

August 27, 2024

Mr. Michael Keller, EIT
Project Manager
NYS Department of Environmental Conservation
Division of Remediation, Region 9
700 Delaware Avenue
Buffalo NY 14209

Re: Request to Delineate SB-8 Area of Concern – Revised
2101 Kenmore Avenue Site
NYS BCP Site No. C915391
Tonawanda, New York

Dear Mr. Keller:

On behalf of our client, Wood and Brooks Properties LLC, Roux Environmental Engineering and Geology D.P.C. (Roux) has prepared this correspondence to request approval for further delineation of the “SB-8” Area of Concern (AOC) identified during the Brownfield Cleanup Program (BCP) investigation activities on the subject Site. This request is made with the goal of minimizing the need for future removal of the surrounding area of proposed asphalt binder that the Department has indicated is acceptable for placement for safety and building access reasons prior to Remedial Action Work Plan (RAWP) approval. We note that we are not requesting approval for removal of the SB-8 AOC soils at this time, but rather to help further characterize the horizontal and vertical extents of the impacts so our client can establish appropriate binder set-back distances.

SB-8 Location and Impacts

Figure 1 presents the approximate location of the SB-8 AOC. Remedial Investigation data for SB-8 are summarized on the attached Table 4 from the draft RI-AA report. As indicated, polycyclic aromatic hydrocarbons (PAHs) were identified at concentrations exceeding individual Soil Cleanup Objectives for Restricted Residential use as well as the CP-51 threshold of <500 mg/Kg total PAHs. Accordingly, the delineation work will be performed in an attempt to identify the limits of the PAH impacts.

Proposed Scope of Work

All field activities, including but not limited to: sample collection, documentation, packaging and transport for lab analysis and community air monitoring, will follow procedures contained in the approved Remedial Investigation Work Plan for the Site.

Notification

The Department will be provided 7-day advance notice of field activities. Work will not begin prior to that time unless approved in writing.

Community Air Monitoring

Community Air Monitoring will be conducted during intrusive activities. If elevated CAMP readings are detected, the Department will be contacted within 24-hrs with an explanation of the likely cause and the associated corrective actions completed. Although intrusive work is expected to take 1-2 business days, Roux will submit a weekly CAMP summary and monthly progress report to the Department.

Delineation Sampling

It is anticipated that PAH impacts associated with SB-8 extend the entire depth of the fill to approximately 5 feet below grade and are within an assumed area bounded by the 1-story building on the east and having dimensions of approximately 20 feet by 20 feet. The surrounding area is designated for asphalt (binder) paving as shown on Figure 2. Accordingly, samples will be collected at the frequency recommended in NYSDEC DER-10, paragraph 5.4(b)5.ii (2), which requires 1 sample per 30 lf of sidewall and one per 900 square feet of bottom area. Spoils will be placed on plastic sheeting for backfill in the same order as excavated following sampling. Test pits will be filled by the end of the workday.

At each sidewall location a sample will be hand collected along the lower half of the fill interval (4 samples total) using pre-cleaned stainless steel sampling equipment. Samples will also be collected from the native soil material within the two interior test pits using pre-cleaned stainless steel sampling equipment. The samples will be placed in laboratory-supplied sample jars for analysis of USEPA Target Compound List (TCL) semi-volatile organics (SVOCs) via Method 8270C. Additionally, all test pits spoils will be scanned for VOCs using a hand-held photoionization detector (PID). If elevated readings above 5 ppm are noted the corresponding samples will also be analyzed for TCL VOCs via USEPA Method 8260D.

In addition to these samples, the three sidewall test pits to the north, east and south will be stepped back 5 feet, and a second set of fill samples will be collected in a similar manner but held pending analysis of the first set of samples (it is assumed that the AOC extends to the building foundation to the east). In the event one or more of the original sidewall samples indicates elevated levels of PAHs suggesting the AOC extends beyond the 20' x 20' area, the corresponding step-out sidewall samples will be analyzed.

Sidewall and bottom sample test pit locations and proposed nomenclature are shown on Figure 1. Step-out test pits are designated with an "A" label.

Reporting

All samples will be sent to an NYSDOH-approved third party analytical laboratory under chain of custody command. Lab results will be reported with an equivalent Category B deliverables package. The results of the sampling will be summarized and presented to the Department upon receipt but will be formally presented in the Remedial Investigation/Alternatives Analysis Report.

Wood and Brooks Properties LLC and Roux appreciate the Department's continued cooperation and assistance with this project.

Please do not hesitate to let us know if you have any questions or require additional information.

August 27, 2024
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Sincerely,

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



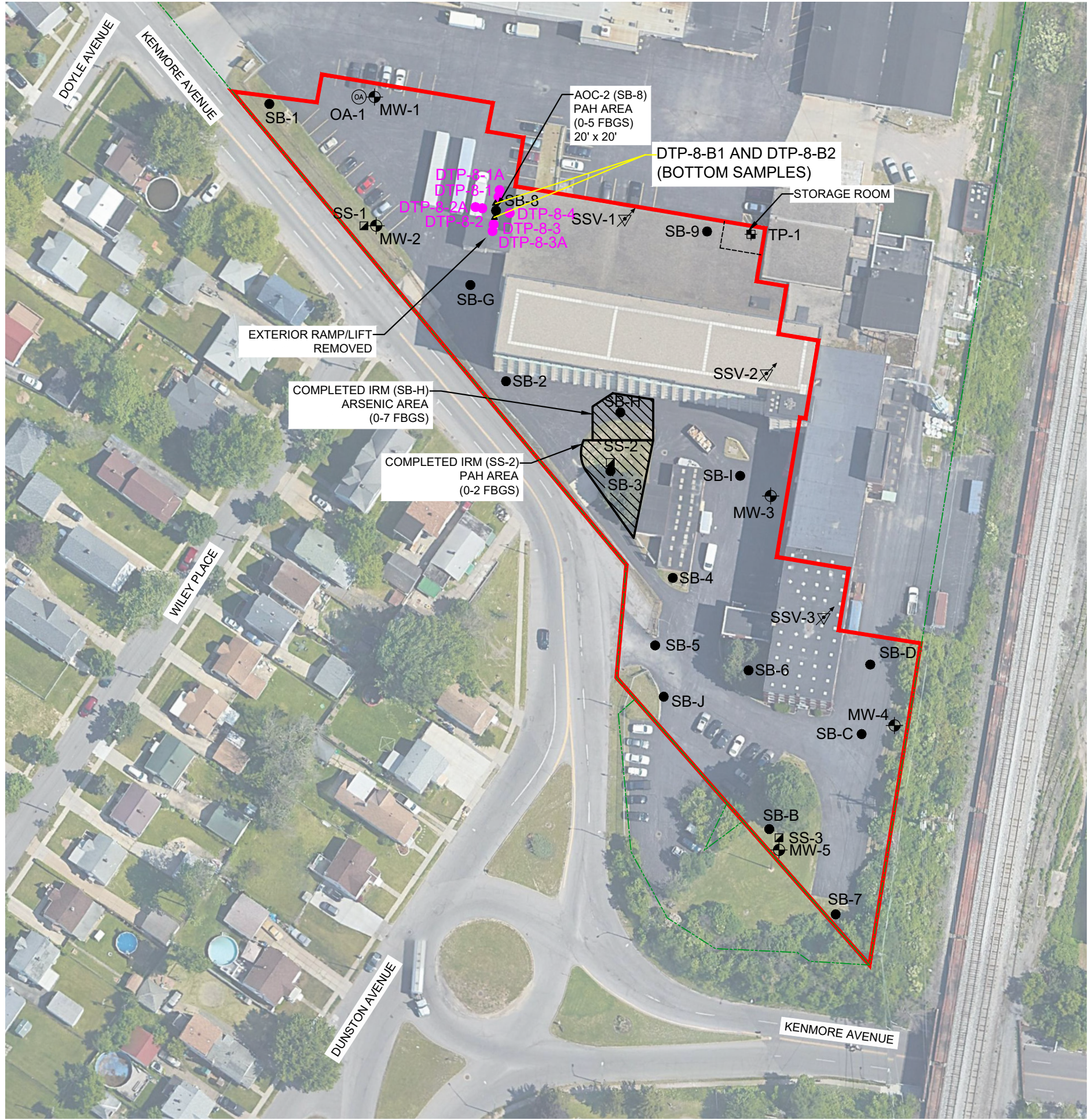
Thomas H. Forbes, P.E.
Vice President, Principal Engineer

Att.

e.c.,

S. Radon PG (NYSDEC)
A. Caprio (NYSDEC)
M. Wopperer (W&B)
N. Munley (Roux)

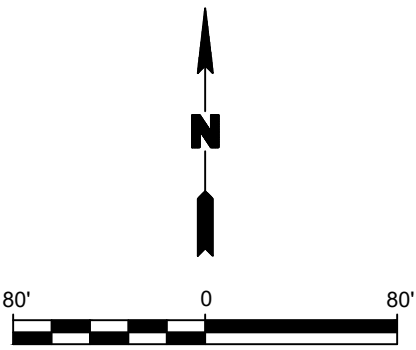
F:\CAD\BENCHMARK\FRONTIER INSULATION\RAW\FIGURE 7; PLANNED REMEDIAL EXCAVATION AREAS_DEC COMMENT REV1.DWG



LEGEND:

- BCP SITE BOUNDARY
- PARCEL BOUNDARY
- SB-B ● SOIL BORING (JULY 2021)
- MW-1 ● RI MONITORING WELL/SOIL BORING
- SB-1 ● RI SOIL BORING
- SS-1 ■ RI SURFACE SOIL SAMPLE
- SSV-1 ▽ RI SUBSLAB VAPOR SAMPLE
- OA-1 ○ RI OUTDOOR AIR SAMPLE
- TP-1 ■ RI TEST PIT
- DTP-8-1 ● PLANNED DELINEATION TEST PIT
- IRM EXCAVATION EXTENTS (PREVIOUSLY COMPLETED)

NOTE: FINAL EXCAVATION EXTENTS WILL BE BASED ON CONFIRMATORY SAMPLE RESULTS

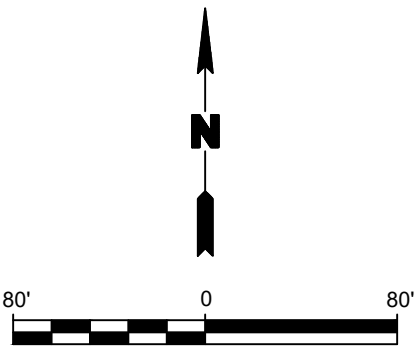


Title:
PLANNED REMEDIAL EXCAVATION AREAS
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK
SUPPLEMENTAL INVESTIGATION/REMEDIAL ACTION WORK PLAN

Prepared for:
WOOD AND BROOKS PROPERTIES LLC

ROUX	Compiled by: CMS	Date: JUNE 2024	FIGURE 1
	Prepared by: CMS	Scale: AS SHOWN	
	Project Mgr: NTM	Project: 4405.0001B000	
	File: FIGURE 7-PLANNED REMEDIAL EXCAVATION AREAS_DEC COMMENT REV1.DWG		

F:\CAD\BENCHMARK\FRONTIER INSULATION\RAW\FIGURE 2: ASPHALT PAVING PLAN_DEC COMMENT REV1.DWG



LEGEND:

- BCP SITE BOUNDARY
- PARCEL BOUNDARY
- PLANNED ASPHALT PAVING
- PLANNED CONCRETE SIDEWALK
- PLANNED CONCRETE CURBING

Title:

ASPHALT PAVING PLAN

2101 KENMORE AVENUE SITE

BCP SITE NO. C915391

TONAWANDA, NEW YORK

SUPPLEMENTAL INVESTIGATION/REMEDIAL ACTION WORK PLAN

Prepared for:

WOOD AND BROOKS PROPERTIES LLC

	Compiled by: CMS	Date: JUNE 2024	FIGURE 2
	Prepared by: CMS	Scale: AS SHOWN	
	Project Mgr: NTM	Project: 4405.0001B000	
	File: FIGURE 2: ASPHALT PAVING PLAN_DEC COMMENT REV1.DWG		



TABLE 4
SUMMARY OF RI SUBSURFACE SOIL/FILL SAMPLE ANALYTICAL RESULTS
REMEDIAL INVESTIGATION/ALTERNATIVES ANALYSIS REPORT
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

Parameter ¹	Protection of Groundwater Use SCOs ²	Unrestricted Use SCOs ²	Restricted Residential Use SCOs ²	Commercial Use SCOs ²	Industrial Use SCOs ²	Sample Locations														TP-1 (0.5-3 FT) 1/25/2024		
						SB-1 (0.5-3 FT)	SB-2 (0.5-2 FT) 8/28/2023	SB-3 (11-13 FT)	SB-4 (1-3 FT)	SB-5 (0.5-2 FT) 8/29/2023	SB-6 (1-3 FT)	SB-6 (3-3.5 FT)	SB-7 (2-3.5 FT) 8/28/2023	SB-8 (0.9-4 FT) 8/28/2023	SB-9 (1-3 FT) 9/5/2023	MW-1 (2-4 FT)	MW-1 (6-8 FT) 8/28/2023	MW-2 (2-4 FT)	MW-3 (3-5 FT)		MW-4 (2.5-4 FT) 8/28/2023	MW-5 (3-5 FT)
Sample Date																						
Volatile Organic Compounds (VOCs) - mg/Kg ³																						
1,2,4-Trimethylbenzene	3.6	3.6	52	190	380	ND	--	ND	--	ND	--	ND	ND	--	0.0007 J	ND	ND	ND	ND	--	ND	ND
1,3,5-Trimethylbenzene	8.4	8.4	52	190	380	ND	--	ND	--	ND	--	ND	ND	--	0.00084 J	ND	ND	ND	ND	--	ND	ND
2-Butanone (MEK)	0.12	0.12	100	500	1000	ND	--	ND	--	ND	--	ND	ND	--	ND	0.017 J	ND	ND	0.0024 J	--	ND	ND
Acetone	0.05	0.05	100	500	1000	ND	--	ND	--	ND	--	ND	ND	--	0.018	0.12	ND	ND	0.02	--	ND	ND
Carbon disulfide	--	--	--	--	--	--	--	ND	--	ND	--	ND	ND	--	ND	ND	ND	ND	ND	--	ND	0.05
Cyclohexane	--	--	--	--	--	0.0013 J	--	ND	--	ND	--	ND	ND	--	ND	ND	ND	ND	ND	--	ND	ND
Methyl tert butyl ether (MTBE)	0.93	0.93	100	500	1000	ND	--	0.074	--	ND	--	ND	ND	--	ND	ND	ND	ND	ND	--	ND	ND
Methylcyclohexane	--	--	--	--	--	0.001 J	--	ND	--	ND	--	ND	ND	--	0.001 J	0.0012 J	ND	ND	ND	--	ND	ND
Methylene chloride	0.05	0.05	100	500	1000	ND	--	ND	--	ND	--	ND	ND	--	ND	ND	ND	ND	ND	--	ND	ND
p-Isopropyltoluene	--	--	--	--	--	ND	--	ND	--	ND	--	ND	ND	--	0.00029 J	ND	ND	ND	ND	--	ND	ND
sec-Butylbenzene	11	11	100	500	1000	ND	--	ND	--	ND	--	ND	ND	--	0.00021 J	ND	ND	ND	ND	--	ND	ND
Toluene	0.7	0.7	100	500	1000	ND	--	0.00083 J	--	0.001 J	--	ND	ND	--	ND	0.0012 J	ND	ND	ND	--	ND	ND
Trichloroethene	0.47	0.47	21	200	1000	ND	--	--	--	--	--	ND	0.001	--	ND	ND	ND	ND	ND	--	0.00067	0.00079 J
Total VOCs	--	--	--	--	--	0.0023	--	0.07483	--	0.001	--	ND	0.001	--	0.02104	0.1394	0.001	ND	0.024	--	0.00067	0.05079
Total TICs	--	--	--	--	--	0.00458 J	--	ND	--	0.00386 J	--	0.0591 J	0.00381 J	--	0.3637 J	0.0117 J	ND	ND	ND	--	3.82 J	ND
Semi-Volatile Organic Compounds (SVOCs) - mg/kg ³																						
2-Methylnaphthalene	--	--	--	--	--	ND	0.061 J	ND	ND	0.21 J	0.11 J	ND	ND	ND	3.4 J	0.59	0.42	ND	ND	ND	ND	ND
Acenaphthene	98	20	100	500	1000	ND	0.054 J	ND	ND	0.024 J	ND	ND	ND	ND	12	ND	0.43	ND	ND	ND	ND	ND
Acenaphthylene	107	100	100	500	1000	ND	0.061 J	ND	ND	0.29	ND	ND	ND	0.18	4.5	0.097 J	0.21	ND	ND	ND	ND	ND
Acetophenone	--	--	--	--	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.037 J	ND	ND	ND	ND	ND
Anthracene	1000	100	100	500	1000	ND	0.28	ND	0.74 J	0.54	0.048 J	ND	0.072 J	ND	32	0.092 J	1.4	ND	ND	ND	ND	ND
Benzaldehyde	--	--	--	--	--	ND	ND	ND	ND	ND	ND	ND	0.067 J	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzo(a)anthracene	1	1	1	5.6	11	0.1 J	1.9	0.022 J	2.6	1.2	0.19	ND	0.32	49	0.097 J	3.5	ND	ND	ND	ND	ND	0.042 J
Benzo(a)pyrene	22	1	1	1	1.1	0.17	2	ND	ND	0.79	0.21	ND	0.46	47	0.057 J	3.4	ND	ND	ND	ND	ND	0.056 J
Benzo(b)fluoranthene	1.7	1	1	5.6	11	0.27	2.7	ND	ND	1.2	0.28	ND	0.55	56	0.11 J	3.6	ND	ND	ND	ND	ND	0.079 J
Benzo(ghi)perylene	1000	100	100	500	1000	0.16 J	1.6	ND	ND	0.42	0.14 J	ND	0.28	23	0.051 J	2.9	0.15	ND	ND	ND	ND	0.053 J
Benzo(k)fluoranthene	1.7	0.8	3.9	56	110	0.071 J	1	ND	ND	0.33	0.084 J	ND	0.19	16	ND	1.4	ND	ND	ND	ND	ND	ND
Biphenyl	--	--	--	--	--	--	--	ND	ND	0.08 J	ND	ND	ND	ND	1.2 J	0.12 J	0.099 J	ND	ND	ND	ND	ND
Bis(2-ethylhexyl) phthalate	--	--	--	--	--	--	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbazole	--	--	--	--	--	--	--	0.023 J	0.25	0.021 J	ND	ND	0.39	0.036 J	ND	ND	0.72	ND	ND	ND	ND	ND
Chrysene	1	1	3.9	56	110	0.19	1.9	ND	2.7	1.1	0.26	ND	0.32	47	0.32	3.4	ND	ND	ND	ND	ND	0.054 J
Dibenzo(a,h)anthracene	1000	0.33	0.33	0.56	1.1	0.029 J	0.36	ND	0.029 J	0.16	0.032 J	ND	0.075 J	6	ND	0.61	ND	ND	ND	ND	ND	ND
Dibenzofuran	210	7	59	350	1000	ND	0.04 J	ND	ND	0.34	0.035 J	ND	ND	9.6	0.17 J	0.6	ND	ND	ND	ND	ND	ND
Fluoranthene	1000	100	100	500	1000	0.43	3.9	0.061 J	0.74 J	2.4	0.45	ND	0.37	120	0.26	7.7	ND	ND	0.047 J	ND	ND	0.084 J
Fluorene	386	30	100	500	1000	ND	0.047 J	0.024 J	0.024 J	0.052 J	0.024 J	ND	ND	16	0.084 J	0.55	ND	ND	ND	ND	ND	ND
Indeno(1,2,3-cd)pyrene	8.2	0.5	0.5	5.6	11	0.13 J	1.6	ND	ND	0.51	0.14 J	ND	0.32	27	0.029 J	2.3	0.057 J	ND	ND	ND	ND	0.046 J
Naphthalene	12	12	100	500	1000	ND	0.052 J	ND	ND	0.23	0.039 J	ND	0.057 J	6.2	4	0.33	ND	ND	ND	ND	ND	ND
Phenanthrene	1000	100	100	500	1000	0.16	1.3	0.056 J	1.2	2.4	0.34 J	ND	0.11 J	120	0.64	5.8	ND	ND	0.036 J	ND	ND	0.053 J
Pyrene	1000	100	100	500	1000	0.32	3.4	0.048 J	3.4	1.7	0.36	ND	0.31	96	0.21	6.3	ND	ND	0.035 J	ND	ND	0.074 J
Total PAHs	--	--	--	--	--	0.27	4.234	0.022	3.34	2.554	2.597	ND	3.614	677.7	6.047	43.83	0.207	ND	0.118	ND	ND	0.541
Total SVOCs	--	--	--	--	--	2.053	22.505	0.208	11.38	14.346	2.915	ND	3.614	705.9	6.927	45.706	0.207	ND	0.118	ND	ND	0.541
Total TICs	--	--	--	--	--	ND	2.12 J	ND	181 J	5.62 J	5.98 J	1.09 J	1.16 J	190 J	6.75 J	9.17 J	ND	ND	ND	ND	ND	ND
Metals - mg/kg																						
Aluminum	--	--	--	--	--	3620	29900	10400	33500	22300	7630	--	7150	9280	2830	--	11000	15400	10500	19200	11300	11300
Antimony	--	--	--	--	--	1.43 J	0.769 J	ND	0.626 J	ND	0.793 J	--	--	3.86 J	ND	--	0.473 J	ND	ND	0.945 J	0.503 J	0.832 J
Arsenic	16	13	16	16	16	6.08	2.46	2.47	6.88	1.24	8.49	--	4.53	6.91	8.18	--	2.7	3.09	2.68	3.74	3.94	10.2
Barium	820	350	400	400	10000	39.9	190	83.2	276	119	72.3	--	68.6	157	50.5	--	84.5	114	93.9	200	107	131
Beryllium	47	7.2	72	590	2700	0.256 J	4.02	0.348 J	11	4.03	1.23	--	0.468 J	0.583	0.463	--	0.397 J	0.624	0.551	1.02	0.566	0.761
Cadmium	7.5	2.5	4.3	9.3	60	0.212 J	ND	ND	ND	0.252 J	ND	--	0.519 J	0.803 J	1.46	--	ND	0.624	0.139 J	0.13 J	ND	0.407 J
Calcium	--	--	--	--	--	108000	178000	68100	243000	151000	7970	--	6030	119000	4150	--	72000	40300	51300	3340	65200	40700
Chromium	--	30	180	1500	6800	17.3	8.45	17.4	10.4	2.88	12.5	--	13	18.1	5.77	--	17.9	22.4	16.4	25.8	18.2	17.1
Cobalt	--	--	--	--	--	4.61	ND	11.4	ND	15.4	ND	--	4.08	5.94	2.38	--	11	10.5	8.41	12.3	8.57	9.22
Copper	1720	50	270	270	10000	136	26.5	20.4	3.03	1.14	25.8	--	22.2	232	19.9	--	20.2	21.4	12.2	12.4	16.5	22.7
Iron	--	--	--	--	--	34400	19600	20000	1800	2310	18200	--	11900	19700	31100	--	21100	25000	17900	28700	20100	21400
Lead	450	63	400	1000	3900	104	113	10.9	1.66 J	0.335 J	21.5	--	62.4	235	14.2	--	10.1	10.3	8.65	11.6	10.9	28.3
Magnesium	--	--	--	--	--	16700	5700	20000	14100	7090	3290	--	1940	14700	454	--	16600	13500	12200	6120	15200	11700
Manganese	2000	1600	2000	10000	10000	470	1970	523	3180	2640	264	--	227	768	82.2	--	521	409	429	342	492	351
Mercury	0.73	0.18	0.81	2.8	5.7	0.136	0.123	0.088	ND	ND	0.11.											