June 1, 2023 (revised July 19, 2023)

Mr. Benjamin McPherson, P.E.
Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 9
270 Michigan Avenue
Buffalo, New York 14203-2999

Re: SVE System 2-SVE-1 Verification Soil Sampling Work Plan
Olean Redevelopment Parcel 2 (Site No. C905032)

Dear Mr. McPherson:

Benchmark Civil/Environmental Engineering & Geology, PLLC in association with TurnKey Environmental Restoration, LLC (Benchmark-TurnKey) have been monitoring the soil vapor extraction (SVE) system on the Olean Redevelopment Parcel 2 in Olean, New York ("Site") (BCP Site No. C905032) since its installation in late 2014 in accordance with the NYSDEC-approved Site Management Plan (SMP)[1]. The current Site owner, Solean West, LLC, is responsible for operation, maintenance, and monitoring (OM&M) of SVE System 2-SVE-1.

Benchmark-TurnKey, on behalf of Solean West, LLC, submitted the revised Verification Soil Sampling (VSS) Work Plan to the New York State Department of Environmental Conservation (NYSDEC) on August 22, 2019. The Department approved the Work Plan on August 23, 2019. Benchmark-TurnKey performed the work on September 12, 2019 and submitted the results to NYSDEC on November 18, 2019 to request termination of SVE operation. Six borings were completed at the locations shown on Figure 1. In summary, all post-treated VOC concentrations were below commercial soil cleanup objectives (CSCOs) with constituents of concern below residential soil cleanup objectives (RSCOs). Four volatile organic compounds (VOCs) were present at concentrations above method detection limits (MDL) in sample VSS-6 (8-10 feet below ground surface; fbgs). All concentrations detected in VSS-6 were below NYSDEC Part 375 RSCOs and CSCOs. Benzene was detected at an estimated concentration slightly above its unrestricted SCO (USCO) but below its RSCO in VSS-6. The Department replied on January 6, 2020 stating that system shutdown was not approved; however, the SVE operation could be reduced and optimized to focus on treating areas showing impact. After further discussions with the Department, an additional request was filed on March 16, 2020 proposing the following:

- Discontinue operation of the eastern leg of the SVE system (SVE wells 2-SVE-8 through 2-SVE-13)

[1] Benchmark Environmental Engineering & Science, PLLC. *Site Management Plan, Olean Redevelopment Parcel 2, Olean, New York, BCP Site No. C905032*. Revised August 2018.

- Continue operating SVE wells 2-SVE-2 through 2-SVE-6 and shutting off wells 2-SVE-1 and 2-SVE-7 due to consistently low wellhead PID readings and to obtain higher vacuum at the operating wells.
- Continue PID readings at SVE wellheads 2-SVE-1 through 2-SVE-13.
- Discontinue operation of the SVE system during the winter months (December through March) with startup once temperatures are consistently above 32°F.

On April 1, 2020 the Department issued an approval of the proposed reduction in SVE system operation, which supersedes the operational requirements of the SMP. Over the 2020-2022 monitoring periods, Benchmark-TurnKey turned off SVE wells 2-SVE-2, -7, -9, and -12 to relieve pressure on the system and operated wells with the highest photoionization detector (PID) readings to better balance the operating system. During the 2022-2023 operating period, SVE well 2-SVE-2 was turned on.

The purpose of this letter is to update the results of monitoring for the VOC mass removal associated with SVE System 2-SVE-1 and propose additional soil verification sampling and testing be completed to support a request for SVE discontinuation of this system.

BACKGROUND

Interim Remedial Measures (IRMs) were previously performed in 2010 by ExxonMobil in accordance with the IRM Work Plan. The IRM Report for the Buffalo Street properties (referred to previously as BCP Site Nos. 1, 2, & 3) was prepared in March 2011 prior to the property being purchased by Olean Gateway. Olean Gateway, LLC (OG) executed a Brownfield Cleanup Agreement (BCA) with NYSDEC on October 16, 2012. The Site was remediated from 2010 to 2015 and received a certificate of completion (COC) in December 2015. Solean West purchased the Site in March 2016 and has been conducting the OM&M since that time.

As part of the Site remedy, SVE System 2-SVE-1 was installed and has been operating since October 2014. OM&M of the SVE system is part of the monitoring required in the approved SMP. The SVE system has operated nearly continuously for over 2,400 days. The rate of removal for 2-SVE-1 has decreased from a maximum of 95 pounds per day during the initial mass removal period (2014) to an average of 0.14 pounds per day over the 2022-2023 reporting period.

SVE VERIFICATION SOIL SAMPLING

Benchmark-TurnKey is proposing to collect additional post-treatment soil samples following the sampling, handling, and testing procedures described in the RAWP and SMP. Two additional samples will be collected near 2019 sample locations VSS-5 and VSS-6. Figure 1 provides proposed verification soil sampling locations VSS-7 and VSS-8. Soil samples will be located using a Trimble Handheld GPS unit and collected using a direct-push drill rig.

Based on 2019 verification sampling results, visual and olfactory impacts were identified from 14-18 fbgs at VSS-5 and 8-10 fbgs and 12-14 fbgs at VSS-6. Well 2-SVE-6 (near VSS-5) is screened from 6-16 fbgs and well 2-SVE-3 (near VSS-6) is screened from 3-16 fbgs. If visual or olfactory impacts are noted across an interval below where suspected water table is observed, soil/fill directly above the water table will be selected for analysis. At the time of verification sampling, the entire macro-core

sleeve will be photographed and field-screened with a PID, and evidence of visual and olfactory impact will be noted. One sample will be collected from the most impacted soil/fill interval from each boring. Two soil samples will be tested at an analytical laboratory and analyzed using United States Environmental Protection Agency (USEPA) Method 8260 for Target Compound List VOCs plus tentatively identified compounds (TICs).

Benchmark-TurnKey will prepare a letter report that will include the boring logs with soil descriptions and field observations; results of soil sample analyses with a comparison to previous results; photographs of the entire boring core; and a recommendation for termination of the SVE system, if appropriate. In the interim, SVE System 2-SVE-1 will be operated as approved.

We are prepared to initiate the verification soil sampling once we receive your approval. If you have questions or comments, please contact us.

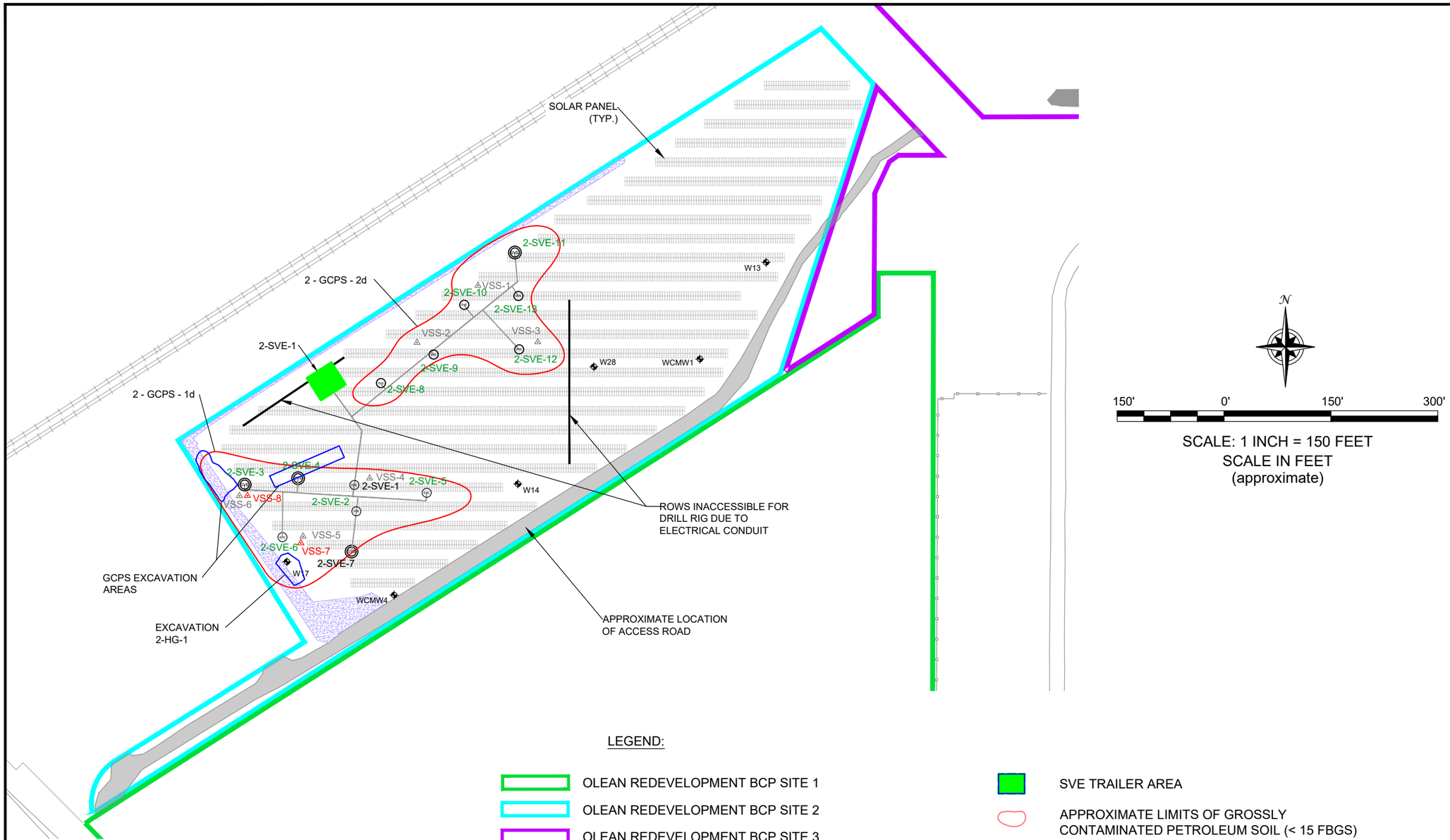
Sincerely,
TurnKey Environmental Restoration, LLC

Michael A. Lesakowski
Sr. Project Manager

Lori E. Riker, P.E.
Sr. Project Engineer

Att.
ec: Paul Curran (Solean West LLC)

FIGURE



LEGEND:

- OLEAN REDEVELOPMENT BCP SITE 1
- OLEAN REDEVELOPMENT BCP SITE 2
- OLEAN REDEVELOPMENT BCP SITE 3
- SVE EXTRACTION WELL (SCREEN FROM 6 TO 16')
- SVE EXTRACTION WELL (SCREEN FROM 3 TO 16')
- SVE PIPING LATERALS
- SVE PIPING FORCE MAIN
- WCMW4 EXISTING MONITORING WELL
- VSS-1 HISTORIC VERIFICATION SOIL BORING LOCATION
- VSS-7 VERIFICATION SOIL BORING LOCATION
- SVE TRAILER AREA
- APPROXIMATE LIMITS OF GROSSLY CONTAMINATED PETROLEUM SOIL (< 15 FBGS)
- REMEDIAL EXCAVATION LIMITS

VERIFICATION SOIL SAMPLING LOCATIONS

VERIFICATION SOIL SAMPLING WORK PLAN

OLEAN REDEVELOPMENT PARCEL 2
BCP SITE NO. C905032
OLEAN, NEW YORK

PREPARED FOR
SOLEAN WEST LLC

FIGURE 1

BENCHMARK
2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218,
(716) 856-0599
JOB NO.: 0370-016-001

BENCHMARK CIVIL/ENVIRONMENTAL ENGINEERING &
GEOLOGY, PLLC CERTIFICATE NO. 0018303

DATE: JUNE 2019
DRAFTED BY: CMC

F:\CAD\Benchmark\Solean West\Figure 1: Soil Fill Verification Sampling Plan_2023.dwg, 6/1/2023 3:39:29 PM