

PERIODIC REVIEW REPORT

For

300-320 SCAJ LLC
5102 Donnington Road
Clarence, New York

Site

Saginaw – Buffalo Site
Site Number 915152
320 Scajaquada Street
Buffalo, New York

Dates Covered by Report
May 4, 2022 to August 31, 2023

Prepared by:



10 Jones Avenue
Rochester, New York 14608
585-313-9683

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Section 1

NEU-VELLE LLC

Summary

1.0 Summary

NEU-VELLE LLC (NEU-VELLE) has prepared this Site Management (SM) Periodic Review Report (PRR) for the Saginaw-Buffalo Site (Site) located at 320 Scjacuada Street in the City of Buffalo, Erie County. The Site is defined as the former Parking Lot #4 associated with the former General Motors and American Axle & Manufacturing (AAM) facility that manufactured axles and drive-train components for cars and trucks. The Site covers an area of approximately 7.248 acres (SBL Parcel No. 101.24-1-3.1) and is included in the New York Registry of Inactive Hazardous Waste Sites (Site No. 915152). Site Institutional Controls (ICs) and Engineering Controls (ECs) were adhered to over the PRR reporting period and continue to be effective in maintaining the remedial objectives. No changes to the established SMP or recommended during the next PRR reporting period.

1.1 Site Summary

General Motors (GM) purchased several parcels in the mid-1960s and constructed Parking Lot #4 which is the current listed Site. In 1989 during a spill cleanup of industrial oil by GM, excavated soil was found to contain Polychlorinated Biphenyls (PCBs). The Site was sold to AAM in 1994 along with the main facility west of the railroad right of way. As part of this conveyance, a deed restriction was placed on the property limiting it for use for industrial purposes only. GM-Saginaw Division, the previous owner of the Site, entered into a Consent Order in 1995 and a Final Site Investigation Report and Engineering Evaluation Report of Alternatives was completed in 1997. A Record of Decision (ROD) was issued in March 1998 which required: 1) The further removal of PCB contaminated soil, water and oil; 2) Maintenance of the pavement to reduce infiltration and provided a barrier to lead contaminated soil; and 3) Long-term monitoring and maintenance. Remediation (the “removal of PCB contaminated soil, water and oil”) of the Site was completed in 1998 and a long-term operation and maintenance (O&M) plan is in place. The property was sold to East Delavan Property, LLC in October 2008.

The paved portion of the Site is currently utilized periodically by the City of Buffalo for training school bus drivers. There remainder of the Site is vacant. The property was

purchased by 300-320 SCAJ LLC on February 9, 2023. In addition, the monitoring wells were re-surveyed by the previous consultant in November 2022.

1.2 Effectiveness of the Remedial Program

Remediation of the Site was completed between 1998 and 2000 and included:

- Dewatering of an approximately 1-acre area surrounding the former Wastewater Treatment Plant and on-site water treatment, confirmatory effluent sampling and analysis, and batch discharge to the Buffalo Sewer Authority (BSA) sanitary sewer system;
- Excavating fill/soil containing greater than the site cleanup goal of 10 parts per million (ppm) PCBs in the OU1 area, and confirmatory sampling;
- Transporting excavated materials off-site for treatment and disposal;
- Backfilling of the OU1 excavation with clay soil; and
- Paving the excavation area (OU1) and repaving of the OU2 area which was the remainder of the Parking Lot No. 4.

The remedial program was effective and long-term site monitoring requirements were established requiring:

- Pavement inspection and maintenance conducted on an annual basis to ensure that the integrity of the asphalt surface has been maintained;
- Visual inspection of storm sewer manhole covers and manhole risers for structural damage;
- Groundwater sampling of Site monitoring wells for PCBs, Total Lead, and Soluble Lead; and
- Storm sewer sampling from Manhole #2 for PCBs and Total Lead.

Groundwater sampling has been conducted on a biennial basis since 2008 and storm sewer sampling (Manhole #2) on an annual basis.

A requirement for the collection of groundwater samples for per and polyfluoroalkyl substances (PFAS) and 1,4-Dioxane at monitoring wells MW-204 (PFAS only), MW-211, and MW-202 were added to the biennial program in March 2021. The next biennial Groundwater sampling will be conducted in October 2023 and included in the subsequent PRR (2024).

Pavement inspection, storm sewer visual inspection, and storm sewer sampling is conducted on an annual basis.

1.2.1 Progress During the Reporting Period

The cover system is intact and functioning as intended. NEU-VELLE conducted the annual inspection in August 2023 and completed the required inspection form (Appendix A). Photographs of the inspection are included in Appendix A. During this reporting period the property was purchased by 300-320 SCAJ LLC on February 9, 2023. In addition, the monitoring wells were re-surveyed by the previous consultant in November 2022.

Biennial groundwater sampling was completed in November 2021 (next sampling to be conducted in October 2023). A tabular summary of groundwater and storm sewer sampling results was provided in the previous PRR.

The annual storm sewer sampling from Manhole #2 was conducted in Augst 2023. Samples were collected for PCB and Total Lead analysis. A summary of the storm sewer results is provided in Appendix B. No sediment was observed within the manholes during the sampling event and therefore, no sediment samples were collected.

No groundwater use, change of use, or excavations occurred onsite during the reporting period.

The EQuIS formatted EDD from the August 2023 annual storm sewer sampling was submitted to the NYSDEC on September 25, 2023. The laboratory report is provided as Appendix C.

1.2.2 Progress to Remedial Objectives for the Site

The Remedial Objectives (ROs) for the Site as established in the March 1998 Record of Decision (ROD) have been achieved and the Site has been in long-term monitoring since 2002. The ROs were as follows:

- To the extent practicable, reduce the potential for human contact with PCBs and lead impacted soils;
- Prevent or greatly reduce the potential for migration of contaminants via surface run-off and on-site drain lines;
- Prevent, to the extent practicable, migration of contaminants at the site to the Scajaquada Creek Drain; and
- To the extent practicable, provide for attainment of SCGs in groundwater.

1.3 Compliance

There were no areas of potential non-compliance identified during the reporting period.

1.4 Recommendations

There are no recommended changes to the SMP at this time.

Section 2

NEU-VELLE LLC

Site Overview

2.0 Site Overview

2.1 Site Location

The Site is located at 320 Scjacuada Street in the City of Buffalo, Erie County. The Site is defined as the former Parking Lot #4 associated with the former General Motors and American Axle & Manufacturing (AAM) facility that manufactured axles and drive-train components for cars and trucks. The Site covers an area of approximately 7.248 acres and is included in the New York Registry of Inactive Hazardous Waste Sites (Site No. 915152). Currently the site is used for bus driver training and consists of an asphalt parking area. In addition, the site houses a decommissioned wastewater treatment facility which is scheduled for demolition/removal.

2.2 Chronology of the Remedial Program

GM and NYSDEC entered on Order on Consent (Index #B9-0410-92-09), effective February 2, 1995, pursuant to which GM performed an Interim Remedial Measure (IRM) at OU1 and conducted a Site Investigation and Engineering Evaluation of Alternatives in both OU1 and OU2. Based upon the Engineering Evaluation of Alternatives Report prepared by Wehran-New York, Inc. (ENCOR), NYSDEC prepared a Proposed Remedial Action Plan, which it submitted for public comment in February 1998.

NYSDEC selected a final remedial alternative for the Site in a ROD that was issued in March 1998. A Remedial Design (RD) Report was prepared by EMCON to implement the ROD-selected remedial alternatives at the Site. The RD Report was approved by the NYSDEC, and remedial activities were conducted between July 1998 and March 2000.

Section 3

NEU-VELLE LLC

Remedy Performance, Effectiveness, and Protectiveness

3.0 Remedy Performance, Effectiveness, and Protectiveness

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

- The pavement and structural integrity of the sewer system remain in good condition at the Site based on a visual evaluation. The next annual inspection will be conducted in June 2024
- Groundwater samples in accordance with the O&M plan will be collected in October 2023. In addition to routine biennial sampling for PCBs, Total Lead, and Soluble Lead, MW-204 will also be sampled for PFAS and MW-211 and MW-202 will also be sampled for PFAS and 1,4-Dioxane.
- Sewer samples in accordance with the O&M plan will be collected in June 2024.

Section 4

NEU-VELLE LLC

IC/EC Plan Compliance Report

4.0 IC/EC Plan Compliance Report

4.1 IC/EC Requirements and Compliance

A series of IC's have been developed and are being adhered to at the Site and include:

- Inspection and maintenance of Parking Lot #4.
- Groundwater and sewer monitoring in accordance with the April 2001 O&M
- Manual and subsequent modifications to the O&M Manual in January 2004 and September 2008.

4.1.1 Controls

Engineering controls (ECs) developed for the Site consist of an asphalt pavement cover system.

4.1.2 Status

The Site IC/ECs are all currently active and in force.

4.1.3 Corrective Measures

There are no corrective measures proposed at this time.

4.2 IC/EC Certification

The IC/EC certifications are provided in Enclosure A.

Section 5

NEU-VELLE LLC

Monitoring Plan Compliance Report

5.0 Monitoring Plan Compliance Report

5.1 Monitoring Plan Compliance Report

Routine Site Monitoring includes annual pavement inspection, annual visual inspection of sewer structure integrity, annual storm sewer sample collection, biennial groundwater sample collection, and periodic certification.

5.2 Monitoring Completed During Reporting Period

NEU-VELLE conducted the annual inspection August 2023 and completed the required inspection form (Appendix A). The cover system remains in good condition.

Groundwater sampling for PCBs, Total Lead, and Soluble Lead was conducted in November 2021. Sampling for PFAS and 1,4-Dioxane was conducted at select monitoring wells.

Storm sewer sampling from Manhole #2 for PCBs and Total Lead was conducted in August 2023. A summary of the storm sewer results is provided in Table 2 of Appendix B.

Laboratory analytical results for samples collected during the reporting period are provided in Appendix C and the EDDs formatted for the NYSDEC Environmental Information Management System (EIMS) were submitted to the NYSDEC database on September 25, 2023.

There were no emergencies or unforeseen failures of established ECs that would require non-routine inspections.

5.3 Monitoring Deficiencies

No monitoring deficiencies were noted during the reporting period.

5.4 Conclusions and Recommendations for Changes

There are no recommendations for changes at this time.

Section 6

NEU-VELLE LLC

Operation & Maintenance (O&M) Plan Compliance Report

6.0 Operation & Maintenance (O&M) Plan Compliance Report

The Site remedy does not rely on any mechanical systems to protect public health and the environment; therefore, an O&M Plan Compliance Report is not applicable to this PRR.

Section 7

NEU-VELLE LLC

Overall PRR Conclusions and Recommendations

7.0 Overall PRR Conclusions and Recommendations

Site IC/ECs remain in place and effective in maintaining the remedial objectives. No changes to the established SMP are recommended during the next PRR reporting period.

Appendix A

NEU-VELLE LLC

Annual Site Wide Inspection Forms and Photographs

ANNUAL INSPECTION FORM

Inspection Date: 8/23/23

Inspected By: Albert G. Lyons, Jr. (NEU-VELLE LLC)

PAVEMENT (Identify any damaged areas on site sketch)

- | | | |
|------------------|---------------|-------------|
| 1. Cracked Areas | Yes _____ | No <u>x</u> |
| 2. Settled Areas | Yes _____ | No <u>x</u> |
| 3. Potholes | Yes _____ | No <u>x</u> |
| 4. Heaving | Yes _____ | No <u>x</u> |
| 5. Plow Damage | Yes _____ | No <u>x</u> |
| 6. Drainage | Good <u>x</u> | Poor _____ |

Explain:

7. Condition of Surface Sealing Good x Poor

Explain: Surface is in good shape. No deep fissures in sealant. Photos collected.

STORM SEWERS

1. Condition of Manhole Risers Good x Poor

Explain:

2. Sediment in Main None x Avg (1-4") Avg (>4")

Comments: No sediment visible in MH #1 or MH#2. Very low flow.

MONITORING WELLS

[illegible]

Appendix A – Annual Inspection Photolog

Annual Inspection 2022-2023 PRR	Photo Date: August 2023	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 1		
Direction Photo Taken: Looking North		
Description: Typical. Pavement in good condition.		
Annual Inspection 2022-2023 PRR	Photo Date: August 2023	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 2		
Direction Photo Taken: Looking southwest.		
Description: Typical. Pavement in good condition.		

Appendix A – Annual Inspection Photolog

Annual Inspection 2022-2023 PRR	Photo Date: August 2023	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 1 Direction Photo Taken: Looking east		
Description: Typical. Pavement in good condition.		
Annual Inspection 2022-2023 PRR	Photo Date: August 2023	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 2 Direction Photo Taken: Looking south.		
Description: Typical. Pavement in good condition.		

Appendix A – Annual Inspection Photolog

Annual Inspection 2022-2023 PRR	Photo Date: August 2023	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 1		
Direction Photo Taken: Looking west		
Description: Typical. Pavement in good condition.		
Annual Inspection 2022-2023 PRR	Photo Date: August 2023	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 2		
Direction Photo Taken: Looking south.		
Description: Typical. Pavement in good condition.		

Appendix B

NEU-VELLE LLC

Annual Storm Sewer Sampling Summary

**Annual Storm Sewer Sampling
Saginaw Site (Site #915152)
August 2023**

SMP Constituents

Sample Location: MH-2
Sample Date: 8/23/23

Constituent	Result
Metals (ug/L)	
Lead (Total)	39J
PCBs (ug/L)	
PCB - 1016	U<0.5
PCB - 1221	U<1.0
PCB - 1232	U<0.5
PCB - 1242	U<0.5
PCB - 1248	U<0.5
PCB - 1254	U<0.5
PCB - 1260	U<0.5

U: Analyte not detected above reporting limit shown
J: Estimated value

Appendix C

NEU-VELLE LLC

Laboratory Report



August 31, 2023

Service Request No:R2307578

Al Lyons
Neu-Velle LLC
10 Jones Avenue
Rochester, NY 14608

Laboratory Results for: Saginaw-Buffalo

Dear Al,

Enclosed are the results of the sample(s) submitted to our laboratory August 18, 2023
For your reference, these analyses have been assigned our service request number **R2307578**.

All testing was performed according to our laboratory's quality assurance program and met the requirements of the TNI standards except as noted in the case narrative report. Any testing not included in the lab's accreditation is identified on a Non-Certified Analytes report. All results are intended to be considered in their entirety. ALS Environmental is not responsible for use of less than the complete report. Results apply only to the individual samples submitted to the lab for analysis, as listed in the report. The measurement uncertainty of the results included in this report is within that expected when using the prescribed method(s), and represented by Laboratory Control Sample control limits. Any events, such as QC failures or Holding Time exceedances, which may add to the uncertainty are explained in the report narrative or are flagged with qualifiers. The flags are explained in the Report Qualifiers and Definitions page of this report.

Please contact me if you have any questions. My extension is 7475. You may also contact me via email at Meghan.Pedro@alsglobal.com.

Respectfully submitted,

ALS Group USA, Corp. dba ALS Environmental

Meghan Pedro
Project Manager

ADDRESS

1565 Jefferson Road, Building 300, Suite 360, Rochester, NY 14623

PHONE +1 585 288 5380 | **FAX** +1 585 288 8475

ALS Group USA, Corp.
dba ALS Environmental



Narrative Documents

ALS Environmental—Rochester Laboratory
1565 Jefferson Road, Building 300, Suite 360, Rochester, NY 14623
Phone (585) 288-5380 Fax (585) 288-8475
www.alsglobal.com



Client: Neu-Velle LLC
Project: Saginaw-Buffalo
Sample Matrix: Water

Service Request: R2307578
Date Received: 08/18/2023

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of ALS Environmental. This report contains analytical results for samples for the Tier level IV requested by the client.

Sample Receipt:

One water sample was received for analysis at ALS Environmental on 08/18/2023. Any discrepancies upon initial sample inspection are annotated on the sample receipt and preservation form included within this report. The samples were stored at minimum in accordance with the analytical method requirements.

Semivolatile GC:

Method 8082A, 08/28/2023: The upper control limit was exceeded for one or more analytes in the Continuing Calibration Verification (CCV). The field samples analyzed in this sequence did not contain the analyte(s) in question above the Method Reporting Limit (MRL). Since the exceedance equates to a potential high bias, the data quality was not significantly affected and no further corrective action was taken.

Method 8082A, 815673s: The control limits were exceeded for one or more surrogates due to matrix interferences. Due to the presence of non-target background components that prevented adequate resolution of the surrogate, accurate quantitation was not possible. No further corrective action was appropriate.

Metals:

No significant anomalies were noted with this analysis.

Approved by Meghan Pedro

Date 08/31/2023



Sample Receipt Information

ALS Environmental—Rochester Laboratory

1565 Jefferson Road, Building 300, Suite 360, Rochester, NY 14623

Phone (585) 288-5380 Fax (585) 288-8475

www.alsglobal.com

Client: Neu-Velle LLC
Project: Saginaw-Buffalo

Service Request:R2307578

SAMPLE CROSS-REFERENCE

<u>SAMPLE #</u>	<u>CLIENT SAMPLE ID</u>	<u>DATE</u>	<u>TIME</u>
R2307578-001	MH-2-081823	8/18/2023	0915



al.com

1

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Cooler Receipt and Preservation Check Form

R2307578

Neu-Velle LLC
Saginaw-Buffalo

5



Project/Client Neu-Velle Folder Number _____

Cooler received on 8/18/23 by: MM

COURIER: ALS UPS FEDEX VELOCITY CLIENT

1	Were Custody seals on outside of cooler?	Y <u>N</u>
2	Custody papers properly completed (ink, signed)?	Y <u>N</u>
3	Did all bottles arrive in good condition (unbroken)?	Y <u>N</u>
4	Circle: <u>Wet Ice</u> Dry Ice Gel packs present?	Y <u>N</u>

5a	Perchlorate samples have required headspace?	Y N <u>NA</u>
5b	Did VOA vials, Alk, or Sulfide have sig* bubbles?	Y N <u>NA</u>
6	Where did the bottles originate?	<u>ALS/ROC</u> CLIENT
7	Soil VOA received as: Bulk Encore 5035set	<u>NA</u>

8. Temperature Readings Date: 8/18/23 Time: 11:13 ID: IR#12 IR#11 From: Temp Blank Sample Bottle

Observed Temp (°C)	<u>16.3</u>						
Within 0-6°C?	Y <u>N</u>	Y N	Y N	Y N	Y N	Y N	Y N
If <0°C, were samples frozen?	Y N	Y N	Y N	Y N	Y N	Y N	Y N

If out of Temperature, note packing/ice condition: _____ Ice melted Poorly Packed (described below)

& Client Approval to Run Samples: _____ Standing Approval Client aware at drop-off Client notified by: _____

Same Day Rule

All samples held in storage location: R1002 by MM on 8/18/23 at 11:20

5035 samples placed in storage location: _____ by _____ on _____ at _____ within 48 hours of sampling? Y N

Cooler Breakdown/Preservation Check**: Date: 8-22-23 Time: 15:30 by: RDA

- Were all bottle labels complete (i.e. analysis, preservation, etc.)? YES NO
- Did all bottle labels and tags agree with custody papers? YES NO
- Were correct containers used for the tests indicated? YES NO
- Were 5035 vials acceptable (no extra labels, not leaking)? YES NO N/A
- Were dissolved metals filtered in the field? YES NO N/A

14. Air Samples: Cassettes / Tubes Intact Y / N with MS Y / N Canisters Pressurized Tedlar® Bags Inflated N/A

pH	Lot of test paper	Reagent	Preserved?		Lot Received	Exp	Sample ID Adjusted	Vol. Added	Lot Added	Final pH
≥12		NaOH	Yes	No						
≤2	<u>266722</u>	HNO ₃	<u>✓</u>		<u>21396141</u>	<u>11/25</u>				
≤2		H ₂ SO ₄								
<4		NaHSO ₄								
5-9		For 608pest			No=Notify for 3day					
Residual Chlorine (-)		For CN, Phenol, 625, 608pest, 522			If +, contact PM to add Na ₂ S ₂ O ₃ (625, 608, CN), ascorbic (phenol).					
		Na ₂ S ₂ O ₃								
		ZnAcetate	-	-						
		HCl	**	**						

**VOAs and 1664 Not to be tested before analysis. Otherwise, all bottles of all samples with chemical preservatives are checked (not just representatives).

Bottle lot numbers: 061923-16J, 052923-2AEJ

Explain all Discrepancies/ Other Comments: _____

Labels secondary reviewed by: RDA

PC Secondary Review: _____

*significant air bubbles: VOA > 5-6 mm : WC > 1 in. diameter

HPROD	BULK
HTR	FLDT
SUB	HGFB
ALS	LL3541

ALS Group USA, Corp.
dba ALS Environmental
Internal Chain of Custody Report

Client: Neu-Velle LLC
Project: Saginaw-Buffalo

Service Request: R2307578

Bottle ID	Methods	Date	Time	Sample Location / User	Disposed On
R2307578-001.01	6010C				
		8/22/2023	1526	SMO / GESMERIAN	
		8/22/2023	1528	R-A01 / GESMERIAN	
		8/23/2023	1519	In Lab / CDISTEFANO	
		8/23/2023	1533	R-A01 / CDISTEFANO	
R2307578-001.02	8082A				
		8/22/2023	1526	SMO / GESMERIAN	
		8/22/2023	1529	R-002 / GESMERIAN	
		8/24/2023	0957	In Lab / EDEGRAY	
R2307578-001.03					
		8/22/2023	1528	SMO / GESMERIAN	
		8/22/2023	1529	R-002 / GESMERIAN	



Miscellaneous Forms

ALS Environmental—Rochester Laboratory
1565 Jefferson Road, Building 300, Suite 360, Rochester, NY 14623
Phone (585) 288-5380 Fax (585) 288-8475
www.alsglobal.com

REPORT QUALIFIERS AND DEFINITIONS

U	Analyte was analyzed for but not detected. The sample quantitation limit has been corrected for dilution and for percent moisture, unless otherwise noted in the case narrative.	+	Correlation coefficient for MSA is <0.995.
J	Estimated value due to either being a Tentatively Identified Compound (TIC) or that the concentration is between the MRL and the MDL. Concentrations are not verified within the linear range of the calibration. For DoD: concentration >40% difference between two GC columns (pesticides/Aroclors).	N	Inorganics- Matrix spike recovery was outside laboratory limits.
B	Analyte was also detected in the associated method blank at a concentration that may have contributed to the sample result.	N	Organics- Presumptive evidence of a compound (reported as a TIC) based on the MS library search.
E	Inorganics- Concentration is estimated due to the serial dilution was outside control limits.	S	Concentration has been determined using Method of Standard Additions (MSA).
E	Organics- Concentration has exceeded the calibration range for that specific analysis.	W	Post-Digestion Spike recovery is outside control limits and the sample absorbance is <50% of the spike absorbance.
D	Concentration is a result of a dilution, typically a secondary analysis of the sample due to exceeding the calibration range or that a surrogate has been diluted out of the sample and cannot be assessed.	P	Concentration >40% difference between the two GC columns.
*	Indicates that a quality control parameter has exceeded laboratory limits. Under the "Notes" column of the Form I, this qualifier denotes analysis was performed out of Holding Time.	C	Confirmed by GC/MS
H	Analysis was performed out of hold time for tests that have an "immediate" hold time criteria.	Q	DoD reports: indicates a pesticide/Aroclor is not confirmed ($\geq 100\%$ Difference between two GC columns).
#	Spike was diluted out.	X	See Case Narrative for discussion.
		MRL	Method Reporting Limit. Also known as:
		LOQ	Limit of Quantitation (LOQ) The lowest concentration at which the method analyte may be reliably quantified under the method conditions.
		MDL	Method Detection Limit. A statistical value derived from a study designed to provide the lowest concentration that will be detected 99% of the time. Values between the MDL and MRL are estimated (see J qualifier).
		LOD	Limit of Detection. A value at or above the MDL which has been verified to be detectable.
		ND	Non-Detect. Analyte was not detected at the concentration listed. Same as U qualifier.

Rochester Lab ID # for State Accreditations¹



NELAP States
Florida ID # E87674
New Hampshire ID # 2941
New York ID # 10145
Pennsylvania ID# 68-786
Virginia #460167

Non-NELAP States
Connecticut ID #PH0556
Delaware Approved
Maine ID #NY01587
North Carolina #36701
North Carolina #676
Rhode Island LAO00333

¹ Analyses were performed according to our laboratory's NELAP-approved quality assurance program and any applicable state or agency requirements. The test results meet requirements of the current NELAP/TNI standards or state or agency requirements, where applicable, except as noted in the case narrative. Since not all analyte/method/matrix combinations are offered for state/NELAC accreditation, this report may contain results which are not accredited. For a specific list of accredited analytes, contact the laboratory or go to <https://www.alsglobal.com/locations/americas/north-america/usa/new-york/rochester-environmental>

ALS Laboratory Group

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

ALS Group USA, Corp.
dba ALS Environmental

Analyst Summary report

Client: Neu-Velle LLC
Project: Saginaw-Buffalo/

Service Request: R2307578

Sample Name: MH-2-081823
Lab Code: R2307578-001
Sample Matrix: Water

Date Collected: 08/18/23
Date Received: 08/18/23

Analysis Method
6010C
8082A

Extracted/Digested By
CDISTEFANO
JVANHEYNINGEN

Analyzed By
NMANSEN
AFELSER



INORGANIC PREPARATION METHODS

The preparation methods associated with this report are found in these tables unless discussed in the case narrative.

Water/Liquid Matrix

Analytical Method	Preparation Method
200.7	200.2
200.8	200.2
6010C	3005A/3010A
6020A	ILM05.3
9034 Sulfide Acid Soluble	9030B
SM 4500-CN-E Residual Cyanide	SM 4500-CN-G
SM 4500-CN-E WAD Cyanide	SM 4500-CN-I

Solid/Soil/Non-Aqueous Matrix

Analytical Method	Preparation Method
6010C	3050B
6020A	3050B
6010C TCLP (1311) extract	3005A/3010A
6010 SPLP (1312) extract	3005A/3010A
7199	3060A
300.0 Anions/ 350.1/ 353.2/ SM 2320B/ SM 5210B/ 9056A Anions	DI extraction
For analytical methods not listed, the preparation method is the same as the analytical method reference.	



Sample Results

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Semivolatile Organic Compounds by GC

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ALS Group USA, Corp.
dba ALS Environmental

Analytical Report

Client: Neu-Velle LLC
Project: Saginaw-Buffalo
Sample Matrix: Water

Service Request: R2307578
Date Collected: 08/18/23 09:15
Date Received: 08/18/23 10:45

Sample Name: MH-2-081823
Lab Code: R2307578-001

Units: ug/L
Basis: NA

Polychlorinated Biphenyls (PCBs) by GC

Analysis Method: 8082A
Prep Method: EPA 3510C

Analyte Name	Result	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
Aroclor 1016	0.50 U	0.93	0.50	1	08/28/23 18:01	8/24/23	
Aroclor 1221	1.0 U	1.9	1.0	1	08/28/23 18:01	8/24/23	
Aroclor 1232	0.50 U	0.93	0.50	1	08/28/23 18:01	8/24/23	
Aroclor 1242	0.50 U	0.93	0.50	1	08/28/23 18:01	8/24/23	
Aroclor 1248	0.50 U	0.93	0.50	1	08/28/23 18:01	8/24/23	
Aroclor 1254	0.50 U	0.93	0.50	1	08/28/23 18:01	8/24/23	
Aroclor 1260	0.50 U	0.93	0.50	1	08/28/23 18:01	8/24/23	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
Decachlorobiphenyl	138 *	10 - 118	08/28/23 18:01	*
Tetrachloro-m-xylene	52	10 - 103	08/28/23 18:01	



Metals

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Form 1

Inorganic Analysis Data Sheet

Metals by ICP

Workorder
R2307578

Client
Neu-Velle LLC

Project
Saginaw-Buffalo

08/30/2023

ALS Environmental—Rochester Laboratory

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Form 1 - Inorganic Analysis Data Sheet

Client Neu-Velle LLC
Project Saginaw-Buffalo

Workorder
R2307578

Metals by ICP

R2307578-001	Collected	Received	Matrix
MH-2-081823	08/18/23 0915	08/18/23 1045	Water

Analyte	Units	MC	Result	Q	DL	LOQ	DF	Analysis Date	Run ID	PrepBatch
Lead, Total	ug/L	P	39	J	3	50	1	08/29/23 02:40	RPAES06_815477	425309

MC - Method Class CV - Cold Vapor/AA P - ICP/AES MS - ICP/MS



Form 1 - Inorganic Analysis Data Sheet

Client Neu-Velle LLC
Project Saginaw-Buffalo

Workorder
R2307578

Metals by ICP

R2307578-MB								Matrix		
Method Blank								Water		
Analyte	Units	MC	Result	Q	DL	LOQ	DF	Analysis Date	Run ID	PrepBatch
Lead, Total	ug/L	P	3	U	3	50	1	08/29/23 01:21	RPAES06_815477	425309

MC - Method Class CV - Cold Vapor/AA P - ICP/AES MS - ICP/MS



QC Summary Forms

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Semivolatile Organic Compounds by GC

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ALS Group USA, Corp.
dba ALS Environmental

QA/QC Report

Client: Neu-Velle LLC
Project: Saginaw-Buffalo
Sample Matrix: Water

Service Request: R2307578

SURROGATE RECOVERY SUMMARY
Polychlorinated Biphenyls (PCBs) by GC

Analysis Method: 8082A
Extraction Method: EPA 3510C

Sample Name	Lab Code	Decachlorobiphenyl	Tetrachloro-m-xylene
		10 - 118	10 - 103
MH-2-081823	R2307578-001	138 *	52
Method Blank	RQ2310819-01	43	60
Lab Control Sample	RQ2310819-04	34	59
Duplicate Lab Control Sample	RQ2310819-05	33	53

ALS Group USA, Corp.
dba ALS Environmental

Analytical Report

Client: Neu-Velle LLC
Project: Saginaw-Buffalo
Sample Matrix: Water

Service Request: R2307578
Date Collected: NA
Date Received: NA

Sample Name: Method Blank
Lab Code: RQ2310819-01

Units: ug/L
Basis: NA

Polychlorinated Biphenyls (PCBs) by GC

Analysis Method: 8082A
Prep Method: EPA 3510C

Analyte Name	Result	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
Aroclor 1016	0.50 U	1.0	0.50	1	08/28/23 16:22	8/24/23	
Aroclor 1221	1.0 U	2.0	1.0	1	08/28/23 16:22	8/24/23	
Aroclor 1232	0.50 U	1.0	0.50	1	08/28/23 16:22	8/24/23	
Aroclor 1242	0.50 U	1.0	0.50	1	08/28/23 16:22	8/24/23	
Aroclor 1248	0.50 U	1.0	0.50	1	08/28/23 16:22	8/24/23	
Aroclor 1254	0.50 U	1.0	0.50	1	08/28/23 16:22	8/24/23	
Aroclor 1260	0.50 U	1.0	0.50	1	08/28/23 16:22	8/24/23	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
Decachlorobiphenyl	43	10 - 118	08/28/23 16:22	
Tetrachloro-m-xylene	60	10 - 103	08/28/23 16:22	

ALS Group USA, Corp.
dba ALS Environmental

QA/QC Report

Client: Neu-Velle LLC
Project: Saginaw-Buffalo
Sample Matrix: Water

Service Request: R2307578

Date Analyzed: 08/28/23

Duplicate Lab Control Sample Summary
Polychlorinated Biphenyls (PCBs) by GC

Units:ug/L

Basis:NA

Lab Control Sample
RQ2310819-04

Duplicate Lab Control Sample
RQ2310819-05

Analyte Name	Analytical Method	Result	Spike Amount	% Rec	Result	Spike Amount	% Rec	% Rec Limits	RPD	RPD Limit
Aroclor 1016	8082A	2.84	4.00	71	2.60	4.00	65	35-131	9	30
Aroclor 1260	8082A	2.70	4.00	68	2.47	4.00	62	37-141	9	30



Metals

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Form 3

Blanks

Workorder
R2307578

Client
Neu-Velle LLC

Project
Saginaw-Buffalo

08/30/2023

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Form 3 - Blanks

Client Neu-Velle LLC
Project Saginaw-Buffalo

Workorder
R2307578

RPAES06_815477			ICB		CCB		CCB		MB-815477		CCB		CCB	
Units		Run Date	08/28/23		08/29/23		08/29/23		08/29/23		08/29/23		08/29/23	
ug/L		Run Time	18:58		01:02		01:18		01:21		01:54		02:31	
Analyte	DL	LOQ	Result	Q	Result	Q	Result	Q	Result	Q	Result	Q	Result	Q
Lead	3	50	3	U	3	U	3	U	3	U	3	U	3	U

RPAES06_815477			CCB		CCB									
Units		Run Date	08/29/23		08/29/23									
ug/L		Run Time	02:49		03:05									
Analyte	DL	LOQ	Result	Q	Result	Q								
Lead	3	50	3	U	3	U								

Form 7

Laboratory Control Sample

Metals by ICP

Workorder
R2307578

Client
Neu-Velle LLC

Project
Saginaw-Buffalo

08/30/2023

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Form 7 - Laboratory Control Sample

Client Neu-Velle LLC
Project Saginaw-Buffalo

Workorder
R2307578

RunID
RPAES06-815477

Metals by ICP

RPAES06_815477				R2307578-LCS			R2307578-DLCS																
Spike Matrix		Water		Run Date		08/29/23			08/29/23														
Result Units		ug/L		Run Time		01:24			01:27														
Prep Method		Prep Batch		Prep Date		NA			NA														
EPA 3005A/3010A		08/23/23		425309		50 mL			50 mL														
Prep Amt																							
Analyte		%Recovery Limits		Spike Added		LCS Result		%R		Q		LCSD Result		%R		Q		RPD Limit		RPD		Q	
Lead, Total		80-120		500		502		100				502		100				20		0			

Q - %Recovery / RPD Flag * - %Recovery / RPD Outside Limits %R - %Recovery DF - Dilution Factor Amt - Amount (weight or volume)

Appendix D

NEU-VELLE LLC

Institutional Control/ Engineering Control (IC/EC) Certification



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.	915152		
Site Name Saginaw - Buffalo			
Site Address: 320 Scajaquada St.		Zip Code: 14215	
City/Town: Buffalo			
County: Erie			
Site Acreage: 7.248			
Reporting Period: May 04, 2022 to August 31, 2023			
		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? Industrial		☒	☐
7. Are all ICs 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		_____ Date	

SITE NO. 915152

Box 3

Description of Institutional Controls

Parcel

Owner

Institutional Control

101.24-1-3.1

East Delavan Property, LLC

Monitoring Plan
O&M Plan

i) Inspection and Maintenance of Parking Lot #4.

ii) Groundwater and Sewer Monitoring according to the Operation and Maintenance Manual, dated April 2, 2001.

iii) Modification to O&M Frequency Dated January 4, 2004.

iv) Modification to O&M Frequency Dated September 22, 2008.

Box 4

Description of Engineering Controls

Parcel

Engineering Control

101.24-1-3.1

Cover System

Asphalt Parking Lot Cover.

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

YES NO

☒ ☐

2. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

- (a) The 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

Date

IC CERTIFICATIONS
SITE NO. 915152

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 Albert G. Lyons, Jr at Neuville LLC
10 Jones Ave
Rochester, NY 14608
print name print business address

am certifying as Owner Representative (Owner or Remedial Party)

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

Albert G. Lyons, Jr
Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

9/25/23
Date

EC CERTIFICATIONS

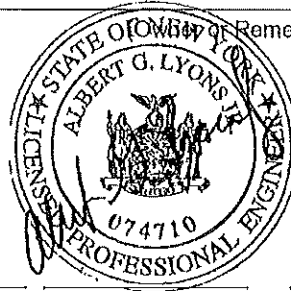
Box 7

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 Albert G. Lyons, Jr at Neo-Velle LLC
print name 10 Jones Ave
Rochester, NY 14608
print business address

am certifying as a Professional Engineer for the _____
(Remedial Party)



Albert G. Lyons, Jr

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

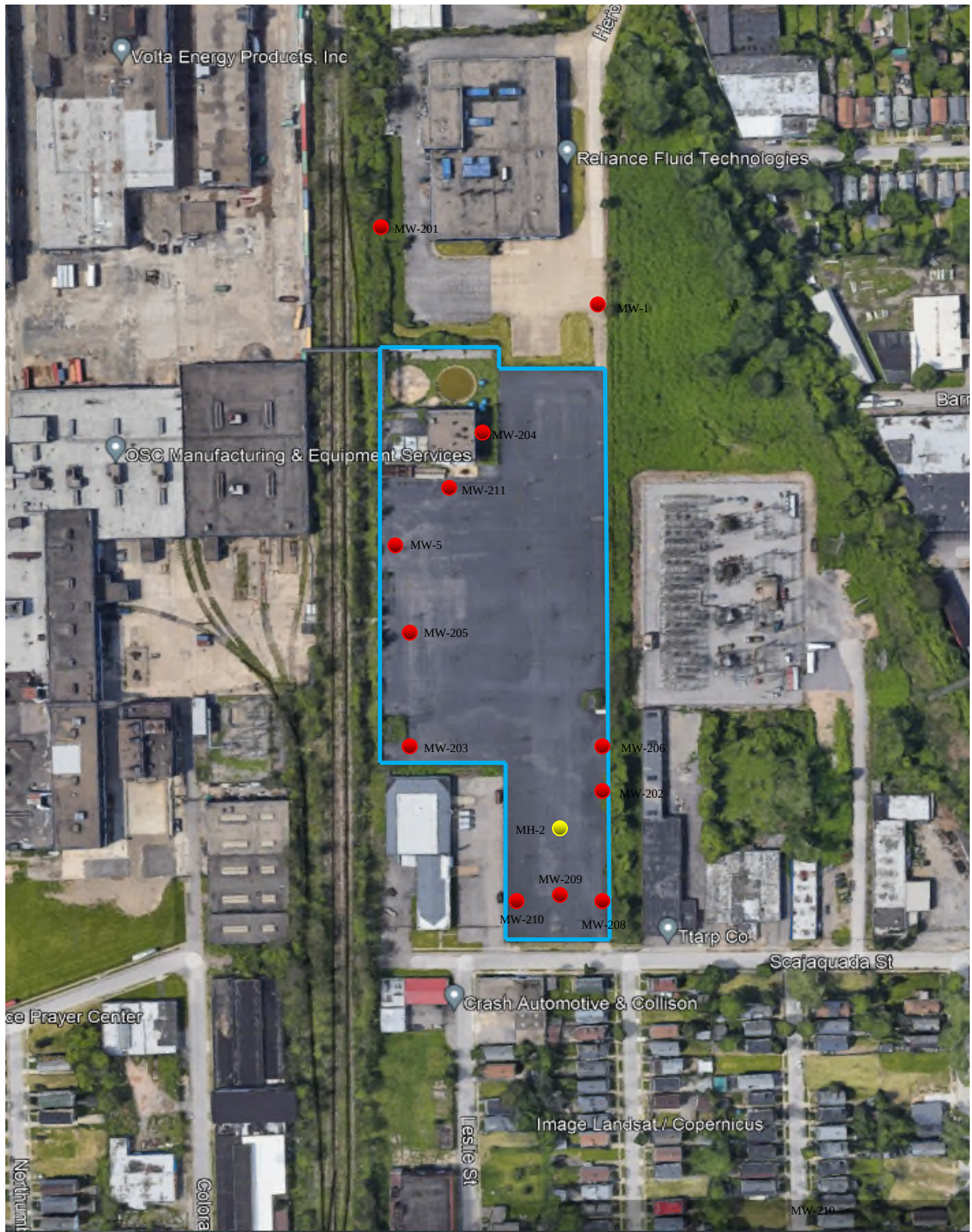
Stamp
(Required for PE)

9/25/23
Date

Appendix E

NEU-VELLE LLC

Site Map



Property Boundary —

Monitoring Well ●

Manhole ●

Appendix F

NEU-VELLE LLC

Survey Map

