

PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

FOR

5565 RIVER ROAD *37 ACRES*
TOWN OF TONAWANDA
ERIE COUNTY, NEW YORK 14150

Prepared for:



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September 2009

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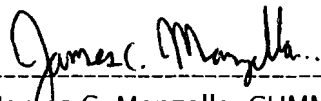
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ENVIRONMENTAL PROFESSIONAL STATEMENT

This Phase I Environmental Site Assessment (ESA) was performed by a qualified scientist(s) and/or engineer(s) employed by TVGA Consultants (TVGA). The individuals responsible for the preparation of this report are identified below, and resumes for these Environmental Professionals are on file at TVGA, and are available upon request.

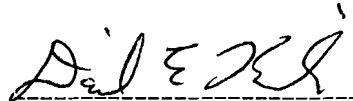
We declare that, to the best of our professional knowledge and belief, we meet the definition of *Environmental professional* as defined in §312.10 of 40CFR Part 312. We have the specific qualifications based on education, training, and experience to assess a *property* of the nature, history, and setting of the subject *property*. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

ESA Performed By:



James C. Manzella, CHMM
Project Scientist

ESA Reviewed By:



Daniel E. Riker, P.G.
Project Manager

1.0 INTRODUCTION

TVGA Consultants (TVGA) was retained by the Town of Tonawanda to perform a Phase I Environmental Site Assessment (ESA) of the property located at 5565 River Road, in the Town of Tonawanda, New York (see Figure 1). The purpose of this ESA is to identify recognized environmental conditions, as defined by *American Society for Testing and Materials* (ASTM) Practice E 1527-05, in order to locate and further define the areas of environmental concern that may be subject to future site investigation activities.

The term "recognized environmental conditions" is defined by ASTM as the presence or likely presence of any hazardous substance or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater or surface water of the property. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment, and that generally would not be the subject of an enforcement action if brought to the attention of the appropriate regulatory agencies.

This Phase I ESA Report has been prepared to:

- Provide a general description of the subject property, and vicinity;
- Discuss the current and historical usage of the property and surrounding area;
- Identify the presence or absence of recognized environmental conditions in connection with the subject property based upon the results of a historical and regulatory records review, interviews, and a site reconnaissance; and
- Define areas of potential environmental concern warranting further investigation.

2.0 SCOPE OF WORK

The Phase I Environmental Site Assessment Report relates the findings with respect to:

- Records Review
- Site Reconnaissance
- Interviews

Limitations and exceptions associated with the performance of this Phase I Environmental Site Assessment are presented at the end of this report. A checklist for compliance with ASTM Practice E 1527-05 is included as Appendix A.

2.3 Interviews

Reasonable attempts were made to conduct interviews with former employees, neighboring property owners, and local government officials for the purpose of obtaining information indicating recognized environmental conditions in connection with the subject property. A summary of the interviews is included in Section 6.2.

2.4 Report

This report includes the necessary documentation to support the findings and conclusions listed in Section 8.0. It summarizes the records and historical use review, the site reconnaissance, and the results of interviews. The report also documents each source used, even if the source revealed no findings, to facilitate reconstruction of the research at a later date, if necessary. Additionally, this report describes any missing information that was not readily obtainable and discusses the implications of these data gaps.

2.5 Additional Services

The scope of this Phase I ESA, as outlined in the preceding subsections, was developed in accordance with ASTM Practice E 1527-05. No additional services beyond that specified in ASTM Practice E 1527-05 were provided. More specifically, this ESA did not include sampling or analysis of potential lead-based paint or asbestos-containing materials, or the collection and analysis of environmental samples, for the purpose of characterizing physical or chemical conditions on or within the subsurface of the subject property.

3.0 SITE DESCRIPTION

This section briefly describes the subject property, as well as the general location and description of the property. The subject property is then defined through the use of common physical setting sources and a description of neighboring properties.

3.1 Location and Description

The subject property is located south of River Road in the Town of Tonawanda, Erie County, New York (Figure 1). The property is landlocked and approximately 900 feet south of River Road. The subject property, which is rectangular in shape, consists of one parcel that is approximately 37 acres in size. The property is zoned industrial and is currently vacant and undeveloped. The subject property has a section, block and lot number (SBL) of 52.06-3-8 assigned to it by the Town of Tonawanda Assessor (Figure 2).

3.2 Physical Setting Sources

3.2.1 Topography

A USGS 7.5 Minute Topographic Map is included as Figure 1. The topography of the subject property is generally flat with an approximate elevation of 600 feet above mean sea level (AMSL) based upon USGS topographic mapping of the area.

3.2.2 Site Geology and Hydrology

The *Soil Survey of Erie County* indicates that approximately 50% of subject property, primarily the northern portion of the property, is comprised of "Dump." These dump areas typically consist mostly of excavations that are filled with rubbish and debris. The refuse is covered, partially covered, or mixed with earth material. The depth of the refuse and amount of soil covering are quite variable. The northern portion of the subject property is comprised of Wayland silt loam. The southern portion of the subject property is comprised of Cayuga silt loam and Churchville silt loam. The *Surficial Geologic Map of New York, Niagara Sheet* depicts the subject property as being underlain by lacustrine silt and clay of variable thickness up to 330 feet. The *Geologic Map of New York, Niagara Sheet* indicates that the uppermost bedrock formation beneath the subject property consists of Camillus, Syracuse and Vernon formations of the Akron Dolostone and Salina groups with thickness ranging from 400 to 700 feet.

A Flood Insurance Rate Map of the area indicates that the subject property is not within the boundaries of the 100- and/or 500-year floodplains.

The direction of groundwater flow is not well defined, but fundamental hydrogeologic principles suggest that groundwater flow is likely to be to the north towards the Niagara River. However, localized variations in groundwater flow direction may occur in the vicinity of utility lines or other undefined subsurface features.

The New York State Department of Environmental Conservation (NYSDEC) Freshwater Wetland Map and the U.S. Department of Interior Fish and Wildlife Service National Wetlands Inventory Map for the Tonawanda West, New York Quadrangles were reviewed. These maps indicate that no state designated wetland areas are located on or adjoining the subject property. However, a federally designated wetland area is located on the subject property, in the vicinity of the unnamed tributary to Two Mile Creek that transects the northern portion of subject property.

3.3 Neighboring Properties

Land use in the vicinity of the subject property is characterized as a mixture of industrial and commercial uses. The majority of the adjoining property to the west is vacant and undeveloped and consists of a mixture of forested land, overgrown grass and shrubs. A small steel-sided structure is located at the north end of this property along River Road. The adjoining property to the north is occupied by R&L Carriers, a trucking depot for lighter-than-truckload freight and the adjoining property to the south is occupied by a crude oil pipeline pumping station operated by Enbridge Energy Inc. Adjoining the subject property to the east is a sewer main for the Town of Tonawanda.

4.0 HISTORICAL RECORDS REVIEW

This section of the report details historical information from typical sources, as well as sources that may be unique to this subject property.

4.1 Aerial Photographs

Aerial photographs of the subject property and surrounding properties were obtained from an environmental database service company, Environmental Data Resources, Inc. (EDR) and the Erie County Department of Public Works website. The aerial photographs for the years 1927, 1951, 1959, 1966, 1978, 1983, 1985, 1995, and 2006 were reviewed during this Phase I ESA. Aerial photographs often provide information concerning the history of development of the subject property and surrounding area. Copies of the aerial photographs are provided in Appendix B.

The 1927 photograph depicted the subject property as vacant and undeveloped shrub and forested land. A disturbed area was visible along the western boundary of the subject property and is likely the pipeline that is currently located along this property line. Two creek swales appear to transect the subject property, one in the northern portion of the property and one near the center of the property. Adjoining properties consisted of a mixture of vacant and undeveloped agricultural and forested land.

The 1951 aerial photograph is similar to the earlier photograph. However, the adjoining property to the northwest is now developed with tanks. Remaining adjoining properties are similar to the earlier photograph.

The 1959 aerial photograph is similar to the earlier photograph. Adjoining properties are similar to the earlier photograph.

The 1966 aerial photograph is similar to the earlier photograph; however several apparent areas of disturbance appear on the subject property, and these areas may be associated with the dump area discussed in Section 3.2.2. The adjoining property to the east appears to be developed as a park. The remaining adjoining properties are similar to the earlier photograph.

The 1978 aerial photograph is similar to the earlier photograph; however the disturbed dumping area appears larger in this photograph than in the 1966 photograph. The adjoining property to the north appears developed with a trucking facility. Remaining adjoining properties are similar to the earlier photograph.

The 1983, 1985 and 1995 aerial photographs are similar to the 1978 photograph.

The 2006 aerial photograph depicts the subject property as mostly forested, with the exception of several cleared areas. Adjoining properties are similar to the 1995 photograph.

4.2 Fire Insurance Maps\Historical Atlases

Fire insurance maps typically were produced for commercial, industrial, and residential properties that would have been underwritten by insurance companies. Sanborn fire insurance maps were ordered from EDR; however, Sanborn maps were not available for the portion of the Town of Tonawanda in which the subject property is located. A copy of the EDR Sanborn search report is included in Appendix C.

5.0 RECORDS REVIEW

The records review section presents information collected from local agencies, followed by information from state and federal sources.

5.1 Local Records

The following local public offices were visited or contacted:

- Town of Tonawanda Assessor's Office
- Town of Tonawanda Building Department
- Town of Tonawanda Fire Department

5.1.1 Town of Tonawanda Assessor's Office

The Town of Tonawanda Assessor's Office was visited regarding the subject property. Current and historical property cards were provided for the subject property. The property cards revealed that the property contains a billboard but is otherwise vacant. The property cards indicate that the owner of the property is D.F. Magliarditti, who has owned the property since 1994. Copies of the property cards are included in Appendix D.

5.1.2 Town of Tonawanda Building Department

The Town of Tonawanda Building Department was visited regarding the subject property; however, no records were found for the subject property.

5.1.3 Town of Tonawanda Fire Department

The Town of Tonawanda Fire Department, which maintains records of tanks and spills within the Town, was visited regarding the subject property. No records were found for the subject property.

5.2 State and Federal Records

An environmental database service company, Environmental Data Resources, Inc. (EDR), was contracted to provide a site-specific environmental database search report for the subject property and vicinity. The EDR Environmental Site Assessment Report is included as Appendix E and is summarized in the following subsections.

5.2.1 Inactive, Uncontrolled or Abandoned Hazardous Waste Sites

No National Priority List (NPL) Sites were identified on the subject property or within a one-mile radius of the subject property.

No New York State Department of Environmental Conservation (NYSDEC) Inactive Hazardous Waste Sites (SHWSs) were identified on the subject property. However, two SHWSs are located within a one-mile radius of the subject property. The Ashland Site, located at 4625 River Road, approximately 0.6 mile southwest of the subject property, is a former in-ground product storage tank used to store crude oil within the United Refining Facility. This site is designated as Class 3 by the NYSDEC. Class 3 sites do not present a significant threat to public health or the environment and action may be deferred. The Niagara Mohawk-Cherry Farm site, a NYSDEC Class 4 site, is an inactive landfill located approximately 0.5 mile southwest of the subject property. Class 4 sites have been properly closed and require continued management. Based upon the regulatory status of these sites,

they do not appear to represent any significant risks to the environmental integrity of the subject property.

The USEPA Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) database was reviewed and did not indicate the presence of any CERCLIS sites on the subject property. However, two CERCLIS sites were located within one-half mile of the subject property. The Seaway Industrial Waste Disposal Site is located 0.5 mile west of the subject property and Ashland I is located 0.8 mile west of the subject property. Based on the remedial status and/or separation distance from the subject property, these sites are not likely to pose threats to environmental integrity of the subject property.

No CERCLIS archived sites or CERCLIS No Further Remedial Action Planned (NFRAP) sites were identified on the subject property. However, one CERCLIS NFRAP site was identified within 0.5 mile of the subject property. Consolidated Freight-Tonawanda is located 0.05 mile east of the subject property. Based on the remedial status of the site, it is not likely to be an environmental threat to the subject property.

5.2.2 State Listed Brownfield Sites

No New York State Brownfield sites were identified on the subject property. However, one NYS Brownfield Site was listed within a one-half mile radius of the subject property. The Erie Petro Transfer Site is located at 5335 River Road, 0.06 mile west of the subject property. The site is a 25-acre former petroleum tank farm. The EDR report indicated that one 5,000,000-gallon abandoned derelict aboveground storage tank remains on site. This site is currently under investigation by the NYSDEC. TVGA contacted the NYSDEC who indicated that this tank had not been in use since the early 1990s and was demolished and removed from the site in July 2009. The NYSDEC indicated that the subsurface investigation of this site has revealed petroleum contamination in the subsurface soil; however, due to the low permeability of the soil on this site, petroleum contamination is localized. Additionally, the investigation of groundwater at this site did not reveal any significant contamination. Lastly, the NYSDEC indicated that they are in the process of removing the grossly contaminated petroleum impacted soil from this site. Based on the currently remedial status and its hydrogeologic position cross-gradient of the subject property, this site is not likely to represent a threat to the environmental integrity of the subject property.

5.2.3 Institutional/Engineering Control Sites

The subject property is not listed on the federal or NYSDEC registry of institutional and/or engineering control sites.

5.2.4 State Voluntary Cleanup Sites

The subject property is not listed on the NYSDEC list of sites that participate in the state Voluntary Cleanup Program (VCP). Additionally, no VCP sites were found within a one-half mile radius of the subject property.

5.2.5 Active Solid Waste Sites

No New York State Solid Waste Facilities/Landfill (SWF/LF) sites were identified on or adjoining the subject property. Additionally, no SWF/LF sites are located within a one-half mile radius of the subject property.

5.2.6 Hazardous Waste Treatment, Storage and Disposal Facilities

Review of the RCRA Treatment, Storage, and Disposal Facilities (TSDF) Report indicated that no such facilities exist on or within a one-half mile radius of the subject property.

5.2.7 Hazardous Waste Generators

Neither the subject property nor adjoining properties is currently listed on the USEPA Resource Conservation and Recovery Act Information System (RCRAInfo) list of small and/or large quantity hazardous waste generators.

The RCRA Administrative Action Tracking System (RAATS), RCRIS Corrective Action Sites (CORRACTS) Database, and USEPA Civil Enforcement Docket (DOCKET) contain additional information on RCRA enforcement actions. The subject property was not identified on any of these databases.

The facility Index System/Facility Identification Initiative Program Summary Report (FINDS) provides both facility information and links to State and Federal Databases including: Permit Compliance System (PCS); Aerometric Information Retrieval System (AIRS); USEPA Civil Enforcement Docket (DOCKET); Criminal Docket System (C-DOCKET); Federal Underground Injection Control (FURS); Federal Facilities Information System (FFIS); State Environmental Laws and Statutes (STATE); and PCB Activity Data System (PADS). The subject property is not listed on the FINDS database. However, the adjoining properties to the west, 5335 River Road and Co Steel Recycling, are listed in the FINDS database. No environmental concerns were identified in association with the listing of these sites on this database.

5.2.8 Toxic Waste Generators

The PCB Activity Database System (PADS) contains information on facilities that handle PCBs and file EPA Form 7710-53. Neither the subject property nor properties within a 0.25-mile radius were identified on the PADS database.

The Toxic Release Inventory System (TRIS) contains information on facilities that manufacture, process, or import any of the listed toxic chemicals. Neither the subject property nor any properties within 0.25-mile of the subject property are not on the TRIS database.

The USEPA Section Seven Tracking System (SSTS) tracks the registration of pesticide-producing establishments. No SSTS facilities are located on or within a 0.25 mile radius of the subject property.

The Toxic Substance Control Act (TSCA) information is no longer released to the public by the USEPA. No TSCA sites were identified on or within 0.25 mile of the subject property.

5.2.9 Petroleum and Chemical Storage Tanks/Facilities

Neither the subject property nor any adjoining properties appear on the New York State Petroleum Bulk Storage (PBS) list as being a registered PBS facility.

The New York State Chemical Bulk Storage (CBS) registrant listing for New York State did not identify registered CBS facilities on the subject property or adjoining properties.

No Leaking Storage Tank Incident Report (LTANK) sites were identified on the subject property according to the EDR report. However, four LTANK sites were identified in the EDR report within a one-half mile radius of the subject property. All of these LTANK sites have been closed and the EDR report indicated that NYSDEC cleanup standards have been met. Therefore, these sites are not considered to represent environmental threats to the subject property.

A review of the New York State Major Oil Storage Facilities (MOSF) database by EDR did not indicate any MOSFs within the subject property. However, one MOSF site, Coastal Oil New York, Inc, is located at 5335 River Road 0.06 mile west of the subject property. This site is discussed as the Erie Petro Transfer Site in Section 5.2.2, which concludes this site is not likely to represent a threat to the environmental integrity of the subject property.

5.2.10 Hazardous Substance and Petroleum Releases

A review of the Emergency Response Notification System (ERNS) by EDR did not indicate any ERNS sites on the subject property or adjoining properties.

The NYSDEC Division of Environmental Remediation maintains files on petroleum and chemical spills in New York. The NYSDEC maintains an "open-spill file" until contamination is satisfactorily addressed to the NYSDEC standard at which time the spill file is closed but remains on the list of spill sites. The subject property is not listed on the New York Spills Report Database. However, thirty-two sites within a 0.5-mile radius of the subject property are listed in the New York Spills Report Database. Thirty of these sites are listed as being closed and NYSDEC cleanup standards as being met and are therefore not likely to pose an environmental concern to the subject property. Two sites, the Former MOSF Facility site, located 0.05 mile west of the subject property, and the Pipeline Site, located 0.2 mile north of the subject property, were noted as sites at which NYSDEC cleanup standards were not met. The Former MOSF Facility site is discussed in Section 5.2.2, which concludes that the site does not pose a threat to the environmental integrity of the subject property. The Pipeline site is currently under investigation by the NYSDEC. The portion of the pipeline near which contamination was found is 0.2 mile north of the subject property, across River Road. Based on the separation distance and the hydrogeological position downgradient from the subject property, this site is not likely to pose an environmental concern relative to the subject property.

5.2.11 Formerly Utilized Sites Remedial Action Program Sites

The Formerly Utilized Sites Remedial Action Program (FUSRAP) was initiated by the Atomic Energy Commission in 1974 to identify and cleanup contaminated sites used in the early years of the nation's atomic energy program. One FUSRAP site was identified on the subject property (Rattlesnake Creek) and three FUSRAP sites were identified within 0.5 mile of the subject property (i.e., the Seaway Site Ashland 1 and Ashland 2). The locations of the Ashland 1, 2 and Rattlesnake Creek sites are depicted on Figure 2 of the *Site Closeout Report for the Ashland 1 (including Seaway Area D), Ashland 2 and Rattlesnake Creek FUSRAP Sites*, October 2006, which is included as Appendix F. Based on a review of this report, the Ashland 1 (including Seaway Area D), Ashland 2 and Rattlesnake Creek FUSRAP sites have been successfully remediated under the FUSRAP by the US Army Corps of Engineers (USACOE) in early 2006. This report also summarizes the types of contamination formerly present at these sites as well as the types and quantity of contaminated materials removed. Based on the current remedial status of these sites, they do not pose environmental threats to the subject property.

The Seaway Site, a closed landfill also known as the Niagara Landfill, is located approximately 0.2 miles west of the subject property and is a FUSRAP site. This site is currently subject to quarterly groundwater monitoring which is overseen by the NYSDEC. Included in Appendix F is a Fact Sheet and Frequently Asked Questions sheet prepared by the USACOE for this site. Based on the information provided in these documents as well as the fact that quarterly monitoring is conducted at this site, no significant environmental threats to the subject property are expected from this site.

5.2.12 FOIL Requests

A FOIL request was sent to the NYSDEC for information on any current or past environmental violations associated with the subject property and surrounding properties, the registration of any USTs/ASTs and the generation, treatment, storage, or disposal of hazardous wastes. Appendix F contains the FOIL requests and correspondence received to date.

5.2.13 Environmental Lien Search

NERT Real Estate an Information was contracted to provide an environmental lien search report for the subject property. The NERT Environmental Lien Search Report is included as Appendix G. The lien search did not identify any environmental liens associated with the subject property.

6.0 SITE RECONNAISSANCE AND INTERVIEWS

This section presents general observations identified during the site reconnaissance of the subject property conducted by personnel from TVGA on August 20, 2009. Additionally, specific observations relative to the presence or absence of recognized environmental conditions and/or other areas of potential environmental concerns are provided herein. Lastly, information obtained as a result of interviews is described in this section. It should be noted that the southern third of the property was heavily vegetated with low-lying brush, trees and shrubs, which limited the visual assessment of this portion of the property.

6.1 Site Reconnaissance

6.1.1 Site Visit

The subject property is comprised of approximately 3.7 acres of undeveloped vacant land and is rectangular in shape. The property occupied by a mixture of wooded land, overgrown grass, and scrub brush and shrubs. As stated above the southern third of the property was most heavily vegetated. The majority of the property is generally flat with a few exceptions. The center of the property gently slopes towards an unnamed creek that traverses the property from east to

west. Also, a number of large mounds upon which with mature trees were growing were observed on the northern half of the property. These mounds range in size from approximately 200 square feet to more than 2,000 square feet in size and range in height from approximately 5 to 15 feet above the surrounding grade. The surface soil visible on these mounds was comprised of a gray and black sandy material with some coke-like pieces mixed within. As described in Section 3.2.2, this material is manmade fill material. Additionally, a brown sandy slag-like material was observed on the ground surface of the level portions on the north half of the property. Saturated conditions and wetland vegetation (e.g., Phragmites and cat tails) was observed in the vicinity of the creek as well as portions of the northern half of the property. Trails likely used by ATVs (e.g., 4-wheelers) were observed in the on the northern half of the subject property.

Photographs taken during the site reconnaissance are included in Appendix H.

6.1.2 Pits, Ponds, Lagoons

Other than the wetland like conditions observed in the vicinity of the unnamed creek and portions of the northern half of the property, the examination of the subject property did not identify pits, ponds, or lagoons at the time of the site reconnaissance.

6.1.3 Pools of Liquid

No pools of liquid were observed during the site reconnaissance.

6.1.4 Stained Soils and Surfaces

The examination of the subject property did not identify any stained soil/surfaces.

6.1.5 Stressed Vegetation

No stressed vegetation was identified during the examination of the subject property.

6.1.6 Strong or Noxious Odors

No strong or noxious odors were detected during the site reconnaissance.

6.1.7 Drains or Sumps

No drains or sumps were identified on the subject property during the site reconnaissance.

6.1.8 Indications of Solid Waste Disposal

As previously described, fill material was observed in mounds as well as at the ground surface throughout the northern half of the subject property. Additionally, several small piles of construction and demolition debris were observed in the northern half of the property. No other indications of solid waste disposal were identified on the subject property during site reconnaissance.

6.1.9 Unidentified Substance Containers

Approximately, 15 to 20 unlabeled 55-gallon drums were observed in the center of the site. A majority of these drums were empty, rusted and in poor condition. Several drums contained a black, tar-like substance; however, no indications of stains or leaks were observed on the exterior of the drums or on the ground surface in the vicinity of the drums. No other unidentified substance containers were noted during site reconnaissance.

6.1.10 Hazardous Waste, Hazardous Substances, and Hazardous Materials

During site reconnaissance, no hazardous waste, hazardous substances or hazardous materials were observed.

6.1.11 Storage Tanks (UST, AST)

No evidence of underground storage tanks or aboveground storage tanks was noted during site reconnaissance.

6.1.12 Indications of PCBs

Dielectric fluids in electrical transformers placed in service prior to 1980 have been known to contain PCBs. No electrical transformers were observed on the subject property.

6.1.13 Wastewater Disposal

There were no buildings located on the subject property; therefore, no wastewater is generated on site.

6.1.14 Lead Based Building Materials

There were no buildings and/or other structures located on the subject property and, therefore, no painted surfaces likely to contain lead were observed.

6.1.15 Asbestos Containing Building Materials

As there are no buildings or other structures located on the subject property, no ACM were visible during the site reconnaissance.

6.2 Interviews

6.2.1 Property Owner/Occupant

Contact information was not available for the property owner; therefore the property owner was not interviewed for this Phase I ESA.

6.2.2 Adjacent Property Owners/Occupants

No adjacent property owners were interviewed about the subject property. However, representatives of R & L Carriers and Enbridge Energy which occupy the adjoining properties to the north and south, respectively, were interviewed regarding the subject property. These representatives were not aware of any environmental concerns associated with the subject property. However, the representative from Enbridge Energy indicated that an environmental investigation that involved the installation of groundwater monitoring wells and soil borings was being conducted on the adjoining property to the west. Additionally, this representative indicated that an aboveground storage tank and building were being demolished on a property located approximately 300 feet northeast of the subject property.

6.2.3 User Questionnaire

A Phase I ESA user questionnaire was completed by Jim Hartz from the Town of Tonawanda Community Development Department. A copy of the user questionnaire is included in Appendix J. Mr. Hartz did not know of any environmental concerns with respect to the subject property.

A second user questionnaire was completed by Kenneth Swanekamp, Erie County Director of Business Assistance, who is familiar with the subject property. Mr. Swanekamp indicated that the Army Corps completed a radioactive material cleanup on a portion of Rattlesnake Creek and that this may have affected the creek swale areas on the subject property. This site is discussed in Section 5.2.11.

7.0 PHASE I ENVIRONMENTAL SITE ASSESSMENT DATA GAPS

This section identifies the data gaps encountered during the performance of this Phase I ESA. A data gap is defined as a lack of or inability to obtain information required by

ASTM E1527-05 despite good faith efforts by the environmental professional to gather such information. Data gaps may result from incompleteness of any activities required by this practice, including but not limited to site reconnaissance, interviews, records review, etc. The data gaps encountered during this Phase I ESA included the following:

- Interviews with current and/or historical property owners were not conducted. However, based upon the review of historical information and local, state and federal record sources during the performance of this ESA, sufficient information was available for identifying recognized environmental conditions and other areas of environmental concern during the entire developed use of the property. Therefore, the fact that current and/or historical property owners were not interviewed does not significantly impact the findings of this report.
- A response to the August 19, 2009 FOIL letter to NYSDEC to date has not been received. However, an environmental database search report of state and federal record sources for the subject property and vicinity was obtained from EDR. Databases searched for by EDR include those maintained by the NYSDEC. The EDR report did not identify the subject property or adjoining property on state or federal databases. Therefore, it is not anticipated that the NYSDEC will have any additional information that would change the conclusions of this ESA. However, any information obtained from the NYSDEC within 180 days of this report will be forwarded upon receipt.

8.0 FINDINGS AND CONCLUSIONS

A Phase I Environmental Site Assessment (ESA) (see Figure 1) was completed for the subject property located at 5565 River Road in the Town of Tonawanda, New York. This section provides a summary of the Phase I ESA findings and conclusions relating to recognized environmental conditions.

8.1 Summary of Findings

- The subject property consists of one parcel which is approximately 37 acres in size. The property is currently vacant and undeveloped.
- The subject property is zoned industrial and is currently vacant.
- Land use in the vicinity of the subject property is characterized as a mixture of industrial and commercial uses. The majority of the adjoining property to the west is vacant and undeveloped and consists of a mixture of forested land, overgrown grass and shrubs. A small steel-sided structure is located at the north end of this property along River Road. The adjoining property to the north is occupied by R&L Carriers, a

trucking depot for lighter-than-truckload freight and the adjoining property to the south is occupied by a crude oil pipeline pumping station operated by Enbridge Energy Inc. Adjoining the subject property to the east is the sewer outfall for the Town of Tonawanda.

- During site reconnaissance, approximately, 15 to 20 unlabeled 55-gallon drums were observed in the center of the site. A majority of these drums were empty, rusted and in poor condition. Several drums contained a black tar like substance; however, no indications of stains or leaks were observed on the exterior of the drums or on the ground surface in the vicinity of the drums.
- A number of large mounds upon which mature trees grow were observed on the northern half of the property during site reconnaissance. These mounds range in size from approximately 200 square feet to more than 2,000 square feet in size and range in height from approximately 5 to 15 feet above the surrounding grade. The surface soil visible on these mounds was comprised of a gray and black sandy material with some coke-like pieces mixed in.
- A review of historical aerial photographs dating back to 1927 indicated that the subject property has been vacant and undeveloped since at least that time.
- A review of standard local, state and federal record sources relating to the presence or occurrence of facilities or spill sites involving solid and/or hazardous wastes and petroleum products indicated that the subject property was not listed on any of the searched databases.
- State and federal record sources indicate the presence of a number of off-site facilities and spill sites involving solid/hazardous wastes and petroleum products within the approximate minimum search distances established in ASTM E 1527-05. The majority of these sites had been cleaned and NYSDEC cleanup standards had been met.

Two sites, the Former MOSF Facility site, located 0.05 mile west of the subject property, and the Pipeline Site, located along the western edge of the subject property were identified as sites at which NYSDEC cleanup standards were not met. 5335 River Road is currently under investigation by the NYSDEC. The NYSDEC indicated that the tank on this site had not been in use since the early 1990s and was demolished and removed from the site in July 2009. The NYSDEC indicated that the subsurface investigation of this site has revealed petroleum contamination in the subsurface soil; however, due to the low permeability of the soil on this

site, petroleum contamination is localized. Additionally, the investigation of groundwater at this site did not reveal any significant contamination. Lastly, the NYSDEC indicated that the Department is in the process of removing the grossly contaminated petroleum impacted soil from this site. Based on the currently remedial status and its hydrogeologic position cross gradient of the subject property, this site is not likely to represent an environmental threat to the subject property.

The Pipeline site is currently under investigation by the NYSDEC. The the subject property, across River Road. Based on the separation distance and the hydrogeological position downgradient from the subject property, this site is not likely to pose an environmental concern relative to the subject property.

8.2 Conclusions

8.2.1 Recognized Environmental Conditions

A Phase I Environmental Site Assessment has been performed in conformance with the scope and limitations of ASTM Practice E 1527-05 for the subject property located at 5565 River Road in the Town of Tonawanda, New York. This assessment has revealed the following recognized environmental conditions in connection with the subject property:

- The unlabeled 55-gallon drums observed in the center of the site. A majority of these drums were empty, rusted and in poor condition. Several drums contained a black, tar-like substance; however, no indications of stains or leaks were observed on the exterior of the drums or on the ground surface in the vicinity of the drums.
- A number of large mounds upon which mature trees grow were observed on the northern half of the property during site reconnaissance. These mounds range in size from approximately 200 square feet to more than 2,000 square feet in size and range in height from approximately 5 to 15 feet above the surrounding grade. The surface soil visible on these mounds was comprised of a gray and black sandy material with some coke-like pieces mixed it.

9.0 LIMITATIONS

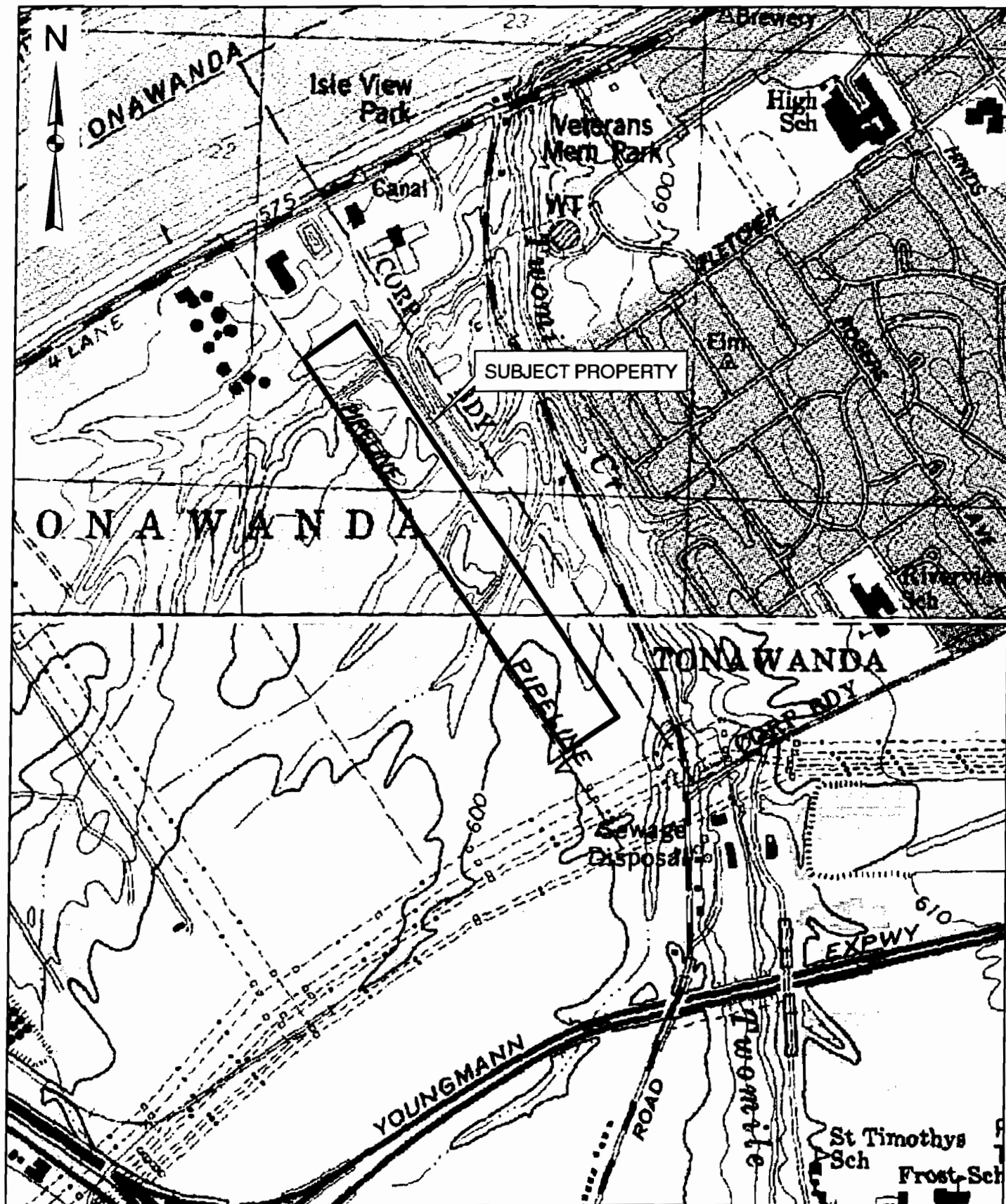
The conclusions presented in this report are based on information gathered in accordance with the Scope of Services defined in Section 2.0 of the report using generally accepted professional consulting principles and practices. All conclusions reflect observable conditions existing at the time of the site inspection. Information

provided by outside sources (individuals, agencies, laboratories, etc.), as cited herein, was used in the assessment of the site. The accuracy of the conclusions drawn from this assessment is, therefore, dependent upon the accuracy of information provided by these sources. Furthermore, TVGA is not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to the performance of services.

This report is based upon the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations. Professional judgments expressed herein are based upon the facts currently available within the limits of the existing data, scope of services, budget, and schedule. To the extent that more definitive conclusions are desired by the Client than are warranted by the current available facts, it is specifically TVGA's intent that the conclusions and recommendations stated herein will be intended as guidance and not necessarily a firm course of action except where explicitly stated as such. TVGA makes no warranties, expressed or implied including without limitation, warranties as to merchantability or fitness of a particular purpose. Furthermore, the information provided in this report is not to be construed as legal advice.

This assessment and report have been completed and prepared on behalf of and for the exclusive use of the Town of Tonawanda. Any reliance on this report by a third party is at such party's sole risk. Furthermore, nothing contained in this report shall be construed as a warranty or affirmation by TVGA that the subject property described in this report are suitable collateral for any loan or that acquisition of such property by any lender through foreclosure proceedings or otherwise will pose no risk of potential environmental liability on the part of such lender.

FIGURES



SITE LOCATION MAP

TVGA
CONSULTANTS

1000 MAPLE ROAD
ELMA, NEW YORK 14059-9530
P. 716.655.8842
F. 716.655.0937
www.tvga.com

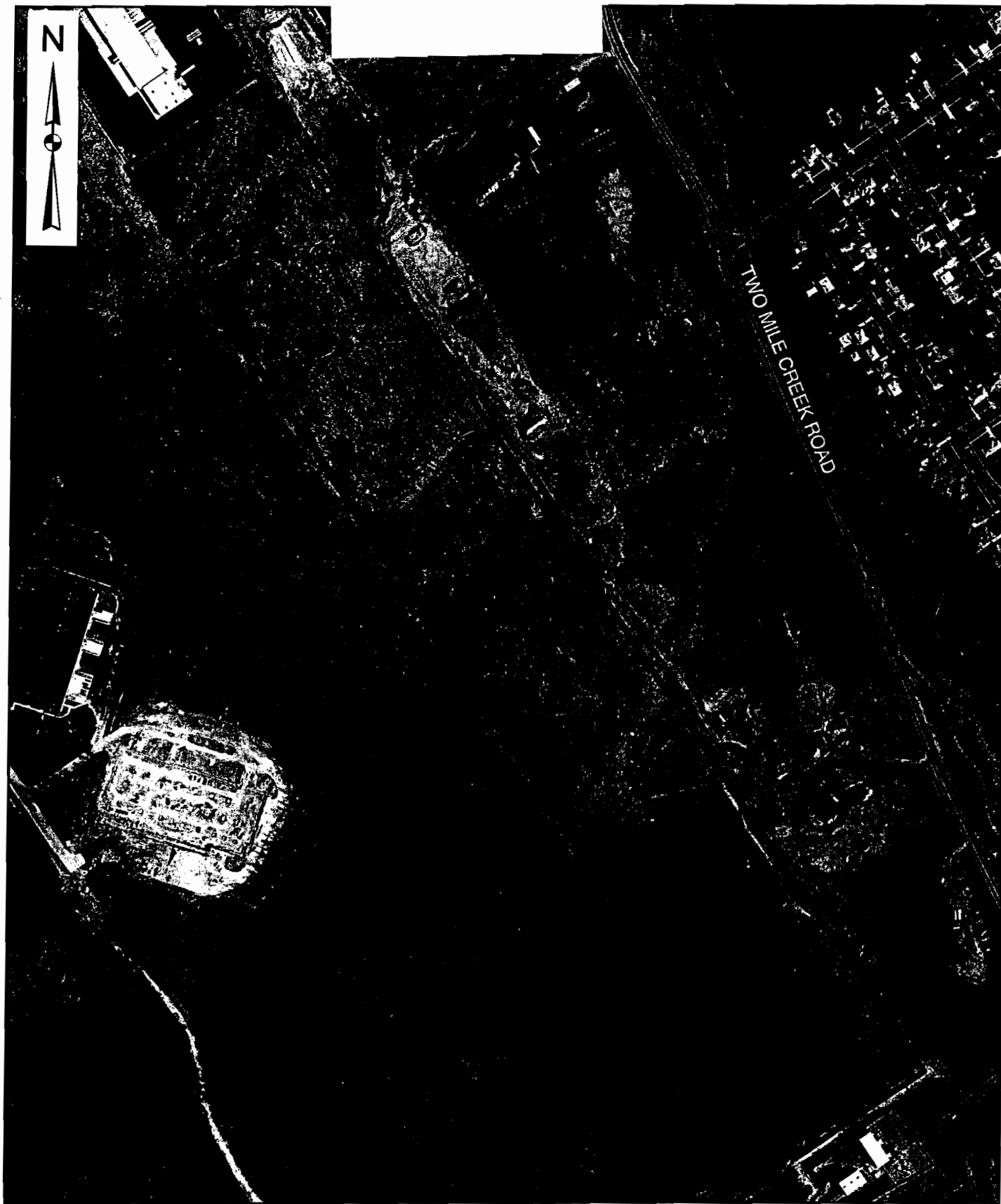
5565 RIVER ROAD
TONAWANDA, NEW YORK

PROJECT NO. 2009.0144.00

SCALE: 1" = 1000'

DATE: AUGUST 2009

FIGURE NO. 1



SITE PLAN

TVGA
CONSULTANTS

1000 MAPLE ROAD
ELMA, NEW YORK 14059-9530
P. 716.655.8842
F. 716.655.0937
www.tvga.com

5565 RIVER ROAD
TONAWANDA, NEW YORK

PROJECT NO. 2009.0144.00

SCALE: 1" = 400'

DATE: AUGUST 2009

FIGURE NO. 2

APPENDIX A

COMPLIANCE CHECKLIST



**Checklist for Compliance With ASTM E 1527- 05
Phase I - Environmental Site Assessment**

Report Identification: Phase I Environmental Site Assessment for 5565 River Road
 Report Number: 2009.0144.00
 Client: Town of Tonawanda
 Personnel Conducting: Angela M Keppel
 Personnel Reviewing: Daniel E. Riker
 This form Prepared By: TVGA Consultants based on ASTM E 1527-05 Standards

Signature: _____
 Date: _____

[Handwritten Signature]
 4/17/09

I. Mandatory Records Review:

Reviewed?	Reason for not Reviewing (A-D)	Standard Environmental Record Sources	Minimum Search Distance	Date Last Updated	Within 90 Days
Y		Federal NPL	1.0 mile	7/31/2009	YES
Y		Federal delisted NPL	0.5 mile	2/2/2009	NO
Y		Federal CERCLIS	0.5 mile	1/9/2009	NO
Y		Federal CERCLIS NFRAP	0.5 mile	12/3/2007	NO
Y		Federal RCRA CORRACTS	1.0 mile	3/25/2009	NO
Y		Federal RCRA TSD	1.0 mile	11/12/2008	NO
Y		Federal RCRA Generators	property and adjoining	12/31/2008	NO
Y		Federal ERNS List	property only	12/31/2007	NO
Y		State Hazardous Waste Sites	1.0 mile	6/9/2009	YES
Y		State Landfill and/or Solid Waste Sites	0.5 mile	6/23/2009	YES
Y		State LTANK	0.5 mile	6/9/2009	YES
Y		State RUST	property and adjoining	7/21/2009	YES
Y		State Institutional/Engineering Control Sites	property	6/9/2009	YES
Y		State Voluntary Cleanup Sites	0.5 mile	6/9/2009	YES
Y		State Brownfield Sites	0.5 mile	6/9/2009	YES

A = not reasonably ascertainable
 B = not publicly available
 C = not obtainable within reasonable time and costs
 D = not practically reviewable

II. Historical Use Information	YES	NO	REASON FOR NOT REVIEWING
Past Uses of Site to First Developed Use or to 1940 Identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Past Uses of Adjoining Sites Identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Aerial Photographs Reviewed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Agencies Visited Listed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Land Title Records Reviewed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Environmental Liens Identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Building Department Records Reviewed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Property Tax Files Reviewed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Local Street Directories Reviewed	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Fire Insurance Map Reviewed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

A = not reasonably ascertainable
 B = not publicly available
 C = not obtainable within reasonable time and costs
 D = not practically reviewable

III. Site Reconnaissance	YES	NO
Site Visit Completed	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Limitations Identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Methodology Identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Occupants Identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Property Use Identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Current Uses of Adjoining Sites Identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
USGS Physical Setting Source	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Topographic Conditions Described	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Exterior Conditions:**YES****NO****REFER TO
SECTION**

Pits, Ponds, Lagoons Present

☐

Pools of Liquid Identified

☐

Stained Soil or Pavement Identified

☐

Stress Vegetation Present

☐

Solid Waste Identified

☐

Waste Water Designation Identified

☐

Sewage Disposal System Identified

☐

Active or Dry Wells Present

☐

Septic System Present

☐

PCB Containing Transformers Present

☐

Fill Dirt Present

☐

Construction and Demolition Debris Identified

☐

Strong and/or Noxious Odors Identified

☐

Interior/Exterior Conditions:**YES****NO****REFER TO
SECTION**

Asbestos/ACM Present

☐

Hazardous Substance Present

☐

Hazardous Waste Present

☐

Hazardous Materials Present

☐

Unidentified Substance Containers Identified

☐

Hazardous Substance and Petroleum

Products Containers

☐

MSDS Sheets Present

☐

Drums Present

☐

Solvents Present

☐

Petroleum Products Present

☐

Heating/Cooling Fuel Identified

☐

Stains or Corrosion Identified

☐

Drains and Sumps Present

☐

PCB Containing Equipment

☐

Potable Water Supply

☐

IV. Interviews	YES	NO
User Identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Specialized Knowledge from User Identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Key Site Manager Identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Occupants Identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transaction Questionnaire Completed	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Local Fire Department Official Contacted	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Local/State Health Agency Official Contacted	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Local/State Environmental Agency having Hazardous Waste Disposal Information Contacted	<input checked="" type="checkbox"/>	<input type="checkbox"/>
 V. Report	 YES	 NO
Report Preparer is Identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Qualifications of Environmental Professional is Identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Report Contains a Findings and Conclusions Section	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Report States if Recognized Environmental Conditions Present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Report Contains Environmental Professionals Opinion Regarding the Impact of any Recognized Environmental Conditions	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Report Contains all Deletions and Deviations from ASTM E 1572-05	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Report is Signed by Environmental Professionals	<input checked="" type="checkbox"/>	<input type="checkbox"/>

APPENDIX B

AERIAL PHOTOGRAPHS

River Road Properties

5211, 5565, 5605, 5611 River
Tonawanda, NY 14150

Inquiry Number: 2565489.4

August 17, 2009

The EDR Aerial Photo Decade Package



EDR[®] Environmental Data Resources Inc

440 Wheelers Farms Road
Milford, CT 06461
800.352.0050
www.edrnet.com

EDR Aerial Photo Decade Package

Environmental Data Resources, Inc. (EDR) Aerial Photo Decade Package is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDRs professional researchers provide digitally reproduced historical aerial photographs, and when available, provide one photo per decade.

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Please contact EDR at 1-800-352-0050
with any questions or comments.

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Date EDR Searched Historical Sources:

Aerial Photography August 17, 2009

Target Property:

5211, 5565, 5605, 5611 River

Tonawanda, NY 14150

<u>Year</u>	<u>Scale</u>	<u>Details</u>	<u>Source</u>
1959	Aerial Photograph. Scale: 1"=750'	Panel #: 2443078-A8/Flight Date: May 08, 1959	EDR
1966	Aerial Photograph. Scale: 1"=500'	Panel #: 2443078-A8/Flight Date: June 12, 1966	EDR
1978	Aerial Photograph. Scale: 1"=833'	Panel #: 2443078-A8/Flight Date: October 31, 1978	EDR
1983	Aerial Photograph. Scale: 1"=750'	Panel #: 2443078-A8/Flight Date: March 17, 1983	EDR
1985	Aerial Photograph. Scale: 1"=1000'	Panel #: 2443078-A8/Flight Date: May 03, 1985	EDR
1995	Aerial Photograph. Scale: 1"=750'	Panel #: 2443078-A8/Flight Date: March 28, 1995	EDR
2006	Aerial Photograph. 1" = 604'	Flight Year: 2006	EDR

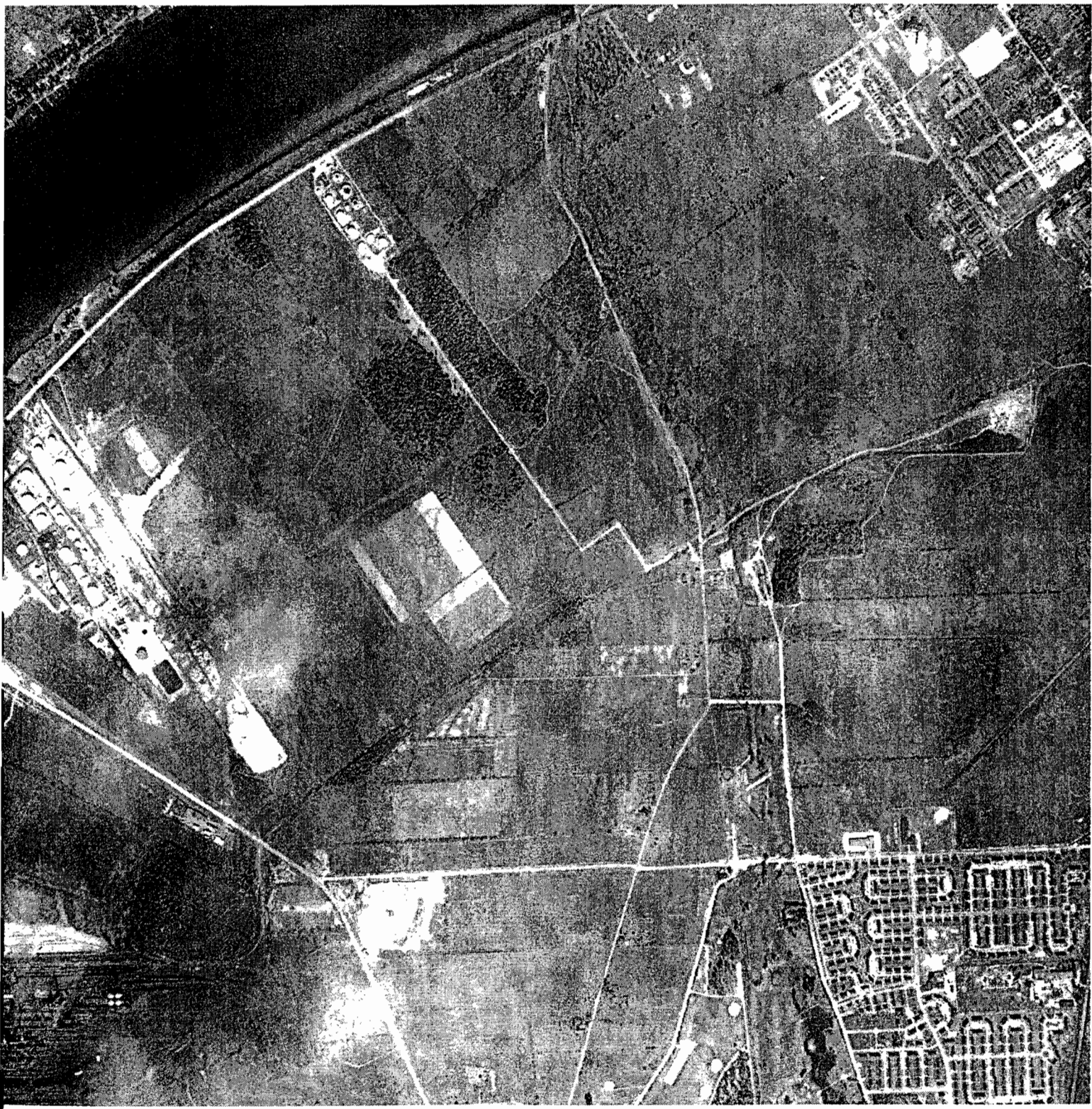


ACTUAL WORK BY ROBERT A. WASHINGTON REFLECTS NEW YORK
ENGINEERING & MAP BY FRANCISCO AERIAL SURVEYS INC NEW YORK

COPYRIGHT 1927
GEORGE C. DIEHL, COUNTY ENGINEER

ERIE COUNTY NEW YORK
OFFICE OF THE COUNTY ENGINEER
GREATER MOTORWAY SYSTEM
JUNE 14 1927

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QUIRY #: 2565489.4

AR: 1959

= 750'





INQUIRY #: 2565489.4

YEAR: 1966





QUIRY #: 2565489.4

EAR: 1978



- 833'



INQUIRY #: 2565489.4

YEAR: 1983

= 750'





QUIRY #: 2565489.4

AR: 1985

= 1000'



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INQUIRY #: 2565489.4

YEAR: 1995

Scale: 1:750'





QUIRY #: 2565489.4

AR: 2006

| = 604'



APPENDIX C

FIRE INSURANCE MAPS
