



August 29, 2013

Mr. Gregory P. Sutton, P.E.
Regional Hazardous Waste Remediation Engineer
Division of Environmental Remediation, Region 9
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203-2999

**Re: Site Management Plan
Former "Our Cleaners" Site
3163 Eggert Road
Tonawanda, Erie County, New York 14150
Order on Consent Index #B9-0740-07-03**

Dear Mr. Sutton:

Environmental Products & Services of Vermont, Inc. (EPSVT) hereby submits the enclosed Site Management Plan (SMP) for the former "Our Cleaners" site in Tonawanda, NY on behalf of SRK Colvin-Eggert Plaza Associates, LP (SRK).

The SMP:

- Defines the purpose of the Management Plan;
- Establishes a schedule for site monitoring;
- Describes the affected media at the site and the procedures and protocols that will be utilized to monitor the site; and,
- Identifies the institutional and engineering controls and deed restriction placed on the property.

The SMP was reviewed by Mr. Joseph A. Juskiewicz, P.E., New York State Engineer License # 059887.

Please feel free to contact our office with any questions or comments.

Sincerely,

Environmental Products & Services of Vermont, Inc.

Mark D. Wilder
Geoscience Manager

Enc.

Cc: Mr. Fred Back – Benchmark Management Corp.

Mr. David Nossavage – Benchmark Management Corp.
Mr. Kevin J. Cross, Esq. – Lippes Mathias Wexler Friedman LLP
Mr. James D. Charles, Esq. – NYSDEC
Mr. Gary Litwin – NYSDOH
Mr. Randy Klosko – EPSVT
Mr. Mike Hinton – NYSDEC
Mr. Matt Forcucci – NYSDOH

**Former “Our Cleaners” Site
Erie County, New York
Site Management Plan**

**NYSDEC Order on Consent # B9-0740-07-03
Site #915212**

Prepared For:

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Revision #	Submitted Date	Summary of Revision	DEC Approval Date

August 29, 2013

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Site Management Plan (August 2013)

Former “Our Cleaners” Site
Index #B9-0740-07-03
Site #915212

1.0 Introduction and Description of Remedial Program

1.1 Introduction

This Site Management Plan (SMP) is required as an element of the remedial program at “Our Cleaners” (hereinafter referred to as the “Site”) under New York State Department of Environmental Conservation (NYSDEC) Order on Consent #B9-0740-07-03. Remedial activities were performed at the site in accordance with the Order, which was executed on February 5, 2009.

1.1.1 General

SRK Colvin-Eggert Plaza Associates, LP (SRK) entered into an Order On Consent with NYSDEC to remediate a site located at 3161 - 3185 Eggert Road in the Town of Tonawanda, County of Erie, State of New York. The site is part of two parcels (tax ID numbers 53.11-2-31.1 [southern parcel] and 53.11-2-31.2 [northern parcel]). The southern parcel is approximately six-acres improved with two slab-on-grade buildings. The northern parcel is approximately three acres improved with one slab-on-grade building. SRK Colvin-Eggert Plaza Associates LP (SRK) purchased both parcels in 1998 and sold the northern parcel to Buffalo Athletic Club for Women (BACW) in 2004.

The Order On Consent required the Remedial Party (SRK), to investigate and remediate contaminated media at the Site. A Site Location Map is attached as **Figure 1**. A Site Map showing the site boundaries is provided in **Figure 2**. The area of the Site subjected to the provisions of the SMP is included in an Institutional Control (IC) established for the site. A deed restriction for the site is located in **Appendix A**. The boundaries of the deed restricted area of the site are fully described in the deed restriction. It is understood that the Engineering Controls and Institutional Controls (section 2 below) and the Operation and Maintenance Plan (section 4 below) apply only the deed restricted area set forth in Appendix A.

After completion of the remedial work described in the Interim Remedial Measure (IRM) Work Plan, some contamination was left in the subsurface at the Site, which is hereafter referred to as “remaining contamination.” This SMP was prepared to manage remaining contamination at the site until the deed restriction is extinguished in accordance with ECL Article 71, title 36. All reports associated with the site can be viewed by contacting NYSDEC or its successor agency managing environmental issues in New York State.

This SMP was prepared by Environmental Products & Services of Vermont, Inc. (EPSVT), on behalf of SRK, in accordance with the requirements in NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation, dated March 2010, and the guidelines provided by NYSDEC. This SMP addresses the means for implementing the Institutional Controls (ICs) and Engineering Controls (ECs) that are required by the deed restriction for the Site.

1.1.2 Purpose and Schedule

The site contains contamination left after completion of the remedial action. ECs have been incorporated into the site remedy to control potential exposure to remaining contamination during the use of the site to ensure protection of public health and the environment. A deed restriction granted to SRK, and recorded with the Erie County Clerk, will require compliance with this SMP and all ECs and ICs placed on the Site. The ICs place restrictions on site use, and mandate operation, maintenance, monitoring, and reporting measures for all ECs and ICs. This SMP specifies the methods necessary to ensure compliance with all ECs and ICs required by the deed restriction for contamination that remains at the site. This plan has been approved by NYSDEC, and compliance with this plan is required by the grantor of the deed restriction and the grantor's successors and assigns. This SMP may only be revised with approval of NYSDEC.

This SMP provides a detailed description of all procedures required to manage remaining contamination at the site after completion of the Remedial Action, including:

- Implementation and management of all Engineering and Institutional Controls;
- Media Monitoring;
- Operation and Maintenance of all treatment, collection, containment, or recovery systems;
- Performance of periodic inspections, certification of results, and submittal of Periodic Review Reports; and,
- Defining criteria for termination of treatment system operations.

To address these needs, this SMP includes three plans:

- An Engineering and Institutional Control Plan for implementation of EC/ICs
- A Monitoring Plan for implementation of Site Monitoring; and,
- An Operation and Maintenance Plan for implementation of remedial collection, containment, treatment, and recovery systems.

This plan also includes a description of Periodic Review Reports for the periodic submittal of data, information, recommendations, and certifications to NYSDEC.

It is important to note that:

- This SMP details the site-specific implementation procedures that are required by the deed restriction. Failure to properly implement the SMP is a violation of the deed restriction, and thereby subject to applicable penalties;

- Failure to comply with this SMP is also a violation of Environmental Conservation Law, 6NYCRR Part 375 and the Order on Consent for the site, and thereby subject to applicable penalties.

1.1.3 Revisions

Revisions to this plan will be proposed in writing to NYSDEC's project manager. In accordance with the deed restriction for the Site, NYSDEC will provide a notice of any approved changes to the SMP, and append these notices to the SMP that is retained in its files.

1.2 Site Background

1.2.1 Site Location and Description

The Site is located at 3161 - 3185 Eggert Road in the Town of Tonawanda, County of Erie, State of New York. The Site is part of two parcels (tax ID numbers 53.11-2-31.1 [southern parcel] and 53.11-2-31.2 [northern parcel]) and consists of the area immediately around and beneath the former "Our Cleaners" location in the former West Shops Building and the area to the north-northeast extending to the Buffalo Athletic Club for Women (BACW) property. The southern parcel is approximately six-acres improved with two slab-on-grade buildings. The main building (East Shops building) encompasses approximately 38,000 square feet while the smaller outbuilding encompasses approximately 1,600 square feet. Currently, the main site building is an operating strip mall. Tenants of the strip mall include BK Ryan's (bar/restaurant), Carol Ann Hair Fashions (beauty shop), The Goodwill Store, Midnight Wines and Liquors (liquor store), Autumn Tan (tanning salon), Jindo Martial Arts, and US Renal Care. The smaller outbuilding is occupied by Dunkin Donuts. The northern parcel is approximately three acres improved with one slab-on-grade building encompassing approximately 24,000 square feet. This building is currently the BACW. SRK Colvin-Eggert Plaza Associates LP (SRK) purchased both parcels in 1998 and sold the northern parcel to BACW in 2004. The site is located in a commercial/residential area of the Town of Tonawanda. Surrounding land use is as follows:

- Interstate Route 290 is located north of the site.
- The East Shops followed by residential properties are located east of the site.
- Additional portions of tax parcel 53.11-2-31.1 including the vacant outbuilding followed by the Augustana Lutheran Church are located south of the site.
- The intersection of Colvin Boulevard and Eggert Road followed by a Kwik Fill gas station/convenience store are located to the west of the Site.

1.2.2 Site History

In April 1998, Sear-Brown Group completed a Phase I Environmental Site Assessment (ESA) of the property as it was defined at the time. The Phase I ESA identified environmental concerns which showed that a dry cleaning business had been in operation in the West Shops building on site for approximately 10 years. Although there was no physical evidence of any spilling, soil sampling was recommended to determine if there was any impact because of the dry cleaning operations.

In June 1998, Sear-Brown Group completed a Phase II ESA. The Phase II ESA was conducted to investigate the soil and groundwater near the Our Cleaners operations in the West Shops building identified as an environmental concern in the Phase I ESA. The West Shops building, which housed Our Cleaners, was still in existence at this time. During the Phase II ESA, two small diameter soil borings were advanced (i.e., B-1 and B-2) near the dry cleaning facility (see **Figure 3** for a site map with these boring locations). Temporary monitoring wells were then installed in B-1 and B-2 for collection of groundwater samples. The sample from B-2 returned a result with an elevated concentration of tetrachloroethene (PCE), a common dry cleaning solvent, thereby warranting the need for additional subsurface investigation to define the source and the horizontal and vertical extent of the impacts near the dry cleaner operation.

In September 1998, a Limited Subsurface Investigation was completed by Barron & Associates, P.C. to confirm the impacts identified in the Sear-Brown Group Phase II ESA. During the SSI, a 2-inch monitoring well (i.e., B/OW-2) was installed adjacent to B-2. Groundwater samples were collected from B/OW-2 and another previously installed monitoring well (i.e., OW-VAC). PCE was detected in both of these wells, but at levels below the New York State Department of Environmental Conservation (NYSDEC) TOGS 1.1.1 standard. Based on the results, Benchmark proceeded with the purchase of the property.

In June 2004, Stantec Consulting Group completed a Phase II ESA to determine if any groundwater impacts had migrated north from the former dry cleaners onto the area of the property that was being considered for subdivision and sale to BACW. The investigation was performed at the request of BACW. During this Phase II ESA, four soil borings (i.e., B1 through B4) were advanced north of the proposed subdivision line in locations presumed to be downgradient of the former dry cleaner. The locations of B1 through B4 and the proposed property line are shown on **Figure 3**. Groundwater samples only were collected from the four borings. Groundwater collected from boring locations B1 and B2 indicated concentrations of chlorinated solvents above NYSDEC TOGS 1.1.1 groundwater standards, while concentrations of chlorinated solvents were not detected in borings B3 and B4.

In November 2004, Clayton Group Services, Inc. completed a Limited Phase II ESA. The ESA was conducted to further delineate chlorinated solvent impacts to groundwater on-site as well as determine a source of the impacts. Nine soil borings (i.e., SB-1 through SB-9) were advanced, two of which were inside the former dry cleaners storefront in the “West Shops” near the former dry cleaning machine (i.e., SB-3 and SB-4). The locations of SB-1 through SB-9 are shown on **Figure 3**. Soil samples were collected from all nine soil boring locations and the results indicated PCE at levels above NYSDEC TAGM 4046 guidance values in SB-3 and SB-4. PCE

was not detected or was detected at levels below TAGM 4046 guidance values in the remaining soil borings. Seven temporary groundwater monitoring wells (i.e., TW-1 through TW-7) were installed and groundwater analytical results indicated PCE levels above NYSDEC TOGS 1.1.1 standards were present under the former “West Shops” building and migrating onto the northern portion of the property.

In December 2006, Clayton Group Services, Inc. completed an excavation of chlorinated solvent-impacted soil with the approximate dimensions of 80 feet wide (east to west) by 45 feet long (north to south) by 4 to 8 feet deep. Approximately 1,130 tons of soil was excavated and transported offsite to CWM Chemical Services, LLC, Model City, NY for final disposition. Confirmatory endpoint sampling returned PCE analytical results at or below NYSDEC TAGM 4046 guidance values.

On October 28, 2008, EPSVT submitted to NYSDEC a Remedial Investigation/Interim Remedial Measure (RI/IRM) Work Plan to investigate the nature and extent of current vapor phase and groundwater impacts on the site and the BACW property located north of the site. Although there had been an extensive remedial excavation of approximately 1,130 tons of former source area impacted soil completed at the site, the current nature and extent of groundwater and soil vapor contamination at the site needed further investigation. Work plan approval was received from NYSDEC, and the installation of monitoring wells MW-1S&D through MW-8S&D, and soil vapor points SV-1 through SV-8 was completed from November 18 through November 24, 2008. In January 2009, after receiving the Preliminary Data Package from EPSVT discussing the results of the previously mentioned installation event, NYSDEC requested the installation of six additional monitoring wells (i.e., MW-9S&D through MW-14S&D) as well as six corresponding soil vapor sampling points (i.e., SV-9 through SV-14). Installation of monitoring wells MW-9S&D through MW-13S&D and MW-14S as well as installation of soil vapor sampling points SV-9 through SV-14 was completed from January 19 through January 21, 2009. Installation of MW-14D was completed on February 2, 2009. **Figure 4** shows the monitoring well locations. **Figure 5** shows the soil vapor sampling point locations.

In February 2009, EPSVT collected groundwater samples from the new wells and several of the wells installed during the first phase of drilling (MW-1S&D through MW-3S&D and MW-8S&D through MW-14S&D). MW-4S&D through MW-7S&D were not sampled during the second round due to lack of significant contamination in the first round. The samples were sent for analysis of VOCs using USEPA Method 8260. In addition to the groundwater analysis, the six new soil vapor points (SV-9 through SV-14) and the previously installed soil vapor points were also sampled. Results from the soil vapor sampling revealed that data from the first sampling event (in December 2008) remained consistent with this sampling event, therefore eliminating the concern for soil vapor intrusion. However, the results from the groundwater sampling indicated that the size of the contaminated groundwater plume was larger than originally anticipated, and that the potential for shallow dissolved phase groundwater to migrate downward (from the former source area) was a substantial concern for the deeper groundwater to the east. This new information was provided to the NYSDEC in a Supplementary Preliminary Data Package on March 27, 2009, and subsequently warranted a change in the original IRM Work Plan. A Revised IRM Work Plan (incorporating comments from the NYSDEC &

NYSDOH) was submitted to the NYSDEC on May 8, 2009, and was approved through the regulatory agencies.

To facilitate in-situ chemical oxidation and soil vapor extraction (SVE), twelve chemical oxidation remediation well pairs (i.e., RW-1 through RW-12) and five SVE wells (i.e., SVE-1 through SVE-5) were installed April 20, 2009 through April 30, 2009 in the locations shown on **Figure 4**. All work was completed in accordance with the Remedial Investigation (RI) and Revised Interim Remedial Measure (IRM) Work Plan submitted to NYSDEC in May 2009. During drilling of boreholes for the chemical oxidation injection well pairs, soil samples were collected continuously from grade to approximately 27 feet below ground surface (bgs). Soil samples were not collected during drilling for the installation of the SVE wells. Soil from each sample interval was placed in a plastic bag and the headspace was screened for organic vapors using a photoionization detector (PID) meter. Soil descriptions, including soil type, observations regarding the presence of free product, observable odors, staining, etc. and PID readings were detailed on soil boring logs and can be found as **Appendix G** in this report. In accordance with the IRM Work Plan, since no sample returned a PID reading above 50 parts per million (ppm), no soil sample was submitted for laboratory analysis.

Two 2-inch ID remediation injection wells were installed in each injection well pair boring. One well was screened from approximately 25 to 27 feet bgs. The other well was screened from approximately 22 to 24 feet bgs. A sand pack was placed from 27 feet bgs to approximately 20 feet bgs. The remainder of the borehole was sealed using tremie-grout to approximately 2 feet bgs, and then with sand pack to near surface. The remediation wells were finished with a flush-mount protective road box in a concrete well pad. A 4-inch ID SVE well screened from approximately five to ten feet bgs was installed in each SVE boring. A sand pack was placed from ten feet bgs to approximately four feet bgs. A bentonite seal was placed from approximately four to two feet bgs. The remainder of the borehole was filled with sand until the well was completed during the installation of the SVE system from April 27 through May 1, 2009. The locations of the SVE wells, process piping trench and remedial shed are shown on **Figure 4**.

Based on site data and groundwater chemistry obtained during the RI, EPSVT designed an in-situ chemical oxidation application regime. The chemical injection event was conducted from May 11 through May 18, 2009. A 10% solution of hydrogen peroxide (“peroxide”) with no additional modifications was used for chemical oxidation. The peroxide was injected in the shallower screened injection well (i.e., screened from 22 to 24 feet bgs) using a Geoprobe GS2000 injection machine specifically designed for this purpose. During injection of the hydrogen peroxide, a tow-behind air compressor was connected to the deeper screened injection well (i.e., screened from 25 to 27 feet bgs) to facilitate air sparging. A total of 3,300 gallons of peroxide, or approximately 275 gallons of peroxide per well, was injected per event. However, only 165 gallons of peroxide was able to be injected into RW-11 due to a compromised well seal. To ensure the remainder of peroxide planned for RW-11 was injected at the site, the amount of peroxide injected into RW-6 and RW-7 was increased by 55 gallons (i.e., 330 gallons). RW-6 and RW-7 were chosen based on their proximity to the center of the contaminant plume.

The SVE system, which was installed from April 27 to May 1, 2009, was started on May 8, 2009. An effluent air sample was collected on May 14 and June 10, and sent for laboratory analysis of volatile organic compounds (VOCs) using method TO-15 SIM. Discharge loading calculations for May 14th were 2.20E-05 pounds per hour, which converts to 9.63E-05 tons per year. Discharge loading calculations for June 10th were 2.14E-05 pounds per hour and 9.36E-05 tons per year. The average discharge from the SVE system based on these two sampling events is 2.17E-5 lbs/hr. Since this was several orders of magnitude less than the NYSDEC threshold of 0.5 lbs/hr when treatment would be required, EPSVT concluded that future sampling of the SVE system effluent for laboratory analysis would not be required unless a PID reading of 5ppm or greater was obtained during the monthly O&M site check.

A second chemical injection event occurred from November 11 through November 24, 2009. A 10% solution of hydrogen peroxide with no additional modifications was used for chemical oxidation. The peroxide was injected in the shallower screened injection well (i.e., screened from 22 to 24 feet bgs) using a Geoprobe GS2000 injection machine. In cases where the peroxide could not be injected into the shallow well (due to refusal), it was injected into the deeper screened injection well (i.e., screened from 25 to 27 feet bgs) instead. During injection of the hydrogen peroxide, a tow-behind air compressor was connected to the deeper or shallower screened injection well, depending on which interval the peroxide was being injected into, to facilitate air sparging. A total of 3,987.5 gallons of peroxide was injected during this event. This is almost 1,000 more gallons than the anticipated (per event) amount discussed in the April 2009 RI and IRM Work Plan. Two wells (RW-9 and RW-10) were targeted for extra peroxide based on their proximity to the eastern edge of the contaminant plume, and because of the presence of higher permeable material surrounding each well. An average of 618.5 gallons was injected into the two wells. The targeted peroxide amount (275 gallons) was not able to be injected into remediation wells RW-5 and RW-7. This is likely due to the lower permeability of the native material in this area. 192.5 gallons were injected into RW-5, and 247.5 gallons were injected into RW-7. A lower volume of peroxide (less than 50 gallons) was injected into RW-11, due to lower permeability native material in this area. The remaining seven remediation wells (i.e., RW-1, RW-2, RW-3, RW-4, RW-6, RW-8, and RW-12) had an average of 330 gallons of peroxide injected into them.

On December 21, 2009, EPSVT received a comment letter from the NYSDEC in response to the July-September 2009 Quarterly Report. One of the requests from the NYSDEC was to implement EPSVT recommendations in the July-September 2009 Quarterly Report. One of the recommendations pertained to applying extra sparge gas near wells that have shown an increase in chlorinated hydrocarbon concentrations between June and September 2009 (i.e., MW-10S, MW-11S, and MW-12D). This application of extra sparge gas occurred in December 2009. Another recommendation was to more closely monitor MW-12S&D since chlorinated hydrocarbon concentrations increased between June and September 2009, and because of its proximity to the property boundary. Subsequently, MW-12S&D were added to the base list of wells that are sampled quarterly. The second request by the NYSDEC was to install two shallow and deep well pairs east of MW-12S&D and two shallow wells south of MW-10S&D, based on an increase in concentration of cis-1,2 Dichloroethene in those wells during the September 2009 sampling event. EPSVT suggested maintaining close monitoring of those wells, and to re-evaluate the decision after the March 2010 quarterly sampling event.

Correspondence between NYSDEC and EPSVT in January 2010 allowed for the deferment of the installation of wells east of MW-12S&D, but affirmed their request for the installation of two shallow wells to the south of MW-10S&D. The NYSDEC also suggested that the next quarterly sampling event be moved up from March to February 2010, and that MW-4S&D be added to the list of wells sampled during the next quarter. EPSVT response in February 2010 to NYSDEC requested deferring the installation of wells to the south of MW-10S&D, based on groundwater flow and lack of potential receptors to the south. EPSVT also suggested that, rather than move the whole quarterly sampling event up, only MW-3S&D and MW-4S&D would be re-sampled in February 2010, and the sparging schedule would be adjusted accordingly. The NYSDEC responded insisting that new wells south of MW-10S&D were necessary, and accepted the request to sample MW-3S&D and MW-4S&D in February and adjust the sparging schedule accordingly. SRK authorized EPSVT to install two shallow wells south of MW-10S&D.

To increase the potential for remediation efforts to impact site contaminant levels, extra sparging occurred at the site from January 20 through 21, 2010 and from February 10 through 11, 2010. The sparging occurred in the vicinity of monitoring wells that showed relatively higher contaminant concentrations.

On March 3 and 4, 2010, EPSVT mobilized to the site for the installation of two shallow wells (i.e., MW-17S and MW-18S) south of MW-10S&D. During drilling of boreholes for the shallow monitoring wells, soil samples were collected continuously from grade to approximately 26 feet below ground surface (bgs) for MW-17S, and approximately 20 feet bgs for MW-18S. Soil from each sample interval was placed in a plastic bag and the headspace was screened for organic vapors using a photoionization detector (PID) meter. Since no sample returned a PID reading above 50 parts per million (ppm), no soil sample was submitted for laboratory analysis. One 2-inch ID monitoring well was installed in each boring (two borings/wells total). MW-17S was screened from approximately 10 to 26 feet bgs. MW-18S was screened from approximately 10 to 20 feet bgs. A sand pack was placed from the bottom of each well to approximately 8 feet bgs. The remainder of the borehole was sealed using tremie-grout to approximately 2 feet bgs, and then with sand to near surface. The remediation wells were finished with a flush-mount protective road box in a concrete well pad. The locations of MW-17S and MW-18S are shown on **Figure 4**.

A comprehensive sampling event including the new wells was performed in June 2010. Conclusions in the subsequent report included:

- Shallow and deep groundwater flow patterns continued to show a west to east-northeast trend.
- Groundwater contaminant concentrations across the site have decreased since the initiation of chemical oxidation application events and, in particular, since there was a spike in concentrations at several wells in December 2009. This trend is particularly noticeable at deeper wells on site like MW-3D and MW-10D. This is especially relevant since there is an overall downward hydraulic gradient across the site.
- There are two shallow wells, MW-3S and MW-8S, where contaminant concentrations remained somewhat elevated. However, in the case of MW-3S, the bulk of the chlorinated hydrocarbon compounds detected were breakdown products, which is indicative of the

dechlorination of PCE. This fact, in conjunction with the downward hydraulic gradient from shallow wells in the former source area (MW-8S), and the downward trend in deep well concentrations with distance from the source area, leads to the conclusion that the predominant dry cleaning solvent used (PCE) is breaking down as groundwater travels across the site from the former source area, and the contamination is contained in the study area. In addition, the contaminant concentrations have dropped dramatically at MW-3S during the December 2010 sampling event.

- In several wells monitored at the site, the drop in contaminant concentrations has leveled off over time. This trend indicates that the reduction in contaminated mass has become asymptotic and that continued chemical oxidation application events will not be cost effective.
- Chlorinated hydrocarbon contaminant mass calculations indicate this trend by showing a reduction of 4.76% from March to June 2010. From February 2009 to December 2010 there has been an overall reduction of 45.43%.
- Some concerns have surfaced over the possible mounding of groundwater during and after the injection of chemicals and air sparging below the water table at the site and its potential to force contaminated mass outward toward the edges of the plume. Following the last injection event, groundwater elevations were measured and there was a noticeable increase in the water levels.
- For the above reasons, EPSVT recommended discontinuing chemical oxidizer applications at the site. Since the chemical oxidizer applications are recommended to cease, there would be no need for continued operation of the SVE system.

Based upon the conclusions presented above, in a work plan dated December 8, 2010, EPSVT recommended Monitored Natural Attenuation (MNA), through the monitoring of water levels across the site and the collection of groundwater samples. In correspondence dated December 17, 2010, NYSDEC approved the MNA work plan.

Operation of the former SVE system was discontinued in November 2010 with NYSDEC permission. The former SVE system was dismantled during February 2011. In lieu of continued operation of the SVE System through the winter season (per NYSDEC request in August 24, 2010 letter), a sub-slab depressurization system was installed below the northern portion of the “East Shops” structure. A portion of the deep zone dissolved groundwater plume was implied by existing water quality data to be located beneath the northern portion of the East Shops. A build-out of the northern East Shops space was underway for a new tenant (US Renal Care) and the sub-slab depressurization system was installed as a preventative measure to guard against possible future vapor issues in the northern portion of the East Shops building. The exhaust of the sub-slab depressurization system was sampled in December 2011 and analyzed for the presence of VOCs in accordance with USEPA Method TO-15. The exhaust was also sampled in January and February 2012. Sampling was conducted to evaluate the potential VOC concentrations in soil vapor extracted from beneath the northern portion of the “East Shops” structure. The initial SSDS exhaust sampling (December 22, 2011) yielded low VOC detections. Tetrachloroethylene was detected at a concentration of 4.7 micrograms per cubic meter, below the NYSDOH guideline value of 100 micrograms per cubic meter. Analytical results from the subsequent sampling events indicated a stable trend in Tetrachloroethylene (7.5 micrograms per cubic meter – January 12, 2012, and 8.8 micrograms per cubic meter – February 2012). Several compounds including Acetone,

Dichlorodifluoromethane, Ethanol, Ethyl Acetate, and Methylene Chloride were detected in the SSDS exhaust samples and background samples indicating these detections were laboratory contaminants.

The low level contaminant concentrations found in soil vapor samples collected for TO-15 analysis from the sub-slab depressurization system exhaust are below the NYSDOH Soil Vapor Intrusion Guidance value of 100 micrograms per cubic meter. The documented soil vapor contaminant concentrations are in the range where a significant effect on indoor air quality is not anticipated. Furthermore, the collected soil vapor data are conservative based upon sample collection during an operational HVAC timeframe. Stack effect typically contributes to increased contaminant concentrations.

1.2.3 Geologic Conditions

The site is generally covered by asphalt except for some small landscaped areas. The surface improvements are underlain by fill material (gray, moist, fine to coarse sand with some gravel) to approximately one foot below ground surface (bgs), then by red-brown, dry to moist, fine sand with trace to some silt to approximately 10 feet bgs followed by brown, wet, silty medium sand to approximately 20 feet bgs. This is followed by brown, wet, fine sand with increasing silt content to approximately 27 feet bgs where dense, brown, moist, silt with trace fine gravel glacial till material is encountered to at least 33 feet below grade where the deepest boring encountered refusal. Bedrock was not encountered in any of the borings completed in the vicinity of the site.

The water table was encountered at approximately 10 feet bgs in August 1998 and September 2004. During the performance of the RI work scope in 2009, groundwater was encountered from 6.96 feet bgs in MW- 14S to 10.50 feet in MW-1S. A Historical Summary of Groundwater Elevations is presented in **Table 1**. Water levels were surveyed to a common site datum and groundwater flow had been determined to flow to the east-northeast from the area of the former “Our Cleaners” operation. This direction of groundwater flow is different from the direction of groundwater flow assumed for the site by earlier consultants. During previous site work, the groundwater flow direction was believed to be generally to the north-northeast. Nested well clusters were installed at the site to monitor shallow groundwater conditions and deeper groundwater conditions. **Figure 6** presents the Shallow Groundwater Elevation Map for the most recent groundwater sampling event which occurred in December 2011. **Figure 7** presents the Deep Groundwater Elevation Map.

1.3 Summary of Remedial Investigation Findings

In accordance with the RI/IRM (Remedial Investigation/Interim Remedial Measure) Work Plan, submitted on October 28, 2008, a RI Report was prepared. Based on the data collected during the RI, EPSVT determined that the extent of the dissolved groundwater contaminant plume was more extensive than anticipated when the work plan was submitted. Therefore, in accordance with the work plan, the IRM was modified to encompass the plume area. Comments from NYSDEC in a letter dated April 9, 2009, were incorporated into the RI Report dated May 8, 2009.

Based on soil laboratory analytical results, the on-site soil did not exceed 6 NYCRR Part 375 Unrestricted Use SCOs. Therefore, any further remedial investigation activities did not need to include soil sampling and analysis.

Based on the results of the soil vapor laboratory analytical results, elevated concentrations of PCE and TCE existed in the soil vapor near the location of the former dry cleaning machine. There are no buildings in this area so these elevated PCE and TCE concentrations in the soil vapor have not been a concern. This area is also located within the deed restricted area of the Site (see **Appendix A**). Soil vapor sampling results from samples taken near the BACW and East Shops Building returned very low-level concentrations of PCE and TCE. Therefore, potential soil vapor intrusion in the BACW and East Shops Building was not an issue.

Based on the results of the groundwater monitoring and laboratory analytical results, there were dissolved phase groundwater impacts in the shallow groundwater near the former source area that have a downward migration component affecting the deeper groundwater to the east. Although the dissolved phase groundwater contaminant plume was larger than anticipated, impacted groundwater had not migrated off the property to the east and did not appear to be significant in any area below any structure in the study area including the BACW and the East Shops. In these areas, the groundwater contamination was present predominantly in the deeper groundwater zone and off-gassing into the vadose zone was not an issue as shown by the lack of significant soil gas impacts near the buildings down gradient of the source area.

1.4 Summary of Remedial Actions

The site was remediated in accordance with the NYSDEC approved IRM dated October 28, 2008 and revised May 8, 2009. The following is a summary of the remedial actions completed at the site.

- Excavation of contaminated soil in the footprint of the former Our Cleaners structure (Note: This work was performed in December 2006 by Clayton Services Group, Inc. and it pre-dated the IRM Work Plan);
- Injection of Hydrogen Peroxide into nested wells with air sparging for enhanced Peroxide distribution in the sub-surface;
- Installation and operation of a soil vapor extraction (SVE) system;
- Installation and operation of a sub-slab vapor mitigation system beneath the north end of the “East Shops” building;
- Execution and recording of a deed restriction to restrict land use and prevent any future exposure to contamination at the site; and,
- Development and implementation of a Site Management Plan for long term management of remaining contamination as required by the deed restriction, which includes plans for Institutional and Engineering Controls, monitoring, operation and maintenance, and reporting.

Remedial activities were completed at the site in May 2010 with the third and final Hydrogen Peroxide injection event. Operation of the SVE system was discontinued in November 2010 with NYSDEC permission. The former SVE system was dismantled during February 2011. In lieu of continued operation of the SVE System, a Sub-Slab Depressurization System (SSDS) was installed below the northern portion of the “East Shops” structure. The SSDS is currently operational.

1.4.1 Removal of Contaminated Materials from the Site

In December 2006, Clayton Group Services, Inc. completed an excavation of chlorinated solvent-impacted soil with the approximate dimensions of 80 feet wide (east to west) by 45 feet long (north to south) by 4 to 8 feet deep (refer to **Figure 8**). Approximately 1,130 tons of soil was excavated and disposed of off-site. Confirmatory endpoint sampling returned PCE analytical results at or below NYSDEC TAGM 4046 guidance values.

Investigation derived waste (two 30 cubic yard roll off boxes) of drill rig soil cuttings were generated and transported for disposal at Allied Waste Niagara Falls Landfill Facility, Niagara Falls, NY in March 2009. A total of 12.8 tons of non-hazardous soil was generated during the IRM installation of monitoring wells and injection wells.

All development water and groundwater sampling purge water was containerized in 55-gallon drums and staged onsite until drums were full, then transported offsite for disposal to EPSVT Syracuse, NY facility. A total of one drum of contaminated well purge water was generated and transported for offsite disposal.

1.4.2 Site Related Treatment Systems

A Sub-Slab Depressurization System is currently active in the northern portion of the East Shops building as requested by NYSDEC. This system is currently operating as a preventive measure to help prevent any possible migration of sub-surface vapors into the east shops structure (currently leased by US Renal Care). Soil gas vapor monitoring of this area during the RI indicated soil gas vapor concentrations were below NYSDOH action levels in this area and not of concern. No other long term remediation systems were installed as a part of the site remedy. An SVE system was operational at the Site during the chemical injection activities performed at the site. The SVE system was shut down in November 2010 and dismantled in February 2011.

1.4.3 Remaining Contamination

Based upon the soil analytical data collected during the IRM investigation, and earlier data collected by Clayton Group Services, Inc., no significant area of near surface soil contamination related to the former Our Cleaners structure remains on-site. The Clayton Group Services, Inc. excavation of approximately 1,130 tons of PCE impacted soil removed the near surface impacted soils. Soil analytical results indicated the concentrations Tetrachloroethene and Trichloroethene are below the 6 NYCRR Part 375 Unrestricted Use Soil Cleanup Objectives (SCOs).

The results of the Remedial Investigation/Interim Remedial Measure (RI/IRM) to investigate the nature and extent of vapor phase and groundwater impacts on the site, the BACW property, and the northern portion of the East Shops indicated there were no significant vapor phase soil gas issues at the site. A review of the data reveals there are elevated levels of PCE and TCE near the location of the former dry cleaning machine (i.e., SV-1 and SV-2) but there is no concern for soil vapor intrusion near the BACW and East Shops Building (i.e., SV-8, SV-11, SV-12, SV-13 and SV-14).

Chlorinated hydrocarbon contaminant mass calculations indicate there was an overall reduction of 93.64% in chlorinated hydrocarbon concentrations in groundwater from February 2009 to December 2011. **Table 2** presents the Historical Summary of Groundwater Analytical Results. **Figure 6** and **Figure 7** depict the Shallow and Deep Groundwater Elevation Maps, respectively, for the December 2011 Monitored Natural Attenuation (MNA) sampling event. The remaining dissolved phase contamination at the site appears to have stabilized and is confined to the site. Shallow groundwater chlorinated solvent concentrations from the December 2011 groundwater sampling event are depicted on **Figure 9**. Deeper groundwater chlorinated solvent concentrations from the December 2011 groundwater sampling event are depicted on **Figure 10**. Contaminant mass calculations indicate a significant decrease in the shallow and deep well chlorinated solvent mass. **Table 3** presents a summary of the mass calculations for the site.

2.0 Engineering and Institutional Control Plan

2.1 Introduction

2.1.1 General

Since remaining groundwater contamination exists beneath the site, Engineering Controls and Institutional Controls (EC/ICs) are required to protect human health and the environment. This Engineering and Institutional Control Plan describes the procedures for the implementation and management of all EC/ICs at the site. The EC/IC plan is one component of the SMP and is subject to revision by NYSDEC.

2.1.2 Purpose

This plan provides:

- A description of all EC/ICs on the Site;
- The basic implementation and intended role of each EC/IC;
- A description of the key components of the ICs set forth in the deed restriction;
- A description of the features to be evaluated during each required inspection and periodic review;
- A description of plans and procedures to be followed for implementation of EC/ICs, such as the implementation of the Excavation Work Plan for proper handling of remaining contamination that may be disturbed during maintenance or redevelopment work on the site. Even though the near surface contaminated soils have been removed at the Site, it is prudent to follow certain precautions if and when any future excavation activities are undertaken in the restricted area of the Site; and,
- Any other provisions necessary to identify or establish methods for implementing the EC/ICs required by the site remedy, as determined by the NYSDEC

2.2 Engineering Controls

2.2.1 Engineering Control Systems

2.2.1.1 Soil Cover or Cap

The site is covered with an asphalt paved surface parking lot with a storm water collection system. The storm water collection system acts to intercept and redirect surface water away from the area of concern. The asphalt paved surface essentially acts as a cap; however, impacted soils below the former Our Cleaners structure were removed in December 2006 during the Clayton Group Services, Inc. excavation work.

2.2.1.2 Sub-Slab Depressurization System

Based on NYSDEC request, a sub-slab depressurization system (SSDS) was installed to prevent potential migration of contaminated soil vapor to the interior of the northern portion of the “East Shops” structure. A pre-installation pilot test was performed to assist with the system design and post-installation testing was completed to verify system effectiveness.

The pilot test was performed on November 10, 2010 within the subject structure prior to remodeling. The data collected during pilot test activities outlines relative vacuum influence beneath the structural slab in the approximate 98-foot by 59-foot area.

To simulate conditions of system operation, an extraction point was installed through the structural slab. The temporary extraction point consisted of a 4-inch diameter penetration through the slab extending approximately six inches below slab depth simulating the conditions applied in the installation of a permanent extraction point. Simulation of extraction conditions was accomplished by applying vacuum pressure to the temporary extraction point with a commercial vacuum capable of producing 70 cubic feet per minute (CFM) air flow at the unrestricted opening on the unit.

The data showed the extension of the area of influence to the south at a range of 25 feet from the temporary extraction point. Based on data collection, a radius of influence of 25 feet per suction point was established. Subsequent to data collection, all structural slab penetrations were sealed with hydraulic cement.

Utilizing data collected during the pilot test, system design parameters were calculated. Based on the square footage and the observed radius of vacuum influence, seven extraction points were included in sub-slab depressurization system construction.

Each permanent extraction point consists of a 3-inch diameter penetration through the structural slab extending approximately four inches beneath the base elevation of the slab. Prior to installation of the extraction points, base gravel was removed six inches below and laterally from the final location of piping. Extraction piping consists of 3-inch diameter Schedule 40 PVC. The extraction piping is sealed to the slab utilizing Sonolastic NP-1 caulking specifically formulated to eliminate vapor intrusion. The extraction piping extends vertically and is connected to a common manifold and exits through the roof of the structure. During the process of connecting the individual extraction points to the common manifold, the number of connection fittings utilized was minimized to prevent unnecessary friction loss as air passes through the system. The pitch of horizontal piping was set to allow for drainage of condensation to the individual extraction points.

Prior to exiting the structure, extraction piping was fitted with a 3-inch diameter fire collar at the exit interface. The piping was then sealed on the roofline to prevent moisture intrusion to the structure. The vapor extraction piping was connected to two vacuum blowers in series located outside the conditioned space of the subject structure in an enclosure to prevent damage from environmental conditions. The vacuum blower series (Radonaway RP 265) consists of two sealed housing blowers commonly used in Radon reduction applications. The vacuum blower

assembly is rated to create a total of approximately 590 CFM of total air movement. The total CFM rating of the blower series is applied to the seven extraction points allowing for greater air movement per extraction point relative to the flow removed during pilot test activities. Accounting for friction loss in system piping, the blower assembly is rated create an approximate 17 percent increase in influence per point as compared to the equipment used in pilot test activities. The vacuum blower series is installed in-line in the 3-inch diameter extraction piping. The extracted air stream passes through the vacuum blowers and is vented approximately five feet above the roofline of the subject structure.

Procedures for operating and maintaining the SSDS system are documented in the Operation and Maintenance Plan (Section 4 of this SMP). Procedures for monitoring the system are included in the Monitoring Plan (Section 3 of this SMP). The Monitoring Plan also addresses severe condition inspections in the event that a severe condition, which may affect controls at the site, occurs.

2.2.2 Criteria for Completion of Remediation/Termination of Remedial Systems

Generally, remedial processes are considered completed when effectiveness monitoring indicates the remedy has achieved the remedial action objectives identified by the decision document. The framework for determining when remedial processes are complete is provided in Section 6.6 of NYSDEC DER-10.

2.2.2.1 Sub-Slab Depressurization System (SSDS)

The active SSDS will not be discontinued unless prior written approval is granted by NYSDEC. In the event that future monitoring data indicates the SSDS is no longer required, a proposal to discontinue the SSDS will be submitted by the property owner to NYSDEC and NYSDOH. The SSDS is currently not sampled as the system is operating as a preventative measure and post system start-up data revealed results beneath any relevant guidance value.

2.2.2.2 Monitored Natural Attenuation

Groundwater monitoring activities to assess natural attenuation will continue, as determined by NYSDEC, until residual groundwater concentrations are found to be consistently below NYSDEC standards or have become asymptotic at an acceptable level over an extended period. Monitoring will continue until permission to discontinue is granted in writing by NYSDEC. If groundwater contaminant levels become asymptotic at a level that is not acceptable to NYSDEC, additional treatment and/or control measures will be evaluated.

2.3 Institutional Controls

A series of Institutional Controls is required by the deed restriction to:

- Implement, maintain, and monitor Engineering Control Systems;
- Prevent possible future exposure to contamination by controlling disturbances of the subsurface contamination; and,
- Limit the use and development of the Site to Commercial or Industrial uses only;

These Institutional Controls are:

- Compliance with the deed restriction and this SMP by the Grantor and the Grantor's successors and assigns;
- All Engineering Controls must be operated and maintained as specified in this SMP;
- All Engineering Controls on the Controlled Property must be inspected at a frequency and in a manner defined in the SMP;
- Groundwater and soil vapor and other environmental or public health monitoring must be performed as defined in this SMP;
- Data and information pertinent to Site Management of the Controlled Property must be reported at the frequency and manner defined in this SMP.

Institutional Controls identified in the deed restriction may not be discontinued without an amendment to or extinguishment of the deed restriction. The site has a series of Institutional Controls in the form of site restrictions. Adherence to these Institutional Controls is required by the deed restriction. Site restrictions that apply to the Controlled Property are:

- The property subject to the Declaration of Covenants and Restrictions is as shown in the figure included in **Appendix A**.
- Unless prior written approval by NYSDEC or, if NYSDEC shall no longer exist, any New York State agency or agencies subsequently created to protect the environment of the State and the health of the State's citizens, hereinafter referred to as "the Relevant Agency," is first obtained, where contamination remains at the property subject to the provisions of the Site Management Plan ("SMP"), there shall be no construction, use or occupancy of the Property that results in the disturbance or excavation of the property which threatens the integrity of the engineering controls or which results in unacceptable human exposures to contaminated soils.
- The property owner shall not disturb, remove, or otherwise interfere with the installation, use, operation, and maintenance of engineering controls required for the remedy, which are described in the SMP, unless in each instance the owner first obtains a written waiver of such prohibition from NYSDEC or Relevant Agency.
- The owner of the Property shall prohibit the Property from ever being used for purposes other than for Commercial and Industrial use as described in 6 NYCRR Part 375-1.8(g)(2)(iii) and 6 NYCRR Part 375-1.8(g)(2)(iv), respectively, without the express written waiver of such prohibition by NYSDEC or Relevant Agency.
- The owner of the Property shall prohibit the use of groundwater underlying the property without treatment rendering it safe for drinking water or industrial purposes, as

appropriate, unless the user first obtains permission to do so from NYSDEC or Relevant Agency.

- The Property owner shall provide a periodic certification, prepared and submitted by a professional engineer or environmental professional acceptable to NYSDEC or Relevant Agency, which will certify that the institutional and engineering controls put in place are unchanged from the previous certification, comply with the SMP, and have not been impaired. (The certification shall be submitted annually, or an alternate period of time that NYSDEC may allow and will be made by an expert that the NYSDEC finds acceptable).
- The property owner shall continue in full force and effect any institutional and engineering controls required for the Remedy and maintain such controls, unless the owner first obtains permission to discontinue such controls from NYSDEC or Relevant Agency, in compliance with the approved SMP, which is incorporated and made enforceable hereto, subject to modifications as approved by NYSDEC or Relevant Agency.
- This declaration is and shall be deemed a covenant that shall run with the land and shall be binding upon all future owners of the property, and shall provide that the owner and its successors and assigns consent to enforcement by NYSDEC or Relevant Agency of the prohibitions and restrictions that NYSDEC or Relevant Agency requires to be recorded and the owner and its successors and assigns hereby covenant not to contest the authority of the NYSDEC or Relevant Agency to seek enforcement.
- Any deed of conveyance of the Property, any portion thereof, shall recite, unless NYSDEC or Relevant Agency has consented to the termination of such covenants and restrictions that said conveyance is subject to this Declaration of Covenants and Restrictions.

In addition:

- The potential for vapor intrusion must be evaluated for any buildings developed in the area noted on the figure in **Appendix A**, and any impacts that are identified must be monitored or mitigated.
- Vegetable gardens and farming on the property are prohibited.
- Relevant inspection information will be included with the filed report in agreement with the conditions of the deed restriction (Date filed, Liber and Page, Instrument number, etc.).
- NYSDEC retains the right to access such controlled Property at any time in order to evaluate the continued maintenance of any and all controls.

2.3.1 Excavation Work Plan

The site has been remediated for commercial and industrial use. Any future intrusive work that will penetrate the asphalt paving, or encounter or disturb the remaining contamination, will be performed in compliance with the Excavation Work Plan (EWP) that is attached as **Appendix D** to this SMP. Even though the near surface contaminated soils have been removed at the Site, it is prudent to follow certain precautions if and when any future excavation activities are undertaken in the restricted area of the Site. Saw cutting and removal of asphalt paving or repairs to the asphalt paving will not require the implementation of the EWP. Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP) which will be completed before work commences at the Site by the contractor performing the excavation activities. Based on future changes to State and Federal health and safety requirements, and specific methods employed by future contractors, the HASP and CAMP will be updated and re-submitted with the notification provided in Section A-1 of the EWP. Any intrusive construction work will be performed in compliance with the EWP, HASP and CAMP, and will be included in the periodic inspection and certification reports submitted under the Site Management Reporting Plan (See Section 5).

The site owner and associated parties preparing the remedial documents submitted to the State, and parties performing this work, are completely responsible for the safe performance of all intrusive work, the structural integrity of excavations, proper disposal of excavation water, control of runoff from open excavations into remaining contamination, and for structures that may be affected by excavations (such as building foundations and bridge footings). The site owner will ensure that site development activities will not interfere with, or otherwise impair or compromise the engineering controls described in this SMP.

All near surface soil contamination has been removed from the Site during the Clayton Services Group, Inc., December 2006 excavation. The remaining contamination at the Site consists of a plume of dissolved phase groundwater contamination as depicted on **Figures 9 & 10**. The deed restricted area of the Site (see **Appendix A**) is currently an asphalt paved surface parking lot. Depth to groundwater in the deed restricted area varies from about 6 to 10 feet below ground surface (see **Table 1**).

2.3.2 Soil Vapor Intrusion Evaluation

Prior to the construction of any enclosed structures located over areas that contain remaining contamination and the potential for soil vapor intrusion (SVI) has been identified (see deed restricted area **Appendix A**), an evaluation of SVI potential will be performed to determine whether any mitigation measures are necessary to eliminate potential exposure to vapors in the proposed structure. Alternatively, an SVI mitigation system may be installed as an element of the building foundation without first conducting an investigation. This mitigation system will include a vapor barrier and passive sub-slab depressurization system that is capable of being converted to an active system.

Prior to conducting an SVI investigation or installing a mitigation system, a work plan will be developed and submitted to the NYSDEC and NYSDOH for approval. This work plan will be

developed in accordance with the most recent NYSDOH “Guidance for Evaluating Vapor Intrusion in the State of New York”. Measures to be employed to mitigate potential vapor intrusion will be evaluated, selected, designed, installed, and maintained based on the SVI evaluation, the NYSDOH guidance, and construction details of the proposed structure.

Preliminary (unvalidated) SVI sampling data will be forwarded to the NYSDEC and NYSDOH for initial review and interpretation. Upon validation, the final data will be transmitted to the agencies, along with a recommendation for follow-up action, such as mitigation. SVI sampling results, evaluations, and follow-up actions will also be summarized in the next Periodic Review Report.

2.4 Inspections and Notifications

2.4.1 Inspections

Inspections of all remedial components installed at the site will be conducted at the frequency specified in the SMP Monitoring Plan schedule. A comprehensive site-wide inspection will be conducted annually, regardless of the frequency of the Periodic Review Report. The inspections will determine and document the following:

- Whether Engineering Controls continue to perform as designed;
- If these controls continue to be protective of human health and the environment;
- Compliance with requirements of this SMP and the deed restriction;
- Achievement of remedial performance criteria;
- Sampling and analysis of appropriate media during monitoring events;
- If site records are complete and up to date; and
- Changes, or needed changes, to the remedial or monitoring system;

Inspections will be conducted in accordance with the procedures set forth in the Monitoring Plan of this SMP (Section 3). The reporting requirements are outlined in the Periodic Review Reporting section of this plan (Section 5).

If an emergency, such as a natural disaster or an unforeseen failure of any of the ECs occurs, an inspection of the site will be conducted within 5 days of the event to verify the effectiveness of the EC/ICs implemented at the site by a qualified environmental professional as determined by NYSDEC.

2.4.2 Notifications

Notifications will be submitted by the property owner to the NYSDEC as needed for the following reasons:

- 60-day advance notice of any proposed changes in site use that are required under the terms of the Order on Consent, 6NYCRR Part 375, and/or Environmental Conservation Law.
- 7-day advance notice of any proposed ground-intrusive activities pursuant to the Excavation Work Plan.

- Notice within 48-hours of any damage or defect to the foundation, structures or engineering control that reduces or has the potential to reduce the effectiveness of an Engineering Control and likewise any action to be taken to mitigate the damage or defect.
- Verbal notice by noon of the following day of any emergency, such as a fire, flood, or earthquake that reduces or has the potential to reduce the effectiveness of Engineering Controls in place at the site, with written confirmation within seven days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public.
- Follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action shall be submitted to the NYSDEC within 45 days and shall describe and document actions taken to restore the effectiveness of the ECs.

Any change in the ownership of the site or the responsibility for implementing this SMP will include the following notifications:

- At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser has been provided with a copy of the Order on Consent, and all approved work plans and reports, including this SMP;
- Within 15 days after the transfer of all or part of the site, the new owner’s name, contact representative, and contact information will be confirmed in writing.

2.5 Contingency Plan

Emergencies may include injury to personnel, fire or explosion, environmental release, or serious weather conditions. In case such an emergency does occur, the following sections outline a listing of appropriate contact information to enact emergency response services.

2.5.1 Emergency Telephone Numbers

In the event of any environmentally related situation or unplanned occurrence requiring assistance, the Owner or Owner’s representative(s) should contact the appropriate party from the contact list below. For emergencies, appropriate emergency response personnel should be contacted. Prompt contact should also be made to Environmental Products & Services of Vermont, Inc. Since there are no owner occupied store fronts at the Site, the emergency contact information will be stored at SRK and EPSVT.

Table 2.5.1a: Emergency Contact Numbers

Medical, Fire, and Police:	911
One Call Center: utility mark out – 3 day notice required	811
Poison Control Center:	(800) 222-1222
Pollution Toxic Chemical Oil Spills:	(800) 424-8802
NYSDEC Spills Hotline	(800) 457-7362

Table 2.5.1b: Contact Numbers

Environmental Products & Services of Vermont, Inc.	1-800-843-8265
SRK Colvin-Eggert Plaza Associates, LP	716-833-4986
NYSDEC Region 9	716-851-7220

* Note: Contact numbers subject to change and should be updated as necessary

2.5.2 Map and Directions to Nearest Health Facility

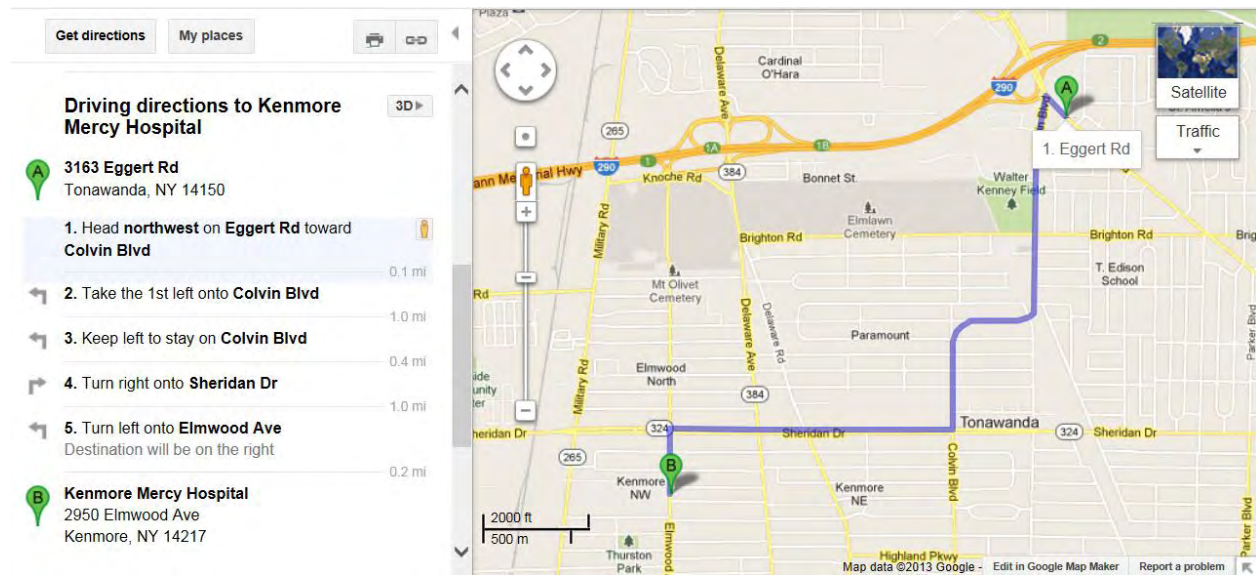
Site Location: 3163 Colvin Boulevard

Nearest Hospital Name: Kenmore Mercy Hospital

Hospital Location: 2950 Elmwood Avenue, Kenmore, NY 14217

Hospital Telephone: 716-447-6100

Directions to the Hospital:



2.5.3 Response Procedures

As appropriate, the fire department and other emergency response group will be notified immediately by telephone of the emergency. The emergency telephone number list is found at the beginning of this Contingency Plan (**Table 2.5.1a**). The list will also be posted prominently at SRK and EPSVT and made readily available to all personnel at all times.

This should include a description of:

- Procedures for spills;
- Evacuation plans;
- Amendments to the contingency plan.

3.0 Site Monitoring Plan

3.1 Introduction

3.1.1 General

The Monitoring Plan describes the measures for evaluating the performance and effectiveness of the remedy to reduce or mitigate contamination at the site, the soil cover system, and all affected site media identified below. Monitoring of other Engineering Controls is described in Chapter 4, Operation, Monitoring and Maintenance Plan. This Monitoring Plan may only be revised with the approval of NYSDEC.

3.1.2 Purpose and Schedule

This Monitoring Plan describes the methods to be used for:

- Sampling and analysis of all appropriate media (e.g., groundwater, soils);
- Assessing compliance with applicable NYSDEC standards, criteria and guidance, particularly ambient groundwater standards and Part 375 SCOs for soil;
- Assessing achievement of the remedial performance criteria;
- Evaluating site information periodically to confirm that the remedy continues to be effective in protecting public health and the environment; and
- Preparing the necessary reports for the various monitoring activities.

To adequately address these issues, this Monitoring Plan provides information on:

- Sampling locations, protocol, and frequency;
- Information on all designed monitoring systems (e.g., well logs);
- Analytical sampling program requirements;
- Reporting requirements;
- Quality Assurance/Quality Control (QA/QC) requirements;
- Inspection and maintenance requirements for monitoring wells;
- Monitoring well decommissioning procedures; and
- Annual inspection and periodic certification.

Monitoring of the performance of the remedy and overall reduction in contamination on-site will be conducted every three years. The frequency thereafter will be determined by NYSDEC. Trends in contaminant levels in soil and/or groundwater in the affected areas, will be evaluated to determine if the remedy continues to be effective in achieving remedial goals. Monitoring programs are summarized in **Table 3.1.2** below.

Table 3.1.2: Monitoring/Inspection Schedule

Monitoring Program	Frequency*	Matrix	Analysis
<i>Groundwater Monitoring</i>	5 years (Last done 12/2011)	Liquid	USEPA Method 8260 Full List, Temperature, pH, DO
<i>Surface Water Monitoring</i>	NA	NA	NA
<i>Soil Monitoring</i>	If disturbed in deed restricted area	Solid	USEPA Method 8260 Full List, Disposal Parameters (if necessary)

** The frequency of events will be conducted as specified until otherwise approved by NYSDEC and NYSDOH*

No soil cover monitoring will be required because the site is an asphalt paved parking lot. Periodic maintenance to asphalt will occur as necessary. Appropriate monitoring programs are discussed in section 3.3 below. A schedule for implementation of the various tasks and duties associated with the SMP is listed below, along with a schedule for reporting requirements:

- **Annual Site Wide Inspection** (includes monitoring well inspection and engineering control inspection (e.g., SSDS inspection). Site-wide inspections will be performed on a regular schedule at a minimum of one inspection per calendar year. Site-wide inspections will also be performed after all severe weather conditions that may affect Engineering Controls or monitoring devices. During these inspections, an inspection form will be completed (**Appendix D**).
- If an emergency, such as a natural disaster or an unforeseen failure of any of the ECs occurs, an inspection of the site will be conducted within 5 days of the event to verify the effectiveness of the EC/ICs implemented at the site by a qualified environmental professional as determined by NYSDEC. Checklists or forms (see **Appendices D, E, F**) will be completed during each routine maintenance event.
- Verbal notice by noon of the following day of any emergency, such as a fire, flood, or earthquake that reduces or has the potential to reduce the effectiveness of Engineering Controls in place at the site, with written confirmation within seven days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public.
- Follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action shall be submitted to the NYSDEC within 45 days and shall describe and document actions taken to restore the effectiveness of the ECs.
- **Periodic Review Report** will be submitted to the Department every year, beginning fifteen months after the acceptance of the SMP by NYSDEC or Relevant Agency. The forms completed (**Appendices D, E, F**) during the annual site wide inspection, emergency inspections, groundwater sampling events, institutional control inspections, engineering control inspections, or other relevant site work shall be included in the Periodic Review Report.
- **Groundwater sampling** of the required site monitoring wells will occur every five years. The first sampling event is proposed for June 2016. All monitoring results will be reported to NYSDEC in the Periodic Review Report. A **letter report** will also be prepared subsequent to each sampling event, as required by NYSDEC.

- **Institutional control** inspection will match the submittal date of the Periodic Review Report. The first inspection event is proposed for June 2016.
- **Excavation work** will be performed under the direction of the Excavation Work Plan (EWP), if necessary (see **Appendix B**). Repairs to the asphalt (grinding and removal of damaged asphalt) will not enact the EWP.

Notifications will be submitted by the property owner to the NYSDEC as needed for the following reasons:

- 60-day advance notice of any proposed changes in site use that are required under the terms of the Order on Consent, 6NYCRR Part 375, and/or Environmental Conservation Law.
- 7-day advance notice of any proposed ground-intrusive activities pursuant to the Excavation Work Plan.
- Notice within 48-hours of any damage or defect to the foundation, structures or engineering control that reduces or has the potential to reduce the effectiveness of an Engineering Control and likewise any action to be taken to mitigate the damage or defect.

Any change in the ownership of the site or the responsibility for implementing this SMP will include the following notifications:

- At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser has been provided with a copy of the Order on Consent, and all approved work plans and reports, including this SMP;
- Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing.

3.2 Soil Cover System Monitoring

The site does not have an engineered soil cover system. Currently the area of the deed restriction at the site is covered with an asphalt paved surface parking lot. Repairs to the asphalt parking lot will be made by the Property Owner when deemed necessary by the property owner. Repairs to the asphalt will not trigger the Excavation Work Plan (EWP) located in **Appendix B**.

3.3 Media Monitoring System

3.3.1 Groundwater Monitoring

A network of monitoring wells has been installed to monitor both up-gradient and down-gradient groundwater conditions at the site. **Figure 2** shows the locations of all site monitoring wells. The wells scheduled for sampling in Table 3.3.1a are located within the deed restricted area of the site, except for wells MW-3 S&D. During the groundwater sampling events, every accessible well will be gauged for depth to groundwater for the production of groundwater contour maps. No site wells (in the deed restricted area or non deed restricted areas) will be decommissioned without permission of NYSDEC or Relevant Agency.

Groundwater monitoring wells MW-1S&D through MW-8S&D were installed in accordance with the RI/IRM Work Plan submitted on October 28, 2008. Installation of monitoring wells MW-1S&D through MW-8S&D was completed from November 18 through November 24, 2008. After review of the data, NYSDEC requested (via email on January 15, 2009) the installation of six additional monitoring wells (i.e., MW-9S&D through MW-14S&D). Installation of monitoring wells MW-9S&D through MW-13S&D and MW-14S was completed from January 19 through January 21, 2009. Installation of MW-14D was completed on February 2, 2009.

EPSVT utilized the Solinst Model 403 Continuous Multichannel Tubing (CMT) Multilevel System for nested well installation in Monitoring wells MW-1S&D through MW-13S&D. With this system, up to three zones can be monitored within a single borehole; however, EPSVT utilized two monitoring zones per well cluster at this site (i.e., S and D). One monitoring zone (i.e., MW-1S, MW-2S, etc.) was constructed from approximately 7 to 15 feet bgs. The purpose of this zone is to monitor the water table (shallow groundwater) and to allow for anticipated seasonal water table fluctuations. The other monitoring zone (i.e., MW-1D, MW-2D, etc.) was constructed from approximately 25 to 30 feet bgs to monitor the quality of groundwater occurring at the interface of the upper sandy layer with the dense glacial lodgment till unit below.

A sand pack was placed from approximately 30 feet bgs to approximately 25 feet bgs in each well MW-1S&D through MW-13S&D. This was followed by a bentonite seal placed from approximately 25 feet bgs to approximately 15 feet bgs. The bentonite was followed by another sand pack placed from approximately 15 feet bgs to approximately 7 feet bgs. This sand pack was followed by another bentonite seal placed from approximately 6 feet bgs to approximately 2 feet bgs. The well cluster was finished with a flush mount protective road box in a concrete well pad. A typical nested monitoring well schematic is shown on **Figure 3**.

Because MW-14S&D were installed in a limited access area in the grassy area behind the BACW, a rubber tracked Geoprobe 54-DT direct push drill rig was used to install the well MW-14S. The site geology prevented the Geoprobe rig from advancing the tooling beyond 15 feet bgs. A 10-foot length of 1.5-inch I.D. pre-packed well screen connected to a 5-foot section of 1.5-inch well riser was installed in the borehole as MW-14S. An all-terrain vehicle equipped with a HSA drill rig was utilized to install a boring to 30 feet bgs for the installation of the neighboring deep well. A 5-foot length of 1.5-inch I.D. pre-packed well screen connected to a 25-foot section of 1.5-inch well riser was installed in the borehole (as MW-14D).

On March 3 and 4, 2010, EPSVT mobilized to the site for the installation of two shallow wells (i.e., MW-17S and MW-18S) south of MW-10S&D at the request of NYSDEC. One 2-inch ID monitoring well was installed in each boring (two borings/wells total). MW-17S was screened from approximately 10 to 26 feet bgs. MW-18S was screened from approximately 10 to 20 feet bgs. A sand pack was placed from the bottom of each well to approximately 8 feet bgs. The remainder of the borehole was sealed using tremie-grout to approximately 2 feet bgs, and then with sand to near surface. The remediation wells were finished with a flush-mount protective road box in a concrete well pad. The locations of MW-17S and MW-18S are shown on **Figure**

2. Boring logs for the IRM installed groundwater monitoring wells are included in **Appendix G**. **Table 1** presents a Summary of Historical Groundwater Elevations. **Figure 6** presents the Shallow Groundwater Elevation Map. **Figure 7** presents the Deep Groundwater Elevation Map.

Groundwater sampling will follow the protocols established in the NYSDEC approved Monitored Natural Attenuation Work Plan. A select list of wells designed to provide perimeter monitoring supplemented by wells that have shown relatively elevated historical chlorinated hydrocarbon concentrations in groundwater nearer to the original source area of contamination will be sampled on the five year sampling interval. The perimeter or sentinel wells designated as MW-10S, MW-10D, MW-11S, MW-11D, MW-12S and MW-12D along with monitoring points MW-1S, MW-3S, MW-3D, and MW-8S will be sampled. Groundwater elevation data will be collected during the sampling event from all existing wells on-site and will be utilized to produce groundwater elevation maps. Groundwater samples collected from each of these wells will be submitted for laboratory analysis for volatile organic compound (VOC) analysis including the compounds of specific concern in accordance with USEPA Method 8260 with the full list of applicable compounds reported. The results of the December 2011 MNA sampling event (last sampling event performed at the Site) are presented in **Figure 9** (Shallow Chlorinated Solvent Concentration Map) and **Figure 10** (Deeper Chlorinated Solvent Concentration Map). The list of wells to be sampled is also presented below in **Table 3.3.1a**. **Table 3.3.1b** depicts the analyses to be performed. Temperature, pH, and Dissolved Oxygen (DO) will be field collected parameters. The next monitoring well sampling event is scheduled for December 2016. EPSVT suggests moving the next sampling date from December 2016 to June 2016, to avoid potential inclement weather (snow) which may make some of the wells listed below inaccessible for sampling.

Table 3.3.1a: Wells to be sampled

MW-1S	MW-11S
MW-3S	MW-11D
MW-3D	MW-12S
MW-8S	MW-12D
MW-10S	
MW-10D	

Table 3.3.1b: Analytes to be tested

- | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> ▪ USEPA Method 8260 Full List Parameters ▪ Temp (°C) ▪ Dissolved Oxygen (mg/l) ▪ pH |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|

The sampling frequency may be modified with the approval NYSDEC. The SMP will be modified to reflect changes in sampling plans approved by NYSDEC.

3.3.2 Sampling Protocol

A full round of water levels will be measured from all accessible wells during the sample collection events for the generation of groundwater elevation maps. Low-flow sampling protocols (i.e., the use of a peristaltic pump) will be employed during the collection of

groundwater samples, as necessary. All analytical samples will be packed on ice and sent via express courier to a qualified analytical laboratory. Samples will be analyzed via USEPA Method 8260 Full List Parameters.

All monitoring well sampling activities will be recorded in a field book and a groundwater-sampling log presented in **Appendix C**. Other observations (e.g., well integrity, etc.) will be noted on the well sampling log. The well sampling log will serve as the inspection form for the groundwater monitoring well network.

3.3.3 Monitoring Well Repairs, Replacement and Decommissioning

If bio-fouling or silt accumulation occurs in the groundwater monitoring wells, the wells will be physically agitated/surged and redeveloped. Additionally, monitoring wells will be properly decommissioned and replaced (as per the Monitoring Plan), if an event renders the wells unusable.

Repairs and/or replacement of wells in the monitoring well network will be performed based on assessments of structural integrity and overall performance. The NYSDEC and property owner will be notified prior to any repair or decommissioning of monitoring wells for the purpose of replacement, and the repair or decommissioning and replacement process will be documented in the subsequent periodic report. Well decommissioning without replacement will be done only with the prior approval of NYSDEC. Well abandonment will be performed in accordance with NYSDEC's "Groundwater Monitoring Well Decommissioning Procedures." Monitoring wells that are decommissioned because they have been rendered unusable will be reinstalled in the nearest available location, unless otherwise approved by the NYSDEC. Wells MW-13S&D have already been approved for decommissioning; however, they are currently still intact.

3.3.4 Surface Water Monitoring

Surface water at the site is collected via asphalt paved surfaces and storm water catch basins, which discharge to adjacent municipal storm drains. No surface water monitoring is necessary at the site.

Any liquids produced during excavation dewatering and groundwater monitoring well purge and development waters, will be handled, transported and disposed in accordance with applicable local, State, and Federal regulations. At a minimum it will be containerized and sampled for USEPA Method 8260 Full List Parameters. Analytical results will be compared to NYSDEC TOGS 1.1.1 Class GA Groundwater Standards, for determination of disposition of the containerized groundwater.

3.3.5 Soil Monitoring

Excavation should be conducted under the guidelines of the SMP with proper notification to SRK Associates and NYSDEC. Any excavated soil will require proper handling, management, sampling, analysis, and disposal methods. All excavated soils within the deed restricted area of the site must be at a minimum, staged on plastic sheeting and covered. Representative soil

samples will be collected of the excavated soil. The number of samples collected will be determined by the volume of excavated soil following NYS DER 10 regulations. Samples will be submitted for laboratory analysis via USEPA Method 8260 Full List Parameters. Additionally, excavation events and the results will be recorded to the Site-wide Inspection form (**Appendix D**) and Record of Site Inspections form (**Appendix E**).

3.4 Site-wide Inspection

Site-wide inspections will be performed on a regular schedule at a minimum of one inspection per calendar year. Site-wide inspections will also be performed after all severe weather conditions that may affect Engineering Controls or monitoring devices. During these inspections, an inspection form will be completed (**Appendix D**). The form will compile sufficient information to assess the following:

- Compliance with all ICs, including site usage;
- An evaluation of the condition and continued effectiveness of ECs;
- General site conditions at the time of the inspection;
- The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection;
- Compliance with permits and schedules included in the Operation and Maintenance Plan; and,
- Confirmation that site records are up to date.

3.5 Monitoring Quality Assurance/Quality Control

A formal Quality Assurance Project Plan (QAPP) has not been prepared for the site. All sampling at the site will follow industry accepted standard sampling protocols.

3.6 Monitoring Reporting Requirements

Forms and any other information generated during regular monitoring events and inspections will be kept on file at SRK and EPSVT. All forms, and other relevant reporting formats used during the monitoring/inspection events, will be:

- Subject to approval by NYSDEC; and,
- Submitted at the time of the Periodic Review Report, as specified in the Reporting Plan of this SMP.

All monitoring results will be reported to NYSDEC on a periodic basis in the Periodic Review Report. A letter report will also be prepared subsequent to each sampling event, as required by NYSDEC. The report (or letter) will include, at a minimum:

- Date of event;
- Personnel conducting sampling;
- Description of the activities performed;
- Type of samples collected (e.g., sub-slab vapor, groundwater, soil, etc.);

- Copies of all field forms completed (e.g., well sampling logs, chain-of-custody documentation, etc.);
- Sampling results in comparison to appropriate standards/criteria;
- A figure illustrating sample type and sampling locations;
- Copies of all laboratory data sheets and the required laboratory data deliverables required for all points sampled (to be submitted electronically in the NYSDEC identified format);
- Any observations, conclusions, or recommendations; and,
- A determination as to whether groundwater conditions have changed since the last reporting event.

Data will be reported in hard copy or digital format as determined by NYSDEC. A summary of the monitoring program deliverables are summarized in **Table 3.6** below.

Table 3.6: Schedule of Monitoring/Inspection Reports

Task	Reporting Frequency*
<i>Groundwater Sampling</i>	5 years
<i>Annual Site-wide Inspection</i>	Annual
<i>Institutional Control Inspection</i>	5 Years

** The frequency of events will be conducted as specified until otherwise approved by NYSDEC*

4.0 Operation and Maintenance Plan

4.1 Introduction

This Operation and Maintenance Plan describes the measures necessary to operate, monitor and maintain the mechanical components of the remedy selected for the site. Currently, the only engineering control in effect at the Site is a SSDS system operating in the northern portion of the East Shops (US Renal Care). This Operation and Maintenance Plan:

- Includes the steps necessary to allow individuals unfamiliar with the site to operate and maintain the SSDS system;
- Includes an operation and maintenance contingency plan; and,
- Will be updated periodically to reflect changes in site conditions or the manner in which the SSDS systems are operated and maintained.

Information on non-mechanical Engineering Controls (i.e. soil cover system) is provided in Section 3 - Engineering and Institutional Control Plan. A copy of this Operation and Maintenance Plan, along with the complete SMP, will be kept at SRK and EPSVT. This Operation and Maintenance Plan is not to be used as a stand-alone document, but as a component document of the SMP.

4.2 Engineering Control System Operation and Maintenance

4.2.1 Scope

The SSDS system currently operating in the northern portion of the East Shops building requires no periodic maintenance, other than a periodic check to ensure the system is operational. The blower which powers the system is typically used in radon reduction systems, and is a continuous duty in-line fan. Two in-line fans are installed in a steel housing located on the roof of the East Shops (above the US Renal Care tenant).

4.2.2 System Start-Up and Testing

There are no special requirements for system start up and testing. The SSDS system operates continuously and a periodic check to ensure the system blowers are operational is all that is required.

4.2.3 System Operation: Routine Operation Procedures

The SSDS system does not require any routine maintenance. A periodic check to ensure the in-line blowers are operational is all that is required. Inspections will be performed by accessing the roof of the East Shops building, and accessing the locked cabinet on the roof. A key for the locking front panel door of the equipment enclosure can be obtained from SRK. As the inspection is anticipated to be performed annually, the locking mechanism for the front panel enclosure should be lubricated during each site inspection to ensure proper operation.

- The two in-line blowers should be inspected for proper operation. This can be achieved by visual inspection of the blowers, auditory inspection, and tactile inspection of each blower for a slight vibration indicating the fan located with the lower unit is rotating normally. A sample port located on the discharge side of the blowers should have a slight positive pressure. In addition, a vacuum gauge is located within the enclosure attached to the SSDS piping. The vacuum data should be collected during every site inspection and compared to previous readings to confirm proper operation of the SSDS blowers.

4.2.4 System Operation: Routine Equipment Maintenance

Warning devices which indicate the SSDS system is not operational or is experiencing reduced system effectiveness due to system damage include vacuum gauges. The vacuum gauges are located at two locations inside the US Renal Care tenant space attached to SSDS piping, which are accessible for inspection, and in the SSDS blower enclosure located on the roof of the northern portion of the east shops attached to the SSDS piping. Vacuum readings will be recorded during the Site inspections to verify the SSDS is operational. The SSDS blowers are manufactured by Radonaway (Model RP 265, part number 23033-1). These are sealed bearing fans designed for years of maintenance free operation. If the SSDS blowers are not operational during a periodic site inspection, the remedy is to replace the defective blower unit(s), if standard troubleshooting (e.g., ensure electrical power for blowers is on, no obstructions in the SSDS piping) does not solve the blower operation issue. An Owners manual for the SSDS blowers is included in **Appendix H**.

4.2.5 System Operation: Non-Routine Equipment Maintenance

There is no non-routine maintenance required for the SSDS system.

4.3 Engineering Control System Performance Monitoring

4.3.1 Monitoring Schedule

A sub-slab depressurization system was installed below the northern portion of the “East Shops” structure. A portion of the deep zone dissolved groundwater plume was implied by existing water quality data to be located beneath the northern portion of the East Shops. A build-out of the northern East Shops space was underway for a new tenant (US Renal Care) and the sub-slab depressurization system was installed as a preventative measure to guard against possible future vapor issues in the northern portion of the East Shops building. The exhaust of the sub-slab depressurization system was sampled in December 2011 and analyzed for the presence of VOCs in accordance with USEPA Method TO-15. The exhaust was also sampled in January and February 2012. Sampling was conducted to evaluate the potential VOC concentrations in soil vapor extracted from beneath the northern portion of the “East Shops” structure. The initial SSDS exhaust sampling (December 22, 2011) yielded low VOC detections. Tetrachloroethylene was detected at a concentration of 4.7 micrograms per cubic meter, below the NYSDOH guideline value of 100 micrograms per cubic meter. Analytical results from the subsequent sampling events indicated a stable trend in Tetrachloroethylene (7.5 micrograms per cubic meter – January 12, 2012, and 8.8 micrograms per cubic meter – February 2012). Several compounds including Acetone, Dichlorodifluoromethane, Ethanol, Ethyl Acetate, and Methylene Chloride were detected in the SSDS exhaust samples and background samples indicating these detections were laboratory contaminants.

The low level contaminant concentrations found in soil vapor samples collected for TO-15 analysis from the sub-slab depressurization system exhaust are below the NYSDOH Soil Vapor Intrusion Guidance value of 100 micrograms per cubic meter. The documented soil vapor contaminant concentrations are in the range where a significant effect on indoor air quality is not anticipated. Furthermore, the collected soil vapor data are conservative based upon sample collection during an operational HVAC timeframe. Stack effect typically contributes to increased contaminant concentrations.

4.3.1 Monitoring Schedule

Inspection frequency is subject to change with the approval of the NYSDEC. Unscheduled inspections and/or sampling may take place when a suspected failure of the SSDS system has been reported or an emergency occurs that is deemed likely to affect the operation of the system. Monitoring deliverables for the SSDS system are specified later in this Plan.

4.3.2 General Equipment Monitoring

A visual inspection of the complete system will be conducted during the annual monitoring event. SSDS system components to be monitored include, but are not limited to, the following:

- SSDS blowers
- SSDS piping
- SSDS vacuum gauges (three)

- An inspection of accessible floor areas inside the northern portion of the East Shops for cracks will be performed. Any sealing of cracks in the floor will be recorded on the Site Wide Inspection Form (**Appendix D**).

The majority of the SSDS piping inside of the northern portion of the East Shops is not accessible, except for two locations where vacuum gauges are installed for observing system vacuum to ensure the SSDS blowers are operational. SSDS piping was incorporated internally into walls and above the ceiling of the US Renal Care office space in the East Shops. SSDS piping is Schedule 40 PVC pipe, glued joints, and requires no maintenance. SSDS blowers are located in a locking enclosure on the roof of the northern portion of the east shops. A third vacuum gauge is located in the SSDS blower enclosure on the roof of the East Shops.

4.3.3 System Monitoring Devices and Alarms

There are three vacuum gauge system monitoring devices associated with the SSDS system. There are no system alarms. Operational problems will be noted in the subsequent Periodic Review Report.

4.3.4 Sampling Event Protocol

There are no scheduled sampling events for the SSDS system.

4.4 Maintenance

Maintenance reports and any other information generated during regular operations at the site will be kept on-file at SRK and EPSVT offices, as there is no on-site storage. All reports, forms, and other relevant information generated will be available upon request to the NYSDEC and submitted as part of the Periodic Review Report, as specified in the Section 5 of this SMP.

4.4.1 Routine Maintenance Reports

Checklists or forms (see **Appendices D, E, F**) will be completed during each routine maintenance event. Checklists/forms will include, but not be limited to the following information:

- Date;
- Name, company, and position of person(s) conducting maintenance activities;
- Maintenance activities conducted;
- Any modifications to the system;
- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents noted (included either on the checklist/form or on an attached sheet); and,
- Other documentation such as copies of invoices for maintenance work, receipts for replacement equipment, etc., (attached to the checklist/form).

4.4.2 Non-Routine Maintenance Reports

During each non-routine maintenance event, a form will be completed which will include, but not be limited to, the following information:

- Date;
- Name, company, and position of person(s) conducting non-routine maintenance/repair activities;
- Presence of leaks;
- Date of leak repair;
- Other repairs or adjustments made to the system;
- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents (included either on the form or on an attached sheet); and,
- Other documentation such as copies of invoices for repair work, receipts for replacement equipment, etc. (attached to the checklist/form).

5.0 INSPECTIONS, REPORTING AND CERTIFICATIONS

5.1 Site Inspections

5.1.1 Inspection Frequency

All inspections will be conducted at the frequency specified in the schedules provided in the Monitoring Plan of this SMP. At a minimum, a site-wide inspection will be conducted annually. Inspections of remedial components will also be conducted when a breakdown of any treatment system component has occurred or whenever a severe condition has taken place, such as an erosion or flooding event that may affect the ECs.

5.1.2 Inspection Forms, Sampling Data, and Maintenance Reports

All inspections and monitoring events will be recorded on the institutional control form (**Appendix F**). Additionally, an inspection record form will be completed during the site-wide inspection (see **Appendix E**). These forms are subject to NYSDEC revision. All applicable inspection forms and other records, including all media sampling data and system maintenance reports, generated for the site during the reporting period will be provided in electronic format in the Periodic Review Report.

5.1.3 Evaluation of Records and Reporting

The results of the inspection and site monitoring data will be evaluated as part of the EC/IC certification to confirm that the:

- EC/ICs are in place, are performing properly, and remain effective;
- The Monitoring Plan is being implemented;
- Operation and maintenance activities are being conducted properly; and, based on the above items,

- The site remedy continues to be protective of public health and the environment and is performing as designed in the IRM and Remediation Completion Report (RCR).

5.2 Certification of Engineering and Institutional Controls

After the last inspection of the reporting period, Environmental Products & Services of Vermont, Inc. will prepare the following certification:

For each institutional or engineering control identified for the site, I certify that all of the following statements are true:

- The inspection of the site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under my direction;
- The institutional control and/or engineering control employed at this site is unchanged from the date the control was put in place, or last approved by the Department;
- Nothing has occurred that would impair the ability of the control to protect the public health and environment;
- Nothing has occurred that would constitute a violation or failure to comply with any site management plan for this control;
- 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;
- Use of the site is compliant with the deed restriction;
- The engineering control systems are performing as designed and are effective;
- 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 in this report is accurate and complete.

I certify that all information and statements in this certification form 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. Environmental Products & Services of Vermont, Inc, certifying as SRK Colvin-Eggert Plaza Associates, LP (SRK) Designated Site Representative has been authorized and designated by the site owners to sign this certification for the site. The signed certification will be included in the Periodic Review Report described below.

For each institutional identified for the site, I certify that all of the following statements are true:

- The institutional control employed at this site is unchanged from the date the control was put in place, or last approved by the Department; nothing has occurred that would impair the ability of the control to protect the public health and environment;
- Nothing has occurred that would constitute a violation or failure to comply with any site management plan for this control;
- 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;
- Use of the site is compliant with the deed restriction.
- The information presented in this report is accurate and complete.

I certify that all information and statements in this certification form 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. Environmental Products & Services of Vermont, Inc, certifying as SRK Colvin-Eggert Plaza Associates, LP (SRK) Designated Site Representative has been authorized and designated by the site owners to sign this certification for the site. The signed certification will be included in the Periodic Review Report described below.

5.3 Periodic Review Report

A Periodic Review Report (PRR) will be submitted to the Department with the first PRR to be submitted 18 months after the Release Letter or equivalent document is issued. The Department will determine the frequency of subsequent PRR submittal requirements. In the event that the site is subdivided into separate parcels with different ownership, a single Periodic Review Report will be prepared that addresses the site described in **Appendix A**. The report will be prepared in accordance with NYSDEC DER-10 and submitted within 30 days of the end of each certification period. Media sampling results will also be incorporated into the Periodic Review Report. The report will include:

- Identification, assessment and certification of all ECs/ICs required by the remedy for the site;
- Results of the required annual site inspections and severe condition inspections, if applicable;
- All applicable inspection forms and other records generated for the site during the reporting period in electronic format;
- A summary of any discharge monitoring data and/or information generated during the reporting period with comments and conclusions;
- Data summary tables and graphical representations of contaminants of concern by media (groundwater, soil vapor), which include a listing of all compounds analyzed, along with the applicable standards, with all exceedances highlighted. These will include a presentation of past data as part of an evaluation of contaminant concentration trends;
- Results of all analyses, copies of all laboratory data sheets, and the required laboratory data deliverables for all samples collected during the reporting period will be submitted electronically in a NYSDEC-approved format;

A site evaluation, which includes the following:

- The compliance of the remedy with the requirements of the site-specific IRM;
- The operation and the effectiveness of all treatment units, etc., including identification of any needed repairs or modifications;
- Any new conclusions or observations regarding site contamination based on inspections or data generated by the Monitoring Plan for the media being monitored;
- Recommendations regarding any necessary changes to the remedy and/or Monitoring Plan; and
- The overall performance and effectiveness of the remedy.
- A description of breakdowns and/or repairs along with an explanation for any significant downtime; A description of the resolution of performance problems;

- A summary of the performance, effluent and/or effectiveness monitoring; and
- Comments, conclusions, and recommendations based on data evaluation.

The Periodic Review Report will be submitted, in hard-copy format, to the NYSDEC Central Office and Regional Office in which the site is located, and in electronic format to NYSDEC Central Office, Regional Office and the NYSDOH Bureau of Environmental Exposure Investigation.

5.4 Corrective Measures Plan

If any component of the remedy is found to have failed, or if the periodic certification cannot be provided due to the failure of an institutional or engineering control, a corrective measures plan will be submitted to the NYSDEC for approval. This plan will explain the failure and provide the details and schedule for performing work necessary to correct the failure. Unless an emergency condition exists, no work will be performed pursuant to the corrective measures plan until it is approved by the NYSDEC.

6.0 List of Figures

Figure 1: Site Location Map

Figure 2: Site Map

Figure 3: Site Map with Well Locations

Figure 4: Site Map with IRM Well Locations

Figure 5: Site Map with Soil Vapor Monitoring Wells

Figure 6: Shallow Groundwater Elevation Map

Figure 7: Deep Groundwater Elevation Map

Figure 8: Clayton Services Group, Inc. Excavation Map

Figure 9: Shallow Chlorinated Solvent Concentration Map

Figure 10: Deep Chlorinated Solvent Concentration Map

7.0 List of Tables

Table 1: Historical Summary of Groundwater Elevations

Table 2: Historical Summary of Groundwater Sampling Results

Table 3: Contaminant Mass Calculations

8.0 List of Appendices

Appendix A: Deed Restriction and Map

Appendix B: Excavation Work Plan

Appendix C: Groundwater Sampling Log

Appendix D: Site Wide Inspection Form

Appendix E: Record of Site Inspection Form

Appendix F: Institutional Control Form

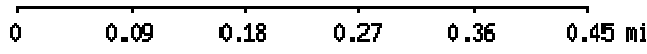
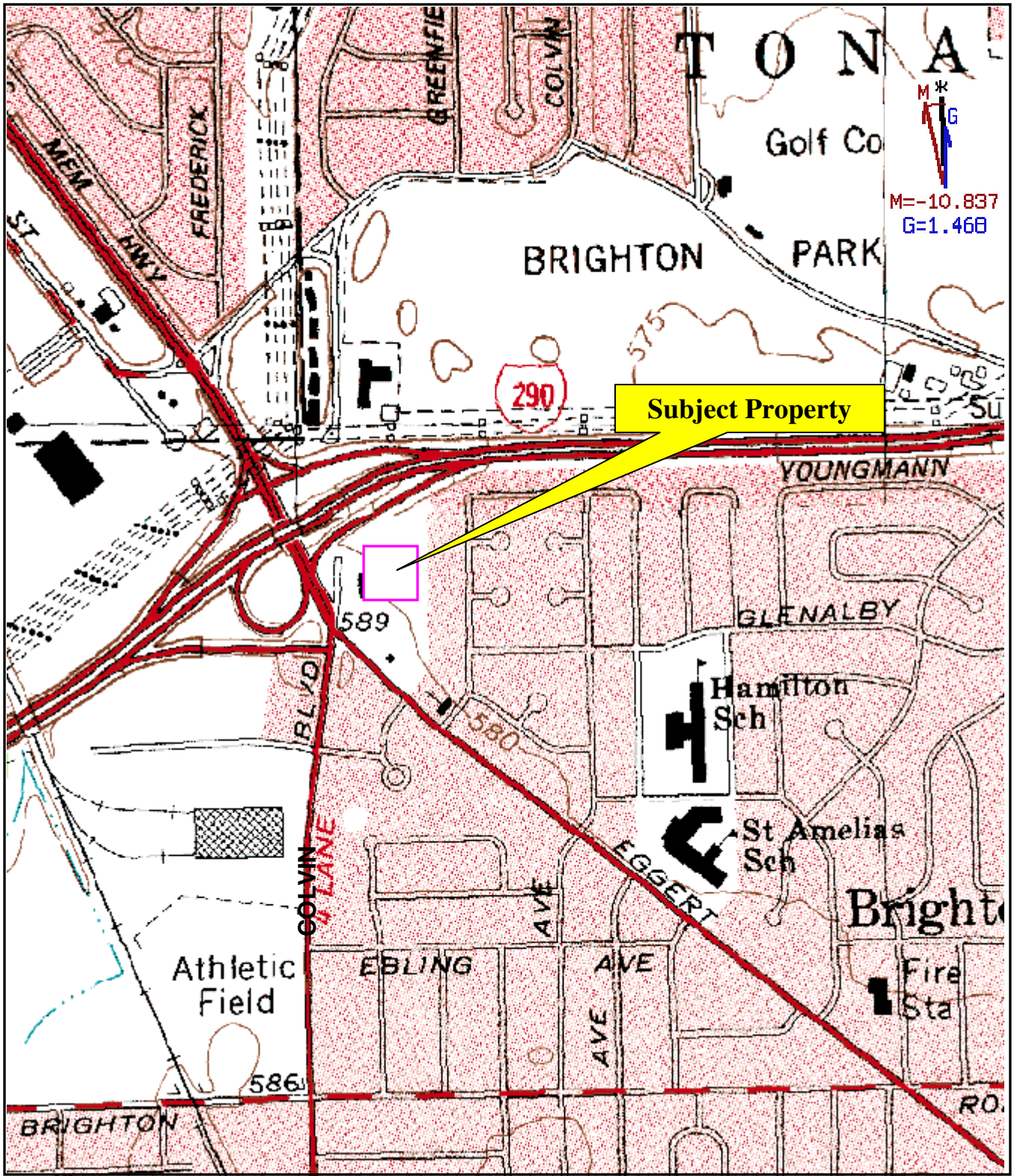
Appendix G: IRM Investigation Boring Logs

Appendix H: SSDS Blower Owner's Manual

9.0 List of Acronyms

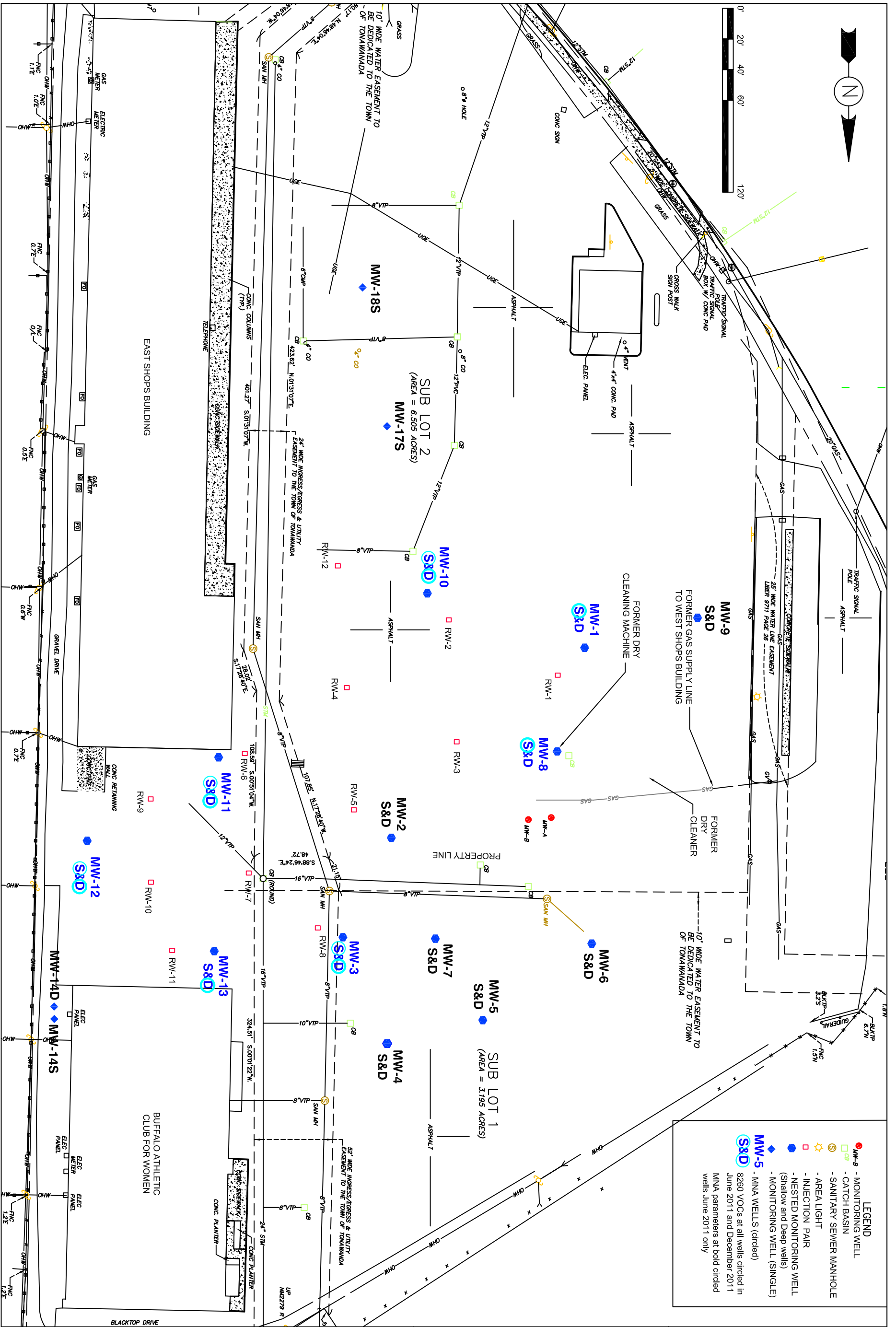
BGS – Below Ground Surface
DCE – Dichloroethane
DO – Dissolved Oxygen
CAMP – Community Air Monitoring Program
EC – Engineering Control
ECL Article 71, Title 36 – Environmental Conservation Law, Article 71, Title 36
EPSVT – Environmental Products & Services of Vermont, Inc.
EWP – Excavation Work Plan
HASP – Health and Safety Plan
IC – Institutional Control
ID – Inside Diameter
IRM – Interim Remedial Measure
MW- 1 – Monitoring Well
NYSDEC – New York State Department of Environmental Conservation
**NYSDEC DER 10 – New York State Department of Environmental Conservation
Department of Environmental Remediation**
NYS – New York State
NYSDOH – New York State Department of Health
PCE – Perchloroethylene
PID – Photoionization Detector
QA – Quality Assurance
QAPP – Quality Assurance Program Plan
QC – Quality Control
RAWP – Remedial Action Work Plan
RCR – Remediation Completion Report
RI – Remedial Investigation
ROD – Record of Decision
RW-1 - Remediation Well
SMP – Site Management Plan
SPDES – State Pollutant Discharge Elimination System
SRK – SRK Associates (a.k.a. SRK Colvin-Eggert Plaza Associates LP)
SSDS – Sub-Slab Depressurization System
SVE – Soil Vapor Extraction
TCE – Trichloroethane
USEPA – United States Environmental Protection Agency
VCP - Voluntary Cleanup Program
VOCs – Volatile Organic Compounds

FIGURES

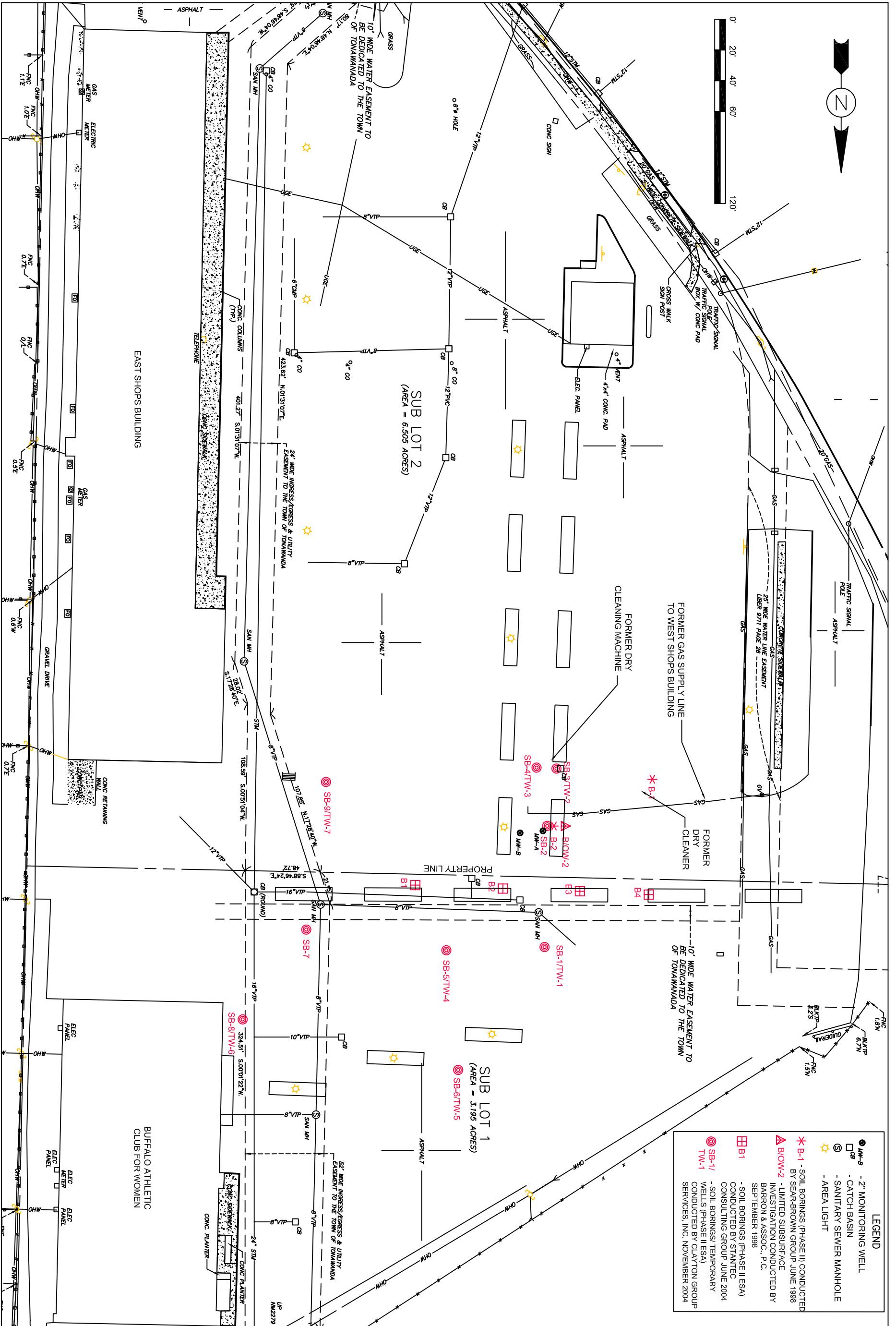


USGS Buffalo NE (NY) Quadrangle
 View Scale: 1:24,000 Date: 1965

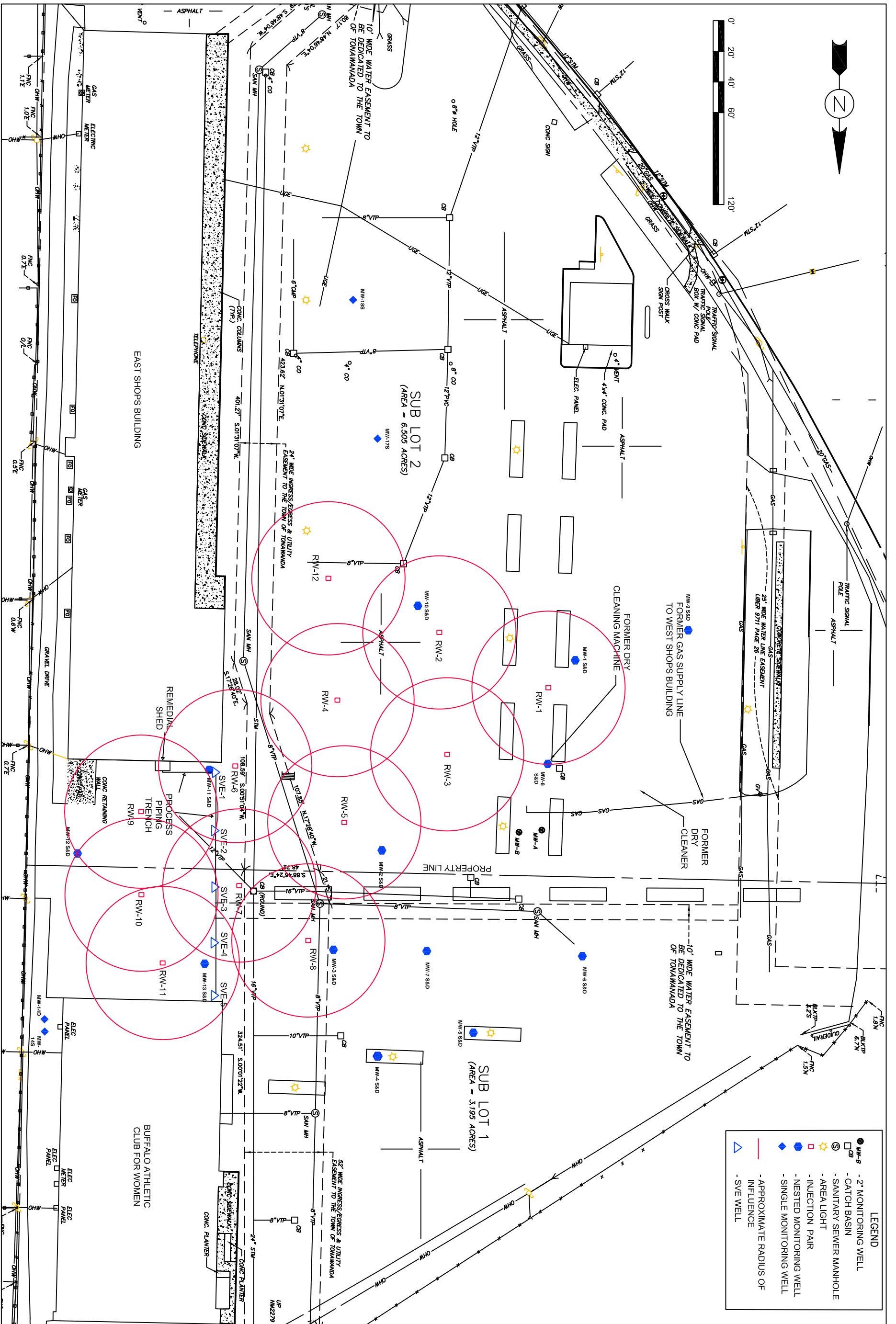
	<p align="center">SITE LOCATION MAP SRK Colvin Eggert Plaza Assoc. Former "Our Cleaners" Site Tonawanda, Erie County, NY</p>	<p>Project No. B1585 Date: December 2011 Figure No.: 1</p>
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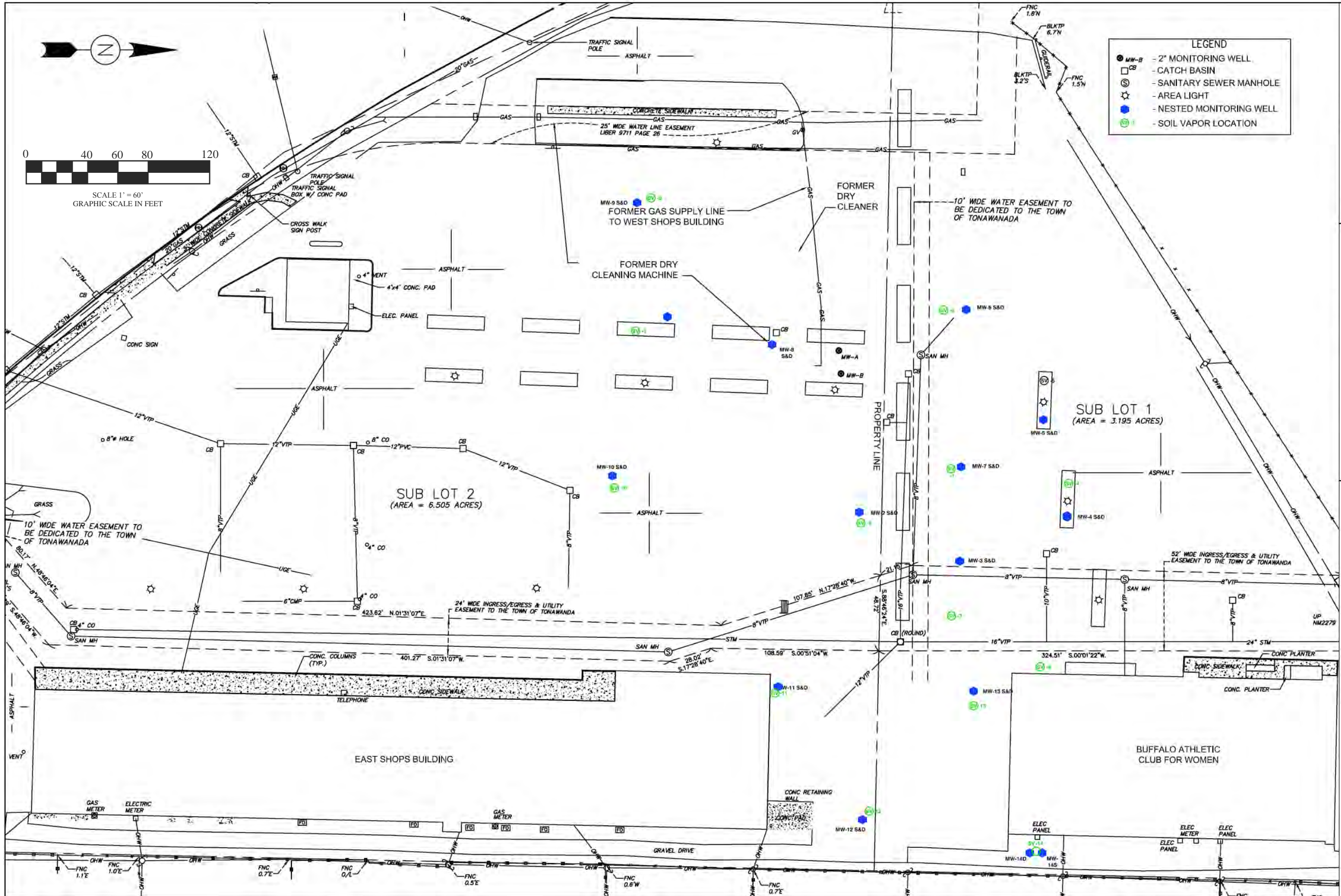
EPS of Vermont, Inc.	Date: December 2011	Project No.: B1585
Covin Eggert Plaza SITE MAP DECEMBER 2011	Scale: 1" = 60'	Figure No.: 2
	Drawn By: Geoscience	Location: Tonawanda, NY



EPS of Vermont, Inc.	Date: July 2010	Project No.: B1585
Covin Eggert Plaza	Scale: 1" = 60'	Figure No.: 3
HISTORICAL SOIL BORING / MONITORING WELL LOCATION MAP	Drawn By: Geoscience	Location: Tonawanda, NY



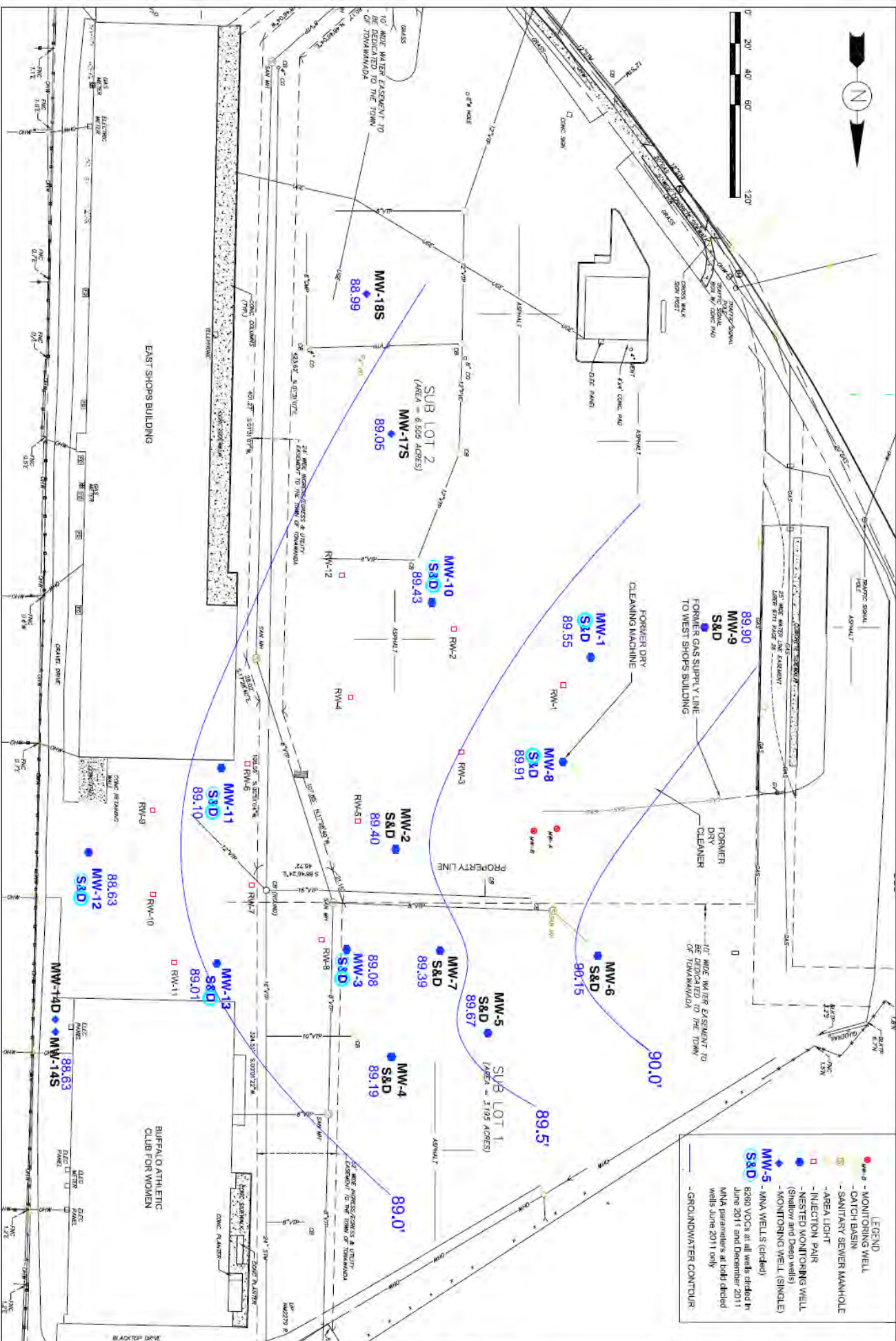
EPS of Vermont, Inc.	Date: July 2010	Project No.: B1585
Covin Eggert Plaza	Scale: 1" = 60'	Figure No.:4
MONITORING WELL / REMEDIATION WELL / SVE WELL LOCATIONS & RADIUS OF INFLUENCE	Drawn By: Geoscience	Location: Tonawanda, NY



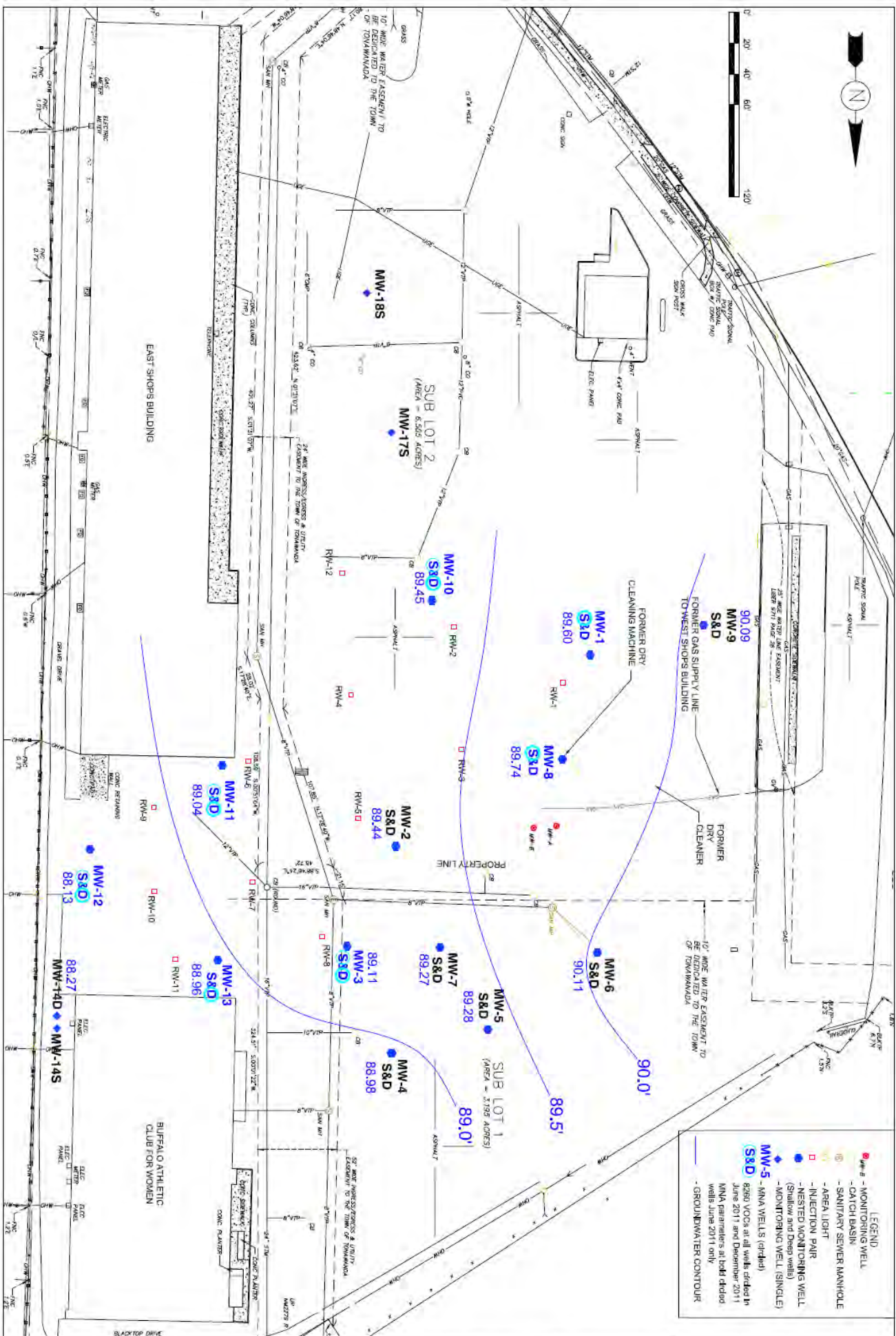
Project No.: B1585
Figure No.: 5
Location: Tonawanda, NY

Date: July 2009
Scale: 1" = 60'
Drawn By: Geoscience

EPS of Vermont, Inc.
CovIn Eggert Plaza
MONITORING WELL / SOIL VAPOR POINT LOCATIONS



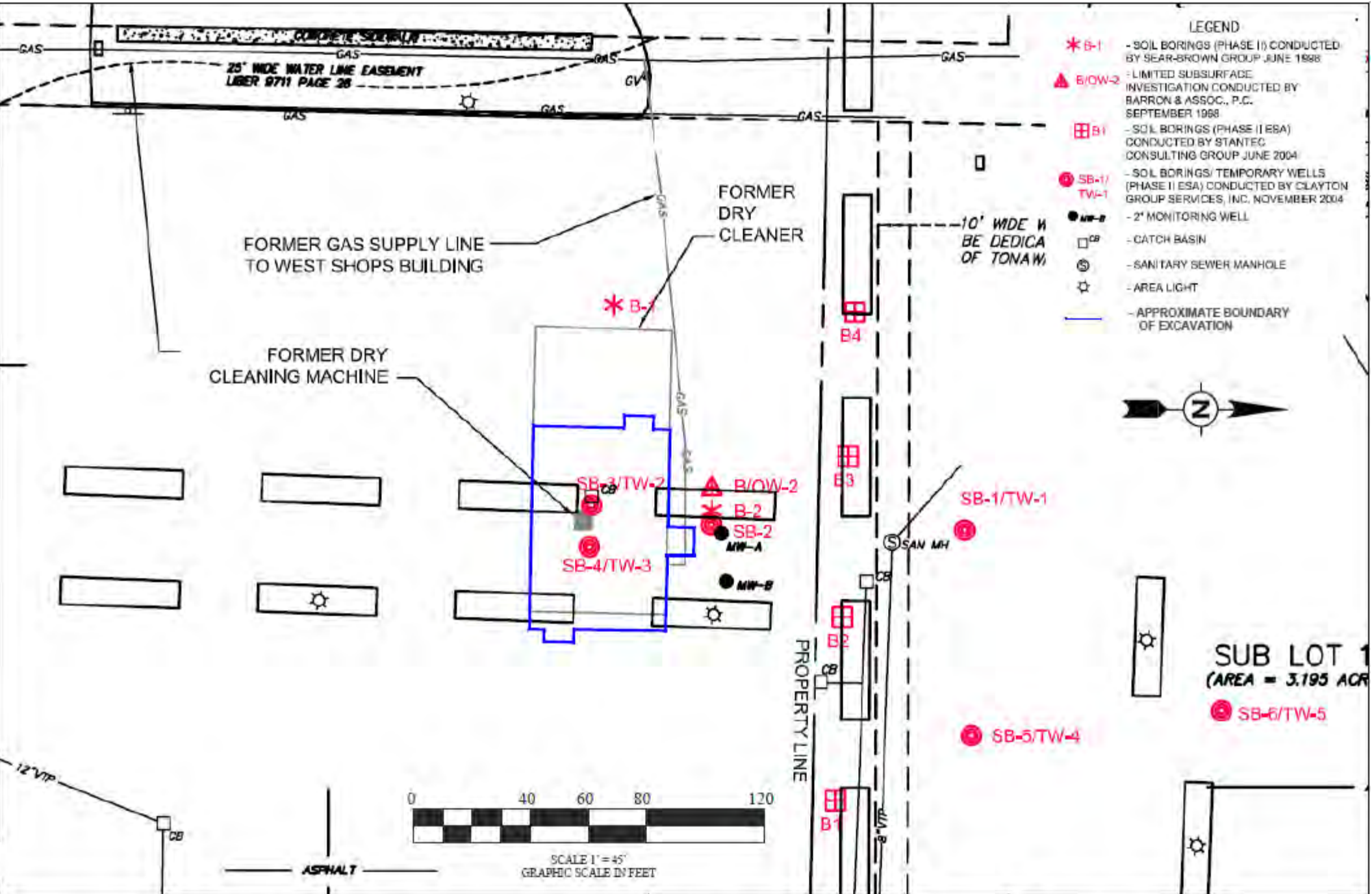
<p>EPS of Vermont, Inc.</p>	<p>Date: December 2011</p>	<p>Project No.: B1585</p>
<p>Covln Eggert Plaza SHALLOW GROUNDWATER ELEVATION MAP DECEMBER 2011</p>	<p>Scale: 1" = 60'</p>	<p>Figure No.: 6</p>
	<p>Drawn By: Geoscience</p>	<p>Location: Tonawanda, NY</p>



EPS of Vermont, Inc.
 Covln Eggert Plaza
DEEP GROUNDWATER ELEVATION MAP
 DECEMBER 2011

Date: December 2011
 Scale: 1" = 60'
 Drawn By: Geoscience

Project No.: B1585
 Figure No. 7
 Location: Tonawanda, NY



EPS of Vermont, Inc.

Date: July 2009

Project No.: B1585

Colvin Eggert Plaza

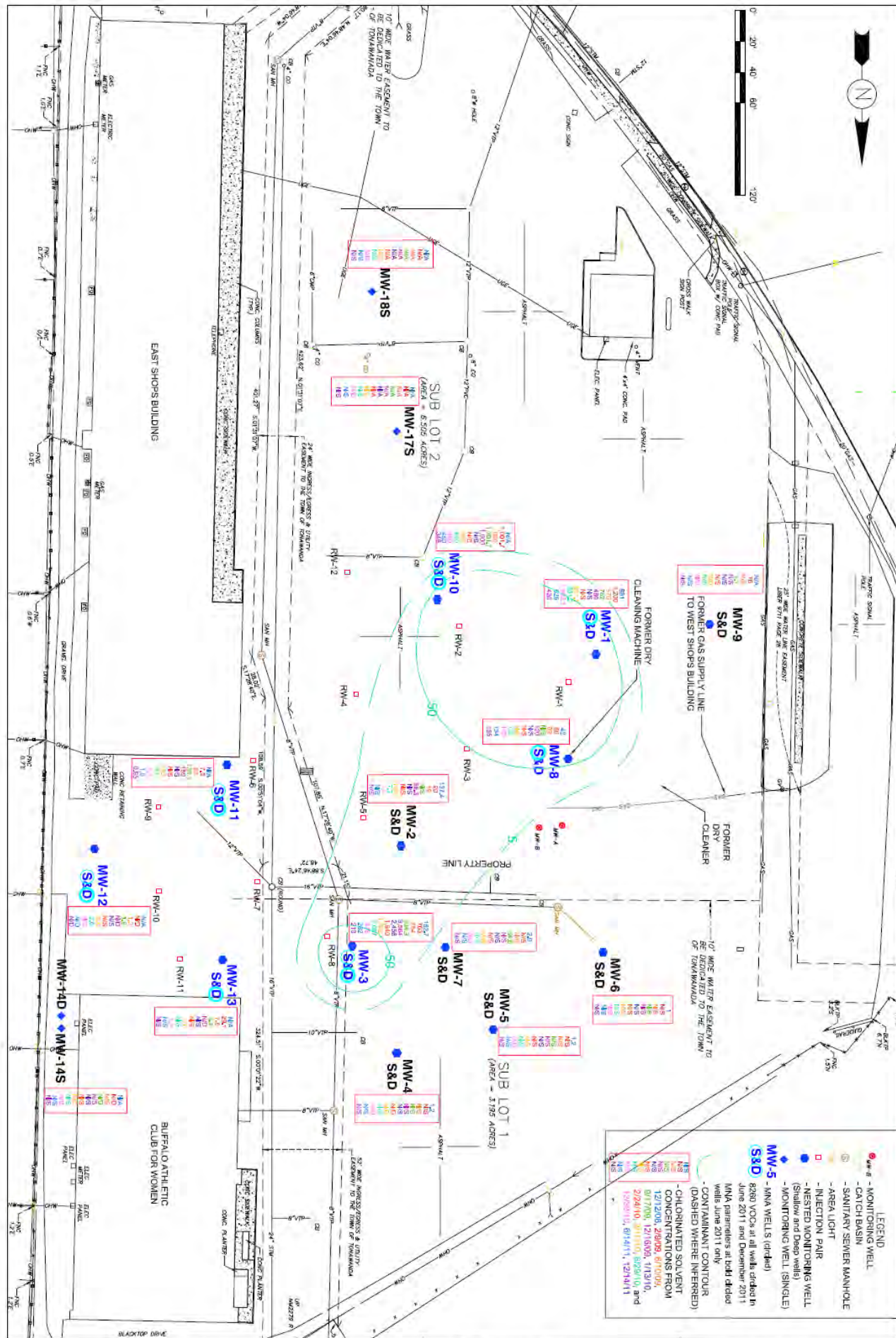
Scale: 1" = 45'

Figure No.: 8

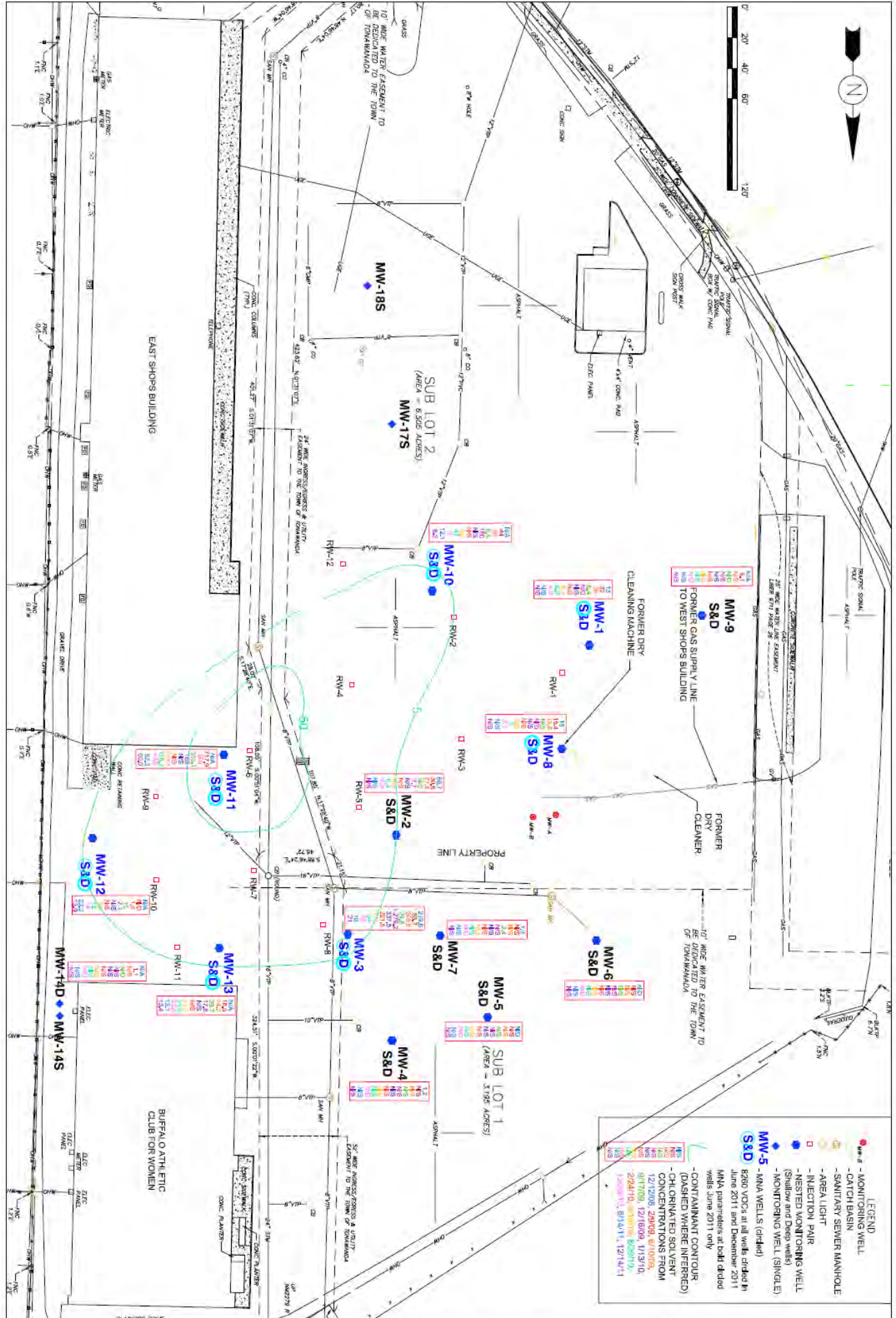
Excavation Limits

Drawn By: Geoscience

Location: Tonawanda, NY



<p>EPS of Vermont, Inc.</p>	<p>Date: December 2011</p>	<p>Project No.: B1585</p>
<p>CovIn Eggert Plaza SHALLOW GROUNDWATER CHLORINATED SOLVENTS CONCENTRATION MAP DECEMBER 2011</p>	<p>Scale: 1" = 60'</p>	<p>Figure No. 9</p>
	<p>Drawn By: Geoscience</p>	<p>Location: Tonawanda, NY</p>



<p>EPS of Vermont, Inc.</p> <p>Covin Eggert Plaza DEEP GROUNDWATER CHLORINATED SOLVENTS CONCENTRATION MAP DECEMBER 2011</p>	<p>Date: December 2011</p> <p>Scale: 1" = 60'</p> <p>Drawn By: Geoscience</p>	<p>Project No.: B1585</p> <p>Figure No 10</p> <p>Location: Tonawanda, NY</p>
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TABLES

Table 1

Former Our Cleaner's Site
 3163 Eggert Road
 Tonawanda, New York
 Order on Consent Index #B9-0740-07-03

Historical Groundwater Elevation Summary

Well ID	Casing Elevation	Depth to Water 12/12/08	Groundwater Elevation 12/12/08	Depth to Water 12/18/08	Groundwater Elevation 12/18/08	Depth to Water 2/9/09	Groundwater Elevation 2/9/09	Depth to Water 2/25/09	Groundwater Elevation 2/25/09	Depth to Water 6/10/09	Groundwater Elevation 6/10/09	Depth to Water 9/17/09	Groundwater Elevation 9/17/09
MW-1S	98.50	10.80	87.70	10.68	87.82	9.03	89.47	10.50	88.00	10.46	88.04	10.95	87.55
MW-1D	98.50	10.95	87.55	10.65	87.85	10.30	88.20	10.45	88.05	10.40	88.10	10.91	87.59
MW-2S	96.79	9.37	87.42	9.12	87.67	8.81	87.98	8.21	88.58	9.12	87.67	9.65	87.14
MW-2D	96.79	9.25	87.54	9.10	87.69	8.91	87.88	8.22	88.57	9.15	87.64	9.70	87.09
MW-3S	96.40	9.40	87.22	9.11	87.51	8.13	88.49	8.61	88.01	9.22	87.40	9.55	87.07
MW-3D	96.40	9.18	87.44	9.08	87.54	9.00	87.62	8.55	88.07	9.19	87.43	9.59	87.03
MW-4S	96.38	8.81	87.57	8.85	87.53	NG	NA	8.36	88.02	9.05	87.33	9.61	86.77
MW-4D	96.38	8.95	87.43	9.11	87.27	NG	NA	8.87	87.51	9.74	86.64	10.26	86.12
MW-5S	96.75	8.61	88.14	8.72	88.03	NG	NA	8.18	88.57	9.51	87.24	10.11	86.64
MW-5D	96.75	8.95	87.80	9.12	87.63	NG	NA	8.81	87.94	9.55	87.20	10.15	86.60
MW-6S	97.60	9.20	88.40	9.02	88.58	NG	NA	8.33	89.27	9.11	88.49	9.65	87.95
MW-6D	97.60	8.81	88.79	9.11	88.49	NG	NA	8.02	89.58	9.71	87.89	10.25	87.35
MW-7S	96.86	9.38	87.48	9.00	87.86	NG	NA	8.13	88.73	9.12	87.74	9.74	87.12
MW-7D	96.86	8.45	88.41	9.18	87.68	NG	NA	8.2	88.66	9.30	87.56	9.92	86.94
MW-8S	97.60	9.19	88.41	9.29	88.31	8.69	88.91	8.17	89.43	9.35	88.25	9.91	87.69
MW-8D	97.60	9.72	87.88	9.52	88.08	9.13	88.47	8.42	89.18	9.46	88.14	10.01	87.59
MW-9S	99.26	NA	NA	NA	NA	10.63	88.63	10.02	89.24	10.98	88.28	11.48	87.78
MW-9D	99.26	NA	NA	NA	NA	10.72	88.54	10.12	89.14	11.02	88.24	12.16	87.10
MW-10S	98.06	NA	NA	NA	NA	10.32	87.89	9.51	88.70	10.35	87.86	10.88	87.33
MW-10D	98.06	NA	NA	NA	NA	7.33	90.88	9.40	88.81	10.35	87.86	10.90	87.31
MW-11S	98.21	NA	NA	NA	NA	8.87	89.34	10.25	87.96	11.01	87.20	11.49	86.72
MW-11D	98.21	NA	NA	NA	NA	10.74	87.47	10.30	87.91	11.02	87.19	11.52	86.69
MW-12S	95.08	NA	NA	NA	NA	1.83*	93.25	7.26	87.82	8.28	86.80	9.20	85.88
MW-12D	95.08	NA	NA	NA	NA	6.66*	88.42	7.95	87.13	8.88	86.20	8.81	86.27
MW-13S	96.88	NA	NA	NA	NA	9.48	87.40	9.06	87.82	9.70	87.18	10.11	86.77
MW-13D	96.88	NA	NA	NA	NA	9.64	87.24	9.15	87.73	9.95	86.93	10.22	86.66
MW-14S	94.48	NA	NA	NA	NA	7.98	86.50	6.96	87.52	7.84	86.64	8.17	86.31
MW-14D	94.58	NA	NA	NA	NA	7.15	87.43	7.91	86.67	8.85	85.73	8.98	85.60
MW-17S	98.73	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MW-18S	99.01	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
MW-A	97.62	NG	NA	9.40	88.22	NG	NA	8.35	89.27	NG	NA	NG	NA
MW-B	97.45	NG	NA	9.37	88.08	NG	NA	7.75	89.70	NG	NA	NG	NA

Note: All values are reported in feet.

* MW-12 gauged and sampled on 2/12/09, not 2/9/09.

NA = Not Available.

NG = Not Gauged.

Table 1

Former Our Cleaner's Site
 3163 Eggert Road
 Tonawanda, New York
 Order on Consent Index #B9-0740-07-03

Historical Groundwater Elevation Summary

Well ID	Casing Elevation	Depth to Water 12/21/09	Groundwater Elevation 12/21/09	Depth to Water 3/10/10	Groundwater Elevation 3/10/10	Depth to Water 6/29/10	Groundwater Elevation 6/29/10	Depth to Water 12/29/10	Groundwater Elevation 12/29/10	Depth to Water 6/14/11	Groundwater Elevation 6/14/11	Depth to Water 12/14/11	Groundwater Elevation 12/14/11
MW-1S	98.50	10.26	88.24	8.35	90.15	8.91	89.59	9.27	89.23	8.02	90.48	8.95	89.55
MW-1D	98.50	10.26	88.24	8.34	90.16	8.87	89.63	9.23	89.27	8.14	90.36	8.90	89.60
MW-2S	96.79	8.89	87.90	6.73	90.06	7.40	89.39	7.48	89.31	6.67	90.12	7.39	89.40
MW-2D	96.79	8.84	87.95	6.64	90.15	7.34	89.45	7.62	89.17	6.75	90.04	7.35	89.44
MW-3S	96.40	8.83	87.57	6.79	89.61	7.32	89.08	7.35	89.05	6.85	89.55	7.32	89.08
MW-3D	96.40	8.83	87.57	6.74	89.66	7.29	89.11	7.35	89.05	6.85	89.55	7.29	89.11
MW-4S	96.38	8.59	87.79	6.59	89.79	7.27	89.11	7.33	89.05	6.82	89.56	7.19	89.19
MW-4D	96.38	8.67	87.71	6.97	89.41	7.67	88.71	7.94	88.44	7.44	88.94	7.40	88.98
MW-5S	96.75	8.55	88.20	6.13	90.62	7.20	89.55	7.50	89.25	6.79	89.96	7.08	89.67
MW-5D	96.75	8.99	87.76	6.80	89.95	7.61	89.14	7.94	88.81	7.44	89.31	7.47	89.28
MW-6S	97.49	8.88	88.72	6.13	91.47	7.43	90.06	7.88	89.61	7.00	90.49	7.34	90.15
MW-6D	97.49	8.88	88.72	6.46	91.14	7.61	89.88	7.96	89.53	7.10	90.39	7.38	90.11
MW-7S	96.86	8.86	88.00	6.70	90.16	7.49	89.37	7.62	89.24	6.84	90.02	7.47	89.39
MW-7D	96.86	9.07	87.79	6.93	89.93	7.71	89.15	7.89	88.97	7.31	89.55	7.59	89.27
MW-8S	97.60	9.10	88.50	6.93	90.67	7.74	89.86	8.18	89.42	10.53	87.07	7.69	89.91
MW-8D	97.60	9.24	88.36	7.08	90.52	7.87	89.73	8.24	89.36	7.00	90.60	7.86	89.74
MW-9S	99.26	10.78	88.48	8.93	90.33	9.45	89.81	9.77	89.49	8.51	90.75	9.36	89.90
MW-9D	99.26	10.70	88.56	8.92	90.34	9.37	89.89	9.53	89.73	8.39	90.87	9.17	90.09
MW-10S	98.06	10.19	87.87	8.15	89.91	8.63	89.43	8.96	89.10	7.76	90.30	8.63	89.43
MW-10D	98.06	10.20	87.86	8.16	89.90	8.64	89.42	8.98	89.08	7.76	90.30	8.61	89.45
MW-11S	98.21	10.66	87.55	8.54	89.67	8.98	89.23	9.57	88.64	8.64	89.57	9.11	89.10
MW-11D	98.21	10.70	87.51	8.56	89.65	9.07	89.14	9.57	88.64	8.68	89.53	9.17	89.04
MW-12S	95.08	7.81	87.27	5.75	89.33	6.58	88.50	6.70	88.38	6.05	89.03	6.45	88.63
MW-12D	95.08	8.39	86.69	6.38	88.70	6.92	88.16	7.27	87.81	6.69	88.39	6.95	88.13
MW-13S	96.88	9.35	87.53	7.42	89.46	7.83	89.05	8.15	88.73	7.47	89.41	7.87	89.01
MW-13D	96.88	9.40	87.48	7.47	89.41	7.93	88.95	8.21	88.67	7.57	89.31	7.92	88.96
MW-14S	94.48	7.14	87.34	5.35	89.13	5.93	88.55	6.23	88.25	5.52	88.96	5.85	88.63
MW-14D	94.58	7.98	86.60	6.15	88.43	6.59	87.99	6.85	87.73	6.51	88.07	6.31	88.27
MW-17S	98.73	NA	NA	9.32	89.41	9.58	89.15	9.53	89.20	9.06	89.67	9.68	89.05
MW-18S	99.01	NA	NA	9.77	89.24	10.02	88.99	10.27	88.74	9.18	89.83	10.02	88.99
MW-A	97.62	NG	NA	NG	NA	NG	NA	NG	NA	NG	NA	NG	NA
MW-B	97.45	NG	NA	NG	NA	NG	NA	NG	NA	NG	NA	NG	NA

Note: All values are reported in feet.

* MW-12 gauged and sampled on 2/12/09, not 2/9/09.

NA = Not Available.

NG = Not Gauged.

Table 3: Contaminant Mass Calculations

Date	Total Mass	Percent Reduction	93.64%
2/9/2009	6.080		
12/14/2011	0.387		

Shallow Groundwater 02-09-09

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
1,259	3	0.4	1	1.511	3.324
1,002	3	0.4	0.5	0.601	1.323
1,914	3	0.4	0.05	0.115	0.253
3,431	3	0.4	0.005	0.021	0.045

Total: 4.944

Deep Groundwater 02-09-09

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
588	3	0.4	0.5	0.353	0.776
2,331	3	0.4	0.05	0.140	0.308
3,936	3	0.4	0.005	0.024	0.052

Total: 1.136

Shallow Groundwater 06-10-09

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
1,249	3	0.4	0.5	0.749	1.649
3,044	3	0.4	0.05	0.183	0.402
3,186	3	0.4	0.005	0.019	0.042

Total: 2.093

Deep Groundwater 06-10-09

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
3,558	3	0.4	0.05	0.213	0.470
4,131	3	0.4	0.005	0.025	0.055

Total: 0.524

Note: Chlorinated Solvent Mass (kg) is calculated by multiplying Area of Impact*Est. Thickness of Impact*Porosity*1,000* Chlorinated Solvent Conc.*10⁻⁶ (then it is multiplied by 2.2 to convert to lbs).

Table 3: Contaminant Mass Calculations

Shallow Groundwater 09-17-09

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
669	3	0.4	1	0.803	1.766
2,054	3	0.4	0.5	1.232	2.711
3,248	3	0.4	0.05	0.195	0.429
2,077	3	0.4	0.005	0.012	0.027

Total: 4.934

Deep Groundwater 09-17-09

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
2,632	3	0.4	0.05	0.158	0.347
4,756	3	0.4	0.005	0.029	0.063

Total: 0.410

Shallow Groundwater 12-16-09 & 01-13-10

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
395	3	0.4	1	0.473	1.042
1,324	3	0.4	0.5	0.794	1.747
3,396	3	0.4	0.05	0.204	0.448
1,442	3	0.4	0.005	0.009	0.019

Total: 3.256

Deep Groundwater 12-16-09 & 01-13-10

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
3,827	3	0.4	0.05	0.230	0.505
1,246	3	0.4	0.005	0.007	0.016

Total: 0.522

Note: Chlorinated Solvent Mass (kg) is calculated by multiplying Area of Impact*Est. Thickness of Impact*Porosity*1,000* Chlorinated Solvent Conc.*10⁻⁶ (then it is multiplied by 2.2 to convert to lbs).

Table 3: Contaminant Mass Calculations

Shallow Groundwater 03-10-10

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
258	3	0.4	1	0.310	0.681
977	3	0.4	0.5	0.586	1.290
4,008	3	0.4	0.05	0.240	0.529
2,076	3	0.4	0.005	0.012	0.027

Total: 2.528

Deep Groundwater 03-10-10

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
2,972	3	0.4	0.05	0.178	0.392
3,175	3	0.4	0.005	0.019	0.042

Total: 0.434

Shallow Groundwater 6-29-10

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
205	3	0.4	1	0.246	0.540
986	3	0.4	0.5	0.592	1.302
2,576	3	0.4	0.05	0.155	0.340
6,108	3	0.4	0.005	0.037	0.081

Total: 2.263

Deep Groundwater 6-29-10

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
3,599	3	0.4	0.05	0.216	0.475
6,278	3	0.4	0.005	0.038	0.083

Total: 0.558

Note: Chlorinated Solvent Mass (kg) is calculated by multiplying Area of Impact*Est. Thickness of Impact*Porosity*1,000* Chlorinated Solvent Conc.*10⁻⁶ (then it is multiplied by 2.2 to convert to lbs).

Table 3: Contaminant Mass Calculations

Shallow Groundwater 12-29-10

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
455	3	0.4	1	0.546	1.201
1,126	3	0.4	0.5	0.676	1.486
2,730	3	0.4	0.05	0.164	0.360
5,876	3	0.4	0.005	0.035	0.078

Total: 3.125

Deep Groundwater 12-29-10

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
1,635	3	0.4	0.025	0.049	0.108
6,433	3	0.4	0.005	0.039	0.085

Total: 0.193

Shallow Groundwater 6-14-2011

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
133	3	0.4	0.5	0.080	0.176
1,528	3	0.4	0.05	0.092	0.202
3,949	3	0.4	0.005	0.024	0.052

Total: 0.429

Deep Groundwater 6-14-2011

Area of Impact (m ²)	Estimated Thickness of Impact (m)	Porosity (m ³ /m ³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
1,235	3	0.4	0.05	0.074	0.163
4,631	3	0.4	0.005	0.028	0.061

Total: 0.224

Note: Chlorinated Solvent Mass (kg) is calculated by multiplying Area of Impact*Est. Thickness of Impact*Porosity*1,000* Chlorinated Solvent Conc.*10⁻⁶ (then it is multiplied by 2.2 to convert to lbs).

Table 3: Contaminant Mass Calculations

Shallow Groundwater 12-14-2011

Area of Impact (m²)	Estimated Thickness of Impact (m)	Porosity (m³/m³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
1,493	3	0.4	0.05	0.090	0.197
3,708	3	0.4	0.005	0.022	0.049

Total: 0.246

Deep Groundwater 12-14-2011

Area of Impact (m²)	Estimated Thickness of Impact (m)	Porosity (m³/m³)	Chlorinated Solvent Concentration (mg/L)	Chlorinated Solvent Mass (kg)	Chlorinated Solvent Mass (lbs)
647	3	0.4	0.05	0.039	0.085
4,200	3	0.4	0.005	0.025	0.055

Total: 0.141

Note: Chlorinated Solvent Mass (kg) is calculated by multiplying Area of Impact*Est. Thickness of Impact*Porosity*1,000* Chlorinated Solvent Conc.*10⁻⁶ (then it is multiplied by 2.2 to convert to lbs).

APPENDICES

APPENDIX A:
FILED DEED RESTRICTIONS & SITE MAP

CORRECTED DECLARATION of COVENANTS and RESTRICTIONS

FILED
DEC - 2 2013
ERIE COUNTY
CLERK'S OFFICE

THIS CORRECTED DECLARATION of COVENANTS and RESTRICTIONS (“CORRECTED DECLARATION”) is made as of the 19th day of November 2013, by SRK Colvin Eggert Plaza Associates LP, a partnership organized and existing under the laws of the State of New York and having an office for the transaction of business at 4053 Maple Road, Amherst, NY 14226-1072.

WHEREAS, Colvin Eggert Plaza – Our Cleaners (Site #915212) is the subject of an Order on Consent executed by SRK Colvin Eggert Plaza Associates LP as part of the New York State Department of Environmental Conservation’s (the “Department”) State Superfund Program, namely that parcel of real property located at the address of 3163 Eggert Road in the Town of Tonawanda, County of Erie, State of New York, being part of that property conveyed to SRK Colvin Eggert Plaza Associates LP by Cabot Group Real Estate LP 11984-1 by deed(s) dated March 6, 1998 and recorded on March 6, 1998 in the Erie County Clerk's Office in Liber and Page 10928 and 5537, designated on the Tax Map of the Erie County Clerk as Tax Map Parcel No. 53.11-2-31.1 and being more particularly described in Schedule “A,” attached to this declaration and made a part hereof and hereinafter referred to as “the Property”; and

WHEREAS, the Department approved a remedy to eliminate or mitigate all significant threats to the environment presented by the contamination disposed at the Property and such remedy requires that the Property be subject to restrictive covenants; and

WHEREAS, this Corrected Declaration supersedes and replaces the Declaration of Covenants and Restrictions dated August 22, 2013 and filed in the Erie County Clerk's Office in Liber 11251 and Page 8894.

NOW, THEREFORE, SRK Colvin Eggert Plaza Associates LP, for itself and its successors and/or assigns, covenants that:

First, the Property subject to this Corrected Declaration is as shown on a map attached to this declaration as Schedule "B" and made a part hereof.

Second, unless prior written approval by the Department or, if the Department shall no longer exist, any New York State agency or agencies subsequently created to protect the environment of the State and the health of the State’s citizens, hereinafter referred to as “the Relevant Agency,” is first obtained, where contamination remains at the Property subject to the provisions of the Site Management Plan (“SMP”), there shall be no construction, use or occupancy of the Property that results in the disturbance or excavation of the Property which threatens the integrity of the engineering controls or which results in unacceptable human

exposure to contaminated soils. The SMP may be obtained from the New York State Department of Environmental Conservation, Division of Environmental Remediation, Site Control Section, 625 Broadway, Albany, NY 12233.

Third, the owner of the Property shall not disturb, remove, or otherwise interfere with the installation, use, operation, and maintenance of engineering controls required for the Remedy, which are described in the SMP, unless in each instance the owner first obtains a written waiver of such prohibition from the Department or Relevant Agency.

Fourth, the owner of the Property shall prohibit the Property from ever being used for purposes other than for Commercial use as described in 6 NYCRR Part 375-1.8(g)(2)(iii) and Industrial use as described in 6 NYCRR Part 375-1.8(g)(2)(iv) without the express written waiver of such prohibition by the Department or Relevant Agency.

Fifth, the use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or the Erie County Department of Health to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department.

Sixth, the owner of the Property shall provide a periodic certification, prepared and submitted by a professional engineer or environmental professional acceptable to the Department or Relevant Agency, which will certify that the institutional and engineering controls put in place are unchanged from the previous certification, comply with the SMP, and have not been impaired.

Seventh, the owner of the Property shall continue in full force and effect any institutional and engineering controls required for the Remedy and maintain such controls, unless the owner first obtains permission to discontinue such controls from the Department or Relevant Agency, in compliance with the approved SMP, which is incorporated and made enforceable hereto, subject to modifications as approved by the Department or Relevant Agency.

Eighth, this Corrected Declaration is and shall be deemed a covenant that shall run with the land and shall be binding upon all future owners of the Property, and shall provide that the owner and its successors and assigns consent to enforcement by the Department or Relevant Agency of the prohibitions and restrictions that the Order on Consent requires to be recorded, and hereby covenant not to contest the authority of the Department or Relevant Agency to seek enforcement.

Ninth, any deed of conveyance of the Property, or any portion thereof, shall recite, unless the Department or Relevant Agency has consented to the termination of such covenants and restrictions, that said conveyance is subject to this Corrected Declaration.

Tenth, this Corrected Declaration supersedes and replaces the Declaration of Covenants and Restrictions dated August 23, 2013 and filed in the Erie County Clerk's Office in Liber 11251 and Page 8894.

IN WITNESS WHEREOF, the undersigned has executed this Corrected Declaration the day written below.

By: Steven J. Longo

STEVEN J. LONGO
Vice President

Steven J. Longo
Vice President

Print Name: _____

Title: VP Date: 11/19/13

Grantor's Acknowledgment

STATE OF NEW YORK)

) s.s.:

COUNTY OF ERIE)

On the 19th day of November, in the year 2013, before me, the undersigned, personally appeared Steven J Longo, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.

Abraham M. Slisz

Notary Public State of New York

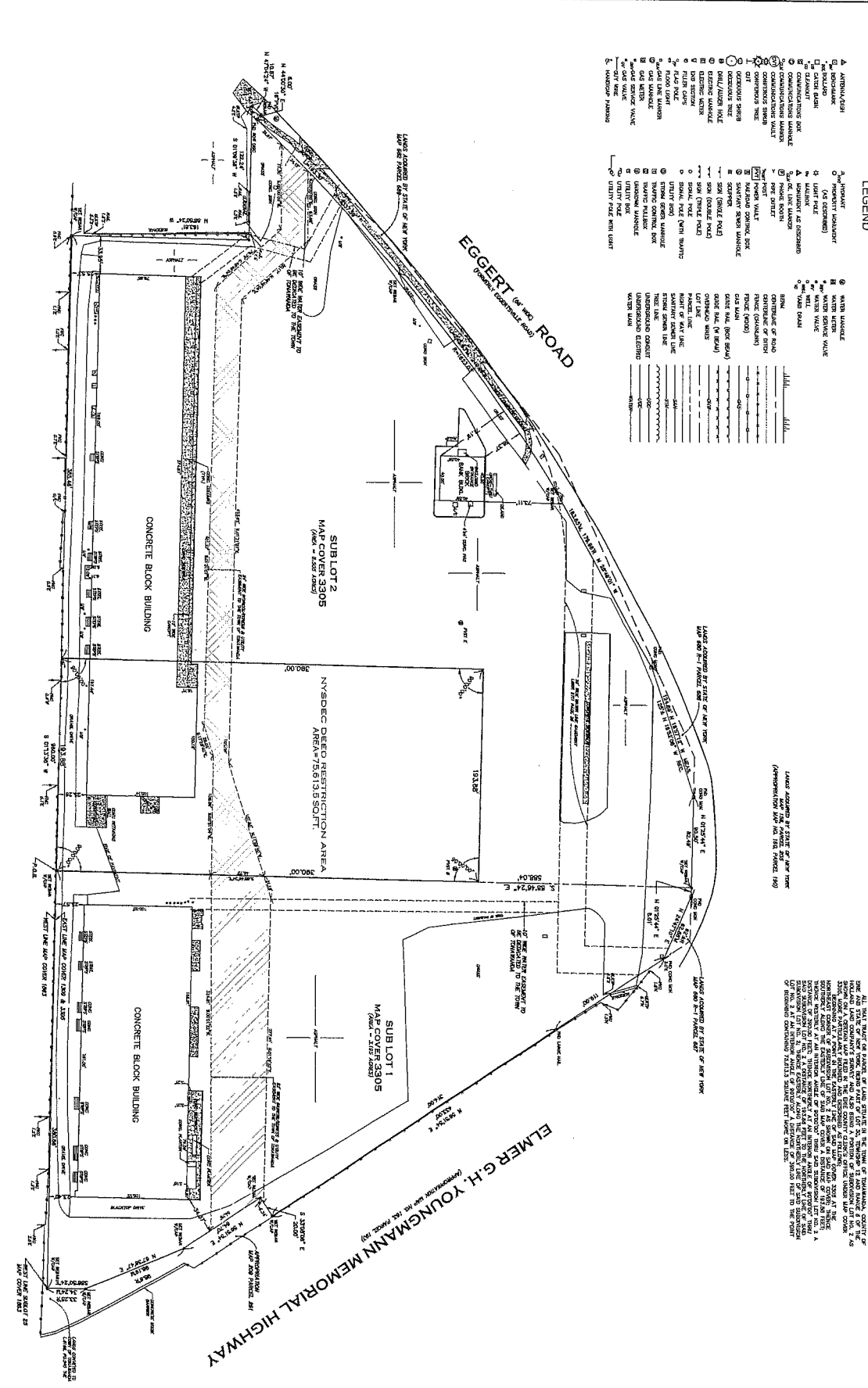
ABRAHAM M. SLISZ
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ERIE COUNTY
My Commission Expires July 7, 2015

SCHEDULE "A"

ALL THAT TRACT OR PARCEL OF LAND SITUATE IN THE TOWN OF TONAWANDA, COUNTY OF ERIE AND STATE OF NEW YORK, BEING PART OF LOT 30, TOWNSHIP 12 AND RANGE 8 OF THE HOLLAND LAND COMPANY'S SURVEY AND ALSO BEING A PORTION OF SUBDIVISION LOT NO. 2 AS SHOWN ON A CERTAIN MAP FILED IN THE ERIE COUNTY CLERK'S OFFICE UNDER MAP COVER 3305, MORE PARTICULARLY BOUNDED AND DESCRIBED AS FOLLOWS: BEGINNING AT A POINT IN THE EASTERLY LINE OF SAID MAP COVER 3305 AT THE NORTHEAST CORNER OF SUBDIVISION LOT NO. 2 AS SHOWN ON SAID MAP COVER; THENCE SOUTHERLY ALONG THE EASTERLY LINE OF SAID MAP COVER A DISTANCE OF 193.88 FEET; THENCE WESTERLY AT AN INTERIOR ANGLE OF 90°00'00" THRU SAID SUBDIVISION LOT NO. 2 A DISTANCE OF 390.00 FEET; THENCE NORTHERLY AT AN INTERIOR ANGLE OF 90°00'00" THRU SAID SUBDIVISION LOT NO. 2 A DISTANCE OF 193.88 FEET TO THE NORTHERLY LINE OF SAID SUBDIVISION LOT NO. 2; THENCE EASTERLY ALONG THE NORTHERLY LINE OF SAID SUBDIVISION LOT NO. 2 AT AN INTERIOR ANGLE OF 90°00'00" A DISTANCE OF 390.00 FEET TO THE POINT OF BEGINNING CONTAINING 75,613.5 SQUARE FEET MORE OR LESS.

SCHEDULE “B”

(see attached)



- ### LEGEND
- 1. ASPHALT
 - 2. CONCRETE
 - 3. GRAVEL
 - 4. SAND
 - 5. BRICK
 - 6. SLATE
 - 7. GYP. BOARD
 - 8. INSULATION
 - 9. PLASTER
 - 10. LATH
 - 11. CEILING
 - 12. WALL
 - 13. FLOOR
 - 14. ROOF
 - 15. DRIVE
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NYSDEC DEED RESTRICTION DESCRIPTION

THIS INSTRUMENT IS SUBJECT TO THE RESTRICTIONS AND COVENANTS SET FORTH IN THE NYSDEC DEED RESTRICTION MAP FOR MAP COVER 3305, FILED IN THE COUNTY OF TOWN OF TONAWANDA, COUNTY OF ERIE, STATE OF NEW YORK, ON APRIL 1, 2013. THE RESTRICTIONS AND COVENANTS SET FORTH IN SAID MAP COVER 3305 ARE HEREBY INCORPORATED BY REFERENCE INTO THIS INSTRUMENT AND SHALL BE CONSIDERED A PART OF THIS INSTRUMENT. THE RESTRICTIONS AND COVENANTS SET FORTH IN SAID MAP COVER 3305 SHALL BE APPLICABLE TO ALL PARTS OF THE LAND DESCRIBED IN THIS INSTRUMENT, AND THE RESTRICTIONS AND COVENANTS SET FORTH IN SAID MAP COVER 3305 SHALL BE APPLICABLE TO ALL PARTS OF THE LAND DESCRIBED IN THIS INSTRUMENT, AND THE RESTRICTIONS AND COVENANTS SET FORTH IN SAID MAP COVER 3305 SHALL BE APPLICABLE TO ALL PARTS OF THE LAND DESCRIBED IN THIS INSTRUMENT.

TOWN OF TONAWANDA
 COUNTY OF ERIE, STATE OF NEW YORK
 PART OF LOT 30, TOWNSHIP 12, RANGE 8
 HOLLAND LAND COMPANY'S SURVEY

COLVIN-EGGERT PLAZA
NYSDEC DEED RESTRICTION MAP

DRAWING CODE: E-1-1-C
 SHEET 1 OF 1

WM SCHUTT ASSOCIATES
 97 CENTRAL AVE
 LANCASTER, NY 14066-2143
 PH. 716-683-5961
 FAX 716-683-0169
 WWW.WMSCHUTT.COM

DESIGNED BY:	
DRAWN BY:	GCW
CHECKED BY:	GCW
DATE:	APRIL, 2013

WARNING:
 ALL TYPING THIS DOCUMENT IS IN VIOLATION OF THE LAW EXCEPTING AS PROVIDED IN SECTION 1703, PART 2 OF THE NEW YORK STATE EXECUTOR LAW. © COPYRIGHT 2013 WMS, SCHUTT & ASSOCIATES P.C.

DRAWING REVISIONS			
NO.	DATE	BY	DESCRIPTION
1	04/01/2013	GCW	REVISION
2	07/09/2013	REVERE	REVISION

CHRISTOPHER L. JACOBS, ERIE COUNTY CLERK
REF:

DATE:12/2/2013
TIME:3:26:08 PM
RECEIPT: 13191773

LIPPES MATHIAS ETAL
ACCOUNT #: 1627

ITEM - 01 774
RECD: 12/2/2013 3:28:59 PM
FILE: 2013274401 BK/PD D 11257/563
SRK COLVIN EGGERT PLAZA ASSOCIATES LP
Recording Fees 81.00
Sub. Total 81.00

TOTAL DUE	\$81.00
PAID TOTAL	\$81.00
PAID CHECK	\$81.00
Check #65729:	81.00

REC BY: Christina
COUNTY RECORDER

APPENDIX B:
EXCAVATION WORK PLAN

APPENDIX B – EXCAVATION WORK PLAN

B-1 NOTIFICATION

At least 15 days prior to the start of any activity that is anticipated to encounter remaining contamination, the site owner or their representative will notify the Department. Currently, this notification will be made to:

Mr. Greg Sutton
Regional Hazardous Waste Remediation Engineer
270 Michigan Avenue
Buffalo, NY 14203

This notification will include:

- A detailed description of the work to be performed, including the location and areal extent, plans for site re-grading, intrusive elements or utilities to be installed below the soil cover, estimated volumes of contaminated soil to be excavated and any work that may impact an engineering control,
- A summary of environmental conditions anticipated in the work areas, including the nature and concentration levels of contaminants of concern, potential presence of grossly contaminated media, and plans for any pre-construction sampling;
- A schedule for the work, detailing the start and completion of all intrusive work,
- A summary of the applicable components of this EWP,

A Simple excavation may only require compliance with a portion of the EWP.

- A statement that the work will be performed in compliance with this EWP and 29 CFR 1910.120,
- A copy of the contractor's health and safety plan, in electronic format
- Identification of disposal facilities for potential waste streams,
- Identification of sources of any anticipated backfill, along with all required chemical testing results.

B-2 SOIL SCREENING METHODS

Visual, olfactory and instrument-based (Photoionization detector) soil screening will be performed by a qualified environmental professional during all remedial and development excavations into known or potentially contaminated material (remaining contamination). Soil screening will be performed regardless of when the invasive work is done and will include all excavation and invasive work performed during development, such as excavations for foundations and utility work, after issuance of the COC.

Soils will be segregated based on previous environmental data and screening results into material that requires off-site disposal, material that requires testing, material that can be returned to the subsurface, and material that can be used as cover soil.

B-3 STOCKPILE METHODS

- Soil stockpiles will be continuously encircled with a berm and/or silt fence. Hay bales will be used as needed near catch basins, surface waters and other discharge points.
- Stockpiles will be kept covered at all times with appropriately anchored tarps. Stockpiles will be routinely inspected and damaged tarp covers will be promptly replaced.
- Stockpiles will be inspected at a minimum once each week and after every storm event. Results of inspections will be recorded in a logbook and maintained at SRK and EPSVT and available for inspection by NYSDEC.

B-4 MATERIALS EXCAVATION AND LOAD OUT

A qualified environmental professional or person under their supervision will oversee all invasive work and the excavation and load-out of all excavated material.

The owner of the property and its contractors are solely responsible for safe execution of all invasive and other work performed under this Plan.

The presence of utilities and easements on the site will be investigated by the qualified environmental professional. It will be determined whether a risk or impediment to the planned work under this SMP is posed by utilities or easements on the site.

Loaded vehicles leaving the site will be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with appropriate Federal, State, local, and NYSDOT requirements (and all other applicable transportation requirements).

A truck wash will be operated on-site, if necessary. The qualified environmental professional will be responsible for ensuring that all outbound trucks will be washed at the truck wash before leaving the site until the activities performed under this section are complete.

Locations where vehicles enter or exit the site shall be inspected daily for evidence of off-site soil tracking.

The qualified environmental professional will be responsible for ensuring that all egress points for truck and equipment transport from the site are clean of dirt and other materials derived from the site during intrusive excavation activities. Cleaning of the adjacent streets will be performed as needed to maintain a clean condition with respect to site-derived materials.

B-5 MATERIALS TRANSPORT OFF-SITE

All transport of materials will be performed by licensed haulers in accordance with appropriate local, State, and Federal regulations, including 6 NYCRR Part 364. Haulers will be appropriately licensed and trucks properly placarded.

Material transported by trucks exiting the site will be secured with tight-fitting covers. Loose-fitting canvas-type truck covers will be prohibited. If loads contain wet material capable of producing free liquid, truck liners will be used.

All trucks will be washed prior to leaving the site. Truck wash waters will be collected and disposed of off-site in an appropriate manner.

All trucks loaded with site materials will exit the vicinity of the site using only these approved truck routes. This is the most appropriate route and takes into account: (a) limiting transport through residential areas and past sensitive sites; (b) use of city mapped truck routes; (c) prohibiting off-site queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; and (f) overall safety in transport; [(g) community input, if necessary

Trucks will be prohibited from stopping and idling in the neighborhood outside the project site.

Egress points for truck and equipment transport from the site will be kept clean of dirt and other materials during site remediation and development.

Queuing of trucks will be performed on-site in order to minimize off-site disturbance. Off-site queuing will be prohibited.

B-6 MATERIALS DISPOSAL OFF-SITE

All soil/fill/solid waste excavated and removed from the site will be treated as contaminated and regulated material and will be transported and disposed in accordance with all local, State (including 6NYCRR Part 360) and Federal regulations. If disposal of soil/fill from this site is proposed for unregulated off-site disposal (i.e. clean soil removed for development purposes), a formal request with an associated plan will be made to the NYSDEC. Unregulated off-site management of materials from this site will not occur without formal NYSDEC approval.

Off-site disposal locations for excavated soils will be identified in the pre-excavation notification. This will include estimated quantities and a breakdown by class of disposal facility if appropriate, i.e. hazardous waste disposal facility, solid waste landfill, petroleum treatment facility, C/D recycling facility, etc. Actual disposal quantities and associated documentation will be reported to the NYSDEC in the Periodic Review Report. This documentation will include: waste profiles, test results, facility acceptance letters, manifests, bills of lading and facility receipts.

Non-hazardous historic fill and contaminated soils taken off-site will be handled, at minimum, as a Municipal Solid Waste per 6NYCRR Part 360-1.2. Material that does not meet Track 1 unrestricted SCOs is prohibited from being taken to a New York State recycling facility (6NYCRR Part 360-16 Registration Facility).

B-7 MATERIALS REUSE ON-SITE

Chemical criteria for on-site reuse of material have been approved by NYSDEC and are listed in NYSDEC CP-51 SCOs. The qualified environmental professional will ensure that procedures defined for materials reuse in this SMP are followed and that unacceptable material does not remain on-site. Contaminated on-site material, including historic fill and contaminated soil, that is acceptable for re-use on-site will be placed below the demarcation layer or impervious surface, and will not be reused within a cover soil layer, within landscaping berms, or as backfill for subsurface utility lines.

Any demolition material proposed for reuse on-site will be sampled for asbestos and the results will be reported to the NYSDEC for acceptance. Concrete crushing or processing on-site will not

be performed without prior NYSDEC approval. Organic matter (wood, roots, stumps, etc.) or other solid waste derived from clearing and grubbing of the site will not be reused on-site.

B-8 FLUIDS MANAGEMENT

All liquids to be removed from the site, including excavation dewatering and groundwater monitoring well purge and development waters, will be handled, transported and disposed in accordance with applicable local, State, and Federal regulations. Dewatering, purge and development fluids will not be recharged back to the land surface or subsurface of the site, but will be managed off-site.

Discharge of water generated during large-scale construction activities to surface waters (i.e. a local pond, stream or river) will be performed under a SPDES permit.

B-9 COVER SYSTEM RESTORATION

After the completion of soil removal and any other invasive activities the cover system will be restored in a manner that complies with the Order on Consent. The demarcation layer, consisting of orange snow fencing material or equivalent material will be replaced to provide a visual reference to the top of the 'Remaining Contamination Zone', the zone that requires adherence to special conditions for disturbance of remaining contaminated soils defined in this Site Management Plan. If the type of cover system changes from that which exists prior to the this will constitute a modification of the cover element of the remedy and the upper surface of the 'Remaining Contamination. A figure showing the modified surface will be included in the subsequent Periodic Review Report and in any updates to the Site Management Plan.

B-10 BACKFILL FROM OFF-SITE SOURCES

All materials proposed for import onto the site will be approved by the qualified environmental professional and will be in compliance with provisions in this SMP prior to receipt at the site.

Material from industrial sites, spill sites, or other environmental remediation sites or potentially contaminated sites will not be imported to the site.

All imported soils will meet the backfill and cover soil quality standards established in 6NYCRR 375-6.7(d). Based on an evaluation of the land use, protection of groundwater and protection of ecological resources criteria, the resulting soil quality standards are listed in Table 375-6.7(b). Soils that meet 'exempt' fill requirements under 6 NYCRR Part 360, but do not meet backfill or cover soil objectives for this site, will not be imported onto the site without prior approval by NYSDEC. Solid waste will not be imported onto the site.

Trucks entering the site with imported soils will be securely covered with tight fitting covers. Imported soils will be stockpiled separately from excavated materials and covered to prevent dust releases.

B-11 STORMWATER POLLUTION PREVENTION

Barriers and hay bale checks will be installed and inspected once a week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by NYSDEC. All necessary repairs shall be made immediately.

Accumulated sediments will be removed as required to keep the barrier and hay bale check functional.

All undercutting or erosion of the silt fence toe anchor shall be repaired immediately with appropriate backfill materials.

Manufacturer's recommendations will be followed for replacing silt fencing damaged due to weathering.

Erosion and sediment control measures identified in the SMP shall be observed to ensure that they are operating correctly. Where discharge locations or points are accessible, they shall be inspected to ascertain whether erosion control measures are effective in preventing significant impacts to receiving waters

Silt fencing or hay bales will be installed around the entire perimeter of the construction area.

B-12 CONTINGENCY PLAN

If underground tanks or other previously unidentified contaminant sources are found during post-remedial subsurface excavations or development related construction, excavation activities will be suspended until sufficient equipment is mobilized to address the condition.

Sampling will be performed on product, sediment and surrounding soils, etc. as necessary to determine the nature of the material and proper disposal method. Chemical analysis will be performed for full a full list of analytes (TAL metals; TCL volatiles and semi-volatiles, TCL pesticides and PCBs), unless the site history and previous sampling results provide a sufficient justification to limit the list of analytes. In this case, a reduced list of analytes will be proposed to the NYSDEC for approval prior to sampling.

Identification of unknown or unexpected contaminated media identified by screening during invasive site work will be promptly communicated by phone to NYSDEC's Project Manager. Reportable quantities of petroleum product will also be reported to the NYSDEC spills hotline. These findings will be also included in the periodic reports prepared pursuant to Section 5 of the SMP.

B-13 COMMUNITY AIR MONITORING PLAN

Due to the nature of the Site contaminants, a Community Air Monitoring Program has not been prepared for the Site.

B-14 ODOR CONTROL PLAN

An odor control plan has not been incorporated into this excavation plan as it is not necessary due the type of contaminant found at the site.

B-15 DUST CONTROL PLAN

A dust suppression plan that addresses dust management during invasive on-site work will include, at a minimum, the items listed below:

- Dust suppression will be achieved through the use of a dedicated on-site water truck for road wetting. The truck will be equipped with a water cannon capable of spraying water directly onto off-road areas including excavations and stockpiles.
- Clearing and grubbing of larger sites will be done in stages to limit the area of exposed, unvegetated soils vulnerable to dust production.
- Gravel will be used on roadways to provide a clean and dust-free road surface.
- On-site roads will be limited in total area to minimize the area required for water truck sprinkling.

B-16 OTHER NUISANCES

A plan for rodent control will be developed and utilized by the contractor prior to and during site clearing and site grubbing, and during all remedial work.

A plan will be developed and utilized by the contractor for all remedial work to ensure compliance with local noise control ordinances.

APPENDIX C:
FIELD BOOK & GROUNDWATER SAMPLING LOG

APPENDIX D:
SITE WIDE INSPECTION FORM

ANNUAL SITE-WIDE INSPECTION FORM		APPENDIX D: NYS DEC - SITE MONITORING PLAN	
PROJECT NAME: Former "Our Cleaners" Site		PROJECT CODE: B9-0740-07-03	
PROPERTY OWNER: SRK Colvin-Eggert Plaza Associates LP			
PROJECT ADDRESS: 3163 Eggert Rd.			
CITY: Tonawanda		COUNTY: Erie	
INSPECTION CONTACT NAME:		INSPECTION CONTACT TELEPHONE:	
INSPECTION FREQUENCY:		CURRENT PROPERTY ZONING:	
SECTION I: VERIFICATION OF RESTRICTIONS			
1. Has unauthorized construction or excavation occurred?		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
2. Continuous compliance with all ICs, including site usage		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
3. Compliance with schedules included in the Operation and Maintenance Plan		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
4. Water wells are intact and operational		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
5. All permanent survey markers, benchmarks, and monitoring stations are in place as designated		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
6. Site records are up to date		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
7. The property is not being used for restricted agricultural activities, as defined in the I.C.		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
8. Land use type: (check all that apply)		RES. <input type="checkbox"/> COMM. <input type="checkbox"/> REC. <input type="checkbox"/> AG. <input type="checkbox"/> IND. <input type="checkbox"/> VACANT <input type="checkbox"/>	
9. Property zoning excludes residential use		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
10. Has property ownership changed?		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
If yes, new property owner:			
11. Is the property being leased?		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
If yes, new property lessee:			
SECTION II: SITE DESCRIPTION [ATTACH PHOTOS FOR INCLUSION WITH THIS REPORT]			
BRIEFLY DESCRIBE THE CURRENT CONDITION AND USE OF THE PROPERTY:			
GENERAL SITE CONDITIONS AT THE TIME OF THE INSPECTION & SITE MANAGEMENT ACTIVITIES BEING CONDUCTED:			
EVALUATE OF THE CONDITION AND EFFECTIVENESS OF ECs:			
DESCRIBE ANY NEED FOR REPAIRS TO PROTECTIVE STRUCTURES, MONITORING STATIONS, & BENCHMARKS (EROSION, CRACKING, SETTLEMENT, SUBSIDENCE, ETC.):			
SECTION III: INSPECTOR INFORMATION			
INSPECTOR NAME:		PROFESSIONAL AFFILIATION:	
INSPECTION DATE:		SIGNATURE:	

APPENDIX E:
RECORD OF SITE INSPECTION FORM

APPENDIX F:
INSTITUTIONAL CONTROL FORM

INSTITUTIONAL CONTROL INSPECTION FORM		APPENDIX F: NYS DEC - SITE MONITORING PLAN	
PROJECT NAME: Former "Our Cleaners" Site		PROJECT CODE: B9-0740-07-03	
PROPERTY OWNER: SRK Colvin-Eggert Plaza Associates LP			
PROJECT ADDRESS: 3163 Eggert Rd.			
CITY: Tonawanda		COUNTY: Erie	
INSPECTION CONTACT NAME:		INSPECTION CONTACT TELEPHONE:	
INSPECTION FREQUENCY:		CURRENT PROPERTY ZONING:	
SECTION I: VERIFICATION OF RESTRICTIONS			
1. Unauthorized construction or excavation has not occurred		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
2. Vegetation is present and in acceptable condition?		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
3. Water wells not used for restrictive purposes as defined in the Institutional Control		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
4. All permanent survey markers, benchmarks, and monitoring stations are in place as designated		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
5. Site security measures include: (check all that apply)		SIGNS <input type="checkbox"/> FENCES <input type="checkbox"/> GATES <input type="checkbox"/> SECURITY GUARD <input type="checkbox"/>	
6. The property is used for non-residential purposes only		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
7. the property is not being used for restricted agricultural activities, as defined in the I.C.		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
8. Land use type: (check all that apply)		RES. <input type="checkbox"/> COMM. <input type="checkbox"/> REC. <input type="checkbox"/> AG. <input type="checkbox"/> IND. <input type="checkbox"/> VACANT <input type="checkbox"/>	
9. Property zoning excludes residential use		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
10. Property zoning has not changed since issuance of IC		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
11. IC is recorded at the state register of deeds		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
12. The name of property owner on file with the NYS DEC matches the owner listed on the deed		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
13. Has property ownership changed?		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
If yes, new property owner:			
14. Is the property being leased?		YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/>	
If yes, new property lessee:			
SECTION II: SITE DESCRIPTION [ATTACH PHOTOS FOR INCLUSION WITH THIS REPORT]			
BRIEFLY DESCRIBE THE CURRENT CONDITION AND USE OF THE PROPERTY:			
DESCRIBE ANY IMPROVEMENT MADE TO PROPERTY SINCE PREVIOUS INSPECTION:			
DESCRIBE ANY NEED FOR REPAIRS TO PROTECTIVE STRUCTURES, MONITORING STATIONS, BENCHMARKS, OR OTHER FEATURES (EROSION, CRACKING, SETTLEMENT, SUBSIDENCE, ETC.):			
SECTION III: INSPECTOR INFORMATION			
INSPECTOR NAME:		PROFESSIONAL AFFILIATION:	
INSPECTION DATE:		SIGNATURE:	

APPENDIX G:
IRM INVESTIGATION BORING LOGS

EPS of Vermont		Subsurface Log			Hole No.: MW-1	Date Started: 11/18/2008											
Client: Benchmark Mgt. Corp.		Method of investigation: 4 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 11/18/2008										
Location: Colvin - Eggert Plaza		and 1" CMT Multi Channel Well															
Project No.: B1585		Drilling Co.: Parratt Wolff		Driller: Mickey Marshall		Weather: Overcast, 30°											
P. Manager: S. Leitten		Geologist: Steve Leitten		D. Helper: Brian Pisagna													
				Drill Rig: Ingersoll Rand A300													
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations								
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery												
5	1	.5'-5.0'	N/A	N/A	100%	0'-.5': Asphalt and Sub base Gravel	0 ppm		water @ 10.0'								
		drill cuttings				.5'-5': Brown Silt, little Clay, moist											
						5'-10': Brown f. Sand, tr. Silt, moist											
10	2	5.0'-7.0'	N/A	N/A	50%	10'-20': Brown m. Sand, tr. Silt, wet				0 ppm		water @ 10.0'					
	3	7.0'-10.0'	N/A	N/A	100%					0 ppm							
		drill cuttings								0 ppm							
15	4	10.0'-12.0'	N/A	N/A	50%	20'-27': Brown f. Sand, little Silt, wet				0 ppm				water @ 10.0'			
	5	12.0'-15.0'	N/A	N/A	100%					0 ppm							
		drill cuttings								0 ppm							
20	6	15.0'-17.0'	N/A	N/A	30%					20'-27': Brown f. Sand, little Silt, wet					0 ppm		water @ 10.0'
	7	17.0'-20.0'	N/A	N/A	100%										0 ppm		
		drill cuttings													0 ppm		
25	8	20.0'-22.0'	N/A	N/A	75%	27'-29': Brown Silt, tr. f. Sand, moist	0 ppm		water @ 10.0'								
	9	22.0'-25.0'	N/A	N/A	100%		0 ppm										
		drill cuttings					0 ppm										
30	10	25.0'-27.0'	N/A	N/A	100%	29'-31': Brown Silt Till, little f. Sand and Clay, tr. f. Gravel Sample number 4 submitted for laboratory analysis	0 ppm				water @ 10.0'						
	11	27.0'-29.0'	N/A	N/A	100%		0 ppm										
	12	29.0'-31.0'	N/A	N/A	100%		0 ppm										
						0 ppm						water @ 10.0'					
						0 ppm											
						0 ppm											
						0 ppm											
						0 ppm											
						0 ppm											
						0 ppm											
						0 ppm											
						0 ppm											
						0 ppm											
						0 ppm											

Sample Types:

S = Split Spoon: _____
R = Rock Core: _____

T = Shelby Tube: _____
O = Macro-Core: _____

N = ASTM D1586

Backfill Well Key

- Cement
- Native Fill
- Sand
- Bentonite

EPS of Vermont		Subsurface Log			Hole No.: MW-2	Date Started: 11/24/2008			
Client: Benchmark Mgt. Corp.		Method of investigation: 4 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 11/24/2008		
Location: Colvin - Eggert Plaza		and 1" CMT Multi Channel Well							
Project No.: B1585		Drilling Co.: Parratt Wolff		Driller: Mickey Marshall		Weather: Overcast, 30°			
P. Manager: S. Leitten		Geologist: Steve Leitten		D. Helper: Brian Pisagna					
				Drill Rig: Ingersoll Rand A300					
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5	1	.5'-5.0'	N/A	N/A	100%	0'-.5': Asphalt and Sub base Gravel .5'-6': Black C. Sand, little Gravel, moist			
		drill cuttings							
10	2	5.0'-7.0'	N/A	N/A	20%	6'-7': Brown Silt and Clay, moist 7'-10': Brown m. Sand, tr. Silt, moist 10'-20': Brown m. Sand, tr. Silt, wet			water @ 10.0'
	3	7.0'-10.0'	N/A	N/A	100%				
		drill cuttings							
15	4	10.0'-12.0'	N/A	N/A	50%				
	5	12.0'-15.0'	N/A	N/A	100				
20	6	15.0'-17.0'	N/A	N/A	25%	20'-26': Brown f. Sand, little Silt, wet			
	7	17.0'-20.0'	N/A	N/A	100%				
		drill cuttings							
25	8	20.0'-22.0'	N/A	N/A	70%	26'-27': Brown Silt, little f. Sand, moist 27'-29': Brown Silt Till, tr. f. Sand, tr. f/m Gravel, moist Sample number 1 submitted for laboratory analysis			
	9	22.0'-25.0'	N/A	N/A	100%				
		drill cuttings							
30	10	25.0'-27.0'	N/A	N/A	100%				
	11	27.0'-29.0'	N/A	N/A	50%				
Sample Types:						Backfill Well Key			
S = Split Spoon: _____		T = Shelby Tube: _____				Bentonite		Native Fill	
R = Rock Core: _____		O = Macro-Core: _____				Sand		Cement	
N = ASTM D1586									

EPS of Vermont		Subsurface Log			Hole No.: RW-2	Date Started: 4/27/2009			
Client: Benchmark Mgt. Corp.		Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer			Sheet 1 of 1	Date Finished: 4/27/2009			
Location: Colvin - Eggert Plaza		and 2" Nested Wells							
Project No.: B1585		Drilling Co.: Quality Inspection Services Incorporated		Driller: Ron Brown		Weather: mostly sunny 50°			
P. Manager: S. Leitten		Geologist: Adam Morse		D. Helper: Jim La Santa					
				Drill Rig: Diedrich D-50 Turbo					
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'-.5': Asphalt and Sub base Gravel	0.0 ppm		
						0.5'-5': Red brown Clay and Silt, some sand and Gravel, moist	0.0 ppm		
						5.0'-7.0': Red brown f. Sand and Silt, tr. Clay, moist	0.0 ppm		
10	1	5'-7'	4 5 12			7.0'-10.0': Red brown f/m Sand, little Silt, moist	0.0 ppm		
			7 12			10.0'-25.0': Same as above but wet	0.0 ppm		
15							0.0 ppm		
							0.0 ppm		
20	3	15'-17'					0.0 ppm		
							0.0 ppm		
25							0.0 ppm		
	4	20'-22'				25.0'-27.0': f. Sand and Silt, tr. Clay, wet	0.0 ppm		
30							0.0 ppm		
		25'-27'					0.0 ppm		

Sample Types:

S = Split Spoon: _____
R = Rock Core: _____

T = Shelby Tube: _____
O = Macro-Core: _____

N = ASTM D1586

Backfill Well Key

- Grout
- Native Fill
- Sand
- Bentonite

EPS of Vermont		Subsurface Log			Hole No.: MW-3	Date Started: 11/20/2008			
Client: Benchmark Mgt. Corp.		Method of investigation: 4 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 11/20/2008		
Location: Colvin - Eggert Plaza		and 1" CMT Multi Channel Well							
Project No.: B1585		Drilling Co.: Parratt Wolff		Driller: Mickey Marshall		Weather: Overcast, 30°			
P. Manager: S. Leitten		Geologist: Randy Klosko		D. Helper: Brian Pisagna					
				Drill Rig: Ingersoll Rand A300					
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5	1	.5'-5.0'	N/A	N/A	100%	0'-.5': Asphalt and Sub base Gravel .5'-5': Brown Silt, little Clay, moist .5': Organic Mulch			
		drill cuttings							
10	2	5.0'-7.0'	N/A	N/A	50%	5'-10': Brown f. Sand, tr. Silt, moist	0 ppm		
	3	7.0'-10.0'	N/A	N/A	100%				
		drill cuttings							
15	4	10.0'-12.0'	N/A	N/A	60%	10'-15': Brown f. Sand, tr. Silt, wet	0 ppm		water @ 10'
	5	12.0'-15.0'	N/A	N/A	100%				
		drill cuttings							
20	6	15.0'-17.0'	N/A	N/A	75%	15'-17': Red brown f. Sand, little Silt, wet	0 ppm		
	7	17.0'-20.0'	N/A	N/A	100%				
		drill cuttings							
25	8	20.0'-22.0'	N/A	N/A	100%	17'-20': Lt. brown f. Sand, some Silt, wet	4.5ppm		
	9	22.0'-25.0'	N/A	N/A	100%				
		drill cuttings							
30	10	25.0'-27.0'	N/A	N/A	65%	20'-29': Brown f. Sand, some Silt, wet	NA		
	11	27.0'-29.0'	N/A	N/A	100%				
		drill cuttings							
						29'-30': Brown Silt Till, little Clay, tr. f. Gravel			
						Sample number 8 submitted for laboratory analysis	0 ppm		
							0 ppm		

Sample Types:

S = Split Spoon: _____

R = Rock Core: _____

N = ASTM D1586

T = Shelby Tube: _____

O = Macro-Core: _____

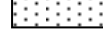
Backfill Well Key



Cement



Native Fill



Sand



Bentonite

EPS of Vermont		Subsurface Log			Hole No.: MW-4	Date Started: 11/20/2008			
Client: Benchmark Mgt. Corp.		Method of investigation: 4 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 11/20/2008		
Location: Colvin - Eggert Plaza		and 1" CMT Multi Channel Well							
Project No.: B1585		Drilling Co.: Parratt Wolff		Driller: Mickey Marshall		Weather: Overcast, 30°			
P. Manager: S. Leitten		Geologist: Randy Klosko		D. Helper: Brian Pisagna					
				Drill Rig: Ingersoll Rand A300					
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5	1	.5'-5.0'	N/A	N/A	100%	0'- .5': Organic Mulch			water @ 11'
		drill cuttings				.5'- 5': Brown f. Sand, tr. Silt, moist			
10	2	5.0'-7.0'	N/A	N/A	75%	5'-7': Gray brown f. Sand, little Silt, moist	0 ppm		
	3	7.0'-10.0'	N/A	N/A	100%	7'-10': Brown f. Sand, little Silt, moist	0.9 ppm		
		drill cuttings				10'-15': Brown m. Sand, wet	0.6 ppm		
15	4	10.0'-12.0'	N/A	N/A	60%		0.6 ppm		
	5	12.0'-15.0'	N/A	N/A	100%	15'-26': Brown f. Sand, tr. Silt, wet	0.0 ppm		
20	6	15.0'-17.0'	N/A	N/A	90%		0.3 ppm		
	7	17.0'-20.0'	N/A	N/A	100%		0 ppm		
25	8	20.0'-22.0'	N/A	N/A	100%		0 ppm		
	9	22.0'- 25.0'	N/A	N/A	100%	26'-27': Brown Silt, little f. Sand and Clay, tr. Gravel, moist	0 ppm		
30	10	25.0'-27.0'	N/A	N/A	100%	27'-30': Brown Silt Till, little Clay, tr. f. Gravel	0 ppm		
	11	27.0'-29.0'	N/A	N/A	100%	Sample number 2 submitted for laboratory analysis	0 ppm		

Sample Types:

S = Split Spoon: _____

R = Rock Core: _____

N = ASTM D1586

T = Shelby Tube: _____

O = Macro-Core: _____

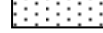
Backfill Well Key



Cement



Native Fill



Sand



Bentonite

EPS of Vermont		Subsurface Log			Hole No.: MW-5	Date Started: 11/18/2008			
Client: Benchmark Mgt. Corp.		Method of investigation: 4 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 11/18/2008		
Location: Colvin - Eggert Plaza		and 1" CMT Multi Channel Well							
Project No.: B1585		Drilling Co.: Parratt Wolff		Driller: Mickey Marshall		Weather: Overcast, 30°			
P. Manager: S. Leitten		Geologist: Steve Leitten		D. Helper: Brian Pisagna					
				Drill Rig: Ingersoll Rand A300					
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5	1	.5'-5.0'	N/A	N/A	100%	0'-.5' Topsoil and mulch .5'-6': Brown f. Sand, tr. Silt, moist			
		drill cuttings							
10	2	5.0'-7.0'	N/A	N/A	50%	6'-7': Gray brown f. Sand, little Silt, moist 7'-10': Brown f. Sand, little Silt, moist	0 ppm		
	3	7.0'-10.0'	N/A	N/A	100%				
		drill cuttings							
15	4	10.0'-12.0'	N/A	N/A	70%	10'-15': Brown m. Sand, wet	0 ppm		water @ 10.0'
	5	12.0'-15.0'	N/A	N/A	100%				
		drill cuttings							
20	6	15.0'-17.0'	N/A	N/A	75%	15'-26': Brown f. Sand, tr. Silt, wet	0 ppm		
	7	17.0'-20.0'	N/A	N/A	100%				
		drill cuttings							
25	8	20.0'-22.0'	N/A	N/A	75%	26'-27': Brown Silt, little f. Sand and Clay, tr. Gravel, moist 27'-30': Brown Silt Till, little Clay, tr. f. Gravel	0 ppm		
	9	22.0'-25.0'	N/A	N/A	100%				
		drill cuttings							
30	10	25.0'-27.0'	N/A	N/A	90%	Sample number 4 submitted for laboratory analysis	0 ppm		
	11	27.0'-29.0'	N/A	N/A	100%				

Sample Types:

S = Split Spoon: _____

R = Rock Core: _____

N = ASTM D1586

T = Shelby Tube: _____

O = Macro-Core: _____

Backfill Well Key



Cement



Native Fill



Sand



Bentonite

EPS of Vermont		Subsurface Log			Hole No.: MW-6	Date Started: 11/18/2008			
Client: Benchmark Mgt. Corp.		Method of investigation: 4 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 11/18/2008		
Location: Colvin - Eggert Plaza		and 1" CMT Multi Channel Well							
Project No.: B1585		Drilling Co.: Parratt Wolff		Driller: Mickey Marshall		Weather: Overcast, 30°			
P. Manager: S. Leitten		Geologist: Steve Leitten		D. Helper: Brian Pisagna					
				Drill Rig: Ingersoll Rand A300					
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5	1	.5'-5.0'	N/A	N/A	100%	0'-.5': Asphalt and Sub base Gravel .5'-5': Brown Silt, little Clay, moist 5'-10': Brown f. Sand, tr. Silt, moist	0 ppm		water @ 10.0'
		drill cuttings							
10	2	5.0'-7.0'	N/A	N/A	50%	10'-11': Brown f. Sand, tr. Silt, wet 11'-12': Brown Silt and f. Sand, tr. Clay, wet 12'-17': Brown m. Sand, tr. Silt, wet	0 ppm		
	3	7.0'-10.0'	N/A	N/A	100%				
		drill cuttings							
15	4	10.0'-12.0'	N/A	N/A	70%	17'-26.5': Brown f. Sand, tr. Silt, wet	0 ppm		
	5	12.0'-15.0'	N/A	N/A	100%				
		drill cuttings							
20	6	15.0'-17.0'	N/A	N/A	75%	26.5'-27': Brown Silt, little f. Sand and Clay, tr. Gravel, moist 27'-29': Brown Silt, tr. f. Sand, moist	0 ppm		
	7	17.0'-20.0'	N/A	N/A	100%				
		drill cuttings							
25	8	20.0'-22.0'	N/A	N/A	100%	Sample number 4 sent for laboratory analysis	0 ppm		
	9	22.0'-25.0'	N/A	N/A	100%				
		drill cuttings							
30	10	25.0'-27.0'	N/A	N/A	100%		0 ppm		
	11	27.0'-29.0'	N/A	N/A	100%				

Sample Types:

S = Split Spoon: _____

R = Rock Core: _____

N = ASTM D1586

T = Shelby Tube: _____

O = Macro-Core: _____

Backfill Well Key



Cement



Native Fill



Sand



Bentonite

EPS of Vermont		Subsurface Log			Hole No.: MW-7	Date Started: 11/21/2008			
Client: Benchmark Mgt. Corp.		Method of investigation: 4 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 11/21/2008		
Location: Colvin - Eggert Plaza		and 1" CMT Multi Channel Well							
Project No.: B1585		Drilling Co.: Parratt Wolff		Driller: Mickey Marshall		Weather: Overcast, 30°			
P. Manager: S. Leitten		Geologist: Steve Leitten		D. Helper: Brian Pisagna					
				Drill Rig: Ingersoll Rand A300					
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5	1	.5'-5.0'				0'-.5': Asphalt and Sub base Gravel .5'-5': Brown Silt, little Clay, moist			water @ 10.0'
		drill cuttings				5'-10': Brown m. Sand, tr. Silt, moist	0 ppm		
10	2	5.0'-7.0'	N/A	N/A	70%	10'-19.5': Brown m. Sand, tr. Silt, wet	0 ppm		
	3	7.0'-10.0'					0 ppm		
		drill cuttings					0 ppm		
15	4	10.0'-12.0'	N/A	N/A	25%	19.5'-20.0': Brown f. Sand, little Silt 20'-25.5': Brown m. Sand, tr. Silt, wet	0 ppm		
	5	12.0'-14.0'	N/A	N/A	90%		0 ppm		
	6	14.0'-16.0'	N/A	N/A	90%		0 ppm		
20	7	16.0'-18.0'	N/A	N/A	80%	25.5'-26': Silt and f. Sand, tr. Clay, moist 26'-28': Silt and f. Gravel Till, little f. Sand, tr. Clay	0 ppm		
	8	18.0'-20.0'	N/A	N/A	75%		0.3 ppm		
	9	20.0'-22.0'	N/A	N/A	100%		0 ppm		
25	10	22.0'-24.0'	N/A	N/A	100%	Sample number 10 sent for laboratory analysis	0.5 ppm		
	11	24.0'-26.0'	N/A	N/A	70%		0 ppm		
	12	26.0'-28.0'	N/A	N/A	30%		0 ppm		
30									

Sample Types:

S = Split Spoon: _____
R = Rock Core: _____

T = Shelby Tube: _____
O = Macro-Core: _____

N = ASTM D1586

Backfill Well Key

	Cement		Native Fill
	Sand		Bentonite

EPS of Vermont		Subsurface Log			Hole No.: MW-8	Date Started: 11/17/2008			
Client: Benchmark Mgt. Corp.		Method of investigation: 4 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 11/17/2008		
Location: Colvin - Eggert Plaza		and 1" CMT Multi Channel Well							
Project No.: B1585		Drilling Co.: Parratt Wolff		Driller: Mickey Marshall		Weather: Overcast, 30°			
P. Manager: S. Leitten		Geologist: Steve Leitten		D. Helper: Brian Pisagna					
				Drill Rig: Ingersoll Rand A300					
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5	1	0.5'-2.0'	N/A	N/A	50%	0'-.5': Asphalt and Sub base Gravel .5'-5.5': Coarse Gray Gravel and m. Sand backfill, moist	0.1 ppm		water @ 10.0'
	2	2.0'-4.0'	N/A	N/A	75%		1.5 ppm		
3	4.0'-6.0'	N/A	N/A	50%	5.5'-13.5': Brown Sand, little Silt, moist	0 ppm			
4	6.0'-8.0'	N/A	N/A	75%		0 ppm			
5	8.0'-10.0'	N/A	N/A	50%	13.5'-14.0': Red brown Clay, some Silt, moist 14'-19.5': Brown Sand, little Silt, moist	0 ppm			
6	10.0'-12.0'	N/A	N/A	50%		0 ppm			
7	12.0'-14.0'	N/A	N/A	100%	19.5'-20.0': Brown f. Sand, little Silt 20'-28': Brown f. Sand, some Silt	0 ppm			
8	14.0'-16.0'	N/A	N/A	100%		0 ppm			
9	16.0'-18.0'	N/A	N/A	100%	28'-33': Brown f. Sand and Silt Till tr. f. Gravel, moist	0 ppm			
10	18.0'-20.0'	N/A	N/A	100%		0.3 ppm			
11	20.0'-22.0'	N/A	N/A	100%	Sample number 6 sent for laboratory analysis	0 ppm			
12	22.0'-24.0'	N/A	N/A	100%		0 ppm			
13	24.0'-26.0'	N/A	N/A	100%	Sample number 6 sent for laboratory analysis	0 ppm			
14	26.0'-28.0'	N/A	N/A	100%		0 ppm			
15	28.0'-30.0'	N/A	N/A	100%	Sample number 6 sent for laboratory analysis	0 ppm			
16	30.0'-32.0'	N/A	N/A	75%		0 ppm			
17	32.0'-33.0'	N/A	N/A	75%		0 ppm			

Sample Types:

S = Split Spoon: _____

R = Rock Core: _____

N = ASTM D1586

T = Shelby Tube: _____

O = Macro-Core: _____

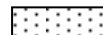
Backfill Well Key



Cement



Native Fill



Sand



Bentonite

EPS of Vermont			Subsurface Log			Hole No.: MW-9		Date Started: 1/19/2009	
Client: Benchmark Mgt. Corp.			Method of investigation: 4 1/4" HSA, 2" split spoon with auto hammer						
Location: Colvin - Eggert Plaza			and 1" CMT Multi Channel Well						
Project No.: B1585			Drilling Co.: Parratt Wolff			Driller: Mickey Marshall		Weather: flurries, 20°	
P. Manager: S. Leitten			Geologist: Steve Leitten			D. Helper: Mike Ellingsworth		Drill Rig: Ingersoll Rand A300	
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5	1	.5'-5.0'	N/A	N/A	100%	0'-.5': Asphalt and Sub base Gravel .5'-5': Brown Silt, little Clay, moist	0.0 ppm		water @ 10.0'
		drill cuttings							
10	2	5.0'-7.0'	N/A	N/A	50%	5'-10': Red brown m. Sand, tr. Silt, moist	0.0 ppm		
	3	7.0'-10.0'	N/A	N/A	100%				
15		drill cuttings				10'-15': Red brown m. Sand, tr. Silt wet	0.0 ppm		
	4	10.0'-12.0'	N/A	N/A	80%				
20	5	12.0'-15.0'	N/A	N/A	100%	15'-20': Fine Sand, tr. Silt, wet	0.0 ppm		
		drill cuttings							
25	6	15.0'-17.0'	N/A	N/A	100%	20'-22': Brown f. Sand some Silt, wet	0.0 ppm		
	7	17.0'-20.0'	N/A	N/A	100%				
30		drill cuttings				22'-25': Brown Silt and f. Sand, tr. Gravel, moist	0.0 ppm		
	8	20.0'-22.0'	N/A	N/A	75%				
	9	22.0'-25.0'	N/A	N/A	100%	25'-27': Brown Silt Till some f. Sand, tr. Gravel, moist	0.0 ppm		
		drill cuttings							
	10	25.0'-27.0'	N/A	N/A	75%		0.0 ppm		

Sample Types:

S = Split Spoon: _____
 R = Rock Core: _____

T = Shelby Tube: _____
 O = Macro-Core: _____

N = ASTM D1586

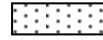
Backfill Well Key



Cement



Native Fill



Sand



Bentonite

EPS of Vermont		Subsurface Log			Hole No.: MW-10		Date Started: 1/20/2009		
Client: Benchmark Mgt. Corp.		Method of investigation: 4 1/4" HSA, 2" split spoon with auto hammer			Sheet 1 of 1		Date Finished: 1/20/2009		
Location: Colvin - Eggert Plaza		and 1" CMT Multi Channel Well			Drilling Co.: Parratt Wolff		Driller: Mickey Marshall		
Project No.: B1585		Geologist: Randy Klosko			D. Helper: Mike Ellingsworth		Weather: flurries, 20°		
P. Manager: S. Leitten		Drill Rig: Ingersoll Rand A300							
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5	1	.5'-5.0'	N/A	N/A	100%	0'-.5': Asphalt and Sub base Gravel .5'-5': Brown Silt, little Clay, moist 5'-7': Red brown Clay and Silt, tr. Sand and Gravel, moist	0.0 ppm		water @ 10.0'
		drill cuttings							
10	2	5.0'-7.0'	N/A	N/A	75%	7'-10': Red brown Clay and Silt, tr. Sand and Gravel, wet 10'-25': Brown f/m Sand, tr. Silt, wet	0.0 ppm		
	3	7.0'-10.0'	N/A	N/A	100%				
		drill cuttings							
15	4	10.0'-12.0'	N/A	N/A	75%		0.0 ppm		
	5	12.0'-15.0'	N/A	N/A	NA				
		drill cuttings							
20	6	15.0'-17.0'	N/A	N/A	80%		0.0 ppm		
	7	17.0'-20.0'	N/A	N/A	NA				
		drill cuttings							
25	8	20.0'-22.0'	N/A	N/A	75%	25'-27': Brown Silt Till and f. Sand, tr. Gravel, moist 27'-29': Brown Silt Till, some f. Sand, tr. Gravel	0.0 ppm		
	9	22.0'-25.0'	N/A	N/A					
		drill cuttings							
30	10	25.0'-27.0'	N/A	N/A	75%		0.0 ppm		
	11	27.0'-29.0'	N/A	N/A	75%				

Sample Types:

S = Split Spoon: _____

R = Rock Core: _____

N = ASTM D1586

T = Shelby Tube: _____

O = Macro-Core: _____

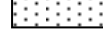
Backfill Well Key



Cement



Native Fill



Sand



Bentonite

EPS of Vermont		Subsurface Log			Hole No.: MW-11		Date Started: 1/21/2009		
Client: Benchmark Mgt. Corp.		Method of investigation: 4 1/4" HSA, 2" split spoon with auto hammer			Sheet 1 of 1		Date Finished: 1/21/2009		
Location: Colvin - Eggert Plaza		and 1" CMT Multi Channel Well			Driller: Mickey Marshall		Weather: flurries, 5°		
Project No.: B1585		Drilling Co.: Parratt Wolff			D. Helper: Mike Ellingsworth		Drill Rig: Ingersoll Rand A300		
P. Manager: S. Leitten		Geologist: Steve Leitten							
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5	1	.5'-5.0'	N/A	N/A	100%	0'-0.5': Asphalt and Sub base Gravel 0.5'-10': Reworked material gravel fill (limestone)	0.0 ppm		water @ 10.0'
		drill cuttings							
10	2	5.0'-7.0'	N/A	N/A	30%	10'-25': Brown f/m Sand, tr. Silt, wet	0.0 ppm		
	3	7.0'-10.0'	N/A	N/A	100%				
		drill cuttings							
15	4	10.0'-12.0'	N/A	N/A	30%		0.0 ppm		
	5	12.0'-15.0'	N/A	N/A	NA				
		drill cuttings							
20	6	15.0'-17.0'	N/A	N/A	100%		0.0 ppm		
	7	17.0'-20.0'	N/A	N/A	100%				
		drill cuttings							
25	8	20.0'-22.0'	N/A	N/A	100%	25'-27': Brown Silt Till and f. Sand, tr. Gravel, moist	0.0 ppm		
	9	22.0'-25.0'	N/A	N/A	100%	27'-29': Brown Silt Till, some f. Sand, tr. Gravel			
		drill cuttings							
30	10	25.0'-27.0'	N/A	N/A	30%		0.0 ppm		
	11	27.0'-29.0'	N/A	N/A	75				

Sample Types:

S = Split Spoon: _____
R = Rock Core: _____

T = Shelby Tube: _____
O = Macro-Core: _____

N = ASTM D1586

Backfill Well Key

- Cement
- Native Fill
- Sand
- Bentonite

EPS of Vermont		Subsurface Log			Hole No.: MW-12	Date Started: 1/22/2009											
Client: Benchmark Mgt. Corp.		Method of investigation: 4 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 1/22/2009										
Location: Colvin - Eggert Plaza		and 1" CMT Multi Channel Well															
Project No.: B1585		Drilling Co.: Parratt Wolff		Driller: Mickey Marshall		Weather: overcast, 28°											
P. Manager: S. Leitten		Geologist: Steve Leitten		D. Helper: Mike Ellingsworth		Drill Rig: Ingersoll Rand A300											
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations								
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery												
5	1	.5'-5.0'	N/A	N/A	100%	0'-.5': Asphalt and Sub base Gravel .5'-5': Brown Silt, little Clay, moist	0.0 ppm		water @ 10.0'								
			drill cuttings														
10	2	5.0'-7.0'	N/A	N/A	75%	5'-10': Brown f/m Sand, tr. Silt, moist	0.0 ppm			water @ 10.0'							
	3	7.0'-10.0'	N/A	N/A	100%												
15						10'-20': Brown f/m Sand, tr. Silt, wet	0.0 ppm					water @ 10.0'					
			drill cuttings														
20	4	10.0'-12.0'	N/A	N/A	75%	20'-25': Brown Silt, some f. Sand, moist	0.0 ppm							water @ 10.0'			
	5	12.0'-15.0'	N/A	N/A	100%												
25						25'-27': Brown Silt Till, little f. Sand, tr. Gravel moist	0.0 ppm									water @ 10.0'	
			drill cuttings														
30	6	15.0'-17.0'	N/A	N/A	80%	25'-27': Brown Silt Till, little f. Sand, tr. Gravel moist	0.5 ppm										water @ 10.0'
	7	17.0'-20.0'	N/A	N/A	100%												
							0.0 ppm			water @ 10.0'							
			drill cuttings														
	8	20.0'-22.0'	N/A	N/A	75%		0.0 ppm					water @ 10.0'					
	9	22.0'-25.0'	N/A	N/A	100%												
							0.0 ppm							water @ 10.0'			
			drill cuttings														
	10	25.0'-27.0'	N/A	N/A	80%		0.0 ppm									water @ 10.0'	
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EPS of Vermont		Subsurface Log			Hole No.: MW-13		Date Started: 1/21/2009		
Client: Benchmark Mgt. Corp.		Method of investigation: 4 1/4" HSA, 2" split spoon with auto hammer			Sheet 1 of 1		Date Finished: 1/21/2009		
Location: Colvin - Eggert Plaza		and 1" CMT Multi Channel Well			Drilling Co.: Parratt Wolff		Driller: Mickey Marshall		
Project No.: B1585		Geologist: Steve Leitten			D. Helper: Mike Ellingsworth		Weather: flurries, 20°		
P. Manager: S. Leitten					Drill Rig: Ingersoll Rand A300				
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5	1	.5'-5.0'	N/A	N/A	100%	0' - 5': Asphalt and Sub base Gravel	0.0 ppm		water @ 10.0'
			drill cuttings			.5' - 5': Brown Silt, little Clay, moist			
10	2	5.0'-7.0'	N/A	N/A	50%	5' - 7': Red brown f. Sand, some Silt, tr. Clay, moist	0.0 ppm		
	3	7.0'-10.0'	N/A	N/A	100%	7'-10': Red brown m. Sand, tr. Silt, moist	0.0 ppm		
15						10'-20': Red brown m. Sand, tr. Silt, wet	0.0 ppm		
	4	10.0'-12.0'	N/A	N/A	25%		0.0 ppm		
20	5	12.0'-15.0'	N/A	N/A	100%		0.0 ppm		
25	6	15.0'-17.0'	N/A	N/A	75%		0.0 ppm		
	7	17.0'-20.0'	N/A	N/A	100%	20'-25': Brown f/m Sand, little Silt, wet	0.0 ppm		
30									
	8	20.0'-22.0'	N/A	N/A	50%	25'-27': Brown Silt Till some f. Sand, tr. Gravel, moist	0.5 ppm		
	9	22.0'-25.0'	N/A	N/A	100%	27'-29': Brown Silt Till some f. Sand, tr. Gravel, moist	0.0 ppm		
	10	25.0'-27.0'	N/A	N/A	80%		0.0 ppm		
	11	27.0'-29.0'	N/A	N/A	75%		0.0 ppm		

Sample Types:

S = Split Spoon: _____

R = Rock Core: _____

N = ASTM D1586

T = Shelby Tube: _____

O = Macro-Core: _____

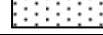
Backfill Well Key



Cement



Native Fill

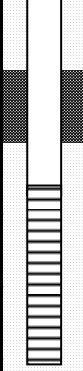
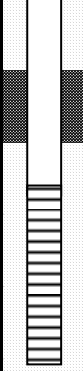
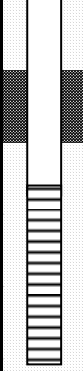
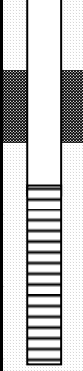
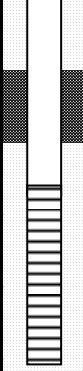
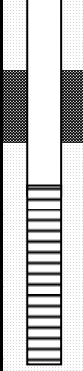
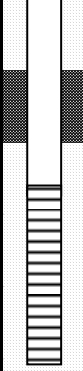
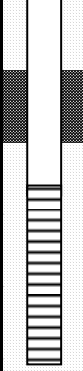






Sand



Bentonite

EPS of Vermont		Subsurface Log		Hole No.: MW-14	Date Started: 1/21/2009						
				Sheet 1 of 1	Date Finished: 1/21/2009						
Client: Benchmark Mgt. Corp.		Method of investigation: Geoprobe Direct Push with 2" macrocore sampler									
Location: Colvin - Eggert Plaza		1" prepacked well installation									
Project No.: B1585 P. Manager: S. Leitten		Drilling Co.: EPS of Vermont		Driller: Adam Morse							
		Geologist: Steve Leitten		D. Helper: NA							
				Drill Rig: Geoprobe 54DT							
				Weather: flurries, 20°							
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations		
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery						
5	1	0'-4'			60%	0'-4': Dk. brown Silt, some f. Sand, moist	0.0 ppm		water @ 10.0'		
	10	2	4'-8'		75%					4'-10': Brown f/m Sand, tr. Silt, moist	0.0 ppm
		3	8'-12'		80%					10'-16': Brown f/m Sand, tr. Silt, moist	
15						0.0ppm					
						0.0 ppm					
20											
25											
30											
Sample Types:						Backfill Well Key					
S = Split Spoon: _____		T = Shelby Tube: _____		Cement		Native Fill					
R = Rock Core: _____		O = Macro-Core: _____		Sand		Bentonite					
N = ASTM D1586											

EPS of Vermont		Subsurface Log		Hole No.: SV-1	Date Started: 4/20/2009				
				Sheet 1 of 1	Date Finished: 4/20/2009				
Client: Benchmark Mgt. Corp.		Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer							
Location: Colvin - Eggert Plaza		and 2" Soil Vapor Extraction Well Installation							
Project No.: B1585 P. Manager: S. Leitten		Drilling Co.: Quality Inspection Services Incorporated		Driller: Ron Brown D. Helper: Jim La Santa					
		Geologist: Adam Morse		Weather: rain, 40°					
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'-.5': Asphalt and Sub base Gravel	0.0 ppm		
						0.5'-8.0': Brown Clay and Silt, little f. Sand, moist	0.0 ppm		
10	1	5'-7'	2 2	6	40	8.0'-12.0'; Brown f.Sand, some Silt, wet	0.0 ppm		
			4 7				0.0 ppm		
15							0.0 ppm		
	2	10'-12'	3 4	9	30		0.0 ppm		
			5 7						
20									
25									
30									
									
Sample Types:						Backfill Well Key			
S = Split Spoon: _____		T = Shelby Tube: _____		 Cement		 Native Fill			
R = Rock Core: _____		O = Macro-Core: _____		 Sand		 Bentonite			
N = ASTM D1586									

EPS of Vermont		Subsurface Log		Hole No.: SV-3	Date Started: 4/21/2009				
				Sheet 1 of 1	Date Finished: 4/21/2009				
Client: Benchmark Mgt. Corp.		Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer							
Location: Colvin - Eggert Plaza		and 2" Soil Vapor Extraction Well Installation							
Project No.: B1585		Drilling Co.: Quality Inspection Services Incorporated		Driller: Ron Brown					
P. Manager: S. Leitten		Geologist: Adam Morse		D. Helper: Jim La Santa					
				Weather: mostly sunny 45°					
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'-.5': Asphalt and Sub base Gravel	0.0 ppm		
						0.5'-4.0': Brown Clay and Silt, some f. Sand, moist			
10	1	5'-7'	6 7	14	50	4.0'-12.0'; Brown f. Sand, little Silt, wet, saturated @ 10.0'	0.0 ppm		
			7 7				0.0 ppm		
15							0.0 ppm		
							0.0 ppm		
20							0.0 ppm		
							0.0 ppm		
25							0.0 ppm		
							0.0 ppm		
30							0.0 ppm		
							0.0 ppm		
Sample Types:						Backfill Well Key			
S = Split Spoon: _____		T = Shelby Tube: _____					Cement		Native Fill
R = Rock Core: _____		O = Macro-Core: _____					Sand		Bentonite
N = ASTM D1586									

Client: Benchmark Mgt. Corp.	Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer
Location: Colvin - Eggert Plaza	and 2" Soil Vapor Extraction Well Installation

Project No.: B1585	Drilling Co.: Quality Inspection Services Incorporated	Driller: Ron Brown	Weather: mostly sunny
P. Manager: S. Leitten	Geologist: Adam Morse	D. Helper: Jim La Santa	50°
		Drill Rig: Diedrich D-50 Turbo	

Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'- .5': Asphalt and Sub base Gravel	0.0 ppm		
						0.5'-4.0': Brown Clay some Silt, moist	0.0 ppm		
10	1	5'-7'	4 2	5	30	4.0'-12.0'; Brown f.Sand, little Silt, wet, saturated @ 10.0'	0.0 ppm		
			3 4				0.0 ppm		
15							0.0 ppm		
							0.0 ppm		
20							0.0 ppm		
							0.0 ppm		
25							0.0 ppm		
							0.0 ppm		
30							0.0 ppm		
							0.0 ppm		

Sample Types: S = Split Spoon: _____ R = Rock Core: _____ N = ASTM D1586	Backfill Well Key Cement Native Fill Sand Bentonite T = Shelby Tube: _____ O = Macro-Core: _____
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EPS of Vermont		Subsurface Log			Hole No.: RW-1	Date Started: 4/28/2009			
Client: Benchmark Mgt. Corp.		Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 4/28/2009		
Location: Colvin - Eggert Plaza		and 2" Nested Wells							
Project No.: B1585		Drilling Co.: Quality Inspection Services Incorporated		Driller: Ron Brown		Weather: rain			
P. Manager: S. Leitten		Geologist: Adam Morse		D. Helper: Jim La Santa		50°			
Drill Rig: Diedrich D-50 Turbo									
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'-.5': Asphalt and Sub base Gravel	0.0 ppm		
						0.5'-10.0': Brown m. sand, moist	0.0 ppm		
10	1	5'-7'	6 6	13	50	10.0'- 27.0': Red brown f/m Sand, tr. Silt, wet	0.0 ppm		
			7 6				0.0 ppm		
15	2	10'-12'	8 6	11	75		0.0 ppm		
			5 9				0.0 ppm		
20	3	15'-17'	WH 10	22	75		0.0 ppm		
			12 15				0.0 ppm		
25	4	20'-22'	WH WH	4	75		0.0 ppm		
			4 6				0.0 ppm		
30		25'-27'	WH 5	14	50		0.0 ppm		
			9 7				0.0 ppm		

Sample Types:

S = Split Spoon: _____

R = Rock Core: _____

N = ASTM D1586

T = Shelby Tube: _____

O = Macro-Core: _____

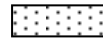
Backfill Well Key



Grout



Native Fill



Sand



Bentonite

EPS of Vermont		Subsurface Log			Hole No.: RW-2	Date Started: 4/27/2009			
Client: Benchmark Mgt. Corp.		Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 4/27/2009		
Location: Colvin - Eggert Plaza		and 2" Nested Wells							
Project No.: B1585 P. Manager: S. Leitten		Drilling Co.: Quality Inspection Services Incorporated		Driller: Ron Brown D. Helper: Jim La Santa		Weather: mostly sunny 50°			
		Geologist: Adam Morse		Drill Rig: Diedrich D-50 Turbo					
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'-.5': Asphalt and Sub base Gravel	0.0 ppm		
						0.5'-5': Red brown Clay and Silt, some sand and Gravel, moist	0.0 ppm		
						5.0'-7.0': Red brown f. Sand and Silt, tr. Clay, moist	0.0 ppm		
10	1	5'-7'	4 5 12		50	7.0'-10.0': Red brown f/m Sand, little Silt, moist	0.0 ppm		
			7 12			10.0'-25.0': Same as above but wet	0.0 ppm		
							0.0 ppm		
15	2	10'-12'	8 10 28		55		0.0 ppm		
			14 15				0.0 ppm		
							0.0 ppm		
20	3	15'-17'	1 7 17		50		0.0 ppm		
			10 15				0.0 ppm		
							0.0 ppm		
25	4	20'-22'	WH 5 12		75	25.0'-27.0': f. Sand and Silt, tr. Clay, wet	0.0 ppm		
			7 14				0.0 ppm		
							0.0 ppm		
30		25'-27'	WH 5		70		0.0 ppm		
			8 9						

Sample Types:

S = Split Spoon: _____
R = Rock Core: _____

T = Shelby Tube: _____
O = Macro-Core: _____

N = ASTM D1586

Backfill Well Key

- Grout
- Native Fill
- Sand
- Bentonite

EPS of Vermont	Subsurface Log	Hole No.: RW-4	Date Started: 4/27/2009
		Sheet 1 of 1	Date Finished: 4/27/2009

Client: Benchmark Mgt. Corp. Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer
 Location: Colvin - Eggert Plaza and 2" Nested Wells

Project No.: B1585 Drilling Co.: Quality Inspection Services Incorporated Driller: Ron Brown Weather: mostly sunny
 P. Manager: S. Leitten Geologist: Steve Leitten D. Helper: Jim La Santa Drill Rig: Diedrich D-50 Turbo 60

Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'-.5': Asphalt and Sub base Gravel	0.0 ppm		
						0.5'-3.0': Black m. Sand, moist	0.0 ppm		
						3.0'-5.0': Red brown Silt and Clay, some Sand and Gravel, moist	0.0 ppm		
10	1	5'-7'	3 6	12	90	5.0'-10.0': Red brown m. Sand, little tr. Silt, moist	0.0 ppm		
			6 7				0.0 ppm		
						10.0'-25.0': Same as above but wet	0.0 ppm		
15	2	10'-12'	2 1	2	60		0.0 ppm		
			1 2				0.0 ppm		
							0.0 ppm		
20	3	15'-17'	5 6	12	50		11.8 ppm		
			6 7				0.0 ppm		
							0.0 ppm		
25	4	20'-22'	WH 2	6	50	25.0'-27.0': f. Sand and Silt, tr. f. Gravel	0.0 ppm		
			4 4				0.0 ppm		
							0.0 ppm		
30		25'-27'	WH 3	6	50		0.0 ppm		
			3 2						

Sample Types: S = Split Spoon: _____ T = Shelby Tube: _____
 R = Rock Core: _____ O = Macro-Core: _____
 N = ASTM D1586

Backfill Well Key
 Grout Native Fill
 Sand Bentonite

EPS of Vermont		Subsurface Log			Hole No.: RW-5	Date Started: 4/29/2009			
Client: Benchmark Mgt. Corp.		Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 4/29/2009		
Location: Colvin - Eggert Plaza		and 2" Nested Wells							
Project No.: B1585		Drilling Co.: Quality Inspection Services Incorporated		Driller: Ron Brown		Weather: mostly sunny			
P. Manager: S. Leitten		Geologist: Steve Leitten		D. Helper: Jim La Santa		60			
Drill Rig: Diedrich D-50 Turbo									
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'-.5': Asphalt and Sub base Gravel			
						0.5'-5.0': Black c. Sand, moist	0.0 ppm		
						5.0'-10.0': Red brown Silt and Clay, some Sand, little Gravel, moist	0.0 ppm		
10	1	5'-7'	3 5	10	90	5.0'-10.0': Red brown m. Sand, tr. Silt, moist	0.0 ppm		
			5 5				0.0 ppm		
						10.0'-15.0': Same as above but wet	0.0 ppm		
15	2	10'-12'	WH 1	1	60	15.0'-27.0': Red brown f/m Sand, tr. Silt, wet	0.0 ppm		
			WH WH				0.0 ppm		
							0.0 ppm		
20	3	15'-17'	WH 6	15	50		0.5 ppm		
			9 10				0.0 ppm		
							0.0 ppm		
25	4	20'-22'	WH 6	12	50		2.5 ppm		
			6 5				0.0 ppm		
30		25'-27'	WH 5	12	70		0.0 ppm		
			7 8						

Sample Types:

S = Split Spoon: _____

T = Shelby Tube: _____

R = Rock Core: _____

O = Macro-Core: _____

N = ASTM D1586

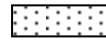
Backfill Well Key



Grout



Native Fill



Sand



Bentonite

EPS of Vermont		Subsurface Log				Hole No.: RW-6	Date Started: 4/22/2009		
Client: Benchmark Mgt. Corp.		Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 4/22/2009		
Location: Colvin - Eggert Plaza		and 2" Nested Wells							
Project No.: B1585 P. Manager: S. Leitten		Drilling Co.: Quality Inspection Services Incorporated		Driller: Ron Brown D. Helper: Jim La Santa		Weather: overcast			
		Geologist: Adam Morse		Drill Rig: Diedrich D-50 Turbo 40					
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'-.5': Asphalt and Sub base Gravel	0.0 ppm		
						0.5'-5.0': Gray organic Clay, moist	0.0 ppm		
						5.0'-10.0': Red brown Silt, some f. Sand, moist	0.0 ppm		
10	1	5'-7'	2 2	5	30	10.0'-20.0': Brown f. Sand, wet	0.0 ppm		
			3 4				0.0 ppm		
							0.0 ppm		
15	2	10'-12'	3 4	9	40	20.0'-27.0': Same as above but wet	0.0 ppm		
			5 5				0.0 ppm		
							0.0 ppm		
20	3	15'-17'	4 7	14	40	20.0'-27.0': Same as above but wet	0.0 ppm		
			7 8				0.0 ppm		
							0.0 ppm		
25	4	20'-22'	5 6	12	50	20.0'-27.0': Same as above but wet	0.0 ppm		
			6 7				0.0 ppm		
							0.0 ppm		
30		25'-27'	7 8	16	50	20.0'-27.0': Same as above but wet	0.0 ppm		
			8 9				0.0 ppm		
							0.0 ppm		

Sample Types:

S = Split Spoon: _____
R = Rock Core: _____

T = Shelby Tube: _____
O = Macro-Core: _____

N = ASTM D1586

Backfill Well Key

- Grout
- Native Fill
- Sand
- Bentonite

EPS of Vermont		Subsurface Log			Hole No.: RW-7	Date Started: 4/24/2009			
Client: Benchmark Mgt. Corp.		Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 4/24/2009		
Location: Colvin - Eggert Plaza		and 2" Nested Wells							
Project No.: B1585		Drilling Co.: Quality Inspection Services Incorporated		Driller: Ron Brown		Weather: sunny			
P. Manager: S. Leitten		Geologist: Steve Leitten		D. Helper: Jim La Santa		Drill Rig: Diedrich D-50 Turbo 50			
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'-.5': Asphalt and Sub base Gravel	0.2 ppm		
						0.5'-3.0': Black brown Gravel and Sand, moist	0.0 ppm		
						3.0'-12.0': Red brown Clay and Silt, little Sand and Gravel, moist	0.0 ppm		
10	1	5'-7'	3 3	8	75		0.0 ppm		
			5	7			0.0 ppm		
							0.0 ppm		
15	2	10'-12'	4 5	14	75	12.0'-15.0': Red brown Sand and Silt, wet	0.0 ppm		
			9	12			0.0 ppm		
						15.0'-25.0': Brown m. Sand, tr. Silt, wet	0.0 ppm		
20	3	15'-17'	9 10	23	75		6.8 ppm		
			13	15			0.0 ppm		
							0.0 ppm		
25	4	20'-22'	4 7	18	75	25.0'-27.0': Brown f. Sand, tr. Silt, wet	16.2 ppm		
			11	14			0.0 ppm		
							0.0 ppm		
30		25'-27'	WH 7	15	75		0.0 ppm		
			8	7					

Sample Types:

S = Split Spoon: _____

T = Shelby Tube: _____

R = Rock Core: _____

O = Macro-Core: _____

N = ASTM D1586

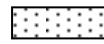
Backfill Well Key



Grout



Native Fill



Sand



Bentonite

EPS of Vermont		Subsurface Log			Hole No.: RW-8	Date Started: 4/21/2009			
Client: Benchmark Mgt. Corp.		Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 4/21/2009		
Location: Colvin - Eggert Plaza		and 2" Nested Wells							
Project No.: B1585		Drilling Co.: Quality Inspection Services Incorporated		Driller: Ron Brown		Weather: sunny			
P. Manager: S. Leitten		Geologist: Steve Leitten		D. Helper: Jim La Santa		Drill Rig: Diedrich D-50 Turbo 50			
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'-.5': Asphalt and Sub base Gravel	0.0 ppm		
						0.5'-5.0': Brown Silt, some Clay	0.0 ppm		
10	1	5'-7'	2 5	12	20	5.0'-10.0': Brown f. Sand, tr. Silt, moist	0.0 ppm		
			7 8				0.0 ppm		
15	2	10'-12'	2 2	7	60	10.0'-20.0': Same as above but wet	0.0 ppm		
			5 6				0.0 ppm		
20	3	15'-17'	4 4	9	40	20.0'-27.0': Same as above but saturated	0.0 ppm		
			5 7				0.0 ppm		
25	4	20'-22'	4 5	10	60		0.0 ppm		
			5 5				0.0 ppm		
30		25'-27'	5 5	10	70		0.0 ppm		
			5 7						

Sample Types:

S = Split Spoon: _____

T = Shelby Tube: _____

R = Rock Core: _____

O = Macro-Core: _____

N = ASTM D1586

Backfill Well Key



Grout



Native Fill



Sand



Bentonite

EPS of Vermont		Subsurface Log			Hole No.: RW-9	Date Started: 4/22/2009			
Client: Benchmark Mgt. Corp.		Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer				Sheet 1 of 1	Date Finished: 4/23/2009		
Location: Colvin - Eggert Plaza		and 2" Nested Wells							
Project No.: B1585		Drilling Co.: Quality Inspection Services Incorporated		Driller: Ron Brown		Weather: overcast			
P. Manager: S. Leitten		Geologist: Steve Leitten		D. Helper: Jim La Santa		40			
Drill Rig: Diedrich D-50 Turbo									
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'-.5': Asphalt and Sub base Gravel	0.0 ppm		
						0.5'-5.0': Brown Silt, some Clay, tr. f. Sand	0.0 ppm		
10	1	5'-7'	4 4	9	40	5.0'-10.0': Brown f. Sand, little. Silt, moist	0.0 ppm		
			5 6				0.0 ppm		
15	2	10'-12'	5 6	12	30	10.0'-15.0': Same as above but wet	0.0 ppm		
			6 8				0.0 ppm		
20	3	15'-17'	5 7	14	50	15.0'-27.0': same as above but saturated	0.0 ppm		
			7 10				0.0 ppm		
25	4	20'-22'	6 7	14	40		0.0 ppm		
			7 8				0.0 ppm		
30		25'-27'	5 8	15	60		0.0 ppm		
			7 7						

Sample Types:

S = Split Spoon: _____

R = Rock Core: _____

N = ASTM D1586

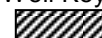
T = Shelby Tube: _____

O = Macro-Core: _____

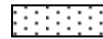
Backfill Well Key



Grout



Native Fill



Sand



Bentonite

EPS of Vermont		Subsurface Log			Hole No.: RW-10		Date Started: 4/24/2009		
Client: Benchmark Mgt. Corp.		Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer			Sheet 1 of 1		Date Finished: 4/24/2009		
Location: Colvin - Eggert Plaza		and 2" Nested Wells			Driller: Ron Brown		Weather: sun		
Project No.: B1585		Drilling Co.: Quality Inspection Services Incorporated			D. Helper: Jim La Santa		70		
P. Manager: S. Leitten		Geologist: Adam Morse			Drill Rig: Diedrich D-50 Turbo				
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'-.5': Asphalt and Sub base Gravel	0.0 ppm		
						0.5'-5.0': Brown Clay, some Silt, moist			
10	1	5'-7'	5 5	10	15	5.0'-10.0': Brown f. Sand, little. Silt, wet	0.0 ppm		
			5 6						
15	2	10'-12'	7 8	14	20	10.0'-15.0': Brown , f. Sand, little Silt, wet	0.0 ppm		
			6 8						
20	3	15'-17'	7 5	11	30	15.0'-20.0': Brown Silt, little f. Sand, wet	0.0 ppm		
			6 8						
25	4	20'-22'	6 5	13	60	20.0'-27.0': Brown f. Sand, little Silt, saturated	0.0 ppm		
			8 7						
30		25'-27'	8 8	17	20		0.0 ppm		
			9 10						

Sample Types:

S = Split Spoon: _____

R = Rock Core: _____

N = ASTM D1586

T = Shelby Tube: _____

O = Macro-Core: _____

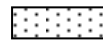
Backfill Well Key



Grout



Native Fill



Sand



Bentonite

EPS of Vermont		Subsurface Log		Hole No.: RW-11		Date Started: 4/28/2009			
Client: Benchmark Mgt. Corp.		Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer							
Location: Colvin - Eggert Plaza		and 2" Nested Wells							
Project No.: B1585		Drilling Co.: Quality Inspection Services Incorporated		Driller: Ron Brown		Weather: overcast			
P. Manager: S. Leitten		Geologist: Steve Leitten		D. Helper: Jim La Santa		70			
Drill Rig: Diedrich D-50 Turbo									
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'-.5': Asphalt and Sub base Gravel			
						0.5'-2.0': Gray Gravel and c. Sand, some Clay, moist	0.0 ppm		
						2.0'-5.0': Red brown Clay, tr. Sand and Gravel, moist	0.0 ppm		
						5.0'-10.0': Red brown Clay, tr. Silt and f. Sand, moist	0.0 ppm		
10	1	5'-7'	8 7		75		0.0 ppm		
			8 9				0.0 ppm		
						10.0'-15.0': Red brown Silt, some f. Sand, little Clay, moist	0.0 ppm		
							0.0 ppm		
15	2	10'-12'	5 2		75		0.0 ppm		
			5 5				0.0 ppm		
						15.0'-20.0': Brown m. Sand, tr. Silt, tr. fractured Limestone, wet	0.0 ppm		
							0.0 ppm		
20	3	15'-17'	34 36		30		0.0 ppm		
			19 17				0.9 ppm		
						20.0'-27.0': Brown f. Sand, tr. Silt, wet	0.0 ppm		
							0.0 ppm		
25	4	20'-22'	6 6		75		0.0 ppm		
			8 10				0.0 ppm		
							0.0 ppm		
							0.0 ppm		
30		25'-27'	WH 5		75		0.0 ppm		
			5 6						

Sample Types:

S = Split Spoon: _____

R = Rock Core: _____

N = ASTM D1586

T = Shelby Tube: _____

O = Macro-Core: _____

Backfill Well Key



Grout



Native Fill



Sand



Bentonite

EPS of Vermont		Subsurface Log			Hole No.: RW-12		Date Started: 4/28/2009		
Client: Benchmark Mgt. Corp.		Method of investigation: 6 1/4" HSA, 2" split spoon with auto hammer			Sheet 1 of 1		Date Finished: 4/28/2009		
Location: Colvin - Eggert Plaza		and 2" Nested Wells			Project No.: B1585		Drilling Co.: Quality Inspection Services Incorporated		
P. Manager: S. Leitten		Geologist: Steve Leitten			Driller: Ron Brown		Weather: overcast		
					D. Helper: Jim La Santa		70		
					Drill Rig: Diedrich D-50 Turbo				
Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5						0'-.5': Asphalt and Sub base Gravel			
						0.5'-2.0': Gray Gravel and c. Sand, some Clay, moist	0.0 ppm		
						2.0'-5.0': Red brown Clay, tr. Sand and Gravel, moist	0.0 ppm		
						5.0'-10.0': Red brown Clay, tr. Silt and f. Sand, moist	0.0 ppm		
10	1	5'-7'	8 7		75		0.0 ppm		
			8 9				0.0 ppm		
						10.0'-15.0': Red brown Silt, some f. Sand, little Clay, moist	0.0 ppm		
							0.0 ppm		
15	2	10'-12'	5 2		75		0.0 ppm		
			5 5				0.0 ppm		
						15.0'-20.0': Brown m. Sand, tr. Silt, tr. fractured Limestone, wet	0.0 ppm		
							0.0 ppm		
20	3	15'-17'	34 36		30		0.0 ppm		
			19 17				0.9 ppm		
						20.0'-27.0': Brown f. Sand, tr. Silt, wet	0.0 ppm		
							0.0 ppm		
25	4	20'-22'	6 6		75		0.0 ppm		
			8 10				0.0 ppm		
							0.0 ppm		
							0.0 ppm		
30		25'-27'	WH 5		75		0.0 ppm		
			5 6						

Sample Types:

S = Split Spoon: _____
 R = Rock Core: _____

T = Shelby Tube: _____
 O = Macro-Core: _____

N = ASTM D1586

Backfill Well Key

	Grout		Native Fill
	Sand		Bentonite

EPS of Vermont		Subsurface Log			Hole No.: MW-17S	Date Started: 3/3/2010		
Client: Benchmark Mgt. Corp.		Method of investigation: 4 1/4" HSA, 2" split spoon samples to target depth				Sheet 1 of 1	Date Finished: 3/3/2010	
Location: Colvin - Eggert Plaza		Project No.: B1585 P. Manager: Randy Klosko			Drilling Co.: QIS Geologist: A. Davenport	Driller: Ron Brown Driller Helper: Bob Craft Drill Rig: Dierich D-50 Turbo	Weather: sunny, 30s	
Depth (ft.)	Sample				Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"				
5	1	1.0'-2.0'			17%	0'-2': Asphalt and Sub-base Gravel (0.5'), re-worked silty brown clay and crusher run to 2', dry	0.1 ppm	water @ 14.0' no odors
			3,4					
	2	2.0'-4.0'	4,5		67%	2'-8': Red brown silty Clay, stiff, with gray and red silt lenses, tr. f. gravel, dry, Till	0.5 ppm	
		9,12						
10	3	4.0'-6.0'	4,6		67%	7'-7.5': Pocket of weathered gravel	0.3 ppm	
			8,12					
	4	6.0'-8.0'	8,11		75%	8'-10': Red brown silty Clay, tr. silt lenses @ 9.5', some vf Sand, moist, Till	0.6 ppm	
		13,13						
15	5	8.0'-10.0'	3,3		83%	10'-14': Red brown silty Clay, pockets of lt. brown/gray f. sand and silt, moist, Till	0.6 ppm	
			3,4					
	6	10.0'-12.0'	2,2		96%	14'-17.75': Red brown silty Clay, some vf sand, tr. f. sand and silt to ~17.75', wet, Till	0.7 ppm	
		2,3						
20	7	12.0'-14.0'	2,2		88%	17.75'-20': Red brown f/m Sand and tr. silt, wet, Till	0.6 ppm	
			2,3					
	8	14.0'-16.0'	3,2		100%	20'-24': Red brown vf Sand, some silt, wet, Till	0.3 ppm	
		2,2						
25	9	16.0'-18.0'	WOR, 1		83%	21.5'-23.5': Med. brown Sand, wet, Till	0.4 ppm	
			1,9					
	10	18.0'-20.0'	5,7		83%	23.5'-24': Red brown f/vf Sand and tr. silt, wet, Till	0.8 ppm	
		7,12						
30	11	20.0'-22.0'	9,10		75%	24'-26': Lense of red brown med. Sand, then red brown f/vf sand to 26', wet, Till	1.1 ppm	
			9,7					
	12	22.0'-24.0'	3,5		67%	0.5 ppm	1.0 ppm	
		8,8						
	13	24.0'-26.0'	3,4		75%			
			5,7					

Sample Types:

S = Split Spoon: _____

R = Rock Core: _____

N = ASTM D1586

T = Shelby Tube: _____

O = Macro-Core: _____

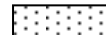
Backfill Well Key



Cement



Native Fill



Sand



Bentonite

Client: Benchmark Mgt. Corp.	Method of investigation: 4 1/4" HSA, 2" split spoon samples to target depth
Location: Colvin - Eggert Plaza	

Project No.: B1585	Drilling Co.: QIS	Driller: Ron Brown	Weather: partly sunny, 30s
P. Manager: Randy Klosko	Geologist: A. Davenport	Driller Helper: Bob Craft	
		Drill Rig: Dierich D-50 Turbo	


Depth (ft.)	Sample					Sample Description	Field Analytical Readings	Well Details	Groundwater and Other Observations
	No.	Depth (ft.)	Blows per 6"	"N"	Percent Recovery				
5	1	1.0'-2.0'	9,5		8%	0'-2': Asphalt and Sub-base Gravel, dry	0.5 ppm		
	2	2.0'-4.0'	5,7		4%	2'-6': Re-worked lt. brown Clay and Crusher Run, dry	0.2 ppm		
	3	4.0'-6.0'	5,6		13%		1.0 ppm		
10			9,11			6'-6.5": Lt. brown to red brown Silt, moist, Till	1.2 ppm		drilled through large gravel pocket which interfered w/sample recovery
	4	6.0'-8.0'	12,13		63%				
	5	8.0'-10.0'	5,3		0%	6.5'-8': Same as above with red/lt. brown silt lenses, moist, Till	N/A		
15			6,6						large rock prevented recovery
	6	10.0'-12.0'	2,3		83%	10'-12': Red brown stiff Clay with red/lt. brown silt lenses and lt. brown f. sand and gravel lenses, moist, Till	1.0 ppm		
	7	12.0'-14.0'	6,11		100%		0.8 ppm		
20	8	14.0'-16.0'	6,11		83%	12'-14': Red brown silty Clay, lenses of f. sand from 13-14', wet, Till	0.3 ppm		water @ 13.0' no odors
			13,15			14'-20': Medium red brown m. Sand, tr. f. sand and silt, wet, Till	0.6 ppm		
	9	16.0'-18.0'	12,13		100%		0.5 ppm		
25			15,17						
	10	18.0'-20.0'	2,7		100%				
			10,13						
30									

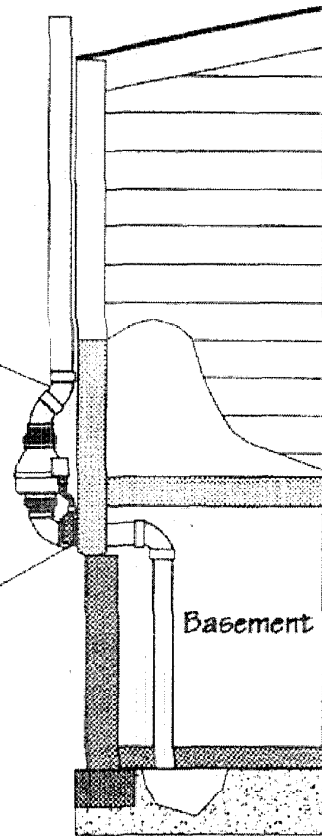
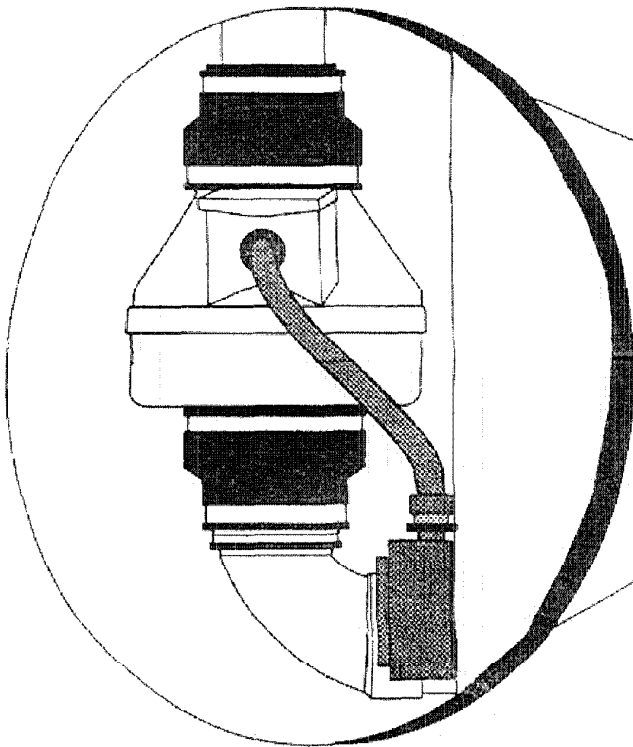
Sample Types: S = Split Spoon: _____ R = Rock Core: _____ N = ASTM D1586	T = Shelby Tube: _____ O = Macro-Core: _____ Backfill Well Key Cement Native Fill Sand Bentonite
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APPENDIX H:
SSDS BLOWER OWNER'S MANUAL

RP Series Installation Instructions

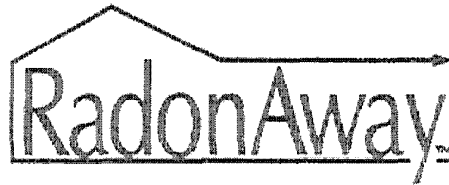
By


RadonAway™



Ward Hill, MA

P/N IN020 Rev D



RadonAway Ward Hill, MA.

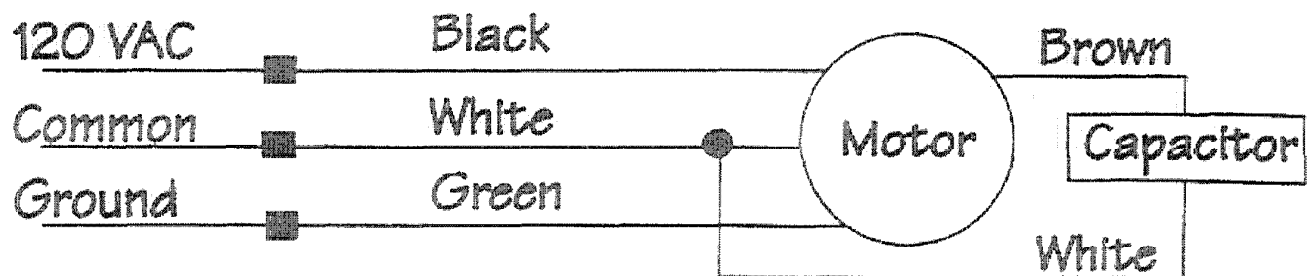
RP Series Fan Installation Instructions

Please Read and Save These Instructions.

DO NOT CONNECT POWER SUPPLY UNTIL FAN IS COMPLETELY INSTALLED. MAKE SURE ELECTRICAL SERVICE TO FAN IS LOCKED IN "OFF" POSITION. DISCONNECT POWER BEFORE SERVICING FAN.

1. **WARNING!** Do not use fan in hazardous environments where fan electrical system could provide ignition to combustible or flammable materials.
2. **WARNING!** Do not use fan to pump explosive or corrosive gases.
3. **WARNING!** Check voltage at the fan to insure it corresponds with nameplate.
4. **WARNING!** Normal operation of this device may affect the combustion airflow needed for safe operation of fuel burning equipment. Check for possible backdraft conditions on all combustion devices after installation.
5. **NOTICE!** There are no user serviceable parts located inside the fan unit. Do **NOT** attempt to open. Return unit to the factory for service.
6. All wiring must be in accordance with local and national electrical codes.

DynaVac RP Series Fan Wiring Diagram



RP SERIES PRODUCT SPECIFICATIONS

The following chart shows fan performance for the RP Series Fan:

Typical CFM Vs Static Suction "WC									
	0"	.25"	.5"	.75"	1.0"	1.25"	1.5"	1.75"	2.0"
RP140	134	101	68	10	-	-	-	-	-
RP145	173	152	132	115	94	73	55	37	-
RP155	185	161	137	115	94	73	55	37	-
RP260	275	225	180	140	105	70	20	-	-
RP265	327	302	260	230	207	176	139	101	57

Power Consumption @ 120 VAC	Maximum Recommended Operating Pressure [†] (Sea Level Operation)**
RP140	14 - 20 watts
RP145	37 - 71 watts
RP155	37 - 75 watts
RP260	52 - 72 watts
RP265	86 - 140 watts

†Reduce by 10% for High Temperature Operation

***Reduce by 4% per 1000 feet of altitude*

	Size	Weight	Inlet/Outlet
RP140	8.5H" x 9.7" Dia.	5.5 lbs.	4.5" OD (4.0" PVC Sched 40 size compatible)
RP145	8.5H" x 9.7" Dia.	5.5 lbs.	4.5" OD (4.0" PVC Sched 40 size compatible)
RP155	8.5H" x 9.7" Dia.	5.5 lbs.	5.0" OD
RP260	8.6H" x 11.75" Dia.	5.5 lbs.	6.0" OD
RP265	8.6H" x 11.75" Dia.	6.5 lbs.	6.0" OD

Recommended ducting: 3" or 4" Schedule 20/40 PVC Pipe

Mounting: Mount on the duct pipe or with optional mounting bracket.

Storage temperature range: 32 - 100 degrees F.

Normal operating temperature range: -20 - 120 degrees F.

Maximum inlet air temperature: 80 degrees F.

Continuous Duty

Class B Insulation

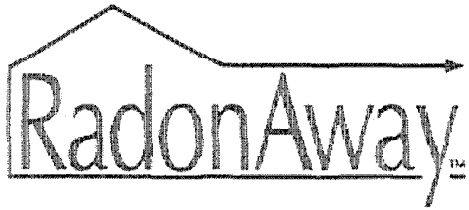
Thermally protected

3000 RPM

Rated for Indoor or Outdoor Use



77728



INSTALLATION INSTRUCTION IN020 Rev D

DynaVac - RP Series	
RP140	p/n 23029-1
RP145	p/n 23030-1
RP155	p/n 23031-1
RP260	p/n 23032-1
RP265	p/n 23033-1

1.0 SYSTEM DESIGN CONSIDERATIONS

1.1 INTRODUCTION

The DynaVac RP Series Radon Fans are intended for use by trained, professional Radon mitigators. The purpose of this instruction is to provide additional guidance for the most effective use of a DynaVac Fan. This instruction should be considered as a supplement to EPA standard practices, state and local building codes and state regulations. In the event of a conflict, those codes, practices and regulations take precedence over this instruction.

1.2 ENVIRONMENTALS

The RP Series Fans are designed to perform year-round in all but the harshest climates without additional concern for temperature or weather. For installations in an area of severe cold weather, please contact RadonAway for assistance. When not in operation, the fan should be stored in an area where the temperature is never less than 32 degrees F. or more than 100 degrees F.

1.3 ACOUSTICS

The RP Series Fan, when installed properly, operates with little or no noticeable noise to the building occupants. The velocity of the outgoing air should be considered in the overall system design. In some cases the "rushing" sound of the outlet air may be disturbing. In these instances, the use of a RadonAway Exhaust Muffler is recommended.

1.4 GROUND WATER

In the event that a temporary high water table results in water at or above slab level, water may be drawn into the riser pipes thus blocking air flow to the RP Series Fan. The lack of cooling air may result in the fan cycling on and off as the internal temperature rises above the thermal cutoff and falls upon shutoff. Should this condition arise, it is recommended that the fan be turned off until the water recedes allowing for return to normal operation.

1.5 SLAB COVERAGE

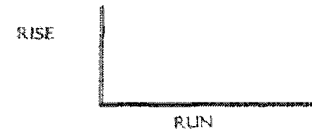
The RP Series Fan can provide coverage up to 2000+ sq. ft. per slab penetration. This will primarily depend on the sub-slab material in any particular installation. In general, the tighter the material, the smaller the area covered per penetration. Appropriate selection of the RP Series Fan best suited for the sub-slab material can improve the slab coverage. The RP140/145/155 are best suited for general purpose use. The RP260 can be used where additional airflow is required and the RP265 is best suited for large slab, high airflow applications. Additional suction points can be added as required. It is recommended that a small pit (5 to 10 gallons in size) be created below the slab at each suction hole.

1.6 CONDENSATION & DRAINAGE

Condensation is formed in the piping of a mitigation system when the air in the piping is chilled below its dew point. This can occur at points where the system piping goes through unheated space such as an attic, garage or outside. The system design must provide a means for water to drain back to a slab hole to remove the condensation. The RP Series Fan **MUST** be mounted vertically plumb and level, with the outlet pointing up for proper drainage through the fan. Avoid mounting the fan in any orientation that will allow water to accumulate inside the fan housing. The RP Series Fans are **NOT** suitable for underground burial.

For RP Series Fan piping, the following table provides the minimum recommended pipe diameter and pitch under several system conditions.

Pipe Dia.	Minimum Rise per Foot of Run*		
	@25 CFM	@50 CFM	@100 CFM
4"	1/8"	1/4"	3/8"
3"	1/4"	3/8"	1 1/2"



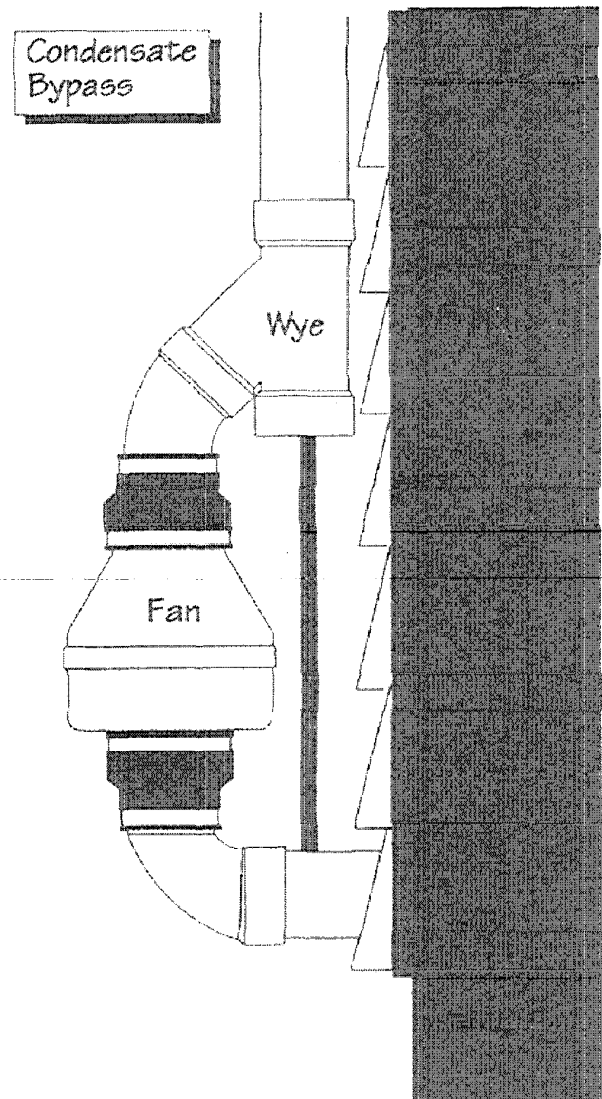
*Typical RP Series Fan operational flow rate is 25 - 90 CFM.
(For more precision, determine flow rate by using the chart in the addendum.)

Under some circumstances in an outdoor installation a condensate bypass should be installed in the outlet ducting as shown. This may be particularly true in cold climate installations which require long lengths of outlet ducting or where the outlet ducting is likely to produce large amounts of condensation because of high soil moisture or outlet duct material. Schedule 20 piping and other thin-walled plastic ducting and Aluminum downspout will normally produce much more condensation than Schedule 40 piping.

The bypass is constructed with a 45 degree Wye fitting at the bottom of the outlet stack. The bottom of the Wye is capped and fitted with a tube that connects to the inlet piping or other drain. The condensation produced in the outlet stack is collected in the Wye fitting and drained through the bypass tube. The bypass tubing may be insulated to prevent freezing.

1.7 "SYSTEM ON" INDICATOR

A properly designed system should incorporate a "System On" Indicator for affirmation of system operation. A manometer, such as a U-Tube, or a vacuum alarm is recommended for this purpose.



The RP Series Fans operate on standard 120V 60 Hz. AC. All wiring must be performed in accordance with the National Electrical Code and state and local building codes. All electrical work should be performed by a qualified electrician. Outdoor installations require the use of a U.L. listed watertight conduit.

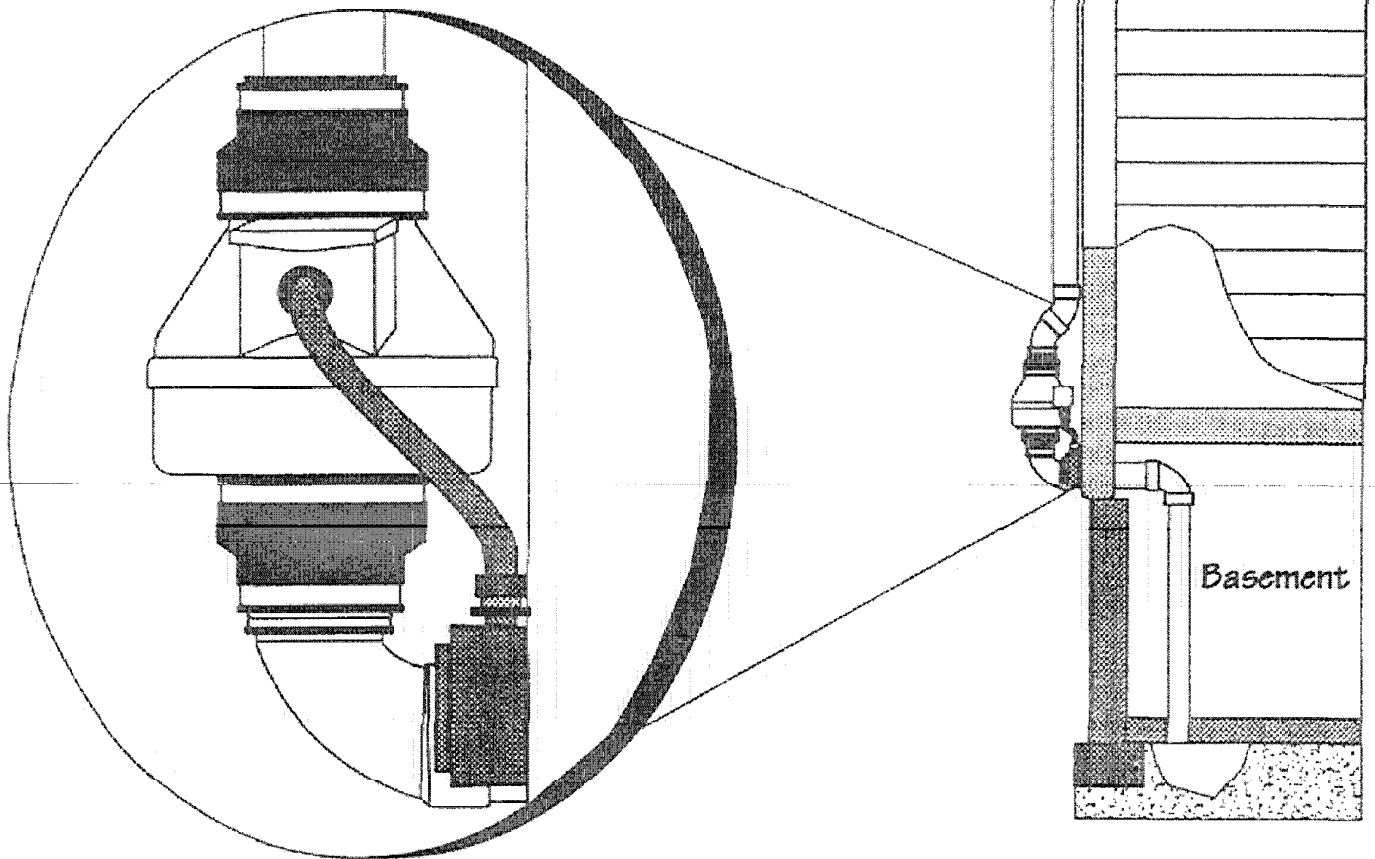
1.9 SPEED CONTROLS

The RP Series Fans are rated for use with electronic speed controls, however, they are generally not recommended.

2.0 INSTALLATION

The RP Series Fan can be mounted indoors or outdoors. (It is suggested that EPA recommendations be followed in choosing the fan location.) The RP Series Fan may be mounted directly on the system piping or fastened to a supporting structure by means of optional mounting bracket.

Typical Outdoor Installation



2.1 MOUNTING

Mount the RP Series Fan vertically with outlet up. Insure the unit is plumb and level. When mounting directly on the system piping assure that the fan does not contact any building surface to avoid vibration noise.

2.2 MOUNTING BRACKET (optional)

The RP Series fan may be optionally secured with the RadonAway P/N 25007-2 mounting bracket. Foam or rubber grommets may also be used between the bracket and mounting surface for vibration isolation.

2.3 SYSTEM PIPING

Complete piping run, using flexible couplings as means of disconnect for servicing the unit and vibration isolation.

2.4 ELECTRICAL CONNECTION

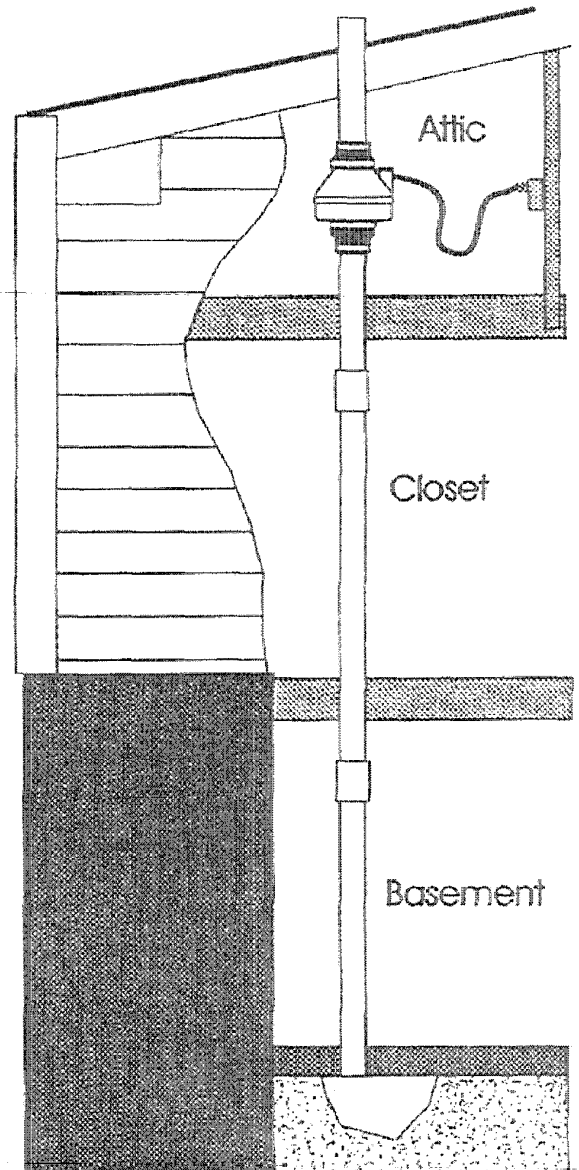
Connect wiring with wire nuts provided, observing proper connections:

Fan Wire	Connection
Green	Ground
Black	AC Hot
White	AC Common

2.5 VENT MUFFLER (optional)

Install the muffler assembly in the selected location in the outlet ducting. Solvent weld all connections. The muffler is normally installed at the end of the vent pipe.

Typical Indoor Installation



2.6 OPERATION CHECKS

- ___ Verify all connections are tight and leak-free.
- ___ Insure the RP Series Fan and all ducting is secure and vibration-free.
- ___ Verify system vacuum pressure with manometer. Insure vacuum pressure is less than maximum recommended operating pressure
(Based on sea-level operation, at higher altitudes reduce by about 4% per 1000 Feet.)
(Further reduce Maximum Operating Pressure by 10% for High Temperature environments)
See Product Specifications. If this is exceeded, increase the number of suction points.
- ___ Verify Radon levels by testing to EPA protocol.

IMPORTANT INSTRUCTIONS TO INSTALLER

Inspect the GP/XP/XR/RP Series Fan for shipping damage within 15 days of receipt. Notify RadonAway of any damages immediately. RadonAway is not responsible for damages incurred during shipping. However, for your benefit, RadonAway does insure shipments.

There are no user serviceable parts inside the fan. **Do not attempt to open.** Return unit to the factory for service.

Install the GP/XP/XR/RP Series Fan in accordance with all EPA standard practices, and state and local building codes and state regulations.

WARRANTY

Subject to applicable consumer protection legislation, RadonAway warrants that the GP/XP/XR/RP Series Fan will be free from defective materials and workmanship for the period of five (5) years from the date of purchase.

During the first three (3) years RadonAway will replace any product which fails due to defects in material or workmanship

In years four (4) and five (5) RadonAway will at its option, factory recondition or replace any product which fails due to defects in material or workmanship.

Warranty is contingent on installation in accordance with the instructions provided. This warranty does not apply where repairs or alterations have been made or attempted by others; or the unit has been abused or misused. Warranty does not include damage in shipment unless the damage is due to the negligence of RadonAway. All other warranties, expressed or written, are not valid. To make a claim under these limited warranties, you must return the defective item to RadonAway. RadonAway is not responsible for installation or removal cost associated with this warranty. In no case is RadonAway liable beyond repair or replacement of the defective product FOB RadonAway

THERE ARE NO WARRANTIES WHICH EXTEND BEYOND THE DESCRIPTION ON THE FACE HEREOF. THERE IS NO WARRANTY OF MERCHANTABILITY. ALL OTHER WARRANTIES, EXPRESSED OR WRITTEN, ARE NOT VALID.

For service under these warranties, contact RadonAway for a Return Material Authorization (RMA) number and shipping information. No returns can be accepted without an RMA. If factory return is required, the customer assumes all shipping costs to and from factory.

Record the following for your records:

Serial No. _____ Receipt Date _____

APPENDIX I:
RELEVANT CONTACTS

Relevant Project Contacts

Dept.	Contact	Phone
NYSDEC	Regional Remediation Engineer	716-851-7220
New York State Department of Health	Secretary to the Commissioner	518-474-2011
Erie County	Executive's Office	716-858-8500
Town of Tonawanda	Town Supervisor	716-877-8804