives Analysis (RI/IRM/AA) Work Plan (revised May 2014).

As we discussed, 9271 Group, LLC has completed RI activities at the Site which identified an area of polychlorinated biphenyl (PCB) impacts in the vicinity of SB-17. Tables 4 and 5, and Figure 5 from the previously provided draft RI-AA Report are included for reference.

IRM EXCAVATION ACTIVITIES

In accordance with the NYSDEC DER-10, an additional IRM is planned to address the PCB impacted soil/fill to expeditiously mitigate health and environmental concerns. The additional IRM will be completed in accordance with the NYSDEC approved RI-IRM-AA Work Plan.

Details of additional planned remedial measures, including the soil vapor extraction (SVE) system and cover system, will be presented in a Remedial Action Work Plan (RAWP) that will be prepared and submitted to the Department after acceptance of the AA.

SB-17 Area

During the RI, elevated PCBs were identified in SB-17. In order to better define the extents of the impacts, delineation borings, identified as B-1 through B-4, were advanced to the north, south and west of SB-17 to assess the areal extents of PCB impacts. Based on the results, the PCB impact appear to be limited to SB-17, B-3 and B-4 at depths ranging from approximately 8 to 15 fbg (see Figure 5).

The upper 6-feet of overburden soil/fill will be removed and stockpiled on-Site in accordance with the work plan and characterized to determine potential off-site disposal and/or on-Site reuse as backfill.

As no elevated PID readings or visual evidence of impacts were observed during the RI, the extents of the excavation will continue until post-excitation sample results achieve 6NYCRR Part 375 Restricted Residential Use Soil Cleanup Objectives (RRSCOs), has reached practical extents including property boundary and presence of subgrade utilities along Niagara Street, and/or NYSDEC agrees that no further excavation is required.

OFF-SITE TRANSPORTATION AND DISPOSAL

Excavated impacted soil/fill will be transported off-site for disposal at a permitted commercial disposal facility by licensed haulers. Transportation and disposal documents will be included with the FER.

POST-EXCAVATION CONFIRMATION SAMPLING

Post excavation confirmatory samples will be collected from the excavation in accordance with the approved work plan and DER-10. Post-excitation samples will be collected from the SB-17 Area excavation for PCBs.

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.

EXCAVATION BACKFILL

Following NYSDEC concurrence that the remedial excavation is complete, the excavation will be backfilled with approved backfill material 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, in accordance with Part 375 Track 4 requirements.

COMMUNITY AIR MONITORING

In accordance with the approved work, included in the Health and Safety Plan (HASP), real-time community air monitoring will be performed during IRM activities at the Site 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).

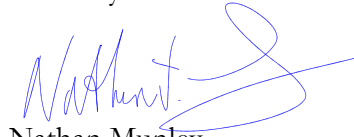
REPORTING

Full details and documentation of the IRM activities will be included in the Final Engineering Report (FER). At a minimum, the IRM section of the report will include:

- A map showing the lateral limits of excavation;
- 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;
- Planimetric map showing location of all verification and other sampling locations with sample identification labels/codes;
- Tabular comparison of verification and other sample analytical results to SCO's. An explanation shall be provided for any results exceeding acceptance criteria; and
- Text describing that the excavation activities were performed in accordance with this Work Plan.

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

Sincerely,
TurnKey Environmental Restoration, LLC



Nathan Munley
Project Manager



Michael Lesakowski
Sr. Project Manager

cc: B. Paladino (9271 Group, LLC)
F. Jacobi (9271 Group, LLC)
C. Staniszewski (NYSDEC)
C. Doroski (NYSDOH)

File: 0136-013-005

ATTACHMENTS



TABLE 4
SUMMARY OF REMEDIAL INVESTIGATION SUBSURFACE SOIL/FILL ANALYTICAL RESULTS

PARAMETER ¹	Unrestricted Use SCOs ³	Restricted Residential Use SCOs ³	Commercial Use SCOs ³	SAMPLE LOCATION (DEPTH)																				
				TP-11 (6-8)	TP-12 (10-16)	TP-13 (4-6)	TP-14 (2.5-4.5)	MW-3 (18-20)	MW-4 (2-4)	MW-4 (16-18)	MW-6 (2-4)	B-1 (MW-1) (8-10)	SB-09 ² (0.4-2)	SB-10 ² (0.4-2)	SB-11 ² (0.4-2)	SB-12 ² (12-14)	SB-13 (0.4-2)	SB-14 ² (11-12)	SB-15 (10-12)	SB-16 ² (4-6)	SB-17 (8-10)	SB-18 (14-16)	SB-19 (2-4)	SB-19 (9-10)
				07/31/2014				08/20/2014				08/19/2014		01/29/2015		08/27/2014			08/28/2014				08/19/2014	
Volatile Organic Compounds (VOCs) - mg/Kg ⁴																								
1,2,4-Trimethylbenzene	3.6	52	190	ND	--	8	--	--	--	0.97	--	ND	ND	--	--	24	--	ND	ND	--	--	ND	--	ND
1,3,5-Trimethylbenzene	8.4	52	190	ND	--	ND	--	--	--	ND	--	0.0027 J	ND	--	--	6.3	--	ND	ND	--	--	0.00045 J	--	ND
4-Isopropyltoluene	--	--	--	ND	--	ND	--	--	--	ND	--	0.0027 J	ND	--	--	2	--	ND	ND	--	--	0.00057 J	--	ND
Acetone	0.05	100	500	0.01 J	--	ND	--	--	--	ND	--	0.015 J	ND	--	--	ND	--	0.007 J	ND	--	--	ND	--	ND
Cyclohexane	--	--	--	ND	--	ND	--	--	--	0.39	--	0.029	ND	--	--	0.31 J	--	ND	1.2	--	--	ND	--	2.5
Ethylbenzene	1	41	390	ND	--	ND	--	--	--	ND	--	ND	ND	--	--	0.58	--	ND	ND	--	--	0.00063 B J	--	ND
Isopropylbenzene (Cumene)	--	--	--	ND	--	0.31	--	--	--	0.38	--	0.005 J	ND	--	--	0.55	--	ND	0.72	--	--	ND	--	1.1
Methylcyclohexane	--	--	--	ND	--	2.3	--	--	--	3.2	--	0.056	ND	--	--	3.1	--	ND	3.5	--	--	ND	--	13
n-Butylbenzene	12	--	--	ND	--	1.4	--	--	--	0.37	--	ND	ND	--	--	6.4	--	ND	ND	--	--	ND	--	0.82
n-Propylbenzene	3.9	100	500	ND	--	0.48	--	--	--	0.53	--	0.0059	ND	--	--	1.4	--	ND	0.96	--	--	ND	--	1.4
sec-Butylbenzene	11	100	500	ND	--	ND	--	--	--	0.38	--	ND	ND	--	--	1.1	--	ND	1.2	--	--	ND	--	0.66
tert-Butylbenzene	5.9	100	500	ND	--	0.13	--	--	--	0.047 J	--	ND	ND	--	--	ND	--	ND	ND	--	--	ND	--	0.047 J
trans-1,2-Dichloroethene	0.19	100	500	ND	--	ND	--	--	--	ND	--	ND	ND	--	--	ND	--	0.0007 J	ND	--	--	ND	--	ND
Total Xylenes	0.26	100	500	ND	--	ND	--	--	--	ND	--	ND	ND	--	--	4.8	--	ND	ND	--	--	0.0025 B J	--	ND
Total Tentatively Identified Compounds	--	--	--	ND	--	340.8	--	--	--	152.7	--	0.297	0.027	--	--	334	--	0.0371	1044	--	--	0.057	--	229.4
Semi-Volatile Organic Compounds (SVOCs) - mg/Kg ⁴																								
2-Methylnaphthalene	--	--	--	0.17 J	0.39	0.022 J	0.13	ND	0.024 J	--	ND	--	ND	ND	ND	1.1	ND	ND	ND	ND	ND	0.6 J	ND	--
3-Methylphenol/4-Methylphenol	--	--	--	0.41 J	ND	ND	ND	ND	ND	--	ND	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--
Acenaphthene	20	100	500	0.11 J	ND	ND	0.04 J	ND	0.043 J	--	ND	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.35 J	ND	--
Acenaphthylene	100	100	500	0.06 J	0.18 J	ND	ND	ND	0.0088 J	--	ND	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--
Anthracene	100	100	500	0.24 J	0.037 J	ND	0.062 J	ND	0.087	--	ND	--	ND	ND	ND	ND	ND	ND	ND	0.011 J	0.17 J	1 J	ND	--
Benzo(a)anthracene	1	1	5.6	0.38	0.1	ND	0.18	ND	0.32	--	ND	--	ND	ND	0.035 J	ND	ND	ND	ND	0.11	0.49	1.3 J	ND	--
Benzo(a)pyrene	1	1	1	0.26 J	0.085	ND	0.25	ND	0.31	--	ND	--	ND	ND	ND	ND	ND	ND	ND	0.32	0.38 J	1 J	ND	--
Benzo(b)fluoranthene	--	1	5.6	0.3 J	0.011	ND	0.27	ND	0.43	--	ND	--	ND	ND	ND	ND	ND	ND	0.32	0.41	0.71 J	ND	--	
Benzo(ghi)perylene	100	100	500	0.17 J	0.1	ND	0.25	ND	0.25	--	ND	--	ND	ND	ND	ND	ND	ND	0.43	ND	ND	ND	--	
Benzo(k)fluoranthene	0.8	3.9	56	0.14 J	0.043 J	ND	0.14	ND	0.098	--	ND	--	ND	ND	ND	ND	ND	ND	0.098	0.18 J	ND	ND	--	
Biphenyl	--	--	--	ND	0.054 J	ND	ND	ND	ND	--	ND	--	ND	ND	ND	0.16 J	ND	ND	ND	ND	ND	ND	--	
Bis(2-ethylhexyl) phthalate	--	--	--	ND	ND	ND	ND	ND	ND	--	ND	--	ND	ND	ND	ND	ND	0.14 J	ND	0.1 J	ND	3.6 J	ND	--
Butyl benzyl phthalate	--	--	--	0.51 J	ND	ND	ND	ND	ND	--	ND	--	ND	ND	0.055 J	ND	ND	ND	ND	ND	ND	ND	--	
Carbazole	--	--	--	ND	ND	ND	0.03 J	ND	0.061 J	--	ND	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	
Chrysene	1	3.9	56	0.31 J	0.11	ND	0.23	ND	0.36	--	ND	--	ND	ND	0.027 J	ND	ND	ND	ND	0.12	0.5	1.3	ND	--
Dibenzo(a,h)anthracene	0.33	0.33	0.56	ND	ND	ND	0.076 J	ND	0.069 J	--	ND	--	ND	ND	ND	ND	ND	ND	0.072 J	ND	ND	ND	--	
Fluoranthene	100	100	500	0.63	0.13	ND	0.34	0.028 J	0.7	--	ND	--	ND	ND	0.029 J	0.05 J	ND	ND	ND	0.085	1.1	2.7	ND	--
Fluorene	30	100	500	0.12 J	0.022 J	ND	0.033 J	ND	0.04 J	--	ND	--	ND	ND	ND	0.33	ND	ND	ND	ND	ND	0.93 J	ND	--
Indeno(1,2,3-cd)pyrene	0.5	0.5	5.6	0.13 J	0.071 J	ND	0.21	ND	0.21	--	ND	--	ND	ND	ND	ND	ND	ND	0.29	ND	ND	ND	--	
Naphthalene	12	100	500	0.14 J	0.39	ND	0.21	ND	0.025 J	--	ND	--	ND	ND	ND	0.15	ND	ND	ND	ND	ND	0.7 J	ND	--
Phenanthrene	100	100	500	0.76	0.25	ND	0.25	ND	0.52	--	ND	--	ND	ND	ND	0.71	ND	ND	ND	0.044 J	0.89	3.2	ND	--
Pyrene	100	100	500	0.62	0.15	ND	0.38	0.023 J	0.57	--	ND	--	ND	ND	0.025 J	0.07 J	ND	ND	ND	0.095	0.84	2.3	ND	--
Total PAHs	--	--	500	5.46 J	2.837 J	0.022 J	3.081 J	0.051 J	4.1258 J	--	ND	--	0 J	0 J	0.171 J	2.57 J	0 J	0.14 J	0 J	2.095 J	4.96 J	19.69 J	0 J	--
Total Tentatively Identified Compounds	--	--	--	ND	6.36	8.27	3.3	1.1	3.13	--	2.19	--	1.27	2.9	2.86	40	0.43	0.22	27.54	0.97	1.3	89.1	4.98	--
Metals - mg/Kg																								
Aluminum	--	--	--	9540	11100	11300	--	11700	12000	--	11700	--	--	10100	--	14500	2860	6450	9940	--	14000	--	6310	--
Arsenic	13	16	16	7	3.7	2.9	4.9	3.5	6.1	--	3.5	--	3.5	3.1	4.5	5.2	2.6	2.8	3.9	6.6	6.9	8.1	ND	--
Barium	350	400	400	139	285	68	170	91.9	104	--	81.4	--	75.7	69.9	108	124	13.8	53.1	57.4	135	139	74.6	61.3	--
Beryllium	7.2	72	590	0.69	0.95	0.86	--	0.77	0.68	--	0.73	--	--	0.49	--	0.69	ND	0.32	0.53	--	1.1	--	0.34	--
Cadmium	2.5	4.3	9.3	2	5	ND	2.4	0.6	0.29	--	0.34	--	ND	0.23	0.27	ND	ND	ND	0.24	0.82	0.5	27.8	0.22	--
Calcium	--	--	--	49200	30100	2750	--	53200	27600	--	4270	--	--	60700	--	20200	141000	32700	50300	--	40300	--	3740	--
Chromium	30	180	1500	282	29.6	14.8	29.9	13.1	15.4	--	15	--	14.7	12.4	15.9	17.4	5.4	8.5	13.3	15.9	27.4	110	8	--
Cobalt	--	--	--	5.4	2	8.6 J	--	7.4	9.2	--	10.4	--	--	7.4	--	9.2	2.6	5.1	6.6	--	10.8	--	4.3	--
Copper	50	270	270	57.7	57.9	9.1	--	17.7	24.4	--	14.3	--	--	17.8	--	18.8	11.5	11	17.9	--	50.1	--	13.6	--
Iron	--	--	--	43400	10300	17200	--	15600	17000	--	19900	--	--	13000	--	17700	6400	9970	13500	--	21900	--	10000	--
Lead	63	400	1000	208	1010	17.9	359	51.1	71.6	--	23.6	--	12.7	16.2	18.7	137	7.3	9.9	27.4	69.1	116	865	14.9	--
Magnesium	--	--	--	9470	15200	3390	--	22500	12000	--	2930	--	--	25500	--	9920	87800	13600	32500	--	9740	--	2310	--
Manganese	1600	2000	10000	3000	2570	349	--	571 B	448 B	--	1090 B	--	--	402 B	--	617	396	219	350	--	589 B	--	219 B	--
Mercury	0.18	0.81	2.8	0.28	0.34	0.023	0.085	0.13	0.05	--	0.069	--	ND	0.63	0.42	0.08	0.036	ND	0.073	0.22	0.04	0.17	0.2	--
Nickel	30	310	310	30.4	13.4	16.1	--	16.2	19.1	--	12.9	--	--	15.6	--	16.6	7.1	11.6	17.3	--	30.8	--	8	--
Potassium	--	--	--	794	841	1180	--	1420 B	1470 B	--	1040 B	--	--	2570 B	--	2210	966	1350	1640	--	1640 B	--	739 B	--
Selenium	3.9	180	1500	ND	ND	ND	ND	ND	ND	--	ND	--	ND	ND	ND	ND	ND	ND	ND	--	ND	ND	ND	--
Silver	2	180	1500	1.1	2.1	ND	0.81	ND	ND	--	ND	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.2	ND	--
Sodium	--	--	--	323	576	ND	--	185	ND	--	564	--	--	224	--	ND	ND	252	ND	--	244	--	ND	--
Vanadium	--	--	--	23	11.4	23.5	--	18.6	22.3	--	26.2	--	--	20.5	--	30.5	8.3	13.2	19.6	--	25	--	11.6	--
Zinc	109	10000	10000	323	935	50.4	--	103	85.3	--	82.3	--	--	58.3	--	79.3	34.2	44.8	61.6	--	141	--	69	--
Total PCBs - mg/Kg ⁴																								
Aroclor 1248	0.1	1	1	0.39	ND	ND	--	ND	--	--	ND	--	ND	ND	--	--	--	ND	ND	--	120	ND	--	--
Aroclor 1254	0.1	1	1	0.5	ND	ND	--	ND	--	--	0.15 J	--	ND	ND	--	--	--	ND	ND	--	ND	ND	--	--
Pesticides and Herbicides - mg/Kg ⁴																								
4,4'-DDD	0.0033	13	92	ND	ND	--	--	ND	--	--	ND	--	--	0.00038 J	--	--	--	--	ND	--	ND	--	--	--
4,4'-DDE	0.0033	8.9	62	0.017 J	ND	--	--	ND	--	--	ND	--	--	ND	--	--	--	--	ND	--	0.14 J	--	--	--
4,4'-DDT	0.0033	7.9	47	0.029 J	0.0094 J	--	--	ND	--	--	ND	--	--	ND	--	--	--	--	ND	--	0.13 J	--	--	--
delta-BHC	0.04	100	500	0.021 J	ND	--	--	ND	--	--	0.43 J	--	--	0.00056 J	--	--	--</							

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-detected.
2. Soil boring samples taken from inside existing building onsite.
3. Values per 61NYCRR Part 375 Soil Cleanup Objectives (SCOs).
4. 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. Or parameter not analysed for.
 J = Estimated value; result is less than the sample quantitation limit but greater than zero.

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



TABLE 5
SUMMARY OF PCB SUBSURFACE SOIL/FILL DELINEATION BORING ANALYTICAL RESULTS
1050-1088 NIAGARA STREET SITE
BUFFALO, NEW YORK

PARAMETER ¹	Unrestricted Use SCOs ²	Restricted Residential Use SCOs ²	Commercial Use SCOs ²	SAMPLE LOCATION (DEPTH)						
				SB-17 (8-10)	B-1 (8-10)	B-2 (8-10)	B-3 (8-10)	B-3 (10-12)	B-4 (8-10)	B-4 (10-12)
Total PCBs - mg/Kg ³										
Aroclor 1242	0.1	1	1	ND	ND	0.27 J	150	70	ND	ND
Aroclor 1248	0.1	1	1	120	ND	ND	ND	ND	ND	ND
Aroclor 1254	0.1	1	1	ND	0.15	0.34	ND	ND	2.2	ND
Aroclor 1260	0.1	1	1	ND	ND	ND	ND	ND	0.73 J	ND

Notes:

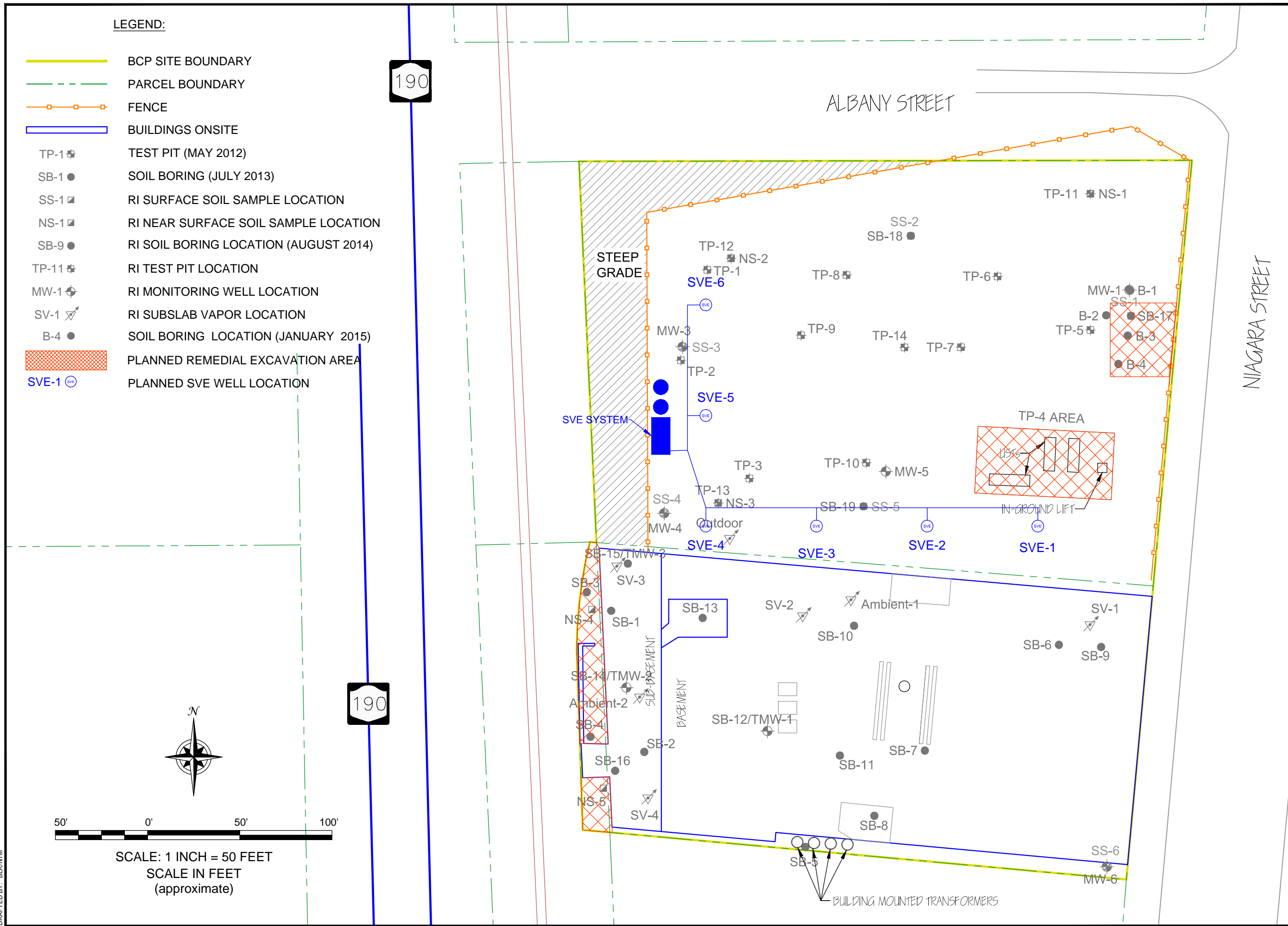
1. Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.
2. Values per 6NYCRR Part 375 Soil Cleanup Objectives (SCOs).
3. Sample results were reported by the laboratory in ug/kg and converted to mg/kg for comparisons to SCOs

Definitions:

ND = Parameter not detected above laboratory detection limit.
J = Estimated value; result is less than the sample quantitation limit but greater than zero.

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

DATE: MAY 2015
DRAFTED BY: BLR/NTM



PLANNED T4 RESTRICTED RESIDENTIAL USE CLEANUP

REMEDIAL INVESTIGATION/ALTERNATIVES ANALYSIS REPORT
1050-1088 NIAGARA STREET SITE
BUFFALO, NEW YORK
PREPARED FOR
9271 GROUP, LLC

FIGURE 5



2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

JOB NO.: 0136-013-005

DISCLAIMER: PROPERTY OF TURNKEY ENVIRONMENTAL RESTORATION, LLC. IMPORTANT: THIS DRAWING PRINT IS LOANED FOR MUTUAL ASSISTANCE AND AS SUCH IS SUBJECT TO RECALL AT ANY TIME. INFORMATION CONTAINED HEREON IS NOT TO BE DISCLOSED OR REPRODUCED IN ANY FORM FOR THE BENEFIT OF PARTIES OTHER THAN NECESSARY SUBCONTRACTORS & SUPPLIERS WITHOUT THE WRITTEN CONSENT OF TURNKEY ENVIRONMENTAL RESTORATION, LLC.