BRYDGES ENGINEERING
IN ENVIRONMENT AND ENERGY, DPC

Date: March 5, 2025

To: Taylor Monnin
Assistant Engineer
New York State Department of Environmental Conservation
Division of Environmental Remediation
700 Delaware Avenue, Buffalo, NY 14209

From: BE3

Subject: **RI/AAR Data Gaps – Revised Supplemental RI Scope – Site No. C915390 - 308 Crowley Avenue – Buffalo, NY- Erie County**

On behalf of Greg Baker and Jemal's King Sewing L.L.C., the New York State Department of Environmental Conservation (NYSDEC) supplemental Remedial Investigation (RI) scope comments dated February 3, 2025, were reviewed regarding BE3's previously submitted "RI/AAR Data Gaps – Supplemental RI Scope" document dated August 29, 2024, for 308 Crowley Avenue (BCP Site No. C915390). This revised document reflects the NYSDEC supplemental RI scope comments.

All additional work is to be performed using the same methods, means and guidance for data collection as specified in the approved Remedial Investigation Work Plan (RIWP) and used in acquiring existing Site data. The approved Community Air Monitoring Plan (CAMP) from the RIWP will be in place and followed during ground intrusive activities for the supplemental investigation. The additional data obtained will be included in the final Remedial Investigation/Alternative Analysis Report (RI/AAR). The following additional work will be performed to supplement the existing RI data.

Floor Drain Survey

A survey will be conducted to identify existing building floor drains and sumps across the Site. Grates and covers will be removed as needed to assess drain/sump contents. Contents will be characterized based upon field observations including, as required, sampling and off-site disposal to meet applicable regulations.

PCB Survey

A polychlorinated biphenyl (PCB) survey will be conducted to identify transformer oils, lubricating oils, window caulking, and fluorescent light fixtures for suspect PCB containing materials and collect verification samples. The samples will be submitted to an accredited laboratory to determine the presence of PCBs and compare against existing standards. The survey will also investigate lighting ballasts for PCB related labelling and provide a count of fixtures that are not labelled as being non-PCB containing. A report will be developed for inclusion in the RI report. Note that analytical results from the PCB survey will also include Data Usability Summary Reports (DUSRs) in accordance with Appendix C - Quality Assurance/Quality Control Plan.

Soil

Approximately five additional soil borings will be performed to an estimated depth of 8 to 16 fbgs, to native soil or refusal using Geoprobe® direct push technologies, with a two-inch diameter, 4-foot-long sampler. A photoionization detector (PID) will be used to assess soil collected in each liner, and a record of soil stratigraphy and soil gas readings will be recorded**.** Soil samples will be collected from locations showing the highest PID reading or visual/olfactory observations; or based on location. **An estimated 5 soil samples** will be collected and analyzed for NYSDEC Part 375 Target Compound List (TCL) volatile organic compounds (VOCs) + tentatively identified compounds (TICs).

Samples will be selected based upon the following agreed upon approach between BE3 and DEC:

- One soil boring will be performed directly adjacent to the RI BH-13 location and a soil sample will be collected from the black sand fill material with a solvent odor at an approximate depth of 4 to 8 feet below ground surface (bgs).
- Four soil borings will be installed around the RI VP-3 location at an approximate distance of 50 feet. Previous investigation indicated the need to identify a potential source of elevated trichloroethene (TCE) concentrations in the soil vapor.

Refer to **Figure 1** for approximate sample locations.

Soil Vapor

To further delineate elevated TCE concentrations detected in sub-slab RI soil vapor samples from locations RI-VP-2 and RI-VP-3, three additional sub-slab soil vapor probes will be installed as follows:

- SRI-VP-7 (adjacent RI-VP-2)
- SRI-VP-8 (adjacent RI-VP-3)
- SRI-VP-9 (proximity to RI-MW-3 within enclosed building)

Soil vapor probes will be installed and sampled per the requirements outlined in the approved RIWP. Approximate vapor probe locations are shown on **Figure 1**. All samples will be analyzed for TCL VOCs by Environmental Protection Agency (EPA) Method TO-15.

Groundwater

One additional groundwater monitoring well will be installed using a conventional truck mounted drill rig with hollow stem auger drilling techniques to an approximate depth of 50 fbgs. The well will consist of a 2-inch inside diameter, schedule 40 PVC casing equipped with a well screen that is 4” Schedule 40 pipe with 0.010 slot size. The well will either be completed at ground surface and covered with a curb box or stick up if it is placed in a non-slab area. The exact location will be determined in the field by BE3 and the NYSDEC to gather sufficient groundwater data in the eastern portion of the Site. The anticipated location is shown in **Figure 1**. Drill cuttings will be placed on-site in unpaved areas unless non-native soil/fill or gross contamination (i.e., visible product) is encountered, in which case they will be placed in sealed NYSDOT-approved drums and labeled for subsequent characterization and disposal. Disposal will be done in accordance with all RCRA standards.

The subsequent well development and sampling procedures will be performed in accordance with the established guidance in the approved RIWP. The sample will be analyzed for the following Part 375 brownfield constituents:

- TCL VOCs plus CP-51 list VOCs and TICs;
- TCL SVOCs;
- TAL Metals + cyanide;
- PCBs;
- Pesticides;
- 1,4-dioxane; and
- Per & Polyfluoroalkyl Substances (PFAS).

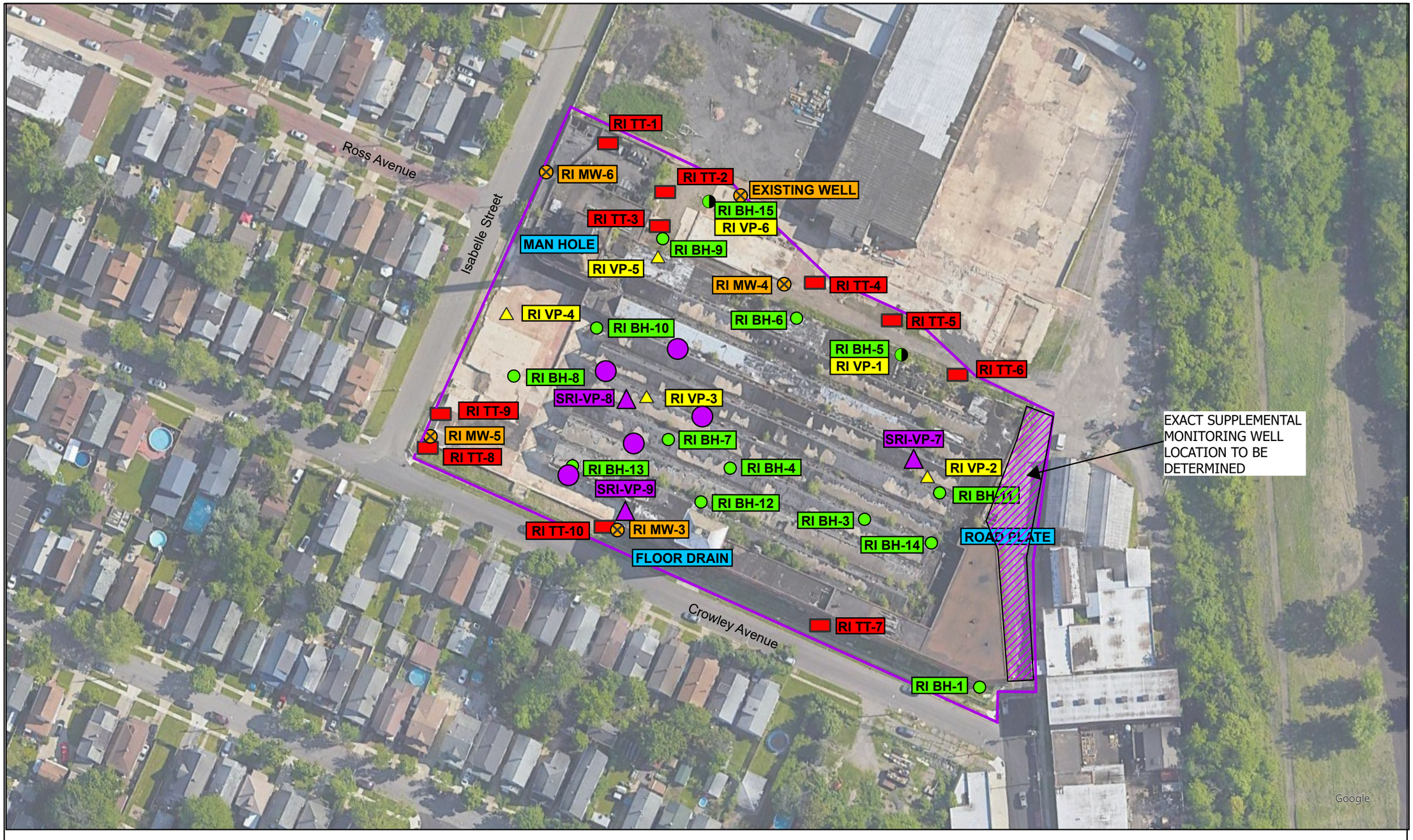
In addition, the existing four (4) monitoring wells (RI-MW-3 to RI-MW-6) installed during the RI will be re-sampled (one groundwater sample each plus appropriate QA/QC samples) in accordance with the RIWP Appendix C procedures/guidance. Each sample will be analyzed for 1,4 dioxane utilizing EPA Method 8270SIM.

Gamma Walkover Survey (GWS)

Several locations were noted to contain potential slag materials within the subsurface fill layer during the Phase II Environmental Site Assessment (ESA) and RI. Locations with observed slag included BH-2, BH-4, BH-5, BH-8 and BH-10 from the Phase II ESA and TT-9, TT-10, and BH-10 from the RI. Because of the significant number of locations, an exterior gamma walkover survey will be performed across the entire Site, as accessible, excluding concrete building slabs and other concrete hardscape areas. The gamma walkover survey will be performed per NYSDEC Division of Materials Management (DMM)-5 and include use of a gamma scintillation system comprised of a Ludlum 2221 meter with a 44-10 probe connected with geographic positioning system (GPS) technologies. Quality assurance and control procedures will be utilized throughout survey activities as is standard daily protocol (i.e., source checks, background conditions, etc.). All survey work will be completed under a decontamination and decommissioning (D&D) license as required by DMM-5.

Source checks of the equipment will be performed as is standard for BE3 GWS operations at the office with a 1 μCi/g cesium-137 button source using consistent geometry. Background gamma radiation conditions will be obtained proximate to the site on 'like' material. Surveyed materials that exhibit a reading of approximately 1.5 times background will be assessed in the field as to their nature and physical characteristics and, as applicable, will be presumptively determined to contain technologically enhanced naturally occurring radioactive material (TENORM). Areas determined to contain TENORM will be marked and subsequently sampled for radionuclide analysis (e.g., gamma spectroscopy and alpha spectroscopy – isotopic thorium and isotopic uranium) at a licensed and qualified laboratory (e.g., Eberline).

Final reporting will be generated and included with this overall addendum report and include site photos, field notes, QA/QC documentation, illustrated results with color coordination based upon background or total counts per minute gamma radiation.



LEGEND

- RI BH-1 — RI SOIL BORINGS
- RI TT-1 — RI TEST TRENCHES
- BCP SITE BOUNDARY
- RI VP-1 — RI VAPOR POINTS
- RI MW-1 — RI MONITORING WELLS
- FEATURE — ADDITIONAL FEATURES
- SUPPLEMENTAL RI MONTIORING WELL
- RI SUPPLEMENTAL VAPOR POINT
- RI SUPPLEMENTAL SOIL BORING
- RI BH-15 / RI VP-6 — BOREHOLE WITH INSTALLED VAPOR INJECTION POINT

BRYDGES ENGINEERING
IN ENVIRONMENT AND ENERGY, DPC

960 Busti Avenue
Buffalo, NY 14213
716.249.6880
jbrydges@be3corp.com

CLIENT: Douglas Development

Figure 1: SUPPLEMENTAL RI PLAN

308 Crowley Avenue
Buffalo, NY 14207

N W E S

DATE ISSUED:
March 5, 2025

0 0 0 0.010.010.02 Miles