Periodic Review Report

FORMER BUFFALO SERVICE CENTER, BURA WEST & 4 NEW SEVENTH STREET SITES (BCP SITE NOS. C915194, C915195, & C915203)

BUFFALO, NEW YORK

July 2019

0235-019-001

Prepared By:

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PERIODIC REVIEW REPORT
for the

FORMER BUFFALO SERVICE CENTER, BURA WEST PROPERTY & 4 NEW SEVENTH STREET SITES
(BCP SITE NOS. C915194, C915195 & C915203)

BUFFALO, NEW YORK

July 2019 0235-018-001

Prepared for:

257 W. GENESEE, LLC

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1.0 INTRODUCTION

Benchmark Environmental Engineering & Science, PLLC (Benchmark) has prepared this Periodic Review Report (PRR) on behalf of 257 W. Genesee, LLC to summarize the post-remedial status of New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) Site Nos. C915194, C915195, and C915203.

This PRR has been prepared in accordance with NYSDEC's DER-10 *Technical Guidance for Site Investigation and Remediation* (Ref. 1), whereby one PRR is prepared when multiple parcels comprise the redeveloped Site. The NYSDEC's Institutional and Engineering Controls Certification Forms have been prepared for each individual Site (see Appendix C). This PRR and the associated inspections forms have been completed for the June 15, 2018 to June 15, 2019 reporting period.

1.1 Background

The 257 W. Genesee, LLC property (Site) encompasses three adjoining BCP Sites. The three parcels include: (1) the Former Buffalo Service Center Site (C915194); (2) the Buffalo Urban Renewal Agency (BURA) West Site (C915195); and (3) the 4 New Seventh Street Site (C915203) (see Figures 1 and 2).

The Former Buffalo Service Center (C915194) and the BURA West (C915195) parcels were the former location of the Buffalo Gas Light Company's (predecessor to National Fuel Gas) Manufactured Gas Plant (MGP), which operated from approximately 1848 to 1948. Site investigations revealed that the century of industrial use on these parcels resulted in contamination of the soil/fill and groundwater with certain petroleum organics and cyanide. The 4 New Seventh Street (C915203) parcel was the location of a former coal storage yard until approximately 1900; a gasoline service station from 1927-1966; and various commercial/industrial operations. Impacts at this parcel were primarily related to former petroleum storage and distribution operations.

The three parcels were remediated concurrently under the NYSDEC BCP for redevelopment as an office building complex. Additional details relative to the history and remedial activities conducted at each of the parcels are discussed in Section 2.0.

2.0 SITE OVERVIEW

The Site is comprised of three former industrial/commercial properties located in the City of Buffalo, New York (see Figure 1). The Site is bordered by Fourth Street to the west, West Genessee Street to the south, and Seventh Street to the east; the Waterfront School borders the Site to the north (see Figure 2). A brief description of the three parcels is presented below.

2.1 Former Buffalo Service Center & BURA West Properties

The former Buffalo Service Center (BSC) property (BCP Site No. C915194) is an approximately 4.9-acre parcel located at the corner of West Genesee and Seventh Streets. The BURA West property (BCP Site No. C915195) is an approximately 1.7-acre parcel located west of the BSC property along Fourth Street. The BSC and BURA West properties were the location of the former Buffalo Gas Light Company MGP that operated from approximately 1848 to 1948.

Previous environmental site investigations revealed the presence of: volatile organic compounds (VOCs), specifically benzene, toluene, ethylbenzene, and xylene (BTEX); semi-volatile organic compounds (SVOCs), primarily polycyclic aromatic hydrocarbons (PAHs); and cyanide in on-site soil and groundwater.

In June 2005, remedial efforts under the BCP began with the excavation and off-site disposal of approximately 153,000 tons of contaminated soil/fill followed by backfilling the excavation with clean material. Remedial activities at the former BSC and BURA West properties were completed in September 2006. All impacted soil/fill above cleanup levels was removed, and in 2006 the NYSDEC determined that the Site "no longer poses a significant threat to the environment." Certificates of Completion (COCs) were issued for the two properties in November 2006.

2.2 New Seventh Street Property

The 4 New Seventh Street property (BCP Site No. C915203) is comprised of an approximate 1.7-acre parcel located east of the BSC property along Seventh Street. The New Seventh Street parcel was formerly a coal shed and storage yard until approximately 1900.

From 1927-1966 this parcel housed gasoline service stations. Various other commercial/industrial operations have also been located on the property. Environmental site investigations conducted on-site revealed the presence of petroleum-based VOCs and SVOCs in soil/fill and groundwater.

Remedial activities under the BCP began in May 2006 with excavation and off-site disposal of approximately 6,600 tons of contaminated soil/fill followed by backfilling the excavation with clean material. All impacted soil/fill within the property boundaries was removed to meet cleanup levels. A COC was issued for the Site in December 2006.

3.0 SITE MANAGEMENT PLAN

A combined Site Management Plan (SMP) was prepared by ESC Engineering of New York, P.C., for the Buffalo Service Center and BURA West properties and approved by the NYSDEC in October 2006. A separate SMP was prepared by Lender Consulting Services (LCS) for the 4 New Seventh Street Site in December 2006. The SMPs include a Groundwater Monitoring Plan, a Soil/Fill Management Plan, and a copy of the Environmental Easements. A brief description of the components of the SMP is presented below.

3.1 Groundwater Monitoring Plan

As a component of the NYSDEC-approved SMPs, post-remedial groundwater monitoring was required for the Site on a quarterly basis for two years following completion of the remedial activites. A total of 10 montioring wells on and outside of the Site were sampled and analyzed for petroleum-based organic compounds per the SMP requirements, with quarterly groundwater monitoring results forwarded to the NYSDEC following each event. Groundwater monitoring began in August 2007, and the eighth quarterly groundwater monitoring event was completed by WSP Enginering (WSP) in May 2009. Wells MW-03 and MW-09 were slated for sampling under both the ESC SMP for the former BSC and BURA West parcels as well as the LCS SMP for the 4 New Seventh Street parcel; therefore, they were sampled under both programs with duplicate samples collected from these well locations each quarter. MW-04 exhibited a thin layer of light non-aqueous phase liquid (LNAPL) during the initial monitoring event and was therefore excluded from subsequent sampling due to the likelihood for positive bias from this layer. The LNAPL is believed to be attributable to residual off-site impact west of the property boundary which was addressed through offsite remedial excavation work by other responsible parties.

The Eighth Quarterly Groundwater Monitoring Report (prepared by WSP) presented trend analyses for wells MW-01, MW-03, BCP-MW-04, BCP-MW-05, and MW-09. Excluding MW-04, the remaining locations exhibited non-detectable or sufficiently low concentrations to preclude the need for trend evaluation. In general, concentrations dropped over the 2-year period at most locations, with notable exception at off-site well MW-09 where the concentration trend analysis showed an increase in the benzene concentration.

Based on the MW-09 results, a Pre-Design Investigation Report and Chemical Oxidation Enhanced Bioremediated Work Plan (July 2009) was prepared by WSP. The Work Plan proposed the injection of Klozer CR® in the vicinity of MW-09. NYSDEC approved the subsequent Work Plan, and the injection was performed in August 2009. Post-injection groundwater monitoring was initiated as part of the Work Plan, including quarterly monitoring for one year at MW-09 and semi-annual monitoring for one year at MW-01 and MW-03. WSP conducted the first round of groundwater monitoring for MW-09, MW-01, and MW-03 in November 2009. The subsequent round of groundwater monitoring was performed in August 2010. A performance monitoring report was prepared by WSP in October 2010. Based on the monitoring data, WSP recommended two additional quarters of data from MW-09, and no further action from monitoring wells MW-01 and MW-03.

Concurrently, BCP-MW-02 was decommissioned with NYSDEC approval in January 2010. Monitoring wells BCP-MW-05 and PZ-10 were decommissioned with NYSDEC approval in June 2010. Due to the results of the quarterly groundwater monitoring previously conducted and ongoing remediation at MW-09, the NYSDEC requested additional sampling of BCP-MW-04. Monitoring well BCP-MW-04 was sampled in May 2011. Since all concentrations were non-detect during the May 2011 monitoring event, the NYSDEC approved termination of monitoring at BCP-MW-04.

Sampling at off-site well MW-09 was performed by WSP in June, September, and November 2011. The November 2011 sampling event followed redevelopment of the well, as reduced yield and inconsistent results in September indicated that the well screen was partially clogged. Redevelopment was unsuccessful and in December 2011 well MW-09 was replaced with a well MW-09R. Well MW-09R was sampled by WSP in February 2012, however concentrations did not improve.

In November of 2012 WSP transmitted correspondence to the NYSDEC which proposed an additional two years of annual groundwater monitoring at wells MW-09R and MW-03 for petroleum-based volatile organics. The samples were collected in February 2013 and February 2014. Results are summarized in Appendix A with prior historic data for those monitoring locations. In general, the data indicated fairly consistent concentrations remaining above the groundwater quality standards, most notably for benzene in MW-09R.

In June of 2015 Benchmark was notified by the NYSDEC that annual groundwater monitoring would need to continue at wells MW-09R and MW-03. Following discussions with the remedial parties and 257 W. Genesee, LLC, it was agreed that Duke Realty (the original member of 257 W. Genesee, LLC) would assume responsibility for the groundwater monitoring. Benchmark was retained to perform the sampling, which was completed in November of 2015. The sampling has since been repeated annually.

Sample results for the November 2018 event are presented on Table 1 (these data were previously transmitted to the Department following receipt last fall). The laboratory analytical report is included as Appendix B. A comparison to prior (2012-2018) results is presented as Table 2. As indicated, 2018 concentrations at MW-09R remain at less than half of the concentration reported in 2012-2014, although the benzene concentration increased from the prior event. At MW-03 concentrations were reported at their lowest levels across the entire 2012 – 2018 period.

3.2 Soil/Fill Management Plan

A Soil/Fill Management Plan (SFMP) was included in the NYSDEC-approved SMPs for the Site. The SFMP provides guidelines for the management of soil and fill material during any future intrusive actives that disturb soil/fill greater than 12 inches below surface-grade. A passive vapor barrier was installed into the foundation slab of the office buildings during construction.

No intrusive activities requiring management of on-site soil or fill material occurred during the monitoring period.

3.3 Institutional Control Requirements and Compliance

As detailed in the Environmental Easements filed with the Erie County, New York, several Institutional Controls (ICs) need to be maintained as a requirmement of the BCAs for the Site. All three properties encompassing the Site are subject to the same ICs:

- Land-Use Restriction: The controlled property may be used for commercial and/or industrial use;

- Implementation of the SMP including the Groundwater Monitoring Plan, Soil/Fill Management Plan, and Monitoring Plan; and

- Groundwater-Use Restriction: The use of groundwater for potable and non-potable purposes is prohibited.

Benchmark conducted a Site Inspection of the exterior of the property on June 17, 2019. At the time of the Site Inspection the property was being used as a large office building complex with an elevated parking ramp, surface parking, paved walkways, and landscaped grassy areas consistent with prior use. The office complex is on municipal water supply, and no observable use of groundwater was noted during the Site Inspection. In addition, no observable indication of ground-intrusive activities was noted during the Site Inspection.

Appendix C includes completed Institutional and Engineering Controls Certification Forms for the Site. Appendix E presents a photographic log of the Sites as of the 2018 Site Inspection.

4.0 CONCLUSIONS AND RECOMMENDATIONS

Benchmark has made the following conclusions and recommendations for the reporting period June 15, 2018 to June 15, 2019:

- At the time of the Site Inspection (June 17, 2019), the Site was in compliance with both SMPs.
- Based upon consistent conformance with SMP requirements and fact that the Site is fully redeveloped with no changes in use or configuration for several years, it is requested that the PRR reporting frequency be reduced from annual to once every 2 years. Groundwater sample analysis and reporting will continue annually with results summarized and transmitted to the Department upon receipt until such time as the Department agrees the monitoring schedule can be modified or sampling terminated.

5.0 DECLARATION/LIMITATION

Benchmark Environmental Engineering & Science, PLLC personnel conducted the annual site inspections for BCP Site Nos. C915194, C915195, and C915203 in Buffalo, New York in accordance with generally accepted practices. This report complies with the scope of work provided to 257 W. Genesee, LLC by Benchmark Environmental Engineering and Science, PLLC.

This report has been prepared for the exclusive use of 257 W. Genesee, LLC. The contents of this report are limited to information available at the time of the Site Inspection. The findings herein may be relied upon only at the discretion of 257 W. Genesee, LLC. Use of or reliance upon this report or its findings by any other person or entity is prohibited without written permission of Benchmark Environmental Engineering and Science, PLLC.

6.0 REFERENCES

1. New York State Department of Environmental Conservation. *DER-10; Technical Guidance for Site Investigation and Remediation.* May 2010.

2. *Pre-Design Investigation Report, Buffalo Service Center, Buffalo, NY*, dated February 2004, prepared by The RETEC Group, Inc.

3. *Limited and Focused Subsurface Investigation, Seventh Street Site and Fourth Street Site, Buffalo, New York*, dated February 2005, prepared by LCS, Inc.

4. *Limited and Focused Subsurface Investigation, Seventh Street Site and Fourth Street Site, Buffalo, New York*, dated April 2005, prepared by LCS, Inc.

5. *Remedial Investigation Work Plan for 4 New Seventh Street, Buffalo, New York*, prepared by LCS, Inc. and Benchmark Environmental Engineering & Science, PLLC, January 2006.

6. *Interim Remedial Measures Work Plan for Brownfield Cleanup Program - 4 New Seventh Street, Buffalo, New York*, prepared by LCS, Inc. and Benchmark Environmental Engineering & Science, PLLC, February 2006.

7. *Final Engineering Report for Interim Remedial Measures - 4 New Seventh Street, Buffalo, New York*, prepared by LCS, Inc. and Benchmark Environmental Engineering & Science, PLLC, August 2006

8. *Final Remedial Action Report Brownfield Cleanup Program – Former Buffalo Service Center Site (C915194), Buffalo Urban Renewal Agency West Site (C915195) Buffalo, New York,* prepared by ESC Engineering of New York, P.C., October 2006

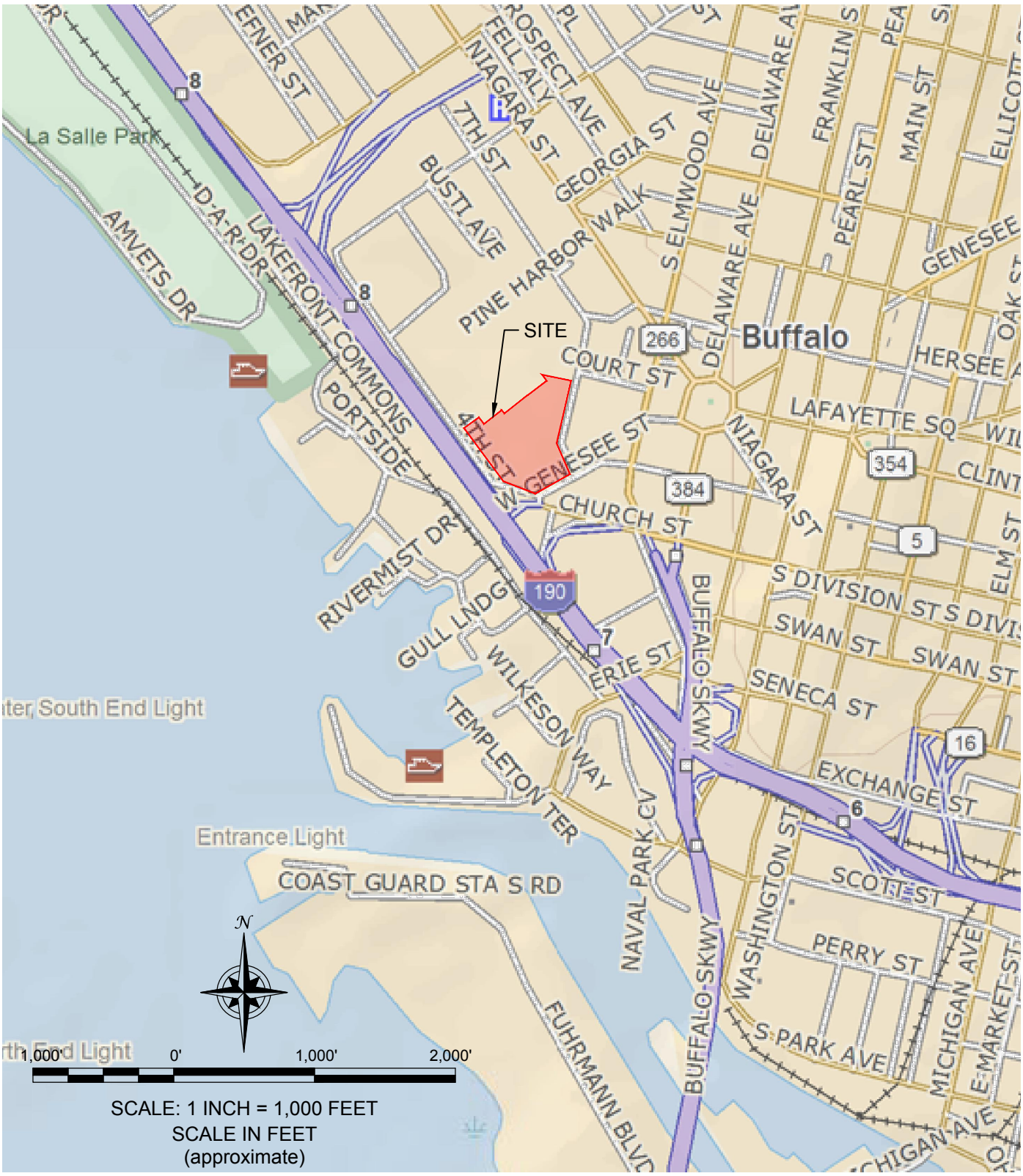
9. *Final Site Management Plan – Former Buffalo Service Center Site (C915194), Buffalo Urban Renewal Agency West Site (C915195), Fourth and West Genesee Streets, Buffalo, New York,* prepared by ESC Engineering of New York, P.C., October 2006

10. *Site Management Plan - 4 New Seventh Street, Buffalo, New York*, prepared by LCS, Inc. and Benchmark Environmental Engineering & Science, PLLC, December 2006.

FIGURES

F:\CAD\Benchmark\Cole Real Estate\2016 PRR\Figure 1; Site Location and Vicinity Map.dwg

FIGURE 1



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PROJECT NO.: 0235-013-001

DATE: MAY 2018

DRAFTED BY: JGT/KRR

SITE LOCATION AND VICINITY MAP

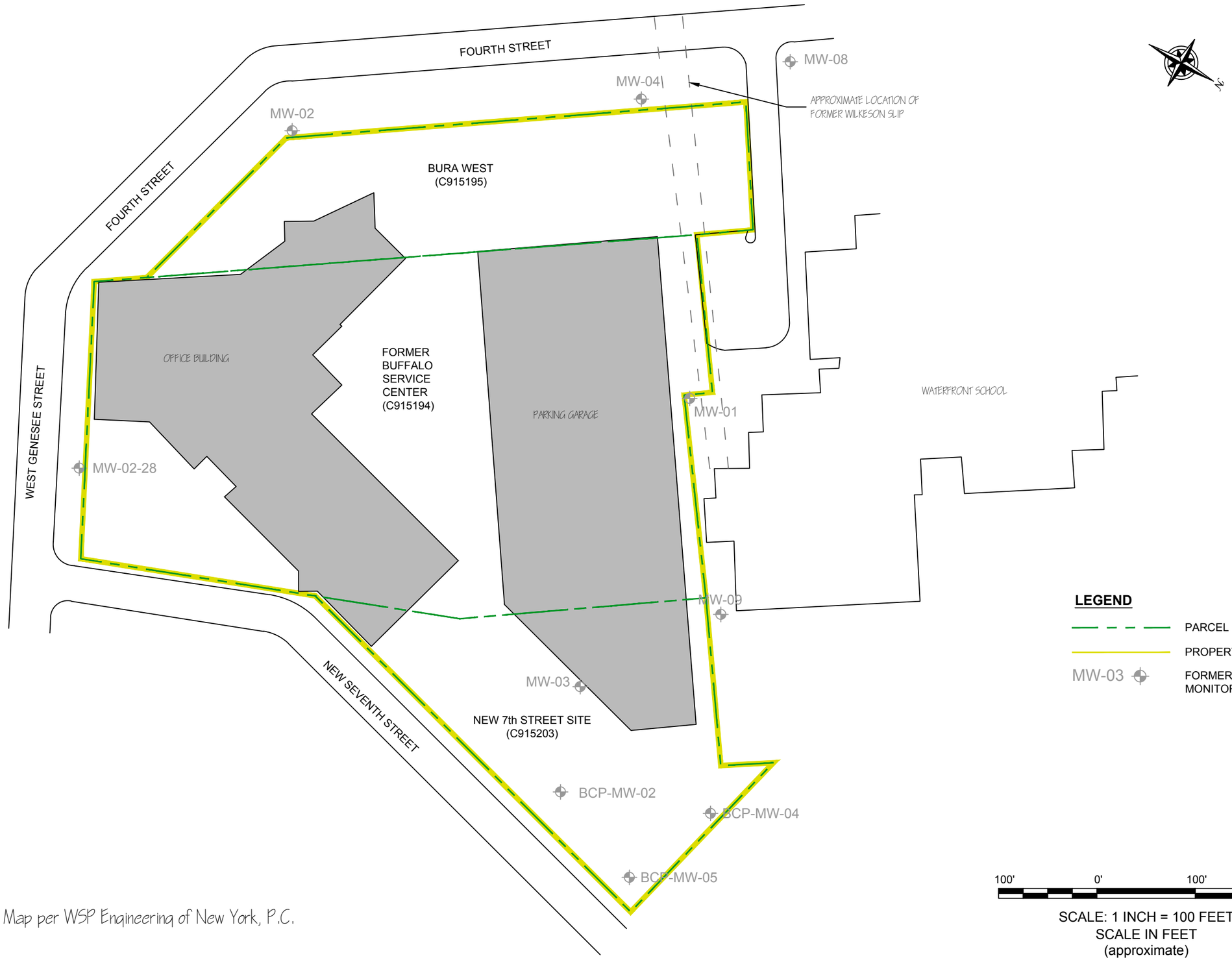
PERIODIC REVIEW REPORT

FORMER BUFFALO SERVICE CENTER, BURA WEST
AND NEW SEVENTH STREET SITES
BUFFALO, NEW YORK

PREPARED FOR

257 WEST GENESEE STREET, LLC

F:\CAD\Benchmark\Cole Real Estate\2016 PRR\Figure 2; Site Plan.dwg



Note:
Base Map per WSP Engineering of New York, P.C.

DATE: MARCH 2016
DRAFTED BY: NTM/KRR

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SITE PLAN

PERIODIC REVIEW REPORT
FORMER BUFFALO SERVICE CENTER, BURA WEST AND NEW SEVENTH STREET SITES
BUFFALO, NEW YORK
PREPARED FOR
257 W. GENESEE STREET, LLC

FIGURE 2

TABLES

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

TABLE 1

SUMMARY OF GROUNDWATER ANALYTICAL RESULTS
23-Nov-18

257 West Genesse, LLC
New Seventh St.
Buffalo, New York

Parameter [1]	Monitoring Well			Class GA GWQS
	MW-03	MW-09R	Trip Blank	
NYSDEC STARS LIST VOCs (ug/L)				
Acetone	-	-	-	
Benzene	100	1700	ND	1
sec-Butylbenzene	ND	ND	ND	5
p-Cymene	ND	ND	ND	5
Ethylbenzene	2.7	ND	ND	5
Isopropylbenzene	ND	ND	ND	5
n-Propylbenzene	ND	ND	ND	5
Toluene	ND	ND	ND	5
1,2,4-Trimethylbenzene	1.1 J	ND	ND	5
1,3,5-Trimethylbenzene	ND	ND	ND	5
o-Xylene	2.9	ND	ND	5
m/p- Xylene	ND	ND	ND	5
Field Parameters				
Temperature (ºC)	10.9	8.5	-	-
Specific Conductance (uS)	3284	2702	-	-
Dissolved Oxygen (mg/L)	1.51	1.56	-	-
pH (s.u.)	6.8	7.05	-	-
ORP (mV)	-74	-77	-	-
Turbidity (NTUs)	136	616	-	-
Purge volume (gal)	6.3	6.75	-	-

Notes:

1. Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.

Definitions:

D03 = Dilution required due to excess foaming.

ND = Not Detected

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

TABLE 2

SUMMARY OF HISTORICAL RESULTS
2/8/2012 TO 11/23/2018

257 West Genesse, LLC
New Seventh St.
Buffalo, New York

Parameter [1]	Monitoring Well																Class GA GWQS
	MW-03 2/14/2013	MW-03 2/14/2013	MW-03 2/19/2014	MW-03 2/19/2014	MW-03 11/27/2015	MW-03 11/11/2016	MW-03 11/10/2017	MW-03 11/23/2018	MW-09R 2/8/2012	MW-09R 2/8/2012	MW-09R 2/14/2013	MW-09R 2/19/2014	MW-09R 11/27/2015	MW-09R 11/11/2016	MW-09R 11/10/2017	MW-09R 11/23/2018	
NYSDEC STARS LIST VOCs (ug/L)																	
Acetone	50 U	10 U	-	-	-	-	-	-	250 U	250 U	800 U	-	-	-	-	-	
Benzene	**260**	**250**	**330**	**310**	**170**	**840**	**460**	**100**	**6,100**	**5,000**	**6,800**	**4,000**	**2,300**	**1900**	**1100**	**1700 D**	1
2-Butanone	50 U	10 UF	-	-	-	-	-		250 U	250 U	800 UF	-	-	-	-	-	
Ethylbenzene	**40**	**36**	**45**	**43**	**20**	**360**	**120**	2.7	**110**	**72**	**150**	80 U	18 U	28 U	ND	ND	5
Isopropylbenzene	-	-	-	-	3 J	**40 J**	**18**		-	-	-	-	-	ND	ND	ND	5
n-Propylbenzene					ND	ND	4.9 J							ND	ND	ND	5
Toluene	5 U	1 U	5 U	2.4 J	10 U	**18 J**	**7.7 J**		25 U	25 U	80 U	80 U	18 U	28 U	7 U	ND	5
1,2,4-Trimethylbenzene					5 U	**160**	**36**	1.1 J						ND	ND	ND	5
1,3,5-Trimethylbenzene					5 U	14 U	2.8 U							ND	ND	ND	5
o-Xylene					5 U	**65**	**18**							ND	ND	ND	5
m/p- Xylene					5 U	**20 J**	ND							ND	ND	ND	5
Total Xylenes	10 U	2.5	3.8 J	3.2 J	10 U	**85**	18		37 J	31 J	160 U	160 U	18 U	28 U	7 U	ND	5
Field Parameters																	
Temperature (ºC)	11.47	-	10.01	-	14.7	14.5	11.3		5.4	-	4.98	7.03	13.1	11	7.2	7.2	
Specific Conductance (umho/cm)	2.61	-	2.46	-	3028	4449	3652		3.25	-	3.79	3.31	3061	2612	2233	2233	
Dissolved Oxygen (mg/L)	7.91	-	8.38	-	2.27	1.36	2.17		1.05	-	13.78	9.32	2.55	2.88	3.2	3.2	
pH (s.u.)	6.84	-	7.39	-	7.02	7.25	7.17		7.07	-	6.92	7.47	7.09	7.33	7.5	7.5	
ORP (mV)	-82	-	-116	-	-103	-228	-168		36	-	-81	-86	-81	-175	-179	-179	
Turbidity (NTUs)	55.4	-	-	-	31.3	154	184		49.2	-	105	-	71000	121	425	425	
Purge volume (gal)	5.28	-	6.96	-	6	6	6		1.2	-	6.54	8.84	6.75	6.75	6.75	6.75	

Notes:
1. Only those parameters detected at a minimum of one sample location are presented in this table;
all other compounds were reported as non-detect.

Definitions:
J = Analyte detected at less than the Reporting Limit (RL) and greater than or equal to the Method Detection Limt (MDL).
ND = Not Detected
U= constituent not detected at reported detection limit
"-" indicates standard not developed or constituent not analyzed
Highlighted, bolded implies Class GA exceedances

APPENDIX A

HISTORICAL GROUNDWATER SAMPLE RESULTS: MW-03 & MW-09/MW-09R

Table 1

Summary of MW-09 and MW-09R
Results
QLT Buffalo
Buffalo, New York (a)

Well I.D.:		**MW-09**									
Event:		**Quarterly Monitoring**									
Sample Date:		**08/20/07 (e)**	**08/21/07**	**11/27/07**	**03/03/08**	**05/27/08**	**08/25/08**	**11/20/08**	**12/18/2008 (f)**	**02/24/09**	**05/19/09**
Parameters	**NSYDEC Standards (c)**										
Volatile Organic Compounds (µg/l)											
Acetone	50	-	-	-	-	-	-	-	-	-	-
Benzene	1	**4,000 D (d)**	**980**	**1,700**	**3,300**	**12,000**	**7,600**	**3,600**	**670**	**13,000**	**10,000**
2-Butanone	50	-	-	-	-	-	-	-	-	-	-
Ethylbenzene	5	**6**	1.3	10 U	20 U	40 U	100 U	50 U	0.73 J	**12 J**	**8.2 J**
Toluene	5	2	0.74 J	10 U	20 U	40 U	100 U	50 U	1 U	4.7 J	20 U
Total Xylenes	5	120 U	300 U	150 U	**12 J**	40 U	30 U	60 U	3 U	120 U	**96 J**
Field Parameters											
Temperature (^{o}C)	-	-	-	-	-	-	-	-	-	-	-
Specific Conductance (mS/cm)	-	-	-	-	-	-	-	-	-	-	-
Dissolved Oxygen (mg/l)	-	-	-	-	-	-	-	-	-	-	-
pH (s.u.)	-	-	-	-	-	-	-	-	-	-	-
ORP (mV)	-	-	-	-	-	-	-	-	-	-	-
Turbidity (NTUs)	-	-	-	-	-	-	-	-	-	-	-
Purge Volume (gal)	-	-	-	-	-	-	-	-	-	-	-

Boxed value greater than the NYSDEC standards

Table 1

Summary of MW-09 and MW-09R Results
QLT Buffalo
Buffalo, New York

Well I.D.:		MW-09									
Event:		Baseline	Performance Monitoring (Post-Injection)								
Sample Date:		06/26/09	11/24/09 (b)	11/24/09 (b)	02/18/10 (b)	02/18/10 (b)	05/19/10 (b)	05/19/10 (b)	08/17/10 (b)	08/17/10 (b)	06/03/11 (b)
Parameters	**NSYDEC Standards (c)**										
Volatile Organic Compounds (µg/l)											
Acetone	50	-	-	-	**63**	**62**	35	35	31	33	14
Benzene	1	-	**2,200 D**	**2,000 D**	**1,500**	**1,800**	**2,400 D08**	**2,000 D08**	**730 D08**	**720 D08**	**420**
2-Butanone	50	-	-	-	7.8	7.6	5.4	5	5 J	5.6 J	1.7 J
Ethylbenzene	5	-	4.2 D	3.9 JD	3.8	4	4.9	3.6	3.1	2.7	0.77 J
Toluene	5	-	4 U	4 U	0.92 J	0.98 J	0.6 J	0.57 J	1 U	1 U	1 U
Total Xylenes	5	-	3.7 JD	3.2 JD	**6.1**	**6.2**	2.7	1.4 J	3	2.3	2 U
Field Parameters											
Temperature (^{o}C)	-	22.04	11.75	-	3.94	-	17.24	-	17.7	-	15.95
Specific Conductance (mS/cm)	-	1.74	11.7	-	9.31	-	5.64	-	5.98	-	4.63
Dissolved Oxygen (mg/l)	-	0.28	9.39	-	37.43	-	38.17	-	23.99	-	26.32
pH (s.u.)	-	6.89	13.40	-	13.67	-	12.96	-	12.67	-	10.54
ORP (mV)	-	-96	-25	-	-24	-	-58	-	30	-	64
Turbidity (NTUs)	-	9.6	69 (c)	-	136	-	18.2	-	87.1	-	39.2
Purge Volume (gal)	-	2	1	-	1	-	0.8	-	1	-	0.6

Boxed value greater than the NYSDEC standards

Table 1

Summary of MW-09 and MW-09R Results
QLT Buffalo
Buffalo, New York

Parameters	NSYDEC Standards (c)	MW-09 Performance Monitoring (Post-Injection) 06/03/11 (b)	MW-09 Performance Monitoring (Post-Injection) 09/06/11 (b)	MW-09 Performance Monitoring (Post-Injection) 09/06/11 (b)	MW-09 Performance Monitoring (Post-Injection) 11/06/11 (b)	MW-09 Performance Monitoring (Post-Injection) 11/06/11 (b)	MW-09R Performance Monitoring (Post-Injection) 2/8/2012 (b)	MW-09R Performance Monitoring (Post-Injection) 2/8/2012 (b)	MW-09R Performance Monitoring (Post-Injection) 2/14/2013 (g)	MW-09R Performance Monitoring (Post-Injection) 2/19/2014 (g)
Volatile Organic Compounds (µg/l)										
Acetone	50	13	25	28	-	-	250 U	250 U	800 U	-
Benzene	1	**430**	**1,400**	**970**	**2,100**	**2,100**	**6,100**	**5,000**	**6,800**	**4,000**
2-Butanone	50	1.7 J	3.5 J	3.9 J	-	-	250 U	250 U	800 UF	-
Ethylbenzene	5	0.79 J	1.4	1.4	2.1	2.2	**110**	**72**	**150**	80 U
Toluene	5	1 U	1 U	1 U	1 U	1 U	25 U	25 U	80 U	80 U
Total Xylenes	5	2 U	2 U	2 U	0.88 J	0.95 J	**37 J**	**31 J**	160 U	160 U
Field Parameters										
Temperature (^{o}C)	-	-	15.46	-	8.32	-	5.4	-	4.98	7.03
Specific Conductance (mS/cm)	-	-	4.38	-	4.35	-	3.25	-	3.79	3.31
Dissolved Oxygen (mg/l)	-	-	35.27	-	25.34	-	1.05	-	13.78	9.32
pH (s.u.)	-	-	10.06	-	11.79	-	7.07	-	6.92	7.47
ORP (mV)	-	-	32	-	103	-	36	-	-81	-86
Turbidity (NTUs)	-	-	18.9	-	15.2	-	49.2	-	105	-
Purge Volume (gal)	-	-	0.2	-	0.1	-	1.2	-	6.54	8.84

Boxed value greater than the NYSDEC standards

a/ I.D. = identification; NYSDEC = New York State Department of Environmental Conservation; µg/l = micrograms per liter; mg/l = milligrams per liter; ^{o}C = degrees Celcius; mS/cm = microSiemens per centimeter; s.u. = standard units; mV = millivolts; NTU = nephlometric turbidity units; gal = gallons; $^{o}/_{oo}$ = part per thousand; $\delta^{13}C$ = delta carbon-13; ND = not detected; '-' = standard not developed or constituent not analyzed.

b/ Sample and duplicate.

c/ NYSDEC Ambient Water Quality Standards and Guidance Values. Technical and Operational Guidance Series (1.1.1). June 1998 and as updated.

d/ Data Qualifiers:
U = constituent not detected at reported detection limit
J = estimated concentration
B = analyte detected in associated method blank
D, D08 = result from diluted aliquot
H = sample was analyzed after hold time
F = matrix spike or matrix spike duplicate exceeds control limits

e/ Results from sample collected by the NYSDEC.

f/ Supplemental Investigation

g/ Samples collected with a bailer.

Table 2

Summary of MW-03
Historical Results
QLT Buffalo
Buffalo, New York (a)

	Well I.D.:	MW-03									
	Event:	Quarterly Monitoring									
	Sample Date:	08/21/07	11/28/07 (b)	11/28/07 (b)	03/03/08 (b)	03/03/08 (b)	05/27/08 (b)	05/27/08 (b)	08/25/08 (b)	08/25/08 (b)	11/20/08
Parameters	**NSYDEC Values (c)**										
Volatile Organic Compounds (µg/l)											
Acetone	50	-	-	-	-	-	-	-	-	-	-
Benzene	1	**21**	**1,800**	**1,800 J**	**520**	**490**	**48**	**42**	**1,600**	**1,800**	**1,500**
2-Butanone	50	-	-	-	-	-	-	-	-	-	-
Ethylbenzene	5	**13**	**960**	**980 J**	**250**	**230**	**26**	**22**	**920**	**1,000**	**870**
Toluene	5	0.67 J	**100**	**110**	**20**	**19 J**	1 U	1 U	**72**	**73**	**53**
Total Xylenes	5	**8.5**	**850**	**870**	**190**	**170**	**7.7**	**6.9**	**650**	**710**	**530**
Field Parameters											
Temperature (^{o}C)	-	-	-	-	-	-	-	-	-	-	-
Specific Conductance (mS/cm)	-	-	-	-	-	-	-	-	-	-	-
Dissolved Oxygen (mg/l)	-	-	-	-	-	-	-	-	-	-	-
pH (s.u.)	-	-	-	-	-	-	-	-	-	-	-
ORP (mV)	-	-	-	-	-	-	-	-	-	-	-
Turbidity (NTUs)	-	-	-	-	-	-	-	-	-	-	-
Purge Volume (gal)	-	-	-	-	-	-	-	-	-	-	-

Boxed value greater than the NYSDEC values

Table 2

Summary of MW-03
Historical Results
QLT Buffalo
Buffalo, New York

Parameters	NSYDEC Values (c)	Well I.D.:									
		Supplemental				Performance Monitoring					
		Event: Investigation		Quarterly Monitoring		(Post-Injection)					
		Sample Date: 12/17/08 (b)	12/17/08 (b)	02/24/09	05/19/09	11/24/09	05/19/10	2/14/2013 (b,g)	2/14/2013 (b,g)	2/19/2014 (b,g)	2/19/2014 (b,g)
Volatile Organic Compounds (µg/l)											
Acetone	50	-	-	-	-	-	-	50 U	10 U	-	-
Benzene	1	**610**	**600**	**420**	**220**	**1,300 D**	**26**	**260**	**250**	**330**	**310**
2-Butanone	50	-	-	-	-	-	-	50 U	10 UF	-	-
Ethylbenzene	5	**340**	**330**	**240**	**44**	**620 D**	1.2	**40**	**36**	**45**	**43**
Toluene	5	**22**	**22**	1.6	1.9	**35 D**	1 U	5 U	1 U	5 U	2.4 J
Total Xylenes	5	**200 J**	**190**	**17**	**5.5**	**370 D**	2 U	10 U	2.5	3.8 J	3.2 J
Field Parameters											
Temperature (^{o}C)	-	-	-	-	-	13.61	18.41	11.47	-	10.01	-
Specific Conductance (mS/cm)	-	-	-	-	-	3.61	2.32	2.61	-	2.46	-
Dissolved Oxygen (mg/l)	-	-	-	-	-	2.64	0	7.91	-	8.38	-
pH (s.u.)	-	-	-	-	-	6.90	7.22	6.84	-	7.39	-
ORP (mV)	-	-	-	-	-	-21	-134	-82	-	-116	-
Turbidity (NTUs)	-	-	-	-	-	5.9	5.21	55.4	-	-	-
Purge Volume (gal)	-	-	-	-	-	2	0.6	5.28	-	6.96	-

Boxed value greater than the NYSDEC values

a/ I.D. = identification; NYSDEC = New York State Department of Environmental Conservation;
µg/l = micrograms per liter; ND = not detected; '-' indicates standard not developed or constituent not analyzed.
b/ Sample and duplicate.
c/ NYSDEC Ambient Water Quality Standards and Guidance Values. Technical and Operational Guidance Series (1.1.1).
June 1998 and as updated.
d/ Data Qualifiers:
U = constituent not detected at reported detection limit
J = estimated concentration
B = analyte detected in associated method blank
D, D08 = result from diluted aliquot
F = matrix spike or matrix spike duplicate exceeds control limits
e/ Results from sample collected by the NYSDEC.
f/ Samples collected during the February 14, 2013 sampling event were collected with a bailer.
g/ Samples collected with a bailer.

APPENDIX B

LABORATORY ANALYTICAL REPORT:
MW-03 & MW-09R

NOVEMBER 2018

ANALYTICAL REPORT

Lab Number:	L1848100
Client:	Benchmark & Turnkey Companies 2558 Hamburg Turnpike Suite 300 Buffalo, NY 14218
ATTN:	Tom Forbes
Phone:	(716) 856-0599
Project Name:	DUKE REALTY
Project Number:	0235-015-001
Report Date:	11/30/18

Certifications & Approvals: MA (M-MA086), NH NELAP (2064), CT (PH-0574), IL (200077), ME (MA00086), MD (348), NJ (MA935), NY (11148), NC (25700/666), PA (68-03671), RI (LAO00065), TX (T104704476), VT (VT-0935), VA (460195), USDA (Permit #P330-17-00196).

Eight Walkup Drive, Westborough, MA 01581-1019
508-898-9220 (Fax) 508-898-9193 800-624-9220 - www.alphalab.com

Project Name: DUKE REALTY
Project Number: 0235-015-001

Lab Number: L1848100
Report Date: 11/30/18

Alpha Sample ID	Client ID	Matrix	Sample Location	Collection Date/Time	Receive Date
L1848100-01	MW-33	WATER	BUFFALO	11/23/18 08:23	11/26/18
L1848100-02	MW-09R	WATER	BUFFALO	11/23/18 10:00	11/26/18
L1848100-03	TRIP BLANK	WATER	BUFFALO	11/23/18 00:00	11/26/18

Project Name: DUKE REALTY
Project Number: 0235-015-001

Lab Number: L1848100
Report Date: 11/30/18

Case Narrative

The samples were received in accordance with the Chain of Custody and no significant deviations were encountered during the preparation or analysis unless otherwise noted. Sample Receipt, Container Information, and the Chain of Custody are located at the back of the report.

Results contained within this report relate only to the samples submitted under this Alpha Lab Number and meet NELAP requirements for all NELAP accredited parameters unless otherwise noted in the following narrative. The data presented in this report is organized by parameter (i.e. VOC, SVOC, etc.). Sample specific Quality Control data (i.e. Surrogate Spike Recovery) is reported at the end of the target analyte list for each individual sample, followed by the Laboratory Batch Quality Control at the end of each parameter. Tentatively Identified Compounds (TICs), if requested, are reported for compounds identified to be present and are not part of the method/program Target Compound List, even if only a subset of the TCL are being reported. If a sample was re-analyzed or re-extracted due to a required quality control corrective action and if both sets of data are reported, the Laboratory ID of the re-analysis or re-extraction is designated with an "R" or "RE", respectively. When multiple Batch Quality Control elements are reported (e.g. more than one LCS), the associated samples for each element are noted in the grey shaded header line of each data table. Any Laboratory Batch, Sample Specific % recovery or RPD value that is outside the listed Acceptance Criteria is bolded in the report. All specific QC information is also incorporated in the Data Usability format of our Data Merger tool where it can be reviewed along with any associated usability implications. Soil/sediments, solids and tissues are reported on a dry weight basis unless otherwise noted. Definitions of all data qualifiers and acronyms used in this report are provided in the Glossary located at the back of the report.

In reference to questions H (CAM) or 4 (RCP) when "NO" is checked, the performance criteria for CAM and RCP methods allow for some quality control failures to occur and still be within method compliance. In these instances the specific failure is not narrated but noted in the associated QC table. The information is also incorporated in the Data Usability format of our Data Merger tool where it can be reviewed along with any associated usability implications.

Please see the associated ADEx data file for a comparison of laboratory reporting limits that were achieved with the regulatory Numerical Standards requested on the Chain of Custody.

HOLD POLICY
For samples submitted on hold, Alpha's policy is to hold samples (with the exception of Air canisters) free of charge for 21 calendar days from the date the project is completed. After 21 calendar days, we will dispose of all samples submitted including those put on hold unless you have contacted your Client Service Representative and made arrangements for Alpha to continue to hold the samples. Air canisters will be disposed after 3 business days from the date the project is completed.

Please contact Client Services at 800-624-9220 with any questions.

Project Name:	DUKE REALTY	**Lab Number:**	L1848100
Project Number:	0235-015-001	**Report Date:**	11/30/18

Case Narrative (continued)

Report Submission

All non-detect (ND) or estimated concentrations (J-qualified) have been quantitated to the limit noted in the MDL column.

I, the undersigned, attest under the pains and penalties of perjury that, to the best of my knowledge and belief and based upon my personal inquiry of those responsible for providing the information contained in this analytical report, such information is accurate and complete. This certificate of analysis is not complete unless this page accompanies any and all pages of this report.

Authorized Signature: Amita Naik

Title: Technical Director/Representative Date: 11/30/18

ORGANICS

VOLATILES

Project Name: DUKE REALTY
Project Number: 0235-015-001

Lab Number: L1848100
Report Date: 11/30/18

SAMPLE RESULTS

Lab ID: L1848100-01
Client ID: MW-33
Sample Location: BUFFALO

Date Collected: 11/23/18 08:23
Date Received: 11/26/18
Field Prep: Not Specified

Sample Depth:
Matrix: Water
Analytical Method: 1,8260C
Analytical Date: 11/29/18 13:56
Analyst: MKS

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor
Volatile Organics by GC/MS - Westborough Lab						
Benzene	100		ug/l	0.50	0.16	1
Toluene	ND		ug/l	2.5	0.70	1
Ethylbenzene	2.7		ug/l	2.5	0.70	1
Methyl tert butyl ether	ND		ug/l	2.5	0.70	1
p/m-Xylene	ND		ug/l	2.5	0.70	1
o-Xylene	2.9		ug/l	2.5	0.70	1
n-Butylbenzene	ND		ug/l	2.5	0.70	1
sec-Butylbenzene	ND		ug/l	2.5	0.70	1
tert-Butylbenzene	ND		ug/l	2.5	0.70	1
Isopropylbenzene	ND		ug/l	2.5	0.70	1
p-Isopropyltoluene	ND		ug/l	2.5	0.70	1
n-Propylbenzene	ND		ug/l	2.5	0.70	1
1,3,5-Trimethylbenzene	ND		ug/l	2.5	0.70	1
1,2,4-Trimethylbenzene	1.1	J	ug/l	2.5	0.70	1

Surrogate	% Recovery	Qualifier	Acceptance Criteria
1,2-Dichloroethane-d4	102		70-130
Toluene-d8	97		70-130
4-Bromofluorobenzene	95		70-130
Dibromofluoromethane	100		70-130

Project Name: DUKE REALTY
Project Number: 0235-015-001
Lab Number: L1848100
Report Date: 11/30/18

SAMPLE RESULTS

Lab ID: L1848100-02 D
Client ID: MW-09R
Sample Location: BUFFALO

Date Collected: 11/23/18 10:00
Date Received: 11/26/18
Field Prep: Not Specified

Sample Depth:
Matrix: Water
Analytical Method: 1,8260C
Analytical Date: 11/29/18 13:31
Analyst: NLK

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor
Volatile Organics by GC/MS - Westborough Lab						
Benzene	1700		ug/l	10	3.2	20
Toluene	ND		ug/l	50	14.	20
Ethylbenzene	ND		ug/l	50	14.	20
Methyl tert butyl ether	ND		ug/l	50	14.	20
p/m-Xylene	ND		ug/l	50	14.	20
o-Xylene	ND		ug/l	50	14.	20
n-Butylbenzene	ND		ug/l	50	14.	20
sec-Butylbenzene	ND		ug/l	50	14.	20
tert-Butylbenzene	ND		ug/l	50	14.	20
Isopropylbenzene	ND		ug/l	50	14.	20
p-Isopropyltoluene	ND		ug/l	50	14.	20
n-Propylbenzene	ND		ug/l	50	14.	20
1,3,5-Trimethylbenzene	ND		ug/l	50	14.	20
1,2,4-Trimethylbenzene	ND		ug/l	50	14.	20

Surrogate	% Recovery	Qualifier	Acceptance Criteria
1,2-Dichloroethane-d4	93		70-130
Toluene-d8	101		70-130
4-Bromofluorobenzene	97		70-130
Dibromofluoromethane	96		70-130

Project Name: DUKE REALTY
Project Number: 0235-015-001

Lab Number: L1848100
Report Date: 11/30/18

SAMPLE RESULTS

Lab ID: L1848100-03
Client ID: TRIP BLANK
Sample Location: BUFFALO

Date Collected: 11/23/18 00:00
Date Received: 11/26/18
Field Prep: Not Specified

Sample Depth:
Matrix: Water
Analytical Method: 1,8260C
Analytical Date: 11/29/18 13:05
Analyst: NLK

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor
Volatile Organics by GC/MS - Westborough Lab						
Benzene	ND		ug/l	0.50	0.16	1
Toluene	ND		ug/l	2.5	0.70	1
Ethylbenzene	ND		ug/l	2.5	0.70	1
Methyl tert butyl ether	ND		ug/l	2.5	0.70	1
p/m-Xylene	ND		ug/l	2.5	0.70	1
o-Xylene	ND		ug/l	2.5	0.70	1
n-Butylbenzene	ND		ug/l	2.5	0.70	1
sec-Butylbenzene	ND		ug/l	2.5	0.70	1
tert-Butylbenzene	ND		ug/l	2.5	0.70	1
Isopropylbenzene	ND		ug/l	2.5	0.70	1
p-Isopropyltoluene	ND		ug/l	2.5	0.70	1
n-Propylbenzene	ND		ug/l	2.5	0.70	1
1,3,5-Trimethylbenzene	ND		ug/l	2.5	0.70	1
1,2,4-Trimethylbenzene	ND		ug/l	2.5	0.70	1

Surrogate	% Recovery	Qualifier	Acceptance Criteria
1,2-Dichloroethane-d4	98		70-130
Toluene-d8	99		70-130
4-Bromofluorobenzene	96		70-130
Dibromofluoromethane	104		70-130

Project Name: DUKE REALTY
Project Number: 0235-015-001

Lab Number: L1848100
Report Date: 11/30/18

Method Blank Analysis
Batch Quality Control

Analytical Method: 1,8260C
Analytical Date: 11/29/18 08:28
Analyst: PD

Parameter	Result	Qualifier	Units	RL	MDL
Volatile Organics by GC/MS - Westborough Lab for sample(s): 01-03 Batch: WG1183933-5					
Benzene	ND		ug/l	0.50	0.16
Toluene	ND		ug/l	2.5	0.70
Ethylbenzene	ND		ug/l	2.5	0.70
Methyl tert butyl ether	ND		ug/l	2.5	0.70
p/m-Xylene	ND		ug/l	2.5	0.70
o-Xylene	ND		ug/l	2.5	0.70
n-Butylbenzene	ND		ug/l	2.5	0.70
sec-Butylbenzene	ND		ug/l	2.5	0.70
tert-Butylbenzene	ND		ug/l	2.5	0.70
Isopropylbenzene	ND		ug/l	2.5	0.70
p-Isopropyltoluene	ND		ug/l	2.5	0.70
n-Propylbenzene	ND		ug/l	2.5	0.70
1,3,5-Trimethylbenzene	ND		ug/l	2.5	0.70
1,2,4-Trimethylbenzene	ND		ug/l	2.5	0.70

Surrogate	%Recovery	Qualifier	Acceptance Criteria
1,2-Dichloroethane-d4	103		70-130
Toluene-d8	100		70-130
4-Bromofluorobenzene	97		70-130
Dibromofluoromethane	104		70-130

Lab Control Sample Analysis

Batch Quality Control

Project Name: DUKE REALTY

Project Number: 0235-015-001

Lab Number: L1848100

Report Date: 11/30/18

Parameter	LCS %Recovery	Qual	LCSD %Recovery	Qual	%Recovery Limits	RPD	Qual	RPD Limits
Volatile Organics by GC/MS - Westborough Lab Associated sample(s): 01-03 Batch: WG1183933-3 WG1183933-4								
Benzene	86		87		70-130	1		20
Toluene	95		94		70-130	1		20
Ethylbenzene	95		96		70-130	1		20
Methyl tert butyl ether	87		89		63-130	2		20
p/m-Xylene	100		100		70-130	0		20
o-Xylene	100		100		70-130	0		20
n-Butylbenzene	94		94		53-136	0		20
sec-Butylbenzene	96		94		70-130	2		20
tert-Butylbenzene	84		84		70-130	0		20
Isopropylbenzene	96		96		70-130	0		20
p-Isopropyltoluene	96		96		70-130	0		20
n-Propylbenzene	95		95		69-130	0		20
1,3,5-Trimethylbenzene	96		96		64-130	0		20
1,2,4-Trimethylbenzene	97		96		70-130	1		20

Surrogate	LCS %Recovery	Qual	LCSD %Recovery	Qual	Acceptance Criteria
1,2-Dichloroethane-d4	104		103		70-130
Toluene-d8	100		102		70-130
4-Bromofluorobenzene	96		95		70-130
Dibromofluoromethane	104		104		70-130

Project Name: DUKE REALTY
Project Number: 0235-015-001

Lab Number: L1848100
Report Date: 11/30/18

Sample Receipt and Container Information

Were project specific reporting limits specified? YES

Cooler Information

Cooler	Custody Seal
A	Absent

Container Information

Container ID	Container Type	Cooler	Initial pH	Final pH	Temp deg C	Pres	Seal	Frozen Date/Time	Analysis(*)
L1848100-01A	Vial HCl preserved	A	NA		2.0	Y	Absent		NYCP51-8260(14)
L1848100-01B	Vial HCl preserved	A	NA		2.0	Y	Absent		NYCP51-8260(14)
L1848100-01C	Vial HCl preserved	A	NA		2.0	Y	Absent		NYCP51-8260(14)
L1848100-02A	Vial HCl preserved	A	NA		2.0	Y	Absent		NYCP51-8260(14)
L1848100-02B	Vial HCl preserved	A	NA		2.0	Y	Absent		NYCP51-8260(14)
L1848100-02C	Vial HCl preserved	A	NA		2.0	Y	Absent		NYCP51-8260(14)
L1848100-03A	Vial HCl preserved	A	NA		2.0	Y	Absent		NYCP51-8260(14)
L1848100-03B	Vial HCl preserved	A	NA		2.0	Y	Absent		NYCP51-8260(14)

*Values in parentheses indicate holding time in days

Project Name:	DUKE REALTY	**Lab Number:**	L1848100
Project Number:	0235-015-001	**Report Date:**	11/30/18

GLOSSARY

Acronyms

EDL	- Estimated Detection Limit: This value represents the level to which target analyte concentrations are reported as estimated values, when those target analyte concentrations are quantified below the reporting limit (RL). The EDL includes any adjustments from dilutions, concentrations or moisture content, where applicable. The use of EDLs is specific to the analysis of PAHs using Solid-Phase Microextraction (SPME).
EMPC	- Estimated Maximum Possible Concentration: The concentration that results from the signal present at the retention time of an analyte when the ions meet all of the identification criteria except the ion abundance ratio criteria. An EMPC is a worst-case estimate of the concentration.
EPA	- Environmental Protection Agency.
LCS	- Laboratory Control Sample: A sample matrix, free from the analytes of interest, spiked with verified known amounts of analytes or a material containing known and verified amounts of analytes.
LCSD	- Laboratory Control Sample Duplicate: Refer to LCS.
LFB	- Laboratory Fortified Blank: A sample matrix, free from the analytes of interest, spiked with verified known amounts of analytes or a material containing known and verified amounts of analytes.
MDL	- Method Detection Limit: This value represents the level to which target analyte concentrations are reported as estimated values, when those target analyte concentrations are quantified below the reporting limit (RL). The MDL includes any adjustments from dilutions, concentrations or moisture content, where applicable.
MS	- Matrix Spike Sample: A sample prepared by adding a known mass of target analyte to a specified amount of matrix sample for which an independent estimate of target analyte concentration is available.
MSD	- Matrix Spike Sample Duplicate: Refer to MS.
NA	- Not Applicable.
NC	- Not Calculated: Term is utilized when one or more of the results utilized in the calculation are non-detect at the parameter's reporting unit.
NDPA/DPA	- N-Nitrosodiphenylamine/Diphenylamine.
NI	- Not Ignitable.
NP	- Non-Plastic: Term is utilized for the analysis of Atterberg Limits in soil.
RL	- Reporting Limit: The value at which an instrument can accurately measure an analyte at a specific concentration. The RL includes any adjustments from dilutions, concentrations or moisture content, where applicable.
RPD	- Relative Percent Difference: The results from matrix and/or matrix spike duplicates are primarily designed to assess the precision of analytical results in a given matrix and are expressed as relative percent difference (RPD). Values which are less than five times the reporting limit for any individual parameter are evaluated by utilizing the absolute difference between the values; although the RPD value will be provided in the report.
SRM	- Standard Reference Material: A reference sample of a known or certified value that is of the same or similar matrix as the associated field samples.
STLP	- Semi-dynamic Tank Leaching Procedure per EPA Method 1315.
TEF	- Toxic Equivalency Factors: The values assigned to each dioxin and furan to evaluate their toxicity relative to 2,3,7,8-TCDD.
TEQ	- Toxic Equivalent: The measure of a sample¿s toxicity derived by multiplying each dioxin and furan by its corresponding TEF and then summing the resulting values.
TIC	- Tentatively Identified Compound: A compound that has been identified to be present and is not part of the target compound list (TCL) for the method and/or program. All TICs are qualitatively identified and reported as estimated concentrations.

Footnotes

1	- The reference for this analyte should be considered modified since this analyte is absent from the target analyte list of the original method.

Terms

Analytical Method: Both the document from which the method originates and the analytical reference method. (Example: EPA 8260B is shown as 1,8260B.) The codes for the reference method documents are provided in the References section of the Addendum.

Final pH: As it pertains to Sample Receipt & Container Information section of the report, Final pH reflects pH of container determined after adjustment at the laboratory, if applicable. If no adjustment required, value reflects Initial pH.

Frozen Date/Time: With respect to Volatile Organics in soil, Frozen Date/Time reflects the date/time at which associated Reagent Water-preserved vials were initially frozen. Note: If frozen date/time is beyond 48 hours from sample collection, value will be reflected in 'bold'.

Initial pH: As it pertains to Sample Receipt & Container Information section of the report, Initial pH reflects pH of container determined upon receipt, if applicable.

Total: With respect to Organic analyses, a 'Total' result is defined as the summation of results for individual isomers or Aroclors. If a 'Total' result is requested, the results of its individual components will also be reported. This is applicable to 'Total' results for methods 8260, 8081 and 8082.

Report Format: DU Report with 'J' Qualifiers

Project Name:	DUKE REALTY	**Lab Number:**	L1848100
Project Number:	0235-015-001	**Report Date:**	11/30/18

Data Qualifiers

A - Spectra identified as "Aldol Condensation Product".

B - The analyte was detected above the reporting limit in the associated method blank. Flag only applies to associated field samples that have detectable concentrations of the analyte at less than ten times (10x) the concentration found in the blank. For MCP-related projects, flag only applies to associated field samples that have detectable concentrations of the analyte at less than ten times (10x) the concentration found in the blank. For DOD-related projects, flag only applies to associated field samples that have detectable concentrations of the analyte at less than ten times (10x) the concentration found in the blank AND the analyte was detected above one-half the reporting limit (or above the reporting limit for common lab contaminants) in the associated method blank. For NJ-Air-related projects, flag only applies to associated field samples that have detectable concentrations of the analyte above the reporting limit. For NJ-related projects (excluding Air), flag only applies to associated field samples that have detectable concentrations of the analyte, which was detected above the reporting limit in the associated method blank or above five times the reporting limit for common lab contaminants (Phthalates, Acetone, Methylene Chloride, 2-Butanone).

C - Co-elution: The target analyte co-elutes with a known lab standard (i.e. surrogate, internal standards, etc.) for co-extracted analyses.

D - Concentration of analyte was quantified from diluted analysis. Flag only applies to field samples that have detectable concentrations of the analyte.

E - Concentration of analyte exceeds the range of the calibration curve and/or linear range of the instrument.

G - The concentration may be biased high due to matrix interferences (i.e, co-elution) with non-target compound(s). The result should be considered estimated.

H - The analysis of pH was performed beyond the regulatory-required holding time of 15 minutes from the time of sample collection.

I - The lower value for the two columns has been reported due to obvious interference.

M - Reporting Limit (RL) exceeds the MCP CAM Reporting Limit for this analyte.

NJ - Presumptive evidence of compound. This represents an estimated concentration for Tentatively Identified Compounds (TICs), where the identification is based on a mass spectral library search.

P - The RPD between the results for the two columns exceeds the method-specified criteria.

Q - The quality control sample exceeds the associated acceptance criteria. For DOD-related projects, LCS and/or Continuing Calibration Standard exceedences are also qualified on all associated sample results. Note: This flag is not applicable for matrix spike recoveries when the sample concentration is greater than 4x the spike added or for batch duplicate RPD when the sample concentrations are less than 5x the RL. (Metals only.)

R - Analytical results are from sample re-analysis.

RE - Analytical results are from sample re-extraction.

S - Analytical results are from modified screening analysis.

J - Estimated value. The Target analyte concentration is below the quantitation limit (RL), but above the Method Detection Limit (MDL) or Estimated Detection Limit (EDL) for SPME-related analyses. This represents an estimated concentration for Tentatively Identified Compounds (TICs).

ND - Not detected at the method detection limit (MDL) for the sample, or estimated detection limit (EDL) for SPME-related analyses.

Report Format: DU Report with 'J' Qualifiers

Project Name:	DUKE REALTY	**Lab Number:**	L1848100
Project Number:	0235-015-001	**Report Date:**	11/30/18

REFERENCES

1 Test Methods for Evaluating Solid Waste: Physical/Chemical Methods. EPA SW-846. Third Edition. Updates I - IV, 2007.

LIMITATION OF LIABILITIES

Alpha Analytical performs services with reasonable care and diligence normal to the analytical testing laboratory industry. In the event of an error, the sole and exclusive responsibility of Alpha Analytical shall be to re-perform the work at it's own expense. In no event shall Alpha Analytical be held liable for any incidental, consequential or special damages, including but not limited to, damages in any way connected with the use of, interpretation of, information or analysis provided by Alpha Analytical.

We strongly urge our clients to comply with EPA protocol regarding sample volume, preservation, cooling, containers, sampling procedures, holding time and splitting of samples in the field.

Certification Information

The following analytes are not included in our Primary NELAP Scope of Accreditation:

Westborough Facility
EPA 624/624.1: m/p-xylene, o-xylene
EPA 8260C: NPW: 1,2,4,5-Tetramethylbenzene; 4-Ethyltoluene, Azobenzene; SCM: Iodomethane (methyl iodide), Methyl methacrylate, 1,2,4,5-Tetramethylbenzene; 4-Ethyltoluene.
EPA 8270D: NPW: Dimethylnaphthalene,1,4-Diphenylhydrazine; SCM: Dimethylnaphthalene,1,4-Diphenylhydrazine.

EPA 6860: SCM: Perchlorate

SM4500: NPW: Amenable Cyanide; SCM: Total Phosphorus, TKN, NO2, NO3.

Mansfield Facility
SM 2540D: TSS
EPA 8082A: NPW: PCB: 1, 5, 31, 87,101, 110, 141, 151, 153, 180, 183, 187.
EPA TO-15: Halothane, 2,4,4-Trimethyl-2-pentene, 2,4,4-Trimethyl-1-pentene, Thiophene, 2-Methylthiophene, 3-Methylthiophene, 2-Ethylthiophene, 1,2,3-Trimethylbenzene, Indan, Indene, 1,2,4,5-Tetramethylbenzene, Benzothiophene, 1-Methylnaphthalene.
Biological Tissue Matrix: EPA 3050B

The following analytes are included in our Massachusetts DEP Scope of Accreditation

Westborough Facility:

Drinking Water
EPA 300.0: Chloride, Nitrate-N, Fluoride, Sulfate; **EPA 353.2**: Nitrate-N, Nitrite-N; **SM4500NO3-F**: Nitrate-N, Nitrite-N; **SM4500F-C, SM4500CN-CE, EPA 180.1, SM2130B, SM4500Cl-D, SM2320B, SM2540C, SM4500H-B**
EPA 332: Perchlorate; **EPA 524.2:** THMs and VOCs; **EPA 504.1:** EDB, DBCP.
Microbiology: **SM9215B; SM9223-P/A, SM9223B-Colilert-QT,SM9222D**.

Non-Potable Water
SM4500H,B, EPA 120.1, SM2510B, SM2540C, SM2320B, SM4500CL-E, SM4500F-BC, SM4500NH3-BH: Ammonia-N and Kjeldahl-N, **EPA 350.1**: Ammonia-N, **LACHAT 10-107-06-1-B**: Ammonia-N, **EPA 351.1, SM4500NO3-F, EPA 353.2**: Nitrate-N**, SM4500P-E, SM4500P-B, E, SM4500SO4-E, SM5220D, EPA 410.4, SM5210B, SM5310C, SM4500CL-D, EPA 1664, EPA 420.1, SM4500-CN-CE, SM2540D, EPA 300: Chloride, Sulfate, Nitrate.**
EPA 624.1: Volatile Halocarbons & Aromatics,
EPA 608.3: Chlordane, Toxaphene, Aldrin, alpha-BHC, beta-BHC, gamma-BHC, delta-BHC, Dieldrin, DDD, DDE, DDT, Endosulfan I, Endosulfan II, Endosulfan sulfate, Endrin, Endrin Aldehyde, Heptachlor, Heptachlor Epoxide, PCBs
EPA 625.1: SVOC (Acid/Base/Neutral Extractables), **EPA 600/4-81-045**: PCB-Oil.
Microbiology: **SM9223B-Colilert-QT; Enterolert-QT, SM9221E, EPA 1600, EPA 1603.**

Mansfield Facility:

Drinking Water
EPA 200.7: Al, Ba, Cd, Cr, Cu, Fe, Mn, Ni, Na, Ag, Ca, Zn. **EPA 200.8:** Al, Sb, As, Ba, Be, Cd, Cr, Cu, Pb, Mn, Ni, Se, Ag, TL, Zn. **EPA 245.1** Hg.
EPA 522.

Non-Potable Water
EPA 200.7: Al, Sb, As, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Mo, Ni, K, Se, Ag, Na, Sr, TL, Ti, V, Zn.
EPA 200.8: Al, Sb, As, Be, Cd, Cr, Cu, Fe, Pb, Mn, Ni, K, Se, Ag, Na, TL, Zn.
EPA 245.1 Hg.
SM2340B

For a complete listing of analytes and methods, please contact your Alpha Project Manager.

NEW YORK CHAIN OF CUSTODY

ALPHA ANALYTICAL

Westborough, MA 01581
8 Walkup Dr.
TEL: 508-898-9220
FAX: 508-898-9193

Mansfield, MA 02048
320 Forbes Blvd
TEL: 508-822-9300
FAX: 508-822-3288

Service Centers
Mahwah, NJ 07430: 35 Whitney Rd, Suite 5
Albany, NY 12205: 14 Walker Way
Tonawanda, NY 14150: 275 Cooper Ave, Suite 105

Page 1 of 1

Date Rec'd in Lab: 11/27/18

ALPHA Job #: L1848100

Client Information
Client: BENCHMARK
Address: 2558 HAMBURG TURNPIKE
LACKAWANNA, NY 14218
Phone: 716-856-0599
Fax:
Email: TBechrendt@turnkeyllc.com

Project Information
Project Name: DUKE REALTY
Project Location: BUFFALO
Project #
(Use Project name as Project #) ☐
Project Manager: TOM FORBES
ALPHAQuote #:

Turn-Around Time
Standard ☒ Due Date:
Rush (only if pre approved) ☐ # of Days:

Deliverables
☐ ASP-A ☐ ASP-B
☐ EQuIS (1 File) ☐ EQuIS (4 File)
☐ Other

Regulatory Requirement
☐ NY TOGS ☐ NY Part 375
☐ AWQ Standards ☐ NY CP-51
☐ NY Restricted Use ☐ Other
☐ NY Unrestricted Use
☐ NYC Sewer Discharge

Billing Information
☐ Same as Client Info
PO #

Disposal Site Information
Please identify below location of applicable disposal facilities.
Disposal Facility:
☐ NJ ☐ NY
☐ Other:

These samples have been previously analyzed by Alpha ☐

Other project specific requirements/comments:

Please specify Metals or TAL.

ANALYSIS

Sample Filtration
☐ Done
☐ Lab to do
Preservation
☐ Lab to do
(Please Specify below)

ALPHA Lab ID (Lab Use Only)	Sample ID	Collection Date	Collection Time	Sample Matrix	Sampler's Initials	CP-51 VOCs	Total Bottle	Sample Specific Comments
48100 -01	MW-33	11/23/18	823	AQUA	CS	3		
-02	MW-09R	11/23/18	1000	AQUA	CS	3		
-03	TRIP BLANK	11/23/18		AQUA	CS	2		

Preservative Code:
A = None
B = HCl
C = HNO_3
D = H_2SO_4
E = NaOH
F = MeOH
G = $NaHSO_4$
H = $Na_2S_2O_3$
K/E = Zn Ac/NaOH
O = Other

Container Code
P = Plastic
A = Amber Glass
V = Vial
G = Glass
B = Bacteria Cup
C = Cube
O = Other
E = Encore
D = BOD Bottle

Westboro: Certification No: MA935
Mansfield: Certification No: MA015

Container Type	V							
Preservative	B							

Relinquished By:	Date/Time	Received By:	Date/Time
Chad M Schmidt	11/23/18 1017		11/26/18 @ 1615
AAL	11/26/18 @ 1700		11/27/18 02:15

Please print clearly, legibly and completely. Samples can not be logged in and turnaround time clock will not start until any ambiguities are resolved. BY EXECUTING THIS COC, THE CLIENT HAS READ AND AGREES TO BE BOUND BY ALPHA'S TERMS & CONDITIONS. (See reverse side.)

Form No: 01-25 HC (rev. 30-Sept-2013)

APPENDIX C

INSTITUTIONAL & ENGINEERING CONTROL (IC/EC) CERTIFICATION FORMS

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. C915194

Site Name Former Buffalo Service Station

Site Address: 249 West Genesee Street Zip Code: 14202
City/Town: Buffalo
County: Erie
Site Acreage: 4.900

Reporting Period: June 15, 2018 to June 15, 2019

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

Box 2

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

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

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

Signature of Owner, Remedial Party or Designated Representative Date

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. C915194 **Box 3**

Description of Institutional Controls

Parcel	Owner	Institutional Control
110.60-2-2.1	257 W. Genesee, LLC - c/o VEREIT, Inc.	Ground Water Use Restriction Soil Management Plan O&M Plan Landuse Restriction Site Management Plan

i) Use of groundwater for potable and non-potable purposes is prohibited.
ii) Implementation of Operation, Monitoring, and Maintenance Plan and Soil/Fill Management Plan.
iii) unrestricted or residential use is prohibited.

Box 4

Description of Engineering Controls

None Required

Not Applicable/No EC's

Box 5

Periodic Review Report (PRR) Certification Statements

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

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

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

YES	NO
☑	☐

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

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

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

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

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

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

YES	NO
☑	☐

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

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

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. C915194

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 James J. Vlahos (print name) at 2325 E. Camelback Rd, Suite 900, Phoenix, AZ 85016 (print business address)

am certifying as Authorized Officer for Owner (Owner or Remedial Party)

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

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

July 1, 2019
Date

IC/EC CERTIFICATIONS

Box 7

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 Thomas H. Forbes, P.E. at Benchmark Environmental Engineering & Science, PLLC 2558 Hamburg TurnPike, Buffalo, NY 14218,

print name — print business address

am certifying as a for the Owner

(Owner or Remedial Party)

STATE OF NEW YORK THOMAS H. FORBES No. 70950-1 LICENSED PROFESSIONAL ENGINEER

7-1-19

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

Stamp (Required for PE)

Date

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. C915195

Site Name Buffalo Urban Renewal Agency West Property

Site Address: 257 West Genesee Street Zip Code: 14202
City/Town: Buffalo
County: Erie
Site Acreage: 1.650

Reporting Period: June 15, 2018 to June 15, 2019

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

Box 2

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

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

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

Signature of Owner, Remedial Party or Designated Representative Date

SITE NO. C915195 **Box 3**

Description of Institutional Controls

Parcel	Owner	Institutional Control
110.60-2-2.1	257 W. Genesee, LLC - c/o VEREIT, Inc.	Ground Water Use Restriction Site Management Plan O&M Plan Landuse Restriction Soil Management Plan

i)Use of groundwater for potable and non-potable purposes is prohibited.
ii)Implementation of Operation, Monitoring, and Maintenance Plan and Soil/Fill Management Plan.
iii) Property shall remain as commercial/industrial use only

Box 4

Description of Engineering Controls

None Required

Not Applicable/No EC's

Box 5

Periodic Review Report (PRR) Certification Statements

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

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

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

YES	NO
☑	☐

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

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

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

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

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

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

YES	NO
☑	☐

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

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

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. C915195

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 James J. Vlahos (print name) at 2325 E. Camelback Rd., Suite 900, Phoenix, AZ 85016 (print business address)

am certifying as Authorized Officer for Owner (Owner or Remedial Party)

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

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

July 1, 2019
Date

IC/EC CERTIFICATIONS

Box 7

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 Thomas H. Forbes, P.E. at Benchmark Environmental Engineering & Science, PLLC 2558 Hamburg TurnPike, Buffalo, NY 14218,

print name — print business address

am certifying as a for the Owner

(Owner or Remedial Party)

STATE OF NEW YORK THOMAS H. FORBES No. 70950-1 LICENSED PROFESSIONAL ENGINEER

7-1-19

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

Stamp (Required for PE)

Date

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. C915203

Site Name 4 New Seventh Street Site

Site Address: 4 New Seventh Street Site Zip Code: 14202
City/Town: Buffalo
County: Erie
Site Acreage: 1.660

Reporting Period: June 15, 2018 to June 15, 2019

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

Box 2

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

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

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

Signature of Owner, Remedial Party or Designated Representative Date

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. C915203 **Box 3**

Description of Institutional Controls

Parcel	Owner	Institutional Control
110.60-2-2.1	257 W. Genesee, LLC - c/o VEREIT, Inc.	Ground Water Use Restriction Soil Management Plan Landuse Restriction Site Management Plan

i) Operation, Monitoring, and Maintenance Plan and Soil/Fill Management Plan
ii) Use of groundwater for potable and non-potable purposes is prohibited.
iii) unrestricted or residential use is prohibited.

Box 4

Description of Engineering Controls

None Required

Not Applicable/No EC's

Box 5

Periodic Review Report (PRR) Certification Statements

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

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

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

YES	NO
☑	☐

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

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

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

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

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

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

YES	NO
☑	☐

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

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

Signature of Owner, Remedial Party or Designated Representative	Date

IC CERTIFICATIONS
SITE NO. C915203

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 James J. Vlahos (print name) at 2325 E. Camelback Rd., Suite 900, Phoenix, AZ 85016 (print business address),

am certifying as Authorized Officer for Owner (Owner or Remedial Party)

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

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

July 1, 2019
Date

IC/EC CERTIFICATIONS

Box 7

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 Thomas H. Forbes, P.E. at Benchmark Environmental Engineering & Science, PLLC 2558 Hamburg TurnPike, Buffalo, NY 14218,

print name — print business address

am certifying as a for the Owner

(Owner or Remedial Party)

STATE OF NEW YORK THOMAS H. FORBES No. 70950-1 LICENSED PROFESSIONAL ENGINEER

7-1-19

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

Stamp (Required for PE)

Date

APPENDIX D

SITE PHOTO LOG

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

PHOTOGRAPHIC LOG

Client Name:	Site Location:	Project No.:
257 W. Genesee, LLC	257 W Genesee Street, LLC Site Buffalo, NY	

Photo No.	Date
1	06/17/19

Direction Photo Taken:
South

Description:
Visitor Surface Lot (looking South)

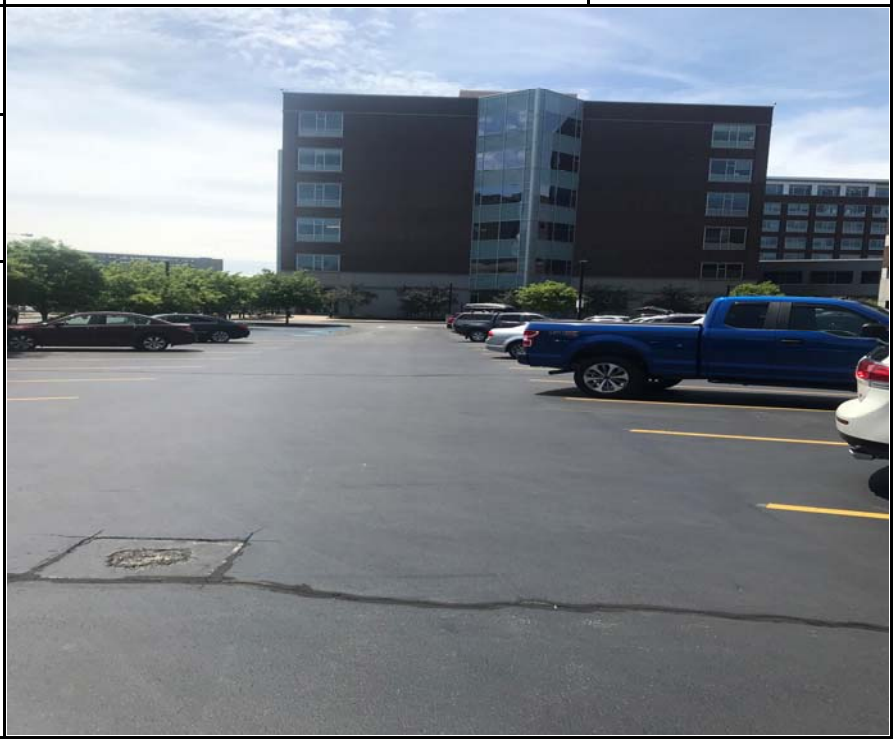
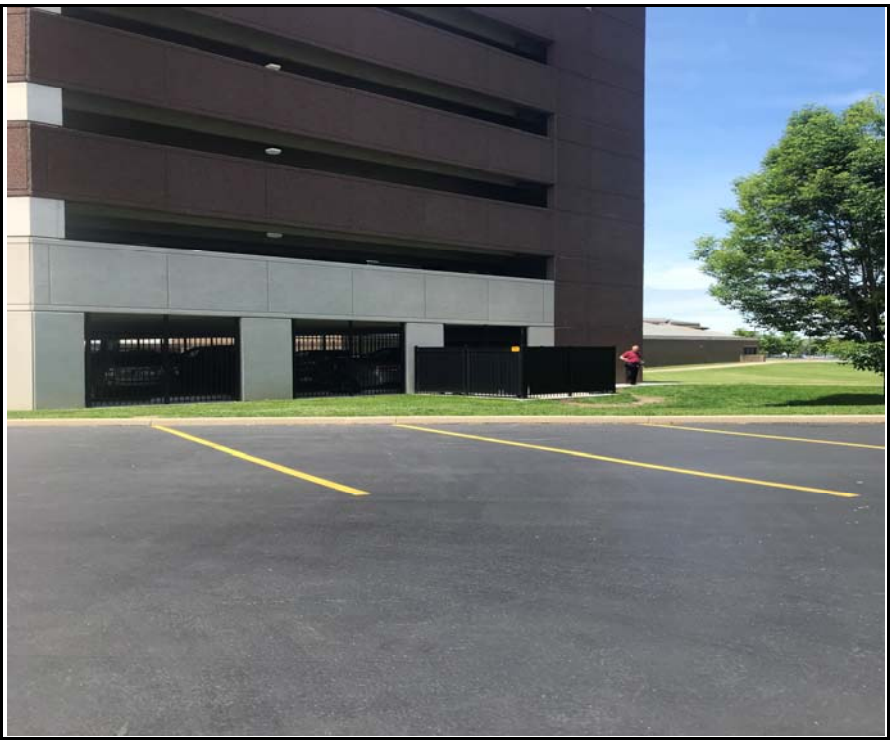


Photo No.	Date
2	06/17/19

Direction Photo Taken:
West

Description:
East Side of Parking Garage



Prepared By: THF

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

PHOTOGRAPHIC LOG

Client Name:	Site Location:	Project No.:
257 W. Genesee, LLC	257 W Genesee Street, LLC Site Buffalo, NY	

Photo No.	Date
3	06/17/19

Direction Photo Taken:
North

Description:
Visitor Parking Area (looking North)

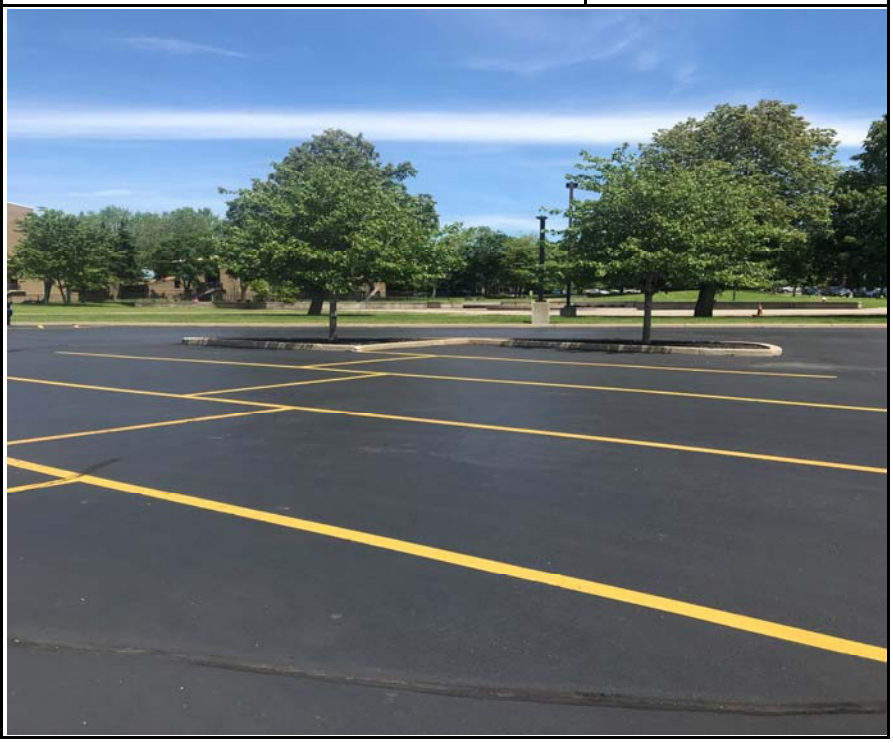
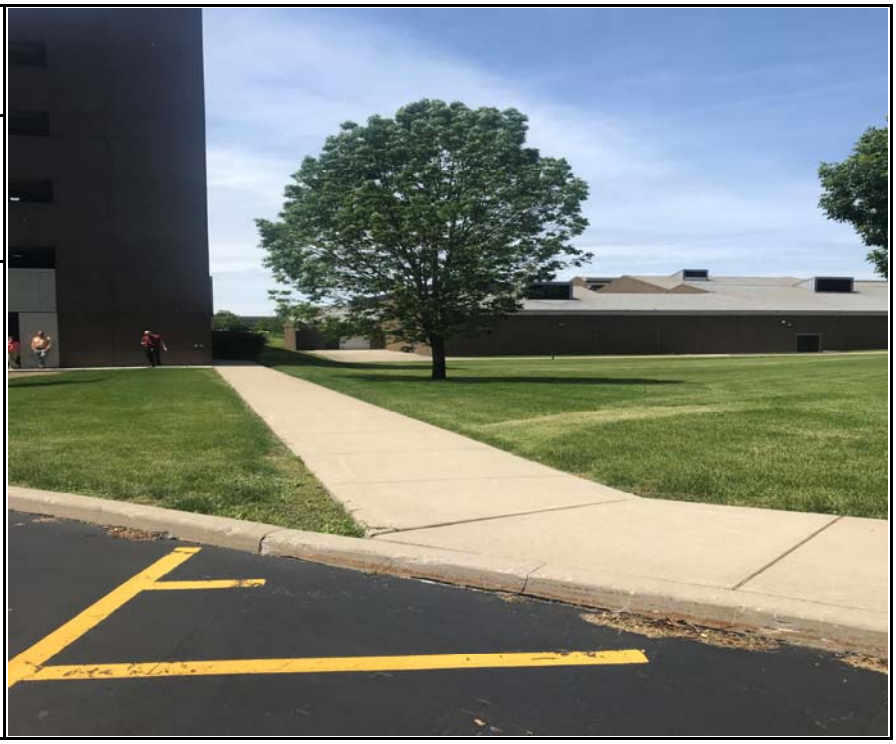


Photo No.	Date
4	06/17/19

Direction Photo Taken:
Southwest

Description:
Northern Property Boundary (looking southwest from Court Street)



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PHOTOGRAPHIC LOG

Client Name:	Site Location:	Project No.:
257 W. Genesee, LLC	257 W Genesee Street, LLC Site Buffalo, NY	

Photo No.	Date
5	06/17/19

Direction Photo Taken:
West

Description:
Drive between Garage and Building Complex, Looking West

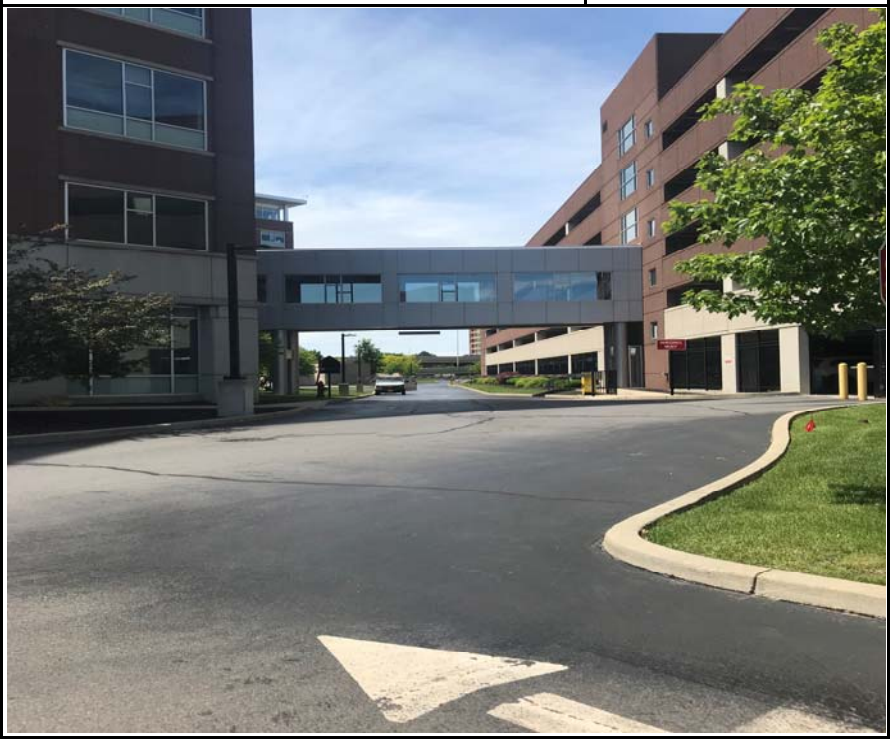
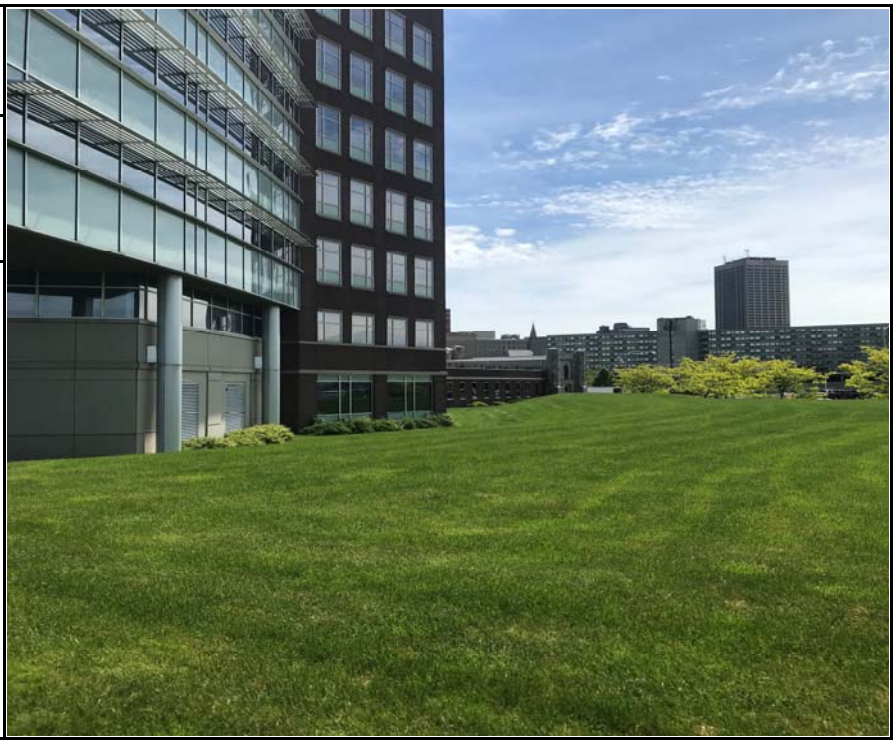


Photo No.	Date
6	06/17/19

Direction Photo Taken:
South

Description:
Berm area on 4th Street; looking south



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PHOTOGRAPHIC LOG

Client Name:	Site Location:	Project No.:
257 W. Genesee, LLC	257 W Genesee Street, LLC Site Buffalo, NY	

Photo No.	Date
7	06/17/19

Direction Photo Taken:
East

Description:
Site Conditions- Building façade looking east along W. Genesee St

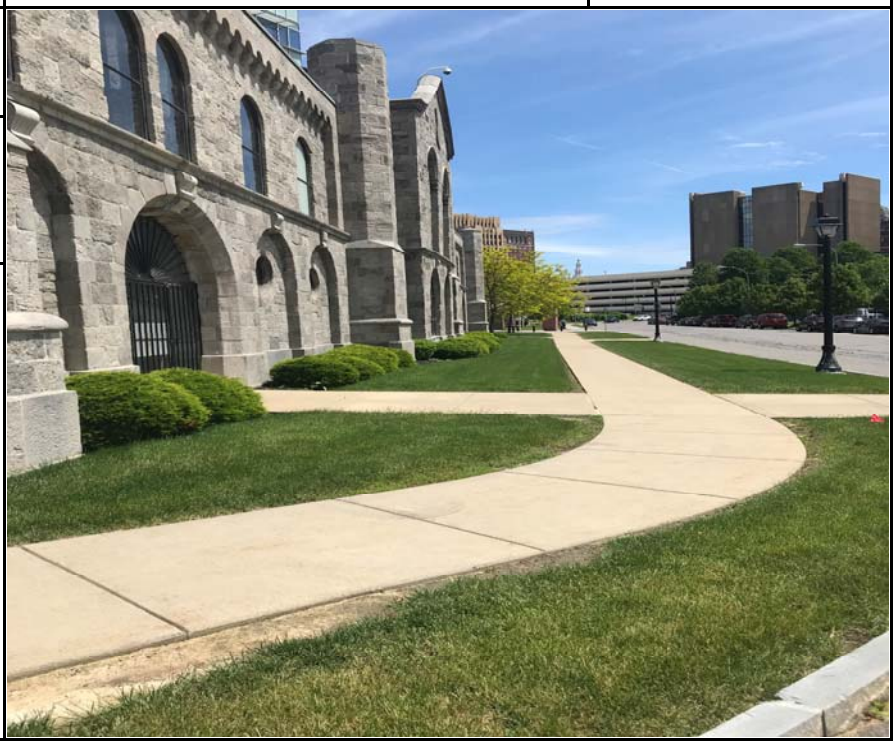
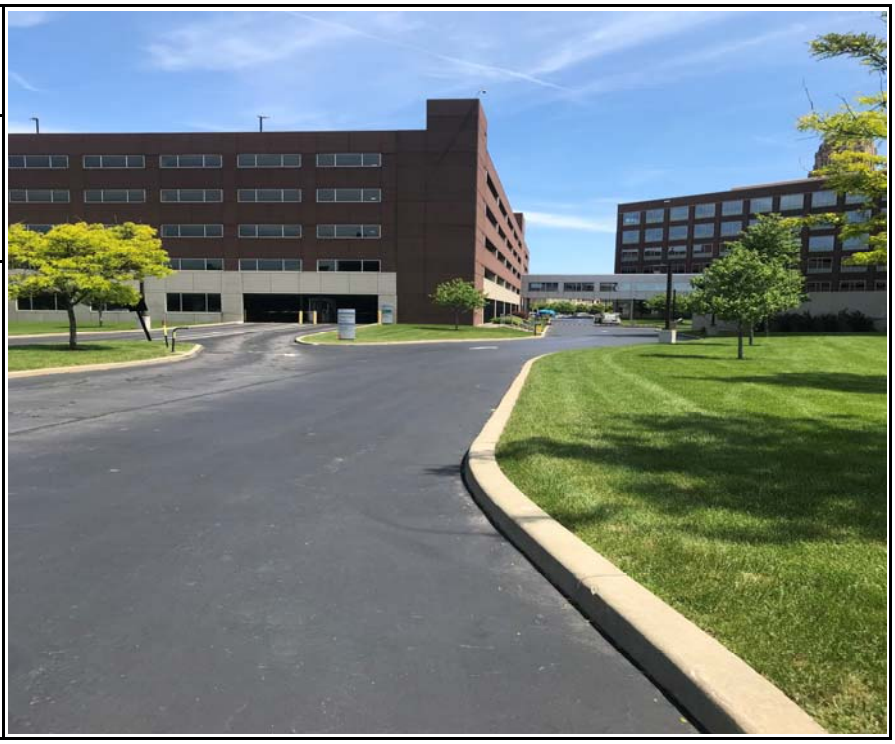


Photo No.	Date
8	06/17/19

Direction Photo Taken:
East

Description:
Entrance Drive from Fourth Street



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Client Name:	Site Location:	Project No.:
257 W. Genesee, LLC	257 W Genesee Street, LLC Site Buffalo, NY	

Photo No.	Date
9	06/17/19

Direction Photo Taken:
North-Northeast

Description:
Site Conditions - Detention Pond Area Looking N-NE

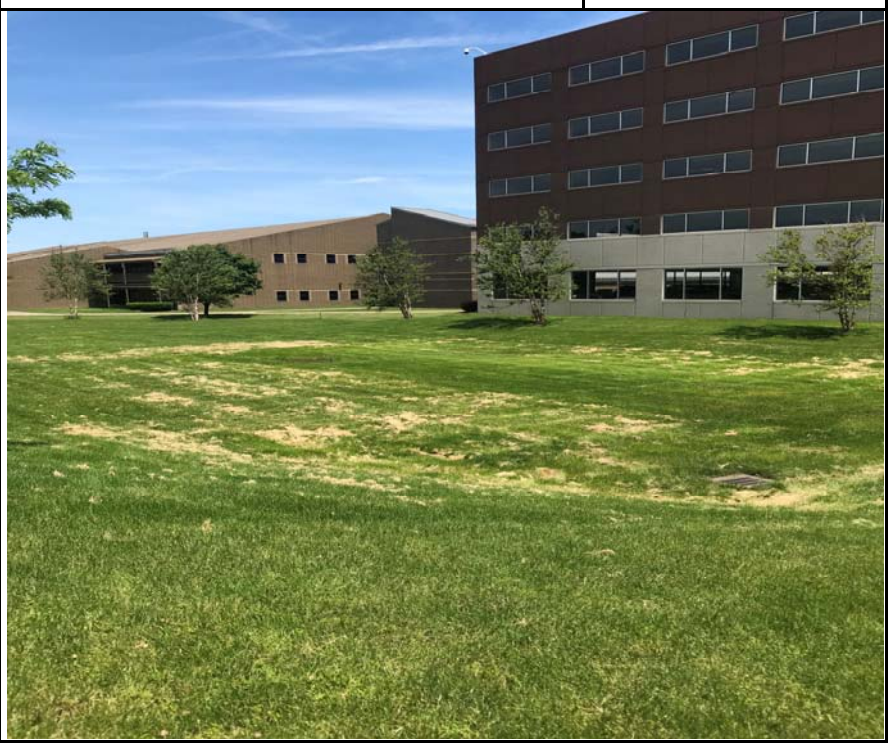
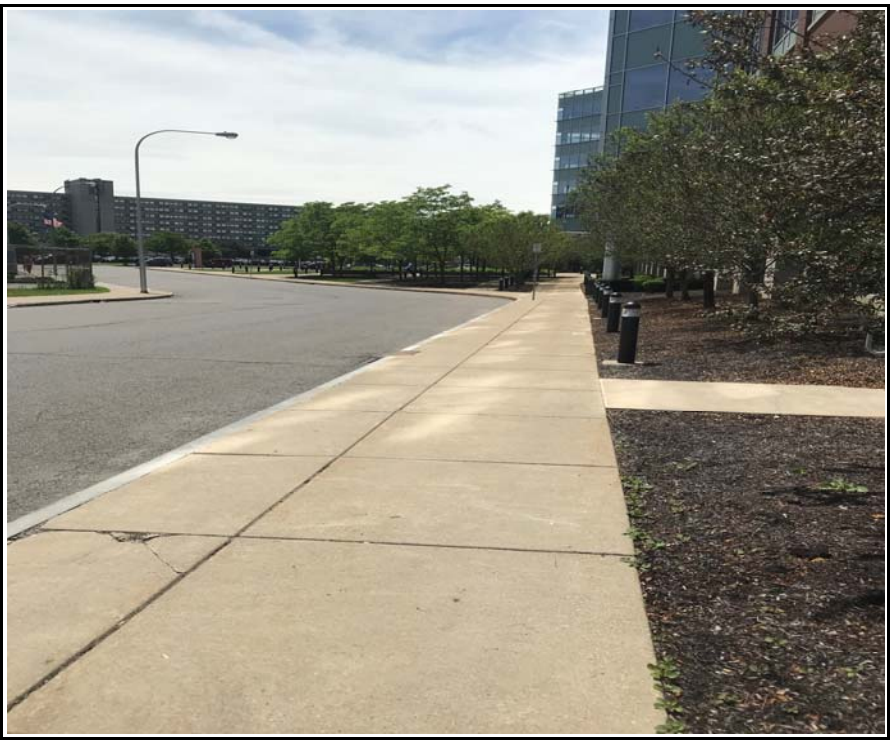


Photo No.	Date
10	06/17/19

Direction Photo Taken:
South

Description:
Site Conditions - Courtyard area on New 7th Street Looking South



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