



April 3, 2025

Michael J. Keller, E.I.T.
Project Manager
Division of Environmental Remediation
New York State Department of Environmental Conservation
700 Delaware Ave., Buffalo, NY 14209
P: (716) 851-7218
michael.keller@dec.ny.gov

Re: Proposal – Supplement RIWP – NEST BCP Project C932183

Mike:

This proposal is to address comments regarding the Remedial Investigation for the Nest BCP Project. DEC and DOH are requesting these additional samples after reviewing the RI results and concluding that a decision of Significant Threat cannot be determined because of the unknown source location and migration pathway of the VOCs found in soil vapor and groundwater. A dry cleaner was formerly operating out of what is currently the northern parking lot located off-site. To fulfil the requirement of the Qualitative Exposure Assessment, the required additional data is needed to determine if this area is a potential source of contaminants migrating through the site and onto neighboring occupied properties. After collecting these samples, the DEC and DOH should be able to determine if the site is or is not a Significant Threat, then a Decision Document can be finalized and issued.

See **attached figure** for proposed sample location based upon DEC and DOH's suggestions, and read below about the proposed additional remedial investigation efforts:

1. One offsite GW well will be installed at the attached location to the north of the project site. This well is anticipated to also be a bedrock well based upon local subsurface conditions. As such, installation will follow the previously approved RIWP Section 4.3 and associated procedures with a steel casing approximately 2' into bedrock. Based on information obtained during the RIWP, this well will be installed to a depth of approximately 30 feet bgs using core drilling. A Core log will be generated and submitted to the DEC for review. Analysis of the GW will include TCL VOCs, SVOCs, and PFAS.
2. Two proximate vapor points will be installed at the attached locations to the north immediately adjacent to the parking lot and to the south immediately adjacent to the church. These points are anticipated to be installed similarly to previous vapor points and will follow previously approved RIWP Section 4.4 and associated procedures with proposed depths of approximately 5 feet bgs (or 1 foot above bedrock whichever is shallower) equivalent to foundation depths.
3. Four on-site soil samples will be collected beneath the concrete slab proximate to the 2 floor drains. These samples will be analyzed for TCL VOCs, SVOCs, and metals. Twelve on-site soil samples will be collected beneath the concrete slab at the locations indicated



on the **attached figure**. These samples will be analyzed for the recipient facility waste acceptance criteria. All sixteen soil samples will be collected after removing small areas of concrete via the excavator with appropriate attachment. All concrete will be placed back into the area from which it was removed after soil sampling. All soil will be sampled using procedures outlined in the previously approved RIWP.

All information regarding the offsite groundwater well and vapor probes will be included in a separate report and provided to the DEC and DOH for review. All information regarding the sixteen total additional on-site soil samples will be included in the revised RI/AAR.

Both the Community Air Monitoring Plan (CAMP) and the fugitive dust and particulate monitoring program will be administered by the environmental engineer/consultant. Monitoring results of the CAMP will be reported to the New York State Department of Health for Daily review.

Your acceptance of this proposal may be indicated by signing this proposal or providing an NTP via email.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason M. Brydges'.

Jason M. Brydges, PE
President

Name

Signature

Date



LEGEND

- Property Boundary
- Floor Drain
- Disposal Sampling Location
- Characterization + Disposal Location
- ⊕ Off-Site Well Location
- ▲ Vapor Point Location

BE3
BRYDGES
ENGINEERING
IN ENVIRONMENT
AND ENERGY, DPC

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

PROPOSED SAMPLE LOCATIONS
SUPPLEMENTAL RIWP
NEST BCP PROJECT C932183
333 1st Street
Niagara Falls, NY 14303



DATE ISSUED:
April 1, 2025

SCALE: 1:1,000