September 12, 2016

Mr. David Szymanski
New York State Department of Environmental Conservation
270 Michigan Ave
Buffalo, NY 14203-2915

Subject: 2015 Periodic Review Report
Former Buffalo Color Corporation – Area D Site No. 915012
OSC Job No. 16011

Dear Mr. Szymanski:

On behalf of South Buffalo Development Corporation, LLC (SBD), Ontario Specialty Contracting, Inc. (OSC) is submitting this Periodic Review Report (PRR) for the Buffalo Color Area D Site (referred to hereafter as the "Site"). This PRR acts to chronicle and assess all post remedial activities conducted during the 2015 year (referred to hereafter as the "reporting period").

The completed Site Management Periodic Review Report (PRR) Notice - Institutional and Engineering controls Certification Form is provided herein as **Attachment A**. The following paragraphs provide the information specified in the original 45-day PRR notice letter issued by New York State Department of Environmental Conservation's (NYSDEC's) Albany, NY office.

I. Executive Summary

A. Site Summary: The 18.92 acre Site is located at 2 Buffalo Creek Railroad in the City of Buffalo, County of Erie, New York. The Site is part of five areas that comprised the former Buffalo Color Corporation, which produced dyes and organic chemicals until its bankruptcy in 2005. The Site was remediated in accordance with a June 28, 1993 order on consent; index B9-0014-84-01RD, between the NYSDEC and AlliedSignal Incorporated.

Remedial investigations determined that Site soil contained concentrations of organic and inorganic substances that exceeded the NY Commercial and Industrial Soil Cleanup Objectives (SCOs). Shallow groundwater was found to contain concentrations of organic and inorganic substances that exceeded the NY Class GA standards.

The following is a summary of the remedial actions performed at the Site:

- 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**);
- Installation and operation of a groundwater extraction system (D-EW-1 through D-EW-4) to convey extracted groundwater to the treatment system located on Area A.
- Installation of an observation well network to monitoring groundwater elevation and verify that an inward gradient is maintained across the hydraulic barrier. These wells are referred to with the "OW" prefix on **Figure 1**.
- Execution and recording of an environmental easement to restrict land use and address future exposure to any remaining contamination at the Site; and

- Development and implementation of a Site Management Plan for long term management of remaining contamination.
- Maintenance and bathymetric survey of the Sediment Deposit Area

During the reporting period, the following routine Operations, Maintenance, and Monitoring (OMM) activities were completed in accordance with the Site Management Plan (SMP) prepared by Mactec Engineering and Consulting P.C. dated April 20, 2015 (SMP):

- Annual shallow groundwater sampling via a composite extraction well sample collected from the force main within the Area A groundwater treatment facility (GWTF);
- Quarterly Site inspections;
- Annual brush hog mowing of the cap performed following the second week of September;
- Quarterly groundwater extraction system performance monitoring; and
- Quarterly observation well monitoring.
- Bathymetric survey

B. Effectiveness of the Remedial Program: The following conclusions were developed based on data collected during the reporting period:

- The cap system is intact with suitable vegetative cover.
- A consistent inward gradient has been maintained across the hydraulic barrier; based upon the comparison of observation well measurements collected outside of the hydraulic barrier (near the Buffalo River) and those collected from neighboring interior observation wells.
- Site inspection reports indicate that the effectiveness of the knotweed (invasive plant species) barrier fabric installed within the southwestern corner of the Site will need to be assessed during the summer months of the following reporting period.

C. Compliance: No areas of non-compliance have been identified.

D. Recommendations: No changes to the SMP are currently warranted or recommended. Routine OMM activities will continue during the subsequent reporting period.

II. Site Overview

A. Site Location: The 18.92 acre Site is located at 2 Buffalo Creek Railroad in the City of Buffalo, County of Erie, New York. The Site is bounded by the Buffalo River to the east, south, and southwest; a railroad yard to the north; and an abandoned railroad right-of-way to the northeast (**Figure 1**). The surrounding area consists of industrial and residential properties.

Originally founded as the Schoellkopf Aniline and Dye Company in 1879, the plant produced dyes and organic chemicals based primarily on aniline and various aniline derivatives. The company was reorganized into the National Aniline Chemical Company in 1916. It became one of the five companies that merged to create Allied Chemical Corporation (Allied Chemical) in 1920. The existing dye-making facility and the right to produce certain dyes and intermediates were sold by Allied Chemical to Buffalo Color Corporation on July 1, 1977. At the time of the sale, the plant was divided into eight areas designated with the letters A, B, C, D, E, F, G, and H. Buffalo Color Corporation purchased the manufacturing areas A through E, while Allied Chemical retained an acid plant (which was subsequently sold to PVS Chemicals in 1981), the research and development facility on Area F, and the parking lots on Areas G (Elk Street) and H (Smith Street).

Environmental investigation of the Area D Site began in the 1980s. In accordance with the Order on Consent, Area D finalization of the remedial investigation occurred from 1993 through 1996 and

remediation occurred from 1996 through 1998. OMM activities have been conducted in accordance with a NYSDEC approved, post-remedial construction, OMM Plan for Area D (Parsons, 2001) since the completion of remediation.

In 2005, Buffalo Color Corporation filed for bankruptcy and ceased manufacturing activity. During the bankruptcy proceedings, some of the facility's production equipment was sold and removed from the Site. In conjunction with the bankruptcy, the office building and former plant hospital located at 100 Lee Street on Area B and the warehouse building (Building 322) located near Elk Street on Area E, along with some of the land under and around those buildings, were sold to other parties. Agreements are in place to preserve access rights to the land for the purposes of any required environmental investigation and remediation activities. The remaining buildings and property on Areas A, B, C, D and E were purchased by SBD in 2008.

B. Chronology: Numerous environmental investigations have been completed for the Buffalo Color property, including Area D, dating back to the 1980s. In accordance with the order on consent, finalization of the Area D remedial investigation occurred from 1993 through 1996 and remediation occurred from 1996 through 2000. 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.

The primary remedial objectives at the Areas A&B Site were to eliminate the potential for direct contact with impacted soils and for impacted groundwater to discharge off-Site. The key remedial actions performed for the Site are summarized below:

- Installation of a soil-bentonite slurry wall (vertical hydraulic barrier) around the Site perimeter to restrict migration of impacted shallow groundwater to the Buffalo River;
- Plugging of all pipes encountered during the remedial action using concrete;
- Installation of a Resource Conservation and Recovery Act (RCRA) compliant cap system over the entire Site to prevent soil contact and precipitation infiltration. The cap system included a flexible membrane liner, geonet drainage layer, two feet of cover soil, and 6 inches of topsoil to establish a vegetative cover;
- Excavation and dredging of soil/sediment along the Area D shoreline and placement of the removed soil/sediment within the footprint of the cap system;
- Placement of riprap along the Area D shoreline to prevent erosion of soil and sediment and migration of eroded soil and sediment to the Buffalo River;
- Placement of geotextile and riprap over the Sediment Deposit Area (SDA), an area along the western shoreline where a historic slope failure had occurred;
- Installation of a groundwater extraction system (GWES) and treatment facility to address hydraulic control of impacted Site groundwater, behind the Site vertical hydraulic barrier; and
- Preparation of a Site OMM Plan to provide direction towards managing the long-term remedy.

Additional remedial actions were performed to complete the Site remedy and allow closure of the Order on Consent. The following actions were approved by NYSDEC and implemented between 2014 and 2015.

- An initial bathometric survey was conducted on April 29, 2015. Additional surveys will occur every 5 years to ensure that the riprap containment structure is in place and effectively preventing potentially impacted sediment migration;
- Execution and recording of an environmental easement in favor of NYSDEC to restrict land use and address future exposure to any remaining contamination at the Site. Elements of the environmental easement include establishing engineering and institutional controls, prohibiting groundwater use,

providing protocols for disturbance of Site soils and/or groundwater, and limiting future land use to commercial or industrial use; and

- Development and implementation of a Site Management Plan for long term management of the site remedy as required by the environmental easement, which includes plans for institutional and engineering controls, performance monitoring, operation and maintenance, and reporting.

III. Evaluation of Remedy Performance, Effectiveness and Protectiveness

The performance, effectiveness and protectiveness of the remedy are verified through evaluating each of the primary remedial measures.

Exposure Potential: The potential for direct exposure to impacted soils and/or groundwater is mitigated by ensuring the cap system is intact as constructed and the recorded environmental easement is adhered to. The following bulleted items summarize the objective performance evaluation of Site remedial measures towards preventing exposure to remaining contamination.

- The Site-wide inspection reports indicate that compliance to the Site institutional controls, established by the environmental easement, has been upheld.
- Site cover system inspection reports indicate the soil cover and cap system are intact and maintain suitable vegetation.
- Inspection sheets for the reporting period are provided as **Attachment B**.

Off-Site Migration: Off-Site migration of impacted groundwater is mitigated by maintaining an inward hydraulic gradient between the observation wells "outside" of the VHB (i.e., closest to the Buffalo River; also referred to as exterior wells) and the observation wells "inside" the hydraulic barrier (interior wells). The risk of impacted soil migration due to slope failure along the Area D Buffalo River shoreline is mitigated through the monitoring and maintenance of riverbank vegetated slopes and structures. Additionally, the lack of potentially impacted sediment migration from the SDA is verified through bathometric survey monitoring; performed every five years. The following bulleted items summarize the objective performance evaluation of Site remedial measures towards the mitigation of off-Site contaminant migration.

- A consistent inward gradient has been maintained across the hydraulic barrier; based upon the comparison of observation well measurements collected outside of the hydraulic barrier (near the Buffalo River) and those collected from neighboring interior observation wells.
- Site cover system inspection reports indicate the Site soil cover system is intact and maintains suitable vegetation.
- A baseline bathometric survey for the SDA monitoring program was completed on April 29, 2015 and is provided in **Attachment H**.

Natural Attenuation: Annual groundwater monitoring data has been collected within the reporting period and after review of the data, an apparent trend, either decreasing or increasing, has not been identified for the Area D Site. Tabulated analytical results for the annual Area D GWES composite sample are provided as **Attachment D.** Groundwater monitoring data will continue to be obtained and evaluated in the subsequent reporting period.

IV. IC/EC Plan Compliance Report

A. IC/EC Requirements and Compliance: A series of institutional controls (IC) have been developed and are adhered to by the established Site environmental easement. These ICs are designed to:

- Implement, maintain and monitor engineering control systems;
- Address future exposure to remaining contamination by controlling disturbances of the subsurface contamination through adherence to an approved excavation work plan;
- Prohibit Site groundwater use; and
- Limit the use and development of the Site to commercial and industrial uses only.

Engineering controls (ECs) developed for the Site consist of:

- Recorded protocols for the disturbance of Site soils and/or groundwater, and addressing potential vapor intrusion (VI) pathways of occupied structures associated with future development at the Site;
- An integrated Site-wide cover system consisting of flexible membrane liner, geocomposite drainage layer, clean soil with a minimum thickness of 24 inches, and topsoil to support vegetation (seeded with native grasses);
- Riverbank slope stability fortifications consisting of riprap toe buttress and geotextile overlain by clean soil cover and riparian vegetation to prevent erosion and migration of potentially impacted soil to the Buffalo River;
- A geotextile and riprap protective cover placed over the SDA;
- A perimeter storm water drainage system, including a series of shallow vegetated ditches, underlain with perforated drain pipe and intermittent discharge points to the Buffalo River;
- A VHB installed around the perimeter of the Site to prevent migration of contaminated groundwater to the Buffalo River; and
- A GWES to provide the required hydraulic control (as necessary) from within the VHB perimeter.

Performance of Site IC/ECs is evaluated through the following tasks:

- Documented Site-wide, cover system, and riverbank inspections to ensure the environmental easement is active and in force, the cover system is intact and protective to potential human exposure, and shoreline structures are intact and stable;
- Bathometric survey measurements collected for the SDA, to ensure its internment and stability; and
- Hydraulic control behind the VHB is verified through the collection of groundwater elevation measurements from the observation well network, to confirm the presence of an inward hydraulic gradient.

The Site IC/ECs are all currently active and in force. At this time, no deficiencies have been identified with the established Site IC/ECs and no recommendations for changes are proposed.

B. IC/EC Certification: The IC/EC certifications are provided in **Attachment A**.

V. Monitoring Plan Compliance Report

A. Components of the Monitoring Plan: Routine Site monitoring activities include:

- Annual shallow groundwater sampling at the GWES;
- Quarterly groundwater elevation measurements of the VHB observation well network;
- Quarterly Site-wide, cover system and riverbank inspections; and
- SDA bathometric survey monitoring conducted every five years.

B. Summary of Monitoring Completed During Reporting Period: The following tables summarize the routine Site monitoring activities that have been completed in accordance with the SMP during the reporting period:

AREA D 2015 MONITORING EVENT COMPLIANCE SUMMARY		QUARTER			
Monitoring Type	Frequency	1st	2nd	3rd	4th
Groundwater Sampling	Annual		X		
VHB Observation Wells Groundwater Elevation Measurements	Quarterly	X	X	X	X
Site-Wide, Cover System & Riverbank Monitoring	Quarterly	X	X	X	X

Complete (X), Partial (P), Omitted (-)

AREA D SDA BATHYMETRIC SURVEY MONITORING COMPLIANCE SUMMARY	YEAR
Baseline Survey	2015

C. Comparisons with Remedial Objectives: Natural attenuation of Site groundwater is tracked through the sampling of Site extraction wells. New York State Water Quality Standards for Surface Water and Groundwater (Table 1, cf. section 703.5 - Class GA) are the established groundwater quality objectives for the Site. TestAmerica Laboratories, Inc. in Amherst, NY performed the laboratory analysis for the collected groundwater samples and Mactec conducted a level 2 data validation of the corresponding data. Tabulated groundwater analytical data is provided in **Attachment D**.

D. Monitoring Deficiencies: No monitoring deficiencies were noted.

E. Conclusions and Recommendations for Changes: No changes are recommended at this time and routine monitoring will continue during the following reporting period.

VI. Operations and Maintenance Plan Compliance Report

A. Components of the O&M Plan: The operations and maintenance requirements for the GWES are provided in the GWES operation, maintenance and monitoring (OM&M) plan. Information on non-mechanical engineering controls (i.e., soil cover system) is provided in section IV - IC/EC Plan Compliance Report.

- Monthly (Quarterly Minimum) Groundwater Extraction System Monitoring: During this activity, the O&M contractor inspects the conditions of the extraction and observation wells; records groundwater level measurements at each observation well; and records flow totalizer readings from each extraction well. This information is summarized in the observation well hydrographs **Attachment C**.
- Monthly (Quarterly Minimum) GWES Treatment Plant Monitoring: Groundwater from the Area D extraction system is conveyed to the treatment plant located on Area A. The combined groundwater from Area A and Area D is treated and discharged to the BSA. Discharge samples are collected quarterly and the data is submitted within a discharge monitoring report (DMR) to the BSA on a quarterly basis, as specified in the BSA discharge permit, with a copy provided to the NYSDEC. DMR copies, submitted within the reporting period, are provided as **Attachment E**.

B. Summary of O&M Completed: In addition to the GWES and treatment plant system monitoring activities, various repair and maintenance initiatives are routinely completed on the mechanical, electrical, and plumbing systems; in order to maintain performance of the GWES. Items requiring repair and maintenance include, but are not limited to, transfer pumps, submersible pumps, well casings/screens, holding tanks, pressure vessels, conveyance plumbing, filter media, activated carbon, backup generator, control/communication electrical, power supply electrical, building envelope, and

personnel hygienic facilities. Annual mowing of the meadow area is completed in the third quarter and invasive knotweed is evaluated monthly.

C. Evaluation of Remedial Systems: The Area D remedial system is effectively achieving the objectives of the remedial action.

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

E. Conclusions and Recommendations: No changes are recommended at this time.

VII. Overall PRR Conclusions and Recommendations

A. Compliance with SMP: Activities completed during the reporting period complied with the requirements of the SMP.

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 September 2017.

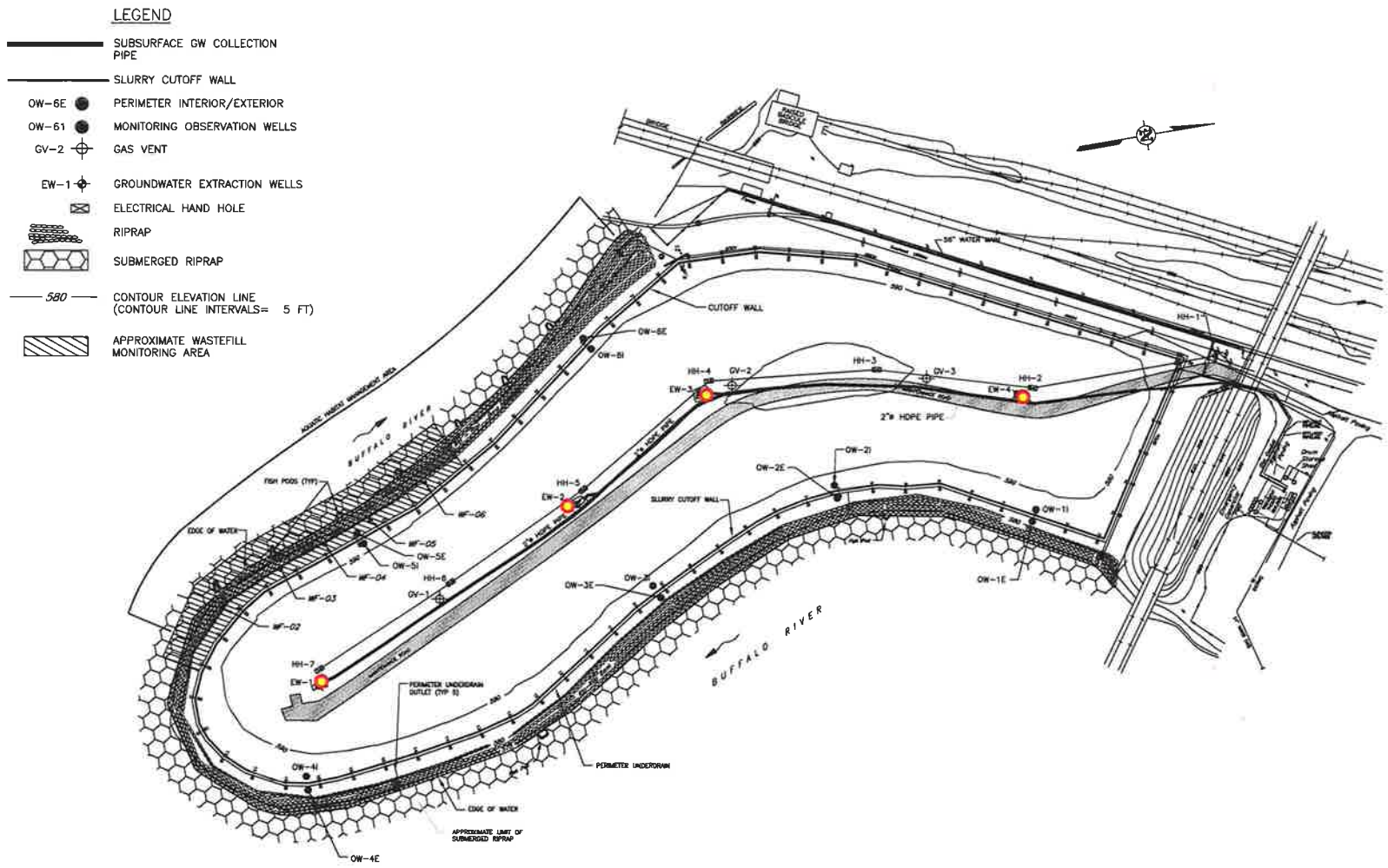
Please review the attached information and feel free to contact me if you have any questions.

Sincerely,

Kirsten Colligan
Project & Environmental Monitor - *Ontario Specialty Contracting, Inc.*

cc:	Eugene Melnyk	NYSDEC Region 9
	Richard Galloway	Honeywell International Inc.
	Daniel Forlastro	Mactec Engineering and Consulting, P.C.
	John Yensan	South Buffalo Development, LLC
	Jon Williams	South Buffalo Development, LLC

FIGURES



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	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

ATTACHMENT A

PRR NOTICE
IC/EC CONTROLS CERTIFICATION FORM

Enclosure 2
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: 2 Buffalo Creek Railroad Zip Code: 14220
City/Town: Buffalo
County: Erie
Site Acreage: 19.0

Reporting Period: October 05, 2015 to October 05, 2016

		YES	NO
1.	Is the information above correct?	☒	☐
	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?	☐	☒
3.	Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	☐	☒
4.	Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	☐	☒
	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?	☐	☒

Box 2

		YES	NO
6.	Is the current site use consistent with the use(s) listed below? Commercial and Industrial	☒	☐
7.	Are all ICs/ECs in place and functioning as designed?	☒	☐

IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

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

Signature of Owner, Remedial Party or Designated Representative

9/14/16
Date

SITE NO. 915012 **Box 3**

Description of Institutional Controls

Parcel	Owner	Institutional Control
122.160-1-10	South Buffalo Development, LLC	Ground Water Use Restriction Soil Management Plan Landuse Restriction Monitoring Plan Site Management Plan O&M Plan IC/EC Plan

Institutional Controls

An Environmental Easement was imposed for the controlled property which:

- requires the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- restricts the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County; and
- requires compliance with the Department approved Site Management Plan.

Site Management Plan

A Site Management Plan has been prepared for the site, which includes the following:

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

Institutional Controls:

This plan includes, but may not be limited to:

o an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
o descriptions of the provisions of the environmental easement including any land use, and groundwater use restrictions;
o provisions for the management and inspection of the identified engineering controls;
o maintaining site access controls and Department notification; and
o execute necessary activities for the periodic reviews and certification of the institutional and/or engineering controls.

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

o monitoring of groundwater and riverfill cover area to assess the performance and effectiveness of the remedy; and
o a schedule of monitoring and frequency of submittals to the Department.

3. an Operation and Maintenance (O&M) Plan to ensure continued operation, maintenance, optimization, monitoring, inspection, and reporting of any mechanical or physical components of the remedy. The plan includes, but is not limited to:

o procedures for operating and maintaining the remedy;
o compliance monitoring of treatment systems to ensure proper O&M as well as providing the data for any necessary permit or permit equivalent reporting;
o maintaining site access controls and Department notification; and
o providing the Department access to the site and O&M records.

Box 4

Description of Engineering Controls

Parcel	Engineering Control
122.160-1-10	Groundwater Treatment System Cover System Groundwater Containment Fencing/Access Control

Engineering Controls at the site includes:

- A soil-bentonite slurry vertical hydraulic barrier wall surrounding Area "D" to contain contaminated groundwater;
- A multilayered soil/synthetic membrane cap on a graded base over the entire site within the limits of the slurry wall;

Parcel	Engineering Control
	- A contaminated groundwater extraction and treatment system with permitted discharge of treated groundwater to the Buffalo Sewer Authority sanitary sewer; - Riverbank stabilization using riprap with habitat enhancements; - An in-river cover system to isolate and contain grossly contaminated material outside the containment limits of the barrier wall within a limited stretch of riverbank; - security fencing; and - a monitoring well network.

Box 5

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

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. Otherwise continue.

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

Signature of Owner, Remedial Party or Designated Representative

9/14/16
Date

IC CERTIFICATIONS
SITE NO. 915012

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1,2, and 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.

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

am certifying as Owner (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

Signature of Owner, Remedial Party, or Designated Representative Rendering Certification

9/14/16
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.

I DANIEL FORLASTRO (print name) at AMEC FOSTER WHEELER 800 N. BELL AVE SUITE 200, CARNEGIE PA 15106 (print business address).

am certifying as a Professional Engineer for the SOUTH BUFFALO DEVELOPMENT LLC (Owner or Remedial Party)

STATE OF NEW YORK * DANIEL FORLASTRO * 091171 LICENSED PROFESSIONAL ENGINEER

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

Stamp (Required for PE)

9/12/16

Date

ATTACHMENT B

SITE INSPECTIONS

Area D Cover System; Riverbank; & Site-Wide Compliance Inspection		Area D Additional Notes	Snow covered site	Knotweed fabric still in place	Knotweed fabric still in place, to be addressed	Knotweed fabric still in place, to be addressed
	Site-Wide Compliance (OK / Comment)	Area D Institutional Site Use Restrictions	OK	OK	OK	OK
		Area D O&M Schedule	OK	OK	OK	OK
		Area D Active Site Permits	BSA- ok	BSA- ok	BSA- ok	BSA- ok
		Area D Site Records	OK	OK	OK	OK
		Area D Groundwater Monitoring Program	OK	OK	OK	OK
		Area D Vertical Hydraulic Barrier Monitoring Program	OK	OK	OK	OK
	Riverbank (OK / Comment)	Sediment Deposit Area (SDA) Bathometric Survey (Performed Every 5 Years)	Baseline bathometric survey scheduled for Spring 2015	Baseline bathometric survey scheduled for Spring 2015	Baseline bathometric survey complete summer 2015	Baseline bathometric survey complete summer 2015
		Area D Shoreline Erosion Protection (Vegetation / Riprap)	OK	OK	OK	OK
		Area D Shoreline Soil Slope Integrity	OK	OK	OK	OK
	Cover System (OK / Comment)	Area D Storm Drainage System & Structures	OK	OK	OK	OK
		Area D Occupied Basement Slabs	None	None	None	None
		Area D Outdoor Paved Areas	None	None	None	None
		Area D Gravel Cover Integrity	OK	OK	OK	OK
		Area D Grass / Vegetation	Snow covered	Ok	Ok	Ok
		Area D Soil Cover Integrity	OK	OK	OK	OK
Pre-Inspection Data	Site Conditions	Standing Snow & Ice (LOW: 1" or less / MID: 1" to 12" / HI: 12" or more)	HI	Low	None	None
		Ground Surface (Dry / Damp / Wet)	Dry	Wet	Dry	Wet
	Weather	Temperature Range (+/- 10 Deg F Range)	20	15 (53)	10	41
		Wind (Calm / Moderate / Strong)	Calm	Calm	Calm	Moderate
		Lightning (Yes / No)	No	No	No	No
		Precipitation (None / Rain / Snow / Hail)	Snow	None	None	Rain
		Cloud Cover (Clear / Pt. Cloudy / Overcast)	Pt. Cloudy	Clear	Clear	Cloudy
		NYSDEC Invitation Extended (Yes / No / List Attendees)	No	No	Dave Szymanski/Gene Melnyk	Dave Szmanski (DEC)
		Associate(s)	Tom Wagner(TW)	Tom Wagner(TW)	Tom Wagner(TW)	Tom Wagner(TW)
		Date	Wed 2/11/2015	Thu 5/14/2015	Tue 9/15/2015	Tue 12/29/2015

ATTACHMENT C

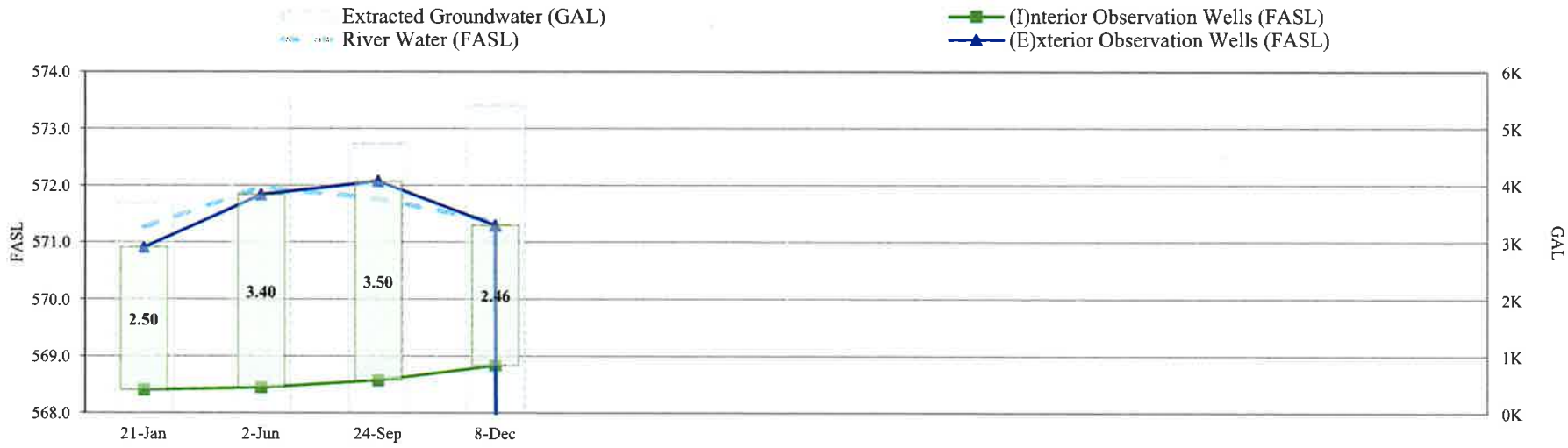
OBSERVATION WELL HYDROGRAPHS

Buffalo Color, Area D - Buffalo River Water Elevations (FASL), Observation Well Groundwater Elevations (FASL), Elevation Differentials (FT) & Extraction Well Network Totals (GAL)

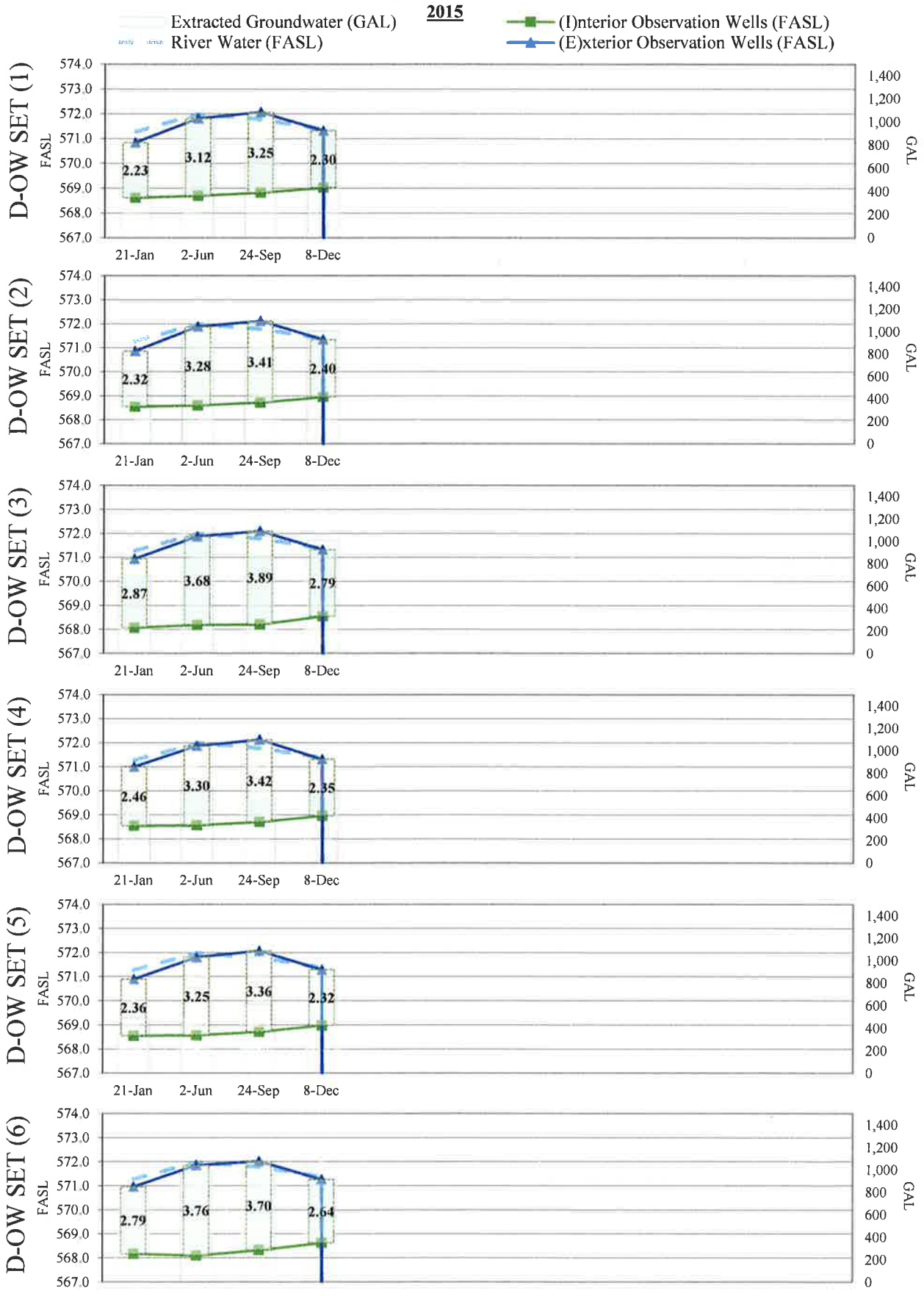
Abbreviations: River Stadia Rod (RSR), Observation Well (OW), Elevation Differential (ED), Extraction Well (EW)

2015	RIVER	D-OW SET (1)			D-OW SET (2)			D-OW SET (3)			D-OW SET (4)			D-OW SET (5)			D-OW SET (6)			AVERAGES			D-EW				
Date	**RSR**	**1I**	**1E**	**1ED**	**2I**	**2E**	**2ED**	**3I**	**3E**	**3ED**	**4I**	**4E**	**4ED**	**5I**	**5E**	**5ED**	**6I**	**6E**	**6ED**	**I**	**E**	**ED**	**1**	**2**	**3**	**4**	**TOTAL**
21-Jan	571.28	568.62	570.84	2.23	568.54	570.86	2.32	568.07	570.94	2.87	568.53	571.00	2.46	568.54	570.90	2.36	568.17	570.96	2.79	568.41	570.91	2.50	540	950	1,341	863	3,694
2-Jun	571.98	568.70	571.81	3.12	568.60	571.88	3.28	568.19	571.87	3.68	568.56	571.87	3.30	568.56	571.81	3.25	568.09	571.85	3.76	568.45	571.85	3.40	760	2,250	668	1,882	5,560
24-Sep	571.78	568.82	572.06	3.25	568.71	572.12	3.41	568.21	572.10	3.89	568.70	572.13	3.42	568.71	572.07	3.36	568.32	572.02	3.70	568.58	572.08	3.50	680	1,120	1,579	1,362	4,741
8-Dec	571.38	569.02	571.31	2.30	568.94	571.34	2.40	568.54	571.33	2.79	568.95	571.31	2.35	568.97	571.29	2.32	568.62	571.26	2.64	568.84	571.30	2.46	750	1,260	1,936	1,463	5,409
Avg | Sum	***571.60***	***568.79***	***571.51***	***2.72***	***568.70***	***571.55***	***2.85***	***568.25***	***571.56***	***3.31***	***568.69***	***571.57***	***2.89***	***568.70***	***571.51***	***2.82***	***568.30***	***571.52***	***3.22***	***568.57***	***571.54***	***2.97***	**2,730**	**5,580**	**5,524**	**5,570**	**19,404**

Buffalo Color, Area D - Buffalo River Water Elevations, Observation Well Groundwater Elevations & Extraction Well Network Totals
Monitoring Period Averages



Buffalo Color, Area D - Buffalo River Water Elevations, Observation Well Groundwater Elevations & Extraction Well Network Allocations



ATTACHMENT D

GROUNDWATER DATA TABLES AND FIGURES

Groundwater Exceedances Summary
Buffalo Color Corporation Area D
Buffalo, New York

		Benzene	Cholorbenzene	1,2-Dichlorobenzene	1,3-Dicholorbenzene	1,4-Dicholorbenzene	Aniline	Phenol
Class GA Standard**		1	5	3	3	3	5	1
Area D Influent Composite	12/22/2011	1400	2500	4.3J	<96	9.8J	5.4J	<48
	12/26/2012	580	3400	6.8J	4.2J	43J	9.1J	<49
	12/13/2013	750	4400	6.9J	4.5J	42	8.9J	3.6J
	5/29/2014	810	2800	11J	5.0J	46J	7.1J	<48
	6/3/2015	150	3900	5.5J	3.2J	31	3.8J	1.1J

Notes:

** - Results compared to NYDEC Class GA water quality standards

J - Laboratory Result is less than the Reporting Limit but greater than or equal to the Method Detection Limit and the Results are shown in ug/L.

ATTACHMENT E

DISCHARGE MONITORING REPORTS

Ontario Specialty Contracting, Inc.
Environmental Remediation ♦ Demolition / Dismantlement ♦ Brownfield Redevelopment

April 30, 2015

Leslie Sedita
Industrial Waste Administrator
Buffalo Sewer Authority
90 West Ferry Street
Buffalo, New York, 14213

Subject: **South Buffalo Development Corporation, LLC**
Former Buffalo Color Corporation Site
Permit #14-06-BU109
OSC Project ID: 0913OMM

Dear Ms. Sedita:

On behalf of South Buffalo Development Corporation, LLC (SBD), Ontario Specialty Contracting, Inc. (OSC) is submitting the Discharge Monitoring Report for the Buffalo Color Remediation Site covering the period of January 2015 through March 2015. This Discharge Monitoring Report has been completed in accordance with the requirements of Permit #14-06BU109.

Included with the report are:

- Operation log sheets;
- Schematic showing the location for monitoring and sampling;
- Summary of the discharge flow by month;
- Comparison of analytical data to permit limits; and
- Analytical laboratory results.

Please review the attached information and feel free to contact me if you have any questions.

Sincerely,

Andrew D. Madden
Project Manager - *Ontario Specialty Contracting, Inc.*

cc:	Richard Galloway	Honeywell
	Eugene Melnyk	NYSDEC Region 9
	John Yensan	South Buffalo Development, LLC
	Daniel Forlastro	AMEC Environment & Infrastructure

Industrial Waste Section
Buffalo Sewer Authority Treatment Plant
90 West Ferry Street
Buffalo, New York, 14213

B.P.D.E.S. Permit No. #14-06-BU109
Former Buffalo Color Corporation Site
South Buffalo Development Corporation LLC (SBD)
Reporting Period: January 2015 through March 2015

The following is the discharge data associated with the operations of the former Buffalo Color Corporation Area A and D Groundwater Extraction System throughout the reporting period. A schematic representing the current locations for discharge sampling is provided as an attachment. The monthly flow data presented is based upon flow data from the Effluent No. 1 and Effluent No. 2 flow totalizers, which includes any flow from the Area D well pumping. All samples gathered were grab samples and analysis was provided by TestAmerica located in Amherst, NY. The sample event analytical results are attached.

Total Flow Data by Month:

January 2015	515,113 gallons
February 2015	454,844 gallons
March 2015	370,024 gallons

Total Quarterly Discharge 1,339,981 gallons

Estimated Area D contribution this period:
19,490 gallons

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including possibility of fine and imprisonment for knowing violations.

Andrew D. Madden
Project Engineer

Ontario Specialty Contracting, Inc.

Attachments:
Monitoring and Sampling Schematic, Field Data Collection Sheets, and Laboratory Analytical Results

Compliance Confirmation
Discharge Monitoring Report

BSA Permit No.	14-06-BU109	Effective June 1, 2014
Sample Date:	2/9/2015	Quarter: 1Q
Sample Location:	Onsite Pump Station to BSA	

Year: 2015
Sample Frequency Quarterly
Sample Month FEB

Event Group: SUMP
Lab Job ID: J75201-1

BSA Permit Parameter		Input Analytical Results			Converted Analytical Results		BSA Daily Max Discharge Limit		Permit Compliance	MAID mg/L	Quantity mg/L	Permit Compliance
Chemical	CAS No. / Method ID	Quantity	Reporting Limit	Unit	Quantity	Unit	Quantity	Unit				
pH	PH	8.61	0.100	SU	8.61	SU	5.0 - 12.0	SU	Yes			
BOD5	BOD	3.30	2.0	mg/L	3.3	mg/L	250	mg/L	Yes			
Total Phenol	TOTPHEN	0.03	0.010	mg/L	0.004	lbs/day	1.67	lbs/day	Yes	20	0.030	Yes
Total Chromium	7440-47-3	0.00	0.0040	mg/L	0.0003	lbs/day	0.83	lbs/day	Yes	40	0.00	Yes
Total Copper	7440-50-8	0.01	0.010	mg/L	0.002	lbs/day	0.67	lbs/day	Yes	16	0.0130	Yes
Lead	7439-92-1	ND	0.0050	mg/L	ND	lbs/day	0.541	lbs/day	Yes	65	ND	Yes
Total Mercury	7439-97-6	ND	0.00020	mg/L	ND	lbs/day	0.00033	lbs/day	Yes	0.0008	ND	Yes
Total Nickel	7440-02-0	0.00	0.010	mg/L	0.0002	lbs/day	1.17	lbs/day	Yes	14	0.0017	Yes
Zinc	7440-66-6	0.02	0.010	mg/L	0.003	lbs/day	2.046	lbs/day	Yes	25	0.024	Yes
Amendable Cyanide	CAN	ND	0.010	mg/L	ND	lbs/day	2.59	lbs/day	Yes	6.2	ND	Yes
Total PCB	Sum Method_E608	ND	0.059	ug/L	ND	lbs/day	0.0001	lbs/day	Yes	0.002	ND	Yes
Aniline or Aniline Derivative*	62-53-3	60.0	1900	ug/L	0.0075	lbs/day	50	lbs/day	Yes			
Benzene	71-43-2	14.0	25	ug/L	0.0017	lbs/day	0.059	lbs/day	Yes	0.142	0.014	Yes
Chlorobenzene	108-90-7	90.0	25	ug/L	0.0112	lbs/day	0.129	lbs/day	Yes	0.31	0.09	Yes
1,2-Dichlorobenzene	95-50-1	0.7	9.4	ug/L	0.0001	lbs/day	0.197	lbs/day	Yes	0.472	0.0007	Yes
Fluoranthene	206-44-0	ND	4.7	ug/L	ND	lbs/day	0.0417	lbs/day	Yes	0.1	ND	Yes
Acenaphthylene	208-96-8	ND	0.47	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Naphthalene	91-20-3	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Anthracene	120-12-7	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Fluorene	86-73-7	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Phenanthrene	85-01-8	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Max Individual Purgeables*	Max Method_E624	90	25	ug/L	0.090	mg/L	*	mg/L	Yes			
Total Suspended Solids	TSS	ND	4.0	mg/L	ND	mg/L	250	mg/L	Yes			
Total Phosphate**	7723-14-0	0.300	0.010	mg/L	0.300	mg/L	15.35	mg/L	Yes			
Total Flow (average)	N/A	10.34	-	gpm	14,889	gpd	50,000	gpd	Yes			

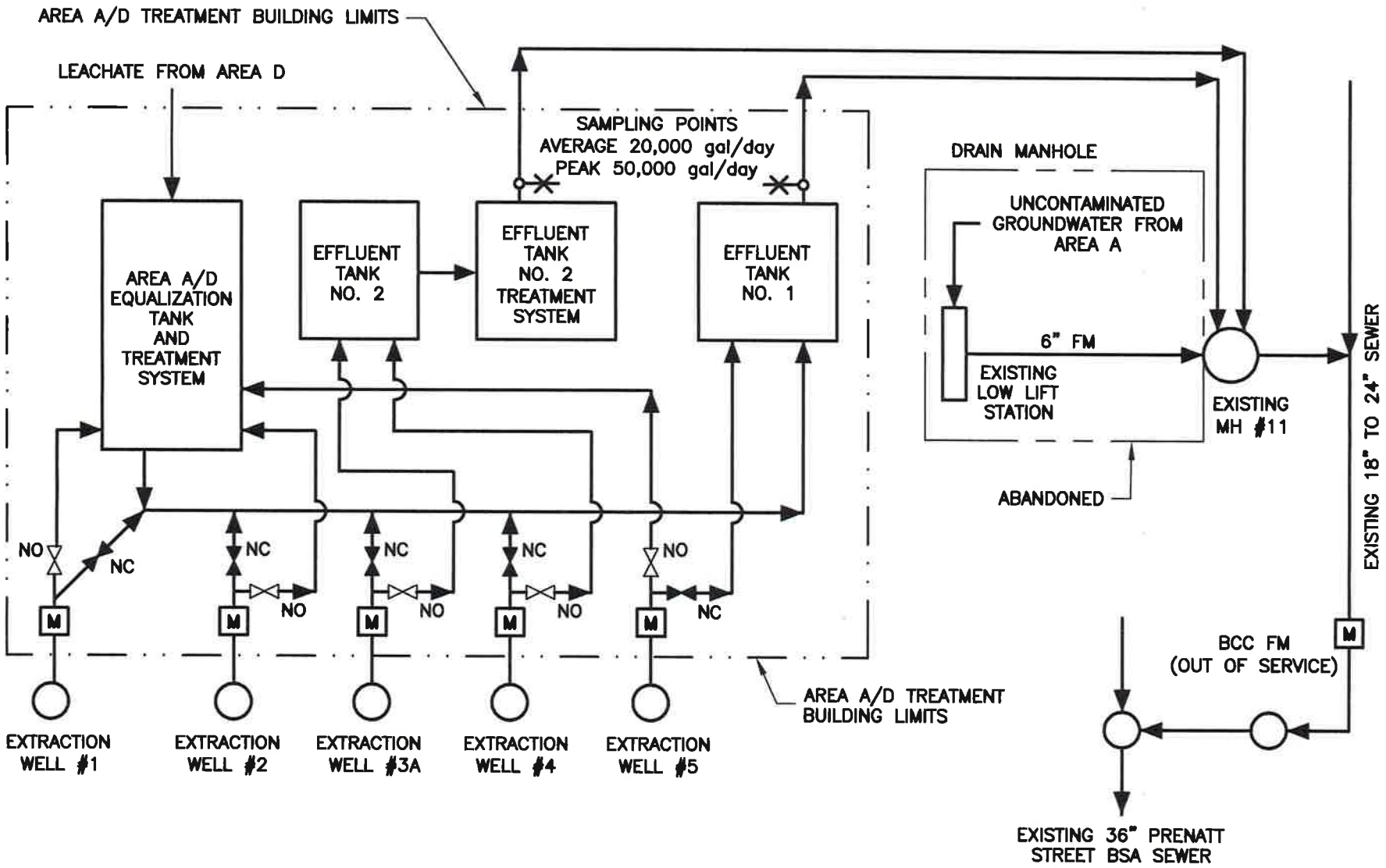
*Permit requires reporting of Aniline or Aniline Derivative and Max Individual Purgeables concentrations in excess of 0.01 mg/L.
**Analyzed by total phosphorus method SM 4500-P E
MAID - Maximum Allowable Instantaneous Discharge

Flow Calculations

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

Initial Reading	19,725,419	1/1/2015
Final Reading	21,065,400	3/31/2015
Total Days in Period	90	
Total Flow for Period	**1,339,981**	gallons
Average Flow for Period	**10.34**	gpm

Monitoring and Sampling Schematics



NC – NORMALLY CLOSED VALVE
NO – NORMALLY OPEN VALVE

FORMER BUFFALO COLOR CORPORATION SITE BUFFALO, NY	Ontario Specialty Contracting, Inc. Environmental Remediation • Demolition / Dismantlement • Brownfield Redevelopment	GROUNDWATER EXTRACTION SYSTEM PROCESS FLOW DIAGRAM Figure 1

Laboratory Analytical Results

Detection Summary

Client: Ontario Specialty Contracting, Inc.
Project/Site: Monthly BSA SUMP

TestAmerica Job ID: 480-75201-1

Client Sample ID: BCC BSA SUMP 0215

Lab Sample ID: 480-75201-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
1,2-Dichlorobenzene	0.72	J	5.0	0.44	ug/L	1		624	Total/NA
1,4-Dichlorobenzene	0.94	J	5.0	0.51	ug/L	1		624	Total/NA
Benzene	14		5.0	0.60	ug/L	1		624	Total/NA
Chlorobenzene	90		5.0	0.48	ug/L	1		624	Total/NA
Tetrachloroethene	8.3		5.0	0.34	ug/L	1		624	Total/NA
2-Chlorophenol	1.2	J	4.9	0.64	ug/L	1		625	Total/NA
Aniline	60		9.7	1.5	ug/L	1		625	Total/NA
Chromium	0.0027	J	0.0040	0.0010	mg/L	1		200.7 Rev 4.4	Total/NA
Copper	0.013	B	0.010	0.0016	mg/L	1		200.7 Rev 4.4	Total/NA
Nickel	0.0017	J	0.010	0.0013	mg/L	1		200.7 Rev 4.4	Total/NA
Zinc	0.024	B	0.010	0.0015	mg/L	1		200.7 Rev 4.4	Total/NA
Phenolics, Total Recoverable	0.030		0.010	0.0050	mg/L	1		420.4	Total/NA
Cyanide, Amenable	0.032		0.010	0.0050	mg/L	1		SM 4500 CN G	Total/NA
Phosphorus	0.30		0.010	0.0050	mg/L as P	1		SM 4500 P E	Total/NA
Biochemical Oxygen Demand	3.3	b	2.0	2.0	mg/L	1		SM 5210B	Total/NA
Analyte	**Result**	**Qualifier**	**RL**	**RL**	**Unit**	**Dil Fac**	**D**	**Method**	**Prep Type**
pH	8.61	HF	0.100	0.100	SU	1		SM 4500 H+ B	Total/NA

Client Sample ID: TRIP BLANK

Lab Sample ID: 480-75201-2

No Detections.

This Detection Summary does not include radiochemical test results.

Field Data Collection Sheets

Buffalo Color GWTF Weekly Process Assessment

		Bag Filter F-1A/1B		Bag Filter F-2A/2B		Multi-Media Filter F-30		LGAC CA-40 and CA-41						Effluent Tank No. 1 T-28				Effluent Tank No. 2 T-27			Discharge Lines To BSA Sump					
Date	Associate	Influent Pressure PI-1A	Effluent Pressure PI-1B	Influent Pressure PI-107A	Effluent Pressure PI-107B	Influent Pressure PI-30A	Effluent Pressure PI-30B	Flow Rate FE-50	Lead Influent Pressure PI-40A	Lead Effluent Pressure PI-40B	Lag Influent Pressure PI-41A	Lag Effluent Pressure PI-41B	PH Meter	Pressure PI-106A/B	Flow Rate FE-106	Totalizer FE-106	Pressure PI-106C	Flow Rate FE-107	Totalizer FE-107	Pressure PI-107C	Leak Detection Vault No. 2 Pressure PI-106D	Leak Detection Vault No. 1 Pressure PI-107D	Leak Detection Vault No. 3 Pressure PI-106E	Leak Detection Vault No. 3 Pressure PI-107E	Containment Line Pressure Gauge Checks	Comments
1/9/2015	TW	48	34	32	21	35	13	18.1	11	7	8	5	7.16	21	15.8	11,518,819	19	23.1	8,384,658	14	10	10	3	4	y	
1/16/2015	TW	48	42	32	24	41	25	27.9	21	14	15	8	7.14	21	14.9	11,591,912	19	24.2	8,442,212	15	8	10	4	4	y	
1/23/2015	TW	47	43	32	23	42	27	28.7	22	16	15	10	7.16	21	13.6	11,666,124	20	19.4	8,497,384	10	9	10	3	3	y	
1/29/2015	TW	48	37	32	25	37	17	21.9	14	10	10	7	7,43	21	13.4	11,706,641	20	23.2	8,533,891	13	7	9	3	3	y	
2/6/2015	TW	47	31	32	26	32	30	24.6	16	12	12	7	7.21	20	14.5	11,750,747	22	26.2	8,574,605	17	8	9	3	1	y	
3/1/2015	AM	48	39	32	27	41	26	18	20	17	17	14	7	20	13.9	11,975,167	20.5	18.4	8,720,209	13	8	9	3	1	y	

Buffalo Color GWTF Daily Maintenance & Repair Log													
DATE	D1A GAC SERVICE	D1B GAC SERVICE	D2 GAC SERVICE	MMF SERVICE	D1A GAC FLUSH	D1B GAC FLUSH	D2 GAC FLUSH	MMF FLUSH	BF 1A CHANGE	BF 1B CHANGE	BF 2A CHANGE	BF 2B CHANGE	ADDITIONAL NOTES / NON ROUTINE REPAIR & MAINTENANCE
1/1/2015													
1/2/2015													
1/3/2015								1	1	1			
1/4/2015													
1/5/2015								1	1	1			
1/6/2015									1	1			
1/7/2015							1	1	2	1	1	1	
1/8/2015										1			
1/9/2015					1	1		1	1	1			
1/10/2015													
1/11/2015													
1/12/2015								1	1	1			
1/13/2015													
1/14/2015					1	1	1	1	1	1	1	1	
1/15/2015								1	1	1			
1/16/2015					1	1		1	1	1			
1/17/2015													
1/18/2015													
1/19/2015								1	1	1			
1/20/2015								1	1	1			
1/21/2015								1	1	1			Ran Area D Wells
1/22/2015													
1/23/2015					1	1		1	1	1			Jetter clean Well #2
1/24/2015													
1/25/2015													
1/26/2015					1	1	1	1	1	1	1	1	
1/27/2015		1											C C (cyclesorb)
1/28/2015									1	1			
1/29/2015													
1/30/2015									1	1			
1/31/2015													
2/1/2015								1					
2/2/2015													
2/3/2015									1	1			
2/4/2015								1					
2/5/2015					1	1	1	1	1	1	1	1	
2/6/2015								1	1	1			
2/7/2015													
2/8/2015					1	1	1	1	1	1	1	1	
2/9/2015													
2/10/2015									1	1			New Pump, Motor, wire A-#3 well
2/11/2015													
2/12/2015													
2/13/2015									1	1			
2/14/2015													
2/15/2015													
2/16/2015									1	1			
2/17/2015													
2/18/2015									1	1			
2/19/2015													
2/20/2015					1	1			1	1			
2/21/2015													
2/22/2015													
2/23/2015													
2/24/2015													

Buffalo Color GWTF Daily Maintenance & Repair Log													
DATE	D1A GAC SERVICE	D1B GAC SERVICE	D2 GAC SERVICE	MMF SERVICE	D1A GAC FLUSH	D1B GAC FLUSH	D2 GAC FLUSH	MMF FLUSH	BF 1A CHANGE	BF 1B CHANGE	BF 2A CHANGE	BF 2B CHANGE	ADDITIONAL NOTES / NON ROUTINE REPAIR & MAINTENANCE
2/25/2015													
2/26/2015													
2/27/2015													
2/28/2015													
3/1/2015													
3/2/2015					1	1	1	1	3	3	1	1	
3/3/2015									1	1			
3/4/2015													Changed Pump #4
3/5/2015									1	1			
3/6/2015													
3/7/2015													
3/8/2015													
3/9/2015													
3/10/2015													
3/11/2015													
3/12/2015													
3/13/2015													
3/14/2015													
3/15/2015													
3/16/2015													
3/17/2015													
3/18/2015													
3/19/2015													
3/20/2015													
3/21/2015													
3/22/2015													
3/23/2015													
3/24/2015													
3/25/2015					1	1	1		2	2			
3/26/2015													Changed pump, motor Well #4
3/27/2015									1	1			Changed pump #5
3/28/2015													Changed transducer #4
3/29/2015													
3/30/2015													
3/31/2015								1	1				

July 31, 2015

Leslie Sedita
Industrial Waste Administrator
Buffalo Sewer Authority
90 West Ferry Street
Buffalo, New York, 14213

Subject: **South Buffalo Development Corporation, LLC**
Former Buffalo Color Corporation Site
Permit #14-06-BU109
OSC Project ID: 0913OMM

Dear Ms. Sedita:

On behalf of South Buffalo Development Corporation, LLC (SBD), Ontario Specialty Contracting, Inc. (OSC) is submitting the Discharge Monitoring Report for the Buffalo Color Remediation Site covering the period of April 2015 through June 2015. This Discharge Monitoring Report has been completed in accordance with the requirements of Permit #14-06BU109.

Included with the report are:

- Operation log sheets;
- A copy of the current BSA discharge permit;
- Schematic showing the location for monitoring and sampling;
- Summary of the discharge flow by month;
- Comparison of analytical data to permit limits; and
- Analytical laboratory results.

Please review the attached information and feel free to contact me if you have any questions.

Sincerely,

Andrew D. Madden
Project Manager - *Ontario Specialty Contracting, Inc.*

cc:	Richard Galloway	Honeywell
	Eugene Melnyk	NYSDEC Region 9
	John Yensan	South Buffalo Development, LLC
	Daniel Forlastro	AMEC Environment & Infrastructure

Industrial Waste Section
Buffalo Sewer Authority Treatment Plant
90 West Ferry Street
Buffalo, New York, 14213

B.P.D.E.S. Permit No. #14-06-BU109
Former Buffalo Color Corporation Site
South Buffalo Development Corporation LLC (SBD)
Reporting Period: April 2015 through June 2015

The following is the discharge data associated with the operations of the former Buffalo Color Corporation Area A and D Groundwater Extraction System throughout the reporting period. A schematic representing the current locations for discharge sampling is provided as an attachment. The monthly flow data presented is based upon flow data from the Effluent No. 1 and Effluent No. 2 flow totalizers, which includes any flow from the Area D well pumping. All samples gathered were grab samples and analysis was provided by TestAmerica located in Amherst, NY. The sample event analytical results are attached.

Total Flow Data by Month:

April 2015	510,975 gallons
May 2015	575,379 gallons
June 2015	541,513 gallons

Total Quarterly Discharge 1,627,867 gallons

Estimated Area D contribution this period:
5,560 gallons

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including possibility of fine and imprisonment for knowing violations.

Andrew D. Madden
Project Manager

Ontario Specialty Contracting, Inc.

Attachments:
Current BSA Discharge Permit, Monitoring and Sampling Schematic, Field Data Collection Sheets, and Laboratory Analytical Results

Compliance Confirmation
Discharge Monitoring Report

BSA Permit No.	14-06-BU109	Effective June 1, 2014
Sample Date:	7/9/2015	Quarter: 2Q
Sample Location:	Onsite Pump Station to BSA	

Year: 2015
Sample Fequency Quarterly

Event Group: SUMP
Lab Job ID: J83614-1

BSA Permit Parameter		Input Analytical Results			Converted Analytical Results		BSA Daily Max Discharge Limit		Permit Compliance	MAID mg/L	Quantity mg/L	Permit Compliance
Chemical	CAS No. / Method ID	Quantity	Reporting Limit	Unit	Quantity	Unit	Quantity	Unit				
pH	PH	6.25	0.100	SU	6.25	SU	5.0 - 12.0	SU	Yes			
BOD5	BOD	ND	2.0	mg/L	ND	mg/L	250	mg/L	Yes			
Total Phenol	TOTPHEN	0.02	0.010	mg/L	0.003	lbs/day	1.67	lbs/day	Yes	20	0.023	Yes
Total Chromium	7440-47-3	0.00	0.0040	mg/L	0.0006	lbs/day	0.83	lbs/day	Yes	40	0.00	Yes
Total Copper	7440-50-8	0.00	0.010	mg/L	0.001	lbs/day	0.67	lbs/day	Yes	16	0.0047	Yes
Lead	7439-92-1	ND	0.0050	mg/L	ND	lbs/day	0.541	lbs/day	Yes	65	ND	Yes
Total Mercury	7439-97-6	ND	0.00020	mg/L	ND	lbs/day	0.00033	lbs/day	Yes	0.0008	ND	Yes
Total Nickel	7440-02-0	0.00	0.010	mg/L	0.0004	lbs/day	1.17	lbs/day	Yes	14	0.0027	Yes
Zinc	7440-66-6	0.00	0.010	mg/L	0.000	lbs/day	2.046	lbs/day	Yes	25	0.002	Yes
Amendable Cyanide	CAN	ND	0.010	mg/L	ND	lbs/day	2.59	lbs/day	Yes	6.2	ND	Yes
Total PCB	Sum Method_E608	ND	0.059	ug/L	ND	lbs/day	0.0001	lbs/day	Yes	0.002	ND	Yes
Aniline or Aniline Derivative*	62-53-3	3.4	1900	ug/L	0.0005	lbs/day	50	lbs/day	Yes			
Benzene	71-43-2	ND	25	ug/L	ND	lbs/day	0.059	lbs/day	Yes	0.142	ND	Yes
Chlorobenzene	108-90-7	1.9	25	ug/L	0.0003	lbs/day	0.129	lbs/day	Yes	0.31	0.00	Yes
1,2-Dichlorobenzene	95-50-1	ND	9.4	ug/L	ND	lbs/day	0.197	lbs/day	Yes	0.472	ND	Yes
Fluoranthene	206-44-0	ND	4.7	ug/L	ND	lbs/day	0.0417	lbs/day	Yes	0.1	ND	Yes
Acenaphthylene	208-96-8	ND	0.47	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Naphthalene	91-20-3	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Anthracene	120-12-7	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Fluorene	86-73-7	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Phenanthrene	85-01-8	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Max Individual Purgeables*	Max Method_E624	2	25	ug/L	0.002	mg/L	*	mg/L	Yes			
Total Suspended Solids	TSS	7.6	4.0	mg/L	7.6	mg/L	250	mg/L	Yes			
Total Phosphate**	7723-14-0	0.270	0.010	mg/L	0.270	mg/L	15.35	mg/L	Yes			
Total Flow (average)	N/A	12.42	-	gpm	17,889	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	21,038,970	4/1/2015
Final Reading	22,666,837	6/30/2015
Total Days in Period	91	
Total Flow for Period	**1,627,867**	gallons
Average Flow for Period	**12.42**	gpm

BSA Discharge Permit

BUFFALO SEWER AUTHORITY

ADMINISTRATIVE OFFICES
1038 CITY HALL
65 NIAGARA SQUARE
BUFFALO, NY 14202-3378
PHONE: (716) 851-4664
FAX: (716) 856-5810

WASTEWATER TREATMENT PLANT
FOOT OF WEST FERRY
90 WEST FERRY STREET
BUFFALO, NY 14213-1799
PHONE: (716) 883-1820

February 11, 2014

Andrew Madden
Manager
South Buffalo Development, LLC.
333 Ganson Street
Buffalo, New York 14203

Re: BPDES Permit No. 14-06-BU109

Dear Mr. Madden:

Enclosed is your BPDES Permit No. 14-06-BU109. This permit is issued by the BSA and allows your facility to discharge process wastes to the sanitary sewers.

This original permit must be maintained at your Buffalo facility and must be available for inspection at all times. It is your responsibility to assure continual compliance with the terms and conditions of this permit. Finally, you must apply for renewal at least six (6) months before this permit expires.

If you have any questions, please call Dennis W. Young at 851-4664, ext. 5256.

Very truly yours,

By:

Leslie Sedita
Industrial Waste Administrator
Industrial Waste Section

cc: M. Letina

I\WPD\JK\SBDLLC1406bu109permitltr

AUTHORIZATION TO DISCHARGE UNDER THE BUFFALO POLLUTANT DISCHARGE ELIMINATION SYSTEM

PERMIT NO. 14-06-BU109
EPA 40CFR 403

In accordance with the provisions of the Federal Water Pollution Control Act, as amended, and the Sewer Regulations of the Buffalo Sewer Authority, authorization is hereby granted to:

South Buffalo Development, LLC.

to discharge remediated wastewater from the site located at:

Areas A and D of the former Buffalo Color Corporation Site

1037 South Park Avenue, Buffalo, New York 14210

to the Buffalo Municipal Sewer System.

Issuance of this permit is based upon a permit application filed on **February 4, 2014** and analytical data. This permit is granted in accordance with discharge limitations, monitoring requirements and other conditions set forth in Parts I and II hereof.

Effective this June 1, 2014

To Expire May 31, 2017

General Manager

Signed this 16th **day of** February **, 2014**

PART I: SPECIFIC CONDITIONS

A. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

During the period beginning the effective date of this Permit and lasting until the expiration date, discharge from the permitted facility outfalls (see attached maps) shall be limited and monitored **Quarterly** by the permittee as specified below:

Sample		Discharge Limitations		Sampling Requirements	
Point	**Parameter**	**Daily Max**	**MAID*** (mg/L)	**Type**	**Frequency**
001	pH[1]	5.0 - 12.0 SU		Probe	**Quarterly**
	Total Flow	50,000 gals		Flow Meter[2]	**Continuous**
	BOD_5	250 mg/L [3]		Composite [4]	**Quarterly**
	Total Suspended Solids	250 mg/L [3]		Composite	**Quarterly**
	Total Phosphate	15.35 mg/L[3]		Composite	**Quarterly**
	Total Phenol[5]	1.67 lbs	20.0	Composite	**Quarterly**
	Amenable Cyanide	2.59 lbs	6.2	Grab [7]	**Quarterly**
	Total Mercury	0.00033 lbs	0.0008	Composite	**Quarterly**
	Total Nickel	1.17 lbs	14.0	Composite	**Quarterly**
	Total Copper	0.67 lbs	16.0	Composite	**Quarterly**
	Total Chromium	0.83 lbs	40.0	Composite	**Quarterly**
	Lead	0.541 lbs	65.0	Composite	**Quarterly**
	Zinc	2.046 lbs	25.0	Composite	**Quarterly**
	Purgeables-EPA Test Methods 624	[6]		Grab[7]	**Quarterly**
	Base/Neutrals & Acid Extractable-EPA Tests Method 625	[8]		Composite	**Quarterly**
	Total PCB's	0.000 lbs	0.002	Composite	**Quarterly**
	Aniline	50.0 lbs	0.00	Composite	**Quarterly**
	Benzene	0.059 lbs	0.142 mg/L	Composite	**Quarterly**
	Chlorobenzene	0.129 lbs	0.310 mg/L	Composite	**Quarterly**
	1, 2-Dichlorbenzene	0.197 lbs.	0.472 mg/L	Composite	**Quarterly**
	Fluoranthene	0.0417 lbs.	0.100 mg/L	Composite	**Quarterly**
	Acenaphtylene	0.131 lbs.	0.314 mg/L	Composite	**Quarterly**
	Naphthalene	0.131 lbs.	0.314 mg/L	Composite	**Quarterly**
	Anthracene	0.131 lbs.	0.314 mg/L	Composite	**Quarterly**

Sample Point	Parameter	Discharge Limitations Daily Max	Maid*	Sampling Requirements Type	Frequency
	Fluorene	0.131 lbs.	0.314 mg/L	Composite	**Quarterly**
	Phenanthrene	0.131 lbs.	0.314 mg/L	Composite	**Quarterly**

*M.A.I.D. – Maximum Allowable Instantaneous Discharge – Slug Limit.
SEE PAGE FOUR (4) FOR EXPLANATION OF SPECIFIC REQUIREMENTS.

PART I: SPECIFIC CONDITIONS

B. DISCHARGE MONITORING REPORTING REQUIREMENTS

During the period beginning the effective date of this permit and lasting until the expiration date, discharge monitoring results shall be summarized and reported quarterly by the permittee on the days specified below:

Sample Point	Parameter	Reporting Requirements	
		Initial Report	**Subsequent Reports**
001	All analytes	July 31, 2011	Every July 31, October 31, January 31, April 30**

** Each reporting dated is for samples collected during the previous quarter.

PART I: SPECIFIC CONDITIONS

C. SPECIAL REQUIREMENTS

(1) The pH meter must be calibrated and maintained in accordance with the manufacturer's specifications. The calibrations and the person(s) responsible for it must be recorded in a bound logbook. This logbook must be available for BSA inspection at all times.

(2) All flow meters must be calibrated and certified by a certified manufacturer's representative at least once per year. This report must be submitted with the annual report. All flow meters must be serviced and maintained in accordance with the manufacturer's specifications. The BSA must be notified of any malfunctions which last for more that 24 hours within three (3) days of the malfunction. If a flow meter, especially at SP001, remains out of service for more than five (5) consecutive days, the permittee must install a temporary meter until such time as the defective meter is repaired or replaced. The BSA at its option, may require a written report on any malfunctions.

(3) Surchargeable limit only.

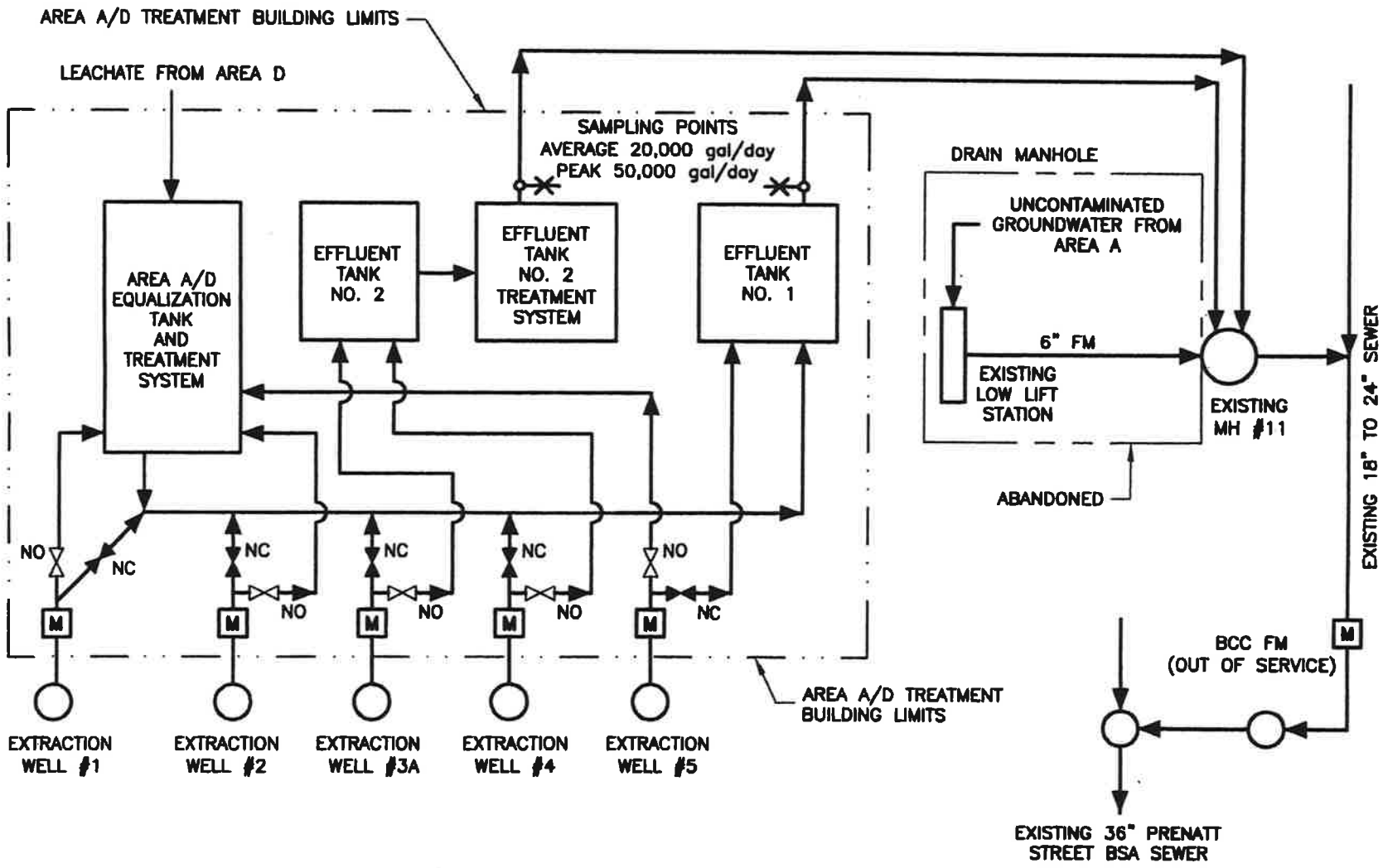
(4) Composite samples may be flow proportioned.

(5) EPA Test Method 604.

(6) The permittee must report any compound whose concentration is greater than 0.01 mg/L. The permittee is not authorized to discharge any of the parameters evaluated by these test procedures which may cause or contribute to a violation of water quality standards, worker health or safety limits or harm the sewerage system. Any parameter detected may at the discretion of the Buffalo Sewer Authority, be specifically limited and incorporated into this permit.

(7) Four grab samples must be properly taken and preserved over an equally spaced time period during a normal discharge day. The four grab samples must be flow proportionally composited at a New York State Department of Health certified lab.

(8) All samples collected for the base neutral and acid extractable EPA analytical test procedures must go through a special cleanup to prevent aniline and aniline derivative interference of the analytical method. The permittee must report any aniline and aniline derivative whose concentration is greater that 0.01 mg/L.



FORMER BUFFALO COLOR CORPORATION SITE BUFFALO, NY	Ontario Specialty Contracting, Inc. Environmental Remediation • Demolition / Dismantlement • Brownfield Redevelopment	GROUNDWATER EXTRACTION SYSTEM PROCESS FLOW DIAGRAM Figure 1

BUFFALO POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

PART II: GENERAL CONDITIONS

A. MONITORING AND REPORTING

1. Local Limits

Except as otherwise specified in this permit, the permit holder shall comply with all specific prohibitions, limits on pollutants or pollutant parameters set forth in the Buffalo Sewer Authority Sewer Use Regulations, as amended from time to time, and such prohibitions, limits and parameters shall be deemed pretreatment standards for purposes for the Clean Water Act.

2. Definitions

Definitions of terms contained in this permit are as defined in the Buffalo Sewer Authority Sewer Use Regulations.

3. Discharge Sampling Analysis

All Wastewater discharge samples and analyses and flow measurements shall be representative of the volume and character of the monitored discharge. Methods employed for flow measurements and sample collections and analyses shall conform to the Buffalo Sewer Authority "Sampling Measurement and Analytical Guidelines Sheet".

4. Recording of Results

For each measurement or sample taken pursuant to the requirements of the permit, the permittee shall record the information as required in the "Sampling Measurement and Analytical Guidelines Sheet".

5. Additional Monitoring by Permittee

If the permittee monitors any pollutants at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified in 40 CFR Part 136 the results of such monitoring shall be included in the calculation and reporting of values required under Part I, B. Such increased frequency shall also be indicated.

6. Reporting

All reports prepared in accordance with this Permit shall be submitted to:

Industrial Waste Section
Buffalo Sewer Authority Treatment Plant
90 West Ferry Street
Buffalo, New York 14213

All self-monitoring reports shall be prepared in accordance with the BSA "Sampling Measurement and Analytical Guidelines Sheet". These reporting requirements shall not relieve the permittee of any other reports, which may be required by the N.Y.S.D.E.C. or the U.S.E.P.A.

7. Certification Statement

All self-monitoring reports shall include the following certification statement, signed by the preparer of the report:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

B. PERMITTEE REQUIREMENTS

1. Change in Discharge [revised 08/2013]

All discharges authorized herein shall be consistent with the terms and conditions of this permit and with the information contained in the BPDES permit application on which basis this permit is granted. In the event of any facility expansions, production increases, process modifications or the installation, modification or repair of any pretreatment equipment which may result in new, different or increased discharges of pollutants, a new BPDES Permit application must be submitted prior to any change. Following receipt of an amended application, the BSA may modify this permit to specify and limit any pollutants not previously limited. In the event that the proposed change will be covered under an applicable Categorical Standard, a Baseline Monitoring Report must be submitted at least ninety (90) days prior to any discharge. A Baseline Monitoring Report shall be prepared in accordance with the BSA "Sampling Measurement and Analytical Guidelines Sheet".

2. Records Retention

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed, calibration and maintenance of instrumentation, and recordings from continuous monitoring instrumentation shall be retained at this facility for a minimum of three (3) years, or longer if requested by the General Manager.

3. Spill Prevention and Control Plan [added 08/2013]

The permittee shall have a plan to prevent and control spills into the sewer system. The plan shall be prepared in accordance with the BSA "Sampling Measurement and Analytical Guidelines Sheet"

4. Notification of Slug, Accidental Discharge or Spill

In the event that a slug, accidental discharge or any spill occurs at the facility for which this permit is issued, it is the responsibility of the permittee to immediately notify the B.S.A. Treatment Plant at 883-1820 of the quantity and character of such discharge. During normal business hours, Monday – Friday, 7:30 AM – 3:00 PM call 851-4661, ext. 5374. After 3:00 PM call ext. 851-4664, ext. 600. If requested by the B.S.A., Within five (5) days following all such discharges, the permittee shall submit a report describing the character and duration of the discharge, the cause of the discharge, and measures taken or that will be taken to prevent a recurrence of such discharge.

5. Noncompliance Notification [Revised 08/2013]

If, for any reason, the permittee does not comply with or will be unable to comply with any discharge limitation specified in this permit, the permittee or their assigns must verbally notify the Industrial Waste Section at 883-1820 851-4664, ext. 5374 within twenty-four (24) hours of becoming aware of the violation. The permittee shall also provide the Industrial Waste Section with the following information, in writing, within five (5) days of becoming aware of such condition:

a. a description of the discharge and cause of noncompliance and;

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

Additionally, the permittee shall repeat the sampling and analysis and submit these results of the report analysis to the Industrial Waste Section within 30 days after

becoming aware of the violation.

6. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the Buffalo Sewerage System resulting from noncompliance with any discharge limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

7. Waste Residuals

Solids, sludges, filter backwash or other pollutants removed in the course of treatment or control of wastewaters and/or the treatment of intake waters, shall be disposed of in a manner such as to prevent any pollutant from such materials from entering the Buffalo Sewer System.

8. Power Failures

In order to maintain compliance with the discharge limitations and prohibitions of this permit, the permittee shall provide an alternative power source sufficient to operate the wastewater control facilities; or, if such alternative power source is not provided the permittee shall halt, reduce or otherwise control production and/or controlled discharges upon the loss of power to the wastewater control facilities.

9. Treatment Upsets

a. Any industrial user which experiences an upset in operations that places it in a temporary state of noncompliance, which is not the result of operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation, shall inform the Industrial Waste Section immediately upon becoming aware of the upset. Where such information is given verbally, a written report shall be filed by the user within five (5) days. The report shall contain:

(i) A description of the upset, its cause(s) and impact on the discharger's compliance status;

(ii) The duration of noncompliance, including exact dates and times of noncompliance, and if the non-compliance is continuing, the time by which compliance is reasonably expected to be restored;

(iii) All steps taken or planned to reduce, eliminate, and prevent recurrence of such an upset.

b. An industrial user which complies with the notification provisions of this Section in a timely manner shall have an affirmative defense to any enforcement action brought by the Industrial Waste Section for any noncompliance of the limits in this permit, which arises out of violations attributable to and alleged to have occurred during the period of the documented and verified upset.

10. Treatment Bypasses

a. A bypass of the treatment system is prohibited unless the following conditions are met:

(i) The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; or

(ii) There was no feasible alternative to the bypass, including the use of auxiliary treatment or retention of the wastewater; and

(iii) The industrial user properly notified the Industrial Waste Section as described in paragraph b. below.

b. Industrial users must provide immediate notice to the Industrial Waste Section upon discovery of an unanticipated bypass. If necessary, the Industrial Waste Section may require the industrial user to submit a written report explaining the cause(s), nature, and duration of the bypass, and the steps being taken to prevent it's recurrence.

c. An industrial user may allow a bypass to occur which does not cause pretreatment standards or requirements to be violated, but only if it is for essential maintenance to ensure efficient operation of the treatment system. Industrial users anticipating a bypass must submit notice to the Industrial Waste Section at least ten (10) days in advance. The Industrial Waste Section may only approve the anticipated bypass if the circumstances satisfy those set forth in paragraph a. above.

C. PERMITTEE RESPONSIBILITIES

1. Permit Availability

The originally signed permit must be available upon request at all times for review at the address stated on the first page of this permit.

2. Inspections

The permittee shall allow the General Manager of the Buffalo Sewer Authority

and/or his authorized representatives, upon the presentation of credentials and during normal working hours or at any other reasonable times, to have access to and copy any records required in this permit; and to sample any discharge of pollutants.

3. Transfer of Ownership or Control

In the event of any change in control or ownership of facilities for which this permit has been issued the permit shall become null and void. The succeeding owner shall submit a completed Buffalo Sewer Authority permit application prior to discharge to the sewer system.

D. PERMITTEE LIABILITIES

1. Permit Modification

After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to the following:

a. Violation of any terms or conditions of this permit,

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts,

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

2. Imminent Danger

In the event there exists an imminent danger to health or property, the permitter reserves the right to take immediate action to halt the permitted discharge to the sewerage works.

3. Civil and Criminal Liability

Nothing in this permit shall relieve the permittee from any requirements, liabilities, or penalties under provisions of the "Sewer Regulations of the Buffalo Sewer Authority" or any Federal, State and/or local laws or regulations.

4. Penalties for Violations of Permit Conditions

The "Sewer Regulations of the Buffalo Sewer Authority" and the "Sewer Regulations for Erie County Sewer Districts" provides that any person who violates a B.P.D.E.S. permit condition is liable to the Authority for a civil penalty of up to $10,000.00 per day for each violation. Any person who willfully or negligently violates permit

conditions will be referred to the New York State Attorney General.

E. NATIONAL PRETREATMENT STANDARDS

If a pretreatment standard or prohibition (including any Schedule of Compliance specified in such pretreatment standard or prohibition) is established under Section 307 (b) of the Act for a pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with such pretreatment standard or prohibition.

F. PLANT CLOSURE

In the event of plant closure, the permittee is required to notify the Industrial Waste Section in writing as soon as an anticipated closure date is determined, but in no case later than five days of the actual closure.

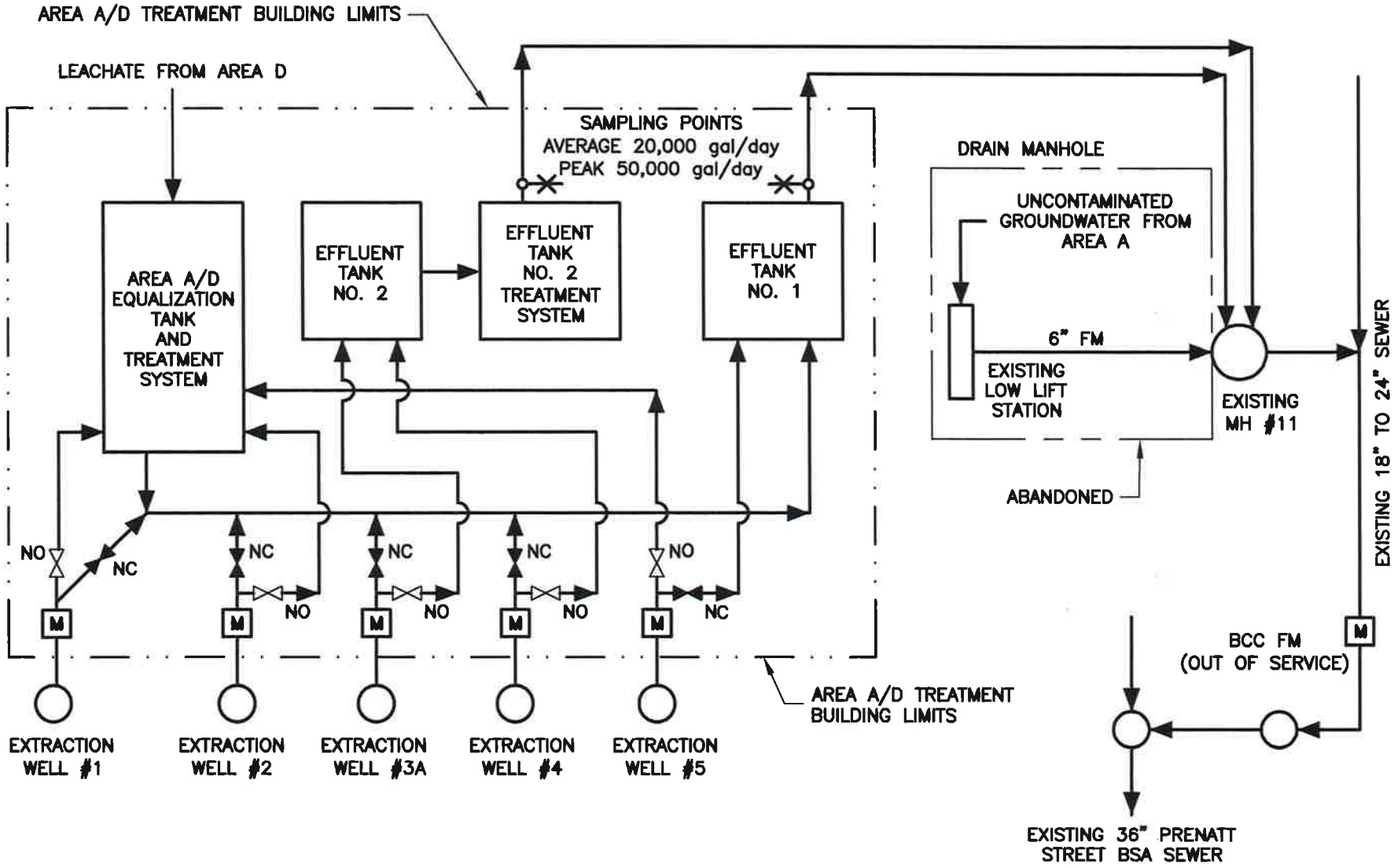
G. CONFIDENTIALITY

Except for data determined to be confidential under Section 308 of the Act, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Buffalo Sewer Authority. As required by the Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the Act.

H. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

Monitoring and Sampling Schematics



NC – NORMALLY CLOSED VALVE
NO – NORMALLY OPEN VALVE

FORMER BUFFALO COLOR CORPORATION SITE BUFFALO, NY	Ontario Specialty Contracting, Inc. Environmental Remediation • Demolition / Dismantlement • Brownfield Redevelopment	GROUNDWATER EXTRACTION SYSTEM PROCESS FLOW DIAGRAM Figure 1

Laboratory Analytical Results

Detection Summary

Client: Ontario Specialty Contracting, Inc.
Project/Site: OSC- Former Buffalo Color Sites - 37745

TestAmerica Job ID: 480-83614-1

Client Sample ID: BCC BSA SUMP_0615

Lab Sample ID: 480-83614-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Chlorobenzene	1.9	J	5.0	0.48	ug/L	1		624	Total/NA
Aniline	3.4	J	9.6	1.4	ug/L	1		625	Total/NA
Bis(2-ethylhexyl) phthalate	5.1	J B	9.6	1.2	ug/L	1		625	Total/NA
Di-n-butyl phthalate	53		4.8	1.5	ug/L	1		625	Total/NA
Chromium	0.0040		0.0040	0.0010	mg/L	1		200.7 Rev 4.4	Total/NA
Copper	0.0047	J	0.010	0.0016	mg/L	1		200.7 Rev 4.4	Total/NA
Nickel	0.0027	J	0.010	0.0013	mg/L	1		200.7 Rev 4.4	Total/NA
Zinc	0.0017	J	0.010	0.0015	mg/L	1		200.7 Rev 4.4	Total/NA
Phenolics, Total Recoverable	0.023		0.010	0.0050	mg/L	1		420.4	Total/NA
Cyanide, Amenable	0.066		0.010	0.0050	mg/L	1		SM 4500 CN G	Total/NA
Phosphorus	0.27	B	0.010	0.0050	mg/L as P	1		SM 4500 P E	Total/NA

Analyte	Result	Qualifier	RL	RL	Unit	Dil Fac	D	Method	Prep Type
Total Suspended Solids	7.6		4.0	4.0	mg/L	1		SM 2540D	Total/NA
pH	6.25	HF	0.100	0.100	SU	1		SM 4500 H+ B	Total/NA

Client Sample ID: TRIP BLANK

Lab Sample ID: 480-83614-2

No Detections.

This Detection Summary does not include radiochemical test results.

Field Data Collection Sheets

Buffalo Color GWTF Weekly Process Assessment

		Bag Filter F-1A/1B		Bag Filter F-2A/2B		Multi-Media Filter F-30		LGAC CA-40 and CA-41						Effluent Tank No. 1 T-28				Effluent Tank No. 2 T-27			Discharge Lines To BSA Sump					
Date	Associate	Influent Pressure PI-1A	Effluent Pressure PI-1B	Influent Pressure PI-107A	Effluent Pressure PI-107B	Influent Pressure PI-30A	Effluent Pressure PI-30B	Flow Rate FE-60	Lead Influent Pressure PI-40A	Lead Effluent Pressure PI-40B	Lag Influent Pressure PI-41A	Lag Effluent Pressure PI-41B	PH Meter	Pressure PI-106A/B	Flow Rate FE-106	Totalizer FE-106	Pressure PI-106C	Flow Rate FE-107	Totalizer FE-107	Pressure PI-107C	Leak Detection Vault No. 1 Pressure PI-106D	Leak Detection Vault No. 1 Pressure PI-107D	Leak Detection Vault No. 3 Pressure PI-106E	Leak Detection Vault No. 3 Pressure PI-107E	Containment Line Pressure Gauge Checks	Comments
4/3/2015	TW	50	48	33	29	50	22	12	24	22	23	22	7.39	20	13.2	12,199,587	19	10.6	8,865,813	10						
4/10/2015	TW	49	49	33	25	51	41	15.7	40	39	38	37	7.4	36	15.4	12,278,729	34	16.3	8,932,550	11	10	7	5	4	y	
4/17/2015	TW	49	49	33	27	51	40	15.4	40	37	37	36	7.67	35	14.9	12,350,064	33	21.1	8,992,252	13						
4/24/2015	TW	49	49	33	27	51	39	15.5	38	36	36	35	7.45	34	14.2	12,413,155	32	20.3	9,043,953	11						
5/1/2015	TW	49	43	33	25	45	32	14.8	35	32	32	31	7.52	30	13.1	12,457,560	29	19.9	9,092,385	10	8	7	2	3	y	
5/8/2015	TW	50	45	34	29	49	16	13.9	27	24	24	22	7.3	21	13.9	12,528,708	20	20.2	9,151,485	12	6	7	2	2	y	
5/15/2015	TW	50	45	34	29	49	16	13.9	18	15	15	13	7.23	12	11	12,596,768	12	19.7	9,208,838	12	7	6	2	3	y	
5/21/2015	TW	49	40	33	28	43	33	14.7	36	33	33	30	7.27	29	16.1	12,658,833	28	24	9,259,488	14	7	7	2	3	y	
5/29/2015	TW	49	44	33	29	47	25	12.7	28	25	25	23	7.2	22	14	12,730,692	21	20.9	9,334,025	12	6	7	2	3	y	
6/5/2015	TW	49	27	33	28	30	9	8.08	13	10	10	8	7.31	7	17.4	12,802,871	7	22.8	9,403,263	14	7	7	2	3	y	
6/12/2015	TW	49	38	33	24	41	29	13.4	31	28	28	25	7.16	24	14.5	12,876,298	22	29.8	9,447,002	22	7	11	2	3	y	
6/19/2015	TW	49	43	33	19	45	25	12.1	27	24	24	21	7.38	20	13.3	12,934,161	19	26.1	9,509,220	18						

Buffalo Color GWTF Daily Maintenance & Repair Log

DATE	D1A GAC SERVICE	D1B GAC SERVICE	D2 GAC SERVICE	MMF SERVICE	D1A GAC FLUSH	D1B GAC FLUSH	D2 GAC FLUSH	MMF FLUSH	BF 1A CHANGE	BF 1B CHANGE	BF 2A CHANGE	BF 2B CHANGE	ADDITIONAL NOTES / NON ROUTINE REPAIR & MAINTENANCE
4/1/2015					1			1					
4/2/2015													
4/3/2015					1	1	1	1	1	1	1	1	
4/4/2015													
4/5/2015													
4/6/2015								1	1	1	1	1	
4/7/2015									1	1			Changed transducer #5
4/8/2015					1			1	1	1			
4/9/2015													
4/10/2015					1	1	1	1	1	1	1	1	
4/11/2015													
4/12/2015													
4/13/2015								1	1	1			
4/14/2015									1	1			
4/15/2015								1	1	1			
4/16/2015							1		1	1	1	1	
4/17/2015					1	1		1	1	1			
4/18/2015													
4/19/2015													
4/20/2015								1	1	1			
4/21/2015									1	1			
4/22/2015								1	1	1			
4/23/2015							1		1	1	1	1	
4/24/2015					1	1		1	1	1			
4/25/2015													
4/26/2015													
4/27/2015								1	1	1			
4/28/2015													
4/29/2015								1	1	1			Acid treat #5
4/30/2015								1	1	1	1	1	
5/1/2015					1			1	1	1			
5/2/2015													
5/3/2015													
5/4/2015								1	1	1	1		
5/5/2015									1				
5/6/2015								1		1			
5/7/2015							1		1		1	1	Changed pump #4 "A"
5/8/2015					1			1	1	1			
5/9/2015													
5/10/2015													
5/11/2015								1	1	1	1		Acid #4 "A"
5/12/2015									1	1	5	2	
5/13/2015									1	1	4	1	
5/14/2015							1				1	1	
5/15/2015								1	1	1			
5/16/2015													
5/17/2015													
5/18/2015					1			1	1	1	1		Acid #3 "A"
5/19/2015											3	1	
5/20/2015								1	1	1			
5/21/2015							1	1	1	1	1	1	
5/22/2015													
5/23/2015													
5/24/2015													
5/25/2015					1			1	1	1			Clean M M filter

Buffalo Color GWTF Daily Maintenance & Repair Log													
DATE	D1A GAC SERVICE	D1B GAC SERVICE	D2 GAC SERVICE	MMF SERVICE	D1A GAC FLUSH	D1B GAC FLUSH	D2 GAC FLUSH	MMF FLUSH	BF 1A CHANGE	BF 1B CHANGE	BF 2A CHANGE	BF 2B CHANGE	ADDITIONAL NOTES / NON ROUTINE REPAIR & MAINTENANCE
5/26/2015													
5/27/2015								1	1	1			
5/28/2015							1		1	1	1	1	Acid #5 "A"
5/29/2015					1			1	1	1			
5/30/2015													
5/31/2015													
6/1/2015								1	1	1			New motor #3 "D", run D wells
6/2/2015									1	1			Change pump #4 "A"
6/3/2015								1	1	1			
6/4/2015							1				1	1	
6/5/2015					1			1	1	1			
6/6/2015													
6/7/2015													
6/8/2015							1	1	1	1	1		
6/9/2015									1	1			
6/10/2015								1	1	1			
6/11/2015									1	1			New carbon Gac #2
6/12/2015					1		1	1	1	1	1		
6/13/2015													
6/14/2015													
6/15/2015								1	1	1			
6/16/2015									1				
6/17/2015								1	1	1			
6/18/2015					1		1	1	1	1	1	1	
6/19/2015													
6/20/2015													
6/21/2015													
6/22/2015								1	1	1			
6/23/2015									1	1	1		
6/24/2015								1	1	1			
6/25/2015	1												New carbon 1a (cyclesorb)
6/26/2015					1			1	3	3			
6/27/2015													
6/28/2015													
6/29/2015					1			1	2	2	1	1	Acid 4 "A"
6/30/2015									1	1			Change pump #4 "A"

October 31, 2015

Leslie Sedita
Industrial Waste Administrator
Buffalo Sewer Authority
90 West Ferry Street
Buffalo, New York, 14213

Subject: **South Buffalo Development Corporation, LLC**
Former Buffalo Color Corporation Site
Permit #14-06-BU109
OSC Project ID: 0913OMM

Dear Ms. Sedita:

On behalf of South Buffalo Development Corporation, LLC (SBD), Ontario Specialty Contracting, Inc. (OSC) is submitting the Discharge Monitoring Report for the Buffalo Color Remediation Site covering the period of July 2015 through September 2015. This Discharge Monitoring Report has been completed in accordance with the requirements of Permit #14-06BU109.

Included with the report are:

- Operation log sheets;
- A copy of the current BSA discharge permit;
- Schematic showing the location for monitoring and sampling;
- Summary of the discharge flow by month;
- Comparison of analytical data to permit limits; and
- Analytical laboratory results.

Please review the attached information and feel free to contact me if you have any questions.

Sincerely,

Andrew D. Madden
Project Manager - *Ontario Specialty Contracting, Inc.*

cc:

Richard Galloway	Honeywell
Eugene Melnyk	NYSDEC Region 9
John Yensan	South Buffalo Development, LLC
Daniel Forlastro	AMEC Environment & Infrastructure

Industrial Waste Section
Buffalo Sewer Authority Treatment Plant
90 West Ferry Street
Buffalo, New York, 14213

B.P.D.E.S. Permit No. #14-06-BU109
Former Buffalo Color Corporation Site
South Buffalo Development Corporation LLC (SBD)
Reporting Period: July 2015 through September 2015

The following is the discharge data associated with the operations of the former Buffalo Color Corporation Area A and D Groundwater Extraction System throughout the reporting period. A schematic representing the current locations for discharge sampling is provided as an attachment. The monthly flow data presented is based upon flow data from the Effluent No. 1 and Effluent No. 2 flow totalizers, which includes any flow from the Area D well pumping. All samples gathered were grab samples and analysis was provided by TestAmerica located in Amherst, NY. The sample event analytical results are attached.

Total Flow Data by Month:

July 2015	604,079 gallons
August 2015	454,073 gallons
September 2015	470,475 gallons
Total Quarterly Discharge	1,528,627 gallons

Estimated Area D contribution this period:
4,741 gallons

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including possibility of fine and imprisonment for knowing violations.

Andrew D. Madden
Project Manager

Ontario Specialty Contracting, Inc.

Attachments:
BSA Permit Analytical Summary Table, BSA Discharge Permit, Monitoring and Sampling Schematic, Laboratory Analytical Results, and Field Data Collection Sheets

BSA Permit Analytical Summary Table

Compliance Confirmation
Discharge Monitoring Report

BSA Permit No.	14-06-BU109	Effective June 1, 2014
Sample Date:	9/2/2015	Quarter: 3Q
Sample Location:	Onsite Pump Station to BSA	

Year: 2015
Month: SEP

Event Group: SUMP
Lab Job ID: J86582-1

BSA Permit Parameter		Input Analytical Results			Converted Analytical Results		BSA Daily Max Discharge Limit		Permit Compliance	MAID mg/L	Quantity mg/L	Permit Compliance
Chemical	CAS No. / Method ID	Quantity	Reporting Limit	Unit	Quantity	Unit	Quantity	Unit				
pH	PH	8.25	0.100	SU	8.25	SU	5.0 - 12.0	SU	Yes			
BOD5	BOD	2.90	2.0	mg/L	2.9	mg/L	250	mg/L	Yes			
Total Phenol	TOTPHEN	0.01	0.010	mg/L	0.001	lbs/day	1.67	lbs/day	Yes	20	0.010	Yes
Total Chromium	7440-47-3	0.00	0.0040	mg/L	0.0003	lbs/day	0.83	lbs/day	Yes	40	0.00	Yes
Total Copper	7440-50-8	0.00	0.010	mg/L	0.000	lbs/day	0.67	lbs/day	Yes	16	0.0018	Yes
Lead	7439-92-1	ND	0.0050	mg/L	ND	lbs/day	0.541	lbs/day	Yes	65	ND	Yes
Total Mercury	7439-97-6	ND	0.00020	mg/L	ND	lbs/day	0.00033	lbs/day	Yes	0.0008	ND	Yes
Total Nickel	7440-02-0	0.00	0.010	mg/L	0.0004	lbs/day	1.17	lbs/day	Yes	14	0.0027	Yes
Zinc	7440-66-6	0.01	0.010	mg/L	0.001	lbs/day	2.046	lbs/day	Yes	25	0.005	Yes
Amendable Cyanide	CAN	ND	0.010	mg/L	ND	lbs/day	2.59	lbs/day	Yes	6.2	ND	Yes
Total PCB	Sum Method_E608	ND	0.059	ug/L	ND	lbs/day	0.0001	lbs/day	Yes	0.002	ND	Yes
Aniline or Aniline Derivative*	62-53-3	12.0	1900	ug/L	0.0017	lbs/day	50	lbs/day	Yes			
Benzene	71-43-2	ND	25	ug/L	ND	lbs/day	0.059	lbs/day	Yes	0.142	ND	Yes
Chlorobenzene	108-90-7	1.9	25	ug/L	0.0003	lbs/day	0.129	lbs/day	Yes	0.31	0.00	Yes
1,2-Dichlorobenzene	95-50-1	ND	9.4	ug/L	ND	lbs/day	0.197	lbs/day	Yes	0.472	ND	Yes
Fluoranthene	206-44-0	ND	4.7	ug/L	ND	lbs/day	0.0417	lbs/day	Yes	0.1	ND	Yes
Acenaphthylene	208-96-8	ND	0.47	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Naphthalene	91-20-3	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Anthracene	120-12-7	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Fluorene	86-73-7	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Phenanthrene	85-01-8	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Max Individual Purgeables*	Max Method_E624	2	25	ug/L	0.002	mg/L	*	mg/L	Yes			
Total Suspended Solids	TSS	13.2	4.0	mg/L	13.2	mg/L	250	mg/L	Yes			
Total Phosphate**	7723-14-0	0.093	0.010	mg/L	0.093	mg/L	15.35	mg/L	Yes			
Total Flow (average)	N/A	11.67	-	gpm	16,798	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	22,666,837	7/1/2015
Final Reading	24,195,464	9/30/2015
Total Days in Period	91	
Total Flow for Period	**1,528,627**	gallons
Average Flow for Period	**11.67**	gpm

BSA Discharge Permit

BUFFALO SEWER AUTHORITY

ADMINISTRATIVE OFFICES
1038 CITY HALL
65 NIAGARA SQUARE
BUFFALO, NY 14202-3378
PHONE: (716) 851-4664
FAX: (716) 856-5810

WASTEWATER TREATMENT PLANT
FOOT OF WEST FERRY
90 WEST FERRY STREET
BUFFALO, NY 14213-1799
PHONE: (716) 883-1820

February 11, 2014

Andrew Madden
Manager
South Buffalo Development, LLC.
333 Ganson Street
Buffalo, New York 14203

Re: BPDES Permit No. 14-06-BU109

Dear Mr. Madden:

Enclosed is your BPDES Permit No. 14-06-BU109. This permit is issued by the BSA and allows your facility to discharge process wastes to the sanitary sewers.

This original permit must be maintained at your Buffalo facility and must be available for inspection at all times. It is your responsibility to assure continual compliance with the terms and conditions of this permit. Finally, you must apply for renewal at least six (6) months before this permit expires.

If you have any questions, please call Dennis W. Young at 851-4664, ext. 5256.

Very truly yours,

By:

Leslie Sedita
Industrial Waste Administrator
Industrial Waste Section

cc: M. Letina

I\WPD\JK\SBDLLC1406bu109permitltr

AUTHORIZATION TO DISCHARGE UNDER THE BUFFALO POLLUTANT DISCHARGE ELIMINATION SYSTEM

PERMIT NO. 14-06-BU109
EPA 40CFR 403

In accordance with the provisions of the Federal Water Pollution Control Act, as amended, and the Sewer Regulations of the Buffalo Sewer Authority, authorization is hereby granted to:

South Buffalo Development, LLC.

to discharge remediated wastewater from the site located at:

Areas A and D of the former Buffalo Color Corporation Site

1037 South Park Avenue, Buffalo, New York 14210

to the Buffalo Municipal Sewer System.

Issuance of this permit is based upon a permit application filed on **February 4, 2014** and analytical data. This permit is granted in accordance with discharge limitations, monitoring requirements and other conditions set forth in Parts I and II hereof.

Effective this June 1, 2014

To Expire May 31, 2017

General Manager

Signed this 16th **day of** February **, 2014**

PART I: SPECIFIC CONDITIONS

A. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

During the period beginning the effective date of this Permit and lasting until the expiration date, discharge from the permitted facility outfalls (see attached maps) shall be limited and monitored **Quarterly** by the permittee as specified below:

Sample		Discharge Limitations		Sampling Requirements	
Point	**Parameter**	**Daily Max**	**MAID*** (mg/L)	**Type**	**Frequency**
001	pH[1]	5.0 - 12.0 SU		Probe	**Quarterly**
	Total Flow	50,000 gals		Flow Meter[2]	**Continuous**
	BOD_5	250 mg/L [3]		Composite [4]	**Quarterly**
	Total Suspended Solids	250 mg/L [3]		Composite	**Quarterly**
	Total Phosphate	15.35 mg/L[3]		Composite	**Quarterly**
	Total Phenol[5]	1.67 lbs	20.0	Composite	**Quarterly**
	Amenable Cyanide	2.59 lbs	6.2	Grab [7]	**Quarterly**
	Total Mercury	0.00033 lbs	0.0008	Composite	**Quarterly**
	Total Nickel	1.17 lbs	14.0	Composite	**Quarterly**
	Total Copper	0.67 lbs	16.0	Composite	**Quarterly**
	Total Chromium	0.83 lbs	40.0	Composite	**Quarterly**
	Lead	0.541 lbs	65.0	Composite	**Quarterly**
	Zinc	2.046 lbs	25.0	Composite	**Quarterly**
	Purgeables-EPA Test Methods 624	[6]		Grab[7]	**Quarterly**
	Base/Neutrals & Acid Extractable-EPA Tests Method 625	[8]		Composite	**Quarterly**
	Total PCB's	0.000 lbs	0.002	Composite	**Quarterly**
	Aniline	50.0 lbs	0.00	Composite	**Quarterly**
	Benzene	0.059 lbs	0.142 mg/L	Composite	**Quarterly**
	Chlorobenzene	0.129 lbs	0.310 mg/L	Composite	**Quarterly**
	1, 2-Dichlorbenzene	0.197 lbs.	0.472 mg/L	Composite	**Quarterly**
	Fluoranthene	0.0417 lbs.	0.100 mg/L	Composite	**Quarterly**
	Acenaphtylene	0.131 lbs.	0.314 mg/L	Composite	**Quarterly**
	Naphthalene	0.131 lbs.	0.314 mg/L	Composite	**Quarterly**
	Anthracene	0.131 lbs.	0.314 mg/L	Composite	**Quarterly**

Sample Point	Parameter	Discharge Limitations		Sampling Requirements	
		Daily Max	**Maid***	**Type**	**Frequency**
	Fluorene	0.131 lbs.	0.314 mg/L	Composite	**Quarterly**
	Phenanthrene	0.131 lbs.	0.314 mg/L	Composite	**Quarterly**

*M.A.I.D. – Maximum Allowable Instantaneous Discharge – Slug Limit.
SEE PAGE FOUR (4) FOR EXPLANATION OF SPECIFIC REQUIREMENTS.

PART I: SPECIFIC CONDITIONS

B. DISCHARGE MONITORING REPORTING REQUIREMENTS

During the period beginning the effective date of this permit and lasting until the expiration date, discharge monitoring results shall be summarized and reported quarterly by the permittee on the days specified below:

Sample Point	Parameter	Reporting Requirements	
		Initial Report	**Subsequent Reports**
001	All analytes	July 31, 2011	Every July 31, October 31, January 31, April 30**

** Each reporting dated is for samples collected during the previous quarter.

PART I: SPECIFIC CONDITIONS

C. SPECIAL REQUIREMENTS

(1) The pH meter must be calibrated and maintained in accordance with the manufacturer's specifications. The calibrations and the person(s) responsible for it must be recorded in a bound logbook. This logbook must be available for BSA inspection at all times.

(2) All flow meters must be calibrated and certified by a certified manufacturer's representative at least once per year. This report must be submitted with the annual report. All flow meters must be serviced and maintained in accordance with the manufacturer's specifications. The BSA must be notified of any malfunctions which last for more that 24 hours within three (3) days of the malfunction. If a flow meter, especially at SP001, remains out of service for more than five (5) consecutive days, the permittee must install a temporary meter until such time as the defective meter is repaired or replaced. The BSA at its option, may require a written report on any malfunctions.

(3) Surchargeable limit only.

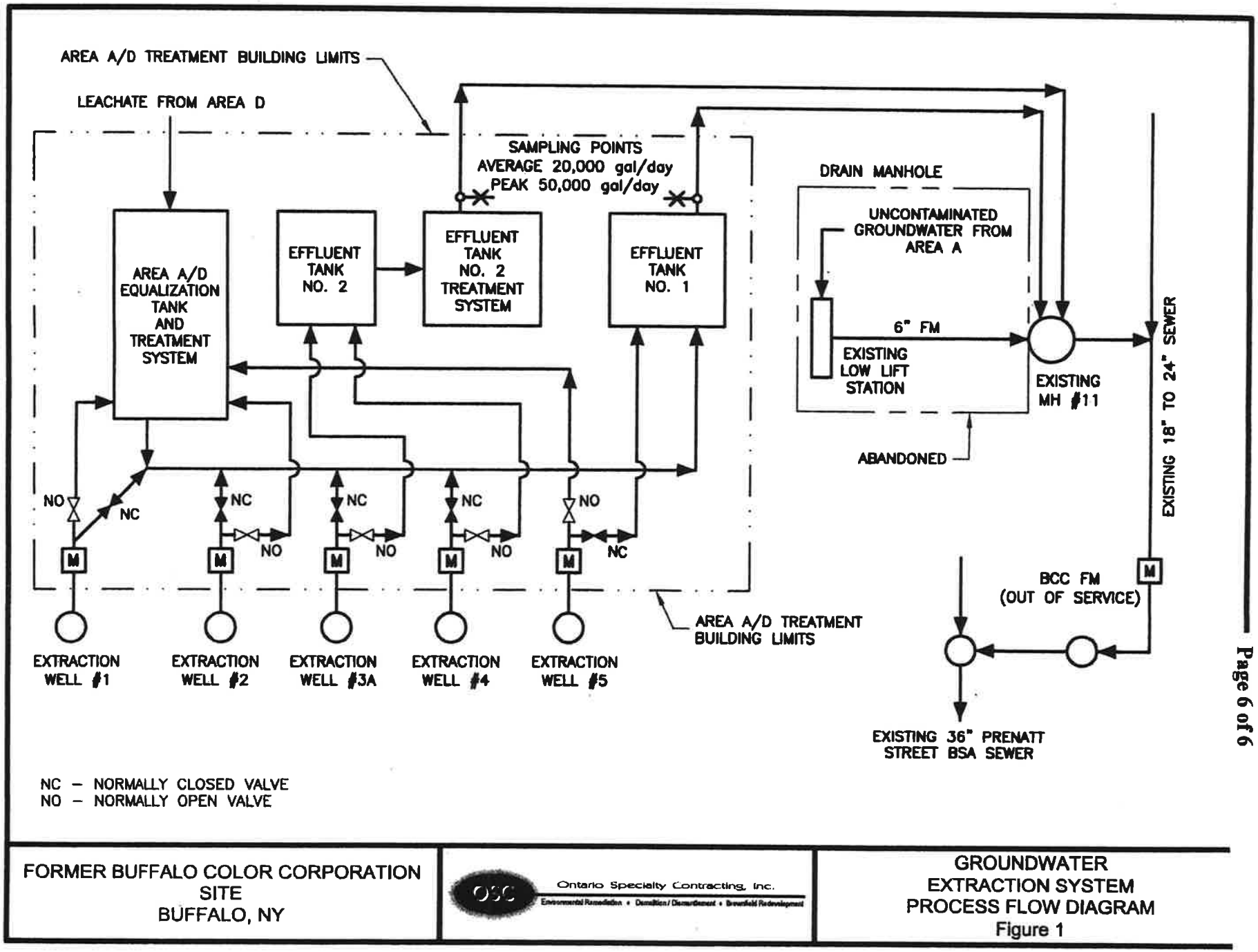
(4) Composite samples may be flow proportioned.

(5) EPA Test Method 604.

(6) The permittee must report any compound whose concentration is greater than 0.01 mg/L. The permittee is not authorized to discharge any of the parameters evaluated by these test procedures which may cause or contribute to a violation of water quality standards, worker health or safety limits or harm the sewerage system. Any parameter detected may at the discretion of the Buffalo Sewer Authority, be specifically limited and incorporated into this permit.

(7) Four grab samples must be properly taken and preserved over an equally spaced time period during a normal discharge day. The four grab samples must be flow proportionally composited at a New York State Department of Health certified lab.

(8) All samples collected for the base neutral and acid extractable EPA analytical test procedures must go through a special cleanup to prevent aniline and aniline derivative interference of the analytical method. The permittee must report any aniline and aniline derivative whose concentration is greater that 0.01 mg/L.



FORMER BUFFALO COLOR CORPORATION SITE BUFFALO, NY	OSC Ontario Specialty Contracting, Inc. Environmental Remediation • Demolition / Dismantlement • Brownfield Redevelopment	GROUNDWATER EXTRACTION SYSTEM PROCESS FLOW DIAGRAM Figure 1

BUFFALO POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

PART II: GENERAL CONDITIONS

A. MONITORING AND REPORTING

1. Local Limits

Except as otherwise specified in this permit, the permit holder shall comply with all specific prohibitions, limits on pollutants or pollutant parameters set forth in the Buffalo Sewer Authority Sewer Use Regulations, as amended from time to time, and such prohibitions, limits and parameters shall be deemed pretreatment standards for purposes for the Clean Water Act.

2. Definitions

Definitions of terms contained in this permit are as defined in the Buffalo Sewer Authority Sewer Use Regulations.

3. Discharge Sampling Analysis

All Wastewater discharge samples and analyses and flow measurements shall be representative of the volume and character of the monitored discharge. Methods employed for flow measurements and sample collections and analyses shall conform to the Buffalo Sewer Authority "Sampling Measurement and Analytical Guidelines Sheet".

4. Recording of Results

For each measurement or sample taken pursuant to the requirements of the permit, the permittee shall record the information as required in the "Sampling Measurement and Analytical Guidelines Sheet".

5. Additional Monitoring by Permittee

If the permittee monitors any pollutants at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified in 40 CFR Part 136 the results of such monitoring shall be included in the calculation and reporting of values required under Part I, B. Such increased frequency shall also be indicated.

6. Reporting

All reports prepared in accordance with this Permit shall be submitted to:

Industrial Waste Section
Buffalo Sewer Authority Treatment Plant
90 West Ferry Street
Buffalo, New York 14213

All self-monitoring reports shall be prepared in accordance with the BSA "Sampling Measurement and Analytical Guidelines Sheet". These reporting requirements shall not relieve the permittee of any other reports, which may be required by the N.Y.S.D.E.C. or the U.S.E.P.A.

7. Certification Statement

All self-monitoring reports shall include the following certification statement, signed by the preparer of the report:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

B. PERMITTEE REQUIREMENTS

1. Change in Discharge [revised 08/2013]

All discharges authorized herein shall be consistent with the terms and conditions of this permit and with the information contained in the BPDES permit application on which basis this permit is granted. In the event of any facility expansions, production increases, process modifications or the installation, modification or repair of any pretreatment equipment which may result in new, different or increased discharges of pollutants, a new BPDES Permit application must be submitted prior to any change. Following receipt of an amended application, the BSA may modify this permit to specify and limit any pollutants not previously limited. In the event that the proposed change will be covered under an applicable Categorical Standard, a Baseline Monitoring Report must be submitted at least ninety (90) days prior to any discharge. A Baseline Monitoring Report shall be prepared in accordance with the BSA "Sampling Measurement and Analytical Guidelines Sheet".

2. Records Retention

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed, calibration and maintenance of instrumentation, and recordings from continuous monitoring instrumentation shall be retained at this facility for a minimum of three (3) years, or longer if requested by the General Manager.

3. Spill Prevention and Control Plan [added 08/2013]

The permittee shall have a plan to prevent and control spills into the sewer system. The plan shall be prepared in accordance with the BSA "Sampling Measurement and Analytical Guidelines Sheet"

4. Notification of Slug, Accidental Discharge or Spill

In the event that a slug, accidental discharge or any spill occurs at the facility for which this permit is issued, it is the responsibility of the permittee to immediately notify the B.S.A. Treatment Plant at 883-1820 of the quantity and character of such discharge. During normal business hours, Monday – Friday, 7:30 AM – 3:00 PM call 851-4661, ext. 5374. After 3:00 PM call ext. 851-4664, ext. 600. If requested by the B.S.A., Within five (5) days following all such discharges, the permittee shall submit a report describing the character and duration of the discharge, the cause of the discharge, and measures taken or that will be taken to prevent a recurrence of such discharge.

5. Noncompliance Notification [Revised 08/2013]

If, for any reason, the permittee does not comply with or will be unable to comply with any discharge limitation specified in this permit, the permittee or their assigns must verbally notify the Industrial Waste Section at 883-1820 851-4664, ext. 5374 within twenty-four (24) hours of becoming aware of the violation. The permittee shall also provide the Industrial Waste Section with the following information, in writing, within five (5) days of becoming aware of such condition:

a. a description of the discharge and cause of noncompliance and;

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

Additionally, the permittee shall repeat the sampling and analysis and submit these results of the report analysis to the Industrial Waste Section within 30 days after

becoming aware of the violation.

6. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the Buffalo Sewerage System resulting from noncompliance with any discharge limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

7. Waste Residuals

Solids, sludges, filter backwash or other pollutants removed in the course of treatment or control of wastewaters and/or the treatment of intake waters, shall be disposed of in a manner such as to prevent any pollutant from such materials from entering the Buffalo Sewer System.

8. Power Failures

In order to maintain compliance with the discharge limitations and prohibitions of this permit, the permittee shall provide an alternative power source sufficient to operate the wastewater control facilities; or, if such alternative power source is not provided the permittee shall halt, reduce or otherwise control production and/or controlled discharges upon the loss of power to the wastewater control facilities.

9. Treatment Upsets

a. Any industrial user which experiences an upset in operations that places it in a temporary state of noncompliance, which is not the result of operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation, shall inform the Industrial Waste Section immediately upon becoming aware of the upset. Where such information is given verbally, a written report shall be filed by the user within five (5) days. The report shall contain:

(i) A description of the upset, its cause(s) and impact on the discharger's compliance status;

(ii) The duration of noncompliance, including exact dates and times of noncompliance, and if the non-compliance is continuing, the time by which compliance is reasonably expected to be restored;

(iii) All steps taken or planned to reduce, eliminate, and prevent recurrence of such an upset.

b. An industrial user which complies with the notification provisions of this Section in a timely manner shall have an affirmative defense to any enforcement action brought by the Industrial Waste Section for any noncompliance of the limits in this permit, which arises out of violations attributable to and alleged to have occurred during the period of the documented and verified upset.

10. Treatment Bypasses

a. A bypass of the treatment system is prohibited unless the following conditions are met:

(i) The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; or

(ii) There was no feasible alternative to the bypass, including the use of auxiliary treatment or retention of the wastewater; and

(iii) The industrial user properly notified the Industrial Waste Section as described in paragraph b. below.

b. Industrial users must provide immediate notice to the Industrial Waste Section upon discovery of an unanticipated bypass. If necessary, the Industrial Waste Section may require the industrial user to submit a written report explaining the cause(s), nature, and duration of the bypass, and the steps being taken to prevent it's recurrence.

c. An industrial user may allow a bypass to occur which does not cause pretreatment standards or requirements to be violated, but only if it is for essential maintenance to ensure efficient operation of the treatment system. Industrial users anticipating a bypass must submit notice to the Industrial Waste Section at least ten (10) days in advance. The Industrial Waste Section may only approve the anticipated bypass if the circumstances satisfy those set forth in paragraph a. above.

C. PERMITTEE RESPONSIBILITIES

1. Permit Availability

The originally signed permit must be available upon request at all times for review at the address stated on the first page of this permit.

2. Inspections

The permittee shall allow the General Manager of the Buffalo Sewer Authority

and/or his authorized representatives, upon the presentation of credentials and during normal working hours or at any other reasonable times, to have access to and copy any records required in this permit; and to sample any discharge of pollutants.

3. Transfer of Ownership or Control

In the event of any change in control or ownership of facilities for which this permit has been issued the permit shall become null and void. The succeeding owner shall submit a completed Buffalo Sewer Authority permit application prior to discharge to the sewer system.

D. PERMITTEE LIABILITIES

1. Permit Modification

After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to the following:

a. Violation of any terms or conditions of this permit,

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts,

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

2. Imminent Danger

In the event there exists an imminent danger to health or property, the permitter reserves the right to take immediate action to halt the permitted discharge to the sewerage works.

3. Civil and Criminal Liability

Nothing in this permit shall relieve the permittee from any requirements, liabilities, or penalties under provisions of the "Sewer Regulations of the Buffalo Sewer Authority" or any Federal, State and/or local laws or regulations.

4. Penalties for Violations of Permit Conditions

The "Sewer Regulations of the Buffalo Sewer Authority" and the "Sewer Regulations for Erie County Sewer Districts" provides that any person who violates a B.P.D.E.S. permit condition is liable to the Authority for a civil penalty of up to $10,000.00 per day for each violation. Any person who willfully or negligently violates permit

conditions will be referred to the New York State Attorney General.

E. NATIONAL PRETREATMENT STANDARDS

If a pretreatment standard or prohibition (including any Schedule of Compliance specified in such pretreatment standard or prohibition) is established under Section 307 (b) of the Act for a pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with such pretreatment standard or prohibition.

F. PLANT CLOSURE

In the event of plant closure, the permittee is required to notify the Industrial Waste Section in writing as soon as an anticipated closure date is determined, but in no case later than five days of the actual closure.

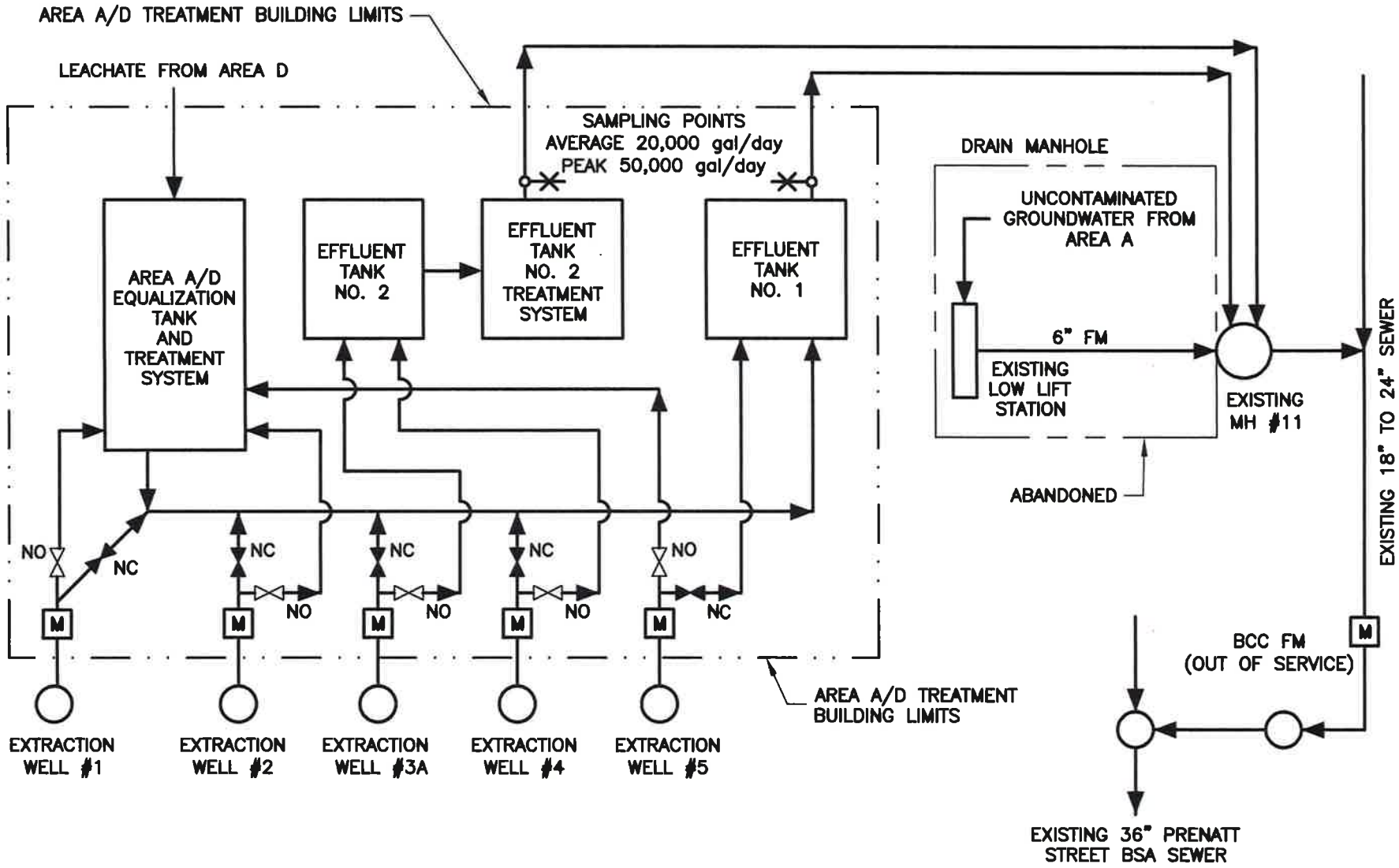
G. CONFIDENTIALITY

Except for data determined to be confidential under Section 308 of the Act, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Buffalo Sewer Authority. As required by the Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the Act.

H. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

Monitoring and Sampling Schematics



NC – NORMALLY CLOSED VALVE
NO – NORMALLY OPEN VALVE

FORMER BUFFALO COLOR CORPORATION SITE BUFFALO, NY	Ontario Specialty Contracting, Inc. Environmental Remediation • Demolition / Dismantlement • Brownfield Redevelopment	GROUNDWATER EXTRACTION SYSTEM PROCESS FLOW DIAGRAM Figure 1

Laboratory Analytical Results

Detection Summary

Client: Ontario Specialty Contracting, Inc.
Project/Site: 37745-Buffalo Color- Quarterly BSA SUMP

TestAmerica Job ID: 480-86582-1

Client Sample ID: BCC BSA SUMP_0915

Lab Sample ID: 480-86582-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Chlorobenzene	1.9	J	5.0	0.48	ug/L	1		624	Total/NA
Aniline	12		9.5	1.4	ug/L	1		625	Total/NA
Di-n-butyl phthalate	14		4.8	1.5	ug/L	1		625	Total/NA
Nitrobenzene	3.5	J	4.8	0.77	ug/L	1		625	Total/NA
Chromium	0.0023	J	0.0040	0.0010	mg/L	1		200.7 Rev 4.4	Total/NA
Copper	0.0018	J	0.010	0.0016	mg/L	1		200.7 Rev 4.4	Total/NA
Nickel	0.0027	J	0.010	0.0013	mg/L	1		200.7 Rev 4.4	Total/NA
Zinc	0.0051	J B	0.010	0.0015	mg/L	1		200.7 Rev 4.4	Total/NA
Phenolics, Total Recoverable	0.010		0.010	0.0050	mg/L	1		420.1	Total/NA
Cyanide, Amenable	0.060		0.010	0.0050	mg/L	1		SM 4500 CN G	Total/NA
Phosphorus	0.093		0.010	0.0050	mg/L as P	1		SM 4500 P E	Total/NA
Biochemical Oxygen Demand	2.9	b	2.0	2.0	mg/L	1		SM 5210B	Total/NA

Analyte	Result	Qualifier	RL	RL	Unit	Dil Fac	D	Method	Prep Type
Total Suspended Solids	13.2		4.0	4.0	mg/L	1		SM 2540D	Total/NA
pH	8.25	HF	0.100	0.100	SU	1		SM 4500 H+ B	Total/NA

Client Sample ID: TRIP BLANK

Lab Sample ID: 480-86582-2

No Detections.

This Detection Summary does not include radiochemical test results.

Field Data Collection Sheets

Buffalo Color GWTF Weekly Process Assessment

		Bag Filter F-1A/1B		Bag Filter F-2A/2B		Multi-Media Filter F-30		LGAC CA-40 and CA-41						Effluent Tank No. 1 T-28				Effluent Tank No. 2 T-27			Discharge Lines To BSA Sump					
Date	Associate	Influent Pressure PI-1A	Effluent Pressure PI-1B	Influent Pressure PI-107A	Effluent Pressure PI-107B	Influent Pressure PI-30A	Effluent Pressure PI-30B	Flow Rate FE-60	Lead Influent Pressure PI-40A	Lead Effluent Pressure PI-40B	Lag Influent Pressure PI-41A	Lag Effluent Pressure PI-41B	PH Meter	Pressure PI-106A/B	Flow Rate FE-106	Totalizer FE-106	Pressure PI-106C	Flow Rate FE-107	Totalizer FE-107	Pressure PI-107C	Leak Detection Vault No. 1 Pressure PI-106D	Leak Detection Vault No. 1 Pressure PI-107D	Leak Detection Vault No. 3 Pressure PI-106E	Leak Detection Vault No. 3 Pressure PI-107E	Containment Line Pressure Gauge Checks	Comments
7/10/2015	TW	48	48	33	23	51	39	15.4	38	37	37	36	7.28		16.7	13,120,726	32	27.8	9,713,703	20						
7/17/2015	TW	49	19	32	22	22	5	5.74	6	4	5	4	7.34		6.3	13,185,968	6	30.4	9,782,283	24						Readings taken before filter's changed
7/23/2015	TW	50	44	33	21	48	20	10.6	21	18	18	18	7.33	27	11.6	13,251,882	28	26	9,852,230	19	6	8	2	3		
7/31/2015	TW	49	49	33	25	51	37	15	38	35	36	34	7.02	28	15.9	13,323,861	30	29	9,927,598	23	7	8	2	3		
8/10/2015	TW	49	45	33	24	47	35	14.2	35	32	33	31	7.37		15.9	13,406,287	28	27.6	10,039,742	21	7	9	3	3		
8/14/2015	TW	48	45	33	21	47	35	14.5	36	34	34	33	7.31		16	13,439,427	29	28	10,067,858	18						
8/21/2015	TW	48	47	33	15	50	36	14.3	36	34	35	33	7.4	29	16	13,486,828	29	21.2	10,097,436	13						
8/28/2015	TW	48	48	33	25	50	37	14.5	37	35	36	33	7.1	30	14.8	13,552,389	30	26.8	10,132,382	20	8	8	3	3		
9/11/2015	TW	48	48	33	21	51	39	14.3	38	37	37	35	7.46	30	14.8	13,656,535	32	26.4	10,168,998	18	7	8	3	3		
9/18/2015	TW	49	46	33	23	50	37	13.3	37	33	34	32	7.76	28	14.7	13,729,060	29	29.7	10,233,607	25	7	11	3	3		

Buffalo Color GWTF Daily Maintenance & Repair Log

DATE	D1A GAC SERVICE	D1B GAC SERVICE	D2 GAC SERVICE	MMF SERVICE	D1A GAC FLUSH	D1B GAC FLUSH	D2 GAC FLUSH	MMF FLUSH	BF 1A CHANGE	BF 1B CHANGE	BF 2A CHANGE	BF 2B CHANGE	ADDITIONAL NOTES / NON ROUTINE REPAIR & MAINTENANCE
7/1/2015									1	1	1		
7/2/2015		1					1	1	1	1	1	1	New Gac Vessal-carbon
7/3/2015													
7/4/2015													
7/5/2015													
7/6/2015								1	1	1			
7/7/2015					1	1	1	1	1	1	1	1	
7/8/2015									1	1			
7/9/2015													
7/10/2015					1	1		1	1	1	1	1	
7/11/2015													
7/12/2015													
7/13/2015								1	2	2			
7/14/2015									1	1			
7/15/2015							1				1	1	
7/16/2015								1	1	1			
7/17/2015								1	1	1	1	1	
7/18/2015													
7/19/2015													
7/20/2015								1	2	2			
7/21/2015								1	1	1	4	1	Acid 4 & 5 "A"
7/22/2015								1	1	1			
7/23/2015							1	1	1		1		
7/24/2015					1	1		1	1	1			
7/25/2015													
7/26/2015													
7/27/2015								1	1	1			Clean M M filter
7/28/2015								1	1		1		
7/29/2015								1	1	1			
7/30/2015							1	1		1	1	1	
7/31/2015					1	1			1	1	1		
8/1/2015													
8/2/2015													
8/3/2015								1	1	1			
8/4/2015								1	1		1		"A"-2&4 cleaned, develop w/Jetter
8/5/2015								1		1			
8/6/2015							2	1	1		1	1	
8/7/2015								1	1	1			
8/8/2015													
8/9/2015													
8/10/2015								1	1	1			
8/11/2015								1	1	1			
8/12/2015								1	1	1			
8/13/2015											1	1	
8/14/2015					1	1	1	1	1	1			
8/15/2015													
8/16/2015													
8/17/2015													
8/18/2015								1	2	1			
8/19/2015								1	1	1			
8/20/2015							1	1	1	1			
8/21/2015					1	1	1	1	1	1	1		Change pump #4 "A"
8/22/2015													
8/23/2015													

Buffalo Color GWTF Daily Maintenance & Repair Log

DATE	D1A GAC SERVICE	D1B GAC SERVICE	D2 GAC SERVICE	MMF SERVICE	D1A GAC FLUSH	D1B GAC FLUSH	D2 GAC FLUSH	MMF FLUSH	BF 1A CHANGE	BF 1B CHANGE	BF 2A CHANGE	BF 2B CHANGE	ADDITIONAL NOTES / NON ROUTINE REPAIR & MAINTENANCE
8/24/2015								1	1	1			
8/25/2015								1	1	1			
8/26/2015							1	1	1		1	1	
8/27/2015								1	1				
8/28/2015					1	1		1	1	1			
8/29/2015													
8/30/2015													
8/31/2015					1	1	1	1	1	1	1		
9/1/2015								1	2	1			
9/2/2015								1		1			
9/3/2015					1			1	1	1			
9/4/2015													
9/5/2015													
9/6/2015													
9/7/2015													
9/8/2015								1	2	1			
9/9/2015								1	1	1			
9/10/2015							1	1	1		1	1	Acid #5 line: Change pump #3a
9/11/2015					1	1		1	1	1			
9/12/2015													
9/13/2015													
9/14/2015								1	1	1			Acid line #4a
9/15/2015								1	1	1	2	1	
9/16/2015								1		1	2		
9/17/2015							1	1	1	1	1	1	
9/18/2015					1			1	1	1			
9/19/2015													
9/20/2015													
9/21/2015								1	1	1	1		
9/22/2015								1	1	1			
9/23/2015								1	1	1			
9/24/2015								1	1	1			
9/25/2015					1	1		1	1	1			
9/26/2015													
9/27/2015													
9/28/2015								1	2	2			#4 New cable: #3 New pump
9/29/2015								1		1			
9/30/2015								1	1	1			

January 31, 2016

Leslie Sedita
Industrial Waste Administrator
Buffalo Sewer Authority
90 West Ferry Street
Buffalo, New York, 14213

Subject: **South Buffalo Development Corporation, LLC**
Former Buffalo Color Corporation Site
Permit #14-06-BU109
OSC Project ID: 0913OMM

Dear Ms. Sedita:

On behalf of South Buffalo Development Corporation, LLC (SBD), Ontario Specialty Contracting, Inc. (OSC) is submitting the Discharge Monitoring Report for the Buffalo Color Remediation Site covering the period of October 2015 through December 2015. This Discharge Monitoring Report has been completed in accordance with the requirements of Permit #14-06BU109.

Included with the report are:

- Operation log sheets;
- A copy of the current BSA discharge permit;
- Schematic showing the location for monitoring and sampling;
- Summary of the discharge flow by month;
- Comparison of analytical data to permit limits; and
- Analytical laboratory results.

Please review the attached information and feel free to contact me if you have any questions.

Sincerely,

Andrew D. Madden
Project Manager - *Ontario Specialty Contracting, Inc.*

cc:	Richard Galloway	Honeywell
	Eugene Melnyk	NYSDEC Region 9
	John Yensan	South Buffalo Development, LLC
	Daniel Forlastro	AMEC Environment & Infrastructure

Industrial Waste Section
Buffalo Sewer Authority Treatment Plant
90 West Ferry Street
Buffalo, New York, 14213

B.P.D.E.S. Permit No. #14-06-BU109
Former Buffalo Color Corporation Site
South Buffalo Development Corporation LLC (SBD)
Reporting Period: October 2015 through December 2015

The following is the discharge data associated with the operations of the former Buffalo Color Corporation Area A and D Groundwater Extraction System throughout the reporting period. A schematic representing the current locations for discharge sampling is provided as an attachment. The monthly flow data presented is based upon flow data from the Effluent No. 1 and Effluent No. 2 flow totalizers, which includes any flow from the Area D well pumping. All samples gathered were grab samples and analysis was provided by TestAmerica located in Amherst, NY. The sample event analytical results are attached.

Total Flow Data by Month:

October 2015	510,081 gallons
November 2015	510,602 gallons
December 2015	468,332 gallons

Total Quarterly Discharge 1,489,015 gallons

Estimated Area D contribution this period:
5,409 gallons

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including possibility of fine and imprisonment for knowing violations.

Andrew D. Madden
Project Manager

Ontario Specialty Contracting, Inc.

Attachments:
BSA Permit Analytical Summary Table, BSA Discharge Permit, Monitoring and Sampling Schematic, Laboratory Analytical Results, and Field Data Collection Sheets

BSA Permit Analytical Summary Table

Compliance Confirmation
Discharge Monitoring Report

BSA Permit No.	14-06-BU109	Effective June 1, 2014	
Sample Date:	12/3/2015	Quarter:	4Q
Sample Location:	Onsite Pump Station to BSA		

Year: 2015
Month: DEC

Event Group: SUMP
Lab Job ID: J92069-1

BSA Permit Parameter		Input Analytical Results			Converted Analytical Results		BSA Daily Max Discharge Limit		Permit Compliance	MAID mg/L	Quantity mg/L	Permit Compliance
Chemical	CAS No. / Method ID	Quantity	Reporting Limit	Unit	Quantity	Unit	Quantity	Unit				
pH	PH	8.63	0.100	SU	8.63	SU	5.0 - 12.0	SU	Yes			
BOD5	BOD	ND	2.0	mg/L	ND	mg/L	250	mg/L	Yes			
Total Phenol	TOTPHEN	0.01	0.010	mg/L	0.002	lbs/day	1.67	lbs/day	Yes	20	0.014	Yes
Total Chromium	7440-47-3	0.00	0.0040	mg/L	0.0004	lbs/day	0.83	lbs/day	Yes	40	0.00	Yes
Total Copper	7440-50-8	0.01	0.010	mg/L	0.001	lbs/day	0.67	lbs/day	Yes	16	0.0064	Yes
Lead	7439-92-1	0.00	0.0050	mg/L	0.0006	lbs/day	0.541	lbs/day	Yes	65	0.0042	Yes
Total Mercury	7439-97-6	ND	0.00020	mg/L	ND	lbs/day	0.00033	lbs/day	Yes	0.0008	ND	Yes
Total Nickel	7440-02-0	ND	0.010	mg/L	ND	lbs/day	1.17	lbs/day	Yes	14	ND	Yes
Zinc	7440-66-6	0.01	0.010	mg/L	0.001	lbs/day	2.046	lbs/day	Yes	25	0.006	Yes
Amendable Cyanide	CAN	ND	0.010	mg/L	ND	lbs/day	2.59	lbs/day	Yes	6.2	ND	Yes
Total PCB	Sum Method_E608	ND	0.059	ug/L	ND	lbs/day	0.0001	lbs/day	Yes	0.002	ND	Yes
Aniline or Aniline Derivative*	62-53-3	4.6	1900	ug/L	0.0006	lbs/day	50	lbs/day	Yes			
Benzene	71-43-2	4.7	25	ug/L	0.0006	lbs/day	0.059	lbs/day	Yes	0.142	0.005	Yes
Chlorobenzene	108-90-7	14.0	25	ug/L	0.0019	lbs/day	0.129	lbs/day	Yes	0.31	0.01	Yes
1,2-Dichlorobenzene	95-50-1	ND	9.4	ug/L	ND	lbs/day	0.197	lbs/day	Yes	0.472	ND	Yes
Fluoranthene	206-44-0	ND	4.7	ug/L	ND	lbs/day	0.0417	lbs/day	Yes	0.1	ND	Yes
Acenaphthylene	208-96-8	ND	0.47	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Naphthalene	91-20-3	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Anthracene	120-12-7	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Fluorene	86-73-7	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Phenanthrene	85-01-8	ND	4.7	ug/L	ND	lbs/day	0.131	lbs/day	Yes	0.314	ND	Yes
Max Individual Purgeables*	Max Method_E624	14	25	ug/L	0.014	mg/L	*	mg/L	Yes			
Total Suspended Solids	TSS	26.4	4.0	mg/L	26.4	mg/L	250	mg/L	Yes			
Total Phosphate**	7723-14-0	0.400	0.010	mg/L	0.400	mg/L	15.35	mg/L	Yes			
Total Flow (average)	N/A	11.36	-	gpm	16,363	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	24,195,464	10/1/2015
Final Reading	25,684,478	12/31/2015
Total Days in Period	91	
Total Flow for Period	**1,489,015**	gallons
Average Flow for Period	**11.36**	gpm

BSA Discharge Permit

BUFFALO SEWER AUTHORITY

ADMINISTRATIVE OFFICES
1038 CITY HALL
65 NIAGARA SQUARE
BUFFALO, NY 14202-3378
PHONE: (716) 851-4664
FAX: (716) 856-5810

WASTEWATER TREATMENT PLANT
FOOT OF WEST FERRY
90 WEST FERRY STREET
BUFFALO, NY 14213-1799
PHONE: (716) 883-1820

February 11, 2014

Andrew Madden
Manager
South Buffalo Development, LLC.
333 Ganson Street
Buffalo, New York 14203

Re: BPDES Permit No. 14-06-BU109

Dear Mr. Madden:

Enclosed is your BPDES Permit No. 14-06-BU109. This permit is issued by the BSA and allows your facility to discharge process wastes to the sanitary sewers.

This original permit must be maintained at your Buffalo facility and must be available for inspection at all times. It is your responsibility to assure continual compliance with the terms and conditions of this permit. Finally, you must apply for renewal at least six (6) months before this permit expires.

If you have any questions, please call Dennis W. Young at 851-4664, ext. 5256.

Very truly yours,

By:

Leslie Sedita
Industrial Waste Administrator
Industrial Waste Section

cc: M. Letina

I\WPDUK\SBDLLC1406bu109permitltr

AUTHORIZATION TO DISCHARGE UNDER THE BUFFALO POLLUTANT DISCHARGE ELIMINATION SYSTEM

PERMIT NO. 14-06-BU109
EPA 40CFR 403

In accordance with the provisions of the Federal Water Pollution Control Act, as amended, and the Sewer Regulations of the Buffalo Sewer Authority, authorization is hereby granted to:

South Buffalo Development, LLC.

to discharge remediated wastewater from the site located at:

Areas A and D of the former Buffalo Color Corporation Site

1037 South Park Avenue, Buffalo, New York 14210

to the Buffalo Municipal Sewer System.

Issuance of this permit is based upon a permit application filed on **February 4, 2014** and analytical data. This permit is granted in accordance with discharge limitations, monitoring requirements and other conditions set forth in Parts I and II hereof.

Effective this June 1, 2014

To Expire May 31, 2017

General Manager

Signed this 16th **day of** February **, 2014**

PART I: SPECIFIC CONDITIONS

A. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

During the period beginning the effective date of this Permit and lasting until the expiration date, discharge from the permitted facility outfalls (see attached maps) shall be limited and monitored **Quarterly** by the permittee as specified below:

Sample		Discharge Limitations		Sampling Requirements	
Point	**Parameter**	**Daily Max**	**MAID*** (mg/L)	**Type**	**Frequency**
001	pH[1]	5.0 - 12.0 SU		Probe	**Quarterly**
	Total Flow	50,000 gals		Flow Meter[2]	**Continuous**
	BOD_5	250 mg/L [3]		Composite [4]	**Quarterly**
	Total Suspended Solids	250 mg/L [3]		Composite	**Quarterly**
	Total Phosphate	15.35 mg/L[3]		Composite	**Quarterly**
	Total Phenol[5]	1.67 lbs	20.0	Composite	**Quarterly**
	Amenable Cyanide	2.59 lbs	6.2	Grab [7]	**Quarterly**
	Total Mercury	0.00033 lbs	0.0008	Composite	**Quarterly**
	Total Nickel	1.17 lbs	14.0	Composite	**Quarterly**
	Total Copper	0.67 lbs	16.0	Composite	**Quarterly**
	Total Chromium	0.83 lbs	40.0	Composite	**Quarterly**
	Lead	0.541 lbs	65.0	Composite	**Quarterly**
	Zinc	2.046 lbs	25.0	Composite	**Quarterly**
	Purgeables-EPA Test Methods 624	[6]		Grab[7]	**Quarterly**
	Base/Neutrals & Acid Extractable-EPA Tests Method 625	[8]		Composite	**Quarterly**
	Total PCB's	0.000 lbs	0.002	Composite	**Quarterly**
	Aniline	50.0 lbs	0.00	Composite	**Quarterly**
	Benzene	0.059 lbs	0.142 mg/L	Composite	**Quarterly**
	Chlorobenzene	0.129 lbs	0.310 mg/L	Composite	**Quarterly**
	1, 2-Dichlorbenzene	0.197 lbs.	0.472 mg/L	Composite	**Quarterly**
	Fluoranthene	0.0417 lbs.	0.100 mg/L	Composite	**Quarterly**
	Acenaphtylene	0.131 lbs.	0.314 mg/L	Composite	**Quarterly**
	Naphthalene	0.131 lbs.	0.314 mg/L	Composite	**Quarterly**
	Anthracene	0.131 lbs.	0.314 mg/L	Composite	**Quarterly**

Sample Point	Parameter	Discharge Limitations		Sampling Requirements	
		Daily Max	Maid*	Type	Frequency
	Fluorene	0.131 lbs.	0.314 mg/L	Composite	Quarterly
	Phenanthrene	0.131 lbs.	0.314 mg/L	Composite	Quarterly

*M.A.I.D. – Maximum Allowable Instantaneous Discharge – Slug Limit.
SEE PAGE FOUR (4) FOR EXPLANATION OF SPECIFIC REQUIREMENTS.

PART I: SPECIFIC CONDITIONS

B. DISCHARGE MONITORING REPORTING REQUIREMENTS

During the period beginning the effective date of this permit and lasting until the expiration date, discharge monitoring results shall be summarized and reported quarterly by the permittee on the days specified below:

Sample Point	Parameter	Reporting Requirements	
		Initial Report	**Subsequent Reports**
001	All analytes	July 31, 2011	Every July 31, October 31, January 31, April 30**

** Each reporting dated is for samples collected during the previous quarter.

PART I: SPECIFIC CONDITIONS

C. SPECIAL REQUIREMENTS

(1) The pH meter must be calibrated and maintained in accordance with the manufacturer's specifications. The calibrations and the person(s) responsible for it must be recorded in a bound logbook. This logbook must be available for BSA inspection at all times.

(2) All flow meters must be calibrated and certified by a certified manufacturer's representative at least once per year. This report must be submitted with the annual report. All flow meters must be serviced and maintained in accordance with the manufacturer's specifications. The BSA must be notified of any malfunctions which last for more that 24 hours within three (3) days of the malfunction. If a flow meter, especially at SP001, remains out of service for more than five (5) consecutive days, the permittee must install a temporary meter until such time as the defective meter is repaired or replaced. The BSA at its option, may require a written report on any malfunctions.

(3) Surchargeable limit only.

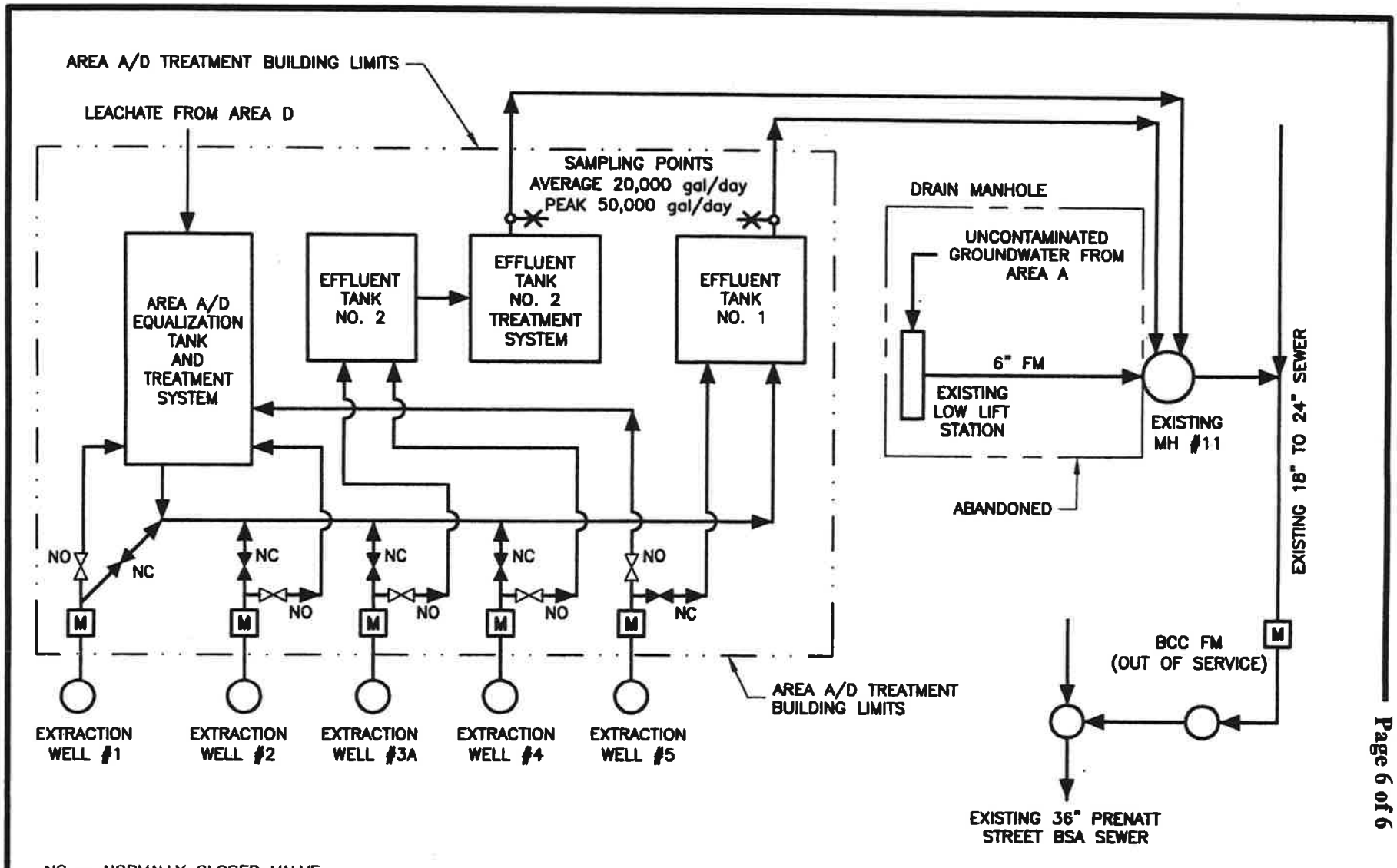
(4) Composite samples may be flow proportioned.

(5) EPA Test Method 604.

(6) The permittee must report any compound whose concentration is greater than 0.01 mg/L. The permittee is not authorized to discharge any of the parameters evaluated by these test procedures which may cause or contribute to a violation of water quality standards, worker health or safety limits or harm the sewerage system. Any parameter detected may at the discretion of the Buffalo Sewer Authority, be specifically limited and incorporated into this permit.

(7) Four grab samples must be properly taken and preserved over an equally spaced time period during a normal discharge day. The four grab samples must be flow proportionally composited at a New York State Department of Health certified lab.

(8) All samples collected for the base neutral and acid extractable EPA analytical test procedures must go through a special cleanup to prevent aniline and aniline derivative interference of the analytical method. The permittee must report any aniline and aniline derivative whose concentration is greater that 0.01 mg/L.



FORMER BUFFALO COLOR CORPORATION SITE BUFFALO, NY	Ontario Specialty Contracting, Inc.	GROUNDWATER EXTRACTION SYSTEM PROCESS FLOW DIAGRAM Figure 1

BUFFALO POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

PART II: GENERAL CONDITIONS

A. MONITORING AND REPORTING

1. Local Limits

Except as otherwise specified in this permit, the permit holder shall comply with all specific prohibitions, limits on pollutants or pollutant parameters set forth in the Buffalo Sewer Authority Sewer Use Regulations, as amended from time to time, and such prohibitions, limits and parameters shall be deemed pretreatment standards for purposes for the Clean Water Act.

2. Definitions

Definitions of terms contained in this permit are as defined in the Buffalo Sewer Authority Sewer Use Regulations.

3. Discharge Sampling Analysis

All Wastewater discharge samples and analyses and flow measurements shall be representative of the volume and character of the monitored discharge. Methods employed for flow measurements and sample collections and analyses shall conform to the Buffalo Sewer Authority "Sampling Measurement and Analytical Guidelines Sheet".

4. Recording of Results

For each measurement or sample taken pursuant to the requirements of the permit, the permittee shall record the information as required in the "Sampling Measurement and Analytical Guidelines Sheet".

5. Additional Monitoring by Permittee

If the permittee monitors any pollutants at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified in 40 CFR Part 136 the results of such monitoring shall be included in the calculation and reporting of values required under Part I, B. Such increased frequency shall also be indicated.

6. Reporting

All reports prepared in accordance with this Permit shall be submitted to:

Industrial Waste Section
Buffalo Sewer Authority Treatment Plant
90 West Ferry Street
Buffalo, New York 14213

All self-monitoring reports shall be prepared in accordance with the BSA "Sampling Measurement and Analytical Guidelines Sheet". These reporting requirements shall not relieve the permittee of any other reports, which may be required by the N.Y.S.D.E.C. or the U.S.E.P.A.

7. Certification Statement

All self-monitoring reports shall include the following certification statement, signed by the preparer of the report:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

B. PERMITTEE REQUIREMENTS

1. Change in Discharge [revised 08/2013]

All discharges authorized herein shall be consistent with the terms and conditions of this permit and with the information contained in the BPDES permit application on which basis this permit is granted. In the event of any facility expansions, production increases, process modifications or the installation, modification or repair of any pretreatment equipment which may result in new, different or increased discharges of pollutants, a new BPDES Permit application must be submitted prior to any change. Following receipt of an amended application, the BSA may modify this permit to specify and limit any pollutants not previously limited. In the event that the proposed change will be covered under an applicable Categorical Standard, a Baseline Monitoring Report must be submitted at least ninety (90) days prior to any discharge. A Baseline Monitoring Report shall be prepared in accordance with the BSA "Sampling Measurement and Analytical Guidelines Sheet".

2. Records Retention

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed, calibration and maintenance of instrumentation, and recordings from continuous monitoring instrumentation shall be retained at this facility for a minimum of three (3) years, or longer if requested by the General Manager.

3. Spill Prevention and Control Plan [added 08/2013]

The permittee shall have a plan to prevent and control spills into the sewer system. The plan shall be prepared in accordance with the BSA "Sampling Measurement and Analytical Guidelines Sheet"

4. Notification of Slug, Accidental Discharge or Spill

In the event that a slug, accidental discharge or any spill occurs at the facility for which this permit is issued, it is the responsibility of the permittee to immediately notify the B.S.A. Treatment Plant at 883-1820 of the quantity and character of such discharge. During normal business hours, Monday – Friday, 7:30 AM – 3:00 PM call 851-4661, ext. 5374. After 3:00 PM call ext. 851-4664, ext. 600. If requested by the B.S.A., Within five (5) days following all such discharges, the permittee shall submit a report describing the character and duration of the discharge, the cause of the discharge, and measures taken or that will be taken to prevent a recurrence of such discharge.

5. Noncompliance Notification [Revised 08/2013]

If, for any reason, the permittee does not comply with or will be unable to comply with any discharge limitation specified in this permit, the permittee or their assigns must verbally notify the Industrial Waste Section at 883-1820 851-4664, ext. 5374 within twenty-four (24) hours of becoming aware of the violation. The permittee shall also provide the Industrial Waste Section with the following information, in writing, within five (5) days of becoming aware of such condition:

a. a description of the discharge and cause of noncompliance and;

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

Additionally, the permittee shall repeat the sampling and analysis and submit these results of the report analysis to the Industrial Waste Section within 30 days after

becoming aware of the violation.

6. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the Buffalo Sewerage System resulting from noncompliance with any discharge limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

7. Waste Residuals

Solids, sludges, filter backwash or other pollutants removed in the course of treatment or control of wastewaters and/or the treatment of intake waters, shall be disposed of in a manner such as to prevent any pollutant from such materials from entering the Buffalo Sewer System.

8. Power Failures

In order to maintain compliance with the discharge limitations and prohibitions of this permit, the permittee shall provide an alternative power source sufficient to operate the wastewater control facilities; or, if such alternative power source is not provided the permittee shall halt, reduce or otherwise control production and/or controlled discharges upon the loss of power to the wastewater control facilities.

9. Treatment Upsets

a. Any industrial user which experiences an upset in operations that places it in a temporary state of noncompliance, which is not the result of operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation, shall inform the Industrial Waste Section immediately upon becoming aware of the upset. Where such information is given verbally, a written report shall be filed by the user within five (5) days. The report shall contain:

(i) A description of the upset, its cause(s) and impact on the discharger's compliance status;

(ii) The duration of noncompliance, including exact dates and times of noncompliance, and if the non-compliance is continuing, the time by which compliance is reasonably expected to be restored;

(iii) All steps taken or planned to reduce, eliminate, and prevent recurrence of such an upset.

b. An industrial user which complies with the notification provisions of this Section in a timely manner shall have an affirmative defense to any enforcement action brought by the Industrial Waste Section for any noncompliance of the limits in this permit, which arises out of violations attributable to and alleged to have occurred during the period of the documented and verified upset.

10. Treatment Bypasses

a. A bypass of the treatment system is prohibited unless the following conditions are met:

(i) The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; or

(ii) There was no feasible alternative to the bypass, including the use of auxiliary treatment or retention of the wastewater; and

(iii) The industrial user properly notified the Industrial Waste Section as described in paragraph b. below.

b. Industrial users must provide immediate notice to the Industrial Waste Section upon discovery of an unanticipated bypass. If necessary, the Industrial Waste Section may require the industrial user to submit a written report explaining the cause(s), nature, and duration of the bypass, and the steps being taken to prevent it's recurrence.

c. An industrial user may allow a bypass to occur which does not cause pretreatment standards or requirements to be violated, but only if it is for essential maintenance to ensure efficient operation of the treatment system. Industrial users anticipating a bypass must submit notice to the Industrial Waste Section at least ten (10) days in advance. The Industrial Waste Section may only approve the anticipated bypass if the circumstances satisfy those set forth in paragraph a. above.

C. PERMITTEE RESPONSIBILITIES

1. Permit Availability

The originally signed permit must be available upon request at all times for review at the address stated on the first page of this permit.

2. Inspections

The permittee shall allow the General Manager of the Buffalo Sewer Authority

and/or his authorized representatives, upon the presentation of credentials and during normal working hours or at any other reasonable times, to have access to and copy any records required in this permit; and to sample any discharge of pollutants.

3. Transfer of Ownership or Control

In the event of any change in control or ownership of facilities for which this permit has been issued the permit shall become null and void. The succeeding owner shall submit a completed Buffalo Sewer Authority permit application prior to discharge to the sewer system.

D. PERMITTEE LIABILITIES

1. Permit Modification

After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to the following:

a. Violation of any terms or conditions of this permit,

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts,

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

2. Imminent Danger

In the event there exists an imminent danger to health or property, the permitter reserves the right to take immediate action to halt the permitted discharge to the sewerage works.

3. Civil and Criminal Liability

Nothing in this permit shall relieve the permittee from any requirements, liabilities, or penalties under provisions of the "Sewer Regulations of the Buffalo Sewer Authority" or any Federal, State and/or local laws or regulations.

4. Penalties for Violations of Permit Conditions

The "Sewer Regulations of the Buffalo Sewer Authority" and the "Sewer Regulations for Erie County Sewer Districts" provides that any person who violates a B.P.D.E.S. permit condition is liable to the Authority for a civil penalty of up to $10,000.00 per day for each violation. Any person who willfully or negligently violates permit

conditions will be referred to the New York State Attorney General.

E. NATIONAL PRETREATMENT STANDARDS

If a pretreatment standard or prohibition (including any Schedule of Compliance specified in such pretreatment standard or prohibition) is established under Section 307 (b) of the Act for a pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with such pretreatment standard or prohibition.

F. PLANT CLOSURE

In the event of plant closure, the permittee is required to notify the Industrial Waste Section in writing as soon as an anticipated closure date is determined, but in no case later than five days of the actual closure.

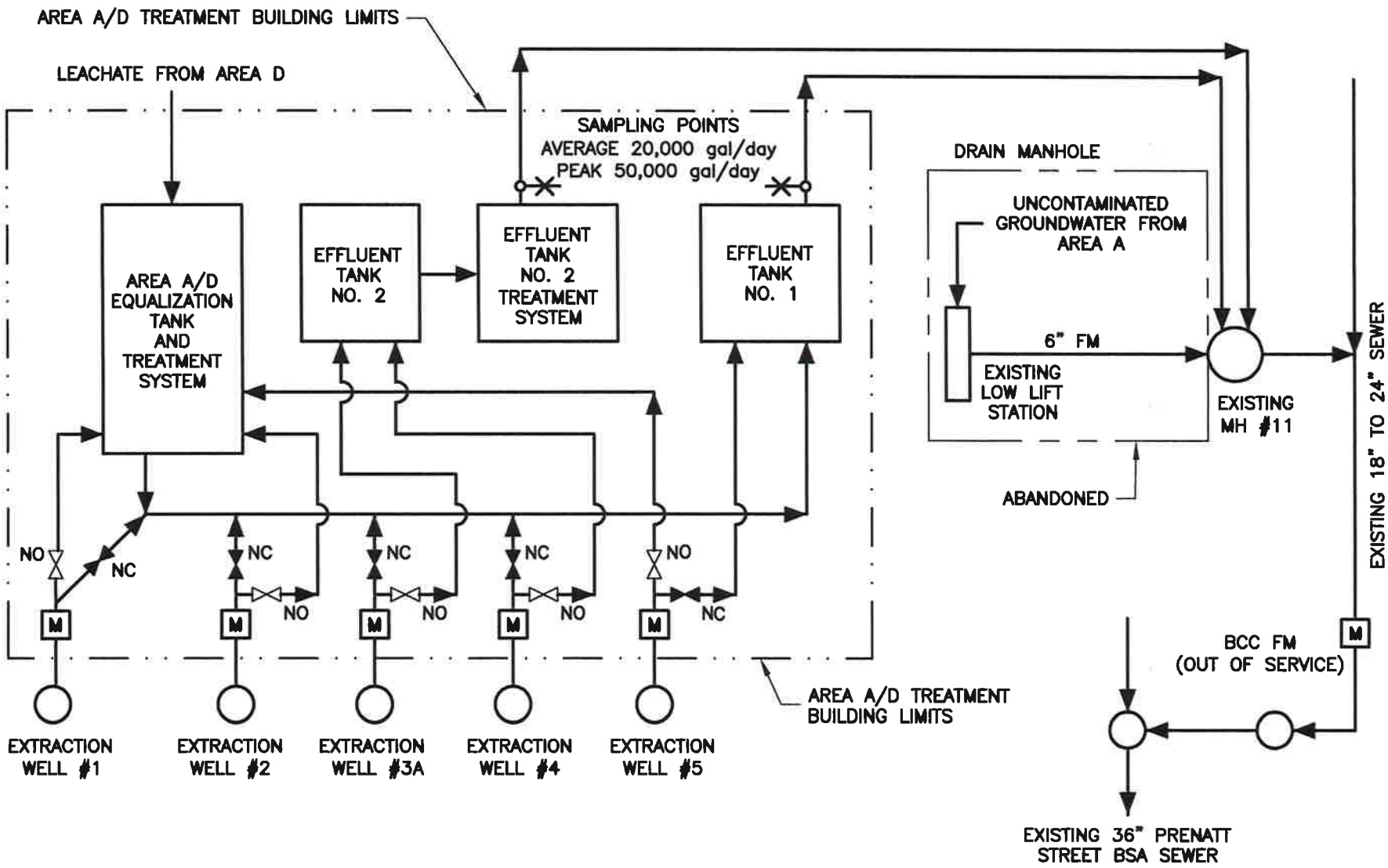
G. CONFIDENTIALITY

Except for data determined to be confidential under Section 308 of the Act, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Buffalo Sewer Authority. As required by the Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the Act.

H. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

Monitoring and Sampling Schematics



NC – NORMALLY CLOSED VALVE
NO – NORMALLY OPEN VALVE

FORMER BUFFALO COLOR CORPORATION SITE BUFFALO, NY	Ontario Specialty Contracting, Inc. Environmental Remediation • Demolition / Dismantlement • Brownfield Redevelopment	GROUNDWATER EXTRACTION SYSTEM PROCESS FLOW DIAGRAM Figure 1

Laboratory Analytical Results

Detection Summary

Client: Ontario Specialty Contracting, Inc.
Project/Site: 37745-Buffalo Color- Quarterly BSA SUMP

TestAmerica Job ID: 480-86582-1

Client Sample ID: BCC BSA SUMP_0915

Lab Sample ID: 480-86582-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Chlorobenzene	1.9	J	5.0	0.48	ug/L	1		624	Total/NA
Aniline	12		9.5	1.4	ug/L	1		625	Total/NA
Di-n-butyl phthalate	14		4.8	1.5	ug/L	1		625	Total/NA
Nitrobenzene	3.5	J	4.8	0.77	ug/L	1		625	Total/NA
Chromium	0.0023	J	0.0040	0.0010	mg/L	1		200.7 Rev 4.4	Total/NA
Copper	0.0018	J	0.010	0.0016	mg/L	1		200.7 Rev 4.4	Total/NA
Nickel	0.0027	J	0.010	0.0013	mg/L	1		200.7 Rev 4.4	Total/NA
Zinc	0.0051	J B	0.010	0.0015	mg/L	1		200.7 Rev 4.4	Total/NA
Phenolics, Total Recoverable	0.010		0.010	0.0050	mg/L	1		420.1	Total/NA
Cyanide, Amenable	0.060		0.010	0.0050	mg/L	1		SM 4500 CN G	Total/NA
Phosphorus	0.093		0.010	0.0050	mg/L as P	1		SM 4500 P E	Total/NA
Biochemical Oxygen Demand	2.9	b	2.0	2.0	mg/L	1		SM 5210B	Total/NA

Analyte	Result	Qualifier	RL	RL	Unit	Dil Fac	D	Method	Prep Type
Total Suspended Solids	13.2		4.0	4.0	mg/L	1		SM 2540D	Total/NA
pH	8.25	HF	0.100	0.100	SU	1		SM 4500 H+ B	Total/NA

Client Sample ID: TRIP BLANK

Lab Sample ID: 480-86582-2

No Detections.

This Detection Summary does not include radiochemical test results.

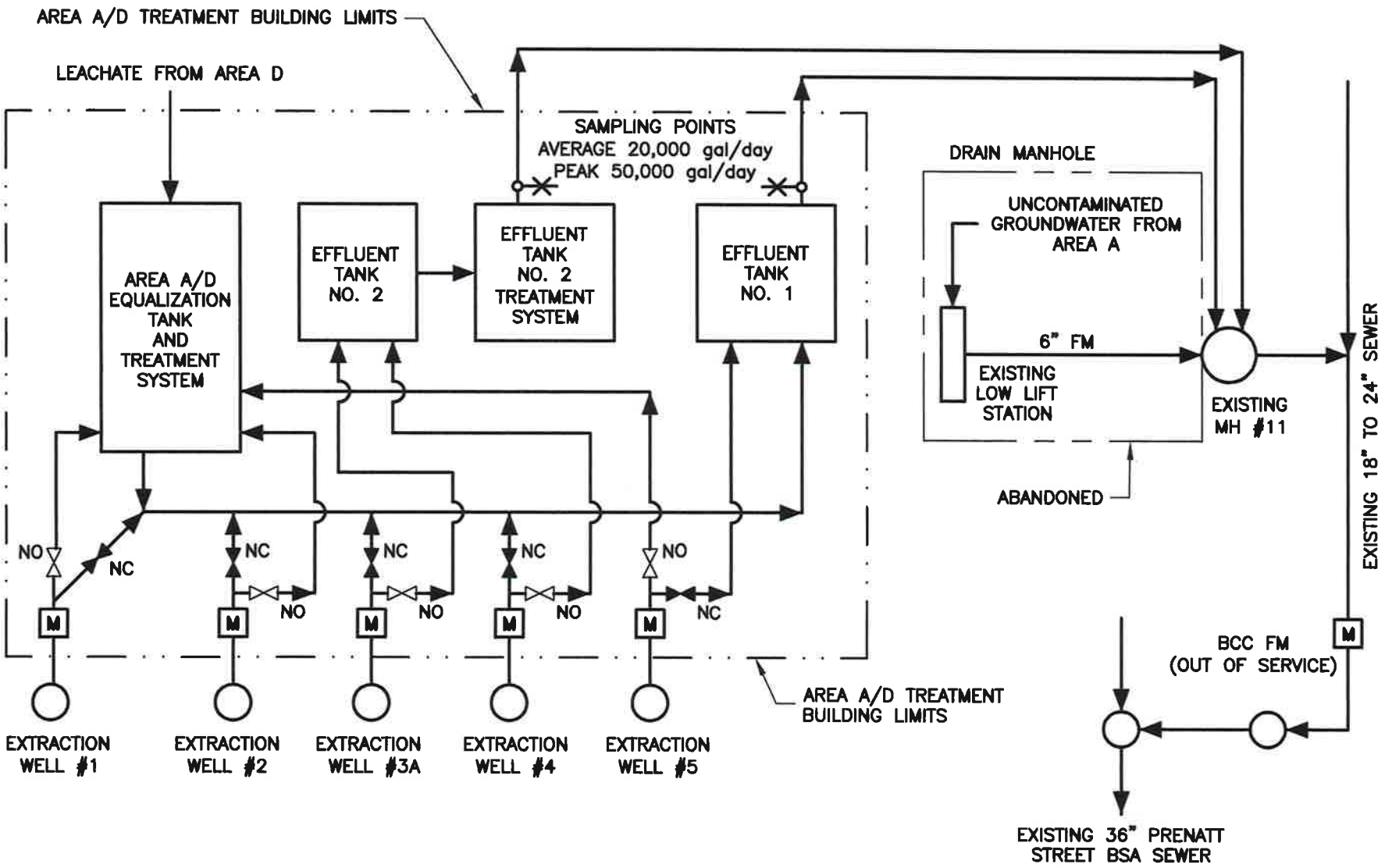
Field Data Collection Sheets

Buffalo Color GWTF Weekly Process Assessment

		Bag Filter F-1A/1B		Bag Filter F-2A/2B		Multi-Media Filter F-30		LGAC CA-40 and CA-41						Effluent Tank No. 1 T-28				Effluent Tank No. 2 T-27			Discharge Lines To BSA Sump					Comments
Date	Associate	Influent Pressure PI-1A	Effluent Pressure PI-1B	Influent Pressure PI-107A	Effluent Pressure PI-107B	Influent Pressure PI-30A	Effluent Pressure PI-30B	Flow Rate FE-60	Lead Influent Pressure PI-40A	Lead Effluent Pressure PI-40B	Lag Influent Pressure PI-41A	Lag Effluent Pressure PI-41B	PH Meter	Pressure PI-106A/B	Flow Rate FE-106	Totalizer FE-106	Pressure PI-106C	Flow Rate FE-107	Totalizer FE-107	Pressure PI-107C	Leak Detection Vault No. 1 Pressure PI-106D	Leak Detection Vault No. 1 Pressure PI-107D	Leak Detection Vault No. 3 Pressure PI-106E	Leak Detection Vault No. 3 Pressure PI-107E	Containment Line Pressure Gauge Checks	
7/10/2015	TW	48	48	33	23	51	39	15.4	38	37	37	36	7.28		16.7	13,120,726	32	27.8	9,713,703	20						
7/17/2015	TW	49	19	32	22	22	5	5.74	6	4	5	4	7.34		6.3	13,185,968	6	30.4	9,782,283	24						Readings taken before filter's changed
7/23/2015	TW	50	44	33	21	48	20	10.6	21	18	18	18	7.33	27	11.6	13,251,882	28	26	9,852,230	19	6	8	2	3		
7/31/2015	TW	49	49	33	25	51	37	15	38	35	36	34	7.02	28	15.9	13,323,861	30	29	9,927,598	23	7	8	2	3		
8/10/2015	TW	49	45	33	24	47	35	14.2	35	32	33	31	7.37		15.9	13,406,287	28	27.6	10,039,742	21	7	9	3	3		
8/14/2015	TW	48	45	33	21	47	35	14.5	36	34	34	33	7.31		16	13,439,427	29	28	10,067,858	18						
8/21/2015	TW	48	47	33	15	50	36	14.3	36	34	35	33	7.4	29	16	13,486,828	29	21.2	10,097,436	13						
8/28/2015	TW	48	48	33	25	50	37	14.5	37	35	36	33	7.1	30	14.8	13,552,389	30	26.8	10,132,382	20	8	8	3	3		
9/11/2015	TW	48	48	33	21	51	39	14.3	38	37	37	35	7.46	30	14.8	13,656,535	32	26.4	10,168,998	18	7	8	3	3		
9/18/2015	TW	49	46	33	23	50	37	13.3	37	33	34	32	7.76	28	14.7	13,729,060	29	29.7	10,233,607	25	7	11	3	3		

Buffalo Color GWTF Daily Maintenance & Repair Log													
DATE	D1A GAC SERVICE	D1B GAC SERVICE	D2 GAC SERVICE	MMF SERVICE	D1A GAC FLUSH	D1B GAC FLUSH	D2 GAC FLUSH	MMF FLUSH	BF 1A CHANGE	BF 1B CHANGE	BF 2A CHANGE	BF 2B CHANGE	ADDITIONAL NOTES / NON ROUTINE REPAIR & MAINTENANCE
7/1/2015									1	1	1		
7/2/2015		1					1	1	1	1	1	1	New Gac Vessal-carbon
7/3/2015													
7/4/2015													
7/5/2015													
7/6/2015								1	1	1			
7/7/2015					1	1	1	1	1	1	1	1	
7/8/2015									1	1			
7/9/2015													
7/10/2015					1	1		1	1	1	1	1	
7/11/2015													
7/12/2015													
7/13/2015								1	2	2			
7/14/2015									1	1			
7/15/2015							1				1	1	
7/16/2015								1	1	1			
7/17/2015								1	1	1	1	1	
7/18/2015													
7/19/2015													
7/20/2015								1	2	2			
7/21/2015								1	1	1	4	1	Acid 4 & 5 "A"
7/22/2015								1	1	1			
7/23/2015							1	1	1		1		
7/24/2015					1	1		1	1	1			
7/25/2015													
7/26/2015													
7/27/2015								1	1	1			Clean M M filter
7/28/2015								1	1		1		
7/29/2015								1	1	1			
7/30/2015							1	1		1	1	1	
7/31/2015					1	1			1	1	1		
8/1/2015													
8/2/2015													
8/3/2015								1	1	1			
8/4/2015								1	1		1		"A"-2&4 cleaned, develop w/jetter
8/5/2015								1		1			
8/6/2015							2	1	1		1	1	
8/7/2015								1	1	1			
8/8/2015													
8/9/2015													
8/10/2015								1	1	1			
8/11/2015								1	1	1			
8/12/2015								1	1	1			
8/13/2015											1	1	
8/14/2015					1	1	1	1	1	1			
8/15/2015													
8/16/2015													
8/17/2015													
8/18/2015								1	2	1			
8/19/2015								1	1	1			
8/20/2015							1	1	1	1			
8/21/2015					1	1	1	1	1	1	1		Change pump #4 "A"
8/22/2015													
8/23/2015													

Buffalo Color GWTF Daily Maintenance & Repair Log													
DATE	D1A GAC SERVICE	D1B GAC SERVICE	D2 GAC SERVICE	MMF SERVICE	D1A GAC FLUSH	D1B GAC FLUSH	D2 GAC FLUSH	MMF FLUSH	BF 1A CHANGE	BF 1B CHANGE	BF 2A CHANGE	BF 2B CHANGE	ADDITIONAL NOTES / NON ROUTINE REPAIR & MAINTENANCE
8/24/2015								1	1	1			
8/25/2015								1	1	1			
8/26/2015							1	1	1		1	1	
8/27/2015								1	1				
8/28/2015					1	1		1	1	1			
8/29/2015													
8/30/2015													
8/31/2015					1	1	1	1	1	1	1		
9/1/2015								1	2	1			
9/2/2015								1		1			
9/3/2015					1			1	1	1			
9/4/2015													
9/5/2015													
9/6/2015													
9/7/2015													
9/8/2015								1	2	1			
9/9/2015								1	1	1			
9/10/2015							1	1	1		1	1	Acid #5 line: Change pump #3a
9/11/2015					1	1		1	1	1			
9/12/2015													
9/13/2015													
9/14/2015								1	1	1			Acid line #4a
9/15/2015								1	1	1	2	1	
9/16/2015								1		1	2		
9/17/2015							1	1	1	1	1	1	
9/18/2015					1			1	1	1			
9/19/2015													
9/20/2015													
9/21/2015								1	1	1	1		
9/22/2015								1	1	1			
9/23/2015								1	1	1			
9/24/2015								1	1	1			
9/25/2015					1	1		1	1	1			
9/26/2015													
9/27/2015													
9/28/2015								1	2	2			#4 New cable: #3 New pump
9/29/2015								1		1			
9/30/2015								1	1	1			



NC – NORMALLY CLOSED VALVE
NO – NORMALLY OPEN VALVE

FORMER BUFFALO COLOR CORPORATION SITE BUFFALO, NY	Ontario Specialty Contracting, Inc. Environmental Remediation • Demolition / Dismantlement • Brownfield Redevelopment	GROUNDWATER EXTRACTION SYSTEM PROCESS FLOW DIAGRAM Figure 1

ATTACHMENT F

DATA USABILITY SUMMARY REPORTS

DATA VALIDATION SUMMARY REPORT AREA D 2015 INFLUENT GROUNDWATER SAMPLING

HONEYWELL BUFFALO COLOR AREA D
BUFFALO, NEW YORK

Prepared for

Honeywell

115 Tabor Road
Morris Plains, New Jersey 07950

Prepared by

amec foster wheeler

Amec Foster Wheeler Environment & Infrastructure, Inc.
200 American Metro Boulevard, Suite 113
Hamilton, New Jersey 08619

MARCH 2016

Honeywell

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TABLES

1.0 INTRODUCTION

Data validation was completed on influent groundwater samples collected in June 2015. Samples were analyzed by TestAmerica Laboratories in Buffalo, New York and results were reported in data package Sample delivery group (SDG), 480-81496-1. A summary of laboratory data packages and samples is presented in Table 1. The following United States Environmental Protection Agency (USEPA, 1996) analytical methods were performed:

- Volatile organic compounds by USEPA Method E624.
- Semivolatile organic compounds by USEPA Method E625.
- Polychlorinated biphenyls by USEPA Method E608.
- Phenolics, total recoverable by USEPA Method E420.1.
- Metals by USEPA Method E200.7.
- Mercury by USEPA Method E245.1.
- Cyanide, amenable by USEPA Method SM 4500 CN G.
- Phosphorus by USEPA Method SM 4500 P E.

Data validation was completed using Level II procedures described for Honeywell projects. During the Level II data validation the following data quality indicators are reviewed.

- Lab Report Narrative.
- Sample Collection and Holding Times.
- Quality Control (QC) Blanks.
- Laboratory Control Samples (LCS)/Lab Control Sample Duplicate.
- Matrix Spike/Matrix Spike Duplicates.
- Laboratory and Field Duplicates.
- Surrogate Spikes.
- Reporting Limits.
- Data Completeness.
- Electronic Data Verification.

Data qualification was completed using general procedures in USEPA validation guidelines (USEPA, 2004; USEPA, 2008a; USEPA, 2008b). Project specific QC limits were used when

assessing precision and accuracy (Table 2) as described in the Quality Assurance Project Plan (QAPP) (MACTEC, 2006).

A Honeywell Level II data validation was completed on the entire data set and data validation findings from the Level II validation are reported in Section 2. Data QC reviews are completed using laboratory QC summary forms and the Locus Technology Environmental Information Management (EIM) system. The EIM system has a computerized data validation module that performs data validation for QC checks specified for Level II validation. Sample results and associated QC data are compared to project specific QC limits that are set up by the project chemist prior to running the validation module. The EIM assigns validation reason codes to all results that are associated with QC measurements outside project QC goals, and the validation module applies data validation qualifiers to the final results. The data qualification actions are reviewed by the project chemist prior to accepting the final data.

Data QC reviews are completed using laboratory QC summary forms. Data qualifications are completed if necessary in accordance with the guidelines using the following qualifiers:

U = The target compound was not detected at concentrations greater than the quantitation limit.

J = The reported concentration is considered an estimated value.

UJ = The target compound was not detected and the reporting limit is considered to be estimated.

R= The result is rejected and is considered to be unusable

The Level II validation qualification actions for this data set and associated validation reason codes are presented on Table 3. The following data validation reason code was applied to one or more sample results:

LCSL=LCS recovery less than the lower criteria limit

Sample results that are not included on Table 3 were interpreted to be usable as reported by the laboratory. A complete summary of final ground water sample results is provided on Table 4.

2.0 DATA VALIDATION ACTIONS AND OBSERVATIONS

QC parameters and measurements checked during validation met requirements in the analytical method and/or validation guidelines and QAPP. Unless specified below, results are interpreted to be usable as reported by the laboratory

2.1 VOLATILE ORGANIC COMPOUNDS

The data were evaluated based on the following parameters:

* Collection and Preservation
* Holding Times
* Data completeness
* Blanks
* LCS
* Surrogate Spikes

Reporting Limits

* Data Completeness
* Electronic Data Verification

* - Criteria were met for this parameter.

2.1.1 June Event

Reporting Limits

The sample from location Area D Influent was analyzed at a dilution. Reporting limits for target compounds in the following samples are elevated due to dilution.

Field Sample ID	Lab Sample ID	Method	DF
BCC Area D Influent 0615	480-81496-1	E624	10

2.2 SEMI-VOLATILE ORGANIC COMPOUNDS

The data were evaluated based on the following parameters:

* Collection and Preservation

* Holding Times
* Blanks

LCS

* Surrogate Spikes
* Reporting Limits
* Data Completeness
* Electronic Data Verification

* - Criteria were met for this parameter.

2.2.1 June Event

LCS

The LCS percent recovery was less than the QC limit of 70 percent for 1,4-dichlorobenzene (35), phenol (28), 1,2,4-trichlorobenzene (42), decane (22), 1,3-dichlorobenzene (33), hexachloroethane (26), hexachlorocyclopentadiene (26) and 1,2-dichlorobenzene (37) in SDG 480-81496-1, which may indicate low bias. Results for these compounds were qualified as estimated (J/UJ) with reason code LCSL. A summary of qualified sample results is presented in Table 3.

2.3 POLYCHLORINATED BIPHENYLS

The data were evaluated based on the following parameters:

* Collection and Preservation
* Holding Times
* Blanks
* LCS
* Reporting Limits
* Data Completeness
* Electronic Data Verification

* - all criteria were met for this parameter.

2.3.1 June Event

No QC issues observed.

2.4 PHENOLICS, TOTAL RECOVERABLE

The data were evaluated based on the following parameters:

* Collection and Preservation
* Holding Times
* Blanks
* LCS
* Reporting Limits
* Data Completeness
* Electronic Data Verification

* - all criteria were met for this parameter.

2.4.1 June Event

No QC issues observed.

2.5 METALS

The data were evaluated based on the following parameters:

* Collection and Preservation
* Holding Times
* Blanks
* LCS
* Reporting Limits
* Data Completeness
* Electronic Data Verification

* - all criteria were met for this parameter.

2.5.1 June Event

No QC issues observed.

2.6 CYANIDE, AMENABLE AND PHOSPHORUS

The data were evaluated based on the following parameters:

* Collection and Preservation
* Holding Times
* Blanks
* LCS
* Reporting Limits
* Data Completeness
* Electronic Data Verification

* - all criteria were met for this parameter.

2.6.1 June Event

No QC issues observed.

3.0 REFERENCES

MACTEC, 2006. "Buffalo Color Quality Assurance Project Plan"; Appendix D – Quality Assurance/Quality Control, 2006.

U.S. Environmental Protection Agency (USEPA), 1996. "Test Methods for Evaluating Solid Waste"; Laboratory Manual Physical/Chemical Methods; Office of Solid Waste and Emergency Response; Washington, DC; SW-846; November 1986; Revision 4 - December 1996.

USEPA, 2004. "USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review"; Office of Superfund Remediation and Technology Innovation; EPA-540-R-04-004; October 2004.

U.S. Environmental Protection Agency (USEPA) Region II, 2008a. "Validating Volatile Organic Compounds by Gas Chromatography/Mass Spectrometry SW-846 Method 8260B"; SOP No. HW-24, Revision 2; August 2008.

U.S. Environmental Protection Agency (USEPA) Region II, 2008b. "Validating Semivolatile Organic Compounds by Gas Chromatography/Mass Spectrometry SW-846 Method 8270D"; SOP No. HW-22, Revision 4; August 2008.

4.0 LIST OF ACRONYMS AND ABBREVIATIONS

EIM	Environmental Information Management
LCS	Laboratory Control Samples
QAPP	Quality
QC	Quality Control
SVOC	Semi Volatile Organic Compound
TAL	TestAmerica Laboratories
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound

Data Validator: Dilip Kumar

March 18, 2016

Senior Chemist: Chris Ricardi, NRCC-EAC

March 31, 2016

TABLES

TABLE 1
SAMPLE AND ANALYTICAL SUMMARY
DATA VALIDATION SUMMARY REPORT
2015 AREA D INFLUENT GROUNDWATER SAMPLING
HONEYWELL – BUFFALO COLOR AREA E
BUFFALO, NEW YORK

				Parameter	VOCs	SVOCs	PCBs	Phenolics	Metals	Mercury
				Method	E624	E625	E608	E420.1	E200.7	E245.1
SDG	Field Sample ID	Location ID	Type	Date						
480-81496-1	BCC Area D Influent 0615	Area D Influent	REG	6/3/2015	33	60	7	1	5	1

Notes
REG: Regular sample

TABLE 1
SAMPLE AND ANALYTICAL SUMMARY
DATA VALIDATION SUMMARY REPORT
2015 AREA D INFLUENT GROUNDWATER SAMPLING
HONEYWELL – BUFFALO COLOR AREA E
BUFFALO, NEW YORK

				Cyanide, Amenable	Phosphorus
				SM-4500-CNG	SM4500-P E
SDG	Field Sample ID	Location ID	Type		
480-81496-1	BCC Area D Influent 0615	Area D Influent	REG	1	1

Notes
REG: Regular sample

TABLE 2
PROJECT PRECISION AND ACCURACY GOALS
DATA VALIDATION SUMMARY REPORT
2015 AREA D INFLUENT GROUNDWATER SAMPLING
HONEYWELL – BUFFALO COLOR AREA E
BUFFALO, NEW YORK

PARAMETER	QC TEST	ANALYTE	WATER (%R)	Water (RPD)
Volatiles	Surrogate	All Surrogate Compounds	80 - 120	
	LCS	All Target Compounds	70 - 130	
	MS/MSD	All Target Compounds	70 - 130	20
	Field Duplicate	All Target Compounds		50
Semivolatiles	Surrogate	All BN Compounds	50 - 140	
		All Acid Compounds	30 - 140	
	LCS	All BN Compounds	50 - 140	
		All Acid Compounds	30 - 140	
	MS/MSD	All BN Compounds	50 - 140	20
		All Acid Compounds	30 - 140	20
	Field Duplicate	All Target Compounds		50
PCBs	Surrogate	All Surrogate Compounds	30 - 150	
	LCS	All Target Compounds	40 - 140	
	MS/MSD	All Target Compounds	30 - 150	20
	Field Duplicate	All Target Compounds		50
Inorganics-Metals	LCS	All Target Analytes	80 - 120	
	MS/MSD	All Target Analytes	75 -125	30
	Lab Duplicate	All Target Analytes		30
	Field Duplicate	All Target Analytes		50

Notes:
LCS - Laboratory Control Sample
MS/MSD - Matrix spike/ Matrix Spike Duplicate
RPD = Relative percent difference
%R = percent recovery
QC Limits are based on USEPA Region II Data Validation Guidelines and Project QA/QC Objectives

TABLE 3
VALIDATON ACTIONS SUMMARY
DATA VALIDATION SUMMARY REPORT
2015 AREA D INFLUENT GROWNDWATER SAMPLING
HONEYWELL – BUFFALO COLOR AREA E
BUFFALO, NEW YORK

Field Sample ID	Type	SDG	Method	Parameter	Lab Result	Lab Qual	Val Qual	Reason Codes	Units
BCC Area D Influent 0615	REG	480-81496-1	E625	1,2,4-Trichlorobenzene	9.5	U,*	UJ	LCSL	µg/L
BCC Area D Influent 0615	REG	480-81496-1	E625	1,2-Dichlorobenzene	5.5	J	J	LCSL	µg/L
BCC Area D Influent 0615	REG	480-81496-1	E625	1,3-Dichlorobenzene	3.2	J	J	LCSL	µg/L
BCC Area D Influent 0615	REG	480-81496-1	E625	1,4-Dichlorobenzene	31		J	LCSL	µg/L
BCC Area D Influent 0615	REG	480-81496-1	E625	Decane	9.5	U,*	UJ	LCSL	µg/L
BCC Area D Influent 0615	REG	480-81496-1	E625	Hexachlorocyclopentadiene	4.7	U	UJ	LCSL	µg/L
BCC Area D Influent 0615	REG	480-81496-1	E625	Hexachloroethane	4.7	U,*	UJ	LCSL	µg/L
BCC Area D Influent 0615	REG	480-81496-1	E625	Phenol	1.1	J	J	LCSL	µg/L

Notes:
LCSL= LCS recovery less than the lower limit
U= Undetected
J= Estimated

TABLE 4
FINAL RESULTS
DATA VALIDATION SUMMARY REPORT
2015 AREA D INFLUENT GROUNDWATER SAMPLING
HONEYWELL – BUFFALO COLOR AREA E
BUFFALO, NEW YORK

		Field Sample ID	BCC Area D Influent 0615
		Location	Area D Influent
		Sample Date	06/03/2015
		Sample Delivery Group	480-81496-1
Units	Method	Parameter Name	
µg/L	1,1,1-Trichloroethane	E624	50 U
µg/L	1,1,2,2-Tetrachloroethane	E624	50 U
µg/L	1,1,2-Trichloroethane	E624	50 U
µg/L	1,1-Dichloroethane	E624	50 U
µg/L	1,1-Dichloroethene	E624	50 U
µg/L	1,2-Dichlorobenzene	E624	11 J
µg/L	1,2-Dichloroethane	E624	50 U
µg/L	1,2-Dichloroethene, Total	E624	100 U
µg/L	1,2-Dichloropropane	E624	50 U
µg/L	1,3-Dichlorobenzene	E624	6.7 J
µg/L	1,4-Dichlorobenzene	E624	64
µg/L	2-Chloroethyl vinyl ether	E624	250 U
µg/L	Acrolein	E624	1000 U
µg/L	Acrylonitrile	E624	1000 U
µg/L	Benzene	E624	150
µg/L	Bromodichloromethane	E624	50 U
µg/L	Bromoform	E624	50 U
µg/L	Bromomethane	E624	50 U
µg/L	Carbon tetrachloride	E624	50 U
µg/L	Chlorobenzene	E624	3900
µg/L	Chloroethane	E624	50 U
µg/L	Chloroform	E624	50 U
µg/L	Chloromethane	E624	50 U
µg/L	cis-1,3-Dichloropropene	E624	50 U
µg/L	Dibromochloromethane	E624	50 U
µg/L	Ethylbenzene	E624	50 U
µg/L	Methylene Chloride	E624	50 U
µg/L	Tetrachloroethene	E624	50 U
µg/L	Toluene	E624	50 U
µg/L	trans-1,3-Dichloropropene	E624	50 U
µg/L	Trichloroethene	E624	50 U
µg/L	Trichlorofluoromethane	E624	50 U
µg/L	Vinyl chloride	E624	50 U
µg/L	1,2,4-Trichlorobenzene	E625	9.5 UJ
µg/L	1,2-Dichlorobenzene	E625	5.5 J
µg/L	1,2-Diphenylhydrazine	E625	9.5 U
µg/L	1,3-Dichlorobenzene	E625	3.2 J
µg/L	1,4-Dichlorobenzene	E625	31 J
µg/L	2,2'-oxybis[1-chloropropane]	E625	4.7 U
µg/L	2,4,6-Trichlorophenol	E625	4.7 U
µg/L	2,4-Dichlorophenol	E625	1.5 J
µg/L	2,4-Dimethylphenol	E625	4.7 U
µg/L	2,4-Dinitrophenol	E625	9.5 U
µg/L	2,4-Dinitrotoluene	E625	4.7 U
µg/L	2,6-Dinitrotoluene	E625	4.7 U
µg/L	2-Chloronaphthalene	E625	4.7 U
µg/L	2-Chlorophenol	E625	5.4
µg/L	2-Nitrophenol	E625	4.7 U
µg/L	3,3'-Dichlorobenzidine	E625	4.7 U

TABLE 4
FINAL RESULTS
DATA VALIDATION SUMMARY REPORT
2015 AREA D INFLUENT GROUNDWATER SAMPLING
HONEYWELL – BUFFALO COLOR AREA E
BUFFALO, NEW YORK

Units	Method	Field Sample ID / Location / Sample Date / Sample Delivery Group / Parameter Name	BCC Area D Influent 0615 / Area D Influent / 06/03/2015 / 480-81496-1
µg/L	4,6-Dinitro-2-methylphenol	E625	9.5 U
µg/L	4-Bromophenyl phenyl ether	E625	4.7 U
µg/L	4-Chloro-3-methylphenol	E625	4.7 U
µg/L	4-Chlorophenyl phenyl ether	E625	4.7 U
µg/L	4-Nitrophenol	E625	9.5 U
µg/L	Acenaphthene	E625	4.7 U
µg/L	Acenaphthylene	E625	4.7 U
µg/L	Aniline	E625	3.8 J
µg/L	Anthracene	E625	4.7 U
µg/L	Benzidine	E625	76 U
µg/L	Benzo[a]anthracene	E625	4.7 U
µg/L	Benzo[a]pyrene	E625	4.7 U
µg/L	Benzo[b]fluoranthene	E625	4.7 U
µg/L	Benzo[g,h,i]perylene	E625	4.7 U
µg/L	Benzo[k]fluoranthene	E625	4.7 U
µg/L	Bis(2-chloroethoxy)methane	E625	4.7 U
µg/L	Bis(2-chloroethyl)ether	E625	4.7 U
µg/L	Bis(2-ethylhexyl) phthalate	E625	9.5 U
µg/L	Butyl benzyl phthalate	E625	4.7 U
µg/L	Chrysene	E625	4.7 U
µg/L	Decane	E625	9.5 UJ
µg/L	Dibenz(a,h)anthracene	E625	4.7 U
µg/L	Diethyl phthalate	E625	4.7 U
µg/L	Dimethyl phthalate	E625	4.7 U
µg/L	Di-n-butyl phthalate	E625	4.7 U
µg/L	Di-n-octyl phthalate	E625	4.7 U
µg/L	Fluoranthene	E625	4.7 U
µg/L	Fluorene	E625	4.7 U
µg/L	Hexachlorobenzene	E625	4.7 U
µg/L	Hexachlorobutadiene	E625	4.7 U
µg/L	Hexachlorocyclopentadiene	E625	4.7 UJ
µg/L	Hexachloroethane	E625	4.7 UJ
µg/L	Indeno[1,2,3-cd]pyrene	E625	4.7 U
µg/L	Isophorone	E625	4.7 U
µg/L	Naphthalene	E625	3.4 J
µg/L	Nitrobenzene	E625	4.7 U
µg/L	N-Nitrosodimethylamine	E625	9.5 U
µg/L	N-Nitrosodi-n-propylamine	E625	4.7 U
µg/L	N-Nitrosodiphenylamine	E625	2.8 J
µg/L	n-Octadecane	E625	9.5 U
µg/L	Pentachlorophenol	E625	9.5 U
µg/L	Phenanthrene	E625	4.7 U
µg/L	Phenol	E625	1.1 J
µg/L	Pyrene	E625	4.7 U
µg/L	PCB-1016	E608	0.058 U
µg/L	PCB-1221	E608	0.058 U
µg/L	PCB-1232	E608	0.058 U
µg/L	PCB-1242	E608	0.058 U
µg/L	PCB-1248	E608	0.058 U

TABLE 4
FINAL RESULTS
DATA VALIDATION SUMMARY REPORT
2015 AREA D INFLUENT GROUNDWATER SAMPLING
HONEYWELL – BUFFALO COLOR AREA E
BUFFALO, NEW YORK

Units	Method	Field Sample ID Location Sample Date Sample Delivery Group Parameter Name	BCC Area D Influent 0615 Area D Influent 06/03/2015 480-81496-1
µg/L	PCB-1254	E608	0.058 U
µg/L	PCB-1260	E608	0.058 U
mg/L	Total Recoverable Phenolics	E420.1	0.029
mg/L	Chromium	E200.7	0.014
mg/L	Copper	E200.7	0.0064 J
mg/L	Lead	E200.7	0.0033 J
mg/L	Nickel	E200.7	0.021
mg/L	Zinc	E200.7	0.0054 J
mg/L	Mercury	E245.1	0.00020 U
mg/L	Cyanide, Amenable	SM-4500-CNG	0.0083 J
mg/L	Total Phosphate as P	SM4500-P E	0.27

Notes
U = undetected
J = estimated value

ATTACHMENT G

GROUNDWATER ANALYTICAL REPORTS

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

ANALYTICAL REPORT

TestAmerica Laboratories, Inc.
TestAmerica Buffalo
10 Hazelwood Drive
Amherst, NY 14228-2298
Tel: (716)691-2600

TestAmerica Job ID: 480-81496-1
Client Project/Site: Buffalo Color Area D Annual Influent
Sampling Event: Buffalo Color Area D Annual Influent

For:
Ontario Specialty Contracting, Inc.
333 Ganson St.
Buffalo, New York 14203

Attn: Andrew Madden

Authorized for release by:
6/17/2015 10:40:28 AM
Rebecca Jones, Project Management Assistant I
rebecca.jones@testamericainc.com

Designee for

John Schove, Project Manager II
(716)504-9838
john.schove@testamericainc.com

LINKS

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The test results in this report meet all 2003 NELAC and 2009 TNI requirements for accredited parameters, exceptions are noted in this report. This report may not be reproduced except in full, and with written approval from the laboratory. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.

Qualifiers

GC/MS VOA

Qualifier	Qualifier Description
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

GC/MS Semi VOA

Qualifier	Qualifier Description
*	LCS or LCSD is outside acceptance limits.
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Metals

Qualifier	Qualifier Description
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

General Chemistry

Qualifier	Qualifier Description
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
¤	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CNF	Contains no Free Liquid
DER	Duplicate error ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision level concentration
MDA	Minimum detectable activity
EDL	Estimated Detection Limit
MDC	Minimum detectable concentration
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
NC	Not Calculated
ND	Not detected at the reporting limit (or MDL or EDL if shown)
PQL	Practical Quantitation Limit
QC	Quality Control
RER	Relative error ratio
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)

Detection Summary

Client: Ontario Specialty Contracting, Inc.
Project/Site: Buffalo Color Area D Annual Influent

TestAmerica Job ID: 480-81496-1

Client Sample ID: BCC Area D Influent 0615

Lab Sample ID: 480-81496-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Benzene	150		50	6.0	ug/L	10		624	Total/NA
1,2-Dichlorobenzene	11	J	50	4.4	ug/L	10		624	Total/NA
1,3-Dichlorobenzene	6.7	J	50	5.4	ug/L	10		624	Total/NA
1,4-Dichlorobenzene	64		50	5.1	ug/L	10		624	Total/NA
Chlorobenzene - DL	3900		200	19	ug/L	40		624	Total/NA
1,2-Dichlorobenzene	5.5	J	9.5	4.7	ug/L	1		625	Total/NA
1,3-Dichlorobenzene	3.2	J	9.5	0.65	ug/L	1		625	Total/NA
1,4-Dichlorobenzene	31		9.5	4.7	ug/L	1		625	Total/NA
2,4-Dichlorophenol	1.5	J	4.7	0.73	ug/L	1		625	Total/NA
2-Chlorophenol	5.4		4.7	0.62	ug/L	1		625	Total/NA
Aniline	3.8	J	9.5	1.4	ug/L	1		625	Total/NA
Naphthalene	3.4	J	4.7	0.81	ug/L	1		625	Total/NA
N-Nitrosodiphenylamine	2.8	J	4.7	0.37	ug/L	1		625	Total/NA
Phenol	1.1	J	4.7	0.33	ug/L	1		625	Total/NA
Chromium	0.014		0.0040	0.0010	mg/L	1		200.7 Rev 4.4	Total/NA
Copper	0.0064	J	0.010	0.0016	mg/L	1		200.7 Rev 4.4	Total/NA
Lead	0.0033	J	0.0050	0.0030	mg/L	1		200.7 Rev 4.4	Total/NA
Nickel	0.021		0.010	0.0013	mg/L	1		200.7 Rev 4.4	Total/NA
Zinc	0.0054	J	0.010	0.0015	mg/L	1		200.7 Rev 4.4	Total/NA
Total Recoverable Phenolics	0.029		0.010	0.0050	mg/L	1		420.1	Total/NA
Cyanide, Amenable	0.0083	J	0.010	0.0050	mg/L	1		SM 4500 CN G	Total/NA
Total Phosphate as P	0.27		0.010	0.0050	mg/L as P	1		SM 4500 P E	Total/NA

This Detection Summary does not include radiochemical test results.

Client Sample ID: BCC Area D Influent 0615

Date Collected: 06/03/15 09:00
Date Received: 06/03/15 15:45

Lab Sample ID: 480-81496-1

Matrix: Water

Method: 625 - Semivolatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
1,2,4-Trichlorobenzene	ND	*	9.5	0.78	ug/L		06/06/15 07:43	06/11/15 13:43	1
1,2-Dichlorobenzene	**5.5**	**J**	9.5	4.7	ug/L		06/06/15 07:43	06/11/15 13:43	1
1,2-Diphenylhydrazine	ND		9.5	0.74	ug/L		06/06/15 07:43	06/11/15 13:43	1
1,3-Dichlorobenzene	**3.2**	**J**	9.5	0.65	ug/L		06/06/15 07:43	06/11/15 13:43	1
1,4-Dichlorobenzene	**31**		9.5	4.7	ug/L		06/06/15 07:43	06/11/15 13:43	1
2,2'-oxybis[1-chloropropane]	ND		4.7	0.79	ug/L		06/06/15 07:43	06/11/15 13:43	1
2,4,6-Trichlorophenol	ND		4.7	0.95	ug/L		06/06/15 07:43	06/11/15 13:43	1
2,4-Dichlorophenol	**1.5**	**J**	4.7	0.73	ug/L		06/06/15 07:43	06/11/15 13:43	1
2,4-Dimethylphenol	ND		4.7	1.3	ug/L		06/06/15 07:43	06/11/15 13:43	1
2,4-Dinitrophenol	ND		9.5	4.7	ug/L		06/06/15 07:43	06/11/15 13:43	1
2,4-Dinitrotoluene	ND		4.7	4.7	ug/L		06/06/15 07:43	06/11/15 13:43	1
2,6-Dinitrotoluene	ND		4.7	0.95	ug/L		06/06/15 07:43	06/11/15 13:43	1
2-Chloronaphthalene	ND		4.7	0.86	ug/L		06/06/15 07:43	06/11/15 13:43	1
2-Chlorophenol	**5.4**		4.7	0.62	ug/L		06/06/15 07:43	06/11/15 13:43	1
2-Nitrophenol	ND		4.7	0.66	ug/L		06/06/15 07:43	06/11/15 13:43	1
3,3'-Dichlorobenzidine	ND		4.7	0.78	ug/L		06/06/15 07:43	06/11/15 13:43	1
4,6-Dinitro-2-methylphenol	ND		9.5	0.62	ug/L		06/06/15 07:43	06/11/15 13:43	1
4-Bromophenyl phenyl ether	ND		4.7	1.3	ug/L		06/06/15 07:43	06/11/15 13:43	1
4-Chloro-3-methylphenol	ND		4.7	1.0	ug/L		06/06/15 07:43	06/11/15 13:43	1
4-Chlorophenyl phenyl ether	ND		4.7	1.2	ug/L		06/06/15 07:43	06/11/15 13:43	1
4-Nitrophenol	ND		9.5	9.5	ug/L		06/06/15 07:43	06/11/15 13:43	1
Acenaphthene	ND		4.7	0.77	ug/L		06/06/15 07:43	06/11/15 13:43	1
Acenaphthylene	ND		4.7	0.82	ug/L		06/06/15 07:43	06/11/15 13:43	1
Aniline	**3.8**	**J**	9.5	1.4	ug/L		06/06/15 07:43	06/11/15 13:43	1
Anthracene	ND		4.7	1.3	ug/L		06/06/15 07:43	06/11/15 13:43	1
Benzidine	ND		76	33	ug/L		06/06/15 07:43	06/11/15 13:43	1
Benzo[a]anthracene	ND		4.7	1.0	ug/L		06/06/15 07:43	06/11/15 13:43	1
Benzo[a]pyrene	ND		4.7	1.2	ug/L		06/06/15 07:43	06/11/15 13:43	1
Benzo[b]fluoranthene	ND		4.7	1.1	ug/L		06/06/15 07:43	06/11/15 13:43	1
Benzo[g,h,i]perylene	ND		4.7	1.4	ug/L		06/06/15 07:43	06/11/15 13:43	1
Benzo[k]fluoranthene	ND		4.7	1.2	ug/L		06/06/15 07:43	06/11/15 13:43	1
Bis(2-chloroethoxy)methane	ND		4.7	0.71	ug/L		06/06/15 07:43	06/11/15 13:43	1
Bis(2-chloroethyl)ether	ND		4.7	0.88	ug/L		06/06/15 07:43	06/11/15 13:43	1
Bis(2-ethylhexyl) phthalate	ND		9.5	1.1	ug/L		06/06/15 07:43	06/11/15 13:43	1
Butyl benzyl phthalate	ND		4.7	1.0	ug/L		06/06/15 07:43	06/11/15 13:43	1
Chrysene	ND		4.7	0.95	ug/L		06/06/15 07:43	06/11/15 13:43	1
Decane	ND	*	9.5	1.5	ug/L		06/06/15 07:43	06/11/15 13:43	1
Dibenz(a,h)anthracene	ND		4.7	1.4	ug/L		06/06/15 07:43	06/11/15 13:43	1
Diethyl phthalate	ND		4.7	0.95	ug/L		06/06/15 07:43	06/11/15 13:43	1
Dimethyl phthalate	ND		4.7	0.86	ug/L		06/06/15 07:43	06/11/15 13:43	1
Di-n-butyl phthalate	ND		4.7	1.5	ug/L		06/06/15 07:43	06/11/15 13:43	1
Di-n-octyl phthalate	ND		4.7	1.1	ug/L		06/06/15 07:43	06/11/15 13:43	1
Fluoranthene	ND		4.7	1.5	ug/L		06/06/15 07:43	06/11/15 13:43	1
Fluorene	ND		4.7	0.95	ug/L		06/06/15 07:43	06/11/15 13:43	1
Hexachlorobenzene	ND		4.7	0.95	ug/L		06/06/15 07:43	06/11/15 13:43	1
Hexachlorobutadiene	ND		4.7	0.95	ug/L		06/06/15 07:43	06/11/15 13:43	1
Hexachlorocyclopentadiene	ND		4.7	4.7	ug/L		06/06/15 07:43	06/11/15 13:43	1
Hexachloroethane	ND	*	4.7	0.57	ug/L		06/06/15 07:43	06/11/15 13:43	1
Indeno[1,2,3-cd]pyrene	ND		4.7	1.4	ug/L		06/06/15 07:43	06/11/15 13:43	1

Surrogate Summary

Client: Ontario Specialty Contracting, Inc.
Project/Site: Buffalo Color Area D Annual Influent

TestAmerica Job ID: 480-81496-1

Method: 624 - Volatile Organic Compounds (GC/MS)

Matrix: Water

Prep Type: Total/NA

		Percent Surrogate Recovery (Acceptance Limits)			
		12DCE	BFB	TOL	DBFM
Lab Sample ID	Client Sample ID	(72-130)	(69-121)	(70-123)	(70-130)
480-81496-1	BCC Area D Influent 0615	101	96	105	96
480-81496-1 - DL	BCC Area D Influent 0615	102	96	102	95
LCS 480-246067/6	Lab Control Sample	108	96	103	108
LCS 480-246335/50	Lab Control Sample	99	95	103	97
MB 480-246067/8	Method Blank	105	96	102	98
MB 480-246335/8	Method Blank	105	97	104	101

Surrogate Legend

12DCE = 1,2-Dichloroethane-d4 (Surr)
BFB = 4-Bromofluorobenzene (Surr)
TOL = Toluene-d8 (Surr)
DBFM = Dibromofluoromethane (Surr)

Method: 625 - Semivolatile Organic Compounds (GC/MS)

Matrix: Water

Prep Type: Total/NA

		Percent Surrogate Recovery (Acceptance Limits)					
		TBP	FBP	2FP	NBZ	PHL	TPH
Lab Sample ID	Client Sample ID	(52-151)	(44-120)	(17-120)	(42-120)	(10-120)	(22-125)
480-81496-1	BCC Area D Influent 0615	93	72	35	61	24	53
LCS 480-246569/2-A	Lab Control Sample	86	66	34	54	25	83
MB 480-246569/1-A	Method Blank	86	79	39	66	28	94

Surrogate Legend

TBP = 2,4,6-Tribromophenol
FBP = 2-Fluorobiphenyl
2FP = 2-Fluorophenol
NBZ = Nitrobenzene-d5
PHL = Phenol-d5
TPH = p-Terphenyl-d14

Method: 608 - Polychlorinated Biphenyls (PCBs) (GC)

Matrix: Water

Prep Type: Total/NA

		Percent Surrogate Recovery (Acceptance Limits)	
		DCB1	TCX1
Lab Sample ID	Client Sample ID	(26-135)	(27-159)
480-81496-1	BCC Area D Influent 0615	57	84
LCS 480-246413/2-A	Lab Control Sample	71	89
MB 480-246413/1-A	Method Blank	66	87

Surrogate Legend

DCB = DCB Decachlorobiphenyl
TCX = Tetrachloro-m-xylene

Method: 624 - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCS 480-246067/6
Matrix: Water
Analysis Batch: 246067

Client Sample ID: Lab Control Sample
Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Bromomethane	20.0	23.3		ug/L		117	1 - 242
Carbon tetrachloride	20.0	23.1		ug/L		115	70 - 140
Chlorobenzene	20.0	20.4		ug/L		102	37 - 160
Chloroethane	20.0	21.5		ug/L		107	14 - 230
2-Chloroethyl vinyl ether	20.0	18.6	J	ug/L		93	1 - 305
Chloroform	20.0	22.1		ug/L		111	51 - 138
Chloromethane	20.0	23.1		ug/L		116	1 - 273
Dibromochloromethane	20.0	21.2		ug/L		106	53 - 149
1,1-Dichloroethane	20.0	21.5		ug/L		107	59 - 155
1,2-Dichloroethane	20.0	22.8		ug/L		114	49 - 155
1,1-Dichloroethene	20.0	20.5		ug/L		103	1 - 234
1,2-Dichloropropane	20.0	21.1		ug/L		105	1 - 210
cis-1,3-Dichloropropene	20.0	20.2		ug/L		101	1 - 227
trans-1,3-Dichloropropene	20.0	19.7		ug/L		99	17 - 183
Ethylbenzene	20.0	21.3		ug/L		106	37 - 162
Methylene Chloride	20.0	22.4		ug/L		112	1 - 221
1,1,2,2-Tetrachloroethane	20.0	22.3		ug/L		111	46 - 157
Tetrachloroethene	20.0	20.6		ug/L		103	64 - 148
Toluene	20.0	21.2		ug/L		106	47 - 150
1,1,1-Trichloroethane	20.0	21.9		ug/L		110	52 - 162
1,1,2-Trichloroethane	20.0	21.6		ug/L		108	52 - 150
Trichloroethene	20.0	20.9		ug/L		105	71 - 157
Vinyl chloride	20.0	21.1		ug/L		106	1 - 251
1,2-Dichlorobenzene	20.0	22.1		ug/L		111	18 - 190
1,3-Dichlorobenzene	20.0	21.2		ug/L		106	59 - 156
1,4-Dichlorobenzene	20.0	21.4		ug/L		107	18 - 190
Trichlorofluoromethane	20.0	24.1		ug/L		120	17 - 181

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
1,2-Dichloroethane-d4 (Surr)	*108*		*72 - 130*
4-Bromofluorobenzene (Surr)	*96*		*69 - 121*
Toluene-d8 (Surr)	*103*		*70 - 123*
Dibromofluoromethane (Surr)	*108*		*70 - 130*

Lab Sample ID: MB 480-246335/8
Matrix: Water
Analysis Batch: 246335

Client Sample ID: Method Blank
Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Acrolein	ND		100	17	ug/L			06/04/15 23:17	1
Acrylonitrile	ND		100	1.9	ug/L			06/04/15 23:17	1
Benzene	ND		5.0	0.60	ug/L			06/04/15 23:17	1
Bromodichloromethane	ND		5.0	0.54	ug/L			06/04/15 23:17	1
Bromoform	ND		5.0	0.47	ug/L			06/04/15 23:17	1
Bromomethane	ND		5.0	1.2	ug/L			06/04/15 23:17	1
Carbon tetrachloride	ND		5.0	0.51	ug/L			06/04/15 23:17	1
Chlorobenzene	ND		5.0	0.48	ug/L			06/04/15 23:17	1
Chloroethane	ND		5.0	0.87	ug/L			06/04/15 23:17	1

Method: 624 - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCS 480-246335/50
Matrix: Water
Analysis Batch: 246335

Client Sample ID: Lab Control Sample
Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
1,2-Dichloroethane	20.0	21.9		ug/L		110	49 - 155
1,1-Dichloroethene	20.0	19.5		ug/L		97	1 - 234
1,2-Dichloropropane	20.0	22.8		ug/L		114	1 - 210
cis-1,3-Dichloropropene	20.0	22.9		ug/L		114	1 - 227
trans-1,3-Dichloropropene	20.0	22.2		ug/L		111	17 - 183
Ethylbenzene	20.0	21.7		ug/L		108	37 - 162
Methylene Chloride	20.0	21.1		ug/L		106	1 - 221
1,1,2,2-Tetrachloroethane	20.0	23.4		ug/L		117	46 - 157
Tetrachloroethene	20.0	20.7		ug/L		104	64 - 148
Toluene	20.0	22.3		ug/L		112	47 - 150
1,1,1-Trichloroethane	20.0	19.9		ug/L		100	52 - 162
1,1,2-Trichloroethane	20.0	23.3		ug/L		117	52 - 150
Trichloroethene	20.0	21.5		ug/L		108	71 - 157
Vinyl chloride	20.0	21.0		ug/L		105	1 - 251
1,2-Dichlorobenzene	20.0	23.1		ug/L		115	18 - 190
1,3-Dichlorobenzene	20.0	22.2		ug/L		111	59 - 156
1,4-Dichlorobenzene	20.0	22.3		ug/L		112	18 - 190
Trichlorofluoromethane	20.0	20.5		ug/L		103	17 - 181

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
1,2-Dichloroethane-d4 (Surr)	*99*		*72 - 130*
4-Bromofluorobenzene (Surr)	*95*		*69 - 121*
Toluene-d8 (Surr)	*103*		*70 - 123*
Dibromofluoromethane (Surr)	*97*		*70 - 130*

Method: 625 - Semivolatile Organic Compounds (GC/MS)

Lab Sample ID: MB 480-246569/1-A
Matrix: Water
Analysis Batch: 247501

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 246569

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
1,2,4-Trichlorobenzene	ND		10	0.82	ug/L		06/06/15 07:43	06/11/15 11:06	1
1,2-Dichlorobenzene	ND		10	5.0	ug/L		06/06/15 07:43	06/11/15 11:06	1
1,2-Diphenylhydrazine	ND		10	0.78	ug/L		06/06/15 07:43	06/11/15 11:06	1
1,3-Dichlorobenzene	ND		10	0.69	ug/L		06/06/15 07:43	06/11/15 11:06	1
1,4-Dichlorobenzene	ND		10	5.0	ug/L		06/06/15 07:43	06/11/15 11:06	1
2,2'-oxybis[1-chloropropane]	ND		5.0	0.84	ug/L		06/06/15 07:43	06/11/15 11:06	1
2,4,6-Trichlorophenol	ND		5.0	1.0	ug/L		06/06/15 07:43	06/11/15 11:06	1
2,4-Dichlorophenol	ND		5.0	0.77	ug/L		06/06/15 07:43	06/11/15 11:06	1
2,4-Dimethylphenol	ND		5.0	1.4	ug/L		06/06/15 07:43	06/11/15 11:06	1
2,4-Dinitrophenol	ND		10	5.0	ug/L		06/06/15 07:43	06/11/15 11:06	1
2,4-Dinitrotoluene	ND		5.0	5.0	ug/L		06/06/15 07:43	06/11/15 11:06	1
2,6-Dinitrotoluene	ND		5.0	1.0	ug/L		06/06/15 07:43	06/11/15 11:06	1
2-Chloronaphthalene	ND		5.0	0.91	ug/L		06/06/15 07:43	06/11/15 11:06	1
2-Chlorophenol	ND		5.0	0.66	ug/L		06/06/15 07:43	06/11/15 11:06	1
2-Nitrophenol	ND		5.0	0.70	ug/L		06/06/15 07:43	06/11/15 11:06	1
3,3'-Dichlorobenzidine	ND		5.0	0.82	ug/L		06/06/15 07:43	06/11/15 11:06	1

Method: 625 - Semivolatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: MB 480-246569/1-A
Matrix: Water
Analysis Batch: 247501

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 246569

Surrogate	MB %Recovery	MB Qualifier	Limits	Prepared	Analyzed	Dil Fac
2-Fluorophenol	39		17 - 120	06/06/15 07:43	06/11/15 11:06	1
Nitrobenzene-d5	66		42 - 120	06/06/15 07:43	06/11/15 11:06	1
Phenol-d5	28		10 - 120	06/06/15 07:43	06/11/15 11:06	1
p-Terphenyl-d14	94		22 - 125	06/06/15 07:43	06/11/15 11:06	1

Lab Sample ID: LCS 480-246569/2-A
Matrix: Water
Analysis Batch: 247501

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 246569

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
1,2,4-Trichlorobenzene	50.0	20.9	*	ug/L		42	44 - 142
1,2-Dichlorobenzene	50.0	18.5		ug/L		37	32 - 129
1,3-Dichlorobenzene	50.0	16.3		ug/L		33	1 - 172
1,4-Dichlorobenzene	50.0	17.3		ug/L		35	20 - 124
2,2'-oxybis[1-chloropropane]	50.0	25.8		ug/L		52	36 - 166
2,4,6-Trichlorophenol	50.0	39.4		ug/L		79	37 - 144
2,4-Dichlorophenol	50.0	34.1		ug/L		68	39 - 135
2,4-Dimethylphenol	50.0	34.8		ug/L		70	32 - 119
2,4-Dinitrophenol	100	102		ug/L		102	1 - 191
2,4-Dinitrotoluene	50.0	41.8		ug/L		84	39 - 139
2,6-Dinitrotoluene	50.0	43.4		ug/L		87	50 - 158
2-Chloronaphthalene	50.0	29.8		ug/L		60	60 - 118
2-Chlorophenol	50.0	26.9		ug/L		54	23 - 134
2-Nitrophenol	50.0	31.5		ug/L		63	29 - 182
3,3'-Dichlorobenzidine	100	74.0		ug/L		74	1 - 262
4,6-Dinitro-2-methylphenol	100	102		ug/L		102	1 - 181
4-Bromophenyl phenyl ether	50.0	39.5		ug/L		79	53 - 127
4-Chloro-3-methylphenol	50.0	38.9		ug/L		78	22 - 147
4-Chlorophenyl phenyl ether	50.0	37.8		ug/L		76	25 - 158
4-Nitrophenol	100	44.7		ug/L		45	1 - 132
Acenaphthene	50.0	36.2		ug/L		72	47 - 145
Acenaphthylene	50.0	35.9		ug/L		72	33 - 145
Aniline	50.0	27.3		ug/L		55	40 - 120
Anthracene	50.0	42.5		ug/L		85	27 - 133
Benzo[a]anthracene	50.0	43.7		ug/L		87	33 - 143
Benzo[a]pyrene	50.0	42.1		ug/L		84	17 - 163
Benzo[b]fluoranthene	50.0	41.3		ug/L		83	24 - 159
Benzo[g,h,i]perylene	50.0	41.1		ug/L		82	1 - 219
Benzo[k]fluoranthene	50.0	44.0		ug/L		88	11 - 162
Bis(2-chloroethoxy)methane	50.0	32.2		ug/L		64	33 - 184
Bis(2-chloroethyl)ether	50.0	27.3		ug/L		55	12 - 158
Bis(2-ethylhexyl) phthalate	50.0	43.5		ug/L		87	8 - 158
Butyl benzyl phthalate	50.0	42.7		ug/L		85	1 - 152
Chrysene	50.0	42.2		ug/L		84	17 - 168
Decane	50.0	11.2	*	ug/L		22	70 - 130
Dibenz(a,h)anthracene	50.0	39.5		ug/L		79	1 - 227
Diethyl phthalate	50.0	41.4		ug/L		83	1 - 114
Dimethyl phthalate	50.0	40.1		ug/L		80	1 - 112

Method: 608 - Polychlorinated Biphenyls (PCBs) (GC) (Continued)

Lab Sample ID: LCS 480-246413/2-A
Matrix: Water
Analysis Batch: 246547

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 246413

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
PCB-1016	1.00	1.03		ug/L		103	40 - 142
PCB-1260	1.00	0.934		ug/L		93	67 - 148

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
DCB Decachlorobiphenyl	*71*		*26 - 135*
Tetrachloro-m-xylene	*89*		*27 - 159*

Method: 200.7 Rev 4.4 - Metals (ICP)

Lab Sample ID: MB 480-246263/1-A
Matrix: Water
Analysis Batch: 246704

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 246263

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Chromium	ND		0.0040	0.0010	mg/L		06/05/15 08:10	06/05/15 17:10	1
Copper	ND		0.010	0.0016	mg/L		06/05/15 08:10	06/05/15 17:10	1
Lead	ND		0.0050	0.0030	mg/L		06/05/15 08:10	06/05/15 17:10	1
Nickel	ND		0.010	0.0013	mg/L		06/05/15 08:10	06/05/15 17:10	1
Zinc	ND		0.010	0.0015	mg/L		06/05/15 08:10	06/05/15 17:10	1

Lab Sample ID: LCS 480-246263/2-A
Matrix: Water
Analysis Batch: 246704

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 246263

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Chromium	0.200	0.209		mg/L		105	85 - 115
Copper	0.200	0.207		mg/L		104	85 - 115
Lead	0.200	0.197		mg/L		99	85 - 115
Nickel	0.200	0.203		mg/L		102	85 - 115
Zinc	0.200	0.211		mg/L		105	85 - 115

Method: 245.1 - Mercury (CVAA)

Lab Sample ID: MB 480-246940/1-A
Matrix: Water
Analysis Batch: 247082

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 246940

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	ND		0.00020	0.00012	mg/L		06/09/15 09:15	06/09/15 13:04	1

Lab Sample ID: LCS 480-246940/2-A
Matrix: Water
Analysis Batch: 247082

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 246940

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Mercury	0.00667	0.00640		mg/L		96	85 - 115

QC Association Summary

Client: Ontario Specialty Contracting, Inc.
Project/Site: Buffalo Color Area D Annual Influent

TestAmerica Job ID: 480-81496-1

GC/MS VOA

Analysis Batch: 246067

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-81496-1	BCC Area D Influent 0615	Total/NA	Water	624	
LCS 480-246067/6	Lab Control Sample	Total/NA	Water	624	
MB 480-246067/8	Method Blank	Total/NA	Water	624	

Analysis Batch: 246335

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-81496-1 - DL	BCC Area D Influent 0615	Total/NA	Water	624	
LCS 480-246335/50	Lab Control Sample	Total/NA	Water	624	
MB 480-246335/8	Method Blank	Total/NA	Water	624	

GC/MS Semi VOA

Prep Batch: 246569

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-81496-1	BCC Area D Influent 0615	Total/NA	Water	625	
LCS 480-246569/2-A	Lab Control Sample	Total/NA	Water	625	
MB 480-246569/1-A	Method Blank	Total/NA	Water	625	

Analysis Batch: 247501

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-81496-1	BCC Area D Influent 0615	Total/NA	Water	625	246569
LCS 480-246569/2-A	Lab Control Sample	Total/NA	Water	625	246569
MB 480-246569/1-A	Method Blank	Total/NA	Water	625	246569

GC Semi VOA

Prep Batch: 246413

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-81496-1	BCC Area D Influent 0615	Total/NA	Water	3510C	
LCS 480-246413/2-A	Lab Control Sample	Total/NA	Water	3510C	
MB 480-246413/1-A	Method Blank	Total/NA	Water	3510C	

Analysis Batch: 246547

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-81496-1	BCC Area D Influent 0615	Total/NA	Water	608	246413
LCS 480-246413/2-A	Lab Control Sample	Total/NA	Water	608	246413
MB 480-246413/1-A	Method Blank	Total/NA	Water	608	246413

Metals

Prep Batch: 246263

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-81496-1	BCC Area D Influent 0615	Total/NA	Water	200.7	
LCS 480-246263/2-A	Lab Control Sample	Total/NA	Water	200.7	
MB 480-246263/1-A	Method Blank	Total/NA	Water	200.7	

Analysis Batch: 246704

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-81496-1	BCC Area D Influent 0615	Total/NA	Water	200.7 Rev 4.4	246263
LCS 480-246263/2-A	Lab Control Sample	Total/NA	Water	200.7 Rev 4.4	246263

Lab Chronicle

Client: Ontario Specialty Contracting, Inc.
Project/Site: Buffalo Color Area D Annual Influent

TestAmerica Job ID: 480-81496-1

Client Sample ID: BCC Area D Influent 0615

Date Collected: 06/03/15 09:00
Date Received: 06/03/15 15:45

Lab Sample ID: 480-81496-1

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	624		10	246067	06/04/15 09:20	LCH	TAL BUF
Total/NA	Analysis	624	DL	40	246335	06/05/15 09:56	LCH	TAL BUF
Total/NA	Prep	625			246569	06/06/15 07:43	RMZ	TAL BUF
Total/NA	Analysis	625		1	247501	06/11/15 13:43	DMR	TAL BUF
Total/NA	Prep	3510C			246413	06/05/15 08:35	MCZ	TAL BUF
Total/NA	Analysis	608		1	246547	06/05/15 22:39	KS	TAL BUF
Total/NA	Prep	200.7			246263	06/05/15 08:10	KJ1	TAL BUF
Total/NA	Analysis	200.7 Rev 4.4		1	246704	06/05/15 18:34	AMH	TAL BUF
Total/NA	Prep	245.1			246940	06/09/15 09:15	LRK	TAL BUF
Total/NA	Analysis	245.1		1	247082	06/09/15 13:42	LRK	TAL BUF
Total/NA	Prep	Distill/Phenol			247050	06/09/15 13:07	GMG	TAL BUF
Total/NA	Analysis	420.1		1	247295	06/10/15 07:55	EKB	TAL BUF
Total/NA	Analysis	SM 4500 CN G		1	248136	06/15/15 15:49	KMF	TAL BUF
Total/NA	Analysis	SM 4500 P E		1	246674	06/07/15 12:48	DLG	TAL BUF

Laboratory References:

TAL BUF = TestAmerica Buffalo, 10 Hazelwood Drive, Amherst, NY 14228-2298, TEL (716)691-2600

Method Summary

Client: Ontario Specialty Contracting, Inc.
Project/Site: Buffalo Color Area D Annual Influent

TestAmerica Job ID: 480-81496-1

Method	Method Description	Protocol	Laboratory
624	Volatile Organic Compounds (GC/MS)	40CFR136A	TAL BUF
625	Semivolatile Organic Compounds (GC/MS)	40CFR136A	TAL BUF
608	Polychlorinated Biphenyls (PCBs) (GC)	40CFR136A	TAL BUF
200.7 Rev 4.4	Metals (ICP)	EPA	TAL BUF
245.1	Mercury (CVAA)	EPA	TAL BUF
420.1	Phenolics, Total Recoverable	MCAWW	TAL BUF
SM 4500 CN G	Cyanide, Amenable	SM	TAL BUF
SM 4500 P E	Phosphorus	SM	TAL BUF

Protocol References:

40CFR136A = "Methods for Organic Chemical Analysis of Municipal Industrial Wastewater", 40CFR, Part 136, Appendix A, October 26, 1984 and subsequent revisions.
EPA = US Environmental Protection Agency
MCAWW = "Methods For Chemical Analysis Of Water And Wastes", EPA-600/4-79-020, March 1983 And Subsequent Revisions.
SM = "Standard Methods For The Examination Of Water And Wastewater",

Laboratory References:

TAL BUF = TestAmerica Buffalo, 10 Hazelwood Drive, Amherst, NY 14228-2298, TEL (716)691-2600

Detection Limit Exceptions Summary

Client: Ontario Specialty Contracting, Inc.
Project/Site: Buffalo Color Area D Annual Influent

TestAmerica Job ID: 480-81496-1

The requested project specific reporting limits listed below were less than laboratory standard quantitation limits (PQL) but great than or equal to the laboratory method detection limits (MDL). It must be noted that results reported below lab standard quantitation limits may result in false positive/false negative values and less accurate quantitation. Routine laboratory procedure do not indicate corrective action for detections below the laboratory's PQL.

Method	Matrix	Analyte	Units	Client RL	Lab PQL
625	Water	4-Nitrophenol	ug/L	10	15
625	Water	Hexachlorocyclopentadiene	ug/L	5.0	10

Login Sample Receipt Checklist

Client: Ontario Specialty Contracting, Inc.

Job Number: 480-81496-1

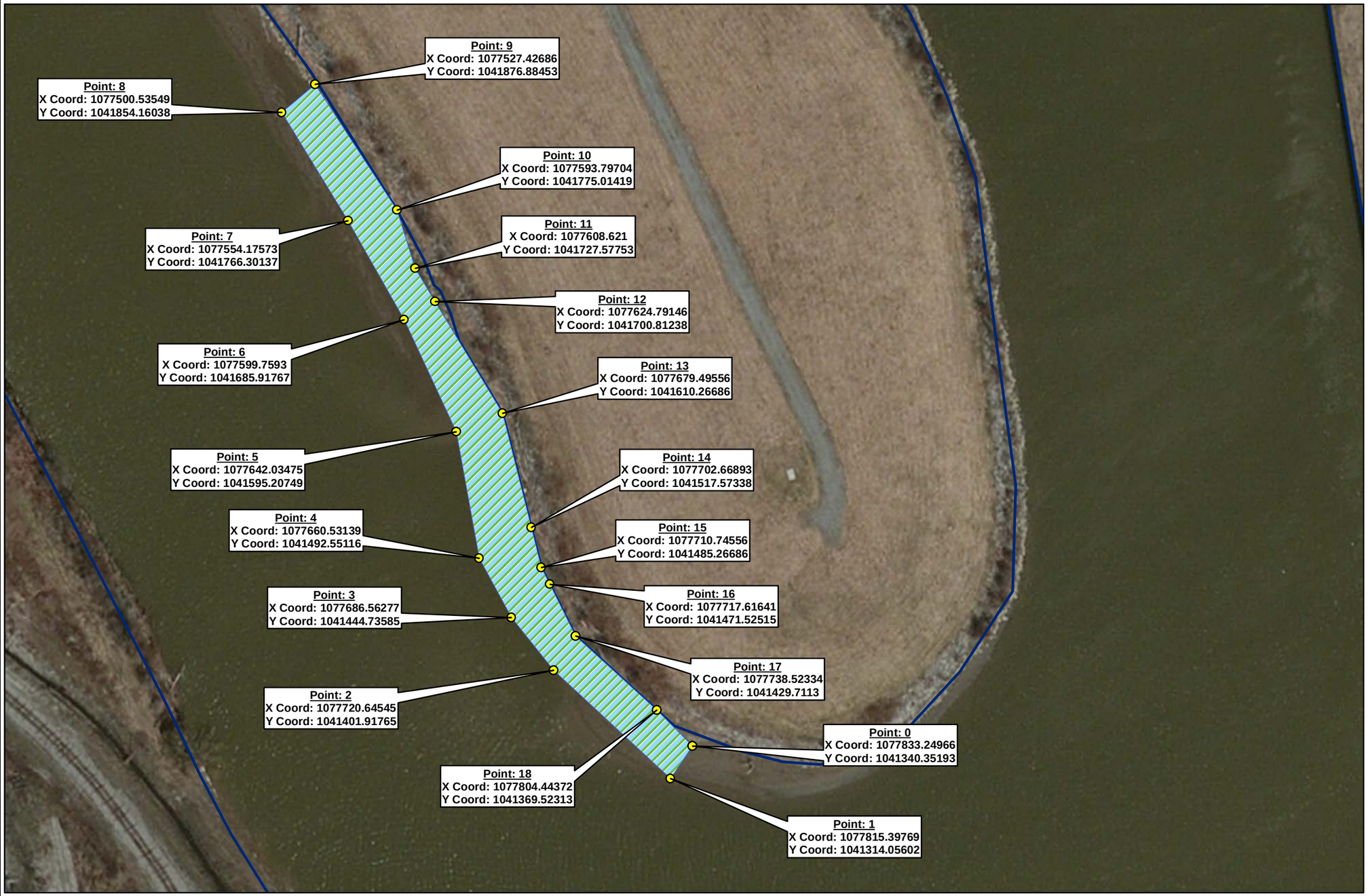
Login Number: 81496
List Number: 1
Creator: Kolb, Chris M

List Source: TestAmerica Buffalo

Question	Answer	Comment
Radioactivity either was not measured or, if measured, is at or below background	True	
The cooler's custody seal, if present, is intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the sample IDs on the containers and the COC.	True	
Samples are received within Holding Time.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
VOA sample vials do not have headspace or bubble is <6mm (1/4") in diameter.	True	
If necessary, staff have been informed of any short hold time or quick TAT needs	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Sampling Company provided.	True	OSC
Samples received within 48 hours of sampling.	True	
Samples requiring field filtration have been filtered in the field.	True	
Chlorine Residual checked.	True	Yes: Samples checked, no residual chlorine detected

ATTACHMENT H

BATHYMETRIC SURVEY



Legend

- Vertices Coordinates
- Buffalo River Area of Concern
- Approximate Sediment Cap Area

Coordinates: NAD 83 New York State Plane West (feet)

0 45 90 180
Feet

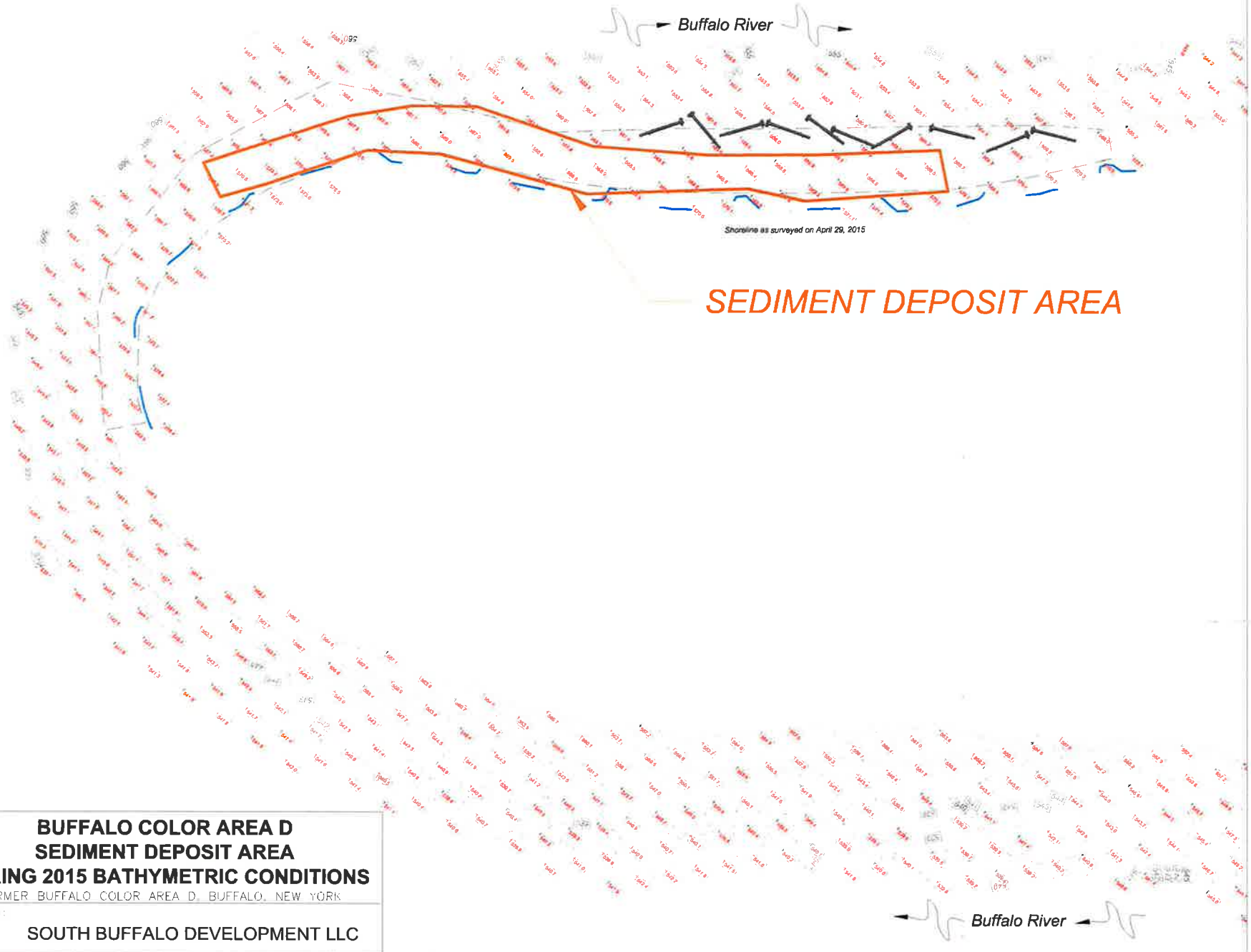
N

ENVIRON
MACTEC

APPROXIMATE SEDIMENT CAP AREA
NAD 83 NEW YORK STATE PLANE WEST (FEET)
BUFFALO RIVER

Figure
1

Drafter: B. Radakovich
Contract Number:
File Name: 20130517_SedimentCap.mxd



Title:

BUFFALO COLOR AREA D
SEDIMENT DEPOSIT AREA
SPRING 2015 BATHYMETRIC CONDITIONS

FORMER BUFFALO COLOR AREA D, BUFFALO, NEW YORK

Prepared For:

SOUTH BUFFALO DEVELOPMENT LLC

OSC

Compiled by: OSC	Date: 5/28/2015
Prepared by: OSC	Scale: AS SHOWN
Project Mgr: PM	Project: AREA D SDA
File: BCC_OMM AREA D SDA SURVEY	

FIGURE 1

100' 0 100'

NOTE: Bathymetric survey performed by Thew Associates on April 29, 2015 (Project No. Ck3566-07-14).