

March 14, 2019

Mr. Andrew Zwack
Project Manager
New York State Department of Environmental Conservation
Department of Environmental Remediation, Region 9
270 Michigan Avenue
Buffalo NY 14203-2915

**Re: UST Removal Work Plan
Main and Hertel Site #C915318**

Dear Mr. Zwack:

On behalf of our client, Main and Hertel LLC, Benchmark Environmental Engineering & Science, PLLC, in association with TurnKey Environmental Restoration, LLC (collectively, Benchmark-TurnKey), has prepared this work plan to present the proposed scope of work to remove six (6) underground storage tanks (USTs) that were discovered during the Building 3 demolition activities (see Figure 1) and any subsequent USTs encountered during redevelopment activities at the Main and Hertel Brownfield Cleanup Program (BCP) Site.

Background

In accordance with the New York State Department of Environmental Conservation (NYSDEC) approved Interim Remedial Measures (IRM) Work Plan¹, Building 3 is currently undergoing demolition. The concrete slab of the former transformer area was removed on February 22, 2019. On February 26, 2019, after the area was cleared for asbestos-contained materials (ACMs), Benchmark-TurnKey accessed the area to complete PCB soil sampling underneath the slab. During sampling activities, a 2-inch diameter fill port was observed in the northern corner of the removed slab area. It is determined that the fill port was associated with an abandoned UST. The diameter of the UST was measured on February 27, 2019 by inserting a measuring tape into the 2-inch fill port to estimate the diameter of the tank and assess if contents were present. The UST measured approximately 4-feet in diameter with an estimated 22-inches of water. The orientation of the tank could not be confirmed but is estimated to be in a north/south direction. A photoionization detector (PID) was inserted into the 2-inch fill port and a reading of 30 parts per million (ppm) was measured. No odors were noted.

¹ Interim Remedial Measures Work Plan, Main and Hertel Site, Buffalo, New York (Site No. C915318). Prepared for Main and Hertel LLC. Prepared by Benchmark Environmental Engineering and Science, PLLC. Revised November 2018.

Strong Advocates, Effective Solutions, Integrated Implementation

www.benchmarkturnkey.com

2558 Hamburg Turnpike, Suite 300 | Buffalo, NY 14218
phone: (716) 856-0599 | fax: (716) 856-0583

On March 13 and 14, 2019, during the removal of subsurface foundation walls, five (5) additional USTs similar to the one observed on February 27th, were observed in the general area of the former transformer area.

Benchmark-TurnKey proposes to complete the following scope of work to address the USTs.

UST Contents Waste Characterization & Disposal

The contents of the USTs will be sampled in accordance with the disposal facilities requirements. The tanks will also be uncovered to further assess size, orientation, and condition.

Pending the project schedule and the timing of the receipt of the waste characterization sample analysis, the contents of the USTs will either be transferred into appropriate totes for temporary storage or will be removed from the USTs directly into a vac truck for transportation off-site for disposal. The content of the tanks will be managed according to federal, state, and local regulations.

UST Removal & Disposal

Once the liquid contents of the USTs are removed, the USTs will be removed from the ground and staged on polyethylene sheeting. The USTs will be opened, inspected, and the residual contents removed, and the interior cleaned and containerized. The residual tank contents will be properly disposed. If piping and/or ancillary equipment associated with the UST are encountered, it will also be removed.

Once the UST has been cleaned it will be transported off-site for recycling or landfill disposal.

NYSDEC will be notified in advance of the UST removal activities and given the opportunity to observe the removal. The UST excavation will not be backfilled until NYSDEC has observed the condition of the UST area.

Removal of Impacted Soils

Following removal of the UST, the soil/fill adjacent to the UST will be assessed for visual/olfactory evidence of impacts and scanned with a PID. If impacted soil/fill is present it will be excavated and staged on polyethylene sheeting and appropriate waste characterization samples collected per the requirements of the disposal facility.

Excavation activities will be directed by an experienced Benchmark-TurnKey professional. PID screening and visual/olfactory observations will be used to screen the soil/fill and assist in verifying removal of impacts. Lateral and vertical excavation will continue, as described above, until the impacted soil/fill are removed. Should evidence of a release to bedrock and/or groundwater be identified after the removal of the UST and impacted soil/fill, if any, additional investigation activities will be discussed with the Department to assess potential impacts.

Excavation Confirmation Sampling

Post excavation confirmatory samples will be collected from the excavation sidewalls and bottom of excavation, with bias toward material exhibiting evidence of visual and olfactory contamination, if remaining. Post-excavation confirmatory samples will be collected in accordance with DER-10. A minimum of one (1) sample per 30 linear feet of sidewall and one (1) sample for each 900 square feet of excavation bottom will be collected. If the excavation is completed to top of bedrock, no bottom samples will be collected.

Samples from the excavations will be analyzed for Target Compound List (TCL) volatile organic compounds and CP-51 list SVOCs. If PCBs or RCRA 8 metals are identified in waste characterization samples association with UST contents, Benchmark will provide the results with the Department to discuss if additional post-excavation parameters are needed. Analysis will be completed in accordance with USEPA SW-846 Methodology with an equivalent Category B deliverable 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.

The soil/fill sample results will be summarized and provided to the Department prior to backfilling the excavation. The goal of the post-excavation sampling will be to achieve the Part 375 Restricted-Residential Soil Cleanup Objectives.

Reporting

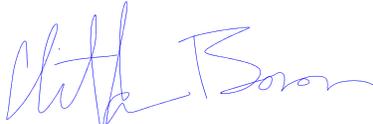
A UST Closure Report will be prepared to document the USTs and impacted soil/fill removal (if any), provide disposal documentation, photographic documentation of the USTs and any associated piping/equipment (and its condition), and the results of the post-excavation confirmatory sampling activities. A figure will be provided to identify the location of the USTs and associated post-excavation sample locations.

A NYSDEC Petroleum Bulk Storage Division application will be completed and submitted to the Division of Environmental Remediation Bulk Storage Unit that will identify the USTs and their subsequent closure.

The Department will be notified in advance of work related to the closure of the USTs.

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

Sincerely,
Benchmark Environmental Engineering & Science, PLLC

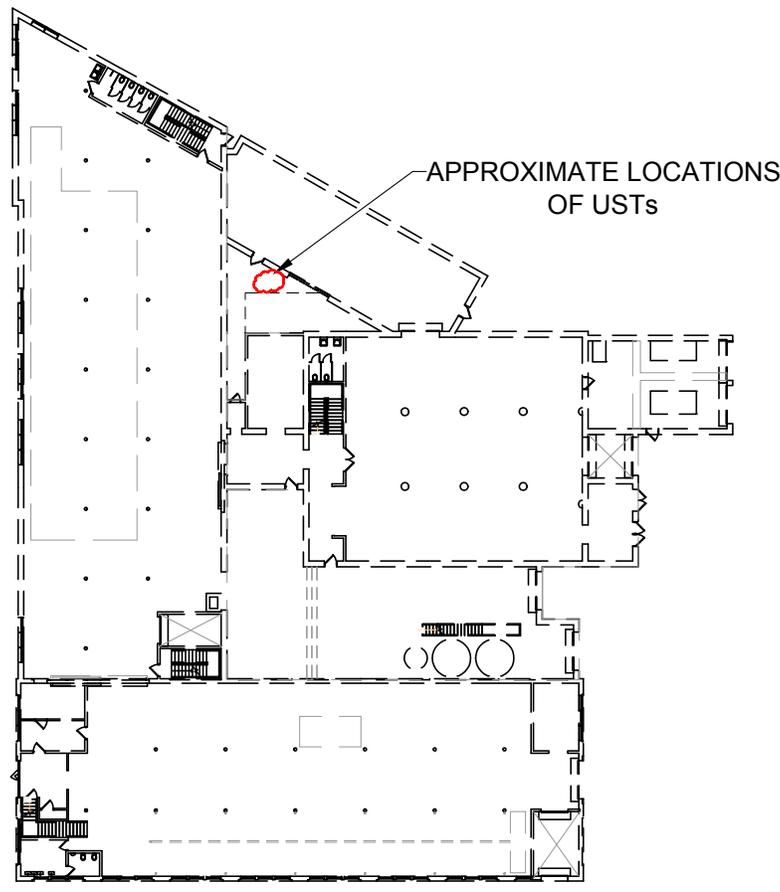


Christopher Boron
Senior Project Manager

Attachments: Figure 1

cc: David Freeman (Main and Hertel LLC)
Justin Earl (Main and Hertel LLC)
Jeff Sellers (Metzger Inc.)
Marc Romanowski (Hopkins, Sorgi & Romanowski)

FIGURE 1



SCALE: 1 INCH = 50 FEET
 SCALE IN FEET
 (approximate)



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

PROJECT NO.: 0463-018-001
 DATE: MARCH 14, 2019
 DRAFTED BY: CMC/RFL

APPROXIMATE UST LOCATION

UST INVESTIGATION AND REMOVAL WORK PLAN

MAIN AND HERTEL
 BCP SITE NO. C915318
 BUFFALO, NEW YORK
 PREPARED FOR
 MAIN AND HERTEL LLC

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