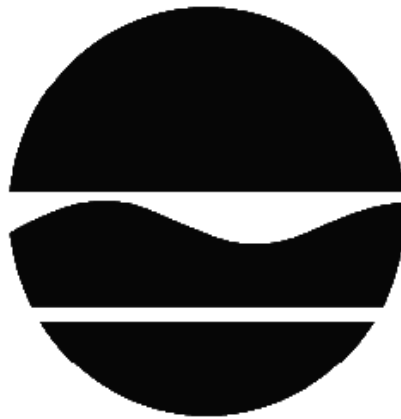


# DECISION DOCUMENT

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201 Ellicott Street Site  
Brownfield Cleanup Program  
Buffalo, Erie County  
Site No. C915331  
August 2020



Prepared by  
Division of Environmental Remediation  
New York State Department of Environmental Conservation

# **DECLARATION STATEMENT - DECISION DOCUMENT**

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201 Ellicott Street Site  
Brownfield Cleanup Program  
Buffalo, Erie County  
Site No. C915331  
August 2020

## **Statement of Purpose and Basis**

This document presents the remedy for the 201 Ellicott Street site, a brownfield cleanup site. The remedial program was chosen in accordance with the New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 375.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the 201 Ellicott Street site and the public's input to the proposed remedy presented by the Department.

## **Description of Selected Remedy**

During the course of the investigation certain actions, known as interim remedial measures (IRMs), were undertaken at the above referenced site. An IRM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the remedial investigation (RI) or alternatives analysis (AA). The IRMs undertaken at this site are discussed in Section 6.2.

The implementation of the IRMs and the results of the RI indicate that the site no longer poses a threat to human health or the environment; therefore, No Further Action is the selected remedy. The remedy may include continued operation of a remedial system if one was installed during the IRM and the implementation of any prescribed institutional controls/engineering controls (ICs/ECs) that have been identified as being part of the proposed remedy for the site.

## **Declaration**

The remedy conforms with promulgated standards and criteria that are directly applicable, or that are relevant and appropriate and takes into consideration Department guidance, as appropriate. The remedy is protective of public health and the environment.

*Michael Cruden*

8/4/2020

Date

Michael Cruden, Director  
Remedial Bureau E

# DECISION DOCUMENT

201 Ellicott Street Site  
Buffalo, Erie County  
Site No. C915331  
August 2020

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## **SECTION 1: SUMMARY AND PURPOSE**

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), has selected a remedy for the above referenced site. The disposal of contaminants at the site resulted in threats to public health and the environment that were addressed by actions known as interim remedial measures (IRMs), which were undertaken at the site. An IRM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before completion of the remedial investigation (RI) or alternative analysis (AA). The IRMs undertaken at this site are discussed in Section 6.2.

Based on the implementation of the IRMs, the findings of the investigation of this site indicate that the site no longer poses a threat to human health or the environment. The IRMs conducted at the site attained the remediation objectives identified for this site, which are presented in Section 6.5, for the protection of public health and the environment. No Further Action is the selected remedy. A No Further Action remedy may include continued operation of any remedial system installed during the IRM and the implementation of any prescribed controls that have been identified as being part of the remedy for the site. This Decision Document identifies the IRMs conducted and discusses the basis for No Further Action.

The New York State Brownfield Cleanup Program (BCP) is a voluntary program. The goal of the BCP is to enhance private-sector cleanups of brownfields and to reduce development pressure on "greenfields." A brownfield site is real property, the redevelopment or reuse of which may be complicated by the presence or potential presence of a contaminant.

The Department has issued this document in accordance with the requirements of New York State Environmental Conservation Law and 6 NYCRR Part 375. This document is a summary of the information that can be found in the site-related reports and documents.

## **SECTION 2: CITIZEN PARTICIPATION**

The Department seeks input from the community on all remedies. A public comment period was held, during which the public was encouraged to submit comment on the proposed remedy. All comments on the remedy received during the comment period were considered by the Department in selecting a remedy for the site. Site-related reports and documents were made available for review by the public at the following document repositories.

Buffalo & Erie County Public Library  
1 Lafayette Square  
Buffalo, NY 14203  
Phone: (716) 858-8900

DECInfo Locator - Web Application  
<https://gisservices.dec.ny.gov/gis/dil/index.html?rs=C915331>

### **Receive Site Citizen Participation Information By Email**

Please note that the Department's Division of Environmental Remediation (DER) is "going paperless" relative to citizen participation information. The ultimate goal is to distribute citizen participation information about contaminated sites electronically by way of county email listservs. Information will be distributed for all sites that are being investigated and cleaned up in a particular county under the State Superfund Program, Environmental Restoration Program, Brownfield Cleanup Program and Resource Conservation and Recovery Act Program. We encourage the public to sign up for one or more county listservs at <http://www.dec.ny.gov/chemical/61092.html>

### **SECTION 3: SITE DESCRIPTION AND HISTORY**

**Location:** The 201 Ellicott Street site is a 2.477-acre site located in a highly developed residential and commercial area in the City of Buffalo. The site encompasses an entire city block and is bounded by Clinton Street to the north, East Eagle Street to the south, Oak Street to the east, and Ellicott Street to the west.

**Site Features:** The site is currently being developed, with construction of the future buildings being performed. The buildings being constructed will be used for affordable housing and a local market.

**Current Zoning and Land Use:** The current zoning for the site and the adjacent properties is N-1C, mixed-use. The project area is planned as a mixed-use residential and commercial development, consistent with the City of Buffalo zoning for the area.

**Past Use of the Site:** From the late 1800s until the early 1980s portions of the site included various commercial uses. Past commercial uses included a blacksmith shop, the National Lead Company, Buffalo Kay Chemical Company, Inc., a salvage shop, auto repair shops, a laundromat, several commercial retail shops, a hotel and various restaurants. The property was acquired by the City of Buffalo in the early 1960s and was converted to a surface parking lot. The site was used as a surface parking lot until 2019. Prior to entering the BCP the property was acquired by 201 Ellicott LLC.

**Site Geology and Hydrogeology:** The overburden geology below the surface of the site consists of urban fill (brick, ash, concrete, etc.) ranging in thickness from 2 to 11 feet below ground surface (fbgs), underlain by native soils consisting of brown silt and silty clay. Bedrock was encountered at 54 fbgs. A total of four monitoring wells were installed on-site. Three separate groundwater zones were identified during the construction of the monitoring wells. Groundwater was encountered in a shallow perched zone at an approximate depth of 7 fbgs, in the deep native soil

zone at approximately 14 fbgs, and within the bedrock zone at 34 fbgs. Groundwater flow in urban areas is influenced by preferential pathways, such as, sewers. Regional groundwater flow in the Buffalo urban area is northwest toward Lake Erie and the Niagara River.

A site location map is attached as Figure 1, with a site plan attached as Figure 2.

#### **SECTION 4: LAND USE AND PHYSICAL SETTING**

The Department may consider the current, intended, and reasonably anticipated future land use of the site and its surroundings when evaluating a remedy for soil remediation. For this site, an alternative which allows for unrestricted use of the site was evaluated.

A comparison of the results of the investigation against unrestricted use standards, criteria and guidance values (SCGs) for the site contaminants is available in the Remedial Investigation Alternatives Analysis (RI-AA) Report.

#### **SECTION 5: ENFORCEMENT STATUS**

The Applicant under the Brownfield Cleanup Agreement is a Volunteer. The Applicants does not have an obligation to address off-site contamination. However, the Department has determined that this site does not pose a significant threat to public health or the environment; accordingly, no enforcement actions are necessary.

#### **SECTION 6: SITE CONTAMINATION**

##### **6.1: Summary of the Remedial Investigation**

A RI serves as the mechanism for collecting data to:

- characterize site conditions;
- determine the nature of the contamination; and
- assess risk to human health and the environment.

The RI is intended to identify the nature (or type) of contamination which may be present at a site and the extent of that contamination in the environment on the site, or leaving the site. The RI reports on data gathered to determine if the soil, groundwater, soil vapor, indoor air, surface water or sediments may have been contaminated. Monitoring wells are installed to assess groundwater and soil borings or test pits are installed to sample soil and/or waste(s) identified. If other natural resources are present, such as surface water bodies or wetlands, the water and sediment may be sampled as well. Data collected in the RI influence the development of remedial alternatives. The RI-AA report is available for review in the site document repository and the results are summarized in section 6.3.

The analytical data collected on this site includes data for:

- soil

- groundwater

### **6.1.1: Standards, Criteria, and Guidance (SCGs)**

The remedy must conform to promulgated standards and criteria that are directly applicable or that are relevant and appropriate. The selection of a remedy must also take into consideration guidance, as appropriate. Standards, Criteria and Guidance are hereafter called SCGs.

To determine whether the contaminants identified in various media are present at levels of concern, the data from the RI were compared to media-specific SCGs. The Department has developed SCGs for groundwater, surface water, sediments, and soil. The NYSDOH has developed SCGs for drinking water and soil vapor intrusion. For a full listing of all SCGs see: <http://www.dec.ny.gov/regulations/61794.html>

### **6.1.2: RI Results**

The data have identified contaminants of concern. A "contaminant of concern" is a contaminant that is sufficiently present in frequency and concentration in the environment to require evaluation for remedial action. Not all contaminants identified on the property are contaminants of concern. The nature and extent of contamination and environmental media requiring action are summarized below. Additionally, the RI-AA Report contains a full discussion of the data. The contaminants of concern (COC) identified at this site are:

acetone	lead
arsenic	4-methylphenol
benzo(a)anthracene	mercury
benzo(b)fluoranthene	naphthalene
benzo(k)fluoranthene	nickel
benzo(a)pyrene	trichloroethylene
chrysene	1,2,4-trimethylbenzene
copper	phenanthrene
dibenz[a,h]anthracene	phenol
dibenzofuran	xylene
fluoranthene	zinc
indeno(1,2,3-CD)pyrene	

Based on the investigation results, comparison to the SCGs, and the potential public health and environmental exposure routes, certain media and areas of the site required remediation. These media were addressed by the IRMs described in Section 6.2. More complete information can be found in the RI-AA Report.

### **6.2: Interim Remedial Measures**

An IRM is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before issuance of the Decision Document.

The following IRMs have been completed at this site based on conditions observed during the RI.

#### Excavation of Contaminated Soil Materials

Based upon investigations conducted prior to the IRMs, primary COCs at the site include volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and metals at varying depths beneath the site.

An IRM was implemented to sample and remove all contaminated soil, fill material, and to remediate the site to unrestricted use soil cleanup objectives (UUSCOs). The IRM completed at the site consisted of excavation and off-site disposal of contaminated soil/fill until UUSCOs were achieved. The site was divided into 42 grids, each grid had an area of 50-feet by 50-feet. Prior to the excavation, native soil samples were collected from each grid to evaluate soil quality. The depths of the native soil samples ranged from 4 to 15 feet. Laboratory analysis of the 42 grid samples confirmed the depths at which UUSCOs would be achieved. In addition, a total 16 perimeter borings were advanced along the property boundaries. The excavation extended to the site boundaries where perimeter samples were collected. Results of the perimeter samples indicated that the fill/soil on adjoining properties does not meet UUSCOs. All impacted soil/fill removed from the site was properly handled and disposed of off-site at either an appropriately permitted landfill or permitted solid waste management facility. The IRM was completed between the months of September and December 2019.

The excavation depth varied from 4 to 11.5 fbs. Approximately 50,971 tons of urban fill and non-hazardous contaminated soil exceeding UUSCOs were removed from the site and transported off-site to a permitted disposal facility. During the soil excavation three underground storage tanks (USTs) were encountered. Each of the three tanks had an estimated capacity of 500-gallons, but no product was found within the USTs. The tanks were removed from the site during IRM activities. The IRM excavations were backfilled to meet design grades using crushed stone that met the import requirements outlined in the Department's technical guidance for site investigations and remediation (DER-10).

These IRM activities are documented in the RI-AA Report dated June 2020 and the Construction Completion Report (CCR) dated July 2020. The extent of the IRM excavation is depicted in the attached Figure 3.

#### **6.3: Summary of Environmental Assessment**

This section summarizes the assessment of existing and potential future environmental impacts presented by the site. Environmental impacts may include existing and potential future exposure pathways to fish and wildlife receptors, wetlands, groundwater resources, and surface water. The RI report presents a detailed discussion of any existing and potential impacts from the site to fish and wildlife receptors.

Several site investigations were conducted on this site. A Phase I and II investigation was performed in September 2016 and some additional soil and groundwater characterization was completed in 2017.



Under the BCP, a RI was conducted in May of 2019. The RI sampled subsurface urban fill material, native soils, and the groundwater. The RI data was used to determine the excavation limits for the IRM. The data collected during the site investigations and RI showed subsurface soil/fill impacts at varying depths and concentrations throughout the site. Off-site areas were not investigated during the RI, but perimeter borings were advanced along the property boundaries.

#### Nature and Extent of Contamination:

##### Surface Soil:

Surface soil samples were not collected during the RI. The majority of the site was covered with an asphalt parking lot and limited greenspace/vegetation. All surface soil present at the time of the RI was excavated and addressed under the IRM.

##### Subsurface Soil:

Prior to the implementation of the IRM, urban fill and native soil samples were collected from depths ranging from 2 to 15 fbs at 42 locations across the site. Samples were analyzed for VOCs, SVOCs, pesticides, polychlorinated biphenyls (PCBs), metals, Per- and polyfluoroalkyl substances (PFAS). Pesticides, PCBs, and PFAS were either not detected or detected at concentrations below the UUSCOs.

VOCs exceeding UUSCOs include:

- 1,2,4-trimethylbenzene up to 30 part per million (ppm) (UUSCO 3.6 ppm);
- acetone up to 0.25 ppm (UUSCO 0.05 ppm); and
- xylene up to 19 ppm (UUSCO 0.26 ppm).

SVOCs exceeding UUSCOs include:

- 4-methylphenol up to 0.55 ppm (UUSCO 0.33 ppm);
- benzo(a)anthracene up to 55 ppm (UUSCO 1 ppm);
- benzo(a)pyrene up to 47 ppm (UUSCO 1 ppm);
- benzo(b)fluoranthene up to 62 ppm (UUSCO 1 ppm);
- benzo(k)fluoranthene up to 26 ppm (UUSCO 0.8 ppm);
- chrysene up to 52 ppm (UUSCO 1 ppm);
- dibenzo(a,h)anthracene up to 7.7 ppm (UUSCO 0.33 ppm);
- dibenzofuran up to 17 ppm (UUSCO 7 ppm);
- fluoranthene up to 130 ppm (UUSCO 100 ppm);
- indeno(1,2,3-cd)pyrene up to 29 ppm (UUSCO 0.5 ppm);
- naphthalene up to 24 ppm (UUSCO 12 ppm);
- phenanthrene up to 140 ppm (UUSCO 100 ppm); and
- phenol up to 0.41 ppm (UUSCO 0.33 ppm).

Metals exceeding UUSCOs include:

- arsenic up to 16.4 ppm (UUSCO 13 ppm);
- copper up to 65 ppm (UUSCO 50 ppm);

- lead up to 401 ppm (UUSCO 63 ppm);
- mercury up to 1.9 ppm (UUSCO 0.18 ppm);
- nickel up to 37 ppm (UUSCO 30 ppm); and
- zinc up to 309 ppm (UUSCO 109 ppm).

Perimeter soil samples were collected from 1 to 8 fbgs along the site boundary. Samples were analyzed for VOCs, SVOCs, pesticides, PCBs, metals, Per- and polyfluoroalkyl substances (PFAS). Pesticides, PCBs, and PFAS were either not detected or detected at concentrations below the UUSCOs or action levels. Perimeter samples exceeding UUSCOs include:

VOCs exceeding UUSCOs include:

- acetone up to 0.067 ppm (UUSCO 0.05 ppm).

SVOCs exceeding UUSCOs include:

- benzo(a)anthracene up to 11 ppm (UUSCO 1 ppm);
- benzo(a)pyrene up to 10 ppm (UUSCO 1 ppm);
- benzo(b)fluoranthene up to 15 ppm (UUSCO 1 ppm);
- benzo(k)fluoranthene up to 4.9 ppm (UUSCO 0.8 ppm);
- chrysene up to 11 ppm (UUSCO 1 ppm);
- dibenzo(a,h)anthracene up to 0.98 ppm (UUSCO 0.33 ppm); and
- indeno(1,2,3-cd)pyrene up to 6 ppm (UUSCO 0.5 ppm).

Metals exceeding UUSCOs include:

- arsenic up to 270 ppm (UUSCO 13 ppm);
- copper up to 70.9 ppm (UUSCO 50 ppm);
- lead up to 2,410 ppm (UUSCO 63 ppm);
- mercury up to 1.2 ppm (UUSCO 0.18 ppm);
- selenium up to 8.4 ppm (UUSCO 3.9 ppm); and
- zinc up to 323 ppm (UUSCO 109 ppm).

On-site soil exceeding the UUSCOs was excavated and transported off-site for disposal as part of a soil removal IRM. The final excavation depth of each grid was determined by native soil samples that met the UUSCOs. The IRM removed all on-site soils exceeding the UUSCOs. Perimeter samples indicate that sol/fill exceeding the UUSCOs remains present along the adjoining properties.

#### Groundwater:

Four monitoring wells were installed across the site. The monitoring wells were used to investigate three separate groundwater zones. Two shallow groundwater monitoring wells MW-B8 and MW-B9 were installed in the perched water zone. Both MW-B8 and MW-B9 were screened from approximately 6 to 16 fbgs; the depth to groundwater was approximately 7 fbgs. MW-B7 was installed in the deep native soils and was screened from 25.6 to 30.6 fbgs; the depth to groundwater was approximately 14 fbgs. MW-B10 was installed in the bedrock zone and was screened from

53.7 to 63.7 fbg; depth to groundwater was approximately 34 fbg. Samples were analyzed for VOCs, SVOCs, metals, per- and polyfluoroalkyl substances (PFAS), and 1,4-dioxane. Pesticides and PCBs were either not detected or detected at concentrations below the groundwater quality standards (GWQS) in all zones.

Exceedances in the shallow groundwater zone include VOCs, SVOCs, and metals.

VOCs exceeding groundwater quality standards (GWQS) in the shallow zone include:

- trichloroethylene up to 8 parts per billion (ppb) (GWQS 5 ppb).

SVOCs exceeding GWQS in the shallow zone include:

- benzo(b)fluoranthene up to 0.75 ppb (GWQS 0.002 ppb);
- chrysene up to 0.45 ppb (GWQS 0.002 ppb); and
- indeno(1,2,3-cd)pyrene up to 0.52 ppb (GWQS 0.002 ppb).

Metals exceeding GWQS in the shallow zone include:

- manganese up to 350 ppb (GWQS 300); and
- selenium up to 14.3 ppb (GWQS 10 ppb).

Metals exceeding GWQS in the deep zone include:

- arsenic up to 49.9 ppb (GWQS 25).

There were no exceedances of VOCs, SVOCs, or metals in the bedrock groundwater zone.

All 4 monitoring wells were analyzed for per- and polyfluoroalkyl substances (PFAS), with at least one PFAS compound detected in all of the wells. PFOA (up to 18 parts per trillion (ppt)) and PFOS (up to 8.3 ppt) were detected in one shallow zone well. Total PFAS concentrations ranged from 5.74 to 110.81 ppt. Detections of PFOA or PFOS above the 10 ppt screening level are limited to the shallow zone wells MW-B8 and MW-B9. 1,4-dioxane was analyzed in samples from all four monitoring wells. 1,4-dioxane was only detected in the deep zone, MW-B7 at 0.1 ppb (screening level 1 ppb). The Buffalo Water Authority provides potable drinking water to the site and surrounding area.

#### Soil Vapor:

Due to the low-level detections of TCE in groundwater a soil vapor intrusion (SVI) assessment will be performed to evaluate vapor intrusion at the site. The SVI assessment cannot be completed until the site building has been constructed. Therefore, an environmental easement has been recorded for the site requiring compliance with a site management plan (SMP) that includes a vapor intrusion test after the building is constructed.

#### **6.4: Summary of Human Exposure Pathways**

Remedial actions taken have eliminated the potential for contact with site-related contaminants in soil. People are not drinking the contaminated groundwater because the area is served by a public water supply that obtains water from a different source. Volatile organic compounds in

contaminated groundwater or contaminated soils may move into the soil vapor (air spaces within the soil), which in turn may move into overlying buildings and affect the indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. As the site is vacant, soil vapor intrusion is not a current concern. Soil vapor intrusion is not a concern for off-site areas.

## **6.5: Summary of the Remediation Objectives**

The objectives for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375. The goal for the remedial program is to restore the site to pre-disposal conditions to the extent feasible. At a minimum, the remedy shall eliminate or mitigate all significant threats to public health and the environment presented by the contamination identified at the site through the proper application of scientific and engineering principles.

The remedial action objectives (RAOs) for this site are:

### **Soil**

#### **RAOs for Public Health Protection**

- Prevent ingestion/direct contact with contaminated soil.

#### **RAOs for Environmental Protection**

- Prevent migration of contaminants that would result in groundwater or surface water contamination.

### **Groundwater**

#### **RAOs for Public Health Protection**

- Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.

### **Soil Vapor**

#### **RAOs for Public Health Protection**

- Mitigate impacts to public health resulting from existing, or the potential for, soil vapor intrusion into buildings at the site.

## **SECTION 7: ELEMENTS OF THE SELECTED REMEDY**

Based on the results of the investigations at the site, the IRM that has been performed, and the evaluation presented here, the Department has selected No Further Action as the remedy for the site. The Department believes that this remedy is protective of human health and the environment and satisfies the remediation objectives described in Section 6.5. The use of groundwater as a source of potable or process water is restricted due to a requirement of the Buffalo Water Board Regulations (21 NYCRR § 10085.3) that “every dwelling, house or other building requiring the use of water must be supplied from the water mains of the water board...”. As public water suppliers must also meet the requirements of 10 NYCRR Chapter I Subpart 5-2, no additional restrictions on potable use are necessary.

The completed IRM met the requirements for a Track 1 unrestricted use cleanup but is contingent upon the performance and evaluation of a soil vapor intrusion (SVI) evaluation within the site's future building (which is currently under construction). The SVI evaluation will determine if both engineering controls and institutional controls are necessary at the site. If the SVI evaluation indicates that mitigation of the building is needed to address exposures, an SSDS will need to be fully installed, operated, and maintained.

The intent of the remedy is to achieve Track 1 unrestricted use; therefore, no environmental easement or site management plan is anticipated. However, an environmental easement has been placed on the site, until a Track 1 cleanup can be verified with the results of the SVI evaluation. If a mitigation or monitoring action is needed, a Track 1 cleanup can only be achieved if the mitigation system or other required action is no longer needed within 5 years of the date of the Certificate of Completion.

In the event that Track 1 unrestricted use is not achieved, the following contingent remedial elements will be required, and the remedy will achieve a Track 2 residential cleanup.

#### Engineering and Institutional Controls:

Imposition of an institutional control in the form of an environmental easement and a Site Management Plan, will be required as described below. The remedy will achieve a Track 2 residential cleanup at a minimum and will include an environmental easement and site management plan. Imposition of an engineering control in the form of a sub slab depressurization system (SSDS) may be required as described below.

#### Institutional Control:

Imposition of an institutional control in the form of an environmental easement for the controlled property which will:

- Require the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- Allow the use and development of the controlled property for residential, commercial and industrial use as defined by Part 375-1.8(g), although land use is subject to local zoning laws; and
- Require compliance with the Department's approved Site Management Plan (SMP).

#### Site Management Plan (SMP):

A SMP is required, which includes the following:

a. An Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective:

- Institutional Controls: The environmental easement as discussed above.
- Engineering Controls: The installation and continued operation and maintenance of an SSDS if determined to be required based on the SVI evaluation.

This plan includes, but may not be limited to:

- A provision for evaluation of the potential for soil vapor intrusion for any occupied buildings on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion, if necessary;
- Provisions for the management and inspection of the identified engineering controls;
- Maintaining site access controls and Department notification; and
- The steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

b. A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:

- A schedule of monitoring and frequency of submittals to the Department; and
- Monitoring for vapor intrusion for any buildings on the site, as may be required by the Institutional and Engineering Control Plan discussed above.

c. An Operation and Maintenance (O&M) Plan to ensure continued operation, maintenance, inspection, and reporting of any mechanical or physical components of the active vapor mitigation system(s). The plan includes, but is not limited to:

- Procedures for operating and maintaining the system(s); and
- Compliance inspection of the system(s) to ensure proper O&M as well as providing the data for any necessary reporting.





Project: 201 Elliott Street Site Brownfield Cleanup Program  
Drawing: 201 Elliott Street Site Brownfield Cleanup Program  
Date: 03/12/2018  
Drawn by: C. Martin  
Designed by: C. Martin  
Checked by: D. Riker  
No alteration permitted hereon except as provided under Section 7209 Subsection 2 of the New York Education Law



#### LEGEND

PROPERTY SURVEY	BROWNFIELD CLEANUP BOUNDARY
UE	UNDERGROUND ELECTRIC
UT	UNDERGROUND TELEPHONE
UC	UNDERGROUND COMMUNICATIONS
SS	SANITARY SEWER
ST	STORM SEWER
W	WATER
G	GAS
U	UNKNOWN UNDERGROUND UTILITY
F	FENCE
GL	GUIDE RAIL
TL	TRAFFIC LIGHT
LP	LIGHT POLE
LB	LIGHT BASE ONLY
CB	CATCH BASIN
CM	COMBINATION MANHOLE
SM	STORM MANHOLE
PM	PARKING METER
PR	PARKING RECEIVER
BP	PARKING BUTTON
GP	GUARD POST
CD	CLEARDIRT
GV	GAS VALVE
WV	WATER VALVE
HY	HYDRANT
PA	TELEPHONE
TM	TELEPHONE MANHOLE
TRM	TRAFFIC MANHOLE
LM	LIGHTING MANHOLE
EM	ELECTRIC MANHOLE
NS	SIGN
NFV	NOT FIELD VERIFIED

#### NOTES

1) PROPERTY SURVEY FROM MCINTOSH & MCINTOSH, P.C., SURVEY OF PART OF OUTER LOTS 110 & 111, AUGUST 18, 2016.



C&S Engineers, Inc.  
141 Elm Street  
Buffalo, New York 14203  
Phone: 716-847-1630  
Fax: 716-847-1454  
www.cscos.com



201 ELLIOTT STREET SITE  
BROWNFIELD CLEANUP PROGRAM  
SITE NO. C915331  
CITY OF BUFFALO, NY

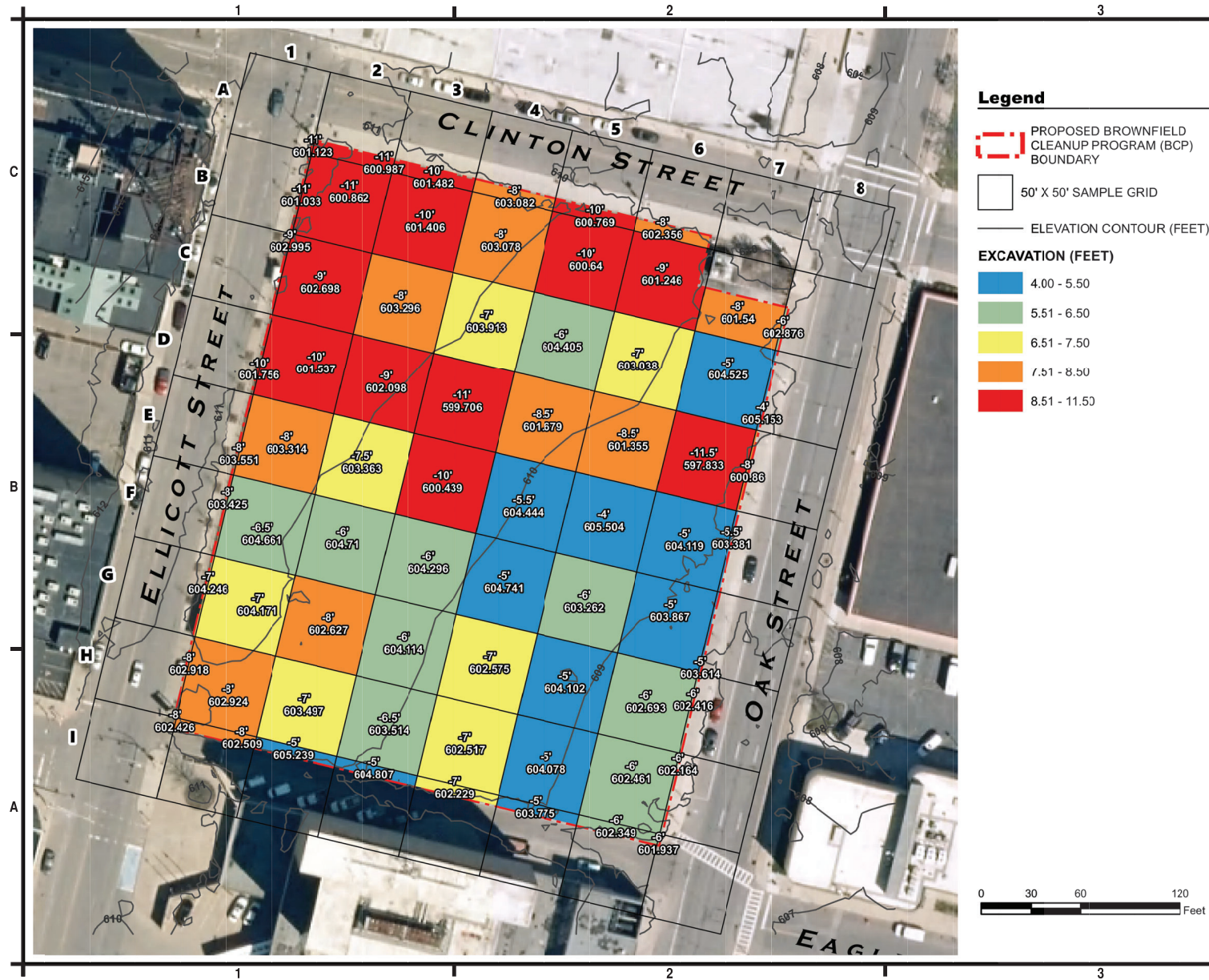
MARK	DATE	DESCRIPTION
REVISIONS		
PROJECT NO.	E67.020.002	
DATE:	03/12/2018	
DRAWN BY:	C. MARTIN	
DESIGNED BY:	C. MARTIN	
CHECKED BY:	D. RIKER	


NO ALTERATION PERMITTED HEREON EXCEPT AS PROVIDED UNDER SECTION 7209 SUBSECTION 2 OF THE NEW YORK EDUCATION LAW

PROJECT AREA &  
SITE BOUNDARIES


FIGURE 2







**C&S Companies, Inc.**  
 141 Elm Street  
 Buffalo, New York 14203  
 Phone: 716-847-1630  
 Fax: 716-847-1454  
 www.cscos.com



**201 ELLICOTT STREET SITE  
 BROWNFIELD CLEANUP PROGRAM  
 SITE NO. C915331  
 CITY OF BUFFALO, NY**

MARK	DATE	DESCRIPTION
REVISIONS		
PROJECT NO.	E67.020.002	
DATE	08/18/2019	
DRAWN BY:	C. MARTIN	
DESIGNED BY:	C. MARTIN	
CHECKED BY:	D. RIKER	
<small>NO ALTERATION PERMITTED HEREON EXCEPT AS PROVIDED UNDER SECTION 7209 SUBDIVISION 2 OF THE NEW YORK EDUCATION LAW</small>		

**TRACK 1  
 CLEANUP**

**FIGURE 7**