



# Periodic Review Report

110 Luther Avenue BCP Site  
(BCP Site #C734118)  
March 17, 2019 to March 17, 2020  
Reporting Period

Syracuse Label Company Inc.





## Executive Summary

The 110 Luther Avenue Brownfield Cleanup Program (BCP) Site (BCP Site #C734118) consists of approximately 1.40 acres of land located at 110 Luther Avenue, Town of Salina, Onondaga County, NY. The Site owner is Box Capital, LLC (Box Capital) and the Site Remedial Party is Syracuse Label Company, Inc. (Syracuse Label). The Site groundwater was historically found to be contaminated with volatile organic compounds (VOCs), primarily tetrachloroethene (PCE) and its degradation byproducts, trichloroethene (TCE), cis-1,2-dichloroethene (DCE) and vinyl chloride (VC). The Site was remediated to commercial use cleanup standards and received a Certificate of Completion (COC) from the New York State Department of Environmental Conservation (NYSDEC) on December 22, 2011. The COC was transferred to Box Capital on April 8, 2019.

The Site is currently in the site management stage in accordance with the Site Management Plan (SMP, S&W Redevelopment of NA, LLC, August 2011, Revised November 2011; Revised February 2017 and May 2019 by GHD Consulting Services Inc.). The SMP requires the maintenance and monitoring of Site institutional controls (ICs) and engineering controls (ECs).

The ICs and ECs for the Site remain in place and effective for protecting human health and the environment. Groundwater monitoring has been completed in accordance with the SMP on a semi-annual basis. Based on the groundwater monitoring data, concentrations of target compounds in groundwater have shown a notable decrease over time as a result of the remedial actions and corrective measures performed at the Site. The groundwater analytical data indicates that groundwater standards for the contaminants of concern have been achieved for a majority of the monitoring locations.

The soil cover EC remains in place and continues to effectively mitigate potential exposure to remaining contamination via direct contact with subsurface soils. During this PRR certification period, there were no reported activities at the Site that penetrated the soil cover. The sub-slab depressurization system (SSDS) EC is inspected monthly by Syracuse Label. The system was operating as intended during this PRR's certification period, with the exception of a cracked fitting and dislodged ball valve at suction riser S-14 identified during the March 2020 inspection, which is scheduled to be repaired outside of this PRR's certification period.

The identified ICs include: (1) the designated use of the property for commercial/industrial uses; (2) confirmation that the ownership of the adjacent property located at 116 Luther Avenue remains unchanged from previous uses and ownership; and (3) the prohibition of groundwater use at the Site. Syracuse Label recently sold the Site to Box Capital, who continue to use the Site for commercial purposes and are also leasing a portion of the building to UniFirst for their commercial operations. The ownership of the adjacent property located at 116 Luther Avenue remains unchanged as evidenced by information obtained from the Onondaga County Real Property Tax Services website records. The groundwater use prohibition remains in place and groundwater is not used for any purpose at the Site.



Groundwater monitoring frequency has been reduced to semi-annually (MW-1, MW-7, MW-8, MW-10, and MW-18) with field conditions (i.e., depth to groundwater and field parameters only) recorded at MW-19 on the same semi-annual frequency. Groundwater samples are analyzed for chlorinated VOCs only, in accordance with the NYSDEC-approved revised SMP (GHD Consulting Services Inc., May 2019). The requirements necessary to discontinue Site maintenance and/or monitoring have not been met at this time. There is no need to propose a change to the frequency of PRR submittals at this time.



## Table of Contents

1.	Introduction.....	1
1.1	Purpose.....	1
2.	Site Overview .....	2
3.	Institutional and Engineering Controls .....	5
3.1	Institutional Controls .....	5
3.1.1	Environmental Easement .....	5
3.1.2	Groundwater .....	5
3.1.3	Excavations .....	5
3.1.4	Site Use .....	5
3.1.5	Ownership of Adjacent Property.....	6
3.2	Engineering Controls .....	6
3.2.1	Sub-Slab Depressurization System.....	6
3.2.2	Soil Cover Engineering Control .....	7
4.	Operations and Monitoring.....	8
4.1	Groundwater Monitoring Results .....	8
4.2	Monitoring Well Decommissioning.....	10
5.	Recommendations .....	11

## Figure Index

Figure 1	Site Location Map
Figure 2	Site Layout
Figure 3	Groundwater Monitoring Results and Flow Direction
Figure 4	Sub-Slab Depressurization System Layout
Figure 5	Soil Cover Engineering Controls

## Table Index

Table 1	Groundwater Elevation Data
Table 2	Summary of Groundwater Sample Analytical Results

## Appendix Index

Appendix A	Institutional and Engineering Controls Certification Form
Appendix B	Property Ownership Information for Adjoining Property
Appendix C	Sub-Slab Depressurization System Inspection Checklists / Annual Inspection Form and Representative Photographs
Appendix D	Groundwater Sampling Waste Disposal Documentation
Appendix E	Approval Notifications for EQUIS Database Submittals
Appendix F	Time Series Plots
Appendix G	Change of Use and/or Ownership Documentation



# 1. Introduction

## 1.1 Purpose

This Periodic Review Report (PRR) is being submitted on behalf of Syracuse Label Company, Inc. (Syracuse Label), the Remedial Party, for the 110 Luther Avenue Brownfield Cleanup Program (BCP) Site (BCP Site No. C734118) located at 110 Luther Avenue, Town of Salina, Onondaga County, NY (Figure 1). The purpose of the PRR and attached documentation is to document that institutional controls (ICs) and engineering controls (ECs), as described in the New York State Department of Environmental Conservation (NYSDEC)-approved Site Management Plan (SMP) and subsequent revisions, and the Environmental Easement, are in place and functioning as intended in accordance with 6NYCRR Part 375-3. The following elements are included in this report:

1. A complete description of all ICs and ECs employed at the Site.
2. An evaluation of the plans developed for implementation of the ECs and ICs regarding the continued effectiveness of any ICs and/or ECs required by the decision document for the Site.
3. A certification prepared by a professional engineer or qualified environmental professional that the ICs and/or ECs employed at the Site during the period are:
  - Unchanged from the previous certification, unless approved by the Department, consistent with the SMP.
  - In place and effective.
  - Performing as designed, and that there has been no occurrence that would: (1) impair the ability of the controls to protect public health and environment, or (2) constitute a violation or failure to comply with any operation and maintenance plan for such controls.
4. The Institutional and Engineering Controls Certification Form as issued by the Department has been completed and included as Appendix A.
5. Data tables and figures depicting results of semi-annual groundwater monitoring activities conducted on the Site.



## 2. Site Overview

The Site is located in the Town of Salina, Onondaga County, NY and is identified as Block 12 and Lots 04.1, 05.0, 06.1, 08.0, and 09.0 on the Onondaga County Tax Map (Tax Map No. 85-12). The Site consists of approximately 1.40 acres of land bound by Albion Avenue to the northwest; Knapp Street to the northeast; Luther Avenue and a parcel operated by Brannock Devices Company, Inc. to the southeast; and an unpaved parking area operated by Bush Electronics to the southwest (see Figure 2).

The Site is currently developed with a two-story building that was historically used for Syracuse Label's office space, light manufacturing, and warehouse operations. The property was transferred from Syracuse Label to Box Capital; and the COC was subsequently transferred on April 8, 2019 (Appendix G). Currently, the property and building is owned by Box Capital, LLC who utilizes a portion of the building for a commercial lighting showroom and warehouse operations and leases a portion of the building to UniFirst for their commercial operations. The portion of the Site not occupied by the building consists of paved parking and delivery areas, with minor grass-covered landscaping areas.

The Remedial Investigation (RI) conducted under Brownfield Cleanup Agreement (BCA) Index #B7-0811-09-08 between December 2009 and November 2010 characterized the nature and extent of contamination at the Site. The results of the RI, as reported in the RI Report (S&W Redevelopment of North America, LLC [SWRNA], January 2011, Revised June 2011) determined that groundwater contamination consisting of chlorinated volatile organic solvents (primarily tetrachloroethene, trichloroethene, and their degradation products) existed in a discrete area in the eastern/central portion of the Site (Figure 3).

A Remedial Action Work Plan (RAWP) was prepared by SWRNA (June 2011, Revised September 2011) which:

1. Identified the remedial goals and remedial action objectives
2. Discussed the remedy selection
3. Summarized remedial action pilot test findings
4. Summarized the sub-slab communication testing findings
5. Outlined the remedial design for the proposed remedial approach.

The proposed remedial approach was to remediate the Site to a Track 4 Restricted Use by meeting the Commercial Use Soil Cleanup Objectives (SCOs). This approach included implementation of a groundwater remedy and engineering/institutional controls. The groundwater remedy included in-situ chemical reduction (ISCR), which consisted of injection of approximately 11,100 lbs. of a granular carbon and zero valent iron powder mixed into a slurry with potable water and approximately 12 liters of a bacterial consortium (Dehalococcoides). The groundwater remedy was completed in a discrete area of the Site between February 2011 (pilot test) and July 2011 (full scale). The ECs consisted of maintaining the soil cover system and installing a sub-slab depressurization system (SSDS) in the existing on-Site building. The ICs included a Site groundwater use restriction, a Site use restriction limiting the use to commercial or industrial uses, and a requirement to maintain the current SSDS and install a SSDS in any future buildings constructed on Site.



An Environmental Easement (EE) for the Site was filed with the Onondaga County Clerk's Office on October 21, 2011. A Site Management Plan, which outlines Site restrictions and requirements of future maintenance and monitoring, was completed in November 2011, revised in February 2017, and approved by the NYSDEC and New York State Department of Health (NYSDOH). A Certificate of Completion (COC) allowing for commercial or industrial uses of the Site was received from the NYSDEC on December 22, 2011.

Based on a review of quarterly groundwater monitoring results compiled after the issuance of the COC and discussions with the NYSDEC, Syracuse Label implemented corrective measures to address the elevated concentrations of degradation byproducts identified in samples taken from specific Site groundwater monitoring wells. Corrective measure activities were implemented in accordance with the *December 2012 Groundwater Monitoring Results and Corrective Measures Injection Work Plan* letter report (GHD Consulting Engineers, LLC, April 2013), which was submitted to and approved by the NYSDEC. The corrective measures included ISCR, which consisted of injection of a total of approximately 25,500 lbs. of a granular carbon and zero valent iron powder mixed into a slurry with potable water and a total of approximately 58.5 liters of a concentrated bacterial consortium (*Dehalococcoides*). The corrective measures were completed in four discrete areas of the Site between December 8, 2012 and February 2, 2014. Groundwater monitoring data collected since implementation of corrective measures indicate that these activities have been effective at further reducing the concentrations of target compounds in Site groundwater, and the ongoing groundwater monitoring further evaluates the effectiveness of the corrective measures. Implementation procedures and findings of the supplemental injections were reported in a separate Construction Completion Report (GHD, March 2015).

The reader of this PRR may refer to previous reports for more detail, as needed. These reports include:

- *Remedial Investigation*, Brownfield Cleanup Program, 110 Luther Avenue Site, 110 Luther Avenue, Liverpool, Onondaga County, New York, BCP Site #C734118, S&W Redevelopment of North America, LLC, January 2011, Revised: June 2011.
- *Remedial Action Work Plan*, Brownfield Cleanup Program, 110 Luther Avenue Brownfield Site, 110 Luther Avenue, Liverpool, Onondaga County, New York, S&W Redevelopment of North America, LLC, June 2011, Revised: September 2011.
- *Site Management Plan*, 110 Luther Avenue Site, Onondaga County, New York, NYSDEC Site Number: C734118, S&W Redevelopment of North America, LLC, August 2011, Revised: November 2011.
- *Final Engineering Report*, 110 Luther Avenue Site, Onondaga County, New York, NYSDEC Site Number: C734118, S&W Redevelopment of North America, LLC, September 2011, Revised: November 2011.
- *December 2012 Groundwater Monitoring Results and Corrective Measures Injection Work Plan*, 110 Luther Avenue BCP Site, Liverpool, New York, NYSDEC BCP Site #C734118, GHD Consulting Engineers, LLC, April 1, 2013.
- *Periodic Review Report – July 1, 2013 – March 17, 2014*, 110 Luther Avenue BCP Site (BCP Site #C734118), GHD Consulting Services Inc., May 2014.



- *Construction Completion Report*, 110 Luther Avenue BCP Site (Site #C734118), GHD Consulting Services Inc., March 2015.
- *Periodic Review Report – March 17, 2014 – March 17, 2015*, 110 Luther Avenue BCP Site (BCP Site #C734118), GHD Consulting Services Inc., April 13, 2015.
- *3<sup>rd</sup> and 4<sup>th</sup> Quarter 2015 Off-Site Soil Vapor Sampling Results*, 110 Luther Avenue BCP Site, GHD Consulting Services Inc., February 10, 2016.
- *Periodic Review Report – March 17, 2015 – March 17, 2016, 110 Luther Avenue BCP Site (BCP Site #C734118)*, GHD Consulting Services Inc., April 13, 2016.
- *Off-Site Soil Vapor Well Sampling*, 110 Luther Avenue BCP Site, GHD Consulting Services Inc., August 23, 2016.
- *3<sup>rd</sup> Quarter 2016 Groundwater Monitoring Results and Request to Modify the Site Monitoring Plan*, 110 Luther Avenue BCP Site, GHD Consulting Services Inc., October 12, 2016.
- *3<sup>rd</sup> Quarter 2016 Groundwater Monitoring Results and Request to Modify the Site Monitoring Plan Response Letter*, NYSDEC, November 30, 2016.
- *Site Management Plan*, Revised by: GHD Consulting Services Inc., February 2017.
- *Monitoring Well Decommissioning – 110 Luther Avenue BCP Site*, GHD Consulting Services Inc., March 7, 2017.
- *Periodic Review Report – March 17, 2016 – March 17, 2017, 110 Luther Avenue BCP Site (BCP Site #C734118)*, GHD Consulting Services Inc., April 12, 2017.
- *Periodic Review Report – March 17, 2017 – March 17, 2018, 110 Luther Avenue BCP Site (BCP Site #C734118)*, GHD Consulting Services Inc., March 30, 2018.
- *Request for Site Monitoring Reductions*, 110 Luther Avenue BCP Site, GHD Consulting Services Inc., February 26, 2019.
- *Periodic Review Report – March 17, 2018 – March 17, 2019, 110 Luther Avenue BCP Site (BCP Site #C734118)*, GHD Consulting Services Inc., April 2019.
- *2019 Monitoring Well Decommissioning*, GHD Consulting Services Inc., April 26, 2019.
- *Site Management Plan*, Revised by: GHD Consulting Services Inc., May 2019.
- *Fall 2019 Groundwater Monitoring Results*, GHD Consulting Services Inc., January 23, 2020.



### **3. Institutional and Engineering Controls**

Based on identified groundwater contamination, potential soil vapor contamination, and the Site's past and present use, ICs and ECs are utilized at the Site to limit exposure risks. An annual Site inspection was completed on March 17, 2020 (Appendix C) to observe the condition of the ICs and ECs. The ICs and ECS and their status at the time of the Site inspection are described below.

#### **3.1 Institutional Controls**

The ICs for this Site are outlined in the NYSDEC-approved SMP (SWRNA, August 2011; Revised November 2011; Revised February 2017 by GHD; Revised May 2019 by GHD), and include the following:

1. An EE filed with the Onondaga County Clerk's Office.
2. A restriction on the use of groundwater underlying the Site without treatment, rendering it safe for its intended purpose and prior written approval from the NYSDEC and NYSDOH.
3. An Excavation Work Plan providing guidance for future excavations conducted on Site.
4. A use restriction limiting future Site use to commercial or industrial without prior approval of the NYSDEC.
5. Monitoring for ownership changes of the adjacent property, 116 Luther Avenue - Tax Identification 085.-12-10.0.

##### **3.1.1 Environmental Easement**

The EE was filed with the Onondaga County Clerk's Office and remains unchanged.

##### **3.1.2 Groundwater**

Groundwater is not being used at the Site.

##### **3.1.3 Excavations**

No excavation of soil has occurred on Site during this certification period.

##### **3.1.4 Site Use**

The Site use and ownership has changed since issuance of the COC by the NYSDEC on December 22, 2011. Syracuse Label prepared a 60-Day Advance Notification of Site Change of Use, Transfer of Certificate of Completion, and/or Ownership form and submitted it to the NYSDEC on November 8, 2018. Receipt was acknowledged by NYSDEC on February 13, 2019. Syracuse Label transferred the property to the new owner, Box Capital during April 2019. The COC was transferred to Box Capital on April 8, 2019 (Appendix G).



### **3.1.5 Ownership of Adjacent Property**

Based on information from the Onondaga County Real Property Tax Services website (<https://ocfintax.ongov.net/Imate/search.aspx>) on March 25, 2020, the adjacent property located to the south of Syracuse Label has been owned by Salvatore A. Leonardi, Jr. since 1995. Based on field observations of the building signage, the property continues to be operated as Brannock Devices Company, Inc. (Appendix B).

## **3.2 Engineering Controls**

The ECs for the Site are outlined in the NYSDEC-approved SMP (SWRNA, August 2011; Revised November 2011; Revised February 2017 by GHD; Revised May 2019 by GHD), and include the following:

### **3.2.1 Sub-Slab Depressurization System**

A SSDS was installed in the existing Site building in July 2011 by Radon Home Services, Inc., a certified radon mitigation contractor. The SSDS is a high vacuum system utilizing 14 suction points positioned at locations throughout the building (Figure 4) and 2 blower fans mounted on the roof of the building. The system is designed to operate continuously to create a negative pressure differential between the sub-slab and the indoor building atmosphere in order to mitigate potential soil vapor intrusion issues. The extracted soil vapor is vented from the blower fan exhaust to the atmosphere.

System inspection forms were completed monthly by Syracuse Label personnel during the certification period, with the exception of the March 2020 inspection, which was performed by GHD on Syracuse Label's behalf (Appendix C). As indicated on the monthly inspection forms, the system was operating as intended during this PRR's certification period, with the exception of two necessary repairs to the SSDS identified during the March 17, 2020 system inspection. The March 17, 2020 inspection indicated that the ball valve in the SSDS piping leading to the southern-most blower fan, Fan 2 was dislodged and the "T" fitting was cracked and needed repair and that the supports for the PVC pipe leading to Fan 1 were in need of repair. On March 20, 2020, outside of this PRR's certification period, Box Capital personnel temporarily fixed the pipe supports leading to Fan 1 and reportedly ordered parts for a more permanent repair, which will occur at a later date. Documentation of the permanent repair will be included in next year's PRR. Box Capital intends to arrange for the repair of the broken "T" fitting and ball valve at S-14, which will occur at a later date; documentation will be included in next year's PRR. No other temporary shutdowns or repairs were reported during this PRR's certification period.

Additional information can be found on the Institutional and Engineering Controls Certification Form (Appendix A) and in the SSDS Inspection Checklists and documentation included in Appendix C.



### **3.2.2 Soil Cover Engineering Control**

Direct contact with soil/fill at the Site is mitigated by a soil cover system in place at the Site. This soil cover system is comprised of existing asphalt pavement, existing concrete building slabs, and grassed areas. The layout of the soil cover system is depicted in Figure 5. Additional information can be found on the Institutional and Engineering Controls Certification Form (Appendix A).

During the Site visit on March 17, 2020, those areas that could be observed (accessible portions of building slab, asphalt pavement, and landscaped areas) appeared to be functioning as intended. However, isolated portions of the landscaped areas adjacent to Albion Avenue asphalt pavement, which is outside the BCP Site boundary, had some rutting apparently due to snow removal activities. These areas were reportedly regraded by Box Capital personnel on March 20, 2020, outside of this PRR's certification period.

There was no reported removal or breach of the soil cover system during this certification period.

Additional information can be found in the Inspection Checklists and documentation included in Appendix C.



## 4. Operations and Monitoring

During this PRR certification period, the NYSDEC-approved SMP (SWRNA, August 2011, Revised November 2011; Revised February 2017 by GHD; Revised May 2019 by GHD) required semi-annual groundwater monitoring of five groundwater monitoring wells (MW-1, MW-7, MW-8, MW-10, and MW-18) and reporting to demonstrate groundwater remedy effectiveness and the overall reduction in contamination on Site. In addition, semi-annual groundwater field conditions monitoring was required for one groundwater monitoring well (MW-19) to determine groundwater elevations. These monitoring events occurred on March 8, 2019 and November 25, 2019.

The spring 2019 monitoring event, which occurred on March 8, 2019, was completed earlier than usual, causing it to fall within the previous PRR's certification period. The March 8, 2019 monitoring event also included collecting samples for laboratory analysis from all 12 Site monitoring wells to support a request to decommission several Site monitoring wells if groundwater conditions remained favorable. Results of the spring 2019 monitoring event are briefly discussed again in this PRR.

Groundwater monitoring well purge water collected during monitoring events is containerized and staged on Site. The containerized water is characterized by Syracuse Label and disposed of off Site once containers are full. During this PRR certification period, purge water from previous monitoring events, contained in two 55-gallon drums, was disposed of off Site, on two separate occasions, at the American Recyclers Company facility in Tonawanda, NY. Disposal documentation is included in Appendix D.

The groundwater monitoring events were completed in accordance with the SMP (Figure 2 and Tables 1 and 2). The laboratory sample results obtained during this PRR certification period were transmitted to the NYSDEC and NYSDOH on:

- March 22, 2019 (spring 2019 sampling)
- January 23, 2020 (fall 2019 sampling)

Groundwater sampling results for each quarterly sampling event were also uploaded into the NYSDEC EQulS Database, approved by the EQulS Team, and are ready for use (Appendix E).

### 4.1 Groundwater Monitoring Results

Based on the data, concentrations of target compounds in groundwater have shown decreases over time as a result of the remedial action and corrective measures. The most current groundwater sample analytical results (November 2020 sampling event) indicate non-detect (ND) concentrations for PCE and TCE (Table 2 and Appendix F) for all groundwater samples. The majority of the wells also have ND concentrations of degradation byproducts DCE and VC, with the exception of the most recent round of samples taken from MW-1, MW-8, MW-10 (DCE only and below groundwater standards), and MW-18, which identified concentrations of these degradation byproducts above groundwater standards, as shown in the following summary tables.



MW-1		
Target Compounds	Baseline Concentrations (February 2010)	Current Concentration (November 2019)
PCE	60 µg/L	ND
TCE	39 µg/L	ND
cis-DCE	150 µg/L	430 µg/L
trans-DCE	0.91 µg/L	ND
VC	33 µg/L	550 µg/L

MW-7		
Target Compounds	Baseline Concentrations (February 2010)	Current Concentration (November 2019)
PCE	27,000 µg/L	ND
TCE	4,300 µg/L	ND
cis-DCE	2,600 µg/L	ND
trans-DCE	ND	ND
VC	260 µg/L	ND

MW-8		
Target Compounds	Baseline Concentrations (February 2010)	Current Concentration (November 2019)
PCE	3,900 µg/L	ND
TCE	860 µg/L	ND
cis-DCE	2,500 µg/L	21 µg/L
trans-DCE	ND	ND
VC	250 µg/L	28 µg/L

MW-10		
Target Compounds	Baseline Concentrations (September 2011)	Current Concentration (November 2019)
PCE	ND	ND
TCE	ND	ND
cis-DCE	93 µg/L	1.8 µg/L
trans-DCE	ND	ND
VC	13 µg/L	ND



MW-18		
Target Compounds	Baseline Concentrations (October 2010)	Current Concentration (November 2019)
PCE	ND	ND
TCE	ND	ND
cis-DCE	ND	1,700 µg/L
trans-DCE	ND	ND
VC	2.7 µg/L	280 µg/L

Groundwater samples taken from the additional Site monitoring wells sampled in March 2019 (MW-6, MW-9, MW-11, MW-12, MW-13, MW-17, and MW-19) identified ND concentrations of PCE, TCE, cis-DCE, trans-DCE, and VC, consistent with previous analytical results.

Concentrations of cis-DCE and VC showed a sharp increase in most wells sampled following implementation of the pre-COC groundwater remedy (Table 2). The increases observed were expected as a result of the sequential degradation resulting from groundwater remediation efforts, which degraded PCE and TCE to cis-DCE and VC. The concentrations of cis-DCE and VC have generally shown a decreasing trend following implementation of the corrective measures as these compounds undergo further degradation (Table 2 and Appendix F). Laboratory analytical results of samples taken during November 2019 indicate that only samples taken from MW-1, MW-8 and MW-18 have concentrations of the degradation products cis-DCE and VC above groundwater standards. Concentrations of cis-DCE and VC in samples taken from MW-1 and MW-18 continue to identify increases since ISCR injections occurred; however, the concentrations of PCE and TCE in samples taken from these wells continue to generally be ND, with the exception of sporadic detections at relatively low concentrations in samples taken from MW-1. Trends in laboratory analytical results of samples taken from these two groundwater monitoring wells will continue to be evaluated for decreasing trends of degradation products cis-DCE and VC.

Based on the groundwater data received to date, the qualitative exposure assessment assumptions regarding on- and off-Site contamination have not changed and are still valid.

## 4.2 Monitoring Well Decommissioning

Based on the ongoing favorable groundwater sample laboratory analytical results following the March 8, 2019 monitoring event, coupled with the transfer of the property to a new owner during April 2019, Syracuse Label requested that NYSDEC allow for the decommissioning of six on-Site groundwater monitoring wells (MW-6, MW-9, MW-11, MW-12, MW-13, and MW-17). NYSDEC approved the decommissioning to be completed in accordance with NYSDEC CP-43 – Groundwater Monitoring Well Decommissioning Policy (NYSDEC, August 2009). The decommissioning occurred on March 29, 2019 and a monitoring well decommissioning report documenting these activities was prepared and submitted to NYSDEC on April 26, 2019. In addition, the SMP for the Site was revised and submitted to NYSDEC in May 2019 and subsequently approved by NYSDEC on May 20, 2019.

Currently, six groundwater monitoring wells remain at the Site, MW-1, MW-7, MW-8, and MW-10 on-Site between the building and Luther Avenue and MW-18 and MW-19 off-site across Luther Avenue.



## **5. Recommendations**

Based on a review of the groundwater data, it is recommended the current ICs and ECs for the Site remain in place to ensure the continued effectiveness and protectiveness of the remedy. Groundwater monitoring should continue semi-annually at five of the six remaining Site wells (MW-1, MW-7, MW-8, MW-10, and MW-18). The sixth remaining Site well, MW-19, should continue to be monitored for field conditions (i.e., water levels and field parameters) at the same semi-annual frequency. The effectiveness of the remedy should continue to be evaluated based on the groundwater monitoring results. The groundwater monitoring program can be reviewed and modified as appropriate in the future, with the approval of the NYSDEC and NYSDOH.

The necessary repairs to SSDS suction riser S-14 and the permanent repairs to the supports for the PVC pipe leading to Fan 1 should be arranged and completed.

Monthly Site inspections should be continued to assess the proper functioning of the SSDS and that the soil cover ECs are in place and functioning as intended. The ICs should continue to be evaluated in accordance with the revised SMP, at a minimum, at the end of the next PRR certification period in March 2021.

# Figures



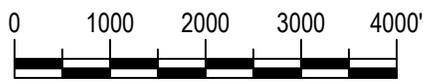
**SITE LOCATION**  
 43.087601° NORTH  
 -76.167348° WEST

Contour Interval: 10 Feet

Map Taken From: USGS 7.5 Minute Series  
 Topographic Quadrangle;  
 Syracuse West, NY (2019)  
 (U.S. Geological Survey)



QUADRANGLE LOCATION



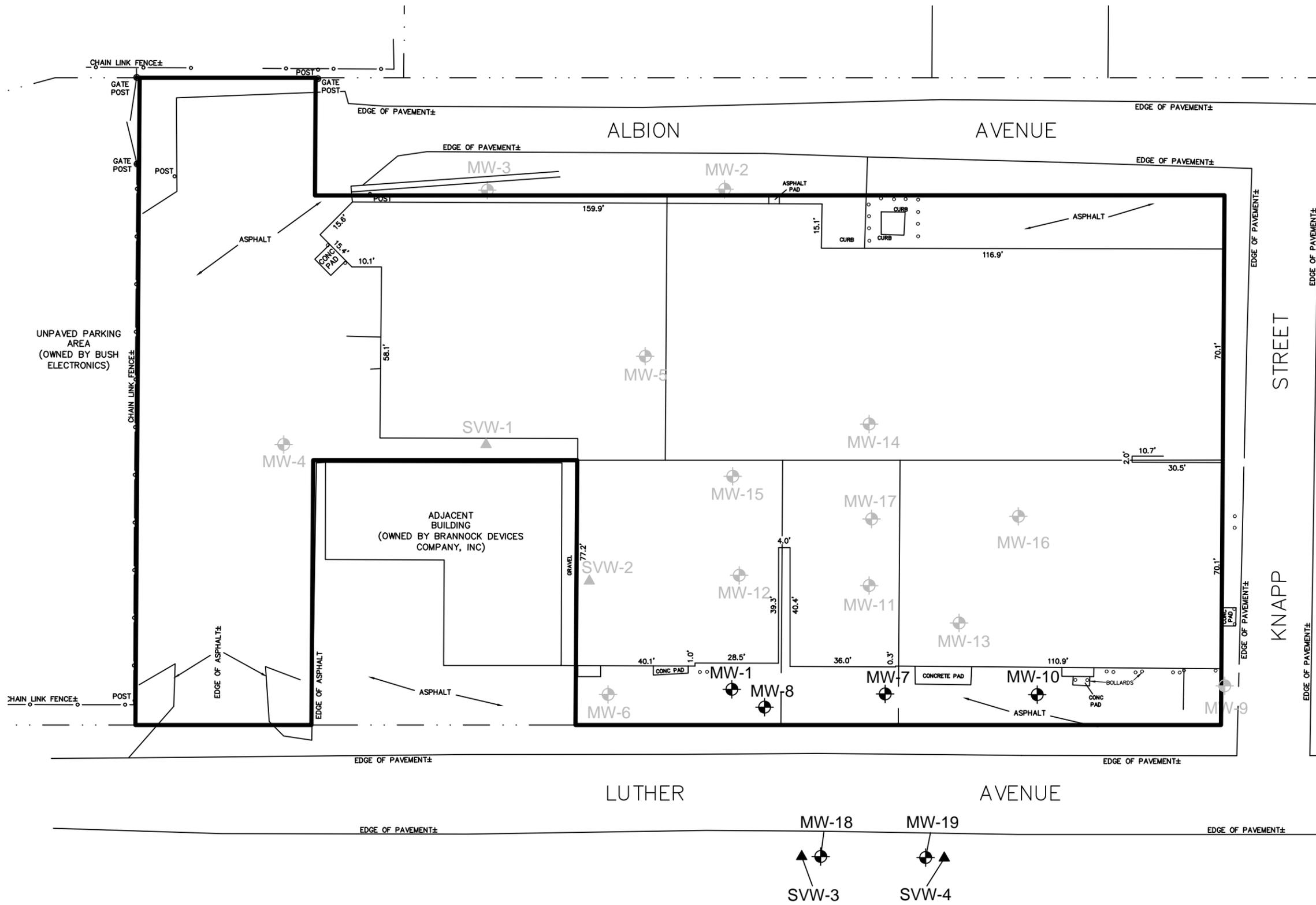
SCALE 1"=2000' AT ORIGINAL SIZE



Syracuse Label Company, Inc.  
 Periodic Review Report for BCP Site #C734118  
 March 17, 2019 to March 17, 2020  
 Site Location Map

Job Number 86-14941  
 Revision A  
 Date 03.10.2020

Figure 1



**LEGEND:**

-  **MW-1** GROUNDWATER MONITORING WELL LOCATION AND ID
-  **SVW-1** SOIL VAPOR MONITORING WELL LOCATION AND ID
-  **MW-2** GROUNDWATER MONITORING WELL LOCATION AND ID DECOMMISSIONED DECEMBER 2016 OR MARCH 2019 (SURVEYED)
-  **SVW-1** SOIL VAPOR MONITORING WELL LOCATION AND ID DECOMMISSIONED DECEMBER 2016 (SURVEYED)
-  BCP SITE BOUNDARY (APPROXIMATE)
-  PROPERTY BOUNDARY (APPROXIMATE)

**NOTES:**

1. GROUNDWATER MONITORING WELLS CURRENTLY SAMPLED SEMI-ANNUALLY FOR POINT OF COMPLIANCE MONITORING FOR CHLORINATED VOCs OF CONCERN INCLUDE MW-1, MW-7, MW-8, MW-10, AND MW-18.
2. GROUNDWATER MONITORING WELL MW-19 CURRENTLY MONITORED SEMI-ANNUALLY FOR WATER LEVELS AND FIELD PARAMETERS ONLY. NO SAMPLES ARE COLLECTED FOR LABORATORY ANALYSIS.



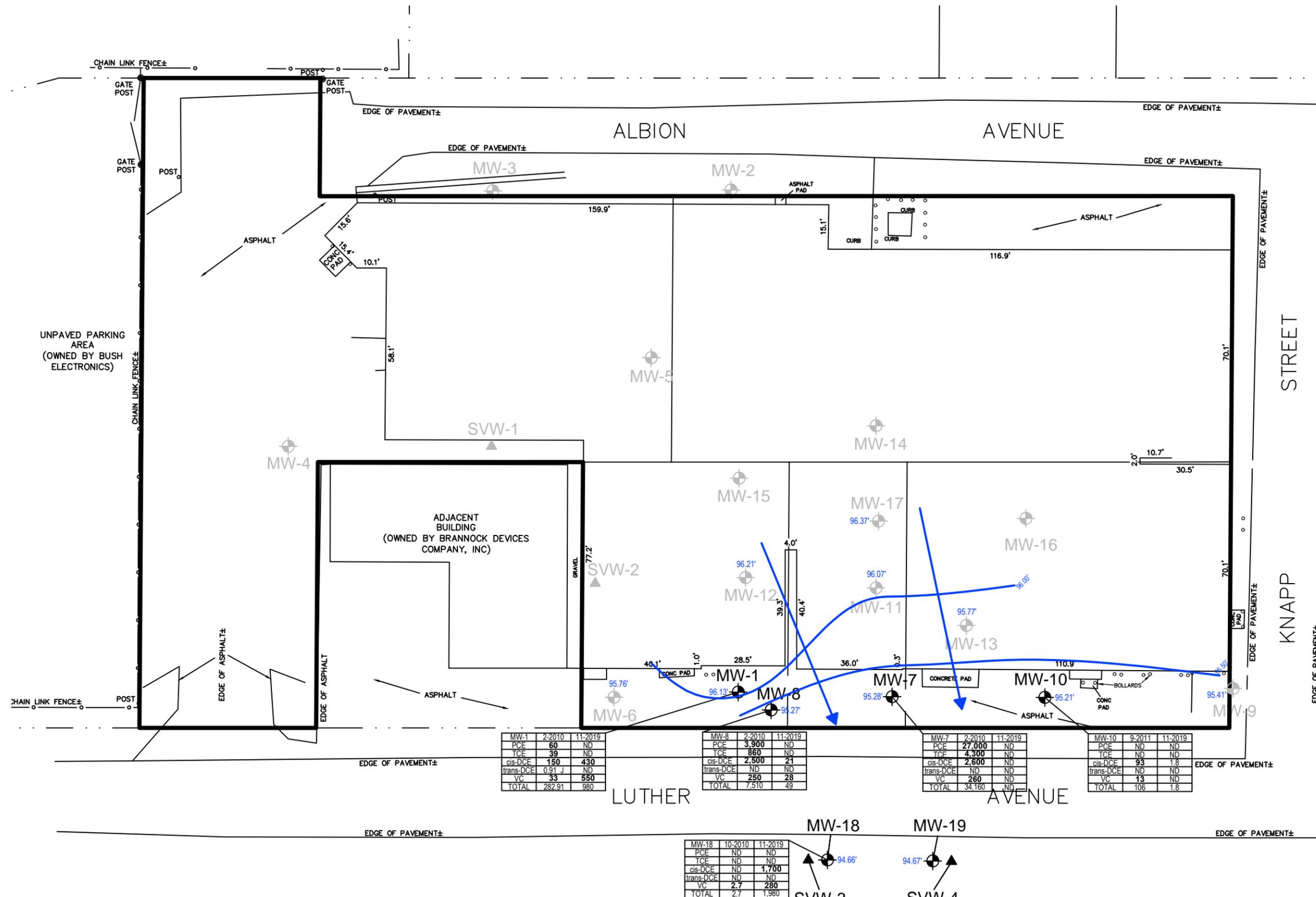
NOTES:  
1. SITE FEATURES BASED ON SITE SURVEY BY IANUZI & ROMANS, P.C. MARCH 2010 AND NOVEMBER 2010.



Syracuse Label Company, Inc.  
Periodic Review Report for BCP Site #C734118  
March 17, 2019 to March 17, 2020  
**Site Layout**

Job Number | 86-14941  
Revision | A  
Date | 03.10.2020

**Figure 2**



**LEGEND:**

- GROUNDWATER MONITORING WELL LOCATION AND ID
- SOIL VAPOR MONITORING WELL LOCATION AND ID
- GROUNDWATER MONITORING WELL LOCATION AND ID DECOMMISSIONED DECEMBER 2016 OR MARCH 2019 (SURVEYED)
- SOIL VAPOR MONITORING WELL LOCATION AND ID DECOMMISSIONED DECEMBER 2016 (SURVEYED)
- BCP SITE BOUNDARY (APPROXIMATE)
- PROPERTY BOUNDARY (APPROXIMATE)
- 95.00' GROUNDWATER ELEVATION (MARCH 2019)
- GROUNDWATER ELEVATION CONTOURS AND FLOW DIRECTION (MARCH 2019, APPROXIMATE)

WELL ID	DATE OF SAMPLING
ANALYTE	CONCENTRATION (ug/L)

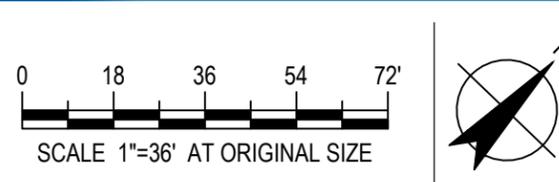
**NOTES:**

- DATA TABLES:**  
 Baseline data is from either the remedial investigation (February 2010 and October 2010) or the remedial action pilot test baseline event (February 2011).  
 Most recent data is from the fall 2019 event (November 2019).  
 PCE - Tetrachloroethene  
 TCE - Trichloroethene  
 cis-DCE - cis-1,2-Dichloroethene  
 trans-DCE - trans-1,2-Dichloroethene  
 VC - Vinyl Chloride  
 TOTAL - Total of PCE, TCE, cis-DCE, trans-DCE, and VC  
 ND - Not Detected  
 NM - Not Measured  
 Bold results indicate an exceedance of applicable groundwater standard
- REFER TO DATA TABLES IN PERIODIC REVIEW REPORT FOR COMPLETE SUMMARY OF GROUNDWATER SAMPLING RESULTS
- GROUNDWATER ELEVATIONS AND CONTOURS BASED ON MARCH 2019 MEASUREMENTS, WHICH IS THE LAST TIME ALL SITE MONITORING WELLS WERE MEASURED.
- GROUNDWATER MONITORING WELLS CURRENTLY SAMPLED SEMI-ANNUALLY FOR POINT OF COMPLIANCE MONITORING FOR CHLORINATED VOCs OF CONCERN INCLUDE MW-1, MW-7, MW-8, MW-10, AND MW-18.
- GROUNDWATER MONITORING WELL MW-19 CURRENTLY MONITORED SEMI-ANNUALLY FOR WATER LEVELS AND FIELD PARAMETERS ONLY. NO SAMPLES ARE COLLECTED FOR LABORATORY ANALYSIS.

MW-1	2-2010	11-2019	MW-6	2-2010	11-2019	MW-7	2-2010	11-2019	MW-10	9-2011	11-2019
PCE	60	ND	PCE	3,900	ND	PCE	27,000	ND	PCE	ND	ND
TCE	39	ND	TCE	860	ND	TCE	4,300	ND	TCE	ND	ND
cis-DCE	150	430	cis-DCE	2,500	21	cis-DCE	2,600	ND	cis-DCE	93	1.8
trans-DCE	0.91	ND	trans-DCE	ND	ND	trans-DCE	ND	ND	trans-DCE	ND	ND
VC	33	550	VC	250	28	VC	260	ND	VC	13	ND
<b>TOTAL</b>	282.91	980	<b>TOTAL</b>	7,510	49	<b>TOTAL</b>	34,160	ND	<b>TOTAL</b>	106	1.8

MW-18	10-2010	11-2019	MW-19	10-2010	11-2019
PCE	ND	ND	PCE	ND	ND
TCE	ND	ND	TCE	ND	ND
cis-DCE	ND	1,700	cis-DCE	ND	1,700
trans-DCE	ND	ND	trans-DCE	ND	ND
VC	2.7	280	VC	2.7	280
<b>TOTAL</b>	2.7	1,980	<b>TOTAL</b>	2.7	1,980

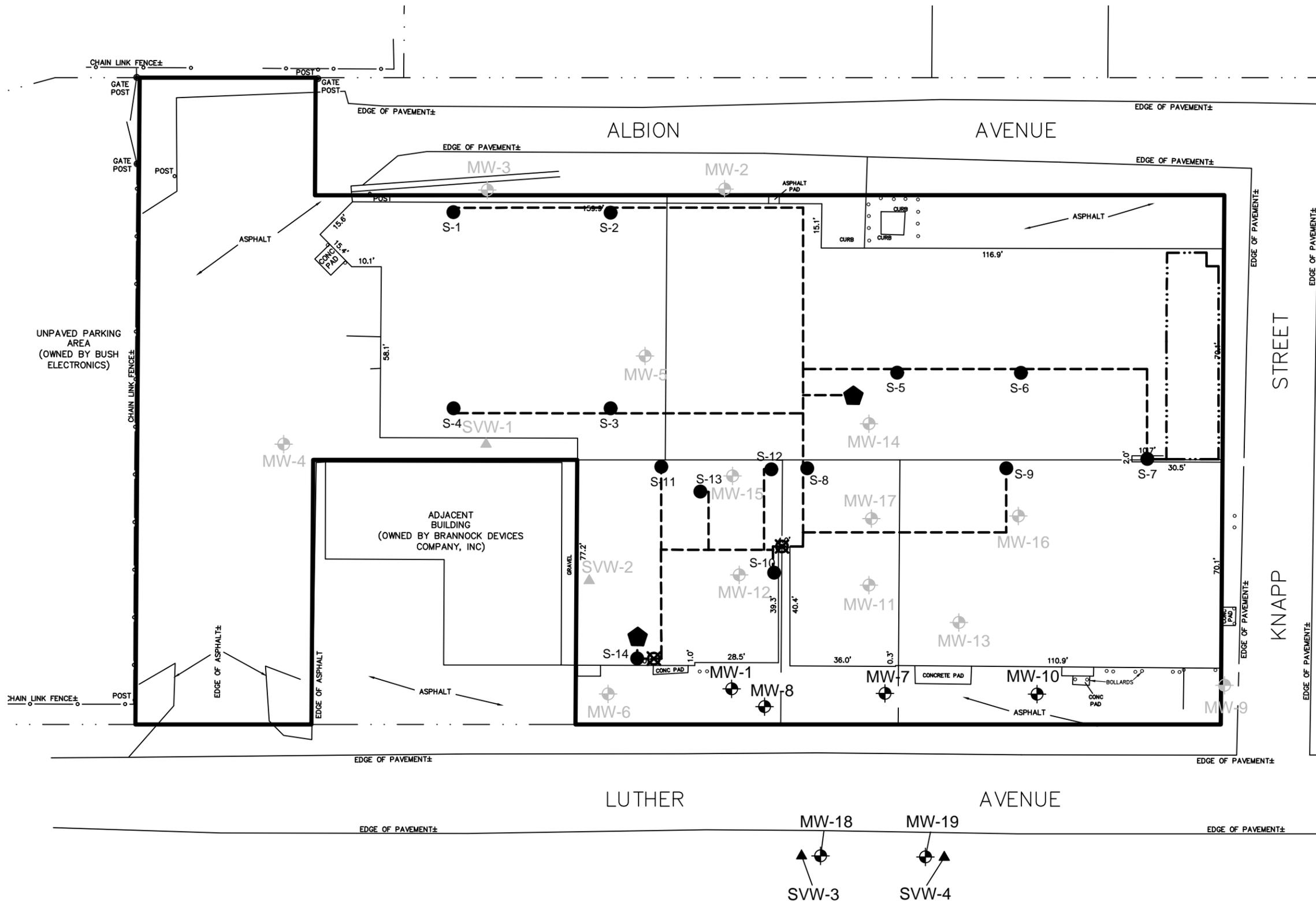


**NOTES:**  
 1. SITE FEATURES BASED ON SITE SURVEY BY IANUZI & ROMANS, P.C. MARCH 2010 AND NOVEMBER 2010.

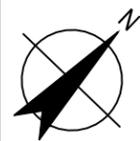


Syracuse Label Company, Inc.  
 Periodic Review Report for BCP Site #C734118  
 March 17, 2019 to March 17, 2020  
**Groundwater Monitoring Results  
 and Flow Direction**

Job Number | 86-14941  
 Revision | A  
 Date | 03.10.2020  
**Figure 3**



- LEGEND:**
- GROUNDWATER MONITORING WELL LOCATION AND ID
  - SOIL VAPOR MONITORING WELL LOCATION AND ID
  - GROUNDWATER MONITORING WELL LOCATION AND ID DECOMMISSIONED DECEMBER 2016 OR MARCH 2019 (SURVEYED)
  - SOIL VAPOR MONITORING WELL LOCATION AND ID DECOMMISSIONED DECEMBER 2016 (SURVEYED)
  - BCP SITE BOUNDARY (APPROXIMATE)
  - PROPERTY BOUNDARY (APPROXIMATE)
  - SSDS SUCTION POINT RISER LOCATION AND ID (14 LOCATIONS - APPROXIMATE)
  - SSDS FAN LOCATION (2 LOCATIONS - APPROXIMATE)
  - SSDS CONDENSATE CLEANOUT LOCATION (2 LOCATIONS - APPROXIMATE)
  - SSDS SUCTION PIPE RUN (APPROXIMATE)
  - SSDS SUB-SLAB PIPING (APPROXIMATE)
- NOTE:  
ALL SSDS LOCATIONS ARE APPROXIMATE BASED ON FIELD OBSERVATIONS AND ARE NOT SURVEYED.

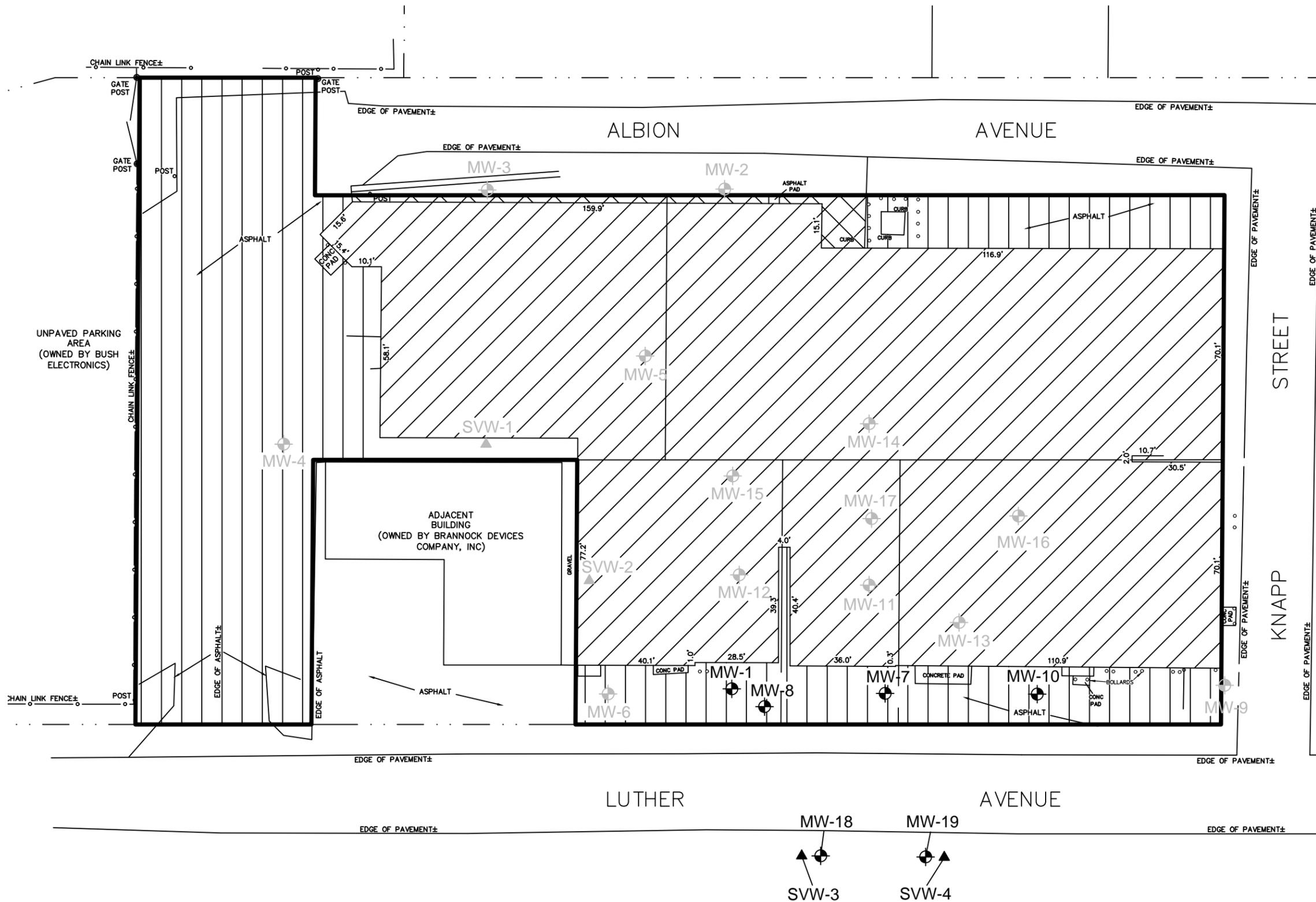


NOTES:  
1. SITE FEATURES BASED ON SITE SURVEY BY IANUZI & ROMANS, P.C. MARCH 2010 AND NOVEMBER 2010.



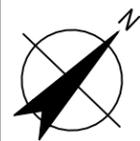
Syracuse Label Company, Inc.  
 Periodic Review Report for BCP Site #C734118  
 March 17, 2019 to March 17, 2020  
**Sub-Slab Depressurization  
 System Layout**

Job Number | 86-14941  
 Revision | A  
 Date | 03.10.2020  
**Figure 4**



**LEGEND:**

- GROUNDWATER MONITORING WELL LOCATION AND ID
- SOIL VAPOR MONITORING WELL LOCATION AND ID
- GROUNDWATER MONITORING WELL LOCATION AND ID DECOMMISSIONED DECEMBER 2016 OR MARCH 2019 (SURVEYED)
- SOIL VAPOR MONITORING WELL LOCATION AND ID DECOMMISSIONED DECEMBER 2016 (SURVEYED)
- BCP SITE BOUNDARY (APPROXIMATE)
- PROPERTY BOUNDARY (APPROXIMATE)
- EXISTING BUILDING SLAB ACTING AS ENGINEERING CONTROL
- EXISTING ASPHALT PAVEMENT ACTING AND ENGINEERING CONTROL
- EXISTING GRASS AREA ACTING AS ENGINEERING CONTROL



NOTES:  
 1. SITE FEATURES BASED ON SITE SURVEY BY IANUZI & ROMANS, P.C. MARCH 2010 AND NOVEMBER 2010.



Syracuse Label Company, Inc.  
 Periodic Review Report for BCP Site #C734118  
 March 17, 2019 to March 17, 2020  
 Soil Cover Engineering Controls

Job Number | 86-14941  
 Revision | A  
 Date | 03.10.2020

**Figure 5**

# Tables



**Table 1**  
**Groundwater Elevations**

Syracuse Label Co. Inc.  
110 Luther Avenue BCP Site  
BCP Site #C734118

Monitoring Well I.D.	Date	Reference Point	Reference Elevation (feet)	DTW (feet)	DOW (feet)	Water Elevation (feet)	Volume (gal)
MW-1	9/22/2011	Top of PVC	97.75	2.10	11.11	95.65	0.36
	3/29/2012			2.32	11.11	95.43	0.35
	12/20/2012			2.41	11.11	95.34	0.35
	3/28/2013			2.45	11.11	95.30	0.35
	12/18/2013			2.55	11.11	95.20	0.34
	6/18/2014			2.31	11.20	95.44	0.36
	6/24/2015			2.01	11.20	95.74	0.37
	9/28/2015			2.35	11.20	95.40	0.35
	7/6/2016			2.65	11.25	95.10	0.34
	9/22/2016			1.66	11.25	96.09	0.38
	5/31/2017			1.64	11.48	96.11	0.39
	11/29/2017			1.55	11.50	96.20	0.40
	5/31/2018			1.75	11.45	96.00	0.39
	12/18/2018			1.70	11.48	96.05	0.39
	3/8/2019			1.62	11.48	96.13	0.39
11/25/2019	2.66	11.30	95.09	0.35			
MW-6	12/19/2012	Top of PVC	97.49	NM	NM	NM	NM
	6/24/2015			2.11	16.25	95.38	2.26
	12/29/2015			2.08	16.25	95.41	2.27
	5/31/2018			NM	NM	NM	NM
	12/18/2018			1.54	16.25	95.95	2.35
	3/8/2019			1.73	17.40	95.76	2.51
Well Decommissioned							
MW-7	6/23/2011	Top of PVC	97.28	2.73	15.80	94.55	2.09
	8/30/2011			2.31	15.71	94.97	2.14
	9/22/2011			3.35	15.71	93.93	1.98
	3/29/2012			3.04	15.79	94.24	2.04
	6/28/2012			2.95	15.79	94.33	2.05
	9/13/2012			4.89	15.79	92.39	1.74
	12/21/2012			2.92	15.79	94.36	2.06
	3/28/2013			3.35	16.29	93.93	2.07
	6/27/2013			2.17	15.36	95.11	2.11
	9/26/2013			7.11	15.36	90.17	1.32
	12/18/2013			8.00	15.36	89.28	1.18
	3/26/2014			2.83	15.36	94.45	2.00
	6/18/2014			7.81	15.36	89.47	1.21
	9/29/2014			5.85	16.45	91.43	1.70
	12/29/2014			4.37	16.40	92.91	1.92
	3/30/2015			1.85	16.45	95.43	2.34
	6/24/2015			2.51	16.39	94.77	2.22
	9/28/2015			7.77	16.49	89.51	1.40
	12/28/2015			2.98	16.40	94.30	2.15
	3/30/2016			2.45	16.40	94.83	2.23
	7/6/2016			4.25	16.40	93.03	1.94
	9/22/2016			3.77	16.40	93.51	2.02
	12/20/2016			3.73	16.47	93.55	2.04
5/31/2017	2.12	16.72	95.16	2.34			
11/29/2017	2.69	16.68	94.59	2.24			
5/31/2018	2.09	16.69	95.19	2.34			
12/18/2018	2.26	16.65	95.02	2.30			
3/8/2019	2.00	16.69	95.28	2.35			
11/25/2019	2.42	16.59	94.86	2.27			



**Table 1**  
**Groundwater Elevations**

Monitoring Well I.D.	Date	Reference Point	Reference Elevation (feet)	DTW (feet)	DOW (feet)	Water Elevation (feet)	Volume (gal)
MW-8	6/23/2011	Top of PVC	97.38	2.50	17.05	94.88	2.33
	8/30/2011			2.50	17.05	94.88	2.33
	9/22/2011			2.46	17.05	94.92	2.33
	3/30/2012			2.51	17.06	94.87	2.33
	6/28/2012			2.76	17.06	94.62	2.29
	9/13/2012			2.90	17.06	94.48	2.27
	12/21/2012			2.41	17.06	94.97	2.34
	3/28/2013			2.37	17.26	95.01	2.38
	6/27/2013			2.42	16.55	94.96	2.26
	9/26/2013			2.95	16.55	94.43	2.18
	12/18/2013			2.95	16.55	94.43	2.18
	3/26/2014			2.86	16.55	94.52	2.19
	6/18/2014			2.61	16.55	94.77	2.23
	9/29/2014			2.86	16.50	94.52	2.18
	12/29/2014			2.59	16.27	94.79	2.19
	3/30/2015			2.35	16.51	95.03	2.27
	6/24/2015			2.78	16.50	94.60	2.20
	9/29/2015			3.42	16.49	93.96	2.09
	12/29/2015			NM	NM	NM	NM
	3/30/2016			2.14	16.70	95.24	2.33
	7/6/2016			3.62	16.75	93.76	2.10
	9/22/2016			6.04	16.75	91.34	1.71
	12/20/2016			2.25	16.81	95.13	2.33
5/31/2017	2.34	17.00	95.04	2.35			
11/29/2017	3.25	17.02	94.13	2.20			
5/31/2018	2.20	17.00	95.18	2.37			
12/18/2018	2.26	17.00	95.12	2.36			
3/8/2019	2.11	17.04	95.27	2.39			
11/25/2019	2.39	16.95	94.99	2.33			
MW-9	12/19/2012	Top of PVC	97.14	NM	NM	NM	NM
	6/24/2015			2.11	14.96	95.03	2.06
	5/31/2018			2.20	14.96	94.94	2.04
	12/18/2018			2.12	14.96	95.02	2.05
	3/8/2019			1.73	16.15	95.41	2.31
	3/29/2019			Well Decommissioned			
MW-10	9/22/2011	Top of PVC	97.34	2.60	11.82	94.74	1.48
	3/29/2012			2.64	11.82	94.70	1.47
	12/21/2012			2.63	11.82	94.71	1.47
	3/28/2013			2.49	11.82	94.85	1.49
	12/18/2013			2.62	12.95	94.72	1.65
	6/18/2014			2.42	13.11	94.92	1.71
	6/24/2015			2.28	13.25	95.06	1.76
	7/6/2016			2.85	13.55	94.49	1.71
	11/29/2017			2.44	14.00	94.90	1.85
	5/31/2018			2.28	14.00	95.06	1.88
	12/18/2018			NM	NM	NM	NM
	3/8/2019			2.13	14.21	95.21	1.93
11/25/2019	2.31	14.09	95.03	1.88			



**Table 1  
Groundwater Elevations**

Syracuse Label Co. Inc.  
110 Luther Avenue BCP Site  
BCP Site #C734118

Monitoring Well I.D.	Date	Reference Point	Reference Elevation (feet)	DTW (feet)	DOW (feet)	Water Elevation (feet)	Volume (gal)
MW-11	6/23/2011	Top of PVC	97.89	2.51	14.30	95.38	0.47
	8/29/2011			2.48	14.34	95.41	0.47
	9/22/2011			4.22	14.34	93.67	0.40
	3/29/2012			2.43	14.35	95.46	0.48
	6/28/2012			2.81	14.35	95.08	0.46
	9/13/2012			3.28	14.35	94.61	0.44
	12/19/2012			2.67	14.35	95.22	0.47
	3/28/2013			2.23	14.35	95.66	0.48
	6/27/2013			1.59	13.91	96.30	0.49
	9/26/2013			2.10	13.91	95.79	0.47
	12/18/2013			2.46	13.91	95.43	0.46
	3/26/2014			2.41	13.91	95.48	0.46
	6/18/2014			2.39	13.91	95.50	0.46
	9/29/2014			2.72	13.91	95.17	0.45
	12/29/2014			2.23	13.91	95.66	0.47
	3/30/2015			1.96	13.91	95.93	0.48
	6/24/2015			2.01	13.91	95.88	0.48
	9/28/2015			2.66	13.91	95.23	0.45
	12/28/2015			2.46	13.91	95.43	0.46
	3/30/2016			2.05	13.91	95.84	0.47
	7/6/2016			2.80	13.91	95.09	0.44
	9/22/2016			2.58	13.91	95.31	0.45
	12/19/2016			2.31	13.91	95.58	0.46
11/29/2017	2.23	13.91	95.66	0.47			
5/31/2018	2.06	13.91	95.83	0.47			
12/18/2018	2.05	15.34	95.84	0.53			
3/8/2019	1.82	15.34	96.07	0.54			
3/29/2019	Well Decommissioned						
MW-12	6/23/2011	Top of PVC	98.02	2.27	15.60	95.75	0.53
	8/29/2011			2.12	15.60	95.90	0.54
	9/22/2011			2.32	15.60	95.70	0.53
	3/29/2012			2.16	15.61	95.86	0.54
	6/28/2012			2.05	15.61	95.97	0.54
	9/13/2012			3.08	15.61	94.94	0.50
	12/19/2012			2.25	15.60	95.77	0.53
	3/28/2013			2.00	15.60	96.02	0.54
	6/27/2013			2.02	15.60	96.00	0.54
	9/26/2013			2.34	15.60	95.68	0.53
	12/18/2013			2.30	15.60	95.72	0.53
	3/26/2014			2.35	15.60	95.67	0.53
	6/18/2014			1.35	15.60	96.67	0.57
	9/29/2014			2.47	15.60	95.55	0.53
	12/29/2014			1.95	15.60	96.07	0.55
	3/30/2015			1.68	15.60	96.34	0.56
	6/24/2015			1.81	15.60	96.21	0.55
	9/28/2015			2.44	15.60	95.58	0.53
	12/28/2015			2.17	15.60	95.85	0.54
	3/30/2016			1.87	15.73	96.15	0.55
	7/6/2016			2.75	15.73	95.27	0.52
	9/22/2016			2.25	15.73	95.77	0.54
	12/19/2016			2.09	15.73	95.93	0.55
5/31/2017	1.60	16.00	96.42	0.58			
11/29/2017	2.08	15.98	95.94	0.56			
5/31/2018	1.93	15.98	96.09	0.56			
12/18/2018	1.88	16.00	96.14	0.56			
3/8/2019	1.81	16.00	96.21	0.57			
3/29/2019	Well Decommissioned						



**Table 1  
Groundwater Elevations**

Syracuse Label Co. Inc.  
110 Luther Avenue BCP Site  
BCP Site #C734118

Monitoring Well I.D.	Date	Reference Point	Reference Elevation (feet)	DTW (feet)	DOW (feet)	Water Elevation (feet)	Volume (gal)
<b>MW-13</b>	6/23/2011	Top of PVC	97.98	2.70	12.30	95.28	0.38
	8/29/2011			2.62	12.36	95.36	0.39
	9/22/2011			4.41	12.36	93.57	0.32
	3/29/2012			2.59	12.41	95.39	0.39
	6/28/2012			2.93	12.41	95.05	0.38
	9/13/2012			3.36	12.41	94.62	0.36
	12/19/2012			2.85	12.41	95.13	0.38
	3/28/2013			2.42	12.41	95.56	0.40
	6/27/2013			2.47	14.19	95.51	0.47
	9/26/2013			2.32	14.19	95.66	0.47
	12/18/2013			2.81	14.19	95.17	0.46
	3/26/2014			2.97	14.19	95.01	0.45
	6/18/2014			2.66	14.19	95.32	0.46
	9/29/2014			2.97	14.19	95.01	0.45
	12/29/2014			2.54	14.19	95.44	0.47
	3/30/2015			2.15	14.19	95.83	0.48
	6/24/2015			2.42	14.19	95.56	0.47
	9/28/2015			2.96	14.19	95.02	0.45
	12/28/2015			2.72	14.19	95.26	0.46
	3/30/2016			2.32	14.19	95.66	0.47
	7/6/2016			3.15	14.19	94.83	0.44
	9/22/2016			2.79	14.19	95.19	0.46
	12/19/2016			2.60	14.19	95.38	0.46
	5/31/2017			2.07	14.19	95.91	0.48
11/29/2017	2.56	14.10	95.42	0.46			
5/31/2018	2.40	16.04	95.58	0.55			
12/18/2018	2.43	16.10	95.55	0.55			
3/8/2019	2.21	16.10	95.77	0.56			
3/29/2019	Well Decommissioned						
<b>MW-17</b>	6/23/2011	Top of PVC	97.89	2.05	13.00	95.84	1.75
	8/29/2011			1.95	12.60	95.94	1.70
	9/22/2011			3.72	12.60	94.17	1.42
	3/29/2012			1.95	12.52	95.94	1.69
	6/28/2012			2.33	12.52	95.56	1.63
	9/13/2012			2.86	12.52	95.03	1.55
	12/19/2012			2.15	12.52	95.74	1.66
	3/28/2013			1.73	12.52	96.16	1.73
	6/27/2013			1.56	12.52	96.33	1.75
	9/26/2013			1.89	12.52	96.00	1.70
	12/18/2013			1.79	12.52	96.10	1.72
	3/26/2014			1.71	12.52	96.18	1.73
	6/18/2014			1.76	12.52	96.13	1.72
	9/29/2014			2.01	12.52	95.88	1.68
	12/29/2014			1.61	12.52	96.28	1.75
	3/30/2015			1.31	12.52	96.58	1.79
	6/24/2015			1.10	12.52	96.79	1.83
	9/28/2015			2.01	12.52	95.88	1.68
	12/28/2015			1.87	12.52	96.02	1.70
	3/30/2016			1.59	12.52	96.30	1.75
	7/6/2016			2.32	12.52	95.57	1.63
	9/22/2016			1.96	12.52	95.93	1.69
	12/19/2016			1.80	12.52	96.09	1.72
	5/31/2018			1.65	12.52	96.24	1.74
12/18/2018	1.65	12.52	96.24	1.74			
3/8/2019	1.52	13.50	96.37	1.92			
3/29/2019	Well Decommissioned						



**Table 1  
Groundwater Elevations**

Syracuse Label Co. Inc.  
110 Luther Avenue BCP Site  
BCP Site #C734118

Monitoring Well I.D.	Date	Reference Point	Reference Elevation (feet)	DTW (feet)	DOW (feet)	Water Elevation (feet)	Volume (gal)
MW-18	9/22/2011	Top of PVC	96.86	4.19	12.61	92.67	1.35
	3/29/2012			2.44	12.61	94.42	1.63
	12/20/2012			2.36	12.58	94.50	1.64
	6/19/2014			2.57	12.64	94.29	1.61
	12/29/2014			2.99	12.59	93.87	1.54
	6/24/2015			2.46	12.55	94.40	1.61
	12/30/2015			2.25	12.58	94.61	1.65
	7/7/2016			2.78	12.60	94.08	1.57
	9/22/2016			2.48	12.60	94.38	1.62
	5/31/2017			2.05	12.80	94.81	1.72
	11/29/2017			2.42	12.80	94.44	1.66
	5/31/2018			2.26	12.78	94.60	1.68
	12/18/2018			2.21	12.78	94.65	1.69
	3/8/2019			2.20	12.79	94.66	1.69
11/25/2019	2.24	12.70	94.62	1.67			
MW-19	9/22/2011	Top of PVC	97.14	4.26	13.11	92.88	1.42
	3/29/2012			2.52	13.11	94.62	1.69
	12/20/2012			2.35	13.10	94.79	1.72
	6/19/2014			2.61	13.11	94.53	1.68
	12/29/2014			2.17	13.09	94.97	1.75
	6/24/2015			2.39	13.05	94.75	1.71
	12/30/2015			2.25	13.10	94.89	1.74
	7/7/2016			3.02	13.05	94.12	1.60
	9/22/2016			2.65	13.05	94.49	1.66
	11/29/2017			2.56	13.28	94.58	1.72
	5/31/2018			2.55	13.28	94.59	1.72
	12/18/2018			2.35	13.27	94.79	1.75
	3/8/2019			2.47	13.28	94.67	1.73
	11/25/2019			2.53	13.23	94.61	1.71



**Table 2**  
**Summary of Groundwater Sample Analytical Results**

		VOCs by EPA Method 8260				
		Tetrachloroethene	Trichloroethene	cis-1,2-dichloroethene	trans-1,2-dichloroethene	Vinyl chloride
		µg/L	µg/L	µg/L	µg/L	µg/L
Regulatory Standard		5	5	5	5	2
Sample ID	Date Sampled					
MW-01	2/10/2010	<b>60</b>	<b>39</b>	<b>150</b>	0.91J	<b>33</b>
	9/11/2011	<b>72</b>	<b>34</b>	<b>110</b>	<0.76U	<b>12</b>
	3/30/2012	<b>45</b>	<b>19</b>	<b>100</b>	<1U	<b>29</b>
	12/20/2012	<b>25</b>	<b>21</b>	<b>78</b>	<1U	<b>25</b>
	6/19/2014	0.92J	1.9	<b>59</b>	<1U	<b>17</b>
	6/25/2015	<1U	0.59J	<b>130</b>	<1U	<b>42</b>
	9/29/2015	1.3J	2.4	<b>220</b>	<2U	<b>94</b>
	7/7/2016	1.1J	<b>7.2</b>	<b>2,500</b>	3.4	<b>1,100</b>
	9/23/2016	<0.36U	1.7	<b>410</b>	1.3	<b>160</b>
	5/31/2017	<3.6U	<b>6.4J</b>	<b>910</b>	<9U	<b>250</b>
	11/29/2017	<3.6U	<4.6U	<b>440</b>	<9U	<b>290</b>
	5/31/2018	<3.6U	<4.6U	<b>1,000</b>	<9U	<b>580</b>
	12/18/2018	<3.6U	<4.6U	<b>550</b>	<9U	<b>380</b>
3/8/2019	1.7J	<b>11</b>	<b>560</b>	2	<b>200</b>	
11/25/2019	<3.6U	<4.6U	<b>430</b>	<9U	<b>550</b>	
MW-06	6/25/2015	<1U	<1U	<1U	<1U	<1U
	12/29/2015	<1U	<1U	<1U	<1U	<1U
	3/8/2019	<0.72U	<0.92U	<1.6U	<1.8U	<1.8U
	3/29/2019	Well Decommissioned				

1. Regulatory Standard - Class GA Groundwater Quality Standard or Guidance Value from New York State Department of Environmental Conservation (NYSDEC) Division of Water Technical and Operational Guidance Series (June 1998).

2. U - Analyzed for but not detected above laboratory detection limit indicated

3. J - Indicates an estimated value

4. ( - ) - Not analyzed for

5. Feb-11, Mar-11, and Apr-11 data represents pilot test baseline, 1st post-pilot test sampling event, and 2nd post-pilot test sampling event, respectively

6. Jun-11, Aug-11, and Sep-11 data represents full scale ISCR injection baseline, 1st post-ISCR sampling event, and 2nd post-ISCR sampling event, respectively

7. Bold and highlighted result indicates an exceedance of applicable Regulatory Standard



**Table 2**  
**Summary of Groundwater Sample Analytical Results**

		VOCs by EPA Method 8260				
		Tetrachloroethene	Trichloroethene	cis-1,2-dichloroethene	trans-1,2-dichloroethene	Vinyl chloride
		µg/L	µg/L	µg/L	µg/L	µg/L
Regulatory Standard		5	5	5	5	2
Sample ID	Date Sampled					
MW-07	1/1/2008	<b>14,000</b>	<b>1,700</b>	<b>2,600</b>	<200U	<b>560</b>
	2/11/2010	<b>27,000</b>	<b>4,300</b>	<b>2,600</b>	<150U	<b>260J</b>
	2/11/2011	<b>17,000</b>	<b>2,600</b>	<b>2,600</b>	<150U	<b>620J</b>
	3/11/2011	<b>6,900</b>	<b>3,600</b>	<b>14,000</b>	<76U	<b>460J</b>
	4/11/2011	<b>370J</b>	<b>150J</b>	<b>17,000</b>	<150U	<b>690J</b>
	6/11/2011	<b>1,600</b>	<b>3,300</b>	<b>19,000</b>	<190U	<b>1,100J</b>
	8/11/2011	<b>240J</b>	<b>520J</b>	<b>24,000</b>	<190U	<b>8,500</b>
	9/11/2011	<b>240J</b>	<b>380</b>	<b>7,400</b>	<38U	<b>4,300</b>
	3/29/2012	<b>34</b>	<b>170J</b>	<b>11,000</b>	<b>36</b>	<b>4,300</b>
	6/28/2012	<200U	<b>140J</b>	<b>26,000</b>	<200U	<b>8,400</b>
	9/13/2012	<400U	<400U	<b>27,000</b>	<400U	<b>8,900</b>
	12/21/2012	<400U	<400U	<b>16,000</b>	<400U	<b>8,100</b>
	3/28/2013	<400U	<400U	<b>18,000</b>	<400U	<b>7,900</b>
	6/27/2013	<80U	<80U	<b>4,300</b>	<80U	<b>3,300</b>
	9/26/2013	<80U	<80U	<b>6,300</b>	<80U	<b>3,000</b>
	12/18/2013	<40U	<40U	<b>2,300</b>	<40U	<b>2,400</b>
	3/26/2014	<20U	<20U	<b>1,400</b>	<20U	<b>1,500</b>
	6/18/2014	<20U	<20U	<b>510</b>	<20U	<b>720</b>
	9/29/2014	<4U	<4U	<b>32</b>	<4U	<b>88</b>
	12/29/2014	<1.8U	<2.3U	<b>39</b>	<4.5U	<b>31</b>
	3/30/2015	<5U	<5U	<b>22</b>	<5U	<b>38</b>
	6/25/2015	<5U	<5U	<b>6.5</b>	<5U	<b>24</b>
	9/28/2015	<5U	<5U	<b>21</b>	<5U	<b>46</b>
	12/28/2015	<5U	<5U	<5U	<5U	<b>9.9</b>
	3/30/2016	<5U	<5U	<b>4.9J</b>	<5U	<b>18</b>
	7/6/2016	<0.36U	<0.46U	<b>1.6</b>	<0.9U	<b>6.3</b>
	9/22/2016	<1.4U	<1.8U	<3.2U	<3.6U	<3.6U
	12/20/2016	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U
	5/31/2017	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U
	11/29/2017	<1.4U	<1.8U	<3.2U	<3.6U	<3.6U
5/31/2018	<1.4U	<1.8U	<3.2U	<3.6U	<3.6U	
12/18/2018	<1.4U	<1.8U	<3.2U	<3.6U	<3.6U	
3/8/2019	<0.72U	<0.92U	<1.6U	<1.8U	<1.8U	
11/25/2019	<1.4U	<1.8U	<3.2U	<3.6U	<3.6U	

1. Regulatory Standard - Class GA Groundwater Quality Standard or Guidance Value from New York State Department of Environmental Conservation (NYSDEC) Division of Water Technical and Operational Guidance Series (June 1998).

2. U - Analyzed for but not detected above laboratory detection limit indicated

3. J - Indicates an estimated value

4. ( - ) - Not analyzed for

5. Feb-11, Mar-11, and Apr-11 data represents pilot test baseline, 1st post-pilot test sampling event, and 2nd post-pilot test sampling event, respectively

6. Jun-11, Aug-11, and Sep-11 data represents full scale ISCR injection baseline, 1st post-ISCR sampling event, and 2nd post-ISCR sampling event, respectively

7. Bold and highlighted result indicates an exceedance of applicable Regulatory Standard



**Table 2  
Summary of Groundwater Sample Analytical Results**

		VOCs by EPA Method 8260				
		Tetrachloroethene	Trichloroethene	cis-1,2-dichloroethene	trans-1,2-dichloroethene	Vinyl chloride
		µg/L	µg/L	µg/L	µg/L	µg/L
Regulatory Standard		5	5	5	5	2
Sample ID	Date Sampled					
MW-08	1/2/2008	<b>6,200</b>	<b>920</b>	<b>1,600</b>	<200U	<b>290</b>
	2/1/2010	<b>3,900</b>	<b>860</b>	<b>2,500</b>	<15U	<b>250</b>
	6/11/2011	<b>1,500</b>	<b>540</b>	<b>1,700</b>	<19U	<b>200</b>
	8/11/2011	<b>380J</b>	<b>140J</b>	<b>5,100</b>	<b>100J</b>	<b>4,000</b>
	9/11/2011	<b>1,100J</b>	<b>420J</b>	<b>7,900</b>	<b>83J</b>	<b>2,800</b>
	3/30/2012	<b>82</b>	<b>22</b>	<b>140</b>	1.1	<b>66</b>
	6/28/2012	<b>1,000</b>	<b>460</b>	<b>4,000</b>	<b>21</b>	<b>1,300</b>
	9/13/2012	<b>9,500</b>	<b>1,900</b>	<b>8,000</b>	<b>34</b>	<b>2,100</b>
	12/21/2012	<b>1,800</b>	<b>470</b>	<b>6,600</b>	<100U	<b>2,700</b>
	3/28/2013	<b>800</b>	<b>380</b>	<b>9,400</b>	<200U	<b>4,300</b>
	6/27/2013	<b>17J</b>	<40U	<b>2,100</b>	<40U	<b>2,000</b>
	9/26/2013	<40U	<40U	<b>160</b>	<40U	<b>67</b>
	12/18/2013	<40U	<40U	<40U	<40U	<b>110</b>
	3/26/2014	<5U	<5U	<b>330</b>	<5U	<b>380</b>
	6/18/2014	<5U	<5U	<b>110</b>	<5U	<b>67</b>
	9/29/2014	<1U	<1U	<b>0.46J</b>	<1U	<1U
	12/29/2014	<1.8U	<2.3U	<4.1U	<4.5U	<4.5U
	3/30/2015	<40U	<40U	<b>2,100</b>	<40U	<b>1,300</b>
	6/25/2015	<40U	<40U	<b>1,500</b>	<40U	<b>430</b>
	9/29/2015	<10U	<10U	<b>310</b>	<10U	<b>160</b>
	3/30/2016	<10U	<10U	<b>610</b>	<10U	<b>310</b>
	7/6/2016	<3.6U	<4.6U	<b>810</b>	<9U	<b>460</b>
	9/22/2016	<3.6U	<4.6U	<b>430</b>	<9U	<b>760</b>
12/20/2016	<0.72U	<0.92U	<b>96</b>	<1.8U	<b>63</b>	
5/31/2017	<3.6U	<4.6U	<b>490</b>	<9U	<b>310</b>	
11/29/2017	<0.36U	<0.46U	<b>1</b>	<0.9U	<0.9U	
5/31/2018	<3.6U	<4.6U	<b>620</b>	<9U	<b>740</b>	
12/18/2018	<1.4U	<1.8U	<b>120</b>	<3.6U	<b>110</b>	
3/8/2019	<0.72U	<0.92U	<b>5.5</b>	<1.8U	<b>12</b>	
11/25/2019	<0.36U	<0.46U	<b>21</b>	<0.9U	<b>28</b>	

1. Regulatory Standard - Class GA Groundwater Quality Standard or Guidance Value from New York State Department of Environmental Conservation (NYSDEC) Division of Water Technical and Operational Guidance Series (June 1998).

2. U - Analyzed for but not detected above laboratory detection limit indicated

3. J - Indicates an estimated value

4. ( - ) - Not analyzed for

5. Feb-11, Mar-11, and Apr-11 data represents pilot test baseline, 1st post-pilot test sampling event, and 2nd post-pilot test sampling event, respectively

6. Jun-11, Aug-11, and Sep-11 data represents full scale ISCR injection baseline, 1st post-ISCR sampling event, and 2nd post-ISCR sampling event, respectively

7. Bold and highlighted result indicates an exceedance of applicable Regulatory Standard



**Table 2**  
**Summary of Groundwater Sample Analytical Results**

		VOCs by EPA Method 8260				
		Tetrachloroethene	Trichloroethene	cis-1,2-dichloroethene	trans-1,2-dichloroethene	Vinyl chloride
		µg/L	µg/L	µg/L	µg/L	µg/L
Regulatory Standard		5	5	5	5	2
Sample ID	Date Sampled					
MW-09	6/25/2015	<1U	<1U	<1U	<1U	<1U
	3/8/2019	<0.72U	<0.92U	<1.6U	<1.8U	<1.8U
	3/29/2019	Well Decommissioned				
MW-10	9/11/2011	<0.81U	<0.62U	<b>93</b>	<0.76U	<b>13</b>
	3/30/2012	<1U	<1U	<b>56</b>	<1U	<b>13</b>
	12/20/2012	<1U	<1U	<b>90</b>	<1U	<b>13</b>
	6/19/2014	<5U	<5U	<5U	<5U	<5U
	6/25/2015	<5U	<5U	<5U	<5U	<5U
	7/7/2016	<0.36U	<0.46U	<0.81U	<0.9U	<b>0.98J</b>
	11/29/2017	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U
	12/18/2018	-	-	-	-	-
	3/8/2019	<0.72U	<0.92U	<1.6U	<1.8U	<1.8U
	11/25/2019	<0.36U	<0.46U	<b>1.8</b>	<0.9U	<0.9U

1. Regulatory Standard - Class GA Groundwater Quality Standard or Guidance Value from New York State Department of Environmental Conservation (NYSDEC) Division of Water Technical and Operational Guidance Series (June 1998).

2. U - Analyzed for but not detected above laboratory detection limit indicated

3. J - Indicates an estimated value

4. ( - ) - Not analyzed for

5. Feb-11, Mar-11, and Apr-11 data represents pilot test baseline, 1st post-pilot test sampling event, and 2nd post-pilot test sampling event, respectively

6. Jun-11, Aug-11, and Sep-11 data represents full scale ISCR injection baseline, 1st post-ISCR sampling event, and 2nd post-ISCR sampling event, respectively

7. Bold and highlighted result indicates an exceedance of applicable Regulatory Standard



**Table 2  
Summary of Groundwater Sample Analytical Results**

		VOCs by EPA Method 8260				
		Tetrachloroethene	Trichloroethene	cis-1,2-dichloroethene	trans-1,2-dichloroethene	Vinyl chloride
		µg/L	µg/L	µg/L	µg/L	µg/L
Regulatory Standard		5	5	5	5	2
Sample ID	Date Sampled					
MW-11	3/1/2008	<b>14,000</b>	<b>2,400</b>	-	<1,000U	<1,000U
	2/11/2010	<b>20,000</b>	<b>6,100</b>	<b>4,400</b>	<76U	<b>270J</b>
	2/11/2011	<b>42,000</b>	<b>6,300</b>	<b>3,800</b>	<380U	<500U
	3/11/2011	<b>4,200</b>	<b>1,100</b>	<b>39,000</b>	<150U	<200U
	4/11/2011	<b>2,200J</b>	<310U	<b>77,000</b>	<380U	<500U
	6/11/2011	<810U	<620U	<b>58,000</b>	<760U	<990U
	8/11/2011	<410U	<b>390J</b>	<b>49,000</b>	<380U	<b>1,100J</b>
	9/11/2011	<b>370J</b>	<b>480J</b>	<b>45,000</b>	<300U	<b>680J</b>
	3/30/2012	<b>58</b>	<b>40</b>	<b>53,000</b>	<b>16</b>	<b>2,700</b>
	6/28/2012	<40U	<40U	<b>47,000</b>	<40U	<b>3,500</b>
	9/14/2012	<800U	<800U	<b>59,000</b>	<800U	<b>4,300</b>
	12/21/2012	<800U	<800U	<b>45,000</b>	<800U	<b>4,200</b>
	3/28/2013	<800U	<800U	<b>37,000</b>	<800U	<b>4,900</b>
	6/28/2013	<100U	<100U	<b>9,600</b>	<100U	<b>560</b>
	9/27/2013	<200U	<200U	<b>20,000</b>	<200U	<b>3,200</b>
	12/19/2013	<50U	<50U	<b>3,300</b>	<50U	<b>1,800</b>
	3/27/2014	<40U	<40U	<b>2,800</b>	<40U	<b>3,200</b>
	6/19/2014	<20U	<20U	<b>500</b>	<20U	<b>930</b>
	9/30/2014	<25U	<25U	<b>110</b>	<25U	<b>250</b>
	12/30/2014	<1.4U	<1.8U	<b>68</b>	<3.6U	<b>190</b>
	3/31/2015	<4U	<4U	<b>63</b>	<4U	<b>110</b>
	6/25/2015	<4U	<4U	<4U	<4U	<b>5.6</b>
	9/29/2015	<4U	<4U	<4U	<4U	<b>5.4</b>
	12/29/2015	<4U	<4U	<4U	<4U	<4U
	3/31/2016	<4U	<4U	<4U	<4U	<4U
	7/7/2016	<1.4U	<1.8U	<3.2U	<3.6U	<3.6U
	9/23/2016	<1.4U	<1.8U	<3.2U	<3.6U	<3.6U
12/20/2016	<1.4U	<1.8U	<3.2U	<3.6U	<3.6U	
11/29/2017	<1.4U	<1.8U	<3.2U	<3.6U	<3.6U	
12/18/2018	<1.4U	<1.8U	<3.2U	<3.6U	<3.6U	
3/8/2019	<0.72U	<0.92U	<1.6U	<1.8U	<1.8U	
3/29/2019	Well Decommissioned					

1. Regulatory Standard - Class GA Groundwater Quality Standard or Guidance Value from New York State Department of Environmental Conservation (NYSDEC) Division of Water Technical and Operational Guidance Series (June 1998).

2. U - Analyzed for but not detected above laboratory detection limit indicated

3. J - Indicates an estimated value

4. ( - ) - Not analyzed for

5. Feb-11, Mar-11, and Apr-11 data represents pilot test baseline, 1st post-pilot test sampling event, and 2nd post-pilot test sampling event, respectively

6. Jun-11, Aug-11, and Sep-11 data represents full scale ISCR injection baseline, 1st post-ISCR sampling event, and 2nd post-ISCR sampling event, respectively

7. Bold and highlighted result indicates an exceedance of applicable Regulatory Standard



**Table 2**  
**Summary of Groundwater Sample Analytical Results**

		VOCs by EPA Method 8260				
		Tetrachloroethene	Trichloroethene	cis-1,2-dichloroethene	trans-1,2-dichloroethene	Vinyl chloride
		µg/L	µg/L	µg/L	µg/L	µg/L
Regulatory Standard		5	5	5	5	2
Sample ID	Date Sampled					
MW-12	3/1/2008	<b>1,200</b>	<b>280</b>	-	<20U	<20U
	2/1/2010	<b>220</b>	<b>79</b>	<b>670</b>	<3.8U	<b>18J</b>
	6/11/2011	<b>23J</b>	<12U	<b>1,000</b>	<15U	<b>45J</b>
	8/11/2011	<b>20J</b>	<b>16J</b>	<b>480</b>	<7.6U	<b>100</b>
	9/11/2011	<b>17</b>	<b>15</b>	<b>350</b>	<1.5U	<b>66</b>
	3/30/2012	<b>8.1</b>	<b>6.9</b>	<b>280</b>	<1U	<b>95</b>
	6/28/2012	<b>7.4</b>	<b>6.8</b>	<b>250</b>	<5U	<b>57</b>
	9/14/2012	<b>22</b>	<b>17</b>	<b>310</b>	<5U	<b>64</b>
	12/21/2012	<b>13</b>	<b>15</b>	<b>250</b>	<5U	<b>58</b>
	3/29/2013	<5U	<5U	<b>93</b>	<5U	<b>4.9J</b>
	6/28/2013	<b>33</b>	<b>26</b>	<b>2,400</b>	<5U	<b>63</b>
	9/27/2013	<40U	<40U	<b>1,800</b>	<40U	<b>220</b>
	12/19/2013	<10U	<10U	<b>500</b>	<10U	<b>130</b>
	3/27/2014	<5U	<5U	<b>54</b>	<5U	<b>18</b>
	6/19/2014	<5U	<5U	<b>8.9</b>	<5U	<5U
	9/30/2014	<1.7U	<1.7U	<b>2.8</b>	<1.7U	<b>1.2J</b>
	12/30/2014	<0.36U	<0.46U	<b>1.7</b>	<0.9U	<0.9U
	3/31/2015	<1U	<1U	<b>1</b>	<1U	<1U
	6/25/2015	<1U	<1U	<1U	<1U	<1U
	9/29/2015	<1U	<1U	<b>0.82J</b>	<1U	<1U
	12/29/2015	<1U	<1U	<b>0.88J</b>	<1U	<1U
	3/31/2016	<1U	<1U	<b>0.82J</b>	<1U	<1U
	7/7/2016	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U
	9/23/2016	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U
	12/20/2016	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U
	5/31/2017	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U
	11/29/2017	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U
5/31/2018	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U	
12/18/2018	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U	
3/8/2019	<0.72U	<0.92U	<1.6U	<1.8U	<1.8U	
3/29/2019	Well Decommissioned					

1. Regulatory Standard - Class GA Groundwater Quality Standard or Guidance Value from New York State Department of Environmental Conservation (NYSDEC) Division of Water Technical and Operational Guidance Series (June 1998).
2. U - Analyzed for but not detected above laboratory detection limit indicated
3. J - Indicates an estimated value
4. ( - ) - Not analyzed for
5. Feb-11, Mar-11, and Apr-11 data represents pilot test baseline, 1st post-pilot test sampling event, and 2nd post-pilot test sampling event, respectively
6. Jun-11, Aug-11, and Sep-11 data represents full scale ISCR injection baseline, 1st post-ISCR sampling event, and 2nd post-ISCR sampling event, respectively
7. Bold and highlighted result indicates an exceedance of applicable Regulatory Standard



**Table 2**  
**Summary of Groundwater Sample Analytical Results**

		VOCs by EPA Method 8260				
		Tetrachloroethene	Trichloroethene	cis-1,2-dichloroethene	trans-1,2-dichloroethene	Vinyl chloride
		µg/L	µg/L	µg/L	µg/L	µg/L
Regulatory Standard		5	5	5	5	2
Sample ID	Date Sampled					
MW-13	3/1/2008	900	470	-	<100U	<100U
	2/1/2010	410	600	780	12J	29
	6/11/2011	1,300	1,300	12,000	<150U	300J
	8/11/2011	2,500	1,800	11,000	<150U	220J
	9/11/2011	2,800	2,000	7,800	<76U	140J
	3/30/2012	1,900	1,300	8,900	14	470
	6/28/2012	2,400	1,400	9,200	<100U	290
	9/14/2012	3,300	1,900	9,700	<100U	440
	12/21/2012	5,100	2,600	8,400	<100U	480
	3/29/2013	4,600	2,500	9,600	<100U	500
	6/28/2013	4,100	2,300	11,000	<100U	220
	9/27/2013	4,000	2,100	11,000	<200U	450
	12/19/2013	2,100	1,100	16,000	<200U	370
	3/27/2014	250	160J	35,000	<200U	1,100
	6/19/2014	<800U	<800U	37,000	<800U	<800U
	9/30/2014	<830U	<830U	12,000	<830U	1,500
	12/30/2014	<180U	<230U	24,000	<450U	6,300
	3/31/2015	<200U	<200U	8,200	<200U	3,100
	6/25/2015	<200U	<200U	9,500	<200U	3,400
	9/29/2015	<200U	<200U	7,300	<200U	3,700
	12/29/2015	<200U	<200U	5,200	<200U	3,600
	3/31/2016	<200U	<200U	4,700	<200U	5,300
	7/7/2016	<18U	<23U	1,500	<45U	3,200
	9/23/2016	<18U	<23U	330	<45U	1,200
	12/20/2016	<72U	<92U	1,100	<180U	5,200
	5/31/2017	<0.72U	<0.92U	22	<1.8U	200
11/29/2017	<0.72U	<0.92U	2.6	<1.8U	23	
5/31/2018	<0.72U	<0.92U	<1.6U	<1.8U	1.9J	
12/18/2018	<0.72U	<0.92U	<1.6U	<1.8U	<1.8U	
3/8/2019	<0.72U	<0.92U	<1.6U	<1.8U	<1.8U	
3/29/2019	Well Decommissioned					

1. Regulatory Standard - Class GA Groundwater Quality Standard or Guidance Value from New York State Department of Environmental Conservation (NYSDEC) Division of Water Technical and Operational Guidance Series (June 1998).
2. U - Analyzed for but not detected above laboratory detection limit indicated
3. J - Indicates an estimated value
4. ( - ) - Not analyzed for
5. Feb-11, Mar-11, and Apr-11 data represents pilot test baseline, 1st post-pilot test sampling event, and 2nd post-pilot test sampling event, respectively
6. Jun-11, Aug-11, and Sep-11 data represents full scale ISCR injection baseline, 1st post-ISCR sampling event, and 2nd post-ISCR sampling event, respectively
7. Bold and highlighted result indicates an exceedance of applicable Regulatory Standard



**Table 2**  
**Summary of Groundwater Sample Analytical Results**

		VOCs by EPA Method 8260				
		Tetrachloroethene	Trichloroethene	cis-1,2-dichloroethene	trans-1,2-dichloroethene	Vinyl chloride
		µg/L	µg/L	µg/L	µg/L	µg/L
Regulatory Standard		5	5	5	5	2
Sample ID	Date Sampled					
MW-17	2/1/2010	<b>14,000</b>	<b>2,000</b>	<b>750</b>	<76U	<99U
	2/11/2011	<b>8,800</b>	<b>1,400</b>	<b>1,000</b>	<76U	<99U
	3/11/2011	<b>6,300</b>	<b>1,200</b>	<b>780</b>	<30U	<40U
	4/11/2011	<b>6,900</b>	<b>1,800</b>	<b>1,400</b>	<38U	<50U
	6/11/2011	<b>7,600</b>	<b>1,000</b>	<b>940</b>	<76U	<99U
	8/11/2011	<200U	<160U	<b>21,000</b>	<190U	<b>360J</b>
	9/11/2011	<81U	<62U	<b>12,000</b>	<76U	<b>1,800</b>
	3/30/2012	<b>9.7</b>	<b>6.5</b>	<b>2,700</b>	<b>6.6</b>	<b>990</b>
	6/28/2012	3.6	<b>7</b>	<b>4,300</b>	<1U	<b>1,800</b>
	9/14/2012	<50U	<50U	<b>3,500</b>	<50U	<b>1,200</b>
	12/21/2012	<50U	<50U	<b>3,800</b>	<50U	<b>2,100</b>
	3/29/2013	<10U	<10U	<b>570</b>	<10U	<b>410</b>
	6/28/2013	<10U	<10U	<b>560</b>	<10U	<b>320</b>
	9/27/2013	<10U	<10U	<b>360</b>	<10U	<b>470</b>
	12/19/2013	<10U	<10U	<b>2,400</b>	<b>14</b>	<b>1,200</b>
	3/27/2014	<10U	<10U	<10U	<10U	<b>38</b>
	6/19/2014	<1U	<1U	<b>4.4</b>	<1U	<b>32</b>
	9/30/2014	<4U	<4U	<4U	<4U	<b>37</b>
	12/30/2014	<0.36U	<0.46U	<b>1.1</b>	<0.9U	<b>20</b>
	3/31/2015	<1U	<1U	<1U	<1U	<b>16</b>
	6/25/2015	<1U	<1U	<b>1.1</b>	<1U	<b>9.5</b>
	9/29/2015	<1U	<1U	<1U	<1U	<b>14</b>
	12/29/2015	<1U	<1U	<1U	<1U	<b>1.6</b>
	3/31/2016	<1U	<1U	<1U	<1U	<1U
	7/7/2016	<0.36U	<0.46U	<0.81U	<0.9U	<b>1.1</b>
	9/23/2016	<0.36U	<0.46U	<0.81U	<0.9U	<b>1.9</b>
12/20/2016	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U	
3/8/2019	<0.72U	<0.92U	<1.6U	<1.8U	<1.8U	
3/29/2019	Well Decommissioned					

1. Regulatory Standard - Class GA Groundwater Quality Standard or Guidance Value from New York State Department of Environmental Conservation (NYSDEC) Division of Water Technical and Operational Guidance Series (June 1998).

2. U - Analyzed for but not detected above laboratory detection limit indicated

3. J - Indicates an estimated value

4. ( - ) - Not analyzed for

5. Feb-11, Mar-11, and Apr-11 data represents pilot test baseline, 1st post-pilot test sampling event, and 2nd post-pilot test sampling event, respectively

6. Jun-11, Aug-11, and Sep-11 data represents full scale ISCR injection baseline, 1st post-ISCR sampling event, and 2nd post-ISCR sampling event, respectively

7. Bold and highlighted result indicates an exceedance of applicable Regulatory Standard



**Table 2**  
**Summary of Groundwater Sample Analytical Results**

		VOCs by EPA Method 8260				
		Tetrachloroethene	Trichloroethene	cis-1,2-dichloroethene	trans-1,2-dichloroethene	Vinyl chloride
		µg/L	µg/L	µg/L	µg/L	µg/L
Regulatory Standard		5	5	5	5	2
Sample ID	Date Sampled					
MW-18	10/2/2010	<0.81U	<0.62U	<0.99U	<0.76U	<b>2.7J</b>
	9/11/2011	<0.81U	<0.62U	<b>13</b>	<0.76U	<b>17</b>
	3/30/2012	<1U	<1U	<b>29</b>	<1U	<b>9.2</b>
	12/20/2012	<1U	<1U	<b>5.5</b>	<1U	<1U
	6/19/2014	<1U	<1U	<b>230</b>	<1U	<b>30</b>
	12/29/2014	<1.8U	<2.3U	<b>75</b>	<4.5U	<b>9</b>
	6/25/2015	<5U	<5U	<b>350</b>	<5U	<b>31</b>
	12/30/2015	<5U	<5U	<b>160</b>	<5U	<b>15</b>
	7/7/2016	<1.8U	<2.3U	<b>460</b>	<4.5U	<b>58</b>
	9/22/2016	<1.8U	<2.3U	<b>65</b>	<4.5U	<4.5U
	5/31/2017	<1.8U	<2.3U	<b>610</b>	<4.5U	<b>86</b>
	11/29/2017	<1.8U	<2.3U	<b>470</b>	<4.5U	<b>92</b>
	5/31/2018	<1.8U	<2.3U	<b>670</b>	<4.5U	<b>96</b>
	12/18/2018	<1.8U	<2.3U	<b>940</b>	<4.5U	<b>140</b>
3/8/2019	<0.72U	<0.92U	<b>970</b>	<1.8U	<b>130</b>	
11/25/2019	<7.2U	<9.2U	<b>1,700</b>	<18U	<b>280</b>	
MW-19	10/2/2010	<0.81U	<0.62U	<0.99U	<0.76U	<0.99U
	9/11/2011	<0.81U	<0.62U	<0.99U	<0.76U	<0.99U
	3/30/2012	<1U	<1U	<1U	<1U	<1U
	12/20/2012	<1U	<1U	<1U	<1U	<1U
	6/19/2014	<1U	<1U	<1U	<1U	<1U
	12/29/2014	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U
	6/25/2015	<1U	<1U	<1U	<1U	<1U
	12/30/2015	<1U	<1U	<1U	<1U	<1U
	7/7/2016	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U
	9/22/2016	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U
	11/29/2017	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U
	12/18/2018	<0.72U	<0.92U	<1.6U	<1.8U	<1.8U
	3/8/2019	<0.72U	<0.92U	<1.6	<1.8U	<1.8U

1. Regulatory Standard - Class GA Groundwater Quality Standard or Guidance Value from New York State Department of Environmental Conservation (NYSDEC) Division of Water Technical and Operational Guidance Series (June 1998).
2. U - Analyzed for but not detected above laboratory detection limit indicated
3. J - Indicates an estimated value
4. ( - ) - Not analyzed for
5. Feb-11, Mar-11, and Apr-11 data represents pilot test baseline, 1st post-pilot test sampling event, and 2nd post-pilot test sampling event, respectively
6. Jun-11, Aug-11, and Sep-11 data represents full scale ISCR injection baseline, 1st post-ISCR sampling event, and 2nd post-ISCR sampling event, respectively
7. Bold and highlighted result indicates an exceedance of applicable Regulatory Standard

# Appendices

Appendix A  
Institutional and Engineering Controls  
Certification 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	
<b>Site No.</b>	<b>C734118</b>		
<b>Site Name 110 Luther Ave. Site</b>			
Site Address: 110 Luther Avenue	Zip Code: 13088		
City/Town: Liverpool			
County: Onondaga			
Site Acreage: 1.400			
Reporting Period: March 17, 2019 to March 17, 2020			
		YES	NO
1. Is the information above correct?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.</b>			
5. Is the site currently undergoing development?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
		<b>Box 2</b>	
		YES	NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial		<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Are all ICs/ECs in place and functioning as designed?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>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.</b>			
<b>A Corrective Measures Work Plan must be submitted along with this form to address these issues.</b>			
_____ Signature of Owner, Remedial Party or Designated Representative		_____ Date	

**Box 2A**

8. Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?

YES NO

**If you answered YES to question 8, include documentation or evidence that documentation has been previously submitted with this certification form.**

9. Are the assumptions in the Qualitative Exposure Assessment still valid?  
(The Qualitative Exposure Assessment must be certified every five years)

**If you answered NO to question 9, the Periodic Review Report must include an updated Qualitative Exposure Assessment based on the new assumptions.**

**SITE NO. C734118**

**Box 3**

**Description of Institutional Controls**

Parcel

**085-12-04.1**

Owner

Box Capital, LLC

Institutional Control

Monitoring Plan

IC/EC Plan

Ground Water Use Restriction

Site Management Plan

Landuse Restriction

O&M Plan

A sub-slab depressurization system (SSDS) was installed in the existing Site building in 2011. The SSDS is a high vacuum system utilizing fourteen (14) suction points positioned at location shown on Figure 9. Photographs of the system installation are included in Appendix B of this SMP. The fourteen (14) suction points are identified herein, and will be referenced in the future, as S-1, S-2, S-3, and S-4 (clockwise around warehouse starting in the southwest corner); S-5, S-6, and S-7 (south to north along office area wall); S-8 and S-9 (northeastern rooms of building), and S-10, S-11, S-12, S-13, and S-14 (southeastern rooms of building).

Each SSDS suction point consists of a 4 inch hole cored through the existing concrete slab. Each suction riser was constructed of 3 inch diameter schedule 40 polyvinyl chloride (PVC) piping. Each suction riser was connected to a single fan on the roof utilizing a trunk line network consisting of 4 inch diameter PVC piping. Each riser pipe is outfitted with a magnehelic pressure gauge, to allow for monitoring of system performance, and an interior baffle that can be adjusted to regulate airflow. All floor, wall, and roof penetrations were sealed with a VOC compliant urethane sealant. Design details are presented in the Operation and Maintenance Plan (Section 4 of this SMP).

Procedures for monitoring the system, including inspections in the event that an identified severe condition occurs, are included in the Monitoring Plan (Section 3 of this SMP). Procedures for operating and maintaining the SSDS are documented in the Operation and Maintenance Plan (Section 4 of this SMP).

A series of Institutional Controls is required by the RAWP to: (1) implement, maintain and monitor Engineering Control systems; (2) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination; and, (3) limit the use and development of the Site to Commercial or Industrial uses only. Adherence to these Institutional Controls on the Site is required by the Environmental Easement and will be implemented under this Site Management Plan. These Institutional Controls are:

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

Institutional Controls identified in the Environmental Easement may not be discontinued without an amendment to or extinguishment of the Environmental Easement.

The Site has a series of Institutional Controls in the form of Site restrictions. Adherence to these Institutional Controls is required by the Environmental Easement. Site restrictions that apply to the Controlled Property are:

- The property may only be used for Commercial or Industrial use provided that the long-term Engineering and Institutional Controls included in this SMP are employed;
- The property may not be used for a higher level of use, such as unrestricted, residential, or restricted residential use without additional remediation and amendment of the Environmental Easement, as approved by the NYSDEC;
- All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with this SMP and the Excavation Work Plan (Appendix C);
- The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use;
- The potential for vapor intrusion must be evaluated for any buildings developed onsite, and any potential impacts that are identified must be monitored or mitigated;
- Vegetable gardens and farming on the property are prohibited;
- The Site owner or remedial party will submit to NYSDEC a written statement that certifies, under

penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow and will be made by an expert that the NYSDEC finds acceptable; and

- The Site owner is required to monitor whether there is a change in ownership of the adjacent property currently owned by The Brannock Device Company, located at 116 Luther Avenue. If a change in ownership occurs the current owner will need to be notified of the environmental conditions of the 110 Luther Avenue Site and afforded the option to evaluate the potential for soil vapor intrusion into the building. Notification must also be made to the NYSDEC if the adjacent property is sold or ownership is transferred.

### 2.3.1 Excavation Work Plan

The Site has been remediated for commercial use. Any future intrusive work that will encounter or disturb the remaining contamination, including any modifications or repairs to the existing cover system will be performed in compliance with the Excavation Work Plan (EWP) that is attached as Appendix C to this SMP. Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP) prepared for the Site. A sample HASP and CAMP are attached as Appendix D to this SMP that is in current compliance with DER-10, and 29 CFR 1910, 29 CFR 1926, and all other applicable Federal, State and local regulations. Based on future changes to State and federal health and safety requirements, and specific methods employed by future contractors, the HASP and CAMP will be updated and re-submitted with the notification provided in Section C-1 of the EWP. Any intrusive construction work will be performed in compliance with the EWP, HASP and CAMP, and will be included in the periodic inspection and certification reports submitted under the Site Management Reporting Plan (See Section 5).

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

### 2.3.2 Soil Vapor Intrusion Evaluation

Prior to the construction of any enclosed structures at the Site, an SVI evaluation will be performed to determine whether any mitigation measures are necessary to eliminate potential exposure to vapors in the proposed structure. Alternatively, an SVI mitigation system may be installed as an element of the building foundation without first conducting an investigation. This mitigation system will include a vapor barrier and passive sub-slab depressurization system that is capable of being converted to an active system.

Prior to conducting an SVI investigation or installing a mitigation system, a work plan will be developed and submitted to the NYSDEC and NYSDOH for approval. This work plan will be developed in accordance with the most recent NYSDOH "Guidance for Evaluating Vapor Intrusion in the State of New York". Measures to be employed to mitigate potential vapor intrusion will be evaluated, selected, designed, installed, and maintained based on the SVI evaluation, the NYSDOH guidance, and construction details of the proposed structure.

Preliminary (unvalidated) SVI sampling data will be forwarded to the NYSDEC and NYSDOH for initial review and interpretation. Upon validation, the final data will be transmitted to the agencies, along with a recommendation for follow-up action, such as mitigation. If any indoor air test results exceed NYSDOH guidelines, relevant NYSDOH fact sheets will be provided to all tenants and occupants of the property within 15 days of receipt of validated data.

SVI sampling results, evaluations, and follow-up actions will also be summarized in the next Periodic Review Report.

**085-12-05.0**

Box Capital, LLC

Monitoring Plan

IC/EC Plan

Landuse Restriction

O&M Plan

Ground Water Use Restriction

Site Management Plan

A sub-slab depressurization system (SSDS) was installed in the existing Site building in 2011. The SSDS

is a high vacuum system utilizing fourteen (14) suction points positioned at location shown on Figure 9. Photographs of the system installation are included in Appendix B of this SMP. The fourteen (14) suction points are identified herein, and will be referenced in the future, as S-1, S-2, S-3, and S-4 (clockwise around warehouse starting in the southwest corner); S-5, S-6, and S-7 (south to north along office area wall); S-8 and S-9 (northeastern rooms of building), and S-10, S-11, S-12, S-13, and S-14 (southeastern rooms of building).

Each SSDS suction point consists of a 4 inch hole cored through the existing concrete slab. Each suction riser was constructed of 3 inch diameter schedule 40 polyvinyl chloride (PVC) piping. Each suction riser was connected to a single fan on the roof utilizing a trunk line network consisting of 4 inch diameter PVC piping. Each riser pipe is outfitted with a magnehelic pressure gauge, to allow for monitoring of system performance, and an interior baffle that can be adjusted to regulate airflow. All floor, wall, and roof penetrations were sealed with a VOC compliant urethane sealant. Design details are presented in the Operation and Maintenance Plan (Section 4 of this SMP).

Procedures for monitoring the system, including inspections in the event that an identified severe condition occurs, are included in the Monitoring Plan (Section 3 of this SMP). Procedures for operating and maintaining the SSDS are documented in the Operation and Maintenance Plan (Section 4 of this SMP).

A series of Institutional Controls is required by the RAWP to: (1) implement, maintain and monitor Engineering Control systems; (2) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination; and, (3) limit the use and development of the Site to Commercial or Industrial uses only. Adherence to these Institutional Controls on the Site is required by the Environmental Easement and will be implemented under this Site Management Plan. These Institutional Controls are:

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

Institutional Controls identified in the Environmental Easement may not be discontinued without an amendment to or extinguishment of the Environmental Easement.

The Site has a series of Institutional Controls in the form of Site restrictions. Adherence to these Institutional Controls is required by the Environmental Easement. Site restrictions that apply to the Controlled Property are:

- The property may only be used for Commercial or Industrial use provided that the long-term Engineering and Institutional Controls included in this SMP are employed;
- The property may not be used for a higher level of use, such as unrestricted, residential, or restricted residential use without additional remediation and amendment of the Environmental Easement, as approved by the NYSDEC;
- All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with this SMP and the Excavation Work Plan (Appendix C);
- The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use;
- The potential for vapor intrusion must be evaluated for any buildings developed onsite, and any potential impacts that are identified must be monitored or mitigated;
- Vegetable gardens and farming on the property are prohibited;
- The Site owner or remedial party will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow and will be made by an expert that the NYSDEC finds acceptable; and
- The Site owner is required to monitor whether there is a change in ownership of the adjacent property currently owned by The Brannock Device Company, located at 116 Luther Avenue. If a change in ownership occurs the current owner will need to be notified of the environmental conditions of the 110 Luther Avenue Site and afforded the option to evaluate the potential for soil vapor intrusion into the building.

Notification must also be made to the NYSDEC if the adjacent property is sold or ownership is transferred.

### 2.3.1 Excavation Work Plan

The Site has been remediated for commercial use. Any future intrusive work that will encounter or disturb the remaining contamination, including any modifications or repairs to the existing cover system will be performed in compliance with the Excavation Work Plan (EWP) that is attached as Appendix C to this SMP. Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP) prepared for the Site. A sample HASP and CAMP are attached as Appendix D to this SMP that is in current compliance with DER-10, and 29 CFR 1910, 29 CFR 1926, and all other applicable Federal, State and local regulations. Based on future changes to State and federal health and safety requirements, and specific methods employed by future contractors, the HASP and CAMP will be updated and re-submitted with the notification provided in Section C-1 of the EWP. Any intrusive construction work will be performed in compliance with the EWP, HASP and CAMP, and will be included in the periodic inspection and certification reports submitted under the Site Management Reporting Plan (See Section 5).

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

### 2.3.2 Soil Vapor Intrusion Evaluation

Prior to the construction of any enclosed structures at the Site, an SVI evaluation will be performed to determine whether any mitigation measures are necessary to eliminate potential exposure to vapors in the proposed structure. Alternatively, an SVI mitigation system may be installed as an element of the building foundation without first conducting an investigation. This mitigation system will include a vapor barrier and passive sub-slab depressurization system that is capable of being converted to an active system.

Prior to conducting an SVI investigation or installing a mitigation system, a work plan will be developed and submitted to the NYSDEC and NYSDOH for approval. This work plan will be developed in accordance with the most recent NYSDOH "Guidance for Evaluating Vapor Intrusion in the State of New York". Measures to be employed to mitigate potential vapor intrusion will be evaluated, selected, designed, installed, and maintained based on the SVI evaluation, the NYSDOH guidance, and construction details of the proposed structure.

Preliminary (unvalidated) SVI sampling data will be forwarded to the NYSDEC and NYSDOH for initial review and interpretation. Upon validation, the final data will be transmitted to the agencies, along with a recommendation for follow-up action, such as mitigation. If any indoor air test results exceed NYSDOH guidelines, relevant NYSDOH fact sheets will be provided to all tenants and occupants of the property within 15 days of receipt of validated data.

SVI sampling results, evaluations, and follow-up actions will also be summarized in the next Periodic Review Report.

**085-12-06.1**

Box Capital, LLC

Ground Water Use Restriction

Site Management Plan  
Monitoring Plan  
Landuse Restriction  
O&M Plan  
IC/EC Plan

A sub-slab depressurization system (SSDS) was installed in the existing Site building in 2011. The SSDS is a high vacuum system utilizing fourteen (14) suction points positioned at location shown on Figure 9. Photographs of the system installation are included in Appendix B of this SMP. The fourteen (14) suction points are identified herein, and will be referenced in the future, as S-1, S-2, S-3, and S-4 (clockwise around warehouse starting in the southwest corner); S-5, S-6, and S-7 (south to north along office area wall); S-8 and S-9 (northeastern rooms of building), and S-10, S-11, S-12, S-13, and S-14 (southeastern rooms of building).

Each SSDS suction point consists of a 4 inch hole cored through the existing concrete slab. Each suction riser was constructed of 3 inch diameter schedule 40 polyvinyl chloride (PVC) piping. Each suction riser was connected to a single fan on the roof utilizing a trunk line network consisting of 4 inch diameter PVC piping. Each riser pipe is outfitted with a magnehelic pressure gauge, to allow for monitoring of system performance, and an interior baffle that can be adjusted to regulate airflow. All floor, wall, and roof

penetrations were sealed with a VOC compliant urethane sealant. Design details are presented in the Operation and Maintenance Plan (Section 4 of this SMP).

Procedures for monitoring the system, including inspections in the event that an identified severe condition occurs, are included in the Monitoring Plan (Section 3 of this SMP). Procedures for operating and maintaining the SSDS are documented in the Operation and Maintenance Plan (Section 4 of this SMP).

A series of Institutional Controls is required by the RAWP to: (1) implement, maintain and monitor Engineering Control systems; (2) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination; and, (3) limit the use and development of the Site to Commercial or Industrial uses only. Adherence to these Institutional Controls on the Site is required by the Environmental Easement and will be implemented under this Site Management Plan. These Institutional Controls are:

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

Institutional Controls identified in the Environmental Easement may not be discontinued without an amendment to or extinguishment of the Environmental Easement.

The Site has a series of Institutional Controls in the form of Site restrictions. Adherence to these Institutional Controls is required by the Environmental Easement. Site restrictions that apply to the Controlled Property are:

- The property may only be used for Commercial or Industrial use provided that the long-term Engineering and Institutional Controls included in this SMP are employed;
- The property may not be used for a higher level of use, such as unrestricted, residential, or restricted residential use without additional remediation and amendment of the Environmental Easement, as approved by the NYSDEC;
- All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with this SMP and the Excavation Work Plan (Appendix C);
- The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use;
- The potential for vapor intrusion must be evaluated for any buildings developed onsite, and any potential impacts that are identified must be monitored or mitigated;
- Vegetable gardens and farming on the property are prohibited;
- The Site owner or remedial party will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow and will be made by an expert that the NYSDEC finds acceptable; and
- The Site owner is required to monitor whether there is a change in ownership of the adjacent property currently owned by The Brannock Device Company, located at 116 Luther Avenue. If a change in ownership occurs the current owner will need to be notified of the environmental conditions of the 110 Luther Avenue Site and afforded the option to evaluate the potential for soil vapor intrusion into the building. Notification must also be made to the NYSDEC if the adjacent property is sold or ownership is transferred.

### 2.3.1 Excavation Work Plan

The Site has been remediated for commercial use. Any future intrusive work that will encounter or disturb the remaining contamination, including any modifications or repairs to the existing cover system will be performed in compliance with the Excavation Work Plan (EWP) that is attached as Appendix C to this SMP. Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP) prepared for the Site. A sample HASP and CAMP are attached as Appendix D to this SMP that is in current compliance with DER-10, and 29 CFR 1910, 29 CFR 1926, and all other applicable Federal, State and local regulations. Based on future changes to State and federal health and safety requirements, and

specific methods employed by future contractors, the HASP and CAMP will be updated and re-submitted with the notification provided in Section C-1 of the EWP. Any intrusive construction work will be performed in compliance with the EWP, HASP and CAMP, and will be included in the periodic inspection and certification reports submitted under the Site Management Reporting Plan (See Section 5).

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

### 2.3.2 Soil Vapor Intrusion Evaluation

Prior to the construction of any enclosed structures at the Site, an SVI evaluation will be performed to determine whether any mitigation measures are necessary to eliminate potential exposure to vapors in the proposed structure. Alternatively, an SVI mitigation system may be installed as an element of the building foundation without first conducting an investigation. This mitigation system will include a vapor barrier and passive sub-slab depressurization system that is capable of being converted to an active system.

Prior to conducting an SVI investigation or installing a mitigation system, a work plan will be developed and submitted to the NYSDEC and NYSDOH for approval. This work plan will be developed in accordance with the most recent NYSDOH "Guidance for Evaluating Vapor Intrusion in the State of New York". Measures to be employed to mitigate potential vapor intrusion will be evaluated, selected, designed, installed, and maintained based on the SVI evaluation, the NYSDOH guidance, and construction details of the proposed structure.

Preliminary (unvalidated) SVI sampling data will be forwarded to the NYSDEC and NYSDOH for initial review and interpretation. Upon validation, the final data will be transmitted to the agencies, along with a recommendation for follow-up action, such as mitigation. If any indoor air test results exceed NYSDOH guidelines, relevant NYSDOH fact sheets will be provided to all tenants and occupants of the property within 15 days of receipt of validated data.

SVI sampling results, evaluations, and follow-up actions will also be summarized in the next Periodic Review Report.

**085-12-08.0**

Box Capital, LLC

IC/EC Plan

Landuse Restriction

Monitoring Plan

O&M Plan

Ground Water Use Restriction

Site Management Plan

A sub-slab depressurization system (SSDS) was installed in the existing Site building in 2011. The SSDS is a high vacuum system utilizing fourteen (14) suction points positioned at location shown on Figure 9. Photographs of the system installation are included in Appendix B of this SMP. The fourteen (14) suction points are identified herein, and will be referenced in the future, as S-1, S-2, S-3, and S-4 (clockwise around warehouse starting in the southwest corner); S-5, S-6, and S-7 (south to north along office area wall); S-8 and S-9 (northeastern rooms of building), and S-10, S-11, S-12, S-13, and S-14 (southeastern rooms of building).

Each SSDS suction point consists of a 4 inch hole cored through the existing concrete slab. Each suction riser was constructed of 3 inch diameter schedule 40 polyvinyl chloride (PVC) piping. Each suction riser was connected to a single fan on the roof utilizing a trunk line network consisting of 4 inch diameter PVC piping. Each riser pipe is outfitted with a magnehelic pressure gauge, to allow for monitoring of system performance, and an interior baffle that can be adjusted to regulate airflow. All floor, wall, and roof penetrations were sealed with a VOC compliant urethane sealant. Design details are presented in the Operation and Maintenance Plan (Section 4 of this SMP).

Procedures for monitoring the system, including inspections in the event that an identified severe condition occurs, are included in the Monitoring Plan (Section 3 of this SMP). Procedures for operating and maintaining the SSDS are documented in the Operation and Maintenance Plan (Section 4 of this SMP).

A series of Institutional Controls is required by the RAWP to: (1) implement, maintain and monitor Engineering Control systems; (2) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination; and, (3) limit the use and development of the Site to Commercial or Industrial uses only. Adherence to these Institutional Controls on the Site is required by the

Environmental Easement and will be implemented under this Site Management Plan. These Institutional Controls are:

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

Institutional Controls identified in the Environmental Easement may not be discontinued without an amendment to or extinguishment of the Environmental Easement.

The Site has a series of Institutional Controls in the form of Site restrictions. Adherence to these Institutional Controls is required by the Environmental Easement. Site restrictions that apply to the Controlled Property are:

- The property may only be used for Commercial or Industrial use provided that the long-term Engineering and Institutional Controls included in this SMP are employed;
- The property may not be used for a higher level of use, such as unrestricted, residential, or restricted residential use without additional remediation and amendment of the Environmental Easement, as approved by the NYSDEC;
- All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with this SMP and the Excavation Work Plan (Appendix C);
- The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use;
- The potential for vapor intrusion must be evaluated for any buildings developed onsite, and any potential impacts that are identified must be monitored or mitigated;
- Vegetable gardens and farming on the property are prohibited;
- The Site owner or remedial party will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow and will be made by an expert that the NYSDEC finds acceptable; and
- The Site owner is required to monitor whether there is a change in ownership of the adjacent property currently owned by The Brannock Device Company, located at 116 Luther Avenue. If a change in ownership occurs the current owner will need to be notified of the environmental conditions of the 110 Luther Avenue Site and afforded the option to evaluate the potential for soil vapor intrusion into the building. Notification must also be made to the NYSDEC if the adjacent property is sold or ownership is transferred.

### 2.3.1 Excavation Work Plan

The Site has been remediated for commercial use. Any future intrusive work that will encounter or disturb the remaining contamination, including any modifications or repairs to the existing cover system will be performed in compliance with the Excavation Work Plan (EWP) that is attached as Appendix C to this SMP. Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP) prepared for the Site. A sample HASP and CAMP are attached as Appendix D to this SMP that is in current compliance with DER-10, and 29 CFR 1910, 29 CFR 1926, and all other applicable Federal, State and local regulations. Based on future changes to State and federal health and safety requirements, and specific methods employed by future contractors, the HASP and CAMP will be updated and re-submitted with the notification provided in Section C-1 of the EWP. Any intrusive construction work will be performed in compliance with the EWP, HASP and CAMP, and will be included in the periodic inspection and certification reports submitted under the Site Management Reporting Plan (See Section 5).

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

### 2.3.2 Soil Vapor Intrusion Evaluation

Prior to the construction of any enclosed structures at the Site, an SVI evaluation will be performed to determine whether any mitigation measures are necessary to eliminate potential exposure to vapors in the proposed structure. Alternatively, an SVI mitigation system may be installed as an element of the building foundation without first conducting an investigation. This mitigation system will include a vapor barrier and passive sub-slab depressurization system that is capable of being converted to an active system.

Prior to conducting an SVI investigation or installing a mitigation system, a work plan will be developed and submitted to the NYSDEC and NYSDOH for approval. This work plan will be developed in accordance with the most recent NYSDOH "Guidance for Evaluating Vapor Intrusion in the State of New York". Measures to be employed to mitigate potential vapor intrusion will be evaluated, selected, designed, installed, and maintained based on the SVI evaluation, the NYSDOH guidance, and construction details of the proposed structure.

Preliminary (unvalidated) SVI sampling data will be forwarded to the NYSDEC and NYSDOH for initial review and interpretation. Upon validation, the final data will be transmitted to the agencies, along with a recommendation for follow-up action, such as mitigation. If any indoor air test results exceed NYSDOH guidelines, relevant NYSDOH fact sheets will be provided to all tenants and occupants of the property within 15 days of receipt of validated data.

SVI sampling results, evaluations, and follow-up actions will also be summarized in the next Periodic Review Report.

**085-12-09.0**

Box Capital, LLC

Ground Water Use Restriction  
Monitoring Plan  
Site Management Plan

Landuse Restriction  
O&M Plan  
IC/EC Plan

A sub-slab depressurization system (SSDS) was installed in the existing Site building in 2011. The SSDS is a high vacuum system utilizing fourteen (14) suction points positioned at location shown on Figure 9. Photographs of the system installation are included in Appendix B of this SMP. The fourteen (14) suction points are identified herein, and will be referenced in the future, as S-1, S-2, S-3, and S-4 (clockwise around warehouse starting in the southwest corner); S-5, S-6, and S-7 (south to north along office area wall); S-8 and S-9 (northeastern rooms of building), and S-10, S-11, S-12, S-13, and S-14 (southeastern rooms of building).

Each SSDS suction point consists of a 4 inch hole cored through the existing concrete slab. Each suction riser was constructed of 3 inch diameter schedule 40 polyvinyl chloride (PVC) piping. Each suction riser was connected to a single fan on the roof utilizing a trunk line network consisting of 4 inch diameter PVC piping. Each riser pipe is outfitted with a magnehelic pressure gauge, to allow for monitoring of system performance, and an interior baffle that can be adjusted to regulate airflow. All floor, wall, and roof penetrations were sealed with a VOC compliant urethane sealant. Design details are presented in the Operation and Maintenance Plan (Section 4 of this SMP).

Procedures for monitoring the system, including inspections in the event that an identified severe condition occurs, are included in the Monitoring Plan (Section 3 of this SMP). Procedures for operating and maintaining the SSDS are documented in the Operation and Maintenance Plan (Section 4 of this SMP).

A series of Institutional Controls is required by the RAWP to: (1) implement, maintain and monitor Engineering Control systems; (2) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination; and, (3) limit the use and development of the Site to Commercial or Industrial uses only. Adherence to these Institutional Controls on the Site is required by the Environmental Easement and will be implemented under this Site Management Plan. These Institutional Controls are:

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

Institutional Controls identified in the Environmental Easement may not be discontinued without an amendment to or extinguishment of the Environmental Easement.

The Site has a series of Institutional Controls in the form of Site restrictions. Adherence to these Institutional Controls is required by the Environmental Easement. Site restrictions that apply to the Controlled Property are:

- The property may only be used for Commercial or Industrial use provided that the long-term Engineering and Institutional Controls included in this SMP are employed;
- The property may not be used for a higher level of use, such as unrestricted, residential, or restricted residential use without additional remediation and amendment of the Environmental Easement, as approved by the NYSDEC;
- All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with this SMP and the Excavation Work Plan (Appendix C);
- The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use;
- The potential for vapor intrusion must be evaluated for any buildings developed onsite, and any potential impacts that are identified must be monitored or mitigated;
- Vegetable gardens and farming on the property are prohibited;
- The Site owner or remedial party will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow and will be made by an expert that the NYSDEC finds acceptable; and
- The Site owner is required to monitor whether there is a change in ownership of the adjacent property currently owned by The Brannock Device Company, located at 116 Luther Avenue. If a change in ownership occurs the current owner will need to be notified of the environmental conditions of the 110 Luther Avenue Site and afforded the option to evaluate the potential for soil vapor intrusion into the building. Notification must also be made to the NYSDEC if the adjacent property is sold or ownership is transferred.

#### 2.3.1 Excavation Work Plan

The Site has been remediated for commercial use. Any future intrusive work that will encounter or disturb the remaining contamination, including any modifications or repairs to the existing cover system will be performed in compliance with the Excavation Work Plan (EWP) that is attached as Appendix C to this SMP. Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP) prepared for the Site. A sample HASP and CAMP are attached as Appendix D to this SMP that is in current compliance with DER-10, and 29 CFR 1910, 29 CFR 1926, and all other applicable Federal, State and local regulations. Based on future changes to State and federal health and safety requirements, and specific methods employed by future contractors, the HASP and CAMP will be updated and re-submitted with the notification provided in Section C-1 of the EWP. Any intrusive construction work will be performed in compliance with the EWP, HASP and CAMP, and will be included in the periodic inspection and certification reports submitted under the Site Management Reporting Plan (See Section 5).

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

#### 2.3.2 Soil Vapor Intrusion Evaluation

Prior to the construction of any enclosed structures at the Site, an SVI evaluation will be performed to determine whether any mitigation measures are necessary to eliminate potential exposure to vapors in the proposed structure. Alternatively, an SVI mitigation system may be installed as an element of the building foundation without first conducting an investigation. This mitigation system will include a vapor barrier and passive sub-slab depressurization system that is capable of being converted to an active system.

Prior to conducting an SVI investigation or installing a mitigation system, a work plan will be developed and submitted to the NYSDEC and NYSDOH for approval. This work plan will be developed in accordance with the most recent NYSDOH "Guidance for Evaluating Vapor Intrusion in the State of New York". Measures to be employed to mitigate potential vapor intrusion will be evaluated, selected, designed, installed, and maintained based on the SVI evaluation, the NYSDOH guidance, and construction details of the proposed

structure.

Preliminary (unvalidated) SVI sampling data will be forwarded to the NYSDEC and NYSDOH for initial review and interpretation. Upon validation, the final data will be transmitted to the agencies, along with a recommendation for follow-up action, such as mitigation. If any indoor air test results exceed NYSDOH guidelines, relevant NYSDOH fact sheets will be provided to all tenants and occupants of the property within 15 days of receipt of validated data.

SVI sampling results, evaluations, and follow-up actions will also be summarized in the next Periodic Review Report.

**Box 4**

**Description of Engineering Controls**

<u>Parcel</u>	<u>Engineering Control</u>
<b>085-12-04.1</b>	Vapor Mitigation Cover System
<b>085-12-05.0</b>	Cover System Vapor Mitigation
<b>085-12-06.1</b>	Vapor Mitigation Cover System
<b>085-12-08.0</b>	Cover System Vapor Mitigation
<b>085-12-09.0</b>	Vapor Mitigation Cover System

### 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 complete.

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. C734118

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 Kathleen Alaimo at Syracuse Label & Surround Printing  
200 Stewart Drive, North Syracuse, New York  
13212  
print name print business address

I am certifying as Remedial Party (Owner or Remedial Party)

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

Kathleen Alaimo  
Signature of Owner, Remedial Party, or Designated Representative  
Rendering Certification

4/21/20  
Date

IC/EC CERTIFICATIONS

Box 7

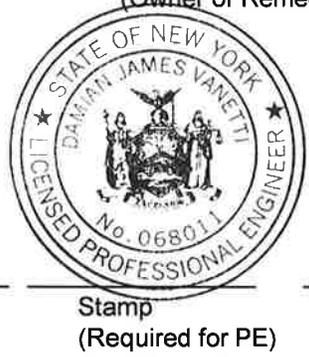
Professional Engineer Signature

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 Damian J. Vanetti at GHD Consulting Services Inc., 5788 Widewaters Pkwy, Syracuse, New York 13214  
print name print business address

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

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



4/21/2020  
Date

# Appendix B

## Property Ownership Information for Adjoining Property



# Property Description Report For: 116 Luther Ave, Municipality of Town of Salina

No Photo Available

		<b>Status:</b>	Active
		<b>Roll Section:</b>	Taxable
		<b>Swis:</b>	314889
		<b>Tax Map ID #:</b>	085.-12-10.0
		<b>Property #:</b>	
		<b>Property Class:</b>	710 - Manufacture
		<b>Site:</b>	COM 1
		<b>In Ag. District:</b>	No
		<b>Site Property Class:</b>	710 - Manufacture
		<b>Zoning Code:</b>	06
		<b>Neighborhood Code:</b>	48070
		<b>School District:</b>	Liverpool
		<b>Total Assessment:</b>	2019 - \$116,000
<b>Total Acreage/Size:</b>	90 x 90	<b>Property Desc:</b>	Buckley Gardens Lts 434 435 & 436
<b>Land Assessment:</b>	2019 - \$18,000	<b>Deed Page:</b>	42
<b>Full Market Value:</b>	2019 - \$116,000	<b>Grid North:</b>	1125115
<b>Equalization Rate:</b>	----		
<b>Deed Book:</b>	4013		
<b>Grid East:</b>	610957		

## Owners

Leonardi Salvatore A Jr  
116 Luther Ave  
Liverpool NY 13088-6726

## Sales

Sale Date	Price	Property Class	Sale Type	Prior Owner	Value Usable	Arms Length	Addl. Parcels	Deed Book and Page
7/12/1995	\$125,000	710 - Manufacture	Land & Building	Masterpol Nicholas J	Yes	Yes	No	4013/42
1/4/1995	\$75,000	710 - Manufacture	Land & Building	Krull Duane	Yes	Yes	No	3977/76

## Utilities

<b>Sewer Type:</b>	Comm/public	<b>Water Supply:</b>	Comm/public
<b>Utilities:</b>	Gas & elec		

## Inventory

<b>Overall Eff Year Built:</b>	0	<b>Overall Condition:</b>	Normal
<b>Overall Grade:</b>	Economy	<b>Overall Desirability:</b>	3

## Buildings

Eff

AC%	Sprinkler%	Alarm%	Elevators	Basement Type	Year Built	Year Built	Condition	Quality	Gross Floor Area (sqft)	Stories
67	0	0	0		1960		Normal	Average	4113	1

### Site Uses

Use	Rentable Area (sqft)	Total Units
Light mfg	4,113	0

### Improvements

Structure	Size	Grade	Condition	Year
Canpy-w/slab	24.00 sq ft	Economy	Fair	1960
Pavng-asphlt	3900 x 4	Average	Fair	1970

### Land Types

Type	Size
Primary	90 x 90

### Special Districts for 2019

Description	Units	Percent	Type	Value
FP014-Liverpool fire prot	0	0%		0
EM003-Salina ambulance	0	0%		0
CWR40-County water	0	0%		0
WT044-Salina cons wat sup	1	0%		0
SX208-Buckley 7th n sew om	1	0%		0
CDR50-Beartrap l c drg co	0	0%		0
CSW15-Onon co san un	1	0%		0
SX243-Cons Sewer 3 Galevll	1	0%		0

### Exemptions

Year	Description	Amount	Exempt %	Start Yr	End Yr	V Flag	H Code	Own %
------	-------------	--------	----------	----------	--------	--------	--------	-------

### Taxes

Year	Description	Amount
------	-------------	--------

**\* Taxes reflect exemptions, but may not include recent changes in assessment.**

Appendix C  
Sub-Slab Depressurization System Inspection  
Checklists / Annual Inspection Form /  
Representative Photographs

Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date: 3-14-19  
Inspector Name: Kevin Gagnon  
Company: SYRLSP  
Inspector Initials: KG

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	3.6
S-2	2.8
S-3	5.6
S-4	5.1
S-5	3.4
S-6	3.1
S-7	1.9
S-8	5.4
S-9	1.6
S-10	2.9
S-11	2.8
S-12	2.7
S-13	3.1
S-14	2.8

II. Fan Inspection

- 1. Operational? Y  N
- 2. Fan/Controls Clear of obstructions? Y  N
- 3. Repair needs? Y  N

Notes:

Locations of suction risers can be found on attached Figure.  
System details are included in Appendix B.

A. Observations/comments:

Attach photographs as appropriate

III. Piping/Penetrations

- 1. Is piping intact? (Y or N)  Y  N
- 2. Are floor/wall penetrations sealed? (Y or N)

If 'No' to either of the above, provide observations and describe corrective actions taken

B. Actions taken:

C. Recommended Maintenance/Repairs:

Do any of the pressure gages require repair or replacement? Y  N   
If so, indicate locations, and actions taken:

IV. Building Modifications: Have building modifications been made that could affect the operation of the SSD System? (Describe)

None at this time

Additional Comments:

Checked both condensation traps all dry

Report all maintenance/repair needs immediately to building facility manager

Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date: 4-23-19  
Inspector Name: Kevin Gagnon  
Company: SYRLSP  
Inspector Initials: KG

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	3.3
S-2	2.5
S-3	5.8
S-4	5.1
S-5	3.5
S-6	3.2
S-7	2.0
S-8	4.5
S-9	1.9
S-10	3.0
S-11	3.0
S-12	2.7
S-13	3.2
S-14	2.9

II. Fan Inspection

- 1. Operational? Y  N
- 2. Fan/Controls Clear of obstructions? Y  N
- 3. Repair needs? Y  N

A. Observations/comments:

Attach photographs as appropriate

Notes:

Locations of suction risers can be found on attached Figure.  
System details are included in Appendix B.

III. Piping/Penetrations

- 1. Is piping intact? (Y or N)
- 2. Are floor/wall penetrations sealed? (Y or N)

If 'No' to either of the above, provide observations and describe corrective actions taken

B. Actions taken:

C. Recommended Maintenance/Repairs:

Do any of the pressure gages require repair or replacement? Y  N   
If so, indicate locations, and actions taken:

IV. Building Modifications: Have building modifications been made that could affect the operation of the SSD System? (Describe)  
NONE at this time

Additional Comments:  
Condensation traps dry. KG

Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date: 5-29-19
Inspector Name: Kevin Gagnon
Company: SYRLSP
Inspector Initials: KG

I. Pressure Readings

Table with 2 columns: Suction Riser Identification, Pressure Reading (inWC). Rows S-1 to S-14 with handwritten values.

II. Fan Inspection

- 1. Operational? Y [checked] N
2. Fan/Controls Clear of obstructions? Y [checked] N
3. Repair needs? Y N [checked]

A. Observations/comments:
Attach photographs as appropriate

Notes:

Locations of suction risers can be found on attached Figure.
System details are included in Appendix B.

III. Piping/Penetrations

- 1. Is piping intact? (Y or N)
2. Are floor/wall penetrations sealed? (Y or N)

If 'No' to either of the above, provide observations and describe corrective actions taken

B. Actions taken:

C. Recommended Maintenance/Repairs:

Do any of the pressure gages require repair or replacement? Y \_\_\_ N [X]
If so, indicate locations, and actions taken:

IV. Building Modifications: Have building modifications been made that could affect the operation of the SSD System? (Describe)
None at this time.

Additional Comments:
Check condensation traps - dry. KG

Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date:

6-26-19

Inspector Name:

Kevin Gagnan

Company:

SYRLSP

Inspector Initials:

KG

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	3.4
S-2	2.9
S-3	5.8
S-4	5.0
S-5	3.6
S-6	3.2
S-7	2.1
S-8	4.5
S-9	1.9
S-10	3.2
S-11	2.9
S-12	3.0
S-13	3.2
S-14	3.0

II. Fan Inspection

- 1. Operational? Y  N
- 2. Fan/Controls Clear of obstructions? Y  N
- 3. Repair needs? Y  N

A. Observations/comments:

Attach photographs as appropriate

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

III. Piping/Penetrations

- 1. Is piping intact? (Y or N)
- 2. Are floor/wall penetrations sealed? (Y or N)

If 'No' to either of the above, provide observations and describe corrective actions taken

B. Actions taken:

C. Recommended Maintenance/Repairs:

Do any of the pressure gages require repair or replacement? If so, indicate locations, and actions taken:

Y  N

IV. Building Modifications: Have building modifications been made that could affect the operation of the SSD System? (Describe)

NONE at this time.

Additional Comments:

Condensation traps dry KG

Report all maintenance/repair needs immediately to building facility manager

Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date: 7-29-19  
Inspector Name: Kevin Gagnon  
Company: SYRLSP  
Inspector Initials: KG

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	3.4
S-2	3.9
S-3	5.6
S-4	5.0
S-5	3.4
S-6	3.2
S-7	3.0
S-8	4.5
S-9	1.7
S-10	2.8
S-11	2.6
S-12	2.5
S-13	3.7
S-14	3.9

II. Fan Inspection

1. Operational?	Y	X	N	<input checked="" type="checkbox"/>
2. Fan/Controls Clear of obstructions?	Y	X	N	<input type="checkbox"/>
3. Repair needs?	Y	<input type="checkbox"/>	N	X

A. Observations/comments:

B. Actions taken:

C. Recommended Maintenance/Repairs:

Notes:  
Locations of suction risers can be found on attached Figure.  
System details are included in Appendix B.

III. Piping/Penetrations

- 1. Is piping intact? (Y or N)
- 2. Are floor/wall penetrations sealed? (Y or N)

If 'No' to either of the above, provide observations and describe corrective actions taken

Do any of the pressure gages require repair or replacement? Y  N   
If so, indicate locations, and actions taken:

IV. Building Modifications: Have building modifications been made that could affect the operation of the SSD System? (Describe)  
None at this time. (KG)

Additional Comments:  
Condensation traps dry. (KG)

Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date:

8-29-19

Inspector Name:

Kevin Gagnan

Company:

SYRLSP

Inspector Initials:

KG

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	3.4
S-2	2.9
S-3	5.9
S-4	5.0
S-5	3.6
S-6	3.2
S-7	2.4
S-8	4.8
S-9	2.1
S-10	2.9
S-11	3.0
S-12	3.3
S-13	3.4
S-14	3.2

II. Fan Inspection

- 1. Operational? Y  N
- 2. Fan/Controls Clear of obstructions? Y  N
- 3. Repair needs? Y  N

A. Observations/comments:

Attach photographs as appropriate

Notes:

Locations of suction risers can be found on attached Figure. System details are included in Appendix B.

III. Piping/Penetrations

- 1. Is piping intact? (Y or N)
- 2. Are floor/wall penetrations sealed? (Y or N)

B. Actions taken:

If 'No' to either of the above, provide observations and describe corrective actions taken

C. Recommended Maintenance/Repairs:

Do any of the pressure gages require repair or replacement? Y  N

If so, indicate locations, and actions taken:

---



---

IV. Building Modifications: Have building modifications been made that could affect the operation of the SSD System? (Describe)

NONE at this time

Additional Comments:

Condensation traps dry. (KG)

Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date:

9/30/19

Inspector Name:

Kevin Gagnon

Company:

Syrisp

Inspector Initials:

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.1
S-2	3.3
S-3	6.1
S-4	5.3
S-5	3.6
S-6	3.4
S-7	<del>4.4</del> 2.4
S-8	4.8
S-9	2.7
S-10	2.9
S-11	2.8
S-12	2.5
S-13	3.0
S-14	2.9

II. Fan Inspection

- 1. Operational? Y  N
- 2. Fan/Controls Clear of obstructions? Y  N
- 3. Repair needs? Y  N

A. Observations/comments:

Attach photographs as appropriate

Notes:

Locations of suction risers can be found on attached Figure. System details are included in Appendix B.

III. Piping/Penetrations

- 1. Is piping intact? (Y or N)
- 2. Are floor/wall penetrations sealed? (Y or N)

If 'No' to either of the above, provide observations and describe corrective actions taken

B. Actions taken:

C. Recommended Maintenance/Repairs:

Do any of the pressure gages require repair or replacement? Y  N

If so, indicate locations, and actions taken:

\_\_\_\_\_

\_\_\_\_\_

IV. Building Modifications: Have building modifications been made that could affect the operation of the SSD System? (Describe)

None at this time

Additional Comments:

Condensation traps dry - (Kg)

Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date:

10/29/19

Inspector Name:

Kevin Gayman

Company:

SYRLSP

Inspector Initials:

KG

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.0
S-2	3.6
S-3	6.1
S-4	5.5
S-5	3.9
S-6	3.6
S-7	2.2
S-8	5.0
S-9	2.4
S-10	3.0
S-11	2.9
S-12	2.9
S-13	3.2
S-14	2.9

II. Fan Inspection

- 1. Operational? Y  N
- 2. Fan/Controls Clear of obstructions? Y  N
- 3. Repair needs? Y  N

A. Observations/comments:

Attach photographs as appropriate

Notes:

Locations of suction risers can be found on attached Figure. System details are included in Appendix B.

III. Piping/Penetrations

- 1. Is piping intact? (Y or N)
- 2. Are floor/wall penetrations sealed? (Y or N)

If 'No' to either of the above, provide observations and describe corrective actions taken

B. Actions taken:

C. Recommended Maintenance/Repairs:

Do any of the pressure gages require repair or replacement? Y  N

If so, indicate locations, and actions taken:

---



---

IV. Building Modifications: Have building modifications been made that could affect the operation of the SSD System? (Describe)

None at this time.

Additional Comments:

Condensation traps dry. (KG)

Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date:

11-26-19

Inspectors Name:

PAUL MUMFORD

Company:

SYRLESA pm

Inspector Initials:

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.0
S-2	3.0
S-3	6.0
S-4	5.0
S-5	6.0 3.5
S-6	4.0 3.5
S-7	2.5
S-8	5.0
S-9	1.5
S-10	2.5
S-11	2.5
S-12	2.5
S-13	3.0
S-14	2.5

II. Fan Inspection

- 1. Operational? Y  N
- 2. Fan/Controls Clear of obstructions? Y  N
- 3. Repair needs? Y  N

A. Observations/comments:

Attach photographs as appropriate

Notes:  
 Locations of suction risers can be found on attached Figure.  
 System details are included in Appendix B.

III. Piping/Penetrations

- 1. Is piping intact?  (Y) or N)
- 2. Are floor/wall penetrations sealed?  (Y) or N)

B. Actions taken:

If 'No' to either of the above, provide observations and describe corrective actions taken

C. Recommended Maintenance/Repairs:

Do any of the pressure gages require repair or replacement? Y  N

If so, indicate locations, and actions taken:

\_\_\_\_\_

\_\_\_\_\_

IV. Building Modifications: Have building modifications been made that could affect the operation of the SSD System? (Describe)

NONE AT THIS TIME

Additional Comments:

COMPENSATION TRAPS DRY. pm

Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date:

12/30/19

Inspectors Name:

Kim Gagon

Company:

SYRLSP

Inspector Initials:

KG

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.1
S-2	3.7
S-3	6.1
S-4	6.1
S-5	4.0
S-6	3.9
S-7	3.4
S-8	5.3
S-9	3.0
S-10	3.8
S-11	3.2
S-12	4.2
S-13	3.7
S-14	4.4

II. Fan Inspection

- 1. Operational? Y  N
- 2. Fan/Controls Clear of obstructions? Y  N
- 3. Repair needs? Y  N

A. Observations/comments:

Attach photographs as appropriate

B. Actions taken:

C. Recommended Maintenance/Repairs:

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

III. Piping/Penetrations

- 1. Is piping intact? (Y or N)
- 2. Are floor/wall penetrations sealed? (Y or N)

If 'No' to either of the above, provide observations and describe corrective actions taken

Do any of the pressure gages require repair or replacement? If so, indicate locations, and actions taken:

Y  N

IV. Building Modifications: Have building modifications been made that could affect the operation of the SSD System? (Describe)

None at this time

Additional Comments:

Condensation traps dry

(KG)

Report all maintenance/repair needs immediately to building facility manager



Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date:

2/29/2020

Inspectors Name:

Kevin Saxon

Company:

SYRLSP

Inspector Initials:

Kg

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	3.9
S-2	3.5
S-3	6.1
S-4	6.0
S-5	3.9
S-6	3.6
S-7	2.5
S-8	5.0
S-9	2.2
S-10	3.1
S-11	2.4
S-12	2.8
S-13	<del>2.8</del> 3.2
S-14	2.9

II. Fan Inspection

- 1. Operational? Y Y N
- 2. Fan/Controls Clear of obstructions? Y Y N
- 3. Repair needs? Y      N X

A. Observations/comments:

Attach photographs as appropriate

Notes:

Locations of suction risers can be found on attached Figure.  
 System details are included in Appendix B.

III. Piping/Penetrations

- 1. Is piping intact? (Y or N) Y
- 2. Are floor/wall penetrations sealed? (Y or N) Y

If 'No' to either of the above, provide observations and describe corrective actions taken

B. Actions taken:

C. Recommended Maintenance/Repairs:

Do any of the pressure gages require repair or replacement? Y      N X  
 If so, indicate locations, and actions taken:

IV. Building Modifications: Have building modifications been made that could affect the operation of the SSD System? (Describe)

None at this time

Additional Comments:

Condensation traps dry Kg

**Sub-Slab Depressurization System**

**Inspection Checklist**

**Syracuse Label, 110 Luther Avenue, Liverpool, NY**

Date: 3-17-20

Inspector Name: DJ Vanetti

Company: GHI

Inspector Initials: DJV

**I. Pressure Readings**

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.0
S-2	3.5
S-3	6.0
S-4	5.5
S-5	3.75
S-6	3.5
S-7	2.25
S-8	4.5
S-9	11.75
S-10	2.75
S-11	2.5
S-12	2.5
S-13	3.0
S-14	2.5

**II. Fan Inspection**

- 51/52
- Operational? Y Y/Y N —
  - Fan/Controls Clear of obstructions? Y Y/Y N —
  - Repair needs? Y — N N/N

A. Observations/comments:  
 Some soil cover rutted from snow removal operations  
 Clean out adjacent to S-10 no liquids  
 S-14 ball valve not sealed  
 and "T" has crack in pipe wall  
 S-1 Fan pipe supports should be repaired - no immediate impact to system function  
 The driveway at MW-19/SW-4 is getting more use and the area around the push mount concrete base is getting worse.  
 Attach photographs as appropriate

**Notes:**

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

**III. Piping/Penetrations**

- Is piping intact? (Y or N) - S-14
- Are floor/wall penetrations sealed? (Y or N)

If 'No' to either of the above, provide observations and describe corrective actions taken

Riser S-14 "T" has crack. Reported to Syracuse Label

**B. Actions taken:**

- C. Recommended Maintenance/Repairs:
- Repair cracked "T" S-14 and seal ball valve in place.
  - Repair pipe supports on S-1
  - Repair soil cover rutting and reseed

Do any of the pressure gages require repair or replacement? Y — N X

If so, indicate locations, and actions taken:

**IV. Building Modifications: Have building modifications been made that could affect the operation of the SSD System? (Describe)**

New floor covering in sections of the building (north) some doorways changed to accommodate new layout. Modifications should not impact SSDS

**Additional Comments:**

**APPENDIX H  
110 LUTHER AVENUE SITE INSPECTION FORM**

Inspections should be done at a minimum of once a year.

More frequent inspections may be required in accordance with approved work plans in specific areas undergoing construction, and following any construction-related work that may expose site soils or affect the operation of the SSDS.

Inspections must be completed if an incident or accident occurs that may require corrective measures (i.e. damage to the SSDS or emergency actions that require soil removal).

**Inspection Data**      Annually       Construction       Post-Construction

Location: *110 Luther Ave Liverpool NY*

Inspection Date: *3-17-20*

Inspected By: *DJ Vanetti*

	Y or N	Comments or Problem Identified/Action Taken
1. <b>Condition of pavement:</b> Are there areas of pavement where sub-soil is exposed?	<i>N</i>	
2. <b>Conditions of concrete slab:</b> Is the concrete slab of the manufacturing facility intact? Are there cracks or gaps through which underlying soil is exposed?	<i>Y</i> <i>N</i>	<i>New floor covering with vinyl</i>
3. <b>Sediment/Erosion Control:</b> Are erosion/storm water control devices in place in accordance with Stormwater Pollution Prevention Plan?	<i>NA</i>	<i>NA</i>
4. <b>Excavation/Backfill:</b> Has Excavation been completed in accordance with the site Excavation Work Plan?	<i>NA</i>	<i>NA</i>
5. <b>Stockpiled Materials:</b> Are temporary soil stockpiles or construction materials protected from erosion?	<i>NA</i>	<i>NA</i>
6. <b>Dust Control:</b> Have dust control measures been implemented as needed during the conduct of construction work?	<i>NA</i>	<i>NA</i>
7. <b>CAMP:</b> Has Community Air Monitoring been conducted in accordance with the CAMP?	<i>NA</i>	<i>NA</i>
8. <b>SSDS:</b> Has an inspection of the SSDS been completed?	<i>Y</i>	

If current inspection is construction or post-construction, describe the nature of the construction project:  
Has a Work Plan been prepared and approved by NYSDEC? Y\_\_\_ N\_\_\_

NA

Attach photographs as appropriate

If the current inspection is due to an incident or accident, describe the nature of the incident/accident and the corrective measures being taken.

Note: A Corrective Measure Report will need to be submitted to the NYSDEC.

NA

Attach photographs as appropriate



Photo 1 - View of minor soil cover system damage near southwestern corner of building. Reportedly repaired by Box Capital by regrading on March 20, 2020.



Photo 2 - View of minor soil cover system damage near northwestern portion of Site. Reportedly repaired by Box Capital by regrading on March 20, 2020



## Site Photographs



Photo 3 - View of northwestern portion of Site looking west.



Photo 4 - View of southwestern portion of Site looking northwest.



## Site Photographs



Photo 5 - View of eastern portion of Site along Luther Avenue looking northeast.



Photo 6 - View of northeastern portion of Site along Knapp Street looking southeast.



## Site Photographs



Photo 7 - View of Fan 1 pipe supports that need to be repaired. Temporary repairs were made by Box Capital on March 20, 2020 (outside of this PRR's certification period) until parts for permanent repair are available.



Photo 8 - View of Fan 1 pipe supports temporary repairs made by Box Capital on March 20, 2020 (outside of this PRR's certification period).





Photo 9 - View of broken "T" fitting and dislodged ball valve on SSDS suction riser S-14 leading to Fan 2. Repairs will be arranged outside of this PRR's certification period.



Photo 10 - The dislodged ball valve was able to be temporarily re-inserted until repairs can be arranged outside of this PRR's certification period.





Photo 11 - View of use of room and condition of concrete floor slab engineering control in vicinity of damaged SSDS suction riser S-14.



Photo 12 - View of use of room and condition on concrete floor slab engineering control in vicinity of former MW-13 and former MW-16.



## Site Photographs

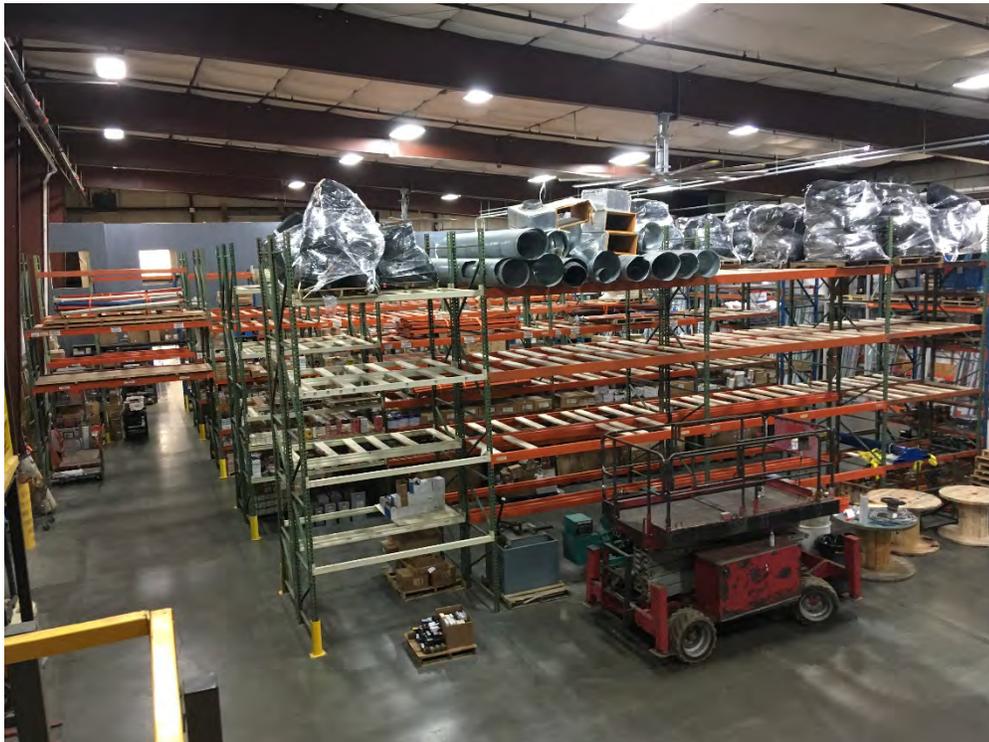


Photo 13 - View of use of warehouse portion of Site building.



Photo 14 - View of remodeled former office space portion of building and current use as lighting showroom.



## Site Photographs



Photo 15 - View of interior concrete floor slab engineering control in vicinity of former MW-11.



Photo 16 - View of typical SSDS suction point riser and magnehelic gauge.



# Appendix D

## Groundwater Sampling Waste Disposal Documentation



177 Wales Ave., Tonawanda, NY, 14150  
NYR 000 030 809

## CERTIFICATE OF DISPOSAL for:

Syracuse Label  
110 Luther Ave., Liverpool, NY 13088  
EPA ID # NYD042350751

MANIFEST NUMBER: 29647

<u>TYPE</u>	<u>QUANTITY</u>	<u>APPROVAL NUMBER</u>
Well Water	1 Drum	B-6623IN

*THIS IS TO CERTIFY THAT THE ABOVE DESCRIBED WASTE HAS BEEN DISPOSED OF IN ACCORDANCE TO FEDERAL, STATE, AND LOCAL LAWS.*

SIGNED: \_\_\_\_\_

Julian Mastropoll  
Facility Manager

DATE: 1/22/19



177 Wales Ave., Tonawanda, NY, 14150  
NYR 000 030 809

## CERTIFICATE OF DISPOSAL for:

Syracuse Label  
110 Luther Ave., Liverpool, NY 13088  
EPA ID # NYD042350751

MANIFEST NUMBER: 30098

<u>TYPE</u>	<u>QUANTITY</u>	<u>APPROVAL NUMBER</u>
Well Water	1 Drum	B-6623IN

*THIS IS TO CERTIFY THAT THE ABOVE DESCRIBED WASTE HAS BEEN DISPOSED OF IN ACCORDANCE TO FEDERAL, STATE, AND LOCAL LAWS.*

SIGNED: \_\_\_\_\_

Julian Mastropoll  
Facility Manager

DATE: 3/19/19

# Appendix E

## Approval Notifications for EQUIS Database Submittals

## Ian McNamara

---

**From:** dec.sm.NYENVDATA <NYENVDATA@dec.ny.gov>  
**Sent:** Thursday, April 18, 2019 12:38 PM  
**To:** Dyson Sprouse  
**Cc:** Mannes, Christopher (DEC); Ian McNamara  
**Subject:** RE: EDDs for the 110 Luther Avenue BCP Site #C734118 - 2nd Qtr 2019 GW Monitoring

**Attachments:** 20190322 1433.C734118.NYSDEC\_MERGE\_201904181122\_Summary.html;  
Chemistry 20190322 1433.C734118.NYSDEC\_MERGE.zip

**OperatingCentre:** 86  
**JobNo:** 14941  
**CompleteRepository:** 8614941  
**RepoEmail:** 8614941@ghd.com  
**Description:** Syracuse Label Monitoring 2012  
**RepoType:** Job

Dyson,

The dataset containing laboratory analytical results includes errors identified by the format published in January (see attached error log generated from 20190322 1433.C734118.NYSDEC\_MERGE). Please do not submit data containing errors identified by the published format without comment, as it is not technically possible for us to load such data to the NYSDEC database without revision.

That said, in the particular case of EDDs like 20190322 1433.C734118.NYSDEC\_MERGE, I have (for now) the authority to make the necessary revisions to the data in order to load it to the database. When data providers choose the wrong sample\_source flag for their Trip Blank, Matrix Spike, or Matrix Spike Duplicate samples, the EIMS Team has granted me permission to prepare and load revised copies of such datasets (revised copy attached). The revised data was successfully uploaded to the NYSDEC EQuIS database, and is available for use within the system.

We also successfully uploaded the 1437 EDD without any need for further revisions.

Aaron  
NYSDEC EIMS Team



---

**From:** Dyson.Sprouse@ghd.com <Dyson.Sprouse@ghd.com>  
**Sent:** Friday, March 22, 2019 2:52 PM  
**To:** dec.sm.NYENVDATA <NYENVDATA@dec.ny.gov>  
**Cc:** Mannes, Christopher (DEC) <christopher.mannes@dec.ny.gov>; Ian McNamara <Ian.McNamara@ghd.com>  
**Subject:** EDDs for the 110 Luther Avenue BCP Site #C734118 - 2nd Qtr 2019 GW Monitoring

**ATTENTION:** This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Hello,

Attached are 2 EDDs related to 2<sup>nd</sup> quarter 2019 groundwater monitoring that was conducted at the above referenced site in March 2019. One contains field results and groundwater elevations from the wells and the other contains laboratory analytical results from the wells. Please let me know if these need any edits to be acceptable.

## Ian McNamara

---

**From:** dec.sm.NYENVDATA <NYENVDATA@dec.ny.gov>  
**Sent:** Friday, March 6, 2020 3:52 PM  
**To:** Ian McNamara  
**Cc:** Mannes, Christopher (DEC); Morrison, Douglas (DEC)  
**Subject:** RE: EDDs for the 110 Luther Avenue BCP Site #C734118 - 4th Qtr 2019 GW Monitoring

**OperatingCentre:** 86  
**JobNo:** 14941  
**CompleteRepository:** 8614941  
**RepoEmail:** 8614941@ghd.com  
**Description:** Syracuse Label Monitoring 2012  
**RepoType:** Job

Ian,

Thank you for your EDD submission. NYSDEC has successfully uploaded the data from the EDDs "20191217 1641.C734118.NYSDEC\_MERGE" and "20191217 1646.C734118.NYSDEC\_MERGE" to 110 Luther Ave. Site in the NYSDEC database and the data is available for use within the system.

Aaron  
NYSDEC EIMS Team



---

**From:** Ian McNamara <Ian.McNamara@ghd.com>  
**Sent:** Tuesday, December 17, 2019 4:49 PM  
**To:** dec.sm.NYENVDATA <NYENVDATA@dec.ny.gov>  
**Cc:** Mannes, Christopher (DEC) <christopher.mannes@dec.ny.gov>  
**Subject:** EDDs for the 110 Luther Avenue BCP Site #C734118 - 4th Qtr 2019 GW Monitoring

*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

Hello,

Attached are 2 EDDs related to 4<sup>th</sup> quarter 2019 groundwater monitoring that was conducted at the above referenced site in November 2019. One contains field results and groundwater elevations from the wells and the other contains laboratory analytical results from the wells. Please let me know if these need any edits to be acceptable.

Thank you,  
Ian

**Ian McNamara**  
Scientist  
Environment

**GHD**

*Proudly employee owned*

T: +315 679 5732 | M: +315 368 8432 | E: [ian.mcnamara@ghd.com](mailto:ian.mcnamara@ghd.com)  
One Remington Park Drive Cazenovia NY 13035 USA | [www.ghd.com](http://www.ghd.com)

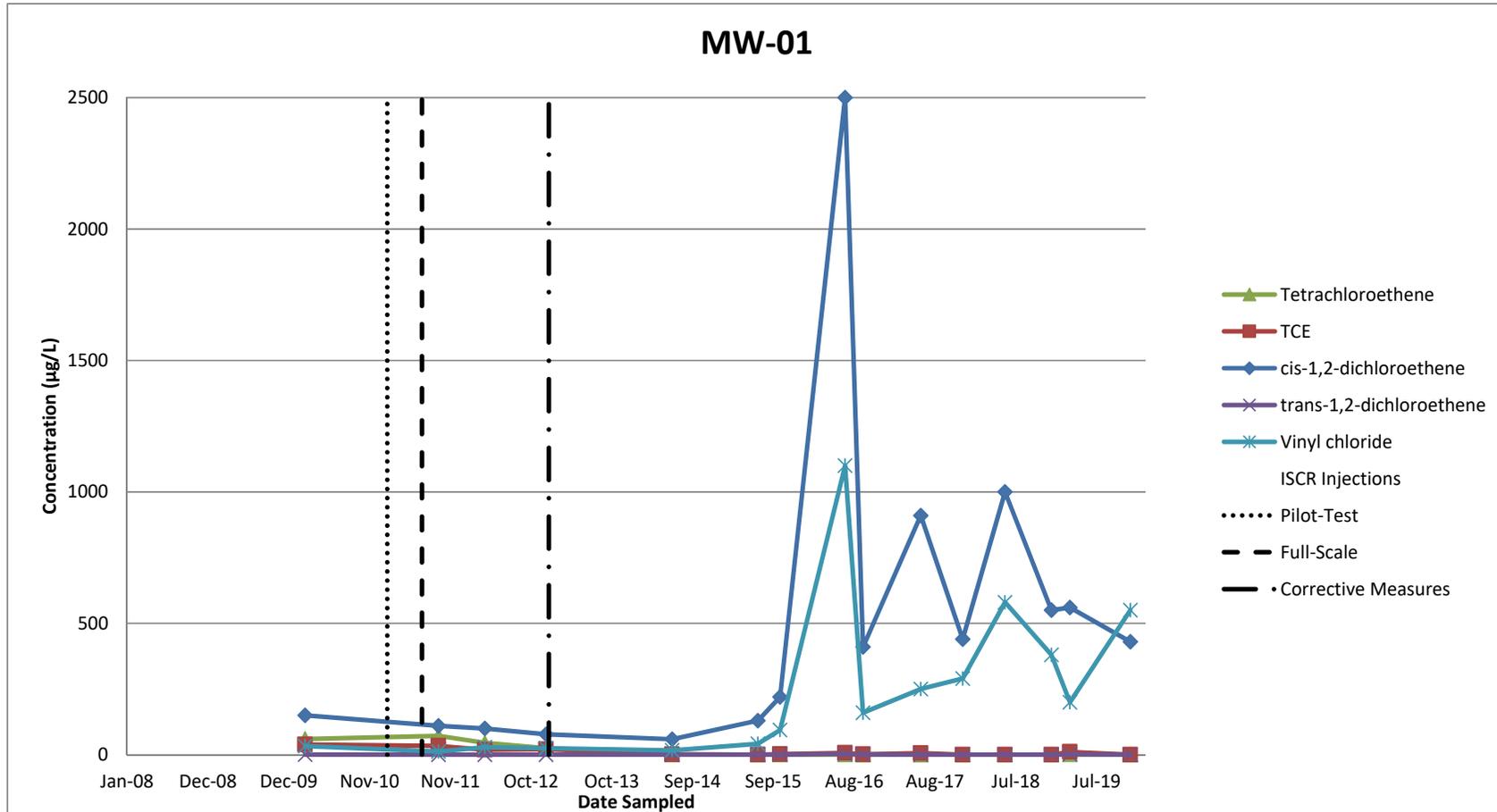
# Appendix F

## Time Series Plots



Appendix F  
Time Series Plots  
Chlorinated VOCs of Concern

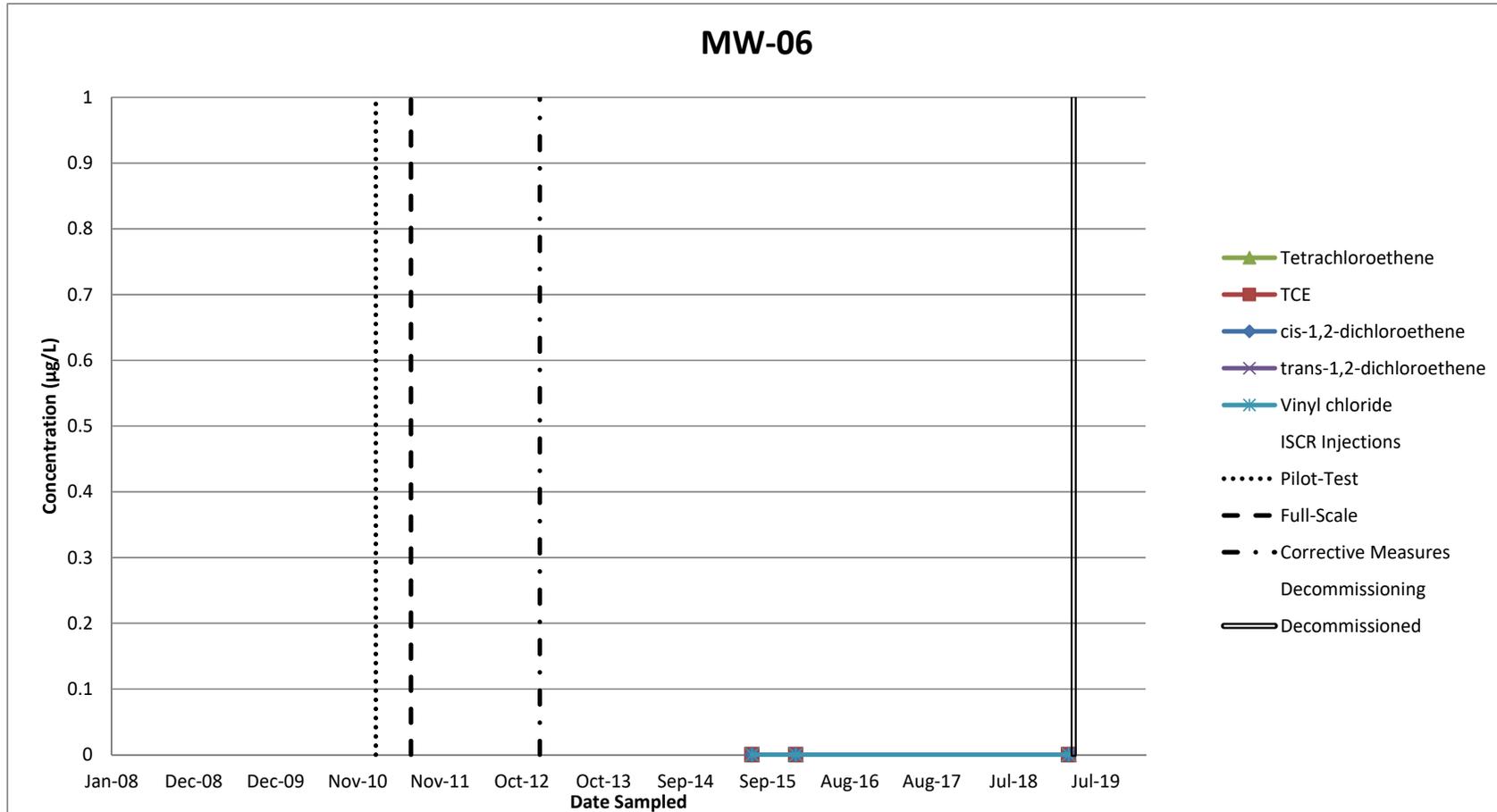
Syracuse Label Company, Inc.  
110 Luther Avenue BCP Site  
Site #C734118





**Appendix F**  
**Time Series Plots**  
**Chlorinated VOCs of Concern**

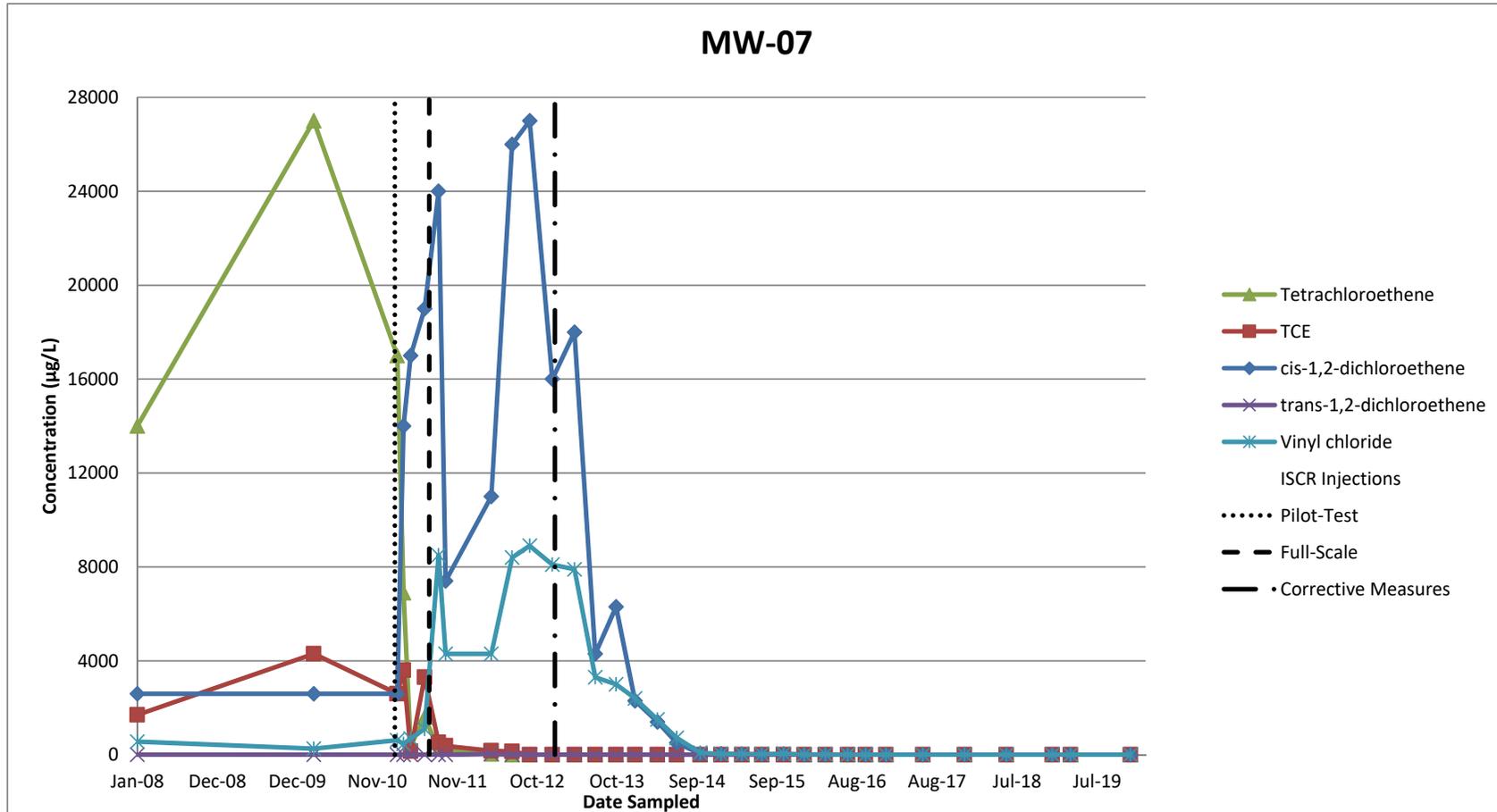
Syracuse Label Company, Inc.  
110 Luther Avenue BCP Site  
Site #C734118





Appendix F  
Time Series Plots  
Chlorinated VOCs of Concern

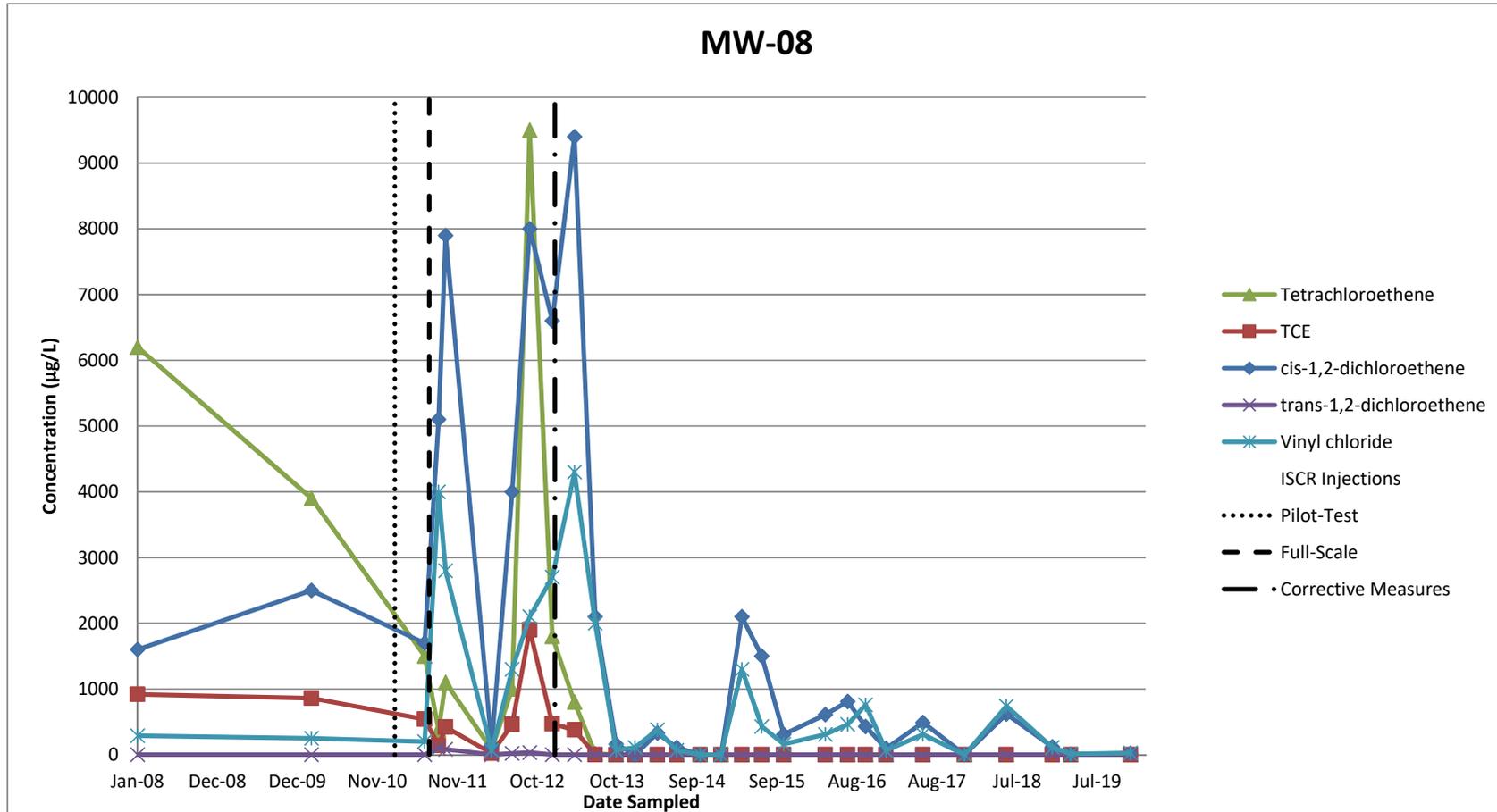
Syracuse Label Company, Inc.  
110 Luther Avenue BCP Site  
Site #C734118





**Appendix F**  
**Time Series Plots**  
**Chlorinated VOCs of Concern**

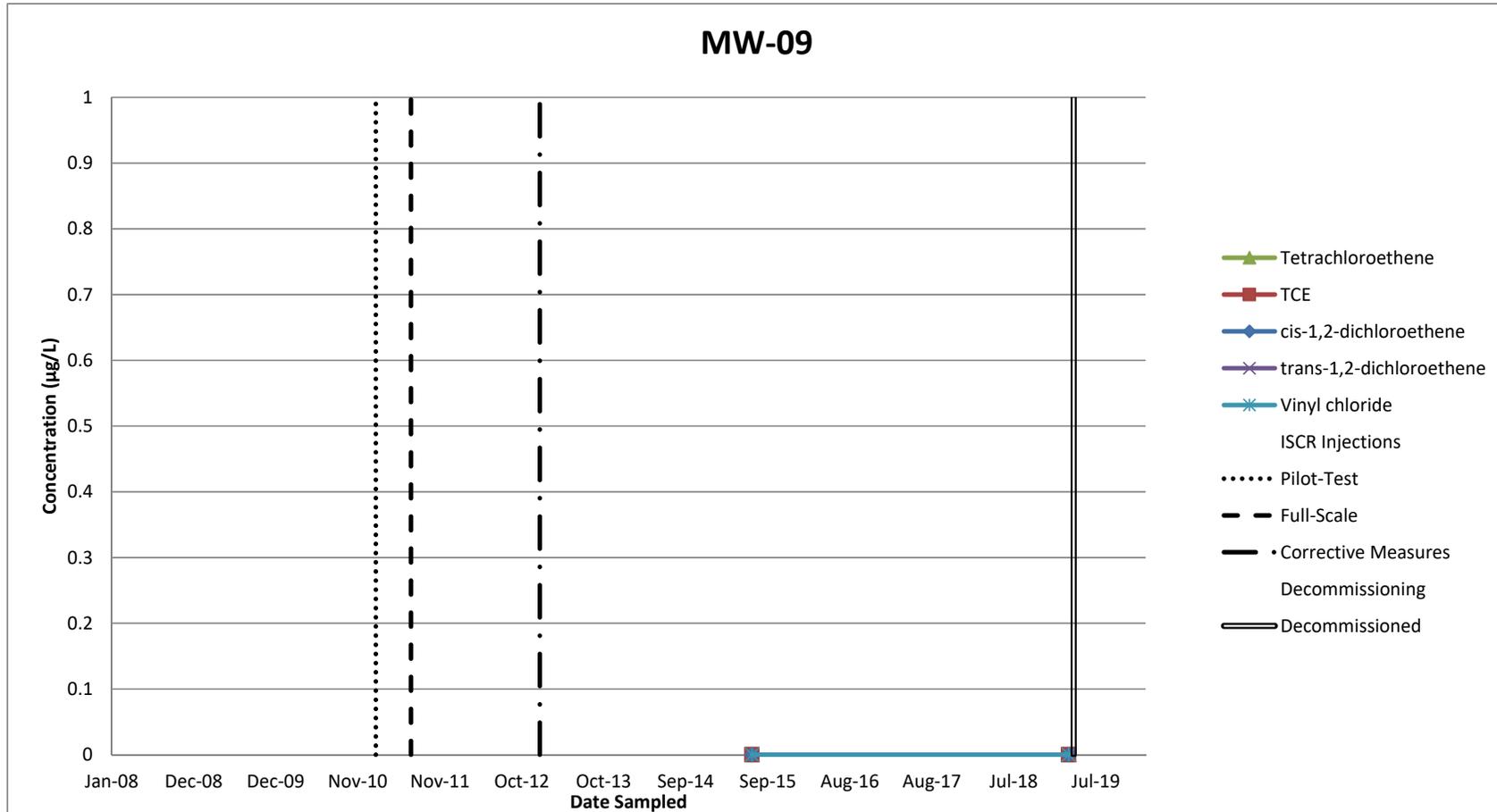
Syracuse Label Company, Inc.  
110 Luther Avenue BCP Site  
Site #C734118





**Appendix F**  
**Time Series Plots**  
**Chlorinated VOCs of Concern**

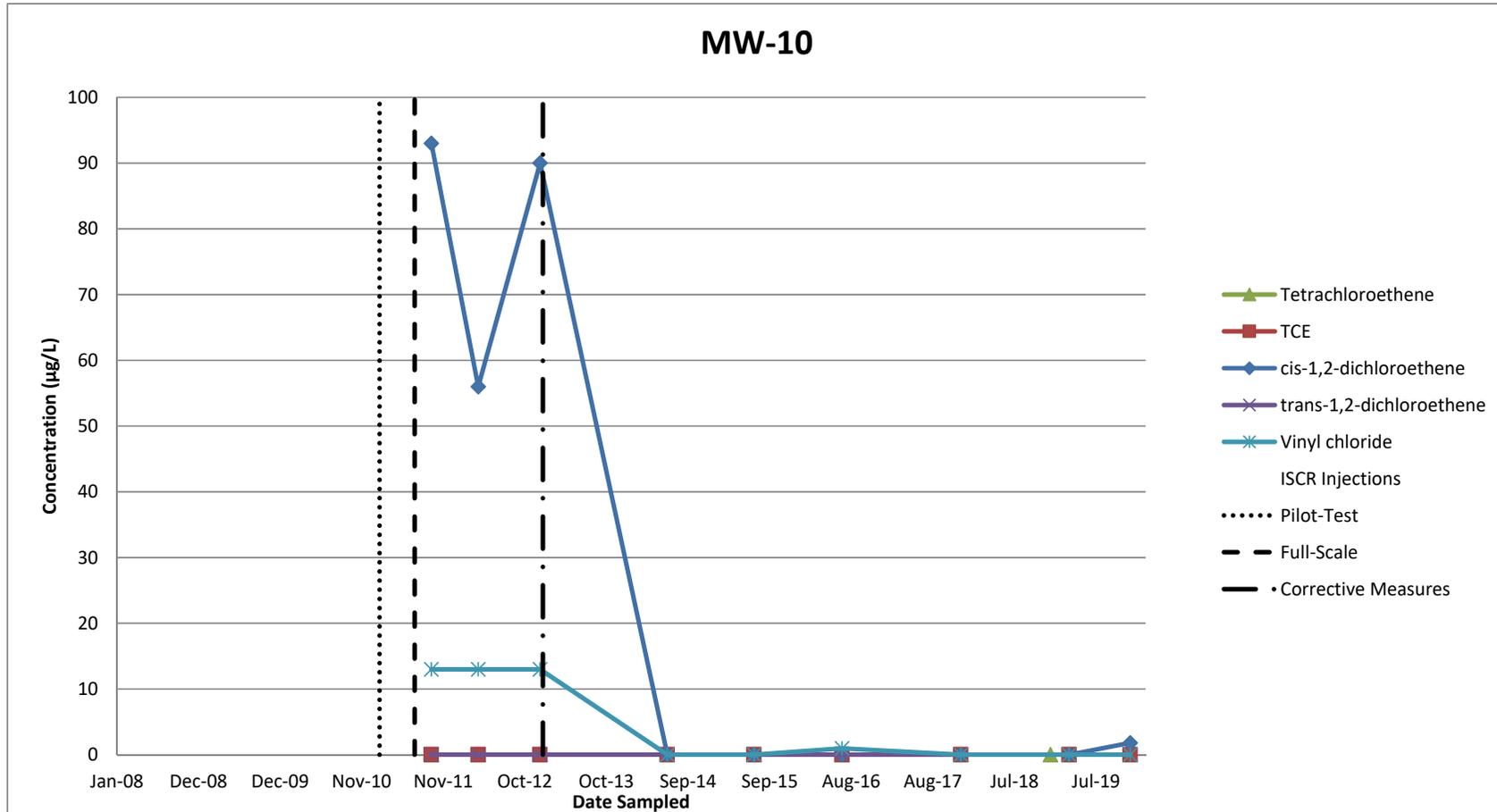
Syracuse Label Company, Inc.  
110 Luther Avenue BCP Site  
Site #C734118





Appendix F  
Time Series Plots  
Chlorinated VOCs of Concern

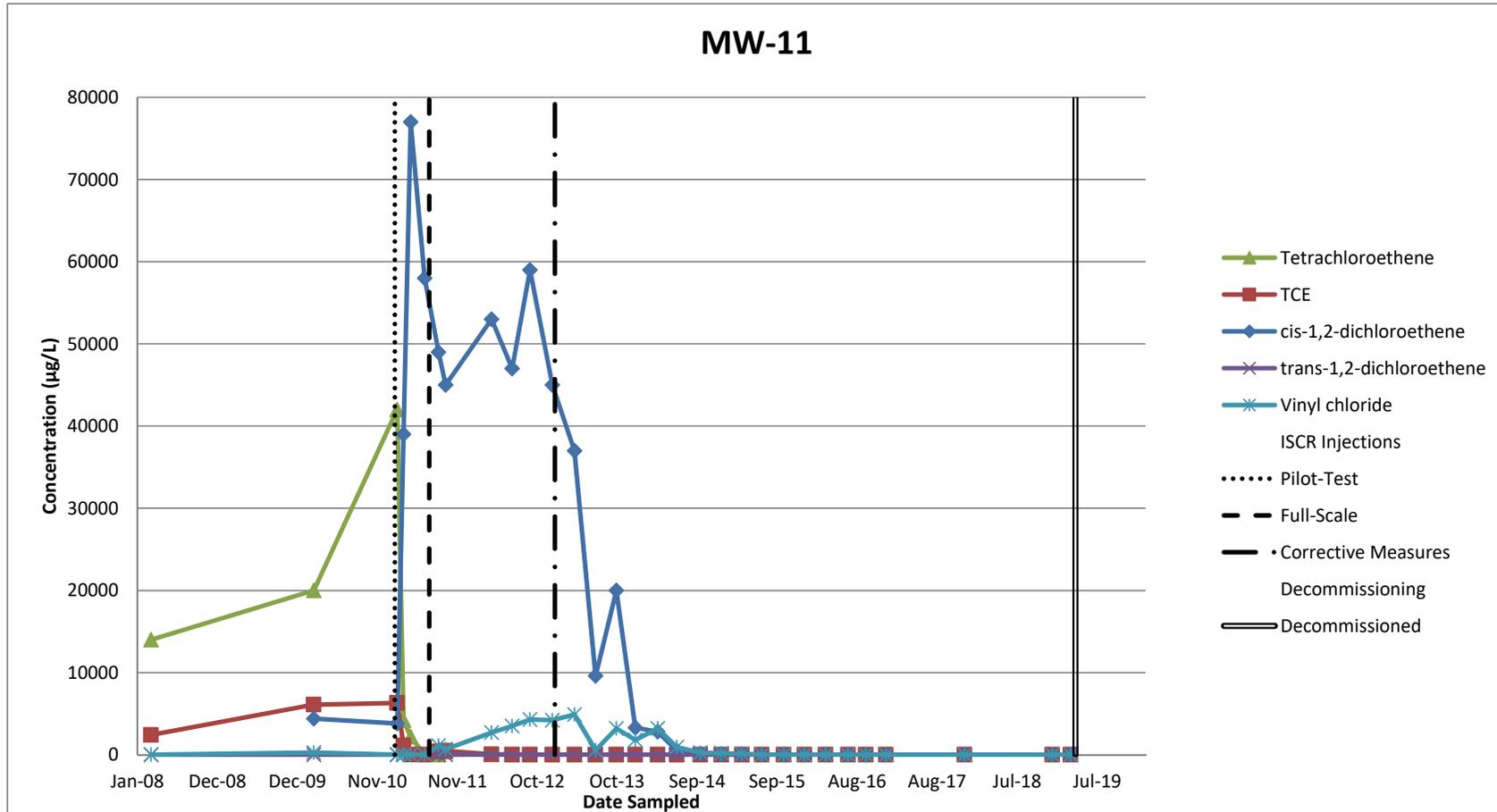
Syracuse Label Company, Inc.  
110 Luther Avenue BCP Site  
Site #C734118





Appendix F  
Time Series Plots  
Chlorinated VOCs of Concern

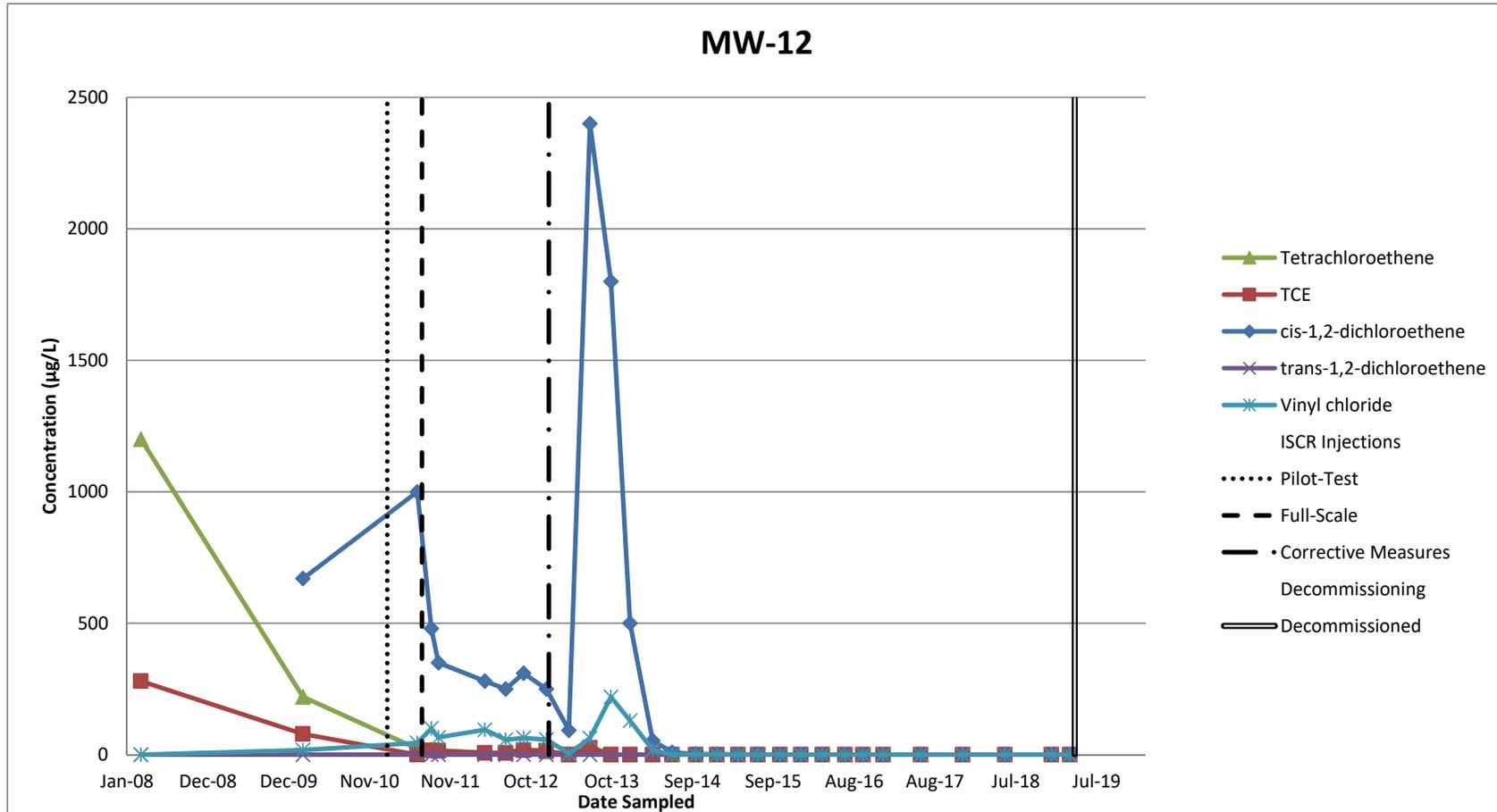
Syracuse Label Company, Inc.  
110 Luther Avenue BCP Site  
Site #C734118





Appendix F  
Time Series Plots  
Chlorinated VOCs of Concern

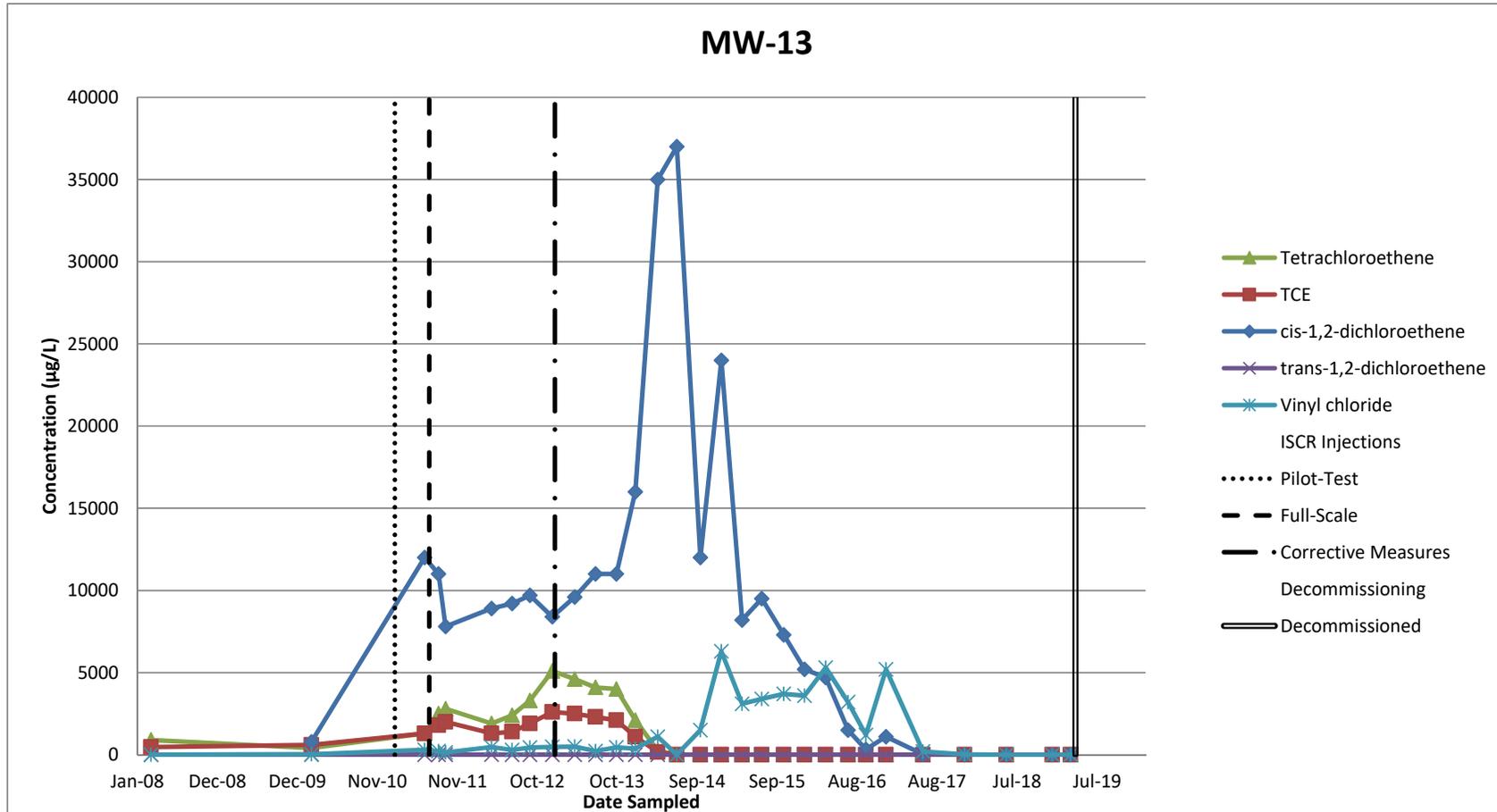
Syracuse Label Company, Inc.  
110 Luther Avenue BCP Site  
Site #C734118





**Appendix F**  
**Time Series Plots**  
**Chlorinated VOCs of Concern**

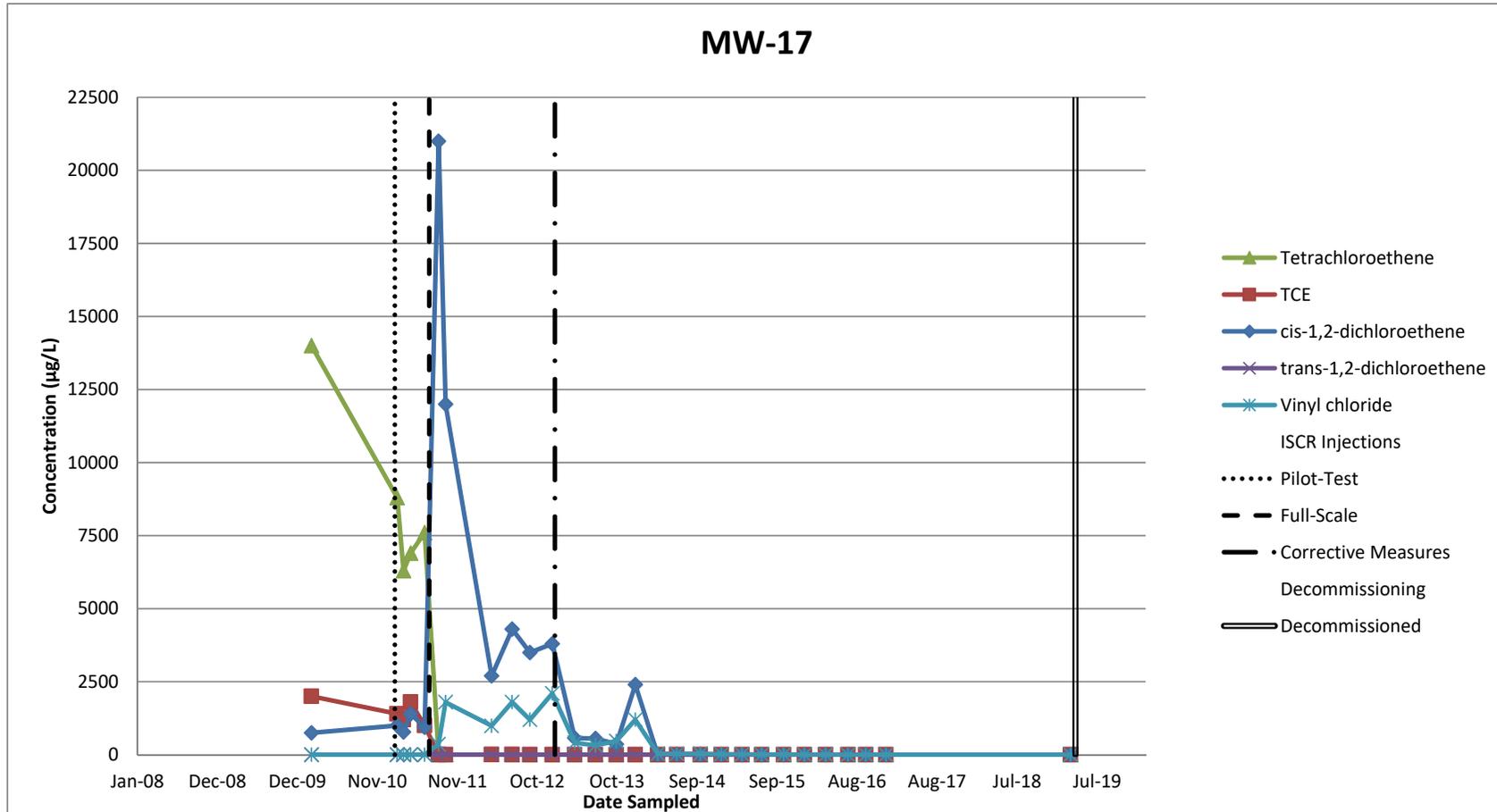
Syracuse Label Company, Inc.  
110 Luther Avenue BCP Site  
Site #C734118





Appendix F  
Time Series Plots  
Chlorinated VOCs of Concern

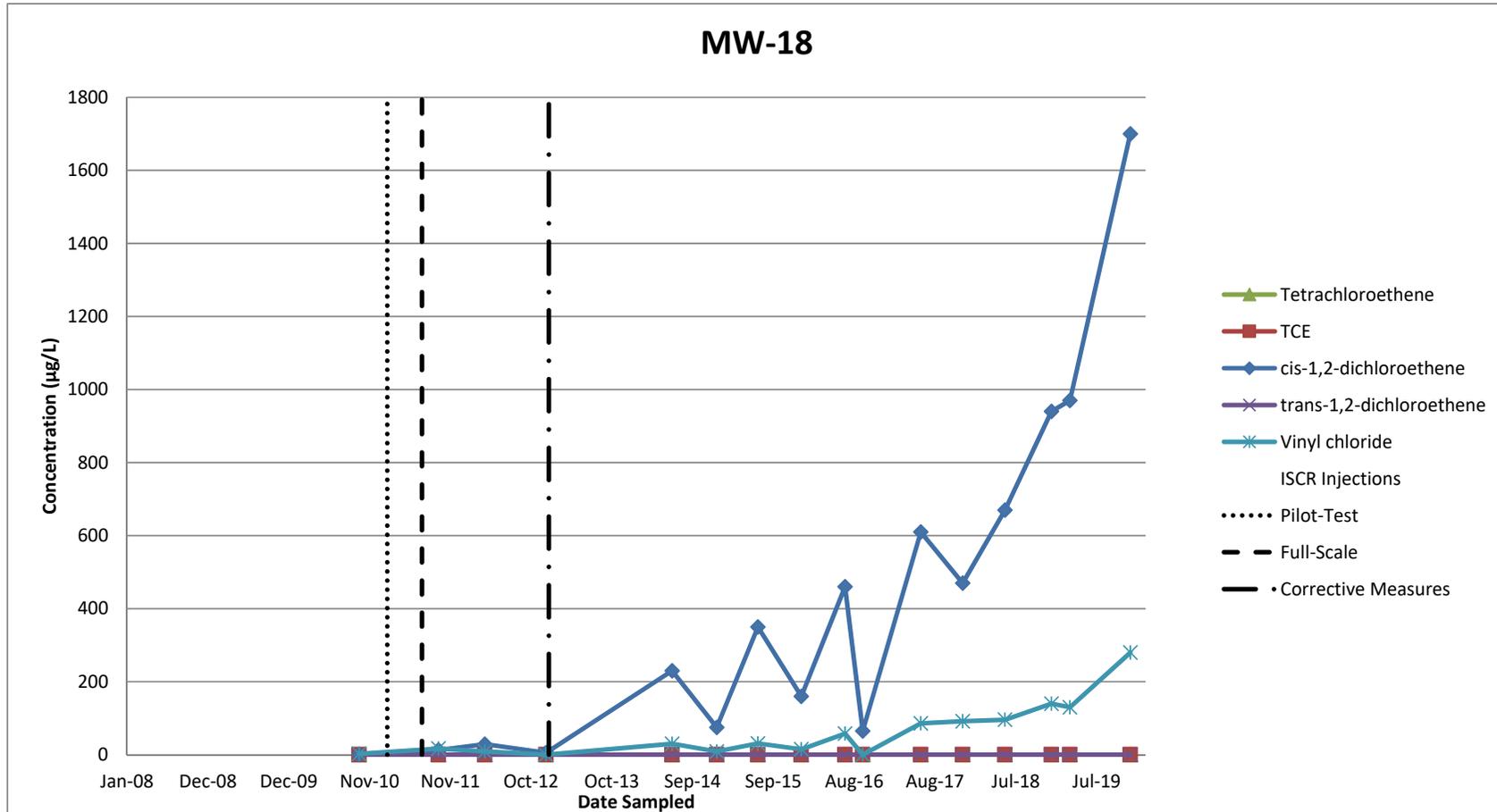
Syracuse Label Company, Inc.  
110 Luther Avenue BCP Site  
Site #C734118





**Appendix F**  
**Time Series Plots**  
**Chlorinated VOCs of Concern**

Syracuse Label Company, Inc.  
110 Luther Avenue BCP Site  
Site #C734118





# Appendix G

## Change of Use and/or Ownership Documentation

**NOTICE OF TRANSFER OF CERTIFICATE OF COMPLETION**

**Brownfield Cleanup Program**

**Pursuant to 6 NYCRR Part 375-1.9(f)**

**Site Name:** 110 Luther Ave Site, **Site ID No.** 734118

**Site Address:** 110 Luther Avenue, Liverpool, NY 13088

**PLEASE TAKE NOTICE**, that pursuant to Article 27, title 14 of the Environmental Conservation Law and 6 NYCRR 375-1.9(f), Syracuse Label Company, Inc. hereby transfer(s) the Certificate of Completion (COC) issued by the Department of Environmental Conservation on 12/22/2011 for the site described below. Such COC was issued upon satisfaction of the Commissioner, following review by the Department of the final engineering report and data submitted pursuant to the Brownfield Cleanup Agreement, as well as any other relevant information regarding the Site, that the remediation requirements set forth in ECL Article 27, title 14 had been or would be achieved in accordance with the time frame, if any, established in the remedial work plan.

**PLEASE TAKE NOTICE**, that 110 Luther Ave Site is located at 110 Luther Ave, Liverpool, Onondaga County. The Site is bearing DEC site number: 734118 and is more fully described on Schedule A attached hereto ("Site"). The Tax Map Identification Number(s) for site is/are:

085-12-04.1,  
085-12-05.0,  
085-12-06.1,  
085-12-08.0,  
085-12-09.0

**PLEASE TAKE NOTICE**, that a Notice of Certificate of Completion for the Site was filed in the Onondaga County Clerk's Office on 1/6/2012 in Liber 5186 Of Deeds at Page 644.

**PLEASE TAKE NOTICE**, that on 3/27/2019 Syracuse Label Co., Inc. conveyed title to the Site to Box Capital, LLC by Deed recorded in Instrument Number 2019-00011472.

**PLEASE TAKE NOTICE**, Syracuse Label Company, Inc. hereby transfers the Certificate to the following new property owner(s) as provided for pursuant to Article 27, title 14 of the Environmental Conservation Law and 6 NYCRR 375-1.9(f):

Box Capital, LLC  
*(New Property Owner)*

3883 Dawes Avenue, Clinton, NY 13323  
*(Address)*

82-3122021  
*(Employer Identification Number)*

\_\_\_\_\_  
*Representative (if applicable)*

\_\_\_\_\_  
*(Address)*

SCHEDULE "A" PROPERTY DESCRIPTION

Address of property: 110 Luther Ave, T/O Salina, Onondaga County, New York Tax Map: 085 - 12 - 4.1, 5.0, 6.1, 8.0 and 9.0.

All that tract or parcel of land, situate in the Town of Salina, County of Onondaga and State of New York, being Lot Nos. 427 - 433, 437, 438 and 467 - 478, on a map of Buckley Gardens dated May 18, 1914 made by A.L. Eliot, C.E. and filed in the Onondaga County Clerk's Office May 20, 1914 as Map No. 1484.

Also, all that tract of parcel of land, situate in the Town of Salina, County of Onondaga and State of New York, being part of Farm Lot 135 in said Town, being part of Buckley Gardens according to a map dated May 18, 1914, filed in the Onondaga County Clerk's Office May 20, 1914 as Map No. 1484, being part of Albion Avenue, formerly, according to said Buckley Gardens map, being a strip of land beginning at the intersection of the most northerly corner of Lot 468 Buckley Gardens with the southeasterly street boundary of Albion Avenue; thence N 43°59'30" W Deed, a distance of 40.0 feet to a point; thence S 46°00'30" W Deed, distance of 60.0 feet to a point; thence S 43°59'30" E Deed, a distance of 40.0 feet to a point; thence N 46°00'30" E Deed, a distance of 60.0 feet to the point and place of beginning. Intending to describe a strip of land conveyed to Syracuse Label Company, Inc. by deed recorded in Book 3972 of Deeds at page 48 & c. in the Onondaga County Clerk's Office.

Excepting and reserving a right of way over the above described parcel to and over the existing pavement of Albion Avenue for purpose of ingress and egress. Being a strip of land that is 15.0 feet in width and 60.0 feet in length.

The above described parcels of land are more particularly and correctly described together as follows:

All that tract or parcel of land situate in the Town of Salina, County of Onondaga and State of New York, being part of Buckley Gardens according to a map of said tract made by A.L. Eliot, C.E. dated May 18, 1914 and filed in the Onondaga County Clerk's Office May 20, 1914 as Map No. 1484, bounded and described as follows:

Beginning at the intersection of the southwesterly boundary of Knapp Street with the northwesterly boundary of Luther Avenue; running thence S 46°00'30" W, along said northwesterly boundary of Luther Avenue, a distance of 220.00 feet to a point therein, said point being the most southerly corner of Lot No. 433 in said Buckley Gardens; thence 43°36' 17" W, along the southwesterly boundary of said Lot No. 433, a distance of 90.00 feet to the most westerly corner thereof; thence S 46°00'30" W, along the southeasterly boundaries of Lot Nos. 471, 470 and 469, respectively, a distance of 90.00 feet to the most northerly corner of Lot No. 437 in Buckley Gardens; thence S 43°36' 17" E, along the northeasterly boundary of said Lot No. 437, a distance of 90.00 feet to the most easterly corner thereof, said point being in the aforementioned northwesterly boundary of Luther Avenue; thence S 46°00'30" W, along said northwesterly boundary of Luther Avenue, a distance of 60.00 feet to the most southerly corner of Lot No. 438; thence N 43°36' 17" W, along the southwesterly boundaries of Lot Nos. 438 and 467, respectively, and its northwesterly prolongation, a distance of 220.00 feet to a point in the southeasterly boundary of Interstate Route No. 81; thence N 46°00'30" E, along said southwesterly boundary of Interstate Route No. 81, a distance of 60.00 feet to a point therein, said point being on the northwesterly prolongation of the northeasterly boundary of Lot No. 468;

thence S 43°36'17" E, along said northwesterly prolongation of said northeasterly boundary of Lot No. 468, a distance of 40.00 feet to the most northerly corner of said Lot No. 468, said point being in the southeasterly boundary of said Albion Avenue; thence N 46°00'30" E, along said southeasterly boundary of Albion Avenue, a distance an 310.00 feet to the intersection of the aforementioned southwesterly boundary of Knapp Street with said southeasterly boundary of Albion Avenue; thence S 43°36' 17" E, along said southwesterly boundary of Knapp Street, a distance of 180.00 feet to the point of beginning.

**PLEASE TAKE FURTHER NOTICE**, that if there is an environmental easement for this site, that Box Capital, LLC recognize(s) and agree(s) to implement the Department-approved Site Management Plan, and any amendments thereto, and to fully comply with all restrictions and affirmative obligations contained therein as well as in the Environmental Easement for the Site.

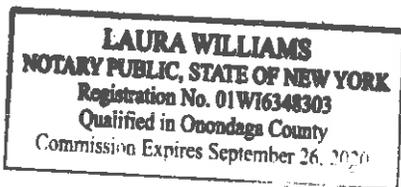
**WHEREFORE**, the undersigned have signed this Notice of Transfer of Certificate of Completion as of this 4<sup>th</sup> of April, 2019.

Syracuse Label Company, Inc.

By Kathleen Alaimo

Sworn to before me this  
4<sup>th</sup> of April, 2019.

(notary signature) Laura Williams

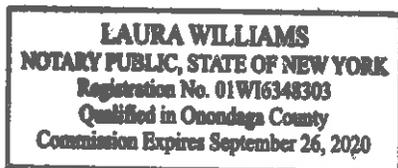


Box Capital, LLC

By Anthony Curimaine

Sworn to before me this  
8 of April, 2019.

(notary signature) Laura Williams



**PLEASE TAKE FURTHER NOTICE**, that if there is an environmental easement for this site, that Box Capital, LLC recognize(s) and agree(s) to implement the Department-approved Site Management Plan, and any amendments thereto, and to fully comply with all restrictions and affirmative obligations contained therein as well as in the Environmental Easement for the Site.

**WHEREFORE**, the undersigned have signed this Notice of Transfer of Certificate of Completion as of this 4<sup>th</sup> of April, 2019.

Syracuse Label Company, Inc.

By Kathleen Alaimo

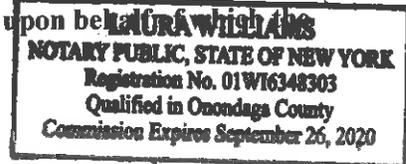
Sworn to before me this 4<sup>th</sup> of April, 2019.

(notary signature) Laura Williams

STATE OF NEW YORK  
COUNTY OF ONONDAGA

On the 4<sup>th</sup> day of April, 2019 before me, the undersigned, a notary public in and for said state, personally appeared Kathleen Alaimo personally known to me or proved to me on the basis of satisfactory evidence, to be the individuals whose names are subscribed to the within instrument and acknowledged to me that they executed the same in their capacities, and that by their signatures on the instrument, the individuals or the persons upon behalf of which the individuals acted, executed the instrument.

Laura Williams  
NOTARY PUBLIC



By Anthony Carricone

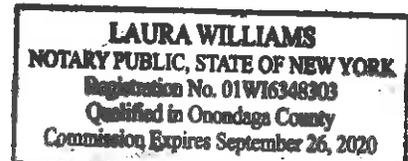
Sworn to before me this 8 of April, 2019.

(notary signature) Laura Williams

STATE OF NEW YORK  
COUNTY OF ONONDAGA

On the 8 day of April, 2019 before me, the undersigned, a notary public in and for said state, personally appeared Anthony Carricone personally known to me or proved to me on the basis of satisfactory evidence, to be the individuals whose names are subscribed to the within instrument and acknowledged to me that they executed the same in their capacities, and that by their signatures on the instrument, the individuals or the persons upon behalf of which the individuals acted, executed the instrument.

Laura Williams  
NOTARY PUBLIC









## about GHD

GHD is one of the world's leading professional services companies operating in the global markets of water, energy and resources, environment, property and buildings, and transportation. We provide engineering, environmental, and construction services to private and public sector clients.

**Damian Vanetti, P.E.**  
damian.vanetti@ghd.com  
315.802.0340

**Ian McNamara**  
ian.mcnamara@ghd.com  
315.802.0312

[www.ghd.com](http://www.ghd.com)