



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: Supplemental Remedial Measures
Monitoring Well 32A
Buffalo Color Area E – Site No. C915232
Buffalo, New York

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 supplemental remedial measures plan for Monitoring Well MW-32A on the Area E Site at 100 Lee Street. MW-32A is the only monitoring well on Area E producing samples with significant concentrations of site constituents of concern. Three other wells (RFI-29, MW-E05 and RFI-36) produce samples with slight exceedances. During the Phase 2 redevelopment of the site, the soils in the area immediately north west of the monitoring well will be excavated to the groundwater surface and treated with Oxygen Release Compound (ORC), consistent with the remedial action that caused the cleanup of the rest of the site. ORC socks will be placed in RFI-29, MW-E05 and RFI-36 as a polishing step.

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.

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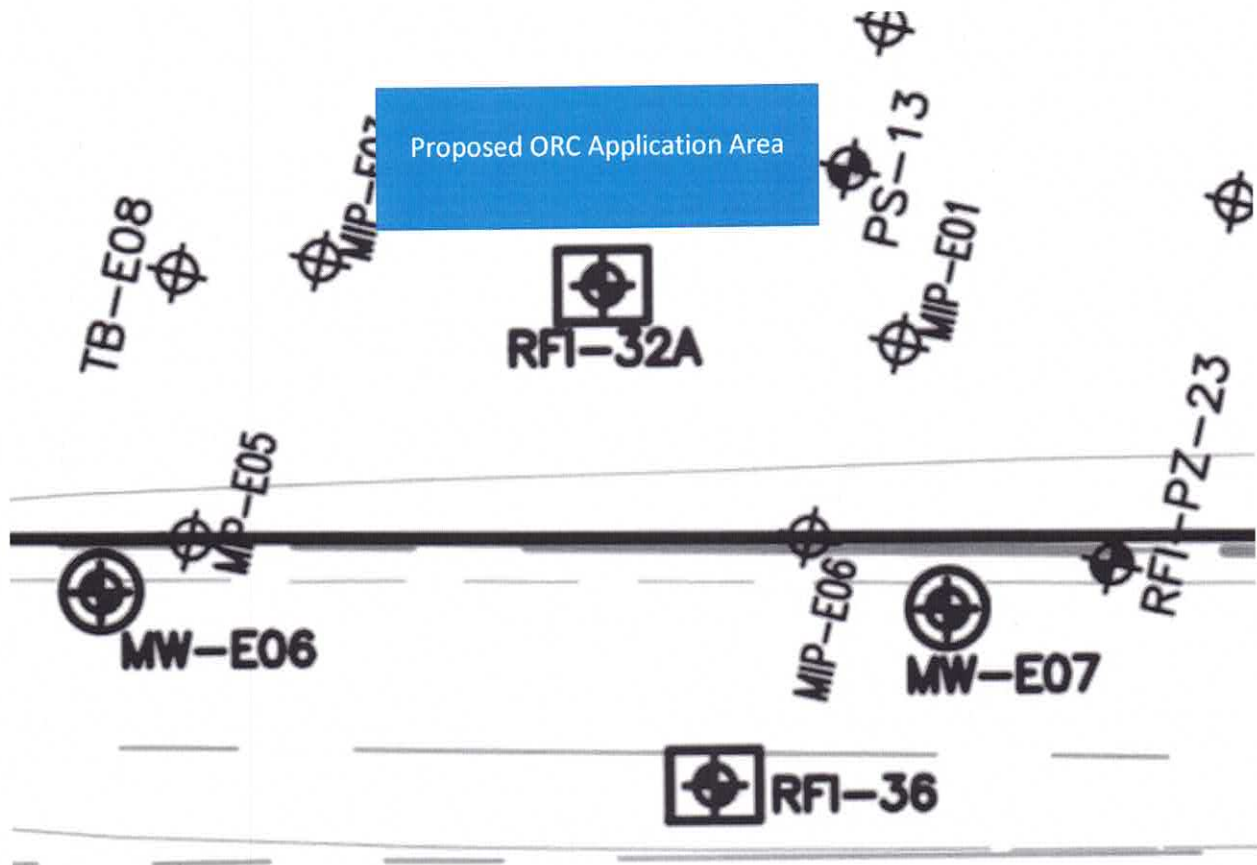


Figure 1
RFI-32A Location

The acceleration of the ongoing remediation of the groundwater at this location will be accomplished by completing the following activities:

1. Notifying Dig Safely New York (811) of the excavation;
2. Removal of the topsoil and clean covering soils;
3. Excavation of the treatment area (Figure 1) to the groundwater surface (Based on MW-32A depth to water measurements);
4. Setting warning barriers around the excavation;
5. Any concrete or foundation materials encountered will be recycled on site or transported offsite for disposal as C&D;
6. Blending 400 pounds of ORC into the top six inches of the excavation base (into the groundwater surface);
7. Replacing the excavated soils to the base of the Phase 2 cover system;
8. Placing ORC socks in RFI-29, MW-E05, RFI 32A, and RFI-36;
9. Suspending groundwater monitoring for 6-months to allow the ORC socks and blended ORC to stimulate bioremediation;



10. Removing the ORC socks after 5 months (Spent ORC solids will be properly disposed offsite); and
11. Resuming groundwater monitoring no sooner than 30 days after the ORC socks have been removed.

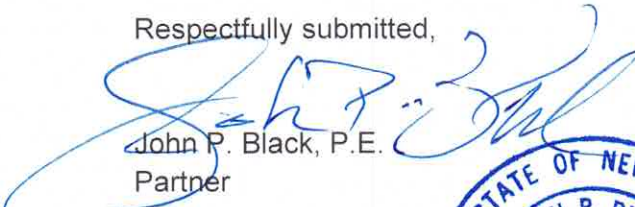
The supplemental remedial action will be initiated after the Phase 2 site development is restarted. The schedule will include:

- Procure ORC - 10 Days
- Call Dig Safely (811) - 4 Days
- Clearing clean surface soils - 1 Day
- Excavate to the groundwater surface - 3 Days
- Blending ORC - 2 Days
- Setting ORC Socks - 1 Day
- Initial supplemental treatment period - 5 Months
- Pull ORC Socks - 1 Days
- Resume sampling - After 30 Days

Total time frame estimated to be 7 months to reinitiating sampling. Development of a strong bioremediation environment in the vicinity of MW-32A could take as much as 12 months.

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

Respectfully submitted,


John P. Black, P.E.
Partner

Cc: Jon Williams
John Yensan

