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FINAL GENERIC ENVIRONMENTAL IMPACT STATEMENT FOR THE MAIN-LASALLE REVITALIZATION PROJECT

City of Buffalo, Erie County, New York

June 1998

Prepared for:

Buffalo Department of Community Development
Division of Planning
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Buffalo, New York 14202
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Date of acceptance by lead agency: June 12, 1998

Date by which comments must be submitted: June 22, 1998

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EXECUTIVE SUMMARY AND REPORT ORGANIZATION

SUMMARY

This is the Final Generic Environmental Impact Statement ("FGEIS" or "Final GEIS") for the Main-LaSalle Revitalization Project, which is proposed for location on a 110-acre area in the northeastern part of the City of Buffalo, Erie County, New York. The FGEIS updates and incorporates by reference the Draft Generic Environmental Impact Statement ("DGEIS" or "Draft GEIS") for the project, and includes responses to the written and oral comments that were submitted concerning it.

The FGEIS has been prepared as part of the Main-LaSalle Revitalization Project environmental review process, in accordance with the requirements of the New York State Environmental Quality Review Act (SEQRA). It is intended for use in conjunction with the DGEIS and incorporates that document by reference. The SEQRA process is designed to assess both the positive and negative impacts of a project, and to assure that the potentially significant adverse environmental and economic impacts of a project are identified, mitigated to the extent possible, and weighed against the potential benefits so that a determination of the appropriateness of the project can be made.

The DGEIS and FGEIS for the Main-LaSalle project consider and address the broad-based actions that the city proposes to undertake as part of the revitalization effort. Such actions at the Main-LaSalle site include the adoption of the site master plan and design guidelines, soil remediation, and infrastructure developments, and certain publicly funded activities.

After the completion of these activities, future private developers or public agencies are expected to undertake additional aspects of the site revitalization effort. Such actions will require separate environmental review and approval, as warranted by the scope of the specific activity.

As described in the FGEIS and the DGEIS, the Main-LaSalle Revitalization Project is expected to result in long-term benefits in terms of land use improvements, economic redevelopment, public health and safety, and community character and aesthetics. These positive project attributes will outweigh the short-term negative impacts that will occur during the implementation of site preparation and construction activities.

REPORT ORGANIZATION

The FGEIS is organized into three major sections, plus references. Section 1 provides a brief summary of the Main-LaSalle Revitalization Project, including the primary project objectives, and describes the status of the environmental review process pursuant to SEQRA. Section 1 also reviews the additional approvals, apart from SEQRA, that will be required for the project.

Section 2 summarizes and responds to the written and oral comments received concerning the DGEIS. Comments and responses are generally grouped by topic, and reference both the relevant section of the DGEIS and the name of the commenter. Section 3 summarizes the environmental impacts expected to occur as a result of the Main-LaSalle project, and identifies the measures to be implemented to mitigate or avert significant adverse environmental effects. Section 4 presents the references for the FGEIS.

Appendices include data pertaining to the public notice for the DGEIS, copies of the comments received concerning the DGEIS, and data concerning the results of a site investigation recently made available for a parcel within the Main-LaSalle revitalization project area..

1. PROJECT BACKGROUND

1.1 SUMMARY PROJECT DESCRIPTION AND OBJECTIVES

The primary objective of the proposed Main-LaSalle Revitalization Project is to promote the economic redevelopment of an approximately 110-acre area (i.e., the Main-LaSalle site) within which urban lands are currently either under-utilized or vacant. To achieve this objective, the City of Buffalo, Department of Community Development (DCD) proposes to implement a revitalization plan and to amend zoning classifications in the Main-LaSalle Revitalization Project area. The City also proposes to assist directly in the revitalization effort by performing certain site preparation and infrastructure development activities, and by expanding on-site recreational and educational uses.

To define appropriate revitalization uses on the site, the City commissioned the preparation of a site land use plan (the *Final Concept Master Plan*) and site design guidelines, both prepared by DeLeuw Cather et al. (1998). Specific components of the revitalization master plan call for the redevelopment of the site for residential (single-family detached housing, single-family townhouse, multi-story apartment/condominiums) and commercial uses, and for the expansion of existing recreational, transit, and educational facilities. A new greenway trail also is planned for development along a former railroad corridor that bisects the Main-LaSalle site.

The Main-LaSalle Revitalization Project site straddles Main Street (New York State Route 5) in the northeastern part of the city. The central part of the project area located south of Main Street was used as a quarry during the first half of the 20th century. In the 1950s to 1970s, most of the former quarry was filled with a variety of materials. Testing and analyses to determine the location of the former quarry walls and to assess the location and composition of the fill materials were key components of the City of Buffalo's planning for the Main-LaSalle Revitalization Project.

The Main-LaSalle site currently encompasses both publicly- and privately-owned parcels and is characterized by a mix of land uses, including vacant lots, scattered residential properties, municipal recreational uses (McCarthy Park), commercial activities, educational facilities (Bennett High School), and the LaSalle Station transit area. In the project vicinity, residential neighborhoods are the predominant land use, with commercial and transit activities concentrated along Main Street. The proposed site is the largest tract of underdeveloped land available in North Buffalo and, as such, is particularly well-suited for a mixed land use revitalization program. Its proximity to the LaSalle Street mass transit station also facilitates future efforts to promote the use of public transportation.

The city's proposed actions will result, either directly or indirectly, in the revitalization of the Main-LaSalle project area for various residential, commercial/retail, recreational, multi-modal transportation, and educational purposes. The redevelopment will be in accordance with the *Final Concept Master Plan*, which reflects the input of various public interest groups, citizens, and government agencies, as well as with specific design requirements that have been identified for the Main-LaSalle project area.

To accomplish the Main-LaSalle redevelopment, in addition to adopting the *Final Concept Master Plan* and design requirements for the site, the City of Buffalo proposes to:

- Acquire (purchase) selected private properties within the project area;
- Perform pre-construction soil testing and site rehabilitation/remediation; and
- Conduct site work required to prepare the area for redevelopment, including clearing and demolition, earth moving, and the installation of public facilities/improvements and infrastructure.

The new residential and retail/commercial development on the project site, the expanded recreational facilities at McCarthy Park and along the former rail corridor greenway, and the potential for expanded educational facilities at and adjacent to Bennett High School, are designed to create an economic stimulus as people are drawn to the area to live, work, shop, and pursue recreational/educational activities. The Main-LaSalle project also is viewed as a cornerstone in the revitalization of the North Buffalo area as a whole, and is designed to reunite neighborhoods and stimulate economic growth throughout the adjoining communities.

The revitalization of the Main-LaSalle site, including the proposed development of a trail system along the former railroad right-of-way, also is consistent with the Buffalo Greenways Master Plan, which advocates the creation of connections that extend green space into new areas of the city. In addition, the proposed project meets the general planning objectives of the federal government, as defined in recent initiatives to revitalize and adaptively reuse properties on which perceived or real contamination has posed limitations to productive utilization.

1.2 ENVIRONMENTAL REVIEW PROCESS

In accordance with SEQRA, the DGEIS was officially accepted by the DCD (the SEQRA lead agency) and filed on April 27, 1998. A combined notice of completion of the DGEIS and notice of public hearing concerning the document was published in *The Buffalo News* on April 29, 1998. A The DGEIS, along with a copy of the public notice, were distributed for review to the public and to the specific agencies listed in Table 1-1. Copies of the public notice also were provided to various additional agencies, groups, and landowners with potential interests in the Main-LaSalle project: a list of these interested parties is attached to the public notice that is included in Appendix A.

Table 1-1
Distribution List for Draft GEIS and Public Notice

- City of Buffalo, Honorable Anthony M. Masiello, Mayor
- Buffalo Urban Renewal Agency (BURA), Anthony M. Masiello, Chairman
- City of Buffalo, Common Council
- Buffalo Sewer Authority (BSA), Anthony Hazzan, General Manager
- City of Buffalo, Department of Public Works, Joseph Giambra, Commissioner
- Niagara Frontier Transportation Authority (NFTA), Richard Swist, Director
- Erie County Department of Environment and Planning, Richard Tobe, Commissioner
- New York State Department of Environmental Conservation, Commissioner, Regional Director
- New York State Office of Parks, Recreation and Historic Preservation, Ruth L. Pierpont, Director, Historic Preservation Field Services
- New York State Department of Transportation, Robert J. Russell, Regional Director
- Buffalo Water Authority, Joseph Giambra, Chairman
- Erie County Health Department, Arnold N. Lubin, M.D., Commissioner
- Erie County Water Authority
- Buffalo Fire Department, Cornelius Keane, Commissioner
- Buffalo Police Department, Gil Kerlikowske, Commissioner
- City Planning Board, S. Theodore Berg, Chairman
- Buffalo Law Department, Corporation Counsel Michael Risman
- Niagara Frontier Transportation Committee, Edward Small, Staff Director
- Buffalo Comptroller, Joel A. Giambra
- New York State Department of Education
- Buffalo Board of Education, Mrs. Marlies A. Wesolowski, President
- State University of New York
- Buffalo Parks Department
- New York State Department of Health

Copies of the DGEIS also were available for general review at the Buffalo and Erie County Public Library, Lafayette Square, Buffalo, New York, and at the offices of the DCD, Division of Planning at 901 City Hall, Buffalo, New York.

In accordance with SEQRA, both oral and written comments on the DGEIS were solicited. A duly noticed public hearing concerning the Main-LaSalle DGEIS was held on May 14, 1998, from 3:00 p.m. to 5:00 p.m. in Room 901 City Hall, Buffalo, New York, 14202. A tape recording of the public hearing was made and is available for review at DCD.

Appendix A includes a copy of the public hearing notice (which also serves as the notice of completion of the DGEIS), along with a copy of the attendance list from the hearing. No written comments were submitted at the hearing.

The time period for acceptance of other comments on the Main-LaSalle DGEIS extended from April 27, 1998 through 4:00 p.m. on May 29, 1998. Written comments submitted during this period are reproduced in Appendix B.

1.3 SUMMARY OF REQUIRED PROJECT APPROVALS

The adoption of the Main-LaSalle Revitalization Project *Final Concept Master Plan* and the subsequent implementation of the project will require certain approvals or permits from city, state, and federal agencies. The permits and approvals expected to be required for project development are listed in Table 1-2 and summarized below.

The primary approval required for the Main-LaSalle Revitalization Project is the approval by the Buffalo Common Council of the proposed zoning amendments and the release of City Capital Budget Funds to complete the City-funded portions of the project..

In addition, several state approvals or consultations are required for the project. The New York State Historic Preservation Office (SHPO) must be consulted as an advisory council to determine whether the project will significantly impact archaeological or historic resources, pursuant to the National Historic Preservation Act of 1966, due to the use of federal HUD funding for portions of the project. A Voluntary Cleanup Agreement (VCA) between the City of Buffalo and NYSDEC, which is also acceptable to the New York State Department of Health (NYSDOH), must be approved before soil remediation can proceed. This VCA is identified as a project mitigation measure in the DGEIS and, when finalized, will be noticed for a 30-day public comment period.

New York State Assembly approval of the expansion of McCarthy Park also may be required. However, it is currently unclear as to whether Assembly approval is required only for the conversion of existing parks to other uses, or for any change to a park's configuration, regardless of whether the park increases or decreases in total acreage. In addition, New York State Department of Education approval will be required for potential future school renovations or construction.

No federal permits are required for the project to proceed. However, because the City is requesting HUD Community Development Block Grant (CDBG) funds for a portion of the project, an environmental review pursuant to the National Environmental Policy Act (NEPA) must be performed

Table 1-2

PERMITS AND APPROVALS REQUIRED FOR THE MAIN-LASALLE REVITALIZATION PROJECT

Agency	Description of Permit or Approval Required*
Local/Regional	
• Common Council	- Approval of amendments to zoning designations - Approval of City funding arrangements
• Department of Community Development	- SEQRA approval (as Lead Agency) - Voluntary Cleanup Agreement and Soils Management Plan - Capital budget funding - Building permits
• Buffalo Urban Renewal Agency	- Site Plan and City funding arrangements - NEPA compliance
• Buffalo Planning Board	- Site plan and subdivision designs - Transit Station Site Plan review
• Buffalo Division of Water	- Water line connections; water tower/pumping facility design
• Buffalo Sewer Authority	- Storm and sanitary sewer connections
• Buffalo Department of Public Works	- Road design for the project
• Buffalo Parks Department	- McCarthy Park design approval
• Buffalo Board of Education	- Future school construction/renovation design approval
• Erie County Health Department	- Water line connections
• Erie County Water Authority	- Interconnections Permit for water lines
• NFTA	- Transit Station Site Plan approval
State	
• Department of Environmental Conservation/Department of Health	- Voluntary Cleanup Agreement and Soils Management Plan approval
• Department of Education	- Future school construction/renovation design approval
• State University of New York	- Approval of developments which may affect Bethune Hall
Federal	
• Department of Housing and Urban Development (HUD)	- Approval pursuant to National Environmental Policy Act (NEPA) for use of HUD funding

*Note: The specific permits and approvals required, particularly for future, as yet undetermined types of private development, will be a function of the characteristics of the specific activity. Additional permits may be involved.

for the entire scope of the redevelopment plan. The BURA is responsible for compliance with all HUD environmental review requirements.

Several local or regional permits/approvals also will be required for the project. Depending on the activity involved, these permits will be obtained by the city, private developers, or other public agencies (e.g., NFTA, Buffalo Board of Education). Local building permits, sewer permits, water line interconnection permits, and road permits will have to be obtained for various activities undertaken by the city (e.g., soil remediation, clearing/demolition, grading, infrastructure and park/greenway facility construction), as well as by the private developers and other public agencies which ultimately construct the residential, educational, transit, and commercial structures proposed for the site.

Approvals from the Erie County Health Department (ECHD) and Erie County Water Authority will be required for the water lines and water tower/pumping station proposed as infrastructure developments for the site. The Buffalo Sewer Authority has sole responsibility for the design approval and construction of sanitary and storm sewer systems in the City of Buffalo and, consequently, no state or federal stormwater control permits are required for the project.

2. RESPONSES TO COMMENTS RECEIVED CONCERNING THE DRAFT GENERIC ENVIRONMENTAL IMPACT STATEMENT

The following provide responses to the oral and written comments received concerning the DGEIS. Comments are grouped and addressed by topic.

Three oral comments on the DGEIS were received. Two oral comments were provided via telephone to DCD, while one commenter spoke at the public hearing. These oral comments are summarized and addressed, reproducing the responses of DCD. Copies of written comments on the DGEIS are included in Appendix B. Table 2-1 provides an index to the comments and responses.

2.1 GENERAL QUESTIONS ABOUT THE MAIN-LASALLE PROJECT

At the public hearing, a property owner in the project area (Mr. Robert Lewis, Ellicott Lanes, 325 Manhattan Street) asked various questions about the Main-LaSalle revitalization effort in general, along with specific questions about the potential effects of the project on his property. The general project questions and responses are reproduced in this section, whereas the responses to the questions regarding the potential property-specific effects of the project are described in Section 2.2.

The general project questions and responses provided by city representatives are summarized below.

Question:

What are the elements of the project and what is the general phasing plan for the project?

Response:

The objectives of the project were described, including the land use revitalization, mixed use development goals, and remediation of soil contamination caused by the historical filling of the former quarry. The planned locations of residential areas, commercial uses, roads, recreational facilities, and the potential educational facilities also were discussed. The different phases of the project, as discussed in Section 1 of the DGEIS, was summarized, as were the plans for soil remediation, as described in the DGEIS and in the *Soils Management Plan*.

Table 2-1

Index to Comments and Responses on the DGEIS

Commenter	Principal Subject(s) of Commentary	Comment Responses (FGEIS Section Number)
Oral Comments		
• R. & S. Bostoph	- Plans for property acquisition	2.2
• Keystone Corporation	- Plans for property acquisition	2.2
• Ellicott Lanes, Inc. (Robert Lewis)	- Potential impacts to property - Sources of loans for property improvements - Plans for property acquisition	2.1, 2.2
Written Comments		
• New York SHPO	- Archaeological and historic resources	2.4
• Erie County Water Authority	- No comments or input	N/A
• Niagara Mohawk Power Corporation	- Role of Niagara Mohawk in providing power to project site - Adequacy of existing electrical distribution system to serve revitalization site	2.3
• NYDEC, Region 9*	- Soil remediation options - Discussion of VCA and SEQRA review - Reference to VCA in DGEIS Appendix C - Classification of water quality of Buffalo River - Groundwater data from BSA and NYSDEC studies - SEQRA review process procedures	2.7 2.7 2.7 2.5 2.5 2.6

* Includes oral comments from June 8, 1998 meeting between DCD and NYSDEC.

Question:

How will the project affect McCarthy Park?

Response:

The plans identified for the expansion of the park were described, along with the proposed greenway trail along the former railroad corridor.

Question:

What will happen to the coal/dirt piles that are located near the former rail line?

Response:

The existing piles of dirt/coal and debris that characterize portions of the undeveloped areas on the Main-LaSalle site will be removed during the site redevelopment. The area will be recontoured in accordance with the specifications of the *Final Concept Master Plan*.

2.2 PROPERTY OWNERSHIP/LAND ACQUISITION

Three parties submitted oral comments to DCD (two via telephone and one at the public hearing on the DGEIS) regarding the potential impacts of the Main-LaSalle Revitalization Project on their individual properties. Each was concerned primarily about whether his/her property was slated for acquisition or other disposition under the revitalization plan. One of the property owners also inquired about the sources of assistance for renovating his property. The three parties commenting (and their addresses) included:

- Ellicott Lanes, Inc., 325 Manhattan Street;
- Keystone Corporation, 2929 and 2939 Main Street; and
- R. and S. Bostoph, 25 LaSalle Avenue.

The following discussion responds to the general comments about property, as well as to the specific questions raised concerning possible sources of funding for property improvements.

General Responses to Comments on Property Acquisition and Land Ownership

Each of these parcels is located within the general Main-LaSalle project area. However, none are presently proposed for acquisition by the city or for any other type of direct redevelopment activity. The aspects of the Main-LaSalle project to be undertaken by the City of Buffalo DCD will not directly affect any of these properties.

However, it is possible that future phases of the Main-LaSalle revitalization could affect these properties. For example, after the city amends the zoning in the area to incorporate the Main-LaSalle

design guidelines (reproduced as Appendix A of the DGEIS), such criteria will apply to exterior modifications planned for public or private properties in the site area, and also will affect the visual appearance of local streetscapes.

In addition, as the redevelopment of the Main-LaSalle site proceeds, private developers or municipal agencies involved with the revitalization of the area could be interested in acquiring one or more of these properties as part of their redevelopment plans. For instance, the potential future expansion of educational facilities within the Main-LaSalle project area could affect the Ellicott Lanes property -- either directly (depending on the final design of and land required for a new school) or indirectly (through increases in school-related traffic and pedestrian movement patterns). However, because plans for the future educational facilities at the Main-LaSalle site currently are uncertain, the potential impacts of such educational developments on the Ellicott Lanes or other properties will have to be identified and assessed in conjunction with the Buffalo Board of Education's submittal of specific plans and requests for environmental and other reviews. Furthermore, if private developers or public entities determine in the future that privately-owned land is needed for the implementation of a specific project on the Main-LaSalle site, the procedures and requirements appropriate to the particular property acquisition will have to be applied.

Sources of Potential Funding for Property Improvements and Property Sales Information

One property owner (Ellicott Lanes) inquired about possible sources of funding assistance for private property renovation and about the procedures for property sales to the city. DCD representatives directed the landowner to the following municipal agencies for additional information:

- BURA, which administers community development block grant loans;
- BURA real estate division, for responses to questions concerning procedures for future property acquisition by BURA;
- BEDC, which administers commercial loans; and
- Buffalo Board of Education, for information regarding future school expansion plans at the Main-LaSalle site.

2.3 PUBLIC UTILITIES/ENERGY SUPPLY

Niagara Mohawk Power Corporation (NM) submitted two comments to DCD regarding electric utility construction and service in a letter dated May 29, 1998 (refer to Appendix B). The comments are reproduced in italics below for ease of reference, followed by the response of DCD.

Comment:

*1. On page 2-34 of the **Draft Environmental Impact Statement** (DGEIS), Section 2.8.4, a clarification is necessary to address the following sentence: "Due to recent deregulation of utilities in New York State, **other electricity providers may service the City as well.**"*

Niagara Mohawk Power Corporation has been granted, by the City of Buffalo, the permission and consent to be the exclusive electricity provider within the City limits. As a result of the recent Public Service Commission (PSC) approval of ***PowerChoice*** *(NM's deregulation plan) this March,* ***Niagara Mohawk will continue to own and maintain the electricity distribution facilities within the City*** *but the energy feeding the system, and therefore consumed by the inhabitants within the City, would be supplied by energy services companies (ESCO's) hired by each customer. This of course is an over-simplification of the situation and greater detailed information can be provided.*

Response:

The above clarification of the current situation regarding electricity supply and distribution in the City of Buffalo has been noted. However, the approval of "PowerChoice" by the PSC and its subsequent implementation will have minimal effects on the economic and environmental costs and impacts resulting from the Main-LaSalle project. The cost of future electric service to area residents and businesses will not likely be significantly affected by the plan, although minor decreases or increases may occur, and Niagara Mohawk will maintain responsibility for the construction and maintenance of distribution lines on the project site (see Comment #2 below).

Comment:

2. *Also within Section 2.8.4 of the DGEIS it is stated that:*

> *"**Existing energy supplies are more than adequate** to provide service to the proposed revitalization project facilities, and **Niagara Mohawk would likely install new distribution lines at no cost to the site developer(s)**, as a means to remain competitive under the new deregulation (Wiate 1997)."*

Depending on the electrical loads of the newly developed facilities, Niagara Mohawk might be required to reconfigure the energy supply network surrounding the project. If this is necessary, a lengthy planning and construction process would be required and advance notice would be necessary to avoid development delays.

The second highlighted block of text, in the above paragraph, implies that Niagara Mohawk would ***not*** *require reimbursement for the proposed distribution facilities within the boundaries of the project. Once again,* ***this might not be the case****, depending on the circumstances and the type of development within the project scope. Niagara Mohawk is required to seek reimbursement for construction in accordance with the applicable PSC Tariffs in effect at the time of construction. Furthermore, the reconfiguring (e.g., converting overhead lines to underground), relocation and the removal of existing facilities could require Niagara Mohawk to seek full reimbursement. Niagara Mohawk reimbursement would also be applicable to the removal of street lighting facilities less than fifteen years old.*

Response:

The primary increase in electrical load to the Main-LaSalle project area will result from the addition of the approximately 250-unit central residential development and the expanded educational facilities (e.g., new school). The other facilities envisioned in the revitalization plan, including the expanded McCarthy Park and the revitalization of commercial uses along Main Street, will not likely increase electricity requirements significantly beyond those that currently exist.

The new central residential development and expanded educational facilities may require Niagara Mohawk to reconfigure the surrounding energy supply network. This factor, in conjunction with the PSC reimbursement requirements discussed in paragraph 2 of the comment above, may increase the costs of developing the electrical infrastructure for the site above those presently anticipated.

The City has budgeted funds for infrastructure development based on the assumption that some costs would be incurred for constructing new electric lines to the proposed developments. The factors described above thus are not likely to significantly increase the costs anticipated for infrastructure development, particularly when compared to the overall costs of the project.

The City will consult Niagara Mohawk as project development proceeds to arrange a mutually acceptable agreement for the construction or upgrading of electric distribution facilities in the project area. Future private developers or other government agencies will be responsible for negotiating with Niagara Mohawk for the provision of electric service to their respective facilities. In summary, although the factors described in the comment above may slightly increase the costs of project development as compared to those anticipated in the DGEIS, this potential increase will not significantly affect overall cost of the project, and will not affect the project's economic viability.

2.4 CULTURAL RESOURCES

The SHPO submitted a written comment letter (refer to Appendix B) that endorsed the archaeological study conducted of the Main-LaSalle as part of the environmental review; this study was included in the DGEIS. Also attached to the SHPO's letter is a list of historic structures in the Main-LaSalle project vicinity, including Bethune Hall. The same list, which was developed in conjunction with the SHPO's separate review of a New York State Department of Transportation project along Main Street, was provided by the SHPO in response to the scoping held for the Main-LaSalle project and is included in Appendix F of the DGEIS. The potential impacts of the Main-LaSalle revitalization project on historic structures are discussed in the DGEIS, along with the measures recommended to mitigate such effects (refer both to the DGEIS and to Section 3 of this document).

2.5 ECOLOGICAL/AQUATIC RESOURCES

Two comments on the DGEIS were received from NYSDEC Region 9 regarding aquatic

resources in the project vicinity (refer to Appendix B). The comments (comment numbers reference the NYSDEC comment letter) and DCD's responses are described below.

Comment:

4. Pages 2-36 states the Buffalo River is Class D. Actually, the Buffalo River is Class C.

Response:

The Class of the Buffalo River as reported in the DGEIS was based on information contained in a 1996 NYSDEC water quality report (NYSDEC 1996). Subsequent consultations with NYSDEC have indicated that the portions of the Buffalo River within the city limits were upgraded on October 31, 1997 from Class D to Class C in 6NYCRR Section 837.4 (personal communication with Steven Doleski, NYSDEC Region 9 Division of Environmental Permits, June 1, 1998).

The Buffalo River was discussed in only general terms in the DGEIS to reflect the overall water quality in the Buffalo area. The Main-LaSalle site is approximately 5 miles north of the river, and the revitalization project will not impact the water quality of the Buffalo River.

Comment:

5. Pages 2-36 gives the general overview of groundwater in the vicinity of the area. We believe it is appropriate to note that a DEC groundwater study was conducted in 1991. In addition, groundwater data is available from the Buffalo Sewer Authority, as part of their tunnel project conducted in the early 1990's.

Response:

Consultations with the Buffalo Sewer Authority (BSA) have confirmed that some geotechnical investigations were conducted as part of a stormwater conveyance tunnel project in the early 1990s. The tunnel was being considered for construction from the Hertel Avenue area (specifically, the intersection of Huntington and Wesley) to the LaSalle Reservoir, adjacent to the Main-LaSalle project site. The purpose of the geotechnical investigations conducted at that time were to determine what types of subsurface materials would have to be constructed through to install the tunnel. No groundwater sampling or studies were performed for this project; the subsurface profiling that was conducted did not extend to a depth sufficient to encounter groundwater (personal communication with Frank DiMascio, Buffalo Sewer Authority, June 1, 1998).

Information on groundwater in the site vicinity is available from the Phase I and Phase II engineering investigations performed at the direction of NYSDEC in the late 1980s and early 1990s (RECRA 1985; Ecology and Environment, Inc. 1991). These reports were reviewed and the results of the investigations were considered when designing and conducting the soils testing and Health Risk Assessment (HRA) for the site (URS Greiner, Inc. April 1997), and in evaluating potential project impacts and mitigation measures in the DGEIS. However, DCD agrees it is appropriate to

describe the results of the groundwater testing performed by NYSDEC in greater detail than was provided in the DGEIS, for the purpose of providing a better description of existing environmental conditions as pertaining to groundwater in the site vicinity.

The Phase I investigation of the project site (RECRA 1985) included a document/records search to determine whether there was any existing information on groundwater depth/quality in the project area. No previous analytical data was found for the site, and it was determined that there were no active groundwater wells in the vicinity. In 1989, an observation well was installed at the western end of the site and a groundwater sample was analyzed for corrosive properties and water quality. Analyses included bicarbonate, carbonate, sulfate, chloride, free carbon dioxide, and total hardness. Test results indicated that the sulfate content exceeded the "corrosive threshold" (2 to 3 parts per million [ppm]), and that free carbon dioxide existed at elevated levels (Ecology and Environment, Inc. 1991).

Three additional groundwater wells were installed in August 1989, as part of the Phase II site investigations (Ecology and Environment, Inc. 1991). The wells were located at the northern, western, and southern edges of the project site. The depth to water in these wells at that time ranged from 33.2 to 44.5 feet below ground surface, and groundwater flow was apparently to the northwest. Three groundwater samples were collected and analyzed from these wells. Five TCL organic compounds were found above the quantifiable detection limit in samples from one of the wells, with the level of 1,1,1-trichloroethene exceeding proposed United States Environmental Protection Agency (EPA) Maximum Contaminant Level (MCL) groundwater guidelines. Nine metals were detected, with concentrations of iron exceeding New York State Class GA standards in two of the wells. These low levels of PAH and metal contaminants in the groundwater were attributed to the former landfill on the site (Ecology and Environment, Inc. 1991). Due to the low levels of contaminants found, and the lack of active wells in the area, there is little health risk posed by groundwater in the site vicinity.

2.6 GENERAL COMMENTS ON FGEIS/SEQRA PROCESS

NYSDEC Region 9 included a general comment on the preparation of a FGEIS for the Main-LaSalle project and the SEQRA process, as follows (refer to Appendix B).

Comment:

In closing, I would like to re-emphasize that a FEIS should be done for the project, not a Negative Declaration. Response to public/agency comments in the FEIS is important, including providing reasoned answers as to why impacts are not significant. This should be done in the time frame provided by SEQR regulations to allow the public/agencies to review those comments/answers before any construction activity occurs.

Response:

As recommended in the comment above, Section 2 of this FGEIS responds to all

public/agency comments received on the DGEIS. Section 3 of this document summarizes anticipated project impacts and proposed mitigation measures, and briefly describes the reasons why impacts are not expected to be significant, or are out-weighed by potential project benefits.

Review and acceptance of this FGEIS will proceed based on the technical requirements and public review time frames specified by SEQRA. There will be a 10-day public comment period for the FGEIS following its acceptance by the lead agency, Buffalo DCD.

2.7 PHYSICAL RESOURCES/SOILS

Three written comments were received from NYSDEC Region 9 regarding the soil remediation activities proposed for the Main-LaSalle site in the DGEIS and *Soils Management Plan*, as described below (refer to Appendix B). The NYSDEC provided additional oral comments to DCD at a meeting held on June 8, 1998. Responses to these comments also are provided, as follows.

Comment:

1. The Draft Generic Environmental Impact Statement (DGEIS) is misleading in sections ES-13, 1-19 and 4-7, which suggested options of dealing with the soil are still viable. In fact, pages 4-8 more completely describe that many of the options have been determined to be inadequate and have been discarded. However, the DGEIS promotes the option of disposing of the contaminated soil, i.e., solid waste, on top of the existing landfill. If this is done, as you were previously advised, this Department would have jurisdiction on that disposal option, which would also include closure requirements for the entire landfill (not just the newly disposed-of material, but the historic material disposed of on-site prior to the new revitalization project).

Later in the letter, NYSDEC further discusses this issue as follows.

Our Division of Solid and Hazardous Materials is working on a Voluntary Cleanup Agreement in conjunction with the City. It is anticipated that the following work consisting of contaminated soil movement and capping could be authorized under the VCA. Since the preferred cleanup alternative for the site involves excavating the contaminated soils and disposing of them on the portion of the site where landfilling historically occurred, ***the minimum cover for capping over this material should be one foot of compacted clayey soil and six inches of topsoil. This cover should be sloped at a minimum of 4% to promote runoff and to reduce water infiltration through the existing fill material.***

Response:

The discussion of contaminated material disposal options on pages ES-13, 1-19, and 4-7, is presented in the context of the extensive evaluation of alternative remediation measures that the City has considered as this project has evolved over the past several years. Disposal options other than the

has considered as this project has evolved over the past several years. Disposal options other than the preferred (i.e., on-site disposal over the former landfill area) are included only to put the discussion of the evaluation of alternatives in context, and it is not meant to imply that any of the other options investigated in the past are still considered viable. For responses to comments regarding composition and slope of cover material over the contaminated soil area, refer to the discussion of the results of the June 8, 1998 meeting between NYSDEC and the city, presented later in this subsection.

Comment:

2. Please be aware that the Voluntary Cleanup Agreement (VCA) must be subjected to SEQR. The DGEIS attempts to describe the VCA, however, because the VCA does not yet exist, the reader is not able to judge the adequacy of the VCA. As mentioned previously, our DSHM will be giving you comments on the Soils Management Plan.

Response:

The VCA being negotiated between NYSDEC and the City will formalize the City's agreement to adhere to the procedures and requirements described in the *Soils Management Plan* (URS Greiner, Inc. April 1998) for the site, and to a lesser extent the DGEIS prepared for the project. Although the VCA was not drafted at the time of acceptance of the DGEIS, the *Soils Management Plan* was largely completed in draft form at that time (the draft of this document was distributed on May 13, 1998 as a supplement to the original DGEIS submission).

In response to comments submitted by NYSDEC, the *Soils Management Plan* will be updated. Revisions to this plan will reflect the responses to NYSDEC's comments, as presented in this FGEIS.

Further, in accordance with NYSDEC procedures, after the city and the NYSDEC endorse the amended *Soils Management Plan* and agree on the VCA, the completion of the VCA will be noticed in the Environmental Notice Bulletin. A 30-day period will be afforded for the public to comment on the VCA. The DCD will remain the SEQRA lead agency for this activity, will prepare the appropriate environmental documentation in conjunction with the VCA, and will take into consideration the results of the public review when issuing any necessary SEQRA determination concerning the VCA.

Comment:

3. On Pages 4-8 the DGEIS references Appendix C as containing the VCA. This is wrong because it has not been completed.

Response:

The sentence on page 4-8 of the DGEIS that references Appendix C discusses both the VCA and *Soils Management Plan*. This response serves to clarify that only the *Soils Management Plan* is

included in Appendix C, rather than both documents as may be implied.

Comment:

At a June 8, 1998 meeting between the NYSDEC and the city, NYSDEC provided several oral comments on the Soils Management Plan and VCA. These comments, some of which reiterate the NYSDEC's written comments on the DGEIS in general, are summarized as follows.

(a.) Under the VCA, it is anticipated that covering of the former quarry fill area will be authorized. Since the preferred cleanup alternative for the site involves excavating and disposing of the contaminated soils on the portion of the site where landfilling historically occurred, the minimum cover over this material should be one foot of compacted clayey soil and six inches of topsoil.

(b.) The cover over the former quarry fill area should be sloped at a minimum of 4% to promote runoff and to reduce water infiltration through the existing fill material.

(c.) NYSDEC also expressed concern that placing materials of low permeability over the former quarry could potentially block the release of methane gas (if any) generated by the fill materials. NYSDEC noted the potential for the methane to be released through areas of higher permeability soils (e.g., in adjacent, off site areas where portions of the former quarry are not covered by compacted clay soils).

(d.) In addition, NYSDEC indicated that the New York State Department of Health would require supplemental testing and monitoring during the excavation of the "clean" construction and demolition debris located along the southwestern portion of the former rail corridor. This clean material is slated for use as a cover material over the former quarry fill area.

(e.) Noting the potential for iron leaching and staining of soils, NYSDEC expressed concerns about high iron concentrations detected in soil/fill samples from the southern portion of the project area during the site investigations.

(f.) NYSDEC also indicated that plans for the site should include appropriate cover on sloped areas to avoid or minimize the potential for erosion, etc.

(g.) NYSDEC noted that neither NFTA's property at 3011 Main Street nor BEDC's property at 300 Amherst Street were included in the site investigations performed for the project area, and questioned whether these parcels would be included in the initial Main-LaSalle redevelopment.

Response:

At the June 8, 1998 meeting between the city and NYSDEC Region 9 personnel, NYSDEC's various comments were discussed and it was agreed that the following modifications to the *Soils Management Plan* will be made. The revised *Soils Management Plan* will be endorsed in the VCA.

(a.) One foot of clean soil will be placed over the quarry fill area. Six inches of topsoil will be spread over this material. (The total cover depth will thus equal 18 inches.) The one foot of clean soil material will be compacted to have a maximum permeability of 10^{-5}

centimeters per second (cm/s).

(b.) In the former quarry area, a slope of 4% will be maintained where practical and in all areas slopes will be maintained so as to provide positive drainage to promote surface runoff and to minimize infiltration.

(c.) Although no methane was encountered during the extensive site investigations conducted as part of the Main-LaSalle project, in response to NYSDEC's concerns about the potential migration of methane gas, city representatives discussed several alternatives to minimize the potential for methane migration off site or to check for the presence of methane releases. From among these alternatives (which included cover options, venting, or permanent monitoring), the city proposes the following.

In the northern area of the former quarry, adjacent to the Camelot Court apartments (which were constructed over fill), the one foot clean soil cover will consist of a granular soil material with a permeability of 10^{-4} cm/s or greater. The higher permeability soils are intended to promote the escape of methane gas, if any, through this soil area. In addition, periodic monitoring for methane at the perimeter of the covered area (i.e., area of low permeability, compacted clayey soils) may be performed.

(d.) Plans call for the construction and demolition debris/material along the southwestern portion of the former railroad corridor to be excavated and used to cover the former quarry area. Surficial sampling conducted of this material has indicated that the material is "clean". However, additional testing and monitoring will be performed during excavation to verify that the material is "clean" and suitable for use as cover. At a minimum, one sample will be collected per 2,500 cubic yards of material, as specified in *the Soils Management Plan*. Additional testing may be conducted if field conditions warrant. Full laboratory tests will be performed. If the material is found to be contaminated, it will be moved to the former fill area and treated in the same manner as the other contaminated soils in this area (e.g., covered per specifications).

(e.) With respect to the potential for iron leaching or staining, it should be noted that the elevated iron concentrations were recorded along the former rail corridor. There is presently no iron staining evident in these areas. Further, the potential for future visible leaching or staining is minimal since these areas will be covered by several feet of soils/fill excavated from the proposed residential housing areasduring site redevelopment work.

(f.) The *Soils Management Plan* specifies procedures for minimizing the potential for erosion and for providing appropriate cover/stabilization on slopes.

(g.) With respect to site investigations of the NFTA and BEDC properties in the Main-LaSalle project area, the two agencies that own these parcels both elected to conduct their own studies. Consequently, field studies (as described in the *Main-LaSalle Revitalization Project Site Investigation Report* presented in Appendix B of the DGEIS) were not commissioned by DCD on these properties.

No information is available concerning the status of site investigations, if any, for NFTA's parcel. This property is not included in the initial Main-LaSalle redevelopment.

BEDC has completed a site investigation of its property at 300 Amherst Street (Sterling Environmental, Inc. 1996). The site investigation report for this parcel was recently made available to DCD (refer to Appendix C to this Final GEIS). A review of the report indicates that the soil contamination at 300 Amherst Street is characteristic of the materials found elsewhere on the portion of the site south of Main Street. The BEDC parcel is slated for redevelopment as part of the first phase of the Main-LaSalle project. The *Soils Management Plan* will be updated, as appropriate, to reflect the results of the BEDC site investigation.

3. SUMMARY OF POTENTIAL ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The implementation of the Main-LaSalle Revitalization Project is expected to result in substantial beneficial impacts to the North Buffalo community and to the City of Buffalo. Positive impacts will result to land use, public health, the economy, recreational resources, urban design, and pedestrian/public transportation. Potential adverse effects will result to traffic congestion, air quality, and noise. The key beneficial and adverse impacts that are expected to occur as a result of the construction and redeveloped use of the Main-LaSalle project area are summarized below, along with the measures that are planned to reduce or avert such impacts.

3.1 SUMMARY OF IMPACTS

Land Use

The Main-LaSalle Revitalization Project will have a direct, positive impact on land utilization within the 110-acre project site, and is expected to result in indirect benefits to surrounding neighborhoods by improving the overall quality of urban life in the area. Overall, the project will result in long-term land use benefits by:

- Remediating the existing on-site soil contamination, which to date has limited land use redevelopment opportunities on the southern portion of the Main-LaSalle site;
- Returning a long-underdeveloped and unsightly area to productive use;
- Enhancing and maintaining the historical mix of residential, commercial, recreational, educational, and open space land uses that has characterized community development in the North Buffalo area.;
- Upgrading and expanding public recreational and educational facilities; and
- Providing a stimulus for land use improvements and redevelopment in surrounding neighborhoods and along Main Street.

Socioeconomics

The Main-LaSalle Revitalization Project will result in positive, long-term impacts on socioeconomic conditions, particularly with respect to the potential for increases in tax revenues from the residential and commercial developments on the site and -- to the extent that the project stimulates

additional economic growth -- in the surrounding areas of the city. The long-term benefits of the project are expected to outweigh the short-term negative socioeconomic effects associated with the implementation of the project, such as the expenditures of public fund for site rehabilitation and infrastructure development. The project's socioeconomic impacts are expected to include:

- An increase in quality, new housing units and an associated increase in population in the immediate project area;
- An increase in employment and income during the construction phase and, potentially, as a result of the new commercial development opportunities on the project site;
- A benefit to community facilities and services associated with the new elementary school, expansion of the LaSalle Station, and improvements to McCarthy Park;
- A negative economic impact associated with outlays of public funds for site revitalization during the construction phase; and
- An increase in property tax revenues that will accrue to local taxing jurisdictions as the currently underutilized portions of the Main-LaSalle site are rehabilitated and put into productive residential and commercial use. The annual property tax revenues that will be collected at full build-out of the project are estimated at $2.16 million.

Physical Resources

The Main-LaSalle project will cause extensive modifications to the physical resources on the project site, as follows:

- The topography of the site will change as a result of excavation and fill activities associated with the soil remediation program. Potentially contaminated materials removed from proposed residential use areas in the southern portion of the project site will be placed in McCarthy Park, spread over the existing soils, and capped with clean material in accordance with the *Soils Management Plan*. These soil remediation activities represent a minor, but long-term impact to the topography of McCarthy Park, as the park elevation will increase by approximately 2-3 feet.
- Impacts to the bedrock geology will result from drilling and blasting activities, or other means of rock removal, which will be required for the installation of infrastructure facilities (e.g., sewer lines, water lines, other utilities) in areas with shallow depths to bedrock. Noise, fugitive dust emissions and similar short-term and localized nuisance impacts will be associated with rock removal activities.
- Beneficial impacts on soils will result from the removal of contaminated soils from areas where residential developments are proposed in the southern portion of the project site, and the replacement of such soils with clean fill.

Contamination Issues

One of the primary concerns regarding the Main-LaSalle Revitalization Project is the contamination of parts of the southern portion of the site as result of historic landfilling activities. In order to address these concerns, DCD is consulting with NYSDEC to develop a VCA for the site. A *Soils Management Plan* (URS Greiner, Inc. April 1998) for the site has been developed. The

remediation measures identified in these documents to adequately mitigate health concerns include the following:

- Contaminated soils (and bedrock where necessary) in areas of the southern portion of the site where residential or commercial uses are planned will be excavated, disposed on-site in existing and proposed expansion areas of McCarthy Park, and capped with one foot compacted soil and 6 inches topsoil.
- Clean fill will be imported to the Main-LaSalle site to replace the excavated materials and provide a solid, clean foundation for buildings.

The replacement of contaminated soils with clean materials represents a positive, long-term impact to the environment and public health. No long-term adverse health impacts are expected to result from the on-site disposal of the excavated contaminated materials, because the soil cap will limit or eliminate the risk for routine exposure.

Transportation

The Main-LaSalle Revitalization Project will involve various modifications to vehicular, pedestrian, and mass transit forms of travel, as well as to the availability of parking. In particular, the project will include the following:

- Development and use of various new access roads within the southern portion of the site (i.e., within the residential "urban village" area and ingress/egress to McCarthy Park), and the creation of new intersections at Main Street and LaSalle Avenue to provide access points to the "urban village" area;
- Access points from Main Street to the new commercial plaza area and to the new educational facilities planned for location adjacent to Bennett High School;
- Additional parking for approximately 1,350 vehicles in the project area (including spaces at the various residential developments, commercial areas, educational facilities, LaSalle Station, and McCarthy Park);
- Modifications to the LaSalle Station to promote increased ridership, including new parking facilities;
- Design of various new pedestrian walkways, including the greenway trail, trails within McCarthy Park, and new sidewalk access between and within the project site and surrounding neighborhoods and streets;
- Short-term increases in traffic congestion associated with the movement of construction vehicles to and from the site; and
- Long-term increases in localized traffic congestion, stemming from the new residential, commercial, and educational facilities in the area.

Cultural Resources

The project will result in indirect impacts to cultural resources, and may potentially result in a negative adverse impact to All-High Stadium, as summarized below:

- No impacts to archaeological resources will result from the implementation of the revitalization plan.
- Potential indirect (visual) impacts to Bennett High School and All-High Stadium, which have been identified as eligible for the National Register of Historic Places (NRHP). In addition, the project is within the potential viewshed of several other NRHP-eligible structures and districts, including the Main Street Firehouse, Bethune Hall, St. Andrew's Church Rectory, the SUNY Buffalo Main Street Campus Historic District and the University Heights Commercial Historic District. Although the visual context of the structures will change due to the land use modifications on the Main-LaSalle site, these indirect effects are expected to be positive because the project will improve the visual quality of the area and will be consistent with the historic structures in terms of scale, setting, color/textures, and design. Further, the project is expected to be implemented in accordance with design specifications that are intended to reflect the historical "urban village type" setting of the area.
- A direct impact to All-High Stadium (an historic structure) will result if the new school is developed as indicated on the Final Concept Master Plan. This preliminary plan would involve the removal of the northern bleachers at the stadium for the construction of the school. The athletic field and other viewing areas at the stadium would not be adversely affected. The Buffalo Board of Education, the agency that will be responsible for the new school, will be responsible for addressing the potential impacts to All-High Stadium in any environmental analyses performed for the project. Mitigation measures may include photo-documenting the stadium prior to demolition of the northern bleachers. Future consultations between the Board of Education and the State Historic Preservation Office also should be conducted as the planning for the school proceeds.

Urban Design, Visual Resources, and Recreation

The project will have positive, long-term impacts on urban design, visual resources, and recreational resources, as follows:

- Temporary adverse impacts will occur as a result of site remediation and construction activities.
- After site redevelopment, the aesthetic appeal and setting of the project area will improve significantly. The establishment of a new residential-commercial activity center on the revitalization site, and the planned expansion of recreational, transit, and educational facilities, are expected to draw people to the area and to have implications for the revitalization of nearby neighborhoods and commercial areas.
- Positive long-term impacts to recreational resources will stem from the expansion of McCarthy Park, as well as the creation of the new greenway trail that will link McCarthy Park with Shoshone Park. The increased recreational use opportunities will benefit not only residents of the immediate area, but also the general public in the City of Buffalo.
- Temporary restrictions on the use of McCarthy Park during soil remediation and construction activities will result in minor, short-term adverse impacts to recreational users of the park. The extent of the disruption will depend on the schedule for construction.

Air Quality

Impacts to air quality will occur both during project construction and implementation. Although minor, impacts to air quality are expected to be long-term.

- Minor, temporary adverse impacts to air quality will result from the operation of construction and construction-related equipment during the remediation and construction phases of project development. Impacts will occur as a result of both emissions from construction vehicles and from the generation of fugitive dust during earth-moving and excavation/filling activities.

- Minor, long-term adverse impacts to air quality also will result from the proposed project, due primarily to increased vehicular traffic. These increased traffic volumes will result from the new residential/commercial developments, as well as from the anticipated increased use of McCarthy Park and the NFTA facilities. Of particular concern is the intersection where the access road for the new "urban village" residential development will outlet to Main Street. Traffic delays at this intersection could potentially cause elevated carbon monoxide (CO) levels at peak travel hours, or a CO "hot spot", in the absence of mitigative measures.

Noise

The proposed revitalization project will have minor short- and long-term impacts on noise levels in the project vicinity. Short-term increases in noise levels (generally in the range of 80-100 dB) will result from the operation of construction and related equipment during project development, while long-term increases in background noise will result from the general redevelopment of the site and from increased traffic volumes in the project area.

Public Utilities

Redevelopment of the project area will result in minor, but long-term impacts on public utilities, as follows:

- An increased demand for drinking water. The distribution lines in the project vicinity have experienced low pressure in the past, and the increased demand resulting from the project could adversely affect pressure rates, creating a significant long-term impact on the local water supply. Options to mitigate these impacts include the construction of a new water tower on site, the construction of a new pumping station (on or off site), or renovation of an existing pumping station.

- Potential increases in electric demand associated primarily with the new residential development and the potential expansion of educational facilities.

- An increased demand on sanitary and storm water sewers. Site developers will be required to implement measures that ensure that the amount of storm water run-off leaving the site following redevelopment is approximately equivalent to or less than that currently generated on the site, in order to obtain a permit from the BSA.

- Increased amounts of solid waste will temporarily be generated during the construction phases of the redevelopment project, and long-term, but minor, increases in solid waste production will result from the additional residential, educational, recreational, and commercial facilities proposed.

Ecological Resources

The Main-LaSalle Revitalization Project will result in the following impacts to ecological resources:

- No impacts to on-site aquatic resources (there are no surface water resources on the site).
- A permanent loss or conversion of early successional forest and open field vegetation (approximately 30 acres) and the wildlife habitat it represents. However, the existing biological resources (vegetation and wildlife) on the project site are characteristic of disturbed/developed urban areas, and are relatively common. Consequently, the loss of this vegetation and habitat will represent only a minor impact to the resource. In addition, future land uses on the site (e.g., the proposed greenway trail and landscaped areas) represent similar habitats to those being displaced, and can be expected to compensate for the loss of existing vegetation.

Public Health Issues

A primary concern regarding the proposed revitalization plan is the contamination of the southern portion of the site with metals and PAHs as result of historic landfilling activities. Field investigations and the development of a Health Risk Assessment (HRA) for the site showed that, if not remediated, there are potential health risks to future residents, recreational users, and construction workers from these materials.

Various potential remedial alternatives were identified and evaluated to determine their applicability in remediating the site and in reducing risks to public health. Three alternatives were determined to be potentially appropriate for remediating the site: soil cover over the entire site; excavation of soils in high bedrock areas (generally those areas outside the former quarry) with either on-site or off-site disposal; and in-situ stabilization of contaminated soils in the high bedrock area. These alternatives were further evaluated based on cost and implementation considerations. Based on the HRA, the analysis of the remedial options, and site investigations, the following recommendations were identified and incorporated into the final design plan or the *Soils Management Plan* for the site:

- Implement remediation prior to site redevelopment to limit dermal contact, ingestion, and inhalation of fugitive dust by construction workers, residents, and recreational users.
- Locate residential areas in areas of high bedrock, where the depth of contaminated soil/fill is lowest.
- Restrict future development in the former quarry area to recreational uses.
- Design roadways and other paved areas so as to "cover or cap" some of the contaminated soil areas to minimize the need for soil remediation.
- Cover the former quarry with clean fill to mitigate the potential for dermal contact, ingestion, or inhalation of fugitive dust by future recreational users.
- Do not construct any basements in the high bedrock areas unless the full thickness of the contaminated soil/fill contamination at that location has been removed or remediated. Do not construct basements in the quarry area.

The *Soils Management Plan* discusses the specific methods for managing contaminated soils to reduce/eliminate potential health risks to construction workers and/or future site residents and recreational users. In general, the *Plan* specifies:

- Removal, prior to development, of all contaminated soils underlying areas slated for residential development (including roadways and green spaces) down to the top of natural soils or bedrock, whichever is encountered first.
- Disposal of contaminated soils on site in areas slated for recreational development, including the portions of the former railroad right-of-way, greenway along the eastern border of the site, McCarthy Park (prior to capping), and architectural bunkers and embankments.
- Use the clean construction and demolition debris from the southern portion of the railroad right-of-way as cover over the contaminated soil, to the extent possible.

The *Soils Management Plan* also specifies the procedures to which the on site contractor must adhere when performing soil remediation activities. Such procedures include requirements for a site safety and health plan.

3.2 RECOMMENDED MITIGATION MEASURES

The Main-LaSalle Revitalization Project is expected to generally result in positive, long-term impacts on most environmental features. However, these anticipated positive impacts reflect the incorporation into the project planning process of various measures to mitigate or avert significant adverse environmental impacts.

Such mitigation measures, which either are reflected in the *Final Concept Master Plan* for the site revitalization or are planned for implementation during project construction, include:

- The development of a soils remediation and management program that will fully address the contamination on the southern portion of the site and that will allow productive site redevelopment, in accordance with state and local clean-up requirements;
- The selection of a preferred revitalization plan that takes into consideration concerns for public health, recreational facilities, neighborhood preservation, open space, and improved transportation access to the site;
- The establishment of project design guidelines, which will amend the existing zoning classifications for the Main-LaSalle site and will promote redevelopment of the site that is consistent with the visual character and historic uses in the adjacent neighborhoods;
- The design of new residential streets and intersections to prevent through traffic in housing areas and to promote traffic flows;
- The recommendation of methods (e.g., soils clean-up procedures, rock blasting/drilling alternatives) to minimize or avoid significant adverse impacts during site rehabilitation and construction; and

- The required conformance of the project (publicly funded and privately developed uses) to applicable state and local regulations, codes, ordinances, and permit approvals.

Mitigation measures have been considered throughout the project planning process. For example, the *Final Concept Master Plan*, special design guidelines, and proposed construction/site redevelopment techniques all represent measures to maximize positive impacts and to minimize adverse impacts, to the extent feasible. Moreover, the project's inherent characteristics are focused on the provision of long-term benefits to the Main-LaSalle community and to the City of Buffalo as a whole, including:

- *Productive use of underutilized (vacant) land.*
- *Remediation of soil contamination associated with past quarry filling.*
- *Improvements to neighborhood community services through the expansion and upgrade of recreational facilities at McCarthy Park and along the greenway trail, as well as by the educational facility improvements associated with the planned new elementary school.*
- *Enhancement of neighborhood character by improving the streetscape along Main Street and the visual environment of the entire Main-LaSalle site.*

Although adverse environmental impacts will occur during the development of the project, they will be minimized, as appropriate, through the use of various general and site-specific mitigation measures. With the incorporation of these mitigation measures, the project is expected to result in positive, long-term overall impacts that will offset the capital costs of site redevelopment and the adverse effects that cannot otherwise be avoided.

4. REFERENCES

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DeLeuw, Cather, and Company of New York, 1998, *Main-LaSalle Revitalization Plan: Final Conceptual Master Plan*, Buffalo, New York.

DiMascio, Frank J., June 1, personal communication, Principal Sanitary Engineer, Buffalo Sewer Authority, Buffalo, New York.

Doleski, Steven J., June 1, 1998, personal communication, Regional Permit Administrator , New York State Department of Environmental Conservation, Region 9, Buffalo, New York.

Ecology and Environment, Inc., April 1991, Engineering Investigations at Inactive Hazardous Waste Sites in New York, Phase II Investigations, LaSalle Reservoir Site, Site No. 915033, New York State Department of Environmental Conservation, Buffalo, New York.

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Sterling Environmental, Inc., 1996, *Site Investigation Report for BEDC Property at 300 Amherst Street, Buffalo, New York*, Buffalo, New York.

URS Greiner, Inc., April 1997, Site Investigation Report, Main-LaSalle Revitalization Project, Buffalo Urban Renewal Agency, Department of Community Development, Buffalo, New York.

URS Greiner, Inc., May 1998, *Soils Management Plan*, Buffalo, New York.

APPENDIX A

PUBLIC HEARING NOTICE

May 14, 1998

Main LaSalle Project

Public Hearing - Draft Generic EIS

ATTENDANCE SHEET

NAME	ORGANIZATION / Address	PHONE NO
Robert Lewis	325 Manhattan	836-4450

COMBINED NOTICE
State Environmental Quality Review Act
NOTICE OF COMPLETION OF DRAFT GEIS
AND
NOTICE OF PUBLIC DRAFT GEIS HEARING

Date: Wednesday April 29, 1998
Lead Agency: City of Buffalo, Department of Community Development
Address: Room 920 City Hall 65 Niagara Square Buffalo, New York 14202

This Notice is issued pursuant to Part 617 of the implementing regulations pertaining to Article 8 (State Environmental Quality Review Act) of the Environmental Conservation Law. A Draft Generic Environmental Impact Statement (DGEIS) has been completed and accepted for the proposed action described below. Written comments on the Draft GEIS are requested and will be accepted by the contact person until 4:00 p.m., Friday, May 29, 1998.

NAME OF ACTION:
Main-LaSalle Revitalization Project

SEQR Status: Type 1

Location: Within the area generally bounded by Main Street and the LaSalle Transit Station on the north, Manhattan Avenue on the west, East Amherst Street on the south and LaSalle Avenue, Cordova Street, east edge of McCarthy Park and the LaSalle Quarry on the east, Buffalo, New York.

Description: The City of Buffalo Department of Community Development (DCD) is proposing to adopt a master land use plan and to amend zoning classifications in the Main-LaSalle Revitalization Project area, which will result in the redevelopment of the area with new residential commercial, recreational, and educational facilities. The project area encompasses approximately 120 acres. The City is proposing to provide the necessary resources for soil testing and remediation, property acquisition, rehabilitation, clearance/demolition, relocation of affected property owners (if necessary), and the installation of public facilities/improvements and infrastructure in order to facilitate redevelopment of the area. The project will be financed with a combination of public and private funds.

Potential Environmental Impacts: The project will result in the following potential negative impacts on the environment: construction continuing for more than one year; possible construction of off-street parking for 1,000 vehicles; temporary closing of all or some of the recreational facilities at McCarthy Park; temporary increase in noise during construction; rerouting of existing traffic circulation patterns within the local area potentially affecting not only traffic circulation but also air quality; possible future demolition of part of All High Stadium; possible relocation of area residents and businesses; soil remediation; alterations to existing land uses; and possible long-term increase of noise levels.

ALSO IN ACCORDANCE WITH THE PROVISIONS OF SEQRA, a public hearing will be held by the Department of Community Development in:
Room 901 City Hall, Buffalo, New York 14202
at 3:00 p.m., Thursday - May 14, 1998

The purpose of the hearing is to permit the Department of Community Development to obtain public comment on the proposed Main-LaSalle Project and the project's Draft Generic Environmental Impact Statement.

Any person or organization desiring to be heard regarding the proposed project is hereby invited to appear at the public hearing, at which time such person or organization will be afforded an opportunity to be heard. Those wishing to speak at the hearing are requested to submit their comments in writing at the hearing.

COMMENTS ON THE DRAFT GEIS SHOULD BE SENT TO:
Contact Person:
Mr. Gregory J. Bernas
Assistant Environmental Program Coordinator
Address: Department of Community Development
Division of Planning
901 City Hall
65 Niagara Square
Buffalo, New York 14202
Telephone Number:
(716) 851-5083

COPIES OF THE DRAFT GEIS ARE ALSO AVAILABLE FOR REVIEW OR PURCHASE FROM THE CONTACT PERSON LISTED ABOVE.

THE DRAFT GEIS IS ALSO AVAILABLE FOR REVIEW AT:
Address: Buffalo/
Erie County Library
Central Library
Lafayette Square
Buffalo, New York 14203
Contact Person: Joyce Davoli
Area 8; Business Information Department
Telephone Number:
(716) 858-8900

William F. Jerge

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of the City of Buffalo, New York, being duly sworn, deposes and says that he/she is Principal Clerk of THE BUFFALO NEWS, DIV. OF BERKSHIRE HATHAWAY, INC., Publisher of the BUFFALO NEWS, a newspaper published in said city, that the notice of which the annexed printed slip taken from said newspaper is a copy, was inserted and published therein 1 time, the insertion being on the 29TH day of APRIL, 1998.

Date Ad Ran: 4/29/98

Sworn to before me this 30TH day of APRIL, 1998

Notary Public, Erie County, New York

SHUKRIYYAH HAWKINS
Notary Public, State of New York
Qualified In Erie County
My Commission Expires 9/30/99

COMBINED NOTICE

State Environmental Quality Review Act

NOTICE OF COMPLETION OF DRAFT GEIS
AND
NOTICE OF PUBLIC DRAFT GEIS HEARING

Date: Wednesday, April 29, 1998

Lead Agency: City of Buffalo, Department of Community Development

Address: Room 920 City Hall
65 Niagara Square
Buffalo, New York 14202

\

This Notice is issued pursuant to Part 617 of the implementing regulations pertaining to Article 8 (State Environmental Quality Review Act) of the Environmental Conservation Law.

A Draft Generic Environmental Impact Statement (DGEIS) has been completed and accepted for the proposed action described below. Written comments on the Draft GEIS are requested and will be accepted by the contact person until 4:00 p.m. Friday, May 29, 1998.

NAME OF ACTION: **Main-LaSalle Revitalization Project**

SEQR Status: Type 1

Location: Within the area generally bounded by Main Street and the LaSalle Transit Station on the north, Manhattan Avenue on the west, East Amherst Street on the south and LaSalle Avenue, Cordova Street, east edge of McCarthy Park and the LaSalle Quarry on the east, Buffalo, New York.

Description: The City of Buffalo Department of Community Development (DCD) is proposing to adopt a master land use plan and to amend zoning classifications in the Main-LaSalle Revitalization Project area, which will result in the redevelopment of the area with new residential commercial, recreational, and educational facilities. The project area encompasses approximately 120 acres. The City is proposing to provide the necessary resources for soil testing and remediation, property acquisition, rehabilitation, clearance/demolition, relocation of affected property owners (if necessary), and the installation of public facilities/improvements and infrastructure in order to facilitate redevelopment of the area. The project will be financed with a combination of public and private funds.

Potential Environmental Impacts: The project will result in the following potential negative impacts on the environment: construction continuing for more than one year; possible construction of off-street parking for 1,000 vehicles; temporary closing of all or some of the recreational facilities at McCarthy Park; temporary increase in noise during construction; rerouting of existing traffic circulation patterns within the local area potentially affecting not only traffic circulation but also air quality; possible future demolition of part of All High Stadium; possible relocation of area residents and businesses; soil remediation; alterations to existing land uses; and possible long-term increase of noise levels.

ALSO IN ACCORDANCE WITH THE PROVISIONS OF SEQRA, a public hearing will be held by the Department of Community Development in:

Room 901 City Hall, Buffalo, New York 14202
at 3:00 p.m., Thursday, May 14, 1998

The purpose of the hearing is to permit the Department of Community Development to obtain public comment on the proposed Main-LaSalle Project and the project's Draft Generic Environmental Impact Statement.

Any person or organization desiring to be heard regarding the proposed project is hereby invited to appear at the public hearing, at which time such person or organization will be afforded an opportunity to be heard. Those wishing to speak at the hearing are requested to submit their comments in writing at the hearing.

COMMENTS ON THE DRAFT GEIS SHOULD BE SENT TO:

Contact Person: Mr. Gregory J. Bernas
Assistant Environmental Program Coordinator

Address: Department of Community Development
Division of Planning
901 City Hall
65 Niagara Square
Buffalo, New York 14202

Telephone Number: (716) 851-5083

COPIES OF THE DRAFT GEIS ARE ALSO AVAILABLE FOR REVIEW OR PURCHASE FROM THE CONTACT PERSON LISTED ABOVE.

THE DRAFT GEIS IS ALSO AVAILABLE FOR REVIEW AT:

Address: Buffalo/Erie County Library
Central Library
Lafayette Square
Buffalo, New York 14203

Contact Person: Joyce Davoli
Area 8; Business Information Department

Telephone Number: (716) 858-8900

A Copy of this Notice and the Draft GEIS Sent to:

City of Buffalo; Honorable Anthony M. Masiello, Mayor

Buffalo Urban Renewal Agency; Anthony M. Masiello, Chairman

Buffalo Common Council

Buffalo Sewer Authority; Anthony Hazzan, General Manager

Buffalo Department of Public Works; Joseph Giambra, Commissioner

Niagara Frontier Transportation Authority; Richard Swist, Director

Erie County Department of Environment and Planning; Richard Tobe, Commissioner

New York State Department of Environmental Conservation; Commissioner; Regional Director

New York State Office of Parks, Recreation and Historic Preservation; Ruth L. Pierpont, Director, Historic Preservation Field Services

New York State Department of Transportation; Robert J. Russell, Regional Director

Buffalo Water Authority; Joseph Giambra, Chairman

Erie County Health Department; Arnold N. Lubin, M.D., Commissioner

Erie County Water Authority

Buffalo Fire Department; Cornelius Keane, Commissioner

Buffalo Police Department; Gil Kerlikowske, Commissioner

City Planning Board; S. Theodore Berg, Chairman

Buffalo Law Department; Corporation Counsel Michael Risman

Niagara Frontier Transportation Committee; Edward Small, Staff Director

Buffalo Comptroller; Joel A. Giambra

Buffalo/Erie County Library, Central Library

New York State Department of Education

Buffalo Board of Education; Mrs. Marlies A. Wesolowski, President

State University of New York

Buffalo Parks Department

State Department of Health

Distribution List Continued
A Copy of this Notice Only Sent to:

Erie County Industrial Development Agency

Western New York Economic Development Corporation; Judith Kossy, President

Buffalo Environmental Management Commission; James Smith

Greater Buffalo Development Foundation; Andrew Rudnick, President

Buffalo Assessment Department; Joseph Sole, Commissioner

Buffalo Enterprise Development Corporation; Alan DeLisle

All Buffalo Common Councilmembers

Bell Atlantic Telephone Co.

Buffalo Department of Administration and Finance; Eva Hassett, Commissioner

Buffalo Department of Street Sanitation; Commissioner Paul Sullivan

Buffalo Zoning Board

Gerard Edwards, Property Manager, Consolidated Rail Corp.

Gary Kilborn, Niagara Mohawk Corp.

Great Lakes Motor Corp.

Brauvin High Yield Fund, L.P.

Michael and Nancy Miranda

Crisis Services Foundation, Inc.

AA&L Associates, L.P.

Keystone Corporation

Evelyn Zacher

Ellicott Lanes, Inc.

Rick Hattan

Bea Skarbowski

Citizens Advisory Committee, Hallie Howell, Chairman

Leonard Walk, c/o Roger Simon, Gibson, McAskill, Crosby

LaSalle Avenue Assoc., L.P.

Ricky Bostoph

Daniel A. Cane

Distribution List Continued
A Copy of this Notice Only Sent to:

Stephen Costello

Shirley M. Brown

Thomas G. and W. Shaw

Ahmed Syed

Gregg Neville

Waldheim Iron Works, Inc.

TCI of New York, Inc.

APPENDIX B

COPIES OF WRITTEN COMMENTS RECEIVED ON THE DRAFT GENERIC ENVIRONMENTAL IMPACT STATEMENT

Erie County Water Authority

350 Ellicott Square Building • 295 Main Street • Buffalo, NY 14203-2494
716-849-8484 • FAX 716-849-8463

LEGAL DEPARTMENT

May 14, 1998

City of Buffalo
Department of Community Development
Room 920 City Hall
65 Niagara Square
Buffalo, New York 14202
Attention: Gregory J. Bernas

Re: Main/LaSalle Revitalization Project

Dear Mr. Bernas:

Please be advised that the Erie County Water Authority has no objection to the City of Buffalo being designated lead agency in the above named project. Additionally, the Erie County Water Authority has no comment or input on the project at this time.

Very Truly Yours,

ERIE COUNTY WATER AUTHORITY

William R. Crowe
Associate Counsel

WRC/sed
L.D. File #98-025-1

NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315)474-1511

May 29, 1998

Mr. Gregory J. Bernas
Assistant Environmental Program Coordinator
Department of Community Development
City of Buffalo Division of Planning
901 City Hall
65 Niagara Square
Buffalo, NY 14202

RE: Comments on Draft GEIS for the Main-LaSalle Revitalization Project

Dear Mr. Bernas:

Niagara Mohawk applauds the City of Buffalo's revitalization plans of the Main-LaSalle project area. Development such as this can only strengthen the local economy, enhance Buffalo's image and increase our customer base.

After briefly reviewing the **Draft Environmental Impact Statement** (April 27, 1998) and the **Soils Management Plan** (May 13, 1998), Niagara Mohawk (NM) would like to submit the following comments/concerns about the information contained within these documents. Please be advised, our comments/concerns are not limited to the information contained within this document:

1. On page 2-34 of the **Draft Environmental Impact Statement** (DGEIS), Section 2.8.4, a clarification is necessary to address the following sentence:

   "Due to recent deregulation of utilities in New York State, other electricity providers may service the City as well."

   Niagara Mohawk Power Corporation has been granted, by the City of Buffalo, the permission and consent to be the exclusive electricity provider within the City limits. As a result of the recent Public Service Commission (PSC) approval of ***PowerChoice*** (NM's deregulation plan) this March, **Niagara Mohawk will continue to own and maintain the electricity distribution facilities within the City <u>but</u>** the energy feeding the system, and therefore consumed by the inhabitants within the city, would be supplied by energy services companies (ESCO's) hired by each customer. This of course is an over-simplification of the situation and greater detailed information can be provided.

2. Also within Section 2.8.4 of the DGEIS it is stated that:

> "Existing energy supplies are more than adequate to provide service to the proposed revitalization project facilities, and Niagara Mohawk would likely install new distribution lines at no cost to the site developer(s), as a means to remain competitive under the new deregulation (Wiate 1997)."

Depending on the electrical loads of the newly developed facilities, Niagara Mohawk might be required to reconfigure the energy supply network surrounding this project. If this is necessary, a lengthy planning and construction process would be required and advance notice would be necessary to avoid development delays.

The second highlighted block of text, in the above paragraph, implies that Niagara Mohawk would **not** require reimbursement for the proposed distribution facilities within the boundaries of the project. Once again, **this might not be the case**, depending on the circumstances and the type of development within the project scope. Niagara Mohawk is required to seek reimbursement for construction in accordance with the applicable PSC Tariffs in effect at the time of construction. Furthermore, the reconfiguring (e.g. converting overhead lines to underground), relocation and the removal of existing facilities could require Niagara Mohawk to seek full reimbursement. Niagara Mohawk reimbursement would also be applicable to the removal of street lighting facilities less than fifteen years old.

Thank you for seeking comments on this exciting revitalization plan and we look forward to receiving more information to start the planning process. Questions and clarifications regarding this document can be obtained by calling Mr. David Paprocki, Supervisor Electric Sales and Service, at (716) 857-4031.

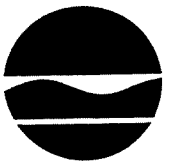
Sincerely,

Robert S. Reynolds
Consumer Advisor
Niagara Mohawk Power Corporation

Hand Delivered by Robert S. Reynolds on 5/29/98

CC: David Paprocki
James Perez
Diana Cunningham

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Region 9 Division of Environmental Permits
270 Michigan Avenue, Buffalo, New York 14203-2999
(716) 851-7165



John P. Cahill
Commissioner

May 28, 1998

Mr. Greg Bernas
Assistant Environmental Program Coordinator
City of Buffalo Department of Community Development
Division of Planning
901 City Hall
65 Niagara Square
Buffalo, NY 14202

Dear Mr. Bernas:

Draft Generic Environmental Impact Statement
Main-LaSalle Revitalization Project
City of Buffalo, Erie County

The following are this Department's comments on the above referenced Statement. Comments on the Soils Management Plan will be submitted under separate cover by our Division of Solid and Hazardous Materials (DSHM).

1. The Draft Generic Environmental Impact Statement (DGEIS) is misleading in sections ES-13, 1-19 and 4-7, which suggested options of dealing with the soil are still viable. In fact, pages 4-8 more completely describe that many of the options have been determined to be inadequate and have been discarded. However, the DGEIS promotes the option of disposing of the contaminated soil, i.e. solid waste, on top of the existing landfill. If this is done, as you were previously advised, this Department would have jurisdiction on that disposal option, which would also include closure requirements for the entire landfill (not just the newly disposed-of material, but the historic material disposed of on-site prior to the new revitalization project).

2. Please be aware that the Voluntary Cleanup Agreement (VCA) must be subjected to SEQR. The DGEIS attempts to describe the VCA, however, because the VCA does not yet exist, the reader is not able to judge the adequacy of the VCA. As mentioned previously, our DSHM will be giving you comments on the Soils Management Plan.

3. On Pages 4-8 the DGEIS references Appendix C as containing the VCA. This is wrong because it has not been completed.

4. Pages 2-36 states the Buffalo River is Class D. Actually, the Buffalo River is Class C.

5. Pages 2-36 gives the general overview of groundwater in the vicinity of the area. We believe it is appropriate to note that a DEC groundwater study was conducted in 1991. In addition, groundwater data is available from the Buffalo Sewer Authority, as part of their tunnel project conducted in the early 1990's.

Our Division of Solid and Hazardous Materials is working on a Voluntary Cleanup Agreement in conjunction with the City. It is anticipated that the following work consisting of contaminated soil movement and capping could be authorized under the VCA. Since the preferred cleanup alternative for the site involves excavating the contaminated soils and disposing of them on the portion of the site where landfilling historically occurred, **the minimum cover for capping over this material should be one foot of compacted clayey soil and six inches of topsoil. This cover should be sloped at a minimum of 4% to promote runoff and to reduce water infiltration through the existing fill material.**

In closing, I would like to re-emphasize that a FEIS should be done for this project, not a Negative Declaration. Response to public/agency comments in the FEIS is important, including providing reasoned answers as to why impacts are not significant. This should be done in the time frame provided by SEQR regulations to allow the public/agencies to review those comments/answers before any construction activity occurs.

Respectfully,

Steven J. Doleski

Steven J. Doleski
Regional Permit Administrator

prd

cc: Mr. Martin Doster, NYSDEC Division of Solid & Hazardous Materials
Mr. Mark Hans, NYSDEC Division of Solid & Hazardous Materials
Mr. Glen Bailey, NYSDEC Division of Environmental Enforcement

OFFICE OF PARKS · RECREATION · HISTORIC PRESERVATION
NEW YORK STATE

Bernadette Castro
Commissioner

New York State Office of Parks, Recreation and Historic Preservation
Historic Preservation Field Services Bureau
Peebles Island, PO Box 189, Waterford, New York 12188-0189 518-237-8643

May 26, 1998

Mr. Greg Bernas
Assistant Environmental
Program Coordinator
Community Development Department
901 City Hall
Buffalo, NY 14202

Dear Mr. Bernas:

RE: **SEQRA/DEC**
Main-LaSalle Revitalization Plan
Buffalo, Erie County
96PR2368

The Office of Parks, Recreation and Historic Preservation (OPRHP) has received the Draft GEIS for the Main-LaSalle Revitalization Project. As the state agency responsible for the coordination of the State's historic preservation programs, including the encouragement and assistance of local preservation programs, we offer the following comments.

Recommendations regarding archeology and known listed and eligible historic properties in the area of the project are provided on the enclosures.

When responding, please be sure to refer to the OPRHP project review (PR) number noted above. If you have any questions, please feel free to call me at (518) 237-8643 ext. 255.

Sincerely,

Robert D. Kuhn, Ph.D.
Historic Preservation Coordinator
Field Services Bureau

RDK/rma
Enclosures

ARCHEOLOGY COMMENTS

96 PR 2368

Based upon a review of the Cultural Resource Survey Report for the Main-LaSalle Revitalization Plan the Office of Parks, Recreation and Historic Preservation (OPRHP) concurs with the archeological recommendations of the report. OPRHP has no concerns regarding potential project impacts on archeological resources within the project area.

If you have any questions concerning archeology, please call Robert Kuhn at (518) 237-8643 ext. 255.

New York State Office of Parks, Recreation and Historic Preservation
Historic Preservation Field Services Bureau
Peebles Island, PO Box 189, Waterford, New York 12188-0189 518-237-8643

Orin Lehman
Commissioner

ELIGIBILITY EVALUATION **DATE:** 3/31/93 **STAFF:** C. Ross

PROPERTY: Bethune Hall, SUNY/Buffalo **MCD:** Buffalo
ADDRESS: 2917 Main Street **COUNTY:** Erie
PROJECT REF: _____ USN: 02940.006737

I. ___ Property is individually listed on SR/NR: _____
name of listing
___ Property is a contributing component of a SR/NR district: _____
name of district

II. ___ Property appears to meet eligibility criteria.
___ Property contributes to a district which appears to meet eligibility criteria. **Pre SRB:** ___ **Post SRB:** ___ _____
SRB date

National Register Criteria for Evaluation:

A. X Associated with events that have made a significant contribution to the broad patterns of our history;
B. ___ Associated with the lives of persons significant in our past;
C. X Embodies the distinctive characteristics of a type, period or method of construction; or represents the work of a master; or possess high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction;
D. ___ Have yielded, or may be likely to yield information important in prehistory or history.

STATEMENT OF SIGNIFICANCE: Bethune Hall is eligible for listing on the National Register of Historic Places under Criteria A and C. It is architecturally significant as a distinguished, representative example of early twentieth century industrial architecture in Buffalo. Built ca. 1915, the Buffalo Meter Company occupied the factory building for many years before selling it to the University of Buffalo in 1971. Designed by Lockwood, Greene and Company, the "Daylight Factory" is a four story tall and four bays wide by twelve bays long building. Each bay features an exposed reinforced concrete frame, filled entirely with glass carried in standard steel sash, with a brick spandrel below the sill. The interior plan is interrupted only by columns at eighteen-foot centers on a square grid and is partitioned by a solid block rising through all four floors and dividing the simple rectangular layout into unequal but proportional halves. This Daylight Factory building retains a high level of integrity and is an important surviving example of its type from the period.

NATIONAL REGISTER ELIGIBILITY COMMENTS

96 PR 1716

Based upon a review of the Cultural Resource Survey Report for PIN 5034.93.101 the Office of Parks, Recreation and Historic Preservation (OPRHP) can provide the following information:

The following properties within the project area have been previously determined eligible or listed on the State and National Register of Historic Places:

districts

The East Parkside Subdivision Historic District
The SUNY Buffalo Main Street Campus Historic District

individual properties

2211 Main Street
2253 Main Street
2521 Main Street
2495 Main Street
2540 Main Street
2837 Main Street
2885 Main Street
2917 Main Street
3080 Main Street
3233 Main Street
3275 Main Street

The following properties have been evaluated for this project and determined eligible for listing on the State and National Registers of Historic Places:

districts

The Central Park Historic District
The University Heights Commercial Historic District

individuals

2365 Main Street
2554 Main Street
2580 Main Street
2720-28 Main Street
2730 Main Street
2779 Main Street
2968 Main Street
3105 Main Street
3107 Main Street
3124-26 Main Street
3191 Main Street
3208-12 Main Street
3214-16 Main Street
3404 Main Street
3442 Main Street
3484 Main Street
3500 Main Street
2 University Avenue
Grover Cleveland Golf Course buildings at Main and Bailey

The architectural and historical significance of these properties is documented in the Cultural Resource Survey report.

In addition, the OPRHP has concerns about potential project impacts on the following objects and features:

-The entrance gates at University Avenue, Allenhurst Road, and Capen Boulevard.
-The monument at 2253 Main Street.
-The Veterans Memorial at the northeast corner of Main and Bailey.
-The brick roads at Niagara Falls Boulevard and Northrup Avenue.

The OPRHP has no concerns regarding any other properties within the project area.

If you have any questions concerning eligibility determinations, please call Robert Kuhn at (518) 237-8643 ext. 255.

OFFICE OF PARKS · RECREATION · HISTORIC PRESERVATION
NEW YORK STATE

Bernadette Castro
Commissioner

New York State Office of Parks, Recreation and Historic Preservation
Historic Preservation Field Services Bureau
Peebles Island, PO Box 189, Waterford, New York 12188-0189 518-237-8643

August 7, 1996

NYS DOT, Region 5
Cleo Jones
Buffalo State Office Building
125 Main Street
Buffalo, NY 14203

Dear Ms. Jones:

RE: DOT
Main St Reconstruction/NY 5
PIN 5034.93.101
Buffalo/Amherst, Erie County
96PR1716

Thank you for requesting the comments of the Office of Parks, Recreation and Historic Preservation (OPRHP) concerning your project's potential impact/effect upon historic and/or prehistoric cultural resources. The documentation which you provided on your project has been reviewed by our staff. Preliminary comments and/or requests for additional information are noted on separate attachments accompanying this letter. A determination of impact/effect will be provided only after ALL documentation requirements noted on any attachments have been met. Any questions concerning our preliminary comments and/or requests for additional information should be directed to the appropriate staff person identified on each attachment.

In cases where a state agency is involved in this undertaking, it is appropriate for that agency to determine whether consultation should take place with OPRHP under Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law. In addition, if there is any federal agency involvement, Advisory Council on Historic Preservation's regulations, "Protection of Historic and Cultural Properties" 36 CFR 800 require that agency to initiate consultation with the State Historic Preservation Officer (SHPO).

When responding, please be sure to refer to the OPRHP Project Review (PR) number noted above.

Sincerely,

Ruth L. Pierpont

Ruth L. Pierpont
Director, Historic Preservation
Field Services Bureau

RLP:cm

attachments: [*] Archeology Comments
[*] State/National Registers of Historic Places Eligibility Comments

cc: Mary Ivey

ARCHEOLOGY COMMENTS

96 PR 1716

Based upon a review of the Cultural Resource Survey Report for PIN 5034.93.101 the Office of Parks, Recreation and Historic Preservation (OPRHP) concurs with the archeological recommendations of the report. OPRHP has no concerns regarding potential project impacts on archeological resources within the project area. No additional archeological investigations are warranted for this project.

If you have any questions concerning archeology, please call Robert Kuhn at (518) 237-8643 ext. 255.

APPENDIX C

SITE INVESTIGATION REPORT FOR BEDC PROPERTY
at
300 AMHERST STREET

PHASE I ENVIRONMENTAL SITE ASSESSMENT
for Buffalo Enterprise Development Corp.

300 East Amherst Street
Buffalo, New York 14214

STERLING ENVIRONMENTAL SERVICES, INC.

October 31, 1996

TABLE OF CONTENTS

XI APPENDIX

1. ERIIS Report
2. Interviews
3. Aerial Photographs
4. USGS Maps
5. Sanborn Maps
6. Lab Results
7. Excerpts from Title Search
8. Inactive Hazardous Waste Disposal Report - Bell Aerospace Textron
9. Hazardous Substance Waste Disposal Site - LaSalle Reservoir

I SUMMARY

Sterling Environmental Services, Inc. was retained by Buffalo Enterprise Development Corp. to perform a Phase I Environmental Site Assessment on the property on 300 East Amherst Street, in Buffalo, New York 14214. The property consists of a 1.03 acre lot with a 3195 ft^2 building. This site assessment was performed following ASTM Standards on Environmental Site Assessments for Commercial Real Estate, E 1527-94.

II INTRODUCTION

II.1 Purpose

The purpose of this Phase I Environmental Site Assessment is to identify, to the extent feasible, recognized environmental conditions in connection with the property in Buffalo, NY 14214.

II.2 Special Terms and Conditions

This assessment considered the potential risk on the site due to hazardous substances, petroleum products, as per the ASTM Standard, and friable asbestos and 2 soil samples analyzed for a selected list of constituents. Radon, lead-based paint, lead in drinking water, and wetlands were not included in the scope of this assessment.

The site, that is the object of this Phase I, located at 300 East Amherst Street, in Buffalo, NY will be referred to as the "Property" in this report. In addition, the property known as 300 East Amherst Street has also been listed as 286 and 288 East Amherst Street. Any raw information referring to these addresses can be applied to the property.

II.3 Limitations and Exceptions of Assessment

All ASTM Standards on Environmental Site Assessment for Commercial Real Estate, as per E 1527-94, were followed. All required sources were consulted.

II.4 Limiting Conditions and Methodology Used

At the time of the site visit, there were no unusual limiting conditions. Since the Property is vacant, all of the site was accessible. The entire site was observed. The weather was clear and there were no physical encumbrances present.

III SITE DESCRIPTION

III.1 Location and Legal Description

The location of the site is in Buffalo, New York 14214.

The legal description from May 27, 1969 is as follows: "All that plot of land situated in the City of Buffalo, County of Erie, and State of New York being part of Lot No. 45 , Township 11, Range 8 of the Holland Land Company's Survey bounded and described as follows: Beginning at a point of intersection of the northerly line of Amherst Street with the northeasterly line of lands of Delaware Lackawanna and Western Railroad Company; running thence northwesterly along said northeasterly line of lands said Railroad Company one hundred ninety-eight and twenty-three hundredths (198.23) feet to a point in said line which would be intersected by the southerly line of Berkshire Avenue extended as shown on map of Berkshire Terrace filed in Erie County Clerks's office under cover number 885; running thence easterly along said extended southerly line of Berkshire Avenue as shown by said map two hundred forty-seven and sixty-nine hundredths (247.69) feet to a point; thence southeasterly and parallel with the first mentioned boundary two hundred seven and seventy-six hundredths (207.76) feet to the northerly line of Amherst Street and thence westerly along the northerly line of Amherst Street two hundred fifty-one and nine hundredths (251.09) feet to the point of beginning.

Excepting that part conveyed by deed recorded in the Erie County Clerk's Office in Liber 4082 of Deeds at page 172."

III.2 Site and Vicinity Characteristics

The site is irregular in shape and is approximately 253 feet by 178 feet and is located in an industrial/residential area in the City of Buffalo. The terrain of the site and area is flat with an elevation of about 650 ft. The nearest surface water is the LaSalle Reservoir bordering the property to the east. The depth to bedrock for this site is estimated to be about three feet. Bedrock outcrops can be seen at the south edge of the property in the road cut.

III.3 Description of Structures, Roads, or Improvements on Site

There is one building located on the property. The one-story building is constructed of concrete blocks and was built during the early 1950's, according to Sanborn maps (see Appendix XI.5). The building has 475 ft^2 devoted to office space, with the remaining space being used as a warehouse. There is also a small loft area above the offices, which is accessible from the warehouse.

The front door faces East Amherst Street and enters into the offices. In front of the building is an asphalt parking area. Adjacent to the office entrance is a large overhead door that is presently blocked over and not accessible from the outside. All the windows, except for one at the top of the building and two by the office entrance, are either blocked or boarded up. A heavy-duty chain link

fence with barbed wire surrounds most of the property, except for the parking area. Access to the property is through the office, or a gate on the eastern edge of the property.

The north side of the building also contains a large overhead door. This door provides access to the "yard" area of the property from the warehouse. The yard has multiple concrete pads along the edges of the property remaining from older buildings or sheds. The yard is covered in gravel and small brush.

In the center of the warehouse, and just outside the northern overhead doors are floor drains. They both lead to the City of Buffalo sewer system. In the bottom of each drain are several inches of sediment. The potable water supply for the site is public water from the City of Buffalo. The sewer system is also maintained by the City of Buffalo. The exact age of the system is unknown. The building is heated by forced air natural gas. Electric and gas lines extend to the building, but were disconnected at the time of the site reconnaissance.

III.4 Information Reported by Client

No information related to possible recognized environmental conditions with the Property was reported by the Client.

III.5 Current Uses of the Property

Currently, the property is vacant and is not in use.

III.6 Past Uses of the Property

Previous to 1877, the property had been used for agriculture. In 1877, the Buffalo Cement Company, acquired the property as part of a larger parcel that was used to manufacture and sell hydraulic cement. The Buffalo Cement Company owned a large parcel of property and how each section of the parcel was used is unknown. By 1902, Buffalo Cement Company was selling crushed stone from their property.

In 1923, Clinton M. Ross purchased the subject property from Buffalo Crushed Stone. By 1931, he was operating a construction equipment yard on site. That parcel later became known as 300 E. Amherst Street.

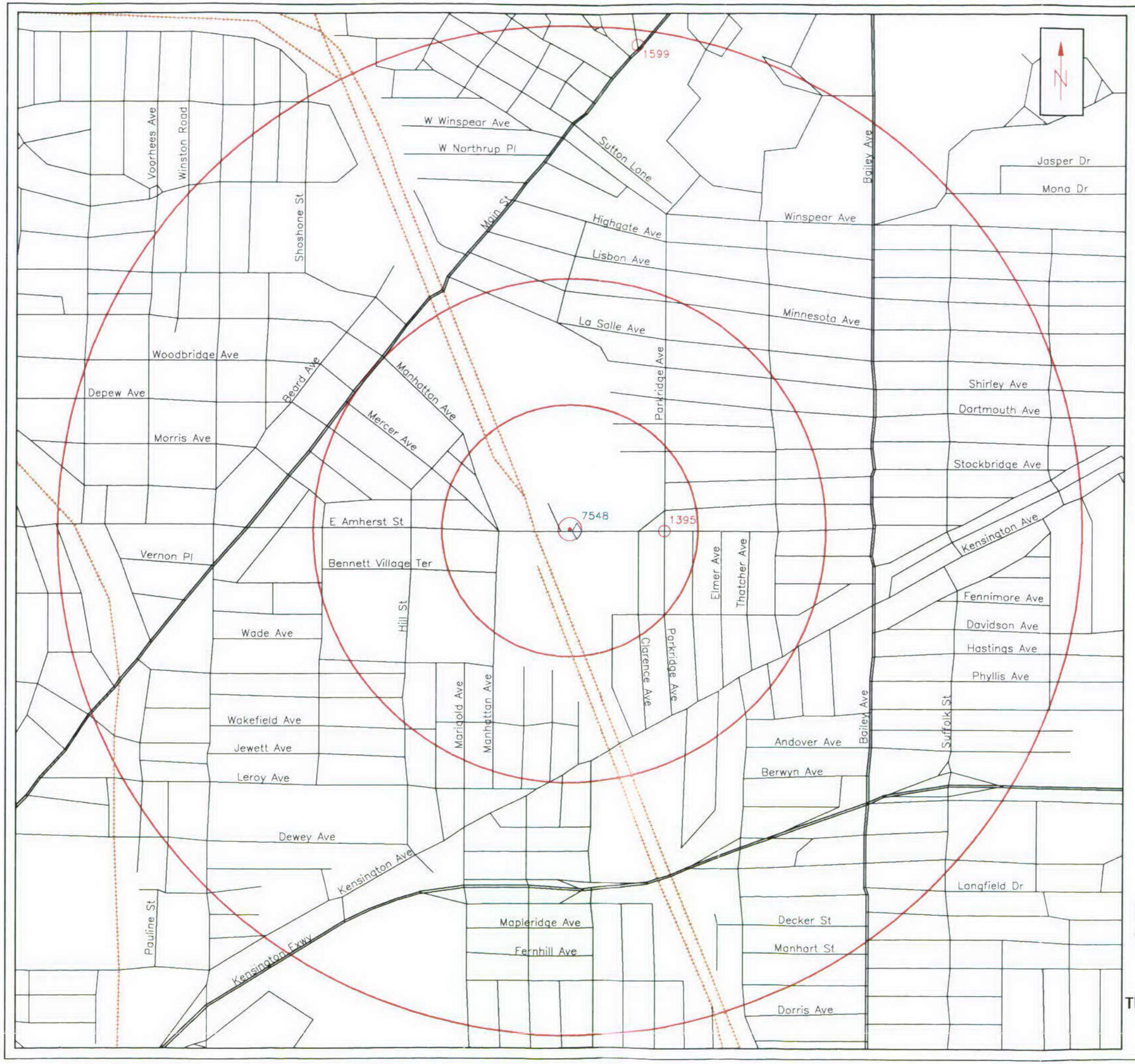
Listed below are the various tenants of the site and their type of business while they occupied the site. As shown, at times more than one business operated from the site.

Years of Occupancy	Name of Tenant	Type of Business
1991 - 1996	Aluma Systems	scaffolding
1984 - 1990	Buffalo Toi-lets Inc.	rentals and service
1961 - 1990	Theo J. Skarbowski	construction equipment
1935 - 1961	Lloyd G. Ross	machinery dealers construction equipment road construction
1939 - 1952*	Wetherald H. Equipment Co.	construction equipment
1934 - 1936*	Floyd Heitman	unknown
1931 - 1939*	Clinton M. Ross	construction equipment

* - exact dates uncertain, some years of information unavailable

III.7 Current and Past Uses of Adjoining Properties

To the west of the property is the Erie Lackawanna Rail Road. It became a railroad right of way in 1870. This section of track is now abandoned and no longer in use. Previous to the railroad, the property was agricultural. To the north of the site is Joe McCarthy Park. The park was built upon an old gravel quarry operated by Buffalo Crushed Stone. The quarry was filled with various materials, including: municipal refuse, incinerator ash, C & D debris,



ERIS

505 Huntmar Park Dr, Suite 200
Herndon, VA 22070
(703)834-0600 (800)989-0402
FAX: (703)834-0606

SITE INFORMATION

300 East Amherst
Buffalo, NY
Erie County
Job Number: 114203A
Map Plotted: Sep 26, 1996

MAP LEGEND

- Site
- Radii .25, .5, 1 Mi
- Railroads
- Roads
- Highways
- NPL 0 Sites
- RCRIS_TS 0 Sites
- CERCLIS 0 Sites
- NFRAP 0 Sites
- RCRIS_LG 0 Sites
- RCRIS_SG 0 Sites
- ERNS 0 Sites
- HWS 2 Sites
- LRST 0 Sites
- SWF 0 Sites
- PBS 1 Site
- MOSF 0 Sites
- CBS 0 Sites

Miles

0 0.25 0.5

household appliances, tree limbs, paint waste mixed with sawdust, floor sweepings, and refuse from Buffalo Forge Co. prior to becoming a park.

To the east is the LaSalle Reservoir. It is used as a catch basin for surface water by the City of Buffalo. The reservoir was originally part of the quarry created by Buffalo Crushed Stone. Across the street to the south is the Enterprise Industrial Center. Previously, it was a Harrison Radiator manufacturing facility.

III.8 Site Map

-see next page

IV RECORDS REVIEW

IV.1 Standard Environmental Record Sources, Federal and State

The following resources were used in this Environmental Site Assessment:

Federal NPL site list as of 5/1/96
Federal CERCLIS list, as of 5/1/96
Federal RCRA TSD facilities list, as of 5/10/96
Federal RCRIS large quantity generators list, as of 5/10/96
Federal RCRIS small quantity generators list, as of 5/10/96
Federal ERNS list, as of 12/31/95
Federal NFRAP list, as of 5/1/96
New York Inactive Hazardous Waste Disposal Sites, as of 8/8/95
New York Leaking Storage Tanks, as of 8/29/95
New York Active Solid Waste Facility Register, as of 6/30/96
New York Chemical Bulk Storage Tanks, as of 5/16/96
New York Major Oil Storage Facilities, as of 5/16/96
New York Petroleum Bulk Storage Tanks, as of 5/14/96

These listings identified three locations within the ASTM required search perimeter, however one was misplotted by ERIIS and is actually located outside the search perimeter. They are as follows:

New York Petroleum Bulk Storage Tanks

7548 - Enterprise Industrial Center, 317 E. Amherst - 0.014 miles from the site, there are six AST's with a capacity of 51589 gal. They are empty and temporarily out of service.

New York Inactive Hazardous Waste Disposal Sites

1395 - Lasalle Reservoir - Adjacent to the site, it is listed as a Hazardous Substance Waste Disposal Site by New York State.

1599 - Bell Aerospace - Textron - this site is listed as being 0.972 miles from the site, but the information is incorrect. This site is in Niagara Falls, NY and not within the ASTM search perimeter.

IV.2 Physical Setting Sources

The following physical setting sources were referenced for this report:
USGS map - Buffalo NE/7.5 1950, 1956, 1958, 1965 & 1967
Aerial photographs from 1951, 1960 and 1990 from the Erie County Department of Environment and Planning

Based upon these record sources, it has been determined that the site is at an elevation of 650 feet. The latitude of the site is 42.940114, with a longitude of -78.825255. The terrain is flat with a few small trees and vegetation. Groundwater maps for the area were unavailable.

IV.3 Historical Use Information

In order to obtain the past uses of the property, the following sources were used:
Aerial photographs from 1951, 1960, and 1990 from the Erie County Department of Environment and Planning
Historical USGS maps from 1950, 1956, 1958, 1965 and 1967
Sanborn maps from 1916, 1935, 1950, 1963, and 1986.
Title search of property from 1969.
City of Buffalo Building Permits
City of Buffalo Directories 1931 - 1993*
Haines Directories 1990 - 1994

* Some years of City of Buffalo Directories missing.

V INFORMATION FROM SITE RECONNAISSANCE AND INTERVIEW

V.1 Hazardous Substances in Connection with Identified Uses

Based upon observation and information obtained, there is evidence that paint and petroleum products were used or stored on site.

V.2 Hazardous Substance Containers and Unidentified Substance Containers

The following hazardous substances were observed during the site reconnaissance:

Container(s)	Potential Hazardous Substance
55 gallon drum	red paint, flammable
one gallon bottle	unknown liquid
3 automotive batteries	lead acid batteries
5 gallon can	cleaner
2 one gallon cans	muriatic acid
one gallon can	aluminum paint
one gallon can	Easy-glo floor finish
one gallon can	Lev- L- Astic binder
2 one gallon cans	coil conditioner - muriatic acid

Two empty drums, one closed head 55 gallon and a thirty gallon open head, were found outside, behind the building. There were no labels or markings on the drums and they were corroded. The 55 gallon drum was standing upright with both bungs removed and the thirty gallon was on its side with no lid. No sheen or staining was observed on surrounding soils. Vegetation in the area was unaffected.

V.3 Storage Tanks

There was no evidence observed during the site reconnaissance indicating the presence of any such tanks on the site. During the interview with the owner, he identified the use of a 250 gallon portable tank. The diesel tank was on a pad near the north side of the property for a short period of time.

V.4 Indication of PCBs

During the site reconnaissance, an exposed fluorescent light ballast was found in the storage room off the warehouse. The ballast appeared to be

intact, uncorroded, and showed no signs of leaking. There were no identifiable markings on the ballast, but based upon its age it is assumed to contain PCBs.

V.5 Indication of Solid Waste Disposal

Based upon information obtained from listings of solid waste disposal sites, there is no indication, that solid waste was disposed on the property. Adjacent to the site, on the rail road property, several discarded empty drums and piles of other solid waste were observed during the site reconnaissance. McCarthy park to the north was a solid waste landfill in the past.

VI ASBESTOS INSPECTION

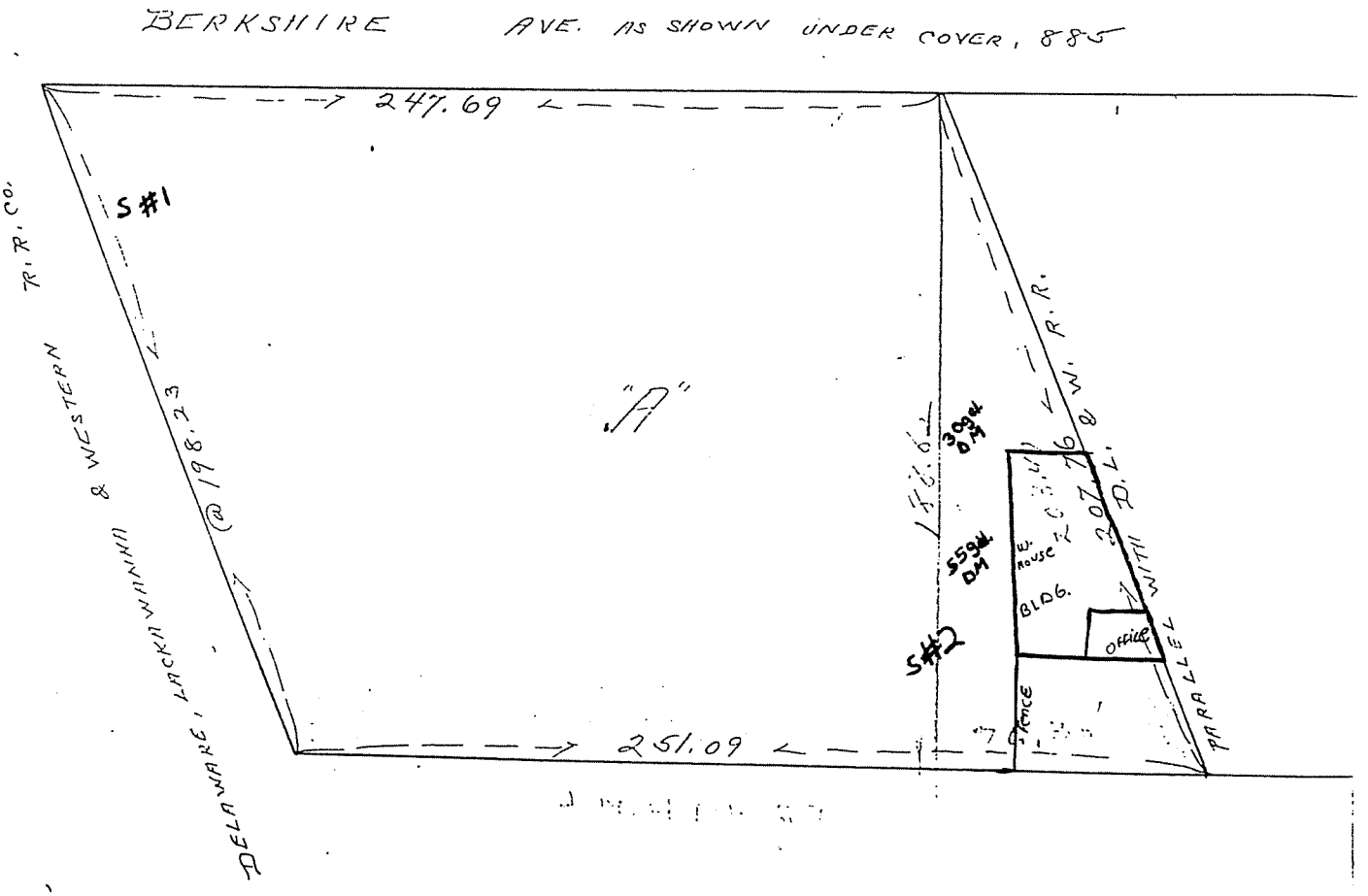
During the asbestos inspection two friable substances were identified to possibly be asbestos-containing materials. They are the wall board on the east wall of the warehouse and the ceiling panels in the storage room connected to the warehouse. Both materials were sampled and analyzed by PLM. The results indicate that neither substance contains asbestos (see lab results Appendix XI.6).

VII SOIL SAMPLING

During the site reconnaissance two soil samples were taken (for approximate locations see site sketch - next page) from a depth of 6" to 12". The samples were analyzed for TCL Volatile Organics, TCL Semivolatile Organics, TCL Pesticides/PCB's, TAL Metals and Total Cyanide. Complete laboratory results are in Appendix XI.6.

Sample #1 was taken along the western edge of the property, about five feet from the fence. This location was chosen due to the solid waste observed on the neighboring property. Sample #2 was taken near the empty 55 gallon drum found to the west of the building.

Site Sketch



Scale 1" = 50'

The following constituents exceed NYS Soil Cleanup levels based upon TAGM HWR-94-4046.

	Sample #1	Sample #2	Cleanup Level
Volatile Organics (ppb)			
Acetone	240	506	200
Methylene Chloride	350	260	100
Semivolatile Organics (ppb)			
Benzo-(a)anthracene		570	224
Chrysene		570	400
Benzo-(a)pyrene		660	61
Metals* (ppm)			
Arsenic		23.3	3 - 12
Cadmium		1.10	0.1 - 1
Calcium		58,300	130 - 35,000
Chromium		47.9	1.5 - 40
Copper		134	1 - 50
Magnesium		15,700	100 - 5,000
Mercury	0.747	0.533	0.001 - 0.2
Nickel		47.0	0.5 - 25
Zinc	336	564	9 - 50

*Please Note: The actual NYS cleanup levels for metals are based upon individual site background levels. Lacking this data, the metals featured in the previous table are the ones that exceeded the upper limit of the background levels commonly found in New York State or the eastern United States. These levels are an environmental concern.

In addition, the following list shows metal levels which were detected within the range of background levels, but may still be an environmental concern.

Metal (ppm)	Sample #1	Sample #2
Antimony	5.7	
Arsenic	8.6	
Barium	62.3	174
Calcium	9,580	
Chromium	11.3	
Iron	13,100	64,200
Lead		271
Magnesium	6,630	
Manganese	867	637
Nickel	16.3	

VIII OPINION

Opinion of Impacts

The environmental professional(s) who have conducted the site visit and reviewed the results of the data collection effort have concluded that the following are "recognized environmental conditions" which may have the following range of qualitative impacts on the soil and water resources or structures on the subject property.

It is up to the user (client) based on his or her risk tolerance, fiduciary responsibility or the applicable law, to determine the extent of further inquiry.

Recognized Environmental Conditions	Potential Impacts
Two empty drums in yard	Low Risk

The drums may have been empty when placed in the yard. There was no visual evidence to the contrary. Hazardous substances have been used on the property and it is possible the drums were full when placed in the yard and leaked out over the years. If this were the case however, higher levels of contaminants would have been expected in sample #2. The random placement in the open areas of the yard and the drums being open indicates they were probably empty.

Light Ballast — Diminimis

250 gallon diesel tank — Unknown*

Being a small storage tank on a pad it is unlikely that significant leakage occurred undetected. The pad was not diked and the possibility of spillage from filling and fueling exists. No evidence of petroleum contamination was visually observed or found in either soil sample. However, neither soil sample was in close proximity to the tanks previous location.

Hazardous Substances — Unknown*

Since the original site reconnaissance on October 7th, all hazardous substances have been removed from the property by the previous tenant, according to the realtor, Fred Fabiniak. The 55 gallon drum of solvent-based paint and the owner interview indicate painting operations have occurred on the property. Most painting operations generate hazardous waste solvents. Prior management practices for any such waste is unknown.

Adjoining properties — Unknown*

The properties surrounding the site all have questionable pasts from an environmental point of view. Contaminants may have migrated onto this site via air, surface runoff, and/or groundwater.

Soil Sampling — Unknown*

The sampling results indicate soil contamination above generally accepted levels. The two samples taken and analyzed are not sufficient to adequately characterize the site.

Note * These are Recognized Environmental Conditions whose impact on the subject site property is unknown due to a lack of sufficient evidence upon which to base an informed opinion.

IX FINDINGS AND CONCLUSIONS

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-94 of the 300 East Amherst Street in Buffalo, New York, the property. Any exception to, or deletions from, this practice are described in Section II.3 of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the property except for the following: (list)

Hazardous substances (see Section V.2)
Adjoining Properties (see Section III.7)
Soil Sampling (see Section VII)

X SIGNATURE(S) AND QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONAL(S) PARTICIPATING IN PHASE I ENVIRONMENTAL SITE ASSESSMENT

Wayne K. Cameron, CHMM

Kevin P. Janik, Asbestos Certificate - 96-05138

Qualifications:

Wayne K. Cameron, CHMM - Site reconnaissance, data interpretation, summary and conclusion

Wayne is a Certified Hazardous Materials Manager at the Master level with fifteen years of environmental experience. Prior to that he worked as an industrial engineer. He has a BS degree in Chemistry and Economics from Allegheny College, Phi Beta Kappa. Wayne specializes in environmental regulatory issues and consulting and is a member of ASTM Committee E-50 on Environmental Site Assessment.

Kevin Janik - Records review and compilation, site reconnaissance, asbestos inspection and report preparation

Kevin has a M.S. in Environmental Engineering from Montana Tech of the University of Montana and a B.S. in Business Administration from the State University of New York at Buffalo. Kevin has one year of experience in the environmental field.

XI APPENDIX

1. ERIIS Report
2. Interviews
3. Aerial Photographs
4. USGS Maps
5. Sanborn Maps
6. Lab Results
7. Excerpts from Title Search
8. Inactive Hazardous Waste Disposal Report - Bell Aerospace Textron
9. Hazardous Substance Waste Disposal Site - LaSalle Reservoir

PERTAINING TO:
300 EAST AMHERST
BUFFALO, NY 14215

REPORT NUMBER:
114203A

PREPARED ON:
09/30/1996

ON BEHALF OF:
Sterling Environmental Srvs, Inc.
1372 Clinton Street
Buffalo, NY 14206

If you have any questions or comments regarding this report, please contact ERIIS Customer Service at 1-800-989-0403, locally at 703-834-0600, or fax us at 703-834-0606. Thank you for your order.

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ERIIS REPORT OVERVIEW

The following features are available for an ERIIS report:

* Database Report
    * Statistical Profile
    * Database Records
* Related Maps
    * Digital Custom Plotted Map
    * Sanborn Fire Insurance Map(s)
    * Topographical Map(s)

Statistical Profile

The statistical profile is an at-a-glance numeric summary of the databases searched for your ERIIS Report.

Database Records

The detailed federal and state database information indicates potential and actual environmental threats within the study radius. These records are sorted by their distance from the study site.

Digital Custom Map

The digital custom map is cross referenced with the database records. The cross-in-circle in the center of the map represents the study site. The red circles represent distances from the study site. The plottable sites in the report are distinguished on the map by symbols of different shape and color.

Historic Fire Insurance Maps

The ERIIS collection of historical Sanborn Fire Insurance Maps covers 14,000 cities and towns. These maps may indicate prior use of the study site. If no maps are available for the study site, a notice to that effect is included. This notice should serve as evidence of due diligence.

Topographical Map

USGS topographical maps show natural and man-made features as well as the shape and elevation of the terrain. The 7.5 minute quad maps are produced at a scale of 1:24,000, or one inch represents 2,000 feet.

If you have any questions about this report,
please contact ERIIS Customer Service at 1-800-989-0403

ERIIS ASTM STATISTICAL PROFILE
State: NY

ERIIS Report #114203A

Sep 26, 1996

Site:
300 EAST AMHERST
BUFFALO, NY 14215

Latitude: 42.940114
Longitude: -78.825255

Database	Radius (Mi)	Property Area**	Property-1/4	1/4-1/2	1/2-1	>1	TOTAL
NPL	1		0	0	0		0
RCRIS_TS	1		0	0	0		0
CERCLIS	.5		0	0			0
NFRAP	.5		0	0			0
RCRIS_LG	.25		0				0
RCRIS_SG	.25		0				0
ERNS	.05		0				0
HWS	1		1	0	1		2
LRST	.5		0	0			0
SWF	.5		0	0			0
CBS	.25		0				0
MOSF	.25		0				0
PBS	.25	X	1				1
			2	0	1	0	3

Radon Zone Level: 1

Zone 1 has a predicted average indoor screening level > than 4 pCi/L

A Radon Zone should not be used to determine if individual homes need to be tested for radon.
The EPA's Office of Radiation and Indoor Air (202/233-9320) recommends that all homes be tested for radon, regardless of geographic location or the zone designation in which the property is located.

**A property is defined as a .05 mile buffer around the site's latitude and longitude.

A blank radius count indicates that the database was not searched by this radius per client instructions.

NR in a radius count indicates that the database cannot be reported by this search criteria due to insufficient and/or inaccurate addresses reported by a federal/state agency.

NPL
Date of Data: 05/01/1996
Release Date: 05/13/1996
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
703/603-8881

National Priorities List

The NPL Report, also known as the Superfund List, is an EPA listing of uncontrolled or abandoned hazardous waste sites. The list is primarily based upon a score which the site receives from the EPA's Hazardous Ranking System. These sites are targeted for possible long-term remedial action under the Superfund Act of 1980.

RCRIS_TS
Date of Data: 05/10/1996
Release Date: 06/10/1996
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
202/260-4610

Resource Conservation and Recovery Information System - Treatment, Storage, And Disposal Facilities

The RCRIS_TS Report contains information pertaining to facilities which either treat, store, or dispose of EPA regulated hazardous waste. The following information is also included in the RCRIS_TS Report:
- Information pertaining to the status of facilities tracked by the RCRA Administrative Action Tracking System (RAATS)
- Inspections & evaluations conducted by federal and state agencies
- All reported facility violations, the environmental statute(s) violated, and any proposed & actual penalties
- Information pertaining to corrective actions undertaken by the facility or EPA
- A complete listing of EPA regulated hazardous wastes which are generated or stored on-site

CERCLIS
Date of Data: 05/01/1996
Release Date: 05/13/1996
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
703/603-8730

Comprehensive Environmental Response, Compensation, and Liability Information System

The CERCLIS Database is a comprehensive listing of known or suspected uncontrolled or abandoned hazardous waste sites. These sites have either been investigated, or are currently under investigation by the U.S. EPA for the release, or threatened release of hazardous substances. Once a site is placed in CERCLIS, it may be subjected to several levels of review and evaluation, and ultimately placed on the National Priorities List (NPL). As of February 1995, CERCLIS sites designated "No Further Remedial Action Planned" (NFRAP) have been removed from the CERCLIS Database.

NFRAP
Date of Data: 05/01/1996
Release Date: 05/13/1996
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
703/603-8881

No Further Remedial Action Planned Sites

The No Further Remedial Action Planned Report (NFRAP), also known as the CERCLIS Archive, contains information pertaining to sites which have been removed from the U.S. EPA's CERCLIS Database. NFRAP sites may be sites where, following an initial investigation, either no contamination was found, contamination was removed quickly without need for the site to be placed on the NPL, or the contamination was not serious enough to require federal Superfund action or NPL consideration.

RCRIS_LG
Date of Data: 05/10/1996
Release Date: 06/10/1996
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
202/260-4610

Resource Conservation and Recovery Information System - Large Quantity Generators

The RCRIS_LG Report contains information pertaining to facilities which either generate more than 1000kg of EPA regulated hazardous waste per month, or meet other applicable requirements of the Resource Conservation And Recovery Act. The following information is also included in the RCRIS_LG Report:
- Information pertaining to the status of facilities tracked by the RCRA Administrative Action Tracking System (RAATS)
- Inspections & evaluations conducted by federal and state agencies
- All reported facility violations, the environmental statute(s) violated, and any proposed & actual penalties
- Information pertaining to corrective actions undertaken by the facility or EPA
- A complete listing of EPA regulated hazardous wastes which are generated or stored on-site

RCRIS_SG
Date of Data: 05/10/1996
Release Date: 06/10/1996
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
202/260-4610

Resource Conservation and Recovery Information System - Small Quantity Generators

The RCRIS_SG Report contains information pertaining to facilities which either generate between 100kg and 1000kg of EPA regulated hazardous waste per month, or meet other applicable requirements of the Resource Conservation And Recovery Act. On advice of the U.S. EPA, ERIIS does not report so-called "RCRA Protective Filers." Protective Filers, commonly called Conditionally Exempt Small Quantity Generators (CESQG's), are facilities that have completed RCRA notification paperwork, but are not, in fact, subject to RCRA regulation. The determination of CESQG status is made by the U.S. EPA. The following information is also included in the RCRIS_SG Report:
- Information pertaining to the status of facilities tracked by the RCRA Administrative Action Tracking System (RAATS)
- Inspections & evaluations conducted by federal and state agencies
- All reported facility violations, the environmental statute(s) violated, and any proposed & actual penalties

- Information pertaining to corrective actions undertaken by the facility or EPA
- A complete listing of EPA regulated hazardous wastes which are generated or stored on-site

ERNS
Date of Data: 12/31/1995
Release Date: 03/18/1996
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
202/260-2342

Emergency Response Notification System - 1995

ERNS is a national computer database system that is used to store information concerning the sudden and/or accidental release of hazardous substances, including petroleum, into the environment. The ERNS Reporting System contains preliminary information on specific releases, including the spill location, the substance released, and the responsible party. Please note that the information in the ERNS Report pertains only to those releases that occured between January 1, 1995 and December 31, 1995.

HWS
Date of Data: 08/08/1995
Release Date: 08/16/1995
NY Dept. of Environmental Conservation
Hazardous Waste Remediation Division
518/457-0747

New York Inactive Hazardous Waste Disposal Sites

The New York Inactive Hazardous Waste Disposal Sites List contains summary information pertaining to those facilities that are deemed potentially hazardous to the public health and welfare by the New York State Department of Environmental Conservation (NYSDEC).

LRST
Date of Data: 08/29/1995
Release Date: 09/18/1995
NY Dept. of Environmental Conservation
Spill Prevention and Response Section
518/457-7363

New York Leaking Storage Tanks

The New York Leaking Storage Tank Report is a comprehensive listing of all leaking storage tank cases reported to The New York State Department of Environmental Conservation which have not yet been resolved. The information for the LST Report is extracted from the original spills list provided to ERIIS by the NYSDEC. Information pertaining to leaking storage tank cases which have been resolved can be provided upon request.

SWF
Date of Data: 06/30/1996
Release Date: 08/12/1996
NY Dept. of Environmental Conservation
Bureau of Solid Waste
518/457-2051

New York Active Solid Waste Facility Register

The New York Solid Waste Facility Register is a comprehensive listing of all active and inactive permitted solid waste landfills and processing facilities within the State of New York.

CBS
Date of Data: 05/16/1996
Release Date: 05/22/1996
NY Dept. of Environmental Conservation
Spill Prevention and Response Section
518/457-7363

New York Chemical Bulk Storage Tanks

The New York Chemical Bulk Storage Report contains information pertaining to active and inactive facilities that store regulated substances in aboveground storage tanks with capacities of 185 gallons or greater, and/or underground storage tanks of any size.

MOSF
Date of Data: 05/16/1996
Release Date: 05/22/1996
NY Dept. of Environmental Conservation
Spill Prevention and Response Section
518/457-7363

New York Major Oil Storage Facilities

The Major Oil Storage Facilities Report contains summary information on active and inactive facilities with petroleum storage capacities in excess of four-hundred thousand gallons.

PBS
Date of Data: 05/14/1996
Release Date: 05/22/1996
NY Dept. of Environmental Conservation
Spill Prevention and Response Section
518/457-7363

New York Petroleum Bulk Storage Tanks

The New York Petroleum Bulk Storage Report is a comprehensive listing of all reported active and inactive facilities that have petroleum storage capacities in excess of 1100 gallons, and less than four hundred thousand gallons. ERIIS has obtained the PBS information from the Delegated Counties in the State of New York. The dates of The information for the specific counties are as follows:

Cortland	06/10/96
Nassau	06/27/96
Rockland	05/15/96
Suffolk	01/12/96

ERIIS SUMMARY OF PLOTTABLE SITES

ERIIS Report #114203A — Sep 26, 1996

ERIIS ID.	FACILITY/ADDRESS	DATABASE	DISTANCE FROM SITE	DIRECTION FROM SITE	MAP ID
	0 - 1/4 Miles				
36048047548	ENTERPRISE INDUSTRIAL CENTER 317 E AMHERST ST BUFFALO, NY 14215-1529 COUNTY: ERIE	PBS	0.014 Mi	SOUTHEAST	7548
36053001395	LASALLE RESERVOIR PARKRIDGE AVENUE AND EAST AMHERST STREET BUFFALO, NY 14214 COUNTY: ERIE	HWS	0.185 Mi	SOUTHEAST	1395
	1/2 - 1 Miles				
36053001599	BELL AEROSPACE - TEXTRON 1 NIAGARA FALLS BLVD BUFFALO, NY 14214-1214 COUNTY: ERIE	HWS	0.972 Mi	NORTHEAST	1599

ERIIS ID / PBS NO. / CBS NO.	FACILITY / ADDRESS	CONTACT NAME / PHONE	SITE STATUS / FACILITY TYPE	NO. OF TANKS / CAPACITY (GAL)	CERTIFICATE DATE / EXPIRATION DATE	MAP ID
36048047548 9-600196	ENTERPRISE INDUSTRIAL CENTER 317 E AMHERST ST BUFFALO, NY 14215-1529 DISTANCE FROM SITE: 0.014 MILES DIRECTION FROM SITE: SOUTHEAST	BRIAN SCHECTMAN (716) 838-0700	ACTIVE OTHER	6 51589	03/06/1995 03/06/1900	7548

TANK ID	INSTALL DATE	CAPACITY (GALLONS)	PRODUCT STORED	TANK STATUS	TANK TYPE	TANK LOCATION
301	08/72	25000	EMPTY	TEMPORARILY OUT-OF-SERVICE	STEEL/CARBON STEEL	ABOVEGROUND
302	08/72	25000	EMPTY	TEMPORARILY OUT-OF-SERVICE	STEEL/CARBON STEEL	ABOVEGROUND
304	07/70	550	EMPTY	TEMPORARILY OUT-OF-SERVICE	STEEL/CARBON STEEL	ABOVEGROUND
305	09/73	563	EMPTY	TEMPORARILY OUT-OF-SERVICE	STEEL/CARBON STEEL	ABOVEGROUND
306	09/73	295	EMPTY	TEMPORARILY OUT-OF-SERVICE	STEEL/CARBON STEEL	ABOVEGROUND
307	09/73	181	EMPTY	TEMPORARILY OUT-OF-SERVICE	STEEL/CARBON STEEL	ABOVEGROUND

ERIIS ID / EPA ID / SITE CODE	FACILITY	ADDRESS	OWNER / OWNER ADDRESS	MAP ID
36053001395 NYD002106276 915033	LASALLE RESERVOIR DISTANCE FROM SITE: 0.185 MILES DIRECTION FROM SITE: SOUTHEAST	PARKRIDGE AVENUE AND EAST AMHERST STREET BUFFALO, NY 14214 COUNTY: ERIE	CITY OF BUFFALO ROOM 201 CITY HALL BUFFALO, NY	1395
	CLASSIFICATION: NOT REPORTED			
36053001599 932052	BELL AEROSPACE - TEXTRON DISTANCE FROM SITE: 0.972 MILES DIRECTION FROM SITE: NORTHEAST	1 NIAGARA FALLS BLVD BUFFALO, NY 14214-1214 COUNTY: ERIE	BELL AEROSPACE TEXTRON PO BOX 1 NIAGARA FALLS, NY	1599
	CLASSIFICATION: SIGNIFICANT THREAT - ACTION REQUIRED			

ERIIS ID / EPA ID	FACILITY	FACILITY ADDRESS
36039000638 NYD980534606	LASALLE RESERVOIR COUNTY: ERIE	EAST AMHERST ST BUFFALO, NY 14215

SITE EVENT(S)	COMPLETE DATE
DISCOVERY	04/15/80
PRELIMINARY ASSESSMENT	03/17/86
SCREENING SITE INSPECTION	06/27/91
NOT REPORTED	09/21/95

TELEPHONE INTERVIEW/INFORMATION

Date:	October 10, 1996
Time:	1:00 PM
Name:	Chris Smith
Position/Company:	Buffalo Department of Fire Prevention
Phone:	716-851-5707
Interviewer:	Kevin Janik
Information:	The City of Buffalo Department of Fire Prevention has no records of storage tanks at the property(s) of 286, 288, and/or 300 East Amherst Street in Buffalo, NY.

TELEPHONE INTERVIEW/INFORMATION

Date:	October 23, 1996
Time:	11:00 AM
Name:	Captain James Ronan
Position/Company:	Buffalo Fire Department
Phone:	716-836-9570
Interviewer:	Kevin Janik
Information:	Captain Ronan has no information related to recognized environmental conditions in connection to 300 East Amherst St.

INTERVIEW FORM FOR OWNER/OCCUPANT

Description of Site: Address:

300 E. Amherst
Buffalo, NY

Questions answered by:
Name: Ted SKarbowski
Title: Owner
Address: 1675 S. Fisk Blvd, #150
Rockledge, Fl ~~32955~~

Phone: 407-633-9442
Signature:
Date: 10/24/96
If via phone, interviewer's signature:

Please answer the following questions honestly and to the best of your knowledge. If you know of another individual who is accessible and may have better knowledge of these issues, please refer us to them.

1. Currently or in the past has the property or any adjoining property been used for any of the following?

	Property	Adjoining
industrial use	(Y)/N	(Y)/N
gasoline station	Y/(N)	Y/(N)
motor repair facility	Y/(N)	Y/(N)
commercial printing facility	Y/(N)	Y/(N)
dry cleaners	Y/(N)	Y/(N)
photo developing laboratory	Y/(N)	Y/(N)
junkyard or scrapyard	Y/(N)	Y/(N)
landfill	~~(Y)~~/(N)	(Y)/N
waste treatment, storage, disposal, processing or recycling facility	Y/(N)	Y/(N)

If yes, to any of the above, please identify:

Scafolding Business on site
Harrison Radiator accross street
Park behind property was a landfill

2. Are there currently, or have there been previously any of the following been stored on site?

hazardous substances or petroleum products Y/(N)

damaged or discarded automotive or industrial batteries Y/(N)

55 gallon drums Paint (Y)/N

pesticides, (paints) or other chemicals in sacks or containers greater than 5 gallons or in total volume greater than 50 gallons at a time? (Y)/N

If yes, to any of the above, please identify:

3. Has the site ever been backfilled? (Y)/N

If yes, what was the nature and source of the fill material?

Gravel/Cover Rock in yard from Quary
Prior to Ownership

4. Are the currently, or have there been previously, any pits, ponds, or lagoons located on the property? Y/(N)

If yes, what was their purpose?

5. Is there currently, or has there been previously, any stained soil on the property? Y/(N)

If yes, please explain:

6. Are there currently, or have there been previously, any registered or unregistered storage tanks (above or underground) located on the property? (Y)/N

If yes, explain:

Portable 250 gal Diesel AST for Short Time
On concrete Pad
Near Fence on N side center

7. Are there currently, or have there been previously, any vent pipes, fill pipes, pipe of unknown purpose protruding from the ground on the property or adjacent to any structure located on the property? Y/N

If yes, explain

8. Are there currently, or have there been previously, any flooring, drains, or walls located within the facility that are stained by substances other than water or are emitting foul odors? Y/N

If yes, explain:

9. Is the property served by a private well or non-public water system? Y/N

If yes, have contaminants been identified in the well or system that exceed guidelines applicable to the water system or has the well been designated as contaminated by any government environmental/health agency? Y/N

If yes, explain:

10. Does the property discharge waste water on or adjacent to the property other than storm water or into a sanitary sewer system? Y/N

If yes, explain:

11. Have any hazardous substances, petroleum products, or waste materials of any type been dumped above grade, buried and/or burned on the property? Y/N

If yes, explain:

12. Are there or have there been in the past any transformers, capacitors, or hydraulic equipment on site? Y/N

If yes, are they marked or do you have records of testing as to PCB content?

13. Do you have any knowledge of environmental liens or governmental notification relating to past or recurrent violations of environmental laws with respect to the property or any facility located on the property? Y(N)

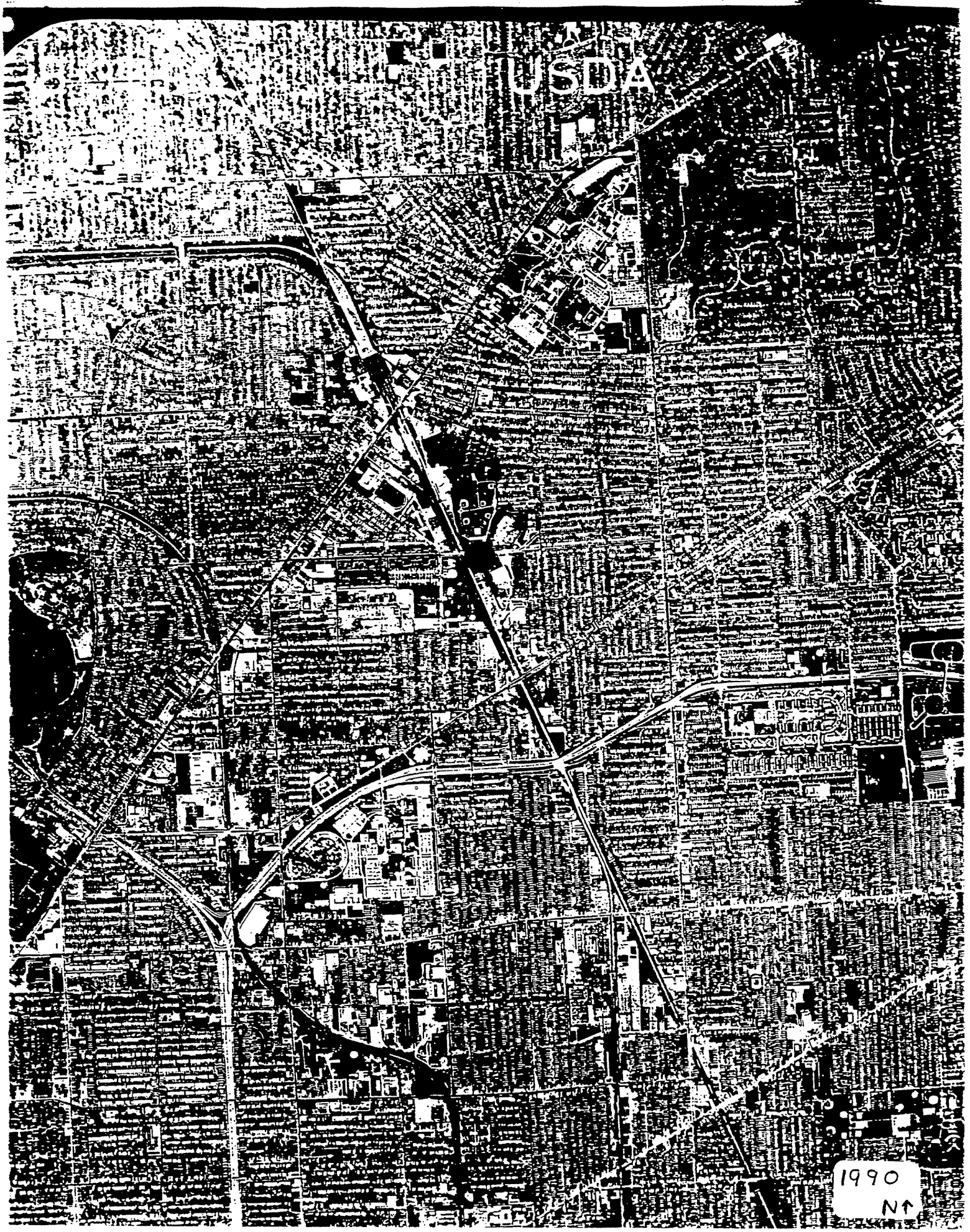
If yes, explain:

14. Do you have any knowledge of any environmental site assessment of the property or facility that indicated the presence of hazardous substances or petroleum products, or contamination of, the property or recommended further assessment of the property? Y(N)

If yes, explain:

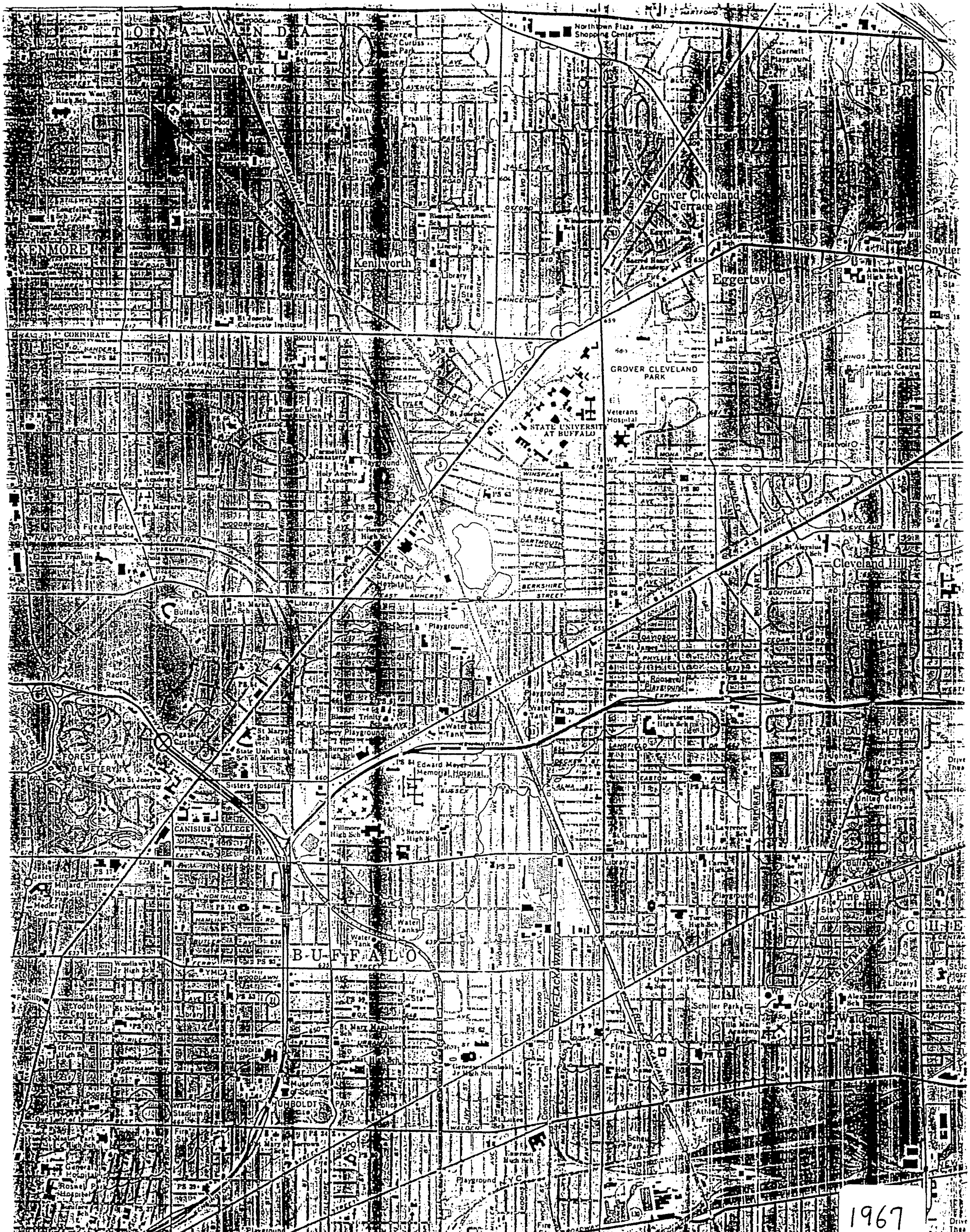
15. Do you know of any past, threatened, or pending lawsuits or administrative proceedings concerning a release or threatened release of any hazardous substance or petroleum products involving the property by any owner or occupant of the property? Y(N)

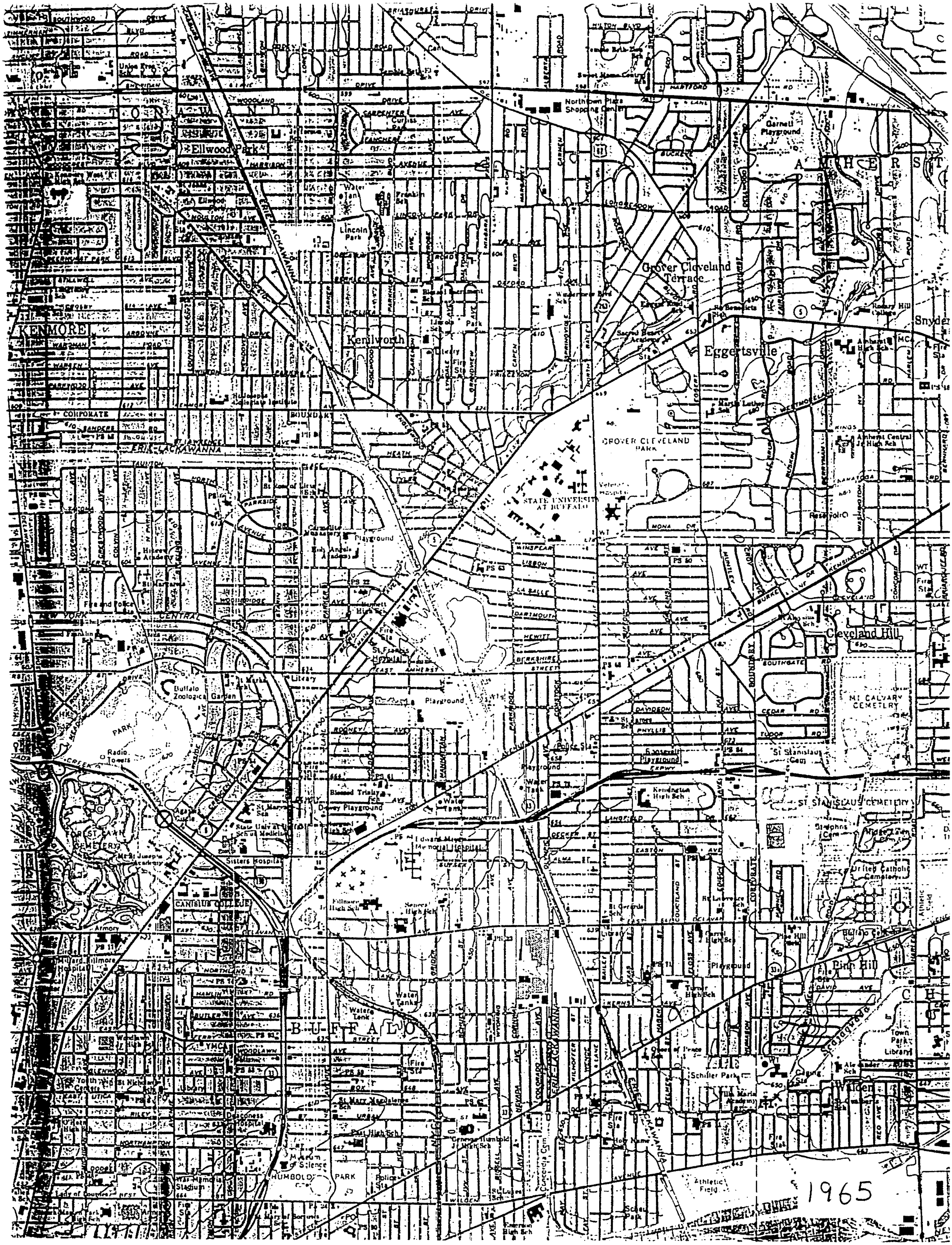
If yes, explain:

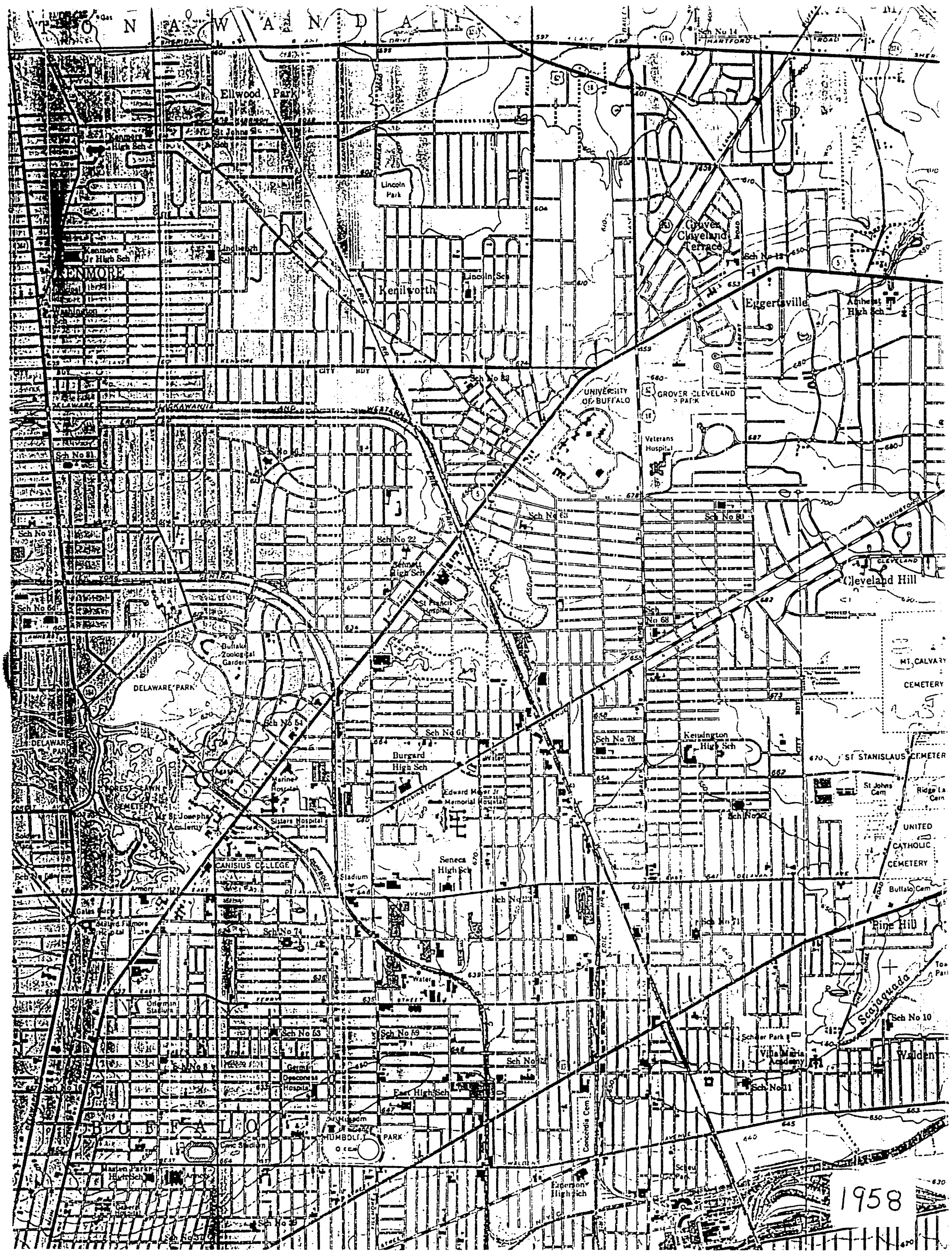

USDA
1990
N↑


1960
N↑

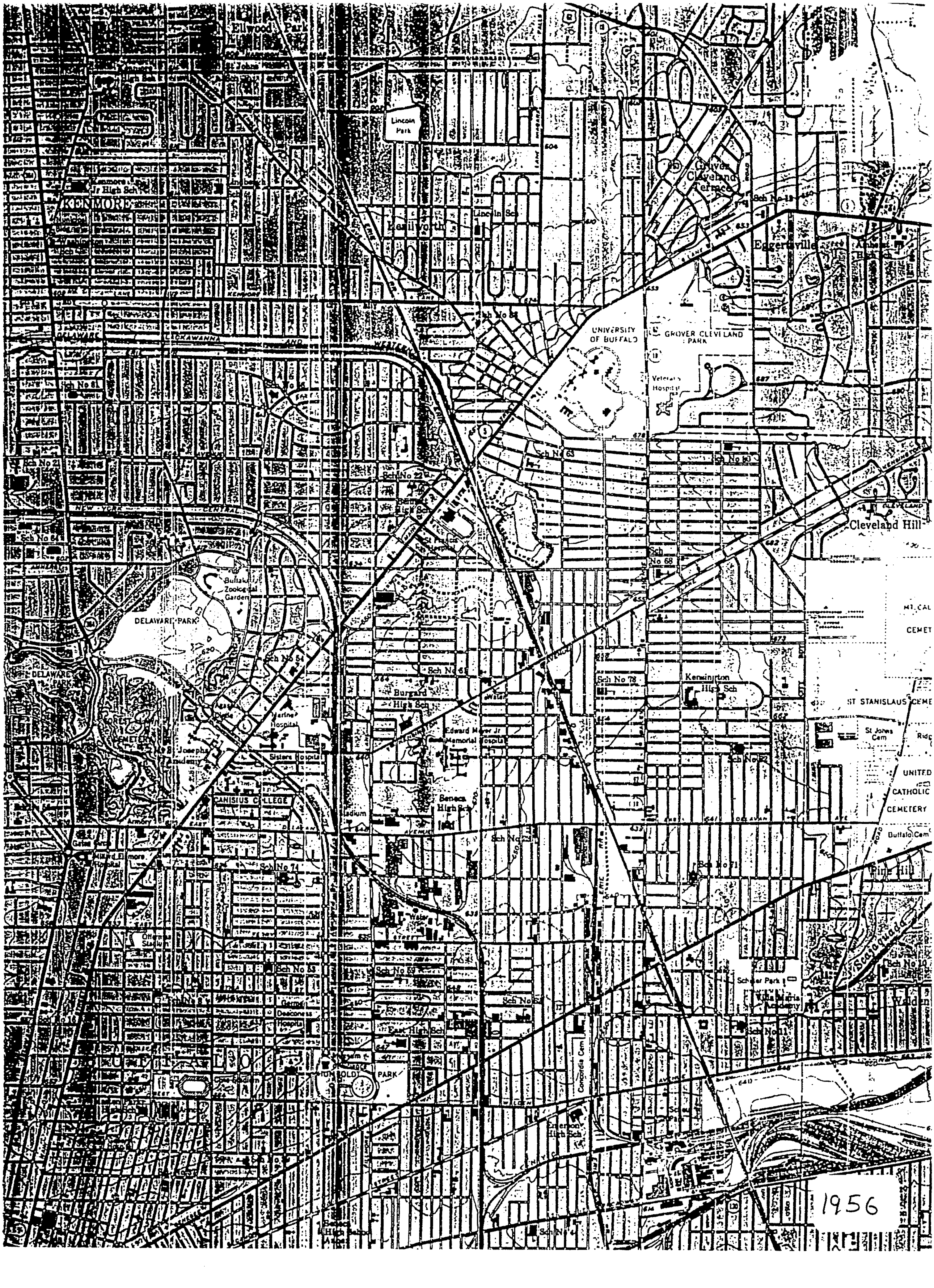
1951 - 300 F Aerial


TONAWANDA
Northtown Plaza Shopping Center
Ellwood Park
Kenmore West High Sch
KENMORE
Kenilworth
AMHERST
Grover Cleveland Terrace
Eggertsville
Snyder
St Joseph Collegiate Institute
ERIE-LACKAWANNA
GROVER CLEVELAND PARK
STATE UNIVERSITY AT BUFFALO
Veterans Hospital
Reservoir
Hebrew Academy
Holy Angels Academy
NEW YORK CENTRAL
Bennett High Sch
St Francis Hospital
Cleveland Hill
Buffalo Zoological Garden
Radio Towers
Police Sta
Roosevelt Playground
Kensington High Sch
ST STANISLAUS CEMETERY
FOREST LAWN CEMETERY
Mt St Joseph Academy
State Univ at Buffalo Sch of Medicine
Sisters Hospital
Edward Meyer Memorial Hospital
CANISIUS COLLEGE
Fillmore High Sch
Seneca High Sch
United Catholic Cemetery
Millard Fillmore Hospital
Pine Hill
BUFFALO
Woodlawn High Sch
Schiller Park
Villa Maria Academy
Deaconess Hospital
Museum of Science
HUMBOLDT PARK
Concordia Cem
General Hospital
Roswell Park Hospital
Playground
1967


KENMORE
Ellwood Park
Kenilworth
Grover Cleveland Terrace
Eggertsville
AMHERST
Snyder
GROVER CLEVELAND PARK
STATE UNIVERSITY AT BUFFALO
Cleveland Hill
MT CALVARY CEMETERY
ST STANISLAUS CEMETERY
Buffalo Zoological Garden
PARK
CANISIUS COLLEGE
BUFFALO
HUMBOLDT PARK
Northtown Plaza Shopping Center
Lincoln Park
Pine Hill
Schiller Park
Edward Meyer Memorial Hospital
Sisters Hospital
Millard Fillmore Hospital
Museum of Science
Athletic Field
ERIE LACKAWANNA
NEW YORK CENTRAL
1965



TONAWANDA
Ellwood Park
Kenmore High Sch
Lincoln Park
Kenmore Jr High Sch
KENMORE
Kenilworth
Lincoln Sch
Grover Cleveland Terrace
Eggertsville
Amherst High Sch
UNIVERSITY OF BUFFALO
GROVER CLEVELAND PARK
Veterans Hospital
Sch No 81
Sch No 80
Sch No 22
Bennett High Sch
St Francis Hospital
Cleveland Hill
Sch No 68
MT. CALVARY CEMETERY
Buffalo Zoological Garden
DELAWARE PARK
Sch No 54
Sch No 61
Burgard High Sch
Sch No 78
Kensington High Sch
ST STANISLAUS CEMETERY
FOREST LAWN CEMETERY
St Josephs Academy
Marine Hospital
Sisters Hospital
Edward Meyer Jr Memorial Hospital
St Johns Cem
UNITED CATHOLIC CEMETERY
CANISIUS COLLEGE
Seneca High Sch
Stadium
Armory
Buffalo Cem
Pine Hill
Sch No 74
Scajaquada
Sch No 10
Sch No 63
Sch No 69
Schiller Park
Villa Maria Academy
Walden
Deaconess Hospital
East High Sch
Sch No 11
Concordia Cem
BUFFALO
HUMBOLDT PARK
Civic Stadium
Emerson High Sch
1958



Ellwood Park
Lincoln Park
Kenmore Jr High Sch
KENMORE
Lincoln Sch
Kenilworth
Grover Cleveland Terrace
Eggertsville
UNIVERSITY OF BUFFALO
GROVER CLEVELAND PARK
Veterans Hospital
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NEW YORK CENTRAL
Sch No 68
Cleveland Hill
Buffalo Zoological Garden
DELAWARE PARK
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Burgard High Sch
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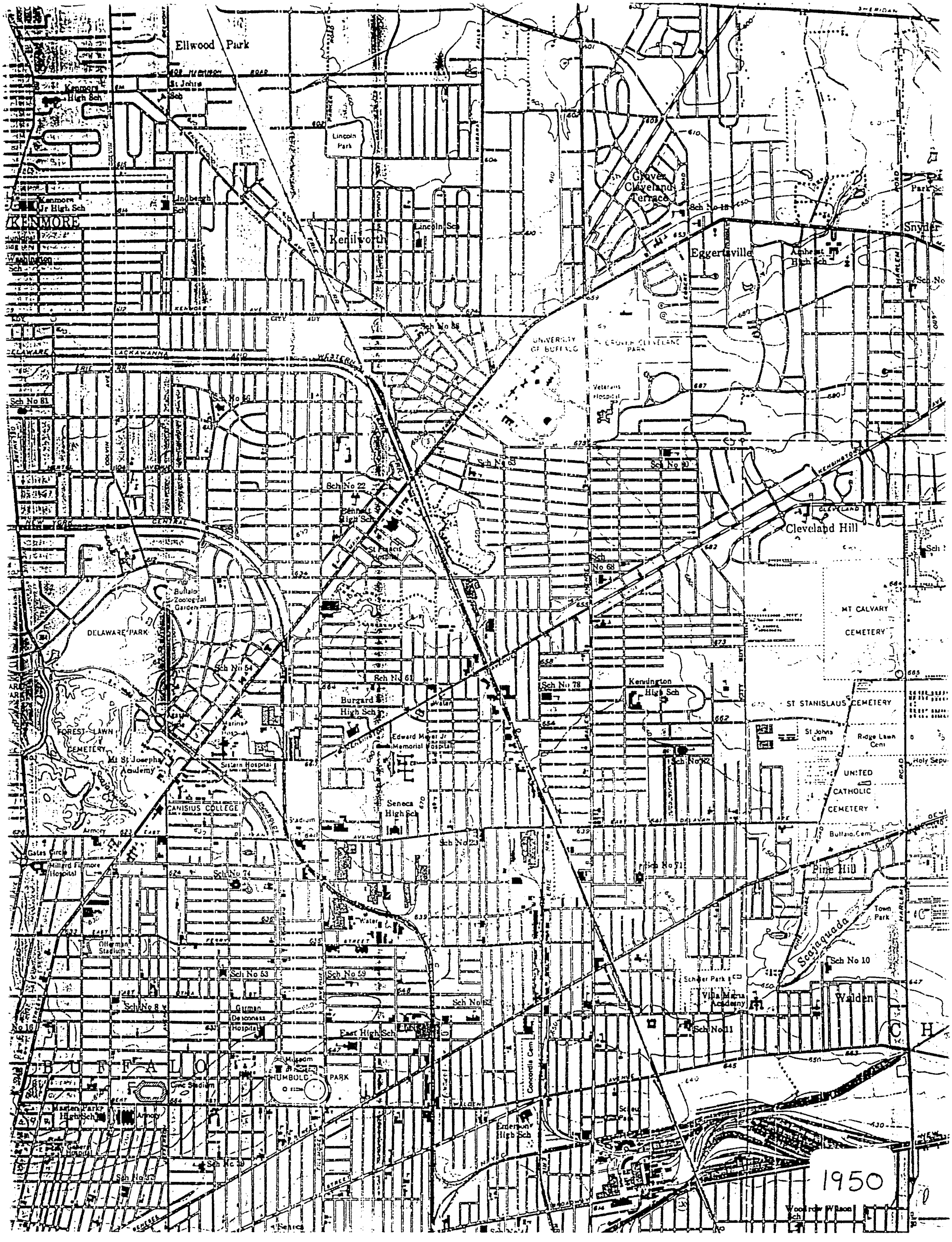
St Johns Cem
Edward Meyer Jr Memorial Hospital
Sisters Hospital
UNITED CATHOLIC CEMETERY
CANISIUS COLLEGE
Seneca High Sch
Buffalo Cem
Millard Fillmore Hospital
Sch No 74
Sch No 71
Pine Hill
Sch No 53
Sch No 69
Schiller Park
Villa Maria Academy
Deaconess Hospital
East High Sch
HUMBOLDT PARK
Concordia Cem
1956



Ellwood Park
Kenmore High Sch
Lincoln Park
Kenmore Jr High Sch
KENMORE
Kenilworth
Lincoln Sch
Grover Cleveland Terrace
Sch No 18
Snyder
Eggertsville
Amherst High Sch
UNIVERSITY OF BUFFALO
GROVER CLEVELAND PARK
Veterans Hospital
Sch No 86
Sch No 81
Sch No 66
Sch No 63
Sch No 90
Sch No 22
Bennett High Sch
St Francis Hospital
Cleveland Hill
Sch No 68
Buffalo Zoological Garden
DELAWARE PARK
MT CALVARY CEMETERY
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Sch No 61
Sch No 78
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ST STANISLAUS CEMETERY
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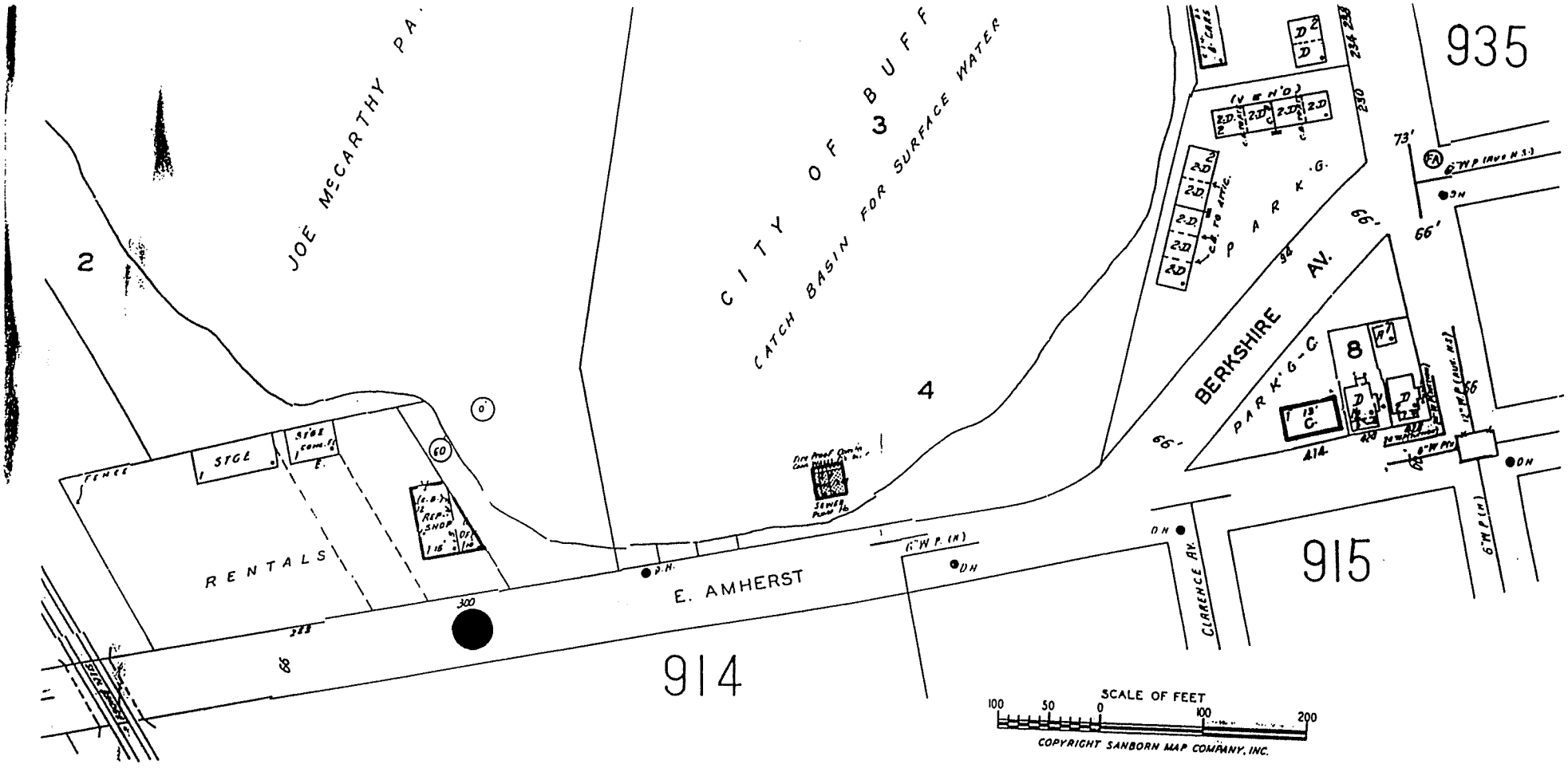
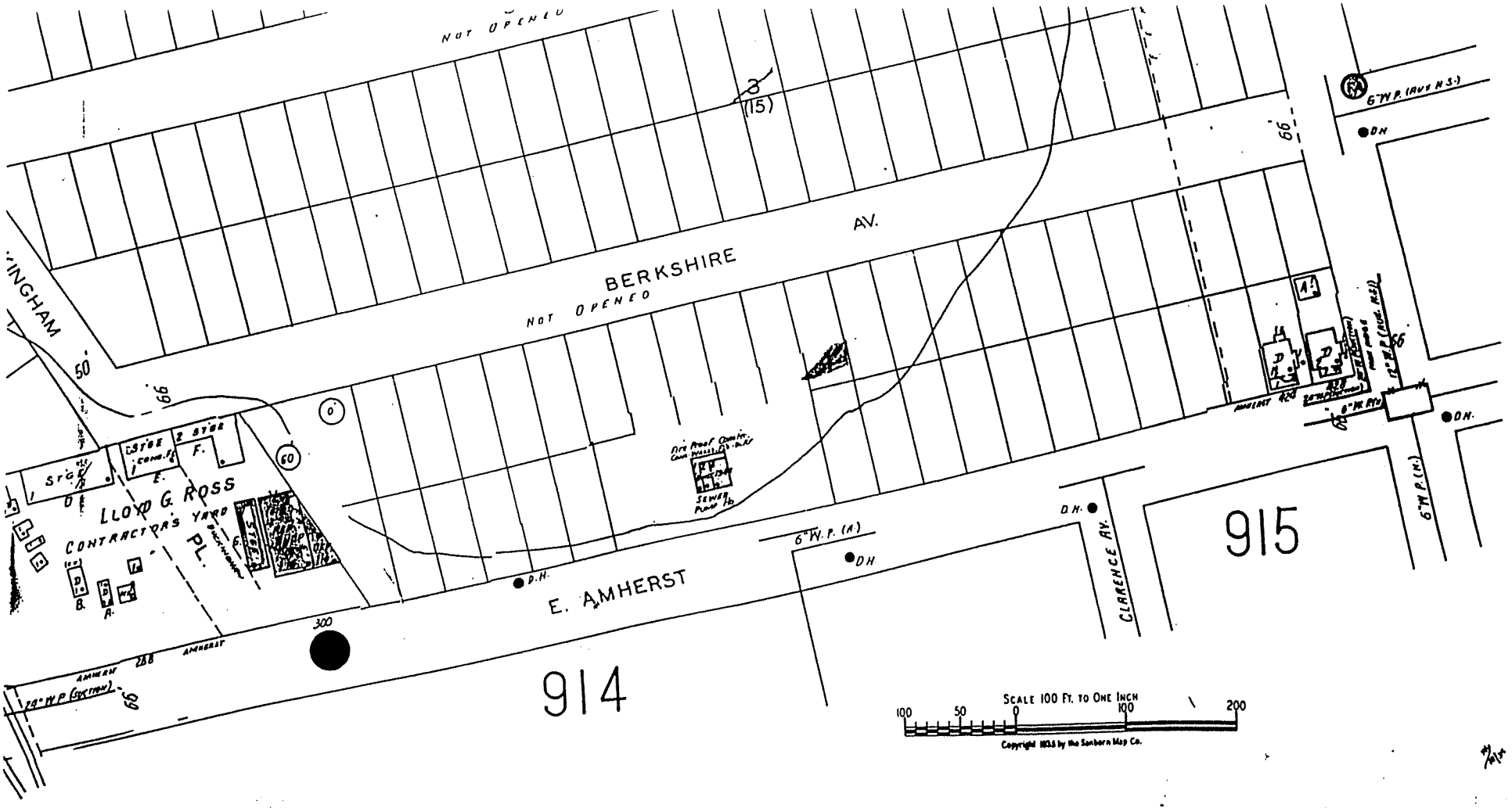
Edward Meyer Jr Memorial Hospital
St Johns Cem
Ridge Lawn Cem
Mt St Joseph's Academy
Sisters Hospital
UNITED CATHOLIC CEMETERY
CANISIUS COLLEGE
Seneca High Sch
Stadium
Armory
Gates Circle
Millard Fillmore Hospital
Sch No 23
Buffalo Cem
Sch No 74
Pine Hill
Offermann Stadium
Town Park
Scajaquada
Sch No 10
Sch No 53
Sch No 59
Walden
Sch No 8
German Deaconess Hospital
Villa Maria Academy
Sch No 11
East High Sch
BUFFALO
Museum
HUMBOLDT PARK
Civic Stadium
Concordia Cem
Masten Park High Sch
Armory
Emerson High Sch
Woodrow Wilson Sch
1950



1986



Environmental Risk Information & Imaging Services

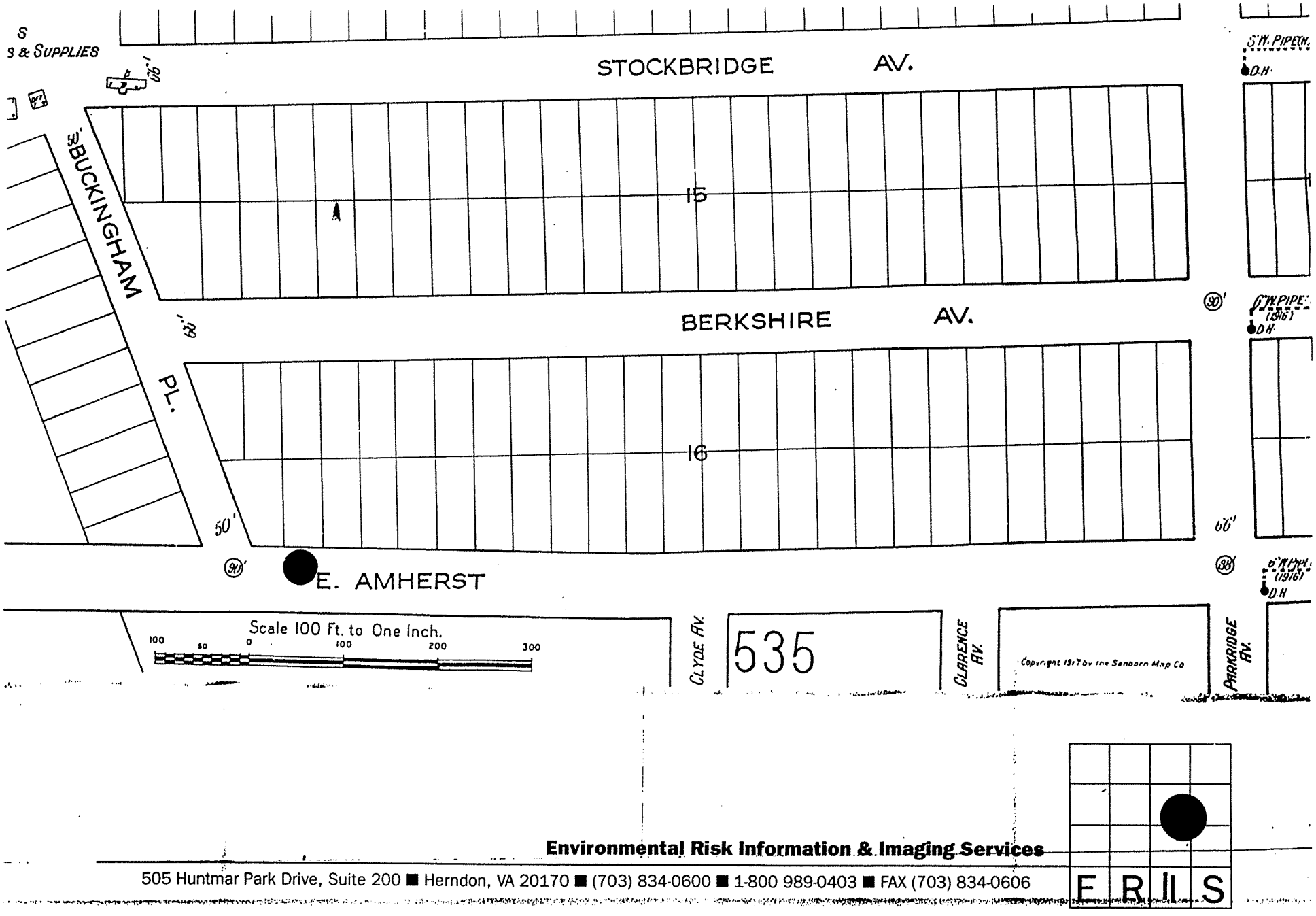
505 Huntmar Park Drive, Suite 200 ■ Herndon, VA 20170 ■ (703) 834-0600 ■ 1-800 989-0403 ■ FAX (703) 834-0606

SANBORN

1950

SANBORN

1935



Laboratory Report

Client:	**Sterling Environmental Svcs., Inc.** 1372 Clinton Street Buffalo, NY 14206	Laboratory Project #	NY610096
		Project Manager:	Paul Chopra
		Start Date:	10/7/96
Attention:	Kevin Janik	Report Date:	10/8/96
Project Ref #	-	Analysis Type:	**Bulk Asbestos Analysis by Polarized Light Microscopy**
Purchase Order #	-		
Project:	**Bulk Sample Anlaysis** **300 E. Amherst**	Authorized Signature	Paul S. Chopra, Laboratory Manager

Analysis Results Table

Client Sample	CLI Sample #	Sample Location / Description *Material Description(s)*	*Asbestos Content*	Analyst Comment *Non-Asbestos Content*	Analyst - Date
The following 2 samples were submitted by Sterling Environmental Svcs., Inc. on 10/7/96 and analyzed in accordance with PLM - ELAP Method 198.1					
S1	196210	Storage room Ceiling tile			PF 10/8/96
		100% Brown ceiling tile	*No Asbestos Detected using PLM*	*92% Cellulose 8% Non-Fibrous Material*	
No asbestos detected in sample					
S2	196211	Warehouse Wallboard			PF 10/8/96
		100% White wallboard	*No Asbestos Detected using PLM*	*23% Cellulose 19% Fiberglass 58% Non-Fibrous Material*	
No asbestos detected in sample					

Additional testing is recommended for any material which contains <1% asbestos or NOB (non-friable organically bound) bulk materials which are negative or <1% asbestos. Analysis by Polarized Light Microscopy (PLM) has a degree of uncertainty that is dependent on the sample matrix, non-asbestos minerals present, size of the asbestos present, the sample homogeneity and analyst variability. PLM coefficients of variance range from approx. 1.8, at the quantitation limit of 1%, to 0.1 at high fiber concentrartions. All PLM analyses must be reviewed with these factors taken into

CHOPRA-LEE incorporated
1815 Love Road
Grand Island, NY 14072
716-773-7625 FAX 716-773-7624

NIST NVLAP Lab # 1208-01

NYS DOH ELAP Lab # 10954

ACTS TESTING LABS, INC.
3916 Broadway
Buffalo, NY 14227-1104
Tel (716) 684-3300
Fax (716) 684-3303

Technical Report #6B-08841E
Project Name: 300 E. Amherst

October 21, 1996

ELAP ID# 10247

Mr. Wayne Cameron
STERLING ENVIRONMENTAL
1372 Clinton Street
Buffalo, NY 14206

SUBJECT:

Analyses of two (2) soil sample received on October 7, 1996.

RESULTS:

See Pages Two through Six.

EXPERIMENTAL:

"Test Methods for Evaluating Solid Waste: Physical/Chemical Methods," SW-846, 3rd Edition, September 1994.

ACTS TESTING LABS, INC.
Charles E. Hartke
Manager, Chemistry Laboratory

ACTS TESTING LABS, INC.
Elizabeth R. Hausler, Supervisor
Gas Chromatography Laboratory

ACTS TESTING LABS, INC.
Lisa M. Clerici, Supervisor
Wet Chemistry Laboratory

cme

RESULTS:

TAL METALS	ACTS #6B-08841E 96-107A	ACTS #6B-08842E 96-107B
Aluminum, Total	10400	5670
Antimony, Total	5.70	< 5.50
Arsenic, Total	8.60	23.3
Barium, Total	62.3	174
Beryllium, Total	< 0.559	< 0.550
Cadmium, Total	< 0.559	1.10
Calcium, Total	9580	58300
Chromium, Total	11.3	47.9
Cobalt, Total	9.83	19.6
Copper, Total	9.83	134
Iron, Total	13100	64200
Lead, Total	26.8	271
Magnesium, Total	6630	15700
Manganese, Total	867	637
Mercury, Total	0.747 (0.564)* (0.58)**	0.533 (0.418)* (0.496)**
Nickel, Total	16.3	47.0
Potassium, Total	877	970
Selenium, Total	< 13.4	< 13.2
Silver, Total	< 0.559	< 0.550
Sodium, Total	234	295
Thallium, Total	< 5.59	< 5.50
Vanadium, Total	39.2	103
Zinc, Total	336	564
Cyanide	< 0.070	< 0.068

Results are reported as micrograms per gram (ug/g).
*=Duplicate results
**=Triplicate results

TCL PCBs Polychlorinated Biphenyls as:		
Arochlor 1016	< 9.2	< 8.9
Arochlor 1221	< 9.2	< 8.9
Arochlor 1232	< 9.2	< 8.9
Arochlor 1242	< 9.2	< 8.9
Arochlor 1248	< 9.2	< 8.9
Arochlor 1254	< 9.2	< 8.9
Arochlor 1260	< 9.2	< 8.9

Results are reported as micrograms per kilogram (ug/Kg)

RESULTS:

TAL PESTICIDES	ACTS #6B-08841E 96-107A	ACTS #6B-08842E 96-107B
alpha-BHC	< 1.8	< 1.8
gamma-BHC	< 1.8	< 1.8
beta-BHC	< 1.8	< 1.8
Heptachlor	< 1.8	< 1.8
delta-BHC	< 1.8	< 1.8
Aldrin	< 1.8	< 1.8
Heptachlor epoxide	< 1.8	< 1.8
Endosulfan I	< 1.8	< 1.8
4,4'-DDE	< 1.8	< 1.8
Dieldrin	< 1.8	< 1.8
Endrin	< 1.8	< 1.8
4,4'-DDD	< 1.8	< 1.8
Endosulfan II	< 1.8	< 1.8
4,4'-DDT	< 5.0	< 1.8
Endrin aldehyde	< 1.8	< 1.8
Endodulfan sulfate	< 1.8	< 1.8
Methoxychlor	< 7.4	< 7.1
Chlordane	< 9.2	< 8.9
Toxaphene	< 9.2	< 8.9

Results are reported as micrograms per kilogram (ug/Kg).

TAL VOLATILES		
Dichlorodifluoromethane	< 1.4	< 1.4
Chloromethane	< 1.4	< 1.4
Vinyl Chloride	< 1.4	< 1.4
Bromomethane	< 1.4	< 1.4
Chloroethane	< 1.4	< 1.4
1,1-Dichloroethene	< 0.7	< 0.7
Acetone	240	550
Carbon Disulfide	4.0	2.0
Methylene Chloride	350	260
trans-1,2-Dichloroethene	< 0.7	< 0.7
1,1-Dichloroethane	< 0.7	< 0.7
Chloroform	10.0	7.0
1,2-Dichloroethane	< 0.7	< 0.7
2-Butanone	< 1.4	< 1.4
1,1,1-Trichloroethane	< 0.7	< 0.7
Carbon Tetrachloride	< 0.7	< 0.7

Results are reported as micrograms per kilogram (ug/Kg).

TAL VOLATILES (con't)	ACTS #6B-08841E 96-107A	ACTS #6B-08842E 96-107B
Benzene	< 0.7	< 0.7
Trichloroethene	2.0	< 0.7
1,2-Dichloropropane	< 0.7	< 0.7
Bromodichloromethane	< 0.7	< 0.7
cis-1,3-Dichloropropene	< 0.7	< 0.7
4-Methyl-2-pentanone	< 0.7	33.0
2-Hexanone	< 7.0	< 7.0
Toluene	10.0	93.0
trans-1,3-Dichloropropene	< 0.7	< 0.7
1,1,2-Trichloroethane	< 0.7	< 0.7
Tetrachloroethene	< 0.7	< 0.7
Dibromochloromethane	< 0.7	< 0.7
1,2-Dibromoethane	< 0.7	< 0.7
Chlorobenzene	< 0.7	< 0.7
Ethylbenzene	4.0	7.0
M,P-Xylenes	7.0	23.0
O-Xylene	2.0	4.0
Styrene	< 0.7	< 0.7
Bromoform	< 0.7	< 0.7
1,1,2,2-Tetrachloroethane	< 0.7	< 0.7
1,2-Dibromo-3-chloropropane	< 0.7	< 0.7
Bromochloromethane	< 0.7	< 0.7
cis-1,2-Dichloroethene	< 0.7	< 0.7

Results are reported as micrograms per kilogram (ug/Kg).

TAL SEMI VOLATILES		
N-Nitroso-dimethylamine	< 760	< 680
Phenol	< 380	< 340
Bis (2-chloroethyl) ether	< 380	< 340
2-Chlorophenol	< 380	< 340
1,3-Dichlorobenzene	< 380	< 340
1,4-Dichlorobenzene	< 380	< 340
1,2-Dichlorobenzene	< 380	< 340
Bis (2-chloroisopropyl) ether	< 380	< 340
2-Methylphenol	< 380	< 340
N-Nitroso-di-n-propylamine	< 380	< 340
Hexachloroethane	< 380	< 340
4-Methylphenol	< 380	< 340
Nitrobenzene	< 380	< 340

Results are reported as micrograms per kilogram (ug/Kg).

TAL SEMI VOLATILES (con't)	ACTS #6B-08841E 96-107A	ACTS #6B-08842E 96-107B
Isophorone	< 380	< 340
2-Nitrophenol	< 380	< 340
2,4-Dimethylphenol	< 380	< 340
Bis (2-chloroethoxy) methane	< 380	< 340
2,4-Dichlorophenol	< 380	< 340
1,2,4-Trichlorobenzene	< 380	< 340
Naphthalene	< 380	< 340
4-Chloroaniline	< 380	< 340
Hexachlorobutadiene	< 760	< 680
4-Chloro-3-methylphenol	< 380	< 340
2-Methylnaphthalene	< 3800	< 3400
Hexachlorocyclopentadiene	< 3800	< 3400
2,4,6-Trichlorophenol	< 1900	< 1700
2,4,5-Trichlorophenol	< 1900	< 1700
2-Chloronaphthalene	< 380	< 340
2-Nitroaniline	< 380	< 340
Dimethylphthalate	< 380	< 340
Acenaphthylene	< 380	< 340
2,6-Dinitrotoluene	< 380	< 340
Acenaphthene	< 380	< 340
3-Nitroaniline	< 760	< 680
2,4-Dinitrophenol	< 380	< 340
Dibenzofuran	< 380	< 340
2,4-Dinitrotoluene	< 380	< 340
4-Nitrophenol	< 3800	< 3400
Diethylphthalate	< 380	< 340
Fluorene	< 380	< 340
4-Nitroaniline	< 760	< 680
4-Chlorophenyl phenyl ether	< 760	< 680
4,6-Dinitro-2-methylphenol	< 760	< 680
N-Nitrosodiphenylamine	< 380	< 340
4-Bromophenyl phenyl ether	< 380	< 340
Hexachlorobenzene	< 380	< 340
Pentachlorophenol	< 380	< 340
Phenanthrene	< 380	620
Anthracene	< 380	< 340
Carbazole	< 380	< 340
Di-n-butyl phthlate	< 380	< 340
Fluoranthene	< 380	1100
Pyrene	< 380	1200
Butyl benzyl phthalate	< 380	< 340

Results are reported as micrograms per kilogram (ug/Kg).

TAL SEMI VOLATILES (con't)	ACTS #6B-08841E 96-107A	ACTS #6B-08842E 96-107B
Benzo(a)anthracene	< 380	570
3-3'-Dichlorobenzidine	< 760	< 680
Chrysene	< 380	570
Bis (2-ethylhexyl) phthlate	< 380	< 340
Di-n-octyl phthlate	< 380	< 340
Benzo(b)fluoranthene	< 380	620
Benzo(k)fluoranthene	< 380	510
Benzo(a)pyrene	< 380	660
Indeno(1,2,3-cd) pyrene	< 380	< 340
Dibenzo(a,h)anthracene	< 380	< 340
Benzo(g,h,i)perylene	640	560

Results are reported as micrograms per kilogram (ug/kg).

judgments or decrees recovered or docketed against them or either of them and now unpaid or unsatisfied of record in the Circuit or District Courts of the United States for the Northern or Southern Districts of New York or in any other Court of Record in said State: and that there are no unpaid taxes or assessments against said premises: that the Ruhama Smith mentioned in above search was the mother of deponent, T. J. Smith, and is now deceased: that her only children and heirs-at-law surviving were. Luman Smith, Thomas J., Elizabeth Lockwood, Juliet Bellinger, Emeline Berlin and Polly Scott: that said Polly is now deceased, and left her surviving her only heirs, Wm.. and Harriet Scott, Juliette Cutler and Mary Leach.

	Polly Smith, wife of Thomas J.Smith and the said Thomas J. Smith	W Deed dated September 1,1870 recorded in liber 250 of Deeds page 585 September 22 1870
34	to	Conveys part of lot 45, township 11, range 8, described as follows: Beginning in the south
	The Suspension Bridge and Erie Junction Railroad Company	line of said lot № 45 at the intersection of the said south line with the center line of the
	No search as grantee	Rail Road of said party of the
	This deed is set out for reference only	second part, as the said center line is located and a map thereof filed in the office of the Clerk of the County of Erie, and said point being also at the distance of 23.62 feet northerly from the

47	*In re Buffalo Cement Company, Limited*	*Certified Copy of Certificate of Incorporation, dated March 2 1877. Filed in Erie County Clerk's Office March 5 1877*
		For the purpose of carrying on and conducting the manufacture and sale of Hydraulic Cement at the City of Buffalo: that ***the term of existence of said corporation shall be 25 years.***
48	*In re Buffalo Cement Company, Limited*	***Certificate of Extension*** *of the corporate existence dated January 25 1902, recorded in liber 14 of Certificates of Incorporation page 91 January 27 1902. Extends the term of existence of said corporation, which expires on or about February 10 1902, for the term of 50 years beyond the time specified in its original Certificate of Incorporation*
49	*In re Buffalo Cement Company, Limited*	*Agreed Certificate, amending the original Certificate of Incorporation, dated February 20 1902, recorded in liber 14 of Certificates of Incorporation page 183 February 27 1902 For the purpose of carrying on*

October 17 1904

89	*Buffalo Crushed Stone Company* *to* *Clinton M. Ross* *No search vs grantee*	*W Deed dated December 21 1923 recorded in liber 1640 of Deeds page 518 December 31 1923 Conveys premises*

D.
Dec-31-23
Louis
⑩

Fee making search cover add #22 = search for title of Buffalo Crushed Stone Co.

90	Clinton M. Ross to Lloyd G. Ross	W Deed dated November 16 1942 recorded in liber 3327 of Deeds page 44 November 20 1942 Conveys part of Lot № 45, Township 11, Range 8, described as follows:- Beginning at a point on the northerly side of East Amherst Street at a distance of 251.09 feet easterly from the intersection of the northerly line of East Amherst Street with the easterly right of way line of the D. L. & W. R. R.: thence westerly 76.30 feet: thence northerly at right angles to East Amherst Street 188.62 feet: thence southerly parallel with the D. L. & W. R. R. right of way 203.47 feet to the point of beginning.
91	Will of Clinton M. Ross (Case № 142530)	Will dated May 3 1929 recorded in Erie County Surrogate's Office in liber 136 of Wills page 519 December 1 1943 Directs payment of all just debts and funeral expenses.

personal and real property owned by him (except the farm at Caroline, New York, which he gives to his son Lloyd G. Ross). It is his wish that Lillian Ross Churchill be kept from want by use of any money from his estate not needed by his wife.
Petition for Probate filed December 1 1943 recites death of decedent on or about November 11 1943 leaving him surviving his widow Kathryn W. Ross, (also known as Catherine W. Ross), his daughter Lillian Ross Churchill and his son Lloyd G. Ross, all of full age, only distributees of decedent.
Letters of Administration with the will annexed granted to Kathryn W. Ross, (also known as Catherine W. Ross) December 1 1943 recorded in liber 94 of Letters page 410.
State Transfer Tax return lists premises.
Reports estate non-taxable.

	Kathryn W. Ross	W Deed dated July 12 1944
92	to	recorded in liber 3567 of
	Lloyd G. Ross	Deeds page 279 July 13 1944
		Conveys premises, except part
		conveyed by above deed Nº 90
	Lloyd G. Ross	W Deed dated March 18 1947
93	to	recorded in liber 4082 of
	The City of Buffalo	Deeds page 172 March 21 1947
	NO SEARCH VS GRANTEE	Conveys part of Lot Nº 45, Town-
		ship 11, Range 8, described as
		follows:- Beginning at the point

of intersection of the northerly line of East Amherst Street and the westerly line of premises now or formerly owned by the Buffalo Crushed Stone Corporation: thence westerly 89° 43' west 251.09 feet measured along the said northerly line of East Amherst Street to a point in the Delaware, Lackawanna & Western Railroad Company's right of way: thence northerly 21° 2' 10" west 19.42 feet measured along the said easterly right of way line of the Delaware, Lackawanna & Western Railroad Company to a point: thence easterly 87° 29' 57" east 253.89 feet to a point in the said westerly line of premises now or formerly owned by the Buffalo Crushed Stone Corporation: thence southerly 21° 2' 10" east 12.189 feet measured along said last above mentioned line to the place of beginning.

Cf.
Sept-25-52
Gutschow

- -

94	Lloyd G. Ross To Theodore J. Skarbowski Co. Inc. (No search against this lessee)	Lease Dated March -- 1968 Acknowledged March 26 1968 Recorded June 4 1968 in Liber 7474 of Deeds at page 452 Leases premises for a period of 5 years from April 1 1968 with right to extend same for an additional 5 years. Also second party shall have first option to purchase premises. (See terms etc.)

95	Will Of Lloyd G. Ross 69-742	Will Dated October 31 1968 Probated March 10 1969

Directs that his just debts and funeral expenses be paid. Devises to Anne Ludlow, niece of his deceased wife, Cecil B. Ross, all of his property both real and personal, absolutely and forever.

Appoints Anne Ludlow, executrix with full power to mortgage, sell etc.

Petition for Probate of Will filed February 7 1969, recites that he died February 3 1969 leaving him surviving various nieces and nephews.

Petition also lists as devisees, legatees and beneficiaries Anne Ludlow, no relation of full age.

Letters Testamentary issued to Anne Ludlow recorded March 10 1969.

No Transfer Tax Proceedings filed as of April 21 1969.

CLOSING INCLUDED
10/25/69

I & DL — Dated April 21 1969 — at '8:59' AM

Lou.

MONROE ABSTRACT & TITLE CORPORATION
By [signature]
Assistant Vice President

FROM APRIL 21 1969 AT '8:59' AM TO DATE

	United States of America To Estate of Lloyd G. Carr	Certificate Release Estate Tax Lien Dated April 9 1969 Recorded May 23 1969 in Liber of Transfer Tax and Releases at page Releases premises from lien of United States imposed by Section 6324 of the Internal Revenue Code.
96		
	People of the State of To Same	Release Lien of Estate Tax Dated April 18 1969 Recorded May 23 1969 in Liber of Transfer Tax at page Releases premises from the lien of estate tax imposed by Article 10-C or Article 26 of the Tax Law, pursuant to the provisions of Section 249-bb of the Tax Law.
97		

- -

Anne Ludlow, as	Executor's Deed
executor of the Last	Dated May 16 1969
Will and Testament	Acknowledged May 16 1969
of Lloyd G. Ross, deceased	Recorded May 27 1969 in
98 To	Liber of Deeds at page
Theodore J. Skarbowski	Consideration $13,500.00
Co. Inc.	Conveys premises
([illegible] against this grantee except for [illegible] for the [illegible] [illegible] tax liens from December 23 1935)	

- -

Theodore J. Skarbowski	Mortgage
Co. Inc.	Dated May 27 1969
99 To	Acknowledged May 27 1969
Liberty National Bank and	Recorded May 27 1969 in
Trust Company	Liber [illegible]57 of Mortgages at page 371

Given to secure $13,500.00 on premises. Recites being a purchase money mortgage.

- -

JS Dated May 27 1969 MONROE ABSTRACT & TITLE CORPORATION

bag At '1:17' PM By Thomas F. Clark

Assistant ~~Vice President~~ Secty

- -

SITE CODE: 932052

ANALYTICAL DATA AVAILABLE:
Air- Surface Water- Groundwater-X Soil-X Sediment-

CONTRAVENTION OF STANDARDS:
Groundwater-X Drinking Water- Surface Water- Air-

LEGAL ACTION:

TYPE..: Consent Order State- X Federal-
STATUS: Negotiation in Progress- Order Signed- X

REMEDIAL ACTION:

Proposed- Under design- In Progress-X Completed-
NATURE OF ACTION: RI-FS

GEOTECHNICAL INFORMATION:
SOIL TYPE: Fill(2')Clay-Silt(1.5")Varied clay(3'-4')silt,sand,cly
GROUNDWATER DEPTH: 10'below grd-Bottom of pond 3'-3.5'

ASSESSMENT OF ENVIRONMENTAL PROBLEMS:

Groundwater contaminated with various halogenated organics.

Implementation of Corrective Measures which requires pump and treat of contaminated groundwater and other ancillary measures will address the environmental problems.

ASSESSMENT OF HEALTH PROBLEMS:

The pond is closed and site access is restricted, so the concern is with off-site contaminant migration. The potential exists for public exposures to contaminated overburden and bedrock groundwater and chemicals in Bergholtz Creek. However, the overburden plume is restricted to the site. Overburden wells installed in late 1993 on the east side of Walmore Road have confirmed that the overburden plume has not migrated past Walmore Road and thus has not impacted any residences. Reportedly, all area homes are connected to public water. Private bedrock wells have been decommissioned or are not in use. The potential exists for Public Works employees to be exposed to chemicals migrating within sewer trenches near the Plant site. Exposures to low level chemicals in Creek sediments and waters are possible.

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
INACTIVE HAZARDOUS WASTE DISPOSAL REPORT

CLASSIFICATION CODE: 2 REGION: 9 SITE CODE: 932052
EPA ID: NYD002106276

NAME OF SITE : Bell Aerospace - Textron
STREET ADDRESS: Niagara Falls Blvd, Walmore Rd, PO Box 1, NF,NY

TOWN/CITY:	COUNTY:	ZIP:
Wheatfield	Niagara	14240

SITE TYPE: Open Dump- Structure- Lagoon- Landfill- Treatment Pond-
ESTIMATED SIZE: .5 +/- Acres

SITE OWNER/OPERATOR INFORMATION:
CURRENT OWNER NAME....: Bell Aerospace Textron
CURRENT OWNER ADDRESS.: PO Box 1, Niagara Falls, NY
OWNER(S) DURING USE...: Bell Aircraft - Allied Signal Corp.
OPERATOR DURING USE...: Bell Aerospace Textron
OPERATOR ADDRESS.....: PO Box 1, Niagara Falls, NY
PERIOD ASSOCIATED WITH HAZARDOUS WASTE: From 1950 To 1980

SITE DESCRIPTION:
This site was a pond for collecting runoff and washdown from test cells for rocket engine testing. Monitoring of the flow and pH of the pond was done before discharge into sanitary sewers. DEC has signed Consent Orders with Bell Aerospace for remedial investigation, engineering feasibility, and possible remediation of this site. A comprehensive hydrogeologic investigation was completed at this site. An interim report on the results of the investigations was submitted by Bell's consultant, Golder Associates, in 1987. More work was done in 1988-89 and included additional off-site investigation, investigation of the local sewer trenches, potential for soil gas migration, survey of private wells in the area, and a pump test to define aquifer characteristics for use in evaluating the potential remedial measures. The neutralization pond was physically closed in 1988 in accordance with an approved closure plan. The investigation was completed and a Corrective Measures Study (CMS) has been submitted. The CMS includes a remediation plan and a health risk/environmental risk study.
The NYCRR Part 373 permit has been issued for post-closure care and corrective action. The off-site corrective action system which consists of six pumping wells, has been operational since March 1993. The on-site corrective action system will be operational by mid-1994.

HAZARDOUS WASTE DISPOSED:

TYPE	QUANTITY (units)
Chlorinated Solvents	Unknown
Spilled or residues from rocket fuel	"
Miscellaneous Chemicals	"

New York State Department of Environmental Conservation
Division of Hazardous Waste Remediation

Hazardous Substance Waste Disposal Site - Description

Site Name	LaSalle Reservoir	Registry	D	Site Number	HS9033
Address	Parkridge Ave & E. Amherst St.	Reg. Site ID	915033	HRS Score	2.58
	Buffalo 14215	Site Type	3A	HRS Date	Unknown
County	Erie	RCRA	U	Acres	50.00
Region	9				
		EPA ID	NYD980534606		
Owner	M	Latitude	42 56 43 N		
Owner Name	City of Buffalo	Longitude	78 49 25 W		
Address	U	Quadrangle	Buffalo		
	Buffalo, NY	Is Site Active	U		
Telephone	(716)851-4200	Years of Operation	U to U		
		Completed Investigation?	Phase 2		
Operator	M				
Oper. Name	Same				
Address	Same				
Telephone	Same				

Hazardous Substances Disposed

VOCs	N	Pesticides	Y
Semi-VOCs	Y	Metals	Y
PCBs	N	Asbestos	N

Samples Collected

Groundwater
Surface Soil
Waste

Does a threat to the Environment or the Public Health exist? P

Site Impact Data - Affected Media

Contamination of...		Active Drinking Water Supply?	U
...*Surface Water?*	U	Hazardous Substance Exposed?	N
...*Groundwater?*	Y	Controlled Site Access?	N
...*Drinking Water?*	U	Ambient Air Contamination?	U
Surface Water Class	D	Threat of Direct Contact?	Y
Groundwater Class	U	Documented Fish or Wildlife Mortality?	N
		Impact on special status fish or wildlife resource?	N

Describe the threat posed by disposed hazardous substance.
The site studies do not support verification of CR-T-K paint waste disposal. The contaminants in the groundwater are highest in monitoring well GW-3 which was the presumed upgradient well. The source of contamination may be from an offsite source.

Describe the site.
The site consists of an open quarry now used by the Buffalo Sewer Authority for storm water retention and a recreational park. The park was built on a former portion of the quarry that was filled. The park is actively used by the public. Materials disposed include municipal refuse, incinerator ash, C&D debris, household appliences, tree limbs and paint waste mixed with sawdust, floor sweepings, and refuse from Buffalo Forge Co.

Hazardous Substances Disposed
Lead, pesticides, PAH's and dibenzofuran

Selected Analytical Information

Air

Groundwater

Surface Water

Sediment

Surface Soil

Subsurface Soil

Waste
Lead, pesticides, PAH's and dibenzofuran were found in the waste.

Leachate

EPToxicity

TCLP

Site Impact Data

Surface Water
10,500 feet, southwest

Groundwater
30.4 feet, northwest

Drinking Water
the nearest drinking well is west of the site. The distance is unknown.

Fish or Wildlife Mortality
U

Special Status Fish or Wildlife Resource
U

Building
< 25 feet, south lies a commercial area

Regulatory Agencies Involved
NYSDOH
NYSDEC

Preparer
Julie Welch
NYSDEC
EnvEngrTech2
July 18, 1994

Nominated By

THE BUFFALO ENTERPRISE DEVELOPMENT CORPORATION

Community Economic Development Initiatives • City Commerce Office
Mayor Anthony M. Masiello, Chairman

BUFFALO: THE INTERNATIONAL CROSSROADS OF BUSINESS

November 8, 1996

Mr. Wayne K. Cameron
Sterling Environmental Services, Inc.
1372 Clinton Street
Buffalo, NY 14206

Re: 300 E. Amherst Street - Phase I Environmental Site Assessment

Dear Mr. Cameron:

I have the following comments and questions regarding the Phase I Environmental Site Assessment performed for 300 E. Amherst Street:

did methods

- There was no description of the sampling location or soil conditions at the sampling points. This missing information may be important with respect to the detected PAHs and could have lend some insight to what caused the elevated concentrations. Please provide a description and location of the sampling points.

will have by tomorrow

- There was no QA/QC information regarding the laboratory analysis data included in the Phase I report. The lack of this information makes it difficult to ascertain whether the detection of acetone and methylene chloride are in fact valid results from the soil samples or caused by cross contamination in the laboratory. Please provide this information.

don't interferences among compounds

- It appears as if there were different detection limits used when analyzing the samples for the presence of PCBs. There is no explanation given for this and may have been explained if QA/QC information was available. Please explain.

- A background soil sample was not collected during the Phase I.

All-America City

The Buffalo Enterprise Center • 620 Main Street • Buffalo, New York 14202
Main Number (716) 842-6923 • Voice Mail (716) 842-2667 • Fax (716) 842-6942

from State beyond scope of Phase I

- Several metals were detected above NYS Soil Cleanup levels. However, the metal concentrations were compared to New York State background values to determine the above and not to local soil background values, which may be a more representative comparison. Please collect and provide a background soil sample or, at a minimum, the results of another "representative" soil sample more relevant than New York State background values.

Thank you for addressing these questions. Please feel free to call if you have any questions.

Sincerely,

David A Stebbins

David A. Stebbins
Director of Special Projects

DAS/wsw

cc: Catherine Armitage Singer, Esq.

bc: Dennis Sutton

h:\users\ww\david\cameron1.doc

STERLING
ENVIRONMENTAL SERVICES, INC.

November 23, 1996

David Stebbins
Buffalo Enterprise Development Corp
620 Main Street
Buffalo, NY 14202

Re: 300 East Amherst St, Phase I ESA

Dear Mr. Stebbins:

In response to your letter of November 8 concerning comments and questions about the above referenced Environmental Site Assessment.

* The locations of the two soil samples were addressed in the text and site sketch in section VII in the report. The site sketch may have been difficult to read so I have attached a reworked sketch for your review. Although not stated in the report, the sample locations were staked and flagged at the site. The samples were taken from minor depressions on the site where surface spillage, if any, would have ran to and possibly pooled. There were no visible signs of any such spillage. The upper 6 inches at the sample points, which were discarded, contained the stone which had been spread in the yard and brown loam. The soil beneath this, which was sampled, consisted mostly of brown loam with traces of the top stone. No debris, staining or odors were observed in the sample interval or the overlaying soils.

* The QA/QC data from the laboratory that you requested is attached. Please note that Methylene Chloride was detected in the method blank (page 9) but within the acceptable limit.

* The laboratory QA/QC report does not address the different detection limits for PCBs between the two samples. The different detection limits for the two samples result from minor variation in the weight of sample analyzed. Please note that the PCB detection limits are in ug/Kg or ppb.

* A background soil sample was not collected for this site. A single soil sample would not be adequate to establish site specific background levels. In addition the background soil samples must be collected from off-site. We would need

1372 CLINTON STREET • BUFFALO, NEW YORK 14206 • PHONE (716) 824-2407 • FAX (716) 824-2441

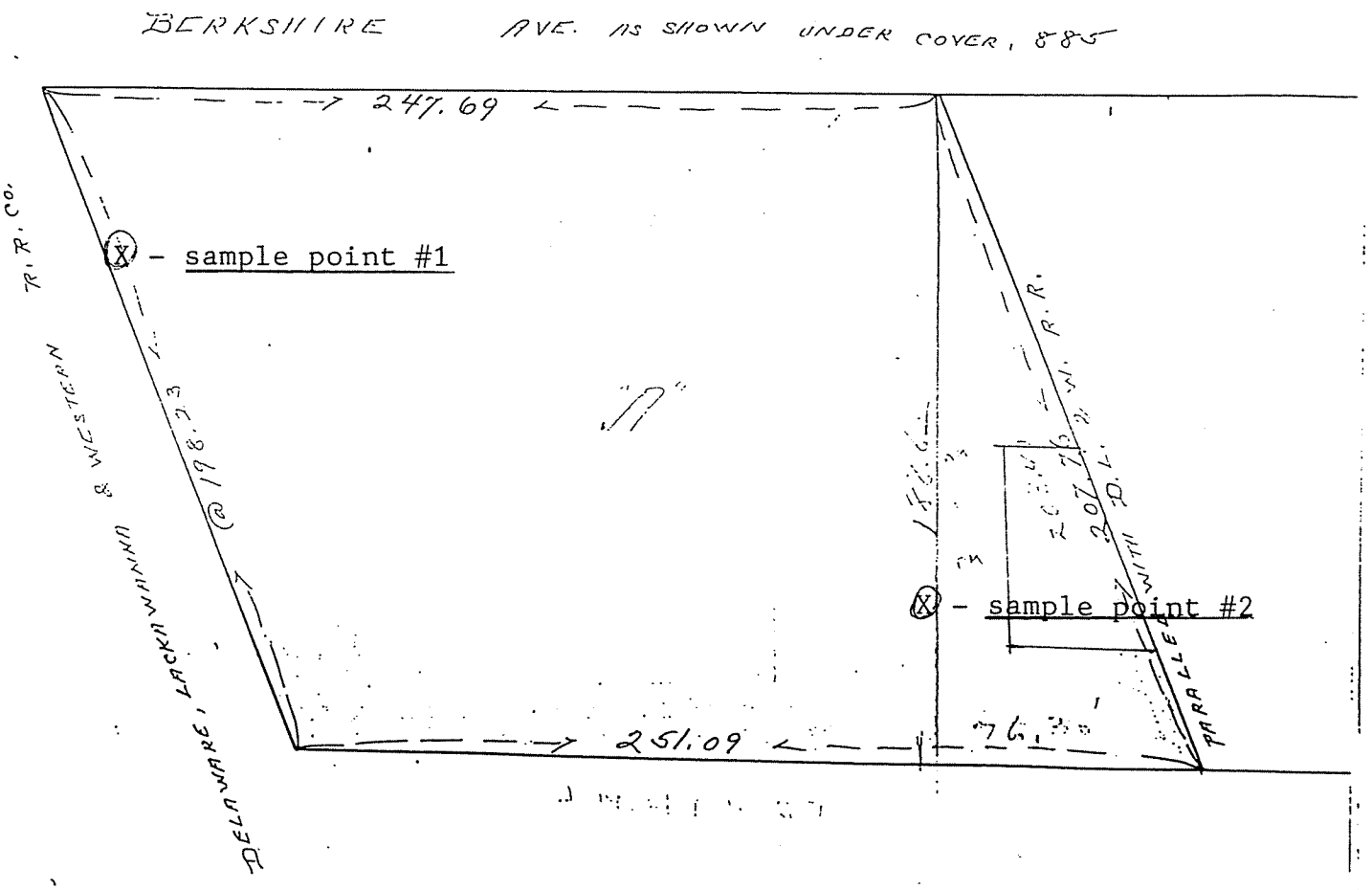
permission from the off-site property owners to collect any such samples. A site specific background level study is beyond the scope of this site assessment. We do not have analysis on file that would be useful in determining background levels in the area. With few exceptions the sampling that we perform is to confirm or rule out suspected contamination. As such the analytical results would not necessarily be indicative of background levels.

I trust that this information will be helpful. If you have any further question please feel free to contact me.

Sincerely,

Wayne K. Cameron, CHMM

SAMPLE LOCATION SITE SKETCH



ACTS TESTING LABS, INC.
3916 Broadway
Buffalo, NY 14227-1104
Tel (716) 684-3300
Fax (716) 684-3303

November 22, 1996

ELAP ID# 10247

Technical Report #6B-08841ER
Project Name: 300 E. Amherst
REVISED REPORT

Mr. Wayne Cameron
STERLING ENVIRONMENTAL
1372 Clinton Street
Buffalo, NY 14206

SUBJECT:

Analyses of two (2) soil sample received on October 7, 1996.

RESULTS:

See Pages Two through Seventeen.

EXPERIMENTAL:

"Test Methods for Evaluating Solid Waste: Physical/Chemical Methods," SW-846, 3rd Edition, September 1994.

ACTS TESTING LABS, INC.
Charles E. Hartke
Manager, Chemistry Laboratory

ACTS TESTING LABS, INC.
Elizabeth R. Hausler, Supervisor
Gas Chromatography Laboratory

ACTS TESTING LABS, INC.
Lisa M. Clerici, Supervisor
Wet Chemistry Laboratory

cme

RESULTS:

TAL METALS	ACTS #6B-08841E 96-107A	ACTS #6B-08842E 96-107B
Aluminum, Total	10400	5670
Antimony, Total	5.70	< 5.50
Arsenic, Total	8.60	23.3
Barium, Total	62.3	174
Beryllium, Total	< 0.559	< 0.550
Cadmium, Total	< 0.559	1.10
Calcium, Total	9580	58300
Chromium, Total	11.3	47.9
Cobalt, Total	9.83	19.6
Copper, Total	9.83	134
Iron, Total	13100	64200
Lead, Total	26.8	271
Magnesium, Total	6630	15700
Manganese, Total	867	637
Mercury, Total	0.747 (0.564)* (0.58)**	0.533 (0.418)* (0.496)**
Nickel, Total	16.3	47.0
Potassium, Total	877	970
Selenium, Total	< 13.4	< 13.2
Silver, Total	< 0.559	< 0.550
Sodium, Total	234	295
Thallium, Total	< 5.59	< 5.50
Vanadium, Total	39.2	103
Zinc, Total	336	564
Cyanide	< 0.070	< 0.068

Results are reported as micrograms per gram (ug/g).
*=Duplicate results
**=Triplicate results

TCL PCBs		
Polychlorinated Biphenyls as:		
Arochlor 1016	< 9.2	< 8.9
Arochlor 1221	< 9.2	< 8.9
Arochlor 1232	< 9.2	< 8.9
Arochlor 1242	< 9.2	< 8.9
Arochlor 1248	< 9.2	< 8.9
Arochlor 1254	< 9.2	< 8.9
Arochlor 1260	< 9.2	< 8.9

Results are reported as micrograms per kilogram (ug/Kg)

RESULTS:

TAL PESTICIDES	ACTS #6B-08841E 96-107A	ACTS #6B-08842E 96-107B
alpha-BHC	< 1.8	< 1.8
gamma-BHC	< 1.8	< 1.8
beta-BHC	< 1.8	< 1.8
Heptachlor	< 1.8	< 1.8
delta-BHC	< 1.8	< 1.8
Aldrin	< 1.8	< 1.8
Heptachlor epoxide	< 1.8	< 1.8
Endosulfan I	< 1.8	< 1.8
4,4'-DDE	< 1.8	< 1.8
Dieldrin	< 1.8	< 1.8
Endrin	< 1.8	< 1.8
4,4'-DDD	< 1.8	< 1.8
Endosulfan II	< 1.8	< 1.8
4,4'-DDT	< 5.0	< 1.8
Endrin aldehyde	< 1.8	< 1.8
Endodulfan sulfate	< 1.8	< 1.8
Methoxychlor	< 7.4	< 7.1
Chlordane	< 9.2	< 8.9
Toxaphene	< 9.2	< 8.9

Results are reported as micrograms per kilogram (ug/Kg).

TAL VOLATILES		
Dichlorodifluoromethane	< 1.4	< 1.4
Chloromethane	< 1.4	< 1.4
Vinyl Chloride	< 1.4	< 1.4
Bromomethane	< 1.4	< 1.4
Chloroethane	< 1.4	< 1.4
1,1-Dichloroethene	< 0.7	< 0.7
Acetone	240	550
Carbon Disulfide	4.0	2.0
Methylene Chloride	350	260
trans-1,2-Dichloroethene	< 0.7	< 0.7
1,1-Dichloroethane	< 0.7	< 0.7
Chloroform	10.0	7.0
1,2-Dichloroethane	< 0.7	< 0.7
2-Butanone	< 1.4	< 1.4
1,1,1-Trichloroethane	< 0.7	< 0.7
Carbon Tetrachloride	< 0.7	< 0.7

Results are reported as micrograms per kilogram (ug/Kg).

TAL VOLATILES (con't)	ACTS #6B-08841E 96-107A	ACTS #6B-08842E 96-107B
Benzene	< 0.7	< 0.7
Trichloroethene	2.0	< 0.7
1,2-Dichloropropane	< 0.7	< 0.7
Bromodichloromethane	< 0.7	< 0.7
cis-1,3-Dichloropropene	< 0.7	< 0.7
4-Methyl-2-pentanone	< 0.7	33.0
2-Hexanone	< 7.0	< 7.0
Toluene	10.0	93.0
trans-1,3-Dichloropropene	< 0.7	< 0.7
1,1,2-Trichloroethane	< 0.7	< 0.7
Tetrachloroethene	< 0.7	< 0.7
Dibromochloromethane	< 0.7	< 0.7
1,2-Dibromoethane	< 0.7	< 0.7
Chlorobenzene	< 0.7	< 0.7
Ethylbenzene	4.0	7.0
M,P-Xylenes	7.0	23.0
O-Xylene	2.0	4.0
Styrene	< 0.7	< 0.7
Bromoform	< 0.7	< 0.7
1,1,2,2-Tetrachloroethane	< 0.7	< 0.7
1,2-Dibromo-3-chloropropane	< 0.7	< 0.7
Bromochloromethane	< 0.7	< 0.7
cis-1,2-Dichloroethene	< 0.7	< 0.7

Results are reported as micrograms per kilogram (ug/Kg).

TAL SEMI VOLATILES		
N-Nitroso-dimethylamine	< 760	< 680
Phenol	< 380	< 340
Bis (2-chloroethyl) ether	< 380	< 340
2-Chlorophenol	< 380	< 340
1,3-Dichlorobenzene	< 380	< 340
1,4-Dichlorobenzene	< 380	< 340
1,2-Dichlorobenzene	< 380	< 340
Bis (2-chloroisopropyl) ether	< 380	< 340
2-Methylphenol	< 380	< 340
N-Nitroso-di-n-propylamine	< 380	< 340
Hexachloroethane	< 380	< 340
4-Methylphenol	< 380	< 340
Nitrobenzene	< 380	< 340

Results are reported as micrograms per kilogram (ug/Kg).

TAL SEMI VOLATILES (con't)	ACTS #6B-08841E 96-107A	ACTS #6B-08842E 96-107B
Isophorone	< 380	< 340
2-Nitrophenol	< 380	< 340
2,4-Dimethylphenol	< 380	< 340
Bis (2-chloroethoxy) methane	< 380	< 340
2,4-Dichlorophenol	< 380	< 340
1,2,4-Trichlorobenzene	< 380	< 340
Naphthalene	< 380	< 340
4-Chloroaniline	< 380	< 340
Hexachlorobutadiene	< 760	< 680
4-Chloro-3-methylphenol	< 380	< 340
2-Methylnaphthalene	< 3800	< 3400
Hexachlorocyclopentadiene	< 3800	< 3400
2,4,6-Trichlorophenol	< 1900	< 1700
2,4,5-Trichlorophenol	< 1900	< 1700
2-Chloronaphthalene	< 380	< 340
2-Nitroaniline	< 380	< 340
Dimethylphthalate	< 380	< 340
Acenaphthylene	< 380	< 340
2,6-Dinitrotoluene	< 380	< 340
Acenaphthene	< 380	< 340
3-Nitroaniline	< 760	< 680
2,4-Dinitrophenol	< 380	< 340
Dibenzofuran	< 380	< 340
2,4-Dinitrotoluene	< 380	< 340
4-Nitrophenol	< 3800	< 3400
Diethylphthalate	< 380	< 340
Fluorene	< 380	< 340
4-Nitroaniline	< 760	< 680
4-Chlorophenyl phenyl ether	< 760	< 680
4,6-Dinitro-2-methylphenol	< 760	< 680
N-Nitrosodiphenylamine	< 380	< 340
4-Bromophenyl phenyl ether	< 380	< 340
Hexachlorobenzene	< 380	< 340
Pentachlorophenol	< 380	< 340
Phenanthrene	< 380	620
Anthracene	< 380	< 340
Carbazole	< 380	< 340
Di-n-butyl phthlate	< 380	< 340
Fluoranthene	< 380	1100
Pyrene	< 380	1200
Butyl benzyl phthalate	< 380	< 340

Results are reported as micrograms per kilogram (ug/Kg).

TAL SEMI VOLATILES (con't)	ACTS #6B-08841E 96-107A	ACTS #6B-08842E 96-107B
Benzo(a)anthracene	< 380	570
3-3'-Dichlorobenzidine	< 760	< 680
Chrysene	< 380	570
Bis (2-ethylhexyl) phthlate	< 380	< 340
Di-n-octyl phthlate	< 380	< 340
Benzo(b)fluoranthene	< 380	620
Benzo(k)fluoranthene	< 380	510
Benzo(a)pyrene	< 380	660
Indeno(1,2,3-cd) pyrene	< 380	< 340
Dibenzo(a,h)anthracene	< 380	< 340
Benzo(g,h,i)perylene	640	560

Results are reported as micrograms per kilogram (ug/kg).

QUALITY CONTROL DATA

METHOD BLANK RESULTS

EPA 8270 SEMI VOLATILES	RESULTS	LIMITS
N-Nitroso-dimethylamine	< 67.0	134
Phenol	< 33.0	66.0
Bis (2-chloroethyl) ether	< 33.0	66.0
2-Chlorophenol	< 33.0	66.0
1,3-Dichlorobenzene	< 33.0	66.0
1,4-Dichlorobenzene	< 33.0	66.0
1,2-Dichlorobenzene	< 33.0	66.0
Bis (2-chloroisopropyl) ether	< 33.0	66.0
2-Methylphenol	< 33.0	66.0
N-Nitroso-di-n-propylamine	< 33.0	66.0
Hexachloroethane	< 33.0	66.0
4-Methylphenol	< 33.0	66.0
Nitrobenzene	< 33.0	66.0
Isophorone	< 33.0	66.0
2-Nitrophenol	< 33.0	66.0
2,4-Dimethylphenol	< 33.0	66.0
Bis (2-chloroethoxy) methane	< 33.0	66.0
2,4-Dichlorophenol	< 33.0	66.0
1,2,4-Trichlorobenzene	< 33.0	66.0
Naphthalene	< 33.0	66.0
4-Chloroaniline	< 33.0	66.0
Hexachlorobutadiene	< 67.0	134
4-Chloro-3-methylphenol	< 33.0	66.0
2-Methylnaphthalene	< 330	660
Hexachlorocyclopentadiene	< 330	660
2,4,6-Trichlorophenol	< 170	340
2,4,5-Trichlorophenol	< 170	340
2-Chloronaphthalene	< 33.0	66.0
2-Nitroaniline	< 33.0	66.0
Dimethylphthalate	< 33.0	66.0
Acenaphthylene	< 33.0	66.0
2,6-Dinitrotoluene	< 33.0	66.0
Acenaphthene	< 33.0	66.0
3-Nitroaniline	< 67.0	134
2,4-Dinitrophenol	< 33.0	66.0
Dibenzofuran	< 33.0	66.0
2,4-Dinitrotoluene	< 33.0	66.0
4-Nitrophenol	< 330	660

Results are reported as micrograms per kilogram (ug/Kg).

METHOD BLANK RESULTS

EPA 8270 SEMI VOLATILES	RESULTS	LIMITS
Diethylphthalate	< 33.0	66.0
Fluorene	< 33.0	66.0
4-Nitroaniline	< 67.0	134
4-Chlorophenyl phenyl ether	< 67.0	134
4,6-Dinitro-2-methylphenol	< 67.0	134
N-Nitrosodiphenylamine	< 33.0	66.0
4-Bromophenyl phenyl ether	< 33.0	66.0
Hexachlorobenzene	< 33.0	66.0
Pentachlorophenol	< 33.0	66.0
Phenanthrene	< 33.0	66.0
Anthracene	< 33.0	66.0
Carbazole	< 33.0	66.0
Di-n-butyl phthlate	< 33.0	66.0
Fluoranthene	< 33.0	66.0
Pyrene	< 33.0	66.0
Butyl benzyl phthalate	< 33.0	66.0
Benzo(a)anthracene	< 33.0	66.0
3-3'-Dichlorobenzidine	< 67.0	134
Chrysene	< 33.0	66.0
Bis (2-ethylhexyl) phthlate	< 33.0	66.0
Di-n-octyl phthlate	< 33.0	66.0
Benzo(b)fluoranthene	< 33.0	66.0
Benzo(k)fluoranthene	< 33.0	66.0
Benzo(a)pyrene	< 33.0	66.0
Indeno(1,2,3-cd) pyrene	< 33.0	66.0
Dibenzo(a,h)anthracene	< 33.0	66.0
Benzo(g,h,i)perylene	< 33.0	66.0

Results are reported as micrograms per kilogram (ug/Kg).

QUALITY CONTROL DATA

METHOD BLANK RESULTS

TCL VOLATILES	RESULTS	LIMITS
Dichlorodifluoromethane	< 1.0	2.0
Chloromethane	< 1.0	2.0
Vinyl Chloride	< 1.0	2.0
Bromomethane	< 1.0	2.0
Chloroethane	< 1.0	2.0
1,1-Dichloroethene	< 0.5	1.0
Acetone	< 5.0	1.0
Carbon Disulfide	< 0.5	1.0
Methylene Chloride	9.0	10.0
trans-1,2-Dichloroethene	< 0.5	1.0
1,1-Dichloroethane	< 0.5	1.0
Chloroform	< 0.5	1.0
1,2-Dichloroethane	< 0.5	1.0
2-Butanone	< 1.0	2.0
1,1,1-Trichloroethane	< 0.5	1.0
Carbon Tetrachloride	< 0.5	1.0
Benzene	< 0.5	1.0
Trichloroethene	< 0.5	1.0
1,2-Dichloropropane	< 0.5	1.0
Bromodichloromethane	< 0.5	1.0
cis-1,3-Dichloropropene	< 0.5	1.0
4-Methyl-2-pentanone	< 0.5	1.0
2-Hexanone	< 5.0	10.0
Toluene	< 0.5	1.0
trans-1,3-Dichloropropene	< 0.5	1.0
1,1,2-Trichloroethane	< 0.5	1.0
Tetrachloroethene	< 0.5	1.0
Dibromochloromethane	< 0.5	1.0
1,2-Dibromoethane	< 0.5	1.0
Chlorobenzene	< 0.5	1.0
Ethylbenzene	< 0.5	1.0
M,P-Xylenes	< 1.0	2.0
O-Xylene	< 0.5	1.0
Styrene	< 0.5	1.0
Bromoform	< 0.5	1.0
1,1,2,2-Tetrachloroethane	< 0.5	1.0
1,2-Dibromo-3-chloropropane	< 0.5	1.0

Results are reported as micrograms per kilogram (ug/Kg).

QUALITY CONTROL DATA

EPA 8270 SURROGATE RECOVERY

	S1	S2	S3	S4	S5	S6	S7	S8
MB100996	78	75	86	66	61	75	68	99
SB100996	75	79	81	65	64	77	84	88
6B-08841E	110	110	120	100	90	110	60	110
6B-08842E	100	100	110	80	70	100	67	110
6B-08843E	110	110	120	100	80	110	77	110

	QC LIMITS
S1=2-Fluorophenol-ss	25-121
S2=Phenol-d5-ss	24-113
S3=2-Chlorophenol-d4-ss	20-130
S4=1,2-Dichlorobenzene-d4-ss	20-130
S5=Nitrobenzene-d5-ss	23-120
S6=2-Fluorobiphenyl-ss	30-115
S7=2,4,6-Tribromophenol-ss	19-122
S8=4-Terphenyl-d14-ss	18-137

TCL VOLATILE SYSTEM MONITORING COMPOUND RECOVERY

	SMC1	SMC2	SMC3
MB101996	103	99	103
SB101996	101	100	98
6B-08841E	78*	94	108
6B-08842E	80*	90	110

	QC-LIMITS
SMC1=1,2-Dichloroethane-d4	94-136
SMC2=Toluene-d8	84-106
SMC3=4-Bromofluorobenzene	77-132

METHOD BLANK DATA

	MB100896	QC LIMITS
Cyanide	< 0.003	0.006

Result is reported as micrograms per gram (ug/g).

	MB100996	QC LIMITS
Silver	< 0.005	0.010
Aluminum	< 0.05	0.10
Arsenic	< 0.05	0.10
Barium	< 0.005	0.010
Beryllium	< 0.005	0.010
Calcium	< 0.02	0.04
Cadmium	< 0.005	0.010
Cobalt	< 0.01	0.02
Chromium	< 0.01	0.02
Copper	< 0.01	0.02
Iron	< 0.03	0.06
Potassium	< 0.10	0.20
Magnesium	< 0.05	0.10
Manganese	< 0.005	0.010
Sodium	< 0.05	0.10
Nickel	< 0.01	0.02
Lead	< 0.03	0.06
Antimony	< 0.05	0.10
Selenium	< 0.12	0.24
Thallium	< 0.05	0.10
Vanadium	< 0.01	0.02
Zinc	< 0.01	0.02

Results are reported as micrograms per gram (ug/g).

METHOD BLANK DATA

TCL PESTICIDE/PCB METHOD BLANK RESULTS

	METHOD BLANK	QC LIMITS
alpha-BHC	< 1.7	3.4
gamma-BHC	< 1.7	3.4
beta-BHC	< 1.7	3.4
Heptachlor	< 1.7	3.4
delta-BHC	< 1.7	3.4
Aldrin	< 1.7	3.4
Heptachlor epoxide	< 1.7	3.4
Endosulfan I	< 1.7	3.4
4,4'-DDE	< 1.7	3.4
Dieldrin	< 1.7	3.4
Endrin	< 1.7	3.4
4,4'-DDD	< 1.7	3.4
Endosulfan II	< 1.7	3.4
4,4'-DDT	< 1.7	3.4
Endrin aldehyde	< 1.7	3.4
Endodulfan sulfate	< 1.7	3.4
Methoxychlor	< 6.7	13.4
Chlordane	< 8.3	16.6
Toxaphene	< 8.3	16.6
PCB1016	< 8.3	16.6
PCB1221	< 8.3	16.6
PCB1232	< 8.3	16.6
PCB 1242	< 8.3	16.6
PCB1248	< 8.3	16.6
PCB1254	< 8.3	16.6
PCB1260	< 8.3	16.6

Results are reported as micrograms per kilogram (ug/Kg).

SPIKE BLANK DATA

TCL PESTICIDE/PCB METHOD BLANK RESULTS

	SPIKE BLANK	QC LIMITS
alpha-BHC	86.8	39.97-125.25
gamma-BHC	87.6	41.16-124.76
beta-BHC	83.0	44.0-133.34
Heptachlor	86.9	19.39-190.47
delta-BHC	89.2	33.08-121.42
Aldrin	86.8	43.86-122.94
Heptachlor epoxide	88.4	47.04-134.34
Endosulfan I	83.6	94.17-129.80
4,4'-DDE	87.5	38.67-127.86
Dieldrin	89.9	40.82-137.72
Endrin	97.9	8.88-181.28
4,4'-DDD	91.8	16.92-153.64
Endosulfan II	84.3	21.71-141.22
4,4'-DDT	82.3	4.10-163.67
Endrin aldehyde	75.7	18.91-123.07
Endodulfan sulfate	88.8	4.98-150.90
Methoxychlor	83.0	32.31-196.46

	SB100896	QC LIMITS
Cyanide	69.0	55.01-108.1

Result is reported as percent (%).

SPIKE BLANK RESULTS

	SB100996	QC LIMITS
Silver	63.8	80-120
Aluminum	90.6	80-120
Arsenic	97.3	80-120
Barium	91.1	80-120
Beryllium	94.2	80-120
Calcium	87.7	80-120
Cadmium	100	80-120
Cobalt	103	80-120
Chromium	91.9	80-120
Copper	91.3	80-120
Iron	112	80-120
Potassium	97.1	80-120
Magnesium	92.6	80-120
Manganese	90.4	80-120
Sodium	144	80-120
Nickel	91.6	80-120
Lead	95.6	80-120
Antimony	95.7	80-120
Selenium	89.4	80-120
Thallium	99.4	80-120
Vanadium	98.6	80-120
Zinc	90.9	80-120

Results are reported as micrograms per gram (ug/g).

SPIKE BLANK DATA

TCL VOLATILES

	SPIKE BLANK DATA	QC LIMITS
Dichlorodifluoromethane	48.0	4.5-170.8
Chloromethane	106	20.5-142.2
Vinyl Chloride	76.0	8.2-142.8
Bromomethane	104	11.4-185.2
Chloroethane	98.0	31.4-174.3
1,1-Dichloroethene	96.0	8.6-216.1
Acetone	90.0	D-340.1
Carbon Disulfide	116	14.1-241.9
Methylene Chloride	136	D-252.5
trans-1,2-Dichloroethene	84.0	D-257.5
1,1-Dichloroethane	104	44.0-159.1
Chloroform	108	13.1-211.3
1,2-Dichloroethane	108	33.6-191.5
2-Butanone	80.0	D-211.6
1,1,1-Trichloroethane	100	69.3-140.5
Carbon Tetrachloride	96.0	60.5-142.3
Benzene	108	44.3-174.3
Trichloroethene	104	58.9-152.4
1,2-Dichloropropane	116	20-206.3
Bromodichloromethane	112	43.9-178.2
cis-1,3-Dichloropropene	110	36.0-160.3
4-Methyl-2-pentanone	98.0	D-238.2
2-Hexanone	80.0	8.1-189.9
Toluene	116	60.1-150.7
trans-1,3-Dichloropropene	104	55.4-171.2
1,1,2-Trichloroethane	106	59.7-151.1
Tetrachloroethene	104	41.7-147.6
Dibromochloromethane	104	61.5-156.9
1,2-Dibromoethane	104	77.5-128.3
Chlorobenzene	114	79.9-131.1
Ethylbenzene	112	77.0-128.6
M,P-Xylenes	110	60.7-151.7
O-Xylene	116	52.6-165.4
Styrene	112	72.8-134
Bromoform	96.0	57.3-158.8
1,1,2,2-Tetrachloroethane	98.0	39.2-188.6
1,2-Dibromo-3-chloropropane	92.0	63.8-157.5

Results are reported as percent (%).
D=Detected

SPIKE BLANK DATA

TCL 8270 SEMI VOLATILES

	SPIKE BLANK DATA	QC LIMITS
N-Nitroso-dimethylamine	63.0	NE
Phenol	70.0	5-112
Bis (2-chloroethyl) ether	71.0	12-158
2-Chlorophenol	76.0	23-134
1,3-Dichlorobenzene	62.0	D-172
1,4-Dichlorobenzene	63.0	20-124
1,2-Dichlorobenzene	64.0	32-129
Bis (2-chloroisopropyl) ether	102	36-166
2-Methylphenol	83.0	NE
N-Nitroso-di-n-propylamine	77.0	D-230
Hexachloroethane	59.0	40-113
4-Methylphenol	75.0	NE
Nitrobenzene	66.0	35-180
Isophorone	64.0	21-196
2-Nitrophenol	83.0	29-182
2,4-Dimethylphenol	71.0	32-119
Bis (2-chloroethoxy) methane	73.0	33-184
2,4-Dichlorophenol	74.0	39-135
1,2,4-Trichlorobenzene	68.0	44-142
Naphthalene	72.0	21-133
4-Chloroaniline	84.0	NE
Hexachlorobutadiene	61.0	24-116
4-Chloro-3-methylphenol	73.0	22-147
2-Methylnaphthalene	82.0	NE
Hexachlorocyclopentadiene	39.0	NE
2,4,6-Trichlorophenol	66.0	37-144
2,4,5-Trichlorophenol	71.0	NE
2-Chloronaphthalene	76.0	60-118
2-Nitroaniline	87.0	NE
Dimethylphthalate	91.0	D-112
Acenaphthylene	77.0	33-145
2,6-Dinitrotoluene	83.0	50-158
Acenaphthene	82.0	47-145
3-Nitroaniline	78.0	NE
2,4-Dinitrophenol	30.0	39-139
Dibenzofuran	85.0	NE
2,4-Dinitrotoluene	85.0	39-139
4-Nitrophenol	82.0	D-132
Diethylphthalate	91.0	D-114

Results are reported as percent (%).

SPIKE BLANK DATA

TCL 8270 SEMI VOLATILES

	SPIKE BLANK DATA	QC LIMITS
Fluorene	81.0	59-121
4-Nitroaniline	88.0	NE
4-Chlorophenyl phenyl ether	85.0	25-158
4,6-Dinitro-2-methylphenol	26.0	D-191
N-Nitrosodiphenylamine	90.0	NE
4-Bromophenyl phenyl ether	81.0	36-166
Hexachlorobenzene	88.0	D-152
Pentachlorophenol	24.0	14-176
Phenanthrene	86.0	54-120
Anthracene	89.0	27-133
Di-n-butyl phthlate	96.0	1-118
Fluoranthene	80.0	26-137
Pyrene	94.0	52-115
Butyl benzyl phthalate	103	D-152
Benzo(a)anthracene	90.0	33-143
3-3'-Dichlorobenzidine	75.0	D-262
Chrysene	90.0	17-168
Bis (2-ethylhexyl) phthlate	117	8-158
Di-n-octyl phthlate	116	4-146
Benzo(b)fluoranthene	93.0	24-159
Benzo(k)fluoranthene	98.0	11-162
Benzo(a)pyrene	88.0	17-163
Indeno(1,2,3-cd) pyrene	103	D-171
Dibenzo(a,h)anthracene	74.0	D-227
Benzo(g,h,i)perylene	97.0	D-219

Results are reported as percent (%).