July 28, 2015

Mr. Michael Hinton, P.E.
Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 9
270 Michigan Avenue
Buffalo, New York 14203-2999

Re: Addendum to the IRM Work Plan
402 and 430 Buffalo Avenue Site (C932164)

Dear Mr. Hinton:

On behalf of Merani Hospitality, Inc., Benchmark Environmental Engineering and Science, PLLC (Benchmark) in association with TurnKey Environmental Restoration, LLC (TurnKey), has prepared this Addendum to the NYSDEC-approved Interim Remedial Measures Work Plan (November 2014) to present the proposed scope of work and implementation procedures for completion of additional Interim Remedial Measures (IRMs) at the Brownfield Cleanup Program (BCP) 402 and 430 Buffalo Avenue Site (Site; C932164), located at 401, 402, and 430 Buffalo Avenue, Niagara Falls, New York (see Figures 1 and 2).

Merani Hospitality, Inc. completed RI activities at the Site between November 2014 and June 2015, and completed approved Interim Remedial Measures (IRMs) between April and July 2015. Based on the findings of the RI, an area of elevated radiologic slag-material was identified on the 402 Buffalo Avenue parcel and an area of lead-impacted soil/fill exceeding Industrial Use SCOs (ISCOs) was identified in the vicinity of TP-3 on the 430 Buffalo Avenue parcel (see Figure 3 and Table 3 from the RI-IRM-AA Report - draft July 2015, attached).

Merani Hospitaliy requests approval to immediately remediate both areas of contamination as IRMs, in accordance with the approved IRM Work Plan, and supporting documents including the Health and Safety Plan (HASP), Community Air Monitoring Plan (CAMP) and Radiologic Work Plan. Details for the planned IRMs are provided below.

The IRMs will be completed by Merani, and their designated subcontractors, with oversight provided by Benchmark-TurnKey. The work will be completed in general accordance with

6NYCRR Part 375 and New York State Department of Environmental Conservation (NYSDEC) DER-10 guidelines and the approved IRM Work Plan.

402 Buffalo Avenue – Radiologic Material IRM

During the RI, the entire BCP site was screened for radiologic material by a NYSDOH licensed radiologic subcontractor, Greater Radiologic Dimensions (GRD). An approximate 10,000 sq. ft. area of the 402 Buffalo Avenue asphalt covered parking lot was observed to have elevated field screen readings of up to 40,000 counts per minute (cpm). Elevated radiologic readings are apparently associated with the underlying slag-material to an approximate depth of one-foot below surface in the subbase of the asphalt cover. Approximatley 750 tons of slag material will be excavated, temporarily stockpiled, loaded and transported off-site for disposal at licensed disposal facility.

Prior to removal of elevated radiologic material, overlying asphalt will be stripped, screened for the presence of radiologic material, and transported off-site for recycling.

Radiologic field screening will be completed by a licensed radiologic materials subcontractor during excavation and loading activities. Post-removal clearance screenings will also be completed by a licensed radiologic materials subcontractor. Radiologic screening and disposal documentation will be provided in the Final Engineering Report (FER).

Figure 5 of the draft RI-IRM-AA Report identying the area of elevated radiologic screening results on the 402 Buffalo Avenue parcel is attached for reference.

430 BUFFALO AVENUE - TP-3 IRM

Based on the findings of the RI, lead-impacted soil/fill exceeding ISCOs was detected at sample location TP-3, ranging from 1-5 fbgs (see Table 3, attached).

The excavation will continue until post-excavation sample results are below 6NYCRR Part 375 Industrial Use Soil Cleanup Objectives (ISCOs), has reached practical extents including property boundary and presence of subgrade structures/utilities, or NYSDEC agrees that no further excavation is required.

Excavated non-hazardous soil/fill will be direct-loaded for off-site transportation by licensed hauler(s) and disposal at a permitted commercial disposal facility. Transportation and disposal documents will be included with the FER.

Post excavation confirmatory samples will be collected from the TP-3 excavation sidewalls and bottom in accordance with the DER-10 and the approved work plan. Post-excavation samples from the TP-3 IRM excavation will be collected and analyzed for Part 375 List SVOCs and and metals.

Confirmatory samples will be analyzed in accordance with USEPA methodology with an equivalent Category B deliverables package to facilitate data evaluation by a third-party validation expert. Expedited turnaround times may be requested for the analytical results to minimize the time that the excavation remains open.

Prior to backfilling, demarcation fabric will be installed on the excavation floor to distinguish remaining in-place material from the approved backfill.

ON-SITE SOIL REUSE

After completion of the IRMs, excavations will be backfilled with excess on-Site soil generated from the redevelopment activities on the 401 Buffalo Avenue parcel. Based on the results of the RI and successful completion of the planned IRMs, the 401 Buffalo Avenue parcel has achieved Residential Use SCOs across the entire 401 Buffalo Avenue parcel (see Table 4). As such, we are requesting approval to reuse excess soil from the redevelopment for backfill and surface cover material on the 402 and 430 Buffalo Avenue parcels, in accordance with DER-10

Benchmark-TurnKey will provide oversight of the redevelopment excavations to verify soil does not contain impacted materials. Any potentially impacted material will be segregated and characterized for determination of potential reuse, in consultation with the Department. If material is deemed unsuitable for reuse below the cover system, it will be transported off-site for disposal at permitted landfill. Excess soil from the 401 Buffalo Avenue parcel will be temporarily stockpiled on the 430 Buffalo Avenue parcel in accordance with the approved Soil/Fill Management Plan (SFMP).

Cover System details have been provided under separate cover as an attachment to the RI-IRM-AA Report (draft July 2015). The Cover System will not be installed until Departmental approval has been received.

REPORTING

Full details and documentation of the IRM activities will be included in the Final Engineering Report (FER). At a minimum, the IRM section of the report will include:

- A map showing the lateral limits of excavation;
- Summaries of unit quantities, including: volume of soil/fill excavated; disposition of excavated soil/fill and collected ground/surface water; volume/type/source of backfill; and volume of ground/surface water pumped and treated;
- Planimetric map showing location of all verification and other sampling locations with sample identification labels/codes;

- Tabular comparison of verification and other sample analytical results to SCOs. An explanation shall be provided for any results exceeding acceptance criteria; and

- Text describing that the excavation activities were performed in accordance with this Work Plan.

Please do not hesitate to contact us if you have any questions.

Sincerely,
TurnKey Environmental Restoration, LLC

Nathan Munley
Project Manager

Michael Lesakowski
Sr. Project Manager

cc: F. Merani (Merani Hospitality, Inc.)
C. Slater (Slater Law)
G. Sutton (NYSDEC)

File: 0294-013-001

ATTACHMENTS

TABLE 3

SUMMARY OF HISTORIC SUBSURFACE SOIL/FILL ANALYTICAL RESULTS

REMEDIAL INVESTIGATION / INTERIM REMEDIAL MEASURES / ALTERNATIVE ANALYSIS REPORT

402 and 430 BUFFALO AVENUE SITE

NIAGARA FALLS, NEW YORK

Parameter[1]	Unrestricted Use SCOs [2]	Restricted Residential Use SCOs [2]	Commercial Use SCOs [2]	Sample Locations							
				SB-1 (0-2)	SB-2 (6-8)	TP-1 (1-6)	TP-3 (1-4.5)	TP-4 (1-2)	TP-5 (1-3)	TP-6 (2-4)	TP-7 (2-4)
				10/3/2013		10/4/2013					
Volatile Organic Compounds (VOCs) - mg/Kg [3]											
Total VOCs	--	--	--	ND	ND	NA	NA	NA	NA	NA	NA
Semi-Volatile Organic Compounds (SVOCs) - mg/Kg [3]											
1,2,4-Trichlorobenzene	--	--	--	ND	ND	ND	ND	ND	ND	ND	ND
2-Methylnaphthalene	--	--	--	0.2 J	ND	ND	0.69 J	ND	ND	ND	ND
Acenaphthene	**20**	**100**	**500**	ND	ND	0.35	1.4	ND	2.2	0.046 J	0.052 J
Acenaphthylene	**100**	**100**	**500**	ND	ND	0.14 J	0.31 J	ND	2.2	ND	ND
Anthracene	**100**	**100**	**500**	0.042 J	ND	0.96	3.1	ND	9.8	ND	0.2
Benzo(a)anthracene	**1**	**1**	**5.6**	0.21	ND	**3.3**	**5.9**	0.1 J	**31**	0.14	0.47
Benzo(a)pyrene	**1**	**1**	**1**	0.19	ND	**2.9**	**5.1**	0.087 J	**30**	0.12 J	0.41
Benzo(b)fluoranthene	**1**	**1**	**5.6**	0.31	ND	**3.8**	**6.3**	0.12	**38**	0.16	0.53
Benzo(g,h,i)perylene	**100**	**100**	**500**	0.14 J	ND	1.8	3.1	0.061 J	18	0.077 J	0.22
Benzo(k)fluoranthene	**0.8**	**3.9**	**56**	0.095 J	ND	**1.4**	**2.5**	0.05 J	**14**	0.06 J	0.23
Bis(2-ethylhexyl) phthalate	--	--	--	ND	ND	ND	ND	ND	ND	ND	ND
Carbazole	--	--	--	ND	ND	ND	ND	ND	ND	ND	ND
Chrysene	**1**	**3.9**	**56**	0.31	ND	**3.2**	**5.7**	ND	**31**	0.15	0.47
Dibenzo(a,h)anthracene	**0.33**	**0.33**	**0.56**	ND	ND	**0.49**	**0.82**	ND	**5**	ND	0.069 J
Dibenzofuran	--	--	--	ND	ND	ND	ND	ND	ND	ND	ND
Fluoranthene	**100**	**100**	**500**	0.63	ND	6.8	12	0.18	68	0.27	0.93
Fluorene	**30**	**100**	**500**	ND	ND	0.4	1.4	ND	2.8	ND	0.061 J
Indeno(1,2,3-cd)pyrene	**0.5**	**0.5**	**5.6**	0.13 J	ND	**1.9**	**3.2**	0.059 J	**19**	0.082 J	0.24
Naphthalene	**12**	**100**	**500**	0.11 J	ND	0.16 J	1.9	ND	0.92 J	ND	ND
Phenanthrene	**100**	**100**	**500**	0.52	ND	4	11	0.094 J	29	0.17	0.65
Pyrene	**100**	**100**	**500**	0.5	ND	5.6	10	0.16	56	0.23	0.75
Total PCBs - mg/Kg [3]											
Aroclor 1248	--	--	--	NA	NA	ND	ND	NA	ND	NA	ND
Aroclor 1254	--	--	--	NA	NA	ND	ND	NA	ND	NA	ND
Aroclor 1260	**0.1**	**1**	**1**	NA	NA	ND	ND	NA	0.0284 J	NA	ND
Metals - mg/Kg											
Arsenic	**13**	**16**	**16**	7.2	1.1	9.6	8.9	NA	6	NA	6.3
Barium	**350**	**400**	**400**	64	12	**950**	**1000**	NA	**970**	NA	59
Cadmium	**2.5**	**4.3**	**9.3**	0.72	0.92	2.1	2.1	NA	1.8	NA	0.78
Chromium	**30**	**180**	**1500**	7.6	3	27	19	NA	8.9	NA	9.6
Lead	**63**	**400**	**1000**	**100**	23	**2700**	**6200**	NA	**2100**	NA	**130**
Selenium	**3.9**	**180**	**1500**	ND	ND	ND	ND	NA	ND	NA	ND
Silver	**2**	**8.3**	**1500**	0.12 J	ND	0.2 J	0.24 J	NA	0.22 J	NA	ND
Mercury	**0.18**	**0.73**	**2.8**	ND	ND	0.05 J	0.03 J	NA	0.17	NA	0.09

Notes:

1. Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.
2. Values per 6NYCRR Part 375 Soil Cleanup Objectives (December 2006).
3. Sample results were reported by the laboratory in ug/kg and converted to mg/kg for comparison to SCOs.

Definitions:

ND = Parameter not detected above laboratory detection limit.
NA = Sample not analyzed for parameter.
"--" = No SCO available for the parameter.
J = Estimated value; result is less than the sample quantitation limit but greater than zero.

BOLD	= Result exceeds Part 375 Unrestricted Use SCOs.
BOLD	= Result exceeds Part 375 Restricted Residential Use SCOs.
BOLD	= Result exceeds Part 375 Commercial Use SCOs.

TABLE 4

SUMMARY OF SURFACE SOIL ANALYTICAL RESULTS

REMEDIAL INVESTIGATION / INTERIM REMEDIAL MEASURES / ALTERNATIVE ANALYSIS REPORT

402 AND 430 BUFFALO AVENUE SITE

NIAGARA FALLS, NEW YORK

PARAMETER[1]	Unrestricted Use SCOs[2]	Restricted Residential Use SCOs[2]	Commercial Use SCOs[2]	SAMPLE LOCATION						
				SS-1	SS-2	SS-3	SS-4	SS-5	SS-6	SS-7
				2/9-10/2015						
Semi-Volatile Organic Compounds (SVOCs) - mg/Kg [3]										
Anthracene	**100**	**100**	**500**	0.082 J	0.076 J	ND	ND	ND	0.034 J	ND
Benzaldehyde	**--**	**--**	**--**	ND	ND	ND	ND	0.1 J	ND	0.077 J
Benzo(a)anthracene	**1**	**1**	**5.6**	0.23	0.24	0.12 J	0.042 J	0.051 J	0.11 J	0.059 J
Benzo(a)pyrene	**1**	**1**	**1**	0.22	0.23	0.14 J	ND	0.049 J	0.11 J	0.067 J
Benzo(b)fluoranthene	**1**	**1**	**5.6**	0.31	0.3	0.21	0.049 J	0.071 J	0.12	0.11
Benzo(ghi)perylene	**100**	**100**	**500**	0.13 J	0.13 J	0.093 J	ND	ND	0.062 J	0.058 J
Benzo(k)fluoranthene	**0.8**	**3.9**	**56**	0.13	0.14	0.091 J	ND	ND	0.055 J	0.04 J
Carbazole	**--**	**--**	**--**	0.048 J	0.047 J	ND	ND	ND	ND	ND
Chrysene	**1**	**3.9**	**56**	0.25	0.24	0.14	0.037 J	0.054 J	0.1 J	0.067 J
Fluoranthene	**100**	**100**	**500**	0.5	0.48	0.26	0.073 J	0.11	0.22	0.091 J
Indeno(1,2,3-cd)pyrene	**0.5**	**0.5**	**5.6**	0.15 J	0.14 J	0.1 J	ND	ND	0.063 J	0.061 J
Phenanthrene	**100**	**100**	**500**	0.34	0.34	0.15	ND	0.062 J	0.15	0.039 J
Phenol	**100**	**100**	**500**	ND	ND	ND	ND	0.3	ND	ND
Pyrene	**100**	**100**	**500**	0.39	0.39	0.21	0.059 J	0.087 J	0.19	0.079 J
Metals - mg/Kg										
Arsenic	**13**	**16**	**16**	9.5	**18**	8.9	4.9	5.6	12	2.6
Barium	**350**	**400**	**400**	86	60	65	6.7	6.8	66	13
Beryllium	**7.2**	**72**	**590**	0.52	0.32	0.45	0.07 J	0.06 J	0.31	ND
Cadmium	**2.5**	**4.3**	**9.3**	0.24 J	0.38 J	0.24 J	0.94	0.28 J	0.6	1.3
Chromium	**30**	**180**	**1500**	**34**	14	23	3	2.8	16	2.4
Copper	**50**	**270**	**270**	18	16	14	3.5	3.6	16	4.2
Lead	**63**	**400**	**1000**	29	**78**	24	41	36	**96**	42
Manganese	**1600**	**2000**	**10000**	490	380	660	440	510	630	460
Mercury	**0.18**	**0.81**	**2.8**	0.17	**0.21**	0.14	0.04 J	0.02 J	**0.24**	0.06 J
Nickel	**30**	**310**	**310**	17	21	12	3	2.6	11	2.6
Selenium	**3.9**	**180**	**1500**	0.34 J	0.27 J	0.17	0.24 J	0.22 J	0.29 J	ND
Silver	**2**	**180**	**1500**	ND	ND	ND	0.1 J	ND	0.11 J	ND
Zinc	**109**	**10000**	**10000**	85	99	77	**280**	82	**200**	**410**
Polychlorinated biphenyls (PCBs) - mg/Kg [3]										
Aroclor 1248	**--**	**--**	**--**	**--**	ND	ND	**--**	0.0128 J	**--**	**--**
Total PCBs	**0.1**	**1**	**1**	**--**	ND	ND	**--**	0.0128 J	**--**	**--**
Pesticides and Herbicides - mg/Kg [3]										
4,4'-DDT	**0.0033**	**7.9**	**47**	**--**	**--**	0.00228 J	**--**	ND	**--**	**--**

Notes:

1. Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.
2. Values per 6NYCRR Part 375 Soil Cleanup Objectives (SCOs).
3. Sample results were reported by the laboratory in ug/kg and converted to mg/kg for comparisons to SCOs.

Definitions:

ND = Parameter not detected above laboratory detection limit.
"--" = No value available for the parameter; Parameter not analysed for.
J = Estimated value; result is less than the sample quantitation limit but greater than zero.

Bold	= Result exceeds Unrestricted Use SCOs.
Bold	= Result exceeds Restricted Residential Use SCOs.
Bold	= Result exceeds Commercial Use SCOs.

TABLE 5

SUMMARY OF SUBSURFACE SOIL/FILL ANALYTICAL RESULTS

REMEDIAL INVESTIGATION / INTERIM REMEDIAL MEASURES / ALTERNATIVE ANALYSIS REPORT

402 AND 430 BUFFALO AVENUE SITE

NIAGARA FALLS, NEW YORK

PARAMETER[1]	Unrestricted Use SCOs [2]	Restricted Residential Use SCOs [2]	Commercial Use SCOs [2]	SAMPLE LOCATION (DEPTH)																														
				TP-10 (2-16')	TP-11 (1-3')	TP-12 (6-8')	TP-13 (1-3')	TP-14 (4-10')	TP-15 (2-4')	TP-16 (4-14')	TP-17 (2-15')	TP-18 (1-8')	TP-19 (1-3')	TP-20 (1-3')	TP-22 (1-3')	TP-23 (1-16')	TP-24 (1-4')	TP-25 (1-4')	TP-26 (1-3')	TP-27 (2-12')	TP-28 (1-4')	TP-29 (1-4')	SB-17 (5-16')	SB-18 (0.5-3')	MW-3 (2-8')	SB-19 (3-12')	MW-5 (2-8')	SB-16 (1-7')	SB-14 (4-12')	SB-12 (1-8')	SB-12 (13-16')	SB-7 (1-5')	SB-8 (8-10')	SB-11 (1-16')
				2/10/2015	2/9/2015						2/10/2015		2/10/2015	2/9/2015	2/11/2015				2/10/2015				2/24/2015		4/15/2015	2/25/2015	4/14/2015	2/25/2015						
Volatile Organic Compounds (VOCs) - mg/Kg [3]																																		
1,2,4-Trimethylbenzene	**3.6**	**52**	**190**	--	ND	--	ND	ND	--	--	ND	ND	--	--	--	ND	ND	--	ND	ND	--	--	--	ND	ND	--	ND	--	ND	--	--	--	1.4	--
1,3,5-Trimethylbenzene	**8.4**	**52**	**190**	--	ND	--	ND	ND	--	--	ND	ND	--	--	--	ND	ND	--	ND	ND	--	--	--	ND	ND	--	ND	--	ND	--	--	--	0.71 J	--
Acetone	**0.05**	**100**	**500**	--	ND	--	**0.061 J**	0.044 J	--	--	ND	ND	--	--	--	ND	0.011 J	--	ND	ND	--	--	--	0.0051 J	0.031	--	ND	--	0.0069 J	--	--	--	**0.44 J**	--
Cyclohexane	--	--	--	--	ND	--	ND	ND	--	--	ND	ND	--	--	--	ND	ND	--	ND	ND	--	--	--	ND	ND	--	ND	--	ND	--	--	--	0.43 J	--
Isopropylbenzene (Cumene)	--	--	--	--	ND	--	ND	ND	--	--	ND	ND	--	--	--	ND	ND	--	ND	ND	--	--	--	ND	ND	--	ND	--	ND	--	--	--	0.41	--
Methylcyclohexane	--	--	--	--	ND	--	ND	ND	--	--	ND	ND	--	--	--	ND	ND	--	ND	ND	--	--	--	ND	ND	--	0.00087 J	--	ND	--	--	--	2.4	--
n-Butylbenzene	**12**	--	--	--	ND	--	ND	ND	--	--	ND	ND	--	--	--	ND	ND	--	ND	ND	--	--	--	ND	ND	--	0.001 J	--	ND	--	--	--	1.1	--
n-Propylbenzene	**3.9**	**100**	**500**	--	ND	--	ND	ND	--	--	ND	ND	--	--	--	ND	ND	--	ND	ND	--	--	--	ND	ND	--	0.00082 J	--	ND	--	--	--	0.69	--
sec-Butylbenzene	**11**	**100**	**500**	--	ND	--	ND	ND	--	--	ND	ND	--	--	--	ND	ND	--	ND	ND	--	--	--	ND	ND	--	0.0055	--	ND	--	--	--	0.65	--
Tetrachloroethene	**1.3**	**19**	**150**	--	ND	--	ND	ND	--	--	ND	ND	--	--	--	ND	0.0012	--	0.00082 J	0.001 J	--	--	--	ND	ND	--	0.00038 J	--	ND	--	--	--	ND	--
Toluene	**0.7**	**100**	**500**	--	ND	--	ND	ND	--	--	ND	ND	--	--	--	ND	0.0011 J	--	ND	ND	--	--	--	ND	0.00028 J	--	0.00028 J	--	ND	--	--	--	ND	--
Trichloroethene	**0.47**	**21**	**200**	--	ND	--	ND	ND	--	--	ND	ND	--	--	--	ND	0.0012	--	0.00035 J	ND	--	--	--	ND	ND	--	ND	--	ND	--	--	--	ND	--
Total Xylenes	**0.26**	**100**	**500**	--	ND	--	ND	ND	--	--	ND	ND	--	--	--	ND	ND	--	ND	ND	--	--	--	ND	ND	--	0.00029 J	--	0.00065 J	--	--	--	0.058 J	--
Semi-Volatile Organic Compounds (SVOCs) - mg/Kg [3]																																		
2-Methylnaphthalene	--	--	--	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.4 J	ND	ND	0.48 J	0.84 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.22 J	ND
Benzo(a)anthracene	**1**	**1**	**5.6**	ND	ND	0.05 J	ND	ND	ND	ND	ND	ND	ND	ND	**7.7**	ND	**1.8**	**12**	**14**	0.039 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.054 J	ND	ND	ND	ND
Benzo(b)fluoranthene	**1**	**1**	**5.6**	ND	ND	0.071 J	ND	ND	ND	ND	ND	ND	ND	ND	**8.3**	ND	**2.2**	**15**	**16**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.048 J	ND	ND	ND	ND
Chrysene	**1**	**3.9**	**56**	ND	ND	0.057 J	ND	ND	ND	ND	ND	ND	ND	ND	**7.1**	ND	**1.6**	**12**	**13**	0.039 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.066 J	ND	ND	ND	ND
Dibenzofuran	**7**	**59**	**350**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.82 J	ND	0.088 J	1.2	1.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.17 J	ND
Fluoranthene	**100**	**100**	**500**	ND	ND	0.11	ND	ND	ND	ND	ND	ND	ND	0.042 J	15	ND	3.8	24	26	0.052 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.057 J	ND	ND	0.27	ND
Fluorene	**30**	**100**	**500**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.3	ND	ND	2.2	2.4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.19 J	ND
Phenanthrene	**100**	**100**	**500**	ND	ND	0.039 J	ND	ND	ND	ND	ND	ND	ND	ND	14	ND	1.8	17	23	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.046 J	ND	ND	ND	ND
Pyrene	**100**	**100**	**500**	ND	ND	0.09 J	ND	ND	ND	ND	ND	ND	ND	ND	13	ND	2.9	19	22	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.067 J	ND	ND	ND	ND
Total PAHs	--	--	--	--	--	0.468 J	--	--	--	--	--	--	--	0.042	93.65	--	21.685	160.2	168.44	0.13	--	--	--	--	--	--	--	--	--	0.338	--	--	0.85	--
Metals - mg/Kg																																		
Arsenic	**13**	**16**	**16**	4.6	5.2	2.9	6.4	4.3	4.1	4.3	4.9	4.3	5.3	4.9	10	3	9.5	5.1	13	3.9	3.3	2.7	3.8	4.4	4.2	3.1	--	7.1	3.1	11	4.2	2.8	3.8	3.8
Barium	**350**	**400**	**400**	18	66	21	34	22	18	29	10	9.3	43	47	**1400**	22	**780**	300	**1700**	53	17	17	15	36	52	18	--	48	15	110	96	13	15	10
Beryllium	**7.2**	**72**	**590**	0.19 J	0.41	0.13 J	30	0.14 J	0.16 J	0.17 J	0.18 J	0.18 J	0.33	0.33	0.19 J	0.16 J	0.27	0.22	0.41	0.25	0.15 J	0.15 J	0.2 J	0.36	0.33	0.17 J	--	0.32 J	0.14 J	0.18 J	0.38	0.08 J	0.16 J	0.24
Cadmium	**2.5**	**4.3**	**9.3**	0.07 J	0.77	0.59	0.28 J	0.98	0.24 J	0.3 J	0.13 J	0.07 J	0.12 J	0.49 J	1	0.07 J	1 J	0.49 J	1.1	0.14 J	0.5 J	0.49 J	0.08 J	0.17 J	0.1 J	0.17 J	--	0.84 J	0.14 J	0.16 J	0.23 J	0.93	0.11 J	0.11
Chromium	**30**	**180**	**1500**	6.5	11	**36**	8.2	5.4	5.8	6.2	5.8	6	11	16	15	6.1	11	10	18	8.7	5.2	5.1	6.6	10	11	6.2	--	9.5	5	3.5	13	3.9	5.6	7.4
Copper	**50**	**270**	**270**	6.6	16	7	8.8	8.2	6.2	7.1	8	6.8	9.5	20	81	5.6	28	14	97	9.3	8.1	9.6	6.6	9.2	11	6.7	--	15	6.6	11	17	12	6.5	7.2
Lead	**63**	**400**	**1000**	4.5	**73**	18	20	46	7.4	11	11	3.8	6.9	23	**2400**	4.2	**1100**	**320**	**2400**	9.9	39	33	5.4	16	18	7.2	--	**83**	14	43	9.8	39	6.7	6.7
Manganese	**1600**	**2000**	**10000**	340	870	380	660	390	360	360	340	380	290	260	320	330	320	260	320	360	550	400	410	260	420	470	--	700	380	330	420	410	360	440
Mercury	**0.18**	**0.81**	**2.8**	ND	0.1	0.02 J	0.12	0.03 J	ND	ND	0.02 J	ND	0.02 J	0.16	**0.29**	ND	**0.2**	**0.52 J**	**0.46**	ND	0.03 J	0.02 J	ND	0.06 J	ND	ND	--	0.17 J	ND	0.03 J	0.02 J	0.02 J	0.02 J	ND
Nickel	**30**	**310**	**310**	7.5	11	5.2	9.3	5.4	6.6	6.8	6.2	7.2	11	6.6	6.8	7.1	9.4	6.2	11	9.7	4.9	5.3	8.9	12	12	8.5	--	9.2	6	6.1	16	4.3	7.2	10
Silver	**2**	**180**	**1500**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.14 J	ND	0.13 J	ND	0.12 J	ND	ND	ND	ND	ND	ND	ND	--	0.14 J	ND	ND	ND	ND	ND	ND
Zinc	**109**	**10000**	**10000**	37	**300**	**140**	81	**200**	62	67	51	32	59	**110**	**2500**	36	**1000**	**320**	**2700**	70	**150**	**210**	38	76	**110**	60	--	**300**	50	44	95	**300**	41	52
Polychlorinated biphenyls (PCBs) - mg/Kg [3]																																		
Aroclor 1254	--	--	--	--	--	--	ND	ND	--	--	ND	ND	--	ND	--	ND	ND	--	ND	ND	--	--	ND	ND	0.0479	ND	ND	ND	ND	--	ND	--	ND	--
Total PCBs	**0.1**	**1**	**1**	--	--	--	ND	ND	--	--	ND	ND	--	ND	--	ND	ND	--	ND	ND	--	--	ND	ND	0.0479	ND	ND	ND	ND	--	ND	--	ND	--
Pesticides and Herbicides - mg/Kg [3]																																		
Chlordane	**0.094**	**4.2**	**24**	--	--	--	ND	ND	--	--			--	--	--		--	--	ND	ND	--	--	--	ND	0.0419	--	--	--	ND	--	--	--	ND	--
cis-Chlordane	--	--	--	--	--	--	ND	ND	--	--	ND	ND	--	--	--	ND	--	--	0.0513	ND	--	--	--	ND	0.00864	--	--	--	ND	--	--	--	ND	--
Heptachlor epoxide	--	--	--	--	--	--	ND	ND	--	--	ND	ND	--	--	--	ND	--	--	ND	ND	--	--	--	ND	0.00143 J	--	--	--	ND	--	--	--	ND	--
trans-Chlordane	--	--	--	--	--	--	ND	ND	--	--	ND	ND	--	--	--	ND	--	--	0.0435 P I	ND	--	--	--	ND	0.00601	--	--	--	ND	--	--	--	ND	--

Notes:

1. Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.
2. Values per 6NYCRR Part 375 Soil Cleanup Objectives (SCOs).
3. Sample results were reported by the laboratory in ug/kg and converted to mg/kg for comparisons to SCOs.

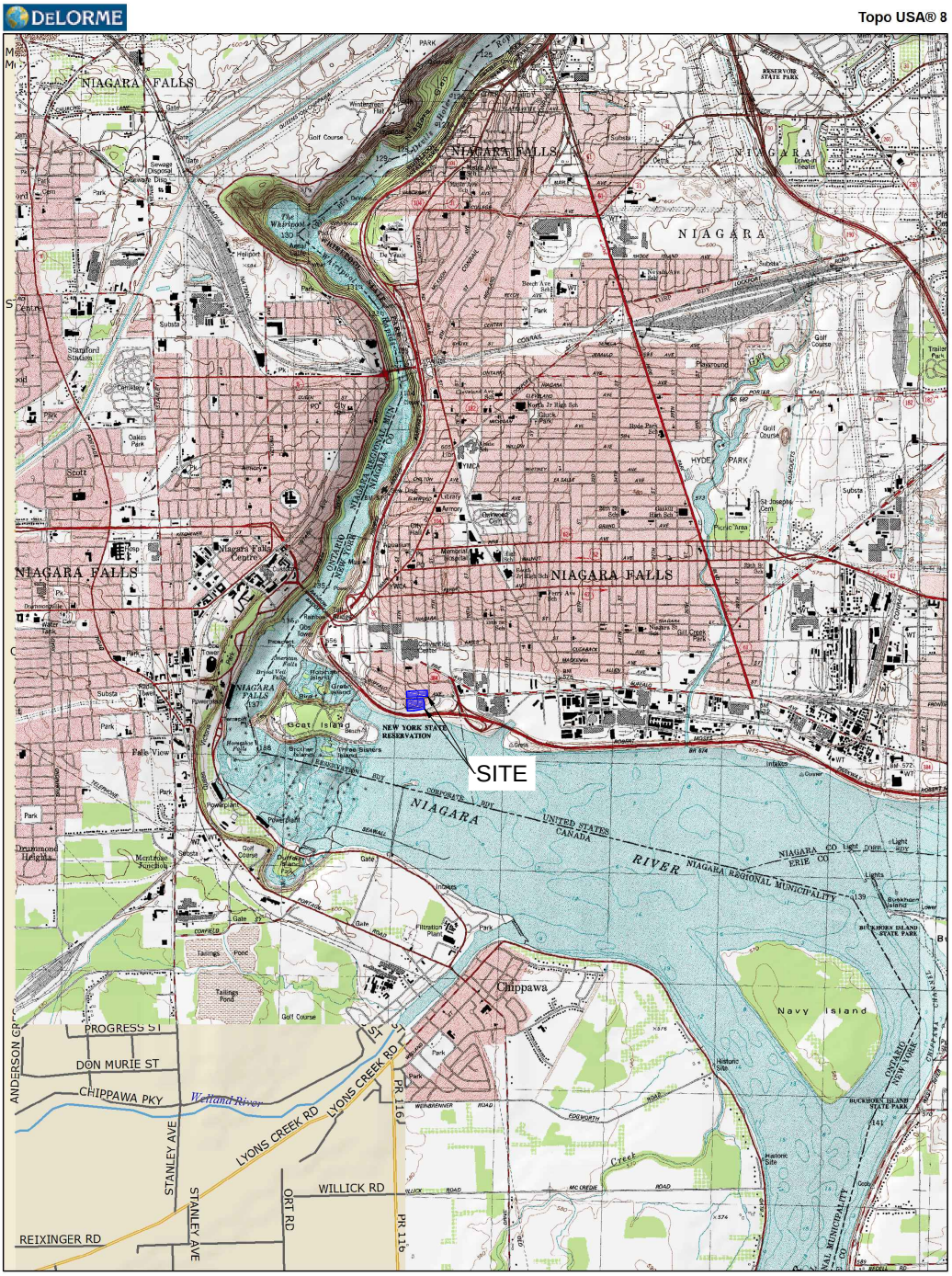
Definitions:

ND = Parameter not detected above laboratory detection limit.
"--" = No value available for the parameter; Parameter not analysed for.
J = Estimated value; result is less than the sample quantitation limit but greater than zero.
P = The RPD between the results for the two columns exceeds the method-specified criteria.
B= Compund was found in the balnk and sample.
I= The lower value for the two columns has been reported due to obvious interference.

Bold	= Result exceeds Unrestricted Use SCOs.
Bold	= Result exceeds Restricted Residential Use SCOs.
Bold	= Result exceeds Commercial Use SCOs.

F:\CAD\TurnKey\Merani Hospitality\401, 402, and 430 Buffalo Ave\RI-IRM-AA REPORT\Figure 1; Site Location and Vicinity Map.dwg

FIGURE 1



TurnKey Environmental Restoration, LLC

2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

PROJECT NO.: 0294-013-001

DATE: MARCH 2015

DRAFTED BY: BLR

SITE LOCATION AND VICINITY MAP

RI-IRM-AA REPORT

402 & 430 BUFFALO AVENUE SITE
BCP SITE No. C932164
NIAGARA FALLS, NEW YORK

PREPARED FOR

MERANI HOSPITALITY, INC.

DATE: OCTOBER 2014
DRAFTED BY: BLR/NTM

FIGURE 2

SITE PLAN (AERIAL)

INTERIM REMEDIAL MEASURES WORK PLAN

401, 402, & 430 BUFFALO AVENUE SITE
BCP SITE No. C932164
NIAGARA FALLS, NEW YORK

PREPARED FOR

MERANI HOSPITALITY

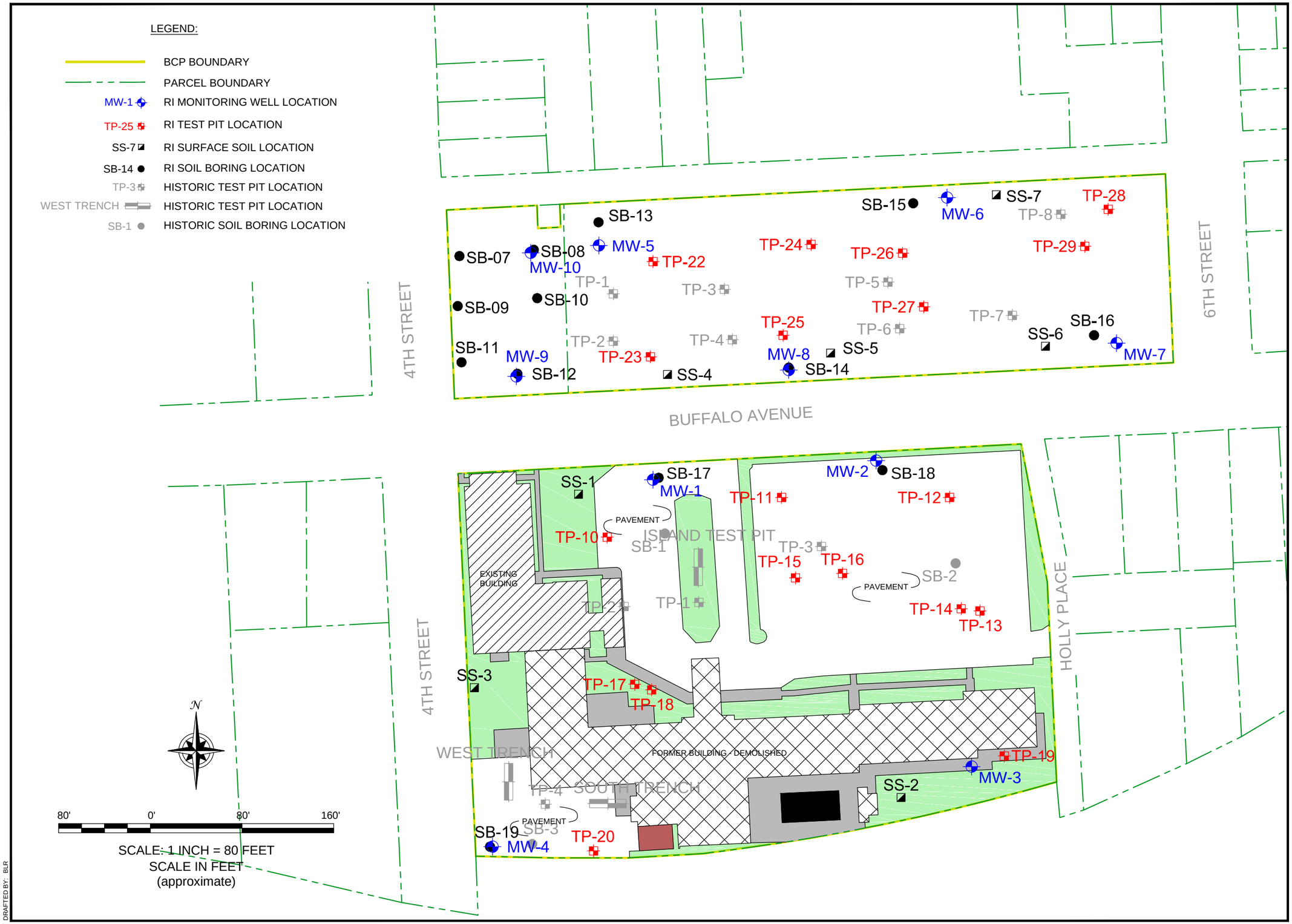
TURNKEY ENVIRONMENTAL RESTORATION, LLC
2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

JOB NO.: 0294-013-001

F:\CAD\TurnKey\Merani Hospitality\401, 402, and 430 Buffalo Ave\RI-IRM-AA REPORT\Figure 3; Historic and RI Sample Locations.dwg

LEGEND:

- BCP BOUNDARY
- PARCEL BOUNDARY
- MW-1 RI MONITORING WELL LOCATION
- TP-25 RI TEST PIT LOCATION
- SS-7 RI SURFACE SOIL LOCATION
- SB-14 RI SOIL BORING LOCATION
- TP-3 HISTORIC TEST PIT LOCATION
- WEST TRENCH HISTORIC TEST PIT LOCATION
- SB-1 HISTORIC SOIL BORING LOCATION



DATE: JUNE 2015
DRAFTED BY: BLR

2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

JOB NO.: 0294-013-001

HISTORIC AND REMEDIAL INVESTIGATION SAMPLE LOCATIONS

RI-IRM-AA REPORT

402 & 430 BUFFALO AVENUE SITE
BCP SITE No. C932164
NIAGARA FALLS, NEW YORK

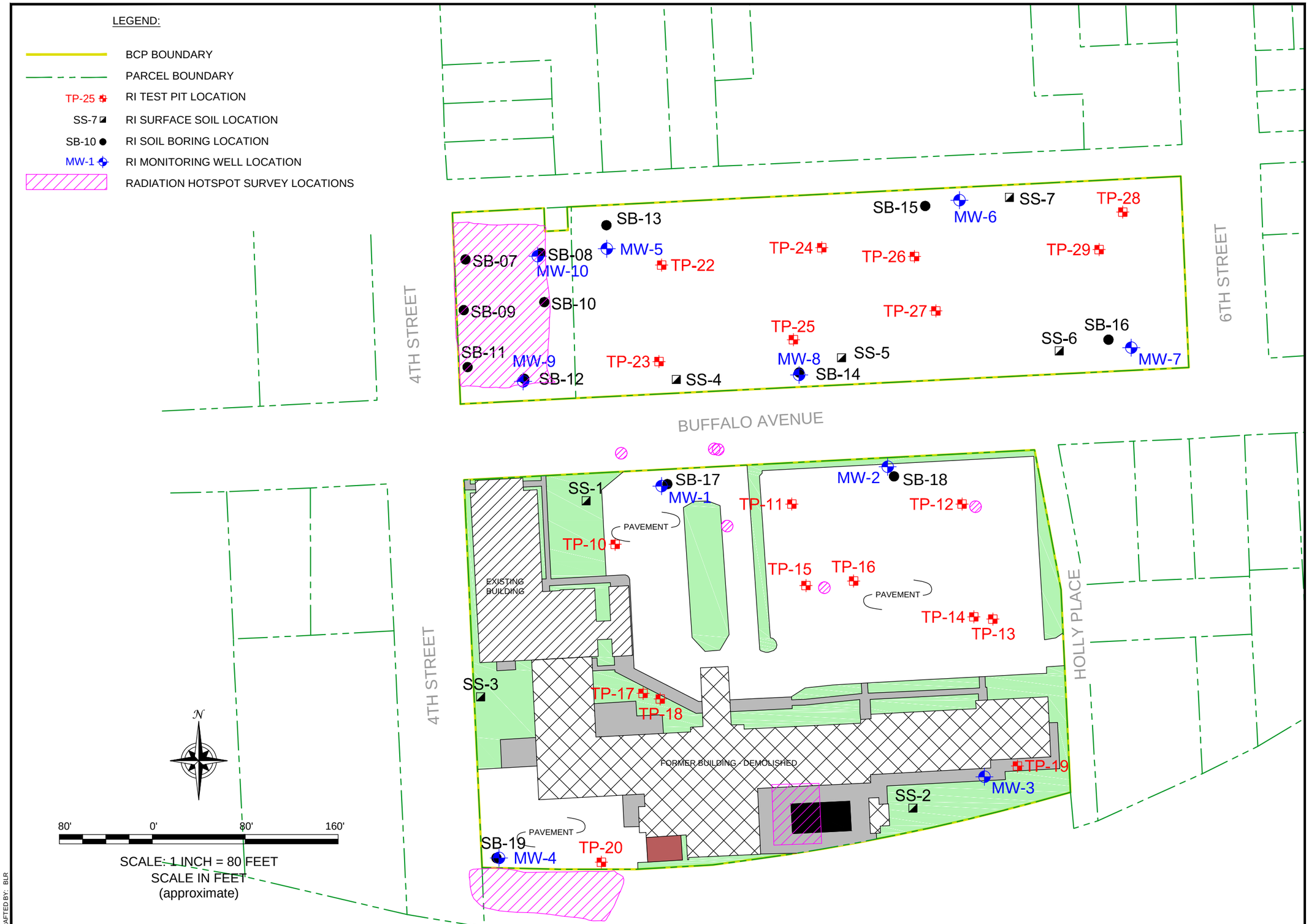
PREPARED FOR
MERANI HOSPITALITY, INC.

FIGURE 3

F:\CAD\TurnKey\Merani Hospitality\401, 402, and 430 Buffalo Ave\RI-IRM-AA REPORT\Figure 5; Radiological Survey Results.dwg

LEGEND:

- BCP BOUNDARY
- PARCEL BOUNDARY
- TP-25 RI TEST PIT LOCATION
- SS-7 RI SURFACE SOIL LOCATION
- SB-10 RI SOIL BORING LOCATION
- MW-1 RI MONITORING WELL LOCATION
- RADIATION HOTSPOT SURVEY LOCATIONS



DATE: JUNE 2015
DRAFTED BY: BLR

2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

TURNKEY ENVIRONMENTAL RESTORATION, LLC

JOB NO.: 0294-013-001

RADIOLOGICAL SURVEY RESULTS

RI-IRM-AA REPORT
402 & 430 BUFFALO AVENUE SITE
BCP SITE No. C932164
NIAGARA FALLS, NEW YORK
PREPARED FOR
MERANI HOSPITALITY, INC.

FIGURE 5

LEGEND:

- BCP BOUNDARY
- PARCEL BOUNDARY
- MW-1 RI MONITORING WELL LOCATION
- TP-25 RI TEST PIT LOCATION
- SS-7 RI SURFACE SOIL LOCATION
- SB-14 RI SOIL BORING LOCATION
- TP-3 HISTORIC TEST PIT LOCATION
- TRACK 4 EXCAVATION LIMITS
- SOIL COVER SYSTEM LIMITS (2 FOOT THICK)

TP-3 IRM AREA

APPROXIMATE SOIL COVER AREA

402 IRM AREA

4TH STREET

6TH STREET

BUFFALO AVENUE

HOLLY PLACE

SB-13, SB-07, SB-08, MW-5, MW-10, TP-22, TP-24, SB-15, MW-6, SS-7, TP-8, TP-28, TP-26, TP-29, TP-1, TP-3, TP-5, SB-09, SB-10, TP-27, TP-7, SB-16, TP-25, TP-6, SS-6, TP-2, TP-4, SB-11, MW-9, TP-23, MW-8, SS-5, MW-7, SB-12, SS-4, SB-14

SS-1, SB-17, MW-1, MW-2, SB-18, TP-11, TP-12, PAVEMENT, TP-10, TP-15, TP-16, EXISTING BUILDING, PAVEMENT, TP-14, TP-13, SS-3, TP-17, TP-18, FORMER BUILDING - DEMOLISHED, TP-19, MW-3, SS-2, PAVEMENT, SB-19, TP-20, MW-4

N

80' 0' 80' 160'

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

DATE: JUNE 2015
DRAFTED BY: BLR

2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0635

TURNKEY ENVIRONMENTAL RESTORATION, LLC

JOB NO.: 0294-013-001

ALTERNATIVE 1: TRACK 4 RESTRICTED RESIDENTIAL CLEANUP OBJECTIVES

RI-IRM-AA REPORT

402 & 430 BUFFALO AVENUE SITE
BCP SITE No. C932164
NIAGARA FALLS, NEW YORK

PREPARED FOR
MERANI HOSPITALITY, INC.

FIGURE 7