

Flexo Transparent, Inc. 28 Wasson Street • Buffalo, New York 14140

REMEDIAL INVESTIGATION REPORT/ REMEDIAL WORK PLAN

1132 – 1146 Seneca Street Site Buffalo, New York 14240 (BCP Site C915228)

JULY 2010

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Flexo-Transparent, Inc. (Flexo) voluntarily entered into a Brownfield Cleanup Agreement with the New York State Department of Environmental Conservation (NYSDEC) under the Department's voluntary Brownfield Cleanup Program (BCP). The agreement was signed on December 8, 2008 and includes a requirement that a remedial investigation (RI) be completed of the entire BCP site. The BCP site comprises three adjacent properties located at 1122, 1132 and 1146 Seneca Street, Buffalo, New York (The Site). See Figure 1-1. All three parcels have been characterized under this RI and data from all three parcels reported herein. Under the BCP, Flexo is redeveloping the Site for expansion of their current business which involves the manufacture of plastic wraps and bags for food and other product packaging. The Site properties include a former electrical transformer manufacturing facility on the west (1122 and 1132 Seneca Street) and former brick and lumber manufacturing facilities (now vacant land) on the east (1146 Seneca Street). The three-parcel Site totals approximately 4.2 acres. Flexo plans to redevelop the Site for light industrial, warehouse, office, and related parking uses.

This Remedial Investigation/Remedial Work Plan (RI/RWP) was prepared by Malcolm Pirnie, Inc. (Malcolm Pirnie) for Flexo and includes the following:

- Site history
- Description of physical Site features and hydrogeologic conditions
- Summary of previous environmental investigations and remediation
- Interim remedial measures completed
- Remedial investigation methods and results
- Data usability
- Site contaminant characterization
- Discussion of potential human health risk
- Conclusions and recommendations
- Site Redevelopment Plan
- Remedial Goals and Objectives
- Remedial Alternatives
- Alternative Analysis





1.1. Site History

1122 and 1132 Seneca Street

According to Erie County GIS data, April 2008, 1122 and 1132 Seneca Street are lot numbers 123.29-1-12 123.29-1-11 respectively. The combined property is approximately 2.02 acres in size and is zoned for "Manufacturing and Processing". The property improvements include a former manufacturing building that once housed office, warehouse, and manufacturing areas. The building foot print is approximately 41,000 square feet and occupies the majority of the property. The construction date of the Site building is estimated to be 1920.

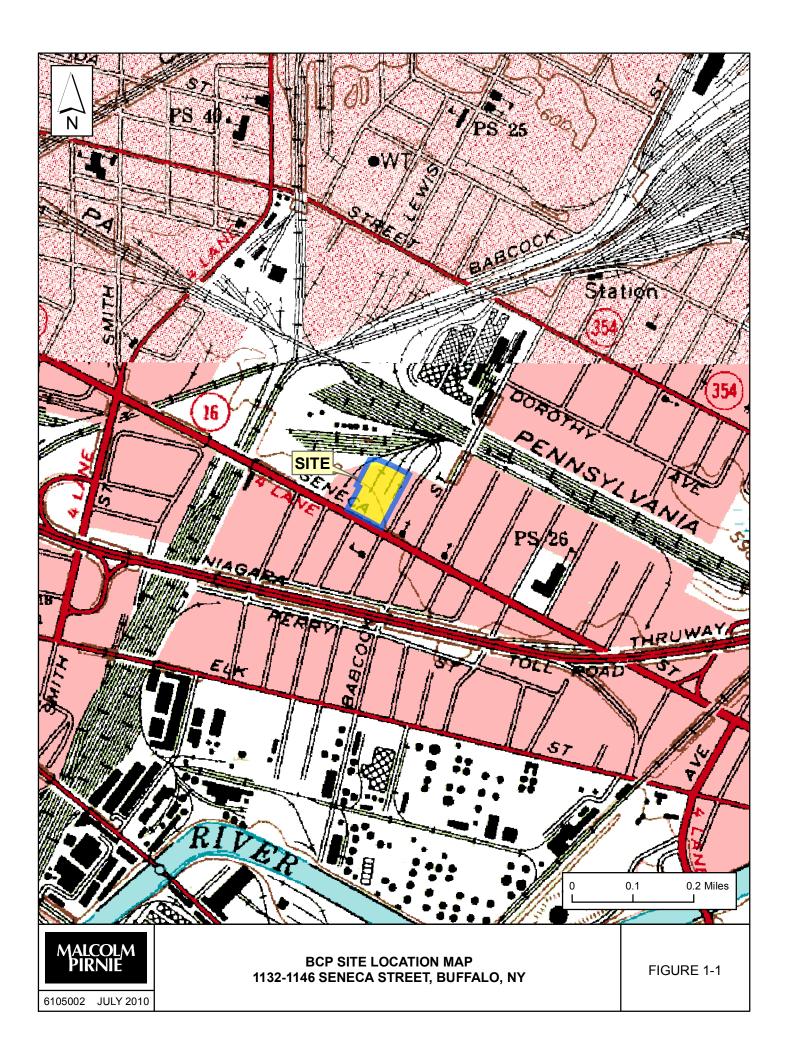
Site operations on the 1122/1132 property included lumber and railroad yards, manufacture of electrical transformers and machines (Westinghouse and Eastern Electric), and most recently, the manufacture of fiberglass railroad transfer platforms (Fibreright). The northern and western portions of the Site are enclosed within a chain link fence. A chain link fence that once separated the 1132 and 1146 properties was removed by Flexo soon after Flexo took ownership of these properties. Paved access roads that lead to an unpaved dirt/gravel area on the north side of the building are located along the western and eastern property boundaries. The northern area is vacant and covered with crushed stone and grass. This area once contained fiberglass platforms, a dumpster, and plastic and metal refuse when owned by Fibreright. A rail spur enters the manufacturing building from the north and ends at a loading platform within the eastern side of the building. The southern boundary of the Site is Seneca Street, where two large garage doors provide access to the manufacturing building.

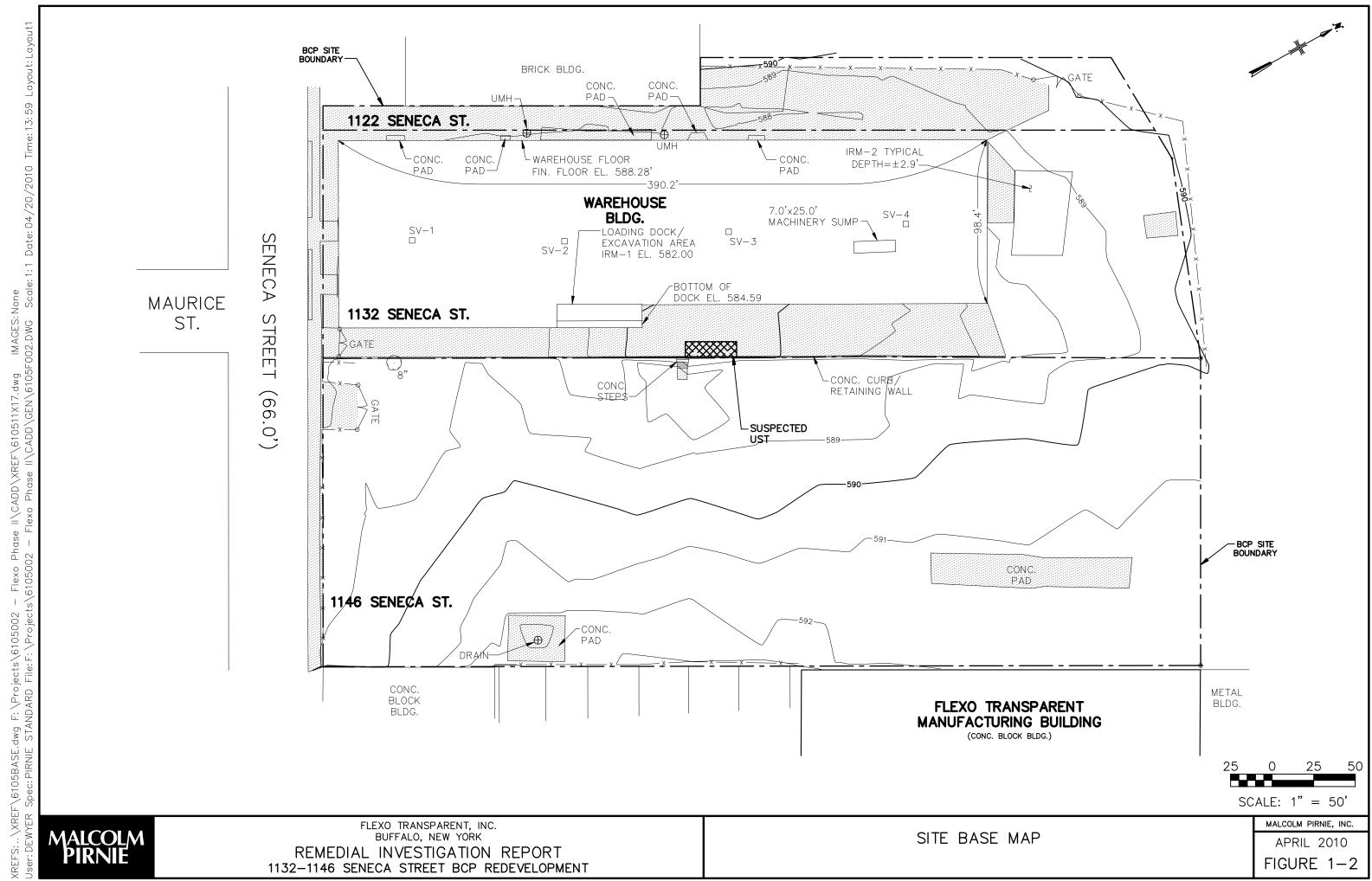
1146 Seneca Street,

The eastern property, located at 1146 Seneca Street, consists of one parcel identified by Erie County's GIS website as Parcel 83422 and lot number 123.29-1-10. The property which is approximately 2 acres in size is zoned "Vacant Industrial" and, when purchased by Flexo, contained overgrown shrubs and tall grass. Two concrete slab foundations, one measuring approximately 125 feet N/S and 20 feet E/W and the other measuring 40 N/S and 35 E/W are located on the property, see Figure 1-2. Information obtained during a Phase I Environmental Site Assessment file review indicated that a bioremediation pad was formerly located on the 1146 Seneca Street property and was used for remediation of petroleum impacted soils excavated from an adjacent property (1070 Seneca Street) to the north. The larger 125'x20' pad may be the pad referred to in the Phase I ESA. The smaller pad shows evidence that it may be the former foundation of a two bay auto repair garage. A floor sump was located in the depressed center of the foundation and concrete ramping is present on the western edge of the foundation as would be used at the vehicle entrance of a garage.











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Historic operations on the 1146 property include lumber and railroad yards, clay/brick products manufacturing, and a gasoline filling station. A portion of the property may also have been used by Westinghouse and Eastern Electric for manufacture of transformers and machines. Existing conditions at the Site include a surrounding chain link fence and a locked access gate located along the southern boundary. Abandoned playground equipment associated with the Seneca-Babcock Community Center was located but since removed from the southeastern portion of the property adjacent to the smaller (40'x35')foundation remnants, potentially of a former gas filling station or two-bay auto service garage. Flexo's manufacturing building is located adjacent to the northeastern portion of the 1146 Seneca Street property.





1-3

This Section contains a description of the physical setting based upon information provided in regional and site-specific reports, USGS Topographic Maps, visual observations, and information obtained from the remedial investigation which included drilling 88 soil borings, excavation of 19 test pits, a topographic survey, and measurement of groundwater elevation at five well locations.

2.1. Topography and Surface Waters

The Site is located in an area of generally flat terrain with a topographic gradient sloping slightly from east to west. A Site low point is located near the center of the Site where a former rail loading dock is located.

Site elevations were measured by a licensed survey subcontractor (Wendell Duchscherer) to Malcolm Pirnie during the RI. Site elevations range from approximately 584' to 592' above mean sea level. The 1122/1132 parcels are mostly flat and covered by the former manufacturing building. The 1146 parcel slopes from east to west from elevations of 592 to 589 at a slope of approximately 0.016 feet per foot.

According to the EDR report, provided in the Phase I ESA report, the Site is located outside 100-year and 500-year flood zones. EDR did identify wetland areas located approximately one-half mile to the south of the Site and others east and south of the Site within one mile. No wetlands were observed on Site and none were listed as present on Site according to the National Wetland Inventory.

No surface water bodies were identified on the Site. The Buffalo River is located approximately one-half mile south of the Site.

2.2. Geology

Overburden

The Erie County Soil Survey (USDA) identifies the Site as being Urban Land, containing undifferentiated and disturbed soil/ fill.

Over one hundred boreholes and test pits have been drilled/excavated on the 1122/1132 property and 34 on the 1146 property as part of multiple environmental site characterizations since 2001.





Based on observations of the overburden materials encountered at each of these soil boring and test pit locations, the overburden is described as glaciolacustrine silty sand and clay deposits overlain with soil/fill deposits described as follows:

Soil/Fill

The soil/fill was present at every location drilled on the Site, even where concrete pavement was present. Therefore the soil/fill layer is believed to be continuous across the Site. The soil/fill was generally described as black-gray, fine to coarse grain sand with silt and trace clay admixed with Construction and Demolition (C&D) debris comprised of wood, concrete, brick and gravel. The measured fill thickness beneath the warehouse building ranged from 0.3 feet at RI boring B/MW-3 to 1.3 feet at Pirnie Phase II boring B-10. The maximum thickness of fill encountered located on the west side of the 1132 building in a former underground storage tank (UST) area that had been removed and backfilled. The fill thickness here is 11.0 feet as measured at Evergreen Phase II borehole PH-1. Outside of the former UST backfill area, the thickness of soil/fill encountered across the Site ranged between 0 at only one boring (RI boring B-6) and 4.2 feet at RI Boring B/MW-4. In general, fill thicknesses were typically between 1.0 and 2.0 feet. Thickest fill was found at the northeastern corner of the Site and thinnest fill at the southern end of the Site. Figure 2-1 provides a map illustration of soil/fill thicknesses encountered.

Native Silt and Clay

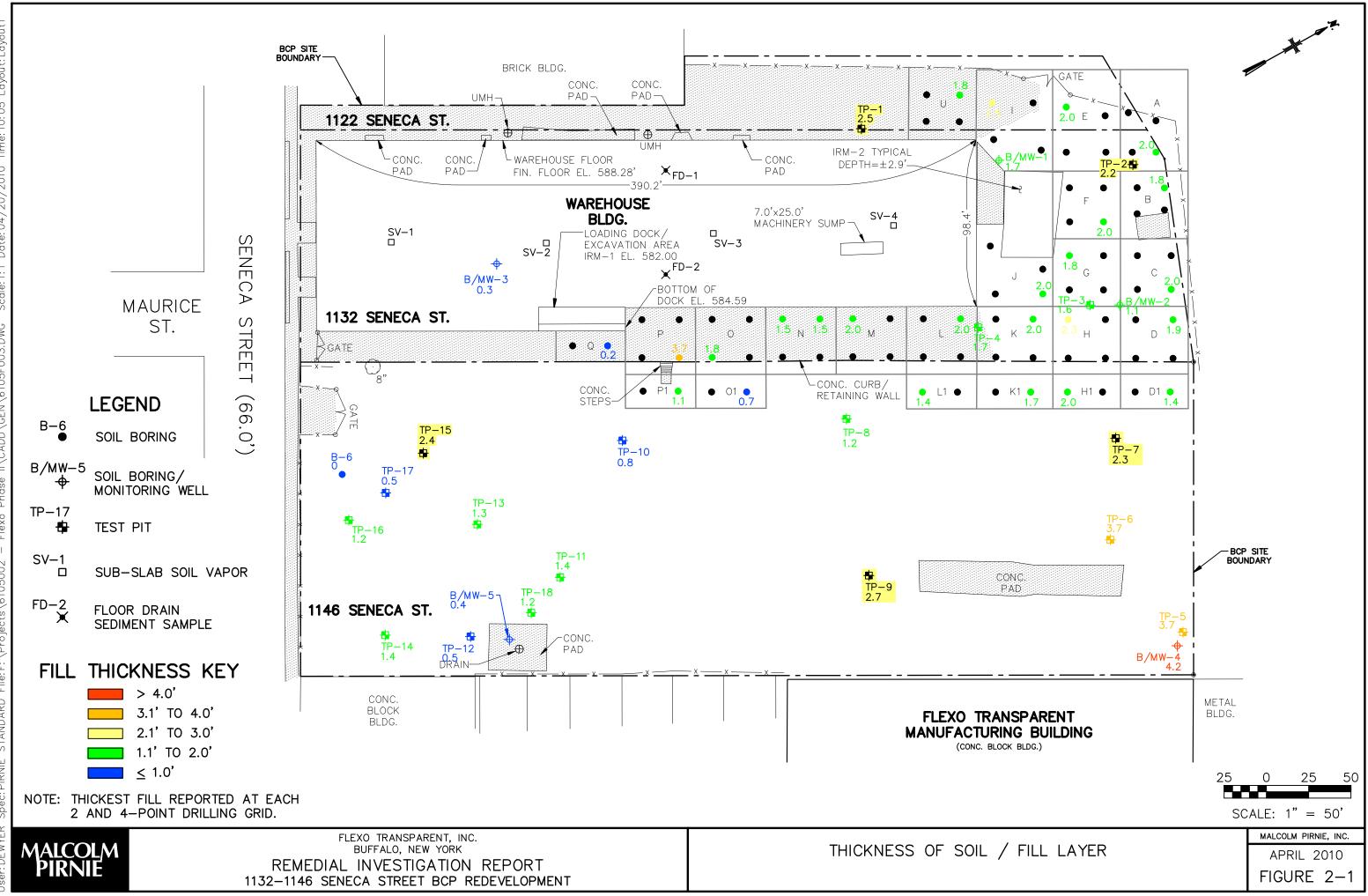
Beneath the soil/fill layer, native glacial deposits of silt/sand and clay are present throughout the Site. Thin lenticular silt/sand deposits were encountered directly below the soil/fill layer at some drilling/excavation locations. These are described as gray-brown/black sand and silt with clay and fine gravel. A stiff, dense, red to light-brown, clay unit was encountered below the thin sand/silt lenses and is generally correlative across the Site. The clay unit is characterized as having weak to moderate plasticity and containing trace amounts of silt and fine sand that are typical of local glacio-lacustrine deposits. The native clay layer is relatively thick (up to 9.9 feet) and was present at all boring locations drilled on Site. This native clay layer has been demonstrated to restrict downward migration of groundwater and contaminants in the soil/fill layer from migrating the underlying soils and bedrock. For this reason, the focus of this and previous environmental investigations of the Site have focused primarily on the upper soil/fill layer and uppermost native soils and not the deeper clay and bedrock.

Bedrock

Two of the soil borings drilled as part of the RI (B-5 and B-6) were drilled deeper than other borings to test the overburden stratigraphy and depth to bedrock. Both borings







were located on the 1146 Seneca Street property and encountered bedrock at 9.8 feet and 9.9 feet respectively.

The bedrock beneath the Site is reportedly the Moorehouse Member of the Middle Devonian age Onondaga Limestone (Tesmer 1963). The Moorehouse is described as course to very finely crystalline limestone, dark gray to tan in color, with chert present.

The bedrock in this area is reportedly nearly horizontally bedded with a very slight southward dip. Differential erosion caused by glaciers often results in a bedrock surface that is dissimilar to the bedrock bedding direction and angle.

Figure 2-2 provides geologic cross sections of the Site. Locations of the cross-section lines are illustrated on the sample location map, Figure 5-1.

2.3. Hydrogeology

Based on observations made and data collected during the RI and Phase II investigations of the Site, overburden groundwater, when present, is perched on the native silt/clay layer. Overburden groundwater is discontinuous across the Site and only ephemerally present, dependent upon the degree of seasonal and periodic precipitation and snow melt.

Of the five temporary monitoring wells installed on Site, one, B/MW-3, located inside the building, was dry on all four occasions tested. Another well, B/MW-4, located at the northeast corner of the Site, was dry at the time of installation but subsequently contained measureable water. Overburden groundwater has been found to be consistently present in areas where the soil/fill layer is relatively thin and low in elevation, such as the area north of the 1132 building. The two wells located in this area, wells B/MW-1 and B/MW-2, consistently contain water.

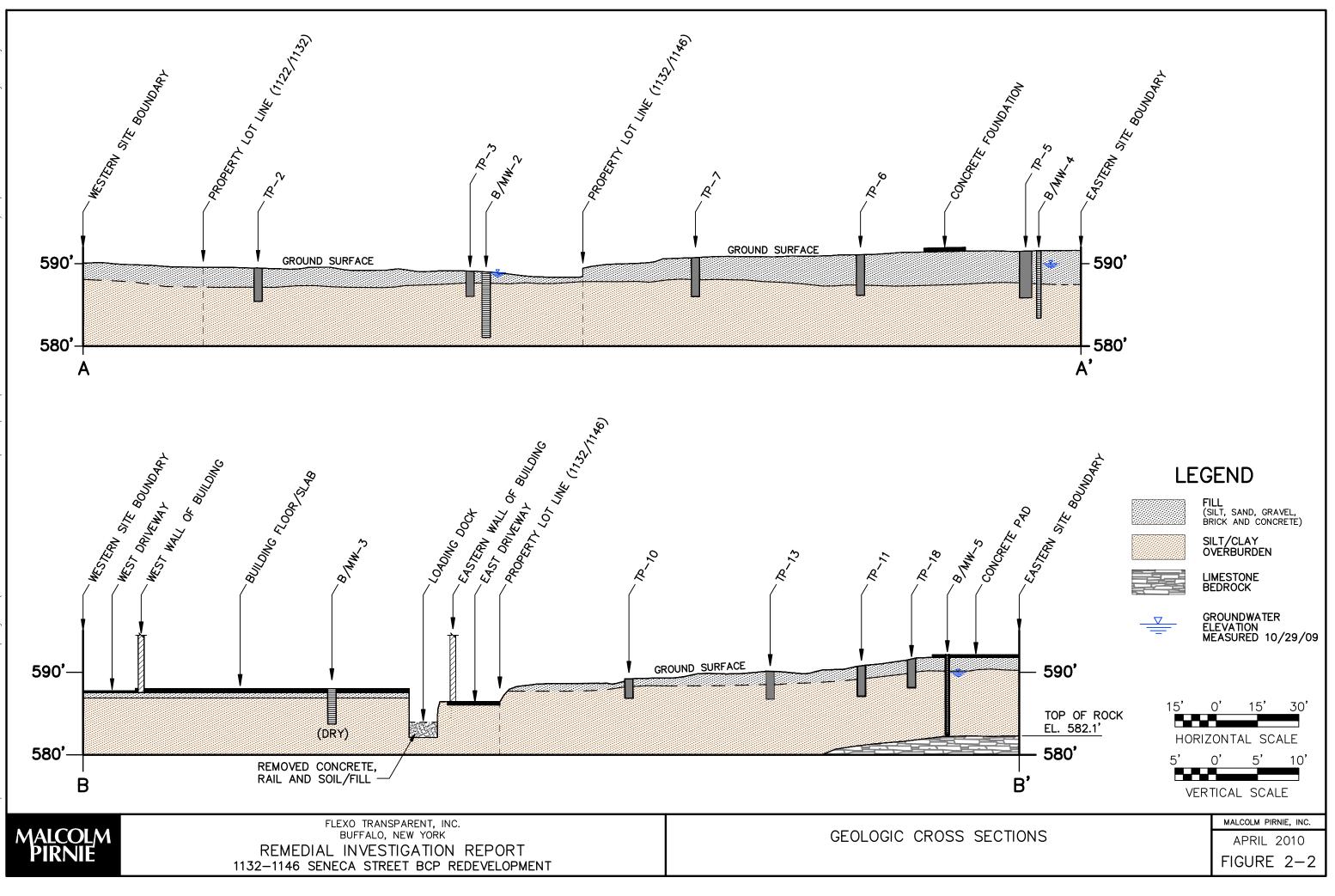
Water levels were measured in the five wells on four occasions during the RI between the dates of October 29, 2009 and April 14, 2010. These water level data are provided in Table 2-1. Water elevations were mapped for each measurement event and found to be very similar between events. Groundwater elevation data collected on October 29, 2009 were chosen to prepare an isopotential map of the overburden groundwater, See Figure 2-3. As illustrated on Figure 2-3, overburden groundwater flow generally reflects the Site topography, flowing from east to west across the 1146 property and having a southwesterly component at the northern, low elevation, area of the 1132 property.

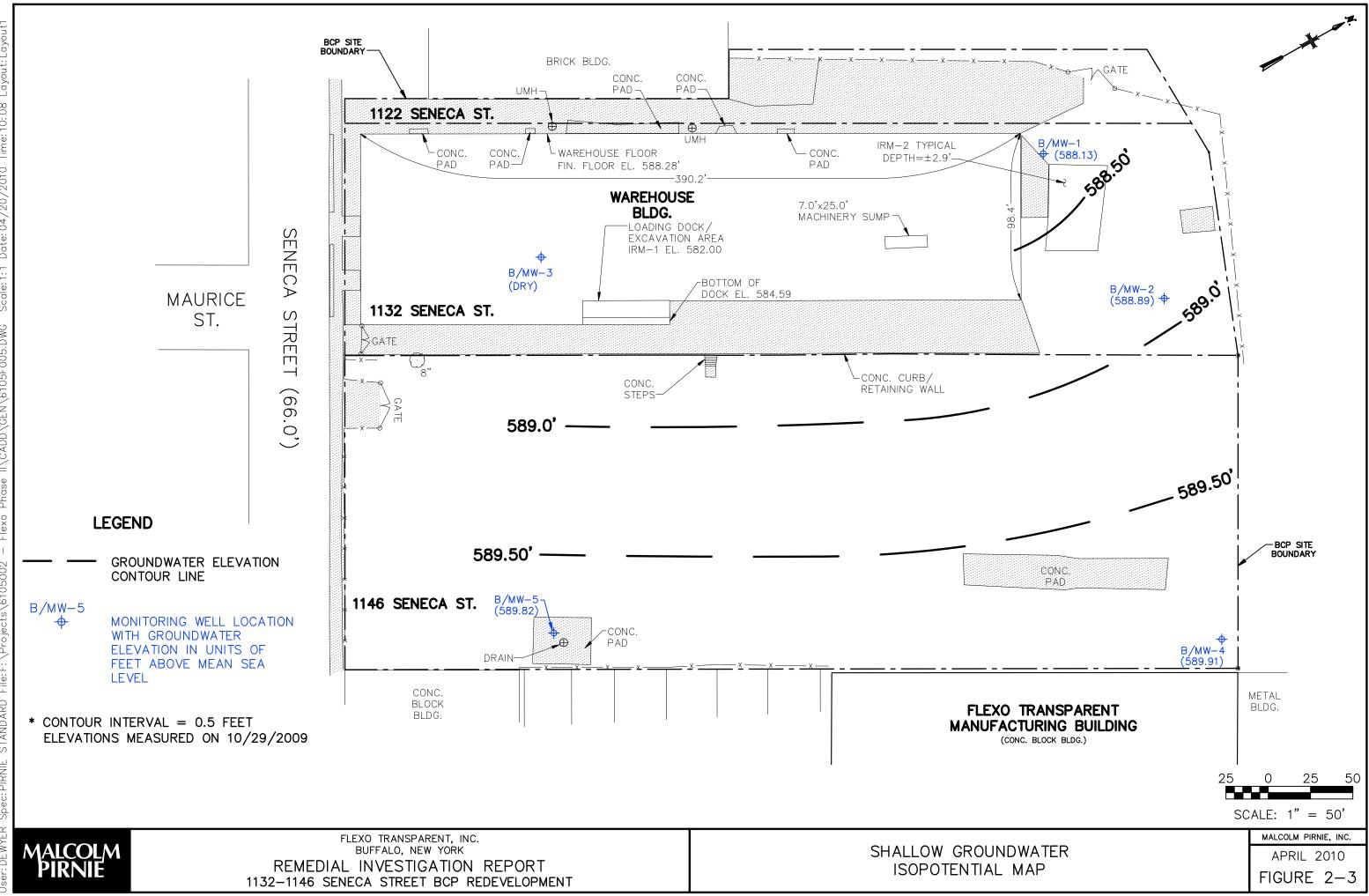
Based on local topography and the location of the nearest major surface water body, the Buffalo River, deep bedrock groundwater at the Site is expected to flow towards the south/southwest.

Five Federal USGS wells and two State wells were identified in the database information obtained from EDR within a one-mile radius of the Site. The EDR report, included in the









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TABLE 2-1 GROUNDWATER ELEVATION MEASUREMENTS REMEDIAL INVESTIGATION REPORT 1123-1146 SENECA STREET SITE BUFFALO, NEW YORK

| | PVC Riser | Water Level | Groundwater |
|-----------------------|-----------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| | Elev. | 10/21/2009 | Elev. | 10/29/2009 | Elev. | 11/3/2009 | Elev. | 4/14/2010 | Elev. |
| Well No. | (ft AMSL) | (ft BTOR) | (ft AMSL) | (ft BTOR) | (ft AMSL) | (ft BTOR) | (ft AMSL) | (ft BTOR) | (ft AMSL) |
| B/MW-1 | 591.15 | 3.28 | 587.87 | 3.02 | 588.13 | 3.34 | 587.81 | 3.2 | 587.95 |
| B/MW-2 | 591.61 | 2.80 | 588.81 | 2.62 | 588.99 | 2.66 | 588.95 | 2.80 | 588.81 |
| B/MW-3 ⁽¹⁾ | 588.28 | DRY | NA | DRY | NA | DRY | NA | DRY | NA |
| B/MW-4 | 594.73 | DRY | NA | 4.82 | 589.91 | 5.10 | 589.63 | 5.34 | 589.39 |
| B/MW-5 | 593.88 | 6.12 | 587.76 | 4.06 | 589.82 | 4.24 | 589.64 | 5.30 | 588.58 |

Notes: AMSL - Above Mean Sea Level BTOR - Below Top of Riser (1) B/MW-3 Has been dry since intallation.

Phase II Report, provides the location of these wells but does not provide any information related to groundwater quality or depth to groundwater information. No public water supply wells were identified in the EDR report.





3.1. Previous Investigations and Remediation

The following is a summary of previous environmental investigations and remediation performed at the 1122, 1132 & 1146 Seneca Street properties. Information for this summary was obtained from reports prepared by Malcolm Pirnie and others. Figure 3-1 shows the approximate locations soil borings drilled and sampled during the following investigations that were completed leading up to the remedial investigation.

3.1.1. 1989-1990 Removal of PCB Sludge Piles

On behalf of Westinghouse Electric Corporation (then owner of the 1132 Seneca Street property) Dames & Moore performed an environmental investigation and remedial action on the 1132 Seneca Street property between October 1989 and November 1990. The investigation and remediation were completed with NYSDEC oversight. The October 1991 Dames& Moore report documents the remediation of two PCB-containing sludge piles partially located in the northeastern corner of the 1132 Seneca Street property. Most of the larger of the two piles was located off and north of the 1132 Seneca Street property.

The Dames & Moore report details three phases of soil sampling and removal at the two sludge pile locations. The work resulted in the removal and off-Site disposal of both sludge piles and soils underlying the piles to a maximum depth of 44 inches. A total of 120 cubic yards of PCB-impacted soil was removed and the excavations backfilled with clean soil. The third and final phase of soil excavation and disposal was completed during October 1990. Appendix A provides documentation of the above described remedial action.

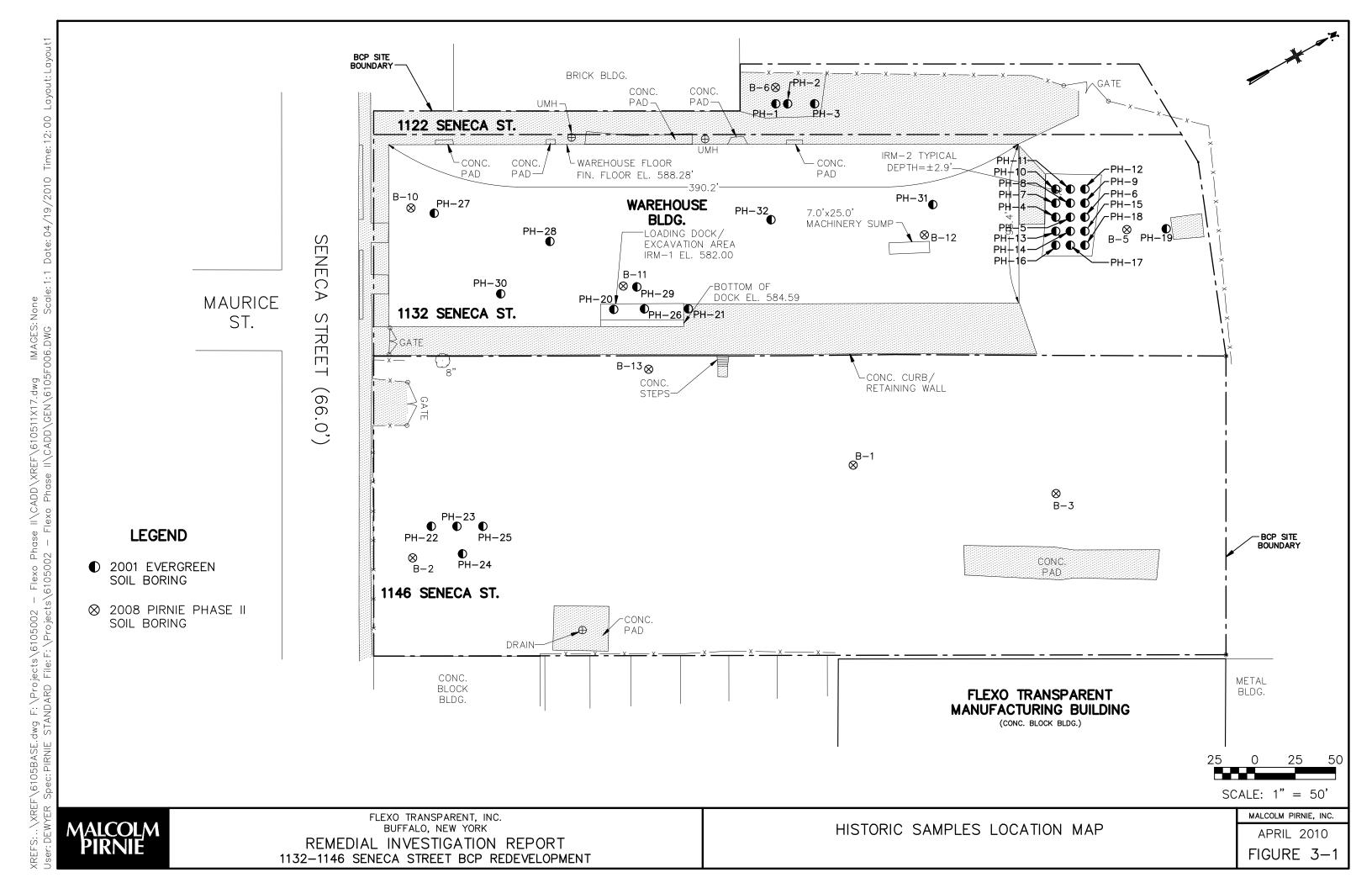
3.1.2. July 2001 Evergreen Focused Environmental Investigation

On behalf of Fibreright Manufacturing, Inc., (then owner of the 1122, 1132 and 1146 Seneca Street properties) Evergreen Testing and Environmental Services, Inc. performed a limited environmental sampling and subsurface investigation of the 1122/1132 and 1146 Seneca Street properties.

The Evergreen sampling primarily focused on four main areas of potential concern. Two of the four areas were known or suspected former underground storage tank (UST) areas. One of these a known former UST location immediately west of the manufacturing building and the other a suspected former UST area located on the 1146 property, immediately adjacent to Seneca Street, potentially a former gas filling station. The other







two main areas of potential concern were areas of potent PCBs in soil/fill, one an interior loading dock at the eastern side of the 1132 building, the other the rear, northern, yard of the 1132 building.

Results

<u>Western Former UST Area</u> - VOCs and SVOCs were present in soil/fill samples collected from three borings at this location but at concentrations below STARS guidance criteria and TAGM cleanup objectives. A groundwater sample from this area did not contain parameters of concern at concentrations above NYSDEC Class "GA" groundwater quality standards. Backfill and groundwater conditions encountered indicate that the UST(s) have been removed at this location and the excavation backfilled with clean soil.

<u>Suspected Former Gas Station UST Area</u> – at two of four borings drilled in the area of suspected gas station USTs on the 1146 property, petroleum odors were noted in the soil/fill. Analytical results of soil/fill samples collected there identified low concentrations of select VOCs at concentrations above NYSDEC STARS guidance criteria but below current Soil Cleanup Objectives.

North PCB Area - Fifteen soil borings were drilled and sampled in a grid pattern in an area approximately 50' wide (west to east) x 30' deep (north to south) near and to the north of the former manufacturing building on the 1132 property. Borings were advanced to 6 and 8 feet below grade. Soil/fill material was encountered in all borings and measured between 2.5 and 4.5 feet in thickness. Samples were collected from the upper four feet and from the interval from four feet to total depth (six or eight feet). Twenty seven samples were collected from the 15 borings and analyzed for PCBs. PCBs were detected in 12 of the 27 samples with the highest total PCB concentration being 17 PPM in boring PH-18. PCBs above 1 PPM were present in four other samples from this area.

Loading Dock PCB Area - Three soil borings were drilled at the interior loading dock of 1132 building to a maximum depth of seven feet. Three samples were collected from two of these borings and analyzed for PCBs. One of the samples from boring PH-20 (0-4' depth) contained total PCBs at a concentration of 3500 PPM in the soil/fill, above the EPAs 50 PPM hazardous waste classification. The other two samples contained 4.1 PPM and 0.66 PPM of total PCBs.

Groundwater was encountered in only four of 32 borings advanced on the 1132 and 1146 Seneca Street properties. The saturated conditions were identified in borings PH-2, PH-3 (the backfilled UST site) and at borings PH-4 and PH-5 at the north PCB area.





A native soil unit consisting of clay or silty clay with interbedded sand was identified below the fill unit in all borings drilled by Evergreen.

Figure 3-1 illustrates the locations of all 32 soil borings that were drilled and sampled within the Site as part of the Evergreen investigation. A copy of the 2001 Evergreen Investigation report was included in the Phase I ESA.

3.1.3. November 2006 Soil/Fill Removal

On November 28, 2006, Flexo voluntarily removed 390.64 tons of ink-contaminated soil/fill from the western boundary of their property at 28 Wasson Street extending onto the 1070 and 1146 Seneca street properties.

The contamination was first reported by LCS in a Phase I Environmental Site Assessment (ESA) prepared for First Niagara Bank (LCS, 4/2006). The Phase I reported historic dumping/discharge of waste ink/solvent mixtures by previous owners of the property. First Niagara Bank hired Hazard Evaluations, Inc., of Orchard Park, NY to perform a Phase II Environmental ESA of the area of concern, (Hazard Evaluations, July 2006). Hazard Evaluations excavated five test trenches from which soil screening and sampling was performed. Based on field observations and screening results, four soil/fill samples were collected and submitted for analysis of VOCs, SVOCs, RCRA metals, and PCBs.

Results

Samples were found to contain a few SVOCs (PAHs) at concentrations above the 1994 TAGM Recommended Soil Cleanup Objectives (RSCOs). The results of the Phase II were reported to the NYSDEC. Based on the field observations and analytical results the samples, the Department assigned the site a spill number (0650733) and an "inactive" status in the Spill Report Database.

Flexo hired Hazard Evaluations to remove and dispose of the impacted soil/fill, (Hazard Evaluations, December 2006). The extent of the excavation was determined visually by the presence or absence of colored inks. The excavation work resulted in the removal of mostly soil/fill material and some native silty clay soil to a total depth ranging between 3 and 5 feet below grade. The foot print of the resultant excavation was isosceles triangular in shape with one side approximately 2.5 feet from and parallel to the western wall of the Flexo Transparent manufacturing building. Five conformation samples were collected from the sidewalls and bottom of the excavation and analyzed for VOCs, SVOCs, and the RCRA list of metals. Concentrations of VOCs, SVOCs, and metals, were below the current SCOs for industrial properties in all five samples. The 390.64 tons of impacted soil/fill was brought to the Tonawanda Landfill and the excavation was backfilled with soil/fill from other areas of the site generated from other site work. Based on the nature and amount of impacted soil/fill removed and the results of confirmatory samples, Hazard Evaluations stated in their report that the remediation of the printing-related





wastes along Flexo's western boundary have been adequately completed. Appendix A provides documentation of the above described remedial action.

3.1.4. Sept 2007 Phase I Environmental Site Assessments (ESA)

A Phase I Environmental Site Assessment (ESA) was completed by Malcolm Pirnie, Inc. in September 2007 for the three Site properties. The Phase I ESA identified Recognized Environmental Conditions (RECs) and de minimis conditions at the Site. The RECs and de minimis conditions found during the ESA are listed below by the property tract in which they were identified:

1122/1132 SENECA STREET

- Significant staining and cracking of the concrete floor within the manufacturing building was evident.
- "Oily-greasy" stained soil was observed in the grassed area located north of the manufacturing building. The stained soil was found proximate to an area of PCB impacted soil/sludge piles for which there is documentation of remedial action.
- A limited subsurface investigation completed in 2001 (see Section 1.2.2) identified elevated PCB concentrations in soil samples collected in the northern grassed staging area discussed above and in the interior railroad loading dock area.
- Based on the age and condition of the manufacturing building, asbestos containing materials (ACM) and lead-based paint may be present as a de minimis condition.

At the time that the Phase I was performed, the property owner at that time (Fibreright) was in the process of vacating the building and much debris, products, and equipment was present and being prepared for removal. At the time that Malcolm Pirnie subsequently performed a Phase II ESA (see Section 3.1.5) and later the RI, the interior of the building was emptied of these materials and the floor cleaned. No significant floor staining was observed during the Phase II or RI and therefore no samples were collected based on floor staining.

1146 SENECA STREET

- Based on sparse reporting records an "oily-greasy" soil was observed in the northeast portion of the 1146 property.
- Soil samples collected in an area reported to possible be a former gasoline filling station in the southeast quadrant of the 1146 property identified slightly elevated VOC concentrations in excess of STARS criteria.

3.1.5. March 2008 Phase II Investigation

Malcolm Pirnie performed a Phase II investigation of the properties located at 1122/1132 and 1146 Seneca Street in support of the BCP application. Surface and subsurface





soil/fill samples were collected from direct-push soil borings drilled to maximum depths of 12 feet. Samples were analyzed for TCL VOCs, SVOCs, TAL metals and PCBs.

The Phase II provided additional data for better characterization of the physical and chemical nature of the Site surface and subsurface soil/fill material. As shown on Figure 3-1, a total of nine borings were advanced and discrete soil samples were collected based on PID screening results coupled with visual and olfactory observations. Groundwater samples were not collected during the 2008 investigation since all borings advanced during this investigation were dry.

3.1.5.1. Phase II Results - 1132 Seneca Street

Elevated concentrations of PCBs were detected at the boreholes B-5 (20.6 PPM) near the northern property boundary and at boring B-11 at the railroad loading dock (16.9 PPM). Arsenic was detected at a concentration above the restricted industrial SCO at B-10, located within the Site building near the southwest corner.

3.1.5.2. Phase II Results - 1146 Seneca Street

Several SVOCs were detected at concentrations below the soil cleanup objectives for commercial use property in three of the four samples collected at the 1146 property.

PCB (Aroclor 1260) was detected in one sample (B-3) at a concentration of 0.6 mg/kg.

Arsenic and barium were detected in one or more samples above the restricted industrial and/or commercial SCOs.





4.1. Background

As discussed in Section 3 above, analytical results of previous Site investigations identified elevated PCB concentrations in soil/fill material at two Areas of Concern (AOCs) located on the 1132 Seneca Street property. PCB-impacted soil/fill material appeared to be limited to a depth range from the surface, directly below the concrete pavement of the loading dock, to a depth of approximately two feet below the base of the concrete. At the second area of concern located in the exterior back yard to the north (rear) of the building, the depth of PCB impact was potentially up to six feet based on vertical composite sampling.

Based on the known concentrations of PCBs which exceeded Commercial Soil Cleanup Objectives (SCOs), the impacted soil/fill was removed at these two locations as interim remedial measures (IRMs) completed concurrent with performance of the RI. The locations of the two IRMs are illustrated on Figure 1-2.

Upon Department approval of the RIR/RWP, both IRM excavations will be backfilled with clean soil concurrent with other remedial actions and redevelopment activities planned for he Site.

4.2. Objectives

The objectives of the IRMs were to:

- Reduce the potential for exposure to PCB contaminated soil/fill at or near the surface.
- Reduce the potential for Site contamination to impact groundwater beneath the Site and off-Site locations.

4.3. Methods

4.3.1. Loading Dock IRM Methods

The PCB impacted soil/fill at the interior loading dock was located on and beneath the concrete floor of the loading dock which contained one pair of steel rail lines. The IRM at this location involved the removal and off-Site disposal of steel rails and concrete flooring followed by excavation of the underlying impacted soil/fill. The excavation continued until the soil/fill beneath the rails and concrete slab was removed within the loading dock. The resulting excavation bottom was in the native clay soil.





Once excavation had been completed, post-excavation confirmation samples were collected from all four sides of the rectangular excavation and from the excavation floor.

The concrete, steel, and soil/fill were characterized by the remedial contractor (OpTech) prior to off-Site disposal. Table 4-1 provides a listing of all field samples collected during the RI and IRMs with analyses performed. Appendix B contains photos of the IRM work and sampling.

4.3.2. North Area IRM Methods

Based on analytical data from 15 soil borings performed by Green Environmental, an approximately 30' by 50' area marked for excavation of the entire soil/fill layer. Soil/fill material was removed over the pre-determined 30"x50' area to an average depth of approximately three feet, which was approximately six inches into the underlying native silty clay material.

With Department oversight, composite post-excavation confirmation samples were collected from each of the four excavation walls and excavation bottom. Side-wall samples from the longer north and south walls were composited from five points and samples of the shorter west and east walls were composited from three points. Sidewall samples were collected from the approximate vertical mid-points at each wall. The excavation floor sample was composited from four quadrants.

4.4. Results

4.4.1. Loading Dock IRM Results

The steel rail, concrete pavement and impacted soil/fill were removed within the loading dock. Confirmatory samples collected from the excavation bottom and north, west, and south excavation walls contained PCBs at concentrations below the SCO for industrial sites. One of the two samples collected from the east excavation wall however contained PCBs above the industrial SCO of 25 PPM. Subsequently, additional samples were collected at the two east wall sample locations at lateral depths of one foot and two feet to determine the lateral extent of the PCB-impacted soil/fill at this east wall. Results of these samples indicates that the PCB-impacted soil/fill extents from the east excavation face all the way (3-feet) to the sub-grade footer of the east building wall. Table 4-2 provides a summary of analytical results of the post-excavation confirmatory samples. Appendix C provides documentation of pre-disposal sample results obtained by OpTech and manifests for the materials disposed off Site.

The steel rail was pressure washed and sent to Niagara Metals for recycling.

At total of 73 tons of soil/fill and concrete were removed from the loading dock IRM area and disposed at Model City as hazardous waste. The remaining (51' x 3' x 3') of PCB-impacted soil/fill and overlying concrete slab will be removed during Site remediation.





Table 4-1 Summary of Samples Collected Remedial Investigation/Interim Remedial Measures 1132-1146 Seneca Street BCP Site Buffalo, New York

| RI Surface Soil Samples | Depth | VOC | SVOC | PCBs | TAL Metals | Cyanide |
|---|--------------------|-----|------|------|------------|----------|
| TP-2 | 0 - 2" | Х | Х | Х | Х | X |
| TP-3 | 0 - 2" | Х | Х | Х | х | Х |
| TP-5 | 0 - 2" | Х | Х | Х | х | Х |
| TP-7 | 0 - 2" | Х | Х | Х | х | Х |
| TP-9 | 0 - 2" | Х | Х | Х | х | Х |
| TP-10 | 0 - 2" | X | X | X | X | X |
| TP-13 | 0 - 2" | X | X | X | X | X |
| TP-14 | 0 - 2" | X | X | X | X | X |
| B-2 | 0 - 2" | ~ | X | X | X | X |
| RI SubSurface Soils | Depth | | ~ | ~ | ~ | A |
| TP-1 | 1.4'-2.0' | х | х | Х | Х | Х |
| TP-2 | 1.5'-2.0' | X | X | X | X | X |
| TP-3 | 1.0'-1.5' | X | X | X | X | X |
| TP-4 | 1.0'-1.5' | X | X | X | X | X |
| TP-5 | 3.5'-4.5' | X | X | X | X | X |
| | | | 1 | | | |
| TP-Dup#1 (of TP-5) | 3.5'-4.5' | X | X | X | X | X |
| TP-8 | 0.5'-1.2' | X | X | X | Х | X |
| TP-18 | 0.5'-1.0' | Х | X | Х | Х | X |
| B-2 | 0.5'-1.0' | Х | X | Х | Х | Х |
| В-3 | 0.6'-0.9' | L | Х | Х | L | ļ |
| B-5 | 0.5'-2.0' | Х | Х | Х | Х | Х |
| RI Groundwater | | | | | | |
| RIB-1 | | Х | Х | Х | Х | Х |
| RIB-2 | | Х | Х | Х | Х | Х |
| RIB-4 | | Х | Х | Х | Х | Х |
| RIB-5 | | Х | Х | Х | Х | Х |
| B-Dup#1 (of B-1) | | Х | Х | Х | х | Х |
| RI Sub-Slab Soil Vapor | | | | | | |
| SV-1 | | Х | | | | |
| SV-2 | | X | | | | |
| SV-3 | | X | | | | |
| SV-4 | | x | | | | |
| SV-4 SV-Dup(of SV-4) | | X | | | | |
| Floor Trench Sediment | | ~ | | | | |
| FD-1 | 1.0' | | | х | | |
| FD-2 | 1.0' | | | X | | |
| Precharacterization Soil/Fill Samples | 1.0 | | | ^ | | |
| | | | | | | |
| 24 Upper (U) soil/fill samples (0-0.5' depth) | | | | | | |
| A,B,C,D,D1,E,F,G,H,H1,I,J,K,K1,L,L1,M,N,O,O1,P | | | | х | | |
| ,P1,Q,U | | | | | | |
| 23 Lower (L) soil/fill Samples (0.5' to base of fil | | | | | | |
| A,B,C,D,D1,E,F,G,H,H1,I,J,K,K1,L,L1,M,N,O,O1,P | | | | х | | |
| ,P1,,U | | | | | | |
| North IRM Confirmatory Samples | ! | | | | | |
| IRM2-North | 2.5' | | ļ | Х | | |
| IRM2-East | 2.5' | | | Х | ļ | |
| IRM2-South | 2.5' | | | Х | L | |
| IRM2-West | 2.5' | | | Х | | |
| IRM2-BTM | 3.0' | | | Х | | |
| IRM2-Dup#1 (of North) | 2.5' | | | Х | | |
| Loading Dock IRM Confirmatory Samples | | | | | | |
| RILD-North | 2.5' | | | Х | | |
| RILD-East -N | 2.5' | | | Х | | |
| RILD-East -N1 | 2.5'/1' latterally | | | Х | | |
| RILD-East -N2 | 2.5'/2' latterally | | İ | Х | | İ |
| RILD-East -S | 2.5' | 1 | 1 | X | 1 | t |
| RILD-East -S1 | 2.5'/1' latterally | | 1 | X | | l |
| RILD-East -S2 | 2.5'/2' latterally | 1 | 1 | X | <u> </u> | |
| LD-S (wood wall) | 0.5' | | 1 | X | | |
| | 0.5' | + | + | | | <u> </u> |
| LD-W (Concrete wall) | | | | X | | |
| RILD-BTM(No) | 3.0' | | | X | | |
| RILD-BTM(So) | 3.0' | | | Х | | |

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TABLE 4-2 Summary of Analytical Results Loading Dock IRM Confirmatory Samples 1132-1146 Seneca Street Site Buffalo, NY

| Sample ID Sample Depth (inches BGS) Sample Date | Restricted Use Soil Cleanup Objectives - Commercial | Restricted Use Soil Cleanup Objectives - Industrial | LD-NORTH 10/28/2009 | LD-EAST-N 10/28/2009 | LD-EAST-N1 50/24/2010 | LD-EAST-N2 5/24/2010 | LD-EAST-S 10/28/2009 | LD-EAST-S1 5/24/2010 | LD-EAST-S2 5/24/2010 | LD-SOUTH 12/16/2009 | LD-WEST 12/16/2009 | LD-BTM(NO) 10/28/2009 | LD-BTM(SO) 10/28/2009 |
|--|--|--|------------------------|-------------------------|--------------------------|-------------------------|-------------------------|-------------------------|-------------------------|------------------------|-----------------------|--------------------------|--------------------------|
| PCB (µg/kg) | | | | | | | | | | | | | |
| Aroclor 1242 | | | | | | | | | | | | 10 J | |
| Aroclor 1248 | | | | | | | | 37,000 | | 0 | 3,500 | | |
| Aroclor 1254 | | | | | | | | | | 8,400 | 4,900 | | |
| Aroclor 1260 | | | 540 D08 | 360,000 D08 | 460,000 | 380,000 | 5,800 D08 | 110,000 | 19,000 | 9,000 | 6,600 | 8 J | |
| Total PCBs | 1,000 | 25,000 | 540 | 360,000 | 460,000 | 380,000 | 5,800 | 147,000 | 19,000 | 17,400 | 15,000 | 18 | |

Notes:

Only those analytes detected at a minimum of one location are shown. Blank cells indicate non-detect.

D08 - Dilution required due to high concentration of target analyte

J - Estimated value, analyte less than reporting limit but greater than method detection limit

-Bold value indicates exceedance of Industrial SCO.

-Shaded value indicates exceedance of Commercial SCO.

Appendix C contains manifests for all materials transported and disposed off-Site from the two IRMs.

4.4.2. North Area IRM Results

Based on the analytical results of the post-excavation sidewall and bottom confirmation samples, the excavation was determined sufficient to achieve the IRM objective and did not require widening or deepening. Table 4-3 provides a summary of PCB analytical results of the IRM confirmation samples.

A total of 277 tons of PCB-impacted soil/fill from the north IRM excavation were removed from the Site and transported to the Tonawanda Landfill as non-hazardous waste via Ensol. Appendix C contains manifests for all materials transported and disposed off-Site from the two IRMs.







TABLE 4-3 Summary of Analytical Results North Area IRM Confirmatory Samples 1132-1146 Seneca Street Site Buffalo, NY

| Sample ID Sample Depth (inches BGS) Sample Date | Restricted Use Soil Cleanup Objectives - Commercial | Restricted Use Soil Cleanup Objectives - Industrial | IRM2-NORTH 10/29/2009 | IRM2-DUP#1 (NORTH) 10/29/2009 | IRM2-EAST 10/29/2009 | IRM2-SOUTH 10/29/2009 | IRM2-WEST 10/29/2009 | IRM2-BTM 10/29/2009 | | |
|--|--|--|--------------------------|-------------------------------------|-------------------------|--------------------------|-------------------------|------------------------|--|--|
| PCB (µg/kg) | | | | | | | | | | |
| Aroclor 1248 | | | 310 D08,QSU | 290 QSU,D08 | 120 D08,QSU,J | 79 QSU | 44 QSU | | | |
| Aroclor 1260 | | | 1,500 D08,QSU | 1,700 QSU,D08 | 830 D08,QSU | 450 QSU | 230 QSU | 14 QSU,J | | |
| Totoal PCBs | 1,000 | 25,000 | 1,810 | 1,990 | 950 | 529 | 274 | 14 | | |

Notes:

Only those analytes detected at a minimum of one location are shown. Blank cells indicate non-detect.

B - Analyte detected in assocaited method blank

D08 - Dilution required due to high concentration of target analyte

J - Estimated value, analyte less than reporting limit but greater than method detection limit

QSU - Sulfur clean-up performed on extract

-Bold value indicates exceedance of Industrial SCO.

-Shaded value indicates exceedance of Commercial SCO.

5. Remedial Investigation Methods and Results

Field activities of the Remedial Investigation were completed between October 14 and December 16, 2009. Tasks were conducted in accordance with the NYSDEC-approved RI/IRM Work Plan (Malcolm Pirnie, July 2009).

The Remedial Investigation included the following field tasks:

- Excavation and sampling of 18 test pits.
- Drilling and sampling of 88 soil borings.
- Installation and development of five groundwater monitoring wells.
- Collection and analysis of soil vapor, surface and subsurface soil/fill, solid waste, and groundwater samples for laboratory analysis.
- Site survey for creation of a to-scale Site base map with Site features, topography, and well and sample locations.
- Water level measurement and mapping.

Detailed discussions of the purpose, methodologies, and results of each of the investigative activities completed are presented in the following subsections. Analytical results are presented and discussed in Section 7.0. Photographs of the Site were taken during the Site investigation field tasks, some of which are presented in Appendix B.

5.1. Test Pit Excavation

5.1.1. Purpose

Test pits were excavated to provide visual observation of the thickness and composition of the soil/fill material, the underlying native soil, groundwater conditions, and to obtain samples of the soil/fill material for chemical analysis.

5.1.2. Methods

A subcontracted excavator and crew excavated test pits at 19 pre-determined locations through the soil/fill material. Test pits were terminated at just beneath the contact with the underlying native soil. A Malcolm Pirnie geologist was present during all excavation activities to monitor the atmosphere for VOCs using a photoionization meter (PID), to observe and record the composition of the fill material and hydrogeologic conditions and to collect samples of the soil/fill for chemical analysis. Upon completion of field logs and sample collection at each test pit location, the pit was backfilled with the same soil/fill material as was removed.





5.1.3. Results

Test pit depths ranged from three to five feet. Soil/fill was encountered at each of the 18 test pit locations at thicknesses between 0.5 foot and 3.7 feet. The visual appearance and composition of the Soil/fill was generally similar across the Site as described in Section 2.2. One notable exception to this was at Test Pit #5 located in the extreme northeastern corner of the Site, on the 1146 Seneca Street property. At this location the soil/fill was thicker and more similar in color and composition as the underlying soil. Also, a distinct solvent/phenolic odor was noted during excavation of this test pit. Additional samples were collected of the soil/fill at this location but neither VOCs nor SVOCs were detected at concentrations above SCOs for restricted commercial use. It was revealed by the BCP applicant that the location of this test pit is within an area of past soil/fill remediation. See Appendix A for a copy of the investigation and soil removal action that was completed in this area.

Test pit locations are illustrated on Figure 5-1 and test pit findings including fill thickness and PID readings are provided in Table 5-1. Analytical results of the 16 surface and subsurface soil/fill samples collected from test pits are presented and discussed in Section 7.

5.2. Drilling and Sampling of Soil Borings

5.2.1. Purpose

A soil boring program was conducted to establish the thickness and physical and chemical composition of the fill material present at the Site as well as to install temporary groundwater monitoring wells to assess groundwater quality and hydrogeologic conditions.

5.2.2. Methods

Six soil borings were advanced through unconsolidated overburden fill and soils using 3-1/4-inch inside diameter (ID) hollow stem augers. Locations of the test borings are shown on Figure 5-1. The drilling rig used to complete the test borings was provided and operated by a subcontractor to Malcolm Pirnie. At each test boring location, continuous two-inch outer diameter (OD) split-spoon samplers were used to collect soil cores which were screened with a photo ionization detector (PID) to obtain a qualitative estimate of total volatile organic compounds (VOCs) emitted from the subsurface soil/fill. The on-Site Malcolm Pirnie geologist recorded the PID measurements, physical characteristics of the soil, depth to groundwater, and other notable conditions on Field -Boring Log forms at each test boring location. The split spoon samplers were decontaminated prior to each use using a solution of Alconox and water followed by a clean potable water rinse. All soil borings not converted to monitoring wells were backfilled with the drill cuttings.





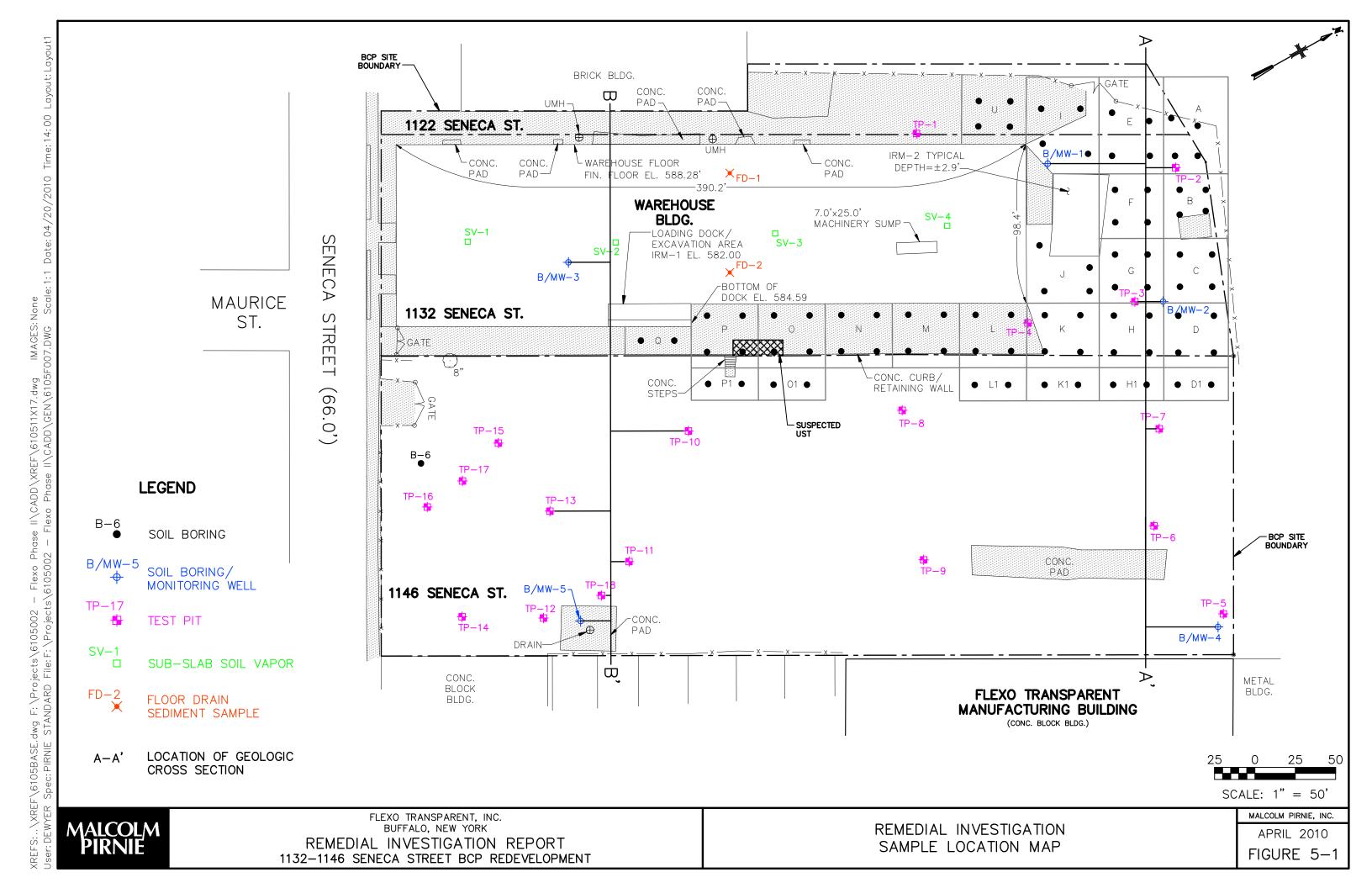


Table 5-1 Test Pit and Borehole Summary 1132-1146 Seneca Street Site Buffalo, NY

| Test Dit/ Dershele | Dete | | I otal | Annuay Douth | |
|------------------------------|---------------------------|------------------------|---------------|------------------------------|---|
| Test Pit/ Borehole Number | Date Excavated/Drilled | Fill Thickness (ft) | Depth (ft) | Approx. Depth to Groundwater | Maximum PID Measurement / Comments |
| | 10/14/2009 | . , | · · / | | |
| TP-1 TP-2 | 10/14/2009 | 2.5 | 3.3 | NA | 0 PPM |
| TP-2 TP-3 | 10/14/2009 | 2.2 1.6 | 3.2 3.1 | 2.2 1.6 | 0 PPM/Perched water at native soil contact |
| TP-3 TP-4 | | - | - | - | 0 PPM/Perched water at native soil contact |
| 1P-4 | 10/14/2009 | 1.7 | 2.4 | 1.7 | 0 PPM/Perched water at native soil contact |
| TP-5 | | 3.7 | 5.1 | 3.7 | 0 PPM but strong solvent odor in fill/2.1 PPM in native soil less odor/Perched water at |
| IF-J | 10/14/2009 | 5.7 | 5.1 | 5.7 | native soil contact |
| TP-6 | 10/14/2009 | 3.7 | 4.8 | 3.7 | 0 PPM/Perched water at native soil contact |
| TP-7 | 10/15/2009 | 2.3 | 4.5 | 2.3 | 0 PPM/Perched water at native soil contact |
| TP-8 | 10/15/2009 | 1.2 | 2.7 | 1.2 | 0 PPM/Perched water at native soil contact |
| TP-9 | 10/15/2009 | 2.7 | 3.8 | NA | 0 PPM |
| TP-10 | 10/15/2009 | 0.8 | 2.5 | NA | 0 PPM |
| TP-11 | 10/15/2009 | 1.4 | 2.8 | NA | 0 PPM |
| TP-12 | 10/15/2009 | 0.5 | 3 | NA | 0 PPM |
| | 10/10/2000 | | - | | 0 PPM/ N-S trending 2" diam. Soil filled Steel |
| TP-13 | 10/15/2009 | 1.5 | 3.2 | NA | pipe encountered |
| TP-14 | | 1.4 | 3.8 | NA | 0 PPM |
| TP-14 TP-15 | 10/15/2009 10/16/2009 | | | | |
| | | 2.4 | 3.4 | NA | 0 PPM |
| TP-16 | 10/16/2009 | 1.2 | 3.2 | NA | |
| TP-17 | 10/16/2009 10/16/2009 | 0.5 | 3.2 | NA | 0 PPM |
| TP-18 | 10/19/2009 | 1.2 | 3.4 | NA | 0 PPM |
| B-1 B-2 | 10/19/2009 | 1.7 1.1 | 8.0' | NA NA | 0 PPM 0 PPM |
| <u>В-2</u> В-3 | 10/19/2009 | 0.3 bc | 8 | NA NA | 0 PPM 0 PPM |
| <u>в-з</u> В-4 | 10/19/2009 | 4.2 | 8 | NA | 0 PPM |
| <u>В-4</u> В-5 | 10/19/2009 | 0.4 bc | 9.8 | 5 | 0 PPM/ Bedrock refusal at 9.8' |
| B-6 | 10/19/2009 | 0.4 DC | 9.8 | 4 | 0 PPM/Bedrock refusal at 9.9 |
| D-0 | 10/10/2000 | ů. | | ATION BORINGS | |
| A1 | 12/16/2009 | 1.2 | 4 | ATION BORINGS | 0 PPM |
| A2 | 12/16/2009 | 2 | 4 | | 0 PPM |
| A3 | 12/16/2009 | 1.1 | 4 | | 0 PPM |
| A4 | 12/16/2009 | 1.1 | 4 | | 0 PPM |
| B1 | 12/15/2009 | 1.8 | 4 | | 0 PPM |
| B2 | 12/15/2009 | 1.3 | 4 | | 0 PPM |
| B3 | 12/15/2009 | 1.2 | 4 | | 0 PPM |
| B4 | 12/15/2009 | 1 | 4 | | 0 PPM |
| C1 | 12/15/2009 | 1.5 | 4 | | 0 PPM |
| C2 | 12/15/2009 | 2 | 4 | | 0 PPM |
| C3 | 12/15/2009 | 1 | 4 | | 0 PPM |
| C4 | 12/15/2009 | 1 | 4 | | 0 PPM |
| D1 | 12/15/2009 | 1.9 | 4 | | 0 PPM |
| D2 | 12/15/2009 | 1.3 | 4 | | 0 PPM |
| D3 | 12/15/2009 | 1.8 | 4 | | 0 PPM |
| D4 | 12/15/2009 | 0.6 | 4 | | 0 PPM |
| E1 | 12/16/2009 | 1.6 | 4 | | 0 PPM |
| E2 | 12/16/2009 | 1.2 | 4 | | 0 PPM |
| E3 | 12/16/2009 | 1.7 | 4 | | 0 PPM |
| | | | | | 0 PPM, petro sheen at 0.8' to 1.1', sampled |
| E4 | 12/16/2009 | 2 | 4 | | for PCBs, VOCs, and SVOCs. |
| F1 | 12/15/2009 | 1 | 4 | | 0 PPM |
| F2 | | 2 | 4 | | 0 PPM |
| F3 | | 2 | 4 | | 0 PPM |
| F4 | | 1 | 4 | | 0 PPM |
| G1 | 12/15/2009 | 1 | 4 | | 0 PPM |
| G2 | 12/15/2009 | 1 | 4 | | 0 PPM |
| G3 G4 | 12/15/2009 12/15/2009 | 1.8 1.5 | 4 | | 0 PPM 0 PPM |
| | | | . 1 | 1 | |

Table 5-1Test Pit and Borehole Summary1132-1146 Seneca Street SiteBuffalo, NY

| | | | | l otal | | |
|----------------|--------------|--------------------------|------------------|--------|----------------|------------------------------------|
| Test Pit/ Bore | | Date | Fill Thickness | Depth | Approx. Depth | |
| Number | • | Excavated/Drilled | (ft) | (ft) | to Groundwater | Maximum PID Measurement / Comments |
| H1 | | 12/15/2009 | 1.5 | 4 | | 0 PPM |
| H2 | | 12/15/2009 | 1 | 4 | | 0 PPM |
| H3 | | 12/15/2009 | 2.3 | 6 | | 0 PPM |
| H4 | 14 | 12/15/2009 | 0.5 | 4 | | 0 PPM |
| | 1 2 | 12/16/2009 12/16/2009 | 2.3 | 4 | | 0 PPM 0 PPM |
| | 12 | 12/16/2009 | 2.5 | 4 | | 0 PPM |
| | 13 | 12/16/2009 | 1.6 | 4 | | 0 PPM |
| J1 | | 12/15/2009 | 1.3 | 4 | | 0 PPM |
| J2 | | 12/15/2009 | 2 | 4 | | 0 PPM |
| J3 | | 12/15/2009 | 1.5 | 4 | | 0 PPM |
| J4 | | 12/15/2009 | 1 | 4 | | 0 PPM |
| K1 | | 12/15/2009 | 2 | 4 | | 0 PPM |
| K2 | | 12/15/2009 | 0.3 | 4 | | 0 PPM |
| K3 | | 12/15/2009 | 1.5 | 4 | | 0 PPM |
| K4 | | 12/15/2009 | 0.2 bc | 4 | | 0 PPM |
| | L1 | 12/15/2009 | 2 | 4 | | 0 PPM |
| | L2 | 12/15/2009 | 0.3 bc | 4 | | 0 PPM |
| | L3 | 12/15/2009 | 1 | 4 | | 0 PPM |
| | L4 | 12/15/2009 | 0.5 bc | 4 | | 0 PPM |
| M1 M2 | | 12/14/2009 12/14/2009 | 1.5 bc 0.2 bc | 4 | | 0 PPM 0 PPM |
| M3 | | 12/14/2009 | 0.2 bc | 4 | | 0 PPM 0 PPM |
| M4 | | 12/14/2009 | 0.3 bc | 4 | | 0 PPM |
| N1 | | 12/14/2009 | 1.5 | 4 | | 0 PPM |
| N2 | | 12/14/2009 | 0.3 bc | 4 | | 0 PPM |
| N3 | | 12/14/2009 | 1.5 | 4 | | 0 PPM |
| N4 | | 12/14/2009 | 0.4 | 4 | | 0 PPM |
| | 01 | 12/14/2009 | 1 bc | 4 | | 0 PPM |
| | 02 | 12/14/2009 | 0.2 bc | 4 | | 0 PPM |
| | O3 | 12/14/2009 | 1 bc | 4 | | 0 PPM |
| | 04 | 12/14/2009 | 1.8 bc | 4 | | 0 PPM |
| P1 | | 12/14/2009 | 2 | 4 | | 0 PPM |
| P2 | | 12/14/2009 | 3.7 bc | 4.5 | | 0 PPM |
| P3 | | 12/14/2009 | 2.6 | 6 | | 0 PPM |
| P4 | | 12/14/2009 | 1.2 | 4 | | 0 PPM |
| D1-1 | | 3/18/2010 | 1.4 | 4 | | 0 PPM |
| D1-2 | 114.4 | 3/18/2010 | 1.3 | 4 | | 0 PPM |
| | H1-1 H1-2 | 3/18/2010 3/18/2010 | 1.4 2 | 4 | | 0 PPM 0 PPM |
| K1-1 | 111-2 | 3/18/2010 | 1.7 | 4 | | 0 PPM |
| K1-2 | | 3/18/2010 | 1.6 | 4 | | 0 PPM |
| L1-1 | | 3/18/2010 | 1.0 | 4 | | 0 PPM |
| L1-1 | | 3/18/2010 | 1.4 | 4 | | 0 PPM |
| L12 | 01-1 | 3/18/2010 | 0.7 | 4 | | 0 PPM |
| | 01-2 | 3/18/2010 | 0.6 | 4 | | 0 PPM |
| P1-1 | | 3/18/2010 | 1.1 | 4 | | 0 PPM |
| P1-2 | | 3/18/2010 | 0.7 | 4 | | 0 PPM |
| Q1 | | 3/18/2010 | 0.2 bc | 4 | | 0 PPM |
| Q2 | | 3/18/2010 | 0.1 bc | 4 | | 0 PPM |
| | U1 | 3/18/2010 | 1.8 | 4 | | 0 PPM |
| | U2 | 3/18/2010 | 1.8 | 4 | | 0 PPM |
| | U3 | 3/18/2010 | 1.6 | 4 | | 0 PPM |
| | U4 | 3/18/2010 | 1.5 | 4 | | 0 PPM |
| | | | | | | |
| bc = thick | ness o | f fill beneath concrete | pavement. | | | |
| | | | | | | |

Borehole depths ranged from 4.0 feet to 9.9 feet below ground surface (bgs). A description of the geologic conditions encountered during the drilling program is provided in Section 2, and borehole logs with detailed overburden descriptions and other observations are provided in Appendix D. A summary of the total depths of each soil boring, as well as the fill thickness and intervals selected for analytical sampling are presented in Table 5-1.

5.2.3. Results

Soil/fill was encountered at each of the six soil boring locations, including B-3 which was located within the Site building. Fill thicknesses encountered at drilling locations ranged from as thin as 0.3 feet beneath the building concrete floor slab at B-3, to 4.2 feet at B-4. Perched groundwater was present at boring locations B-1, B-2, B-5, and B-6. Borings B-3 and B-4 were dry at the time of drilling. Bedrock was encountered at the two deepest borings, B-5 and B-6, at depths of 9.8 feet and 9.9 feet respectively.

5.3. Installation, Development, and Sampling of Groundwater Monitoring Wells

5.3.1. Purpose

Temporary shallow groundwater monitoring wells were installed throughout the site to provide means to collect groundwater samples for chemical analysis and to measure groundwater elevations.

Five groundwater monitoring wells were installed during the RI to provide hydrogeologic and water quality data at the Site. Groundwater samples and elevation data were collected from these on-Site wells.

Monitoring wells were constructed of 1-inch ID, flush joint, Schedule 40 PVC, with 0.010-inch slotted screen ranging in lengths between three and eight feet. A silica sand filter pack was placed up to two feet above the top of the screened interval. A one-foot thick layer of bentonite granules was placed above the sand pack to grade as a seal to prevent the downward infiltration of surface water.

Monitoring wells were installed in overburden with the upper most part of the screened interval within the soil/fill layer. Total well depths range from 4.0 to 9.8 feet bgs. A summary of well construction details is presented in Table 5-2. Detailed well construction diagrams and borehole logs with geologic descriptions for the wells are presented in Appendix D.

The newly installed wells were developed to flush the well and sand pack of fine sediments, create wells that will yield water samples that are representative of the groundwater quality at that location, and to provide accurate measurement points for groundwater elevations. Wells were developed using a peristaltic pump attached to







TABLE 5-2 SUMMARY OF MONITORING WELL CONSTRUCTION DETAILS REMEDIAL INVESTIGATION REPORT 1132-1146 SENECA STREET SITE BUFFALO, NEW YORK

| Well No. | Screen Diam. <i>(in)</i> | Slot Size <i>(in)</i> | Well Material | Borehole Diameter <i>(in)</i> | Borehole Depth <i>(ft bgs)</i> | Screened Interval (ft bgs) | Date Installed |
|----------|--------------------------------|-----------------------------|------------------|-------------------------------------|--------------------------------------|----------------------------------|-------------------|
| B-1 | 1 | 0.010 | PVC | 6.5 | 8.0 | 1.0 - 8.0 | 10/19/2009 |
| B-2 | 1 | 0.010 | PVC | 6.5 | 8.0 | 1.0 - 7.0 | 10/19/2009 |
| B-3 | 1 | 0.010 | PVC | 3.0 | 4.0 | 1.0 - 4.0 | 10/19/2009 |
| B-4 | 1 | 0.010 | PVC | 6.5 | 8.0 | 3.0 - 8.0 | 10/19/2009 |
| B-5 | 1 | 0.010 | PVC | 6.5 | 9.8 | 1.8 - 9.8 | 10/19/2009 |

bgs - below ground surface.

dedicated polyethylene tubing. Groundwater evacuated from each well during development was monitored for pH, specific conductivity, temperature, dissolved oxygen, ORP, and turbidity. Development water was discharged to the ground surface. Well Development/Purging Logs are included in Appendix E.

5.4. Sampling of Environmental Media

5.4.1. Surface and Subsurface Soil/Fill

5.4.1.1. Surface Soil Sampling

Purpose

To better characterize surface soils within the BCP Site boundaries, the uppermost 2 inches of soil/fill was sampled at nine sampling locations chosen to represent conditions unique to specific areas and/or proximity to known contaminant impacts.

Method

Surface soil samples were collected from split spoon samplers at soil boring locations or from excavation sidewalls at test pit locations. Surface soil samples were submitted for analysis of Target Compound List (TCL) Volatile Organic Compounds (VOCs), Semi Volatile Organic Compounds (SVOCs), polychlorinated biphenyls (PCBs) and target analyte list (TAL) metals with cyanide. Surface soil samples were collected at test pit locations TP-2, TP-3, TP-5, TP-7, TP-9, TP-10, TP-13, and TP-14 and at soil boring B-2. Figure 5-1 shows the locations of all test pits and soil borings sampled as part of the RI.

Results

The uppermost material at each location sampled was disturbed soil/fill material, not native soil deposits. No PID readings above background or other evidence of contamination was noted during the collection of the surface soil/fill samples. Presentation of sample analytical results is provided in Section 7.

Based on the analytical results of surface soil samples collected from the 1146 Seneca Street property from which three of six samples contained benzo(a)pyrene (BAP) at concentrations greater than the industrial SCO of 1.1 mg/kg, additional surface soil samples were collected from this property to further characterize the extent of BAP contamination in the surface soil. The entire 1146 Seneca Street property was divided into 44 equal sized grid squares of approximately 45 feet x 46 feet. A single grab sample was collected from the surface soil (upper 2"depth) from within each grid square, with the exception of the six grid squares that were previously sampled during the RI. Each sample was submitted for analysis of benzo(a)pyrene. Analytical results are presented and discussed in Section 7





5.4.1.2. Subsurface Soil

Purpose

A test pit and soil boring program was completed to further characterize areas of concern identified during previous Site investigations and to better characterize the overall Site soil/fill material and shallow groundwater, where present.

Methods

As part of the original RI scope of work, 18 test pits were excavated and six soil borings drilled at predetermined Areas of Concern (AOCs) and at other locations of the BCP Site that have not yet been fully characterized. Test pits and borings were advanced through the soil/fill layer and into native silt/clay. At two boring locations (B-5 and B-6) the borehole was extended to bedrock refusal. Subsurface soil samples were submitted for analysis of TCL VOCs, SVOCs, PCBs and TAL metals with cyanide. Subsurface soil samples were collected at test pit locations TP-1, TP-2, TP-3, TP-4, TP-5, TP-8, and TP-18 and at soil borings B-2, B-3, and B-5. After logging and sampling the overburden materials at each test pit location, the test pits were backfilled using the materials removed. Figure 5-1 shows the locations of all test pits and soil borings sampled as part of the RI.

Results

Based on the analytical results of the above mentioned subsurface samples, further delineation of PCB-impacted soil/fill was warranted. Second and third phases of characterization were performed primarily on the 1132 property. At total of 82 additional soil borings were drilled and sampled on a grid pattern to the north, west, and east of the former manufacturing building to quantify the magnitude and delineate the extent of PCB contamination. Borings were drilled at approximate 20-feet spacing and samples composited one per every four borings. Figure 5-1 shows the location of the pre-characterization sampling grid and borings. Based on the analytical results of the initial RI test pit and boring samples, the uppermost six inches of soil was sampled separately from the underlying fill material. Results of the third sampling event indicated that the extent had been sufficiently delineated to identify and evaluate remedial alternatives. Complete discussion of the analytical results of subsurface soil samples is provided in Section 7.

At one of the pre-characterization soil boring locations (P-2) in the general area of the rail access loading dock, thick (3-feet) concrete pavement was encountered beneath which a six feet void was present. The void was water filled and a slight petroleum odor was noted and a PID reading of 23.9 measured at the boring. It is assumed that there is a buried underground storage tank at this location.





5.4.2. Groundwater

5.4.2.1. Purpose

Where present in temporary groundwater monitoring wells, groundwater samples were collected to characterize the groundwater quality.

5.4.2.2. Method

Wells were purged and sampled using low flow sampling techniques by dedicated plastic flex tubing and a peristaltic pump. New dedicated disposable bailers were used to collect the VOC portion of the groundwater samples. Each was sampled for TCL VOCs, SVOCs, Pesticides, PCBs, TAL metals, and cyanide.

Groundwater field parameters were monitored during well purging prior to sampling including pH, specific conductivity, temperature, turbidity, dissolved oxygen, appearance and ORP.

Groundwater samples were collected in precleaned and pre-preserved laboratory sample bottles in accordance with protocols for the applicable analyses. Appropriate QA/QC samples were collected for the groundwater sampling event including one trip blank, one MSD, and one field duplicate sample. Subsequent to sample collection, groundwater samples were placed on ice and shipped under chain of custody to Test America Laboratory.

5.4.2.3. Results

Groundwater was not present in well B/MW-3 located inside of the manufacturing building. Also, well B/MW-4 was initially dry but when checked for water on a subsequent day, water was present and so sampled. Analytical results are presented in Section 7.

5.4.3. Soil Vapor

5.4.3.1. Purpose

Soil vapor was sampled from beneath the concrete floor slap of the Site building to determine of VOCs are present in the soil vapor beneath the building and if so if their concentrations are elevated to pose a potential migration pathway to indoor air.

5.4.3.2. Method

Soil vapor samples were collected at four locations (SV-1 through SV-4) from beneath the concrete floor slab foundation of the building at 1132 Seneca Street. Samples were collected in accordance with the Department-approved work plan using a 6-liter Summa canister sampling train, which consists of a stainless steel Summa canister, flow controller, particulate filter, pressure gage, and fittings. Canisters were evacuated and certified as analyte-free by the analytical laboratory (Test America Laboratories) prior to





use in the field. Flow regulators supplied by the analytical laboratory were used to allow for continuous sampling over the one-hour period. Each flow regulator was equipped with a filter to prevent particulate matter from entering the canister.

5.4.3.3. Results

The concrete floor was observed to be in good condition with no cracks or holes noted. Trace levels of various VOCs were detected, see Section 7 for a detailed discussion of analytical findings.

5.4.4. Floor Drain/Pipe Chase Debris

5.4.4.1. Purpose

At the request of the Department, loose dry sediment/debris was sampled from within a east/west oriented concrete lined trough-like feature within the floor of the manufacturing building. This trough contained a series of parallel steel pipes approximately two to three inches in diameter. The bottom of the concrete trough contained loose soil-like debris such as floor sweepings or sediment. Samples were collected to determine if PCBs were present in this material.

5.4.4.2. Method

Two samples (FD-1 and FD-2) of the sediment material were collected at opposite ends of the trough using dedicated stainless steel spoons to fill sample containers provided by the Laboratory. Figure 5-1 shows the locations at which the two samples were collected and Appendix B contains photos of the floor trough and sample locations.

5.4.4.3. Results

The material sampled from beneath the pipes was medium gray in color, very dry, very loose, and light weight. The trough did not appear to be used for drainage for the building floor but to house pipes below grade. The trough was covered with a multiple segmented removable steel cover. Analytical results of the two samples indicate that elevated concentrations of PCBs are present in this "sediment" material.

Sample FD-1 (west) contained 1804 PPM of total PCBs and sample FD-2 (east) contained 25 PPM of total PCBs.

5.5. Site Survey and Base Map Preparation

Upon completion of all Remedial Investigation field tasks, Wendel Duchscherer of Lockport, New York, performed a land survey of the Site that included Site property boundaries, relevant Site features, topography, and drilling, excavation, and sample points. This information was used to generate a Site base map and report figures for the RI report. Ground control was established on Site that includes USGS vertical control and NY State Plane Coordinates for horizontal control. The base map developed for the





Site, Figure 1-2, covers the entire Site area of 4-acre study area, including the pending 1122 Seneca Street parcel.





Environmental samples were collected from on-Site oil/fill, groundwater, and soil vapor media during the Remedial Investigation and the two Interim Remedial Measures. The samples were collected for purposes of Site-wide characterization, confirmation of IRMs, and pre-characterization for anticipated removal of impacted soil/fill.

Site-Wide Characterization - Soil/fill and groundwater samples collected for Site-wide characterization were analyzed for target compound list (TCL) VOCs, TCL SVOCs, PCBs, target analyte list (TAL) metals, and cyanide. Sub-slab soil vapor samples were analyzed for VOCs.

Confirmation of IRMs - Soil/fill samples collected for confirmation of IRM removal actions (excavation sidewall and bottom samples) were analyzed for PCBs.

Pre-Characterization Samples – Soil/fill samples collected for pre-characterization of areas where additional removal of impacted material is likely were analyzed for PCBs on the 1122 and 1132 Seneca Street properties and for BAP on the 1146 Seneca Street property.

All soil and groundwater samples, except those collected for the second of two phases of the PCB pre-characterization sampling and the BAP pre-characterization , were sent to Test America, of Buffalo, New York. Soil samples collected during the second phase of the PCB pre-characterization and the BAP pre-characterization were analyzed by Paradigm Environmental, Inc. of Rochester, New York.

Subsurface soil vapor samples were submitted to Test America Laboratories of Burlington, Vermont for VOC analysis.

Environmental Quality Associates, Inc. (EQA), a qualified data validator, performed third-party validation of the soil, groundwater, and soil vapor analytical results collected during the RI. The data validation was conducted in accordance with the guidelines established by NYSDEC's Data Usability Summary Review (DUSR) process. The DUSR process was performed to provide a determination of whether the data meets the project specific criteria for data quality and data use.

Laboratory data summary forms were reviewed by the validator for application of validation qualifiers, per the USEPA Region 2 validation SOPs and the USEPA National Functional Guidelines for Data Review, with consideration of the requirements of the project Work Plan. The following criteria were reviewed:





- Laboratory narrative discussions.
- Case narratives
- Custody Documentation
- Holding times
- Surrogate and internal standard recoveries
- Matrix spike recoveries/duplicate correlations
- Field duplicate correlations
- Preparation/calibration blanks
- Matrix spiked blanks/laboratory control samples
- Calibration/CRI/CRA standards
- ICP interference check standards
- ICP serial dilution correlations
- Method compliance
- Sample result verification

Data Review Reports were prepared for sample delivery groups (SDGs) and are attached to this report as Appendix F. The Data Review Reports provide copies of the laboratory analytical results and descriptions of the criteria used to review the laboratory results and supporting quality control documentation. Analytical and validation results of the BAP pre-characterization sampling had not been received prior to submittal of this Draft report but will be included in the final RIR/RWP.

All data were deemed acceptable by the data validator, incorporating data qualifiers as appropriate.

The usability of the data, as assessed by the data validator, is presented in detail in the Data Usability Summary Reports provided in Appendix F. The data summary tables presented in Section 7 of the report use analytical results that have been validated, and when used in conjunction with historical data, provide the basis for Site evaluation and recommendations.





7.1. Introduction

The nature and extent of contamination at the1132-1146 Seneca Street Site was characterized through collection and analysis of surface and subsurface soil/fill, groundwater, and soil vapor samples as part of this remedial investigation. Sampling methodologies were performed in accordance with the NYSDEC and NYSDOHapproved Remedial Investigation/Interim Remedial Measures Work Plan (Malcolm Pirnie, Inc., July, 2009). Sampling protocols and methodologies for each sampled media are described in Section 4.0 of this report. Subsurface soil/fill and groundwater samples collected during the RI sampling events completed during October 2009 were submitted for analyses under chain-of-custody to Severn Trent Laboratory of Buffalo, New York. Soil vapor samples collected during the investigation were submitted for analyses under chain-of-custody to Severn Trent Laboratories of Burlington, Vermont. Phase II RI soil/fill characterization samples both PCBs and benzo(a)pyrene were analyzed by Paradigm Environmental Services, Inc. of Rochester, New York. Analytical services provided by all three laboratories were performed in accordance with the most current SW-846 and ASP2000 analytical methods and protocols. Appendix F contains Data Usability Summary Reports and a compact disc (CD) with analytical results as presented by the laboratories for all data collected under the RI and IRMs. Sampling locations and frequency of collection were based on observed Site conditions and review of the historical environmental data described in Section 3. Sampling locations for all media are provided on Figure 5-1.

The RI investigation included collection of nine surface soil/fill samples (0 to 2" depth) 10 subsurface soil/fill samples (> 2" depths), four shallow groundwater samples, four sub slab soil vapor samples, and two sediment/waste samples from a sub-grade pipe chase. Analytical results were utilized for overall Site contaminant characterization. Based on the results of the initial surface and subsurface soil/fill samples, some of which contained unexpectedly elevated levels of PCBs, a two-phased focused precharacterization of the magnitude and extent of the impacted soil/fill was completed. This pre-characterization included the collection of 47 samples for PCBs as described in Section 5. Also, elevated concentrations of BAP prompted a similar pre-characterization sampling for BAP on the 1146 Seneca Street parcel involving an additional 38 surface soil samples collected in a grid pattern over the entire parcel. Analytical results of all samples collected during the RI and pre-characterization are discussed in this section and are presented in Tables 7-1 through 7-7.







TABLE 7-1 Remedial Investigation Surface Soil - Organic Results 1132-1146 Seneca Street Site Buffalo, NY

| Sample ID Sample Depth (inches BGS) Sample Date | Restricted Use Soil Cleanup Objectives - Commercial | Restricted Use Soil Cleanup Objectives - Industrial | TP-2 0-2 10/14/2009 | TP-3 0-2 10/14/2009 | TP-5 0-2 10/14/2009 | TP-7 0-2 10/15/2009 | TP-9 0-2 10/15/2009 | TP-10 0-2 10/15/2009 | TP-13 0-2 10/15/2009 | TP-14 0-2 10/15/2009 | B-2 0.0-2 10/19/2009 |
|--|--|--|---------------------------|---------------------------|---------------------------|---------------------------|---------------------------|----------------------------|----------------------------|----------------------------|----------------------------|
| Volatiles Organic Compour | nds (µg/kg) | | | | | | | | | | |
| 1,2,4-Trichlorobenzene | | | | | 4.6 J | | | | | | - |
| Methylene Chloride | 500,000 ^b | 1,000,000 ^c | 20 | 3.6 J | 1.5 J | | | | | | - |
| Semi-Volatiles Organic Compounds (µg/kg) | | | | | | | | | | | |
| 2-Methylnaphthalene | | | | | 910 D12,J | | | | | | |
| 4-Methylphenol | 500,000 ^b | 1,000,000 ^c | | | | | | | 4,800 D10 | | |
| Acenaphthene | 500,000 ^b | 1,000,000 ^c | | | 2,600 D12,J | | | | | | |
| Anthracene | 500,000 ^b | 1,000,000 ^c | | | 4,300 D12,J | | | | | 180 D10,J | |
| Benzo(a)anthracene | 5,600 | 11,000 | 4,400 T10,D12,J | 890 D12,J | 7,900 D12,J | 430 D10,J | 1,800 D12,M4,J | 750 D10,J | 240 D10,J | 660 D10,J | 460 D10,J |
| Benzo(a)pyrene | 1,000 ^f | 1,100 | | 970 D12,L1,J | 6,100 D12,L1,J | 500 D10,J | 3,300 D12,M4,J | 1,500 D10,J | 250 D10,J | 700 D10,J | |
| Benzo(b)fluoranthene | 5,600 | 11,000 | 6,900 T10,D12,J | 1,600 D12,J | 9,900 D12,J | 660 D10,J | 3,100 D12,M4,J | 1,000 D10,J | 370 D10,J | 1,100 D10,J | 640 D10,ID4,J |
| Benzo(ghi)perylene | 500,000 ^b | 1,000,000 ^c | | 740 D12,J | 3,200 D12,J | 490 D10,J | 2,100 D12,M4,J | 1,100 D10,J | | 430 D10,J | |
| Benzo(k)fluoranthene | 56,000 | 110,000 | | | | | | 310 D10,J | | | |
| Carbazole | | | | | 2,200 D12,J | | | | | | |
| Chrysene | 56,000 | 110,000 | 3,700 T10,D12,J | 780 D12,J | 7,800 D12,J | 470 D10,J | 3,100 D12,M4,J | 940 D10,J | 220 D10,J | 670 D10,J | 370 D10,J |
| Dibenzofuran | 350,000 | 1,000,000 ^c | | | 1,600 D12,J | | | | | | |
| Fluoranthene | 500,000 ^b | 1,000,000 ^c | 9,300 T10,D12,J | 1,400 D12,J | 18,000 D12 | 490 D10,J | 2,200 D12,M4,J | 1,000 D10,J | 350 D10,J | 1,300 D10,J | 690 D10,J |
| Fluorene | 500,000 ^b | 1,000,000 ^c | | | 2,600 D12,J | | | | | | |
| Indeno(1,2,3-cd)pyrene | 5,600 | 11,000 | | 630 D12,J | 2,900 D12,J | 260 D10,J | 1,000 D12,M4,J | 450 D10,J | 120 D10,J | 360 D10,J | |
| Phenanthrene | 500,000 ^b | 1,000,000 ^c | 5,700 T10,D12,J | 600 D12,J | 21,000 D12 | 290 D10,J | 1,500 D12,M4,J | 650 D10,J | 270 D10,J | 920 D10,J | 440 D10,J |
| Pyrene | 500,000 ^b | 1,000,000 ^c | 7,500 T10,D12,J | 1,200 D12,J | 15,000 D12 | 550 D10,J | 4,000 D12,M4,J | 990 D10,J | 270 D10,J | 1,100 D10,J | 570 D10,J |
| PCB (µg/kg) | | | | | | | | | | | |
| Aroclor 1248 | | | | | | | | | | | 7,800 D08,J |
| Aroclor 1254 | | | | 17,000 D08,QSU | 68 QSU | 880 D08 | 270 | 160 | 56 | 65 | |
| Aroclor 1260 | | | 140,000 D08,QSU | 33,000 D08,QSU | 30 QSU | 550 D08 | 240 | 94 | 24 | 48 | 40,000 D08 |
| Totoal PCBs | 1,000 | 25,000 | 140,000 | 50,000 | 98 | 1,430 | 510 | 254 | 80 | 113 | 47,800 |

Notes:

Only those analytes detected at a minimum of one location are shown. Blank cells indicate non-detect.

D08 - Dilution required due to high concentration of target analyte

D10 - Dilution required due to sample color

D12 - dilution required due to sample viscosity

J - Estimated value, analyte less than reporting limit but greater than method detection limit

QSU - Sulfur clean-up performed on extract

T10 - Sample had an adjusted final volume during extraction due to extract matrix or viscosity

-Bold value indicates exceedance of Industrial SCO.

-Shaded value indicates exceedance of Commercial SCO.

Restricted Use Footnotes

b - The SCOs for commercial use were capped at a maximum value of 500 ppm (500,000 ppb).

c - The SCOs for industrial use and the protection of groundwater were capped at a maximum value of 1000 ppm (1,000,000 ppb).

f - For constituents where the calculated SCO was lower than the rural soil background concentration as determined by the Department of Health rural soil survey, the rural soil back ground concentration is used as the Track 2 SCO value for this site.



TABLE 7-2 Remedial Investigation Surface Soil - Metal Results 1132-1146 Seneca Street Site Buffalo, NY

| Sample ID Sample Depth (inches BGS) Sample Date | Restricted Use Soil Cleanup Objectives - Commercial | Restricted Use Soil Cleanup Objectives - Industrial | TP-2 0-2 10/14/2009 | TP-3 0-2 10/14/2009 | TP-5 0-2 10/14/2009 | TP-7 0-2 10/15/2009 | TP-9 0-2 10/15/2009 | TP-10 0-2 10/15/2009 | TP-13 0-2 10/15/2009 | TP-14 0-2 10/15/2009 | B-2 0.0-2 10/19/2009 |
|--|--|--|---------------------------|---------------------------|---------------------------|---------------------------|---------------------------|----------------------------|----------------------------|----------------------------|----------------------------|
| Metals (mg/kg) | | | | | | | | | | | |
| Aluminum | | | 5,460 | 5,100 | 10,800 | 9,560 B | 9,840 B | 9,040 B | 8,550 B | 9,090 B | 7,960 |
| Antimony | | | 5 J | 1 J | | | 1 J | | | | |
| Arsenic | 16 ^f | 16 ^f | 8.4 B | 4.5 B | 7.8 B | 11.2 | 15.8 | 11.6 | 7.5 | 14.9 | 8.0 |
| Barium | 400 ^f | 10,000 ^f | 79.5 | 113 | 108 | 91.7 | 157 | 131 | 72.2 | 130 | 92.2 |
| Beryllium | 590 | 2,700 | 0.795 | 0.622 | 0.795 | 0.798 B | 0.960 B | 0.932 B | 0.532 B | 0.648 B | 0.614 |
| Cadmium | 9.30 | 60 | 1.120 | 0.625 | 0.428 | 0.195 J | 0.796 | 0.163 J | | 0.426 | 0.399 |
| Calcium | | | 106,000 D08 | 159,000 D08 | 60,300 | 17,500 | 21,400 | 64,600 | 35,400 | 15,300 | 71,400 |
| Chromium | 400 | 800 | 11.8 | 7.00 | 15.2 | 12.8 | 16.8 | 12.8 | 11.6 | 15.8 | 12.5 B |
| Cobalt | | | 3.00 | 2.61 | 6.32 | 5.37 | 5.61 | 5.15 | 5.72 | 4.78 | 6.87 |
| Copper | 270 | 10,000 | 185.0 | 48.8 | 37.5 | 36.4 | 61.0 | 54.8 | 27.8 | 34.4 | 44.8 |
| Iron | | | 12,800 | 8,540 | 16,400 | 18,000 | 20,100 | 17,800 | 15,300 | 14,600 | 16,800 B3 |
| Lead | 1,000 | 3,900 | 99.8 | 102 | 122 | 104 | 195 | 114 | 69.3 | 141 | 81.5 |
| Magnesium | | | 15,800 B | 10,200 B | 10,100 B | 3,230 | 4,050 | 5,850 | 7,060 | 4,760 | 8,040 |
| Manganese | 10,000 ^d | 10,000 ^d | 484 B | 321 B | 581 B | 626 | 786 | 492 | 308 | 371 | 385 B |
| Nickel | 310 ^b | 10,000 ^c | 10.6 | 9.5 | 16.2 | 14.6 | 18.7 | 16 | 15.8 | 13.7 | 19.3 |
| Potassium | | | 815 | 847 | 1,660 | 1,040 | 1,400 | 1,240 | 1,420 | 1,130 | 1,320 |
| Silver | 1,500 | 6,800 | 1.090 | 2.070 | | 0.152 J | 0.286 J | 0.210 J | | 0.181 J | 1.080 |
| Sodium | | | 233 | 298 | 132 J | 187 J | 205 | 219 J | 117 J | 126 J | 182 |
| Thallium | | | | | | 2.2 J | 2.1 J | 2 J | 1.2 J | 1.4 J | |
| Vanadium | | | 9.310 | 9.070 | 19.7 | 21.8 | 24.3 | 18.9 | 18.6 | 19.6 | 15.8 |
| Zinc | 10,000 ^d | 10,000 ^d | 207 B | 143 B | 131 B | 150 B | 283 B | 132 B | 90.1 B | 206 B | 90.7 B |
| Mercury | 2.8 ^j | 5.7 ^j | 0.119 | 0.061 | 0.128 | 0.192 | 0.242 | 0.124 | 0.208 | 0.167 | 0.113 |

Notes:

Only those analytes detected at a minimum of one location are shown. Blank cells indicate non-detect.

B - Analyte detected in assocaited method blank

D08 - Dilution required due to high concentration of target analyte

J - Estimated value, analyte less than reporting limit but greater than method detection limit

-Bold value indicates exceedance of Industrial SCO.

-Shaded value indicates exceedance of Commercial SCO.

Restricted Use Footnotes

b - The SCOs for commercial use were capped at a maximum value of 500 ppm (500,000 ppb).

c - The SCOs for industrial use and the protection of groundwater were capped at a maximum value of 1000 ppm (1,000,000 ppb).

d - The SCOs for the metals were at a maximum value of 10,000 ppm.

f - For constituents where the calculated SCO was lower than the rural soil background concentration as determined by the Department of Health rural soil survey, the rural soil back ground concentration is used as the Track 2 SCO value for this site.

j - This SCO is the lower of the values for mercury (elemental) or mercury (inorganic salts).

MALCOLM PIRNIE

TABLE 7-3 Remedial Investigation Subsurface Soil - Organic Results 1132-1146 Seneca Street Site Buffalo, NY

| Sample ID Sample Depth (ft. BGS) Sample Date | Restricted Use Soil Cleanup Objectives - Commercial | Restricted Use Soil Cleanup Objectives - Industrial | TP-1 1.4-2.0 10/14/2009 | TP-2 1.5-2 10/14/2009 | TP-3 1-1.5 10/14/2009 | TP-4 1-1.5 10/14/2009 | TP-5 3.5-4.5 10/14/2009 | TP-DUPL #1 (TP-5) 10/14/2009 | TP-8 0.5-1.2 10/15/2009 | TP-18 0.5-1.0 10/16/2009 | B-2 0.5-1.0 10/19/2009 | B-3 0.6-0.9 10/19/2009 | B-5 0.5-2.0 10/19/2009 |
|--|--|--|-------------------------------|-----------------------------|-----------------------------|-----------------------------|-------------------------------|------------------------------------|-------------------------------|--------------------------------|------------------------------|------------------------------|------------------------------|
| Volatiles Organic Compou | ınds (µg/kg) | | | | | | | | | | | | |
| 1,2,4-Trichlorobenzene | | | | | | 250 D08 | | | | | | - | |
| 1,2-Dichlorobenzene | 500,000 ^b | 1,000,000 ^c | | | | 3.8 J | | | | | | - | |
| 1,3-Dichlorobenzene | 280,000 | 560,000 | | | | 5.9 D08,J | | | | | | - | |
| 1,4-Dichlorobenzene | 130,000 | 250,000 | | | | 3.7 J | | | | | | - | |
| 2-Butanone | 500,000 ^b | 1,000,000 ^c | 13 J | 11 J | 46 | | 120 J | 14 J | | | | - | |
| Acetone | 500,000 ^b | 1,000,000 ^c | 78 | 54 | 260 | 36 D08,J | 410 | 86 | | | 14 J | - | |
| Methylene Chloride | 500,000 ^b | 1,000,000 ^c | | 2.7 J | 2.9 J | 2.8 J | 24 J | 2.3 J | 6 J,B | 11 B | 11 B | - | 4.8 J,B |
| Semi-Volatiles Organic Co | ompounds (µg/kg) | | | | | | | | | | | | |
| 2-Methylnaphthalene | | | | | | | | | | | | | 100 J,B |
| Acenaphthene | 500,000 ^b | 1,000,000 ^c | | | | | | | | | | | 10 J |
| Benzo(a)anthracene | 5,600 | 11,000 | | | 790 D12,J | | | | | 220 D10,J | | | |
| Benzo(a)pyrene | 1,000 ^f | 1,100 | | | 630 D12,L1,J | | | | | 200 D10,J | | | |
| Benzo(b)fluoranthene | 5,600 | 11,000 | | | 1,100 D12,J | | | | | 330 D10,J | | | |
| Chrysene | 56,000 | 110,000 | | | 710 D12,J | | | | | 230 D10,J | | | |
| Fluoranthene | 500,000 ^b | 1,000,000 ^c | | 400 D10,J | 1,300 D12,J | | | | 210 D10,J | 330 D10,J | | | |
| Indeno(1,2,3-cd)pyrene | 5,600 | 11,000 | | | 380 D12,J | | | | | | | | |
| Naphthalene | 500,000 ^b | 1,000,000 ^c | | | | | | | | | | | 540 B |
| Phenanthrene | 500,000 ^b | 1,000,000 ^c | | | 700 D12,J | | | | | 250 D10,J | | | |
| Pyrene | 500,000 ^b | 1,000,000 ^c | | 280 D10,J | 1,100 D12,J | 140 D10,J | | | | 250 D10,J | | | |
| PCB (µg/kg) | | | | | | | | | | | | | |
| Aroclor 1248 | | | | | | | | | | | | 1,500 D08,J | |
| Aroclor 1254 | | | 12 QSU,J | | 2,100 D08 | 23,000 D08 | 31 QSU | 15 QSU,J | | | | | |
| Aroclor 1260 | | | 11 QSU,J | 180 QSU | 2,500 D08 | 5,100 D08 | 26 QSU | 13 QSU,J | | | 180 D08,J | 4,200 D08 | |
| Totoal PCBs | 1,000 | 25,000 | 23 | 180 | 4,600 | 28,100 | 57 | 28 | | | 180 | 5,700 | |

Notes:

Only those analytes detected at a minimum of one location are shown. Blank cells indicate non-detect.

B - Analyte detected in assocaited method blank

D08 - Dilution required due to high concentration of target analyte

D10 - Dilution required due to sample color

D12 - dilution required due to sample viscosity

J - Estimated value, analyte less than reporting limit but greater than method detection limit

L1 -

QSU - Sulfur clean-up performed on extract

T10 - Sample had an adjusted final volume during extraction due to extract matrix or viscosity

-Bold value indicates exceedance of Industrial SCO.

-Shaded value indicates exceedance of Commercial SCO.

Restricted Use Footnotes

b - The SCOs for commercial use were capped at a maximum value of 500 ppm (500,000 ppb).

c - The SCOs for industrial use and the protection of groundwater were capped at a maximum value of 1000 ppm (1,000,000 ppb).

f - For constituents where the calculated SCO was lower than the rural soil background concentration as determined by the Department of Health rural soil survey, the rural soil back ground concentration is used as the Track 2 SCO value for this site.

TABLE 7-4 Remedial Investigation Soil PCB Precharacterization Results 1132-1146 Seneca Street Site Buffalo, NY

| Sample ID | RUSCO - Commercial | RUSCO - Industrial | A-U | A-L | B-U | B-L | C-U | C-L | Dup-L (C-L) |
|--------------|-----------------------|-----------------------|---------------|--------------|-----------------|-----------------|---------------|--------------|--------------|
| PCB (µg/kg) | · · | | | | | | | | |
| Aroclor 1242 | | | | | | | 14,000 D08 | 3,500 D08 | 2,800 D08 |
| Aroclor 1248 | | | 1,900 D08, J | | 6,500 D08 | 380 D08, J | | | |
| Aroclor 1254 | | | 11,000 D08, B | 250 QSU, B | 16,000 D08, B | 2,500 D08, B | 34,000 D08,B | 14,000 D08,B | 11,000 D08,B |
| Aroclor 1260 | | | 27,000 D08 | 450 QSU | 54,000 D08 | 6,000 D08 | 72,000 D08 | 22,000 D08 | 16,000 D08 |
| Totoal PCBs | 1,000 | 25,000 | 39,900 | 700 | 76,500 | 8,880 | 120,000 | 39,500 | 29,800 |
| Sample ID | RUSCO - Commercial | RUSCO - Industrial | D-U | D-L | E-U | E-L | F-U | F-L | G-U |
| PCB (µg/kg) | | 1 | | 1 | | | 1 | | |
| Aroclor 1242 | | | 5,900 D08 | | | | 180,000 D08,J | 24,000 D08 | 2,200 D08 |
| Aroclor 1248 | | | | 1,000 | | 83 D08, | | | |
| Aroclor 1254 | | | 47,000 D08,B | 3,200 | 7,000 D08,B | 550 D08, QSU, | 780,000 D08,B | 77,000 D08,B | 17,000 D08,B |
| Aroclor 1260 | | | 53,000 D08 | 5,100 | 11,000 D08 | 1,100 D08, | 1,100,000 D08 | 100,000 D08 | 28,000 D08 |
| Totoal PCBs | 1,000 | 25,000 | 105,900 | 9,300 | 18,000 | 1,733 | 2,060,000 | 201,000 | 47,200 |
| Sample ID | RUSCO - Commercial | RUSCO - Industrial | G-L | H-U | H-L | I-U | I-L | J-U | J-L |
| PCB (µg/kg) | - | 1 | | 1 | | | 1 | | |
| Aroclor 1242 | | | | | | | | | |
| Aroclor 1248 | | | 8,600 D08 | 9,600 D08 | 370 D08 | | | | |
| Aroclor 1254 | | | 26,000 D08,B | 33,000 D08,B | 2,100 D08,B | 11,000 D08,QSU, | 6,000 D08,B | 7,000 D08,B | 4,000 D08,B |
| Aroclor 1260 | | | 16,000 D08 | 28,000 D08 | 2,400 D08 | 18,000 D08,QSU | 6,000 D08 | 11,000 D08 | 6,000 D08 |
| Totoal PCBs | 1,000 | 25,000 | 50,600 | 70,600 | 4,870 | 29,000 | 12,000 | 18,000 | 10,000 |
| Sample ID | RUSCO - Commercial | RUSCO - Industrial | К-U | K-L | L-U | Dup-U (L-U) | L-L | M-U | M-L |
| PCB (µg/kg) | | - | | 1 | | | 1 | | |
| Aroclor 1242 | | | | | | | | | |
| Aroclor 1248 | | | | | | | | | |
| Aroclor 1254 | | | 260,000 D08,B | 32,000 D08,B | 2,800,000 D08,B | 960,000 D08,B | 27,000 D08,B | 16,000 D08,B | 13,000 D08,B |
| Aroclor 1260 | | | 74,000 D08,B | 8,500 D08,B | 290,000 D08,B | 90,000 D08 | 4,400 D08,B | 2,500 D08,B | 2,400 D08,B |
| Totoal PCBs | 1,000 | 25,000 | 334,000 | 40,500 | 3,090,000 | 1,050,000 | 31,400 | 18,500 | 15,400 |

Notes:

RSUCO - Industrial + NYSDEC Restricted Use Soil Cleanup Objectives for Industrial Use

RSUCO - Commercial = NYSDEC Restricted Use Soil Cleanup Objectives for Commercial Use

Only those analytes detected at a minimum of one location are shown. Blank cells indicate non-detect.

B - Analyte detected in assocaited method blank

D08 - Dilution required due to high concentration of target analyte

J - Estimated value, analyte less than reporting limit but greater than method detection limit

QSU - Sulfur clean-up performed on extract

Bold value indicates exceedance of Industrial SCO.



Shaded value indicates exceedance of Commercial SCO.

Shaded value indicates exceedance of 50,000 ug/kg Hazardous Waste Cleanup Level.

TABLE 7-4 Remedial Investigation Soil PCB Precharacterization Results 1132-1146 Seneca Street Site Buffalo, NY

| Sample ID | RUSCO - Commercial | RUSCO - Industrial | N-U | N-L | O-L | 0-L | P-U | P-L | |
|--------------|-----------------------|-----------------------|--------------|---------------|--------------|--------------|--------------|-------------|---|
| PCB (µg/kg) | | | | | | | | | |
| Aroclor 1242 | | | | | 2,400 D08,B | 1,800 D08,B | 4,300 D08,B | 700 D08,B | 1 |
| Aroclor 1248 | | | | | | | | | 1 |
| Aroclor 1254 | | | 14,000 D08,B | 5,400 D08,B | 17,000 D08,B | 17,000 D08,B | 16,000 D08,B | 5,200 D08,B | 1 |
| Aroclor 1260 | | | 3,800 D08,B | 1,500 D08,B | 11,000 D08,B | 9,200 D08,B | 18,000 D08,B | 5,900 D08,B | 1 |
| Totoal PCBs | 1,000 | 25,000 | 17,800 | 6,900 | 30,400 | 28,000 | 38,300 | 11,800 | |
| Sample ID | RUSCO - Commercial | RUSCO - Industrial | D1-U | D1-L | H1-U | H1-L | K1-U | K1-L | |
| PCB (µg/kg) | | | | | | | | | |
| Aroclor 1242 | | | | | | | | | 1 |
| Aroclor 1248 | | | | | | | | | 1 |
| Aroclor 1254 | | | 1,780 | 29 | 550 | | 121 | | 1 |
| Aroclor 1260 | | | 1,790 | | 504 | | 121 | | 1 |
| Totoal PCBs | 1,000 | 25,000 | 3,570 | 29 | 1,054 | 0 | 242 | 0 | |
| Sample ID | RUSCO - Commercial | RUSCO - Industrial | L1-U | Dup2-U (L1-U) | L1-L | O1-U | 01-L | P1-U | P |
| PCB (µg/kg) | | | | | | | | | |
| Aroclor 1242 | | | | | | | | | |
| Aroclor 1248 | | | | | | | | | |
| Aroclor 1254 | | | | | | | | | |
| Aroclor 1260 | | | 148 | 67.4 | | 46.2 | | 46.3 | |
| Totoal PCBs | 1,000 | 25,000 | 148 | 67 | 0 | 46 | 0 | 46 | |
| Sample ID | RUSCO - Commercial | RUSCO - Industrial | Q-U | U-U | U-L | | | | |
| PCB (µg/kg) | | · | | | · | | | | |
| Aroclor 1242 | | | | | | Ţ | | | |

| Aroclor 1254 | | | | 2,630 |
|--------------|-------|--------|-----|-------|
| Aroclor 1260 | | | 186 | 2,670 |
| Totoal PCBs | 1,000 | 25,000 | 186 | 5,300 |
| | | | | |

Notes:

Aroclor 1248

RSUCO - Industrial + NYSDEC Restricted Use Soil Cleanup Objectives for Industrial Use

RSUCO - Commercial = NYSDEC Restricted Use Soil Cleanup Objectives for Commercial Use

Only those analytes detected at a minimum of one location are shown. Blank cells indicate non-detect.

B - Analyte detected in assocaited method blank

D08 - Dilution required due to high concentration of target analyte

J - Estimated value, analyte less than reporting limit but greater than method detection limit

QSU - Sulfur clean-up performed on extract

Bold value indicates exceedance of Industrial SCO.

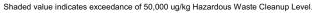


1,810

2,010

3,820

Shaded value indicates exceedance of Commercial SCO.



MALCOLM PIRNIE

TABLE 7-5 Remedial Investigation Subsurface Soil - Metal Results 1132-1146 Seneca Street Site Buffalo, NY

| Sample ID Sample Depth (ft. BGS) Sample Date | Restricted Use Soil Cleanup Objectives - Commercial | Restricted Use Soil Cleanup Objectives - Industrial | TP-1 1.4-2.0 10/14/2009 | TP-2 1.5-2 10/14/2009 | TP-3 1-1.5 10/14/2009 | TP-4 1-1.5 10/14/2009 | TP-5 3.5-4.5 10/14/2009 | TP-DUPL #1 (TP-5) 10/14/2009 | TP-8 0.5-1.2 10/15/2009 | TP-18 0.5-1.0 10/16/2009 | B-2 0.5-1.0 10/19/2009 | B-5 0.5-2.0 10/19/2009 |
|--|--|--|-------------------------------|-----------------------------|-----------------------------|-----------------------------|-------------------------------|------------------------------------|-------------------------------|--------------------------------|------------------------------|------------------------------|
| Metals (mg/kg) | | | | | | | ' | | | | | |
| Aluminum | | | 15,700 | 4,820 | 11,900 | 5,100 | 24,800 | 24,200 | 20,300 B | 7,410 B | 3,720 | 6,540 |
| Antimony | | | | 1 J | | 2 J | | | | | | |
| Arsenic | 16 ^f | 16 ^f | 13.5 B | 9.7 B | 8.2 B | 21.3 B | 12.6 B | 13.2 B | 9.0 | 13.6 | 10.7 | 2.3 J |
| Barium | 400 ^f | 10,000 ^f | 111 | 261 | 119 | 134 | 195 | 113 | 123 | 130 | 194 | 58.9 |
| Beryllium | 590 | 2,700 | 0.741 | 0.635 | 0.759 | 0.850 | 1.580 | 1.790 | 1.080 B | 0.665 B | 0.599 | 0.296 |
| Cadmium | 9.30 | 60 | 0.259 J | 0.593 | 0.555 | 1.210 | 0.510 | 0.489 | | | 0.134 J | 0.120 J |
| Calcium | | | 5,430 | 2,640 | 5,140 | 4,000 | 4,630 | 4,240 | 57,700 | 5,510 | 17,500 | 55,700 |
| Chromium | 400 | 800 | 16.2 | 8.28 | 12.2 | 7.29 | 26.8 | 28.1 | 18.6 | 10.6 | 4.94 B | 9.26 B |
| Cobalt | | | 8.73 | 4.59 | 8.94 | 18.3 | 28.4 | 30.6 | 3.23 | 7.86 | 3.35 | 4.30 |
| Copper | 270 | 10,000 | 34.6 | 35.9 | 20.4 | 44.4 | 14.6 | 9.6 | 14.7 | 47.5 | 27.8 | 10.9 |
| Iron | | | 25,400 | 15,800 | 29,900 | 24,300 | 75,200 | 101,000 D08 | 16,200 | 13,900 | 11,500 B3 | 10,400 B3 |
| Lead | 1,000 | 3,900 | 27 | 46.5 | 53 | 26.4 | 43.2 | 44.6 | 55.2 | 683 | 58.1 | 28.3 |
| Magnesium | | | 2,300 B | 404 B | 1,990 B | 1,040 B | 3,070 B | 2,900 B | 1,910 | 2,280 | 686 | 17,400 |
| Manganese | 10,000 ^d | 10,000 ^d | 230 B | 111 B | 1,710 B | 1,520 B | 1,730 B | 1,570 B | 2,510 | 235 | 78.7 B | 289 B |
| Nickel | 310 ^b | 10,000 ^c | 18.8 | 11.4 | 16.3 | 38.7 | 17.8 | 16.3 | 6.9 | 18.6 | 9.01 | 10.0 |
| Potassium | | | 947 | 464 | 768 | 761 | 1,150 | 1,030 | 2,300 | 1,230 | 321 | 1,220 |
| Selenium | 1,500 | 6,800 | 1.1 J | 2 J | 1 J | | | | | | 1.4 J | |
| Silver | 1,500 | 6,800 | | | 0.134 J | 0.221 J | 0.154 J | 0.139 J | 0.124 J | 0.172 J | | |
| Sodium | | | 899 | 100 J | 145 J | 118 J | 329 | 251 | 695 | 224 | 106 J | 126 J |
| Thallium | | | | 0.6 J | | | | | 2.1 J | 1 J | | |
| Vanadium | | | 26.8 | 23.9 | 23.1 | 14.3 | 66.4 | 82.2 | 33.1 | 20 | 13.1 | 13.3 |
| Zinc | 10,000 ^d | 10,000 ^d | 89.1 B | 153 B | 109 B | 176 B | 172 B | 175 B | 53.6 B | 100 B | 50.5 B | 48.6 B |
| Mercury | 2.8 ^j | 5.7 ^j | 0.146 | 0.0882 | 0.299 | 0.0867 | 0.100 | 0.0557 | 0.0947 | 0.486 | 0.0635 | 0.0691 |
| Notes: | | | | | | | | | | | | |

Notes:

Only those analytes detected at a minimum of one location are shown. Blank cells indicate non-detect.

B - Analyte detected in assocaited method blank

D08 - Dilution required due to high concentration of target analyte

D10 - Dilution required due to sample color

D12 - dilution required due to sample viscosity

J - Estimated value, analyte less than reporting limit but greater than method detection limit

QSU - Sulfur clean-up performed on extract

T10 - Sample had an adjusted final volume during extraction due to extract matrix or viscosity

-Bold value indicates exceedance of Industrial SCO.

-Shaded value indicates exceedance of Commercial SCO.

Restricted Use Footnotes

b - The SCOs for commercial use were capped at a maximum value of 500 ppm (500,000 ppb).

c - The SCOs for industrial use and the protection of groundwater were capped at a maximum value of 1000 ppm (1,000,000 ppb).

d - The SCOs for the metals were at a maximum value of 10,000 ppm.

f - For constituents where the calculated SCO was lower than the rural soil background concentration as determined by the Department of Health rural soil survey, the rural soil back ground concentration is used as the Track 2 SCO value for this site.

j - This SCO is the lower of the values for mercury (elemental) or mercury (inorganic salts).

MALCO

TABLE 7-6 **Remedial Investigation Groundwater Sampling Results** 1132-1146 Seneca Street Site **Buffalo**, NY

| Sample ID Sample Date | NYSDEC Class GA Groundwater Quality Standards | B-1 10/22/20 | 009 | B-DUP#1 (B-1) 10/22/2009 | | B-2 10/22/2009 | B-4 11/3/2009 and 11/4/2009 ¹ | B-5 10/22/2009 |
|------------------------------------|---|-----------------|------|--------------------------------|-----|-------------------|--|-------------------|
| Volatiles Organic Compounds (µg/l) | | | | | | | | |
| Acetone | | | | | | | | 10 |
| Benzene | 1 | | | | | | | 0.59 J |
| Cyclohexane | | | | | | | | 0.61 J |
| Methylcyclohexane | | | | | | | | 0.9 J |
| Methylene Chloride | 5 | | | | | | 1.2 J | |
| Toluene | 5 | | | | | | | 3.6 |
| Xylenes, total | 5 | | | | | | | 2.2 |
| Semi-Volatiles Organic Compounds | | | | | | I | | 2.2 |
| | (µg/i) | | _ | | | | | 0.58 H4,J |
| 2-Methylnaphthalene | | | | | | | | |
| Acetophenone | | | | 0.0 | | | | 2.4 H4,J |
| Anthracene | | | | 0.3 | J | | | |
| Benzaldehyde | | | | | | | | 3.5 J |
| Benzo(a)anthracene | | 0.44 | H4,J | | | | | |
| Benzo(a)pyrene | ND | | | 0.46 | J | | | |
| Benzo(b)fluoranthene | | 0.27 | H4,J | 0.49 | J | | | |
| Benzo(ghi)perylene | | | | 0.34 | J | | | |
| Benzo(k)fluoranthene | | 0.2 | H4,J | 0.32 | J | | | |
| Bis(2-ethylhexyl) phthalate | 5 | | | | | | 4.9 | |
| Chrysene | | 0.38 | H4,J | | | | | |
| Diethyl phthalate | | 0.42 | H4,J | 0.33 | J,B | | | 1.2 L,J |
| Di-n-butyl phthalate | 50 | 0.44 | J | 0.55 | J | 0.36 J | 1.7 J | 0.72 J |
| Fluoranthene | | | H4,J | 1 | | | | |
| Indeno(1,2,3-cd)pyrene | | | ,= | 0.29 | | | | |
| Phenanthrene | | | | 0.71 | | | | 0.75 J |
| Phenol | 1 | | | 7.4 | - | | | 0.92 H4,J |
| PCBs (µg/l) | · · · | | | 7.4 | | | | 0.52 114,0 |
| Aroclor 1242 | | | | | | | | |
| Aroclor 1248 | | | | | | | | |
| Aroclor 1254 | | | | | | | | |
| Aroclor 1260 Totoal PCBs | 0.09 | | | | | | | |
| Metals (mg/l) | 0.09 | | | | | | | |
| | 1 | 0.775 | | 0.040 | | 0.45 | 4.00 | 4.40 |
| Aluminum | 0.005 | 0.775 | | 0.616 | | 2.45 | 4.26 | 1.18 |
| Arsenic | 0.025 | | | | | 0.0136 | 0.0081 J | |
| Barium | 1 | 0.149 | _ | 0.152 | | 0.12 | 0.0976 | 0.0673 |
| Beryllium | | | | 0.0003 | J | 0.0004 J | | |
| Calcium | | 176 | | 180 | | 302 | 193 | 145 |
| Chromium | 0.05 | 0.0012 | J | 0.0011 | J | 0.0023 J | 0.0074 | 0.0023 J |
| Cobalt | | | | | | 0.0043 | 0.0032 J | 0.0044 |
| Copper | 0.2 | 0.0016 | J | | | 0.0032 J | 0.0133 | 0.0022 J |
| Iron | 0.3 | 6.55 | | 6.6 | | 11.2 | 5.02 | 1.1 |
| Lead | 0.025 | | | | | | 0.0074 | |
| Magnesium | | 41.8 | | 42.2 | | 54.2 | 32.2 | 31 |
| Manganese | 0.3 | 1.79 | | 1.82 | | 2.27 | 1.97 | 0.285 |
| Nickel | 0.1 | 0.0021 | J | 0.0026 | | 0.0089 J | 0.0079 J | 0.0057 J |
| Potassium | | 6.78 | | 7.04 | | 9.54 | 13.4 | 17.5 |
| Sodium | 20 | 147 | | 150 | | 51.7 | 40.3 | 15.4 |
| Vanadium | 20 | 0.0021 | | 0.0019 | | 0.0055 | 0.0087 | 0.0027 J |
| v anadium | + | 0.0021 | | 0.0036 | | 0.0055 | 0.0187 | 0.0027 J |

Notes: ¹ Due to low recharge rates at B-4, the sample was collected over the course of two days. Two samples were submitted for SVOC analysis. The Only those analytes detected at a minimum of one location are shown. Blank cells indicate non-detect.

B - Analyte detected in assocaited method blank

H4 - Sample was extraced past holding time, but analyzed within analysis holding time.

J - Estimated value, analyte less than reporting limit but greater than method detection limit

-Shaded value indicates exceedance of NYSDEC Class GA Groundwater Quality Standards (6 NYCRR Part 703).



TABLE 7-7 Remedial Investigation Soil Vapor Results 1132-1146 Seneca Street Site Buffalo, NY

| Sample ID Sample Date | SV-1 10/21/2009 | SV-2 10/21/2009 | SV-3 10/21/2009 | SV-4 10/21/2009 | DUP (at SV-4) 10/21/2009 |
|--|--------------------|--------------------|--------------------|--------------------|-----------------------------|
| Volatiles Organic Compounds (µg/m ³) | | | | | |
| 1,1,1-Trichloroethane | 20 | 82 | 6.0 | | |
| 1,2,4-Trimethylbenzene | 2.0 | 4.6 | | 1.2 | 1.4 |
| 1,3,5-Trimethylbenzene | 0.98 | | | | |
| 1,3-Butadiene | | | 1.8 | | |
| Acetone | 29 | 260 | 55 | 76 | 76 |
| Benzene | 1.3 | 3.5 | 4.2 | 1.8 | 2.3 |
| Carbon Disulfide | 2.3 | 8.1 | 14 | | |
| Chloromethane | | | | 1.3 | 1.3 |
| Cyclohexane | 10 | 10 | 7.6 | 1.5 | 3.8 |
| Dichlorodifluoromethane | | | | 2.7 | 2.7 |
| Ethylbenzene | 23 | | 1.7 | 4.8 | 4.1 |
| Methyl Ethyl Ketone | 2.6 | 9.4 | 6.2 | 2.2 | 2.4 |
| Methylene Chloride | | | | 2.0 | |
| n-Heptane | 3.6 | 41 | 15 | 2.3 | 5.7 |
| n-Hexane | 56 | 74 | 27 | 6.3 | 11 |
| Styrene | | | | 6.0 | 7.7 |
| Toluene | 4.5 | 11 | 3.1 | 4.1 | 5.3 |
| Trichlorofluoromethane | 3.6 | | 2.4 | 2.4 | 2.6 |
| Xylene (m,p) | 120 | 10 | 8.3 | 26 | 22 |
| Xylene (o) | 41 | 4.0 | 3.2 | 11 | 9.6 |
| Xylene (total) | 160 | 13 | 11 | 36 | 30 |

Notes:

Only those analytes detected at a minimum of one location are shown. Blank cells indicate non-detect.

Samples collected from four sub slab sampling points and analyzed for VOCs by the analytical Laboratory using USEPA Compendium Method TO-15.

Analytical parameters and comparison standards/criteria for each media samples are summarized as follows:

- Surface and subsurface soil/fill samples were analyzed for VOCs, SVOCs, PCBs, TAL metals and cyanide. Analytical results have been compared to the NYS Recommended Soil Cleanup Objectives (Restricted Commercial and Restricted Industrial) (NYSDEC, 2006).
- Groundwater samples were analyzed for VOCs, SVOCs, PCBs, TAL metals and cyanide and have been compared to NYSDEC Class GA groundwater standards and guidance values, (6NYCRR Part 360) (NYSDEC, 1998).
- Soil vapor samples were analyzed for VOCs and analytical results have been compared to NYSDOH Air Guideline Values (NYSDOH, 2006 and Litwin, 2007).

7.2. Surface Soil/Fill Sample Results

Chemical analyses of nine surface soil samples collected at the Site during the 2009 RI identified PCBs at concentrations that exceed NYSDEC Restricted Commercial and Residential Industrial Soil Cleanup Objectives (SCOs). The RI samples were collected at select soil boring and test pit locations throughout the Site.

Analytical results for the surface soil samples are summarized in Tables 7-1 and 7-2 and SCO exceedances illustrated on Figure 7-1.

VOCs

VOCs were not detected in surface soil samples at concentrations in excess of NYSDEC SCOs. Low concentrations of methylene chloride and 1,2,4-trichlorobenzene analytes were detected at three and one location respectively. Methylene chloride is a common lab contaminant and its detection at very low concentrations is believed to represent a laboratory contaminant and not Site related, See Table 7-1.

SVOCs

Several SVOCs were detected in all surface soil samples collected during the RI. Examination of Table 7-1 identified just three SVOCs, all polycyclic aromatic hydrocarbons (PAHs) including; benzo(a)anthracene, benzo(a)pyrene, and benzo(b)flouranthene at concentrations in excess of NYSDEC SCO for restricted commercial use. Benzo(a)pyrene, at three sample locations, was detected above the restricted industrial SCO of 1,100 ug/kg, See Table 7-1. Additional characterization of the elevated benzo(a)pyrene was performed on the 1146 Seneca Street property to determine necessary remedial measures. Of the 38 additional samples collected for BAP, 18 contained BAP at a concentration greater than the industrial SCO Table 7-1A provides a summary of analytical results of the pre-characterization surface soil sampling for BAP.





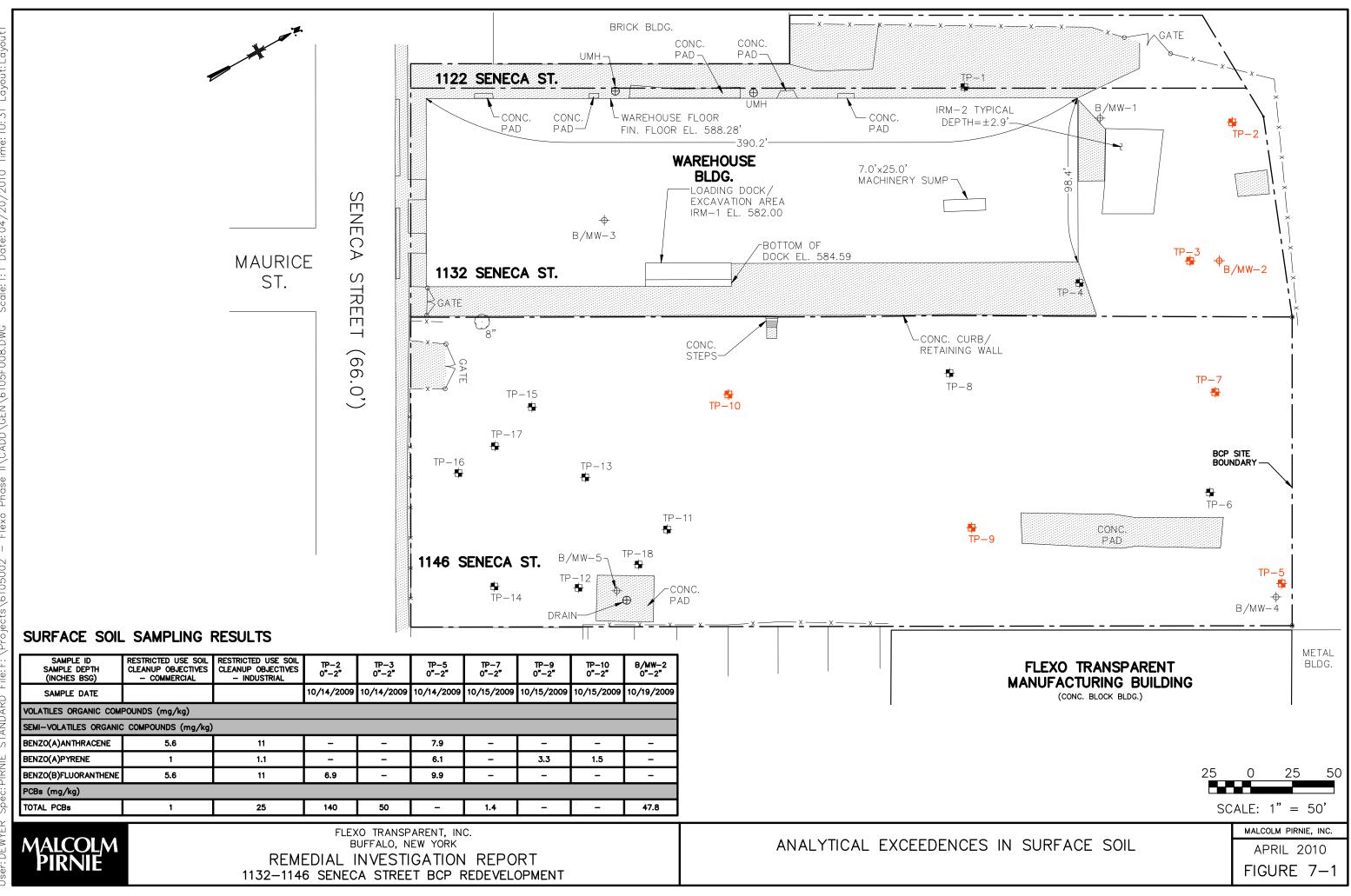




TABLE 7-1A Remedial Investigation Subsurface Soil - Benzo (a) Pyrene Results 1132-1146 Seneca Street Site Buffalo, NY

| Sample ID | Sample Depth (inches BGS) | Sample Collection Date | Benzo (a) pyrene (mg/kg) |
|--|------------------------------|------------------------------|-----------------------------|
| Restricted Use Soil Cleanup Objective - Commercial | | | 1.00 ^f |
| Restricted Use Soil Cleanup Objective - Industrial | | | 1.10 |
| SS-1 | 0-2 | 7/1/2010 | |
| \$\$-2 | 0-2 | 7/1/2010 | 0.23 J |
| SS-3 | 0-2 | 7/1/2010 | 0.48 |
| | 0-2 | | |
| SS-3 (DUP-1) | | 7/1/2010 | 0.52 |
| SS-4 | 0-2 | 7/1/2010 | 1.32 |
| SS-5 | 0-2 | 7/1/2010 | 1.09 |
| SS-6 | 0-2 | 7/1/2010 | 1.00 |
| SS-7 | 0-2 | 7/1/2010 | 1.39 |
| SS-8 | 0-2 | 7/1/2010 | 0.84 |
| SS-9 | 0-2 | 7/1/2010 | 0.35 J |
| SS-10 | 0-2 | 7/1/2010 | 0.62 |
| SS-11 | 0-2 | 7/1/2010 | 0.69 |
| SS-12 | 0-2 | 7/1/2010 | |
| SS-13 | 0-2 | 7/1/2010 | 0.76 |
| SS-14 | 0-2 | 7/1/2010 | 3.22 |
| SS-15 | 0-2 | 7/1/2010 | 2.35 |
| SS-16 | 0-2 | 7/1/2010 | 1.45 |
| SS-17 | 0-2 | 7/1/2010 | 2.20 |
| SS-18 | 0-2 | 7/1/2010 | 8.93 |
| SS-19 | 0-2 | 7/1/2010 | 0.85 |
| SS-20 | 0-2 | 7/1/2010 | 1.45 |
| SS-21 | 0-2 | 7/1/2010 | 0.57 J |
| SS-22 | 0-2 | 7/1/2010 | 0.38 |
| SS-23 | 0-2 | 7/1/2010 | 0.66 |
| SS-24 | 0-2 | 7/1/2010 | 2.54 |
| \$\$-25 | 0-2 | 7/1/2010 | 0.66 |
| SS-25 (DUP-2) | 0-2 | 7/1/2010 | 1.09 2.86 |
| SS-26 SS-27 | 0-2 | 7/1/2010 | 0.73 |
| SS-27 SS-28 | 0-2 | 7/1/2010 7/1/2010 | 1.95 |
| SS-20 SS-29 | 0-2 | 7/1/2010 | 21.70 |
| SS-29 SS-30 | 0-2 | 7/1/2010 | 21.70 |
| SS-31 | 0-2 | 7/1/2010 | 1.92 |
| SS-32 | 0-2 | 7/1/2010 | 0.87 |
| SS-33 | 0-2 | 7/1/2010 | 1.38 |
| SS-34 | 0-2 | 7/1/2010 | 1.08 |
| SS-35 | 0-2 | 7/1/2010 | 1.35 |
| SS-36 | 0-2 | 7/1/2010 | 2.02 |
| SS-37 | 0-2 | 7/1/2010 | 1.31 |
| SS-38 | 0-2 | 7/1/2010 | 3.26 |

Notes:

Blank cells indicate non-detect.

J - Estimated value, analyte less than reporting limit but greater than method detection limit

-Shaded value indicates exceedance of Commercial SCO.

-Bold value indicates exceedance of Industrial SCO.

Restricted Use Footnotes

b - The SCOs for commercial use were capped at a maximum value of 500 ppm (500,000 ppb).

c - The SCOs for industrial use and the protection of groundwater were capped at a maximum value of 1000 $\rm ppm$ (1,000,000 $\rm ppb).$

f - For constituents where the calculated SCO was lower than the rural soil background concentration as determined by the Department of Health rural soil survey, the rural soil back ground concentration is used as the Track 2 SCO value for this site.

PCBs

PCBs were detected in all surface soil samples collected as part of the RI. All surface soil samples collected from the 1146 Seneca Street property contained PCBs at concentrations below the restricted commercial SCO of 1 PPM.

All surface soil/fill samples collected from the 1132 Seneca Street property contained PCBs at concentrations above the restricted commercial SCO of 1 PPM and three of four RI samples exceed the restricted industrial SCO of 25 PPM, See Figure 7-1 and Table 7-1.

Metals

All surface soil samples contained several metals, all at concentrations below restricted commercial and industrial SCOs, See Table 7-2.

7.3. Subsurface Soil Results

Subsurface soil/fill samples, (samples collected below the 2" depth), were collected at 10 test pit or soil boring locations throughout the Site during the RI investigation, see Figures 7-2, and 7-3 and Tables 7-3, 7-4, and 7-5.

Each sample was analyzed for VOCs, SVOCs, PCBs, metals, and cyanide. Based on the analytical results of these 10 samples which revealed unexpectedly high PCB concentrations at some locations on the 1132 Seneca Street property, additional sampling was performed to delineate the extent of the PCB impacted soil fill.

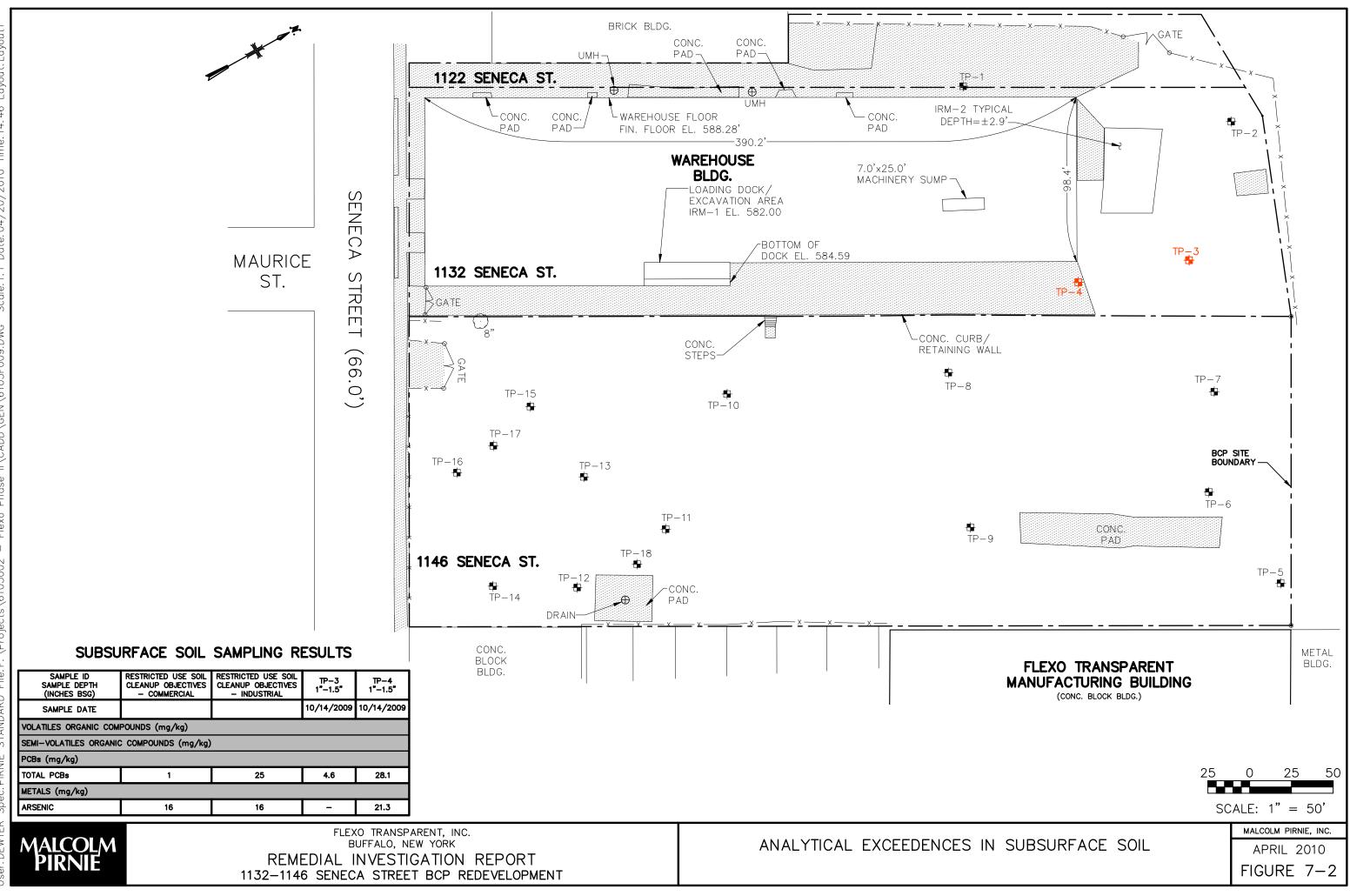
VOCs

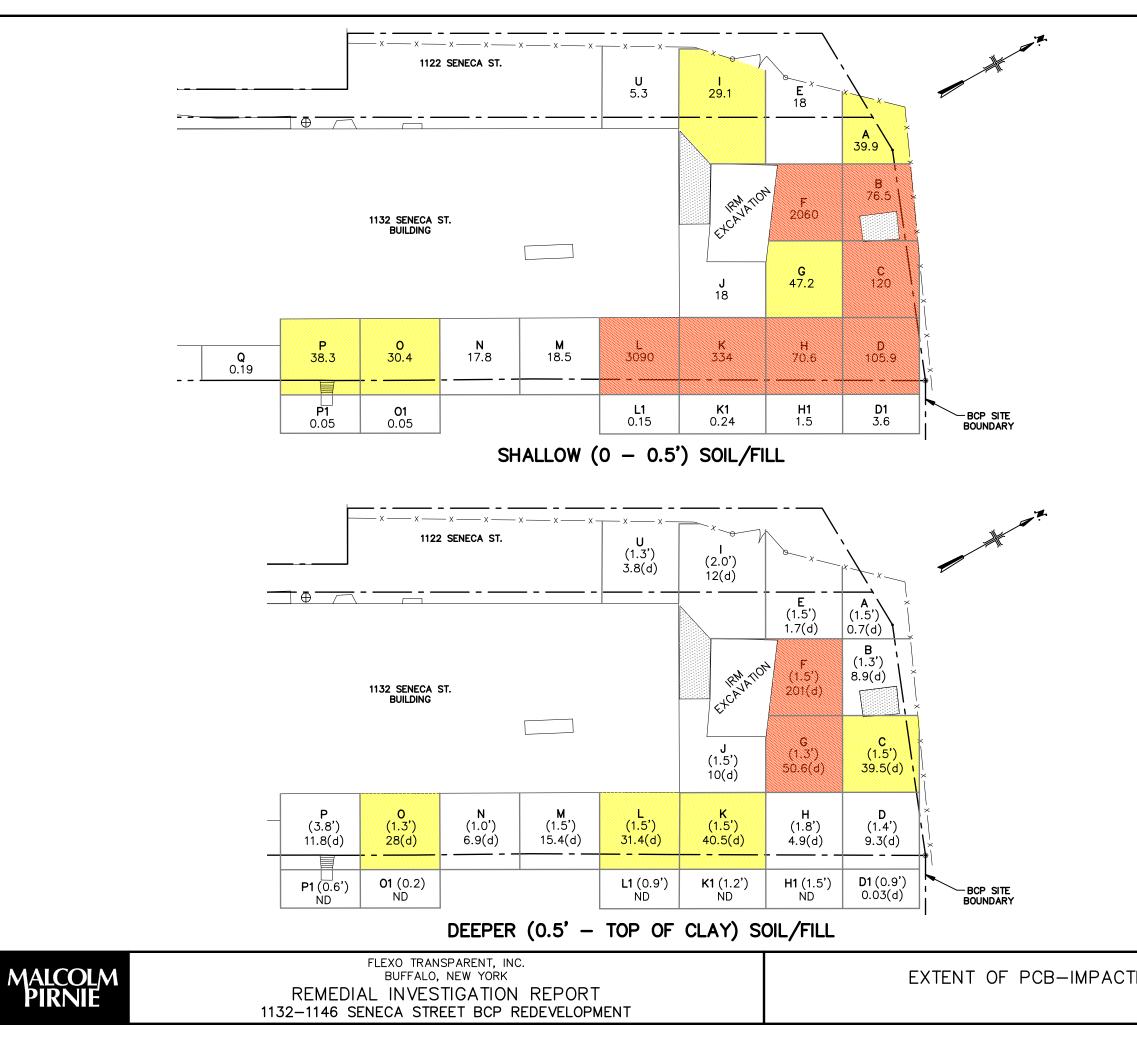
None of the 10 subsurface soil samples collected for VOC analysis contained VOCs at concentrations above restricted commercial or industrial SCOs. Nearly all of the subsurface soils collected contained low concentrations of 2-butanone, acetone, and methylene chloride. These compounds, when found at such low levels, are often attributable to laboratory sample container and/or equipment cleaning operations. The only other VOCs detected in subsurface soil samples were four chlorobenzenes that were detected at low concentrations at sample location TP-4. Sample TP-4 was collected near the northeast corner of the former manufacturing building on the 1132 Seneca street parcel.

SVOCs









IMAGES: None Ċ

| (1.5') | THICKNESS OF FILL BELOW AND BELOW CONCRETE IF F | |
|-----------|--|--|
| | 25 SC | 0 25 50 CALE: 1" = 50' |
| ED SOIL/F | TILL | MALCOLM PIRNIE, INC. APRIL 2010 FIGURE 7—3 |
| | | |

LEGEND

PROPERTY LINE EXISTING FENCE CELL ID ADJACENT CELL ID

TOTAL PCB's > 25 PPM (INDUSTRIAL SOIL CLEANUP OBJECTIVE)

TOTAL PCB's > 50 PPM (HAZARDOUS WASTE - CLEANUP LEVEL)

P1

Α

TOTAL PCB CONCENTRATION IN THE UPPER 6" OF FILL (UNITS OF PPM) 39.9

TOTAL PCB CONCENTRATION IN FILL

0.7(d) BELOW UPPER 6" OF FILL (UNITS OF PPM) Low concentrations of one or more SVOCs were detected in six of the 10 subsurface soil samples analyzed for SVOCs, none at concentrations above restricted commercial or industrial SCOs.

PCBs

Elevated concentrations of PCBs, were detected in subsurface soil/fill initially at two locations (Test pits TP-3 and TP-4) on the 1132 Seneca Street property. These locations contained concentrations of 4.6 PPM and 28.1 PPM respectively. Most of the eight samples collected on the 1146 Seneca Street property did contain PCBs but at concentrations less than the restricted residential SCO of 1 PPM.

With the highest allowable SCO for PCBs being the restricted industrial SCO of 25 PPM, and the presence of PCBs above that level confirmed on the 1132 Seneca Street property, a two-phased focused, pre-characterization sampling program was implemented to characterize the magnitude and extent of PCB impacted soil fill. As described in Section 5.4.1.2, composite samples were collected from two depths within the soil/fill layer. Upper (U) samples were collected from the top six inches of soil/fill and the lower (L) samples collected from six inches to the base of the soil/fill unit, at the interface with the native silty clay. All pre-characterization samples were analyzed for PCBs only.

Table 7-4 provides the PCB analytical results of the pre-characterization sampling program, and Figure 7-3 provides a color graphic presentation of these same data.

As illustrated on Figure 7-3, most of the area to the north and some areas east of the former manufacturing building on the 1132 Seneca Street property contain PCBs in the upper six inches of soil/fill at concentrations above the restricted industrial SCO of 25 PPM and some of these areas above 50 PPM, thus considered hazardous waste.

As also depicted on Figure 7-3, approximately half of the area containing PCBs above the SCO in the upper six inches also contains such elevated PCB concentrations in the deeper soil/fill, between the six inch depth and the base of soil/fill. This deeper interval averages approximately 1.5 feet thick.

The extent of PCB-impacted soil/fill requiring remedial action was determined to be limited to the 1132 (and 1122) Seneca Street properties, and limited to the soil/fill material above the native silty clay.

Metal

All surface soil samples contained several metals at concentrations below restricted commercial and industrial SCOs. Just one sample (TP-4), located on the 1146 Seneca Street property, contained one metal (arsenic) at a concentration of 21.3 mg/kg, slightly





above the restricted commercial and industrial SCO of 16 mg/kg, See Figure 7-2 and Table 7-5.

7.4. Groundwater Results

VOCs

With the exception of a trace concentration of methylene chloride in monitoring well B/MW-4 (sample B-4), only one groundwater sample contained detectable VOCs. The groundwater sample collected from well B/MW-5, located along the eastern boundary of the Site within what is believed to be the foundation of a two-bay former auto repair garage, contained low concentrations of six VOCs. Most of the VOC compounds detected in this sample are BTEX compounds that are commonly found associated with petroleum filling stations and auto servicing facilities where gasoline and lubricating oils are present. None of the VOCs detected were present at concentrations above the Class GA groundwater standards, see Table 7-6 and Figure 7-4.

SVOCs

Each of the four groundwater samples collected contained one or more SVOCs, most of which were in the PAH sub-group of SVOCs. Just two of these compounds were present at concentrations above the Class GA groundwater standards. Benzo(a)pyrene and phenol in the duplicate sample collected from well B/MW-1 slightly exceeded their respective standards. This well is located near the northwest corner of the former manufacturing building on the 1132 Seneca Street property.

PCBs

PCBs were not present above analytical detection limits in any of the groundwater samples collected.

Metals

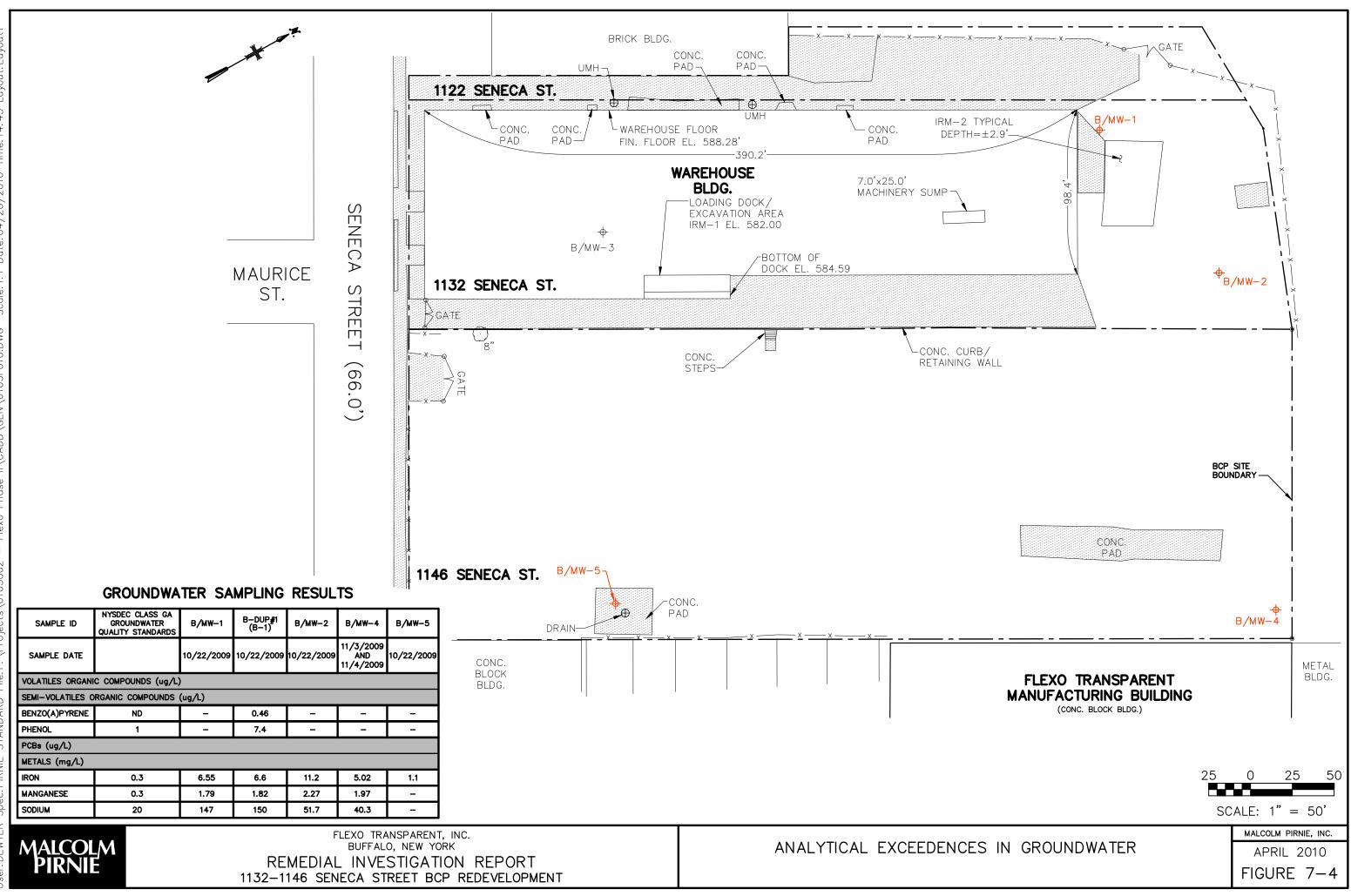
Several metals were present in all groundwater samples collected. Iron, manganese, and sodium concentrations were present at concentrations above the Class GA groundwater standards in most wells. These analytes are locally naturally occurring at such levels and iron and sodium are common nutrients necessary for human health.

7.5. Sub-Slab Soil Vapor Results

The concentrations of VOCs measured in soil vapor samples were compared to NYSDOH air guidance values for tetrachloroethene (PCE); trichloroethene (TCE); 1,1,1-trichloroethane (1,1,1-TCA); and cis-1,2-dichloroethylene (cis-1,2-DCE); as outlined in Matrices 1 and 2 in the draft guidance (NYSDOH, 2006 and Litwin, 2007). Since no







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indoor air samples were collected, the evaluation of VOCs in the soil vapor to NYSDOH guidelines was limited to only one axis of the NYSDOH Matrices. Using only one axis to the air matrices results in an evaluation based strictly on the potential recommended action. The recommended actions are divided into the need to monitor / mitigate, or mitigate. The monitor/mitigate action is recommended for sub-slab soil vapor concentrations that are greater than 50 mcg/m³ but less than 250 mcg/m³, for compounds included in decision matrix 1 (TCE); and greater than 100 mcg/m³ but less than 1000 mcg/m³ for those compounds in decision matrix 2 (PCE, 1,1,1-TCA, cis-1,2-DCE). Compounds in Matrix 1 with concentrations greater than 250 mcg/m³ have a recommended action of mitigation.

All VOC concentrations detected in sub-slab soil vapor collected at the Site were less than the NYSDOH air guideline value for mitigation or monitoring (NYSDOH, 2006), See Table 7-7.

Vapor Intrusion Pathway Assessment

The NYSDEC and NYSDOH do not currently provide specific guidance values for allowable concentrations of most VOCs in soil vapor or indoor air. The NYSDOH guidance considers concentrations of VOCs in both subsurface soil vapor and indoor air in order to identify requirements for further assessment of exposure risks and/or exposure pathways. Because VOCs were detected in the sub-slab soil vapor, even at trace levels, the human health assessment in Section 8 includes a soil vapor intrusion pathway as a conservative practice.





This section presents a qualitative evaluation of the potential for exposure and adverse human health effects associated with chemicals detected in sampled environmental media at the Brownfield Cleanup Program (BCP) Site. The human health evaluation (HHE) supplements the Remedial Investigation (RI) that was performed from October to December 2009 to characterize soil/fill, groundwater, and sub-slab soil vapor at the Site and to support the Site's future re-use. For the purposes of this HHE, it was assumed the volunteer will redevelop the Site as an expansion to their current business. The Site will have light industrial, office, and related parking uses.

8.1. Overview

Although qualitative, the HHE follows the four-step process typically used to assess potential human health risks:

<u>Data evaluation</u>: relevant analytical data from the RI are compiled and evaluated to determine their usability and to select chemicals of potential concern (COPC) representative of Site conditions. Additional soil/fill data from Phase II Site Assessments (SA) conducted at 1132 and 1146 Seneca Street in March 2008 were included in data summaries presented in this HHE.

<u>Exposure Assessment</u>: actual and/or potential chemical release mechanisms and migration pathways are evaluated and potentially exposed human populations, possible exposure pathways, and potential exposure routes are identified.

<u>Toxicity Assessment</u>: qualitative toxicity information is presented for each COPC identified for the Site.

<u>Risk Characterization</u>: the potential for adverse human health effects, in terms of both non-carcinogenic hazard and carcinogenic risk, is evaluated, currently and for the future, in the absence of further Site remediation. The uncertainties in this qualitative evaluation are also briefly discussed.

8.2. Site Description

The Site is composed of three adjoining properties located at 1122, 1132 and 1146 Seneca Street, Buffalo, Erie County, New York (Figure 1-2). The Site is located in a mixed commercial/light industrial and residential area. The Site is bounded by vacant property to the north, by Seneca Street to the south, by the City of Buffalo Engineering Garage to the west, and by mixed-use properties (i.e., commercial, residential, and light





industrial buildings along Wasson Street) to the east. The volunteer, Flexo-Transparent, Inc., is located adjacent and northeast of the 1146 Seneca Street property at 28 Wasson Street. Residential properties are also south and east of the site, on the opposite sides of Seneca Street and Wasson Street, respectively.

The Site consists of a former manufacturing building on the 1132 Seneca Street property and vacant land immediately to the west (1122 Seneca Street) and to the east (1146 Seneca Street). The former manufacturing building once housed office, warehouse, and manufacturing spaces. Historic operations at 1132 Seneca Street include lumber and railroad yards, manufacture of electrical transformers and machines (Westinghouse and Eastern Electric), and most recently, the manufacture of fiberglass railroad transfer platforms (Fiberight). The building occupies the majority of the 1132 Seneca Street property area. However, paved access roads lead from Seneca Street along the eastern and western sides of the building to an unpaved dirt/gravel area on the northern side of the building. The northern area is vacant and was covered with crushed stone and grass.

The vacant land at 1146 Seneca Street is approximately 2 acres and is covered with mowed patchy grass and two concrete pads. Historic operations on the 1146 property include lumber and railroad yards, clay products manufacturing, and a two-bay auto service garage. A portion of the property may also have been used by Westinghouse and Eastern Electric for the manufacture of transformers and machines.

The Site is surrounded by a chain-link fence on the southern, eastern, and western sides, and there are locked access gates along the southern boundary with Seneca Street. A chain-link fence is present along the northern side of 1132 Seneca Street. The northern side of 1146 Seneca Street is not fenced but is difficult to access because of overgrown vegetation.

There are no surface water bodies or wetlands on the Site. Site topography and that of the surrounding area are generally flat with a perceptible gentle westerly slope towards Lake Erie. In the broad scope of localized surface water discharge, the westward-flowing Buffalo River is located approximately 0.5-mile south of the Site and discharges to Lake Erie approximately three miles west of the Site.

Soils on the Site are classified as Urban Land, containing undifferentiated and disturbed soil/fill. Site investigations have revealed soil/fill is generally black-gray, fine to coarse grain sand with silt and trace clay admixed with construction and demolition debris composed of wood, concrete, brick and gravel. Fill thicknesses in test pits excavated during the RI ranged between 0.5 and 3.7 feet across the Site. Native glacial deposits of silt/sand and clay are present beneath the soil/fill. The native clay layer restricts the potential downward migration of groundwater and chemicals in the soil/fill layer to the underlying soils and bedrock.





Overburden groundwater, when present, is perched on the native silt/clay layer and is discontinuous across the Site. The depth to shallow groundwater has been measured in temporary monitoring wells on the Site as 0.1 to 4.1 feet below ground surface (bgs). Based on local topography and the location of the nearest major surface water body (i.e., the Buffalo River), deep bedrock groundwater is expected to flow south/southwest. Groundwater is not a source of potable water to the Site; potable water is supplied by the City of Buffalo Water Authority.

Flexo plans to use the former manufacturing building on the 1132 Seneca Street Parcel as a warehouse for storage and shipping of their products that are manufactured in the plant located nearby at 28 Wasson Street. Also, most of the 1146 Seneca Street parcel will be paved and used for parking and in support of a loading dock planned on the east side of the warehouse building. Improvements to the property will include paved walkways, new lawn and landscaping. Figure 8-2 provides a color figure depicting the location of these planned Site features.

8.3. Data Evaluation

The data evaluation focuses on the compilation of analytical data to assess the potential for human exposure and to select COPCs. This process identifies the detected chemicals that, if exposed to, may pose human health risks.

Environmental Media of Concern

The environmental media of concern at the Site are soil/fill, groundwater, and soil gas. Data are available from soil/fill, groundwater, and sub-slab soil vapor samples collected during the RI from October to December 2009. Additional soil/fill samples are available from Phase II SAs conducted at 1132 and 1146 Seneca Street in March 2008. The RI data were third-party validated. The Phase II SA data were not validated but the samples analyzed and reported with full Category B data deliverables per DER-10 and deemed acceptable for the purposes of this HHE.

Selection of COPC

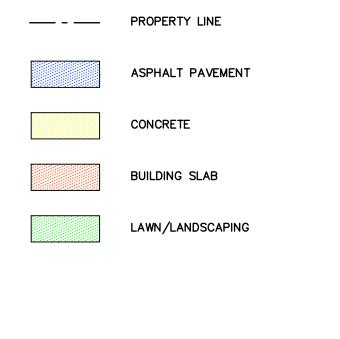
COPCs were selected in soil/fill and groundwater by comparing the maximum concentration of each detected chemical to applicable screening criteria. Chemicals with maximum detected concentrations greater than the screening criteria were selected as COPCs. Chemicals without a corresponding screening criterion were also selected as COPCs. However, where the maximum concentration of a metal detected in soil/fill was











MALCOLM PIRNIE, INC.

8-2

within the range of rural soil background concentrations¹, the metal was eliminated as a COPC in soil/fill, regardless of the comparison to screening criteria. In addition, inorganic chemicals regarded as essential nutrients (i.e., calcium, iron, magnesium, potassium, and sodium) were categorically eliminated as COPCs.

Because the New York State Department of Health (NYSDOH) does not advocate the use of a risk-based, screening-level approach for evaluating soil gas data, all chemicals detected in sub-slab soil vapor were identified as COPCs. Nonetheless, for discussion purposes only, the maximum concentration of each volatile chemical detected in sub-slab soil vapor was compared to human health risk-based Regional Screening Levels (RSLs) for industrial air derived by the U.S. Environmental Protection Agency (USEPA) (USEPA, 2010).

The following sub-sections describe the soil/fill, groundwater, and sub-slab soil vapor samples and identify the COPCs in each data set. While the entire data sets from RI samples were discussed previously, data summary tables are presented in Tables 8-1 to 8-6 to facilitate this HHE. The COPCs are summarized in Table 8-7.

8.3.1. Soil/Fill

As described in Section 5 of this report, soil/fill samples were collected during the RI from eighteen test pits and 88 soil borings on the Site. The test pit and soil boring locations are depicted on Figure 5-1.

The locations of six soil borings were predetermined as part of the initial scope of the RI, while 82 additional soil borings were installed in a grid pattern to further characterize environmental conditions in the back and side yards of the former manufacturing building at 1132 Seneca Street. Analytical results from the eighteen test pits and six predetermined soil borings are considered representative of Site-wide soil/fill and are described as such in this HHE. The Site-wide soil/fill data summaries, presented in Tables 8-1 and 8-2, include the Phase II SA soil/fill data.

Separate soil/fill data summary tables were prepared to evaluate the results of:

The additional "pre-characterization" samples collected in December 2009 and March 2010 to further characterize soil/fill and evaluate remedial alternatives at 1132 Seneca Street (Table 8-3). These data were not combined with the soil/fill data summaries in Tables 8-1 and 8-2, because they are from four-point composite samples and are biased towards one property. These data are therefore not comparable with the

¹ Rural soil background concentrations are from the rural soil survey conducted by the NYSDEC and New York State Department of Health (Appendix D; NYSDEC, 2006).





| TABLE 8-1 |
|---|
| Site-wide Surface Soil/Fill Data Summary and Comparison to Screening Values |
| Human Health Evaluation |
| 1132 and 1146 Seneca Street, Buffalo, New York |

| Chemical | Frequency of Detection | Range of Detected Concentrations | New York State Brownfield Cleanup Program Soil Cleanup Objectives ⁽¹⁾ Restriced Use - Industrial | Chemical of Potential Concern (COPC)? | Range of Concentrations in New York State Rural Soils ⁽²⁾ | | | | |
|--|---------------------------|-------------------------------------|--|--|---|--|--|--|--|
| Volatile Organic Compounds (µg/kg) | 1 | | | | | | | | |
| Acetone | 9 / 26 | 8 J - 260 | 1,000,000 ^a | No | Not applicable | | | | |
| Benzene | 1 / 26 | 3 J | 89,000 | No | Not applicable | | | | |
| 2-Butanone (Methyl ethyl ketone) | 3 / 26 | 11 J - 46 | 1,000,000 ^a | No | Not applicable | | | | |
| Chlorobenzene | 1 / 26 | 240 | 1,000,000 ^a | No | Not applicable | | | | |
| 1,2-Dichlorobenzene | 1 / 26 | 3.8 J | 1,000,000 ^a | No | Not applicable | | | | |
| 1,3-Dichlorobenzene | 2 / 26 | 5.9 J - 34 | 560,000 | No | Not applicable | | | | |
| 1,4-Dichlorobenzene | 2 / 26 | 3.7 J - 58 | 250,000 | No | Not applicable | | | | |
| Isopropylbenzene | 1 / 26 | 6 J | NA | Yes | Not applicable | | | | |
| Methylcyclohexane | 1 / 26 | 2 J | NA | Yes | Not applicable | | | | |
| Methylene chloride | 14 / 26 | 1.5 J - 20 | 1,000,000 ^a | No | Not applicable | | | | |
| 1,2,4-Trichlorobenzene | 3 / 26 | 2 J - 250 | NA | Yes | Not applicable | | | | |
| Semi-volatile Organic Compounds (µg/kg) | | | | | | | | | |
| Acenaphthene | 4 / 26 | 10 J - 2,600 J | 1,000,000 ^a | No | < 8 - 110 | | | | |
| Acenaphthylene | 2 / 26 | 16 J - 17 J | 1,000,000 ^a | No | < 10 - 590 | | | | |
| Anthracene | 6 / 26 | 18 J - 4,300 J | 1,000,000 ^a | No | < 8 - 150 | | | | |
| Benzo(a)anthracene | 17 / 26 | 57 J - 7,900 J | 11,000 | No | < 5 - 2,600 | | | | |
| Benzo(a)pyrene | 16 / 26 | 39 J - 6,100 J | 1,100 | Yes | < 6 - 3,400 | | | | |
| Benzo(b)fluoranthene | 17 / 26 | 68 J - 9,900 J | 11,000 | No | < 18 - 4,600 | | | | |
| Benzo(g,h,i)perylene | 12 / 26 | 33 J - 3,200 J | 1,000,000 ^a | No | < 15 - 1,500 | | | | |
| Benzo(k)fluoranthene | 6 / 26 | 22 J - 390 J 50 J | 110,000 | No | < 12 - 1,700 | | | | |
| 1,1-Biphenyl Carbazole | 1 / 26 2 / 26 | 50 J 30 J - 2,200 J | NA | Yes Yes | NA < 8 - 150 | | | | |
| Chrysene | 17 / 26 | 63 J - 7,800 J | 110,000 | No | < 11 - 2,400 | | | | |
| Dibenzo(a,h)anthracene | 4 / 26 | 9 J - 170 J | 1,100 | No | < 10 - 230 | | | | |
| Dibenzofuran | 2 / 26 | 120 J - 1,600 J | 1,000,000 ª | No | < 11 - 93 | | | | |
| bis(2-Ethylhexyl)phthalate | 1 / 26 | 78 J | NA | Yes | NA | | | | |
| Fluoranthene | 19 / 26 | 120 J - 18,000 | 1,000,000 ª | No | < 5 - 1,800 | | | | |
| Fluorene | 4 / 26 | 19 J - 2,600 J | 1,000,000 ^a | No | < 10 - 130 | | | | |
| Indeno(1,2,3-cd)pyrene | 14 / 26 | 18 J - 2,900 J | 11,000 | No | < 8 - 1,400 | | | | |
| 2-Methylnaphthalene | 5 / 26 | 24 J - 910 J | NA | Yes | < 6 - 53 | | | | |
| 4-Methylphenol (p-Cresol) | 1 / 26 | 4,800 | 1,000,000 ^a | No | NA | | | | |
| Naphthalene | 3 / 26 | 18 J - 540 B | 1,000,000 ^a | No | < 0.3 - 26.0 | | | | |
| ' | 16 / 26 | 78 J - 21,000 | 1,000,000 ^a | | | | | | |
| Phenanthrene | 19 / 26 | 95 J - 15,000 | | No | < 8 - 1,100 | | | | |
| Pyrene | | 955 - 15,000 | 1,000,000 ^a | No | < 6 - 2,900 | | | | |
| Polychlorinated biphenyls (PCB) (µg/kg Total PCBs | 19 / 26 | 23 J - 140,000 J | 25,000 | Yes | Not applicable | | | | |
| Metals (mg/kg) | 13 / 20 | 200 140,000 0 | 20,000 | 103 | | | | | |
| Aluminum | 25 / 26 | 3,720 - 20,300 B | NA | Yes | 561 - 20,000 | | | | |
| Antimony | 5/26 | 1 J - 5 J | NA | No | < 0.6 - 5.0 | | | | |
| Arsenic | 24 / 26 | 2.3 J - 28.8 N | 16 ^b | No | < 0.2 - 69 | | | | |
| Barium | 25 / 26 | 58.9 - 704 N* | 10,000 ^c | No | 4 - 743 | | | | |
| Beryllium | 25 / 26 | 0.27 - 1.9 | 2,700 | No | 0.1 - 2.5 | | | | |
| Cadmium | 21 / 26 | 0.12 J - 1.2 | 60 | No | < 0.05 - 4.2 | | | | |
| Calcium ^ | 25 / 26 | 2,640 J - 159,000 | NA | No | 245 - 74,500 | | | | |
| Chromium | 25 / 26 | 4.9 B - 23.1 | 800 ^d | No | 1 - 36 | | | | |
| Cobalt | 25 / 26 | 2.6 - 18.3 | NA | Yes | 0.3 - 15.1 | | | | |
| Copper | 25 / 26 | 4 N - 777 N* | 10,000 ^c | No | 2 - 98 | | | | |
| Iron ^ | 25 / 26 | 8,540 - 39,000 | NA | No | 783 - 29,500 | | | | |
| Lead | 25 / 26 | 9.2 N - 865 E | 3,900 | No | 3 - 110 | | | | |
| Magnesium ^ | 25 / 26 | 404 J - 17,400 | NA | No | 177 - 46,000 | | | | |
| Manganese | 25 / 26 | 42.5 N* - 2,510 | 10,000 ^c | No | 13 - 4,550 | | | | |
| Mercury | 24 / 26 | 0.049 N - 0.486 J | 5.7 ^e | No | 0.01 - 0.34 | | | | |
| Nickel | 25 / 26 | 6.3 E - 38.7 | 10,000 ^c | No | 0 - 49 | | | | |
| Potassium ^ | 25 / 26 | 321 - 2,300 | NA | No | 116 - 2,440 | | | | |
| Selenium | 5 / 26 | 1 J - 20 | 6,800 | No | < 0.4 - 6.5 | | | | |
| Silver | 11 / 26 | 0.124 J - 2.07 | 6,800 | No | < 0.1 - 1.6 | | | | |
| Sodium ^ | 21 / 26 | 100 J - 899 | NA | No | < 39 - 422 | | | | |
| Thallium | 8 / 26 | 0.6 J - 2.2 J | NA | Yes | < 1.6 | | | | |
| Vanadium | 25 / 26 | 9.1 - 33 35 E - 499 E | NA 10.000 S | No | 2 - 38 | | | | |
| Zinc Other (mg///g) | 25 / 26 | 35 E - 499 E | 10,000 ^c | No | 10 - 454 | | | | |
| Other (mg/kg) | 4/00 | 0.062 | 40.000 ° | | | | | | |
| Cyanide, total | 1 / 26 | 0.062 | 10,000 ^c | No | < 2.4 | | | | |

Notes

The surface soil data set comprises samples from depths less than 2 feet below ground surface. This data set includes eight samples from the Phase II Site Assessments for 1132 and 1146 Seneca Street and eighteen samples collected during the Remedial Investigation. ^Chemical is an essential nutrient and was categorically eliminated as a COPC.

NA - Not Available

Data Qualifiers:

J - Estimated value.

B - For organics, analyte was detected in associated method blank. For inorganics, estimated value.

N - Spike sample recovery is not within the quality control limits.

* Spike or duplicate sample analysis is not within the quality control limits.

E - Indicates a value estimate or not reported due to presence of interferences

(1) Soil Cleanup Objectives (SCO) are from Table 11-2 (NYSDEC, 2006), unless otherwise noted.

^a The SCOs for industrial use were capped at a maximum value of 1,000,000 ppm.

^b SCO is the rural soil background concentration as determined by the NYSDEC/NYSDOH rural soil survey (Appendix D; NYSDEC, 2006).

^c The SCOs for metals were capped at a maximum value of 10,000 ppm.

^d SCO is based on toxicity of Chromium VI, as opposed to Chromium III.

^e SCO is for inorganic mercury salts, as opposed to elemental mercury.

(2) Range of rural soil background concentrations are from source-distant data set, in Tables 5a and 6a of Appendix D (NYSDEC, 2006). Bold concentration exceeds the SCO for restricted use - industrial.

TABLE 8-2 Site-wide Subsurface Soil/Fill Data Summary and Comparison to Screening Values Human Health Evaluation 1132 and 1146 Seneca Street, Buffalo, New York

| Chemical | Frequency of | Range of Detected | New York State Brownfield | Chemical of | Range of | | | |
|---|--------------|-------------------|----------------------------|-------------|-------------------|--|--|--|
| Chemical | Detection | Concentrations | Cleanup Program Soil | Potential | Concentrations in | | | |
| | Detection | Concentrations | Cleanup Objectives (1) | Concern | New York State | | | |
| | | | Restriced Use - Industrial | (COPC)? | Rural Soils (2) | | | |
| Volatile Organic Compounds (µq/kg) | | | | | | | | |
| Acetone | 2 / 2 | 29 J - 248 J | 1,000,000 ^a | No | Not applicable | | | |
| 2-Butanone (Methyl ethyl ketone) | 1 / 2 | 67 J | 1.000.000 ^a | No | Not applicable | | | |
| Methylcyclohexane | 1 / 2 | 8 | NA | Yes | Not applicable | | | |
| Methylene chloride | 2 / 2 | 7 - 13.15 J | 1,000,000 ^a | No | Not applicable | | | |
| Toluene | 1 / 2 | 2 J | 1.000.000 ^a | No | Not applicable | | | |
| Semi-volatile Organic Compounds (µg/kg) | | | | | | | | |
| Anthracene | 1/2 | 57 J | 1,000,000 ^a | No | < 8 - 150 | | | |
| Benzo(a)anthracene | 1/2 | 120 J | 11,000 | No | < 5 - 2,600 | | | |
| Benzo(a)pyrene | 1 / 2 | 81 J | 1,100 | No | < 6 - 3,400 | | | |
| Benzo(b)fluoranthene | 1 / 2 | 83 J | 11,000 | No | < 18 - 4,600 | | | |
| Benzo(g,h,i)perylene | 1 / 2 | 52 J | 1,000,000 ^a | No | < 15 - 1,500 | | | |
| Benzo(k)fluoranthene | 1/2 | 41 J | 110,000 | No | < 12 - 1,700 | | | |
| Chrysene | 1 / 2 | 97 J | 110,000 | No | < 11 - 2,400 | | | |
| Fluoranthene | 1 / 2 | 250 J | 1,000,000 ^a | No | < 5 - 1,800 | | | |
| Fluorene | 1/2 | 20 J | 1,000,000 ^a | No | < 10 - 130 | | | |
| Indeno(1,2,3-cd)pyrene | 1/2 | 46 J | 11,000 | No | < 8 - 1,400 | | | |
| Phenanthrene | 1/2 | 190 J | 1.000.000 ^a | No | < 8 - 1,100 | | | |
| Pvrene | 1/2 | 210 J | 1,000,000 ^a | No | < 6 - 2,900 | | | |
| Polychlorinated biphenyls (PCB) (µg/kg, | | 2100 | 1,000,000 | | 0 2,000 | | | |
| Total PCBs | 2 / 2 | 42.5 J - 137 | 25,000 | No | Not applicable | | | |
| Metals (mg/kg) | | | | | | | | |
| Aluminum | 2/2 | 8,040 * - 24,500 | NA | Yes | 561 - 20,000 | | | |
| Arsenic | 2/2 | 4.8 N - 12.9 B | 16 ^b | No | < 0.2 - 69 | | | |
| Barium | 2/2 | 68.4 N* - 154 J | 10,000 ^c | No | 4 - 743 | | | |
| Beryllium | 2/2 | 0.36 - 1.7 | 2,700 | No | 0.1 - 2.5 | | | |
| Cadmium | 2/2 | 0.42 - 0.50 | 60 | No | < 0.05 - 4.2 | | | |
| Calcium ^ | 2/2 | 4,435 - 23,500 * | NA | No | 245 - 74,500 | | | |
| Chromium | 2/2 | 12.5 - 27 | 800 ^d | No | 1 - 36 | | | |
| Cobalt | 2/2 | 7 - 30 | NA | Yes | 0.3 - 15.1 | | | |
| Copper | 2/2 | 12.1 J - 19.1 N* | 10,000 ^c | No | 2 - 98 | | | |
| Iron ^ | 2/2 | 15,700 - 88,100 | NA | No | 783 - 29,500 | | | |
| Lead | 2/2 | 20.7 E - 44 | 3,900 | No | 3 - 110 | | | |
| Magnesium ^ | 2/2 | 2,985 B - 7,620 E | NA | No | 177 - 46,000 | | | |
| Manganese | 2/2 | 343 - 1,650 B | 10,000 ° | No | 13 - 4,550 | | | |
| Mercury | 2/2 | 0.062 N - 0.078 J | 5.7 ^e | No | 0.01 - 0.34 | | | |
| Nickel | 2/2 | 17.05 - 17.6 E | 10,000 ^c | No | 0 - 49 | | | |
| Potassium ^ | 2/2 | 1,090 - 1,470 | NA | No | 116 - 2,440 | | | |
| Silver | 1 / 2 | 0.15 J | 6,800 | No | < 0.1 - 1.6 | | | |
| Sodium ^ | 2/2 | 225 - 290 | NA | No | < 39 - 422 | | | |
| Vanadium | 2/2 | 15.4 E - 74 | NA | Yes | 2 - 38 | | | |
| Zinc | 2/2 | 53.8 E - 174 | 10,000 ^c | No | 10 - 454 | | | |

Notes

The subsurface soil data set comprises samples from depths greater than 2 feet below ground surface. This data set includes only two samples: B-6 (10-11.4) from the Phase II Site Assessment (SA) for 1132 Seneca Street and TP-5 (3.5-4.5) from the Remedial Investigation (RI). Results of the duplicate sample TP-DUPL #1 were averaged with those of the corresponding sample, TP-5 (3.5-4.5).

^ Chemical is an essential nutrient and was categorically eliminated as a COPC.

NA - Not Available

Data Qualifiers:

J - Estimated value.

* Spike or duplicate sample analysis is not within the quality control limits.

N - Spike sample recovery is not within the quality control limits.

B - For organics, analyte was detected in associated method blank. For inorganics, estimated value.

E - Indicates a value estimate or not reported due to presence of interferences

(1) Soil Cleanup Objectives (SCO) are from Table 11-2 (NYSDEC, 2006), unless otherwise noted.

^a The SCOs for industrial use were capped at a maximum value of 1,000,000 ppm.

^b SCO is the rural soil background concentration as determined by the NYSDEC/NYSDOH rural soil survey (Appendix D; NYSDEC, 2006).

^c The SCOs for metals were capped at a maximum value of 10,000 ppm.

^d SCO is based on toxicity of Chromium VI, as opposed to Chromium III.

^e SCO is for inorganic mercury salts, as opposed to elemental mercury.

(2) Range of rural soil background concentrations are from source-distant data set, in Tables 5a and 6a of Appendix D (NYSDEC, 2006). Bold concentration exceeds the SCO for restricted use - industrial.

TABLE 8-3 Interim Remedial Measures (IRM) Soil/Fill Data Summaries and Comparison to Screening Values Human Health Evaluation 1132 and 1146 Seneca Street, Buffalo, New York

| Loading Dock IRM Area (IRM1) Post-Excavation Soil/Fill Sample Data ⁽¹⁾ | | | | | |
|---|--|---------------------------|----------------------------|-----|--|
| Chemical | ical Frequency of Range of Detected New York State Brownfield Chemical of Pote | | | | |
| | Detection Concentrations Cleanup Program Soil Cleanup Concern (COP | | Concern (COPC)? | | |
| | Objectives ⁽²⁾ | | | | |
| | | | Restriced Use - Industrial | | |
| Polychlorinated biphenyls (PCB) (μg/kg) | | | | | |
| Total PCBs | 6 / 7 | 17.8 J - 360,000 J | 25,000 | Yes | |

| North IRM Area (IRM2) Post-Excavation Soil/Fill Sample Data ⁽³⁾ | | | | | |
|--|---------------------------|----------------|--------|--|--|
| Chemical | Frequency of Detection | | | Chemical of Potential Concern (COPC)? | |
| PCBs (µg/kg) | | | | | |
| Total PCBs | 5 / 5 | 14 J - 1,900 J | 25,000 | No | |

Notes

(1) Post-excavation samples were collected in October 2009 from the four walls and bottom of the excavation near the loading dock at the back of the former manufacturing building at 1132 Seneca Street. The composition of the south wall is wood; the west wall is concrete.

(2) Soil Cleanup Objectives (SCO) are from Table 11-2 (NYSDEC, 2006), unless otherwise noted.

(3) Post-excavation samples were collected from the four walls and bottom of the excavation in the back yard of the former manufacturing building at 1132 Seneca Street. Sidewall samples were collected from depths of 0-2 feet bgs. The bottom sample was collected from native soil at 2.9 feet bgs. Results of the duplicate sample IRM2-DUP#1 were averaged with those of the corresponding sample, IRM2-North.

J - Estimated value.

Bold concentration exceeds the SCO for restricted use - industrial.

TABLE 8-4 Pre-Characterization Soil/Fill Data ⁽¹⁾ Summary and Comparison to Screening Values Human Health Evaluation 1132 and 1146 Seneca Street, Buffalo, New York

| Chemical | Frequency of Detection | Range of Detected Concentrations | New York State Brownfield Cleanup Program Soil Cleanup Objectives ⁽²⁾ Restriced Use - Industrial | Chemical of Potential Concern (COPC)? | | |
|-----------------------------------|---|----------------------------------|--|---|--|--|
| Polychlorinated biphenyls (PCB) (| Polychlorinated biphenyls (PCB) (μg/kg) | | | | | |
| Total PCBs ^ | 40 / 45 | 29 - 2,070,000 J | 25,000 | Yes | | |
| Total PCBs ^^ | 2/2 | 4,870 J - 11,800 J | 25,000 | No | | |

Notes

(1) Pre-Characterization soil/fill samples were collected in December 2009 and March 2010 to further characterize environmental conditions in the back and side yards of the former manufacturing building at 1132 Seneca Street.

(2) Soil Cleanup Objectives (SCO) are from Table 11-2 (NYSDEC, 2006), unless otherwise noted.

^ Sample depth intervals are within 0-2 feet below ground surface (bgs).

^^ Sample depth intervals are greater than 2 feet bgs.

J - Estimated value.

Bold concentration exceeds the SCO for restricted use - industrial.

TABLE 8-5 Shallow Groundwater Data Summary and Comparison to Screening Values Human Health Evaluation 1132 and 1146 Seneca Street, Buffalo, New York

| Chemical | Frequency of | Range of Detected | NYSDEC Class | Chemical of Potential |
|---|----------------|----------------------------------|-----------------------------|-----------------------|
| | Detection | Concentrations | GA Standards ⁽¹⁾ | Concern (COPC)? |
| Volatile Organic Compounds (µg/L) | | I | | |
| Acetone | 1/4 | 10 | 50 ^a | No |
| Benzene | 1/4 | 0.59 J | 1 | No |
| Cyclohexane | 1/4 | 0.61 J | NA | Yes |
| Methylcyclohexane | 1/4 | 0.9 J | NA | Yes |
| Methylene chloride | 1/4 | 1.2 J | 5 | No |
| Toluene | 1/4 | 3.6 | 5 | No |
| Xylenes, total | 1/4 | 2.2 | 5 | No |
| Semi-volatile Organic Compounds (| | - | | |
| Acetophenone | 1/4 | 2.4 J | NA | Yes |
| Anthracene | 1/4 | 1.38 J | 50 ^a | No |
| Benzaldehyde | 1/4 | 3.5 J | NA | Yes |
| Benzo(a)anthracene | 1/4 | 1.42 H4, J | 0.002 ^a | Yes |
| Benzo(a)pyrene | 1/4 | 1.46 J | Non-detect | Yes |
| Benzo(b)fluoranthene | 1/4 | 0.38 H4, J | 0.002 ^a | Yes |
| Benzo(g,h,i)perylene | 1/4 | 1.4 J | NA | Yes |
| Benzo(k)fluoranthene | 1/4 | 0.26 H4, J | 0.002 ^a | Yes |
| Chrysene | 1/4 | 1.4 H4, J | 0.002 ^a | Yes |
| Diethyl phthalate | 2/4 | 0.17 J - 1.2 J | 50 ª | No |
| Dietnyi phinalate Di-n-butyl phthalate | 4/4 | 0.17 J - 1.2 J 0.36 J - 1.7 J | 50 | No |
| bis(2-Ethylhexyl)phthalate | 4/4 | 4.9 | 5 | No |
| Fluoranthene | 1/4 | 4.9 0.75 H4, J | 50 ° | No |
| | 1/4 | 1.37 J | | |
| Indeno(1,2,3-cd)pyrene | - | | 0.002 ^a | Yes |
| 2-Methylnaphthalene | 1 / 4 2 / 4 | 0.58 H4, J | NA | Yes |
| Phenanthrene | - | 0.75 J - 1.58 J | 50 ^a | No |
| Phenol | 2/4 | 0.92 H4, J - 4.93 | 1 | Yes |
| <i>Metals (µg/L)</i> Aluminum | 4 / 4 | 696 - 4.260 | NA | Yes |
| Arsenic | 2/4 | 8.1 J - 14 | 25 | No |
| Barium | 4 / 4 | 67 - 151 | 1,000 | No |
| Beryllium | 2 / 4 | 0.25 J - 0.4 J | 3 ^a | No |
| Calcium^ | 4/4 | 145,000 - 302,000 | NA | No |
| Chromium | 4 / 4 | 1.15 J - 7.4 | 50 ^b | No |
| Cobalt | 3/4 | 3.2 J - 4.4 | NA | Yes |
| Copper | 4 / 4 | 2.2 J - 13 | 200 | No |
| Iron^ | 4/4 | 1,100 - 11,200 | 300 | No |
| Lead | 1/4 | 7.4 | 25 | No |
| Magnesium^ | 4 / 4 | 31,000 - 54,200 | 35,000 ª | No |
| Manganese | 4/4 | 285 - 2,270 | 300 | Yes |
| Nickel | 4 / 4 | 2.4 J - 8.9 J | 100 | No |
| Potassium^ | 4 / 4 | 6,910 J - 1,7500 J | NA | No |
| Sodium^ | 4/4 | 15,400 - 148,500 | 20,000 | No |
| Vanadium | 4/4 | 2.0 J - 8.7 | NA | Yes |
| Zinc | 4 / 4 | 4.0 J - 26 | 2,000 ^a | No |
| | 4/4 | 4.0 J - 20 | 2,000 | INU |

Notes

The groundwater data set consists of four samples that were collected from monitoring wells installed during the Remedial Investigation. Results of one duplicate sample were averaged with those of the corresponding sample, B-1.

Polychlorinated biphenyls were also analyzed for but were not detected.

^Chemical is an essential nutrient and was categorically eliminated as a COPC.

NA - Not Available

(1) Class GA ambient water quality standards and guidance values are from Technical & Operational Guidance Series (TOGS) 1.1.1 (NYSDEC, 1998)

a - Guidance Value

b - Groundwater quality standard applies to both Cr III and Cr VI.

Data Qualifiers:

J - Estimated value.

Bold concentration exceeds applicable groundwater quality standard or guidance value.

TABLE 8-6Sub-slab Soil Vapor Data Summary and Comparison to Screening ValuesHuman Health Evaluation1132 and 1146 Seneca Street, Buffalo, New York

| Chemical | Frequency of | Range of | NYSDOH Air | USEPA RSL for |
|------------------------------|----------------------|----------------|--------------------|-----------------------------|
| | Detection | Detected | Guideline | Industrial Air ² |
| | | Concentrations | Value ¹ | |
| Volatile Organic Compounds (| (μg/m ³) | | | |
| Acetone | 4 / 4 | 29 - 260 | NA | 140,000 |
| Benzene | 4 / 4 | 1.3 - 4.2 | NA | 0.41 |
| 1,3-Butadiene | 1 / 4 | 1.8 | NA | 0.41 |
| Carbon disulfide | 3 / 4 | 2.3 - 14 | NA | 3,100 |
| Chloromethane | 1 / 4 | 1.3 | NA | 390 |
| Cyclohexane | 4 / 4 | 2.65 - 10 | NA | 26,000 |
| Dichlorodifluoromethane | 1 / 4 | 2.7 | NA | 880 |
| Ethylbenzene | 3 / 4 | 1.7 - 23 | NA | 4.9 |
| n-Heptane | 4 / 4 | 3.6 - 41 | NA | NA |
| n-Hexane | 4 / 4 | 8.65 - 74 | NA | 3,100 |
| Methyl ethyl ketone | 4 / 4 | 2.3 - 9.4 | NA | 22,000 |
| Methylene chloride | 1 / 4 | 1.4 | 60 | 26 |
| Styrene | 1 / 4 | 6.85 | NA | 4,400 |
| Toluene | 4 / 4 | 3.1 - 11 | NA | 22,000 |
| 1,1,1-Trichloroethane | 3 / 4 | 6 - 82 | NA | 22,000 |
| Trichlorofluoromethane | 3 / 4 | 2.4 - 3.6 | NA | 3,100 |
| 1,2,4-Trimethylbenzene | 3 / 4 | 1.3 - 4.6 | NA | 31 |
| 1,3,5-Trimethylbenzene | 1 / 4 | 0.98 | NA | NA |
| Xylene (m,p) | 4 / 4 | 8.3 - 120 | NA | 3,100 |
| Xylene (o) | 4 / 4 | 3.2 - 41 | NA | 3,100 |

Notes

The soil vapor data set comprises four sub-slab soil vapor samples collected during the Remedial Investigation. Results of one duplicate sample were averaged with those of the corresponding sample, SV-4.

NA = Not Available

(1) New York State Department of Health Air Guideline Values (Table 3.1; NYSDOH, 2006)

TABLE 8-7 Summary of Chemicals of Potential Concern Human Health Evaluation 1132 and 1146 Seneca Street, Buffalo, New York

| Exposure Medium: | Surface Soil/Fill | Subsurface Soil/Fill | Loading Dock IRM (IRM1) Soil/Fill | IRM North (IRM2) Soil/Fill | Pre-characterization Soil/Fill Data | Shallow Groundwater | Sub-slab Soil Vapor |
|---------------------------------|-------------------|-------------------------|--------------------------------------|-------------------------------|--|------------------------|---------------------|
| Volatile Organic Compounds | | | | | | | |
| Acetone | • | • | N/A | N/A | N/A | • | Х |
| Benzene | • | | N/A | N/A | N/A | • | Х |
| 1,3-Butadiene | | | N/A | N/A | N/A | | Х |
| Carbon disulfide | | | N/A | N/A | N/A | | Х |
| Chloromethane | | | N/A | N/A | N/A | | Х |
| Cyclohexane | | | N/A | N/A | N/A | Х | Х |
| Dichlorodifluoromethane | | | N/A | N/A | N/A | | Х |
| Ethylbenzene | | | N/A | N/A | N/A | | Х |
| n-Heptane | | | N/A | N/A | N/A | | Х |
| n-Hexane | | | N/A | N/A | N/A | | Х |
| Isopropylbenzene | Х | | N/A | N/A | N/A | | |
| Methylcyclohexane | Х | Х | N/A | N/A | N/A | Х | |
| Methylene chloride | • | • | N/A | N/A | N/A | • | Х |
| Methyl ethyl ketone | • | • | N/A | N/A | N/A | | Х |
| Styrene | | | N/A | N/A | N/A | | Х |
| Toluene | | • | N/A | N/A | N/A | • | Х |
| 1,2,4-Trichlorobenzene | Х | | N/A | N/A | N/A | | |
| 1,1,1-Trichloroethane | | | N/A | N/A | N/A | | Х |
| Trichlorofluoromethane | | | N/A | N/A | N/A | | Х |
| 1,2,4-Trimethylbenzene | | | N/A | N/A | N/A | | Х |
| 1,3,5-Trimethylbenzene | | | N/A | N/A | N/A | | Х |
| Xylene (m,p) | | | N/A | N/A | N/A | • | Х |
| Xylene (o) | | | N/A | N/A | N/A | • | Х |
| Semi-Volatile Organic Compounds | 1 | | 1 · · | | | | |
| Acetophenone | | | N/A | N/A | N/A | X | N/A |
| Benzaldehyde | | | N/A | N/A | N/A | Х | N/A |
| Benzo(a)anthracene | • | • | N/A | N/A | N/A | Х | N/A |
| Benzo(a)pyrene | Х | • | N/A | N/A | N/A | X | N/A |
| Benzo(b)fluoranthene | • | • | N/A | N/A | N/A | Х | N/A |
| Benzo(g,h,i)perylene | • | • | N/A | N/A | N/A | Х | N/A |
| Benzo(k)fluoranthene | • | • | N/A | N/A | N/A | Х | N/A |
| 1,1-Biphenyl | Х | | N/A | N/A | N/A | | N/A |
| Carbazole | X | | N/A | N/A | N/A | | N/A |
| Chrysene | • | • | N/A | N/A | N/A | х | N/A |
| bis(2-Ethylhexyl)phthalate | Х | | N/A | N/A | N/A | • | N/A |
| Indeno(1,2,3-cd)pyrene | • | • | N/A | N/A | N/A | х | N/A |
| 2-Methylnaphthalene | х | | N/A | N/A | N/A | X | N/A |
| Phenol | - | | N/A | N/A | N/A | X | N/A |
| Polychlorinated biphenyls | | | | | | | |
| PCBs, total | X | • | X | • | X | | N/A |
| Metals | | | | | | | · · · · |
| Aluminum | х | x | N/A | N/A | N/A | x | N/A |
| Cobalt | x | x | N/A | N/A | N/A | x | N/A |
| Manganese | • | • | N/A | N/A | N/A | X | N/A |
| Thallium | X | | N/A | N/A | N/A | | N/A N/A |
| Vanadium | • | X | N/A | N/A | N/A | x | N/A |

Notes

X : Selected as a Chemical of Potential Concern (COPC).

Shaded entries are COPCs selected based on exceedance of the screening criteria.

Unshaded entries are COPCs for which no screening criteria are available.

• : Detected, but not selected as a COPC.

--: Not Detected.

N/A : Not Analyzed or Not Applicable

discrete sample results presented in Tables 8-1 and 8-2 and are not representative of conditions across the Site.

Post-excavation samples collected at the loading dock Interim Remedial Measure (IRM) Area (IRM1) and the North IRM Area (IRM2), both of which are located at 1132 Seneca Street (Table 8-4). These data were not combined with the soil/fill data summaries in Tables 8-1 and 8-2, because they are from four-point composite samples and/or were biased toward individual areas of concern.

Site-wide Surface Soil/Fill

For the purposes of this HHE, soil/fill data from across the Site were separated into surface and subsurface soil/fill data sets. The surface soil/fill data set is composed of samples collected between 0-2 feet bgs. As such, eighteen surface soil/fill samples were collected during the RI in October 2009. In addition, eight surface soil/fill samples were collected for the Phase II SAs in March 2008. Surface soil/fill samples from both sampling events were analyzed for Target Compound List (TCL) volatile organic compounds (VOC), semi-volatile organic compounds (SVOC), and polychlorinated biphenyls (PCB, as Aroclors), target analyte list (TAL) metals, and total cyanide.

Table 8-1 presents a combined surface soil/fill data summary, with the frequency of detection and range of detected concentrations for each detected chemical. The screening criteria used to select COPCs in surface soil/fill are the NYSDEC BCP's recommended soil cleanup objectives (SCO) for restricted-industrial use (NYSDEC, 2006). The restricted-industrial SCOs are chemical-specific, risk-based concentrations in soil derived to be protective of human exposure on properties that have the "primary purpose of manufacturing, production, fabrication or assembly process and ancillary services" (NYSDEC, 2006). This end use is consistent with the planned future use of the Site as an expansion to Flexo-Transparent, Inc.'s current business. The SCOs consider the ingestion, inhalation, and dermal contact exposure routes and are based on an excess lifetime cancer risk of 10⁻⁶ (i.e., one in a million) and a non-cancer hazard quotient of 1 (NYSDEC, 2006). The SCOs also consider background chemical concentrations in rural soils and maximum acceptable levels of chemicals in soils (e.g., the soil saturation concentration).

Based on the approach outlined in Section 6.3, the following chemicals were selected as COPCs in surface soil/fill:

- VOCs: isopropylbenzene, methylcyclohexane, and 1,2,4-trichlorobenzene.
- SVOCs: benzo(a)pyrene, 1,1-biphenyl, carbazole, bis(2-ethylhexyl)phthalate, and 2-methylnaphthalene.
- PCBs: total PCBs (i.e., sum of the detected Aroclors).





• Metals: aluminum, cobalt, and thallium.

Seven of the nine organic chemicals [i.e., isopropylbenzene, methylcyclohexane, 1,2,4trichlorobenzene, 1,1-biphenyl, carbazole, bis(2-ethylhexyl)phthalate, and 2methylnaphthalene] were identified as COPCs based on the lack of corresponding screening criteria. However, United States Environmental Protection Agency (USEPA) Regional Screening Levels (RSL) (USEPA, 2010) for industrial soil are available for five of them. The RSLs are chemical-specific human health risk-based screening levels based on comparable risk levels (i.e., target cancer risk of 10⁻⁶ and a target hazard quotient of 1). As shown in the following table, the maximum detected concentration of each of these chemicals in surface soil/fill is less than the corresponding RSL for industrial soil.

| Chemical of Potential Concern | Maximum Detected Concentration (µg/kg) | USEPA Regional Screening Level for Industrial Soil (µg/kg) |
|----------------------------------|--|--|
| Isopropylbenzene | 6 J | 11,000,000 |
| 1,2,4-Trichlorobenzene | 250 | 99,000 |
| 1,1-Biphenyl | 50 J | 51,000,000 |
| bis(2-Ethylhexyl)phthalate | 78 J | 120,000 |
| 2-Methylnaphthalene | 910 J | 4,100,000 |

The three metals were identified as COPCs based on the lack of corresponding screening criteria and because their maximum detected concentrations were greater than rural soil background concentrations. However, USEPA RSLs are available for aluminum and cobalt. As shown in the following table, the maximum detected concentrations of these metals are less than the corresponding USEPA RSL for industrial soil.





| Chemical of Potential Concern | Maximum Detected Concentration (mg/kg) | USEPA Regional Screening Level for Industrial Soil (mg/kg) |
|----------------------------------|--|--|
| Aluminum | 20,300 B | 990,000 |
| Cobalt | 18.3 | 300 |

Site-wide Subsurface Soil/Fill

Only two samples were collected during the RI or Phase II SAs from soil/fill material at depths greater than 2 feet bgs and therefore comprise the subsurface soil/fill data set. Subsurface soil/fill samples were analyzed for TCL VOCs, SVOCs, and PCBs (as Aroclors), TAL metals, and total cyanide. Table 8-2 presents a subsurface soil/fill data summary, with the frequency of detection and range of detected concentrations for each detected chemical.

The screening criteria used to select COPCs in subsurface soil/fill are the NYSDEC BCP's recommended SCOs for restricted-industrial use, referenced above. Based on the approach outlined in Section 6.3, the following chemicals were selected as COPCs in subsurface soil/fill:

- VOCs: methylcyclohexane.
- Metals: aluminum, cobalt, and vanadium.

Methylcyclohexane was identified as a COPC based on the lack of a corresponding screening criterion. The metals were identified as COPCs based on the lack of corresponding screening criteria and because their maximum detected concentrations were greater than rural soil background concentrations. However, as shown below, the maximum detected metals concentrations are less than the corresponding USEPA RSLs for industrial soil.





| Chemical of Potential Concern | Maximum Detected Concentration (mg/kg) | USEPA Regional Screening Level for Industrial Soil (mg/kg) |
|----------------------------------|--|--|
| Aluminum | 24,500 | 990,000 |
| Cobalt | 30 | 300 |
| Vanadium | 74 | 5,200 |

IRM Area Soil/Fill

Confirmation soil samples were collected from two excavation areas: the loading dock IRM Area (IRM1) and North IRM Area (IRM2). As described in Section 4, four-point composite samples were collected from the four walls and bottom of IRM north and discrete samples from the loading dock IRM. All IRM samples were analyzed for PCBs (as Aroclors). At IRM1, two grab samples were collected from the west, north, and the bottom of the excavation and one grab sample collected from the west, north, and south walls.

Table 8-3 presents the frequency of detection and range of total PCB concentrations detected in samples from each IRM Area. The SCO for restricted-industrial use was used to screen the maximum detected total PCB concentrations. As shown, total PCBs was identified as a COPC in soil/fill at the loading dock IRM Area but not in soil/fill at the North IRM Area.

Pre-Characterization Soil/Fill

As described in Section 5, a total of 82 soil borings were advanced (in two phases) to further characterize soil/fill at 1132 Seneca Street. Borings were drilled at approximate 20-feet spacing on a grid pattern to the north, west, and east of the former manufacturing building. Four-point composite samples were collected and analyzed for PCBs (as Aroclors). Figure 5-1 depicts the relative location of the pre-characterization sampling grid and soil borings. Based on the analytical results of the initial RI test pit and soil boring samples, the uppermost six inches of soil was sampled separately from the underlying fill material.





Table 8-4 presents the frequency of detection and range of total PCB concentrations detected in the pre-characterization samples. The SCO for restricted-industrial use was used to screen the maximum detected total PCB concentrations. As shown, total PCBs was identified as a COPC in surface soil/fill (0 to 2-feet) but not in subsurface soil/fill (> 2.0 feet) samples.

8.3.2. Groundwater

Temporary shallow groundwater monitoring wells were installed at five borehole locations (B/MW-1 to B/MW-5) on the Site. Total well depths ranged from 4.0 to 9.8 feet bgs. One round of groundwater samples was collected from three wells (B/MW-1, B/MW-2 and B/MW-5) on October 22, 2009 and from B/MW-4 on November 3-4, 2009.² Depths to shallow groundwater during sample collection ranged from 2.6 to 6.1 feet bgs. Groundwater samples were analyzed for TCL VOCs, SVOCs, pesticides, and PCBs (as Aroclors), TAL metals, and cyanide.

Table 8-5 presents a groundwater data summary, with the frequency of detection and range of detected concentrations for each chemical. As shown, no PCBs were detected in groundwater. The detection frequency of almost all of the VOCs and SVOCs was one in four samples, and almost all of the detected concentrations were qualified as estimated.

The screening criteria used to select COPCs are the NYSDEC "Class GA" ambient water quality standards and guidance values (NYSDEC, 1998). Based on the approach outlined in Section 6.3, the following chemicals were selected as COPCs in groundwater at the Site:

- VOCs: cyclohexane and methylcyclohexane.
- SVOCs: acetophenone, benzaldehyde, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, indeno(1,2,3-cd)pyrene, 2-methylnaphthalene, and phenol.
- Inorganics: aluminum, cobalt, manganese, and vanadium.

Six of the thirteen organic chemicals [i.e., cyclohexane, methylcyclohexane, acetophenone, benzaldehyde, benzo(g,h,i)perylene, and 2 methylnaphthalene] and three of the four metals (aluminum, cobalt, and vanadium) were identified as COPCs based on the lack of corresponding screening criteria. However, USEPA RSLs for tapwater are available for seven of them. As shown in the following table, the maximum detected concentration of each of these chemicals in groundwater is less than the corresponding RSL for tapwater.

² B/MW-3 has been dry since monitoring well installation and therefore was not sampled.





| Chemical of Potential Concern | Maximum Detected Concentration (ug/L) | USEPA Regional Screening Level for Tapwater (ug/L) |
|-------------------------------|--|---|
| Cyclohexane | 0.61 J | 13,000 |
| Acetophenone | 2.4 J | 3,700 |
| Benzaldehyde | 3.5 J | 3,700 |
| 2- Methylnaphthalene | 0.58 J | 150 |
| Aluminum | 4,260 | 37,000 |
| Cobalt | 4.4 | 11 |
| Vanadium | 8.7 | 180 |

8.3.3. Sub-slab Soil Vapor

Soil vapor samples were collected at four locations (SV-1 to SV-4) from beneath the concrete floor slab foundation of the building at 1132 Seneca Street on October 22, 2009.

Table 8-6 presents a sub-slab soil vapor summary, with the frequency of detection and range of detected chemical concentrations for each chemical.

New York State does not have criteria or guidance values to evaluate detected concentrations of VOCs in sub-slab soil vapor. Instead, the Guidance for Evaluating Soil Vapor Intrusion in the State of New York (NYSDOH, 2006) recommends evaluation of soil vapor data in conjunction with indoor and outdoor air data. The soil vapor data can also be directly compared to air guideline values derived by the New York State Department of Health (NYSDOH); however, this is a conservative approach because it assumes no attenuation, and guidelines are only available for one detected chemical: methylene chloride. USEPA RSLs for industrial air are presented in the data summary table to benchmark the detected VOC concentrations in sub-slab soil gas in a similarly conservative approach. However, since the NYSDOH does not advocate the use of a risk-based, screening-level approach for evaluating soil gas data, all detected VOCs in soil gas are retained as COPC.

8.4. Exposure Assessment

The objective of the exposure assessment is to estimate the type of and potential for human exposure to the COPCs that are present in, or may migrate from, environmental media at the Site. The exposure assessment considers human populations that may be





exposed to COPCs at the Site, currently and in the future, and evaluates the pathways and routes by which these receptors may be exposed.

The exposure assessment is facilitated through the development of a conceptual Site model (CSM), designated Figure 8-1. The CSM is a graphic illustration that outlines chemical source areas, chemical release mechanisms, environmental media that currently show or may show the presence of chemicals in the future, possible exposure pathways, potentially-exposed human receptor populations, and exposure routes to those receptors. It considers current exposure scenarios, as well as the most likely future exposure scenarios based on the anticipated re-use of the Site as a light industrial facility with associated asphalt-paved driveways and parking areas. The CSM is used to facilitate evaluation of all potentially complete exposure pathways and routes through which humans may be exposed to COPCs in sampled environmental media.

8.4.1. Potentially Exposed Populations

The potential for human exposure was considered under both current/future and future land use scenarios based on the Site description in Section 6.1. The following categories of human receptors (termed "potentially exposed populations") were identified:

Current/Future

Trespassers: (adults and adolescents) who may live in the vicinity of the Site. While trespassing may occur on the Site, there are access restrictions that would deter potential trespassers, such as the chain-link fence along the southern, eastern, and western sides of the Site and along the northern side of the 1132 property. In addition, overgrown vegetation impedes access from the northern side of the 1146 property. It is not expected that trespassers would obtain access to the inside of the currently vacant former industrial building on the Site.

Future

- Construction Workers: (adults) who may perform future work at the Site to redevelop the Site and/or renovate the existing building.
- <u>Construction/Utility Workers</u>: (adults) who may perform future work at the Site to install and/or maintain buried utilities.
- Indoor Site Workers/Visitors: (adults and adolescents, aged 16-18 years) who may visit or work inside buildings on the Site in the future. The exposure frequency of visitors would be less than that of indoor Site workers.

8.4.2. Exposure Pathways

Chemical release mechanisms under current/future and future land use scenarios and in the absence of Site remediation are summarized in Table 8-8. The potential human receptors and the likelihood of receptor exposure to COPCs in soil/fill, groundwater, and sub-slab soil vapor are summarized, with descriptions justifying the inclusion of





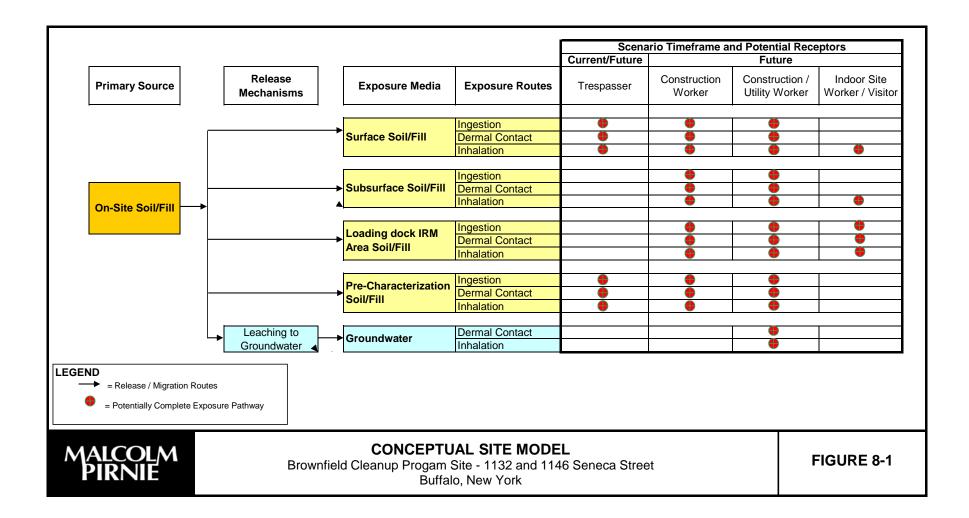


TABLE 8-8 Chemical Release Mechanisms in the Absense of Remedial Action Human Health Evaluation 1132 and 1146 Seneca Street, Buffalo, New York

| Source Media | Release Mechanism | Exposure Medium | Site Conditions | Viable Current Release Scenario? | Viable Future Release Scenario? |
|-------------------|----------------------|---|---|---|--|
| | - | | The BCP site contains a former manufacturing building and an immediately adjacent vacant parcel. The site is located in a mixed commercial/industrial and residential area. It is surrounded by chain-link fencing on the south, east, and west sides; locked gates limit access along the southern boundary with Seneca Street. The northern side is not fenced but access is impeded by overgrown vegetation. | Yes - surface soil/fill samples were collected for laboratory analysis, and data are considered representative of conditions across the site. COPCs were identified in the site-wide surface soil/fill data set. As such, treaspassers accessing the site may be exposed to COPCs in surface soil/fill. | Yes - the anticipated future use of the site is as a commercial or light industrial facility. In the absence of site remediation, construction workers and construction/utility workers may contact COPCs in surface soil/fill during future building renovation or construction, utilites installation, repair, and/or maintenance, and other future site activities. |
| | _ | Soil/Fill (>2.0') | Subsurface materials consist of black-gray, fine to coarse grain sand with silt and trace clay admixed with construction and demolition debris composed of wood, concrete, brick, and gravel. Fill materials range in thickness from 0.5 to 3.7 feet below grade. Native silt/sand and clay are present beneath the fill layer. Depth to bedrock is approximately 10 feet below grade. | No - subsurface soil/fill samples were collected for laboratory analysis, and data are considered representative of conditions across the site. COPCs were identified in the site-wide surface soil/fill data set. However, under the current scenario, it is not expected that trespassers accessing the site would contact COPCs in subsurface soil/fill. | Yes - the anticipated future use of the site is as a light industrial facility. Future building renovation and new building construction will necessitate intrusion to the subsurface. In addition, future construction/utility work may disturb subsurface soil/fill. In the absence of site remediation, construction workers and construction/utility workers may contact COPCs in subsurface soil/fill. |
| | | Loading Dock IRM Area (IRM1) Soil/Fill | Soil/fill materials beneath the former loading dock at the back of the former manufacturing building at 1132 Seneca Street were excavated and removed for off-site disposal. The excavation area measures approximately 700 square feet and has not been backfilled. | No - The Site building is locked and no evidence of treaspasser entry has been observed. | Yes - the assumed future use of the site is as a light industrial facility. Future building renovation and potential new building construction may disturb soli/fill near the Loading Dock IRM Area. In the absence of site remediation, construction workers, construction/utility workers, and interior workers/visitors may contact PCBs in subsurface soil/fill. |
| On-Site Soil/Fill | - | Pre-Characterization Soil/Fill | Soil/fill materials in the back and side yards of the 1132 Seneca Street property were sampled for PCB analyses. Soil borings were installed according to a grid that measures approximately 33,000 square feet. | Yes - pre-characterization samples were collected for laboratory analysis, and total PCBs was identified as a COPC. Given this area of the site is outside the former manufacturing building and in a relatively cleared area, trespassers accessing the site may be exposed to PCBs in pre-characterization soil/fill. | Yes - the assumed future use of the site is as a light industrial facility. Future building renovation and potential new building construction may disturb pre- characterization soil/fill. In the absence of site remediation, construction workers and construction/utility workers may contact PCBs in subsurface soil/fill. |
| | Leaching | | and mapping of the shallow overburden groundwater, | No - shallow groundwater samples were collected for laboratory analysis, and data are considered representative of conditions across the site. COPCs were identified in groundwater. However, it is not expected that human receptors would contact COPCs in shallow groundwater under the current scenario. | Yes - the anticipated future use of the site is as a light industrial facility. Future construction/utility work to install and/or maintain buried utilities may necessitate intrusion to the subsurface such that the shallow groundwater table is intercepted. Therefore, construction/utility workers may contact COPCs in shallow groundwater. Construction workers are not expected to contact COPCs in shallow groundwater. However, this scenario may need to be reevaluated depending on the nature of the construction work (e.g., basement construction for a new building). |
| | Vapor Intrusion | Indoor Air | The building at 1132 Seneca Street, which is currently vacant has a concrete floor slab foundation. | No - Sub-slab soil vapors under the concrete floor slab foundation contain low concentrations of a variety of VOCs, all of which were retained as COPCs. However, since the building is vacant, human receptors are not exposed to indoor air. | No - while the anticipated future use of the site is as a light industrial facility, using the exisitng building and COPCs were retained in soil vapor due to the lack of NYSDOH screening criteria, the detected COPC concentrations are low. The existing concrete floor slab in the existing building and the foundation should adequately mitigate the potential for vapor intrusion. |

Notes COPC - Chemical of Potential Concern

potentially complete exposure pathways. The exposure pathways identified as potentially complete are illustrated in the CSM (Figure 8-1) and are discussed with regard to their likelihood, below.

8.4.2.1. Current/Future Land Use Scenario

The following exposure scenarios were based on current Site conditions and are expected to exist in the future, in the absence of further Site remediation.

Trespasser: Based on the current use of the Site, the following exposure pathways are identified as potentially complete:

Dermal contact with and incidental ingestion and inhalation of COPCs in surface soil/fill. COPCs in surface soil/fill could be released to the ambient air by wind or mechanical erosion. These exposure pathways are limited to those areas of the Site not covered by the former manufacturing building footprint (1132 Seneca Street) or other impervious surfaces and are mitigated by the fact that the vacant property (1146 Seneca Street) is covered with vegetation, which limits soil disturbance. In addition, under the future land use scenario, it is anticipated the majority of the Site will be covered with impervious surfaces (e.g., buildings or asphalt-paved parking lots).

8.4.2.2. Future Land Use Scenario

The following additional exposure scenarios, which may occur in the future, were evaluated based on the potential redevelopment of the Site as a light industrial facility, with associated asphalt-paved driveways and parking areas, and in the absence of further Site remediation.

<u>**Construction Worker**</u>: Based on the anticipated future use of the Site as a light industrial facility, the following exposure pathways are identified as potentially complete:

- Dermal contact with and incidental ingestion and inhalation of COPCs in surface soil/fill. COPCs in surface soil/fill could be released to the ambient air by wind or mechanical erosion (e.g., during future Site redevelopment).
- Dermal contact with and incidental ingestion and inhalation of COPCs in subsurface soil/fill. COPCs in subsurface soil/fill could be released by mechanical erosion in the event Site redevelopment necessitates subsurface soil/fill disturbance.

It is assumed the extent of future construction work will be limited to renovation of the existing building and facilities and that intrusive work that intercepts the shallow groundwater table will not be carried out. Therefore, exposure of construction workers to COPCs in shallow groundwater is not expected to occur. Should the nature of future construction work differ (e.g., basement construction for a new building occurs), the assumptions regarding the potential for exposure of future construction workers to COPCs in shallow groundwater should be re-evaluated.





<u>Construction/Utility Worker</u>: Based on the anticipated future use of the Site as a light industrial facility, the following exposure pathways are identified as potentially complete:

- Dermal contact with and incidental ingestion and inhalation of COPCs in surface soil/fill. COPCs in surface soil/fill could be released to the ambient air by wind or mechanical erosion.
- Dermal contact with and incidental ingestion and inhalation of COPCs in subsurface soil/fill. COPCs in subsurface soil/fill could be released by mechanical erosion in the event future construction/utility work necessitates intrusion to the subsurface (e.g., digging of a trench to access utilities).
- Dermal contact with and inhalation of COPCs in shallow groundwater. Depth to groundwater on the Site has been measured as 0.1 to 4.1 feet bgs. It is possible that construction/utility workers may encounter shallow groundwater while performing intrusive work (e.g., in a trench) to install or maintain utilities at the Site.

Indoor Site Worker/Visitor: Based on the anticipated future use of the Site as a light industrial facility, the following exposure pathways are identified as potentially complete:

- Dermal contact with and incidental ingestion and inhalation of PCBs in soil/fill in the sidewalls of the exposed excavation at the loading dock IRM area (IRM1). PCBs in surface soil/fill could be released to the ambient air by mechanical erosion during work in the area.
- Inhalation of VOCs that migrate from sub-slab soil vapor to indoor air of the existing building to be renovated or future buildings that may be constructed on the Site.

Indoor Site workers and visitors are expected to have little, if any, direct contact exposure to COPCs in outdoor soil/fill (including Site-wide and pre-characterization soil/fill), because they would spend the majority of time indoors. Further, under a future exposure scenario, the Site will be completely covered with building footprint, asphalt pavement, or clean soil, thereby eliminating the potential exposure pathway to COPCs in surface soil/fill. In addition, there is no potential for indoor Site workers or visitors to contact COPCs in shallow groundwater through drinking water wells, as the Site has access to a public potable water supply.

8.5. Toxicity Assessment

For each COPC, critical non-carcinogenic and carcinogenic health effects, for oral and inhalation exposures, are presented in Tables 8-9 and 8-10, respectively. The critical health effects presented are those used by the USEPA to derive verified or provisional reference doses and reference concentrations (to assess the potential for chronic non-carcinogenic health effects) and slope factors and unit risk factors (to assess carcinogenic risk) typically used in the quantification of human health risks.





TABLE 8-9 Non-Carcinogenic Health Effects of Chemicals of Potential Concern Human Health Evaluation 1132 and 1146 Seneca Street, Buffalo, New York

| Chemical of Potential Concern | CAS # | Non-Carcinogenic Oral Critical Effect | Non-Carcinogenic Inhalation Critical Effect |
|----------------------------------|-----------|--|---|
| Volatile Organic Compounds | | l. | l. |
| Acetone | 67-64-1 | Nephropathy | |
| Benzene | 71-43-2 | Decreased lymphocyte count | Decreased lymphocyte count |
| 1,3-Butadiene | 106-99-0 | | Ovarian atrophy |
| Carbon disulfide | 75-15-0 | Fetal toxicity/malformations | Peripheral nervous system dysfunction |
| Chloromethane (methyl chloride) | 74-87-3 | | Cerebellar lesions |
| Cyclohexane | 110-82-7 | | Reduced pup weights in the F1 and F2 generations |
| Dichlorodifluoromethane | 75-71-8 | Reduced body weight | |
| Ethylbenzene | 100-41-4 | Liver and kidney toxicity | Developmental toxicity |
| n-Heptane | 142-82-5 | | |
| n-Hexane | 110-54-3 | | Peripheral neuropathy (decreased motor nerve conduction velocity at 12 weeks) |
| Isopropylbenzene (cumene) | 98-82-8 | Increased average kidney weight in female rats | Increased kidney weights in female rats and adrenal weights in male and female rats |
| Methylcyclohexane | 108-87-2 | | |
| Methylene chloride | 75-09-2 | Liver toxicity | |
| Methyl ethyl ketone (2-butanone) | 78-93-3 | Decreased pup body weight | Developmental toxicity (skeletal variations) |
| Styrene | 100-42-5 | Red blood cell and liver effects | CNS effects |
| Toluene | 108-88-3 | Increased kidney weight | Neurological effects in occupationally-exposed workers |
| 1,2,4-Trichlorobenzene | 120-82-1 | Increased adrenal weights; vacuolization of zona fasciculata in the cortex | |
| 1,1,1-Trichloroethane | 71-55-6 | Reduced body weight | Liver histopathologic changes |
| Trichlorofluoromethane | 75-69-4 | Survival and histopathology | |
| 1,2,4-Trimethylbenzene | 95-63-6 | | |
| 1,3,5-Trimethylbenzene | 108-67-8 | | |
| Xylenes, total | 1330-20-7 | Decreased body weight, increased mortality | Impaired motor coordination (decreased rotarod performance) |
| Semi-Volatile Organic Compounds | | | |
| Acetophenone | 98-86-2 | General toxicity | |
| Benzaldehyde | 100-52-7 | Forestomach lesions, kidney toxicity | |
| Benzo(a)anthracene | 56-55-3 | | |
| Benzo(a)pyrene | 50-32-8 | | |
| Benzo(b)fluoranthene | 205-99-2 | | |
| Benzo(g,h,i)perylene | 191-24-2 | | |
| Benzo(k)fluoranthene | 208-08-9 | | |
| 1,1-Biphenyl | 92-52-4 | Kidney damage | |
| Carbazole | 86-74-8 | | |
| Chrysene | 218-01-9 | | |
| bis(2-Ethylhexyl)phthalate | 117-81-7 | Increased relative liver weight | |
| Indeno(1,2,3-cd)pyrene | 193-39-5 | | |
| 2-Methylnaphthalene | 91-57-6 | Pulmonary alveolar proteinosis | |
| Phenol | 108-95-2 | Decreased maternal weight gain | |
| Polychlorinated biphenyls | | | • |
| PCBs, total | 1336-36-3 | | |
| Metals | | • | • |
| Aluminum | 121-82-4 | Body weight and clinical parameters | |
| Cobalt | 7440-48-4 | | |
| Manganese | 7439-96-5 | Central nervous system effects (other effect: Impairment of neurobehavioral function) | Impairment of neurobehavioral function |
| Thallium | 7446-18-6 | | |
| Vanadium | 7440-62-2 | | |

Notes

Source: United States Environmental Protection Agency, Integrated Risk Information System (Accessed at: www.epa.gov/iris)

TABLE 8-10 Carcinogenic Health Effects of Chemicals of Potential Concern Human Health Evaluation 1132 and 1146 Seneca Street, Buffalo, New York

| Chemical of Potential Concern | CAS # | Oral Carcinogenic Effect | Inhalation Carcinogenic Effect | USEPA Weight of Evidence Classification ¹ | |
|----------------------------------|-----------|---|--|---|--|
| Volatile Organic Compounds | | <u>.</u> | | | |
| Acetone | 67-64-1 | | | Data are inadequate | |
| Benzene | 71-43-2 | Tumor type: leukemia | Tumor type: leukemia | A; Known/likely human carcinogen | |
| 1,3-Butadiene | 106-99-0 | | Tumor type: leukemia | Carcinogenic to humans | |
| Carbon disulfide | 75-15-0 | | | | |
| Chloromethane (methyl chloride) | 74-87-3 | | | D; Carcinogenic potential cannot be determined | |
| Cyclohexane | 110-82-7 | | | Data are inadequate | |
| Dichlorodifluoromethane | 75-71-8 | | | | |
| Ethylbenzene | 100-41-4 | | | D | |
| n-Heptane | 142-82-5 | | | D | |
| n-Hexane | 110-54-3 | | | | |
| Isopropylbenzene (cumene) | 98-82-8 | | | D; Carcinogenic potential cannot be determined | |
| Methylcyclohexane | 108-87-2 | | | | |
| Methylene chloride | 75-09-2 | Tumor type: hepatocellular adenomas or carcinomas and hepatocellular cancer and neoplastic nodules | Tumpr type: combined adenomas and carcinomas | B2 | |
| Methyl ethyl ketone (2-butanone) | 78-93-3 | | | Data are inadequate | |
| Styrene | 100-42-5 | | | | |
| Toluene | 108-88-3 | | | | |
| 1,2,4-Trichlorobenzene | 120-82-1 | | | D | |
| 1,1,1-Trichloroethane | 71-55-6 | | | | |
| Trichlorofluoromethane | 75-69-4 | | | | |
| 1,2,4-Trimethylbenzene | 95-63-6 | | | | |
| 1,3,5-Trimethylbenzene | 108-67-8 | | | | |
| Xylenes, total | 1330-20-7 | | | Data are inadequate | |
| Semi-Volatile Organic Compounds | | • | | | |
| Acetophenone | 98-86-2 | | | D | |
| Benzaldehyde | 100-52-7 | | | | |
| Benzo(a)anthracene | 56-55-3 | | | B2 | |
| Benzo(a)pyrene | 50-32-8 | Tumor type: forestomach, squamous cell papillomas and carcinomas; forestomach, larynx and esophagus, papillomas and carcinomas (combined) | - | B2 | |
| Benzo(b)fluoranthene | 205-99-2 | | - | B2 | |
| Benzo(g,h,i)perylene | 191-24-2 | | | D | |
| Benzo(k)fluoranthene | 208-08-9 | | | B2 | |
| 1,1-Biphenyl | 92-52-4 | | | | |
| Carbazole | 86-74-8 | | | | |
| Chrysene | 218-01-9 | | | B2 | |
| bis(2-Ethylhexyl)phthalate | 117-81-7 | Tumor type: hepatocellular carcinoma and adenoma | | B2 | |
| Indeno(1,2,3-cd)pyrene | 193-39-5 | | | B2 | |
| 2-Methylnaphthalene | 91-57-6 | | | Data are inadequate | |
| Phenol | 108-95-2 | | | D | |
| Polychlorinated biphenyls | | | | | |
| PCBs, total | 1336-36-3 | Tumor type: liver hepatocellular adenomas, carcinomas, cholangiomas, or cholangiocarcinomas | Tumor type: liver hepatocellular adenomas, carcinomas, cholangiomas, or cholangiocarcinomas | B2 | |
| Metals | | | | | |
| Aluminum | 121-82-4 | | | | |
| Cobalt | 7440-48-4 | | | | |
| Manganese | 7439-96-5 | | | D | |
| Thallium | 7446-18-6 | | | | |
| Vanadium | 7440-62-2 | | | | |

Notes

Source: United States Environmental Protection Agency, Integrated Risk Information System (Accessed at: www.epa.gov/iris)

(1) USEPA Weight-of-Evidence Classifications: A - Human carcinogen

B1 - Probable human carcinogen; limited human data are available

B2 - Probable human carcinogen; sufficient evidence in animals and inadequate or no evidence in humans

C - Possible human carcinogen

D - Not classifiable as to human carcinogenicity

-- Not Evaluated

8.6. Risk Characterization

Based on current Site conditions, observations, and the anticipated future use of the Site, the potential for human exposure to COPCs and resultant adverse health effects are discussed for each receptor population below. Table 8-11 provides a summary of the human health risk characterization.

8.6.1. Current/Future Land Use Scenario

The potential for exposure to COPCs via the pathways described in the Exposure Assessment is discussed for trespassers in the current/future land use scenario, under the assumption there will be no further remediation at the Site. In this section, the potential for exposure is classified as "Not Expected", "Possible", or "Likely" based on current/future Site conditions and surrounding land use.

Trespassers

Dermal contact with and incidental ingestion and inhalation of COPCs in surface soil/fill:

The Site is composed of a currently vacant former industrial building, paved driveways, and vacant land on the 1132 property and vacant land on the adjacent 1146 property located in a mixed commercial/light industrial and residential area in Buffalo. There are access restrictions that would deter potential trespassers, such as the chain-link fence along the southern, eastern, and western sides of the Site and along the northern side of the 1132 property. In addition, overgrown vegetation impedes access from the northern side of the 1146 property. It is not expected that trespassers would obtain access to the inside of the former industrial building.

Exposure of trespassers to COPCs in surface soil/fill via incidental ingestion of and dermal contact with the soil/fill and/or inhalation of volatiles and/or particulates released from the soil/fill, is possible. This includes COPCs in surface soil/fill across the Site and PCBs in soil/fill to the north, west, and east of the former industrial building.

However, these exposure pathways are limited to those areas of the Site not covered by the former manufacturing building footprint (1132 Seneca Street) or other impervious surfaces and are mitigated by the fact that the vacant property (1146 Seneca Street) is covered with vegetation, which limits soil disturbance. In addition, under the future land use scenario, it is anticipated the majority of the Site will be covered with impervious surfaces (e.g., buildings or asphalt-paved parking lots).

PCBs is the predominant COPC in shallow soil/fill based on comparison of the soil/fill data to the NYSDEC BCP's SCO for restricted-industrial use. The other chemical selected as a COPC based on comparison to an SCO is benzo(a)pyrene, a polycyclic





TABLE 8-11Summary of Human Health Risk CharacterizationHuman Health Evaluation1132 and 1146 Seneca Street, Buffalo, New York

| Scenario | Receptor Population | Exposure Medium | | | | Likelih | Likelihood of Exposure ¹ | | |
|----------------|---------------------------------|------------------------------------|---------------------------|-------------------|--------------|----------|-------------------------------------|---|--|
| Timeframe | | | Exposure Routes Evaluated | | Not Expected | Possible | Likely | | |
| Current/Future | Trespasser | Site-wide Surface Soil/Fill | Ingestion | Dermal Contact | Inhalation | | х | | |
| | | Loading Dock IRM Area Soil/Fill | Ingestion | Dermal Contact | Inhalation | х | | | |
| | | Pre-Characterization Soil/Fill | Ingestion | Dermal Contact | Inhalation | | х | | |
| Future | Construction Worker | Site-wide Surface Soil/Fill | Ingestion | Dermal Contact | Inhalation | | | Х | |
| | | Site-wide Subsurface Soil/Fill | Ingestion | Dermal Contact | Inhalation | | х | | |
| | | Loading Dock IRM Area Soil/Fill | Ingestion | Dermal Contact | Inhalation | | | Х | |
| | | Pre-Characterization Soil/Fill | Ingestion | Dermal Contact | Inhalation | | | Х | |
| | | Groundwater | N/A | Dermal Contact | Inhalation | х | | | |
| | Construction/Utility Worker | Site-wide Surface Soil/Fill | Ingestion | Dermal Contact | Inhalation | | | Х | |
| | | Site-wide Subsurface Soil/Fill | Ingestion | Dermal Contact | Inhalation | | | Х | |
| | | Loading Dock IRM Area Soil/Fill | Ingestion | Dermal Contact | Inhalation | | | Х | |
| | | Pre-Characterization Soil/Fill | Ingestion | Dermal Contact | Inhalation | | | Х | |
| | | Groundwater | N/A | Dermal Contact | Inhalation | | Х | | |
| | Indoor Site Worker / Visitor | Site-wide Surface Soil/Fill | Ingestion | Dermal Contact | Inhalation | х | | | |
| | | Loading Dock IRM Area Soil/Fill | Ingestion | Dermal Contact | Inhalation | | х | | |
| | | Indoor Air | N/A | N/A | Inhalation | | х | | |

Notes

N/A = Not Applicable

(1) The likelihood of exposure does not equate to the potential for adverse human health effects from such exposure. See the Risk Characterization section of text for additional discussion specific to each human receptor population.

aromatic hydrocarbon (PAH) that is ubiquitous in the environment. Seven of the nine organic COPCs and all three of the inorganic COPCs were selected based on the lack of chemical-specific SCOs. USEPA RSLs were available for seven of these ten chemicals, however, and their maximum detected concentrations were orders of magnitude less than the corresponding USEPA RSLs. The exposure duration would be limited to the trespassing period.

8.6.2. Future Land Use Scenario

The potential for exposure to COPCs via the pathways described in the Exposure Assessment is discussed for human receptors in the future scenario, under the assumption of Site redevelopment but no further Site remediation. In this section, the potential for exposure is classified as "Not Expected", "Possible", or "Likely" based on anticipated future conditions and surrounding land use.

Construction Workers

Dermal contact with and incidental ingestion and inhalation of COPCs in surface soil/fill:

It is assumed that the volunteer will redevelop the Site as an expansion to their current business. Therefore, exposure of construction workers to COPCs in surface soil/fill, via incidental ingestion of and dermal contact with the soil/fill and/or inhalation of volatiles and/or particulates released from the soil/fill, during future construction work is likely. This includes COPCs in surface soil/fill across the Site, PCBs in soil/fill to the north, west, and east of the former industrial building, and PCBs in the exposed excavation at the loading dock IRM Area.

PCBs is the predominant COPC in shallow soil/fill based on comparison of the soil/fill data to the NYSDEC BCP's SCO for restricted-industrial use. The other chemical selected as a COPC based on comparison to an SCO is benzo(a)pyrene, a polycyclic aromatic hydrocarbon (PAH) that is ubiquitous in the environment. Seven of the nine organic COPCs and all three of the inorganic COPCs were selected based on the lack of chemical-specific SCOs. USEPA RSLs were available for seven of these ten chemicals and their maximum detected concentrations were orders of magnitude less than the corresponding RSLs. The exposure duration would be limited to the period of Site redevelopment.

Dermal contact with and incidental ingestion and inhalation of COPCs in subsurface soil/fill:

Although new construction (e.g., involving subsurface intrusion for footings) is not anticipated at this time, some disturbance to subsurface soil/fill during future redevelopment activities at the Site may occur. Exposure of construction workers to





COPCs in subsurface soil/fill, via incidental ingestion of and dermal contact with soil and/or inhalation of volatiles and/or particulates released from the soil, during future construction work is therefore possible.

However, there is little potential for adverse human health effects from such exposure. The exposure duration would be limited to the period of Site redevelopment. The only COPCs in subsurface soil/fill were one VOC and three metals that were selected based on the lack of chemical-specific SCOs. USEPA RSLs were available for the three metals, and their maximum detected concentrations were orders of magnitude less than the corresponding RSLs.

Construction/Utility Workers

Dermal contact with and incidental ingestion and inhalation of COPCs in surface soil/fill:

The Site has access to a public potable water supply and underground utilities are likely present on the Site. It is assumed that the volunteer will redevelop the Site as an expansion to their current business. Therefore, exposure of construction/utility workers to COPCs in surface soil/fill, via incidental ingestion of and dermal contact with soil and/or inhalation of volatile and/or particulates released from surface soil/fill, during future construction/utility work is likely. This includes COPCs in surface soil/fill across the Site, PCBs in soil/fill to the north, west, and east of the former industrial building, and PCBs in the exposed excavation at the loading dock IRM Area.

PCBs is the predominant COPC in shallow soil/fill based on comparison of the soil/fill data to the NYSDEC BCP's SCO for restricted-industrial use. The other chemical selected as a COPC based on comparison to an SCO is benzo(a)pyrene, a polycyclic aromatic hydrocarbon (PAH) that is ubiquitous in the environment. Seven of the nine organic COPCs and all three of the inorganic COPCs were selected based on the lack of chemical-specific SCOs. USEPA RSLs are available for seven of these ten chemicals and their maximum detected concentrations are orders of magnitude less than the corresponding RSLs. The exposure duration would be limited to the period of Site redevelopment.

Dermal contact with and incidental ingestion and inhalation of COPCs in subsurface soil/fill:

Future construction/utility work would most likely necessitate intrusion to the subsurface soil/fill. Therefore, exposure of construction/utility workers to COPCs in subsurface soil/fill, via incidental ingestion of and dermal contact with the soil/fill and/or inhalation of volatiles and/or particulates released from the soil/fill, is likely.





However, there is little potential for adverse human health effects from such exposure. The only COPCs in subsurface soil/fill were one VOC and three metals that were selected based on the lack of chemical-specific SCOs. USEPA RSLs were available for the three metals, and their maximum detected concentrations were orders of magnitude less than the corresponding RSLs. The exposure duration would be limited to the period of Site redevelopment.

Dermal contact with and inhalation of COPCs in shallow groundwater:

Depth to groundwater on the Site has been measured as 0.1 to 4.1 feet bgs. In the event future construction/utility work necessitates intrusion to the subsurface soil/fill, shallow groundwater may pool in the bottom of an excavation (e.g., a trench). Exposure of construction/utility workers to COPCs in shallow groundwater, via dermal contact and/or inhalation of volatiles, is possible.

However, there is little potential for adverse human health effects from such exposure. The COPCs in shallow groundwater were selected by comparison to the NYSDEC Class GA standards and guidance values, which are protective of drinking water. While the maximum detected concentrations of a few chemicals (i.e., six PAHs, phenol, and manganese) are greater than these screening criteria, the comparison presented herein overstates the potential for adverse human health effects following direct contact exposure to COPCs in shallow groundwater, as is assumed in this exposure scenario. Six of the thirteen organic chemicals and three of the four metals were identified as COPCs based on the lack of chemical-specific Class GA standards and guidance values. USEPA RSLs for tapwater are available for seven of these nine chemicals and their maximum detected concentrations are less than the corresponding RSLs. The exposure duration would be limited to the period of work.

Indoor Site Workers/Visitors

Dermal contact with and incidental ingestion and inhalation of PCBs in soil/fill in the exposed excavation at the Loading Dock IRM area (IRM1)

In the absence of further remediation, exposure of indoor Site workers to PCBs in soil/fill in the exposed excavation during work activities in the area, via incidental ingestion of and dermal contact with the soil/fill and/or inhalation of particulates released from the soil/fill, is possible.

Inhalation of VOCs that migrate from sub-slab soil vapor to indoor air of the existing former industrial building and/or future buildings that may be constructed on the Site:

Since COPCs were selected in sub-slab soil vapor from under the concrete floor slab foundation in the former industrial building, albeit due to the lack of NYSDOH screening





criteria, inhalation exposure of indoor Site workers/visitors to the COPCs in indoor air from sub-slab vapor intrusion is possible.

However, based on the conservative comparison of the sub-slab soil vapor data to the available NYSDOH criteria for indoor air and the USEPA RSLs for industrial air, the COPCs in sub-slab soil vapor are unlikely to pose exposure or health hazards to indoor Site workers/visitors. With three exceptions, all of the detected chemical concentrations in sub-slab soil vapor are less than the corresponding screening levels for ambient air. The maximum detected concentrations of the other three chemicals are less than an order of magnitude greater than the corresponding screening levels for indoor air such that the concrete floor slab foundation in the existing building and the foundation in future buildings should mitigate the potential for vapor intrusion.

8.7. Uncertainty Analysis

Uncertainty is inherent in the process of conducting human health evaluations. In qualitative evaluations, sampling and analysis data, information and assumptions regarding the likelihood, frequency, and magnitude of exposure, and information on the toxicity of the detected chemicals are used to infer the potential for exposure and health risk. By design, the evaluations rely on simple and conservative assumptions with the sole intent of identifying and eliminating from concern those scenarios that are unlikely to result in exposure and health risk and highlighting those scenarios that, depending on actual circumstances, may result in exposure and risk. Uncertainty is associated with each component of this process, the sum of which could alter the conclusions regarding the likelihood of exposure and health risk for any given receptor population.

8.7.1. Sampling and Analysis

Uncertainty associated with environmental sampling is generally related to the limitations of the sampling in terms of the number and distribution of samples, while uncertainty associated with the sample analysis is generally associated with systematic or random errors (e.g., false positive or false negative results). Thus, the potential for exposure may be overstated or understated depending on how well each environmental medium was characterized.

8.7.2. Exposure Assessment

Aspects of the human exposure assessment generally result in overstatement of the potential for long-term exposure. In addition, the release mechanisms for COPCs may have been overstated.

8.7.3. Toxicological/Screening Criteria

Screening criteria were not available for all chemicals that were detected in samples collected at the Site. As such, the potential for adverse health effects as a result of





potential exposure to those chemicals is uncertain. In addition, in most cases, the critical effects listed for the COPC are for laboratory animals. Differences in toxicity may exist between laboratory animals and humans.

8.8. Summary

The current/future scenario evaluated the potential for human exposure to COPCs at the Site, given the current vacancy of the Site and the anticipated future use of the Site for light industrial use, assuming no further Site remediation. The future scenario evaluated the potential for exposure of additional future human receptor populations to COPCs at the Site, given the anticipated future use of the Site and assuming no further Site remediation. The following presents a summary of the results of the HHE.

8.8.1. Current/Future Scenario

Based on the current and assumed future use of the Site, the potential for trespasser exposure to COPCs in surface soil/fill, via incidental ingestion, dermal contact, and/or inhalation of particulates, is possible. This includes COPCs in surface soil/fill across the Site and PCBs in soil/fill to the north, west, and east of the former industrial building.

However, these exposure pathways are limited to those areas of the Site not covered by the former manufacturing building footprint or other impervious surfaces (1132 Seneca Street) and are mitigated by the fact that the vacant property (1146 Seneca Street) is covered with vegetation, which limits soil disturbance. In addition, under the future land use scenario, it is anticipated the majority of the Site will be covered with impervious surfaces (e.g., buildings or asphalt-paved parking lots). PCBs is the predominant COPC in shallow soil/fill based on comparison of the soil/fill data to the NYSDEC BCP's SCO for restricted-industrial use

8.8.2. Future Scenario

For the purposes of this HHE, it is assumed that the volunteer will redevelop the Site as an expansion to their current business. Potential additional human receptors under the future exposure scenario include construction workers, construction/utility workers, and indoor Site workers/visitors.

Exposure of construction workers and construction/utility workers to COPCs in surface soil/fill at the Site is likely. This includes COPCs in surface soil/fill across the Site, PCBs in soil/fill to the north, west, and east of the former industrial building, and PCBs in the exposed excavation at the loading dock IRM Area. PCBs is the predominant COPC in shallow soil/fill based on comparison of the soil/fill data to the NYSDEC BCP's SCO for restricted-industrial use. The exposure duration would be limited to the period of Site redevelopment.





Exposure of construction workers and construction/utility workers to COPCs in subsurface soil/fill at the Site is possible and likely, respectively. However, there is little potential for adverse human health effects from such exposure. The only COPCs in subsurface soil/fill were one VOC and three metals that were selected based on the lack of chemical-specific SCOs. USEPA RSLs were available for the three metals, and their maximum detected concentrations were orders of magnitude less than the corresponding RSLs. The exposure duration would be limited to the period of Site redevelopment.

Exposure of construction/utility workers to COPCs in shallow groundwater at the Site is possible. In the event that future construction/utility work necessitates intrusion into the subsurface soil, shallow groundwater may infiltrate the bottom of an excavation. However, there is little potential for adverse human health effects from such exposure. The COPCs were selected by comparison to NYSDEC Class GA standards and guidance values protective of drinking water which overstates the potential for adverse human health effects following direct contact exposure to COPCs in shallow groundwater, as is assumed in this exposure scenario. The exposure duration would be limited to the period of work.

Exposure of indoor Site workers to PCBs in soil/fill in the exposed excavation at the loading dock IRM area (IRM1) during work in the area is possible.

Since COPCs were selected in sub-slab soil vapor from under the concrete floor slab foundation in the former industrial building, albeit due to the lack of NYSDOH screening criteria, inhalation exposure of indoor Site workers/visitors to the COPCs in indoor air from sub-slab vapor intrusion is possible.

However, based on the conservative comparison of the sub-slab soil vapor data to the available NYSDOH criteria for indoor air and the USEPA RSLs for industrial air, the COPCs in sub-slab soil vapor are unlikely to pose exposure or health hazards to indoor Site workers/visitors. The concrete floor slab foundation in the existing building and the foundation in future buildings should mitigate the potential for vapor intrusion.





9.1. Conclusions

The Remedial Investigation of the 1132-1146 Seneca Street Site provided an environmental characterization of on-Site surface and subsurface soil/fill, groundwater, and sub-slab soil vapor sufficient to evaluate potential impacts to human health and the environment. A summary of the conclusions drawn for the data presented in this report is provided below by medium evaluated:

9.1.1. Soil/Fill Material

Evaluation of analytical results for surface and subsurface soil/fill samples identified elevated concentrations of PCBs on the 1122 and 1132 Seneca street properties and benzo(a)pyrene on the 1146 Seneca Street property in surface soil. Based on samples collected from the native silty clay as part of the two IRMs completed, these elevated concentrations may be limited to the soil/fill material above the underlying, relatively less permeable, native silty clay. Also, sediment samples collected from an interior floor drain/pipe chase in the former manufacturing building also contained elevated PCBs. As shown on Table 7-4 and Figure 7-3, highest concentrations of PCBs are present in the upper six inches of the soil/fill and in the floor drain sediment

One carcinogenic PAH compound (benzo(a) pyrene) was detected in surface soil (0 to 2" depth) on the 1146 Seneca property at concentrations that exceed the NYS Restricted Industrial SCO. Based on the analytical results, surface soils containing BAP at concentrations above the industrial SCO of 1.1 mg/kg will be removed and disposed off-site at a DEC-permitted waste disposal facility. VOCs were not detected in the soil/fill samples at concentrations above NYS SCOs for restricted commercial or industrial use.

The deepest samples in which constituent concentrations were greater than the Restricted Industrial SCOs were collected at the 0.5 to 2.0 feet depth. These samples represent the deepest depth at which contamination of concern was found and are within the soil/fill material, above the native silty clay.

9.1.2. Groundwater

Slightly elevated concentrations of two SVOCs and three common metals were identified in the groundwater samples collected during the RI. VOCs and PCBs were not present in groundwater samples at concentrations above GW standards.





The groundwater in the on-Site overburden is perched on the native silty clay, discontinuous across the Site, and ephemeral based on seasonal and periodic precipitation and snow melt events.

Although the on-Site overburden groundwater is not used for human consumption or for any other purpose, the shallow depth of the overburden groundwater, when present, could allow for direct contact with the groundwater during planned redevelopment activities. Such contact would be limited to the times during which excavations are performed.

9.1.3. Soil Vapor

VOC concentrations detected in sub-slab soil vapor samples collected at the Site are all very low and for the few compounds that were detected that have NYSDOH guidance criteria, those concentrations were below the criteria at which further action would be recommended.

9.2. Recommendations

The recommendations described below are based on the inherent directive of the NYS Brownfield Cleanup Program that mandates the implementation of remedial actions designed to return properties within the BCP to a status that is protective of Human Health and the Environment. Results of this and previous environmental studies at the Site confirm that the 1132-1146 Seneca Street Site is suitable for re-development for new industrial use provided that certain remedial actions and precautions are taken to limit exposure to PCBs and other contaminants in the soil/fill material and groundwater. Recommendations include:

- Removal of the UST Remove the UST that was encountered outside and near the entrance to the former rail loading dock on the 1132 Seneca Street property.
- Removal of PCB-Impacted Soil Fill Removal and off-Site disposal of PCBimpacted soil/fill is recommended for the soil/fill that is identified as containing PCBs at concentrations above the SCO for restricted industrial use (25 PPM). These were delineated and found to be limited to the 1122 and 1132 Seneca Street properties.
- Removal of benzo(a)pyrene-impacted Surface Soils- Removal and off-Site disposal of BAP-impacted surface soil(upper 2") is recommended for the soil/fill that is identified as containing BAP at concentrations above the SCO for restricted industrial use (1.1 mg/kg). These were determined to be limited to surface soils of the 1146 Seneca Street property.
- Confirmatory Sampling Subsequent to UST removal and excavation and disposal of the PCB -impacted soil/fill materials, post-excavation confirmatory soil will be collected for PCB (and organics in the case of the UST) analysis prior to backfilling with documented clean soil.





Removal of PCB-Containing Floor Drain Sediment - Sediments found to contain elevated PCBs located in a floor drain (pipe chase) in the floor of the 1132 Building should be properly removed and disposed off-Site at a permitted waste disposal facility.

Depending on the results of post excavation sampling, the following potential precautions may be warranted during and subsequent to Site redevelopment:

- Establishment of health and safety protocols for specific tank removal, excavation and re-development activities to minimize exposure to potential contaminants.
- Development of a Site Management Plan (SMP) of which will contain three main parts as follows:
 - Environmental Easement which details site-specific restrictions and requirements.
 - ExcavationWork Plan for dealing with excavated fill material as well as for the likely event that groundwater is encountered during development activities and when digging as required for maintenance of buried utilities following completion of Site redevelopment. The Excavation Work Plan should include health and safety requirements and excavated soil and/or groundwater handling/disposal requirements.
 - Periodic Review Report which details requirements for regular site inspection/reviews and certification of institutional controls.
- Placement of Site and groundwater use restrictions to prevent higher Site uses and human consumption of the on-Site groundwater.

As discussed in the qualitative human health evaluation in Section 8.0, implementation of these actions will be sufficient to protect human health and the environment.





10.1. Remedial Goals and Objectives

Phase II and Remedial investigations completed at the Site have sufficiently characterized the nature and extent of contamination present in on-Site environmental media for use in determining potential risks and remedial needs at the Site. Risk assessment conclusions derived from extensive analytical data from soil, air, and groundwater samples indicate that elevated levels of PCBs present in surface (upper 2-inches) and near-surface (≤ 2.0 feet) soil/fill are the primary potential health risk posed by environmental media at the Site and that these soil/fill warrant remedial action. Also, benzo(a)pyrene is present in surface soil at concentrations above the industrial soil cleanup objective at some locations on the 1146 Seneca Street property and will also be remediated. The discovery of a (water-filled) underground storage tank may pose potential environmental risk and therefore should be removed along with any associated impacted soil/fill, if present. Soil vapor and groundwater were determined not to be media of significant concern based on the lack of constituents and/or concentrations of concern and unlikely/limited exposure routes and duration.

10.1.1. Remedial Goals

The remedial goals for the Site are:

- 1. Elimination of potential threats to public health posed by on-Site PCB-impacted soil/fill located on the 1122 and 1132 properties.
- 2. Elimination of potential threats to public health posed by on-Site benzo(a)pyreneimpacted surface soil located on the 1146 Seneca Street property.
- 3. Elimination of potential threats to public health potentially posed by the underground storage tank (UST), located on the 1132 property, and related impacted soil/fill, if present.

10.1.2. Remedial Action Objectives

Based on the results of the Site characterizations and Qualitative Human Health Risk Assessment, PCB-impacted and benzo(a)pyrene-impacted soil/fill are the media of primary concern at the Site. The PCB-impacted soil/fill of concern is that which is located on the 1122 and 1132 properties at concentrations above 25 PPM (the restricted industrial SCO). No such PCB-impacted soil/fill was found on the 1146 property. The BAP-impacted soil are surface soils of the upper 2-inches located on some areas of the 1146 Seneca Street property, at concentrations above 1.1 mg/kg (the restricted industrial SCO). Also, potential petroleum-impacted soil/fill and/or impacted groundwater may be present in the immediate vicinity of the UST discovered on the 1132 property, near the rail loading dock.





The Remedial Action Objectives for the Site are:

- 1. To remove potential exposure risks associated with direct contact with soil/fill that has been significantly impacted by PCBs and BAP (i.e. concentrations above the industrial SCOs of 25 PPM and 1.1 mg/kg respectively).
- 2. To remove risks potentially associated with the contents of the UST and surrounding soil/fill that may have been impacted by the UST.

In order to achieve the RAOs, the PCB-impacted soil/fill material and BAP-impacted surface soil will be removed and properly disposed off-Site prior to Site re-development. The PCB excavations will be backfilled with documented clean soil. The UST and associated impacted soil/fill, if present, will be removed and backfilled with documented clean soil prior to Site redevelopment. Surface soil with elevated concentrations of BAP will be removed to a depth of a minimum of 3-inches and disposed off-Site at a DEC-permitted disposal facility.

10.1.3. Cleanup Tracks and SCGs

Since both remedial action objectives require the same basic remedy of removal and off-Site disposal, this remedy was evaluated under different cleanup track scenarios. Site cleanup Tracks 1, 2, and 4 were considered and evaluated for the remediation of the 1132-1146 Seneca Street BCP Site. The appropriate SCGs pertain only to soil/fill and are the New York State Soil Cleanup Objectives as provided in 6NYCRR Subpart 375-6.8(a) and (b).

10.2. Remedial Alternatives

Removal and off-Site Disposal of the PCB-impacted soil/fill, BAP-impacted surface soil and the UST is the focus of the remedial alternatives considered for the Site for the following reasons:

- The effectiveness of simple excavation/removal methods at eliminating the potential hazards posed by the contamination.
- The relative accessibility of the contamination in the upper two feet of soil/fill.
- The limited effectiveness of in-situ treatment technologies on PCBs because of their low volatility, recalcitrance in the environment, and resistance to chemical and biological breakdown.
- The desire to complete Site redevelopment during the year 2010.

Removal and off-Site disposal was evaluated under several different Cleanup Track scenarios which vary by cleanup levels and/or engineering controls. The following is a list of the five remedial alternatives evaluated for this Site:





- 1. **No Action** The No Action alternative assumes that no remedial action is taken and the Site is developed as planned but without removal of any of the PCB-impacted or BAP-impacted soil/fill or the UST and associated soil/fill.
- 2. **Track 1 Cleanup** Under a Track 1 cleanup, all on-Site soil/fill with constituents above unrestricted SCOs, including that which is beneath the large existing building, would be removed and replaced with documented clean soil.
- 3. **Track 2 Cleanup Commercial SCOs** Under a Track 2 Commercial cleanup, PCBs and other constituents present in soil/fill above restricted commercial SCOs would be removed and replaced with documented clean soil.
- 4. **Track 2 Cleanup Industrial SCOs -** Under a Track 2 Industrial cleanup, PCBs. BAP, and other constituents present in soil/fill above the restricted industrial SCOs would be removed and where necessary for redevelopment, replaced with documented clean soil.
- 5. Track 4 Cleanup Industrial SCOs Under a Track 4 Industrial cleanup, PCBs at hazardous levels (> 50 PPM) would be removed and replaced with documented clean soil and the entire Site covered with a protective cover system consisting of buildings, pavement, and/or one foot of vegetated clean soil. Figure 7-3 illustrates, in red, those areas that would be excavated and removed under this remedial alternative.

Each of these five remedial alternatives is described in more detail below.

10.2.1. Description of Remedial Alternatives

10.2.1.1. Alternative # 1- No Action

This alternative assumes that no remedial action is taken and the Site is developed as planned but without removal of any of impacted soil/fill or the UST and associated soil/fill. Since hazardous levels of PCBs are present in surface and near-surface soils, and BAP is present in surface soils at some locations on the 1146 Seneca Street property at concentrations above the industrial SCO, this alternative would not be protective of human health and would not be compliant with 6NYCRR Subpart 375-6. For this reason, this alternative was not considered further.

10.2.1.2. Alternative #2 - Track 1 Cleanup

Under a Track 1 cleanup, all on-Site soil/fill, including that which is beneath the existing warehouse building, would be removed and replaced with documented clean soil. Cleanup under Track 1 requires achieving unrestricted use soil cleanup objectives as specified in 6NYCRR Subpart 375-6.8(a), resulting in unrestricted Site use. Implementing the Track 1 alternative at this Site would involve removal of all on-Site soil/fill material from 1122, 1132, and 1146 Seneca Street properties to a minimum depth equivalent to the top of the native silty clay material. The remaining native silty clay soil would have to be verified through additional characterization and meet unrestricted





SCOs. Where necessary, backfill material would have to be documented clean soil per Appendix 5 of DER-10 (Nov 2009) <u>Allowable Constituent Levels for Imported Fill or Soil.</u>

A large volume of impacted soil/fill that would need to be removed and replaced by clean soil. The removal of the Soil/fill would be significantly complicated by the presence of the large former manufacturing building which covers much of the Site including some of the soil/fill that would need to be removed. This building is the main reason the applicant purchased the property and is undertaking the expense of Site remediation and redevelopment. If this building were required to be removed or significantly modified in order to remove the underlying soil/fill material the applicant would not be able to fund the remediation or Site redevelopment. The planned continued industrial use and industrial zoning of the Site makes cleanup of the Site under Track 1 overly conservative and unnecessary, impractical, and cost prohibitive. For these reasons, this alternative was not considered further.

10.2.1.3. Alternative #3 - Track 2 Cleanup – Commercial SCOs

Cleanup under Track 2 requires achieving the lowest of three applicable restricted use contaminant-specific soil cleanup objectives for all soils above bedrock as set forth in Section 375-6.4, (protection of public health), Section 375-6.5 (protection of groundwater), and Section 375-6.6 (protection of ecological resources). PCBs and other constituents coincident with those PCBs present in soil/fill of the 1122 and 1132 property above restricted commercial SCOs would be removed and replaced with documented clean soil. Also, surface soils containing BAP at concentrations above the industrial SCO would be removed from the 1146 Seneca Street property. This remedial option would include the removal of approximately 11,000 tons of PCB-impacted soil/fill from the 1122 and 1132 properties, including the UST and related soil/fill at an estimated cost of approximately \$1.2 million, as well as an estimated 1430 tons of PAH- impacted surface soil at a cost of \$70,000 Table 10-1. The removal of the PCB-impacted surface and subsurface soil/fill would include excavation, confirmation sampling, and backfilling with clean soil in accordance with DER-10 (DEC November 2009). This option would meet and exceed the remedial action objective and would include institutional controls of future Site use (industrial) and groundwater use. This alternative is analyzed further in Section 10.3.

10.2.1.4. Alternative # 4 - Track 2 Cleanup – Industrial SCOs

Under a Track 2 Industrial cleanup, PCBs and other constituents present in soil/fill above the restricted industrial SCOs would be removed and replaced with documented clean soil. Based on the known environmental conditions at the Site and the planned Site industrial use, Site cleanup under Track 2 can be achieved by the removal and off-Site disposal of PCB-impacted soil/fill to meet the restricted industrial SCO of 25 mg/kg and replacement with documented clean soil. The PCB-impacted soil/fill of concern is





Table 10-1

REMEDIAL COST ESTIMATE ALTERNATIVE 3

1132-1146 SENECA STREET SITE Buffalo, New York

| - | | | | | |
|----------|---|---|---------|-------------------|-------------|
| - | | | | UNIT PRICE MAT. & | |
| ITEM NO. | DESCRIPTION | ESTIMATED QUANTITY | UNIT | LABOR | EST. TOTAL |
| 1 | Remedial Contractor Mobilization and demobilization | 1 | sum | \$2,900 | \$2,900 |
| | Excavation water management/disposal and removal of Pipe Chase PCB sediments | 1 | sum | \$2,600 | |
| 3 | Removal and disposal of hazardous PCB soil/concrete | 700 | tons | \$144 | \$100,800 |
| | Removal and disposal of non-haz PCB soil/concrete (>1 < 50 PPM) ⁽¹⁾ | 10100 | tons | \$51 | \$515,100 |
| | Removal and disposal of non-haz PAH surface soil (upper 4") from 75% of 1146 Seneca St. | 1430 | tons | \$46 | \$65,780 |
| 5 | Removal and disposal of UST and related product/soils | 1 | sum | \$12,500 | \$12,500 |
| 6 | Backfill all PCB excavations with clean soil | 4100 | tons | \$21 | \$86,100 |
| | Total Remedial Contractor Costs before tax and contingency | al Remedial Contractor Costs before tax and contingency | | \$785,780 | |
| 7 | Sales tax on Remedial Contractor Costs | 0.0875 | | \$785,780.00 | \$68,756 |
| 8 | Side-wall/bottom confirmation samples (Pirnie's sub lab) 24 hr TAT | 110 | Samples | \$110.00 | \$12,100 |
| 9 | Engineering ⁽²⁾ | 1 | sum | \$30,000 | \$30,000 |
| | Sub-Total | | | | \$896,636 |
| 10 | Health & Safety (10%) | 10% of Subtotal | sum | | \$89,664 |
| 11 | Contingency | 30 % of subtotal | sum | | \$268,991 |
| | | | | | |
| | | | | | |
| | Total | | | | \$1,255,290 |

⁽¹⁾ Assumes minor non-PCB exceedances of commercial SCO in areas without PCB > 1PPM will be left in place.

⁽²⁾ Includes time and expenses for oversight of remedial contractor (4 hrs/day x 40 days), collection/coordination of confirmation samples and 10 hrs/week for 8 weeks for oversight of construction ops.

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located on the 1122 and 1132 Seneca properties. In addition, BAP-impacted surface soils would be removed from the upper 3-inches minimum and disposed off-Site at a DEC-permitted waste disposal facility. Figure 7-3 of the RI illustrates the areas planned for PCB-impacted soil/fill removal operations. Also, based on post-RI pre-characterization sampling, BAP-impacted surface soil will be removed from approximately 50% of the 1146 Seneca Street property. Figure 10-1A illustrates the areas that will require BAP removal. In addition, because of the presence of residual constituents of concern in the subsurface soil/fill of the 1146 Seneca property, land use and groundwater institutional controls would be implemented. These controls would include limiting future Site use to industrial and restricting the use of groundwater from beneath the Site without prior treatment and written permission of the Department.

To verify protection, any soil/fill materials encountered during redevelopment and determined to be significantly more contaminated than what has been previously characterized would be properly disposed off-Site. The SCOs will be used to assess soil/fill excavations or disturbances, define levels for the Site contaminants of concern, above which off-Site disposal will be required.

During clearing, grading, excavating, and stockpiling of excavated soil, dust suppression and air monitoring will be conducted in accordance with NYSDEC TAGM HWR-89-4031, Fugitive Dust Suppression and Particulate Monitoring Program at Inactive Hazardous Waste Sites.

Soil/fill material containing analytes above the SCOs will be further classified for disposal purposes with respect to hazardous characteristics, as outlined in 6 NYCRR Part 371, Identification and Listing of Hazardous Wastes. Soil/fill material determined to be a hazardous waste will be handled in accordance with the requirements of: 6 NYCRR Part 372, Hazardous Waste Manifest System and Related Standards for Generators, Transporters, and Facilities; and 49 CFR 107-171, DOT Rules for Hazardous Materials Transport.

This remedial option would include the removal of approximately 1500 tons of PCBimpacted soil/fill and an estimated 1000 tons of BAP-impacted surface soil at an estimated cost of approximately \$425,000, including the UST and related soil/fill, see Table 10-2. As part of the PCB-impacted soil/fill removal, excavation, confirmation sampling, and backfilling with clean soil would be performed in accordance with DER-10 (DEC November 2009). This option would meet the remedial action objective. This alternative is analyzed further in Section 10.3.

10.2.1.5. Alternative # 5 - Track 4 Cleanup – Industrial SCOs

Under a Track 4 Industrial cleanup, PCBs present in soil/fill above hazardous waste concentration (50 ppm) along with other constituents located coincidental with those





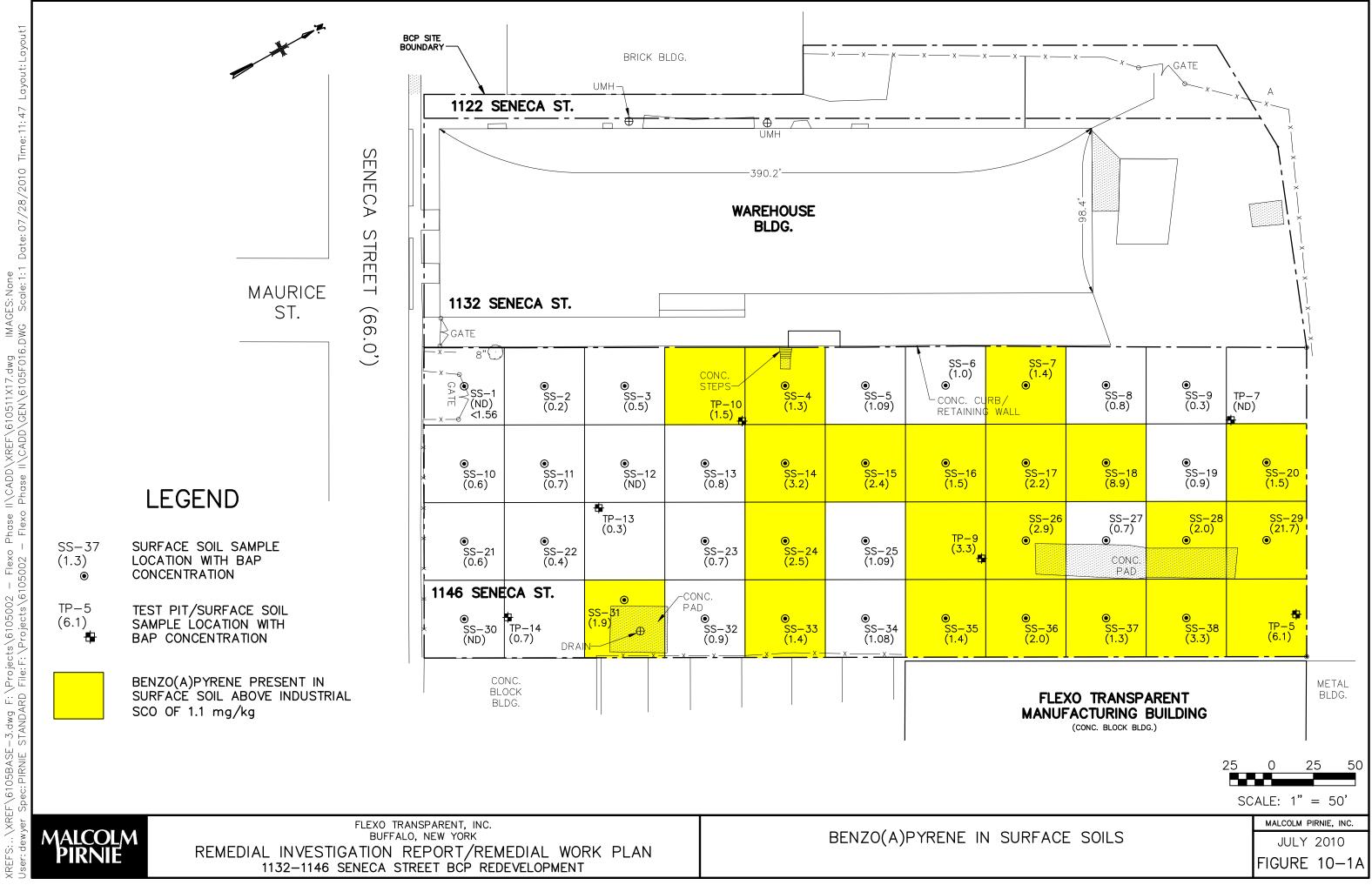




Table 10-2

REMEDIAL COST ESTIMATE ALTERNATIVE 4

1132-1146 SENECA STREET SITE Buffalo, New York

| | | | | UNIT PRICE MAT. & | |
|----------|---|--------------------|---------|-------------------|------------|
| ITEM NO. | DESCRIPTION | ESTIMATED QUANTITY | UNIT | LABOR | EST. TOTAL |
| | Remedial Contractor Mobilization and demobilization | 1 | sum | \$2,900 | |
| 2 | Excavation water management/disposal and removal of Pipe Chase PCB sediments | 1 | sum | \$2,600 | \$2,600 |
| 3 | Removal and disposal of hazardous PCB soil/concrete | 700 | tons | \$144 | \$100,800 |
| 4 | Removal and disposal of non-haz PCB soil/concrete (>25 < 50 PPM) | 800 | tons | \$51 | \$40,800 |
| 5 | Removal and disposal of UST and related product/soils | 1 | sum | \$12,500 | \$12,500 |
| | Backfill all excavations with clean soil | 1980 | tons | \$21 | \$41,580 |
| | Removal and disposal of BAP-impacted surface (0-4") soil from 50% of the 1146 Seneca Property | 1000 | tons | \$46 | \$46,000 |
| | Total Remedial Contractor Costs before tax and contingency | | | | \$247,180 |
| | Sales tax on Remedial Contractor Costs | 0.0875 | | \$247,180.00 | |
| | Side-wall/bottom confirmation samples (Pirnie's sub lab) 24 hr TAT | 70 | Samples | \$110.00 | \$7,700 |
| 10 | Engineering ⁽¹⁾ | 1 | sum | \$25,000 | \$25,000 |
| | Sub-Total | | | | \$301,508 |
| 11 | Health & Safety (10%) | 10% of Subtotal | sum | | \$30,151 |
| 12 | Contingency | 30 % of subtotal | sum | | \$90,452 |
| | | | | | |
| | | | | | |
| | Total | | | | \$422,112 |

⁽¹⁾ Includes time and expenses for oversight of remedial contractor (4 hrs/day x 25 days), collection/coordination of confirmations samples and 10 hrs/week for 8 weeks for oversight of construction ops.

. Prepared 070610 jjr elevated PCBs, would be removed and replaced with documented clean soil and the entire Site covered with a protective cover system consisting of buildings, pavement, and/or one foot of vegetated documented clean soil. Figure 7-3 illustrates, in red, those areas that would be excavated and removed under Alternative 5. Associated with a Site cover system would be required long-term Operations, Monitoring, and Maintenance (OM&M) and regular inspections and reporting on the condition of the cover system.

Details of the Site cover system would include:

- preparation of the Site surface/grading,
- specifications of thickness and type of pavement sub-base,
- thickness requirements of concrete and asphalt pavement,
- specifications of a demarcation mesh layer to be placed prior to placement of soil cover,
- specifications of thickness (1-foot) and type of acceptable clean soil cover,
- requirements for vegetative cover where clean soil is placed, including seed mixture specifications.

Also, included in this remedial alternative would be required excavation management practices per the Excavation Management Plan and the implementation of institutional controls of future industrial Site use and restriction on groundwater use.

The estimated cost of this alternative is approximately \$390,000 as detailed in Table 10-3. This alternative is analyzed with others in Section 10.3.

10.3. Alternative Analysis

10.3.1. Introduction

The following Sections present a detailed analysis of the three potentially viable remedial alternatives (Alternatives 3, 4, and 5) with respect to the evaluation criteria outlined in 6 NYCRR Part 375-1.10 and the RAOs for the Site.

10.3.2. Overall Protection of Public Health and the Environment

This threshold assessment addresses whether a remedy provides adequate protection and describes how risks posed through each pathway are eliminated, reduced, or controlled. This evaluation allows for consideration of whether the alternative poses any unacceptable short-term or cross-media impacts.

As determined by the Site-specific Qualitative Risk Assessment, Alternatives #3, 4, and 5 all provide adequate protection of public health and the environment and, therefore, achieve the RAOs for the Site. Alternatives #3 and #5 would be more protective than necessary relative to the future industrial use of the Site.





Table 10-3

REMEDIAL COST ESTIMATE ALTERNATIVE 5

1132-1146 SENECA STREET SITE Buffalo, New York

| | | | | UNIT PRICE MAT. & | |
|----------|--|--------------------|---------|-------------------|------------|
| ITEM NO. | DESCRIPTION | ESTIMATED QUANTITY | UNIT | LABOR | EST. TOTAL |
| | Remedial Contractor Mobilization and demobilization | 1 | sum | \$2,900 | |
| 2 | Excavation water management/disposal and removal of Pipe Chase PCB sediments | 1 | sum | \$2,600 | \$2,600 |
| 3 | Removal and disposal of hazardous PCB soil/concrete | 700 | tons | \$144 | \$100,800 |
| 5 | Removal and disposal of UST and related product/soils | 1 | sum | \$12,500 | \$12,500 |
| 6 | Backfill all PCB excavations with clean soil | 850 | tons | \$21 | \$17,850 |
| | Soil cover System (one foot clean soil over north end of 1146 Seneca) | 38000 | SF | \$1 | \$38,000 |
| | Annual Inspection and Certification of Site Cover System (per year) | 10 | year | \$4,500 | \$45,000 |
| | Total Remedial Contractor Costs before tax and contingency | | | | \$219,650 |
| | Sales tax on Remedial Contractor Costs | 0.0875 | | \$219,650.00 | |
| | Side-wall/bottom confirmation samples (Pirnie's sub lab) 24 hr TAT | 70 | Samples | \$110.00 | \$7,700 |
| 11 | Engineering ⁽¹⁾ | 1 | sum | \$30,000 | \$30,000 |
| | Sub-Total | | | | \$276,569 |
| 12 | Health & Safety (10%) | 10% of Subtotal | sum | | \$27,657 |
| 13 | Contingency | 30 % of subtotal | sum | | \$82,971 |
| | | | | | |
| | | | | | |
| | Total | | | | \$387,197 |

⁽¹⁾ Includes time and expenses for oversight of remedial contractor (4 hrs/day x 25 days), collection/coordination of confirmations samples and 10 hrs/week for 12 weeks for oversight of construction ops.

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Additionally, the Excavation Work Plan of the Site Management Plan will protect on-Site workers, the public, and the environment during Site redevelopment and future maintenance actions that would disturb the soil/fill material. The Excavation Work Plan also requires the off-Site disposal of soil/fill material determined to contain contaminant concentrations above restricted industrial SCOs if encountered.

10.3.3. Compliance with Standards, Criteria, and Guidance (SCGs)

A Site's remedial program must be designed so as to conform to standards and criteria that are generally applicable, consistently applied, and officially promulgated, that are either directly applicable, or that are not directly applicable but are relevant and appropriate, unless good cause exists why conformity should be dispensed with [6 NYCRR 375-1.0(c)(1)(i)].

Remedial Alternative #5 would fully comply with SCGs for the Site by removal of the most acutely contaminated soil/fill and placing a cover system over the entire Site to prevent contact with contaminants remaining on Site at concentrations below the industrial SCO.

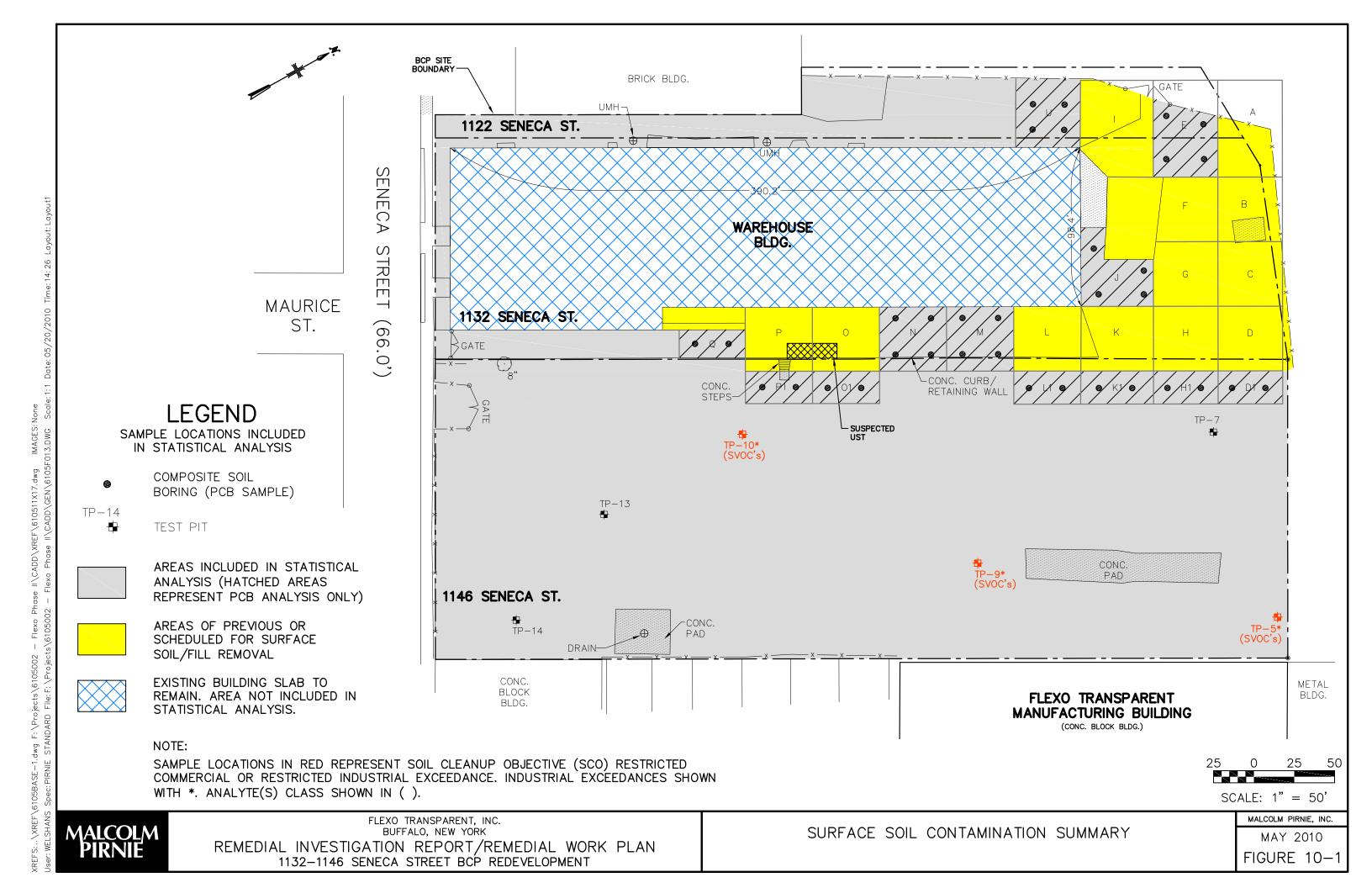
Alternatives #3 would not completely comply with the SCGs because of exceedances to SCGs on the 1146 property. These analytes include two PAHs, PCBs, and arsenic. However, these exceedances are very few of the 140 analytes tested, are present in the subsurface not at the surface and, were present, are below or only slightly above SCO levels. Tables 10-4 and 10-5 provide a summary of SCO exceedances in surface (0-2") and subsurface (>2" and <2') soil/fill samples and corresponding Figures 10-1, 10-1A and 10-2 illustrate the locations and concentrations of the samples which contained constituents above commercial and or industrial SCOs. Comparison of these two maps with Figure 8-2 which shows the planned Site development reveals that all but one of the SCO exceedances will be covered by some planned Site structure or paved surface. The single exception is this is the subsurface sample collected at Phase II boring B-3 which contained arsenic at 24 mg/kg, slightly above the commercial and industrial SCO of 16 mg/kg. Most other SCO exceedances were within the same order of magnitude of the SCOs and were located in areas that will be covered by planned Site structures or paved surfaces. See Figures 8-2, 10-1, 10-1A and 10-2.

10.3.4. Long-Term Effectiveness and Permanence

This criterion evaluates the long-term protection of human health and the environment at the completion of the remedial action. Effectiveness is assessed with respect to the magnitude of residual risks; adequacy of controls, if any, in managing treatment residuals or untreated wastes that remain at the Site; reliability of controls against possible failure; and potential to provide continued protection.







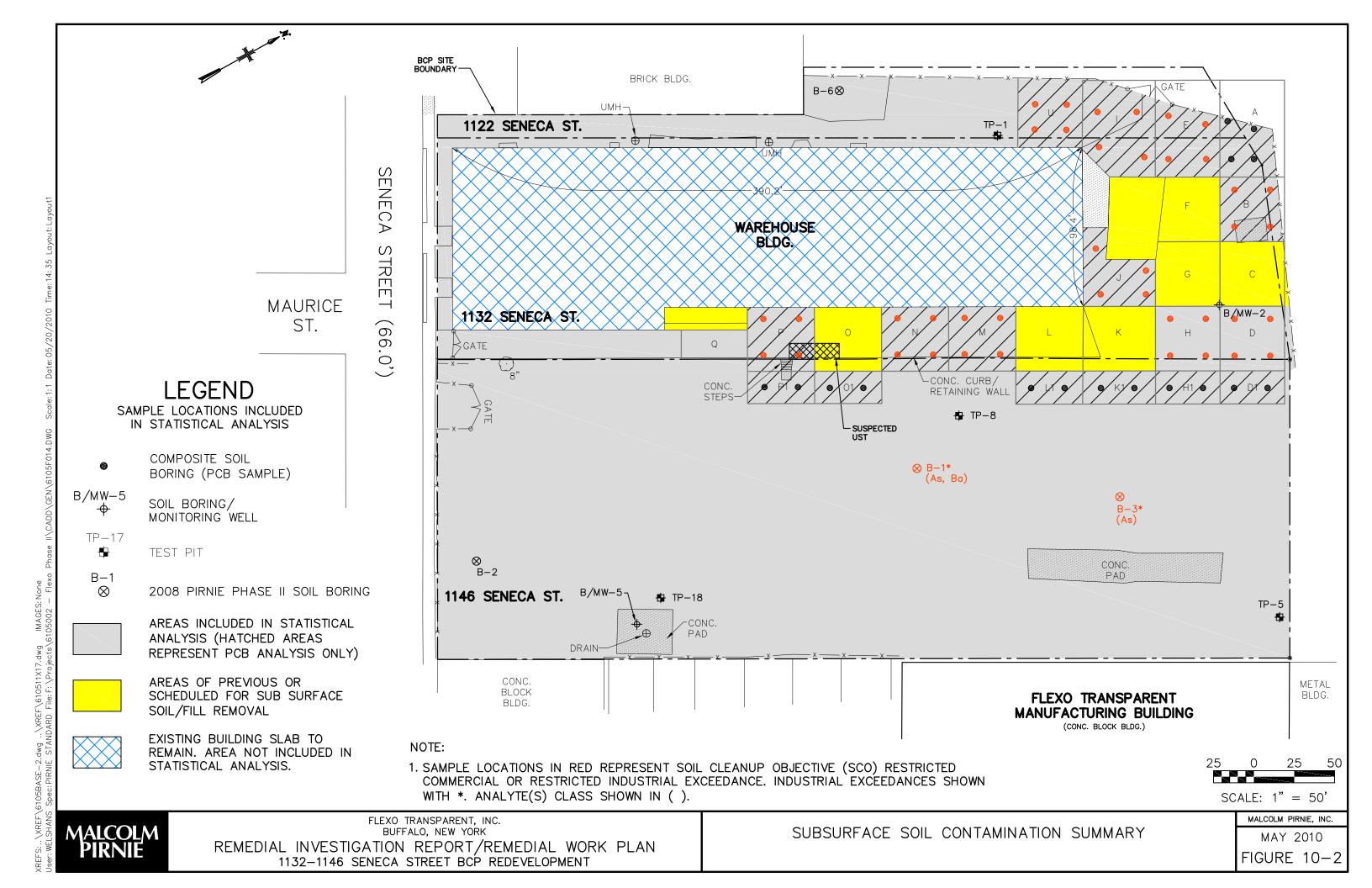




TABLE 10-4 Summary of Contamination Site-Wide Surface Soil¹ 1132-1146 Seneca Street Site Buffalo, NY

| Analyte ² | Number of Samples Analyzed ^{3,4} | Frequency of Detection | Range of Detection (µg/kg) | Maximum Concentration (µg/kg) | Average Concentration (µg/kg) Restricted Use Soil Cleanup Objectives - Commercial | | Restricted Use Soil Cleanup Objectives - Industrial | Frequency of Detections > SCO- Restricted Commercial | Frequency of Detections > SCO- Restricted Industrial | | |
|--------------------------|---|---------------------------|----------------------------------|-------------------------------------|---|-------|--|---|---|--|--|
| Semi-Volatiles Organic | c Compounds (µg/l | kg) | | | | | | | | | |
| Benzo(a)anthracene | 6 | 6 / 6 | 240 - 7,900 | 7,900 | 1,963 | 5,600 | 11,000 | 1 of 6 | 0 of 6 | | |
| Benzo(a)pyrene | 44 | 41/44 | 230 - 21,700 | 21,700 | 2,030 | 1,000 | 1,100 | 24/44 | 21/44 | | |
| Benzo(b)fluoranthene | 6 | 6 / 6 | 370 - 9,900 | 9,900 | 2,688 | 5,600 | 11,000 | 1 of 6 | 0 of 6 | | |
| PCB (µg/kg) | · | • | | · | • | | | | • | | |
| Total PCBs | 19 | 19 / 19 | 46 - 18,500 | 18,500 | 4,497 | 1,000 | 25,000 | 8 of 19 | 0 of 19 | | |
| Volatiles Organic Com | pounds (µg/kg) | • | | | | | | | | | |
| VOCs were not detected | VOCs were not detected in surface soil samples at concentrations greater than Soil Cleanup Objectives | | | | | | | | | | |
| Inorganics (Metals) (m | g/kg) | | | | | | | | | | |
| Inorganics (Metals) were | e not detected in su | rface soil samples a | t concentrations gre | ater than Soil Clear | up Objectives | | | | | | |

Notes:

1. Surface Soils represent samples collected from the 0 - 2-inch interval only.

2. Only those analytes present at concentrations above the Restricted Commercial Soil Cleanup Objective are shown.

3. Includes surface soil samples analyzed for PCBs or BAP only as part of the soil pre-characterization work.

4. Samples collected from locations in areas beneath the existing building floor slab are not included.

| MA | ICOLM |
|----|---------------|
| PI | lcolm RNIE |
| | |

TABLE 10-5 Summary of Contamination Site-Wide Subsurface Soil 1132-1146 Seneca Street Site Buffalo, NY

| Analyte ¹ | Number of Samples Analyzed ^{2,3} | Frequency of Detection | Range of Detection (µg/kg) | Maximum Concentration (µg/kg) | Average Concentration (µg/kg) | Restricted Use Soil Cleanup Objectives - Commercial | Restricted Use Soil Cleanup Objectives - Industrial | Frequency of Detections > SCO- Restricted Commercial | Frequency of Detections > SCO- Restricted Industrial | | |
|--|---|---------------------------|----------------------------------|-------------------------------------|-------------------------------------|--|--|---|---|--|--|
| Semi-Volatiles Organic Compounds (μg/kg) | | | | | | | | | | | |
| SVOCs were not detected in the 12 subsurface soil samples at concentrations greater than Soil Cleanup Objectives | | | | | | | | | | | |
| PCB (µg/kg) | | | | | | | | | | | |
| Total PCBs | 28 | 19 / 28 | 28 - 15,400 | 15,400 | 4,559 | 1,000 | 25,000 | 10 of 28 | 0 of 28 | | |
| Volatiles Organic Com | ipounds (µg/kg) | | | | | | | | | | |
| VOCs were not detecte | d in the 12 subsurfa | ace soil samples at o | concentrations grea | ter than Soil Cleanı | ıp Objectives | | | | | | |
| Inorganics (Metals) (m | Inorganics (Metals) (mg/kg) | | | | | | | | | | |
| Arsenic | 12 | 12 / 12 | 3.8 - 24 | 24.0 | 11.7 | 16 | 16 | 2 of 12 | 2 of 12 | | |
| Barium | 12 | 12 / 12 | 59.6 - 704 | 704 | 176.5 | 400 | 10,000 | 1 of 12 | 0 of 12 | | |

Notes:

1. Only those analytes present at concentrations above the Restricted Commercial Soil Cleanup Objective are shown.

2. Includes subsurface soil samples analyzed for PCBs only as part of the soil pre-characterization work.

3. Samples collected from locations in areas planned for surface/subsurface soil removal or beneath the existing building floor slab are not included.

Remedial Alternatives #3, #4, and #5 would all effectively reduce the long-term risk to public health and the environment by removing the most acutely impacted material that poses the potential risk. The contaminants that will remain in the soils at the Site following redevelopment will be of relatively low concentration and mostly or completely covered with Site development features including buildings, paved parking lots, driveways, walkways and vegetation. In addition, the contaminants of concern are generally considered immobile and, therefore, do not pose a threat via migration to adjacent properties via groundwater flow or vapor migration.

In addition, the industrial use of the Site will be controlled through City zoning, land use and design guidelines, and deed restrictions. Therefore, with the impacted soil/fill of concern removed from the Site, the remaining soil/fill mostly or completely covered, the future use of the Site limited to industrial use, and future handling of the remaining soil/fill managed through the use of a Excavation Work Plan, any of the three alternatives considered will provide long-term effectiveness and permanence in achieving the RAOs for the Site.

10.3.5. Reduction of Toxicity, Mobility, or Volume

This evaluation criterion addresses the preference for selecting a remedial action alternative that permanently and significantly reduces the volume, toxicity, and/or mobility of the hazardous wastes and/or constituents. This preference is satisfied when the remedial action is used to reduce the principal threats at a Site through destruction of toxic contaminants, irreversible reduction in contaminant mobility, or reduction of total volume of contaminated media. The following is the hierarchy of remedial technologies ranked from most preferable to least preferable:

- 1. Removal/Destruction
- 2. Separation/Treatment
- 3. Solidification/Chemical Fixation
- 4. Control and Isolation

As supported by the Qualitative Risk Assessment, remedial Alternatives #3, #4, and #5 are all protective of public health and the environment. Additional treatment-focused remedial alternatives (e.g., destruction, separation/treatment, and solidification/ chemical fixation) therefore are considered unnecessary.

Remedial Options #3, #4, would remove the contaminants of primary concern (i.e. elevated PCBs, BAP, and any impacts of the UST) thus reducing the volume of hazardous constituents at the Site. Both of these alternatives would also control remaining residual concentrations of contaminants of concern by complete to nearly complete coverage of the soil/fill by buildings, roadways, parking lots, and vegetation as





well as limiting use of the Site to industrial and implementation of an Excavation Work Plan.

If concentrations of contaminants of concern detected in soils during future Site maintenance or construction are above industrial SCOs, the impacted soil/fill material will be removed from the Site and properly disposed, thereby further decreasing the volume of contamination at the Site.

10.3.6. Short-Term Effectiveness

The effectiveness of alternatives in protecting human health and the environment during construction and implementation of the remedial action is evaluated under this criterion. Short-term effectiveness is assessed by protection of the community, protection of workers, environmental impacts, and time until protection is achieved.

Initially, the restriction of access to the Site in its present condition has reduced the risks posed by the Site to the general public prior to Site remediation and redevelopment. Under Alternatives #3, #4, and #5, the removal of impacted soil/fill and the UST and related soil/fill all equally reduce the risk to public health and the environment in the short-term and long-term by removing the materials that pose the greatest potential risk.

An Excavation Work Plan will further help to protect on-Site workers, the public, and the environment during Site redevelopment activities. During redevelopment activities, workers engaged in subsurface construction or maintenance activities will be required to implement a Site-specific, activity-specific Health and Safety Plan. In the short-term, the impact to human health and the environment during implementation of any one of the three alternatives considered will be negligible, will achieve the Remedial Action Objectives and are anticipated to be completed in approximately two months.

10.3.7. Implementability

A feasible remedy is one that is suitable to Site conditions, is capable of being successfully carried out with available technology, and considers, at a minimum, implementability. Remedial Alternatives #3, #4, and #5 are all suitable to current and future Site conditions and Site uses. Materials and equipment for removal of the PCB-, and BAP-impacted soil/fill and the UST are readily available. The removal actions are relatively easy to implement since all areas of planned removal action are accessible and shallow. The PCB-excavated areas will be backfilled with documented clean soil per DER-10 Appendix 5 and the Site covered nearly completely or completely with buildings, pavement and managed vegetation.

10.3.8. Community Acceptance

Redevelopment of formerly vacant industrial properties at 1122, 1132, and 1146 Seneca Street is an important step for the surrounding neighborhood and the City of Buffalo as a





whole. These redevelopment efforts will create positive economic benefits for the City of Buffalo and have been met with the support of the local community. Any one of the three considered remedial alternatives will remove the primary environmental contamination and therefore risks from the Site. An alternative which sufficiently removes the contamination of concern from the property and returns the Site to productive and neighborhood friendly use meets community acceptance.

10.3.9. Cost

Remedial Alternative #3 is estimated to cost approximately \$1.255 million, see Table 10-1. Remedial Alternative #4 is estimated to cost approximately \$420,000, see Table 10-2. Remedial Alternative #5 is estimated to cost approximately \$390,000, see Table 10-3.

The applicant has made arrangements to pay for this remedial alternative and the Site redevelopment with the help of bank loans and a local grant. Significant increases in cost cannot be sustained by this small business and could jeopardize the project as a whole.

10.4. Recommended Remedial Alternative

The remedial alternatives analysis was completed giving consideration to the Part 375-6.8 (a) SCOs for unrestricted use, and Part 375-6.8 (b) SCOs for restricted commercial and restricted industrial use.

Remedial alternative #3 (Track 2 cleanup to commercial standards) is not recommended because cleanup to the commercial standards is not warranted for this industrial Site and the cost to remove the additional volume of soil/fill (\$1.255 million) would put the project in jeopardy due to lack of funding.

Remedial alternative #5 is not recommended for the following reasons:

- The scarce presence, low number, and low concentrations of contaminants present in the on-Site soil/fill (after removal of hazardous levels of PCB-impacted soil/fill) makes placement of a Site-wide cover system impractical and unnecessary.
- The planned industrial warehouse use of the Site precludes contact with the soil/fill during on-Site activities which will take place primarily inside the warehouse building.
- The area of the Site that is not to be covered by buildings, roads, parking lots, and walkways is relatively small, 20 percent of the Site. That which is currently not planned for one of these paved surfaces will be covered with vegetation and possibly a new building from a subsequent phase of development. The imposing requirement of a Site-wide cover system along with the long-term requirements associated with it because of one relatively small uncovered area of the Site is disproportionately conservative and relatively expensive for the arguably small added protective benefit it may provide.





Based on the known levels of contamination at the Site, as determined from data collected from multiple Site investigations and a qualitative assessment of potential risks to the public health posed by Site contamination, it was determined that the primary concern at this Site is direct contact, inhalation, and ingestion of PCBs in surface and near surface (≤ 2.0 feet) soils on the 1122 and 1132 properties and direct contact with surface soils containing elevated levels of BAP in surface soils on the 1146 Seneca Street property. It was further determined that the removal of soil/fill that contains greater than 25 mg/kg of total PCBs (the industrial use SCO) and surface soils containing greater than 1.1 mg/Kg of BAP would sufficiently mitigate this potential risk to current trespassers and current/future Site workers at this industrial Site. Therefore **Remedial Alternative #4 (Track 2 cleanup to restricted industrial SCOs) is recommended for the Site.** This remedial option is recommended for the Site because it would meet the remedial action objective, is protective of public health, is achievable, affordable, and would meet the Site redevelopment plans and schedule.

Figures 10-1,10-1A, 10-2 along with accompanying Tables 10-4 and 10-5 provide a summary of analytical results of soil/fill that would remain in place under this remedial option. The constituents, frequency, range, average, and maximum concentrations of each analyte detected in the soil fill at concentrations above the industrial and/or commercial SCOs are included in these tables and figures. As seen on these tables and figures, at most just five of the 140 parameters tested are present above commercial SCOs and none above industrial SCOs. Further, all three of these locations are located in areas that are planned to be covered by either a paved parking or a future Site building.

Once the Site is re-developed, consequential contact with the minimally-impacted soil/fill will be highly unlikely as most daily activity will take place inside of the on-Site warehouse building. As illustrated on Figure 8-2, the planned Site redevelopment will cover approximately 80 percent of the Site with buildings, paved parking, roads, and walkways. The area of the Site not currently planned for such cover will be fully vegetated (lawn) and is located in the rear of the Site where no day-to-day use will take place. Furthermore, there are plans to build a new building on this currently un-paved rear area of the Site as part of a subsequent Phase of Site development, thus providing further protection.

The Site will be used for industrial use and will remain industrial as dictated by City zoning and an institutional control requiring no Site use higher than industrial. The site will be fenced in the rear to restrict access by trespassers. Potential future excavation of soil/fill will be managed with an Excavation Work Plan, which will be included as part of the Site Management Plan.





10.5. Health and Safety

Health and Safety considerations and procedures are the same for all three remedial alternatives considered.

Invasive work performed at the Site will be performed in accordance with applicable local, state, and federal regulations to protect worker and public health and safety. Contractors performing redevelopment or maintenance activities involving intrusive work at the Site are required to prepare a Site-specific, activity-specific Health and Safety Plan that will include a Community Air Monitoring Plan (CAMP). Data summary tables provided in Section 7 of this report should be used by the contractor to facilitate the creation of an appropriate Health and Safety Plan.

When on Site for investigation, remediation, and construction oversight purposes, Malcolm Pirnie personnel will follow the provisions of their own Site-Specific Health and Safety Plan.

10.6. Citizen Participation

As required in the Brownfield Cleanup Agreement, a Citizen Participation Plan has been prepared by Malcolm Pirnie and was approved by the NYSDEC. The CPP has been sent to the public document repository for public availability.

10.7. Schedule

A primary goal of the BCP applicant is to receive a Certificate of Completion (COC) from the NYSDEC and place the new facility into service during the 2010 calendar year. The schedule for remediation and redevelopment of the 1132-1146 Seneca Site is provided in Figure 10-3.





Figure 10-3 BROWNFIELD CLEANUP PROGRAM SCHEDULE 1132 and 1146 SENECA STREET SITE BUFFALO, NEW YORK

| | T | Aj | | | | May | | | | un | | | Jul | | | Au | | | | Sep | | | 0 | | I | | Nov | | Т | D | ec |
|---|------|----|------|----|----|-----|------|------|------|----|----|------|------|----------|-----|----|----------|----|---|----------|-------|-----|----------|------|------|----------|-----|------|------|------|-------|
| Week Beginning Date (Monday | /) 5 | 12 | 19 2 | 63 | 10 | 17 | 24 3 | 31 7 | 7 14 | 21 | 28 | 5 12 | 2 19 | 26 | 2 9 | 16 | 23 | 30 | 6 | 13 2 | 20 27 | 7 4 | 11 | 18 2 | 25 1 | 1 8 | 15 | 22 2 | .9 (| 6 13 | 20 27 |
| Brownfield Cleanup Program Tasks | | | | | | | | | | | | | | | | | <u> </u> | | | | | _ | | | | | | | | | |
| Remedial Investigation Report/Remedial Work Plan | | | | | | | | | | | | | | | | | ļ | | | | | | <u> </u> | | | | | | | | |
| Preparation of RI/RWP (submit by 6/1) | | | | | | ļ | | , | | | | | | | | | ļ | | | | | | | L | | <u> </u> | | | | | |
| DEC review of RI/RWP | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 45-day public comment period for the RI/RWP | | | | | | | | | | | | | | | | | | | | | | | <u> </u> | | | | | | | | |
| Address DEC/public comments and submit final RI/RWP) submit by 7/30) | | | | | | | | | | | | | | | | | <u> </u> | | | | | | <u> </u> | | | | | | | | |
| Environmental Easement Package (Easement, title report, Site Survey) | | | | | | | | | | | | | | | | | <u> </u> | | | | | | <u> </u> | | | | | | | | |
| Preparation of draft EE package (due on 6/1) | | | | | | | | | | | | | | | | | <u> </u> | | | | | | <u> </u> | | | | | | | | |
| DEC Review of Draft EE package | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Finalization of EE package - Submittal of applicant-executed EE - due 0n 9/30 | Ι | | | | | | | | | | | | | | | | | | | | • | | | | | | | | | | |
| Execution of EE by Department Director (by October 11) | Ι | | | | | | | | | | | | | | | | I | | | | | | | | | | | | | | |
| Recording of Final EE (on or before 10/15) | Ι | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Site Management Plan (SMP) | | | | | | | | | | | | | | | | | <u> </u> | | | | | | <u> </u> | | | | | | | | |
| Preparation of draft SMP (due on 6/1) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| DEC review of SMP | Ι | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Finalization of SMP (submit by 9/15) | | | | | | | | | | | | | | | | | | | | | | | <u> </u> | | | | | | | | |
| Site Remediation and Construction | | | | | | | | | | | | | | | | | | | | <u> </u> | | | <u> </u> | | | | | | | | |
| Site Remediation and Construction | | | | | | | | | 1 | | | | | | | | | | | | | | <u> </u> | | | | | | | | |
| Final Engineering Report | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Preparation of Draft FER (due on 9/30) | Ι | | | | | | | | | | | | | | | | | | | | • | | | | | | | | | | |
| DEC Review of draft FER | | ļĨ | | | | LĪ | | | | | | | | <u> </u> | | | | | | | | | | | | | | | |] | |
| Finalization and submittal of FER (due on 11/15) | | | | | | LĪ | | | | LĪ | | | | <u> </u> | | | ļ | | | | | | | | | | | | | | |
| DEC issues Certificate of Completion (COC) | | ļĨ | | | | LĪ | | | | | | | Ī | <u> </u> | | | | | | | | | | | | | | | | | , |
| Flexo Places facility in service (by 12/31/10) | | 11 | | | | ΙĪ | | | | ΙĪ | ſ | | 1 T | ſ | | | | 1 | ľ | | | | | | | |] | | | 11 | |

NYSDEC review Public comment period Malcolm Pirnie Flexo Field work (OpTech and/or construction contractors) Harris Beach Flexo site remediation and redevelopment Deliverable submittal date

DEC- Required deliverable date.

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11. Site Management Plan and Final Engineering Report

11.1. Site Management Plan

A Site Management Plan (SMP) will be prepared as a requirement of the Environmental Easement and will include an Excavation Work Plan. The purpose of the Site Management Plan is to document long-term environmental obligations associated with the Site and provide specific instructions on how those obligations are to be met. Obligations include but are not necessarily limited to soil/fill handing procedures, Site inspections and reporting. The NYSDEC-prepared SMP checklist will be used when preparing the SMP to assist with completeness and will be provided along with the SMP submittal.

Also, a NYSDEC-prepared SMP Template will be used to prepare the SMP to achieve consistency with NYSDEC expectations and to expedite NYSDEC review and approval of the SMP.

11.2. Final Engineering Report

Once the Site remediation has been completed a Final Engineering Report (FER) will be prepared and submitted to the NYSDEC. The purpose of the FER is to fully document the implementation of the Site remedy and to certify, by a registered professional engineer, that the remedial program activities were implemented in conformance with the Department-approved Remedial Work Plan.

The FER will include a description of the selected remedy, details and supporting documentation of remedial actions performed, and required certifications.

A Checklist for FER approval, as provided by the NYSDEC will be used during FER preparation to assist with completeness and will be provided along with the FER submittal.

Also, a NYSDEC-prepared FER Template will be used to prepare the FER to achieve consistency with NYSDEC expectations and to expedite NYSDEC review and approval of the FER.





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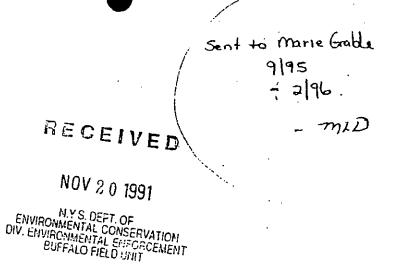
Flexo Transparent, Inc. REMEDIAL INVESTIGATION REPORT

Appendix A

Documentation of Previous Remedial Measures



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October 16, 1991

REPORT

REMOVAL OF CONTAMINATED SOIL EASTERN ELECTRIC FACILITY BUFFALO, NEW YORK

FOR

WESTINGHOUSE ELECTRIC CORPORATION

DAMES & MOORE

3065 Southwestern Blvd., Suite 202 Orchard Park, New York

REPORT

REMOVAL OF CONTAMINATED SOIL WESTINGHOUSE ELECTRIC CORPORATION EASTERN ELECTRIC APPARATUS FACILITY BUFFALO, NEW YORK

1.0 INTRODUCTION

This report summarizes contaminated soil removal operations at the Eastern Electric Apparatus Facility, <u>1132 Seneca Street</u>, Buffalo, New York. The report and the work upon which it is based were performed under the responsible charge of Mr. Robert R. Blickwedehl, P.E. (State of New York), in accordance with Section 9.0 of the Work Plan "Certification of New York P.E. Engineer." The report is prepared pursuant to Amendment 1 to the Remediation Work Plan for the above referenced site, dated January 15, 1990. The report includes a certification that this portion of the work was done in accordance with Westinghouse Electric Corporation's prescribed Work Plan dated August 30, 1989.

Soil removal was one of two components of the limited remediation effort at the Eastern Electric Site. The other component involved decontamination of a spray pit. This activity is documented in Dames & Moore's report dated October 16, 1991, and entitled Spray Booth Area Decontamination and Sewer Evaluation.

Dames & Moore provided overall project management support for the soil removal project. The onsite observation was performed by Mr. J. Britt Quinby, Project Civil Engineer, under the responsible charge of Mr. Blickwedehl. Mr. Quinby and Mr. Blickwedehl also provided technical consultation during discussions and meetings with Mr. Thomas D. Johnson and Mr. E. Joseph Sciasca, P.E., of the NYSDEC. Copies of the curriculum Vitae for Messr's Quinby and Blickwedehl are included in Appendix D of this report.

Contaminated soil removal was performed in three phases. The first phase was performed in November of 1989, the second phase was in June, 1990, and the third in October 1990. Westinghouse Environmental & Geotechnical Services, Inc. (WEGS) of Toledo, Ohio performed the excavation and remedial work for the first phase, Buffalo Drilling, Inc. of Buffalo, New York performed drilling and sampling during Phase II, and Environmental Products and Services, Inc. of Buffalo, New York performed the soil removal of Phase III. Buffalo Drilling and Environmental Products and Services were subcontractors to Dames & Moore.

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The technical content of the report is divided into six sections as follows:

- 1. A description of soil removal activities;
- 2. A summary of the quantities of soil removed and disposed of;
- 3. Photocopies of manifest and disposal documents;
- 4. A sketch showing soil sample locations;
- Laboratory analysis of soil samples along with SW 846 Section 1.5 QA/QC reportables and deliverables package; and.
- 6. Certification that the work was done in accordance with the approved work plan.

2.0 DESCRIPTION OF SOIL REMOVAL ACTIVITIES

The soil removal activities consisted of the removal of <u>two</u> piles of contaminated sludge, (referred to as pile #1 and pile #2), and the effected soil below and around them. The piles were located on the North East corner of the facility property and encompassed an area approximately 40 feet square, (reference Figure 1 and 2 in Appendix B).

2.1 PHASE I

On Friday, November 17, 1989, the area surrounding Pile #1 and #2 was separated into a Hot Zone, Support Zone and decontamination area for exit/entry. The Hot Zone encompassed Pile #1, Pile #2 and an area sufficiently large enough to contain the trackhoe and two 25-cubic yard roll-off boxes. A decontamination area and Support Zone was established just to the south of the site prior to the edge of the gravel parking lot.

Two sides of the newer chain link fence (the Southern and Western sides) and approximately 50 feet of the old chain link fence were temporarily removed. The trackhoe was then placed in the north-west corner of the area with the roll-off boxes to the south and to the west of Pile $\sharp 1$. This enabled the trackhoe to excavate contaminated soil and transfer it to roll-off boxes while being positioned in a "clean" area.

Prior to excavation the NYSDEC was notified. Mr. Johnson of the NYSDEC was on site during the excavation activities.

The trackhoe excavated Pile #2 first, then Pile #1. The contents of piles plus 6 to 8 inches of subsoil were removed. The horizontal excavation limits extended 4 to 8 feet out from each pile. One 25 c.y. rolloff box, lined with visqueen, was filled.

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During excavation, water or saturated soil was encountered approximately 12 to 18 inches below the ground surface. This limited the depth of the excavation in accordance with the terms of the work plan which did not contain provisions to handle a wet excavation and the risk of potential spread of contamination. Therefore, nine (9) post excavation soil samples were taken above these saturated conditions at several locations as shown on Figure 1.0 in Appendix B of this report.

The samples were collected in accordance with the procedures outlined in Appendix B of the Work Plan. It was the intent of the field crew to do a headspace screening of each sample for volatile organics five minutes after the samples were collected, but due to a malfunctioning OVA, this was not possible. A field judgement was made by Mr. Quinby, and Messrs. Bowman and Alliman of WEGS, to forward the samples to NUS without doing the headspace screening. This was based on the premise that even if the OVA readings were above the 10 ppm limit, further excavation would not be possible during this project phase due to the presence of water.

The samples were packaged and delivered by Mr. Alliman to NUS in Pittsburgh, Pennsylvania the next morning.

When excavation and sampling activities were completed for the day, both Pile #1 and Pile #2 excavated areas were covered with visqueen and the rolloff boxes covered and secured.

On Sunday the 19th, contaminated soil was transferred from the full rolloff box to a second empty rolloff. Bulk waste (visqueen and disposable personnel protective equipment) generated from the spray booth pit cleaning was also placed in the second rolloff. Both rolloff's were then covered and secured.

On Monday, November 20th the Westinghouse crew constructed a decontamination pad out of Hypalon which was elevated at the edges by an earthen berm. A high pressure water rinse was used to clean the entire trackhoe, including the under carriage, of all soil, sludge, and dust. The bucket of the trackhoe was the only part of the equipment that came into contact with PCB contaminated material. It was wiped clean with penetone prior to water rinsing. Rinse and wash water were collected on the decon pad and placed into 55 gallon drums.

That afternoon NUS called with the PCB and total volatile organic sample results from the first round of samples collected the previous Friday (see Table 1.0 for a summary of the results and Appendix C for a copy of the Lab Report and QA/QC package). Two sample locations showed results of PCB concentrations lower

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than 1 ppm - #5 and #9. Also, except for 1,1-dichloroethane found in samples #2 and #7, the sample results for the volatile organics were under the 1 ppm target level.

Since the concentrations of PCB's in soil samples #2, #3, #4, #6, #7, #8 and #10 were all above 1 ppm, further excavation in these areas was needed. Mr. Joseph Sciasca of the NYSDEC was on site shortly after the sample results were available. A site meeting was held between Mr. Sciasca, Mr. Bowman of WEGS, and Mssr's Quinby and Blickwedehl of Dames & Moore to determine how to proceed with the work under conditions involving saturated soil.

Mr. Sciasca suggested that the excavations continue under these "wet" conditions. He proposed that the confirmation samples of the soil under the piles be obtained using a core sampler. However, because this is below the water table, and would constitute a significant change from the original work plan, and since there was a possibility of contaminating clean underlying soil with water in the excavation and/or sampling holes, the determination was made to remove soil to only the depth that was at or close to saturated conditions. Therefore, WEGS used shovels to remove an additional 2 to 3 inches of soil within the excavated areas.

That afternoon, November 21, 1989, a second round of soil sampling was performed (see Figure 1.0). The samples were again collected in accordance with Appendix B of the Work Plan. These samples were screened via a headspace measurement with an OVA. The results of this screening can be found in Table 2.0 provided at the end of this report. The samples were then packaged and shipped to NUS for analysis.

The contaminated soil area was then covered with visqueen, hazard tape was placed around the area, and a snow fence was erected to serve as a temporary barrier until the project could be completed. The same day WEGS completed their demobilization activities and left the site. No further work could be done until the receipt of the second round of soil sample results.

The second round of sample results were available the week of December 16, 1989. Original sample point locations #2, #3, #4, #6, #7, #8, and #10 had been resampled and were relabeled #2P, #3P, #4P, #6P, #7P, #8P, and #10P respectively. The results are summarized in Table 1.0 and a copy of the Lab Report and QA/QC package can be found in Appendix C.

The concentrations of PCB's and the volatile organics in the second round of sampling did not meet the target clean up levels as outlined in the Work Plan. The concentrations of PCB's ranged from less than 2 ppm to 64 ppm, and the concentrations for some of the volatile organics were above the 1 ppm target level.

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2.2 <u>PHASE II</u>

Since the confirmation soil sample results from the second round of sampling did not meet the target clean up levels as outlined in the Work Plan, and groundwater was encountered near the resultant surface of the excavated area, Amendment 1 to the Remediation Work Plan dated January 15, 1990 was developed by Dames & Moore. This amendment addressed procedures to be used in characterizing the depth to which contamination had penetrated the soil, (Phase II), and excavation of soil under saturated conditions, (Phase III). The plan was submitted to the NYSDEC on January 17, 1990 and subsequently approved on January 30, 1990.

On Monday, June 11, 1990, Buffalo Drilling Company, Inc., of Buffalo, New York, working under the direction of Dames & Moore, mobilized a track mounted drill rig to the site to sample the soil in the affected area. The samples were needed to characterize the extent of the contamination as outlined by Continuous split spoon samples were taken at the Amendment 1. six locations shown on Figure 2.0 in Appendix B. The samples extended from the bottom of the excavation surface (approximately 18" below original grade) to a depth of 6 feet. Sampling locations #22, #32, #42, #62, #72, and #102 taken from Pile 1 area and #82 taken from Pile 2 area correspond to sampling locations #2P, #3P, #4P, #6P, #7P, and #10P from Pile 1 area and sample #8P from Pile 2 area collected during sampling activities of November 1989. All soil sampling and handling procedures were in accordance with Amendment 1 to the Remediation Work Plan, dated January 15, 1990.

The soil samples were inspected in the field by Mr. Quinby and descriptions were logged. Field screening was performed on the upper two split spoon samples (0-2' and 2-4' samples) using an organic vapor analyzer (OVA) in accordance with Section 5.2.3, of the Work Plan. The concentrations of VOC's detected by the OVA ranged from 0 to 5 ppm for the series of samples collected from the upper 0 to 2 foot depths, (see Table 2.0 located at the end of this report). The split spoon samples collected from the 4 to 6' depth interval were used to visually classify the soils and make observations as to the soils general condition and makeup.

At the completion of the sampling effort, the borings were grouted and the drill rig and all associated equipment were decontaminated in accordance with Section 5.2 of the Work Plan.

Subsurface soils encountered during the sampling activities consisted of 12 to 24 inches of loose gravel, sandy gravel and cinders to sandy clay overlying stiff brown silty clay to clay. This dry stiff silty-clay to clay layer was identified down to a

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depth of six feet and the borings did not penetrate beneath it. The upper gravel and sandy zones were moist, with decreasing moisture content with depth. The lower most split spoon samples collected at each location $(4-6^7 \text{ in depth})$ appeared dry.

Field screening of these samples with an OVA revealed readings of less than 0.10 to 5 ppm, (see Table 2.0), analytical test results showed concentrations of the VOC's were below 55 parts per billion (ppb) (see Table 1.0). All PCB concentrations were below detection limits.

Analytical and field screening results were combined with boring logs to estimate the extent to which contaminated soil should be excavated and to identify potential problems in the underlying geological conditions which could impact Phase III remedial activities. Based on the available data, a minimum target excavation depth of 24 to 26 inches was established. Excavating to this depth would remove the upper granular soils and a few inches of the underlying silty-clay layer.

Mr. Tom Johnson of the NYSDEC was on site during the boring and sampling activities. He was also present during the head space analyses of the collected samples.

2.3 PHASE III

The information obtained during the Phase II characterization activities was used to establish the excavation depth and prepare contract documents for completion of the soil remediation effort. Environmental Products and Services (EPS) was subcontracted by Dames & Moore to complete the soil removal work at the site. NUS Laboratories was again used to perform the confirmation soil sample analyses.

On October 1, 1990, Mr. Jim Vreeland, Mr. Jim Barry, and Mr. John Scott of EPS were met on site by Mr. Quinby. They proceeded to establish the Hot Zone, Support Zone and decontamination area for exit/entry. These areas were the same as used during the excavation activities in November, 1989. Four 20 cubic yard rolloff boxes were delivered onsite the previous Friday and were positioned to the south of Pile #1 and to the east and south of Pile #2.

Prior to excavation Mr. Johnson of the NYSDEC was notified. He was onsite during excavation activities.

A backhoe was used to excavate Pile #1 and then Pile #2. The backhoe was maneuvered outside of the contaminated area with only the bucket contacting the contaminated soil being excavated. Little to no water was encountered during the excavation and approximately 90 cubic yards of soil was removed from the Pile #1 and Pile #2 areas and placed in rolloff containers.

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When the desired depth of 24 to 26 inches below the excavated grade (42 to 44 inches below the original grade) was reached, seven confirmation soil samples were taken. The locations of these sample points corresponded to the previous locations of the characterization activities and of November 1989. They were labeled #23, #33, #43, #63, #73, #83, and #103 (see Figure 3.0 in Appendix B). Each sample was collected in accordance with the procedures outlined in Appendix B of the Work Plan. Again, headspace readings using an OVA were performed on each sample in the field. The headspace results were all below 10 ppm and are reported in Table 2.0 attached to this report.

At the request of Mr. Johnson, Mr. Quinby obtained four more soil samples from the perimeter of the excavated area of Pile #1. These samples were labeled North, South, East, and West. Headspace measurements were again performed in accordance with procedures outlined in the Work Plan. The results of these readings indicated nondetectable for all four samples, these results are also listed in Table 2.0.

Since all headspace readings from the confirmation samples were nondetectable or below 10 ppm, the samples were packaged for shipment to NUS. Included with the sample shipment were two additional samples one was of the backfill material and the other was of the topsoil. Both materials were to be used in restoration of the site.

When excavation and sampling activities were completed, both Pile #1 and Pile #2 excavated areas were covered with visqueen, rolloff boxes covered and secured, the equipment decontaminated as outlined by the Work Plan, and a snow fence erected around the excavated area.

Laboratory results of the confirmation samples were received by Dames & Moore on October 11, 1990. A copy of these results and the respective QA/QC package can be found in Appendix C. The concentration levels of PCB's and total volatile organics in the samples were all within the target cleanup levels outlined in the Work Plan.

Analysis of the backfill sample showed a 9 ppb concentration of benzene. Even though the work plan did not call for confirmation that the material be free of volatile organics, EPS was asked to obtain another sample from a different source and analyze the source for PCBs as reviewed by the Work Plan. A sample was obtained directly from a truck that delivered backfill to the site. It was tested for PCB's and the results were nondectable. The results of the analysis of the topsoil sample initially provided by EPS were nondetectable for both volatile organics and PCB's. These analyses can be found in Appendix C, and are also tabulated in Table 1.0.

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These analytical data were transmitted to Mr. Johnson on October 19, 1990 during a meeting held at the Dames & Moore office in Orchard Park, New York. Ms. Maryann Grotefend of Westinghouse Electric Corporation, and Mr. Quinby were also in attendance at the meeting, the purpose of which was to discuss the status of the project and relay the results of the confirmation sample analysis to Mr. Johnson.

SITE RESTORATION 2.4

With the required analytical data showing that the target cleanup levels for PCB's and volatile organics as outlined in the Work Plan have been met, a decision was made by Westinghouse and agreed to by NYSDEC to backfill the excavation and commence with site restoration.

On October 25, 1990 EPS backfilled the excavations and restored the area back to its original grade.

The Contract Laboratory Protocol (CLP) backup package for the lab results were not received until after the backfill had been placed. While reviewing the CLP package, Mr. Quinby discovered (as a result of a misunderstanding by the laboratory) the analyses performed on the confirmation soil sample for volatile organics had been performed using the TCLP extraction protocol, and not on an as received basis as was done on all Even though the results from the TCLP extraction indicated extremely low to nondetectable previous samples. concentrations of volatile organics, the decision was made to obtain another set of confirmation samples and redo the VOC analysis on an as received basis. This was needed to provide a consistent comparison to the November 1989 results using the same analytical procedures for the confirmation sample analyses both times.

On November 2, 1990 Mr. Quinby accompanied by Ms. Jane Staten of Dames & Moore obtained seven more soil samples. The samples were labeled #24, #34, #44,#64, #74, #84, and #104, and correspond to the previous soil sample points (see Figure 3.0 in Appendix D). Samples of the underlying native material were obtained by hand boring through the newly placed backfill material to the resultant level of the excavation. This interface was easily identified. The backfill is a well graded sandy loam material which is dark in color. The native material consisted of silty, sandy, clay, fairly consolidated and light in consisted of silty, sandy, clay, fairly consolidated and light in color. The samples were collected and headspace readings taken with an OVA in accordance with the Work Plan. The results of the headspace readings are listed in Table 2.0 attached to this report.

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Headspace readings were nondetectable for all samples but one which was approximately 1 to 5 ppm. The samples were packaged and shipped to NUS for analysis. The volatiles were analyzed on an as received basis, consistent with the analysis performed on the samples from November, 1989.

Mr. Johnson, of the NYSDEC, was onsite during the resampling activities and collected two duplicate soil samples. Mr. Johnson packaged the samples and forwarded them to an independent lab as chosen by the NYSDEC.

Analytical results for the samples analyzed for Dames & Moore were available on November 13, 1990. All results were within the target cleanup levels and are listed in Table 1.0 located at the end of this report. The data and respective QA/QC package can be found in Appendix C.

Mr. Johnson informed Mr. Quinby on December 19, 1990 of the results from the analyses performed on the <u>duplicate</u> samples he had taken. They were consistent with the results obtained from NUS. A copy of these results can be found in Appendix C, and are summarized in Table 2.0.

On May 8, 1990, Environmental Products and Services completed the site restoration work by installing a chain link fence in the location were the original one had been previously removed in order to perform the soil excavation activities. They also placed seed and mulch over the affected area as required by Section 5.2.5 of the Work Plan.

3.0 CHARACTERISTICS AND DISPOSITION OF REMOVED SOIL

3.1 SOIL REMOVAL DURING THE NOVEMBER 1989 ACTIVITIES (PHASE I)

During the remedial activities of November, 1989 approximately 30 cubic yards of soil and debris were removed from the area in and around piles #1 and #2. The material was placed into two 30 cubic yard rolloff containers. A sample of the soil was obtained and forwarded to RECRA Environmental, Inc., (a New York State Certified laboratory), for TCLP extraction and a subsequent analysis for F-listed spent solvents (VOA's) to determine the soil's disposal status under 40 CFR Part 268, "Land Disposal Restrictions". The results of this analysis are provided in Appendix C and show a concentration of xylene which is above the limits imposed by the regulations for material that can be disposed in a permitted land disposal facility. Because of the elevated concentrations of xylene, the soil was considered an F listed waste, for which the Best Demonstrated Available Technology (BDAT) for disposal is incineration.

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Since the material contained in the rolloff's needed to be incinerated, the sample analytical results and another sample of soil was forwarded to Aptus Inc., in Coffeyville, Kansas. Based on this information and their evaluation of the sample, approval was granted for incineration of the soil by Aptus. The two rolloff containers were then transported off site in route to Coffeyville on May 30, 1990.

The permitted hazardous waste carrier contracted by Westinghouse Electric Corp. to transport the material to Aptus was Buffalo Fuel Corp., of Niagara Falls, New York. The material arrived in Coffeyville on June 1, 1990, and copies of the hazardous waste manifests are provided in Appendix A. The material in one rolloff container was destroyed by Aptus on August 1, 1990, and a copy of the Certificate of Destruction has been provided in Appendix A. Due to time constraints during the trial burn, at Aptus, the remaining material could not be incinerated there and was transported to a Chemical Waste Management permitted facility in Chicago for incineration. However, prior to it's destruction the incinerator was shut down due to operational problems. Therefore, the rolloff was transported back to Aptus, and was destroyed the week of October 7, 1991. A copy of the manifests and Certificate of Destruction are included in Appendix A.

3.2 SOIL REMOVED DURING THE OCTOBER 1990 ACTIVITIES (PHASE III)

The material excavated during October, 1990 totaled approximately 90 cubic yards and was placed in four 25 cubic yard rolloffs. A composite sample was obtained from the rolloffs and forwarded to RECRA Environmental Laboratory for TCLP extraction and a subsequent analysis to determine it's disposal status in accordance with 40 CFR Part 268, (as was done for the for the material removed in November, 1989). The results of this analysis are presented in Appendix C and show very low to nondetectable concentrations of the F-listed solvent wastes (VOA's). Based on these results, and PCB concentrations of 64 ppm, the soil could be disposed in a permitted land disposal This information along with a soil sample was facility. forwarded to Chemical Waste Management, Inc.'s permitted landfill located in Model City New York, and was subsequently approved for disposal at this facility.

The rolloff containers remained on site during the time required to characterize the waste and obtain approval for disposal from Chemical Waste Management. During this time, the covers on the containers were damaged by vandalism and adverse weather. As a result of the damage some rain water collected in the rolloffs. Thus, removal and proper disposal of the water was required prior to the transport of the material to Model City. To determine if the water could be disposed of by discharging it

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into the Buffalo Sanitary Sewer system, a composite sample of the water was collected and forwarded to RECRA Environmental, Inc. for analysis. Due to the presence of organics that were found in the TCLP extract and PCB concentration in the soil, the Buffalo Sewer Authority requested that the sample be analyzed for PCB's per 40 CFR Part 136, method 608. The results of this analysis showed a PCB concentration of 13 ppb. This was communicated to Mr. James Overholt of the Buffalo Sewer Authority. Based on the information furnished, approval was granted by the Sewer Authority to discharge the water in the rolloffs into the sewer system. Copies of the water sample analytical results are provided in Appendix C; the letter from Mr. Overholt approving the discharge of the water into the sewer system is provided in Appendix A.

On Thursday March 28, 1991 Mr. Quinby meet a laborer from Environmental Products and Services at the Eastern Electric site to transfer soil contained in the two overfilled rolloffs into a fifth one that had been delivered the preceding day, and to remove the water in the containers and discharge it into the sewer. Mr. Overholt met us on site and located the sewer inlet where the water was to be discharged. The soil and water transfer operations were completed that day and the pickup and transport of the containers to Model City was scheduled for the following day.

On Friday March 29, 1991 the permitted hazardous waste hauler contracted by Westinghouse Electric Corp., Tonawanda Tank Transport Service, Inc. picked up the five rolloffs of material for transport to CWM in Model City, NY. However, due to scheduling problems, the containers were transported to, and staged at Tonawanda Tank's facility until the following Monday, (April 1, 1991) at which time Chemical Waste Management could accept the shipment at their Model City facility. Four of the rolloffs were transported to Model City that Monday with the remaining one transported Tuesday April 2, 1991. Copies of the hazardous waste manifests used are provided in Appendix A.

Table 3.0 attached to this report provides a listing of the quantity of material removed and disposed. It also provides the location, date, and method of disposal.

4.0 <u>SUMMARY AND CONCLUSIONS</u>

As described in the previous sections of this report, all exterior cleanup activities required by the Work Plan were completed in accordance with the methods specified in the Work Plan as amended. A certification document to this effect is attached to this report.

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The activities documented in this report and those documented in Dames & Moore's report entitled Spray Booth Area Decontamination and Sewer Evaluation, dated December 13, 1990, fulfilled all remediation requirements cleanup objectives for the site.

> Respectfully submitted, DAMES & MOORE A Professional Limited Partnership.

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Robert R. Blickwedehl, P.E. New York Registration No. 54177 Partner, (Ltd.)

J. Britt Quinby Project Manager

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CERTIFICATION OF COMPLETION

CONTAMINATED SOIL REMOVAL

Eastern Electric Apparatus Facility 1132 Seneca Street Buffalo, New York

I hereby certify based on personal knowledge and belief that the soil removal work performed at the subject facility during the period of November 17, 1989, May 30, 1990, and March 28 and 29, 1991 was performed in accordance with the Approved Work Plan dated August 31, 1989, and addendum to the work plan dated January 15, 1990.

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webes Robert R. Blyckwedehl

New York Professional Engineer Registration No. 54177

TABLE 1.0 SUMMARY OF CONFIRMATION SOIL SAMPLE RESULTS FOR THE EASTERN ELECTRIC APPARATUS FACILITY SOIL REMEDIATION EFFORT

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| <u>#</u> | Date <u>Sampled</u> | PCB (ppm) | Total Volatile Organics (ppm) | Comments |
|------------|------------------------|--------------|---|-------------------------|
| 2 | 11/17/89 | 19.3 | 3.265 | PCB's - AR, PH's - AR |
| 2p | 11/21/89 | 64.0 | 13.330 | PCB's - AR, PH's - AR |
| 23 | 10/01/90 | < 0.2 | 0.015 | PCB's - AR, PV's - TCLP |
| 24 | 11/02/90 | | 0.014 | PH's - AR |
| 3 | 11/17/89 | 5.7 | 1.204 | PCB's - AR, PH's - AR |
| 3p | 11/21/89 | 6.3 | 0.033 | PCB's - AR, PH's - AR |
| 33 | 10/01/9 0 | < 0.2 | 0.020 | PCB's - AR, PV's - TCLP |
| 34 | 11/02/90 | | 0.009 | PH's - AR |
| 4 | 11/17/89 | 4.4 | 0.744 | PCB's - AR, PH's - AR |
| 4p | 11/21/89 | 1.4 | 0.003 | PCB's - AR, PH's - AR |
| 43 | 10/01/90 | < 0.2 | < D.L. | PCB's - AR, PV'S - TCLP |
| 44 | 11/02/90 | | <d.l.< td=""><td>PH's - AR</td></d.l.<> | PH's - AR |
| 5 | 11/17/89 | < 0.2 | 0.013 | PCB's - AR, PH's - AR |
| 6 | 11/17/89 | 4.5 | 1.237 | PCB's - AR, PH's - AR |
| 6 <u>r</u> | | <2.0 | 0.144 | PCB's - AR, PH's - AR |
| 63 | | < 0.2 | 0.018 | PCB's - AR, PV's - TCLP |
| 64 | | | <d.l.< td=""><td>PH's - AR</td></d.l.<> | PH's - AR |

TABLE 1.0 (Continued) SUMMARY OF CONFIRMATION SOIL SAMPLE RESULTS FOR THE EASTERN ELECTRIC APPARATUS FACILITY SOIL REMEDIATION EFFORT

| _# | Date <u>Sampled</u> | PCB (ppm) | Total Volatile Organics (ppm) | Comments |
|-----|------------------------|--------------|---|-------------------------|
| 7 | 11/17/89 | 17.0 | 3.402 | PCB's - AR, PH's - AR |
| 7p | 11/21/89 | 21.0 | 0.300 | PCB's - AR, PH's - AR |
| 73 | 10/01/90 | <2.0 | 0.011 | PCB's - PV's - TCLP |
| 74 | 11/02/90 | | 0.003 | PH's - AR |
| | | | | |
| 8 | 11/18/89 | 35.0 | 0.163 | PCB's - AR, PH's - AR |
| 8p | 11/21/89 | <2.0 | 0.002 | PCB's - AR, PH's - AR |
| 83 | 10/01/90 | 0.2 | 0.017 | PCB's - AR, PV's - TCLP |
| 84 | 11/02/90 | | 0.002 | PH's - AR |
| 9 | 11/17/89 | 0.38 | 0.010 | PCB's - AR, PH's - AR |
| 10 | 11/17/89 | 8.8 | 1.406 | PCB's - AR, PH's - AR |
| 10p | 11/21/89 | 19.3 | 0.981 | PCB's - AR, PH's - AR |
| 103 | 10/01/90 | < 0.2 | <d.l.< th=""><th>PCB's - AR, PV's - AR</th></d.l.<> | PCB's - AR, PV's - AR |
| 104 | 11/02/90 | | 0.002 | PH's - AR |

<D.L. = Less than detection limits. PCB's = Polychlorinated Biphenals PH's = Purgable Halocarbons PV's = Priority Pollutant AR = As Received TCLP = Toxicity Characteristic Leachate Procedure

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TABLE 2.0 SUMMARY OF SOIL SAMPLE FIELD HEAD SPACE READINGS FOR THE EASTERN ELECTRIC APPARATUS FACILITY SOIL REMEDIATION EFFORT

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| | Sample # | Date of <u>Reading/Sampling</u> | <u>Results (ppm)</u> |
|---|-------------|------------------------------------|----------------------|
| | | 11/18/89 | N.R. |
| | 2 | 11/21/89 | 750.00 |
| | 2P | 6/11/90 | 2.00 to 3.00 |
| | 22A | | N.D. |
| | 23 | 10/01/90 | 1.00 to 5.00 |
| | 24 | 11/02/90 | 1.00 00 0000 |
| | | 11/18/89 | N.R. |
| | 3 | 11/21/89 | 4.50 |
| | 3P | 6/11/90 | 1.00 |
| | 32A | 10/01/90 | N.D. |
| | 33 | 11/02/90 | N.D. |
| | 34 | 11/02/30 | |
| | | 11/18/89 | N.R. |
| | 4 | 11/21/89 | 2.80 |
| | 4p | 6/11/90 | N.D. |
| | 42A | 10/01/90 | N.D. |
| • | 43 | 11/02/90 | N.D. |
|) | 44 | 11/02/00 | |
| 1 | 5 | 11/18/89 | N.R. |
| | | 11/18/89 | N.R. |
| | 6 | 11/21/89 | N.D. |
| | 6P | | N.D. |
| | 62A | 6/11/90 | N.D. |
| | 63 | 10/01/90 | N.D. |
| | 64 | 11/02/90 | A.D. |
| | | 11/18/89 | N.R. |
| | 7 | 11/21/89 | 12.00 |
| | 7P | 6/11/90 | 2.00 |
| | 72 A | 10/01/90 | 0.10 |
| | 73 | 11/02/90 | N.D. |
| | 74 | 11/02/90 | - |
| | 6 | 11/18/89 | N.R. |
| | 8 | 11/21/89 | N.D. |
| | 8P | 6/11/90 | N.D. |
| | 82A | 10/01/90 | N.D. |
| | 83 | 11/02/90 | N.R. |
| | 84 | 11/02/00 | |

TABLE 2.0 (CONTINUED)

| Sample # | Date of <u>Reading/Sampling</u> | <u>Results (ppm)</u> |
|---------------------------------------|---|--------------------------------------|
| 9 | 11/18/89 | N.R. |
| 10 10P 102A 103 | 11/18/89 11/21/89 6/11/90 10/01/90 11/02/90 | N.R. 4.50 2.00 0.10 N.D. |
| 104 South North East West | 10/01/90 10/01/90 10/01/90 10/01/90 | N.D. N.D. N.D. N.D. |

N.D. = Non detectable; less than detection limits = <0.10 ppm. N.R. = No results (head space reading not taken).

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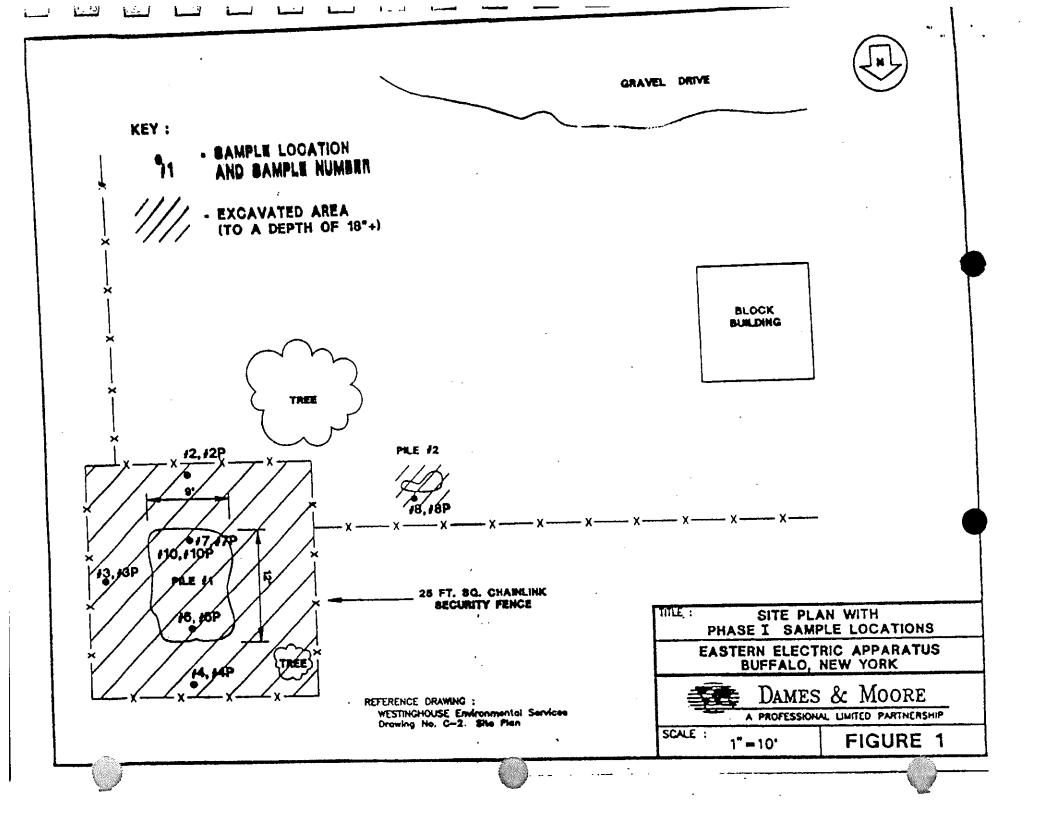
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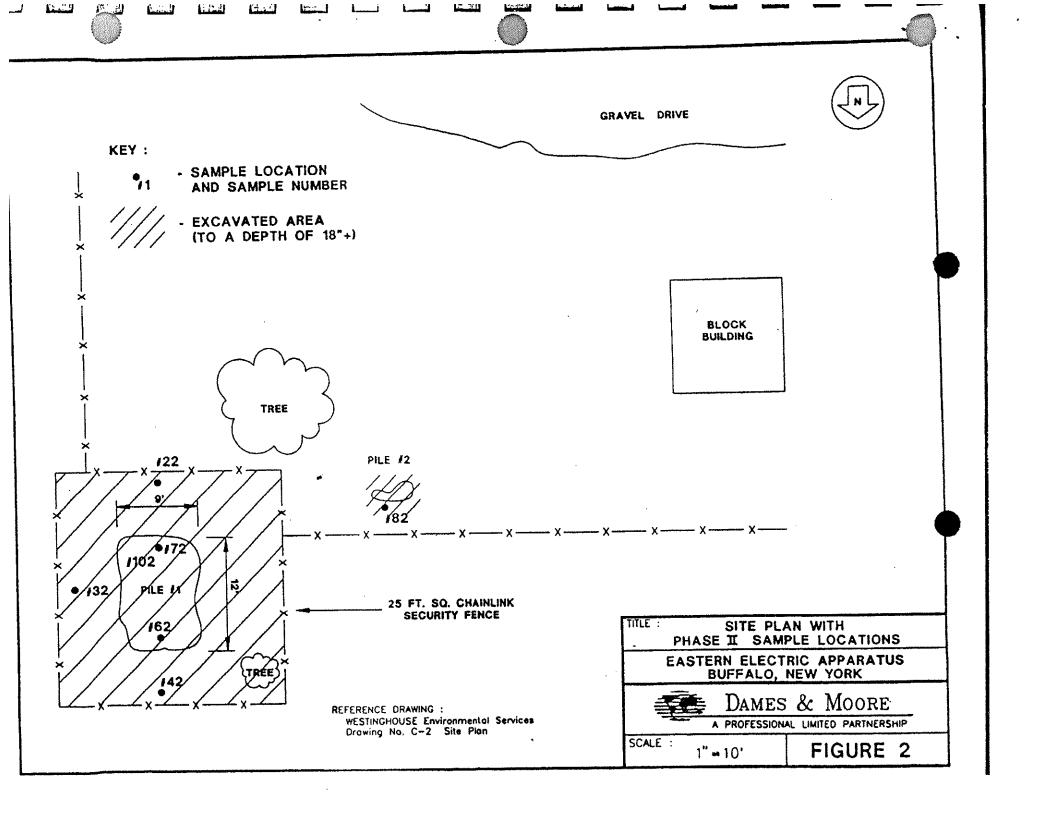
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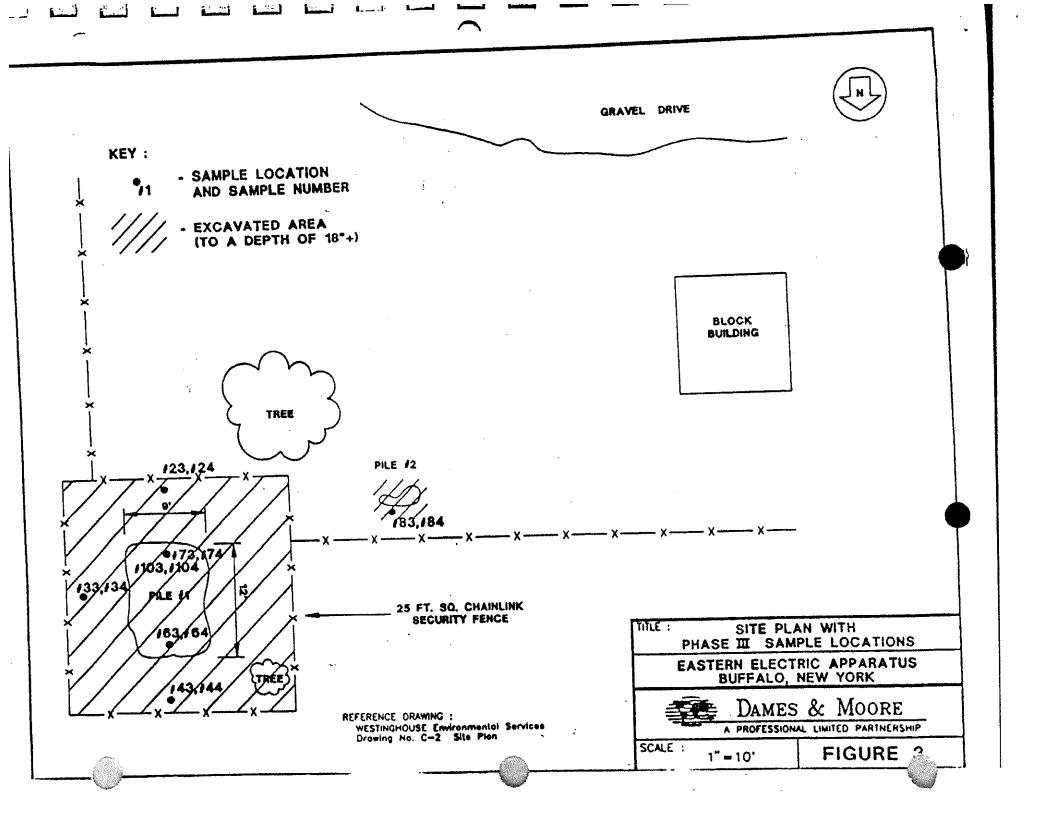
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TABLE 3.0 SUMMARY OF SOIL DISPOSAL

| Dates Material Removed | Quantity <u>Removed</u> | <u>Disposal Facility</u> | Date of Disposal | Method <u>of Disposal</u> |
|--------------------------------------|----------------------------|--|-------------------------------|------------------------------|
| November 17, to November 21, 1989 | 15 c.y.s. | Aptus Inc. Coffeyville, KS | August 1, 1990 | Incineration |
| November 17, to November 21, 1989 | 15 c.y.s. | Aptus Inc. Coffeyville, KS | Week of October 7, 1991 | Incineration |
| October 1, 1990 | 90 c.y.s. | Chemical Waste Management, Inc. Model City, NY | April 1, and April 2, 1991 | Land Disposal |







New York State Department of Environmental Conservation Division of Environmental Remediation, Region 9

270 Michigan Avenue, Buffalo, New York, 14203-2999 **Phone:** (716) 851-7220 • **FAX:** (716) 851-7226 **Website:** www.dec.state.ny.us



August 28, 2006

Mr. Ronald Maybry President Flexo Transparent 28 Wasson Street Buffalo, New York 14210

Dear Mr. Maybry:

Flexo Transparent 28 Wasson Street, Buffalo NYSDEC Spill No. 0650733

The Department has reviewed the 'Focused Phase II Environmental Assessment Report' prepared by Hazard Evaluations, Inc. dated July 13, 2006. This report provided preliminary data documenting a historical spill at the above-referenced site. The data was submitted to the Department and was assigned NYSDEC Spill No. 0650733.

This office has reviewed the groundwater and test pit soil/fill sample(s) laboratory results. The results exceed our soil guidance values (TAGM #4046) and New York State Groundwater Standards (Division of Water TOGS 1.1.1). The report states that strong odors were present and visual contamination was present on the site. However, based upon sampling results presented in the report, the soils/fill at the site are not considered hazardous waste. Subsequently, the site will have a status of 'inactive' in our Spill Report database.

Please note, any soils generated during future site excavations from the contaminated area must be tested and analyzed by an approved laboratory from New York State's Environmental Laboratory Program (ELAP). If sample results exceed guidance values listed in the Department's TAGM #4046, the excavated material may require remediation and will require proper disposal.

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Mr. Ronald Maybry August 28, 2006 Page 2

Currently, New York State offers the Brownfield Cleanup Program to encourage the remediation and redevelopment of contaminated sites. The program offers remedial and redevelopment tax credits for eligible contaminated sites. The Flexo Transparent site may be eligible. For further information on the Brownfield Cleanup Program please visit our website at http://www.dec.state.ny.us/website/der/bcp.

If you have any questions, please contact myself at (716) 851-7220

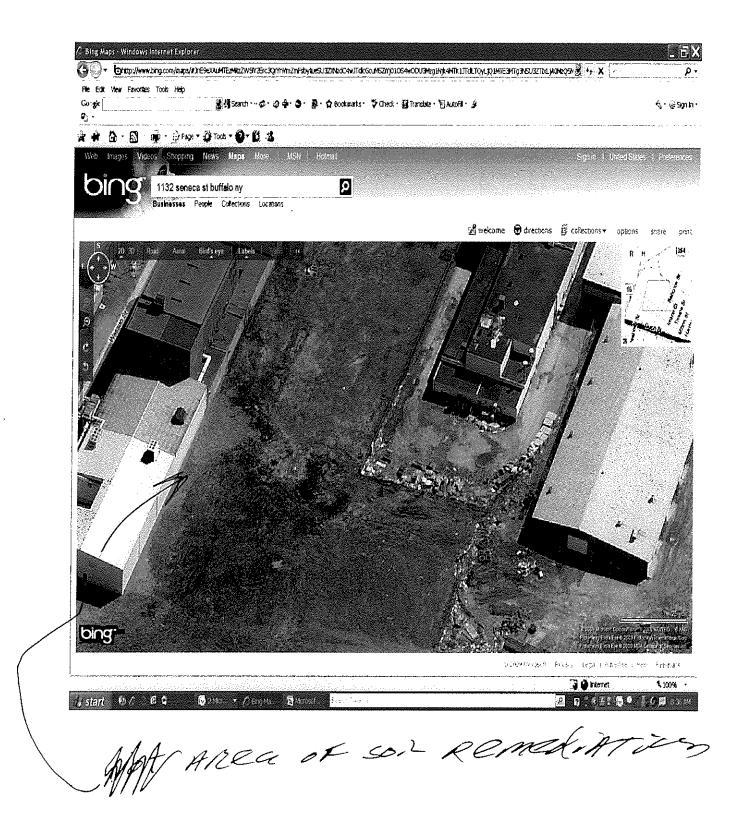
Sincerely,

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in L Joster

Chad Staniszewski, P.E. _____ Project Manager

cc: Mr. Daniel King, Regional Spill Engineer Mr. Mark Hanna, Hazard Evaluations Inc.





HAZARD EVALUATIONS, INC. • 3836 N. BUFFALO ROAD • ORCHARD PARK, NEW YORK 14127 716-667-3130 • FAX 716-667-3156

July 13, 2006

David S. DePasquale, Vice President First Niagara Bank PO Box 514 6950 South Transit Road Lockport, New York 14095-0514

Re: Focused Phase II Environmental Assessment Report; Industrial Property, 28-35 Wasson Street, Buffalo, New York

Dear Mr. DePasquale:

In accordance with our agreement, dated June 22, 2006, Hazard Evaluations, Inc. (HEI) completed a Focused Phase II Environmental Site Assessment (ESA) at the above-referenced (subject) site. Both the ESA and this related letter report were completed on behalf of, and for the use of, First Niagara Bank (hereinafter the "Client") for its reliance in the environmental assessment of the subject site. Use of this ESA report by any other party is strictly prohibited, except by authorization in writing from the Client.

This Focused Phase II ESA was completed to address a single condition of environmental concern selected by the Client, as previously identified in the LCS Phase I ESA, dated April 6, 2006, and LCS's follow-up letters of explanation, dated April 6 and April 14, 2006. This condition of concern is limited to an area of the subject site at the rear of the building along the western property boundary within which the reported historic dumping or discharge of waste ink/solvent mixtures occurred. It must also be noted that this specific area of the subject site historically contained, and was bordered by, railroad sidings/tracks. HEI's Investigative activities and the associated results of this Investigation are described in the following paragraphs, and only reflect the conditions of the subject site within the specific area of concern investigated.

Test Trench Excavation

Prior to performing any on-site subsurface activities, underground utilities were marked by the Underground Facilities Protection Organization (UFPO). On June 26, 2006, a mini-excavator was mobilized to the subject site In an effort to expose the soil profile within the area of concern and collect soil and/or groundwater samples. HEI excavated a total of five (5) test trenches along the western border of the subject site (Field Notes Sketch, Attachment 1 depicts the approximate test

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trench locations). The soil/fill encountered within each test trench was examined for the presence of staining, odors or other characteristics that would indicate the potential presence of regulated substances. Numerous samples were manually collected, placed in acetate sampling bags, and screened for the presence of voiatile organic compounds (VOCs) using a Thermo Model 580B organic vapor monitor (OVM).

Obvious apparent solvent-type odors were noted emanating from the soil excavated from Test Trenches A and C: however, no positive VOCs readings were measured. Additionally, stained soli/fill material exhibiting one or more colors, including black, orange, red and yellow (suspected to be waste lnks), was observed in Test Trenches A and C. The impacted soli/fill material generally appeared to exist within the top four to five feet below grade (bg) within these two test trenches. Also, a varlety of old construction-type materials was encountered in the test trenches, including limited brick and substantial structural wood. A native sandy clay material was found below this depth. Test Trench A was installed to approximately 9' - 10' bg, while Test Trench C was installed to approximately 6' - 7' bg. Apparent perched water (based on the soil conditions and the manner in which the water flowed into the trench) was observed entering Test Trench A in the vicinity of the soil/fill and native clay interface (approximately 9' bg). Bedrock was not encountered in either excavation.

Test Trench B was installed approximately 13' north of Test Trench A, but exhibited no obvious staining or odors. Test Trench D was installed approximately 23' south of Test Trench C, and only a slight odor was detected at the top of the clayey material (approximately 5' bg). Test Trench E was installed approximately 25' south of Test Trench D, and exhibited only a very slight unrecognizable odor that could not be characterized as being similar to the odor from Test Trench A.

A total of four soil/fill material samples were submitted for laboratory analysis, including: 1) Test Trench A Sand/Clay Composite; 2) Test Trench A (0'-4') Composite; 3) Test Trench B Excavated Material Composite; and 4) Test Trench E (3'-5') Clay Material. Each of these samples was analyzed for USEPA Method 8260 TCL (VOCs), 8270 TCL (SVOCs), RCRA Metals (Total & TCLP) and PCBs. Additionally, a water sample was collected from Test Trench A and submitted for the same parameters listed above, with the exception of TCLP RCRA Metals.

Subsequent to sample collection, all test trenches were backfilled and rough graded using the excavator blade. Attachment 1 presents the field notes that were prepared for this project.

Discussion of Results

The laboratory analytical results for the soil samples identified low levels of two target VOCs parameters in both the Test Trench A Sand/Clay Composite and Test Trench A (0'-4') Composite samples, including Xylenes and Acetone. Neither of these compounds exceeded applicable NYSDEC Recommended Soil Cleanup Objectives (RSCOs), as presented in Appendix A, Table 1 of TAGM HWR-94-4046, dated January 24, 1994 (TAGM 4046). Table 1 (Attachment 2) presents a summary of the VOCs data. The Laboratory Analytical Report Is presented in Attachment 3.

The SVOCs analysis revealed the presence of numerous target compounds in both the Test Trench A (0'-4') Composite and Test Trench B Excavated Material Composite samples. Benzo(a)anthracene, Benzo(a)pyrene and Chrysene were detected in both of these samples at concentrations exceeding the applicable NYSDEC RSCOs. It should be noted that 2-Methylphenol and 2,4-Dimethylphenol, which are compounds contained in Creosote (historically used for preserving railroad ties), were detected in the Test Trench A (0'-4') Composite sample. The level of 2-Methyl phenol (628 µg/kg) also exceeded the 100 µg/kg RSCO (Table 2).

The Metals analyses for the soil/fill samples Identified several metals slightly above the Eastern USA Background Levels, as presented in TAGM 4046; however, the concentrations were close to, or within the same order of magnitude as the published background levels (Table 3). In this regard, HEI suggests that the levels detected represent site background conditions and do not present a condition of environmental concern. The RCRA Metals TCLP analyses did not identify any metals exceeding the applicable toxicity characteristic limits.

There were no PCBs detected in any of the soil samples submitted (Table 4).

The laboratory analytical results for the Test Trench A water sample revealed the presence of four target VOCs parameters above the applicable NYSDEC Ambient Water Quality Standards and Guidance Values (WQSs), as presented in TOGS 1.1.1, dated June 1998. These parameters included Xylenes, Acetone. 2-Butanone (MEK) and 2-Hexanone (MIBK), which are all solvents currently or historically used in the printing industry (Table 5). It should be noted that the Xylenes and MIBK concentrations were only slightly above the WQSs, but that Acetone and MEK were at slightly higher levels, but may not present a condition of environmental concern within this heavily industrialized area of the City of Buffalo.

The laboratory analytical results for the Test Trench A water sample revealed the presence of two target SVOCs parameters above the applicable WQSs, including 2-Methylphenol and 2,4-Dimethylphenol (suspect Creosote constituents: Table 6). It should be also noted that these two SVOCs were at somewhat higher levels, but may not present a condition of environmental concern due to the significant historic railroad development within this area of the City of Buffalo.

The results for RCRA metals in the Test Trench A water sample only Lead at a concentration exceeding WQS (Table 7). However, given both the low levels of Total Lead detected in the soil/fill samples from the test trenches, and the apparent low leachability of that Lead in the soil/fill matrix, as well as no reported historic use of Lead-containing printing products on-site and the history of this general area of the City of Buffalo which has a known, widespread Lead contamination condition, HEI suggests that this may not present a condition of environmental concern. No PCBs were detected in the Test Trench A water sample (Table 8).

Conclusions

Based on the results of this limited investigation, HEI suggests that printing waste-impacted soil/fill and subsurface water exist in a restricted area along the western boundary of the subject site. This restricted area appears to be limited to the vicinity of Test Trenches A and C, although the specific lateral and vertical extent of this contamination is not clearly defined, especially with respect to whether It has remained on the subject site and not migrated off-site. It should be noted that if the solvent VOCs detected in the soll/fill samples are the result of historic dumping of printing wastes, the potential exists that they may represent listed hazardous wastes in accordance with 6 NYCRR Part 371.4(b)(1) under the F003 or F005 hazardous waste codes. However, the definitions for these two codes mandate that the concentrations of the regulated solvents before use had to be at least 10% of the mixture. In that regard, as the release of these substances predated the current owner/operator of the subject site, and as a result, it is highly unlikely that the formulations for any solvent/ink mixtures can be determined, HEI suggests that these released waste solvent/ink mixtures cannot be determined to have been listed hazardous wastes and only need to be addressed in accordance with the NYSDEC TAGM cleanup guidance procedures.

With respect to the apparent Creosote soil/fill contamination encountered, this type of subsurface contaminant is widespread throughout the area of Buffalo surrounding the subject site which was once the largest rail yard in the United States east of Chicago. Such contamination, when encountered and/or disturbed, must be addressed appropriately by excavation and off-site disposal. However, the contaminant levels encountered in this investigation may not warrant such a remedial response. Such a determination would need to be made by the NYSDEC.

Summary

HEI suggests that the site conditions encountered within the area of concern at the subject site represent a historic release that <u>appears to be</u> (but may not be) reportable to the NYSDEC Region 9 office by the current site owner. However, even if the reporting requirement is not triggered, the conditions encountered (VOCs exceeding TAGM RSCOs) appear to warrant at least limited excavation and removal remedial procedures to be completed by the owner/operator of the subject site. Some concern still exists with respect to whether these contaminants have migrated off-site to the west, and if so, to what extent. One additional concern related to this site contamination that may need to be addressed is the potential applicability of the Financial Accounting Standards Board (FASB) interpretation No. 47 (March 2005) of Financial Accounting Standard 143 that addresses the potential liability of potential and existing environmental management costs.

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The information presented above should adequately summarize HEI's investigative efforts and results regarding the specific environmental concern at the subject site, as identified above. If you have any questions regarding the contents of this letter report, please contact me directly.

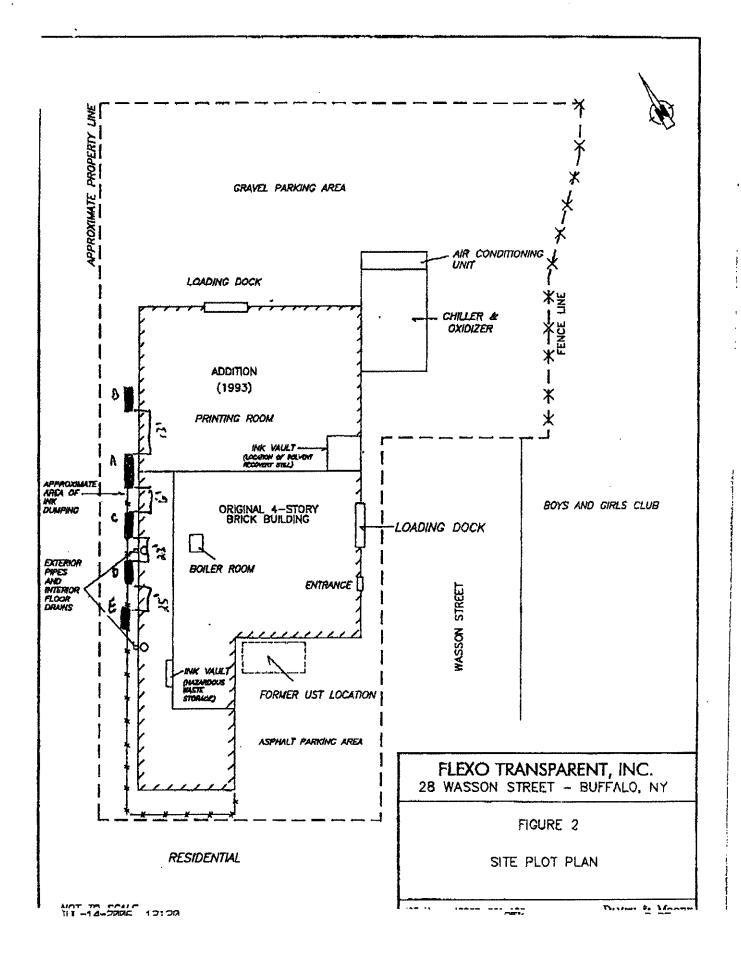
Very truly yours, HAZARD EVALUATIONS, INC.

alle

C. Mark Hanna, CHMM President

Attachments

JUL-17-2005 14:04



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| Analytical Petameter | (A) Sand/Clay Composite | | (B) Material Composite | (E)- (3`-5') Clay Material | Recommended So Cleanup Objective (TAGM 4945) |
|---------------------------|-------------------------------|----------|------------------------------|--|--|
| Bromodichloromethane | | • | | M | NA |
| Bromomethans | | * | * | ų | <u>NA</u> |
| Bromoform | | ч | n | | <u>NA</u> |
| Carbon Tetrachioride | к | | м | P | 600 |
| Chloroethane | IF | N | | | 1,900 |
| Chloromethane | | H | F. | | · · · · · · · · · · · · · · · · · · · |
| 2-Chloroethyl vinyl ether | | đ | 6 | | <u>NA</u> |
| Chloroform | U | π. | | | 300 |
| 1,1-Dichloroethane | н | * | HL | | 200 |
| 1,2-Dichloroethane | , | - | | | |
| 1,1-Dichloroethene | e | | | | 100 |
| Cis-1,2-Dichloroethene | 4 | | | | 400 |
| Trans-1,2-Dichloroethene | | | » | ······································ | <u>NA</u> |
| 1,2-Dichloropropane | 9 | 4 | η [| | 300 |
| Cis-1,3-Dichioropropene | | | H | | <u>NA</u> |
| Trans-1,3-Dichloropropene | ri II | **** | | | |
| Methylene Chloride | e | | n | | |
| 1,1,2,2-Tetrachloroethane | | | | | 100 |
| Tetrachloroethene | | | | | 600 |
| 1,1,1-Trichloroethane | ĸ | | | | 1,400 |
| 1,1,2-Trichioroethane | * | | | | 008 |
| Trichloroethene | н | | | | NA |
| Trichlorofluoromethane | * | | | | 700 |
| Vinyl Chloride | | | | <u> </u> | NA |
| Benzene | | | | | 200 |
| Chlorobenzene | | | | | 60 |
| Ethylbenzene | | | | 4 | 1,700 |
| Toluene | | | · | | 5,500 |
| Xylenes | 31.1 | 21,2 | | | 1,500 |
| Styrene | | <u> </u> | · | | 1,200 |
| 1,2-Dichlorobenzene | | | · | | NA |
| 1.3-Dichlorobenzene | | | | ۴ | 7,900 |
| ,4-Dichlorobenzene | | | | H | 1,600 |
| Cetone | | | əl | e i | 8,500 |
| -Butanone | 89.5 | | 39 | R | 200 |
| Hexanone | | * | | ~ | 300 |
| -Methyl-2-pentanone | | | * | 11 | NA |
| arbon Disulfide | | | 4 | * | 1,000 |
| Inyl acetate | | | N | | 2,700 |
| | USEPA Metho | • | | | NA |

 Results from USEPA Method 8260 for Voiatiles; All results in ppb (ug/kg).
 NA = Not Applicable
 " means compound not detected above Method Detection Limit (MDL).
 Shaded results indicates concentration exceed the TAGM 4046 Standard. Notes:

500,000

(10,000 ____

| | Selected Soil Sample Analytical Results; Semi-volatile Organics 28 Wasson Street, Buffalo, NY June 26, 2006 Sampling Date | | | | | | | |
|--------------------|---|-------------------------------|-----------------------------|------------------------------|---------------------------------|---|--|--|
| sco | Analytical Perameter | (A) Sand/Clay Composite | (A) (0'-4-) Composite | (B) Material Composite | (E) (3'-5') Clay Material | Recommender Soil Cleanup Objective (TAGM 4046) | | |
| | Acenaphthene | | • | - | n | 50,000 | | |
| 50000- | Anthracene | 4 | 490 | 818 | - | 50,000 | | |
| 5600 - | Benzo(a)anthracene | • | 1.010 | 1,250 | - | 224 or MDL | | |
| 1000 | Benzo(a)pyrene | • | 737 | 1,190 | Ħ | 61 or MDL | | |
| 5600 | Benzo(b)fluoranthene | 4 | 494 | 1,030 | * | 1,100 | | |
| Simoni | Benzo(g,h,l)perviene | | 508 | 870 | * | 50,000 | | |
| 56*** | Benzo(k)fluoranthene | u u | 785 | 1,080 | • | 1,100 | | |
| 56,00 | Chrysene | F | 1.000 | 850 | • | 400 | | |
| , | Diethylphthalate | - | | 4 | • | NA | | |
| | Dimethylphthalate | • | 4 | | | 2,000 | | |
| | Butylbenzylphthalate | H | - | = | | 50,000 | | |
| | Di-n-butyiphthalate | | u | • | * | 8,100 | | |
| | Di-n-octyiphthalate | | | H | = | 50,000 | | |
| | bis(2-Ethylhexyl)phthalate | | н | м | " | 50,000 | | |
| | 2-Chloronaphthalene | | | - | | 00,000 | | |
| | Hexachlorbenzene | | | | | 410 | | |
| | Hexachloroethane | * | u u | ¥ *** | | NA | | |
| | Hexachlorocyclopentadiene | ···· | м | | | NA | | |
| | Hexachlorobutadiens | * | - 1 | | | NA | | |
| | n-Nitrosodinpropylamina | · · · | # | • | ···· | NA | | |
| | n-Nitrosodiphenylamine | | | | | NA NA | | |
| | n-Nirosodimethylamine | | * | | | ······ | | |
| | Isophorone | | | | | NA | | |
| | Benzyl alcohol | - | | | | 4,400 | | |
| | Dibenzoturan | | | | | <u>NA</u> | | |
| | 2-Methyinaphthalene | | | | | 6,200 | | |
| | Dibenzo(a,h)anthracene | | | | | 35,400 | | |
| 500,000 - | Fluoranthene | · | | | | 14 or MDL | | |
| | Fluorene | | 2,340 | 3,100 | | 50,000 | | |
| 500, 000 - 5600 | | | | - <u>-</u> | | 50,000 | | |
| | Indeno(1,2,3-cd)pyrene | | 438 | * | | NA | | |
| 500,000 | Naphthalens Phenanthrens | + | | | * | 13,000 | | |
| 500,000 | | <u>+</u> + | 1,990 | 2,470 | | 50,000 | | |
| | Pyrene Notes: 1) Results from USE | | 1,800 | 2,430 | • | 50,000 | | |

Table 2 **Č** • 1

Notes: 1) Results from USEPA Method 8270 for Semi-volatiles; All results in ppb (ug/kg).

2) Shaded results indicates concentration exceeds RSCO.
 3) NA means Not Applicable.
 4) MDL means Method Detection Limit.

5) " means compound not detected above MDL.

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Table 2 (continued) Selected Soil Sample Analytical Results; Semi-volatile Organics 28 Wasson Street, Buffalo, NY June 26, 2006 Sampling Date

| Analyfical Parameter | Sant/Glay Centre 1 | (A) (0-4)) Compositor | (B) Material Composite | (E) (31-5) Clay | Recommended Sol |
|-----------------------------|-----------------------|-----------------------------|------------------------------|--------------------|--|
| Accalipminylene | | | | | apple 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. |
| 1,2-Dichlorobenzene | | | <u> </u> | · | 41,000 |
| 1.3-Dichlorobenzene | - | | | | 7,900 |
| 1,4-Dichlorobenzene | | | | | 1,600 |
| 1,2,4-Trichlorobenzene | | | | | 8,500 |
| Nitrobenzene | | | | | 3,400 |
| 2,4-Dinitrotoluene | | | | | 200 or MDL |
| 2,6-Dinitrotoluene | • | | | | NA |
| bis(2-Chiorosthyl)ether | | | | | 1,000 |
| bis(2-Chloroisopropyl)ether | | | | | NA |
| bis(2-ohloroethoxy)methane | | | • · | | NA |
| 4-Bromophenylphenylether | | | | | NA |
| 4-Chlorophenyiphenylether | | | | | NA |
| Benzidine | 4 | | | · | NA |
| 3,3-Dichlorobenzidine | | | | | NA |
| 4-Chlorozniline | | | | | NA |
| 2-Nitroanaline | | | | | 220 or MDL |
| 3-Nitroaniline | | | | | 430 or MDL |
| 4-Nitroaneline | | | | | 500 or MDL |
| Phenol | | | | | NA |
| 2-Chlorophenol | | | | | 30 or MDL |
| 2,4-Dichlorophenol | | | | | 800 |
| 2,6-Dichloropheno! | | | | | 400 |
| 2,4,5-Trichlorophenol | | | b | | NA |
| 2.4.8-Trichlorophenol | | · | | | 100 |
| Pentachiorophenoi | | | | _ | NA |
| -Chloro-3-methylphenol | | | 8 | | 1,000 or MDL |
| -Methylphenol | | | | | 240 or MDL |
| -Methylphenol | | 624 | • | . • T | 100 or MDL |
| | | | ч | | 900 |
| 4-Dimethylphenol | | 880 | | | NA |
| | • | | | | 330 or MDL |
| Ntrophenol | * | | | | 100 or MDL |
| 4-Dinitrophenol | • | | | н | 200 or MDL |
| 6-Dinitro-2-methylphenol | | • | | н | NA |
| Notes: 1) Results from USER | | н | ч . | — | NA |

Notes: 1) Results from USEPA Method 8270 for Semi-volatiles; All results in ppb (ug/kg). 2) Shaded results indicates concentration exceeds RSCO.

3) NA means Not Applicable.

4) MDL means Mathad Detection Limit.

5) " means compound not detected above MDL.

Table 3 28 Wasson Street, Buffalo, NY June 26, 2006 Sampling Date

Soil Sample Analytical Results; RCRA Metals (Total)

| Anatrical Parameter | (A) Sand/Clay Composite | (A) (0'-4') Composite | (B) Material Composite | (E) (3'-5') Clay Material | Eastern:USA Background Levele. (TAGN: 10-18) |
|------------------------|-------------------------------|-----------------------------|------------------------------|---------------------------------|--|
| Araenic | 5.82 | 1368 × | 治共17 03年81 | 9.01 | 3-12" |
| Barium | 64.8 | 150 | 158 | 97.9 | 15-800 |
| Cadmium | 0.599 | | 4.04 | 0.559 | 0.1-1.0 |
| Chromium | 15.3 | ie auz | 23.8 | 22.2 | 1.5-40 |
| Lead | 18,4 | 467 | 112 | 12.3 | 200-500 |
| Mercury | 0.0439 | 0.0981 | 2010 | 0,0248 | 0.001-0.2 |
| Selenium | • | * | • | | 0.1-3.9 |
| Silver | | | • | | NA |

Notes: 1) All results and Standards expressed in mg/kg.

ŝ

2) * means compound not detected above MDL

3) Shaded results indicates concentration exceeds the TAGM 4046 Standard.

| Analyticat Fareinetter | (A) Sand/Clay Composite | (A) (O'-4') | (B) Material Composite | (E) (3'-5') Clay Material | Hazardous Toxicity Level 3 NYCRR 371 |
|---------------------------|-------------------------------|----------------|------------------------------|---------------------------------|--|
| Arsenic | A | - | 4 | * | 5,0 |
| Barium | 2.85 | 3.11 | 2.35 | 2.83 | 100.0 |
| Cadmium | - | 8 | E | ٩ | 1.0 |
| Chromium | * | • | ¥ | H | 5.0 |
| Lead | • | | 0.132 | u u | 5.0 |
| Mercury | • | • | • | | 0.2 |
| Selenium | * | # | - | | 1.0 |
| Silver | • | * | ₽ | 4 | 5.0 |

Soil Sample Analytical Results; RCRA Metals (TCLP)

Notes: 1) All results and Standards expressed in mg/L

2) " means compound not detected above MDL

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| Table 4 |
|--------------------------------------|
| Soil Sample Analytical Results; PCBs |
| 28 Wasson Street, Buffalo, NY |
| June 26, 2006 Sampling Date |
| |

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| Analytical Parameter | (Å) Sant/Ciay Corriposite | (A) (0'-4') Composite: | (B) Material Composite | Recommended Soll Cleanop Objective (TAGM 4046) |
|-------------------------|--|------------------------------|------------------------------|--|
| Arocior 1018 | 4 | <i>8</i> 4 | 4 | 1.0 |
| Aroclor 1221 | н | ĸ | • | 1,0 |
| Arodor 1232 | И | | n | 1.0 |
| Aroclor 1242 | ų | | • | 1.0 |
| Aroclor 1248 | - | H . | | 1.0 |
| Aroclor 1254 | H | | - | 1.0 |
| Aroclor 1260 | * | • | - | 1.0 |
| Total PCB's | N. N. N. N. N. N. N. N. N. N. N. N. N. N | 4 | 4 | 1.0 |

Notes: 1) All results and Standards expressed in mg/kg.

2) * means compound not detected above MDL
 3) Shaded results indicates concentration exceeds the TAGM 4046 Standard.

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Table 5 Water Sample Analytical Results; Volatile Organics 28 Wasson Street, Buffalo, NY June 26, 2006 Sampling Date

| Analyticat Paramatar | (A) Excavation | Water Guality Standards |
|---------------------------|---|----------------------------|
| | Water | (see notes) |
| Bromodichloromethane | * | 5* |
| Bromomethane | | 5* |
| Bromoform | • | 5* |
| Carbon Tetrachioride | | 5 |
| Chloroethane | • | 50 |
| Chioromethane | • | 5* |
| 2-Chloroethyl vinyl Ether | u . | 5* |
| Chieroform | | 7 |
| 1,1-Dichloroethane | • | 5 |
| 1,2-Dichloroethane | u u | 5 |
| 1,1-Dichloroethene | | 5 |
| Cis-1,2-Dichloroethene | | 5 |
| Trans-1,2-Dichloroethene | 4 | 5 |
| 1.2-Dichloropropana | u u | 1 |
| Cis-1,3-Dichloropropene | • | 5 |
| Trans-1,3-Dichloropropene | 8 | 55 |
| Methylene Chloride | | 5 |
| 1,1,2,2-Tetrachloroethane | н . | 5 |
| Tetrachloroethene | • | 5 |
| 1,1,1-Trichloroethane | * | |
| 1,1,2-Trichloroethane | * | 1 |
| Trichloroethene | | 5 |
| Trichlorofluoromethane | • • · · · · · · · · · · · · · · · · · · | 5* |
| Vinyl Chloride | • | 2 |
| Benzene | a a a a a a a a a a a a a a a a a a a | 1.0 |
| Chlorobenzene | • | 5 |
| Ethylbenzene | + | 5 |
| Toluene | 3.22 | 5 |
| Xyienes | 6.0 | 5 |
| Styrena | н | 5* |
| 1,2-Dichlorobenzene | м | 3 |
| 1,3-Dichiorobenzene | 4 | 3 |
| 1,4-Dichiorobenzene | н | 3 |
| Acetone | 於书】和 在注意于 | 50 |
| 2-Butanone | E0.040 | 50 |
| 2-Hexanone | 35.04 | 5* |
| 4-Methyl-2-pentanone | | 50 |
| Carbon Disulide | ¥ | 50 |
| Vinyl Acetate | • | 5* |

Notes: 1) Results from USEPA Method 8260 for Volatiles; All results In ppb (ug/l). 2) Shaded results exceed the applicable Water Quality Standard.

3) NA means Not Applicable,

4) * means compound not detected above MDL.

5) Water Quality Standards from either TOGS 1.1.1 or TAGM 4046.

8) * = Assumed NYSDEC POC which, if verified, would have a standard of 5 µg/l.

4

| Analytical Parameter: | (A) Excevation | Water Quality Standards (see notes) |
|----------------------------|----------------------|---|
| Acenaphthene | 6 | 20 |
| Anthracene | H | 50 |
| Benzo(a)anthracene | Ĕ | 0.002 |
| Benzo(a)pyrene | | 0.002 |
| Benzo(b)fluoranthene | N | 0.002 |
| Benzo(g,h,l)perylene | M | 5 |
| Benzo(k)fluoranthene | | 0.002 |
| Chrysene | | 0,002 |
| Diethylphthalate | | 50 |
| Dimethylphthalate | • | 50 |
| Butylbenzylphthalate | * | 50 |
| Di-n-butylphthalate | • | 50 |
| Di-n-octylphthalate | # | 50 |
| bis(2-Ethylhexyl)phthalate | 4 | 5 |
| 2-Chloronaphthalene | • | 10 |
| Hexachlorbenzene | al. | 0.04 |
| Hexachloroethane | ų | 5 |
| Hexachlorocyclopentadiene | 11 | 5 |
| Hexachlorobutadiene | 4 | 0.5 |
| n-Nitrosodinpropylamine | 4 | NA |
| n-Nitrosodiphenylamine | 11 | 1 |
| n-Nitrosodimethylamine | 4 | 4 |
| Isophorone | * | 50 |
| Benzyl alcohol | ŧŧ | NA |
| Dibenzofuran | * | 5 |
| 2-Methyinaphthalene | * | 5* |
| Dibenzo(a,h)anthracene | | 50 |
| Fluoranthene | 4 | 50 |
| Fluorena | 4 | 50 |
| indeno(1,2,3-cd)pyrens | na <u>n 1. 1</u> . 1 | 0.002 |
| Naphthaiene | ц. | 10 |
| Phenanthrene | ri | 50 |
| Pyrene | л | 50 |

Table 6Water Sample Analytical Results; Semi-Volatile Organics28 Wasson Street, Buffalo, NYJune 26, 2006 Sampling Date

Notes: 1) Results from USEPA Method 8270 for SVOCs; All results in ppb (ug/I).

2) Shaded results exceed the applicable Water Quality Standard.

3) NA means Not Applicable.

4) * means compound not detected above MDL.

5) Water Quality Standards from either TOGS 1.1.1 or TAGM 4046.

6) * = Assumed NYSDEC POC which, if verified, would have a standard of 5 µg/i.

| Table 6 (continued) |
|---|
| Water Sample Analytical Results; Semi-Volatile Organics |
| 28 Wasson Street, Buttalo, NY |
| June 26, 2006 Sampling Date |

| Analytical Parameter | (A) Excavation Water | Water Quality Standards (see notes) |
|-----------------------------|---|---|
| Acenaphthylene | н — — — — — — — — — — — — — — — — — — — | 20 |
| 1,2-Dichlorobenzene | п | 3 |
| 1,3-Dichlorobenzene | <i>i</i> 1 | 3 |
| 1,4-Dichlorobenzene | 4 | 3 |
| 1,2,4-Trichlorobenzene | 4 | 5 |
| Nitrobenzene | u u | 0,4 |
| 2,4-Dinitrotoluene | N N | 5 |
| 2.6-Dinitrotoluene | 13 | 5 |
| bis(2-Chloroethyl)ether | | 1 |
| bis(2-Chloroisopropyi)ether | * | <u>NA</u> |
| bis(2-chloroethoxy)methane | н | 5 |
| 4-Bromophenylphenylether | | NA |
| 4-Chlorophenylphenylether | h | NA |
| Benzidina | <u> </u> | NA |
| 3,3-Dichlorobenzidine | = | 5 |
| 4-Chloroaniline | q | 5 |
| 2-Nitroanaline | 14 | 5 |
| 3-Nitroaniline | L. | 5 |
| 4-Nitroanaline | 4 | 5 . |
| Phenol | R | 1 |
| 2-Chlorophenol | * | 1 |
| 2,4-Dichlorophenol | 14 | 1 |
| 2,5-Dichlorophenol | | 1 |
| 2,4,5-Trichlorophenol | * | 1 |
| 2,4,6-Trichlorophenol | il . | 1 |
| Pentachlorophenol | e | 1 |
| 4-Chloro-3-methylphenol | | 50 |
| 2-Methylphenol | 198 | 5 |
| 4-Methylphenol | 49.5 | 50 |
| 2,4-Dimethylphenol | 12 | 1 |
| 2-Nitrophenol | N | 5 |
| 4-Nitrophenol | 34 | 5 |
| 2,4-Dinitrophenol | • | 1 |
| 4,6-Dinitro-2-methylphenol | 4 | NA |
| Benzoic acid | * | NA |

Notes: 1) Results from USEPA Method 8270 for SVOCs; All results in ppb (ug/l).

2) Shaded results exceed the applicable Water Quality Standard.

3) NA means Not Applicable.

4) * means compound not detected above MDL.
5) Water Quality Standards from either TOGS 1.1.1 or TAGM 4048.
6) * = Assumed NYSDEC POC which, if verified, would have a standard of 5 µg/l.

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Table 7Water Sample Analytical Results; RCRA Metals - Filtered28 Wasson Street, Buffalo, NYJune 26, 2006 Sampling Date

| Analytical Parameter | (A) Excavation Water | 6N¥CCR 703:6 Groundwater Standards |
|-------------------------|----------------------------|---------------------------------------|
| Arsenic | 22 | 25 |
| Barium | 284 | 1,000 |
| Cadmium | # | 5 |
| Chromium | 4 | 50 |
| Lead | 136 | 25 |
| Mercury | • | 0.7 |
| Selenium | ¥ | 10 |
| Silver | * | 50 |

Notes: 1) All results and Standards expressed in µg/l.

2) " means compound not detected above MDL

3) Shaded results indicate concentration exceeds the NYCCR Title 6, Part 703.6 Groundwater Standards.

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Table 8Groundwater Sample Analytical Results; PCBs3484 S. Union Street, North Chill, NYMay 26, 2006 Sampling Date

and a second second second second second second second second second second second second second second second

| Analytical Parameter | Excavation Water | 6NYGCR 703.6 Gréundwater Standards |
|-------------------------|---------------------|---------------------------------------|
| Aroclor 1015 | 4 | 0.09 |
| Aroclor 1221 | н | 0.09 |
| Aroclar 1232 | " | 0.09 |
| Arocior 1242 | н | 0,09 |
| Aroclor 1248 | at at | 0.09 |
| Arocior 1254 | E9 | 0.09 |
| Aroclor 1260 | | 0.09 |
| Total PCB's | # | 0.09 |

Notes: 1) Results from USEPA Method 8082 PCBs; All results in ppb (ug/l).

2) * means compound not detected above MDL.

3) Shaded results indicate concentration exceeds the NYCCR

Title 6, Part 703.6 Groundwater Standards.

HAZARD EVALUATIONS

HAZARD EVALUATIONS, INC. • 3836 N. BUFFALO ROAD • ORCHARD PARK, NEW YORK 14127 716-667-3130 • FAX 716-667-3156

December 8, 2006

Ronald Mabry, President Flexo Transparent, Inc. 28 Wasson Street Buffalo, New York 14240-0128

Re: Site Remediation; Summary Report

Dear Mr. Mabry:

In accordance with our agreement, dated October 3, 2006, Hazard Evaluations, Inc. (HEI) completed limited remedial activities along the western property boundary of Flexo Transparent, Inc.'s (Flexo) Wasson Street, Buffalo, New York (subject) site. These remedial activities focused on a reported historic release of printing related wastes by a previous operator of the facility, as identified in HEI's Phase II ESA report, dated July 13, 2006. It should be noted that this was a voluntary remedial program performed on behalf of Flexo, and was not mandated by the NYSDEC. A summary of the remedial activities completed at the subject site is provided below.

Prior to any on-site remedial activities, written authorization was obtained from the adjoining property owner to allow HEI to operate on that property and remove any soil impacted with printing related wastes that were encountered. In addition, underground utilities in the area of the remedial activities were located prior to any intrusive activities.

On November 28, 2006 HEI mobilized a tracked excavator to the facility and proceeded to remove soil impacted with paint related material from the ground and load it directly into dump trucks. This waste contaminated soil was transported to the Town of Tonawanda Landfill (NYSDEC Facility #15S29) for disposal (390.64 tons total). The extent of the excavation was determined solely by visual observation of colored soil or ink, given that this waste material did not exhibit discernable volatile organic compounds (VOCs) readings. The depth of the excavation ranged from approximately five feet below grade (bg) adjacent to the building to three feet bg toward the western portion of the excavation. Due to the close proximity of the building wall, excavation was only performed to within a distance of approximately two feet from the building to ensure the structural stability of the wall. As a result, any residual ink encountered was left in-place along the eastern wall of the excavation. HEI's Field Notes are presented in Attachment 1, and present a sketch of the excavation. Backfilling of the excavation was performed using fill generated by on-site construction activities. The waste disposal receipts are presented in Attachment 2.

Five verification samples were collected from within the excavation (three wall samples and two floor samples), and were submitted for laboratory analysis using USEPA Methods 8260 (VOCs) and 8270 (SVOCs), both TCL list and direct analysis, as

well as RCRA metals (direct analysis). All samples were placed in appropriate containers which were labeled, preserved by cooling in the field and handled under chain-of-custody procedures until receipt by a NYSDEC-approved analytical laboratory. It should be noted that only the E. Wall Composite sample was collected on the subject site, as all others were obtained from the adjacent property.

The verification sample laboratory analytical results for VOCs (Table 1, Attachment 3) indicated the presence of one target parameter (Acetone) in three of the five verification samples. Only the E. Wall Composite sample exceeded the applicable NYSDEC Recommended Soil Cleanup Objectives (RSCOs) of 200 μ g/kg, as presented in Appendix A, Table 1 of TAGM HWR-94-4046, dated January 24, 1994 (TAGM 4046). It should be noted that the E. Wall results are substantially below the proposed Soil Cleanup Objective (SCO) of 500,000 μ g/kg for commercial properties, as presented in Table 375-6.8(b) of 6 NYCRR 375-6, due to become effective in January 2007. The Laboratory Analytical Report is presented in Attachment 4.

The verification sample laboratory analytical results for SVOCs (Table 2, Attachment 3) indicated the presence of several target parameters in two of the five verification samples, three of which exceeded their respective RSCOs in the N. Wall sample and two of which exceeded their respective RSCOs in the E. Wall sample. The N. Wall results are also substantially below the proposed Soil Cleanup Objectives (SCOs) of 5,600 μ g/kg, 1,000 μ g/kg and 56,000 μ g/kg for commercial properties [respectively for Benzo(a)anthracene, Benzo(a)pyrene and Chrysene], as presented in Table 375-6.8(b) of 6 NYCRR 375-6. No SCOs were even developed for the Methylphenol parameters detected in the E. Wall sample.

The verification sample laboratory analytical results for the RCRA metals (Table 3, Attachment 3) indicated the presence of several target parameters in two of the five verification samples which exceeded the Eastern USA Background Levels as presented in TAGM 4046. Of significance for metals contaminants, the TAGM 4046 levels are not clean-up objectives, but rather represent common levels encountered in uncontaminated soils located across the eastern United States. It should be noted that the S. Wall results are all below the proposed Soil Cleanup Objectives (SCO) of 16 mg/kg, 8 mg/kg and 1,500 mg/kg for commercial properties (respectively for Arsenic, Mercury and Selenium), as presented in Table 375-6.8(b) of 6 NYCRR 375-6. Similarly, the N. Wall results for Chromium (SCO = 1,500 mg/kg), Mercury and Selenium are all below the applicable SCOs.

Based on the remedial activities performed and the verification sampling results obtained, HEI suggests that the remediation of the printing related wastes along the western boundary of the subject site have been adequately completed. It is likely that the residual Acetone detected in the eastern excavation wall may be related to the historic release of printing related wastes; however, the level detected is significantly below the proposed commercial property soil clean-up objective that becomes effective early in 2007. The SVOCs detected in the E. Wall sample that exceeded the RSCOs are unlikely to be related to the historic release of printing related wastes, but are more likely to reflect the historic presence of a railroad line that once ran along the western property boundary. As indicated above, no SCOs have even been proposed for these two compounds in the new regulations for commercial property clean-ups. No metals were detected in the E. Wall sample that exceeded background levels. As a result of this limited remedial program, HEI suggests that no further investigative or remedial activities are warranted.

The information presented above should adequately summarize HEI's remedial efforts at the subject site. If you have any questions regarding the content of this letter report or its attachments, please contact me directly.

Very truly yours, HAZARD EVALUATJONS, INC.

C. Mark Hanna^V, CHMM President

Attachments 23403\Flexo#1\Remediation\RemedSummRpt 121206

Attachment 1

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Attachment 2

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| 「「「「「「」」」というない。 | | WASTE MANIFEST | B/A | | 715- | 285-392 | | - | 5-374891 |
| 2 | | enerator's Name and Maillr | | | merator's Site Addres | | - | iress) | |
| | | | arent, , 28 Wasson Street, | | Flemo Tran | sparent, | , 28 | Wasson | Street, , |
| | | | 4246, Romald Mabry | I | Buffalo XY | 14240, | Ronald | Habry | |
| | 8. Tr | ansoorter 1 Company Nam | 718-525-7710 | | | | U.S. EPA ID | | |
| | ÌÌ | Jarica Trial | 109 575-5168 | | | I | | A 035 | |
| | 7. Tr | aneporter 2 Company Nam | 10 - 21 0 F | | | | U.S. EPA ID | | · · · · · · · · · · · · · · · · · · · |
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| | 6. De | signated Facility Name and | d Ste Address Wande Landfill Closure | | | | U.S. EPA ID | | |
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| | | Fonswanda XY | 716 856 3633 | | | , | | | |
| | | ity's Phone: | 715-255-3920 n (Including Proper Shipping Name, Hazard Clase, ID Number, | | | | | | |
| al any real fights. ATOR | HM | and Packing Group (If an | n (inclouing Proper Shipping Name, Hazard Class, ID Number, iy)) | | 10. Conta No. | клега Туре | 11. Total Quantity | 12. Unit WL/Vol. | |
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| a state of the sta | | | statt: Ensol, Inc. Nick: | Horraela | | 17 m 2 m/m m | | | KID |
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| | 14. GE | ENERATOR'S CERTIFICAT | TION: I certify the materials described above on this manifest | | | reporting proper | disposal of H | azardous Wa | iste. |
| | | ator's Offeror's Printed Type | He on behalf of Flore Trange | | 24 | 7 | | | Month Day Year |
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| äÈ, | 17b. Al | ternate Facility (or Generate | or) | | | | J.S. EPA ID I | n r≁ √umber | 1.5.21 |
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| | | | perator: Certification of receipt of hazardous materials covere | d by the manifest e | except as noted in Iten | y 17a | | <u>n na serie na serie na serie na serie na serie na serie na serie na serie na serie na serie na serie na serie n Na serie na s</u> | <u>* 1400 (1995) 181, 665 (1976) - 40, 60 (</u> 7 |
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| | [| NON-HAZARDOUS | 1. Generator ID Nt | umber | 2. Page 1 of | 3. Emerge | ncy Response | e Phone | 4. Weste T | racking Nu | mber | | |
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| | 5.0 | Generator's Name and Mallin | ng Address | 28 Tasson Street, | Generator's Site Address (if different than ma | | | | mailing address) 、 28 Wasson Street、 、 | | | | |
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| Z I | | | 716 | 5-825-7710 | 1 | 1 | | | | | | | |
| | | nerator's Phone: Transporter, 1-Company, Nam | | | | | | | U.S. EPA ID | Number | | | |
| | 0.1 | 716-375-5155 | | | | | | | | | 7 | | |
| | 7.1 | Transporter 2 Company Nam | | | | | | | U.S. EPA ID | Number | | | |
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| | 8 . E | Assignated Facility Name an | d Site Address | ndfill Closure | | | | | U.S. EPA ID | Number al / A | | | |
| | | East Park Ro | ad | | | | | | | | | | , |
| | | Tonawanda BY | 1 | 716-265-392 | a | | | | 1 | | | | |
| | | Bity's Phone: | - 6 | | | r | 10, Cont | ainers | 11. Total | 12. Unit | <u></u> | | |
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| GENERAL STRUCTURE CONTRACTOR STRUCTURES STRUCTURES | | | | | | | | | | | | | |
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| | 10 | Special Handling Instruction | na and Additional In | formation | | | | . | | | 2.20 - 192 | | 9. starte |
| | 13. | Energency Co | NERCECCI Sectecci | Ensol, Inc. Nick | Morres | 1e | | Weight | : Ticke | t No. | 1/4 | 1741 | |
| | | Endel, Inc. | Fro <u>țer⇒</u> | ID Number: 05-375 | 9-12T | | | | Weight | | por | 421 | 2 |
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| | | | | materials described above on this manife | | ct to federal gnatur | regulations f | r reporting prope | ar disposal of H | lazardous V | Vaste. Month | | |
| | GBI | repator's/Offeror's Printed/Ty | | / Flexo Transport | | Strain St | not | <u> </u> | <u>_ ר</u> | | | Day | year Ob |
| | 15. | International Shipments | | · · · · | | <u> </u> | | | <u> </u> | | | | 00 |
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| | | | | Accust Weight 4 | <u>8.2</u> ~ | - Manife | st Reference | Number: | | | 4582 | | |
| È | 17b | . Atternate Facility (or Gener | nator) | | | | | | U.S. EPA ID | Number | | | |
| FACILITY | | | | | | | | | 1 | | | | |
| Ð F | | lity's Phone: . Signature of Alternate Facil | lity (or Generator) | | | | | - ··· | | | Month | Day | Year |
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| Section 2. Secti | | | v Operator: Certifica | ition of receipt of hazardous materials co | | | Las noted in I | tom 17a | <u> </u> | - <i>^</i> > | 14 | | |
| | Prin | led/Typed Name | ont. | Kood | Si I | | . , + | | 1/. | V. | Month | ^{Day} らど। | $\mathcal{O}_{\mathcal{L}}$ |
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| Ĩ | Ĺ | WASTE MANIFEST | Ø/A | | L | | 285-3920 | 1 | | 5-374584 | | |
| | ; | 5. Generator's Name and Mailin | ngAddress Arent, . 23 Wasson Street, | | | | : (li different than | - | • | a | | |
| | | • | 4240, Ronald Mabry | | | | | | | Soreet, . | | |
| | | 715-875-7710 | | | | | | | | | | |
| | Generator's Phone: | | | | | | | | | | | |
| | CA DES | | | | | | | | | | | |
| | 715-875-5168 FR 625 | | | | | | | | | | | |
| | 7. Transporter 2 Company Name U.S. EPA ID Number | | | | | | | | | | | |
| | R. Designated Eacility Name and Site Address U.S. EPA ID Number | | | | | | | | | | | |
| | | 8. Designated Facility Name and 1 January Dr. 1 January | d She Address wanda Landfill Closure | | | | | U.S. EPA ID | Number N/A | | | |
| | | East Bark Bo | a d | | | | | | | | | |
| | Tortawanda NY | | | | | | | | | | | |
| | | Facility's Phone: | 715-285-3920 | | · . | | I | | | | | |
| | | | n (including Proper Shipping Name, Hazard Class, ID Number, | | Ļ | 10. Conta No. | | 11. Tobel Quantity | 12. Unit WL/VoL | | | |
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| а. Р | | | | | | | | | | | an mane | |
| | | 13. Special Handling Instruction | ns and Additional Information Destact: Ensel, Inc. Nick: | Morree | . . | | Weight | | | 1512 | 11 | |
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| | | | I. · · · | | | | , , , | | | 17.5 | 58,00 | |
| | - | - | ATION: I certify the materials described above on this manifest | are not subject | 1. free | at regulations for | moorfing proper | disposal of i | Hazamous W | | | |
| | | Generator's/Offeror's Printed/Ty | | Sk | hatur | | 1 | | | | Day Year | |
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| | 2 | 15. International Shipmedia | | Export from | | Port of er | | | | | | |
| | | Transporter Signature (for expor | Implifier tofU.S. | s capore nom | 0.0. | Date leav | | | | | | |
| - C | - | 16. Transporter Acknowledgmer | nt of Receipt of Materials | | | <u> </u> | | | | | | |
| TRANSPORTER | | Transporter 1 Printed/Typed Nat | me | 91 | pature | 1 | | | | Month | Day Year | |
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| ANA | | Transporter 2 Printed/Typed Na | me · | Siç | mature | | | | | Month | Day Year | |
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| i k | | 17. Discrepancy | | | · | | | _ | | | | |
| | | 17a. Discrepancy Indication Spa | ace Quantity Type | | _ Γ | Residue | [| Partial R | ejection | 🗌 Ful | Rejection | |
| | | Item 813 Eat | imated. Actual Weight = / | 158 | ン | | | | | | | |
| | $\left \right $ | 17b. Alternate Facility (or Gener | | | Man | Ifest Reference | Number | U.S. EPA ID | | 4284 | | |
| Ē | | TO D. PROTINGE FACILITY (OF CHEREN | | | | | | | | | | |
| FACILITY | | C- Altria Ohana- | | | | | I | | | | | |
| | | Facility's Phone: t7c. Signature of Alternate Facil | lity (or Generator) | _ | | | | | | Month | Day Year | |
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| | | 18. Designated Facility Owner o | r Operator: Certification of receipt of hazardous materials cove | red by the ma | nifest exce | apt as noted in H | em 17a | | | | | |
| | | Printed/Typed Name | 10 (| | nature | 24 | - 1 | $\overline{\Lambda}$ | 1 | Month | Day Year | |
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| NON-HAZARDOUS 1. Generator ID Number WASTE MANIFEST | 2. Page 1 of 3. Ел | | | 4. Waste T | - | |
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| 5. Generator's Name and Mailing Address | Gane | rator's Site Address | 2 8 3 - 3 9 1 (If different th | | | 5-314533 |
| Flamo Transparent, , 28 Wasson Street, | · · Ē | lemo Iran | sparent | , , 28 9 | Vasson | Street, , |
| Buffalo NY 14140, Ronald Mabry | | affalo WY | - | | | |
| Generator's Phone: /18-828-7710 | <u> </u> | | | | | |
| 6. Transporter 1 Company Name | | | | U.S. EPA ID | | |
| Pariso Trucking | | | | - | A 035 | |
| 7. Transporter 2 Company Name | | | | U.S. EPA ID | Number | |
| | | | | U.S. EPA ID | Number | |
| 8. Designated Facility Name and Site Address Town of Tonawanda Landfill Closure | | | | | N/A | |
| East Park Road | | | | | | |
| Tonawanda NY Facility Processor 718-285-393 | 20 | | | 1 | | |
| | | 10, Cont | ainers | 11. Total | t2. Unit | |
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| Soil (PCS), , , | | Į | | | | |
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| 4. | | | | | | |
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| 13. Special Handling Instructions and Additional Information | · · · · · · · · · · · · · · · · · · · | <u> </u> | 1 . <u> </u> | · | 1 | |
| Emergency Contast: Ensol, Inc. Nich | | | | t Ticke | | 15120 |
| Endel, Inc. Frajer ID Number: 05-32 | 259-12T | | | Vaight | | 72350 |
| Truck ID: 1-3A-4-23 | | | Tare | Weight: | | 0,000 |
| Truck Lie .: 322455 | İ | | * 1 T | + | ON | \$ 23.68 |
| Handling Codee: | | | | | | |
| 14. GENERATOR'S CERTIFICATION: I certify the materials described above on this man | atest are not subject to te Signation | deral regulations in | r reporting prop | oer oesposal or i | Hazaroous v | Month Day Y |
| Separator's printed Typed Name Soft Verhyll on behalf of Flexo Transport | | | $1 \frown$ | | | 11/24/0 |
| | | | | \sim | | |
| Transporter Signature (for exports only): | Export from U.S. | | ntry/extt: ving U.S.: | | | |
| | | 11 | 1. | | | |
| Transporter 1 Printed/Typed Name | Signatur | 1110 | η | | | Month Day Y |
| SohnColl | | Yoh 1 | K~ | | | 11 28 0 |
| 16. Transporter Acknowledgment of Hecelpt of Materials Transporter 1 Printed/Typed Name Transporter 2 Printed/Typed Name | Signatur | | | | | Month Day Y |
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| AZ Diserverse | | | | | - | |
| 17. Discrepancy | | Residue | | Partial R | ejection | Full Rejection |
| 17a. Discrepancy Indication Space Quantity Type | | L Meskule | | | | |
| | 77/0 | | Number | | . т , | 11595 |
| 17a. Discrepancy Indication Space Quantity Type Item #13 Estimated. Actual Saight = | 77/0 | Aantiest Reference | Number: | U.S. EPA IC | | 74833 |
| 17a. Discrepancy Indication Space Quantity Type Item #13 Estimated. Actual Seight = | 77/0 | | Number: | U.S. EPA ID | | 1933 |
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| 17a. Discrepancy Indication Space Quantity Type Item #13 Estimated. Actual Seight = | 77/0 | | Number: | U.S. EPA IC | | |
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| 17a. Discrepancy Indication Space Quantity Type Item #13 Estimated. Actual Saight = | 77/0 | | Number: | U.S. EPA IC | | |
| 17a. Discrepancy Indication Space Quantity Type Item #15 Estimated. Actual Seight = 17b. Alternate Facility (or Generator) Facility's Phone: | 77/0 | | Number: | U.S. EPA IC | | · · · · · · |
| 17a. Discrepancy Indication Space Quantity Type Item #13 Estimated Actual Scight = 17b. Alternate Facility (or Generator) Facility's Phone: 17c. Signature of Alternate Facility (or Generator) | 23 <u>68</u> | Aanifest Reference | | U.S. EPA IE | | · · · · · · |
| 17a. Discrepancy Indication Space Quantity Type Item #13 Estimated Actual Seight = 17b. Alternate Facility (or Generator) Facility's Phone: 17c. Signature of Alternate Facility (or Generator) 18. Designated Facility Symmer or Operator: Certification of receipt of hazardous materials of the second symmetry of the second symmetr | 23.68 | Aanifest Reference | | U.S. EPAIL | | Month Day Y |
| 17a. Discrepancy Indication Space Quantity Type Item #13 Estimated Actual Scight = 17b. Alternate Facility (or Generator) Facility's Phone: 17c. Signature of Alternate Facility (or Generator) | 23 <u>68</u> | Aanifest Reference | | U.S. EPAIL | | Month Day Y |

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| 8 ↑ | | WASTE MANIFEST | ¥/A | | | | 235-3 | 285-392 | 1 | E | 9-374685 | |
| | 5 | 5. Generator's Name and Mails | ng Address | | | Generator | 's Site Address | (if different th | an mailing addr | ess) | | |
| | | - | arent, , 28 Warson S | treet, | , | Fles | eo Trans | spazent | , 23 9 | (Lesson | Street, . | |
| | ſ | Suffalo NY 1 | 4240, Ronald Mabry | | | 8 a £ i | Ealo WY | 14240, | Ronald | Mabry | | |
| | 10 | Generator's Phone: | 716-825-9710 | | | | | | | - | | |
| | | 6. Transporter t Company Nan | ne | | | | | | U.S. EPA ID | Number | | |
| - | | Pariso Truck | cing .875 | | | | | | 9 | A 035 | | - |
| | 7 | 7. Transporter 2 Company Narr | ne | | | | | | U.S. EPA ID | Number | | |
| | | | | | | | | | [| | | |
| | 8 | 3. Designated Facility Name an | nd Site Address Avranda Landfill Closu | | | | | | U.S. EPA ID | | | |
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| | 8. Designated Facil | iy Name ar | nd Site Address | ill Elneura | | | | | U.S. EPA ID | Number S/A | | | 100 |
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| | Tonawar | | | | | | | | | | | | 2 Martine Carlo |
| | Facility's Phone: | | | 716-255-3920 | | | | | | | | | |
| ATOR | 9a. 9b. U.S. DO HMI and Packing | | | g Name, Hazard Class, ID Number, | | | 10. Cont No. | | 11. Total Quantity | 12. Unit Wt./Vol. | | | |
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| È | 17b. Alternate Facili | ty (or Gene | rator) | | | | | | U.S. EPA ID | Number | | | |
| FACILITY | | | | | | | | | 1 | | | | 10.10 |
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| | | | or Operator: Certification of r | eceipt of hazardous materials cover | | | as noted in It | em 17a, | | | 1 | | |
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| | | NON-HAZARDOUS | 1. Generator ID Nun | nber | 2. Page 1 of | 3. Emerg | ency Response | Phone | 4. Waste T | racking Nur | mber |
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| 鬣T | WASTE MANIFEST N/A 715-285-3920 ES-374689 | | | | | | | | 5-374689 | | |
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| ŝ | | erator's Phone: | | -325-7710 | | | | | U.S. EPA ID | 61 | |
| | | ransporter 1 Company Nam Bariso Truck | | | | | | ı | | Number A 035 | |
| \$ | L | 716 | <u>.8756138</u> | | | | | | U.S. EPA ID | | |
| - 2 | /. | ransporter 2 Company Nan | ne | | | | | I | 0.3. EFA ID | | |
| | | esigneted Facility Name an | d Site Address | | | | | | U.S. EPA ID | Number | |
| 2 | 0.0 | Town of Tone | manda Laa | dfill Closure | | | | | | N/A | |
| | | Eest Park Ro | ad | | | | | | | | |
| | | Tonawanda 82 Sily's Phone: | [| 716-265-3920 | | | | | | | |
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| 1 | 13. | Special Handling Instruction | | | | - | | | | | 75133 |
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| FAC | Faci | lity's Phone: | | | | | | | | | |
| و ^ي ته | 17c. | Signature of Alternate Fec | ility (or Generator) | | | | | | | | Month Day Year |
| DESIGNATED FACILITY | | | | · · · · · · · · · · · · · · · · · · · | | | | | | | |
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| | | Designated Facility Owner (| | on or receipt or nazaroous maginais cove | | mest exce | | | ~/ | (/ | Month, Day, Year |
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| | T | NON-HAZARDOUS | 1. Generator ID Number | | 2. Page 1 of | 3. Emerge | ancy Response | e Phone | 4. Waste T | meking Nu | mber | | |
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| | | WASTE MANIFEST | | 4/A | | | | 285-39 | | | 8-37469/ | 3 | |
| | 5 | i. Generator's Name and Mailin デオテルコープアクロック | | Wasson Straat, | | | | | han mailing addr | | <i></i> | | |
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| 4 (A) 4 | | enerator's Phone: Transporter t Company Narr | | | | | | | U.S. EPA ID | Number | - | <u> </u> | , |
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| | 6 | Designated Facility Name an | d Site Address | ill Closure | | | | | U.S. EPA ID | Number N/A | | | |
| Ž. | | Eest Park Ro | | | | | | | | ** ; ** | | | |
| 5 | | Tonawanda SI | : | | | | | | 1 | | | | |
| | | acility's Phone: | | 715-265-3926 | | | 10. Coat | -7 | | T | | | |
| | 1.1 | a. 9b. U.S. DOT Description | | ng Name, Hazard Class, ID Number, | | · - | 10. Conta No. | almens Type | 11. Total Quantity | 12. Unit WL/Vol. | | | |
| 9 | | | | . Regulated Hate | rial - | 1074 | 001 | | Ganay | 77 | | - জিকান্য | শিষ্ঠির |
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| | | | | als described above on this manifest | are not subject | to federal : | egulations for | reporting pro | per disposal of H | azardous W | laste. | | |
| į, | G | emerator's/Offeror's Printed/Typ | ped Name | | _ \$igr | nature / | , D | ~7 | | | Month | Day | Year |
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| INT'L | | 5. International Shipments | tmport to U.S. | L | Export from U | l.S. | Port of er | | | | | | |
| | 1 | ransporter Signature (for expor 5. Transporter Acknowledgmen | | | | | Date leav | ing U.S.: | -7 | | | | |
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| 7.≻ | 17 | b. Alternate Facility (or Genera | ator) | | • • • | 141011110 | | ternoet. | U.S. EPA ID | | 4890 | | |
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| E A | F | acility's Phone: | | | | | | | | | | | |
| DESIGNATED FACILITY | 17 | c. Signature of Alternate Facili | ity (or Generator) | | 1 | | | | | | Month | Day | Year |
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| 12 | 18 | . Designated Facility Owner or | Operator: Certification of | receipt of hazardous matelials cover | red by the man | fest except | as noted in its | em 17a | | | <u></u> | <u>- 11770 - 6</u> | <u></u> |
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| | Τ | NON-HAZARDOUS | 1. Generator ID Number | 2. Page 1 of | e 1 of 3. Emergency Response Phone | | | 4. Waste T | racking Nu | mber |
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| 8 T | L | WASTE MANIFEST | N/A | | Ļ | 715-3 | 185-392 | 1 | <u> </u> | 5-374591 |
| 5 | 1 | 5. Generator's Name and Mally | | | | | (If different than | - | | _ |
| | | - | parent, , 28 Wasson Street, . | 4 | | | - | | | Streer, , |
| | | | 4240, Ronald Mabry | | 2ufi | Ealo IY | 14240, | Ronald | Mabry | |
| | | | 215-825-7710 | | | | | U.S. EPA D | himber | |
| | 1 | 6. Transporter 1 Company Nan Pariso Truch | | | | | 1 | | A 035 | |
| | | 7. Transporter 2 Company Nan | <u>-275-5158</u> | | | | | U.S. EPA JD | | |
| | | 7. Fransponer 2 Company Ivan | ne | | | | | 0.0, 1177.0 | | |
| | H | 6. Designated Facility Name an | od Site Address | | | | } | U.S. EPA D | Number | |
| | | Town of Tons | awanda Landfill Closure | | | | | | N/A | |
| 2 | | East Park Ro | ead | | | | | | | |
| 1 | | Tonawanda NY Facility's Phone: | 7 716-285- <u>3920</u> | | | | | | | |
| | F | | on (including Proper Shipping Name, Hazard Class, ID Number, | | | 10. Conta | irxers | 11. Total | 12. Unit | |
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| | | <u>Truck Lic.:</u> | JASSEPA M | | | | 1 1 7 | | | 0 1 |
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| 1300 UCC | | 14. GENERATOR'S CERTIFIC Generator's/Offeror's Printed/Ty | CATION: I certify the materials described above on this manifest a | | nature | requerons for | | resposatorr | Hazaroous v | Month Day Year |
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| | + | Transporter Signature (for expo 16. Transporter Acknowledgme | | <u>.</u> | | <u></u> | | | | |
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| | | 17. Discrepancy | | | | | | | | |
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| | | | | - 0 | ∖ Manife | est Reference I | Numbert | U.S. EPA ID | | 4501 |
| | | 175. Alternate Facility (or Gene | BPAICK / | | | | | 0.0. CFA ID | 1141160 | |
| DESIGNATED FACILITY | | | | | | | I | | | |
| | ŀ | Facility's Phone: 17c. Signature of Alternate Fac | Hity (or Geografor) | | | | | | | Month Day Year |
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| | F | 18. Designated Facility Owner of | or Operator: Certification of receipt of hazardous materials cover | ed by the mar | ilfest excep | t as noted in It | em 17a | | a | 1 |
| 8 | | Printed/Typed Name | | | mature | < _ | TI, | -11 | | Month Day Year |
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| | NON-HAZARDOUS | 1. Generator ID Number | 2. Page 1 of | 3. Emergency F | Response l | Phone | 4. Waste T | nacking Nur | mber | | |
|--|--|--|---|---------------------------|--------------|--|----------------------|--|---|---|------------------|
| | | | | | | 85-392 | | | 9-374897 | | |
| | 5. Generator's Name and Mail | | | Generator's Site | Address | (if different that | n mailing addr | ess) | | | |
| | - | arent, , 28 Kesson Street. | ÷ | Flemo | Irans | parent, | , 28 7 | l isson | Streat, | | |
| | Buffelo WT 1 | 4240, Ronald Mabry | | Buffal | o WY | 14240, | Ronald | Mabry | | | |
| | Generator's Phone: | 715-825-7710 | 1 | | | | | | | | |
| 劉 | | ne | | | | ····· | U.S. EPA ID | Number | | | |
| 8 | 6. Transporter 1 Company Nar Fariso fruct | cing -875-5168 | | | | 1 | 9 | A 035 | | | |
| Ň | 7. Transporter 2 Company Nan | -0/0 17290 | | · • • • • | | I | U.S. EPA ID | Number | | | |
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| 劉] | ./ | | Quantity Type | | L | Residue | | Partial Re | ejection | Full Rejection |
| | 1 | ltem #13 Es | timated. Actual Weight = 🥤 | n u | 7 | initest Reference | h) | | | |
| 圏し | 17h 4 | Alternate Facility (or Gene | erator) | 50.1 | <u> </u> | innest Heterence | NUTIDEL | U.S. EPA ID | | 1 <u>46335.</u> |
| ŝ | | | | | | | | | | |
| ACI | | | | | | | | 1 | | |
| E C | | y's Phone: Signature of Alternate Fac | sility (or Generator) | | | | | | | Month Day Year |
| ATE | | ignature et raternate rat | | 1 | | | | | | |
| N N | 102.000 | | | | | - All grade de | | | | |
| DESIGNATED FACILITY | | | | ر المعلمي والمرضى وما م مراسطة المرضي وما م | | | | | ار در می کرد کرد. مرکز از می کرد کرد کرد مرکز از می کرد کرد کرد کرد | |
| | | | | | | | | | | |
| ▲ DESIGNATED FACILITY DESIGNATED FACILITY | | New Control Control Control | or Operator: Certification of receipt of hazardous materials cove | nad by the me | inifect or | cont ac noted in t | iem 17a | | <u>1913 (1917)</u> | 가지 두 편하는 것이 가지가 것이 않는 또 한다는 것이다. |
| | | d/Typed Name | | | ignature | | | N | | Month Day Year |
| 鬣↓ | | | Fent Reed | | 15 | JOT | 11 - | Ku | K | 11 UDA |
| <u>8</u> | L | | V-4/ vest | | | mai | ~ | | | |

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| | | | | | | | | ··• |
|---|---|--|-------------------------|------------------------------------|----------------|----------------------------|--------------------------|--|
| NON-HAZARDOUS | 1. Generator ID Number | 2. | Page 1 of 3. Emerg | ency Response | Phone | 4. Waste T | racking Nu | nber |
| WASTE MANIFEST | 37/3 | | 1 | 716-3 | 185-39 | 25 | Σť | 5-374595 |
| | | | Generatir | | | han malling addr | | |
| 5. Generator's Name and M | Hing Address parent, , 28 Wasson : | 24 | | | • | - | | Street, . |
| | | , , , , , , , , , , , , , , , , , , , | | | | | | |
| Buffalo MY | 14240, Bonald Habry | | Brsi | Salo Wi | 14240, | . Xonald | Hapila | |
| | 716-825-7710 | | 1 | | | | | |
| Generator's Phone: | | | l | | | U.S. EPA ID | Alt-the | |
| 6. Transporter 1 Company | | | | | | | | |
| 24/ 232/232 2223 | 1-875-6153 | | | | | 1 1 | a 035 | |
| 7. Transporter 2 Company N | -013-020C | | | | | U.S. EPA ID | Number | · · · · · |
| 7. Transporter 2 Company n | ane | | | | | 1 | | |
| | | | | | | | | |
| 6. Designated Facility Name | and Site Address Iawanda Landfill Clos | | | | | U.S. EPA ID | | |
| Town of los | awanda Landfill Clos | ute | | | | | IJ∕A | |
| East Fark | load | | | | | | | |
| Tonawanda B | IY | | | | | 1 | | |
| Facisty's Phone: | 716-3 | 285-3920 | | | | | | |
| | bilon (including Proper Shipping Name, Hazard (| Class ID Number | | 10. Cont | uners | 11. Total | 12. Unit | |
| | | | | No. | Туре | Quantity | WL/Vol | |
| HM and Packing Group (| | | | INU. | 11/10 | | | a fine of the second second second second second second second second second second second second second second |
| 1. Bon RES | A, Son D.O.T. Regula | ted Mater | ial, ASM | 001 | T | l · | T | |
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| Soil (E | C3), , , | | 1 | | | | | |
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| 2. , , , , | | | | | 1 | | | |
| , , , , , | | | | | | 1 | | Street and a street store |
| | | | ļ | | | 1 | 1 | |
| | | <u> </u> | | | _ | <u> </u> | _ ····· | |
| 3. | | | | | 1 | | | 1997 - 1998 - 1995 - 1995 - 1995 - 1995 - 1995 - 1995 - 1995 - 1995 - 1995 - 1995 - 1995 - 1995 - 1995 - 1995 - |
| 0. 2 2 2 | | | | | | 1 | | |
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| 4. | | | | | | <u>.</u> | | |
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| | | | | | 1 | 1 | | and the second second second second second second second second second second second second second second second |
| | | | | | | | | the second second in the second second second second |
| 13. Special Handling Instru | ctions and Additional Information | | | | | | | DELEL |
| Emergency | Controt: Ensol, In | c. Nick M | iorreale | | · 제작소광 | ht Ticke | st No. | 7515 |
| | . Frageat II Number: | 05_3950 | - 77 | | Groe | s Weight | 5: | 71880 |
| | | | | | | - | | 87292 |
| Truck ID: | 163 | | | | 1924 | Meigst | | |
| Tryck Lic. | 37848PA | r Nt | } | | г., | , | | |
| Heraking Cades | | , | | | | | | |
| | | ļ | | \ > | | | | |
| 14. GENERATOR'S CERT | FICATION: I certify the materials described abo | ve on this manifest a | re not subject to feder | al regulations to | r reporting pr | oper disposal of | Hazardous | Waste. |
| Generator's/Offerer's Printe | styped Name | - | Siggature / | TX | | | | Month Day Ye |
| | 10 Lillalda T | , NI A L | $ \alpha\rangle$ | $\sqrt{1}$ | | _ | | 11 28 01 |
| W # Unh/ | 1 on berry of rillyo Im | spher | | <u> //// </u> | | | | |
| 15. International Shipment Transporter Signature (for e | Import to U.S. | | Export from U.S. | Port of e | ntry/exit | | | |
| | | | | | ving U.S.: | | | |
| Transporter Signature (for e | xports oney): | | | 100 01010 | | | | |
| 16. Transporter Acknowled | ment of Receipt of Materials | | | | | | | La consta da seconda da seconda da seconda da seconda da seconda da seconda da seconda da seconda da seconda d |
| Transporter 1 Printed/Type | Name | | Signature | 1 | | | - | Montin Day Yi |
| An n | for Catarele | | 1 / 4 | | | | | 11 29/6 |
| JANC | | | Signature | · ··· · | • | | | Month Day Ye |
| Transporter 2 Printed/Type | 1 Name | | ្ទាំងការណ៍ | | | | | (1 I |
| 16. Transporter Acknowled Transporter 1 Printed/Type 56 | | | 1 | | | | | |
| 17 Disconcert | ···· | | ···· | | | | | |
| 17. Discrepancy | | | | | | | | |
| 17a. Discrepancy Indication | Space Quantity | 🗔 туре | | Residue | | Partial P | lejection | Full Rejection |
| | • | | - יד- ר | | | | · | |
| Iton #13 E | stimated. Actual We | tant = L | ト・うみ | nifest Reference | Alumba- | | 3 | 74396 |
| | | | Ma | nnest meterence | NUMBER | | | 14478 |
| 17b. Alternate Facility (or G | enerator) | | | | | U.S. EPA I | | |
| | | | | | | | | |
| 1 | | | | | | 1 | | |
| Facility's Phone: | | <u></u> | | | | | | Marth Day V |
| 17c. Signature of Alternate | Facility (or Generator) | | | | | | | Month Day Y |
| | | | | | | | | |
| | and the state of the state of the state of the state of the state of the state of the state of the state of the | | | به کافیان بن ازین واقعه | la forma i e | - Alter (1995) (1986) | | i - Harris Harris - Angel - Angel - Angel - Angel - Angel - Angel - Angel - Angel - Angel - Angel - Angel - Ang |
| | | Service and the service of the servi | | | | 计输行 副部 | | |
| 17c. Signature of Atternate | | | | يستنها ويراجع | | 经济管理学 | | 这些中国的"APP"的时代 |
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| and the second states where | | an ann an an an an an an an an an an an | <u> </u> | 2 . <u>5</u> . 2 . 4 | | <u></u> | 2017 - 16. | <u>, secondo en contra de proventes</u> |
| 18. Designated Facility Ow | ner or Operator: Certification of receipt of hazard | jous materials covere | id by the manifest exc | cept as noted in | tem 17a | | | |
| Printed/Typed Narre | | | Signature | 2 1 | -/ | N | | Month Day Y |
| | | | | | · · · · · | | / | |
| | at Park | | | | 4/ | X X | | |
| 1 Sr | ent Keed | | -17 | ust. | λ . | Kuk | - | 11 48 24 |

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Attachment 3

Laboratory Analytical Summary Tables

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Table 1 Selected Soil Sample Analytical Results; TCL Volatile Organics November 28, 2006 Sampling Date

| Analytical | | N. Wall | 🗻 E. Wall 🔆 | Floot A | Floor B | Recommended Soil Cleanup |
|---------------------------|-----------|-----------|-------------|-----------|----------|-----------------------------|
| Parameter | Composite | Composite | Composite | . (South) | (North) | Objective |
| | | | | | | (TAGM 4046) |
| Bromodichloromethane | 14 | ч | " | " | 14 | NA |
| Bromomethane | u | u | ű | " | u | NA |
| Bromoform | ш | 4 | 4 | 4 | " | NA |
| Carbon Tetrachloride | " | " | ¢î . | <u>ц</u> | 4 | 600 |
| Chloroethane | # | ц | Ľ | u | u | 1,900 |
| Chloromethane | u | " | ч | " | 11 | NA |
| 2-Chloroethyl vinyl ether | 4 | " | ü | M | u | NA |
| Chloroform | 4 | " | к | 4 | 4 | 300 |
| 1,1-Dichloroethane | " | | м | 4 | <u>а</u> | 200 |
| 1,2-Dichloroethane | 4 | | u | # | - | 100 |
| 1,1-Dichloroethene | 4 | H | ar . | " | ц | 400 |
| Cis-1,2-Dichloroethene | | 4 | ч | ű | | NA |
| Trans-1,2-Dichloroethene | " | " | # | 59 | 4 | 300 |
| 1,2-Dichloropropane | и и | 4 | u | u | u | NA |
| Cis-1,3-Dichloropropene | " | " | ci | 4 | u | 300 |
| Trans-1,3-Dichloropropene | u | u | ű | u | a | 300 |
| Methylene Chloride | " | u | " | " | u | 100 |
| 1,1,2,2-Tetrachloroethane | . ч | | u u | 4 | - | 600 |
| Tetrachloroethene | 4 | 4 | u | " | 4 | 1,400 |
| 1,1,1-Trichloroethane | " | " | " | ц | u | 800 |
| 1,1,2-Trichloroethane | u | " | | 4 | " | NA |
| Trichloroethene | u | " | 4 | <i>u</i> | 4 | 700 |
| Trichlorofluoromethane | | 4 | | и | " | NA |
| Vinyl Chloride | | | . 44 | ц | " | 200 |
| Benzene | " | " | H | u | 4 | 60 |
| Chiorobenzene | 4 | " | и | u | | 1,700 |
| Ethylbenzene | " | u | | u | н | 5,500 |
| Toluene | " | # | . u | ű | £4 | 1,500 |
| Xylenes | u | 4 | | u | u | 1,200 |
| Styrene | " | u | 4 | " | 14 | NA |
| 1,2-Dichlorobenzene | " | " | 4 | " | u | 7,900 |
| 1,3-Dichlorobenzene | и — | 11 | ĸ | ű | ч | 1,600 |
| 1,4-Dichlorobenzene | " | " | 65 | 4 | | 8,500 |
| Acetone | и | u | 1,970 | 171 | 169 | 200 |
| 2-Butanone | " | u | 4 | 4 | " | 300 |
| 2-Hexanone | u | " | ы 1 | и | " | NA |
| 4-Methyl-2-pentanone | н | u | | u . | | 1,000 |
| Carbon Disulfide | | u | # | 4 | μ | 2,700 |
| Vinyl acetate | 4 | " | ci | " | - ч | NA |

Notes:

1) Results from USEPA Method 8260 for Volatiles; All results in ppb (ug/kg).

2) NA = Not Applicable
3) " means compound not detected above Method Detection Limit (MDL).

Table 2Selected Soil Sample Analytical Results; Semi-volatile OrganicsNovember 28, 2006 Sampling Date

| | S. Wall | N. Wall | E: Wall | Eloor A | Floor B | Recommended |
|----------------------------|--|-----------|-------------|-----------|---------|---------------------------|
| Parameter | Composite | Composite | Composite | 🕗 (South) | (North) | Soil Cleanup Objective |
| | | | | | | (TAGM 4046) |
| Acenaphthene | 14 19 - 21 - 22 - 23 - 24 - 27 - 27 - 28 - 28 - 28 - 28 - 28 - 28 | 14 st | 44 44 | 4 | 14 | 50,000 |
| Anthracene | " | u | ci . | " | " | 50,000 |
| Benzo(a)anthracene | £4 | 705 | 6 \$ | ££ | u | 224 or MDL |
| Benzo(a)pyrene | u | 602 | 4 | " | " | 61 or MDL |
| Benzo(b)fluoranthene | ££ | 538 | 14 | 4 | 64 | 1,100 |
| Benzo(g,h,I)perylene | u | u | 56 | 44 | u | 50,000 |
| Benzo(k)fluoranthene | " | 653 | 26 | 44 | 11 | 1,100 |
| Chrysene | c¢ | 727 | 4 | 66 | 4 | 400 |
| Diethylphthalate | 11 | 4 | 4 | 45 | " | NA |
| Dimethylphthalate | 4 | 24 | 44 | 65 | | 2,000 |
| Butylbenzylphthalate | " | u | 11 | 25 | 44 | 50,000 |
| Di-n-butylphthalate | 14 | 4 | u | 4 | " | 8,100 |
| Di-n-octylphthalate | 14 | 44 | u | " | 44 | 50,000 |
| bis(2-Ethylhexyl)phthalate | £4 | £\$ | ni. | If | 65 | 50,000 |
| 2-Chloronaphthalene | 4 | 65 | ** | ** | 66 | NA |
| Hexachlorbenzene | " | " | 6\$ | 15 | 66 | 410 |
| Hexachloroethane | £5 | eš. | 66 | 11 | 11 | NA |
| Hexachlorocyclopentadiene | 4 | " | 44 | 44 | " | NA |
| Hexachlorobutadiene | ££ | " | 66 | 44 | 11 | NA |
| n-Nitrosodinpropylamine | 41 | " | " | " | 44 | NA |
| n-Nitrosodiphenylamine | 4 | ť | 54 | fi | · \$6 | NA |
| n-Nitrosodimethylamine | 4 | ť | u | " | " | NA |
| Isophorone | 44 | ** | £6 | " | " | 4,400 |
| Benzyl alcohol | ц | " | \$\$ | " | " | NA |
| Dibenzofuran | " | 11 | ££ | 46 | ţi | 6,200 |
| 2-Methylnaphthalene | 4 | 11 | 582 | 44 | " | 36,400 |
| Dibenzo(a,h)anthracene | " | " | " | 56 | £\$ | 14 or MDL |
| Fluoranthene | " | 1,560 | st | " | " | 50,000 |
| Fluorene | " | " | 44 | 54 54 | 46 | 50,000 |
| Indeno(1,2,3-cd)pyrene | ц | ** | 56 | 55 | <i></i> | NA |
| Naphthalene | " | " | 655 | " | Li Li | 13,000 |
| Phenanthrene | " | 1,320 | ** | <i>ii</i> | £6 | 50,000 |
| Pyrene | 14 | 1,370 | 44 | " | 4 | 50,000 |

Notes: 1) Results from USEPA Method 8270 for Semi-volatiles; All results in ppb (ug/kg).

2) Shaded results indicates concentration exceeds RSCO.

3) NA means Not Applicable.

4) MDL means Method Detection Limit.

5) " means compound not detected above MDL.

Table 2 (continued)Soil Sample Analytical Results; Semi-volatile OrganicsNovember 28, 2006 Sampling Date

| Analytical | S, Wall 🖉 | N. Wall | E. Wall 🕸 | Floor A | Flóar B | Recommended |
|-----------------------------|-----------|---------------|--|----------|---------------------------------------|--------------------------|
| Parameter | Composite | Composite | Composite | (South) | (North) - | Soil Cleanup |
| | | ar and a sub- | a dependent de la composition de la compositio | | Pari OALAS Sui OALAS | Cbjective (TAGM 4046) |
| Acenaphthylene | a | 44 | 4 | të i | и | 41,000 |
| 1,2-Dichlorobenzene | " | H | и | . 4 | L L L L L L L L L L L L L L L L L L L | 7,900 |
| 1,3-Dichlorobenzene | " | # | " | и | 4 | 1,600 |
| 1,4-Dichlorobenzene | " | - | # | æ | " | 8,500 |
| 1,2,4-Trichlorobenzene | u | H | и | и | a | 3,400 |
| Nitrobenzene | 4 | " | " | и | 6 | 200 or MDL |
| 2,4-Dinitrotoluene | " | u | u | | ű | NA |
| 2,6-Dinitrotoluene | 4 | · u | " | ч | " | 1,000 |
| bis(2-Chloroethyl)ether | 54 | u | u | и | ц | NA |
| bls(2-Chloroisopropyl)ether | " | ч | u | ц | # | NA |
| bis(2-chloroethoxy)methane | и | ų | u u | н | " | NA |
| 4-Bromophenylphenylether | " | u | " | 4 | ц | NA |
| 4-Chiorophenylphenylether | u | 4 | 4 | и | u . | NA |
| Benzidine | u | u | ш | и | u | NA |
| 3,3-DIchlorobenzidine | " | ч | a | и | и | NA |
| 4-Chloroaniline | и | u | 4 | ч | " | 220 or MDL |
| 2-Nitroanaline | и | 4 | н | ц | 4 | 430 or MDL |
| 3-Nitroanlline | ** | 4 | 4 | ч | и | 500 or MDL |
| 4-Nitroanaline | ц | " | " | * | и | NA |
| Phenoi | " | " | ч | | ц | 30 or MDL |
| 2-Chlorophenol | u | H | ч | | ш | 800 |
| 2,4-Dichlorophenol | | a a | " | ц | н | 400 |
| 2,6-Dichlorophenol | u | " | " | " | " | NA |
| 2,4,5-Trichlorophenol | и | ii ii | " | " | " | 100 |
| 2,4,6-Trichlorophenol | 11 | ä | u | # | " | NA |
| Pentachiorophenol | " | ц ц | " | <i>u</i> | " | 1,000 or MDL |
| 4-Chloro-3-methylphenol | " | " | " | Ľ | " | 240 or MDL |
| 2-Methylphenol | u | N | 3,750 | u | " | 100 or MDL |
| 4-Methylphenol | " | " | · 2,670 4; | 4 | " | 900 |
| 2,4-Dimethylphenol | ű | M | 6,650 | " | " | NA |
| 2-Nitrophenol | ű | * | 4 | 4 | * | 330 or MDL |
| 4-Nitrophenol | " | 4 | | " | ca | 100 or MDL |
| 2,4-Dinitrophenol | " | * | 4 | 4 | и | 200 or MDL |
| 2-Methyl-4,6-dinitrophenol | " | u | e | 4 | " | NA |
| Benzoic Acid | " | 44 | " | | 4 | NA |

Notes: 1) Results from USEPA Method 8270 for Semi-volatiles; All results in ppb (ug/kg).

2) Shaded results indicates concentration exceeds RSCO.

3) NA means Not Applicable.

4) MDL means Method Detection Limit.

5) " means compound not detected above MDL.

Table 3 November 28, 2006 Sampling Date Soil Sample Analytical Results; RCRA Metals (Total)

.

| Analytical Parameter | S? Wallse | N. Wali Composite | E. Wall Composite | Floor A (South) | Floor B (North) | Eastern/USA Background Levels (TAGM 4046) |
|-------------------------|----------------|----------------------|----------------------|--------------------|--------------------|---|
| Arsenic | 16:0 | 30.5 | 10.5 | 3.54 | 2.67 | 3-12* |
| Barium | 125 | 7 32 | 88.6 | 37.8 | 23.8 | 15-600 |
| Cadmium | 0.943 | 20.2 | 0.526 | " | " | 0.1-1.0 |
| Chromium | 13.8 | 66.7 | 12.3 | 9.63 | 5.74 | 1.5-40 |
| Lead | 311 | ia 1,110 | 71.0 | 5.50 | 5.26 | 200-500 |
| Mercury | viii 0.6093⊁ ~ | 0.3051- | 0.0547 | 0.0390 | 0.0224 | 0.001-0.2 |
| Selenium | 4:33+21-3 | 8.26 | 0.739 | " | * | 0.1-3.9 |
| Silver | el | 8.32 | " | n | 4234 | NA |

Notes: 1) All results and Standards expressed in mg/kg. 2) " means compound not detected above MDL 3) NS means not sampled for designated parameter.

Attachment 4

Laboratory Analytical Results

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PARADIGM ENVIRONMENTAL SERVICES, INC.

CHAIN OF CUSTODY

| ENVIRON | IMENI | AL | | | REPORT | Distant in | | escall a sta | 化学いていた 14時間に見た | al Consta Calastic | | INVO | ICE TO |))))))))) | | | | | | | inner kr | |
|--------------------------------------|-----------------|---|--------------------|--|----------------|-----------------|---|-------------------------------------|---|--|-----------------------|------------|-------------------|-------------------|--|-----------------|--------------|---------------|----------------|--------------|---------------------|---------|
| SERVICE | S, INC | • | COMPANY | (; t _ m | intrations | Iné. | | | COMPAN | 4Y: | | | 10.00 m - 10.00 m | | 1977 - Star (1976) | | LAB PROJ | ECT#: | CLIEN | PROJEC | <u>арана</u> Т#: | Basalor |
| 179 Lake Avenue Rochester, NY 14 | | | ADDRESS | | Bulpula | 120. | | | ADDRES | S: | | | | | | | - 06-: | 3634 | 2 | 402 | | |
| (585) 647-2530 • FAX: (585) 647-3 | (800) 724-1 | 997 | CITY: Or | band Park | - (U ST/ | ATE: NY | ZiP; | 1127 | CITY: | | | | STA | TE: | Z | IP; | TURNARO | UND TIME: (WO | DRKING | DAYS) | | |
| | | | PHONE: | 14)667 - | ITO FAX: | 71 4) (d | 67-315 | | PHONE: | •••••• | | | FAX: | | | <u> </u> | | | S | TD | от | HER |
| PROJECT NAME/SITE | | | ATTN: | | | | | | ATTN: | | | | | | | | | | | | Ē | |
| Fleres Trans | parent? | In. | COMMEN | TS: | | | | | 1 | | | | | | | | QUOTE #: | <u>_</u> | <u>" - r</u> | <u> </u> | L | |
| | | | | in se stand gasti Geografia | | 资产发 | | | | NA RE | QUES | TED: | ΔΝΔΙΝ | (SIS) | | | | | | | | |
| DATE | TIME | C O M P O S I T E | G R A B | SAN | IPLE LOCATION/ | FIELD ID | EAN | M A T B I X (1/30 | C O N N U T M A B I E N R E R S | 10 11 | RCRA MILLA | | | | | | REMARK | ss S | | PARAD | DIGM LA | |
| 1 11/25/06 | | \times | | S. Wall | Composite | e | soil | KI | 1 | $\overline{\mathbf{M}}$ | | | | | | | | | | ر ک | 25 | 17 |
| 21/28/06 | | \times | | N. Dull | Composite | | | dill | 1 | 攵が | ŤXT | | | ┼╌┼╴ | | | | | | | 25 | |
| 3 11/24/06 | | $\overline{\mathbf{X}}$ | | E. Vall | amoni H. | | Ţ | 64 | \dot{i} | ΚÌ; | ₹{X} | | | | | | | | | | | |
| 4 11/20/06 | | | \mathbf{X} | Floor A | 16-H1 | > | Y | Guil | 1 | ÍXÍX | | | | | | | | | | 120 | | |
| 5 11/28/00 | | | Ń | Flion B | (North | | | So:1 | | ťŹŊ | | | | | + | | | | | | 25 | |
| 6 | | | | 140/12 | | | | 201 | | + | Ϋ́́Υ | | | | - <u> </u> - | | | | | 12. | 25 | Ч |
| 7 | ······ | | | | | | | | | | + | | | ┢━┝╸ | | | | | | ++ | | + |
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| | eipt Parame | eter | | NELAC Cor | npliance | | | $) \mathcal{A}$ | 1.1 | 11 | r | | | _ | 1 | | | | | | | |
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| Comments: | Holding 1 | līme: | | ×Щ | N |] | Receiv | they | Hoff | | $\underline{\langle}$ | | | 11/- | 30/C Date/Tin | 6 | | DIF | | | 1 | |
| Comments: | Tempera 13°C | ture: i <u>Ced</u> | | Y | N | | lEl | is al ed @ La | eth b By | <u>_ </u> | 40 | n C | ch_ | 11/3 | 0/0 ate/Tin | 6 | 510 | P.I.F. | | |] | |



Volatile Analysis Report for Soils/Solids/Sludges

Client: Hazard Evaluations, Inc

| Client Job Site: | Flexo Transparent, Inc |
|--------------------|------------------------|
| Client Job Number: | 23403 |
| Field Location: | Floor B (North) |
| Field ID Number: | N/A |
| Sample Type: | Soil |

Lab Project Number: 06-3634 Lab Sample Number: 12254

| Date Sampled: | 11/28/2006 |
|----------------|------------|
| Date Received: | 11/30/2006 |
| Date Analyzed: | 12/06/2006 |

| Halocarbons | Results in ug / Kg | Aromatics | Results in ug / Kg |
|---------------------------|--------------------|----------------------|---------------------|
| Bromodichloromethane | ND< 10.7 | Benzene | ND< 10.7 |
| Bromomethane | ND< 10.7 | Chlorobenzene | ND< 10.7 |
| Bromoform | ND< 10.7 | Ethylbenzene | ND< 10:7 |
| Carbon Tetrachloride | ND< 10.7 | Toluene | ND< 10.7 |
| Chloroethane | ND< 10.7 | m,p-Xylene | ND< 10.7 |
| Chloromethane | ND< 10.7 | o-Xylene | ND< 10.7 |
| 2-Chloroethyl vinyl Ether | ND< 10.7 | Styrene | ND< 26.6 |
| Chloroform | ND< 10.7 | 1,2-Dichlorobenzene | ND< 10.7 |
| Dibromochloromethane | ND< 10.7 | 1,3-Dichlorobenzene | ND< 10.7 |
| 1,1-Dichloroethane | ND< 10.7 | 1,4-Dichlorobenzene | ND< 10.7 |
| 1,2-Dichloroethane | ND< 10.7 | <u></u> | - |
| 1,1-Dichloroethene | ND< 10.7 | Ketones | Results in ug / Kg |
| cis-1,2-Dichloroethene | ND< 10.7 | Acetone | 169 |
| trans-1,2-Dichloroethene | ND< 10.7 | 2-Butanone | ND< 53.3 |
| 1,2-Dichloropropane | ND< 10.7 | 2-Hexanone | ND< 26.6 |
| cis-1,3-Dichloropropene | ND< 10.7 | 4-Methyl-2-pentanone | ND< 26.6 |
| trans-1,3-Dichloropropene | ND< 10.7 | | |
| Methylene chloride | ND< 26.6 | Miscellaneous | Results in ug / Kg |
| 1,1,2,2-Tetrachloroethane | ND< 10.7 | Carbon disulfide | ND< 26.6 |
| Tetrachloroethene | ND< 10.7 | Vinyl acetate | ND< 26.6 |
| 1,1,1-Trichloroethane | ND< 10.7 | | |
| 1,1,2-Trichloroethane | ND< 10.7 | | |
| Trichloroethene | ND< 10.7 | | |
| Trichlorofluoromethane | ND< 10.7 | | |
| Vinyl chloride | ND< 10.7 | | |
| ELAP Number 10958 | Method | EPA 8260B | Data File: V41259.D |

Comments: ND denotes Non Detect ug / Kg = microgram per Kilogram Surrrogate outliers indicate probable matrix interference

Bruce Hoogesteger: Technical Director

Signature:

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ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Volatile Analysis Report for Soils/Solids/Sludges

Client: Hazard Evaluations, Inc

| Cilent Job Site: | Flexo Transparent, Inc | Lab Project Number: | 06-3634 |
|---------------------|------------------------|---------------------|------------|
| Oliona Joh Manuta a | 00.400 | Lab Sample Number: | 12253 |
| Client Job Number: | 23403 | | |
| Field Location: | Floor A (South) | Date Sampled: | 11/28/2006 |
| Field ID Number: | N/A | Date Received: | 11/30/2006 |
| Sample Type: | Soil | Date Analyzed: | 12/06/2006 |

| Halocarbons | Results in ug / Kg | Aromatics | Results in ug / Kg |
|---------------------------|--------------------|---|--------------------|
| Bromodichloromethane | ND< 9.55 | Benzene | ND< 9.55 |
| Bromomethane | ND< 9.55 | Chlorobenzene | ND< 9.55 |
| Bromoform | ND< 9.55 | Ethylbenzene | ND< 9.55 |
| Carbon Tetrachloride | ND< 9.55 | Toluene | ND< 9.55 |
| Chloroethane | ND< 9.55 | m,p-Xylene | ND< 9.55 |
| Chloromethane | ND< 9.55 | o-Xylene | ND< 9.55 |
| 2-Chloroethyl vinyl Ether | ND< 9.55 | Styrene | ND< 23.9 |
| Chloroform | ND< 9.55 | 1,2-Dichlorobenzene | ND< 9.55 |
| Dibromochloromethane | ND< 9.55 | 1,3-Dichlorobenzene | ND< 9.55 |
| 1,1-Dichloroethane | ND< 9.55 | 1,4-Dichlorobenzene | ND< 9.55 |
| 1,2-Dichloroethane | ND< 9.55 | And the second se | |
| 1,1-Dichloroethene | ND< 9.55 | Ketones | Results in ug / Kg |
| cis-1,2-Dichloroethene | ND< 9.55 | Acetone | 171 |
| trans-1,2-Dichloroethene | ND< 9.55 | 2-Butanone | ND< 47.8 |
| 1,2-Dichloropropane | ND< 9.55 | 2-Hexanone | ND< 23.9 |
| cis-1,3-Dichloropropene | ND< 9.55 | 4-Methyl-2-pentanone | ND< 23.9 |
| rans-1,3-Dichloropropene | ND< 9.55 | | |
| Methylene chloride | ND< 23.9 | Miscellaneous | Results in ug / Kg |
| 1,1,2,2-Tetrachloroethane | ND< 9.55 | Carbon disulfide | ND< 23.9 |
| fetrachloroethene | ND< 9.55 | Vinyl acetate | ND< 23.9 |
| ,1,1-Trichloroethane | ND< 9.55 | - | |
| ,1,2-Trichloroethane | ND< 9.55 | | |
| richloroethene | ND< 9.55 | | |
| richlorofluoromethane | ND< 9.55 | | |
| (inyl chloride | ND< 9.55 | | |
| LAP Number 10958 | Method: E | EPA 8260B | Data File: V4131 |

Comments: ND denotes Non Detect ug / Kg = microgram per Kilogram Surrrogate outliers indicate probable matrix interference

Bruce Hoogesteger: Technical Director

Signature:

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Volatile Analysis Report for Soils/Solids/Sludges

Client: Hazard Evaluations, Inc

| Client Job Site: | Flexo Transparent, Inc | Lab Project Number: Lab Sample Number: | |
|--------------------|------------------------|---|------------|
| Cilent Job Number: | 23403 | • - | |
| Field Location: | N Wall Composite | Date Sampled: | 11/28/2006 |
| Field ID Number: | N/A | Date Received: | 11/30/2006 |
| Sample Type: | Soil | Date Analyzed: | 12/04/2006 |

| Halocarbons | Results in ug / Kg | Aromatics | Results in ug / Kg |
|---------------------------|--------------------|----------------------|---------------------|
| Bromodichloromethane | ND< 13.8 | Benzene | ND< 13.8 |
| Bromomethane | ND< 13.8 | Chlorobenzene | ND< 13.8 |
| Bromoform | ND< 13.8 | Ethylbenzene | ND< 13.8 |
| Carbon Tetrachloride | ND< 13.8 | Toluene | ND< 13.8 |
| Chloroethane | ND< 13.8 | m,p-Xylene | ND< 13.8 |
| Chloromethane | ND< 13.8 | o-Xylene | ND< 13.8 |
| 2-Chloroethyl vinyl Ether | ND< 13.8 | Styrene | ND< 34.4 |
| Chloroform | ND< 13.8 | 1,2-Dichlorobenzene | ND< 13.8 |
| Dibromochloromethane | ND< 13.8 | 1,3-Dichlorobenzene | ND< 13.8 |
| 1,1-Dichloroethane | ND< 13.8 | 1,4-Dichlorobenzene | ND< 13.8 |
| 1,2-Dichloroethane | ND< 13.8 | W-1 | |
| 1,1-Dichloroethene | ND< 13.8 | Ketones | Results in ug / Kg |
| cis-1,2-Dichloroethene | ND< 13.8 | Acetone | ND< 68.9 |
| trans-1,2-Dichloroethene | ND< 13.8 | 2-Butanone | ND< 68.9 |
| 1,2-Dichloropropane | ND< 13.8 | 2-Hexanone | ND< 34.4 |
| cis-1,3-Dichloropropene | ND< 13.8 | 4-Methyl-2-pentanone | ND< 34.4 |
| trans-1,3-Dichloropropene | ND< 13.8 | | |
| Methylene chloride | ND< 34.4 | Miscellaneous | Results in ug / Kg |
| 1,1,2,2-Tetrachloroethane | ND< 13.8 | Carbon disulfide | ND< 34.4 |
| Tetrachloroethene | ND< 13.8 | Vinyl acetate | ND< 34.4 |
| 1,1,1-Trichloroethane | ND< 13.8 | | |
| 1,1,2-Trichloroethane | ND< 13.8 | | |
| Trichloroethene | ND< 13.8 | | |
| Trichlorofluoromethane | ND< 13.8 | ļ. | |
| Vinyl chloride | / ND< 13.8 | | |
| ELAP Number 10958 | Method: | EPA 8260B | Data File: V41256.D |

Comments: ND denotes Non Detect ug / Kg = microgram per Kilogram

Signature:

Bruce Hoogesteger: Technical Director

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179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311 ENVIRONMENTAL SERVICES, INC.

Volatile Analysis Report for Solls/Solids/Sludges

Client: Hazard Evaluations, Inc.

| Client Job Site: | Flexo Transparent, Inc | Lab Project Lab Sample |
|---|--|---|
| Client Job Number: Field Location: Field ID Number: Sample Type: | 23403 E Wall Composite N/A Soil | Date Sample Date Receiv Date Analyz |

| Lab Project Number: | 06-3634 |
|---------------------|---------|
| Lab Sample Number: | |

| 11/28/2006 |
|------------|
| 11/30/2006 |
| 12/05/2006 |
| |

| Halocarbons | Results in ug / Kg | Aromatics | Results in ug / Kg |
|---------------------------|--------------------|----------------------|--------------------|
| Bromodichloromethane | ND< 77.9 | Benzene | ND< 77.9 |
| Bromomethane | ND< 77.9 | Chlorobenzene | ND< 77.9 |
| Bromoform | ND< 77,9 | Ethylbenzene | ND< 77.9 |
| Carbon Tetrachloride | ND< 77.9 | Toluene | ND< 77.9 |
| Chloroethane | ND< 77.9 | m,p-Xylene | ND< 77.9 |
| Chloromethane | ND< 77.9 | o-Xylene | ND< 77.9 |
| 2-Chloroethyl vinyl Ether | ND< 77.9 | Styrene | ND< 195 |
| Chioroform | ND< 77.9 | 1,2-Dichlorobenzene | ND< 77.9 |
| Dibromochloromethane | ND< 77.9 | 1.3-Dichlorobenzene | ND< 77.9 |
| 1,1-Dichloroethane | ND< 77.9 | 1.4-Dichlorobenzene | ND< 77.9 |
| 1,2-Dichloroethane | ND< 77.9 | | |
| 1,1-Dichloroethene | ND< 77.9 | Ketones | Results in ug / Kg |
| cis-1,2-Dichloroethene | ND< 77.9 | Acetone | 1,970 |
| trans-1,2-Dichloroethene | ND< 77.9 | 2-Butanone | ND< 390 |
| 1,2-Dichloropropane | ND< 77.9 | 2-Hexanone | ND< 195 |
| cis-1,3-Dichloropropene | ND< 77.9 | 4-Methyl-2-pentanone | ND< 195 |
| trans-1,3-Dichloropropene | ND< 77.9 | | |
| Methylene chloride | ND< 195 | Miscellaneous | Results in ug / Kg |
| 1,1,2,2-Tetrachloroethane | ND< 77.9 | Carbon disulfide | ND< 195 |
| Tetrachloroethene | ND< 77.9 | Vinyl acetate | ND< 195 |
| 1,1,1-Trichloroethane | ND< 77.9 | | |
| | ND< 77.9 | | |
| 1,1,2-Trichloroethane | ND< 77.9 | | |
| Trichloroethene | ND< 77.9 | | |
| Trichlorofluoromethane | ND< 77.9 | | |
| Vinyl chloride | | : EPA 8260B | Data File: V41257 |

ELAP Number 10958

Signature:

Method: EPA 8260B

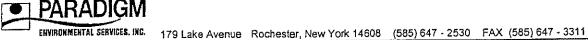
Comments: ND denotes Non Detect ug / Kg = microgram per Kilogram

Surrrogate outliers indicate probable matrix interference

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Bruce Hoogesteger: Technical Director

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Volatile Analysis Report for Soils/Solids/Sludges

Client: Hazard Evaluations, Inc.

Halocarbons

Bromomethane

Bromoform

Chloroform

Chloroethane

Chloromethane

Bromodichloromethane

Carbon Tetrachloride

2-Chloroethyl vinyl Ether

Dibromochloromethane

1,1-Dichloroethane

1,2-Dichloroethane

1.1-Dichloroethene

Methylene chloride

Tetrachloroethene

Trichloroethene

1,1,1-Trichloroethane 1.1.2-Trichloroethane

Trichlorofluoromethane

cis-1,2-Dichloroethene

trans-1,2-Dichloroethene 1.2-Dichloropropane

cis-1,3-Dichloropropene

trans-1,3-Dichloropropene

1,1,2,2-Tetrachloroethane

| Client Job Site: | Flexo Transparent, Inc | Lab Project Number: Lab Sample Number: | |
|---|--|---|-------------------------------------|
| Client Job Number: Field Location: Field ID Number: Sample Type: | 23403 S Wall Composite N/A Soll | Date Sampled: Date Received: Date Analyzed: | 11/28/200 11/30/200 12/04/200 |

Results in ug / Kg

ND< 12.8 ND< 12.8

ND< 12.8

ND< 12.8 ND< 12.8

ND< 12.8

ND< 12.8

ND< 12.8

ND< 12.8

ND< 12.8

ND< 12.8

ND< 12.8

ND< 12.8

ND< 12.8

ND< 12.8

ND< 12.8 ND< 12.8

ND< 32.0

ND< 12.8

ND< 12.8

ND< 12.8

ND< 12.8

ND< 12.8

ND< 12.8 ND< 12.8

| Aromatics | Results in ug / Kg |
|---------------------|--------------------|
| Benzene | ND< 12.8 |
| Chlorobenzene | ND< 12.8 |
| Ethylbenzene | ND< 12.8 |
| Toluene | ND< 12.8 |
| m,p-Xylene | ND< 12.8 |
| o-Xylene | ND< 12.8 |
| Styrene | ND< 32.0 |
| 1,2-Dichlorobenzene | ND< 12.8 |
| 1,3-Dichlorobenzene | ND< 12.8 |
| 1,4-Dichlorobenzene | ND< 12.8 |
| | |
| Ketones | Results in ug / Kg |
| Acetone | ND< 64.0 |

11/28/2006

11/30/2006 12/04/2006

| Results in ug / Ng |
|--------------------|
| ND< 64.0 |
| ND< 64.0 |
| ND< 32.0 |
| ND< 32.0 |
| |

| Miscellaneous | Results in ug / Kg |
|------------------|--------------------|
| Carbon disulfide | ND< 32.0 |
| Vinyl acetate | ND< 32.0 |

Vinyl chloride ELAP Number 10958

Method: EPA 8260B

Data File: V41255.D

Comments: ND denotes Non Detect ug / Kg = microgram per Kilogram

Signature:

Bruce Hoogesteger: Technical Director

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Semi-Volatile Analysis Report for Soils/Solids/Sludges

Client: Hazard Evaluations, Inc

| Client Job Site: | Flexo Transparent, Inc | Lab Project Number: Lab Sample Number: | 06-3634 12251 |
|---|--|---|--|
| Client Job Number: Field Location: Fleid ID Number: Sample Type: | 23403 N Wall Composite N/A Soll | Date Sampled: Date Received: Date Analyzed: | 11/28/2006 11/30/2006 12/06/2006 |

| | | | Results in ug / Kg |
|------------------------------|--------------------|-------------------------------|--------------------|
| Base / Neutrals | Results in ug 7 Kg | Base / Neutrals | ND< 423 |
| Acenaphthene | ND< 423 | Dibenz (a,h) anthracene | 1.560 |
| Anthracene | ND< 423 | Fluoranthene | ND< 423 |
| Benzo (a) anthracene | 705 | Fluorene | |
| Benzo (a) pyrene | 602 | Indeno (1,2,3-cd) pyrene | ND< 423 |
| Benzo (b) fluoranthene | 538 | Naphthalene | ND< 423 |
| Benzo (g,h,i) perylene | ND< 423 | Phenanthrene | 1,320 |
| Benzo (k) fluoranthene | 653 | Pyrene | 1,370 |
| Chrysene | 727 | Acenaphthylene | ND< 423 |
| Diethyl phthalate | ND< 423 | 1,2-Dichlorobenzene | ND< 423 |
| Dimethyl phthalate | ND< 1,060 | 1,3-Dichlorobenzene | ND< 423 |
| Butylbenzylphthalate | ND< 423 | 1,4-Dichlorobenzene | ND< 423 |
| Di-n-butyl phthalate | ND< 423 | 1,2,4-Trichlorobenzene | ND< 423 |
| | ND< 423 | Nitrobenzene | ND< 423 |
| Di-n-octylphthalate | ND< 423 | 2,4-Dinitrotoluene | ND< 423 |
| Bis (2-ethylhexyl) phthalate | ND< 423 | 2.6-Dinitrotoluene | ND< 423 |
| 2-Chloronaphthalene | ND< 423 | Bis (2-chloroethyl) ether | ND< 423 |
| Hexachlorobenzene | ND< 423 | Bis (2-chloroisopropyl) ether | ND< 423 |
| Hexachloroethane | ND< 423 | Bis (2-chloroethoxy) methan | ND< 423 |
| Hexachlorocyclopentadiene | ND< 423 | 4-Bromophenyl phenyl ether | ND< 423 |
| Hexachlorobutadiene | ND< 423 | 4-Chlorophenyl phenyl ether | ND< 423 |
| N-Nitroso-di-n-propylamine | ND< 423 ND< 423 | Benzidine | ND< 1,060 |
| N-Nitrosodiphenylamine | | 3,3'-Dichlorobenzidine | ND< 423 |
| N-Nitrosodimethylamine | ND< 423 | 4-Chloroaniline | ND< 423 |
| Isophorone | ND< 423 | 2-Nitroaniline | ND< 1,060 |
| Benzyl alcohol | ND< 1,060 | 3-Nitroaniline | ND< 1.060 |
| Dibenzofuran | ND< 423 | 4-Nitroaniline | ND< 1,060 |
| 2-Methylnapthalene | ND< 423 | 4-INILIO2111111E | |

| | . Results in ug / Kg | Acids | Results in ug / Kg |
|-------------------------|----------------------|----------------------------|---------------------|
| Acids | | | ND< 423 |
| Phenol | ND< 423 | 2-Methylphenol | · · · - |
| 2-Chiorophenol | ND< 423 | 4-Methylphenol | ND< 423 |
| | ND< 423 | 2,4-Dimethylphenol | ND< 423 |
| 2,4-Dichlorophenol | | 2-Nitrophenol | ND< 423 |
| 2,6-Dichlorophenol | ND< 423 | | ND< 1,060 |
| 2,4,5-Trichlorophenol | ND< 1,060 | 4-Nitrophenol | |
| 2,4,6-Trichlorophenol | ND< 423 | 2,4-Dinitrophenol | ND< 423 |
| | ND< 1.060 | 4,6-Dinitro-2-methylphenol | ND< 1,060 |
| Pentachlorophenol | | | ND< 1,060 |
| 4-Chloro-3-methylphenol | ND< 423 | Benzoic acid | Data File: S32551.D |
| ELAD Mumber 10059 | Method: | EPA 8270C | Data 1 16. 002001.0 |

ELAP Number 10958

Signature:

Method: EPA

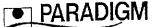
Comments: ND denotes Non Detect

ug / Kg = microgram per Kilogram

Surrrogate outliers indicate probable matrix interference

Bruce Hoogesteger: Technical Director

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Semi-Volatile Analysis Report for Soils/Solids/Sludges

Client: Hazard Evaluations, Inc

| Client Job Site: | Flexo Transparent, Inc | Lab Project Number: Lab Sample Number: | |
|---|--|---|--|
| Client Job Number: Field Location: Field ID Number: Sample Type: | 23403 E Wall Composite N/A Soll | Date Sampled: Date Received: Date Analyzed: | 11/28/2006 11/30/2006 12/06/2006 |

| | | | Results in ug / Kg |
|------------------------------|--------------------|-------------------------------|--------------------|
| Base / Neutrals | Results in ug / Kg | Base / Neutrals | |
| Acenaphthene | ND< 401 | Dibenz (a,h) anthracene | ND< 401 |
| Anthracene | ND< 401 | Fluoranthene | ND< 401 |
| Benzo (a) anthracene | ND< 401 | Fluorene | ND< 401 |
| Benzo (a) pyrene | ND< 401 | Indeno (1,2,3-cd) pyrene | ND< 401 |
| Benzo (b) fluoranthene | ND< 401 | Naphthalene | 655 |
| Benzo (g,h,i) perylene | ND< 401 | Phenanthrene | ND< 401 |
| | ND< 401 | Pyrene | ND< 401 |
| Benzo (k) fluoranthene | ND< 401 | Acenaphthylene | ND< 401 |
| Chrysene | ND< 401 | 1.2-Dichlorobenzene | ND< 401 |
| Diethyl phthalate | ND< 1,000 | 1,3-Dichlorobenzene | ND< 401 |
| Dimethyl phthalate | ND< 401 | 1,4-Dichlorobenzene | ND< 401 |
| Butylbenzylphthalate | ND< 401 | 1,2,4-Trichlorobenzene | ND< 401 |
| Di-n-butyl phthalate | ND< 401 | Nitrobenzene | ND< 401 |
| Di-n-octylphthalate | ND< 401 | 2.4-Dinitrotoluene | ND< 401 |
| Bis (2-ethylhexyl) phthalate | ND< 401 | 2,6-Dinitrotoluene | ND< 401 |
| 2-Chloronaphthalene | • · = · · · · | Bis (2-chloroethyl) ether | ND< 401 |
| Hexachiorobenzene | ND< 401 | Bis (2-chloroisopropyl) ether | ND< 401 |
| Hexachloroethane | ND< 401 | Bis (2-chloroethoxy) methan | ND< 401 |
| Hexachlorocyclopentadiene | ND< 401 | | ND< 401 |
| Hexachlorobutadiene | ND< 401 | 4-Bromophenyl phenyl ether | ND< 401 |
| N-Nitroso-di-n-propylamine | ND< 401 | 4-Chlorophenyl phenyl ether | ND< 1,000 |
| N-Nitrosodiphenylamine | ND< 401 | Benzidine | ND< 401 |
| N-Nitrosodimethylamine | ND< 401 | 3,3'-Dichlorobenzidine | ND< 401 |
| Isophorone | ND< 401 | 4-Chloroaniline | |
| Benzyl alcohol | ND< 1,000 | 2-Nitroaniline | ND< 1,000 |
| Dibenzofuran | ND< 401 | 3-Nitroaniline | ND< 1,000 |
| 2-Methylnapthalene | 582 | 4-Nitroaniline | ND< 1,000 |

| | Results in ug / Kg | Acids | Results in ug / Kg |
|--|--|---|--|
| Acids Phenol 2-Chlorophenol 2,4-Dichlorophenol 2,6-Dichlorophenol 2,4,5-Trichlorophenol 2,4,6-Trichlorophenol Pentachlorophenol | ND< 401 ND< 401 ND< 401 ND< 401 ND< 1,000 ND< 401 ND< 1,000 ND< 401 | 2-Methylphenol 4-Methylphenol 2,4-Dimethylphenol 2-Nitrophenol 4-Nitrophenol 2,4-Dinitrophenol 4,6-Dinitro-2-methylphenol Benzolc acid | 3,750 2,670 6,650 ND< 401 ND< 1,000 ND< 401 ND< 1,000 ND< 1,000 |
| 4-Chloro-3-methylphenol ELAP Number 10958 | | EPA 8270C | Data File: \$32552.D |

Comments: ND denotes Non Detect

ug / Kg = microgram per Kilogram

Surrrogate outliers indicate probable matrix interference

Signature: Bruce Hoogesteger: Technical Director

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ENVIRONMENTAL SERVICES. INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Semi-Volatile Analysis Report for Solis/Solids/Sludges

4

Client: Hazard Evaluations, Inc

| Cllent Job Site: | Flexo Transparent, Inc | Lab Project Number: Lab Sample Number: | |
|---|--|---|--|
| Client Job Number: Fleld Location: Field ID Number: Sample Type: | 23403 S Wall Composite N/A Soil | Date Sampled: Date Received: Date Analyzed: | 11/28/2006 11/30/2006 12/06/2006 |

| | One line of Mar | | Results in ug / Kg |
|------------------------------|--------------------|-------------------------------|--------------------|
| Base / Neutrals | Results in ug / Kg | Base / Neutrals | ND< 394 |
| Acenaphthene | ND< 394 | Dibenz (a,h) anthracene | ND< 394 |
| Anthracene | ND< 394 | Fluoranthene | ND< 394 |
| Benzo (a) anthracene | ND< 394 | Fluorene | |
| Benzo (a) pyrene | ND< 394 | Indeno (1,2,3-cd) pyrene | ND< 394 |
| Benzo (b) fluoranthene | ND< 394 | Naphthalene | ND< 394 |
| Benzo (g,h,i) perylene | ND< 394 | Phenanthrene | ND< 394 |
| Benzo (k) fluoranthene | ND< 394 | Pyrene | ND< 394 |
| Chrysene | ND< 394 | Acenaphthylene | ND< 394 |
| Diethyl phthalate | ND< 394 | 1,2-Dichlorobenzene | ND< 394 |
| Dimethyl phthalate | ND< 985 | 1,3-Dichlorobenzene | ND< 394 |
| Butylbenzylphthalate | ND< 394 | 1,4-Dichlorobenzene | ND< 394 |
| Di-n-butyl phthalate | ND< 394 | 1,2,4-Trichlorobenzene | ND< 394 |
| Di-n-octylphthalate | ND< 394 | Nitrobenzene | ND< 394 |
| Bis (2-ethylhexyl) phthalate | ND< 394 | 2,4-Dinitrotoluene | ND< 394 |
| 2-Chloronaphthalene | ND< 394 | 2.6-Dinitrotoluene | ND< 394 |
| Hexachlorobenzene | ND< 394 | Bis (2-chloroethyl) ether | ND< 394 |
| Hexachloroethane | ND< 394 | Bis (2-chloroisopropyl) ether | ND< 394 |
| | ND< 394 | Bis (2-chloroethoxy) methan | ND< 394 |
| Hexachlorocyclopentadiene | ND< 394 | 4-Bromophenyl phenyl ether | ND< 394 |
| Hexachlorobutadiene | ND< 394 | 4-Chlorophenyl phenyl ether | ND< 394 |
| N-Nitroso-di-n-propylamine | ND< 394 | Benzidine | ND< 985 |
| N-Nitrosodiphenylamine | ND< 394 | 3,3'-Dichlorobenzidine | ND< 394 |
| N-Nitrosodimethylamine | | 4-Chloroaniline | ND< 394 |
| Isophorone | ND< 394 | 2-Nitroaniline | ND< 985 |
| Benzyl alcohol | ND< 985 | 3-Nitroaniline | ND< 985 |
| Dibenzofuran | ND< 394 | • • • • • • • • • | ND< 985 |
| 2-Methylnapthalene | ND< 394 | 4-Nitroaniline | 110 4 000 |

| Acids | Results in ug / Kg | Acids | Results in ug 7 Kg |
|--|--------------------|----------------------------|---------------------|
| Phenol | ND< 394 | 2-Methylphenol | ND< 394 |
| 2-Chlorophenol | ND< 394 | 4-Methylphenol | ND< 394 |
| 2,4-Dichlorophenol | ND< 394 | 2,4-Dimethylphenol | ND< 394 |
| | ND< 394 | 2-Nitrophenol | ND< 394 |
| 2,6-Dichlorophenol 2,4,5-Trichlorophenol | ND< 985 | 4-Nitrophenol | ND< 985 |
| | ND< 394 | 2,4-Dinitrophenol | ND< 394 |
| 2,4,6-Trichlorophenol | ND< 985 | 4,6-Dinitro-2-methylphenol | ND< 985 |
| Pentachlorophenol 4-Chloro-3-methylphenol | ND< 394 | Benzoic acid | ND< 985 |
| ELAP Number 10958 | | EPA 8270C | Data File: S32550.D |

Comments: ND denotes Non Detect

ug / Kg = microgram per Kilogram

Surrrogate outliers indicate probable matrix interference

Signature:

Bruce Hoogesteger: Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional information, including compliance with sample condition 053634S1.XLS requirements upon receipt.



Semi-Volatile Analysis Report for Soils/Solids/Sludges

Client: Hazard Evaluations, Inc

| Client Job Site: | Flexo Transparent, Inc | Lab Project Number: Lab Sample Number: | |
|---|---|---|--|
| Client Job Number: Field Locatlon: Field ID Number: Sample Type: | 23403 Floor B (North) N/A Soil | Date Sampled: Date Received: Date Analyzed: | 11/28/2006 11/30/2006 12/06/2006 |

| Base / Neutrals | Results in ug / Kg | Base / Neutrals | Results in ug / Kg |
|------------------------------|--------------------|-------------------------------|--------------------|
| Acenaphihene | ND< 347 | Dibenz (a,h) anthracene | ND< 347 |
| Anthracene | ND< 347 | Fluoranthene | ND< 347 |
| Benzo (a) anthracene | ND< 347 | Fluorene | ND< 347 |
| Benzo (a) pyrene | ND< 347 | Indeno (1,2,3-cd) pyrene | ND< 347 |
| Benzo (b) fluoranthene | ND< 347 | Naphthalene | ND< 347 |
| Benzo (g,h,i) perylene | ND< 347 | Phenanthrene | ND< 347 |
| Benzo (k) fluoranthene | ND< 347 | Pyrene | ND< 347 |
| Chrysene | ND< 347 | Acenaphthylene | ND< 347 |
| Diethyl phthalate | ND< 347 | 1,2-Dichlorobenzene | ND< 347 |
| Dimethyl phthalate | ND< 868 | 1,3-Dichlorobenzene | ND< 347 |
| Butylbenzylphthalate | ND< 347 | 1,4-Dichlorobenzene | ND< 347 |
| Di-n-butyl phthalate | ND< 347 | 1,2,4-Trichlorobenzene | ND< 347 |
| Di-n-octylphthalate | ND< 347 | Nitrobenzene | ND< 347 |
| Bis (2-ethylhexyl) phthalate | ND< 347 | 2,4-Dinitrotoluene | ND< 347 |
| 2-Chloronaphthalene | ND< 347 | 2,6-Dinitrotoluene | ND< 347 |
| Hexachlorobenzene | ND< 347 | Bis (2-chloroethyl) ether | ND< 347 |
| Hexachioroethane | ND< 347 | Bis (2-chloroisopropyl) ether | ND< 347 |
| Hexachlorocyclopentadiene | ND< 347 | Bis (2-chloroethoxy) methan | ND< 347 |
| Hexachlorobuladiene | ND< 347 | 4-Bromophenyl phenyl ether | ND< 347 |
| N-Nitroso-di-n-propylamine | ND< 347 | 4-Chlorophenyl phenyl ether | ND< 347 |
| N-Nitrosodiphenylamine | ND< 347 | Benzidine | ND< 868 |
| N-Nitrosodimethylamine | ND< 347 | 3,3'-Dichlorobenzidine | ND< 347 |
| Isophorone | ND< 347 | 4-Chloroaniline | ND< 347 |
| Benzyl alcohol | ND< 868 | 2-Nitroaniline | ND< 868 |
| Dibenzofuran | ND< 347 | 3-Nitroaniline | ND< 868 |
| 2-Methylnapthalene | ND< 347 | 4-Nitroaniline | ND< 868 |

| Acids | Results in ug / Kg | Acids | Results in ug / Kg |
|-------------------------|--------------------|----------------------------|---------------------|
| Phenol | ND< 347 | 2-Methylphenol | ND< 347 |
| 2-Chlorophenol | ND< 347 | 4-Methylphenol | ND< 347 |
| 2,4-Dichlorophenol | ND< 347 | 2,4-Dimethylphenol | ND< 347 |
| 2,6-Dichlorophenol | ND< 347 | 2-Nitrophenol | ND< 347 |
| 2,4,5-Trichlorophenol | ND< 868 | 4-Nitrophenol | ND< 868 |
| 2,4,6-Trichlorophenol | ND< 347 | 2,4-Dinitrophenol | ND< 347 |
| Pentachlorophenol | ND< 868 | 4,6-Dinitro-2-methylphenol | ND< 868 |
| 4-Chloro-3-methylphenol | ND< 347 | Benzoic acid | ND< 868 |
| ELAP Number 10958 | Method: | EPA 8270C | Data File: S32554.0 |

Comments: ND denotes Non Detect ug / Kg = microgram per Kilogram

Signalure:

Bruce Hoogesteger: Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. 063634S5.XLS



179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311 ENVIRONMENTAL SERVICES. INC.

Semi-Volatile Analysis Report for Soils/Solids/Sludges

Client: Hazard Evaluations, Inc

| Client Job Site: | Flexo Transparent, Inc | Lab Project Number: Lab Sample Number: | |
|---|---|---|--|
| Client Job Number: Field Location: Field ID Number: Sample Type: | 23403 Floor A (South) N/A Soil | Date Sampled: Date Received: Date Analyzed: | 11/28/2006 11/30/2006 12/06/2006 |

| Results in ug / Kg | Base / Neutrals | Results in ug / Kg |
|--------------------|--|---------------------------------------|
| ND< 342 | Dibenz (a,h) anthracene | ND< 342 |
| ND< 342 | Fluoranthene | ND< 342 |
| ND< 342 | Fluorene | ND< 342 |
| ND< 342 | Indeno (1,2,3-cd) pyrene | ND< 342 |
| ND< 342 | Naphthalene | ND< 342 |
| ND< 342 | Phenanthrene | ND< 342 |
| ND< 342 | Pyrene | ND< 342 |
| ND< 342 | Acenaphthylene | ND< 342 |
| ND< 342 | 1,2-Dichlorobenzene | ND< 342 |
| ND< 855 | 1,3-Dichlorobenzene | ND< 342 |
| ND< 342 | 1,4-Dichlorobenzene | ND< 342 |
| ND< 342 | 1,2,4-Trichlorobenzene | ND< 342 |
| ND< 342 | Nitrobenzene | ND< 342 |
| ND< 342 | 2,4-Dinitrotoluene | ND< 342 |
| ND< 342 | 2,6-Dinitrotoluene | ND< 342 |
| ND< 342 | Bis (2-chloroethyl) ether | ND< 342 |
| ND< 342 | Bis (2-chloroisopropyl) ether | ND< 342 |
| ND< 342 | Bis (2-chloroethoxy) methan | ND< 342 |
| ND< 342 | 4-Bromophenyl phenyl ether | ND< 342 |
| ND< 342 | 4-Chlorophenyl phenyl ether | ND< 342 |
| ND< 342 | Benzidine | ND< 855 |
| | 3,3'-Dichlorobenzidine | ND< 342 |
| | 4-Chloroaniline | ND< 342 |
| | 2-Nitroaniline | ND< 855 |
| ND< 342 | 3-Nitroaniline | ND< 855 |
| ND< 342 | 4-Nitroaniline | ND< 855 |
| | ND< 342 ND< 342 | ND< 342Dibenz (a,h) anthraceneND< 342 |

| Acids | Results in ug / Kg | Acids | Results in ug / Kg |
|-------------------------|--------------------|----------------------------|---------------------|
| Phenol | ND< 342 | 2-Methylphenol | ND< 342 |
| 2-Chlorophenol | ND< 342 | 4-Methylphenol | ND< 342 |
| 2,4-Dichlorophenol | ND< 342 | 2,4-Dimethylphenol | ND< 342 |
| 2,6-Dichlorophenol | ND< 342 | 2-Nitrophenol | ND< 342 |
| 2,4,5-Trichlorophenol | ND< 855 | 4-Nitrophenol | ND< 855 |
| 2,4,6-Trichlorophenol | ND< 342 | 2,4-Dinitrophenol | ND< 342 |
| Pentachlorophenol | ND< 855 | 4,6-Dinitro-2-methylphenol | ND< 855 |
| 4-Chloro-3-methylphenol | ND< 342 | Benzoic acid | ND< 855 |
| ELAP Number 10958 | Method: | EPA 8270C | Data File: S32553.D |

Signature:

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1.17

Comments: ND denotes Non Detect

ug / Kg = microgram per Kilogram

Bruce Hoogesteger: Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional information, including compliance with sample condition 06363454.XLS requirements upon receipt.



| Client: | Hazard Evaluations, Inc. | Lab Project No.: Lab Sample No.: | 06-3634 12251 |
|----------------------------------|--------------------------|-------------------------------------|--------------------------|
| Client Job Site: | Flexo Transparent, Inc. | • | |
| Client Job No.: | 23403 | Sample Type: | Soil |
| Field Location: Field ID No.: | N. Wall Composite N/A | Date Sampled: Date Received: | 11/28/2006 11/30/2006 |

Laboratory Report for Solid Waste Analysis

| Parameter | Date Analyzed | Analytical Method | Result (mg/kg) |
|-----------|---------------|----------------------|----------------|
| Arsenic | 12/06/2006 | EPA 6010 | 30.5 |
| Barium | 12/06/2006 | EPA 6010 | 732 |
| Cadmium | 12/06/2006 | EPA 6010 | 20.2 |
| Chromium | 12/06/2006 | EPA 6010 | 66.7 |
| Lead | 12/06/2006 | EPA 6010 | 1110 |
| Mercury | 12/05/2006 | EPA 7471 | 0.3051 |
| Selenium | 12/06/2006 | EPA 6010 | 8.26 |
| Silver | 12/06/2006 | EPA 6010 | 8.32 |

ELAP ID No :10958

Comments:

Approved By: Bruce Hoogesteger, Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional sample information, including compliance with sample condition requirements upon receipt.



ENVIRONMENTAL SERVICES, INC.

| Client: | Hazard Evaluations, Inc. | Lab Project No.: Lab Sample No.: | 06-3634 12252 |
|----------------------------------|--------------------------|-------------------------------------|--------------------------|
| Client Job Site: | Flexo Transparent, Inc. | Sample Type: | Soil |
| Client Job No.: | 23403 | , | |
| Field Location: Field ID No.: | E. Wall Composite N/A | Date Sampled: Date Received: | 11/28/2006 11/30/2006 |

Laboratory Report for Solid Waste Analysis

| Parameter | Date Analyzed | Analytical Method | Result (mg/kg) |
|-----------|---------------|----------------------|----------------|
| Arsenic | 12/06/2006 | EPA 6010 | 10.5 |
| Barium | 12/06/2006 | EPA 6010 | 88.6 |
| Cadmium | 12/06/2006 | EPA 6010 | 0.526 |
| Chromium | 12/06/2006 | EPA 6010 | 12.3 |
| Lead | 12/06/2006 | EPA 6010 | 71.0 |
| Mercury | 12/05/2006 | EPA 7471 | 0.0547 |
| Selenium | 12/06/2006 | EPA 6010 | 0.739 |
| Silver | 12/06/2006 | EPA 6010 | <1.05 |

ELAP ID No.:10958

Comments:

Approved By:

Bruce Hoogesteger, Technical Director



179 Lake Avenue, Rochester, NY 14608 (585) 647-2530 FAX (585) 647-3311

| Client: | Hazard Evaluations, Inc. | Lab Project No.: Lab Sample No.: | 06-3634 12250 |
|----------------------------------|--------------------------|-------------------------------------|--------------------------|
| Client Job Site: | Flexo Transparent, Inc. | Sample Type: | Soil |
| Client Job No.: | 23403 | | |
| Field Location: Field ID No.: | S. Wall Composite N/A | Date Sampled: Date Received: | 11/28/2006 11/30/2006 |

Laboratory Report for Solid Waste Analysis

| Parameter | Date Analyzed | Analytical Method | Result (mg/kg) |
|-----------|---------------|----------------------|----------------|
| Arsenic | 12/06/2006 | EPA 6010 | 16.0 |
| Barium | 12/06/2006 | EPA 6010 | 125 |
| Cadmium | 12/06/2006 | EPA 6010 | 0.943 |
| Chromium | 12/06/2006 | EPA 6010 | 13.8 |
| Lead | 12/06/2006 | EPA 6010 | 311 |
| Mercury * | 12/05/2006 | EPA 7471 | 0.6093 |
| Selenium | 12/06/2006 | EPA 6010 | 4.33 |
| Silver | 12/06/2006 | EPA 6010 | <1.24 |

ELAP ID No.:10958

Comments: * -Triplicate values differ by greater than 100 % difference between highest and lowest result. This indicates a non-homogenous sample.

Approved By: ___

Bruce Hoogesteger, Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional sample information, including compliance with sample condition requirements upon receipt.



ENVIRONMENTAL SERVICES. INC.

| Client: | Hazard Evaluations, Inc. | Lab Project No.: Lab Sample No.: | 06-3634 12254 |
|----------------------------------|--------------------------|-------------------------------------|--------------------------|
| Client Job Site: | Flexo Transparent, Inc. | Sample Type: | Soil |
| Client Job No.: | 23403 | | |
| Field Location: Field ID No.: | Floor B (North) N/A | Date Sampled: Date Received: | 11/28/2006 11/30/2006 |

Laboratory Report for Solid Waste Analysis

| Parameter | Date Analyzed | Analytical Method | Result (mg/k | (g) |
|-----------|---------------|----------------------|--------------|-----|
| Arsenic | 12/06/2006 | EPA 6010 | 2.67 | |
| Barium | 12/06/2006 | EPA 6010 | 23.8 | D |
| Cadmium | 12/06/2006 | EPA 6010 | <0.554 | м |
| Chromium | 12/06/2006 | EPA 6010 | 5.74 | D |
| Lead | 12/06/2006 | EPA 6010 | 5.26 | D |
| Mercury | 12/05/2006 | EPA 7471 | 0.0224 | |
| Selenium | 12/06/2006 | EPA 6010 | <0.554 | |
| Silver | 12/06/2006 | EPA 6010 | <1.11 | |

ELAP ID No.:10958

Comments:

Approved By: Bruce Hoogesteger, Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional sample information, including compliance with sample condition requirements upon receipt.

-



179 Lake Avenue, Rochester, NY 14608 (585) 647-2530 FAX (585) 647-3311

| Client: | Hazard Evaluations, Inc. | Lab Project No.: Lab Sample No.: | 06-3634 12253 |
|----------------------------------|--------------------------|-------------------------------------|--------------------------|
| Client Job Site: | Flexo Transparent, Inc. | | 12200 |
| Client Job No.: | 23403 | Sample Type: | Soil |
| Field Location: Field ID No.: | Floor A (South) N/A | Date Sampled: Date Received: | 11/28/2006 11/30/2006 |

Laboratory Report for Solid Waste Analysis

| Parameter | Date Analyzed | Analytical Method | Result (mg/kg) |
|-----------|---------------|----------------------|----------------|
| Arsenic | 12/06/2006 | EPA 6010 | 3.54 |
| Barium | 12/06/2006 | EPA 6010 | 37.8 |
| Cadmium | 12/06/2006 | EPA 6010 | <0.548 |
| Chromium | 12/06/2006 | EPA 6010 | 9.63 |
| Lead | 12/06/2006 | EPA 6010 | 5.50 |
| Mercury | 12/05/2006 | EPA 7471 | 0.0390 |
| Selenium | 12/06/2006 | EPA 6010 | <0.548 |
| Silver | 12/06/2006 | EPA 6010 | <1.09 |

ELAP ID No.:10958

Comments:

Approved By: _ Bruce Hoogesteger, Technical Director

This report is part of a multipage document and should only be evaluated in its entirely. Chain of Custody provides additional sample information, including compliance with sample condition requirements upon receipt.



Flexo Transparent, Inc. REMEDIAL INVESTIGATION REPORT

Appendix B

Photo Log

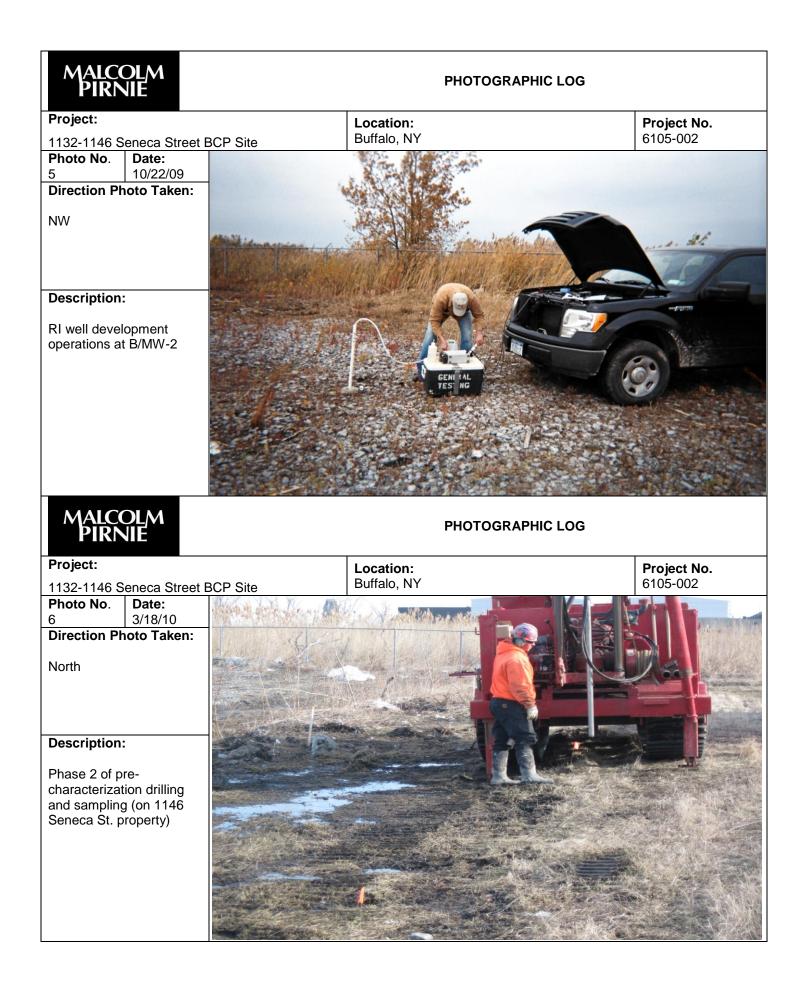


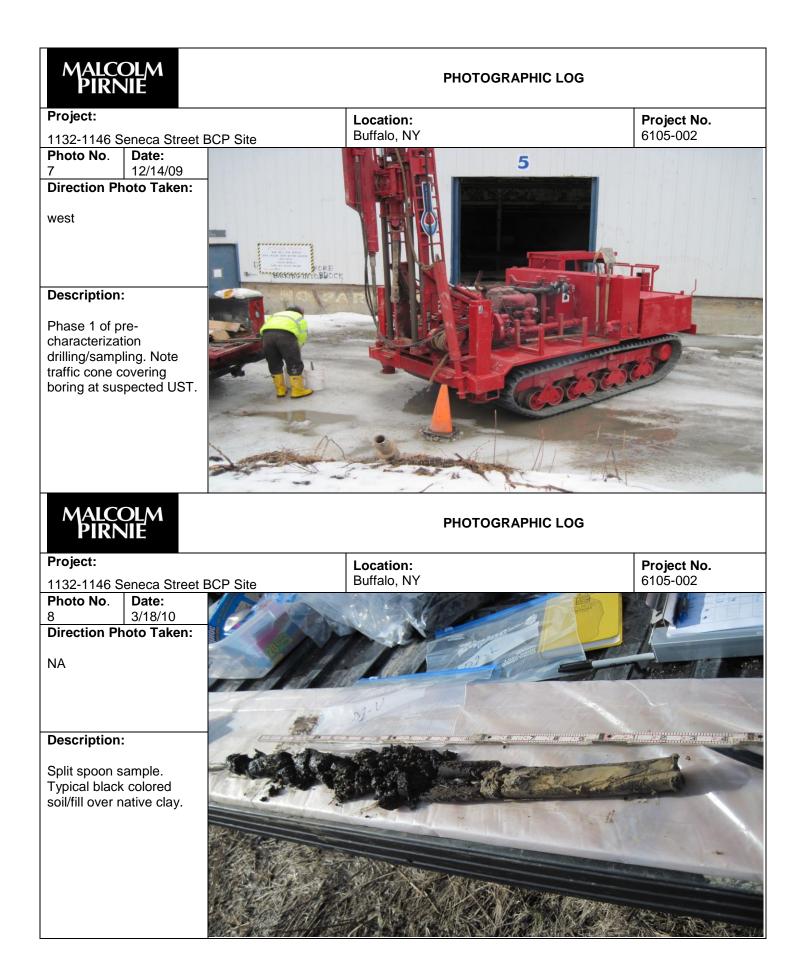
6105002 / BUF

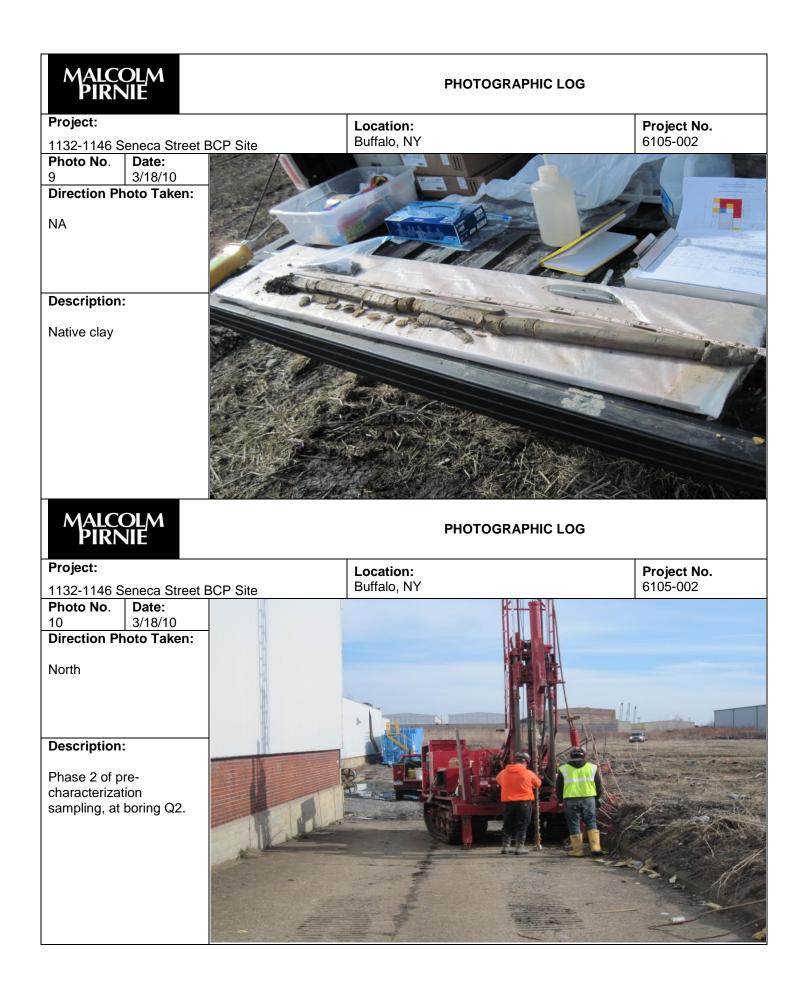


| MALCOLM PIRNIE | | | PHOTOGRAPHIC LOG |
|---|----------|-------------|------------------|
| Project: | | Location: | Project No. |
| 1132-1146 Seneca Street | BCP Site | Buffalo, NY | 6105-002 |
| Photo No.Date:210/19/09Direction Photo Taken: | _ | | |
| West | I | | |
| Description: North yard of 1132 Seneca St. property | | | |





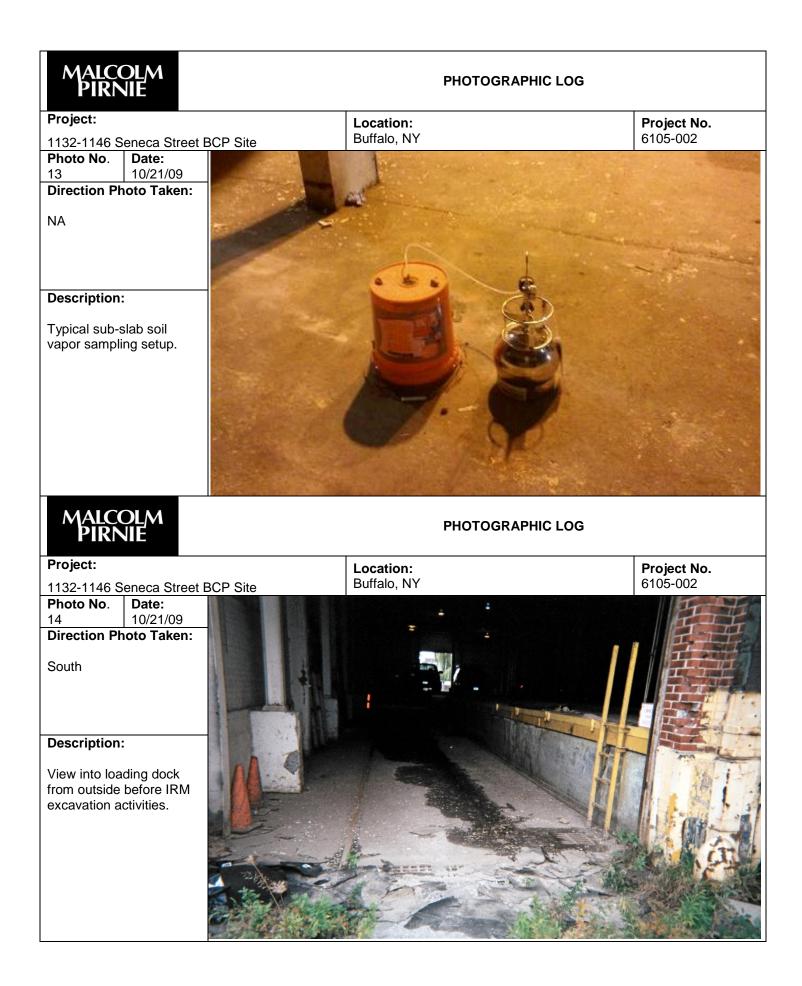


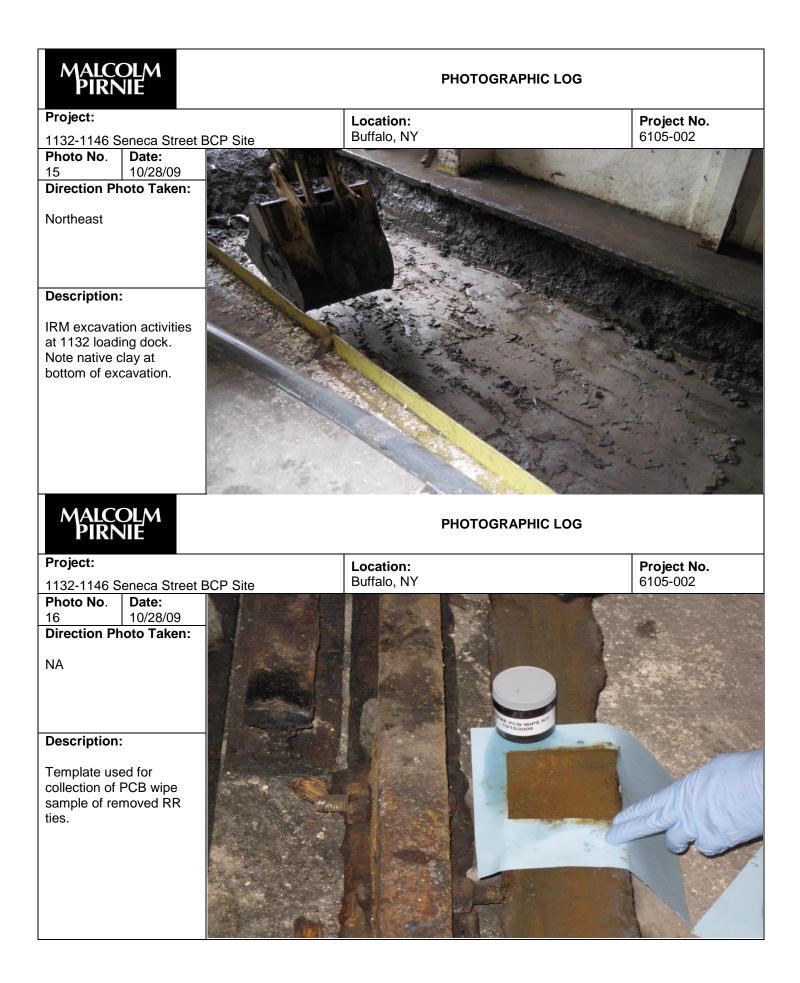


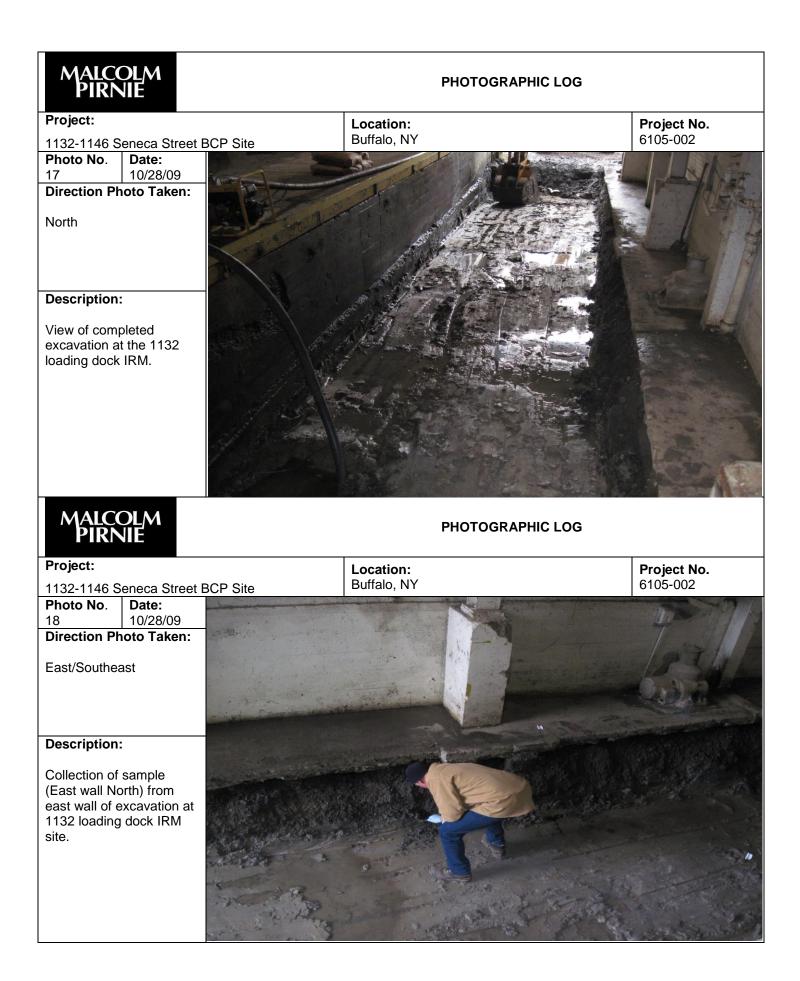


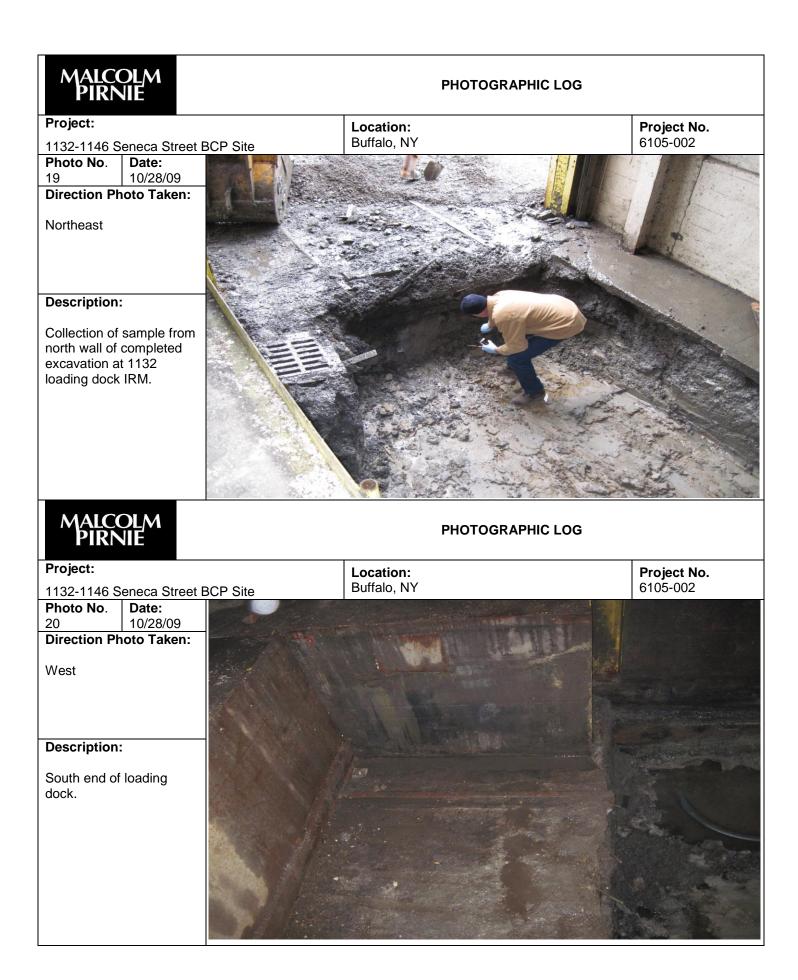
PHOTOGRAPHIC LOG

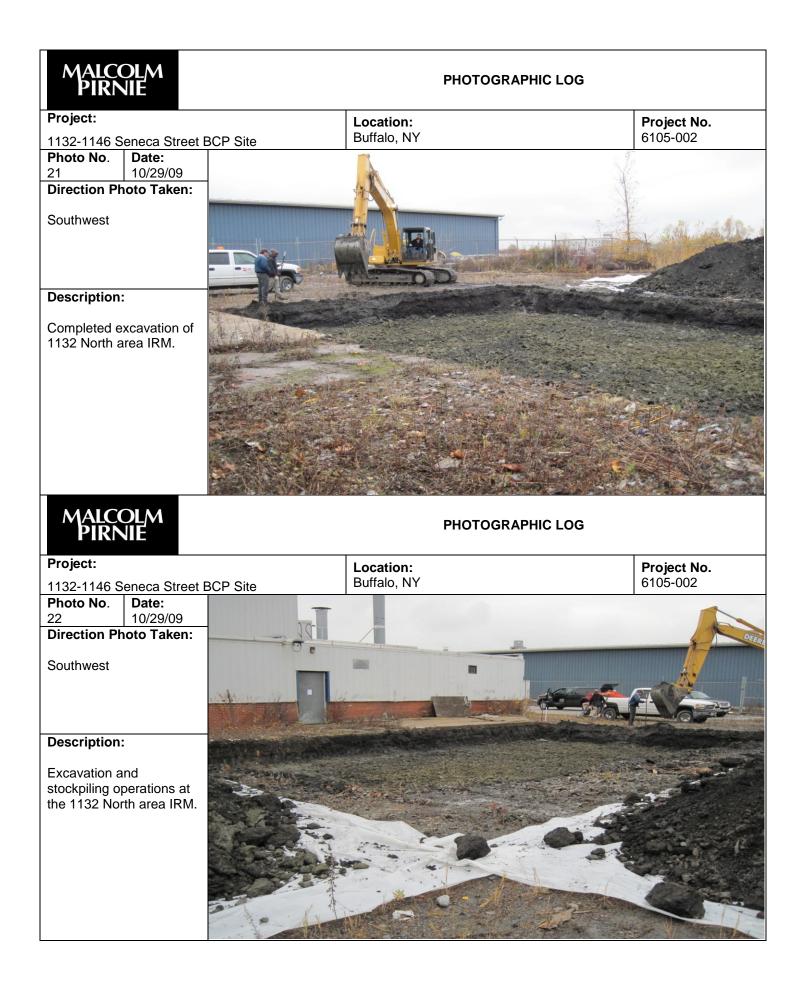


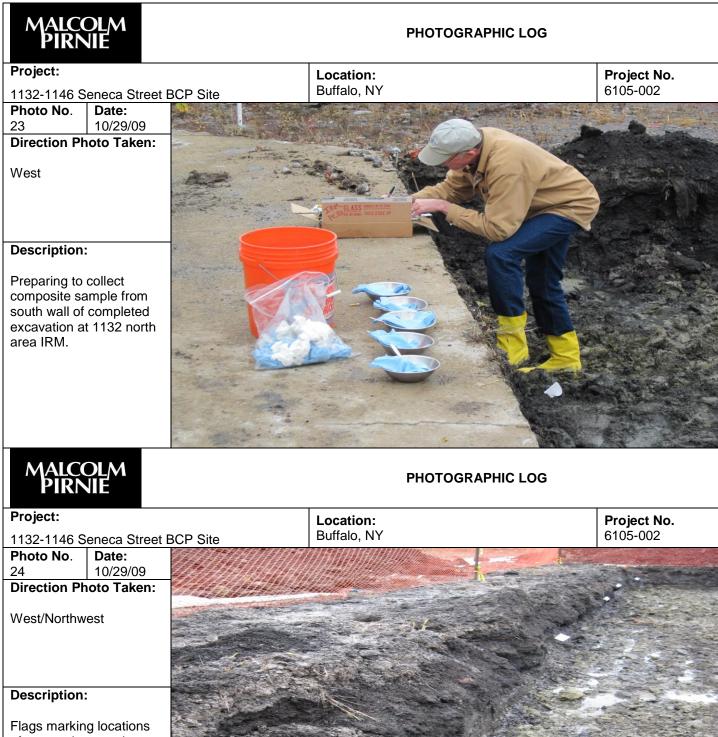




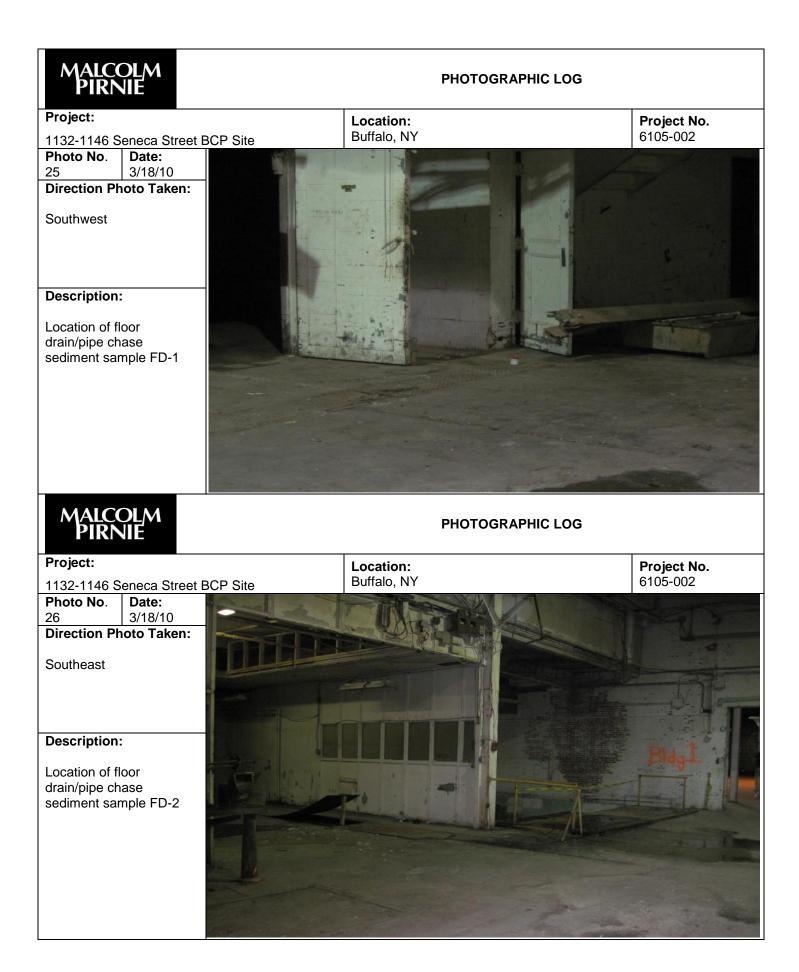


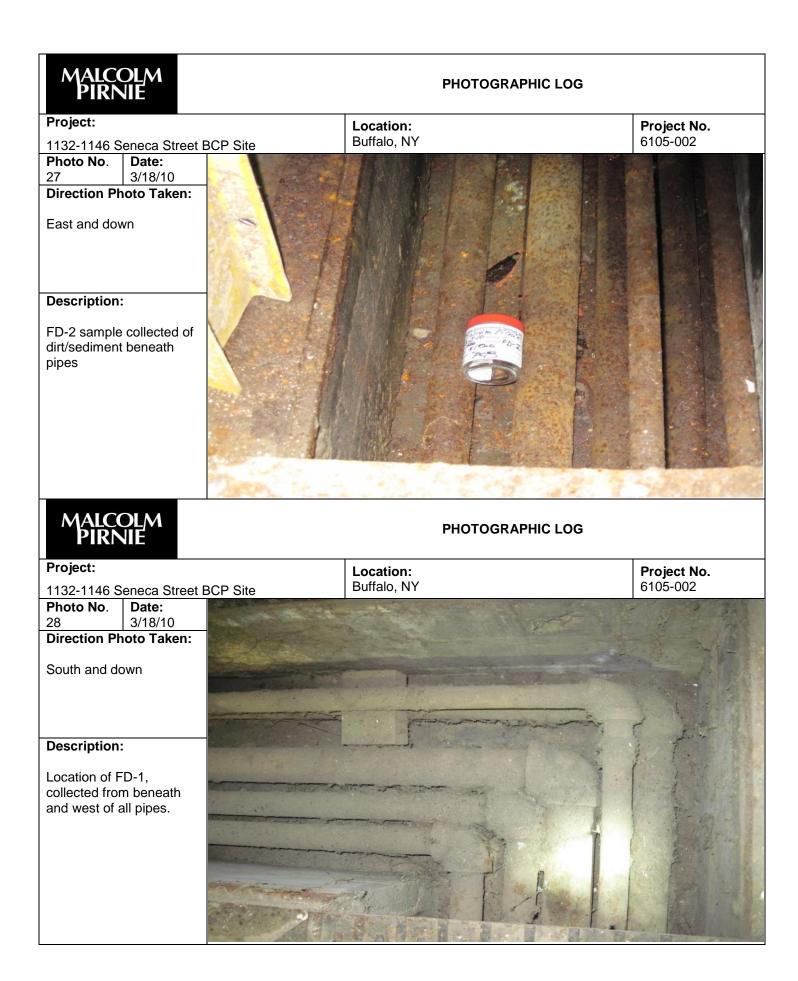






of composite sample points sampled from north wall of the 1132 North area IRM.







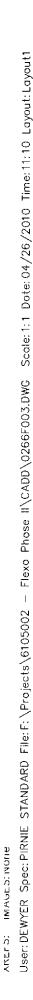
Flexo Transparent, Inc. REMEDIAL INVESTIGATION REPORT

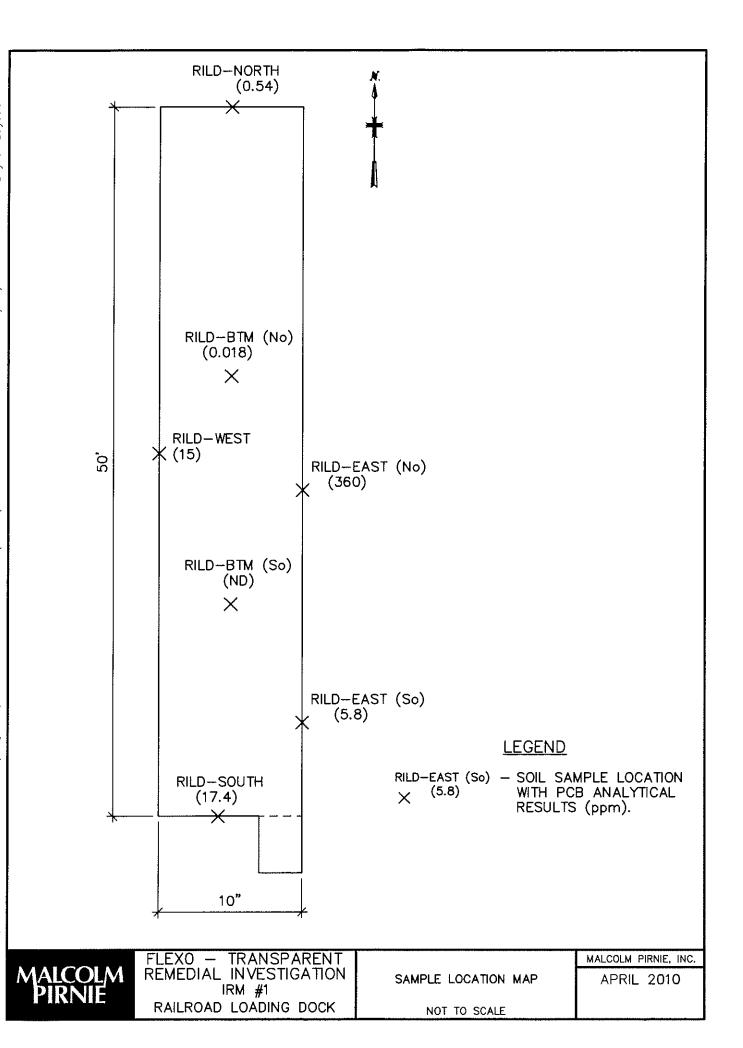
Appendix C

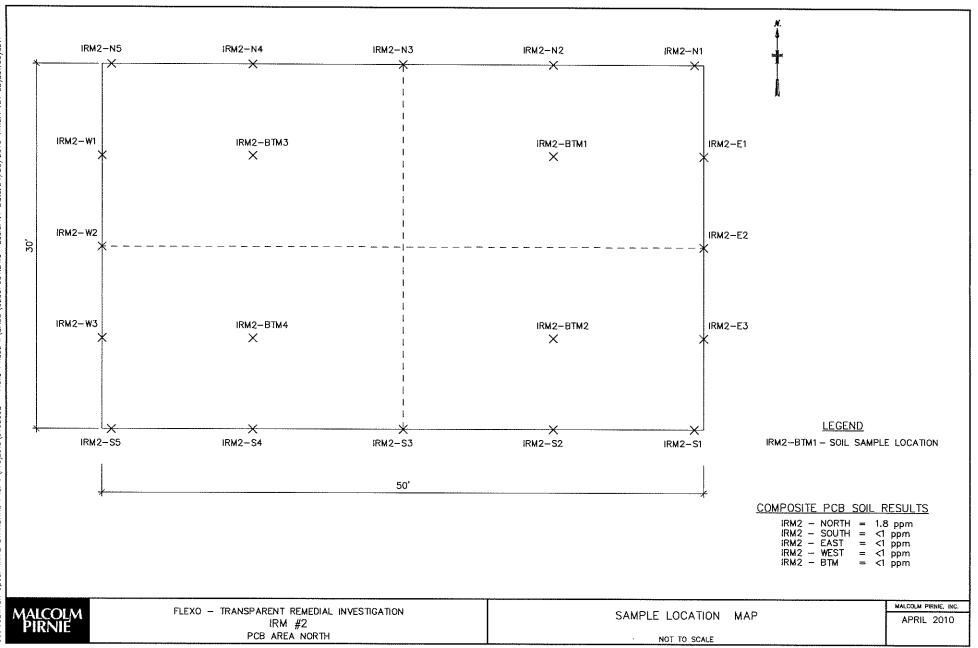
Documentation of IRM's



6105002 / BUF







Scole: 1:1 Date: 04/26/2010 Time: 11: 31 Layout: Layout1 Flexo Phose II\CADD\0266F004.DWG T 3: IMAGES:None DEWYER Spec: PIRNIE STANDARD File:F: \Projects\6105002

New York State Department of Environmental Conservation

Division of Solid and Hazardous Materials, Region 9 270 Michigan Avenue, Buffalo, New York, 14203-2999 Phone: (716) 851-7220 • Fax: (716) 851-7226 Website: <u>www.dec.ny.gov</u>



December 3, 2009

Mr. Nicholas Morreale EnSol, Inc. 661 Main Street Niagara Falls, New York 14301

Dear Mr. Morreale:

Town of Tonawanda Landfill, #15829 Alternate Grading Material (AGM) Request Flexo Transparent, Inc.

This is in response to your letter dated November 23, 2009 requesting approval to accept non-hazardous contaminated soil generated during the remedial activities at the Flexo Transparent, Inc. site, located at 1132 Seneca Street, Buffalo, NY. The material is proposed for use as AGM at the Town of Tonawanda landfill and you have estimated that about 1000 tons will be delivered to the landfill.

In follow-up to your submission, I was contacted by both the engineer and contractor for the remedial project in order to provide additional clarification on the specific wastes generated at the Flexo Transparent facility. On December 2, 2009 I received an email from Mr. James Richert, of Malcom Pirnie, Inc. which provided a site drawing of the two Interim Remedial Measure (IRM) areas and details on the PCB analytical results for the various stockpiles of excavated soils.

Based on this additional information, the Department hereby approves for acceptance at the Town of Tonawanda landfill for use as alternate grading material, **only** the contaminated soils excavated from the outdoor North IRM Area #2, which are contained in the two piles labeled as "North" and "East" on Malcolm Pirnie's Sample Location Map, Figure 1. The quantity of this material is estimated to be 283 tons.

Specifically excluded from this approval are any PCB contaminated materials from the clean up at the loading dock area, IRM Area #1.

Placement and handling of the material must be in accordance with the Operations and Maintenance Manual, revised May 2001, prepared by EnSol, Inc.

Mr. Nicholas Morreate Flexo Transparent Inc – AGM December 3, 2009 Page 2

Additionally, the Department's approval for the use of the above referenced material as AGM at the Town of Tonawanda landfill does not relieve the Town from having to comply with any other applicable local, state and/or federal requirements.

If you have any questions regarding this matter, please call me at 851-7220.

Sincerely,

Dennis R. Weiss, P.E. Environmental Engineer II

DRW:dcg weiss\morreale-dec1.ltr

 Mr. Mark Hans, P.E., Regional Solid Materials Engineer Mr. Robert Morris, Town of Tonawanda Mr. Bill Murray, NYSDEC Buffalo office Mr. James Richert, Malcolm Pirnie, Inc.

RECEIVED

DEC 08 2009

Malcolm Pirnie BUFFALO

1132-1146 SENECA STREET SITE IRM CONFIRMATORY SAMPLE RESULTS (PCBs)

| | | Restricted | |
|----------------------|------------------|--------------------|---------------------------|
| | | Industrial SCO = 1 | PCB Hazardous Waste Level |
| Sample # | PCB Result (PPM) | PPM) | = > 50 PPM |
| | P | lorth IRM Area | |
| North | 1.81/Dup = 1.99 | 25 PPM | NA |
| East | 0.83 | 25 PPM | NA |
| South | 0.53 | 25 PPM | NA |
| West | 0.27 | 25 PPM | NA |
| Bottom | 0.014 | 25 PPM | NA |
| | | | |
| | Load | ing Dock IRM Area | |
| North | 0.54 | 25 PPM | NA |
| South ⁽¹⁾ | 17.4 | 25 PPM | NA |
| West ⁽²⁾ | 15 | 25 PPM | NA |
| East (N) | 360 | 25 PPM | NA |
| East (S) | 5.8 | 25 PPM | NA |
| Bottom (N) | 0.018 | 25 PPM | NA |
| Bottom (S) | ND | 25 PPM | NA |
| | М | aterial Samples | |
| Concrete A1 | 320 | NA | 50 PPM |
| Concrete B1 | 79 | NA | 50 PPM |
| Concrete C1 | 450 | NA | 50 PPM |
| Rail Wipe | 0.89 | NA | 50 PPM |
| | | | |
| | | | |
| | | | |
| Prepared 4/14 | l/10 jjr | | |

⁽¹⁾ South excavation wall made of wood

⁽²⁾ West excavation wall made of concrete



Analytical Report Cover Page

<u>Op Tech Environmental</u>

For Lab Project # 09-4687 Issued December 28, 2009 This report contains a total of 10 pages

The reported results relate only to the samples as they have been received by the laboratory.

Any noncompliant QC parameters having impact on the data are flagged or documented on the final report.

All soil/sludge samples have been reported on a dry weight basis, unless qualified "reported as received". Other solids are reported as received.

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The Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. Sample condition requirements are defined under the 2003 NELAC Standard, sections 5.5.8.3.1 and 5.5.8.3.2.

NYSDOH ELAP does not certify for all parameters. Paradigm Environmental Services or the indicated subcontracted laboratory does hold certification for all analytes where certification is offered by ELAP unless otherwise specified.

Data qualifiers are used, when necessary, to provide additional information about the data. This information may be communicated as a flag or as text at the bottom of the report. Please refer to the following list of frequently used data flags and their meaning:

"ND" = analyzed for but not detected.

- "E" = Result has been estimated, calibration limit exceeded.
- "D" = Duplicate results outside QC limits. May indicate a non-homogenous matrix.
- "M" = Matrix spike recoveries outside QC limits. Matrix blas indicated.

"B" = Method blank contained trace levels of analyte. Refer to included method blank report.

pH Analysis Report

Client: OP-Tech

| Client Job Site: | FLEXO | Lab Project Number: | 09-4687 |
|---------------------------|---------------------|--|--|
| Client Job Number: | N/A | Date Sampled: Time Sampled: | 12/16/2009 11:55 AM |
| Sample Type: Location: | Water Laboratory | Date Received: Time Received: Date Analyzed: Time Analyzed: | 12/17/2009 1:50 PM 12/16/2009 * 4:40 PM |

| Lab Sample Number | Field Number | Field Location | Result (pH) |
|-------------------|--------------|--|----------------|
| 14182 | N/A | Excavation-Water | 7.46 |
| 101-10 | | | - |
| | | | |
| | | | |
| AR Number 10058 | | ······································ | Method: EPA 15 |

ELAP Number 10958

Method: EPA 150.2

Comments Sample was analyzed for pH prior to log-in.

Signature:

Bruce Hoogesterer: Technical Director



179 Lake Avenue Rochester New York 14608 (585) 647-2530 FAX (585) 647-3311

| Client: | <u>OP-Tech</u> | Lab Project No.: Lab Sample No.: | |
|------------------|--------------------|-------------------------------------|------------|
| Client Job Site: | FLEXO | Sample Type: | Water |
| Cilent Job No.: | N/A | Date Sampled: | 12/16/2009 |
| Field Location: | Excavation - Water | Date Received: | |

Laboratory Report of Analysis

| Parameter | Date Analyzed | Analytical Method | Result (mg/L) |
|---------------------------|---------------|----------------------|---------------|
| Total Cyanide | 12/22/2009 | EPA 335.4 | ND<0.01 |
| Oil and Grease | 12/28/2009 | EPA 1664 | ND<1.0 |
| Total Phenolics | 12/23/2009 | EPA 420.1 | 0.003 |
| Total Suspended Solids | 12/21/2009 | SM 2540 D | 12.0 |

ELAP iD.No.: 10709

Comments:

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ND denotes Non Detect.

Approved By Technical Director:

Bruce Hoogesteger

This report is part of a multipage document and should only be evaluated in its entirety. The Chain of Custody provides additional sample information, including compliance with the sample condition requirements upon receipt.



Client:

Client Job Site:

Client Job No.:

Field Location:

Field ID No.:

179 Lake Avenue, Rochester, NY 14608 (585) 647-2530 FAX (585) 647-3311

| ENVIRONMENTAL | SERVICES. | INC. | |
|-------------------|-----------|------|--|
| | | | |

OP-Tech

FLEXO

Excavation - Water

N/A

N/A

| Lab Project No.: Lab Sample No.: | |
|-------------------------------------|--------------------------|
| Sample Type: | Water |
| Date Sampled: Date Received: | 12/16/2009 12/17/2009 |

Laboratory Report for TAL Metals Analysis in Waters

| Parameter | Date Analyzed | Analytical Method | Result (mg/L) |
|-----------|---------------------------------------|------------------------|-------------------|
| Aluminum | 12/22/2009 | EPA 200.7 | 0.387 |
| Antimony | 12/28/2009 | EPA 200.7 | <0.060 |
| Arsenic | 12/23/2009 | EPA 200.7 EPA 200.7 | <0.005 |
| | 12/22/2009 | | 0.062 |
| Barium | | EPA 200.7 | |
| Beryllium | 12/22/2009 | EPA 200.7 | <0.005 |
| Cadmium | 12/22/2009: • | EPA 200.7 | <0.005 |
| Calcium | 12/22/2009 | EPA 200.7 | 184 |
| Chromium | 12/22/2009 | EPA 200.7 | <0.010 |
| Cobalt | 12/22/2009 | EPA 200.7 | <0.010 |
| Copper | 12/22/2009 | EPA 200.7 | <0.010 |
| Iron | 12/22/2009 | EPA 200.7 | 0.483 |
| Lead | 12/22/2009 | EPA 200.7 | <0.005 |
| Magnesium | 12/22/2009 | EPA 200.7 | 32.8 |
| Manganese | 12/22/2009 | EPA 200.7 | 0.518 |
| Мегсигу | 12/22/2009 | EPA 245.1 | <0.0002 |
| Nickel | 12/22/2009 | EPA 200.7 | <0.040 |
| Potassium | 12/22/2009 | EPA 200.7 | 6.99 |
| Selenium | 12/23/2009 | EPA 200.7 | <0.005 |
| Silver | 12/22/2009 | EPA 200.7 | <0.010 |
| Sodium | 12/22/2009 | EPA 200.7 | 36.2 |
| Thallium | 12/22/2009 | EPA 200.7 | <0.006 |
| Vanadium | 12/22/2009 | EPA 200.7 | <0.010 |
| Zinc | 12/22/2009 | EPA 200.7 | 0.039 |
| | · · · · · · · · · · · · · · · · · · · | | ELAP ID No.:10958 |

Comments:

Approved By:

Bruce Hoogesteger, Technical Director

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179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

PCB Analysis Report for Non-potable Water

Client: OP-Tech

| Client Job Site: | FLEXO | Lab Project Number: Lab Sample Number: | |
|---|---|---|--|
| Client Job Number: Field Location: Field ID Number: Sample Type: | FFLE-0002 Excavation-Water N/A Water | Date Sampled: Date Received: Date Analyzed: | 12/16/2009 12/17/2009 12/22/2009 |

| PCB Identification | Results in ug / L |
|--------------------|-------------------|
| Aroclor 1016 | ND< 1.00 |
| Aroclor 1221 | ND< 1.00 |
| Aroclor 1232 | ND< 1.00 |
| Aroclor 1242 | ND< 1.00 |
| Aroclor 1248 | ND< 1.00 |
| Aroclor 1254 | ND< 1.00 |
| Aroclor 1260 | 1.93 |

ELAP Number 10958

Method: EPA 608

Comments: ND denotes Non Detect ug / L = microgram per Liter

Signature:

Bruce Hoogesteger: Technical Director

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ENVIRONMENTAL SERVICES. INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Pesticide Analysis Report for Non-potable Water

Client: OP-Tech

| Client Job Site: | FLEXO | Lab Project Number: | 09-4687 |
|--------------------|--------------------|---------------------|------------|
| | : | Lab Sample Number: | 14182 |
| Client Job Number: | N/A | | |
| Field Location: | Excavation - Water | Date Sampled: | 12/16/2009 |
| Field ID Number: | N/A | Date Received: | 12/17/2009 |
| Sample Type: | Water | Date Analyzed: | 12/21/2009 |

| Pesticide Identification | Results in ug / L | | | |
|--------------------------|-------------------|--|--|--|
| Aldrin | ND< 0.10 | | | |
| alpha-BHC | ND< 0.10 | | | |
| beta-BHC | ND< 0.10 | | | |
| delta-BHC | ND< 0.10 | | | |
| gamma-BHC | ND< 0.10 | | | |
| alpha-Chlordane | ND< 0.10 | | | |
| gamma-Chlordane | ND< 0.10 | | | |
| 4,4'-DDD | ND< 0.10 | | | |
| 4,4'-DDE | ND< 0.10 | | | |
| 4,4'-DDT | ND< 0.10 | | | |
| Dieldrin | ND< 0.10 | | | |
| Endosulfan I | ND< 0.10 | | | |
| Endosulfan II | ND< 0.10 | | | |
| Endosulfan Sulfate | ND< 0.10 | | | |
| Endrin | ND< 0.10 | | | |
| Endrin Aldehyde | ND< 0.10 | | | |
| Heptachlor | ND< 0.10 | | | |
| Heptachlor Epoxide | ND< 0.10 | | | |
| Methoxychlor | ND< 0.50 | | | |
| Toxaphene | ND< 5.00 | | | |
| ELAP Number 10709 | Method: EPA 608 | | | |

Comments: ND denotes Non Detect ug / L = microgram per Liter

Bruce Hoogesteger: Technipal Director

This report is part of a multipage document and should only be evaluated in its antirety. Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. Op Tech 09-4687

Signature:



ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Semi -Volatile Analysis Report for Non-potable Water

Client: OP-Tech

| Client Job Site: | FLEXO | Lab Project Number: | 09-4687 |
|--------------------|------------------|---------------------|------------|
| | | Lab Sample Number: | 14182 |
| Client Job Number: | FFLE-0002 | | |
| Field Location: | Excavation-Water | Date Sampled: | 12/16/2009 |
| Field ID Number: | N/A | Date Received: | 12/17/2009 |
| Sample Type: | Water | Date Analyzed: | 12/22/2009 |
| | | | |

| Base / Neutrals | Results in ug / L | Base / Neutrals | Results in ug / L |
|------------------------------|-------------------|-------------------------------|-------------------|
| Acenaphthene | ND< 12.5 | Dibenz (a,h) anthracene | ND< 12.5 |
| Anthracene | ND< 12.5 | Fluoranthene | ND< 12.5 |
| Benzo (a) anthracene | ND< 12.5 | Fluorene | ND< 12.5 |
| Benzo (a) pyrene | ND< 12.5 | Indeno (1,2,3-cd) pyrene | ND< 12.5 |
| Benzo (b) fluoranthene | ND< 12.5 | Naphthalene | ND< 12.5 |
| Benzo (g,h,i) perylene | ND< 12.5 | Phenanthrene | ND< 12.5 |
| Benzo (k) fluoranthene | ND< 12.5 | Pyrene | ND< 12.5 |
| Chrysene | ND< 12.5 | Acenaphthylene | ND< 12.5 |
| Diethyl phthalate | ND< 12.5 | 1,2-Dichlorobenzene | ND< 12.5 |
| Dimethyl phthalate | ND< 31.3 | 1,3-Dichlorobenzene | ND< 12.5 |
| Butylbenzylphthalate | ND< 12.5 | 1,4-Dichlorobenzene | ND< 12.5 |
| Di-n-butyi phthalate | ND< 12.5 | 1,2,4-Trichlorobenzene | ND< 12.5 |
| Di-n-octylphthalate | ND< 12,5 | Nitrobenzene | ND< 12.5 |
| Bis (2-ethylhexyl) phthalate | ND< 12.5 | 2,4-Dinitrotoluene | ND< 12.5 |
| 2-Chloronaphthalene | ND< 12.5 | 2,6-Dinitrotoluene | ND< 12.5 |
| Hexachlorobenzene | ND< 12.5 | Bis (2-chloroethyl) ether | ND< 12.5 |
| Hexachloroethane | ND< 12.5 | Bis (2-chloroisopropyl) ether | ND< 12.5 |
| Hexachlorocyclopentadiene | ND< 12.5 | Bis (2-chloroethoxy) methan | ND< 12.5 |
| Hexachlorobutadlene | ND< 12.5 | 4-Bromophenyl phenyl ether | ND< 12.5 |
| N-Nitroso-di-n-propylamine | ND< 12.5 | 4-Chlorophenyl phenyl ether | ND< 12.5 |
| N-Nitrosodiphenylamine | ND< 12.5 | Benzidine | ND< 31.3 |
| N-Nitrosodimethylamine | ND< 12.5 | 3,3'-Dichlorobenzidine | ND< 12.5 |
| Isophorone | ND< 12.5 | | |

ELAP Number 10958

Signature:

Method: EPA 625

Data File: S48232.D

Comments: ND denotes Non Detect ug / L = microgram per Liter

Bruce Hoogesteger: Technical Director

This report is part of a multipage document and should only be evaluated in its enlirety. Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. 094687S2.XLS ENVIRONMENTAL SERVICES. INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Semi -Volatile Analysis Report for Non-potable Water (Acid Fraction)

Client: OP-Tech

Client Job Site: FLEXO

Client Job Number:FFLE-0002Field Location:Excavation-WaterField iD Number:N/ASample Type:Water

Lab Project Number: 09-4687 Lab Sample Number: 14182

| Date Sampled: | 12/16/2009 |
|----------------|------------|
| Date Received: | 12/17/2009 |
| Date Analyzed: | 12/22/2009 |

| Acids | Results in ug / L | Acids | Results in ug / L |
|-------------------------|-------------------|----------------------------|---------------------|
| Phenol | ND< 12.5 | 2,4-Dimethylphenol | ND< 12.5 |
| 2-Chlorophenol | ND< 12.5 | 2-Nitrophenol | ND< 12.5 |
| 2,4-Dichlorophenol | ND< 12.5 | 4-Nitrophenol | ND< 31.3 |
| 2,4,6-Trichlorophenol | ND< 12.5 | 2,4-Dinitrophenol | ND< 31.3 |
| Pentachlorophenol | ND< 31.3 | 4,6-Dinitro-2-methylphenol | ND< 31.3 |
| 4-Chloro-3-methylphenol | ND< 12.5 | | |
| ELAP Number 10958 | Metho | d: EPA 625 | Data File: S48231.D |

Comments: ND denotes Non Detect ug / L = microgram per Liter

Signature:

Bruce Hoogesteger: Technical Director



ENVIRONMENTAL SERVICES. INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Volatile Analysis Report for Non-potable Water

Client: OP-Tech

| | Lab Project Number: | |
|------------------|------------------------------------|--|
| | Lab Sample Number: | 14182 |
| FLE-0002 | | |
| excavation-Water | Date Sampled: | 12/16/2009 |
| I/A | Date Received: | 12/17/2009 |
| Vater | Date Analyzed: | 12/21/2009 |
| | FLE-0002 xcavation-Water //A | Lab Sample Number: FLE-0002 xcavation-Water Date Sampled: //A Date Received: |

| Results in ug / L | Halocarbons | Results in ug / L |
|-------------------|--|--|
| ND< 2.00 | trans-1,2-Dichloroethene | ND< 2.00 |
| ND< 2.00 | 1,2-Dichloropropane | ND< 2.00 |
| ND< 5.00 | cis-1,3-Dichloropropene | ND< 2.00 |
| ND< 2.00 | trans-1,3-Dichloropropene | ND< 2.00 |
| ND< 2.00 | Methylene chloride | ND< 5.00 |
| ND< 2.00 | 1,1,2,2-Tetrachioroethane | ND< 2.00 |
| ND< 10.0 | Tetrachloroethene | ND< 2.00 |
| ND< 2.00 | 1,1,1-Trichioroethane | ND< 2.00 |
| ND< 2.00 | 1,1,2-Trichloroethane | ND< 2.00 |
| ND< 2.00 | Trichloroethene | ND< 2.00 |
| ND< 2.00 | Trichlorofluoromethane | ND< 2.00 |
| ND< 2.00 | Vinyl chloride | ND< 2.00 |
| Results in ug / L | Aromatics | Results in ug / L |
| ND< 0.700 | 1,2-Dichlorobenzene | ND< 2.00 |
| ND< 2.00 | 1,3-Dichiorobenzene | ND< 2.00 |
| ND< 2.00 | 1,4-Dichlorobenzene | ND< 2.00 |
| ND< 2.00 | | |
| | ND< 2.00 ND< 2.00 ND< 5.00 ND< 2.00 ND< 2.00 | ND< 2.00trans-1,2-DichloroetheneND< 2.00 |

ELAP Number 10958

Method: EPA 624

Data File: V71279.D

Comments: ND denotes Non Detect ug / L = microgram per Liter

Signature:

Bruce Hoogesteger: Technical Director

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Analytical Report Cover Page

Op Tech Environmental

For Lab Project # 09-4688 Issued December 28, 2009 This report contains a total of 10 pages

The reported results relate only to the samples as they have been received by the laboratory.

Any noncompliant QC parameters having impact on the data are flagged or documented on the final report.

All soil/sludge samples have been reported on a dry weight basis, unless qualified "reported as received". Other solids are reported as received.

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NYSDOH ELAP does not certify for all parameters. Paradigm Environmental Services or the indicated subcontracted laboratory does hold certification for all analytes where certification is offered by ELAP unless otherwise specified.

Data qualifiers are used, when necessary, to provide additional information about the data. This information may be communicated as a flag or as text at the bottom of the report. Please refer to the following list of frequently used data flags and their meaning:

"ND" = analyzed for but not detected.

- "E" = Result has been estimated, calibration limit exceeded.
- "D" = Duplicate results outside QC limits. May indicate a non-homogenous matrix.
- "M" = Matrix spike recoveries outside QC limits. Matrix bias indicated.
- "B" = Method blank contained trace levels of analyte. Refer to included method blank report.



pH Analysis Report

Client: OP-TECH

| Client Job Site: | FLEXO | Lab Project Number: | 09-4688 |
|--------------------|--------------------|----------------------------------|------------------------------|
| Client Job Number: | FF L E-0002 | Date Sampled: Time Sampled: | 12/16/2009 10:45 AM |
| Sample Type: | Water | Date Received: Time Received: | 12/17/2009 1:52 PM |
| Location: | Laboratory | Date Analyzed: Time Analyzed: | 12/16/2009 * 4:40 PM |

| Result (pH) | Field Location | Field Number | Lab Sample Number |
|-------------|----------------|--------------|-------------------|
| 7.79 | Tank #1 | N/A | 14183 |
| | | - | |
| | | | |
| | | | |
| Method: EPA | | | |

ELAP Number 10958

Method: EPA 9045C

Comments Sample was analyzed for pH prior to log-in.

Signature:

Bruce Hoogesteger: Technical Director

ENVIRONMENTAL SERVICES. INC.

Flashpoint by Pensky-Martin Analysis Report

Client: OP-TECH

| Client Job Site: | FLEXO | Lab Project Number: | 09-4688 |
|--------------------|-------|---------------------------------|--------------------------|
| Client Job Number: | N/A | Date Sampled: Date Received: | 12/16/2009 12/17/2009 |
| Sample Type: | Water | Date Analyzed: | 12/22/2009 |

| Lab Sample Number | Field Number | Field Location | Result (°C) |
|-------------------|--------------|----------------|-------------|
| 14183 | N/A | TANK #1 | >70 |
| | | | |
| | | | |
| | | | |

ELAP Number 10958

Method: SW846 1010

Comments:

Signature:

°C = degrees Centigrade

Bruce Hoogesteger: Technical Director



| Client: | OP-TECH | Lab Project No.: | 09-4688 |
|--------------------|-----------|---------------------------------|--------------------------|
| Client Job Site: | FLEXO | Sample Type: | Water |
| Client Job No.: | N/A | Date Sampled: Date Received: | 12/16/2009 12/17/2009 |
| Analytical Method: | EPA 335.4 | Date Analyzed: | 12/22/2009 |

Laboratory Report for Total Cyanide

| | TCN (mg/L) |
|---------|------------|
| Tank #1 | ND<0.01 |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | Tank #1 |

ELAP ID.No.: 10709

Comments:

ND denotes Non Detect.

Approved By Technical Director: _

Bruce Hoogesteger

This report is part of a multipage document and should only be evaluated in its entirety. The Chain of Custody provides additional sample information, including compliance with the sample condition requirements upon receipt



ENVIRONMENTAL SERVICES. INC.

| Client: | <u>OP-TECH</u> | Lab Project No.: Lab Sample No.: | 09-4688 14183 |
|------------------|----------------|-------------------------------------|--------------------------|
| Client Job Site: | FLEXO | · | |
| Client Job No.: | N/A | Sample Type: | Water |
| Field Location: | Tank #1 | Date Sampled: Date Received: | 12/16/2009 12/17/2009 |

Laboratory Report for Reactivity

| Parameter | Date Analyzed | Analytical Method | Results (mg/L) | |
|--------------------------------|---------------|----------------------|----------------|--|
| Cya nid e Reactivity | 12/24/2009 | SW846, 7.3.3.2 | ND<1.0 | |
| Sulfide Reactivity | 12/23/2009 | SW846, 7.3.4.2 | ND<10 | |

ELAP ID. No.: 10709

Comments:

ND denotes Non Detect. Hazardous Waste Regulatory Levels for Reactivity are as follows: Sulfide - 500 mg/kg, Cyanide - 250 mg/kg.

Approved By Technical Director:

Bruce Hoogesteger

This report is part of a multipage document and should only be evaluated in its entirety. The Chain of Custody provides additional sample information, including compliance with sample condition requirements upon receipt.



179 Lake Avenue, Rochester, NY 14608 (585) 647-2530 FAX (585) 647-3311

| Client: | <u>OP-Tech</u> | Lab Project No.: Lab Sample No.: | 09-4688 14183 |
|-------------------------------------|----------------|-------------------------------------|--------------------------|
| Client Job Site: Client Job No.: | FLEXO N/A | Sample Type: | TCLP Extract |
| Field Location: Field ID No.: | Tank #1 N/A | Date Sampled: Date Received: | 12/16/2009 12/17/2009 |

Laboratory Report for TCLP Metals Analysis

| Parameter | Date Analyzed | Analytical Method | Result (mg/L) | Regulatory Limit (mg/L) |
|-------------------|---------------|----------------------|---------------|----------------------------|
| TCLP Metal Series | | | | |
| Arsenic | 12/22/2009 | EPA 6010 | <0.100 | 5.0 |
| Barium | 12/22/2009 | EPA 6010 | <0.100 | 100.0 |
| Cadmium | 12/22/2009 | EPA 6010 | <0.025 | 1.0 |
| Chromium | 12/22/2009 | EPA 6010 | <0.050 | 5.0 |
| Lead | 12/22/2009 | EPA 6010 | <0.100 | 5.0 |
| Mercury | 12/22/2009 | EPA 7470 | <0.0020 | 0.2 |
| Selenium | 12/23/2009 | EPA 6010 | <0.100 | 1.0 |
| Silver | 12/22/2009 | EPA 6010 | <0.050 | 5.0 |
| | | | | |
| | | | | |

ELAP ID No.: 10958

Comments:

Approved By:

Bruce Hoogesteger, Technical Director

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ENVIRONMENTAL SERVICES. INC.

179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

PCB Analysis Report for Non-potable Water

Client: OP-TECH

| Client Job Site: | FLEXO | Lab Project Number: Lab Sample Number: | |
|---|--------------------------------|---|--|
| Client Job Number: Field Location: Field ID Number: Sample Type: | N/A TANK #1 N/A Water | Date Sampled: Date Received: Date Analyzed: | 12/16/2009 12/17/2009 12/22/2009 |

| PCB Identification | Results in ug / L |
|--------------------|-------------------|
| Aroclor 1016 | ND< 1.00 |
| Aroclor 1221 | ND< 1.00 |
| Aroclor 1232 | ND< 1.00 |
| Aroclor 1242 | ND< 1.00 |
| Aroclor 1248 | ND< 1.00 |
| Aroclor 1254 | ND< 1.00 |
| Aroclor 1260 | 1.25 |

ELAP Number 10958

Method: EPA 8082

Comments: ND denotes Non Detect ug / L = microgram per Liter

Signature:

Bruce Hoogesteger: 1 ochnical Director

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional information, including compliance with sample condition 094688F 094688F 094688P1.XLS



ENVIRONMENTAL SERVICES. INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Semi-Volatile Analysis Report for TCLP Extract

Client: OP-TECH

| Client Job Site: | FLEXO | Lab Project Number: Lab Sample Number: | |
|---|---------------------------------------|---|--|
| Client Job Number: Field Location: Field ID Number: Sample Type: | N/A TANK #1 N/A TCLP Extract | Date Sampled: Date Received: Date Analyzed: | 12/16/2009 12/17/2009 12/21/2009 |

| Base / Neutrals | Results in ug / L | Regulatory Limits in ug / L |
|---------------------------|-------------------|-----------------------------|
| 1,4-Dichlorobenzene | ND< 40.0 | 7,500 |
| 2,4-Dinitrotoluene | ND< 40.0 | 130 |
| Hexachlorobenzene | ND< 40.0 | 130 |
| Hexachlorobutadiene | ND< 40.0 | 500 |
| Hexachloroethane | ND< 40.0 | 3000 |
| Nitrobenzene | ND< 40.0 | 2000 |
| Pyridine | ND< 80.0 | 5000 |
| Acids | Results in ug / L | Regulatory Limits in ug / L |
| Cresols (as m,p,o-Cresol) | ND< 80.0 | 200,000 |
| Pentachlorophenol | ND< 100 | 100,000 |
| 2,4,5-Trichlorophenol | ND< 100 | 400,000 |
| 2,4,6-Trichlorophenol | ND< 40.0 | 2000 |
| TI AD Must 40050 | | Data Ellas 040244 |

ELAP Number 10958

Method: EPA 8270C

Data File: S48211.D

Comments: ND denotes Non Detect ug / L = microgram per Liter

Signature:

hatt

Bruce Hoogesteger: Technical Director

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. 09466851.XLS



ENVIRONMENTAL SETTICES. DIC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Volatile Analysis Report for TCLP Extract

Client: OP-TECH

| Client Job Site: | FLEXO | Lab Project Number: Lab Sample Number: | |
|---|---------------------------------------|---|--|
| Client Job Number: Field Location: Field ID Number: Sample Type: | N/A TANK #1 N/A TCLP Extract | Date Sampled: Date Received: Date Analyzed: | 12/16/2009 12/17/2009 12/21/2009 |

| Compounds | Results in ug / L | Regulatory Limits in ug / L |
|----------------------|-------------------|-----------------------------|
| Benzene | ND< 20.0 | 500 |
| 2-Butanone | ND< 100 | 200,000 |
| Carbon Tetrachloride | ND< 20.0 | 500 |
| Chlorobenzene | ND< 20.0 | 100,000 |
| Chloroform | ND< 20.0 | 6,000 |
| 1,2-Dichloroethane | ND< 20.0 | 500 |
| 1,1-Dichloroethene | ND< 20.0 | 700 |
| Tetrachloroethene | ND< 20.0 | 700 |
| Trichloroethene | ND< 20.0 | 500 |
| Vinyl chloride | ND< 20.0 | 200 |
| AP Number 10958 | Method: EPA 8260B | Data File: V71280.D |

Comments: ND denotes Non Detect ug / L = microgram per Liter

Signature:

Bruce Hoogesteger: Technical Director

This report is part of a multipage document and should only be avaluated in its entirety. Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. 094688V1.XLS

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| | | | | | | 179 Lake | Avenue | | | | | | | | | | 585) | 647- | 3311 | | | | | | | | | |
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CWM CHEMICAL SERVICES, LLC

1550 Balmer Road Model City, NY 14107 (716) 286-1550 (716) 286-0211 Fax

FLEXO TRANSPARENT INC ATTN: ENVIRONMENTAL COMPLIANCE DEPT. NYD002100566 1132 SENECA ST BUFFALO NY 14210-1533

CERTIFICATE OF DISPOSAL

.

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from FLEXO TRANSPARENT INC on 12/07/09 as described on Shipping Document number 001055511JJK Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: NY300269 CWM Tracking ID: 8163843101 CWM Unit #: 1*0 Disposal Date: 12/07/09

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

MICHAEL D MAHAR DISTRICT MANAGER Certificate # 336019 12/08/09

For questions please call our Customer Service Dept. at (800) 843-3604

From everyday collection to environmental protection, Think Green? Think Waste Management.

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| ase print or type. (Form designed for use on elite (12-plich) typewriter.) | | | | | For | ्यूः bevoraqA m | . OMB No | . 2050-00 |
| UNIFORM HAZARDOUS I. Generator ID Number WASTE MANIFEST NYD 002100566 | 2. Page 1 of 3. | Emergency Respons 800-225 | e Phone. 1-6750 | 4. Manifest | Tracking I | | | JK |
| 5. Generator's Name and Mailing Address Flexo Transparem Inc. | Ger | erator's Site Address | e (if different t | nan mailing addre | 55) | | | |
| 28 Wasson Street Buffalo, NY 14210 | | | | 1132 S Buffalo | | Street | | |
| Generator's Phone: 716-825-7710 | 1 | 1 | | eunaiv | , 14 1 | | | |
| 6. Transporter 1 Company Name Frice Trucking Corp. | | . <u>.</u> | | U.S. EPA IQ | luniger 2 | 676 | 55 | 74 |
| Price Trucking Corp. | | | | | | 0,0 | <u>.</u> | |
| 7. Transporter 2 Company Name | | | | U.S. EPAID N | lumber | · | | |
| 8. Designated Facility Name and Sile Address | | | | U.S. EPAID N | lumber | | | |
| 1650 Bakmar Road | | | | | | | | |
| Model City, NY 14107 | | | | NY | D 0 4 | 198. | 366 | 79 |
| Facility's Phone: 716-754-8231 | | | | | 5 | (| | |
| Ba. 9b. U.S. DOT Description (Including Proper Shtpping Name, Hazard Class, ID Number And Packing Group (If any)) | r, | 10. Contal | hers | 11, Total | 12. Unit | 13. | Waste Cod | es |
| | | <u>No.</u> | Type | Quantity | Wit.Vol. | 8007 | | T |
| * RQ, Polychlorinated Biphenyl Solid, 9, UN3432, 1 1714 | PG II ERG | 祥 | | 20,001 | | 0007 | • | |
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| ⁴ Service Request # 9202401-2 | | | | | | | | ſ |
| 900401-de | | | | | | | | 35 and 1 |
| 14. Special Handling Instructions and Additional Information | | | L I | | | | | <u>, ''</u> |
| #NY300269 Out of Service Date 12-7-09 J | lob # FFLE | 20002 PC |)浮FF | LÉ0002-(| 38 | | | |
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| | 4010K | | | | | | | |
| GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this marked and tabeled/placarded, and are in all respects in proper condition for transport acc | cording to applicable | international and nati | scribed abova onal govamm | i by the proper shi ental regulations. | oping name If export sh |), and are clas Iomeni and a | isified, paci am the Prin | aged, harv |
| Exporter, I certify that the contents of this consignment conform to the terms of the atlacht I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a land | ed EPA Acknowledgm | ient of Consent. | | | • | | | |
| Generalor's/Offeror's Printed/Typed Name | | | A dominal del | 1812(01) 19 1005. | | Mon | lh Day | Yeau |
| Dovid Groy as Agarit. | Signature | Com Of | 9hr | | | Mon 17 | 217 | 100 |
| 16. International Shipmants | Export from U.S. | Port of en | | | | | | |
| Transporter signature (for exports only); | | Date leavi | | | | | | .• |
| 17. Transporter Acknowledgment of Receipt of Materials | | | | ••••• | | | | |
| Transporter 1 Printed Typed Name | Signatura | Hickory to | 12 | nant | <u>.</u> | Moni | h Day フィーゲ | Year |
| Transporter 2 Prifiled/Typed Name | Signatutg | propriet | 12- | Tranh | w~ | Mon | th Day | |
| | l I | • | | 1 | | 1 |) Day | 1000 |
| 18. Discrepancy / | I | | | | | | | 1 |
| 18a. Discrepancy Indication Space V Quantity Liner failed ppatair | or ebould be | | • | | | | 7 | |
| A decontaminated in a | accordance with | Residue | | Partial Reje | 6809 | L | Full Rej | action |
| (My.ext. jactualised 31010K 40 CFR 761.79. | | Manifest Reference | Number | | | | | |
| 18b./Altarnate Facility (or Generator) | | | | U.S. EPA ID N | mper | | | |
| Provide the second | | | | Ŧ | | | | |
| Facility's Phone: 18c. Signature of Alternata Facility (or Generator) | | | | 1 | | Mor | th Day | Yea |
| and a second for a second for | | | - | | | INSOT | -ui D23) [| 1 1024 |
| 19. Hazardous Waste Report Management Method Codes (I.e., codes for hazardous waste tree | ment disposal and | ecvoling systems) | | | <u> </u> | | <u> </u> | <u> </u> |
| 2. | 3. | ontourid ataronio) | | 4. | | | | |
| H13d | | | | | | | | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials cover | ed by the manifest ex | cept as noted in Item | 18a | | | | | |
| Printed/Typed Nama | Signature | <i>t</i> , | / | | | Mon | th Day | Year |
| | , 1h. | Inta k | | | | 12 | | ſЯ |

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

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CWM CHEMICAL SERVICES, LLC

1550 Balmer Road Model City, NY 14107 (716) 286-1550 (716) 286-0211 Fax

FLEXO TRANSPARENT INC ATTN: ENVIRONMENTAL COMPLIANCE DEPT. NYD002100566 1132 SENECA ST BUFFALO NY 14210-1533

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from FLEXO TRANSPARENT INC on 12/07/09 as described on Shipping Document number 001055510JJK Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: NY300269 CWM Tracking ID: 8163841301 CWM Unit #: 1*0 Disposal Date: 12/07/09

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

MICHAEL D MAHAR DISTRICT MANAGER Certificate # 336004 12/08/09 For questions please call our Customer Service Dept. at (800) 843-3604

From everyday collection to environmental protection, Think Green? Think Waste Management.

| Ple | ase | rint or type. (Form designed for use on elile (12-pitch) typewriter.) | | | | | Fon | m Approved. O | MB No. 2050-0039 |
|----------------------|-------------|---|---------------------------------------|---|--------------------|---------------------|--------------------|---------------------|--------------------|
| | UN V | IFORM HAZARDOUS 1. Generator ID Number 2.1.0.0.5.6.6 VASTE MANIFEST 1. Generator ID Number 2.1.0.0.5.6.6 | | 3. Emergency Respor | | 4. Manifes | 105 | 5510 |] |
| | 5 | enerator's Name and Mailing Address | | Senerator's Sile Addre | ss (if different t | han mailing adore | 155) 2012 2 2 2 | čirazi | |
| | 2 | Wasson Street Buffalo, NY 14210 716-825-7710 | | | | Buffaid | | આદલ્શ | |
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| | | 0 Balmar Road Jel City, NY 14107 | | | | NT 37 | ጉ ለ ፈ | 603 | 6679 |
| | 1 | ity's Phone; 718-7164-8291 | | | | 14 1. | DV4 | . 707 | 00/2 |
| | ₽a. | 9b. U.S. DOT Description finduding Proper Shipping Name, Hazard Class, ID Number, | | 10. Cont | ainers | 11. Totai | 12. Unit | | |
| | HM | and Packing Group (if any)) | | No. | Туре | Quantity | Wt.Vol. | | sle Codes |
| ğ | x | 1. RQ, Polychlorinated Biphenyl Solid, 9, UN3432, P | G II ERG |) # | | 30,000 | | 3007 (. | |
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| | | * Service Request # O O o days | | | - | | | | |
| | | Service Request # 920407-1 | | | | | | | |
| | | pecial Handling Instructions and Additional Information | | | _ I , | | L1 | i | |
| | 除卜 | IV300269 Out of Service Date 12-7-09 Jo | ob # FFL | E0002 P | O#FF | LE0002- | 08 | | |
| | ļγ | 31638413. reci | 1 20 | 1234 | | | | | |
| | 15. | GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declaro that the contents of this | consignment are | fully and accuraisiv d | escribed above | by the proper sh | ipping name | , and are classifie | d, packaged, |
| | | marked and labeled/placarded, and are in all respects in proper condition for transport according Exporter. I certify that the contents of this consignment conform to the terms of the attacher | ording to applicab d FPA Acknowled | le international and na oment of Consent | tional governm | iental regulations. | If export shi | pment end I am t | he Primary |
| | | L certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large rator's/Offeror's Printed/Typed Name | e quantity genera | lor) or (b) (if I am a sn | iali quantity gei | nerator) s true. | | | Day March |
| Ţ | 2 | avid Gray US Ayen - | Signal | | ale | | | Month | Day Year 17 C.1 |
| - | 16. la | | Export from U.S. | Port of e | | | | | |
| Z | | sporter signature (for exports only); | | Dale lear | ring U.S.: | ······ | | | |
| 5 | | ansporter Acknowledgment of Receipt of Materials gbrier 1 Printed/Typed Name | Signal | | | | | Hanth | Day Vees |
| Ž | ٤., | laures MCGere | | Par La | Or. | | | Month | Day Year |
| I KANSPORTER | Trans | porter 2 Printed/Typed Name | Signat | JIG OF | And - | <u>i_</u> . | | Month | Day Year |
| | 40 M | <u> </u> | / | | | | | | |
| † | | screpancy : Discrepancy Indication Space | | | | | | | |
| | | Quantity L Type | | Reskfue | | Partial Reje | ction | LIF | uli Rejection |
| | 10. | | | Manifest Referenc | e Number: | | | | |
| Ę | 160.7 | Itemale Facility (or Generator) | | | _ | U.S. EPA ID N | umber | | |
| Z | Facili | y's Phone: | | | | 1 | | | |
| UEDIGINALEU FACILITY | | ignature of Alternate Facility (or Generator) | | | | l | | Month | Day Year |
| EN S | | | | | | | | | |
| ŝ | 19. H 1. | zzardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatin | | d recycling systems) | | | | | |
| - | " | +132 1 | 3. | | | 4. | 2 | | |
| | 20. D | signaled Facility Owner or Operator: Certification of receipt of hazardous materials covered | l by the manifest | except as noted in Iter | n 18a | I | | | |
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DESIGNATED FACILITY TO GENERATOR

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| | 7. Transporter 2 Company Nar | · . | | | U.S. EPAID | 19QUUR | | |
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| | 3. | | ····· | | | | | |
| | 4. Service Req | uest# 920407-1 | | | | | | |
| | 14. Special Handling Instruction | s and Additional Information | ····· | | | | | |
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| | 18a. Discrepancy Indication Span | Ce Cuantity |] <i>t</i> ype [| Residue | Partial Rejoc | tion | E Full | Relaction |
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| ESIGN | 19. Hezardous Waste Report Mar | nagement Method Codes (i.o., codes for hazardous | waste lreatment, disposal, and rec | rcling systems) | | | <u> </u> | |
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| | 20. Designated Facility Owner or Printed Typed Name | Operator, Certification of receipt of hazardous mate | lais covered by the manifest excep | tas noted in liem fila | | | | ey Year |
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DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

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| 155 | 50 Balmer Road | | | | | | | | |
| | del City. NY 14107 Rysphona; 716-754-8231 | | 3 | | NY | D 0 4 | 498 | 366 | 7 |
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| нм | and Packing Group (if any)) | | No. | Type | 11. Total Quantity | 12. Unit WL/Vol. | 13 | 3. Waste Cod | 85 |
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| 7. Transporter 2 Company Name | ė | | | | U.S. EPA I | | |
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| 1 | NON-HAZARDOUS WASTE MANIFEST | 1. Generator ID Number | 2. Page 1 of 3. Em | | | í I | Tracking No | |
|--|---|---|------------------------------|-----------------------|--|---------------------------------|----------------|---|
| 5. | Generator's Name and Mailing | g Address | Genen | utor's Site Address (| C 3 3 9 / | <u>sica da</u> A mailina add | [ress] | <u>18 201643</u> |
| | Tions Transp | erant Inc., , 28 Mess. | en g | lexo Iran: | | | | 2 360000 |
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| | enerator's Phone: Transporter 1 Company Name | <u> </u> | | | | U.S. EPA ID | Number | |
| | Besied Truck. 745- | and area | | | I | | 44 D.23 | Ē, |
| 7. | Transporter 2 Company Name | | | · | ۱ــــــــــــــــــــــــــــــــــــ | U.S. EPA ID | Number | |
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| Fac | Tonawanda NV dRys Phone: | 712-723 | -3656 | | 1 | | | • • • |
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| | 2. | FREE JUTERIN MORTH IR | B #2, , , | | | | | |
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DESIGNATED FACILITY TO GENERATOR

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Flexo Transparent, Inc. REMEDIAL INVESTIGATION REPORT

Appendix D

Test Pit Logs, Soil Boring Logs, and Monitoring Well Construction Logs



6105002 / BUF

| MALCO PIRNI | LM E | | | | |
|--|---|--------------------------|---|---------------------------------------|--|
| Project: Project No.: Client: Location: | Flexo-Transparent RI 6105-002 Flexo-Transparent RI Buffalo | Excavati Logged / | on Dates: on Method: Checked By: Location #: | 10 | //14/2009 //14/2009 JPH - 1 |
| Test Pit Loc | ation: | Test Pit | Cross Section | n: | |
| RITP- | | Grade 0.5 1.0 | | | |
| | Warehouse Bldg | 1.5 2.0 2.5 3.0 | | 2.5' | Fill |
| | | 3.5 4.0 4.5 5.0 | | | Native Soil |
| 1132 Seneca | 1146 Seneca | | | | |
| Depth bgs 0.0 - 2" | Soil Description Asphalt | Graphic Log | Photos Y / N | Samples Y / N | Comments (Include seepage horizons) |
| 2" - 1.4' | Fill as Gravel and crushed stone | | | | Wet |
| 1.4' - 2.5 | Fill as Silt and Sand, black, fine grain | | | Y | Saturated |
| 2.5' - 3.3' | Native soil, Sand and Silt, gray-black, fine grain | | | ······ | PID = 0.0 ppm |
| | | | | | |
| | | | | ······· | RITP-1 (1.4 - 2.0') |
| | | | | | Soil sample collected for: TCL VOCs SVOCs/PCBs TAL Metals |
| | | | | | Cyanide |
| | | | | · · · · · · · · · · · · · · · · · · · | |
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| Project: Project No.: Client: Location: | Flexo-Transparent RI 6105-002 Flexo-Transparent RI Buffalo | Excavat Logged | ion Dates: ion Method: / Checked By Location #: | 10/ | /14/2009 /14/2009 JPH - 2 |
| Test Pit Loca | ution: | Test Pi | it Cross Sectio | n: | |
| X RITP-2 | Warehouse Bldg | Grade 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 5.0 | | 2.2' | Fill Native Soil |
| 1132 Seneca | 1146 Seneca | | <u></u> | | |
| Depth bgs 0.0 - 2.2' | Soil Description | Graphic Log | Photos Y / N | Samples Y / N Y | Comments (Include seepage horizons) |
| | Fill as Sand and Gravel, black-brown, fine grain w/ f - crs. angular gravel & crushed stone, some Fe staining, w/ brick, ash, rubber | | | Y | Wet |
| 2.2' - 3.2' | Native soil, Silt dark gray, w/ little fine Sand, trace | | | | Saturated Perched water at native soil contact |
| | | | | ······································ | Collected soil sample(s) RITP-2 (0.0 - 2") RITP-2 (1.5 - 2.0') |
| | | | | | Soil samples collected for: TCL VOCs SVOCs/PCBs TAL Metals Cyanide |
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| Project: Project No.: Client: Location: | Flexo-Transparent RIExcavation Dates:10/14/20096105-002Excavation Method:10/14/2009Flexo-Transparent RILogged / Checked By:JPHBuffaloTest Pit Location #:RI TP - 3 | | | 14/2009 JPH | | |
| Test Pit Loca | lion: | Test Pit Cross Section: | | | | |
| | RITP-3 | Grade | | | | |
| | | 0.5 | د ها کا خا کا کا کا کا کا کا کا کا کا کا کا کا کا | | | |
| | | 1.0 1.5 | | 1.6' | Fill | |
| | Warehouse | 2.0 | | 1 | - 1 | |
| | Bldg | 2.5 | | | Native Soil | |
| | | 3.0 | | | | |
| | | 3.5 | | | <i>7 2</i> | |
| | | 4.0 | | | | |
| | | 4.5 | * | ا کا خاخا خاخا خاخا کا ہے ہے ہے جن کے ا | یہ ان کا کا ان کا ہے ہے ہے جاتا ہے ہے ہے جاتا ہے کا ان کا کا کا | |
| | | 5.0 | | | | |
| 1132 Seneca | 1146 Seneca | | | | | |
| Depth | Soil | Graphic | Photos | Samples | Comments | |
| bgs | Description | Log | Y / N | Y / N | (Include seepage horizons) | |
| 0.0 - 1.6' | | | | Y | Moist - wet | |
| | Fill as Silt and Sand, black-gray, fine grain w/ C&D debris as red brick, f angular gravel, sharp contact w/ | | | | | |
| | deoris as red brick, i angulai gravel, sharp contact w | | | Y | PID = 0.0 ppm | |
| 1.6' - 3.1' | Native soil, Silt and Sand, yellow-brown, fine grain | | | | Saturated | |
| | | | | | Perched water at native soil contact | |
| | | | | | | |
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| | | | | | | |
| | | | | | | |
| | | | | | Collected soil sample(s) RITP-3 (0.0 - 2") | |
| | | | | | RITP-3 (1.0 - 1.5') | |
| | | <u> </u> | | | | |
| | | | | | Soil samples collected for: | |
| | | | | | TCL VOCs | |
| | | | | | SVOCs/PCBs | |
| | | | | | TAL Metals | |
| | | | | | Cyanide | |
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| Project: Project No.: Client: Location: | Flexo-Transparent RI : 6105-002 Flexo-Transparent RI Buffalo | | cavation Method: | | 10/14/2009 10/14/2009 JPH TP - 4 | |
| Test Pit Loca | tion: | Test P | it Cross Secti | on: | | |
| | RITP-4 | Grade | 1 | | | |
| | Warehouse | 0.5 1.0 1.5 2.0 |) | 1.7' | Fill | |
| | Bldg | 2.5 3.0 3.5 4.0 4.5 5.0 | | | Native Soil | |
| 1132 Seneca | 1146 Seneca | | | | | |
| Depth bgs | Soil Description | Graphic | | Samples | Comments | |
| 0.0 - 1.7' | Fill as Gravel railroad ballast consisting of fine, angular crushed stone, w/ trace-little Silt, black-brown, sharp contact w/ Native soil, Silt, lt. gray-yellow, trace fine grain Sand, | | Y/N | Y / N Y | (Include seepage horizons) | |
| | mottled | | | | Saturated Perched water at native soil contact | |
| | | | | | | |
| | | | | | Collected soil sample RITP-4 (1.0 - 1.5') | |
| | | | | | Soil samples collected for: TCL VOCs SVOCs/PCBs | |
| | | | | | TAL Metals Cyanide | |
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| Project: Project No.: Client: Location: | 6105-002 | | | on Dates: on Method: Checked By: location #: | 10/1 | 14/2009 14/2009 JPH 5 |
| Test Pit Loca | tion: | RI TP-5 | Test Pit | Cross Section | : | |
| | | x | Grade | | · | |
| | | · · | 0.5 | · | _ | |
| | | i | 1.0 1.5 | | -í | |
| | Warehouse | | 2.0 | | -/ | / |
| | Bldg | | 2.5 | | | |
| | U U | | 3.0 | | -¶ / | |
| | | | 3.5 | | <u>]</u> | Fill |
| | | 1 | 4.0 | | <u>[3.7</u>] | _ <u>(</u> |
| | | | 4.5 | | - í | Native Soil |
| | | · | 5.0 | | | ,,,,,,, |
| 1132 Seneca | | 1146 Seneca | | | | |
| Depth | | Soil | Graphic | Photos | Samples | Comments |
| bgs | | Description | Log | Y/N | Y / N | (Include seepage horizons) |
| 0.0 -3.7' | Fill as Silt and | Sand, dark gray-black, fine grain w/ | | | Y | |
| | | debris consisting of brick, concrete, | | | | Strong solvent odor No PID measurment |
| | plastic and woo | d, sharp contact w/ | | | | recorded in fill unit |
| | | | 1 | | | |
| 3.7' - 5.1' | Native soil, Silt | and Sand, olive gray-brown, mottled, | | | | Moist-wet |
| | fine grain w/ ca | rbonized plant fragments. | | | Y | Perched water at native soil contact |
| | | | | | | Max. PID 2.1 ppm measured in native soil. |
| | | | | | | |
| | | | | | | |
| | | | _ | | | Collected soil sample(s) RITP-5 (0.0 - 2") |
| | | | + | | | RITP-5 (0.0 - 2") RITP-5 (3.5 - 4.5') |
| | | 1 | - | | | (0.0-4.0) |
| | | · · · · · · · · · · · · · · · · · · · | | | | Collected soil duplicate |
| | | | | 1 | | RI TP-Dupl #I at 3.5 - 4.5' |
| | | | | | | |
| | | ······································ | | | | depth |
| | · · · · · · · · · · · · · · · · · · · | | | | | |
| | | ······································ | | | | depth |
| | | - · · · · · · · · · · · · · · · · · · · | | | | depth Soil samples collected for: |
| | | | | | | depth |
| | | | | | | depth Soil samples collected for: TCL VOCs |
| | | | | | | depth Soil samples collected for: TCL VOCs SVOCs/PCBs |
| | | | | | | depth Soil samples collected for: TCL VOCs SVOCs/PCBs TAL Metals |
| | | | | | | depth Soil samples collected for: TCL VOCs SVOCs/PCBs TAL Metals |
| | | | | | | depth Soil samples collected for: TCL VOCs SVOCs/PCBs TAL Metals |
| | | | | | | depth Soil samples collected for: TCL VOCs SVOCs/PCBs TAL Metals |

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| Project: Project No.: Client: Location: | Flexo-Transparent RI 6105-002 Flexo-Transparent RI Buffalo | Excavation Dates: Excavation Method: Logged / Checked By: Test Pit Location #: | | | /14/2009 /14/2009 JPH - 6 |
| Test Pit Loca | | Test P | it Cross Section | on: | |
| | RI TP-6 x Warehouse Bldg | Grade 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 | | 3.7' | Fill |
| | | 4.5 | | | Native Soil |
| 132 Seneca | 1146 Seneca | 5.0 | l | | |
| Depth bgs | Soil Description | Graphic | Photos | Samples | Comments |
| .0 -3.7' 7' - 4.8' | Fill as Sand and Gravel, black, fine grain w/ med- crs. Gravel to 1" dia. significant Fe staining, admixed debris as wood, brick and clay tile pipe Native soil, Silt dark gray w/ carbonized plant mat'l, grading to dark gray Silt and fine grain Sand | | Y / N | Y/N N N | (Include seepage horizons) Wet PID = 0.0 ppm Moist-wet Perched water at native soil |
| | | | | | contact Exposed 6" clay pipe w/ N-S orientation at approx. 3.5' bgs in original test pit excavation. |

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| Project: Project No.: Client: Location: | Flexo-Transparent RI 6105-002 Flexo-Transparent RI Buffalo | Excavati Logged / | on Dates: on Method: / Checked By: Location #: | 10/1 | 15/2009 15/2009 JPH 7 | | |
| Test Pit Locat | ion: RI TP-7 | Test Pit Cross Section: | | | | | |
| | | Grade | | | | | |
| | | 0.5 | | | | | |
| | | 1.0 1.5 | | ·· í | | | |
| | Warehouse | 2.0 | | | / Fill | | |
| | Bldg | 2.5 | | 2.3' | ····// | | |
| | | 3.0 | | | | | |
| | | 3.5 | | | Native Soil | | |
| | | 4.0 | | |] | | |
| | | 4.5 5.0 | • • | _ | <u> </u> | | |
| 1132 Seneca | 1146 Seneca | 5.0 | I | | | | |
| Depth | Soil | Graphic | Photos | Samples | Comments | | |
| bgs | Description | Log | Y/N | Y/N | (Include seepage horizons) | | |
| 0.0 -2.3' | Fill as Sand and Gravel, black, fine-med. grain w/ fine - | | | Y | | | |
| | med. Gravel to 1/2" dia., admixed debris as wood, brick | | | | Wet - Sat. | | |
| l | and metal, Fe stained interbed | | | | = PID = 0.0 ppm | | |
| | · · · · · · · · · · · · · · · · · · · | | | | • | | |
| 3.7' - 4.5' | Native soil, Silt dark gray w/ carbonized plant mat'l, | | | N | | | |
| | grading to dark gray Silt and fine grain Sand | | | | Perched water at native soil contact | | |
| | | | | <u> </u> | Collected soil sample(s) | | |
| | | | | | RITP-7 (0.0 - 2") | | |
| | | | | | | | |
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| | | | | | Soil samples collected for: | | |
| | | | | | SVOCs/PCBs | | |
| | | | | | TAL Metals | | |
| | | | | | Cyanide | | |
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| Project: Project No.: Client: Location: | Flexo-Transparent RI 6105-002 Flexo-Transparent RI Buffalo | | Excavation Dates: Excavation Method: Logged / Checked By: Test Pit Location #: | | y:10 | 10/15/2009 10/15/2009 JPH RI TP - 8 | | |
| Test Pit Loca | ation: | · | Test Pit Cross Section: | | | | | |
| | Warehouse Bldg | RI TP-8 x | Grade 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 | | 1.2' | Fill Native Soil | | |
| 132 Seneca | | 1 146 Seneca | 5.0 | | | | | |
| Depth bgs 0.0 - 1.2' | Fill as Sand and grain w/ fine gr | Soil Description d Gravel, dark brown, fine-medium avel to 1/2" dia., some Fe staining, | Graphic Log | Photos Y / N | Samples Y / N Y | Comments (Include seepage horizons) Moist - Wet | | |
| 2' - 2.7' | Native soil, Silt | lt. brown-yellow, trace- little fine Sand | | | N | Saturated Perched water at native soil contact | | |
| | | | | | | PID = 0.0 ppm | | |
| | | | | | | Collected soil sample(s) RITP-8 (0.5 - 1.2') | | |
| | ······································ | | | | | Soil samples collected for: TCL VOCs SVOCs/PCBs TAL Metals | | |
| | | | | | | Cyanide | | |
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| Project: Project No.: Client: Location: | Flexo-Transp 6105-00 Flexo-Transp Buffal | 02 arent RI | Logged / | on Dates: on Method: Checked By: Location #: | 10/1 | 5/2009 5/2009 IPH 9 |
| Test Pit Locat | tion: | | Test Pit | Cross Section | 1: | |
| | 1 | | Grade | | | |
| | | | 0.5 | | | |
| | | RI TP-9 | 1.0 | | | |
| | 1 | Х | 1.5 | | | |
| | Warehouse Bldg | | 2.0 2.5 | | _ _ | Fill |
| | Blug | | 3.0 | | 2.7' | |
| | İ | | 3.5 | | | Native Soil |
| | | | 4.0 | | _/ 1 | / |
| | | | 4.5 | | ······································ | * |
| | | | 5.0 | | | |
| 1132 Seneca | | 1146 Seneca | | | | |
| Depth | | Soil | Graphic | Photos | Samples | Comments |
| bgs | De | escription | Log | Y/N | Y / N | (Include seepage horizons) |
| 0.0 -2.7' | Fill as Silt and Sand day | k gray-black, fine grain w/ | | | Y | |
| | | nsisting of brick, concrete, | | | | |
| | plastic and wood, sharp | | | | | |
| | ····· | ····· | | | | Moist |
| 2.7' - 3.8' | Native soil, Silt, med. gr | av. w/ carbonized plant | | ···· | | |
| | | llow-brown Sand and Silt, | | | Ν | |
| | trace Clay. | | | | | |
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| ····· | | ··· · | | | | |
| | | · | | | | |
| | | | + + | | | Collected soil sample(s) |
| | ····· | | - | | | RITP-9 (0.0 - 2") |
| | | | | | | and ms/msd |
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| | | | | | | Soil samples collected for: |
| | | | | | | |
| | | | | | | SVOCs/PCBs |
| | | | | | | TAL Metals |
| | | | | | | Cyanide |
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| Project: Project No.: Client: Location: | Flexo-Transparent RI .: 6105-002 Flexo-Transparent RI Buffalo | | Excavat Logged | ion Dates: ion Method: / Checked By Location #: | 1 | 0/15/2009 0/15/2009 JPH 2 - 10 |
| Test Pit Loca | ation: | · -,····· - · · · · · · · · · · · · · · | Test Pi | t Cross Sectio | n: | |
| | Warehouse Bldg | RI TP-10 x | Grade 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 5.0 | | 0.8' | Fill Native Soil |
| 132 Seneca | | 1146 Seneca | | | | |
| Depth bgs | | Soil Description | Graphic Log | Photos Y / N | Samples Y / N | Comments (Include seepage horizons) |
| .0 - 0.8 | Fill as Silt, dark Clay | brown w/ little fine grain Sand, trace | | | Y | Moist - wet PID = 0.0 ppm |
| 8' - 2.5' | Native soil, Silt gradation to Silt | moderate brown, w/ downward and Sand matrix, Fe stained mottling | | | ······· | |
| | | | | · | ······ | |
| | | | | | | Collected soil sample(s) RITP-10 (0.0 - 2") |
| | | | | | | Soil samples collected for: |
| | ······ | | | | | SVOCs/PCBs TAL Metals Cyanide |
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| Project: Project No.: Client: Location: | Flexo-Transparent RI : 6105-002 Flexo-Transparent RI Buffalo | | Excavation Dates:10/15/2009Excavation Method:10/15/2009Logged / Checked By:JPHTest Pit Location #:RI TP - 11 | | | | | |
| Test Pit Loca | tion: | ······································ | _ Test Pit Cross Section: | | | | | |
| | Warehouse Bldg | RI TP-11 x | Grade 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 5.0 | | 1.4' | Fill Native Soil | | |
| 1132 Seneca | | 1146 Seneca | | | | | | |
| Depth bgs 0.0 - 1.4' | Soil Description | | Graphic Log | Photos Y / N | Samples Y / N N | Comments (Include seepage horizons) Dry - Moist | | |
| I.4' - 2.8' | brown Sili, trace | d Silt roadbase to 2" dia., dark gray- - little fine Sand, sharp contact w/ light brown-orange, mottled, trace- | | | N | PID = 0.0 ppm Moist | | |
| | little Sand and C | | | | | | | |
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| Project: Project No.: Client: Location: | 6105- Flexo-Tran | ransparent RIExcavation Dates:05-002Excavation Method:ransparent RILogged / Checked By:ouffaloTest Pit Location #: | | :1 | 0/15/2009 0/15/2009 JPH 2- 12 | |
| Test Pit Loc | Test Pit Location: | | | t Cross Sectio | n: | |
| | Warehouse Bidg | x RI TP-12 | Grade 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 5.0 | | 0.5 | Fill Native Soil |
| 1132 Seneca | 1 | 1146 Seneca | | | | |
| Depth bgs 0.0 - 0.5' | | Soil escription rown, trace fine Sand, admixed ick | Graphic Log | Photos Y / N | Samples Y/N N | Comments (Include seepage horizons) Moist PID = 0.0 ppm |
| 0.5' - 3.0' | Native soil, Silt, light br to Clay-Silt @ 2.7' bgs, | own-orange, mottled, grading stiff, dense | | | N | Moist |
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| Project: | Flex | ko-Transparent RI | Excavati | on Dates: | 10 | 10/15/2009 | | |
| Project No.: | | 6105-002 | | on Method: | | 10/15/2009 | | |
| Client: | | | | / Checked By: | | | | |
| Location: | | Buffalo | Test Pit I | Location #: | RI TP - | - 13 | | |
| Test Pit Loca | Test Pit Location: | | | - Test Pit Cross Section: | | | | |
| | | | Grade | | | | | |
| | | | 0.5 | | | | | |
| | | | 1.0 1.5 | | 1.5' | Fill | | |
| | Warehouse | 1 | 2.0 | | 1 | | | |
| | Bldg | | 2.5 | | | Native Soil | | |
| | | | 3.0 | | ···· | | | |
| | | x | 3.5 | | | | | |
| | | RI TP-13 | 4.0 | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | | | | |
| | | | 4.5 5.0 | ,~~_~~~ | | | | |
| | | · | • | I | | | | |
| 1132 Seneca | | 1146 Seneca | | | | | | |
| Depth | | Soil | Graphic | 1 I | Samples | Comments | | |
| bgs | | Description | Log | Y/N | Y/N | (Include seepage horizons) | | |
| 0.0 - 1.5' | | | | | Y | Moist | | |
| | Fill as Silt, dark gray-brown Silt, trace-little fine Sand and Gravel to 1" dia., sharp contact w/ | | | | | | | |
| | | | ····· | | | PID = 0.0 ppm | | |
| | | | _ | | NT. | N/a lat | | |
| 1.5' - 3.2' | Native soil, C | lay and Silt buff brwn-red, stiff, dense | | | N | Moist | | |
| | | | | | | | | |
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| | | | | | | | | |
| | | | | | | Collected soil sample(s) | | |
| | | | | | | RITP-13 (0.0 - 2") | | |
| | | | | | ***** | (0,0 -) | | |
| | | · · · · · · · · · · · · · · · · · · · | | | | | | |
| | | | | | | Soil samples collected for: | | |
| | | | | | | SVOCs/PCBs | | |
| | | | | | | TAL Metals | | |
| | | · Westernick Market aver - | | | | Cyanide | | |
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| Project: Project No.: Client: Location: | Flexo- Flexo- | Transparent RI 105-002 Transparent RI Buffalo | Excava Logged | tion Dates: tion Method: / Checked By Location #: | y: | 10/15/2009 10/15/2009 JPH 2- 14 |
| Test Pit Loca | ation: | | Test P | it Cross Section | on: | |
| | Warehouse Bldg | | Grade 0.5 1.0 1.5 2.0 2.5 3.0 | | 1.4' | Fill Native Soil |
| 1132 Seneca | | x | 3.5 4.0 4.5 5.0 | | | |
| Depth bgs 0.0 - 1.4' | | Soil Description | Graphic Log | Photos Y / N | Samples Y / N Y | Comments (Include seepage horizons) Moist |
| | Fill as Silt, dark gr Gravel, sharp conta | ay-brown , trace -little fine Sand and act w/ | | | | PID = 0.0 ppm |
| .4' - 2.4' | Native soil, Sand, b sharp contact w/ | brown-orange, fine grain, trace Silt | | | N | Moist |
| .4' - 3.8' | Clay, buff-brown, s | tiff, dense, trace Silt | | | | |
| | | | | | | North - South trending 2" dia soil filled steel pipe identified. No PID measurements recorded |
| | | | | | | Collected soil sample(s) RITP-14 (0.0 - 2") |
| | | | | | | Soil samples collected for: |
| | | | | | · · · · · · · · · · · · · · · · · · · | SVOCs/PCBs TAL Metals Cyanide |
| | | | | | ···· | |
| | ······································ | | | ······································ | | |

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| Project: Project No.: Client: Location: | Flex | o-Transparent RI 6105-002 o-Transparent RI Buffalo | Logged / | on Dates: on Method: Checked By: Location #: | 10/ | /16/2009 /16/2009 JPH 15 |
| Test Pit Loca | tion: | | Test Pit | Cross Section | 1: | |
| 1132 Seneca | Warehouse Bldg | x RI TP-15 1146 Seneca | Grade 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 5.0 | | 2.4' | Fill Native Soil |
| | 1 | | | DI . | 0 1 | <u> </u> |
| Depth | | Soil Description | Graphic Log | Photos Y / N | Samples Y / N | Comments (Include seepage horizons) |
| bgs 0.0 - 0.7' | Fill as Slag an | d Gravel to 2" dia. | LUg | 171 | N | Moist |
| 0.0 0.1 | T in as sing un | | | | | |
| | | | | | | PID = 0.0 ppm |
| 0.71 0.41 | | - + Cile 2 2" die ookblee wij deele ereet | | | N | Moist |
| 0.7' - 2.4' | black Silt, sha | and Silt, 2-3" dia. cobbles w/ dark gray- | | | IN | Worst |
| | ondon only one | P | | | | · · · · · · · · · · · · · · · · · · · |
| 2.4' - 3.4' | Native soil Si | lt and Sand, light brown, fine, trace Clay | | | | ···· |
| | | it and band, right brown, rine, ridee endy | | | | |
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| Sheet | of | | | | | |

| MALCO | ĻM | | - 78112 - 18102 | | n <u>, 1997 - 1997 - 1997 -</u> | |
|--|-------------------|---|---|---|---------------------------------|--|
| Project: Project No.: Client: Location: | Flexe | o-Transparent RI 6105-002 o-Transparent RI Buffalo | Excava Logged | ation Dates: ation Method: d / Checked E t Location #: | s1 | 10/16/2009 0/16/2009 JPH 2 - 16 |
| Test Pit Loca | ation: | | Test F | Pit Cross Sect | ion: | |
| 1132 Seneca | Warehouse Bidg | RI TP-16 | Grade 0.: 1.0 1.2 2.0 2.5 3.0 3.5 4.0 4.5 5.0 | D 5 5 5 5 5 5 5 5 | 1.2' | Fill Native Soil |
| | | | | | | |
| Depth bgs | | Soil Description | Graphic Log | Photos Y / N | Samples Y / N | Comments (Include seepage horizons) |
| 0.0 - 1.2' | w/ plastic, wood, | gray-brown, trace fine Sand admixed and clay tile, sharp contact w/ t. brown, trace Sand and Clay | | | N | Moist —— PID = 0.0 ppm |
| | | | | | | |
| | | | | | | |
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| Sheet of | | | | | | |

| MALCOL | М | | | | | |
|--|-------------------|--|---|---|-----------------|---|
| Project: Project No.: Client: Location: | | ko-Transparent RI 6105-002 ko-Transparent RI Buffalo | Logged / | on Dates: on Method: Checked By: Location #: | 10 | /16/2009 /16/2009 JPH - 17 |
| Test Pit Loca | Warehouse Bldg | RI TP-17 | Test Pit Grade 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 5.0 | Cross Section | n: | Fill Native Soil |
| 1132 Seneca | L | 1146 Seneca | - | | | |
| bgs 0.0 - 1.2' | stone, sharp c | Description ark gray, little fine Gravel and crushed ontact w/ ilt lt. yellow-brown, trace fine Sand and | | Y / N | Y / N N N | (Include seepage horizons) Moist PID = 0.0 ppm |
| | | | | | | |

| MALCO | M | | | | · · · · · | |
|--|---------------------------------------|---|---|--|------------|---|
| Project: Project No.: Client: Location: | | o-Transparent RI 6105-002 o-Transparent RI Buffalo | Excavat Logged | tion Dates: tion Method: / Checked By Location #: | 1(| 0/16/2009 0/16/2009 JPH - 18 |
| Test Pit Loca | ation: | ·] — - — - — - — - — - — - — - — - | Test Pi | it Cross Sectio | n: | |
| | Warehouse Bldg | RI TP-18 | Grade 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 5.0 | | 1.2' | Fill Native Soil |
| 1132 Seneca | | 1146 Seneca | | | | |
| Depth | | Soil | Graphic | 1 1 | Samples | Comments |
| bgs | | Description | Log | Y/N | Y / N N | (Include seepage horizons) Moist |
| | | gray-brown, trace-little fine Sand and w/brick and wood, sharp contact w/ | | ······ | | PID = 0.0 ppm |
| 1.2' - 3.4' | | , yellow-brown, trace-little Sand, trace downward to Clay-silt | | ······ | Y | |
| | | | | ····· | | |
| | | | | | | ······································ |
| | | | | | | RITP-18 (0.5 - 1.0') |
| ······································ | · · · · · · · · · · · · · · · · · · · | | | | | Soil samples collected for: TCL VOCs SVOCs/PCBs |
| | | | | | | TAL Metals Cyanide |
| | · | | | | | Collected ms/msd |
| | | | | | | |
| | | | | | | |
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| Sheet c | f | | | | | |

| Project : | Else- r | | | | | Borehole No.: | RIB- | | |
|--------------------------|---|---|---------------------------------------|--|--|---------------|--|---------------------|----------|
| rioject | Flexo F | U Investigation | Surface Elev.: | | Date Started | | | | |
| Project No.: | 6105-00 | 02 | Ref. Elev.: Contractor: | | Date Finished | 10/ / 1/2009 | | | |
| Client: | Flexo T | ransparent, Inc. | Driller: | Earth Dimensions, Inc. | Drilling Method | Direct push | ····· | ········ | ······· |
| Location: | Buffalo | , NY | Rig Type: | Deitrich D-50 | Water Depth (bgs) | | | | *** |
| | | le e | | | Logged By | JPH | | | <u> </u> |
| bepur (BOS) Sample (D | Sample Type Blows / 6 inches Recovery / 1 enoth | (ft.) Soll Classification Symbol (Include denths) (Include | | | | | Wert. | <u> </u> | Т |
| Sample ID | Sample Type Blows / 6 incl | o (lassi | | T (1) - | | | | PID Scan (ppm) | |
| Sam | Sam Blow Reco | (ft.) Soil (Symt | Density | Lithology Description | and Remarks | | Maisture (dry, moist satterated) | Scan (| 1 |
| | | +++++++++++++++++++++++++++++++++++++++ | T // | Consistency. Color, Plasticity, Soil Types, Texture, | rabric, Bedding, Moisture, PID measurments | | Maisture (dry: mo saturated) | GI4 | |
| | | 4/1 | NINE CONSID | DAND GRAVEL d LD STUNE GRAV | Art gray-black, F | met w | M-1.V | 0.0 | ╇ |
| | ····· | // | | LD SMAR GA | (\mathcal{L}) | | | | 1 |
| | -+ | / | C The T | | | | | | |
| | / | | S. IT SI. VE - 9 | MAY, Frace KNE | SAND, GRAding | to | 14 | 0.0 | ┢ |
| | | 12 0.5 | CLAY HOM | N- GROWAL CLARK | w/ trace - little | | | <i>Ų</i> , Ŭ | |
| | | 3,5 | Hin Hin | LAMINAR | 1 MACE - 11 FILL | SILTAS | | | |
| | 23 | 5/ | Ciay Lt ba | WN-JRAY, AS ADS | VR W/S.IT-SAND | LAMÍNAVE | M | 0. 0 | ┝ |
| | | / _ | ······ | | / | | | Va | |
| | -+ / / | | | | | | | | |
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| 7 | | U | | | | | 1 | | •••• |
| ╺╶┼──┼╴ | | - | | | | | | | |
| | | / | LUSTALLD | 1" dia PVC well | | | ┼───┤ | | |
| | | / | | (3 | 5) Kisco + 2.5' | -1 435 | | ····· | |
| | -+ | | | | 7') Scrus /- | 3 | | | ····· |
| | | | | | | B' kys | ┟───┤ | | |
| | | | | | | | <u></u> † | | ····., |
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| Project | : | Flex | o RI I | nvesti | gation Surface Elev.: Borehole No.: | RIB- | 2 | , |
|---------------------------------------|-------------|-----------------|----------------------------|---|---|---|-----------------|---------------|
| roject No. Client Location | : | Flex | 5-002 o Trar alo, N | isparer Y | Ref. Elev.: Date Started: 10/14/2009 Contractor: Earth Dimensions, Inc. Date Finished: 10/19/2009 nt, Inc. Driller: Drilling Method: Direct push Rig Type: Deitrich D-50 Logged By: JPH | | | |
| Sample ID | Sample Type | Blows /6 inches | Recovery / Length (ft.) | Solf Classification / Symbol (Include | Loron, Fusikity, sint Types, Texture, Fabric, Bedding, Moissure | Moisture (dry, novist, wet, sutwated) | PID Scau (ppn) | PID Headsnace |
| | | | 31 | | 1.1 Fill as Gravel ind Stand gray - black, Kine grain y trace Silt sharp can that w | | 0.0 | |
| 1 | | | | | 0.7 Silt dark gray-black, trace Rive SAND with Clay, grading | | <u> ().</u> ථ | |
| ••••• | | | 4.V | | 1.3 CINY SMY-brown of ve Mo Her, still w/ silt-sand | | 0. <i>1</i> .Q. | |
| 3 | | | 1 ⁴ ' | ······ | 3.5 CLAY brown-olive stift of little-some Rine Sant | | 2, 0 | ····· |
| | | | 3.5 | | Installus 1" pVC WEIL +25 stickup | | <u>, 9</u> | |
| | | | | | Risen 0, D-10, 695 Scored 101-8, 695 | 0 | J, | |
| ··· · · · · · · · · · · · · · · · · · | | | 4. d | | | 6 | 70 | |
| · · · · · · · · · · · · · · · · · · · | | | | | | 0, | 6 | |

| Pr | oject | . <u> </u> | Fle | (o RI I | nvestig | Borehole No.:Borehole No.: | RIB- | 3 | |
|---------------------------------------|--|-------------|-----------------|-----------------------------|---|---|--|-----------------|---------------------|
| (| t No.: Client: ation: | | Fle | 5-002 to Tran falo, N | isparer Y | Surface Elev.: Date Started: 10/ / ¹ /2009 Ref. Elev.: Date Finished: 10/ / ¹ /2009 Contractor: Earth Dimensions, Inc. Drilling Method: Direct push nt, Inc. Driller: Water Depth (bgs): Image: Deitrich D-50 Rig Type: Deitrich D-50 Logged By: JPH | | | |
| | Sample ID | Sample Type | B(ows /6 inches | Recovery / Levgth (ft.) | Soil Classification / Symbol (Include | Line and the second s | Moistare (dey, atoist, wet, suturated) | PID Scan (pour) | PID Headspace |
| ····· | ······ | ····· | | | | 0.6 Concrete | | | |
| | | | | 2 | | 0.3 Fill 6/Ack SAND, Rina ginin w/ wasp | 12 | 0.0 | 1 |
| ····· | | ********* | | | | 0.4 SAND 9MY, Fine grain, 1. HILL SITE 1.9 Clay 2+ brown - Nive, still, trace - little Sitt w/ Him Ring grain SAND particip | M | 0.0 | |
| | | | | | | terministed balancy & 4' kgs | | | |
| | ······ | | | 4.0 | | ENSTAILS 5' SCALED +1 -41 bg J | ······································ | | |
| · · · · · · · · · · · · · · · · · · · | ······································ | | | | | 11:00 Collected Soil for PCB | | | |
| 5 | ····· | | | | | | | | |
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| | ····· · · · · · · · · · · · · · · · · | •••••• | | | | | | | |
| <u> </u> | | | [| | | | ······ | ····· | • • • • • • • • • • |

| PIRNI PIRNI | c roject | : | Flex | ORII | nvestig | Borehole No.: | RIB- | . 4 | |
|-----------------------|----------------------------|-------------|-----------------|----------------------------|---|---|---|----------------|---------------|
| Proje | ct No. Client cation | : | 610 Flex | 5-002 | Isparer | Ref. Elev.: Date Started: 10// 7 /2009 Contractor: Earth Dimensions Les Date Finished: 10/ / 9 /2009 | | | |
| nepui (BUS) | Sample ID | Sample Type | Blows /6 inches | Recovery / Length (ft.) | Soil Classification / Symbol (tretude | and a function of the second | Maisture (dey, tantist, wet, taturotad) | PID Scan (ppm) | PID Headspace |
| •••••• | | | | .) | | Let Fill as SAND AND Silt gray, Fina grain of concrete | 12 | <u> </u>] | <u> </u> |
|] | | , | | 23 | | | | 0.0 | |
| 3 | | | 3 2 | ,1 | | 0.7 /:// AS AVOVE of WOD AND GRAVE | S | 0.0 | |
| | | 2- | 3 | 2,° | | | | | |
| 5 | | 3 | | 15 | | 0.2 Fill ATA 0.4 SAND dark grav, Five shipht 0 2012 0.9 Clay MeD Gray brown Still, dense w/ Frace silt | S | 0.0 | |
| | | k Z | Z | 7.0 | | 2.0 Clay reb-brown, still, dense moderate plasticity | M | 0.0 | |
| | ······ | , | | z. 0 | | Justitud // 3-9 b33 | | | |
| | | | | | | | | ····· | ••••••••••• |

| Project : Project No.: Client: Location: | Flexo RI Investi 6105-002 Flexo Transpare Buffalo, NY | Ref. Elev.: Date Started: 10// ½/2009 Contractor: Earth Direct (1) Date Finished: 10// ½/2009 | RIB - /3 | 5 | / <i>4;</i> /; |
|---|--|--|---|------------------|---------------------------|
| Depth (BGS) | Blows / 6 inches Recovery / Length (fi,) Soil Classification/ Symbo) (notude | Lithology Description and Remarks Density/Consistency. Color. Plusticity. Sail Types. Texture. Fabric. Bedding. Mulssure. PID measurments 0.0-0.5 Condeller 5/AD 6.5-0.9 Fill AS SAND, product black Alade up Nab brick 1.6 SAND LE DISTINGT JUN, ALAZ GRADD of tr-Title Sitt | Acustune Z (1671. murist, wer, santrated) | O PID Scan (ppm) | PII) Headspace (DDIII) |
| 3 5 7 | 4.0 | $\frac{21}{1.10} \frac{5.4}{9} \frac{5.4}{7} $ | M hJ S | 0.Q 6.2 | |
| 9 | 1.8 | 1.8 SAND LEgny-brown, hive Frace-1. He Fors grown) (FII) AND SITT Spon refinen (C. 9.81 555 | | <u>()</u> | |

Borehole Log Summary Form Supplemental IRM Pre-Characterization Flexo Transparent Site 1132 Seneca Street, Buffalo, NY

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in the second

| Boring # | Fill Thickness_ | Max PID | PID Depth | Depth Drilled | Depth to water | Description/Comments |
|----------------------|---|---|---|---|--|--|
| SBA1 | 1.2' | Ø | man year age | 3.6/4/10 | a. | 0-0.5 Ton - gray Sond+Grach Ill, fr. Silf 0.5-1.2 Block Cinders, Slag+Brook |
| SBA2 | 2.0 | O | - | 30/1.0 | | Fill: Gray Sound + Gravel 20 B.44" Black Gravel, Cladure + Slag to 2.0" |
| SBA3 | 1.1 | 0 | | 3.0/4.0 | | Fill: Gray bin Said & Grovel fr. rusty metal fragments to 0.7', Black Cind-s 25/30 W/more sheet metal tragments to 1.1' |
| SBA4 | 1.0 | 0 | | 3.0/4,0 | | Fill: Black (Huders Slag and Grave (|
| SBB1 | 1.8 | C | | 3.2/4.0 | | Bialin reid stay B/AC not sites |
| SBB2 | 1.3 | C | a 200 | 2. 9/4.0 | n j an an | DKGroup Greave Lat Slag, tr. C. nows |
| SBB3 | 1+2 | 0 | Management. | 115/4.0 | - | Gray-BIK Great w/ Condes, Cenert |
| SBB4 | 1.0 | C' | | 1.614.0 | | Group - Bik Concel + Cindro 3 |
| I SBC1 | 1.5 | C | | 310/470 | | F.11. Gray-Lea Brase 14 he sad tans it Enders + Stag 015-115 |
| ² SBC2 | 2,0 | O | | 3.0/4.0 | agaant #* | Fill C.C.+5 CISY +Silt, vewerked notice 015-210 Black Cindans, slas, Bin K+Grent |
| ³ SBC3 | 1.0 | C | · · · | 2.0/4.0 | | Fill: Grandel W.S.IF. DKgard-black Cinders & Slass at 015 |
| ศ SBC4 | 1,0 | 0 | | 2.0/4.0 | | Fill: Group-how Grovel + Rle Sand to Bield |
| SBD1 | 1.91 | C' | | 3.0/4.0 | | Fill-Gradia Sud a Silt or/ Clay Churchs, rewarded norther Sails (lay 0.5-0.5 Gradel/Crans + Said 1.6-11.6 DKG |
| SBD2 | 1.3 | 0 | , | 3.0/4.0 | | + Slag at C. C. to 13' |
| SBD3 | 1.5' | Ĉ | | A.C | - | FALF Gread - b/ K Great + ik Sund, 1. 1445 |
| SBD4 | €. C' | Ĉ | a/ | 2.5/4.0 | •- | Fill-Gongato- Group Inside, to Slay, to Back, word to agained at 0.5 No Low |
| | SBA1 SBA2 SBA3 SBA4 SBB1 SBB2 SBB3 SBB4 I SBC1 Z SBC1 Z SBC2 SBC2 SBC3 I SBC4 SBD1 SBD2 I SBD2 I SBD2 I | SBA1 $1.2'$ SBA2 2.0 SBA3 1.1 SBA3 1.1 SBA4 1.0 SBB1 1.5 SBB2 1.3 SBB3 1.2 SBB4 1.0 SBB3 1.2 SBB4 1.0 SBB3 1.2 SBB4 1.0 SBC1 7.5 SBC2 2.0 SBC3 1.0 SBC4 1.0 SBD1 $1.5'$ SBD2 $1.5'$ SBD3 $1.5'$ SBD3 $1.5'$ | SBA1 $1.2'$ $1.2'$ SBA2 2.0 $0'$ SBA3 1.1 $0'$ SBA3 1.1 $0'$ SBA4 $1.0'$ $0'$ SBB1 $1.5'$ $0'$ SBB2 1.3 $0'$ SBB3 1.2 $0'$ SBB3 1.2 $0'$ SBB4 $1.0'$ $0'$ SBB3 1.2 $0'$ SBB4 $1.0'$ $0'$ SBC1 $1.5'$ $0'$ SBC3 $1.0'$ $0'$ SBC4 $1.0'$ $0'$ SBD1 $1.5'$ $0'$ SBD2 1.3 $0'$ SBD3 $1.5'$ $0'$ | SBA1 $1.2'$ $1.2'$ $1.2'$ $1.2'$ SBA2 2.0 $0'$ $-$ SBA2 1.1 $0'$ $-$ SBA3 1.1 $0'$ $-$ SBA3 1.1 $0'$ $-$ SBA4 $1.0'$ $0'$ $-$ SBB1 $1.5'$ $0'$ $-$ SBB2 1.3 $0'$ $-$ SBB3 1.2 $0'$ $-$ SBB4 $1.0'$ $0'$ $-$ SBB3 $1.2'$ $0'$ $-$ SBB4 $1.0'$ $0'$ $-$ SBC1 $1.5'$ $0'$ $-$ SBC2 $2.0'$ $0'$ $-$ SBC3 $1.0'$ $0'$ $-$ SBD1 $1.5'$ $0'$ $-$ SBD2 $1.3'$ $0'$ $-$ SBD3 $1.5'$ $0'$ $ 0'$ $0'$ $0'$ $-$ | SBA1 $1.2'$ 0 $3.0/4.0'$ SBA2 2.0 0 $ 3.0/4.0'$ SBA3 1.1 0 $ 3.0/4.0'$ SBA3 1.0 0 $ 3.0/4.0'$ SBA3 1.0 0 $ 3.0/4.0'$ SBA4 $1.0'$ 0 $ 3.0/4.0'$ SBB1 $1.5'$ 0 $ 3.0/4.0'$ SBB1 $1.5'$ 0 $ 3.0/4.0'$ SBB1 $1.5'$ 0 $ 3.0/4.0'$ SBB2 1.3 0 $ 3.0/4.0'$ SBB3 $1.2'$ 0 $ 3.0/4.0'$ SBB4 $1.0'$ 0 $ 3.0/4.0'$ SBC1 $1.5'$ 0 $ 3.0/4.0'$ SBC2 $2.0'$ 0 $ 2.0'/4.0'$ SBD1 $1.5'$ 0 $ 3.0'/4.0'$ SBD2 $1.5'$ 0 $ 3.0'/4.0'$ SBD3 $1.5'$ | SBA1 $1.2'$ 0 $3.6/4/.0$ $-$ SBA2 2.0 0 $ 3.0/4.0$ $-$ SBA3 1.1 0 $ 3.0/4.0$ $-$ SBA3 1.1 0 $ 3.0/4.0$ $-$ SBA3 1.1 0 $ 3.0/4.0$ $-$ SBA4 1.0 0 $ 3.0/4.0$ $-$ SBB1 1.5 0 $ 3.0/4.0$ $-$ SBB1 1.5 0 $ 3.0/4.0$ $-$ SBB2 1.3 0 $ 1.6/4.0$ $-$ SBB3 1.2 0 $ 3.0/4.0$ $-$ SBB4 1.0 0 $ 3.0/4.0$ $-$ SBC1 $1.5'$ 0 $ 3.0/4.0$ $-$ SBC3 1.0 0 $ 3.0/4.0$ $-$ SBD1 $1.5'$ 0 $ 3.0/4.0$ $-$ SBD3 $1.5'$ <th< td=""></th<> |

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Borehole Log Summary Form Supplemental IRM Pre-Characterization Flexo Transparent Site 1132 Seneca Street, Buffalo, NY

| Sample Cell | Boring # | Fill Thickness | Max PID | PID Depth | Depth Drilled « | Depth to water | Description/Comments |
|---------------------|----------|----------------|-------------------|-----------------------|-----------------|--|---|
| 116/09 | SBE1 | [16 | 04 | | 3.0/4,0 | <u>ب</u> | Gray Grand + Sand + 0 0.3' Black Conders Gravel + Sking + -, Wood |
| λύ ` Ε | SBE2 | /· Z | 0 | | 3.3/4.0 | · · · | Black Cinders, Grovel + Slag |
| 0a10 | SBE3 | 17 | 0 | | 3.5/4.0 | | Grout-bron Sound & Grove 40 0.3' Black Croders + Slag to 1,7 |
| | SBE4 | 2.0 | 0 | | 3.5/4.0 | •••••••••••••••••••••••••••••••••••••• | Ton-Gray Gravel + Send (crosted store) +00. Black Grovel, Corders, fr-fittle Silt SI, Part |
| 1 100 1 100 F | SBF1 | 1.0 | 0 | | HET 1.31 4.0 | | Gray-Black Gradel, Condens + 5/2 Such |
| ¥ ДОО | SBF2 | 1.C | IN iN | 1'0 | 3.6 4.0 | | Guncies # |
| in the | SBF3 | 6.0 1 | Ľ | Ç ^u ncere | 2.6 4,00 | 19. 11 | Gray Cycal + Sund 1000 shed stars) to 0 5 |
| | SBF4 | , ΰ | music | a to the second state | 2.11/4.0 | and the second sec | Broy-BH CINDUS 15/05 5B STUK DH GRAY Grown, Schefte Sud, Fr S.14, Fr. 3 Ward & Digit |
| 11 mg | SBG1 | 1.0 | \mathcal{O}^{+} | | 1.5/4,0 | - ** | Bray-ton Gravel, little is Sand it. Sit Di Gry-bik Co.s. to Cindos, WHA |
| °, ^w | SBG2 | 1.0 | O | | 1.5/4.0 | | Gray-ten Brover to Sad, to. S.14 0.5-1.0 Brock, Cindus, Slas |
| | SBG3 | 1.5 | Ø | - | 2,0/4.0 | | Fluer (Sea netice) C12-115 |
| | SBG4 | 1:5 | \mathcal{C}^{i} | | 2.5/4,0 | | Fill Plany (F. ciel, I. Frk Sond, tr. Chy Thurst Cind ratice) Cit-18 Gray - plank Cind - 3, for over bouck, File Gray Grant + Filesund (Cristical Stare) Cist- DK Sry - block Graver Graver, Star |
| 12/15/69 | SBH1 | 1,5 | 0 | | 3.2/4.0 | | Fill: Georely Hk Send, 11 Silt. Cindens & Slarg of iranstain at 1.0 |
| (qut | SBH2 | 1, Ó | 0 | | 3.0/4.0 | | - Aulli Respective Company is South at Company |
| | SBH3 | 7.3' | C | · | 415/6.0 | | DKg. 4-black Ground Conductor Sing Fill. Bin Grow Sund, RZ tie from 1-1.5 |
| : | SBH4 | 0.51 | O, | | 3,2/4.0 | | Fill: Bin Frax 1 + Sind to 0.3', Organics (march) and Silty France 0.3'-0.51 |

Borehole Log Summary Form Supplemental IRM Pre-Characterization Flexo Transparent Site 1132 Seneca Street, Buffalo, NY

Castron anno 2

Lange areas

| Sample Cell | Boring # | Fill Thickness | Max PID | PID Depth | Depth Drilled | Depth to water | Description/Comments |
|--|----------|----------------|---------|--------------|---------------|-----------------|---|
| 12/16/09 | SBI1 | 2,3 | 0 | | 3,5/4,0 | yfrær yn | Gray ton Grace + Sand to 0.4' Black . & & Gravel, Silty From 1-1.5 |
| 0950 | SBI2 | 2,0 | o . | - | 3.5/1.0 | ~1.8 | Block Cindre, Brekl, to Bilek |
| | SB13 | 2.5 | 0 | | 2,5/4,0 | -1.6' | Tan-Grovel + Smithtle SAH. 0.6' Block Grovel + Smith, 8/ag |
| | SB14 | <u>i</u> 6 | O | _ | 2.7/10 | ~ 1.0' | DK group Grove (+ Sand #/Slang + Conders |
| 12:17 109 | SBJ1 | , 3 | C | | 2.5 14.0 | | Gray crished Steve, little Silt Cist-112 in rug- plack Grant + Cirbos |
| 1255 | SBJ2 | L.C | Ć | , | 2.5/4.6 | at | ph-Gray grant and rac Sund/Cirdes, tr. Silt, Weed (RR-TIE!) at 1.5" |
| | SBJ3 | | 24 | 1,4 | 2.5 4.6 | | De Gray (row), Fle Sind + Silt, 7 Grannis, C. 7 (indus + Silt) (some other) Munificanis layer at Juy? |
| | SBJ4 | 2.7 | () | - | みんしりし | | Gray Grand our Black Cinders Flourd to Cot Conders to 110 |
| 0900 12/15/66 | SBK1 | 2,0 | 0 | | 2.8/4.0 | | F.11: Grovel + Sond, bin-Alk, Cindos + Slag, |
| [τ]/ · · · · · · · · · · · · · · · · · · · | SBK2 | C. 3' | O | Same States, | 3.5/4.0 | ų | Fill: Growly Sund, fr. Brick |
| | SBK3 | 1.5 | 0 | | 36/4.0 | | Fill; Gravel + Sand, Dim-DIK |
| m21. | SBK4 | 0.21 | Ũ | مىسىر. يە | 3.0/4.0 | | Cindros + Sind No lever Son plan |
| 0820 DUP.U | SBL1 | 2.0' | Ċ | Ŀ | 3.5/4.0 | - Z HAP | Olic; Cinder, Bin - BIK. Frinsteine |
| | SBL2 | 0.3' | C) | | 3.5/4.0 | ۰. ۲. ۲. | ancrete 6"- Fill ~ 4" Sond + Gravel Bon-Block |
| L, Ku 12/17 | SBL3 | 1.0' | Ċ | | 344,0 | | Rec. 3' Fill s bron Sind + Gravel "denner" Mun Mer singles Graph/K@ Dist |
| 1 | SBL4 | C precedent | 0 | _ | 35/4.0 | | Colorel. No is en plan |

Borehole Log Summary Form Supplemental IRM Pre-Characterization Flexo Transparent Site 1132 Seneca Street, Buffalo, NY

Construction of

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Constant of the

| Sample Cell | Boring # | Fill Thickness | Max PID | PID Depth | Depth Drilled | Depth to water | Description/Comments |
|--|----------------|----------------|-------------------|-------------------|----------------|----------------|---|
| ISCT MU | SBM1 | 1.5 | 0 | | 4.0 | | Converte + 2" Fill to 117 bg= Gray- Garalt Fle Sand |
| 1510 ML 1510 ML 12/1-109 12/1-109 | SBM2 | 0.2 | C | - | 4.0 | | Consistent Fill for Cifings +00151 Fill for Cifings |
| | SBM3 | 2.0 | C | | 4,0 | | Fill to 2'be: |
| | SBM4 | 8:3' | O | در مان الروويونيم | 4.0 | | Grevel, concrete Sound Concrete to 0.5' Fill to 0.5'to 5 Fill- Gray-black Gravel + Fle Sound Nglues |
| 14,500 1420 NL | SBN1 | 1.5 | \mathcal{O} | - | 4.0 | - | Fill to 1.5 - Forene & Ale Sand |
| 12/14/00 12/14/00 | SBN2 | 0 13 1,19 | 20 | c 1946 | 4.0 | , | Generate Oist her 0.3' of I.II Gravely Sond - No love Sun D |
| | ĭ \$BN3 | | 231 | | 410 | | Grevel+ Sond - No cover Sup Fill to 1.5' Grovel + Sond Wood Cost-1.2' [RZT? |
| | SBN4 | 0.4' | 0 | | 4.0. | | Grevel + Soud Wood Cost-1.2' (RRTIP) Fill to 0.4' Grevel + Soud Fill - No loves Soup Concrete 6" Fill & to is bys |
| 1255 CU 1300 UL | SBO1 | 1: Opeland | de • O | | 4.0 | | concrete 6" Fill & to ist bys |
| 12/14/09 | SBO2 | Ortoclaren | . ⁰ .3 | O.F | 4.0' | | Zistant 1'concrete, General fill to 1.2'4; |
| | SBO3 | 1. Opelaur | 203 | 0.51 | 4,0 | · Ø | Gravel Fill, A/c Send |
| | SBO4 | 1 Steen | 23.0 | hle. | 4.0 | | Concrete to SI Fill to 2.5' Concrete to y' Refurst Zind Hole Bioke thorain ton K 2.8' Roc. DK Sig Ground 1 + CS Sind |
| 1040 PJ | SBP1 | 2' | 3.2 | 0151 | 4' | | 4 |
| 12/14/00 | SBP2 | 4.333 | · 0 | | 4.5 | s | 256" anesete austration @ 21 DK Bry Grand |
| | SBP3 | 7.61 | 0.6 | 213 | 6' | | No VIPU, 2' concluded store Black Soft Gravel & Wend |
| | SBP4 | 1.2' | 0 | g stagetier a www | 4 ^r | | Bla Grave 1, 6/K, Fle Sand Apphalt on top |

Table ??-?? Borehole Summary Supplemental IRM Pre-Characterization Flexo Transparent Site 1132 Seneca Street, Buffalo, NY

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| Sampie Cell | Boring # | Date Drilled | Fill Thickness ¹ (ft.) | Average Fill Thickness (ft.) | Max PID | PID Depth | 1 | Approx. Depth to Water | |
|-------------|-------------------|-----------------|---|------------------------------------|------------------|-----------|------------|------------------------------|--|
| <u></u> | SB-114601-1 | | | (11) | (ppm) <i></i> | (ft. BGS) | (ft. BGS) | (ft. BGS) | Fill Description/Comments |
| 1146 D1 | | | | | ٥ | | | ······· | 1-2-2-6 sitty and Bow |
| | 5B-114601-2 | -3-18 | 1.4- | | 0 | i | 24/4.0 | | 0-1.4 Fill Black Red Briet whitewe |
| | CD 1146 411 4 | 7 (0) | 14 | , <u>;</u> | 0 | | 27/ | | |
| | SB-1146 H1-1 | 718 | 1.7 | • • | 0 | | 2.7/45 | <u> </u> | 0-1.4 Fill BIKet abriet Red GMY el, SIAg- wet |
| 1146 H1 — | SB-1146 H1-2 | 3-18 | 20 | | 0 | | 2.3/ | | 1-4-2-7 clA4-sitty, Mid BAN 0-0-6 Fill BIALE SIZT 79 PAVEL |
| | | | | - | 0 | ~~~~ | <u> 75</u> | | 0.6-1.5 Fill BLACE+Brick BEN SCHATTER |
| 4 3 m | SB-1146 K1-1 | 3-18 | 1.7 | | Ø | 6 | 3-1/4.0 | | Fill O TO 1.7 BACK/Brick-Beaf Slagt graver wet |
| 146 K1 — | ****** | · | | · | 0 | | 26/ | | 1.7-31= clay. sitty und to 6144 6-0-5 EAU Black great wet |
| 925 - | SB-1146 K1-2 | 318 | 16 | - | 0 6 | - | 4.0 | 1010 | 0-5-1.6 Fill Black + Brick Rola aver |
| As | SB-14 6 -1 | 3-18 | 1.41 | | 0 D | | 2.5/ | · | 1.6-2.6 silty cluby md BIN. Moist 0-19 Eill BINCK, gravel, slilly c+P. wet |
| 146 L1 | 9191. | | | | 0 | : | <u> </u> | | 1.4-2.5 silty clay gilly to und Bre |
| | SB-14 | n/8' | 1. > | - | 0 | | 2-2/10 | | 0-1.3 FILL BIACK PRICE Del SIAG |
| | | : | | 1 | \mathcal{D} | | | | 1.3-2.2 c/A/ silty, Med BIN, mist |

Table ??-?? Borehole Summary Supplemental IRM Pre-Characterization Flexo Transparent Site 1132 Seneca Street, Buffalo, NY

| Sample Cell | Boring # | Date Drilled | Fill Thickness ¹ (ft.) | Average Fill Thickness (ft.) | | PID Depth (ft. BGS) | Depth Drilled (ft. BGS) | Approx. Depth to Water (ft. BGS) | Fill Description/Comments |
|-------------|--------------|-----------------|---|------------------------------------|---|---------------------------------------|-------------------------------|---|---|
| 900. | SB-1146 O1-1 | 3-19 | 0.7 | | 0 | | 35/40 | | 0-0.7 Fill Gravel, SAND CRUSKelston Black |
| 1146 01 | SB-1146 O1-2 | >-/P | 0.6 | | 0 | · · · · · · · · · · · · · · · · · · · | 3.0/ /4.8 | i | 0-0.6 TOPSOLY IT. BINCH, WE T. PTALLE(SMARKE, 2T, BREAK. 0.6-1.1 CIAY, DIKENKY SISTER |
| | SB-1146 P1-1 | 318 | 1.1 | | 0 | | 3.2/ / E. 8 | | 1-1-30 Sitter Medbern. 0-0-200 Serie crushed star wat 0.2-0.49 Aver crushed star wat 04-1.1 Fill Black grave Brisk store 1-1-3-2 Sitter 1990 1990 - The |
| 1146 P1 — | SB-1146 P1-2 | - · ,6' - 3 | 0 .7 | | 0 | - 3/ | 4.0 | | 0-0.7 Fill Black graversig |
| 1105 | SB-Q-1 | 3-18 | 0.2- | | 6 | | 3.5/ 4.8 | c-nca+ | 0.7 To 3.2 slittech med beni 0-0.2 Fill, gracel. SIAS BIAK. TRACE BITCH, Rep |
| a | SB-Q-2 | 2-18 | · · · · | · | 8 | | | | 0.2-3.5 sifty inter MBGrAyw/ FAN MotTING SITTY MARST concrete 0.6 THERE D-0.1 Fill Grevel Black wet |
| 107- | | -310 | | - - - - | 6 | | 5.9/ 14.0 | | 0.1-3.9 CHR MABIN MOIST |

ND 10 MM

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Table ??-?? Borehole Summary Supplemental IRM Pre-Characterization Flexo Transparent Site 1132 Seneca Street, Buffalo, NY

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| Sample Cell | | Date Drilled | (ft.) | Average Fill Thickness (ft.) | Max PID (ppm) | PID Depth (ft. BGS) | Depth Drilled (ft. BGS) | Approx. Depth to Water (ft. BGS) | Fill Description/Comments |
|-------------|--------------------------|-----------------|-------|------------------------------------|------------------|--|--|--|---|
| | \$B-U-1 | 3-18 | 1.8 | = : | 0 | - | 140 | | 0-18 Fill grave also Black the |
| | 1147HRS | | : | | 6 | [| | - | 1.8-2.5 claysilty Bland |
| | SB-U-2 | 318 | 1.8 | | D | | 27/ | · · · · · · · · · · · · · · · · · · · | 0-1.8 Fill gravel state 50 Brick Black Lief |
| U | 1130 1125 | | | | 0 | al- Blackt | | dimension of the second se | Brick Black, wet 1-8-2? Silty c (My Mess BRI 6-1-6 Fill grave Black wet |
| | SB-U-3 | 3-18 | 1-6 | | | 6 | 2.8/ | | |
| | 1146483 | | | | | | /~~~ | | 1.6-2.7 CINEY SILTEF-BIELON MEGGT 0-1-5 F-11 grave 1, CRSSHSTONE, CD |
| 12 | SB-U-4 3 1125 H123 | 18 | 1.5 | | 4 | | 2.4/4.0 | | pract wat |
| 39 | 1125 HRS | 3-4 | | : : : | 8 | 0.1' BIRct | 147 | | 1-5-24 elley Silty then Hois' Black Stand Fix offer 0.4 His BINS |
| | | | | | | | | | |
| | | : | | - - - | | | | | |
| - | | | | | | - 1414 - 1414 | | - | |
| | | | | · · · | | An A A A A A A A A A A A A A A A A A A | | | |
| | | : | | | | | | | |
| | | | | | | | ······································ | | |
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Table ??-?? Borehoie Summary Supplemental IRM Pre-Characterization Fiexo Transparent Site 1132 Seneca Street, Buffalo, NY

| Sample Cell | Boring # | Date Drilled | Fill Thickness ¹ (ft.) | Average Fill Thickness (ft.) | Max PID (ppm) | PID Depth (ft. BGS) | Depth Drilled (ft. BGS) | Approx. Depth to Water (ft. BGS) | Fill Description/Comments |
|-------------|----------|-----------------|---|------------------------------------|------------------|------------------------|-------------------------------|---|---------------------------|
| | | , | | _ | | : | | | |
| | | • | | _ | | | | | |
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| | | . . | , | | | | | | |
| | | | 979 | ŀ | | 1 1774 | | | |
| | | <u></u> | | | | - | | | |

BGS - Below Ground Surface

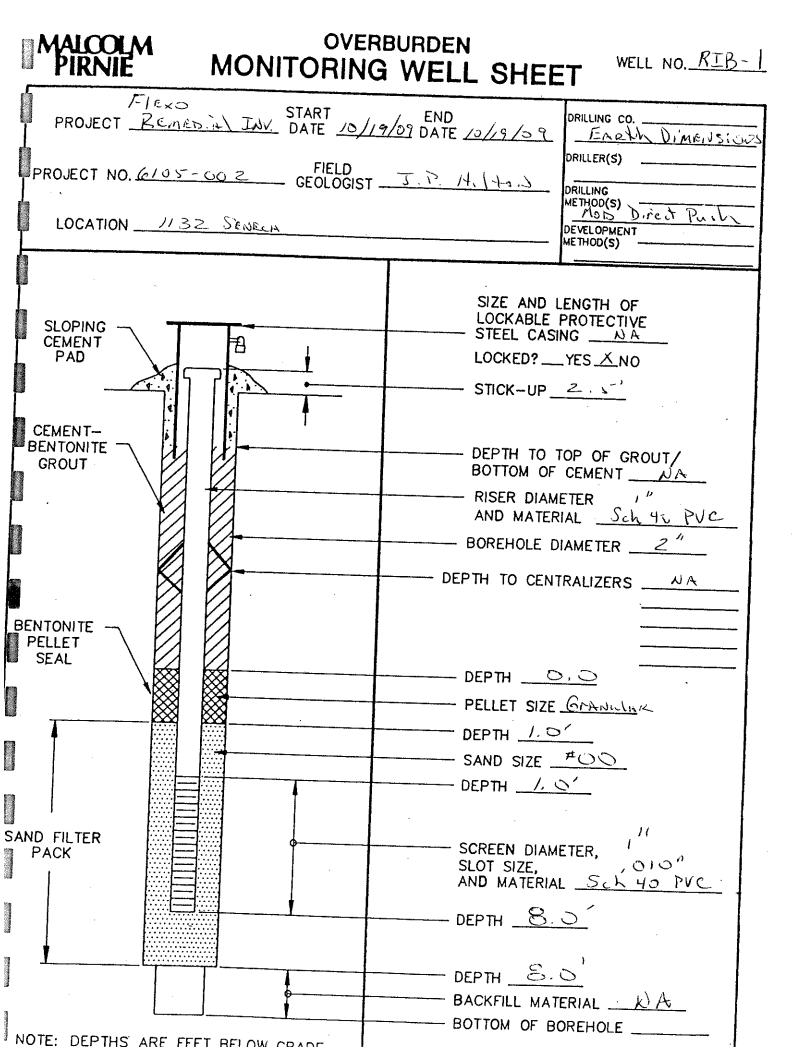
NA - Not Applicable

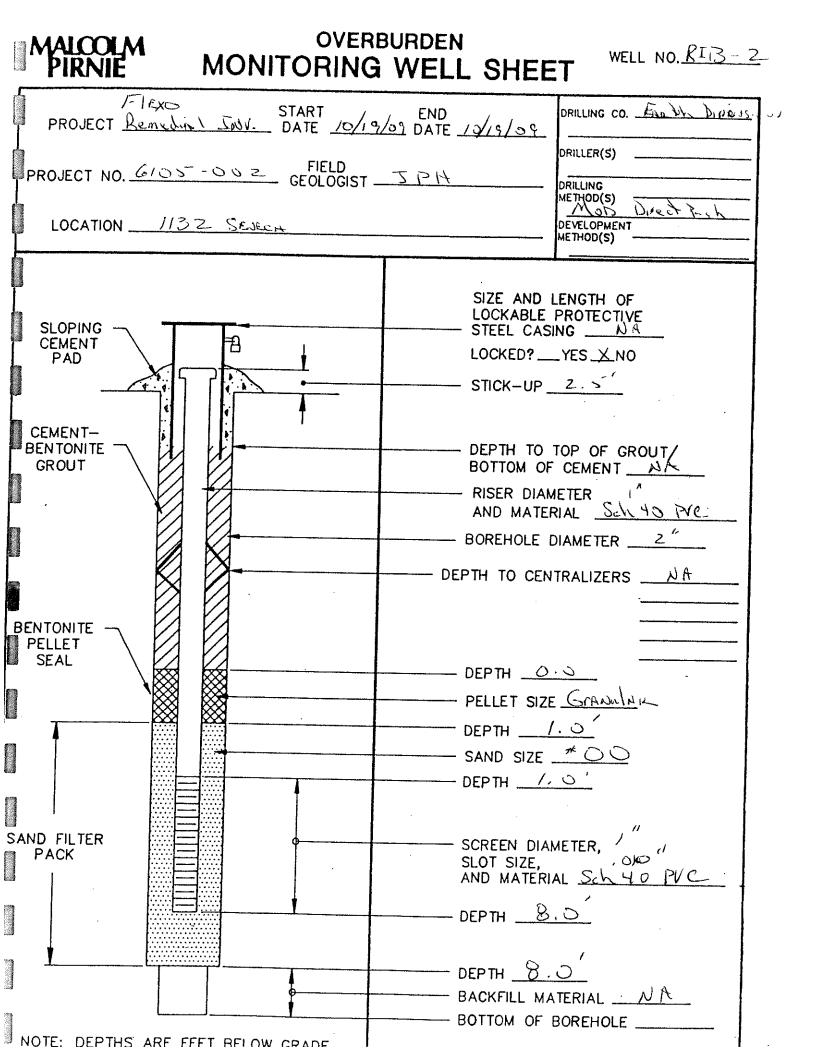
٠

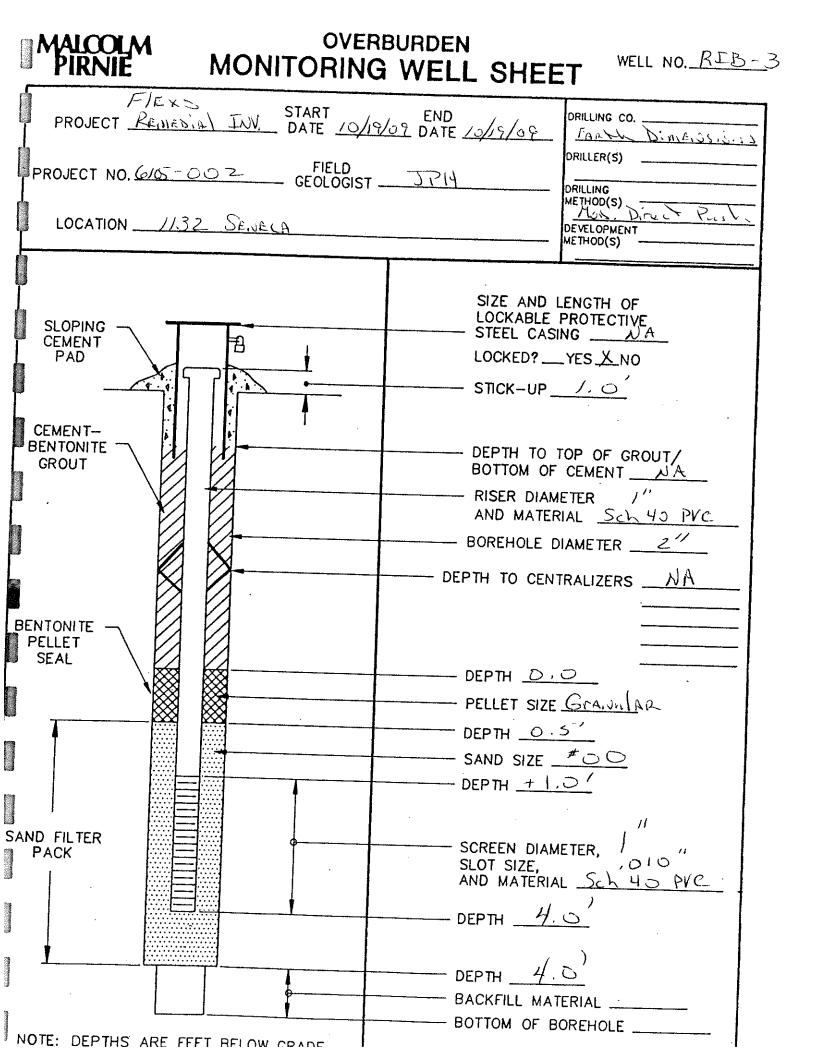
.

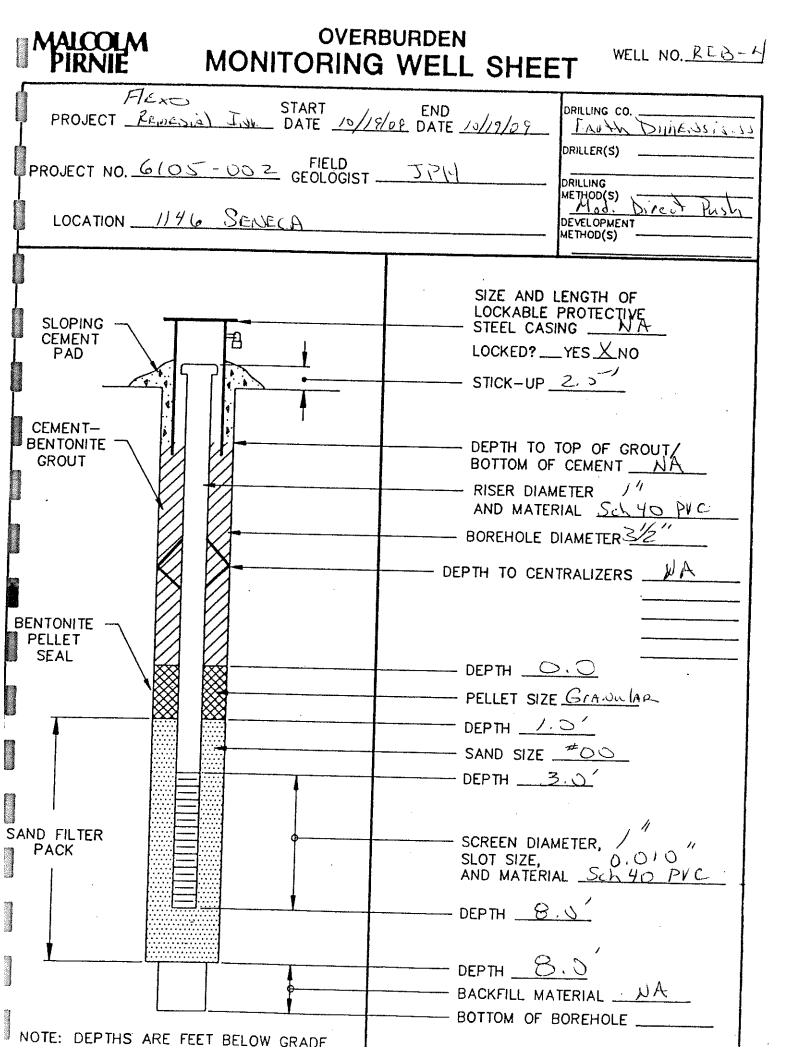
¹ Fill thickness includes asphalt or concrete at surface. Locations indicated with * after Boring ID.

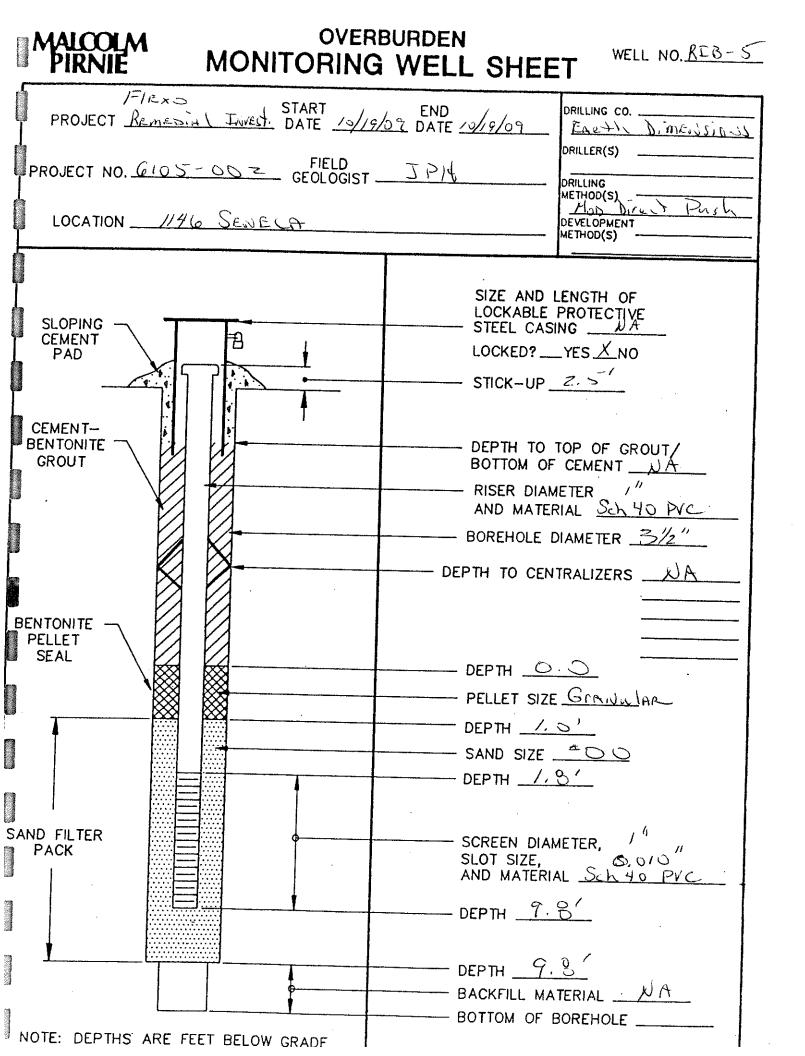
* - Fill thickness includes asphalt or concrete at surface.













Flexo Transparent, Inc. REMEDIAL INVESTIGATION REPORT

Appendix E

Well Development Records



6105002 / BUF

| | WELL DEVELOPMENT / PURGING | LOG | |
|--|--|---|---|
| | | λ | |
| PROJECT TITLE: | : FLEXO REMEDIN TAVES | Lipation | <u>)</u> |
| PROJECT NO. : | 6105-002 | • | |
| STAFF: | JPH/Dwight Symous 10/21/09 | | |
| DATE: | 13/21/09 | | |
| (2) CASING INTER(3) WATER LEVEL | IG AND SCREEN LENGTH (ft.): 70.3 ·S RNAL DIAMETER (in.): 1^{4} L BELOW TOP OF CASING (ft.): 3.2 VATER IN CASING (gal.): $.39$ | WELL I.D. 1" 2" 3" 4" 5" 6" 8" | GAL/DAY 0.04 0.17 0.38 0.66 1.04 1.50 2.60 |
| | $V = 0.0408 [(2)^2 x \{(1) - (3)\}] =GAL.$ | | |
| | | | |
| | ACCUMULATED VOLUME PURGED | (GALLONS) | |
| PARAMETERS | 13.05 13.15 13:40 13:55 14:05 10/22 | (GALLONS) | |

all a strange

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CONDUCTIVITY MS/CM 1,38 1.41 1.38 1.40 1.38 1.40 TEMPERATURE 12.9 13.3 13.0 12.8 13,5 13. DZ 63 85 51 TURBIDITY 215 64.1 13,8 Slack Slistly Twild Trik 0 3.11 4.15 clausy clouisif clear Cloning APPEARANCE 7.93 3,33 3.29 4.32 3.11 D.0 -90 -68 - 83 -87 -98 ORP -96

COMMENTS: 0900-0920 Purges Approx 1.2 put to remove sediment from well -USETS peristallic pumps for development COMMENTS:

| | | | | | 99999999999999999999999999999999999999 | | | | |
|---|---------------------|------------------------|-------------|--------------|--|-------|---|---|---|
| | | WELI | L DEV | ELOP | MENT / | PUR | GING LOG | | |
| PROJECT TITLE PROJECT NO. : STAFF: | | FIES GIO JPI | 5 A / | <u>002</u> | ist Io Lt S, | | V | | |
| DATE: | | _/ > | 121 | 107 | | | | | |
| WELL NO.: <u>R</u> (1) TOTAL CASIN (2) CASING INTER (3) WATER LEVE | G AND S | SCREEN LAMETE | R (in.): | | <u>9.1</u> <u>1''</u> <u>z.8</u> | | WELL I.D. 1" 2" 3" 4" 5" | VOL. GAL/DAY 0.04 0.17 0.38 0.66 1.04 | |
| (4) VOLUME OF V | VATER | IN CASII | NG (gal.) | : | ,25 | - | 6" 8" | 1.50 | |
| | V = 0.04 | 108 [(2) ² | x { (1) - : | (3) | G | AL. | | | |
| Time | | | ACC | CUMULA | TED VOL | UME P | URGED (GALLONS) |) | ٦ |
| PARAMETERS Gallois | 4.0 | #1:35 5.0 | | 14:50 7,0 | 15:00 9.0 | | Final SAMPE PARAME | | |

AL AN A

ay see

13.1.A.L.

No. Carto Carto

| | | | | | | EUMETEROLD (GREECHD) |
|-----------------------|---------------|----------------|---------------|------------------|-----------------|--------------------------|
| CALLONS | 4.0 | #1:30 5.0 | 14:40 6.0 | 14:50 7,0 | 15:00 8.0 | Final SAMPE PARMETERS |
| рН | 6.86 | 6.84 | 6.85 | 6.88 | 6.8 | 6.9 |
| CONDUCTIVITY MS/cm | 1.43 | 1.43 | 1.39 | 1.43 | 1,35 | 1.40 |
| TEMPERATURE | 13.6 | 13.5 | 13.6 | 13.5 | 13.5 | 13.5 |
| TURBIDITY | | 71000 | >,000 | 00015 | 3579 | 7.7 |
| | BIACK 4.47 | Turbia 4.21 | BIACK 3.57 | Gray-blK Z.B9 | 9174416 2.29 | Clear 7.82 |
| ORP | -55 | -51 | -53 | -52 | -54 | -52 |

COMMENTS: 10:00 - 10:30 Purges initial Zgal volume to number sediment from Well casing 13:5 completes purging ops CREB-2

| | |) v | |
|---|--|------------|-----------------|
| PROJECT TITLE: | FLEXS REMEDIAL INVES 6105-002 | Ligation | |
| PROJECT NO. : STAFF: | | ~ | |
| | 10/21/09 | | |
| | | | |
| VELL NO .: _RTB | <u>>-3</u> | | |
| (1) TOTAL CASING A | ND SCREEN LENGTH (fl.): | WELL I.D. | VOL. GAL/DAY |
| (2) CASING INTERNA | AL DIAMETER (in.): | 1'' 2'' | 0.04 0.17 |
| | ELOW TOP OF CASING (ft.): $D \not\approx y$ | 3" | 0.38 |
| | | 4" 5" | 0.66 1.04 |
| 4) VOLUME OF WAT | FER IN CASING (gal.): | 6'' | 1.50 |
| | = 0.0408 [(2) ² x { (1) - (3) }] = GAL. | | 2.60 |
| | | 8'' | 2.60 |
| v - | = 0.0408 [(2) ² x { (1) - (3) }] = GAL. | 8'' | 2.60 |
| V - PARAMETERS | = 0.0408 [(2) ² x { (1) - (3) }] = GAL. | 8'' | 2.60 |
| PARAMETERS | = 0.0408 [(2) ² x { (1) - (3) }] = GAL. | 8'' | 2.60 |
| PARAMETERS pH CONDUCTIVITY | = 0.0408 [(2) ² x { (1) - (3) }] = GAL. | 8'' | 2.60 |
| PARAMETERS pH CONDUCTIVITY TEMPERATURE | = 0.0408 [(2) ² x { (1) - (3) }] = GAL. | 8'' | 2.60 |

| | | | | | | · · · | | | | |
|---|--|---|---|---|---|---|--------------|--|----------|--|
| | | | WELI | L DEVEL | OPMENT | / PUR | GING | LOG | | |
| | PROJECT TITLE: PROJECT NO. : STAFF: DATE: | | - EX 610 J.F | | newial Oz Dwight | | est.j | | <u> </u> | |
| | well no.: \underline{RL} (1) total casin | B- | | | .): //.0 | (0) | | WELL I.D. | | VOL. SAL/DAY |
| (| (1) TOTAL CASING (2) CASING INTER (3) WATER LEVER (3) VOLUME OF V | RNAL DI L BELOV | AMETE W TOP C | R (in.): DF CASING (| <u> ''</u> \/ y'z ! | /11/3 (n l | 25,1 | 1" 2" 3" 4" 5" 6" 8" | | 0.04 0.17 0.38 0.66 1.04 1.50 2.60 |
| | | V = 0.04 | 08 [(2) ² | x { (1) - (3) } |] = | GAL. | | | | |
| | | | | | | | | | | |
| | Time PARAMETERS Volume progeo | 14.00 | | 14:30 | ULATED VO | 4- ,5 ,4 | | 1 | NS) | |
| | | 14.00 1.v. ta | | 14:30 Zgnl | HI4 FINA | 4- ,5 ,4 | PURGED | 1 | 4S) | |
| | PARAMETERS Vitame profess pH | 141.00 1.1.1.10 9,35 | 1:0 | 7,5 | н14 Fina (7.7 | +.5 jul | | 1 | NS) | |
| | PARAMETERS Volume profes | 141.00 1.1.1.10 9,35 | 111 7.9 2.0 ³ | 7,5 | H14 FINA 1 7.7 1.31 | 7. Le | | 1 | NS) | |
| | PARAMETERS | 14.00 1.1.1.1.1 9,35 1.42 15.3 59 | 1 5 N 7.9 2.03 14.3 4.21 | 14:30 Zgal 7.5 1.84 12.74 162 | H14 FINAL 7.7 1.31 13.7 102 | +.5 pm mple 7. Le 1.3 % jz. 3 210 | PARAMAR - | 1 | NS) | |
| | PARAMETERS blance profess pH CONDUCTIVITY MS/con TEMPERATURE TURBIDITY APPEARANCE | 14.00 1.1. KA 9,35 1.42 15.3 | 1:2 7.9 2.03 14.3 4.21 4.21 | 14:30 Zgal 7.5 1.84 1.84 12.74 162 500000 T.NT | HIY FINA 1 7.7 1.31 13.7 102 102 5.9 | +.5 pm 1.3 % 1.3 % 12.3 210 1.20 1.2.3 210 1.20 1.20 1.20 1.20 | PARAMAR - | 1 | NS) | |
| | PARAMETERS | 14.00 1.4.10 9.35 1.42 15.3 59 6.01 1.42 15.3 59 | 1 5 N 7.9 2.03 14.3 4.21 4.21 4.21 5.14 5.14 7.5 | 14:30 2911 7.5 1.84 12.74 12.74 162 500000 T.NT +108 | H14 FINA 1 7.7 1.31 13.7 102 102 5.9 7163 | +.5 pm 7. Le 1.3 % 12.3 210 1.20 12.3 210 1.3% 12.3 210 1.3% 1.3% | PANArra | tees | NS) | |

| PROJECT TITLE | | <u> </u> | 0 | _ | | |
|--|--|---|--|--|-----------------|-----------------|
| | | | | Emedial Jave | estigation | |
| | | | 5-00 | | | |
| | | | | Slit Symowl | | |
| DATE: | | | 21/09 | · · · · · · · · · · · · · · · · · · · | | |
| ELL NO.: <u>RT</u> | 2 _ | 5 | | | | |
| | | | | 11 71 | | VOL. |
| 1) TOTAL CASIN 2) CASING INTEI | IG AND S | SCREEN | LENGTH (f | L): <u>//./</u> @ | WELL I.D. | GAL/DAY 0.04 |
| 2) CASING INTE | RNAL DI | LAMETE | CR (in.): | <u> </u> | 2" | 0.17 |
| 3) WATER LEVE | L BELO | W ТОР (| OF CASING (| (ft.): (0.12 | 3" 4" | 0.38 0.66 |
| | | | · | | 5" | 1.04 |
| 4) VOLUME OF V | VATERI | IN CASI | NG (gal.): | ,23 | 6'' 8'' | 1.50 2.60 |
| | | | | | | |
| | [| | ACCUM |] =GAL. | PURGED (GALLONS |) |
| PARAMETERS | [| | ACCUM | IULATED VOLUME | PURGED (GALLONS | |
| PARAMETERS | 2 5N1 12:30 | 2,5 jz:45 | | IULATED VOLUME | | |
| | 2 7 N 1 12:30 6.64 | 2,5 jz:45 | ACCUM 15:30 3.5 6.92 | IULATED VOLUME | | |
| рН | 2 3 N 1 12:30 6.64 .979 | 2,5 12:45 7,04 .968 | ACCUM 15:30 3.5 6.92 .912 | IULATED VOLUME Final Sample 7.49 | | |
| pH CONDUCTIVITY ms/cm | 2 3 N 1 12:30 6.64 .979 15.4 | 2,5 jz:4 7,04 .968 14.35 278 | ACCUM 3.5 6.92 .912 14.65 2.74 | 1.49 .887 | | |
| pH CONDUCTIVITY <i>y</i> NS/C/11 TEMPERATURE TURBIDITY APPEARANCE | 2 5 N 1 12:30 6.64 .979 15.4 | 2,5 jz:45 7,04 .968 14.35 | ACCUM 15:30 3.5 6,92 .912 14.65 274 s.174 | 10LATED VOLUME 5.200 ple 7.49 .887 15.08 | | |



Flexo Transparent, Inc. REMEDIAL INVESTIGATION REPORT

Appendix F

Data Usability Summary Reports/Laboratory Data



6105002 / BUF

February 16, 2010

Malcolm Pirnie, Inc. Att: Mr. James Richert 50 Fountain Plaza, Suite 600 Buffalo, New York 14202

Re: Flexo Remediation Investigation Site Data Deliverables; Laboratory No. RSJ0961

Malcolm Pirnie Project / Task Order No. : 6105-002

Dear Mr. Richert,

Enclosed with this cover letter are the results of our data review of the laboratory deliverables pertaining to the referenced site. The review was conducted according to the guidelines established by NYSDEC's Data Usability Summary Review ('DUSR') process; data flags (qualifiers) were assigned to samples based on guidance contained in EPA Region II's Inorganic and Organic data validation guidelines.

Site Name: Flexo Transparent R.I.; 1132 & 1146 Seneca Street Site, Buffalo, NY

Fractions: Volatile Organics Semi-volatile Organics Polychlorinated Biphenyls (PCBs) TAL Metals + Cyanide

Laboratory: TestAmerica Matrix: Non-Aqueous

Reviewer: Chris Taylor

Prepared By: Environmental Quality Associates, Inc.

SECTION A Sample Information

The above-referenced analytical job numbers / samples were analyzed by TestAmerica Buffalo, Amherst, New York. Samples were analyzed for volatile organics (VOC, 11), semivolatile organics (SVOC, 16), polychlorinated biphenyls (PCB, 16), TAL metals and cyanide (TAL/CN, 16), in addition to matrix spikes and duplicates for each analytical fraction.

Samples were collected on 10/14 and 10/15/2009, and were received at the laboratory (VTSR) on 10/15 and 10/16/2009 in good condition, at 3.2 and 4.8 degrees Centigrade, with ice noted as present.

<u>SECTION B</u> General Comments

Summary of data completeness and overall quality of data deliverables package

Data deliverables were complete as received.

February 16, 2010

Overall data quality

Data quality was acceptable, incorporating applied data qualifiers as detailed in the accompanying QC and calibration summary forms, and discussed in the fraction-specific sections below.

SECTION C Volatile Organic Fraction

Four method blanks were processed for VOC samples. 9J23031-BLK1 and 9J23102-BLK1 presented low – level positives for methylene chloride resulting in the adjustment of methlene chloride results in sample RITP-8 (0.5-1.2) to 6.4 U ug/Kg and in sample RITP-18 (0.5-1.0) to 11 U ug/Kg.

Sample RITP-18 (0.5-1.0) was provided as a matrix spike and duplicate sample (MS/MSD). Recoveries of target compounds benzene, chlorobenzene, toluene and trichloroethene were below lower acceptance limits in both MS and MSD samples; reported results for these compounds were flagged as estimated 'UJ' or 'J', with low bias indicated, in the parent sample.

Samples RITP-5 (3.5-4.5) and RITP-DUPL#1 were identified as collocated field duplicate samples. Precision values between samples exceeded 50%RPD for 2-butanone, acetone and methylene chloride; results for these target compounds were flagged 'J' as estimated values in both collocated samples, with indeterminate bias direction.

Continuing calibrations (4) each presented several compounds which presented %D values outside the (+/-) 20% acceptance range; these are detailed on the attached calibration summary. Compounds which required qualification due to these excursions were flagged on the associated EDD file with the appropriate annotation and bias direction.

Note to data user: in cases where %Ds were >+20.0%, with CCAL RRF values > corresponding ICAL average values (i.e., greater sensitivity), no QA action was taken if there were no positives found for these compounds in the associated field samples.

<u>SECTION D</u>

Semi-volatile Organics

All samples were analyzed and reported at extract dilutions ranging from 5x to 50x, resulting in corresponding increases in analyte RL values.

Spike recoveries for RITP-9 (0-2) MS/MSD presented recovery limit exceedances in 33 target compounds, with 16 of these exhibiting differences in recovery bias directions between the MS and MSD runs. This swing in recovery direction is unexplained; these are detailed on the attached calibration summary.

Spike recoveries for RITP-18 (0.5-1.0) MS/MSD presented recovery limit exceedances in 3 target compounds; these are detailed on the attached calibration summary.

Compounds which required qualification due to these excursions were flagged on the associated EDD file with the appropriate annotation and bias direction.

Recoveries of several target compounds were outside limits in LCS (Blank Spike) samples 9J16094-BS1, 9J16099-BS1, and 9J17040-BS1; these are detailed on the attached QC summary.

Compounds which required qualification due to these excursions were flagged on the associated EDD file with the appropriate annotation and bias direction.

Continuing calibrations of 10/19 and 10/20/09 presented several compounds which presented %D values outside the (+/-) 20% acceptance range; these are detailed on the attached calibration summary. Compounds which required qualification due to these excursions were flagged on the associated EDD file with the appropriate annotation and bias direction.

Note to data user: in cases where %Ds were >+20.0%, with CCAL RRF values > corresponding ICAL average values (i.e., greater sensitivity), no QA action was taken if there were no positives found for these compounds in the associated field samples.

Samples RITP-5 (3.5-4.5) and RITP-DUPL#1 were identified as collocated field duplicate samples. Both samples were analyzed at 5x extract dilutions; no positives were reported for target compounds at elevated RLs in either sample.

<u>SECTION E</u> Polychlorinated Biphenyls (PCBs)

Several samples presented inter-column precision results above 25%D for Aroclors 1254 and/or 1260. These results were flagged as quantitatively estimated 'J'. Results which exceeded 100%D inter-column, and exhibited acceptable pattern-match for Aroclor confirmation were flagged as 'NJ', to indicate presumptive presence at estimated quantitation value. These samples and Aroclors are detailed on the attached QC summary form.

Samples RITP-5 (3.5-4.5) and RITP-DUPL#1 were identified as collocated field duplicate samples. Reported positive results for Aroclor 1254 and 1260 exhibited RPD values between samples above 50% (at 70% and 67%, respectively), and were flagged as estimated values, 'J', in both collocated samples, with indeterminate bias direction.

Continuing calibration (CCV) response %D results exceeded -15% for Aroclor 1260 in all CCV performed on 10/19/09, affecting all samples collected on 10/15/09. CCV response %D results exceeded -15% for Aroclors 1016 and 1260 in all CCV performed on 10/20/09, affecting all samples collected on 10/14/09. Results for the noted Aroclors in affected samples were flagged 'UJ' or 'J', as estimated RL values or positive results, with negative bias indicated due to reduced calibration sensitivity in the calibration verifications.

<u>SECTION G</u> <u>Metals / Wet Chemistry</u>

Recoveries of antimony and magnesium in the matrix spike of sample RITP-9 (0-2) were below the lower control limits of 75%. Reported results for these elements were flagged as estimated, 'UJ' or 'J', with low bias indicated due to matrix effects.

February 16, 2010

Recoveries of mercury, antimony, magnesium, aluminum, calcium and potassium in the matrix spikes of sample RITP-18 (0.5-1.0) were below the lower control limits. Reported results for these elements were flagged as estimated, 'UJ' or 'J', with low bias indicated due to matrix effects.

Recoveries of all ICP analytes except barium^{*} and iron^{*} were below the lower recovery limits of 75% in the matrix spike of sample RITP-2 (1.5-2); (* barium and iron native sample concentrations were >4x spike added concentrations and therefore were not considered for qualification). Reported results for these elements were flagged as estimated, 'UJ' or 'J', with low bias indicated due to matrix effects.

Recoveries for elements spiked in the post-digestion spike (PDS) samples were not considered for qualification, since the elements were either (a) not applicable for PDS based upon native sample concentration exceeding MS concentration by >4x, or (b) inappropriate spike-added concentrations in the PDS sample, which should be at either 2x element RL value or 2x native sample concentration, whichever is greater.

Precision (RPD) values for iron and manganese in the matrix duplicate of RITP-9 (0-2) exceeded the soil guidance limit of 35% (at 36% and 41%, respectively).

Serial dilution sample %D values exceeded 10.0%, while undiluted sample concentrations were >50x IDL values for aluminum, barium, calcium, iron, magnesium, manganese, nickel and zinc in sample RITP-2 (1.5-2), and were flagged 'J', as quantitatively estimated values, in associated positives for these elements above 50x IDL; negative bias is suggested, due to matrix effects, since the undiluted concentrations were lower than the adjusted dilution values.

Serial dilution sample %D values exceeded 10.0%, while undiluted sample concentrations were >50x IDL values for nickel and zinc in sample RITP-9 (0-2), and were flagged 'J', as quantitatively estimated values, in associated positives for these elements above 50x IDL; negative bias is suggested, due to matrix effects, since the undiluted concentrations were lower than the adjusted dilution values.

Samples RITP-5 (3.5-4.5) and RITP-DUPL1 were identified as a collocated field duplicate pair. Precision values between the samples for barium, copper and mercury exceeded the applicable limits of either 35% RPD or delta >MRL. Results for these elements in both collocated samples were flagged as estimated, 'J', with indeterminate bias direction.

QC parameters for total cyanide were within limits. No data qualifiers for cyanide were necessary.

SECTION H

Overall Recommendations

The results of the review and qualification process for the above analytical fractions and associated samples are summarized on the attached QC and Calibration summary tables for each specific analytical fraction, in order to facilitate the end-user's' review of these data. Data qualifiers have been applied directly to the laboratory EDD spreadsheet (database), and are detailed in the corresponding QC / Calibration summaries.

February 16, 2010

Very truly yours, Environmental Quality Associates, Inc.

Chris W. Taylor Vice President

/cwt Attachments

Environmental Quality Associates, Inc.

Page 5 of 5

VOLATILE ORGANICS QC PARAMETER / QUALIFIER SUMMARY SW-846, Method 8260

| Client: | Malcolm Pirnie, Inc. | Project: | Flexo Site R.I. ; Seneca St. | Laboratory Job No.: | <u>RSJ0961</u> |
|---------------|----------------------|-------------|------------------------------|------------------------|----------------|
| Review Level: | NYSDEC 'DUSR' | Laboratory: | TestAmerica Buffalo | | |

A. HOLDING TIMES (NYSDEC-ASP)

AQUEOUS MATRIX: 10 DAYS MAX. FROM VTSR TO ANALYSIS, IF PRESERVED TO pH <2 & 4 DEGREES C 7 DAYS MAX. FROM VTSR TO ANALYSIS, IF NOT PRESERVED TO pH <2 & 4 DEGREES C AQUEOUS MATRIX: NON-AQUEOUS MATRIX: 10 DAYS MAXIMUM FROM VTSR TO ANALYSIS, IF PRESERVED TO 4 +/- 2 DEGREES C NON-AQUEOUS MATRIX: 7 DAYS MAXIMUM FROM VTSR TO ANALYSIS, IF NOT PRESERVED TO 4 +/- 2 DEGREES C All non-aqueous samples were analyzed within & days of VTSR.

B. METHOD BLANKS

| Date Analyzed | Blank ID (-BLK1) | <u>File ID</u> | <u>Matrix</u> | Analytes Present | Conc., ppb | Affected Samples |
|---------------|-------------------|----------------|---------------|--------------------|------------|-------------------|
| 10/19/09 | 9J19018 | F1028 | soil | none | n/a | n/a |
| 10/22/09 | 9J22040 | F1169 | soil | none | n/a | n/a |
| 10/23/09 | 9J23031 | F1194 | soil | none | n/a | n/a |
| 10/23/09 | 9J23102 | F1220 | soil | cyclohexane | 1,3 J | RITP-4 (1-1.5RE); |
| | | | | methylene chloride | 2.0 J | RITP-8 (0.5-1.2); |
| QA Action : | RITP-8 (0.5-1.2) | MeCl2 to 6.4 U | | - | | RITP-18 (0.5-1.0) |
| | RITP-18 (0.5-1.0) | MeCl2 to 11 U | | | | • • • • |

C. SURROGATE RECOVERY

Surrogate recoveries for all SDG field samples were within acceptable limits.

| D. | . MATRIX SPIKE / DUPLICATE | | RITP-18 0.5-1.0 | | | | |
|----|----------------------------|-------------|--|------------------------|-------------|-------------|--|
| | Compound | Recovery % | QA Action | | | | |
| | benzene | 68, 69 / 79 | Flag results for low-recovery targets as estimated 'U J' or 'J', in native sample or | | | | |
| | chlorobenzene | 54, 51 / 76 | with indication of low bias in RL value or reported positive result. | | | | |
| | toluene | 63, 63 / 74 | | | | | |
| | trichloroethene | 61, 59 / 77 | MS/MSD precision | e within acceptable li | mits. | | |
| E. | BLANK SPIKE (LCS) | | 9J19018-BS1 | 9J22040-BS1 | 9J23031-BS1 | 9J23102-BS1 | |

E. BLANK SPIKE (LCS)

Recoveries of all reported analytes were within limits in associated Blank Spike samples.

F. INTERNAL STANDARDS (IS)

IS recoveries & RTs for all SDG samples were within acceptable limits.

G. FIELD DUPLICATE PRECISION RITP-5 3.5-4.5 RITP-DUPL#1

Criteria: if both results >5x RL, <50%RPD; if either or both <5x RL, <RL

| Compound ID | <u>RITP-5 3.5-4.5</u> | <u>RITP-DUPL#1</u> | RPD,% | Difference, ug/Kg | QA Action |
|-------------|-----------------------|--------------------|-------|-------------------|--|
| 2-butanone | 120 | 14 | 158 | 106 | Flag results >criteria 'J'; quantitatively |
| acetone | 410 | 86 | 131 | 324 | estimated w/ indeterminate bias directic |
| MeCl2 | 24 | 2.3 | 165 | 21.7 | |

Note: Sample RITP-5 3.5-4.5 was analyzed at a 5x dilution, while the duplicate was analyzed undiluted.

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VOLATILE ORGANICS CALIBRATION SUMMARY SW-846, Method 8260

Client: Malcolm Pirnie, Inc.

Review Level: NYSDEC 'DUSR'

Laboratory: TestAmerica Buffalo

Project: Flexo Site R.I.; Seneca SI.

A. INSTRUMENT PERFORMANCE (BFB TUNE)

| TUNE DATE: | 10/17/09 | 10/19/09 | 10/22/09 | 10/23/09 | 10/23/09 |
|-------------------------|----------|----------|----------|----------|----------|
| TUNE FILE: | F1001.D | F1024.D | F1164.D | F1190.D | F1215.D |
| BFB INJECTION TIME: | 12:28 | 10:36 | 10:58 | 10:46 | 21:30 |
| LAST SAMPLE INJECTION: | 16:38 | 20:28 | 20:58 | 20:39 | 9:17 |
| m/z RATIOS ACCEPTABLE ? | Yes | Yes | Yes | Yes | Yes |

B. INITIAL CALIBRATION

| CALIBRATION DATE : | 10/17/09 |
|------------------------------|---------------------|
| FILE IDs : | F1003-04; 06-07; 11 |
| ALL target RRFs > 0.05? | Yes |
| SPCC RRFs > min.values? | Yes |
| CCC %RSDs < 30% 7 | Yes |
| All Targets < 15% RSD? | Yes |
| If No, regression r > 0.99 ? | n/a |
| (If No, list compounds)===> | |
| Associated samples: | all |

C. CONTINUING CALIBRATIONS

| 10/19/09 |
|------------------------|
| F1025.D |
| Yes |
| Yes |
| Yes |
| NO |
| bromomethane (-) |
| carbon disulfide (-) |
| chloroethane (-) |
| methyl acetate (+) |
| RITP-5 3.5-4.5 |
| |

Laboratory

Job No.:

<u>RSJ0961</u>

C. CONTINUING CALIBRATIONS

| CALIBRATION DATE : | 10/22/09 | | 10/23/09 | 10/23/09 |
|-----------------------------|----------------------------|--------------------|---------------------------|--------------------------------------|
| FILE ID : | F1166.D | | F1191.D | F1218.D |
| ALL target RRFs > 0.05 ? | Yes | | Yes | Yes |
| SPCC RRFs > min. values ? | Yes | | Yes | Yes |
| CCC %Ds < 20% ? | Yes | | Yes | Yes |
| Targets < 20%D or Drift ? | NO | | NO | NO |
| (If No, list compounds)===> | 112triCI122triFethane (-) | vinyl acetate (-) | 112tnCI122tnFethane (+) | 112triCl122triFethane (+) |
| | 12diBr3Clpropane (-) | | 12diBr3Clpropane (-) | 12diBr3Cipropane (-) |
| | 2-butanone (-) | bromomethane (+) | methyl acetate (-) | methyl aceiate (-) |
| | bromoform (-) | chloroethane (+) | chloroethane (+) | chioroethane (+) |
| | carbon disulfide (-) | diCldiFmethane (+) | toluene-d8 (+) | triCIFmethane (+) |
| | cyclohexane (-) | 1riCIFmeihane (+) | triClFmethane (+) | |
| | methyl cyclohexane (-) | | | |
| Affected samples: | RITP-1 1.4-2.0; RITP-2 1.9 | 5-2; RITP-3 0-2 | RITP-2 0-2; RITP-3 1-1.5; | RITP-4 1-1.5 RE; RITP-8 0.5-1.2; |
| | | | RITP-4 1-1.5; RITP-5 0-2; | RITP-18 0.5-1.0; RITP-18 0.5-1.0 MS, |
| | | | RITP-DUPL#1 | MSD |

QA ACTION : Compounds w/ %D >-20% (-) ; flag as estimated ('UJ' or 'J') w/ negative bias on RL or reported positive result.

Compounds w/ %D >+20% (+); flag as estimated ('J') w/ positive bias on reported positive result.

D. SAMPLE RESULT VERIFICATION

| | ,2,4-trichlorobenzene | | 1,4-dichlorobenzene-d4 | Non-Aqueous (low-level) |
|------------------|-----------------------|-------|------------------------|--|
| REPORTED VALUE : | 250 | ug/Kg | | (Ax) (Is) (Df) (Ais) (RRF) (Ws) (D) |
| Ax | ls | Df | | |
| 244752 | 250 | 1.0 | | |
| 311135 | 0.926 | 1.16 | 0.736 | 1 |
| Ais | RRF | Ws | D | |
| | | | | _ |

SEMI-VOLATILE ORGANICS QC PARAMETER / QUALIFIER SUMMARY SW846 8270

| | | SW | 846 8270 | | | |
|----------------------------------|---------------------------------------|----------------|--|------------------------------|---------------------|------------------|
| | • 14-1 | Burton | | | Laboratory | |
| Client | : Malcolm Pirnie, Inc. | Project: | Flexo Site R.I. ; Seneca | <u>St.</u> | Job No.: | <u>RSJ0961</u> |
| | | | | | | |
| Review Level | : NYSDEC 'DUSR' | Laboratory | TestAmerica Buffalo | | | |
| | . <u>INTODEO DOON</u> | Eaboratory. | Test-mened benalo | | | |
| HOLDING TIMES (NYSDEC-A | SP) | | | | | |
| | | | | | | |
| AQUEOUS MATRIX: | | 5 DAYS MAX. | VTSR TO EXTRACTION | / 40 DAYS MAX, EX | TRACTION TO | ANALYSIS |
| | | SAMPLES AN | ID EXTRACTS MUST BE | MAINTAINED AT 4 | -/- 2 DEGREES | C |
| NON-AQUEOUS MATRIX: | | | K. VTSR TO EXTRACTIO | | | |
| | | SAMPLES AN | ID EXTRACTS MUST BE | MAINTAINED AT 4 + | -/- 2 DEGREES | C |
| | | | | | | |
| All non-aqueous samples were e | extracted within \underline{z} days | sorvisk; alls | ampies were analyzed wit | nin <u>zo</u> days of extrac | аоп. | |
| QA Action | · n/a | | | | | |
| 6811101011 | | | | | | |
| METHOD BLANKS | | | | | | |
| Blank ID | File ID | Date Extracted | <u>Matrix</u> | Analytes Present | Conc., ppb | Affected Batch |
| 9J16094-BLK1 | W7956.D | 10/17/09 | soil | попе | n/a | 9J16094 |
| 9J17099-BLK1 | W7962.D | 10/17/09 | soil | попе | n/a | 9J16099 |
| 9J17040-BLK1 | W7996.D | 10/18/09 | soil | попе | n/a | 9Jt7040 |
| FIELD BLANKS | | | | | | |
| No field blanks were submitted v | with this SDG. | | QA Action: | п/а | | |
| | | | | | | |
| SURROGATE RECOVERY | | | | | | |
| Sample ID | Compound | Recovery | QA Action | | | |
| RITP-2 0-2 | 2,4,6-triBrphenol | none | п/a; this sample was con | | | |
| | 2-fluorophenol | none | the normal 1.0 mL, due to | | | ' |
| RITP-9 0-2 | nitrobenzene-d5 | none | Results are reported from | | | |
| RITP-9 0-2 | 2,4,6-triBrphenol | 36 / 39% | n/a; this sample was ana lower detector sensitivity | | litution; the low h | ecovery reflects |
| | | | nower detector sensitivity | at this biotion level | | |
| MATRIX SPIKE / DUPLICATE | RITP-9 0-2 | | | | | |
| Compound | MS, MSD % | RPD % | RITP-9 0-2 Positive? | DV Flag | Bias | |
| 2,4,5-Trichlorophenol | 51 | | 1411 -5 0-E1 03m46; | | low | |
| 2,4,6-Trichlorophenol | 54, 58 | | | UJ | low | |
| 2,4-Dinitrophenol | 0,0 | | | ŰĴ | iow | |
| 2-Nitroaniline | 0, 0 | | | ŰĴ | low | |
| 3,3'-Dichlorobenzidine | 0, 0 | | | UJ | low | |
| 3-Nitroaniline | 53, 53 | | | U1 23 | low | |
| 4,6-Dinitro-2-methylphenol | 224, 0 | nc | | UJ | 1011 | |
| 4-Chloroaniline | 0, 0 | | | UJ | low | |
| 4-Nitroaniline | 36, 39 | | | UJ | low | |
| 4-Nitrophenol | 0, 0 | | | UJ | low | |
| Acenaphthene | 197 | 73 | | UJ | 1011 | |
| Anthracene | 397 | 123 | | ŰĴ | | |
| Atrazine | 0, 0 | | | UJ | low | |
| Benzaldehvde | 0,0 | nC | | UJ | low | |
| Benzo(a)anthracene | 453 | 118 | yes | J | high | |
| Benzo(a)pyrene | 398 | 101 | yes | J | high | |
| Benzo(b)fluoranthene | 453 | 118 | yes | J | high | |
| Benzo(ghi)perylene | 303 | 85 | yes | Ĵ | high | |
| Benzo(k)fluoranthene | 324 | 84 | | ŪJ | | |
| Bis(2-chloroethoxy)methane | 57, 53 | | | Ū.J | low | |
| Caprolactam | 0,0 | | | U.J | low | |
| Carbazole | 133 | 43 | | UJ | | |
| Chrysene | 422 | 107 | yes | J | high | |
| Dibenzo(a,h)anthracene | 160 | 55 | | UJ | 5 | |
| Dibenzofuran | 172 | 58 | | UJ | | |
| Di-n-octyl phthalate | 55, 58 | | | IJ | low | |
| Fluoranthene | 1060 | 151 | yes | J | high | |
| Fluorene | 226 | 85 | | UJ | | |
| Hexachlorocyclopentadiene | 0, 0 | | | UJ | low | |
| Indeno(1,2,3-cd)pyrene | 277 | 91 | yes | J | high | |
| Pentachiorophenol | 0, 0 | | | UJ | low | |
| Phenanthrene | 1240 | 161 | yes | J | high | |
| Pyrene | 819 | 140 | yes | J | high | |
| | | | | | | |

Α.

В.

C.

D.

SEMI-VOLATILE ORGANICS QC PARAMETER / QUALIFIER SUMMARY <u>SW846 8270</u>

| | | | SW | 846 8270 | | | |
|----|---|--|---|----------------------------|---|----------------------------------|----------------|
| | Client: | <u>Malcolm Pirnie, Inc.</u> | Project: | Flexo Site R.I. ; Seneca S | <u>त्र.</u> | Laboratory Job No.: | <u>RSJ0961</u> |
| | Review Level: | NYSDEC 'DUSR' | Laboratory: | TestAmerica Buffalo | | | |
| D. | MATRIX SPIKE / DUPLICATE Compound 2.4-Dinitrophenol Atrazine Bis(2-chloroethoxy)methane | <u>RITP-18 0.5-1.0</u> <u>MS, MSD %</u> 0, 0 57, 55 60 | RPD % | RITP-18 0.5-1.0 Positive? | DV Flag UJ UJ UJ | <u>Bias</u> Iow Iow Iow | |
| E. | BLANK SPIKE (LCS) Compound Atrazine N-nitrosodiphenylamine benzo(a)pyrene Atrazine 2,4-dinitrotoluene 3,3'-dichtorobenzidine N-nitrosodiphenylamine benzo(a)pyrene Atrazine Bis(2-chloroethoxy)methane | <u>9J16094-BS1</u> <u>Recovery %</u> 70 121, 130 <u>128</u> <u>9J16099-BS1</u> 72 128 129 136 129 136 <u>9J17040-BS1</u> 67 57 | <u>DV Flag</u> ປປ J ປປ J J J J ປJ ປJ | 1 | Samples Affected RITP-5 3.5-4.5 RITP-2 0-2 RITP-2 0-2 RITP-2 1.5-2 RITP-3 0-2 RITP-7 0-2 RITP-7 0-2 RITP-10 0-2 RITP-13 0-2 RITP-13 0-2 RITP-13 0-2 RITP-14 0-2 | | |
| | ****** | | | | RITP-8 0.5-1.2 RITP-18 0.5-1.0 | | |

F. INTERNAL STANDARDS (IS)

IS recoveries & RTs for all SDG samples were within acceptable limits.

G. FIELD DUPLICATE

RITP-5 3.5-4.5 was identified as the collocated sample with RITP-DUPL1; both samples were reported from 5x extract dilutions and all target compounds were reported as non-detects at the elevated RL values.

SEMI-VOLATILE ORGANICS CALIBRATION SUMMARY SW846 METHOD 8270C

| | | | | Laboratory | |
|--------------------|-----------------------------|---|-----------------------------------|-------------------------|----------|
| Client: | Malcolm Pirnie, Inc. | Project: | Flexo Site R.I. ; Seneca St. | Job No.: | RSJ0961 |
| | | | | | |
| | | | | | |
| Review Level: | NYSDEC 'DUSR' | Laboratory: | TestAmerica Buffalo | | |
| | | | | | |
| А. | INSTRUMENT PERFORMAN | | 1 | l (a/aa/aa | |
| | TUNE DATE: | 1 · · · · · · · · · · · · · · · · · · · | 10/19/09 | 10/20/09 | 11/13/09 |
| | TUNE FILE: | W7078.D | W7946.D | W7993.D | W8589.D |
| | DFTPP INJECTION TIME: | 09:53 | 09:28 | 09:44 | 10:02 |
| LAST INJECTIO | N WITHIN 12-HR, WINDOW ? | Yes | Yes | Yes | Yes |
| | m/z RATIOS ACCEPTABLE ? | Yes | Yes | Yes | Yes |
| _ | | | | | |
| В. | INITIAL CALIBRATION | | 00/10/00 | | |
| | SPCC Compounds | CALIBRATION DATE : | 09/t6/09 | 11/13/09 | |
| | Base/Neutrals | FILE ID: | W7079-84; 86-91.D | W8590-95; 598-603.D | |
| | N-Nitroso-di-n-propylamine | All target RRFs >0.05 ? | Yes | Yes | |
| | Hexachlorocyclopentadiene | All target %RSDs < 15% ? | No | No | |
| | Acids | If No, Regression established? | Yes | Yes | |
| | 2,4-Dinitrophenol | Correlation > 0.99 ? | Yes | Yes | |
| | 4-Nitrophenol | (If No, list compounds) ==> | | | |
| | MINIMUM RRF = 0.050 | | | | |
| | | QA ACTION: | <u>n/a</u> | <u>n/a</u> | |
| | CCC Compounds | | | | |
| | Base/Neutrals | | | | |
| | Acenaphthene | | | | |
| | 1,4-Dichlorobenzene | | | | |
| | Hexachlorobutadiene | | | | |
| | Diphenylamine | NOTE: | | | |
| | Di-n-octylphthalate | Linear or non-linear regression a | cceptable alternatives for compou | nds w/ %RSD >15%. | |
| | Fluoranthene | Linear regression r values must b | e 0.99 minimum for these compo | unds. | |
| | Benzo(a)pyrene | | 0.99 minimum for these compound | ds, with minimum 6-pts. | |
| | Acids | Jor second-order, and minimum 7 | -pts. for third-order equations. | | |
| | 4-Chloro-3-methylphenol | | | | |
| | 2,4-Dichlorophenol | | | | |
| | 2-Nitrophenol | | | | |
| | Phenol | | | | |
| | Pentachlorophenol | | | | |
| | 2,4,6-Trichlorophenol | | | | |
| | MAXIMUM %RSD = 30.0% | | | | |
| | MAXIMUM %D = 20.0% | | | | |
| | <u> </u> | | | | |
| C. | CONTINUING CALIBRATION | S | | | |
| | | | | | |
| | CALIBRATION DATE : | 10/19/09 | 10/20/09 | 11/13/09 | |
| | FILE ID: | W7947,48 | W7994, 95 | W8593, 8601 | |
| | All target & SPCC RRFs >0.0 | Yes | Yes | Yes | |
| | CCC %Ds < 20% ? | Yes | Yes | Yes | |
| All targets +/- 20 | %D or 80 -120% True Value? | NO | NO | Yes | |
| - | | 2,2'-Oxybis(1-Clpropane) -28% | 2,2'-Oxybis(1-Clpropane) -27% | | |
| | | | benzo(k)fluoranthene +22% | | |
| | Affected samples : | | RSJ0997-01, 02, 05-09 | RSJ0963-06, 07, 08 | |
| | | | | | |

 QA Action :
 For targets w/ %D >-20% :
 Flag non-detects 'UJ' and positives 'J' in affected samples; negative bias on RL or positive value.

 For targets w/ %D >+20% :
 Flag positives 'J' in affected samples; positive bias on positive value.

SEMI-VOLATILE ORGANICS CALIBRATION SUMMARY SW846 METHOD 8270C

| CLIENT: PROJECT: <u>I</u> | <u>Malcolm Pirnie, Inc.</u> Flexo Site R.I. ; Seneca St. | | Lab Job No.: | RSJ0961 | |
|------------------------------|---|--------------|---------------------------------------|-------------------------|---------------------------------------|
| Review Level: | NYSDEC 'DUSR' | | Laboratory : | TestAmerica Buffalo | |
| | | | | | |
| SAMPLE RESULT VE | | | | | |
| SAMPLE ID: | RITP-5 0-2 | (RSJ0963-07) | | | |
| COMPOUND: | fluoranthene | | Int. Std.: | phenanthrene-d10 | |
| REPORTED VALUE: | 18000 | ug/Kg | | | |
| Γ | Ax | ls | Vt | Df | GPC |
| ug/Kg = | 166405 | 40 | 1000 | 50 | 1.0 |
| -33 | 546016 | 1.388 | t.0 | 30.27 | 0.821 |
| ſ | Ais | RRF | Vi | Ws | D |
| | | ********** | · · · · · · · · · · · · · · · · · · · | | · · · · · · · · · · · · · · · · · · · |
| ug/Kg = | 17665 |] | Result verified ? | Yes | OK - rounding |
| Where : | A | _ | | | |
| where : | Ax | = | area of quant ion for targ | | |
| | ls | = | amount of internal stands | | |
| | Vt | = | volume of extract concer | ntrate, uL | |
| | Df | = | Extract dilution factor | | |
| | GPC | = | GPC factor (1.0 for no cl | eanup; 2.0 for GPC clea | nup) |
| | Ais | = | area of quant ion for inte | rnal standard | |
| | RRF | = | relative response factor, | | |
| | Vi | - | extract volume injected, | | |
| | Ws | Ξ | sample mass extracted, | | |
| | D | = | % Solids / 100 | a () | |
| | - | | | | |

*

D.

PCB ANALYSIS QC PARAMETER / QUALIFIER SUMMARY <u>SW-846 Method 8082</u>

| Client: Malcoln | n Pirnie, Inc. | Project: <u>F</u> | ilexo Site R.I. ; Seneca St. | Laboratory Job No.: | RSJ0961 | |
|--------------------------|-----------------|---|------------------------------|------------------------|---------|--|
| Review Level: <u>NYS</u> | DEC 'DUSR' Labo | oratory: <u>T</u> | estAmerica Buffalo | | | |
| HOLDING TIMES (NYSDEC | <u>D-ASP)</u> | | | | | |
| AQUEOUS MATRIX: | | 5 DAYS MAX. VTSR TO EXTRACTION / 40 DAYS MAX. EXTRACTION TO ANALYSIS SAMPLES AND EXTRACTS MUST BE MAINTAINED AT 4 +/- 2 DEGREES C | | | | |
| NON-AQUEOUS MATRIX: | | 10 DAYS MAX. VTSR TO EXTRACTION / 40 DAYS MAX. EXTRACTION TO ANALYSIS SAMPLES AND EXTRACTS MUST BE MAINTAINED AT 4 +/- 2 DEGREES C | | | | |

Non-aqueous samples were extracted within 4 days of VTSR; samples were analyzed within 1 day of extraction.

QA Action : n/a

B. METHOD BLANKS

Α.

| Blank ID | Date Extracted | Date Analyzed | Matrix | Analytes Present | Conc., ppb |
|--------------|----------------|---------------|--------|------------------|------------|
| 9J17039-BLK1 | 10/18/09 | 10/19/09 | soil | none | n/a |
| 9J19084-BLK1 | 10/19/09 | 10/20/09 | soil | none | n/a |

QA Action :

n/a

C. INSTRUMENT BLANKS

Injection logs indicated that instrument blanks were run following each CCV.

D. SURROGATE RECOVERY

| Sample ID | Surrogate | Recovery / Bias | QA Action |
|--------------|-------------|-----------------|---|
| RITP-2 0-2 | TCMX & DCBP | no recovery | n/a; samples were run at dilution due to high levels of |
| RITP-3 0-2 | TCMX & DCBP | no recovery | target analytes. Surrogates were diluted out. |
| RITP-3 1-1.5 | TCMX & DCBP | no recovery | |
| RITP-4 1-1.5 | TCMX & DCBP | no recovery | |
| RITP-7 0-2 | DCBP 1 | 11/34% low | n/a; recovery on second column was within limits. |
| | | | |

E. MATRIX SPIKE / DUPLICATE RITP-9 0-2 RITP-18 0.5-1.0

MS / MSD recoveries and precision values were within limits.

F. BLANK SPIKE / BLANK SPIKE DUPLICATE (LCS / LCSD)

LCS / LCSD recoveries and precision values were within limits.

G. SAMPLE QUALITATIVE VERIFICATION

Aroclor-1254 and/or Aroclor-1260 (AR1254; AR1260) were reported in several SDG samples.

The following samples exhibited inter-column concentrations which exceeded 25% difference (%D), and were qualified as indicated.

| Sample ID (RITP-) | Aroclor (AR-) | <u>% Diffference</u> | QA Action |
|-------------------|---------------|----------------------|--|
| 2 0-2 | 1260 | 58 | Flag reported result 'J', as quantitatively estimated value |
| 1 1.4-2.0 | 1260 | 57 | Flag reported result 'J', as quantitatively estimated value |
| 2 1.5-2 | 1260 | 36 | Flag reported result 'J', as quantitatively estimated value |
| 3 0-2 | 1260 | 100 | Flag reported result 'J', as quantitatively estimated value |
| 3 1-1.5 | 1254 | 35 | Flag reported result 'J', as quantitatively estimated value |
| 3 1-1.5 | 1260 | 134 | Flag reported result 'NJ', as quantitatively estimated value |
| DUPL#1 | 1260 | 62 | Flag reported result 'J', as quantitatively estimated value |
| 5 3.5-4.5 | 1260 | 48 | Flag reported result 'J', as quantitatively estimated value |
| 9 0-2 | 1254 | 26 | Flag reported result 'J', as quantitatively estimated value |
| 13 0-2 | 1260 | 37 | Flag reported result 'J', as quantitatively estimated value |
| 14 0-2 | 1254 | 30 | Flag reported result 'J', as quantitatively estimated value |
| | | | |

H. FIELD DUPLICATE PRECISION

RITP-DUPL#1 was identified as a field duplicate of RITP-5 3.5-4.5. Aroclors-1254 and -1260 were reported positive in both samples. The RPD between duplicate sample results was calculated as 69.6% for AR1254 and 66.7% for AR1260.

QA Action : Flag reported AR1254 and AR1260 in parent and duplicate samples 'J', as estimated values, with indeterminate bias.

PCB ANALYSIS CALIBRATION SUMMARY <u>SW-846 Method 8082</u>

Client: Malcolm Pirnie, Inc.

Project: Flexo Site R.I.; Seneca St.

Laboratory Job No.:

Review Level: <u>NYSDEC 'DUSR'</u> Laboratory: <u>TestAmerica Buffalo</u>

A. INITIAL CALIBRATION

| CALIBRATION DATE : | 10/11/09 | HP6890-7 | 11/09/08 | HP5890-19 |
|-------------------------|----------------------|-------------|--------------------|------------------|
| FILE IDs : | 7a94146-152 | | 19a49175-181 | |
| Mean RSD ≤ 20%? | yes | | yes | |
| Lin Regression r>0.99 ? | yes | | n/a | |
| 2nd-order COD >0.99 ? | n/a | | n/a | |
| Associated samples : | RSJ0997-01,02,05-0 | 9 | RSJ0963-01-09 | |
| | (collected 10/15/09; | xtr. 10/19) | (collected 10/14/0 | 09; xtr. 10/18)) |

B. CONTINUING CALIBRATIONS (CCV)

| | HP6890-7 | | | | |
|--|-------------|-------------|-------------|--|--|
| CALIBRATION DATE : | 10/19/09 | 10/19/09 | 10/19/09 | | |
| FILE IDs : | 7a96051 | 7a96063 | 7a96072 | | |
| TIME : | 11:40 | 15:19 | 18:04 | | |
| At start of sequence? | Yes | n/a | n/a | | |
| After every 10 samples? | n/a | Yes | n/a | | |
| At end of sequence? | n/a | n/a | Yes | | |
| %D ≤ 15? | NO | NO | NO | | |
| If No, list compounds ===> | AR1260 -22% | AR1260 -17% | AR1260 -17% | | |
| | | 1 | | | |
| Affected Samples : RSJ0997-01,02,05-09 | | | | | |

QA ACTION: %D results were >15% for AR1260 for at least one quant. peak; since responses were negative with respect to ICAL average (i.e., reduced sensitivity) reported results for AR1260 were flagged as quantitatively estimated, 'U J' or 'J', with low bias indicated.

| HP5890-19 | | | | | | |
|----------------------------|---------------|-------------|-------------|--|--|--|
| CALIBRATION DATE : | 10/20/09 | 10/20/09 | 10/20/09 | | | |
| FILE IDs : | 19a072 | 19a080 | 19A088 | | | |
| TIME : | 07:40 | 09:37 | 11:35 | | | |
| At start of sequence? | Yes | n/a | n/a | | | |
| After every 10 samples? | n/a | Yes | n/a | | | |
| At end of sequence? | n/a | n/a | Yes | | | |
| %D <u>≤</u> 15? | NO | NO | NO | | | |
| If No, list compounds ===> | AR1016 -20% | AR1016 -23% | AR1016 -22% | | | |
| | AR1260 -16% | AR1260 -21% | AR1260 -19% | | | |
| Affected Samples : | RSJ0963-01-09 | | | | | |

QA ACTION: %D results were >15% for AR1016 &/or AR1260 for at least one quant. peak; since responses were negative with respect to ICAL average (i.e., reduced sensitivity) reported results for AR1016 and AR1260 were flagged as quantitatively estimated, 'U J' or 'J', with low bias indicated.

RSJ0961

Page 2 of 2

POLYCHLORINATED BIPHENYLS (PCBs) CALIBRATION SUMMARY SW846 METHOD 8082

| | | <u> </u> | | <u></u> | | | |
|----|---|--------------------------|------------------------|---------------------|----------------|--|---------------|
| | Client: | Malcolm Pirnie, Inc. | Project: | Flexo Site R.I. : S | eneca St. | Laboratory Job No.: | RSJ0961 |
| | Review Level: | NYSDEC 'DUSR' | Laboratory: | TestAmerica Buff | alo | | |
| D. | SAMPLE RESULT VERI | FICATION | | | | | |
| | <u>Sample ID</u> RITP-9 0-2 File ID = 7a96058 | <u>Analγte</u> AR1260 | Reported Result 240 | | | <u>Column 1</u> peak at RT = 5.70 minutes | |
| | Primary column | | _ | _ | - | | |
| | | peak response | final volume, uL | dilution factor | | | |
| | ug/Kg = | 419831 | 10000 | 1.0 | ug/Kg ≍ | 238 | |
| | | 778911 | 30.43 | 0.7447 | | | |
| | | CalFactor | sample wet weight | %solids/100 | Ţ | | |
| | | | | Res | ult verified ? | yes | OK - rounding |

٠

| | Client: | <u>Malcolm Pirnie, Inc.</u> | Project: | Flexo Site R.I. ; Ser | eca St. | Laboratory Job No.: | <u>RSJ0961</u> |
|----|---------------|--|--|--|--|--|--|
| | Review Level: | NYSDEC 'DUSR' | | | | Laboratory: | TestAmerica Buffalo |
| A. | CALIBRATION | • | | $\frac{CCV}{90 - 110\%}$ 80 - 120% 85 - 115% dards, r ² >/ = 0.995 dards, r ² >/ = 0.995 | Outliers ? none none none none none | | |
| | | CRDL Standards ICP Analytes Mercury Cyanide | CRI CRA Mid-Range | <u>% Recovery</u> 70 - 130% 70 - 130% 70 - 130% | <u>Outliers ?</u> none none n/a | | |
| В. | <u>BLANKS</u> | | < RL < RL | | <u>Outliers ?</u> none none | | |
| C. | ICP INTERELEN | | <u>CSA / ICSAB)</u> <2x RL for RL < 80 - 120% reco | - | <u>Outliers ?</u> none none | | |
| D. | MATRIX SPIKE | <u>RITP-9 0-2</u> 75 - 125% recovery (if Affects samples in: | sample conc. • Prep Batch # | < 4x spike conc.) 9J22107 | <u>Outliers ?</u> Sb Mg | | QA ACTION Flag reported results estimated, /UJ' or 'J', w/ low bias indicated |
| | | <u>RITP-18 0.5-1.0</u> 75 - 125% recovery (if Affects samples in: | • | < 4x spike conc.) 9J22107 | | 71; 72% 55; 59% 55; 45% 0% 66% 70% | QA ACTION Flag reported results estimated, 'UJ' or 'J', w/ low bias indicated Flag reported results estimated, 'UJ' or 'J', w/ low bias indicated |
| | | RITP-2 1.5-2 75 - 125% recovery (if * Ba and Fe sample c Affects samples in: | | • • | Outliers ? All ICP analy Ba* and Fe* | | QA ACTION Flag reported results estimated, 'UJ' or 'J', w/ low bias indicated |
| E. | POST-DIGESTIC | <u>DN SPIKE (PDS)</u> [only required for non- 75 - 125% recovery; P 2x sample conc., whic | DS conc. shoul | | е л F | either (a) not a native sample PDS spike add | npliant PDS recoveries were pplicable to analytes due to MS concs. >4x spike added or (b) ded was too low relative to native ntration (e.g., Ba, Ca, Fe, Mn) |
| F. | | DUPLICATE (OR MAT) Max. 35% RPD for nor Max. (+/-) CRQL value | n-aqueous sam | ples > 5x CRDL | <u>Outliers ?</u> Fe Mn | <u>% RPD</u> 36% 41% | <u>Sample ID</u> RITP-9 0-2 RITP-9 0-2 |

INORGANICS / METALS ANALYSIS OC PARAMETER / CALIBRATION / QUALIFIER SUMMARY

| | Client: Malasla Dimis | I Drojasti Elava Sita I | 2 L : Sanana St | | Laboratory |
|----|---|---|------------------|---|--|
| | Client: Malcolm Pirnie, | I Project: Flexo Site I | K.I.; Seneca St. | | Job No.: <u>RSJ0961</u> |
| R | eview Level: NYSDEC 'DUSF | <u> </u> | | | Laboratory: TestAmerica Buffalo |
| G. | LABORATORY CONTROL S | SAMPLE | Outliers ? | | |
| | Recovery within range for no | n-aqueous samples | none | | |
| H. | SERIAL DILUTION SAMPLE | RITP-2 1.5- | 2 Outliers ? | <u>%D</u> | QAACTION |
| | Maximum 10.0% D if | - | AI | -11 | Flag results estimated 'J' for |
| | undiluted sample > 50x IDL | | Ba | -11 | listed elements results >50x IDLs |
| | | | Ca | -12 | w/ negative bias indicated |
| | | | Fe | -12 | |
| | | | Mg | -13 | |
| | | | Mn | -11 | |
| | | | Ni | -12 | |
| | | | Zn | -11 | |
| | | RITP-9 0-2 | Outliers ? | <u>%D</u> | QA ACTION |
| | | | Ni | -11 | Flag results estimated 'J' for |
| | | | Zn | -12 | listed elements results >50x IDLs |
| | | <u></u> | | | w/ negative bias indicated |
| L | FIELD DUPLICATE | TP-5 3.5-4.5 TP-DUPL# | 1 Outliers ? | RPD.% | |
| 1. | Criteria: if both results >5x M | | Ba | 53 | QA ACTION Flag results estimated 'J' for listed |
| | if either or both <5x MRL, de | | Cu | 41 | elements; indeterminate bias direction |
| | | | | lta = 0.044 (>MRL) | |
| | | | 0 | () | |
| J. | NYSDEC-ASP HOLDING TI | MES (from VTSR) | | | |
| | Metals except mercury | 6 months | All samples wer | e analyzed within all | owable holding times. |
| | Mercury | 26 days | | | |
| | Cyanide | 12 days | | | |
| К. | VERIFICATION OF INSTRU | MENTAL PARAMETERS | Frequency | | Outliers ? |
| | | ent Detection Limits | every 6 months | | date not listed |
| | Interelement Cor | | every 6 months | | date not listed |
| | Linear Range An | | every 6 months | | date not listed |
| | · | · | | | _ |
| L. | VERIFICATION OF REPORT | | Sample ID : | RITP-5 3.5-4.5 | Analyte: Pb |
| | | Re | ported value: | 43.2 | mg/Kg |
| | | | | 43.2 | ngny |
| | <u> </u> | final | 1 | 43.2 | inging |
| | conc. mg/L | x volume, mL | | | אישייא |
| | mg/Kg = 0.28086 | x volume, mL 50 | 1 | 43.2 |] |
| | mg/Kg = 0.28086 0.471 | x volume, mL 50 0.689 | = mg/Kg = [| 43.24 |] |
| | mg/Kg = 0.28086 | x volume, mL 50 | = mg/Kg = [| |] |
| | mg/Kg = 0.28086 0.471 | x volume, mL 50 0.689 | = mg/Kg = [| 43.24 |] |
| | mg/Kg = 0.28086 0.471 wet wgt, gm | x volume, mL 50 0.689 x %solids/100 | = mg/Kg = [| 43.24 Result verified ? |] Yes |
| | mg/Kg = 0.28086 0.471 | x volume, mL 50 0.689 x %solids/100 | = mg/Kg = | 43.24 | Yes Analyte: Hg |
| | mg/Kg = 0.28086 0.471 wet wgt, gm | x volume, mL 50 0.689 x %solids/100 | = mg/Kg = [| 43.24 Result verified ? RITP-18 05-1.0 |] Yes |
| | mg/Kg = 0.28086 0.471 wet wgt, gm | x volume, mL 50 0.689 x %solids/100 ED RESULTS | sample ID : | 43.24 Result verified ? RITP-18 05-1.0 | Yes Analyte: Hg |
| | mg/Kg = 0.28086 0.471 wet wgt, gm VERIFICATION OF REPORT | x volume, mL 50 0.689 x %solids/100 ED RESULTS Re final | sample ID : | 43.24 Result verified ? RITP-18 05-1.0 | Yes Analyte: Hg |
| | mg/Kg = 0.28086 0.471 wet wgt, gm VERIFICATION OF REPORT | x volume, mL 50 0.689 x %solids/100 ED RESULTS Re final x volume, mL | = mg/Kg ≃ [| 43.24 Result verified ? RITP-18 05-1.0 0.486 | Yes Analyte: Hg |

February 18, 2010

Malcolm Pirnie, Inc. Att: Mr. James Richert 50 Fountain Plaza, Suite 600 Buffalo, New York 14202

Re: Flexo Remediation Investigation Site Data Deliverables; Laboratory No. RSK0332

Malcolm Pirnie Project / Task Order No. : 6105-002

Dear Mr. Richert,

Enclosed with this cover letter are the results of our data review of the laboratory deliverables pertaining to the referenced site. The review was conducted according to the guidelines established by NYSDEC's Data Usability Summary Review ('DUSR') process; data flags (qualifiers) were assigned to samples based on guidance contained in EPA Region II's Inorganic and Organic data validation guidelines.

Site Name: Flexo Transparent R.I.; 1132 & 1146 Seneca Street Site, Buffalo, NY

Fractions: Volatile Organics Semi-volatile Organics Polychlorinated Biphenyls (PCBs) TAL Metals + Cyanide

Laboratory: TestAmerica Matrix: Aqueous

Reviewer: Chris Taylor

Prepared By: Environmental Quality Associates, Inc.

<u>SECTION A</u> Sample Information

The above-referenced analytical job numbers / samples were analyzed by TestAmerica Buffalo, Amherst, New York. Samples were analyzed for volatile organics (VOC, 2), semivolatile organics (SVOC, 2), polychlorinated biphenyls (PCB, 1), TAL metals and cyanide (TAL/CN, 1), in addition to any matrix spikes and duplicates for each analytical fraction.

Samples were collected on 11/03/2009, and were received at the laboratory (VTSR) on 11/05/2009 in good condition, at 4.8 degrees Centigrade, with ice noted as present.

SECTION B General Comments

Summary of data completeness and overall quality of data deliverables package

Data deliverables were complete as received.

Malcolm Pirnie, Inc. / Mr. James Richert

February 18, 2010

Overall data quality

Data quality was acceptable, incorporating applied data qualifiers as detailed in the accompanying QC and calibration summary forms, and discussed in the fraction-specific sections below.

SECTION C

Volatile Organic Fraction

No MS/MSD samples were reported for this sample group; no field duplicates were identified for this sample group.

No data qualifications were required for these samples in this fraction.

<u>SECTION D</u>

Semi-volatile Organics

No MS/MSD samples were reported for this sample group; no field duplicates were identified for this sample group.

Calibration verification on 11/11/09 presented %D for 4-methylphenol which exceeded -20%. Results for 4-methylphenol were qualified as estimated, 'UJ', in both samples, with low bias on reported RL values indicated.

SECTION E

Polychlorinated Biphenyls (PCBs)

No MS/MSD samples were reported for this sample group; no field duplicates were identified for this sample group.

Continuing calibration (CCV) response %D results exceeded $\pm 15\%$ for Aroclor 1016 and Aroclor 1260 in both opening and closing CCV on 11/07/09, affecting all samples. Results for the noted Aroclors in affected samples were flagged 'UJ', as estimated RL values, with indeterminate bias indicated due to inconsistent sensitivity in the calibration verifications.

Recovery of Aroclor 1016 in the batch LCS (9K124-BS1) was below the lower limit (59/61%); the reported result for Aroclor 1016 in the associated sample (RIB-4) was flagged 'UJ', as estimated RL value, with low bias indicated.

SECTION G Metals / Wet Chemistry

No MS/MSD samples were reported for this sample group; no field duplicates were identified for this sample group. No serial dilution sample were reported for this sample group.

Arsenic recovered high (+35%) in the low-level CCV standard; the result for As was flagged as estimated, 'J', in sample RIB-4, with slight high bias indicated.

Environmental Quality Associates, Inc.

Malcolm Pirnie, Inc. / Mr. James Richert

February 18, 2010

QC parameters for total cyanide were within limits. No data qualifiers for cyanide were necessary.

SECTION H Overall Recommendations

The results of the review and qualification process for the above analytical fractions and associated samples are summarized on the attached QC and Calibration summary tables for each specific analytical fraction, in order to facilitate the end-user's' review of these data. Data qualifiers have been applied directly to the laboratory EDD spreadsheet (database), and are detailed in the corresponding QC / Calibration summaries.

Very truly yours, Environmental Quality Associates, Inc.

Chris W. Taylor Vice President

/cwt Attachments

Environmental Quality Associates, Inc.

VOLATILE ORGANICS QC PARAMETER / QUALIFIER SUMMARY <u>SW-846, Method 8260</u>

| Client: | Malcolm Pirnie, Inc. | Project: | Flexo Site R.I. ; Seneca St. | Laboratory Job No.: | <u>RSK0332</u> |
|---------------|----------------------|-------------|------------------------------|------------------------|----------------|
| Review Level: | NYSDEC 'DUSR' | Laboratory: | TestAmerica Buffalo | | |

A. HOLDING TIMES (NYSDEC-ASP)

 AQUEOUS MATRIX:
 10 DAYS MAX. FROM VTSR TO ANALYSIS, IF PRESERVED TO pH <2 & 4 DEGREES C</td>

 AQUEOUS MATRIX:
 7 DAYS MAX. FROM VTSR TO ANALYSIS, IF NOT PRESERVED TO pH <2 & 4 DEGREES C</td>

 NON-AQUEOUS MATRIX:
 10 DAYS MAX.IMUM FROM VTSR TO ANALYSIS, IF PRESERVED TO 4 +/- 2 DEGREES C

 NON-AQUEOUS MATRIX:
 10 DAYS MAXIMUM FROM VTSR TO ANALYSIS, IF PRESERVED TO 4 +/- 2 DEGREES C

 NON-AQUEOUS MATRIX:
 7 DAYS MAXIMUM FROM VTSR TO ANALYSIS, IF NOT PRESERVED TO 4 +/- 2 DEGREES C

 All aqueous samples were analyzed within 5 days of VTSR.

B. METHOD BLANKS

| Date Analyzed | Blank ID (-BLK1) | <u>File ID</u> | <u>Matrix</u> | Analytes Present |
|---------------|------------------|----------------|---------------|------------------|
| 11/10/09 | 9K10009 | N0574.D | water | none |

The associated Trip Blank sample was free of target analytes.

C. SURROGATE RECOVERY

Surrogate recoveries were within acceptable limits.

D. MATRIX SPIKE / DUPLICATE (MS/MSD)

No VOC MS/MSD samples were reported in this SDG.

E. BLANK SPIKE (LCS) 9K10009-BS1

Recoveries of all reported analytes were within limits in associated Blank Spike samples.

F. INTERNAL STANDARDS (IS)

IS recoveries & RTs for all SDG samples were within acceptable limits.

G. FIELD DUPLICATE PRECISION

No field duplicate samples were identified for this sampling event.

VOLATILE ORGANICS CALIBRATION SUMMARY SW-846, Method 8260

| Client: i | Malcolm Pirnie, Inc. | Project: Flexo Site R.I. : Seneca St. | Laboratory Job No.: <u>RSK0332</u> |
|------------------------------|----------------------|---------------------------------------|---------------------------------------|
| Review Level: | NYSDEC 'DUSR' | Laboratory: TestAmerica Buffalo | |
| A. INSTRUMENT PERFORMA | NCE (BFB TUNE) | <u>HP5973N</u> | |
| TUNE DATE: | 11/09/09 | 11/10/09 | |
| TUNE FILE: | N0533.D | N0570.D | |
| BFB INJECTION TIME: | 11:24 | 09:28 | |
| LAST SAMPLE INJECTION: | 14:07 | 19:52 | |
| m/z RATIOS ACCEPTABLE ? | Yes | Yes | |
| B. INITIAL CALIBRATION | | C. CONTINUING CALIBRATIONS | |
| CALIBRATION DATE : | 11/09/09 | CALIBRATION DATE : | 11/10/09 |
| FILE IDs : | N0535-40.D | FILE ID : | N0571.D |
| ALL target RRFs > 0.05 ? | Yes | ALL target RRFs > 0.05 ? | Yes |
| SPCC RRFs > min.values? | Yes | SPCC RRFs > min, values ? | Yes |
| CCC %RSDs < 30% ? | Yes | CCC %Ds < 20% ? | Yes |
| All Targets < 15% RSD? | No | Targets < 20%D or Drift ? | Yes |
| If No, regression r > 0.99 ? | Yes | (If No, list compounds)===> | |
| (If No, list compounds)===> | | · · · · · · · · · · · · · · · · · · · | |
| Associated samples: a | af) | Associated samples: | alt |
| QA ACTION : r | n/a | | |
| D. SAMPLE RESULT VERIFIC | ATION | | |
| SAMPLE ID : | RIB-4 | RSK0332-03 | |
| COMPOUND : | methylene chloride | Int. Std. : 1,4-difluorobenzene Aque | ous quantitation |
| REPORTED VALUE : | 1.2 JD | | Ax) (Is) (Df) |
| | | | s) (RRF) (Wo) |
| Ax | ls | Df | |
| 4123 | 125 | 2.0 | |
| 511903 | 0.329 | 5.0 | |
| Ais | RRF | Wo | |
| ug/L ≃[| 1.22 | Result verified ? Yes | |

SEMI-VOLATILE ORGANICS QC PARAMETER / QUALIFIER SUMMARY <u>SW846 8270</u>

Client: <u>Malcolm Pirnie, Inc.</u> Project: <u>Flexo Site R.I.</u>; <u>Seneca St.</u> Job No.: <u>RSK0332</u> Review Level: <u>NYSDEC 'DUSR'</u> Laboratory: <u>TestAmerica Buffalo</u>

A. HOLDING TIMES (NYSDEC-ASP)

| AQUEOUS MATRIX: | 5 DAYS MAX, VTSR TO EXTRACTION / 40 DAYS MAX, EXTRACTION TO ANALYSIS |
|---------------------|---|
| | SAMPLES AND EXTRACTS MUST BE MAINTAINED AT 4 +/- 2 DEGREES C |
| NON-AQUEOUS MATRIX: | 10 DAYS MAX. VTSR TO EXTRACTION / 40 DAYS MAX. EXTRACTION TO ANALYSIS |
| | SAMPLES AND EXTRACTS MUST BE MAINTAINED AT 4 +/- 2 DEGREES C |

All aqueous samples were extracted within 1 day of VTSR; all samples were analyzed within 5 days of extraction.

QA Action : n/a

B. METHOD BLANKS

| | Blank ID 905121-BLK1 | <u>File ID</u> V7294.D | Date Extracted 11/06/09 | <u>Matrix</u> water | Analytes Present | Conc., ppb n/a | Affected Samples all |
|----|-----------------------------|---------------------------|---|--------------------------|------------------------|-------------------|-------------------------|
| | 303121-DERT | ¥7204.D | 1 100/03 | water | none | 1.761 | ¢11 |
| C. | SURROGATE RECOVERY | | | | | | |
| | Sample ID | Surrogate ID | Recovery % | QA Action | | | |
| | RIB-4 (RSK0332-01) | nitrobenzene-d5 | - | n/a (only one out in one | e fraction; high rec.) | | |
| | RIB-4 (RSK0332-02) | nitrobenzene-d5 | 138 | | | | |
| ~ | | | | | | | |
| D. | MATRIX SPIKE / DUPLICATE (| MS/MSU] | | | | | |
| | No MS/MSD samples were repo | rted with this SDG. | | | | | |
| | | | | | | | |
| E. | BLANK SPIKE (LCS) | 905121-BS1; -BSD1 | l i i i i i i i i i i i i i i i i i i i | | | | |
| | Compound | Recovery % | QA Action | | | | |
| | 3,3'-dichlorobenzidine | 149, 158 / 140 | n/a; no positive | s found for this compou | und in SDG samples | | |
| | N-nitrosodiphenylamine | 131, 138 / 125 | n/a; no positive | s found for this compou | und in SDG samples | | |

F. INTERNAL STANDARDS (IS)

IS recoveries & RTs for all SDG samples were within acceptable limits.

G. FIELD DUPLICATE

No field duplicates were identified for this SDG.

SEMI-VOLATILE ORGANICS CALIBRATION SUMMARY SW846 METHOD 8270C

| | | SVV846 METHO | <u>JD 8270C</u> | | |
|----------------|---|--|------------------------------|------------------------|----------------|
| Client: | Malcolm Pirnie, Inc. | Project: | Flexo Site R.I. ; Seneca St. | Laboratory Job No.: | <u>RSK0332</u> |
| Review Level: | NYSDEC 'DUSR' | Laboratory: | TestAmerica Buffalo | | |
| А. | INSTRUMENT PERFORMAN | | | | |
| <i>.</i> | TUNE DATE: | | 11/11/09 | _ | |
| | TUNE FILE: | V7146.D | V7280.D | | |
| | DFTPP INJECTION TIME: | 10:40 | 09:34 | | |
| LAST INJECTION | WITHIN 12-HR, WINDOW ? | | Yes | | |
| | m/z RATIOS ACCEPTABLE ? | Yes | Yes | | |
| | | L | | | |
| В. | INITIAL CALIBRATION | | | | |
| | SPCC Compounds | CALIBRATION DATE : | 11/06/09 | | |
| | Base/Neutrals | FILE ID: | V7147-52; 55-60.D | | |
| | N-Nitroso-di-n-propylamine | All target RRFs >0.05 ? | Yes | | |
| | Hexachlorocyclopentadiene | All target %RSDs < 15% ? | No | | |
| | Acids | If No, Regression established? | Yes | | |
| | 2,4-Dinitrophenol | Correlation > 0.99 ? | Yes | | |
| | 4-Nitrophenol | (If No, list compounds) ==> | | | |
| | MINIMUM RRF = 0.050 | · · · | | | |
| | | QA ACTION: | <u>n/a</u> | | |
| | CCC Compounds Base/Neutrals Acenaphthene 1.4-Dichlorobenzene Hexachlorobutadiene Diphenylamine Di-n-octylphthalate Fluoranthene Benzo(a)pyrene Acids 4-Chloro-3-methylphenol 2.4-Dichlorophenol 2.Nitrophenol Phenol Pentachlorophenol 2.4.6-Trichlorophenol AXIMUM %RSD = 30.0% MAXIMUM %D = 20.0% | cceptable alternatives for compo be 0.99 minimum for these compo 0.99 minimum for these compou -pts. for third-order equations. | ounds. | | |
| C. | CONTINUING CALIBRATION | <u>S</u> | | | |
| | CALIBRATION DATE : | 11/11/09 | | | |
| | FILE ID: | V7281.D | | | |
| All | target & SPCC RRFs >0.05 ? | Yes | | | |
| | CCC %Ds < 20% ? | Yes | | | |
| | %D or 80 -120% True Value? | No | | | |
| | (If No, list compounds) ==> | 4-methylphenol -26% | | | |

QA Action : For targets w/ %D >-20% : Flag non-detects 'UJ' and positives 'J' in affected samples; negative bias on RL or positive value.

Affected samples : all samples

Page 1 of 1

PCB ANALYSIS QC PARAMETER / QUALIFIER SUMMARY <u>SW-846 Method 8082</u>

| | | 344-040 INE | | | | |
|----|---|--|------------------------|--|--------------------------|---------------------------------------|
| | Client: Malcolm Pirnie, Inc. | Project: <u>Fle</u> | exo Site R.I. ; S | Seneca St. | Laboratory Job No.: | |
| | Review Level: NYSDEC 'DUSR | Laboratory: <u>Te</u> | stAmerica Buf | falo | | |
| Α. | HOLDING TIMES (NYSDEC-ASP) | | | | | |
| | AQUEOUS MATRIX: | | | ON / 40 DAYS MAX. EXT BE MAINTAINED AT 4 +/ | | |
| | NON-AQUEOUS MATRIX: | | | TON / 40 DAYS MAX, EX BE MAINTAINED AT 4 +/ | | |
| | Aqueous samples were extracted within 1 | day of VTSR; samples we | ere analyzed w | vithin <u>1</u> day of extraction. | | |
| | QA Action : n/a | | | | | |
| B. | METHOD BLANKS Blank ID Date Extracted 9K05124-BLK1 11/06/09 | <u>Date Analyzed</u> 11/06/09 | <u>Matrix</u> water | Analytes Present none | <u>Conc., ppb</u> n/a | Associated <u>Samples</u> RIB-4 |
| C. | INSTRUMENT BLANKS | | | | | |
| | Injection logs indicated that instrument bla | anks were run following ea | ch CCV. | | | |
| D. | SURROGATE RECOVERY | | | | | |
| | Surrogate recoveries were within accepta | ble limits. | | | | |
| E. | MATRIX SPIKE / DUPLICATE (MS/MSD |) | | | | |
| | No MS/MSD were reported for this SDG. | | | | | |
| F. | <u>BLANK SPIKE (LCS)</u> <u>Aroclor Recovery</u> AR 1016 59 / 61% | 9K05124-BS1 <u>QA Action</u> Flag AR1016 as estima | ated, 'UJ', with | low bias on RL indicated | | |
| G, | SAMPLE QUALITATIVE & QUANTITATIV | E VERIFICATION | | | | |
| | No positive results for target Aroclors wer | e reported in field samples | | | | |
| н. | FIELD DUPLICATE PRECISION | | | | | |

No Field Duplicates were identified for this SDG.

PCB ANALYSIS CALIBRATION SUMMARY <u>SW-846 Method 8082</u>

Client: Malcolm Pimie, Inc.

Project: Flexo Site R.I.; Seneca St.

Laboratory Job No.:

Review Level: <u>NYSDEC 'DUSR'</u> Laboratory: <u>TestAmerica Buffalo</u>

A. INITIAL CALIBRATION

1

| CALIBRATION DATE : | 10/11/09 | HP6890-7 |
|---------------------------|-------------|----------|
| FILE IDs : | 7a94146-152 | |
| Mean RSD <u><</u> 20%? | yes | |
| Lin Regression r>0.99 ? | yes | |
| 2nd-order COD >0.99 ? | n/a | |
| Associated samples : | RIB-4 | |
| | | |

B. CONTINUING CALIBRATIONS (CCV)

| | CCV1 | CCV2 |
|----------------------------|----------|----------|
| CALIBRATION DATE : | 11/07/09 | 11/07/09 |
| FILE IDs : | 7a97166 | 7a97174 |
| TIME : | 17:02 | 19:28 |
| At start of sequence? | Yes | n/a |
| After every 10 samples? | n/a | n/a |
| At end of sequence? | n/a | Yes |
| %D <u><</u> 15? | NO | NO |
| If No, list compounds ===> | AR1016 | AR1016 |
| | AR1260 | AR1260 |
| Affected Samples : | RIB-4 | |

QA ACTION: %D results were >15% for AR1016 &/or AR1260 for at least one quant. peak; responses were mixed (some high / some low) within a set of quant peaks for a particular Aroclor. Results for non-detects for both Aroclors were flagged 'UJ', as quantitatively estimated RL values.

Page 1 of 1

<u>R\$K0332</u>

INORGANICS / METALS ANALYSIS QC PARAMETER / CALIBRATION / QUALIFIER SUMMARY

| | Client: | Malcolm Pirnie, Inc. | Project: | Flexo Site R.I. ; Sene | ca St. | Laboratory Job No.: | RSK0332 |
|------------|----------------------|--|------------------|----------------------------------|-------------------|------------------------|---------------------------------|
| | Review Level: | NYSDEC 'DUSR' | · | | | Laboratory: | <u>TestAmerica Buffalo</u> |
| | | | | | | | |
| А. | CALIBRATION | | ICV | <u>CCV</u> | Outliers ? | | |
| | | ICP & AA Analytes | 90 -110% | 90 -1 10% | none | | |
| | | Mercury | 80 - 120% | 80 - 120% | none | | |
| | | Cyanide | 85 - 115% | 85 - 115% | none | | |
| | | Mercury | | dards, r ² >/ = 0.995 | none | | |
| | | Cyanide | Blank + 4 Stand | dards, r ² >/ = 0.995 | none | | |
| | ve | | | | | | |
| | | CRDL Standards | | % Recovery | <u>Outliers ?</u> | | QAACTION |
| | | ICP Analytes | CRI | 70 - 130% | ***** | +35% | Flag positive As estimated, 'J' |
| | | | 204 | 70 4000 | | +36% | n/a; TI 'U' in affected sample |
| | | Mercury | CRA | 70 - 130% | none | | |
| | | Cyanide | Mid-Range | 70 - 130% | n/a | | |
| в | BLANKS | | | | Outliers ? | | |
| υ. | DOWNO | ICB / CCB | < RL | | none | | |
| | | PrepBlank | < RL | | none | | |
| | | | | | | | |
| C. | ICP INTERELEM | ENT CORRECTION (I | CSA/ICSAB) | | Outliers ? | | |
| | | ICSA | <2x RL for RL < | <10 ug/L | none | | |
| | | ICSAB | 80 - 120% reco | very | none | | |
| | | | | | | | |
| D. | MATRIX SPIKE | | | | Outliers ? | Comments | |
| | | 75 - 125% recovery (if | sample conc. < | 4x spike conc.) | ſ | No MS / MSD r | eported for this SDG. |
| | | | | | | | |
| F. | POST-DIGESTIC | N SPIKE (PDS) | | | Outliers ? | Comments | |
| _ . | | [only required for non- | compliant matrix | c spike analytes] | | n/a; see above | Comments |
| | | 75 - 125% recovery; P | | | | | |
| | | 2x sample conc., whic | hever is >. | | | | |
| | | | | | | | |
| F. | MATRIX SPIKE D | DUPLICATE (OR MATE | RIX DUPLICATE | 3 | Outliers ? | Comments | |
| | | Max. 35% RPD for nor | • • | | 1 | No MS / MSD r | eported for this SDG. |
| | | Max. (+/-) CRQL value | if either sample | e < 5x CRDL | | | |
| _ | | | | | | | |
| G. | | ONTROL SAMPLE | | | <u>Outliers ?</u> | | |
| | • | 80 - 120% for aqueous | • | | none | | |
| | Recovery within s | pecified range for non- | aqueous sampi | es | | | |
| н | SERIAL DILUTIO | N SAMPLE | | | Outliers ? | Comments | |
| * 1. | Maximum 10.0% | | | | | | on reported for this SDG. |
| | undiluted sample | | | | I. | to ocitar Difuti | |
| | | | | | | | |
| I. | FIELD DUPLICAT | <u>re</u> | | | Outliers ? | Comments | |
| | Criteria: if both re | sults >5x MRL, <35%R | PD; | | | No Field Duplic | ates identified for this SDG. |
| | if either or both < | 5x MRL, delta <mrl< td=""><td></td><td></td><td></td><td></td><td></td></mrl<> | | | | | |
| | | | | | | | |

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INORGANICS / METALS ANALYSIS QC PARAMETER / CALIBRATION / QUALIFIER SUMMARY

| | Client: Malcolm Pirnie, | <u>Inc.</u> | Project: | Flexo Site R.I. ; Seneca St. | Laboratory Job No.: | <u>RSK0332</u> |
|----|---|--|----------|--|--|---------------------|
| Re | eview Level: NYSDEC 'DUS | <u>R'</u> | | | Laboratory: | TestAmerica Buffalo |
| J. | NYSDEC-ASP HOLDING T Metals except mercury Mercury Cyanide | IMES (from VTSR) 6 months 26 days 12 days | | All samples were analyzed within al | lowable holdin | g times. |
| K. | | ment Detection Limits prrection Factors | | <u>Frequency</u> every 6 months every 6 months every 6 months | Outliers? date not listed date not listed date not listed | - E |

February 18, 2010

Malcolm Pirnie, Inc. Att: Mr. James Richert 50 Fountain Plaza, Suite 600 Buffalo, New York 14202

Re: Flexo Remediation Investigation Site Data Deliverables; Laboratory No. RSJ1254

Malcolm Pirnie Project / Task Order No. : 6105-002

Dear Mr. Richert,

Enclosed with this cover letter are the results of our data review of the laboratory deliverables pertaining to the referenced site. The review was conducted according to the guidelines established by NYSDEC's Data Usability Summary Review ('DUSR') process; data flags (qualifiers) were assigned to samples based on guidance contained in EPA Region II's Inorganic and Organic data validation guidelines.

Site Name: Flexo Transparent R.I.; 1132 & 1146 Seneca Street Site, Buffalo, NY

Fractions: Volatile Organics Semi-volatile Organics Polychlorinated Biphenyls (PCBs) TAL Metals + Cyanide

Laboratory: TestAmerica Matrix: Non-Aqueous

Reviewer: Chris Taylor

Prepared By: Environmental Quality Associates, Inc.

<u>SECTION A</u>

Sample Information

The above-referenced analytical job numbers / samples were analyzed by TestAmerica Buffalo, Amherst, New York. Samples were analyzed for volatile organics (VOC, 2), semivolatile organics (SVOC, 4), polychlorinated biphenyls (PCB, 4), TAL metals and cyanide (TAL/CN, 3), in addition to any matrix spikes and duplicates for each analytical fraction.

Samples were collected on 10/19/2009, and were received at the laboratory (VTSR) on 10/22/2009 in good condition, at 6.0 degrees Centigrade, with ice noted as present.

SECTION B General Comments

Summary of data completeness and overall quality of data deliverables package

Data deliverables were complete as received.

Malcolm Pirnie, Inc. / Mr. James Richert

February 18, 2010

Overall data quality

Data quality was acceptable, incorporating applied data qualifiers as detailed in the accompanying QC and calibration summary forms, and discussed in the fraction-specific sections below.

SECTION C

Volatile Organic Fraction

Method blank 9J28038-BLK1 presented a low-level positive for methylene chloride resulting in the adjustment of methylene chloride results in samples RIB-2 (0.5-1.0) to 11 U ug/Kg and in sample RIB-5 (0.5-2.0) to 5.6 U ug/Kg.

No MS/MSD samples were reported for this sample group; no field duplicates were identified for this sample group.

Continuing calibration of 10/28/09 exhibited several compounds which presented %D values outside the (+/-) 20% acceptance range; these are detailed on the attached calibration summary. Compounds which required qualification due to these excursions were flagged on the associated EDD file with the appropriate annotation and bias direction.

Note to data user: in cases where %Ds were >+20.0%, with CCAL RRF values > corresponding ICAL average values (i.e., greater sensitivity), no QA action was taken if there were no positives found for these compounds in the associated field samples.

SECTION D

Semi-volatile Organics

All SDG samples, with the exception of RIB-5 (0.5-2.0), were analyzed and reported at extract dilutions ranging from 20x to 40x, resulting in corresponding increases in analyte RL values.

No MS/MSD samples were reported for this sample group; no field duplicates were identified for this sample group.

No data qualifications were required for these samples in this fraction.

SECTION E Polychlorinated Biphenyls (PCBs)

All SDG samples, with the exception of RIB-5 (0.5-2.0), were analyzed and reported at extract dilutions ranging from 10x to 500x, resulting in corresponding increases in analyte RL values.

Several samples presented inter-column precision results above 25%D for Aroclors 1248 and/or 1260. These results were flagged as quantitatively estimated 'J'. Results which exceeded 100%D inter-column, and exhibited acceptable pattern-match for Aroclor confirmation were flagged as 'NJ', to indicate presumptive presence at estimated quantitation value. These samples and Aroclors are detailed on the attached QC summary form.

Environmental Quality Associates, Inc.

Malcolm Pirnie, Inc. / Mr. James Richert

February 18, 2010

Page 3 of 3

No MS/MSD samples were reported for this sample group; no field duplicates were identified for this sample group.

Continuing calibration (CCV) response %D results exceeded -15% for Aroclor 1016 and Aroclor 1260 in the closing CCV on 10/27/09, affecting all SDG samples. Results for the noted Aroclors in affected samples were flagged 'UJ' or 'J', as estimated RL values or positive results, with negative bias indicated due to reduced calibration sensitivity in the calibration verifications.

SECTION G

Metals / Wet Chemistry

No MS/MSD samples were reported for this sample group; no field duplicates were identified for this sample group. No LCS or serial dilution sample were reported for this sample group. A standard reference material was reported for this SDG; recoveries were within acceptable limits.

QC parameters for total cyanide were within limits. No data qualifiers for cyanide were necessary.

SECTION H Overall Recommendations

The results of the review and qualification process for the above analytical fractions and associated samples are summarized on the attached QC and Calibration summary tables for each specific analytical fraction, in order to facilitate the end-user's' review of these data. Data qualifiers have been applied directly to the laboratory EDD spreadsheet (database), and are detailed in the corresponding QC / Calibration summaries.

Very truly yours, Environmental Quality Associates, Inc.

Chris W. Taylor Vice President

/cwt Attachments

Environmental Quality Associates, Inc.

VOLATILE ORGANICS QC PARAMETER / QUALIFIER SUMMARY <u>SW-846, Method 8260</u>

| Client: | Malcolm Pimie, Inc. | | Flexo Site R.I.; Seneca St. | Laboratory Job No.: | <u>RSJ1254</u> |
|---------------|---------------------|-------------|-----------------------------|------------------------|----------------|
| Review Level: | NYSDEC 'DUSR' | Laboratory: | TestAmerica Buffalo | | |

A. HOLDING TIMES (NYSDEC-ASP)

 AQUEOUS MATRIX:
 10 DAYS MAX. FROM VTSR TO ANALYSIS, IF PRESERVED TO pH <2 & 4 DEGREES C</td>

 AQUEOUS MATRIX:
 7 DAYS MAX. FROM VTSR TO ANALYSIS, IF NOT PRESERVED TO pH <2 & 4 DEGREES C</td>

 NON-AQUEOUS MATRIX:
 10 DAYS MAX.IMUM FROM VTSR TO ANALYSIS, IF PRESERVED TO 4 +/- 2 DEGREES C

 NON-AQUEOUS MATRIX:
 10 DAYS MAXIMUM FROM VTSR TO ANALYSIS, IF PRESERVED TO 4 +/- 2 DEGREES C

 NON-AQUEOUS MATRIX:
 7 DAYS MAXIMUM FROM VTSR TO ANALYSIS, IF NOT PRESERVED TO 4 +/- 2 DEGREES C

 All non-aqueous samples were analyzed within <u>6</u> days of VTSR.

B. METHOD BLANKS

| Date Analyzed 10/28/09 | <u>Blank ID (-BLK1)</u> 9J28038 | <u>File ID</u> F1326 | <u>Matrix</u> soil | Analytes Present cyclohexane methylene chloride | <u>Conc., ppb</u> 1.5 J 3.2 J | Affected Samples RIB-2 0.5-1.0 RIB-5 0.5-2.0 |
|---------------------------|------------------------------------|-------------------------|-----------------------|---|-------------------------------------|--|
| QA Action : | RIB-2 0.5-1.0 | MeCl2 lo 11 U | | | | |
| | RIB-5 0.5-2.0 | MeCl2 to 5.6 U | | | | |

C. SURROGATE RECOVERY

Surrogate recoveries were within acceptable limits.

D. MATRIX SPIKE / DUPLICATE (MS/MSD)

No VOC MS/MSD samples were reported in this SDG.

E. BLANK SPIKE (LCS) 9J28038-BS1

Recoveries of all reported analytes were within limits in associated Blank Spike samples.

F. INTERNAL STANDARDS (IS)

IS recoveries & RTs for all SDG samples were within acceptable limits.

G. FIELD DUPLICATE PRECISION

No VOC Field Duplicates were identified for this SDG.

Page 1 of 1

VOLATILE ORGANICS CALIBRATION SUMMARY SW-846, Method 8260

| Client: | Malcolm Pirnie, Inc. | Project: | Flexo Site R.I. ; Seneca St | Laboratory Job No.: <u>RSJ1254</u> |
|------------------------------|-------------------------|-----------------------------------|--------------------------------|---------------------------------------|
| Review Level: | NYSDEC 'DUSR' | Laboratory: | TestAmerica Buffalo | |
| A. INSTRUMENT PERFORM | ANCE (BFB TUNE) | HP5973F | | |
| TUNE DATE: | 10/17/09 | 10/28/09 | | |
| TUNE FILE: | F1001.D | F1321.D | | |
| BFB INJECTION TIME: | 12:28 | 12:04 | | |
| LAST SAMPLE INJECTION: | 16:38 | 23:00 | | |
| m/z RATIOS ACCEPTABLE ? | Yes | Yes | | |
| B. INITIAL CALIBRATION | | C. | CONTINUING CALIBRATI | ONS |
| CALIBRATION DATE : | 10/17/09 | 7 | CALIBRATION DATE : | 10/28/09 |
| FILE IDs : | F1003-04;06-07;11.D | | FILE ID : | F1323.D |
| ALL target RRFs > 0.05 ? | Yes | | ALL target RRFs > 0.05 ? | Yes |
| SPCC RRFs > min.values? | Yes | S | PCC RRFs > min. values ? | Yes |
| CCC %RSDs < 30% ? | Yes | | CCC %Ds < 20% ? | Yes |
| All Targets < 15% RSD? | Yes | | Targets < 20%D or Drift ? | NO |
| If No, regression r > 0.99 ? | n/a | 4 | If No, list compounds)===> | 112-triCl-122-InF-ethane +33% |
| (If No, list compounds)===> | | | | 12-diBr-3-CI-propane -30% |
| Associated samples: | ali | _ | | bromoform -20.3% |
| | | | | chloroethane +28% |
| | | | | methyl acetate -29% |
| | | | | triCl-F-melhane +21% |
| 04.407:01 | A | | Associated samples: | all |
| QA ACTION : | Comportings w/ %D >-20% | - (-) ; flag as estimated ('UJ' o | or "J") w/ negative bias on RI | L or reported positive result. |

Compounds w/ %D >+20% (+); flag as estimated ('J') w/ positive bias on reported positive result.

D. SAMPLE RESULT VERIFICATION

| SAMPLE ID : | LCS | 9J28038-BS1 | | | |
|------------------|-----------------|-------------|-------------|---------------------|-------------------------|
| COMPOUND : | trichloroethene | | Int. Std. : | 1,4-difluorobenzene | Non-Aqueous (low-level) |
| REPORTED VALUE : | 50.9 | ug/Kg | | | (Ax) (Is) (Df) |
| | | | | | (Ais) (RRF) (Ws) (D) |
| Ax | ls | Df | | | |
| 164959 | 250 | 1.0 | | | 1 |
| 599953 | 0.270 | 5.00 | | 1.000 | |
| Ais | RRF | Ws | | D | |
| | | | | | |
| ug/Kg = | 50.9 | Resul | t verified? | Yes | |
| | | | • | | |

SEMI-VOLATILE ORGANICS QC PARAMETER / QUALIFIER SUMMARY SW846 8270

Project: Flexo Site R.t.; Seneca St.

| | Review Level: | NYSDEC 'DUSR | Laboratory: Test | America Buffalo | | | | | |
|----|---|---------------------------|----------------------------|-----------------------|--|----------------------------|---------------------------|--|--|
| Α. | HOLDING TIMES (NYSDEC-ASP) | | | | | | | | |
| | AQUEDUS MATRIX: | | | | ION / 40 DAYS MAX. EX BE MAINTAINED AT 4 + | | | | |
| | NON-AQUEOUS MATRIX: | | | | TION / 40 DAYS MAX. EX BE MAINTAINED AT 4 + | | | | |
| | All non-aqueous samples were extra | acted within <u>4</u> da | ys of VTSR; all sample | es were analyzed | within 3 days of extraction | on. | | | |
| | QA Action : n/ | a | | | | | | | |
| 8. | METHOD BLANKS Blank ID 9J25023-BLK1 | <u>File ID</u> W8190.0 | Date Extracted 10/26/09 | <u>Matrix</u> soil | Analytes Present 2-Me naphthalene | <u>Сопс., ppb</u> 6.8 J | Affected Batch 9J25023 | | |
| | 9323023-6LKT | M01907D | 10/26/09 | SOI | z-we_naphthalene | 6.6 J 25 J | 9323023 | | |
| | QA Action: No | o action taken, si | nce any positives in as | sociated sample | es were above 5x Blank A | ction Levels. | | | |
| C. | SURROGATE RECOVERY | | | | | | | | |
| | Surrogate recoveries were within acceptable limits, with the exception noted below; no QA action was necessary. Note: no recovery of surrogate 2,4,6-triBrphenol was found; this sample was analyzed at 20x extract dilution | | | | | | | | |
| D. | MATRIX SPIKE / DUPLICATE (MS | /MSD) | | | | | | | |
| | No MS/MSD samples were reported | with this SDG. | | | | | | | |
| E. | BLANK SPIKE (LCS) | 9J25023-BS1 Recovery % | DV Elao | Bias | Samples Affected | | | | |

| Compound | Recovery % | DV Flag | Bias | Samples Affected |
|------------------------|------------|---------|------|--------------------------------|
| 3,3'-dichlorobenzidine | 129 / 126 | none | n/a | none; no positives present for |
| N-nitrosodiphenylamine | 12t / 119% | none | n/a | affected compounds |

F. INTERNAL STANDARDS (IS)

IS recoveries & RTs for all SDG samples were within acceptable limits.

Client: Malcolm Pirnie, Inc.

G. FIELD DUPLICATE

No Field Duplicate samples were identified for this SDG.

1 of 1

Laboratory

Job No.:

<u>RSJ1254</u>

SEMI-VOLATILE ORGANICS CALIBRATION SUMMARY <u>SW846 METHOD 8270C</u>

| | | <u>SW846 METH0</u> | <u>DD 8270C</u> | | |
|---------------------|---|---------------------------------|--|-------------------------|----------------|
| Client: | Malcolm Pirnie, Inc. | Project: | Flexo Site R.I. ; Seneca St. | Laboratory Job No.: | <u>RSJ1254</u> |
| Review Level: | NYSDEC 'DUSR' | Laboratory: | TestAmerica Buffalo | | |
| А. | INSTRUMENT PERFORMAN | | | | |
| 7.4 | TUNE DATE: | | 10/29/09 | 1 | |
| | TUNE FILE: | W8153.D | W8221.D | | |
| | DFTPP INJECTION TIME: | | 10:12 | | |
| LAST INJECTION | WITHIN 12-HR, WINDOW ? | | Yes | | |
| | m/z RATIOS ACCEPTABLE ? | Yes | Yes | | |
| | | | ······································ | - | |
| В. | INITIAL CALIBRATION | _ | | | |
| | SPCC Compounds | CALIBRATION DATE : | 10/27/09 | | |
| | Base/Neutrals | FILE ID: | W8155-60; 63-68.D | | |
| | N-Nitroso-di-n-propylamine | All target RRFs >0.05 ? | Yes | 7 | |
| | Hexachlorocyclopentadiene | All target %RSDs < 15% ? | No | | |
| | Acids | If No, Regression established? | Yes | | |
| | 2,4-Dinitrophenol | Correlation > 0.99 ? | Yes | | |
| | 4-Nitrophenol | (If No, list compounds) ==> | | | |
| : | MINIMUM RRF = 0.050 | | | | |
| | | QA ACTION: | <u>n/a</u> | | |
| | CCC Compounds | | | | |
| | Base/Neutrals | | | | |
| | Acenaphthene | | | | |
| | 1,4-Dichlorobenzene | | | | |
| | Hexachlorobutadiene | | | | |
| | Diphenylamine | NOTE: | | | |
| | Di-n-octylphthalate | | cceptable alternatives for compou | | |
| | Fluoranthene | | be 0.99 minimum for these compo | | |
| | Benzo(a)pyrene | | 0.99 minimum for these compound | is, with minimum 6-pts. | |
| | Acids | for second-order, and minimum 7 | -pts. for third-order equations. | | |
| | 4-Chloro-3-methylphenol 2,4-Dichlorophenol | | | | |
| | 2-Nitrophenol | | | | |
| | Phenol | | | | |
| | Pentachlorophenol | | | | |
| | 2,4,6-Trichlorophenol | | | | |
| | MAXIMUM %RSD = 30.0% | | | | |
| | MAXIMUM %D = 20.0% | | | | |
| | | | | | |
| C. | CONTINUING CALIBRATION | <u>s</u> | | | |
| | CALIBRATION DATE : | 10/29/09 | 1 | | |
| | FILE ID: | W8222.23 | | | |
| | All target & SPCC RRFs >0.0 | Yes | | | |
| | CCC %Ds < 20% ? | Yes | | | |
| All targets +/- 20º | %D or 80 -120% True Value? | Yes | | | |
| | (If No, list compounds) ==> | | | | |
| | , _, | | | | |

QA Action : n/a

Affected samples : all field samples

SEMI-VOLATILE ORGANICS CALIBRATION SUMMARY <u>SW846 METHOD 8270C</u>

| CLIENT: PROJECT: | <u>Malcolm Pirnie, Inc.</u> Flexo Site R.I. ; Seneca St. | | Lab Job No.: | <u>RSJ1254</u> | |
|---------------------|---|--------------|----------------------------|-------------------------|---------------|
| Review Level: | NYSDEC 'DUSR' | | Laboratory : | TestAmerica Buffalo | |
| SAMPLE RESULT VE | RIFICATION | | | | |
| SAMPLE ID: | RIB-5 0.5-2.0 | (RSJ1254-04) | | | |
| COMPOUND: | naphthalene | . , | Int. Std.: | naphthalene-d8 | |
| REPORTED VALUE: | 540 | ug/Kg | | | |
| ۱ | Ax | ls | Vt | Df | GPC |
| ug/Kg = | 210152 | 40 | 1000 | t | 1.0 |
| | 551253 | t.t30 | 1.0 | 30.23 | 0.840 |
| • | Ais | RRF | Vi | Ws | D |
| | | _ | | | |
| ug/Kg = | 531 | | Result verified ? | Yes | OK - rounding |
| Where : | Ax | = | area of quant ion for targ | et compound | |
| | ls | = | amount of internal stands | | |
| | Vt | = | volume of extract concer | | |
| | Df | = | Extract dilution factor | | |
| | GPC | = | GPC factor (1.0 for no cl | eanup; 2.0 for GPC clea | nup) |
| | Ais | = | area of quant ion for inte | rnal standard | |
| | RRF | = | relative response factor, | average from ICAL | |
| | Vi | = | extract volume injected, | | |
| | Ws | = | sample mass extracted, | gm (wet) | |
| | D | = | % Solids / 100 | | |
| | | | | | |

Page 2 of 2

D.

PCB ANALYSIS QC PARAMETER / QUALIFIER SUMMARY SW-846 Method 8082

| | | <u>011 010</u> | Method 8082 | | | |
|---|---|--|--|--|--|----------------|
| Client: | Malcolm Pirnie, Inc. | Project: | Flexo Site R.I. ; Sene | ca St. | Laboratory Job No.: | <u>RSJ1254</u> |
| Review Level: | NYSDEC 'DUSR' | Laboratory: | TestAmerica Buffalo | | | |
| HOLDING TIMES (N | IYSDEC-ASP) | | | | | |
| AQUEOUS MATRIX: | | | SR TO EXTRACTION / XTRACTS MUST BE N | | | YSIS |
| NON-AQUEOUS MA | TRIX: | | SR TO EXTRACTION XTRACTS MUST BE N | | | LYSIS |
| Non-aqueous sample | s were extracted within | n <u>1</u> day of VTSR; sa | mples were analyzed w | vithin <u>4</u> days of extra | ction. | |
| QA Action : | n/a | | | | | |
| METHOD BLANKS | | | | | _ | |
| <u>Blank ID</u> 9J22124-BLK1 | Date Extracted 10/23/09 | Date Analyzed 10/26/09 | <u>Matrix</u> soil | Analytes Present none | <u>Conc., ppb</u> n/a | |
| QA Action : | n/a | | | | | |
| INSTRUMENT BLAN | KS | | | | | |
| injection logs indicate | d that instrument blan | ks were run following | g each CCV. | | | |
| SURROGATE RECO | | | | | | |
| Sample ID | Surrogate | Recovery / Bias | QA Action | | · · · · · · · · · · · · · · · · · · · | |
| | TCMX & DCBP TCMX & DCBP | no recovery no recovery | n/a; samples were run target analytes. Surro | | | |
| | | norecovery | Tranger analytes, ouno | gales were unuleu c | ut. | |
| | TCMX & DCBP | no recovery | | - | | |
| RIB-3 0.6-0.9 | | no recovery | | - | | |
| RIB-3 0.6-0.9 MATRIX SPIKE / DUF | PLICATE | no recovery | <u> </u> | | | |
| RIB-3 0.6-0.9 MATRIX SPIKE / DUF No MS/MSD were rep | PLICATE | • | 9J22124-BS1 | 9J22124-BSD1 | | |
| RIB-3 0.6-0.9 MATRIX SPIKE / DUF No MS/MSD were rep BLANK SPIKE / BLAN | PLICATE | E (LCS / LCSD) | 9J22124-BS1 | | | |
| RIB-3 0.6-0.9 MATRIX SPIKE / DUF No MS/MSD were rep BLANK SPIKE / BLAN | PLICATE ported for this SDG. VK SPIKE DUPLICATE as and precision value | E (LCS / LCSD) | 9J22124-BS1 | | | |
| RIB-3 0.6-0.9 MATRIX SPIKE / DUF No MS/MSD were rep BLANK SPIKE / BLAN LCS / LCSD recoverie SAMPLE QUALITATI | PLICATE ported for this SDG. VK SPIKE DUPLICATE as and precision value VE VERIFICATION | E (LCS / LCSD) s were within limits. | | 9J22124-BSD1 | ere qualified as indica | ated. |
| RIB-3 0.6-0.9 MATRIX SPIKE / DUF No MS/MSD were rep BLANK SPIKE / BLAN LCS / LCSD recoverie SAMPLE QUALITATI The following samples Sample ID (RIB-) | PLICATE ported for this SDG. <u>VK SPIKE DUPLICATE</u> as and precision value <u>VE VERIFICATION</u> s exhibited inter-colum <u>Aroclor (AR-)</u> | E (LCS / LCSD) s were within limits. in concentrations wh <u>% Diffference</u> | ich exceeded 25% diffe QA Action | 9J22124-BSD1 erence (%D), and w | | ated. |
| RIB-3 0.6-0.9 MATRIX SPIKE / DUF No MS/MSD were rep BLANK SPIKE / BLAN LCS / LCSD recoverie SAMPLE QUALITATI The following samples Sample ID (RIB-) 2 0.5-1.0 | PLICATE ported for this SDG. VK SPIKE DUPLICATE as and precision value VE VERIFICATION s exhibited inter-colum Aroclor (AR-) 1248 | E (LCS / LCSD) s were within limits. In concentrations wh <u>% Diffference</u> 52 | ich exceeded 25% diffe <u>QA Action</u> Flag reported result 'J | 9J22124-BSD1 erence (%D), and w | stimated value | ated. |
| RIB-3 0.6-0.9 MATRIX SPIKE / DUF No MS/MSD were rep BLANK SPIKE / BLAN LCS / LCSD recoverie SAMPLE QUALITATI The following samples Sample ID (RIB-) | PLICATE ported for this SDG. <u>VK SPIKE DUPLICATE</u> as and precision value <u>VE VERIFICATION</u> s exhibited inter-colum <u>Aroclor (AR-)</u> | E (LCS / LCSD) s were within limits. in concentrations wh <u>% Diffference</u> | ich exceeded 25% diffe QA Action | 9J22124-BSD1 erence (%D), and w | stimated value | aled. |
| RIB-3 0.6-0.9 MATRIX SPIKE / DUF No MS/MSD were rep BLANK SPIKE / BLAN LCS / LCSD recoverie SAMPLE QUALITATI' The following samples Sample ID (RIB-) 2 0.5-1.0 | PLICATE ported for this SDG. VK SPIKE DUPLICATE as and precision value VE VERIFICATION s exhibited inter-colum Aroclor (AR-) 1248 | E (LCS / LCSD) s were within limits. In concentrations wh <u>% Diffference</u> 52 | ich exceeded 25% diffe <u>QA Action</u> Flag reported result 'J Flag reported result 'N | 9J22124-BSD1 erence (%D), and w ', as quantitatively e IJ', as quantitatively | stimated value estimated value | ated. |
| RIB-3 0.6-0.9 MATRIX SPIKE / DUF No MS/MSD were rep BLANK SPIKE / BLAN LCS / LCSD recoverie SAMPLE QUALITATI' The following samples Sample ID (RIB-) 2 0.5-1.0 | PLICATE ported for this SDG. <u>VK SPIKE DUPLICATE</u> as and precision value <u>VE VERIFICATION</u> s exhibited inter-colum <u>Aroclor (AR-)</u> 1248 1260 | E (LCS / LCSD) s were within limits. In concentrations wh <u>% Diffference</u> 52 135 | ich exceeded 25% diffe <u>QA Action</u> Flag reported result 'J | 9J22124-BSD1 erence (%D), and w ', as quantitatively e U', as quantitatively ', as quantitatively | stimated value estimated value stimated value | aled. |
| RIB-3 0.6-0.9 MATRIX SPIKE / DUF No MS/MSD were rep BLANK SPIKE / BLAN LCS / LCSD recoverie SAMPLE QUALITATI' The following samples Sample ID (RIB-) 2 0.5-1.0 2 0.0-2 | PLICATE ported for this SDG. <u>VK SPIKE DUPLICATE</u> as and precision value <u>VE VERIFICATION</u> s exhibited inter-colum <u>Aroclor (AR-)</u> 1248 1260 | E (LCS / LCSD) s were within limits. in concentrations wh <u>% Diffference</u> 52 135 64 | ich exceeded 25% diffe QA Action Flag reported result 'J Flag reported result 'N Flag reported result 'J | 9J22124-BSD1 erence (%D), and w ', as quantitatively e U', as quantitatively ', as quantitatively U', as quantitatively | stimated value estimated value stimated value estimated value | aled. |

H. FIELD DUPLICATE PRECISION

No Field Duplicates were identified for this SDG.

Α.

в.

C.

D.

Ε.

F.

G,

PCB ANALYSIS CALIBRATION SUMMARY SW-846 Method 8082

Project: Flexo Site R.I.; Seneca S1.

Laboratory Job No.: RSJ1254

Review Level: <u>NYSDEC 'DUSR'</u> Laboratory: <u>TestAmerica Buffalo</u>

A. INITIAL CALIBRATION

| CALIBRATION DATE : | 11/09/08 | HP5890-19 |
|----------------------------|---------------|-----------|
| FILE IDs : | 19a49175-181 | |
| Mean RSD <u><</u> 20%?. | yes | |
| Lin Regression r>0.99 ? | n/a | |
| 2nd-order COD >0.99 ? | n/a | |
| Associated samples : | RSJ1254-01-04 | |

Clien1: Malcolm Pirnie, Inc.

B. CONTINUING CALIBRATIONS (CCV)

| | ссуз | CCV4 |
|----------------------------|---------------|-------------|
| CALIBRATION DATE : | 10/26/09 | 10/27/09 |
| FILE IDs : | 19a049 | 19a055 |
| TIME : | 22:57 | 00:55 |
| At start of sequence? | Yes | n/a |
| After every 10 samples? | n/a | n/a |
| At end of sequence? | n/a | Yes |
| %D ≤ 15? | NÖ | Yes |
| If No, list compounds ===> | AR1260 +18% | AR1016 -20% |
| | | AR1260 -17% |
| Affected Samples : | RSJ1254-01-04 | |

QA ACTION: %D results were >15% for AR1016 &/or AR1260 for at least one quant. peak; since responses were negative with respect to ICAL average (i.e., reduced sensitivity) reported results for AR1016 and AR1260 were flagged as quantitatively estimated, 'U J' or 'J', with low bias indicated.

C. SAMPLE RESULT VERIFICATION

| Sample ID | Analyle | Reported Result | <u>Column 1</u> |
|------------------|---------|-----------------|---------------------------|
| RIB-3 0.6-0.9 | AR1260 | 6400 ug/Kg | peak al RT = 5.22 minules |
| File ID = 19a053 | | | |

Primary column

| | peak response | final volume, uL | dilution factor | |
|---------|---------------|-------------------|-----------------|---------|
| ug/Kg = | 17345 | 10000 | 100.0 | ug/Kg = |
| | 128677 | 30.37 | 0.6917 | |
| | CalFactor | sample wet weight | %solids/100 | |

Result verified ? yes OK - rounding

6417

INORGANICS / METALS ANALYSIS QC PARAMETER / CALIBRATION / QUALIFIER SUMMARY

| | Client: Review Level: | <u>Malcolm Pirnie, Inc.</u> <u>NYSDEC 'DUSR'</u> | Project: | Flexo Site R.I. : Sene | eca St. | Laboratory Job No.: Laboratory: | <u>RSJ1054</u> <u>TestAmerica Buffalo</u> |
|----|---|---|--|---|---|---------------------------------------|--|
| A. | CALIBRATION | • | | $\frac{CCV}{90 - 110\%}$ 80 - 120% 85 - 115% dards, r ² >/ = 0.995 dards, r ² >/ = 0.995 | Outliers? none none none none none | | |
| | | <u>CRDL Standards</u> ICP Analytes Mercury Cyanide | CRI CRA Mid-Range | <u>% Recovery</u> 70 - 130% 70 - 130% 70 - 130% | Outliers? Na none n/a | +34% | QA ACTION Flag pos. Na <2x RL estimated 'J' |
| В. | | | < RL < RL | | <u>Outliers ?</u> none none | | |
| C. | ICP INTERELEM | | <u>CSA / ICSAB)</u> <2x RL for RL < 80 - 120% reco | • | <u>Outliers ?</u> none none | | |
| D. | MATRIX SPIKE | S/MSD were reported | with this SDG. | Standard Reference I | Material recoverie | s were within | acceptable limits. |
| E. | | N SPIKE (PDS) [only required for non- 75 - 125% recovery; P 2x sample conc., which | DS conc. shou | | <u>See D. abov</u> | <u>/e.</u> | |
| F. | | DUPLICATE (OR MATE Max. 35% RPD for nor Max. (+/-) CRQL value | 1-aqueous sam | ples > 5x CRDL | <u>See D. abov</u> | <u>/e.</u> | |
| G. | | ONTROL SAMPLE ange for non-aqueous | samples | | <u>Comments</u> SRM was re | ported; no LC | CS reported |
| H. | SERIAL DILUTIO Maximum 10.0% undiluted sample | D if | | | <u>Comments</u> No serial dilu | ution sample | was reported |
| I. | | <u>IE</u> sults >5x MRL, <35%R 5x MRL, delta <mrl< td=""><td>PD;</td><td></td><td><u>Comments</u> No Field Duj</td><td>plicates were</td><td>reported</td></mrl<> | PD; | | <u>Comments</u> No Field Duj | plicates were | reported |

INORGANICS / METALS ANALYSIS QC PARAMETER / CALIBRATION / QUALIFIER SUMMARY

| | Client | Malcolm Pirnie, | Inc | Project: | Flexo Site R.I. ; S | ianaca St | Laboratory Job No.: | RSJ1054 |
|----|------------------|--|---|-------------------------------------|--|----------------------------|---|---------------------|
| | onem. | Malcontri ume. | <u>110.</u> | r toject. | TIEAU GRE TUT. , O | eneca or. | 300 NO | <u>K051004</u> |
| Re | eview Level: | NYSDEC 'DUSF | <u>۲'</u> | | | | Laboratory: | TestAmerica Buffalo |
| J. | - | <u>SP HOLDING TI</u> ept mercury | MES (from VTSR) 6 months 26 days 12 days | | All samples were | analyzed within all | lowable holding | g times. |
| К. | VERIFICAT | | | | <u>Frequency</u> every 6 months every 6 months every 6 months | | Outliers ? date not listed date not listed date not listed | 1 |
| L. | <u>VERIFICAT</u> | | , [| final | Sample ID : | RIB-2 0.0-2 81.5 | Analyte: _mg/Kg | РЬ |
| | mg/Kg = | conc. mg/L 0.6677 0.501 wet wgt, gm | | ume, mL 50 0.818 olids/100 | = mg/Kg = | 81.52 Result verified ? | Yes | |
| | VERIFICAT | ION OF REPOR | | Rep | Sample ID : | RIB-2 0.0-2 0.113 | Analyte: mg/Kg | Hg |
| | mg/Kg = | conc. mg/L 0.0011 0.594 wet wgt, gm | | ume, mL 50 0.818 blids/100 | = mg/Kg = | 0.113 Result verified ? |] Yes | |
| | | | | | | | | |

February 18, 2010

Malcolm Pirnie, Inc. Att: Mr. James Richert 50 Fountain Plaza, Suite 600 Buffalo, New York 14202

Re: Flexo Remediation Investigation Site Data Deliverables; Laboratory No. RSL0710

Malcolm Pirnie Project / Task Order No. : 6105-002

Dear Mr. Richert,

Enclosed with this cover letter are the results of our data review of the laboratory deliverables pertaining to the referenced site. The review was conducted according to the guidelines established by NYSDEC's Data Usability Summary Review ('DUSR') process; data flags (qualifiers) were assigned to samples based on guidance contained in EPA Region II's Inorganic and Organic data validation guidelines.

Site Name: Flexo Transparent R.I.; 1132 & 1146 Seneca Street Site, Buffalo, NY

Fractions: Volatile Organics Semi-volatile Organics Polychlorinated Biphenyls (PCBs)

Laboratory: TestAmerica Matrix: Non-Aqueous

Reviewer: Chris Taylor

Prepared By: Environmental Quality Associates, Inc.

<u>SECTION A</u>

Sample Information

The above-referenced analytical job numbers / samples were analyzed by TestAmerica Buffalo, Amherst, New York. Samples were analyzed for volatile organics (VOC, 1), semivolatile organics (SVOC, 1), and polychlorinated biphenyls (PCB, 37), in addition to any matrix spikes and duplicates for each analytical fraction.

Samples were collected between 12/14-16/2009, and were received at the laboratory (VTSR) on 12/16/2009 in good condition, at 6.0 degrees Centigrade, with ice noted as present.

SECTION B General Comments

Summary of data completeness and overall quality of data deliverables package

Data deliverables were complete as received.

Malcolm Pirnie, Inc. / Mr. James Richert

Overall data quality

Data quality was acceptable, incorporating applied data qualifiers as detailed in the accompanying QC and calibration summary forms, and discussed in the fraction-specific sections below.

SECTION C Volatile Organic Fraction

No VOC MS/MSD samples were reported for this sample group; no VOC field duplicates were identified for this sample group.

No data qualifications were required for these samples in this fraction.

SECTION D Semi-volatile Organics

No SVOC MS/MSD samples were reported for this sample group; no SVOC field duplicates were identified for this sample group.

The CCV on 12/18/09 presented %D for 4-methylphenol above -20%; the result for 4-methylphenol in associated sample E4 (0.8-1.1) was flagged as estimated, 'UJ', with low bias of RL value indicated.

<u>SECTION E</u>

Polychlorinated Biphenyls (PCBs)

All SDG samples, with the exception of A-L, were analyzed and reported at extract dilutions ranging from 4x to 10,000x, resulting in corresponding increases in analyte RL values.

Numerous samples presented inter-column precision results above 25%D for Aroclors 1242, 1248, 1254 and/or 1260. These results were flagged as quantitatively estimated 'J'. Results which exceeded 100%D inter-column, and exhibited acceptable pattern-match for Aroclor confirmation were flagged as 'NJ', to indicate presumptive presence at estimated quantitation value. These samples and Aroclors are detailed on the attached QC summary.

Continuing calibration (CCV) response %D results exceeded +15% for Aroclor 1260 in the analytical sequence of 12/18-19/09 (CCV 1-4), affecting all SDG samples with prefix P, O, N, M, L, K, H, G, C and D, and samples DUP-L and F-U. Results for positive Aroclor 1260 in affected samples were flagged 'J', as estimated positive results, with high bias indicated due to increased calibration sensitivity in the calibration verifications.

Continuing calibration (CCV) response %D results exceeded +15% for Aroclor 1016 in the analytical sequence of 12/20/09 (CCV 2-3), affecting all SDG samples with prefix J, B, A, E, and I, and samples E-4, LD-W and LD-S. Results for positive Aroclor 1016 in affected samples were flagged 'J', as estimated positive results, with high bias indicated due to increased calibration sensitivity in the calibration verifications.

Precision values between collocated samples L-U and DUP-U for Aroclor 1254, Aroclor 1260, and Total Aroclors exceeded 50% RPD (at 98%, 105% and 99%, respectively. Reported results for these analytes in both noted samples were flagged as estimated, 'J', with indeterminate bias direction.

Environmental Quality Associates, Inc.

Malcolm Pirnie, Inc. / Mr. James Richert

February 18, 2010

<u>SECTION G</u> <u>Metals / Wet Chemistry</u>

No metals or wet chemistry samples were analyzed for this sample group.

<u>SECTION H</u> Overall Recommendations

The results of the review and qualification process for the above analytical fractions and associated samples are summarized on the attached QC and Calibration summary tables for each specific analytical fraction, in order to facilitate the end-user's' review of these data. Data qualifiers have been applied directly to the laboratory EDD spreadsheet (database), and are detailed in the corresponding QC / Calibration summaries.

Very truly yours, Environmental Quality Associates, Inc.

Chris W. Taylor Vice President

/cwt Attachments

Environmental Quality Associates, Inc.

Page 3 of 3

VOLATILE ORGANICS QC PARAMETER / QUALIFIER SUMMARY SW-846, Method 8260

| Client: | <u>Malcolm Pirnie, Inc.</u> | | Flexo Site R.I. : Seneca St. | Laboratory Job No.: | <u>RSL0710</u> |
|---------------|-----------------------------|---------------|------------------------------|------------------------|----------------|
| Review Level: | NYSDEC 'DUSR' | Laboratory: 1 | TestAmerica Buffalo | | |

A. HOLDING TIMES (NYSDEC-ASP)

 AQUEOUS MATRIX:
 10 DAYS MAX. FROM VTSR TO ANALYSIS, IF PRESERVED TO pH <2 & 4 DEGREES C</td>

 AQUEOUS MATRIX:
 7 DAYS MAX. FROM VTSR TO ANALYSIS, IF NOT PRESERVED TO pH <2 & 4 DEGREES C</td>

 NON-AQUEOUS MATRIX:
 10 DAYS MAXIMUM FROM VTSR TO ANALYSIS, IF PRESERVED TO 4 +/- 2 DEGREES C

 NON-AQUEOUS MATRIX:
 10 DAYS MAXIMUM FROM VTSR TO ANALYSIS, IF PRESERVED TO 4 +/- 2 DEGREES C

 NON-AQUEOUS MATRIX:
 7 DAYS MAXIMUM FROM VTSR TO ANALYSIS, IF NOT PRESERVED TO 4 +/- 2 DEGREES C

 All non-aqueous samples were analyzed within 1 day of VTSR.

B. METHOD BLANKS

| Date Analyzed | Blank ID (-BLK1) | File ID | <u>Matrix</u> | Analytes Present |
|---------------|------------------|---------|---------------|------------------|
| 12/17/09 | 9L17082 | F2355 | soil | none |
| | | | | |

C. SURROGATE RECOVERY

All surrogate recoveries were within acceptable limits.

D. MATRIX SPIKE / DUPLICATE (MS/MSD)

No VOC MS/MSD samples were reported for this SDG.

E. BLANK SPIKE (LCS) 9L17082-BS1

Recoveries of all reported analytes were within limits in associated Blank Spike samples. Note: only the CLP-suite of five target compounds were spiked in the LCS.

F. INTERNAL STANDARDS (IS)

All IS recoveries & RTs samples were within acceptable limits.

G. FIELD DUPLICATE PRECISION

No VOC field duplicate samples were reported for this SDG.

VOLATILE ORGANICS CALIBRATION SUMMARY SW-846, Method 8260

Client: Malcolm Pirnie, Inc.

Project: Flexo Site R.I. ; Seneca St.

C. CONTINUING CALIBRATIONS CALIBRATION DATE :

ALL target RRFs > 0.05 ? SPCC RRFs > min. values ?

Targets < 20%D or Drift ?

CCC %Ds < 20% ?

(If No, list compounds)===> n/a Associated samples:

FILE ID :

Laboratory: TestAmerica Buffalo

Laboratory Job No.: RSL0710

12/17/09

F2353.D

Yes

Yes

Yes

Yes

all

A. INSTRUMENT PERFORMANCE (BFB TUNE)

Review Level:

| TUNE DATE: | 12/15/09 | 12/17/09 |
|-------------------------|----------|----------|
| TUNE FILE: | F2307.D | F2352.D |
| BFB INJECTION TIME: | 12:58 | 16:30 |
| LAST SAMPLE INJECTION: | 15:34 | 22:38 |
| m/z RATIOS ACCEPTABLE ? | Yes | Yes |

NYSDEC 'DUSR'

B. INITIAL CALIBRATION

| CALIBRATION DATE : | |
|------------------------------|------------|
| FILE IDs : | F2309 - 13 |
| ALL target RRFs > 0.05 ? | Yes |
| SPCC RRFs > min.values? | Yes |
| CCC %RSDs < 30% ? | Yes |
| All Targets < 15% RSD? | No |
| If No, regression r > 0.99 ? | Yes |
| (If No, list compounds)===> | |
| Associated samples: | all |

D. SAMPLE RESULT VERIFICATION

| COMPOUND : REPORTED VALUE : | E4 (0.8-1.1) acetone 32 | ug/Kg | Int. Std. : 1 | ,4-difluorobenzene | Non-Aqueous (low-level) (Ax) (Is) (Df) (Ais) (RRF) (Ws) (D) |
|--------------------------------|-------------------------------|--------|---------------|--------------------|---|
| Ax | İs | Df | | | (/ (|
| 20332 | 250 | 1.0 | | | |
| 406743 | 0.096 | 5.09 | | 0.789 | 7 |
| Ais | RRF | Ws | | D | 1 |
| | | | | D |] |
| ug/Kg = | 32.4 | Result | verified ? | Yes | 7 |

Page 1 of 1

SEMI-VOLATILE ORGANICS QC PARAMETER / QUALIFIER SUMMARY SW846 8270

Client: Malcolm Pirnie, Inc.

Project: Flexo Site R.I. ; Seneca St.

Laboratory Job No.:

RSL0710

Review Level: NYSDEC 'DUSR' Laboratory: TestAmerica Buffato

Α. HOLDING TIMES (NYSDEC-ASP)

| AQUEOUS MATRIX: | 5 DAYS MAX. VTSR TO EXTRACTION / 40 DAYS MAX. EXTRACTION TO ANALYSIS |
|---------------------|---|
| | SAMPLES AND EXTRACTS MUST BE MAINTAINED AT 4 +/- 2 DEGREES C |
| NON-AQUEOUS MATRIX: | 10 DAYS MAX. VTSR TO EXTRACTION / 40 DAYS MAX, EXTRACTION TO ANALYSIS |
| | SAMPLES AND EXTRACTS MUST BE MAINTAINED AT 4 +/- 2 DEGREES C |

All non-aqueous samples were extracted within 1 day of VTSR; all samples were analyzed within 1 day of extraction.

QA Action : n/a

METHOD BLANKS Β.

| Blank ID | <u>File ID</u> | Date Extracted | <u>Matrix</u> | Analytes Present | Conc., ppb | Affected Batch |
|--------------|----------------|----------------|---------------|------------------|------------|----------------|
| 9L16086-BLK1 | V8571.D | 12/17/09 | soil | none | n/a | RL91807 |
| | | | | | | |

QA Action: n/a

FIELD BLANKS No field blanks were submitted with this SDG.

C. SURROGATE RECOVERY

Surrogate recoveries were within acceptable limits.

MATRIX SPIKE / DUPLICATE D.

No SVOC MS/MSD samples were reported for this SDG.

E. BLANK SPIKE (LCS) 9L16086-BS1 9L16086-BSD1

Reported recoveries for LCS and LCSD samples were within laboratory-derived limits.

Reported precision (RPD) results between LCS and LCSD concentrations were within acceptable limits.

INTERNAL STANDARDS (IS) F.

tS recoveries & RTs for all SDG samples were within acceptable limits.

FIELD DUPLICATE PRECISION G.

No SVOC field duplicate samples were reported for this SDG.

SEMI-VOLATILE ORGANICS CALIBRATION SUMMARY SW846 METHOD 8270C

| | | SW846 METHO | DD 8270C | | |
|--------------------|-----------------------------|-----------------------------------|----------------------------------|-------------------------|----------|
| | | | | Laboratory | |
| Client: | Malcolm Pimie, Inc. | Project: | Flexo Site R.I. ; Seneca St. | Job No.: | RSL0710 |
| Chotha | | 1 10/000 | 1.000.000.000.000.000 | 000 110.1 | 10207 10 |
| | | | | | |
| De la st | | 1 - 1 | T | | |
| Review Level: | NYSDEC 'DUSR' | Laboratory: | TestAmerica Buffalo | | |
| | | | | | |
| Α. | INSTRUMENT PERFORMAN | ICE_(DFTPP_TUNE) | | | |
| | TUNE DATE: | 12/09/09 | 12/18/09 | | |
| | TUNE FILE: | V8269.D | V8567,D | | |
| | DFTPP INJECTION TIME: | 16:53 | 13:07 | | |
| LAST IN JECTION | WITHIN 12-HR. WINDOW ? | - | Yes | | |
| | m/z RATIOS ACCEPTABLE ? | | Yes | | |
| | III/2 RATIOS ACCEPTABLE ? | Tes | l les | | |
| - | | | | | |
| В. | INITIAL CALIBRATION | | | | |
| | SPCC Compounds | CALIBRATION DATE : | 12/09/09 | | |
| | Base/Neutrals | FILE ID; | V8272 - 77.D | | |
| | N-Nitroso-di-n-propylamine | All target RRFs >0.05? | Yes | | |
| | Hexachlorocyclopentadiene | All target %RSDs < 15% ? | No | | |
| | | | | | |
| | Acids | If No, Regression established? | | | |
| | 2,4-Dinitrophenol | Correlation > 0.99 ? | Yes | | |
| | 4-Nitrophenol | (If No, list compounds) ==> | | | |
| | MINIMUM RRF = 0.050 | | | | |
| | | QA ACTION: | n/a | <u>n/a</u> | |
| | CCC Compounds | | | | |
| | Base/Neutrals | | | | |
| | | | | | |
| | Acenaphthene | | | | |
| | 1,4-Dichlorobenzene | | | | |
| | Hexachlorobutadiene | | | | |
| | Diphenylamine | NOTE: | | | |
| | Di-n-octylphthalate | Linear or non-linear regression a | cceptable alternatives for compo | ounds w/ %RSD >15%. | |
| | Fluoranthene | Linear regression r values must t | e 0.99 minimum for these comp | ounds. | |
| | Benzo(a)pyrene | Non-linear COD values must be | | | |
| | | for second-order, and minimum 7 | | ndo, min minimum o pro- | |
| | 4-Chloro-3-methylphenol | io: second order, and minimum / | plation initia-oraci equationat | | |
| | | | | | |
| | 2,4-Dichlorophenol | | | | |
| | 2-Nitrophenol | | | | |
| | Phenol | | | | |
| | Pentachlorophenol | | | | |
| | 2,4,6-Trichlorophenol | | | | |
| | MAXIMUM %RSD = 30.0% | | | | |
| | MAXIMUM %D = 20.0% | | | | |
| | 10-X111010 /0D - 20.078 | | | | |
| | | _ | | | |
| C. | CONTINUING CALIBRATION | <u>s</u> | | | |
| | | | | | |
| | CALIBRATION DATE : | 12/18/09 | | | |
| | FILE ID: | V8567,68 | | | |
| | All target & SPCC RRFs >0.0 | Yes | | | |
| | CCC %Ds < 20% ? | Yes | | | |
| All tereste ±/ 200 | | | | | |
| | %D or 80 -120% True Value? | NO | | | |
| | | nitrobenzene +20.5% | | | |
| | | 2-nitroaniline +24% | | | |
| | | 4-nitrophenol +27% | | | |
| | | benzaldehyde +35% | | | |
| | | 4-methylphenol -29% | | | |
| | Affected samples : | | | | |
| | , allocida outripido i [| | I | | |

QA Action : For targets w/ %D >-20% : Flag non-detects 'UJ' and positives 'J' in affected samples; negative bias on RL or positive value. For targets w/ %D >+20% : Flag positives 'J' in affected samples; positive bias on positive value.

SEMI-VOLATILE ORGANICS CALIBRATION SUMMARY SW846 METHOD 8270C

ug/Kg

Lab Job No.: <u>RSL0710</u>

LIENT: <u>Malcolm Pirnie, Inc.</u> PROJECT: <u>Flexo Site R.I. ; Seneca St.</u>

Laboratory : <u>TestAmerica Buffalo</u>

CLIENT:

D.

Review Level:

SAMPLE RESULT VERIFICATION SAMPLE ID: E4 (0.8 - 1.1) COMPOUND: benzo(b)fluoranthene REPORTED VALUE: 450

NYSDEC 'DUSR'

Int. Std.: perylene-d12

| | Ax | ls | Vt | Df | GPC | | |
|---------|--------|-------|--|-----------------|---------------|--|--|
| ug/Kg = | 5312 | 40 | 1000 | 10 | 1.0 | | |
| Γ | 148974 | t.345 | 1.0 | 30,17 | 0.789 | | |
| | Ais | RRF | Vi | Ws | D | | |
| ug/Kg = | 446 | 7 | Result verified ? | Yes | OK - rounding | | |
| ug/kg = | 440 | | Resolt verhied ? | res | OK - rounding | | |
| Where : | Ax | = | area of quant ion for target o | ompound | | | |
| | ls | = | amount of internal standard injected, ng | | | | |
| | Vt | = | volume of extract concentrate, ul. | | | | |
| | Df | = | Extract dilution factor | | | | |
| | GPC | = | GPC factor (1.0 for no clean | up; 2.0 for GPC | cleanup) | | |
| | Ais | = | area of quant ion for internal | standard | | | |
| | RRF | = | relative response factor, ave | rage from ICAL | | | |
| | Vi | ⇒ | extract volume injected, ut. | 5 | | | |
| | , Ws | = | sample mass extracted, gm | (wet) | | | |
| | , D | = | % Solids / 100 | • • | | | |

PCB ANALYSIS QC PARAMETER / QUALIFIER SUMMARY SW-846 Method 8082

| Client: <u>N</u> | Malcolm Pimie, Inc. | Project: Flexo Site R.I.; Seneca St. | Laboratory Job No.: <u>RSL0710</u> |
|------------------|---------------------|--------------------------------------|---------------------------------------|
| Review Level: | NYSDEC 'DUSR' | Laboratory: TestAmerica Buffato | |

A. HOLDING TIMES (NYSDEC-ASP)

| AQUEDUS MATRIX: | 5 DAYS MAX. VTSR TO EXTRACTION / 40 DAYS MAX. EXTRACTION TO ANALYSIS |
|---------------------|---|
| | SAMPLES AND EXTRACTS MUST BE MAINTAINED AT 4 +/- 2 DEGREES C |
| NON-AQUEOUS MATRIX: | 10 DAYS MAX, VTSR TO EXTRACTION / 40 DAYS MAX, EXTRACTION TO ANALYSIS |
| | SAMPLES AND EXTRACTS MUST BE MAINTAINED AT 4 +/- 2 DEGREES C |

Non-aqueous samples were extracted within 2 days of VTSR; samples were analyzed within 2 days of extraction.

B. METHOD BLANKS

| | lank ID | Date Extracted | Date Analyzed | Matrix | Analytes Present | Conc., ppb | Action Level |
|-------------|-----------|----------------|---------------|--------|------------------|------------|--------------|
| 9L16 | 110-BLK1 | 12/17/09 | 12/18/09 | soit | AR-1254 | 33 | 33 |
| 9L16 | 6111-BLK1 | 12/17/09 | 12/18/09 | soit | AR-1242 | 7.1 J | 7.1 |
| | | | | | AR-1254 | 27 P | 27 |
| | | | | | AR-1260 | 3.8 JP | 3.8 |
| <u>9L17</u> | 095-BLK1 | 12/18/09 | 12/20/09 | soil | AR-1254 | 4.1 J | 4.1 |

QA Action : 1) If blank result is positive but <RL, and associated sample result is positive but <RL, report RL value with 'U' flag. 2) If blank result is positive >RL, and associated sample result is >RL and <Blank, report sample with 'U' flag. 3) If blank result is positive >RL, and associated sample result is >RL and >Blank, report sample unflagged.

Comments: All positive sample results were compared to associated blank action levels, with adjustment for dilutions. Sample results were > Action Levels; no sample results required qualification due to blank contamination.

C. INSTRUMENT BLANKS

Injection logs indicated that instrument blanks were run following each CCV.

D. SURROGATE RECOVERY

All SDG samples, with the exception of A-L, were analyzed at extract dilutions ranging from 4x to 10,000x, due to high concentrations of Aroctors in the samples. Therefore, all surrogate recoveries, with the exception of sample A-L, exhibited no quantifiable recoveries of surrogates due to these dilutions, and were labeled as 'D' (diluted-out) by the laboratory.

| Ε. | MATRIX SPIKE / DUPLICATE | | <u>H-U (100x)</u> | H-U (100x) K-U (2000x) QA Action | | | | |
|---|--|--|-------------------|----------------------------------|--|--|--|--|
| | | AR1016 | no recovery | no recovery | Samples were analyzed at high extract dilution lactors | | | |
| | AR1260 | | 1700%, 2680% | no recovery | which precluded spike recovery. See comments below. | | | |
| | Comments: | | | | xhibited acceptable recoveries and precision. | | | |
| | | Both spike samples shown above were not spiked at an appropriate tevel based on Aroclor concentrations pr | | | | | | |
| | | | | | ions necessary to bring these concentrations within | | | |
| | calibrated range. Effectively, the spike-added concentrations were masked by the dilution (for AR1016) and o | | | | | | | |
| | | whelmed by the native concentration (for AR1260). Therefore, these samples provide no meaningful information | | | | | | |
| relative to potential sample matrix effects which may be present. | | | | | | | | |

F. BLANK SPIKE / BLANK SPIKE DUPLICATE (LCS / LCSD) 9L16110-BS1 9L16111-BS1 9L17095-BS1

LCS / LCSD recoveries and precision values were within limits.

PCB ANALYSIS QC PARAMETER / QUALIFIER SUMMARY SW-846 Method 8082

| | | Laboratory | |
|-----------------------------|---------------------------------------|------------|---------|
| Client: Malcolm Pimie, Inc. | Project: Flexo Site R.I. ; Seneca St. | Job No.: | RSL0710 |
| | | | |
| | | | |

Review Level: NYSDEC 'DUSR' Laboratory: TestAmerica Buffaio

G. SAMPLE QUALITATIVE VERIFICATION

 The following samples exhibited inter-column concentrations which exceeded 25% difference (%D), and were qualified as indicated.

 Sample ID
 Aroclor (AR-)
 % Difference
 QA Action

| Sample ID | Arocior (AR-) | % Difference | <u>UA Action</u> |
|-----------------|---------------|--------------|--|
| G-L | 1260 | 33 | Flag reported result 'J', as quantitatively estimated value |
| C-U | 1242 | 28 | Flag reported result 'J', as quantitatively estimated value |
| DUP-U | 1260 | 172 | Flag reported result 'NJ', as quantitatively estimated value |
| O-U | 1260 | 30 | Flag reported result 'J', as quantitatively estimated value |
| O-L | 1260 | 43 | Flag reported result 'J', as quantitatively estimated value |
| N-U | 1260 | 79 | Flag reported result 'J', as quantitatively estimated value |
| N-L | 1260 | 77 | Flag reported result 'J', as quantitatively estimated value |
| M-U | 1260 | t56 | Flag reported result 'NJ', as quantitatively estimated value |
| M-L | 1260 | 127 | Flag reported result 'NJ', as quantitatively estimated value |
| L-U | 1260 | 187 | Flag reported result 'NJ', as quantitatively estimated value |
| L-L | 1260 | 125 | Flag reported result 'NJ', as quantitatively estimated value |
| K-U | 1260 | 79 | Flag reported result 'J', as quantitatively estimated value |
| K-L | 1260 | 84 | Flag reported result 'J', as quantitatively estimated value |
| J-U | 1254 | 67 | Flag reported result 'J', as quantitatively estimated value |
| J-L | 1254 | 42 | Flag reported result 'J', as quantitatively estimated value |
| B-U | 1248 | 71 | Flag reported result 'J', as quantitatively estimated value |
| 8-U | 1254 | 56 | Flag reported result 'J', as quantitatively estimated value |
| B-U | t260 | 60 | Flag reported result 'J', as quantitatively estimated value |
| | 1248 | 180 | Flag reported result 'NJ', as guantitatively estimated value |
| B₊L | 1254 | 87 | Flag reported result 'J', as quantitatively estimated value |
| A-U | 1248 | 193 | Flag reported result 'NJ', as quantitatively estimated value |
| A-U | 1254 | 75 | Flag reported result 'J', as quantitatively estimated value |
| A-L | 1254 | 59 | Flag reported result 'J', as quantitatively estimated value |
| E-U | 1254 | 51 | Flag reported result 'J', as quantitatively estimated value |
| E-L | 1248 | 245 | Flag reported result 'NJ', as quantitatively estimated value |
| E-L | t254 | 79 | Flag reported result 'J', as quantitatively estimated value |
| -U | 1254 | 62 | Flag reported result 'J', as quantitatively estimated value |
| E4 (0.8-1.1) | 1254 | 52 | Flag reported result 'J', as quantitatively estimated value |
| LD-W | 1254 | 60 | Flag reported result 'J', as quantitatively estimated value |
| | | | |
| FIELD DUPLICATI | E PRECISION | | |
| | <u>C-L</u> | DUP-L | RPD, % QA Action |
| AR1242 | 3500 | 2800 | 22.2 n/a |
| AR1254 | 14000 | 11000 | 24.0 |
| AR1260 | 22000 | 16000 | 31.6 |
| Total Aroclors | 39500 | 29800 | 28.0 |

| | 11000 | 24.0 |
|---|-------|------|
| 1 | 16000 | 31.6 |
| | 29800 | 28.0 |

| | <u>L-U</u> | <u>DUP-U</u> | <u>RPD, %</u> | QA Action |
|----------------|------------|--------------|---------------|--|
| AR1254 | 2800000 | 960000 | 97. 9 | Flag results for AR1254, AR1260 and |
| AR1260 | 290000 | 90000 | 105.3 | Total Aroclors in samples L-U and DUP-U |
| Total Aroclors | 3090000 | t050000 | 98.6 | as estimated, J, with indeterminate bias direction |

Η.

CALIBRATION SUMMARY SW-846 Method 8082

| | | Laboratory | |
|------------------------------|---------------------------------------|------------|---------|
| Client: Malcolm Pirnie, Inc. | Project: Flexo Site R.J. ; Seneca St. | Job No.: | RSL0710 |

Review Level: NYSDEC 'DUSR' Laboratory: TestAmerica Buffalo

A. INITIAL CALIBRATION

| CALIBRATION DATE : | 11/15/09 | HP6890-7 | 11/16/09 | HP5890-19 |
|-------------------------|-----------------------|----------------------|--------------------|------------------|
| Mean RSD < 20%? | yes | | yes | |
| Lin Regression r>0.99 ? | yes | | yes | |
| 2nd-order COD >0.99 ? | n/a | | n/a | |
| Associated samples : | C, D, F, G, H, DUP, H | (, L, M, N, O, P 🏾 * | A, B, E, I, J, LD, | E4 * |
| | * Above samples are | | * Above sample: | s are prefix IDs |

B. CONTINUING CALIBRATIONS (CCV)

| HP6890-7 | CCV1 | CCV2 | CCV3 | CCV4 | CCV5 | CCV1 | CCV2 |
|----------------------------|------------------|-----------------------|---------------|---------------|-------------|------------|-----------|
| CALIBRATION DATE : | 12/18/09 | 12/18/09 | 12/18/09 | 12/19/09 | 12/19/09 | 12/19/09 | 12/19/09 |
| FILE IDs : | 7a102_128 | 7a102_140 | 7a102_148 | 7a102_160 | 7a102_170 | 7a102_180 | 7a102_188 |
| TIME : | 12:09 | 18:57 | 21:23 | 01:02 | 04:05 | 07:08 | 11:21 |
| Al slart of sequence? | Yes | n/a | n/a | n/a | n/a | Yes | n/a |
| Afler every 10 samples? | n/a | Yes | Yes | Yes | Yes | n/a | n/a |
| Al end of sequence? | n/a | n/a | n/a | n/a | n/a | n/a | Yes |
| %D <u><</u> 15? | NO | Yes | NO | Yes | NO | Yes | Yes |
| If No, list compounds ===> | AR1260 +19% | | AR1260 +17% | | AR1260 +18% | | |
| Affected Samples : | P, 0, N (-U, -L) | I M, L, K (-U, -L) | H, G (-U, -L) | C, D (-U, -L) | DUP-L, F-U | DUP-U, F-L | L |

QA ACTION : Average %D results were >+15% for AR1260 for at least one column; method requires both columns to meet criteria. Since exceedances were positive with respect to ICAL average (i.e., increased sensitivity) positive results for 1260 were flagged 'J' as quantitatively estimated, with potential high bias indicated.

| HP5890-19 | CCV1 | CCV2 | CCV3 |
|----------------------------|------------------|---------------|------------------|
| CALIBRATION DATE : | 12/20/09 | 12/20/09 | 12/20/09 |
| FiLE IDs : | 19a108_058 | 19a108_070 | 19a108_079 |
| TIME : | 06:37 | 11:37 | 14:33 |
| At slart of sequence? | Yes | n/a | n/a |
| After every 10 samples? | n/a | Yes | n/a |
| At end of sequence? | n/a | n/a | Yes |
| %D <u><</u> 15? | Yes | NO | NO |
| If No, lisl compounds ===> | | AR1016 +17% | AR1016 +15.2% |
| Affected Samples : | J, B, A (-U, -L) | E, J (-U, -L) | L E4, LD-W,-S |

QA ACTION: %D results were >+15% for AR1016; since no positive responses were found for AR1016 in affected samples, no data qualifiers were assigned.

Page 2 of 2

CALIBRATION SUMMARY SW846 METHOD 8082

,

| 34V840 INE 1 HOD 8062 | | | | | | | |
|-----------------------|---|---------------------------------|------------------------------------|----------------------------------|---|------------------------|---------------|
| | Client: | Malcolm Pirnie, Inc. | Project: | Flexo Site R.I. ; § | Seneca St. | Laboratory Job No.: | RSL0710 |
| | Review Level: | NYSDEC 'DUSR' | Laboratory: | <u>TestAmerica Buf</u> | falo | | |
| D. | SAMPLE RESULT VERI | | | | HP6890-7 | | |
| | <u>Sample ID</u> F-U File ID = 7a102_168 | <u>Analvte</u> AR1260 | Reported Result 1100000 | ug/Kg | <u>Column 1</u> peak at RT = 5. | .69 minutes | |
| | ug/Kg = | peak response 346970 | final volume, ul. 10000 | dilution factor 10000 | ug/Kg = | 1077103 | |
| | | 1199405 CalFactor | 30.31 sample wet weight | 0.8861 %solids/100 | | | |
| | | | | Res | ult verified ? | yes | OK - rounding |
| | <u>Sample ID</u> A-U File ID = 19b108_068 | <u>Analyte</u> AR1260 | <u>Reported Result</u> 29000 | ug/Kg | HP5890-19 <u>Column 2</u> peak at RT = 4. | 83 minutes | |
| | ug/Kg = | peak response 54306 85034 | final volume, uL 10000 30.95 | dilution factor 100 0.7132 | ug/Kg = | 28932 | |
| | | CalFactor | sample wet weight | <u>%solids/100</u> Res | ult verified ? | yes | OK - rounding |

February 15, 2010

Malcolm Pirnie, Inc. Att: Mr. James Richert 50 Fountain Plaza, Suite 600 Buffalo, New York 14202

Re: Flexo Site Data Deliverables; Laboratory SDG No. NY134355

Malcolm Pirnie Project No. : 6105-002

Dear Mr. Richert,

Enclosed with this cover letter are the results of our data review of the laboratory deliverables pertaining to the referenced site. The review was conducted according to the guidelines established by NYSDEC's Data Usability Summary Review ('DUSR') process; data flags (qualifiers) were assigned to samples based on guidance contained in EPA Region II's TO-15 Volatile Organic data validation guidelines.

Site Name: Flexo Site

Fractions: TO-15 Volatile Organics Laboratory: TestAmerica Burlington Matrix: Air (Soil Gas)

Reviewer: Chris Taylor

Prepared By: Environmental Quality Associates, Inc.

SECTION A Sample Information

The above-referenced analytical SDG numbers / samples were analyzed by Test America Laboratories, Inc., South Burlington, VT. Four canisters plus one field duplicate were collected on 10/21/09. Sample canisters were received at the laboratory on 10/23/09, in good condition and at appropriate post-sample vacuum levels, as noted by the laboratory sample receipt log. Samples were analyzed for volatile organics by EPA Air Toxics Method TO-15.

SECTION B

General Comments

Summary of data completeness and overall quality of data deliverables package

Data deliverables were complete as received. The laboratory narrative indicated that sample 'SV-2' was analyzed at a 4x dilution, based on pre-analysis screening scan; the reported RL values for SV-2 therefore reflect a 4x increase due to this dilution.

Malcolm Pirnie, Inc. / Mr. James Richert

February 15, 2010

Overall data quality

Data quality was acceptable, incorporating any data qualifiers as detailed in the accompanying QC and calibration summary forms.

SECTION C Volatile Organic Fraction

Method holding times from collection to analysis of 30-days maximum were met for all samples.

Internal standard recoveries were within acceptable limits for all samples. Method blank (MBLK102909CA) was free of contamination. Initial and continuing calibration criteria were within acceptable ranges, with the following exception: the %D value for bromoform exceeded 30% (at +34%). Since the exceedance was positive, i.e., greater sensitivity relative to the initial calibration average response factor, and no positives for bromoform were found in associated field samples, no QA action was necessary..

Samples 'SV-4' and "DUP' were identified as collocated field duplicate samples. RPD values were calculated for positive results and are shown on the QC summary form noted below. Per EPA Region II validation guidance, no action levels or RPD limits are specified for field duplicates for this method.

Chromatographic spectra for reported positive compounds were randomly verified and no disparities with reported results were noted.

<u>SECTION D</u>

Sample Result Verification

A positive target compound in a sample was randomly selected for verification of reported result from the raw data. The reported value for 1,1,1-trichloroethane in sample 'SV-2' was successfully verified.

SECTION E

Overall Recommendations

The results of the review and qualification process for the above analytical fractions and associated samples are summarized on the attached QC and Calibration summary tables for each specific analytical fraction, in order to facilitate the end-user's' review of these data. No data qualifiers were necessary for the associated samples.

Very truly yours, Environmental Quality Associates, Inc.

Chris W. Taylor Vice President

/cwt Attachments

Environmental Quality Associates, Inc.

VOLATILE ORGANICS IN AMBIENT AIR / SOIL GAS QC PARAMETER / QUALIFIER SUMMARY EPA - ORD Method TO-15

| | | | | OID MELIOU TO-T | <u> </u> | | |
|---|--|------------------------------------|---------------------------|----------------------|-----------------------|---------------------------|----------|
| | Client: | Malcolm Pirnie, Inc. | Project: | Flexo Site | | Laboratory SDG No.: | NY134355 |
| | Review Level: | NYSDEC 'DUSR' | Laboratory: | TestAmerica Burlin | gton | | |
| | HOLDING TIME | <u>S</u> | | | | | |
| | MAXIMUM 30 D | AYS FROM COLLECTION | TO ANALYSIS | | | | |
| | All air samples w | vere analyzed within <u>8</u> days | of collection. | | | | |
| • | METHOD BLAN Date Analyzed 10/29/09 | Blank ID | <u>File ID</u> CIPB01B | <u>Matrix</u> air | Analytes Present none | <u>Conc., ppbv</u> n/a | |
| | BLANK SPIKE (| LCS) CA102 | 2909LCS | | | | |
| | All target compos | und recoveries were within | acceptable limit | s in the LCS. | | | |
| | FIELD DUPLICA | TE SAMPLE PRECISION | ppbv | ppbv | | | |
| | | <u>Compound</u> | <u>SV-4</u> | DUP | <u>RPD, %</u> | QA Action | |
| | | Methylene Chloride | 0.58 | 0.50 U | | n/a | |
| | | n-Hexane | 1.8 | 3.0 | 50 | | |
| | | Cyclohexane | 0.44 | 1.1 | 86 | | |
| | | n-Heptane | 0.56 | 1.4 | 86 | | |

All other results for target compounds in the field duplicates were reported as non-detects 'U'.

E. INTERNAL STANDARDS

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C.

D.

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All internal standard recoveries and retention times were within acceptable method ranges.

Page 1 of 1

Laboratory

SDG No.: NY134355

VOLATILE ORGANICS IN AMBIENT AIR / SOIL GAS CALIBRATION SUMMARY EPA - ORD Method TO-15

| Client: | Malcolm Pirnie, Inc. | Project: | Flexo Site |
|---|---------------------------|--|------------------------|
| | NYSDEC 'DUSR' | Laboratory: | TestAmerica Burlington |
| A. INSTRUMENT PERFORM | NCE (BFB TUNE) | | |
| TUNE DATE: TUNE FILE: BFB INJECTION TIME: LAST SAMPLE INJECTION: m/z RATIOS ACCEPTABLE ? B. <u>INITIAL CALIBRATION</u> | | 10/29/09 CIP03PV 13:44 20:48 Yes ccal | |
| CALIBRATION DATE : FILE IDs : | 10/27/09 CIP002V - 40V | | |
| Minimum 5-points ? | Yes | 1 | |
| Target* RRFs > 0.05 ? | Yes | | |
| All Targets < 30% RSD? | Yes | ~ | |
| (If No, list compounds)===> | | | |

* 2-butanone (MEK), CS2, chloroethane, chloromethane, 1,2-dibromoethane, 1,2-dichloropropane, 1,4-dioxane, 1,2-dibromo-3-chloropropane and methylene chloride must meet RRF ≥0.01

C. CONTINUING CALIBRATIONS

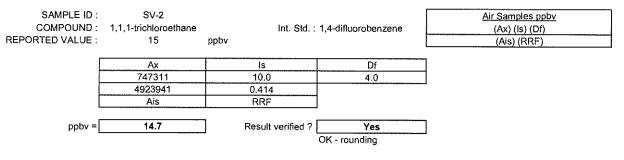
| CALIBRATION DATE : | 10/29/09 |
|-----------------------------|------------------|
| FILE ID : | CIP10BV |
| Targe1* RRFs > 0.05 ? | Yes |
| All Targets <30%D ? | NO |
| (If No, list compounds)===> | bromoform +30.4% |
| | |
| Affected samples: | SV-1,2,3,4,DUP |

Affected samples: SV-1,2,3,4,DUP

QA ACTION

Comments : no positives for the above compound was found in field samples; no QA action necessary.

D. SAMPLE RESULT VERIFICATION



February 18, 2010

Malcolm Pirnie, Inc. Att: Mr. James Richert 50 Fountain Plaza, Suite 600 Buffalo, New York 14202

Re: Flexo Remediation Investigation Site Data Deliverables; Laboratory No. RSJ1493

Malcolm Pirnie Project / Task Order No. : 6105-002

Dear Mr. Richert,

Enclosed with this cover letter are the results of our data review of the laboratory deliverables pertaining to the referenced site. The review was conducted according to the guidelines established by NYSDEC's Data Usability Summary Review ('DUSR') process; data flags (qualifiers) were assigned to samples based on guidance contained in EPA Region II's Inorganic and Organic data validation guidelines.

Site Name: Flexo Transparent R.I.; 1132 & 1146 Seneca Street Site, Buffalo, NY

Fractions: Polychlorinated Biphenyls (PCBs)

Laboratory: TestA Matrix: Non-A

TestAmerica Non-Aqueous

Reviewer: Chris Taylor

Prepared By: Environmental Quality Associates, Inc.

<u>SECTION A</u> Sample Information

The above-referenced analytical job numbers / samples were analyzed by TestAmerica Buffalo, Amherst, New York. Samples were analyzed for polychlorinated biphenyls (PCB, 9), in addition to any matrix spikes and duplicates for each analytical fraction.

Samples were collected on 10/26 and 10/28/2009, and were received at the laboratory (VTSR) on 10/28/2009 in good condition, at 5.6 degrees Centigrade, with ice noted as present.

SECTION B General Comments

Summary of data completeness and overall quality of data deliverables package

Data deliverables were complete as received.

Malcolm Pirnie, Inc. / Mr. James Richert

February 18, 2010

Overall data quality

Data quality was acceptable, incorporating applied data qualifiers as detailed in the accompanying QC and calibration summary forms, and discussed in the fraction-specific sections below.

SECTION C

Polychlorinated Biphenyls (PCBs)

All SDG samples, with the exception of RILD-BTM(NO) and RILD-BTM(SO), were analyzed and reported at extract dilutions ranging from 2x to 5,000x, resulting in corresponding increases in analyte RL values.

Several samples presented inter-column precision results above 25%D for Aroclors 1242 and/or 1260. These results were flagged as quantitatively estimated 'J'. These samples and Aroclors are detailed on the attached QC summary form.

No MS/MSD samples were reported for this sample group; no field duplicates were identified for this sample group.

Continuing calibration (CCV) response %D results exceeded -15% for Aroclor 1016 and Aroclor 1260 in the analytical sequence CCV on 10/30/09, affecting all SDG samples. Results for the noted Aroclors in affected samples were flagged 'UJ' or 'J', as estimated RL values or positive results, with negative bias indicated due to reduced calibration sensitivity in the calibration verifications.

SECTION D

Overall Recommendations

The results of the review and qualification process for the above analytical fractions and associated samples are summarized on the attached QC and Calibration summary tables for each specific analytical fraction, in order to facilitate the end-user's' review of these data. Data qualifiers have been applied directly to the laboratory EDD spreadsheet (database), and are detailed in the corresponding QC / Calibration summaries.

Very truly yours, Environmental Quality Associates, Inc.

Chris W. Taylor Vice President

/cwt Attachments

Environmental Quality Associates, Inc.

PCB ANALYSIS QC PARAMETER / QUALIFIER SUMMARY SW-846 Method 8082

| | | 044-040 | Metriod 8082 | |
|--|--|--|---|--|
| Client | Malcolm Pirnie, Inc. | Project | <u>Flexo Site R.I. ; Seneca St.</u> | Laboratory Job No.: <u>RSJ1493</u> |
| Review Level | NYSDEC 'DUSR' | Laboratory | TestAmerica Buffalo | |
| HOLDING TIMES (| NYSDEC-ASP) | | | |
| AQUEOUS MATRIX | ‹ : | | OR TO EXTRACTION / 40 DAYS M XTRACTS MUST BE MAINTAINE | IAX. EXTRACTION TO ANALYSIS D AT 4 +/- 2 DEGREES C |
| NON-AQUEOUS M | ATRIX: | | SR TO EXTRACTION / 40 DAYS XTRACTS MUST BE MAINTAINED | MAX. EXTRACTION TO ANALYSIS O AT 4 +/- 2 DEGREES C |
| Non-aqueous samp | les were extracted with | in <u>1</u> day of VTSR; sa | mples were analyzed within <u>1</u> day o | of extraction. |
| QA Action : | n/a | | | |
| METHOD BLANKS Blank ID 9J29037-BLK1 9J28119-BLK1 QA Action : | <u>Date Extracted</u> 10/29/09 10/29/09 n/a | <u>Date Analyzed</u> 10/30/09 10/30/09 | <u>Matrix Analytes Pre</u> wipe none soil none | esent <u>Conc., ppb</u> n/a n/a |
| INSTRUMENT BLA | NKS | | | |
| Injection logs indical | ted that instrument blar | nks were run following | g each CCV. | |
| SURROGATE RECO Sample ID RI-RAIL (WIPE) | <u>DVERY</u> Surrogate TCMX & DCBP | <u>Recovery / Bias</u> no recovery | QA Action | |
| LD-A1 LD-B1 LD-C1 | TCMX & DCBP TCMX & DCBP TCMX & DCBP TCMX & DCBP | no recovery no recovery no recovery | target analytes. Surrogates were | ; from 100x to 5000x due to high levels of diluted out. |
| RILD-EAST-N RILD-EAST-S | TCMX & DCBP TCMX & DCBP | no recovery no recovery | | |
| | | | | |

E. MATRIX SPIKE / DUPLICATE

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No MS/MSD were reported for this SDG.

F. <u>BLANK SPIKE / BLANK SPIKE DUPLICATE (LCS / LCSD)</u> 9J29037-BS1 9J28119-BS1 Recoveries were within acceptable limits in the blank spike and duplicate samples. Blank spike duplicate precision results were within acceptable limits.

G. SAMPLE QUALITATIVE VERIFICATION

 Sample ID
 Aroclor (AR-)
 % Difference
 QA Action

| LD-B1 | 1242 | 30 | Flag reported result 'J', as quantitatively estimated value |
|---------------|------|----|---|
| LD-B1 | 1260 | 32 | Flag reported result 'J', as quantitatively estimated value |
| RILD-BTM(NO) | 1242 | 43 | Flag reported result 'J', as quantitatively estimated value |
| RILD-BTM(NO) | 1260 | 32 | Flag reported result 'J', as quantitatively estimated value |
| RILD-EAST(SO) | 1260 | 30 | Flag reported result 'J', as quantitatively estimated value |
| RI-RAIL | 1260 | 27 | Flag reported result 'J', as quantitatively estimated value |
| | | | |

H. FIELD DUPLICATE PRECISION

No field duplicates were identified for this SDG.

PCB ANALYSIS CALIBRATION SUMMARY <u>SW-846 Method 8082</u>

Project: Flexo Site R.I.; Seneca St.

Laboratory Job No.:

<u>RSJ1493</u>

Review Level: <u>NYSDEC 'DUSR'</u> Laboratory: <u>TestAmerica Buffalo</u>

A. INITIAL CALIBRATION

| CALIBRATION DATE : | 11/09/08 | HP5890-19 |
|-------------------------|--------------|-----------|
| FILE IDs : | 19a49175-181 | |
| Mean RSD < 20%? | yes | |
| Lin Regression r>0.99 ? | n/a | |
| 2nd-order COD >0.99 ? | n/a | |
| Associated samples : | All Samples | |

Client: Malcolm Pirnie, Inc.

B. CONTINUING CALIBRATIONS (CCV)

| | CCV1 | CCV2 | CCV1 | CCV2 | CCV3 |
|----------------------------|----------------|-------------|-----------------|----------------|-------------|
| CALIBRATION DATE : | 10/30/09 | 10/30/09 | 10/30/09 | 10/30/09 | 10/30/09 |
| FILE IDs : | 19a156 | 19a163 | 19a163 | 19a173 | 19a178 |
| TIME : | 08:36 | 10:36 | 10:36 | 14:47 | 16:01 |
| At start of sequence? | Yes | n/a | Yes | n/a | n/a |
| After every 10 samples? | n/a | Yes | n/a | Yes | n/a |
| At end of sequence? | n/a | Yes | n/a | n/a | Yes |
| %D <u>≤</u> 15? | NO | NO | NO | NÔ | NO |
| If No, list compounds ===> | AR1016 -25% | AR1016 -25% | AR1016 -25% | AR1016 -23% | AR1016 -25% |
| | AR1260 -22% | AR1260 -19% | AR1260 -19% | AR1260 -17% | AR1260 -18% |
| Affected Samples : | RI-RAIL (WIPE) | | All samples EXC | EPT RI-RAIL (W | IPE) |

QA ACTION: %D results were >15% for AR1016 &/or AR1260 for at least one quant. peak; since responses were negative with respect to ICAL average (i.e., reduced sensitivity) reported results for AR1016 and AR1260 were flagged as quantitatively estimated, 'U J' or 'J', with low bias indicated.

C. SAMPLE RESULT VERIFICATION

| Sample ID | Analyte | Reported Resul | t | Column 1 |
|------------------|---------|----------------|-------|---------------------------|
| LD-A1 | AR1260 | 230000 | ug/Kg | peak at RT = 5.22 minutes |
| File ID = 19a168 | | | | |

Primary column

| | peak response | final volume, uL | dilution factor | | |
|---------|---------------|--------------------|-----------------|---------|--------|
| ug/Kg = | 16628 | 10000 | 5000 | ug/Kg = | 229182 |
| | 128677 | 30.22 | 0.9329 | | |
| | CalFactor | sample wet weight | %solids/100 | | |
| l | Carractor | Isample wet weight | 76SUIIdS/100 | | |

Result verified ? yes OK-rounding

@BCL@14144EEE.xls

February 18, 2010

Malcolm Pirnie, Inc. Att: Mr. James Richert 50 Fountain Plaza, Suite 600 Buffalo, New York 14202

Re: Flexo Remediation Investigation Site Data Deliverables; Laboratory No. RSJ1639

Malcolm Pirnie Project / Task Order No. : 6105-002

Dear Mr. Richert,

Enclosed with this cover letter are the results of our data review of the laboratory deliverables pertaining to the referenced site. The review was conducted according to the guidelines established by NYSDEC's Data Usability Summary Review ('DUSR') process; data flags (qualifiers) were assigned to samples based on guidance contained in EPA Region II's Inorganic and Organic data validation guidelines.

Site Name: Flexo Transparent R.I.; 1132 & 1146 Seneca Street Site, Buffalo, NY

Fractions: Polychlorinated Biphenyls (PCBs)

Laboratory: TestAmerica Matrix: Non-Aqueous

Reviewer: Chris Taylor

Prepared By: Environmental Quality Associates, Inc.

SECTION A Sample Information

The above-referenced analytical job numbers / samples were analyzed by TestAmerica Buffalo, Amherst, New York. Samples were analyzed for polychlorinated biphenyls (PCB, 6), in addition to any matrix spikes and duplicates for each analytical fraction.

Samples were collected on 10/29/2009, and were received at the laboratory (VTSR) on 10/30/2009 in good condition, at 2.0 degrees Centigrade, with ice noted as present.

SECTION B General Comments

Summary of data completeness and overall quality of data deliverables package

Data deliverables were complete as received.

Malcolm Pirnie, Inc. / Mr. James Richert

February 18, 2010

Overall data quality

Data quality was acceptable, incorporating applied data qualifiers as detailed in the accompanying QC and calibration summary forms, and discussed in the fraction-specific sections below.

SECTION C

Polychlorinated Biphenyls (PCBs)

Samples IRM2-North, IRM2-East and IRM2-DUP#1 were analyzed and reported at extract dilutions of 10x, 5x and 10x, respectively, resulting in corresponding increases in analyte RL values.

Several samples presented inter-column precision results above 25%D for Aroclors 1248 and/or 1260. These results were flagged as quantitatively estimated 'J'. Results which exceeded 100%D inter-column, and exhibited acceptable pattern-match for Aroclor confirmation were flagged as 'NJ', to indicate presumptive presence at estimated quantitation value. These samples and Aroclors are detailed on the attached QC summary.

Continuing calibration (CCV) response %D results exceeded -15% for Aroclor 1016 and Aroclor 1260 in the analytical sequence CCV on 11/01 and 11/02/09, affecting all SDG samples. Results for the noted Aroclors in affected samples were flagged 'UJ' or 'J', as estimated RL values or positive results, with negative bias indicated due to reduced calibration sensitivity in the calibration verifications.

SECTION D

Overall Recommendations

The results of the review and qualification process for the above analytical fractions and associated samples are summarized on the attached QC and Calibration summary tables for each specific analytical fraction, in order to facilitate the end-user's' review of these data. Data qualifiers have been applied directly to the laboratory EDD spreadsheet (database), and are detailed in the corresponding QC / Calibration summaries.

Very truly yours, Environmental Quality Associates, Inc.

Chris W. Taylor Vice President

/cwt Attachments

Environmental Quality Associates, Inc.

PCB ANALYSIS QC PARAMETER / QUALIFIER SUMMARY SW-846 Method 8082

| | | <u>SW-846</u> | Method 8082 | |
|-------------------------|---------------------------|-----------------------------|--|---------------------------------------|
| Clien | t: Malcolm Pirnie, Inc. | Project | Flexo Site R.I. ; Seneca St. | Laboratory Job No.: <u>RSJ1639</u> |
| | | | | |
| Review Level | I: NYSDEC 'DUSR' | Laboratory | TestAmerica Buffalo | |
| HOLDING TIMES | (NYSDEC-ASP) | | | |
| AQUEOUS MATRI | X: | | SR TO EXTRACTION / 40 DAYS MAX. XTRACTS MUST BE MAINTAINED AT | |
| NON-AQUEOUS M | IATRIX: | 10 DAYS MAX. V | ISR TO EXTRACTION / 40 DAYS MAX XTRACTS MUST BE MAINTAINED AT | . EXTRACTION TO ANALYSIS |
| Non-aqueous samp | oles were extracted with | in <u>1</u> day of VTSR; sa | mples were analyzed within <u>2</u> days of e | xtraction. |
| QA Action : | n/a | | | |
| METHOD BLANKS | | | | |
| Blank ID 9J30107-BLK | Date Extracted | Date Analyzed 11/02/09 | Matrix Analytes Present soil none | t <u>Conc., ppb</u> n/a |
| QA Action : | n/a | 1002/03 | son none | 11/2 |
| | | | | |
| INSTRUMENT BLA | NKS | | | |
| Injection logs indica | ited that instrument blar | iks were run followin | g each CCV. | |
| SURROGATE REC | OVERY | | | |
| Sample ID | Surrogate | Recovery / Bias | QA Action | |
| IRM2-NORTH | TCMX & DCBP | no recovery | n/a; samples were run at dilution due t | o high levels of |
| IRM2-DUP#1 | TCMX & DCBP | no recovery | target analytes. Surrogates were dilute | |
| MATRIX SPIKE / DI | UPLICATE | IRM2-BTM | | |
| Recoveries and pre | cision values were with | n acceptable limits. | | |
| BLANK SPIKE (LC | <u>s)</u> | 9J30107-BS1 | | |
| LCS recoveries we | re within limits. | | | |
| SAMPLE QUALITA | TIVE VERIFICATION | | | |
| The following sampl | les exhibited inter-colum | n concentrations wh | ich exceeded 25% difference (%D), and | t were qualified as indicated. |
| Sample ID (RIB-) | Aroclor (AR-) | % Diffference | QA Action | , |
| IRM2-NORTH | 1260 | 60 | Flag reported result 'J', as quantitativel | |
| IRM2-SOUTH | 1248 | 59 | Flag reported result 'J', as quantitativel | |
| IRM2-EAST | 1260 | 75 | Flag reported result 'J', as quantitativel | |
| IRM2-WEST | 1248 | 164 | Flag reported result 'NJ', as quantitativ | |
| IRM2-WEST | 1260 | 63 | Flag reported result 'J', as quantitativel | |
| IRM2-BTM | 1260 | 46 | Flag reported result 'J', as quantitativel | |
| IRM2-DUP#1 | 1248 | 2262 | Flag reported result 'NJ', as quantitativ | |
| IRM2-DUP#1 | 1260 | 1035 | Flag reported result 'NJ', as quantitative | ely estimated value |
| FIELD DUPLICATE | PRECISION | IDM A MARTIN | | |
| | 101010 | IRM-2 NORTH | IRM2-DUP#1 % RPD | |
| | AR1248 | 310 | 290 6.7 | |
| | AR1260 | 1500 | 1700 12.5 | |
| | | | | |

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PCB ANALYSIS CALIBRATION SUMMARY <u>SW-846 Method 8082</u>

Project: Flexo Site R.I.; Seneca St. Job No.:

Job No.: <u>RSJ1639</u>

Review Level: <u>NYSDEC 'DUSR'</u> Laboratory: <u>TestAmerica Buffalo</u>

A. INITIAL CALIBRATION

| CALIBRATION DATE : | 11/09/08 HP5890-19 |
|------------------------|---------------------------------|
| FILE IDs : | 19a49175-181 |
| Mean RSD < 20%? | yes |
| Lin Regression r>0.99? | n/a |
| 2nd-order COD >0.99 ? | n/a |
| Associated samples : | IRM2-N,S,E,W,BTM,-MS,-MSD, DUP# |
| | |

Client: Malcolm Pirnie, Inc.

B. CONTINUING CALIBRATIONS (CCV)

| | CCV1 | CCV2 | CCV1 | CCV2 |
|----------------------------|------------------|-------------|-------------|-------------|
| CALIBRATION DATE : | 11/01/09 | 11/01/09 | 11/02/09 | 11/02/09 |
| FILE IDs : | 19a031 | 19a041 | 19a044 | 19a054 |
| TIME : | 17:06 | 19:32 | 06:36 | 09:02 |
| At start of sequence? | Yes | n/a | Yes | n/a |
| After every 10 samples? | n/a | Yes | n/a | n/a |
| At end of sequence? | n/a | Yes | n/a | Yes |
| %D ≤ 15? | NO | NO | NO | NO |
| If No, list compounds ===> | AR1016 -21% | AR1016 -24% | AR1016 -25% | AR1016 -25% |
| | AR1260 -20% | AR1260 -23% | AR1260 -24% | AR1260 -21% |
| Affected Samples : | IRM2-N,S,E,W,BTM | ,-MS,-MSD | IRM2-DUP#1 | |

QA ACTION: %D results were >15% for AR1016 &/or AR1260 for at least one quant. peak; since responses were negative with respect to ICAL average (i.e., reduced sensitivity) reported results for AR1016 and AR1260 were flagged as quantitatively estimated, 'U J' or 'J', with low bias indicated.

C. <u>SAMPLE RESULT VERIFICATION</u>

| Sample ID | <u>Analyte</u> | Reported Resu | <u>ilt</u> | Column 1 |
|------------------|----------------|---------------|------------|---------------------------|
| IRM2-NORTH | AR1260 | t000 | ug/Kg | peak at RT = 5.22 minutes |
| File ID = 19a035 | | | | |

Primary column

| | peak response | final volume, uL | dilution factor | | |
|---------|---------------|-------------------|-----------------|---------|------|
| ug/Kg = | 27388 | 10000 | 10 | ug/Kg ≂ | 1002 |
| | 128677 | 30.02 | 0.7079 | | |
| | CalFactor | sample wet weight | %solids/100 | 1 | |

Result verified ? yes

April 23, 2010

Malcolm Pirnie, Inc. Att: Mr. James Richert 50 Fountain Plaza, Suite 600 Buffalo, New York 14202

Re: Flexo Remediation Investigation Site Data Deliverables; Laboratory No. 10-1100A; SDG No. 4241

Malcolm Pirnie Project / Task Order No. : 6105-002

Dear Mr. Richert,

Enclosed with this cover letter are the results of our data review of the laboratory deliverables pertaining to the referenced site. The review was conducted according to the guidelines established by NYSDEC's Data Usability Summary Review ('DUSR') process; data flags (qualifiers) were assigned to samples based on guidance contained in EPA Region II's Organic data validation guidelines.

Site Name: Flexo Transparent R.I.; Buffalo, NY

<u>Fractions</u> Polychlorinated Biphenyls (PCBs)

Laboratory: Matrix:

ory: Paradigm Environmental Services Non-Aqueous

Reviewer: Chris Taylor Prepared By: Environmental Quality Associates, Inc.

SECTION A Sample Information

The above-referenced analytical project numbers / samples were analyzed by Paradigm Environmental Services, Inc. Rochester, New York. Eighteen soil samples were analyzed for polychlorinated biphenyls (PCB), in addition to any matrix spikes and duplicates assigned by the client.

Samples were collected on 03/18/2010, and were received under custody seal at the laboratory (VTSR) on 03/19/2010 in good condition, at 6.0 degrees Centigrade, with ice noted as present.

SECTION B

General Comments

Summary of data completeness and overall quality of data deliverables package

Data deliverables were complete as received.

<u>SECTION C</u> Polychlorinated Biphenyls (PCBs, as Aroclors) by SW-846, Method 8082

The following samples were analyzed and reported at extract dilutions ranging from 2x to 5,000x, resulting in corresponding increases in analyte RL values.

| Field Sample ID | <u>Lab ID</u> | Dilution |
|-----------------|---------------|----------|
| 1146D1-U | 4241 | 5x |
| 1146H1-U | 4243 | 2x |
| U-U | 4255 | 10x |
| U-L | 4256 | 10x |
| FD-1 | 4257 | 5000x |
| FD-2 | 4258 | 50x |

All samples were analyzed by single-column, single detector gas chromatography. Since the soil sample areas under consideration have been previously shown to exhibit the presence of Aroclor material, and review of the sample chromatograms provided reasonable pattern-match with standards, the presence of the reported positive Aroclors (1254 and 1260) may be presumed.

Positive results reported for Aroclors 1254 and 1260 were determined to have been quantitated using a shared peak at 8.92 minutes retention time (R.T.); this shared peak was identified as (Aroclor) 1254 'Peak 3' and as (Aroclor) 1260 'Peak 2'. Since at least three peaks for each discrete Aroclor are required per the method (8082A, Sect. 11.4.6.1), excluding this shared peak area from either Aroclor 1254 or 1260 does not provide adequate representation of either material. Based on the reviewer's discussions with the laboratory and client, it was determined as the most feasible alternative to qualify the positives for 1254 and 1260 as quantitatively estimated, with indication of potential high bias for each.

Therefore, all reported positive Aroclor results for AR-1254 and AR-1260 were flagged as 'NJ', to indicate presumptive presence at estimated quantitation value.

Overall data quality

Data quality was acceptable, incorporating applied data qualifiers as detailed in the accompanying QC and calibration summary forms, and discussed in the fraction-specific sections below.

Positive results for Aroclors 1254 and 1260 were qualified 'NJ', as presumptively present at estimated concentration.

Precision value between collocated samples 1146 L1-U and DUP31810 for Aroclor 1260 exceeded 50% RPD (at 75%). Reported results for Aroclor 1260 in both collocated samples were flagged as estimated, 'J', with indeterminate bias direction.

<u>SECTION D</u> Overall Recommendations

The results of the review and qualification process for the above analytical fractions and associated samples are summarized on the attached QC and Calibration summary tables for each specific analytical fraction, in order to facilitate the end-user's' review of these data.

Environmental Quality Associates, Inc.

Page 3 of 3

Very truly yours, Environmental Quality Associates, Inc.

Chris W. Taylor Vice President

/cwt Attachments

Environmental Quality Associates, Inc.

PCB ANALYSIS QC PARAMETER / QUALIFIER SUMMARY SW-846 Method 8082

| Client: | Malcolm Pirnie, Inc. | Project: | Flexo Site R.I. ; Seneca St. | Laboratory Project No.: | 10-1100A |
|---|---|---|--|--|---------------------|
| | | | | SDG No.: | 4241 |
| Review Level: | NYSDEC 'DUSR' | Laboratory; | PARADIGM Environmental Svcs. | | |
| HOLDING TIMES (N | YSDEC-ASP) | | | | |
| NON-AQUEOUS MAT | rix: | 10 DAYS MAX. VT | SR TO EXTRACTION / 40 DAYS MAX | | ALYSIS |
| | | | TRACTS MUST BE MAINTAINED AT | | |
| Non-aqueous samples | s were extracted within | 5 days of VTSR; al | I samples were analyzed within <u>3</u> days | of extraction. | |
| METHOD BLANKS Blank ID SOIL PB 03/24 | Date Extracted 03/24/10 | <u>Date Analyzed</u> 03/24/10 | <u>Matrix Analytes Presen</u> soil none | <u>it Conc., ppb</u> n/a | Action Level n/a |
| INSTRUMENT BLANK | <u>(S</u> | | | | |
| Injection logs indicated | f that instrument blank | s (solvent blanks / h | exane) were run following each CCV. | | |
| SURROGATE RECOV | /ERY | | | | |
| of Aroclors in the samp and were labeled as 'D The lab reported sever | oles. Therefore, surrog)' (diluted-out) by the la ral recoveries of surrog | ate recoveriesfor th boratory. No QA ac ate TCX (tetrachlor | t dílutions ranging from 10x to 5,000x, ese samples exhibited no quantifiable tion is applicable to these samples bas o-m-xylene) below lab-derived recover g internal-standard calibration; no QA | recoveries of surrogates sed on these dilutions. v limits, It is noted that th | i |
| MATRIX SPIKE / DUP | LICATE AR1242 | | QA Action AR 1242 was not detected in samples possibly due to matrix interference. No QA action was was warranted. | and recovered above lia | nits, |
| | | | | | |
| BLANK SPIKE (LCS) F | RECOVERY | | | | |
| BLANK SPIKE (LCS) F LCS recoveries were w | | | | | |

Howe Aroclors present (1254 ; 1260) exhibited reasonably close matches to respective standard materials, these Aroclors may be considered as presumptively present in the respective samples reported as positive,

QA Action: Positive results for Aroclors 1254 and 1260 are flagged 'NJ', as presumptively present at estimated concentration. The data user is referred to the DUSR narrative for further comments regarding data qualification.

| H, | FIELD DUPLICATE PR | RECISION | | | |
|----|--------------------|---------------------------|----------------------------|-----------------------|---|
| | AR1260, mg/Kg | <u>1146 L1-U</u> 0.148 | <u>DUP 31810</u> 0.0674 | <u>RPD. %</u> 74.8 | <u>QA Action</u> Flag results for AR1260 in samples 1146 L1-U and DUP 31810 as estimated 'J', with indeterminate bias direction. |

Α.

В,

C.

D.

Ε,

F,

G.

Client: Malcolm Pirnie, Inc.

Project: Flexo Site R.I.

Laboratory Project No.: <u>10-1 t00A</u> SDG No.: <u>4241</u>

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Review Level: <u>NYSDEC 'DUSR'</u>

Laboratory: PARADIGM Environmental Svcs.

A. INITIAL CALIBRATION

| CALIBRATION DATE : | 03/12/10 |
|------------------------|-----------------|
| Mean RSD ≤ 20%? | n/a |
| Lin Regression r>0.99? | yes |
| 2nd-order COD >0.99? | n/a |
| Associated samples : | All SDG samples |
| | |

B. CONTINUING CALIBRATIONS (CCV)

| CALIBRATION DATE : 03/24/10 03/24/10 03/25/10 03/25/10 03/25/10 03/26/10 03/26/10 03/2 FILE IDs : 002F1501.D 002F4001.D 002F6101.D 002F601.D 002F1801.D 002F0201.D 002F1801.D 002F0201.D 002F1801.D 002F0201.D | | CCV1 | CCV2 | CCV3 | CCV4 | CCV5 | CCV6 | CCV7 |
|--|---------------------------|------------|------------|------------|------------|------------|------|------------|
| FiLE IDs: 002F1501.D 002F4001.D 002F6101.D 002F0201.D 002F1801.D 002F1801.D 002F0201.D 002F1801.D 002F180 | CALIBRATION DATE : | 03/24/10 | 03/24/10 | 03/25/10 | 03/25/10 | | | 03/26/10 |
| TIME: 14:01 23:13 07:18 16:24 22:18 10:56 14 At start of sequence? Yes n/a n/a <td< td=""><td>FILE IDs :</td><td>002F1501.D</td><td>002F4001.D</td><td>002F6101.D</td><td>002F0201.D</td><td>002F1801.D</td><td>1</td><td>002F1101.0</td></td<> | FILE IDs : | 002F1501.D | 002F4001.D | 002F6101.D | 002F0201.D | 002F1801.D | 1 | 002F1101.0 |
| At start of sequence? Yes n/a Yes | TIME : | 14:01 | 23:13 | 07:18 | 16:24 | 22:18 | | 14:15 |
| After every 10 samples? n/a Yes Yes Yes Yes n/a n.a n.a <td></td> <td>Yes</td> <td>n/a</td> <td>n/a</td> <td>n/a</td> <td></td> <td></td> <td>n/a</td> | | Yes | n/a | n/a | n/a | | | n/a |
| At end of sequence? n/a n/a n/a n/a Yes [%D] ≤ 15? Yes Yes <td>After every 10 samples?</td> <td>n/a</td> <td>Yes</td> <td>Yes</td> <td>Yes</td> <td>Yes</td> <td></td> <td>n/a</td> | After every 10 samples? | n/a | Yes | Yes | Yes | Yes | | n/a |
| %D ≤15? Yes Yes Yes Yes Yes Yes Yes Yes Yes | At end of sequence? | n/a | n/a | n/a | n/a | n/a | | Yes |
| | | Yes | Yes | Yes | Yes | Yes | | Yes |
| No, list compounds ===> | f No, list compounds ===> | | | | | | | |
| | Affected Samples : | | | | | | | |

QA ACTION : n/a

C. See page 2 for Calibration regression / sample result verification

CALIBRATION SUMMARY SW846 METHOD 8082

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 Review Level:
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 Laboratory:
 PARADIGM Environmental Svcs.

C. SAMPLE RESULT VERIFICATION

| Calibration | Std. Conc. (ng/uL) | Area Response | | | | |
|-------------------------------|--------------------|---------------------------|-------------|------------|--|------------|
| Aroclor 1260, Peak 2 | 0.05 | 225.29709 | | | | |
| R.T. = 8.898 minutes | 0.10 | 445.55307 | | | | |
| | 0.25 | 1052.68762 | | | | |
| | 0.50 | 2038.37024 | | | | |
| | 0.75 | 3053.56128 | | | | |
| | 1.00 | 3915.38696 | | | | |
| SUMMARY OUTPUT | | | | | | |
| Regression St | atistics | | | | | |
| Multiple R | 0.999616561 | | | | | |
| R Square | 0.999233269 | | | | | |
| Adjusted R Square | 0.999041586 | | | | | |
| Standard Error | 45.86630721 | | | | | |
| Observations | 6 | | | | | |
| A 1/01 / 4 | | | | | | |
| ANOVA | | | | | | |
| Regression | df | SS | MS | F | Significance F | |
| Residual | 1 | 10966578.1 | 10966578.1 | 5212.9503 | 2.2051E-07 | |
| Fotal | 4 | 8414.87255 10974992.97 | 2103.718138 | | | |
| | 5 | 10374352.57 | | | ······································ | |
| | Coefficients | Standard Error | t Stat | P-value | Lower 95% | Upper 95% |
| ntercept | 61.26511529 | 30.3792338 | 2.016677434 | 0.1139283 | -23.0811597 | 145.611390 |
| K Variable 1 | 3910.666252 | 54.16377949 | 72.20076385 | 2.205E-07 | 3760.283492 | 4061.04901 |
| | | | | | | |
| Sample ID : U-U | | | | | eak at R.T. ≈ 8.92 | minutes |
| Conc. (ng/uL) = Response - II | | | Sample peak | | 3774.28955 | |
| | X variab | e | Report | ed ng/uL : | 0.948 | |
| | / variab | | | | | |
| Conc. (ng/uL) = | 3774.28955 | 61.26511529 | | | | |

Conc. (ng/uL) =

0.949

*Result verified ? yes

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