



Revised
March 17, 2021

Megan Kuczka
Division of Environmental Remediation
New York State Department of Environmental Conservation
270 Michigan Ave.
Buffalo, New York, 14203

**Re: Corrective Measure Work Plan for Partial Site Change of Use
Former Buffalo China Site C915209**

Dear Ms Kuczka,

Pursuant to the Brownfield Cleanup Agreement Index #B9-0732-06-11 between Buffalo China, Inc. and the New York State Department of Environmental Conservation (NYSDEC) and the Site Management Plan (SMP) prepared for the Former Buffalo China Site, LiRo Engineers, Inc. (LiRo) on behalf of Hayes Place Management Group, Inc. (HPMG) (current owner) is submitting this Corrective Measure Work Plan to convert a portion of the Site from Industrial Use to Commercial Use. The site is currently restricted to Industrial Use.

Background

The Site is a 9.73-acre property located in a mixed residential and industrialized area of Buffalo, New York. A previous Site owner entered into a Brownfield Cleanup Agreement with NYSDEC and a remedial investigation (RI) was conducted between July 2007 and July 2009. The results of the RI were reported in the "Remedial Investigation Report" prepared by Conastoga Rovers and Associates dated September 2010. Based upon investigations conducted as part of the RI, the primary contaminants of concern included trichloroethene (TCE) and its associated degradation products in soil and groundwater, as well as lead contaminated soil in the western portion of the Site. Remedial Actions were completed to address contaminated soil and a Final Engineering Report/Site Management Plan was completed in 2012. Groundwater treatment has continued in the western portion of the Site.

The attached Figure shows the location of the remedial areas and the portion of the site that is the subject of the Change of Use. As shown on the Figure, the Change of Use area is in the easternmost portion of the Site. The site remediation was focused in the western portion of the Site based on the distribution of contamination at the Site.

Conversion of Area for Commercial Use

The area to be converted for commercial use is entirely within the building footprint. The entire area is already covered by the building floor slab and formerly was the Buffalo China warehouse area. In advance of the conversion, HPMG removed any equipment present in the area and pressure-washed the floor and walls.



Additional Supporting Studies

Additional studies to be completed in support of the Change of Use will include:

- 1 – A Soil vapor Intrusion (SVI) investigation will be completed as described below.
- 2 – A summary of existing RI/Site data – Historical soil data from sampling locations in the eastern portion of the Site will be compiled and compared to commercial soil cleanup objectives. In addition, historical groundwater data from monitoring wells proximal to the Change of Use area will be compiled
- 3 – The compiled data referenced above will be used to prepare an updated human exposure assessment specific to commercial use of the area.

Soil Vapor Intrusion Investigation

For the SVI investigation, LiRo will obtain and deploy five Summa Canisters with 8-hour regulators to collect sub-slab, indoor air and outdoor air samples from the Site, in accordance with New York State Department of Health (NYSDOH) Guidance for Evaluating Soil Vapor Intrusion in the State of New York, October 2006, protocols. Prior to sampling, LiRo will conduct product survey to document sources of volatile chemicals present inside the building and will stage any moveable containers with potential VOCs to a secure location in a separate building area or at least 25 feet downwind from any sample location. At time of deployment, canister pounds per square inch (PSI) readings will be noted for each location. After approximately 8-hours of sample collection, canister valves will be closed and samples will be submitted for analysis of volatile organic compounds (VOCs) using USEPA Method TO-15. Time of valve closure, PSI reading at time of closure and canister status will be noted for each location.

Two sub-slab locations will be sampled with paired indoor air at the approximate locations shown on the attached Figure. Each sub-slab sampling location port will be constructed as a temporary sampling point and will be backfilled with hydraulic cement after sampling. Each sub-slab location will have a sample hole drilled up to 2-inches below the bottom of concrete floor slab into the sub-base. Tubing will be placed through each hole and sealed with an inert sealant (i.e., beeswax or hydraulic cement) at the floor surface. One to three implant volumes (i.e., the volume of the sample tube) will be purged prior to collecting the samples using a hand-held photo-ionization detector (PID) acting as a low volume pump. A Summa canister will be immediately connected to the sample hose and activated. Co-located Summa canisters for indoor air sampling will be set up with the inlet approximately three to four feet above floor level. One Summa canister will be set up outside of the immediate building area as shown on the attached Figure. The outdoor canister will be situated three to four feet above ground and filled concurrently with the indoor air/sub-slab vapor samples.

Summa canister samples will be analyzed for Volatile Organic Compounds (VOCs) using USEPA Method TO-15 by a laboratory certified under the NYSDOH Environmental Laboratory Accreditation Program. Results will be summarized and compared to NYSDOH Vapor Intrusion Guidance Document Matrix values (where available).



Scheduling for Easement and SMP updates

The SVI sampling will be conducted by March 31, 2021. We anticipate approximately four to six weeks for laboratory turnaround of results and completion of a Data Usability Summary Report. The supporting studies will be completed concurrently and a report with proposals for any warranted changes to the engineering or institutional controls currently being employed at the site will be completed by May 21, 2021. Upon acceptance of the changes with NYSDEC, HPMG's legal representative will work with NYSDEC Albany on amending and recording a revised easement.

Should you require any additional information or wish to discuss our CWMP in more detail, please contact me directly at 716-882-5476 x423 or by email at franks@liro.com.

Sincerely,

LiRo Engineers, Inc.

A handwritten signature in dark ink that reads "Stephen Frank". The signature is written in a cursive, flowing style.

Stephen Frank, PG
Senior Geologist

Cc
Scott Brady – Hayes Place Management Group, Inc.
Kevin Callahan – Hayes Place Management Group, Inc.

Attachment

