INVENTUM ENGINEERING, PC

June 30, 2021

Mr. Glenn May
Project Manager
Division of Environmental Remediation
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203-2915

RE: Tulip Molded Plastics Corporation Site
Site No. 932169
Supplemental Scoping Investigation Work Plan
Inactive Hazardous Waste Disposal Site Determination

Dear Mr. May:

Inventum Engineering, PC (Inventum), on behalf of Ganson Alternative Energy, LLC (GAE), is pleased to provide this *Supplemental Scoping Investigation Work Plan (Work Plan)* for the Tulip Molded Plastics Corporation Facility (Figure 1) located at 3125 Highland Avenue, Niagara Falls, New York (the "Site"). The supplemental scoping investigation is being conducted in response to a letter dated December 11, 2018 from the New York State Department of Environmental Conservation (NYSDEC) regarding potential listing of a portion of the Site on the Registry of Inactive Hazardous Waste (IHWS) Disposal Sites (the "Registry").

GAE is the Site owner and leases the Site to the Tulip Corporation (Tulip). Tulip produces molded plastic products for the automotive industry and injection molded recycling containers and other specialized plastic containers. The Site is located in a commercial, industrial, and residential area of Niagara Falls, New York and is bounded to the south by the former Power City Warehouse (a.k.a. Tract I Site (Brownfield Cleanup Program [BCP] Site No. 932157)), to the east by a narrow strip of land owned by National Grid[1] and beyond by the Tract II Site (BCP Site No. 932136), to the west by Highland Avenue, and to the north by Braun Horticulture (Figure 1).

The NYSDEC's December 11, 2018 letter identified a general area on the site of "documented disposal of hazardous waste" as well as concentration(s) of lead in soil samples above 6 NYCRR Part 375 Soil Cleanup Objectives (SCOs) in two areas along the eastern and southern boundary of the Site (Attachment A). In lieu of the potential listing, an Order on Consent and Administrative Settlement (Index No. CO 9-20200107-2; Site No. 932169) was issued in February 2020 and GAE elected to complete an initial site investigation to further characterize the potential nature and

[1] This is a utility right of way and is also known as the 15th Street ROW in the Tract II (BCP Site No. 932136) documentation.

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extent of potential contamination as described in the NYSDEC's notification letter. Inventum submitted an *IHWS Site Investigation Work Plan* to the NYSDEC on June 2, 2020, which was approved in an e-mail dated July 22, 2020.

The IHWS Site Investigation was conducted September 21-23, 2021 and Inventum provided a draft data summary memorandum to the NYSDEC on January 4, 2021. The intent of the memorandum was to guide a discussion with the NYSDEC regarding the appropriate response, if any additional actions are deemed necessary, through which environmental conditions on the Site will be addressed in an effective and efficient manner.

A conference call was held on January 25, 2021 with GAE, Inventum, NYSDEC, and NYDOH to discuss the IHWS Site Investigation findings. The NYSDEC/NYSDOH indicated that additional investigation would likely be required to make a listing/no listing determination. This Work Plan describes the supplemental investigation measures GAE will undertake to provide sufficient data with the goal of a no further action determination.

IHWS Site Investigation Results

The IHWS Site Investigation was conducted September 21-23, 2020 in accordance with the approved June 2, 2020 Work Plan, DER-10 *Technical Guidance for Site Investigation and Remediation*, and the site-specific Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP).

Five (5) direct push soil borings (SB-001 through SB-005) were installed in the "area of documented disposal of hazardous waste" and six (6) soil borings (SB-006 through SB-011) were advanced along the southern and eastern perimeter property boundary (Figure 2). Soil borings were installed by Earth Dimensions, Inc. of Elma, New York under Inventum's direction. Borings were extended to the depth that groundwater was encountered, which was typically between 8 to 10-feet below ground surface (bgs). In general, fill material was identified to depths of 5 to 8-feet bgs in all borings installed. The fill material primarily consisted of reworked native clay and silty clay and sands/gravels with more prevalent accumulations of coal, brick, and other materials in the zone from ground surface to approximately 2-feet bgs. Native soils were typically encountered at depths of 5 to 8-feet bgs and consisted of a reddish-brown Clay, Clayey Silt, or Silty Clay that was generally stiff with moderate plasticity and trace amounts of fine sand and gravel.

Recovered soil was screened with a photoionization detector (PID) equipped with a 10.6 electron volt (eV) lamp. One (1) shallow (0 to 1 feet) soil sample was collected from the fill material at each boring. Two (2) subsurface samples were also collected at each boring. One (1) subsurface sample was collected from the top of the native material and one (1) sample was collected from native material at the base of the boring. All samples were analyzed for Target Analyte List (TAL) metals via EPA Method 6010C (Table 1; Figure 2). Samples were also analyzed for volatile organic compounds (VOCs) using EPA Method 8260 and Semi-Volatile Organic Compounds (SVOCs) using EPA Method 8270 if there was visual or olfactory evidence of impact or PID readings indicative of organic contamination.

Area of Documented Disposal of Hazardous Waste

None of the samples from the "area of documented disposal of hazardous waste" contained lead at concentrations above either the Commercial Use SCO of 1,000 mg/kg or the Industrial Use SCO of 3,900 mg/kg (Table 1; Figure 2). The duplicate sample collected from 4 to 5-feet bgs at SB-001 contained copper at a concentration of 386 mg/kg, which is above the Commercial Use SCO of 270 mg/kg. The corresponding primary sample contained copper a concentration (72 mg/kg) well below the Commercial Use SCO. None of the recovered soils from this area exhibited any visual, olfactory, or field screening (i.e. PID) evidence of volatile organic contamination.

The three (3) samples from this area with the highest concentration of lead were also analyzed for lead via the TCLP (Table 1a; Figure 2a). The sample collected from 4 to 5 feet bgs at SB-001 contained total lead at a concentration of 806 mg/kg and a TCLP-lead concentration of 0.17 milligrams per liter (mg/L). The sample collected from 0 to 1-feet from SB-002 contained a total lead at a concentration of 831 mg/kg and a TCLP-lead concentration of 3.8 mg/L. The sample collected from 0 to 1-feet at SB-003 contained total lead at a concentration of 801 mg/kg and a TCLP-lead concentration of 13.1 mg/L, which is above the characteristic toxicity threshold of 5 mg/L Based on the distribution of samples, Inventum estimates there could be approximately 4,500 cubic feet (166 cubic yards, 310 tons) of soil with the potential for TCLP-lead above the characteristic toxicity threshold of 5 mg/L (Figure 2a)[2].

Additional delineation of soils surrounding SB-003 with TCLP-lead above the characteristic toxicity threshold is proposed in this Work Plan.

Southern and Eastern Property Boundary

None of the samples from the southern and eastern property boundary contained lead at concentrations above the Commercial Use or Industrial Use SCOs (Table 1; Figure 2). Further, none of the samples contained any metals constituents above their respective Commercial Use or Industrial Use SCO.
The three (3) samples from this area with the highest concentration of lead were also analyzed for lead via the TCLP (Table 1a: Figure 2a). The sample collected from 2 to 3 feet bgs at SB-006 contained total lead at a concentration of 337 mg/kg and a TCLP-lead concentration of 0.71 mg/kg. The sample collected from 0 to 1 foot at SB-010 contained total lead at a concentration of 340 mg/kg and was non-detect for TCLP-lead.

The sample collected from 1.5 to 2 feet bgs at SB-007 contained total lead at a concentration of 258 mg/kg and a TCLP-lead concentration of 5.03 mg/L, just slightly above the characteristic toxicity threshold of 5 mg/L. Inventum estimates there could be approximately 300 cubic feet (11 cubic yards, 21 tons) of soil with the potential for TCLP-lead above the characteristic threshold of 5 mg/L in the area around SB-007. Additional delineation of soils surrounding SB-007 with TCLP-lead above the characteristic toxicity threshold is proposed in this Work Plan.

[2] Estimates assumes potential vertical impact to 4-feet bgs based on the total lead concentration of 263 mg/kg at SB-003 at that depth. Estimate assumes potential horizontal impact based on total lead and TCLP results at SB-002 and total lead results at SB-004.

Field screening of soils recovered from SB-008 indicated potential for organic contamination. There was a creosote like odor in the boring from approximately 4 to 8 feet bgs within the fill material and particularly within woody material recovered from approximately 5 to 5.5 feet bgs. The maximum PID readings from the recovered soils were only 10 parts per million (ppm).

In addition to the TAL metals analysis, all three samples collected from SB-008 (1 to 2 feet; 5 to 6 feet; and 9 to 10 feet) were also analyzed for VOCs and SVOCs (Table 2; Figure 3). Several VOCs were detected above the reporting limit (acetone, ethylbenzene, isopropylbenzene, and xylenes) but at concentrations orders of magnitude below their respective Commercial or Industrial Use SCO. Likewise, several SVOCs were detected, but only two were detected at concentrations above either the Commercial or Industrial Use SCO. Benzo(a)anthracene (8,100 micrograms per kilogram [µg/kg]) was detected in the sample from 5 to 6-feet bgs above the Commercial Use SCO of 5,600 µg/kg and benzo(a)pyrene (4,500 ug/kg) was detected above the Industrial Use SCO of 1,100 µg/kg.

Groundwater Monitoring

Three (3) monitoring wells (MW-1, MW-2, and MW-3) were installed in August 2011 as part of a Phase II Environmental Site Assessment (Figure 2) and are screened across the fill and native materials. Prior to sampling, each well was re-developed by Earth Dimensions. The goal was to remove a minimum of five (5) wells volumes of groundwater with a dedicated polyvinyl bailer. MW-1 and MW-3 went dry during the development process and the water level was allowed to recover for approximately 1-hour before purging again. The groundwater level in each well was located between 4 and 6-feet bgs which is consistent with the findings of the Phase II ESA. The groundwater is likely perched, and flow is likely towards the southwest (MW-3: Upgradient; MW-1 and MW-2: Downgradient) based on documentation from the adjacent Tract I and Tract II remediation sites.

Groundwater samples were collected for Target Compound List (TCL) VOCs using EPA Method 8260C, TCL SVOCs using EPA method 8270D, and TAL Metals using EPA Method 6010C.

Groundwater sampling data from the 2011 Phase II ESA and the September 2020 IHWS Investigation are provided in Table 3. Several metals (iron, lead, magnesium, manganese, sodium, and thallium) were detected in the samples from September 2020 at concentrations above their applicable 6 NYCRR Water Quality Standard/Guidance values for Class GA waters. Lead was only detected at MW-2 at a concentration of 57 micrograms per liter (µg/L) above the Class GA standard of 25 µg/L. Lead was not detected at MW-1 which would be considered downgradient of the area of soil stabilization conducted by AECOM in 2012-2013.

Naphthalene was detected at a concentration (16 ug/L) above the Class GA standard of 10 ug/L in MW-1. Trichloroethene (TCE) and cis-1,2-Dichloroethene (cis-1,2-DCE) were detected at MW-2 at concentrations of 39 ug/L and 11 ug/L, respectively, above the Class GA standards of 5 ug/L. TCE and cis-1,2-DCE were also detected at MW-2 during the Phase II ESA (Table 3); however, the overall decrease in concentration of both compounds between 2011 and 2020 (TCE: 120 ug/L to 39 ug/L; cis-1,2-DCE: 19 ug/L to 11 ug/L) indicates there is evidence of natural attenuation.

There is no evidence from the groundwater sampling data or soil sampling/screening that there was ever an active VOC “source” area. Further, at the concentrations detected in groundwater samples from MW-2,

the presence is likely the result of limited historic use of the industrial typical solvent and isolated to the vicinity of MW-2.

Additional delineation downgradient of MW-2 along the southern property boundary with the Tract I Site is included in this Work Plan.

Supplemental Scoping Investigation Scope

TCLP Lead Delineation

An excavation will be conducted in the vicinity of SB-003 and SB-007 to further delineate the extent of soils with TCLP-lead above the characteristic toxicity threshold. The approximate limits of the excavations are shown on Figure 5. Soils around SB-003 will initially be excavated to a depth of approximately 4-feet bgs. Soils around SB-007 will initially be excavated to a depth of approximately 3-feet bgs. Excavated soils will either stockpiled on plastic sheeting (min 10-mil) in an area north of the former manufacturing building (Figure 5) or loaded into roll-off bins lined with plastic sheeting. Two (2) composite samples of the stockpiled material will be collected and analyzed, at minimum, for TAL Metals using EPA method 6010C and TCLP-lead using EPA Method 1311/6010C. Additional sample parameters and sampling frequency will be dictated by the requirements of the disposal facility. The soils containing lead above the toxicity characteristic will be stockpiled onsite for (Figure 5) characterization and offsite disposal. Soils containing lead above the Industrial Use SCO or the toxicity threshold will not be returned to the test pit cavity.

Grab samples of the excavation bottom and sidewalls will be collected prior to backfill. One (1) sample from each of the excavation sidewalls will be collected for every 100 linear feet of wall length. The excavation bottom will be divided into four quadrants and one (1) sample will be collected from each quadrant. Samples will be analyzed for TAL Metals and TCLP-lead on an expedited (48-hour) turn-around-time. If required and site features allow, the excavation limits will be extended horizontally (min 5-feet) and/or vertically (min 1-foot) if TCLP results exceed the toxicity characteristic threshold.

The excavation will be backfilled with imported fill approved for commercial use. Inventum will submit a *Request to Import Fill* to the NYSDEC for approval prior to bringing any material onsite. The backfill will be placed to 12-inches bgs in 6-inch lifts and compacted. An 8-inch (compacted) aggregate base course will be placed above the backfill followed by an asphalt leveling and wearing course to match existing grade.

Groundwater Monitoring Well Installation

Two (2) new groundwater monitoring wells (MW-4 and MW-5) will be installed at the approximate locations shown on Figure 5. MW-4 will be an upgradient well installed north of the former manufacturing facility and east of the 2012-2013 In-Situ Soil Stabilization Area. MW-5 will be a downgradient well on the southern property boundary with the Tract I parcel.

Borings for the new wells will be advanced through the overlying fill material to approximately 15-feet bgs to monitor shallow groundwater, which is anticipated to be between 7 and 9-feet bgs based on the borings installed during the IHWS Investigation in September 2020. Unconsolidated material samples will

be collected for observation and screening with a PID equipped with a 10.6 eV lamp in a continuous interval over the total depth of the boring with a split barrel sampler driven through the augers. One (1) shallow (0 to 1 feet) and one (1) subsurface (1-foot above the saturated interval, if present) will be collected at each boring location and analyzed for TAL Metals via EPA method 6010C. Additional samples will be collected for VOC and SVOC analysis only if there is a visual or olfactory evidence of impact or PID readings indicate evidence of organic contamination.

Each well will be screened with a 2-inch diameter Schedule 40 polyvinyl chloride (PVC) well casing and a minimum of 10-feet of 0.010-inch slotted screen from 5 to 15-feet bgs. A sand filter pack will be placed from the bottom of the screened interval to a minimum of 1 foot above the top of the screen. A 2-foot bentonite seal will be placed on top of the filter pack and the remaining annular space will be completed with a cement grou (Portland Type I cement with 3 to 5 percent bentonite). The wells will be completed flush to-grade within a traffic rated box.

The new wells will be developed a minimum of two weeks prior to collection of samples. The water levels in the wells will be manually measured using a water interface probe and depth to water and the total depth of the well will be recorded in the field notebook. The wells will be developed by removing three well volumes, purging the wells until dry, or purging and surging the wells.

Groundwater Sampling

An initial round of sampling at the five (5) monitoring wells onsite will be conducted with a peristaltic pump using low-flow sampling procedures. All purge water will be containerized in DOT-compliance 55-gallon open topped steel drums, labeled, as non-hazardous waste, and property stored for future off-site disposal. Groundwater samples will be collected for TCL VOCs using EPA Method 8260C, TCL SVOCs using EPA Method 8270D, and TAL Metals (Total and Dissolved) using EPA Method 6010C.

Following the initial round of sampling, an Oxygen Release Compound (ORC®) Advanced Filter Sock will be installed in monitoring well MW-2 where TCE and cis-1,2-DCE were detected during the IHWS Investigation at concentrations above the Class GA standard. ORC filter socks will also be installed in MW-3 and MW-5. The ORC provides a controlled and localized release of dissolved oxygen content in the surrounding groundwater and the filter socks will be allowed to sit in the monitoring well for 60-days. The intent of the ORC is to accelerate the naturally occurring degradation of the low level TCE and cis-1,2-DCE found in MW-2. After 60-days the filter socks will be removed, and the wells will be re-developed.

A second round of sampling at the five (5) monitoring wells onsite will be conducted following removal of the ORC filter socks from MW-2, MW-3, and MW-5. The wells will be sampled following the same procedures and analysis as previously specified.

Reporting

Inventum will prepare a *Supplemental Site Investigation Scoping Report* following completion of the proposed scope of work. The report will include a summary of the data collected as part of the supplemental investigation as well as a summary of historical investigation(s) and historical investigation data – as available to GAE. The report will also provide a summary of the proposed redevelopment of the

parcel and those Site Management Activities, including voluntary Engineering and Institution Controls, that will be incorporated into the redevelopment as it relates to the potential to reach a no further action required determination relative to registry listing.

Closing

Inventum intends to begin implementing the proposed investigation immediately and will provide notice to the NYSDEC a minimum of 10-days prior to conducting any intrusive field work.

If you have any questions regarding the above, please feel free to contact me at 571.217.3627 or todd.waldrop@inventumeng.com.

Sincerely,

Todd Waldrop
Inventum Engineering, PC

Ecc: Jon Williams - Ganson Alternative Energy, LLC
John Yensan - OSC, Inc
John Kolaga - Rupp, Baase, Pfalzgraf, Cunningham LLC
David Pfalzgraf - Rupp, Baase, Pfalzgraf, Cunningham LLC
Wanda Smith Campbell - AIG Environmental & Mass Tort Claims Department
John Black, P.E. – Inventum Engineering

Tables

Table 1
Tulip Molding Plastics Facility (Site #932169)
IHWS Investigation
Soil Sampling Results
Metals

Analytes (a)	NYSDEC 6NYCRR Part 375 SCOs (b)		SB-001 SB-001-45				SB-002 SB-002-01			SB-003 SB-003-01		
	Commercial	Industrial	(0 to 1')	(4 to 5')	(4 to 5') DUP	(9 to 10')	(0 to 1')	(3 to 4')	(9 to 10')	(0 to 1')	(3 to 4')	(9 to 10')
Metals (TOTALS) (mg/kg)												
ALUMINUM	NE	NE	1010	15800	13900	17600	1890	1120	10400	15200	16300	15300
ANTIMONY	NE	NE	6.2 U	6.5 U	7.4 U	6.6 U	8.4	9.5	7 U	6.6 U	7 U	7.4 U
ARSENIC	16	16	1.6	4.6	4.2	5.8	2.9	1.3	4.2	5.6	5.7	4.3
BARIUM	400	10000	18	106	107	147	50.8	58.6	58.8	116	140	96.2
BERYLIUM	590	2700	0.31 U	0.73	0.82	0.87	0.32 U	0.36 U	0.47	0.75	0.77	0.69
CADMIUM	9.3	60	0.67	0.54 U	2.45	0.55 U	0.98	0.6 U	0.58 U	0.55 U	0.58 U	0.62 U
CALCIUM	NE	NE	172000	65200	85400	92200	173000	114000	40900	33300	14400	58700
CHROMIUM	400	800	4	21.7	16.8	27.5	17.3	1.5	15.5	83.1	27.2	21.8
COBALT	NE	NE	5.2 U	11.6	22.4	8.7	5.3 U	6 U	9.3	10	11.3	10.9
COPPER	270	10000	7.7	72	386	26.5	24.2	17.8	20.2	43.3	28.6	21.2
IRON	NE	NE	4180	28800	47900	31800	5630	1100	22300	27500	29400	28000
LEAD	1000	3900	119	806	40.2	392	831	120	8.1	801	263	12.8
MAGNESIUM	NE	NE	100000	11000	7870	11000	92600	270	7710	10000	6610	9760
MANGANESE	10000	10000	506	751	2310	756	541	19.3	866	774	780	641
MERCURY	2.8	5.7	0.034 U	0.039 U	0.807	0.039 U	0.102	0.042 U	0.04 U	0.099	0.069	0.043 U
NICKEL	310	10000	6.3	28.1	50.4	25.4	7.9	4.8 U	20.5	23.7	26.8	26
POTASSIUM	NE	NE	720	2660	1900	3090	680	680	1810	1930	1950	2700
SELENIUM	1500	6800	1 U	1.1 U	1.2	1.1 U	1.1 U	1.2 U	1.2 U	1.1 U	1.2 U	1.2 U
SILVER	3929 to 10	6800	1 U	1.1 U	1.2 U	1.1 U	1.1 U	1.2 U	1.2 U	1.1 U	1.2 U	1.2 U
SODIUM	NE	NE	340	530	310	750	480	590	280	370	270	280
THALLIUM	NE	NE	4.5	1.1 U	1.2 U	1.1 U	4.6	1.9	1.2 U	1.1 U	1.2 U	1.2 U
VANADIUM	NE	NE	12.7	32.2	26.5	40.5	10	6 U	22.8	30.5	32	30.5
ZINC	10000	10000	136	124	737	57.9	327	84.8	43	108	90.5	55.5

Table 1
Tulip Molding Plastics Facility (Site #932169)
IHWS Investigation
Soil Sampling Results
Metals

Analytes (a)	NYSDEC 6NYCRR Part 375 SCOs (b)		SB-004						SB-005						SB-006 SB-006-23						SB-007 SB-007-52					
	Commercial	Industrial	(0 to 1')		(3 to 4')		(7 to 8')		(0 to 1')		(4 to 5')		(7 to 8')		(2 to 3')		(5 to 6')		(9 to 10')		(1.5 to 2')		(4 to 5')		(9 to 10')	
Metals (TOTALS) (mg/kg)																										
ALUMINUM	NE	NE	20700		15800		10600		5090		14900		12500		20400		23100		18100		19100		15000		17900	
ANTIMONY	NE	NE	7.7	U	6.8	U	6.9		8	U	7	U	6.6	U	7.6	U	7.3	U	6.9	U	6.7	U	7	U	7.1	U
ARSENIC	16	16	5.4		5.7		2.6		1.3	U	5.4		4.7		4.8		6.9		3.8		2.9		4.7		3	
BARIUM	400	10000	169		87.7		79.7		64.5		84.8		89.7		173		139		89.6		108		96.2		87.9	
BERYLIUM	590	2700	0.77		0.72		0.46		0.4	U	0.79		0.58		0.93		1.01		0.077		0.89		0.67		0.75	
CADMIUM	9.3	60	0.64	U	0.56	U	0.58	U	0.67	U	0.58	U	0.55	U	1.59		0.61	U	0.68		0.56	U	0.58	U	0.59	U
CALCIUM	NE	NE	5940		26800		40500		174000		56200		113000		35600		3630		59800		15600		93200		63300	
CHROMIUM	400	800	31.3		23		15.5		1630		19.9		30.4		28.6		30		24.4		25.8		10.7		24.9	
COBALT	NE	NE	9.2		12.4		7.2		6.7	U	13.2		9.6		20.3		15.2		16.3		12.9		10.2		12.7	
COPPER	270	10000	36		26.7		13.4		9.2		24.5		22		40.7		25.8		21.9		27.7		23.7		20.8	
IRON	NE	NE	38900		30100		20400		1860		45100		24300		33700		35200		24000		28000		26000		26500	
LEAD	1000	3900	50.3		8.5		6		44.7		6.6		11.3		337		19		9.6		258		11.7		8.6	
MAGNESIUM	NE	NE	7270		8930		8760		20000		9070		11100		9460		7600		11800		7820		12400		11600	
MANGANESE	10000	10000	322		800		598		321		1430		710		2160		639		521		353		929		732	
MERCURY	2.8	5.7	0.04	U	0.039	U	0.04	U	0.043	U	0.041	U	0.037	U	0.039	U	0.043	U	0.038	U	0.039	U	0.049		0.038	U
NICKEL	310	10000	27.8		28		18.2		8		31.1		20.3		40.6		33		27.7		27.3		23.2		27.2	
POTASSIUM	NE	NE	2970		2250		1690		330		2410		2290		3680		2610		2430		2670		2960		3170	
SELENIUM	1500	6800	1.3	U	1.1	U	1.2	U	1.3	U	1.2	U	1.1	U	1.3	U	12	U	1.1	U	1.1		1.2	U	1.2	U
SILVER	3929 to 10	6800	1.3	U	1.1	U	1.2	U	1.3	U	1.2	U	1.1	U	1.3	U	1.2	U	1.1	U	1.1	U	1.2	U	1.2	U
SODIUM	NE	NE	430		350		290		220		210		260		310		450		430		390		390		240	
THALLIUM	NE	NE	1.3	U	1.1	U	1.2	U	4.9		1.2	U	11	U	1.3	U	12	U	1.1	U	1.1	U	1.2	U	1.2	U
VANADIUM	NE	NE	44		32.9		21.5		30.9		27.9		26.8		37.5		41.6		29.1		34.9		29.5		30.6	
ZINC	10000	10000	74.8		55.9		40.1		24.2		73.9		47.1		402		73.8		134		66.4		56.1		123	

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Soil Sampling Results
Metals

Analytes (a)	NYSDEC 6NYCRR Part 375 SCOs (b)		SB-008								SB-009						SB-010 SB-010-01						SB-011					
	Commercial	Industrial	(1 to 2')		(5 to 6')		(9 to 10')		(9 to 10') DUP		(0 to 1')		(2 to 3')		(9 to 10')		(0 to 1')		(2 to 3')		(9 to 10')		(0 to 1')		(2 to 3')		(9 to 10')	
Metals (TOTALS) (mg/kg)																												
ALUMINUM	NE	NE	12400		12200		15900		15400		10700		21000		9560		9970		17900		12000		18000		27800		11600	
ANTIMONY	NE	NE	6.9	U	6.9	U	6.9	U	6.8	U	6.5	U	7.1	U	6.8	U	6.9	U	6.7	U	6.9	U	6.9	U	7.1	U	7	U
ARSENIC	16	16	4.1		4.9		4.5		1.1	U	4.8		4.3		4.1		9.9		7		1.4		5.3		2.2		4.4	
BARIUM	400	10000	91.5		73.6		82.3		103		87		113		73.5		92.4		148		54.2		138		181		109	
BERYLIUM	590	2700	0.61		0.59		0.75		0.61		0.49		0.96		0.44		0.63		0.98		0.5		0.85		0.93		0.54	
CADMIUM	9.3	60	0.57	U	0.57	U	0.58	U	0.56	U	0.54	U	0.59	U	0.56	U	0.57	U	0.56	U	0.57	U	0.58	U	0.59	U	0.59	U
CALCIUM	NE	NE	48000		38600		65000		68600		52500		16800		55000		19800		4020		57400		75300		5780		54800	
CHROMIUM	400	800	18.8		19.1		22.8		21.7		15.5		28.9		14.6		17.5		23.8		17.9		24.6		26		17.5	
COBALT	NE	NE	9.1		10.6		11.3		8.1		8		10.7		5.8		9.2		14.6		6.9		12.2		5.9	U	9.4	
COPPER	270	10000	31.2		21		27		18.6		23		26.8		17.1		29.1		20.3		15.6		26.2		7.1		20.6	
IRON	NE	NE	23700		25600		27200		22500		22500		33500		20000		27400		37800		19400		33600		19100		23800	
LEAD	1000	3900	72.4		182		8.1		7.3		17.4		8.6		6.1		340		12.2		7.3		17.6		9.7		7.1	
MAGNESIUM	NE	NE	8840		9450		11000		11000		9570		11200		12800		5490		5750		11100		12600		3480		11300	
MANGANESE	10000	10000	523		617		614		565		700		312		413		428		1310		484		665		111		590	
MERCURY	2.8	5.7	0.122		0.285		0.037	U	0.04	U	0.037	U	0.04	U	0.039	U	0.051		0.036	U	0.039	U	0.039	U	0.06		0.036	U
NICKEL	310	10000	20.6		24.4		24.7		20.7		18.1		28.1		15.3		24.1		26		17.6		28.5		12.1		19.8	
POTASSIUM	NE	NE	2370		2600		2790		2470		1670		2250		2010		1650		1690		2490		3390		2370		2450	
SELENIUM	1500	6800	1.1	U	1.1	U	1.2	U	1.1	U	1.1	U	1.2	U	1.1	U	1.1	U	1.4		1.1	U	1.2	U	1.2	U	1.2	U
SILVER	3929 to 10	6800	1.1	U	1.1	U	1.2	U	1.1	U	1.1	U	1.2	U	1.1	U	1.1	U	1.1	U	1.1	U	1.2	U	1.2	U	1.2	U
SODIUM	NE	NE	230		290		340		350		150		130		190		140		110		240		200		120	U	250	
THALLIUM	NE	NE	1.1	U	1.1	U	1.2	U	1.1	U	1.1	U	1.2	U	1.1	U	1.1	U	1.1	U	1.1	U	1.2	U	1.2	U	1.2	U
VANADIUM	NE	NE	25.1		24.8		33.9		25.7		23		36.8		21.9		23.8		38.5		22.4		35.5		28.6		26.3	
ZINC	10000	10000	59.1		64.8		59.3		56.4		47.5		71.8		41.9		162		86		50.5		65		64.5		49.6	

Values in bold indicate a detection or estimated detection.
U = Not detected at reporting limit shown; J = Estimated value below reporting limit. NS = Not Sampled; NE = Standard Not Established
Red shaded values indicate an exceedance of the Part 375 Commercial and Industrial Use SCO
Green shaded values indicate an exceedance of the Part 375 Commercial Use SCO

Table 1
Tulip Molding Plastics Facility (Site #932169)
IHWS Investigation
Soil Sampling Results
TCLP Lead

Analytes (a)	NYSDEC 6NYCRR Part 375 SCOs (b) Commercial	Industrial	SB-001 SB-001-45 (4 to 5')	SB-002 SB-002-01 (0 to 1')	SB-003 SB-003-01 (0 to 1')	SB-006 SB-006-23 (2 to 3')	SB-007 SB-007-52 (1.5 to 2')	SB-010 SB-010-01 (0 to 1')
Metals (TOTALS) (mg/kg)								
LEAD	1000	3900	806	831	801	337	258	340
TCLP (mg/L)								
LEAD	5		0.17	3.8	13.1	0.71	5.03	0.1 U

mg/kg = milligrams per kilogram; "mg/L" = milligrams per liter; TCLP = Toxicity Characteristic Leaching Procedure
(a) Bolded restuls indicate a detection above the reporting limit.
"U" - analyte was not detected above reporting limit shown.
Yellow highlihgted results indicate an exceedance of the applicable standard/guidance value shown.

Table 2
Tulip Molding Plastics Facility (Site #932169)
IHWS Investigation
Soil Sampling Results
VOCs SVOCs

Analytes	NYSDEC 6NYCRR Part 375 SCOs (b)		SB-008									
	Commercial	Industrial	(1 to 2')		(5 to 6')		(9 to 10')		(9 to 10') DUP			
SVOCs (µg/kg)												
2-Methylnaphthalene	NE	NE	420	U	130000	D	420	U	5400		E	
ACENAPHTHENE	500,000	1,000,000	420	U	63000	D	820		3900			
ACENAPHTHYLENE	500,000	1,000,000	420	U	2700		420	U	400		U	
ANTHRACENE	500,000	1,000,000	420	U	41000	D	420	U	3300			
BENZO(A)ANTHRACENE	5,600	11,000	420	U	8100		420	U	1000			
BENZO(A)PYRENE	1,000	1,100	420	U	4500		420	U	550			
BENZO(B)FLUORANTHENE	5,600	11,000	420	U	4000		420	U	510			
BIPHENYL (DIPHENYL)	NE	NE	420	U	14000		420	U	1400			
CARBAZOLE	NE	NE	420	U	4100		420	U	400		U	
CHRYSENE	56,000	110,000	420	U	8000		420	U	1000			
DIBENZOFURAN	NE	NE	420	U	8000		420	U	760			
FLUORANTHENE	500,000	1,000,000	420	U	20000		420	U	2700			
FLUORENE	500,000	1,000,000	420	U	59000	D	610		3800			
NAPHTHALENE	500,000	1,000,000	420	U	130000	D	920		5400		E	
PHENANTHRENE	500,000	1,000,000	420	U	140000	D	830		8400		E	
PYRENE	500,000	1,000,000	420	U	38000	D	420	U	3400			
VOCs (µg/kg)												
ACETONE	500,000	1,000,000	6.6		180		81		97			
ETHYLBENZENE	390,000	780,000	6.2	U	290		6.1	U	22			
Isopropylbenzene (Cumene)	NE	NE	6.2	U	84		9.4		24			
m,p-XYLENES	500,000	1,000,000	12	U	310		12	U	12		U	
o-XYLENE	500,000	1,000,000	6.2	U	270		6.1	U	13			

Values in bold indicate a detection or estimated detection.
U = Not detected at reporting limit shown; J = Estimated value below reporting limit. NS = Not Sampled; NE = Standard Not Established
E = Concentration exceeded the calibration range. D = Concentration is the result of a dilution.
Red shaded values indicate an exceedance of the Part 375 Commercial and Industrial Use SCO
Green shaded values indicate an exceedance of the Part 375 Commercial Use SCO

Table 3
Tulip Molding Plastics Facility (Site #932169)
IHWS Investigation
Groundwater Sampling Results
All Analytes

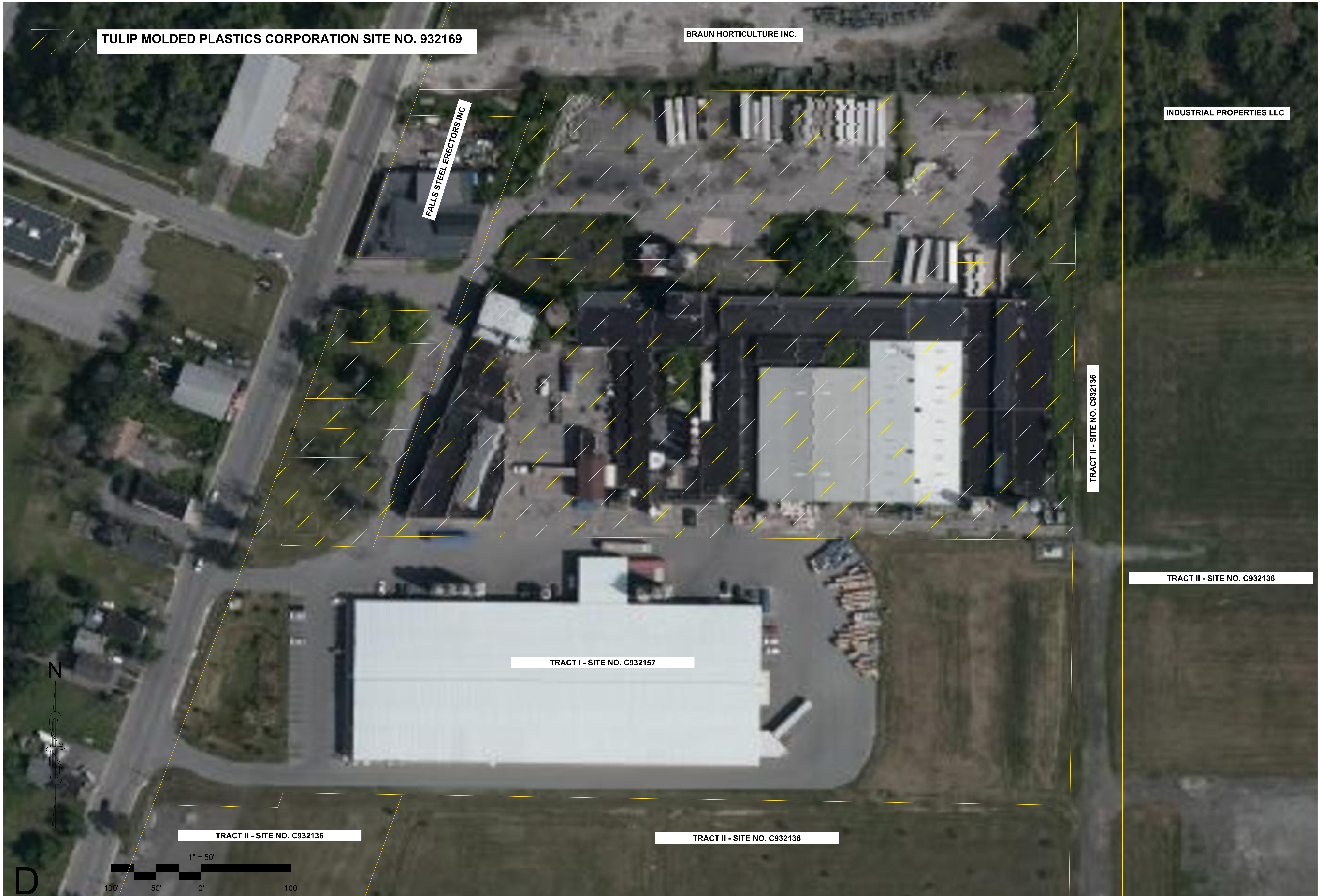
Analytes	New York State Groundwater Standards and Guidance Values (June 1998)	MW-1				MW-2				MW-3					
		8/19/2011 (a)		9/23/2020		8/19/2011 (a)		9/23/2020		8/19/2011 (a)		9/23/2020		9/23/2020 (DUP)	
Metals (TOTALS) (ug/L)															
ALUMINUM	NE	-		5680				13400				100	U	100	U
ANTIMONY	3	-		60	U			60	U			60	U	60	U
ARSENIC	25	10	U	21		10	U	10	U	10	U	10	U	10	U
BARIUM	1000	66		144		21		105		22		38		38	
BERYLIUM	NE	-		3	U			3	U			3	U	3	U
CADMIUM	5	1	U	5	U	0.39	J	5	U	1	U	5	U	5	U
CALCIUM	NE	-		73400				569000				221000		222000	
CHROMIUM	50	2.7	J	10	U	1.5	J	15		0.87	J	10	U	10	U
COBALT	5	-		50	U			50	U			50	U	50	U
COPPER	200	-		20	U			20	U			20	U	20	U
IRON	300	-		5040				15500				110		110	
LEAD	25	5	U	50	U	5	U	57		4.8	J	50	U	50	U
MAGNESIUM	35000	-		31400				68900				9900		10000	
MANGANESE	300	-		404				3630				83		86	
MERCURY	0.7	0.2	U	0.2	U	0.2	U	0.2	U	0.2	U	0.2	U	0.2	U
NICKEL	100	-		40	U			40	U			40	U	40	U
POTASSIUM	NE	-		3300				7200				4800		4800	
SELENIUM	10	15	U	10	U	15	U	10	U	15	U	10	U	10	U
SILVER	50	3	U	10	U	3	U	10	U	3	U	10	U	10	U
SODIUM	20000	-		86800				307000				58100		58900	
THALLIUM	0.5	-		10	U			15				10	U	10	U
VANADIUM	NE	-		50	U			50	U			50	U	50	U
ZINC	2000	-		20	U			97				53		53	

Table 3
Tulip Molding Plastics Facility (Site #932169)
IHWS Investigation
Groundwater Sampling Results
All Analytes

Analytes	New York State Groundwater Standards and Guidance Values (June 1998)	MW-1				MW-2				MW-3					
		8/19/2011 (a)		9/23/2020		8/19/2011 (a)		9/23/2020		8/19/2011 (a)		9/23/2020		9/23/2020 (DUP)	
SVOCs (ug/L)															
NAPHTHALENE	10			**16**				10	U			9.1	U	10	U
VOCs (ug/L)															
1,1-DICHLOROETHENE	5	1	U	5	U	1.3		5	U	1	U	5	U	5	U
ACETONE	50	3.6	J	10	U	3.1	J	10	U	10	U	10	U	10	U
BENZENE	1	1	U	5	U	1	U	5	U	0.55	J	5	U	5	U
CARBON DISULFIDE	60	2.1		10	U	1.9		10	U	0.61	J	10	U	10	U
TOLUENE	5	1	U	5	U	1	U	5	U	0.56	J	5	U	5	U
TRANS-1,2-DICHLOROETHENE	5	1	U	5	U	3.9		5	U	1	U	5	U	5	U
VINYL CHLORIDE	2	1	U	5	U	**2.4**		5	U	1	U	5	U	5	U
TRICHLOROETHENE (TCE)	5	1	U	5	U	**120**		**39**		1	U	5	U	5	U
CIS-1,2-DICHLOROETHENE	5	1	U	5	U	**19**		**11**		1	U	5	U	5	U

a/Groundwater sampling restults from August 2011 Phase II ESA conducted by AECOM on behalf of Tulip Corporation. "-" indicate no data was provided for this compound in Phase II table.
Values in bold indicate a detection or estimated detection.
U = Not detected at reporting limit shown; J = Estimated value below reporting limit. NS = Not Sampled; NE = Standard Not Established
Green shaded values indicate an exceedance of the Class GA Standard shown.

Figures



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Niagara Falls, NY
Site No. 932169

FIGURE 01

SITE LOCATION

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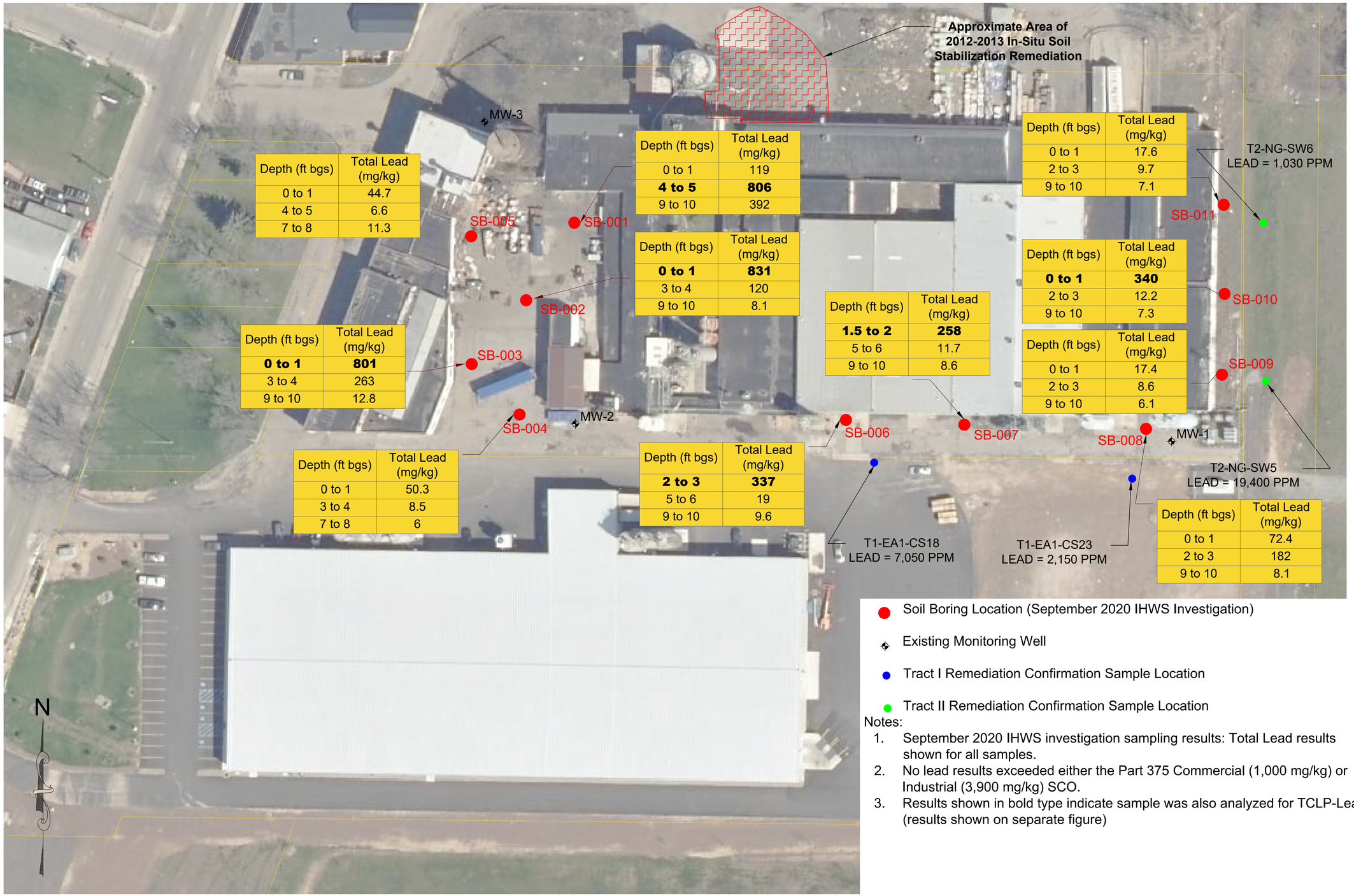
FIGURE 1



Depth (ft bgs)	Total Lead (mg/kg)
0 to 1	44.7
4 to 5	6.6
7 to 8	11.3

Depth (ft bgs)	Total Lead (mg/kg)
0 to 1	119
4 to 5	**806**
9 to 10	392

Depth (ft bgs)	Total Lead (mg/kg)
0 to 1	17.6
2 to 3	9.7
9 to 10	7.1

Depth (ft bgs)	Total Lead (mg/kg)
0 to 1	**831**
3 to 4	120
9 to 10	8.1

Depth (ft bgs)	Total Lead (mg/kg)
0 to 1	**340**
2 to 3	12.2
9 to 10	7.3

Depth (ft bgs)	Total Lead (mg/kg)
1.5 to 2	**258**
5 to 6	11.7
9 to 10	8.6

Depth (ft bgs)	Total Lead (mg/kg)
0 to 1	**801**
3 to 4	263
9 to 10	12.8

Depth (ft bgs)	Total Lead (mg/kg)
0 to 1	17.4
2 to 3	8.6
9 to 10	6.1

Depth (ft bgs)	Total Lead (mg/kg)
0 to 1	50.3
3 to 4	8.5
7 to 8	6

Depth (ft bgs)	Total Lead (mg/kg)
2 to 3	**337**
5 to 6	19
9 to 10	9.6

Depth (ft bgs)	Total Lead (mg/kg)
0 to 1	72.4
2 to 3	182
9 to 10	8.1

- Soil Boring Location (September 2020 IHWS Investigation)
- Existing Monitoring Well
- Tract I Remediation Confirmation Sample Location
- Tract II Remediation Confirmation Sample Location

Notes:

1. September 2020 IHWS investigation sampling results: Total Lead results shown for all samples.
2. No lead results exceeded either the Part 375 Commercial (1,000 mg/kg) or Industrial (3,900 mg/kg) SCO.
3. Results shown in bold type indicate sample was also analyzed for TCLP-Lead (results shown on separate figure)

1" = 25'

50' 25' 0' 50'

D

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FIGURE 02

IHWS INVESTIGATION
SOIL SAMPLING RESULTS SUMMARY
TOTAL LEAD

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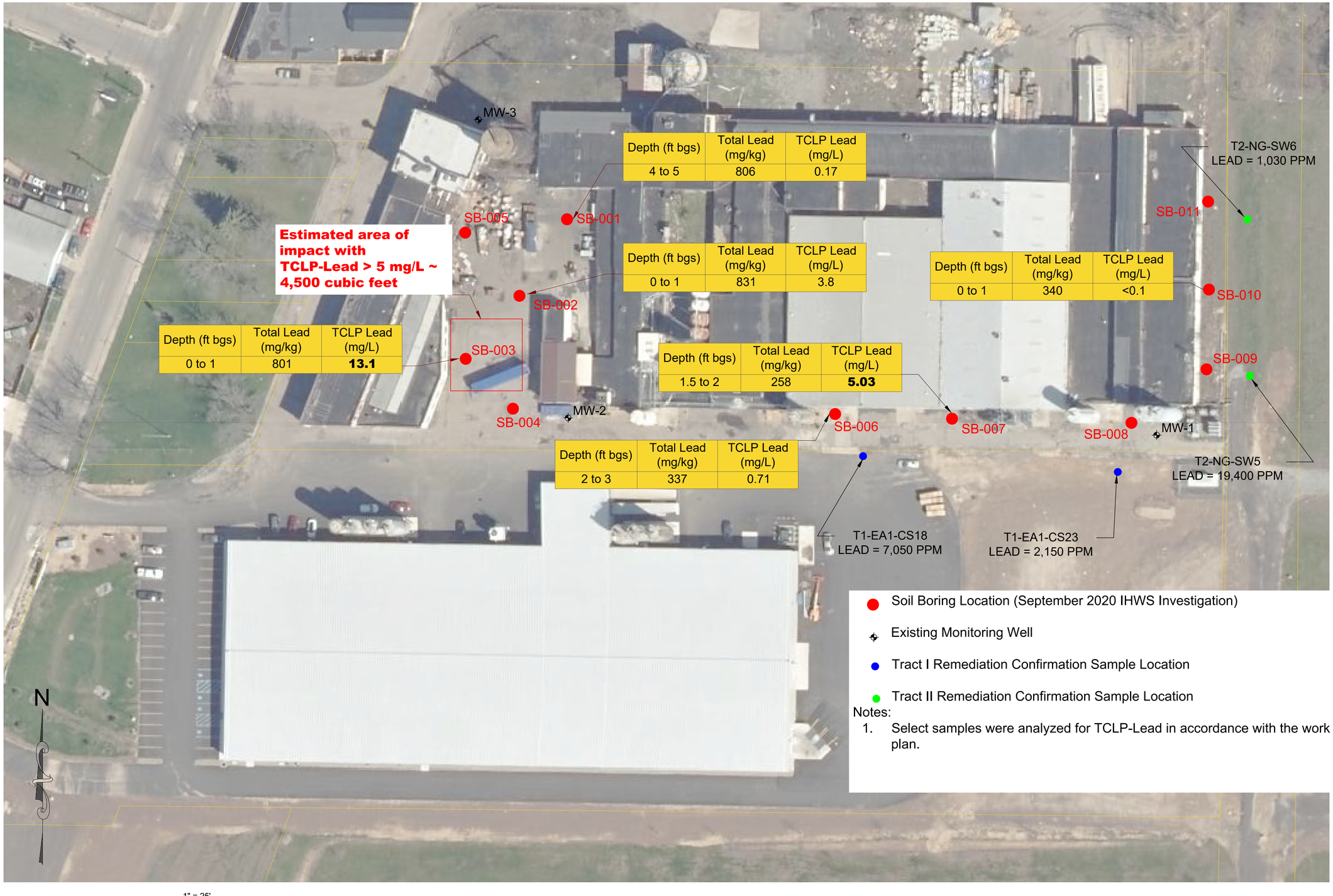
FIGURE 2



Depth (ft bgs)	Total Lead (mg/kg)	TCLP Lead (mg/L)
4 to 5	806	0.17

Depth (ft bgs)	Total Lead (mg/kg)	TCLP Lead (mg/L)
0 to 1	831	3.8

Depth (ft bgs)	Total Lead (mg/kg)	TCLP Lead (mg/L)
0 to 1	340	<0.1

Depth (ft bgs)	Total Lead (mg/kg)	TCLP Lead (mg/L)
0 to 1	801	**13.1**

Depth (ft bgs)	Total Lead (mg/kg)	TCLP Lead (mg/L)
1.5 to 2	258	**5.03**

Depth (ft bgs)	Total Lead (mg/kg)	TCLP Lead (mg/L)
2 to 3	337	0.71

- Soil Boring Location (September 2020 IHWS Investigation)
- Existing Monitoring Well
- Tract I Remediation Confirmation Sample Location
- Tract II Remediation Confirmation Sample Location

Notes:
1. Select samples were analyzed for TCLP-Lead in accordance with the work plan.

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FIGURE 02a
IHWS INVESTIGATION
SOIL SAMPLING RESULTS SUMMARY
TCLP LEAD

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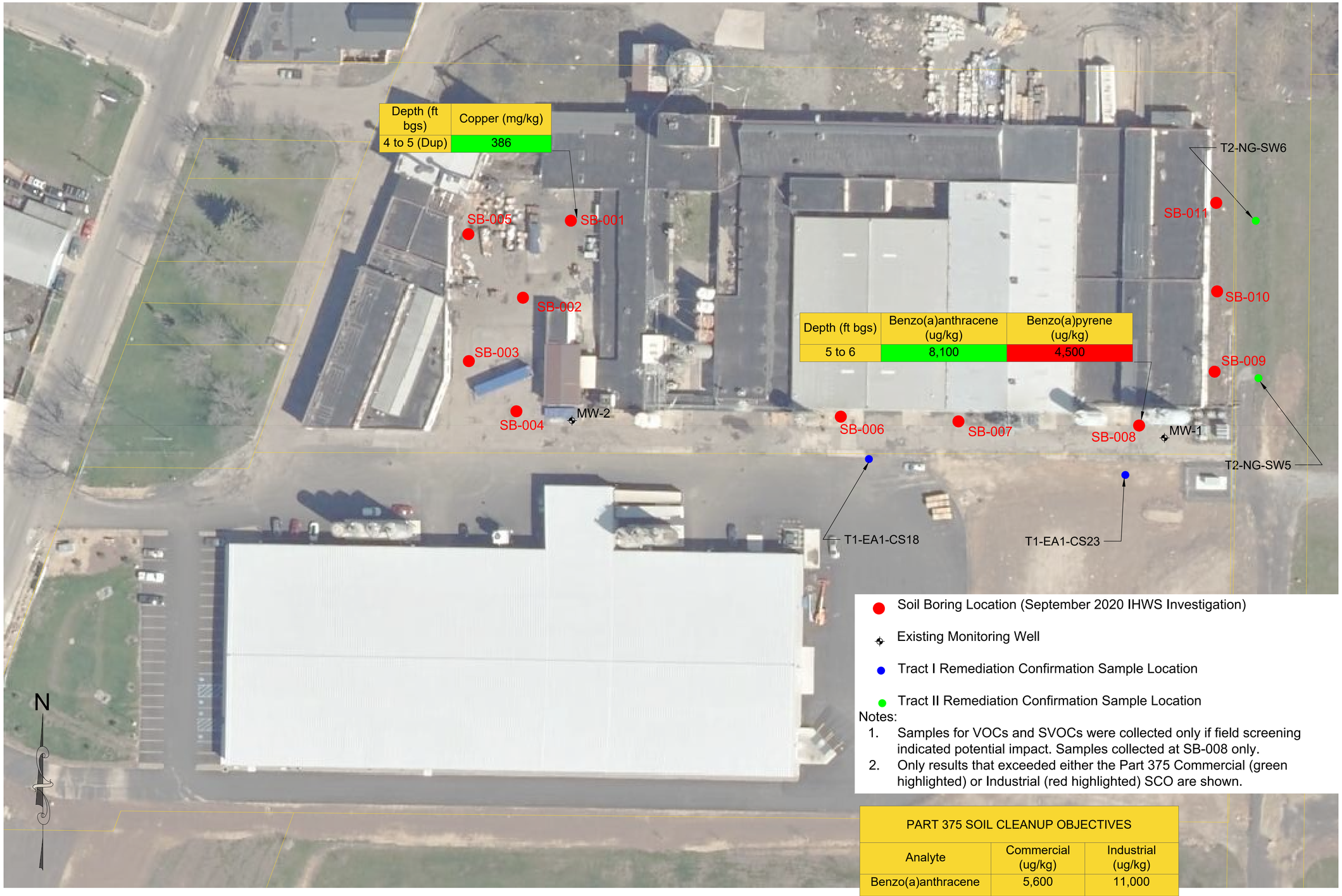
FIGURE 2a



Soil Boring Location (September 2020 IHWS Investigation)

Existing Monitoring Well

Tract I Remediation Confirmation Sample Location

Tract II Remediation Confirmation Sample Location

Notes:

1. Samples for VOCs and SVOCs were collected only if field screening indicated potential impact. Samples collected at SB-008 only.
2. Only results that exceeded either the Part 375 Commercial (green highlighted) or Industrial (red highlighted) SCO are shown.

PART 375 SOIL CLEANUP OBJECTIVES		
Analyte	Commercial (ug/kg)	Industrial (ug/kg)
Benzo(a)anthracene	5,600	11,000
Benzo(a)pyrene	1,000	1,100
Copper	270 (mg/kg)	10000 (mg/kg)

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FIGURE 03
IHWS INVESTIGATION
SOIL SAMPLING RESULTS
VOCs/SVOCs/Other Metals

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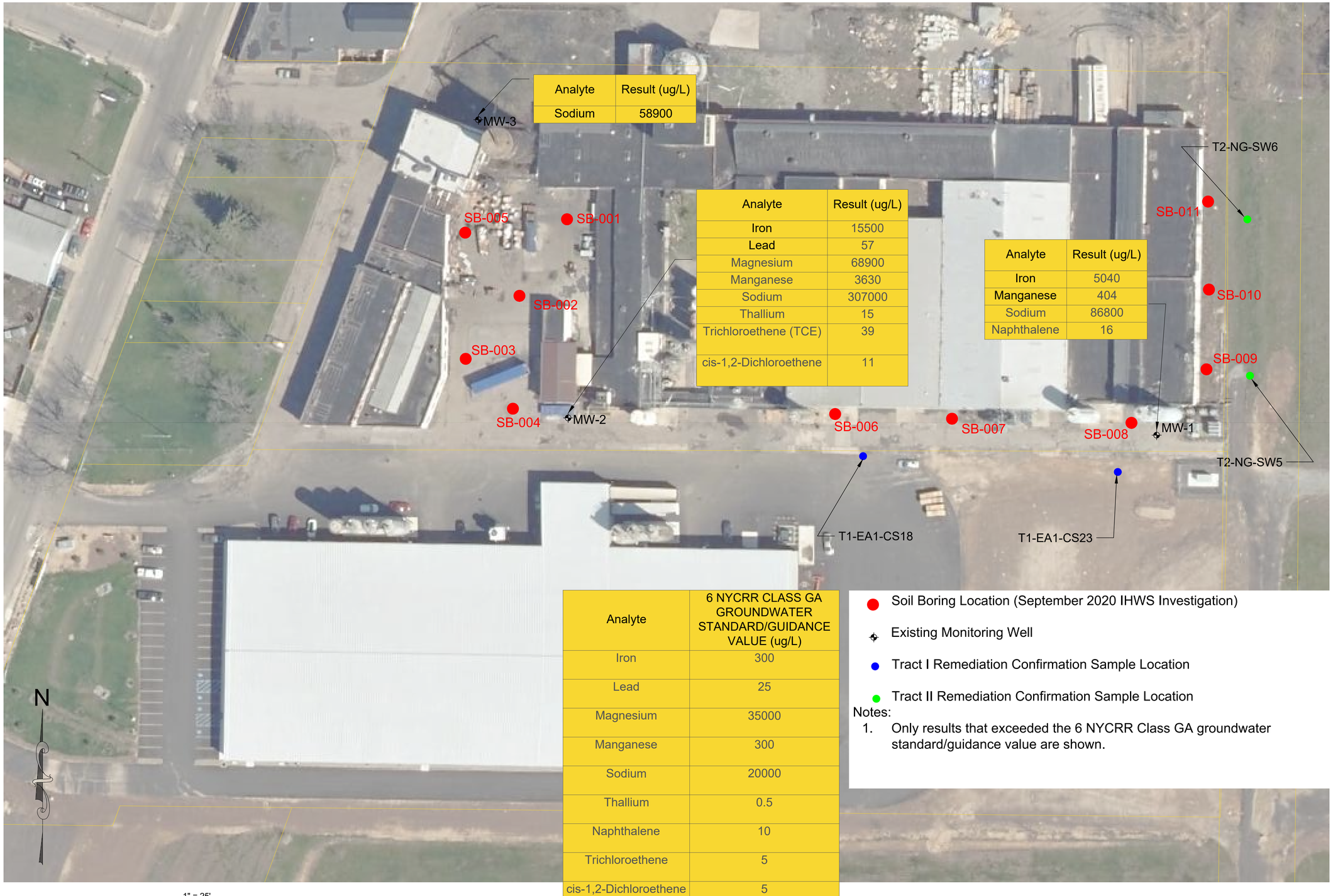
FIGURE 3



Analyte	Result (ug/L)
Sodium	58900

Analyte	Result (ug/L)
Iron	15500
Lead	57
Magnesium	68900
Manganese	3630
Sodium	307000
Thallium	15
Trichloroethene (TCE)	39
cis-1,2-Dichloroethene	11

Analyte	Result (ug/L)
Iron	5040
Manganese	404
Sodium	86800
Naphthalene	16

Analyte	6 NYCRR CLASS GA GROUNDWATER STANDARD/GUIDANCE VALUE (ug/L)
Iron	300
Lead	25
Magnesium	35000
Manganese	300
Sodium	20000
Thallium	0.5
Naphthalene	10
Trichloroethene	5
cis-1,2-Dichloroethene	5

- Soil Boring Location (September 2020 IHWS Investigation)
- Existing Monitoring Well
- Tract I Remediation Confirmation Sample Location
- Tract II Remediation Confirmation Sample Location

Notes:
1. Only results that exceeded the 6 NYCRR Class GA groundwater standard/guidance value are shown.

1" = 25'

50' 25' 0' 50'

D

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FIGURE 04

IHWS INVESTIGATION
GROUNDWATER SAMPLING RESULTS
SUMMARY

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FIGURE 4

D

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FIGURE 05

SUPPLEMENTAL SCOPING
INVESTIGATION WORK PLAN

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FIGURE 5