

Our ref: 11219347

18 April 2024

Mr. Eugene W. Melnyk, P.E  
New York State Department of Environmental Conservation  
Region 9  
700 Delaware Avenue  
Buffalo, NY 14209

Work Plan to Characterize Exposed Soil on Parcel 3, 1130 Niagara Street Site, NYSDEC Site No. C915284

Dear Mr. Melnyk:

## 1. Introduction

GHD Consulting Services Inc. (GHD) is submitting this scope of work for characterization of exposed soil at Parcel 3 of the 1130 Niagara Street Site (Site) on behalf of Jenesis Development LLC. GHD proposes sampling of surface soils within areas of exposed soil to determine the necessity of installing a cover system around the perimeter of Parcel 3 as identified in the NYSDEC Decision Document dated June 2021.

The cover system required by the Decision Document calls for a minimum of 1 foot of soil to be placed over areas of exposed soil where the upper 1 foot exceeds the applicable soil cleanup objectives (SCOs). Investigation activities for Parcel 3 completed prior to, and as part of the 2016 Remedial Investigation (RI), consisted of collection and analysis of subsurface soil samples from soil borings located within the limits of the asphalt paved parking lot. This sampling identified exceedances of the 6 NYCRR Part 375 Restricted Use SCOs for the Protection of Human Health – Commercial Use (RUSCO-C) criteria for benzo(a)pyrene (detections ranging from 1.5 – 3.1 mg/kg), arsenic (detection of 17.3 mg/kg), barium (detection of 3,230 mg/kg), and lead (detection of 3,880 mg/kg); however, no samples were collected from exposed soil on the side slopes of the property.

## 2. Scope of Work

### 2.1 Soil Sampling

In general accordance with NYSDEC DER-10, GHD proposes to collect samples at a rate of 1 sample for every 900 square feet of area. The sample frequency is outlined in Table 1 below.

**Table 1: Sample Frequency for Soil Areas on Parcel 3**

	Approximate Area (sq-ft)	Number of Samples	Sample Depth
Area 1	500	1 composite	0 – 1 foot
Area 2	1,700	2 grab	0 – 1 foot
Area 3	8,250	10 grab + 1 composite	0 – 1 foot
Area 4	650	1 composite	0 – 1 foot

GHD field staff will complete all surface soil sampling activities. Soil samples will be collected using a hand auger and/or hand shovel from each of the four exposed side slope areas at the approximate locations shown on Figure 1. Sampling location S-308 will be field adjusted to be collected from the area of erosion forming on the north face of Parcel 3. Composite samples will be generated from at least 2 discrete soil samples collected from the narrow strips of exposed soil in Areas 1 and 4, and the east side of Area 3 along Haggart Alley.

## 2.2 Laboratory Analysis

Soil samples will be collected in sample containers provided by the laboratory, properly packaged and cooled, and shipped to Eurofins TestAmerica Laboratories in Amherst, New York, under chain-of-custody protocols. The soil samples will be analyzed for polycyclic aromatic hydrocarbons (PAHs) and metals only via methods EPA 8270 and 6010/7471, respectively.

Upon completion of the laboratory analysis, all laboratory data will be validated by a GHD chemist.

## 3. Reporting

Data from the investigation of the exposed soil areas will be submitted to the NYSDEC in a brief summary report after completion of field activities. This information will be used to determine if the exposed soils on the side slopes of Parcel 3 require additional cover.

## 4. Proposed Schedule

GHD anticipates sampling to occur within 3 weeks of approval of this work plan, with submission of the brief data summary report to the NYSDEC within 6 weeks of the completion of field activities.

Please do not hesitate to contact me at (716) 362-8839 if you have any questions.

Regards,



**Katherine Galanti**

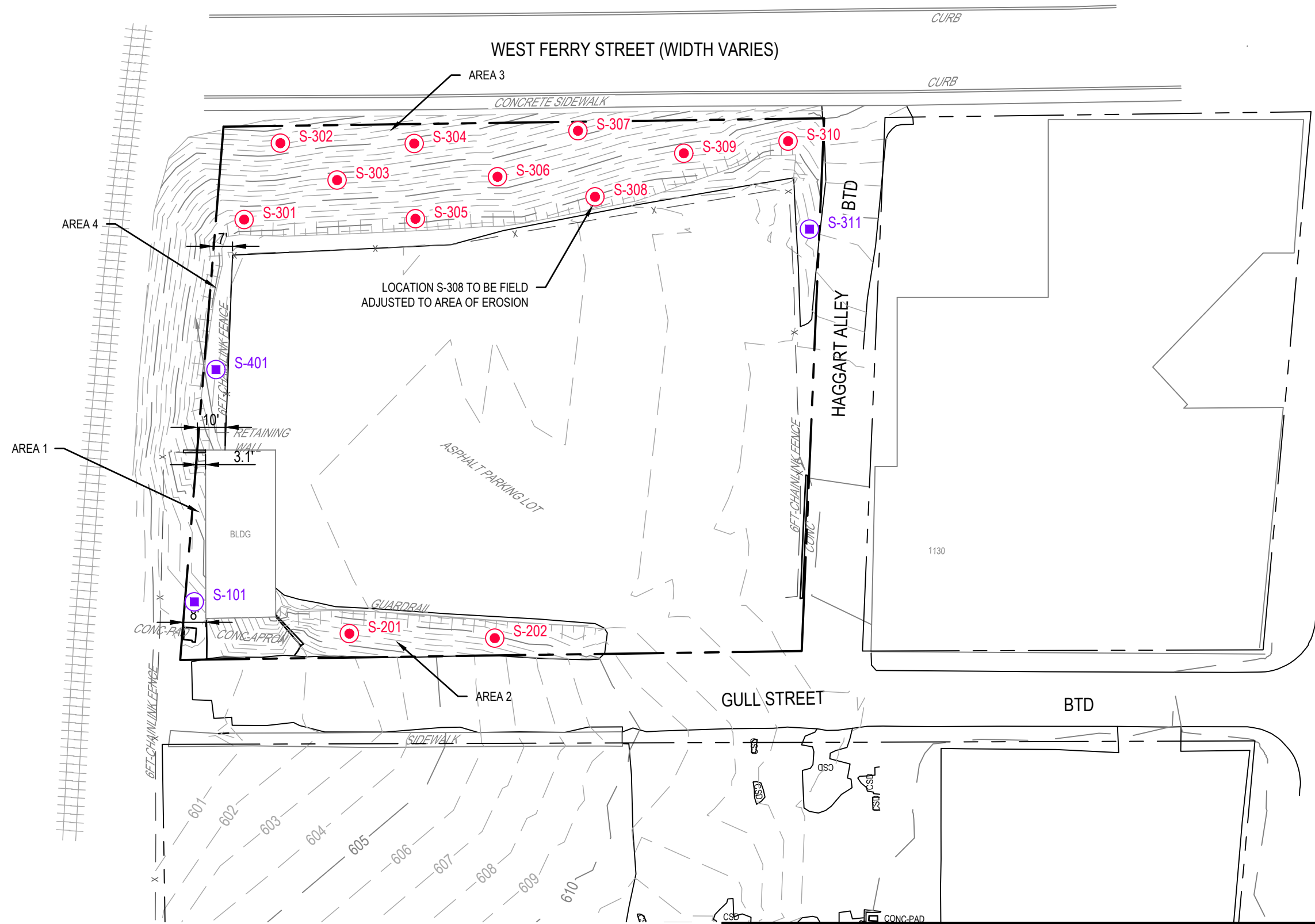
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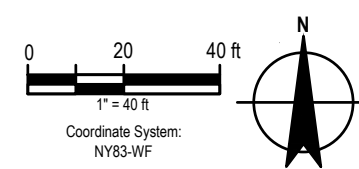
Attachment

Copy to: C. Martin, GHD  
D. Burgess, Jenesis



**LEGEND**

- PARCEL 3 BOUNDARY
- PROPOSED GRAB SAMPLING LOCATION
- PROPOSED COMPOSITE SAMPLE



BUFFALO, NEW YORK  
1180 NIAGARA STREET SITE - C915284  
PARCEL 3

APRIL 2024 PROPOSED  
SAMPLING LOCATIONS

Project No. 11219347  
Date April 2024

**FIGURE 1**