

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 9
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March 24, 2022

Ken Kearney
The Kearny Reality & Development Group Inc.
57 US Route 6, Suite 207
Baldwin Place NY, 10505

**Re: Harrison Place Site, #C932177
Lockport, Niagara County
Remedial Investigation Work Plan Addendum**

Dear Ken Kearney,

The New York State Department of Environmental Conservation (the Department) has reviewed the *Remedial Investigation Work Plan Addendum* provided by BE3 Corp Brydges Engineering in Environment and Energy on March 16, 2022. The following comments were provided via email on March 17 and 18, 2022. These comments need to be addressed prior to the implementation of the work plan.

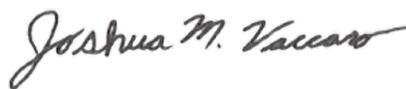
- **Section 3.0 – Additional groundwater Monitoring Wells:** The text provided in the February 7, 2022 summary and February 22, 2022 work plan is inconsistent with the most recent scope provided in the March 16, 2022 work plan. Text provided below:
 - February 7, 2022 WP Summary:** *“During the installation of each well a minimum of one sample will be collected from the saturated aquifer soils between approximately 12 to 25 feet below ground surface”*
 - February 22, 2022 work plan:** *“During the installation of each well a minimum of one soil sample will be collected from the saturated aquifer soils at approximately 10 to 12 feet bgs. Depending on the contamination profile observed during well installation, additional soil samples may be collected from the unsaturated zone to further characterized the site soils.”*
 - March 16, 2022 work plan:** *“During the installation of each interior overburden well a minimum of one soil sample will be collected from the saturated aquifer soils at approximately 10 to 12 feet bgs. Depending on the contamination profile observed during well installation, additional soil samples may be collected from the unsaturated zone based on PID/visual/olfactory screening to confirm clean soils or further characterized impacted soils.”*

A minimum of one sample should be collected from the saturated aquifer soils for each of the installed wells/borings (interior and exterior locations). All well locations/borings should be completed and profiled from ground surface to bedrock. Additional samples should be collected whenever PID readings or field indicators/odors warrant, this includes both the saturated or unsaturated zones.

- **Section 3.1 – Overburden Monitoring Wells:** It is the Departments understanding that all borings will be completed to bedrock. The work plan states “All overburden monitoring wells will be installed to approximately 10 to 15 feet bgs or top of bedrock.” Please clarify how soil borings will be backfilled at well locations where the bottom of the well screened will be installed above top of bedrock. Alternatively, overburden well screens could be installed through the entire saturated zone to the top of bedrock.

Please submit a revised Remedial Investigation Work Plan Addendum to the Department. These comments must be addressed before the Work Plan Addendum can be approved. If you have any questions regarding the matters above, please feel free to contact me at joshua.vaccaro@dec.ny.gov or (716) 541-9657.

Sincerely,



Joshua M. Vaccaro
Assistant Engineer

ec:

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Benjamin McPherson – NYSDEC
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