2013 PERIODIC REVIEW REPORT

Groundwater Monitoring and Sampling Annual Report

Roblin Steel Site
Site Number B00025
City of North Tonawanda

February 2014

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GROUNDWATER MONITORING AND SAMPLING ANNUAL REPORT

ROBLIN STEEL SITE
SITE NUMBER B00025

CITY OF NORTH TONAWANDA
NEW YORK

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TABLE OF CONTENTS

		Page
SECTION 1 - SITE BACKGROUND		1
1.1	Site Location	1
1.2	Site History	1
1.3	Regulatory History	2
1.4	Remediation Activities	3
SECTION 2 - GROUNDWATER MONITORING ACTIVITIES		5
2.1	Site Hydrology	5
2.2	Monitoring Requirements	5
2.3	Groundwater Monitoring	5
2.4	2013 Groundwater Monitoring	6
SECTION 3 - GROUNWATER MONITORING RESULTS		8
SECTION 4 - SOIL MANAGEMENT PLAN		9
4.1	Description of Institutional and Engineering Controls	9
4.2	Nature and Extent of Contamination	9
4.3	Contemplated Use	10
4.4	Purpose and Description of Surface Cover System	10
4.5	Management of Soils/Fill and Long Term Maintenance	10
4.6	Excavated and Stockpiled Soil/Fill Disposal	12
4.7	Subgrade Materials	13
4.8	Site Usage 2009 - 2013	14
SECTION 5 - CONCLUSIONS		15

LIST OF FIGURES

Figure No.	
1	Site Location Map

LIST OF TABLES

Table No.	
1	Volatile Organic Compounds
2	Semi Volatile Organic Compounds
3	PCBs
4	Metals

LIST OF APPENDICES

Appendix	
A	Groundwater Monitoring Program Revision
B	Institutional & Engineering Controls Certification Form
C	Sampling and Well Logs
D	Analytical Test Results
E	Data Usability Reporting
F	Site Development

SECTION 1 - SITE BACKGROUND

1.1 Site Location

The Roblin Steel site was an inactive steel processing manufacturing facility in the City of North Tonawanda, Niagara County, NY. The site is bounded by East Avenue on the north, Oliver Street on the east, and Eighth Avenue on the south, and the Conrail-Erie Lackawanna railroad tracks on the west. One building, located on a 4.9-acre parcel adjacent to the northwest part of the site, represents an active facility occupied by Armstrong Pumps since 1985. In 1997, through tax delinquency, the City of North Tonawanda obtained the former Roblin Steel facility. A site location map is presented on Figure 1.

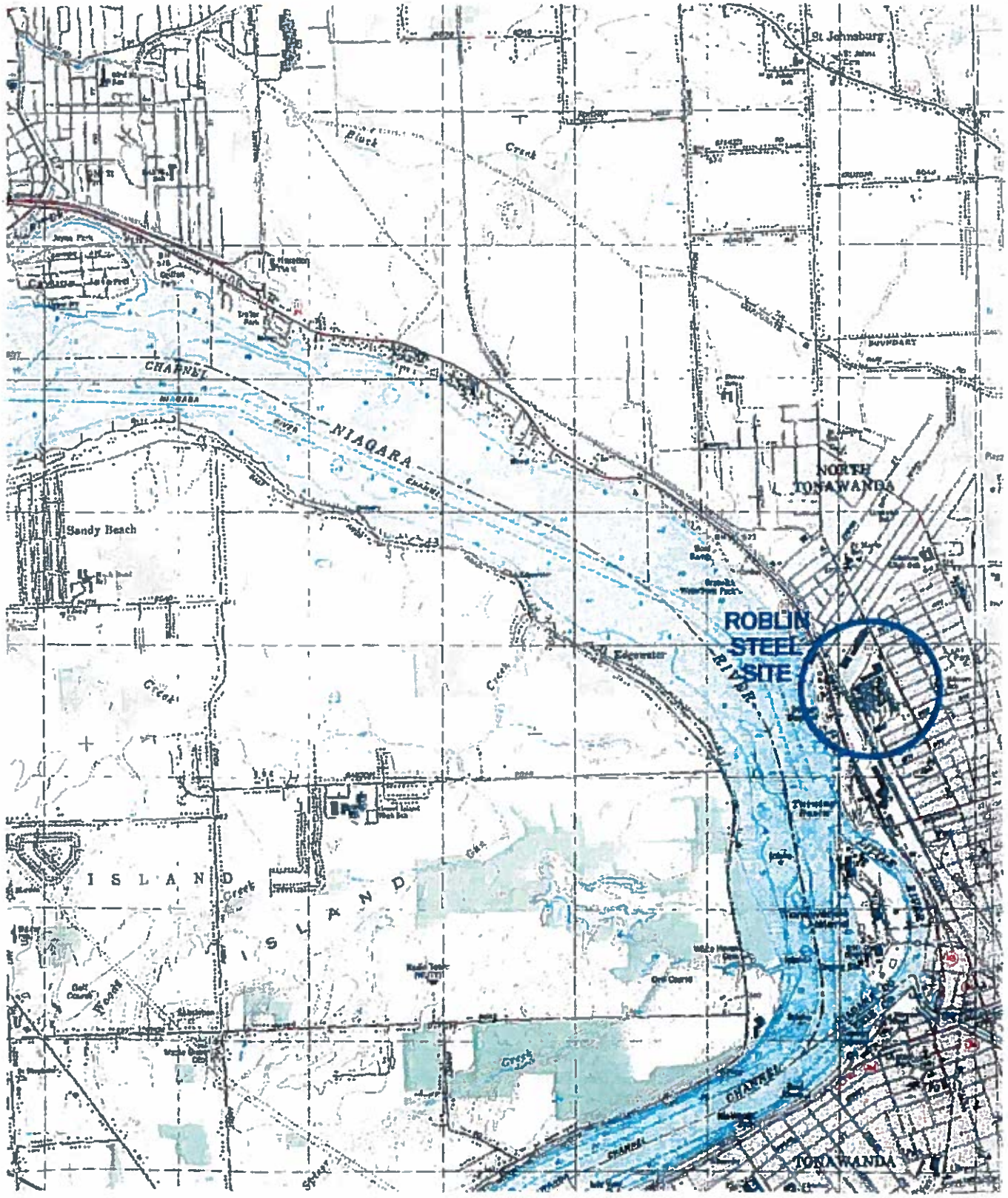
1.2 Site History

Manufacturing operations were reported to have begun at the site in 1918, when the Buffalo Bolt Company owned the property. Roblin Seaway Industries, Inc. (a precursor to Roblin Industries, Inc.) purchased the manufacturing plant and property in 1961. From 1977 to 1987, Confer Plastics leased two long, narrow buildings on the west side of the site. In 1985, Roblin Industries sold a 4.9-acre portion of the site and the building on that portion of the site to Armstrong Pumps, Inc. In 1987, Roblin Industries declared bankruptcy, and all activities ceased at the site. In 1989, the property owned by Roblin Industries was divided. As a result of foreclosure for back taxes, the City of North Tonawanda assumed ownership of 11.5 acres of the former Roblin Steel site in 1992. At that time, Banac Enterprises owned the remaining 11.8 acres of the Roblin site. In 1995, this portion of the site was being used as an automobile salvage operation. The City of North Tonawanda currently owns the 11.8-acre parcel previously owned by Banac Enterprises, also acquired through foreclosure actions.

During the time that Roblin Industries owned the site from 1961 to 1987, operations taking place in the buildings included hot rolling of steel rods and bars, sulfuric acid pickling of steel coils, lime and oil coating of steel coils, annealing of steel coils, wire drawing and melting, and casting of nickel. Wastes were regularly staged near the center of the southern portion of the site prior to being sent off site for disposal. Wastes generated at the site included sludge from the phosphate tank, iron oxide scale, lime, spent pickle liquor, and waste oil.

Most of the site consisted of empty buildings in various states of disrepair and overgrown undeveloped property. Confer Plastics previously occupied two buildings on the western portion of the site, both of which had been burned prior to remediation efforts. The location of one of these buildings was

ROBLIN STEEL SITE
CITY OF NORTH TONAWANDA, NEW YORK
USGS QUAD: TONAWANDA WEST



5/31/01

Figure 1

identified only by the presence of brick piles, while the other building still had sections of walls standing.

The western portion of the rolling mill building that remained from the demolition project completed in 2000, contained flooring which consisted of stained, contaminated wood blocks. The block flooring had lifted off from the sub floor due to moisture. Trenches in the building appeared to be full of sediment and sludge. A soil floor comprised the eastern side of the building. Concrete-lined trenches were present in this portion of the building. Concrete-lined pickling tanks were present in the northwest portion of the mill building.

Waste piles, some from the previous operations at the site (identified as slag and scale during previous site investigations), and some containing building rubble/materials, were present on the western and southern sides of the site. Drums of various materials were present outside, near the southeast corner of the former mill building, and inside the large brick building, located in the center of the site. Transformer cases were adjacent to the southeast side of the former mill building. Most of the area not covered by buildings or heavy vegetative cover contained areas of black, stained soil. A concrete reservoir from a former quenching pond was located in the approximate center of the site.

1.3 Regulatory History

In 1998, Stearns & Wheler, LLC was contracted by the City of North Tonawanda, New York to provide engineering services and perform a Site Investigation/Remedial Alternatives Report (SI/RAR). The SI report and the preliminary RAR report were completed in 1999. In 2002, Stearns & Wheler developed a phased project approach for the site remediation based on the 1999 SI/RAR findings and earlier investigation completed in 1995 by the New York State Department of Environmental Conservation (NYSDEC). Based on the conclusions of the Site Investigation Report, Areas of Concern (AOC) were identified. The Remedial Alternatives Report addressed, defined and selected the most feasible remedial alternatives for the areas of concern.

The project was divided into two separate contracts due to the condition of the building ruins. Expedited demolition activities under emergency circumstances was required at the site responding to building conditions in close proximity to the adjacent, occupied business, Armstrong Pumps. The unsafe building conditions were the result of a fire in September 2002, which caused concern to the insurance carrier for Armstrong Pumps. Therefore, demolition of the site buildings and removal of

asbestos containing materials was completed under the Phase I Contract. Remediation of site contamination and concrete foundation demolition was completed as Phase II.

1.4 Remediation Activities

Several waste removal and disposal operations have taken place since manufacturing operations ceased at the site. In 1990, a drum removal and disposal operations were conducted. In 1992, a transformer was cleaned out and PCB-impacted soil from the area surrounding the transformer pad was excavated and disposed off site. The former wire mill building was demolished in 2000 so that the steel in the structure could be salvaged. An asbestos survey was completed prior to demolition.

In 2001, one (1) 2,000-gallon and two (2) 5,000-gallon steel storage tanks (USTs) were removed from the site. In addition, one (1) 10,000-gallon fiberglass storage tank was excavated and demolished on-site. Approximately, 30 CY of contaminated soil related to the UST removal remained on site for later removal and disposal off-site during the Site remediation activities scheduled for 2003 to 2004. Underground storage tank removal and disposal activities can be referenced in the Tank Closure Report dated May 2001.

The City received a "brownfields" redevelopment grant through the 1996 New York State Clean Water/Clean Air Bond Act to facilitate the rehabilitation of the site. Site buildings were condemned by the City of North Tonawanda due to the deteriorated condition of building structure which posed a safety concern to the public. Immediate demolition of site buildings was required due to structural damage and the close proximity of the existing adjacent business known as Armstrong Pumps. This work was performed under Phase I construction and completed in 2003. Phase I construction also involved remediation of Areas of Concern.

Phase II was undertaken in 2004. Final completion occurred during June 2005. Phase II work included the remediation of the site as recommended in the Remedial Alternatives Report (RAR), Proposed Remedial Action Plan (PRAP) and Record of Decision (ROD). Phase II construction involved remediation of the impacted soil and remediation of the former quench pond. Once the site was remediated, the site can be returned to beneficial use without posing an unacceptable risk to new occupants, neighbors, or the environment in the vicinity of the site.

SECTION 2 - GROUNDWATER MONITORING ACTIVITIES

The Monitoring Plan will include the necessary actions required to ready and maintain the site for monitoring once remedial construction is complete. The Monitoring Plan will be implemented once both remediation phases identified as Phases I and II are complete.

2.1 Site Hydrogeology

Results of groundwater sampling indicate that constituents in the soil/fill material have slightly impacted groundwater quality with volatile organic compounds (VOCs). Groundwater in the southeast corner of the site has been impacted with low concentrations of chlorinated VOCs. Groundwater in this portion of the site presumably flows toward the combined sewer line that runs down the west side of Oliver Street.

2.2 Monitoring Requirements

Annual monitoring will be performed on groundwater samples for a minimum period of 30 years or at reduced frequency and period as approved by NYSDEC. Groundwater monitoring will initially be conducted after the remediation has been completed and thereafter on an annual basis. Methods used will be consistent with NYSDEC requirements. The extent and frequency of the sampling and analysis will be evaluated with the NYSDEC after the first year and then every five years to determine if sampling points or analytes can be dropped from the monitoring program. The NYSDEC will be notified in advance of each sampling event and summary reports of the data will be submitted to NYSDEC for review. Annual summary reports will be submitted to the NYSDEC.

2.3 Groundwater Monitoring

The groundwater monitoring system will be maintained and sampled during the post-remediation period. The extent and frequency of the sampling and analysis will be evaluated by NYSDEC periodically on an annual basis to determine if the sampling points or analytes should be changed. The NYSDEC will detail changes as appropriate after reviewing the annual summary reports. Under the approved Site Management Plan dated March 2007, the following groundwater monitoring locations were to be sampled and designated as GW-3S, GW-3, GW-11S, GW-12S, and GW-18S and tested for Volatile Organic Compounds (VOCs) under EPA Method 8260 TCL.

The groundwater monitoring program was modified as proposed in the City of North Tonawanda's letter dated January 7, 2010 and presented in Appendix A. The City proposed to the NYSDEC to

sample groundwater from one location at MW-3S. Analytical testing will include VOCs under EPA Method 8260 TCL. The NYSDEC has approved this change. As reported in the Site Investigation Report, impact to groundwater was localized detecting concentrations of volatile compounds in groundwater from only monitoring well MW-3S. Volatile concentrations were detected above groundwater standards in groundwater sampled during the Site Investigation dated 1999 and as presented in Appendix A on Table 3. Groundwater from all other monitoring wells sampled was reported at non-detectable results or as estimated concentrations below groundwater standards.

Since the Site Management Plan has been finalized, some changes have occurred to the site. All monitoring wells as listed in the Site Management Plan except for MW-11S have been reported from a recent site inspection as either damaged or missing. The City began site development in March 2010 which includes the 10th Avenue roadway extension with water and sewer utilities. The proposed roadway and 8-inch diameter waterline conflicted with monitoring well MW-3S location. As a result of this conflict, the City requested to the NYSDEC to replace monitoring well MW-3S and move its location approximately 65-feet to the north of its present location as stated in a letter dated January 7, 2010 and presented in Appendix A. Well relocation required drilling and installation of a new monitoring well. The NYSDEC approved this change.

However, during construction of the 10th Avenue roadway extension, the waterline was moved to the other side of the street which allowed for new monitoring well MW-3S to be installed at approximately the same location as the original monitoring well MW-3S location. The location of monitoring well MW-3S is presented in Appendix A.

Decommissioning of existing site monitoring wells was completed in 2010. During the drilling and installation of monitoring well MW-3S, the well installer decommissioned (8) existing monitoring wells.

2.4 2013 Groundwater Monitoring

The 2013 monitoring program at the Roblin Steel site consisted of one annual sampling event. Groundwater was sampled from monitoring well MW-3S on July 24, 2013. This sampling event represents the 3rd event of the Roblin Steel groundwater monitoring program.

Groundwater sampling of monitoring MW-3S was collected using low-flow purging and sampling techniques. Prior to sampling, the monitoring well was purged using a disposable bailer. Groundwater parameters of pH, conductance, dissolved oxygen (DO), temperature, and oxidation-

reduction potential (ORP) were recorded. After the field parameters were recorded, groundwater sampling was collected with a disposable bailer into sample containers provided by the testing laboratory. Groundwater elevation data was recorded. Purge water generated from monitoring well MW-3S was discharged to the ground.

Several quality control samples, including a trip blank and a field duplicate were collected during the sampling event. Samples were delivered under a chain of custody to ESC Lab Sciences for analysis of VOCs by USEPA SW-846 Method 8260. The specific sampling protocol to be used, including sample preservation techniques, QA/QC objectives, a description of chain-of-custody documentation, and analytical parameters are included in the approved Site Management Plan.

SECTION 3 - GROUNDWATER MONITORING RESULTS

This section includes the analytical test results of the 2013 annual groundwater sampling event and is presented in Table 1. Included in this section are descriptions of the identification and distribution of constituents present in groundwater, and a comparison of historical data. Constituents are compared to the applicable NYSDEC Division of Water Technical and Operational Guidance Series (TOGS 1.1.1) Groundwater Standards and Guidance Values.

Analytical testing from the 2013 sampling event detected cis-1,2-dichloroethene at concentrations that exceeded the groundwater standards. Trend analysis from the comparison of site historical data dated 1999, 2010, 2011, 2012, and 2013 analytical test results showed decreasing concentrations of cis-1,2-dichloroethene.

Analytical testing from the 2013 sampling event detected concentrations of methyl-t-butyl ether (MTBE), tetrachloroethene, and trichloroethene at concentrations estimated below detection limits and the groundwater standards. Trend analysis from the comparison of site historical data dated 1999, 2010, 2011, 2012, and 2013 analytical test results showed concentrations of methyl-t-butyl ether (MTBE) decreased from 2010 to 2013.

Concentrations of trichloroethene decreased from 1999 to 2012. Concentrations of trichloroethene detected in 2013 remained as reported in 2012 as estimated values.

Total VOCs detected in groundwater decreased from 1999 to 2013 from 158 ug/l to 13 ug/l.

TABLE 1
MONITORING WELL MW-3S
VOLATILE ORGANIC ANALYTICAL TEST RESULTS
ROBLIN STEEL SITE

Volatile Compounds	NYSDEC TOGS 1.1.1 Water Quality Standards[1]	Units	09/29/99	07/01/10	07/21/11	07/25/12	07/24/13
1,1,1-Trichloroethane	5	µg/L	U	U	U	U	U
1,1,2,2-Tetrachloroethane	5	µg/L	U	U	U	U	U
1,1,2-Trichlo-1,2,2-trifluoroethane	5	µg/L	-	U	U	U	U
1,1,2-Trichloroethane	1	µg/L	U	U	U	U	U
1,1-Dichloroethane	5	µg/L	U	U	U	U	U
1,1-Dichloroethene	5	µg/L	U	U	U	U	U
1,2,3-Trichlorobenzene	5	µg/L	-	U	U	U	U
1,2,4-Trichlorobenzene	5	µg/L	-	U	U	U	U
1,2-Dibromo-3-Chloropropane DBCP	0.04	µg/L	-	U	U	U	U
1,2-Dibromoethane (EDB)	NE	µg/L	-	U	U	U	U
1,2-Dichlorobenzene	3	µg/L	-	U	U	U	U
1,2-Dichloroethane	0.6	µg/L	U	U	U	U	U
1,2-Dichloropropane	5	µg/L	U	U	U	U	U
1,3-Dichlorobenzene	3	µg/L	-	U	U	U	U
1,4-Dichlorobenzene	3	µg/L	-	U	U	U	U
2-Hexanone	50	µg/L	U	U	U	U	U
Acetone	50	µg/L	UJ	**29 J**	U	U	U
Benzene	1	µg/L	U	U	U	U	U
Bromoform	50	µg/L	U	U	U	U	U
Bromomethane	5	µg/L	UJ	U	U	U	U
Bromodichloromethane	50.0	µg/L	U	U	U	U	U
Carbon disulfide	60	µg/L	U	U	U	U	U
Carbon tetrachloride	5	µg/L	U	U	U	U	U
Chlorobenzene	5	µg/L	U	U	U	U	U
Chloroethane	5	µg/L	UJ	U	U	U	U
Chloroform	7	µg/L	U	U	U	U	U
Chloromethane	NE	µg/L	U	U	U	U	U
cis-1,2-Dichloroethene	5	µg/L	**62**	**28**	**23**	**21**	**11**
cis-1,3-Dichloropropene	0.40	µg/L	U	U	U	U	U
Cyclohexane	NE	µg/L	-	**0.31J**	U	U	U
Dibromochloromethane	50	µg/L	U	-	-	-	-
Dichlorobromoethane	NE	µg/L	-	U	U	U	U
Dichlorodifluoromethane	5	µg/L	-	U	U	U	U
Ethylbenzene	5	µg/L	U	U	U	U	U
Isopropylbenzene	5	µg/L	-	U	U	U	U
Methyl acetate	NE	µg/L	-	U	U	U	U
Methyl Ethyl Ketone	50	µg/L	U	U	U	U	U
Methylcyclohexane	NE	µg/L	-	U	U	U	U
Methylene chloride	5	µg/L	U	U	U	U	U
Methyl-t-Butyl Ether (MTBE)	10	µg/L	U	**4.9J**	**1.7**	**1.1**	**0.42J**
m,p-Xylene	5	µg/L	U	U	U	U	U
o-Xylene	5	µg/L	U	U	U	U	U
Styrene	5	µg/L	U	UJ	UJ	UJ	UJ
Tetrachloroethene	5	µg/L	**40**	U	U	U	**0.91J**
Toluene	5	µg/L	U	U	U	U	U
Total Xylenes	5	µg/L	U	U	U	U	U
trans-1, 2-Dichloroethene	5	µg/L	U	**0.43J**	U	U	U
trans-1,3-Dichloropropene	0.4	µg/L	U	U	U	U	U
Trichloroethene	5	µg/L	**56**	**0.34J**	**1.5**	**0.64J**	**0.75J**
Trichlorofluoromethane	5	µg/L	-	U	U	U	U
Vinyl Chloride	2	µg/L	U	**0.74J**	**0.42J**	U	U
Total VOCs		µg/L	158	64	27	23	13
Total VOCs		mg/L	0.158	0.064	0.027	0.023	0.013

Notes:

1. New York State Department of Environmental Conservation (NYSDEC) Technical and Operational Guidance Series (TOGS) 1.1.1: Ambient Water Quality Standards and Guidance Values (µg/L)

Bolded concentrations indicated the analyte was detected.

Bolded and shaded concentrations indicate equal to or exceedance of TOGS 1.1.1 criteria.

NE = NYSDEC TOGS 1.1.1 water quality standard not established.

U = The analyte was analyzed for but not detected. The associated value is the analyte quantitation limit.

J = The analyte was positively identified; however, the associated numerical value is an estimated concentration only.

- = The analyte was not sampled for.

SECTION 4 - SOIL MANAGEMENT PLAN

The objective of this Soils Management Plan (SMP) is to set guidelines for management of soil material during any future activities which would breach the cover system at the site. This SMP addresses environmental concerns related to soil management and has been reviewed and approved by the New York State Department of Environmental Conservation (NYSDEC).

4.1 Description of Institutional and Engineering Controls

Institutional and engineering controls are required by the NYSDEC Record of Decision (ROD) dated February 2002 and include the environmental easement for future redevelopment and ownership of the site. The approved soils management plan addresses the excavation procedures for the remaining soils during future redevelopment. The soil management plan includes soil management, characterization and disposal of excavated soils in accordance with the applicable NYSDEC regulations.

The ROD and environmental easement require the imposition of a deed restriction that requires compliance with the approved soils management plan and the future use of groundwater from the site. Deed restrictions are to be instituted that prohibit the installation of potable wells at the site. Any future use of groundwater at the site is prohibited. Annually, the future owners will be required to certify to the NYSDEC that the implemented remedy has been maintained in accordance with the soils management plan.

The site owner as required by the NYSDEC has included the signed Institutional & Engineering Controls Certification Form as presented in Appendix B.

4.2 Nature and Extent of Contamination

During the site investigation activities, six areas of impacted soil were identified. These six impacted soil areas were excavated, removed and disposed off-site during the site remediation. Impacted soils were sampled and categorized to delineate the extent of the contamination for waste characterization for off-site disposal. The impacted soils were excavated to a depth of 1-foot as defined in the NYSDEC issued Record of Decision.

Five impacted soil areas contained semi-volatile chemical compounds which included polycyclic aromatic hydrocarbons (PAHs) and metals. The removed impacted soils were confined to surficial soils. Any visual soil impacted as defined as darken, oily materials beyond the depth of the first 12-

inches were also removed. The potential exposure pathways include inhalation, absorption, ingestion and physical contact. Health effects from exposure to these chemical compounds are skin and respiratory irritants.

The sixth impacted soil area contained poly chlorinated byphenyls (PCBs), which was excavated, removed and disposed off-site to a depth ranging from 12 to 18-inches. After excavation of the PCB impacted soils, confirmatory soil samples were collected to confirm no PCB impacted soils were present. The potential exposure pathways include inhalation, absorption, ingestion and contact. Health effects from exposure to these chemical compounds are eye, skin and acne form irritants.

4.3 Contemplated Use

As part of the redevelopment project, the property has been identified for light industrial/commercial usage. Residential redevelopment will not be permitted. Deed restrictions will require compliance with the approved soil management plan. The future use of site groundwater will be prohibited.

4.4 Purpose and Description of Surface Cover System

The purpose of the surface cover system is to eliminate the potential for human contact with fill material and eliminate the potential for contaminated runoff from the property. The cover system that was used to fill the excavated impacted soil areas was 12-inches of crushed concrete that was recycled from demolished site concrete foundations. An additional 4-inches of topsoil was spread over the crushed concrete fill to provide a vegetative supporting soil cover.

4.5 Management of Soils/Fill and Long Term Maintenance

The purpose of this section is to provide environmental guidelines for management of subsurface soils/fill and the long-term maintenance of the cover system during any future intrusive work which breaches the cover system. The Soil Management Plan includes the following conditions:

- Any breach of the cover system, including for the purposes of construction or utilities work, must be replaced or repaired using an acceptable borrow source free of industrial and/or other potential sources of chemical or petroleum contamination. The repaired area must be covered with clean soil and reseeded or covered with impervious product such as concrete or asphalt, as described in Section 4, to prevent erosion in the future.

- The immediate work area that will be disturbed must be monitored for particulate air monitoring. Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the work area at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (MIE DataRAM Aerosol Monitor) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level.

  If the downwind particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind particulate levels do not exceed 150 mcg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.

  If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m^3 above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m^3 of the upwind level and in preventing visible dust migration.

- Control of surface erosion and run-off of the entire property at all times, including during construction activities. This includes proper maintenance of the vegetative cover established on the property. Maintenance of the surface drainage system located at the northeastern corner of the site at Oliver Street and East Avenue will be required.

- Site soil that is excavated and is intended to be removed from the property must be managed, characterized, and properly disposed of in accordance with NYSDEC regulations and directives.

- Soil excavated at the site may be reused as backfill material on-site provided it contains no visual or olfactory evidence of contamination, and is placed beneath a cover system component of 12-inches of clean fill from an acceptable source area.

- Any off-site fill material brought to the site for filling and grading purposes shall be from an acceptable borrow source free of industrial and/or other potential sources of chemical or petroleum contamination.

- Prior to any construction activities, workers are to be notified of the site conditions with clear instructions regarding how the work is to proceed. Invasive work performed at the property will be performed in accordance with all applicable local, state, and federal regulations to protect worker health and safety.

4.6 Excavated and Stockpiled Soil/Fill Disposal

Every effort will be made to keep excavated soils on site. Soil/fill that is excavated as part of redevelopment that can not be used as fill below the cover system will be characterized prior to transportation off-site for disposal at a permitted facility. For excavated soil/fill with visual evidence of contamination (i.e., staining or elevated PID measurements), one composite sample and a duplicate sample will be collected for each 100 cubic yards of stockpiled soil/fill. For excavated soil/fill that does not exhibit visual evidence of contamination but must be sent for off-site disposal, one composite sample and a duplicate sample will be collected for 2,000 cubic yards of stockpiled soil, and a minimum of 1 sample will be collected for volumes less than 2,000 cubic yards.

The composite sample will be collected from five locations within each stockpile. A duplicate composite sample will also be collected. PID measurements will be recorded for each of the five individual locations. One grab sample will be collected from the individual location with the highest PID measurement. If none of the five individual sample locations exhibit PID readings, one location will be selected at random. The composite sample will be analyzed by a NYSDOH ELAP-certified laboratory for pH (EPA Method 9045C), Target Compound List (TCL), semi volatile organic compounds (SVOCs), pesticides, and PCBs, and TAL metals. The grab sample will be analyzed for TCL VOCs.

Additional characterization sampling for off-site disposal may be required by the disposal facility. To potentially reduce off-site disposal requirements/costs, the owner or site developer may also choose to characterize each stockpile individually. If the analytical results indicate that concentrations exceed the standards for RCRA characteristics, the material will be considered a hazardous waste and must be properly disposed off-site at a permitted disposal facility within 90 days of excavation. If the analytical results indicate that the soil is not a hazardous waste, the material will be properly disposed off-site at a non-hazardous waste facility. Stockpiled soil cannot be transported on or off-site until the analytical results are received.

4.7 Subgrade Materials

Subgrade material used to backfill excavations or placed to increase site grades or elevation shall meet the following criteria.

- Subgrade material stockpiled on the surface for re-use must be placed on a liner material or other suitable surface to avoid the commingling of this material with clean topsoil or other surface materials. Stockpiled subgrade material should also be managed to prevent erosion and runoff of precipitation waters which may contact this material.

- Excavated on-site soil/fill which appears to be visually impacted shall be sampled and analyzed. If analytical results indicate that the contaminants, if any, are present at concentrations below the Soil Cleanup Objectives and Cleanup Levels (SCOCLs) as presented in Tables 2, 3, and 4, the soil/fill can be used as backfill on-site.

- Any off-site fill material brought to the site for filling and grading purposes shall be from an acceptable borrow source free of industrial and/or other potential sources of chemical or petroleum contamination.

- Off-site soils intended for use as site backfill cannot otherwise be defined as a solid waste in accordance with 6 NYCRR Part 360-1.2(a).

- If the contractor designates a source as "virgin" soil, it shall be further documented in writing to be native soil material from areas not having supported any known prior industrial or commercial development or agricultural use.

- Virgin soils should be subject to collection of one representative composite sample per source. The sample should be analyzed for TCL VOCs, SVOCs, pesticides, PCBs, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver. The soil will be acceptable for use as backfill provided that all parameters meet the SCOCLs.

- Non-virgin soils will be tested via collection of one composite sample per 500 cubic yards of material from each source area. If more than 1,000 cubic yards of soil are borrowed from a given off-site non-virgin soil source area and both samples of the first 1,000 cubic yards meet SCOCLs, the sample collection frequency will be reduced to one composite for every 2,500 cubic yards of additional soils from the same source, up to 5,000 cubic yards. For borrow sources greater than 5,000 cubic yards, sampling frequency may be reduced to one sample per 5,000 cubic yards, provided all earlier samples met the SCOCLs.

Table 2
SEMI-VOLATILE ORGANIC COMPOUNDS

Compound	Soil Standard (mg/kg)
Naphthalene	500
Acenapthylene	500
Acenapthene	500
Fluorene	500
Phenanthrene	500
Anthracene	500
Fluoranthene	500
Pyrene	500
Benzo (a) anthracene	5.6
Chrysene	56
Benzo (b) fluoranthene	5.6
Benzo (k) fluoranthene	5.6
Benzo (a) pyrene	1
Indeno (1,2,3-c,d) pyrene	5.6
Dibenzo (a,h) anthracene	0.56
Benzo (g,h,i) perylene	500

Note: Standards based on Restricted Use Soil Cleanup Objectives for Commercial Use (NYSDEC, effective December 14, 2006)

Table 3
PCBs

Compound	Soil Standard (ug/kg)
Aroclor 1016	1,000
Aroclor 1221	1,000
Aroclor 1232	1,000
Aroclor 1242	1,000
Aroclor 1248	1,000
Aroclor 1254	1,000
Aroclor 1260	1,000

Note: Standards based on Determination of Soil Cleanup Objectives and Cleanup Levels (NYSDEC, January 1994)

Table 4
METALS

Compound	Soil Standard (mg/kg)
Aluminum	SB
Antimony	SB
Arsenic	16
Barium	400
Beryllium	590
Cadmium	9.3
Calcium	SB
Chromium	400
Cobalt	SB
Copper	270
Iron	SB
Lead	SB*
Magnesium	SB
Manganese	10,000
Mercury	2.8
Nickel	310
Potassium	SB
Selenium	1500
Silver	1500
Sodium	SB
Thallium	SB
Vanadium	SB
Zinc	10,000

Note: Standards based on Determination of Soil Cleanup (NYSDEC, effective December 14, 2006)
**Background levels for lead vary widely*
SB = Site Background

4.8 Site Usage 2009 - 2012

2009 - 2010: No excavation took place on-site in 2009. Construction for the 10th Street Extension including water, sewer and natural gas utilities, was implemented and completed during 2010. Excavation and removal of soil was conducted in accordance with the Soil management Plan.

Site redevelopment included the property ownership transfer from the City of North Tonawanda to IDEK, LLC on October 22, 2010. Ownership transfer was completed to IDEK, LLC for two lots that are accessible from the new 10th Street Extension roadway. IDEK, LLC (a subsidiary and doing business as Aquasol Corporation). Aquasol Corporation is a manufacturer in welding and water soluble technology to include: water soluble paper, bags, tubes, confetti and water soluble packaging. NYSDEC Transfer of Ownership Certification is presented in Appendix F.

2011: No building activity took place in 2011. However, three trailers were found parked illegally and abandoned on site. Trailers contained old equipment, a car, and other common trash. Three 55-gallon drums were encountered that were filled with a white powder. This powder was evident throughout the one trailer that appears to be spilled materials from the drums. Approximately nine to ten 5-gallon drums were found sealed with full or half full contents of suspicious materials. No sampling of materials to date has yet been completed.

Site development is anticipated since construction is complete preparing lots with utility service connections. Additional site disturbances will occur once new development moves into the site. Future excavation will follow Soil Management Plan guidelines.

2012: Site redevelopment included the property ownership transfer from the City of North Tonawanda to Taylor Devices, Inc. on February 14, 2012. Ownership transfer was completed to Taylor Devices, Inc. for three lots that are accessible from the new 10th Street Extension roadway. Incorporated in 1955, Taylor Devices, Inc. is the manufacturer that provides full analysis, development, manufacturing and testing capabilities of Shock Absorbers, Liquid Springs, Shock Isolation Systems, Seismic Isolators, Vibration Dampers, Powerplant Snubbers, and other types of Hydro-Mechanical Energy Management Products. NYSDEC Transfer of Ownership Certification is presented in Appendix F.

The three trailers as reported in 2011 were consolidated into one trailer in 2012 by the City of North Tonawanda. Two trailers that were emptied were removed from the Site. The City is in the process of

contracting the sampling and waste disposal of these drums and wastes that have been moved into the now only trailer on Site.

The existing building adjacent to the Site and located off-site near the southwest corner of the Site has been improved. Some site activities associated with this building renovation include a small concrete pad for electrical equipment and a driveway.

2013: No building activity took place in 2013. Site development activities included the installation of underground electrical duct bank to provide commercial power for future properties by National Grid along the 10th Street Extension Right of Way.

SECTION 5 - CONCLUSIONS

Analytical testing from the 2013 sampling event detected cis-1,2-dichloroelhene at concentralions that exceeded the groundwater slandards. Concentrations of methyl-t-butyl elher (MTBE), tetrachloroethene, and trichloroethene were detected and estimated at concentrations below detection limits and the groundwater standards. Trend analysis of volatile compounds from the comparison of site historical data dated 1999, 2010, 2011, 2012, and 2013 analytical test resulls showed decreasing concenlrations of cis-1,2-dichloroethene. Concentrations of methyl-t-butyl ether (MTBE) decreased from 2010 to 2013.

Concentrations of trichloroethene decreased from 1999 to 2012. Concentrations of tetrachloroelhene and trichloroelhene are reported as estimated values.

Total VOCs detected in groundwater decreased from 1999 to 2013 from 158 ug/l to 13 ug/l.

APPENDICES

APPENDIX A

GROUNDWATER MONITORING PROGRAM REVISION

City of North Tonawanda
Department of Engineering
City Hall, 216 Payne Avenue
North Tonawanda, NY 14120-5493
www.northtonawanda.org

Dale W. Marshall, P. E.
City Engineer
Phone: (716) 695-8565
Fax: (716) 695-8568

January 7, 2010

Mr. Jeffrey Konsella, P.E.
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203

Re: Roblin Steel Groundwater Monitoring

Dear Mr. Konsella:

The City of North Tonawanda proposes modifications to the groundwater monitoring at the Roblin Steel Site. As stated in the approved Site Management Plan dated March 2007, annual monitoring will be performed on groundwater samples for a minimum period of 30 years or at a reduced frequency and period as approved by NYSDEC. Groundwater monitoring will initially be conducted after the remediation has been completed and thereafter on an annual basis. As stated in the Site Management Plan, groundwater samples will be collected from monitoring wells: GW-3S, GW-3, GW-11S, GW-12S, and GW-18S and tested for Volatile Organic Compounds (VOCs) under EPA Method 8260 TCL.

As reported in the Site Investigation Report, impacts to groundwater were localized detecting concentrations of volatile compounds in groundwater from only monitoring well MW-3S. Detected volatile concentrations were above groundwater standards as presented on the attached Table 3 of the Site Investigation Report. Groundwater from all other wells sampled was reported at non-detectable results or as estimated concentrations below groundwater standards.

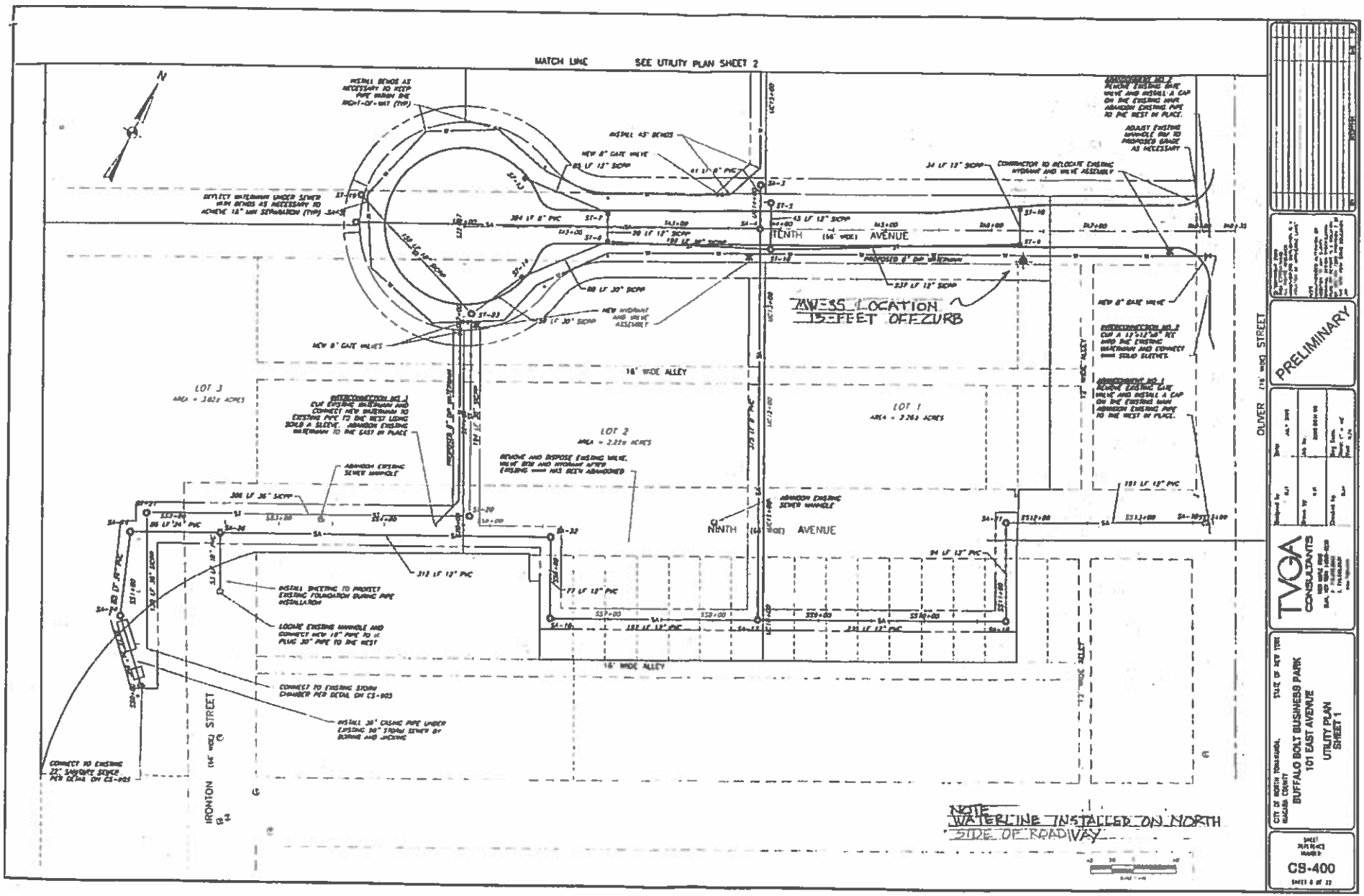
Since the Site Management Plan has been finalized, some changes have occurred to the site. All monitoring wells as listed in the Site Management Plan except for MW-11S have been reported from a recent site inspection as either damaged or missing. The City has begun site development which includes a roadway extension of Tenth Avenue as presented on Figure 1. The proposed roadway and 8-inch diameter waterline conflicts with monitoring well MW-3S location.

The City proposes to replace monitoring well MW-3S and move its location approximately 65-feet to the north of its old location. The new location would be located within the proposed road right-of-way area outside from proposed pavement and curb area. The proposed location of monitoring well MW-3S is presented on Figure 1. The City proposes to only sample groundwater from monitoring well MW-3S. Analytical testing will include Volatile Organic Compounds (VOCs) under EPA Method 8260 TCL.

Very truly yours,

Dale Marshall, P.E.
City Engineer

Cc: file, w/a
David Rowlinson, Stearns & Wheler, LLC - GHD


MATCH LINE
SEE UTILITY PLAN SHEET 2
N
TENTH (16' WIDE) AVENUE
NINTH (16' WIDE) AVENUE
IRONTON (16' WIDE) STREET
OLIVER (16' WIDE) STREET
16' WIDE ALLEY
LOT 1
LOT 2
LOT 3
MWSS LOCATION
15-FEET OFF CURB
NOTE
WATERLINE INSTALLED ON NORTH
SIDE OF ROADWAY
PRELIMINARY
TVGA CONSULTANTS
CITY OF NORTH TONAWANDA, NIAGARA COUNTY
STATE OF NEW YORK
BUFFALO BOLT BUSINESS PARK
101 EAST AVENUE
UTILITY PLAN
SHEET 1
CS-400

APPENDIX B

INSTITUTIONAL & ENGINEERING CONTROLS CERTIFICATION FORM

New York State Department of Environmental Conservation
Division of Environmental Remediation, 11th Floor
625 Broadway, Albany, New York 12233
Phone: (518) 402-9553 **Fax:** (518) 402-9577
Website: www.dec.ny.gov

Joe Martens
Commissioner

1/23/2014

Mr. Dale W. Marshall. P.E.
City Engineer
Municipal
City Hall, 216 Payne Avenue
North Tonawanda, NY 14120

Re: Reminder Notice: Site Management Periodic Review Report and IC/EC Certification Submittal
Site Name: Former Roblin Steel Site
Site No.: B00025
Site Address: 101 East Avenue
North Tonawanda, NY 14120

Dear Mr. Dale W. Marshall:

This letter serves as a reminder that sites in active Site Management (SM) require the submittal of a periodic progress report. This report, referred to as the Periodic Review Report (PRR), must document the implementation of, and compliance with, site specific SM requirements. Section 6.3(b) of DER-10 *Technical Guidance for Site Investigation and Remediation* (available online at http://www.dec.ny.gov/regulations/67386.html) provides guidance regarding the information that must be included in the PRR. Further, if the site is comprised of multiple parcels, then you as the Certifying Party must arrange to submit one PRR for all parcels that comprise the site. The PRR must be received by the Department no later than **March 16, 2014**. Guidance on the content of a PRR is enclosed.

Site Management is defined in regulation (6 NYCRR 375-1.2(at)) and in Chapter 6 of DER-10. Depending on when the remedial program for your site was completed, SM may be governed by multiple documents (e.g., Operation, Maintenance, and Monitoring Plan; Soil Management Plan) or one comprehensive Site Management Plan.

A Site Management Plan (SMP) may contain one or all of the following elements, as applicable to the site: a plan to maintain institutional controls and/or engineering controls ("IC/EC Plan"); a plan for monitoring the performance and effectiveness of the selected remedy ("Monitoring Plan"); and/or a plan for the operation and maintenance of the selected remedy ("O&M Plan"). Additionally, the technical requirements for SM are stated in the decision document (e.g., Record of Decision) and, in some cases, the legal agreement directing the remediation of the site (e.g., order on consent, voluntary agreement, etc.).

When you submit the PRR (by the due date above), include the enclosed forms documenting that all SM requirements are being met. The Institutional Controls (ICs) portion of the form (Box 6) must be signed by you or your designated representative. The Engineering Controls (ECs) portion of the form (Box 7) must be signed by a Professional Engineer (PE). If you cannot certify that all SM requirements are being met, you must submit a Corrective Measures Work Plan that identifies the actions to be taken to restore compliance. The work plan must include a schedule to be approved by the Department. The Periodic Review process will not be considered complete until all necessary corrective measures are completed and all required controls are certified. Instructions for completing the certifications are enclosed.

All site-related documents and data, including the PRR, are to be submitted in electronic format to the Department of Environmental Conservation. The Department will not approve the PRR unless all documents and data generated in support of that report have been submitted in accordance with the electronic submissions protocol. In addition, the certification forms are required to be submitted in both paper and electronic formats.

Information on the format of the data submissions can be found at:
http://www.dec.ny.gov/regulations/2586.html

The signed certification forms should be sent to Brian Sadowski, Project Manager, at the following address:

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

Phone number: 716-851-7220. E-mail: bpsadows@gw.dec.state.ny.us

The contact information above is also provided so that you may notify the project manager about upcoming inspections, or for any other questions or concerns that may arise in regard to the site.

Enclosures

PRR General Guidance
Certification Form Instructions
Certification Forms

cc: w/ enclosures

City of North Tonawanda
IDEK, LLC
Taylor Devices, Inc.

ec: w/ enclosures

Brian Sadowski, Project Manager
Greg Sutton, Hazardous Waste Remediation Engineer, Region 9
Dave Rolinson, GHD

Enclosure 1

Certification Instructions

I. Verification of Site Details (Box t and Box 2):

Answer the three questions in the Verification of Site Details Section. The Owner and/or Qualified Environmental Professional (QEP) may include handwritten changes and/or other supporting documentation, as necessary.

II. Certification of Institutional Controls/ Engineering Controls (IC/ECs)(Boxes 3, 4, and 5)

t.t.t. Review the listed IC/ECs, confirming that all existing controls are listed, and that all existing controls are still applicable. If there is a control that is no longer applicable the Owner / Remedial Party should petition the Department separately to request approval to remove the control.

2. In Box 5, complete certifications for all Plan components, as applicable, by checking the corresponding checkbox.

3. If you cannot certify "YES" for each Control listed in Box 3 & Box 4, sign and date the form in Box 5. Attach supporting documentation that explains why the **Certification** cannot be rendered, as well as a plan of proposed corrective measures, and an associated schedule for completing the corrective measures. Note that this **Certification** form must be submitted even if an IC or EC cannot be certified; however, the certification process will not be considered complete until corrective action is completed.

If the Department concurs with the explanation, the proposed corrective measures, and the proposed schedule, a letter authorizing the implementation of those corrective measures will be issued by the Department's Project Manager. Once the corrective measures are complete, a new Periodic Review Report (with IC/EC Certification) must be submitted within 45 days to the Department. If the Department has any questions or concerns regarding the PRR and/or completion of the IC/EC Certification, the Project Manager will contact you.

III. IC/EC Certification by Signature (Box 6 and Box 7):

If you certified "YES" for each Control, please complete and sign the IC/EC Certifications page as follows:

- For the Institutional Controls on the use of the property, the certification statement in Box 6 shall be completed and may be made by the property owner or designated representative.

- For the Engineering Controls, the certification statement in Box 7 must be completed by a Professional Engineer or Qualified Environmental Professional, as noted on the form.

Enclosure 2

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form

Site Details **Box 1**

Site No. **B00025**

Site Name **Former Roblin Steel Site**

Site Address: 101 East Avenue Zip Code: 14120
City/Town: North Tonawanda
County: Niagara
Site Acreage: 23.7

Reporting Period: February 14, 2013 to February 14, 2014

	YES	NO
1. Is the information above correct?	☒	☐
If NO, include handwritten above or on a separate sheet.		
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?	☐	☒
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	☐	☒
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	☐	☒
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.		
5. Is the site currently undergoing development?	☐	☒

Box 2

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

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

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

Signature of Owner, Remedial Party or Designated Representative Date

SITE NO. B00025 Box 3

Description of Institutional Controls

Parcel	Owner	Institutional Control
181.12-1-14.11	City of North Tonawanda	Ground Water Use Restriction Soil Management Plan Landuse Restriction Monitoring Plan Site Management Plan

The summary of the Environmental Easement is as follows:

The property may be used for commercial/industrial purposes (excluding uses for day care, child care, and medical care, unless such use is approved in writing by the DEC and NYSDOH) as long as the following long-term engineering controls are employed:

(i) Soils and fill materials encountered during any construction or development activity below the crushed concrete cover layer must be handled in accordance with provisions of the Roblin Steel Site Soils Management Plan, dated February, 2006. Excavated soil must be managed, characterized, and properly disposed of in accordance with NYSDEC regulations and directives.

(ii) Should subsequent construction or development activities require the decommissioning (removal) of existing groundwater monitoring wells, the wells will be decommissioned in accordance with DEC guidance. Replacement monitoring wells may be required by the DEC.

(iii) A long term ground water monitoring program is required per the approved Roblin Steel Operation, Maintenance, and Monitoring Plan, which is contained in the approved Roblin Steel Site Management Plan, dated February, 2006. The City of North Tonawanda is required to conduct the periodic sampling, analysis, and reporting for the groundwater monitoring program.

(iv) Future uses of the site groundwater are prohibited unless authorized in writing by the DEC and NYSDOH.

The property may not be used for a higher level of use such as residential use and the above-stated engineering controls may not be discontinued without an amendment or extinguishment of the Environmental Easement.

The City or any furture owners will submit annual (or such intervals as NYSDEC may allow)certification that the controls employed at the property are unchanged from the previous certification, or that any changes to the controls employed at the Controlled Property were approved by the NYSDEC, and that nothing has occurred that would impair the ability of such controls to protect the public health and environment.

181.12-1-14.112	IDEK, LLC	Monitoring Plan Site Management Plan Ground Water Use Restriction Soil Management Plan Landuse Restriction

The summary of the Environmental Easement is as follows:

The property may be used for commercial/industrial purposes (excluding uses for day care, child care, and medical care, unless such use is approved in writing by the DEC and NYSDOH) as long as the following long-term engineering controls are employed:

(i) Soils and fill materials encountered during any construction or development activity below the crushed concrete cover layer must be handled in accordance with provisions of the Roblin Steel Site Soils Management Plan, dated February, 2006. Excavated soil must be managed, characterized, and properly disposed of in accordance with NYSDEC regulations and directives.

(ii) Should subsequent construction or development activities require the decommissioning (removal) of existing groundwater monitoring wells, the wells will be decommissioned in accordance with DEC guidance. Replacement monitoring wells may be required by the DEC.

(iii) A long term ground water monitoring program is required per the approved Roblin Steel Operation, Maintenance, and Monitoring Plan, which is contained in the approved Roblin Steel Site Management Plan, dated February, 2006. The City of North Tonawanda is required to conduct the periodic sampling, analysis, and reporting for the groundwater monitoring program.

(iv) Future uses of the site groundwater are prohibited unless authorized in writing by the DEC and NYSDOH.

The property may not be used for a higher level of use such as residential use and the above-stated engineering controls may not be discontinued without an amendment or extinguishment of the Environmental Easement.

The City or any future owners will submit annual (or such intervals as NYSDEC may allow)certification that the controls employed at the property are unchanged from the previous certification, or that any changes to the controls employed at the Controlled Property were approved by the NYSDEC, and that nothing has occurred that would impair the ability of such controls to protect the public health and environment.

181.12-1-14.113 IDEK, LLC

Ground Water Use Restriction
Soil Management Plan
Landuse Restriction

Monitoring Plan
Site Management Plan

The summary of the Environmental Easement is as follows:

The property may be used for commercial/industrial purposes (excluding uses for day care, child care, and medical care, unless such use is approved in writing by the DEC and NYSDOH) as long as the following long-term engineering controls are employed:

(I) Soils and fill materials encountered during any construction or development activity below the crushed concrete cover layer must be handled in accordance with provisions of the Roblin Steel Site Soils Management Plan, dated February, 2006. Excavated soil must be managed, characterized, and properly disposed of in accordance with NYSDEC regulations and directives.

(ii) Should subsequent construction or development activities require the decommissioning (removal) of existing groundwater monitoring wells, the wells will be decommissioned in accordance with DEC guidance. Replacement monitoring wells may be required by the DEC.

(iii) A long term ground water monitoring program is required per the approved Roblin Steel Operation, Maintenance, and Monitoring Plan, which is contained in the approved Roblin Steel Site Management Plan, dated February, 2006. The City of North Tonawanda is required to conduct the periodic sampling, analysis, and reporting for the groundwater monitoring program.

(iv) Future uses of the site groundwater are prohibited unless authorized in writing by the DEC and NYSDOH.

The property may not be used for a higher level of use such as residential use and the above-stated engineering controls may not be discontinued without an amendment or extinguishment of the Environmental Easement.

The City or any future owners will submit annual (or such intervals as NYSDEC may allow)certification that the controls employed at the property are unchanged from the previous certification, or that any changes to the controls employed at the Controlled Property were approved by the NYSDEC, and that nothing has occurred that would impair the ability of such controls to protect the public health and environment.

181.12-1-24 Taylor Devices, Inc.

Monitoring Plan
Site Management Plan
Ground Water Use Restriction
Soil Management Plan
Landuse Restriction

The summary of the Environmental Easement is as follows:

The property may be used for commercial/industrial purposes (excluding uses for day care, child care, and medical care, unless such use is approved in writing by the DEC and NYSDOH) as long as the following long-term engineering controls are employed:

(i) Soils and fill materials encountered during any construction or development activity below the crushed concrete cover layer must be handled in accordance with provisions of the Roblin Steel Site Soils Management Plan, dated February, 2006. Excavated soil must be managed, characterized, and properly disposed of in accordance with NYSDEC regulations and directives.

(ii) Should subsequent construction or development activities require the decommissioning (removal) of existing groundwater monitoring wells, the wells will be decommissioned in accordance with DEC guidance. Replacement monitoring wells may be required by the DEC.

(iii) A long term ground water monitoring program is required per the approved Roblin Steel Operation, Maintenance, and Monitoring Plan, which is contained in the approved Roblin Steel Site Management Plan, dated February, 2006. The City of North Tonawanda is required to conduct the periodic sampling, analysis, and reporting for the groundwater monitoring program.

(iv) Future uses of the site groundwater are prohibited unless authorized in writing by the DEC and NYSDOH.

The property may not be used for a higher level of use such as residential use and the above-stated engineering controls may not be discontinued without an amendment or extinguishment of the Environmental Easement.

The City or any future owners will submit annual (or such intervals as NYSDEC may allow)certification that the controls employed at the property are unchanged from the previous certification, or that any changes to the controls employed at the Controlled Property were approved by the NYSDEC, and that nothing has occurred that would impair the ability of such controls to protect the public health and environment.

Box 4

Description of Engineering Controls

Parcel	Engineering Control
181.12-1-14.11	Cover System

Surface Cover System

The surface cover system was installed to eliminate the potential for human contact with fill material and eliminate the potential for contaminated runoff from the property. The cover system that was used to fill the excavated impacted soil areas was 12 inches of crushed concrete that was recycled from demolished site concrete foundations. An additional 4 inches of topsoil was spread over the crushed concrete fill to provide a vegetative supporting soil cover.

181.12-1-14.112	Cover System

Surface Cover System

The surface cover system was installed to eliminate the potential for human contact with fill material and eliminate the potential for contaminated runoff from the property. The cover system that was used to fill the excavated impacted soil areas was 12 inches of crushed concrete that was recycled from demolished site concrete foundations. An additional 4 inches of topsoil was spread over the crushed concrete fill to provide a vegetative supporting soil cover.

181.12-1-14.113	Cover System

Surface Cover System

The surface cover system was installed to eliminate the potential for human contact with fill material and eliminate the potential for contaminated runoff from the property. The cover system that was used to fill the excavated impacted soil areas was 12 inches of crushed concrete that was recycled from demolished site concrete foundations. An additional 4 inches of topsoil was spread over the crushed concrete fill to provide a vegetative supporting soil cover.

181.12-1-24	Cover System

Parcel	Engineering Control
The surface cover system was installed to eliminate the potential for human contact with fill material and eliminate the potential for contaminated runoff from the property. The cover system that was used to fill the excavated impacted soil areas was 12 inches of crushed concrete that was recycled from demolished site concrete foundations. An additional 4 inches of topsoil was spread over the crushed concrete fill to provide a vegetative supporting soil cover.	

Box 5

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

   a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

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

YES	NO
☒	☐

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

   (a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

   (b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

   (c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

   (d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

   (e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES	NO
☒	☐

IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

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

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. B00025

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1,2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Dale W. Marshall (print name) at 216 Payne Ave. N. Tonawanda, NY 14120 (print business address)

am certifying as North Tonawanda City Engineer (Owner or Remedial Party)

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

Dale W Marshall P.E. — Signature of Owner, Remedial Party, or Designated Representative Rendering Certification

1/28/14 — Date

IC/EC CERTIFICATIONS

Box 7

Professional Engineer Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Paul J. McGarvey (print name) at 200 JJ Audubon Pkwy, Suite 101 (print business address) Amherst, NY 14228

am certifying as a Professional Engineer for the City of North Tonawanda (Owner or Remedial Party)

Paul J. McGarvey

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

Stamp (Required for PE)

2/28/14

Date

Enclosure 3
Periodic Review Report (PRR) General Guidance

I. Executive Summary: (1/2-page or less)
   A. Provide a brief summary of site, nature and extent of contamination, and remedial history.
   B. Effectiveness of the Remedial Program - Provide overall conclusions regarding;
      1. progress made during the reporting period toward meeting the remedial objectives for the site
      2. the ultimate ability of the remedial program to achieve the remedial objectives for the site.
   C. Compliance
      1. Identify any areas of non-compliance regarding the major elements of the Site Management Plan (SMP, i.e., the Institutional/Engineering Control (IC/EC) Plan, the Monitoring Plan, and the Operation & Maintenance (O&M) Plan).
      2. Propose steps to be taken and a schedule to correct any areas of non-compliance.
   D. Recommendations
      1. recommend whether any changes to the SMP are needed
      2. recommend any changes to the frequency for submittal of PRRs (increase, decrease)
      3. recommend whether the requirements for discontinuing site management have been met.

II. Site Overview (one page or less)
   A. Describe the site location, boundaries (figure), significant features, surrounding area, and the nature and extent of contamination prior to site remediation.
   B. Describe the chronology of the main features of the remedial program for the site, the components of the selected remedy, cleanup goals, site closure criteria, and any significant changes to the selected remedy that have been made since remedy selection.

III. Evaluate Remedy Performance, Effectiveness, and Protectiveness
   Using tables, graphs, charts and bulleted text to the extent practicable, describe the effectiveness of the remedy in achieving the remedial goals for the site. Base findings, recommendations, and conclusions on objective data. Evaluations and should be presented simply and concisely.

IV. IC/EC Plan Compliance Report (if applicable)
   A. IC/EC Requirements and Compliance
      1. Describe each control, its objective, and how performance of the control is evaluated.
      2. Summarize the status of each goal (whether it is fully in place and its effectiveness).
      3. Corrective Measures: describe steps proposed to address any deficiencies in ICECs.
      4. Conclusions and recommendations for changes.
   B. IC/EC Certification
      1. The certification must be complete (even if there are IC/EC deficiencies), and certified by the appropriate party as set forth in a Department-approved certification form(s).

V. Monitoring Plan Compliance Report (if applicable)
   A. Components of the Monitoring Plan (tabular presentations preferred) - Describe the requirements of the monitoring plan by media (i.e., soil, groundwater, sediment, etc.) and by any remedial technologies being used at the site.
   B. Summary of Monitoring Completed During Reporting Period - Describe the monitoring tasks actually completed during this PRR reporting period. Tables and/or figures should be used to show all data.
   C. Comparisons with Remedial Objectives - Compare the results of all monitoring with the remedial objectives for the site. Include trend analyses where possible.
   D. Monitoring Deficiencies - Describe any ways in which monitoring did not fully comply with the monitoring plan.
   E. Conclusions and Recommendations for Changes - Provide overall conclusions regarding the monitoring completed and the resulting evaluations regarding remedial effectiveness.

VI. Operation & Maintenance (O&M) Plan Compliance Report (if applicable)
   A. Components of O&M Plan - Describe the requirements of the O&M plan including required activities, frequencies, recordkeeping, etc.
   B. Summary of O&M Completed During Reporting Period - Describe the O&M tasks actually completed during this PRR reporting period.
   C. Evaluation of Remedial Systems - Based upon the results of the O&M activities completed, evaluated the ability of each component of the remedy subject to O&M requirements to perform as

designed/expected.

D. O&M Deficiencies - Identify any deficiencies in complying with the O&M plan during this PRR reporting period.
E. Conclusions and Recommendations for Improvements - Provide an overall conclusion regarding O&M for the site and identify any suggested improvements requiring changes in the O&M Plan.

VII. Overall PRR Conclusions and Recommendations

A. Compliance with SMP - For each component of the SMP (i.e., IC/EC, monitoring, O&M), summarize;
   1. whether all requirements of each plan were met during the reporting period
   2. any requirements not met
   3. proposed plans and a schedule for coming into full compliance.
B. Performance and Effectiveness of the Remedy - Based upon your evaluation of the components of the SMP, form conclusions about the performance of each component and the ability of the remedy to achieve the remedial objectives for the site.
C. Future PRR Submittals
   1. Recommend, with supporting justification, whether the frequency of the submittal of PRRs should be changed (either increased or decreased).
   2. If the requirements for site closure have been achieved, contact the Departments Project Manager for the site to determine what, if any, additional documentation is needed to support a decision to discontinue site management.

VIII. Additional Guidance

Additional guidance regarding the preparation and submittal of an acceptable PRR can be obtained from the Departments Project Manager for the site.

APPENDIX C

SAMPLING AND WELL LOGS

ROBLIN STEEL SITE
CITY OF NORTH TONAWANDA, NEW YORK
SITE INSPECTION LOG SHEET

Inspector (Print): Brain Doyle

Inspector (Signature): _____

Date of Inspection: 7/24/2013

1. Fencing, Gates, and Access

Fence Intact	Yes, fencing around east and west sides of the perimeter
Gates Working	NA
Locks Operable	NA
Access Road Condition	Good

2. Waterways and Ditches

Signs of Erosion	None
Blockage of Drainage Pathway	None
Culverts Clear of Obstructions	Yes
Ponded Water Areas	None

3. Monitoring Wells - Well Casing, Cap, and Locks in Place and in Good Condition

monitoring well MW-3S in good condition.

4. Evidence of Vandalism/Site Usage by Others

None

Comments/Action Required:

GHD INC.
GROUNDWATER FIELD SAMPLING RECORD

SITE: Roblin Steel Site — DATE: 07/24/13

Sampler: Brian Doyle — SAMPLE ID: GW-3S

Depth of well (from top of casing).....	15 ft	EL 562.04
Initial static water level (from top of casing)....	5.2 ft	EL 571.9
Top of PVC Casing Elevation	577.04	

Evacuation Method:

Peristaltic		Centrifugal		1 in. casing:		ft. of water x .09 =	gallons
Airlift		Pos. Displ.		2 in. casing:	9.3	ft. of water x .16 =	1.48 gallons
Bailer	X	>>> No. of bails		3 in. casing:		ft. of water x .36 =	gallons

Well Volume Calculation

Volume of water removed: 4.44 gals.

> 3 volumes: YES / no

dry: yes / NO

Field Tests:

Temp:	16.64	C
pH	7.15	
Conductivity	0.905	mS/cm
DO	5.7	mg/L
Turbidity	890	NTUs
Oxidation Reduction Potential (ORP)	81.0	mV

Sampling: Time: 3:00 PM

Sampling Method:

Peristaltic Pump	
Disposable Bailer	X
Disposable Tubing	

Observations:

Weather/Temperature: Partly Cloudy, 70° F

Physical Appearance and Odor of Sample: Initially clear, then brownish and turbid. No odor.

Comments: 9/16" socket needed to open cover.
Well is at grade.

Stearns & Wheler, LLC

Environmental Engineers and Scientists

Boring/Well: MW-3S

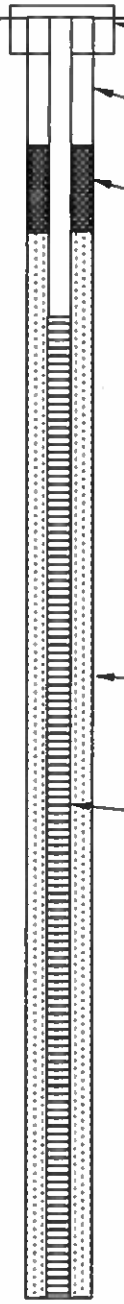
Page 1 of 1

Project No. 8612403

Date: 06/25/10

Weather: Partly Clear 70°

Project Name: Roblin Steel Groundwater Monitoring
Drilling Co.: SJB Services
S&W Representative: BPD
Drill Rig Type: Hollow Stem Auger
Drilling Method: Spilt Spoon

Depth (ft)	Sample No.	Recovery (%)	# of Blows	USCS Classification	Sample Description	Well Schematic	Comments
	S-1	88	3	GM	Black Silt (Fill)		Curb Box
1			5		- contains gravel with large cobbles		
			7				Cement Grout
2			7		2.0'		
	S-2	75	4	ML	Reddish Tan Sandy Silt		Bentonite Seal
3			8		- dry		
			10		- grades to rust/gray silt		
4			8				
	S-3	88	4		5.0'		
5			6				
			6	ML	Grayish Tan Sandy Silt		
6			8		- wet		
	S-4	63	6				
7			6				
			8				
8			10				Sandpack filter
	S-5	50	5				
9			7				
			8				0.20" Slot Well Screen
10			8		10.0'		
	S-6	88	7	CH	Reddish Gray Clay		
11			8		- dry		
			5		- some sand		
12			9				
	S-7	88	6				
13			6				
			8				
14			8				
	S-8	100	2		14.5'		
15			2	OH	Reddish Gray Clay		
			2		- wet 15.5'		
16			2		Augered to 16.0'		

APPENDIX D

ANALYTICAL TEST RESULTS

ESC
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Est. 1970

Mr. Dave Rowlinson
GHD
200 John James Audubon Pkwy; Ste 101
Amherst, NY 14228

Report Summary

Tuesday July 30, 2013

Report Number: L648419
Samples Received: 07/25/13
Client Project: 8612403

Description: Roblin Steel

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Entire Report Reviewed By: Leslie Newton

Leslie Newton , ESC Representative

Laboratory Certification Numbers

A2LA - 1461-01, AIHA - 100789, AL - 40660, CA - 01157CA, CT - PH-0197, FL - E87487, GA - 923, IN - C-TN-01, KY - 90010, KYUST - 0016, NC - ENV375/DW21704/BIO041, ND - R-140. NJ - TN002, NJ NELAP - TN002, SC - 84004, TN - 2006, VA - 460132, WV - 233, AZ - 0612, MN - 047-999-395, NY - 11742, WI - 998093910, NV - TN000032011-1, TX - T104704245-11-3, OK - 9915, PA - 68-02979, IA Lab #364

Accreditation is only applicable to the test methods specified on each scope of accreditation held by ESC Lab Sciences.
Note: The use of the preparatory EPA Method 3511 is not approved or endorsed by the CA ELAP.

Where applicable, sampling conducted by ESC is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.

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REPORT OF ANALYSIS

Mr. Dave Rowlinson
GHD
200 John James Audubon Pkwy; Ste 10
Amherst, NY 14228

July 30, 2013

Date Received : July 25, 2013
Description : Roblin Steel

Sample ID : GW-35

Collected By : Brian Doyle
Collection Date : 07/24/13 15:00

ESC Sample # : L648419-01

Site ID :

Project # : 8612403

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Volatile Organics								
Acetone	U	0.010	0.050	mg/l		8260B	07/27/13	1
Benzene	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
Bromochloromethane	U	0.00052	0.0010	mg/l		8260B	07/27/13	1
Bromodichloromethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Bromoform	U	0.00047	0.0010	mg/l		8260B	07/27/13	1
Bromomethane	U	0.00087	0.0050	mg/l		8260B	07/27/13	1
Carbon disulfide	U	0.00028	0.0010	mg/l		8260B	07/27/13	1
Carbon tetrachloride	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Chlorobenzene	U	0.00035	0.0010	mg/l		8260B	07/27/13	1
Chlorodibromomethane	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
Chloroethane	U	0.00045	0.0050	mg/l		8260B	07/27/13	1
Chloroform	U	0.00032	0.0050	mg/l		8260B	07/27/13	1
Chloromethane	U	0.00028	0.0025	mg/l		8260B	07/27/13	1
Cyclohexane	U	0.00039	0.0010	mg/l		8260B	07/27/13	1
1,2-Dibromo-3-Chloropropane	U	0.0013	0.0050	mg/l		8260B	07/27/13	1
1,2-Dibromoethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichlorobenzene	U	0.00035	0.0010	mg/l		8260B	07/27/13	1
1,3-Dichlorobenzene	U	0.00022	0.0010	mg/l		8260B	07/27/13	1
1,4-Dichlorobenzene	U	0.00027	0.0010	mg/l		8260B	07/27/13	1
Dichlorodifluoromethane	U	0.00055	0.0050	mg/l		8260B	07/27/13	1
1,1-Dichloroethane	U	0.00026	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichloroethane	U	0.00036	0.0010	mg/l		8260B	07/27/13	1
1,1-Dichloroethene	U	0.00040	0.0010	mg/l		8260B	07/27/13	1
cis-1,2-Dichloroethene	0.011	0.00026	0.0010	mg/l		8260B	07/27/13	1
trans-1,2-Dichloroethene	U	0.00040	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichloropropane	U	0.00031	0.0010	mg/l		8260B	07/27/13	1
cis-1,3-Dichloropropene	U	0.00042	0.0010	mg/l		8260B	07/27/13	1
trans-1,3-Dichloropropene	U	0.00042	0.0010	mg/l		8260B	07/27/13	1
Ethylbenzene	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
2-Hexanone	U	0.0038	0.010	mg/l		8260B	07/27/13	1
Isopropylbenzene	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
2-Butanone (MEK)	U	0.0039	0.010	mg/l	J3	8260B	07/27/13	1
Methyl Acetate	U	0.0043	0.020	mg/l		8260B	07/27/13	1
Methyl Cyclohexane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Methylene Chloride	U	0.0010	0.0050	mg/l		8260B	07/27/13	1
4-Methyl-2-pentanone (MIBK)	U	0.0021	0.010	mg/l		8260B	07/27/13	1
Methyl tert-butyl ether	0.00042	0.00037	0.0010	mg/l	J	8260B	07/27/13	1
Styrene	U	0.00031	0.0010	mg/l		8260B	07/27/13	1
1,1,2,2-Tetrachloroethane	U	0.00058	0.0010	mg/l		8260B	07/27/13	1
Tetrachloroethene	0.00091	0.00037	0.0010	mg/l	J	8260B	07/27/13	1
Toluene	U	0.00078	0.0050	mg/l		8260B	07/27/13	1
1,2,3-Trichlorobenzene	U	0.00023	0.0010	mg/l		8260B	07/27/13	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD = TRRP SDL
RDL = Reported Detection Limit = LOQ = PQL = EQL = TRRP MQL
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

Mr. Dave Rowlinson
GHD
200 John James Audubon Pkwy; Ste 10
Amherst, NY 14228

July 30, 2013

ESC Sample # : L648419-01

Site ID :

Project # : 8612403

Date Received : July 25, 2013
Description : Roblin Steel

Sample ID : GW-35

Collected By : Brian Doyle
Collection Date : 07/24/13 15:00

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
1,2,4-Trichlorobenzene	U	0.00021	0.0010	mg/l		8260B	07/27/13	1
1,1,1-Trichloroethane	U	0.00032	0.0010	mg/l		8260B	07/27/13	1
1,1,2-Trichloroethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Trichloroethene	0.00075	0.00040	0.0010	mg/l	J	8260B	07/27/13	1
Trichlorofluoromethane	U	0.0012	0.0050	mg/l		8260B	07/27/13	1
1,1,2-Trichlorotrifluoroethane	U	0.00030	0.0010	mg/l		8260B	07/27/13	1
Vinyl chloride	U	0.00026	0.0010	mg/l		8260B	07/27/13	1
Xylenes, Total	U	0.0011	0.0030	mg/l		8260B	07/27/13	1
Surrogate Recovery								
Toluene-d8	105.			% Rec.		8260B	07/27/13	1
Dibromofluoromethane	107.			% Rec.		8260B	07/27/13	1
a,a,a-Trifluorotoluene	107.			% Rec.		8260B	07/27/13	1
4-Bromofluorobenzene	102.			% Rec.		8260B	07/27/13	1

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Note:
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REPORT OF ANALYSIS

Mr. Dave Rowlinson
GHD
200 John James Audubon Pkwy; Ste 10
Amherst, NY 14228

July 30, 2013

ESC Sample # : L648419-02

Site ID :

Project # : 8612403

Date Received : July 25, 2013
Description : Roblin Steel

Sample ID : FIELD DUP

Collected By : Brian Doyle
Collection Date : 07/24/13 15:00

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Volatile Organics								
Acetone	U	0.010	0.050	mg/l		8260B	07/27/13	1
Benzene	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
Bromochloromethane	U	0.00052	0.0010	mg/l		8260B	07/27/13	1
Bromodichloromethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Bromoform	U	0.00047	0.0010	mg/l		8260B	07/27/13	1
Bromomethane	U	0.00087	0.0050	mg/l		8260B	07/27/13	1
Carbon disulfide	U	0.00028	0.0010	mg/l		8260B	07/27/13	1
Carbon tetrachloride	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Chlorobenzene	U	0.00035	0.0010	mg/l		8260B	07/27/13	1
Chlorodibromomethane	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
Chloroethane	U	0.00045	0.0050	mg/l		8260B	07/27/13	1
Chloroform	U	0.00032	0.0050	mg/l		8260B	07/27/13	1
Chloromethane	U	0.00028	0.0025	mg/l		8260B	07/27/13	1
Cyclohexane	U	0.00039	0.0010	mg/l		8260B	07/27/13	1
1,2-Dibromo-3-Chloropropane	U	0.0013	0.0050	mg/l		8260B	07/27/13	1
1,2-Dibromoethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichlorobenzene	U	0.00035	0.0010	mg/l		8260B	07/27/13	1
1,3-Dichlorobenzene	U	0.00022	0.0010	mg/l		8260B	07/27/13	1
1,4-Dichlorobenzene	U	0.00027	0.0010	mg/l		8260B	07/27/13	1
Dichlorodifluoromethane	U	0.00055	0.0050	mg/l		8260B	07/27/13	1
1,1-Dichloroethane	U	0.00026	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichloroethane	U	0.00036	0.0010	mg/l		8260B	07/27/13	1
1,1-Dichloroethene	U	0.00040	0.0010	mg/l		8260B	07/27/13	1
cis-1,2-Dichloroethene	0.0099	0.00026	0.0010	mg/l		8260B	07/27/13	1
trans-1,2-Dichloroethene	U	0.00040	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichloropropane	U	0.00031	0.0010	mg/l		8260B	07/27/13	1
cis-1,3-Dichloropropene	U	0.00042	0.0010	mg/l		8260B	07/27/13	1
trans-1,3-Dichloropropene	U	0.00042	0.0010	mg/l		8260B	07/27/13	1
Ethylbenzene	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
2-Hexanone	U	0.0038	0.010	mg/l		8260B	07/27/13	1
Isopropylbenzene	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
2-Butanone (MEK)	U	0.0039	0.010	mg/l	J3	8260B	07/27/13	1
Methyl Acetate	U	0.0043	0.020	mg/l		8260B	07/27/13	1
Methyl Cyclohexane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Methylene Chloride	U	0.0010	0.0050	mg/l		8260B	07/27/13	1
4-Methyl-2-pentanone (MIBK)	U	0.0021	0.010	mg/l		8260B	07/27/13	1
Methyl tert-butyl ether	0.00038	0.00037	0.0010	mg/l	J	8260B	07/27/13	1
Styrene	U	0.00031	0.0010	mg/l		8260B	07/27/13	1
1,1,2,2-Tetrachloroethane	U	0.00058	0.0010	mg/l		8260B	07/27/13	1
Tetrachloroethene	0.0010	0.00037	0.0010	mg/l		8260B	07/27/13	1
Toluene	U	0.00078	0.0050	mg/l		8260B	07/27/13	1
1,2,3-Trichlorobenzene	U	0.00023	0.0010	mg/l		8260B	07/27/13	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD = TRRP SDL
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Note:
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REPORT OF ANALYSIS

Mr. Dave Rowlinson
GHD
200 John James Audubon Pkwy; Ste 10
Amherst, NY 14228

July 30, 2013

ESC Sample # : L648419-02

Site ID :

Project # : 8612403

Date Received : July 25, 2013
Description : Roblin Steel

Sample ID : FIELD DUP

Collected By : Brian Doyle
Collection Date : 07/24/13 15:00

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
1,2,4-Trichlorobenzene	U	0.00021	0.0010	mg/l		8260B	07/27/13	1
1,1,1-Trichloroethane	U	0.00032	0.0010	mg/l		8260B	07/27/13	1
1,1,2-Trichloroethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Trichloroethene	0.00056	0.00040	0.0010	mg/l	J	8260B	07/27/13	1
Trichlorofluoromethane	U	0.0012	0.0050	mg/l		8260B	07/27/13	1
1,1,2-Trichlorotrifluoroethane	U	0.00030	0.0010	mg/l		8260B	07/27/13	1
Vinyl chloride	U	0.00026	0.0010	mg/l		8260B	07/27/13	1
Xylenes, Total	U	0.0011	0.0030	mg/l		8260B	07/27/13	1
Surrogate Recovery								
Toluene-d8	105.			% Rec.		8260B	07/27/13	1
Dibromofluoromethane	105.			% Rec.		8260B	07/27/13	1
a,a,a-Trifluorotoluene	106.			% Rec.		8260B	07/27/13	1
4-Bromofluorobenzene	101.			% Rec.		8260B	07/27/13	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD = TRRP SDL
RDL = Reported Detection Limit = LOQ = PQL = EQL = TRRP MQL
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 07/30/13 09:32 Printed: 07/30/13 09:32

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REPORT OF ANALYSIS

Mr. Dave Rowlinson
GHD
200 John James Audubon Pkwy; Ste 10
Amherst, NY 14228

July 30, 2013

Date Received : July 25, 2013
Description : Roblin Steel

Sample ID : TRIP BLANK

Collected By : Brian Doyle
Collection Date : 07/24/13 00:00

ESC Sample # : L648419-03

Site ID :

Project # : 8612403

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Volatile Organics								
Acetone	U	0.010	0.050	mg/l		8260B	07/27/13	1
Benzene	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
Bromochloromethane	U	0.00052	0.0010	mg/l		8260B	07/27/13	1
Bromodichloromethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Bromoform	U	0.00047	0.0010	mg/l		8260B	07/27/13	1
Bromomethane	U	0.00087	0.0050	mg/l		8260B	07/27/13	1
Carbon disulfide	U	0.00028	0.0010	mg/l		8260B	07/27/13	1
Carbon tetrachloride	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Chlorobenzene	U	0.00035	0.0010	mg/l		8260B	07/27/13	1
Chlorodibromomethane	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
Chloroethane	U	0.00045	0.0050	mg/l		8260B	07/27/13	1
Chloroform	U	0.00032	0.0050	mg/l		8260B	07/27/13	1
Chloromethane	U	0.00028	0.0025	mg/l		8260B	07/27/13	1
Cyclohexane	U	0.00039	0.0010	mg/l		8260B	07/27/13	1
1,2-Dibromo-3-Chloropropane	U	0.0013	0.0050	mg/l		8260B	07/27/13	1
1,2-Dibromoethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichlorobenzene	U	0.00035	0.0010	mg/l		8260B	07/27/13	1
1,3-Dichlorobenzene	U	0.00022	0.0010	mg/l		8260B	07/27/13	1
1,4-Dichlorobenzene	U	0.00027	0.0010	mg/l		8260B	07/27/13	1
Dichlorodifluoromethane	U	0.00055	0.0050	mg/l		8260B	07/27/13	1
1,1-Dichloroethane	U	0.00026	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichloroethane	U	0.00036	0.0010	mg/l		8260B	07/27/13	1
1,1-Dichloroethene	U	0.00040	0.0010	mg/l		8260B	07/27/13	1
cis-1,2-Dichloroethene	U	0.00026	0.0010	mg/l		8260B	07/27/13	1
trans-1,2-Dichloroethene	U	0.00040	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichloropropane	U	0.00031	0.0010	mg/l		8260B	07/27/13	1
cis-1,3-Dichloropropene	U	0.00042	0.0010	mg/l		8260B	07/27/13	1
trans-1,3-Dichloropropene	U	0.00042	0.0010	mg/l		8260B	07/27/13	1
Ethylbenzene	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
2-Hexanone	U	0.0038	0.010	mg/l		8260B	07/27/13	1
Isopropylbenzene	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
2-Butanone (MEK)	U	0.0039	0.010	mg/l	J3	8260B	07/27/13	1
Methyl Acetate	U	0.0043	0.020	mg/l		8260B	07/27/13	1
Methyl Cyclohexane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Methylene Chloride	U	0.0010	0.0050	mg/l		8260B	07/27/13	1
4-Methyl-2-pentanone (MIBK)	U	0.0021	0.010	mg/l		8260B	07/27/13	1
Methyl tert-butyl ether	U	0.00037	0.0010	mg/l		8260B	07/27/13	1
Styrene	U	0.00031	0.0010	mg/l		8260B	07/27/13	1
1,1,2,2-Tetrachloroethane	U	0.00058	0.0010	mg/l		8260B	07/27/13	1
Tetrachloroethene	U	0.00037	0.0010	mg/l		8260B	07/27/13	1
Toluene	U	0.00078	0.0050	mg/l		8260B	07/27/13	1
1,2,3-Trichlorobenzene	U	0.00023	0.0010	mg/l		8260B	07/27/13	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD = TRRP SDL
RDL = Reported Detection Limit = LOQ = PQL = EQL = TRRP MQL
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

Mr. Dave Rowlinson
GHD
200 John James Audubon Pkwy; Ste 10
Amherst, NY 14228

July 30, 2013

ESC Sample # : L648419-03

Date Received : July 25, 2013
Description : Roblin Steel

Site ID :

Sample ID : TRIP BLANK

Project # : 8612403

Collected By : Brian Doyle
Collection Date : 07/24/13 00:00

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
1,2,4-Trichlorobenzene	U	0.00021	0.0010	mg/l		8260B	07/27/13	1
1,1,1-Trichloroethane	U	0.00032	0.0010	mg/l		8260B	07/27/13	1
1,1,2-Trichloroethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Trichloroethene	U	0.00040	0.0010	mg/l		8260B	07/27/13	1
Trichlorofluoromethane	U	0.0012	0.0050	mg/l		8260B	07/27/13	1
1,1,2-Trichlorotrifluoroethane	U	0.00030	0.0010	mg/l		8260B	07/27/13	1
Vinyl chloride	U	0.00026	0.0010	mg/l		8260B	07/27/13	1
Xylenes, Total	U	0.0011	0.0030	mg/l		8260B	07/27/13	1
Surrogate Recovery								
Toluene-d8	106.			% Rec.		8260B	07/27/13	1
Dibromofluoromethane	104.			% Rec.		8260B	07/27/13	1
a,a,a-Trifluorotoluene	106.			% Rec.		8260B	07/27/13	1
4-Bromofluorobenzene	105.			% Rec.		8260B	07/27/13	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD = TRRP SDL
RDL = Reported Detection Limit = LOQ = PQL = EQL = TRRP MQL
Note:
The reported analytical results relate only to the sample submitted.

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Attachment A
List of Analytes with QC Qualifiers

Sample Number	Work Group	Sample Type	Analyte	Run ID	Qualifier
L648419-01	WG673961	SAMP	2-Butanone (MEK)	R2759060	J3
	WG673961	SAMP	Methyl tert-butyl ether	R2759060	J
	WG673961	SAMP	Tetrachloroethene	R2759060	J
	WG673961	SAMP	Trichloroethene	R2759060	J
L648419-02	WG673961	SAMP	2-Butanone (MEK)	R2759060	J3
	WG673961	SAMP	Methyl tert-butyl ether	R2759060	J
	WG673961	SAMP	Trichloroethene	R2759060	J
L648419-03	WG673961	SAMP	2-Butanone (MEK)	R2759060	J3

Attachment B
Explanation of QC Qualifier Codes

Qualifier	Meaning
J	(EPA) - Estimated value below the lowest calibration point. Confidence correlates with concentration.
J3	The associated batch QC was outside the established quality control range for precision.

Qualifier Report Information

ESC utilizes sample and result qualifiers as set forth by the EPA Contract Laboratory Program and as required by most certifying bodies including NELAC. In addition to the EPA qualifiers adopted by ESC, we have implemented ESC qualifiers to provide more information pertaining to our analytical results. Each qualifier is designated in the qualifier explanation as either EPA or ESC. Data qualifiers are intended to provide the ESC client with more detailed information concerning the potential bias of reported data. Because of the wide range of constituents and variety of matrices incorporated by most EPA methods,it is common for some compounds to fall outside of established ranges. These exceptions are evaluated and all reported data is valid and useable "unless qualified as 'R' (Rejected)."

Definitions

Accuracy - The relationship of the observed value of a known sample to the true value of a known sample. Represented by percent recovery and relevant to samples such as: control samples, matrix spike recoveries, surrogate recoveries, etc.

Precision - The agreement between a set of samples or between duplicate samples. Relates to how close together the results are and is represented by Relative Percent Differrence.

Surrogate - Organic compounds that are similar in chemical composition, extraction, and chromotography to analytes of interest. The surrogates are used to determine the probable response of the group of analytes that are chemically related to the surrogate compound. Surrogates are added to the sample and carried through all stages of preparation and analyses.

TIC - Tentatively Identified Compound: Compounds detected in samples that are not target compounds, internal standards, system monitoring compounds, or surrogates.

Summary of Remarks For Samples Printed
07/30/13 at 09:33:00

TSR Signing Reports: 044
R5 - Desired TAT

Sample: L648419-01 Account: STEARNSANY Received: 07/25/13 09:30 Due Date: 08/01/13 00:00 RPT Date: 07/30/13 09:32

Sample: L648419-02 Account: STEARNSANY Received: 07/25/13 09:30 Due Date: 08/01/13 00:00 RPT Date: 07/30/13 09:32

Sample: L648419-03 Account: STEARNSANY Received: 07/25/13 09:30 Due Date: 08/01/13 00:00 RPT Date: 07/30/13 09:32

GHD 200 John James Audubon Pkwy; Ste 101 Amherst, NY 14228	**Billing Information:** 200 John James Audubon Pkwy; Ste 101 Amherst, NY 14228	Analysis / Container / Preservative
Report to: Mr. Dave Rowlinson	Email To: dave.rowlinson@ghd.com	
Project Description: Roblin Steel	City/State Collected:	
Phone: 716-691-8503 Fax:	Client Project # 8612403	Lab Project # STEARNSANY-ROBLIN
Collected by (print): Brian Doyle	Site/Facility ID #	P.O. #
Collected by (signature): Brian P. Doyle Immediately Packed on Ice N ___ Y X	*Rush?* (Lab MUST Be Notified) ___ Same Day .....200% ___ Next Day .....100% ___ Two Day .....50% ___ Three Day 25%	Date Results Needed Email? ___No ___Yes FAX? ___No ___Yes

Sample ID	Comp/Grab	Matrix *	Depth	Date	Time	No. of Cntrs	V8260TCL 40mlAmb-HCl	V8260TCL 40mlAmb-HCl-Blk								Rem./Contaminant	Sample # (lab only)
GW-35	Grab	GW		7/24/13	15:00	2	X										L - 01
FIELD DUP		GW		7/24/13	15:00	2	X										02
TRIP BLANK		GW		7/24/13		1		X									03

Chain of Custody Page ___ of ___

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L# L648419

Tat J008

Acctnum: STEARNSANY
Template: T80570
Prelogin: P436946
TSR: 044 - Leslie Newton
PB: KW 7-17
Shipped Via: FedEX Ground

* Matrix: SS - Soil GW - Groundwater WW - WasteWater DW - Drinking Water OT - Other_____ pH _____ Temp _____

Remarks: 5704 6052 2163 Flow _____ Other _____

Hold #

Relinquished by : (Signature)	Date:	Time:	Received by: (Signature)	Samples returned via: ☐ UPS ☐ FedEx ☐ Courier ☐ _____
David Rowlinson	7/24/13	4:30pm		
Relinquished by : (Signature)	Date:	Time:	Received by: (Signature)	Temp: 3.6 °C Bottles Received: 5
Relinquished by : (Signature)	Date:	Time:	Received for lab by: (Signature)	Date: 7-25-13 Time: 0930

Condition: (lab use only) OK (SW)

COC Seal Intact: ___Y ___N ___NA

pH Checked: NCF:

APPENDIX E

DATA USABILITY REPORTING

Data Usability Summary Report

Vali-Data of WNY, LLC
1514 Davis Rd.
West Falls, NY 14170

Roblin Steel
Project # 8612403
ESC Lab Sciences SDG#L648419
January 10, 2014
Sampling date: 07/24/2013

Prepared by:
Jodi Zimmerman
Vali-Data of WNY, LLC
1514 Davis Rd.
West Falls, NY 14170

DELIVERABLES

This Data Usability Summary Report (DUSR) was prepared by evaluating the analytical data package for Stearns and Wheler, project located at Roblin Steel, project # 8612403, SDG#L648419, submitted to Vali-Data of WNY, LLC on September 11, 2012. This DUSR has been prepared in general compliance with NYSDEC Analytical Services Protocol and USEPA National Functional Guidelines. The laboratory performed the analysis using USEPA method 8260 (Volatile Organics).

VOLATILE ORGANIC COMPOUNDS

The following items/criteria were reviewed for this analytical suite:

- Data Completeness
-Narrative and Data Reporting Forms
-Chain of Custody and Traffic Reports
-Holding Times
-Internal Standard (IS) Area Performance
-Surrogate Spike Recoveries
-Method Blank
-Field Duplicate Sample Precision
-Laboratory Control Samples
-MS/MSD
-Compound Quantitation
-Initial Calibration
-Continuing Calibration
-GC/MS Performance Check

The items listed above were technically in compliance with the method and SOP criteria with the exceptions discussed in the text below. The data have been reviewed according to the procedures outlined above and qualified accordingly.

OVERALL EVALUATION OF DATA AND POTENTIAL USABILITY ISSUES
The data are acceptable for use except where qualified below in Laboratory Control Samples.

DATA COMPLETENESS
All criteria were met.

NARRATIVE AND DATA REPORTING FORMS
All criteria were met except there was no prep log included in the initial package. An updated injection log is attached, to verify pH.

CHAIN OF CUSTODY AND TRAFFIC REPORTS
All criteria were met.

HOLDING TIMES
All holding times were met.

INTERNAL STANDARD (IS)
All criteria were met.

SURROGATE SPIKE RECOVERIES
All criteria were met.

METHOD BLANK
All criteria were met except 1,2-Dichloropropane and trans-1,3-Dichloropropene were detected in the samples. ESC Lab Sciences has reviewed the data and does not believe these target analytes to be present.

FIELD DUPLICATE SAMPLE PRECISION
All criteria were met.

LABORATORY CONTROL SAMPLES
All criteria were met except the %RPD of 2-Butanone between WG673961LCS and WG673961LCSD was outside QC limits. 2-Butanone was qualified with a 'J3' in the samples.

MS/MSD
The MS/MSD were not performed on samples within this SDG.

COMPOUND QUANTITATION
All criteria were met except 1,2-Dichloropropane and trans-1,3-Dichloropropene were detected in the samples. ESC Lab Sciences has reviewed the data and does not believe these target analytes to be present.

INITIAL CALIBRATION
All criteria were met except linear regression was used on Methyl Cyclohexane with acceptable results.

CONTINUING CALIBRATION
All criteria were met except linear regression was used on Methyl Cyclohexane with acceptable results.

GC/MS PERFORMANCE CHECK
All criteria were met.

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REPORT OF ANALYSIS

Mr. Dave Rowlinson
GHD
200 John James Audubon Pkwy; Ste 10
Amherst, NY 14228

December 17, 2013

ESC Sample # : L648419-01

Site ID :

Project # : 8612403

Date Received : July 25, 2013
Description : Roblin Steel

Sample ID : GW-35

Collected By : Brian Doyle
Collection Date : 07/24/13 15:00

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Volatile Organics								
Acetone	U	0.010	0.050	mg/l		8260B	07/27/13	1
Benzene	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
Bromochloromethane	U	0.00052	0.0010	mg/l		8260B	07/27/13	1
Bromodichloromethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Bromoform	U	0.00047	0.0010	mg/l		8260B	07/27/13	1
Bromomethane	U	0.00087	0.0050	mg/l		8260B	07/27/13	1
Carbon disulfide	U	0.00028	0.0010	mg/l		8260B	07/27/13	1
Carbon tetrachloride	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Chlorobenzene	U	0.00035	0.0010	mg/l		8260B	07/27/13	1
Chlorodibromomethane	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
Chloroethane	U	0.00045	0.0050	mg/l		8260B	07/27/13	1
Chloroform	U	0.00032	0.0050	mg/l		8260B	07/27/13	1
Chloromethane	U	0.00028	0.0025	mg/l		8260B	07/27/13	1
Cyclohexane	U	0.00039	0.0010	mg/l		8260B	07/27/13	1
1,2-Dibromo-3-Chloropropane	U	0.0013	0.0050	mg/l		8260B	07/27/13	1
1,2-Dibromoethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichlorobenzene	U	0.00035	0.0010	mg/l		8260B	07/27/13	1
1,3-Dichlorobenzene	U	0.00022	0.0010	mg/l		8260B	07/27/13	1
1,4-Dichlorobenzene	U	0.00027	0.0010	mg/l		8260B	07/27/13	1
Dichlorodifluoromethane	U	0.00055	0.0050	mg/l		8260B	07/27/13	1
1,1-Dichloroethane	U	0.00026	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichloroethane	U	0.00036	0.0010	mg/l		8260B	07/27/13	1
1,1-Dichloroethene	U	0.00040	0.0010	mg/l		8260B	07/27/13	1
cis-1,2-Dichloroethene	0.011	0.00026	0.0010	mg/l		8260B	07/27/13	1
trans-1,2-Dichloroethene	U	0.00040	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichloropropane	U	0.00031	0.0010	mg/l		8260B	07/27/13	1
cis-1,3-Dichloropropene	U	0.00042	0.0010	mg/l		8260B	07/27/13	1
trans-1,3-Dichloropropene	U	0.00042	0.0010	mg/l		8260B	07/27/13	1
Ethylbenzene	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
2-Hexanone	U	0.0038	0.010	mg/l		8260B	07/27/13	1
Isopropylbenzene	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
2-Butanone (MEK)	U	0.0039	0.010	mg/l	J3	8260B	07/27/13	1
Methyl Acetate	U	0.0043	0.020	mg/l		8260B	07/27/13	1
Methyl Cyclohexane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Methylene Chloride	U	0.0010	0.0050	mg/l		8260B	07/27/13	1
4-Methyl-2-pentanone (MIBK)	U	0.0021	0.010	mg/l		8260B	07/27/13	1
Methyl tert-butyl ether	0.00042	0.00037	0.0010	mg/l	J	8260B	07/27/13	1
Styrene	U	0.00031	0.0010	mg/l		8260B	07/27/13	1
1,1,2,2-Tetrachloroethane	U	0.00058	0.0010	mg/l		8260B	07/27/13	1
Tetrachloroethene	0.00091	0.00037	0.0010	mg/l	J	8260B	07/27/13	1
Toluene	U	0.00078	0.0050	mg/l		8260B	07/27/13	1
1,2,3-Trichlorobenzene	U	0.00023	0.0010	mg/l		8260B	07/27/13	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD = TRRP SDL
RDL = Reported Detection Limit = LOQ = PQL = EQL = TRRP MQL
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

Mr. Dave Rowlinson
GHD
200 John James Audubon Pkwy; Ste 10
Amherst, NY 14228

December 17, 2013

Date Received : July 25, 2013
Description : Roblin Steel

Sample ID : GW-35

Collected By : Brian Doyle
Collection Date : 07/24/13 15:00

ESC Sample # : L648419-01

Site ID :

Project # : 8612403

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
1,2,4-Trichlorobenzene	U	0.00021	0.0010	mg/l		8260B	07/27/13	1
1,1,1-Trichloroethane	U	0.00032	0.0010	mg/l		8260B	07/27/13	1
1,1,2-Trichloroethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Trichloroethene	0.00075	0.00040	0.0010	mg/l	J	8260B	07/27/13	1
Trichlorofluoromethane	U	0.0012	0.0050	mg/l		8260B	07/27/13	1
1,1,2-Trichlorotrifluoroethane	U	0.00030	0.0010	mg/l		8260B	07/27/13	1
Vinyl chloride	U	0.00026	0.0010	mg/l		8260B	07/27/13	1
Xylenes, Total	U	0.0011	0.0030	mg/l		8260B	07/27/13	1
Surrogate Recovery								
Toluene-d8	105.			% Rec.		8260B	07/27/13	1
Dibromofluoromethane	107.			% Rec.		8260B	07/27/13	1
a,a,a-Trifluorotoluene	107.			% Rec.		8260B	07/27/13	1
4-Bromofluorobenzene	102.			% Rec.		8260B	07/27/13	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD = TRRP SDL
RDL = Reported Detection Limit = LOQ = PQL = EQL = TRRP MQL
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 07/30/13 09:32 Revised: 12/17/13 09:24

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REPORT OF ANALYSIS

Mr. Dave Rowlinson
GHD
200 John James Audubon Pkwy; Ste 10
Amherst, NY 14228

December 17, 2013

ESC Sample # : L648419-02

Site ID :

Project # : 8612403

Date Received : July 25, 2013
Description : Roblin Steel

Sample ID : FIELD DUP

Collected By : Brian Doyle
Collection Date : 07/24/13 15:00

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Volatile Organics								
Acetone	U	0.010	0.050	mg/l		8260B	07/27/13	1
Benzene	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
Bromochloromethane	U	0.00052	0.0010	mg/l		8260B	07/27/13	1
Bromodichloromethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Bromoform	U	0.00047	0.0010	mg/l		8260B	07/27/13	1
Bromomethane	U	0.00087	0.0050	mg/l		8260B	07/27/13	1
Carbon disulfide	U	0.00028	0.0010	mg/l		8260B	07/27/13	1
Carbon tetrachloride	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Chlorobenzene	U	0.00035	0.0010	mg/l		8260B	07/27/13	1
Chlorodibromomethane	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
Chloroethane	U	0.00045	0.0050	mg/l		8260B	07/27/13	1
Chloroform	U	0.00032	0.0050	mg/l		8260B	07/27/13	1
Chloromethane	U	0.00028	0.0025	mg/l		8260B	07/27/13	1
Cyclohexane	U	0.00039	0.0010	mg/l		8260B	07/27/13	1
1,2-Dibromo-3-Chloropropane	U	0.0013	0.0050	mg/l		8260B	07/27/13	1
1,2-Dibromoethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichlorobenzene	U	0.00035	0.0010	mg/l		8260B	07/27/13	1
1,3-Dichlorobenzene	U	0.00022	0.0010	mg/l		8260B	07/27/13	1
1,4-Dichlorobenzene	U	0.00027	0.0010	mg/l		8260B	07/27/13	1
Dichlorodifluoromethane	U	0.00055	0.0050	mg/l		8260B	07/27/13	1
1,1-Dichloroethane	U	0.00026	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichloroethane	U	0.00036	0.0010	mg/l		8260B	07/27/13	1
1,1-Dichloroethene	U	0.00040	0.0010	mg/l		8260B	07/27/13	1
cis-1,2-Dichloroethene	0.0099	0.00026	0.0010	mg/l		8260B	07/27/13	1
trans-1,2-Dichloroethene	U	0.00040	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichloropropane	U	0.00031	0.0010	mg/l		8260B	07/27/13	1
cis-1,3-Dichloropropene	U	0.00042	0.0010	mg/l		8260B	07/27/13	1
trans-1,3-Dichloropropene	U	0.00042	0.0010	mg/l		8260B	07/27/13	1
Ethylbenzene	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
2-Hexanone	U	0.0038	0.010	mg/l		8260B	07/27/13	1
Isopropylbenzene	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
2-Butanone (MEK)	U	0.0039	0.010	mg/l	J3	8260B	07/27/13	1
Methyl Acetate	U	0.0043	0.020	mg/l		8260B	07/27/13	1
Methyl Cyclohexane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Methylene Chloride	U	0.0010	0.0050	mg/l		8260B	07/27/13	1
4-Methyl-2-pentanone (MIBK)	U	0.0021	0.010	mg/l		8260B	07/27/13	1
Methyl tert-butyl ether	0.00038	0.00037	0.0010	mg/l	J	8260B	07/27/13	1
Styrene	U	0.00031	0.0010	mg/l		8260B	07/27/13	1
1,1,2,2-Tetrachloroethane	U	0.00058	0.0010	mg/l		8260B	07/27/13	1
Tetrachloroethene	0.0010	0.00037	0.0010	mg/l		8260B	07/27/13	1
Toluene	U	0.00078	0.0050	mg/l		8260B	07/27/13	1
1,2,3-Trichlorobenzene	U	0.00023	0.0010	mg/l		8260B	07/27/13	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD = TRRP SDL
RDL = Reported Detection Limit = LOQ = PQL = EQL = TRRP MQL
Note:
The reported analytical results relate only to the sample submitted.

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REPORT OF ANALYSIS

Mr. Dave Rowlinson
GHD
200 John James Audubon Pkwy; Ste 10
Amherst, NY 14228

December 17, 2013

ESC Sample # : L648419-02

Site ID :

Project # : 8612403

Date Received : July 25, 2013
Description : Roblin Steel

Sample ID : FIELD DUP

Collected By : Brian Doyle
Collection Date : 07/24/13 15:00

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
1,2,4-Trichlorobenzene	U	0.00021	0.0010	mg/l		8260B	07/27/13	1
1,1,1-Trichloroethane	U	0.00032	0.0010	mg/l		8260B	07/27/13	1
1,1,2-Trichloroethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Trichloroethene	0.00056	0.00040	0.0010	mg/l	J	8260B	07/27/13	1
Trichlorofluoromethane	U	0.0012	0.0050	mg/l		8260B	07/27/13	1
1,1,2-Trichlorotrifluoroethane	U	0.00030	0.0010	mg/l		8260B	07/27/13	1
Vinyl chloride	U	0.00026	0.0010	mg/l		8260B	07/27/13	1
Xylenes, Total	U	0.0011	0.0030	mg/l		8260B	07/27/13	1
Surrogate Recovery								
Toluene-d8	105.			% Rec.		8260B	07/27/13	1
Dibromofluoromethane	105.			% Rec.		8260B	07/27/13	1
a,a,a-Trifluorotoluene	106.			% Rec.		8260B	07/27/13	1
4-Bromofluorobenzene	101.			% Rec.		8260B	07/27/13	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD = TRRP SDL
RDL = Reported Detection Limit = LOQ = PQL = EQL = TRRP MQL
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 07/30/13 09:32 Revised: 12/17/13 09:24

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REPORT OF ANALYSIS

Mr. Dave Rowlinson
GHD
200 John James Audubon Pkwy; Ste 10
Amherst, NY 14228

December 17, 2013

Date Received : July 25, 2013
Description : Roblin Steel

Sample ID : TRIP BLANK

Collected By : Brian Doyle
Collection Date : 07/24/13 00:00

ESC Sample # : L648419-03

Site ID :

Project # : 8612403

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
Volatile Organics								
Acetone	U	0.010	0.050	mg/l		8260B	07/27/13	1
Benzene	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
Bromochloromethane	U	0.00052	0.0010	mg/l		8260B	07/27/13	1
Bromodichloromethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Bromoform	U	0.00047	0.0010	mg/l		8260B	07/27/13	1
Bromomethane	U	0.00087	0.0050	mg/l		8260B	07/27/13	1
Carbon disulfide	U	0.00028	0.0010	mg/l		8260B	07/27/13	1
Carbon tetrachloride	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Chlorobenzene	U	0.00035	0.0010	mg/l		8260B	07/27/13	1
Chlorodibromomethane	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
Chloroethane	U	0.00045	0.0050	mg/l		8260B	07/27/13	1
Chloroform	U	0.00032	0.0050	mg/l		8260B	07/27/13	1
Chloromethane	U	0.00028	0.0025	mg/l		8260B	07/27/13	1
Cyclohexane	U	0.00039	0.0010	mg/l		8260B	07/27/13	1
1,2-Dibromo-3-Chloropropane	U	0.0013	0.0050	mg/l		8260B	07/27/13	1
1,2-Dibromoethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichlorobenzene	U	0.00035	0.0010	mg/l		8260B	07/27/13	1
1,3-Dichlorobenzene	U	0.00022	0.0010	mg/l		8260B	07/27/13	1
1,4-Dichlorobenzene	U	0.00027	0.0010	mg/l		8260B	07/27/13	1
Dichlorodifluoromethane	U	0.00055	0.0050	mg/l		8260B	07/27/13	1
1,1-Dichloroethane	U	0.00026	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichloroethane	U	0.00036	0.0010	mg/l		8260B	07/27/13	1
1,1-Dichloroethene	U	0.00040	0.0010	mg/l		8260B	07/27/13	1
cis-1,2-Dichloroethene	U	0.00026	0.0010	mg/l		8260B	07/27/13	1
trans-1,2-Dichloroethene	U	0.00040	0.0010	mg/l		8260B	07/27/13	1
1,2-Dichloropropane	U	0.00031	0.0010	mg/l		8260B	07/27/13	1
cis-1,3-Dichloropropene	U	0.00042	0.0010	mg/l		8260B	07/27/13	1
trans-1,3-Dichloropropene	U	0.00042	0.0010	mg/l		8260B	07/27/13	1
Ethylbenzene	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
2-Hexanone	U	0.0038	0.010	mg/l		8260B	07/27/13	1
Isopropylbenzene	U	0.00033	0.0010	mg/l		8260B	07/27/13	1
2-Butanone (MEK)	U	0.0039	0.010	mg/l	J3	8260B	07/27/13	1
Methyl Acetate	U	0.0043	0.020	mg/l		8260B	07/27/13	1
Methyl Cyclohexane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Methylene Chloride	U	0.0010	0.0050	mg/l		8260B	07/27/13	1
4-Methyl-2-pentanone (MIBK)	U	0.0021	0.010	mg/l		8260B	07/27/13	1
Methyl tert-butyl ether	U	0.00037	0.0010	mg/l		8260B	07/27/13	1
Styrene	U	0.00031	0.0010	mg/l		8260B	07/27/13	1
1,1,2,2-Tetrachloroethane	U	0.00058	0.0010	mg/l		8260B	07/27/13	1
Tetrachloroethene	U	0.00037	0.0010	mg/l		8260B	07/27/13	1
Toluene	U	0.00078	0.0050	mg/l		8260B	07/27/13	1
1,2,3-Trichlorobenzene	U	0.00023	0.0010	mg/l		8260B	07/27/13	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD = TRRP SDL
RDL = Reported Detection Limit = LOQ = PQL = EQL = TRRP MQL
Note:
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REPORT OF ANALYSIS

Mr. Dave Rowlinson
GHD
200 John James Audubon Pkwy; Ste 10
Amherst, NY 14228

December 17, 2013

ESC Sample # : L648419-03

Date Received : July 25, 2013
Description : Roblin Steel

Site ID :

Sample ID : TRIP BLANK

Project # : 8612403

Collected By : Brian Doyle
Collection Date : 07/24/13 00:00

Parameter	Result	MDL	RDL	Units	Qualifier	Method	Date	Dil.
1,2,4-Trichlorobenzene	U	0.00021	0.0010	mg/l		8260B	07/27/13	1
1,1,1-Trichloroethane	U	0.00032	0.0010	mg/l		8260B	07/27/13	1
1,1,2-Trichloroethane	U	0.00038	0.0010	mg/l		8260B	07/27/13	1
Trichloroethene	U	0.00040	0.0010	mg/l		8260B	07/27/13	1
Trichlorofluoromethane	U	0.0012	0.0050	mg/l		8260B	07/27/13	1
1,1,2-Trichlorotrifluoroethane	U	0.00030	0.0010	mg/l		8260B	07/27/13	1
Vinyl chloride	U	0.00026	0.0010	mg/l		8260B	07/27/13	1
Xylenes, Total	U	0.0011	0.0030	mg/l		8260B	07/27/13	1
Surrogate Recovery								
Toluene-d8	106.			% Rec.		8260B	07/27/13	1
Dibromofluoromethane	104.			% Rec.		8260B	07/27/13	1
a,a,a-Trifluorotoluene	106.			% Rec.		8260B	07/27/13	1
4-Bromofluorobenzene	105.			% Rec.		8260B	07/27/13	1

U = ND (Not Detected)
MDL = Minimum Detection Limit = LOD = TRRP SDL
RDL = Reported Detection Limit = LOQ = PQL = EQL = TRRP MQL
Note:
The reported analytical results relate only to the sample submitted.

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Reported: 07/30/13 09:32 Revised: 12/17/13 09:24

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Quality Control Summary
SDG: L648419
GHD

Test: Volatile Organic Compounds by Method 8260B
Project No: 8612403
Project: Roblin Steel
Collection Date: 7/24/2013
Analysis Date: 7/27/2013
Instrument ID: VOCMS14
Sample Numbers: L648419-01, -02, -03

Matrix: Water - mg/L
EPA ID: TN00003
Analytic Batch: WG673961
Analyst: 563

Method Blank

Analyte	CAS	RDL	MDL	Qualifier
1,1,1-Trichloroethane	71-55-6	< 0.00100	< 0.000319	
1,1,2,2-Tetrachloroethane	79-34-5	< 0.00100	< 0.000585	
1,1,2-Trichloroethane	79-00-5	< 0.00100	< 0.000383	
1,1,2-Trichlorotrifluoroethane	76-13-1	< 0.00100	< 0.000303	
1,1-Dichloroethane	75-34-3	< 0.00100	< 0.000259	
1,1-Dichloroethene	75-35-4	< 0.00100	< 0.000398	
1,2,3-Trichlorobenzene	87-61-6	< 0.00100	< 0.000230	
1,2,4-Trichlorobenzene	120-82-1	< 0.00100	< 0.000214	
1,2-Dibromo-3-Chloropropane	96-12-8	< 0.00500	< 0.00133	
1,2-Dibromoethane	106-93-4	< 0.00100	< 0.000381	
1,2-Dichlorobenzene	95-50-1	< 0.00100	< 0.000349	
1,2-Dichloroethane	107-06-2	< 0.00100	< 0.000361	
1,2-Dichloropropane	78-87-5	< 0.00100	< 0.000306	
1,3-Dichlorobenzene	541-73-1	< 0.00100	< 0.000220	
1,4-Dichlorobenzene	106-46-7	< 0.00100	< 0.000274	
2-Butanone (MEK)	78-93-3	< 0.0100	< 0.00393	
2-Hexanone	591-78-6	< 0.0100	< 0.00382	
4-Methyl-2-pentanone (MIBK)	108-10-1	< 0.0100	< 0.00214	
Acetone	67-64-1	< 0.0500	< 0.0100	
Benzene	71-43-2	< 0.00100	< 0.000331	
Bromochloromethane	74-97-5	< 0.00100	< 0.000520	
Bromodichloromethane	75-27-4	< 0.00100	< 0.000380	
Bromoform	75-25-2	< 0.00100	< 0.000469	
Bromomethane	74-83-9	< 0.00500	< 0.000866	
Carbon disulfide	75-15-0	< 0.00100	< 0.000275	
Carbon tetrachloride	56-23-5	< 0.00100	< 0.000379	
Chlorobenzene	108-90-7	< 0.00100	< 0.000348	
Chlorodibromomethane	124-48-1	< 0.00100	< 0.000327	
Chloroethane	75-00-3	< 0.00500	< 0.000453	
Chloroform	67-66-3	< 0.00500	< 0.000324	
Chloromethane	74-87-3	< 0.00250	< 0.000276	
cis-1,2-Dichloroethene	156-59-2	< 0.00100	< 0.000260	
cis-1,3-Dichloropropene	10061-01-5	< 0.00100	< 0.000418	
Cyclohexane	110-82-7	< 0.00100	< 0.000390	
Dichlorodifluoromethane	75-71-8	< 0.00500	< 0.000551	
Ethylbenzene	100-41-4	< 0.00100	< 0.000384	
Isopropylbenzene	98-82-8	< 0.00100	< 0.000326	

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Quality Control Summary
SDG: L648419
GHD

Test:	Volatile Organic Compounds by Method 8260B		
Project No:	8612403	Matrix:	Water - mg/L
Project:	Roblin Steel	EPA ID:	TN00003
Collection Date:	7/24/2013	**Analytic Batch:**	**WG673961**
Analysis Date:	7/27/2013	Analyst:	563
Instrument ID:	VOCMS14		
Sample Numbers:	L648419-01, -02, -03		

Method Blank

Analyte	CAS	RDL	MDL	Qualifier
Methyl Acetate	79-20-9	< 0.0200	< 0.00430	
Methyl Cyclohexane	108-87-2	< 0.00100	< 0.000380	
Methyl tert-butyl ether	1634-04-4	< 0.00100	< 0.000367	
Methylene Chloride	75-09-2	< 0.00500	< 0.00100	
Styrene	100-42-5	< 0.00100	< 0.000307	
Tetrachloroethene	127-18-4	< 0.00100	< 0.000372	
Toluene	108-88-3	< 0.00500	< 0.000780	
trans-1,2-Dichloroethene	156-60-5	< 0.00100	< 0.000396	
trans-1,3-Dichloropropene	10061-02-6	< 0.00100	< 0.000419	
Trichloroethene	79-01-6	< 0.00100	< 0.000398	
Trichlorofluoromethane	75-69-4	< 0.00500	< 0.00120	
Vinyl chloride	75-01-4	< 0.00100	< 0.000259	
Xylenes, Total	1330-20-7	< 0.00300	< 0.00106	

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Quality Control Summary
SDG: L648419
GHD

Test: Volatile Organic Compounds by Method 8260B
Project No: 8612403
Project: Roblin Steel
Collection Date: 7/24/2013
Analysis Date: 7/27/2013
Instrument ID: VOCMS14
Sample Numbers: L648419-01, -02, -03

Matrix: Water - mg/L
EPA ID: TN00003
Analytic Batch: WG673961
Analyst: 563

Laboratory Control Sample (LCS)

Analyte	Dil	True Value	Found	% Rec	Control Limits	Qual
1,1,1-Trichloroethane	1	0.025	0.0266	106	71 - 126	
1,1,2,2-Tetrachloroethane	1	0.025	0.0254	102	78 - 130	
1,1,2-Trichloroethane	1	0.025	0.0243	97.1	81 - 121	
1,1,2-Trichlorotrifluoroethane	1	0.025	0.0272	109	53 - 143	
1,1-Dichloroethane	1	0.025	0.0272	109	73 - 123	
1,1-Dichloroethene	1	0.025	0.0284	114	54 - 134	
1,2,3-Trichlorobenzene	1	0.025	0.0280	112	77 - 130	
1,2,4-Trichlorobenzene	1	0.025	0.0291	116	76 - 127	
1,2-Dibromo-3-Chloropropane	1	0.025	0.0294	118	55 - 142	
1,2-Dibromoethane	1	0.025	0.0255	102	78 - 124	
1,2-Dichlorobenzene	1	0.025	0.0261	104	82 - 121	
1,2-Dichloroethane	1	0.025	0.0248	99.1	69 - 128	
1,2-Dichloropropane	1	0.025	0.0263	105	77 - 121	
1,3-Dichlorobenzene	1	0.025	0.0251	100	77 - 127	
1,4-Dichlorobenzene	1	0.025	0.0254	102	79 - 117	
2-Butanone (MEK)	1	0.125	0.1782	143	58 - 144	
2-Hexanone	1	0.125	0.1415	113	62 - 144	
4-Methyl-2-pentanone (MIBK)	1	0.125	0.1464	117	58 - 147	
Acetone	1	0.125	0.1607	129	49 - 153	
Benzene	1	0.025	0.0264	106	72 - 119	
Bromochloromethane	1	0.025	0.0261	104	79 - 124	
Bromodichloromethane	1	0.025	0.0252	101	75 - 127	
Bromoform	1	0.025	0.0257	103	61 - 136	
Bromomethane	1	0.025	0.0304	122	42 - 172	
Carbon disulfide	1	0.025	0.0296	118	19 - 150	
Carbon tetrachloride	1	0.025	0.0264	106	63 - 129	
Chlorobenzene	1	0.025	0.0251	100	78 - 123	
Chlorodibromomethane	1	0.025	0.0254	102	73 - 128	
Chloroethane	1	0.025	0.0284	114	52 - 164	
Chloroform	1	0.025	0.0272	109	76 - 122	
Chloromethane	1	0.025	0.0296	118	50 - 141	
cis-1,2-Dichloroethene	1	0.025	0.0266	106	75 - 121	
cis-1,3-Dichloropropene	1	0.025	0.0261	104	74 - 124	
Dichlorodifluoromethane	1	0.025	0.0288	115	33 - 173	
Ethylbenzene	1	0.025	0.0262	105	77 - 124	
Isopropylbenzene	1	0.025	0.0282	113	74 - 126	

Parameters in bold text are reported in this SDG

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Quality Control Summary
SDG: L648419
GHD

Test:	Volatile Organic Compounds by Method 8260B		
Project No:	8612403	Matrix:	Water - mg/L
Project:	Roblin Steel	EPA ID:	TN00003
Collection Date:	7/24/2013	**Analytic Batch:**	**WG673961**
Analysis Date:	7/27/2013	Analyst:	563
Instrument ID:	VOCMS14		
Sample Numbers:	L648419-01, -02, -03		

Laboratory Control Sample (LCS)

Analyte	Dil	True Value	Found	% Rec	Control Limits	Qual
Methyl tert-butyl ether	1	0.025	0.0283	113	67 - 127	
Methylene Chloride	1	0.025	0.0275	110	67 - 122	
Styrene	1	0.025	0.0264	106	69 - 145	
Tetrachloroethene	1	0.025	0.0254	102	69 - 131	
Toluene	1	0.025	0.0262	105	75 - 114	
trans-1,2-Dichloroethene	1	0.025	0.0271	108	63 - 127	
trans-1,3-Dichloropropene	1	0.025	0.0259	104	69 - 124	
Trichloroethene	1	0.025	0.0263	105	69 - 131	
Trichlorofluoromethane	1	0.025	0.0293	117	53 - 161	
Vinyl chloride	1	0.025	0.0294	118	55 - 142	
Xylenes, Total	1	0.075	0.0766	102	77 - 123	

Parameters in bold text are reported in this SDG

ESC LAB SCIENCES
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Mt. Juliet, TN 37122
(615) 758-5858
(800) 767-5859
Fax (615) 758-5859
Tax I.D 62-0814289
Est. 1970

Quality Control Summary
SDG: L648419
GHD

Test: Volatile Organic Compounds by Method 8260B
Project No: 8612403
Project: Roblin Steel
Collection Date: 7/24/2013
Analysis Date: 7/27/2013
Instrument ID: VOCMS14
Sample Numbers: L648419-01, -02, -03

Matrix: Water - mg/L
EPA ID: TN00003
Analytic Batch: WG673961
Analyst: 563

Laboratory Control Sample Duplicate (LCSD)

Analyte	Dil	True Value	Found	% Rec	Control Limits	Qual
1,1,1-Trichloroethane	1	0.025	0.0265	106	71 - 126	
1,1,2,2-Tetrachloroethane	1	0.025	0.0252	101	78 - 130	
1,1,2-Trichloroethane	1	0.025	0.0257	103	81 - 121	
1,1,2-Trichlorotrifluoroethane	1	0.025	0.0249	99.8	53 - 143	
1,1-Dichloroethane	1	0.025	0.0265	106	73 - 123	
1,1-Dichloroethene	1	0.025	0.0277	111	54 - 134	
1,2,3-Trichlorobenzene	1	0.025	0.0256	102	77 - 130	
1,2,4-Trichlorobenzene	1	0.025	0.0269	108	76 - 127	
1,2-Dibromo-3-Chloropropane	1	0.025	0.0254	102	55 - 142	
1,2-Dibromoethane	1	0.025	0.0257	103	78 - 124	
1,2-Dichlorobenzene	1	0.025	0.0247	98.8	82 - 121	
1,2-Dichloroethane	1	0.025	0.0240	96.2	69 - 128	
1,2-Dichloropropane	1	0.025	0.0258	103	77 - 121	
1,3-Dichlorobenzene	1	0.025	0.0254	102	77 - 127	
1,4-Dichlorobenzene	1	0.025	0.0251	100	79 - 117	
2-Butanone (MEK)	1	0.125	0.1278	102	58 - 144	
2-Hexanone	1	0.125	0.1365	109	62 - 144	
4-Methyl-2-pentanone (MIBK)	1	0.125	0.1333	107	58 - 147	
Acetone	1	0.125	0.1427	114	49 - 153	
Benzene	1	0.025	0.0262	105	72 - 119	
Bromochloromethane	1	0.025	0.0242	97	79 - 124	
Bromodichloromethane	1	0.025	0.0242	96.9	75 - 127	
Bromoform	1	0.025	0.0256	102	61 - 136	
Bromomethane	1	0.025	0.0289	116	42 - 172	
Carbon disulfide	1	0.025	0.0283	113	19 - 150	
Carbon tetrachloride	1	0.025	0.0251	101	63 - 129	
Chlorobenzene	1	0.025	0.0256	103	78 - 123	
Chlorodibromomethane	1	0.025	0.0256	102	73 - 128	
Chloroethane	1	0.025	0.0274	109	52 - 164	
Chloroform	1	0.025	0.0264	105	76 - 122	
Chloromethane	1	0.025	0.0283	113	50 - 141	
cis-1,2-Dichloroethene	1	0.025	0.0256	102	75 - 121	
cis-1,3-Dichloropropene	1	0.025	0.0260	104	74 - 124	
Dichlorodifluoromethane	1	0.025	0.0272	109	33 - 173	
Ethylbenzene	1	0.025	0.0267	107	77 - 124	
Isopropylbenzene	1	0.025	0.0283	113	74 - 126	

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Est. 1970

Quality Control Summary
SDG: L648419
GHD

Test:	Volatile Organic Compounds by Method 8260B		
Project No:	8612403	Matrix:	Water - mg/L
Project:	Roblin Steel	EPA ID:	TN00003
Collection Date:	7/24/2013	**Analytic Batch:**	**WG673961**
Analysis Date:	7/27/2013	Analyst:	563
Instrument ID:	VOCMS14		
Sample Numbers:	L648419-01, -02, -03		

Laboratory Control Sample Duplicate (LCSD)

Analyte	Dil	True Value	Found	% Rec	Control Limits	Qual
Methyl tert-butyl ether	1	0.025	0.0259	104	67 - 127	
Methylene Chloride	1	0.025	0.0267	107	67 - 122	
Styrene	1	0.025	0.0268	107	69 - 145	
Tetrachloroethene	1	0.025	0.0262	105	69 - 131	
Toluene	1	0.025	0.0260	104	75 - 114	
trans-1,2-Dichloroethene	1	0.025	0.0265	106	63 - 127	
trans-1,3-Dichloropropene	1	0.025	0.0254	102	69 - 124	
Trichloroethene	1	0.025	0.0261	105	69 - 131	
Trichlorofluoromethane	1	0.025	0.0275	110	53 - 161	
Vinyl chloride	1	0.025	0.0277	111	55 - 142	
Xylenes, Total	1	0.075	0.0783	104	77 - 123	

Parameters in bold text are reported in this SDG

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(800) 767-5859
Fax (615) 758-5859
Tax I.D 62-0814289
Est. 1970

Quality Control Summary
SDG: L648419

For: GHD
Project: Roblin Steel
December 31, 2013

Sample Receiving and Handling

All sample aliquots were received at the correct temperature, in the proper containers, and with the appropriate preservatives. All method specified holding times were met.

Volatile Organic Compounds by Method 8260B

Laboratory Control Sample

Samples L648419-01, -02, and -03 were analyzed in analytical batch WG673961. The laboratory control sample associated with these samples was within the laboratory control limits for all target analytes reported from this batch. The relative percent difference exceeded laboratory limits for 2-Butanone (MEK).

Matrix Spike/Matrix Spike Duplicate

For analytical batch WG673961 matrix spike/matrix spike duplicate analysis was performed on sample L648412-01. The matrix spike recoveries and relative percent differences were within laboratory control limits for all target analytes reported from this batch.

Blank Analysis

The method blank, the initial, and all continuing calibration blanks contained no analytes at concentrations above the method reporting limit.

Calibration Summary

Instrument VOCMS14 was calibrated on 7/15/2013. The initial calibration and continuing calibration verification standards were within method limits.

Instrument VOCMS26 was calibrated on 7/24/2013. The initial calibration and continuing calibration verification standards were within method limits.

Surrogate Summary

The surrogate recoveries were within method limits for all samples.

Internal Standards

The internal standard responses and retention times were within method limits for all samples and quality control samples.

Nancy F. McLain
ESC Representative
ESC Lab Sciences

Environmental Science Corporation
12065 Lebanon Rd., Mt. Juliet, TN 37122

Injection Log

Instrument ID : VOCMS14 | Released By : Ben Baker | Run ID : 072713
Computer Name : VOCCOMPU | Date Released : 7/28/2013 11:27:00 AM | Signature : _____

	#	Field ID	Sample ID	Method	WG	Product	Matrix	Analyte	Fill	Mult	Injected
	1	0727_01	INSTBLK	V814G15M					1	1	07/27/13 0008
	2	0727_01T	INSTBLK VMS							1	07/27/13 0008
	3	0727_02	ICV VMS 25 PPB 13G27900	V814G15M					1	1	07/27/13 0027
	4	0727_03	LCS	V814G15M	WG673961		GW		1	1	07/27/13 0101
	5	0727_04	LCSD	V814G15M	WG673961		GW		1	1	07/27/13 0118
DNR	6	0727_05	DNR MS	V814G15M	WG673961				10	10	07/27/13 0148
DNR	7	0727_06	DNR MSD	V814G15M	WG673961				10	10	07/27/13 0206
	8	0727_07	1 PPB	V814G15M					1	1	07/27/13 0224
	9	0727_08	INSTBLK	V814G15M					1	1	07/27/13 0242
	10	0727_09	BLANK	V814G15M	WG673961		GW		1	1	07/27/13 0308
	11	0727_10	L648419-03	V814G15M	WG673961	V8260TCL	GW	STEARNSANY	1	1	07/27/13 0334
DNR	12	0727_11	DNR L648412-01	V814G15M	WG673961				10	10	07/27/13 0352
DNR	13	0727_12	L648392-01	V814G15M	WG673961	V8260OXY	GW	DELTAUT	200	200	07/27/13 0410
Detach	14	0727_13	L648392-02	V814G15M	WG673961	V8260OXY	GW	DELTAUT	1	1	07/27/13 0428
DNR	15	0727_14	DNR L648404-01	V814G15M	WG673961				50	50	07/27/13 0446
DNR	16	0727_15	DNR L648412-02	V814G15M	WG673961				250	250	07/27/13 0503
	17	0727_16	L648419-01	V814G15M	WG673961	V8260TCL	GW	STEARNSANY	1	1	07/27/13 0521
	18	0727_17	L648419-02	V814G15M	WG673961	V8260TCL	GW	STEARNSANY	1	1	07/27/13 0539
	19	0727_18	L648426-01	V814G15M	WG673961	V8260OXY	GW	CORENVWVCK	10	10	07/27/13 0557
DNR	20	0727_19	DNR L648426-02	V814G15M	WG673961				25	25	07/27/13 0614
Detach	21	0727_20	L648427-01	V814G15M	WG673961	V8260OXY	GW	CORENVWVCK	5	5	07/27/13 0632
Detach	22	0727_21	L648427-02	V814G15M	WG673961	V8260OXY	GW	CORENVWVCK	10	10	07/27/13 0650
Detach	23	0727_22	L648427-03	V814G15M	WG673961	V8260OXY	GW	CORENVWVCK	1	1	07/27/13 0708
	24	0727_23	L648427-04	V814G15M	WG673961	V8260OXY	GW	CORENVWVCK	10	10	07/27/13 0726
	25	0727_24	L648427-05	V814G15M	WG673961	V8260OXY	GW	CORENVWVCK	1	1	07/27/13 0743
	26	0727_25	L648427-06	V814G15M	WG673961	V8260OXY	GW	CORENVWVCK	1	1	07/27/13 0803
	27	0727_26	[redacted]-08	V814G15M	WG673961	V8260AP1	GW	GENENLAR	1	1	07/27/13 0821
	28	0727_27	L648477-03	V814G15M	WG673961	V8260	GW	TERRPOR	1	1	07/27/13 0839
	29	0727_28	L648477-04	V814G15M	WG673961	V8260	GW	TERRPOR	1	1	07/27/13 0856
Detach	30	0727_29	L648491-01	V814G15M	WG673961	V8260	GW	MARENV	1	1	07/27/13 0914
	31	0727_30	INSTBLK	V814G15M					1	1	07/27/13 0955

pH IS < 2 UNLESS MARKED THEN pH IS 7

Injection Log

Instrument ID : VOCMS14 Released By : Ben Baker Run ID : 072713
Computer Name : VOCCOMPU Date Released : 7/28/2013 11:27:00 AM Signature : _____

#	File ID	Sample ID	Method	Wo	Product	Matrix	Account #	Dil	Multi	Injected
32	0727_30T	INSTBLK VMS							1	07/27/13 0955
33	0727_31	ICV GROMS 5.0 PPM 13G15200	V814G15M					1	1	07/27/13 1013
34	0727_32	LCSGRO	V814G15M	WG674060		SS		1	1	07/27/13 1031
35	0727_33	LCSDGRO	V814G15M	WG674060		SS		1	1	07/27/13 1049
36	0727_34	ICV VMS 25 PPB 13G27900	V814G15M					1	1	07/27/13 1107
37	0727_34T	ICV VMS 25 ppb 13G27900							1	07/27/13 1107
38	0727_35	LCS	V814G15M	WG674060		SS		1	1	07/27/13 1131
39	0727_36	LCSD	V814G15M	WG674060		SS		1	1	07/27/13 1148
40	0727_37	MS	V814G15M	WG674060		SS		1	1	07/27/13 1218
41	0727_38	MSD	V814G15M	WG674060		SS		1	1	07/27/13 1236
42	0727_39	MSGRO	V814G15M	WG674060		SS		1	1	07/27/13 1254
43	0727_40	MSDGRO	V814G15M	WG674060		SS		1	1	07/27/13 1311
44	0727_41	1	V814G15M					1	1	07/27/13 1329
45	0727_42	INSTBLK	V814G15M					1	1	07/27/13 1347
46	0727_43	BLANK	V814G15M	WG674060		SS		1	1	07/27/13 1405
47	0727_44	L647763-08	V814G15M	WG674060	V8260TPHKS	SS	GSIWKS	1	1	07/27/13 1433
48	0727_45	L647289-11	V814G15M	WG674060	V8260TPHKS	SS	GSIWKS	5	5	07/27/13 1451
49	0727_46	L647763-07	V814G15M	WG674060	V8260TPHKS	SS	GSIWKS	1	1	07/27/13 1508
50	0727_47	L647763-09	V814G15M	WG674060	V8260TPHKS	SS	GSIWKS	1	1	07/27/13 1526
51	0727_48	L647763-10	V814G15M	WG674060	V8260TPHKS	SS	GSIWKS	1	1	07/27/13 1544
52	0727_49	L647763-11	V814G15M	WG674060	V8260TPHKS	SS	GSIWKS	1	1	07/27/13 1602
53	0727_50	L647763-12	V814G15M	WG674060	V8260TPHKS	SS	GSIWKS	1	1	07/27/13 1722
54	0727_51	L648081-02	V814G15M	WG674060	V8260BTEXN	SS	CCIJFL	50	50	07/27/13 1740
55	0727_52	L648232-04	V814G15M	WG674060	V8260	SS	TERRLWA	39	39	07/27/13 1757
56	0727_53	L648353-01	V814G15M	WG674060	V8260BTEX	SS	OXYGJCO	5	5	07/27/13 1815
57	0727_54	L648353-02	V814G15M	WG674060	V8260BTEX	SS	OXYGJCO	5	5	07/27/13 1833
58	0727_55	L648391-01	V814G15M	WG674060	V8260BTEXN	SS	DELTAUT	500	500	07/27/13 1851
59	0727_56	L648439-02	V814G15M	WG674060	V8260	SS	KCKAN02	250	250	07/27/13 1908
60	0727_57	L648494-01	V814G15M	WG674060	V8260BTEXM	SS	SHIELDKY	1	0.71	07/27/13 1926
61	0727_58	L648494-02	V814G15M	WG674060	V8260BTEXM	SS	SHIELDKY	1	0.7	07/27/13 1944
62	0727_59	L648498-21	V814G15M	WG674060	V8260BTEXM	SS	SHIELDKY	1	0.74	07/27/13 2002

DNR

Environmental Science Corporation
12065 Lebanon Rd., Mt. Juliet, TN 37122

Injection Log

Instrument ID : VOCMS14 Released By : Ben Baker Run ID : 072713
Computer Name : VOCCOMPU Date Released : 7/28/2013 11:27:00 AM Signature : _____

	No	File ID	Sample ID	Method	Ws	Product	Mod	Account	ml	Mult	Injected
DNR	63	0727_60	L648498-22	V814G15M	WG674060	V8260BTEXM	SS	SHIELDKY	1	0.67	07/27/13 2020
	64	0727_61	L648498-23	V814G15M	WG674060	V8260BTEXM	SS	SHIELDKY	34.5	34.5	07/27/13 2037
DNR	65	0727_62	DNR L648498-24	V814G15M	WG674060				690	690	07/27/13 2055
	66	0727_63	L648498-25	V814G15M	WG674060	V8260BTEXM	SS	SHIELDKY	1	0.8	07/27/13 2113

APPENDIX F

SITE DEVELOPMENT

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

60-Day Advance Notification of Site Change of Use, Transfer of Certificate of Completion, and/or Ownership

(to be submitted to: Chief, Site Control Section, New York State Department of Environmental Conservation, Division of Environmental Remediation, 625 Broadway, Albany NY 12233-7020; at least 60 days prior to any change of use, transfer of a Certificate of Completion, or change in ownership of a site as required by 6NYCRR Part 375-1.11(d) and 375-1.9(f))

I. **Site Name:** Former Roblin Steel Site **DEC Site ID No.** B00025

II. **Contact Information of Person Submitting Notification:**

Name: Dale W. Marshall, P.E. City Engineer

Address1: 216 Payne Avenue

Address2: North Tonawanda, NY 14120

Phone: (716) 695-8565 E-mail: dalemar@northtonawanda.org

III. **Type of Change and Date:** Indicate the Type of Change(s) (check all that apply):

☒ Change in Ownership or Change in Remedial Party(ies)

☐ Transfer of Certificate of Completion (CoC)

☐ Other (e.g., any physical alteration or other change of use)

Proposed Date of Change (mm/dd/yyyy): 10/25/2010

IV. **Description:** Describe proposed change(s) indicated above. Provide maps, drawings, and/or parcel information as applicable. If "Other," explain how such change may affect the site's proposed, ongoing, or completed remedial program (attach additional sheets if needed).

See attachments including recorded deeds and diagram of parcels sold.

V. **Certification Statement:** Where the change of use results in a change in ownership or in responsibility for the proposed, ongoing, or completed remedial program for the site, the following certification must be completed (by owner or designated representative; see §375-1.11(d)(3)(i)):

I hereby certify that the prospective purchaser and/or remedial party has been provided a copy of any order, agreement, Site Management Plan, or State Assistance Contract regarding the Site's remedial program as well as a copy of all approved remedial work plans and reports.

Name: Dale W. Marshall (Signature) 2/11/13 (Date)

Dale W. Marshall (Print Name)

Address1: 216 Payne Avenue

Address2: North Tonawanda, NY 14120

Phone: (716) 695-8565 E-mail: dalemar@northtonawanda.org

Reset Page

VI. **Contact Information for New Owner, Remedial Party, or CoC Holder:** If the site will be sold or there will be a new remedial party, identify the prospective owner(s) or party(ies) along with contact information. If the site is subject to an Environmental Easement, Deed Restriction, or Site Management Plan requiring periodic certification of institutional controls/engineering controls (IC/ECs), indicate who will be the certifying party (attach additional sheets if needed).

☒ Prospective Owner ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: Idek, LLC (Mike Hacikyan, President of Aquasol Corporation)
Address1: 80 Thompson Street
Address2: North Tonawanda, NY 14120
Phone: (716) 564-8888 E-mail: mhacikyan@aquasolcorporation.com

Certifying Party Name: City of North Tonawanda
Address1: Dale W. Marshall, P.E., City Engineer
Address2: 216 Payne Avenue, North Tonawanda, NY 14120
Phone: (716) 695-8565 E-mail: dalemar@northtonawanda.org

VII. **Agreement to Notify DEC after Property Transfer/Sale:** If Section VI applies and all or part of the site will be sold, a letter to notify the DEC of the completion of the transfer must be provided. If the current owner is also the holder of a CoC for the site, the CoC should be transferred to the new owner using DEC's form found at http://www.dec.ny.gov/chemical/54736.html. This form has its own filing/recording requirements (see Part 375-1.9(f)).

Signing below indicates that a post transfer letter of notification for the sale of the property will be provided to the DEC within the specified timeframe. If the sale of the site also includes the transfer of a CoC, the DEC agrees to accept the notice given in VII.3 below in satisfaction of the post transfer notice required by VII.1 (to be submitted within 15 days of the sale of the site).

Within 30 days of the sale of the site, I agree to submit to the DEC:

1. the name and contact information for the new owner(s) (see §375-1.11(d)(3)(ii));
2. the name and contact information for any owner representative; and
3. a notice of transfer using the DEC's form found at http://www.dec.ny.gov/chemical/54736.html (see §375-1.9(f)).

Name: Dale W. Marshall (Signature) 2/11/13 (Date mm/dd/yyyy)

Dale W. Marshall, P.E. (Print Name)

Address1: City of North Tonawanda
Address2: 216 Payne Avenue, North Tonawanda, NY 14120
Phone: (716) 695-8565 E-mail: dalemar@northtonawanda.org

Reset Page

Continuation Sheet

☐ Prospective Owner/Holder ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: ______________________________

Address1: ______________________________

Address2: ______________________________

Phone: ______________ E-mail: ______________

☐ Prospective Owner/Holder ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: ______________________________

Address1: ______________________________

Address2: ______________________________

Phone: ______________ E-mail: ______________

☐ Prospective Owner/Holder ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: ______________________________

Address1: ______________________________

Address2: ______________________________

Phone: ______________ E-mail: ______________

☐ Prospective Owner/Holder ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: ______________________________

Address1: ______________________________

Address2: ______________________________

Phone: ______________ E-mail: ______________

☐ Prospective Owner/Holder ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: ______________________________

Address1: ______________________________

Address2: ______________________________

Phone: ______________ E-mail: ______________

☐ Prospective Owner/Holder ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: ______________________________

Address1: ______________________________

Address2: ______________________________

Phone: ______________ E-mail: ______________

Reset Page

west line of Oliver Street; thence S24°13'54"E along the west line of Oliver Street, 335.62 feet to the point or place of beginning, containing 3.17 acres of land, more or less.

Subject to the condition that the existing iron fence located along the west line of Oliver Street and in part along the north line of Tenth Avenue be maintained in good condition without modification or removal unless authorized in writing by the City of North Tonawanda.

Subject to easements, covenants and restrictions of record affecting the premises.

TOGETHER with the appurtenances, and all the estate and rights of the said party of the first part in and to said premises.

TO HAVE AND TO HOLD the premises herein granted unto the party of the second part, its successors and assigns forever.

AND the party of the first part covenants that the party of the first part has not done or suffered anything whereby the said premises have been encumbered in any way whatsoever, except as aforesaid.

THE party of the first part, in compliance with Section 13 of the Lien Law, will receive the consideration for this conveyance and will hold the right to receive such consideration as a trust fund to be applied first for the purpose of paying the cost of the improvement, and that the grantor will apply the same first to the payment of the cost of the improvement before using any part of the total of the same for any other purpose.

For the City of North Tonawanda

By: _____
Robert G. Ortt

STATE OF NEW YORK)
COUNTY OF NIAGARA) ss.:

On this 22nd day of October, 2010, before me the undersigned, a Notary Public in and for the State of New York, personally appeared Robert G. Ortt, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

_____

ROBERT SONDEL
NOTARY PUBLIC, State of New York
Qualified in Niagara County
My Commission Expires 3/22/14

NIAGARA COUNTY - STATE OF NEW YORK
WAYNE F. JAGOW - NIAGARA COUNTY CLERK
P.O. BOX 461, LOCKPORT, NEW YORK 14095-0461

COUNTY CLERK'S RECORDING PAGE
THIS PAGE IS PART OF THE DOCUMENT - DO NOT DETACH

RECEIPT NO. : 201060844

Clerk: BH
Instr #: 2010-17604
Rec Date: 10/25/2010 10:14:01 AM
Doc Grp: DEED
Descrip: DEED
Num Pgs: 3

Party1: CITY OF NORTH TONAWANDA
Party2: IDEK LLC
Town: NORTH TONAWANDA

Recording:

Cover Page	8.00
Recording Fee	11.00
Cultural Ed	14.25
Records Management - Coun	1.00
Records Management - Stat	4.75
RP5217 - County	9.00
RP5217 All others - State	241.00
Sub Total:	289.00
Transfer Tax	
Transfer Tax	138.00
Sub Total:	138.00
Total:	427.00

**** NOTICE: THIS IS NOT A BILL ****

***** Transfer Tax *****

Transfer Tax# : 1286

Consideration: 34100.00
Transfer Tax: 138.00

Record and Return To:

MCGEE & GELMAN
ATTORNEYS AT LAW
200 SUMMER STREET
BUFFALO NY 14222

3

201060844

2010-17604
10/25/2010 10:14:01 AM
3 Pages
DEED

Bargain & Sale Deed

Wayne F. Jagow, Niagara County Clerk

Clerk: BH

This Indenture

Made the 22nd day of October, in the year Two Thousand and Ten,

Between City of North Tonawanda, a municipal corporation organized under the Laws of the State of New York, and having its place of business at 216 Payne Avenue, City of North Tonawanda, New York 14120, party of the first part, and

IDEK, LLC, a New York limited liability company with offices at 80 Thompson Street, North Tonawanda, New York 14120, party of the second part,

Witnesseth, That the said party of the first part, in consideration of the sum of Thirty-four Thousand One Hundred Dollars ($34,100.00), lawful money of the United States, paid by the
said party of the second part, does hereby grant and release unto the said party of the second part, its successors and assigns forever,

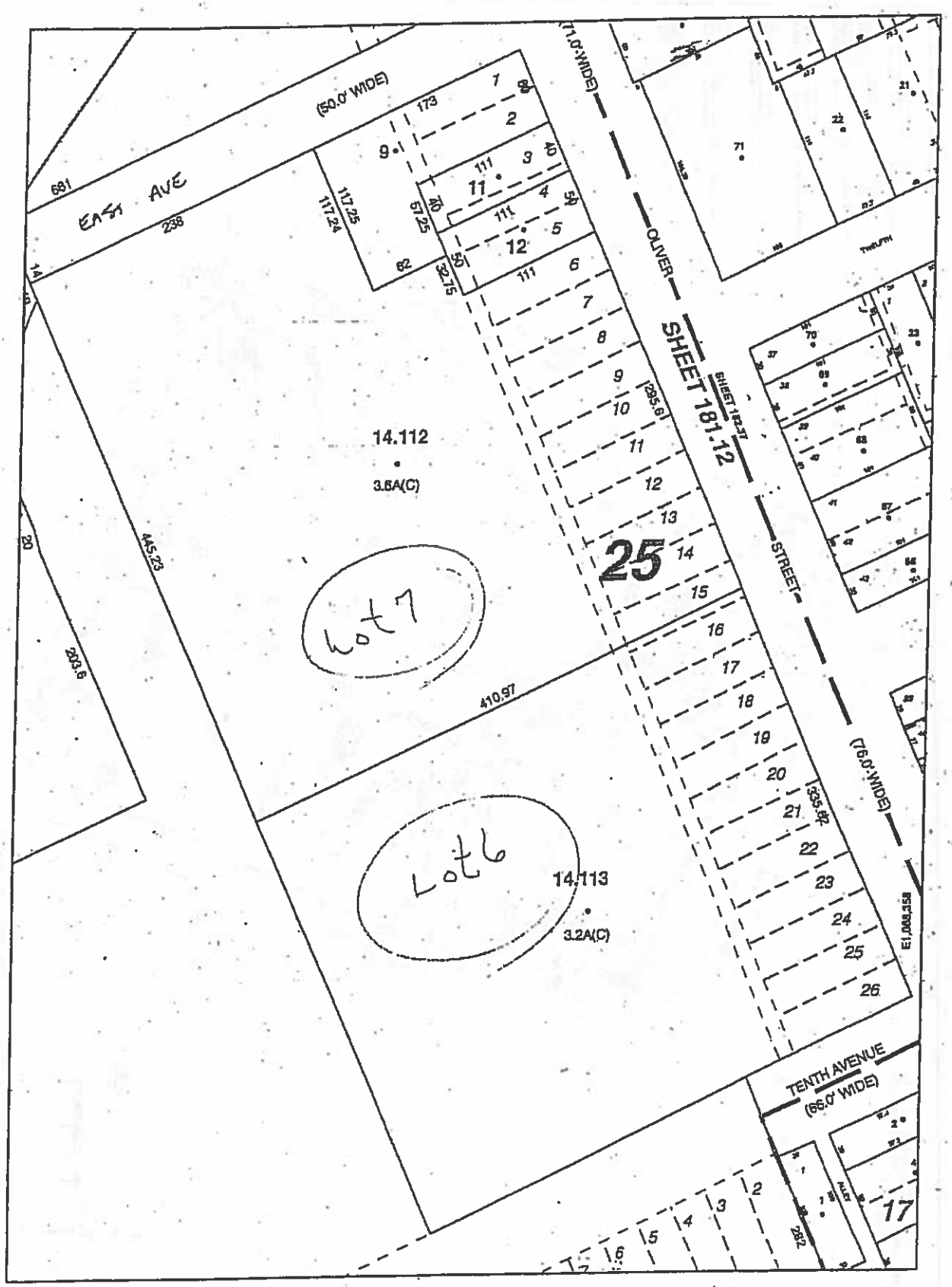
All that tract or parcel of land, situate in the City of North Tonawanda, County of Niagara and State of New York, being part of Lot 74 of the Mile Reservation, bounded and described as follows:

Beginning at a point in the west line of Oliver Street as a 76 foot wide street distant 150.00 feet southerly from the south line of East Avenue as a 50 foot wide street; thence S24°13'54"E along the west line of Oliver Street, 295.60 feet to a point; thence S65°46'06"W, 410.97 feet to a point; thence N24°13'54"W, 445.23 feet to a point in the south line of East Avenue; thence N65°43'01"E along the south line of East Avenue, 238.00 feet to a point; thence S24°13'54"E, 117.24 feet to a point; thence N65°43'01"E, 62.00 feet to a point; thence S24°13'54"E, 32.75 feet to a point; thence N65°43'01"E, 111.00 feet to the point or place of beginning, containing 3.65 acres of land, more or less.

Subject to the condition that the existing iron fence located along the west line of Oliver Street and in part along the last two courses of the above described land be maintained in good condition without modification or removal unless authorized in writing by the City of North Tonawanda.

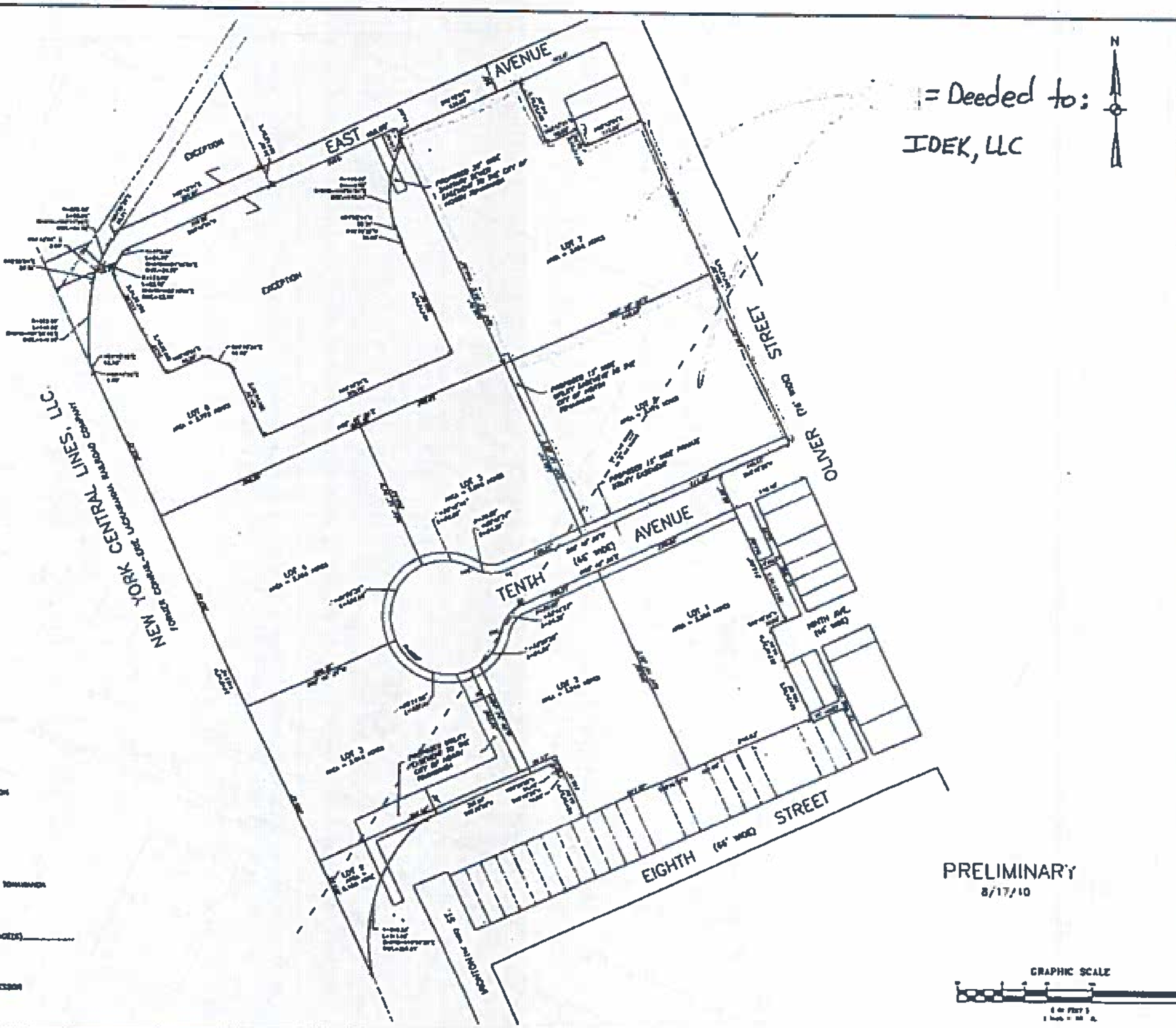
Also, all that tract or parcel of land, situate in the City of North Tonawanda, County of Niagara and State of New York, being part of Lots Nos. 74 and 75 of the Mile Reservation, bounded and described as follows:

Beginning at the point of intersect of the west line of Oliver Street as a 76 foot wide street with the north line of Tenth Avenue as a 66 foot wide street; thence S65°49'28"W along the north line of Tenth Avenue, 411.30 feet to a point; thence N24°10'32"W, 335.21 feet to a point; thence N65°46'06"E, 410.97 feet to a point in the



CNT
181.12-1-14.112, 14.113
2010-17604 10-25-10

CL 14.111 = 1067758-1105768
14.112 = 1067944-1109413
14.113 = 1068098-1109075



OWNERS CONSENT:
I HEREBY CONSENT TO THE FILING OF THIS MAP.
DATE:__________
NAME:__________

SANITARY SEWERS APPROVED BY
N.Y.S. DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DATE:__________
NAME:__________

APPROVED BY THE PLANNING COMMISSION
CITY OF NORTH TONAWANDA
DATE:__________
CHAIRMAN:__________

APPROVED BY THE CITY ENGINEERING, CITY OF NORTH TONAWANDA
DATE:__________
CITY ENGINEER:__________

FILED IN THE NIAGARA COUNTY CLERK'S
OFFICE IN BOOK______OF MICROFILMED MAPS PAGE(S)______
SLIDE NO.______
DATE:__________
COUNTY CLERK:__________

APPROVED BY THE CITY OF NORTH TONAWANDA ASSESSOR
DATE:__________
NAME:__________

CITY OF NORTH TONAWANDA — NIAGARA COUNTY — STATE OF NEW YORK

BUFFALO BOLT BUSINESS PARK SUBDIVISION

PART OF LOT NUMBERS 74 AND 75 OF THE MILE RESERVE

TVGA CONSULTANTS

SHEET REFERENCE NUMBER
60159

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

60-Day Advance Notification of Site Change of Use, Transfer of Certificate of Completion, and/or Ownership

(to be submitted to: Chief, Site Control Section, New York State Department of Environmental Conservation, Division of Environmental Remediation, 625 Broadway, Albany NY 12233-7020; at least 60 days prior to any change of use, transfer of a Certificate of Completion, or change in ownership of a site as required by 6NYCRR Part 375-1.11(d) and 375-1.9(f))

I. **Site Name:** Former Roblin Steel Site **DEC Site ID No.** B 00025

II. **Contact Information of Person Submitting Notification:**

Name: Dale W. Marshall, P.E. City Engineer

Address1: 216 Payne Avenue

Address2: North Tonawanda, NY 14120

Phone: (716) 695-8565 E-mail: dalemar@northtonawanda.org

III. **Type of Change and Date:** Indicate the Type of Change(s) (check all that apply):

☒ Change in Ownership or Change in Remedial Party(ies)

☐ Transfer of Certificate of Completion (CoC)

☐ Other (e.g., any physical alteration or other change of use)

Proposed Date of Change (mm/dd/yyyy): 02/21/2012

IV. **Description:** Describe proposed change(s) indicated above. Provide maps, drawings, and/or parcel information as applicable. If "Other," explain how such change may affect the site's proposed, ongoing, or completed remedial program (attach additional sheets if needed).

See attachments including recorded deed and diagram of parcels sold.

V. **Certification Statement:** Where the change of use results in a change in ownership or in responsibility for the proposed, ongoing, or completed remedial program for the site, the following certification must be completed (by owner or designated representative; see §375-1.11(d)(3)(i)):

I hereby certify that the prospective purchaser and/or remedial party has been provided a copy of any order, agreement, Site Management Plan, or State Assistance Contract regarding the Site's remedial program as well as a copy of all approved remedial work plans and reports.

Name: Dale W. Marshall (Signature) 2/11/13 (Date)

Dale W. Marshall (Print Name)

Address1: 216 Payne Avenue

Address2: North Tonawanda, NY 14120

Phone: (716) 695-8565 E-mail: dalemar@northtonawanda.org

Reset Page

VI. **Contact Information for New Owner, Remedial Party, or CoC Holder:** If the site will be sold or there will be a new remedial party, identify the prospective owner(s) or party(ies) along with contact information. If the site is subject to an Environmental Easement, Deed Restriction, or Site Management Plan requiring periodic certification of institutional controls/engineering controls (IC/ECs), indicate who will be the certifying party (attach additional sheets if needed).

☒ Prospective Owner ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: Taylor Devices, Inc. (Douglas P. Taylor, President)
Address1: 90 Taylor Drive, P.O. Box 748
Address2: North Tonawanda, NY 14120
Phone: (716) 694-0800 E-mail: taylordevi@aol.com

Certifying Party Name: City of North Tonawanda
Address1: Dale W. Marshall, P.E., City Engineer
Address2: 216 Payne Avenue, North Tonawanda, NY 14120
Phone: (716) 695-8565 E-mail: dalemar@northtonawanda.org

VII. **Agreement to Notify DEC after Property Transfer/Sale:** If Section VI applies and all or part of the site will be sold, a letter to notify the DEC of the completion of the transfer must be provided. If the current owner is also the holder of a CoC for the site, the CoC should be transferred to the new owner using DEC's form found at http://www.dec.ny.gov/chemical/54736.html. This form has its own filing/recording requirements (see Part 375-1.9(f)).

Signing below indicates that a post transfer letter of notification for the sale of the property will be provided to the DEC within the specified timeframe. If the sale of the site also includes the transfer of a CoC, the DEC agrees to accept the notice given in VII.3 below in satisfaction of the post transfer notice required by VII.1 (to be submitted within 15 days of the sale of the site).

Within 30 days of the sale of the site, I agree to submit to the DEC:

1. the name and contact information for the new owner(s) (see §375-1.11(d)(3)(ii));
2. the name and contact information for any owner representative; and
3. a notice of transfer using the DEC's form found at http://www.dec.ny.gov/chemical/54736.html (see §375-1.9(f))

Name: Dale W. Marshall (Signature) 2/11/13 (Date mm/dd/yyyy)

Dale W. Marshall, P.E. (Print Name)

Address1: City of North Tonawanda
Address2: 216 Payne Avenue, North Tonawanda, NY 14120
Phone: (716) 695-8565 E-mail: dalemar@northtonawanda.org

Reset Page

Continuation Sheet

☐ Prospective Owner/Holder ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: __________

Address1: __________

Address2: __________

Phone: __________ E-mail: __________

☐ Prospective Owner/Holder ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: __________

Address1: __________

Address2: __________

Phone: __________ E-mail: __________

☐ Prospective Owner/Holder ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: __________

Address1: __________

Address2: __________

Phone: __________ E-mail: __________

☐ Prospective Owner/Holder ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: __________

Address1: __________

Address2: __________

Phone: __________ E-mail: __________

☐ Prospective Owner/Holder ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: __________

Address1: __________

Address2: __________

Phone: __________ E-mail: __________

☐ Prospective Owner/Holder ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: __________

Address1: __________

Address2: __________

Phone: __________ E-mail: __________

Reset Page

2012109916

2012-03835
02/21/2012 01:35:10 PM
5 Pages
DEED

Wayne F. Jagow, Niagara County Clerk Clerk: TH

Taylor
1 Buff. Bolt

This Indenture

Made the 14th day of February, in the year Two Thousand and Twelve,

Between **City of North Tonawanda,** a municipal corporation organized under the Laws of the State of New York, and having its place of business at 216 Payne Avenue, City of North Tonawanda, New York 14120, party of the first part, and

Taylor Devices, Inc., a business corporation, organized under the laws of the State of New York, with offices at 90 Taylor Drive, North Tonawanda, New York 14120, party of the second part,

Witnesseth, That the said party of the first part, in consideration of the sum of Thirty-Seven Thousand Six Hundred Dollars ($37,600.00), lawful money of the United States, paid by the said party of the second part, does hereby grant and release unto the said party of the second part, its successors and assigns forever,

All that tract or parcel of land, situate in the City of North Tonawanda, County of Niagara and State of New York, being part of Lots 74 and 75 of the Niagara River Reservation, bounded and described as follows:

Beginning at a point in the south line of Buffalo Bolt Way (formerly Tenth Avenue, 66 feet wide), distant 140.48 feet westerly from the intersection of the south line of Buffalo Bolt Way with the west line of Oliver Street; thence South 24°24'05" East, a distance of 216.00 feet; thence South 65°49'28" West, a distance of 30.00 feet; thence South 22°19'37" West, a distance of 66.04 feet; thence South 24°24'05" East, a distance of 100.00 feet; thence South 65°49'28" West, a distance of 451.60 feet; thence North 24°20'57" West, a distance of 75.00 feet; thence South 65°49'28" West, a distance of 10 feet; thence North 24°20'57" West, a distance of 26.42 feet; thence South 65°35'20" West, a distance of 257.99 feet; thence southwesterly on a curve to the left having a radius of 290.33 feet and a chord with a bearing of South 18°59'37" West with a chord distance of 296.87 feet, a distance of 311.62 feet; thence North 24°15'45" East, a distance of 531.15 feet; thence North 65°49'27" East, a distance of 298.35 feet to a point in Buffalo Bolt Way; thence along a curve to the left having a radius of 100.00 feet and along the south line of Buffalo Bolt Way, a distance of 249.07 feet to a point of reverse curvature in the south line of Buffalo Bolt Way; thence northeasterly along a curve to the right having a radius of 70.00 feet and along the south line of Buffalo Bolt Way, a distance of 64.39 feet to a point of tangency thereon; thence N 65°49'28" E along the south line of Buffalo Bolt Way, a distance of 421.10 feet to the principal point or place of beginning.

The party of the first part hereby quit claims to the party of the second part all of its right, title and interest, if any, in and to those lands which lie south, southeast and southwest of the lands above described and north, northeast and northwest of lands

conveyed to the party of the second part by deed recorded in the Niagara County Clerk's Office on December 27, 2011 as instrument no. 2011-23527.

Reserving unto the party of the first part, an easement solely for utility purposes as shown on a Survey prepared by TVGA Consultants on September 19, 2011, Job No. 2009-0036-00 and attached hereto as Schedule "A" and made a part hereof, the terms of which easement are more fully set forth in that certain sewer line easement agreement dated on or about the date hereof between the party of the first part and the party of the second part, ~~a copy of which is attached hereto as Exhibit A and made a part hereof.~~ recorded simultaneously herewith in Liber ~~of~~ of ~~at page~~ Instrument #2012-03834 of Deeds

TOGETHER with the appurtenances, and all the estate and rights of the said party of the first part in and to said premises.

TO HAVE AND TO HOLD the premises herein granted unto the party of the second part, its successors and assigns forever.

AND the party of the first part covenants with the party of the second part as follows:

THAT party of the second part shall quietly enjoy the said premises.

THAT party of the first part will forever warrant the title to said premises.

THE party of the first part, in compliance with Section 13 of the Lien Law, will receive the consideration for this conveyance and will hold the right to receive such consideration as a trust fund to be applied first for the purpose of paying the cost of the improvement, and that the grantor will apply the same first to the payment of the cost of the improvement before using any part of the total of the same for any other purpose.

In Presence of

For the City of North Tonawanda

By: _____
Robert G. Ortt, Mayor

STATE OF NEW YORK)
COUNTY OF NIAGARA) ss.:

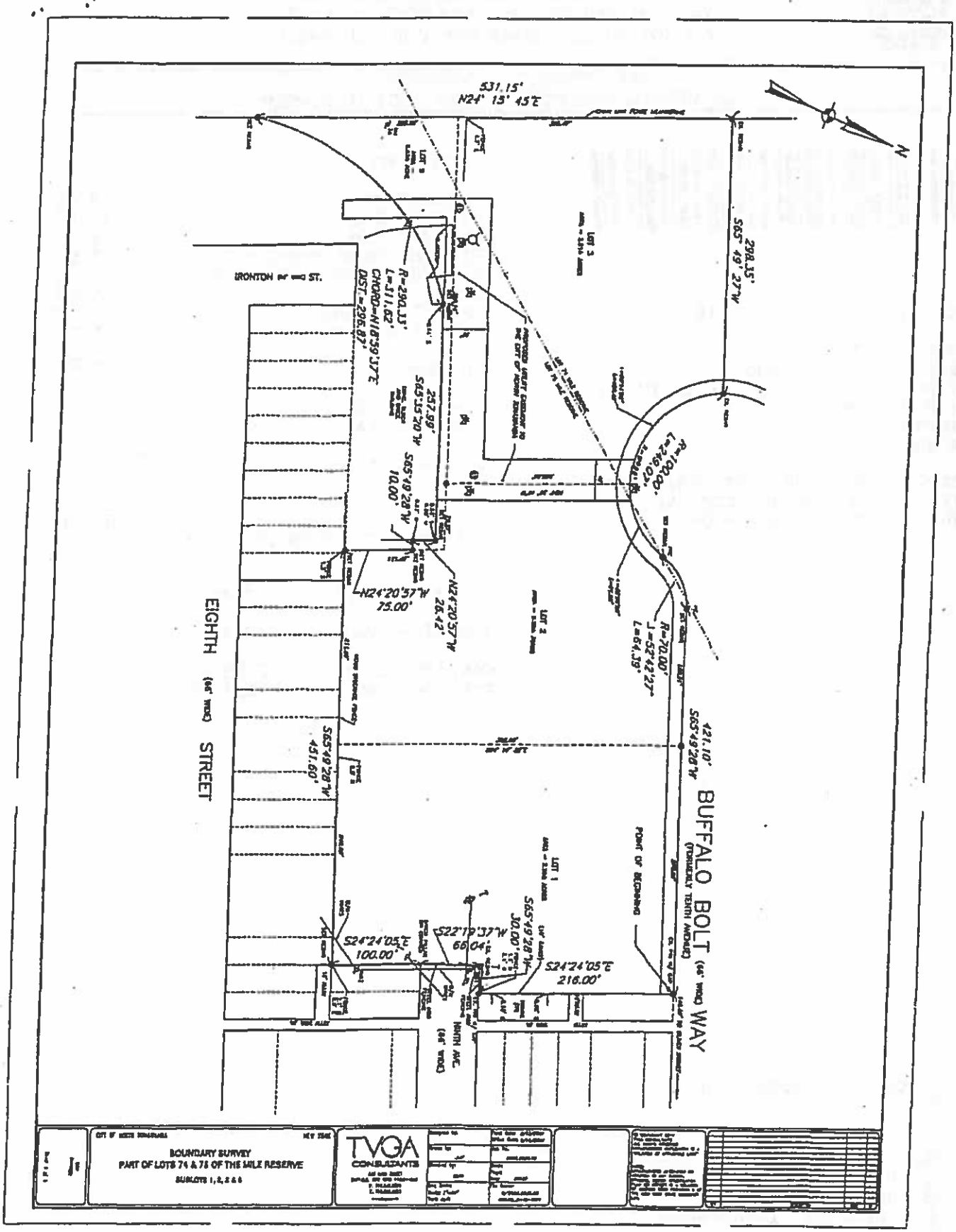
On this 14th day of February, 2012, before me the undersigned, a Notary Public in and for the State of New York, personally appeared Robert G. Ortt, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in

his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

David R. Jakubaszek

DAVID R. JAKUBASZEK Reg. No. 4697131
Notary Public, State of New York
Appointed in Niagara County
Commission Expires August 31, 20 13

SCHEDULE A


531.15'
N24° 15' 45"E
S65° 49' 27"W
298.35'
IRONTON (66' WIDE) ST.
R=290.33'
L=311.62'
CHORD=N18°59'37"E
DIST=296.87'
S65°49'28"W
257.69'
S65°49'28"W
10.00'
R=100.00'
L=249.07'
N24°20'37"W
75.00'
N24°20'37"W
26.42'
R=20.00'
L=54°42'22"
L=64.39'
EIGHTH (66' WIDE) STREET
S65°49'28"W
451.60'
421.10'
S65°49'28"W
BUFFALO BOLT (66' WIDE) WAY
(FORMERLY TENTH AVENUE)
POINT OF BEGINNING
S24°24'05"E
100.00'
S22°19'37"W
66.04'
S65°49'28"W
30.00'
S24°24'05"E
216.00'
NINTH AVE. (66' WIDE)
N
BOUNDARY SURVEY
PART OF LOTS 74 & 75 OF THE MILE RESERVE
SUBLOTS 1, 2, 3 & 6
TVGA
CONSULTANTS

NIAGARA COUNTY - STATE OF NEW YORK
WAYNE F. JAGOW - NIAGARA COUNTY CLERK
P.O. BOX 461, LOCKPORT, NEW YORK 14095-0461

COUNTY CLERK'S RECORDING PAGE
THIS PAGE IS PART OF THE DOCUMENT - DO NOT DETACH

RECEIPT NO. : 2012109916

Clerk: TH
Instr #: 2012-03835
Rec Date: 02/21/2012 01:35:10 PM
Doc Grp: DEED
Descrip: DEED
Num Pgs: 5

Party1: CITY OF NORTH TONAWANDA
Party2: TAYLOR DEVICES INC
Town: NORTH TONAWANDA

Recording:

Cover Page	8.00
Recording Fee	17.00
Cultural Ed	14.25
Records Management - Coun	1.00
Records Management - Stat	4.75
TP584	5.00
RP5217 - County	9.00
RP5217 All others - State	241.00
Sub Total:	300.00
Transfer Tax	
Transfer Tax	152.00
Sub Total:	152.00
Total:	452.00

**** NOTICE: THIS IS NOT A BILL ****

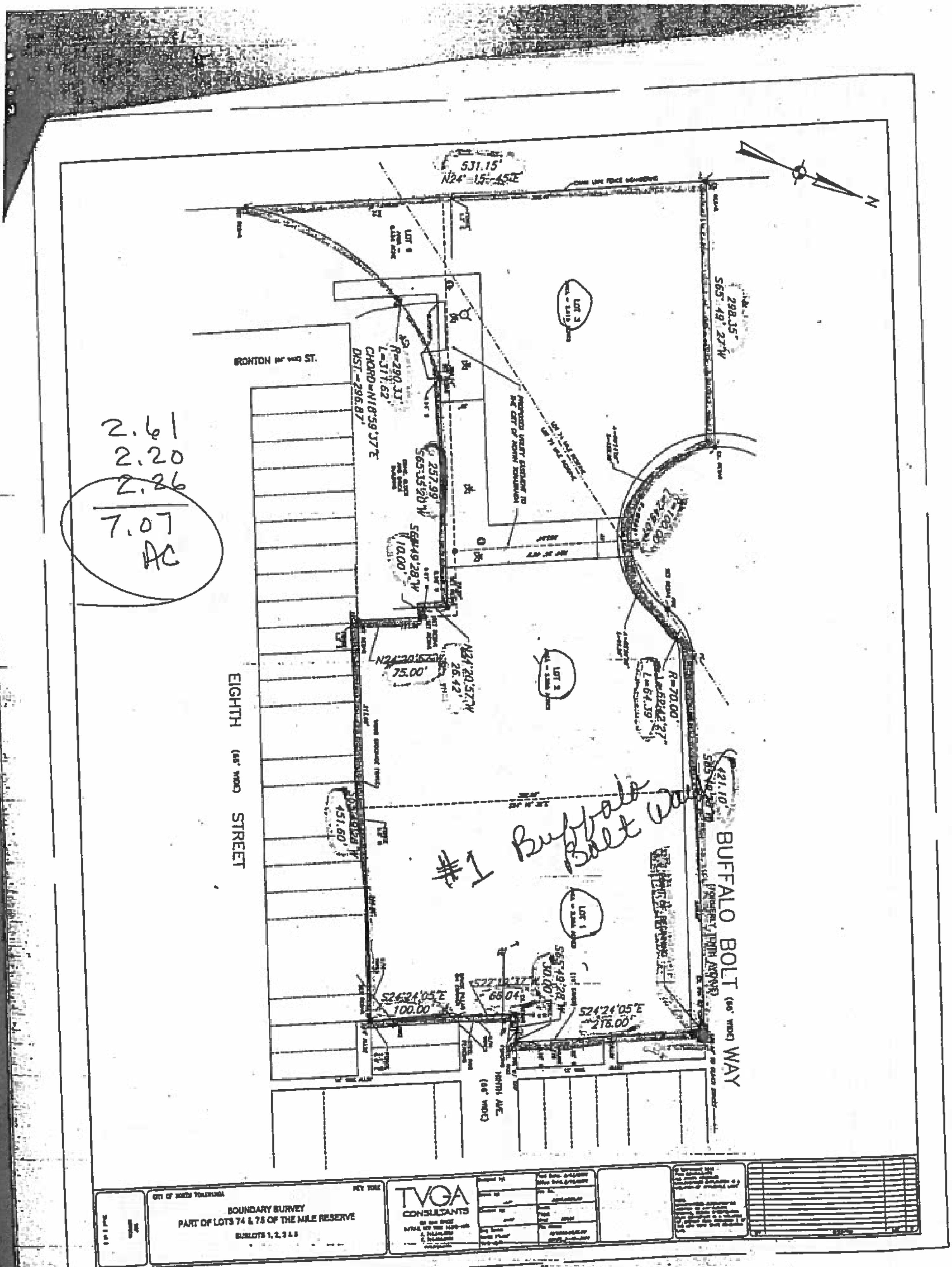
***** Transfer Tax *****

Transfer Tax# : 2743

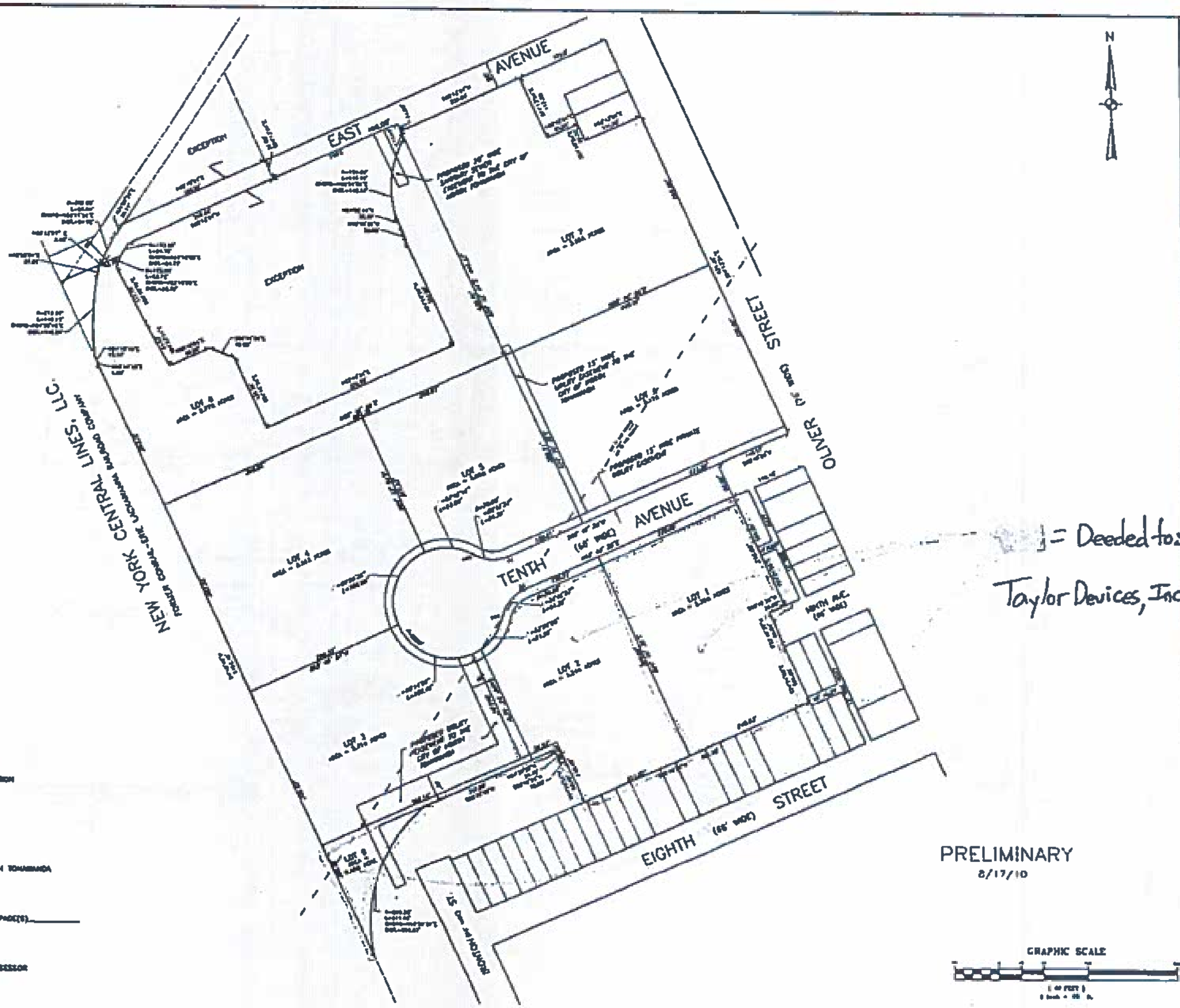
Consideration: 37600.00
Transfer Tax: 152.00

Record and Return To:

HISCOCK & BARCLAY
1100 M&T CENTER
3 FOUNTAIN PLAZA
BUFFALO, NY 14203-9859



2.61
2.20
2.26
7.07
AC
#1 Buffalo Bolt Way
531.15'
N24°15'45"E
298.35'
S65°49'27"W
LOT 3
IRONTON ST.
R=290.33'
L=311.62'
CHORD=N18°59'37"E
DIST.=296.87'
257.99'
S65°35'20"W
S68°49'28"W
10.00'
N24°20'57"W
26.42'
N24°20'57"W
75.00'
LOT 2
R=70.00'
L=64.39'
EIGHTH STREET
151.60'
421.10'
BUFFALO BOLT WAY
LOT 1
S65°49'28"W
30.00'
S27°12'17"W
68.04'
S24°24'05"E
100.00'
S24°24'05"E
216.00'
NINTH AVE.
BOUNDARY SURVEY
PART OF LOTS 74 & 75 OF THE MILE RESERVE
SUBLOTS 1, 2, 3 & 5
TVGA CONSULTANTS



OWNERS CONSENT:
I HEREBY CONSENT TO THE FILING OF THIS MAP.
DATE:__________
NAME:__________

SANITARY SEWERS APPROVED BY
N.Y.S. DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DATE:__________
NAME:__________

APPROVED BY THE PLANNING COMMISSION
CITY OF NORTH TONAWANDA
DATE:__________
CHAIRMAN:__________

APPROVED BY THE CITY ENGINEERS, CITY OF NORTH TONAWANDA
DATE:__________
CITY ENGINEER:__________

FILED IN THE NIAGARA COUNTY CLERK'S
OFFICE IN BOOK__________OF MICROFILMED MAPS PAGE(S)__________
SLIDE NO.__________
DATE:__________
COUNTY CLERK:__________

APPROVED BY THE CITY OF NORTH TONAWANDA ASSESSOR
DATE:__________
NAME:__________

CITY OF NORTH TONAWANDA — NIAGARA COUNTY — STATE OF NEW YORK

BUFFALO BOLT BUSINESS PARK SUBDIVISION

PART OF LOT NUMBERS 74 AND 75 OF THE MILE RESERVE

TVGA CONSULTANTS

60159