

# Periodic Review Report

June 1, 2017 to May 31, 2020

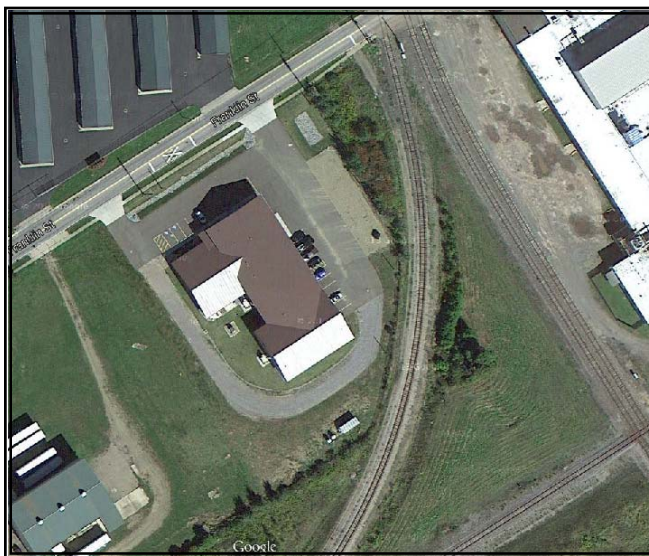
Scott Rotary Seals Site  
BCP Site No. 905036  
Olean, New York

May 2020

0189-020-001

Prepared For:

DST Properties NY, LLC



Prepared By:



2558 Hamburg Turnpike, Buffalo, New York | phone: (716) 856-0599 | fax: (716) 856-0583

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# PERIODIC REVIEW REPORT

**SCOTT ROTARY SEALS SITE  
(BCP SITE NO. C905036)**

**OLEAN, NEW YORK**

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May 2020

0189-020-001

Prepared for:

**DST Properties NY, LLC**

Prepared By:



Benchmark Environmental Engineering & Science, PLLC  
2558 Hamburg Turnpike, Suite 300  
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In Association With:



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# PERIODIC REVIEW REPORT

## Scott Rotary Seals Site

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# PERIODIC REVIEW REPORT

## Scott Rotary Seals Site

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## 1.0 INTRODUCTION

Benchmark Environmental Engineering & Science, PLLC in association with TurnKey Environmental Restoration, LLC (Benchmark-TurnKey) has prepared this Periodic Review Report (PRR), on behalf of DST Properties NY, LLC (DST), to summarize the post-remedial status of New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) Site No. C905036, located in Olean, Cattaraugus County, New York (see Figure 1), commonly referred to as the Scott Rotary Seals Site.

This PRR has been prepared for the Scott Rotary Seals Site in accordance with NYSDEC DER-10/*Technical Guidance for Site Investigation and Remediation* (May 3, 2010). The NYSDEC's Institutional and Engineering Controls (IC/EC) Certification Form has been completed for the Site (see Appendix A).

This PRR and associated inspection form have been completed for the post-remedial activities at the Site for the reporting period June 1, 2017 to May 31, 2020.

### 1.1 Site Description and Background

The Scott Rotary Seals Site, identified as SBL 94.040-1-29.02, is bounded by Franklin Street to the north; railroad tracks to the south and east; and commercial and former industrial properties to the west. The Site was redeveloped as an approximately 15,000-square foot facility for the manufacture of rotating unions and rotary timing valves along with commercial office space in Olean, New York. The Site was formerly a portion of a larger refinery and petroleum bulk storage facility commonly known as the former Socony-Vacuum facility situated in a heavily industrialized area of Olean. Figure 2 is an aerial view of the Site prior to remediation and redevelopment (April 2007). Figure 3 is an aerial view of the Site following remediation and redevelopment (August 2016).

Grossly contaminated petroleum soil (GCPS) was observed site-wide during a Phase II Investigation completed by TurnKey in 2009. The investigation also identified the presence of volatile organic compounds (VOC) tentatively identified compounds (TICs) and semi-volatile organic compounds (SVOC) TICs in soil, and sec-butylbenzene and phenanthrene in groundwater above NYSDEC Class GA groundwater quality standards (GWQS). Groundwater was also impacted by light non-aqueous phase liquids (LNAPL) on at least one occasion in monitoring wells MW-2, MW-4, and MW-6. It was concluded that,

based on visual/olfactory observations, photoionization detector (PID) measurements, and analytical results, significant site-wide petroleum-VOC and -SVOC impacts were evident, with GCPS present in some areas, and that the confirmed presence of contamination in Site groundwater and soil complicated the planned use of the property.

## 1.2 Remedial History

After acceptance into the New York State BCP in March 2010, an Interim Remedial Measures (IRM) Work Plan was prepared and subsequently approved by the NYSDEC. IRM activities were completed between March and May 2011 to address the removal of abandoned underground piping (and the contents thereof) and removal of four soil/fill/debris piles. A Remedial Action Work Plan (RAWP) was prepared to address the residual soil and groundwater remediation, submitted by DST, and approved by the NYSDEC. The remedial activities included:

### Interim Remedial Measures

- Removal, cleaning, and recycling of historic piping; collection of solid and liquid pipe contents; and off-site treatment/disposal of pipe contents.
- Excavation and off-site disposal of soil/fill/debris piles.

### Remedial Actions

- Removal of shallow GCPS.
- Extraction and treatment of soil/gas using a soil vapor extraction (SVE) system consisting of nine extraction wells and treatment of the recovered gas with carbon prior to discharge to the atmosphere. Carbon usage was suspended as agreed upon with the NYSDEC (refer to Section 1.3 for further detail).
- Implementation of the Excavation Work Plan (EWP) during Site redevelopment.
- Implementation of LNAPL recovery including absorbent socks and a Petrotrap™ free product skimmer in selected wells.
- Installation of a vapor barrier and an active sub-slab depressurization (ASD) system beneath the newly constructed manufacturing and commercial office space
- Semi-annual groundwater monitoring.
- Placement of a soil cover system.

Remedial activities were completed in July 2012. The Final Engineering Report (FER) and Site Management Plan (SMP) for the Site were approved by the Department in November 2012. The COC was issued for the Site on December 11, 2012.

### **1.3 Compliance and Recommendations**

Appendix B includes the Site photo log. At the time of the most recent Site inspection (April 27, 2020), the Site was fully compliant with the Department's approved SMP.

The original SMP called for SVE from nine wells, semi-annual groundwater quality monitoring from six monitoring wells, and LNAPL monitoring from three wells. Based on improved unsaturated soil quality observed after COC issuance, Benchmark-TurnKey proposed in a request to NYSDEC dated January 20, 2016 that the SVE system be terminated; this request was approved by the NYSDEC on March 7, 2016. The 2016 PRR recommended termination of the groundwater quality and LNAPL monitoring as groundwater quality had greatly improved and LNAPL had not been detected in over two years. This recommendation was approved in a September 8, 2016 letter from the NYSDEC. Section 2.3.1 describes the well decommissioning for the SVE, groundwater quality, and LNAPL monitoring wells.

## 2.0 SITE MANAGEMENT PLAN

An SMP was prepared for the Site and approved by the Department on November 27, 2012. The SMP includes an Operation, Monitoring and Maintenance (OM&M) Plan, an EWP, and a copy of the Environmental Easement. A brief description of the components of the SMP is presented below.

### 2.1 Operation, Monitoring and Maintenance Plan

The OM&M Plan consists of four major components including the ASD system; LNAPL recovery system; SVE system; and annual inspection and certification. As discussed in Section 1.3, LNAPL recovery, the SVE system, and groundwater monitoring components of the SMP have been terminated (as approved by the NYSDEC) and, as such, these aspects of the OM&M are not discussed further.

#### *2.1.1 Active Sub-Slab Depressurization System*

An ASD system was installed within the newly constructed manufacturing and commercial office space building. As required by the Department-approved SMP, the ASD system must be (1) operated continuously to maintain a negative pressure (below ambient atmospheric) under the floor slab; (2) visually inspected periodically to verify proper operation; and (3) annually inspected and certified that the system is performing properly and remains an effective engineering control.

During the annual Site inspection, the inspector verified that the ASD system was operating properly, as indicated by the readings on the vacuum gauges. Appendix C includes a summary of the monthly ASD system readings. Benchmark did not collect ASD readings in March and April 2020 due to the COVID-19 pandemic; however, the ASD system was still operational.

### 2.2 Annual Inspection and Certification Program

The annual inspection and certification program outlines the requirements for the Site, to certify and attest that the IC/ECs employed at the Site are unchanged from the previous certification. The annual certification consists of an annual Site inspection to complete the NYSDEC's IC/EC Certification Form.



The Site inspection verifies that:

- The IC/ECs are in place and effective and are performing as designed.
- Nothing has occurred that would impair the ability of the controls to protect public health and environment.
- Nothing has occurred that would constitute a violation or failure to comply with any operation and maintenance plan for such controls.
- Access is available to the Site to evaluate continued maintenance of such controls.

A Site inspection of the property was conducted by a Benchmark scientist who meets the requirements of a Qualified Environmental Professional (QEP) on April 27, 2020. At the time of the inspection, the property was being used for the manufacture of rotary seals and unions (Scott Rotary Seals) with surface parking and landscaped areas. No observable indication of intrusive activities was noted during the Site inspection. Scott Rotary Seals uses the local municipal water supply; no observable use of groundwater was noted during the Site inspection.

Appendix A includes the completed Site Management Periodic Review Report Notice – Institutional and Engineering Controls Certification Form. Appendix B includes the photolog of the Site inspection.

## **2.3 Excavation Work Plan (EWP)**

The EWP was included in the approved-SMP for the Site. The EWP provides guidelines for the management of soil/fill material during any future intrusive activities.

No intrusive activities requiring management of on-site soil/fill or the placement of backfill materials were reported or observed to have occurred during the reporting period.

### ***2.3.1 Well Decommissioning***

SVE wells SVE-1 through SVE-9 and groundwater monitoring wells MW-1 through MW-6 were decommissioned on October 17 and 18, 2016. Well decommissioning logs are contained in Appendix D of the 2017 Periodic Review Report.

## 2.4 Engineering and Institutional Control Requirements and Compliance

As detailed in the Environmental Easement, several IC/ECs need to be maintained as a requirement of the BCA for the Site.

### *2.4.1 Institutional Controls*

- Groundwater-Use Restriction: The use of groundwater for potable and non-potable purposes is prohibited.
- Land-Use Restriction: The property may be used for commercial and/ or industrial use.
- Implementation of the SMP including the OM&M Plan and EWP.

### *2.4.2 Engineering Controls*

- Vapor Mitigation: The ASD system has been operated continuously and properly maintained.
- Cover System: The cover system, including building foundations; concrete sidewalks; asphalt and gravel driveways and parking areas; and landscaped vegetated areas are all being maintained in compliance with the SMP.

### **3.0 CONCLUSIONS AND RECOMMENDATIONS**

#### **3.1 Conclusions**

At the time of the Site inspection, the Site complied with the SMP. Specifically, the Site is fully compliant with the ICs including land-use restrictions, groundwater-use restrictions, and the EWP component, and the ECs including continuous operation of the ASD system and maintenance of the cover system.

#### **3.2 Recommendations**

Based on our observations, we recommend continued annual Site inspections with the next PRR due June 1, 2023.

#### 4.0 DECLARATION/LIMITATION

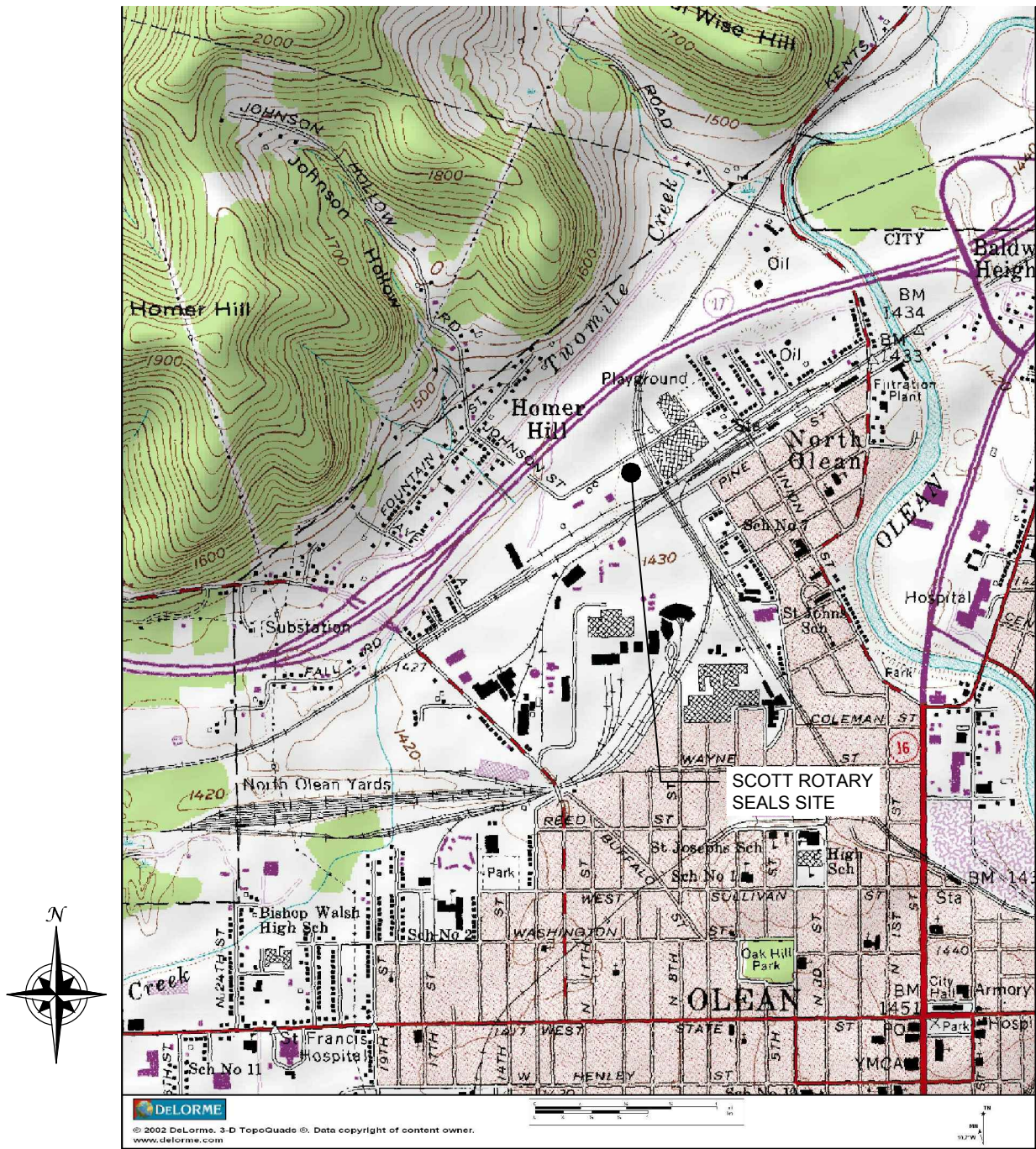
Benchmark Environmental Engineering & Science, PLLC, personnel conducted the annual Site inspections for BCP Site No. C905036, Olean, New York, according to generally accepted practices. This PRR complied with the scope of work provided to DST Properties NY, LLC by Benchmark Environmental Engineering & Science, PLLC in association with TurnKey Environmental Restoration, LLC.

This PRR has been prepared for the exclusive use of DST Properties NY, LLC. The contents of this PRR are limited to information available at the time of the Site inspection. The findings herein may be relied upon only at the discretion of DST Properties NY, LLC. Use of or reliance on this PRR or its findings by any other person or entity is prohibited without written permission of Benchmark Environmental Engineering & Science, PLLC and TurnKey Environmental Restoration, LLC.

## FIGURES



FIGURE 1



2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218, (716) 856-0599



## SITE LOCATION AND VICINITY MAP

PERIODIC REVIEW REPORT  
SCOTT ROTARY SEALS SITE

OLEAN, NEW YORK  
PREPARED FOR  
DST PROPERTIES NY, LLC

**DISCLAIMER:** PROPERTY OF BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC. & TURNKEY ENVIRONMENTAL RESTORATION, LLC. **IMPORTANT:** THIS DRAWING PRINT IS LOANED FOR MUTUAL ASSISTANCE AND AS SUCH IS SUBJECT TO RECALL AT ANY TIME. INFORMATION CONTAINED HEREON IS NOT TO BE DISCLOSED OR REPRODUCED IN ANY FORM FOR THE BENEFIT OF PARTIES OTHER THAN NECESSARY SUBCONTRACTORS & SUPPLIERS WITHOUT THE WRITTEN CONSENT OF BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC & TURNKEY ENVIRONMENTAL RESTORATION, LLC.





APPROXIMATE SCALE 1" = 100'

——— Property Boundary (Approximate)

Base Image Google Earth April 2007



2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218, (716) 856-0599



PROJECT NO.: 0189-020-001

DATE: MARCH 2020

DRAFTED BY: RFL

## SITE PLAN PRE-REMEDATION

PERIODIC REVIEW REPORT  
SCOTT ROTARY SEALS SITE  
OLEAN, NEW YORK

PREPARED FOR  
DST PROPERTIES NY, LLC

**FIGURE 2**

**DISCLAIMER: PROPERTY OF BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC. & TURNKEY ENVIRONMENTAL RESTORATION, LLC IMPORTANT: THIS DRAWING PRINT IS LOANED FOR MUTUAL ASSISTANCE AND AS SUCH IS SUBJECT TO RECALL AT ANY TIME. INFORMATION CONTAINED HEREON IS NOT TO BE DISCLOSED OR REPRODUCED IN ANY FORM FOR THE BENEFIT OF PARTIES OTHER THAN NECESSARY SUBCONTRACTORS & SUPPLIERS WITHOUT THE WRITTEN CONSENT OF BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC & TURNKEY ENVIRONMENTAL RESTORATION, LLC.**





Approximate Scale 1" = 100'

Property Boundary (Approximate)

Base Image Google Earth August 2016



2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218, (716) 856-0599



PROJECT NO.: 0189-020-001

DATE: MARCH 2020

DRAFTED BY: RFL

## SITE PLAN POST-REMEDIATION

PERIODIC REVIEW REPORT  
SCOTT ROTARY SEALS SITE  
OLEAN, NEW YORK

PREPARED FOR  
DST PROPERTIES NY, LLC

FIGURE 3

**DISCLAIMER: PROPERTY OF BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC. & TURNKEY ENVIRONMENTAL RESTORATION, LLC IMPORTANT: THIS DRAWING PRINT IS LOANED FOR MUTUAL ASSISTANCE AND AS SUCH IS SUBJECT TO RECALL AT ANY TIME. INFORMATION CONTAINED HEREON IS NOT TO BE DISCLOSED OR REPRODUCED IN ANY FORM FOR THE BENEFIT OF PARTIES OTHER THAN NECESSARY SUBCONTRACTORS & SUPPLIERS WITHOUT THE WRITTEN CONSENT OF BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC & TURNKEY ENVIRONMENTAL RESTORATION, LLC.**



## APPENDIX A

### INSTITUTIONAL & 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 No.**                      **C905036**                      **Site Details**                      **Box 1**

**Site Name**   **Scott Rotary Seals**

Site Address: 301 Franklin Street                      Zip Code: 14760  
City/Town: Olean  
County: Cattaraugus  
Site Acreage: 2.000

Reporting Period: ~~May 02, 2017 to May 02, 2020~~  
                                June 1, 2017 to May 31, 2020

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

- |  | <b>Box 2</b>                        |                          |
|--|-------------------------------------|--------------------------|
|  | YES                                 | NO                       |
| 6. Is the current site use consistent with the use(s) listed below?<br>Commercial and Industrial | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Are all ICs/ECs in place and functioning as designed?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**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?

☐☒

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

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

☒☐

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

**SITE NO. C905036****Box 3****Description of Institutional Controls**ParcelOwnerInstitutional Control**94.040-1-29.02**

DST Properties NY, LLC

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

Soil Management Plan  
IC/EC Plan

The Environmental Easement filed on 08/15/2012 requires compliance with the approved Site Management Plan (SMP) dated November 2012. Controls required under the SMP include:

- Property may only be used for commercial or industrial uses. Lower uses (residential/restricted residential), farming and vegetable gardens prohibited.
- Groundwater use restriction.
- soil and hardscape cover system covering the entire surface of the site (approximately 2 acres)
- Active sub-slab depressurization system to mitigate potential vapor intrusion into the existing on-site building. Future on-site buildings require vapor intrusion assessment or mitigation.
- Monthly system monitoring. Annual site inspection and certifications.

**Box 4****Description of Engineering Controls**ParcelEngineering Control**94.040-1-29.02**

Vapor Mitigation  
Cover System

**Periodic Review Report (PRR) Certification Statements**

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

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

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

YES NO

☒ ☐

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

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

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

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

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

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

YES NO

☒ ☐

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

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

\_\_\_\_\_  
Signature of Owner, Remedial Party or Designated Representative

\_\_\_\_\_  
Date

IC CERTIFICATIONS  
SITE NO. C905036

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 Jeff Meister at DST Properties NY, LLC, 301 Franklin Street, Olean, NY 14760,  
print name print business address

am certifying as President and Owner (Owner or Remedial Party)

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

Jeff Meister  2020.05.15 14:07:35 -05'00'  
Signature of Owner, Remedial Party, or Designated Representative  
Rendering Certification

5/15/2020  
Date

IC/EC CERTIFICATIONS

Box 7

Professional Engineer Signature

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

I Lori E. Riker, P.E. at Benchmark Environmental Engineering & Science, PLLC, 2558  
print name Hamburg Turnpike, Suite 300 Buffalo, NY 14218 print business address

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

Lori E. Riker

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



Stamp  
(Required for PE)

5/15/2020

Date

**Enclosure 3**  
**Periodic Review Report (PRR) General Guidance**

- I. Executive Summary: (1/2-page or less)
  - A. Provide a brief summary of site, nature and extent of contamination, and remedial history.
  - B. Effectiveness of the Remedial Program - Provide overall conclusions regarding;
    - 1. progress made during the reporting period toward meeting the remedial objectives for the site
    - 2. the ultimate ability of the remedial program to achieve the remedial objectives for the site.
  - C. Compliance
    - 1. Identify any areas of non-compliance regarding the major elements of the Site Management Plan (SMP, i.e., the Institutional/Engineering Control (IC/EC) Plan, the Monitoring Plan, and the Operation & Maintenance (O&M) Plan).
    - 2. Propose steps to be taken and a schedule to correct any areas of non-compliance.
  - D. Recommendations
    - 1. recommend whether any changes to the SMP are needed
    - 2. recommend any changes to the frequency for submittal of PRRs (increase, decrease)
    - 3. recommend whether the requirements for discontinuing site management have been met.
- II. Site Overview (one page or less)
  - A. Describe the site location, boundaries (figure), significant features, surrounding area, and the nature and extent of contamination prior to site remediation.
  - B. Describe the chronology of the main features of the remedial program for the site, the components of the selected remedy, cleanup goals, site closure criteria, and any significant changes to the selected remedy that have been made since remedy selection.
- III. Evaluate Remedy Performance, Effectiveness, and Protectiveness  
Using tables, graphs, charts and bulleted text to the extent practicable, describe the effectiveness of the remedy in achieving the remedial goals for the site. Base findings, recommendations, and conclusions on objective data. Evaluations and should be presented simply and concisely.
- IV. IC/EC Plan Compliance Report (if applicable)
  - A. IC/EC Requirements and Compliance
    - 1. Describe each control, its objective, and how performance of the control is evaluated.
    - 2. Summarize the status of each goal (whether it is fully in place and its effectiveness).
    - 3. Corrective Measures: describe steps proposed to address any deficiencies in ICECs.
    - 4. Conclusions and recommendations for changes.
  - B. IC/EC Certification
    - 1. The certification must be complete (even if there are IC/EC deficiencies), and certified by the appropriate party as set forth in a Department-approved certification form(s).
- V. Monitoring Plan Compliance Report (if applicable)
  - A. Components of the Monitoring Plan (tabular presentations preferred) - Describe the requirements of the monitoring plan by media (i.e., soil, groundwater, sediment, etc.) and by any remedial technologies being used at the site.
  - B. Summary of Monitoring Completed During Reporting Period - Describe the monitoring tasks actually completed during this PRR reporting period. Tables and/or figures should be used to show all data.
  - C. Comparisons with Remedial Objectives - Compare the results of all monitoring with the remedial objectives for the site. Include trend analyses where possible.
  - D. Monitoring Deficiencies - Describe any ways in which monitoring did not fully comply with the monitoring plan.
  - E. Conclusions and Recommendations for Changes - Provide overall conclusions regarding the monitoring completed and the resulting evaluations regarding remedial effectiveness.
- VI. Operation & Maintenance (O&M) Plan Compliance Report (if applicable)
  - A. Components of O&M Plan - Describe the requirements of the O&M plan including required activities, frequencies, recordkeeping, etc.
  - B. Summary of O&M Completed During Reporting Period - Describe the O&M tasks actually completed during this PRR reporting period.
  - C. Evaluation of Remedial Systems - Based upon the results of the O&M activities completed, evaluated

the ability of each component of the remedy subject to O&M requirements to perform as designed/expected.

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

#### VII. Overall PRR Conclusions and Recommendations

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

#### VIII. Additional Guidance

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



# APPENDIX B

## SITE PHOTOGRAPHIC LOG

## SITE PHOTOGRAPHS (April 27, 2020)

Photo 1:



Photo 2:



Photo 3:



Photo 4:



- Photo 1: Front of Scott Rotary Seals (SRS) Building showing vegetative and asphalt cover (looking southeast)
- Photo 2: Entrance to SRS Building from Franklin St. showing asphalt and concrete cover (looking east)
- Photo 3: West side of SRS Building showing vegetative and stone cover (looking northeast)
- Photo 4: South side of SRS Building showing vegetative cover (looking north)

## SITE PHOTOGRAPHS (April 27, 2020)

Photo 5:



Photo 6:



Photo 7:



Photo 8:



Photo 5: Rear side (south) of SRS Building showing vegetative and stone cover (looking west)

Photo 6: East side of SRS Building showing stone and asphalt cover (looking southwest)

Photo 7: East side of SRS Building showing vegetative cover and storm water detention basin (looking south)

Photo 8: Northeast corner of SRS Building showing concrete and asphalt cover (looking west)

## APPENDIX C

### ASD PERIODIC INSPECTION LOG

**TABLE 1**  
**Scott Rotary Seals Site (C905036)**  
**ASD System Inspection Log**

Date	Time	Inspector's Initials	ASD-1 (in.WC)	ASD-2 (in.WC)	ASD-3 (in.WC)	ASD-4 (in.WC)	ASD-5 (in.WC)	ASD-6 (in.WC)	ASD-7 (in.WC)
6/28/2017	13:40	BMG	2.00	1.80	1.85	1.90	1.35	1.60	1.40
7/14/2017	13:15	BMG	2.10	1.80	1.85	1.90	1.35	1.50	1.40
8/4/2017	14:15	BMG	2.10	1.80	1.85	1.90	1.35	1.50	1.40
9/28/2017	12:05	CFD	2.10	1.80	1.85	2.00	1.40	1.50	1.40
10/30/2017	12:50	CFD	2.20	1.80	1.85	1.8-2.0	1.50	1.50	1.50
11/28/2017	15:45	CFD	2.20	1.85	1.85	1.95	1.45	1.60	1.50
12/29/2017	11:25	CFD	2.10	1.80	1.80	1.95	1.45	1.60	1.40
1/19/2018	14:45	CFD	2.20	1.80	1.80	1.95	1.40	1.60	1.50
2/12/2018	13:10	CFD	2.10	1.85	1.80	1.90	1.35-1.45	1.60	1.50
3/15/2018	14:30	CFD	2.10	1.85	1.80	1.90	1.40	1.60	1.50
4/27/2018	12:55	CFD	2.10	1.85	1.80	1.90	1.35	1.60	1.40
5/25/2018	12:40	CFD	2.00	1.80	1.80	1.90	1.40	1.60	1.40
6/28/2018	9:30	CFD	2.10	1.85	1.85	2.00	1.45	1.60	1.50
7/26/2018	14:05	CFD	2.00	1.80	1.85	1.95	1.45	1.60	1.40
8/17/2018	14:35	CFD	2.00	1.85	1.80	1.95	1.45	1.60	1.40
9/20/2018	13:50	CFD	2.00	1.85	1.85	2.00	1.45	1.60	1.40
10/22/2018	12:30	CFD	2.10	1.85	1.90	2.00	1.45	1.60	1.50
11/28/2018	14:00	CFD	2.10	1.80	1.90	1.90	1.45	1.60	1.40
12/14/2018	13:05	CFD	2.00	1.85	1.80	1.90	1.40	1.60	1.40
1/25/2019	13:45	CFD	1.80	1.85	1.8-1.9	1.95	1.45	1.60	1.40
2/27/2019	14:35	CFD	1.80	1.80	1.80	1.85	1.35	1.60	1.40
3/22/2019	15:15	CFD	1.80	1.85	1.80	1.85	1.40	1.60	1.40
4/22/2019	12:25	CFD	1.75	1.85	1.80	1.90	1.35	1.60	1.40
5/22/2019	12:50	CFD	1.85	1.85	1.80	1.90	1.35	1.60	1.40
6/21/2019	13:30	CFD	1.80	1.85	1.80	1.90	1.40	1.60	1.40
7/25/2019	14:00	CFD	1.85	1.85	1.80	1.90	1.40	1.60	1.40
8/30/2019	14:30	CFD	1.85	1.85	1.85	1.95	1.45	1.60	1.40
10/31/2019	15:28	CWE	2.00	1.85	1.85	1.95	1.45	1.60	1.40
11/25/2019	14:30	CWE	2.00	1.85	1.85	1.95	1.44	1.60	1.40
12/30/2019	14:00	CWE	2.00	1.85	1.85	1.95	1.44	1.60	1.40
1/30/2020	13:10	CWE	2.00	1.85	1.85	1.80	1.40	1.60	1.40
2/3/2020	13:25	CWE	1.98	1.85	1.85	1.80	1.40	1.60	1.40
03/2020	Data Not Recorded by Benchmark due to COVID-19								
04/2020									
5/14/2020	15:10	CWE	1.98	1.84	1.75	1.80	1.35	1.60	1.40