



engineering and constructing a better tomorrow

January 31, 2011

Mr. Eugene Melnyk
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 9
270 Michigan Avenue
Buffalo New York 14203-2999

Subject: **2010 Periodic Review Report**
Buffalo Color Corporation – Area “D”
Site No. 915012

Dear Mr. Melnyk:

MACTEC Engineering and Consulting, Inc. (MACTEC) is submitting this Periodic Review Report (PRR) for the Buffalo Color Area “D” Site (Site) on behalf of the property owner, South Buffalo Development LLC (SBD), in response to your letter to dated December 1, 2010. The remainder of this document follows the outline presented in your December 1st letter. The completed Site Management Periodic Review Report (PRR) Notice - Institutional and Engineering controls Certification Form is provided herein as Attachment A. A report titled “2010 Post-Remedial Construction Annual Operations and Maintenance Report, Buffalo Color Corporation Area “D” (O&M Report), is included herein as Attachment B.

I. Introduction

A. Site Summary:

The remedial objectives of the remedy are to eliminate potential direct contact with soils containing contaminant concentrations exceeding New York State Department of Environmental Conservation (NYSDEC) standards and to eliminate the potential discharge of impacted groundwater to the Buffalo River. The key remedial actions for the Site included:

- Stabilization of the shoreline along the Buffalo River and planting appropriate vegetation to enhance aquatic and upland habitat;
- Consolidation of contaminated soil on-site, regrading and capping of the soils;
- Construction of a hydraulic barrier (i.e., slurry wall) along the perimeter of the site (Figure 1 in attached O&M report, Appendix B);

- Installation and operation of a groundwater extraction system (EW-1 through EW-4) to convey extracted groundwater to the treatment system located on Area “A”.
- Installation of groundwater elevation monitoring well network to verify that an inward gradient is maintained across the hydraulic barrier. (These wells are referred to with the “OW” prefix on Figure 1 in the attached 2010 O&M report)

During 2010, the following routine Operations and Maintenance (O&M) activities have been completed in accordance with Post-Remedial Construction Operation and Maintenance Plan, prepared by Parsons Engineers dated January 1999 (referred to hereafter as the O&M Plan):

- Quarterly site inspections,
 - Monthly groundwater extraction system performance monitoring, and
 - Annual reporting.
- B. Effectiveness Monitoring: The cap system is intact with suitable vegetative cover. The groundwater extraction system is effectively maintaining a minimum one-foot head differential between observations on the outside of the hydraulic barrier (near the Buffalo River) and corresponding interior observation wells. When the differential falls below one-foot, the extraction system is operated and effectively lowers the water table within the boundaries of the hydraulic barrier.
- C. Compliance: No areas of non-compliance have been identified.
- D. Recommendations: No changes to the 1999 O&M Plan are currently warranted or recommended. Routine O&M will continue in 2011.

II. Site Overview

- A. Site Location: The site plan is illustrated on Figure 1 of the attached 2010 O&M report. The site is surrounded on the east, west and south by the Buffalo River. To the north is Buffalo Color Area “A” property. Prior to remediation, soils and groundwater containing contaminant concentrations exceeding relevant NYSDEC standards were identified on the site.

It was determined that impacted groundwater was discharging to the Buffalo River. The site remedy included construction of a hydraulic barrier (i.e., slurry wall) around the site as shown on Figure 1, construction of a groundwater extraction system and monitoring network to maintain an inward hydraulic gradient and, construction of a cap system to minimize potential direct contact with the impacted site soils and minimize ground water recharge from precipitation.

Extracted groundwater is conveyed to treatment system, located on Area “A”, where it is combined with groundwater from that area, treated and discharged to the Buffalo Sewer Authority (BSA) pursuant to a BSA discharge permit.

- B. Chronology: Remediation of the Site began on July 24, 1996. Planting of wetland and woody vegetation to enhance aquatic and upland habitat was completed during the spring of 1999. Replanting of trees in several areas and construction of the cap, hydraulic barrier and extraction system was completed by November 2000.

III. Evaluation of Remedy Performance, Effectiveness and Protectiveness

- A. The performance, effectiveness and protectiveness of the remedy is verified by ensuring that the cap system is intact as constructed and that an inward hydraulic gradient is maintained between the observation wells “outside” of the hydraulic barrier (i.e., closest to the Buffalo River- also referred to as exterior wells) and the observation wells “inside” the hydraulic barrier (interior wells). Specifically, a minimum of one-foot hydraulic head differential is to be maintained. During 2010, the head differential was maintained except during January and February, when the differential fell below one-foot but the inward gradient was still maintained. Therefore, the extraction well system was activated and was kept operational until a minimum of two-foot of head differential was established in accordance with the 1999 O&M Plan.

IV. IC/EC Plan Compliance Report – An IC/EC Plan was not required for this site. IC/EC compliance is addressed in the 1999 O&M Plan

- A. Monitoring Plan Compliance Report – A separate Monitoring Plan is not required for this site. Monitoring requirements are addressed in the 1999 O&M Plan.

V. Operations and Maintenance Plan Compliance Report

- A. Components of the O&M Plan: Requirements of the 1999 O& M Plan are:

- Monthly Groundwater Extraction System Maintenance – During this activity, the O&M contractor under contract to Honeywell (OMI) inspects the extraction and observation wells; records groundwater level measurements at each observation well; activates the extraction pumps for a few minutes to ensure that they are operational and to minimize potential for scale accumulation in the lines; and records flow totalizer readings from the extraction system. This information is reported to Honeywell monthly and summarized in the annual O&M report (Attachment B).
- Monthly Treatment Plant Monitoring: Groundwater from the Area “D” extraction system is conveyed to the Area “A” treatment system. The combined groundwater from Area “A” and Area “D” is treated and discharged to the BSA. Discharge samples are collected monthly and the data is submitted to the

NYSDEC and BSA on a quarterly basis as specified in the BSA discharge permit.

- Quarterly Site Inspections: During each quarterly site inspection, OMI inspects the condition of the cap (e.g., vegetative cover, animal burrows, drainage, etc.); the gas vents to ensure that they are in good condition and not obstructed; and the shoreline to verify stability and suitable vegetative cover. Information from the quarterly inspections are included on Site Inspection Checklist forms which are included in the 2010 O&M Report (Attachment B).

B. Summary of O&M Completed During 2010: Monthly system monitoring and quarterly inspections were completed in accordance with the O&M Plan during 2010. The following summarizes the observed conditions:

- In February of 2010, it was noted that the pump in Extraction Well EW-2 appeared to be above the water level and not pumping water. This well will be further evaluated during 2011 to determine if an adjustment of the pump level is necessary.
- During the January and February 2010 monthly monitoring events, the head differential between certain interior and exterior observation wells fell below one-foot. Therefore, the extraction pump system was activated and periodic pumping occurred until a 2 foot differential was obtained at each observation well par.
- On-going trapping of burrowing animals and filling of burrows.

C. Evaluation of Remedial Systems: During 2010, the Area D remedial system appears to be effectively achieving the objectives of the remedial action, as described in the attached 2010 O&M Report.

D. O&M Deficiencies: No deficiencies in complying with the O&M Plan have been noted.

E. Conclusions and Recommendations: Conclusions and recommendations from the attached 2010 O&M report are:

- The remedial goals are being met.
- The groundwater extraction system will continue to be operated as necessary to maintain the necessary water level differential between interior and exterior wells.
- Extraction well EW-2 will continue to be observed and no pumping performed while the water level is below the pump head. If necessary, an adjustment will be made to the pump level.

- Routine O&M activities should continue during 2011.

VI. Overall PRR Conclusions

- A. Compliance: Activities completed during 2010 complied with the OM&M Plan.
- B. Performance and Effectiveness of the Remedy: The condition of the cap system and consistent inward gradient across the hydraulic barrier indicate that the remedy is performing effectively.
- C. Future PRR submittals: It is currently expected that the next PRR will be submitted on or about February 1, 2012.

Closing

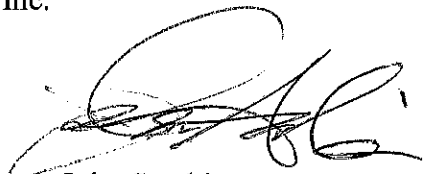
Please contact Mr. John Scrabis at (412) 279-6661 with any questions or comments on this submittal.

Respectfully,

MACTEC Engineering and Consulting, Inc.



Eric Weiler
Project Scientist



John Scrabis
Sr. Principal Engineer

Attachments

cc: J. Yensan (SBD)
E. Melnyk (NYSDEC Region 9)
R. Galloway (Honeywell)
J. Mojka (Honeywell)



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ATTACHMENT A

**PRR NOTICE
IC/EC CONTROLS CERTIFICATION FORM**

MACTEC Engineering and Consulting, Inc.

800 North Bell Avenue, Suite 200 • Pittsburgh, PA 15106 • Phone: 412-279-6661 • Fax: 412-279-8567

www.mactec.com



Enclosure 1
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



| Site Details | | Box 1 | |
|--|--|-------------------------------------|-------------------------------------|
| Site No. | 915012 | | |
| Site Name Buffalo Color Area "D" | | | |
| Site Address: 1337 South Park Avenue | | Zip Code: 14202 | |
| City/Town: Buffalo | | | |
| County: Erie | | | |
| Site Acreage: 19.0 | | | |
| Reporting Period: November 18, 2009 to January 04, 2011 | | | |
| | | YES | NO |
| 1. | Is the information above correct? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| If NO, include handwritten above or on a separate sheet. | | | |
| 2. | Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. | Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. | Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form. | | | |
| 5. | Is the site currently undergoing development? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| | | Box 2 | |
| | | YES | NO |
| 6. | Is the current site use consistent with the use(s) listed below? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. | Are all ICs/ECs in place and functioning as designed? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. | | | |
| A Corrective Measures Work Plan must be submitted along with this form to address these issues. | | | |
| Signature of Owner, Remedial Party or Designated Representative | | Date | |

SITE NO. 915012

Box 3

Description of Institutional Controls

Parcel

122.160-1-10

Owner

South Buffalo Development, LLC

Institutional Control

Landuse Restriction
O&M Plan
Site Management Plan

Box 4

Description of Engineering Controls

Parcel

122.160-1-10

Engineering Control

Cover System
Fencing/Access Control
Groundwater Containment
Pump & Treat

Control Description for Site No. 915012

Parcel: 122.160-1-10

Engineering controls consist of a soil-bentonite slurry wall surrounding Area "D"; a multilayered soil/synthetic membrane cap on a graded base over the entire site within the limits of the slurry wall; extracting and treating groundwater, and discharging the treated groundwater to the Buffalo Sewer Authority sanitary sewer; river shore stabilization using riprap; security fencing; and monitoring well network.

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

☒ ☐

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

(a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

☒ ☐

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. 915012

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 2 and/or 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor pursuant to Section 210.45 of the Penal Law.

Jon M. Williams at 333 Ganson St., Buffalo, NY 14203
print name print business address

am certifying as President of South Buffalo Development, LLC (Owner or Remedial Party)
by its Manager SBD Holdings I, Inc.
for the Site named in the Site Details Section of this form.


Signature of Owner or Remedial Party Rendering Certification

2/1/11
Date

IC/EC CERTIFICATIONS

Box 7

Professional Engineer Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor pursuant to Section 210.45 of the Penal Law.

Mark Stelmack at 511 Congress St., Portland, ME 04109
print name print business address

am certifying as Professional Engineer for the South Buffalo Development, LLC
(Owner or Remedial Party)



Signature of Professional Engineer for the Owner or Remedial Party Rendering Certification

Stamp
(Required for PE)

Jan. 31, 2011
Date

ATTACHMENT B

**2010 POST-REMEDIAL CONSTRUCTION
ANNUAL OPERATIONS AND MAINTENANCE REPORT**

2010
**POST-REMEDIAL CONSTRUCTION ANNUAL
OPERATIONS AND MAINTENANCE REPORT**

BUFFALO COLOR CORPORATION AREA “D”

Buffalo, Erie County, New York

(NYSDEC Site No. 9-15-012)

SUBMITTED TO:



**The New York State Department
of Environmental Conservation
Division of Hazardous Waste Remediation**

SUBMITTED BY:

Honeywell

**101 Columbia Road
Morristown, NJ 07962**

PREPARED BY:


MACTEC Engineering and Consulting, Inc.

800 North Bell Avenue, Suite 200
Pittsburgh, Pennsylvania 15106
(412) 279-6661 Fax (412) 279-8567

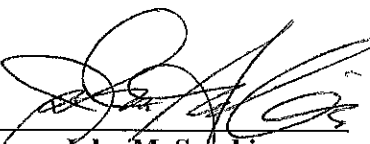
January 2011

2010
POST-REMEDIAL CONSTRUCTION ANNUAL
OPERATIONS AND MAINTENANCE REPORT
BUFFALO COLOR CORPORATION AREA "D"
BUFFALO, NEW YORK

Prepared for:
HONEYWELL
Morristown, NJ 07962



Eric Weiler
Project Scientist



John M. Scrabis
Senior Principal Engineer

MACTEC Engineering and Consulting, Inc.
Pittsburgh, Pennsylvania

January 2011
Project 3410070501

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1.0 INTRODUCTION

In accordance with the New York State Department of Environmental Conservation (NYSDEC) Order on Consent (Index No. B9-0014-84-01RD), Honeywell (formerly AlliedSignal Inc.), performed a remedial action and is providing long-term operations and maintenance (O&M) at the Buffalo Color Area “D” Site (Site). The activities described in this report were completed in accordance with the Post-Remedial Construction Operation and Maintenance Plan (Parsons Engineers, January 1999).

The primary remedial objectives at the Site are to eliminate the potential for direct contact with impacted soils and to eliminate the potential for impacted groundwater to discharge to the Buffalo River. The key remedial actions for the Site included stabilizing the river bank and planting appropriate vegetation to enhance aquatic and upland habitat; consolidating waste; regrading and capping of the soils within the Site; constructing a hydraulic barrier (i.e., slurry wall) around the perimeter of the site (Figure 1); collecting and treating non-aqueous phase liquid (NAPL) and groundwater; and long-term groundwater monitoring.

Remediation of the Site began on July 24, 1996. Planting of wetland and woody vegetation to enhance aquatic and upland habitat along the Buffalo River was completed during the spring of 1999. Replanting of trees in several areas was completed on November 2, 2000.

This annual report has been prepared by MACTEC Engineering and Consulting, Inc. (MACTEC) on behalf of Honeywell to summarize O&M activities completed from January 1, 2010 through December 31, 2010 for the site. The site plan is shown on Figure 1.

1.1 PROCEDURES

The following O&M activities occurred at the Site during 2010.

1.1.1 Treatment Plant

1.1.1.1 Treatment Plant Flow Rate

When the treatment plant is operated, the flow rate is measured with Foxboro magnetic flow transmitters. Influent and effluent flow rate and totals are cumulative and recoverable using the system Programmable

Logic Controller (PLC). The average influent and effluent flow rates are calculated, and the total volume (gallons) discharged from the treatment facility is recorded.

1.1.1.2 Sampling Procedure

No sampling was conducted for Area D specifically. Sampling was conducted monthly in accordance with the Buffalo Sewer Authority (BSA) Permit for the combined Area A/Area D groundwater discharge. The 2010 Discharge Monitoring Reports for the combined discharge are included in Appendix A.

1.1.1.3 System Maintenance

Maintenance activities were performed routinely by Honeywell's O&M contractor, OMI, for the Area D remediation system on a monthly basis or as needed throughout the year. During the reporting period, OMI visited the site for measurement of water levels, site inspection and routine maintenance approximately once per month. Relevant information from those visits is provided in the following sections.

1.1.2 Observation Wells

The water level in each of the twelve observation wells was measured by OMI approximately monthly. The water levels were measured with an electronic water level indicator, and reported as an elevation above mean sea level. Observation wells located inside the perimeter of the containment wall are labeled with an "I" (e.g. OW-2I), whereas those outside of the wall were labeled with an "E" (e.g. OW-2E), as shown on Figure 1.

The water level measurements were used to prepare the hydrographs provided in Appendix B. The table provided in Appendix C presents the measured groundwater levels across the containment wall. An adequate inward hydraulic gradient (i.e., greater than one foot difference between corresponding I and E wells) was measured during the majority of the 2010 monitoring events. The inward gradient measurements of less than one foot were recorded at all the observation wells during January 2010 and at one observation well set in February 2010. At no time did an outward gradient occur. The pumping system was activated when observed water level measurements fell below the one foot difference to mitigate any effects that external water level fluctuations may have on the gradient. The system operated until the gradient returned to acceptable levels.

Initially, when the pumps from Area D were activated, flow was confirmed from pumps in extraction wells EW-1 and EW-3. Pump EW-4 was repaired and put back online in February of 2010. Pump EW-4 was found to be deficient in the 4th Quarter of 2009. Pump EW-2 does not collect any groundwater because it is above the groundwater. During 2011, conditions at EW-2 will be evaluated to determine if an adjustment to the pump intake elevation is necessary. With the limited deficiencies at EW-4 and EW-2 throughout the year, the overall effect of the pumping was a balanced decline of internal water levels at all six observation points. Also, there was no impact on the ability of the system to draw down the water table to acceptable levels.

1.1.3 Site Inspections

Quarterly inspections were completed by OMI on February 15, April 22, August 16, and October 27, 2010. The inspections were conducted in accordance with the Post-Remedial Construction Operation and Maintenance Plan, dated January 1999. The shoreline, wetlands, wells, drainage, gas vents, and cap were visually inspected during each event. The results of the inspections are included in Appendix D.

2.0 RESULTS

2.1 TREATMENT SYSTEM

2.1.1 Discharge

The Area D groundwater extraction system was operated intermittently during 2010 to maintain an inward gradient. Approximately 233,440 gallons of groundwater was pumped from Area D during the 2010 period, as discussed in Section 2.2.

2.1.2 Influent/Effluent Sampling

The pumped Area D groundwater is conveyed to the treatment system on Buffalo Color Area A, where it combines with the discharge from Area A extraction wells EW-1 and EW-2 and is pre-treated via carbon vessels. From there, the discharge is combined with the effluent from Area A extraction wells EW-3, EW-4, and EW-5 and discharged to the BSA sewer system. Monthly sampling of the effluent is completed as required by the BSA Permit and the results are provided in quarterly reports submitted to the BSA and copied to NYSDEC. Copies of the related discharge monitoring reports for the combined treatment discharge are included in Appendix A. No exceedances of the BSA Permit limits associated with the Area D effluent were observed during 2010.

2.1.3 Treatment Plant Performance and Maintenance

The treatment plant is operated continuously as part of the OM&M for Area A, an interim corrective measure that consists of the extraction and treatment of groundwater from Area A. Maintenance of the treatment plant includes activated carbon canister exchange, backwashing the multi-media filters, maintenance of the pH probe, and other maintenance as needed to maintain groundwater extraction from Area A. Additionally, the Area D pumps are operated as needed to maintain the required inward gradient between the outside and inside of the Area D containment wall. The Area D groundwater is treated at the treatment plant along with the groundwater originating from Area A extraction wells EW-1 and EW-2. Non-routine maintenance of Area D during the reporting period included repairs of the pump at EW-4, replacing the flow meter at EW-2, and installing multiple no trespassing signs along the railroad embankment. The discharge from the treatment plant to the BSA is currently conducted under a BSA permit that is for both Area A and Area D (i.e., the combined discharge).

2.2 OBSERVATION WELLS

As shown on the table below and the hydrographs in Appendix B, the water levels in the interior wells were generally between approximately one foot and 6.72 feet lower than the levels in the exterior wells during this reporting period except during January and February 2010, when the level difference fell below one foot but an inward gradient was still maintained. The data indicates that potentially impacted groundwater was not leaving the Site.

A total of approximately 233,440 gallons of groundwater was pumped from Area D during 2010 as indicated on the table below. In general, pumping occurred at each extraction well monthly as a maintenance procedure to minimize potential detrimental effects of scaling. The other reason for pumping to be initiated was if the head difference between the interior and corresponding exterior wells falls below one foot as directed by the 1999 O&M Plan.

The only time this situation occurred during 2010 was in January and February. Periodic pumping was performed until an inward two foot head differential was observed at each observation well cluster in accordance with the O&M plan.

The following table shows the flow totalizer readings and the level difference between the exterior wells (River Wells) and interior wells (Landfill Wells) as measured during 2010:

| Vault | EW-1 | EW-2 | EW-3 | EW-4 | Interim Flow (gallons) | Level Difference Between River Wells and Landfill Wells (ft) | | | | | |
|----------|----------------------------------|---------|---------|---------|------------------------------|--|------------------|------------------|------------------|------------------|------------------|
| Date | Flow Totalizer Reading (gallons) | | | | | OW-1E & OW-1I | OW-2E & OW-2I | OW-3E & OW-3I | OW-4E & OW-4I | OW-5E & OW-5I | OW-6E & OW-6I |
| 1/17/10 | 1570300 | 1637910 | 912030 | 1688090 | | 0.79 | 0.56 | 0.93 | 0.71 | 0.65 | 0.97 |
| 2/4/10 | 1571840 | 1637910 | 920510 | 1688090 | 10020 | 1.47 | 1.11 | 1.07 | 1.40 | 1.34 | 1.20 |
| 2/24/10 | 1572850 | 1637910 | 926190 | 1693010 | 11610 | 1.09 | 1.06 | 1.20 | 1.02 | 0.97 | 1.18 |
| 3/10/10 | 1578060 | 1637910 | 952560 | 1719060 | 57630 | 1.50 | 1.57 | 1.66 | 1.49 | 1.45 | 1.72 |
| 3/30/10 | 1580190 | 1637910 | 972300 | 1731540 | 34350 | 2.47 | 2.48 | 2.57 | 2.43 | 2.37 | 2.57 |
| 4/29/10 | 1582790 | 1637910 | 1000140 | 1745360 | 44260 | 2.99 | 2.96 | 2.22 | 2.59 | 2.55 | 2.29 |
| 5/17/10 | 1583940 | 1637910 | 1020010 | 1755240 | 30900 | 3.45 | 2.37 | 1.85 | 1.69 | 1.68 | 2.07 |
| 5/27/10 | 1584100 | 1637910 | 1021730 | 1756120 | 2760 | 2.92 | 1.84 | 2.34 | 2.21 | 2.19 | 2.28 |
| 6/18/10 | 1584100 | 1637910 | 1021730 | 1756120 | 0 | 2.87 | 2.71 | 2.61 | 2.35 | 2.36 | 2.50 |
| 7/30/10 | 1584160 | 1637910 | 1022470 | 1756530 | 1210 | NR | NR | 2.22 | 2.10 | 6.72 | 2.29 |
| 8/2/10 | 1584160 | 1637910 | 1022470 | 1756530 | 0 | 2.52 | 2.45 | 2.22 | 2.10 | 6.72 | 2.29 |
| 8/10/10 | 1584160 | 1637910 | 1022470 | 1756530 | 0 | 2.63 | 2.49 | 2.39 | 2.40 | 2.34 | 2.42 |
| 9/15/10 | 1584160 | 1637910 | 1022470 | 1756530 | 0 | 2.00 | 1.81 | 1.81 | 1.78 | 1.71 | 1.70 |
| 9/27/10 | 1584160 | 1637910 | 1033030 | 1763360 | 17390 | 2.33 | 2.22 | 2.27 | 2.07 | 1.00 | 2.35 |
| 10/12/10 | 1584700 | 1637910 | 1036030 | 1765590 | 5770 | 1.65 | 1.50 | 1.49 | 1.36 | 1.38 | 1.48 |
| 10/19/10 | 1584700 | 1637910 | 1036030 | 1765590 | 0 | 2.17 | 2.08 | 1.90 | 1.98 | 1.84 | 1.93 |
| 11/19/10 | 1584880 | 1637910 | 1038600 | 1767310 | 4470 | 1.37 | 1.18 | 1.10 | 1.23 | 1.14 | 1.13 |
| 1/2/11 | 1585400 | 1637910 | 1045910 | 1772550 | 13070 | 1.10 | 0.99 | 1.00 | 0.93 | 0.94 | 1.03 |

Total Gallons: 233,440

NR - Indicated Data Not Recorded

Prepared by: ESW

Checked by: JAT

2.3 SITE INSPECTIONS

Quarterly inspections by OMI were completed on February 15, April 22, August 16, and October 27, 2010. The inspections were conducted in accordance with the Post-Remedial Construction Operation and Maintenance Plan, dated January 1999. The shoreline, wetlands, wells, drainage, gas vents, and cap were visually inspected. The completed inspection forms are included in Appendix D.

A representative of NYSDEC participated in two of the four quarterly inspections, but was unable to attend the first and third quarter inspections. These inspections indicated that the Site has a substantial vegetative cover and that the surface drainage system is in good condition. There is no evidence of sediment buildup, ponded water, or slope instability that would indicate that the drainage system is failing. The access road was also in good condition. The condition of the gates, locks, and signs were sufficient to restrict access. The integrity of the groundwater monitoring wells and extraction wells were verified during the inspections. Table 1 summarizes the results of the Site inspections, and copies of the completed inspection checklists are provided in Appendix D.

2.3.1 February 15, 2010 Inspection

The integrity of the cap was acceptable during the inspection. There was no evidence of litter or unauthorized dumping by trespassers. The gas venting system and erosion control riprap were in acceptable condition. It was noted that EW-2 pump appeared to be above the water level and not pumping water. Because of snow cover, OMI was unable to inspect the condition of the vegetative cover during the February 2010 inspection. The vegetative cover was inspected during subsequent inspections.

2.3.2 April 22, 2010 Inspection

The integrity of the cap was acceptable during the inspection. The gas venting system and erosion control riprap were in acceptable condition. There was no evidence of litter or unauthorized dumping by trespassers. During the April 2010 inspection, the NYSDEC representatives, David Szymanski and Gene Melnyk, indicated that fencing may be needed along the railroad embankment to prevent future trespassers.

2.3.3 August 16, 2010 Inspection

The integrity of the cap was acceptable during the inspection. The gas venting system and erosion control riprap were in acceptable condition. There was no evidence of litter or unauthorized dumping by trespassers. Animal borrows were encountered during the inspection. Personnel were contacted to trap and remove the animals and the burrows were filled in.

2.3.4 October 27, 2010 Inspection

The integrity of the cap was acceptable during the inspection. There was no evidence of litter or unauthorized dumping by trespassers. The gas venting system and erosion control riprap were in acceptable condition. Animal borrows were encountered during the inspection at EW-2. Trapping and removal of the animals was continued and the burrows were filled in.

3.0 CONCLUSIONS AND RECOMMENDATIONS

The performance of the treatment system was evaluated based on maintaining an inward hydraulic gradient across the containment wall. This performance factor has been met over the period of this report (January 1, 2010 through December 31, 2010). The following conclusions and recommendations were developed based on the data collected during this period:

- South Buffalo Development LLC (SBD) purchased the land associated with Area D along with the parcels associated with former Buffalo Color Areas A, B, C, and E in October 2008. Honeywell and SBD intend to negotiate an agreement regarding future O&M responsibilities for Area D. NYSDEC will be notified of any agreement reached between SBD and Honeywell on this matter. Until such time Honeywell will continue to provide the required O&M for Area "D".
- The cap and extraction systems are functioning as necessary to maintain the remedial goals.
- The groundwater extraction system will continue to be operated as necessary during 2011 to maintain the required inward head differential.
- Routine O&M activities should continue during 2011, with an Annual report and PRR submittal made by February 2012.

TABLE

Table 1

**Visual Site Evaluation Results – Buffalo Color Area D
2010**

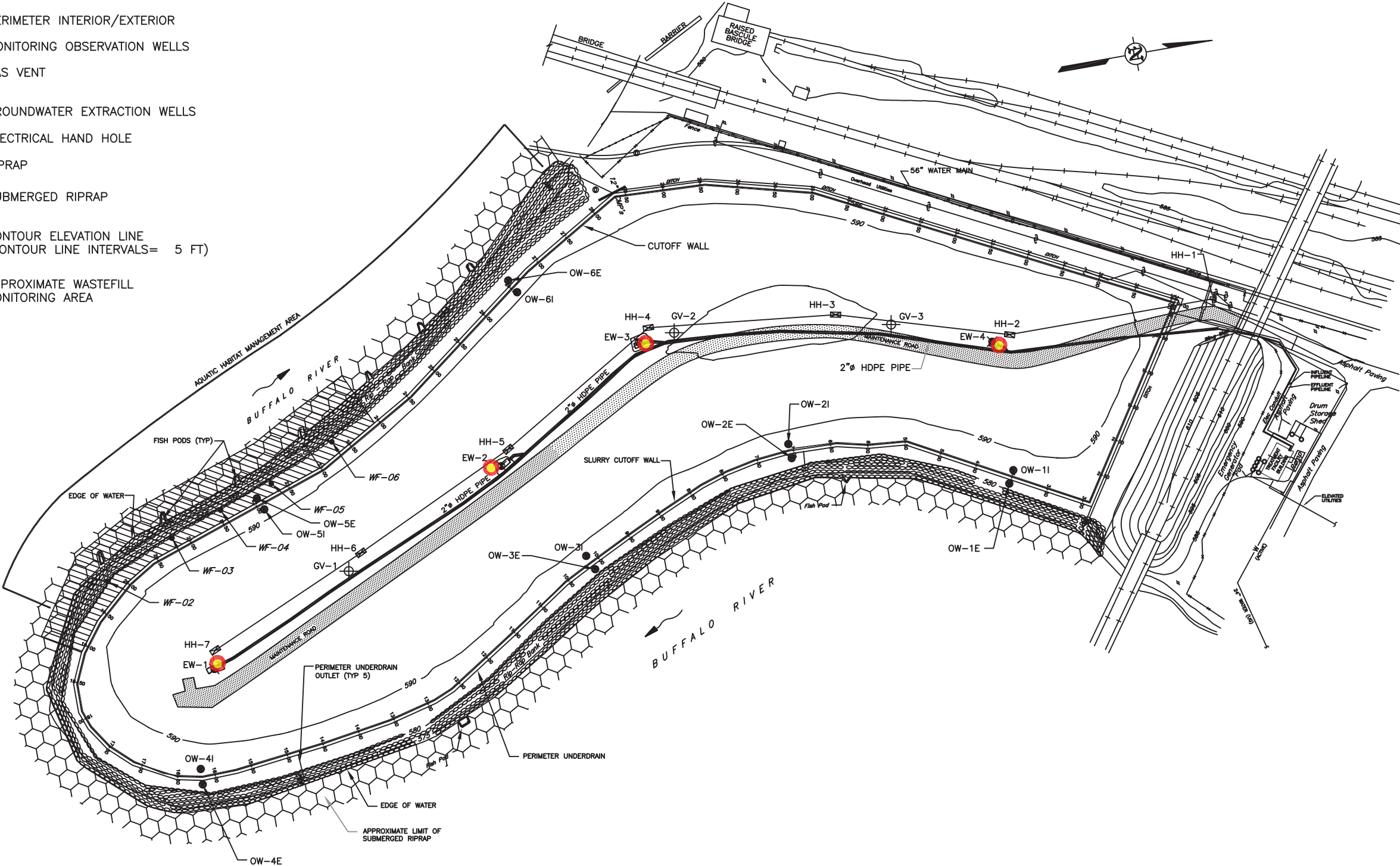
| Visual Evaluation Item | Acceptable | Not Acceptable | Comments |
|------------------------------|------------|----------------|--|
| Vegetative Cover | X | | Cover was in good condition. |
| Integrity of Drainage System | X | | System was in good condition. |
| Condition of Roads | X | | Roads were in good condition. |
| Integrity of Wells | X | | Pump EW-4 repaired, Pump EW-2 above water level. |
| Integrity of the Cap | X | | Noted animal burrows. Holes were filled and animals were trapped. |
| Gas Venting System | X | | System was in good condition. |
| Erosion Control Structures | X | | The erosion control structures were in good condition. |

Created by: ESW
Checked by: JMS

FIGURE

LEGEND

- SUBSURFACE GW COLLECTION PIPE
- SLURRY CUTOFF WALL
- OW-6E PERIMETER INTERIOR/EXTERIOR
- OW-61 MONITORING OBSERVATION WELLS
- GV-2 GAS VENT
- EW-1 GROUNDWATER EXTRACTION WELLS
- ELECTRICAL HAND HOLE
- RIPRAP
- SUBMERGED RIPRAP
- 580 CONTOUR ELEVATION LINE (CONTOUR LINE INTERVALS= 5 FT)
- APPROXIMATE WASTEFILL MONITORING AREA



ORIGINAL FROM PARSONS INFRASTRUCTURE & TECHNOLOGY GROUP

PROJECT NUMBER: 3410050346

DRAWING NUMBER: B(01).dwg

DATE: 7/12/06

DRAWN BY: ESW

FILE: P:\PROJECTS\Honeywell\BuffaloNY\BuffaloColorAreaD\B(01).dwg

APPROVED BY:



MACTEC
Engineering & Consulting Inc.
700 North Bell Avenue Suite 200
Pittsburgh, PA 15106

SITE MAP
HONEYWELL
BUFFALO COLOR AREA "D"
BUFFALO, NEW YORK

FIGURE

1

APPENDIX A
DISCHARGE MONITORING REPORTS

Compliance Confirmation

Discharge Monitoring Report for January 2010

| | |
|------------------|----------------------------|
| BSA Permit No. | 09-06-BU109 |
| Sample Date: | 01/14/10 |
| Sample Location: | Onsite Pump Station to BSA |

Prepared by: BBL
Date: 2/2/2010
Checked by: RTB
Date: 4/2/2010

| BSA Permit Parameter | Input Analytical Results | | | Converted Analytical Results | | BSA Daily Max Discharge Limit | | Permit Compliance | MAID mg/L | Quantity mg/L | Permit Compliance |
|-------------------------------|--------------------------|-----------------|------|------------------------------|---------|-------------------------------|---------|-------------------|-----------|---------------|-------------------|
| | Quantity | Reporting Limit | Unit | Quantity | Unit | Quantity | Unit | | | | |
| pH | 9.23 | NA | SU | 9.23 | SU | 5.0 - 12.0 | SU | Yes | | | |
| BOD5 | 16.1 | 2.0 | mg/L | 16.1 | mg/L | 250 | mg/L | Yes | | | |
| Total Phenol | 0.0400 | 0.0100 | mg/L | 0.004 | lbs/day | 1.67 | lbs/day | Yes | 20 | 0.0400 | Yes |
| Total Chromium | 0.0065 | 0.0040 | mg/L | 0.0007 | lbs/day | 0.83 | lbs/day | Yes | 40 | 0.0065 | Yes |
| Total Copper | 0.0155 | 0.0100 | mg/L | 0.002 | lbs/day | 0.67 | lbs/day | Yes | 16 | 0.0155 | Yes |
| Lead | 0.0035 | 0.0050 | mg/L | 0.0004 | lbs/day | 0.541 | lbs/day | Yes | 65 | 0.0035 | Yes |
| Total Mercury | ND | 0.0002 | mg/L | ND | lbs/day | 0.00033 | lbs/day | Yes | | | |
| Total Nickel | 0.0068 | 0.0100 | mg/L | 0.0007 | lbs/day | 1.17 | lbs/day | Yes | 14 | 0.007 | Yes |
| Zinc | 0.0196 | 0.0100 | mg/L | 0.002 | lbs/day | 2.046 | lbs/day | Yes | 25 | 0.0196 | Yes |
| Amendable Cyanide | 0.0653 | 0.0100 | mg/L | 0.007 | lbs/day | 2.59 | lbs/day | Yes | 6.2 | 0.0653 | Yes |
| Total PCB | ND | 0.059 | ug/L | ND | lbs/day | 0.0001 | lbs/day | Yes | 0.002 | ND | Yes |
| Aniline or Aniline Derivative | 1900 | 500 | ug/L | 1.9 | mg/L | * | mg/L | Yes | | | |
| Max Individual Purgeables | 420 | 2000 | ug/L | 0.420 | mg/L | * | mg/L | Yes | | | |
| Total Suspended Solids | 16.4 | 4.0 | mg/L | 16.4 | mg/L | 250 | mg/L | Yes | | | |
| Total Phosphate** | 1.46 | 0.0500 | mg/L | 1.5 | mg/L | 15.35 | mg/L | Yes | | | |
| Total Flow (average) | 8.62 | | gpm | 12,411 | gpd | 50,000 | gpd | Yes | | | |

*Permit requires reporting of Aniline or Aniline Derivative and Max Individual Purgeables concentrations in excess of 0.01 mg/L.

**Analyzed by total phosphorus method SM 4500-P E

MAID - Maximum Allowable Instantaneous Discharge

| Flow Calculations | | | | | | |
|--------------------------------|----------------|-----------|-----------|-----------|-----------|------------|
| | EW-1 | EW-2 | EW-3 | EW-4 | EW-5 | |
| Initial Reading | 5,409,689 | 2,512,619 | 2,501,657 | 3,062,232 | 1,038,261 | 12/17/2009 |
| Final Reading | 5,543,058 | 2,587,842 | 2,547,225 | 3,148,576 | 1,045,267 | 1/14/2010 |
| Total Days in Period | 28 | | | | | |
| Total Flow for Period | 347,510 | | gallons | | | |
| Average Flow for Period | 8.62 | | gpm | | | |

Compliance Confirmation

Discharge Monitoring Report for February 2010

| | |
|------------------|----------------------------|
| BSA Permit No. | 09-06-BU109 |
| Sample Date: | 02/11/10 |
| Sample Location: | Onsite Pump Station to BSA |

Prepared by: BBL
Date: 2/24/2010
Checked by: RTB
Date: 4/2/2010

| BSA Permit Parameter | Input Analytical Results | | | Converted Analytical Results | | BSA Daily Max Discharge Limit | | Permit Compliance | MAID mg/L | Quantity mg/L | Permit Compliance |
|-------------------------------|--------------------------|-----------------|------|------------------------------|---------|-------------------------------|---------|-------------------|-----------|---------------|-------------------|
| | Quantity | Reporting Limit | Unit | Quantity | Unit | Quantity | Unit | | | | |
| pH | 8.72 | NA | SU | 8.72 | SU | 5.0 - 12.0 | SU | Yes | | | |
| BOD5 | 8.9 | 2.0 | mg/L | 8.9 | mg/L | 250 | mg/L | Yes | | | |
| Total Phenol | 0.0217 | 0.0100 | mg/L | 0.002 | lbs/day | 1.67 | lbs/day | Yes | 20 | 0.0217 | Yes |
| Total Chromium | 0.0083 | 0.0040 | mg/L | 0.001 | lbs/day | 0.83 | lbs/day | Yes | 40 | 0.0083 | Yes |
| Total Copper | 0.126 | 0.0100 | mg/L | 0.009 | lbs/day | 0.67 | lbs/day | Yes | 16 | 0.1260 | Yes |
| Lead | 0.0047 | 0.0050 | mg/L | 0.0004 | lbs/day | 0.541 | lbs/day | Yes | 65 | 0.0047 | Yes |
| Total Mercury | 0.0001 | 0.0002 | mg/L | 0.00001 | lbs/day | 0.00033 | lbs/day | Yes | | 0.0001 | |
| Total Nickel | 0.0104 | 0.0100 | mg/L | 0.0008 | lbs/day | 1.17 | lbs/day | Yes | 14 | 0.010 | Yes |
| Zinc | 0.0514 | 0.0100 | mg/L | 0.004 | lbs/day | 2.046 | lbs/day | Yes | 25 | 0.0514 | Yes |
| Amendable Cyanide | 0.0051 | 0.0100 | mg/L | 0.0004 | lbs/day | 2.59 | lbs/day | Yes | 6.2 | 0.0051 | Yes |
| Total PCB | ND | 0.062 | ug/L | ND | lbs/day | 0.0001 | lbs/day | Yes | 0.002 | ND | Yes |
| Aniline or Aniline Derivative | 1200 | 990 | ug/L | 1 | mg/L | * | mg/L | Yes | | | |
| Max Individual Purgeables | 83 | 25 | ug/L | 0.083 | mg/L | * | mg/L | Yes | | | |
| Total Suspended Solids | ND | 4.0 | mg/L | ND | mg/L | 250 | mg/L | Yes | | | |
| Total Phosphate** | 0.582 | 0.0100 | mg/L | 0.6 | mg/L | 15.35 | mg/L | Yes | | | |
| Total Flow (average) | 6.26 | | gpm | 9,020 | gpd | 50,000 | gpd | Yes | | | |

*Permit requires reporting of Aniline or Aniline Derivative and Max Individual Purgeables concentrations in excess of 0.01 mg/L.

**Analyzed by total phosphorus method SM 4500-P E

MAID - Maximum Allowable Instantaneous Discharge

| Flow Calculations | | | | | | |
|--------------------------------|----------------|-----------|-----------|-----------|-----------|-----------|
| | EW-1 | EW-2 | EW-3 | EW-4 | EW-5 | |
| Initial Reading | 5,543,058 | 2,587,842 | 2,547,225 | 3,148,576 | 1,045,267 | 1/14/2010 |
| Final Reading | 5,669,286 | 2,661,381 | 2,588,802 | 3,159,786 | 1,045,267 | 2/11/2010 |
| Total Days in Period | 28 | | | | | |
| Total Flow for Period | 252,554 | | gallons | | | |
| Average Flow for Period | 6.26 | | gpm | | | |

Compliance Confirmation

Discharge Monitoring Report for March 2010

| | |
|------------------|----------------------------|
| BSA Permit No. | 09-06-BU109 |
| Sample Date: | 03/18/10 |
| Sample Location: | Onsite Pump Station to BSA |

Prepared by: RTB
Date: 4/5/2010
Checked by: BBL
Date: 4/13/2010

| BSA Permit Parameter | Input Analytical Results | | | Converted Analytical Results | | BSA Daily Max Discharge Limit | | Permit Compliance | MAID mg/L | Quantity mg/L | Permit Compliance |
|-------------------------------|--------------------------|-----------------|------|------------------------------|---------|-------------------------------|---------|-------------------|-----------|---------------|-------------------|
| | Quantity | Reporting Limit | Unit | Quantity | Unit | Quantity | Unit | | | | |
| pH | 9.30 | NA | SU | 9.3 | SU | 5.0 - 12.0 | SU | Yes | | | |
| BOD5 | 5.6 | 2.0 | mg/L | 5.6 | mg/L | 250 | mg/L | Yes | | | |
| Total Phenol | 0.0316 | 0.0100 | mg/L | 0.002 | lbs/day | 1.67 | lbs/day | Yes | 20 | 0.0316 | Yes |
| Total Chromium | 0.0071 | 0.0040 | mg/L | 0.0005 | lbs/day | 0.83 | lbs/day | Yes | 40 | 0.0071 | Yes |
| Total Copper | 0.0228 | 0.0100 | mg/L | 0.001 | lbs/day | 0.67 | lbs/day | Yes | 16 | 0.0228 | Yes |
| Lead | 0.0047 | 0.0050 | mg/L | 0.0003 | lbs/day | 0.541 | lbs/day | Yes | 65 | 0.0047 | Yes |
| Total Mercury | ND | 0.0002 | mg/L | ND | lbs/day | 0.00033 | lbs/day | Yes | | | |
| Total Nickel | 0.0073 | 0.0100 | mg/L | 0.0005 | lbs/day | 1.17 | lbs/day | Yes | 14 | 0.0073 | Yes |
| Zinc | 0.0150 | 0.0100 | mg/L | 0.001 | lbs/day | 2.046 | lbs/day | Yes | 25 | 0.0150 | Yes |
| Amendable Cyanide | 0.0291 | 0.0100 | mg/L | 0.002 | lbs/day | 2.59 | lbs/day | Yes | 6.2 | 0.0291 | Yes |
| Total PCB | ND | 0.059 | ug/L | ND | lbs/day | 0.0001 | lbs/day | Yes | 0.002 | ND | Yes |
| Aniline or Aniline Derivative | 8700 | 5000 | ug/L | 8.700 | mg/L | * | mg/L | Yes | | | |
| Max Individual Purgeables | 60 | 25 | ug/L | 0.060 | mg/L | * | mg/L | Yes | | | |
| Total Suspended Solids | 8.0 | 4.0 | mg/L | 8.0 | mg/L | 250 | mg/L | Yes | | | |
| Total Phosphate** | 0.806 | 0.0500 | mg/L | 0.806 | mg/L | 15.35 | mg/L | Yes | | | |
| Total Flow (average) | 5.47 | | gpm | 7,877 | gpd | 50,000 | gpd | Yes | | | |

*Permit requires reporting of Aniline or Aniline Derivative and Max Individual Purgeables concentrations in excess of 0.01 mg/L.

**Analyzed by total phosphorus method SM 4500-P E

MAID - Maximum Allowable Instantaneous Discharge

| Flow Calculations | | | | | | |
|--------------------------------|----------------|-----------|-----------|-----------|-----------|-----------|
| | EW-1 | EW-2 | EW-3 | EW-4 | EW-5 | |
| Initial Reading | 5,669,286 | 2,661,381 | 2,588,802 | 3,159,786 | 1,045,267 | 2/11/2010 |
| Final Reading | 5,809,230 | 2,748,978 | 2,634,068 | 3,162,679 | 1,045,267 | 3/18/2010 |
| Total Days in Period | 35 | | | | | |
| Total Flow for Period | 275,700 | | gallons | | | |
| Average Flow for Period | 5.47 | | gpm | | | |

Compliance Confirmation

Discharge Monitoring Report for April 2010

| | |
|------------------|----------------------------|
| BSA Permit No. | 09-06-BU109 |
| Sample Date: | 04/23/10 |
| Sample Location: | Onsite Pump Station to BSA |

Prepared by: BBL
Date: 5/12/2010
Checked by: RTB
Date: 7/14/2010

| BSA Permit Parameter | Input Analytical Results | | | Converted Analytical Results | | BSA Daily Max Discharge Limit | | Permit Compliance | MAID mg/L | Quantity mg/L | Permit Compliance |
|-------------------------------|--------------------------|-----------------|------|------------------------------|---------|-------------------------------|---------|-------------------|-----------|---------------|-------------------|
| | Quantity | Reporting Limit | Unit | Quantity | Unit | Quantity | Unit | | | | |
| pH | 9.04 | NA | SU | 9.04 | SU | 5.0 - 12.0 | SU | Yes | | | |
| BOD5 | 8.5 | 2.0 | mg/L | 8.5 | mg/L | 250 | mg/L | Yes | | | |
| Total Phenol | 0.0377 | 0.0100 | mg/L | 0.003 | lbs/day | 1.67 | lbs/day | Yes | 20 | 0.0377 | Yes |
| Total Chromium | 0.0050 | 0.0040 | mg/L | 0.0004 | lbs/day | 0.83 | lbs/day | Yes | 40 | 0.0050 | Yes |
| Total Copper | 0.0274 | 0.0100 | mg/L | 0.002 | lbs/day | 0.67 | lbs/day | Yes | 16 | 0.0274 | Yes |
| Lead | ND | 0.0050 | mg/L | ND | lbs/day | 0.541 | lbs/day | Yes | 65 | ND | Yes |
| Total Mercury | ND | 0.0002 | mg/L | ND | lbs/day | 0.00033 | lbs/day | Yes | | ND | |
| Total Nickel | 0.0078 | 0.0100 | mg/L | 0.0007 | lbs/day | 1.17 | lbs/day | Yes | 14 | 0.008 | Yes |
| Zinc | 0.0133 | 0.0100 | mg/L | 0.001 | lbs/day | 2.046 | lbs/day | Yes | 25 | 0.0133 | Yes |
| Amendable Cyanide | 0.0364 | 0.0100 | mg/L | 0.003 | lbs/day | 2.59 | lbs/day | Yes | 6.2 | 0.0364 | Yes |
| Total PCB | ND | 0.057 | ug/L | ND | lbs/day | 0.0001 | lbs/day | Yes | 0.002 | ND | Yes |
| Aniline or Aniline Derivative | 5900 | 990 | ug/L | 5.900 | mg/L | * | mg/L | Yes | | | |
| Max Individual Purgeables | 77 | 25 | ug/L | 0.077 | mg/L | * | mg/L | Yes | | | |
| Total Suspended Solids | 77.6 | 4.0 | mg/L | 77.6 | mg/L | 250 | mg/L | Yes | | | |
| Total Phosphate** | 0.128 | 0.0100 | mg/L | 0.128 | mg/L | 15.35 | mg/L | Yes | | | |
| Total Flow (average) | 7.19 | | gpm | 10,351 | gpd | 50,000 | gpd | Yes | | | |

*Permit requires reporting of Aniline or Aniline Derivative and Max Individual Purgeables concentrations in excess of 0.01 mg/L.

**Analyzed by total phosphorus method SM 4500-P E

MAID - Maximum Allowable Instantaneous Discharge

| Flow Calculations | | | | | |
|-------------------------|-----------|-----------|-----------|-----------|-----------|
| | EW-1 | EW-2 | EW-3 | EW-4 | EW-5 |
| Initial Reading | 5,809,230 | 2,748,978 | 2,634,068 | 3,162,679 | 1,045,267 |
| Final Reading | 5,944,193 | 2,843,839 | 2,685,783 | 3,253,787 | 1,045,267 |
| Total Days in Period | 36 | | | | |
| Total Flow for Period | 372,647 | | gallons | | |
| Average Flow for Period | 7.19 | | gpm | | |

Compliance Confirmation

Discharge Monitoring Report for May 2010

| | |
|------------------|----------------------------|
| BSA Permit No. | 09-06-BU109 |
| Sample Date: | 05/03/10 |
| Sample Location: | Onsite Pump Station to BSA |

Prepared by: BBL
Date: 5/12/2010
Checked by: RTB
Date: 7/14/2010

| BSA Permit Parameter | Input Analytical Results | | | Converted Analytical Results | | BSA Daily Max Discharge Limit | | Permit Compliance | MAID mg/L | Quantity mg/L | Permit Compliance |
|-------------------------------|--------------------------|-----------------|------|------------------------------|---------|-------------------------------|---------|-------------------|-----------|---------------|-------------------|
| | Quantity | Reporting Limit | Unit | Quantity | Unit | Quantity | Unit | | | | |
| pH | 8.71 | NA | SU | 8.71 | SU | 5.0 - 12.0 | SU | Yes | | | |
| BOD5 | 8.9 | 2.0 | mg/L | 8.9 | mg/L | 250 | mg/L | Yes | | | |
| Total Phenol | 0.0220 | 0.0100 | mg/L | 0.002 | lbs/day | 1.67 | lbs/day | Yes | 20 | 0.0220 | Yes |
| Total Chromium | 0.0056 | 0.0040 | mg/L | 0.0005 | lbs/day | 0.83 | lbs/day | Yes | 40 | 0.0056 | Yes |
| Total Copper | 0.0147 | 0.0100 | mg/L | 0.001 | lbs/day | 0.67 | lbs/day | Yes | 16 | 0.0147 | Yes |
| Lead | ND | 0.0050 | mg/L | ND | lbs/day | 0.541 | lbs/day | Yes | 65 | ND | Yes |
| Total Mercury | ND | 0.0002 | mg/L | ND | lbs/day | 0.00033 | lbs/day | Yes | | ND | |
| Total Nickel | 0.0046 | 0.0100 | mg/L | 0.0004 | lbs/day | 1.17 | lbs/day | Yes | 14 | 0.005 | Yes |
| Zinc | 0.0098 | 0.0100 | mg/L | 0.001 | lbs/day | 2.046 | lbs/day | Yes | 25 | 0.0098 | Yes |
| Amendable Cyanide | 0.0635 | 0.0100 | mg/L | 0.0052 | lbs/day | 2.59 | lbs/day | Yes | 6.2 | 0.0635 | Yes |
| Total PCB | ND | 0.059 | ug/L | ND | lbs/day | 0.0001 | lbs/day | Yes | 0.002 | ND | Yes |
| Aniline or Aniline Derivative | 1600 | 390 | ug/L | 1.600 | mg/L | * | mg/L | Yes | | | |
| Max Individual Purgeables | 50 | 25 | ug/L | 0.050 | mg/L | * | mg/L | Yes | | | |
| Total Suspended Solids | ND | 4.0 | mg/L | ND | mg/L | 250 | mg/L | Yes | | | |
| Total Phosphate** | 0.529 | 0.0100 | mg/L | 0.529 | mg/L | 15.35 | mg/L | Yes | | | |
| Total Flow (average) | 6.81 | | gpm | 9,800 | gpd | 50,000 | gpd | Yes | | | |

*Permit requires reporting of Aniline or Aniline Derivative and Max Individual Purgeables concentrations in excess of 0.01 mg/L.

**Analyzed by total phosphorus method SM 4500-P E

MAID - Maximum Allowable Instantaneous Discharge

| Flow Calculations | | | | | | |
|--------------------------------|---------------|-----------|-----------|-----------|-----------|-----------|
| | EW-1 | EW-2 | EW-3 | EW-4 | EW-5 | |
| Initial Reading | 5,944,193 | 2,843,839 | 2,685,783 | 3,253,787 | 1,045,267 | 4/23/2010 |
| Final Reading | 5,983,790 | 2,878,966 | 2,699,968 | 3,262,878 | 1,045,267 | 5/3/2010 |
| Total Days in Period | 10 | | | | | |
| Total Flow for Period | 98,000 | | gallons | | | |
| Average Flow for Period | 6.81 | | gpm | | | |

Compliance Confirmation

Discharge Monitoring Report for June 2010

| | |
|------------------|----------------------------|
| BSA Permit No. | 09-06-BU109 |
| Sample Date: | 06/28/10 |
| Sample Location: | Onsite Pump Station to BSA |

Prepared by: BBL
 Date: 7/13/2010
 Checked by: RTB
 Date: 7/14/2010

| BSA Permit Parameter | Input Analytical Results | | | Converted Analytical Results | | BSA Daily Max Discharge Limit | | Permit Compliance | MAID mg/L | Quantity mg/L | Permit Compliance |
|-------------------------------|--------------------------|-----------------|------|------------------------------|---------|-------------------------------|---------|-------------------|-----------|---------------|-------------------|
| | Quantity | Reporting Limit | Unit | Quantity | Unit | Quantity | Unit | | | | |
| pH | 9.00 | NA | SU | 9.0 | SU | 5.0 - 12.0 | SU | Yes | | | |
| BOD5 | 33.8 | 2.0 | mg/L | 33.8 | mg/L | 250 | mg/L | Yes | | | |
| Total Phenol | 0.0561 | 0.0100 | mg/L | 0.002 | lbs/day | 1.67 | lbs/day | Yes | 20 | 0.0561 | Yes |
| Total Chromium | 0.0075 | 0.0040 | mg/L | 0.0002 | lbs/day | 0.83 | lbs/day | Yes | 40 | 0.0075 | Yes |
| Total Copper | 0.0053 | 0.0100 | mg/L | 0.0002 | lbs/day | 0.67 | lbs/day | Yes | 16 | 0.0053 | Yes |
| Lead | ND | 0.0050 | mg/L | ND | lbs/day | 0.541 | lbs/day | Yes | 65 | ND | Yes |
| Total Mercury | ND | 0.0002 | mg/L | ND | lbs/day | 0.00033 | lbs/day | Yes | | | |
| Total Nickel | 0.0042 | 0.0100 | mg/L | 0.0001 | lbs/day | 1.17 | lbs/day | Yes | 14 | 0.0042 | Yes |
| Zinc | 0.0161 | 0.0100 | mg/L | 0.0005 | lbs/day | 2.046 | lbs/day | Yes | 25 | 0.0161 | Yes |
| Amendable Cyanide | ND | 0.0100 | mg/L | ND | lbs/day | 2.59 | lbs/day | Yes | 6.2 | ND | Yes |
| Total PCB | ND | 0.059 | ug/L | ND | lbs/day | 0.0001 | lbs/day | Yes | 0.002 | ND | Yes |
| Aniline or Aniline Derivative | 6500 | 2100 | ug/L | 6.500 | mg/L | * | mg/L | Yes | | | |
| Max Individual Purgeables | 28 | 25 | ug/L | 0.028 | mg/L | * | mg/L | Yes | | | |
| Total Suspended Solids | 97.2 | 4.0 | mg/L | 97.2 | mg/L | 250 | mg/L | Yes | | | |
| Total Phosphate** | 0.716 | 0.0100 | mg/L | 0.716 | mg/L | 15.35 | mg/L | Yes | | | |
| Total Flow (average) | 2.44 | | gpm | 3,514 | gpd | 50,000 | gpd | Yes | | | |

*Permit requires reporting of Aniline or Aniline Derivative and Max Individual Purgeables concentrations in excess of 0.01 mg/L.

**Analyzed by total phosphorus method SM 4500-P E

MAID - Maximum Allowable Instantaneous Discharge

| Flow Calculations | | | | | | |
|--------------------------------|----------------|-----------|-----------|-----------|-----------|-----------|
| | EW-1 | EW-2 | EW-3 | EW-4 | EW-5 | |
| Initial Reading | 5,983,790 | 2,878,966 | 2,699,968 | 3,262,878 | 1,045,267 | 5/3/2010 |
| Final Reading | 6,048,852 | 2,971,042 | 2,725,094 | 3,273,649 | 1,049,022 | 6/28/2010 |
| Total Days in Period | 56 | | | | | |
| Total Flow for Period | 196,790 | | gallons | | | |
| Average Flow for Period | 2.44 | | gpm | | | |

Compliance Confirmation

Discharge Monitoring Report for July 2010

| | |
|------------------|----------------------------|
| BSA Permit No. | 09-06-BU109 |
| Sample Date: | 07/28/10 |
| Sample Location: | Onsite Pump Station to BSA |

Prepared by: BBL
Date: 8/11/2010
Checked by: RTB
Date: 10/7/2010

| BSA Permit Parameter | Input Analytical Results | | | Converted Analytical Results | | BSA Daily Max Discharge Limit | | Permit Compliance | MAID mg/L | Quantity mg/L | Permit Compliance |
|-------------------------------|--------------------------|-----------------|------|------------------------------|---------|-------------------------------|---------|-------------------|-----------|---------------|-------------------|
| | Quantity | Reporting Limit | Unit | Quantity | Unit | Quantity | Unit | | | | |
| pH | 8.97 | NA | SU | 8.97 | SU | 5.0 - 12.0 | SU | Yes | | | |
| BOD5 | 25.3 | 2.0 | mg/L | 25.3 | mg/L | 250 | mg/L | Yes | | | |
| Total Phenol | 0.104 | 0.0100 | mg/L | 0.011 | lbs/day | 1.67 | lbs/day | Yes | 20 | 0.1040 | Yes |
| Total Chromium | 0.0086 | 0.0040 | mg/L | 0.0009 | lbs/day | 0.83 | lbs/day | Yes | 40 | 0.0086 | Yes |
| Total Copper | 0.0073 | 0.0100 | mg/L | 0.001 | lbs/day | 0.67 | lbs/day | Yes | 16 | 0.0073 | Yes |
| Lead | 0.0043 | 0.0050 | mg/L | 0.0005 | lbs/day | 0.541 | lbs/day | Yes | 65 | 0.0043 | Yes |
| Total Mercury | ND | 0.0002 | mg/L | ND | lbs/day | 0.00033 | lbs/day | Yes | | ND | |
| Total Nickel | 0.0050 | 0.0100 | mg/L | 0.0005 | lbs/day | 1.17 | lbs/day | Yes | 14 | 0.005 | Yes |
| Zinc | 0.0168 | 0.0100 | mg/L | 0.002 | lbs/day | 2.046 | lbs/day | Yes | 25 | 0.0168 | Yes |
| Amendable Cyanide | ND | 0.0100 | mg/L | ND | lbs/day | 2.59 | lbs/day | Yes | 6.2 | ND | Yes |
| Total PCB | ND | 0.057 | ug/L | ND | lbs/day | 0.0001 | lbs/day | Yes | 0.002 | ND | Yes |
| Aniline or Aniline Derivative | 2700 | 380 | ug/L | 2.700 | mg/L | * | mg/L | Yes | | | |
| Max Individual Purgeables | 59 | 25 | ug/L | 0.059 | mg/L | * | mg/L | Yes | | | |
| Total Suspended Solids | 235 | 4.0 | mg/L | 235.0 | mg/L | 250 | mg/L | Yes | | | |
| Total Phosphate** | 1.18 | 0.0500 | mg/L | 1.180 | mg/L | 15.35 | mg/L | Yes | | | |
| Total Flow (average) | 8.90 | | gpm | 12,820 | gpd | 50,000 | gpd | Yes | | | |

*Permit requires reporting of Aniline or Aniline Derivative and Max Individual Purgeables concentrations in excess of 0.01 mg/L.

**Analyzed by total phosphorus method SM 4500-P E

MAID - Maximum Allowable Instantaneous Discharge

| Flow Calculations | | | | | |
|--------------------------------|----------------|-----------|-----------|-----------|-----------|
| | EW-1 | EW-2 | EW-3 | EW-4 | EW-5 |
| Initial Reading | 6,048,852 | 2,971,042 | 2,725,094 | 3,273,649 | 1,049,022 |
| Final Reading | 6,206,844 | 3,044,189 | 2,765,325 | 3,338,700 | 1,095,992 |
| Total Days in Period | 30 | | | | |
| Estimate Area D Contribution | 1,210 | | gallons | | |
| Total Flow for Period | 384,601 | | gallons | | |
| Average Flow for Period | 8.90 | | gpm | | |

Compliance Confirmation

Discharge Monitoring Report for August 2010

| | |
|------------------|----------------------------|
| BSA Permit No. | 09-06-BU109 |
| Sample Date: | 08/24/10 |
| Sample Location: | Onsite Pump Station to BSA |

Prepared by: BBL
 Date: 9/23/2010
 Checked by: RTB
 Date: 10/7/2010

| BSA Permit Parameter | Input Analytical Results | | | Converted Analytical Results | | BSA Daily Max Discharge Limit | | Permit Compliance | MAID mg/L | Quantity mg/L | Permit Compliance |
|-------------------------------|--------------------------|-----------------|------|------------------------------|---------|-------------------------------|---------|-------------------|-----------|---------------|-------------------|
| | Quantity | Reporting Limit | Unit | Quantity | Unit | Quantity | Unit | | | | |
| pH | 9.27 | NA | SU | 9.27 | SU | 5.0 - 12.0 | SU | Yes | | | |
| BOD5 | 13.8 | 2.0 | mg/L | 13.8 | mg/L | 250 | mg/L | Yes | | | |
| Total Phenol | 0.147 | 0.0100 | mg/L | 0.014 | lbs/day | 1.67 | lbs/day | Yes | 20 | 0.1470 | Yes |
| Total Chromium | 0.0087 | 0.0040 | mg/L | 0.0008 | lbs/day | 0.83 | lbs/day | Yes | 40 | 0.0087 | Yes |
| Total Copper | 0.0152 | 0.0100 | mg/L | 0.001 | lbs/day | 0.67 | lbs/day | Yes | 16 | 0.0152 | Yes |
| Lead | 0.0085 | 0.0050 | mg/L | 0.0008 | lbs/day | 0.541 | lbs/day | Yes | 65 | 0.0085 | Yes |
| Total Mercury | ND | 0.0002 | mg/L | ND | lbs/day | 0.00033 | lbs/day | Yes | | ND | |
| Total Nickel | 0.0048 | 0.0100 | mg/L | 0.0004 | lbs/day | 1.17 | lbs/day | Yes | 14 | 0.005 | Yes |
| Zinc | 0.0275 | 0.0100 | mg/L | 0.003 | lbs/day | 2.046 | lbs/day | Yes | 25 | 0.0275 | Yes |
| Amendable Cyanide | ND | 0.0100 | mg/L | ND | lbs/day | 2.59 | lbs/day | Yes | 6.2 | ND | Yes |
| Total PCB | ND | 0.057 | ug/L | ND | lbs/day | 0.0001 | lbs/day | Yes | 0.002 | ND | Yes |
| Aniline or Aniline Derivative | 3700 | 950 | ug/L | 3.700 | mg/L | * | mg/L | Yes | | | |
| Max Individual Purgeables | 110 | 25 | ug/L | 0.110 | mg/L | * | mg/L | Yes | | | |
| Total Suspended Solids | 146 | 4.0 | mg/L | 146.0 | mg/L | 250 | mg/L | Yes | | | |
| Total Phosphate** | 0.911 | 0.0100 | mg/L | 0.911 | mg/L | 15.35 | mg/L | Yes | | | |
| Total Flow (average) | 7.69 | | gpm | 11,073 | gpd | 50,000 | gpd | Yes | | | |

*Permit requires reporting of Aniline or Aniline Derivative and Max Individual Purgeables concentrations in excess of 0.01 mg/L.

**Analyzed by total phosphorus method SM 4500-P E

MAID - Maximum Allowable Instantaneous Discharge

Flow Calculations

Combined Effluent No. 1 and No. 2 Flow Totals (gallons)

| | | |
|----------------------|---------|-----------|
| Initial Reading | 164,964 | 7/28/2010 |
| Final Reading | 463,931 | 8/24/2010 |
| Total Days in Period | 27 | |

| | | |
|--------------------------------|----------------|---------|
| Total Flow for Period | 298,967 | gallons |
| Average Flow for Period | 7.69 | gpm |

Compliance Confirmation

Discharge Monitoring Report for September 2010

| | |
|------------------|----------------------------|
| BSA Permit No. | 09-06-BU109 |
| Sample Date: | 09/23/10 |
| Sample Location: | Onsite Pump Station to BSA |

Prepared by: RTB
Date: 10/13/2010
Checked by: BPN
Date: 10/14/2010

| BSA Permit Parameter | Input Analytical Results | | | Converted Analytical Results | | BSA Daily Max Discharge Limit | | Permit Compliance | MAID mg/L | Quantity mg/L | Permit Compliance |
|-------------------------------|--------------------------|-----------------|------|------------------------------|---------|-------------------------------|---------|-------------------|-----------|---------------|-------------------|
| | Quantity | Reporting Limit | Unit | Quantity | Unit | Quantity | Unit | | | | |
| pH | 8.69 | NA | SU | 8.7 | SU | 5.0 - 12.0 | SU | Yes | | | |
| BOD5 | 19.7 | 2.0 | mg/L | 19.7 | mg/L | 250 | mg/L | Yes | | | |
| Total Phenol | 0.0668 | 0.0100 | mg/L | 0.006 | lbs/day | 1.67 | lbs/day | Yes | 20 | 0.0668 | Yes |
| Total Chromium | 0.0087 | 0.0040 | mg/L | 0.0008 | lbs/day | 0.83 | lbs/day | Yes | 40 | 0.0087 | Yes |
| Total Copper | 0.0053 | 0.0100 | mg/L | 0.0005 | lbs/day | 0.67 | lbs/day | Yes | 16 | 0.0053 | Yes |
| Lead | 0.0065 | 0.0050 | mg/L | 0.0006 | lbs/day | 0.541 | lbs/day | Yes | 65 | 0.0065 | Yes |
| Total Mercury | ND | 0.0002 | mg/L | ND | lbs/day | 0.00033 | lbs/day | Yes | | | |
| Total Nickel | 0.0040 | 0.0100 | mg/L | 0.0004 | lbs/day | 1.17 | lbs/day | Yes | 14 | 0.0040 | Yes |
| Zinc | 0.0131 | 0.0100 | mg/L | 0.0012 | lbs/day | 2.046 | lbs/day | Yes | 25 | 0.0131 | Yes |
| Amendable Cyanide | ND | 0.0100 | mg/L | ND | lbs/day | 2.59 | lbs/day | Yes | 6.2 | ND | Yes |
| Total PCB | ND | 0.058 | ug/L | ND | lbs/day | 0.0001 | lbs/day | Yes | 0.002 | ND | Yes |
| Aniline or Aniline Derivative | 6900 | 5000 | ug/L | 6.900 | mg/L | * | mg/L | Yes | | | |
| Max Individual Purgeables | 84 | 25 | ug/L | 0.084 | mg/L | * | mg/L | Yes | | | |
| Total Suspended Solids | 156.0 | 4.0 | mg/L | 156.0 | mg/L | 250 | mg/L | Yes | | | |
| Total Phosphate** | 0.996 | 0.1000 | mg/L | 0.996 | mg/L | 15.35 | mg/L | Yes | | | |
| Total Flow (average) | 7.77 | | gpm | 11,187 | gpd | 50,000 | gpd | Yes | | | |

*Permit requires reporting of Aniline or Aniline Derivative and Max Individual Purgeables concentrations in excess of 0.01 mg/L.

**Analyzed by total phosphorus method SM 4500-P E

MAID - Maximum Allowable Instantaneous Discharge

| | | |
|---|----------------|-----------|
| Flow Calculations | | |
| Combined Effluent No. 1 and No. 2 Flow Totals (gallons) | | |
| Initial Reading | 463,931 | 8/24/2010 |
| Final Reading | 799,542 | 9/23/2010 |
| Total Days in Period | 30 | |
| Total Flow for Period | 335,611 | gallons |
| Average Flow for Period | 7.77 | gpm |

Compliance Confirmation

Discharge Monitoring Report for October 2010

| | |
|------------------|----------------------------|
| BSA Permit No. | 09-06-BU109 |
| Sample Date: | 10/14/10 |
| Sample Location: | Onsite Pump Station to BSA |

Prepared by: BBL
Date: 10/27/2010
Checked by: RTB
Date: 1/4/2011

| BSA Permit Parameter | Input Analytical Results | | | Converted Analytical Results | | BSA Daily Max Discharge Limit | | Permit Compliance | MAID mg/L | Quantity mg/L | Permit Compliance |
|-------------------------------|--------------------------|-----------------|------|------------------------------|---------|-------------------------------|---------|-------------------|-----------|---------------|-------------------|
| | Quantity | Reporting Limit | Unit | Quantity | Unit | Quantity | Unit | | | | |
| pH | 8.62 | NA | SU | 8.62 | SU | 5.0 - 12.0 | SU | Yes | | | |
| BOD5 | 17.9 | 2.0 | mg/L | 17.9 | mg/L | 250 | mg/L | Yes | | | |
| Total Phenol | 0.0438 | 0.0100 | mg/L | 0.004 | lbs/day | 1.67 | lbs/day | Yes | 20 | 0.0438 | Yes |
| Total Chromium | 0.0067 | 0.0040 | mg/L | 0.0007 | lbs/day | 0.83 | lbs/day | Yes | 40 | 0.0067 | Yes |
| Total Copper | 0.0020 | 0.0100 | mg/L | 0.000 | lbs/day | 0.67 | lbs/day | Yes | 16 | 0.0020 | Yes |
| Lead | ND | 0.0050 | mg/L | ND | lbs/day | 0.541 | lbs/day | Yes | 65 | ND | Yes |
| Total Mercury | ND | 0.0002 | mg/L | ND | lbs/day | 0.00033 | lbs/day | Yes | | ND | |
| Total Nickel | 0.0030 | 0.0100 | mg/L | 0.0003 | lbs/day | 1.17 | lbs/day | Yes | 14 | 0.003 | Yes |
| Zinc | 0.0112 | 0.0100 | mg/L | 0.001 | lbs/day | 2.046 | lbs/day | Yes | 25 | 0.0112 | Yes |
| Amendable Cyanide | 0.0345 | 0.0100 | mg/L | 0.003 | lbs/day | 2.59 | lbs/day | Yes | 6.2 | 0.0345 | Yes |
| Total PCB | ND | 0.058 | ug/L | ND | lbs/day | 0.0001 | lbs/day | Yes | 0.002 | ND | Yes |
| Aniline or Aniline Derivative | 4000 | 990 | ug/L | 4.000 | mg/L | * | mg/L | Yes | | | |
| Max Individual Purgeables | 93 | 25 | ug/L | 0.093 | mg/L | * | mg/L | Yes | | | |
| Total Suspended Solids | 112 | 4.0 | mg/L | 112.0 | mg/L | 250 | mg/L | Yes | | | |
| Total Phosphate** | 0.918 | 0.0100 | mg/L | 0.918 | mg/L | 15.35 | mg/L | Yes | | | |
| Total Flow (average) | 8.38 | | gpm | 12,074 | gpd | 50,000 | gpd | Yes | | | |

*Permit requires reporting of Aniline or Aniline Derivative and Max Individual Purgeables concentrations in excess of 0.01 mg/L.

**Analyzed by total phosphorus method SM 4500-P E

MAID - Maximum Allowable Instantaneous Discharge

| | | |
|---|----------------|------------|
| Flow Calculations | | |
| Combined Effluent No. 1 and No. 2 Flow Totals (gallons) | | |
| Initial Reading | 799,542 | 9/23/2010 |
| Final Reading | 1,053,100 | 10/14/2010 |
| Total Days in Period | 21 | |
| Total Flow for Period | 253,558 | gallons |
| Average Flow for Period | 8.38 | gpm |

Compliance Confirmation

Discharge Monitoring Report for November 2010

| | |
|------------------|----------------------------|
| BSA Permit No. | 09-06-BU109 |
| Sample Date: | 11/18/10 |
| Sample Location: | Onsite Pump Station to BSA |

Prepared by: BBL
 Date: 11/29/2010
 Checked by: RTB
 Date: 1/4/2011

| BSA Permit Parameter | Input Analytical Results | | | Converted Analytical Results | | BSA Daily Max Discharge Limit | | Permit Compliance | MAID mg/L | Quantity mg/L | Permit Compliance |
|-------------------------------|--------------------------|-----------------|------|------------------------------|---------|-------------------------------|---------|-------------------|-----------|---------------|-------------------|
| | Quantity | Reporting Limit | Unit | Quantity | Unit | Quantity | Unit | | | | |
| pH | 8.71 | NA | SU | 8.71 | SU | 5.0 - 12.0 | SU | Yes | | | |
| BOD5 | 25.3 | 2.0 | mg/L | 25.3 | mg/L | 250 | mg/L | Yes | | | |
| Total Phenol | 0.0434 | 0.0100 | mg/L | 0.004 | lbs/day | 1.67 | lbs/day | Yes | 20 | 0.0434 | Yes |
| Total Chromium | 0.0091 | 0.0040 | mg/L | 0.0009 | lbs/day | 0.83 | lbs/day | Yes | 40 | 0.0091 | Yes |
| Total Copper | 0.0047 | 0.0100 | mg/L | 0.000 | lbs/day | 0.67 | lbs/day | Yes | 16 | 0.0047 | Yes |
| Lead | 0.0061 | 0.0050 | mg/L | 0.0006 | lbs/day | 0.541 | lbs/day | Yes | 65 | 0.0061 | Yes |
| Total Mercury | ND | 0.0002 | mg/L | ND | lbs/day | 0.00033 | lbs/day | Yes | | ND | |
| Total Nickel | 0.0038 | 0.0100 | mg/L | 0.0004 | lbs/day | 1.17 | lbs/day | Yes | 14 | 0.004 | Yes |
| Zinc | 0.0148 | 0.0100 | mg/L | 0.001 | lbs/day | 2.046 | lbs/day | Yes | 25 | 0.0148 | Yes |
| Amendable Cyanide | ND | 0.0100 | mg/L | ND | lbs/day | 2.59 | lbs/day | Yes | 6.2 | ND | Yes |
| Total PCB | ND | 0.062 | ug/L | ND | lbs/day | 0.0001 | lbs/day | Yes | 0.002 | ND | Yes |
| Aniline or Aniline Derivative | 6000 | 2000 | ug/L | 6.000 | mg/L | * | mg/L | Yes | | | |
| Max Individual Purgeables | 120 | 25 | ug/L | 0.120 | mg/L | * | mg/L | Yes | | | |
| Total Suspended Solids | 156 | 4.0 | mg/L | 156.0 | mg/L | 250 | mg/L | Yes | | | |
| Total Phosphate** | 1.38 | 0.100 | mg/L | 1.380 | mg/L | 15.35 | mg/L | Yes | | | |
| Total Flow (average) | 8.04 | | gpm | 11,581 | gpd | 50,000 | gpd | Yes | | | |

*Permit requires reporting of Aniline or Aniline Derivative and Max Individual Purgeables concentrations in excess of 0.01 mg/L.

**Analyzed by total phosphorus method SM 4500-P E

MAID - Maximum Allowable Instantaneous Discharge

| | | |
|---|----------------|----------------|
| Flow Calculations | | |
| Combined Effluent No. 1 and No. 2 Flow Totals (gallons) | | |
| Initial Reading | 1,053,100 | 10/14/2010 |
| Final Reading | 1,458,436 | 11/18/2010 |
| Total Days in Period | 35 | |
| Total Flow for Period | 405,336 | gallons |
| Average Flow for Period | 8.04 | gpm |

Compliance Confirmation

Discharge Monitoring Report for December 2010

| | |
|------------------|----------------------------|
| BSA Permit No. | 09-06-BU109 |
| Sample Date: | 12/21/10 |
| Sample Location: | Onsite Pump Station to BSA |

Prepared by: BBL
Date: 1/4/2011
Checked by: RTB
Date: 1/4/2011

| BSA Permit Parameter | Input Analytical Results | | | Converted Analytical Results | | BSA Daily Max Discharge Limit | | Permit Compliance | MAID mg/L | Quantity mg/L | Permit Compliance |
|-------------------------------|--------------------------|-----------------|------|------------------------------|---------|-------------------------------|---------|-------------------|-----------|---------------|-------------------|
| | Quantity | Reporting Limit | Unit | Quantity | Unit | Quantity | Unit | | | | |
| pH | 8.19 | NA | SU | 8.2 | SU | 5.0 - 12.0 | SU | Yes | | | |
| BOD5 | 10.7 | 2.0 | mg/L | 10.7 | mg/L | 250 | mg/L | Yes | | | |
| Total Phenol | 0.0198 | 0.0100 | mg/L | 0.001 | lbs/day | 1.67 | lbs/day | Yes | 20 | 0.0198 | Yes |
| Total Chromium | 0.0058 | 0.0040 | mg/L | 0.0004 | lbs/day | 0.83 | lbs/day | Yes | 40 | 0.0058 | Yes |
| Total Copper | 0.0069 | 0.0100 | mg/L | 0.0005 | lbs/day | 0.67 | lbs/day | Yes | 16 | 0.0069 | Yes |
| Lead | ND | 0.0050 | mg/L | ND | lbs/day | 0.541 | lbs/day | Yes | 65 | ND | Yes |
| Total Mercury | ND | 0.0002 | mg/L | ND | lbs/day | 0.00033 | lbs/day | Yes | | ND | |
| Total Nickel | 0.0070 | 0.0100 | mg/L | 0.0005 | lbs/day | 1.17 | lbs/day | Yes | 14 | 0.0070 | Yes |
| Zinc | 0.0120 | 0.0100 | mg/L | 0.0008 | lbs/day | 2.046 | lbs/day | Yes | 25 | 0.0120 | Yes |
| Amendable Cyanide | ND | 0.0100 | mg/L | ND | lbs/day | 2.59 | lbs/day | Yes | 6.2 | ND | Yes |
| Total PCB | ND | 0.058 | ug/L | ND | lbs/day | 0.0001 | lbs/day | Yes | 0.002 | ND | Yes |
| Aniline or Aniline Derivative | 1800 | 390 | ug/L | 1.800 | mg/L | * | mg/L | Yes | | | |
| Max Individual Purgeables | 82 | 25 | ug/L | 0.082 | mg/L | * | mg/L | Yes | | | |
| Total Suspended Solids | 75.6 | 4.0 | mg/L | 75.6 | mg/L | 250 | mg/L | Yes | | | |
| Total Phosphate** | 0.279 | 0.0500 | mg/L | 0.279 | mg/L | 15.35 | mg/L | Yes | | | |
| Total Flow (average) | 5.62 | | gpm | 8,096 | gpd | 50,000 | gpd | Yes | | | |

*Permit requires reporting of Aniline or Aniline Derivative and Max Individual Purgeables concentrations in excess of 0.01 mg/L.

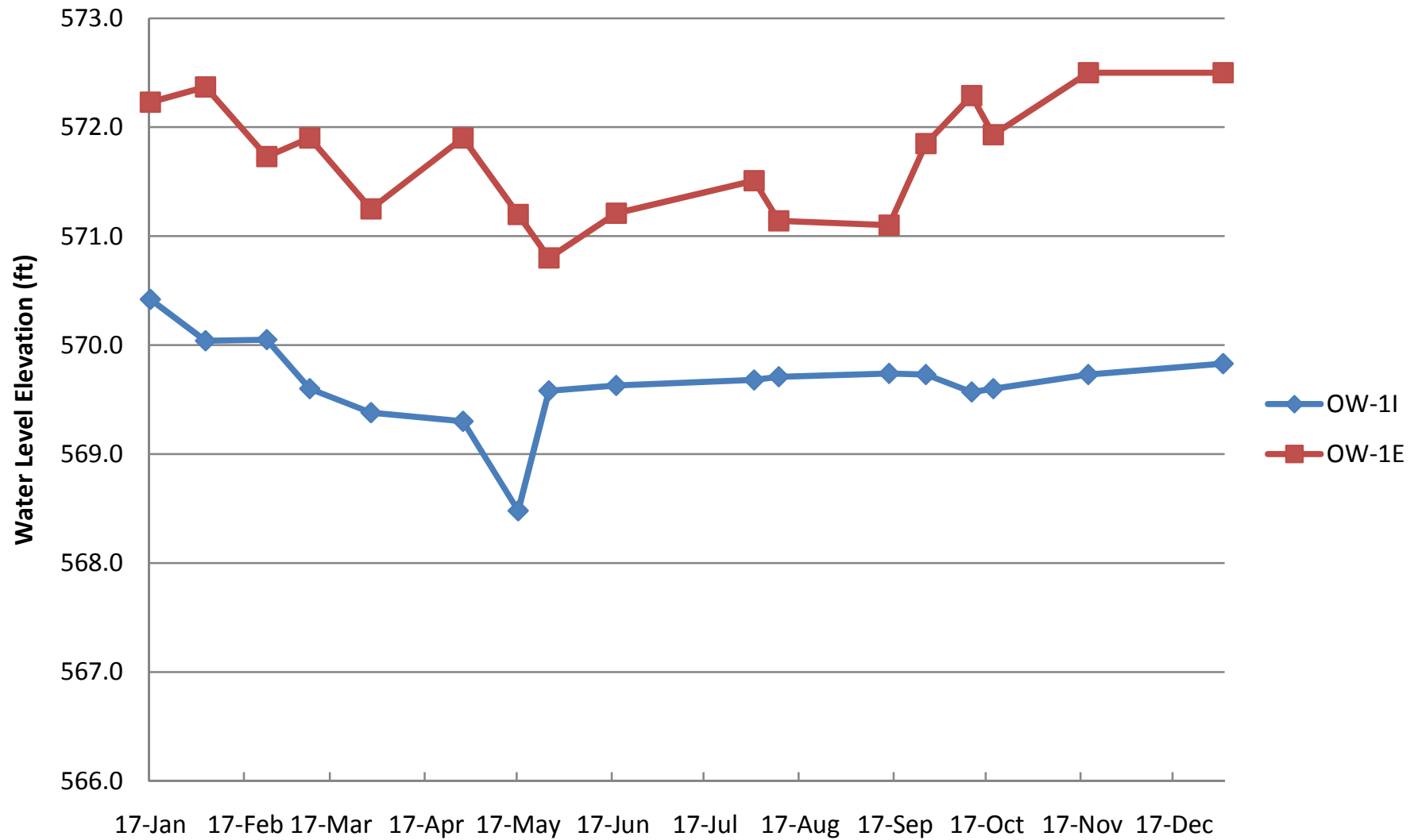
**Analyzed by total phosphorus method SM 4500-P E

MAID - Maximum Allowable Instantaneous Discharge

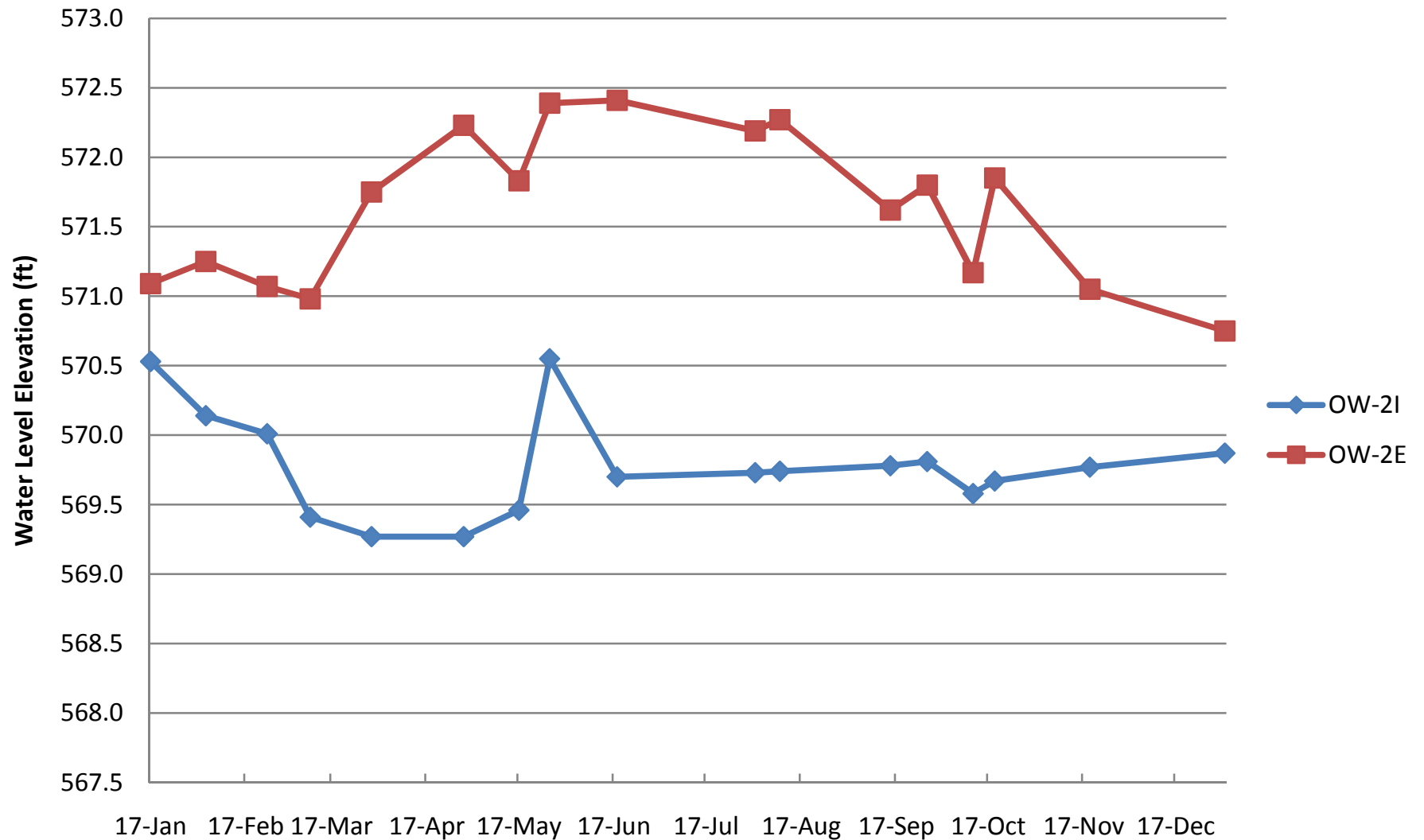
| | | |
|---|----------------|------------|
| Flow Calculations | | |
| Combined Effluent No. 1 and No. 2 Flow Totals (gallons) | | |
| Initial Reading | 1,458,436 | 11/18/2010 |
| Final Reading | 1,725,599 | 12/21/2010 |
| Total Days in Period | 33 | |
| Total Flow for Period | 267,163 | gallons |
| Average Flow for Period | 5.62 | gpm |

APPENDIX B
OBSERVATION WELL HYDROGRAPHS
AND WATER LEVEL DATA

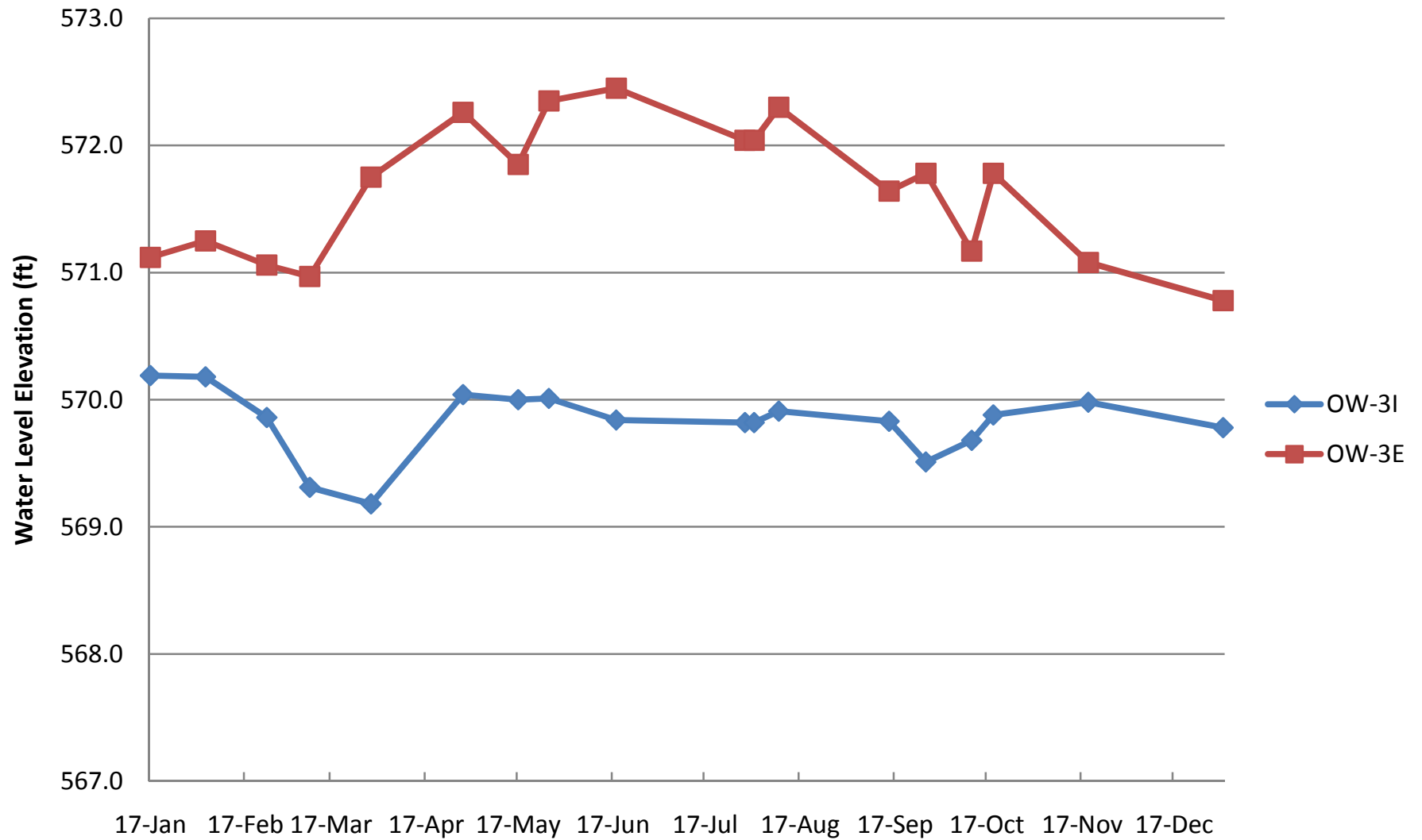
**Area D - Observation and River Wells
OW-1E and OW-1I**



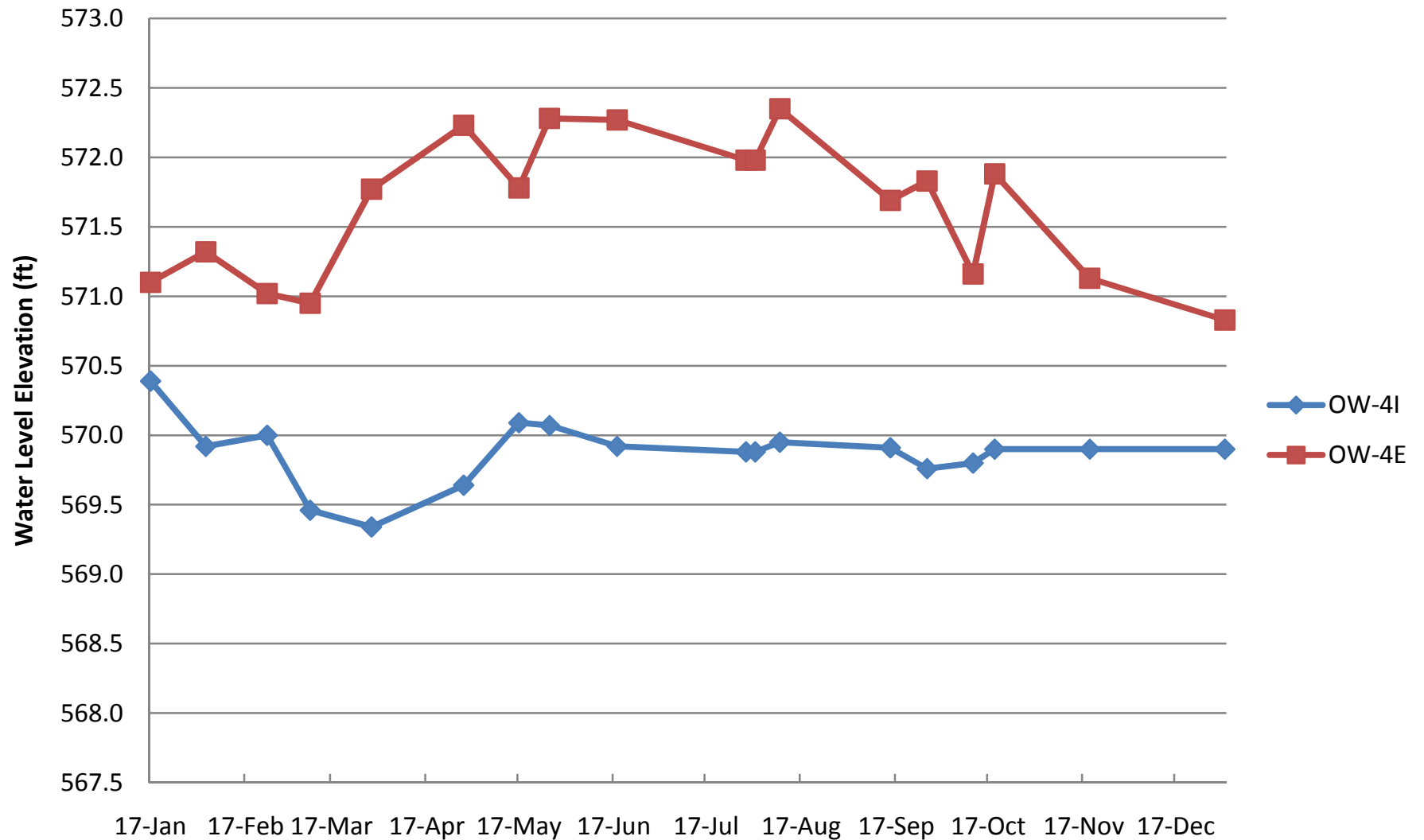
**Area D - Observation and River Wells
OW-2E and OW-2I**



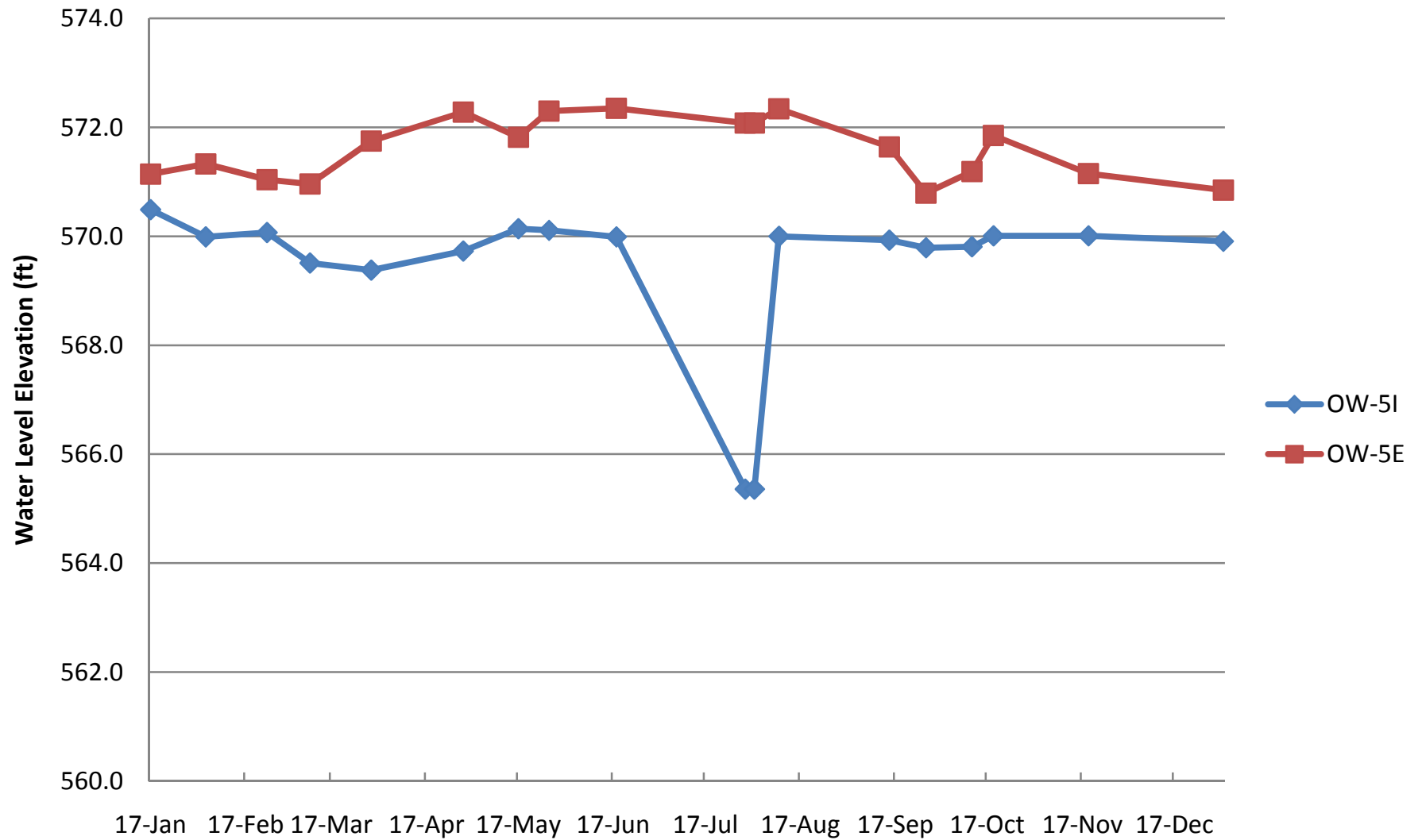
**Area D - Observation and River Wells
OW-3E and OW-3I**



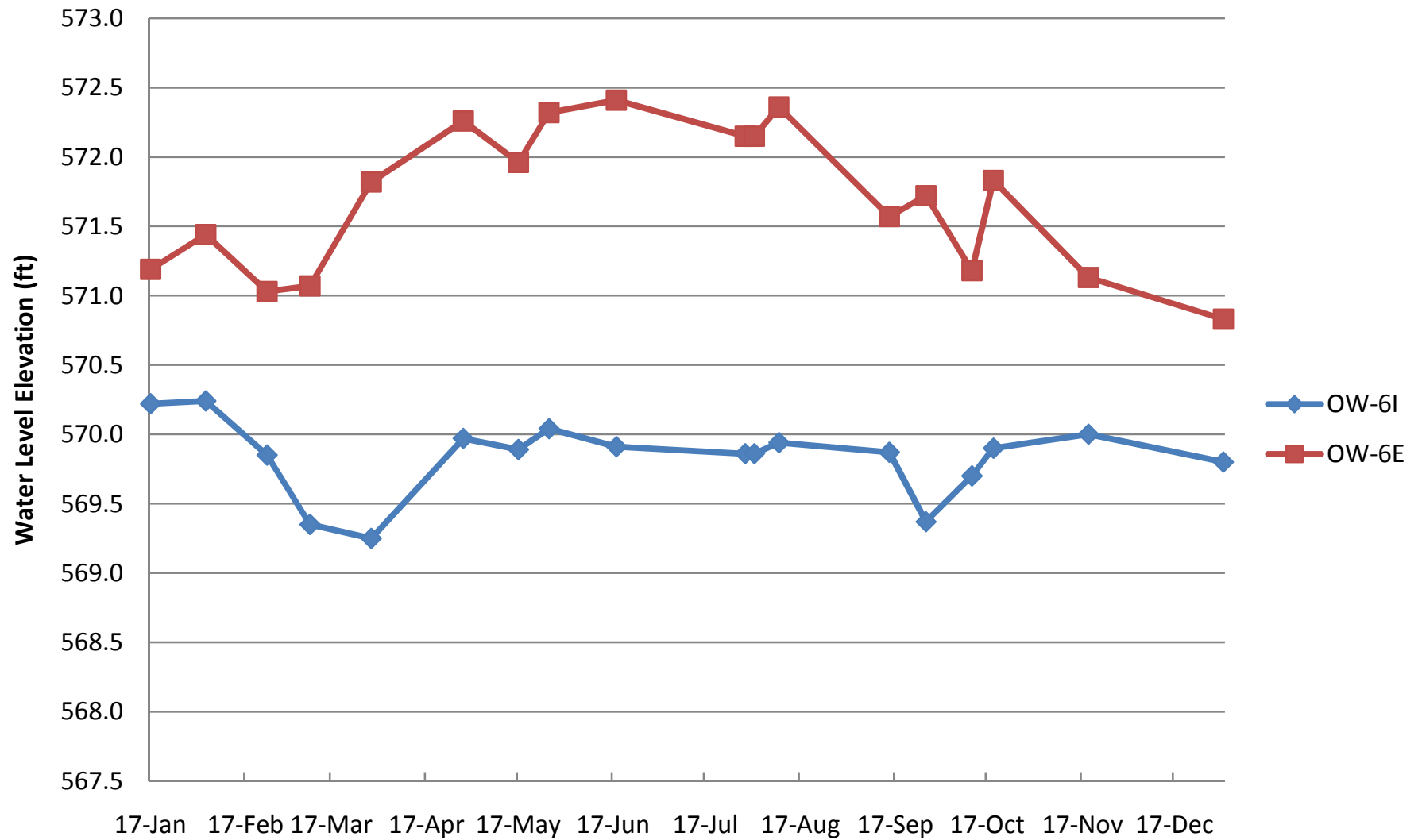
**Area D - Observation and River Wells
OW-4E and OW-4I**



**Area D - Observation and River Wells
OW-5E and OW-5I**



Area D - Observation and River Wells OW-6E and OW-6I



Buffalo Color - Monitoring Well Levels and Totalizer Readings - 2010

Landfill Monitoring Well - Groundwater Elevation (MSL) (ft)

| Well | Pt Elev. | 17-Jan | 4-Feb | 24-Feb | 10-Mar | 30-Mar | 29-Apr | 17-May | 27-May | 18-Jun | 30-Jul | 2-Aug | 10-Aug | 15-Sep | 27-Sep | 12-Oct | 19-Oct | 19-Nov | 2-Jan |
|-------|----------|--------|-------|--------|--------|--------|--------|--------|--------|--------|--------|-------|--------|--------|--------|--------|--------|--------|-------|
| OW-1I | 587.80 | 570.4 | 570.0 | 570.1 | 569.6 | 569.4 | 569.3 | 568.5 | 569.6 | 569.6 | 569.7 | 569.7 | 569.7 | 569.6 | 569.6 | 569.7 | 569.8 | 569.7 | |
| OW-2I | 588.37 | 570.5 | 570.1 | 570.0 | 569.4 | 569.3 | 569.3 | 569.5 | 570.6 | 569.7 | 569.7 | 569.7 | 569.8 | 569.8 | 569.6 | 569.7 | 569.8 | 569.9 | 569.8 |
| OW-3I | 588.38 | 570.2 | 570.2 | 569.9 | 569.3 | 569.2 | 570.0 | 570.0 | 570.0 | 569.8 | 569.8 | 569.8 | 569.9 | 569.8 | 569.5 | 569.7 | 569.9 | 570.0 | 569.8 |
| OW-4I | 588.10 | 570.4 | 569.9 | 570.0 | 569.5 | 569.3 | 569.6 | 570.1 | 570.1 | 569.9 | 569.9 | 569.9 | 570.0 | 569.9 | 569.8 | 569.8 | 569.9 | 569.9 | 569.9 |
| OW-5I | 588.11 | 570.5 | 570.0 | 570.1 | 569.5 | 569.4 | 569.7 | 570.1 | 570.1 | 570.0 | 565.4 | 565.4 | 570.0 | 569.9 | 569.8 | 569.8 | 570.0 | 570.0 | 569.9 |
| OW-6I | 589.60 | 570.2 | 570.2 | 569.9 | 569.4 | 569.3 | 570.0 | 569.9 | 570.0 | 569.9 | 569.9 | 569.9 | 569.9 | 569.9 | 569.4 | 569.7 | 569.9 | 570.0 | 569.8 |

Landfill Monitoring Well - Distance Between Water Level and Top of Well Casing (ft)

| Well | Pt Elev. | 17-Jan | 4-Feb | 24-Feb | 10-Mar | 30-Mar | 29-Apr | 17-May | 27-May | 18-Jun | 30-Jul | 2-Aug | 10-Aug | 15-Sep | 27-Sep | 12-Oct | 19-Oct | 19-Nov | 2-Jan |
|-------|----------|--------|-------|--------|--------|--------|--------|--------|--------|--------|--------|-------|--------|--------|--------|--------|--------|--------|-------|
| OW-1I | 587.80 | 17.4 | 17.8 | 17.8 | 18.2 | 18.4 | 18.5 | 19.3 | 18.2 | 18.2 | 18.1 | 18.1 | 18.1 | 18.1 | 18.2 | 18.2 | 18.1 | 18.0 | 18.1 |
| OW-2I | 588.37 | 17.8 | 18.2 | 18.4 | 19.0 | 19.1 | 19.1 | 18.9 | 17.8 | 18.7 | 18.6 | 18.6 | 18.6 | 18.6 | 18.8 | 18.7 | 18.6 | 18.5 | 18.6 |
| OW-3I | 588.38 | 18.2 | 18.2 | 18.5 | 19.1 | 19.2 | 18.3 | 18.4 | 18.4 | 18.5 | 18.6 | 18.6 | 18.5 | 18.6 | 18.9 | 18.7 | 18.5 | 18.4 | 18.6 |
| OW-4I | 588.10 | 17.7 | 18.2 | 18.1 | 18.6 | 18.8 | 18.5 | 18.0 | 18.0 | 18.2 | 18.2 | 18.2 | 18.2 | 18.2 | 18.3 | 18.3 | 18.2 | 18.2 | 18.2 |
| OW-5I | 588.11 | 17.6 | 18.1 | 18.0 | 18.6 | 18.7 | 18.4 | 18.0 | 18.0 | 18.1 | 22.8 | 22.8 | 18.1 | 18.2 | 18.3 | 18.3 | 18.1 | 18.1 | 18.2 |
| OW-6I | 589.60 | 19.4 | 19.4 | 19.8 | 20.3 | 20.4 | 19.6 | 19.7 | 19.6 | 19.7 | 19.7 | 19.7 | 19.7 | 19.7 | 20.2 | 19.9 | 19.7 | 19.6 | 19.8 |

River Monitoring Well - Groundwater Elevation (MSL) (ft)

| Well | Pt Elev. | 17-Jan | 4-Feb | 24-Feb | 10-Mar | 30-Mar | 29-Apr | 17-May | 27-May | 18-Jun | 30-Jul | 2-Aug | 10-Aug | 15-Sep | 27-Sep | 12-Oct | 19-Oct | 19-Nov | 2-Jan |
|-------|----------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| OW-1E | 583.20 | 571.21 | 571.51 | 571.14 | 571.10 | 571.85 | 572.29 | 571.93 | 572.50 | 572.50 | 565.42 | 572.23 | 572.37 | 571.73 | 571.90 | 571.25 | 571.90 | 571.20 | 570.80 |
| OW-2E | 583.05 | 571.09 | 571.25 | 571.07 | 570.98 | 571.75 | 572.23 | 571.83 | 572.39 | 572.41 | 567.45 | 572.19 | 572.27 | 571.62 | 571.80 | 571.17 | 571.85 | 571.05 | 570.75 |
| OW-3E | 582.68 | 571.12 | 571.25 | 571.06 | 570.97 | 571.75 | 572.26 | 571.85 | 572.35 | 572.45 | 572.04 | 572.04 | 572.30 | 571.64 | 571.78 | 571.17 | 571.78 | 571.08 | 570.78 |
| OW-4E | 582.93 | 571.10 | 571.32 | 571.02 | 570.95 | 571.77 | 572.23 | 571.78 | 572.28 | 572.27 | 571.98 | 571.98 | 572.35 | 571.69 | 571.83 | 571.16 | 571.88 | 571.13 | 570.83 |
| OW-5E | 582.65 | 571.14 | 571.33 | 571.04 | 570.96 | 571.75 | 572.28 | 571.82 | 572.30 | 572.35 | 572.08 | 572.08 | 572.34 | 571.64 | 570.79 | 571.19 | 571.85 | 571.15 | 570.85 |
| OW-6E | 583.23 | 571.19 | 571.44 | 571.03 | 571.07 | 571.82 | 572.26 | 571.96 | 572.32 | 572.41 | 572.15 | 572.15 | 572.36 | 571.57 | 571.72 | 571.18 | 571.83 | 571.13 | 570.83 |

River Monitoring Well - Distance Between Water Level and Top of Well Casing (ft)

| Well | Pt Elev. | 17-Jan | 4-Feb | 24-Feb | 10-Mar | 30-Mar | 29-Apr | 17-May | 27-May | 18-Jun | 30-Jul | 2-Aug | 10-Aug | 15-Sep | 27-Sep | 12-Oct | 19-Oct | 19-Nov | 2-Jan |
|-------|----------|--------|-------|--------|--------|--------|--------|--------|--------|--------|--------|-------|--------|--------|--------|--------|--------|--------|-------|
| OW-1E | 583.20 | 12.0 | 11.7 | 12.1 | 12.1 | 11.4 | 10.9 | 11.3 | 10.7 | 10.7 | 17.8 | 11.0 | 10.8 | 11.5 | 11.3 | 12.0 | 11.3 | 12.0 | 12.4 |
| OW-2E | 583.05 | 12.0 | 11.8 | 12.0 | 12.1 | 11.3 | 10.8 | 11.2 | 10.7 | 10.6 | 15.6 | 10.9 | 10.8 | 11.4 | 11.3 | 11.9 | 11.2 | 12.0 | 12.3 |
| OW-3E | 582.68 | 11.6 | 11.4 | 11.6 | 11.7 | 10.9 | 10.4 | 10.8 | 10.3 | 10.2 | 10.6 | 10.6 | 10.4 | 11.0 | 10.9 | 11.5 | 10.9 | 11.6 | 11.9 |
| OW-4E | 582.93 | 11.8 | 11.6 | 11.9 | 12.0 | 11.2 | 10.7 | 11.2 | 10.7 | 10.7 | 11.0 | 11.0 | 10.6 | 11.2 | 11.1 | 11.8 | 11.1 | 11.8 | 12.1 |
| OW-5E | 582.65 | 11.5 | 11.3 | 11.6 | 11.7 | 10.9 | 10.4 | 10.8 | 10.4 | 10.3 | 10.6 | 10.6 | 10.3 | 11.0 | 11.9 | 11.5 | 10.8 | 11.5 | 11.8 |
| OW-6E | 583.23 | 12.0 | 11.8 | 12.2 | 12.2 | 11.4 | 11.0 | 11.3 | 10.9 | 10.8 | 11.1 | 11.1 | 10.9 | 11.7 | 11.5 | 12.1 | 11.4 | 12.1 | 12.4 |

Flow Totalizer Readings (gal)

| Vault | 17-Jan | 4-Feb | 24-Feb | 10-Mar | 30-Mar | 29-Apr | 17-May | 27-May | 18-Jun | 30-Jul | 2-Aug | 10-Aug | 15-Sep | 27-Sep | 12-Oct | 19-Oct | 19-Nov | 2-Jan |
|-------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|-------|---------|---------|---------|---------|---------|---------|---------|
| EW-1 | 1570300 | 1571840 | 1572850 | 1578060 | 1580190 | 1582790 | 1583940 | 1584100 | 1584100 | 1584160 | | 1584160 | 1584160 | 1584610 | 1584700 | 1584700 | 1584880 | 1585400 |
| EW-2 | 1637910 | 1637910 | 1637910 | 1637910 | 1637910 | 1637910 | 1637910 | 1637910 | 1637910 | 1637910 | | 1637910 | 1637910 | 1637910 | 1637910 | 1637910 | 1637910 | 1637910 |
| EW-3 | 912030 | 920510 | 926190 | 952560 | 972300 | 1000140 | 1020010 | 1021730 | 1021730 | 1022470 | | 1022470 | 1022470 | 1033030 | 1036030 | 1036030 | 1038600 | 1045910 |
| EW-4 | 1688090 | 1688090 | 1693010 | 1719060 | 1731540 | 1745360 | 1755240 | 1756120 | 1756120 | 1756530 | | 1756530 | 1756530 | 1763360 | 1765590 | 1765590 | 1767310 | 1772550 |

Water Level Difference Between River Wells and Landfill Wells (ft)

| Wells | 17-Jan | 4-Feb | 24-Feb | 10-Mar | 30-Mar | 29-Apr | 17-May | 27-May | 18-Jun | 30-Jul | 2-Aug | 10-Aug | 15-Sep | 27-Sep | 12-Oct | 19-Oct | 19-Nov | 2-Jan |
|---------------|--------|-------|--------|--------|--------|--------|--------|--------|--------|--------|-------|--------|--------|--------|--------|--------|--------|-------|
| OW-1E & OW-1I | 0.79 | 1.47 | 1.09 | 1.50 | 2.47 | 2.99 | 3.45 | 2.92 | 2.87 | NR | 2.52 | 2.63 | 2.00 | 2.33 | 1.65 | 2.17 | 1.37 | 1.10 |
| OW-2E & OW-2I | 0.56 | 1.11 | 1.06 | 1.57 | 2.48 | 2.96 | 2.37 | 1.84 | 2.71 | NR | 2.45 | 2.49 | 1.81 | 2.22 | 1.50 | 2.08 | 1.18 | 0.99 |
| OW-3E & OW-3I | 0.93 | 1.07 | 1.20 | 1.66 | 2.57 | 2.22 | 1.85 | 2.34 | 2.61 | 2.22 | 2.22 | 2.39 | 1.81 | 2.27 | 1.49 | 1.90 | 1.10 | 1.00 |
| OW-4E & OW-4I | 0.71 | 1.40 | 1.02 | 1.49 | 2.43 | 2.59 | 1.69 | 2.21 | 2.35 | 2.10 | 2.10 | 2.40 | 1.78 | 2.07 | 1.36 | 1.98 | 1.23 | 0.93 |
| OW-5E & OW-5I | 0.65 | 1.34 | 0.97 | 1.45 | 2.37 | 2.55 | 1.68 | 2.19 | 2.36 | 6.72 | 6.72 | 2.34 | 1.71 | 1.00 | 1.38 | 1.84 | 1.14 | 0.94 |
| OW-6E & OW-6I | 0.97 | 1.20 | 1.18 | 1.72 | 2.57 | 2.29 | 2.07 | 2.28 | 2.50 | 2.29 | 2.29 | 2.42 | 1.70 | 2.35 | 1.48 | 1.93 | 1.13 | 1.03 |
| Average | 0.77 | 1.26 | 1.09 | 1.56 | 2.48 | 2.60 | 2.18 | 2.30 | 2.57 | 3.33 | 3.05 | 2.44 | 1.80 | 2.04 | 1.48 | 1.98 | 1.19 | 1.00 |

NR - Water levels Not Recorded

APPENDIX C

GROUNDWATER GRADIENT ACROSS CONTAINMENT WALL

Water Level Difference Between River Wells and Observation Wells (ft)

| Wells | 17-Jan | 4-Feb | 24-Feb | 10-Mar | 30-Mar | 29-Apr | 17-May | 27-May | 18-Jun | 2-Aug | 10-Aug | 15-Sep | 27-Sep | 12-Oct | 19-Oct | 19-Nov | Average |
|-------------------|--------|-------|--------|--------|--------|--------|--------|--------|--------|-------|--------|--------|--------|--------|--------|--------|---------|
| (OW-1E) - (OW-1I) | 0.79 | 1.47 | 1.09 | 1.50 | 2.47 | 2.99 | 3.45 | 2.92 | 2.87 | 2.52 | 2.63 | 2.00 | 2.33 | 1.65 | 2.17 | 1.37 | 2.14 |
| (OW-2E) - (OW-2I) | 0.56 | 1.11 | 1.06 | 1.57 | 2.48 | 2.96 | 2.37 | 1.84 | 2.71 | 2.45 | 2.49 | 1.81 | 2.22 | 1.50 | 2.08 | 1.18 | 1.90 |
| (OW-3E) - (OW-3I) | 0.93 | 1.07 | 1.20 | 1.66 | 2.57 | 2.22 | 1.85 | 2.34 | 2.61 | 2.22 | 2.39 | 1.81 | 2.27 | 1.49 | 1.90 | 1.10 | 1.99 |
| (OW-4E) - (OW-4I) | 0.71 | 1.40 | 1.02 | 1.49 | 2.43 | 2.59 | 1.69 | 2.21 | 2.35 | 2.10 | 2.40 | 1.78 | 2.07 | 1.36 | 1.98 | 1.23 | 1.93 |
| (OW-5E) - (OW-5I) | 0.65 | 1.34 | 0.97 | 1.45 | 2.37 | 2.55 | 1.68 | 2.19 | 2.36 | 6.72 | 2.34 | 1.71 | 1.00 | 1.38 | 1.84 | 1.14 | 2.40 |
| (OW-6E) - (OW-6I) | 0.97 | 1.20 | 1.18 | 1.72 | 2.57 | 2.29 | 2.07 | 2.28 | 2.50 | 2.29 | 2.42 | 1.70 | 2.35 | 1.48 | 1.93 | 1.13 | 2.02 |
| Average | 0.77 | 1.26 | 1.09 | 1.56 | 2.48 | 2.60 | 2.18 | 2.30 | 2.57 | 3.05 | 2.44 | 1.80 | 2.04 | 1.48 | 1.98 | 1.19 | |

| Gradient | |
|----------|------|
| Maximum | 6.72 |
| Minimum | 0.56 |
| Average | 2.06 |

APPENDIX D
SITE INSPECTIONS



Site Inspection Form

Site Name: Buffalo Color Area DWeather: 23 FProject Number: 30074Assessment by: Scott SaylesDate: 02/15/10

| Yes | No | N/A |
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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

A. Security

1. Does fence exist? _____
2. Is there a breach in fence? _____
3. Locks on gate? _____
4. Posted signs? _____
5. Signs of trespassers/vandalism? _____
6. Other _____

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B. General Site Conditions

1. Vegetation stress? _____
2. Mowing required? _____
3. Access road drivable? _____
4. Odors? _____
5. Other _____

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C. Cap Inspection

1. Exposed waste? _____
2. Side slope stable? _____
3. Erosion? _____
4. Leachate seeps (discolored vegetation)? _____
5. Synthetic liner exposed? _____
6. Bare spots? _____
7. Presence of burrowing animals? _____
8. Deep rooted vegetation? _____
9. Cracking? _____
10. Ponding water? _____
11. Evidence of methane seeps? _____
12. Other _____

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D. Surface Water

1. Obstruction of flow ditches? _____
2. Erosion of ditches? _____
3. Silt & erosion control? _____
4. Culverts in good condition? _____
5. Evidence of overflow or uncontrolled flow? _____
6. Outfalls in good condition? _____
7. Sedimentation basin/ponds secure? _____
8. Other _____

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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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E. Methane Gas Control

1. Does one exist? _____



Site Inspection Form

Yes No N/A

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| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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2. Is system active or passive? _____
3. Permanent methane gas probes? _____
4. Locks on monitoring wells? _____
5. Vents in working order? _____
6. Well seals in place? _____
7. Methane levels within LEL limits? _____
8. Monitoring reports current? _____
9. Other _____

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F. Leachate Collection System

1. Does one exist? _____
2. Collection method:
 - a. Sump? _____
 - b. Well point? 4 extraction wells
 - c. Earthen basin/pond? _____
 - d. Structure secured? _____
 - e. Other _____
3. Pumping system:
 - a. Automatic? _____
 - b. Manual? can be operated manually
 - c. Mechanically operable? _____
 - d. Leaks/failures? EW-2 pump appears to be above the water level.
4. Disposals:
 - a. Onsite pretreatment/treatment? Water is treated in Plant (Area A).
 - b. Surface discharge? (NPDES/SPDES) _____
 - c. POTW – hardpiped? _____
 - d. Quick disconnect caps in place? _____
5. Transportation (if any):
 - a. Chemicals? _____
 - b. Filter cake? _____
6. Ancillary equipment in good condition? (Pipes, valves, pumps, vaults, instruments and etc.) _____
7. Monitoring reports current? _____
8. Other _____

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G. Groundwater Monitoring & Recovery Wells (if any)

1. Locks on wells? _____
2. Wells in good condition? _____
3. Well seals in good condition? _____
4. Access to wells? _____
5. Monitoring reports current? _____
6. Other _____



Site Inspection Form

| Yes | No | N/A |
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H. Treatment Plant

1. Building in good condition? (Doors, windows, wells, roof) _____
2. Visual tank inspection performed? _____
3. Visual inspection of pipes, valves, fittings etc.? _____
4. Pump operation/inspection performed? _____
5. Instruments operation/calibration? _____
6. Mixer operation/inspection? _____
7. Proper personal protection equipment? _____
8. Air compressor system functioning properly? _____
9. Filter press inspected? _____
10. Emergency generator functioning properly? _____

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I. Polymeric Marine Mattress (PMM)

1. Damage due to burrowing animals? _____
2. Damage due ice and/or ice flowages? _____
3. Impacts or damage due to the periodic dredging of the Buffalo River? _____
4. Impacts or damage due to navigation activities in the Buffalo River? _____
5. Establishment of woody plant growth causing displacement or stress on the system? _____
6. Areas of settlement or displacement of the system? _____
7. Erosion at the upstream and downstream limits of the system? _____
8. Damage to the stone infill adjacent to Outfall #006 and the concrete wall/sheet pile along the upstream limit of the system? _____
9. Damage to the stone infill within the marine mattresses? _____
10. Damage to the general integrity of the system (Look for splits, cuts and gaps)? _____

J. General Comments

All areas covered with snow with no visible vegetation. NYDEC could not attend. I spoke with Gene Melnyk, NYDEC, on 03/12/2010.

Scott Ayler 2/15/10



Site Inspection Form

Site Name: Buffalo Color Area DWeather: 50 F and SunnyProject Number: 30074Assessment by: Scott SaylesDate: 04/22/2010

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A. Security

1. Does fence exist? _____

2. Is there a breach in fence? _____

3. Locks on gate? _____

4. Posted signs? _____

5. Signs of trespassers/vandalism? _____

6. Other _____

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B. General Site Conditions

1. Vegetation stress? _____

2. Mowing required? _____

3. Access road drivable? _____

4. Odors? _____

5. Other _____

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| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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C. Cap Inspection

1. Exposed waste? _____

2. Side slope stable? _____

3. Erosion? _____

4. Leachate seeps (discolored vegetation)? _____

5. Synthetic liner exposed? _____

6. Bare spots? _____

7. Presence of burrowing animals? _____

8. Deep rooted vegetation? _____

9. Cracking? _____

10. Ponding water? _____

11. Evidence of methane seeps? _____

12. Other _____

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| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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D. Surface Water

1. Obstruction of flow ditches? _____

2. Erosion of ditches? _____

3. Silt & erosion control? _____

4. Culverts in good condition? _____

5. Evidence of overflow or uncontrolled flow? _____

6. Outfalls in good condition? _____

7. Sedimentation basin/ponds secure? _____

8. Other _____

| | | |
|-------------------------------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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E. Methane Gas Control

1. Does one exist? _____



Site Inspection Form

| Yes | No | N/A |
|-------------------------------------|-------------------------------------|-------------------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

2. Is system active or passive? _____
3. Permanent methane gas probes? _____
4. Locks on monitoring wells? _____
5. Vents in working order? _____
6. Well seals in place? _____
7. Methane levels within LEL limits? _____
8. Monitoring reports current? _____
9. Other _____

F. Leachate Collection System

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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

1. Does one exist? _____
2. Collection method:
 - a. Sump? _____
 - b. Well point? 4 extraction wells
 - c. Earthen basin/pond? _____
 - d. Structure secured? _____
 - e. Other _____

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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

3. Pumping system:
 - a. Automatic? _____
 - b. Manual? _____
 - c. Mechanically operable? _____
 - d. Leaks/failures? _____

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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

4. Disposals:
 - a. Onsite pretreatment/treatment? Water is treated in Plant (Area A).
 - b. Surface discharge? (NPDES/SPDES) _____
 - c. POTW – hardpiped? _____
 - d. Quick disconnect caps in place? _____

| | | |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

5. Transportation (if any):
 - a. Chemicals? _____
 - b. Filter cake? _____
6. Ancillary equipment in good condition? (Pipes, valves, pumps, vaults, instruments and etc.) _____
7. Monitoring reports current? _____
8. Other _____

| | | |
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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

G. Groundwater Monitoring & Recovery Wells (if any)

1. Locks on wells? _____
2. Wells in good condition? _____
3. Well seals in good condition? _____
4. Access to wells? _____
5. Monitoring reports current? _____
6. Other _____

Site Inspection Form

Yes No N/A

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|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

H. Treatment Plant

1. Building in good condition? (Doors, windows, wells, roof) _____
2. Visual tank inspection performed? _____
3. Visual inspection of pipes, valves, fittings etc.? _____
4. Pump operation/inspection performed? _____
5. Instruments operation/calibration? _____
6. Mixer operation/inspection? _____
7. Proper personal protection equipment? _____
8. Air compressor system functioning properly? _____
9. Filter press inspected? _____
10. Emergency generator functioning properly? _____

| | | |
|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

I. Polymeric Marine Mattress (PMM)

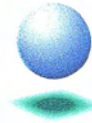
1. Damage due to burrowing animals? _____
2. Damage due ice and/or ice flowages? _____
3. Impacts or damage due to the periodic dredging of the Buffalo River? _____
4. Impacts or damage due to navigation activities in the Buffalo River? _____
5. Establishment of woody plant growth causing displacement or stress on the system? _____
6. Areas of settlement or displacement of the system? _____
7. Erosion at the upstream and downstream limits of the system? _____
8. Damage to the stone infill adjacent to Outfall #006 and the concrete wall/sheet pile along the upstream limit of the system? _____
9. Damage to the stone infill within the marine mattresses? _____
10. Damage to the general integrity of the system (Look for splits, cuts and gaps)? _____

J. General Comments

Gary Melnyk & Dave Szymanski, NYSDEC, attended inspection. Fencing may be needed along railroad embankment to prevent trespass.



Date: 04/22/2010



Site Inspection Form

Site Name: Buffalo Color Area DWeather: Sunny 80 degreesProject Number: 30074Assessment by: Scott SaylesDate: 8/16/10

| Yes | No | N/A |
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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

A. Security

1. Does fence exist? _____
2. Is there a breach in fence? _____
3. Locks on gate? _____
4. Posted signs? _____
5. Signs of trespassers/vandalism? _____
6. Other _____

| | | |
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| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

B. General Site Conditions

1. Vegetation stress? _____
2. Mowing required? _____
3. Access road drivable? _____
4. Odors? _____
5. Other _____

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| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

C. Cap Inspection

1. Exposed waste? _____
2. Side slope stable? _____
3. Erosion? _____
4. Leachate seeps (discolored vegetation)? _____
5. Synthetic liner exposed? _____
6. Bare spots? _____
7. Presence of burrowing animals? _____
8. Deep rooted vegetation? _____
9. Cracking? _____
10. Ponding water? _____
11. Evidence of methane seeps? _____
12. Other _____

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| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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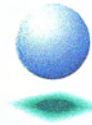
D. Surface Water

1. Obstruction of flow ditches? _____
2. Erosion of ditches? _____
3. Silt & erosion control? _____
4. Culverts in good condition? _____
5. Evidence of overflow or uncontrolled flow? _____
6. Outfalls in good condition? _____
7. Sedimentation basin/ponds secure? _____
8. Other _____

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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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E. Methane Gas Control

1. Does one exist? _____



Site Inspection Form

| Yes | No | N/A |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

2. Is system active or passive? passive
3. Permanent methane gas probes? _____
4. Locks on monitoring wells? _____
5. Vents in working order? _____
6. Well seals in place? _____
7. Methane levels within LEL limits? _____
8. Monitoring reports current? _____
9. Other _____

F. Leachate Collection System

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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

1. Does one exist? _____
2. Collection method:
 - a. Sump? _____
 - b. Well point? 4 extraction wells
 - c. Earthen basin/pond? _____
 - d. Structure secured? _____
 - e. Other _____
3. Pumping system:
 - a. Automatic? _____
 - b. Manual? _____
 - c. Mechanically operable? _____
 - d. Leaks/failures? _____
4. Disposals:
 - a. Onsite pretreatment/treatment? Water is treated in Plant (Area A).
 - b. Surface discharge? (NPDES/SPDES) _____
 - c. POTW – hardpiped? _____
 - d. Quick disconnect caps in place? _____
5. Transportation (if any):
 - a. Chemicals? _____
 - b. Filter cake? _____
6. Ancillary equipment in good condition? (Pipes, valves, pumps, vaults, instruments and etc.) _____
7. Monitoring reports current? _____
8. Other _____

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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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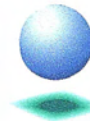
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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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G. Groundwater Monitoring & Recovery Wells (if any)

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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

1. Locks on wells? _____
2. Wells in good condition? _____
3. Well seals in good condition? _____
4. Access to wells? _____
5. Monitoring reports current? _____
6. Other _____



Site Inspection Form

| Yes | No | N/A |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

H. Treatment Plant

1. Building in good condition? (Doors, windows, wells, roof) _____
2. Visual tank inspection performed? _____
3. Visual inspection of pipes, valves, fittings etc.? _____
4. Pump operation/inspection performed? _____
5. Instruments operation/calibration? _____
6. Mixer operation/inspection? _____
7. Proper personal protection equipment? _____
8. Air compressor system functioning properly? _____
9. Filter press inspected? _____
10. Emergency generator functioning properly? _____

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| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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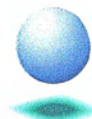
I. Polymeric Marine Mattress (PMM)

1. Damage due to burrowing animals? _____
2. Damage due ice and/or ice flowages? _____
3. Impacts or damage due to the periodic dredging of the Buffalo River? _____
4. Impacts or damage due to navigation activities in the Buffalo River? _____
5. Establishment of woody plant growth causing displacement or stress on the system? _____
6. Areas of settlement or displacement of the system? _____
7. Erosion at the upstream and downstream limits of the system? _____
8. Damage to the stone infill adjacent to Outfall #006 and the concrete wall/sheet pile along the upstream limit of the system? _____
9. Damage to the stone infill within the marine mattresses? _____
10. Damage to the general integrity of the system (Look for splits, cuts and gaps)? _____

J. General Comments

EW-2, the water level is below the pump, so there is no extraction.

Scott Taylor 8/16/10



Site Inspection Form

Site Name: Buffalo Color Area DWeather: Sunny 52 degreesProject Number: 30074Assessment by: Scott SaylesDate: 10/27/10

| Yes | No | N/A |
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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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A. Security

1. Does fence exist? _____
2. Is there a breach in fence? _____
3. Locks on gate? _____
4. Posted signs? _____
5. Signs of trespassers/vandalism? _____
6. Other _____

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| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

B. General Site Conditions

1. Vegetation stress? _____
2. Mowing required? _____
3. Access road drivable? _____
4. Odors? _____
5. Other _____

| | | |
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| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

C. Cap Inspection

1. Exposed waste? _____
2. Side slope stable? _____
3. Erosion? _____
4. Leachate seeps (discolored vegetation)? _____
5. Synthetic liner exposed? _____
6. Bare spots? _____
7. Presence of burrowing animals? _____
8. Deep rooted vegetation? _____
9. Cracking? _____
10. Ponding water? _____
11. Evidence of methane seeps? _____
12. Other _____

| | | |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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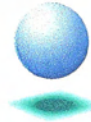
D. Surface Water

1. Obstruction of flow ditches? _____
2. Erosion of ditches? _____
3. Silt & erosion control? _____
4. Culverts in good condition? _____
5. Evidence of overflow or uncontrolled flow? _____
6. Outfalls in good condition? _____
7. Sedimentation basin/ponds secure? _____
8. Other _____

| | | |
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| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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E. Methane Gas Control

1. Does one exist? _____



Site Inspection Form

| Yes | No | N/A |
|-------------------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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- Is system active or passive? passive
- Permanent methane gas probes? _____
- Locks on monitoring wells? _____
- Vents in working order? _____
- Well seals in place? _____
- Methane levels within LEL limits? _____
- Monitoring reports current? _____
- Other _____

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F. Leachate Collection System

- Does one exist? _____
- Collection method:
 - Sump? _____
 - Well point? 4 extraction wells
 - Earthen basin/pond? _____
 - Structure secured? _____
 - Other _____
- Pumping system:
 - Automatic? _____
 - Manual? _____
 - Mechanically operable? _____
 - Leaks/failures? _____
- Disposals:
 - Onsite pretreatment/treatment? Water is treated in Plant (Area A).
 - Surface discharge? (NPDES/SPDES) _____
 - POTW – hardpiped? _____
 - Quick disconnect caps in place? _____
- Transportation (if any):
 - Chemicals? _____
 - Filter cake? _____
- Ancillary equipment in good condition? (Pipes, valves, pumps, vaults, instruments and etc.) _____
- Monitoring reports current? _____
- Other _____

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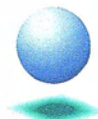
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G. Groundwater Monitoring & Recovery Wells (if any)

- Locks on wells? _____
- Wells in good condition? _____
- Well seals in good condition? _____
- Access to wells? _____
- Monitoring reports current? _____
- Other _____



Site Inspection Form

Yes No N/A

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H. Treatment Plant

1. Building in good condition? (Doors, windows, wells, roof) _____
2. Visual tank inspection performed? _____
3. Visual inspection of pipes, valves, fittings etc.? _____
4. Pump operation/inspection performed? _____
5. Instruments operation/calibration? _____
6. Mixer operation/inspection? _____
7. Proper personal protection equipment? _____
8. Air compressor system functioning properly? _____
9. Filter press inspected? _____
10. Emergency generator functioning properly? _____

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I. Polymeric Marine Mattress (PMM)

1. Damage due to burrowing animals? _____
2. Damage due ice and/or ice flowages? _____
3. Impacts or damage due to the periodic dredging of the Buffalo River? _____
4. Impacts or damage due to navigation activities in the Buffalo River? _____
5. Establishment of woody plant growth causing displacement or stress on the system? _____
6. Areas of settlement or displacement of the system? _____
7. Erosion at the upstream and downstream limits of the system? _____
8. Damage to the stone infill adjacent to Outfall #006 and the concrete wall/sheet pile along the upstream limit of the system? _____
9. Damage to the stone infill within the marine mattresses? _____
10. Damage to the general integrity of the system (Look for splits, cuts and gaps)? _____

J. General Comments

Eugene Melnyk from the DEC on site. Animal burrow at EW-2.

Scott Hayles 10/27/10