Haley & Aldrich of New York
200 Town Centre Drive
Suite 2
Rochester, NY 14623
585.359.9000

13 February 2019
File No. 129356-004

Mr. David Szymanski
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 9
270 Michigan Avenue
Buffalo, New York 14203-2999

Subject: Hydro-Air Components, Inc. Property (Former Steelfields Area IV Parcel Site)
Brownfield Cleanup Program (BCP) Site #C915204
Site Management Periodic Review Report &
Institutional Controls/Engineering Controls Certification

Dear Mr. Szymanski:

On behalf of Hydro-Air Components, Inc. (Hydro-Air), Haley & Aldrich of New York (Haley & Aldrich) hereby submits this Site Management Periodic Review Report and Annual Institutional & Engineering Controls Certification for 2018 (2018 PRR) which was prepared in accordance with the New York State Department of Environmental Conservation (Department) approved Site Management Plan dated November 2007, as amended on 25 March 2014 to incorporate recommendations from the 2012 Corrective Measures Report (SMP).

The 2018 PRR is comprised of this cover letter and its five attachments. Each of the five attachments is a pre-printed form (developed by others) populated and compiled by Haley & Aldrich and Hydro-Air to document SMP activities implemented during the reporting period which commenced on 16 January 2018 and ended on 15 January 2019. The 2018 PRR also provides documentation of ongoing monitoring activities as they are related to the Department-approved Corrective Measures Program which was implemented in 2012 to address the site cover engineering control.

Haley & Aldrich conducted the annual site engineering controls inspection for the above referenced Site on 11 December 2018. Site monitoring activities were completed over the reporting period by Hydro-Air personnel and documentation of the monitoring activities is attached to and incorporated by reference in this 2018 PRR.

Please contact us if you have any questions or require additional information.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK

Thomas G. Robitaille
Senior Scientist

Glenn M. White, CHMM
Associate | Senior Project Manager

Cc: Rob Daigler, Hydro-Air Components Inc.
Maurice Moore, NYSDEC
Zwelonke Ushe, NYSDOH
Thomas F. Walsh, Esq., Barclay Damon, LLP

Attachments:

Attachment 1	New York State Department of Environmental Conservation Site Management Periodic Review Report Notice Institutional and Engineering Control Certification
Attachment 2	Environmental Inspection Form Operation, Monitoring, & Maintenance Work Plan
Attachment 3	Annual Operation & Maintenance Active Sub-Slab Depressurization System Certification Checklist
Attachment 4	Corrective Action Certification Operation, Monitoring, & Maintenance Work Plan
Attachment 5	ORC Well Annual Inspection Form

G:\129356 - HydroAir (2017--)\004_2018-2019\PRR and Annual Cert 2018\2019-0213-Annual Review and Cert Cover ltr_F.docx

New York State Department of Environmental Conservation
Site Management Periodic Review Report Notice
Institutional and Engineering Control Certification Form

Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form

Site Details **Box 1**

Site No. **C915204**

Site Name Steelfields Area IV

Site Address: 100 Rittling Blvd. Zip Code: 14220
City/Town: Buffalo
County: Erie
Site Acreage: 30.9

Reporting Period: January 16, 2018 to January 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? 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. C915204 **Box 3**

Description of Institutional Controls

Parcel	Owner	Institutional Control
132.12-1-9.121	Hydro-Air Components, Inc.	Site Management Plan Ground Water Use Restriction Land Use Restriction Soil Management Plan

i) until the remedial goals for the Controlled Property are attained or deemed complete by the Department, the Department-approved Site Management Plan (SMP) for the implemented remedy must be adhered to.

ii) a soil cover system and vegetation in accordance with the Soil/Fill Management Plan in the SMP shall be maintained over undeveloped portions of the Controlled Property.

iii) an active subslab depressurization system (ASD) to eliminate potential soil vapor intrusion shall be installed, operated and maintained in all new buildings and building additions in accordance with the standards and procedures specified in the SMP, and the ASD already installed in the existing building shall continue to be operated and maintained in accordance with the SMP, unless the Department determines that the ASD is not necessary based on the results of a Department-approved evaluation of potential sub-slab vapor impacts.

iv) the groundwater beneath the Controlled Property cannot be used as a potable water source or for any other use without prior written permission of the Department.

v) groundwater monitoring in accordance with the SMP shall continue until the Department determines that continued monitoring is unnecessary.

vi) the in-situ treatment of residual contamination in native soils using oxygen release compounds (ORC) shall be maintained and monitored in accordance with the SMP until the Department determines that continued maintenance and monitoring of ORC is unnecessary.

vii) in areas of the Controlled Property with known groundwater impacts, storm water injection (drywells) will be prohibited and storm water conveyance pipes will be required to have gasketed joints for water tightness to prevent the infiltration of impacted groundwater into the collection system.

Box 4

Description of Engineering Controls

Parcel	Engineering Control
132.12-1-9.121	Cover System Vapor Mitigation Gasketed Stormwater Conveyance Piping ORC In-situ Treatment Groundwater Monitoring

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 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. C915204

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 Robert Dayler at Hydro-Air Components, Inc,
print name print business address

am certifying as V.P. Finance (Owner or Remedial Party)

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

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

2/12/2019
Date

IC/EC CERTIFICATIONS

Box 7

Qualified Environmental Professional 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 Glenn M. White, CHMM at Haley & Aldrich of New York, 200 Town Centre Drive Rochester, NY 14623,
print name print business address

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

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

Stamp (Required for PE)

Date 2-13-2019

Environmental Inspection Form
Operation, Monitoring, & Maintenance Work Plan

Environmental Inspection Form
Operation, Monitoring, & Maintenance Work Plan

Property Name: Hydro-Air Components (Steelfields Area IV) Project No.: 129356-004

Client: Hydro-Air Components, Inc.

Property Address: 100 Rittling Blvd. City, State: Buffalo, NY Zip Code: 14220

Property ID: 14020013212000001009121 Section: 132.12 Block: 1 Lot(s): 9.121

Preparer's Name: Glenn White Date/Time: February 2019

CERTIFICATION

The results of this inspection were discussed with the owner and/or owner's representative. Any corrective actions required have been identified and noted in this report, and a supplemental Corrective Actions Form has been completed. Proper implementation of these corrective actions have been discussed with the owner, agreed upon, and scheduled.

Preparer Glenn White, Haley & Aldrich of NY **Date:** 2/5/19

Signature:

Next Scheduled Inspection (date): 12/2019

Final Surface Cover / Vegetation

In accordance with the Soil/Fill Management Plan, vegetative or other (eg. Asphalt, buildings, concrete) surface coverage over the entire redeveloped parcel is required by the developer or owner as a pre-condition of occupancy. The following documents the condition of the above.

1. Final Cover is in Place and in good condition?	☒ yes	☐ no	☐ N/A
Cover consists of (mainly): Field grasses, building, asphalt parking lot and asphalt and gravel drives. See Attachment to Page 1 of 3.			
2. Evidence of erosion?	☐ yes	☒ no	☐ N/A
3. Cracks visible in pavement?	☐ yes	☒ no	☐ N/A
4. Evidence of distressed vegetation/turf?	☐ yes	☒ no	☐ N/A
5. Evidence of unintended traffic and/or rutting?	☒ yes	☐ no	☐ N/A
6. Evidence of uneven settlement and/or ponding?	☐ yes	☒ no	☐ N/A
7. Damage to any surface coverage?	☐ yes	☒ no	☐ N/A

If yes to any question above, please provide more information below.

During the 2018 northern pond embayment cleanout activities conducted in December 2018 (see attachment to page 1 of 3), some minor rutting was caused by heavy equipment in the vegetated (grass) areas surrounding the pond. It was agreed upon that restoration of these areas would be conducted in the Spring of 2019, at the start of the growing season. The rutting was temporarily graded off. The site cover/ fill was not compromised and the rutting was limited only to the top few inches of the cover.

Attachment to Page 1 of 3

Coverage in Western Grass Area

Ponding had been observed after installation of the soil cover in 2007. As requested by NYSDEC, French drains were installed in May 2008 and appear to have improved conditions. Ponding water was not observed during the annual inspection nor was it reported by HydroAir throughout the year. Some wetland vegetation continues to grow in the western interior of the site as evidenced in photographs taken in the 2018. (See attached photos). Over the prior few years (2016-2017), HydroAir had observed after-hours trespassing of ATVs into the western grass areas of the site (utilizing site to access the adjacent railroad right-of-way). A breach in the perimeter fence shared with the railroad corridor was also observed and subsequently repaired. In June 2017, HydroAir security confronted the trespassers and after discussions with these individuals no further trespassing has been observed. No evidence of trespassing and/or rutting was observed during the December 2018 site visit, and HydroAir remains committed to prevent trespassing and potential disturbances to the site vegetative cover. If additional trespassing is observed, HydroAir will consider modifications to site controls and/or security measures, (for example, placing cement blocks to prevent vehicle access to these areas).

Northern Loading Dock

Subsequent to corrective measures that were put into place on 1 December 2012 (per the Corrective Measures Work Plan, approved 29 December 2011 by the Department), water has not accumulated in the northeastern loading dock area. The reconfiguration of the loading dock pump system (setting to automatic pumping and raising the float set-point) enabled sufficient pumping to maintain dry conditions and has sufficiently prevented the surfacing of groundwater in the area. HydroAir has continued to monitor the efficacy of these controls regularly throughout 2018.

Gravel Cover Areas

Prior to 2012, evidence of surfacing groundwater in the gravel cover areas on the northern end of the site was evident. This site cover system engineering control was enhanced in 2012; additional gravel (9 to 11 inches) was added to the northern portion of the access road to inhibit the surfacing of groundwater in the area. HydroAir has monitored the continual efficacy of the gravel cover area throughout 2018 and has not observed any evidence of groundwater surfacing in these areas.

Stormwater Retention Pond – Northern Embayment

A contractor was mobilized to the site between 10-11 December 2018 to clean out an accumulation of high pH material that had precipitated into the northern embayment of the stormwater retention pond. As required, the week prior to this work the NYSDEC was notified of the cleanout activities. Vegetative growth (phragmites) was removed with heavy equipment and staged on plastic sheeting adjacent to the pond to drain excess water back into the pond. The drained vegetation was then placed into a roll off container and prepped for removal to a NYSDEC-permitted landfill. The following day, the contractor pumped excess water from the northern embayment back into the main pond. After the water was sufficiently drawn down, a vacuum truck was mobilized to the site to clear the accumulated material from the base of the embayment. The precipitated material was estimated to be approximately 1 to 1 ½ feet deep. Approximately 4 tons were removed from the embayment and this material was also then transported to a NYSDEC-permitted landfill.

September 2018 – View from eastern side of building roof, looking southeast.

October 2018 – View from northeastern corner of the site looking southwest towards stormwater retention pond.

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September 2018 – View from eastern side of building roof, looking at stormwater retention pond.

October 2018 – View from access road west of plant building looking west towards western vegetated portions of the site.

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December 2018 – View from northwestern corner of site building looking south along snow covered site access road.

September 2018 – View from southern side of plant roof looking southeast towards parking lot areas.

December 2018 – View looking east towards stormwater pond northern embayment. (Embayment being cleaned out).

December 2018 – View looking south towards northern embayment following cleanout activities.

Property Security & Access

In accordance with the Soil/Fill Management Plan, fencing is required to restrict access in all undeveloped areas and as necessary in redeveloped areas. In addition, all fencing around undeveloped areas will be posted with "No Trespassing" signs.

1. Is access controlled by perimeter fencing?	☐ yes	☒ no	☐ N/A
If not, please note: Site is partially fenced.			
2. Is fencing in need of repair?	☐ yes	☒ no	☐ N/A
3. Area access gates in working order?	☐ yes	☐ no	☒ N/A
4. Sufficient signage posted (No Trespassing)?	☒ yes	☐ no	☐ N/A
5. Has there been any noted or reported trespassing?	☐ yes	☒ no	☐ N/A

Please note any irregularities/ changes in site access and security:

Property Use Changes / Site Development

Has the property usage changed, or site been redeveloped since the last inspection?

☐ yes ☒ no ☐ N/A

If so, please list with date: Property use has not changed since 2006 when Hydro-Air first occupied the building.

Active Sub-Slab Depressurization System (ASD)

Is there an ASD present on-site?

☒ yes ☐ no ☐ N/A

If yes, is it currently operating?

☒ yes ☐ no ☐ N/A

Is the ASD annual inspection checklist completed and enclosed?

☒ yes ☐ no ☐ N/A

Environmental Inspection Form
Operation, Monitoring, & Maintenance Work Plan

ORC Well Monitoring and Maintenance

Is there ORC mitigation present on-site?

☒ yes ☐ no ☐ N/A

Are the wells currently intact and operational?

☒ yes ☐ no ☐ N/A

Has regular maintenance and monitoring been documented and enclosed or referenced?

☒ yes ☐ no ☐ N/A

See attachment to page 3 of 3 for further explanation.

Long-Term Ground Water Monitoring

Is there a plan in place and currently being followed?

☒ yes ☐ no ☐ N/A

Are the wells currently intact and operational?

☒ yes ☐ no ☐ N/A

When was the most recent sampling event report and submittal? Date: Report on February 13, 2018 (for 2017 sampling event). The most recent sampling event took place during June 2018 and the 2018 report is currently being prepared.

When is the next projected sampling event? Date: June 2019

New Information

Has any new information been brought to the owner/engineer's attention regarding any and/or all engineering and institutional controls and their operation and effectiveness?

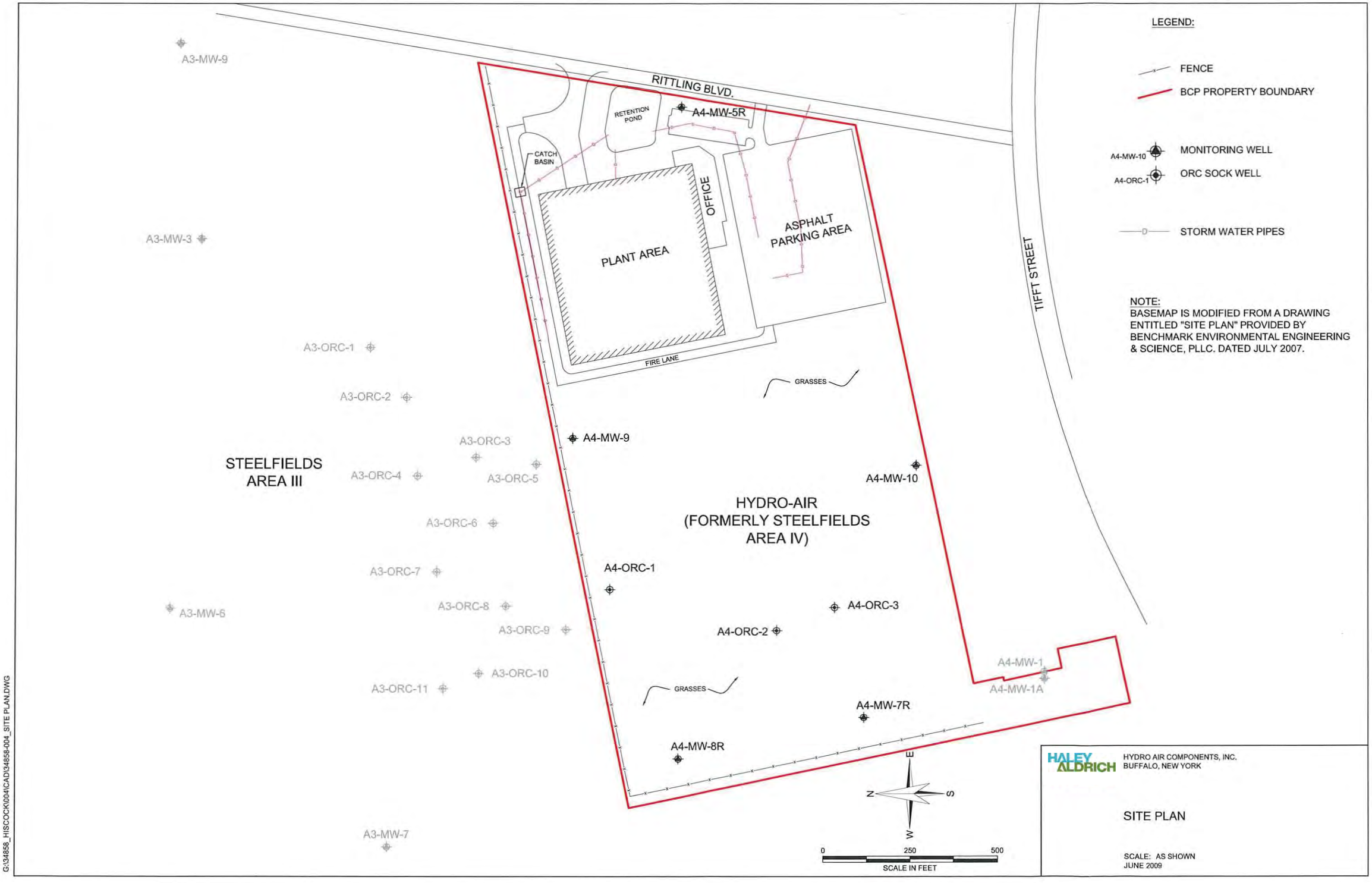
☐ yes ☒ no ☐ N/A

Comments:

This space for Notes and Comments

Please include the following Attachments:

1. Site Sketch (Attached)
2. Photographs (Attached)



HALEY ALDRICH

HYDRO AIR COMPONENTS, INC.
BUFFALO, NEW YORK

SITE PLAN

SCALE: AS SHOWN
JUNE 2009

G:\34858_HISCOCK\0004\CAD\34858-004_SITE PLAN.DWG

Attachment to Page 3 of 3 – ORC Well Monitoring and Maintenance

ORC well monitoring and maintenance activities were completed in accordance with the NYSDEC approved Site Management Plan dated November 2007. Low pH conditions in each of the ORC wells have been documented during each monitoring event completed to date. The low pH conditions likely inhibit the effectiveness of the ORC. The ORC socks were most recently replaced in January 2018. ORC socks had been scheduled to be replaced in June 2018, but replacement socks were not available during the field representatives (TestAmerica) visit to the site. Subsequently, the individual whom had been servicing the socks retired and, inadvertently, the regular replacement of the socks did not occur. TestAmerica was contacted in January 2019 and a new individual completed this maintenance activity on 28 January 2019. Going forward the six-month changeout schedule will be resumed.

Annual Operation & Maintenance
Active Sub-Slab Depressurization System
Certification Checklist

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SCIENCE, PLLC

Annual Operation & Maintenance
Active Sub-Slab Depressurization System
Certification Checklist

Project Name:	Hydro-Air Components, Inc.	Project No.:	129356-004
Project Location:	Buffalo, NY	Client:	
Preparer's Name:	Dale Barto	Date/Time:	January 2019

Notes:

System Information

Has monthly system inspection been completed regularly?	☒ yes	☐ no
Are last 11 inspection logs attached for the past 12 months?	☒ yes	☐ no

Inspection logs for the reporting period (to date - Jan 2018 through Dec 2018 logs) are attached.

What is the current Vacuum reading? See Logs.

System Updates, Maintenance, Part Replacement

Air tubing connected to the magnahelic gauge located in the NE corner of building was replaced in March 2018 after it was discovered the previously installed tubing had a leak, leading to lower readings.

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Annual Operation & Maintenance
Active Sub-Slab Depressurization System
Certification Checklist

Change in Occupancy / Use of Space:

Please indicate general use of floor space? Manufacturing & Storage

Has this general use changed in the past year? ☐ yes ☒ no

If yes, please explain:

Building Renovations:

Have any building renovations taken place in the last month? ☐ yes ☒ no

If yes, please provide more information below, and sketch any basement floor plan modifications on the floor plan sketch below.

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☒ yes ☐ no

If so, please list with date:

Air tubing at the Magnahelic gauge located in the NE corner of building was replaced in March.

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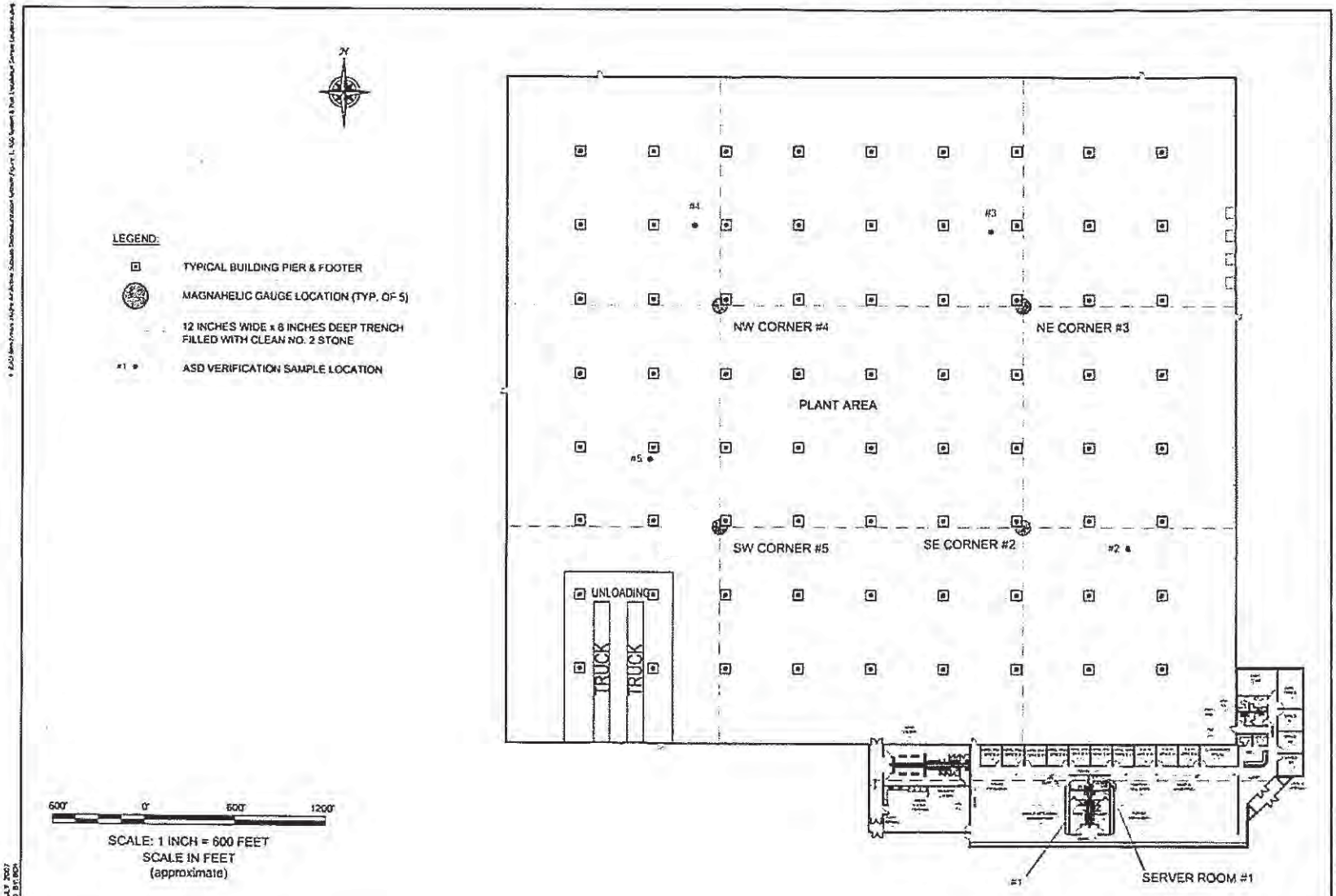
Annual Operation & Maintenance
Active Sub-Slab Depressurization System
Certification Checklist

Floor Plan Sketch:

Draw a plan view sketch of the basement of the building. Indicate Sub-Slab Depressurization system location. Please also note and include, any alterations to the system, locations of visible cracks and/or repairs needed, and changes or alterations to the usage of this space.

SEE ATTACHED FIGURE

*Note that building is slab-on-grade construction



BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC
726 EXCHANGE STREET SUITE #24 BUFFALO, NEW YORK 14210 (716) 856-0599

JOB NO.: 0107-002-300

ASD SYSTEM & POST-INSTALLATION SAMPLE LOCATIONS

HYDRO-AIR SITE
BUFFALO, NEW YORK

PREPARED FOR
HYDRO-AIR COMPONENTS, INC.

FIGURE 1

Monthly Operation & Maintenance Log
Active Sub-slab Depressurization System

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Dale A Barte | Date/Time: 1/30/2018 9:30 AM

Notes:

Monthly Operating Status:

System(s) currently running? ☑ yes ☐ no

Has the system been off-line in the past month? ☐ yes ☑ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 1.14

Visual Inspection:

Any piping disconnected?	☐ yes	☑ no
Any cracks visible in piping?	☐ yes	☑ no
Any new cracks visible in slab floor?	☐ yes	☑ no
Magnehelic guage reading 0?	☐ yes	☑ no

If yes to any question above, please provide more information below.

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Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Change in Occupancy / Use of Space:

Please indicate general use of floor space? Manufacturing

Has this general use changed in the past month? ☐ yes ☑ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☑ no

If so, please list with date:

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Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Dale A Barto | Date/Time: 2/28/2018 8:35 AM

Notes:

Monthly Operating Status:

System(s) currently running? ☑ yes ☐ no

Has the system been off-line in the past month? ☐ yes ☑ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 1.14

Visual Inspection:

Any piping disconnected?	☐ yes	☑ no
Any cracks visible in piping?	☐ yes	☑ no
Any new cracks visible in slab floor?	☐ yes	☑ no
Magnehelic guage reading 0?	☐ yes	☑ no

If yes to any question above, please provide more information below.

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Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Change in Occupancy / Use of Space:

Please indicate general use of floor space? Manufacturing

Has this general use changed in the past month? ☐ yes ☑ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☑ no

If so, please list with date:

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Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Dale A Barto | Date/Time: 3/26/18 9:00 AM

Notes:

Monthly Operating Status:

System(s) currently running? ☑ yes ☐ no

Has the system been off-line in the past month? ☐ yes ☑ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 1.09

Visual Inspection:

Any piping disconnected?	☐ yes	☑ no
Any cracks visible in piping?	☐ yes	☑ no
Any new cracks visible in slab floor?	☐ yes	☑ no
Magnehelic guage reading 0?	☐ yes	☑ no

If yes to any question above, please provide more information below.

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Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Change in Occupancy / Use of Space:

Please indicate general use of floor space? Manufacturing

Has this general use changed in the past month? ☐ yes ☑ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☑ no

If so, please list with date:

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ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Dale A Barto | Date/Time: 4/3/18 9:00 AM

Notes:

Monthly Operating Status:

System(s) currently running? ☑ yes ☐ no

Has the system been off-line in the past month? ☐ yes ☑ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 1.43

Visual Inspection:

Any piping disconnected?	☐ yes	☑ no
Any cracks visible in piping?	☐ yes	☑ no
Any new cracks visible in slab floor?	☐ yes	☑ no
Magnehelic guage reading 0?	☐ yes	☑ no

If yes to any question above, please provide more information below.

BENCHMARK
ENVIRONMENTAL
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Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Change in Occupancy / Use of Space:

Please indicate general use of floor space? Manufacturing

Has this general use changed in the past month? ☐ yes ☑ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☑ no

If so, please list with date:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Dale A Barto | Date/Time: 5/30/18 9:30AM

Notes:

Monthly Operating Status:

System(s) currently running? ☑ yes ☐ no

Has the system been off-line in the past month? ☐ yes ☐ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 1.46

Visual Inspection:

Any piping disconnected?	☐ yes	☑ no
Any cracks visible in piping?	☐ yes	☑ no
Any new cracks visible in slab floor?	☐ yes	☑ no
Magnehelic guage reading 0?	☐ yes	☑ no

If yes to any question above, please provide more information below.

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ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Change in Occupancy / Use of Space:

Please indicate general use of floor space? Manufacturing

Has this general use changed in the past month? ☐ yes ☑ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☑ no

If so, please list with date:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: Dale A Barto
Project No.:
Project Location:
Client:
Preparer's Name: Dale A Barto
Date/Time: 7/5/18 9:00 AM

Notes:

Monthly Operating Status:

System(s) currently running? ☑ yes ☐ no

Has the system been off-line in the past month? ☐ yes ☑ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 1.46

Visual Inspection:

Any piping disconnected?	☐ yes	☑ no
Any cracks visible in piping?	☐ yes	☑ no
Any new cracks visible in slab floor?	☐ yes	☑ no
Magnehelic guage reading 0?	☐ yes	☑ no

If yes to any question above, please provide more information below.

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Change in Occupancy / Use of Space:

Please indicate general use of floor space? Manufacturing

Has this general use changed in the past month? ☐ yes ☑ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☑ no

If so, please list with date:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Dale A Barto | Date/Time: 7/31/18 9:30 AM

Notes:

Monthly Operating Status:

System(s) currently running? ☑ yes ☐ no

Has the system been off-line in the past month? ☐ yes ☑ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 1.49

Visual Inspection:

Any piping disconnected?	☐ yes	☑ no
Any cracks visible in piping?	☐ yes	☑ no
Any new cracks visible in slab floor?	☐ yes	☑ no
Magnehelic guage reading 0?	☐ yes	☑ no

If yes to any question above, please provide more information below.

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Change in Occupancy / Use of Space:

Please indicate general use of floor space? Manufacturing

Has this general use changed in the past month? ☐ yes ☑ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☑ no

If so, please list with date:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Dale A Barto | Date/Time: 8/29/2018 9:15 Am

Notes:

Monthly Operating Status:

System(s) currently running? ☑ yes ☐ no

Has the system been off-line in the past month? ☐ yes ☑ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 1.49

Visual Inspection:

Any piping disconnected?	☐ yes	☑ no
Any cracks visible in piping?	☐ yes	☑ no
Any new cracks visible in slab floor?	☐ yes	☑ no
Magnehelic guage reading 0?	☐ yes	☑ no

If yes to any question above, please provide more information below.

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Change in Occupancy / Use of Space:

Please indicate general use of floor space? Manufacturing

Has this general use changed in the past month? ☐ yes ☑ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☑ no

If so, please list with date:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Dale A Barto | Date/Time: 9/28/2018 9:15

Notes:

Monthly Operating Status:

System(s) currently running? ☑ yes ☐ no

Has the system been off-line in the past month? ☐ yes ☑ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 1.54

Visual Inspection:

Any piping disconnected?	☐ yes	☑ no
Any cracks visible in piping?	☐ yes	☑ no
Any new cracks visible in slab floor?	☐ yes	☑ no
Magnehelic guage reading 0?	☐ yes	☑ no

If yes to any question above, please provide more information below.

BENCHMARK
ENVIRONMENTAL
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SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Change in Occupancy / Use of Space:

Please indicate general use of floor space? Manufacturing

Has this general use changed in the past month? ☐ yes ☑ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☑ no

If so, please list with date:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: _____ Project No.: _____

Project Location: _____ Client: _____

Preparer's Name: Dale A Barb Date/Time: 10/31/18 10:45

Notes:

Monthly Operating Status:

System(s) currently running? ☑ yes ☐ no

Has the system been off-line in the past month? ☐ yes ☑ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 1.46

Visual Inspection:

Any piping disconnected?	☐ yes	☑ no
Any cracks visible in piping?	☐ yes	☑ no
Any new cracks visible in slab floor?	☐ yes	☑ no
Magnehelic guage reading 0?	☐ yes	☑ no

If yes to any question above, please provide more information below.

BENCHMARK
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Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Change in Occupancy / Use of Space:

Please indicate general use of floor space? Manufacturing

Has this general use changed in the past month? ☐ yes ☑ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☑ no

If so, please list with date:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Dale A Barta | Date/Time: 11/30/2018 9:00 AM

Notes:

Monthly Operating Status:

System(s) currently running? ☑ yes ☐ no

Has the system been off-line in the past month? ☐ yes ☒ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 1.45

Visual Inspection:

Any piping disconnected?	☐ yes	☑ no
Any cracks visible in piping?	☐ yes	☑ no
Any new cracks visible in slab floor?	☐ yes	☑ no
Magnehelic guage reading 0?	☐ yes	☑ no

If yes to any question above, please provide more information below.

BENCHMARK
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Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Change in Occupancy / Use of Space:

Please indicate general use of floor space? Manufacturing

Has this general use changed in the past month? ☐ yes ☑ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☑ no

If so, please list with date:

BENCHMARK
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Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Dale A Barto | Date/Time: 12-28-2018 10:45

Notes:

Monthly Operating Status:

System(s) currently running? ☑ yes ☐ no

Has the system been off-line in the past month? ☐ yes ☒ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 1.44

Visual Inspection:

Any piping disconnected?	☐ yes	☑ no
Any cracks visible in piping?	☐ yes	☑ no
Any new cracks visible in slab floor?	☐ yes	☑ no
Magnehelic guage reading 0?	☐ yes	☑ no

If yes to any question above, please provide more information below.

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Change in Occupancy / Use of Space:

Please indicate general use of floor space? Manufacturing

Has this general use changed in the past month? ☐ yes ☑ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☑ no

If so, please list with date:

Corrective Action Certification
Operation, Monitoring, & Maintenance Work Plan

Corrective Action Certification
Operation, Monitoring, & Maintenance Work Plan

Property Name: Hydro-Air Components Project No.: 129356-004

Client: Hydro-Air Components

Property Address: 100 Rittling Blvd. City, State: Buffalo, NY Zip Code: 14220

Property ID: 140200132120000100912l Section: 132.12 Block: 1 Lot(s): 9.121

Preparer's Name: Glenn White Date/Time: February 2019

Issue Addressed

The environmental Inspection of the above property determined the need for corrective action. This form has been completed to document the required corrective action and it's implementation.

Description of site Issue identified during Environmental Inspection (include sketch & photographs):

This Corrective Action Certification is being completed with respect to the Corrective Measures Report, dated 14 Dec 2012. No corrective issues were identified or noted during the reporting period.

Corrective Action Taken

Date Completed:

Describe Action Taken (include sketch & photographs):

Corrective actions, as documented in the Corrective Measures Report, dated 14 December 2012, were continued in 2018. Measurements of the pH in the stormwater pond have been collected by HydroAir on a monthly basis. In December HydroAir hired a contractor to clear accumulated high pH precipitated material from the northern embayment of the stormwater retention pond. (See further details in attachment to page 1 of 3 - Operation, Monitoring, Maintenance). HydroAir continues to conduct Quarterly monitoring of the gravel cover area and surfacing groundwater has not been observed within the area. The pump at the loading dock has been operated per the 2012 Corrective Measures Report.

Certification of Implementation

The signatory hereby certifies that the corrective action as described in this form has been completed in accordance with all relevant requirements of the Soil/Fill Management Plan and other applicable documents.

Preparer / Inspector: **Date:**

Signature:

Please verify inclusion of the following Attachments:

1. Site Sketch See attached pH monitoring table and site location figure.
2. Photographs

2018 PRR - Stormwater Pond Monitoring Form
HydroAir Components, Inc.
BCP Site #C915204, Buffalo, New York

In accordance with the Corrective Measures Report (dated 14 December 2012) and the Revised Site Management Plan (dated 25 March 2014) the following pond paramaters have been monitored:

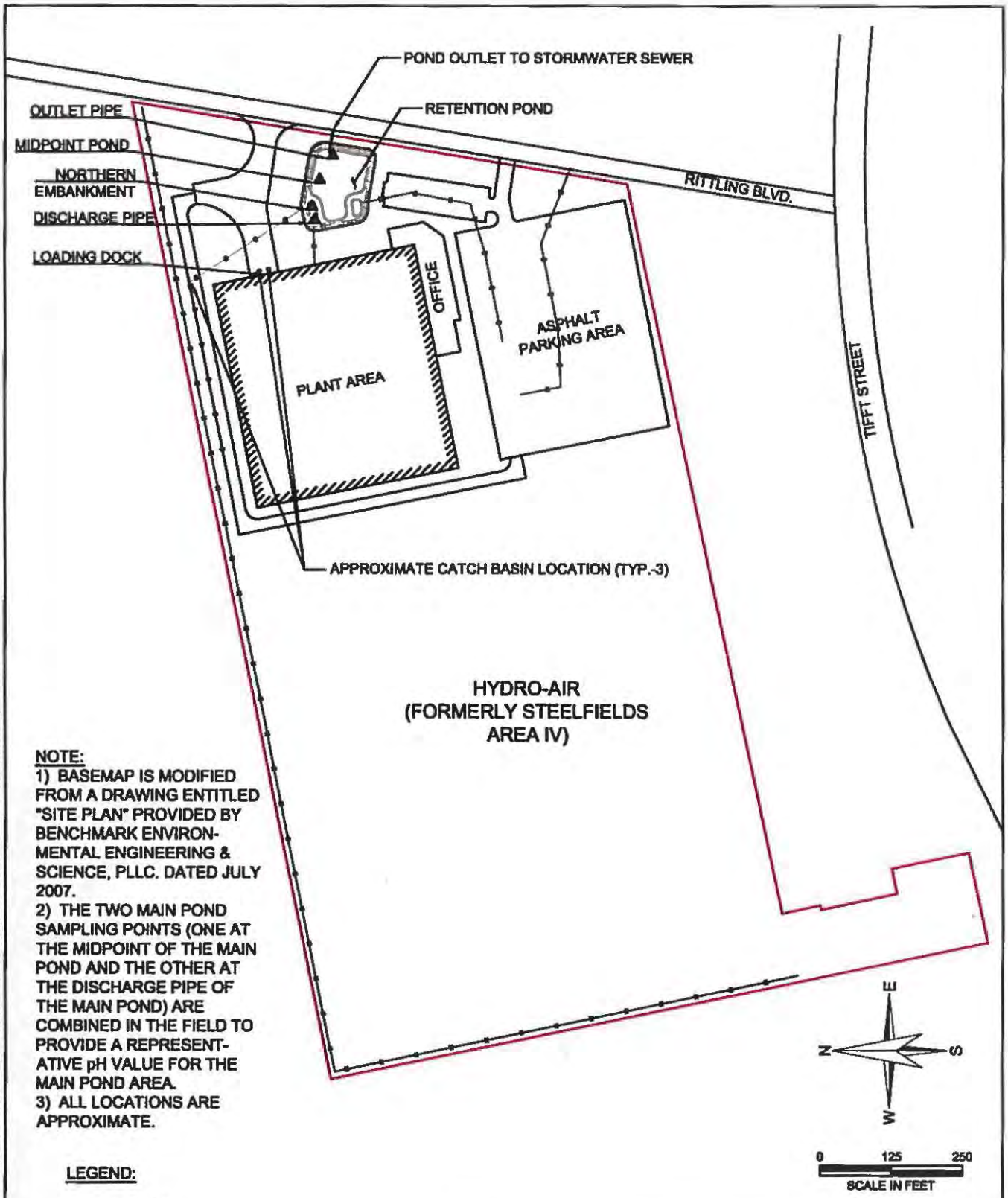
Data Collection Completed By:	Date of Measurment (DD/MM/YR)	Time of Measurement	Estimated Quantity of Water Discharged (Gallons)	Measurement Location						Conditions at Pond (color, vegetation, odor, frozen, etc.)	General Comments (weather conditions, etc)
				Discharge Pipe		Northern Embayment		Main Pond (Combined Sample)[1]			
				pH	Temp (F)	pH	Temp (F)	pH	Temp (F)		
Dale Barto	12/19/2017	9:00 AM	N/A (Starting Point)							Frozen	Cloudy, Cold
Dale Barto	1/30/2018	9:30 AM	29,612							Frozen	Cloudy, Cold
Dale Barto	2/28/2018	12:00 AM	24,634							Frozen	Sunny
Dale Barto	3/26/2018	12:00 AM	29,612							Frozen	Sunny
Dale Barto	4/30/2018	12:00 AM	24,634	9.81	50	9.46	49	9.10	46	Clear	Sunny
Dale Barto	6/29/2018	9:00 AM	25,000	9.52	67	10.00	67	6.95	68	Clear	Sunny
Dale Barto	7/31/2018	12:00 AM	29,621	9.60	70	9.45	71	6.80	70	Clear	Sunny
Dale Barto	8/29/2018	9:45 AM	24,625	9.10	79	9.00	78	7.90	78	Clear	Sunny
Dale Barto	9/28/2018	9:15 AM	29,627	9.00	72	8.70	77	8.30	77	Clear	Sunny
Dale Barto	10/30/2018	11:45 AM	24,625	9.00	68	8.50	72	8.00	72	Clear	Cloudy
Dale Barto	11/30/2018	9:00 AM	29,627							Frozen	Overcast
Dale Barto	12/28/2018	10:45 AM	24,625							Frozen	Overcast
Total Reporting Period Discharge:			325,854								

All pH values will be evaluated against the NYSDEC TOGS 1.1.1 ambient water quality guidance value of pH 8.5 selected for protection of public health.
Exceedance of the guidance value (8.5) for > 3 consecutive monitoring events (combined sample) will trigger enhancements as descirbed in Section IV of the SMP.

Notes or Other Observations:

1 Combined sample represents the combination of the sample point at the midpoint of the main pond and the sample point near the discharge pipe of the main pond. These pond samples are combined in the field to provide a representative pH value for the main pond area.
2 pH measurements were collected using a hand-held probe.

Prepared By: Dale Barto Date:
Checked By: Haley & Aldrich Date:



HALEY ALDRICH

HYDRO AIR COMPONENTS, INC.
BUFFALO, NEW YORK

RETENTION POND MONITORING LOCATIONS

SCALE: AS SHOWN
DECEMBER 2015

FIGURE 1

G:\134858_HYDROAIR\00712014 SMP AMENDMENT & REVISIONS\DRAWING\134858-007_SITE PLAN MONITORING LOCATIONS_R2.DWG

ORC Well Annual Inspection Form

ORC WELL ANNUAL INSPECTION FORM
Active ORC monitoring wells

Project Name: HYDRO AIR | Project No.:

Project Location: BUFFALO, NY | Client:

Preparer's Name: PAUL LITTLE | Date/Time: 6-26-18 1145

	A4 - ORC - 1	A4 - ORC - 2	A4 - ORC - 3
sampling dates:	6-26-18 @ 1145		
Field groundwater quality measurements			
Water Level	5.30		
Bottom Depth	14.30		
pH	5.70		
Temperature	16.9		
DO	0.70		
ORP	39		
Alkalinity	N/A		

Refer to Figure 1 for well locations

Well Integrity

Cement seal	☐ good	☒ poor	If poor please note well. GRAD COVER
Pro - casing condition	☒ good	☐ poor	If poor please note any damage.
Lock condition	☒ good	☐ poor	If poor please note well.
Working J - plug	☒ yes	☐ no	If no please note well.

ORC Sock's

Have any Socks been replaced ☐ yes ☒ no

If replaced on what date and why. NO SOCKS ON ORDER WILL REPLACE WHEN COME IN

Are socks fully submerged in well screens. ☒ yes ☐ no

If no explain why. SOCK DEPTH 13.30

Are all ORC wells begin sampled and maintained according to the site management plan
☒ yes ☐ no

If no please state why.

Initial: PSL Date:

ORC WELL ANNUAL INSPECTION FORM
Active ORC monitoring wells

Project Name: HYDRO AIR
Project No.:
Project Location: BUFFALO, NY
Client:
Preparer's Name: PAUL LUM
Date/Time: 6-26-18

	A4 - ORC - 1		A4 - ORC - 2		A4 - ORC - 3	
sampling dates:			6-26-18 @ 1235			
Field groundwater quality measurements						
Water Level			1.35			
Bottom Depth			11.55			
pH			3.91			
Temperature			16.9			
DO			0.46			
ORP			318			
Alkalinity			N/A			

Refer to Figure 1 for well locations

Well Integrity

Cement seal	☐ good	☒ poor	If poor please note well. COVERED THE GRASS
Pro - casing condition	☒ good	☐ poor	If poor please note any damage.
Lock condition	☒ good	☐ poor	If poor please note well.
Working J - plug	☒ yes	☐ no	If no please note well.

ORC Sock's

Have any Socks been replaced ☐ yes ☒ no

If replaced on what date and why. ON ORIGINAL ORDER

Are socks fully submerged in well screens. ☒ yes ☐ no

If no explain why. SOCKS @ 10.61

Are all ORC wells begin sampled and maintained according to the site management plan
☒ yes ☐ no

If no please state why.

Initial: PJL Date:

ORC WELL ANNUAL INSPECTION FORM
Active ORC monitoring wells

Project Name: HYDRO AIR | Project No.:

Project Location: BUFFALO, NY | Client:

Preparer's Name: | Date/Time: 6-26-18 1320

	A4 - ORC - 1		A4 - ORC - 2		A4 - ORC - 3	
sampling dates:					6-26-18 @ 1320	
Field groundwater quality measurements						
Water Level					3.95	
Bottom Depth					10.46	
pH					3.21	
Temperature					17.8	
DO					0.13	
ORP					239	
Alkalinity					N/A	
Refer to Figure 1 for well locations						

Well integrity

Cement seal	☐ good	☒ poor	If poor please note well. BURIED UNDER GRAVEL
Pro - casing condition	☒ good	☐ poor	If poor please note any damage.
Lock condition	☒ good	☐ poor	If poor please note well.
Working J - plug	☒ yes	☐ no	If no please note well.

ORC Sock's

Have any Socks been replaced ☐ yes ☒ no

If replaced on what date and why. ON ORDER

Are socks fully submerged in well screens. ☒ yes ☐ no

If no explain why. @ 9.45

Are all ORC wells begin sampled and maintained according to the site management plan

☒ yes ☐ no

If no please state why.

Initial: RJZ Date:

ORC WELL ANNUAL INSPECTION FORM
Active ORC monitoring wells

Project Name: Hydro Air | **Project No.:**

Project Location: Buffalo, NY | **Client:**

Preparer's Name: Timothy Bly | **Date/Time:** 1-28-19 ~~1430~~ 1205

	A4 - ORC - 1	A4 - ORC - 2	A4 - ORC - 3
sampling dates:	1-28-19 @ 1205		

Field groundwater quality measurements

Water Level	3.70		
Bottom Depth	14.30		
pH	7.32		
Temperature	3.81		
DO	3.55		
ORP	327		
Alkalinity	N/A		

Refer to Figure 1 for well locations

Well Integrity

Cement seal	☐ good	☒ poor	If poor please note well. grass covered
Pro - casing condition	☐ good	☐ poor	If poor please note any damage.
Lock condition	☒ good	☐ poor	If poor please note well.
Working J - plug	☒ yes	☐ no	If no please note well.

ORC Sock's

Have any Socks been replaced ☒ yes ☐ no

If replaced on what date and why. 1-28-19 - Plan

Are socks fully submerged in well screens. ☒ yes ☐ no

If no explain why. Sock Depth 13.55

Are all ORC wells begin sampled and maintained according to the site management plan

☒ yes ☐ no

If no please state why.

Initial: TB Date: 1-28-19

ORC WELL ANNUAL INSPECTION FORM
Active ORC monitoring wells

Project Name: Hydro Air | Project No.:

Project Location: Buffalo, NY | Client:

Preparer's Name: Timothy Bly | Date/Time:

	A4 - ORC - 1	A4 - ORC - 2	A4 - ORC - 3
sampling dates:	~~1-28-19 @ 1250~~	1-28-19 @ 1250	

Field groundwater quality measurements

Water Level	X	5.73	
Bottom Depth		11.55	
pH		7.32	
Temperature		1.68	
DO		6.06	
ORP		429	
Alkalinity		N/A	

Refer to Figure 1 for well locations

Well Integrity

Cement seal	☐ good	☒ poor	If poor please note well. Covered in grass
Pro - casing condition	☒ good	☐ poor	If poor please note any damage.
Lock condition	☒ good	☐ poor	If poor please note well.
Working J - plug	☒ yes	☐ no	If no please note well.

ORC Sock's

Have any Socks been replaced ☒ yes ☐ no

If replaced on what date and why. 1-28-19 – Plan

Are socks fully submerged in well screens. ☒ yes ☐ no

If no explain why. Socks @ 10.65

Are all ORC wells begin sampled and maintained according to the site management plan

☒ yes ☐ no

If no please state why.

Initial: TB Date: 1-28-19

ORC WELL ANNUAL INSPECTION FORM
Active ORC monitoring wells

Project Name: Hydro Air
Project No.:
Project Location: Buffalo, NY
Client:
Preparer's Name: Timothy Bly
Date/Time: 1-28-19

	A4 - ORC - 1	A4 - ORC - 2	A4 - ORC - 3
sampling dates:			1-28-19 @ 1335

Field groundwater quality measurements

Water Level			4.27
Bottom Depth			10.46
pH			7.37
Temperature			0.84
DO			3.09
ORP			361
Alkalinity			N/A

Refer to Figure 1 for well locations

Well Integrity

Cement seal	☐ good	☒ poor	If poor please note well. buried under grass
Pro - casing condition	☒ good	☐ poor	If poor please note any damage.
Lock condition	☒ good	☐ poor	If poor please note well.
Working J - plug	☒ yes	☐ no	If no please note well.

ORC Sock's

Have any Socks been replaced ☒ yes ☐ no
If replaced on what date and why. 1-28-19 – Plan

Are socks fully submerged in well screens. ☒ yes ☐ no
If no explain why. @ 9.48

Are all ORC wells begin sampled and maintained according to the site management plan
☒ yes ☐ no

If no please state why.

Initial: TB Date: 1-28-19

Addendum to ORC Forms

The seals of the ORC wells are presumed intact and only covered by soil. Haley & Aldrich has observed no other indications of disturbance in this area to indicate otherwise.

The ORC socks were most recently replaced on 28 January 2019. ORC socks had been scheduled to be replaced in June 2018, but replacement socks were not available during the field representatives (TestAmerica) visit to the site. Subsequently, the individual whom had been servicing the socks retired and the regular replacement of the socks inadvertently did not occur. TestAmerica was contacted in January 2019 and a new individual has been assigned to this maintenance activity and completed the change out on 28 January 2019. Going forward the six-month change-out schedule will be resumed.