June 20, 2022

Mr. Benjamin McPherson
Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation
270 Michigan Ave.
Buffalo, New York 14203

Re: Pre-Design Investigation Work Plan
351 Franklin Street Site
Olean, New York
BCP Site No. C905047

Dear Mr. McPherson:

On behalf of our client, 351 Franklin Street LLC & PSF of WNY, LLC, Benchmark Civil/Environmental Engineering & Geology, PLLC in association with TurnKey Environmental Restoration, LLC (Benchmark-TurnKey) has prepared this Pre-Design Investigation (PDI) Work Plan for the above-referenced Site. This Work Plan has been prepared to further investigate the horizontal and vertical extents of grossly contaminated media (GCM) identified during the Remedial Investigation (RI), per correspondence with the NYSDEC on March 25, 2022. Results of the PDI will be used to supplement the RI and more accurately define the extent of GCM excavations and/or in-situ solidification (ISS) to be completed during remedial action (RA) activities.

The findings of the PDI will be incorporated into the Remedial Action Work Plan (RAWP).

BACKGROUND

This document presents the proposed scope of work and implementation procedures for completion of a PDI at the 351 Franklin Street Site in the City of Olean, New York (Site, see Figure 1).

TurnKey completed initial RI fieldwork from January to March 2021. In general, and as summarized in the RI text and analytical summary tables previously provided, the RI findings included:

2558 Hamburg Turnpike, Suite 300 | Buffalo, NY 14218
phone: (716) 856-0599 | fax: (716) 856-0583

Visual Impacts/GCM

- Petroleum odors and elevated PID readings were detected at all subsurface investigation locations, with the highest reading of 1,121 ppm at MW-2 (19 fbgs).
- Grossly contaminated media (GCM), defined as soils exhibiting the presence of mobile petroleum product/light non-aqueous phase liquid (LNAPL), was detected at seven (7) test pit locations, three (3) test trench locations, and fifteen (15) soil boring locations. GCM was detected in the subsurface within six (6) areas of concern (GCM Area 1 through GCM Area 6) at depths ranging between approximately 5 and 26 fbgs.

Soil

- Arsenic and SVOC-impacted soil/fill was observed exceeding 6 NYCRR Part 375 Commercial Soil Cleanup Objectives (CSCOs) in the subsurface at depths ranging from 2 to 20 fbgs.

Groundwater

- VOCs, SVOCs pesticides, and naturally occurring metals were detected across the Site above their respective GWQS. Other metals including total arsenic, total copper, and total lead, were detected at MW-3 and MW-9 above GWQS. However, dissolved arsenic, copper, and lead were not detected exceeding GWQS at these locations, and groundwater collected from MW-3 and MW-9 was noted for having high turbidity during sampling. No PCBs, herbicides, 1,4-dioxane, or PFAS were detected above their respective GWQS or NYSDEC action levels.
- LNAPL was detected at MW-3, MW-6, and MW-7, indicating that there is likely an on-Site localized source of GCM in the vicinity of these monitoring locations.
- Additional sampling for VOCs completed in October 2021 indicated elevated concentrations of VOCs above GWQS at MW-2 and MW-5.

Soil Vapor Intrusion

- Analytical results in comparison to the New York State Department of Health (NYSDOH) Decision Matrices indicate that no monitoring or mitigation is required in Building 2. However, further assessment was completed due to elevated concentrations of parameters that are not included in the NYSDOH Decision Matrices. Soil vapor intrusion (SVI) results were compared to NYSDEC indoor air 90th percentile values and six (6) parameters were detected exceeding these values. These six (6) parameters were compared to Occupational Safety and Health Administration (OSHA) Permissible Exposure Limits (PELs) and only 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene were detected exceeding these limits. However, as neither parameter is identified as contaminants of potential concern (COPCs) in the soil or groundwater, it is unlikely that these elevated concentrations are sourced from the Site, and therefore they are not considered COPCs in the sub-slab. Therefore, no active sub-slab depressurization (ASD) system is required in Building 1 under its current use. If Building 1 changes use, an additional SVI investigation will be completed.

- There is a potential for SVI in the planned new Building 2, due to the presence of petroleum-impacted soil and groundwater. Therefore, further testing will be completed after construction to determine whether the ASD system is needed to mitigate vapor intrusion.

Soil Vapor

- Elevated parameters were identified in the soil vapor samples, however none of the contaminants were identified as COPCs in the soil and groundwater. Surrounding properties include industrial use facilities and were formerly used for the same/similar purposes as the subject Site. Therefore, these results may indicate that there is an on-site contribution to soil vapor contamination, however it is also possible that the detected compounds are sourced off-Site and therefore are not COPCs in the soil vapor.

PROJECT OBJECTIVES

This PDI Work Plan outlines the scope of work that will be completed to further define the horizontal and vertical extents of GCM at the Site, per correspondence with the NYSDEC on March 25, 2022. The PDI will be completed by Benchmark-TurnKey on behalf of 351 Franklin Street LLC & PSF of WNY, LLC. The work will be completed in accordance with NYSDEC DER-10 guidelines, the approved January 2021 RI Work Plan protocols, and this PDI Work Plan. The objectives of the PDI are discussed below and shown on Figure 1.

1. Installation of monitoring wells (MW) at several locations to further delineate the horizontal extents of GCM on groundwater across the Site:
    - MW-10 through MW-14 will be installed proximate to TP-1, TT-5, TP-16, TT-11, and SB-5/TT-8. Mobile petroleum product was identified at the groundwater interface only at all locations listed above with the exception of TT-8, where GCM was identified in the soil from 8-10 fbgs, approximately ten feet above the water table. Once installed and developed, as discussed below, monitoring wells will gauged and additional action may be taken during the RA based on the measured thickness of LNAPL in each well.
2. Advance soil borings to further identify the horizontal and vertical extents of GCM:
    - LNAPL was identified accumulating at MW-3, however no GCM was identified on soil or groundwater during soil boring advancement at this location. An additional soil boring (SB-18) will be advanced in the area between TT-6 and MW-3 to assess whether the southern extent of GCM Area 4 is properly defined. MW-3 will also be gauged and additional action may be taken during the RA based on the measured thickness of LNAPL in the well.
    - The full vertical extent of GCM at SB-11 was not identified during the RI; the depth of GCM at this location is at least 24 fbgs, however the boring did not extend to clean soil. An additional soil boring (SB-19) will be advanced

proximate to SB-11 to define the vertical extent of GCM in this location. ISS will be completed to the depth required to treat GCM during RA activities.

The following activities requested during the March 2022 correspondence will be discussed in the RI/AA Report and completed pursuant to a NYSDEC-approved Remedial Action Work Plan (RAWP). No further discussion of these activities will be included in this work plan.

1. Mobile petroleum product was identified on the groundwater at TP-4, which was previously located outside the extents of GCM Area 1. GCM Area 1 will be extended to include TP-4 and excavation/ISS will be completed to the vertical extent of GCM at this location.
2. ISS is planned for GCM Areas 1 and GCM Area 4. ISS will be completed to nominally 2 ft below the water table or greater as needed (e.g., GCM was identified at depths greater than 2 ft below the water table at SB-10, SB-11, SB-12, and SB-16). Additionally, if GCM is observed below the water table at GCM Areas 2, 3, 5, and/or 6 during remedial action activities, additional ISS will be completed.

GCM ASSESSMENT

Seven (7) soil borings (SB-18, SB-19, and MW-10 through MW-14) will be advanced to further refine the horizontal and vertical extents of GCM in soil and 5 of the 7 soil borings (MW-10 through MW-14) will be converted into monitoring wells to further identify the horizontal extent of GCM on groundwater. The soil borings will be advanced using a traditional hollow stem auger (HSA) drill rig to a target depth of 30 feet. Representative samples will be described in the field by qualified Benchmark-TurnKey personnel, scanned for total volatile organic vapors with a calibrated MiniRAE 2000 PID equipped with a 10.6 eV lamp (or equivalent), and characterized for impacts via visual and/or olfactory observations. Evidence of GCM will be documented. Photographs of each soil boring will be taken as documentation. Each location will also be mapped using a hand-held GPS unit. Real time air monitoring will be collected using the Community Air Monitoring Plan (CAMP) included in Appendix C of the RI Work Plan.

ADDITIONAL GROUNDWATER ASSESSMENT

Monitoring Well Installation

Five (5) two-inch diameter groundwater monitoring wells, identified as MW-10 through MW-14, will be advanced to further assess the extent of GCM on groundwater across the Site. Each monitoring well will be constructed with two (2)-inch diameter Schedule (SCH.) 40 PVC with a minimum fifteen (15)-foot flush joint SCH.40 PVC 0.010-inch machine-slotted well screen. Each well screen and attached riser will be placed at the bottom of the borehole and a silica sand filter pack (size #0) will be installed from the base of the well to a minimum of two (2)-feet above the top of the screen. A seal (e.g. bentonite chip) will then be installed to mitigate the potential for downhole contamination. The newly installed monitoring wells will be

completed with keyed-alike locks, a lockable J-plug, and a protective casing/road box. All non-dedicated drilling tools and equipment will be decontaminated between boring locations.

Monitoring Well Development

After installation, but not within 24 hours, the newly installed monitoring wells will be developed in accordance with Benchmark-TurnKey and NYSDEC protocols. Development of the monitoring wells will be accomplished with dedicated disposable high-density polyethylene (HDPE) bailers via surge and purge methodology. Field parameters including pH, temperature, turbidity, dissolved oxygen (DO), oxidation-reduction potential (ORP), and specific conductance will be measured periodically (i.e., every well volume or as necessary) during development. Field measurements will continue until they become relatively stable. Stability will be defined as variation between measurements of approximately 10 percent or less with no overall upward or downward trend in the measurements. A minimum of three (3) well volumes will be evacuated from each monitoring well. Development water from the monitoring wells will be containerized in drums and properly labeled. Based on the RI groundwater analytical results, it will be determined, in consultation with the Department, if the containerized development water is acceptable for surface discharge or requires subsequent on-Site treatment and/or off-Site disposal.

Water Level and LNAPL Monitoring

A round of water level/product monitoring will be completed for all on-site wells, including the newly installed wells, to assess groundwater flow and product thickness, if present. Based on the thickness of LNAPL detected at each well, the following actions will be taken as part of the remedial activities, which will be summarized in the RAWP:

- If LNAPL thickness is identified as greater than or equal to one foot, the well will be gauged for three consecutive months during remedial action. If greater than one foot of LNAPL is identified at these locations for all three consecutive months, the material will be designated as GCM, and physical removal (excavation and ISS) will be completed as a part of remedial action. If not, the location will be identified as a potential source and monitored. Locations identified as a potential source will be subject to semi-annual monitoring and/or reduction measures (if LNAPL thickness if observed between 1 inch and 1 foot) including: passive or active capture, transmissivity testing, and/or long-term monitoring until LNAPL is not present during two consecutive semi-annual monitoring events.
- If LNAPL thickness is identified as less than one foot, the location will be identified as a potential source and monitored. Locations identified as a potential source will be subject to semi-annual monitoring and/or reduction measures (if LNAPL thickness if observed between 1 inch and 1 foot) including: passive or active capture, transmissivity testing, and/or long-term monitoring until LNAPL is not present during two consecutive semi-annual monitoring events.
- If no LNAPL is identified on groundwater, no further action will be taken.

Further discussion of LNAPL monitoring and planned remedial measures will be discussed in the RAWP.

SITE MAPPING AND REPORTING

The Site map developed during the RI will be supplemented with the sample locations and wells identified herein. TurnKey will employ a Trimble GeoXH handheld GPS unit to identify the locations of all soil borings and newly installed wells relative to State planar grid coordinates. Monitoring well elevations will be measured by TurnKey's surveyor. An isopotential map showing the general direction of groundwater flow will be prepared based on water level measurements relative to USGS vertical datum. The findings of the PDI and updated Site maps will be incorporated into the RAWP.

PROJECT SCHEDULE

TurnKey is prepared to mobilize to the Site on June 21, 2022 to complete the Supplemental RI tasks upon NYSDEC approval of this Work Plan.

Sincerely,
Benchmark Civil/Environmental Engineering & Geology, PLLC
TurnKey Environmental Restoration, LLC

Michael Lesakowski
Sr. Project Manager/Principal

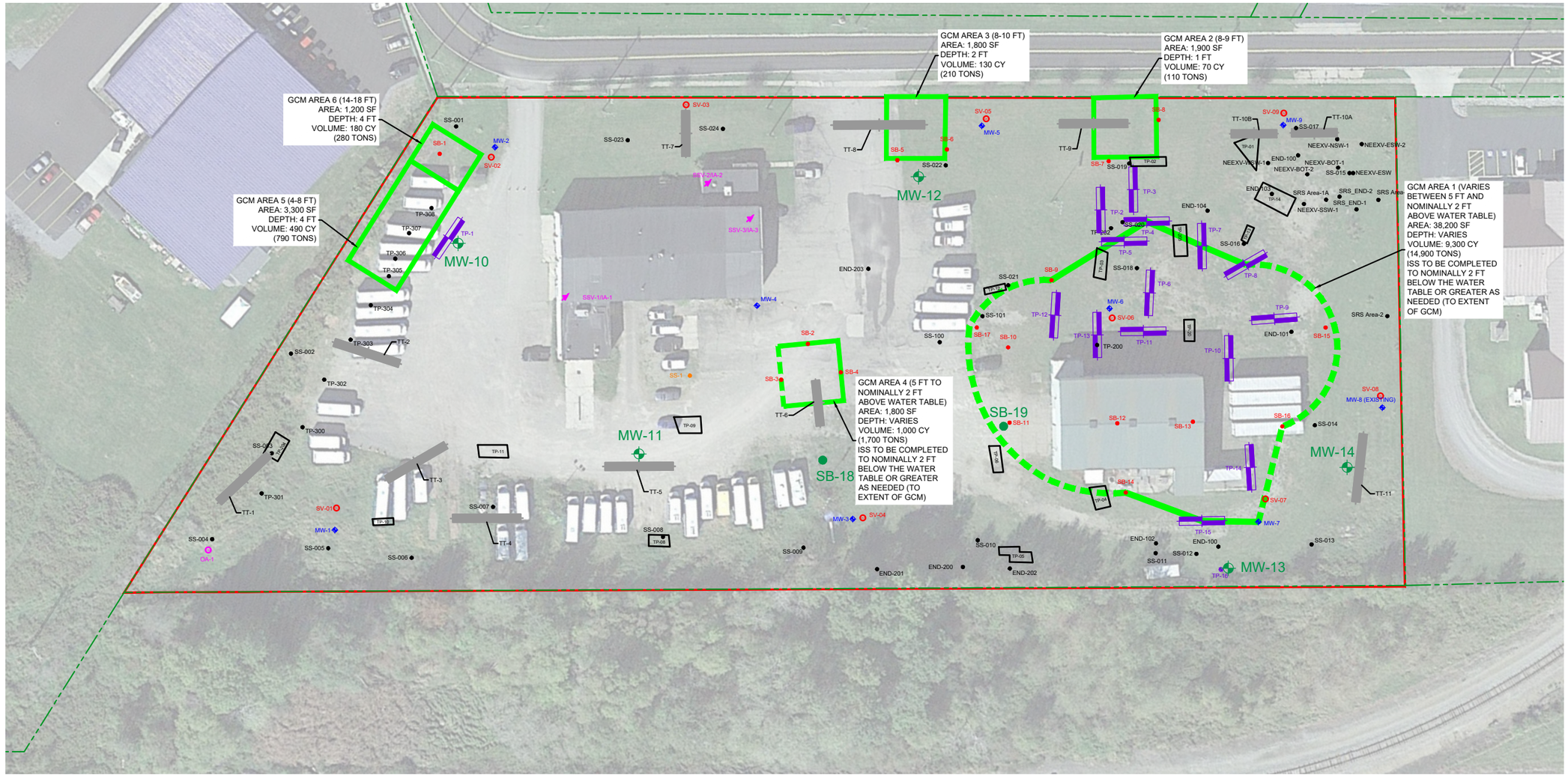
Chelsea Kanaley
Geologist

ec: K. Kulow (NYSDOH)
T. Forbes (Benchmark-TurnKey)

File: 0510-019-001

FIGURES

F:\CAD\TurnKey\351 Franklin Street, LLC\PDI\Figure X - Additional Remedial Activities - Track 4 CSCOs.dwg, 6/17/2022 11:08:42 AM, DWG To PDF.pc3



LEGEND:

	BCP SITE BOUNDARY
	PARCEL BOUNDARY
SRS Area-1 ●	PREVIOUS SAMPLE LOCATIONS (BY ROUX, 2015)
END-100 ●	PREVIOUS SAMPLE LOCATION (BY ROUX, 2016)
TP-01	PREVIOUS SHALLOW TEST PIT (BY ROUX, 2016)
TP-302 ●	PREVIOUS SAMPLE LOCATION (BY ROUX, 2017)
SS-005 ●	PREVIOUS SAMPLE LOCATION (BY ROUX, 2017)
TP-1	RI TEST PIT
TT-1	RI TEST TRENCH
MW-1	RI MONITORING WELL/SOIL BORING/SHALLOW SURFACE SAMPLE
SS-1 ●	RI SHALLOW SURFACE SAMPLE
SB-1 ●	RI ADDITIONAL SOIL BORING
SV-01	RI SOIL VAPOR SAMPLE
SSV-1/IA-1	RI SUBSLAB SOIL VAPOR/INDOOR AIR SAMPLE
OA-1	RI OUTDOOR AIR SAMPLE
	PROPOSED EXCAVATION EXTENT.
	PROPOSED EXCAVATION EXTENT (APPROXIMATE, SEE NOTE 2).
MW-1	PDI MONITORING WELL/SOIL BORING
SB-1 ●	PDI SOIL BORING

NOTES:
1. GCM = GROSSLY CONTAMINATED MEDIA
2. DOTTED LINE INDICATES ESTIMATED EDGE THAT MAY BE EXTENDED IF ADDITIONAL GCM IS IDENTIFIED.
3. ADDITIONAL MONITORING WELLS AND SOIL BORINGS WILL BE COMPLETED AS A PART OF THE PRE-DESIGN INVESTIGATION (PDI) TO FURTHER DELINEATE GCM EXCAVATION AND ISS AREAS.

80' 0' 80' 160'

SCALE: 1 INCH = 80 FEET
SCALE IN FEET
(approximate)

DATE: JUNE 2022
DRAFTED BY: CNK

TURNKEY ENVIRONMENTAL RESTORATION, LLC
IN ASSOCIATION WITH
BENCHMARK

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

JOB NO.: T0510-019-001

ADDITIONAL INVESTIGATION LOCATIONS FOR DELINEATION OF GCM EXCAVATION AND ISS AREAS

PRE- DESIGN INVESTIGATION

351 FRANKLIN STREET SITE
OLEAN, NEW YORK

PREPARED FOR

351 FRANKLIN STREET LLC & PSF OR WNY, LLC

FIGURE 1

DISCLAIMER: PROPERTY OF BENCHMARK CIVIL/ENVIRONMENTAL ENGINEERING & GEOLOGY, PLLC. & TURNKEY ENVIRONMENTAL RESTORATION, LLC *IMPORTANT: THIS DRAWING PRINT IS LOANED FOR MUTUAL ASSISTANCE AND AS SUCH IS SUBJECT TO RECALL AT ANY TIME. INFORMATION CONTAINED HEREON IS NOT TO BE DISCLOSED OR REPRODUCED IN ANY FORM FOR THE BENEFIT OF PARTIES OTHER THAN NECESSARY SUBCONTRACTORS & SUPPLIERS WITHOUT THE WRITTEN CONSENT OF BENCHMARK CIVIL/ENVIRONMENTAL ENGINEERING & GEOLOGY, PLLC & TURNKEY ENVIRONMENTAL RESTORATION, LLC.*