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VIA EMAIL

May 15, 2025
File No. 21.0056855.20

Mr. Benjamin McPherson
New York State Department of Environmental Conservation (NYSDEC)
Division of Environmental Remediation
700 Delaware Avenue
Buffalo, New York 14209
email: benjamin.mcpherson@dec.ny.gov

Re: Proposed Imported Backfill Sampling and Analysis Plan
Huntley Power South Parcel
Brownfield Cleanup Program (BCP) Site Number C915337
Town of Tonawanda, New York (Site)

Mr. McPherson:

GZA GeoEnvironmental of New York (GZA), on behalf of our client, Huntley Power LLC, presents this sampling plan to evaluate material for potential use as backfill at the above referenced BCP Site. The material stockpile is staged at 4100 Southwestern Boulevard in Orchard Park, New York and was generated by the adjoining Highmark Stadium construction project. The stockpiled materials primarily consist of virgin native shale bedrock.

The stockpile consists of approximately 650,000 cubic yards of material. Approximately 100,000 to 450,000 cubic yards of material may be used as backfill at the Site, as to be determined by how much is made available by the Buffalo Bills.

Sampling and analyses will be conducted in accordance with NYSDEC DER-10 guidance and the NYSDEC approved Remedial Investigation Work Plan. However, due to the volume of the material and because it is an assumed virgin source, GZA proposes initial sampling of the stockpile at 8 discrete and accessible locations (**Figure 1**). Observations for visual and olfactory evidence of petroleum will be made during sampling. Additionally, sampled materials will be screened with a photoionization detector (PID) organic vapor meter equipped with a 10.6 electron volt (eV) bulb. Samples will be collected from at least six inches below the pile surface.

Eight discrete samples will be analyzed for target compound list (TCL) volatile organic compounds (VOCs). Two composite samples (as indicated on **Figure 1**) will be collected from the 8 sampling locations and analyzed for TCL semi volatile organic compounds (SVOCs), Part 375 total metals, TCL pesticides, TCL polychlorinated biphenyls (PCBs), cyanide, and per- and polyfluoroalkyl analytes (PFAAs) via EPA Method 1633. GZA will also collect two initial composite samples for Part 375 total metals analysis via Toxicity Characteristic Leaching Procedure (TCLP).

If analytical results indicate the material is suitable for backfill at the Site, GZA and NRG will consult with NYSDEC on the frequency of additional testing during material loadout, if required. Additional testing would include discrete sampling for TCL VOC analysis and composite sampling for TCL SVOCs, Part 375 total metals, TCL pesticides, TCL PCBs, cyanide, and PFAAs analyses.

GZA will provide the initial analytical results to NYSDEC with a "Request to Import/Reuse Fill or Soil Form". Subsequent analytical results, if additional testing is required and conducted, will be provided to NYSDEC following receipt of the reports from the laboratory.

If you need any additional information, please call Thomas Bohlen at (716) 844-7050.

Sincerely,

GZA GEOENVIRONMENTAL OF NEW YORK

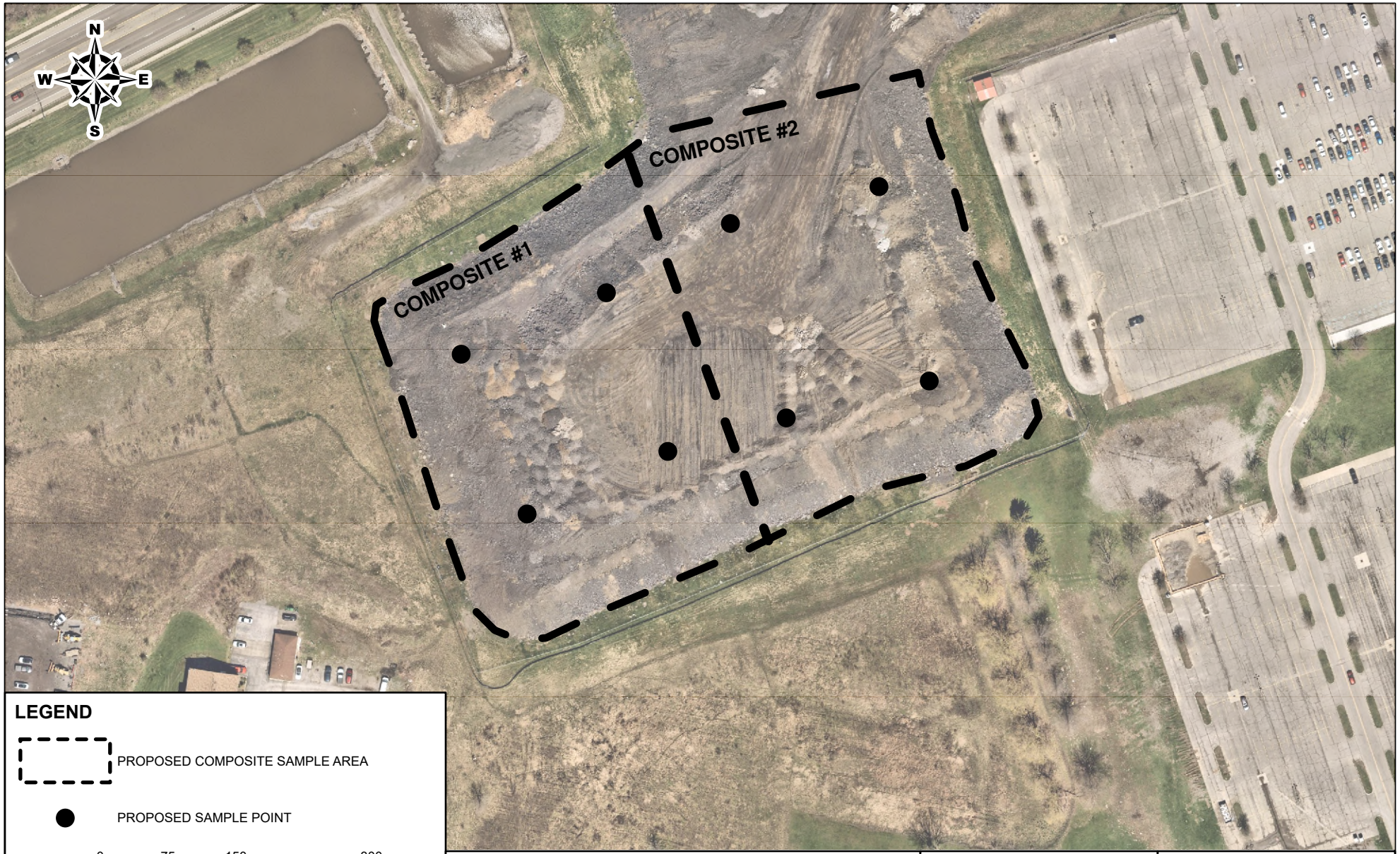
Thomas Bohlen, P.G.
Senior Project Manager

Bart A. Klettke, P.E.
Principal

Cc: George Streit (Huntley Power LLC)

Attachment: Figure 1 - Proposed Stockpile Sampling Locations

K:\21\PROJECTS\56800s\56855.20 Huntley Power RI\GIS\Pro Projects\Stadium Soils Sampling.aprx, May 07, 2025 - 3:37 PM, ernest.thalhamer



LEGEND

PROPOSED COMPOSITE SAMPLE AREA

PROPOSED SAMPLE POINT

0 75 150 300

SCALE IN FEET

4100 SOUTHWEST BOULEVARD
ORCHARD PARK, NEW YORK 14127

PREPARED BY:
GZA GeoEnvironmental, Inc.
www.gza.com

PREPARED FOR:
NRG HUNTLEY POWER, LLC

PROPOSED SAMPLING LOCATIONS

PROJ MGR:	TB	REVIEWED BY:	BK	CHECKED BY:	TB
DESIGNED BY:	ET	DRAWN BY:	ET	SCALE:	1:1,800
DATE:	MAY 2025	PROJECT NO:	21.0056955.20	REVISION NO:	

FIGURE
1