

# DECISION DOCUMENT

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1155 Niagara Street Site  
Brownfield Cleanup Program  
Buffalo, Erie County  
Site No. C915367  
June 2022



**Department of  
Environmental  
Conservation**

Prepared by  
Division of Environmental Remediation  
New York State Department of Environmental Conservation

# **DECLARATION STATEMENT - DECISION DOCUMENT**

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1155 Niagara Street Site  
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Site No. C915367  
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## **Statement of Purpose and Basis**

This document presents the remedy for the 1155 Niagara Street Site a brownfield cleanup site. The remedial program was chosen in accordance with the New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 375.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the 1155 Niagara Street Site and the public's input to the proposed remedy presented by the Department.

## **Description of Selected Remedy**

The elements of the selected remedy are as follows:

### **1. Remedial Design**

A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows:

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse gases and other emissions;
- Increasing energy efficiency and minimizing use of non-renewable energy;
- Conserving and efficiently managing resources and materials;
- Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;
- Maximizing habitat value and creating habitat when possible;
- Fostering green and healthy communities and working landscapes which balance ecological, economic and social goals; and
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development;

Additionally, to incorporate green remediation principles and techniques to the extent feasible in the future development at this site, any future on-site buildings will include, at a minimum, a 20-mil vapor barrier/waterproofing membrane on the foundation to improve energy efficiency as an element of construction.

## 2. Excavation

Excavation and off-site disposal of on-site soils which exceed Commercial Soil Cleanup Objectives (CSCOs), as defined by 6 NYCRR Part 375-6.8. All soils in the upper foot which exceed the CSCOs will be excavated and transported off-site for disposal. Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to complete the backfilling of the excavation (as needed) and establish design grades at the site. On-site soil which does not exceed the above excavation criteria may be used below the cover system described in remedial element 3 to backfill the excavation to the extent that a sufficient volume of on-site soil is available. The site will be regraded to accommodate installation of a cover system as described in remedial element 3.

## 3. Cover System

A site cover will be required to allow for commercial use of the site in areas where the upper one foot of exposed surface soil will exceed the applicable SCOs. Where a soil cover is to be used it will be a minimum of one foot of soil placed over a demarcation layer, with the upper six inches of soil of sufficient quality to maintain a vegetative layer. Soil cover material, including any fill material brought to the site, will meet the SCOs for cover material for the use of the site as set forth in 6 NYCRR Part 375-6.7(d). Substitution of other materials and components may be allowed where such components already exist or are a component of the tangible properly to be placed as part of site redevelopment. Such components may include, but are not necessarily limited to: pavement, concrete, paved surface parking areas, sidewalks, building foundations and building slabs.

## 4. Supplemental Groundwater Investigation

Further assessment of Volatile Organic Compound (VOC) groundwater impacts within the northeastern site boundary, and vicinity of groundwater monitoring well 4, will be completed as part of the remedial work for the site. If the results of the groundwater assessment indicate additional remedial action is required, details for groundwater treatment will be provided to the Department for review and approval. The details for completing the assessment, and treating the groundwater if necessary, will be provided in a remedial action work plan.

## 5. Institutional Controls

Imposition of an institutional control in the form of an environmental easement and a Site Management Plan (SMP), as described below, will be required. The remedy will achieve a Track 4 commercial cleanup at a minimum.

Institutional Controls:

Imposition of an institutional control in the form of an environmental easement for the controlled property which will:

- require the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- allow the use and development of the controlled property for commercial or industrial use as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- restrict the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County Department of Health; and
- require compliance with the Department approved SMP.

6. Site Management Plan (SMP)

A SMP is required, which includes the following:

A. An Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and engineering controls remain in place and effective:

Institutional Controls: the environmental easement discussed in the "Institutional Controls" section of remedial element 5.

Engineering Controls: the site cover system discussed in remedial element 3.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- descriptions of the provisions of the environmental easement including any land use or groundwater use restrictions;
- a provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in remedial element 3 above will be placed in any areas where the upper one foot of exposed surface soil exceed the applicable SCOs;
- provisions for the management and inspection of the identified engineering controls;
- maintaining site access controls and Department notification; and
- the steps necessary for the periodic reviews and certification of the institutional and engineering controls.

B. a Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:

- monitoring of the site cover and groundwater to assess the performance and effectiveness of the remedy; and

- a schedule of monitoring and frequency of submittals to the Department;

**Declaration**

The remedy conforms with promulgated standards and criteria that are directly applicable, or that are relevant and appropriate and takes into consideration Department guidance, as appropriate. The remedy is protective of public health and the environment.

June 8, 2022

Date



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Michael Cruden, Director  
Remedial Bureau E

# DECISION DOCUMENT

1155 Niagara Street Site  
Buffalo, Erie County  
Site No. C915367  
June 2022

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## SECTION 1: SUMMARY AND PURPOSE

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), has selected a remedy for the above referenced site. The disposal of contaminants at the site has resulted in threats to public health and the environment that would be addressed by the remedy. The disposal or release of contaminants at this site, as more fully described in this document, has contaminated various environmental media. Contaminants include hazardous waste and/or petroleum.

The New York State Brownfield Cleanup Program (BCP) is a voluntary program. The goal of the BCP is to enhance private-sector cleanups of brownfields and to reduce development pressure on "greenfields." A brownfield site is real property, where a contaminant is present at levels exceeding the soil cleanup objectives or other health-based or environmental standards, criteria or guidance, based on the reasonably anticipated use of the property.

The Department has issued this document in accordance with the requirements of New York State Environmental Conservation Law and 6 NYCRR Part 375. This document is a summary of the information that can be found in the site-related reports and documents.

## SECTION 2: CITIZEN PARTICIPATION

The Department seeks input from the community on all remedies. A public comment period was held, during which the public was encouraged to submit comment on the proposed remedy. All comments on the remedy received during the comment period were considered by the Department in selecting a remedy for the site. Site-related reports and documents were made available for review by the public at the following document repositories:

DECInfo Locator - Web Application  
<https://gisservices.dec.ny.gov/gis/dil/index.html?rs=C915367>

Buffalo & Erie County Public Library  
Attn: April Tompkins  
1 Lafayette Square  
Buffalo, NY 14203  
Phone: (716) 858-8900

Isaias Gonzalez-Soto Branch Library  
Attn: Jason Barone  
280 Porter Avenue  
Buffalo, NY 14201  
Phone: (716)882-1537

### **Receive Site Citizen Participation Information By Email**

Please note that the Department's Division of Environmental Remediation (DER) is "going paperless" relative to citizen participation information. The ultimate goal is to distribute citizen participation information about contaminated sites electronically by way of county email listservs. Information will be distributed for all sites that are being investigated and cleaned up in a particular county under the State Superfund Program, Environmental Restoration Program, Brownfield Cleanup Program and Resource Conservation and Recovery Act Program. We encourage the public to sign up for one or more county listservs at <http://www.dec.ny.gov/chemical/61092.html>

### **SECTION 3: SITE DESCRIPTION AND HISTORY**

#### **Location:**

The 3.67-acre site is located in a highly developed mixed-use area at 1155 Niagara Street in the city of Buffalo, Erie County. The site is bordered by West Ferry Street to the north, residential, commercial, and industrial properties to the south, Niagara Street to the West, and West Avenue to the east.

#### **Site Features:**

The site is currently vacant land covered by vegetation and gravel. The site was formerly developed with a manufacturing facility that has since been demolished.

#### **Zoning and Land Use:**

The site is zoned N-1S, mixed-use employment center, and is currently vacant land. Proposed redevelopment includes a media production facility.

#### **Past Use of the Site:**

The site was developed with numerous residential properties from at least 1899 until 1981. Specific operations included a vehicle garage/storage, a contractor's yard, and a blacksmith from 1925 to at least 1951. A factory, pipe shop, garage, storage facility and a dairy related manufacturing operation occupied portions of the site from 1951 until 1981. A series of underground storage tanks (USTs) have been removed from the site at various times throughout the site's history, including two former gasoline USTs, one former No. 2 fuel oil UST, one former refrigerant UST, and five former chemical aboveground storage tanks (ASTs).

#### **Site Geology and Hydrogeology:**

The site is located within the Erie-Ontario Lowlands, which is typified by little topographic relief, and gently slopes westward towards Lake Erie. According to the United States Department of Agriculture (USDA) Web soil survey, the majority of the site soils are characterized as Urban Land and Urban Land-Lima Complex (UrA). Previous investigations have identified fill material

on-site ranging from 1 to 9 feet below ground surface (fbgs), underlain by assumed native clays ranging from 3 to 12.5 fbgs.

Bedrock was encountered at depths ranging from 8.5 to 12.5 fbgs during previous investigations. Regional and local groundwater likely flows west toward the Niagara River, located less than 300 feet west of the site boundary. Local groundwater flow however may be influenced by subsurface features such as excavations, utilities, and localized fill conditions. Groundwater was encountered between 5 and 6 fbgs during previous investigations.

A site location map is attached as Figure 1.

#### **SECTION 4: LAND USE AND PHYSICAL SETTING**

The Department may consider the current, intended, and reasonably anticipated future land use of the site and its surroundings when evaluating a remedy for soil remediation. For this site, alternatives (or an alternative) that restrict(s) the use of the site to commercial use (which allows for industrial use) as described in Part 375-1.8(g) were/was evaluated in addition to an alternative which would allow for unrestricted use of the site.

A comparison of the results of the Remedial Investigation (RI) to the appropriate standards, criteria and guidance values (SCGs) for the identified land use and the unrestricted use SCGs for the site contaminants is available in the RI Report.

#### **SECTION 5: ENFORCEMENT STATUS**

The Applicant(s) under the Brownfield Cleanup Agreement is a/are Volunteer(s). The Applicant(s) does/do not have an obligation to address off-site contamination. However, the Department has determined that this site does not pose a significant threat to public health or the environment; accordingly, no enforcement actions are necessary.

#### **SECTION 6: SITE CONTAMINATION**

##### **6.1: Summary of the Remedial Investigation**

A remedial investigation (RI) serves as the mechanism for collecting data to:

- characterize site conditions;
- determine the nature of the contamination; and
- assess risk to human health and the environment.

The RI is intended to identify the nature (or type) of contamination which may be present at a site and the extent of that contamination in the environment on the site, or leaving the site. The RI reports on data gathered to determine if the soil, groundwater, soil vapor, indoor air, surface water or sediments may have been contaminated. Monitoring wells are installed to assess groundwater and soil borings or test pits are installed to sample soil and/or wastes identified. If other natural resources are present, such as surface water bodies or wetlands, the water and sediment may be



sampled as well. Based on the presence of contaminants in soil and groundwater, soil vapor is also sampled for the presence of contamination. Data collected in the RI influence the development of remedial alternatives. The RI report is available for review in the site document repository and the results are summarized in section 6.3.

The analytical data collected on this site includes data for:

- groundwater
- soil
- soil vapor

#### **6.1.1: Standards, Criteria, and Guidance (SCGs)**

The remedy must conform to promulgated standards and criteria that are directly applicable or that are relevant and appropriate. The selection of a remedy must also take into consideration guidance, as appropriate. Standards, Criteria and Guidance are hereafter called SCGs.

To determine whether the contaminants identified in various media are present at levels of concern, the data from the RI were compared to media-specific SCGs. The Department has developed SCGs for groundwater, surface water, sediments, and soil. The NYSDOH has developed SCGs for drinking water and soil vapor intrusion. For a full listing of all SCGs see: <http://www.dec.ny.gov/regulations/61794.html>

#### **6.1.2: RI Results**

The data have identified contaminants of concern. A "contaminant of concern" is a contaminant that is sufficiently present in frequency and concentration in the environment to require evaluation for remedial action. Not all contaminants identified on the property are contaminants of concern. The nature and extent of contamination and environmental media requiring action are summarized below. Additionally, the RI Report contains a full discussion of the data. The contaminants of concern identified at this site is/are:

benzo(a)pyrene	copper
benzo(a)anthracene	dichlorodifluoromethane
benzo(b)fluoranthene	trichloromonofluoromethane
dibenz[a,h]anthracene	chrysene

The contaminants of concern exceed the applicable SCGs for:

- groundwater
- soil

#### **6.2: Interim Remedial Measures**

An interim remedial measure (IRM) is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before issuance of the Decision Document.

The following IRM has been completed at this site based on conditions observed during the RI.

### IRM Excavation

#### IRM - Excavation of Source Materials

An IRM was implemented to remove impacted source and fill materials in which contaminated concentrations exceeded CSCOs. The IRM excavation activities were performed between September 2021 and November 2021, and targeted materials impacted by petroleum, polycyclic aromatic hydrocarbons (PAHs) and metal compounds above the CSCO. The site excavation resulted in removal of approximately 8,722 tons of impacted soil-fill material from the site as part of the IRM process. Excavation depths were performed to a maximum of 12 fbgs. All impacted material removed from the site was properly handled and disposed of off-site at Waste Management's Chaffee Landfill, located in Chaffee, New York. Post excavation confirmatory samples verified that CSCOs were achieved through the IRM process. Sampling details and results can be found in the site's RI report.

### **6.3: Summary of Environmental Assessment**

This section summarizes the assessment of existing and potential future environmental impacts presented by the site. Environmental impacts may include existing and potential future exposure pathways to fish and wildlife receptors, wetlands, groundwater resources, and surface water. The RI report presents a detailed discussion of any existing and potential impacts from the site to fish and wildlife receptors.

The RI for the site was conducted in 2021 and included the sampling of near surface soil, subsurface soil/fill, groundwater, and soil vapor. Traditional surface soil samples were not obtained due to the site covering at the time of the RI, which consisted of non-organic construction and demolition materials, which was not suitable for long term cover material. Therefore, near surface soil, were sampled for proper characterization purposes. The data collected during the RI and prior site investigations identified limited Volatile Organic Compounds (VOCs), petroleum related Semi-Volatile Organic Compounds (SVOCs), select polycyclic aromatic hydrocarbons (PAHs), and metals above CSCOs, applicable action levels, or their respective New York State Ground Water Quality Standards (GWQS). Emergent contaminants (1,4-dioxane and per/polyfluoroalkyl substances (PFOA/PFAS)) were analyzed within soil and groundwater samples and evaluated against current New York State action and proposed guidance values.

#### Nature and Extent of Contamination:

##### Soil

##### Near Surface Soils:

21 near surface soil samples were collected between 1 and 2 fbgs and analyzed for VOCs, SVOCs, metals, herbicides/pesticides, PCBs, and emergent contaminants. No exceedances of the CSCOs

were identified for VOCs, metals, pesticides/herbicides, PCBs, or emergent contaminants in the analyzed samples.

SVOCs detected in near surface soil included benzo(a)pyrene at concentrations up to 3.8 parts per million (ppm) (CSCO 1.0 ppm).

#### Subsurface Soils:

26 subsurface soil samples were collected between 1 and 12 fbs and analyzed for VOCs, SVOCs, metals, herbicides/pesticides, PCBs, and emergent contaminants. No exceedances of the CSCOs were identified for VOCs, PCBs, pesticides/herbicides, or emergent contaminants in the analyzed samples.

SVOCs detected in subsurface soil included benzo(a)anthracene at concentrations up to 10 ppm (CSCO 5.6 ppm), benzo(a)pyrene up to 7.6 ppm (CSCO 1.0), benzo(b)fluoranthene up to 9.8 ppm (CSCO 5.6 ppm), and dibenzo(a,h,)anthracene up to 1.4 ppm (CSCO 0.56 ppm).

Metals detected in subsurface soil included copper at concentrations up to 501 ppm (CSCO 270 ppm).

#### Groundwater

On-site groundwater quality was sampled and analyzed through 5 groundwater monitoring wells and 1 temporary monitoring well. Samples were evaluated against the New York State GWQS. Groundwater was analyzed for VOCs, SVOCs, metals, herbicides/pesticides, PCBs, and emergent contaminants. No exceedances of the GWQS were identified for pesticides/herbicides or PCBs in the analyzed samples.

VOCs detected in groundwater included dichlorodifluoromethane up to 95 parts per billion (ppb) (GWQS 5 ppb), and trichlorofluoromethane up to 220 ppb (GWQS 5 ppb). These VOC compounds were identified in one upgradient groundwater monitoring well at the site. Downgradient monitoring results did not detect these VOCs and no specific source was found during subsurface investigations. Additionally, 1,2-dichloroethane was detected in one monitoring well up to 1.7 ppb (GWQS 0.6 ppb). All other monitoring wells did not detect this compound during sampling activities. A supplemental groundwater investigation will be performed as part of the remedy, as described in remedial element 4.

SVOCs detected in groundwater included benzo(a)anthracene up to 0.03 ppb (GWQS 0.002 ppb), and chrysene up to 0.02 ppb (GWQS 0.002 ppb).

Metals which were detected in groundwater were limited to naturally occurring minerals, including iron, magnesium, and sodium. No other metals were detected above their respective GWQS.

#### Emergent Contaminants in Groundwater:

Emergent contaminants were analyzed within the groundwater monitoring wells and found to be at concentrations which either minimally exceeded their respective action/threshold values and/or

were identified at select locations. Due to their limited presence, they are not considered a contaminant of concern.

1,4-dioxane was found within two groundwater monitoring wells at concentrations of 0.598 ppb and 2.74 ppb (New York State Maximum Contaminant Level 1 ppb). PFOA was identified above applicable drinking water standards in two monitoring wells, at concentrations of 14.7 parts per trillion (ppt) and 11.5 ppt (New York State Maximum Contaminant Level 10 ppt). PFOS was identified below applicable drinking water standards in one monitoring well, at concentration up to 4.98 ppt (New York State MCL 10 ppt).

#### Soil Vapor:

Soil vapor studies included the collection and testing of soil vapor samples from 5 locations within the site boundary. Samples were analyzed for VOCs to determine if soil vapor intrusion (SVI) concerns existed at the site. Soil vapor sampling results did not indicate a level of concern for potential soil vapor intrusion.

### **6.4: Summary of Human Exposure Pathways**

This human exposure assessment identifies ways in which people may be exposed to site-related contaminants. Chemicals can enter the body through three major pathways (breathing, touching or swallowing). This is referred to as *exposure*.

Access to the site is unrestricted. However, contact with contaminated soil or groundwater is unlikely unless they dig below the ground surface. Volatile organic compounds in the groundwater and/or soil may move into the soil vapor (air spaces within the soil), which may move into overlying buildings and affect the indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. Environmental sampling indicates that soil vapor intrusion is a concern for any future on-site redevelopment. Sampling indicates soil vapor intrusion is not a concern for off-site buildings.

### **6.5: Summary of the Remediation Objectives**

The objectives for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375. The goal for the remedial program is to restore the site to pre-disposal conditions to the extent feasible. At a minimum, the remedy shall eliminate or mitigate all significant threats to public health and the environment presented by the contamination identified at the site through the proper application of scientific and engineering principles.

The remedial action objectives for this site are:

#### **Groundwater**

##### **RAOs for Public Health Protection**

- Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.

### **RAOs for Environmental Protection**

- Remove the source of ground or surface water contamination.

### **Soil**

#### **RAOs for Public Health Protection**

- Prevent ingestion/direct contact with contaminated soil.
- Prevent inhalation of or exposure from contaminants volatilizing from contaminants in soil.

#### **RAOs for Environmental Protection**

- Prevent migration of contaminants that would result in groundwater or surface water contamination.

## **SECTION 7: ELEMENTS OF THE SELECTED REMEDY**

The alternatives developed for the site and the evaluation of the remedial criteria are presented in the Alternative Analysis. The remedy is selected pursuant to the remedy selection criteria set forth in DER-10, Technical Guidance for Site Investigation and Remediation and 6 NYCRR Part 375.

The selected remedy is a remedy.

The selected remedy is referred to as the Track 4 Commercial Use - Excavation and Cover System remedy.

The elements of the selected remedy, as shown in Figure 2, are as follows:

### **1. Remedial Design**

A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows:

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse gases and other emissions;
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- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development;

Additionally, to incorporate green remediation principles and techniques to the extent feasible in the future development at this site, any future on-site buildings will include, at a minimum, a 20-mil vapor barrier/waterproofing membrane on the foundation to improve energy efficiency as an element of construction.

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## 5. Institutional Controls

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Institutional Controls:

Imposition of an institutional control in the form of an environmental easement for the controlled property which will:

- require the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
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- require compliance with the Department approved SMP.

6. Site Management Plan (SMP)

A SMP is required, which includes the following:

A. An Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and engineering controls remain in place and effective:

Institutional Controls: the environmental easement discussed in the "Institutional Controls" section of remedial element 5.

Engineering Controls: the site cover system discussed in remedial element 3.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- descriptions of the provisions of the environmental easement including any land use or groundwater use restrictions;
- a provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in remedial element 3 above will be placed in any areas where the upper one foot of exposed surface soil exceed the applicable SCOs;
- provisions for the management and inspection of the identified engineering controls;
- maintaining site access controls and Department notification; and
- the steps necessary for the periodic reviews and certification of the institutional and engineering controls.

B. a Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:

- monitoring of the site cover and groundwater to assess the performance and effectiveness of the remedy; and

- a schedule of monitoring and frequency of submittals to the Department;



***Figure 1:***  
***Site Location Map***



***Figure 2:***  
***Site Boundary***



***Figure 3:***  
***Remedy Figure***





# COVER SYSTEM LAYOUT

RI / RM / AA REPORT  
1155 NIAGARA STREET SITE  
BCP SITE NO. C915367  
BUFFALO, NEW YORK  
PREPARED FOR  
GREAT POINT OPPORTUNITY FUND (A) GPOF, LLC



2005 HAWKINS TURNPIKE, SUITE 300, BUFFALO, NY 14204  
(716) 654-0999  
JOB NO. 05-50-020-001

THIS DOCUMENT IS THE PROPERTY OF BENCHMARK ENGINEERING & DESIGN, P.C. A STATEMENT OF ENVIRONMENTAL DESIGN FOR THE COVER SYSTEM LAYOUT IS PROVIDED FOR INFORMATION AND AS A GUIDE ONLY. THE DRAWING IS NOT TO BE USED FOR ANY OTHER PURPOSES WITHOUT THE WRITTEN CONSENT OF BENCHMARK ENGINEERING & DESIGN, P.C. A STATEMENT OF ENVIRONMENTAL DESIGN FOR THE COVER SYSTEM LAYOUT IS PROVIDED FOR INFORMATION AND AS A GUIDE ONLY. THE DRAWING IS NOT TO BE USED FOR ANY OTHER PURPOSES WITHOUT THE WRITTEN CONSENT OF BENCHMARK ENGINEERING & DESIGN, P.C.