



**INVENTUM ENGINEERING**

June 22, 2020

Megan Kucka  
Environmental Program Specialist 1  
New York State Department of Environmental Conservation  
270 Michigan Avenue  
Buffalo, New York 14203-2915

RE: Closure Plan  
Storm Sewer  
Buffalo Color Area E – Site No. C915232  
Buffalo, New York

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Dear Ms. Kucka:

Inventum Engineering P.C. (Inventum) on behalf of South Buffalo Development Corporation, LLC (SBD) the current owner of portions of the former Buffalo Color Corporation (BCC) property has prepared this closure plan for the remaining storm sewers on the Area E Site at 100 Lee Street. SBD would like to permanently close the sewers as part of the redevelopment of this property. The COVID-19 Pandemic and associated Executive Orders from Governor Cuomo have affected the ability to define the start date, but the scope and durations are presented herein; please consider this the 60-day notice. The closure will include those portions of the storm sewer system on Area E. SBD has no access to or ability to close the sewer systems on the PVS Properties.

The sewers that will be filled are shown in yellow, blue, purple and red highlights on Figure 1.

*481 Carlisle Drive  
Suite 202  
Herndon, Virginia 20170*

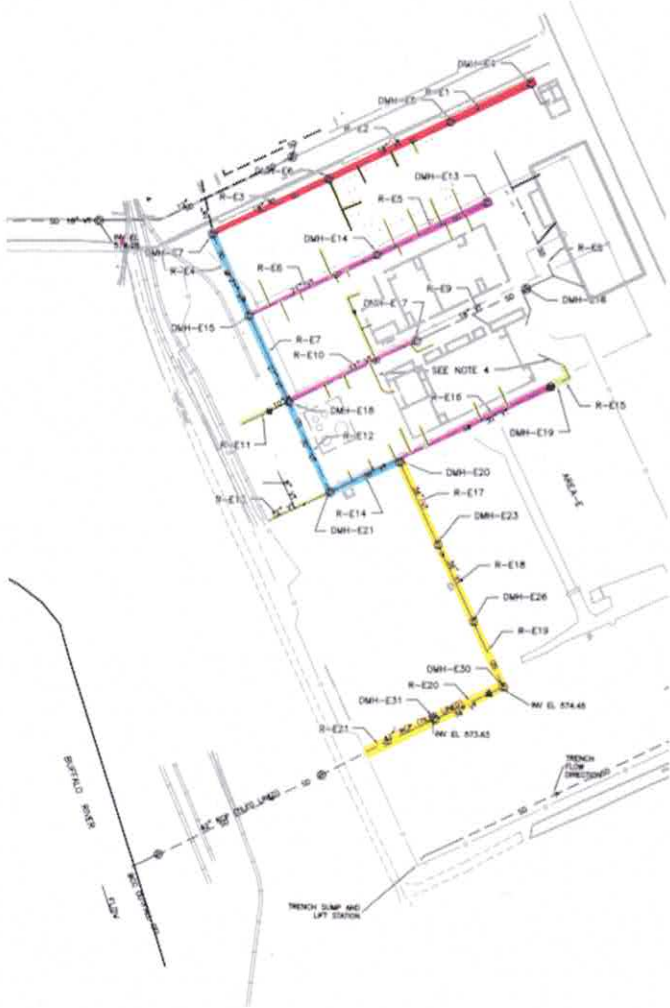


Figure 1

**Storm Sewer System – Area E**

The closure of storm sewer will be accomplished by completing the following activities:

1. Elimination of the flow to the outfall through the construction of the stormwater management systems for the Phase 2 Athletic complex. Flow will be redirected to the Buffalo Sewer Authority in accordance with a BSA permit.
2. Clearing access to the locations of each manhole along the system;
3. Removing the manhole covers and rings (All metal will be recycled offsite, brick and mortar will be recycled on site or disposed offsite as C&D);
4. Setting warning barriers around the pipe openings;
5. Setting a temporary plug at the lowest accessible location within each pipe, but no further than the boundary of Area E;
6. Sealing the pipes by filling with flowable fill (fine aggregate concrete);
7. Checking fill after 40 hours to confirm that as the concrete cured the pipes and inlets remain sealed; and



8. Documenting and certifying that the pipes are sealed.

All surface and stormwater will be managed in accordance with the City of Buffalo requirements. Sampling in accordance with the City of Buffalo permit will be submitted with the next PRR. The existing sampling point will be sealed and no sample collection from that location will be possible.

Closure of the existing storm sewer system will be initiated after the Phase 2 stormwater system is installed and functioning to convey stormwater to the BSA system. The schedule will include:

- Clearing any loose materials around the manholes - 2 Days
- Removal of the manhole covers and rings - 2 Days
- Removal of the manhole lining to an elevation 6-inches below the base of the cover system - 5 Days
- Setting plugs at the downstream sections to be sealed (unless previously sealed) - 5 Days
- Filling the piping with flowable fill (subject to availability of trucking)- 5 Days
- Inspection - 2 Days

Total time frame estimated to be 21 business days.

Please let me know if you have any questions or comments ([john.black@inventumeng.com](mailto:john.black@inventumeng.com) or 571.217.6761).

Respectfully submitted,

  
John P. Black, P.E.  
Partner

Cc: Jon Williams  
John Yensan





## Attachment A

### 6 CRR-NY 750-2.11

### NY-CRR

OFFICIAL COMPILATION OF CODES, RULES AND REGULATIONS OF THE STATE OF NEW YORK  
TITLE 6. DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
CHAPTER X. DIVISION OF WATER RESOURCES  
SUBCHAPTER A. GENERAL  
ARTICLE 3. STATE POLLUTANT DISCHARGE ELIMINATION SYSTEM  
PART 750. STATE POLLUTANT DISCHARGE ELIMINATION SYSTEM (SPDES) PERMITS  
SUBPART 750-2. OPERATING IN ACCORDANCE WITH A SPDES PERMIT AND POSS REGISTRATION

6 CRR-NY 750-2.11

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750-2.11 Closure requirements for disposal systems.

(a) This section applies to any and all disposal systems permanently removed from use or operation at SPDES permitted facilities or at facilities for which a SPDES permit has been revoked or an application for renewal denied, unless a judicial or administrative stay is in effect. The intent of this section is to protect public safety and health and to assure that no contamination of ground or surface water will occur as a result of removing such systems from service either through the act of closure or through continuing the discharge of pollutants into or through equipment; or through leaking, leaching, or discharge of pollutants from wastewater or residuals remaining in disposal systems which has been removed from use but remains on site.

(b) The *closure of a disposal system* means either the termination of the source of wastewater or storm water, or the permitted conveyance of wastewater or storm water to an alternate location (such as a regional facility) in such a manner that no further treatment storage or conveyance of wastewater or storm water is performed by the system.

(c) Disposal system closures shall conform with the following procedures:

(1) On or before 60 calendar days prior to taking the system out of service a permittee shall:

(i) submit to the regional water engineer the following information concerning closure activities:

(a) the date the system will cease operation;



(b) the date the influent and effluent pipes will be sealed;

(c) plans (signed and sealed by a New York State licensed professional engineer) for final disposition of the physical facilities, including all treatment units, outfall line, and all mechanical and electrical equipment and piping;

(d) plans (signed and sealed by a New York State licensed professional engineer) for elimination of all equipment and/or conditions that could possibly pose a safety hazard, either during or after shut-down of operations;

(e) verification that there are no lines in the collection system which are cross connected (receiving both sanitary and storm water) or which do not contain adequate conveyance capacity;

(f) the name of the licensed individual responsible for the maintenance and operation of the wastewater pumping station and/or disposal system systems that are still to be maintained; and

(ii) notify the regional water engineer, in writing, concerning any deactivated lagoons or other actual or potential discharges to ground water which may exist at the site.

(2) Proper management and/or removal of all residual materials (collected grit and screenings, scums, sand bed material, and dried or liquid sludges), as well as filter media, and all other solids from the treatment process that may remain in the abandoned treatment works is required.

(i) The permittee shall submit to the regional water engineer proof of ownership of or contractual arrangement with an operation or operations permitted to manage all such waste materials. A contract with a hauler will only be accepted as proof of proper waste management if documentation of management at an approved site or sites is included. In addition, all necessary State or Federal permits/approvals must accompany the submission.

(ii) All residual material shall be removed within 180 calendar days after the system is taken out of service. Proof of proper residuals management shall be submitted to the regional water engineer within 30 calendar days after their removal. The dates of removal and quantities removed shall be specified.

(d) Upon satisfaction of closure requirements specified in subdivision (c) of this section, the regional water engineer shall be contacted, in writing, to schedule a final site inspection of any disposal system which had a SPDES discharge permit to verify that influent and effluent pipes have been sealed and that all solid and residual materials related to the treatment process have been removed.

