August 16, 2023

Mr. Michael Keller
Project Manager, DER
NYSDEC Region 9
700 Delaware Avenue
Buffalo, New York 14209
michael.keller@dec.ny.gov

Re: Remedial Investigation Work Plan Addendum for
25 Rano Street Site (C915323)
Buffalo, New York

Dear Mr. Keller:

Roux Environmental Engineering and Geology, D.P.C. ("Roux") has prepared this Remedial Investigation Work Plan (RIWP) Addendum, on behalf of our client 25 Rano LLC to include Emergent Contaminant in the soil/fill investigation to be completed at the Site.

Tables 2 and 3 of the NYSDEC-approved Remedial Investigation Work Plan[1] have been revised in red and attached to this letter to include 1,4-dioxane and per- and polyfluoroalkyl substances (PFAS) analysis in soil. Emergent Contaminant sampling was previously completed on groundwater samples previously collected as part of the Remedial Investigation.

25 Rano LLC is proposing to analyze two (2) surface soil samples, three (3) test pits samples, five (5) exterior soil boring samples, and one (1) interior soil boring samples (for a total of eleven (11) samples plus appropriate QA/QC). The proposed locations of the Emergent Contaminant samples are shown on attached Figure 4 from the RIWP.

Table 3 has been revised to include sample methodology, container type, sample volume, preservation and holding time for the Emergent Contaminants.

The 25 Rano Street Site project schedule, previously submitted to NYSDEC with the Brownfield Cleanup Agreement addendum to include 25 Rano Street LLC as an entity on the BCA is also attached. The addendum was executed by NYSDEC on June 6, 2023.

Please contact me by telephone at 716-856-0599 or by email at cboron@rouxinc.com if you have any questions or require additional information.

Sincerely,

ROUX ENVIRONMENTAL ENGINEERING AND GEOLOGY, D.P.C.

Christopher Boron, P.G.
Principal Geologist

Enclosures

[1] "Remedial Investigation Work Plan, 25 Rano Street, BCP Site No. C915323, Buffalo, New York". Dated March 2018.

TABLE 2
SAMPLING AND ANALYSIS PLAN

25 RANO STREET SITE
BUFFALO, NEW YORK

Location	Number of Planned Locations	Matrix	Parameter [1]						
			TCL VOCs (+TICs)	TCL SVOCs (+TICs)	TAL Metals (+cyanide)	PCBs	Herbicides	Pesticides	PFOA/PFOS 1,4-Dioxane [2]
Soil/Fill									
Surface (0-2") [3]	**13**	Soil/Fill	--	13	13	6	6	6	2
Near-Surface (1-2')	**31**	Soil/Fill	--	--	--	--	--	--	--
Test Pits (exterior)	10	Soil/Fill	10	10	10	5	5	5	3
Soil Borings (exterior) [4]	3	Soil/Fill	3	3	3	1	1	1	5
Soil Borings (interior)	13	Soil/Fill	13	13	13	6	6	6	1
Soil Borings (MWs)	5	Soil/Fill	5	5	5	2	2	2	--
Sub-Surface	**31**	Soil/Fill	--	--	--	--	--	--	--
Test Pits (exterior)	10	Soil/Fill	10	10	10	3	3	3	--
Soil Borings (exterior) [4]	3	Soil/Fill	3	3	3	1	1	1	--
Soil Borings (interior)	13	Soil/Fill	13	13	13	4	4	4	--
Soil Borings (MWs)	5	Soil/Fill	5	5	5	1	1	1	--
Subtotal Soil/Fill	***137***		***62***	***75***	***75***	***29***	***29***	***29***	***11***
Blind Duplicate [5]	--	*Soil/Fill*	*4*	*4*	*4*	*2*	*2*	*2*	1
MS [5]	--	*Soil/Fill*	*4*	*4*	*4*	*2*	*2*	*2*	1
MSD [5]	--	*Soil/Fill*	*4*	*4*	*4*	*2*	*2*	*2*	1
Soil/Fill Subtotal			**74**	**87**	**87**	**35**	**35**	**35**	**14**
Soil Vapor									
Soil Vapor	2	Soil Vapor	2	--	--	--	--	--	--
Outdoor Air	1	Ambient Air	1	--	--	--	--	--	--
Soil Vapor Subtotal			**3**	**0**	**0**	**0**	**0**	**0**	**0**
Groundwater [6]									
Monitoring Well	**5**	Groundwater	5	5	5	5	5	5	3
Blind Duplicate [5]	--	*Groundwater*	*1*	*1*	*1*	*1*	*1*	*1*	--
Equipment Blank	--	*Groundwater*	*0*	*0*	*0*	*0*	*0*	*0*	1
MS [5]	--	*Groundwater*	*1*	*1*	*1*	*1*	*1*	*1*	1
MSD [5]	--	*Groundwater*	*1*	*1*	*1*	*1*	*1*	*1*	1
Trip Blank [7]	--	*Water*	*1*	--	--	--	--	--	--
Groundwater Subtotal			**9**	**8**	**8**	**8**	**8**	**8**	**6**

Notes:

1. Analyses will be performed via USEPA SW-846 methodology with equivalent Category B deliverables package.
2. NYSDEC requirement for PFAS via Draft Method 1633 and low level 1,4-dioxane via Method 8270 SIM.
3. Surface samples to be collected from exterior (not beneath concrete slabs) test pits and soil boring locations only.
4. Soil borings planned on southern corner of property to preservce heavily vegetated area.
5. Blind duplicate and MS/MSD samples will be collected at a frequency of 1 per 20 samples/media collected.
6. Groundwater samples will be filtered in the laboratory for dissolved metals analysis.
7. Trip blanks will be submitted to the laboratory each day aqueous volatile organic samples are collected.

TABLE 3
SAMPLE CONTAINER, VOLUME, PRESERVATION & HOLDING TIME REQUIREMENTS

25 RANO STREET SITE
BUFFALO, NEW YORK

Matrix	Parameter [1]	Method [2]	Container Type	Minimum Volume	Preservation	Holding Time from Sample Date
Soil/Fill	TCL VOCs (+TICs)	5035/8260B	En Core Sampler	(3) 5 gram samples	Cool to 2-4°C Zero Headspace	48 hours extraction/14 days
	TCL SVOCs (+TICs) and 1,4-dioxane	8270C	WMG	4 oz.	Cool to 2-4°C	14 days extract/40 days
	TAL Metals	6010B	WMG	4 oz.	Cool to 2-4°C	6 months/Hg 28 days
	Pesticides	8081	WMG	8 oz.	Cool to 2-4°C	14 days extract/40 days
	Herbicides	8151	WMG	8 oz.	Cool to 2-4°C	14 days extract/40 days
	PCBs	8082	WMG	8 oz.	Cool to 2-4°C	14 days extract/40 days
	PFAS	1633	HDPE/Polypropylene	4 oz.	Cool to 2-4 °C	14 days extrac./40 days
Soil Vapor [3]	VOCs	TO-15	Stainless steel canister	6 L	Initially evacuated	30 days
Groundwater	TCL VOCs (+TICs)	8260B	glass vial	3-4 oz.	HCl to pH<2, Zero Headspace Cool to 2-4°C	14 days
	TCL SVOCs (+TICs)	8270C	amber glass	2000 mL	Cool to 2-4°C	7 days extract/40 days
	TAL Metals	6010B	plastic	600 mL	HNO_3 to pH<2 Cool to 2-4°C	6 months/Hg 28 days
	1,4 dioxane	8270SIM	amber glass	(2) 500 mL	Cool to 2-4°C	7 days extract/40 days
	PFOA/PFOS[4]	1633	HDPE/Polypropylene	2 - 500 mL	Trizma, Cool to 2-4°C	14 days
	Pesticides	8081	amber glass	1000 mL	Cool to 2-4°C	7 days extract/40 days
	Herbicides	8151	amber glass	1000 mL	Cool to 2-4°C	7 days extract/40 days
	PCBs	8082	amber glass	1000 mL	Cool to 2-4°C	7 days extract/40 days

Notes:

1. EPA-approved methods published in Note 2 may be used.
2. Test Methods for Evaluating Solid Wastes, USEPA SW-846, Update III, 1991.
3. Subset of the 97 VOCs that are included in the 189 hazardous air pollutants (HAPs) listed in Title III of the 1990 Clean Air Act Amendments.
4. Previous groundwater samples were collect via Modifed Method 537. Any additional groundwater samples will use Method 1633.

Acronyms:

VOCs = Volatile Organic Compounds
SVOCs = Semi-Volatile Organic Compounds
TCL = Target Compound List
TAL = Target Analyte List
PCBs = Polychlorinated Biphenyls
WMG = Wide Mouth Glass

F:\CAD\Benchmark\Rano Development, LLC\25 Rano Street\Rt Work Plan\Figure 4- Planned Remedial Investigation Sample Locations.dwg, DWG To PDF.pc3

LEGEND:

- PROPERTY BOUNDARY
- EXISTING BUILDINGS (to be demolished prior to RI activities)
- SB-1 ● PHASE II SOIL BORING LOCATIONS (2017)
- HA-1 ● PHASE II HAND AUGER LOCATION (2017)
- SB-9 ● SUPPLEMENTAL INVESTIGATION SOIL BORING LOCATIONS (2017)
- SS-1 ◪ SUPPLEMENTAL INVESTIGATION SURFACE SOIL LOCATION (2017)
- (3" - 2') SAMPLED INTERVAL
- SB ● PLANNED RI SOIL BORING LOCATION (16)
- MW ✥ PLANNED RI MONITORING WELL (5)
- SV ◎ PLANNED SOIL VAPOR (2)
- TP ✥ PLANNED TEST PIT (10)

NOTES:
1. LOCATION TO BE DETERMINED

○ Proposed Emergent Contaminant Sample Location

APPROXIMATE LOCATION OF APPARENT 5,000-GALLON TOLUENE UST

SS and TP samples for EC

APPROXIMATE LOCATION OF APPARENT 120-GALLON SLOP TANK UST

SEE NOTE 1

RANO STREET

TONAWANDA STREET

SUSPECT UST VENT PIPE

APPROXIMATE AREA OF FUEL OIL UST FILL PORT

APPROXIMATE AREA OF TWO FORMER 11,000-GALLON FUEL OIL USTS

MANUFACTURING FACILITY

STAINING ON EXPOSED SOIL & CONCRETE FLOOR

INACTIVE BOILER SYSTEM

PILES OF BURNT MATERIALS, AUTO PARTS, AND SOIL

SB-8 (3"-6")
SB-5 (6"-1.5')
SB-9 (4"-2.5')
SB-6
SB-4 (6"-1.5')
SB-1
SB-3
SB-10 (5'-5.5')
SB-2 (6"-3.5')
SB-7 (3"-2')
HA-1 (3'-4')
SS-1 (0-2")

SV 1, 2
TP 1, 2, 3, 4, 5, 6, 7, 8, 9, 10
MW
SB 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26

N

100' 0' 100' 200'

SCALE: 1 INCH = 100 FEET
SCALE IN FEET
(approximate)

DATE: MARCH 2018
DRAFTED BY: CMC/RFL

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC
TURNKEY ENVIRONMENTAL RESTORATION, LLC
2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218, (716) 856-0599

JOB NO.: 0418-017-005

PLANNED REMEDIAL INVESTIGATION SAMPLE LOCATIONS

REMEDIAL INVESTIGATION WORK PLAN

25 RANO STREET SITE
BUFFALO, NEW YORK

PREPARED FOR
RANO DEVELOPMENT, LLC

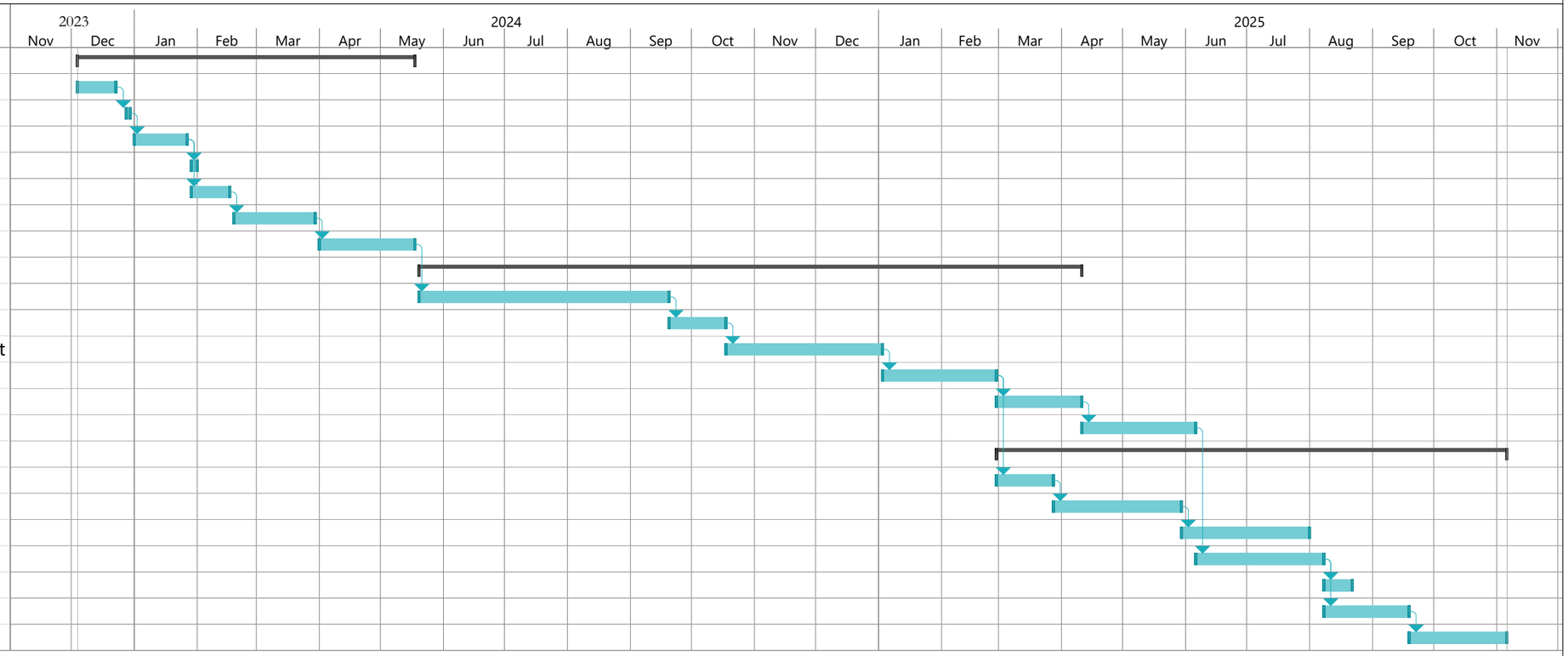
FIGURE 4

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.

Project Schedule

25 Rano Street Site, C915323
Buffalo, New York

ID	Task Name
1	**Remedial Investigation - Phase 2**
2	Advance soil borings & collect samples
3	Advance soil vapor probes & collect samples
4	Complete test pits & collect samples
5	Survey sample locations
6	Analyze soil, soil vapor, and outdoor air samples
7	Validate soil, soil vapor, air, and groundwater data
8	Review data and submit to EQuIS
9	**Reporting**
10	Prepare RI/AA Report
11	NYSDEC Review
12	45-Day Public Comment Period / Decision Document
13	Prepare Remedial Action Work Plan (RAWP)
14	NYSDEC Review of RAWP
15	**Perform Remedial Action**
16	**Post-Remedial Documentation**
17	Prepare Draft Environmental Easement (due Jun. 1)
18	Prepare Draft Site Management Plan (due Aug. 1)
19	Revise & Submit Final SMP (due Oct. 1)
20	Prepare Draft Final Engineering Report (due Oct. 1)
21	Record EE & Provide Notices (due Oct. 15)
22	Revise & Submit FER (due Nov. 15)
23	Certificate of Completion



Project Schedule (March 2023).m
Updated Mon 3/20/23

Task	Project Summary	Manual Task	Start-only	Deadline
Split	Inactive Task	Duration-only	Finish-only	Progress
Milestone	Inactive Milestone	Manual Summary Rollup	External Tasks	Manual Progress
Summary	Inactive Summary	Manual Summary	External Milestone