



**New York State Department of Environmental Conservation**

**Brownfield Cleanup Program**

**Citizen Participation Plan**  
for  
**240 Kensington Avenue**

240 Kensington Avenue  
City of Buffalo  
Erie, New York

June 2015

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**Note:** The information presented in this Citizen Participation Plan was current as of the date of its approval by the New York State Department of Environmental Conservation. Portions of this Citizen Participation Plan may be revised during the site’s investigation and cleanup process.

Applicant: **Development Unlimited of WNY, LLC (“Applicant”)**  
Site Name: **240 Kensington Avenue Site (“Site”)**  
Site Address: **240 Kensington Avenue**  
Site County: **Erie**  
Site Number: **C915295**

## **1. What is New York’s Brownfield Cleanup Program?**

New York’s Brownfield Cleanup Program (BCP) works with private developers to encourage the voluntary cleanup of contaminated properties known as “brownfields” so that they can be reused and developed. These uses include recreation, housing, and business.

A *brownfield* is any real property that is difficult to reuse or redevelop because of the presence or potential presence of contamination. A brownfield typically is a former industrial or commercial property where operations may have resulted in environmental contamination. A brownfield can pose environmental, legal, and financial burdens on a community. If a brownfield is not addressed, it can reduce property values in the area and affect economic development of nearby properties.

The BCP is administered by the New York State Department of Environmental Conservation (NYSDEC) which oversees Applicants that conduct brownfield site investigation and cleanup activities. An Applicant is a person who has requested to participate in the BCP and has been accepted by NYSDEC. The BCP contains investigation and cleanup requirements, ensuring that cleanups protect public health and the environment. When NYSDEC certifies that these requirements have been met, the property can be reused or redeveloped for the intended use.

For more information about the BCP, go online at: <http://www.dec.ny.gov/chemical/8450.html> .

## **2. Citizen Participation Activities**

### *Why NYSDEC Involves the Public and Why It Is Important*

NYSDEC involves the public to improve the process of investigating and cleaning up contaminated sites, and to enable citizens to participate more fully in decisions that affect their health, environment, and social well being. NYSDEC provides opportunities for citizen involvement and encourages early two-way communication with citizens before decision makers form or adopt final positions.

Involving citizens affected and interest in site investigation and cleanup programs is important for many reasons. These include:

- Promoting the development of timely, effective site investigation and cleanup programs that protect public health and the environment

- Improving public access to, and understanding of, issues and information related to a particular site and that site's investigation and cleanup process
- Providing citizens with early and continuing opportunities to participate in NYSDEC's site investigation and cleanup process
- Ensuring that NYSDEC makes site investigation and cleanup decisions that benefit from input that reflects the interests and perspectives found within the affected community
- Encouraging dialogue to promote the exchange of information among the affected/interested public, State agencies, and other interested parties that strengthens trust among the parties, increases understanding of site and community issues and concerns, and improves decision making.

This Citizen Participation (CP) Plan provides information about how NYSDEC will inform and involve the public during the investigation and cleanup of the site identified above. The public information and involvement program will be carried out with assistance, as appropriate, from the Applicant.

#### *Project Contacts*

Appendix A identifies NYSDEC project contact(s) to whom the public should address questions or request information about the site's investigation and cleanup program. The public's suggestions about this CP Plan and the CP program for the site are always welcome. Interested people are encouraged to share their ideas and suggestions with the project contacts at any time.

#### *Locations of Reports and Information*

The locations of the reports and information related to the site's investigation and cleanup program also are identified in Appendix A. These locations provide convenient access to important project documents for public review and comment. Some documents may be placed on the NYSDEC web site. If this occurs, NYSDEC will inform the public in fact sheets distributed about the site and by other means, as appropriate.

#### *Site Contact List*

Appendix B contains the site contact list. This list has been developed to keep the community informed about, and involved in, the site's investigation and cleanup process. The site contact list will be used periodically to distribute fact sheets that provide updates about the status of the project. These will include notifications of upcoming activities at the site (such as fieldwork), as well as availability of project documents and announcements about public comment periods. The site contact list includes, at a minimum:

- chief executive officer and planning board chairperson of each county, city, town and village in which the site is located;
- residents, owners, and occupants of the site and properties adjacent to the site;
- the public water supplier which services the area in which the site is located;
- any person who has requested to be placed on the site contact list;
- the administrator of any school or day care facility located on or near the site for purposes of posting and/or dissemination of information at the facility;
- location(s) of reports and information.

The site contact list will be reviewed periodically and updated as appropriate. Individuals and organizations will be added to the site contact list upon request. Such requests should be submitted to the NYSDEC project contact(s) identified in Appendix A. Other additions to the site contact list may be made at the discretion of the NYSDEC project manager, in consultation with other NYSDEC staff as appropriate.

### *CP Activities*

The table at the end of this section identifies the CP activities, at a minimum, that have been and will be conducted during the site's investigation and cleanup program. The flowchart in Appendix D shows how these CP activities integrate with the site investigation and cleanup process. The public is informed about these CP activities through fact sheets and notices distributed at significant points during the program. Elements of the investigation and cleanup process that match up with the CP activities are explained briefly in Section 5.

- **Notices and fact sheets** help the interested and affected public to understand contamination issues related to a site, and the nature and progress of efforts to investigate and clean up a site.
- **Public forums, comment periods and contact with project managers** provide opportunities for the public to contribute information, opinions and perspectives that have potential to influence decisions about a site's investigation and cleanup.

The public is encouraged to contact project staff at any time during the site's investigation and cleanup process with questions, comments, or requests for information.

This CP Plan may be revised due to changes in major issues of public concern identified in Section 3 or in the nature and scope of investigation and cleanup activities. Modifications may include additions to the site contact list and changes in planned citizen participation activities.

### *Technical Assistance Grant*

NYSDEC must determine if the site poses a significant threat to public health or the environment. This determination generally is made using information developed during the investigation of the site, as described in Section 5.

If the site is determined to be a significant threat, a qualifying community group may apply for a Technical Assistance Grant (TAG). The purpose of a TAG is to provide funds to the qualifying group to obtain independent technical assistance. This assistance helps the TAG recipient to interpret and understand existing environmental information about the nature and extent of contamination related to the site and the development/implementation of a remedy.

An eligible community group must certify that its membership represents the interests of the community affected by the site, and that its members' health, economic well-being or enjoyment of the environment may be affected by a release or threatened release of contamination at the site.

For more information about TAGs, go online at <http://www.dec.ny.gov/regulations/2590.html>

Note: The table identifying the citizen participation activities related to the site's investigation and cleanup program follows on the next page:

Citizen Participation Requirements (Activities)	Timing of CP Activity(ies)
<b>Application Process:</b>	
<ul style="list-style-type: none"> <li>• Prepare site contact list</li> <li>• Establish document repositories</li> </ul>	At time of preparation of application to participate in the BCP.
<ul style="list-style-type: none"> <li>• Publish notice in Environmental Notice Bulletin (ENB) announcing receipt of application and 30-day public comment period</li> <li>• Publish above ENB content in local newspaper</li> <li>• Mail above ENB content to site contact list</li> <li>• Conduct 30-day public comment period</li> </ul>	When NYSDEC determines that BCP application is complete. The 30-day public comment period begins on date of publication of notice in ENB. End date of public comment period is as stated in ENB notice. Therefore, ENB notice, newspaper notice, and notice to the site contact list should be provided to the public at the same time.
<b>After Execution of Brownfield Site Cleanup Agreement:</b>	
<ul style="list-style-type: none"> <li>• Prepare Citizen Participation (CP) Plan</li> </ul>	Before start of Remedial Investigation
<b>Before NYSDEC Approves Remedial Investigation (RI) Work Plan:</b>	
<ul style="list-style-type: none"> <li>• Distribute fact sheet to site contact list about proposed RI activities and announcing 30-day public comment period about draft RI Work Plan</li> <li>• Conduct 30-day public comment period</li> </ul>	Before NYSDEC approves RI Work Plan. If RI Work Plan is submitted with application, public comment periods will be combined and public notice will include fact sheet. Thirty-day public comment period begins/ends as per dates identified in fact sheet.
<b>After Applicant Completes Remedial Investigation:</b>	
<ul style="list-style-type: none"> <li>• Distribute fact sheet to site contact list that describes RI results</li> </ul>	Before NYSDEC approves RI Report
<b>Before NYSDEC Approves Remedial Work Plan (RWP):</b>	
<ul style="list-style-type: none"> <li>• Distribute fact sheet to site contact list about proposed RWP and announcing 45-day public comment period</li> <li>• Public meeting by NYSDEC about proposed RWP (if requested by affected community or at discretion of NYSDEC project manager)</li> <li>• Conduct 45-day public comment period</li> </ul>	Before NYSDEC approves RWP. Forty-five day public comment period begins/ends as per dates identified in fact sheet. Public meeting would be held within the 45-day public comment period.
<b>Before Applicant Starts Cleanup Action:</b>	
<ul style="list-style-type: none"> <li>• Distribute fact sheet to site contact list that describes upcoming cleanup action</li> </ul>	Before the start of cleanup action.
<b>After Applicant Completes Cleanup Action:</b>	
<ul style="list-style-type: none"> <li>• Distribute fact sheet to site contact list that announces that cleanup action has been completed and that summarizes the Final Engineering Report</li> <li>• Distribute fact sheet to site contact list announcing issuance of Certificate of Completion (COC)</li> </ul>	At the time NYSDEC approves Final Engineering Report. These two fact sheets are combined if possible if there is not a delay in issuing the COC.

### **3. Major Issues of Public Concern**

This section of the CP Plan identifies major issues of public concern that relate to the site. Additional major issues of public concern may be identified during the course of the site's investigation and cleanup process.

Development Unlimited of WNY, LLC intends to perform the required BCP Site investigation and remediation to create a property suitable for reuse as residential apartments. The project will result in the redevelopment and reuse of an environmentally impaired property into a productive, community-enhancing commercial facility. Construction activities will create temporary construction jobs and future redevelopment will create new permanent positions upon opening of the new facility. The RI Work Plan will be designed to assess the site soil/fill conditions, evaluate Site groundwater quality and evaluate other potential environmental conditions on the Site. Development Unlimited of WNY, LLC intends to remediate the Site to achieve restricted residential soil cleanup objectives.

### **4. Site Information**

Appendix C contains a map identifying the location of the site.

#### *Site Description*

The Site consists the southern portion (approximately 2.5 acres) of parcel, SBL: 89.16-1-5.1 that totals approximately 6.17 acres in size. It is located in a mixed-use industrial, commercial and residential area of the City of Buffalo, Erie County, New York. The Site is bound by Kensington Avenue to the south, Pauline Street, to the east, the northern portion of 240 Kensington Avenue (3.67 acres which is not subject to this BCP application) to the north, and the railroad right-of-way to the west. The majority of the properties to the north and east are residential.

#### *History of Site Use, Investigation, and Cleanup*

The Site was historically used for industrial purposes. The Site was the former location of the Hewitt-Robins foam rubber manufacturing facility. It was developed sometime between 1890s and 1920, with some expansion occurring. The City of Buffalo took ownership of the property in 1983; the Site buildings were fully demolished by 1989. The C&D waste from the building demolition may have been used on-site as fill material. The Site is currently vacant and owned by the City of Buffalo.

In addition to the industrial nature of the Site, previous investigation have indicated that chemicals and petroleum products were used on the Site. Sanborn maps indicate the presence of a Benzol Tank shed which was located in at least two (2) locations on the property due to expansion, gasoline tanks, a boiler house, a testing lab and a machine shop. The previous investigations have identified the presence of petroleum related VOCs (pVOCs) and petroleum related SVOCs (pSVOCs) in the soil. One "closed" spill (Spill No 9001921) is associated with

the property.

## **5. Investigation and Cleanup Process**

### *Application*

The Applicant has applied for and been accepted into New York's Brownfield Cleanup Program as a Volunteer. This means that the Applicant was not responsible for the disposal or discharge of the contaminants or whose ownership or operation of the site took place after the discharge or disposal of contaminants. The Volunteer must fully characterize the nature and extent of contamination onsite, and must conduct a "qualitative exposure assessment," a process that characterizes the actual or potential exposures of people, fish and wildlife to contaminants on the site and to contamination that has migrated from the site.

The Applicant in its Application proposes that the site will be used for residential purposes.

To achieve this goal, the Applicant will conduct investigation and cleanup activities at the site with oversight provided by NYSDEC. The Brownfield Cleanup Agreement executed by NYSDEC and the Applicant sets forth the responsibilities of each party in conducting these activities at the site.

### *Investigation*

The Applicant will conduct an investigation of the site officially called a "remedial investigation" (RI). This investigation will be performed with NYSDEC oversight. The Applicant must develop a remedial investigation workplan, which is subject to public comment.

The site investigation has several goals:

- 1) define the nature and extent of contamination in soil, surface water, groundwater and any other parts of the environment that may be affected;
- 2) identify the source(s) of the contamination;
- 3) assess the impact of the contamination on public health and the environment; and
- 4) provide information to support the development of a proposed remedy to address the contamination or the determination that cleanup is not necessary.

When the investigation is complete, the Applicant will prepare and submit a report that summarizes the results. This report also will recommend whether cleanup action is needed to address site-related contamination. The investigation report is subject to review and approval by NYSDEC.

NYSDEC will use the information in the investigation report to determine if the site poses a significant threat to public health or the environment. If the site is a "significant threat," it must be cleaned up using a remedy selected by NYSDEC from an analysis of alternatives prepared by the Applicant and approved by NYSDEC. If the site does not pose a significant threat, the

Applicant may select the remedy from the approved analysis of alternatives.

### *Remedy Selection*

When the investigation of the site has been determined to be complete, the project likely would proceed in one of two directions:

1. The Applicant may recommend in its investigation report that no action is necessary at the site. In this case, NYSDEC would make the investigation report available for public comment for 45 days. NYSDEC then would complete its review, make any necessary revisions, and, if appropriate, approve the investigation report. NYSDEC would then issue a “Certificate of Completion” (described below) to the Applicant.

or

2. The Applicant may recommend in its investigation report that action needs to be taken to address site contamination. After NYSDEC approves the investigation report, the Applicant may then develop a cleanup plan, officially called a “Remedial Work Plan”. The Remedial Work Plan describes the Applicant’s proposed remedy for addressing contamination related to the site.

When the Applicant submits a proposed Remedial Work Plan for approval, NYSDEC would announce the availability of the proposed plan for public review during a 45-day public comment period.

### *Cleanup Action*

NYSDEC will consider public comments, and revise the draft cleanup plan if necessary, before approving the proposed remedy. The New York State Department of Health (NYSDOH) must concur with the proposed remedy. After approval, the proposed remedy becomes the selected remedy.

The Applicant may then design and perform the cleanup action to address the site contamination. NYSDEC and NYSDOH oversee the activities. When the Applicant completes cleanup activities, it will prepare a final engineering report that certifies that cleanup requirements have been achieved or will be achieved within a specific time frame. NYSDEC will review the report to be certain that the cleanup is protective of public health and the environment for the intended use of the site.

### *Certificate of Completion*

When NYSDEC is satisfied that cleanup requirements have been achieved or will be achieved for the site, it will approve the final engineering report. NYSDEC then will issue a Certificate of Completion (COC) to the Applicant. The COC states that cleanup goals have been achieved, and relieves the Applicant from future liability for site-related contamination, subject to certain conditions. The Applicant would be eligible to redevelop the site after it receives a COC.

### *Site Management*

Site management is the last phase of the site cleanup program. This phase begins when the COC is issued. Site management may be conducted by the Applicant under NYSDEC oversight, if contamination will remain in place. Site management incorporates any institutional and engineering controls required to ensure that the remedy implemented for the site remains protective of public health and the environment. All significant activities are detailed in a Site Management Plan.

An institutional control is a non-physical restriction on use of the site, such as a deed restriction that would prevent or restrict certain uses of the property. An institutional control may be used when the cleanup action leaves some contamination that makes the site suitable for some, but not all uses.

An engineering control is a physical barrier or method to manage contamination. Examples include: caps, covers, barriers, fences, and treatment of water supplies.

Site management also may include the operation and maintenance of a component of the remedy, such as a system that is pumping and treating groundwater. Site management continues until NYSDEC determines that it is no longer needed.

## **Appendix -A**

### **Project Contacts and Locations of Reports and Information**

#### **Project Contacts**

For information about the site's investigation and cleanup program, the public may contact any of the following project staff:

#### **New York State Department of Environmental Conservation (NYSDEC):**

Mr. Antony Lopes Project Manager NYSDEC Region 9 Division of Environmental Remediation 270 Michigan Avenue Buffalo, NY 14203 (716) 851-7220	Citizen Participation Specialist NYSDEC Region 9 270 Michigan Avenue Buffalo, NY 14203 (716) 851-7220
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#### **New York State Department of Health (NYSDOH):**

Mr. Mark Sergott  
Project Manager  
NYSDOH  
Empire State Plaza – Corning Tower, Room 1787  
Albany, New York 12237  
Phone: (518) 402-7860  
Hours: M-F 8:30 AM – 4:45 PM

#### **Locations of Reports and Information**

The facilities identified below are being used to provide the public with convenient access to important project documents:

Buffalo & Erie County Public Library 1187 East Delevan Ave Buffalo, NY 14215 Attn: Ms. Gwen Collier, Director Hours: Sunday        Closed Mon – Tues: 12:00 PM – 7:30 PM Wednesday: Closed Thurs – Fri: 10:00 AM – 5:30 PM Saturday     9:00 AM – 4:30 PM	NYSDEC Region 9 270 Michigan Avenue Buffalo, NY 14203 Attn: Mr. Anthony Lopes Hours: 8:30 AM to 4:30 PM Monday through Friday Phone: (716) 851-7000 (call for appointment)
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Phone: (716) 896-4433

## **Appendix B - Site Contact List**

**Contact List Information**  
**240 Kensington Avenue Site**

**Erie County Contacts:**

Honorable Mark Poloncarz  
Erie County Executive  
95 Franklin Street  
Buffalo, NY 14202

Commissioner Maria R. Whyte  
Erie Co. Environment & Plan.  
95 Franklin Street  
Buffalo, NY 14202

Mr. Robert Graber  
Erie County Legislature Clerk  
25 Delaware Avenue  
Buffalo, NY 14202

Commissioner Gale Burstein  
Erie Co. Health Dept.  
95 Franklin Street, Room 931  
Buffalo, NY 14202

Mr. John J. LaFalce  
ECIDA  
143 Genesee Street  
Buffalo, NY 14203

Ms. Betty Jean Grant  
District 2 Erie County Legislator  
790 East Delavan Avenue  
Buffalo, NY 14215

Mr. Paul Kranz  
Erie Co. Environment & Plan.  
95 Franklin Street  
Buffalo, NY 14202

Mr. Christopher Pawenski  
Erie Co. Environment & Planning  
95 Franklin Street  
Buffalo, NY 14202

Commissioner Daniel Neaverth, Jr.  
Erie County Local Emergency  
45 Elm Street  
Buffalo, NY 14203

**City of Buffalo Contacts:**

Byron Brown, Mayor  
City of Buffalo  
65 Niagara Square  
Buffalo, NY 14219

James A. Morrell, Chairman  
City of Buffalo  
Planning Board  
901 City Hall  
Buffalo, NY 14219

Councilman Joseph Golombek, Jr.  
North District Common Council  
1502 City Hall  
Buffalo, NY 14202

**Contact List Information**  
**240 Kensington Avenue Site**

**Supplier of Potable Water:**

Buffalo Water Authority  
281 Exchange Street  
Buffalo, NY 14204

**Local News Media:**

Buffalo News  
ATTN: Ms. Aaron Besecker  
1 News Plaza  
Buffalo, NY 14240

WGRZ TV - Ch. 2  
ATTN: Ms. Maria Sisti  
259 Delaware Avenue  
Buffalo, NY 14202

WIVB - Ch. 4  
ATTN: Ms. Lisa Fullone  
2077 Elmwood Avenue  
Buffalo, NY 14207

WKBW News Channel 7  
ATTN: Ms. Melanie Pritchard  
7 Broadcast Plaza  
Buffalo, NY 14202

Alternate Press  
ATTN: Mr. Joe Schmidbauer  
P.O. Box 729, Washington Station  
Buffalo, NY 14205

Business First  
ATTN: Anne Marie Franczyk  
465 Main Street  
Buffalo, NY 14203-1793

WBEN News Radio 930  
Entercom Radio of Buffalo  
500 Corporate Pkwy, Ste 200  
Buffalo, NY 14226

WNED, Environmental News Desk  
ATTN: Mr. Michael Desmond  
P.O. Box 1263, Horizons Plaza  
Buffalo, NY 14240

**Nearby Schools:**

Brian Wiesinger, Principal  
Burgard Vocational High School  
400 Kensington Avenue  
Buffalo, NY 14214

Timothy Kelly, Superintendent  
St. Mary's School For The Deaf  
2253 Main St.  
Buffalo, NY 14214

H. Geneive Jones-Johnson, Principal  
Dr. George Blackman Ecc  
2358 Main Street  
Buffalo, NY 14214

Mr. Vitale, Principal  
Ps 42 Occupational Training Center  
2495 Main Street  
Buffalo, NY 14214-2154

**Contact List Information**  
**240 Kensington Avenue Site**

**Other Interested Parties:**

Ms. Judy Robinson  
Citizens Env. Coalition  
543 Franklin Street Suite 2  
Buffalo, NY 14202-1109

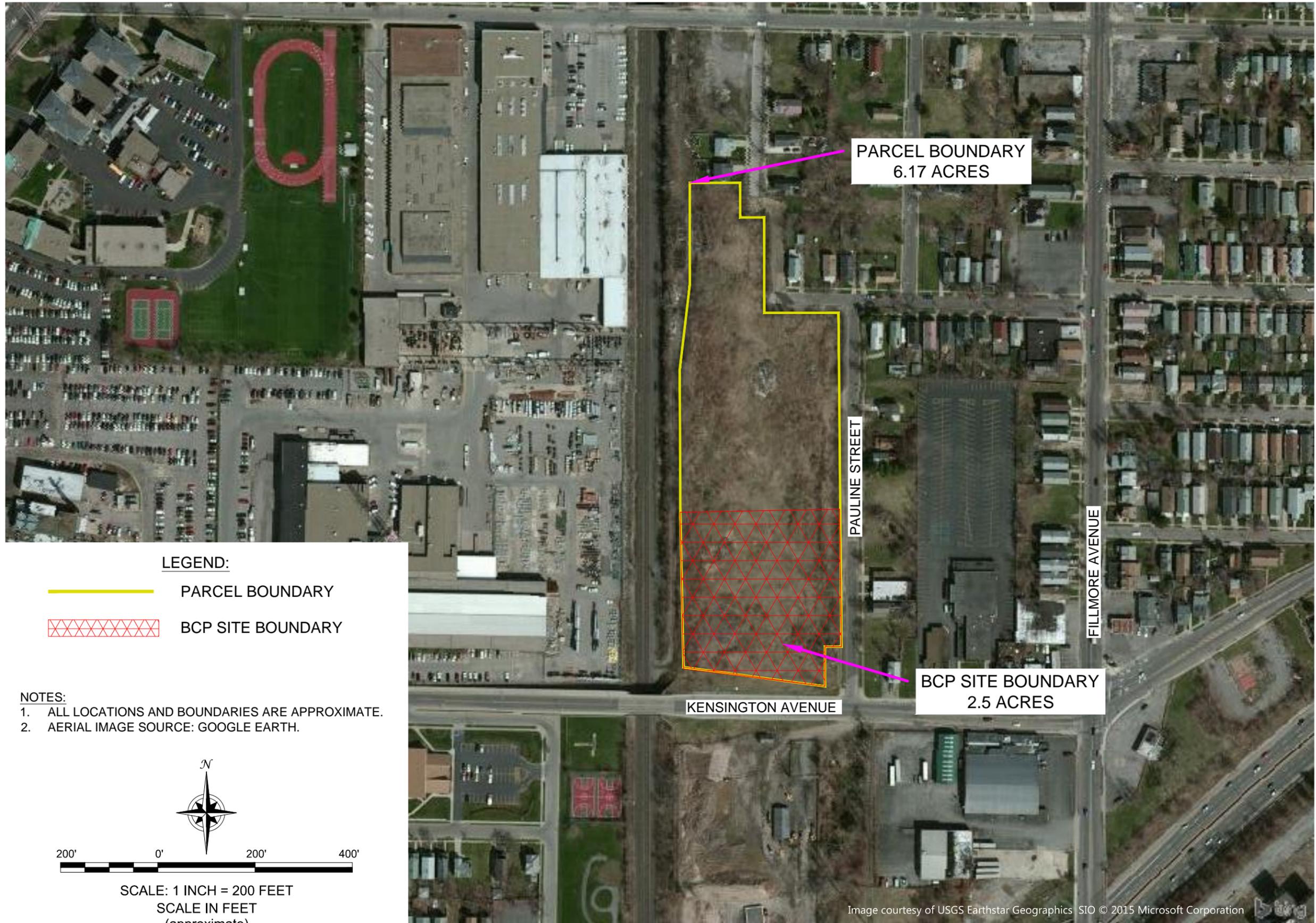
**Document Repository:**

Ms. Gwen Collier, Director  
Buffalo & Erie County Public Library  
East Delavan Branch  
Buffalo, NY 14215

**Contact List Information; Adjacent Property Owners List  
240 Kensington Avenue Site**

Adjacent Property Address				Property Owner Mailing Address
No.	Street	Property Type	Property Use	
270	Kensington Ave	Commercial	Vacant	65 Niagara Square Buffalo, NY 14202
276	Kensington Ave	Residential	Vacant Land	Eternal Hope Church of God In Christ 505 Pleasantview Drive Lancaster, NY 14086
11	Pauline St	Residential	Vacant Land	Eternal Hope Church of God In Christ 19 Pauline Street Buffalo, NY 14214
13	Pauline St	Residential	Vacant Land	Perfecting Title 65 Niagara Square Buffalo, NY 14202
17	Pauline St	Residential	2 Family	Michael A Hunter 17 Pauline Street Buffalo, NY 14214
19	Pauline St	Commercial	Religious	Eternal Hope Church of God In Christ 19 Pauline Street Buffalo, NY 14214
27	Pauline St	Residential	Vacant Land	Eternal Hope Church of God In Christ 19 Pauline Street Buffalo, NY 14214
48	Pauline St	Commercial	Gas Measure Station	Nation Fuel Gas District 6363 Main Street Williamsville, NY 14221
33	Pauline St	Residential	Vacant Land	City Buffalo Perfecting Title 65 Niagara Square Buffalo, NY 14202
35	Pauline St	Residential	Vacant Land	City Buffalo Perfecting Title 65 Niagara Square Buffalo, NY 14202
37	Pauline St	Residential	Vacant Industrial	City Buffalo Perfecting Title 65 Niagara Square Buffalo, NY 14202
240	Kensington Ave	Commercial	Vacant Land	City of Buffalo Perfecting Title 323 City Hall Buffalo, NY 14202
0	Kensington Ave	Railroad	Railroad	
239	Kensington Ave	Commercial	Manufacture	239-41 Kensington Avenue LLC 2939 Lockport Rd Niagara Falls, NY 14305
243	Kensington Ave	Commercial	Vacant	City Buffalo Perfecting 65 Niagara Square Buffalo, NY 14202
144	Kensington Ave	Light Industrial	Utility	National Grid 144 Kensington Ave Buffalo, NY 14214

## **Appendix C - Site Location Map**



DATE: MARCH 2015  
DRAFTED BY: RFL

### SITE PLAN

BROWNFIELD CLEANUP PROGRAM APPLICATION  
 240 KENSINGTON AVENUE SITE  
 BUFFALO, NEW YORK  
 PREPARED FOR  
 DEVELOPMENT UNLIMITED OF WNY, LLC

**BENCHMARK**  
 ENVIRONMENTAL  
 ENGINEERING &  
 SCIENCE, PLLC

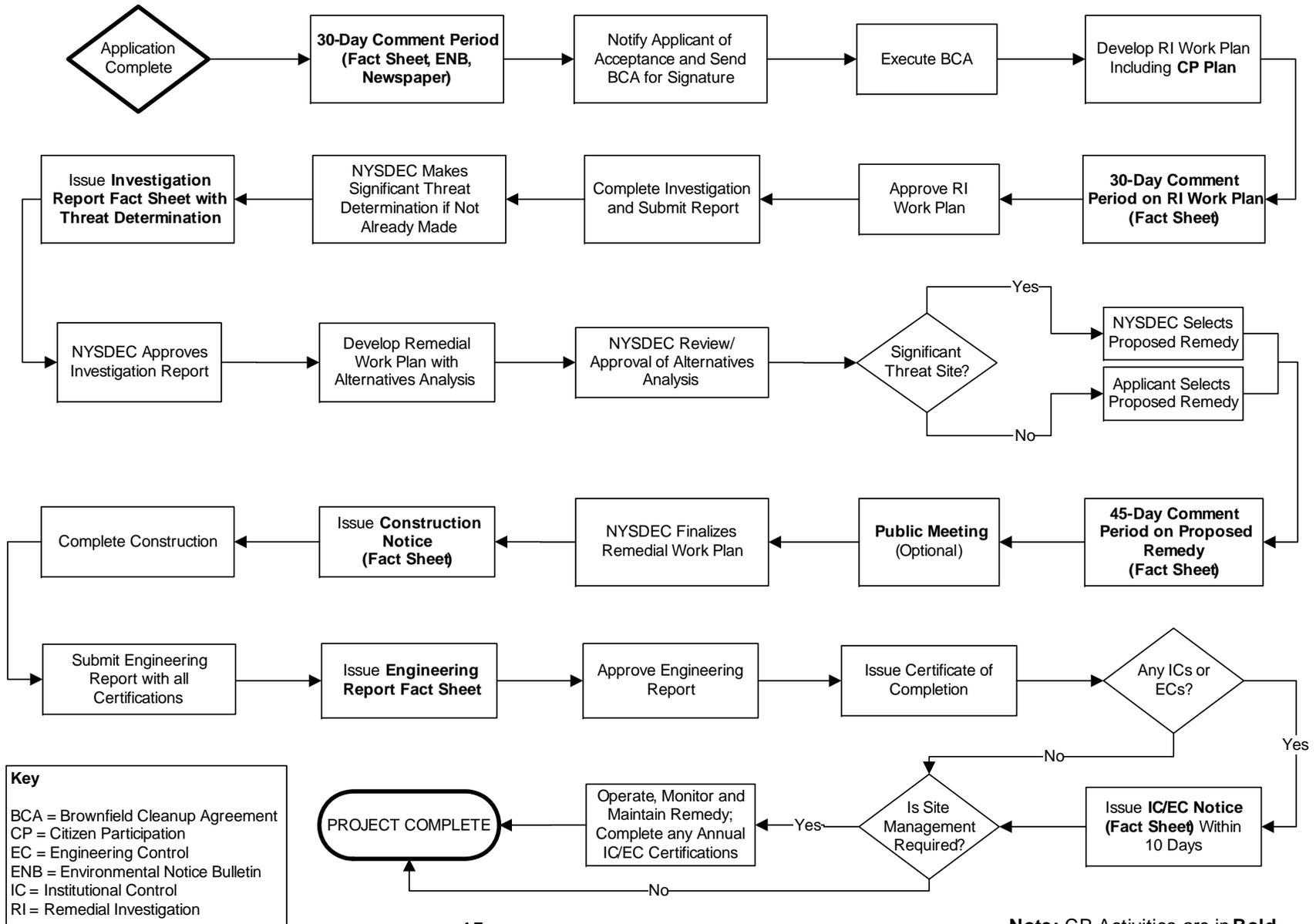
2558 HAMBURG TURNPIKE  
 SUITE 300  
 BUFFALO, NY 14218  
 (716) 856-0599

JOB NO.: 0335-015-001

## FIGURE 2

DISCLAIMER: PROPERTY OF BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC. 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 BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC.

## Appendix D– Brownfield Cleanup Program Process



**Key**  
 BCA = Brownfield Cleanup Agreement  
 CP = Citizen Participation  
 EC = Engineering Control  
 ENB = Environmental Notice Bulletin  
 IC = Institutional Control  
 RI = Remedial Investigation