Periodic Review Report

110 Luther Avenue BCP Site (#C734118)
March 17, 2021 to March 17, 2022 Reporting Period

Syracuse Label Company Inc.

April 29, 2022

→ The Power of Commitment

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Executive Summary

This report is subject to, and must be read in conjunction with, the limitations set out in section 1.2 and the assumptions and qualifications contained throughout the Report.

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, May 2019, and October 2020 by GHD Consulting Services Inc.). The SMP requires the maintenance and monitoring of Site institutional controls (ICs) and engineering controls (ECs) and annual submittal of a Periodic Review Report (PRR).

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 personnel. The SSDS was operating as intended for this PRR's certification period.

The ICs for the Site include: (1) the designated use of the property for commercial or industrial uses only; (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 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 at the remaining Site groundwater monitoring wells, MW-1, MW-7, MW-8, MW-10, and MW-18. Groundwater samples are analyzed for chlorinated VOCs only, in accordance with the current NYSDEC-approved revised SMP (GHD Consulting Services Inc., October 2020).

The requirements necessary to discontinue Site maintenance and/or monitoring have not been met at this time. As a result, these requirements should continue as identified in the SMP. There is no need to propose a change to the frequency of the PRR at this time.

Based on the March 16, 2022 PRR Site inspection, there were three recommended maintenance items identified:

1. Protection (i.e., bollards) should be added around SSDS suction risers S-8 and S-14 to provide a level of protection against material storage operations and moving equipment.
2. The landscaped areas experiencing some rutting of the soil cover should be regraded and reseeded to ensure the long-term integrity of the soil cover system in those portions of the Site.
1. The areas of subsidence in the asphalt pavement north of the Site building should be addressed to ensure the long-term integrity of the soil cover system in this portion of the Site.

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1. Introduction

1.1 Purpose of this Report

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 current NYSDEC-approved 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.

1.2 Scope and Limitations

This report has been prepared by GHD for Syracuse Label Company Inc. and may only be used and relied on by Syracuse Label Company Inc. for the purpose agreed between GHD and Syracuse Label Company Inc. as set out in this report.

GHD otherwise disclaims responsibility to any person other than Syracuse Label Company Inc. arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions, and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions, and any recommendations in this report are based on assumptions made by GHD throughout this report. GHD disclaims liability arising from any of the assumptions being incorrect.

The opinions, conclusions, and any recommendations in this report are based on information obtained from, and testing undertaken at or in connection with, specific sample points. Site conditions at other parts of the Site may be different from the Site conditions found at the specific sample points.

Investigations undertaken in respect of this report are constrained by the particular Site conditions, such as the location of buildings, services, and vegetation. As a result, not all relevant Site features and conditions may have been identified in this report.

Site conditions (including the presence of hazardous substances and/or Site contamination) may change after the date of this Report. GHD does not accept responsibility arising from, or in connection with, any change to the Site conditions. GHD is also not responsible for updating this report if the Site conditions change.

GHD has prepared this report on the basis of information provided by Syracuse Label Company Inc. and others who provided information to GHD (including Government authorities), which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

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 in April 2019; and the COC was subsequently transferred on April 8, 2019. Currently, the property and building are 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 consist of maintaining the soil cover system and installing a sub-slab depressurization system (SSDS) in the existing on-site building. The ICs include 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 the 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.
- *3rd and 4th 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.
- *3rd 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.
- *3rd 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.
- *Periodic Review Report – March 17, 2019 – March 17, 2020, 110 Luther Avenue BCP Site (BCP Site #C734118),* GHD Consulting Services Inc., April 2020.
- *Monitoring Well Decommissioning Request 2020,* GHD Consulting Services Inc., July 29, 2020.
- *2020 Monitoring Well Decommissioning,* GHD Consulting Services Inc., October 2, 2020.
- *Site Management Plan,* Revised by: GHD Consulting Services Inc., October 2020.
- *Periodic Review Report – March 17, 2020 to March 17, 2021, 110 Luther Avenue BCP Site (BCP Site #C734118),* GHD Consulting Services Inc., April 2021.
- *Fall 2021 Groundwater Monitoring Results,* GHD Consulting Services Inc., January 17, 2022.

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 16, 2022 (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 by SWRNA; Revised February 2017 by GHD; Revised May 2019 by GHD; Revised October 2020 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 for any purposes.

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.

The Site is currently used by Box Capital and UniFirst for commercial purposes, in accordance with the current NYSDEC-approved SMP.

3.1.5 Ownership of Adjacent Property

Based on information obtained from the Onondaga County Real Property Tax Services website (https://ocfintax.ongov.net/Imate/search.aspx) on March 16, 2022, 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 by SWRNA; Revised February 2017 by GHD; Revised May 2019 by GHD; Revised October 2020 by GHD) and are discussed in greater detail below.

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 this certification period (Appendix C). GHD personnel also completed a system inspection form during the annual PRR certification Site inspection, performed on March 16, 2022 (Appendix C). As indicated on the inspection forms, the system was operating as intended during this PRR's certification period, with the exception of one necessary repair to the SSDS identified during the September 2021 system inspection. The September 2021 inspection revealed that the suction riser at penetration S-11 was broken as the result of an impact and needed repair. The necessary repair was performed by Box Capital personnel during October 2021 and the subsequent October monthly inspection indicated that the system was operating as intended. Additionally, in November 2021 a bollard was installed to protect penetration S-11 from future potential damage. No other temporary shutdowns or repairs were reported during this PRR's certification period.

GHD's recommendation for the 2020/2021 reporting period to protect SSDS suction riser S-14 via bollard installation was not executed; this recommendation was restated in the March 16, 2022 Site inspection report. In addition, the inspection report noted that riser S-8 should also have bollards installed for protection from potential damage.

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 general 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).

GHD's recommendations for the 2020/2021 reporting period included the suggested removal of the trees in the alleyway between building sections along Luther Avenue, the repair and/or sealing of surface cracks in the concrete slab located in the main warehouse portion of the building, and regrading of minor soil rutting presumably from snow removal activities. Work associated with these recommendations was completed by Box Capital during this certification period. Available representative photographs of the completed work are included in Appendix C.

During GHD's Site visit on March 16, 2022, those interior areas that could be observed (i.e., accessible portions of the building slab) appeared to be intact and functioning as intended. Landscaped areas near the southern driveway from Luther Avenue and the southwest corner of the Site had some rutting of the soil cover observed, presumably from snow removal activities. In addition, surface cracks and isolated subsidence were observed in the asphalt pavement parking area on the north side of the building. The subsidence was partially backfilled with stone and underlying soils were not exposed. Representative photographs of these observations are included in Appendix C.

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

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

4. Operations and Monitoring

During this PRR certification period, the current NYSDEC-approved SMP (GHD, October 2020 Revision) required semi-annual groundwater monitoring of the five remaining Site 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 levels on the Site. Monitoring wells MW-1, MW-7, MW-8, and MW-10 are on-Site between the building and Luther Avenue, while MW-18 is off-Site across Luther Avenue.

The groundwater monitoring events occurred on May 20, 2021, and November 19, 2021. No additional monitoring was required or occurred during this PRR certification period.

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, on April 20, 2021, one 55-gallon drum of purge water was characterized as non-RCRA non-DOT regulated (water) and disposed of off-Site at the American Recyclers Company in Tonawanda, NY (Appendix C).

The groundwater monitoring events were completed in accordance with the current NYSDEC-approved 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:

– June 09, 2021 (spring 2021 sampling)
– January 17, 2022 (fall 2021 sampling)

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

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 2021 monitoring event) indicate non-detect (ND) concentrations for PCE, TCE, and trans-DCE (Table 2 and Appendix E) for all groundwater samples. MW-7 also had ND concentrations of degradation byproducts cis-DCE and VC, while MW-10 also had an ND concentration of the degradation byproduct cis-DCE. The samples taken from MW-1, MW-8, and MW-18, identified concentrations of the degradation byproducts cis-DCE and VC, each of which were above groundwater standards, with the exception of cis-DCE in the sample from MW-08, as shown in the following summary tables.

MW-1		
Target Compounds	Baseline Concentrations (February 2010)	Most Recent Concentration (November 2021)
PCE	60 µg/L	2.8 J µg/L
TCE	39 µg/L	2.1 J µg/L
cis-DCE	150 µg/L	72 µg/L
trans-DCE	0.91 µg/L	ND
VC	33 µg/L	110 µg/L

MW-7		
Target Compounds	Baseline Concentrations (February 2010)	Most Recent Concentration (November 2021)
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)	Most Recent Concentration (November 2021)
PCE	3,900 µg/L	ND
TCE	860 µg/L	ND
cis-DCE	2,500 µg/L	0.91 J µg/L
trans-DCE	ND	ND
VC	250 µg/L	3 µg/L

MW-10		
Target Compounds	Baseline Concentrations (September 2011)	Most Recent Concentration (November 2021)
PCE	ND	ND
TCE	ND	ND
cis-DCE	93 µg/L	ND
trans-DCE	ND	ND
VC	13 µg/L	1.7 µg/L

MW-18		
Target Compounds	Baseline Concentrations (October 2010)	Most Recent Concentration (November 2021)
PCE	ND	ND
TCE	ND	ND
cis-DCE	ND	6,500 µg/L
trans-DCE	ND	ND
VC	2.7 µg/L	6,300 µg/L

The concentrations of PCE and TCE detected in samples taken from the remaining Site monitoring wells continue to generally be non-detect, with the exception of sporadic detections at relatively low concentrations below groundwater standards in samples taken from MW-1. Concentrations of cis-DCE and VC showed an 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 in samples taken from MW-7, MW-8, and MW-10 have generally shown a decreasing trend following implementation of the corrective measures as these compounds undergo further degradation (Table 2 and Appendix E). Concentrations of cis-DCE and VC in samples taken from MW-1 are also indicating decreasing trends after the initial increasing trends.

The concentrations of cis-DCE and VC in samples taken from off-Site well MW-18 have generally indicated an increasing trend with some fluctuations since remedial actions and corrective measures were performed on-Site. The cis-DCE and VC concentrations identified in samples taken during the November 2021 monitoring event were the highest detected to date and represent an increase of 333% and 1,240%, respectively, from those identified during the May 2021 monitoring event. Concentrations of cis-DCE (6,500 µg/L) and VC (6,300 µg/L) identified in the sample taken from MW-18 in November 2021 have not been identified at similar concentrations in samples taken from on-Site monitoring wells MW-1, MW-10, or MW-8 (VC only) since monitoring began at the Site. In addition, cis-DCE and VC concentrations in samples taken from on-Site monitoring wells MW-7 and MW-8 have not identified similar concentrations since the 2013 monitoring events. At this time, it is uncertain if the increases observed in the sample taken from MW-18 are solely attributable to the Site. As known to the Department, significant construction activities have been conducted by third parties in the area of MW-18. It is likely that the increases observed in the sample taken from MW-18 are attributable to those activities.

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

5. Recommendations

Based on a review of the groundwater data, it is recommended that groundwater monitoring continue semi-annually at the five remaining Site monitoring wells (MW-1, MW-7, MW-8, MW-10, and MW-18). The groundwater monitoring program can be reviewed and modified as appropriate in the future, with the approval of the NYSDEC and NYSDOH.

Based on the March 16, 2022 Site inspection, the current ICs and ECs for the Site should remain in place to ensure the continued effectiveness and protectiveness of the remedy. Based on observations during the Site inspection, GHD identified the following maintenance recommendations:

1. Protection (i.e., bollards) should be added around SSDS suction risers S-8 and S-14 to provide a level of protection against material storage operations and moving equipment.
2. The landscaped areas experiencing some rutting of the soil cover should be regraded and reseeded to ensure the long-term integrity of the soil cover system in those portions of the Site.
3. The areas of subsidence in the asphalt pavement north of the Site building should be evaluated and appropriately addressed to ensure the long-term integrity of the soil cover system in this portion of the Site.

Documentation of corrective measures associated with each of these identified maintenance items should be maintained and included in next year's PRR. Monthly Site inspections should be continued to assess the proper functioning of the SSDS and that the soil cover ECs are in place and are functioning as intended. The ICs should continue to be evaluated in accordance with the current NYSDEC-approved SMP, and at a minimum prior to the end of the next PRR certification period in March 2023.

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
	5/29/2020			2.23	11.42	95.52	0.37
	11/19/2020			2.24	11.38	95.51	0.37
	5/20/2021			1.91	11.38	95.84	0.38
	11/19/2021			2.13	11.43	95.62	0.37
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
	5/29/2020			2.37	16.72	94.91	2.30
	11/19/2020			2.58	16.65	94.70	2.25
	5/20/2021			2.55	16.65	94.73	2.26
	11/19/2021			2.34	16.75	94.94	2.31

DTW - Depth to water
DOW - Depth of well
NM - Not measured

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		
	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
	5/29/2020			1.88	17.08	95.50	2.43
	11/19/2020			2.49	17.05	94.89	2.33
	5/20/2021			2.29	17.04	95.09	2.36
	11/19/2021			2.24	17.07	95.14	2.37
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		
	3/8/2019			2.13	14.21	95.21	1.93
	11/25/2019			2.31	14.09	95.03	1.88
	5/29/2020			2.08	14.18	95.26	1.94
	11/19/2020			2.64	14.20	94.70	1.85
	5/20/2021			2.77	14.20	94.57	1.83
	11/19/2021			2.31	14.30	95.03	1.92

DTW - Depth to water
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NM - Not measured

Table 1
Groundwater Elevations

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
	5/29/2020			2.12	12.83	94.74	1.71
	11/19/2020			2.53	12.78	94.33	1.64
	5/20/2021			2.56	12.78	94.30	1.64
	11/19/2021			2.17	12.85	94.69	1.71

DTW - Depth to water
DOW - Depth of well
NM - Not measured

Table 2
Summary of Groundwater Sample Analytical Results

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

		VOCs				
		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	**60**	**39**	**150**	0.91J	**33**
	9/11/2011	**72**	**34**	**110**	<0.76U	**12**
	3/30/2012	**45**	**19**	**100**	<1U	**29**
	12/20/2012	**25**	**21**	**78**	<1U	**25**
	6/19/2014	0.92J	1.9	**59**	<1U	**17**
	6/25/2015	<1U	0.59J	**130**	<1U	**42**
	9/29/2015	1.3J	2.4	**220**	<2U	**94**
	7/7/2016	1.1J	**7.2**	**2,500**	3.4	**1,100**
	9/23/2016	<0.36U	1.7	**410**	1.3	**160**
	5/31/2017	<3.6U	**6.4J**	**910**	<9U	**250**
	11/29/2017	<3.6U	<4.6U	**440**	<9U	**290**
	5/31/2018	<3.6U	<4.6U	**1,000**	<9U	**580**
	12/18/2018	<3.6U	<4.6U	**550**	<9U	**380**
	3/8/2019	1.7J	**11**	**560**	2	**200**
	11/25/2019	<3.6U	<4.6U	**430**	<9U	**550**
	5/29/2020	<3.6U	<4.6U	**470**	<9U	**570**
	11/19/2020	<3.6U	<4.6U	**140**	<9U	**210**
	5/20/2021	<1.4U	<1.8U	**110**	<3.6U	**130**
	11/19/2021	2.8J	2.1J	**72**	<3.6U	**110**

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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

		VOCs				
		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	**14,000**	**1,700**	**2,600**	<200U	**560**
	2/11/2010	**27,000**	**4,300**	**2,600**	<150U	**260J**
	2/11/2011	**17,000**	**2,600**	**2,600**	<150U	**620J**
	3/11/2011	**6,900**	**3,600**	**14,000**	<76U	**460J**
	4/11/2011	**370J**	**150J**	**17,000**	<150U	**690J**
	6/11/2011	**1,600**	**3,300**	**19,000**	<190U	**1,100J**
	8/11/2011	**240J**	**520J**	**24,000**	<190U	**8,500**
	9/11/2011	**240J**	**380**	**7,400**	<38U	**4,300**
	3/29/2012	**34**	**170J**	**11,000**	**36**	**4,300**
	6/28/2012	<200U	**140J**	**26,000**	<200U	**8,400**
	9/13/2012	<400U	<400U	**27,000**	<400U	**8,900**
	12/21/2012	<400U	<400U	**16,000**	<400U	**8,100**
	3/28/2013	<400U	<400U	**18,000**	<400U	**7,900**
	6/27/2013	<80U	<80U	**4,300**	<80U	**3,300**
	9/26/2013	<80U	<80U	**6,300**	<80U	**3,000**
	12/18/2013	<40U	<40U	**2,300**	<40U	**2,400**
	3/26/2014	<20U	<20U	**1,400**	<20U	**1,500**
	6/18/2014	<20U	<20U	**510**	<20U	**720**
	9/29/2014	<4U	<4U	**32**	<4U	**88**
	12/29/2014	<1.8U	<2.3U	**39**	<4.5U	**31**
	3/30/2015	<5U	<5U	**22**	<5U	**38**
	6/25/2015	<5U	<5U	**6.5**	<5U	**24**
	9/28/2015	<5U	<5U	**21**	<5U	**46**
	12/28/2015	<5U	<5U	<5U	<5U	**9.9**
	3/30/2016	<5U	<5U	4.9J	<5U	**18**
	7/6/2016	<0.36U	<0.46U	1.6	<0.9U	**6.3**
	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
	5/29/2020	<1.4U	<1.8U	**26**	<3.6U	**67**
	11/19/2020	<1.4U	<1.8U	<3.2U	<3.6U	<3.6U
	5/20/2021	<1.4U	<1.8U	<3.2U	<3.6U	<3.6U
	11/19/2021	<1.4U	<1.8U	<3.2U	<3.6U	<0.5U

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

		VOCs				
		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	**6,200**	**920**	**1,600**	<200U	**290**
	2/1/2010	**3,900**	**860**	**2,500**	<15U	**250**
	6/11/2011	**1,500**	**540**	**1,700**	<19U	**200**
	8/11/2011	**380J**	**140J**	**5,100**	**100J**	**4,000**
	9/11/2011	**1,100J**	**420J**	**7,900**	**83J**	**2,800**
	3/30/2012	**82**	**22**	**140**	1.1	**66**
	6/28/2012	**1,000**	**460**	**4,000**	**21**	**1,300**
	9/13/2012	**9,500**	**1,900**	**8,000**	**34**	**2,100**
	12/21/2012	**1,800**	**470**	**6,600**	<100U	**2,700**
	3/28/2013	**800**	**380**	**9,400**	<200U	**4,300**
	6/27/2013	**17J**	<40U	**2,100**	<40U	**2,000**
	9/26/2013	<40U	<40U	**160**	<40U	**67**
	12/18/2013	<40U	<40U	<40U	<40U	**110**
	3/26/2014	<5U	<5U	**330**	<5U	**380**
	6/18/2014	<5U	<5U	**110**	<5U	**67**
	9/29/2014	<1U	<1U	0.46J	<1U	<1U
	12/29/2014	<1.8U	<2.3U	<4.1U	<4.5U	<4.5U
	3/30/2015	<40U	<40U	**2,100**	<40U	**1,300**
	6/25/2015	<40U	<40U	**1,500**	<40U	**430**
	9/29/2015	<10U	<10U	**310**	<10U	**160**
	3/30/2016	<10U	<10U	**610**	<10U	**310**
	7/6/2016	<3.6U	<4.6U	**810**	<9U	**460**
	9/22/2016	<3.6U	<4.6U	**430**	<9U	**760**
	12/20/2016	<0.72U	<0.92U	**96**	<1.8U	**63**
	5/31/2017	<3.6U	<4.6U	**490**	<9U	**310**
	11/29/2017	<0.36U	<0.46U	1	<0.9U	<0.9U
	5/31/2018	<3.6U	<4.6U	**620**	<9U	**740**
	12/18/2018	<1.4U	<1.8U	**120**	<3.6U	**110**
	3/8/2019	<0.72U	<0.92U	**5.5**	<1.8U	**12U**
	11/25/2019	<0.36U	<0.46U	**21**	<0.9U	**28**
	5/29/2020	<0.36U	<0.46U	**48**	<0.9U	**130**
	11/19/2020	<0.36U	<0.46U	**9.6**	<0.9U	**22**
	5/20/2021	<0.36U	<0.46U	**18**	<0.9U	**49**
	11/19/2021	<1.4U	<1.8U	0.91J	<3.6U	**3**

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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

		VOCs				
		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-10	9/11/2011	<0.81U	<0.62U	**93**	<0.76U	**13**
	3/30/2012	<1U	<1U	**56**	<1U	**13**
	12/20/2012	<1U	<1U	**90**	<1U	**13**
	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	0.98J
	11/29/2017	<0.36U	<0.46U	<0.81U	<0.9U	<0.9U
	12/18/2018	0	-	-	-	-
	3/8/2019	<0.72U	<0.92U	<1.6U	<1.8U	<1.8U
	11/25/2019	<0.36U	<0.46U	1.8	<0.9U	<0.9U
	5/29/2020	<0.36U	<0.46U	3.6	<0.9U	**2.7**
	11/19/2020	<0.36U	<0.46U	2.8	<0.9U	**4.6**
	5/20/2021	<0.36U	<0.46U	<0.81U	<0.9U	1.9
	11/19/2021	<1.4U	<1.8U	<3.2U	<3.6U	1.7

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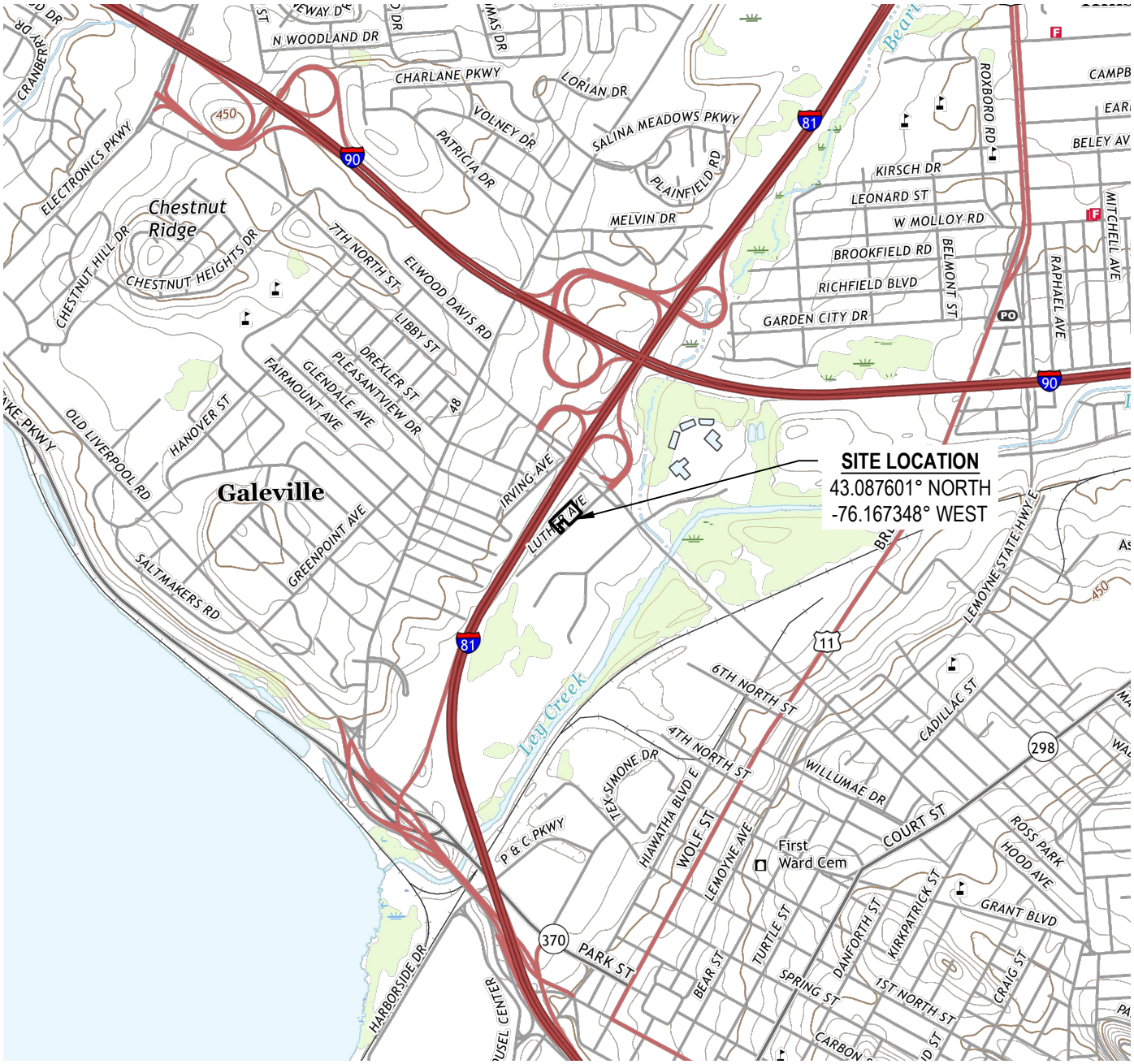
4. (-) - Not analyzed for
5. Feb-11, Mar-11, and Apr-11 data represents pilot test baseline, 1st post-pilot test sampling event, and 2nd post-pilot test sampling event, respectively
6. Jun-11, Aug-11, and Sep-11 data represents full scale ISCR injection baseline, 1st post-ISCR sampling event, and 2nd post-ISCR sampling event, respectively
7. Bold and highlighted result indicates an exceedance of applicable Regulatory Standard

		VOCs				
		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	**2.7J**
	9/11/2011	<0.81U	<0.62U	**13**	<0.76U	**17**
	3/30/2012	<1U	<1U	**29**	<1U	**9.2**
	12/20/2012	<1U	<1U	**5.5**	<1U	<1U
	6/19/2014	<1U	<1U	**230**	<1U	**30**
	12/29/2014	<1.8U	<2.3U	**75**	<4.5U	**9**
	6/25/2015	<5U	<5U	**350**	<5U	**31**
	12/30/2015	<5U	<5U	**160**	<5U	**15**
	7/7/2016	<1.8U	<2.3U	**460**	<4.5U	**58**
	9/22/2016	<1.8U	<2.3U	**65**	<4.5U	<4.5U
	5/31/2017	<1.8U	<2.3U	**610**	<4.5U	**86**
	11/29/2017	<1.8U	<2.3U	**470**	<4.5U	**92**
	5/31/2018	<1.8U	<2.3U	**670**	<4.5U	**96**
	12/18/2018	<1.8U	<2.3U	**940**	<4.5U	**140**
	3/8/2019	<0.72U	<0.92U	**970**	<1.8U	**130U**
	11/25/2019	<7.2U	<9.2U	**1,700**	<18U	**280**
	5/29/2020	<1.8U	<2.3U	**1,700**	<4.5U	**270**
	11/19/2020	<3.6U	<4.6U	**440**	<9U	**120**
	5/20/2021	<3.6U	<4.6U	**1,500**	<9U	**470**
	11/19/2021	<1.4U	<1.8U	**6,500**	<3.6U	**6,300**

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

Figures



Contour Interval: 10 Feet

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

QUADRANGLE LOCATION

N

0 1000 2000 3000 4000'

SCALE 1"=2000' AT ORIGINAL SIZE

SYRACUSE LABEL COMPANY, INC.
PERIODIC REVIEW REPORT FOR BCP SITE #C734118
MARCH 17, 2021 TO MARCH 17, 2022

Project No. **11222535**
Date **04.2022**

SITE LOCATION MAP

FIGURE 1

Filename: \\ghdnet\ghd\US\Syracuse\Projects\564\11222535\Digital_Design\Figures\11222535-RPT02-FIG01-Site_Location.dwg
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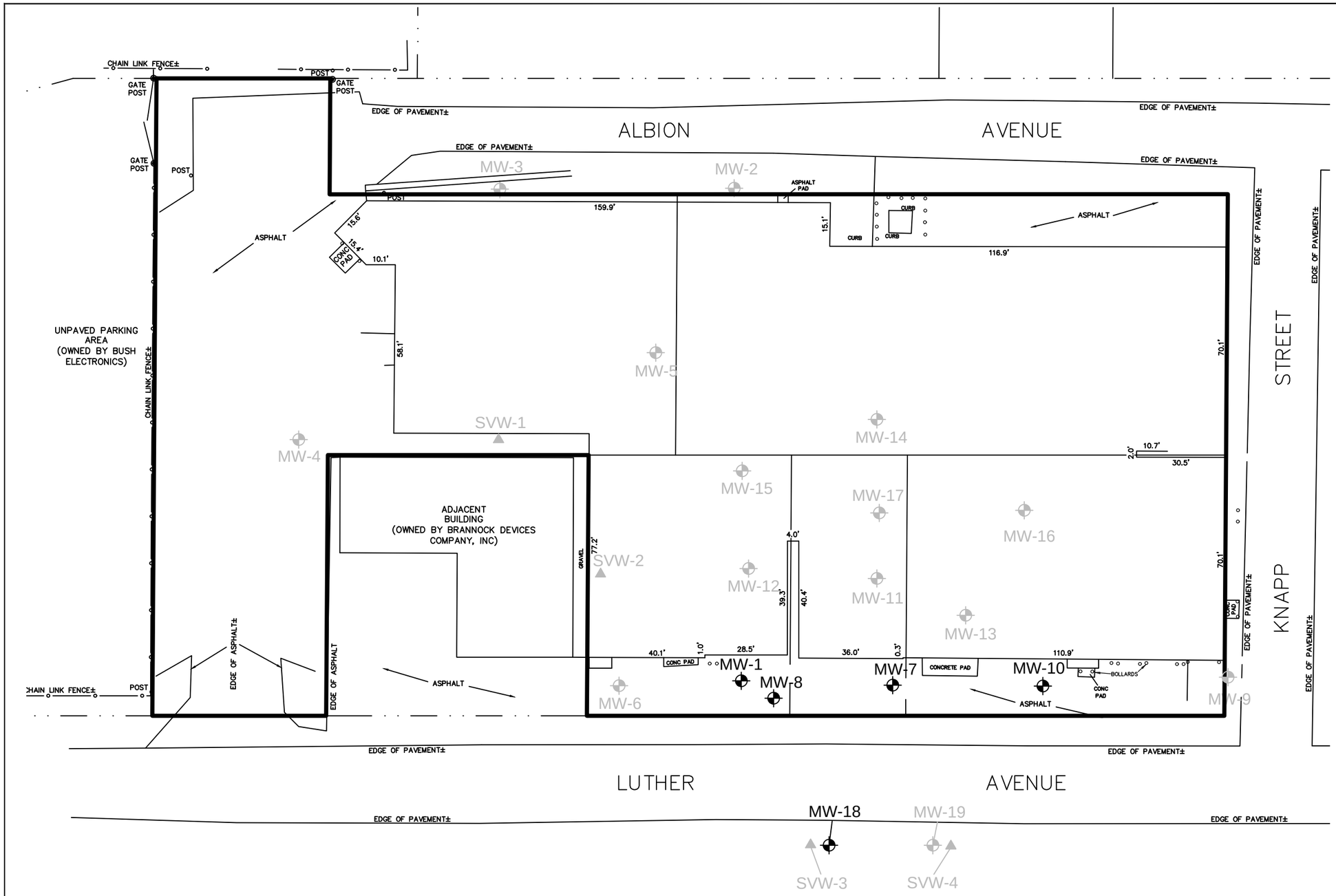

LEGEND:

- 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, MARCH 2019, OR SEPTEMBER 2020 (SURVEYED)
- SVW-1 — SOIL VAPOR MONITORING WELL LOCATION AND ID DECOMMISSIONED DECEMBER 2016 OR SEPTEMBER 2020 (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.

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

0 18 36 54 72'
SCALE 1"=36' AT ORIGINAL SIZE

GHD

SYRACUSE LABEL COMPANY, INC.
PERIODIC REVIEW REPORT FOR BCP SITE #C734118
MARCH 17, 2021 TO MARCH 17, 2022

SITE LAYOUT

Project No. **11222535**
Date **04.2022**

FIGURE 2

Data Source

Filename: \\ghdnet\ghd\US\Syracuse\Projects\564\11222535\Digital_Design\Figures\11222535-RPT02-FIG02-Site_Layout.dwg
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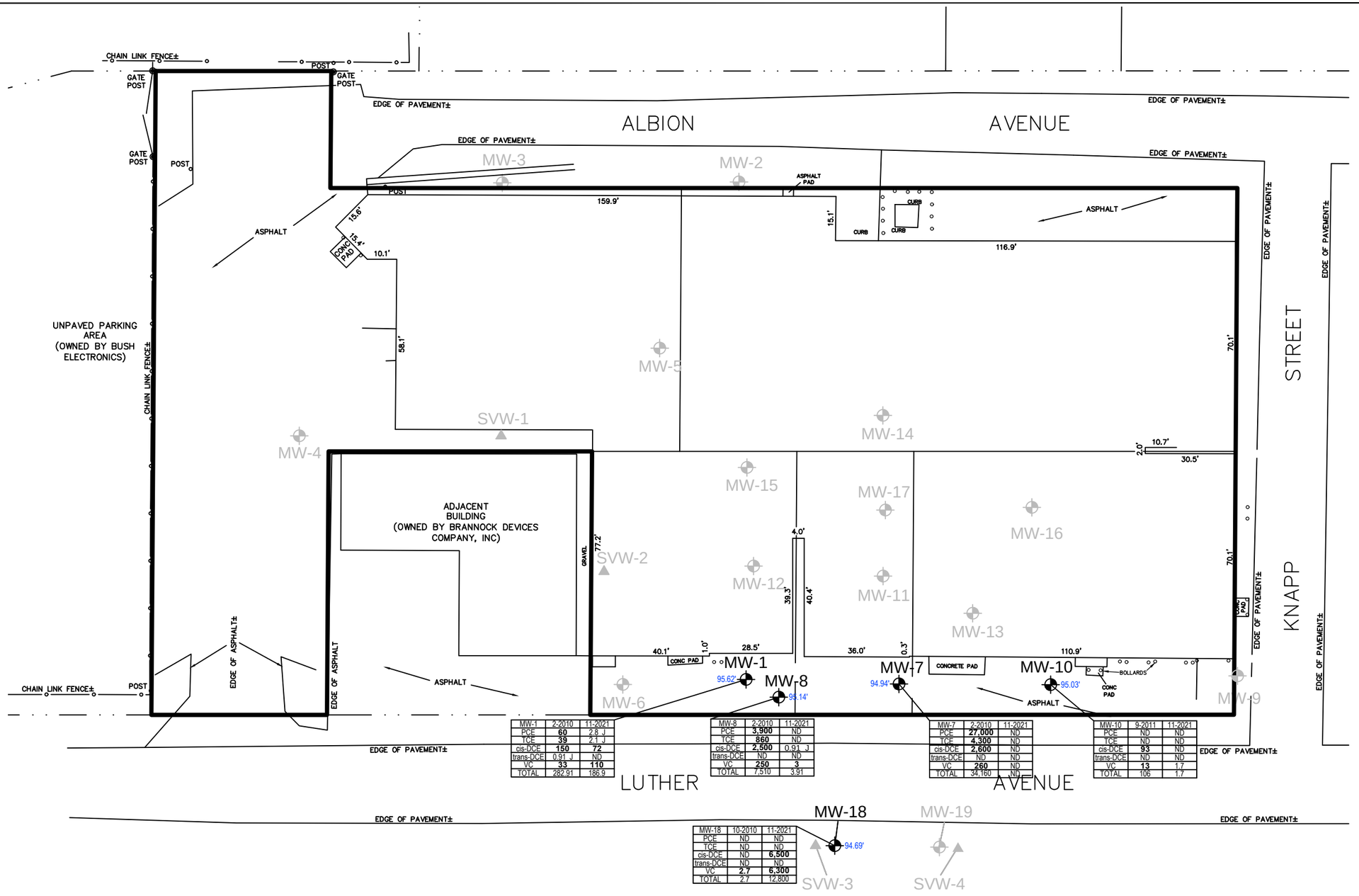

MW-1	2-2010	11-2021
PCE	**60**	2.8 J
TCE	**39**	2.1 J
cis-DCE	**150**	**72**
trans-DCE	0.91 J	ND
VC	**33**	**110**
TOTAL	282.91	186.9

MW-8	2-2010	11-2021
PCE	**3,900**	ND
TCE	**860**	ND
cis-DCE	**2,500**	0.91 J
trans-DCE	ND	ND
VC	**250**	**3**
TOTAL	7,510	3.91

MW-7	2-2010	11-2021
PCE	**27,000**	ND
TCE	**4,300**	ND
cis-DCE	**2,600**	ND
trans-DCE	ND	ND
VC	**260**	ND
TOTAL	34,160	ND

MW-10	9-2011	11-2021
PCE	ND	ND
TCE	ND	ND
cis-DCE	**93**	ND
trans-DCE	ND	ND
VC	**13**	1.7
TOTAL	106	1.7

MW-18	10-2010	11-2021
PCE	ND	ND
TCE	ND	ND
cis-DCE	ND	**6,500**
trans-DCE	ND	ND
VC	**2.7**	**6,300**
TOTAL	2.7	12,800

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, MARCH 2019, OR SEPTEMBER 2020 (SURVEYED)
- SVW-1 — SOIL VAPOR MONITORING WELL LOCATION AND ID DECOMMISSIONED DECEMBER 2016 OR SEPTEMBER 2020 (SURVEYED)
- BCP SITE BOUNDARY (APPROXIMATE)
- PROPERTY BOUNDARY (APPROXIMATE)
- 94.83' — GROUNDWATER ELEVATION (NOVEMBER 2021)

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

NOTES:
1. 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 2021 event (November 2021).
   - 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
2. REFER TO DATA TABLES IN PERIODIC REVIEW REPORT FOR COMPLETE SUMMARY OF GROUNDWATER SAMPLING RESULTS
3. GROUNDWATER ELEVATIONS AND CONTOURS BASED ON NOVEMBER 2021 MEASUREMENTS, WHICH IS THE LAST TIME ALL SITE MONITORING WELLS WERE MEASURED.
4. 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.

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

N

0 18 36 54 72'

SCALE 1"=36' AT ORIGINAL SIZE

GHD

SYRACUSE LABEL COMPANY, INC.
PERIODIC REVIEW REPORT FOR BCP SITE #C734118
MARCH 17, 2021 TO MARCH 17, 2022

GROUNDWATER MONITORING RESULTS AND ELEVATIONS

Project No. **11222535**
Date **04.2022**

FIGURE 3

Data Source

Filename: \\ghdnet\ghd\US\Syracuse\Projects\564\11222535\Digital_Design\Figures\11222535-RPT02-FIG03-GW_Results.dwg
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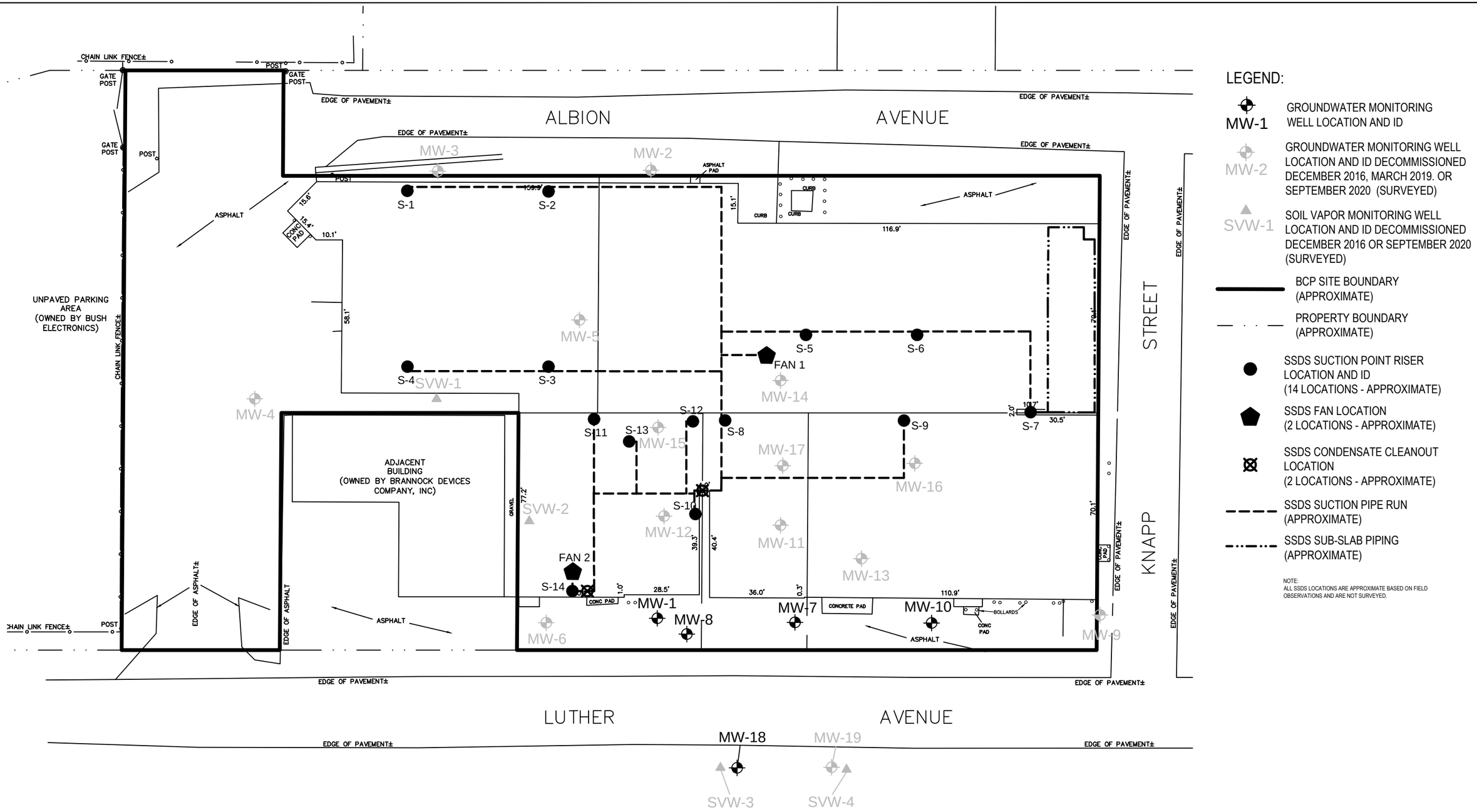

LEGEND:

- MW-1 — GROUNDWATER MONITORING WELL LOCATION AND ID
- MW-2 — GROUNDWATER MONITORING WELL LOCATION AND ID DECOMMISSIONED DECEMBER 2016, MARCH 2019. OR SEPTEMBER 2020 (SURVEYED)
- SVW-1 — SOIL VAPOR MONITORING WELL LOCATION AND ID DECOMMISSIONED DECEMBER 2016 OR SEPTEMBER 2020 (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.

N

0 18 36 54 72'

SCALE 1"=36' AT ORIGINAL SIZE

GHD

SYRACUSE LABEL COMPANY, INC.
PERIODIC REVIEW REPORT FOR BCP SITE #C734118
MARCH 17, 2021 TO MARCH 17, 2022

SUB-SLAB DEPRESSURIZATION SYSTEM LAYOUT

Project No. **11222535**
Date **04.2022**

FIGURE 4

Data Source

Filename: \\ghdnet\ghd\US\Syracuse\Projects\564\11222535\Digital_Design\Figures\11222535-RPT02-FIG04-SSDS_Layout.dwg
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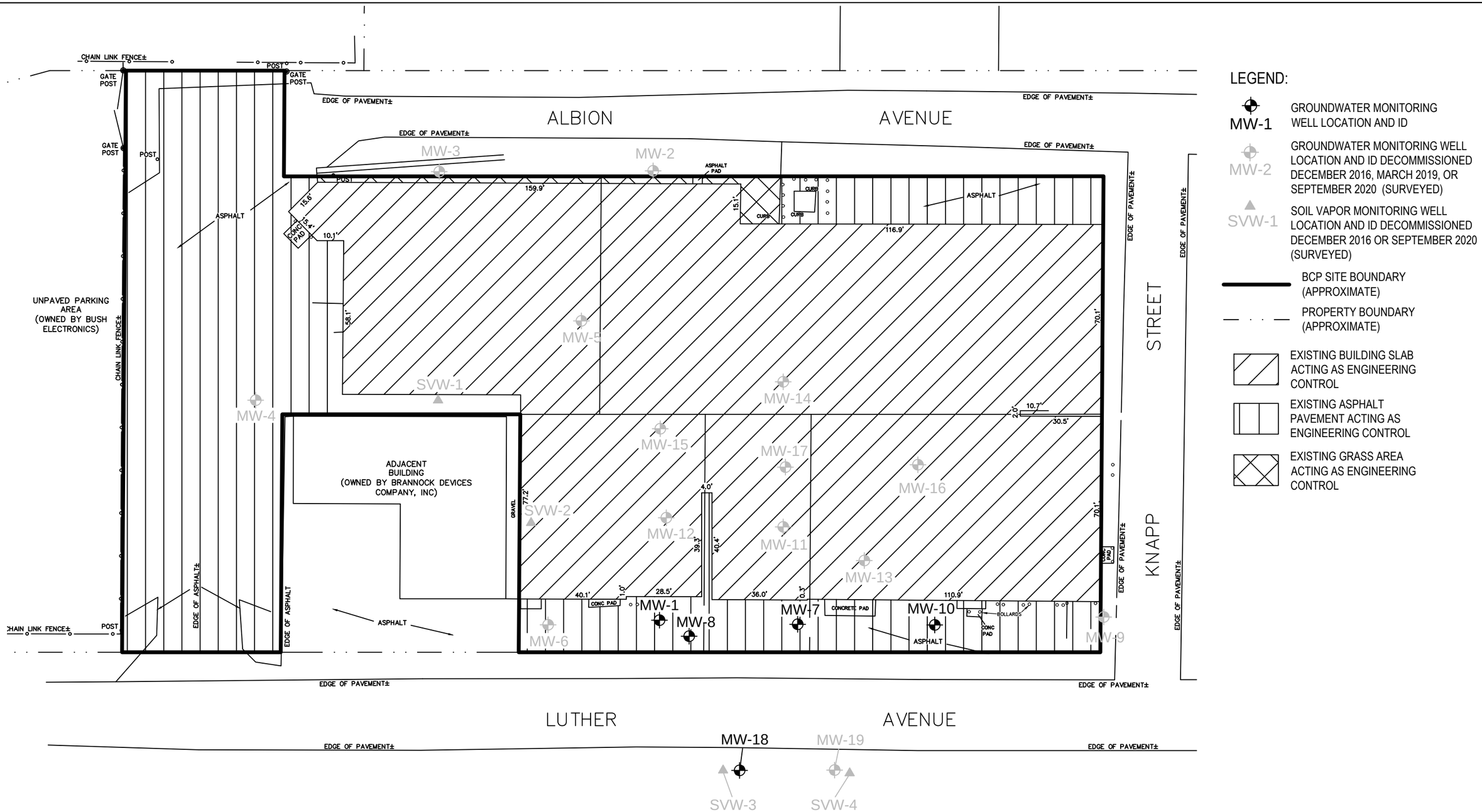

NOTES:
1. SITE FEATURES BASED ON SITE SURVEY BY IANUZI & ROMANS, P.C. MARCH 2010 AND NOVEMBER 2010.

N

0 18 36 54 72'

SCALE 1"=36' AT ORIGINAL SIZE

GHD

SYRACUSE LABEL COMPANY, INC.
PERIODIC REVIEW REPORT FOR BCP SITE #C734118
MARCH 17, 2021 TO MARCH 17, 2022

SOIL COVER ENGINEERING CONTROLS

Project No. **11222535**
Date **04.2022**

FIGURE 5

Data Source

Filename: \\ghdnet\ghd\US\Syracuse\Projects\564\11222535\Digital_Design\Figures\11222535-RPT02-FIG05-Soil_Cover_EC.dwg
Plot Date: 13 April 2022 10:47 AM

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**

Site No. C734118

Site Name 110 Luther Ave. Site

Site Address: 110 Luther Avenue Zip Code: 13088
City/Town: Liverpool
County: Onondaga
Site Acreage: 1.400

Reporting Period: March 17, 2021 to March 17, 2022

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

Box 2

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

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

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

Signature of Owner, Remedial Party or Designated Representative Date

Box 2A

	YES	NO
8. Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?	☐	X
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)	X	☐
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	Owner	Institutional Control
085-12-04.1	Box Capital, LLC	

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.

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).

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- 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;
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- 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.

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085-12-06.1 Box Capital, LLC

Ground Water Use Restriction

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

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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).

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- 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
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- 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

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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).

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085-12-08.0 Box Capital, LLC

IC/EC Plan

Landuse Restriction
Monitoring Plan
O&M Plan
Ground Water Use Restriction
Site Management Plan

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Box 4

Description of Engineering Controls

Parcel	Engineering Control
085-12-04.1	Vapor Mitigation Cover System
085-12-05.0	Cover System Vapor Mitigation
085-12-06.1	Vapor Mitigation Cover System
085-12-08.0	Cover System Vapor Mitigation
085-12-09.0	Vapor Mitigation Cover System

Box 5

Periodic Review Report (PRR) Certification Statements

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

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

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

YES	NO
X	☐

2. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

   (a) The 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
X	☐

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 (print name) at 200 Stewart Drive, North Syracuse, New York 13212 (print business address),

am certifying as Owner (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

4/28/22
Date

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 (print name) at GHD Consulting Services Inc. 5788 Widewaters Parkway, Syracuse, New York 13214 (print business address),

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

Signature of Professional Engineer, for the Owner or Remedial Party, Rendering Certification	Stamp (Required for PE)	4-28-2022 Date

Appendix B

Property Ownership Information for Adjoining Property

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

No Photo Available

		Status:	Active
		Roll Section:	Taxable
		Swis:	314889
		Tax Map ID #:	085.-12-10.0
		Property #:	
		Property Class:	710 - Manufacture
		Site:	COM 1
		In Ag. District:	No
		Site Property Class:	710 - Manufacture
		Zoning Code:	06
		Neighborhood Code:	48005
Total Acreage/Size:	90 x 90	**School District:**	Liverpool
Land Assessment:	2021 - $18,000	**Total Assessment:**	2021 - $150,000
Full Market Value:	2021 - $150,000		
Equalization Rate:	----	**Property Desc:**	Buckley Gardens Lts 434 435 & 436
Deed Book:	4013	**Deed Page:**	42
Grid East:	610957	**Grid North:**	1125115

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

Sewer Type:	Comm/public	**Water Supply:**	Comm/public
Utilities:	Gas & elec		

Inventory

Overall Eff Year Built:	0	**Overall Condition:**	Normal
Overall Grade:	Economy	**Overall Desirability:**	3

Buildings

AC%	Sprinkler%	Alarm%	Elevators	Basement Type	Year Built	Eff Year Built	Condition	Quality	Gross Floor Area (sqft)	Stories	Num Indent Bldgs
67	0	0	0		1960		Normal	Average	4113	1	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 × 4	Average	Fair	1970

Land Types

Type	Size
Primary	90 × 90

Special Districts for 2021

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

Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date: 3-31-21

Insepctors Name: PAUL MUMFORD

Company: SYRLSP

Inspector Initials:

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	4.0
S-6	3.5
S-7	3.0
S-8	4.5
S-9	2.0
S-10	3.5
S-11	3.0
S-12	3.0
S-13	3.5
S-14	3.0

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

II. Fan Inspection

1. Operational?	Y	✓	N	
2. Fan/Controls Clear of obstructions?	Y	✓	N	
3. Rapair needs?	Y		N	✓

A. Observations/comments:

DRUM FULL, REMOVE SOON

488-3161

MARK OR BEN

Attach photographs as appropriate

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

Additional Comments:

TRAPS 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: 4-29-21

Insepctors Name: PAUL MUMFORD

Company: SYALSP

Inspector Initials: PM

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.5
S-2	3.5
S-3	6.0
S-4	5.0
S-5	4.0
S-6	3.5
S-7	2.5
S-8	5.0
S-9	2.0
S-10	3.0
S-11	2.5
S-12	2.5
S-13	3.0
S-14	2.5

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

II. Fan Inspection

1. Operational?	Y	✓	N	
2. Fan/Controls Clear of obstructions?	Y	✓	N	
3. Rapair needs?	Y		N	✓

A. Observations/comments:

Attach photographs as appropriate

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

Additional Comments:

TRAPS 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: 5/28/21

Insepctors Name: PAUL MUMFORD

Company: SYRLSP

Inspector Initials: pm

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.25
S-2	3.5
S-3	6.0
S-4	5.25
S-5	3.75
S-6	3.5
S-7	3.0
S-8	5.0
S-9	2.0
S-10	3.5
S-11	2.75
S-12	3.0
S-13	3.5
S-14	2.75

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

II. Fan Inspection

1. Operational?	Y	✓	N	
2. Fan/Controls Clear of obstructions?	Y	✓	N	
3. Rapair needs?	Y		N	✓

A. Observations/comments:

Attach photographs as appropriate

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

Additional Comments:

TRAPS 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: 6-29-21

Insepctors Name: PAUL MUMFORD

Company: SYALSP

Inspector Initials: PM

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.5
S-2	4.0
S-3	6.0
S-4	5.0
S-5	4.0
S-6	3.5
S-7	3.0
S-8	5.0
S-9	2.0
S-10	4.0
S-11	3.0
S-12	3.0
S-13	3.5
S-14	3.0

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

II. Fan Inspection

1. Operational?	Y	✓	N	
2. Fan/Controls Clear of obstructions?	Y	✓	N	
3. Rapair needs?	Y		N	✓

A. Observations/comments:

Attach photographs as appropriate

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

Additional Comments:

Report all maintenance/repair needs immediately to building facility manager

Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date: 7-29-21

Insepctors Name: PAUL MUMFORD

Company: SYRCSP

Inspector Initials: PM

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.5
S-2	3.5
S-3	6.0
S-4	5.0
S-5	4.0
S-6	3.5
S-7	3.0
S-8	4.5
S-9	2.0
S-10	3.5
S-11	3.0
S-12	3.0
S-13	3.5
S-14	3.0

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

II. Fan Inspection

1. Operational?	Y	✓	N	
2. Fan/Controls Clear of obstructions?	Y	✓	N	
3. Rapair needs?	Y		N	✓

A. Observations/comments:

Attach photographs as appropriate

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

Additional Comments:

TRAPS 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: 8-30-21

Insepctors Name: PAUL MUMFORD

Company: SYRLSP

Inspector Initials: PM

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.5
S-2	4.0
S-3	6.0
S-4	5.0
S-5	4.0
S-6	3.5
S-7	3.0
S-8	5.0
S-9	3.0
S-10	3.5
S-11	3.0
S-12	3.0
S-13	3.5
S-14	3.5

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

II. Fan Inspection

1. Operational?	Y	✓	N	
2. Fan/Controls Clear of obstructions?	Y	✓	N	
3. Rapair needs?	Y		N	✓

A. Observations/comments:

Attach photographs as appropriate

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

Additional Comments:

TRAPS 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: 9-30-21

Insepctors Name: PAUL MUMFORD

Company: SYRLSP

Inspector Initials: PM

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.5
S-2	3.5
S-3	6.0
S-4	5.0
S-5	4.0
S-6	3.5
S-7	3.0
S-8	0
S-9	0
S-10	0
S-11	0
S-12	0
S-13	0
S-14	0

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

II. Fan Inspection

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

A. Observations/comments:

Attach photographs as appropriate

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

SEE ATTACHED WAITE UP.

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

Additional Comments:

TRAPS ARE DRY

Report all maintenance/repair needs immediately to building facility manager

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10/20/21

RE: Monthly SSDS Walk Thru

While checking pressure readings for the month of September it was observed that the floor penetration S-11 was sheared off from a pallet running into it. See images below. The opening in the floor is covered by the pallet and you can see the white ring of broken PVC at the bottom of the pipe.

Brian (Unifirst Maintenance) was notified and he completed the necessary repair 10/13/21. See below pictures of repair and subsequent pressure gauge reading.

I returned 10/20/21 for inspection and monitoring of the gauges. See report on October for pressure readings.

Sincerely,

Paul Mumford
Process Engineer

Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date: 10-20-21

Insepctors Name: PAUL MUMFORD

Company: SYRLSA

Inspector Initials:

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	5.0
S-2	4.0
S-3	6.5
S-4	5.5
S-5	4.5
S-6	4.0
S-7	3.0
S-8	5.0
S-9	3.5
S-10	4.0
S-11	3.5
S-12	3.5
S-13	4.0
S-14	4.0

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

II. Fan Inspection

1. Operational?	Y	✓	N	
2. Fan/Controls Clear of obstructions?	Y	✓	N	
3. Rapair needs?	Y		N	✓

A. Observations/comments:

Attach photographs as appropriate

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

Additional Comments:

TRAPS 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: 11-30-21

Insepctors Name: PAUL MUMFORD

Company: SYRLSP

Inspector Initials:

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.0
S-2	4.0
S-3	6.0
S-4	5.5
S-5	4.0
S-6	3.75
S-7	3.0
S-8	5.0
S-9	2.0
S-10	3.5
S-11	3.0
S-12	3.0
S-13	3.5
S-14	3.0

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

II. Fan Inspection

1. Operational?	Y	✓	N	
2. Fan/Controls Clear of obstructions?	Y	✓	N	
3. Rapair needs?	Y		N	✓

A. Observations/comments:

Attach photographs as appropriate

B. Actions taken:

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

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)

NEW GUARD @ SW #11 POINT.

Additional Comments:

TRAPS 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: 12-30-21

Insepctors Name: PAUL MUMFORD

Company: SYRLSP

Inspector Initials:

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.0
S-2	3.5
S-3	6.8
S-4	5.5
S-5	4.0
S-6	3.5
S-7	3.0
S-8	5.8
S-9	2.0
S-10	3.5
S-11	3.0
S-12	3.0
S-13	3.5
S-14	3.5

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

II. Fan Inspection

1. Operational?	Y	✓	N	
2. Fan/Controls Clear of obstructions?	Y	✓	N	
3. Rapair needs?	Y		N	✓

A. Observations/comments:

Attach photographs as appropriate

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

Additional Comments:

TRAPS 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: 1-31-22

Insepctors Name: PAUL MUMFORD

Company: SYRACSP

Inspector Initials: PM

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.5
S-2	4.0
S-3	6.0
S-4	5.0
S-5	3.5
S-6	3.5
S-7	2.5
S-8	5.0
S-9	2.0
S-10	2.5
S-11	2.5
S-12	2.5
S-13	3.0
S-14	2.5

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

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

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

Additional Comments:

TRAPS 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: 2-28-22

Insepctors Name: PAUL MUMFORD

Company: STACSP

Inspector Initials:

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.5
S-2	4.0
S-3	6.0
S-4	5.0
S-5	4.0
S-6	4.0
S-7	3.0
S-8	5.0
S-9	2.0
S-10	3.0
S-11	3.0
S-12	3.0
S-13	3.5
S-14	3.0

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

II. Fan Inspection

1. Operational?	Y	✓	N	
2. Fan/Controls Clear of obstructions?	Y	✓	N	
3. Rapair needs?	Y		N	✓

A. Observations/comments:

Attach photographs as appropriate

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

Additional Comments:

TRAPS 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: 3-29-22

Insepctors Name: PAUL MUMFORD

Company: SPARLSP

Inspector Initials: PM

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)
S-1	4.0
S-2	3.5
S-3	6.0
S-4	5.0
S-5	4.0
S-6	3.5
S-7	3.0
S-8	5.0
S-9	2.0
S-10	3.5
S-11	3.0
S-12	3.0
S-13	MISSING.
S-14	2.5

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

II. Fan Inspection

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

A. Observations/comments:

Attach photographs as appropriate

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 X N ___

If so, indicate locations, and actions taken:

#13 MISSING REPLACEMENT ON ORDER. WILL BE INSTALLED THIS WEEK.

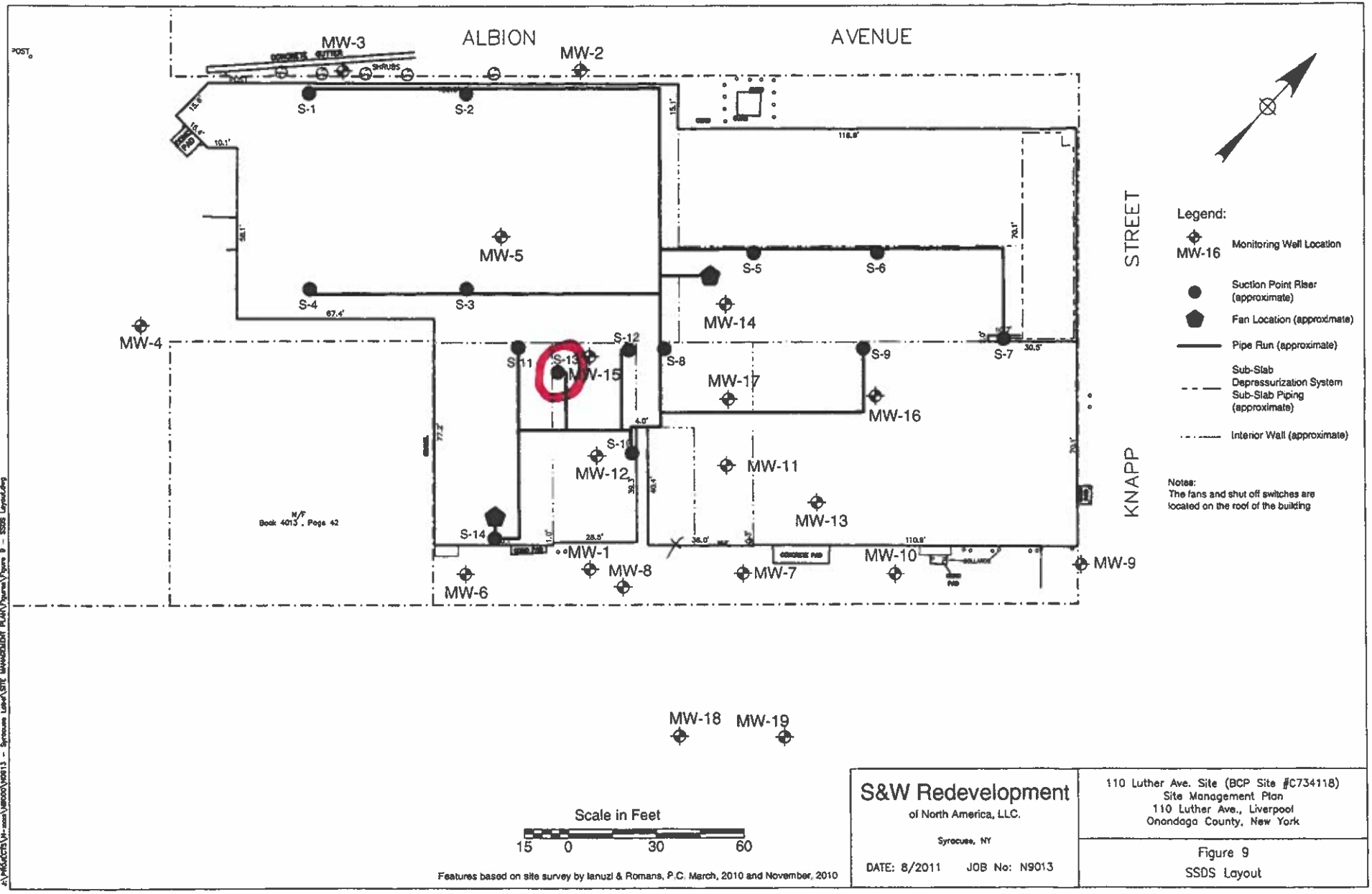
IV. Building Modifications: Have building modifications been made that could affect the operation of the SSD System? (Describe)

NONE

Additional Comments:

TRAPS DRY

Report all maintenance/repair needs immediately to building facility manager



S&W Redevelopment
of North America, LLC.
Syracuse, NY
DATE: 8/2011 JOB No: N9013

110 Luther Ave. Site (BCP Site #C734118)
Site Management Plan
110 Luther Ave., Liverpool
Onondaga County, New York

Figure 9
SSDS Layout

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: 3/16/22 9:00 - 10:30 AM

Inspected By: DJVanetti

		Y or N	Comments or Problem Identified/Action Taken
1.	**Condition of pavement**: Are there areas of pavement where sub-soil is exposed?	N	Surface cracks in pavement. subsidence on north side of bldg in parking area near stormwater catch basins. (Photos)
2.	**Conditions of concrete slab:** Is the concrete slab of the manufacturing facility intact? Are there cracks or gaps through which underlying soil is exposed?	Y N	slab in warehouse - cracks sealed.
3.	**Sediment/Erosion Control**: Are erosion/storm water control devices in place in accordance with Stormwater Pollution Prevention Plan?	NA	
4.	**Excavation/Backfill**: Has Excavation been completed in accordance with the site Excavation Work Plan?	NA	
5.	**Stockpiled Materials**: Are temporary soil stockpiles or construction materials protected from erosion?	NA	
6.	**Dust Control**: Have dust control measures been implemented as needed during the conduct of construction work?	NA	
7.	**CAMP:** Has Community Air Monitoring been conducted in accordance with the CAMP?	NA	
8.	**SSDS:** Has an inspection of the SSDS been completed?	Y	

Landscape areas at south entrance off Luther Ave have nothing of soil cover - recommend regrade and reseed.
Landscape area south west corner of paved area has nothing of soil cover - recommend regrade and reseed.

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

Sub-Slab Depressurization System

Inspection Checklist

Syracuse Label, 110 Luther Avenue, Liverpool, NY

Date: 3/16/22

Insepctors Name: DJ Vanetti

Company: GHD

I. Pressure Readings

Suction Riser Identification	Pressure Reading (inWC)	Baseline Pressure (in WC)
S-1	3.8 ✓	3.0
S-2	3.5 ✓	3.2
S-3	6.2 ✓	5.5
S-4	5.6 ✓	5.7
S-5	3.9 ✓	3.5
S-6	3.5 ✓	3.0
S-7	2.5 ✓	2.1
S-8	4.8 ✓	2.0
S-9	2.1 ✓	4.5
S-10	3.2 ✓	2.2
S-11	3.1 ✓	2.0
S-12	3.2 ✓	2.1
S-13	3.5 ✓	2.1
S-14	3.2 ✓	2.1

Notes:

Locations of suction risers can be found on attached Figure.

System details are included in Appendix B.

II. Fan Inspection

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

A. Observations/comments:

Attach photographs as appropriate

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 observed. New overhead door on Luther Ave side provides better seal.

Additional Comments:

S-14 Recommend bollards to protect riser.
S-8 Recommend bollards to protect riser

Report all maintenance/repair needs immediately to building facility manager

Photo 01 - View of minor soil rutting near western corner of building along Albion Avenue (not on the BCP Site). Recommended to be repaired when weather conditions allow.

Photo 02 - View of minor soil rutting on the southwest side of the Site near end of Albion Avenue. Recommended to be repaired when weather conditions allow.

Photo 03 – View of southwestern portion of Site from driveway and Luther Avenue intersection.

Photo 04 – View of southern portion of Site between Site building on left and Brannock Devices building on right.

Photo 05 – View of drum storage on adjoining property operated by Brannock Devices.

Photo 06 – View of on-going construction being performed by others on adjoining property across Luther Avenue.

Photo 07 – View of cracked and deteriorated asphalt pavement around stormwater catch basin near Knapp Street and Albion Avenue intersection.

Photo 08 – View of area of subsidence in asphalt pavement on northern side of Site building.

Photo 09 – View of SSDS Fan 1 and pipe supports.

Photo 10 – Typical view of building interior space currently leased by UniFirst.

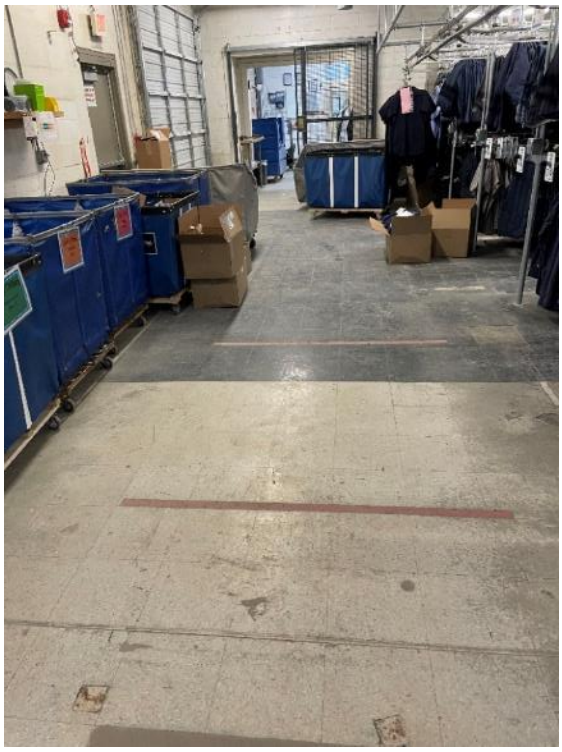


Photo 11 – Typical view of building interior space currently leased by UniFirst.

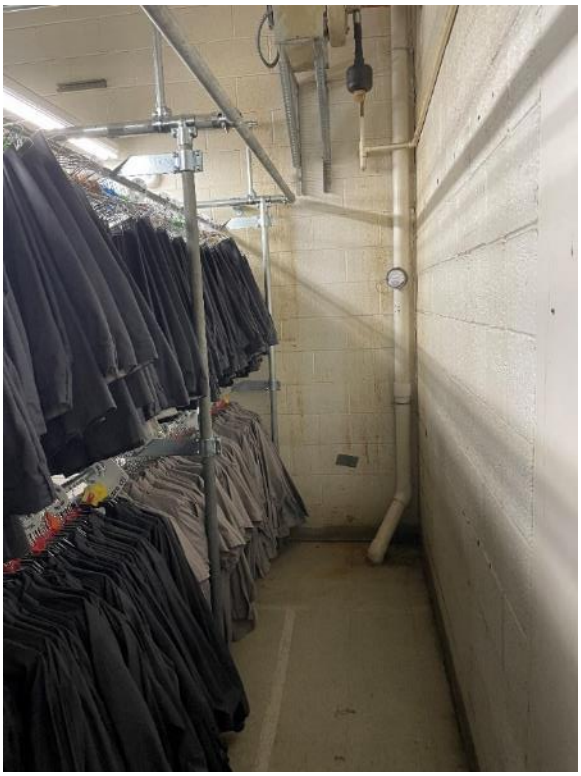


Photo 12 – View of typical SSDS suction point riser and magnehelic gauge.

Photo 13 – View of SSDS riser at suction point #8, bollard installation recommended for protection.

Photo 14 – View of SSDS riser at suction point #14, bollard installation recommended for protection.

Photo 15 – View of SSDS Fan 2 on southern roof of building near Luther Avenue.

Photo 16 – View of alleyway between building sections along Luther Avenue with previous vegetation removed.

Photo 17 – View of sealed surface cracks in interior concrete floor slab located in main warehouse portion of building.

Photo 18 – View of sealed surface cracks in interior concrete floor slab located in main warehouse portion of building.

Photo 19 – View of bollard installed at S-11 to protect the suction riser from impact damage.

Photo 20 – View of new overhead door on Luther Ave side of the building which provides improved seal.

NON-HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Waste Tracking Number
NYD042350751	1	800-535-5053	38262

GENERATOR

5. Generator's Name and Mailing Address
Syracuse Label & Surround Printing
200 Stewart Drive
North Syracuse, NY 13212
Generator's Phone: 315-422-1037

Generator's Site Address (if different than mailing address)
Syracuse Label Company Inc.
110 Luther Ave
Liverpool, NY 13088

6. Transporter 1 Company Name: Environmental Service Group, Inc 716.695.6720 — U.S. EPA ID Number: NYD986903904

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address
American Recycling Company
177 Wales Avenue
Tonawanda, NY 14150
Facility's Phone: 716.695.6720 — U.S. EPA ID Number: NYR000030809

	9. Waste Shipping Name and Description	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	
	1. Non RCRA Non DOT Regulated , (Water)	00001	DM0055 C			
	2.					
	3.					
	4.					

13. Special Handling Instructions and Additional Information

ERG: Approval #:
1 - 1 - B-6623IN
2 - 2 -
3 - 3 -
4 - 4 -

Handling Codes:
1 - None
2 -
3 -
4 -

24 Hour Emergency Contact: INFOTRAC (Caller Must ID ESG)

14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offeror's Printed/Typed Name: Mark Howard — Signature: Mark Howard — Month: 04 Day: 20 Year: 21

INT'L

15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter Signature (for exports only): Date leaving U.S.:

TRANSPORTER

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Michael W Peterson — Signature — Month: 04 Day: 20 Year: 21

Transporter 2 Printed/Typed Name — Signature — Month — Day — Year

DESIGNATED FACILITY

17. Discrepancy

17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

17c. Signature of Alternate Facility (or Generator) — Month — Day — Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name: Justin Rainville — Signature — Month: 04 Day: 20 Year: 21

DESIGNATED FACILITY TO GENERATOR

AMERICAN RECYCLERS COMPANY

177 WALES AVE
TONAWANDA, NY 14150
NYR000030809

CERTIFICATE OF DISPOSAL

Syracuse Label & Surrounding Printing
110 Luther Avenue
Liverpool, NY 13088

SHIPPING PAPERS NUMBER:

TYPE: **Well Water** **QUANITY:** **1 Drum** **APPROVAL NUMBER:** **B-6623IN**

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

SIGNED: _____
Justin Rainville

DATED: 3/29/22

Appendix D

Approval Notifications for NYSDEC EQuIS Database Submittals

Natasha Duran

From: dec.sm.NYENVDATA <NYENVDATA@dec.ny.gov>
Sent: Friday, July 9, 2021 1:39 PM
To: Ian McNamara
Cc: Mannes, Christopher (DEC)
Subject: RE: EDDs for the 110 Luther Avenue BCP Site #C734118 - Spring 2021 GW Monitoring Event

Ian,

Thank you for your EDD submission. NYSDEC has successfully uploaded the data from the EDDs "20210609 1335.C734118.NYSDEC_MERGE" and "20210609 1339.C734118.NYSDEC_MERGE" to 110 Luther Ave. Site in the NYSDEC database and the data is available for use within the system.

Aaron
(he/him/his)
NYSDEC EIMS Team

NEW YORK STATE | Department of Environmental Conservation

From: Ian McNamara <Ian.McNamara@ghd.com>
Sent: Wednesday, June 09, 2021 2:15 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 - Spring 2021 GW Monitoring Event

Hello,

Attached are 2 EDDs related to spring 2021 groundwater monitoring that was conducted at the above referenced site on May 20, 2021. 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
Geologist

GHD
Proudly employee owned | ghd.com
5788 Widewaters Pkwy Syracuse New York 13214 USA
D 315 802 0312 **M** 315 368 8432 **E** ian.mcnamara@ghd.com

Natasha Duran

From: dec.sm.NYENVDATA <NYENVDATA@dec.ny.gov>
Sent: Friday, February 25, 2022 2:29 PM
To: Ian McNamara
Cc: Mannes, Christopher (DEC)
Subject: RE: EDDs for the 110 Luther Avenue BCP Site #C734118 - Fall 2021 GW Monitoring Event
Attachments: 20220113 1443.C734118.NYSDEC_MERGE.Errors.htm

Ian,

Thank you for your EDD submission. NYSDEC has successfully uploaded the data from the EDD "20220113 1442.C734118.NYSDEC_MERGE" to 110 Luther Ave. Site in the NYSDEC database and the data is available for use within the system.

Our attempt to upload the data from 20220113 1443.C734118.NYSDEC_MERGE was not successful (see attached error log). The referenced location code MW18 is missing from our EQuIS database. I would hazard a guess that you meant to reference the location MW-18, but it's not my place to say whether the distinct location MW18 doesn't exist on your end, yet to be submitted.

Either submit the referenced location MW18, or submit a revised copy of the 1443 dataset with the location reference corrected to MW-18.

By the way, the sample code MW18-20211119 is also distinct from the sample code MW-18-20211119 from the FieldResults_v4 section of your 1442 EDD. Unless you revise the 1443 EDD's sample code to match the sample code from the field analysis we successfully uploaded to the database, reports generated from the data are going to make it look like two distinct samples were collected from the same location if you only revise the sys_loc_code for the MW18-20211119 sample, and don't revise the sys_sample_code and the child records that reference MW18-20211119.

It's your place to say whether there were two locations and/or two distinct sampling events, but your choices in the Sample_v4.sys_sample_code, sys_loc_code, TestResultQC_v4.sys_sample_code, and Batch_v4.sys_sample_code will determine what story the data tells when it's uploaded to NYSDEC's EQuIS database.

Please do not hesitate to contact us with any questions. Also, for future reference, here is the link for the EDD Manual: http://www.dec.ny.gov/docs/remediation_hudson_pdf/eddmanual.pdf, and the link for the main EDD instruction page: http://www.dec.ny.gov/chemical/62440.html.

Thank you,
Aaron
NYSDEC EIMS Team

NEW YORK STATE | Department of Environmental Conservation

From: Ian McNamara <Ian.McNamara@ghd.com>
Sent: Monday, January 17, 2022 9:14 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 - Fall 2021 GW Monitoring Event

Hello,

Attached are 2 EDDs related to fall 2021 groundwater monitoring that was conducted at the above referenced site on November 19, 2021. 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 (he/him)
Geologist

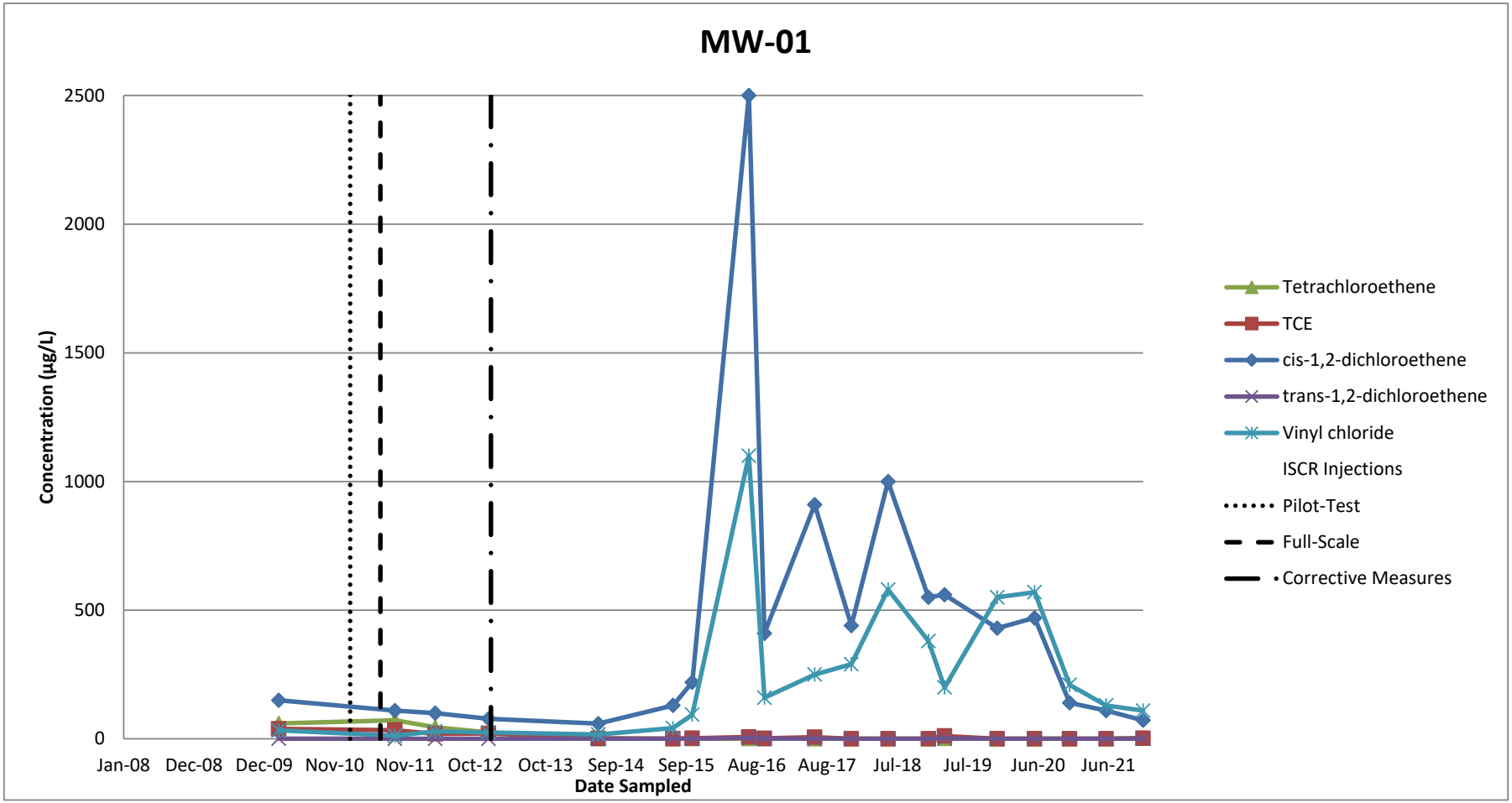
GHD
Proudly employee-owned | ghd.com
5788 Widewaters Parkway Syracuse New York 13214 USA
D 315 802 0312 | **M** 315 368 8432 | **E** ian.mcnamara@ghd.com

Appendix E

Time Series Plots

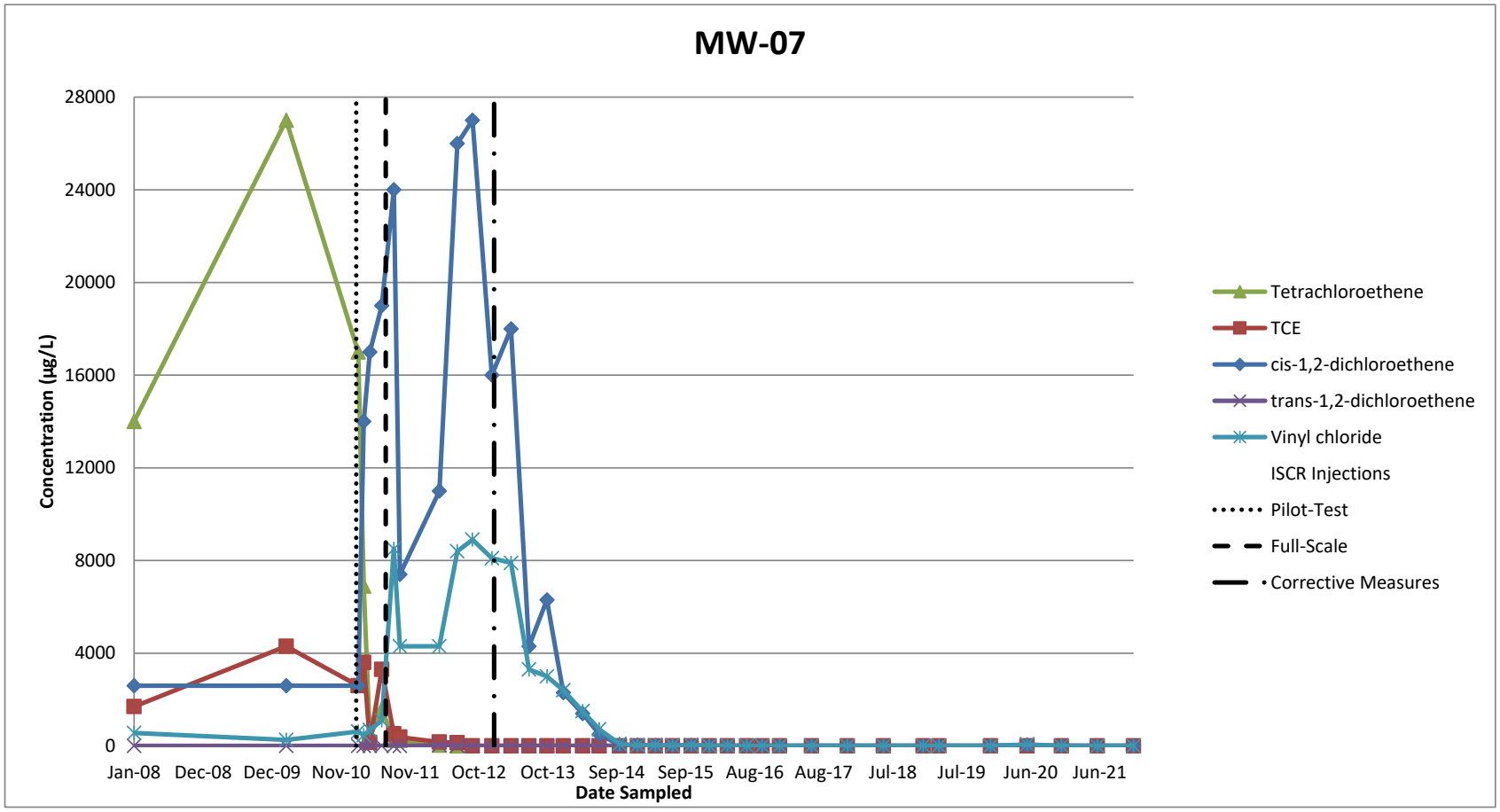
Appendix E
Time Series Plots
Chlorinated VOCs of Concern

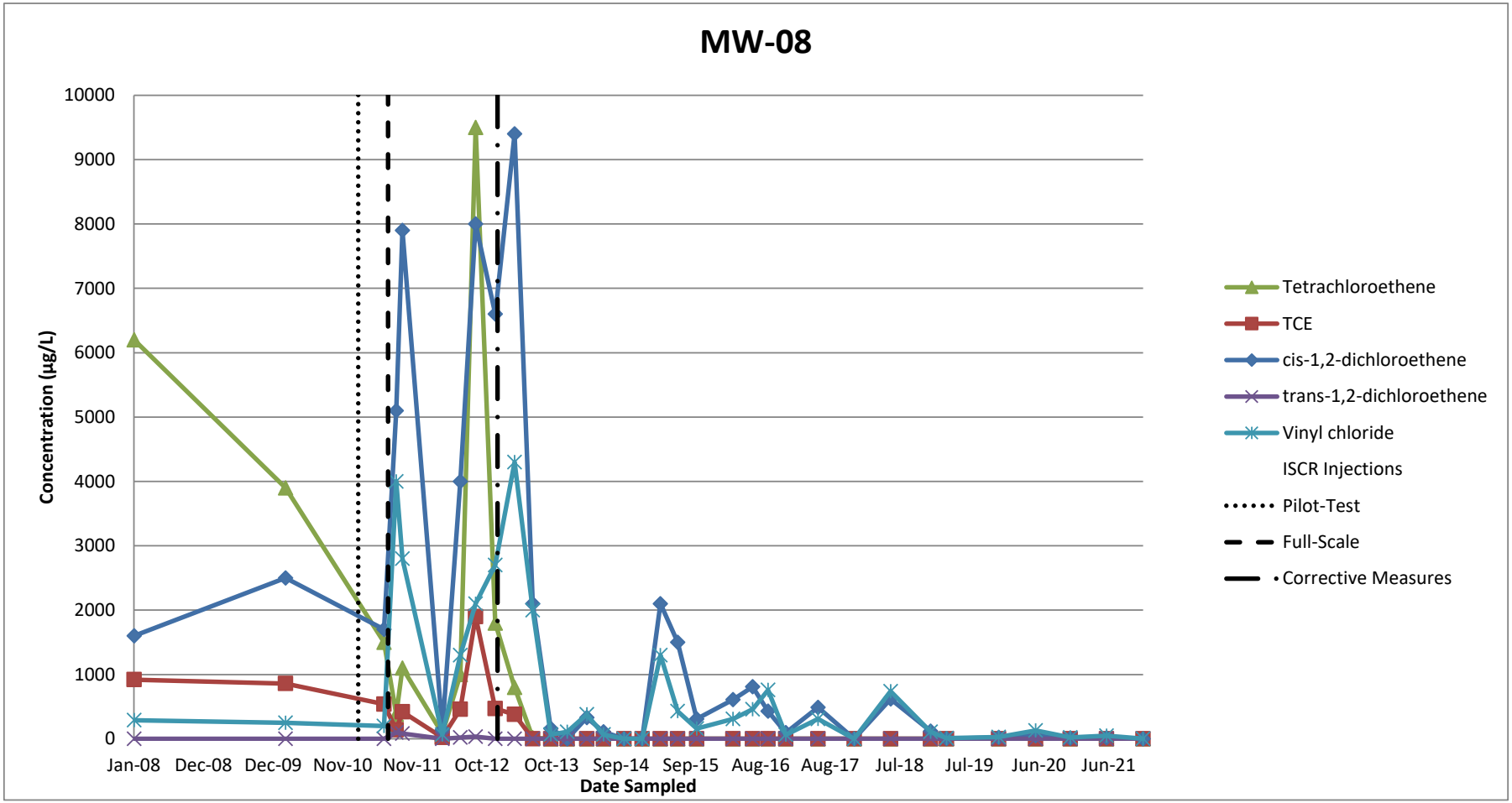
Syracuse Label Company, Inc.
110 Luther Avenue BCP Site
Site #C734118



Appendix E
Time Series Plots
Chlorinated VOCs of Concern

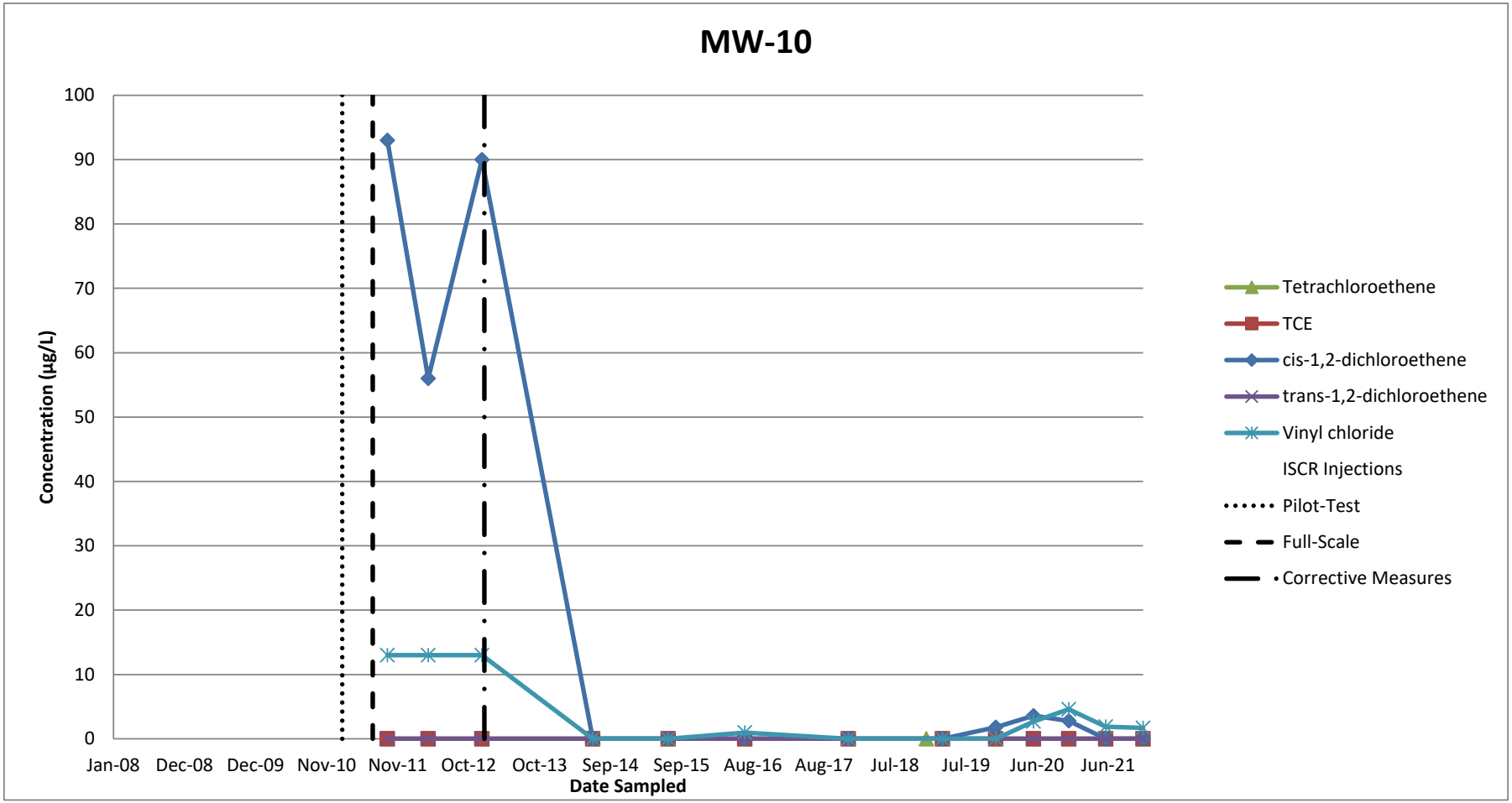
Syracuse Label Company, Inc.
110 Luther Avenue BCP Site
Site #C734118

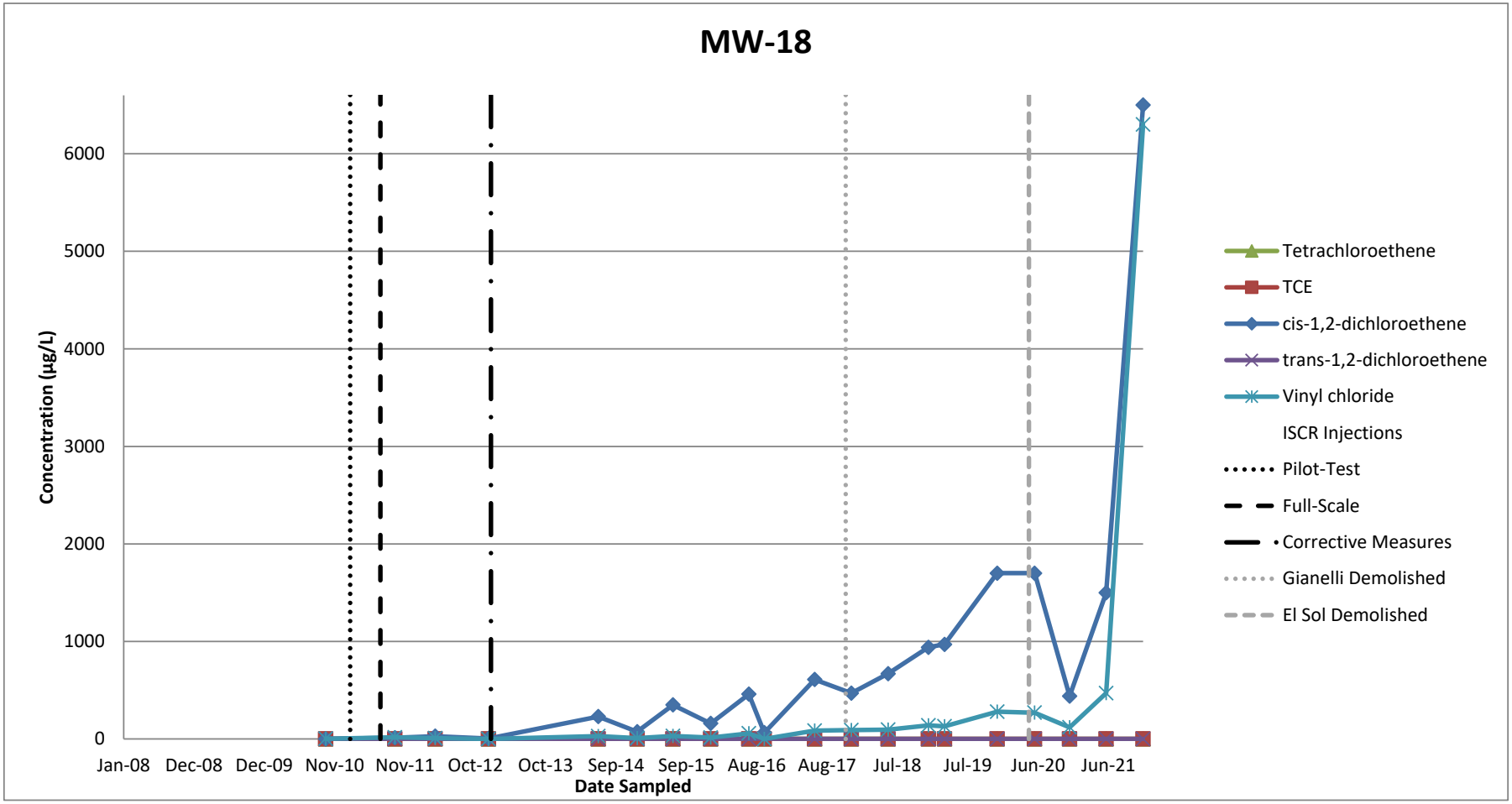



MW-08
Concentration (µg/L)
10000
9000
8000
7000
6000
5000
4000
3000
2000
1000
0
Jan-08
Dec-08
Dec-09
Nov-10
Nov-11
Oct-12
Oct-13
Sep-14
Sep-15
Aug-16
Aug-17
Jul-18
Jul-19
Jun-20
Jun-21
Date Sampled
Tetrachloroethene
TCE
cis-1,2-dichloroethene
trans-1,2-dichloroethene
Vinyl chloride
ISCR Injections
Pilot-Test
Full-Scale
Corrective Measures

Appendix E
Time Series Plots
Chlorinated VOCs of Concern

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




MW-18
Concentration (µg/L)
6000
5000
4000
3000
2000
1000
0
Jan-08
Dec-08
Dec-09
Nov-10
Nov-11
Oct-12
Oct-13
Sep-14
Sep-15
Aug-16
Aug-17
Jul-18
Jul-19
Jun-20
Jun-21
Date Sampled
Tetrachloroethene
TCE
cis-1,2-dichloroethene
trans-1,2-dichloroethene
Vinyl chloride
ISCR Injections
Pilot-Test
Full-Scale
Corrective Measures
Gianelli Demolished
El Sol Demolished