
BROWNFIELD CLEANUP PROGRAM

SITE MANAGEMENT PLAN

**300 OHIO STREET SITE
NYSDEC SITE NUMBER: C915257
BUFFALO, NEW YORK**

December 2017

0136-037-102

Prepared for:

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Revisions to Final Approved Site Management Plan:

Revision #	Submitted Date	Summary of Revision	DEC Approval Date

Certification Statement

I, Thomas H. Forbes, certify that I am currently a NYS registered professional engineer and that this December 2017 Site Management Plan for the 300 Ohio Street Site (C915257) was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

_____ Signature

_____ Date



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List of Acronyms

ASP	Analytical Services Protocol
BCA	Brownfield Cleanup Agreement
BCP	Brownfield Cleanup Program
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CAMP	Community Air Monitoring Plan
C/D	Construction and Demolition
CFR	Code of Federal Regulation
CLP	Contract Laboratory Program
COC	Certificate of Completion
CO2	Carbon Dioxide
CP	Commissioner Policy
DER	Division of Environmental Remediation
EC	Engineering Control
ECL	Environmental Conservation Law
ELAP	Environmental Laboratory Approval Program
EWP	Excavation Work Plan
FOP	Field Operating Procedure
GHG	Green House Gas
HASP	Health and Safety Plan
IC	Institutional Control
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
NYCRR	New York Codes, Rules, and Regulations
O&M	Operations and Maintenance
OM&M	Operation, Maintenance and Monitoring
OSHA	Occupational Safety and Health Administration
OU	Operable Unit
PID	Photoionization Detector
PRP	Potentially Responsible Party
PRR	Periodic Review Report
QA/QC	Quality Assurance/Quality Control
QAPP	Quality Assurance Project Plan
RAO	Remedial Action Objective
RAWP	Remedial Action Work Plan
RCRA	Resource Conservation and Recovery Act
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
RP	Remedial Party

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List of Acronyms

RSO	Remedial System Optimization
SCG	Standards, Criteria, and Guidelines
SCO	Soil Cleanup Objective
SOP	Standard Operating Procedures
SOW	Statement of Work
SPDES	State Pollutant Discharge Elimination System
SSD	Sub-slab Depressurization
SVI	Soil Vapor Intrusion
TAL	Target Analyte List
TCL	Target Compound List
TCLP	Toxicity Characteristic Leachate Procedure
USEPA	United States Environmental Protection Agency
UST	Underground Storage Tank

EXECUTIVE SUMMARY

The following provides a brief summary of the controls implemented for the 300 Ohio Street Site, as well as the inspections, monitoring, maintenance and reporting activities required by this Site Management Plan:

Site Identification: C915287 – 300 Ohio Street Site

Institutional Controls:	1. The property may be used for commercial and industrial use as described in 6 NYCRR Part 375-1.8(g), although land is subject to local zoning laws;
	2. All ECs must be inspected at a frequency and in a manner defined in the SMP.
	3. The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or the Erie County Department of Health to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department.
	4. Compliance with the Department approved Site Management Plan and Periodic Review Reporting is required.
	5. The remedial party or site owner is required to complete and submit a periodic certification of institutional and engineering controls to the Department in accordance with 6NYCRR Part 375-1.8(h)(3).
Engineering Controls:	1. A site cover has been placed over the site in all areas exceeding applicable SCOs. The cover is either a hardscape (asphalt and concrete, building) and/or a minimum of 12-inches of depth of material meeting the requirements as set forth in 6NYCRR Part 375—6.7(d) for commercial use.
Inspections:	Frequency
1. Cover inspection	Annually
Reporting:	
1. Annual Site Inspection	Annually
2. Periodic Review Report	Triennially, after submittal of initial PRR.

Further descriptions of the above requirements are provided in detail in the latter sections of this Site Management Plan.

1.0 INTRODUCTION

This Site Management Plan (SMP) is a required element of the remedial program for the 300 Ohio Street Site located in the City of Buffalo, New York (hereinafter referred to as the “Site”, see Figures 1 and 2) under the New York State (NYS) Brownfield Cleanup Program (BCP) Site No. C915257 which is administered by New York State Department of Environmental Conservation (NYSDEC).

1.1 General

The Volunteer, 4216 Group, LLC, entered into a Brownfield Cleanup Agreement (BCA) on November 9, 2011 with the NYSDEC to remediate the Site, located in Buffalo, New York (see Figures 1 and 2). The boundaries of the site are more fully described in the metes and bounds site description that is part of the Environmental Easement provided in Appendix A.

After completion of the remedial work, some contamination was left at this site, which is hereafter referred to as “remaining contamination.” Institutional and Engineering Controls (ICs and ECs) have been incorporated into the site remedy to control exposure to remaining contamination to ensure protection of public health and the environment. An Environmental Easement granted to the NYSDEC, and recorded with the Erie County Clerk, requires compliance with this SMP and all ECs and ICs placed on the site.

This SMP was prepared by Benchmark Environmental Engineering & Science, PLLC in association with TurnKey Environmental Restoration, LLC, to manage remaining contamination at the site until the Environmental Easement is extinguished in accordance with ECL Article 71, Title 36. This plan has been approved by the NYSDEC, and compliance with this plan is required by the grantor of the Environmental Easement and the grantor’s successors and assigns. This SMP may only be revised with the approval of the NYSDEC and NYSDOH.

It is important to note that:

- This SMP details the site-specific implementation procedures that are required by the Environmental Easement. Failure to properly implement the SMP is a violation of the Environmental Easement, which is grounds for revocation of the Certificate of Completion (COC);

- Failure to comply with this SMP is also a violation of Environmental Conservation Law, 6NYCRR Part 375 and the BCA (Index #C915257-09-11; Site #C915257) for the site, and thereby subject to applicable penalties.

All reports associated with the site can be viewed by contacting the NYSDEC or its successor agency managing environmental issues in New York State.

This SMP was prepared by Benchmark Environmental Engineering & Science, PLLC in affiliation with Turnkey Environmental Restoration, LLC, on behalf of 4216 Group, LLC, in accordance with the requirements of the NYSDEC's DER-10 ("Technical Guidance for Site Investigation and Remediation"), dated May 2010, and the guidelines provided by the NYSDEC. This SMP addresses the means for implementing the ICs and/or ECs that are required by the Environmental Easement for the site.

1.2 Revisions

Revisions to this plan will be proposed in writing to the NYSDEC's project manager. Revisions will be necessary upon, but not limited to, the following occurring: a change in media monitoring requirements, upgrades to or shut-down of a remedial system, post-remedial removal of contaminated sediment or soil, or other significant change to the site conditions. In accordance with the Environmental Easement for the site, the NYSDEC will provide a notice of any approved changes to the SMP, and append these notices to the SMP that is retained in its files.

1.3 Notifications

Notifications will be submitted by the property owner to the NYSDEC, as needed, in accordance with NYSDEC's DER – 10 for the following reasons:

- 60-day advance notice of any proposed changes in site use that are required under the terms of the BCA, 6NYCRR Part 375 and/or Environmental Conservation Law.
- 7-day advance notice of any field activity associated with the remedial program.
- 15-day advance notice of any proposed ground-intrusive activity pursuant to the Excavation Work Plan.

- Notice within 48-hours of any damage or defect to the foundation, structures, or EC that reduces or has the potential to reduce the effectiveness of an EC, and likewise, any action to be taken to mitigate the damage or defect.
- Verbal notice by noon of the following day of any emergency, such as a fire; flood; or earthquake that reduces or has the potential to reduce the effectiveness of ECs in place at the site, with written confirmation within 7 days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public.
- Follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action submitted to the NYSDEC within 45 days describing and documenting actions taken to restore the effectiveness of the ECs.

The owner of the site parcel at the time of issuance of this SMP is:

4216 Group, LLC
295 Main Street, Suite 210
Buffalo, New York 14203

Any change in the ownership of the site or the responsibility for implementing this SMP will include the following notifications:

- At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser/Remedial Party has been provided with a copy of the Brownfield Cleanup Agreement (BCA) and all approved work plans and reports, including this SMP.
- Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing to the NYSDEC.

Table 1 (below) includes contact information for the above notification. The information on this table will be updated as necessary to provide accurate contact information.

Table 1: Notifications*

Name	Contact Information
NYSDEC Project Manager Mr. Anthony Lopes, P.E.	716-851-7220 Anthony.lopes@dec.ny.gov
NYSDEC Regional HW Engineer Mr. Chad Staniszewski, P.E.	716-851-7220 Chad.staniszewski@dec.ny.gov
NYSDEC Site Control Ms. Kelly Lewandowski	518-402-9543 Kelly.lewandowski@dec.ny.gov
NYSDOH Public Health Specialist Ms. Scarlett McLaughlin	518-402-7860 beci@health.ny.gov

* Note: Notifications are subject to change and will be updated as necessary.

2.0 SUMMARY OF PREVIOUS INVESTIGATION & REMEDIAL ACTIONS

2.1 Site Location and Description

The site is located in the County of Erie, Buffalo, New York and is comprised of 11 adjoining parcels, totaling approximately 4.85 acres, identified as:

- 300 Ohio Street, SBL 122.10-2-14
- 326 Ohio Street, SBL 122.10-2-13
- 328 Ohio Street, SBL 122.10-2-12
- 340 Ohio Street, SBL 122.10-2-11
- 354 Ohio Street, SBL 122.10-2-10
- 11 Chicago Street, SBL 122.10-2-15
- 71 Chicago Street, SBL 122.10-2-17
- 73 Chicago Street, SBL 122.10-2-18
- 75 Chicago Street, SBL 122.10-2-16.2
- 49 Mackinaw Street, SBL 122.10-2-19
- 53 Mackinaw Street, SBL 122.10-2-20

The Site is bounded by Mackinaw Street to the north, Ohio Street to the south, City of Buffalo – Conway Park to the east and Chicago Street to the west. The Buffalo River is located approximately 250-feet to the west of the Site (see Figures 1 and 2). The boundaries of the site are more fully described in Appendix A – Environmental Easement.

2.2 Physical Setting

2.2.1 Land Use

The 300 Ohio Street Site is located in a highly developed mixed use former industrial, commercial, residential, and recreational area of the City of Buffalo, Erie County, New York. The site is currently vacant, covered by asphalt, soil and gravel areas. The Site is currently zoned M1 (Commercial-Light Industrial), but according to the recently approved Buffalo

Green Code Unified Development Ordinance, the Site is located within the boundaries of a transition to Urban Neighborhood (N-3O, N-3R, which identifies mixed use for residential and commercial land use. The properties adjoining the Site and in the neighborhood surrounding the Site primarily include mixed use commercial, residential, recreational and vacant properties (see Figure 2).

2.2.2 Geology

The U.S. Department of Agriculture Soil Conservation Service soil survey map of Erie County describes the general soil type at the Site as Urban Land (Ud) with 0-3 percent slopes. This is indicative of the level to gently sloping land with at least 40 percent of the soil surface covered by asphalt, concrete, buildings, or other impervious structures typical of an urban environment.

The geology at the Site was investigated during the RI and is generally described as non-native fill material generally present at varying thicknesses. Bore hole logs are provided in Appendix D.

Based on the bedrock geologic map of Erie County, the Site is situated over the Onondaga Formation of the Middle Devonian Series. The Onondaga Formation is comprised of varying texture from course to very finely crystalline with a dark gray to tan color and chert and fossils within. The unit has an approximate thickness of 110 to 160 feet. Structurally, the bedrock formation strike in an east-west direction and exhibit a regional dip that approximates 40 feet per mile (3 to 5 degrees) toward the south and southwest. Bedrock was not encountered during the RI.

2.2.3 Hydrogeology

Based on the findings of the RI, localized groundwater flow was estimated to flow in a westerly direction toward the Buffalo River. Groundwater from the underlying lean clay was typically encountered between 10 and 12 fbgs.

A groundwater isopotential map, including groundwater elevation data, is shown in Figure 3. Monitoring well construction logs are provided in Appendix D.

2.3 Investigation History

The following narrative provides a remedial history timeline and a brief summary of the available project records to document key investigative and remedial milestones for the Site. Full titles for each of the reports referenced below are provided in Section 8.0 - References.

2.3.1 May 2010 Limited Phase II Site Assessment & September 2010 Supplemental Phase II Site Assessment

LCS Inc. (LCS) conducted a limited site investigation at the former Petroleum Sales and Service filling station portion of the Site (i.e., 300-354 Ohio Street). The findings of that report included the following:

- A total of 66 soil borings were completed on-Site. Visual and olfactory evidence of impacted soil/fill was noted in multiple soil boring locations across the Site. Elevated PID readings were noted in 280 out of the 301 soil sample locations, with readings as high as 1,897 ppm being detected.
- Petroleum-related VOCs and SVOCs were detected at multiple soil boring locations across the site exceeding NYSDEC Part 375 Commercial and/or Industrial soil cleanup objectives (SCOs).

2.3.2 October 2010 Geophysical Survey Results, 300 Ohio Street, Buffalo, NY

AMEC Geomatrix, Inc. completed a geophysical investigation at the 300 Ohio Street Site utilizing an EM61. Geophysical surveys are utilized in an attempt to investigate and characterize subsurface anomalies. The findings of the report noted 19 anomalies, noted A-S, were detected, and described as potential USTs.

2.3.3 BCP Remedial Investigation/Alternatives Analysis Report (RI/AAR) (RI)

A RI was completed at the Site in accordance with the approved RI-AA Work Plan (May 2014). The purpose of the investigation was to more fully characterize the nature and extent of contamination on the BCP Site, in accordance with the BCP requirements. The RI included the advancement of test pits and soil borings, and installation of groundwater

monitoring wells to assess soil and groundwater at greater depths than previous investigations, and the collection of soil and groundwater samples.

Based on the results of the previous investigations and the RI, it was determined that remediation of the Site was necessary. A RI/AAR (was prepared to provide a summary of the investigations, and complete and assessment of remedial alternatives capable of achieving the Remedial Action Objectives (RAOs) for the Site. Details of the environmental conditions and RAOs are provided below.

2.3.4 Summary of Environmental Conditions

Based on the Remedial Investigation and historic investigations, the following environmental conditions exist at the Site:

Summary of RI Findings by Media

Surface Soil

- VOCs were not detected above Unrestricted Use SCOs (USCOs) in surface soil samples.
- Certain PAHs were detected at concentrations exceeding Commercial Use SCOs (CSCOs), at SS-4, SS-7, SS-8, SS-9, and SS-10. Concentrations of PAHs slightly above USCOs were also detected in SS-3, SS-5, and SS-6.
- Metals concentration exceeding CSCOs were detected in SS-10 for arsenic, barium, and lead; SS-9 for manganese; and SS-3 for cadmium.
- Pesticides, herbicides, and PCBs were not detected in surface soils above CSCOs.

Subsurface Soil

- Grossly Contaminated Petroleum Soil (GCPS) was evident during the previous investigation and RI. GCPS was identified in the central area of the Site associated with the UST system.
- VOCs were not detected above CSCOs outside of the GCPS area. Certain VOCs were detected above USCOs, in TP-5, TP-7, TP-9, TP-13, and TP-18.
- Certain PAHs were detected above CSCOs at TP-4, TP-13, MW-1, MW-2, MW-3, MW-4, and MW-6. No additional sample locations exceeded USCOs.

- Metals concentrations above CSCOs, specifically arsenic, barium and copper were only detected in TP-13, and TP-19 (arsenic only).
- Pesticides, herbicides, and PCBs were not detected above USCOs.

Groundwater

- One VOC, benzene, was detected above GWQS/GVs in MW-2, MW-3, and MW-5; however, benzene only slightly exceeded its GWQS of 1 ug/L in MW-2 and MW-5 (1.1 ug/L and 2.3 ug/L, respectively). No free-product was noted during groundwater sampling. In all cases, total VOCs were well below 1 mg/L.
- Four (4) PAHs (benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and chrysene exceeded their respective GWQSs.
- Pesticides, herbicides, and PCBs were not detected in groundwater above GWQS/GVs.

2.4 Remedial History

Based on the findings of the RI-AAR, as described above, remedial activities were completed in accordance with the Department approved Remedial Action Work Plan (rev July 2014) and preliminary remedial letter detailing initial excavation along the Ohio Street property boundary, dated May 2014. Details of the completed remedial activities are presented below, and more fully documented in the Final Engineering Report (FER).

2.4.1 UST System Removal

After completion of the demolition of the three (3) on-Site buildings, the former UST system, including USTs, fuel dispensers and appurtenant lines were uncovered, cleaned of residual contents, removed from the subsurface, and transported offsite for recycling as scrap. A NYSDEC Petroleum Bulk Storage closure form was completed to register closed previously registered tanks, as well as identify the additional unregistered tanks that were uncovered.

In total, 16 USTs and associated fuel pump islands and lines were removed. Figure 4 identifies the removed tanks, fuel dispensers and lines, and the additional exploratory test pits to assess historic municipal records that identified suspect tank locations. No additional tanks were discovered.

Green Environmental Services (GES) mobilized a vacuum truck to the Site and vacuumed out residual contents from the USTs and lines. Vacuumed residuals were transferred to an on-site settling tank where the residuals were decanted. Liquids were run through an on-site activated carbon treatment system and discharged into the Buffalo public sewer system (Permit No. 14-09-TP222). Solids from the settling tanks and the grossly contaminated petroleum soil (GCPS) from the remedial excavation were combined and transported off-site for disposal at Chaffee Landfill, located in Chaffee New York.

2.4.2 GCPS AOCs

In June 2014, excavation activities were completed along the BCP Ohio Street property boundary to address potential off-site migration related to petroleum impacts detected during off-site utility and road work. Remedial activities included the excavation and on-Site stockpiling of petroleum contaminated soil-fill, and the backfilling of the property boundary trench excavation with DEC-approved soil (clay). Post-excavation samples were collected along the property boundary with Ohio Street prior to backfilling the excavation. The stockpiled GCPS was loaded and disposed off-site during the remedial excavation, as described below.

Between August and October 2014, 18,650 tons of GCPS was excavated and transported off-site for disposal at Waste Management's Chaffee Landfill, located in Chaffee New York. A total of 54 post-excavation confirmatory sidewall and floor soil samples were collected from the UST-GCPS area (see Table 3 and Figure 5). Post-excavation analytical results were below CSCOs.

2.4.3 MW-1 Excavation Area

In June 2014, 258 tons of GCPS in the vicinity of MW-1 was excavated and transported off-site for disposal at WM Chaffee Landfill. After completion of the excavation, post-excavation samples were collected (see Table 4 and Figure 5). Post-excavation analytical results were below CSCOs.

2.4.4 TP-13 Excavation Area

On October 13, 2014, approximately 387 tons of non-hazardous metals contaminated soil-fill was excavated from the vicinity of TP-13 and transported offsite for disposal at WM Chaffee Landfill. Post-excavation sidewall and floor samples were collected (see Figure 5 and Table 5). Post-excavation analytical results were below CSCOs.

2.4.5 SS-10 Excavation Area

In October 2016, 770 tons of shallow non-hazardous metal contaminated soil/fill in the vicinity of SS-10 was excavated and transported offsite for disposal at WM's Chaffee Landfill. It should be noted that the excavation was completed to the property boundary along the northern (Mackinaw Street) and southern limits; and, that the excavation was limited to the west by the presence of a large tree that is to remain and municipal utilities beyond. Post-excavation samples were collected from the sidewall and floor (see Table 6 and Figure 6). On-Site post-excavation analytical results were below CSCOs, with the exception of WW-1r.

2.5 Remedial Action Objectives

The development of an appropriate remedial approach begins with definition of site-specific Remedial Action Objectives (RAOs) to address substantial public health and significant environmental issues identified during remedial investigations. In developing the RAOs, consideration is given to the reasonably anticipated future use of the Property (i.e., commercial) and the applicable SCGs.

The Remedial Action Objectives (RAOs) for the Site as listed in the Decision Document dated March 2014 are as follows:

2.5.1 Soil:

RAOs for Public Health Protection

- Prevent ingestion/direct contact with contaminated soil.

RAOs for Environmental Protection

- Prevent migration of contaminants that would result in groundwater or surface water contamination.

2.5.2 Groundwater:

RAOs for Public Health Protection

- Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.

RAOs for Environmental Protection

- Remove the source of ground or surface water contamination.

2.5.3 Soil Vapor:

RAOs for Public Health Protection

- Mitigate impacts to public health resulting from existing, or potential for, soil vapor intrusion into buildings at a site.

2.6 Remaining Contamination

The 300 Ohio Street Site was remediated to address metals, PAH, and grossly contaminated petroleum soil-fill (GCPS), to achieve a Track 4 Commercial Use Cleanup, which is consistent with the intended use of the Site.

Residual contamination remaining at the Site includes soil/fill located beneath the cover system site wide, though potential exposure is mitigated due to the depth of the contaminant, completion of the remedial activities, and placement of a Site cover system, including existing asphalt covered areas, and vegetated soil cover areas.

2.6.1 Soil

Residual contamination remaining on-Site soil/fill above USCOs, includes VOCs, SVOCs, metals, PCBs, pesticides and herbicides located beneath the NYSDEC approved cover system, including demarcation layer and 12-inches minimum of approved cover material in accordance with 6NYCRR Part 375 requirements. Tables 3 -7 summarize the remaining on-Site soil/fill sample locations with constituents above USCOs, and Figure 7 identifies the

sample locations. Constituents above regulatory guidelines are located site-wide beneath the cover system, though potential exposure to the remaining contamination is mitigated due to the depth of the remaining contamination after the completion of the remedial excavation, and depth to on-Site groundwater, and the placement of a cover system.

2.6.2 Groundwater

No post remedial action groundwater sampling was conducted on-Site. RI results identified one (1) VOC (benzene), four (4) SVOCs (benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and chrysene, five (5) dissolved metals (antimony, iron, magnesium, manganese, and sodium) were detected above GWQS (see Table 2). All wells with elevated benzene were located within the remedial excavation, whereby residual contamination is expected to degrade natural based on the extent of remedial excavation that removed the source of potential future groundwater contamination. Post-excavation soil results clearly indicate that petroleum source material has been removed. Remaining elevated metals above GWQS are primarily limited to naturally occurring minerals. Depth to overburden water ranges from 5 to 12 fbgs. Due to the depth of contamination and the placement of a cover system, the potential exposure to the remaining groundwater contamination is unlikely.

3.0 INSTITUTIONAL & ENGINEERING CONTROL PLAN

3.1 General

Since remaining contamination exists at the site, Institutional Controls (ICs) and Engineering Controls (ECs) are required to protect human health and the environment. This IC/EC Plan describes the procedures for the implementation and management of all IC/ECs at the site. The IC/EC Plan is one component of the SMP and is subject to revision by the NYSDEC.

This plan provides:

- A description of all IC/ECs on the site;
- The basic implementation and intended role of each IC/EC;
- A description of the key components of the ICs set forth in the Environmental Easement;
- A description of the controls to be evaluated during each required inspection and periodic review;
- A description of plans and procedures to be followed for implementation of IC/ECs, such as the implementation of the Excavation Work Plan (EWP) (as provided in Appendix B) for the proper handling of remaining contamination that may be disturbed during maintenance or redevelopment work on the site; and
- Any other provisions necessary to identify or establish methods for implementing the IC/ECs required by the site remedy, as determined by the NYSDEC.

3.2 Institutional Controls

A series of ICs is required by the Decision Document to: (1) maintain and monitor the Site; (2) prevent future exposure to remaining contamination; and, (3) limit the use and development of the site to commercial and industrial uses only. Adherence to these ICs on the site is required by the Environmental Easement and will be implemented under this SMP. ICs identified in the Environmental Easement may not be discontinued without an amendment to or extinguishment of the Environmental Easement. The ICs are:

- The property may be used for: commercial and or industrial use;
- All ECs must be maintained as specified in this SMP;

- All ECs must be inspected at a frequency and in a manner defined in the SMP.
- The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or the Erie County DOH;
- Data and information pertinent to site management must be reported at the frequency and in a manner as defined in this SMP;
- All future activities that will disturb remaining contaminated material must be conducted in accordance with this SMP;
- Monitoring to assess the performance and effectiveness of the remedy must be performed as defined in this SMP;
- Monitoring, inspection, and reporting of any mechanical or physical component of the remedy shall be performed as defined in this SMP;
- Access to the site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the Environmental Easement.
- The potential for vapor intrusion will be evaluated for any future building(s) developed on-Site. A work plan, including SVI, will be provided to the Departments for review, in accordance with the EWP.
- Residential Use of the Site is prohibited.
- Vegetable gardens and farming on the site are prohibited.

3.3 Engineering Controls

3.3.1 Cover System

Exposure to remaining contamination at the 300 Ohio Street Site is prevented by the construction of a cover system. This cover system is comprised of a minimum of 12-inches of clean DEC approved soil/stone material placed above a demarcation layer. Figure 8 presents the cover system layout and applicable cover system details.

The Excavation Work Plan (EWP) provided in Appendix B outlines the procedures required to be implemented in the event the cover system is breached, penetrated, or temporarily removed, and any underlying remaining contamination is disturbed. Procedures for the inspection of this cover are provided in the Monitoring and Sampling Plan included in Section 4.0 of this SMP. Any work conducted pursuant to the EWP must also be conducted

in accordance with the procedures defined in a Health and Safety Plan (HASP) and associated Community Air Monitoring Plan (CAMP) prepared for the site and provided in Appendix E.

3.3.2 Criteria for Completion of Remediation/Termination of Remedial Systems

Generally, remedial processes are considered completed when monitoring indicates that the remedy has achieved the remedial action objectives identified by the decision document. The framework for determining when remedial processes are complete is provided in Section 6.4 of NYSDEC DER-10.

Cover System

The cover system is a permanent control and the quality and integrity of this system will be inspected at defined, regular intervals in accordance with this SMP in perpetuity, or a modified frequency and duration as approved by the Department.

4.0 MONITORING AND SAMPLING PLAN

4.1 General

This Monitoring and Sampling Plan describes the measures for evaluating the overall performance and effectiveness of the remedy. This Monitoring and Sampling Plan may only be revised with the approval of the NYSDEC.

This Monitoring Plan describes the methods to be used for:

- Monitoring the performance and effectiveness of the site cover;
- A schedule of monitoring and frequency of submittals to the Department.
- Assessing compliance with applicable NYSDEC standards, criteria and guidance (SCGs), and
- Evaluating site information periodically to confirm that the remedy continues to be effective in protecting public health and the environment;

To adequately address these issues, this Monitoring and Sampling Plan provides information on:

- Annual inspection and periodic certification.

Reporting requirements are provided in Section 7.0 of this SMP.

4.2 Site-Wide Inspection

Site-wide inspections will be performed at a minimum of once per year (annually), or at a lesser frequency as approved by the Department. Modification to the frequency or duration of the inspections will require approval from the NYSDEC. Cover system inspections will also be performed after all severe weather conditions that may affect ECs. During these inspections, an inspection form will be completed as provided in Appendix F – Site Management Forms. The form will compile sufficient information to assess the following:

- Compliance with all ICs, including site usage;
- An evaluation of the condition and continued effectiveness of ECs;
- General site conditions at the time of the inspection;

- The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection; and
- Confirm that site records are up to date.

Inspections of all remedial components installed at the site will be conducted. A comprehensive site-wide inspection will be conducted and documented according to the SMP schedule, regardless of the frequency of the Periodic Review Report. The inspections will determine and document the following:

- Whether ECs continue to perform as designed;
- If these controls continue to be protective of human health and the environment;
- Compliance with requirements of this SMP and the Environmental Easement;
- Achievement of remedial performance criteria; and
- If site records are complete and up to date; and

Reporting requirements are outlined in Section 7.0 of this plan.

Inspections will also be performed in the event of an emergency. If an emergency, such as a natural disaster or an unforeseen failure of any of the ECs occurs that reduces or has the potential to reduce the effectiveness of ECs in place at the site, verbal notice to the NYSDEC must be given by noon of the following day. In addition, an inspection of the site will be conducted within 5 days of the event to verify the effectiveness of the IC/ECs implemented at the site by a qualified environmental professional, as determined by the NYSDEC. Written confirmation must be provided to the NYSDEC within 7 days of the event that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public.

5.0 OPERATION & MAINTENANCE PLAN

The site remedy does not rely on any mechanical systems to protect public health and the environment. Therefore, the operation and maintenance of such components is not included in this SMP.

6.0 PERIODIC ASSESSMENTS/EVALUATIONS

6.1 Climate Change Vulnerability Assessment

Increases in both the severity and frequency of storms/weather events, an increase in sea level elevations along with accompanying flooding impacts, shifting precipitation patterns and wide temperature fluctuation, resulting from global climactic change and instability, have the potential to significantly impact the performance, effectiveness and protectiveness of a given site and associated remedial systems. Vulnerability assessments provide information so that the site and associated remedial systems are prepared for the impacts of the increasing frequency and intensity of severe storms/weather events and associated flooding.

The subject site is considered to have low vulnerability related to climatic conditions. There are no State or Federal wetlands or floodplains located on the Site. The site will not employ any remedial systems reliant upon electrical power; the site is serviced by municipal sewer system (storm and sanitary). As such, acute cover system erosion to a depth greater than 12-inches, and the resultant potential exposure to remaining contamination, is highly unlikely.

6.2 Green Remediation Evaluation

NYSDEC's DER-31 Green Remediation requires that green remediation concepts and techniques be considered during all stages of the remedial program including site management, with the goal of improving the sustainability of the cleanup and summarizing the net environmental benefit of any implemented green technology. This section of the SMP provides a summary of any green remediation evaluations to be completed for the site during site management, and as reported in the Periodic Review Report (PRR).

No mechanical engineering systems are included in the SMP. The only engineering control established for the Site is the cover system. The maintenance of cover system is not anticipated to generate additional waste, use energy, produce emissions, require substantial water to promote vegetative cover growth, and/or affect any ecosystem (Site is located in a highly developed urban area in the City of Buffalo).

6.3 Remedial System Optimization

A Remedial Site Optimization (RSO) study will not be required as there are not active remedial systems. The only engineering control at the Site is the cover system.

7.0 REPORTING REQUIREMENTS

7.1 Site Management Reports

All site management inspection, maintenance, and monitoring events will be recorded on the appropriate site management forms provided in Appendix F. These forms are subject to NYSDEC revision.

All applicable inspection forms and other records, including media sampling data and system maintenance reports, generated for the site during the reporting period will be provided in electronic format to the NYSDEC in accordance with the requirements of Table 8 and summarized in the Periodic Review Report.

Table 8: Schedule of Interim Monitoring/Inspection Reports

Task/Report	Reporting Frequency*
Cover System Inspection	Annually
Periodic Review Report	Triennially, after the submittal of the initial PRR.

* The frequency of events will be conducted as specified until otherwise approved by the NYSDEC.

All interim monitoring/inspections reports will include, at a minimum:

- Date of event or reporting period;
- Name, company, and position of person(s) conducting monitoring/inspection activities;
- Description of the activities performed;
- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents noted (included either on the checklist/form or on an attached sheet);
- Type of samples collected (e.g., sub-slab vapor, indoor air, outdoor air, etc.);
- Copies of all field forms completed (e.g., well sampling logs, chain-of-custody documentation, etc.);

- Sampling results in comparison to appropriate standards/criteria;
- A figure illustrating sample type and sampling locations;
- Copies of all laboratory data sheets and the required laboratory data deliverables required for all points sampled (to be submitted electronically in the NYSDEC-identified format);
- Any observations, conclusions, or recommendations; and
- A determination as to whether contaminant conditions have changed since the last reporting event.

Routine maintenance event reporting forms will include, at a minimum:

- Date of event;
- Name, company, and position of person(s) conducting maintenance activities;
- Description of maintenance activities performed;
- Any modifications to the system;
- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents noted (included either on the checklist/form or on an attached sheet); and,
- Other documentation such as copies of invoices for maintenance work, receipts for replacement equipment, etc., (attached to the checklist/form).

Non-routine maintenance event reporting forms will include, at a minimum:

- Date of event;
- Name, company, and position of person(s) conducting non-routine maintenance/repair activities;
- Description of non-routine activities performed;
- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents (included either on the form or on an attached sheet); and
- Other documentation such as copies of invoices for repair work, receipts for replacement equipment, etc. (attached to the checklist/form).

Data will be reported in digital format as determined by the NYSDEC. Currently, data is to be supplied electronically and submitted to the NYSDEC EQuIS™ database in accordance with the requirements found at this link <http://www.dec.ny.gov/chemical/62440.html>.

7.2 Periodic Review Report

A Periodic Review Report (PRR) will be submitted to the Department beginning approximately sixteen (16) months after the Certificate of Completion is issued, anticipated to be due no earlier than June 2018. After submittal of the initial Periodic Review Report, the next PRR shall be submitted triennially (every third year) to the Department or at another frequency as may be required by the Department. In the event that the site is subdivided into separate parcels with different ownership, a single Periodic Review Report will be prepared that addresses the site described in Appendix A -Environmental Easement. The report will be prepared in accordance with NYSDEC's DER-10 and submitted within 30 days of the end of each certification period. Media sampling results will also be incorporated into the Periodic Review Report. The report will include:

- Identification, assessment, and certification of all ECs/ICs required by the remedy for the site.
- Results of the required annual site inspections and severe condition inspections, if applicable.
- All applicable site management forms and other records generated for the site during the reporting period in the NYSDEC-approved electronic format, if not previously submitted.
- Results of all analyses, copies of all laboratory data sheets, and the required laboratory data deliverables for all samples collected during the reporting period will be submitted in digital format as determined by the NYSDEC. Currently, data is supplied electronically and submitted to the NYSDEC EQuIS™ database in accordance with the requirements found at this link: <http://www.dec.ny.gov/chemical/62440.html>.
- A site evaluation, which includes the following:
 - The compliance of the remedy with the requirements of the site-specific RAWP, ROD or Decision Document;

- The operation and the effectiveness of all treatment units, etc., including identification of any needed repairs or modifications;
- Any new conclusions or observations regarding site contamination based on inspections or data generated by the Monitoring and Sampling Plan for the media being monitored;
- Recommendations regarding any necessary changes to the remedy and/or Monitoring and Sampling Plan; and
- Trends in contaminant levels in the affected media will be evaluated to determine if the remedy continues to be effective in achieving remedial goals as specified by the Decision Document.
- The overall performance and effectiveness of the remedy.

7.2.1 Certification of Institutional and Engineering Controls

Following the last inspection of the reporting period, a qualified environmental professional will prepare, and include in the Periodic Review Report, the following certification as per the requirements of NYSDEC DER-10:

“For each institutional or engineering control identified for the site, I certify that all of the following statements are true:

- *The inspection of the site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under my direction;*
- *The institutional control and/or engineering control employed at this site is unchanged from the date the control was put in place, or last approved by the Department;*
- *Nothing has occurred that would impair the ability of the control to protect the public health and environment;*
- *Nothing has occurred that would constitute a violation or failure to comply with any site management plan for this control;*
- *Access to the site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of this control;*
- *If a financial assurance mechanism is required under the oversight document for the site, the mechanism remains valid and sufficient for the intended purpose under the document;*
- *Use of the site is compliant with the environmental easement;*

- *The engineering control systems are performing as designed and are effective;*
- *To the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program; and*
- *The information presented in this report is accurate and complete.*

I certify that all information and statements in this certification form are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law. I, [name], of [business address], am certifying as [Owner/ Remedial Party or Owner's/ Remedial Party's Designated Site Representative] for the site."

In addition, every five years the following certification will be added:

- *The assumptions made in the qualitative exposure assessment remain valid.*

The signed certification will be included in the Periodic Review Report.

The Periodic Review Report will be submitted, in electronic format, to the NYSDEC Central Office, Regional Office in which the site is located, and the NYSDOH Bureau of Environmental Exposure Investigation. The Periodic Review Report may need to be submitted in hard-copy format, as requested by the NYSDEC project manager.

7.3 Corrective Measures Work Plan

If any component of the remedy is found to have failed, or if the periodic certification cannot be provided due to the failure of an institutional or engineering control, a Corrective Measures Work Plan will be submitted to the NYSDEC for approval. This plan will explain the failure and provide the details and schedule for performing work necessary to correct the failure. Unless an emergency condition exists, no work will be performed pursuant to the Corrective Measures Work Plan until it has been approved by the NYSDEC.

8.0 REFERENCES

1. 6NYCRR Part 375, Environmental Remediation Programs. December 14, 2006.
2. New York State Department of Environmental Conservation. *DER-10 - Technical Guidance for Site Investigation and Remediation*, dated May 2010.
3. New York State Department of Environmental Conservation. *Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1*. June 1998 (April 2000 addendum).
4. TurnKey Environmental Restoration, LLC. Remedial Investigation Work Plan, 300 Ohio Street Site (C915257), Buffalo, New York. Revised May 2012.
5. Benchmark Environmental Engineering & Science, PLLC, in association with TurnKey Environmental Restoration, LLC, Remedial Investigation/Alternative Analysis Report (RI/AAR) Report, 300 Ohio Street Site, Buffalo, NY, BCP Site No. C915257, prepared for 4216 Group, LLC. Revised November 2013.
6. Benchmark Environmental Engineering & Science, PLLC, in association with TurnKey Environmental Restoration, LLC, Remedial Action Work Plan, 300 Ohio Street Site, Buffalo, NY, BCP Site No. C915257, prepared for 4216 Group, LLC. Revised July 2014.

TABLES

TABLE 2

SUMMARY OF REMEDIAL INVESTIGATION GROUNDWATER ANALYTICAL DATA

300 OHIO STREET SITE

BUFFALO, NEW YORK

Parameters ¹	Class GA GWQS ²	Sample Location					
		MW-1	MW-2	MW-3	MW-4	MW-5	MW-6
		7/25/12					
Volatile Organic Compounds (VOCs) - ug/L							
1,2,4,5-Tetramethylbenzene	--	ND	ND	2.6 J	ND	36	ND
1,2,4-Trimethylbenzene	5	ND	ND	ND	ND	0.97 J	ND
1,4-Diethylbenzene	--	ND	ND	ND	ND	6.8	ND
4-Ethyltoluene	--	ND	ND	ND	ND	1.7 J	ND
Acetone	50	ND	ND	5.1 J	6	16	24
Benzene	1	ND	1.1	160	ND	2.3	0.34 J
Chloroform	7	ND	ND	ND	ND	3.4	ND
Isopropylbenzene	5	ND	ND	ND	ND	2.5	ND
Methyl tert butyl ether (MTBE)	--	ND	2.1 J	5.6 J	0.78 J	9.2	ND
n-Butylbenzene	5	ND	ND	ND	ND	3.1	ND
n-Propylbenzene	5	ND	ND	2.1 J	ND	3.6	ND
sec-Butylbenzene	5	ND	ND	ND	ND	1.6 J	ND
Toluene	5	ND	ND	ND	ND	1.1 J	ND
Xylene, Total	5	ND	ND	3.6 J	ND	4.4	ND
Semivolatile Organic Compounds (SVOCs) - ug/L							
2-Methylnaphthalene	--	ND	ND	2.3	0.91	2.9	ND
Acenaphthene	20	1.8	0.25	0.29	1.4	1.8	ND
Acenaphthylene	--	ND	ND	ND	0.29	ND	ND
Anthracene	--	0.07 J	ND	0.12 J	0.87	0.28	0.07 J
Benzo(a)anthracene	0.002	ND	ND	ND	0.48	ND	ND
Benzo(a)pyrene	ND	ND	ND	ND	0.52	ND	ND
Benzo(b)fluoranthene	0.002	ND	ND	ND	0.54	ND	ND
Benzo(ghi)perylene	--	ND	ND	ND	0.5	ND	ND
Benzo(k)fluoranthene	--	ND	ND	ND	0.31	ND	ND
Benzoic acid	--	ND	R	ND	ND	ND	5.1 J
Chrysene	0.002	ND	ND	ND	0.41	ND	ND
Carbazole	--	ND	ND	ND	2	ND	ND
Dibenzo(a,h)anthracene	--	ND	ND	ND	0.36	ND	ND
Dibenzofuran	--	ND	ND	ND	1.2 J	ND	ND
Fluoranthene	50	0.11 J	ND	0.09 J	1.7	0.14 J	0.1 J
Fluorene	50	ND	ND	0.41	1.9	1.2	0.15 J
Indeno(1,2,3-cd)pyrene	--	ND	ND	ND	0.56	ND	ND
Naphthalene	10	ND	ND	ND	4.3	ND	ND
Phenanthrene	50	ND	0.1 J	0.8	4.6	2.3	1.2
Pyrene	50	0.07 J	ND	0.08 J	1.2	0.09 J	0.07 J
Dissolved Metals - ug/L ³							
Aluminum	--	--	4 J	170 J	--	--	6 J
Antimony	3	--	1.6 J	9.9 J	--	--	7.1 J
Arsenic	50	--	3.1 J	4.8 J	--	--	3.8 J
Barium	1000	--	69.5 J	331.5 J	--	--	127.8 J
Cadmium	10	--	ND	ND	--	--	0.1 J
Calcium	--	--	104000	147000 J	--	--	171000 J
Chromium	100	--	0.3 J	0.4 J	--	--	0.6 J
Cobalt	--	--	0.3 J	3.3 J	--	--	3.3 J
Copper	400	--	3.2 J	0.9 J	--	--	1 J
Iron	300	--	352 J	4670 J	--	--	4700 J
Lead	50	--	ND	0.5 J	--	--	ND
Magnesium	35000	--	19900 J	47800 J	--	--	42800 J
Manganese	300	--	489.6 J	2228 J	--	--	1662 J
Nickel	100	--	0.5 J	5.8 J	--	--	5.6 J
Potassium	--	--	10600 J	39700 J	--	--	25.5 J
Selenium	10	--	ND	1 J	--	--	0.4 J
Sodium	20000	--	81000 J	139 J	--	--	80600 J
Thallium	--	--	ND	ND	--	--	0.03 J
Vanadium	--	--	0.4 J	0.7 J	--	--	0.3 J
Zinc	2000	--	4.8 J	5.2 J	--	--	8.3 J

Notes:

- Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.
- Values per NYSDEC TOGS 1.1.1 Class GA Groundwater Quality Standards.
- Sample results were reported by the laboratory in mg/L and converted to ug/L for comparisons to GWQS
- Samples MW-2, MW-3, and MW-6 was also analysed for Polychlorinated Biphenyls (PCBs), pesticides, and herbicides; all reported as non-detect.

Qualifiers:

ND = Parameter not detected above laboratory detection limit.
 "--" = Sample not analyzed for parameter or no GWQS available for the parameter.
 J = Estimated Value - Below calibration range

BOLD = Result exceeds GWQS.

TABLE 3
SUMMARY OF GCPS POST-EXCAVATION SOIL ANALYTICAL RESULTS



300 OHIO STREET SITE
BUFFALO, NEW YORK

PARAMETER ¹	Commercial Use SCOs ²	SAMPLE LOCATION																			
		INTERIM EXCAVATION									REMEDIAL EXCAVATION										
		SW-1 ⁴	SW-2 ⁴	SW-3 ⁴	SW-4 ⁴	SW-5 ⁴	SW-6 ⁴	SW-7 ⁴	SW-8 ⁴	SW-9 ⁴	BOTTOM 1	BOTTOM 2	BOTTOM 3	BOTTOM 4	BOTTOM 5	BOTTOM 6	BOTTOM 7	BOTTOM 8	BOTTOM 9	BOTTOM 10	BOTTOM 11
		06/05/2014			06/09/2014			06/10/2014			08/21/2014		08/26/2014		08/28/2014				09/02/2014		
Volatile Organic Compounds (VOCs) - mg/Kg ³																					
1,2,4-Trimethylbenzene	190	ND	ND	16	1.3	0.83	0.0003 J	0.46	0.0024 J	ND	ND	ND	ND	0.00078 J	ND	ND	0.00087 J	ND	ND	ND	0.08
1,3,5-Trimethylbenzene	190	ND	ND	5.8	1.1	0.31 J	0.00041 J	0.12 J	0.00067 J	ND	ND	ND	ND	0.00037 J	ND	0.0003 J	0.00037 J	ND	ND	ND	0.013 J
2-Butanone (MEK)	500	ND	ND	ND	ND	ND	ND	ND	0.0079 J	0.0097 J	ND	0.0086 J	0.024	0.0075 J	ND	0.0075 J	0.046	0.0072 J	ND	0.01 J	0.045 J
Acetone	500	0.046	0.045	0.39 J	ND	ND	ND	0.43 J	0.057	0.065	0.02	0.083	0.17	0.048	0.032	0.06	0.34	0.032	0.0034 J	0.071	0.25
Benzene	44	ND	ND	0.41	0.64	2.4	ND	1.1	0.0012	ND	ND	ND	0.22	0.0054	ND	ND	0.89 D	0.00034 J	ND	0.0045	0.12
Bromomethane (Methyl bromide)	--	ND	ND	0.042 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cyclohexane	--	ND	ND	1.1 J	2 J	2	ND	0.44 J	0.00061 J	ND	ND	ND	0.00027 J	0.0023 J	ND	0.0057 J	ND	0.029	ND	0.003 J	0.015 J
Ethylbenzene	390	ND	ND	0.41	0.59	3.2	ND	0.32	0.00026 J	ND	ND	ND	0.00087 J	ND	ND	ND	0.0041	ND	0.00051 J	0.0022 J	0.0045 J
Isopropylbenzene (Cumene)	--	ND	ND	0.16	0.16	2	ND	0.24	0.00039 J	ND	ND	ND	ND	ND	ND	ND	ND	0.033	ND	ND	0.0055 J
Methyl tert butyl ether (MTBE)	500	ND	ND	ND	ND	ND	0.0022 J	0.6	0.027	0.0027	ND	0.06	0.14	0.0024 J	ND	0.00055 J	0.19	ND	0.01	0.23	1.4
Methylcyclohexane	--	ND	ND	3.1	7.1	2.1	ND	1.3	ND	ND	ND	ND	ND	ND	0.0024 J	0.0053 J	ND	0.0055	ND	0.00047 J	0.026 J
Methylene chloride	500	0.0026 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
n-Butylbenzene	500	ND	ND	0.75	0.95	0.51	ND	0.17	0.00034 J	ND	ND	ND	ND	ND	0.00076 J	ND	ND	ND	ND	ND	ND
n-Propylbenzene	500	ND	ND	0.53	0.53	1.7	ND	0.37	0.00044 J	ND	ND	ND	ND	ND	ND	ND	ND	0.057	ND	ND	0.0095
p-Isopropyltoluene	--	ND	ND	0.27	0.1 J	0.038 J	ND	0.059 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.0015 J
sec-Butylbenzene	500	ND	ND	0.21	0.25	0.14	ND	0.075	ND	ND	ND	ND	ND	ND	0.00042 J	ND	ND	0.0005 J	ND	ND	ND
tert-Butylbenzene	500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Toluene	500	ND	ND	0.1 J	0.33	0.13	ND	0.046 J	ND	ND	ND	ND	0.0012 J	0.00028 J	0.00031 J	0.00037 J	0.0086	0.00058 J	0.00027 J	0.0025 J	0.0083 J
Total Xylenes	500	ND	ND	6	1.98	1.71	ND	0.465	0.00166 J	ND	ND	ND	0.00362 J	0.0004 J	ND	0.00049 J	0.0076 J	0.0015 J	ND	0.0108 J	0.0397 J
Semi-Volatile Organic Compounds (SVOCs) - mg/Kg ³																					
2-Methylnaphthalene	--	ND	ND	0.14 J	1.5	0.45	0.21 J	0.72	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Acenaphthene	500	ND	ND	ND	0.22	ND	0.061 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Acenaphthylene	500	ND	ND	ND	0.11 J	ND	0.11 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Anthracene	500	ND	0.035 J	ND	0.4	ND	0.26	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzo(a)anthracene	5.6	ND	0.12	ND	0.56	ND	0.84	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.087 J	ND	ND
Benzo(a)pyrene	1	ND	0.11 J	ND	0.46	ND	0.79	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.078 J	ND	ND
Benzo(b)fluoranthene	5.6	0.062 J	0.13	ND	0.58	ND	1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.092 J	ND	ND
Benzo(ghi)perylene	500	ND	0.071 J	ND	0.24	ND	0.46	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzo(k)fluoranthene	56	ND	0.053 J	ND	0.21	ND	0.44	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.042 J	ND	ND
Chrysene	56	0.042 J	0.13	ND	0.52	ND	0.8	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.078 J	ND	ND
Dibenzo(a,h)anthracene	0.56	ND	ND	ND	0.073 J	ND	0.13	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Fluoranthene	500	0.074 J	0.25	ND	1.3	0.066 J	1.8	ND	0.047 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.1 J	ND	ND
Fluorene	500	ND	ND	ND	0.37	ND	0.12 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Indeno(1,2,3-cd)pyrene	5.6	ND	0.064 J	ND	0.29	ND	0.56	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.043 J	ND	ND
Naphthalene	500	ND	ND	0.073 J	0.96	ND	ND	0.1 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Phenanthrene	500	0.042 J	0.15	ND	1.4	0.14	0.71	0.15	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Pyrene	500	0.064 J	0.24	ND	1.1	0.062 J	1.4	ND	0.045 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.093 J	ND	ND
Total PAHs	500	0.284 J	1.353 J	0.213 J	10.293 J	0.718 J	9.691 J	0.97 J	0.092 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.613 J	ND	ND

- Notes:
1. Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.
 2. Values per NYSDEC Part 375 Soil Cleanup Objectives (SCOs).
 3. Sample results were reported by the laboratory in ug/kg and converted to mg/kg for comparisons to SCOs.
 4. SW-1 through SW-9 were sampled during the interim excavation along the Ohio Street property boundary.
 5. BOTTOM 33 was labeled as "TANK C AREA" in the analytical report.

Definitions:
ND = Parameter not detected above laboratory detection limit.
"--" = No value available for the parameter. Or parameter not analysed for.
J = Estimated value; result is less than the sample quantitation limit but greater than zero.

Bold = Results exceed Part 375 Commercial Use SCOs

TABLE 3
SUMMARY OF GCPS POST-EXCAVATION SOIL ANALYTICAL RESULTS

300 OHIO STREET SITE
BUFFALO, NEW YORK



PARAMETER ¹	Commercial Use SCOs ²	SAMPLE LOCATION																			
		REMEDIAL EXCAVATION																			
		BOTTOM 12	BOTTOM 13	BOTTOM 14	BOTTOM 15	BOTTOM 16	BOTTOM 17	BOTTOM 18	BOTTOM 19	BOTTOM 20	BOTTOM 21	BOTTOM 22	BOTTOM 23	BOTTOM 24	BOTTOM 25	BOTTOM 26	BOTTOM 27	BOTTOM 28	BOTTOM 29	BOTTOM 30	BOTTOM 31
		09/02/2014		09/02/2014		09/08/2014						09/11/2014						09/17/2014			
Volatile Organic Compounds (VOCs) - mg/Kg ³																					
1,2,4-Trimethylbenzene	190	0.14	ND	ND	0.0038 J	ND	ND	0.16	0.11	0.0081	0.00032 J	ND	ND	0.0078	0.00084 J	ND	0.012	0.098	ND	ND	ND
1,3,5-Trimethylbenzene	190	0.051	ND	ND	0.0016 J	ND	ND	0.042	0.028	0.0042 J	ND	ND	ND	0.0038 J	0.00036 J	ND	0.0039 J	0.016	ND	ND	ND
2-Butanone (MEK)	500	ND	0.023 J	0.013 J	0.016 J	0.013 J	0.004 J	0.02	0.021	0.02	0.018	0.0021 J	0.0028 J	0.028	0.018	0.014	0.0092 J	0.11	ND	0.015	0.015
Acetone	500	0.19	0.16	0.12	0.12	0.16	0.071	0.12	0.13	0.11	0.12	0.024	0.029	0.18	0.16	0.14	0.067	0.32	0.029	0.052	0.13
Benzene	44	0.12	ND	ND	0.0029	0.00092 J	ND	0.016	0.0059	0.026	ND	ND	ND	ND	ND	ND	0.0006 J	0.037	ND	0.00066 J	0.00047 J
Bromomethane (Methyl bromide)	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cyclohexane	--	0.12 J	0.0032 J	0.0059 J	0.029 J	ND	ND	0.011 J	0.011 J	0.011 J	0.0064 J	ND	ND	0.0058 J	0.0012 J	ND	0.0029 J	0.057	ND	0.0058 J	ND
Ethylbenzene	390	0.084	ND	ND	0.0025 J	0.0019 J	ND	0.081	0.079	0.004	ND	ND	ND	ND	ND	ND	0.0088	0.11	ND	0.00049 J	ND
Isopropylbenzene (Cumene)	--	0.017	ND	ND	0.00059 J	ND	ND	0.0072	0.005	0.025	0.0068	ND	ND	0.0022	ND	ND	0.0011 J	0.011	ND	0.021	ND
Methyl tert butyl ether (MTBE)	500	0.53	0.26	0.3	0.29	ND	ND	0.075	0.11	0.031	0.048	ND	ND	0.00081 J	0.0003 J	0.00061 J	0.0052	0.0021 J	ND	0.00038 J	ND
Methylcyclohexane	--	0.18	0.0028 J	0.00089 J	0.012	ND	ND	0.015	0.011	0.03	0.024	ND	ND	0.044	0.0076	ND	0.0027 J	0.044	ND	0.047	ND
Methylene chloride	500	0.022 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.0031 J	ND	ND	0.0026 J	ND	ND	ND	ND
n-Butylbenzene	500	0.0068	ND	ND	ND	ND	ND	0.00078 J	0.00028 J	0.019	0.004	ND	ND	0.0004 J	ND	ND	0.00039 J	0.00029 J	ND	0.055	ND
n-Propylbenzene	500	0.054	ND	ND	0.00053 J	ND	ND	0.025	0.016	0.12	0.013	ND	ND	0.003	ND	ND	0.0028	0.031	ND	0.046	ND
p-Isopropyltoluene	--	0.0027 J	ND	ND	ND	ND	ND	0.0004 J	ND	0.00087 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
sec-Butylbenzene	500	0.0032 J	ND	ND	ND	ND	ND	0.00075 J	0.00038 J	0.011	0.0028	ND	ND	0.00094 J	ND	ND	0.00029 J	ND	ND	0.043	ND
tert-Butylbenzene	500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.0005 J	ND	ND	ND	ND	ND	ND	ND
Toluene	500	0.009 J	0.00082 J	0.00064 J	0.00087 J	ND	ND	0.0066	0.023	0.0012 J	ND	0.00054 J	0.00049 J	0.00054 J	0.00055 J	0.0004 J	0.00091 J	0.01	ND	ND	0.00026 J
Total Xylenes	500	0.142	0.0022 J	0.0038 J	0.02	0.00316 J	0.0012 J	0.514	0.57	0.00354 J	0.003 J	0.00048 J	ND	0.0037 J	0.0011 J	0.00074 J	0.0183	0.37	ND	0.00139 J	0.00027 J
Semi-Volatile Organic Compounds (SVOCs) - mg/Kg ³																					
2-Methylnaphthalene	--	ND	ND	ND	ND	ND	ND	ND	ND	0.23 J	0.1 J	0.12 J	ND	ND	ND	ND	ND	ND	0.12 J	0.86	ND
Acenaphthene	500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.049 J	ND
Acenaphthylene	500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Anthracene	500	0.037 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.063 J	0.035 J	ND
Benzo(a)anthracene	5.6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.29	0.082 J	ND
Benzo(a)pyrene	1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.51	0.078 J	ND
Benzo(b)fluoranthene	5.6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.76	0.099 J	ND
Benzo(ghi)perylene	500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.56	0.052 J	ND
Benzo(k)fluoranthene	56	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.26	ND	ND
Chrysene	56	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.42	0.075 J	ND
Dibenzo(a,h)anthracene	0.56	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.13	ND	ND
Fluoranthene	500	0.098 J	ND	ND	ND	ND	0.039 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.32	0.15	ND
Fluorene	500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.09 J	ND
Indeno(1,2,3-cd)pyrene	5.6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.56	0.058 J	ND
Naphthalene	500	ND	ND	ND	ND	ND	ND	ND	ND	0.14 J	ND	0.11 J	ND	ND	ND	ND	ND	ND	ND	ND	ND
Phenanthrene	500	0.1 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.17	0.22	ND
Pyrene	500	0.081 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.35	0.14	ND
Total PAHs	500	0.316 J	ND	ND	ND	ND	0.039 J	ND	ND	0.37 J	0.1 J	0.23 J	ND	ND	ND	ND	ND	ND	4.513 J	1.988 J	ND

- Notes:
1. Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.
 2. Values per NYSDEC Part 375 Soil Cleanup Objectives (SCOs).
 3. Sample results were reported by the laboratory in ug/kg and converted to mg/kg for comparisons to SCOs.
 4. SW-1 through SW-9 were sampled during the interim excavation along the Ohio Street property boundary.
 5. BOTTOM 33 was labeled as "TANK C AREA" in the analytical report.

Definitions:
ND = Parameter not detected above laboratory detection limit.
"--" = No value available for the parameter. Or parameter not analysed for.
J = Estimated value; result is less than the sample quantitation limit but greater than zero.

Bold = Results exceed Part 375 Commercial Use SCOs

TABLE 3
SUMMARY OF GCPS POST-EXCAVATION SOIL ANALYTICAL RESULTS

300 OHIO STREET SITE
BUFFALO, NEW YORK



PARAMETER ¹	Commercial Use SCOs ²	SAMPLE LOCATION													
		REMEDIAL EXCAVATION													
		BOTTOM 32	BOTTOM 33 ⁵	NORTHWALL 1	NORTHWALL 2	NORTHWALL 3	NORTHWALL 4	EASTWALL 1	EASTWALL 2	EASTWALL 3	EASTWALL 4	EASTWALL 5	WESTWALL 1	SOUTHWALL 1	SOUTHWALL 2
		09/17/2014	09/23/2014	09/17/2014				08/26/2014		09/02/2014	09/17/2014		08/21/2014		
Volatile Organic Compounds (VOCs) - mg/Kg ³															
1,2,4-Trimethylbenzene	190	ND	1.4	ND	ND	ND	ND	ND	ND	0.0073	ND	ND	ND	0.36	0.001 J
1,3,5-Trimethylbenzene	190	ND	0.31	ND	ND	ND	ND	ND	ND	0.0077	ND	ND	ND	0.1	0.00097 J
2-Butanone (MEK)	500	0.04	ND	ND	ND	0.0054 J	0.0071 J	0.014	0.0029 J	0.0092 J	ND	0.0047 J	ND	0.068	0.027
Acetone	500	0.22	0.2 J	0.011 J	0.024	0.07	0.062	0.064	0.024	0.025	ND	0.058	0.012 J	0.32	0.12
Benzene	44	ND	0.027 J	ND	0.00027 J	0.00031 J	0.00063 J	ND	ND	0.0021	0.00065 J	0.00039 J	ND	0.067	0.012
Bromomethane (Methyl bromide)	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cyclohexane	--	ND	0.22 J	ND	ND	ND	ND	ND	ND	0.0056 J	ND	ND	ND	0.021 J	0.0056 J
Ethylbenzene	390	ND	0.13	ND	ND	ND	ND	ND	ND	0.0024	ND	ND	ND	0.28	0.00046 J
Isopropylbenzene (Cumene)	--	ND	0.032 J	ND	ND	ND	ND	ND	ND	0.0033	ND	ND	ND	0.018	0.0031
Methyl tert butyl ether (MTBE)	500	ND	ND	ND	ND	ND	ND	ND	0.0003 J	0.0044	ND	ND	0.0038	ND	0.00087 J
Methylcyclohexane	--	0.0011 J	0.3	ND	ND	ND	ND	0.0068	ND	0.008	0.00068 J	ND	ND	0.018 J	0.0093
Methylene chloride	500	ND	ND	ND	ND	ND	ND	ND	ND	0.0083 J	ND	ND	ND	ND	ND
n-Butylbenzene	500	ND	0.22	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.011	0.0028
n-Propylbenzene	500	0.00039 J	0.14	ND	ND	ND	ND	ND	ND	0.0014	ND	ND	ND	0.052	0.014
p-Isopropyltoluene	--	ND	0.068	ND	ND	ND	ND	ND	ND	0.0006 J	ND	ND	ND	0.0024 J	ND
sec-Butylbenzene	500	ND	0.063	ND	ND	ND	ND	0.00045 J	ND	ND	ND	ND	ND	0.0037 J	0.0012
tert-Butylbenzene	500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Toluene	500	ND	0.062 J	ND	0.00028 J	ND	0.00034 J	ND	ND	0.0028	ND	ND	ND	0.021	0.001 J
Total Xylenes	500	ND	0.63	ND	0.00027 J	ND	0.00029 J	ND	ND	0.0177	ND	ND	ND	1.34	0.0048 J
Semi-Volatile Organic Compounds (SVOCs) - mg/Kg ³															
2-Methylnaphthalene	--	ND	1.4	ND	ND	ND	ND	ND	ND	1.2	0.46	ND	ND	ND	ND
Acenaphthene	500	ND	0.14 J	ND	ND	ND	ND	ND	ND	0.42	0.45	ND	ND	ND	ND
Acenaphthylene	500	ND	ND	ND	ND	ND	ND	ND	ND	0.37	0.28	ND	ND	ND	ND
Anthracene	500	ND	0.18	ND	ND	ND	ND	ND	ND	1.1	1.4	ND	ND	ND	ND
Benzo(a)anthracene	5.6	ND	0.62	ND	ND	ND	0.12	ND	ND	1.7	2.9	0.051 J	ND	ND	ND
Benzo(a)pyrene	1	ND	0.58	ND	ND	ND	0.1 J	ND	ND	1.6	3.6	ND	ND	ND	ND
Benzo(b)fluoranthene	5.6	ND	0.75	ND	ND	ND	0.14	ND	ND	2	4.4	0.048 J	ND	ND	ND
Benzo(ghi)perylene	500	ND	0.35	ND	ND	ND	0.062 J	ND	ND	0.98	2.4	ND	ND	ND	ND
Benzo(k)fluoranthene	56	ND	0.33	ND	ND	ND	0.068 J	ND	ND	0.76	1.5	ND	ND	ND	ND
Chrysene	56	ND	0.64	ND	ND	ND	0.12	ND	ND	1.6	3.3	0.048 J	ND	ND	ND
Dibenzo(a,h)anthracene	0.56	ND	0.086 J	ND	ND	ND	ND	ND	ND	0.26	0.66	ND	ND	ND	ND
Fluoranthene	500	ND	1.2	ND	ND	ND	0.21	ND	ND	3.7	7.1	0.086 J	ND	0.047 J	ND
Fluorene	500	ND	0.17 J	ND	ND	ND	ND	ND	ND	0.67	0.63	ND	ND	ND	ND
Indeno(1,2,3-cd)pyrene	5.6	ND	0.4	ND	ND	ND	0.072 J	ND	ND	1	2.6	ND	ND	ND	ND
Naphthalene	500	ND	0.32	ND	ND	ND	ND	ND	ND	0.45	0.43	ND	ND	ND	ND
Phenanthrene	500	ND	0.86	ND	ND	ND	0.12	ND	ND	3	6.1	0.057 J	ND	0.045 J	ND
Pyrene	500	ND	1	ND	ND	ND	0.19	ND	ND	3.1	6.5	0.072 J	ND	ND	ND
Total PAHs	500	ND	9.026 J	ND	ND	ND	1.202 J	ND	ND	23.91 J	44.71 J	0.362 J	ND	0.092 J	ND

- Notes:
- Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.
 - Values per NYSDEC Part 375 Soil Cleanup Objectives (SCOs).
 - Sample results were reported by the laboratory in ug/kg and converted to mg/kg for comparisons to SCOs.
 - SW-1 through SW-9 were sampled during the interim excavation along the Ohio Street property boundary.
 - BOTTOM 33 was labeled as "TANK C AREA" in the analytical report.

Definitions:
ND = Parameter not detected above laboratory detection limit.
"--" = No value available for the parameter. Or parameter not analysed for.
J = Estimated value; result is less than the sample quantitation limit but greater than zero.

Bold	= Results exceed Part 375 Commercial Use SCOs
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TABLE 4

SUMMARY OF MW-1 AREA POST-EXCAVATION SOIL ANALYTICAL RESULTS

300 Ohio Street Site

Buffalo, New York

PARAMETER ¹	Unrestricted Use SCOs ²	Commercial Use SCOs ²	SAMPLE LOCATION				
			MW-1 Excavation Area				
			Bottom 1	Northwall 1	Eastwall 1	Southwall 1	Westwall 1
			10/14/2014				
Polycyclic Aromatic Hydrocarbons (PAHs) - mg/Kg ³							
Benzo(a)anthracene	1	5.6	ND	0.1 J	ND	ND	0.09 J
Benzo(a)pyrene	1	1	ND	0.09 J	ND	ND	0.072 J
Benzo(b)fluoranthene	1	5.6	ND	0.081 J	ND	ND	0.055 J
Benzo(ghi)perylene	100	500	ND	0.059 J	ND	ND	ND
Benzo(k)fluoranthene	0.8	56	ND	0.077 J	ND	ND	0.069 J
Chrysene	1	56	ND	0.11 J	ND	ND	0.086 J
Fluoranthene	100	500	ND	0.15	ND	ND	0.14
Indeno(1,2,3-cd)pyrene	0.5	5.6	ND	0.057 J	ND	ND	ND
Naphthalene	12	500	ND	0.53	ND	ND	ND
Phenanthrene	100	500	ND	0.083 J	ND	ND	0.058 J
Pyrene	100	500	ND	0.14	ND	ND	0.12
Total PAHs	--	500	ND	1.477	ND	ND	0.69

Notes:

1. Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.
2. Values per NYSDEC Part 375 Soil Cleanup Objectives (SCOs).
3. Sample results were reported by the laboratory in ug/kg and converted to mg/kg for comparisons to SCOs.

Definitions:

ND = Parameter not detected above laboratory detection limit.

-- = No value available for the parameter. Or parameter not analysed for.

J = Estimated value; result is less than the sample quantitation limit but greater than zero.

Bold	= Results exceed Part 375 Unrestricted Use SCOs
Bold	= Results exceed Part 375 Commercial Use SCOs

TABLE 5

SUMMARY OF TP-13 AREA POST-EXCAVATION SOIL ANALYTICAL RESULTS

300 Ohio Street Site

Buffalo, New York

PARAMETER ¹	Unrestricted Use SCOs ²	Commercial Use SCOs ²	SAMPLE LOCATION				
			TP-13 Excavation Area				
			Bottom 1	Northwall 1	Eastwall 1	Southwall 1	Westwall 1
			10/13/2014				
<i>Metals - mg/Kg</i>							
Aluminum	--	--	6300	6500	8000	5900	3700
Antimony	--	--	ND	4.6 J	2.4	ND	8.4
Arsenic	13	16	5.4	9	11	3.9	12
Barium	350	400	36	120	150	35	150
Beryllium	7.2	590	0.32 J	0.41 J	0.45 J	0.33 J	0.51
Cadmium	2.5	9.3	ND	ND	0.98 J	ND	0.19 J
Calcium	--	--	1700	25000	33000	3800	110000
Chromium (Total)	30	1500	9.1	10	17	9.8	6.9
Cobalt	--	--	4.9	6.6	6.3	5.3	3.5
Copper	50	270	13	34	80	18	43
Iron	--	--	1300	20000	19000	12000	13000
Lead	63	1000	7	140	290	9.3	190
Magnesium	--	--	1300	6600	11000	2100	5300
Manganese	1600	10000	160	360	320	120	300
Nickel	30	310	12	14	18	14	10
Potassium	--	--	840	1400	1200	850	1000
Selenium	3.9	1500	ND	0.86 J	0.39 J	ND	1.2 J
Silver	2	1500	ND	ND	0.41 J	ND	ND
Sodium	--	--	76 J	200 J	240	70 J	170 J
Vanadium	--	--	15	15	17	16	11
Zinc	109	10000	32	69	390	36	78
Mercury	0.18	2.8	0.03 J	0.42	2.3	0.05 J	0.51

Notes:

- Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.
- Values per NYSDEC Part 375 Soil Cleanup Objectives (SCOs).
- Sample results were reported by the laboratory in ug/kg and converted to mg/kg for comparisons to SCOs.

Definitions:

ND = Parameter not detected above laboratory detection limit.

"--" = No value available for the parameter.

J = Estimated value; result is less than the sample quantitation limit but greater than zero.

Bold	= Results exceed Part 375 Unrestricted Use SCOs
Bold	= Results exceed Part 375 Commercial Use SCOs

TABLE 6
SUMMARY OFSS-10 AREA POST-EXCAVATION SOIL ANALYTICAL RESULTS
300 OHIO STREET SITE
BUFFALO, NEW YORK

PARAMETER ¹	Unrestricted Use SCOs ²	Commercial Use SCOs ²	SAMPLE LOCATION (DEPTH)												
			NW-1 (1.5')	NW-2 (1.5')	NW-3 (1.5')	SW-1 (1.5')	SW-2 (1.5')	EW-1 r (1.5')	EW-2 r (1.5')	WW-1 r 2 (1.5')	WW-2 r (1.5')	F1 (2.5')	F2 (3')	F3 r (3.5')	F4 (3')
			10/03/2016	10/03/2016	10/14/2016	10/04/2016	10/04/2016	10/07/2016	10/11/2016	10/14/2016	10/11/2016	10/03/2016	10/04/2016	10/11/2016	10/14/2016
Metals - mg/Kg															
Arsenic	13	16	24	15	21	41	78	6.5	2.4	19	3.6	9.3	3.6	3.2	16
Barium	350	400	260	260	290	150	210	100	61	500	49	140	57	57	250
Lead	63	1000	1100	910	1400	1300	9600	40	8	1400	37	350	59	24	720

Notes:

1. Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.
2. Values per 6NYCRR Part 375 Soil Cleanup Objectives (SCOs).

Bold	= Result exceeds Unrestricted Use SCOs.
Bold	= Result exceeds Commercial Use SCOs.

TABLE 7

SUMMARY OF REMEDIAL INVESTIGATION ANALYTICAL RESULTS REMAINING ON-SITE EXCEEDING USCOs

300 OHIO STREET SITE

BUFFALO, NEW YORK

PARAMETER ¹	Unrestricted Use SCOs ²	REMEDIAL INVESTIGATION SAMPLE LOCATION (DEPTH)											
		SS-2	SS-3	SS-4	SS-5	SS-6	SS-7	SS-8	SS-9	TP-18 (5-7)	TP-19 (4-6)	MW-4 (5-7)	MW-6 (6-8)
		07/12/2012	07/12/2012	07/12/2012	07/12/2012	07/12/2012	07/12/2012	07/12/2012	07/12/2012	07/10/2012	07/10/2012	07/11/2012	07/11/2012
Volatile Organic Compounds (VOCs) - mg/Kg ³													
1,2,3-Trichloropropane	--	--	--	--	--	--	--	--	--	ND	ND	--	ND
1,2,4,5-Tetramethylbenzene	--	--	--	--	--	--	--	--	--	ND	ND	--	ND
1,2,4-Trimethylbenzene	3.6	--	--	--	--	--	--	--	--	ND	ND	--	ND
1,3,5-Trimethylbenzene	8.4	--	--	--	--	--	--	--	--	ND	ND	--	ND
1,3-Dichlorobenzene	2.4	--	--	--	--	--	--	--	--	ND	ND	--	ND
1,4-Dichlorobenzene	1.8	--	--	--	--	--	--	--	--	ND	ND	--	ND
1,4-Diethylbenzene	--	--	--	--	--	--	--	--	--	ND	ND	--	ND
2-Butanone (MEK)	0.12	--	--	--	--	--	--	--	--	ND	ND	--	ND
4-Ethyltoluene	--	--	--	--	--	--	--	--	--	ND	ND	--	ND
Acetone	0.05	--	--	--	--	--	--	--	--	0.052	ND	--	ND
Benzene	0.06	--	--	--	--	--	--	--	--	ND	ND	--	ND
Carbon disulfide	--	--	--	--	--	--	--	--	--	ND	ND	--	ND
Chlorobenzene	1.1	--	--	--	--	--	--	--	--	ND	ND	--	ND
Ethylbenzene	1	--	--	--	--	--	--	--	--	ND	ND	--	ND
Isopropylbenzene (Cumene)	--	--	--	--	--	--	--	--	--	ND	ND	--	ND
Methyl tert butyl ether (MTBE)	0.93	--	--	--	--	--	--	--	--	ND	ND	--	ND
Methylene chloride	0.05	--	--	--	--	--	--	--	--	ND	ND	--	U
n-Butylbenzene	12	--	--	--	--	--	--	--	--	ND	ND	--	ND
n-Propylbenzene	3.9	--	--	--	--	--	--	--	--	ND	ND	--	ND
p-Isopropyltoluene	--	--	--	--	--	--	--	--	--	ND	ND	--	ND
sec-Butylbenzene	11	--	--	--	--	--	--	--	--	ND	ND	--	ND
Toluene	0.7	--	--	--	--	--	--	--	--	ND	ND	--	ND
Total Xylenes	0.26	--	--	--	--	--	--	--	--	ND	ND	--	ND
Semi-Volatile Organic Compounds (SVOCs) - mg/Kg ³													
2-Methylnaphthalene	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.15 J	1.2	ND
3-Methylphenol/4-Methylphenol	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.3 J	ND
Acenaphthene	20	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	3.1	1.6
Acenaphthylene	100	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1	1.2 J
Anthracene	100	ND	ND	3 J	ND	ND	1.3 J	ND	0.77 J	ND	0.11 J	6.1	5.7
Benzo(a)anthracene	1	ND	1.6 J	13	ND	ND	4.2 NJ	1.1	2.4 J	ND	0.42	7.3	11
Benzo(a)pyrene	1	ND	ND	11	ND	ND	3.9 J	1.2 J	2.3 J	ND	0.4	5.8	9.4
Benzo(b)fluoranthene	1	ND	3.1 J	17	3.2 J	2.3 J	5.6 J	1.9	3.8	ND	0.6	6.9	11
Benzo(ghi)perylene	100	ND	ND	7	ND	ND	2.8 J	0.99 J	1.9 J	ND	0.26 J	2.7	ND
Benzo(k)fluoranthene	0.8	ND	ND	6.4	ND	ND	2.1 J	0.62 J	1.4 J	ND	0.2 J	2.5	4.4
Biphenyl	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bis(2-ethylhexyl) phthalate	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Butyl benzyl phthalate	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbazole	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.55 J	1.7 J
Chrysene	1	ND	2 J	14	2.7 J	1.6 J	4.4 J	1.2	2.6	ND	0.58	6.3	9.5
Dibenzo(a,h)anthracene	0.33	ND	ND	1.9 J	ND	ND	0.73 J	ND	ND	ND	0.079 J	0.97	1.6
Dibenzofuran	7	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	2.5	ND
Fluoranthene	100	ND	2.9 J	29	3.5 J	2.2 J	8.5 J	2	4.9	ND	0.83	15 NJ	24
Fluorene	30	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	4.1	2.3
Indeno(1,2,3-cd)pyrene	0.5	ND	ND	8.2	ND	ND	3.3 J	1.2 J	2.2 J	ND	0.28 J	3.5	6.4
Naphthalene	12	ND	ND	ND	ND	ND	ND	ND	ND	0.088 J	ND	3.2	1.3 J
Phenanthrene	100	ND	ND	10	ND	ND	4.7 J	0.64 J	2.8	0.036 J	0.62	16	21
Phenol	0.33	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.32 J	ND
Pyrene	100	ND	2.5 J	26	3.3 J	2 J	7 J	1.8	4	ND	0.72	12	20
Total PAHs	--	0	12.1	146.5	12.7	8.1	48.53	12.65	29.07	0.124	5.099	99.52	132.1
Total Metals - mg/Kg													
Aluminum	--	21000	12000	12000	16000	10000	17000	21000	28000	--	5800 J	--	12000
Antimony	--	1.8 J	1.1 J	3.4 J	3.2 J	5.5 J	5.1 J	2.8 J	7.1 J	--	22 J	--	2.4 J
Arsenic	13	2.4	2.8	7.4	3.7	4.5	11	5	5.8	--	30	--	4.3
Barium	350	200	110	190	190	110	260	180	370	--	230	--	89
Beryllium	7.2	4.1	2	1.6	2.5	0.93	1.9	2.3	3.2	--	1.5	--	0.49
Cadmium	2.5	0.65 J	15	3.7	1.3	1.1	3.6	0.68 J	2.5	--	0.44 J	--	0.29 J
Calcium	--	160000 J	160000 J	120000 J	130000 J	120000 J	110000 J	140000 J	140000 J	--	6000	--	58000
Chromium	30	13 J	18 J	26 J	87 J	18 J	49 J	43 J	330 J	--	12	--	15
Cobalt	--	1.2 J	1.4 J	3.4	3.1	4.4	4	5.6	2.5	--	9.3	--	7.3
Copper	50	20	23	80	71	40	78	43	68	--	95	--	24
Iron	--	8600	9000	18000	27000	15000	32000	21000	38000	--	33000	--	20000
Lead	63	26	30	280	140	200	230	75	160	--	540	--	36
Magnesium	--	34000	430000	17000	32000	17000	12000	20000	20000	--	620 J	--	22000
Manganese	1600	2600 J	1300 J	940 J	3300 J	820 J	2300 J	2700 J	12000 J	--	170	--	410
Mercury	0.18	0.04 J	0.06 J	0.56 J	0.08 J	0.13 J	0.45 J	0.09 J	0.15 J	--	0.23	--	0.15 J
Nickel	30	5.8	6	16	21	14	20	17	16	--	23	--	17
Potassium	--	2300 J	1300 J	1300 J	1400	1300	2500	1900 J	2300 J	--	470 J	--	2600
Selenium	3.9	2.2	1.4 J	1.4 J	2.4	1.3 J	2.6	2.6	7.2	--	3	--	1.5
Silver	2	0.26 J	0.22 J	1.4	0.49 J	0.27 J	0.56 J	0.46 J	1.1	--	0.2 J	--	ND
Sodium	--	1300 J	2200 J	820 J	930 J	380 J	800 J	640 J	1000 J	--	460	--	380
Vanadium	--	11 J	12 J	18 J	32 J	16 J	29 J	23 J	80 J	--	23	--	22
Zinc	109	99 J	4400 J	1100 J	220 J	180 J	300 J	140 J	200 J	--	280	--	87 J
Total PCBs - mg/Kg ⁷													
Aroclor 1248	--	--	--	ND	--	--	0.451	ND	--	--	ND	--	ND
Aroclor 1254	--	--	--	0.0384	--	--	0.298	0.0197 J	--	--	ND	--	ND
Aroclor 1260	--	--	--	0.0402	--	--	0.165	0.0245 J	--	--	ND	--	ND
Total PCBs	0.1	--	--	0.0786	--	--	0.914	0.0442	--	--	--	--	--
Pesticides and Herbicides - mg/Kg ⁷													
4,4'-DDE	0.0033	--	--	ND	--	--	ND	ND	--	--	ND	--	ND
alpha-BHC	0.02	--	--	ND	--	--	ND	ND	--	--	ND	--	ND
beta-BHC	0.036	--	--	ND	--	--	ND	ND	--	--	ND	--	ND
Endrin	0.014	--	--	ND	--	--	ND	ND	--	--	U	--	ND
Endrine ketone	--	--	--	ND	--	--	UJ	ND	--	--	0.0109	--	ND
Methoxychlor	--	--	--	ND	--	--	0.0151 J	ND	--	--	ND	--	ND
trans-Chlordane	--	--	--	ND	--	--	UJ	ND	--	--	ND	--	ND

Notes:

1. Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.

2. Values per NYSDEC Part 375 Soil Cleanup Objectives (SCOs).

3. Sample results were reported by the laboratory in ug/kg and converted to mg/kg for comparisons to SCOs

Definitions:

ND = Parameter not detected above laboratory detection limit.

"--" = No value available for the parameter. Or parameter not analysed for.

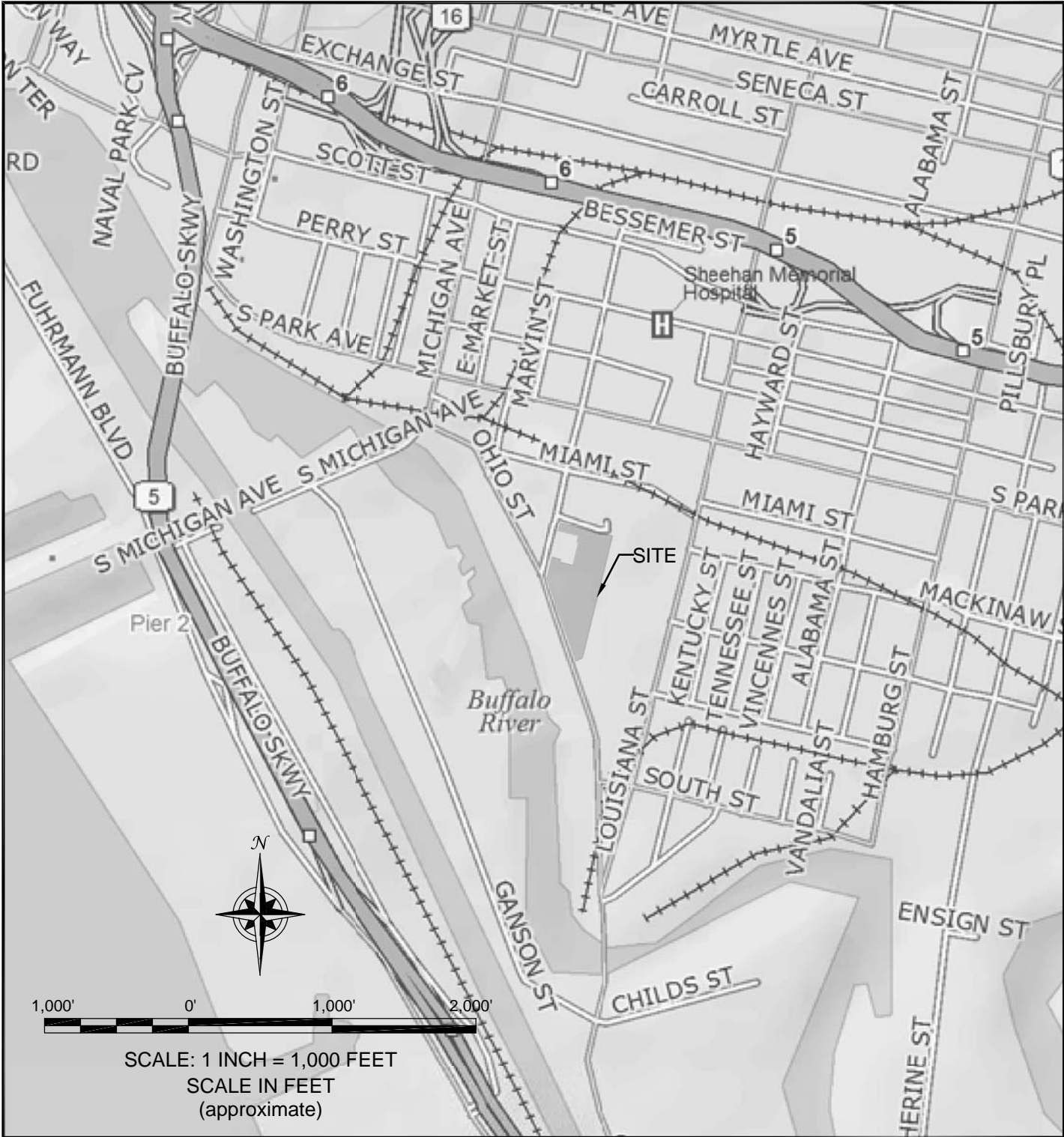
J = Estimated value; result is less than the sample quantitation limit but greater than zero.

NJ = The detection is tentative in identification and estimated in value. Although there is presumptive evidence of the analyte, the result should be used with caution as a potential false positive and/or elevated quantitative value.

U = The analyte was analyzed for, but was not detected above the level of the associated reported quantitation limit.

Bold	= Result exceeds Unrestricted Use SCOs.
-------------	---

FIGURE 1



2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218, (716) 856-0599



SITE LOCATION AND VICINITY MAP

SITE MANAGEMENT PLAN

300 OHIO STREET SITE
BCP SITE NO. C915257
BUFFALO, NEW YORK

PREPARED FOR

4216 GROUP, LLC

PROJECT NO.: 0136-037-102

DATE: OCTOBER 2017

DRAFTED BY: BLR-CMC

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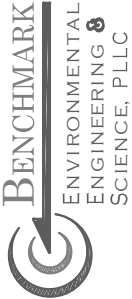


SITE PLAN (AERIAL)

SITE MANAGEMENT PLAN
300 OHIO STREET SITE
BCP SITE NO. C915257
BUFFALO, NEW YORK
PREPARED FOR
4216 GROUP, LLC



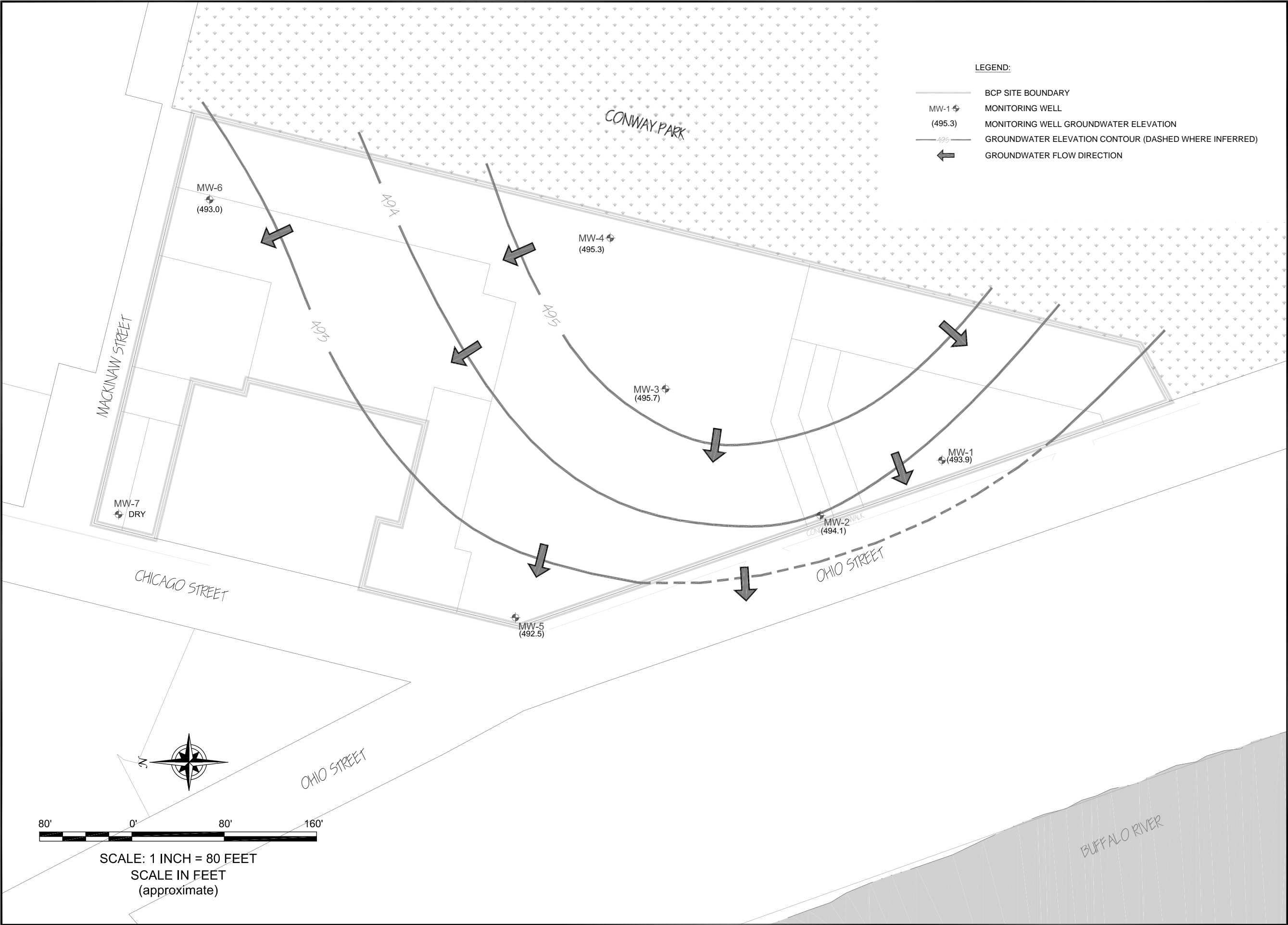
2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218, (716) 856-0599



JOB NO.: 0136-037-102

FIGURE 2

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GROUNDWATER CONTOUR MAP

SITE MANAGEMENT PLAN
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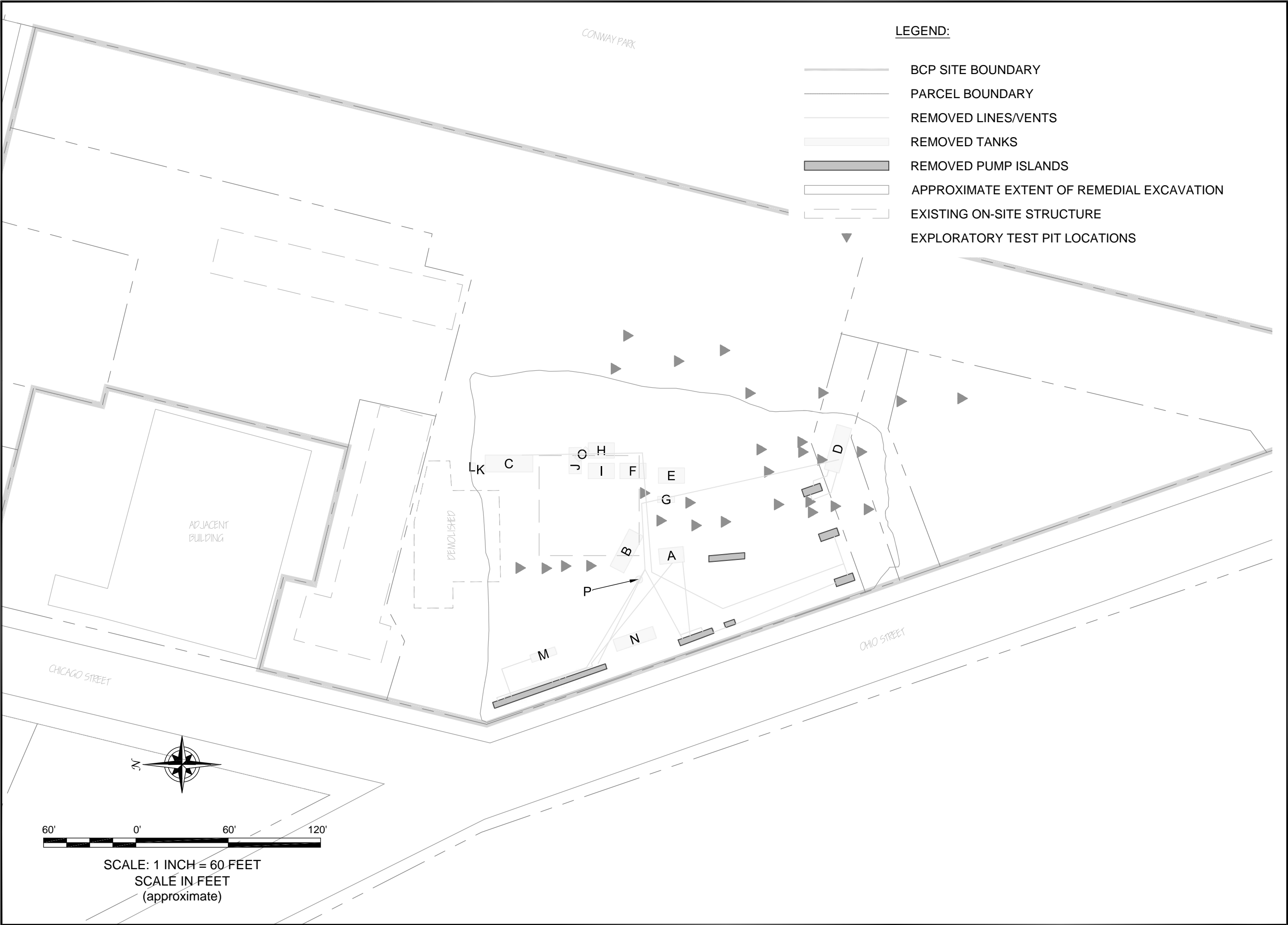
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FIGURE 3

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F:\CAD\TurnKey\Ellicott Development\300 Ohio Street\FER\Figure 3: Petroleum System Remedial Activities.dwg

DATE: MAY 2016
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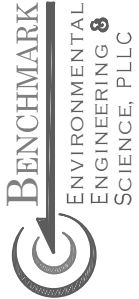


PETROLEUM SYSTEM REMEDIAL ACTIVITIES

SITE MANAGEMENT PLAN
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BCP SITE NO. C915257
BUFFALO, NEW YORK
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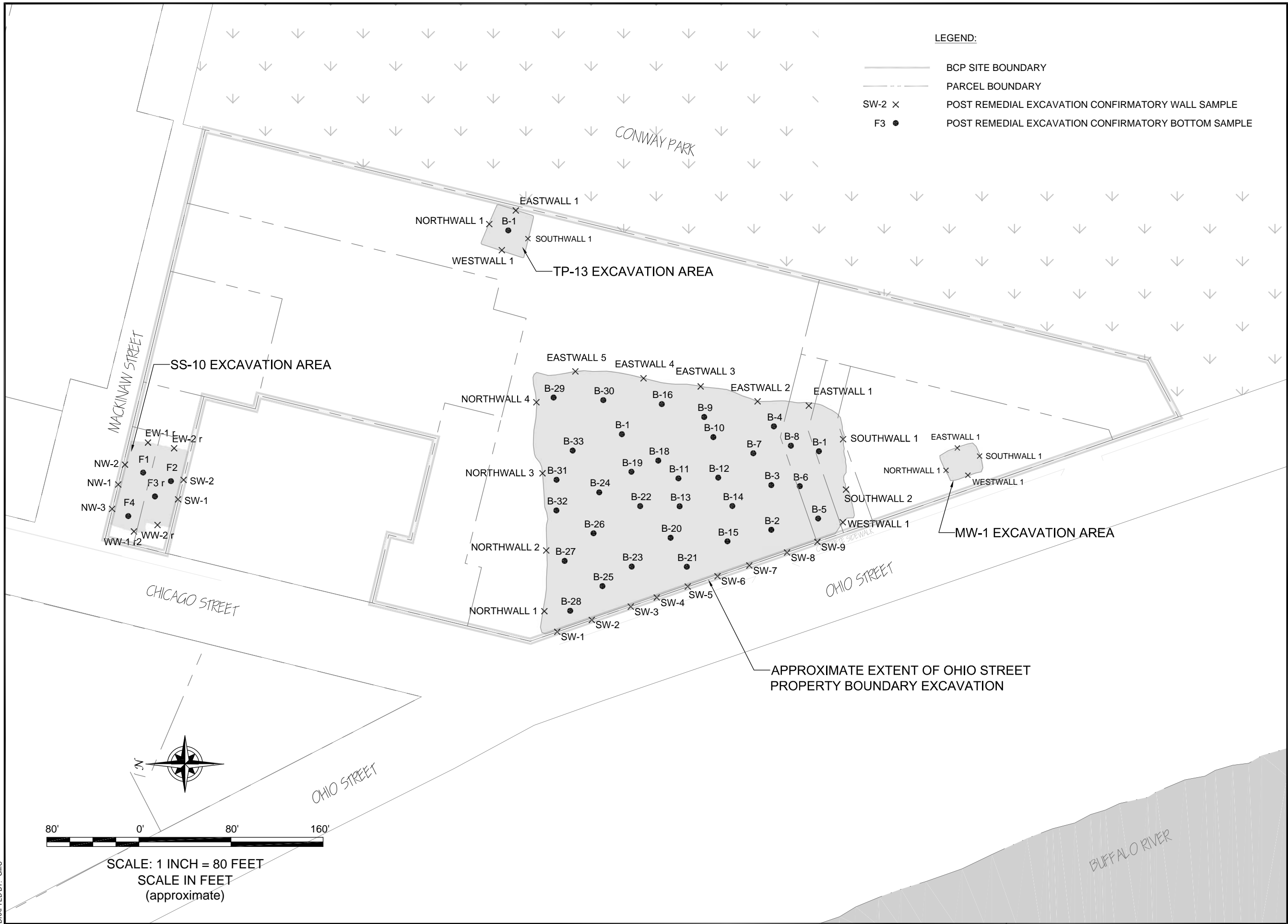
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FIGURE 4

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F:\CAD\TurnKey\Elliott Development\300 Ohio Street\FER\Figure 4; Post Excavation Sample Locations.dwg

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REMEDIAL EXCAVATION AREAS & CONFIRMATORY SAMPLE LOCATIONS

SITE MANAGEMENT PLAN

300 OHIO STREET SITE

BUFFALO, NEW YORK

PREPARED FOR

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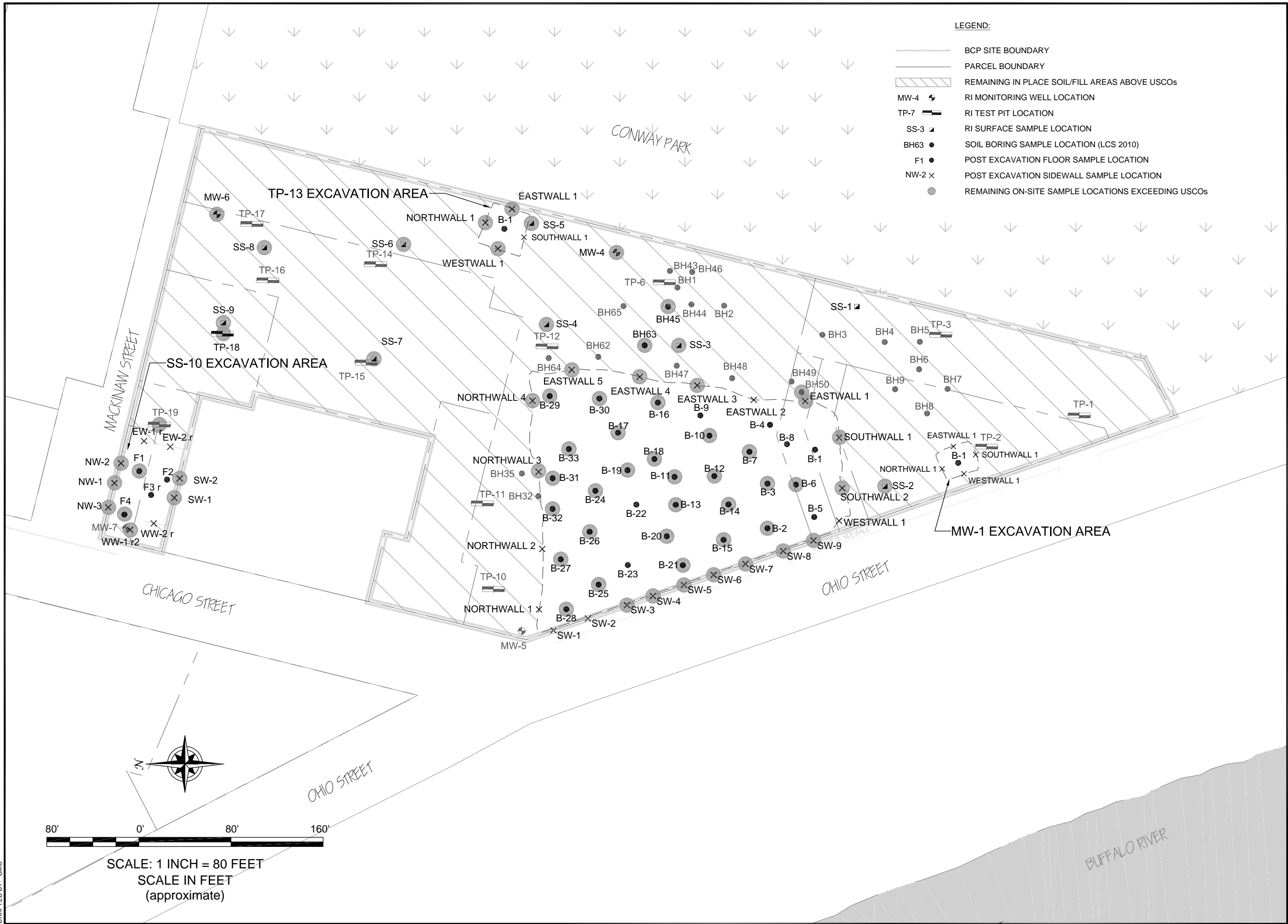
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FIGURE 5

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F:\CAD\TurnKey\Elliott Development\300 Ohio Street\FER\Figure 5; Remaining Soil_Fill Exceeding USCOS.dwg

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REMAINING SOIL/FILL EXCEEDING USCOS

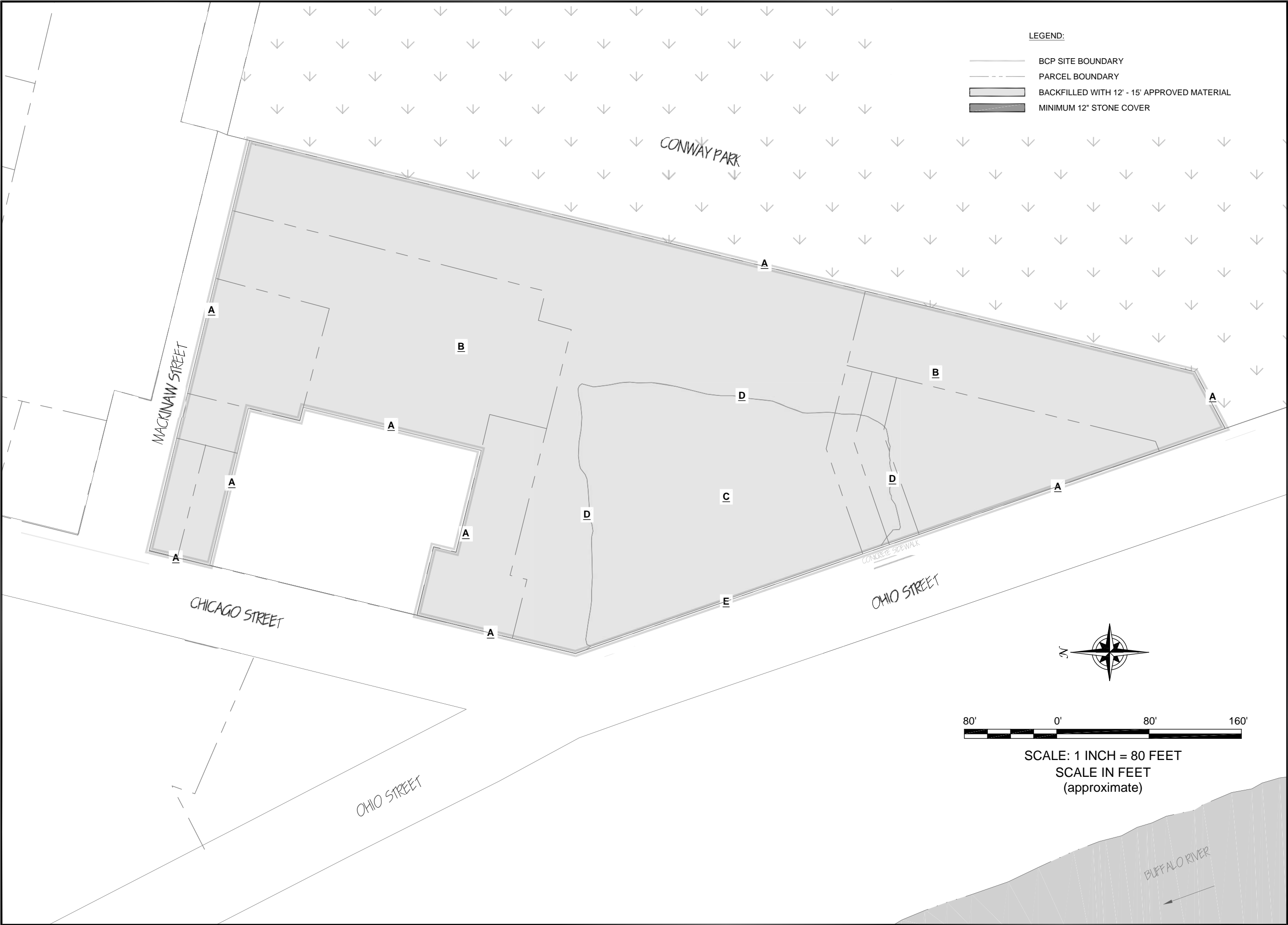
SITE MANAGEMENT PLAN
300 OHIO STREET SITE
BUFFALO, NEW YORK
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SUITE 300
BUFFALO, NY 14218
(716) 856-0599
ENVIRONMENTAL
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FIGURE 6

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COVER SYSTEM LAYOUT AND DETAILS

SITE MANAGEMENT PLAN
300 OHIO STREET SITE
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FIGURE 7a



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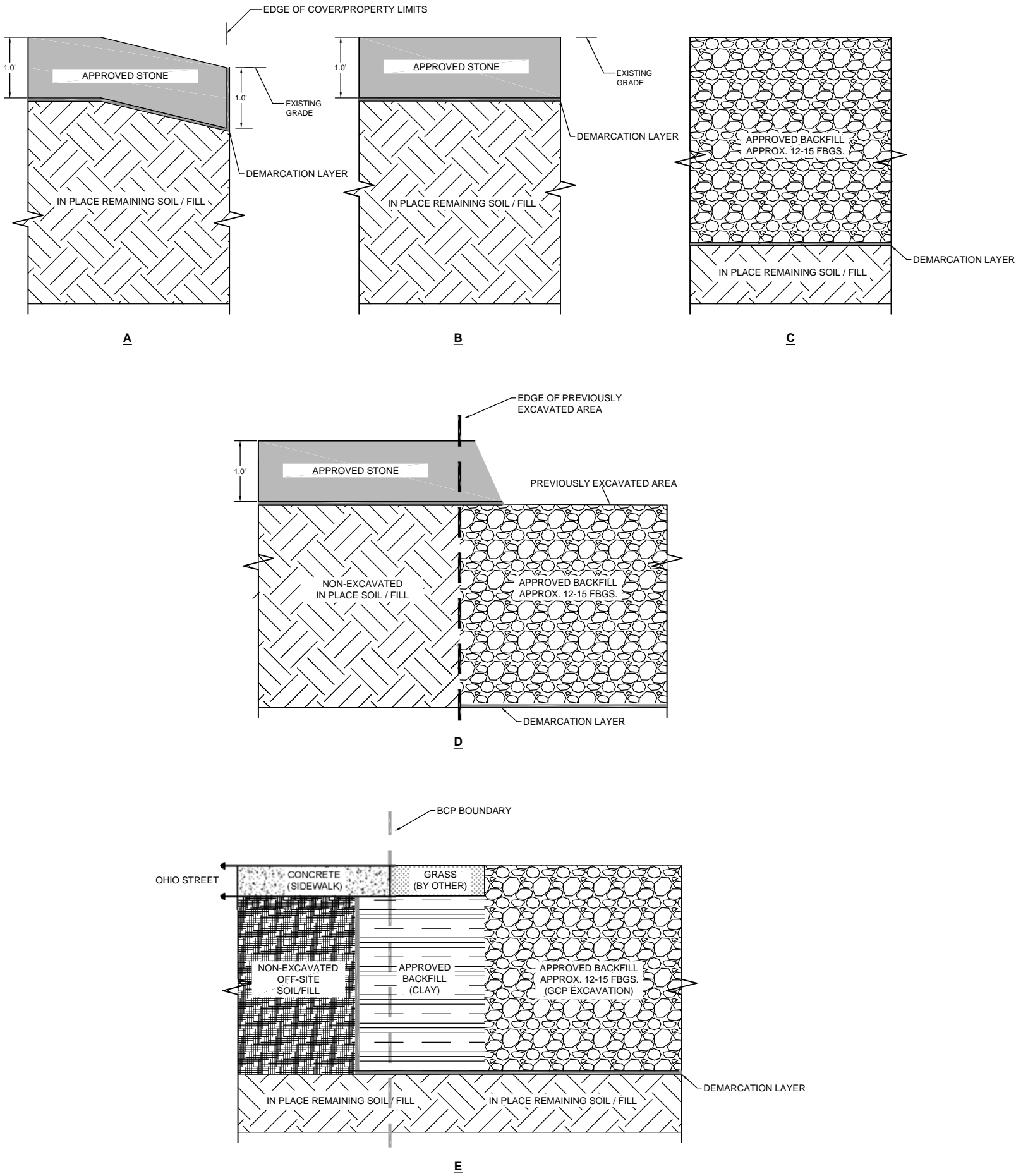


FIGURE 7b

COVER SYSTEM LAYOUT AND DETAILS

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