



INVENTUM ENGINEERING, PC

Corrective Measures Injection Program Work Plan

Brownfield Cleanup Program Site #C915208

275 Franklin Street

Buffalo, New York 14202

May 5, 2026

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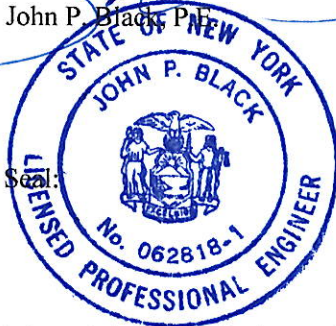
Engineering Certification

I, John. P. Black certify that I am currently a NYS registered professional engineer as defined in 6 NYCRR Part 375 and that this Corrective Measures Injection Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10) and that all activities were performed in full accordance with the DER-approved work plan and any DER-approved modifications.

Respectfully Submitted,

Inventum Engineering, P.C.

John P. Black, P.E.



Date:

May 5, 2024

License No:

062818-1

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1 Introduction

On behalf of Buffalo Development Corporation, (BDC), Inventum Engineering, P.C. (Inventum) has prepared this Corrective Measures Injection Program Work Plan for the 275 Franklin Street & 432 Pearl Street Brownfield Cleanup Program (BCP) Sites (BCP Site Nos. C915208 & C915237). In a letter dated August 3, 2023, the New York State Department of Environmental Conservation (NYSDEC) required BDC to develop a work plan to evaluate corrective measures to further treat chlorinated volatile organic compounds (VOCs) in groundwater on the BCP Site.

A Corrective Measures Investigation Work Plan (CMIWP) was approved by NYSDEC on May 28, 2024. The CMIWP identified data gaps that precluded an understanding of the characteristics at the site that control the efficacy of potentially applicable remedial approaches to manage residual contamination on the BCP Site. The largest data gap was the lack of any soil data characterizing VOCs in the saturated soils on the BCP Site, specifically, the potential presence of VOCs between 12- and 40-feet below ground surface (bgs). Borings were advanced in accordance with the CMIWP to resolve the data gap and gather data to support an evaluation of need for additional corrective measures to further treat chlorinated VOCs on the BCP Site. A Corrective Measures Investigation Data Report detailing the results of the soil boring/sampling program was submitted on August 21, 2025. NYSDEC issued a letter on August 27, 2025, requesting a CMIWP to treat residual VOCs in groundwater on the BCP Site based on the data presented in the 2025 data report.

This CMIWP includes a program of targeted injections of colloidal sulfidated zero-valent iron (SMZVI) within a defined residual “source” area and along the perimeter of the BCP Site.



2 Background

2.1 Site Background

In October 2006, BDC entered into a Brownfield Cleanup Agreement (BCA) with NYSDEC to investigate and remediate 275-277 Franklin Street and 279 Franklin Street, an approximate 0.26-acre property located in Buffalo, New York. Later, 267 Franklin Street and 432 Pearl Street, approximately 0.7 acres combined, were incorporated into the “432 Pearl Street Site” under BCP Site Number C915237. Both properties are in the County of Erie, New York and encompasses tax parcel numbers 111.38-2-22, 111.38-2-23, 111.38-2-20.1, and 111.38-2-4.1 per Erie County Tax Map records. The Sites are bounded by a restaurant and surface parking lot to the north, Pearl Street to the east, a mixed-use building to the south, and Franklin Street to the west (Figure 2-1).

2.2 Site Investigation and Remediation History

Remedial Investigation (RI) activities were completed in November 2006, December 2006, and January 2007 for both BCP Sites (Ref. 5). In summary, the primary contaminants of concern in soil and groundwater on the BCP Sites were identified as tetrachloroethene (PCE) and/or its chemical break down products, trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE), trans 1,2-dichloroethene (trans-1,2-DCE), and vinyl chloride.

Interim Remedial Measures (IRMs) were implemented by BDC to address on-site soil and groundwater on the 275 Franklin Street Site impacted by VOCs identified during RI activities (Ref. 3). The IRMs were implemented from summer 2008 through fall 2009 and are documented in the October 2017 Final Engineering Report (FER; Ref. 8).

2.2.1 Soil Vapor Extraction System

A Soil Vapor Extraction (SVE) system was installed on the 275 Franklin Street Site and operated continuously from December 8, 2008, until February 2009 when it was temporarily shut down due to winter weather. The system was restarted on March 11, 2009, and ran continuously through September 2009. Post-IRM soil samples collected on September 17, 2009, were compared to pre-IRM data from April 2008 and RRSCOs. The February 2009 data showed significant reductions of VOCs in unsaturated soils to well below RRSCOs and Unrestricted Use SSCOs. Toxicity Characteristic Leaching Procedure (TCLP) analysis also verified that the remediated soils were not characteristically hazardous.

2.2.2 In-Situ Groundwater Treatment

In August 2008, in-situ enhanced bioremediation of VOCs in groundwater was performed via injection of hydrogen release compound (HRC) into 14 delivery points at 275 Franklin and 21 delivery points at 279 Franklin. Following HRC injection, a groundwater sampling program, consisting of eight monitoring events conducted between October 2008 and June 2012, was implemented to evaluate the effectiveness of the in-situ groundwater treatment program. The data generally showed lower trending residual concentrations of total VOCs in monitoring wells on both BCP Sites except for samples from shallow well MW-5 (located on the 275 Franklin Street Site), which continued to contain relatively high residual VOC concentrations.

2.2.3 Active Sub-Slab Depressurization System

Although not part of the IRM Work Plan, NYSDEC installed an active sub-slab depressurization (ASD) system within the 267 Franklin Street apartment building (on the 432 Pearl Street Site) prior to BDC's ownership of that parcel (Ref. 4). Two separate ASD systems (one on the south side and one on the north side) were designed and installed. The ASD is maintained and monitored in accordance with the



NYSDEC-approved Site Management Plan (Ref. 2). Monitoring and reporting are detailed in the annual PRRs.

2.2.4 Final Remedial Actions

Final remedial actions were completed at the BCP Site from April 2014 to December 2016 and are described more fully in the October 2017 FER (Ref. 8).

The following is a summary of the Remedial Actions performed at the BCP Site:

- Maintenance of the existing cover system to allow for continued commercial use of the Site.
- Injection of zero valent iron (ZVI) and nutrients into Site groundwater in April 2014 to enhance both abiotic and biological reductive processes.
- Injection of a chemical oxidant into Site groundwater and saturated “smear zone” interval in March and April 2016 to destroy organic contaminants (Ref. 6).
- Excavation of source area soil/fill to a depth of approximately 12 feet bgs in December 2016 with application of a chemical oxidant to excavation bottom to address residual impact prior to backfilling (Ref. 7). The area was backfilled with NYSDEC approved overburden soil followed by placement of demarcation fabric then clean imported sand and stone. The asphalt cover system was reinstalled to match surrounding grade.
- Execution and recording of an Environmental Easement to restrict groundwater and land use and prevent future exposure to any contamination remaining at the Site.
- Development and implementation of a SMP for long term management of remaining contamination as required by the Environmental Easement, which includes plans for: (1) Institutional and Engineering Controls, (2) monitoring, (3) operation and maintenance, and (4) reporting.

NYSDEC issued a Certificate of Completion (COC) for 275 Franklin Street Site on December 27, 2017, and on December 28, 2017, for the 432 Pearl Street Site.

2.3 Existing Conditions

2.3.1 Groundwater

The groundwater data continues to show concentrations of VOCs above Class GA GWQSs (Table 1; Figure 2-2)¹. Groundwater concentration trends (post-2016 excavation through November 2025) for each monitoring well sampled semi-annually as part of routine site management are shown in Appendix A². PCE is decreasing overall since the 2016 source area excavation in four (4) of the onsite monitoring wells (PZ-5, PZ-11, PZ-12, and MW-5R) and increasing in the other four (4) onsite monitoring wells (PZ-6, PZ-13, PZ-14, and PZ-4R). PCE concentrations remain above the Class GA GWQS of 5 micrograms per liter (ug/L) in all the onsite monitoring well samples.

¹ Includes November 2025 groundwater sampling data which was provided to NYSDEC in an e-mail dated February 12, 2026, in advanced of a conference call between Inventum, BDC, and NYSDEC on February 13, 2026. The validated November 2025 will be reported to NYSDEC in accordance with the SMP in the next PRR.

² Please note the trendlines maintain the Table #'s as typically presented in the annual PRRs.



More recent groundwater trends for the last four (4) years (April 2022 through November 2025) are shown in Appendix B. PCE concentrations show a recent increasing trend in four (4) monitoring wells (PZ-6, PZ-5, MW-5R, and PZ-13).

Both the overall and recent trends are indicative of residual PCE mass remaining in saturated soil and groundwater on the BCP Site, which was confirmed by the laboratory data collected and field observations made as part of the Corrective Measures Investigation (Ref. 13).

2.3.2 Soil

The general composition of the overburden on the BCP Site is well documented from historical site investigations and validated by the findings during the Corrective Measures Investigation (Ref. 13). Fill soils are present ranging in depth between 2 and 10 feet below ground surface (bgs). The underlying native soils are interpreted as glaciolacustrine sand and silt with intermittent silty clay lenses. Running sands were noted by the drilling contractor during the Corrective Measures Investigation in several of the borings generally at intervals between 20 to 26 feet bgs. Limestone bedrock is present at depths generally between 47 and 55 feet bgs. Unconfined groundwater exists in the native overburden between depths of 10 and 12 feet bgs. Cross sections of the BCP Site geologic and hydrogeologic conditions are provided in Figures 2-3 through 2-6.

Concentrations of VOCs above restricted residential use and protection of groundwater SCOs remain in subsurface soils on the BCP Site (Table 2; Figure 2-7; Ref. 13). The maximum concentration of PCE detected during the Corrective Measures Investigation was 37 milligrams per kilogram (mg/kg) in DPB-03, which represents a 99.9-percent decrease compared to the maximum PCE concentration (92,000 mg/kg) detected prior to the 2016 source area excavation (Ref. 8). The bulk of the remaining residual “source” area PCE mass as defined by PCE concentrations above the restricted residential SCO (19 mg/kg) and elevated photoionization detector (PID) readings appears to be distributed in a thin 2-foot interval between 12 and 14-feet bgs centered in and around the footprint of the former dry-cleaning facility (Figure 2-7). The distal areas outside of the residual “source” area are generally defined by PCE concentrations below or slightly above the protection of groundwater SCO (1.3 mg/kg) and comparatively lower or non-detect PID readings (Figures 2-3 through 2-7).

The residual “source” area and the portion of the distal area along the hydraulically downgradient BCP Site boundary are the targets for the proposed injection program.



3 Corrective Measures Injection Program

In Situ Chemical Reduction (ISCR) was selected as the most appropriate technology to address the remaining residual concentrations of VOCs in saturated soil and groundwater on the BCP Site. ISCR was selected as the most viable technology based on a number of supporting factors:

- Compliance with Remedial Action Objectives: ISCR is an established and well documented technology that has been shown to effectively reduce PCE and associated degradation products (TCE, 1,2-cis-DCE, 1,2-trans-DCE, and vinyl chloride) from initial concentration levels within the same order of magnitude as those remaining on the BCP Site. Specifically, ZVI has been shown to readily reduce PCE and TCE to ethene and ethane via direct chemical reduction.
- Implementability: In-situ injections via direct-push methods were successfully implemented on the BCP Site as a component of the historical IRMs. In-Situ injections, particularly ZVI, can be completed in a short time frame and eliminate the need for long-term operations and maintenance that other potential viable technologies (ex. pump and treat and air sparging) may require. The injection footprint is small compared to other viable technologies that would require significant ground intrusive site work and limit the ongoing reuse of the site as a commercial parking facility. Waste generation is also significantly reduced compared to other viable technologies that would require significant infrastructure (ex. extraction wells, conveyance piping/trenches, treatment system structures) to complete.
- Effectiveness: ZVI is effective in both the near and long term. The proposed ZVI injections are designed for both rapid PCE reduction and enhancing long-term biological degradation. The proposed ZVI differs from the historical IRMs in its composition and the timing of the injections. The proposed ZVI is described in the following section of this work plan, and the historical injections preceded the source area removal excavation.

3.1 Technology Description

Sulfidated-Mico Zero Valent Iron (S-MZVI) is manufactured by Regenesis located in San Clemente, California. The S-MZVI differs from the ZVI previously injected at the BCP Site in April 2014 in both design and application. The previous ZVI application was designed primarily to create a reducing environment in the groundwater to enhance/support abiotic and biological degradation (Ref. 8). Although some VOC reductions were documented following application, the practicality of the 2014 ZVI injections were limited as saturated soils within the source area had not yet been excavated.

The proposed S-MZVI injections are designed for both rapid PCE reduction and enhancing long-term biological degradation. The formulation of the S-MZVI compared to the ZVI previously injected at the site also allows for a typically lower application pressure and should reduce the potential for daylighting of the material that affected the ability to deliver the April 2014 application and was documented in the FER (Ref. 8).

3.2 Injection Scope of Work

Prior to injection activities, underground utilities within the proposed injection areas will be cleared by contacting UDig NY (online or 811). Although not anticipated based on prior ground intrusive activities



on the BCP Site, modifications to the number and/or location of injection points may be necessary if underground utilities are identified.

Injection rods will be advanced to the proposed terminal depth using direct-push technology to allow for either top-down or bottom-up injection of the S-MZVI. Pressure, flow rate, and overall volume will be monitored and recorded for each injection location and interval. Simultaneous injections at multiple locations may be performed. Inventum will continually monitor the injection points and surrounding area for daylighting during the injection activities. If daylighting is observed, Inventum may (1) reduce the injection interval and/or injection pressure/flow rate; (2) abandon the injection location and advance a new injection point; or (3) additional volume may be injected into previously planned points. All daylighted material will be cleaned from the ground surface, containerized, and disposed of offsite.

The completed injection boreholes will be backfilled with hydrated bentonite and/or grout and the asphalt surface patched to match the existing grade. All injection locations and ground surface elevations will be surveyed by a New York State licensed surveyor following completion of the work.

The S-MZVI will be delivered to the BCP Site on pallets in 300-gallon poly totes. An inline injection system will be utilized to handle and deliver the S-MZVI into the subsurface. The inline system is designed to mix and provide the S-MVZI/water solution at the specific design specifications for each injection area/point via a positive displacement pump (Appendix E). Water will be obtained from a nearby fire hydrant.

Distribution monitoring will be conducted intermittently in the immediate area of the injections using bailers, a water quality meter, and water level indicator. Representative monitoring of depth to water, temperature, conductivity, dissolved oxygen (DO), and oxidation-reduction potential (ORP) will be conducted before, during, and after the reagent application at select monitoring wells.

All sitework will adhere to the Health and Safety Plan (HASP) included within the established SMP. A Job Hazard Analysis (JHA) specific to handling/injections of the S-MZVI will be provided by the reagent vendor prior to site mobilization. S-MZVI is provided in a liquid form and can be safely and readily handled with typical Level D personal protective equipment (PPE). A safety data sheet (SSD) for the material is provided in Appendix D.

3.2.1 Residual Source Area

The residual source area is approximately 1,800 square feet (Figure 3-1).

The proposed injection area is spatially defined by the current PCE groundwater concentrations in monitoring wells MW-5R (2,200 ug/L) and PZ-4R (1,600 ug/L) and PCE concentrations in the saturated soil at boring locations DPB-01 (24 mg/kg from 12 to 14 feet bgs), DPB-03 (37 mg/kg from 12 to 14 feet bgs), and DPB-09 (22 mg/kg from 12 to 14 feet bgs). The concentrations of PCE in groundwater in this area are one to two orders of magnitude greater than the surrounding distal area. Similarly, concentrations of PCE in the saturated soil and PID readings are elevated compared to the surrounding distal area.

The proposed injection interval is vertically defined by the PCE concentrations in the saturated soil at the boring locations noted above and PID readings recorded during boring installation (Figures 2-3 through 2-6).

S-MZVI will be injected from 10 feet bgs to 30 feet bgs on an approximate 8 foot by 8-foot grid within the residual source area (28 injection points). A total of 4,000 pounds of S-MZVI will be applied across the residual source area (approximately 30 gallons of solution per foot).



3.2.2 Perimeter Distal Area

The perimeter distal area encompasses approximately 2,500 square feet along the western and southern boundary (Figure 3-1). The proposed injection interval is vertically defined by the PCE concentrations in the saturated soil, and PID readings recorded during installation (Figure 2-3 through 2-6) which were generally non-detect or below 1 part per million (ppm).

S-MZVI will be injected from 10 feet bgs to 20 feet bgs on an approximate 11-foot spacing with a 5-foot offset between locations. within the perimeter distal area (15 injection points). A total of 2,000 pounds of S-MZVI will be applied across the perimeter distal area (approximately 45 gallons of solution per foot).

3.3 Permits and Approvals

The following permits and approvals will be obtained prior to completing any injection activities:

- United States Environmental Protection Agency (USEPA) Inventory of Injection Wells Form 7520-16 will be filed with the USEPA Underground Injection Control Section.
- Buffalo Water Board hydrant tap/use permit.

Copies of all permits will be provided to NYSDEC as a component of the 15-day advanced notice of ground-intrusive activities required by the BCP Site Excavation Work Plan.

3.4 Performance Monitoring

Performance monitoring of the injection program will be conducted concurrently with the routine semi-annual monitoring conducted in accordance with the SMP. In addition to the routine analysis of Target Compound List (TCL) VOCs (EPA Method 8260) and field water quality measurements (pH, temperature, turbidity, conductivity, DO, and ORP), the following analysis will be conducted on groundwater samples collected from monitoring wells PZ-6, PZ-12, PZ-14, and MW-5R during the April 2026 (pre-injection) and November 2026 and April 2027 (post-injection) events:

- Sulfate, Nitrate, Alkalinity, Chloride – EPA Methods 300 Series
- Total Organic Carbon – EPA Method 415.1 or EPA Method 9060
- Total and Dissolved Iron – EPA Method 6010

The performance monitoring data will be incorporated into the annual PRRs.

3.5 Investigation-Derived Waste

No soil or groundwater requiring offsite disposal are anticipated to be generated as part of the Corrective Measures Injection Program.

Decontamination water will be placed in 55-gallon drums and disposed of as non-hazardous waste. Non-impacted, disposable materials (including empty poly totes) may be recycled or disposed of offsite as general refuse.



4 Schedule and Reporting

4.1 Schedule

The proposed injection program is anticipated to take 10 to 15 days to complete. The following is a tentative project schedule and is subject to weather and contractor/material availability:

- Corrective Measures Injection Work Plan Review/Approval – March 31, 2026, to June 1, 2026
- Contracting and Permitting – June 1, 2026, to September 1, 2026
- Begin Injections – October 1, 2026

4.2 Reporting

The following will be submitted to NYSDEC during and following completion of the Corrective Measures Injection Program:

- Daily field reports will be submitted to NYSDEC and the New York State Department of Health (NYSDOH) during all field activities associated with the injection program. The daily report will be submitted via e-mail to the NYSDEC Project Manager (PM) by the end of the following day unless a different submittal schedule is approved by the NYSDEC PM. Daily reports will include (at minimum):
 - Any update on progress made during the reporting day;
 - Locations of work/site activities identified on a site map;
 - Quantities and descriptions of material imported to and exported from the site (if applicable);
 - Summary of any and all complaints with relevant details (names, phone numbers);
 - Summary of CAMP findings, including exceedances;
 - Explanation of notable site conditions/findings; and
 - Deviations from the approved work plan.
- Corrective Measures Completion Report (CCR) – A CCR will be submitted details work completed as part of the Corrective Measures Injection Program and will be certified by a NYS Licensed PE. The CCR will be submitted within 60 days of completion of the scope of work including receipt and data validation of the first post-injection groundwater monitoring event, which is anticipated to be completed in November 2026. The CCR will include (at minimum):
 - Documentation of injection points (interval depths, injection pressure/flow rates, reagent volume, time elapsed, and surfacing occurrences);
 - Analysis of pre- and post-injection groundwater data;
 - Documentation of all material imported or exported from the site;
 - CAMP data;
 - Photographic log
- Periodic Review Report – Long-term performance evaluation of the Corrective Measures Injection Program will be incorporated into the annual PRRs.



5 References

1. New York State Department of Environmental Conservation. *DER-10/ Technical Guidance for Site Investigation and Remediation*. May 3, 2013.
2. Benchmark Environmental Engineering & Science, PLLC. *Site Management Plan, 275 Franklin Street Site, BCP Site No. C915208 and 432 Pearl Street Site, BCP Site No. C915237, Buffalo, New York*. July 2017
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Tables





Table 1
Summary of Post-Excavation Groundwater Analytical Results
275 Franklin 432 Pearl Street Sites
BCP Sites No. C915208 C915237
Buffalo, NY

Monitoring Location & Sample Date		Parameter ¹										
		TCL Volatile Organic Compounds (ug/L)										
		2-Butanone (MEK)	Carbon disulfide	Chloroform	1,1-Dichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Methylene chloride	Tetrachloroethene	Trichloroethene	Vinyl chloride	Total TCL cVOCs
GWQS ²		50	--	7	5	5	5	5	5	5	2	--
Shallow Overburden Wells												
PZ-4	12/1-12/6/16	ON-SITE EXCAVATION										
	01/23/17	< 39	< 20	< 14	< 3.4	58	< 14	< 14	1,000	52	< 1.4	1,110
	04/24/17	< 39	< 20	< 14	< 3.4	52	< 14	< 14	1,200	44	< 1.4	1,296
	11/12/18	< 19	< 10	< 7	< 1.7	17 J	< 7	< 7	1,400	23	< 0.71	1,423
PZ-4R	04/05/19	< 19	< 10	< 7	< 1.7	38	< 7	< 7	1,200 D	24 D	< 0.71	1,262
	11/20/19	< 19	< 10	< 7	< 1.7	21 D J	< 7	< 7	1,100 D	21 D	< 0.71	1,142
	04/01/20	< 19	< 10	< 7	< 1.7	29 D	< 7	< 7	1,100 D	23 D	< 0.71	1,152
	11/13/20	< 39	< 20	< 14	< 3.4	36 D J	< 14	< 14	2,000 D	37 D	< 1.4	2,073
	04/01/21	< 19	< 10	< 7	< 1.7	35 D J	< 7	< 7	1,600 D	26 D	< 0.71	1,661
	11/02/21	< 19	< 10	< 7	< 1.7	35 D2	< 7	< 7	2,100 D	36 D2	< 0.71	2,171
	04/05/22	< 19	< 10	< 7	< 1.7	37 D	< 7	< 7	1,400 D	24 D	< 0.71	1,461
	11/10/22	< 19	< 10	< 7	< 1.7	37 D	< 7	< 7	1,600 D	37 D	< 0.71	1,674
	04/04/23	< 19	< 10	< 7	< 1.7	11 J D	< 7	< 7	860 D	14 D	< 0.71	885
	11/08/23	< 19	< 10	< 7	< 1.7 UJ	11 J	< 7	< 7	1800	22	< 0.71	1,833
	04/16/24	< 19	< 10	< 7	< 1.7	16 J	< 7	< 7	1200	15 J	< 0.71	1,231
	11/05/24	< 19	< 10	< 7	< 1.7	11 J	< 7	< 7	1400	22	< 0.71	1,433
	04/15/25	< 19	< 10	< 7 UJ	< 1.7 UJ	12 J	< 7	< 7	910	12 J	< 0.71	934
	11/05/25	< 19	< 10	< 7	< 1.7	16 J	< 7	< 7	1600	22	< 0.71	1,638



Table 1
Summary of Post-Excavation Groundwater Analytical Results
275 Franklin 432 Pearl Street Sites
BCP Sites No. C915208 C915237
Buffalo, NY

Monitoring Location & Sample Date		Parameter ¹										
		TCL Volatile Organic Compounds (ug/L)										
		2-Butanone (MEK)	Carbon disulfide	Chloroform	1,1-Dichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Methylene chloride	Tetrachloroethene	Trichloroethene	Vinyl chloride	Total/ TCL cVOCs
GWQS ²		50	--	7	5	5	5	5	5	5	2	--
PZ-5	12/1-12/6/16	ON-SITE EXCAVATION										
	01/24/17	< 19	< 10	< 7	< 1.7	< 7	< 7	< 7	880 D	2.7 J	< 0.71	883
	04/24/17	< 19	< 10	< 7	< 1.7	28	< 7	< 7	740	3.4 J	< 0.71	771
	11/12/18	< 7.8	< 4	< 2.8	< 0.68	< 2.8	< 2.8	< 2.8	340 J	< 0.7	< 0.28	340
	04/05/19	< 3.9	< 2	6.5 D	< 0.34	< 1.4	< 1.4	< 1.4	160 D	0.62 J D	< 0.14	167
	11/20/19	< 4.8	< 2.5	< 1.8	< 0.42	< 1.8	< 1.8	< 1.8	220 D	< 0.44	< 0.18	220
	04/01/20	< 1.9	< 1	0.89 J	< 0.17	1.1 J	< 0.7	< 0.7	280 D	1.1	< 0.07	283
	11/13/20	< 3.9	< 2	2.3 D J	< 0.34	< 1.4	< 1.4	< 1.4	180 D	< 0.35	< 0.14	182
	04/01/21	< 1.9	< 1	5.2	< 0.17	< 0.7	< 0.7	< 0.7	160	< 0.18	< 0.07	165
	11/02/21	< 3.9	< 2	2.6 D J	< 0.34	3.2 D J	< 1.4	< 1.4	400 D	2.2 D	< 0.14	408
	04/05/22	< 1.9	< 1	3.6	< 0.17	< 0.7	< 0.7	< 0.7	190	0.21 J	< 0.07	194
	11/10/22	< 3.9	< 2	1.4 D	< 0.34	< 1.4	< 1.4	< 1.4	260 D	< 0.35	< 0.14	261
	04/04/23	< 3.9	< 2	< 1.4	< 0.34	< 1.4	< 1.4	< 1.4	210 D	< 0.35	< 0.14	210
	11/08/23	< 3.9	< 2	< 1.4	< 0.34 UJ	< 1.4	< 1.4	< 1.4	190	0.3 J	< 0.14	190
	04/16/24	< 3.9	< 2	< 1.4	< 0.34 UJ	< 1.4 UJ	< 1.4	< 1.4	170	< 0.35 UJ	< 0.14	170
	11/05/24	< 4.8	< 2.5	< 1.8	< 0.42	8.9	< 1.8	< 1.8	290	5.1 J	< 0.18	304
	04/15/25	< 4.8	< 2.5	< 1.8 UJ	< 0.42 UJ	< 1.8 UJ	< 1.8	< 1.8	340	1.8 J	< 0.18	342
11/05/25	< 3.9	< 2	< 1.4	< 0.34	2.2 J	< 1.4	< 1.4	200	1.7 J	< 0.14	204	



Table 1
Summary of Post-Excavation Groundwater Analytical Results
275 Franklin 432 Pearl Street Sites
BCP Sites No. C915208 C915237
Buffalo, NY

Monitoring Location & Sample Date		Parameter ¹										
		TCL Volatile Organic Compounds (ug/L)										
		2-Butanone (MEK)	Carbon disulfide	Chloroform	1,1-Dichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Methylene chloride	Tetrachloroethene	Trichloroethene	Vinyl chloride	Total TCL cVOCs
GWQS ²		50	--	7	5	5	5	5	5	5	2	--
PZ-6	12/1-12/6/16	ON-SITE EXCAVATION										
	01/23/17	< 19	< 10	< 7	< 1.7	< 7	< 7	< 7	500	8.2	< 0.71	508
	04/24/17	< 1.9	< 1	< 0.7	< 0.17	5.8	< 0.7	< 0.7	46	1.3	< 0.07	53
	11/12/18	< 4.8	< 2.5	< 1.8	< 0.42	2.4 J	< 1.8	< 1.8	250	2.7	< 0.18	255
	04/05/19	< 1.9	< 1.0	2.4 J	< 0.17	1.5 J	< 0.7	< 0.7	200	2.7	< 0.07	207
	11/20/19	< 3.9	< 2.0	< 1.8	< 0.42	2.1 D J	< 1.8	< 1.8	170 D	1.8 D	< 0.18	174
	04/01/20	< 1.9	< 1.0	1.2 J	< 0.17	1.3 J	< 0.7	< 0.7	190 D	2.2	< 0.07	195
	11/13/20	< 3.9	< 2.0	1.6 D J	< 0.34	< 1.4	< 1.4	< 1.4	210 D	1.7 D	< 0.14	213
	04/01/21	< 1.9	< 1.0	4.8	< 0.17	< 0.7	< 0.7	< 0.7	66	0.31 J	< 0.07	71
	11/02/21	< 3.9	< 2.0	2.8 D J	< 0.34	1.4 D J	< 1.4	< 1.4	280 D	2.2 D	< 0.14	286
	04/05/22	< 1.9	< 1.0	2.2 J	< 0.17	< 0.7	< 0.7	< 0.7	190	0.97	< 0.07	193
	11/10/22	< 4.8	< 2.5	< 1.8	< 0.42	< 1.8	< 1.8	< 1.8	360 D	2.9 D	< 0.18	363
	04/04/23	< 1.9	< 1.0	0.97 J	< 0.17	< 0.7	< 0.7	< 0.7	170	0.76	< 0.07	172
	11/08/23	< 1.9	< 1.0	< 1.4	< 0.17	< 0.7	< 0.7	< 0.7	170	0.6 J	< 0.07	171
	04/16/24	< 1.9	< 1	< 0.7	< 0.34 UJ	< 0.7 UJ	< 0.7	< 0.7	120	0.44 J	< 0.07	120
	11/05/24	< 1.9	< 1	< 0.7	< 0.17	< 0.7	< 0.7	< 0.7	230	1.1 J	< 0.07	231
	04/15/25	<9.7 UJ	< 5	< 3.5 UJ	< 0.84 UJ	5.8 J	< 3.5	< 3.5	720 J	4 J	< 0.36	740
	11/05/25	<9.7	<5	<3.5	<0.84	4.6 J	<3.5	<3.5	830	< 3.3	<0.36	838
PZ-11	12/1-12/6/16	ON-SITE EXCAVATION										
	01/24/17	< 190	< 100	< 70	< 17	< 70	< 70	< 70	5,500	< 18	< 7.1	5,500
	04/24/17	< 190	< 100	< 70	< 17	< 70	< 70	< 70	5,600	< 18	< 7.1	5,600
	11/12/18	< 19	< 10	< 7	< 1.7	18 J	< 7	< 7	1,300	14	< 0.71	1,332
	04/05/19	< 78	< 40	< 28	< 6.8	< 28	< 28	< 28	4,100 D	21 D	< 2.8	4,121
	11/20/19	< 4.8	< 2.5	< 1.8	< 0.42	7.7 D	< 1.8	< 1.8	440 D	4 D	< 0.18	452
	04/01/20	< 19	< 10	< 7	< 1.7	< 7	< 7	< 7	1,000 D	2.5 J D	< 0.71	1,003
	11/13/20	< 39	< 20	< 14	< 3.4	< 14	< 14	< 14	3,000 D	6.6 J D	< 1.4	3,007
	04/01/21	< 39	< 20	< 14	< 3.4	< 14	< 14	< 14	2,400 D	7.3 J D	< 1.4	2,407
	11/02/21	< 3.9	< 2.0	2.6 D J	< 0.34	< 1.4	< 1.4	< 1.4	350 D	0.96 J D	< 1.4	354
	04/05/22	< 19	< 10	< 7	< 1.7	7.5 J D	< 7	< 7	1,500 D	9.2 D	< 0.71	1,517
	11/10/22	< 19	< 10	< 7	< 1.7	7.5 J D	< 7	< 7	800 D	5.2 D	< 0.71	813
	04/04/23	< 19	< 10	< 7	< 1.7	11 J D	< 7	< 7	1,200 D	5.3 D	< 0.71	1,216
	11/08/23	< 19	< 10	< 7	< 1.7 UJ	< 14	< 7	< 7	1900	3.7 J	< 0.71	1,904
	04/16/24	< 19	< 2.5 UJ	< 1.8	< 1.7 UJ	< 1.8	< 1.8	1.8 UJ	440	1.2	< 0.18 UJ	441
	11/05/24	< 19	< 10	< 7	< 1.7	13 J	< 7	< 7	1300	8.7 J	< 0.71	1,322
	04/15/25	< 39	< 20	< 14 UJ	< 3.4 UJ	< 14 UJ	< 14	< 14	1800	8.1 J	< 1.4	1,808
	11/05/25	<7.8	<4	<2.8	<0.68	11 J D	<2.8	<2.8	350	< 4.9	<0.28	372



Table 1
Summary of Post-Excavation Groundwater Analytical Results
275 Franklin 432 Pearl Street Sites
BCP Sites No. C915208 C915237
Buffalo, NY

Monitoring Location & Sample Date		Parameter ¹										
		TCL Volatile Organic Compounds (ug/L)										
		2-Butanone (MEK)	Carbon disulfide	Chloroform	1,1-Dichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Methylene chloride	Tetrachloroethene	Trichloroethene	Vinyl chloride	Total TCL cVOCs
GWQS ²		50	--	7	5	5	5	5	5	5	2	--
PZ-12	12/1-12/6/16	ON-SITE EXCAVATION										
	01/24/17	< 48	< 25	< 18	< 4.2	26 J	< 18	< 18	2,500	8.8 J	< 1.8	2,535
	04/24/17	< 39	< 20	< 14	< 3.4	14 J	< 14	< 14	1,900	7.8 J	< 1.4	1,922
	11/12/18	< 19	< 10	< 7	< 1.7	< 7	< 7	< 7	830 J	< 1.8	< 0.71	830
	04/05/19	< 3.9	< 2	9 D	< 0.34	3.2 J D	< 1.4	< 1.4	250 D	0.91 J D	< 0.14	263
	11/20/19	< 39	< 20	< 14	< 3.4	< 14	< 14	< 14	3,600 D	7.9 J D	< 1.4	3,608
	04/01/20	< 19	< 10	< 7	< 1.7	< 7	< 7	< 7	1,000 D	3.3 J D	< 0.71	1,003
	11/13/20	< 1.9	< 1	1.4 J	< 0.17	< 0.7	< 0.7	< 0.7	130	0.68	< 0.07	132
	04/01/21	< 9.7	< 5	< 3.5	< 0.84	< 3.5	< 3.5	< 3.5	1,100 D2	2.4 J D	< 0.36	1,102
	11/02/21	< 4.8	< 2.5	2.2 J D	< 0.42	5.5 J D	< 1.8	< 1.8	410 D	3.4 D	< 0.18	421
	04/05/22	< 9.7	< 5	< 3.5	< 0.84	< 3.5	< 3.5	< 3.5	500 D	2.6 D	< 0.36	503
	11/10/22	< 9.7	< 5	< 3.5	< 0.84	< 3.5	< 3.5	< 3.5	680 D	2.2 J D	< 0.36	682
	04/04/23	< 48	< 25	< 18	< 4.2	< 18	< 18	< 18	2,800 D	7.5 J D	< 1.8	2,808
	11/08/23	< 48	< 25	0.82 J	< 4.2 UJ	< 18	< 18	< 18	150	0.77	< 1.8	152
	04/16/24	< 1.9	< 1	< 0.7	< 1.7 UJ	< 0.7 UJ	< 0.7	< 0.7	160	0.53 J	< 0.07	161
	11/05/24	< 1.9	< 1	0.7 J	< 0.17	2.3 J	< 0.7	< 0.7	41	0.24 J	< 0.07	44
	04/15/25	< 19	< 10	< 7 UJ	< 1.7 UJ	< 7 UJ	< 7	< 7	810	4.3 J	< 0.71	814
	11/05/25	<7.8	<4	<2.8	<0.68	<2.8	<2.8	<2.8	280	<0.7	<0.28	280
PZ-13	12/1-12/6/16	ON-SITE EXCAVATION										
	01/24/17	< 3.9	< 2	< 1.4	< 0.34	50	5.0	< 1.4	79	19	18	171
	04/24/17	< 19	< 10	< 7	< 1.7	500	10 J	< 7	14	20	110	654
	11/12/18	< 1.9	< 1	< 0.7	< 0.17	< 0.7	0.73 J	< 0.7	16	3.6	32	52
	04/05/19	< 3.9	< 2	< 1.4	1.8 J D	280 D	1.8 J D	< 1.4	93 D	76 D	53 D	506
	11/20/19	< 1.9	< 1	< 0.7	0.23 J	52	6.6	< 0.70	13	14	38	124
	04/01/20	< 1.9	< 1	< 0.7	< 0.17	44	1.5 J	< 7	21	9.6	8.9	85
	11/13/20	< 1.9	< 1	< 0.7	< 0.17	45	0.75 J	< 0.7	30	7.2	4.9	88
	04/01/21	< 1.9	< 1	< 0.7	< 0.17	28	1.2 J	< 0.7	25	9.7	3.9	68
	11/02/21	< 1.9	< 1	< 0.7	< 0.17	72	2.3 J	< 0.7	43	9.7	10	137
	04/05/22	< 1.9	< 1	< 0.7	< 0.17	70	1.7 J	< 0.7	12	10	4.3	98
	11/10/22	< 1.9	< 1	< 0.7	< 0.17	47	15	< 0.7	72	17	18	169
	04/04/23	< 1.9	< 1	< 0.7	< 0.17	17	2.2 J	< 0.7	41	11	3.7 J+	75
	11/08/23	< 1.9	< 1	< 0.7	< 0.17 UJ	33	12	< 0.7	170	12	7.6 J	235
	04/16/24	< 1.9	< 1	< 0.7	< 1.7	40 J	9.7	0.7 J	100	17 J	3.6	171
	11/05/24	< 3.9	< 2	< 1.4	< 0.34	83	10	< 1.4	210	11 J	21	335
	04/15/25	< 4.8	< 2.5	< 1.8 UJ	0.52 J	240 J	9.8	< 1.8	69	10 J	17	347
	11/05/25	<3.9	<2	<1.4	0.44 J	160	7.3	<1.4	91	7.6	24	290



Table 1
Summary of Post-Excavation Groundwater Analytical Results
275 Franklin 432 Pearl Street Sites
BCP Sites No. C915208 C915237
Buffalo, NY

Monitoring Location & Sample Date		Parameter ¹										
		TCL Volatile Organic Compounds (ug/L)										
		2-Butanone (MEK)	Carbon disulfide	Chloroform	1,1-Dichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Methylene chloride	Tetrachloroethene	Trichloroethene	Vinyl chloride	Total TCL cVOCs
GWQS ²		50	--	7	5	5	5	5	5	5	2	--
PZ-14	12/1-12/6/16	ON-SITE EXCAVATION										
	01/24/17	< 1.9	< 1	< 0.7	0.34 J	290 D	14	< 0.7	4.8	12	130	451
	04/24/17	< 7.8	< 4	< 2.8	0.68 J	180	8.5 J	< 2.8	4.7	140	140	473
	11/12/18	< 1.9	< 1	< 0.7	< 0.17	50	1.8 J	< 0.7	32	9.8	20	114
	04/05/19	< 3.9	< 2	< 1.4	0.5 J D	170 D	4.2 J D	< 1.4	150 D	32 D	30 D J	387
	11/20/19	< 1.9	< 1	0.71 J	0.34 J	100	4.2	< 0.70	33	12	35	185
	04/01/20	< 4.8	< 2.5	< 1.8	0.74 J D	340 D	5.4 J D	< 1.8	98 D	28 D	24 D	496
	11/13/20	< 9.7	< 5	< 3.5	1.1 J D	580 D	10 J D	< 3.5	110 D	29 D	82 D	812
	04/01/21	< 1.9	< 1	< 0.7	0.36 J	150	2.1 J	< 0.7	170	38	6.3	367
	11/02/21	< 3.9	< 2	< 1.4	0.79 J D	390 D	4.9 J D	< 1.4	190 D	29 D	35 D	650
	04/05/22	< 3.9	< 2	< 1.4	0.4 J D	130 D	3 J D	< 1.4	200 D	20 D	8 D	361
	11/10/22	< 7.8	< 4	< 2.8	< 0.68	320 D	3.1 J D	< 2.8	470 D	35 D	9.6 D	838
	04/04/23	< 9.7	< 5	< 3.5	< 0.84	180 D	< 3.5	< 3.5	550 D	24 D	1.4 J D	755
	11/08/23	< 9.7	< 5	< 3.5	1.1 J-	650	5.3 J	< 3.5	540	34	8.2	1,239
	04/16/24	< 9.7	< 5	< 3.5	< 0.84	370 J	< 3.5	< 3.5	560	27 J	6.2	963
	11/05/24	< 7.8	< 4	< 2.8	1.1 J	530	4.1 J	< 2.8	340	33 J	8.5	917
	04/15/25	< 3.9	< 2	< 1.4 UJ	0.48 J	310 J	1.5 J	< 1.4	320	11 J	0.52 J	644
	11/05/25	< 9.7	< 5	< 3.5	0.88 J	470	<3.5	<3.5	330	29 J	0.92 J	831
MW-5R	12/1-12/6/16	ON-SITE EXCAVATION										
	01/23/17	< 39	< 20	< 14	< 3.4	< 14	< 14	< 14	990	20	< 1.4	1,010
	04/24/17	< 97	< 50	< 35	< 8.4	160	< 35	< 35	3,600	55	< 3.6	3,815
	11/12/18	< 19	< 10	< 7	< 1.7	270	< 7	< 7	740	150	< 0.71	1,160
	04/05/19	< 39	< 20	< 14	< 3.4	270 D	< 14	< 14	1,900 D	300 D	< 1.4	2,470
	11/20/19	< 7.8	< 4	< 2.8	< 0.68	160 D	< 2.8	< 2.8	380 D	120 D	< 0.28	660
	04/01/20	< 19	< 10	< 7	< 1.7	170 D	< 7	< 7	980 D	180 D	< 0.71	1,330
	11/13/20	< 9.7	< 5	< 3.5	< 0.84	380 D	9.5 J D	< 3.5	460 D	140 D	< 0.36	990
	04/01/21	< 9.7	< 5	< 3.5	< 0.84	280 D	5.1 J D	< 3.5	1,000 D	210 D	< 0.36	1,495
	11/02/21	< 9.7	< 5	< 3.5	< 0.84	360 D	4.9 J D	< 3.5	750 D	150 D	< 0.36	1,265
	04/05/22	< 9.7	< 5	< 3.5	< 0.84	230 D	< 3.5	< 3.5	790 D	180 D	< 0.36	1,200
	11/10/22	< 7.8	< 4	< 2.8	< 0.68	160 D	< 2.8	< 2.8	580 D	65 D	< 0.28	805
	04/04/23	< 9.7	< 5	< 3.5	< 0.84	200 D	< 3.5	< 3.5	710 D	140 D	< 0.36	1,050
	11/08/23	< 9.7	< 5	< 3.5	< 0.84	300 D	3.6 DJ	< 3.5	790 D	130 D	< 0.36	1,224
	04/16/24	< 3.9	< 2	< 1.4	< 1.4	69	1.5 J	< 1.4	190	38	< 0.14	299
	04/16/24	< 9.7	< 5	< 3.5	< 0.84	210 J	4.6 J	< 3.5	570	120 J	< 0.36	905
	11/05/24	< 39	< 20	< 14	< 3.4	790	18 J	< 14	1,900	340 J	< 1.4	3048
	04/21/25	< 48	< 25	< 18	< 4.2	570	< 18	< 18	3,100	420	< 1.8	4090
11/05/25	<48	<25	<18	<4.2	790	24 J	<18	2,200	300	<1.8	3314	



Table 1
Summary of Post-Excavation Groundwater Analytical Results
 275 Franklin 432 Pearl Street Sites
 BCP Sites No. C915208 C915237
 Buffalo, NY

Monitoring Location & Sample Date		Parameter ¹										
		TCL Volatile Organic Compounds (ug/L)										
		2-Butanone (MEK)	Carbon disulfide	Chloroform	1,1-Dichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Methylene chloride	Tetrachloroethene	Trichloroethene	Vinyl chloride	Total TCL cVOCs
GWQS ²		50	--	7	5	5	5	5	5	5	2	--
Off-Site NYSDEC Wells (S = shallow, D = deep) ³												
MW-21S Decommissioned 2018	08/18/08	HRC INJECTION										
	05/28/09	< 5	< 1	0.75 J	<1.0	< 1	< 1	< 1	< 1	< 1	< 1	0
	06/07/11	< 10	< 5	< 5	<5.0	< 5	< 5	<5.0	< 5	< 5	< 5	0
MW-21D Decommissioned 2018	08/18/08	HRC INJECTION										
	05/28/09	< 5	< 1	1.4 J	<1.0	< 1	< 1	< 1	< 1	< 1	< 1	0
	06/07/11	< 10	< 5	< 5	<5.0	< 5	< 5	< 5	< 5	< 5	< 5	0
MW-22S Decommissioned 2018	08/18/08	HRC INJECTION										
	05/28/09	< 5	< 1	< 1	<1.0	< 1	< 1	< 1	< 1	< 1	< 1	0
	06/07/11	< 10	< 5	< 5	<5.0	< 5	< 5	< 5	< 5	< 5	< 5	0
MW-22D Decommissioned 2018	08/18/08	HRC INJECTION										
	05/28/09	< 5	< 1	0.92 J	<1.0	< 1	< 1	< 1	< 1	< 1	< 1	0
	06/07/11	< 10	< 5	< 5	<5.0	< 5	< 5	< 5	< 5	< 5	< 5	0
MW-23S	12/1-12/6/16	ON-SITE EXCAVATION										
	01/23/17	< 19	< 10	< 7	< 1.7	7.1 J	< 7	< 7	470	10	< 0.71	487
	04/24/17	< 19	< 10	< 7	< 1.7	26	< 7	< 7	660	15	< 0.71	701
	11/12/18	< 9.7	< 5	< 3.5	< 0.84	< 3.5	< 3.5	< 3.5	590	3	< 0.36	593
	04/05/19	< 4.8	< 2.5	2.1 J D	< 0.42	< 1.8	< 1.8	< 1.8	310 D	1.1 J D	< 0.18	313
	11/20/19	< 4.8	< 2.5	2.4 J D	< 0.42	5.4 J	< 1.8	< 1.8	230 D	1.2 D	< 0.18	239
	04/01/20	< 9.7	< 5	< 3.5	< 0.84	< 3.5	< 3.5	< 3.5	820 D	3.5 D	< 0.36	824
	11/13/20	< 3.9	< 2	< 1.4	< 0.34	1.6 J D	< 1.4	< 1.4	330 D	1.7 D	< 0.14	333
	04/01/21	< 3.9	< 2	1.5 J D	< 0.34	1.9 J D	< 1.4	< 1.4	340 D	2.7 D	< 0.14	346
	11/02/21	< 19	< 10	< 7	< 1.7	< 7	< 7	< 7	990 D	4.6 D J	< 0.71	995
	04/05/22	< 9.7	< 5	< 3.5	< 0.84	< 3.5	< 3.5	< 3.5	700 D	3.5 D	< 0.36	704
	11/10/22	< 9.7	< 5	< 3.5	< 0.84	4 J D	< 3.5	< 3.5	870 D	2.8 D	< 0.36	877
	04/04/23	< 9.7	< 5	< 3.5	< 0.84	< 3.5	< 3.5	< 3.5	590 D	2.7 D	10 D	603
	11/08/23	< 9.7	< 5	< 3.5	< 0.84	< 3.5	< 3.5	< 3.5	570	1.4 J	< 0.36	571
	04/16/24	< 9.7	< 5	< 3.5	< 0.84	< 3.5 UJ	< 3.5	< 3.5	620	2.3 J	< 0.36	622
	11/05/24	< 9.7	< 5	< 3.5	< 0.84	< 3.5	< 3.5	< 3.5	500	2.1 J	< 0.36	502.1
	04/15/25	< 9.7	< 5	< 3.5 UJ	< 0.84 UJ	< 3.5 UJ	< 3.5	< 3.5	380	2.4 J	< 0.36	382.4
	11/05/25	<3.9	<2	<1.4	<0.34	3.4 J	<1.4	<1.4	180	2	<0.14	185.4



Table 1
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275 Franklin 432 Pearl Street Sites
BCP Sites No. C915208 C915237
Buffalo, NY

Monitoring Location & Sample Date		Parameter ¹										
		TCL Volatile Organic Compounds (ug/L)										
		2-Butanone (MEK)	Carbon disulfide	Chloroform	1,1-Dichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Methylene chloride	Tetrachloroethene	Trichloroethene	Vinyl chloride	Total TCL c/VOCs
GWQS ²		50	--	7	5	5	5	5	5	5	2	--
MW-23D ⁵	12/1-12/6/16	ON-SITE EXCAVATION										
	11/17/20	< 1.3	< 0.19	< 0.34	< 0.29	< 0.81	< 0.9	< 0.44	1.4	< 0.46	< 0.9	1.4
	04/05/21	< 1.3	< 0.19	< 0.34	< 0.29	< 0.81	< 0.90	< 0.44	1.6	< 0.46	< 0.90	1.6
	11/01/21	< 1.3	< 0.19	< 0.34	< 0.29	< 0.81	< 0.90	< 0.44	1.2	< 0.46	< 0.90	1.2
	04/06/22	< 1.6	< 1.4	0.3 J	< 0.14	< 0.15	< 0.17	< 0.23	0.72 J	< 0.19	< 0.21	1.02
	11/09/22	14 J D	< 7.2	1.8 J D	< 0.71	2.8 J D	< 0.84	< 1.2	500 D	< 49	< 1	518.6
	04/06/23	< 20	< 5	0.31 J	< 1	< 1	< 1	< 5	0.7 J	< 1	< 2	1.01
	11/07/23	< 1.7	< 1.6	0.34 J	< 0.14	0.14 J	< 0.17	< 0.18	0.47 J	< 0.17	< 0.24	0.81
	04/14/25	< 1.5	< 1.6	0.34 J	< 0.15	< 0.19	< 0.19	< 0.17	0.53 J	< 0.16	< 0.22	5.07
	11/05/25	< 1.5	< 1.6	0.37 J	< 0.15	< 0.19	< 0.19	< 0.17	0.72 J	< 0.16	< 0.22	1.09
MW-24S	12/1-12/6/16	ON-SITE EXCAVATION										
	01/23/17	< 190	< 100	< 70	< 17	< 70	< 70	< 70	9,000	35 J	< 7.1	9,035
	04/24/17	< 390	< 200	< 140	< 34	< 140	< 140	< 140	9,300	< 35	< 14	9,300
	11/12/18	< 39	< 20	< 14	< 3.4	< 14	< 14	< 14	3,900	5.7 J	< 1.4	3,906
	04/05/19	< 19	< 10	25 D	< 1.7	66 D	< 7	< 7	890 D2	29 D	< 0.71	1,010
	11/20/19	< 19	< 10	7.6 J D	< 1.7	< 7	< 7	< 7	1,100 D	< 1.8	< 0.71	1,108
	04/01/20	< 19	< 10	10 J D	< 1.7	15 J D	< 7	< 7	990 D	3.8 J D	< 0.71	1,019
	11/13/20	< 19	< 10	< 7	< 1.7	12 J D2	< 7	< 7	2,000 D	13 D2	< 0.71	2,025
	04/01/21	< 78	< 40	< 28	< 6.8	33 J D	< 28	< 28	6,100 D	15 J D	< 2.8	6,148
	11/02/21	< 19	< 10	< 7	< 1.7	7.6 J D2	< 7	< 7	3,500 D	6 D2	< 0.71	3,514
	04/05/22	< 9.7	< 5	< 3.5	< 0.84	< 3.5	< 3.5	< 3.5	820 D	1.2 J D	< 0.36	821
	11/10/22	< 78	< 40	< 28	< 6.8	45 J D	< 28	< 28	4,200 D	< 7.0	< 2.8	4,245
	04/04/23	< 9.7	< 5	< 3.5	< 0.84	< 3.5	< 3.5	< 3.5	640 D	1.6 J D	< 0.36	642
	11/08/23	< 9.7	< 5	< 3.5	< 0.84 UJ	98	< 3.5	< 3.5	1200 J	25	< 0.36	1,323
	04/16/24	< 78	< 40	< 28	< 6.8	< 28	< 28	< 28	4,200	< 7.0	< 2.8	4200
	11/05/24	< 39	< 20	< 14	< 3.4	22 J	< 14	< 14	1600 J	5.5 J	5.9 J	1633
	04/15/25	< 97	< 50	< 35 UJ	< 8.4 UJ	72 J	< 35	< 35	4,400	46 J	6.4 J	4524
	11/05/25	2 J	<1	<0.7	<0.17	5.1	<0.7	<0.7	78	0.76 J D	0.65 J	101



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275 Franklin 432 Pearl Street Sites
BCP Sites No. C915208 C915237
Buffalo, NY

Monitoring Location & Sample Date		Parameter ¹										
		TCL Volatile Organic Compounds (ug/L)										
		2-Butanone (MEK)	Carbon disulfide	Chloroform	1,1-Dichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Methylene chloride	Tetrachloroethene	Trichloroethene	Vinyl chloride	Total TCL cVOCs
GWQS ²		50	--	7	5	5	5	5	5	5	2	--
MW-24D	12/1-12/6/16	O N - S I T E E X C A V A T I O N										
	01/23/17	< 1.9	< 1	< 0.7	0.19 J	48	< 0.7	< 0.7	4.0	2.2	< 0.07	54
	04/24/17	< 1.9	< 1	< 0.7	0.3 J	83	< 0.7	< 0.7	2.7	4.9	< 0.07	91
	11/12/18	< 7.8	< 4	< 2.8	< 0.68	250	< 2.8	< 2.8	450	120	< 0.28	820
	02/18/19	< 13	< 1.9	< 3.4	< 2.9	200	< 9.0	9.3 J	420	110	< 9.0	730
	04/05/19	< 9.7	< 5	< 3.5	< 0.84	290 D	< 3.5	< 3.5	480 D	130 D	< 0.36	900
	11/20/19	< 1.9	< 1	< 0.7	0.58	170	1.2 J	< 0.7	180 D	66	< 0.07	418
	04/01/20	< 3.9	< 2	< 1.4	0.73 J D	220 D	1.4 J D	< 1.4	270 D	95 D	< 0.14	587
	11/13/20	< 1.9	< 1	< 0.7	0.49 J	150	0.97 J	< 0.7	180 D	73	< 0.07	404
	11/17/20	< 13	< 1.9	< 3.4	< 2.9	180	< 9	< 4.4	320	120	< 9	620
	04/01/21	< 3.9	< 2	< 1.4	0.45 J D	140 D	< 1.4	< 1.4	220 D	77 D	< 0.14	437
	04/05/21	< 11	< 1.5	< 2.7	< 2.3	200	< 7.2	< 3.5	310	120	< 7.2	630
	11/02/21	< 3.9	< 2	< 1.4	0.51 J D	290 D	1.8 J D	< 1.4	110 D	53 D	< 0.14	455
	04/05/22	< 3.9	< 2	< 1.4	0.49 J D	210 D	< 1.4	< 1.4	79 D	36 D	0.58 D J	326
	11/10/22	< 3.9	< 2	< 1.4	0.43 J D	230 D	1.4 J D	< 1.4	34 D	14 D	0.94 D J	281
	04/04/23	< 1.9	< 1	< 0.7	0.46 J	120	0.82 J	< 0.7	50	18	1.5	191
	11/08/23	< 1.9	< 1	< 0.7	0.34 J-	140	0.8 J	< 0.7	31	8.5	0.72 J	181
	04/16/24	< 3.9	< 2	< 1.4	0.74 J	250 J	1.4 J	< 1.4	8.8	6.5 J	6.9	274
	11/05/24	< 3.9	< 2	< 1.4	0.58 J	200	< 1.4	< 1.4	25	17 J	9.4	252
	04/15/25	< 3.9	< 2	< 1.4 UJ	0.39 J	150 J	< 1.4	< 1.4	54	27 J	7.2	239
	11/05/25	1.9 J	<1	<0.7	<0.17	<0.7	<0.7	<0.7	0.52	<0.18	<0.7	17



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		TCL Volatile Organic Compounds (ug/L)										
		2-Butanone (MEK)	Carbon disulfide	Chloroform	1,1-Dichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Methylene chloride	Tetrachloroethene	Trichloroethene	Vinyl chloride	Total TCL cVOCs
GWQS ²		50	--	7	5	5	5	5	5	5	2	--
MW-25S	12/1-12/6/16	ON-SITE EXCAVATION										
	03/01/17	<5.3	<0.76	< 1.4	< 1.2	190 F1	< 3.6	< 1.8	56	5.2	36	287
	05/11/17	< 5.3	< 0.76	< 1.4	< 1.2	310	< 3.6	< 1.8	46	5.8	< 3.6	362
	02/18/19	< 26	< 3.8	< 6.8	< 5.8	880	< 18	< 21	1300	210	< 18	2390
	11/17/20	< 11	< 1.5	< 2.7	< 2.3	110	< 7.2	< 3.5	370	32	< 7.2	512
	04/05/21	< 11	< 1.5	3.3 J	< 2.3	580	< 7.2	< 3.5	560	25	7.2 J	1,176
	11/01/21	< 11	< 1.5	< 2.7	< 2.3	290 F1 J	< 7.2	< 3.5	420 F1 J	19	< 7.2	729
	04/06/22	58 J	< 7.2	< 0.84	< 0.71	300	3.6 J	< 1.2	270	24	3.4 J	659
	11/09/22	< 6.5	< 5.8	1.5 J D	0.68 J D	380 D	2.9 J D	< 0.94	260 D	49 D	< 0.83	694
	04/06/23	21 J D	< 20	< 8	< 4	210 D	1.5 J D	< 20	220 D	24 D	< 8	477
	11/07/23	< 1.7	< 1.6	0.67 J	0.44 J	260	2.4	< 0.18	240	34	0.59 J	538
	04/14/25	<2.9	<3.1	0.34 J	<0.31	150	1.5 J	<0.33	180	27	0.9 J	364
11/05/25	< 2.9	< 3.1	0.86 J	< 0.31	43	0.58 J	< 0.33	190	7.8	<0.43	242	
MW-26S	12/1-12/6/16	ON-SITE EXCAVATION										
	03/01/17	< 5.3	< 0.76	< 1.4	< 1.2	110	<3.6	<1.8	4500 D	85	<3.6	4,695
	05/11/17	< 110	< 15	< 27	< 23	130	< 72	< 35	4500	76 J	< 72	4,706
	02/18/19	< 66	< 9.5	< 17	< 15	140	< 45	< 55	2900	100 J	< 45	3,140
	11/17/20	< 13	< 1.9	< 3.2	< 2.9	28	< 9	< 4.4	770 F1	20	< 9	818
	04/05/21	< 26	< 3.8	< 6.8	< 5.8	38	< 18	< 8.8	860	36	< 18	934
	11/01/21	< 26	< 3.8	< 6.8	< 5.8	< 16	< 18	< 8.8	920	19 J	< 18	939
	04/06/22	110 J	< 14	< 1.7	< 1.4	13	< 1.7	< 2.3	440	17	< 2.1	580
	11/09/22	< 16	< 14	< 1.7	< 1.4	13 D	< 1.7	< 2.3	600 D	10 D	< 2.1	623
	04/06/23	< 80	< 20	1.1 J D	< 4	43 D	< 4	< 20	290 D	14 D	< 8	348
	11/07/23	< 17	< 16	< 1.4	< 1.4	43 D	< 1.7	< 1.8	610 D	13 D	< 2.4	666
	04/14/25	< 58	< 62	< 5.5	< 6.1	32 J	< 7.5	< 6.6	3300	26 J	< 8.7	3,358
11/05/25	<15	<16	<1.4	<1.5	11	<1.9	<1.7	1200	7.4 J	<2.2	1,218	



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Monitoring Location & Sample Date		Parameter ¹										
		TCL Volatile Organic Compounds (ug/L)										
		2-Butanone (MEK)	Carbon disulfide	Chloroform	1,1-Dichloroethene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Methylene chloride	Tetrachloroethene	Trichloroethene	Vinyl chloride	Total TCL c/VOCs
GWQS ²		50	--	7	5	5	5	5	5	5	2	--
MW-27S	12/1-12/6/16	ON-SITE EXCAVATION										
	05/11/17	< 1.3	< 0.19	0.47 J	< 0.29	< 0.81	< 0.9	< 0.44	1.7	< 0.46	< 0.9	2.2
	11/17/20	< 1.3	< 0.19	0.62 J	< 0.29	< 0.81	< 0.9	< 0.44	25	0.62 J	< 0.9	26.2
	04/05/21	< 1.3	< 0.19	1.4	< 0.29	< 0.81	< 0.90	< 0.44	6.6	< 0.46	< 0.9	8.0
	11/01/21	< 1.3	< 0.19	2.7	< 0.29	< 0.81	< 0.90	< 0.44	6.5	< 0.46	< 0.9	9.2
	04/06/22	< 1.6	< 1.4	2.1	< 0.14	< 0.15	< 0.17	< 0.23	5.3	< 0.19	< 0.21	7.4
	11/09/22	< 1.6	< 1.4	4.3	< 0.14	< 0.15	< 0.17	< 0.23	6.4	< 0.19	< 0.21	10.7
	04/06/23	< 20	< 5	2.4	< 1	< 1	< 1	< 5	4.1	< 1	< 2	6.5
	11/07/23	< 1.7	< 1.6	1.9 J	< 0.14	< 0.14	< 0.14	< 0.18	5.1	< 1	< 0.24	7
	04/14/25	< 1.5	< 1.6	0.66 J	< 0.15	< 0.19	< 0.19	< 0.17	5.3	< 0.16	< 0.22	8.56
	11/05/25	< 1.5	< 1.6	0.69 J	< 0.15	< 0.19	< 0.19	< 0.17	5.6	< 0.16	< 0.22	6.29

Notes:

- Only those parameters detected above their specific GWQS at a minimum of one sample location are presented. Some additional parameters were detected but not included due to low concentrations and sporadic detection.
- Groundwater Quality Standard (GWQS) per NYSDEC Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1.
- Groundwater data for off-site wells MW-23D, MW-25S, -26S, and -27S were obtained from NYSDEC.
- Field parameter results were not provided by the NYSDEC.
- BM in consultation with NYSDEC believe MW-23D data collected November 9, 2022 is actually MW-23S data after discrepancy in purge log and depth to bottom measurement.
- Field duplicate sample recorded.

Definitions:

- < 0.19 = Parameter not detected above laboratory method detection limit.
- NA = Sample not analyzed for parameter.
- "--" = No groundwater quality standard available.
- J = Estimated value; result is less than the sample quantitation limit but greater than zero.
- J+ = the analyte was positively identified; the associated numerical value is an estimated quantity that may be biased high.
- b = Analyte was detected in the associated blank as well as in the sample. Value is above the action level for consideration as being external contamination.
- B = Indicates a value greater than or equal to the instrument detection limit, but less than the quantitation limit.
- D = Concentration of analyte was quantified from a diluted analysis. Numerical value indicates level of dilution completed.
- F1 = MS and/or MSD recovery exceeds control limits.
- NS = Not sampled due to car parked over well; several attempts to sample were made over a 2-week period.

Result exceeds Groundwater Quality Standard (GWQS) per NYSDEC Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1



Table 2
Corrective Measures Investigation Sampling Results
275 Franklin Street and 432 Pearl Street BCP Sites

ANALYTE	SAMPLE ID:				DPB01-14-07302024	DPB01-18-07302024	DPB01-26-07312024	DPB01-52-07312024	DPB02-14-08012024	DPB02-18-08012024	DPB02-26-08012024	DPB03-14-07242024	DPB03-18-07242024	DPB03-26-07242024	DPB03-40-07252024																					
	LAB ID:				L2442784-01	L2442784-02	L2443113-01	L2443113-02	L2443364-01	L2443364-02	L2443364-03	L2441774-01	L2441774-02	L2441774-03	L2441929-01																					
	COLLECTION DATE:				7/30/2024	7/30/2024	7/31/2024	7/31/2024	8/1/2024	8/1/2024	8/1/2024	7/24/2024	7/24/2024	7/24/2024	7/25/2024																					
	BORING ID:				DPB-01																															
	SAMPLE DEPTH (BGS):				12-14'	16-18'	24-26'	50-52'	12-14'	16-18'	24-26'	12-14'	16-18'	24-26'	40-42'																					
	SAMPLE MATRIX:				SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL																				
	Commercial	Restricted Residential	Residential	Protection of Ground Water Standard																																
(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)																																	
VOLATILE ORGANICS (EPA 8260) (mg/kg)																																				
1,1,1-Trichloroethane	500	100	100	0.68	<0.0094	U	<0.00017	U	<0.00016	U	<0.00016	U	<0.00015	U	<0.00017	U	<0.0096	U	<0.00016	U	<0.0092	U	<0.00014	U	<0.0091	U	<0.00014	U	<0.0091	U	<0.00014	U				
1,1,2,2-Tetrachloroethane					<0.0094	U	<0.00017	U	<0.00016	U	<0.00016	U	<0.00015	U	<0.00017	U	<0.0095	U	<0.00016	U	<0.0091	U	<0.00014	U	<0.0091	U	<0.00014	U	<0.0091	U	<0.00014	U				
1,1,2-Trichloroethane					<0.015	U	<0.00027	U	<0.00025	U	<0.00025	U	<0.00024	U	<0.00027	U	<0.015	U	<0.00026	U	<0.00026	U	<0.015	U	<0.00026	U	<0.015	U	<0.00023	U	<0.015	U	<0.00023	U		
1,1-Dichloroethane	240	26	19	0.27	<0.0082	U	<0.00015	U	<0.00014	U	<0.00014	U	<0.00014	U	<0.00014	U	<0.0083	U	<0.00014	U	<0.0083	U	<0.008	U	<0.00014	U	<0.008	U	<0.00012	U	<0.008	U	<0.00012	U		
1,1-Dichloroethene	500	100	100	0.33	<0.013	U	<0.00024	U	<0.00022	U	<0.00023	U	<0.00023	U	<0.00024	U	<0.014	U	<0.00023	U	<0.014	U	<0.00023	U	<0.013	U	<0.0002	U	<0.013	U	<0.0002	U	<0.013	U	<0.0002	U
1,2,3-Trichlorobenzene					<0.018	U	<0.00033	U	<0.0003	U	<0.0003	U	<0.00031	U	<0.00029	U	<0.00032	U	<0.018	U	<0.00031	U	<0.018	U	<0.00031	U	<0.018	U	<0.00028	U	<0.018	U	<0.00028	U		
1,2,4-Trichlorobenzene					<0.015	U	<0.00028	U	<0.00026	U	<0.00026	U	<0.00026	U	<0.00027	U	<0.00027	U	<0.016	U	<0.00026	U	<0.016	U	<0.00026	U	<0.016	U	<0.00023	U	<0.016	U	<0.00023	U		
1,2-Dibromo-3-chloropropane					<0.056	U	<0.001	U	<0.00094	U	<0.00095	U	<0.00096	U	<0.00089	U	<0.001	U	<0.057	U	<0.00097	U	<0.055	U	<0.00097	U	<0.055	U	<0.00086	U	<0.055	U	<0.00086	U		
1,2-Dibromoethane					<0.016	U	<0.00028	U	<0.00026	U	<0.00026	U	<0.00027	U	<0.00025	U	<0.00028	U	<0.016	U	<0.00027	U	<0.016	U	<0.00027	U	<0.015	U	<0.00024	U	<0.015	U	<0.00024	U		
1,2-Dichlorobenzene	500	100	100	1.1	<0.0082	U	<0.00015	U	<0.00014	U	<0.00014	U	<0.00014	U	<0.00013	U	<0.00014	U	<0.0083	U	<0.00014	U	<0.0079	U	<0.00014	U	<0.0079	U	0.00016	J	<0.0083	U	0.00016	J		
1,2-Dichloroethane	30	3.1	2.3	0.02	<0.014	U	<0.00026	U	<0.00024	U	<0.00024	U	<0.00025	U	<0.00023	U	<0.00026	U	<0.015	U	<0.00025	U	<0.014	U	<0.00025	U	<0.014	U	<0.00022	U	<0.014	U	<0.00022	U		
1,2-Dichloropropane					<0.0071	U	<0.00013	U	<0.00012	U	<0.00012	U	<0.00012	U	<0.00011	U	<0.00012	U	<0.0072	U	<0.00012	U	<0.0069	U	<0.00012	U	<0.0069	U	<0.00011	U	<0.0069	U	<0.00011	U		
1,3-Dichlorobenzene	280	49	17	2.4	<0.0084	U	<0.00015	U	<0.00014	U	<0.00014	U	<0.00014	U	<0.00013	U	<0.00015	U	<0.0085	U	<0.00014	U	<0.0081	U	<0.00014	U	<0.0081	U	<0.00013	U	<0.0081	U	<0.00013	U		
1,4-Dichlorobenzene	130	13	9.8	1.8	<0.0097	U	<0.00017	U	<0.00016	U	<0.00016	U	<0.00016	U	<0.00015	U	<0.00017	U	<0.0098	U	<0.00017	U	<0.0094	U	<0.00017	U	<0.0094	U	<0.00015	U	<0.0094	U	<0.00015	U		
1,4-Dioxane	130	13	9.8	0.1	<2	U	<0.036	U	<0.033	U	<0.033	U	<0.034	U	<0.031	U	<0.035	U	<2	U	<0.034	U	<1.9	U	<0.034	U	<1.9	U	<0.03	U	<1.9	U	<0.03	U		
2-Butanone	500	100	100	0.12	<0.12	U	<0.0022	U	<0.0021	U	<0.0021	U	<0.0021	U	<0.002	U	<0.0022	U	<0.13	U	<0.0022	U	<0.12	U	<0.0022	U	<0.12	U	<0.0019	U	<0.12	U	<0.0019	U		
2-Hexanone					<0.067	U	<0.0012	U	<0.0011	U	<0.0011	U	<0.0011	U	<0.001	U	<0.0012	U	<0.068	U	<0.0012	U	<0.065	U	<0.0012	U	<0.065	U	<0.001	U	<0.065	U	<0.001	U		
4-Methyl-2-pentanone					<0.072	U	<0.0013	U	<0.0012	U	<0.0012	U	<0.0012	U	<0.0011	U	<0.0013	U	<0.074	U	<0.0012	U	<0.07	U	<0.0012	U	<0.07	U	<0.0011	U	<0.07	U	<0.0011	U		
Acetone	500	100	100	0.05	<0.27	U	<0.0049	U	<0.0046	U	0.006	J	0.0067	J	<0.0043	U	<0.0048	U	<0.28	U	<0.0047	U	<0.26	U	<0.0047	U	<0.26	U	0.0057	J	<0.26	U	0.0057	J		
Benzene	44	4.8	2.9	0.06	<0.0094	U	<0.00017	U	0.00061	J	<0.00016	U	<0.00016	U	0.00066	J	0.0002	J	<0.0095	U	<0.00016	U	<0.0091	U	<0.00016	U	<0.0091	U	<0.00014	U	<0.0091	U	<0.00014	U		
Bromochloromethane					<0.012	U	<0.00021	U	<0.00019	U	<0.00019	U	<0.0002	U	<0.00018	U	<0.0002	U	<0.012	U	<0.0002	U	<0.011	U	<0.0002	U	<0.011	U	<0.00018	U	<0.011	U	<0.00018	U		
Bromodichloromethane					<0.0062	U	<0.00011	U	<0.0001	U	<0.0001	U	<0.0001	U	<0.00011	U	<0.0063	U	<0.00011	U	<0.00011	U	<0.006	U	<0.00011	U	<0.006	U	<0.00009	U	<0.006	U	<0.00009	U		
Bromoform					<0.014	U	<0.00025	U	<0.00023	U	<0.00023	U	<0.00024	U	<0.00022	U	<0.00025	U	<0.014	U	<0.00024	U	<0.014	U	<0.00024	U	<0.014	U	<0.00021	U	<0.014	U	<0.00021	U		
Bromomethane					<0.033	U	<0.00059	U	<0.00055	U	<0.00055	U	<0.00055	U	<0.00052	U	<0.00055	U	<0.033	U	<0.00057	U	<0.032	U	<0.00057	U	<0.032	U	<0.0005	U	<0.032	U	<0.0005	U		
Carbon disulfide					<0.26	U	<0.0046	U	<0.0043	U	<0.0043	U	<0.0044	U	<0.004	U	<0.0046	U	<0.26	U	<0.0044	U	<0.25	U	<0.0044	U	<0.25	U	<0.0039	U	<0.25	U	<0.0039	U		
Carbon tetrachloride	22	2.4	1.4	0.76	<0.013	U	<0.00023	U	<0.00022	U	<0.00022	U	<0.00022	U	<0.00023	U	<0.013	U	<0.00022	U	<0.013	U	<0.00022	U	<0.013	U	<0.00022	U	<0.013	U	<0.00022	U	<0.013	U		
Chlorobenzene	500	100	100	1.1	<0.0072	U	<0.00013	U	<0.00012	U	<0.00012	U	<0.00012	U	<0.00011	U	<0.00013	U	<0.0073	U	<0.00012	U	<0.007	U	<0.00012	U	<0.007	U	<0.00011	U	<0.007	U	<0.00011	U		
Chloroethane					<0.026	U	<0.00046	U	<0.00043	U	<0.00043	U	<0.00043	U	<0.0004	U	<0.00045	U	<0.026	U	<0.00044	U	<0.025	U	<0.00044	U	<0.025	U	<0.00039	U	<0.025	U	<0.00039	U		
Chloroform	350	49	10	0.37	<0.0079	U	<0.00014	U	0.00015	J	<0.00013	U	<0.00013	U	<0.00012	U	0.00015	J	<0.008	U	0.00028	J	<0.0077	U	<0.00012	U	<0.0077	U	<0.00012	U	<0.0077	U	<0.00012	U		
Chloromethane					<0.053	U	<0.00095	U	<0.00088	U	<0.00088	U	<0.00089	U	<0.00083	U	<0.00094	U	<0.054	U	<0.00091	U	<0.051	U	<0.00091	U	<0.051	U	<0.0008	U	<0.051	U	<0.0008	U		
cis-1,2-Dichloroethene	500	100	59	0.25	0.29	J	<0.00018	U	<0.00016	U	<0.00017	U	0.016	J	<0.00016	U	<0.00017	U	0.21	J	<0.00017	U	<0.0096	U	<0.00017	U	<0.0096	U	<0.00015	U	<0.0096	U	<0.00015	U		
cis-1,3-Dichloropropene					<0.0089	U	<0.00016	U	<0.00015	U	<0.00015	U	<0.00015	U	<0.00014	U	<0.00016	U	<0.0091	U	<0.00015	U	<0.0087	U	<0.00015	U	<0.0087	U	<0.00014	U	<0.0087	U	<0.00014	U		
Cyclohexane					<0.031	U	<0.00055	U	0.0012	J	<0.00052	U	<0.00052	U	0.0013	J	<0.00055	U	<0.031	U	<0.00055	U	<0.03	U	<0.00055	U	<0.03	U	<0.00047	U	<0.03	U	<0.00047	U		
Dibromochloromethane					<0.0079	U	<0.00013	U	<0.00013	U	<0.00013	U	<0.00013	U	<0.00012	U	<0.00014	U	<0.008	U	<0.00014	U	<0.0077	U	<0.00014	U	<0.0077	U	<0.00012	U	<0.0077	U	<0.00012	U		
Dichlorodifluoromethane					<0.052	U	<0.00093	U	<0.00086	U	<0.00086	U	<0.00088	U	<0.00082	U	<0.00092	U	<0.052	U	<0.00089	U	<0.05	U	<0.00089	U	<0.05	U	<0.00078	U	<0.05					



Table 2
Corrective Measures Investigation Sampling Results
275 Franklin Street and 432 Pearl Street BCP Sites

ANALYTE	SAMPLE ID: DPB04-14-07292024				DPB04-18-07292024				DPB04-26-07292024				DPB05-14-07262024				DPB05-18-07262024				DPB06-14-07252024				DPB06-18-07252024				DPB07-12-07182024				DPB07-17-07182024				DPB08-13-07162024				DPB08-18-07162024							
	LAB ID: L2442554-01				L2442554-02				L2442554-03				L2442354-01				L2442354-02				L2441929-02				L2441929-03				L2440559-01				L2440559-02				L2439936-01				L2439936-02							
	COLLECTION DATE: 7/29/2024				7/29/2024				7/29/2024				7/26/2024				7/26/2024				7/25/2024				7/25/2024				7/18/2024				7/18/2024				7/16/2024				7/16/2024							
	BORING ID:				DPB-04				DPB-04				DPB-05				DPB-05				DPB-06				DPB-06				DPB-07				DPB-07				DPB-08				DPB-08							
	SAMPLE DEPTH (BGS):				12-14'				16-18'				24-26'				12-14'				16-18'				12-14'				16-18'				12-14'				16-18'				12-14'				16-18'			
	SAMPLE MATRIX:				SOIL				SOIL				SOIL				SOIL				SOIL				SOIL				SOIL				SOIL				SOIL				SOIL				SOIL			
	Commercial	Restricted Residential	Residential	Protection of Ground Water Standard																																												
(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)																																													
VOLATILE ORGANICS (EPA 8260) (mg/kg)																																																
1,1,1-Trichloroethane	500	100	100	0.68	<0.0098	U	<0.00017	U	<0.00017	U	<0.01	U	<0.00016	U	<0.00018	U	<0.00018	U	<0.00015	U	<0.00019	U	<0.00018	U	<0.00015	U	<0.00019	U	<0.00018	U	<0.00015	U	<0.00018	U	<0.00015	U	<0.00018	U	<0.00015	U								
1,1,2,2-Tetrachloroethane					<0.0098	U	<0.00017	U	<0.00017	U	<0.01	U	<0.00016	U	<0.00018	U	<0.00018	U	<0.00015	U	<0.00019	U	<0.00018	U	<0.00015	U	<0.00019	U	<0.00018	U	<0.00015	U	<0.00018	U	<0.00015	U	<0.00018	U	<0.00015	U								
1,1,2-Trichloroethane					<0.016	U	<0.00027	U	<0.00027	U	<0.016	U	<0.00026	U	<0.00029	U	<0.00029	U	<0.00025	U	<0.0003	U	<0.00029	U	<0.00025	U	<0.0003	U	<0.00029	U	<0.00025	U	<0.00029	U	<0.00025	U	<0.00029	U	<0.00025	U								
1,1-Dichloroethane	240	26	19	0.27	<0.0085	U	<0.00015	U	<0.00015	U	<0.0088	U	<0.00014	U	<0.00016	U	<0.00016	U	<0.00013	U	<0.00016	U	<0.00016	U	<0.00013	U	<0.00016	U	<0.00016	U	<0.00013	U	<0.00016	U	<0.00013	U	<0.00016	U	<0.00013	U								
1,1-Dichloroethene	500	100	100	0.33	<0.014	U	<0.00024	U	<0.00024	U	<0.014	U	<0.00023	U	<0.00026	U	<0.00026	U	<0.00022	U	<0.00022	U	<0.00022	U	<0.00027	U	<0.00026	U	<0.00027	U	<0.00026	U	<0.00027	U	<0.00026	U	<0.00027	U	<0.00022	U								
1,2,3-Trichlorobenzene					<0.019	U	<0.00033	U	<0.00033	U	<0.02	U	<0.00031	U	<0.00035	U	<0.00035	U	<0.0003	U	<0.00036	U	<0.0003	U	<0.00036	U	-		<0.00036	U	-		-		-		-		-									
1,2,4-Trichlorobenzene					<0.016	U	<0.00028	U	<0.00028	U	<0.016	U	<0.00026	U	<0.00029	U	<0.0003	U	<0.00025	U	<0.0003	U	<0.00025	U	<0.0003	U	<0.00025	U	<0.0003	U	<0.00025	U	<0.0003	U	<0.00025	U	<0.0003	U	<0.00025	U								
1,2-Dibromo-3-chloropropane					<0.059	U	<0.001	U	<0.001	U	<0.061	U	<0.00097	U	<0.0011	U	<0.0011	U	<0.00092	U	<0.0011	U	<0.00092	U	<0.0011	U	<0.00092	U	<0.0011	U	<0.00092	U	<0.0011	U	<0.00092	U	<0.0011	U	<0.00092	U								
1,2-Dibromoethane					<0.016	U	<0.00028	U	<0.00028	U	<0.017	U	<0.00027	U	<0.0003	U	<0.00031	U	<0.00026	U	<0.00031	U	<0.00026	U	<0.00031	U	<0.00026	U	<0.00031	U	<0.00026	U	<0.00031	U	<0.00026	U	<0.00031	U	<0.00026	U								
1,2-Dichlorobenzene	500	100	100	1.1	<0.0085	U	<0.00015	U	<0.00015	U	<0.0088	U	<0.00014	U	<0.00016	U	<0.00016	U	<0.00013	U	<0.00016	U	<0.00016	U	<0.00013	U	<0.00016	U	<0.00016	U	<0.00013	U	<0.00016	U	<0.00013	U	<0.00016	U	<0.00013	U								
1,2-Dichloroethane	30	3.1	2.3	0.02	<0.015	U	<0.00026	U	<0.00026	U	<0.016	U	<0.00025	U	<0.00028	U	<0.00028	U	<0.00028	U	<0.00028	U	<0.00028	U	<0.00028	U	<0.00028	U	<0.00028	U	<0.00028	U	<0.00028	U	<0.00028	U	<0.00028	U	<0.00028	U								
1,2-Dichloropropane					<0.0074	U	<0.00013	U	<0.00013	U	<0.0076	U	<0.00012	U	<0.00014	U	<0.00014	U	<0.00012	U	<0.00014	U	<0.00012	U	<0.00014	U	<0.00012	U	<0.00014	U	<0.00012	U	<0.00014	U	<0.00012	U	<0.00014	U	<0.00012	U								
1,3-Dichlorobenzene	280	49	17	2.4	<0.0087	U	<0.00015	U	<0.00015	U	<0.009	U	<0.00014	U	<0.00016	U	<0.00016	U	<0.00014	U	<0.00016	U	<0.00014	U	<0.00016	U	<0.00014	U	<0.00016	U	<0.00014	U	<0.00016	U	<0.00014	U	<0.00016	U	<0.00014	U								
1,4-Dichlorobenzene	130	13	9.8	1.8	<0.01	U	<0.00017	U	<0.00017	U	<0.01	U	<0.00016	U	<0.00018	U	<0.00019	U	<0.00016	U	<0.00019	U	<0.00016	U	<0.00019	U	<0.00016	U	<0.00019	U	<0.00016	U	<0.00019	U	<0.00016	U	<0.00019	U	<0.00016	U								
1,4-Dioxane	130	13	9.8	0.1	<2.1	U	<0.036	U	<0.036	U	<2.1	U	<0.034	U	<0.038	U	<0.039	U	<0.032	U	<0.039	U	<0.032	U	<0.039	U	<0.032	U	<0.039	U	<0.032	U	<0.039	U	<0.032	U	<0.039	U	<0.032	U								
2-Butanone	500	100	100	0.12	<0.13	U	<0.0022	U	<0.0023	U	<0.14	U	<0.0021	U	<0.0024	U	<0.0024	U	<0.002	U	<0.0024	U	<0.002	U	<0.0025	U	<0.0024	U	<0.0025	U	<0.0024	U	<0.0025	U	<0.0024	U	<0.0025	U	<0.0024	U								
2-Hexanone					<0.069	U	<0.0012	U	<0.0012	U	<0.072	U	<0.0011	U	<0.0013	U	<0.0013	U	<0.0011	U	<0.0013	U	<0.0011	U	<0.0013	U	<0.0011	U	<0.0013	U	<0.0011	U	<0.0013	U	<0.0011	U	<0.0013	U	<0.0011	U								
4-Methyl-2-pentanone					<0.075	U	<0.0013	U	<0.0013	U	<0.078	U	<0.0012	U	<0.0014	U	<0.0014	U	<0.0012	U	<0.0014	U	<0.0012	U	<0.0014	U	<0.0012	U	<0.0014	U	<0.0012	U	<0.0014	U	<0.0012	U	<0.0014	U	<0.0012	U								
Acetone	500	100	100	0.05	<0.28	U	0.0057	J	<0.0049	U	<0.29	U	<0.0046	U	<0.0052	U	<0.0053	U	<0.0044	U	<0.0053	U	<0.0044	U	<0.0053	U	<0.0044	U	<0.0053	U	<0.0044	U	<0.0053	U	<0.0044	U	<0.0053	U	<0.0044	U								
Benzene	44	4.8	2.9	0.06	0.0013		<0.00017	U	0.00052		<0.01	U	<0.00016	U	<0.00018	U	<0.00018	U	<0.00015	U	<0.00019	U	<0.00018	U	<0.00015	U	<0.00019	U	<0.00018	U	0.00018	J	<0.00018	J	<0.00015	U	<0.00018	J	<0.00015	U								
Bromochloromethane					<0.012	U	<0.00021	U	<0.00021	U	<0.012	U	<0.0002	U	<0.00022	U	<0.00022	U	<0.00019	U	<0.00022	U	<0.00019	U	<0.00023	U	-		<0.00023	U	-		-		-		-		-									
Bromodichloromethane					<0.0064	U	<0.00011	U	<0.00011	U	<0.0066	U	<0.0001	U	<0.00012	U	<0.00012	U	<0.0001	U	<0.00012	U	<0.0001	U	<0.00012	U	<0.0001	U	<0.00012	U	<0.0001	U	<0.00012	U	<0.0001	U	<0.00012	U	<0.0001	U								
Bromoform					<0.014	U	<0.00025	U	<0.00025	U	<0.015	U	<0.00024	U	<0.00027	U	<0.00027	U	<0.00023	U	<0.00027	U	<0.00023	U	<0.00027	U	<0.00023	U	<0.00027	U	<0.00023	U	<0.00027	U	<0.00023	U	<0.00027	U	<0.00023	U								
Bromomethane					<0.034	U	<0.00059	U	<0.00059	U	<0.035	U	<0.00056	U	<0.00063	U	<0.00064	U	<0.00054	U	<0.00065	U	<0.00054	U	<0.00065	U	<0.00054	U	<0.00065	U	<0.00054	U	<0.00065	U	<0.00054	U	<0.00065	U	<0.00054	U								
Carbon disulfide					<0.27	U	<0.0046	U	<0.0046	U	<0.28	U	<0.0044	U	<0.0049	U	<0.005	U	<0.0042	U	<0.0051	U	<0.0042	U	<0.0051	U	<0.0042	U	<0.0051	U	<0.0042	U	<0.0051	U	<0.0042	U	<0.0051	U	<0.0042	U								
Carbon tetrachloride	22	2.4	1.4	0.76	<0.014	U	<0.00023	U	<0.00023	U	<0.014	U	<0.00022	U	<0.00025	U	<0.00025	U	<0.00021	U	<0.00025	U	<0.00021	U	<0.00025	U	<0.00021	U	<0.00025	U	<0.00021	U	<0.00025	U	<0.00021	U	<0.00025	U	<0.00021	U								
Chlorobenzene	500	100	100	1.1	<0.0075	U	<0.00013	U	<0.00013	U	<0.0077	U	<0.00012	U	<0.00014	U	<0.00014	U	<0.00012	U	<0.00014	U	<0.00012	U	<0.00014	U	<0.00012	U	<0.00014	U	<0.00012	U	<0.00014	U	<0.00012	U	<0.00014	U	<0.00012	U								
Chloroethane					<0.026	U	<0.00046	U	<0.00046	U	<0.028	U	<0.00044	U	<0.00049	U	<0.0005	U	<0.00042	U	<0.00051	U	<0.00042	U	<0.00051	U	<0.00042	U	<0.00051	U	<0.00042	U	<0.00051	U	<0.00042	U	<0.00051	U	<0.00042	U								
Chloroform	350	49	10	0.37	<0.0082	U	0.00014	J	0.00022	J	<0.0085	U	<0.00014	U	<0.00015	U	<0.00015																															



Table 2
Corrective Measures Investigation Sampling Results
275 Franklin Street and 432 Pearl Street BCP Sites

ANALYTE	SAMPLE ID:				DPB09-14-07232024	DPB09-18-07232024	DPB10-12-07192024	DPB10-17-07192024	DPB11-14-07222024	DPB11-18-07222024	DPB12-14-10032024	DPB12-18-10032024								
	LAB ID:				L2441324-01	L2441324-02	L2440916-01	L2440916-02	L2441132-01	L2441132-02	L2457535-01	L2457535-02								
	COLLECTION DATE:				7/23/2024	7/23/2024	7/19/2024	7/19/2024	7/22/2024	7/22/2024	10/3/2024	10/3/2024								
	BORING ID:				DPB-09		DPB-10		DPB-11		DPB-12									
	SAMPLE DEPTH (BGS):				12-14'	16-18'	10-12'	16-18'	12-14'	16-18'	12-14'	16-18'								
	SAMPLE MATRIX:				SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL								
	Commercial	Restricted Residential	Residential	Protection of Ground Water Standard																
(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)																	
VOLATILE ORGANICS (EPA 8260) (mg/kg)																				
1,1,1-Trichloroethane	500	100	100	0.68	<0.0095	U	<0.00017	U	<0.00015	U	<0.0099	U	<0.00015	U	<0.0098	U	<0.00016	U	<0.011	U
1,1,2,2-Tetrachloroethane					<0.0094	U	<0.00017	U	<0.00015	U	<0.0098	U	<0.00015	U	<0.0098	U	<0.00016	U	<0.011	U
1,1,2-Trichloroethane					<0.015	U	<0.00027	U	<0.00024	U	<0.016	U	<0.00024	U	<0.016	U	<0.00025	U	<0.018	U
1,1-Dichloroethane	240	26	19	0.27	<0.0082	U	<0.00015	U	<0.00013	U	<0.0086	U	<0.00013	U	<0.0085	U	<0.00014	U	<0.0096	U
1,1-Dichloroethene	500	100	100	0.33	<0.014	U	<0.00024	U	<0.00022	U	<0.014	U	<0.00022	U	<0.014	U	<0.00022	U	<0.016	U
1,2,3-Trichlorobenzene					<0.018	U	<0.00033	U	<0.00029	U	<0.019	U	<0.0003	U	<0.019	U	-	-	-	-
1,2,4-Trichlorobenzene					<0.015	U	<0.00028	U	<0.00025	U	<0.016	U	<0.00025	U	<0.016	U	<0.00026	U	<0.022	U
1,2-Dibromo-3-chloropropane					<0.057	U	<0.001	U	<0.00091	U	<0.059	U	<0.00092	U	<0.059	U	<0.00094	U	<0.066	U
1,2-Dibromoethane					<0.016	U	<0.00028	U	<0.00025	U	<0.016	U	<0.00026	U	<0.016	U	<0.00026	U	<0.018	U
1,2-Dichlorobenzene	500	100	100	1.1	<0.0082	U	<0.00015	U	<0.00013	U	<0.0085	U	<0.00013	U	<0.0085	U	<0.00014	U	<0.0095	U
1,2-Dichloroethane	30	3.1	2.3	0.02	<0.014	U	<0.00026	U	<0.00023	U	<0.015	U	<0.00024	U	<0.015	U	<0.00024	U	<0.017	U
1,2-Dichloropropane					<0.0071	U	<0.00013	U	<0.00011	U	<0.0074	U	<0.00011	U	<0.0073	U	<0.00012	U	<0.0082	U
1,3-Dichlorobenzene	280	49	17	2.4	<0.0084	U	<0.00015	U	<0.00013	U	<0.0088	U	<0.00014	U	<0.0087	U	<0.00014	U	<0.0098	U
1,4-Dichlorobenzene	130	13	9.8	1.8	<0.0097	U	<0.00018	U	<0.00016	U	<0.01	U	<0.00016	U	<0.01	U	<0.00016	U	.011	U
1,4-Dioxane	130	13	9.8	0.1	<2	U	<0.036	U	<0.032	U	<2.1	U	<0.032	U	<2.1	U	-	-	-	-
2-Butanone	500	100	100	0.12	<0.12	U	<0.0023	U	<0.002	U	<0.13	U	<0.002	U	<0.13	U	<0.0021	U	<0.15	U
2-Hexanone					<0.067	U	<0.0012	U	<0.0011	U	<0.07	U	<0.0011	U	<0.069	U	<0.0011	U	<0.078	U
4-Methyl-2-pentanone					<0.073	U	<0.0013	U	<0.0012	U	<0.076	U	<0.0012	U	<0.075	U	<0.0012	U	<0.084	U
Acetone	500	100	100	0.05	<0.27	U	<0.0049	U	<0.0044	U	<0.28	U	<0.0044	U	<0.28	U	<0.0045	U	<0.32	U
Benzene	44	4.8	2.9	0.06	<0.0094	U	<0.00017	U	0.00016	J	<0.0098	U	0.00019	J	<0.0098	U	<0.00016	U	<0.011	U
Bromochloromethane					<0.012	U	<0.00021	U	<0.00019	U	<0.012	U	<0.00019	U	<0.012	U	-	-	-	-
Bromodichloromethane					<0.0062	U	<0.00011	U	<0.0001	U	<0.0064	U	<0.0001	U	<0.0064	U	<0.0001	U	<0.0072	U
Bromoform					<0.014	U	<0.00025	U	<0.00022	U	<0.014	U	<0.00022	U	<0.014	U	<0.00023	U	<0.016	U
Bromomethane					<0.033	U	<0.0006	U	<0.00053	U	<0.034	U	<0.00053	U	<0.034	U	<0.00055	U	<0.038	U
Carbon disulfide					<0.26	U	<0.0047	U	<0.0041	U	<0.27	U	<0.0042	U	<0.27	U	<0.0043	U	<0.3	U
Carbon tetrachloride	22	2.4	1.4	0.76	<0.013	U	<0.00024	U	<0.00021	U	<0.014	U	<0.00021	U	<0.014	U	<0.00022	U	<0.015	U
Chlorobenzene	500	100	100	1.1	<0.0072	U	<0.00013	U	<0.00012	U	<0.0075	U	<0.00012	U	<0.0075	U	<0.00012	U	<0.0084	U
Chloroethane					<0.026	U	<0.00046	U	<0.00041	U	<0.027	U	<0.00041	U	<0.026	U	<0.00042	U	<0.03	U
Chloroform	350	49	10	0.37	<0.0079	U	<0.00014	U	<0.00013	U	<0.0083	U	<0.00013	U	<0.0082	U	<0.00013	U	<0.0092	U
Chloromethane					<0.053	U	<0.00095	U	<0.00085	U	<0.055	U	<0.00085	U	<0.055	U	<0.00088	U	<0.062	U
cis-1,2-Dichloroethene	500	100	59	0.25	0.083		0.00074	J	0.00028	J	0.026	J	<0.00016	U	0.005		<0.00016	U	<0.009	U
cis-1,3-Dichloropropene					<0.009	U	<0.00016	U	<0.00014	U	<0.0094	U	<0.00014	U	<0.0093	U	<0.00015	U	<0.018	U
Cyclohexane					0.042	J	<0.00056	U	<0.00049	U	<0.032	U	<0.0005	U	<0.032	U	<0.00051	U	<0.036	U
Dibromochloromethane					<0.0079	U	<0.00014	U	<0.00013	U	<0.0083	U	<0.00013	U	<0.0082	U	<0.00013	U	<0.0092	U
Dichlorodifluoromethane					<0.052	U	<0.00094	U	<0.00083	U	<0.054	U	<0.00084	U	<0.054	U	<0.00086	U	<0.06	U
Ethylbenzene	390	41	30	1	<0.008	U	<0.00014	U	<0.00013	U	<0.0083	U	<0.00013	U	<0.0083	U	<0.00013	U	<0.0093	U
Freon-113					<0.039	U	<0.00071	U	<0.00063	U	<0.041	U	<0.00064	U	<0.041	U	<0.00065	U	<0.046	U
Isopropylbenzene					<0.0062	U	<0.00011	U	<0.0001	U	<0.0064	U	<0.0001	U	<0.0064	U	<0.0001	U	<0.0072	U
Methyl Acetate					<0.054	U	<0.00097	U	<0.00086	U	<0.056	U	<0.00087	U	2.2		<0.00089	U	<0.063	U
Methyl cyclohexane					0.14	J	<0.00062	U	<0.00055	U	<0.036	U	<0.00055	U	<0.035	U	<0.00057	U	<0.04	U
Methyl tert butyl ether	500	100	62	0.93	<0.011	U	<0.0002	U	<0.00018	U	<0.012	U	<0.00018	U	<0.012	U	<0.00019	U	<0.0013	U
Methylene chloride	500	100	51	0.05	<0.13	U	<0.0023	U	<0.0021	U	<0.14	U	<0.0021	U	<0.13	U	<0.0022	U	<0.15	U
o-Xylene (a)	500	100	100	1.6	<0.016	U	<0.0003	U	<0.00026	U	<0.017	U	<0.00027	U	<0.017	U	<0.00027	U	<0.019	U
p/m-Xylene (a)	500	100	100	1.6	<0.032	U	<0.00057	U	<0.00051	U	<0.033	U	<0.00051	U	<0.033	U	<0.00053	U	<0.037	U
Styrene					<0.011	U	<0.00018	U	<0.00018	U	<0.012	U	<0.00018	U	<0.012	U	<0.00018	U	<0.013	U
Tetrachloroethene	150	19	5.5	1.3	22		0.18		0.001		<0.00017	U	0.055		0.65		0.042		17	
Toluene	500	100	100	0.7	<0.031	U	<0.00056	U	<0.00049	U	<0.032	U	<0.0005	U	<0.032	U	<0.00051	U	<0.009	U
trans-1,2-Dichloroethene	500	100	100	0.19	<0.0078	U	<0.00014	U	<0.00012	U	<0.0081	U	<0.00012	U	<0.008	U	<0.00013	U	<0.009	U
trans-1,3-Dichloropropene					<0.015	U	<0.00028	U	<0.00025	U	<0.016	U	<0.00025	U	<0.016	U	<0.00026	U	<0.018	U
Trichloroethene	200	21	10	0.47	0.29		0.0033		0.00029	J	5.9		0.0003	J	0.0042		0.00026	J	<0.009	U
Trichlorofluoromethane					<0.039	U	<0.00071	U	<0.00063	U	<0.041	U	<0.00064	U	<0.041	U	<0.00065	U	<0.046	U
Vinyl chloride	13	0.9	0.21	0.02	<0.019	U	<0.00034	U	<0.0003	U	<0.02	U	<0.00031	U	<0.02	U	<0.00031	U	<0.022	U
Total VOCs					22.555		0.18404		0.10073		5.926		0.05549		2.8592		0.042026		17	
Total Xylenes (a)	500	100	100	0.26	<0.048		<0.0006		<0.00077		<0.050		<0.00078		<0.045		<0.0008		<0.056	
GENERAL CHEMISTRY																				
Solids, Total					84.8		84		82.7		87.4		85.2		82.4		83.9		80.3	



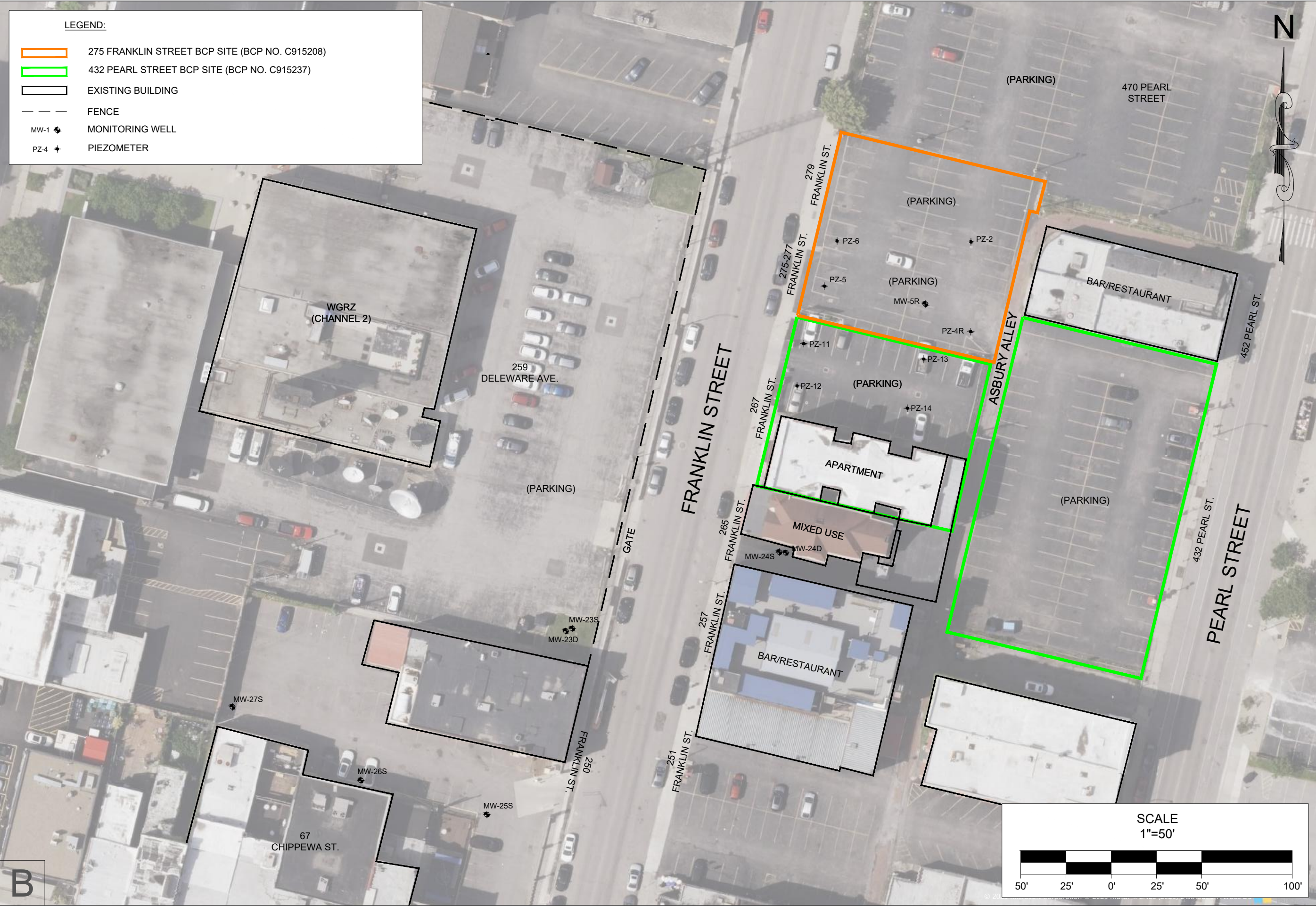
Table 2
Corrective Measures Investigation Sampling Results
275 Franklin Street and 432 Pearl Street BCP Sites

ANALYTE	SAMPLE ID:				DPB12-26-10032024	DPB99-14-10032024	DPB13-14-10032024	DPB13-18-10032024	DPB13-26-10032024	DPB14-14-10032024	DPB14-18-10032024	DPB14-26-10032024	DPB15-14-10102024	DPB15-18-10102024	DPB15-26-10102024
	LAB ID:				L2457535-03	L2457535-04	L2457535-05	L2457535-06	L2457535-07	L2457535-08	L2457535-09	L2457535-10	L2457594-01	L2457594-02	L2457594-03
	COLLECTION DATE:				10/3/2024	10/3/2024	10/3/2024	10/3/2024	10/3/2024	10/3/2024	10/3/2024	10/3/2024	10/10/2024	10/10/2024	10/10/2024
	BORING ID:				DPB-13				DPB-14				DPB-15		
	SAMPLE DEPTH (BGS):				25-26'	25-26'	12-14'	16-18'	25-26'	12-14'	16-18'	25-26'	12-14'	16-18'	25-26'
	SAMPLE MATRIX:				SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL	SOIL
	Commercial	Restricted Residential	Residential	Protection of Ground Water Standard											
	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)											
VOLATILE ORGANICS (EPA 8260) (mg/kg)															
1,1,1-Trichloroethane	500	100	100	0.68	<0.00017 U	<0.00015 U	<0.00016 U	<0.00016 U	<0.00018 U	<0.00017 U	<0.00017 U	<0.00018 U	<0.00016 U	<0.00017 U	<0.00018 U
1,1,2,2-Tetrachloroethane					<0.00017 U	<0.00015 U	<0.00016 U	<0.00016 U	<0.00018 U	<0.00017 U	<0.00017 U	<0.00018 U	<0.00016 U	<0.00016 U	<0.00018 U
1,1,2-Trichloroethane					<0.00027 U	<0.00024 U	<0.00026 U	<0.00025 U	<0.00028 U	<0.00027 U	<0.00027 U	<0.00029 U	<0.00026 U	<0.00026 U	<0.00029 U
1,1-Dichloroethane	240	26	19	0.27	<0.00015 U	<0.00013 U	<0.00014 U	<0.00014 U	<0.00015 U	<0.00014 U	<0.00014 U	<0.00016 U	<0.00014 U	<0.00014 U	<0.00016 U
1,1-Dichloroethene	500	100	100	0.33	<0.00024 U	<0.00021 U	<0.00023 U	<0.00022 U	<0.00025 U	0.0011 J	<0.00024 U	<0.00026 U	<0.00023 U	<0.00024 U	<0.00026 U
1,2,3-Trichlorobenzene					-	-	-	-	-	-	-	-	-	-	-
1,2,4-Trichlorobenzene					<0.00027 U	<0.00024 U	<0.00027 U	<0.00026 U	<0.00029 U	<0.00034 U	<0.00027 U	<0.00022 U	<0.00026 U	<0.00027 U	<0.0003 U
1,2-Dibromo-3-chloropropane					<0.001 U	<0.00088 U	<0.00094 U	<0.00094 U	<0.001 U	<0.001 U	<0.001 U	<0.0011 U	<0.00097 U	<0.00099 U	<0.0011 U
1,2-Dibromoethane					<0.00029 U	<0.00025 U	<0.00026 U	<0.00026 U	<0.0003 U	<0.00028 U	<0.00028 U	<0.0003 U	<0.00027 U	<0.00028 U	<0.00031 U
1,2-Dichlorobenzene	500	100	100	1.1	<0.00015 U	<0.00013 U	<0.00014 U	<0.00014 U	<0.00015 U	0.00054 J	<0.00014 U	<0.00016 U	<0.00014 U	<0.00014 U	<0.00016 U
1,2-Dichloroethane	30	3.1	2.3	0.02	<0.00026 U	<0.00023 U	<0.00024 U	<0.00024 U	<0.00027 U	<0.00026 U	<0.00026 U	<0.00028 U	<0.00025 U	<0.00026 U	<0.00028 U
1,2-Dichloropropane					<0.00013 U	<0.00011 U	<0.00012 U	<0.00012 U	<0.00013 U	<0.00012 U	<0.00012 U	<0.00014 U	<0.00012 U	<0.00012 U	<0.00014 U
1,3-Dichlorobenzene	280	49	17	2.4	<0.00015 U	<0.00013 U	<0.00014 U	<0.00014 U	<0.00016 U	<0.00015 U	<0.00015 U	<0.00016 U	<0.00014 U	<0.00015 U	<0.00016 U
1,4-Dichlorobenzene	130	13	9.8	1.8	<0.00018 U	<0.00015 U	<0.00016 U	<0.00016 U	<0.00018 U	<0.00017 U	<0.00017 U	<0.00018 U	<0.00016 U	<0.00017 U	<0.00019 U
1,4-Dioxane	130	13	9.8	0.1	-	-	-	-	-	-	-	-	-	-	-
2-Butanone	500	100	100	0.12	<0.0023 U	<0.002 U	<0.0022 U	<0.0021 U	<0.0024 U	<0.0022 U	<0.0022 U	<0.0024 U	<0.0022 U	<0.0022 U	<0.0024 U
2-Hexanone					<0.0012 U	<0.001 U	<0.0012 U	<0.0011 U	<0.0012 U	<0.0012 U	<0.0012 U	<0.0013 U	<0.0011 U	<0.0012 U	<0.0013 U
4-Methyl-2-pentanone					<0.0013 U	<0.0011 U	<0.0012 U	<0.0012 U	<0.0014 U	<0.0013 U	<0.0013 U	<0.0014 U	<0.0012 U	<0.0013 U	<0.0014 U
Acetone	500	100	100	0.05	<0.0049 U	<0.0042 U	<0.0047 U	<0.0045 U	<0.0051 U	<0.0048 U	<0.0048 U	<0.0052 U	<0.0047 U	<0.0048 U	<0.0053 U
Benzene	44	4.8	2.9	0.06	<0.00017 U	<0.00015 U	<0.00016 U	<0.00016 U	<0.00018 U	<0.00017 U	<0.00017 U	<0.00018 U	<0.00016 U	<0.00016 U	<0.00018 U
Bromochloromethane					-	-	-	-	-	-	-	-	-	-	-
Bromodichloromethane					<0.00011 U	<0.0001 U	<0.00011 U	<0.0001 U	<0.00012 U	<0.00011 U	<0.00011 U	<0.00012 U	<0.0001 U	<0.00011 U	<0.00012 U
Bromoform					<0.00025 U	<0.00022 U	<0.00024 U	<0.00023 U	<0.00026 U	<0.00025 U	<0.00025 U	<0.00027 U	<0.00024 U	<0.00024 U	<0.00027 U
Bromomethane					<0.0006 U	<0.00051 U	<0.00057 U	<0.00054 U	<0.00062 U	<0.00058 U	<0.00058 U	<0.00063 U	<0.00056 U	<0.00058 U	<0.00064 U
Carbon disulfide					<0.0047 U	<0.004 U	<0.0045 U	<0.0043 U	<0.0048 U	<0.0046 U	<0.0046 U	<0.0049 U	<0.0044 U	<0.0045 U	<0.005 U
Carbon tetrachloride	22	2.4	1.4	0.76	<0.00024 U	<0.0002 U	<0.00022 U	<0.00022 U	<0.00024 U	<0.00023 U	<0.00023 U	<0.00025 U	<0.00022 U	<0.00023 U	<0.00025 U
Chlorobenzene	500	100	100	1.1	<0.00013 U	<0.00011 U	<0.00012 U	<0.00012 U	<0.00013 U	<0.00013 U	<0.00013 U	<0.00014 U	<0.00012 U	<0.00013 U	<0.00014 U
Chloroethane					<0.00046 U	<0.0004 U	<0.00044 U	<0.00042 U	<0.00048 U	<0.00045 U	<0.00045 U	<0.00049 U	<0.00044 U	<0.00045 U	<0.0005 U
Chloroform	350	49	10	0.37	<0.00014 U	<0.00012 U	<0.00014 U	<0.00013 U	<0.00015 U	<0.00014 U	0.00022 J	0.00016 J	<0.00014 U	<0.00014 U	<0.00015 U
Chloromethane					<0.00096 U	<0.00082 U	<0.00091 U	<0.00088 U	<0.00099 U	<0.00094 U	<0.00093 U	<0.001 U	<0.0009 U	<0.00093 U	<0.001 U
cis-1,2-Dichloroethene	500	100	59	0.25	<0.00018 U	<0.00015 U	0.049	<0.00016 U	<0.00018 U	0.64	0.00055 J	0.00039 J	<0.00017 U	<0.00017 U	<0.00019 U
cis-1,3-Dichloropropene					<0.00016 U	<0.00014 U	<0.00016 U	<0.00015 U	<0.00017 U	<0.00016 U	<0.00016 U	<0.00017 U	<0.00015 U	<0.00016 U	<0.00017 U
Cyclohexane					<0.00056 U	<0.00048 U	<0.00051 U	<0.00051 U	<0.00058 U	<0.00055 U	<0.00054 U	<0.00059 U	<0.00053 U	<0.00054 U	<0.0006 U
Dibromochloromethane					<0.00094 U	<0.00012 U	<0.00014 U	<0.00013 U	<0.00015 U	<0.00014 U	<0.00014 U	<0.00015 U	<0.00014 U	<0.00014 U	<0.00015 U
Dichlorodifluoromethane					<0.00014 U	<0.00081 U	<0.0009 U	<0.00086 U	<0.00097 U	<0.00092 U	<0.00092 U	<0.00099 U	<0.00089 U	<0.00091 U	<0.001 U
Ethylbenzene	390	41	30	1	<0.00071 U	<0.00012 U	<0.00014 U	<0.00013 U	<0.00015 U	<0.00014 U	<0.00014 U	<0.00015 U	<0.00014 U	<0.00014 U	<0.00015 U
Freon-113					<0.00011 U	<0.00061 U	<0.00068 U	<0.00065 U	<0.00073 U	<0.0007 U	<0.00069 U	<0.00075 U	<0.00067 U	<0.00069 U	<0.00076 U
Isopropylbenzene					<0.00097 U	<0.001 U	<0.00011 U	<0.00011 U	<0.00012 U	<0.00011 U	<0.00011 U	<0.00012 U	<0.001 U	<0.00011 U	<0.00012 U
Methyl Acetate					<0.00062 U	<0.00084 U	<0.00093 U	<0.00089 U	<0.001 U	<0.00095 U	<0.00095 U	<0.001 U	<0.00092 U	<0.00094 U	<0.001 U
Methyl cyclohexane					<0.00021 U	<0.00053 U	<0.00059 U	<0.00057 U	<0.00064 U	<0.0006 U	<0.0006 U	<0.00065 U	<0.00058 U	<0.0006 U	<0.00066 U
Methyl tert butyl ether	500	100	62	0.93	<0.0023 U	<0.0018 U	<0.0002 U	<0.00019 U	<0.00021 U	<0.0002 U	<0.0002 U	<0.00022 U	<0.00019 U	<0.0002 U	<0.00022 U
Methylene chloride	500	100	51	0.05	<0.00067 U	<0.002 U	<0.0022 U	<0.0022 U	<0.0024 U	<0.00023 U	<0.00023 U	<0.0025 U	<0.0022 U	<0.0023 U	<0.0025 U
o-Xylene (a)	500	100	100	1.6	<0.0003 U	<0.00026 U	<0.00028 U	<0.00027 U	<0.00031 U	<0.00029 U	<0.00029 U	<0.00032 U	<0.00028 U	<0.00029 U	<0.00032 U
p/m-Xylene (a)	500	100	100	1.6	<0.00057 U	<0.00049 U	<0.00055 U	<0.00053 U	<0.00059 U	<0.00056 U	<0.00056 U	<0.00061 U	<0.00054 U	<0.00056 U	<0.00061 U
Styrene					<0.0002 U	<0.00017 U	<0.00019 U	<0.00018 U	<0.00021 U	<0.0002 U	<0.0002 U	<0.00021 U	<0.00019 U	<0.0002 U	<0.00021 U
Tetrachloroethene	150	19	5.5	1.3	0.0034 J	0.047 J	0.053	0.0015	<0.00021 U	0.24	0.044	0.00036 J	0.028	0.049	<0.00021 U
Toluene	500	100	100	0.7	<0.00056 U	<0.00048 U	<0.00053 U	<0.00051 U	<0.00058 U	<0.00054 U	<0.00054 U	<0.00059 U	<0.00053 U	<0.00054 U	<0.0006 U
trans-1,2-Dichloroethene	500	100	100	0.19	<0.00014 U	<0.00012 U	0.0038	<0.00013 U	<0.00014 U	0.0021	<0.00014 U	<0.00015 U	<0.00013 U	<0.00014 U	<0.00015 U
trans-1,3-Dichloropropene					<0.00028 U	<0.00024 U	<0.00027 U	<0.00026 U	<0.00029 U	<0.00027 U	<0.00027 U	<0.0003 U	<0.00026 U	<0.00027 U	<0.0003 U
Trichloroethene	200	21	10	0.47	<0.00014 U	0.00031 U	0.01	<0.00013 U	<0.00014 U	0.015	<0.00014 U	<0.00015 U	0.00016 J	0.00015 J	<0.00015 U
Trichlorofluoromethane					<0.00071 U	<0.00061 U	<0.00068 U	<0.00065 U	<0.00074 U	<0.0007 U	<0.0007 U	<0.00075 U	<0.00067 U	<0.00069 U	<0.00076 U
Vinyl chloride	13	0.9	0.21	0.02	<0.00034 U	<0.0003 U	<0.00033 U	<0.00031 U	<0.00036 U	<0.00034 U	<0.00034 U	<0.00036 U	<0.00032 U	<0.00033 U	<0.00037 U
Total VOCs					0.00034	0.04731	0.1158	0.0015	-	-	0.89874	-	0.04477	0.00091	0.02816
Total Xylenes (a)	500	100	100	0.26	<0.00087	<0.00075	<0.00083	<0.0008	<0.009	<0.00085	<0.00085	<0.00093	<0.00082	<0.00085	<0.00093
GENERAL CHEMISTRY															
Solids, Total					84.8	88.1	85.2	87.1	79.8	84.8	85.2	82.8	82.7	81.8	88

* Comparison is not performed on parameters with non-numeric criteria.

Figures





LEGEND:

- 275 FRANKLIN STREET BCP SITE (BCP NO. C915208)
- 432 PEARL STREET BCP SITE (BCP NO. C915237)
- EXISTING BUILDING
- FENCE
- MW-1 MONITORING WELL
- PZ-4 PIEZOMETER

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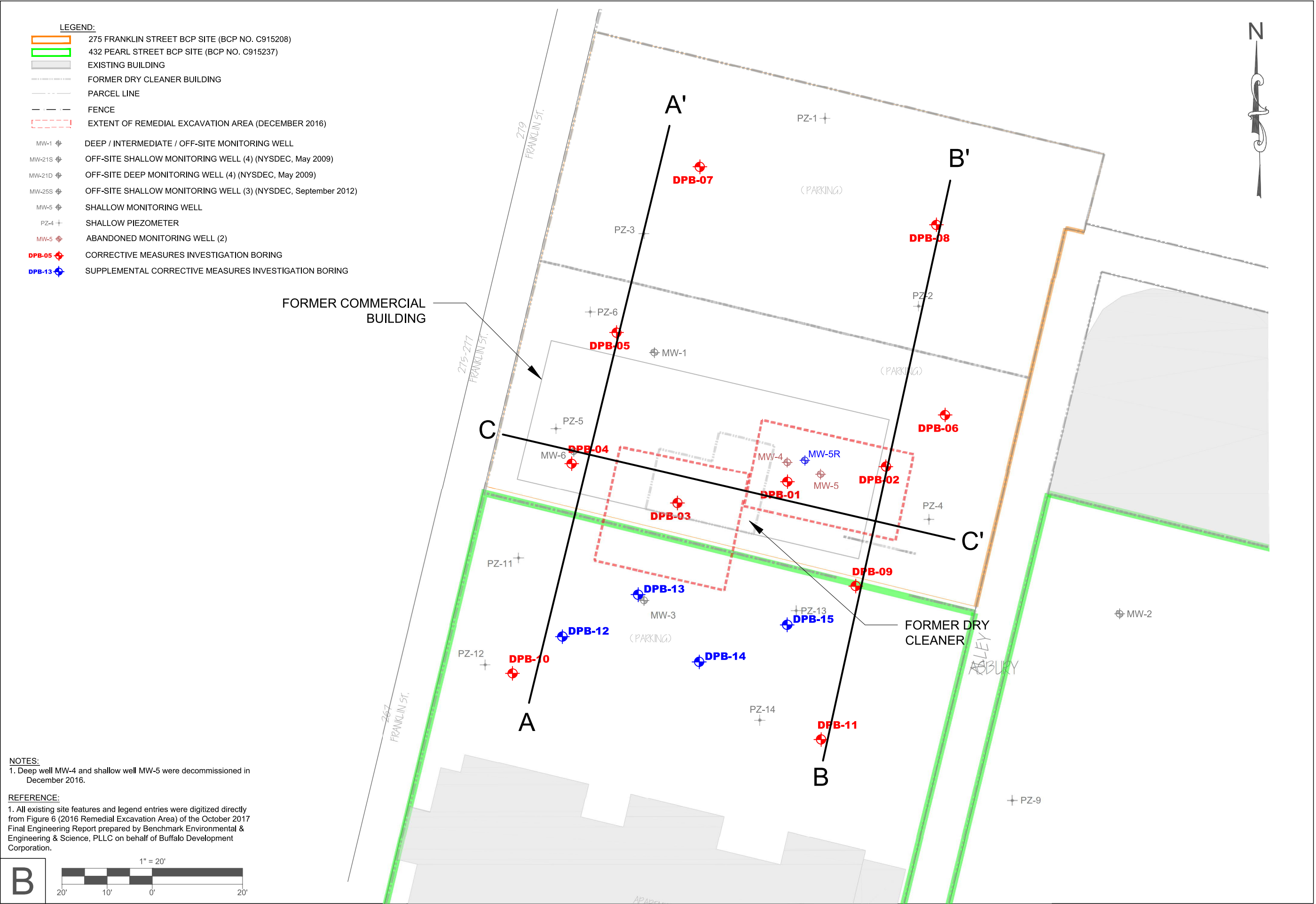
BCP Site Layout

BUFFALO DEVELOPMENT CORPORATION
275 FRANKLIN & 432 PEARL STREET
BUFFALO, NEW YORK 14202
BCP SITE NO. C915208 & C915237

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FIGURE 2-1

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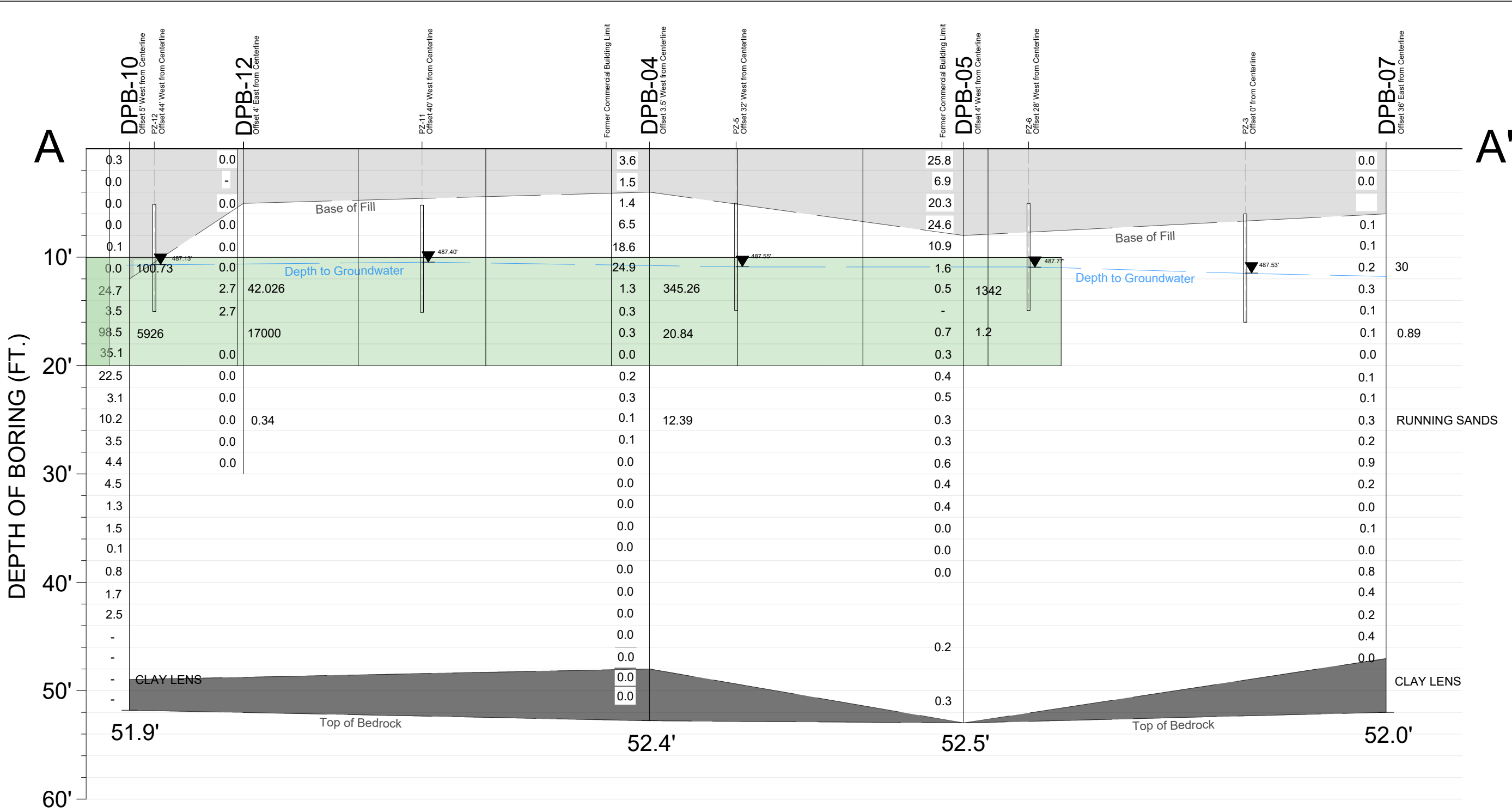
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Corrective Measures Investigation Work
Plan Cross Sections
275 Franklin Street and 432 Pearl Street
BCP Site
NYSDEC Site Nos. C915208 and C915237
Buffalo, NY

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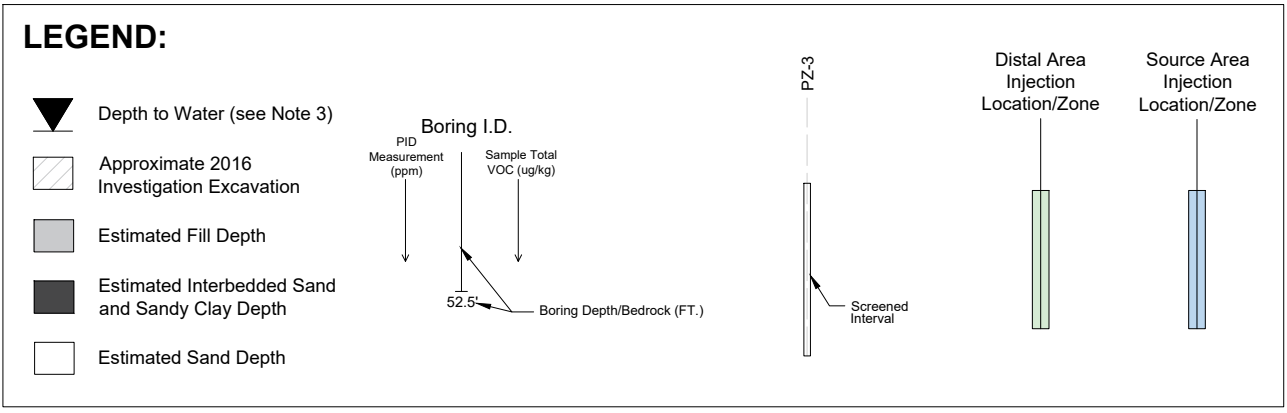
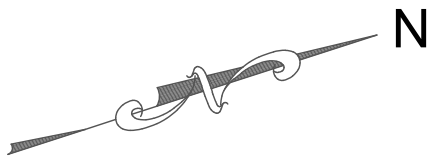
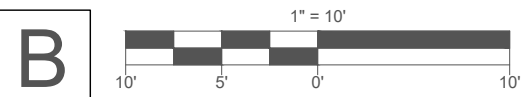
FIGURE 2-3

CROSS SECTIONS



NOTES:
1. Depth is not to scale.
2. Depth to water collected by Atlantic Testing Laboratories after drilling complete.
3. Depth to water at piezometers and wells gauged 4/16/2024. Depth shown (ex. 487.31') based on 1/11/07 survey with site specific datum of 500 feet.

REFERENCES:
1. Remedial Action Workplan - Revision 1, Benchmark Environmental Engineering Science, PLLC, November 22, 2016.



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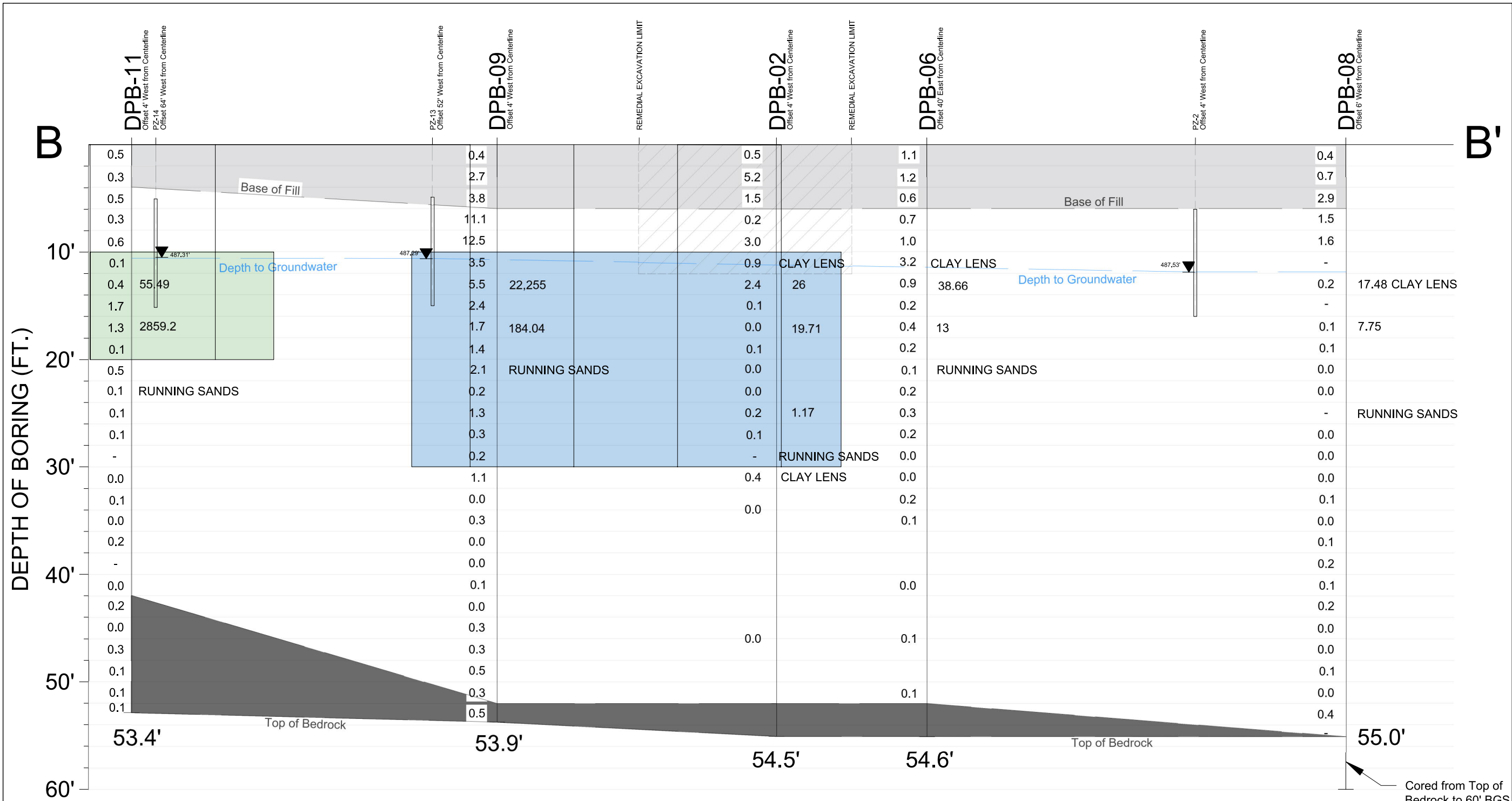
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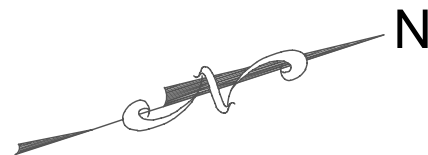
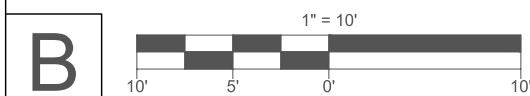
FIGURE 2-4

CROSS SECTION A-A'



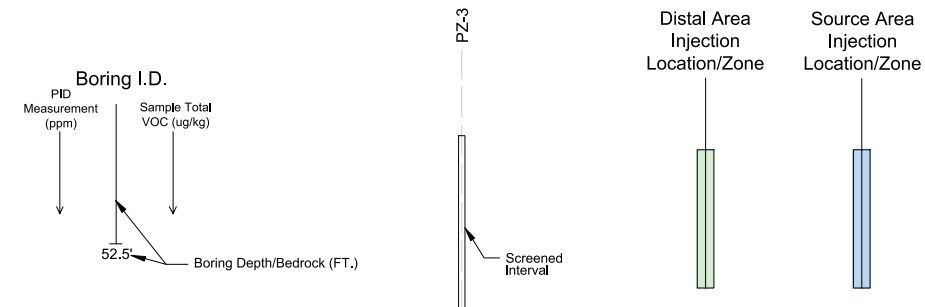
NOTES:
1. Depth is not to scale.
2. Depth to water collected by Atlantic Testing Laboratories after drilling complete.
3. Depth to water at piezometers and wells gauged 4/16/2024. Depth shown (ex. 487.31') based on 1/11/07 survey with site specific datum of 500 feet.

REFERENCES:
1. Remedial Action Workplan - Revision 1, Benchmark Environmental Engineering Science, PLLC, November 22, 2016.



LEGEND:

- ▼ Depth to Water (See Note 3)
- Approximate 2016 Investigation Excavation
- Estimated Fill Depth
- Estimated Interbedded Sand and Sandy Clay Depth
- Estimated Sand Depth



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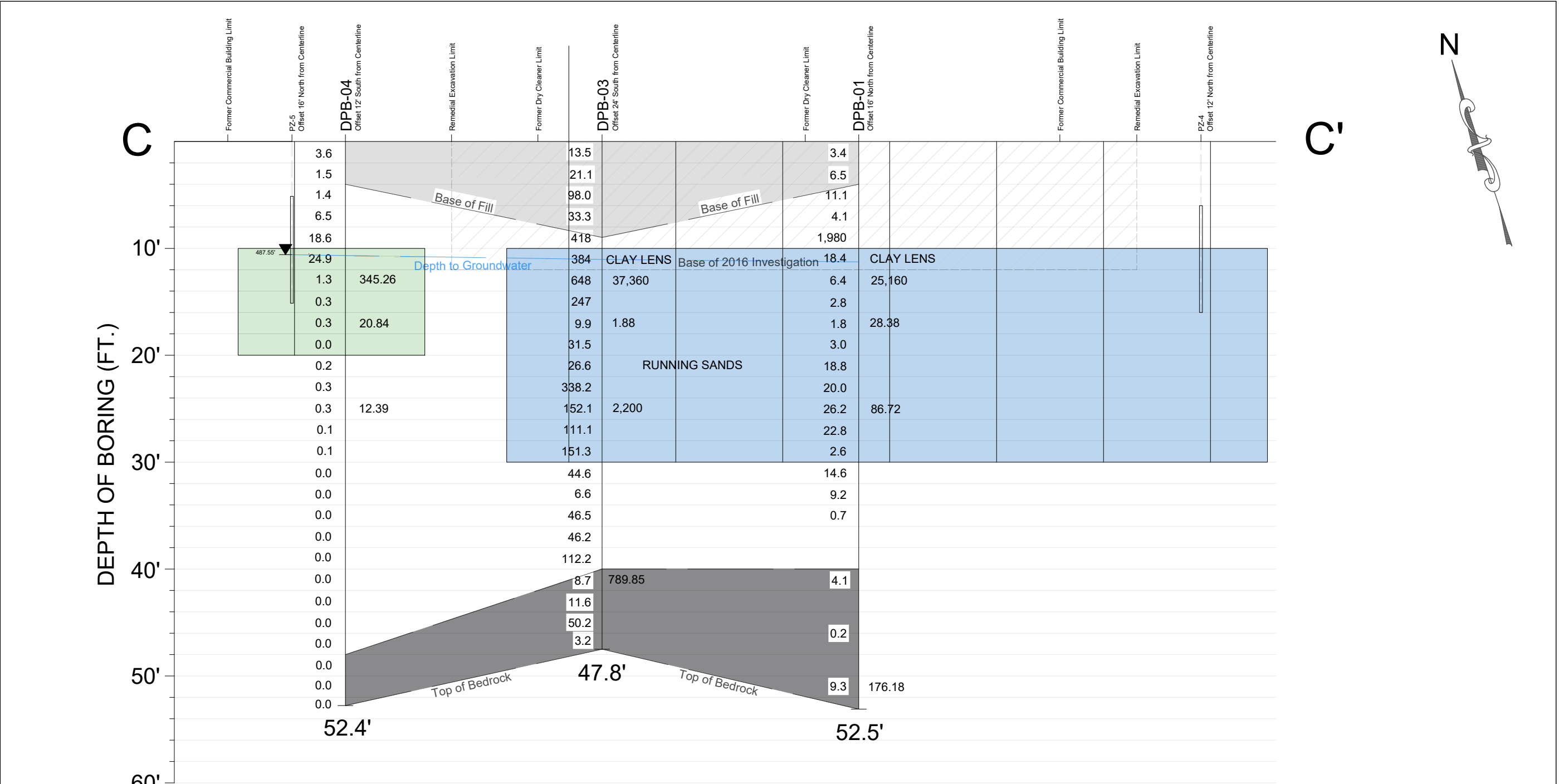
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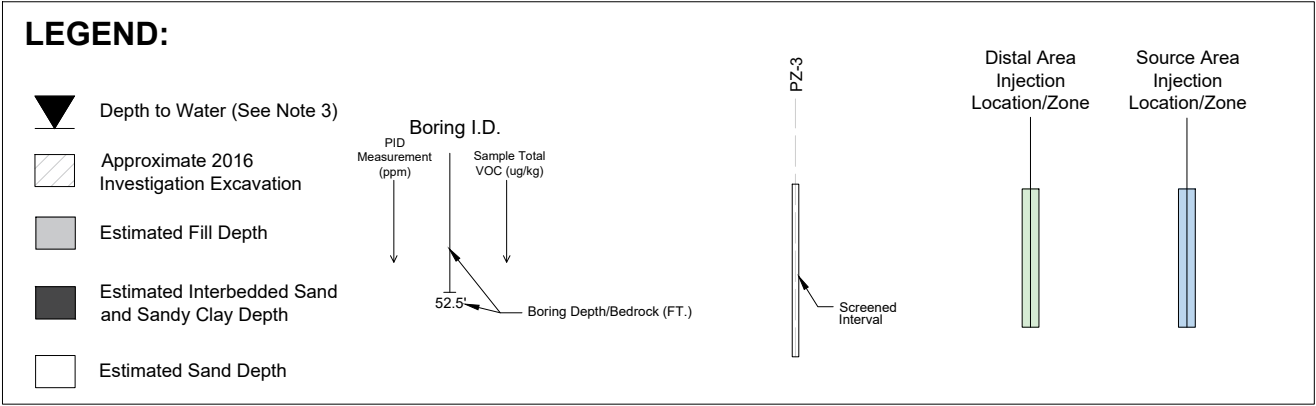
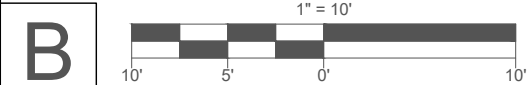
FIGURE 2-5

CROSS SECTION B-B'



NOTES:
1. Depth is not to scale.
2. Depth to water collected by Atlantic Testing Laboratories after drilling complete.
3. Depth to water at piezometers and wells gauged 4/16/2024. Depth shown (ex. 487.31') based on 1/11/07 survey with site specific datum of 500 feet.
4. PZ-4 not gauged during 4/16/2024 gauging event.

REFERENCES:
1. Remedial Action Workplan - Revision 1, Benchmark Environmental Engineering Science, PLLC, November 22, 2016.



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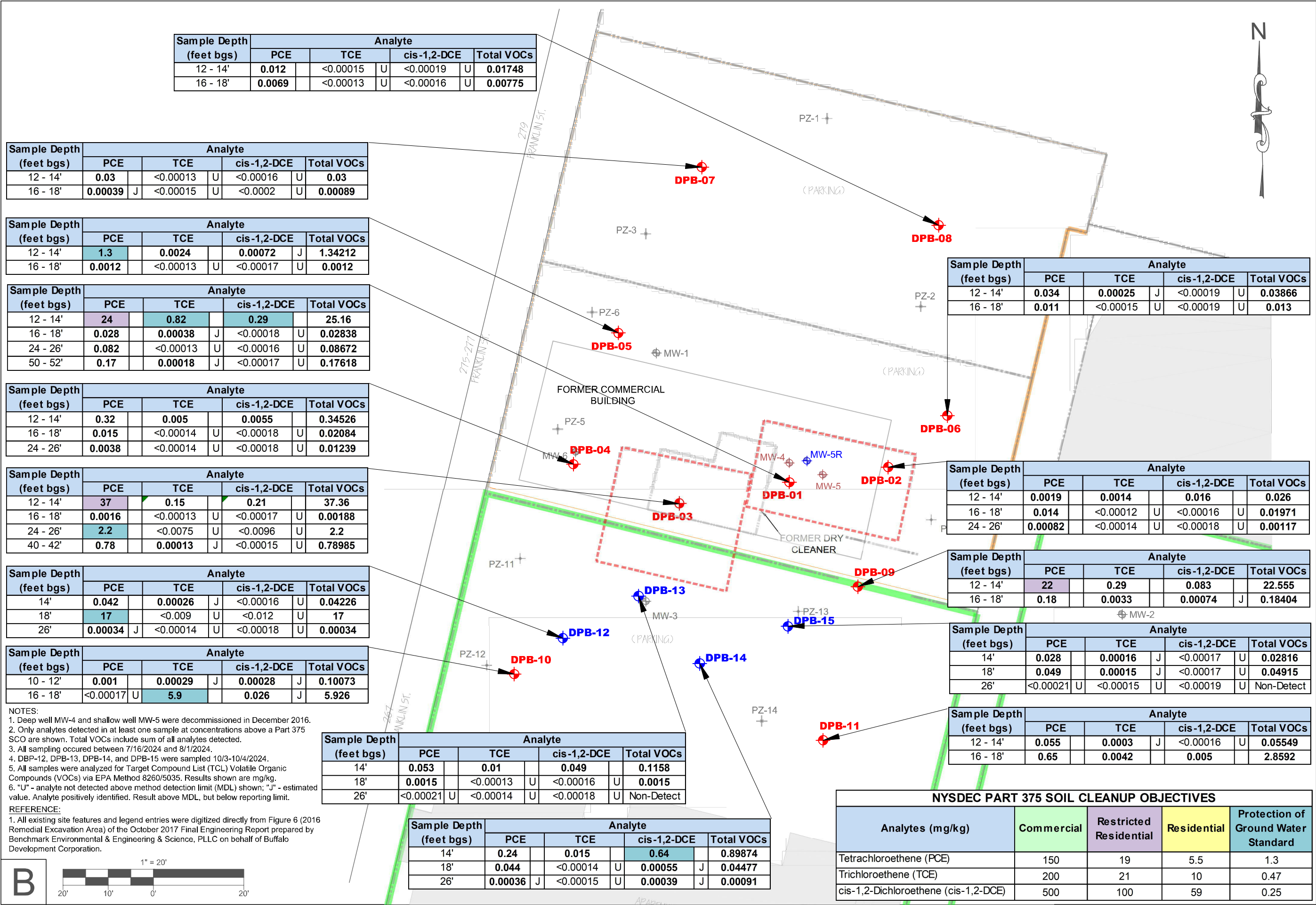
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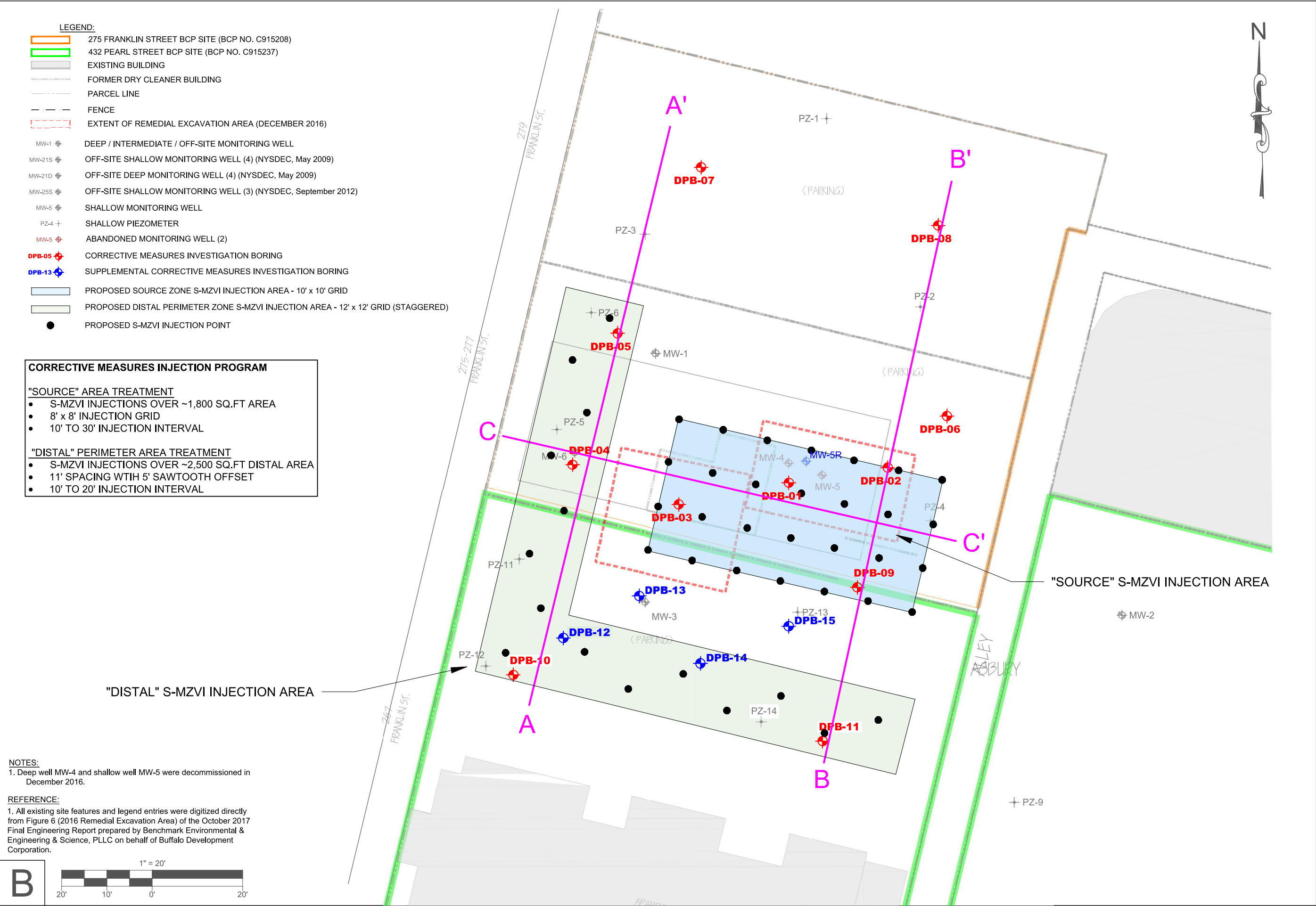
Corrective Measures Investigation Work
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FIGURE 2-6

CROSS SECTION C-C'





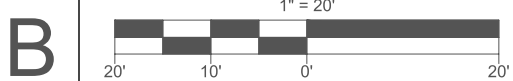
- LEGEND:**
- 275 FRANKLIN STREET BCP SITE (BCP NO. C915208)
 - 432 PEARL STREET BCP SITE (BCP NO. C915237)
 - EXISTING BUILDING
 - FORMER DRY CLEANER BUILDING
 - PARCEL LINE
 - FENCE
 - EXTENT OF REMEDIAL EXCAVATION AREA (DECEMBER 2016)
 - MW-1 DEEP / INTERMEDIATE / OFF-SITE MONITORING WELL
 - MW-21S OFF-SITE SHALLOW MONITORING WELL (4) (NYSDEC, May 2009)
 - MW-21D OFF-SITE DEEP MONITORING WELL (4) (NYSDEC, May 2009)
 - MW-25S OFF-SITE SHALLOW MONITORING WELL (3) (NYSDEC, September 2012)
 - MW-5 SHALLOW MONITORING WELL
 - PZ-4 SHALLOW PIEZOMETER
 - MW-5 ABANDONED MONITORING WELL (2)
 - DPB-05 CORRECTIVE MEASURES INVESTIGATION BORING
 - DPB-13 SUPPLEMENTAL CORRECTIVE MEASURES INVESTIGATION BORING
 - PROPOSED SOURCE ZONE S-MZVI INJECTION AREA - 10' x 10' GRID
 - PROPOSED DISTAL PERIMETER ZONE S-MZVI INJECTION AREA - 12' x 12' GRID (STAGGERED)
 - PROPOSED S-MZVI INJECTION POINT

CORRECTIVE MEASURES INJECTION PROGRAM

- "SOURCE" AREA TREATMENT**
- S-MZVI INJECTIONS OVER ~1,800 SQ.FT AREA
 - 8' x 8' INJECTION GRID
 - 10' TO 30' INJECTION INTERVAL
- "DISTAL" PERIMETER AREA TREATMENT**
- S-MZVI INJECTIONS OVER ~2,500 SQ.FT DISTAL AREA
 - 11' SPACING WITH 5' SAWTOOTH OFFSET
 - 10' TO 20' INJECTION INTERVAL

NOTES:
1. Deep well MW-4 and shallow well MW-5 were decommissioned in December 2016.

REFERENCE:
1. All existing site features and legend entries were digitized directly from Figure 6 (2016 Remedial Excavation Area) of the October 2017 Final Engineering Report prepared by Benchmark Environmental & Engineering & Science, PLLC on behalf of Buffalo Development Corporation.



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Corrective Measures Injection Program

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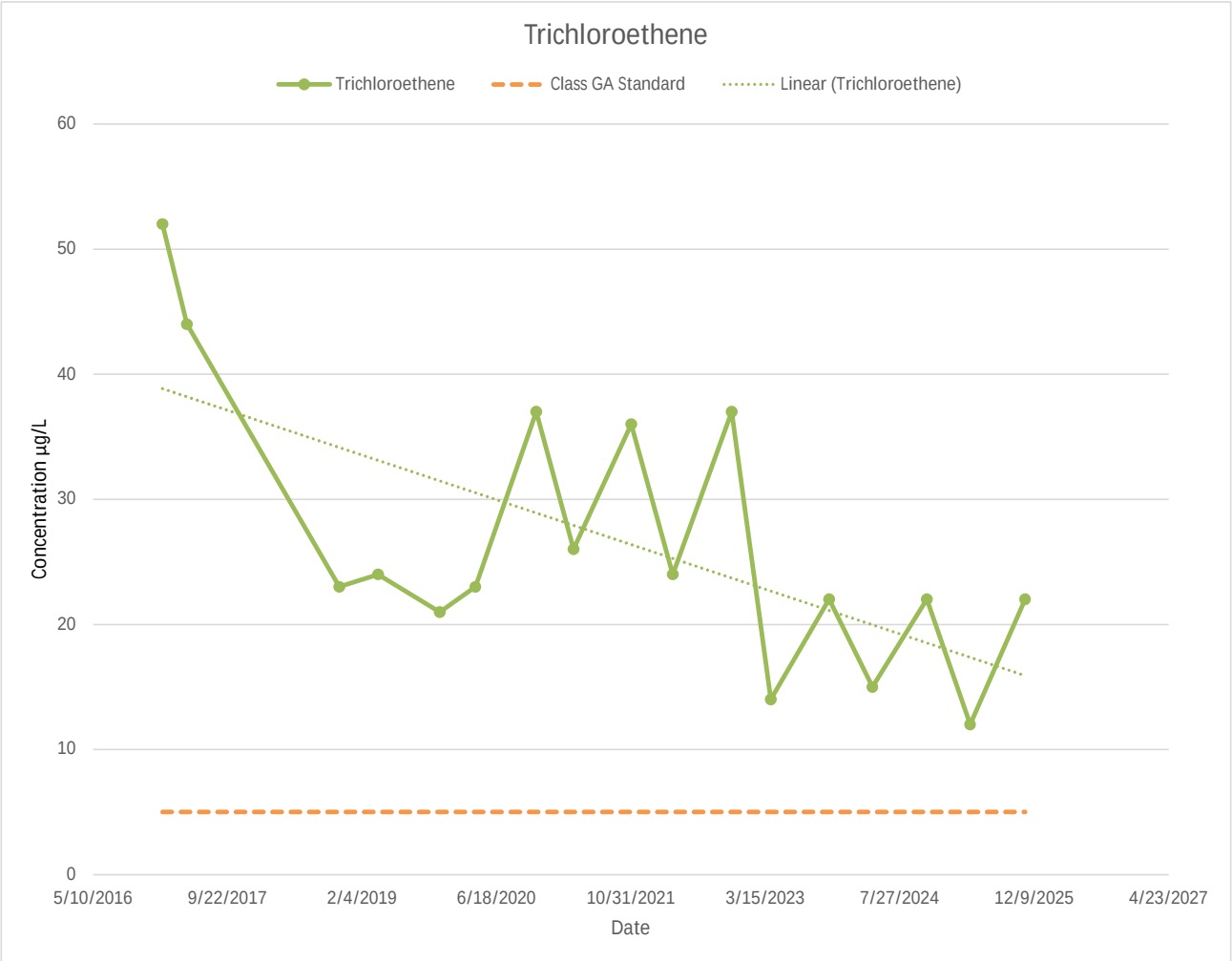
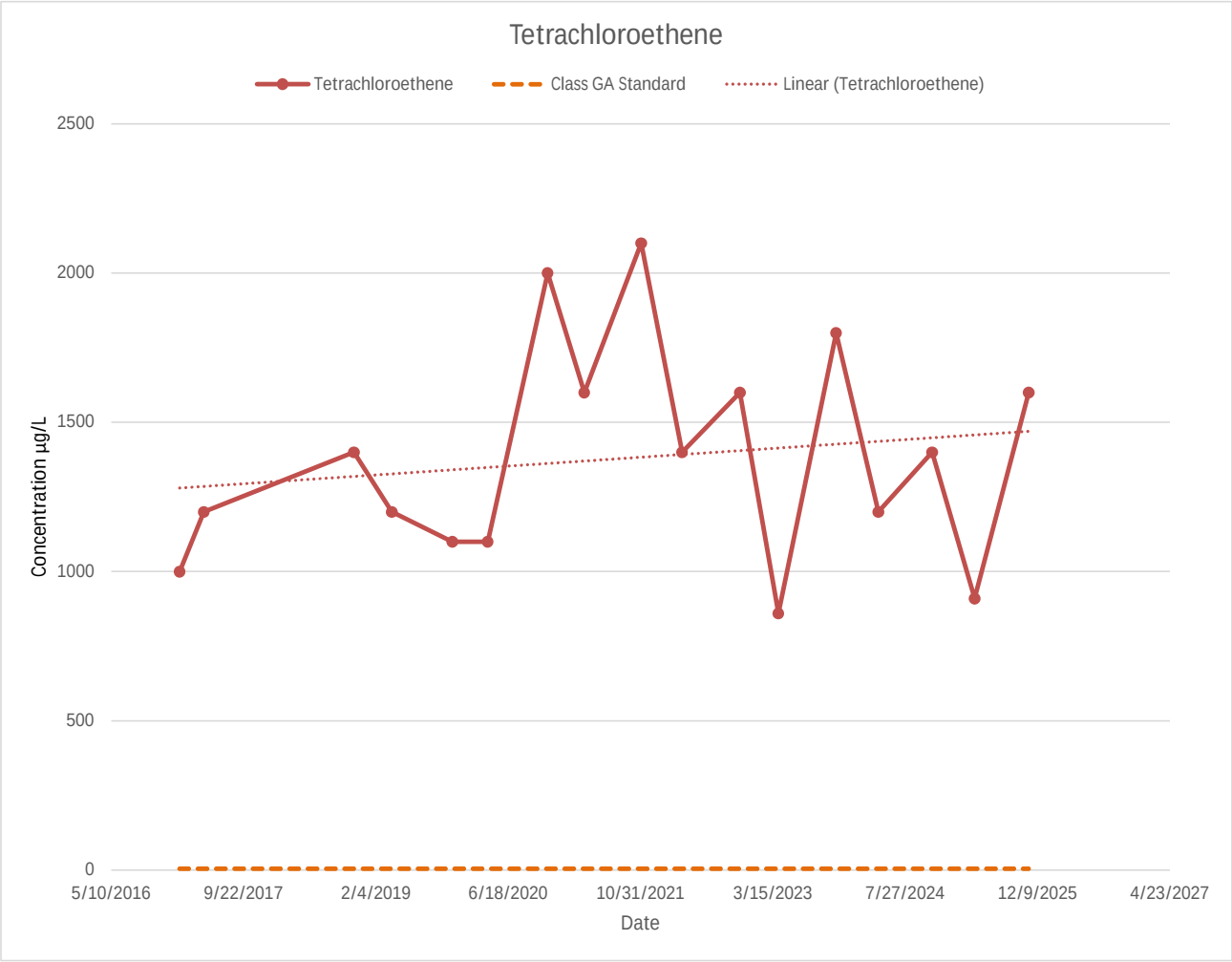
FIGURE 3-1

Appendix A – Post-2016 Excavation Groundwater Data Trends





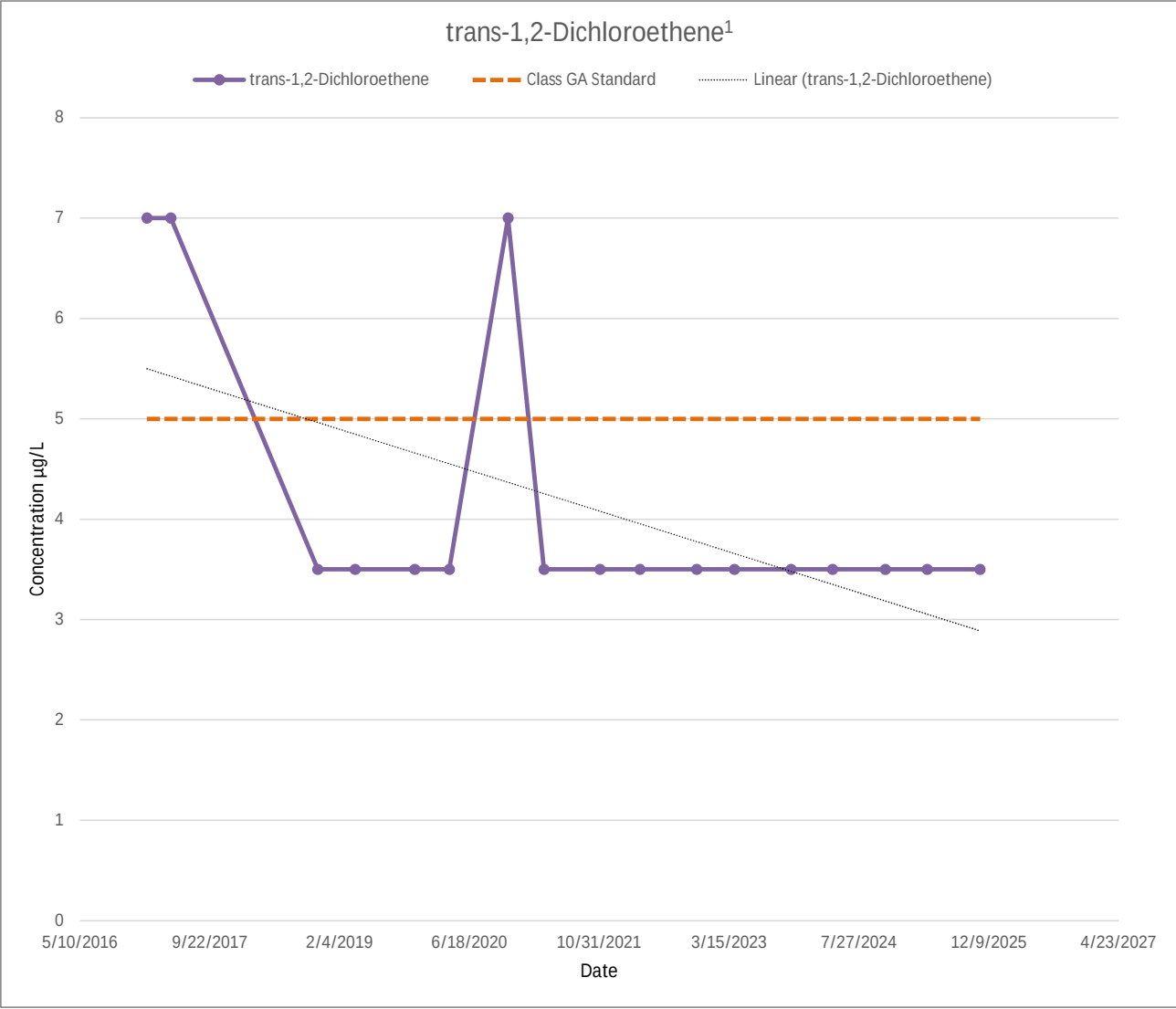
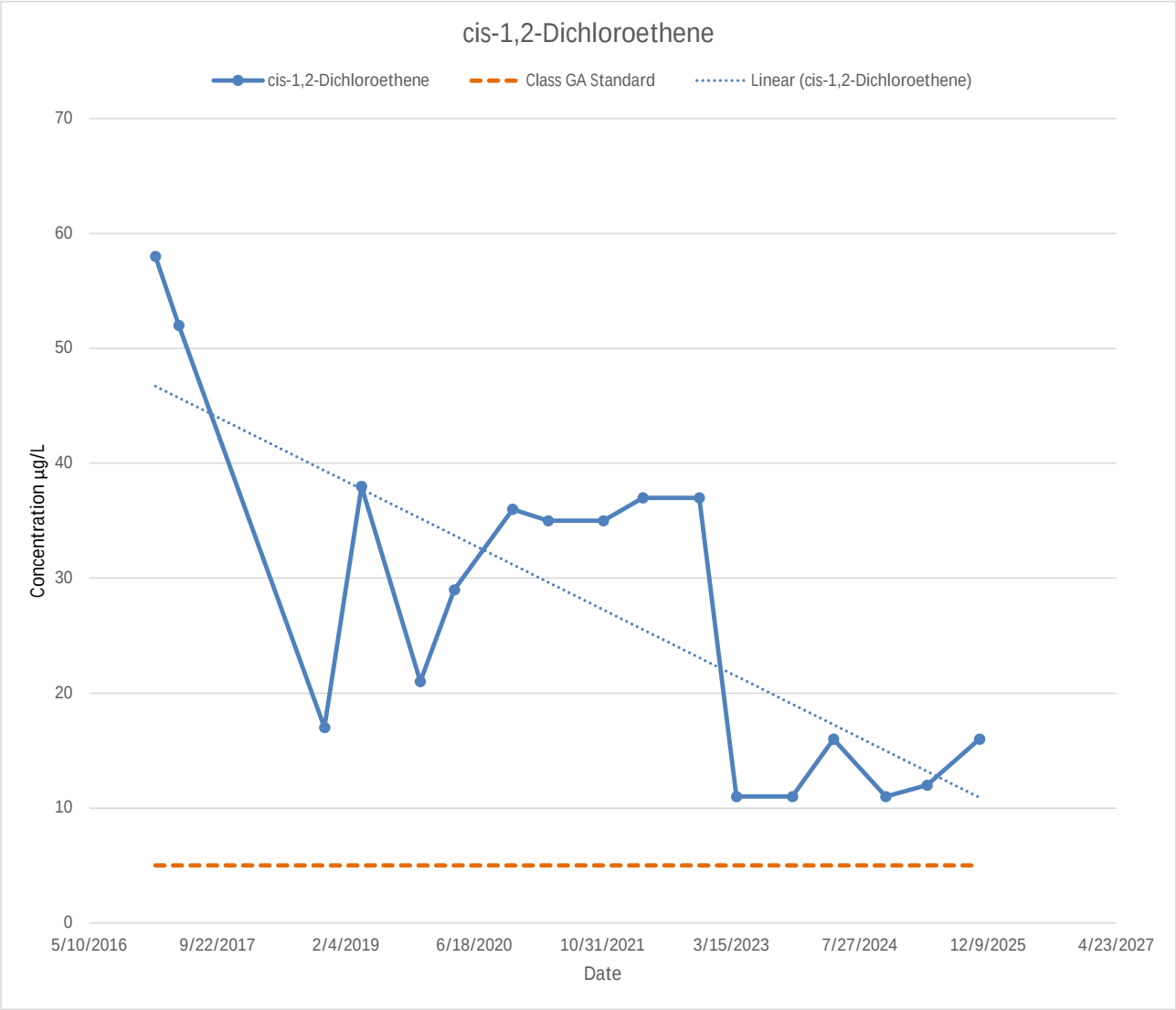
Table 5
PZ-4R Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



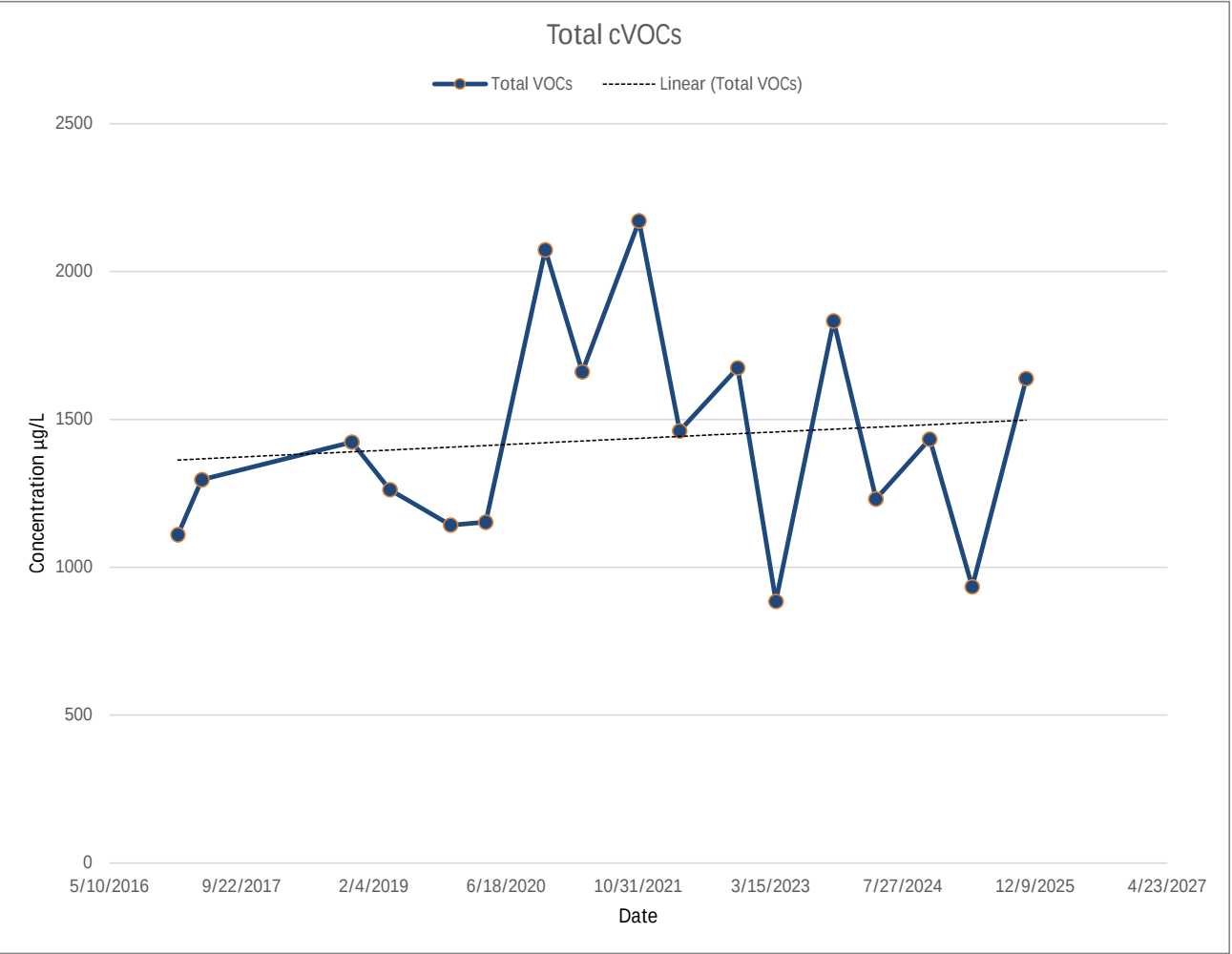
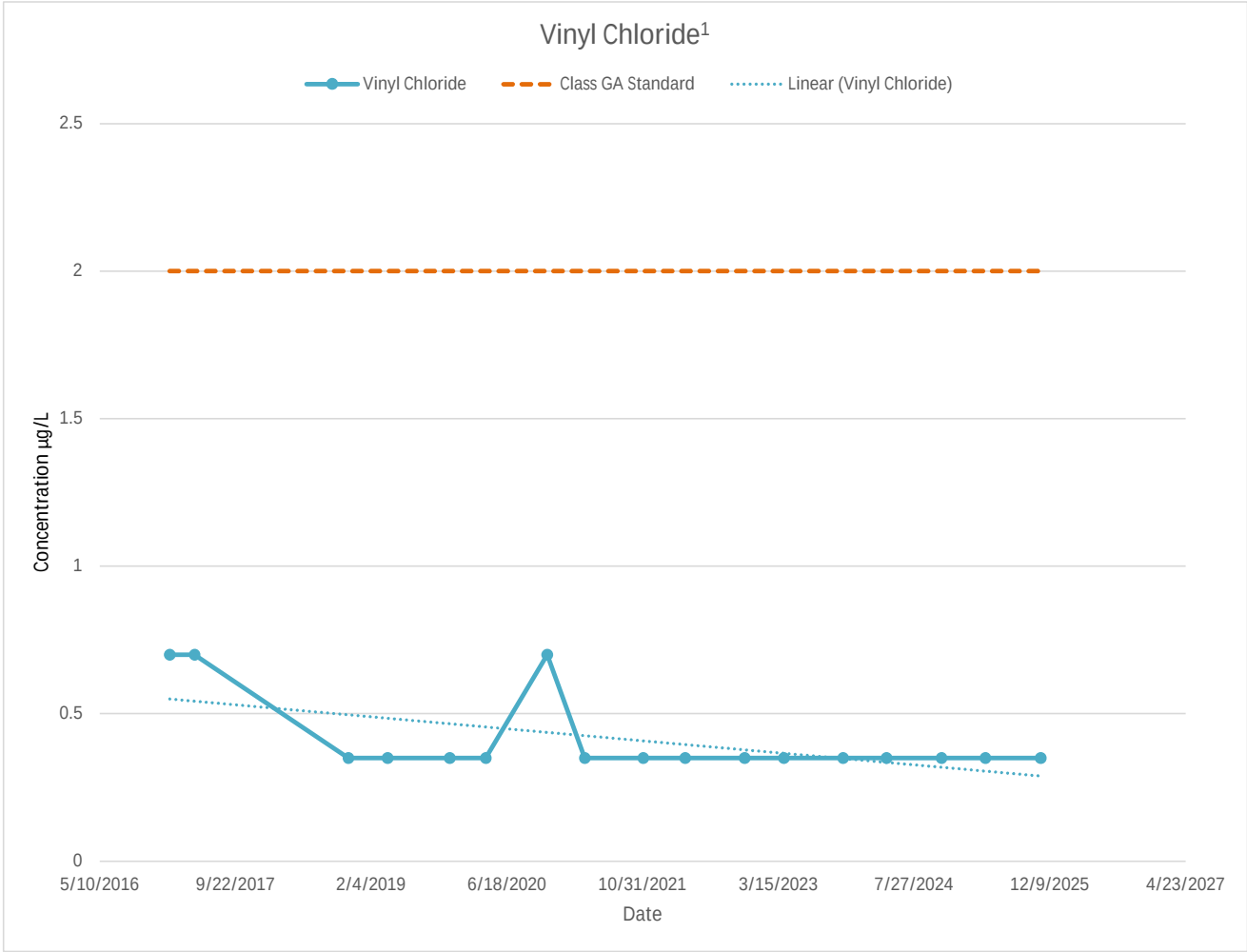
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PZ-4R Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



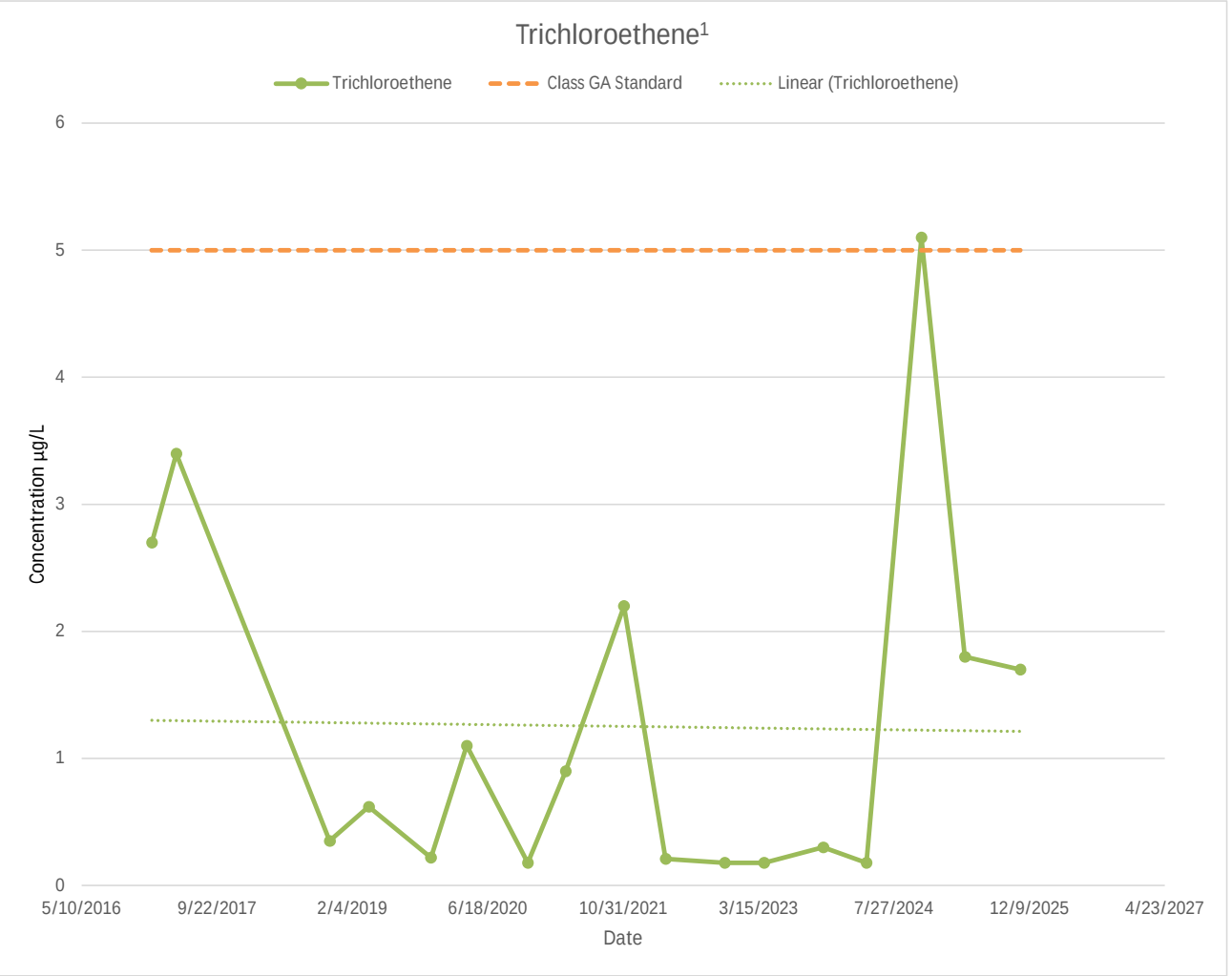
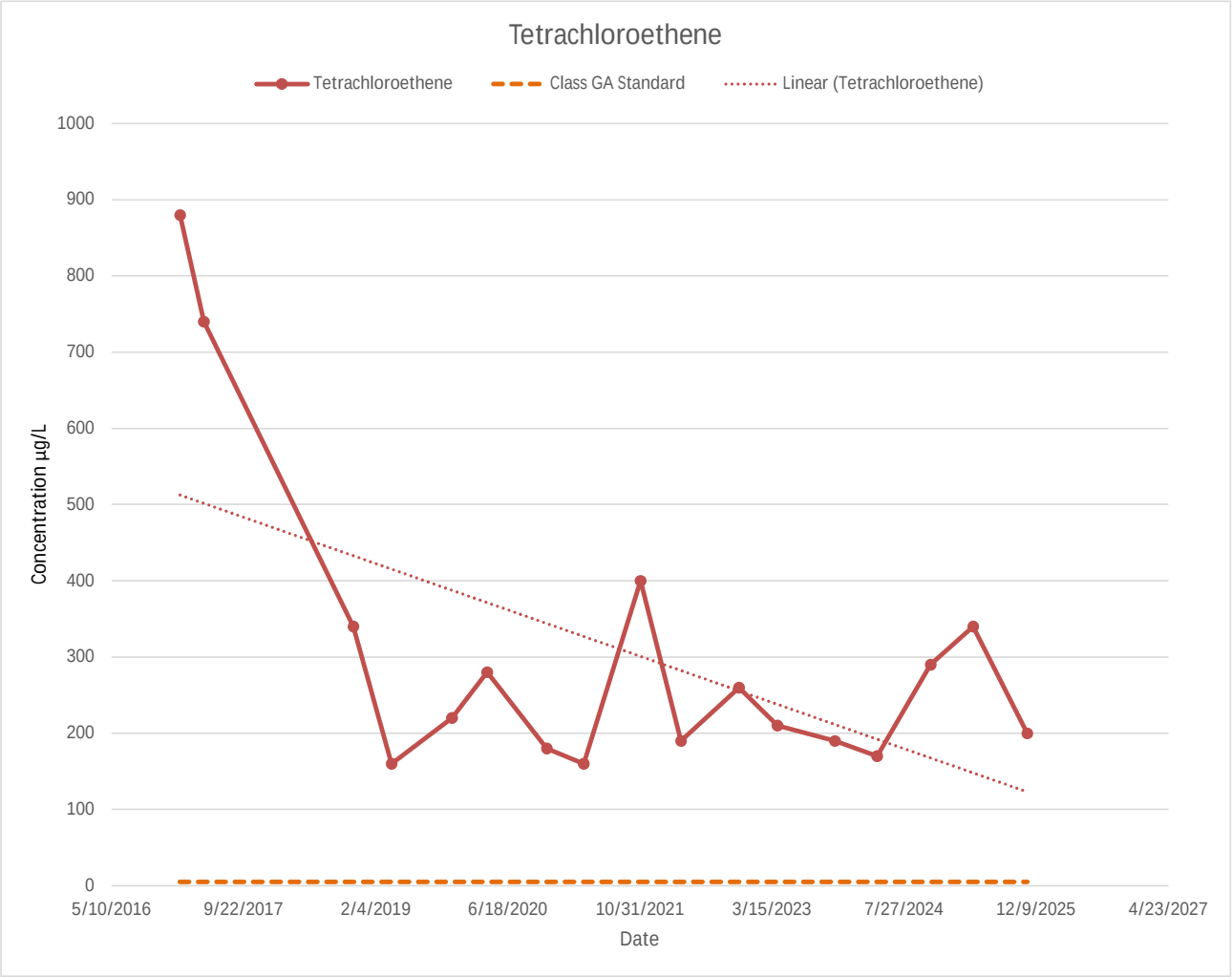
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PZ-4R Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



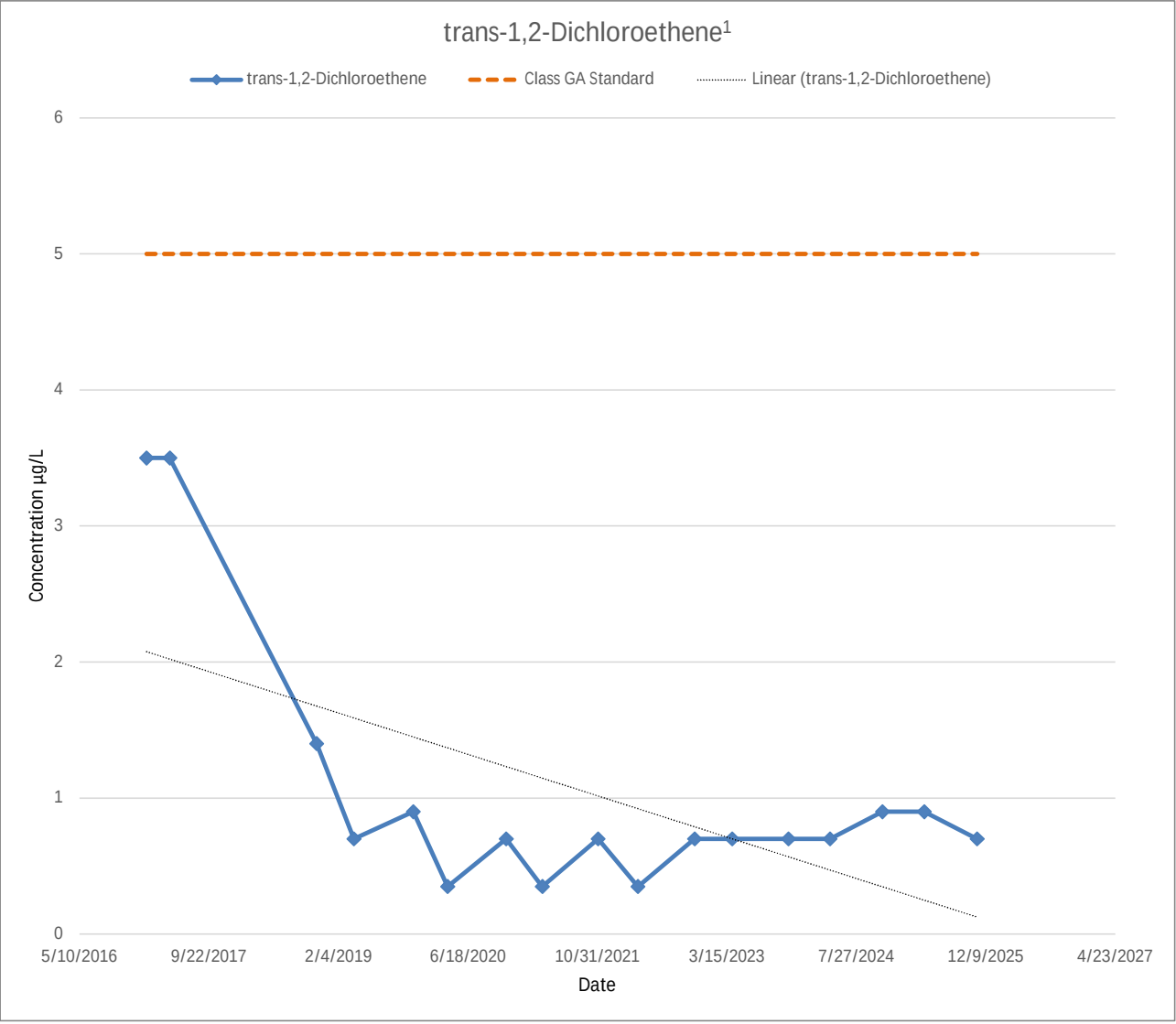
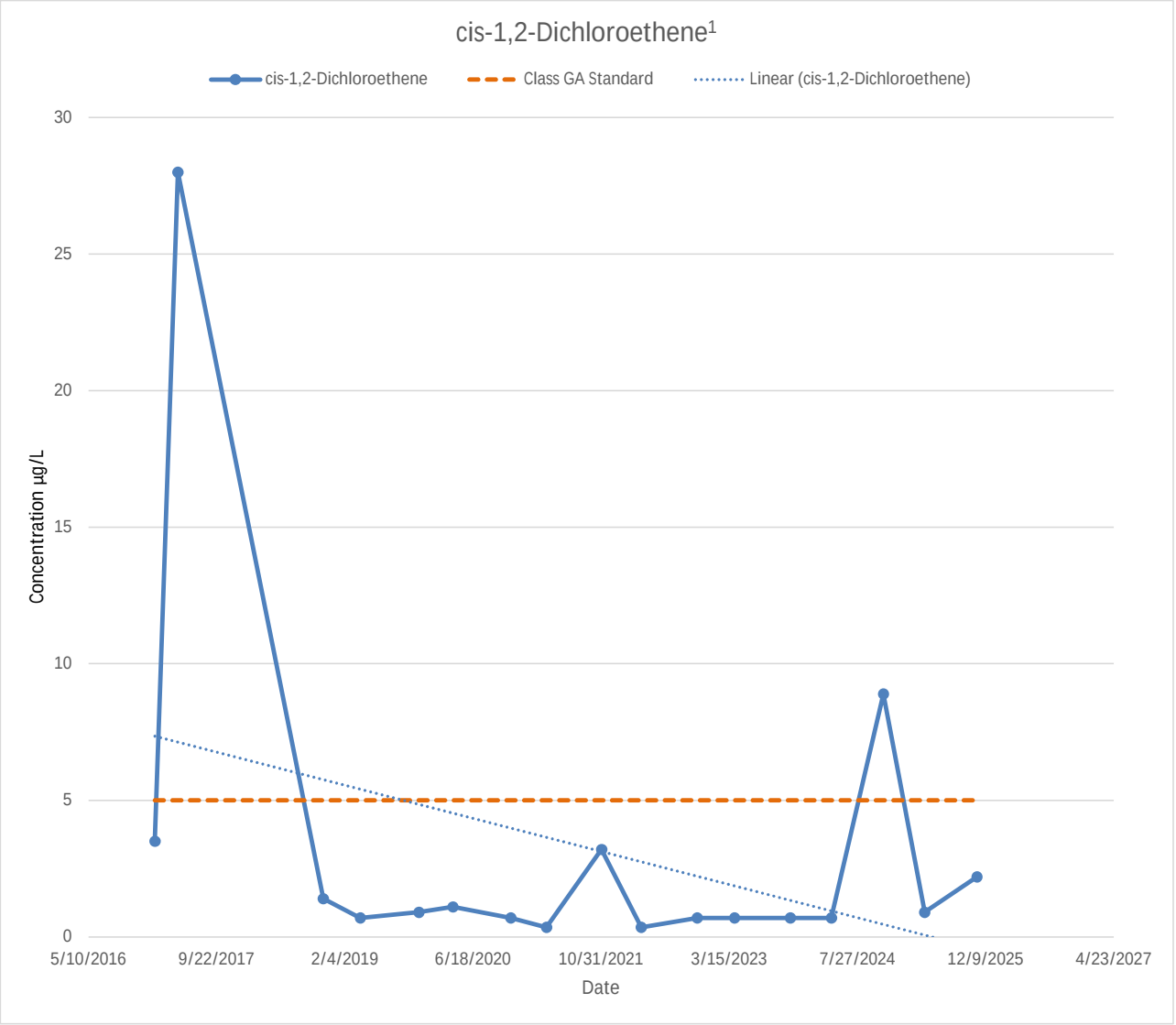
Table 6
PZ-5 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



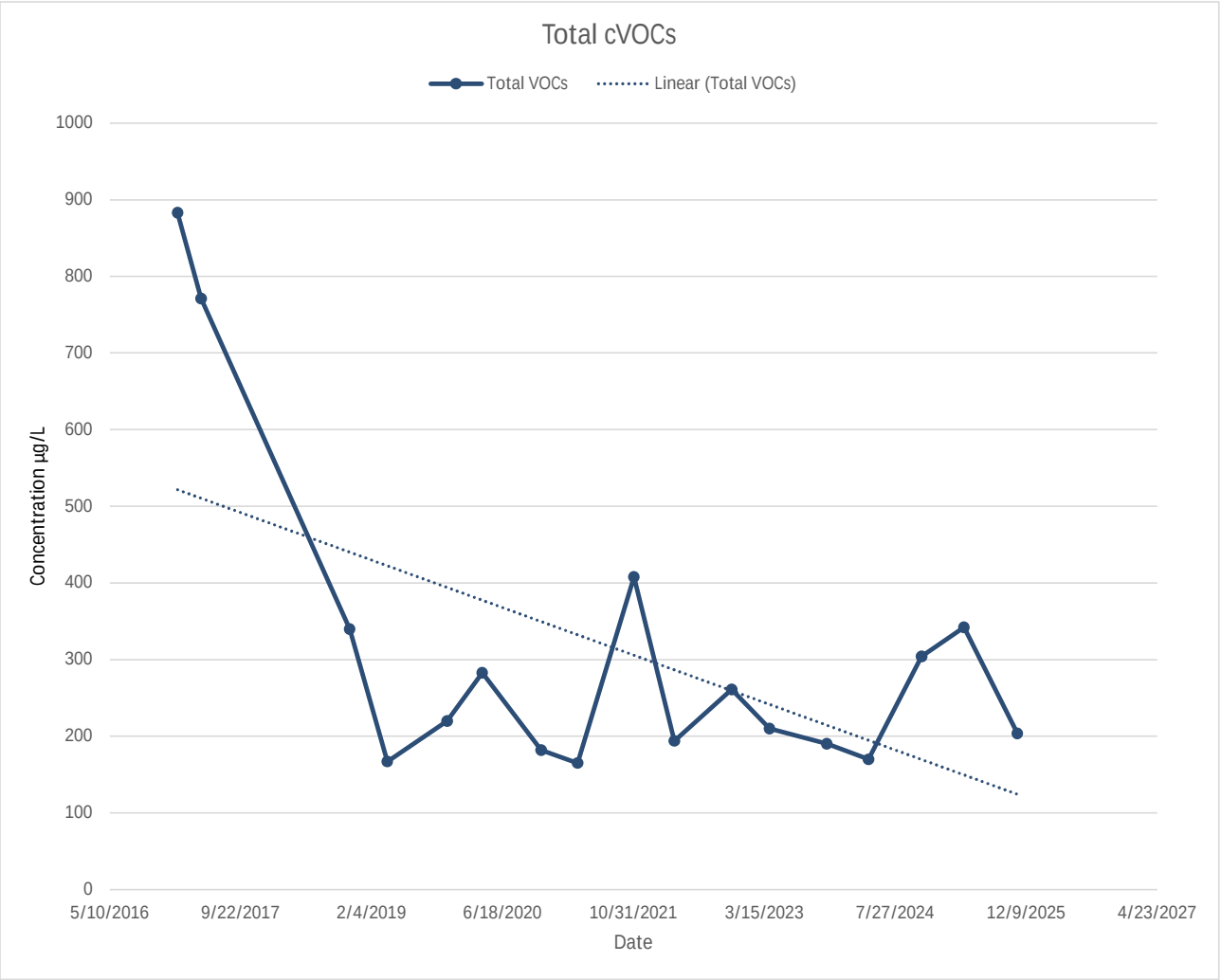
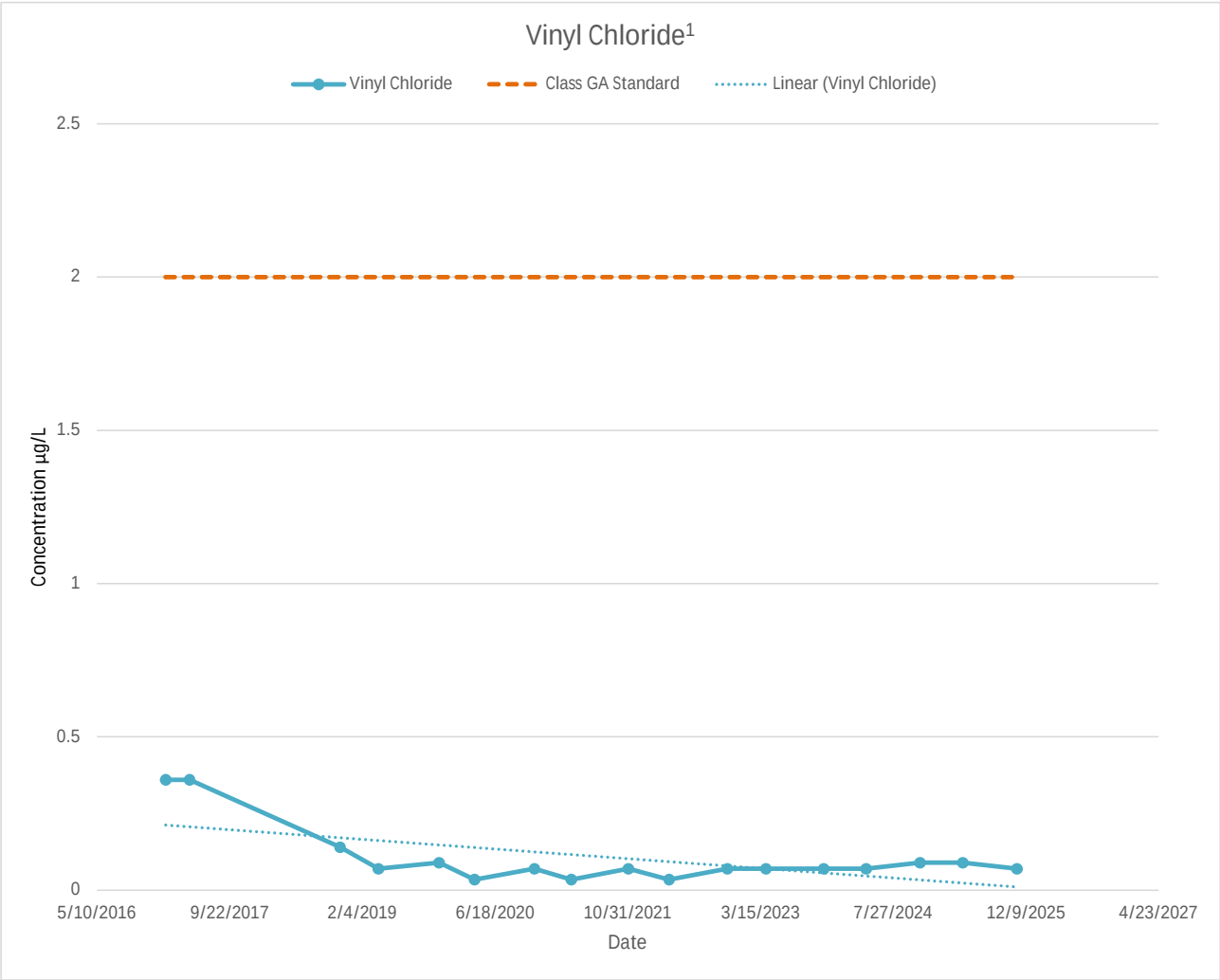
Table 6
PZ-5 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



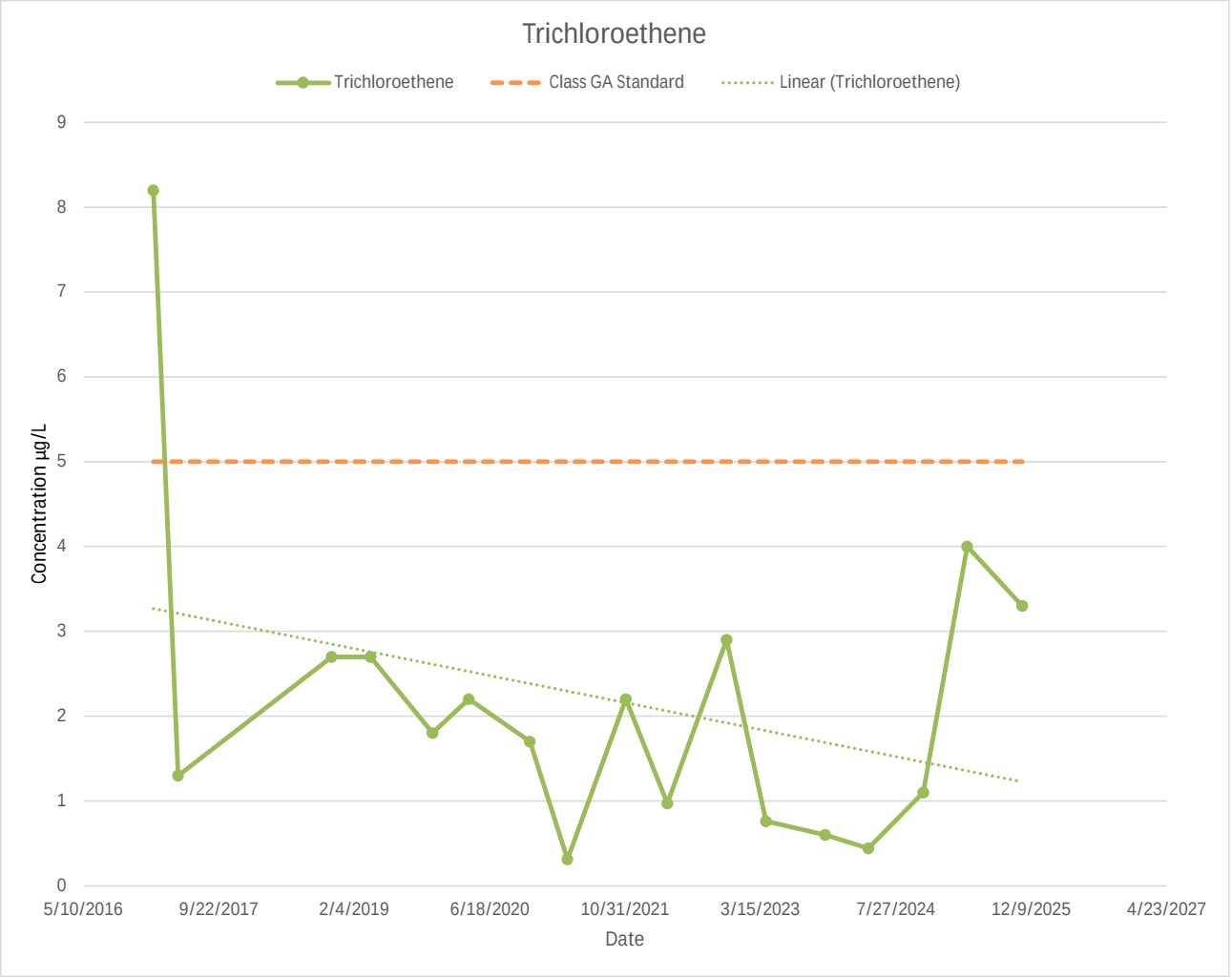
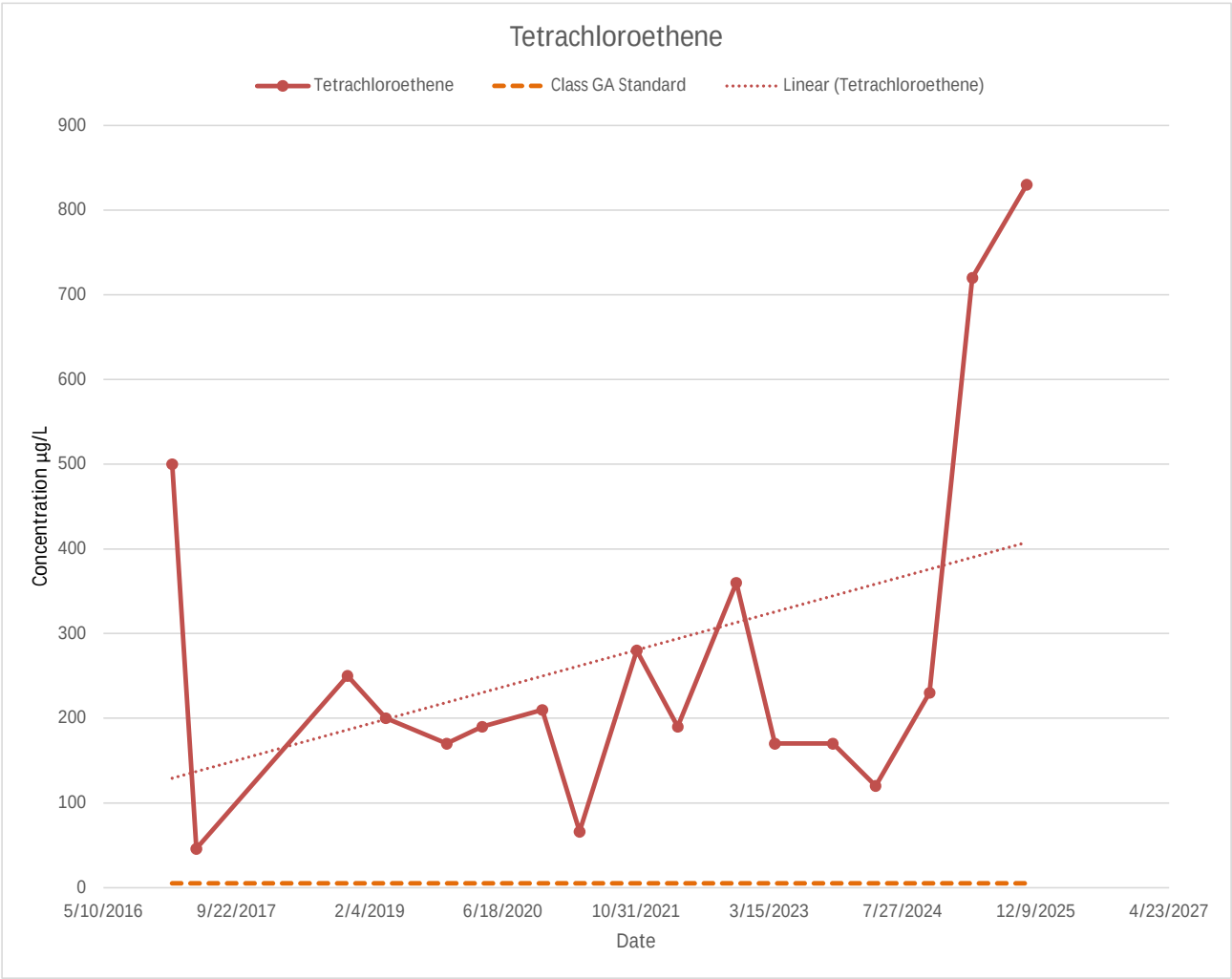
Table 6
PZ-5 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



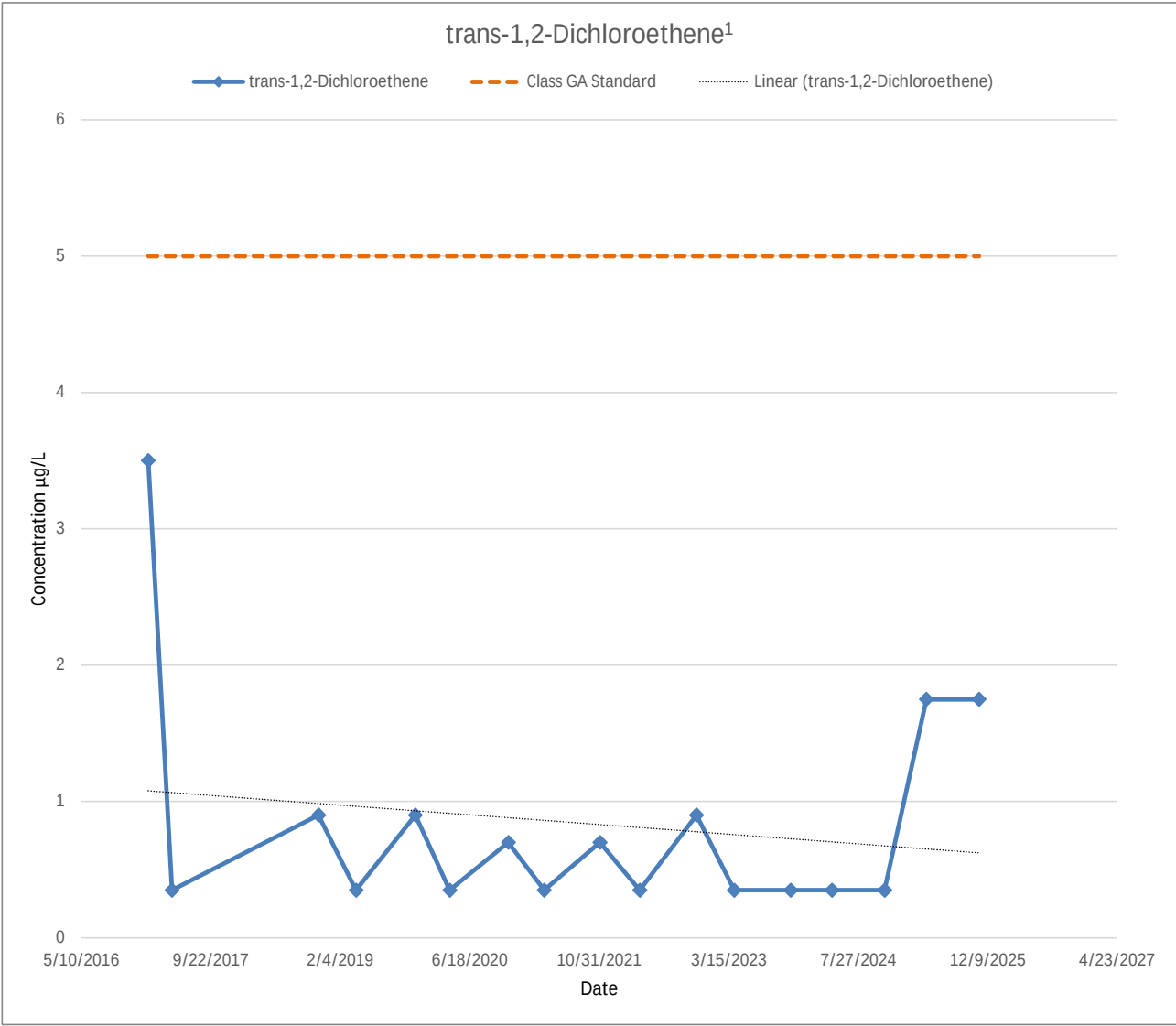
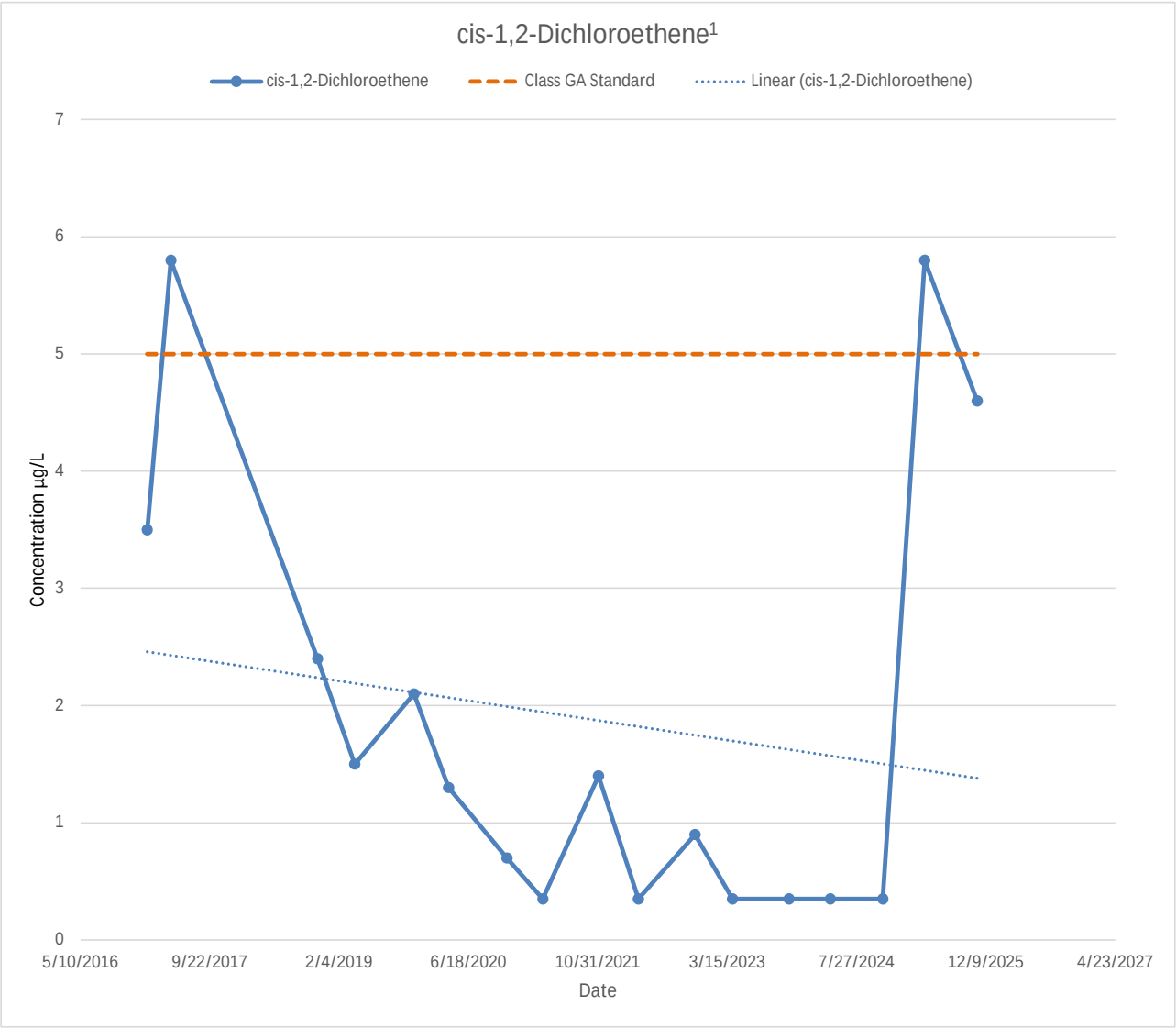
Table 7
PZ-6 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



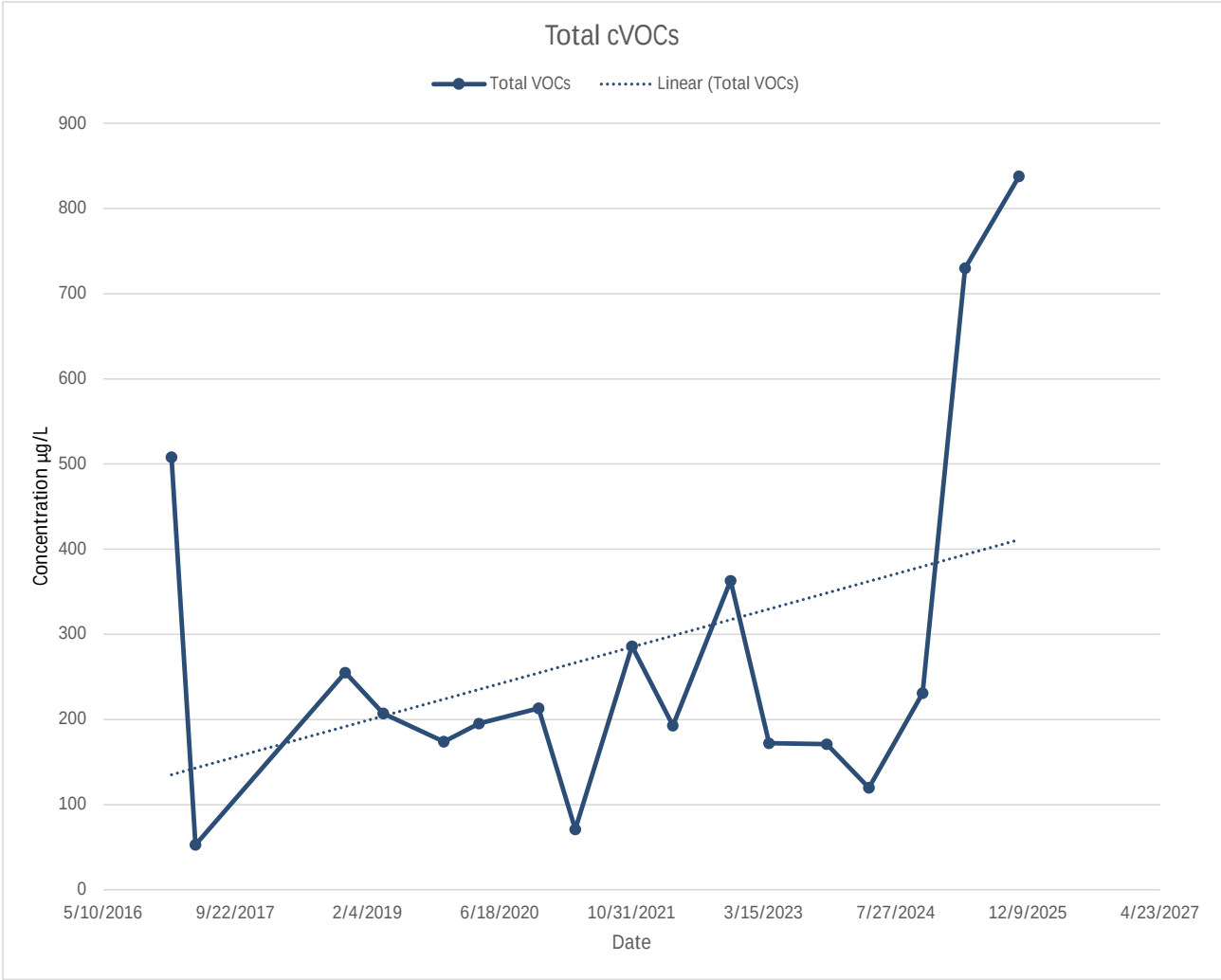
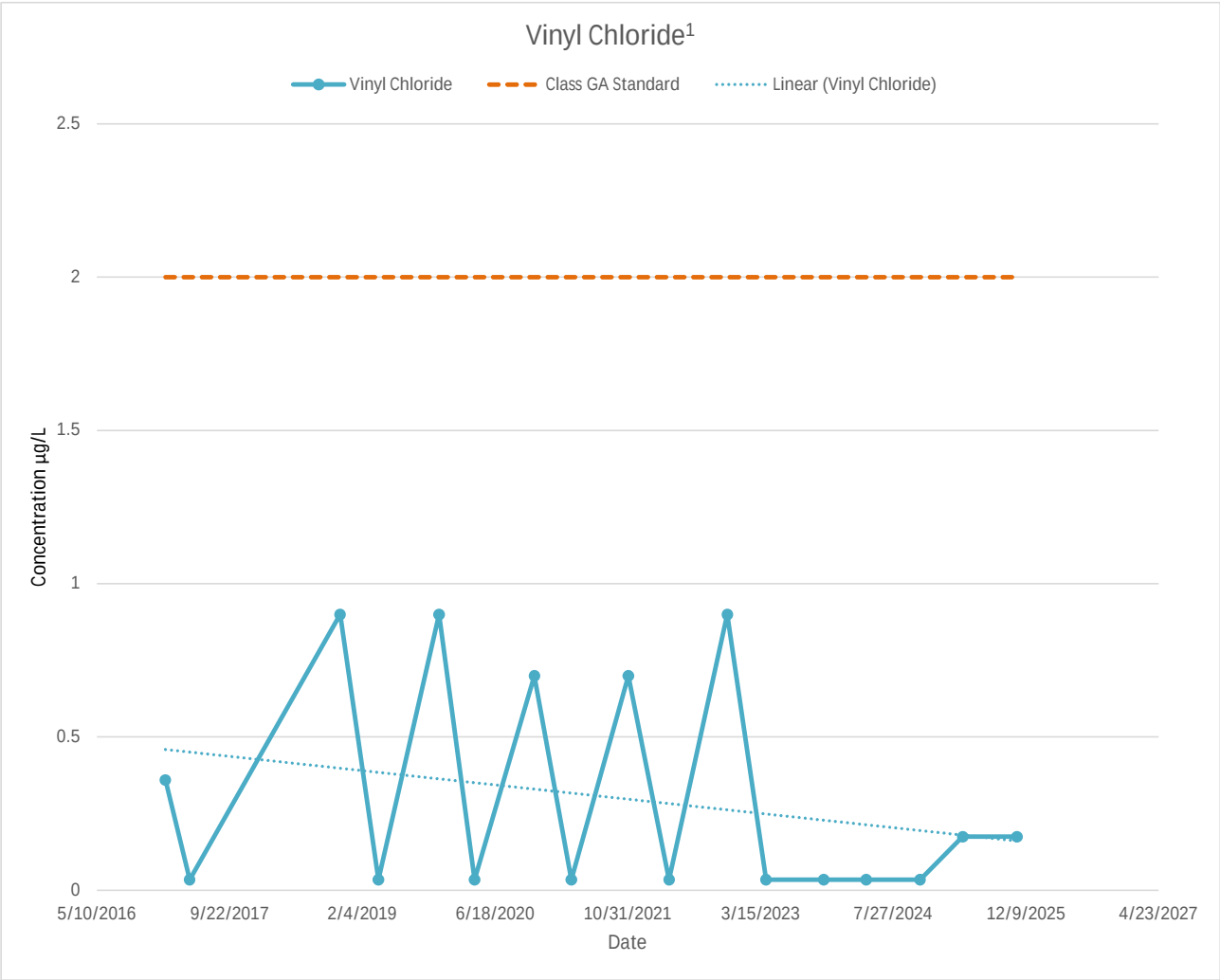
Table 7
PZ-6 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



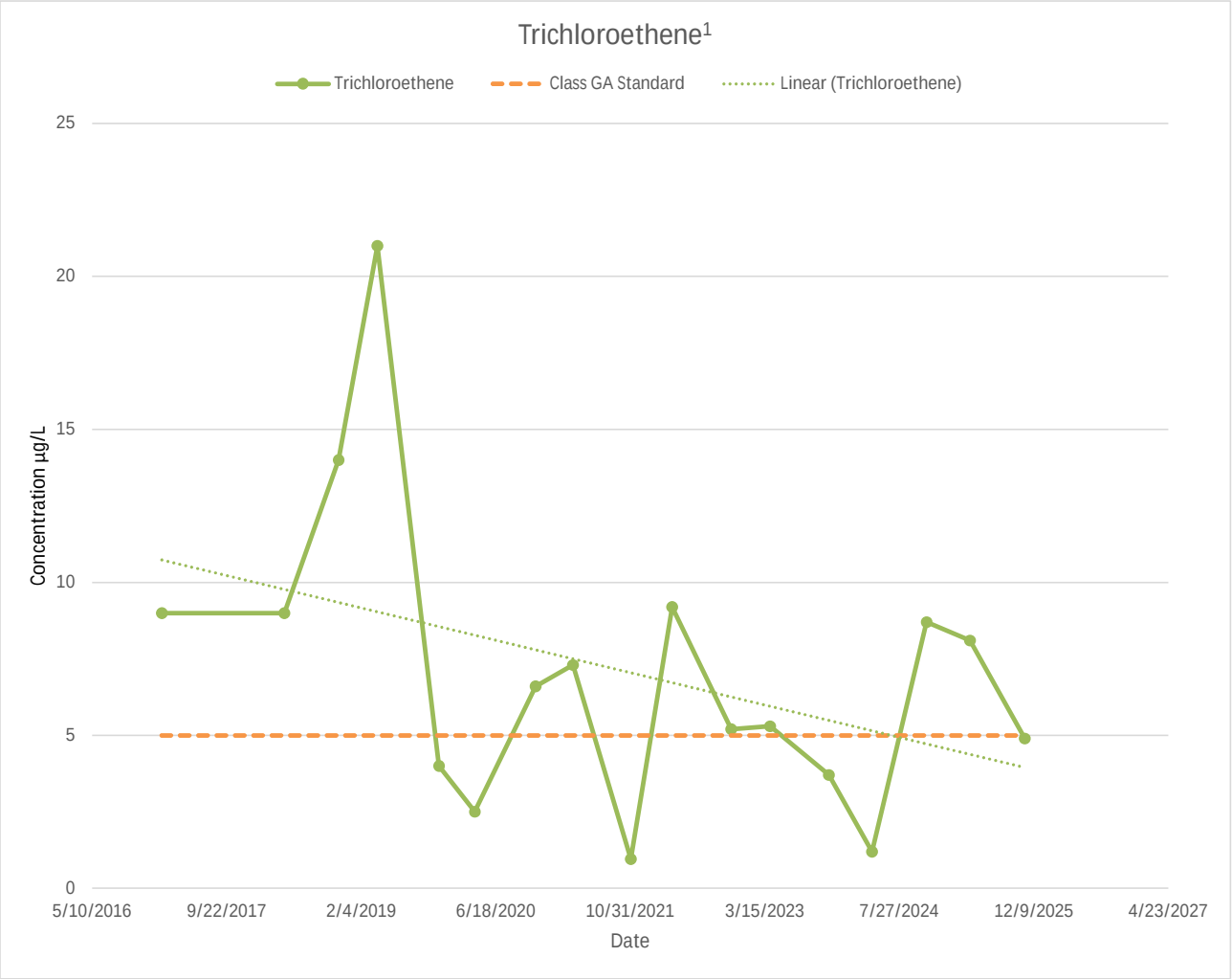
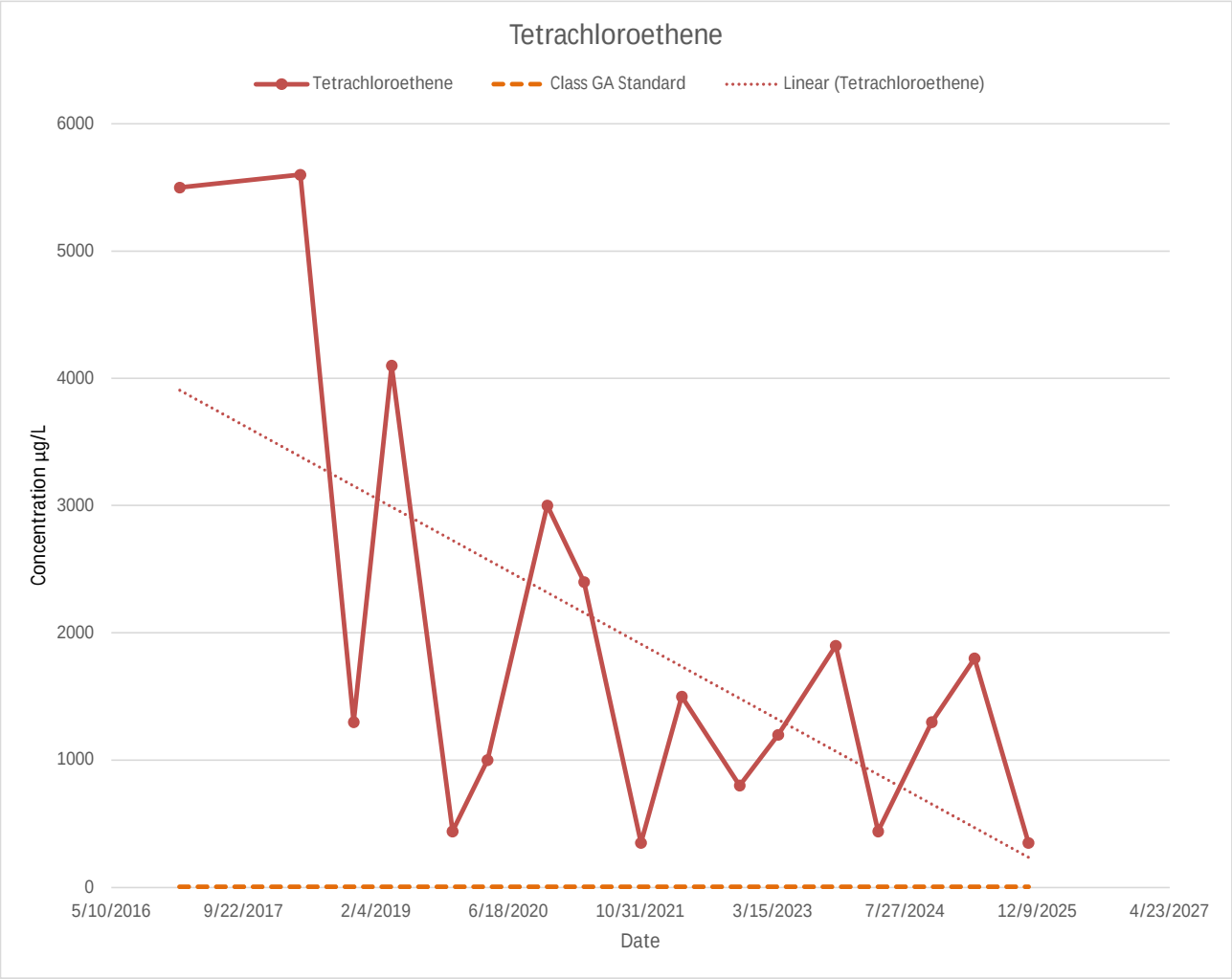
Table 7
PZ-6 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



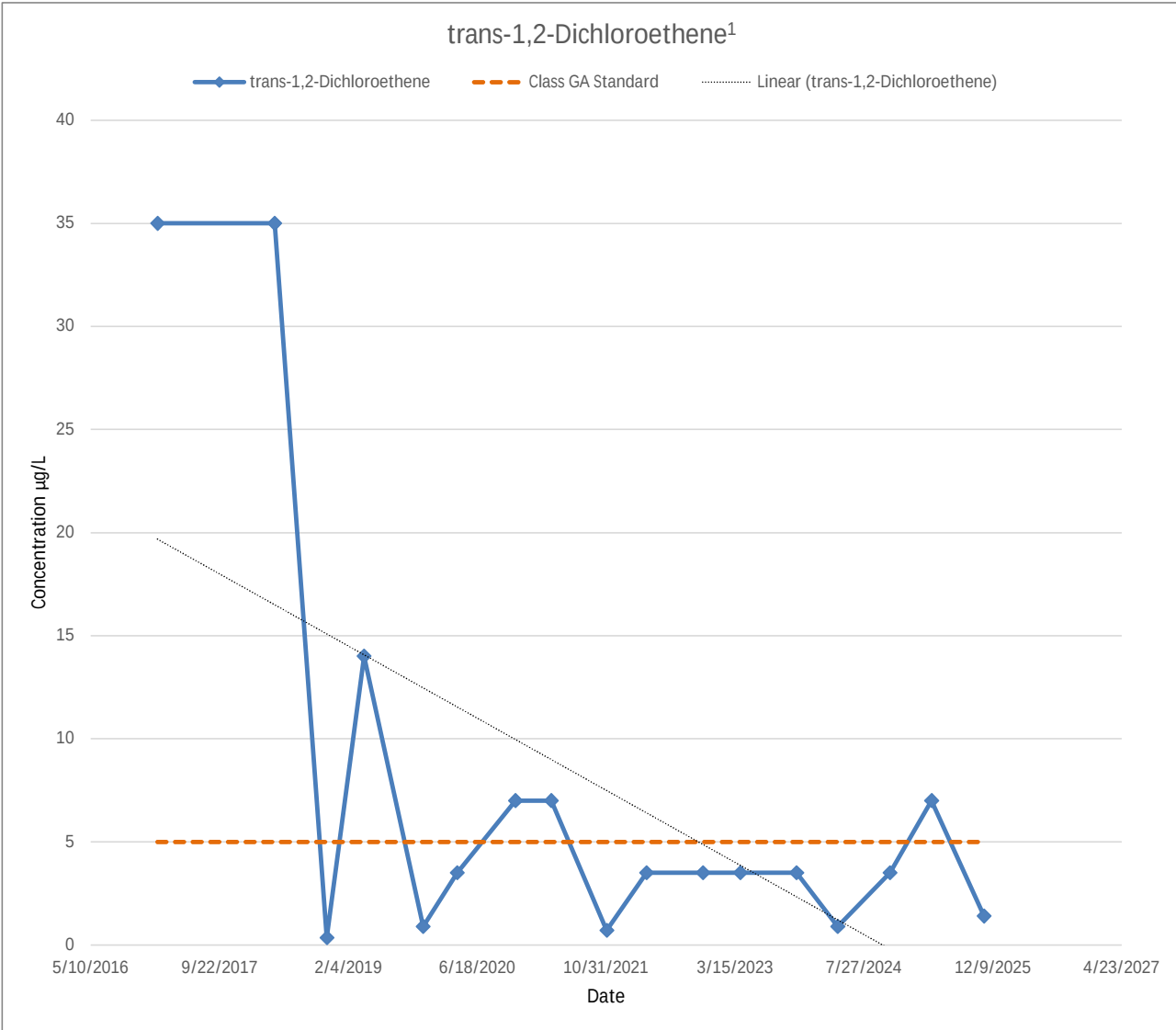
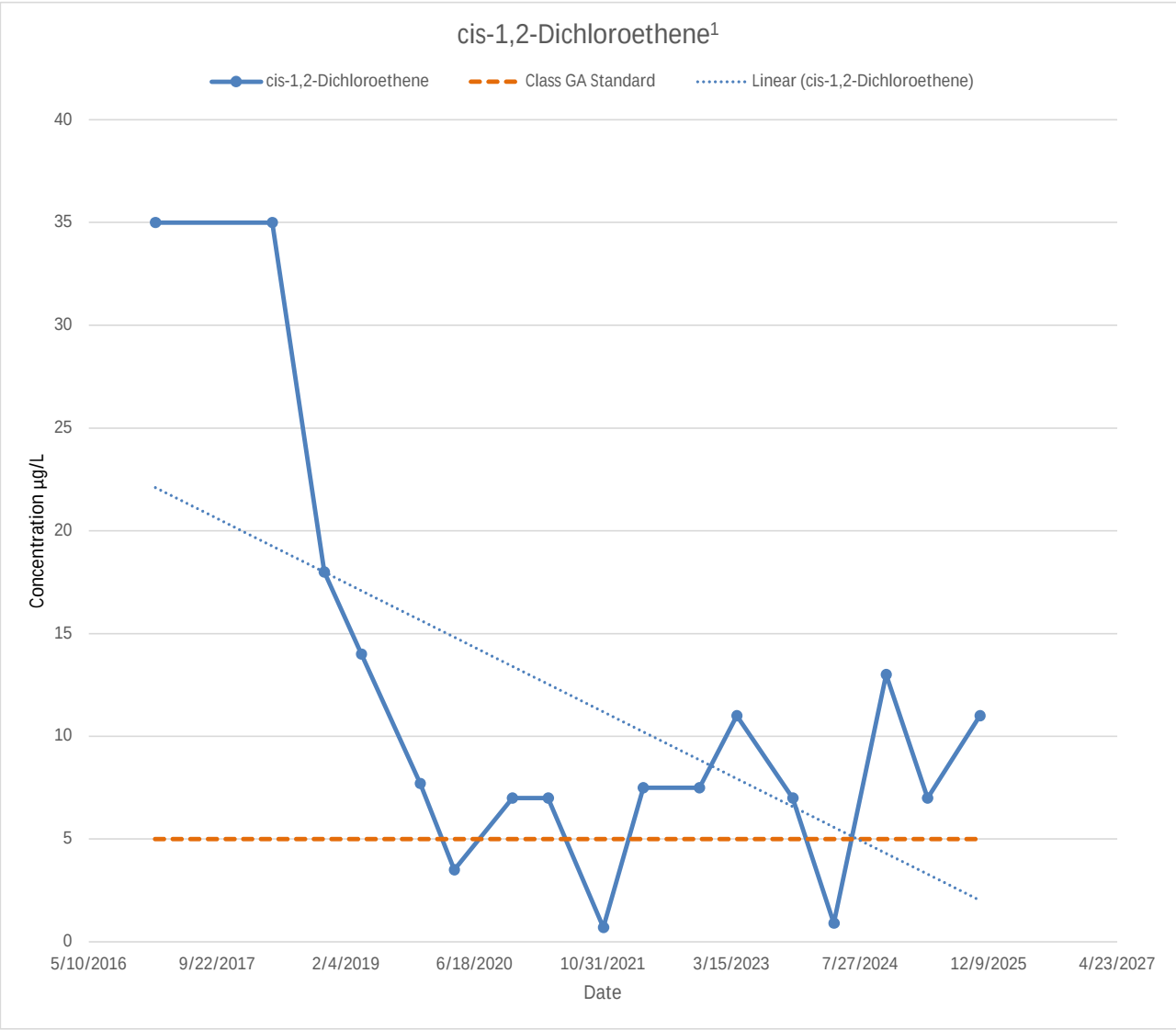
Table 8
PZ-11 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



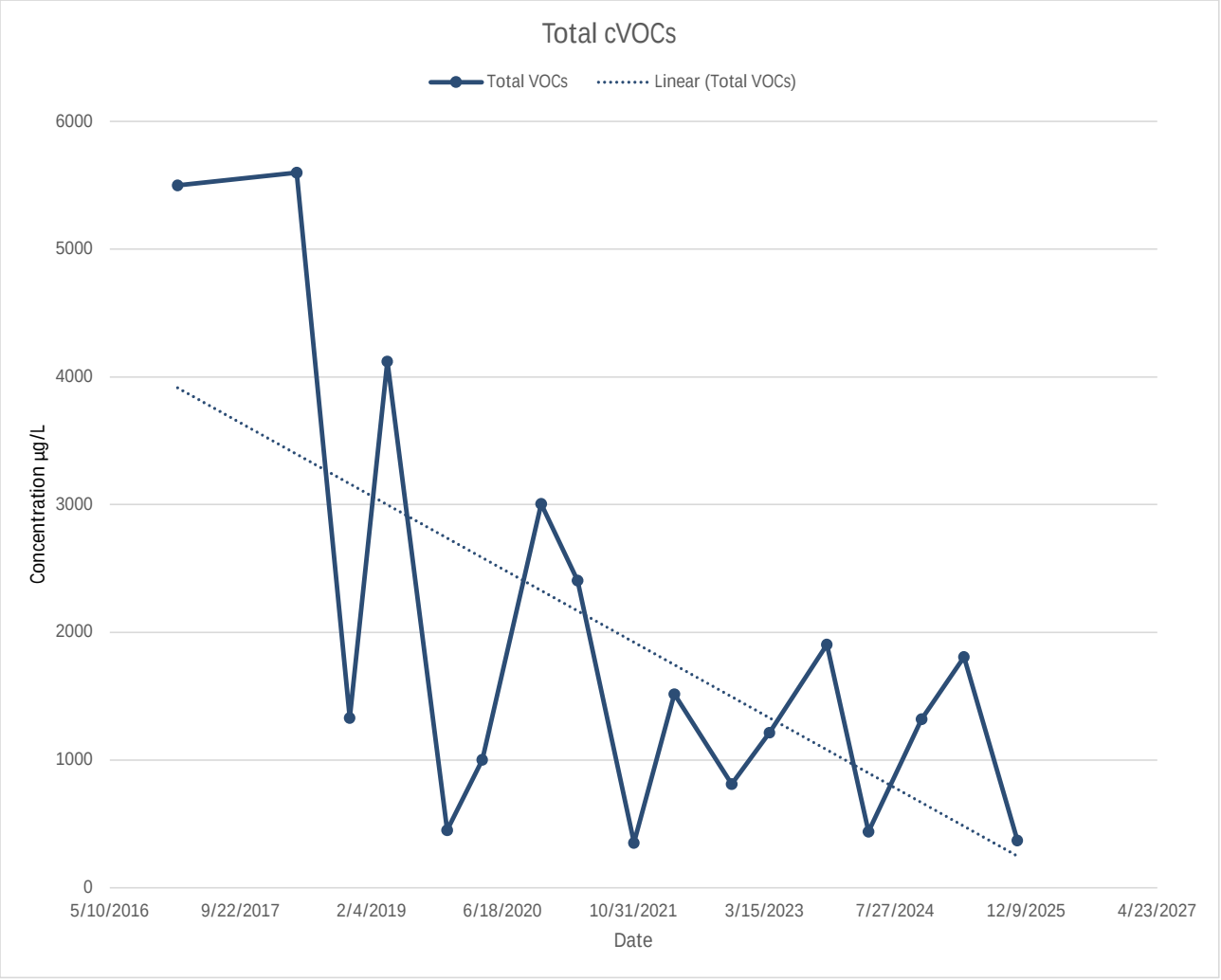
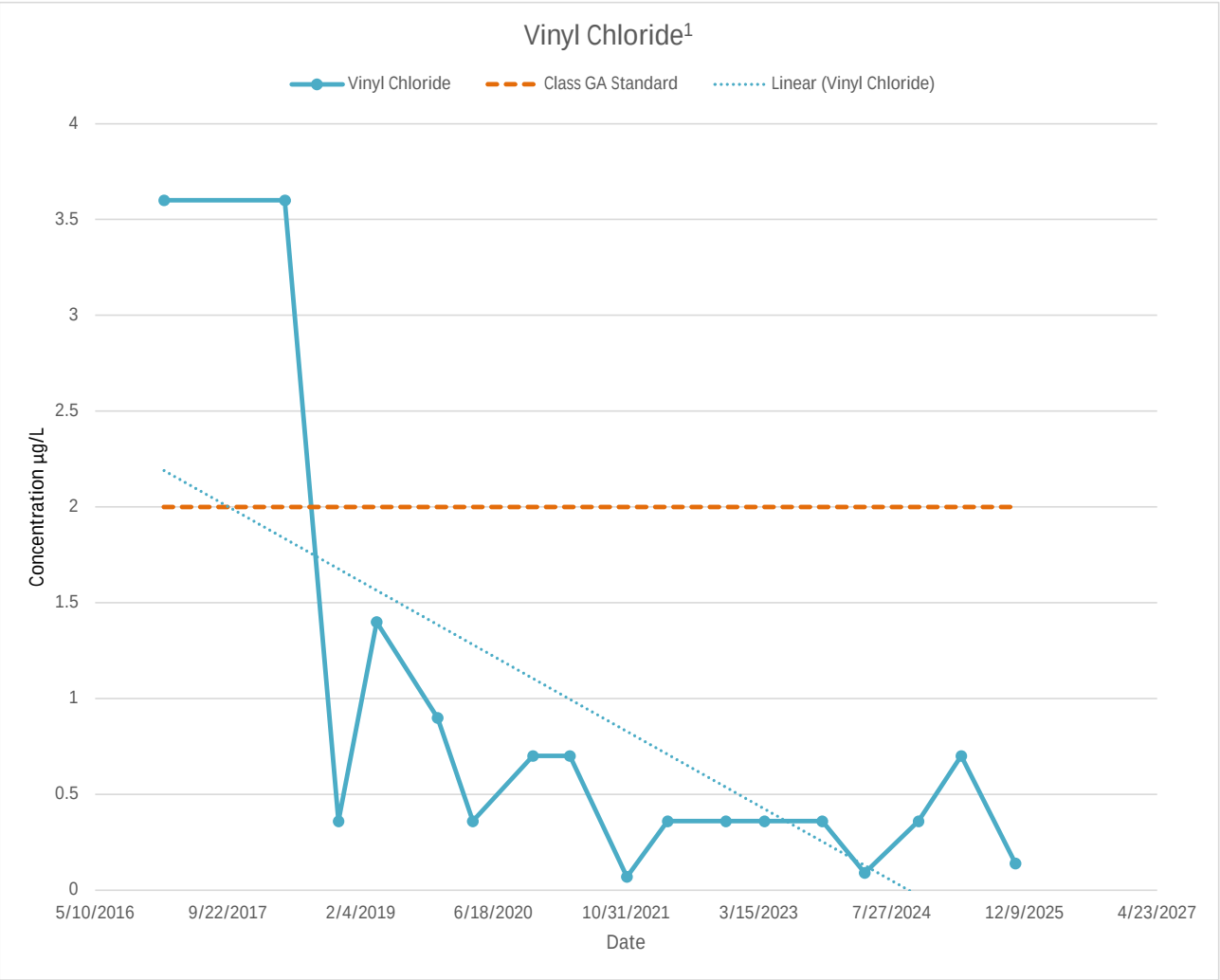
Table 8
PZ-11 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



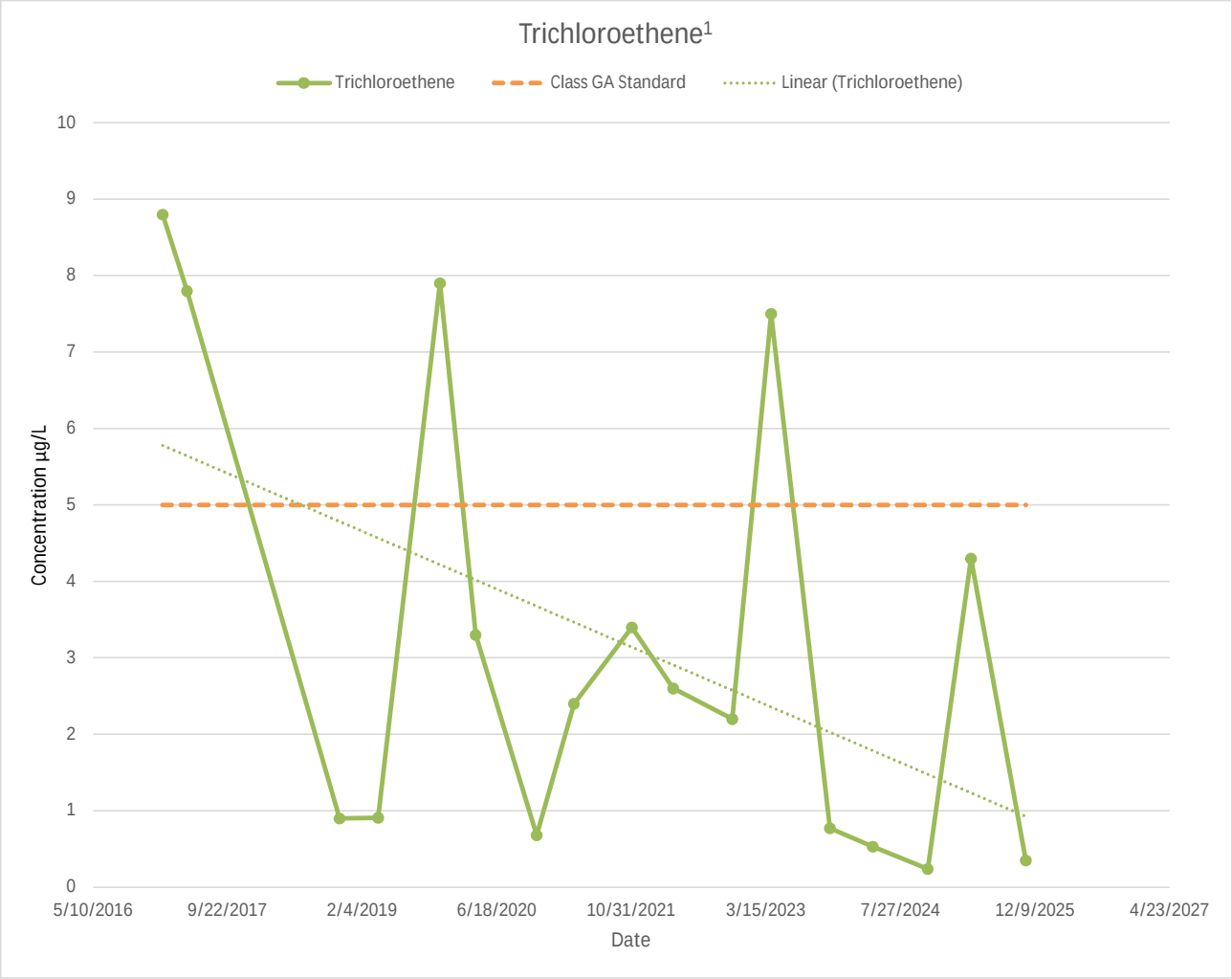
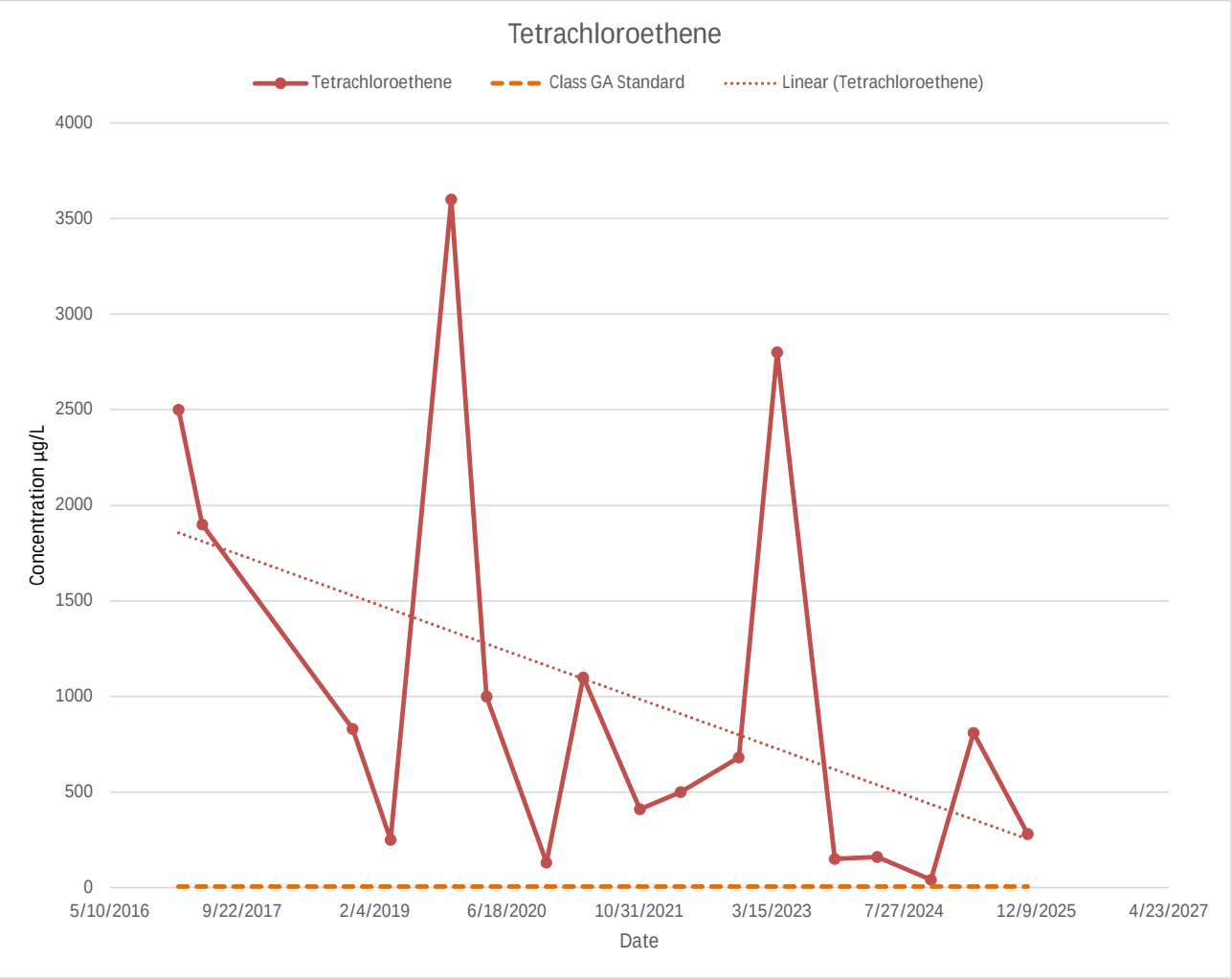
Table 8
PZ-11 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



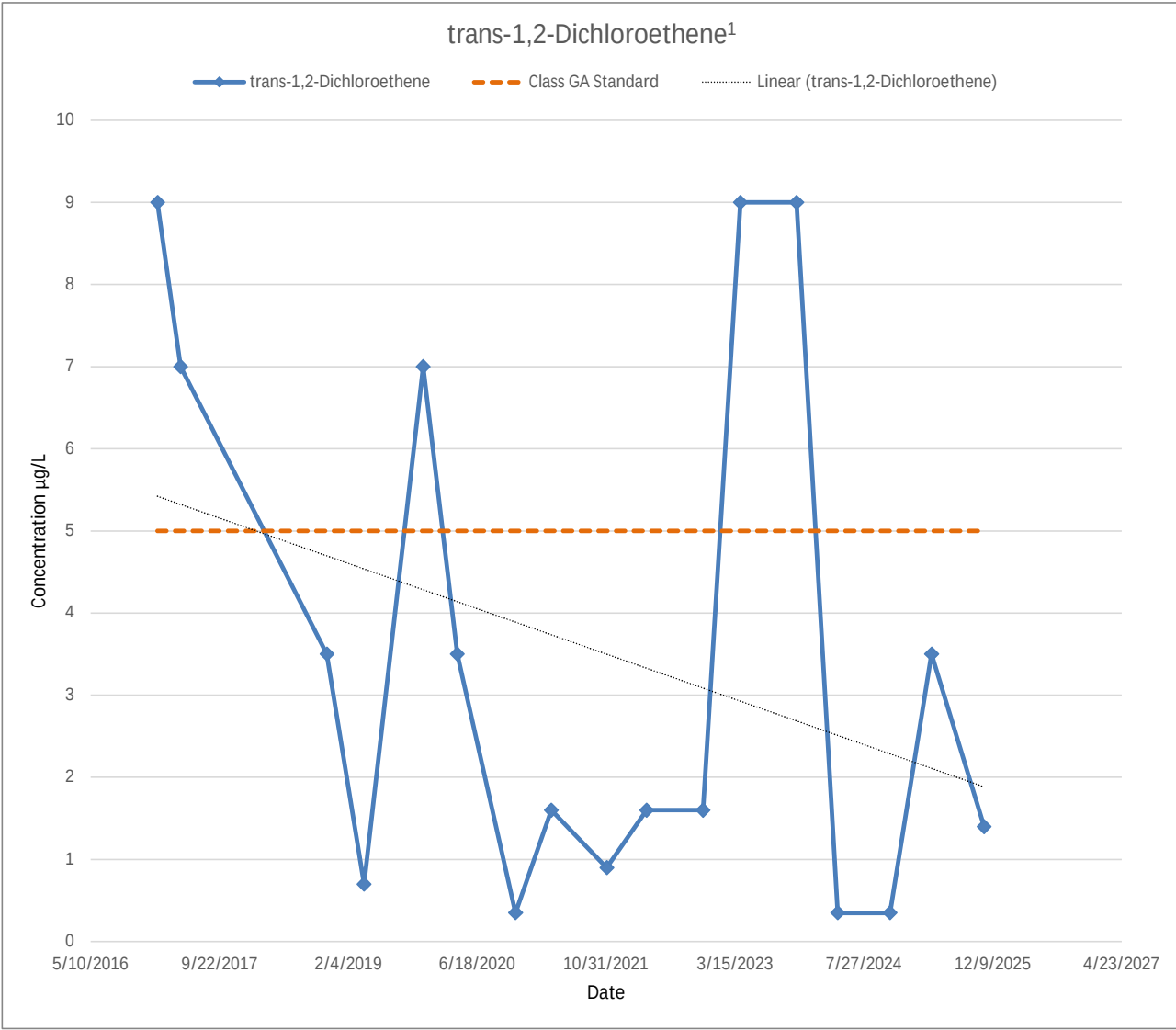
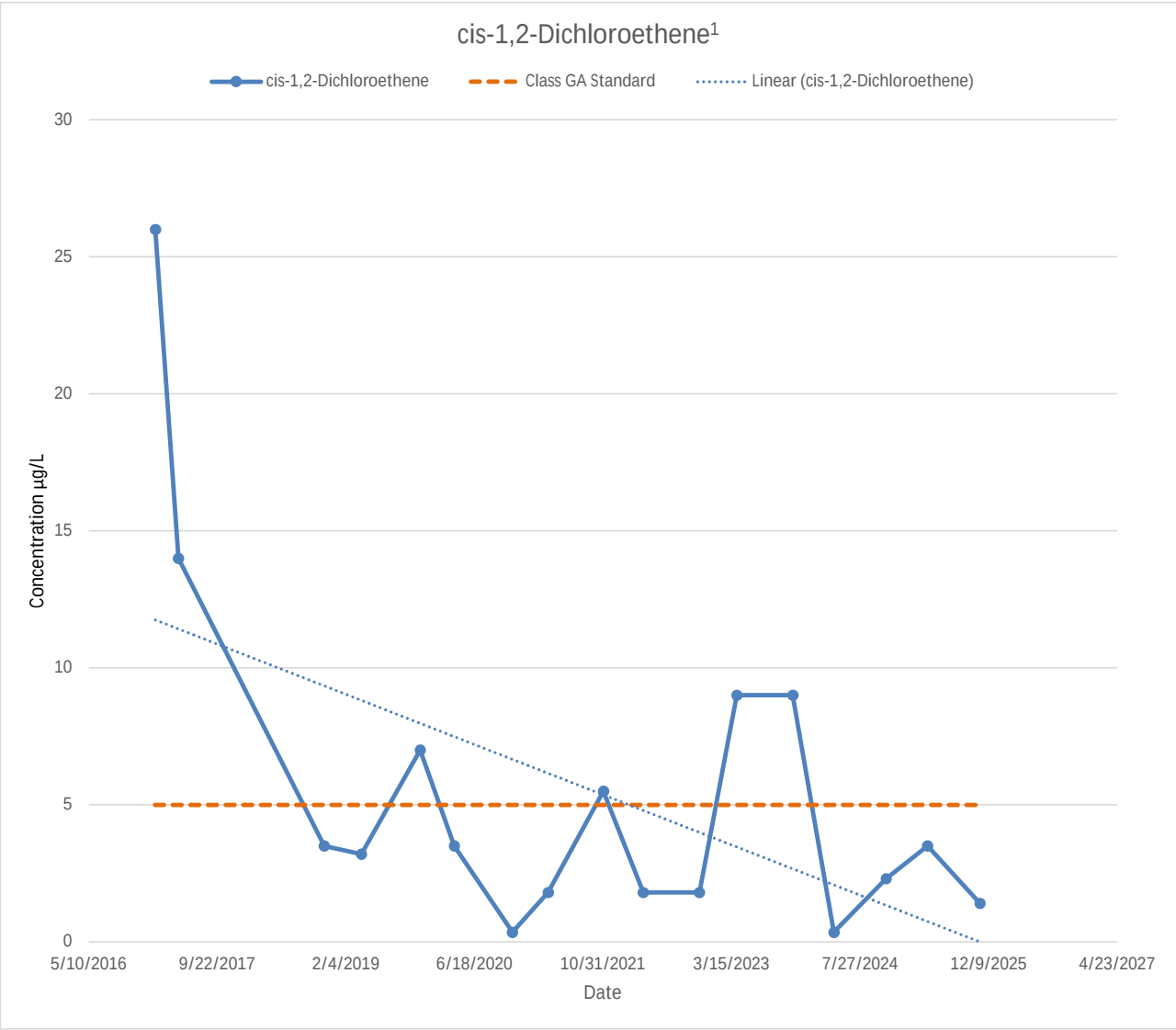
Table 9
PZ-12 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



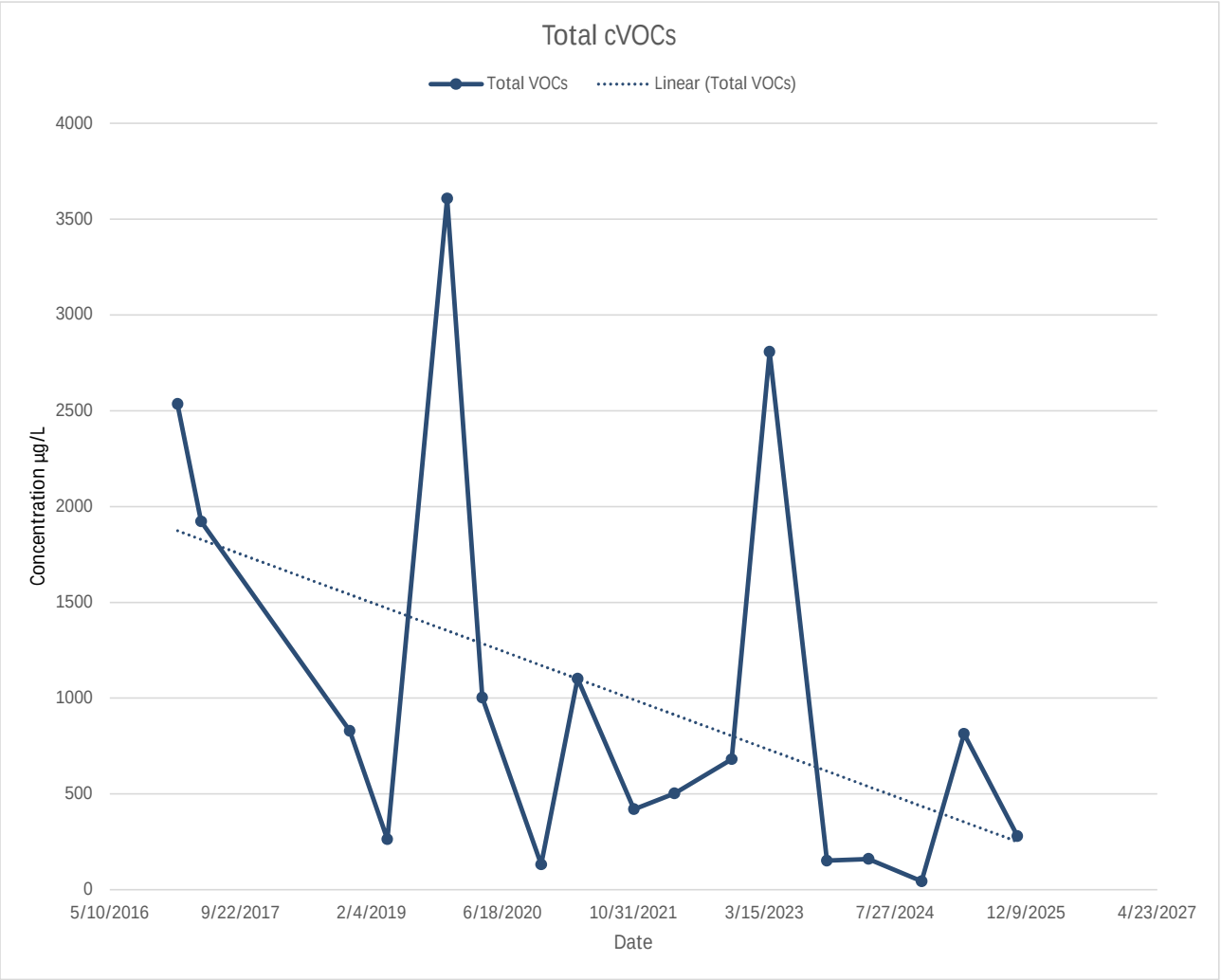
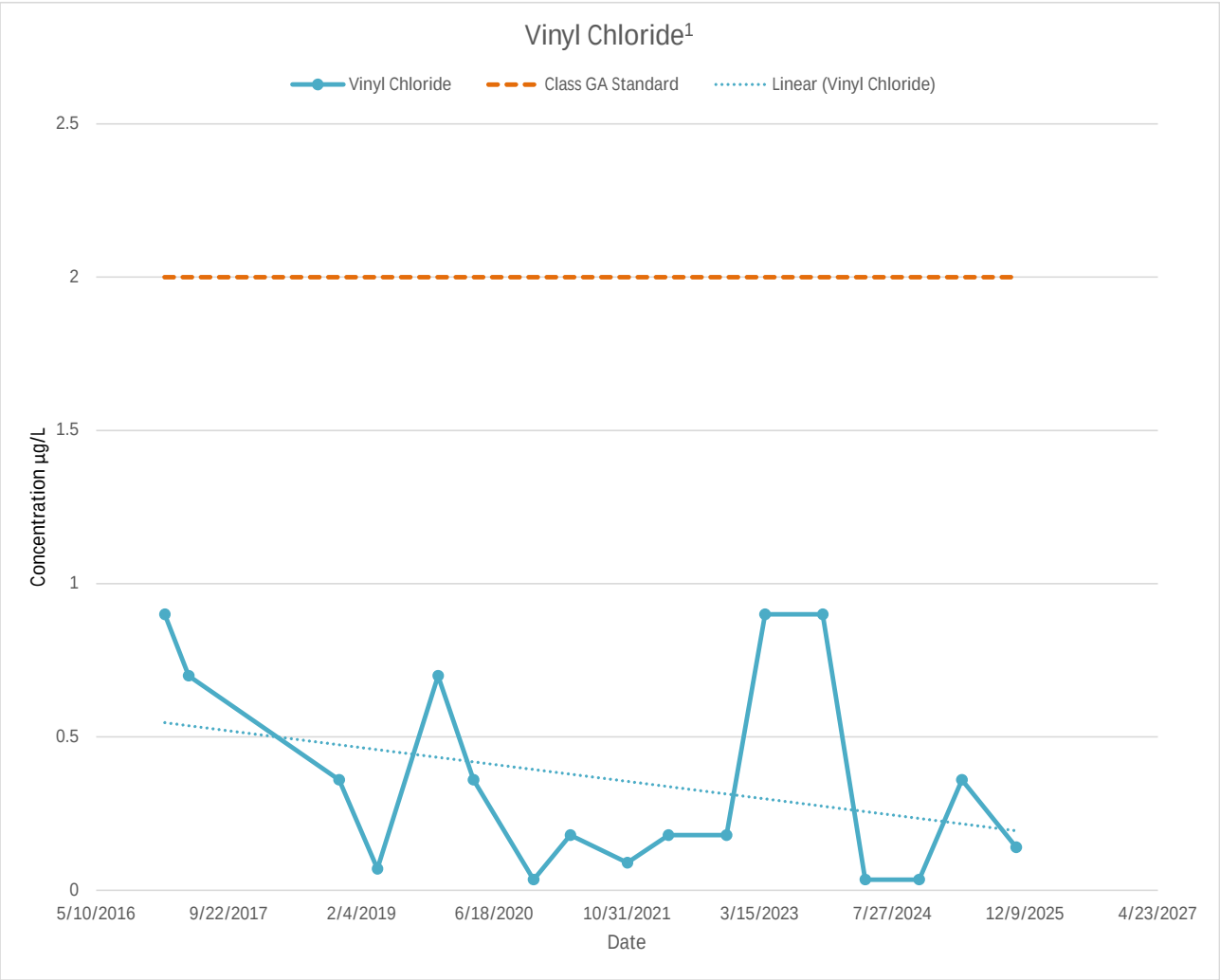
Table 9
PZ-12 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



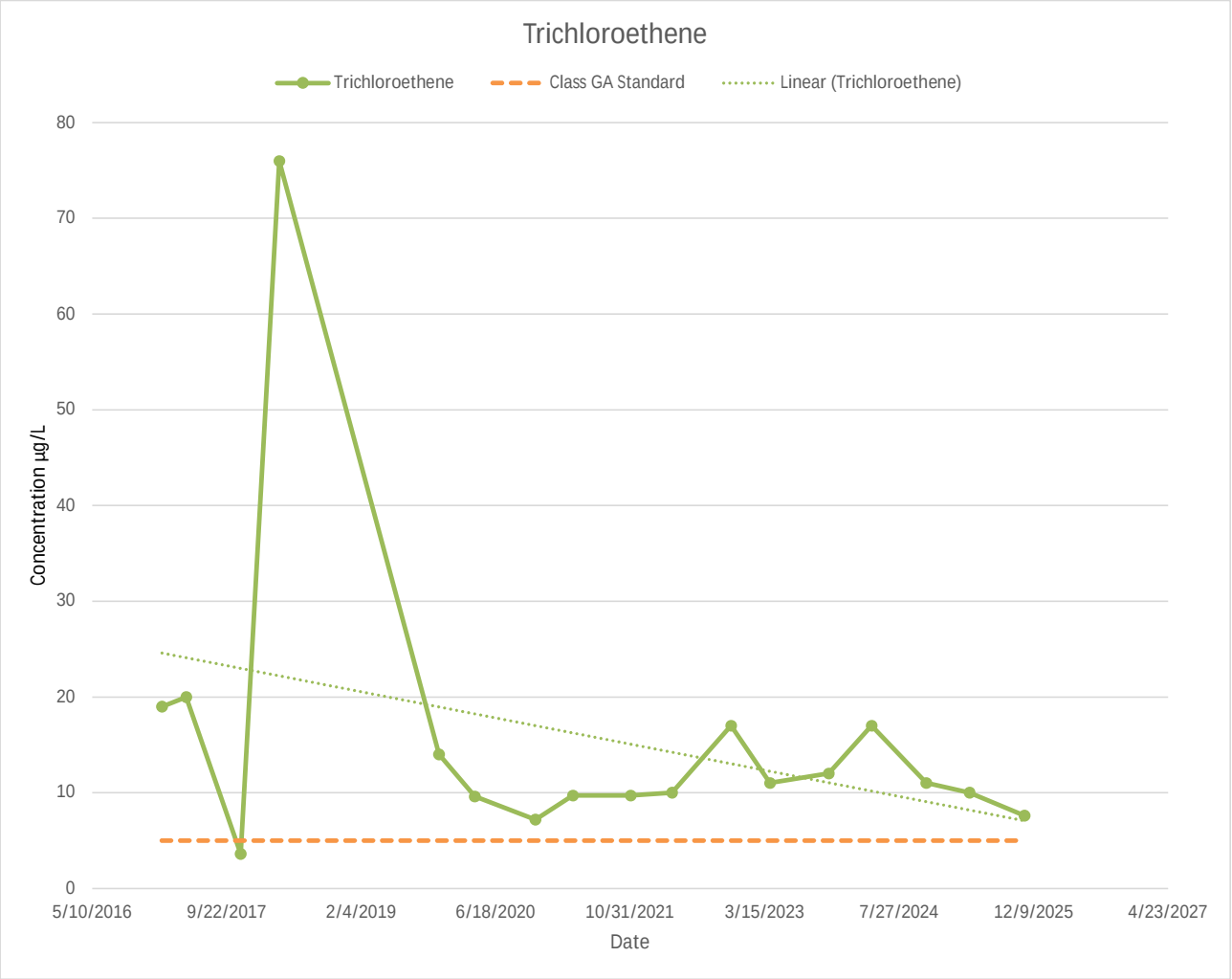
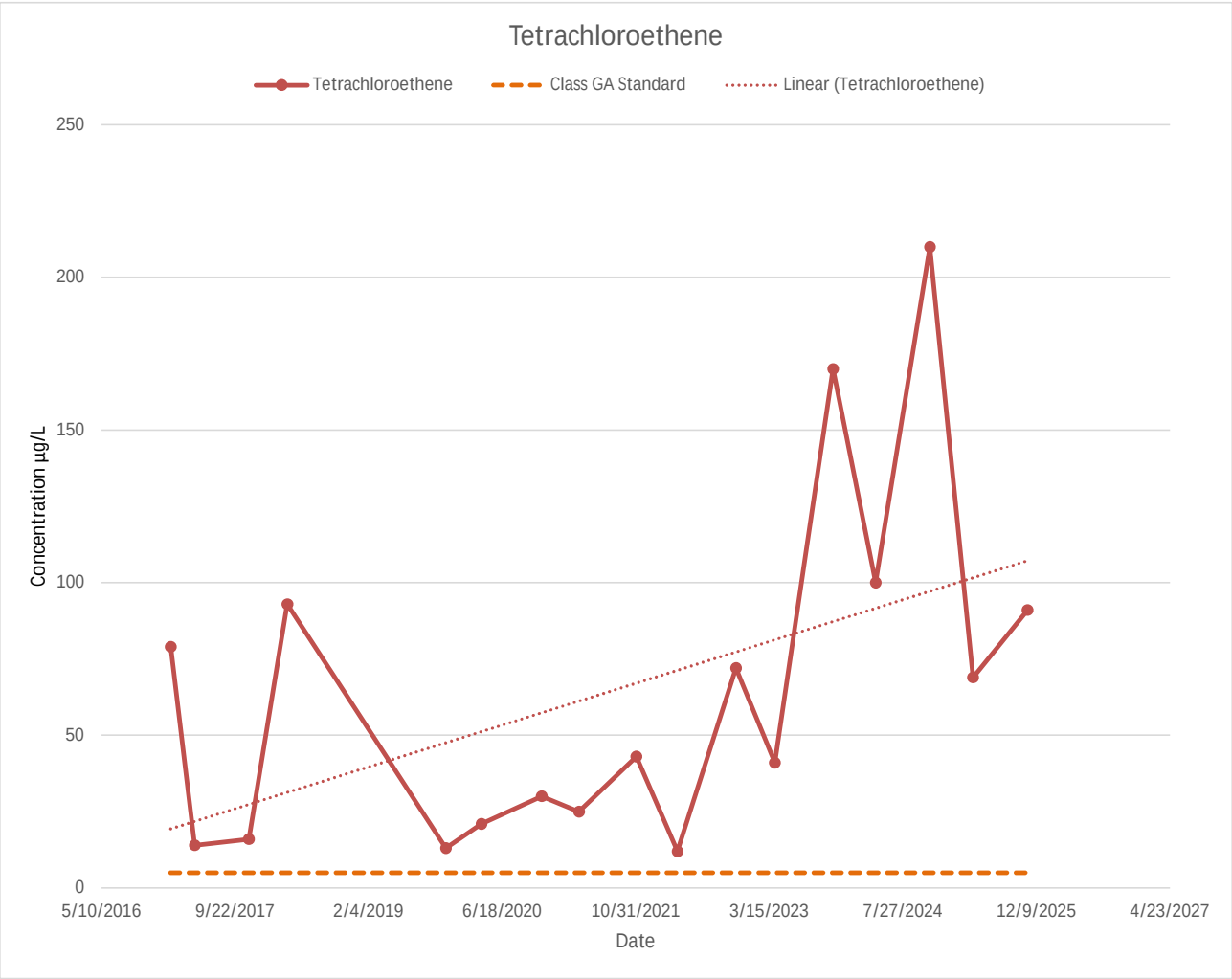
Table 9
PZ-12 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



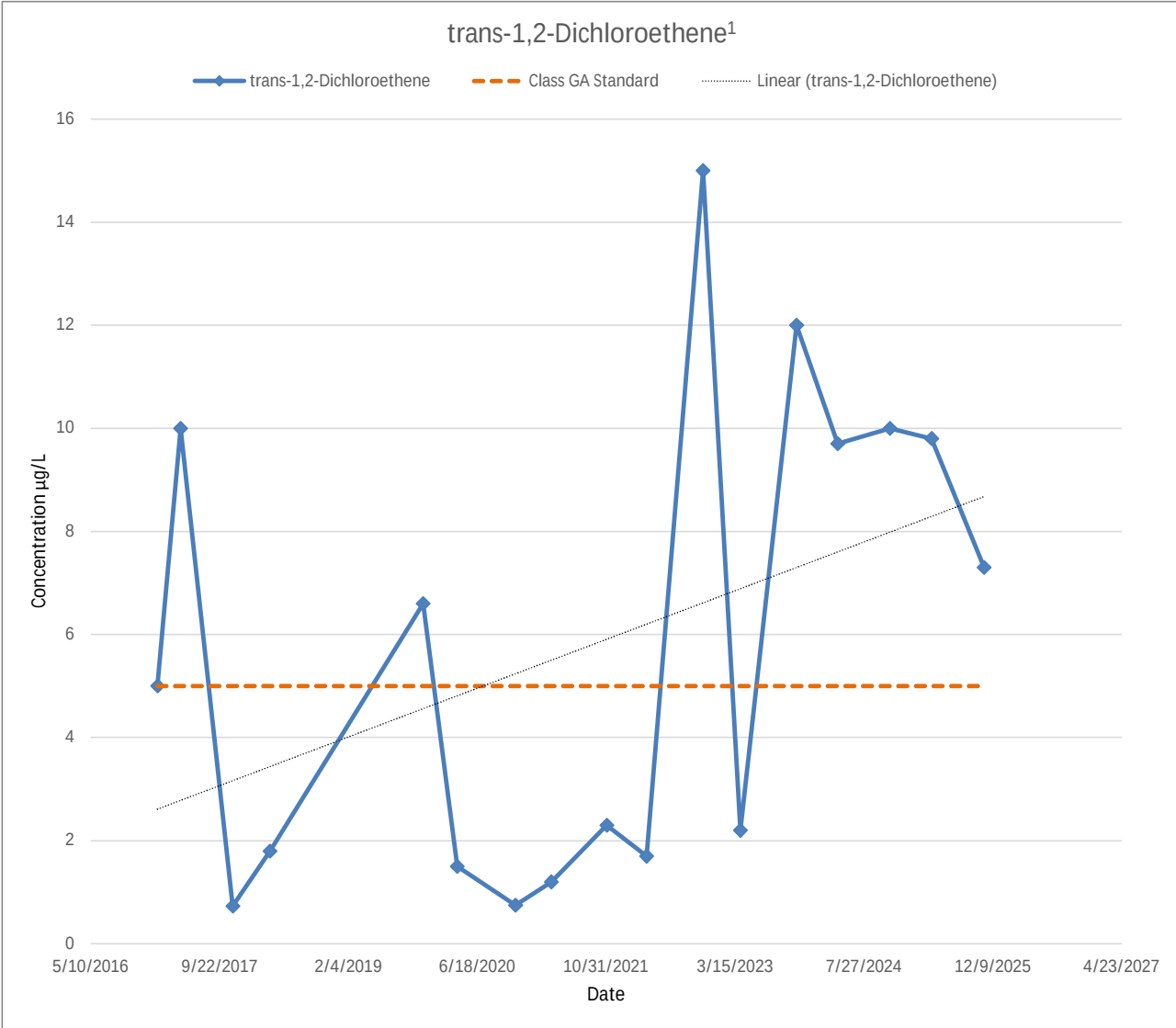
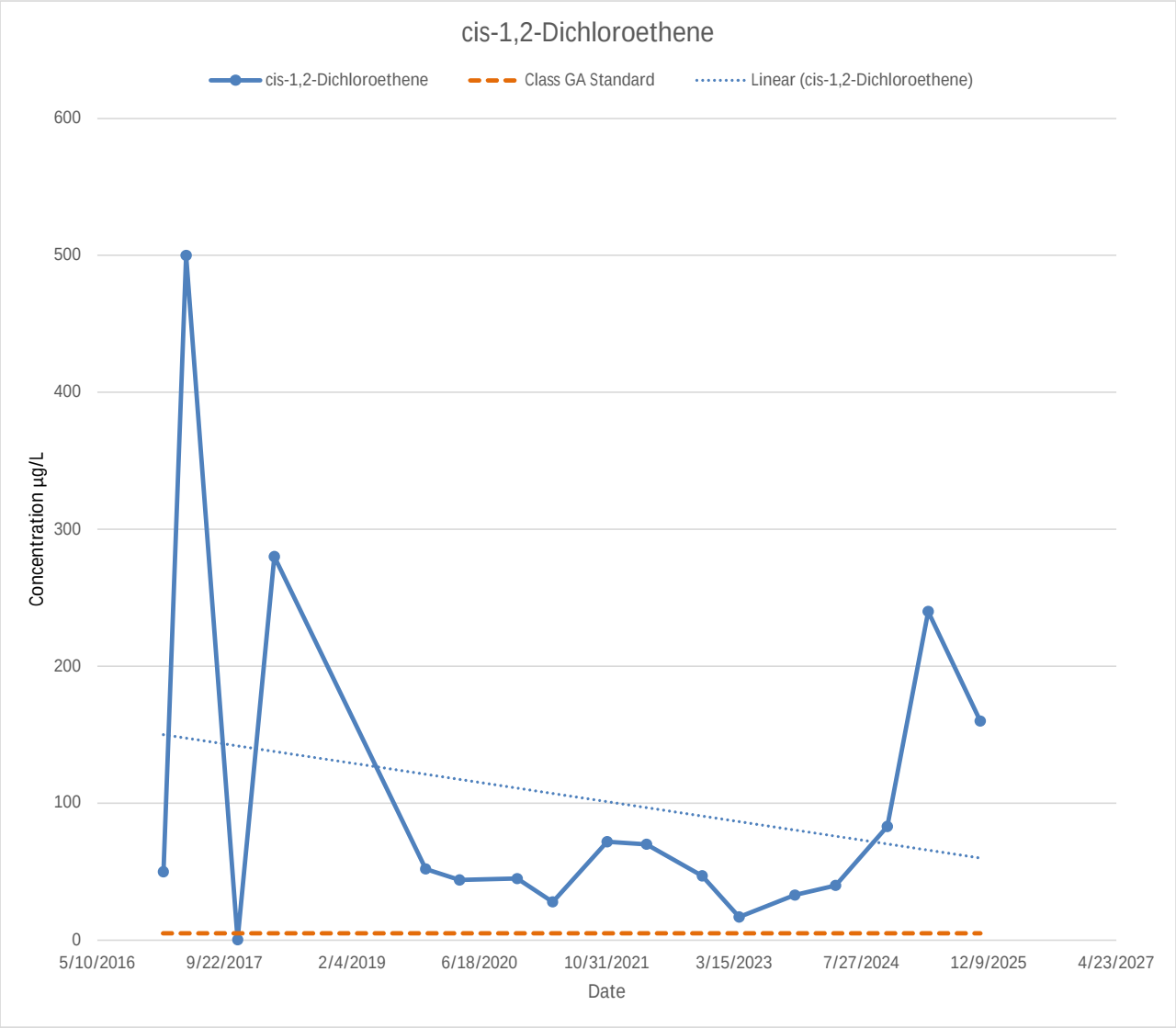
Table 10
PZ-13 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



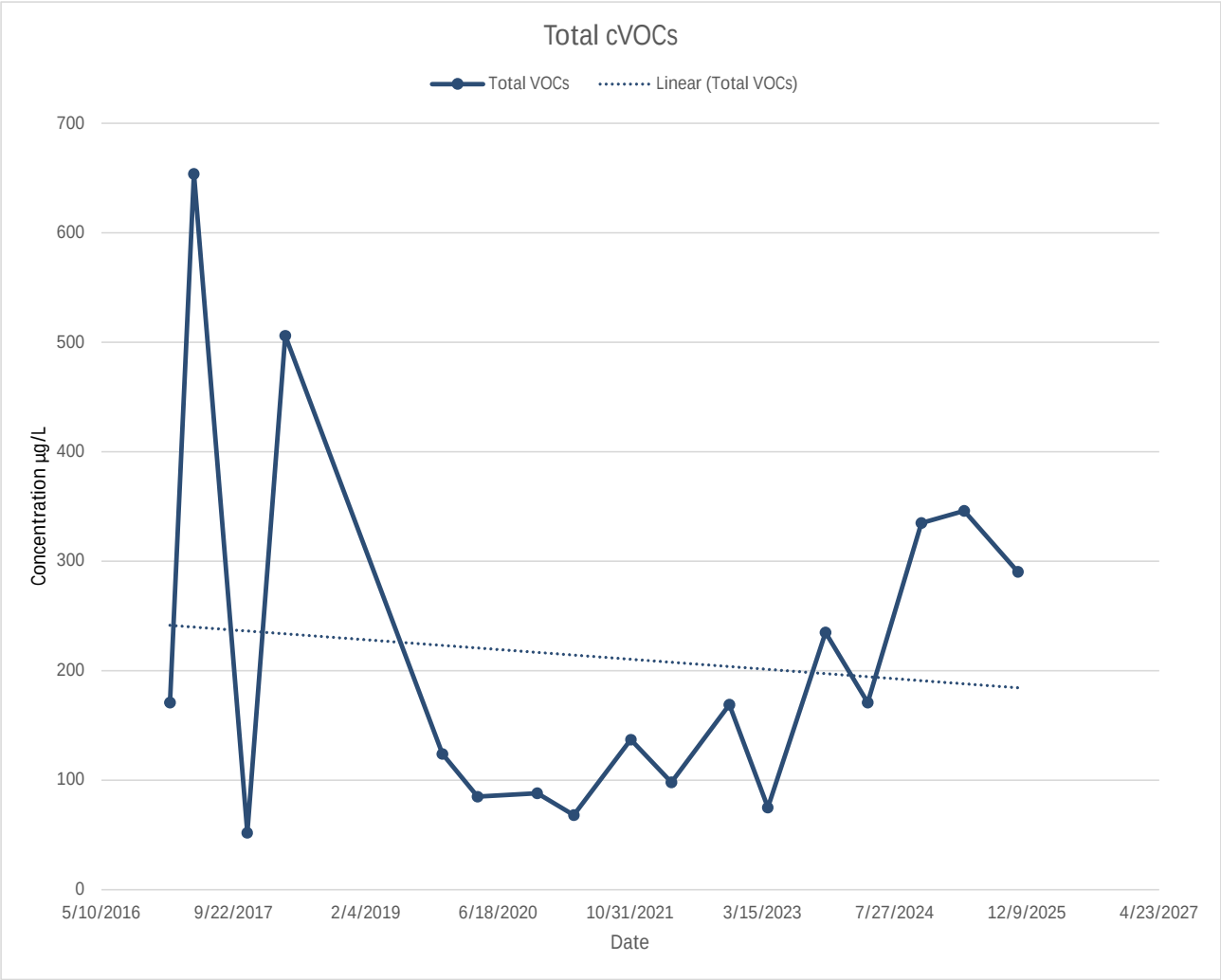
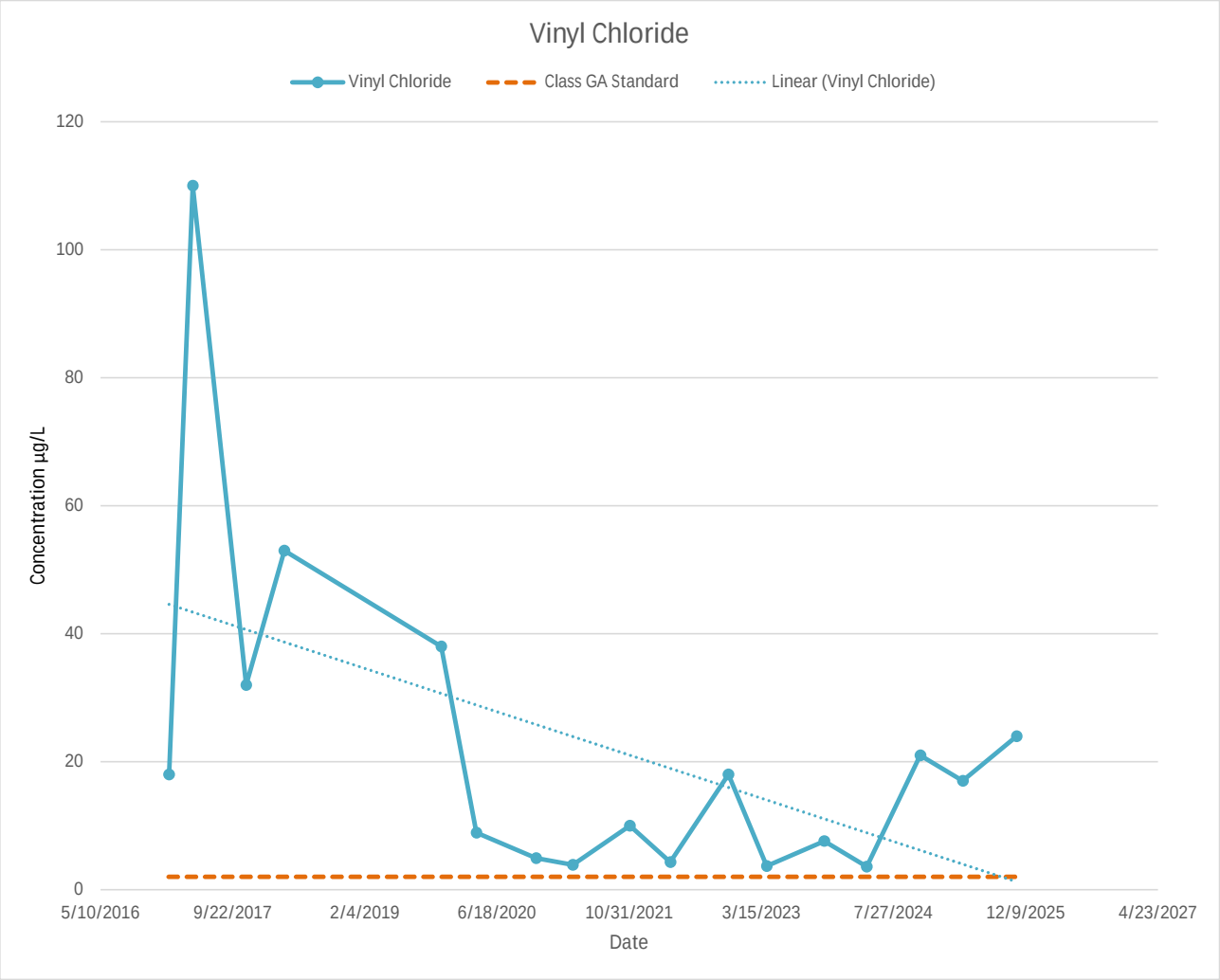
Table 10
PZ-13 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



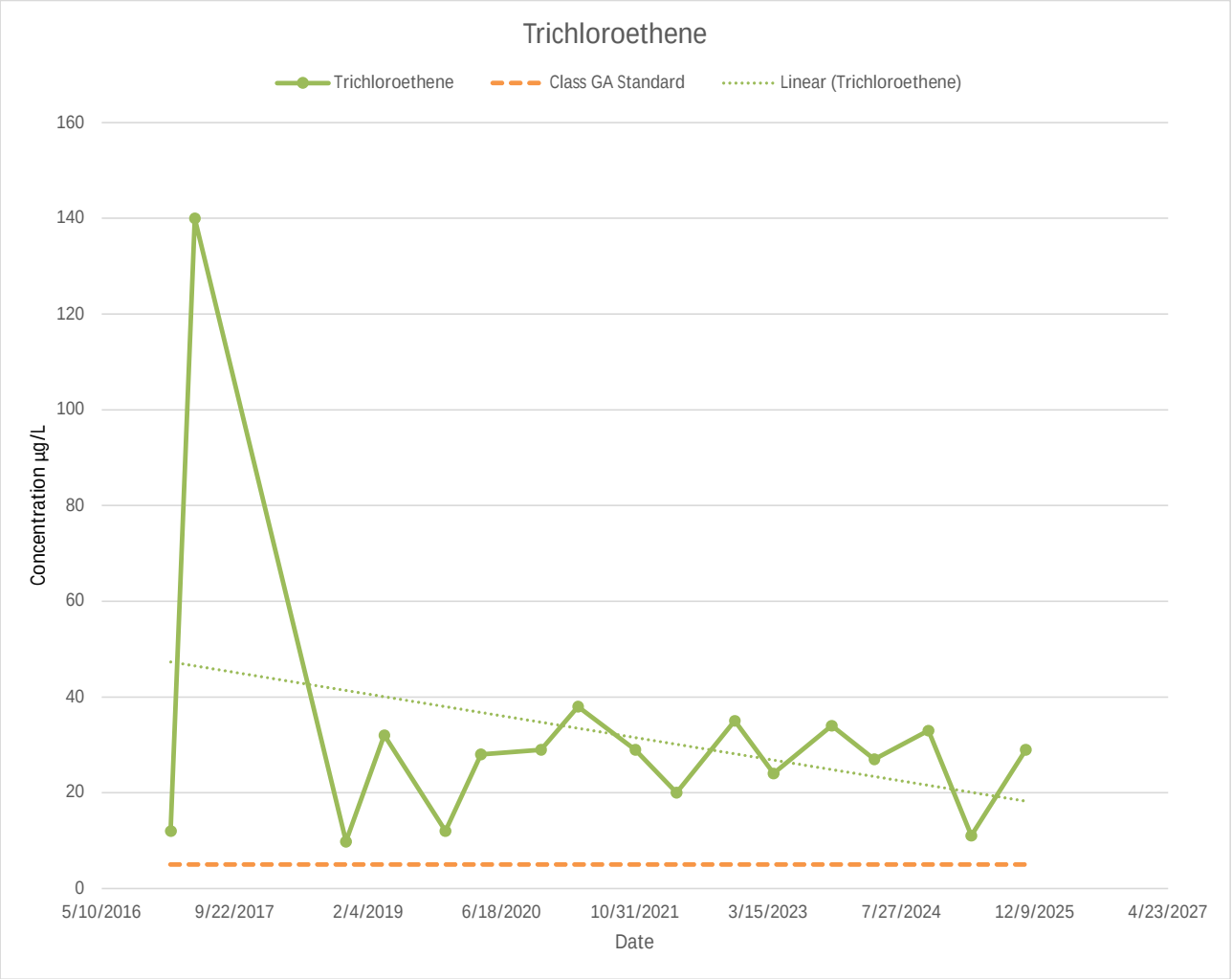
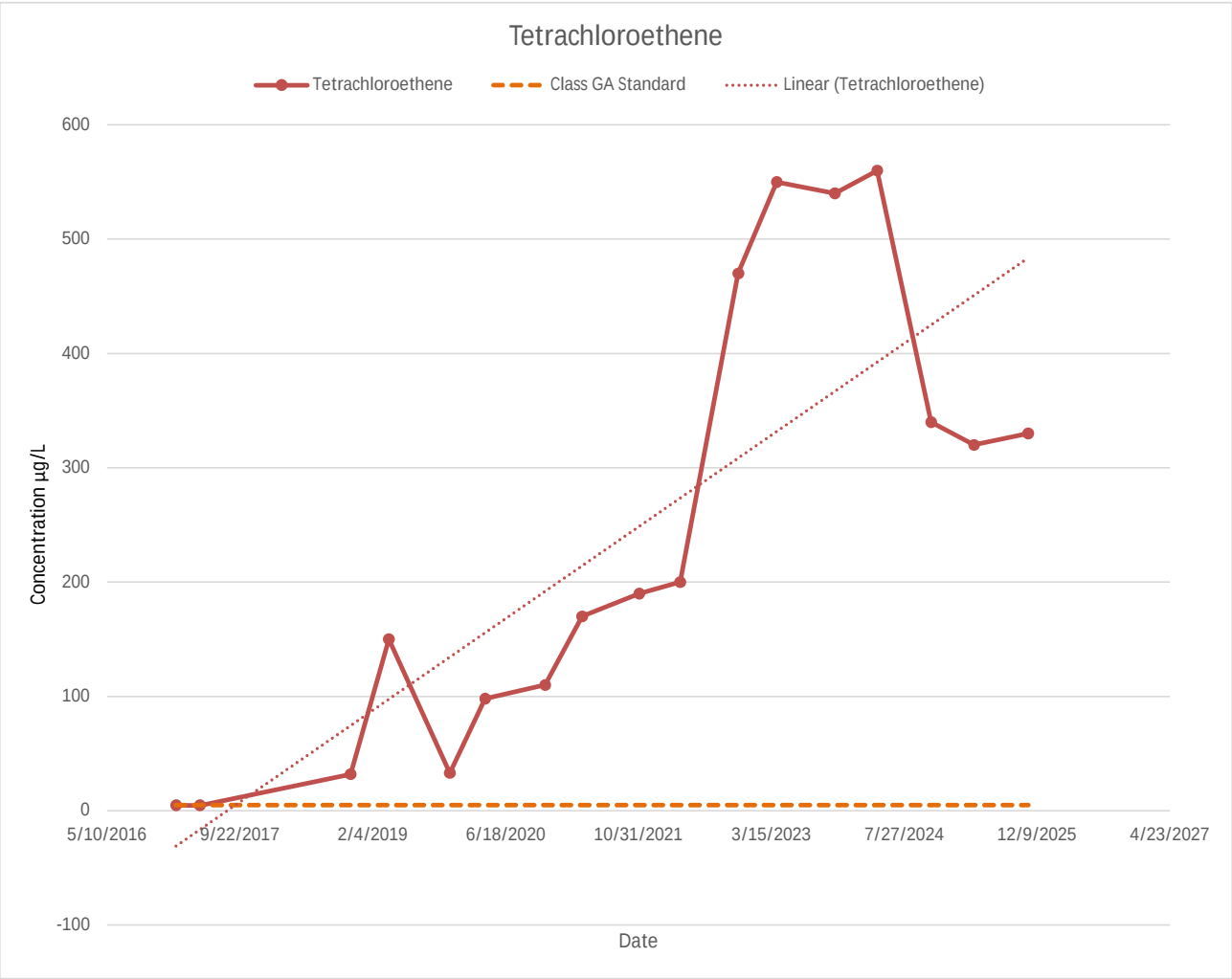
Table 10
PZ-13 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



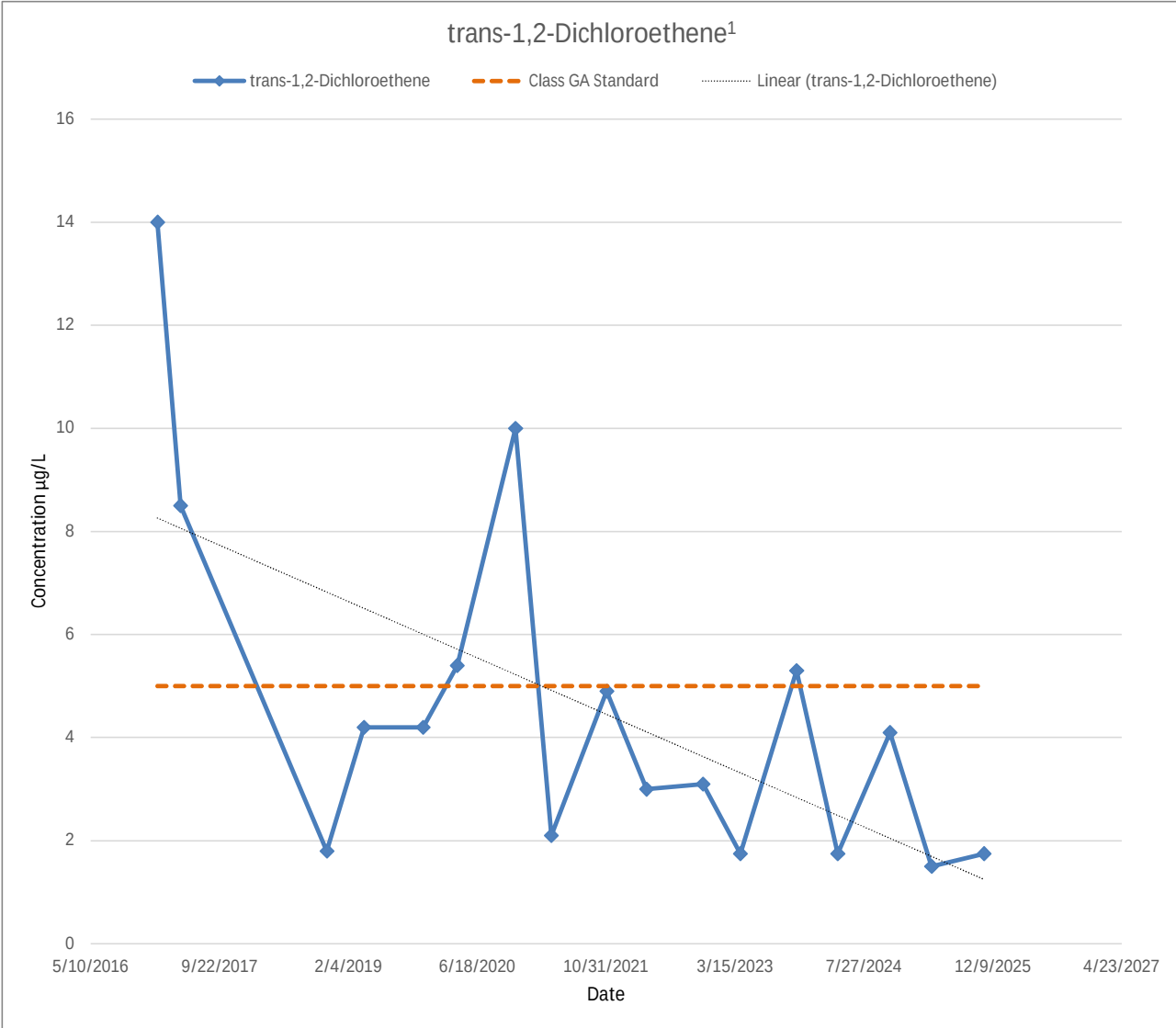
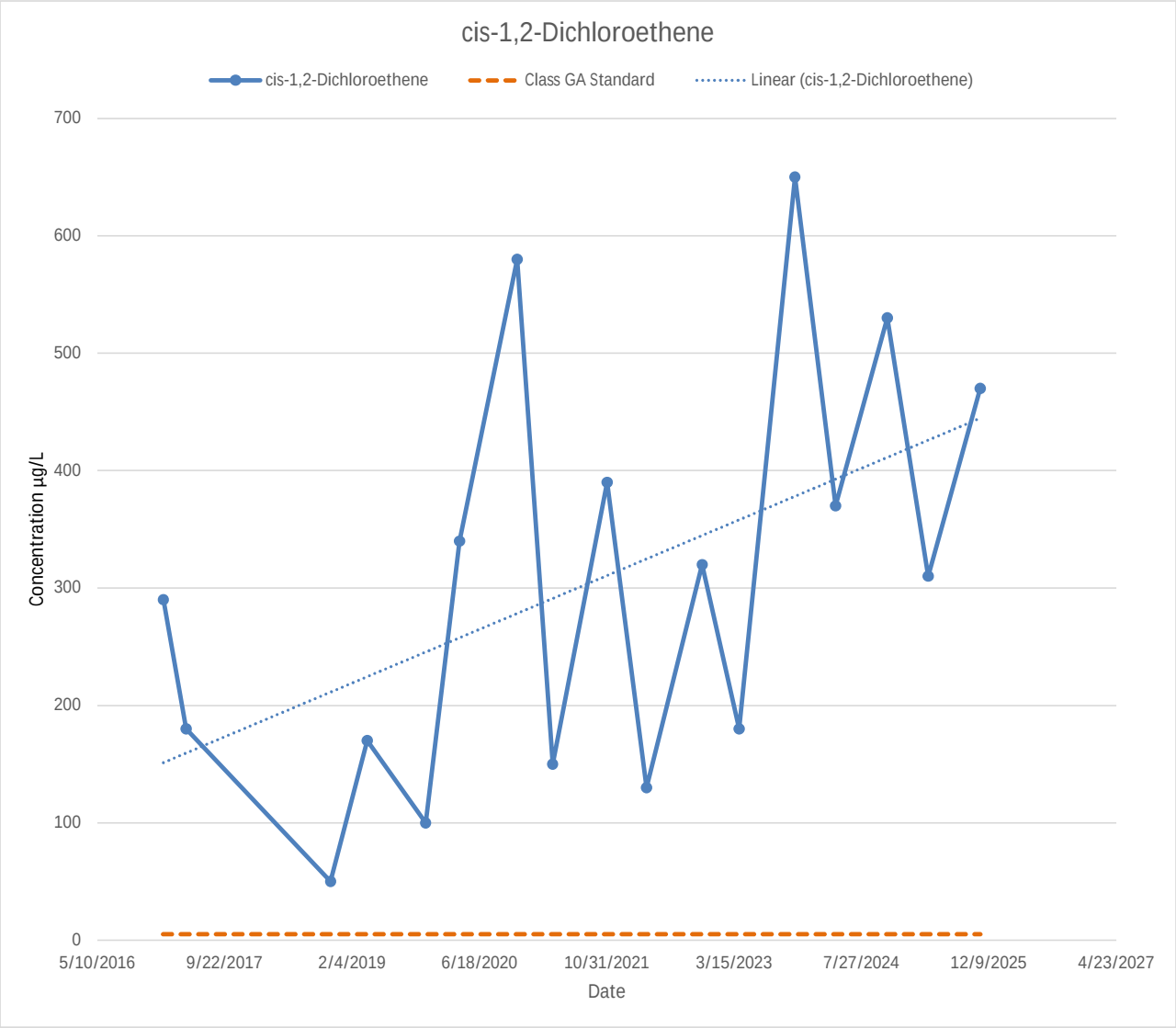
Table 11
PZ-14 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



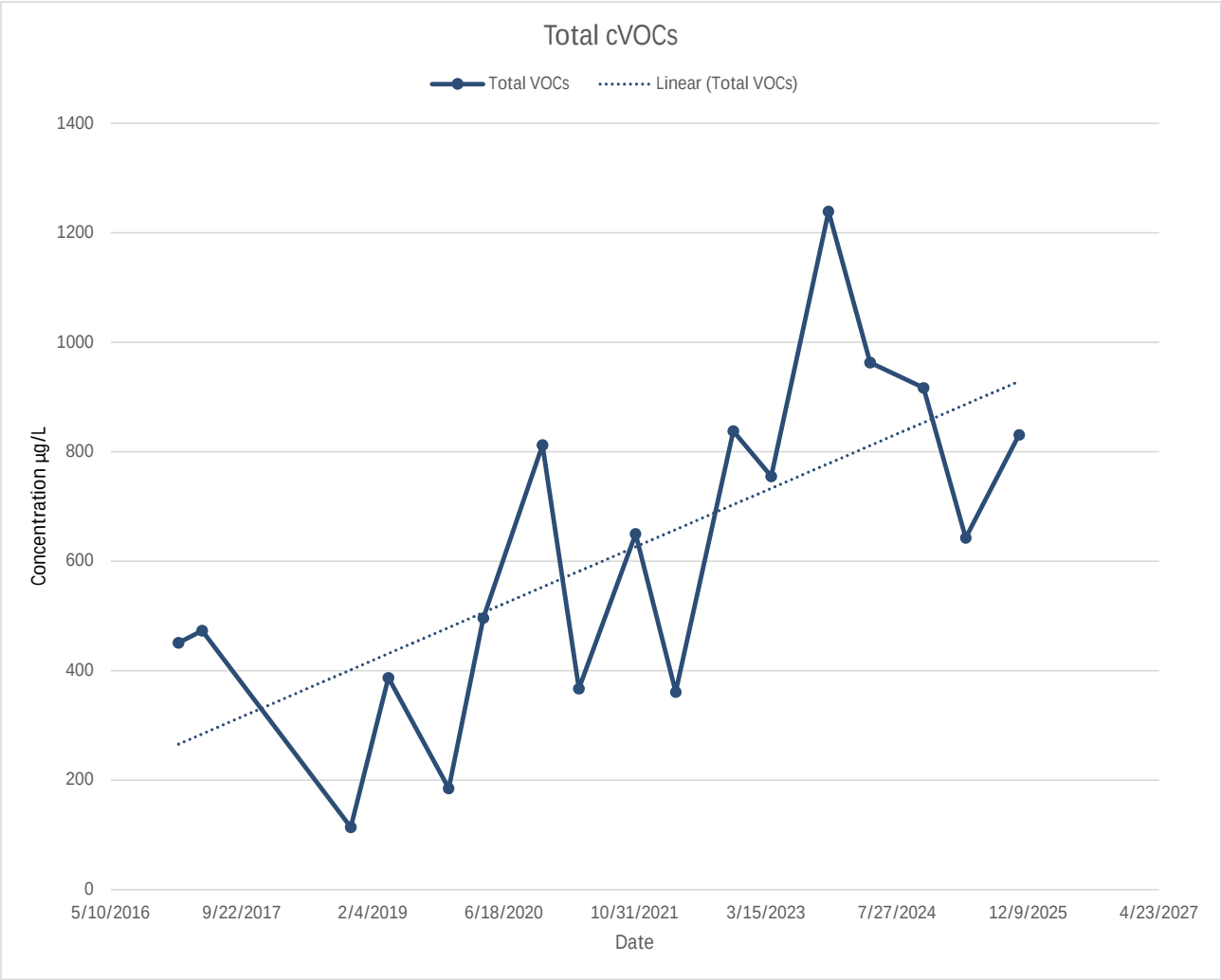
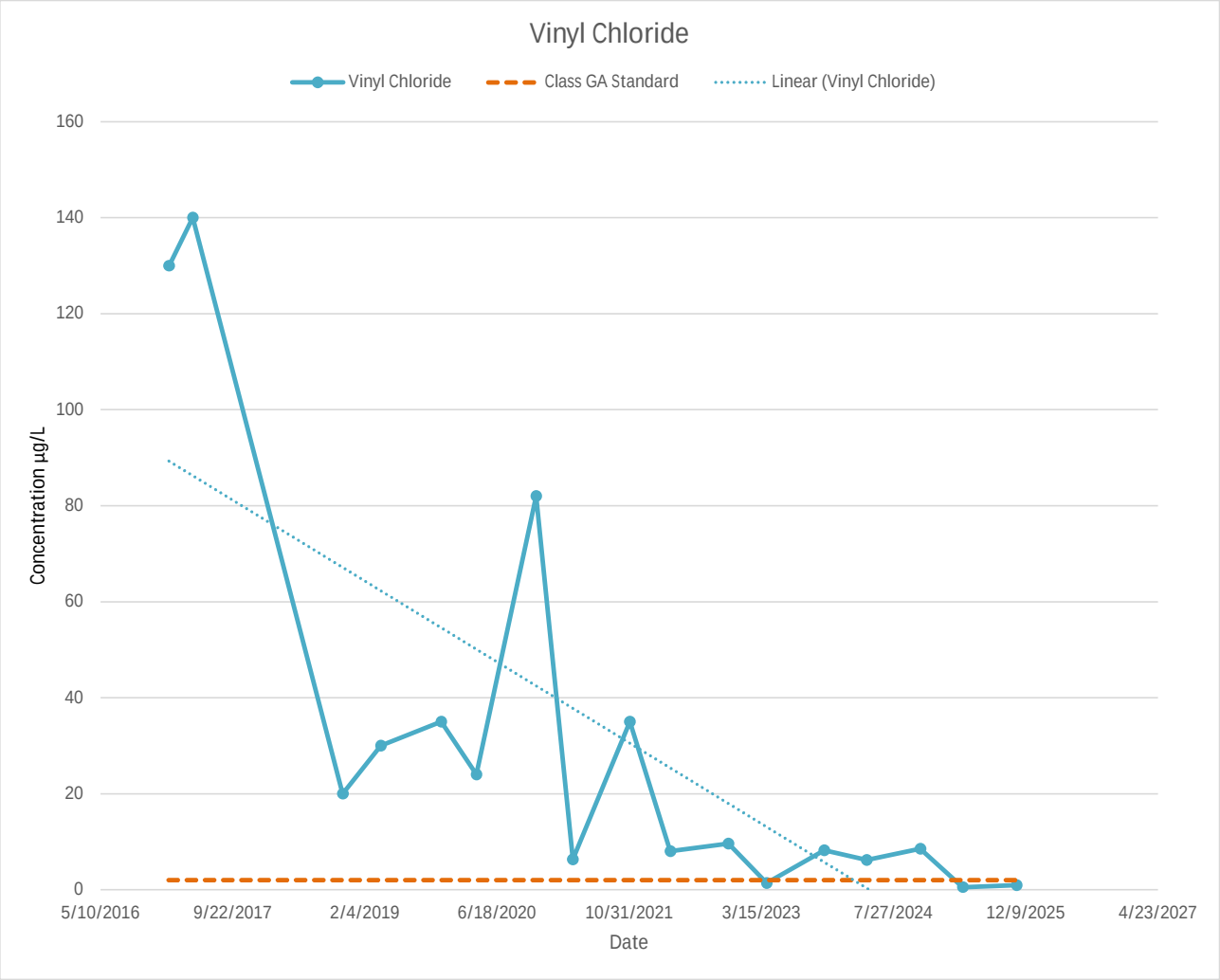
Table 11
PZ-14 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



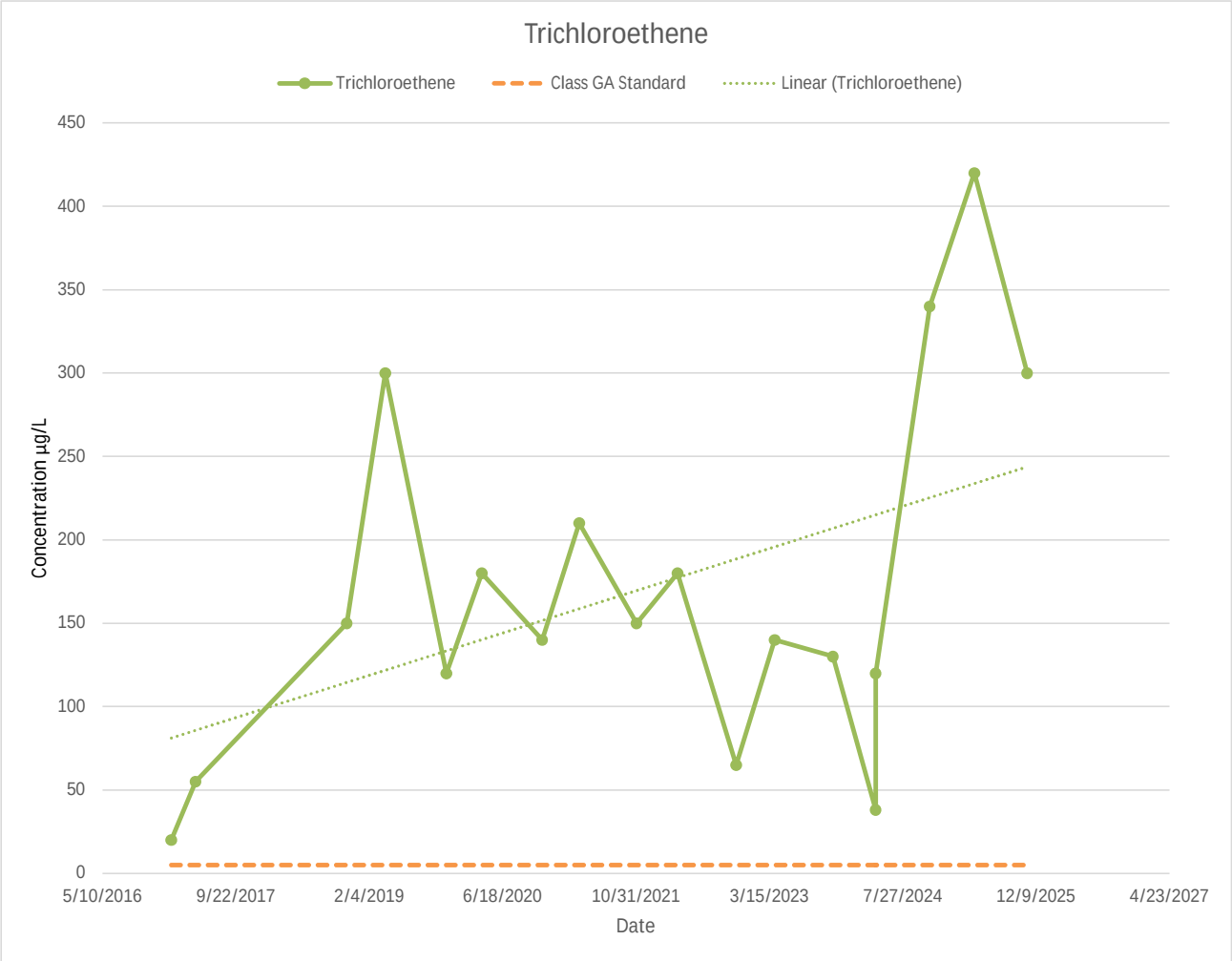
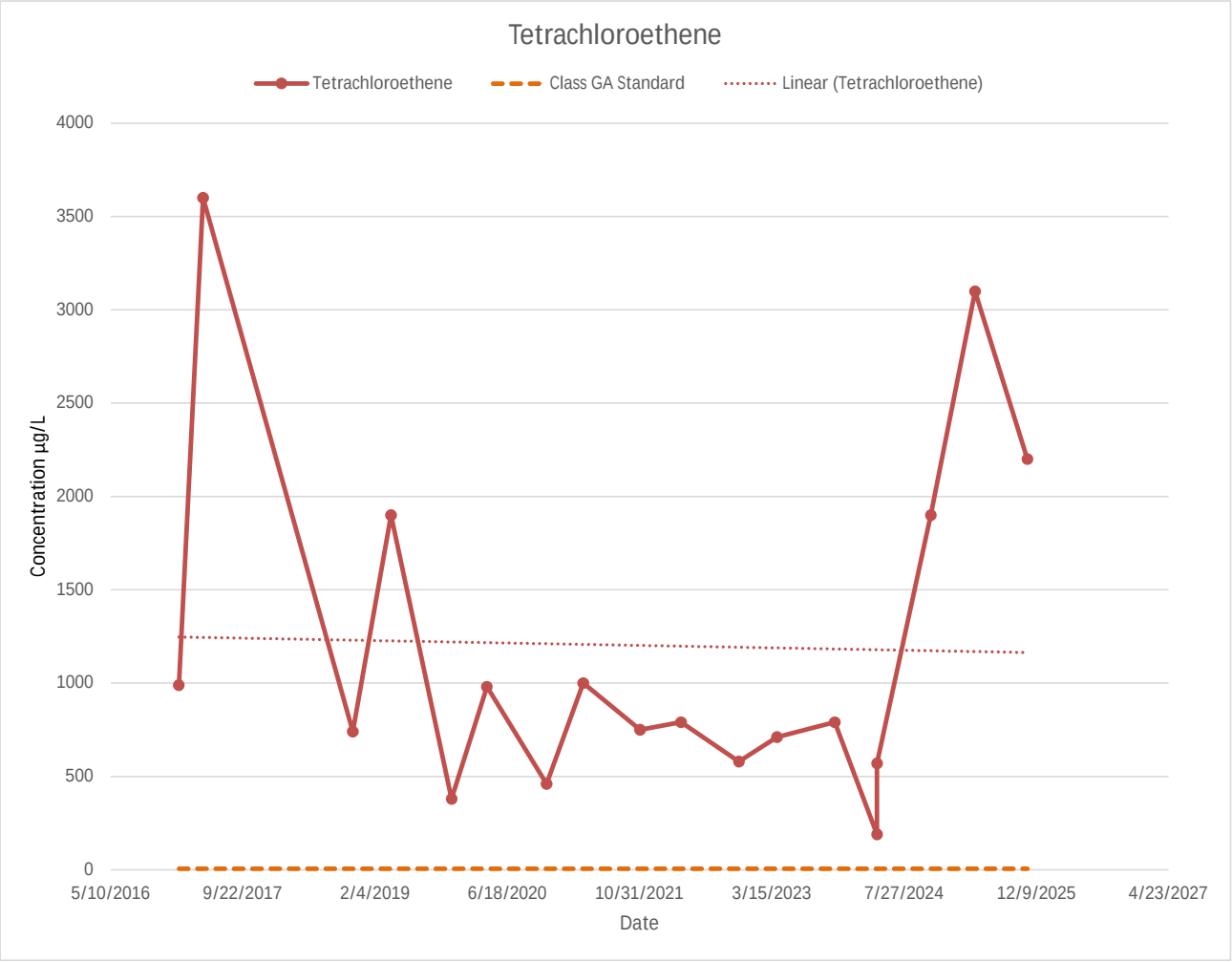
Table 11
PZ-14 Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



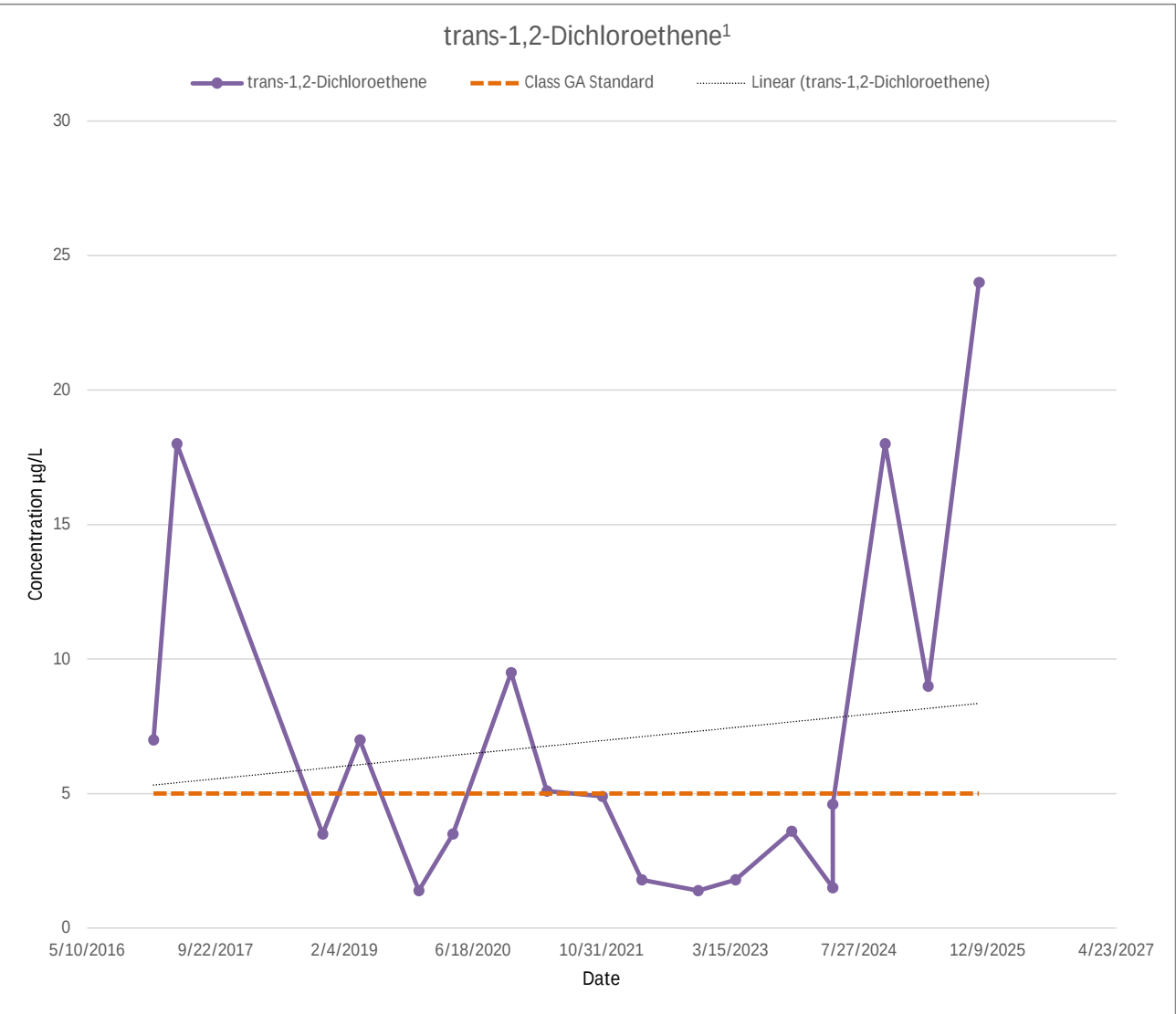
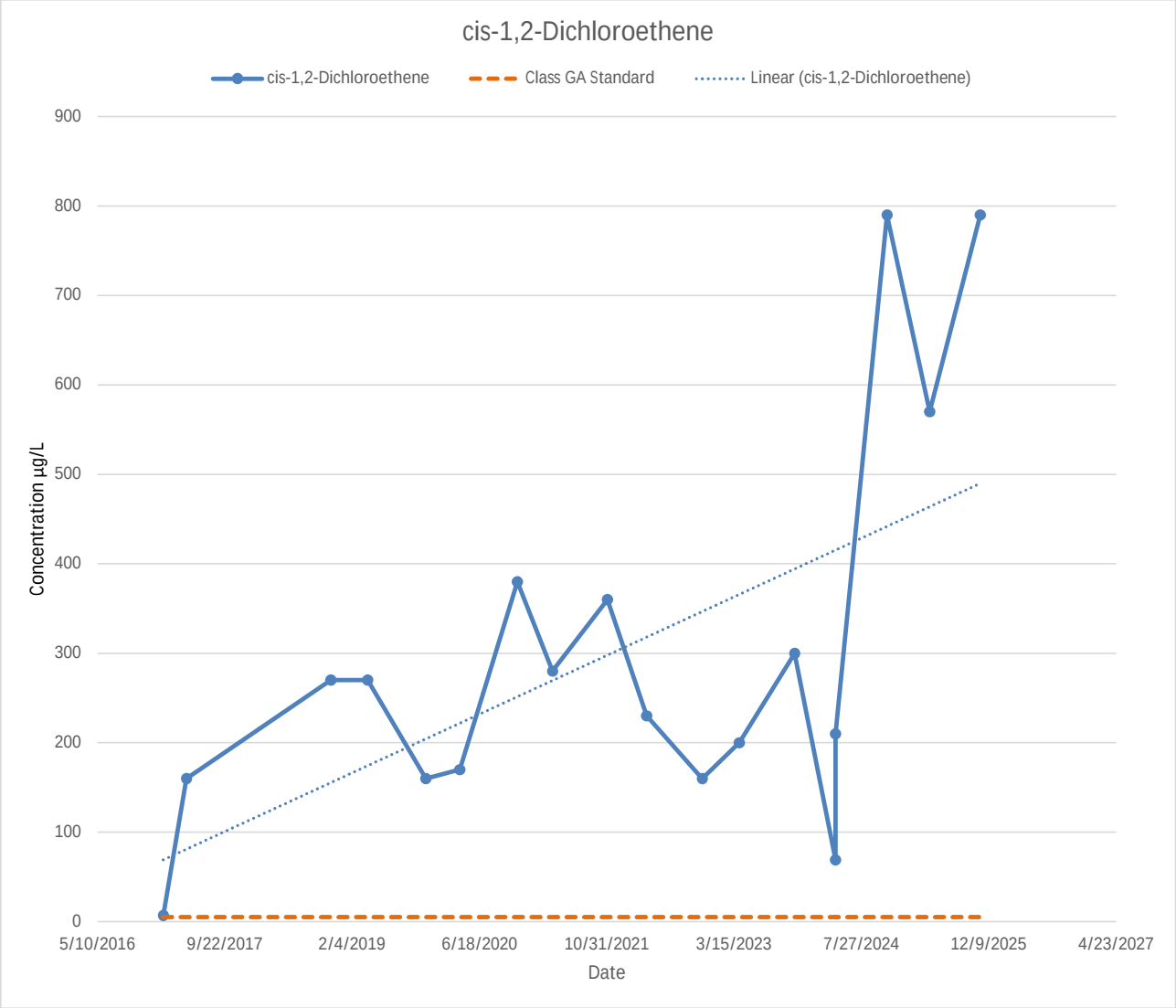
Table 12
MW-5R Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



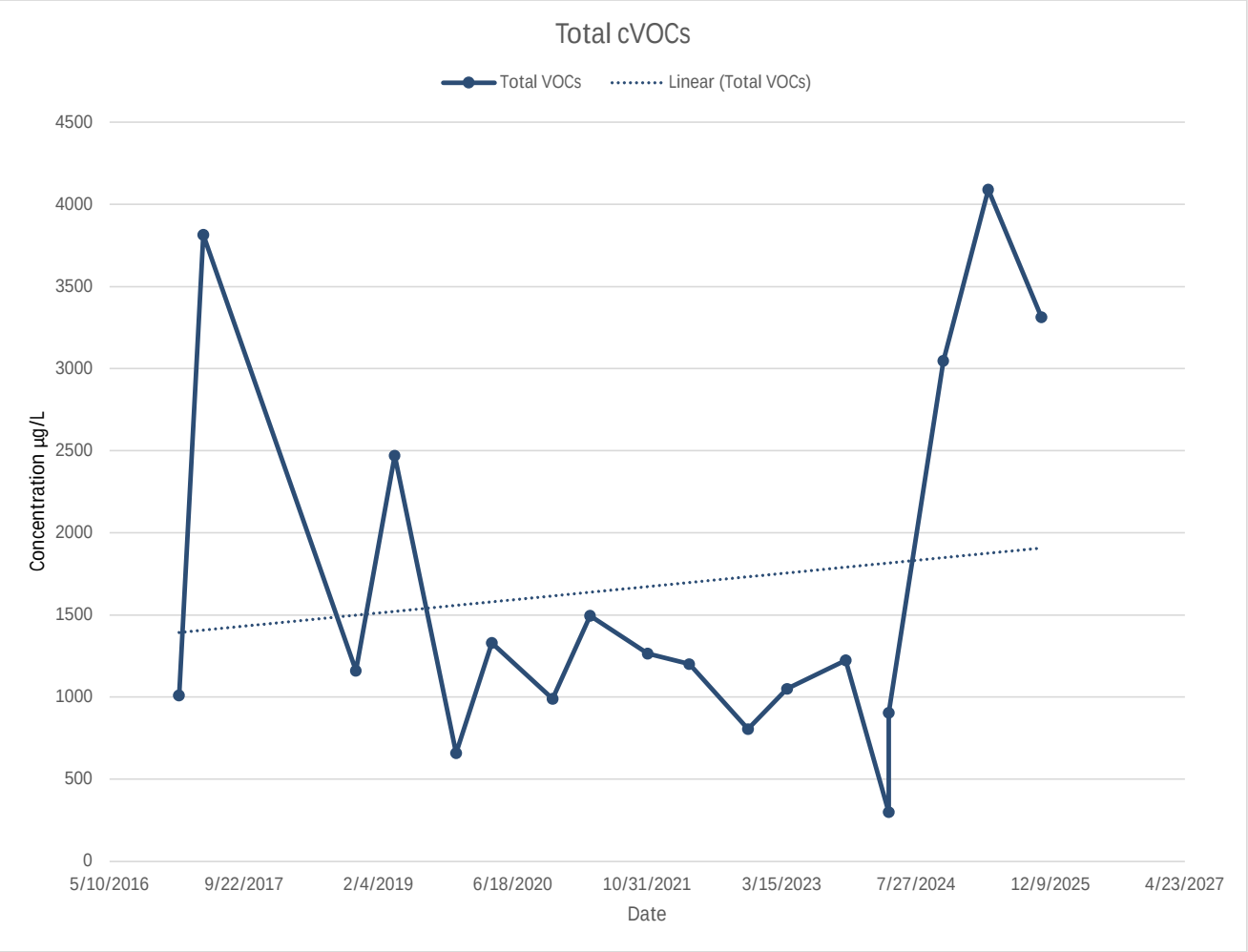
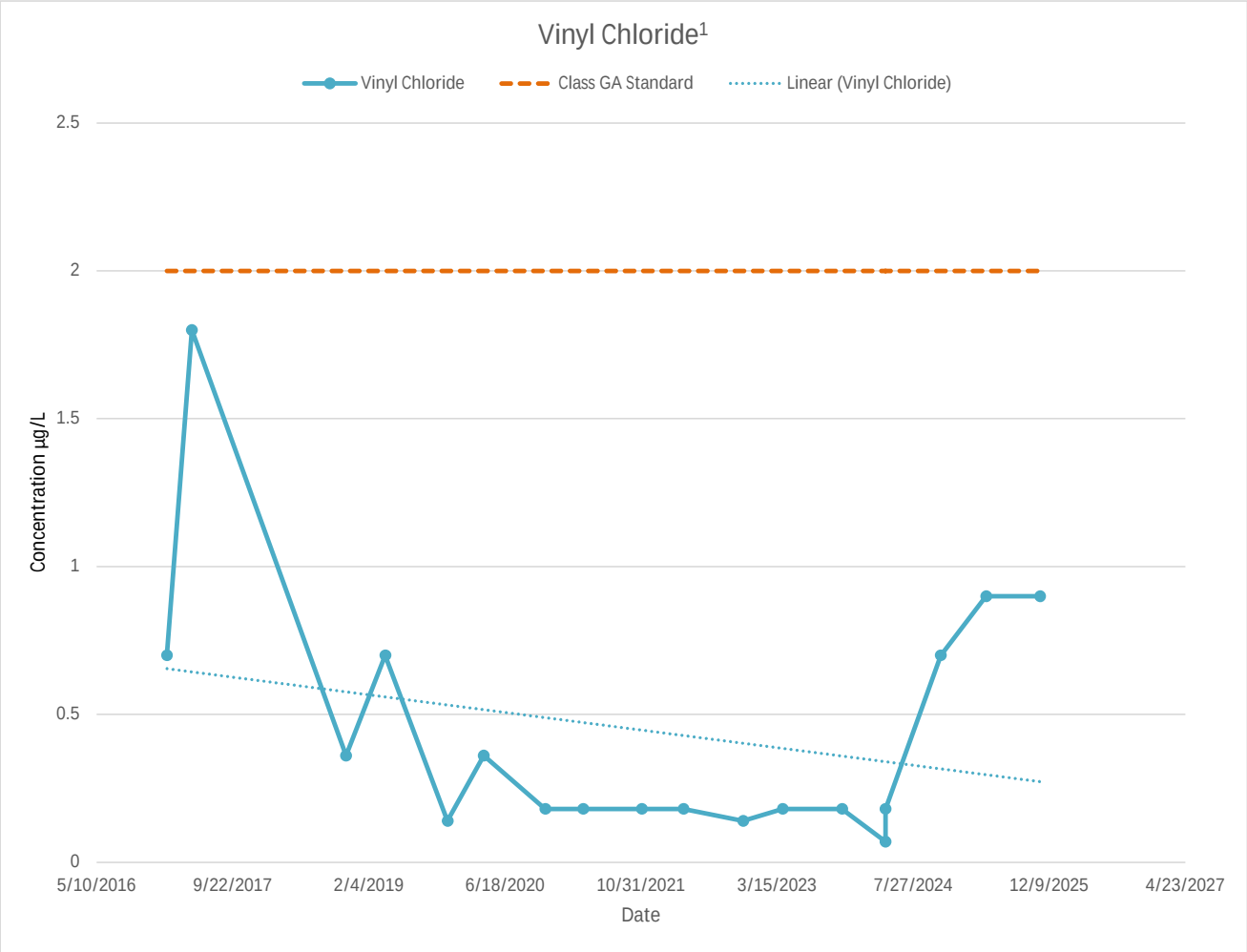
Table 12
MW-5R Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



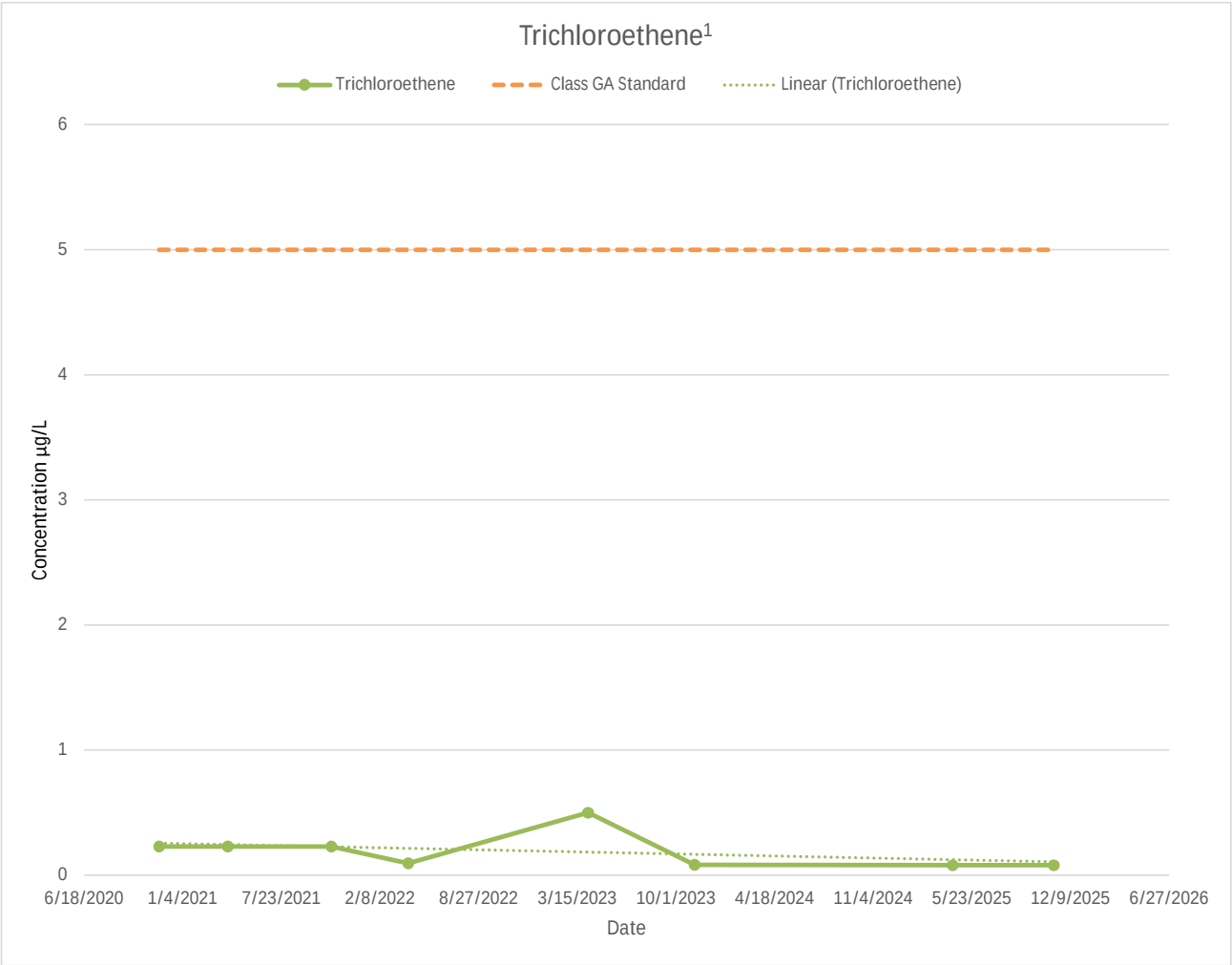
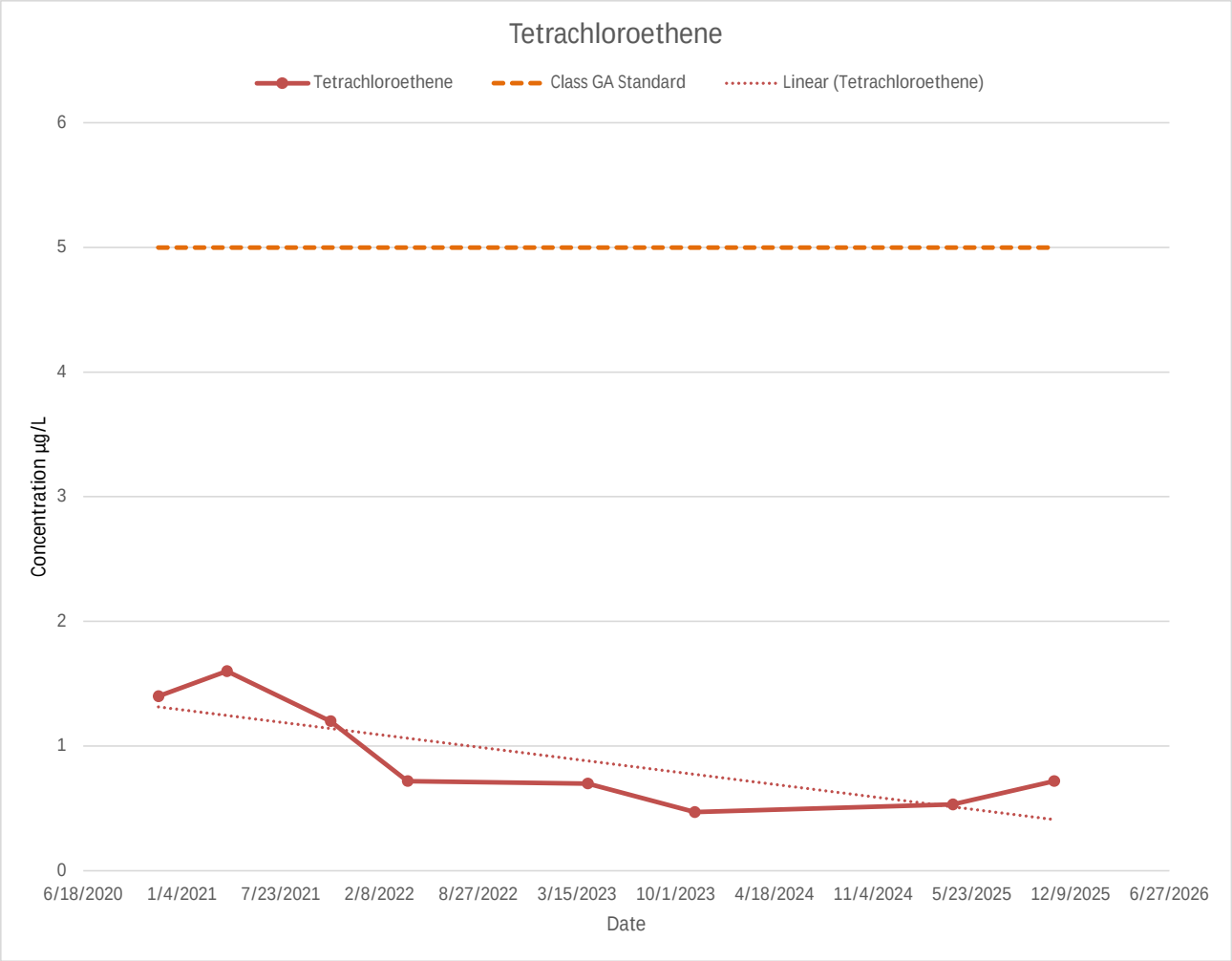
Table 12
MW-5R Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



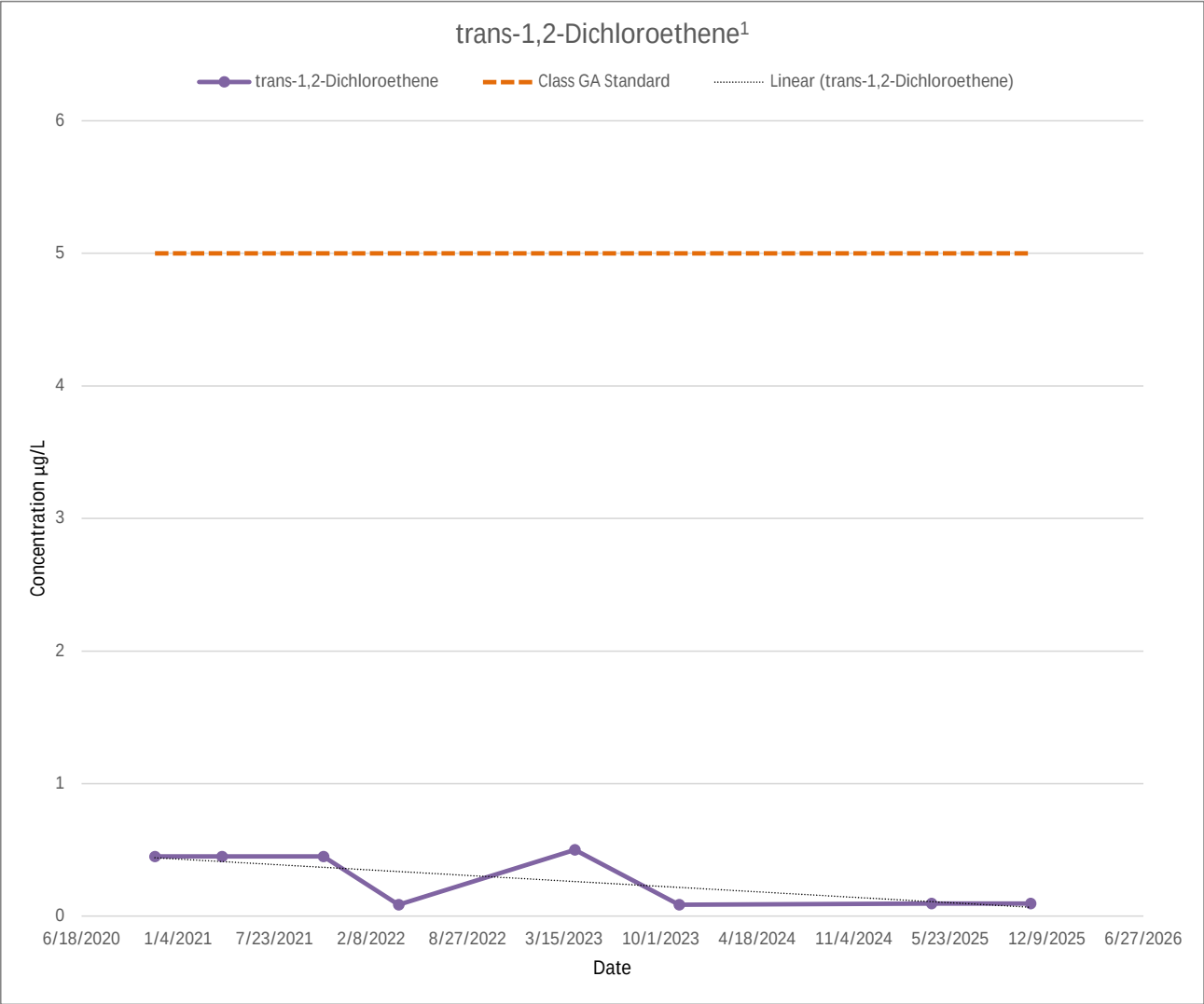
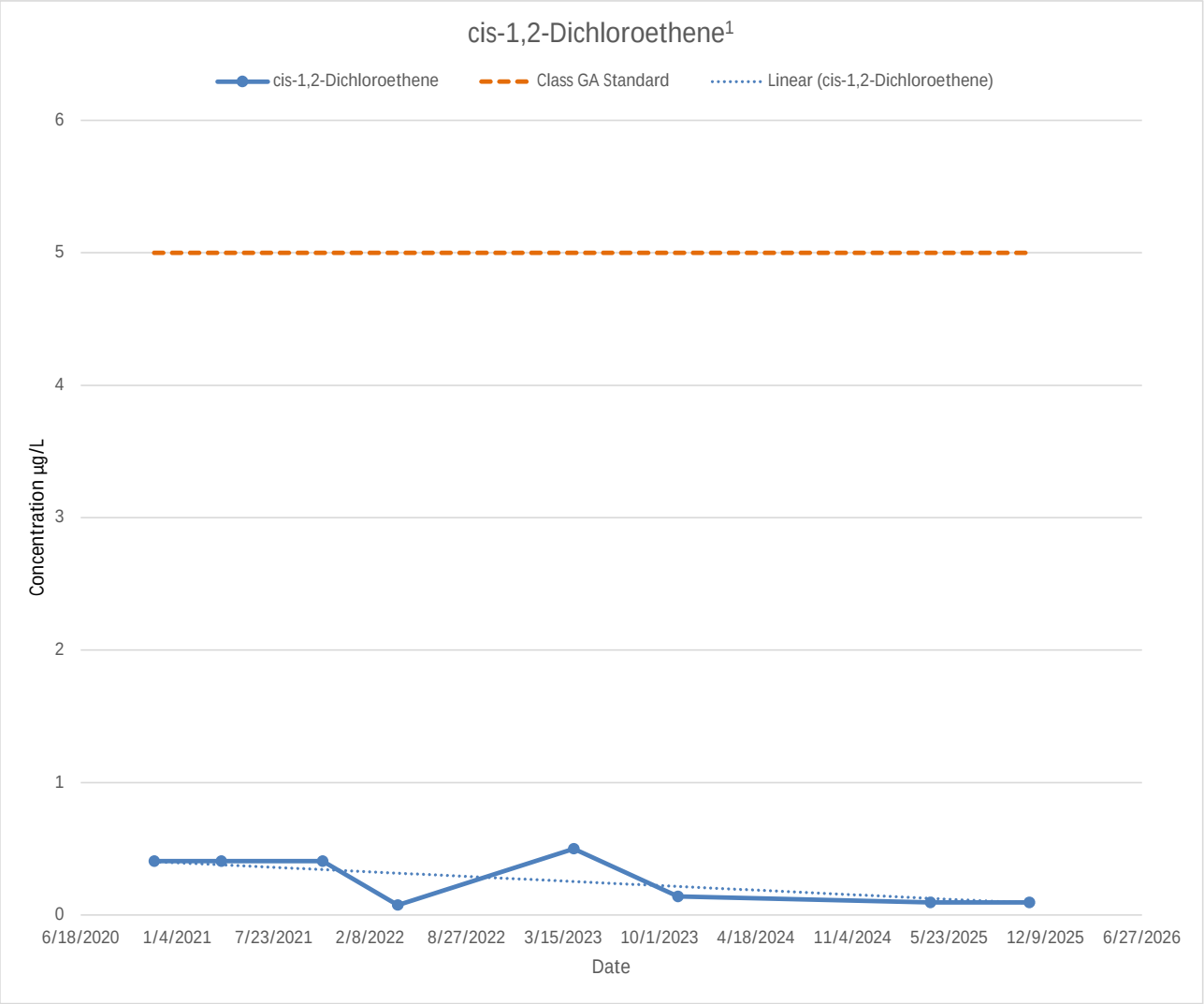
Table 13
MW-23D Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.
2: Based on the discrepancy in total depth measured and analytical data results Benchmark in consultation with the NYSDEC believe GES gauged and sampled MW-23S instead of MW-23D in sample collected on November 9, 2022.



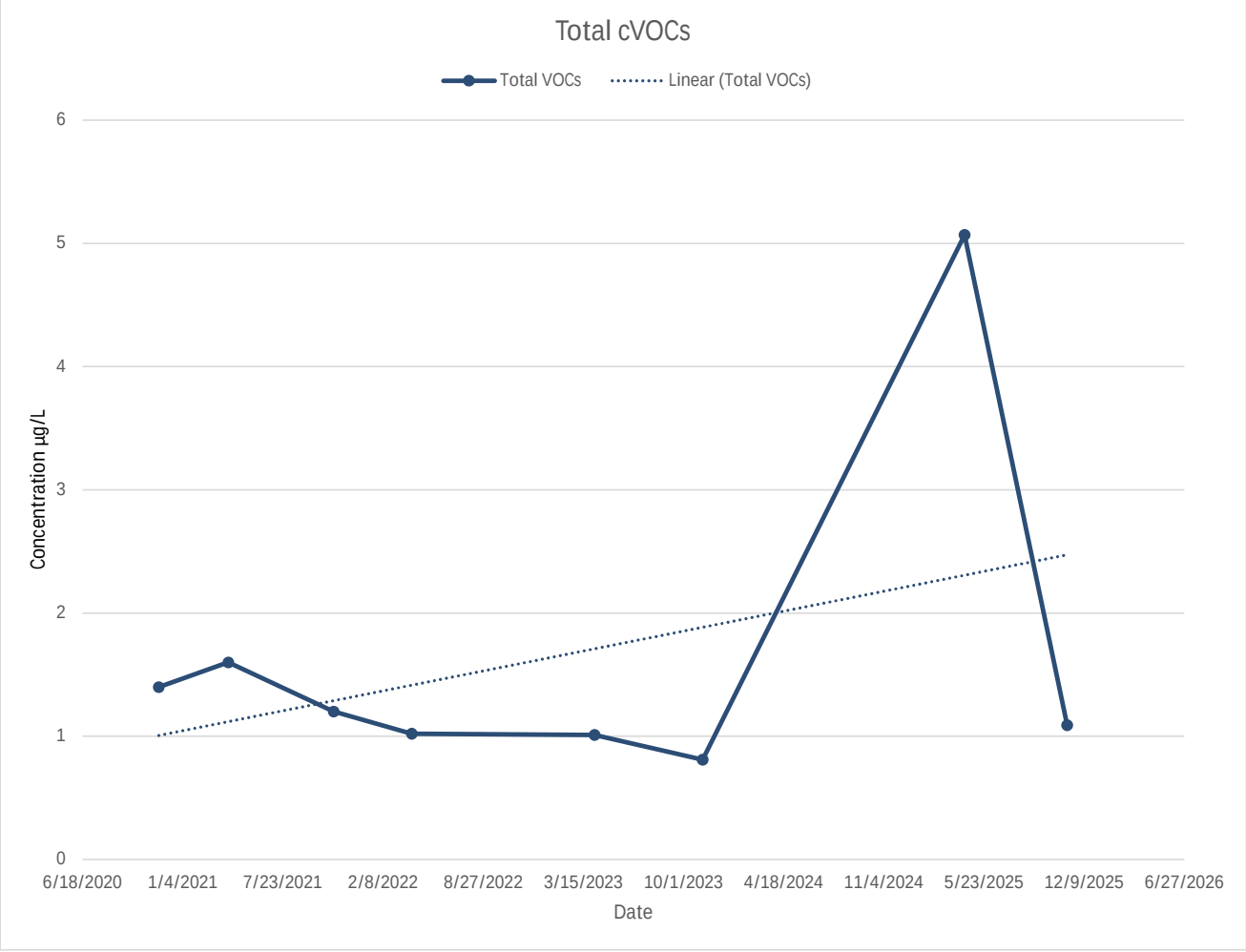
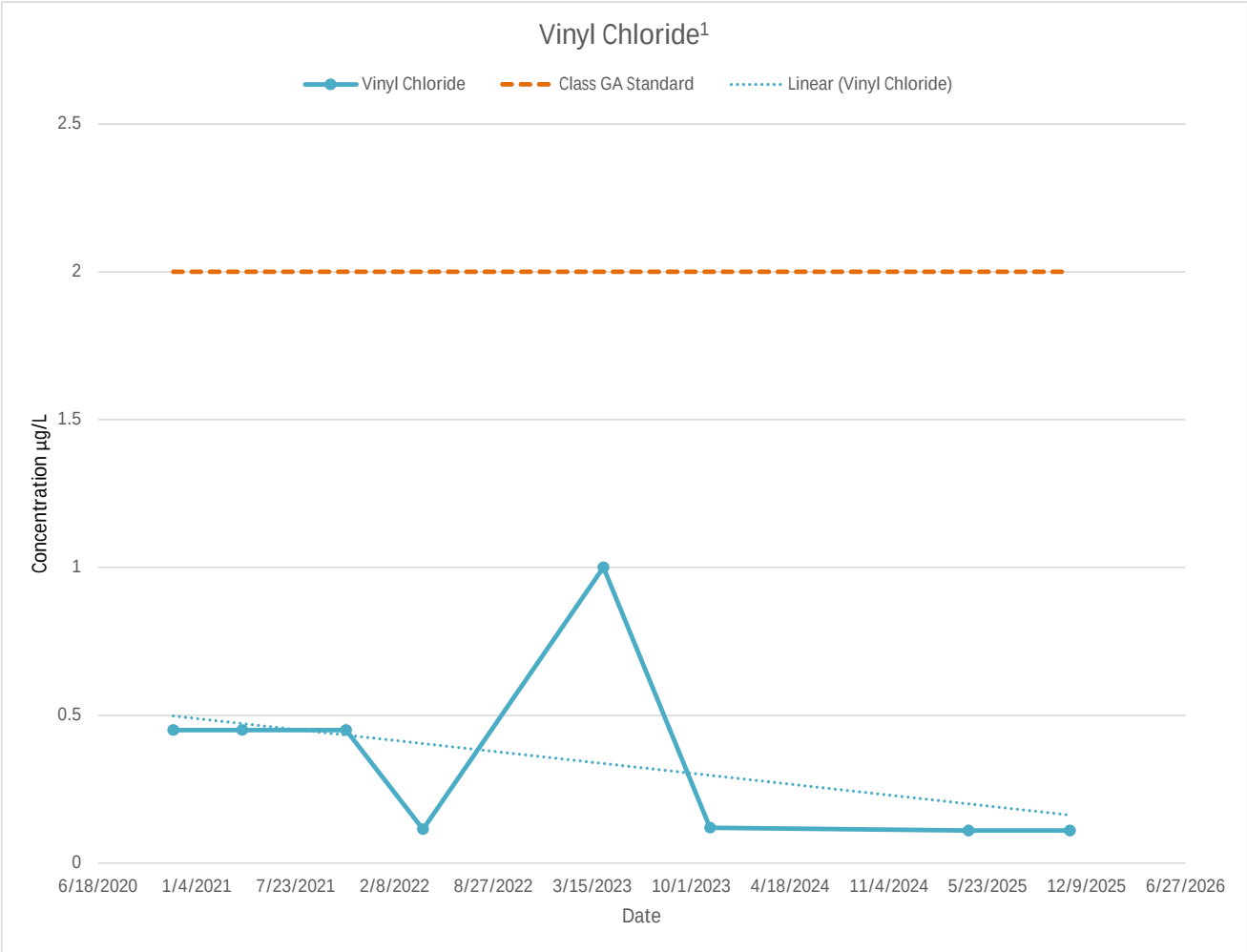
Table 13
MW-23D Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.
2: Based on the discrepancy in total depth measured and analytical data results Benchmark in consultation with the NYSDEC believe GES gauged and sampled MW-23S instead of MW-23D in sample collected on November 9, 2022.



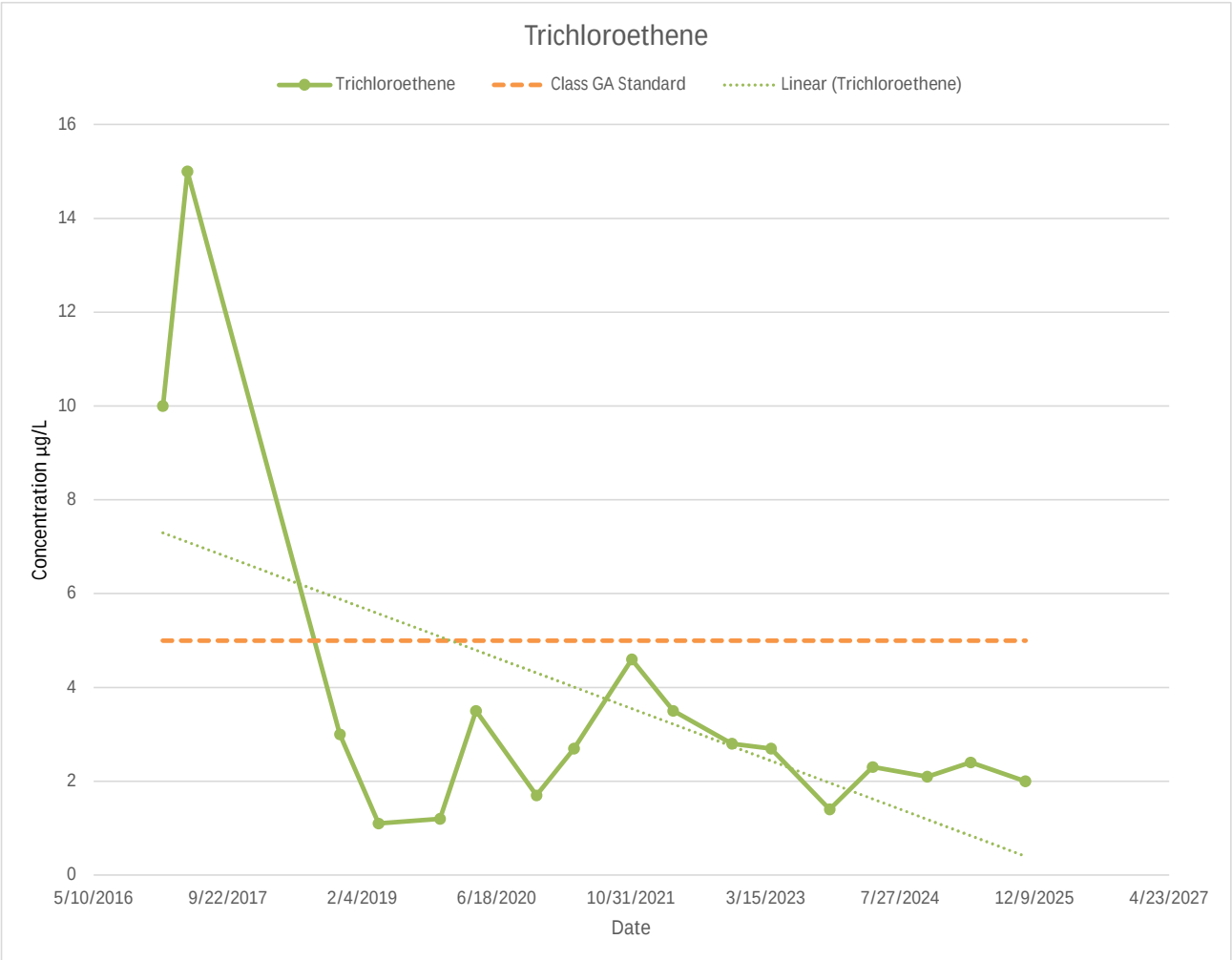
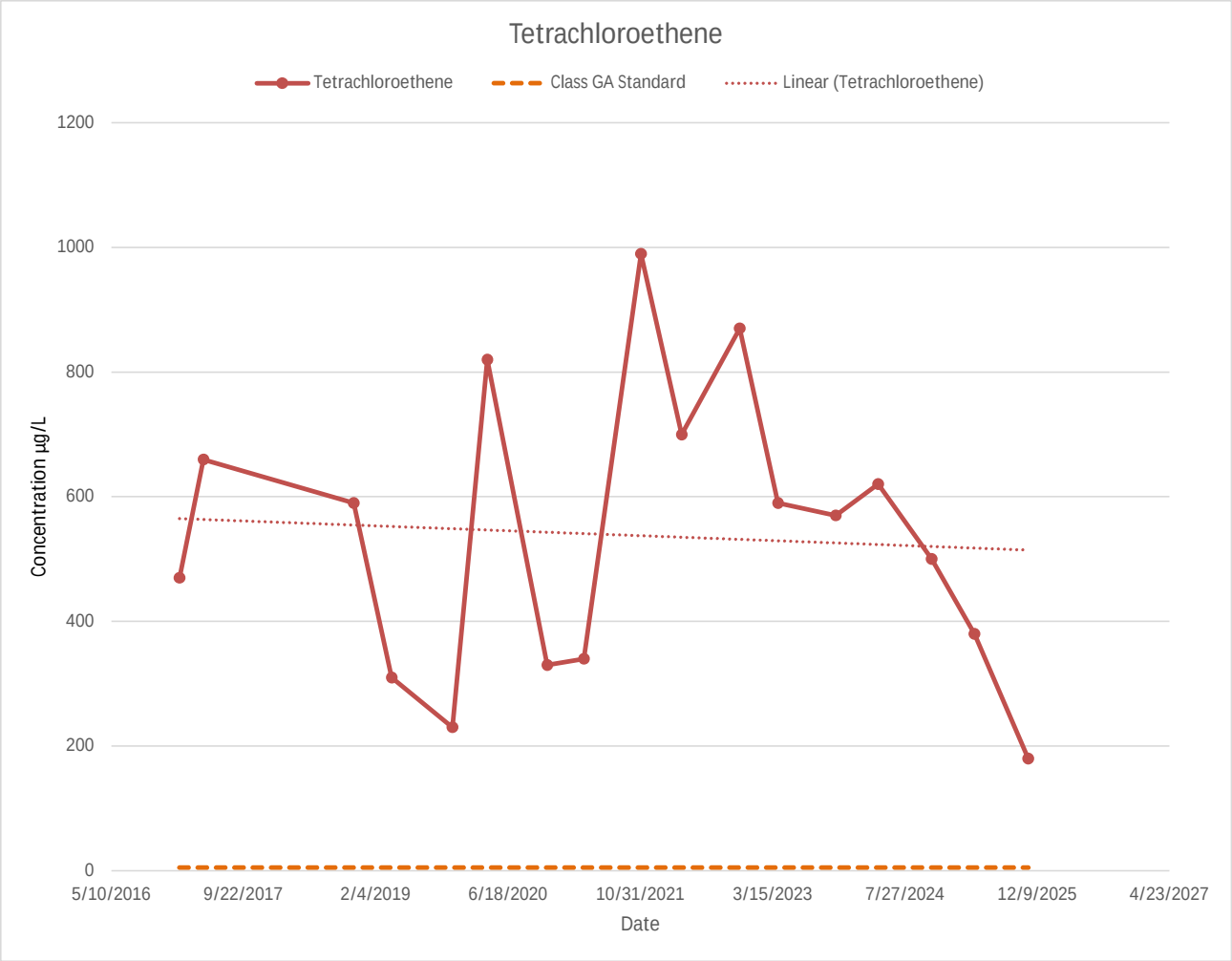
Table 13
MW-23D Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.
2: Based on the discrepancy in total depth measured and analytical data results Benchmark in consultation with the NYSDEC believe GES gauged and sampled MW-23S instead of MW-23D in sample collected on November 9, 2022.



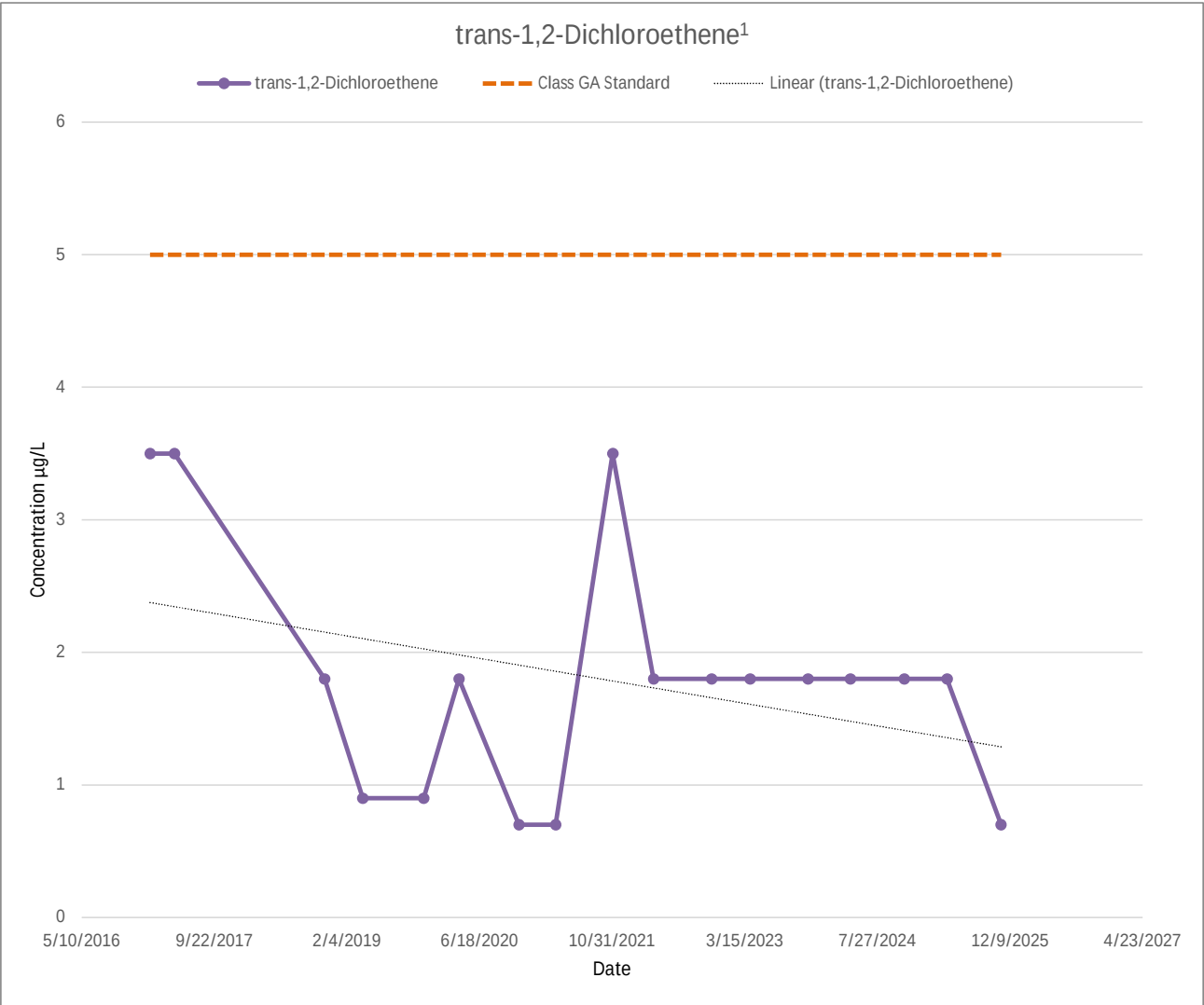
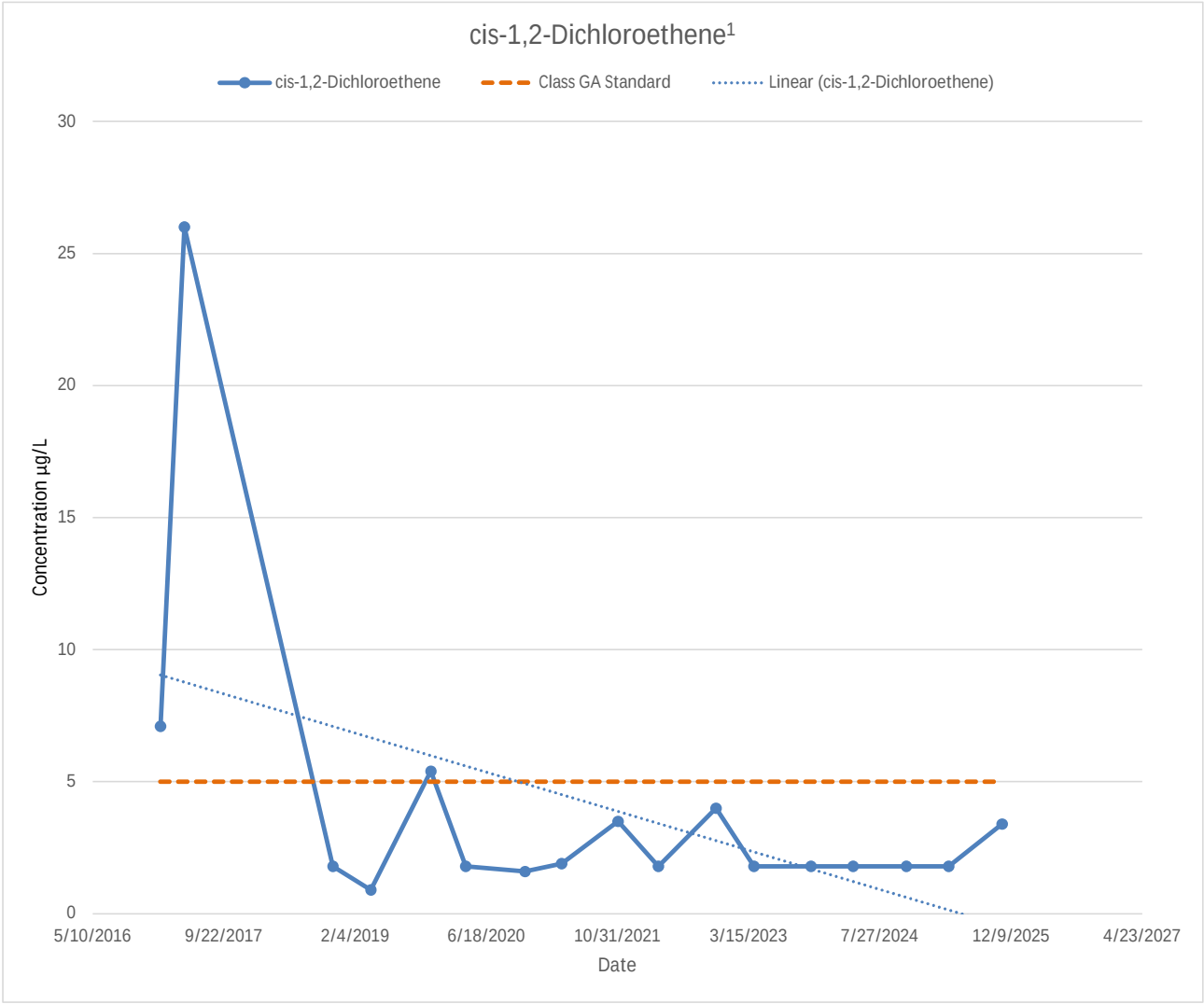
Table 14
MW-23S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



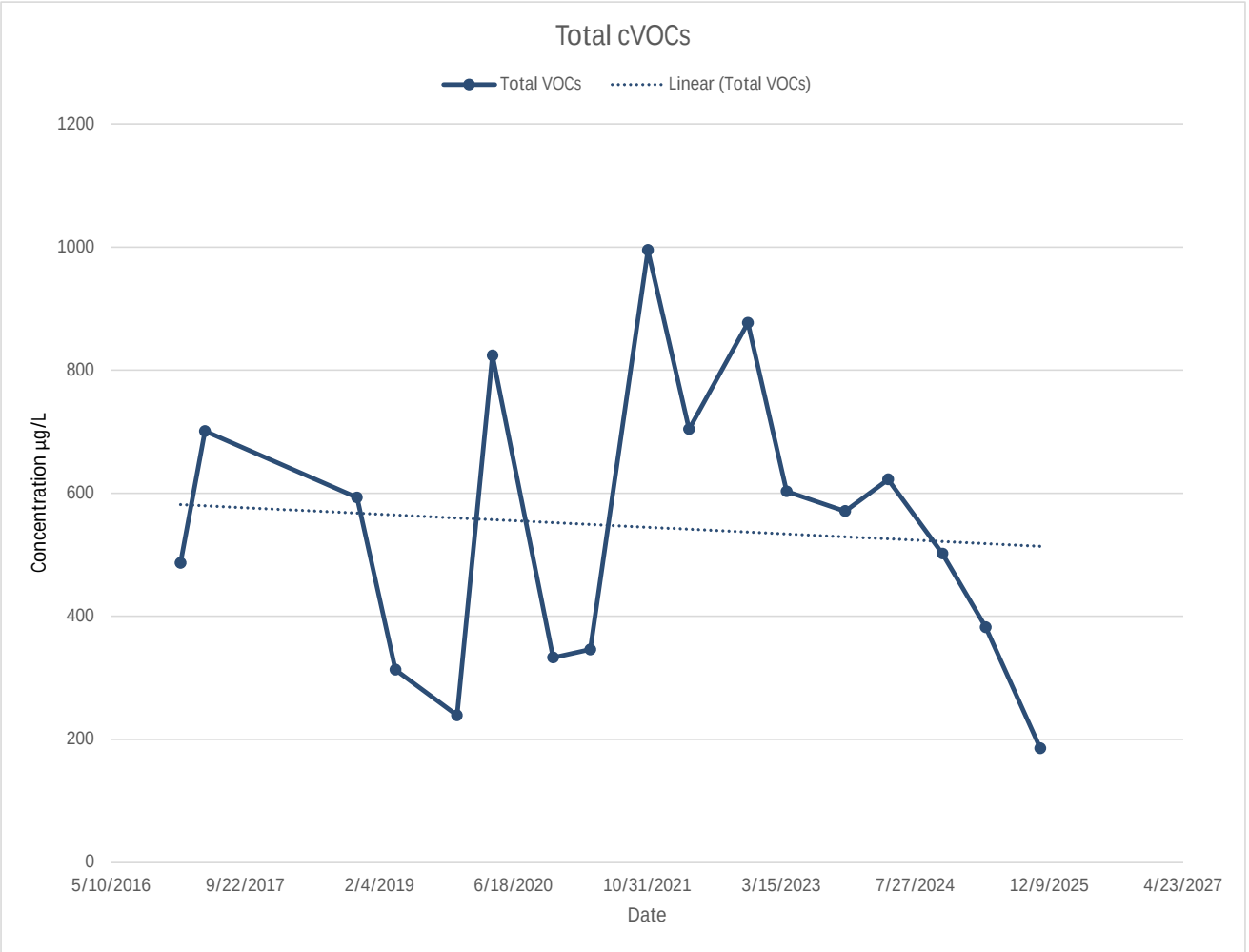
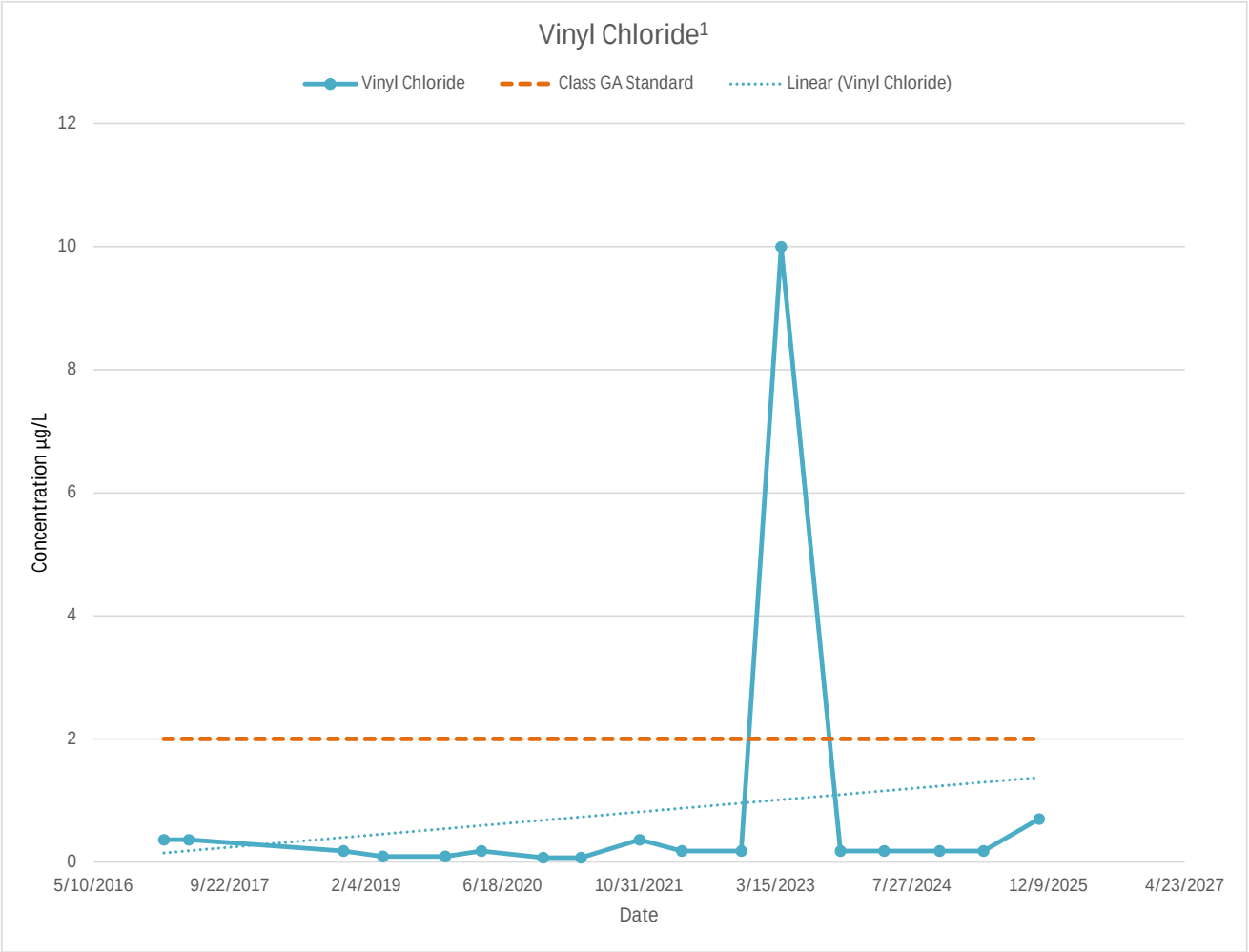
Table 14
MW-23S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



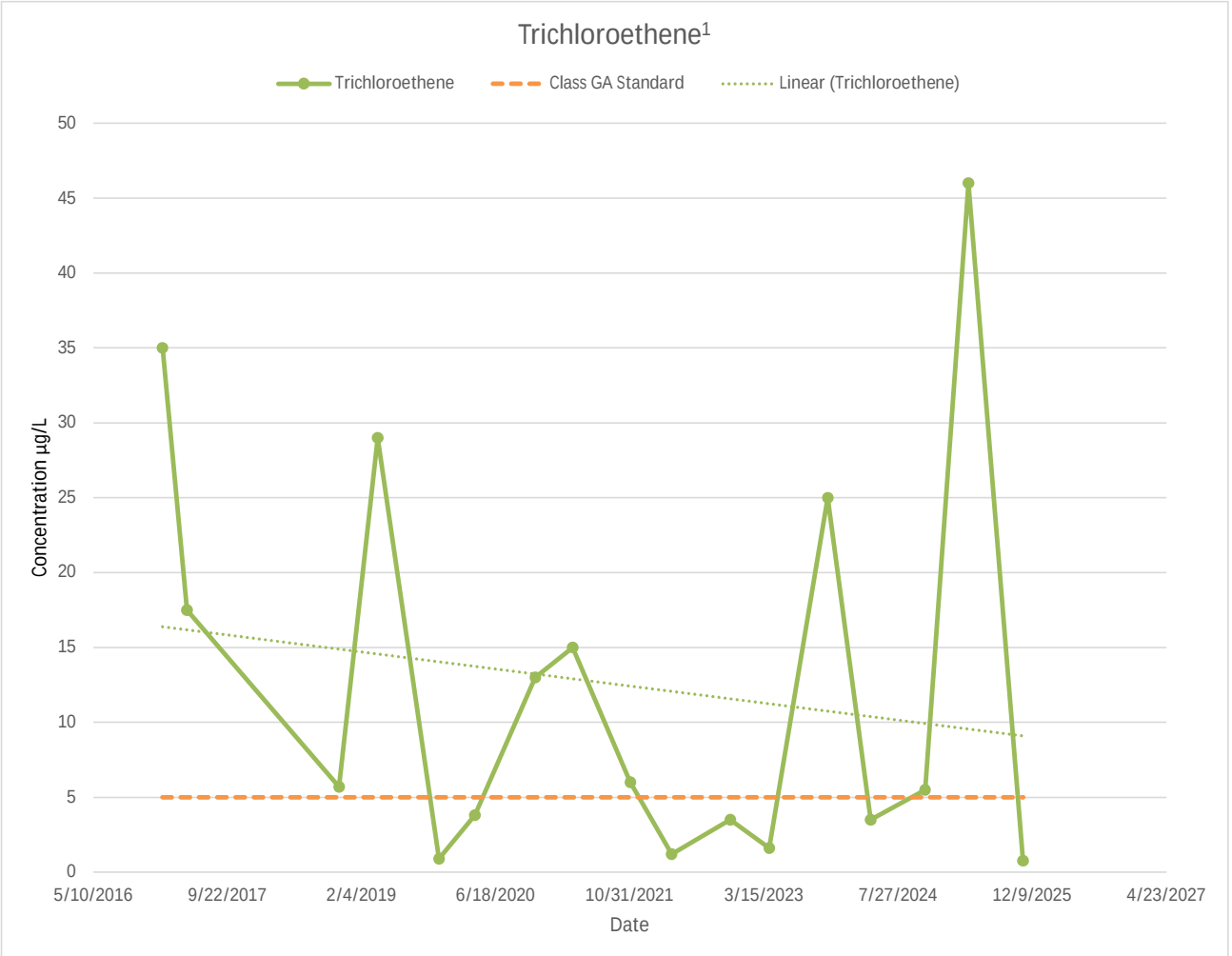
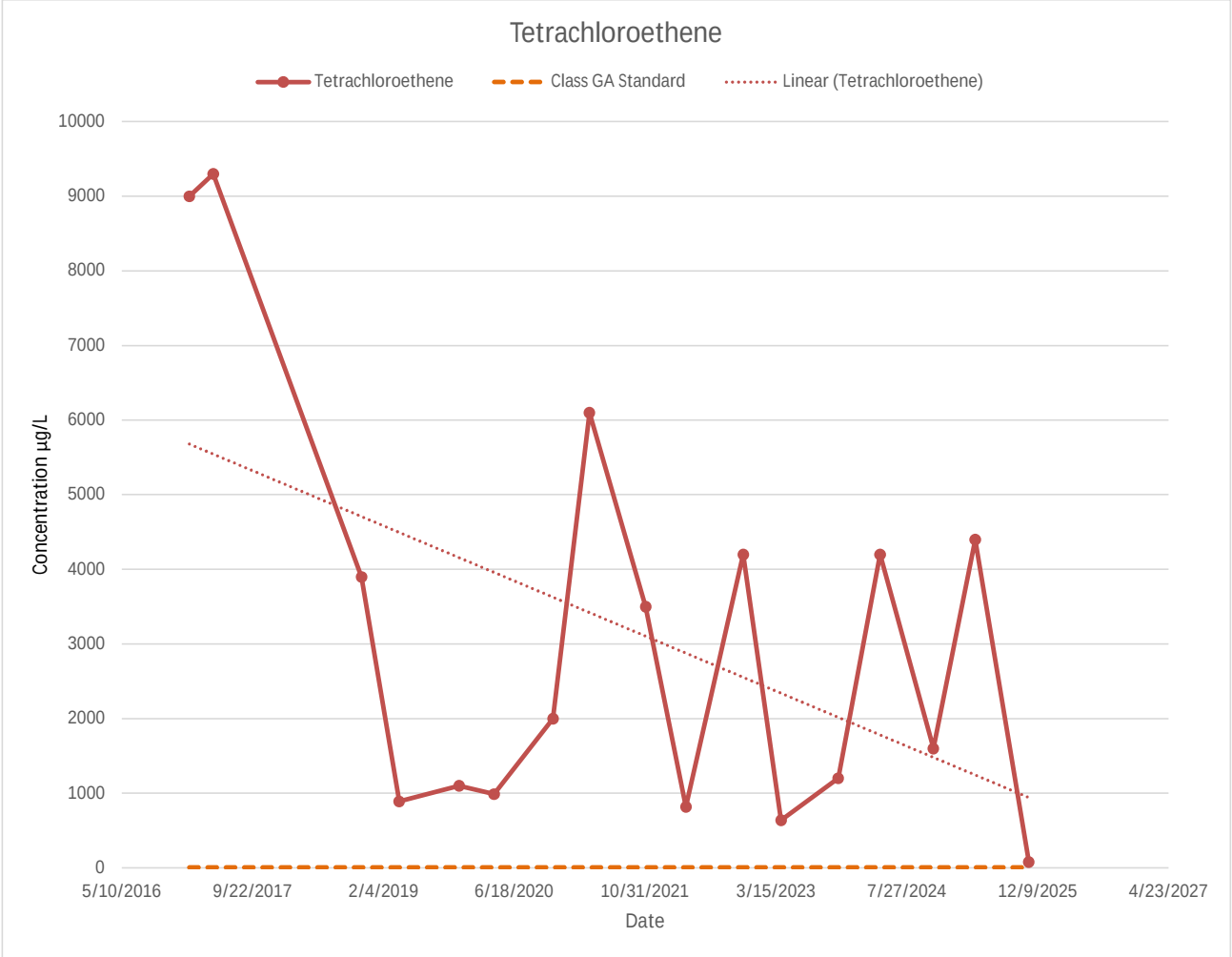
Table 14
MW-23S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



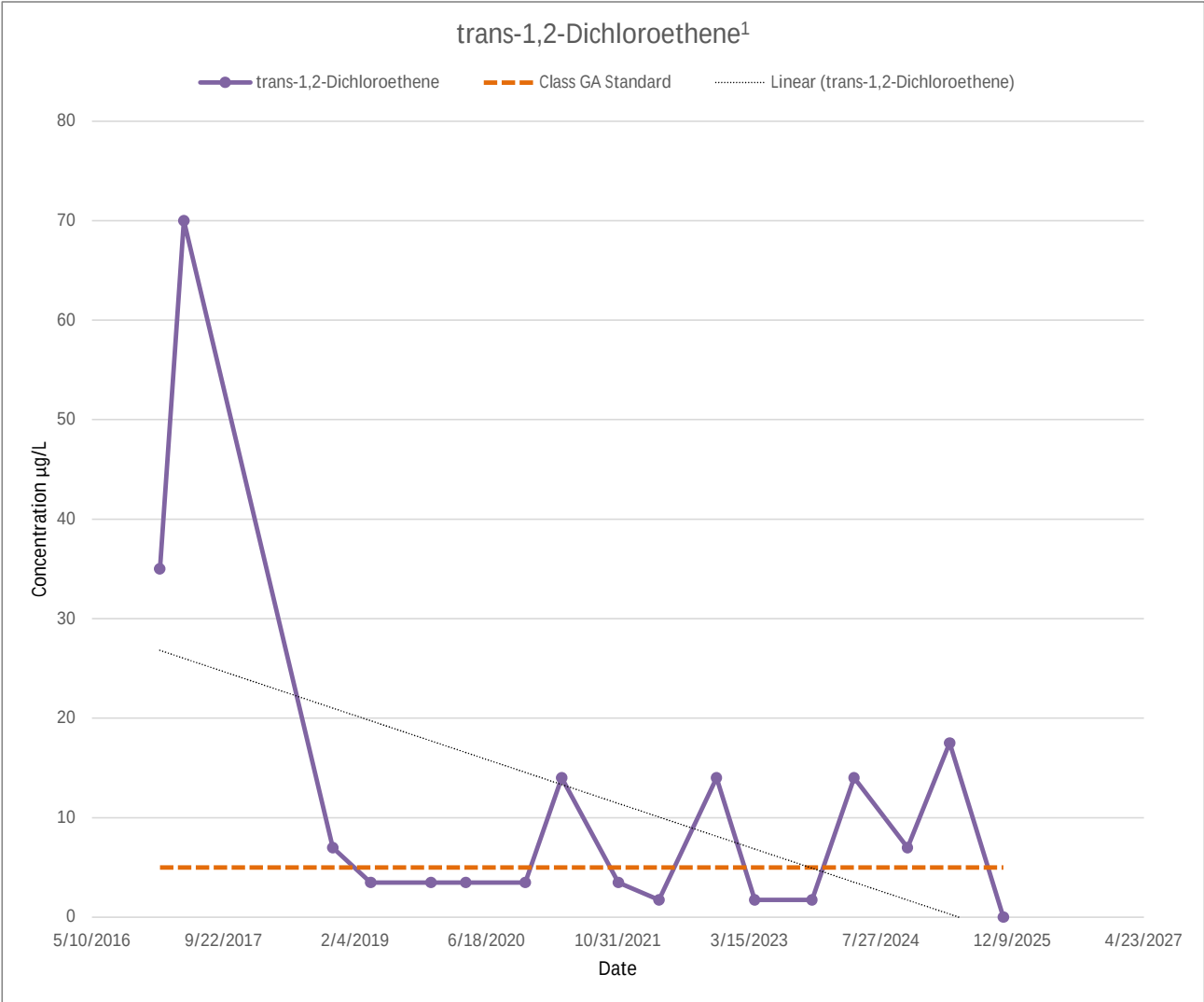
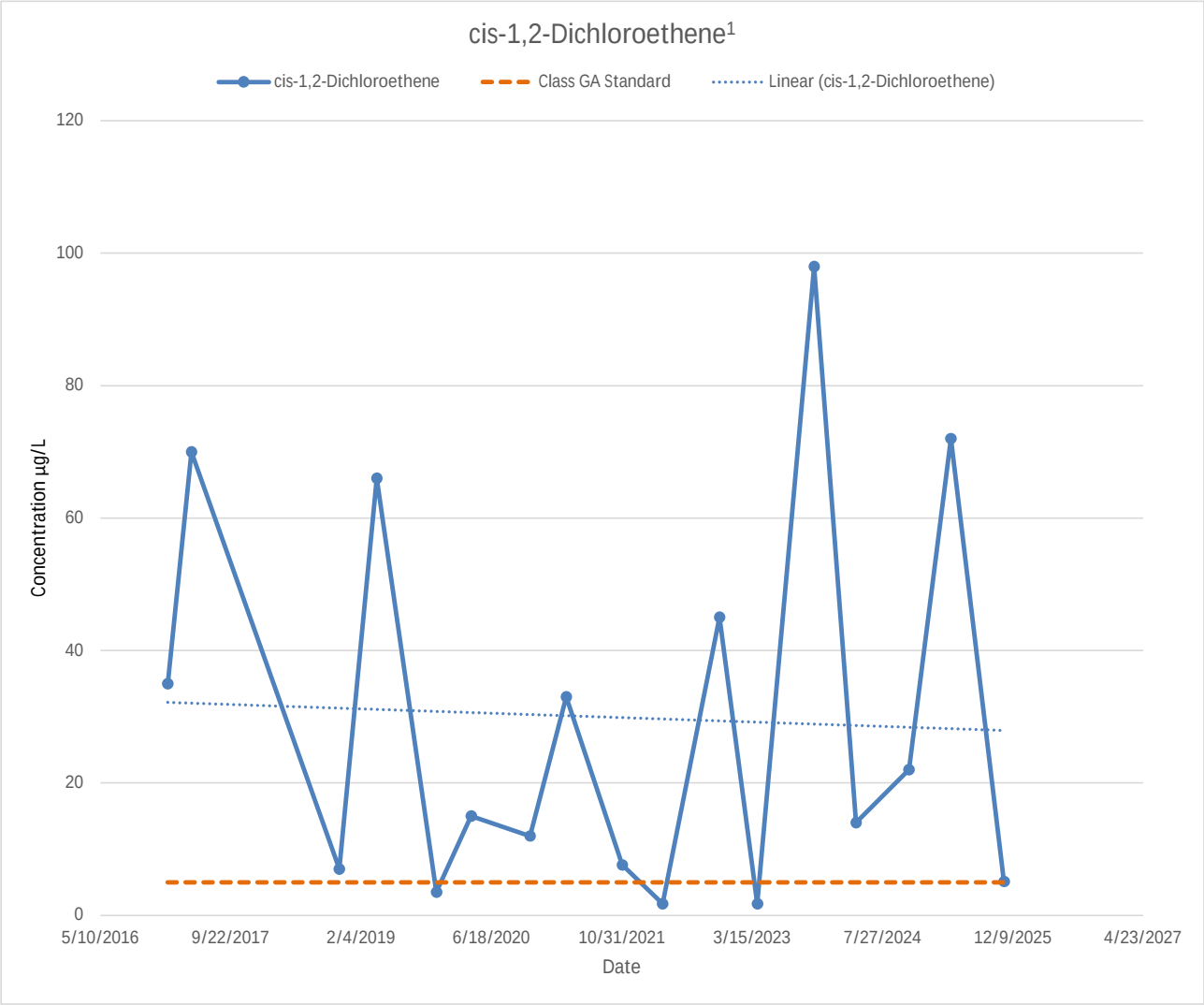
Table 16
MW-24S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



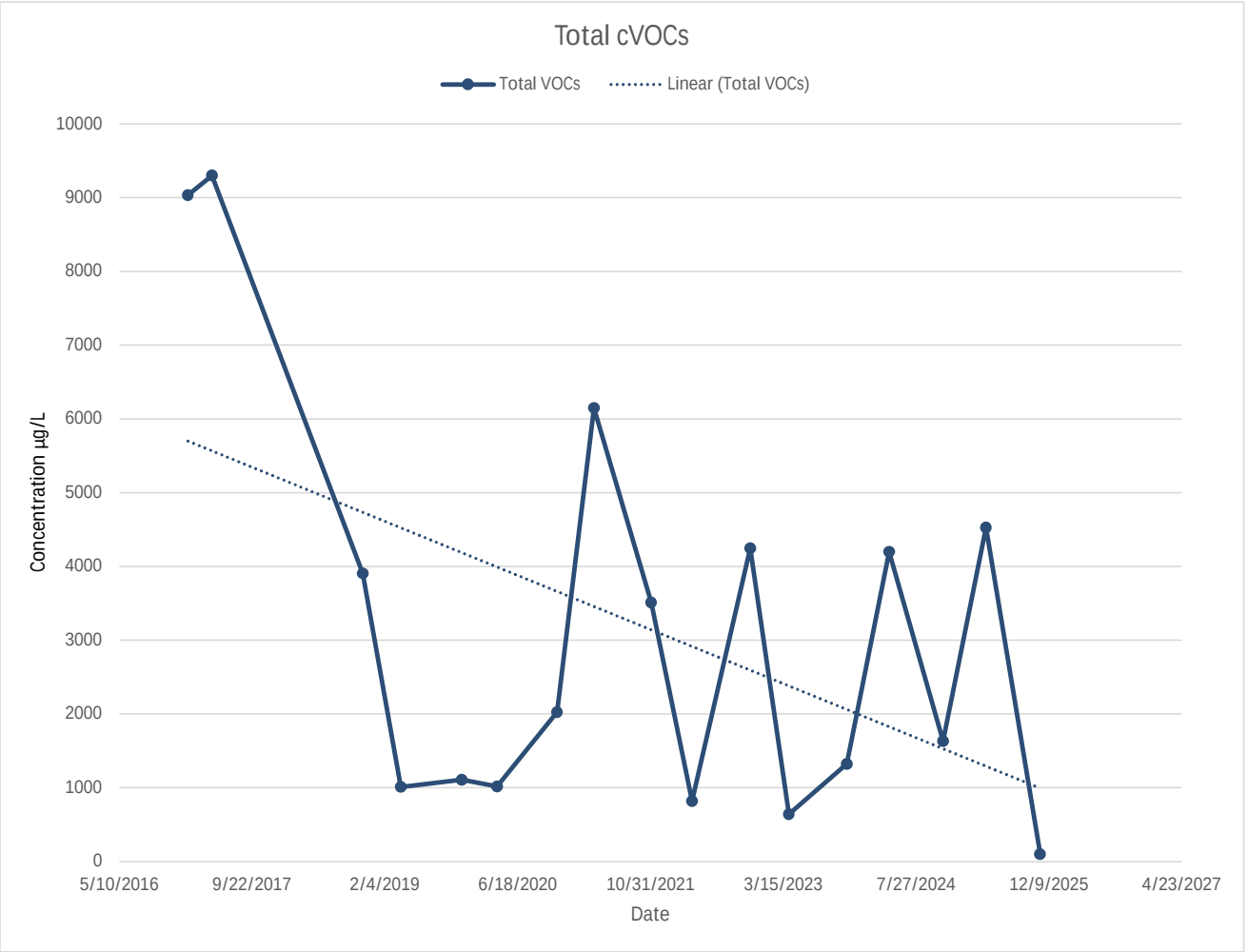
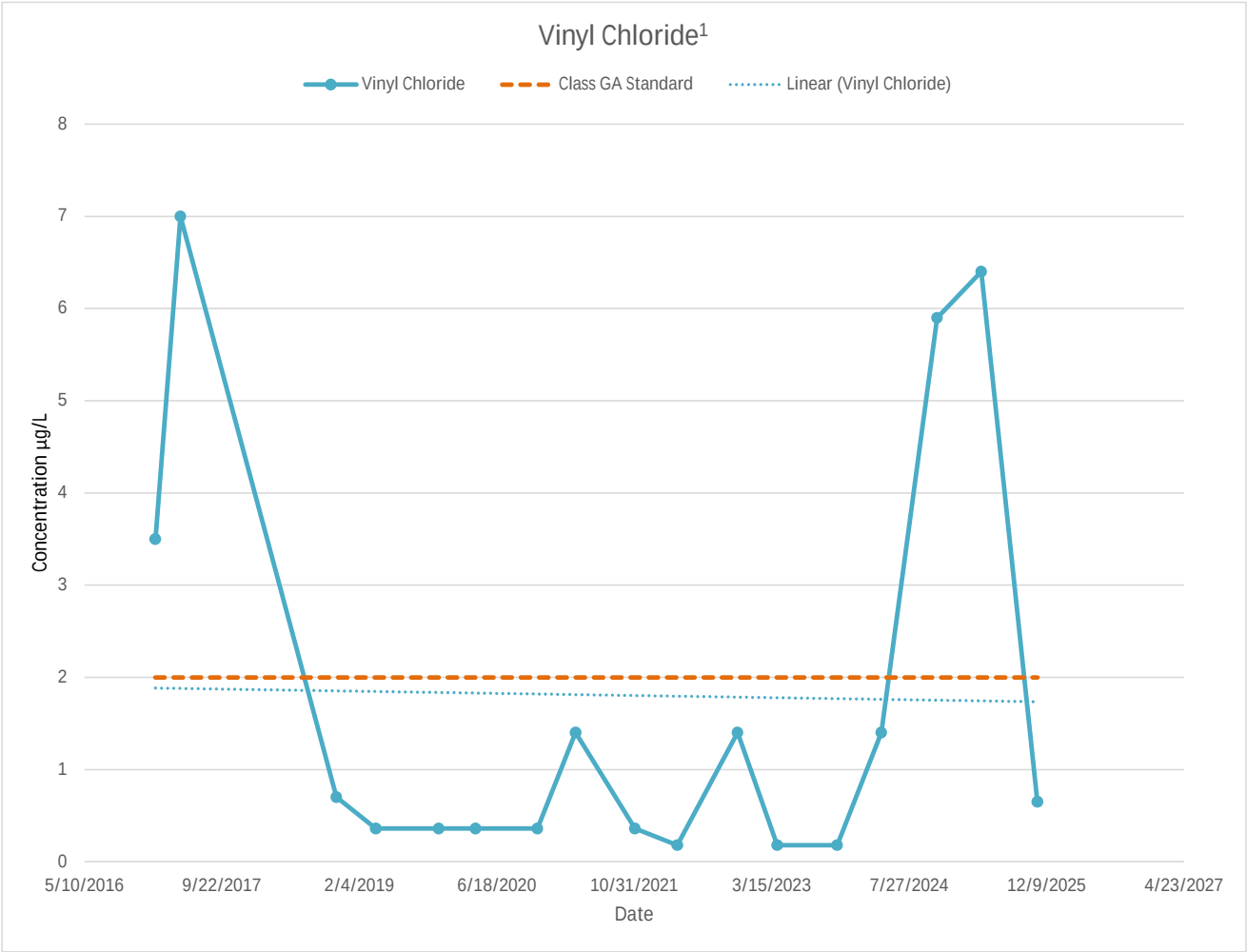
Table 16
MW-24S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



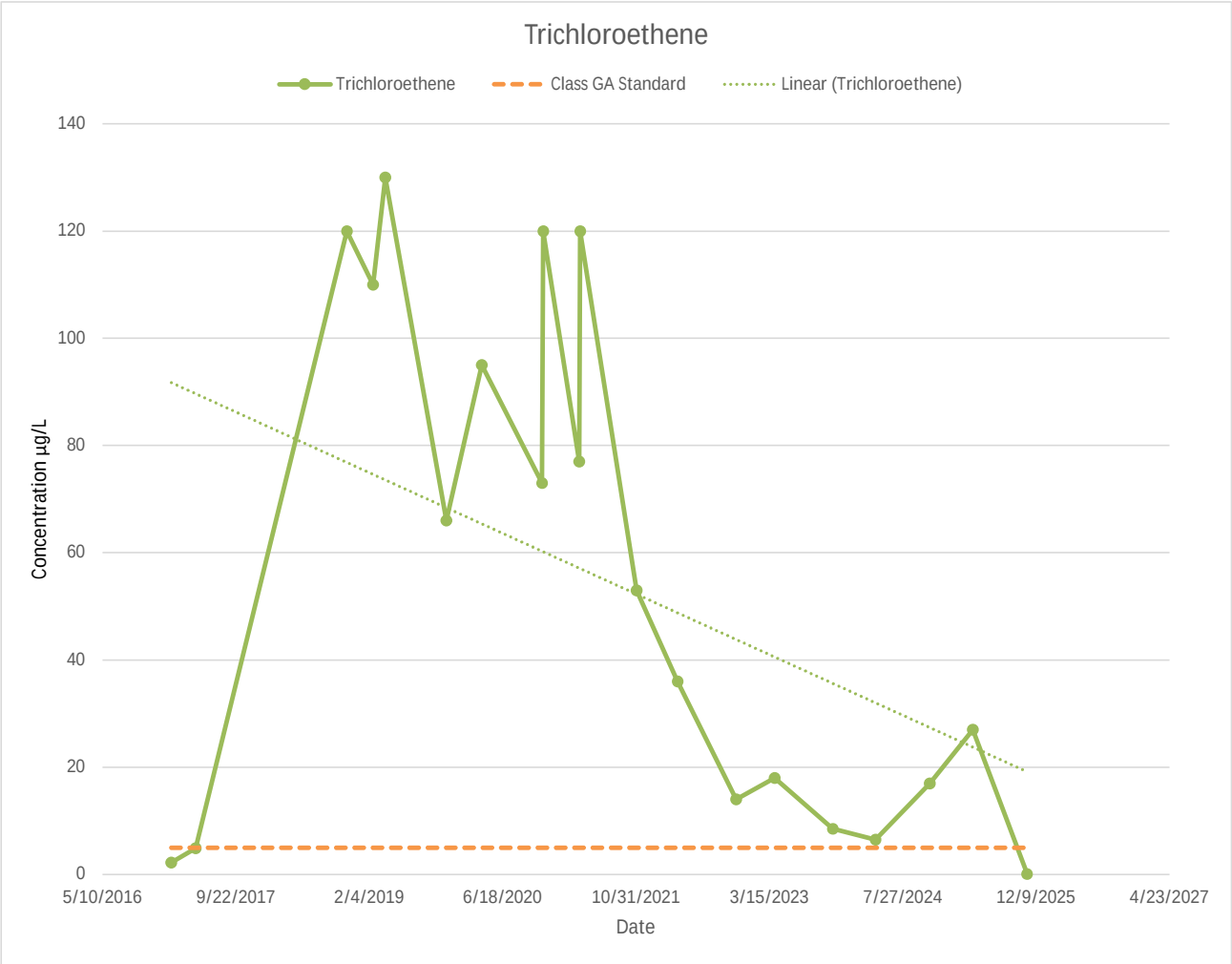
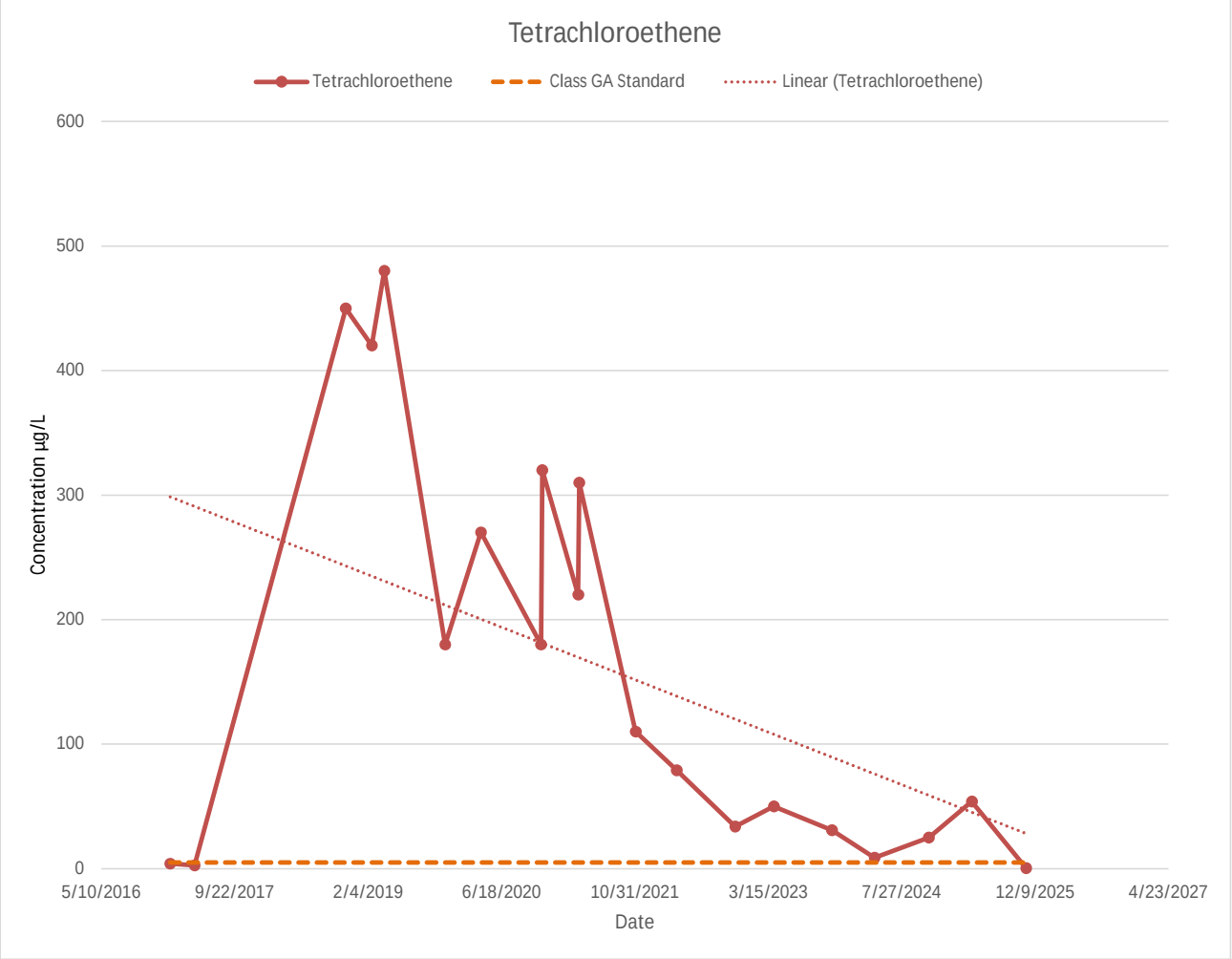
Table 16
MW-24S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



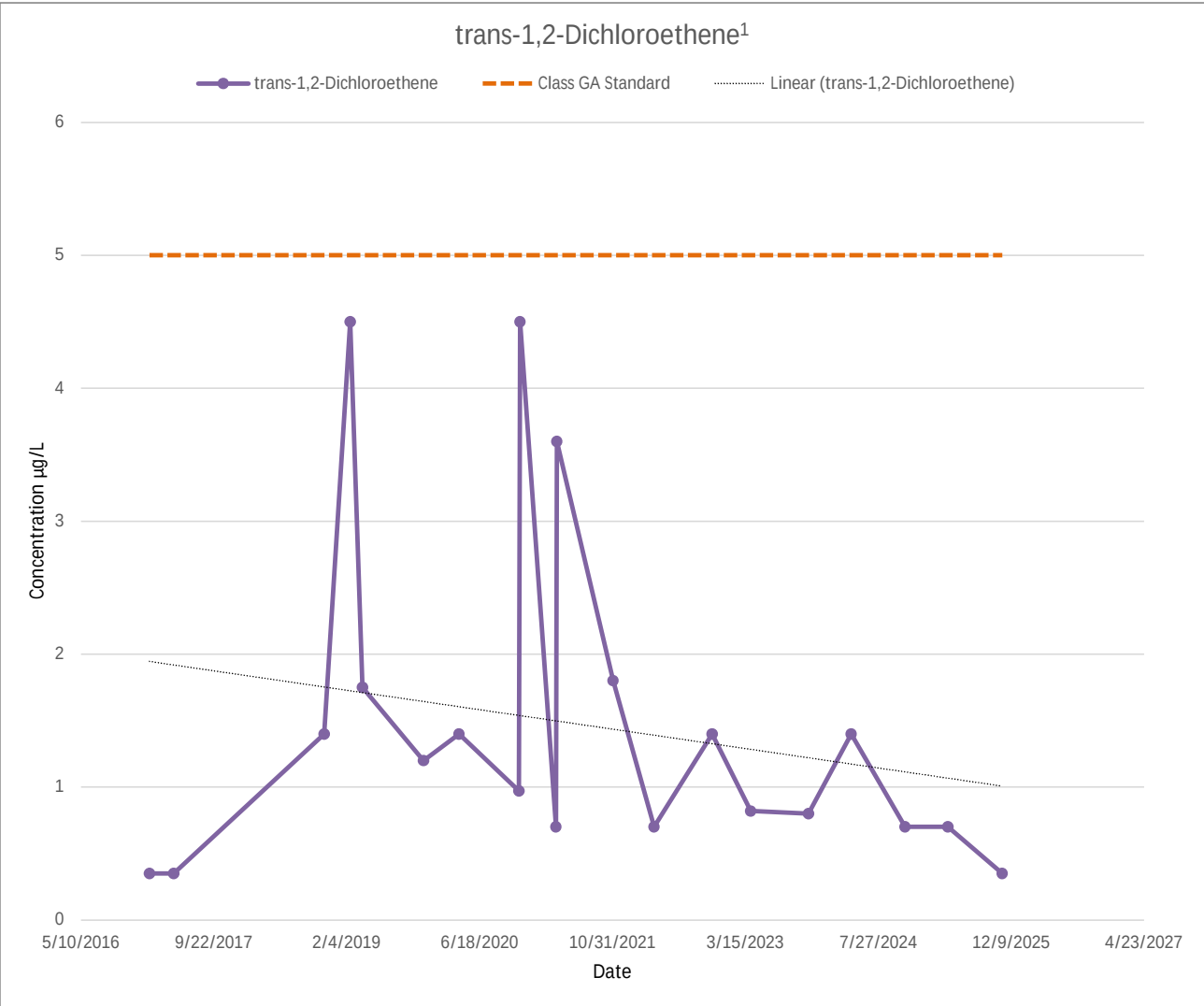
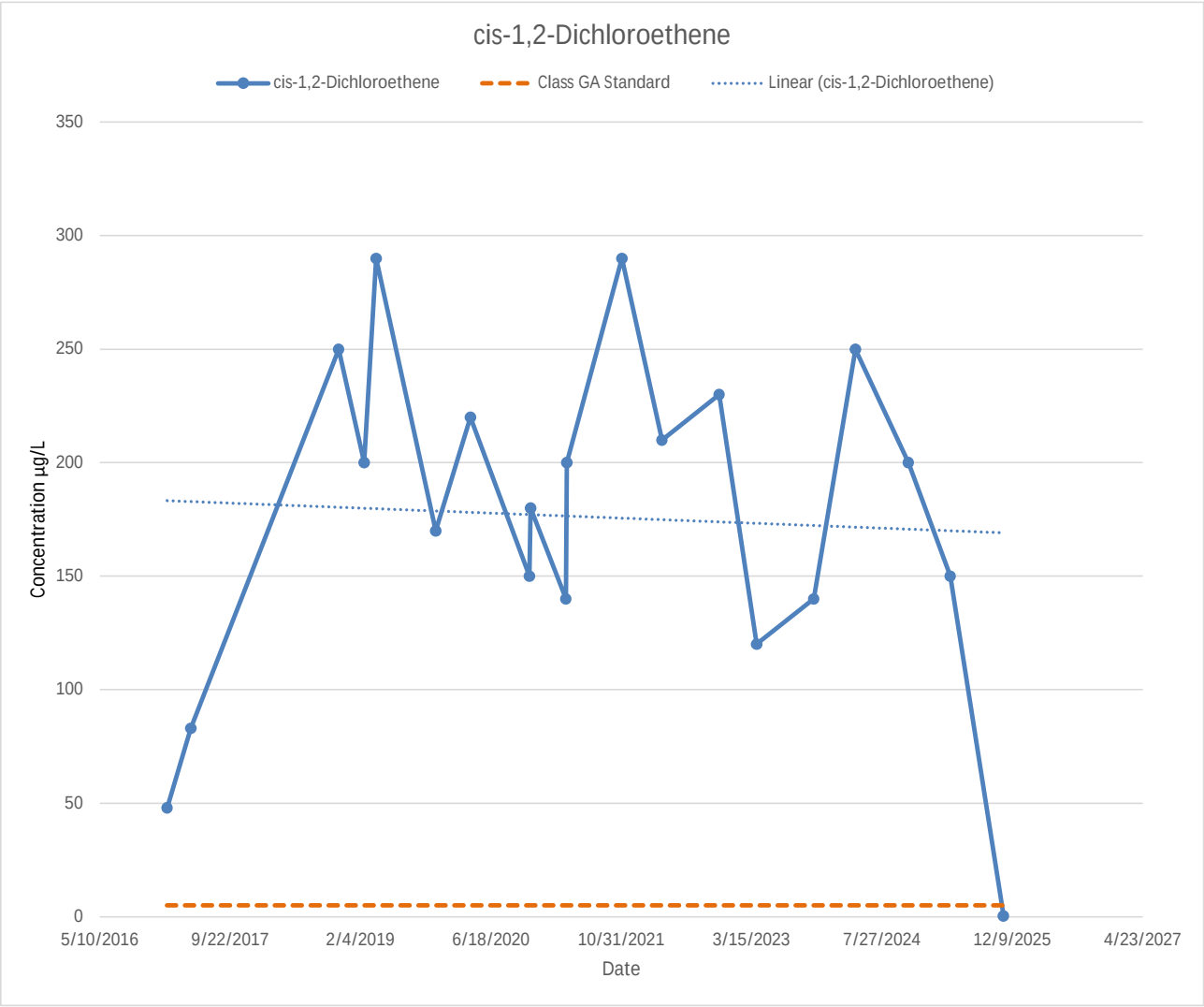
Table 15
MW-24D Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



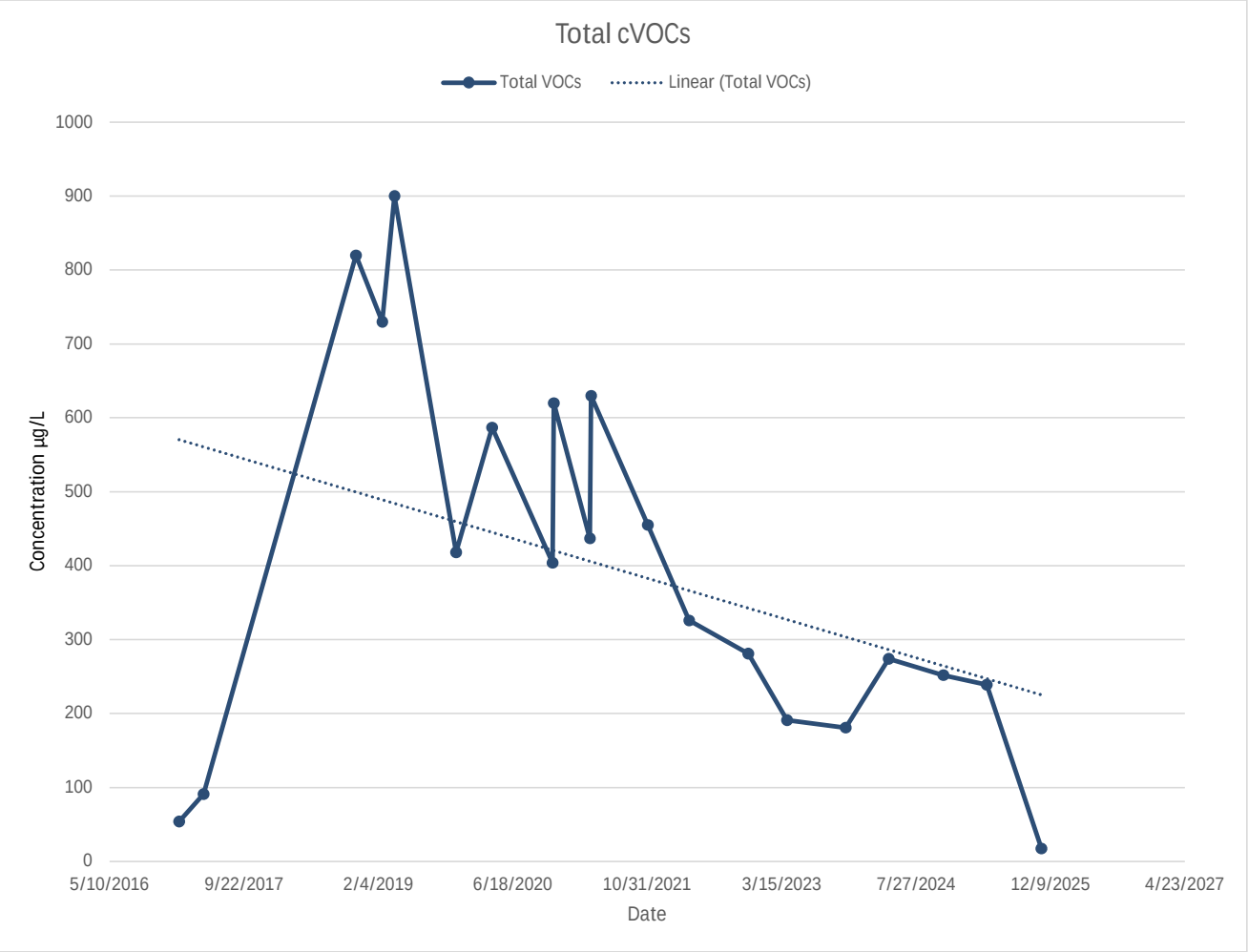
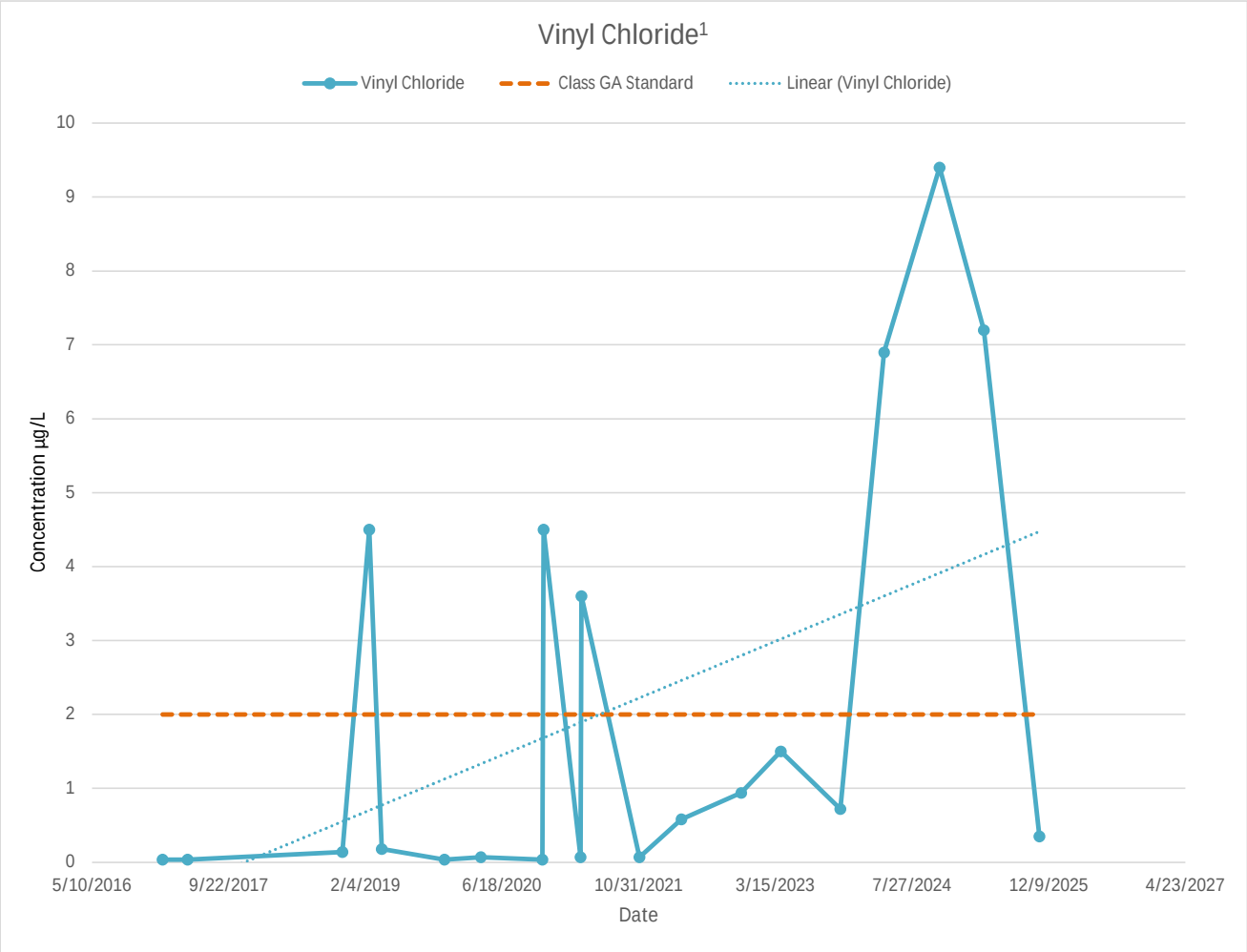
Table 15
MW-24D Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



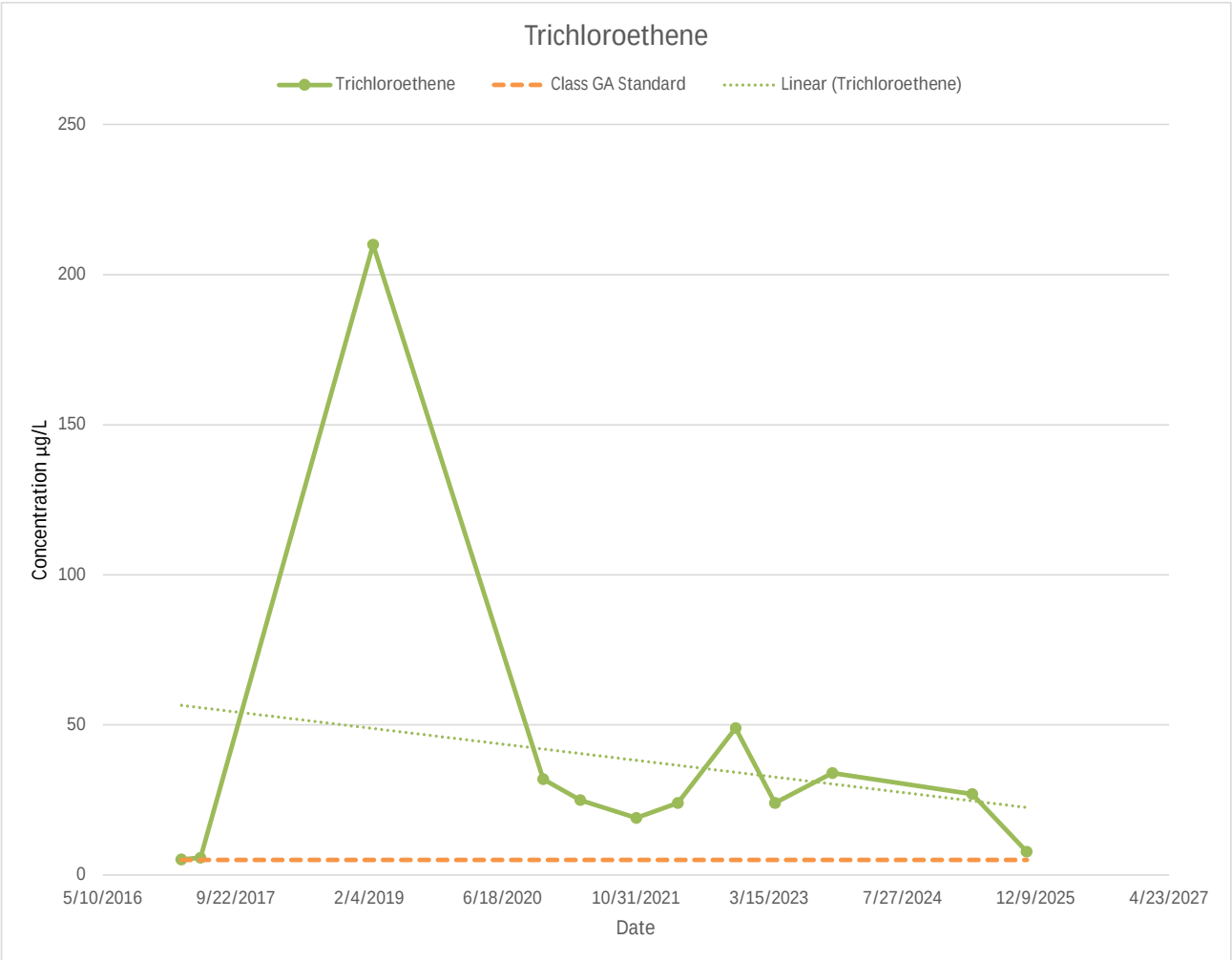
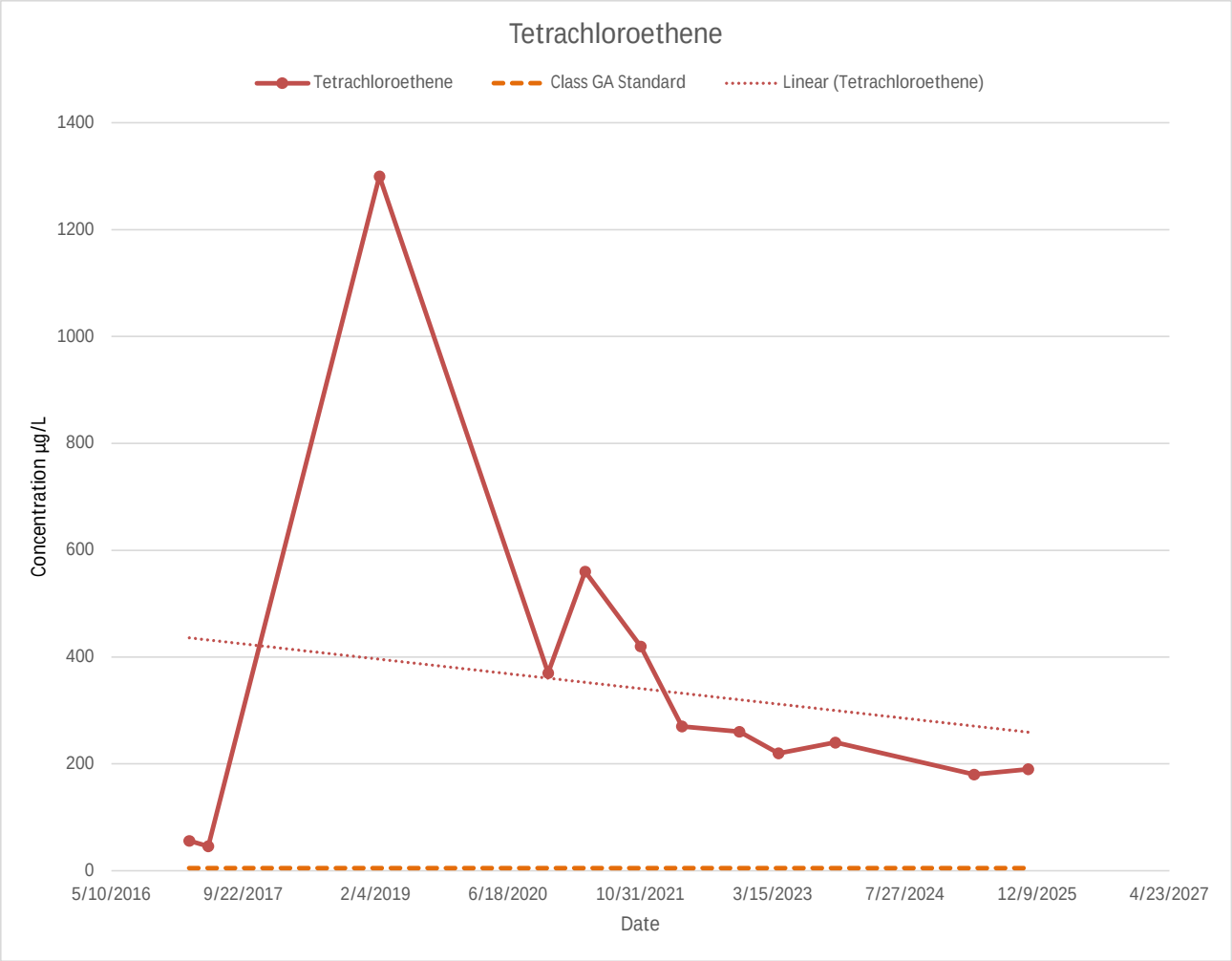
Table 15
MW-24D Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



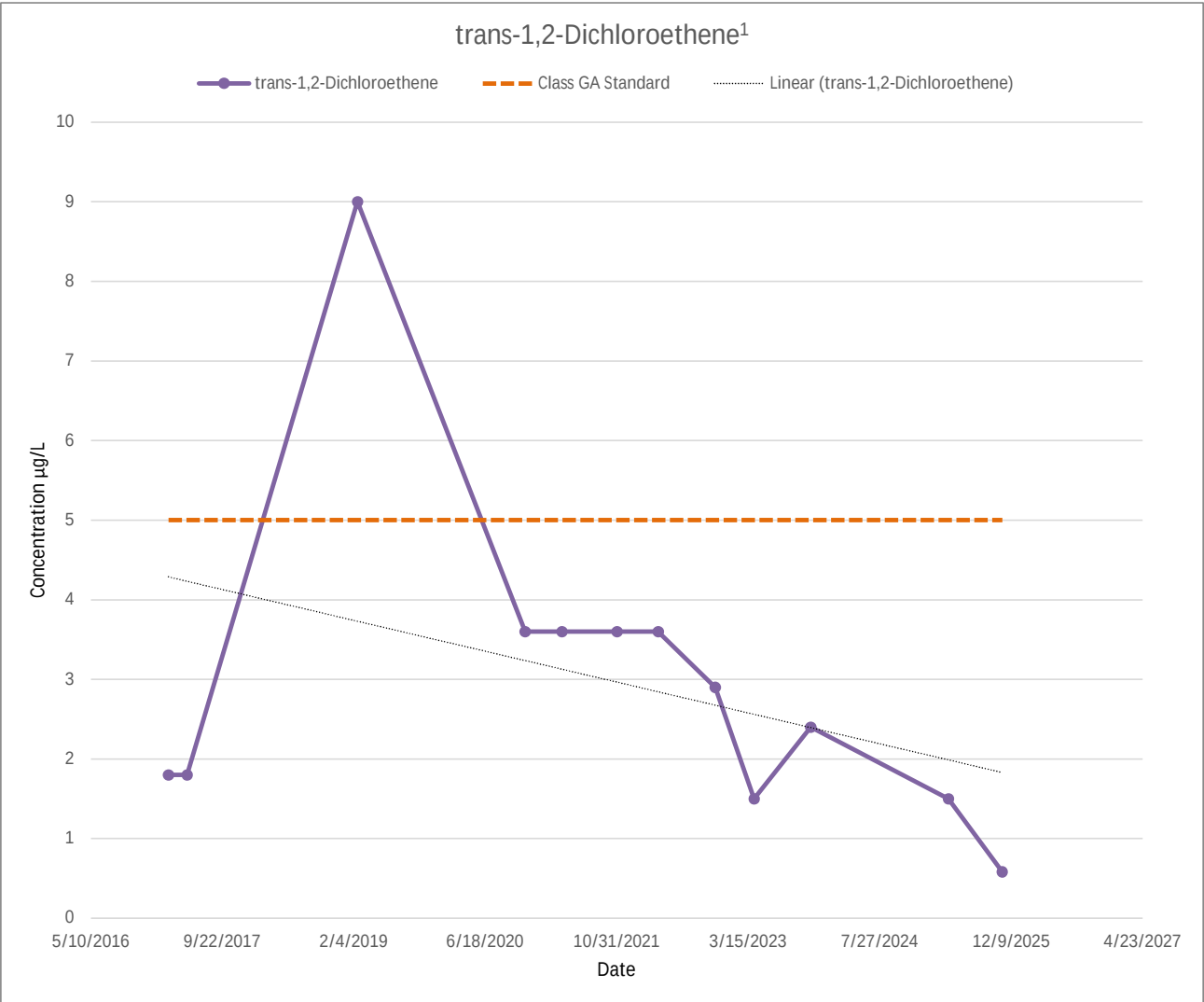
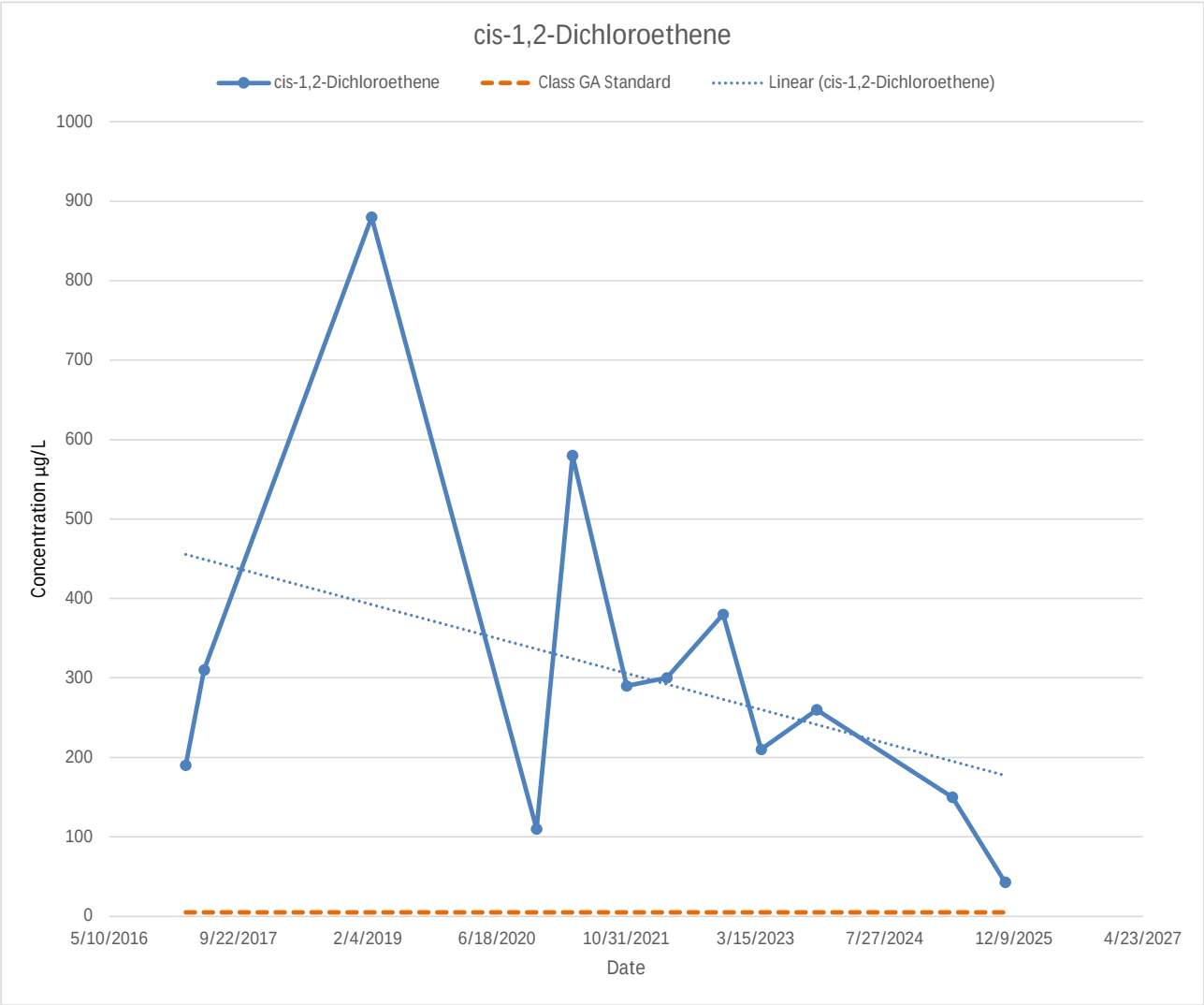
Table 17
MW-25S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



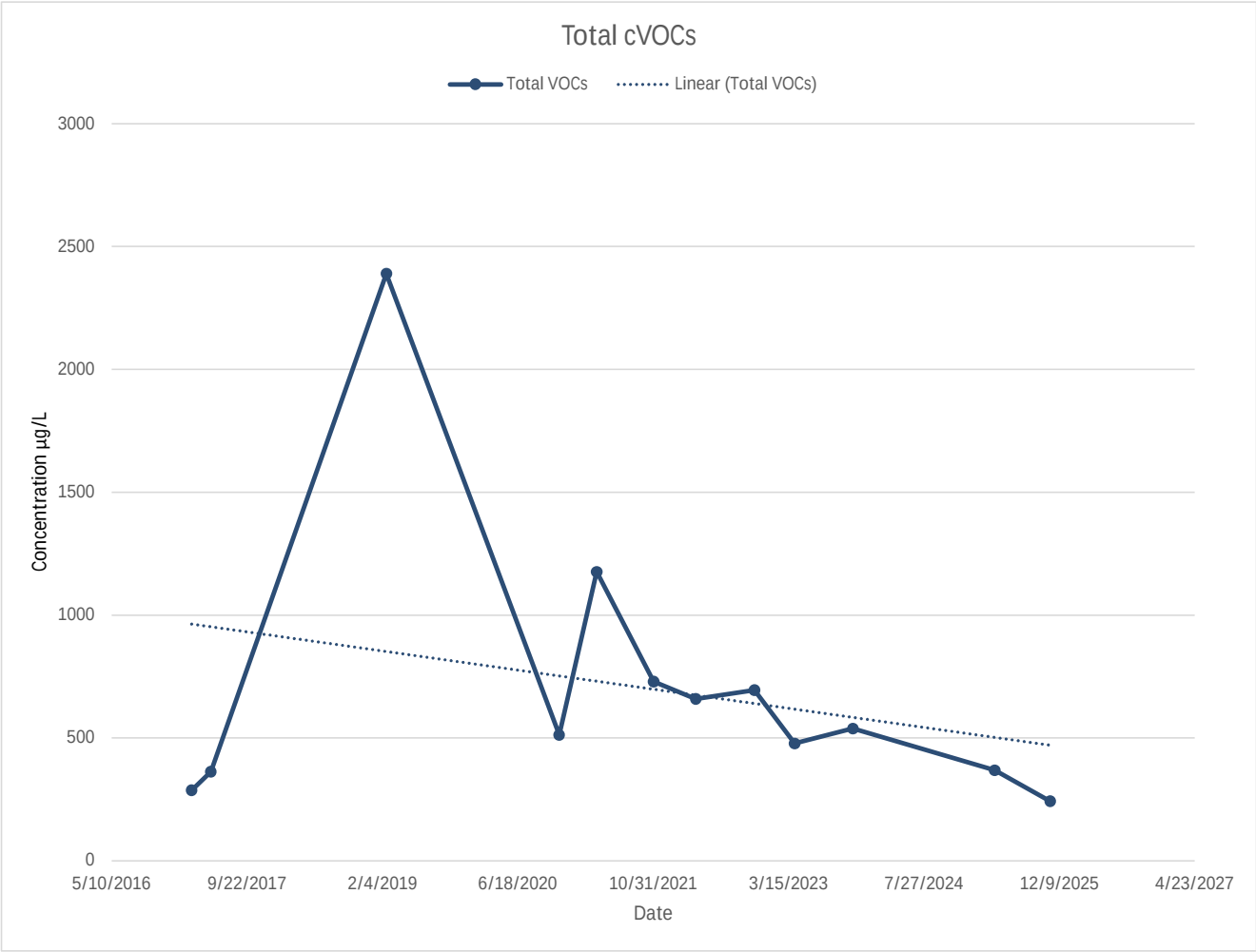
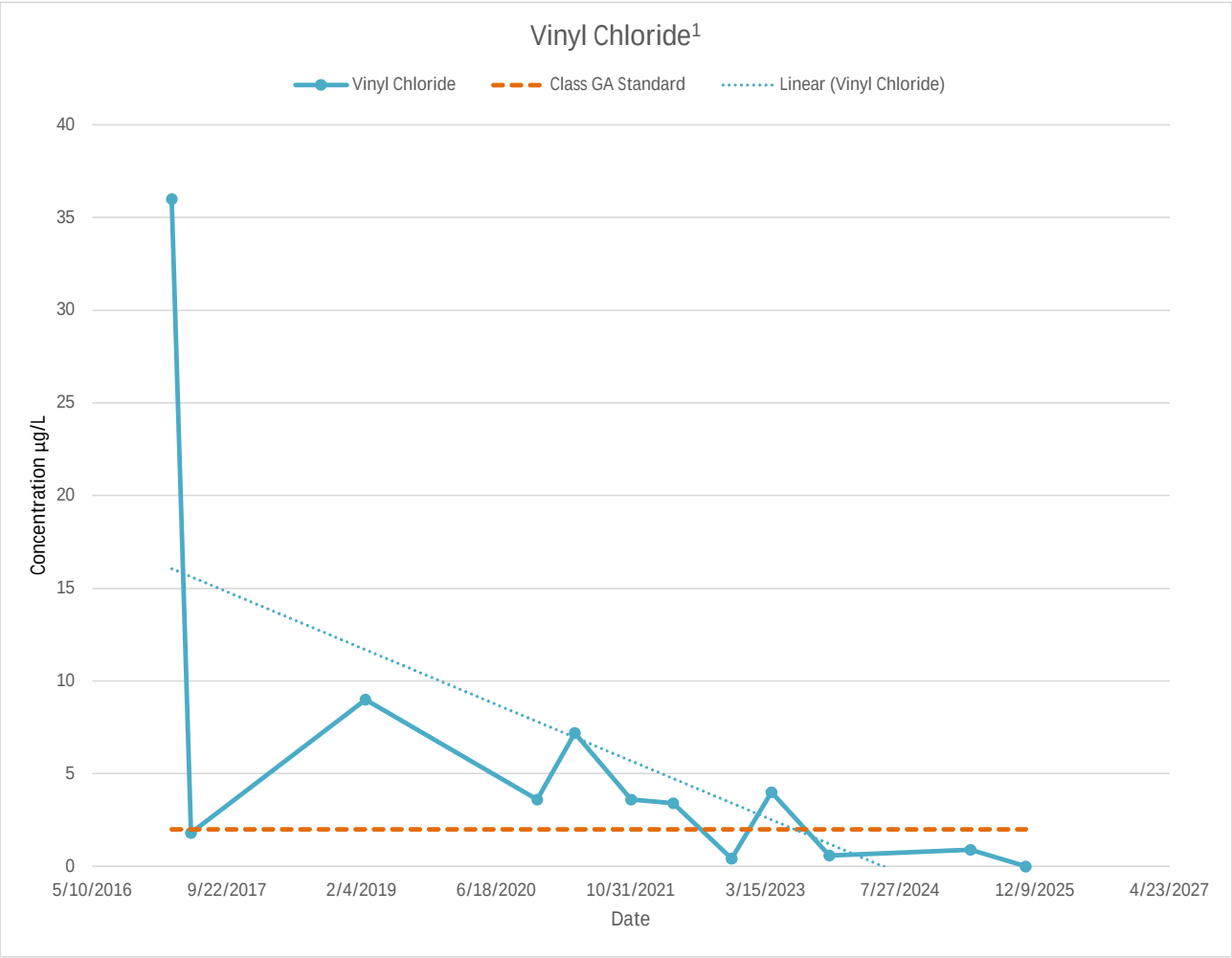
Table 17
MW-25S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



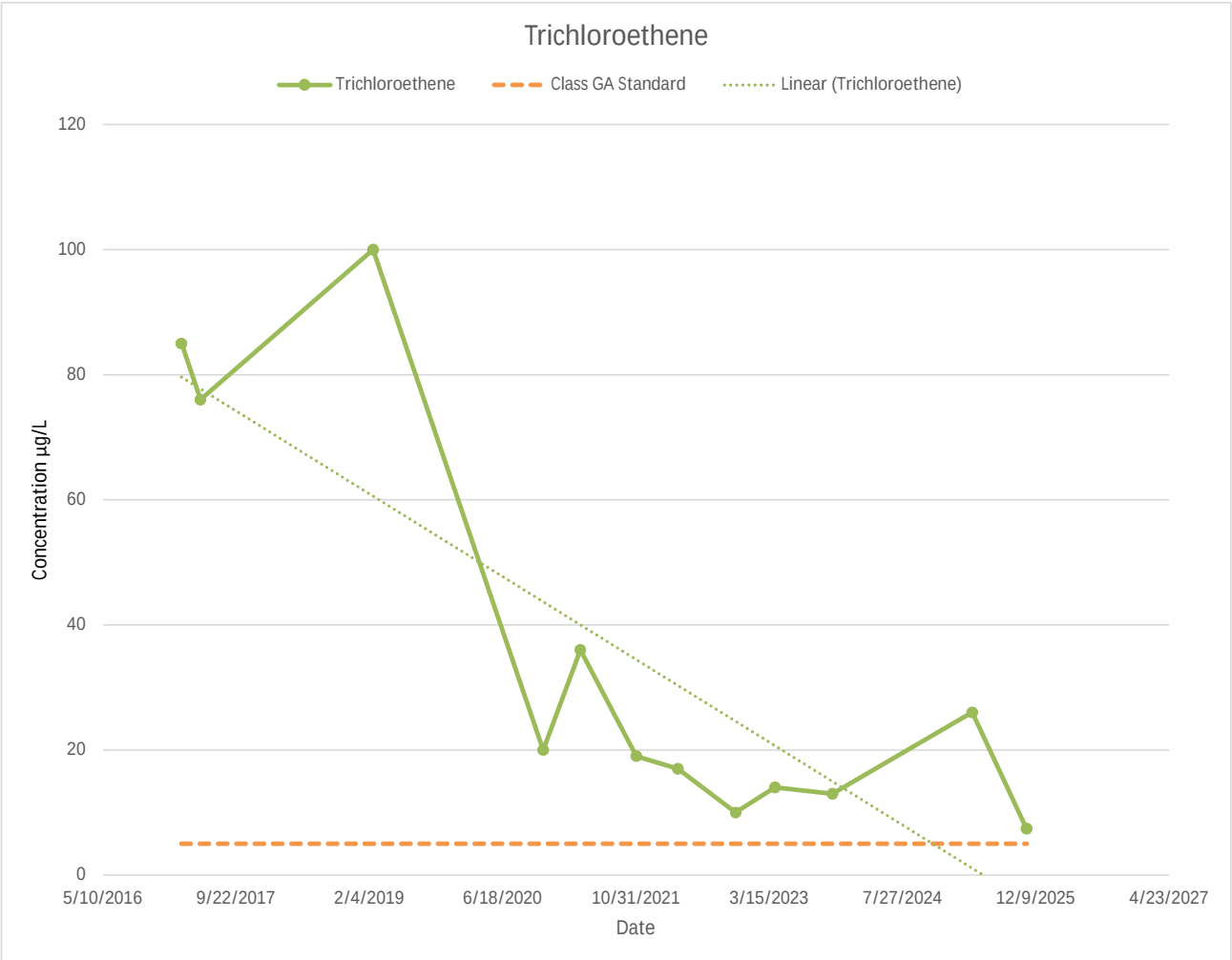
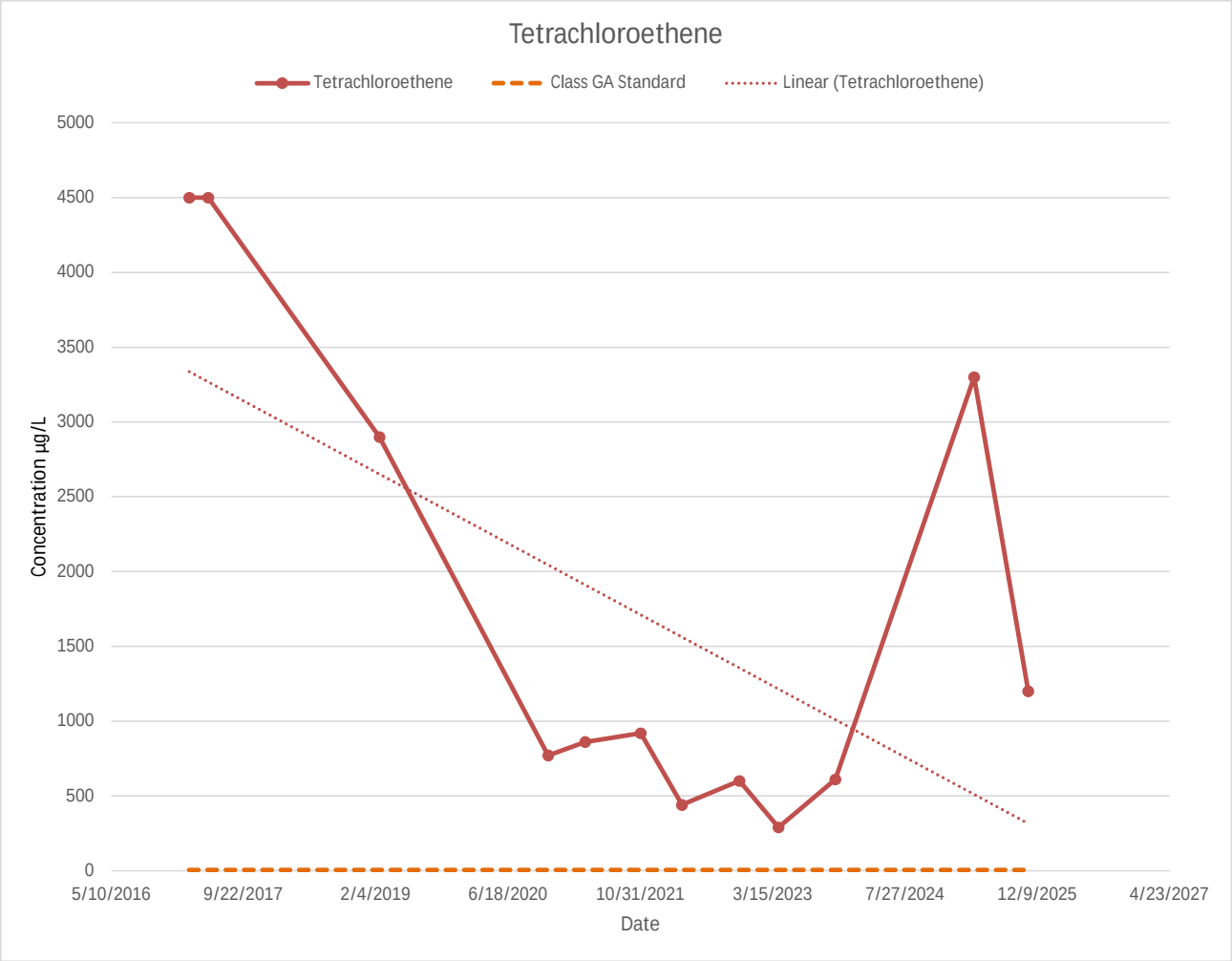
Table 17
MW-25S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



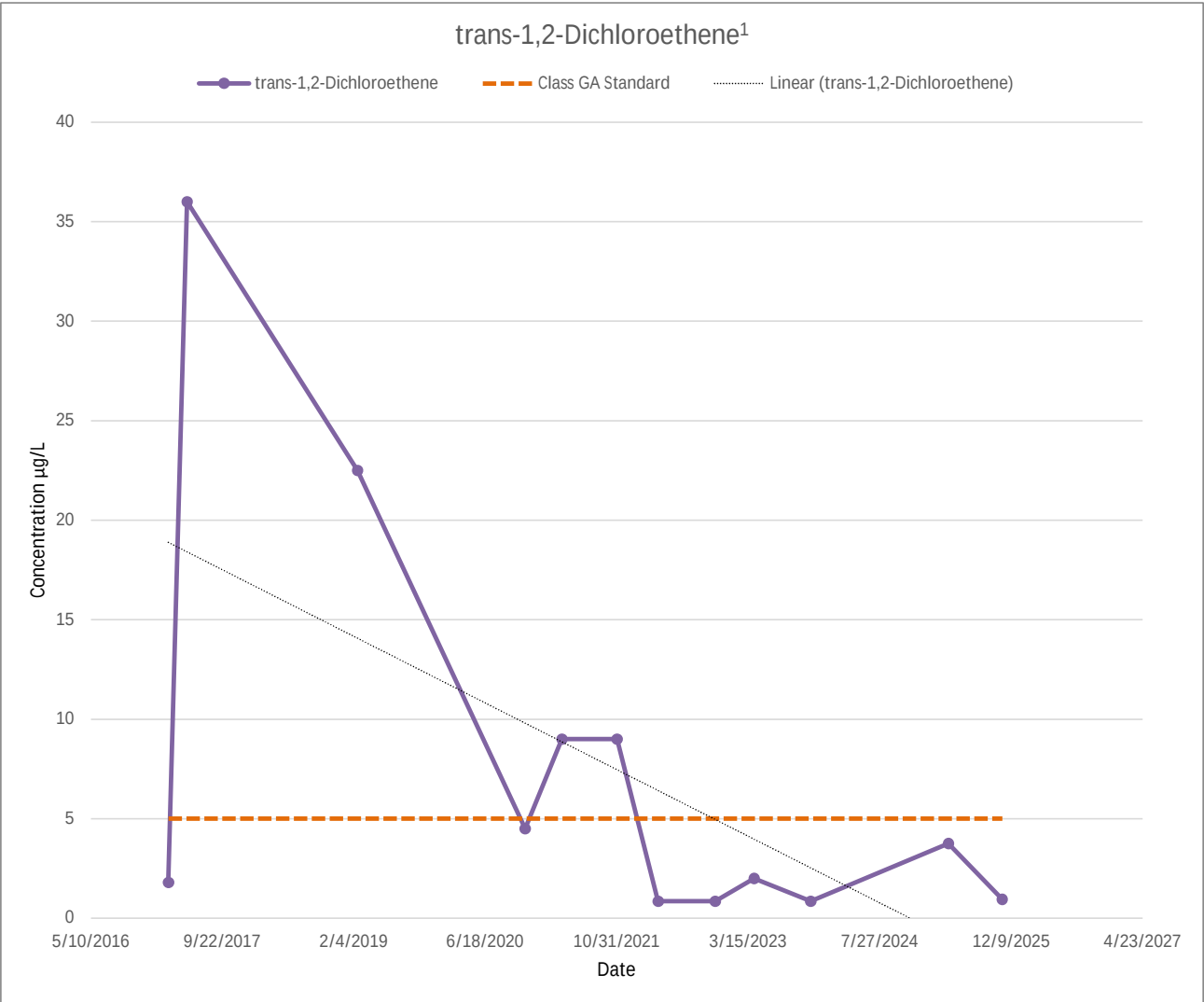
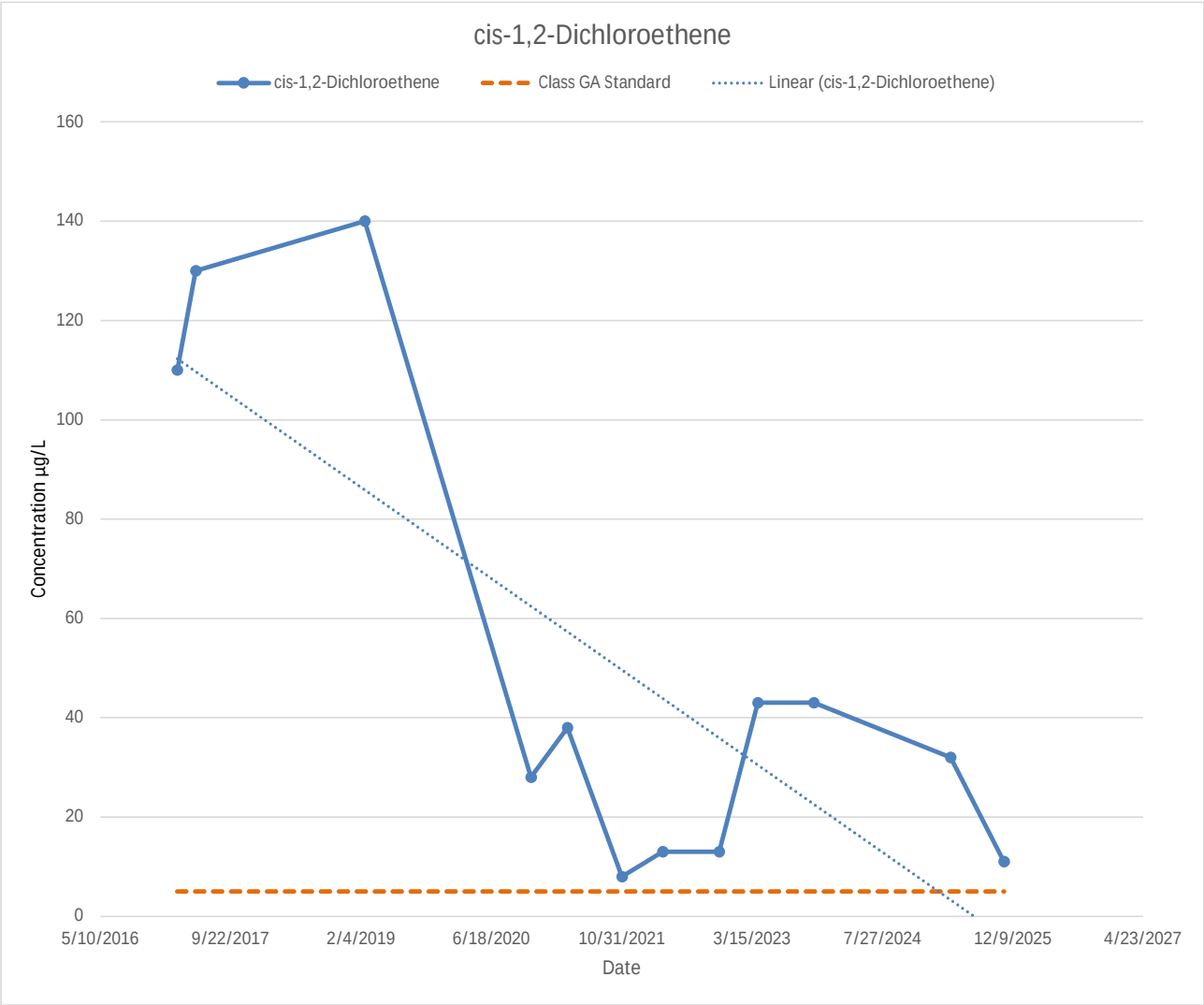
Table 18
MW-26S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



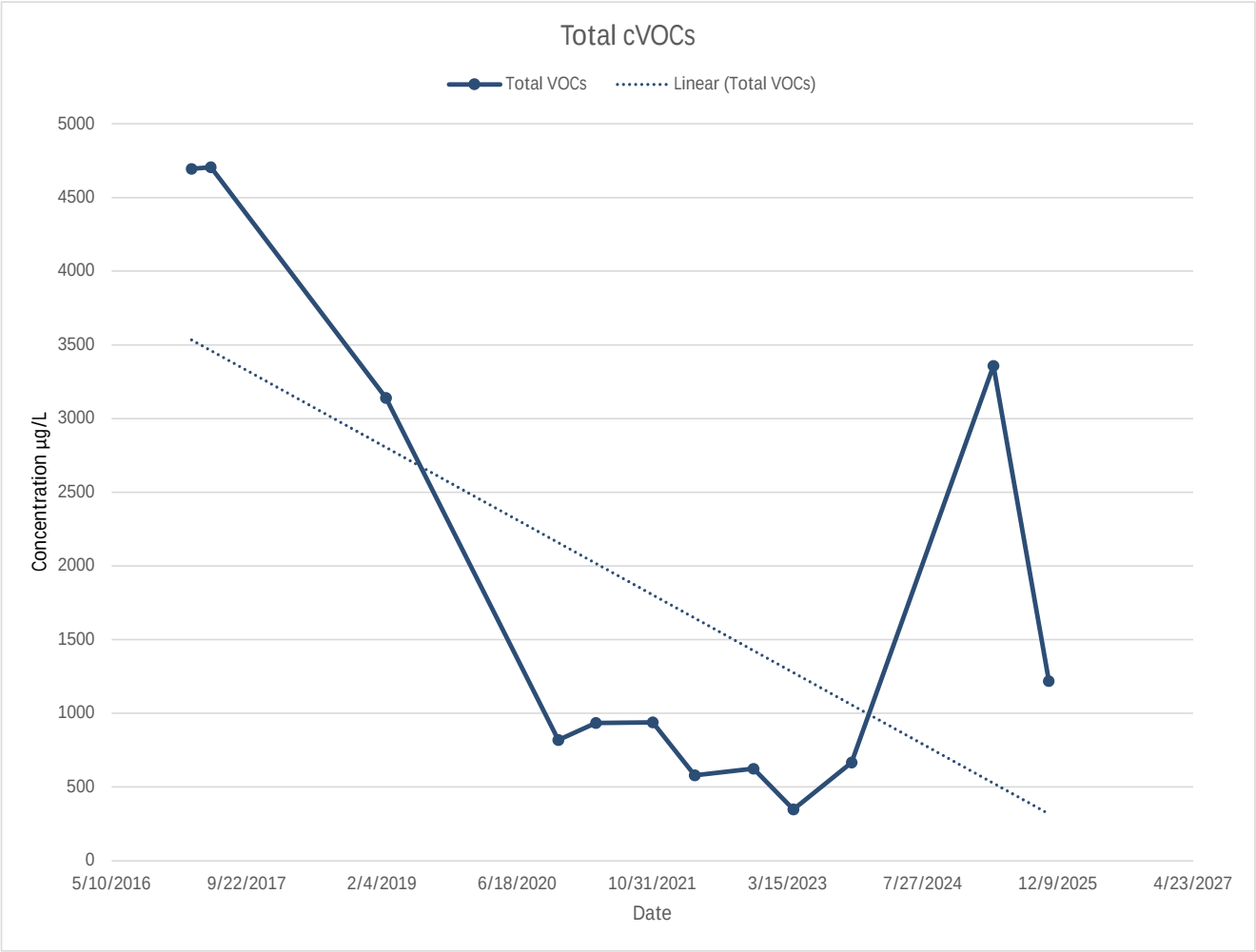
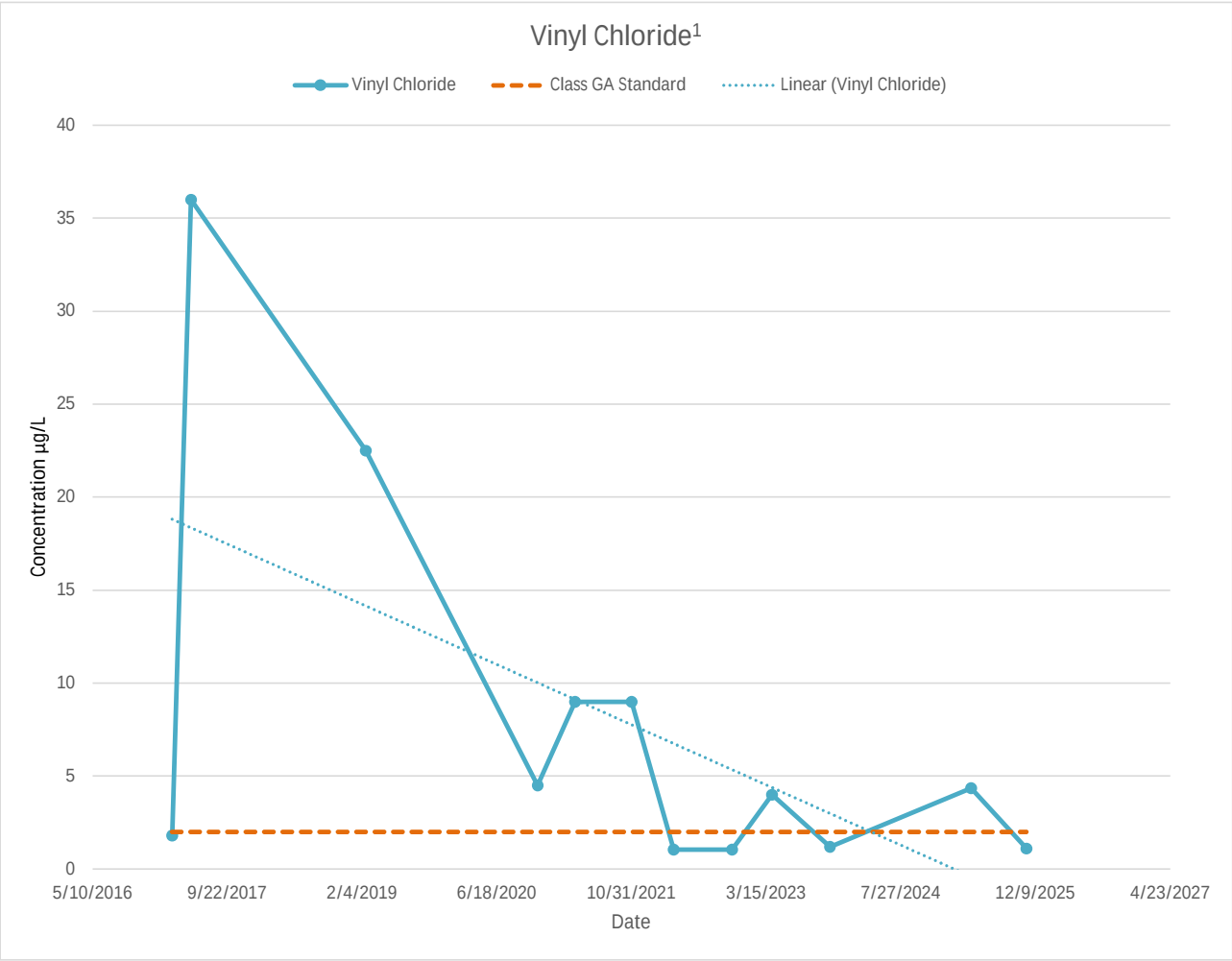
Table 18
MW-26S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



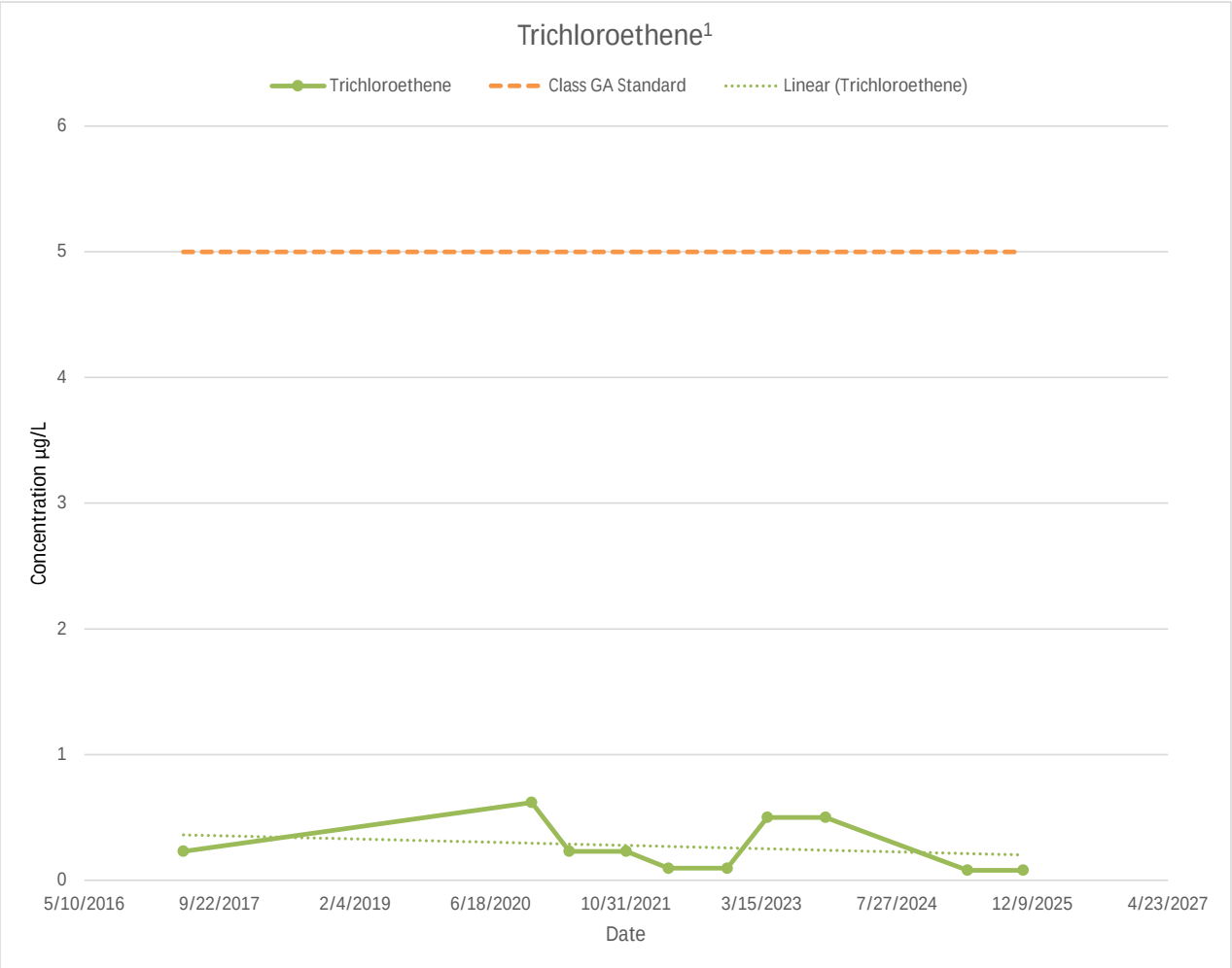
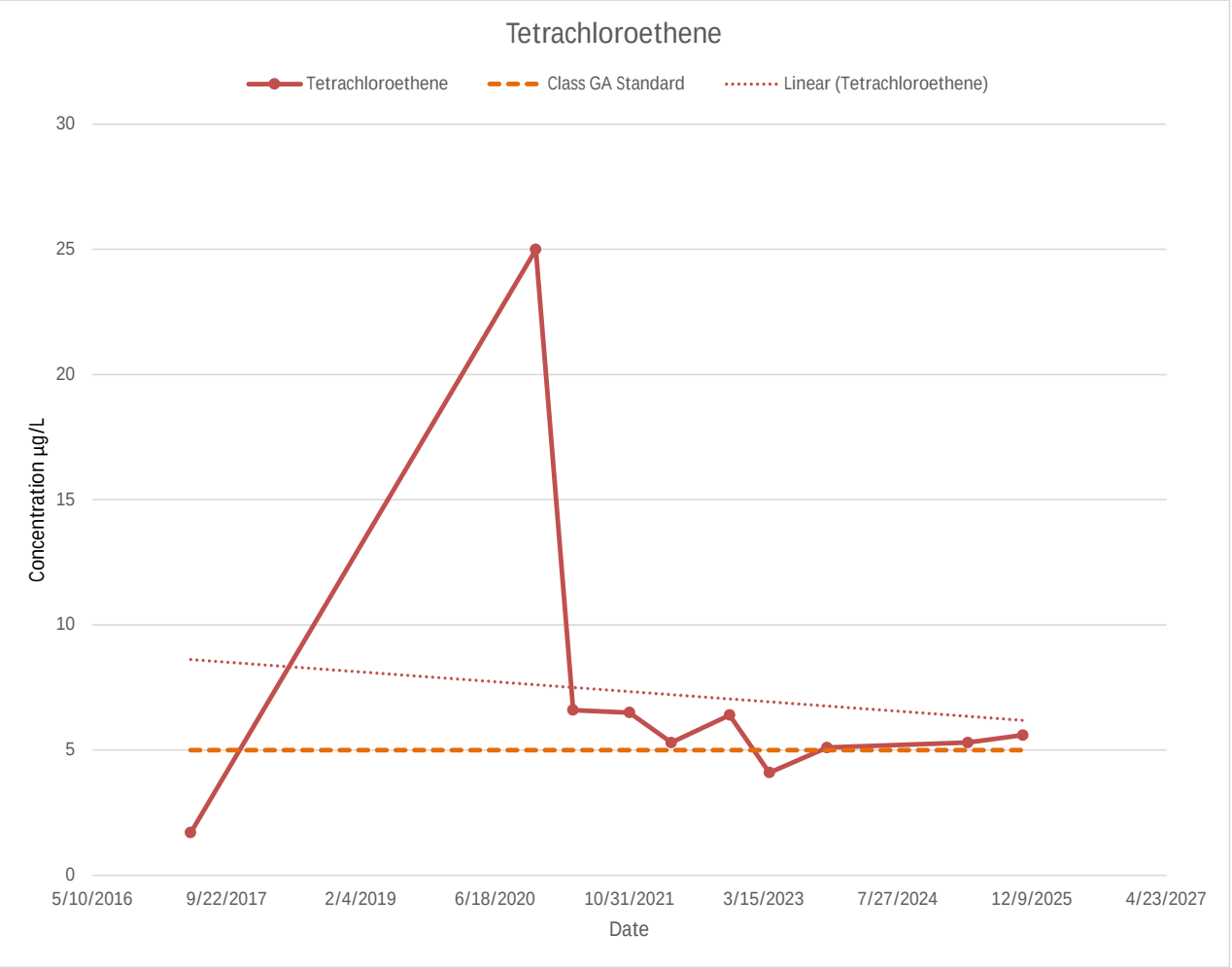
Table 18
MW-26S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



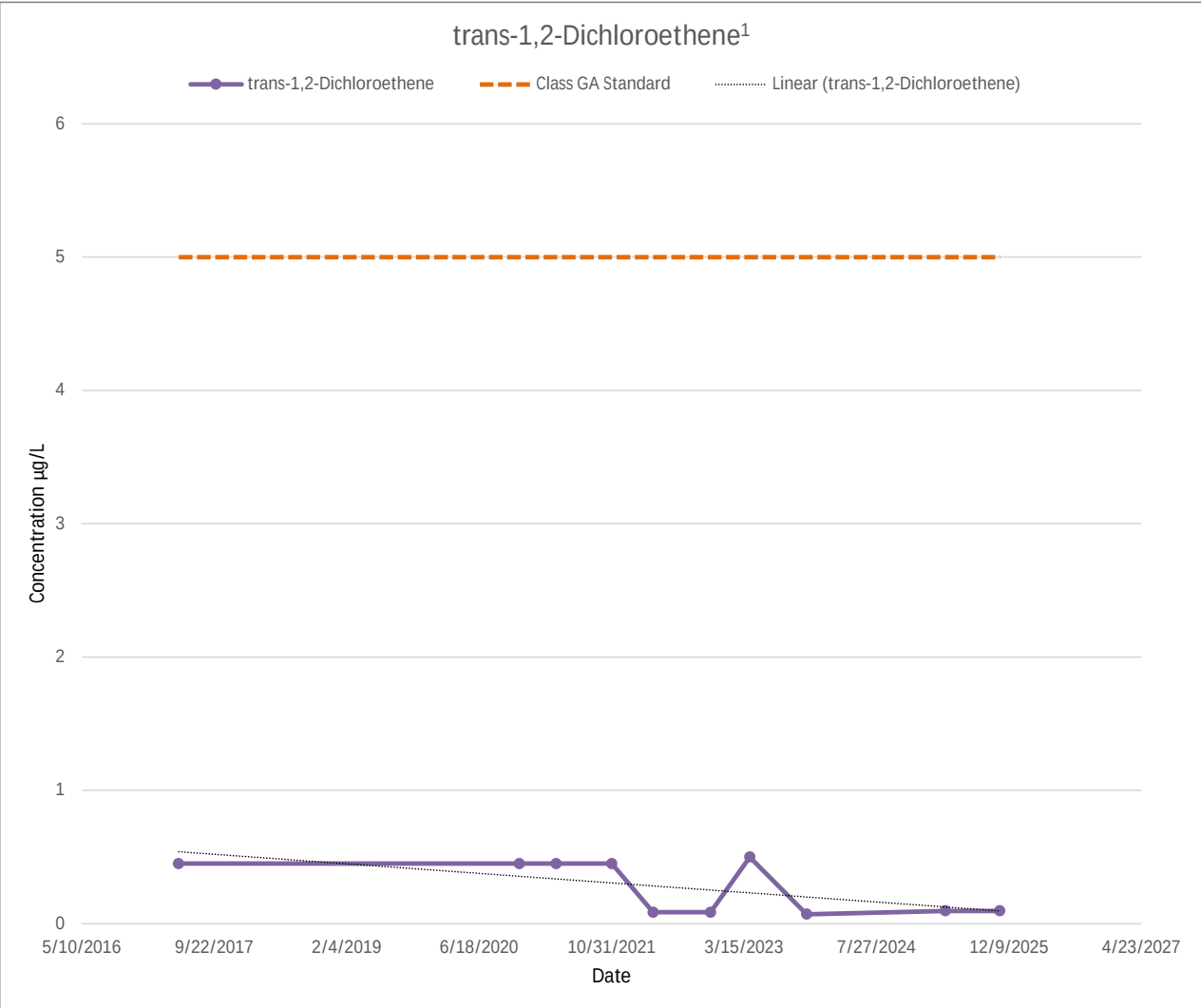
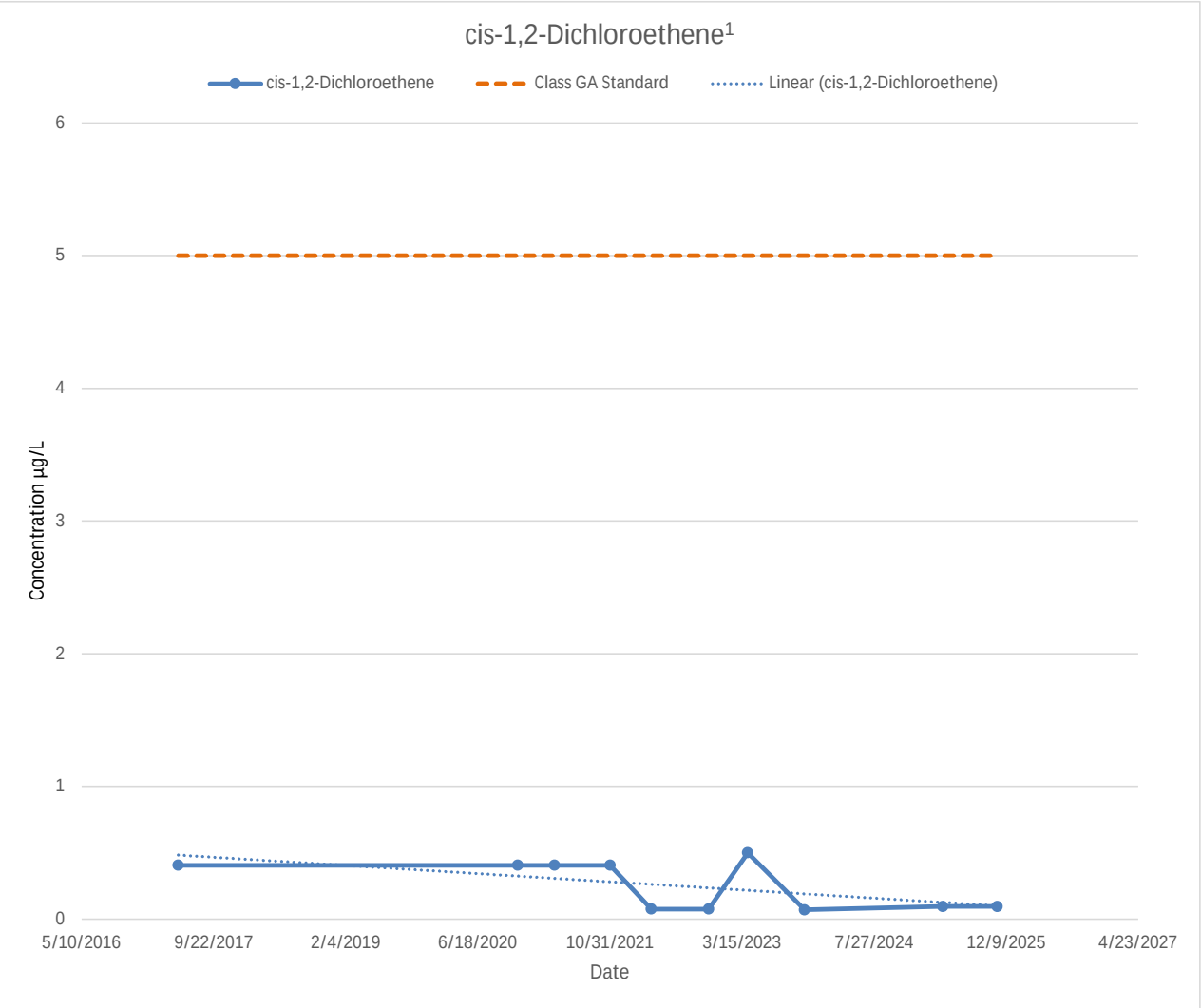
Table 19
MW-27S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



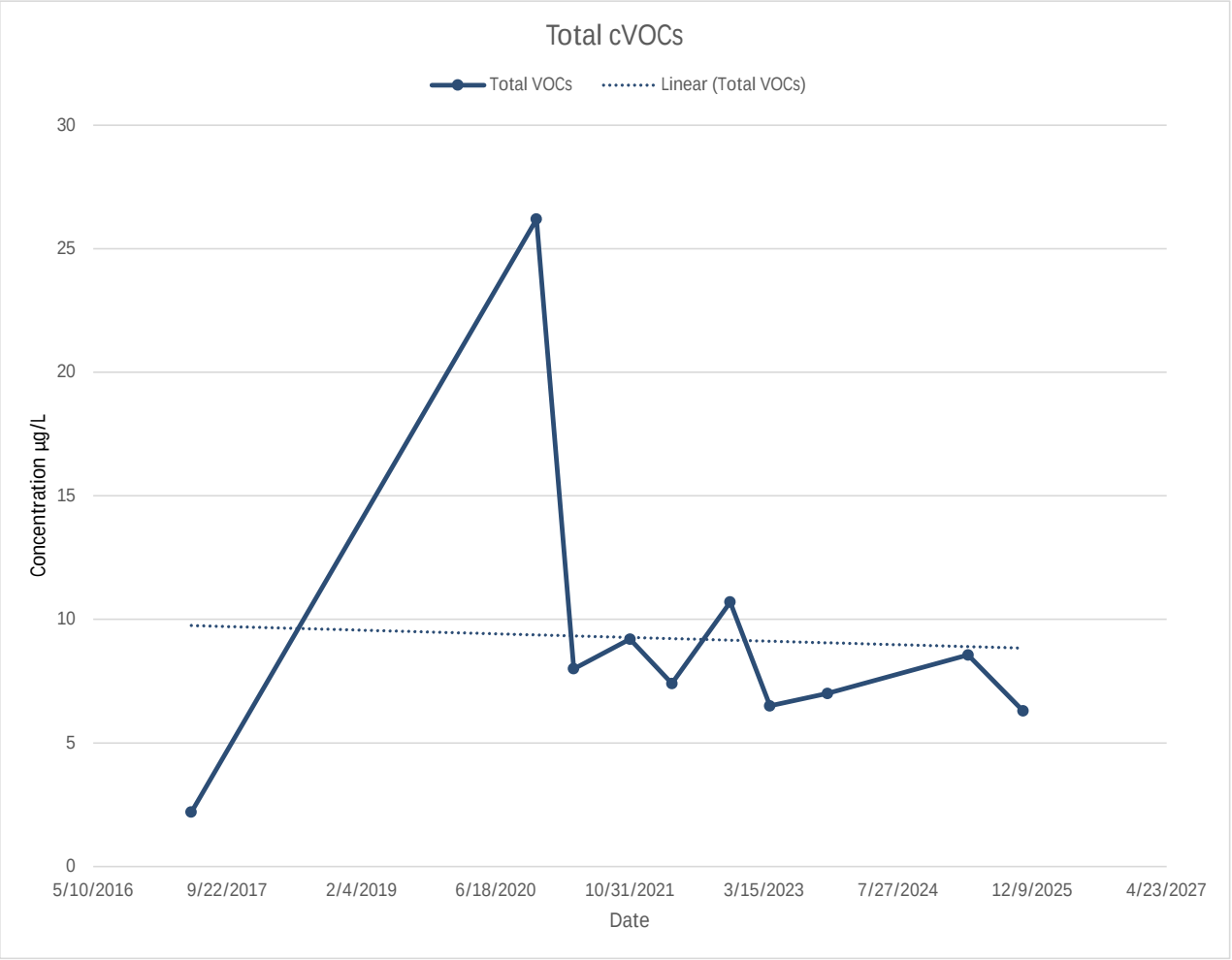
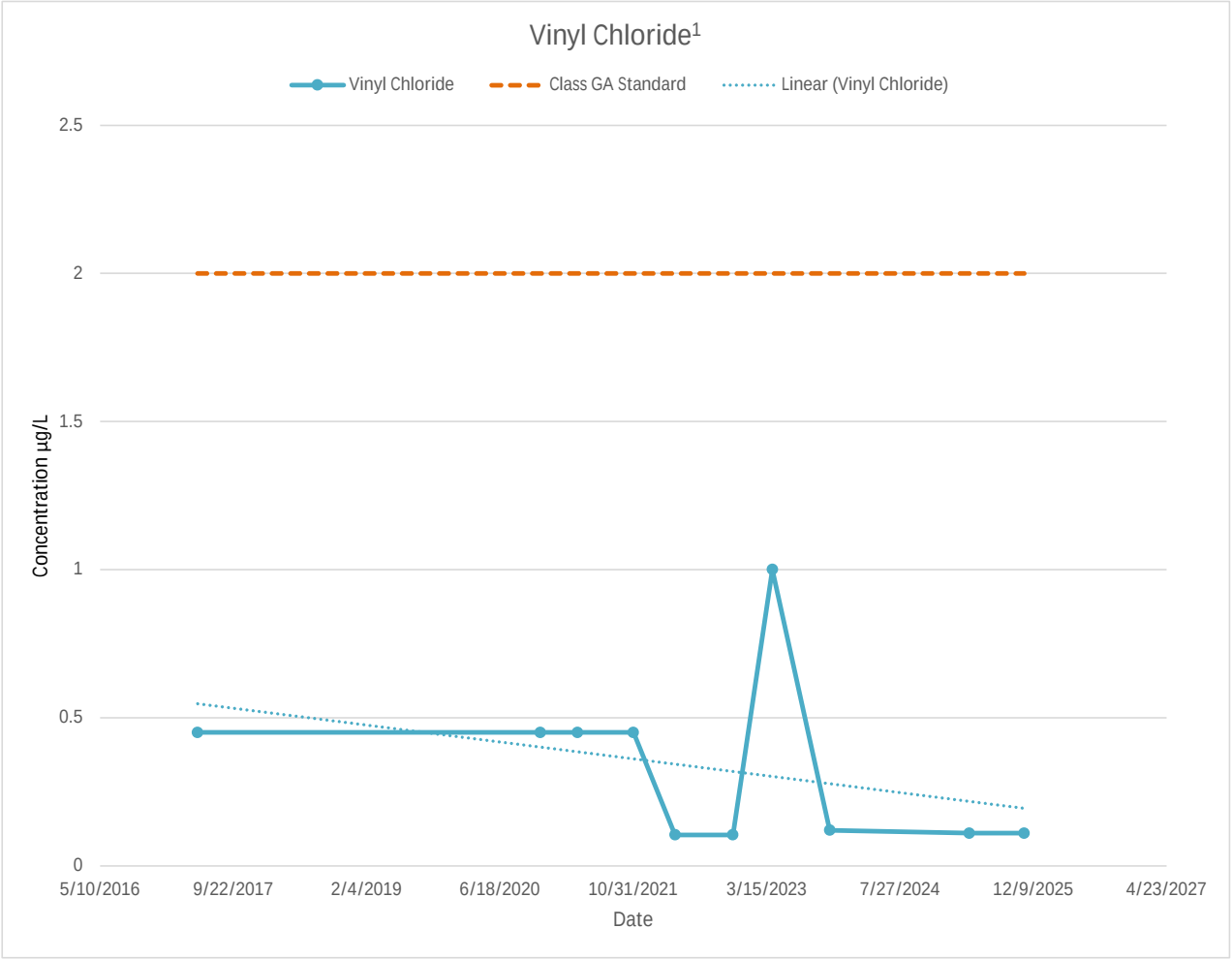
Table 19
MW-27S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



Table 19
MW-27S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



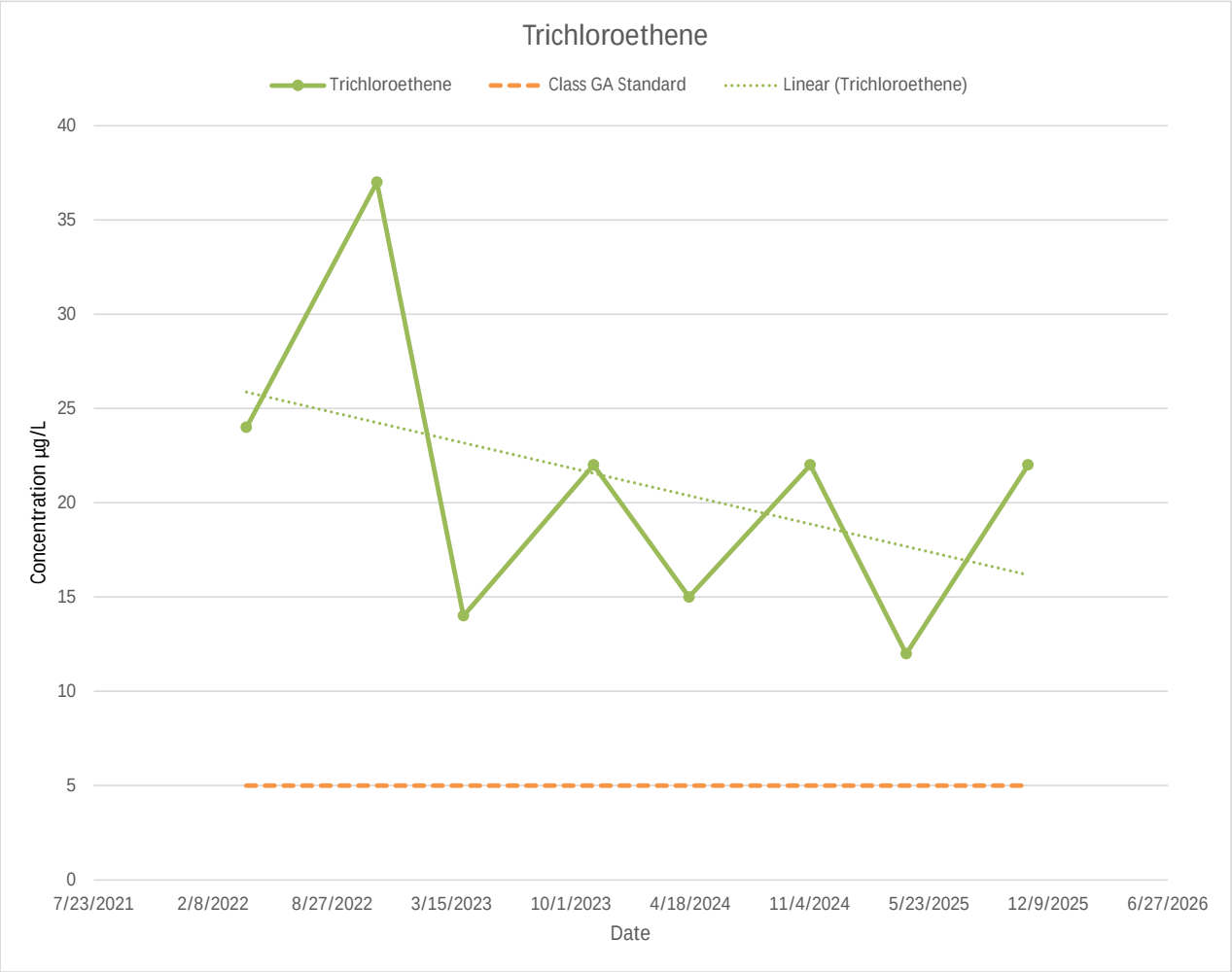
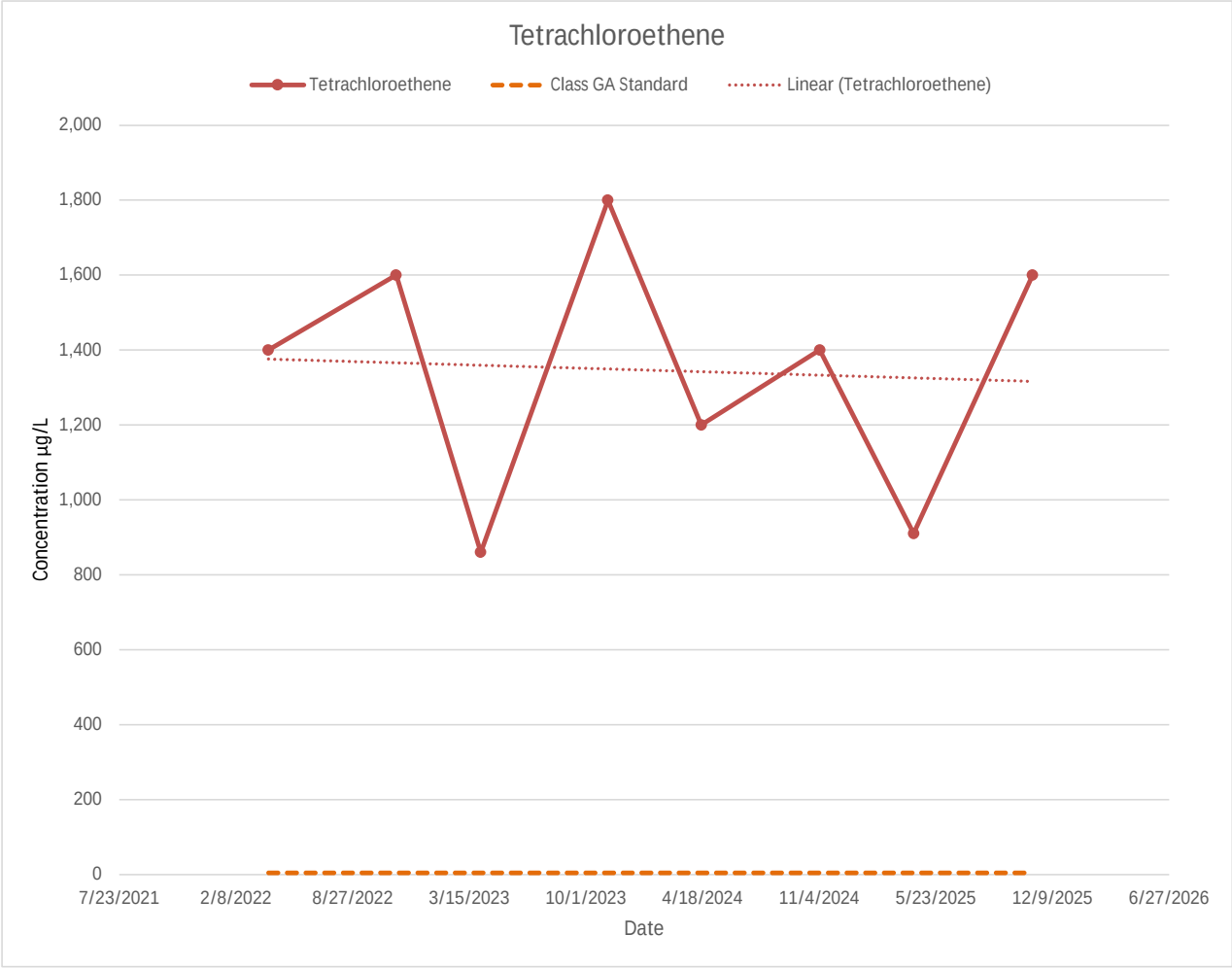
1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.

Appendix B – Recent (April 2022 through November 2025) Groundwater Data Trends





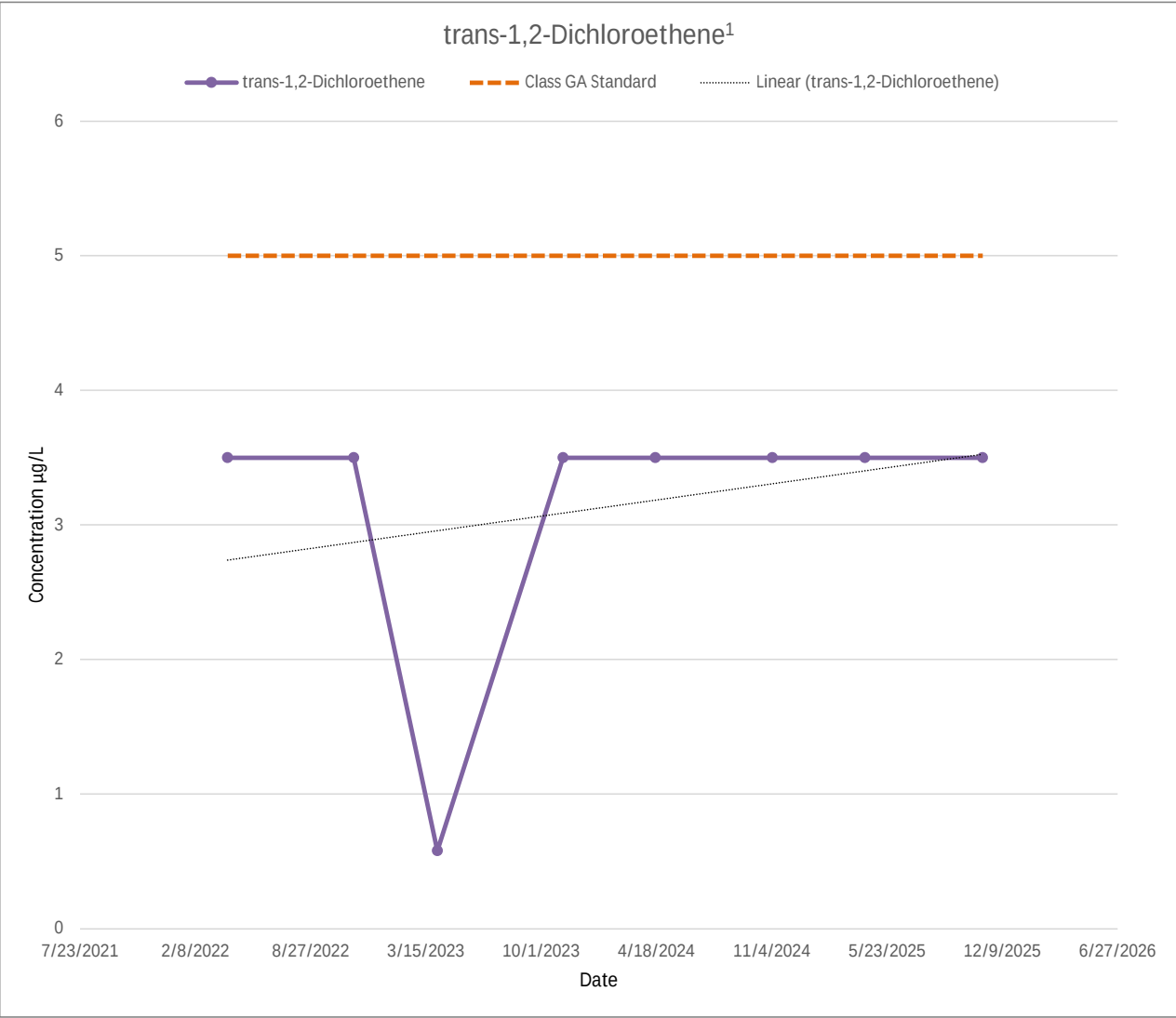
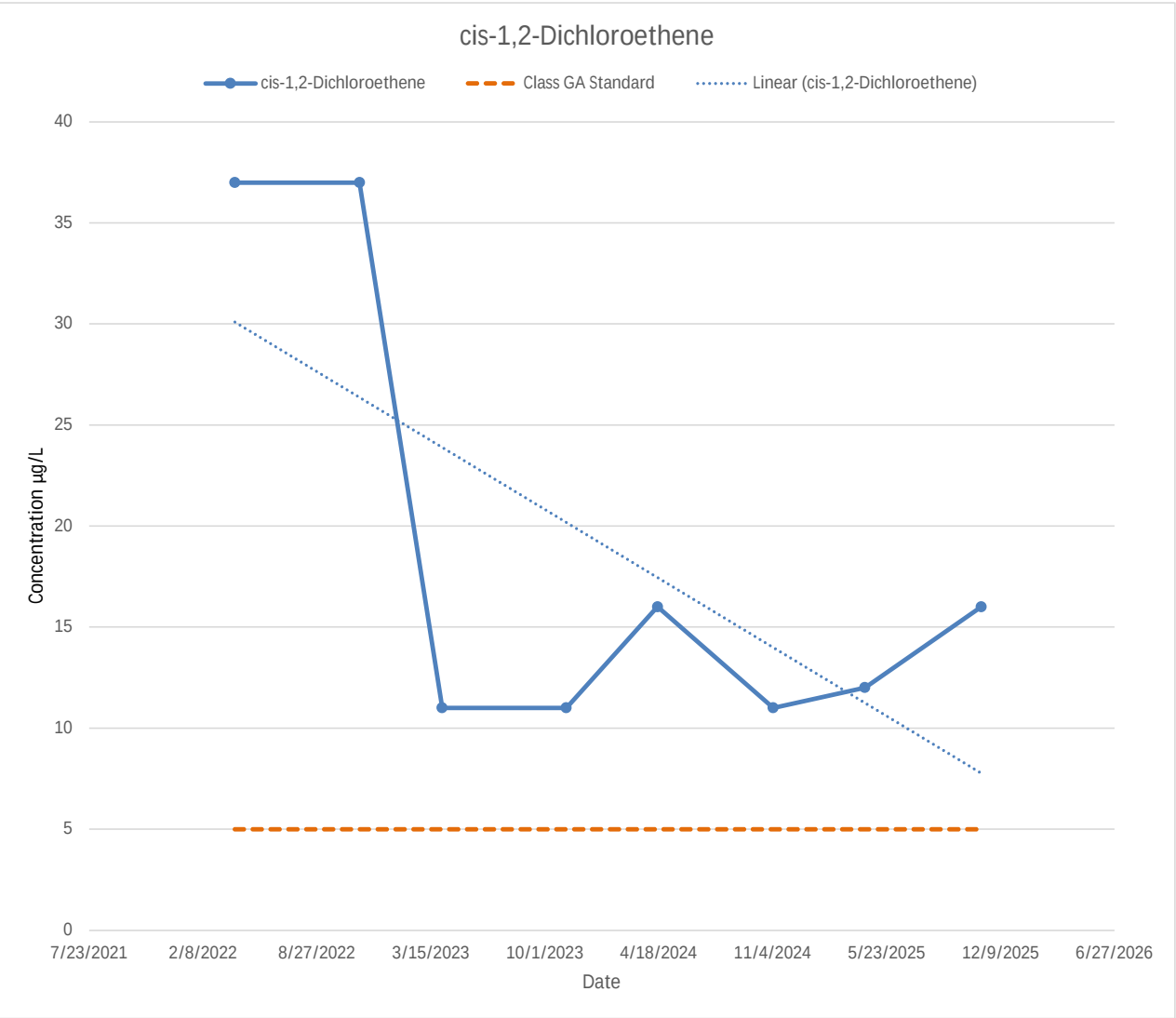
Table 5
PZ-4R Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



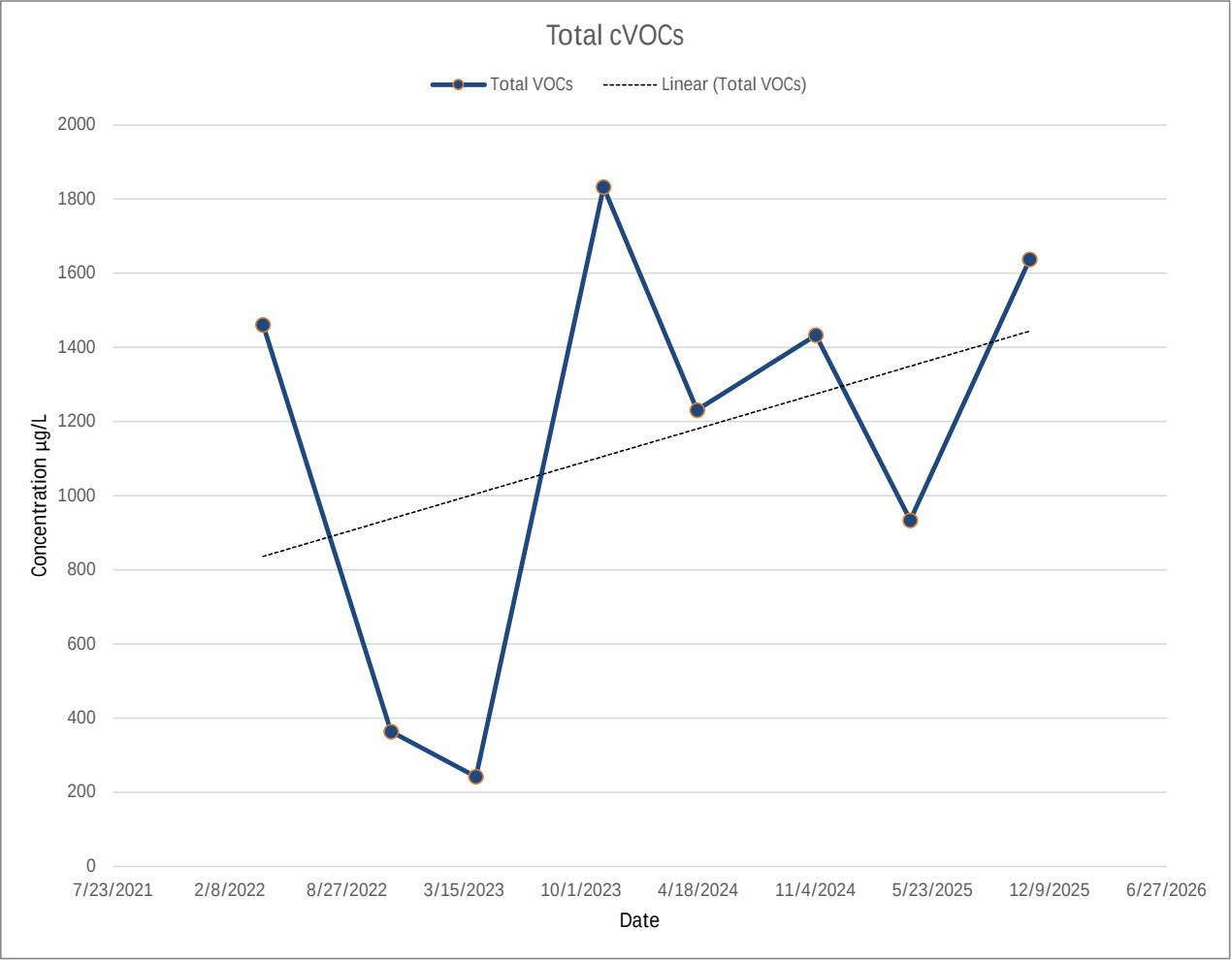
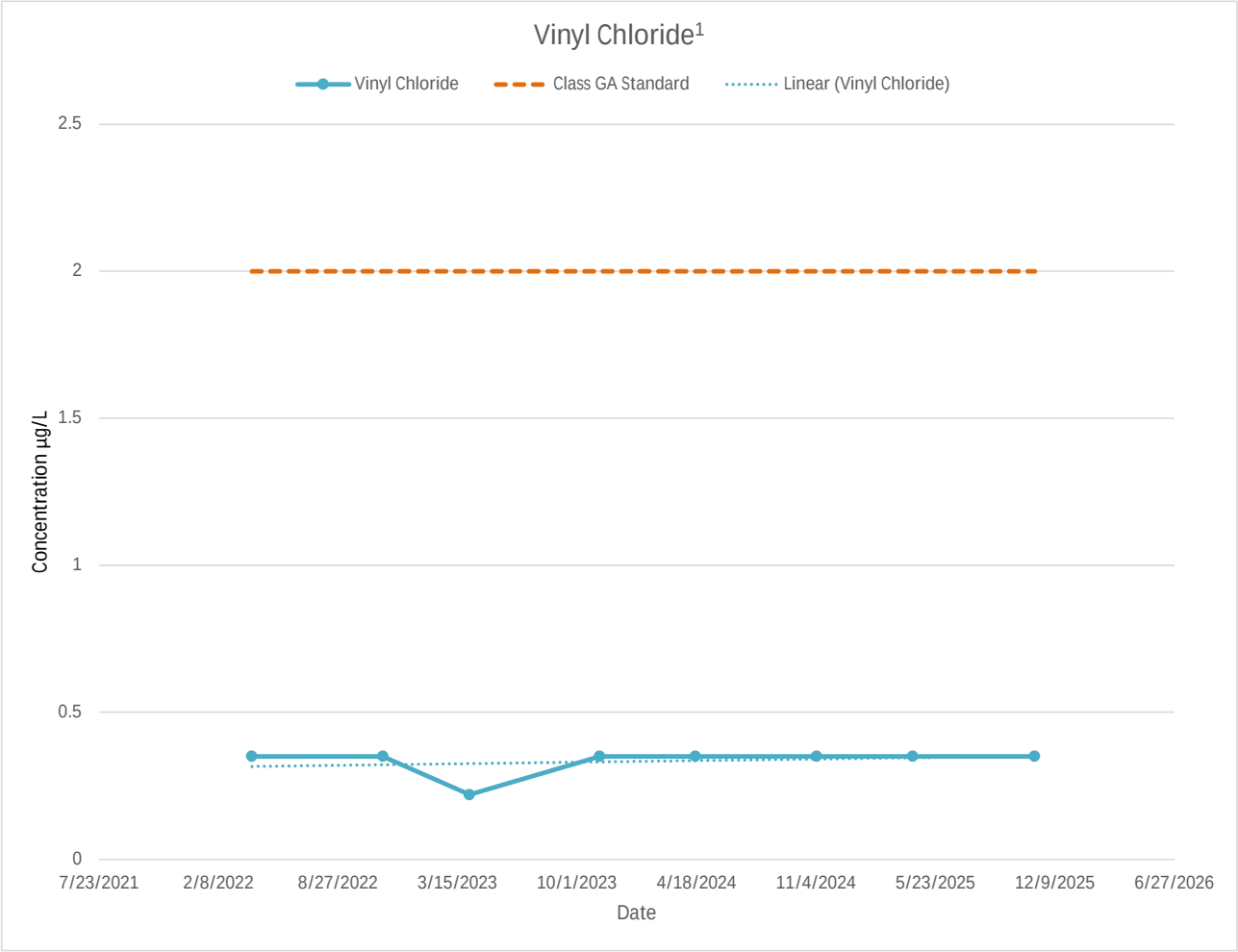
Table 5
PZ-4R Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



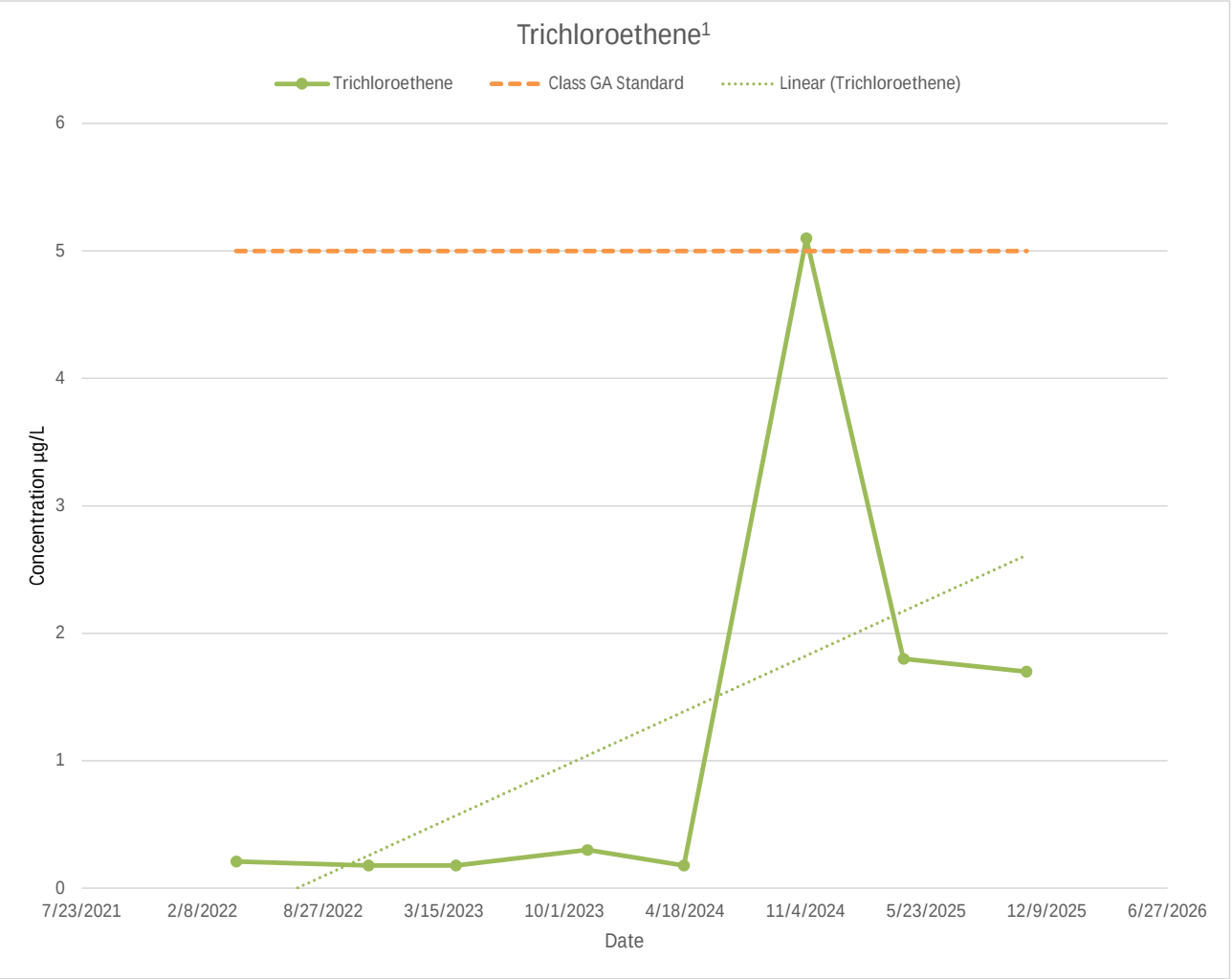
Table 5
PZ-4R Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



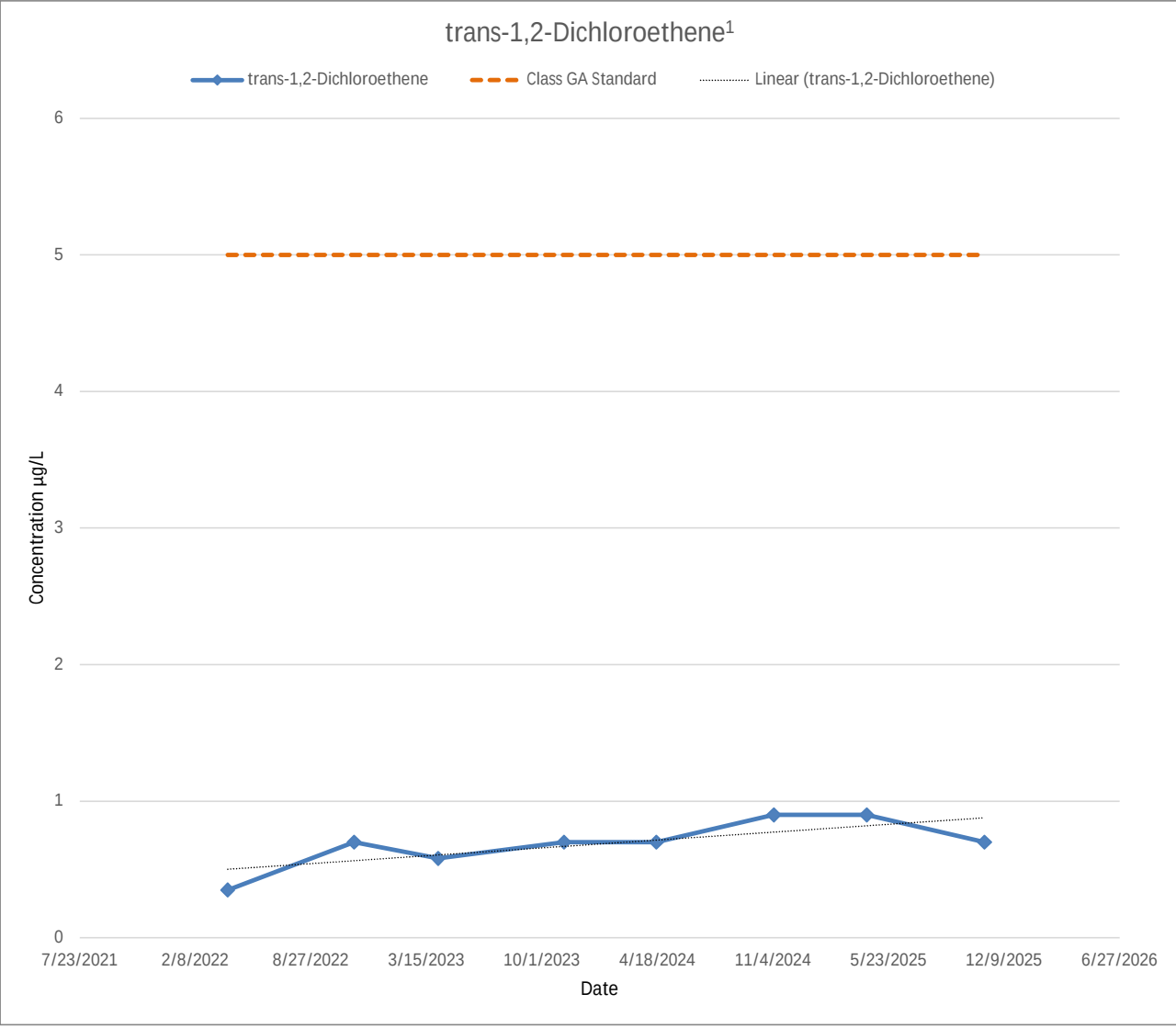
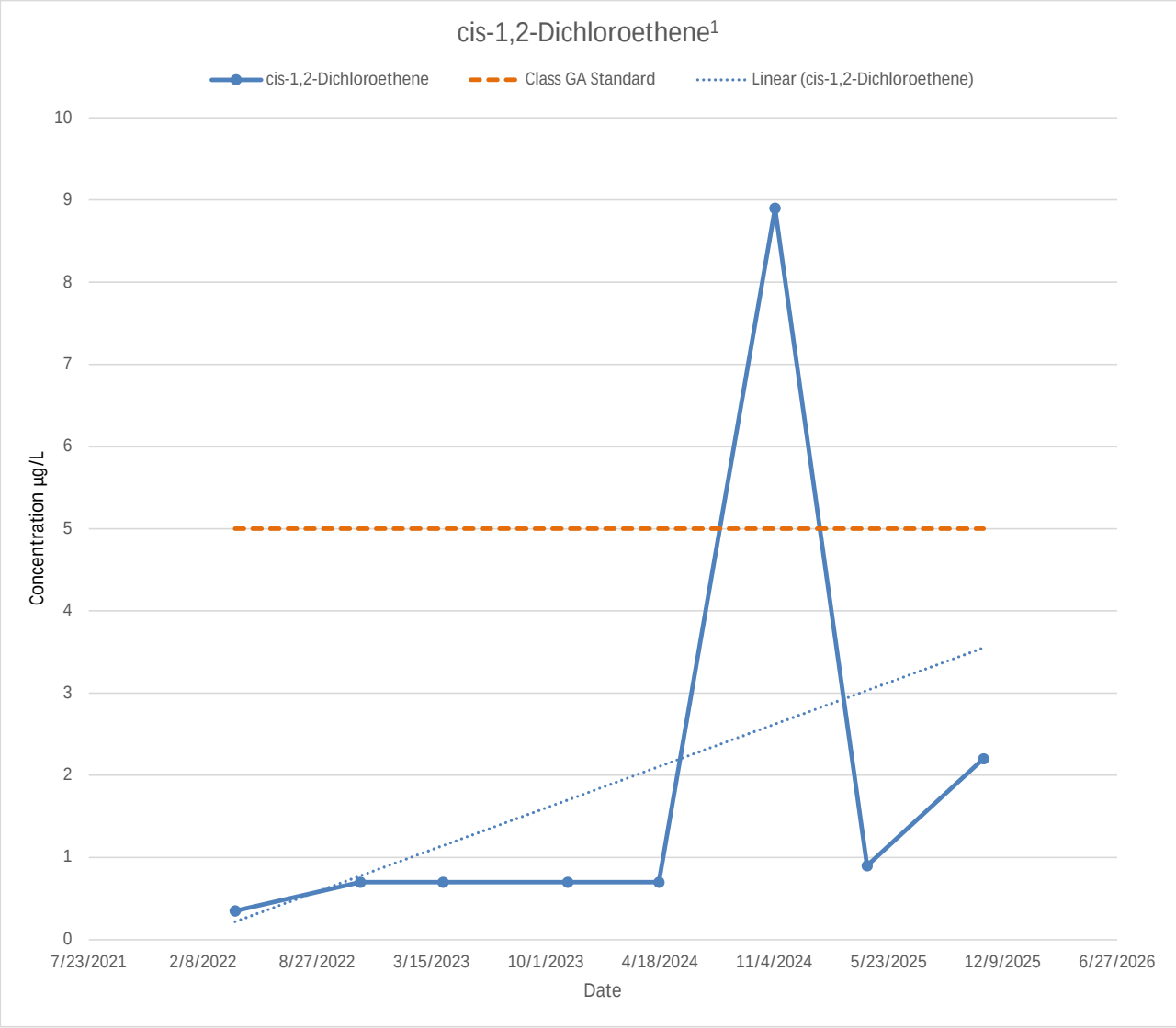
Table 6
PZ-5 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



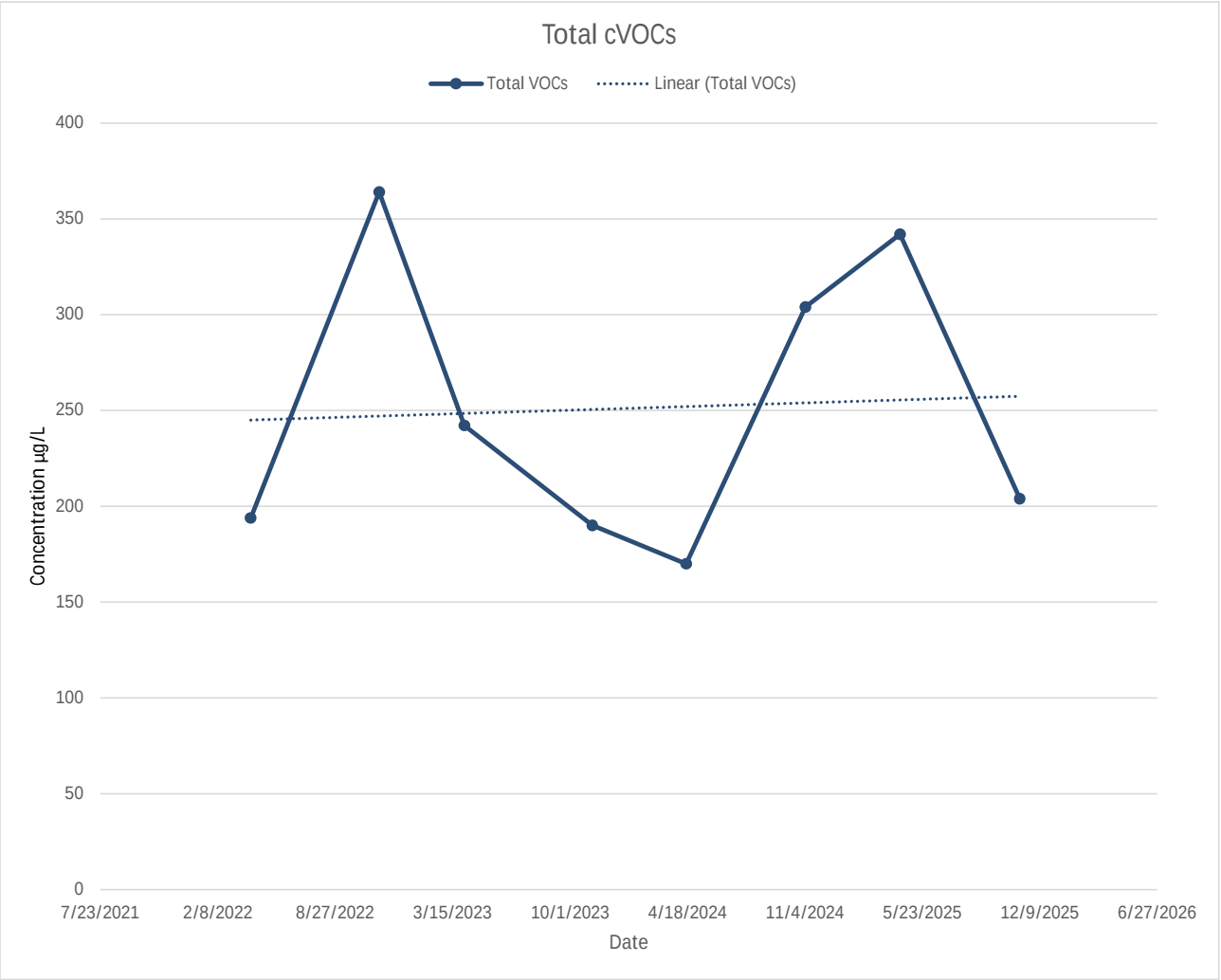
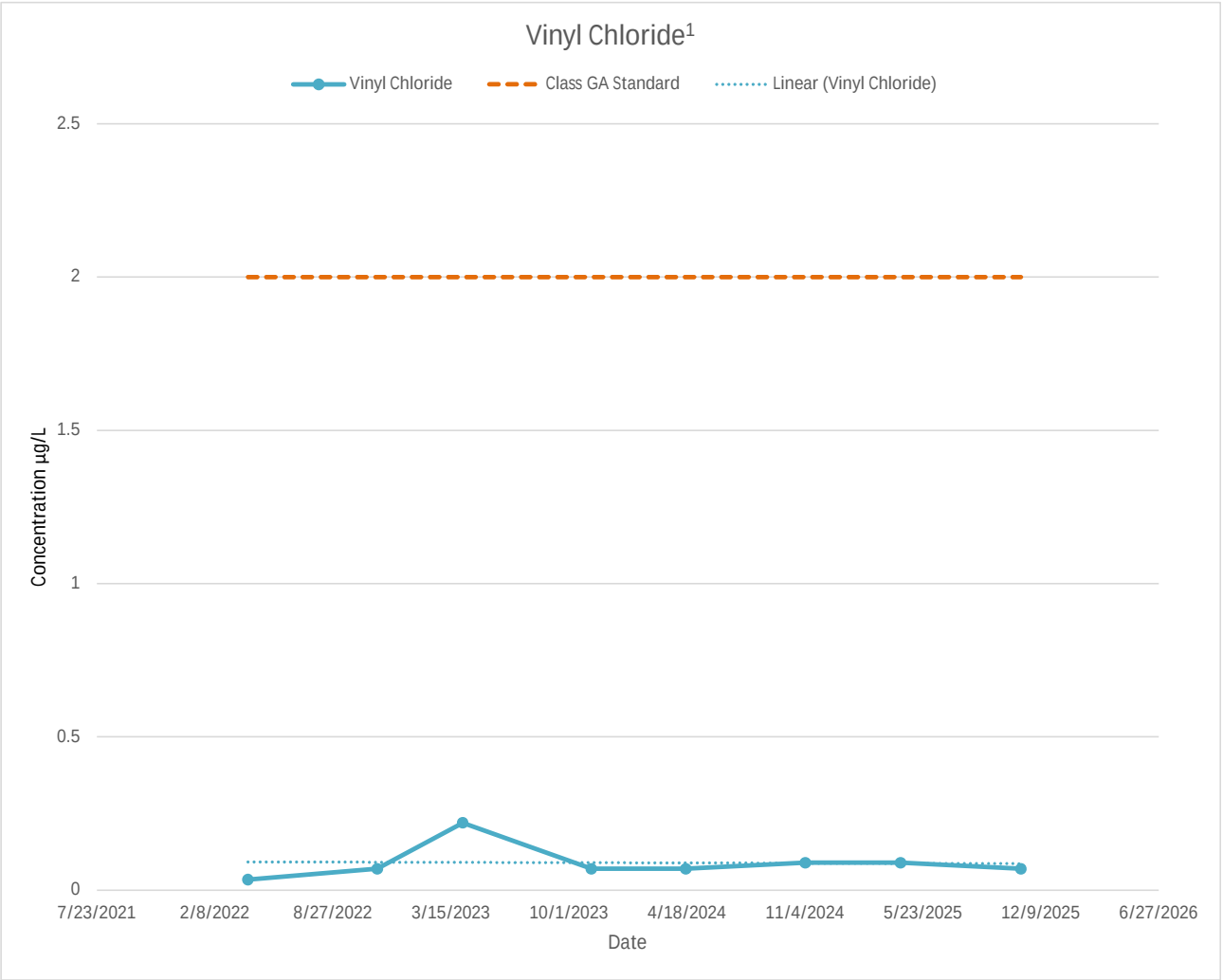
Table 6
PZ-5 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



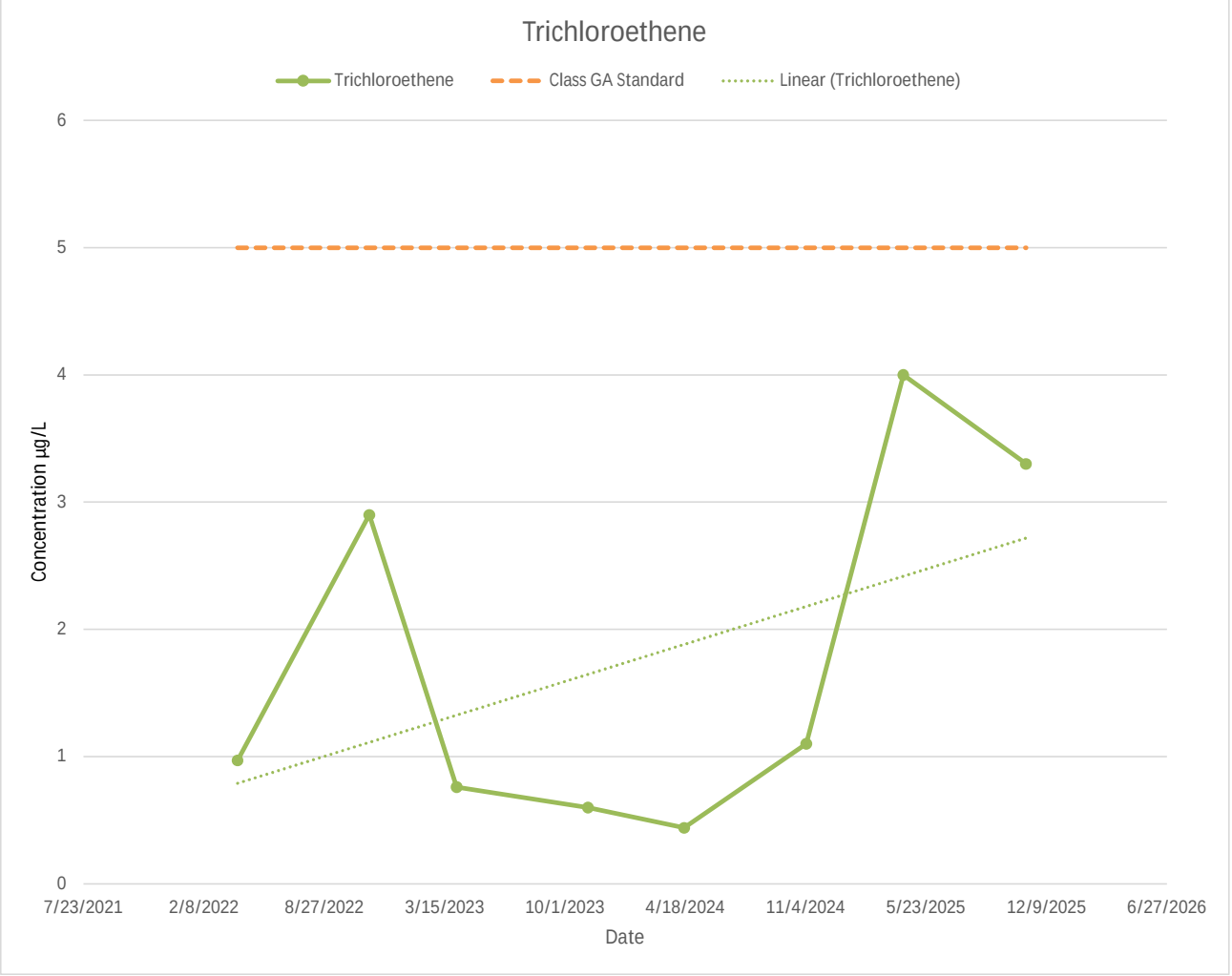
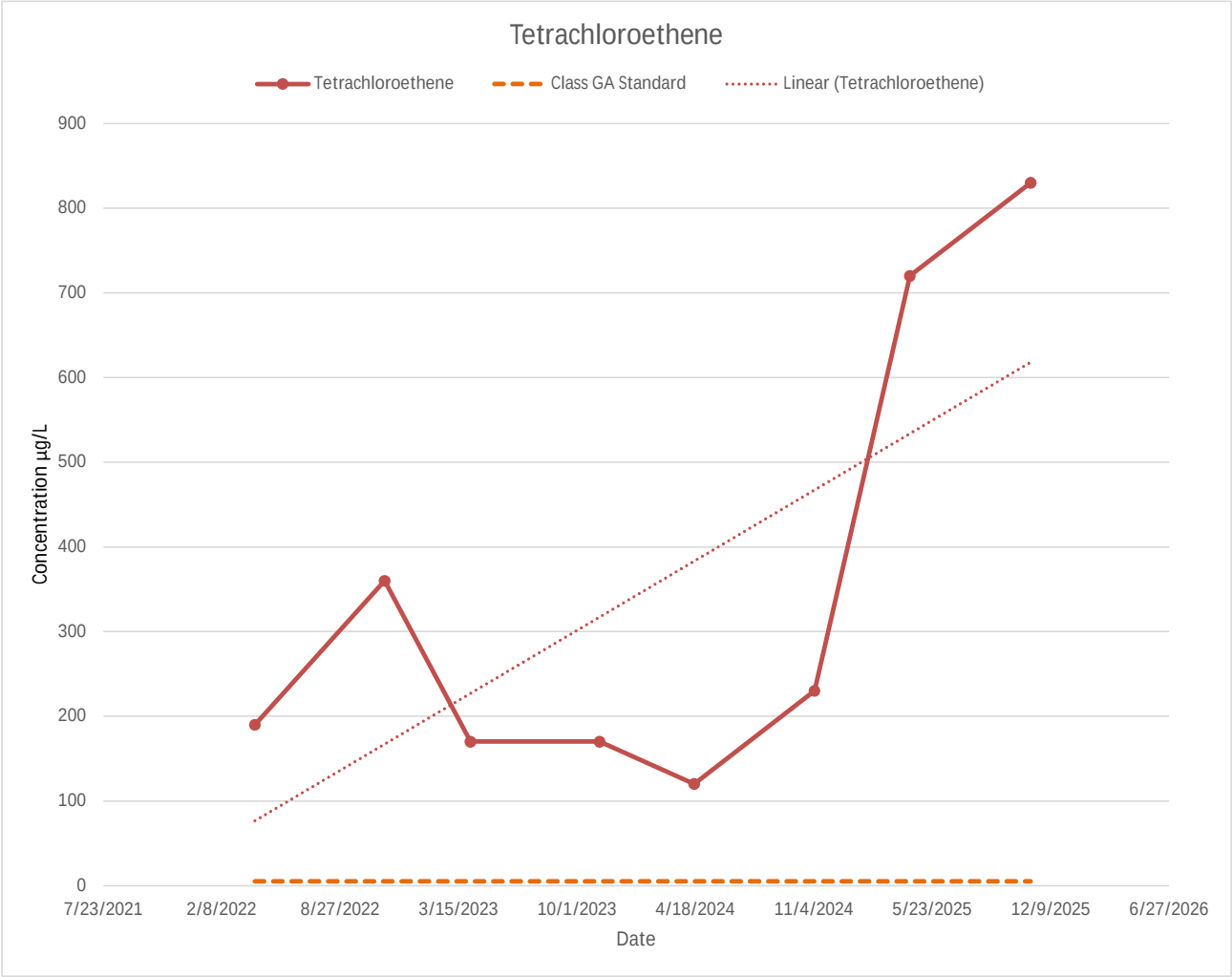
Table 6
PZ-5 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



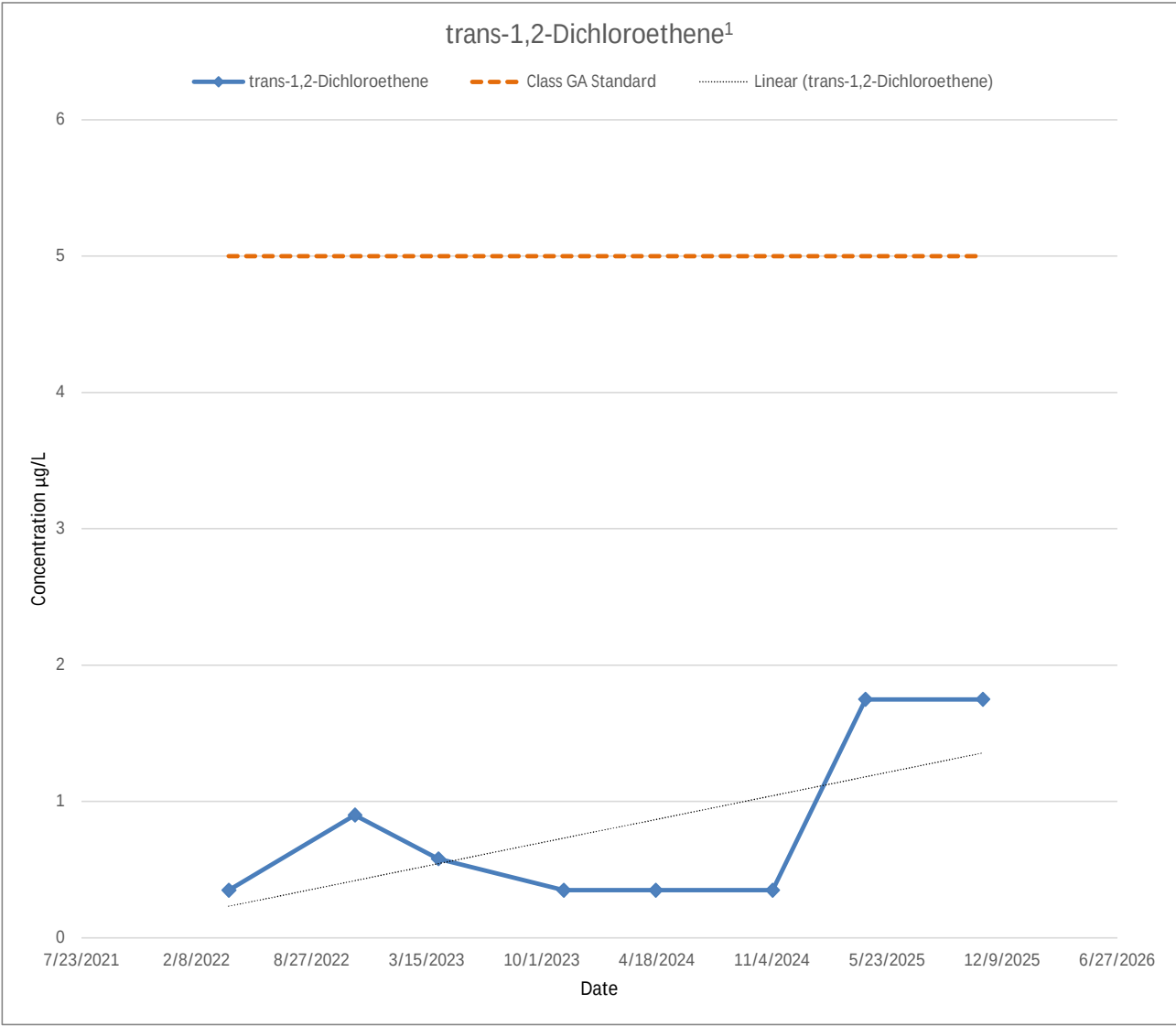
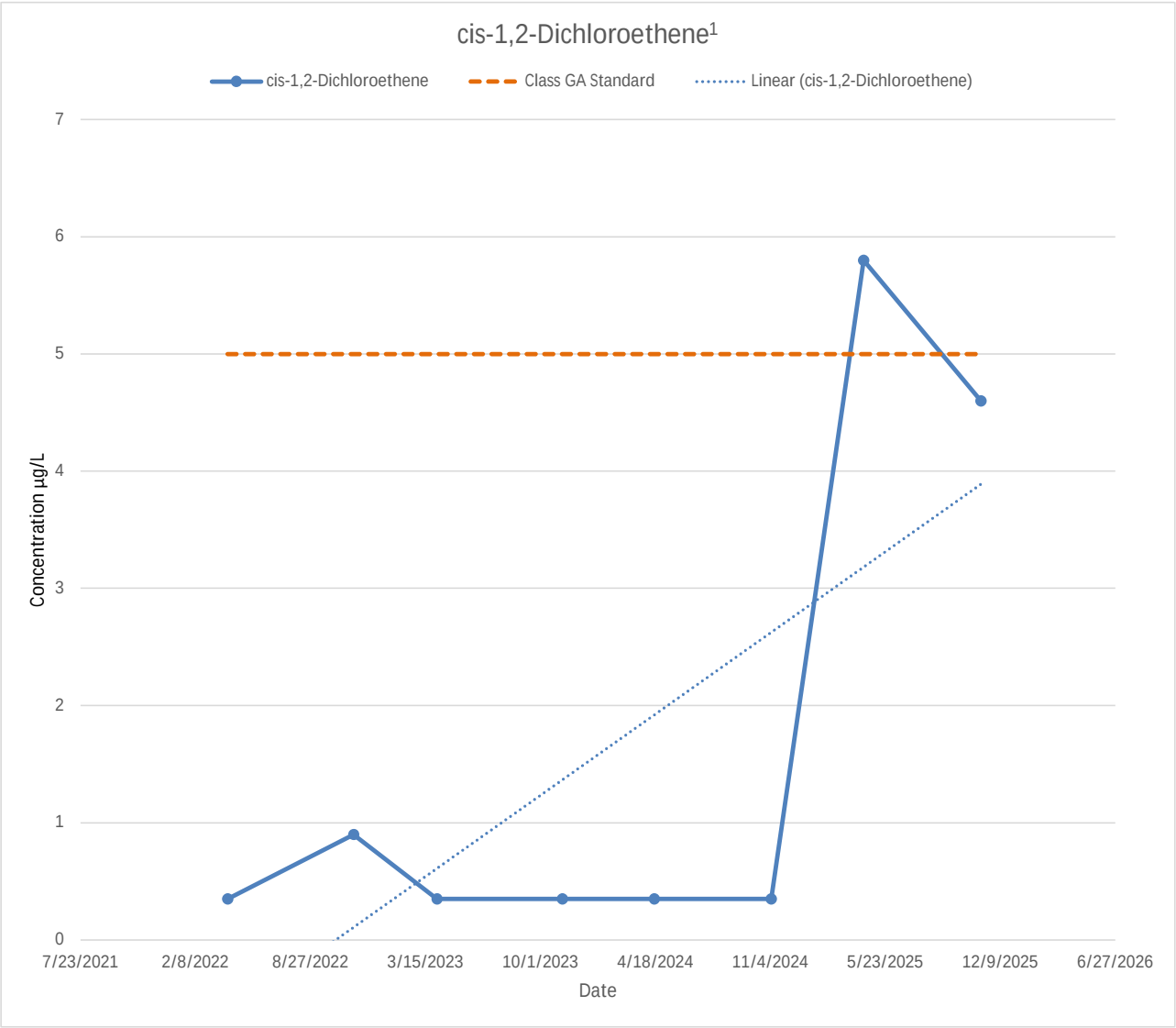
Table 7
PZ-6 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



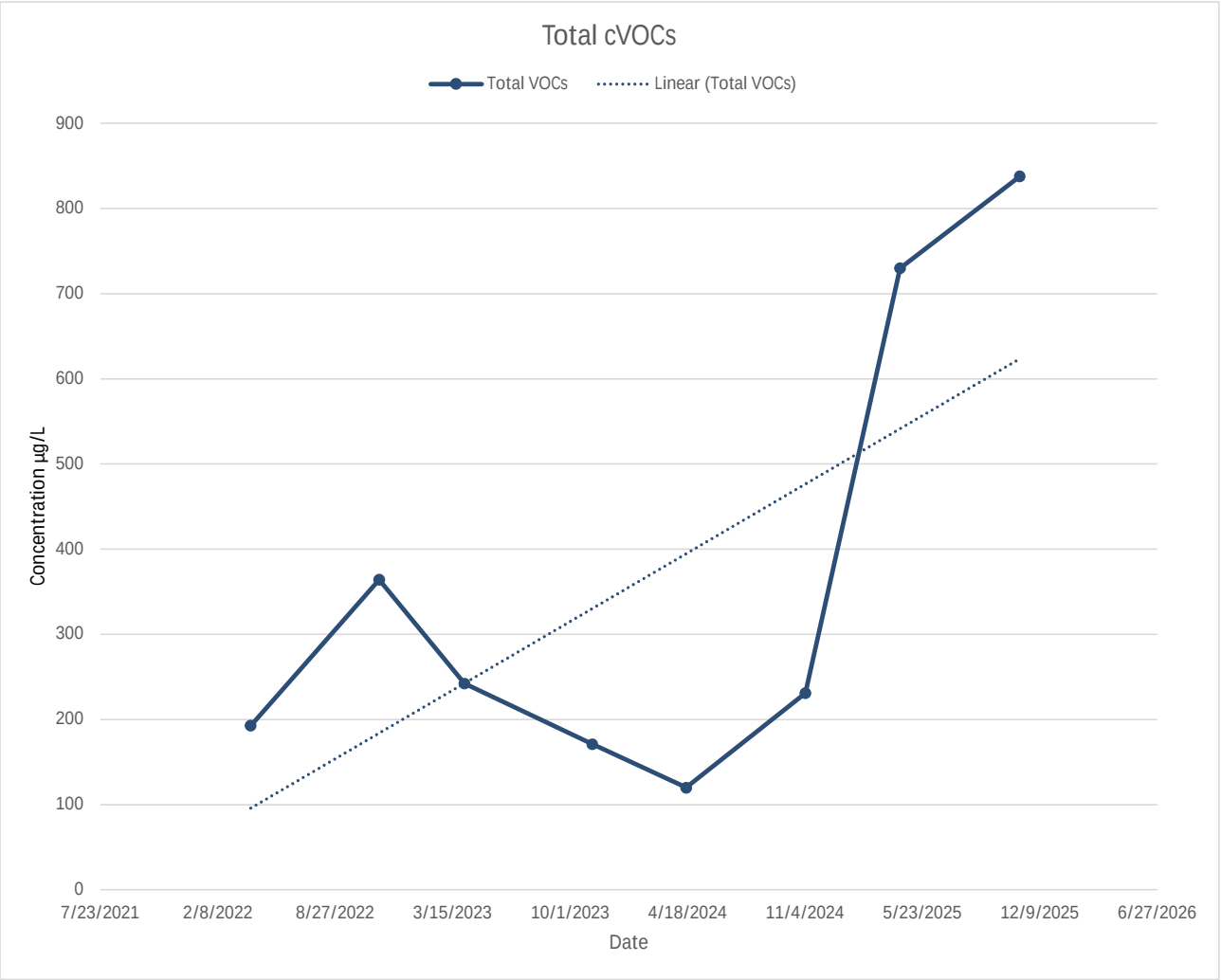
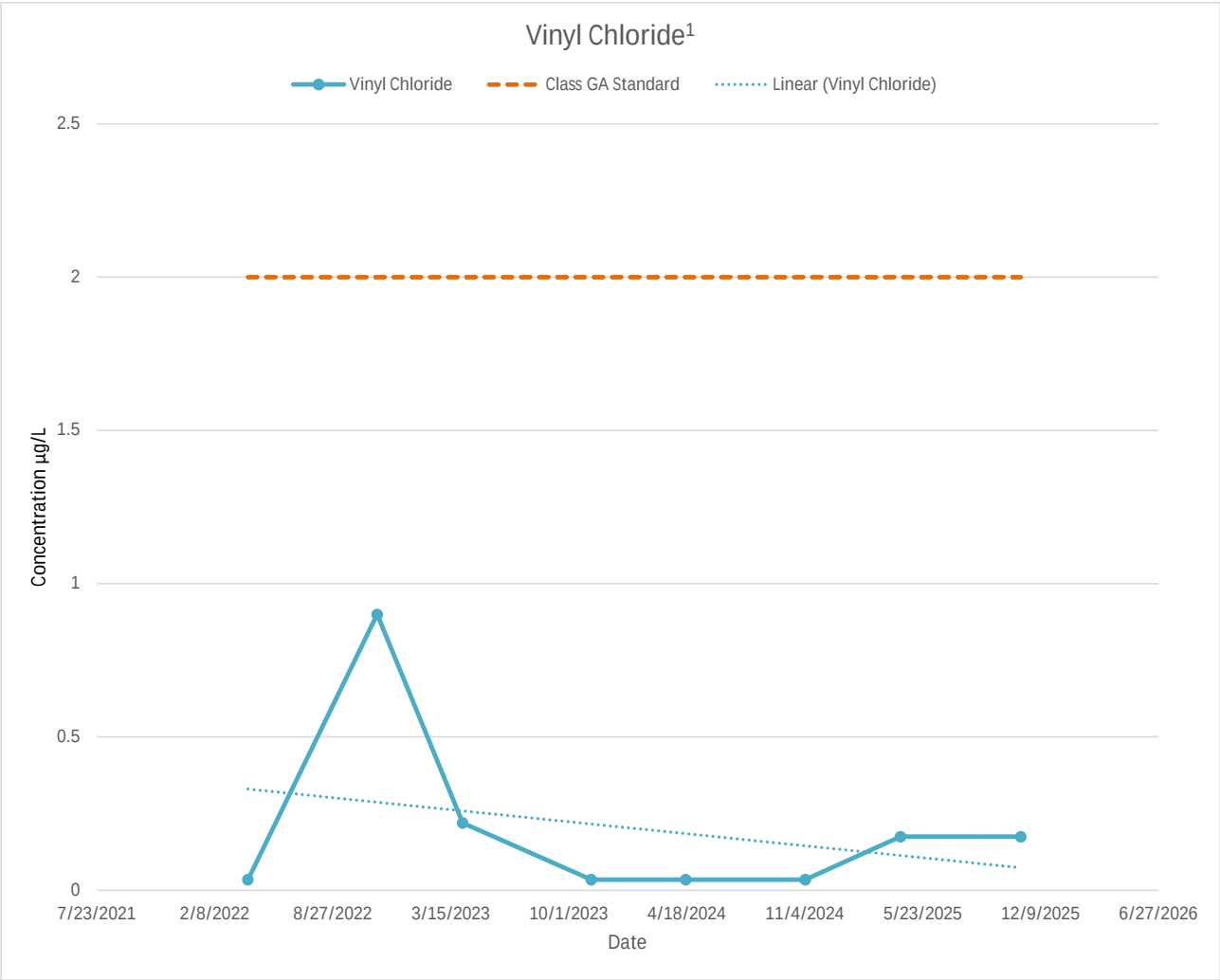
Table 7
PZ-6 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



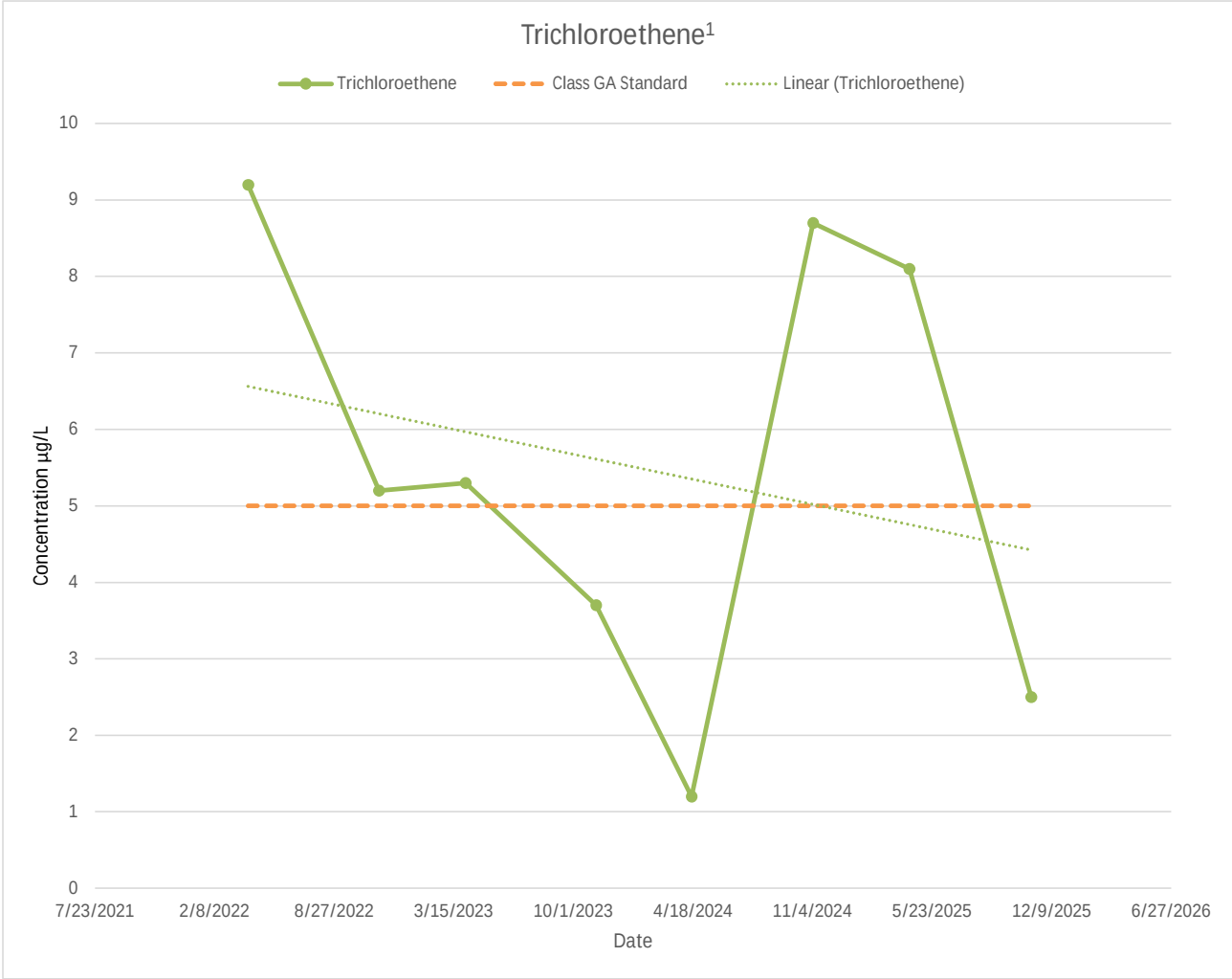
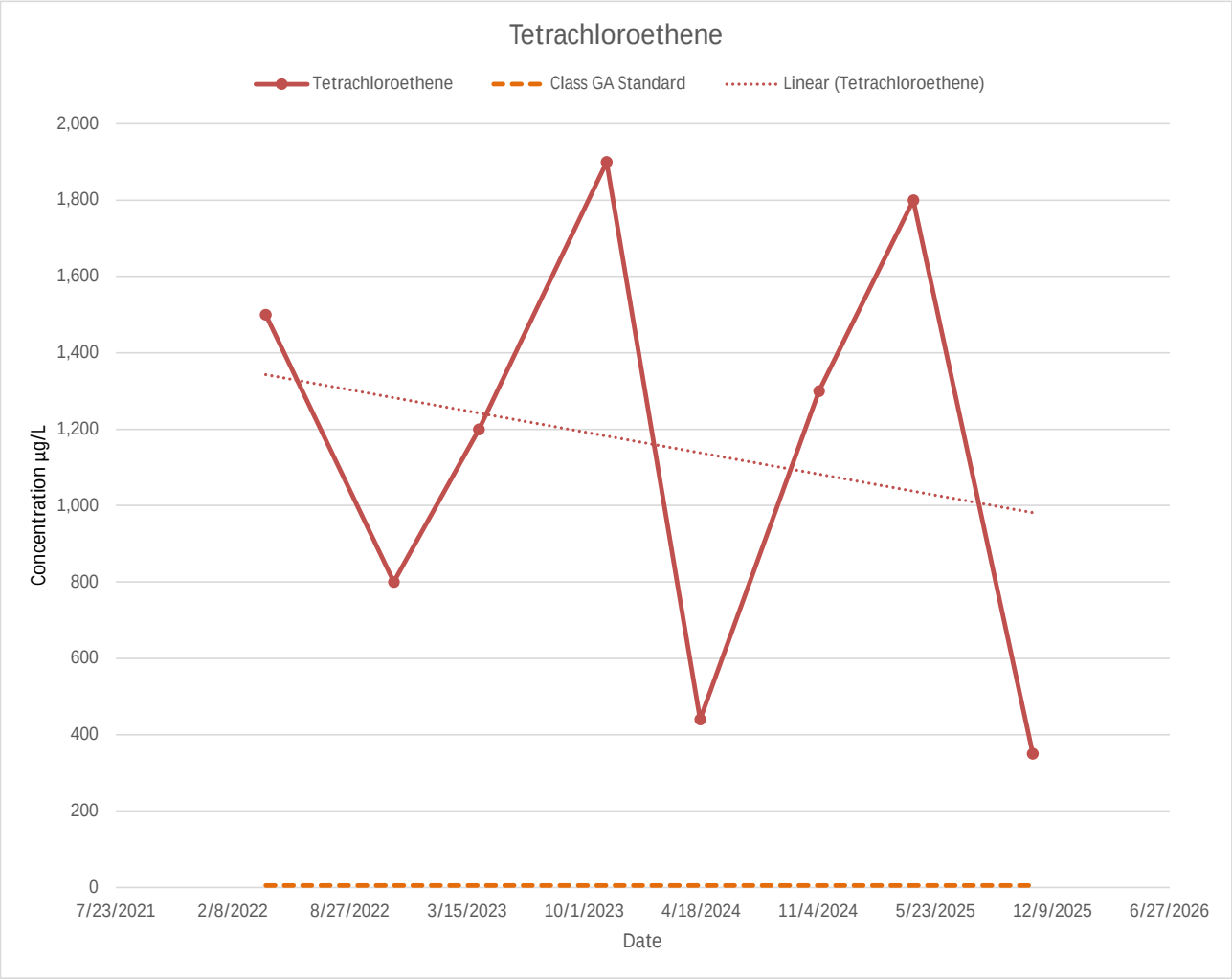
Table 7
PZ-6 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



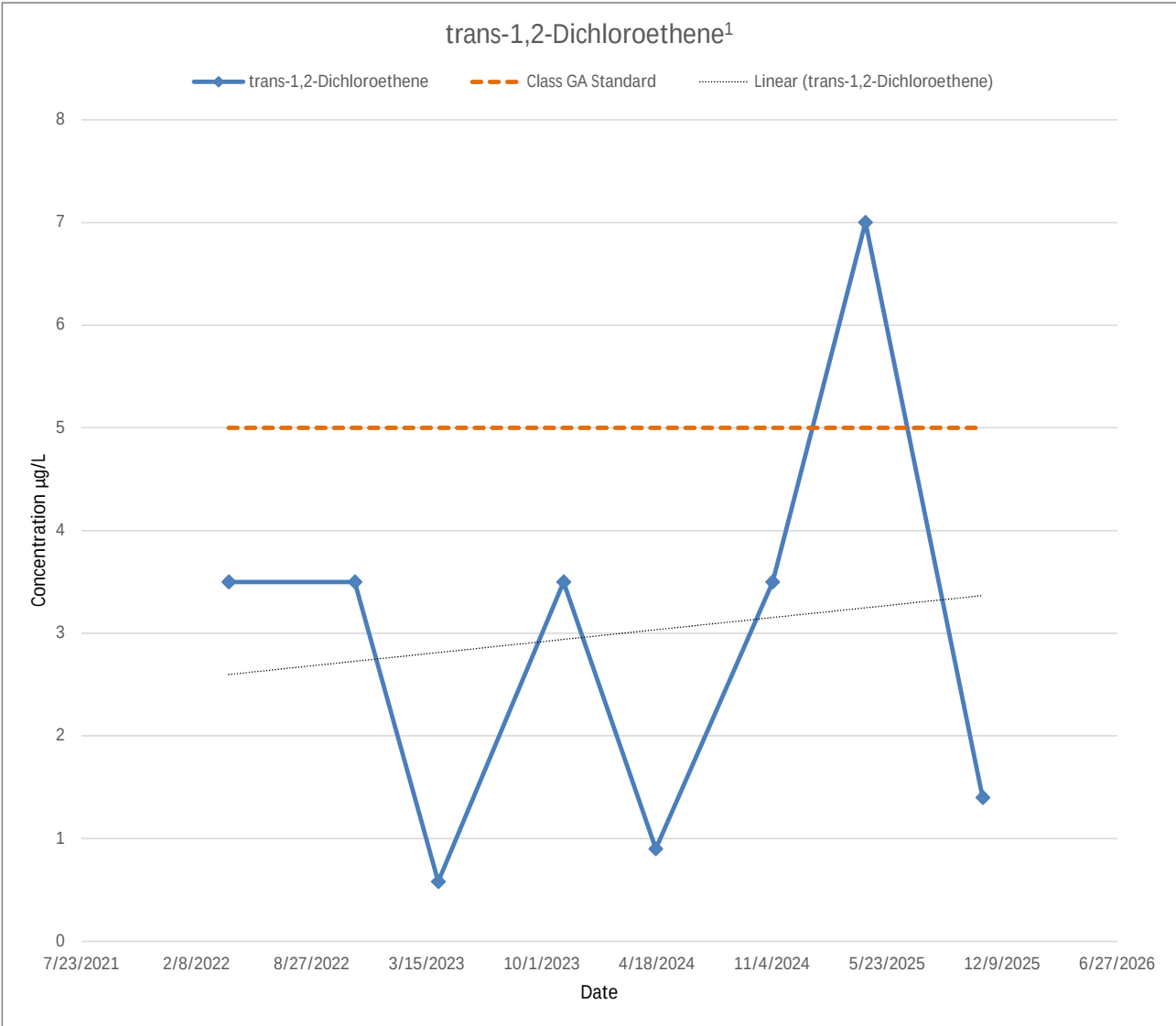
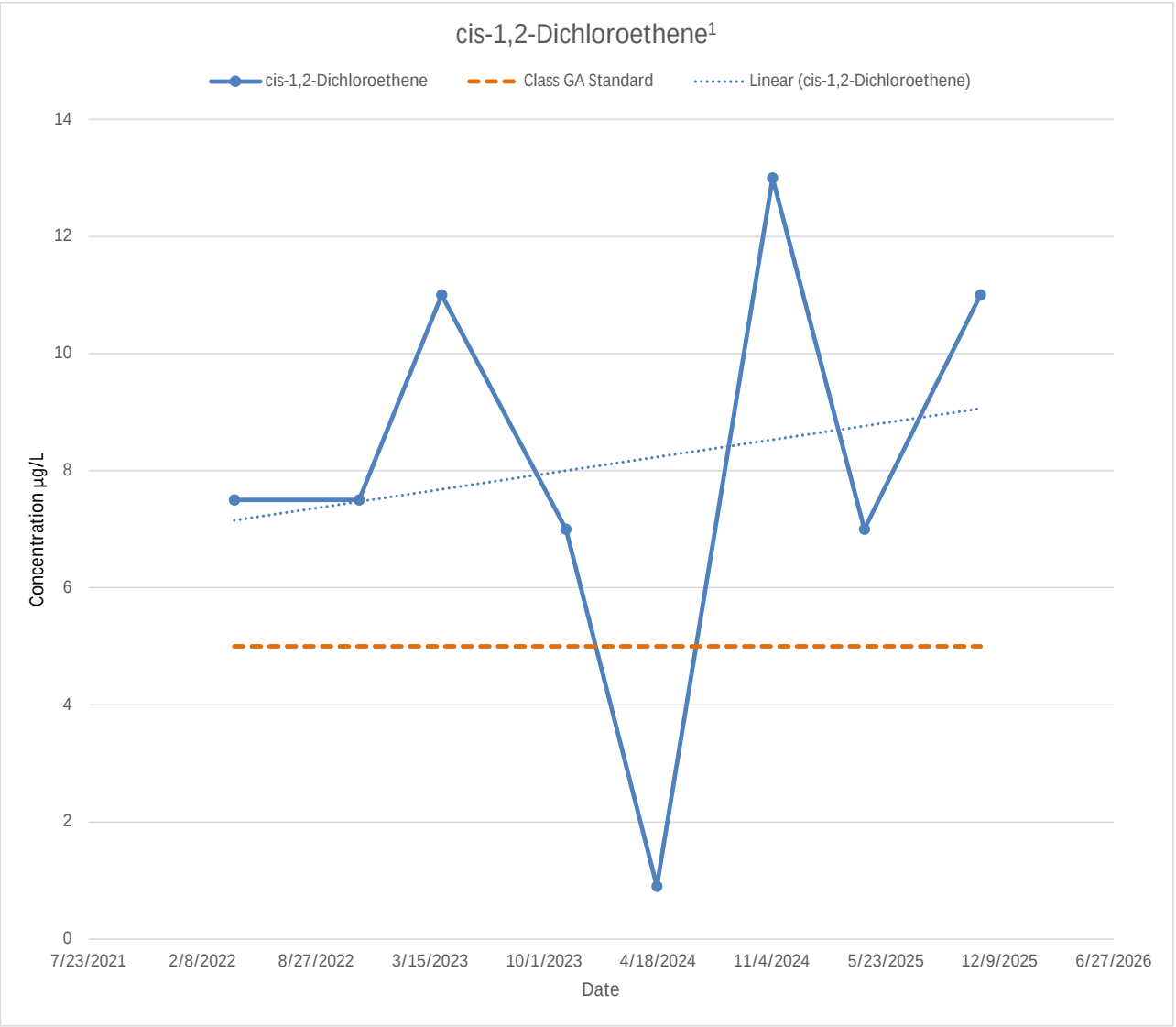
Table 8
PZ-11 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



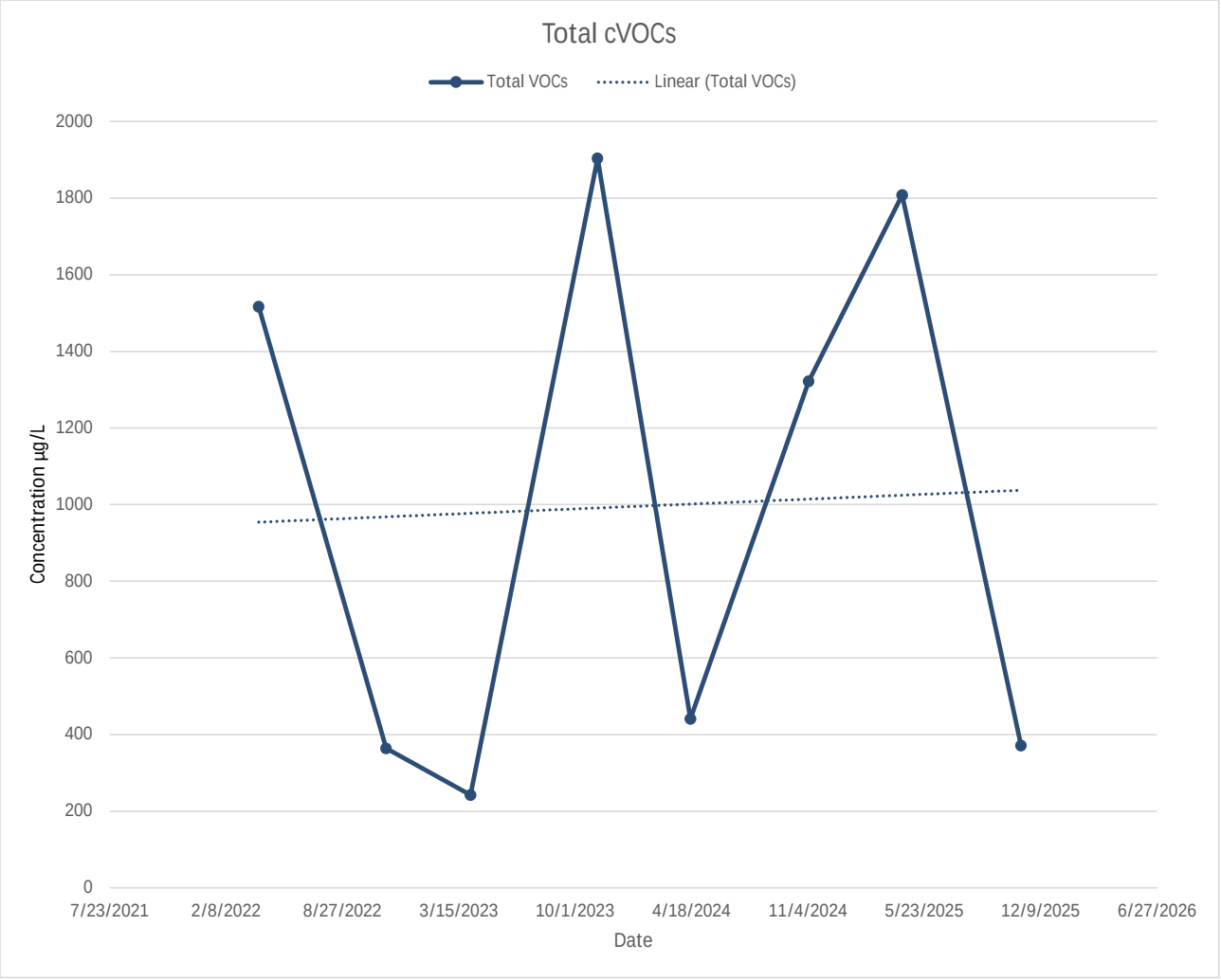
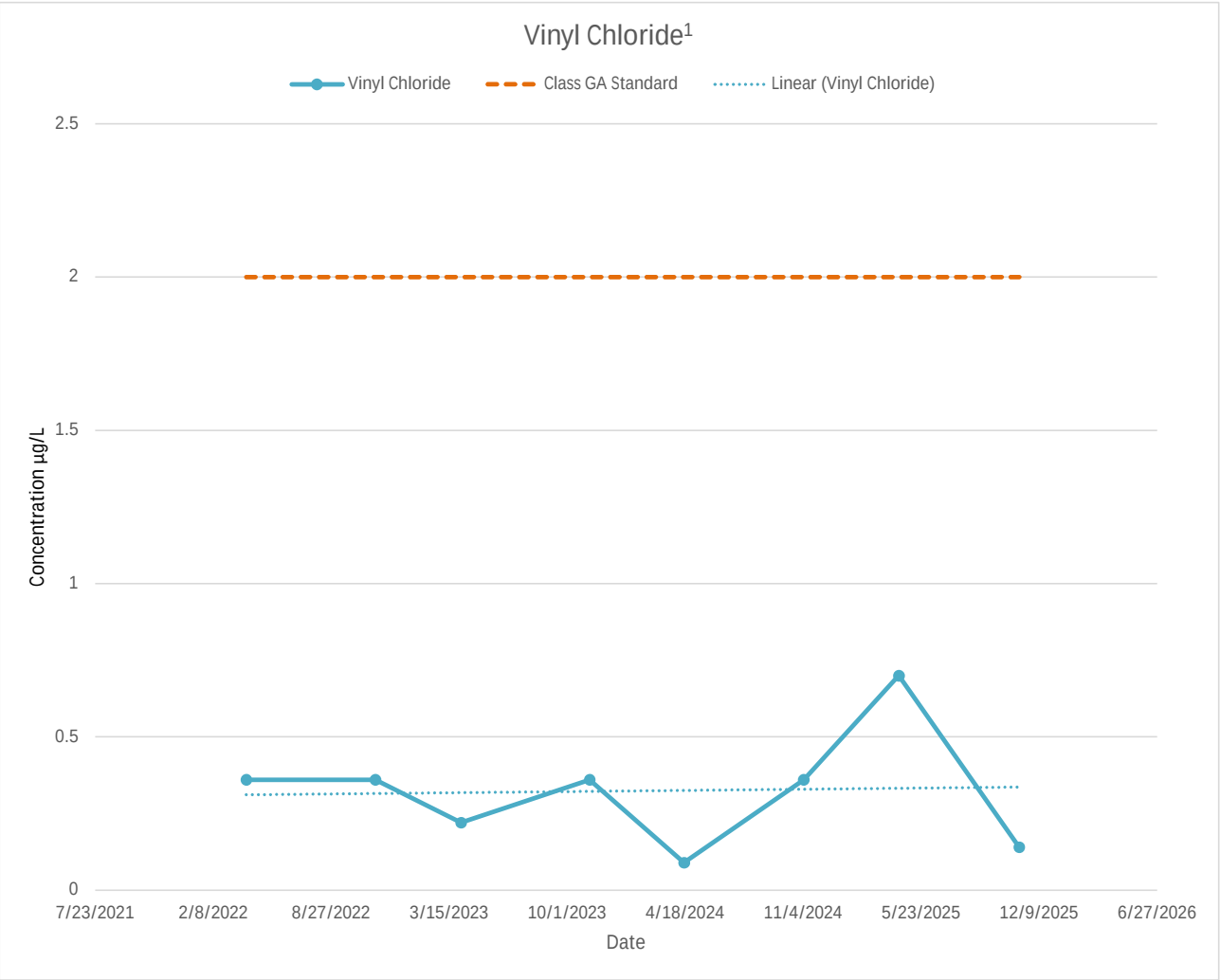
Table 8
PZ-11 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



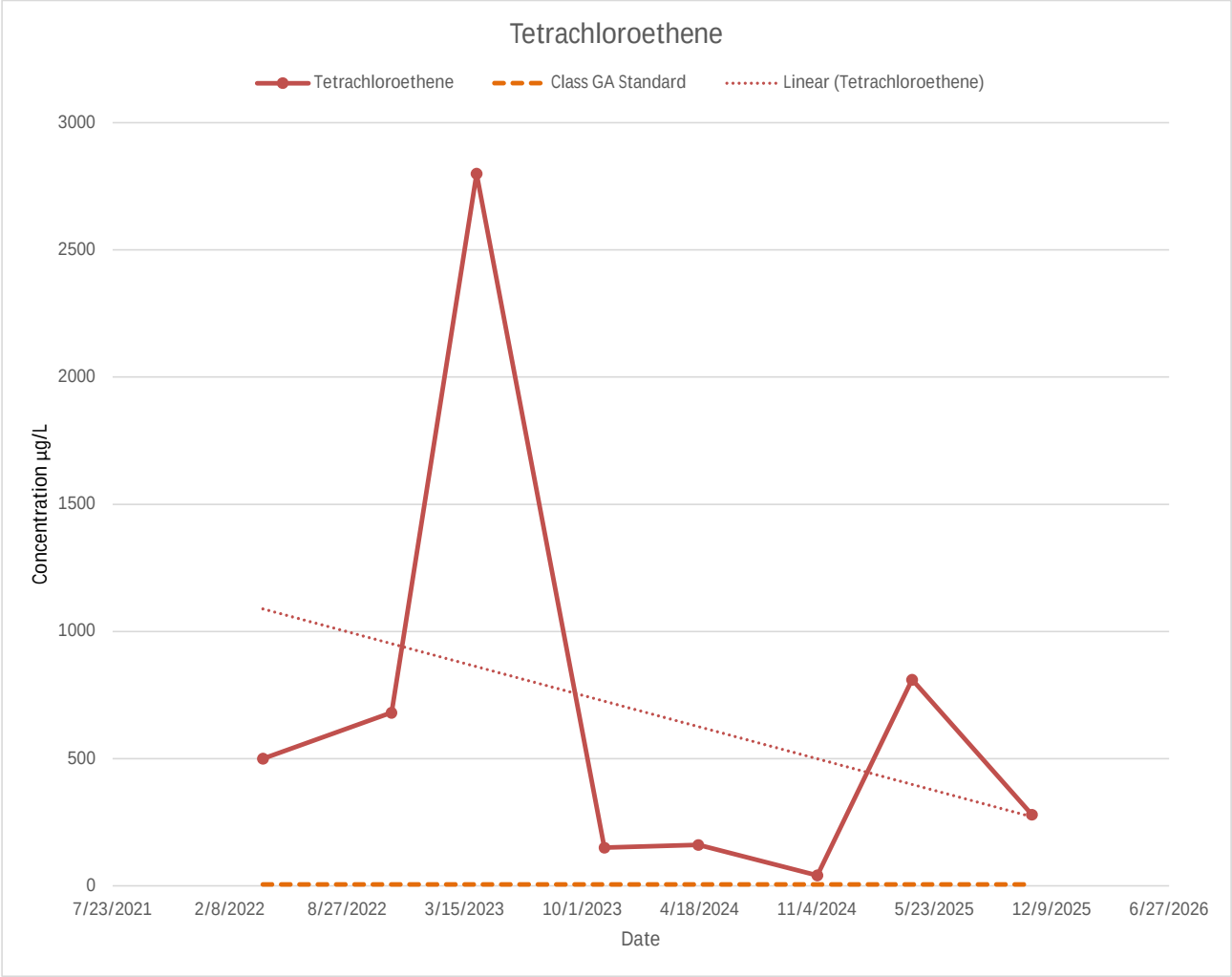
Table 8
PZ-11 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



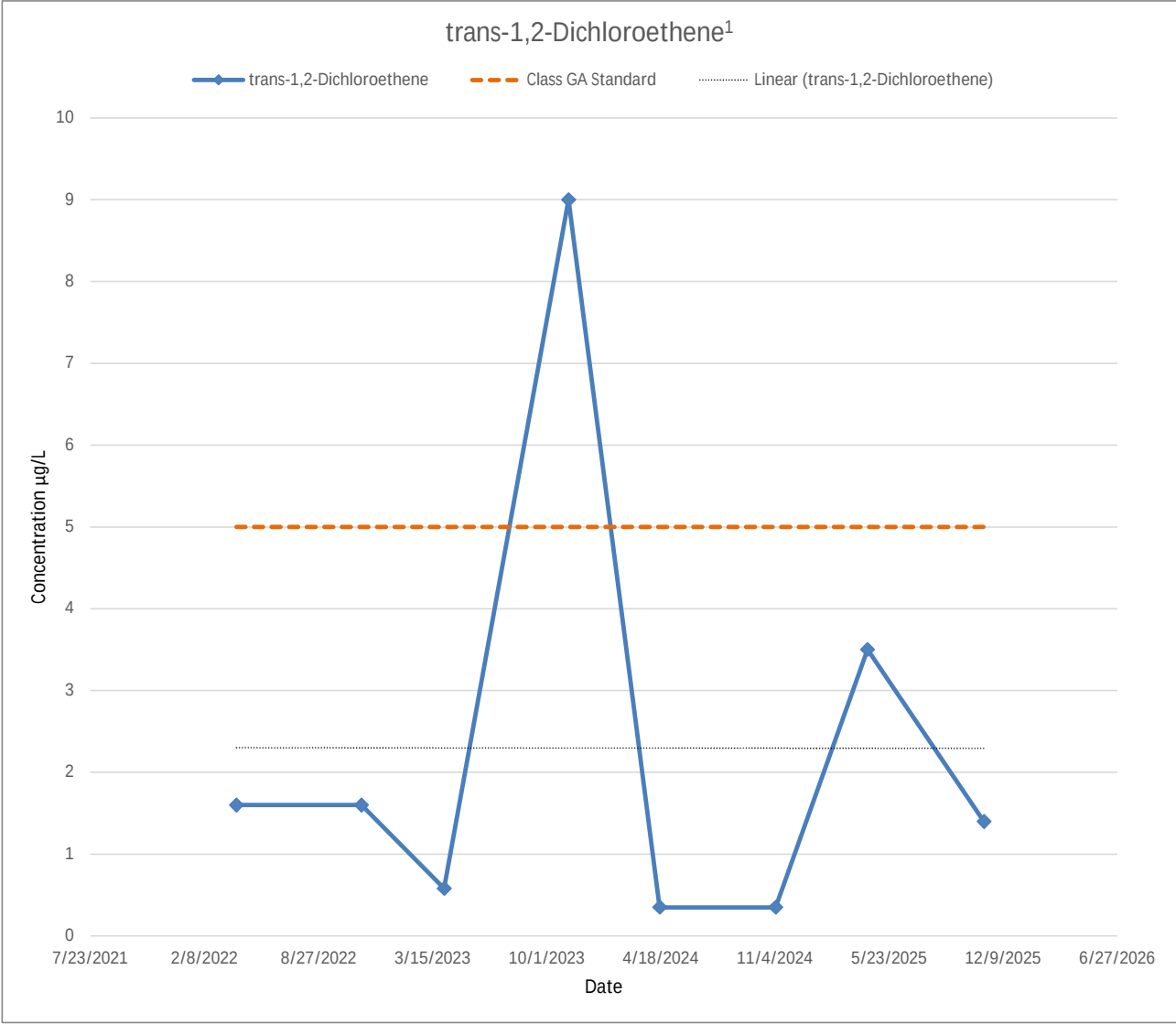
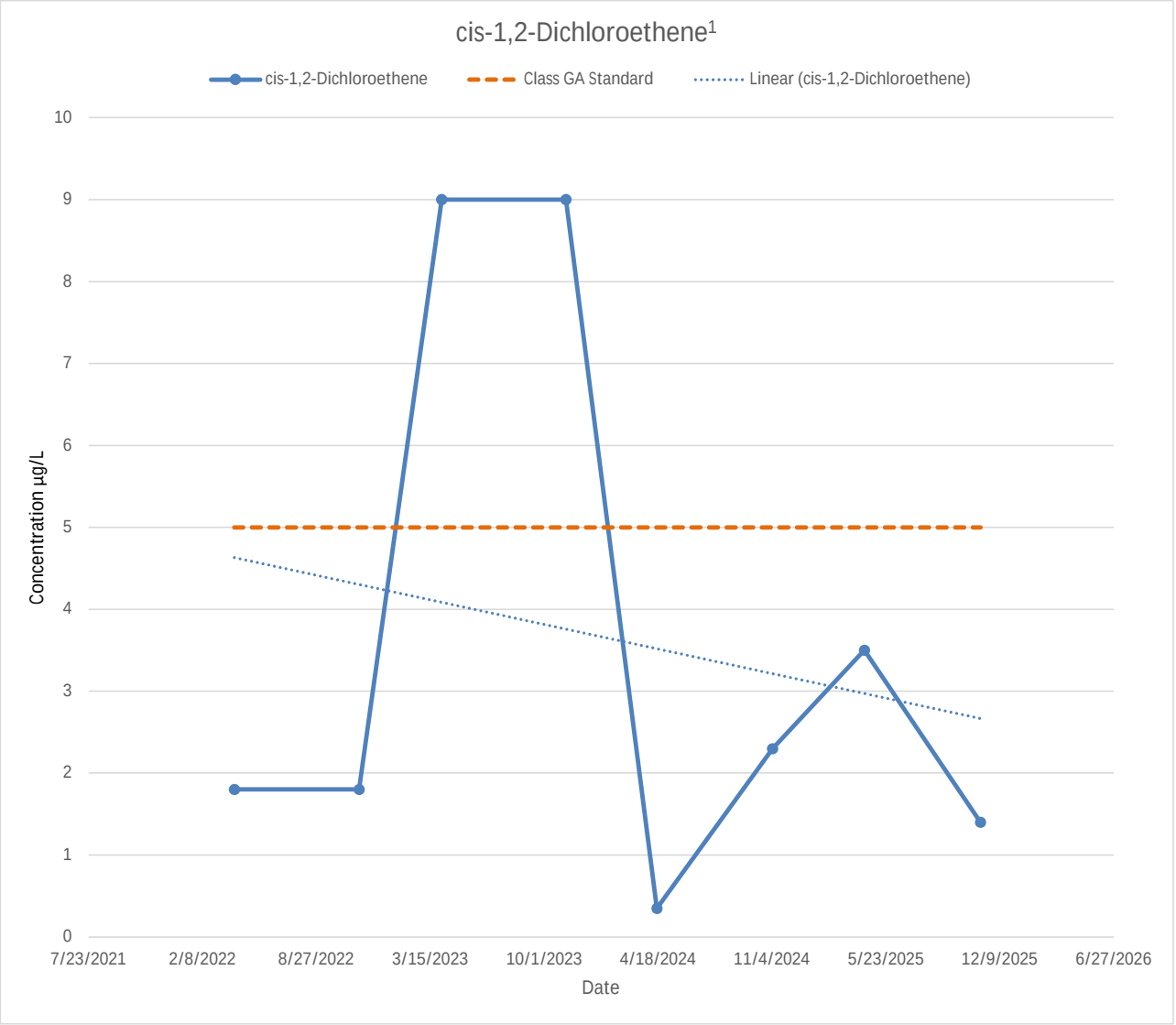
Table 9
PZ-12 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



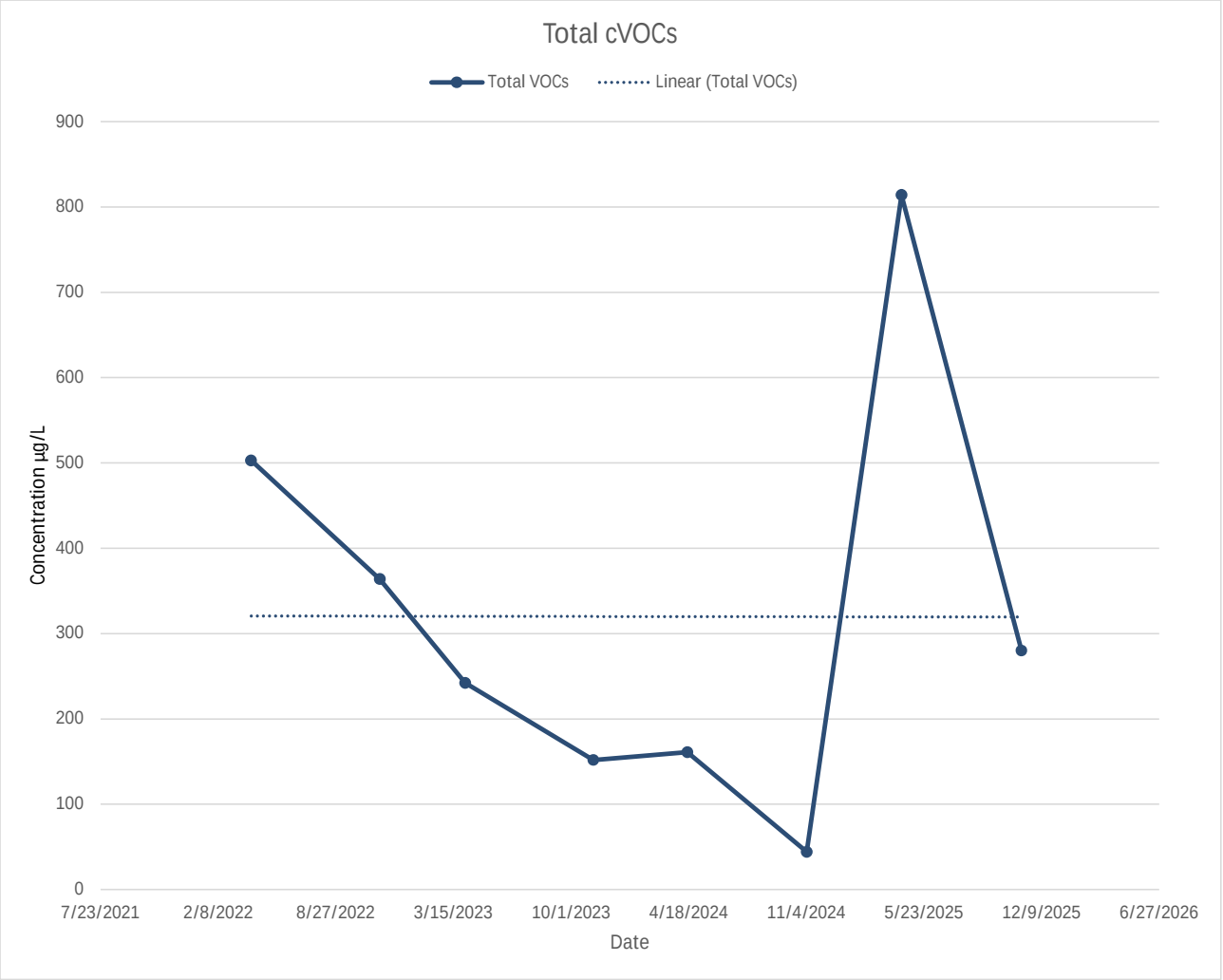
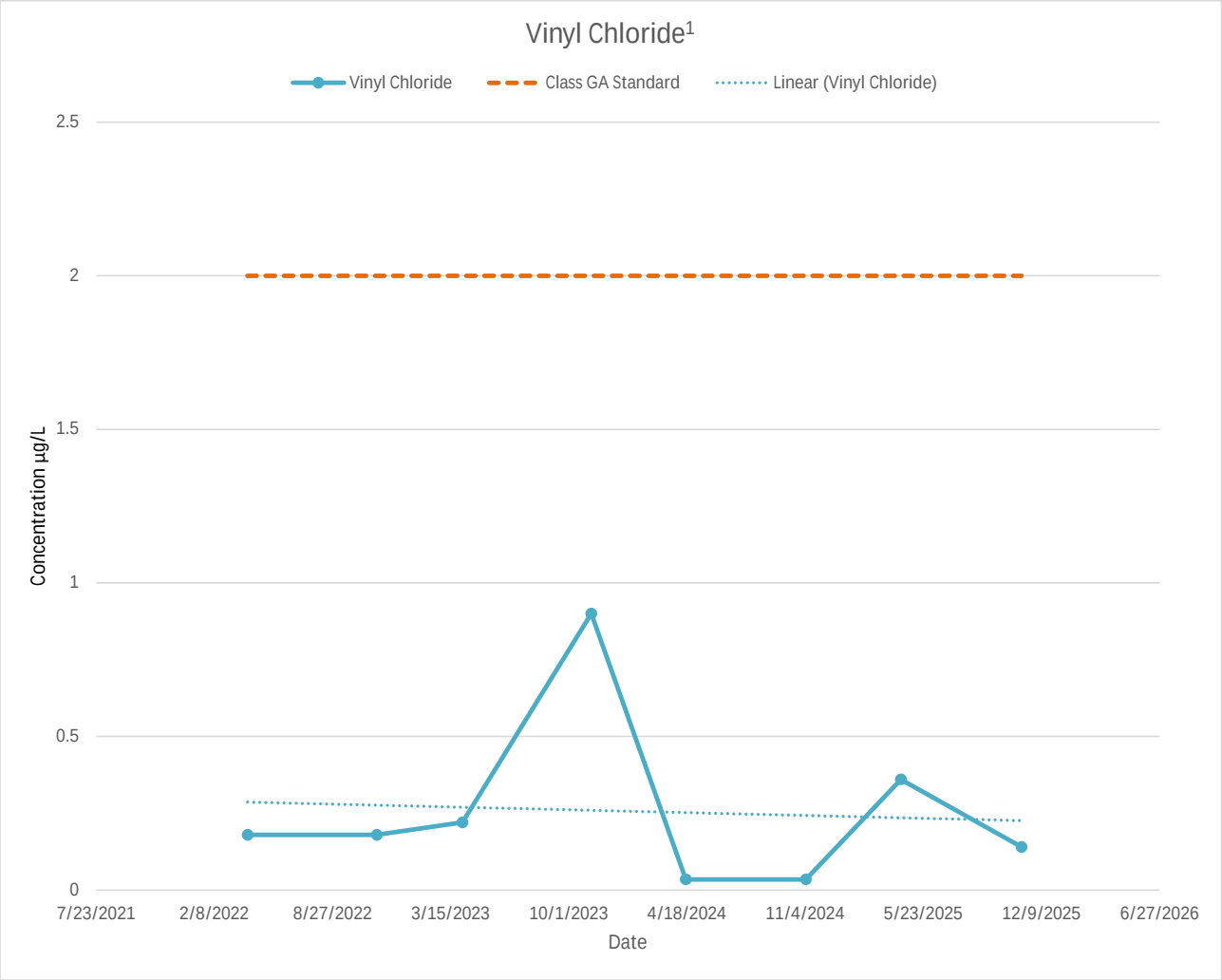
Table 9
PZ-12 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



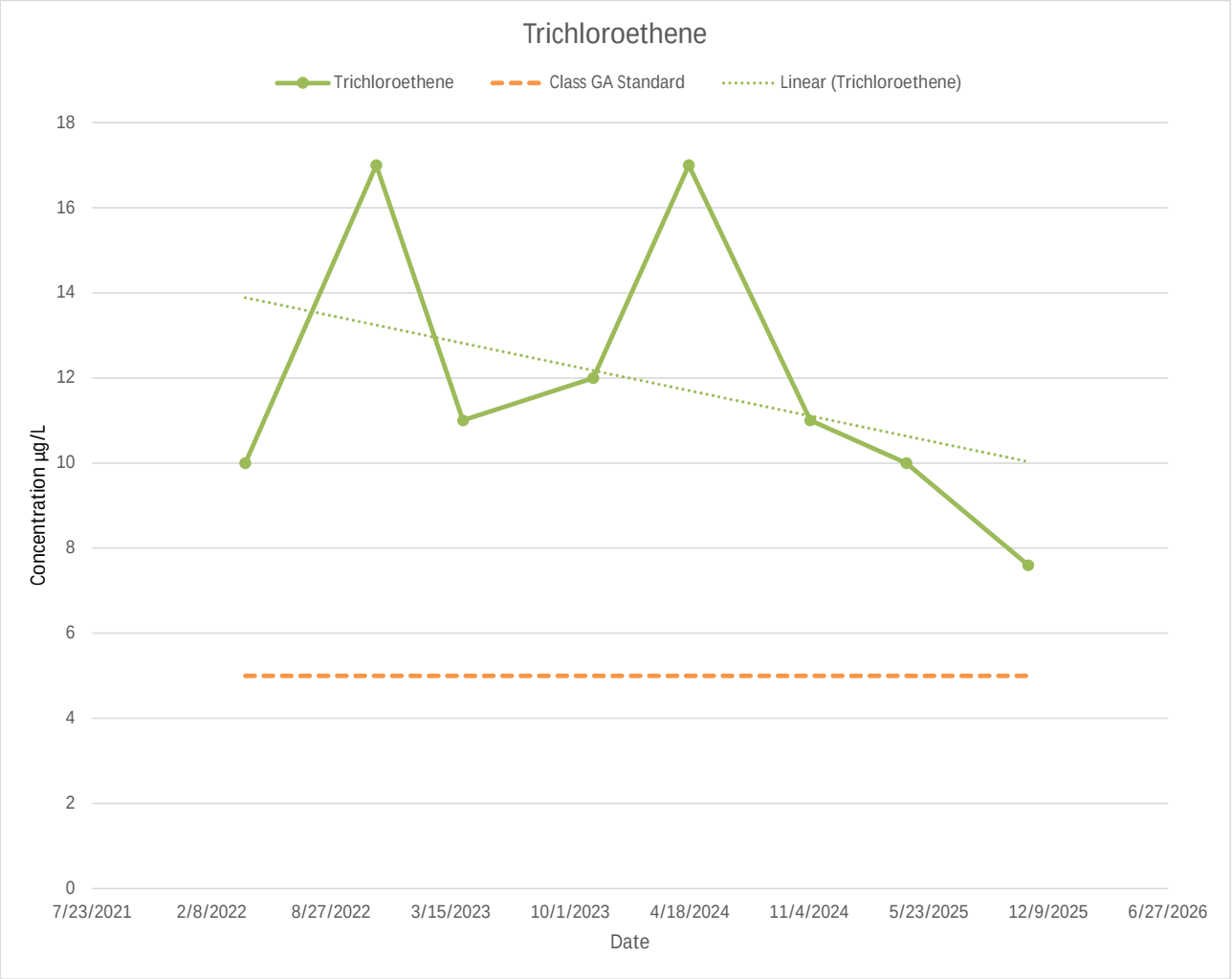
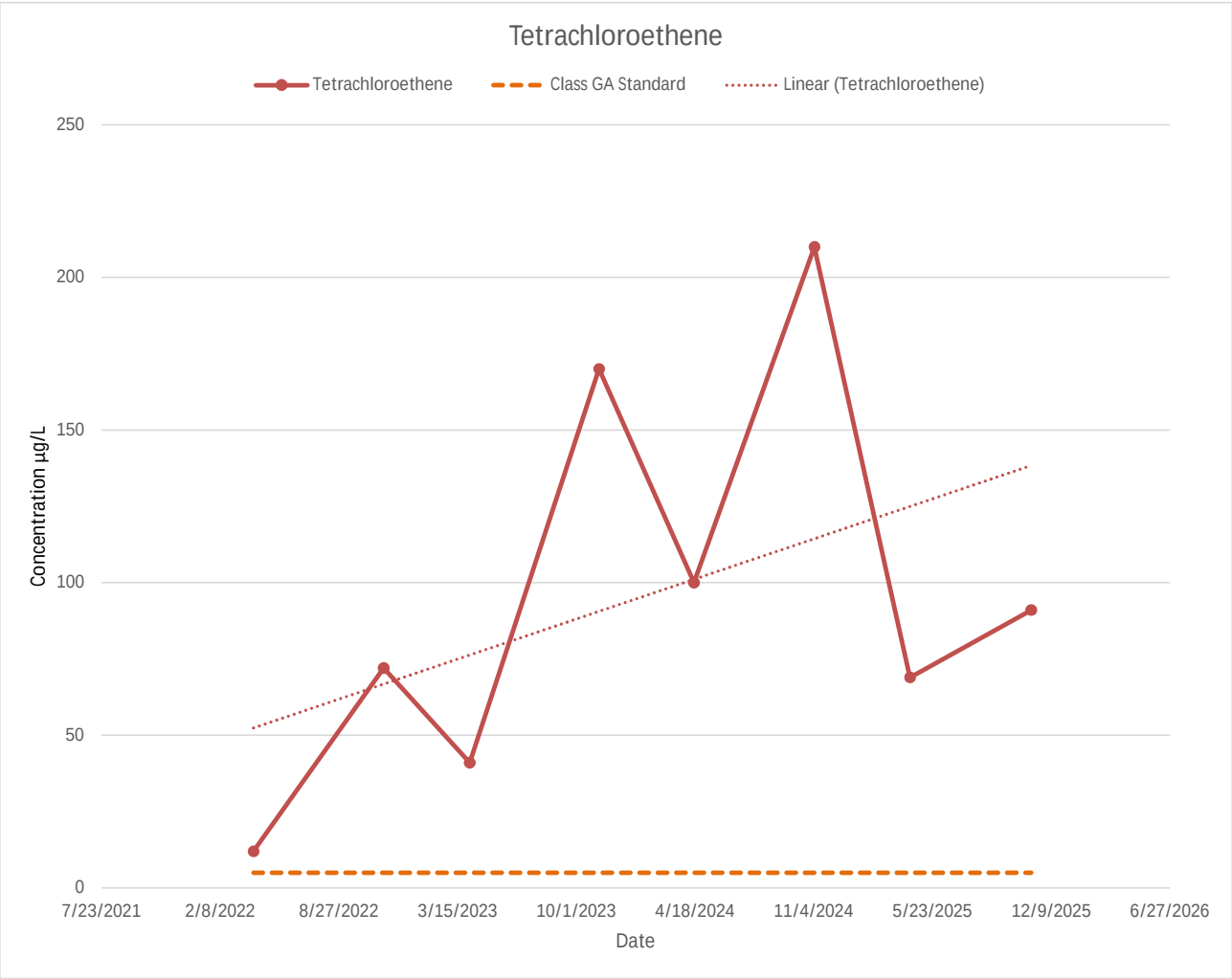
Table 9
PZ-12 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



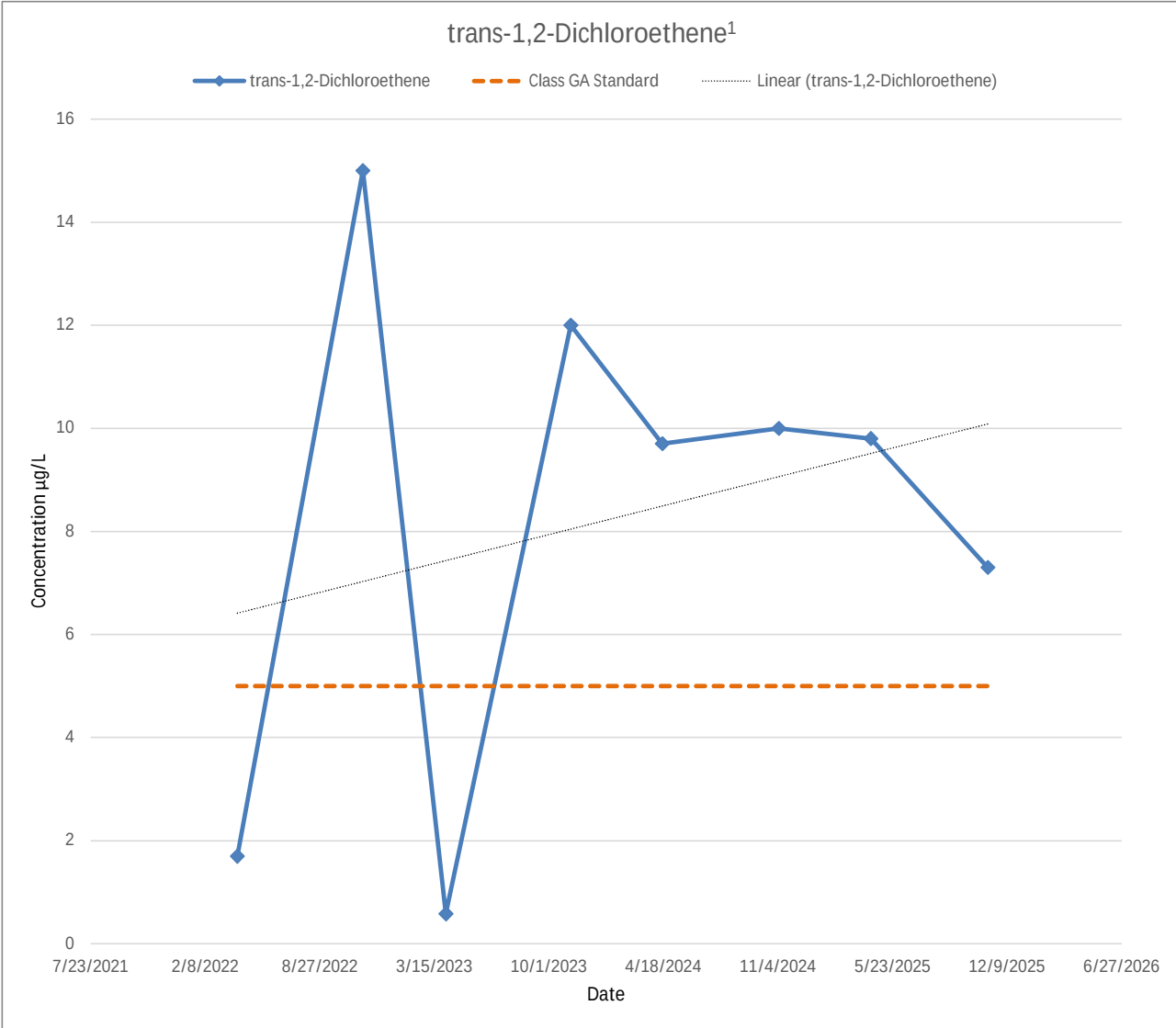
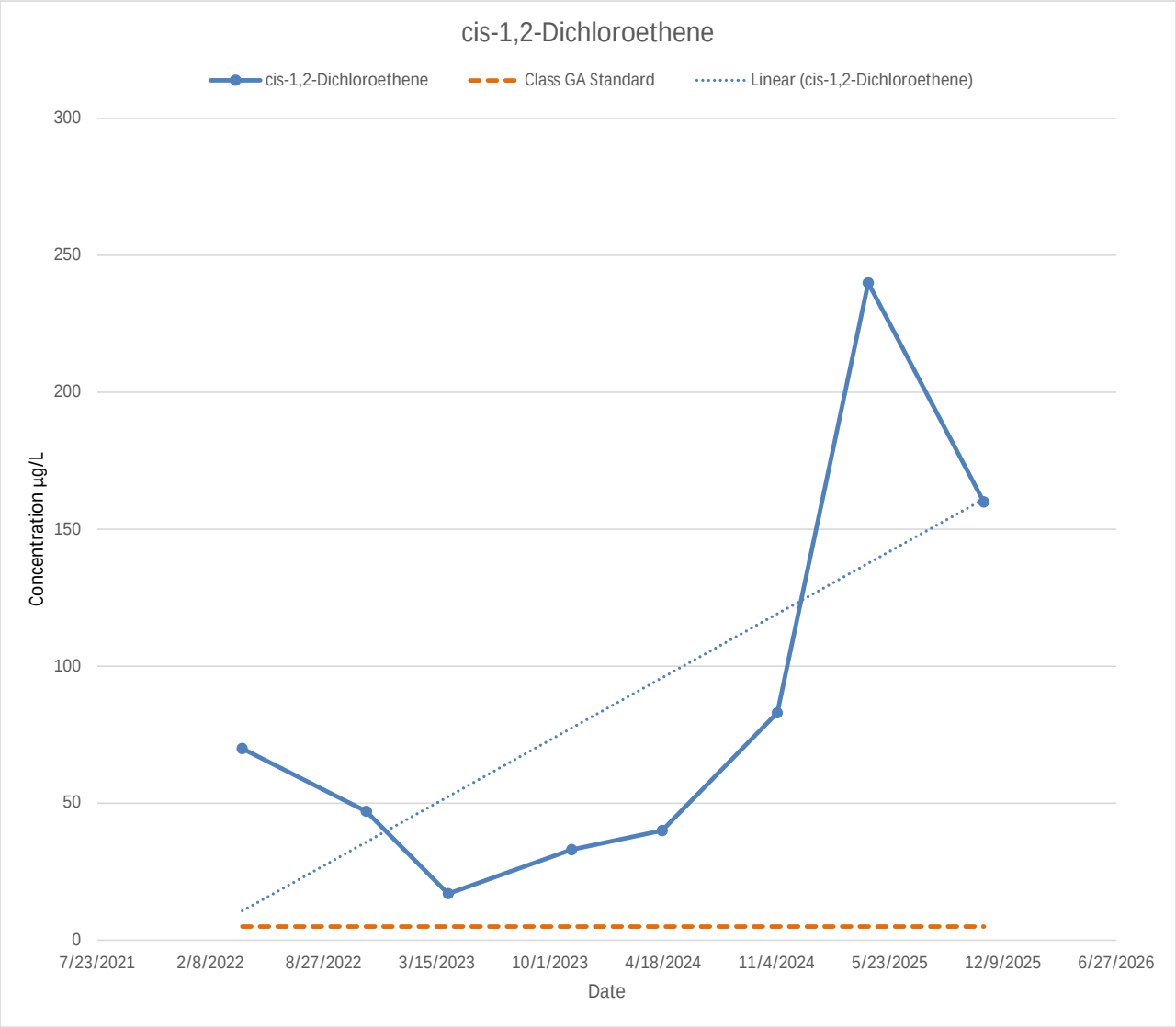
Table 10
PZ-13 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



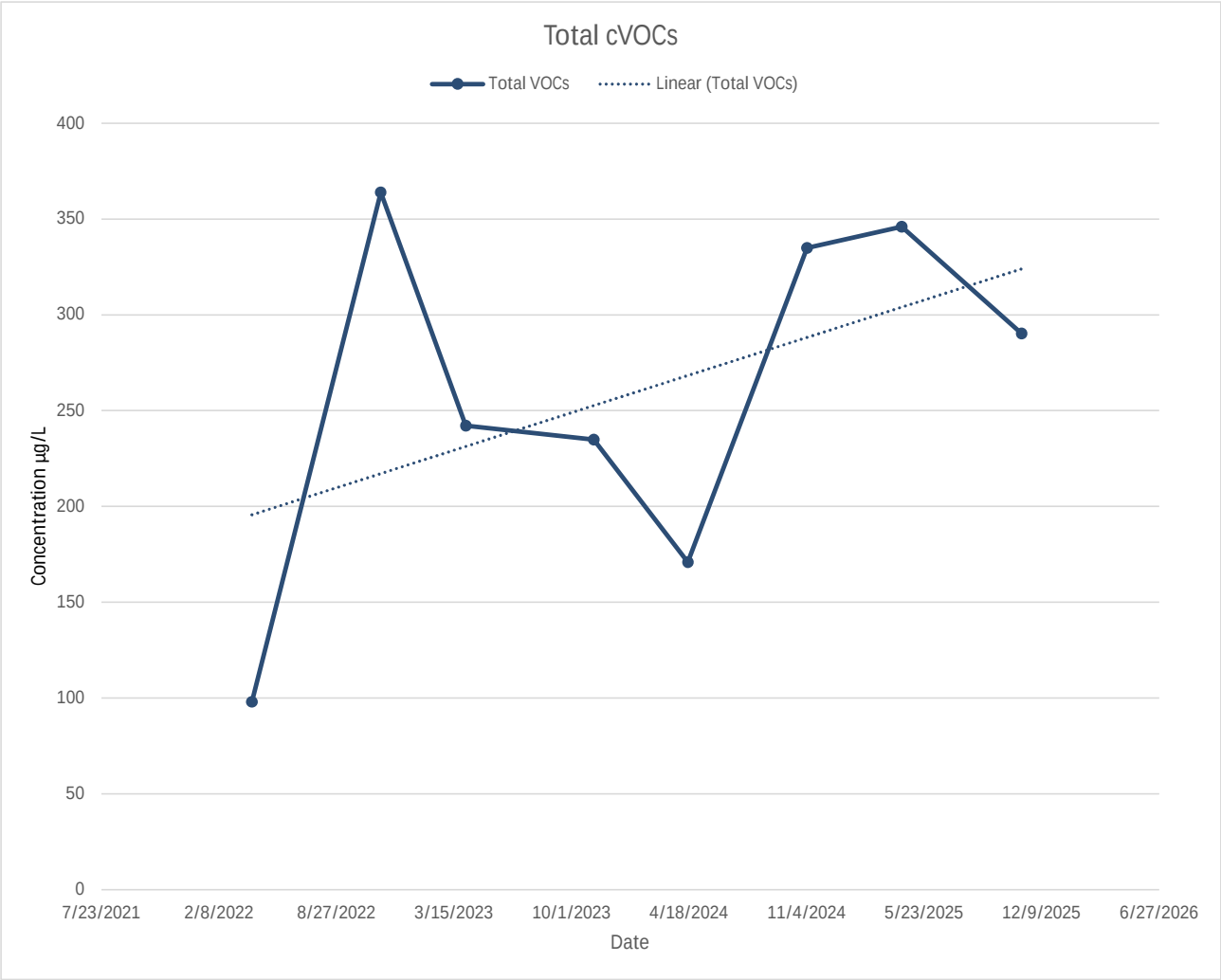
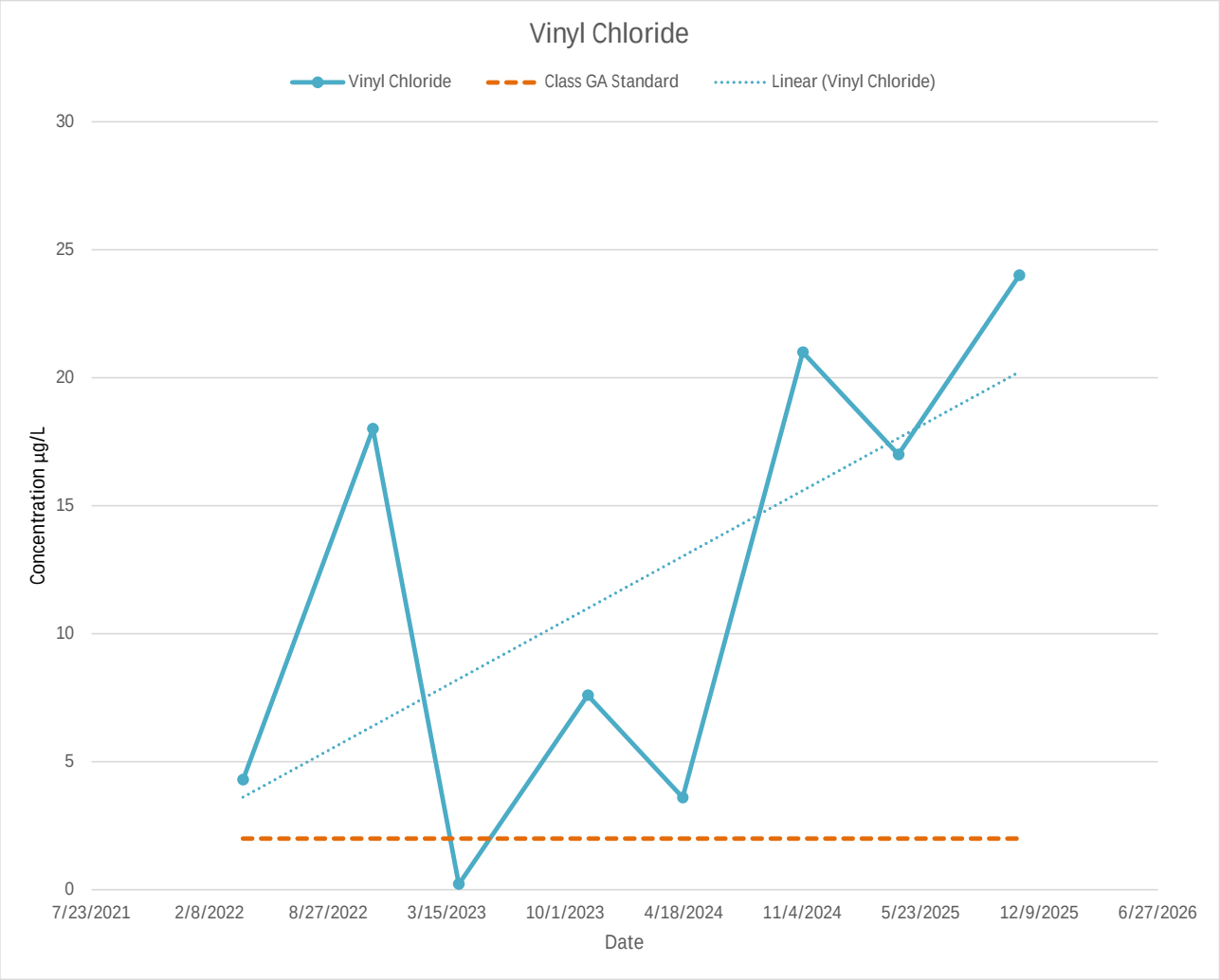
Table 10
PZ-13 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



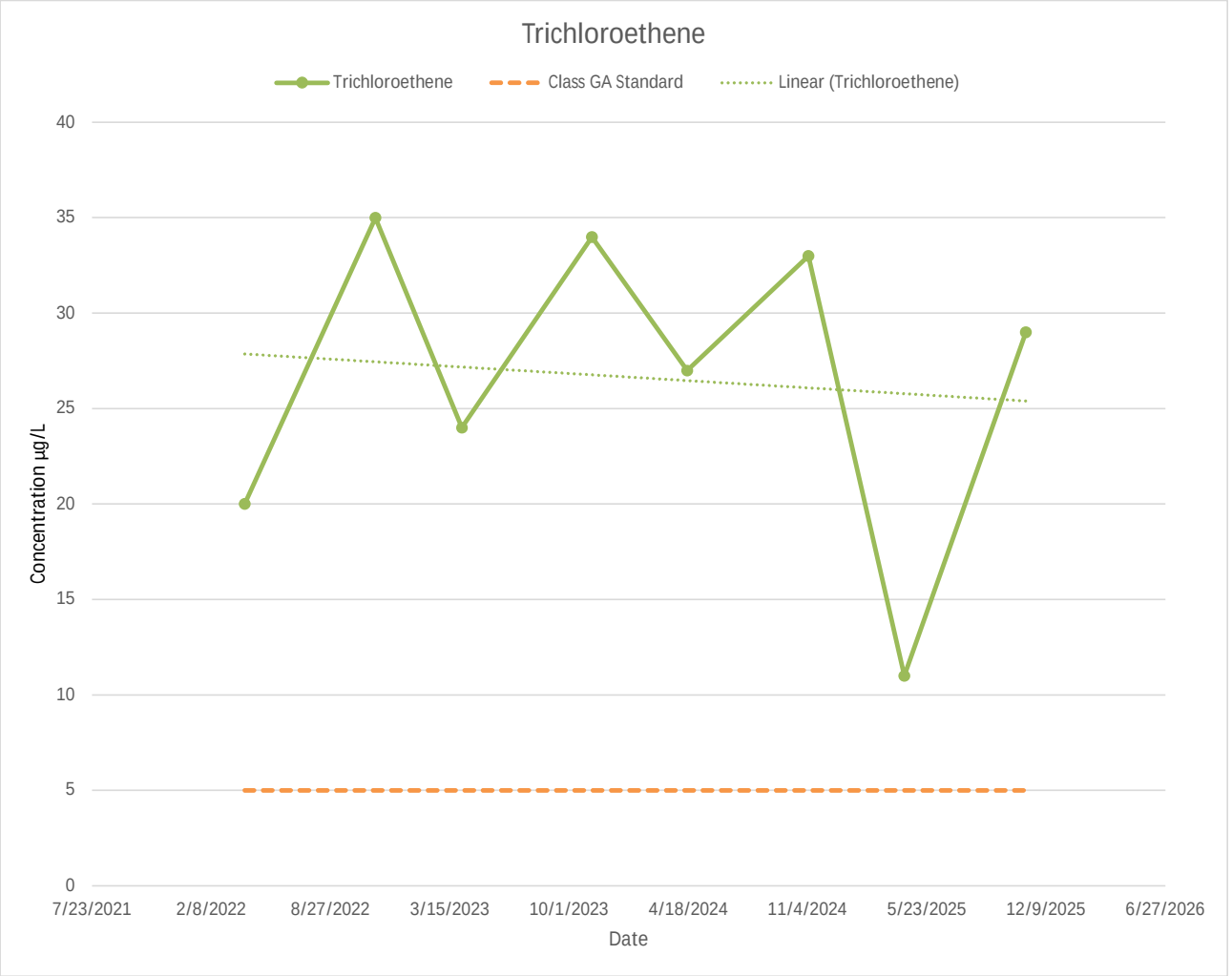
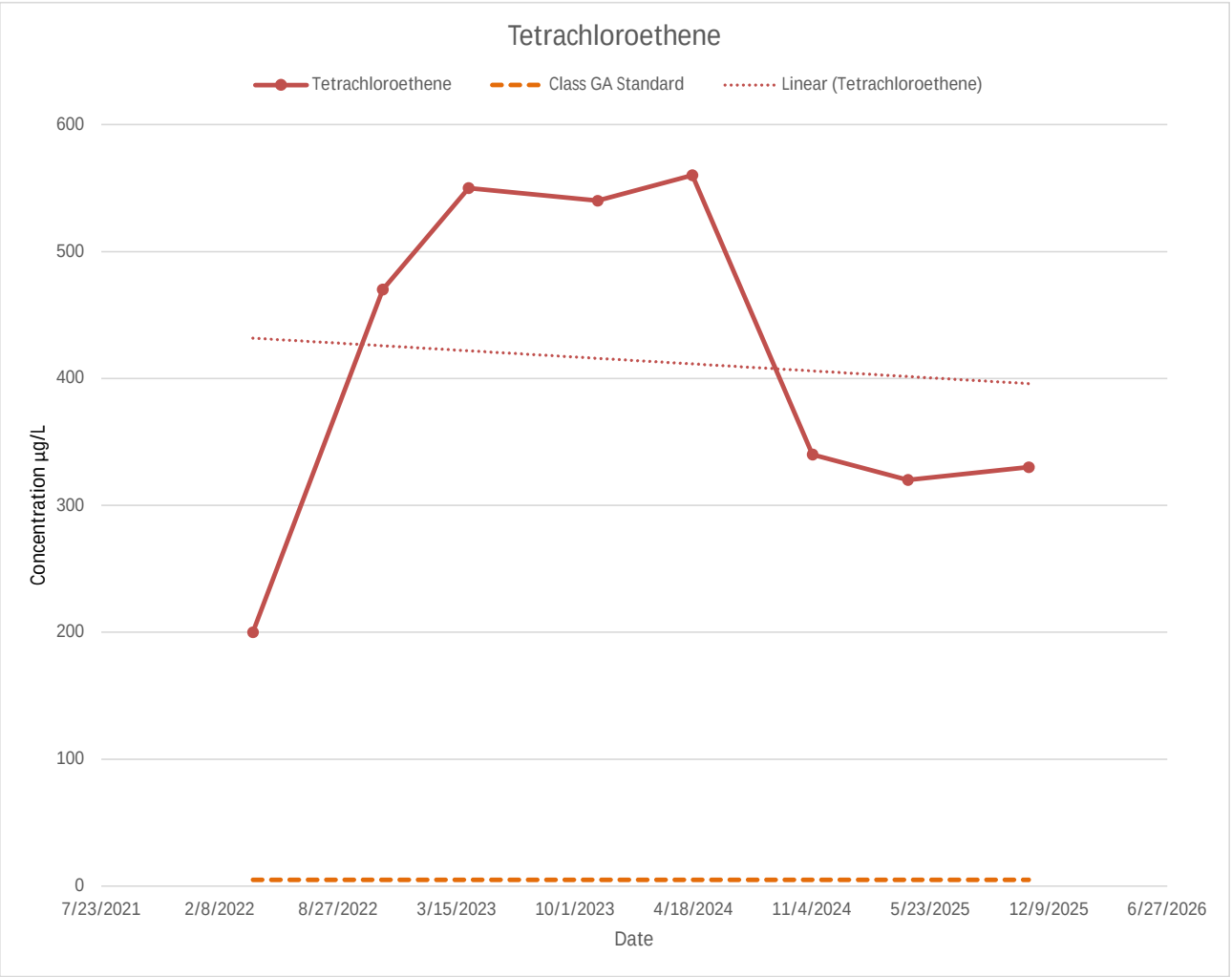
Table 10
PZ-13 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



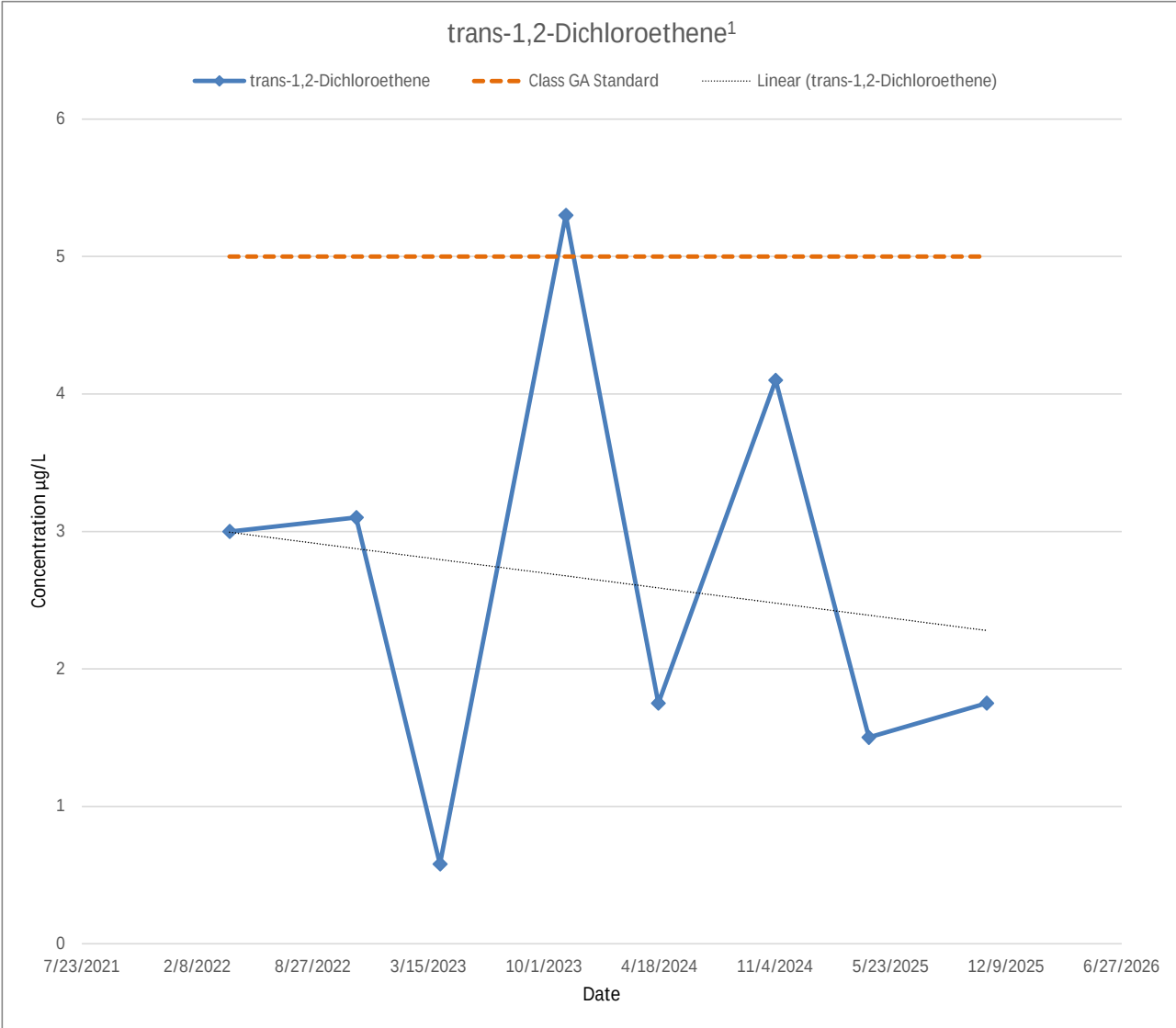
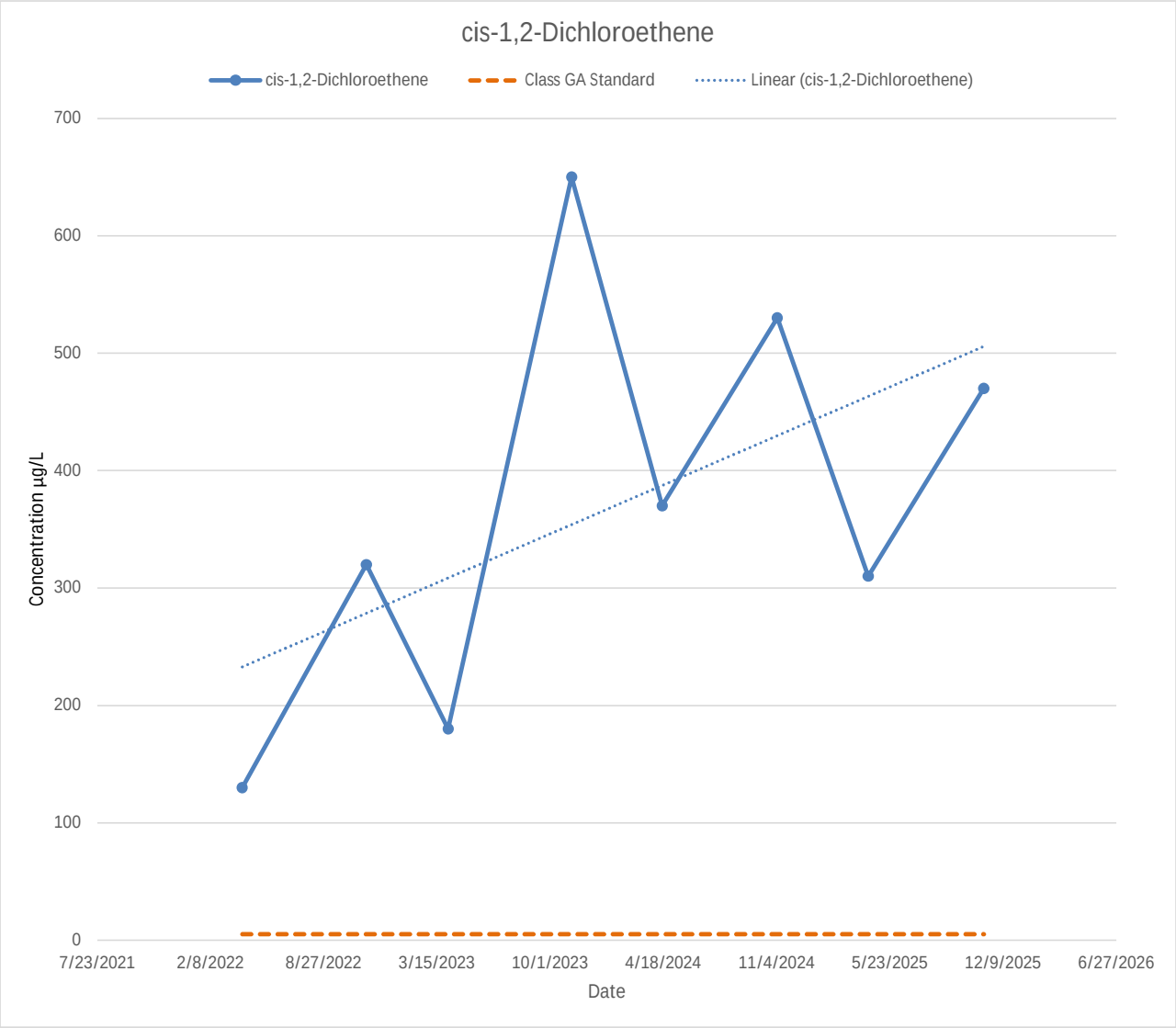
Table 11
PZ-14 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



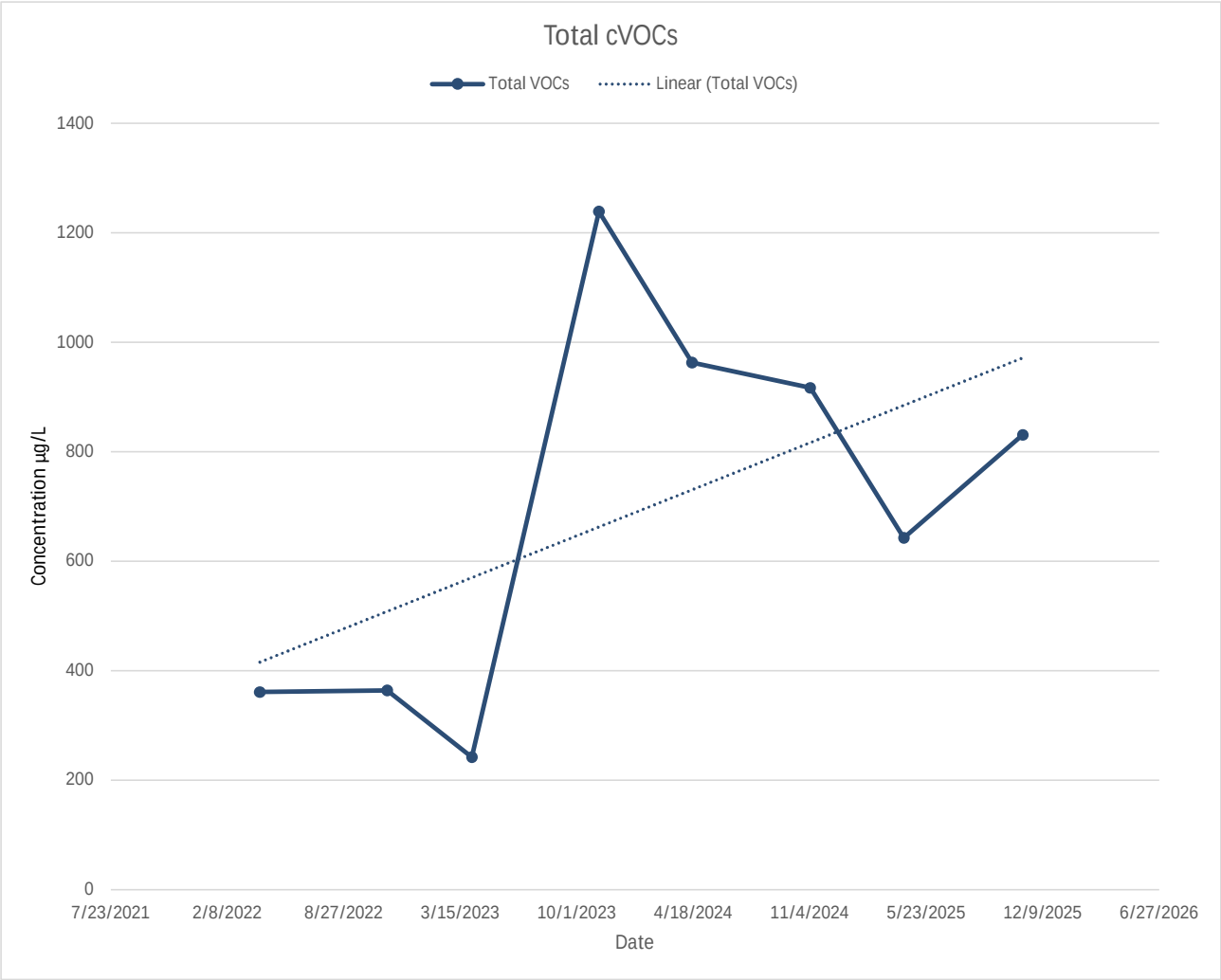
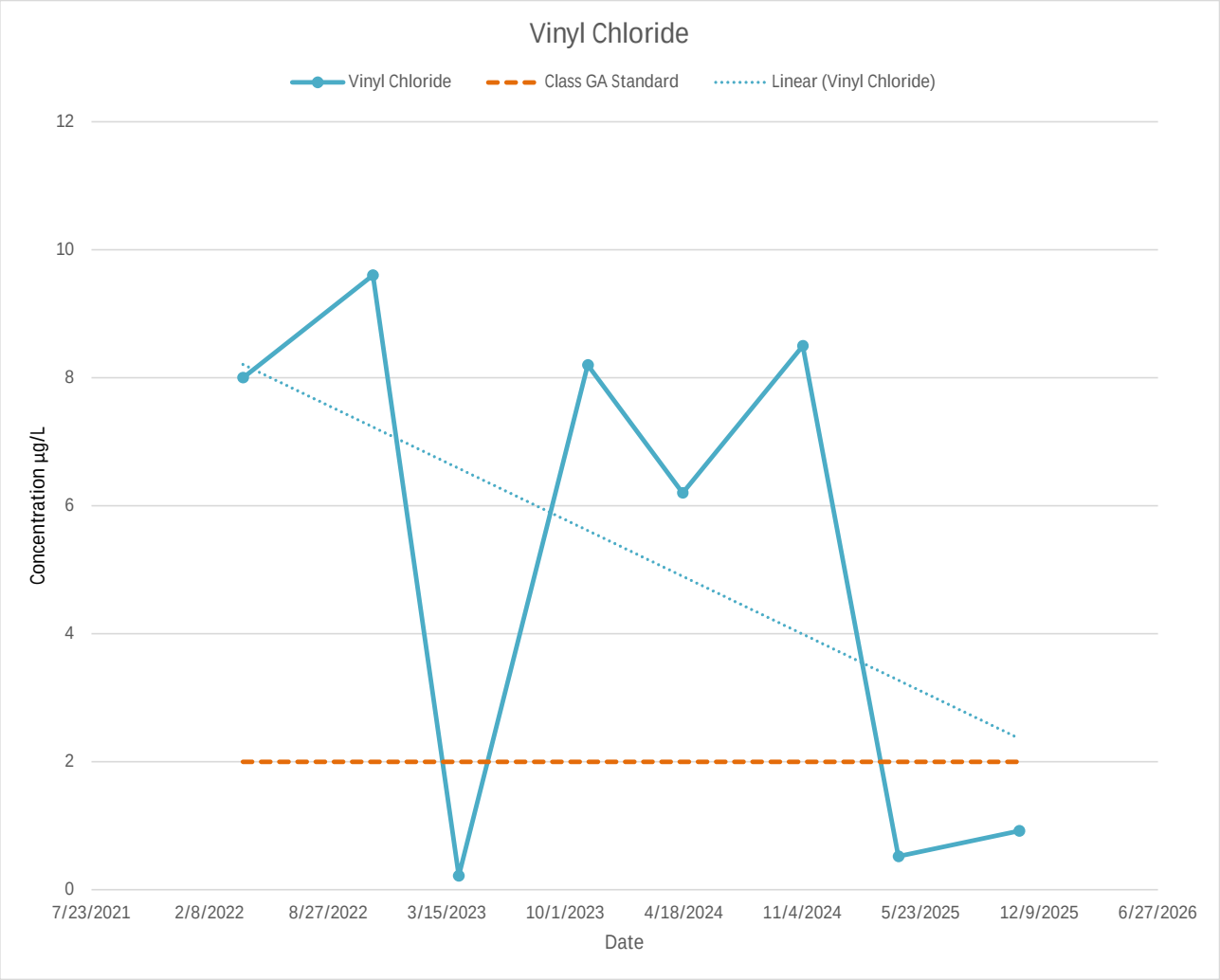
Table 11
PZ-14 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



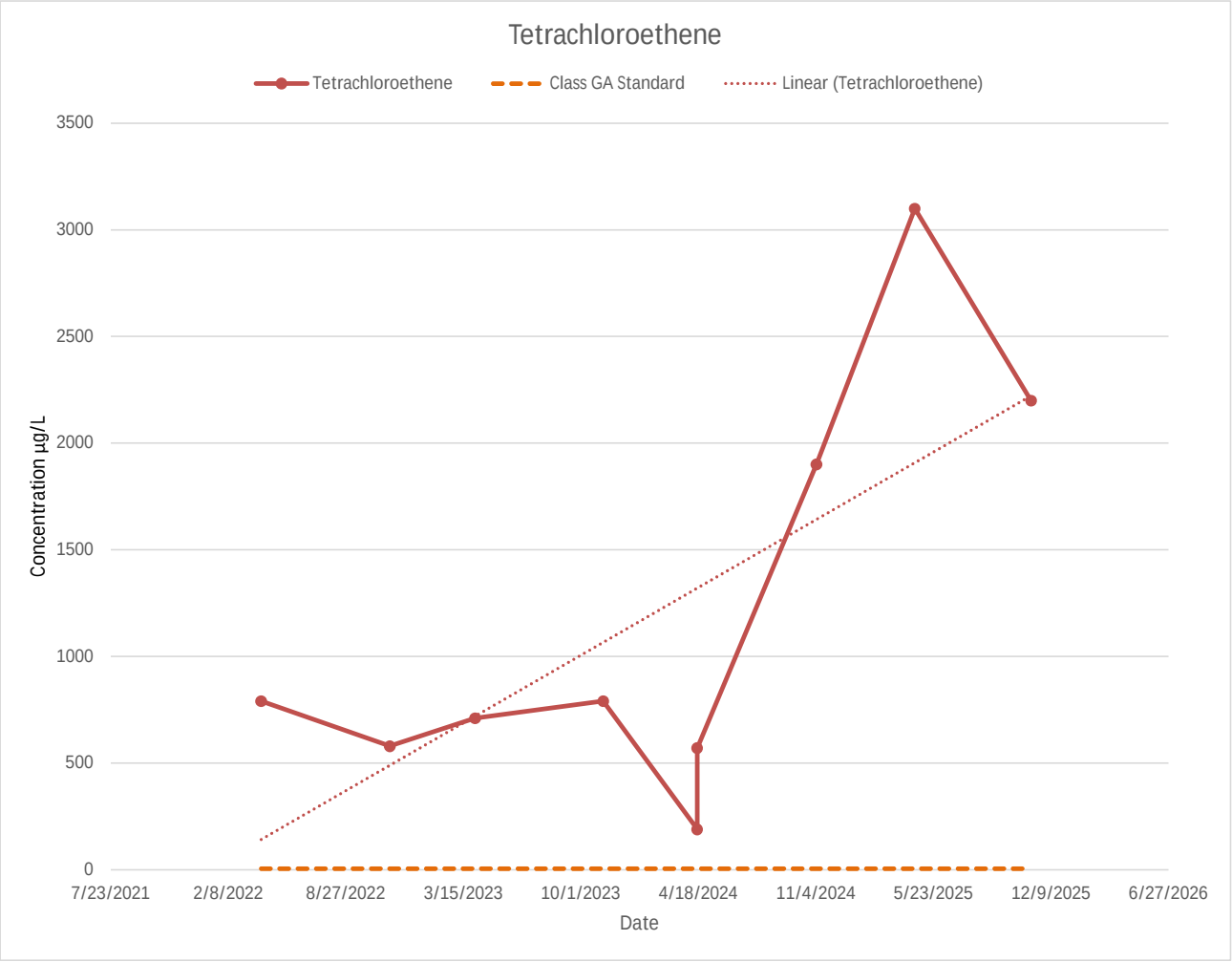
Table 11
PZ-14 Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



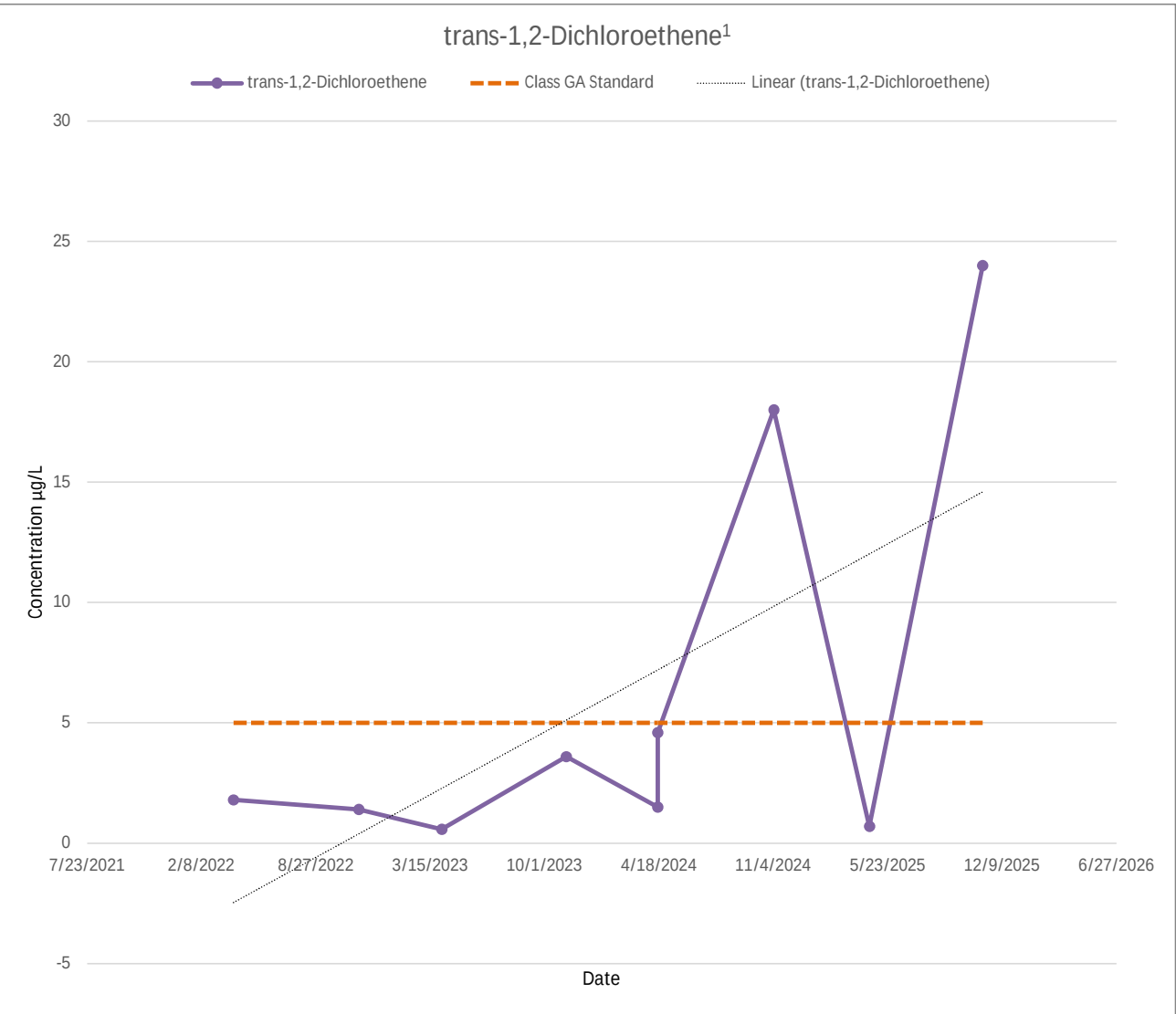
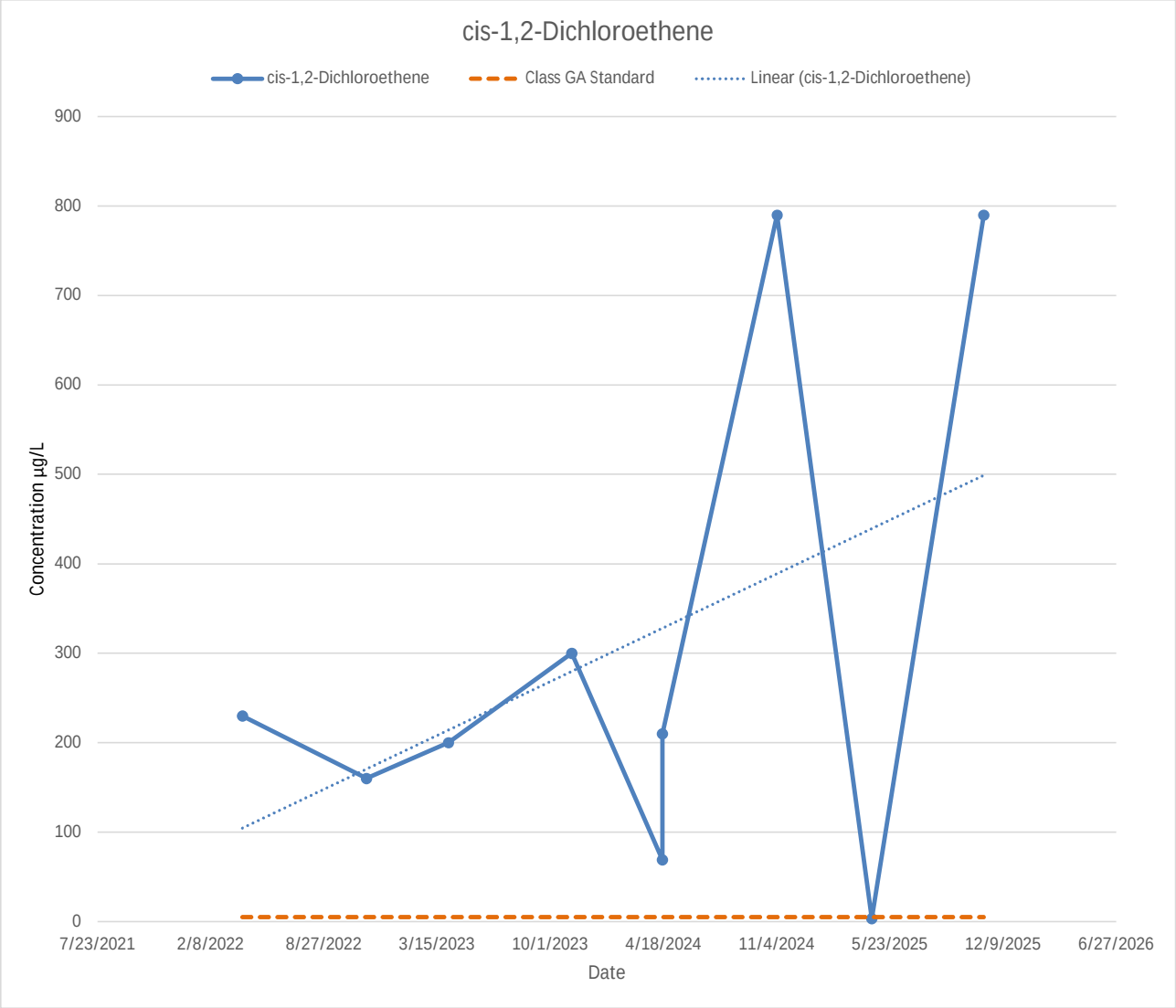
Table 12
MW-5R Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



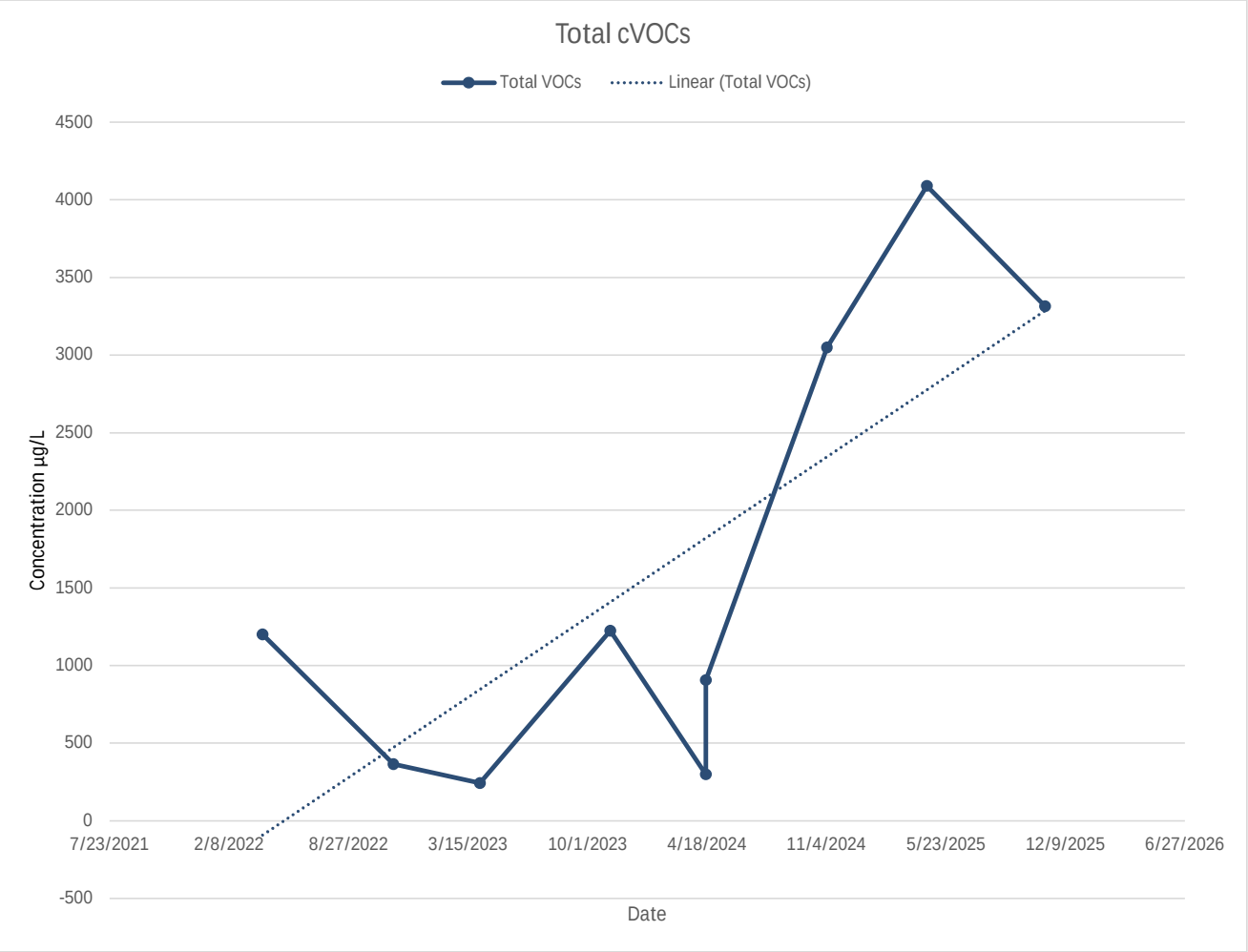
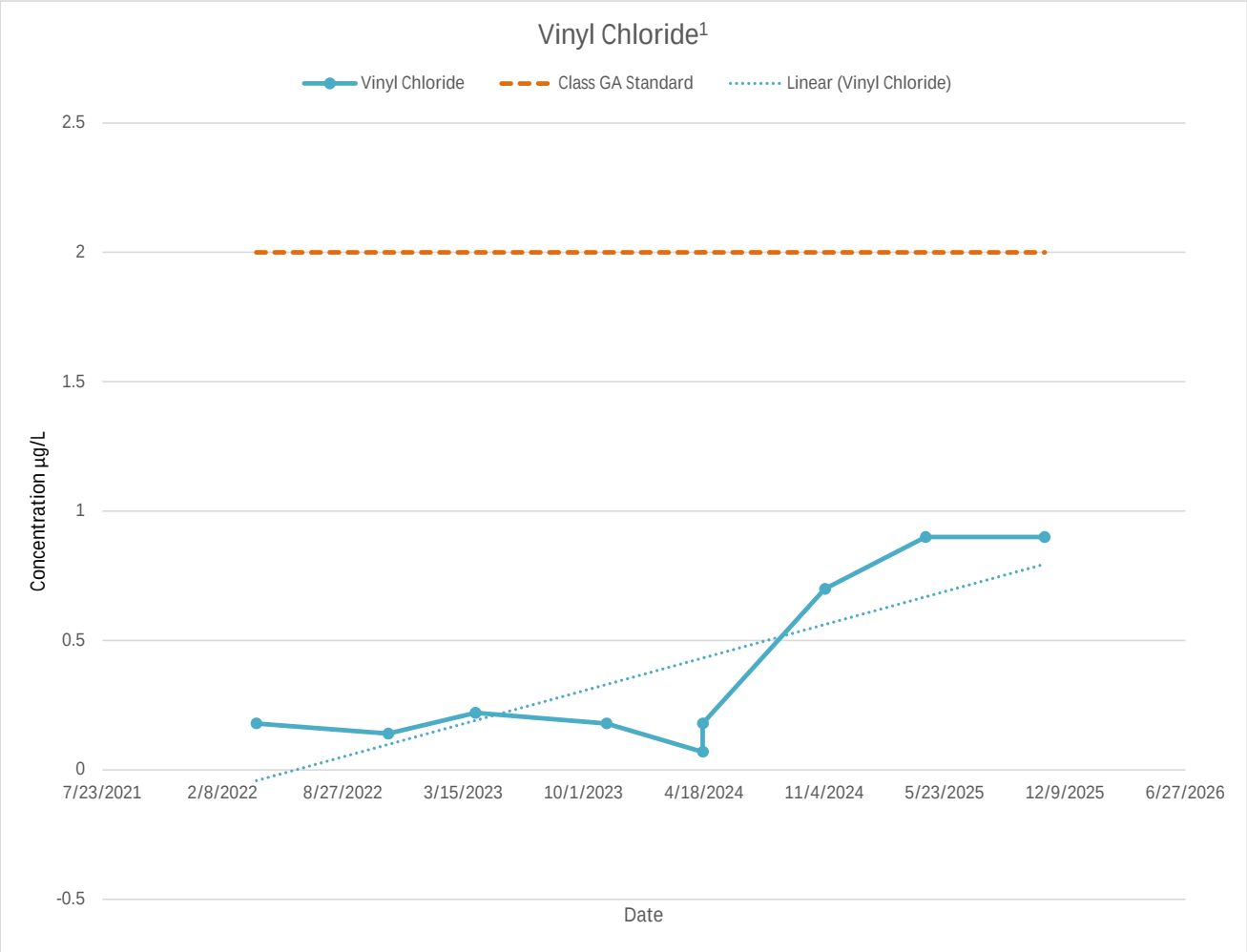
Table 12
MW-5R Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



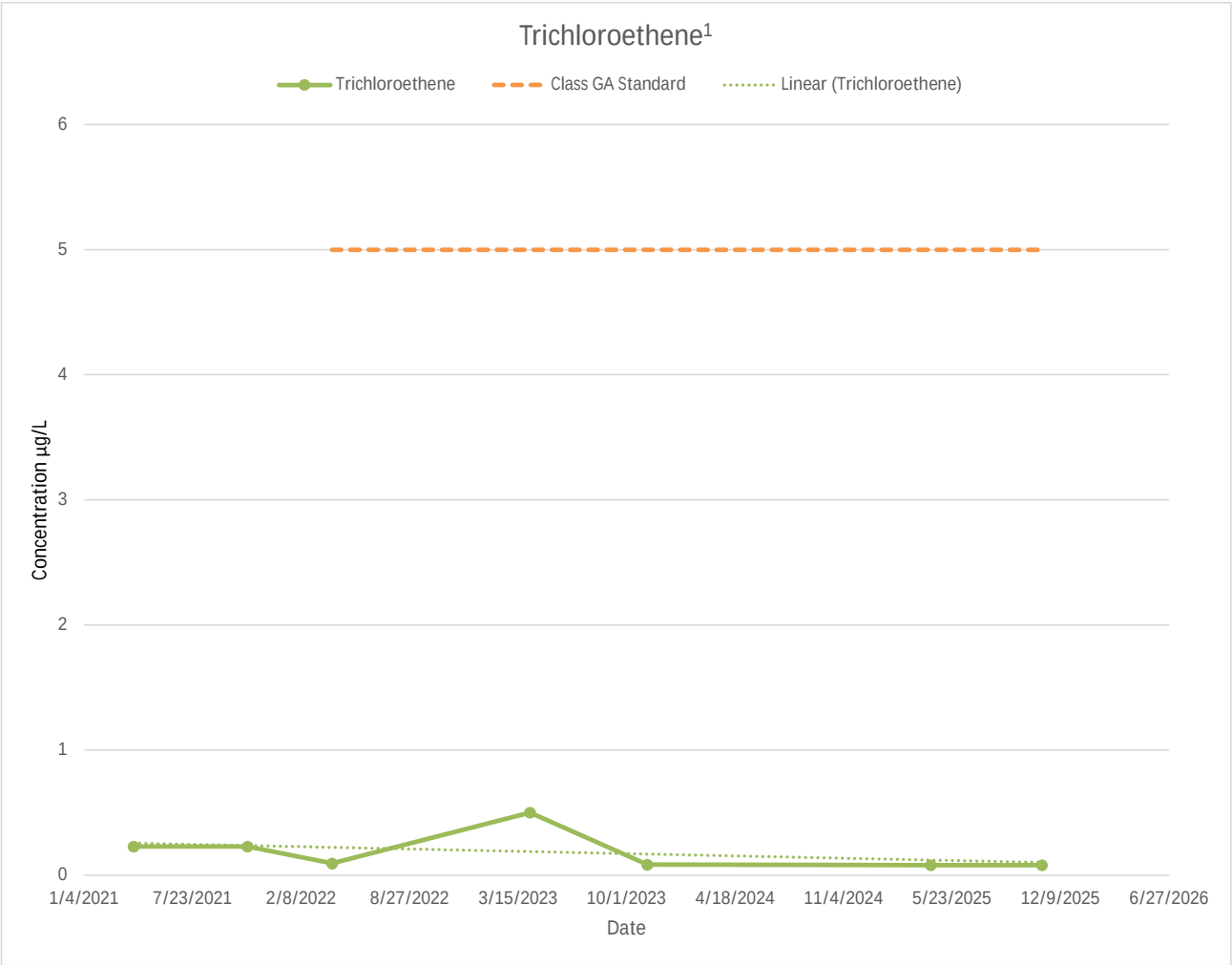
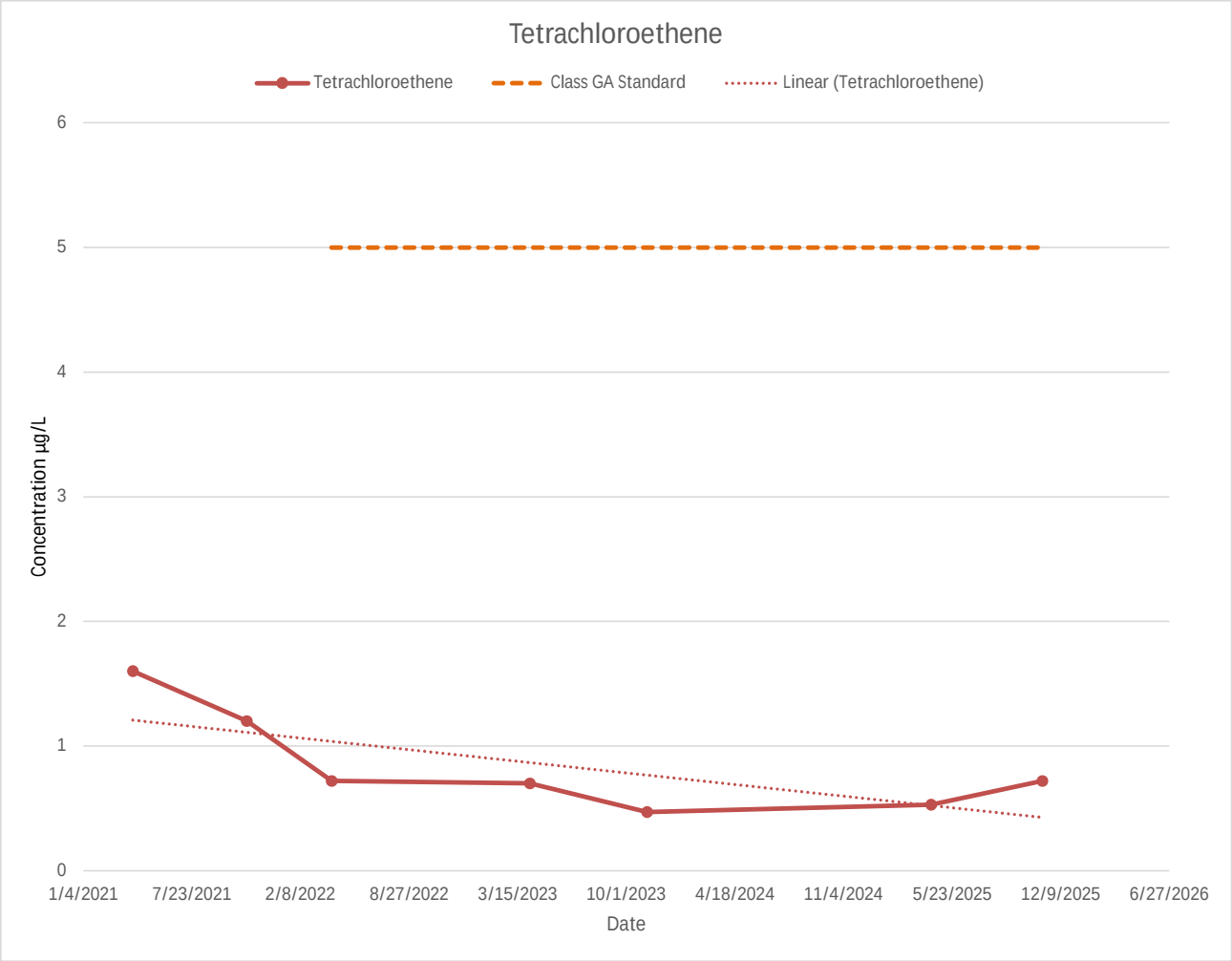
Table 12
MW-5R Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



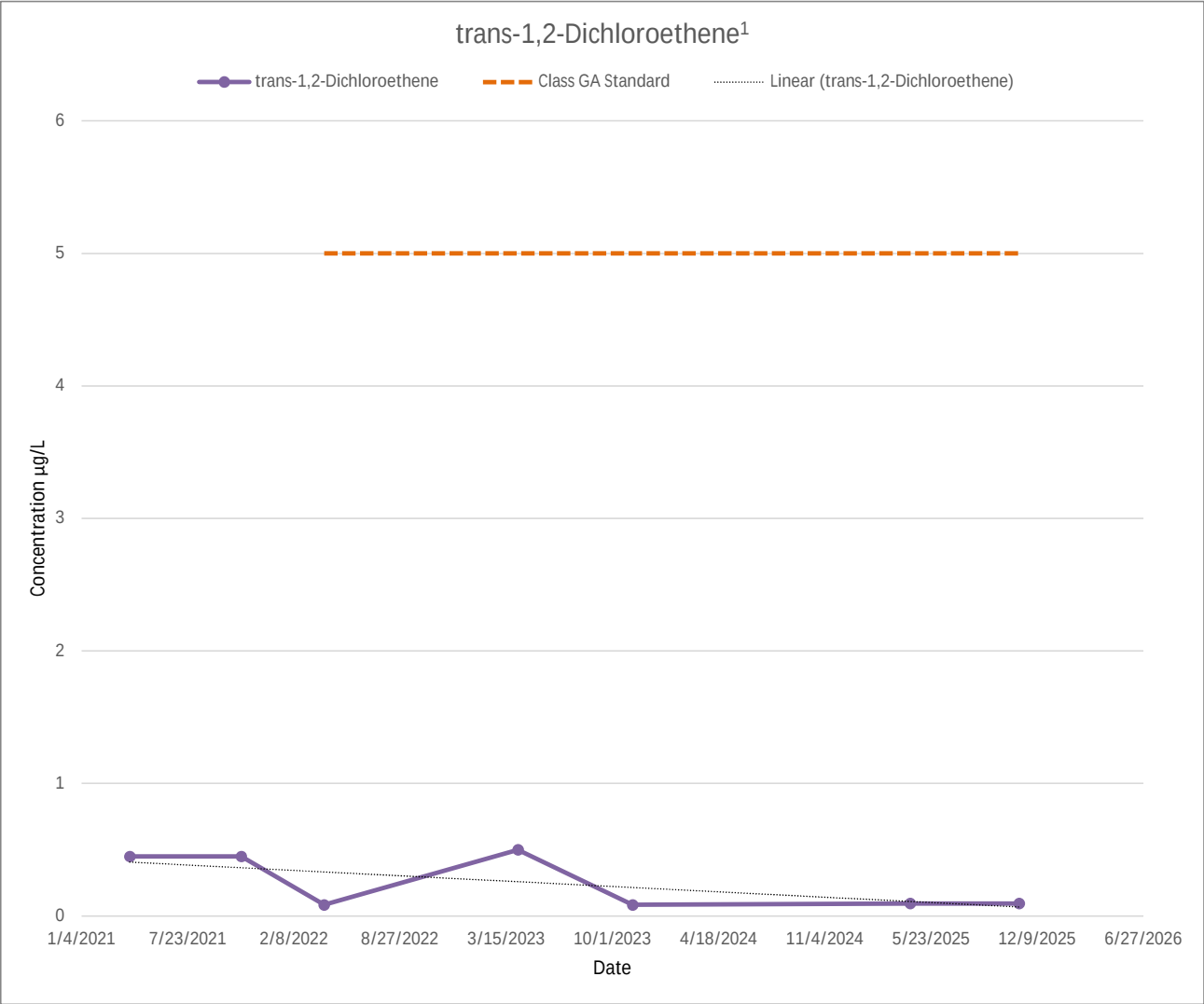
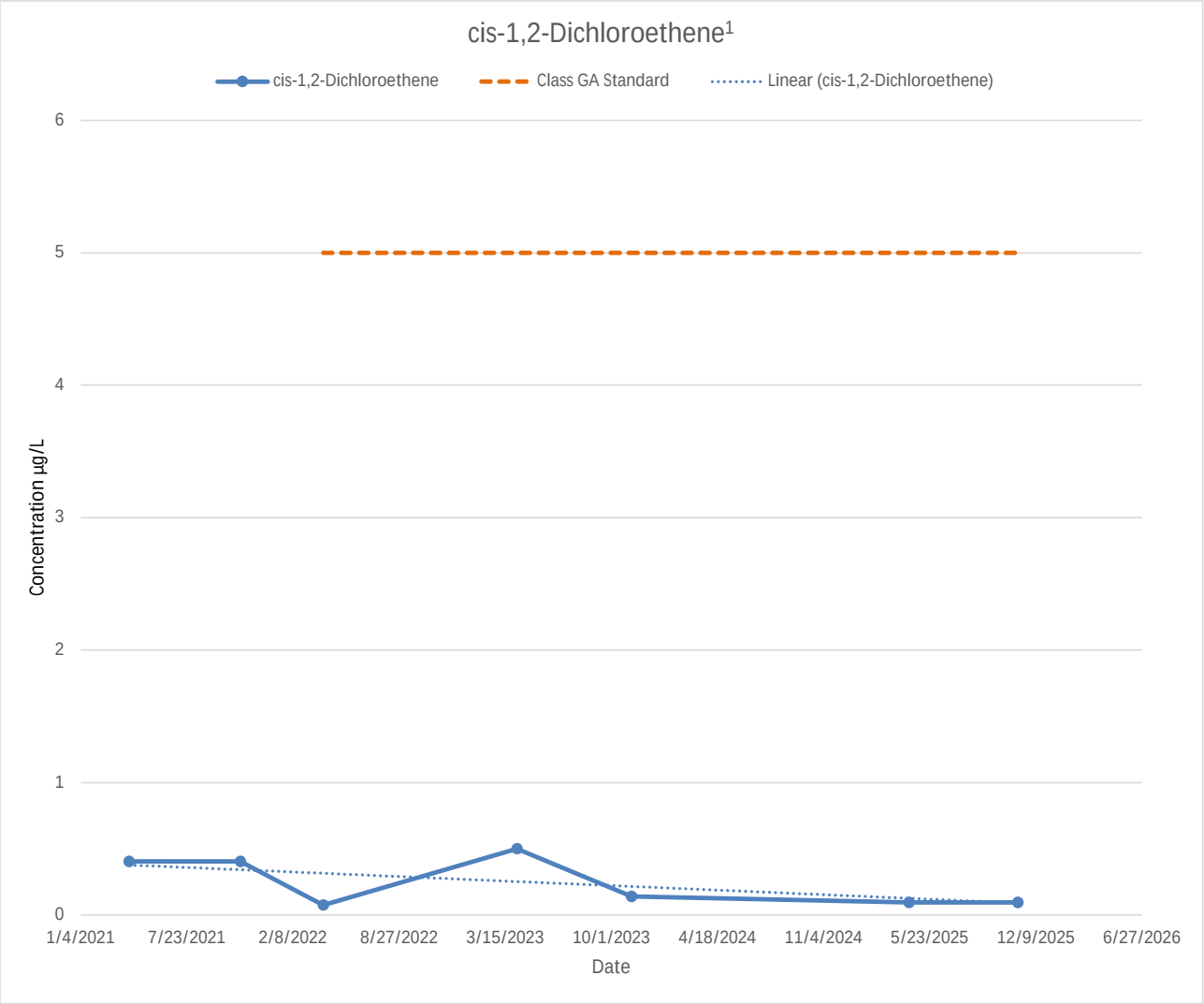
Table 13
MW-23D Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.
2: Based on the discrepancy in total depth measured and analytical data results Benchmark in consultation with the NYSDEC believe GES gauged and sampled MW-23S instead of MW-23D in sample collected on November 9, 2022.



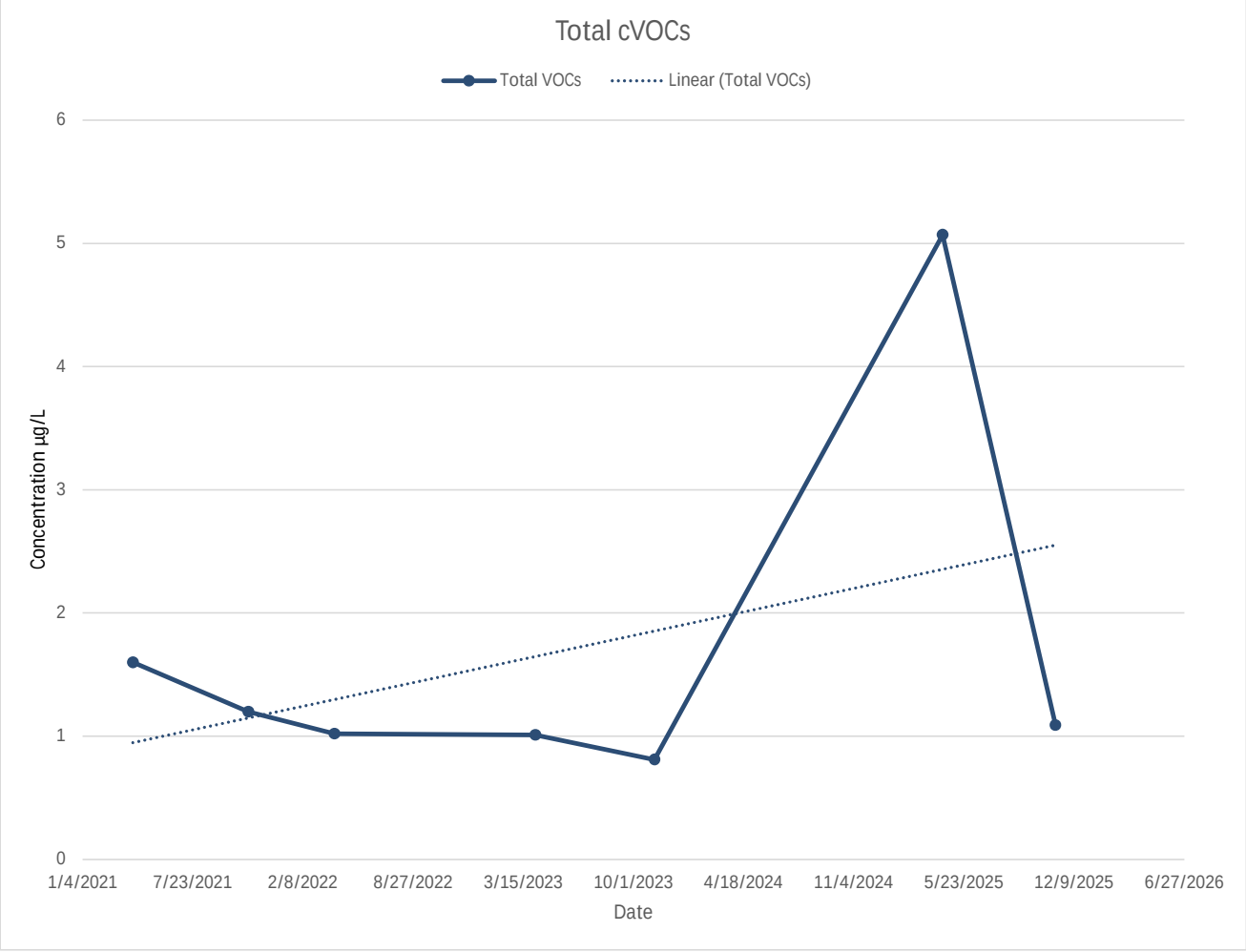
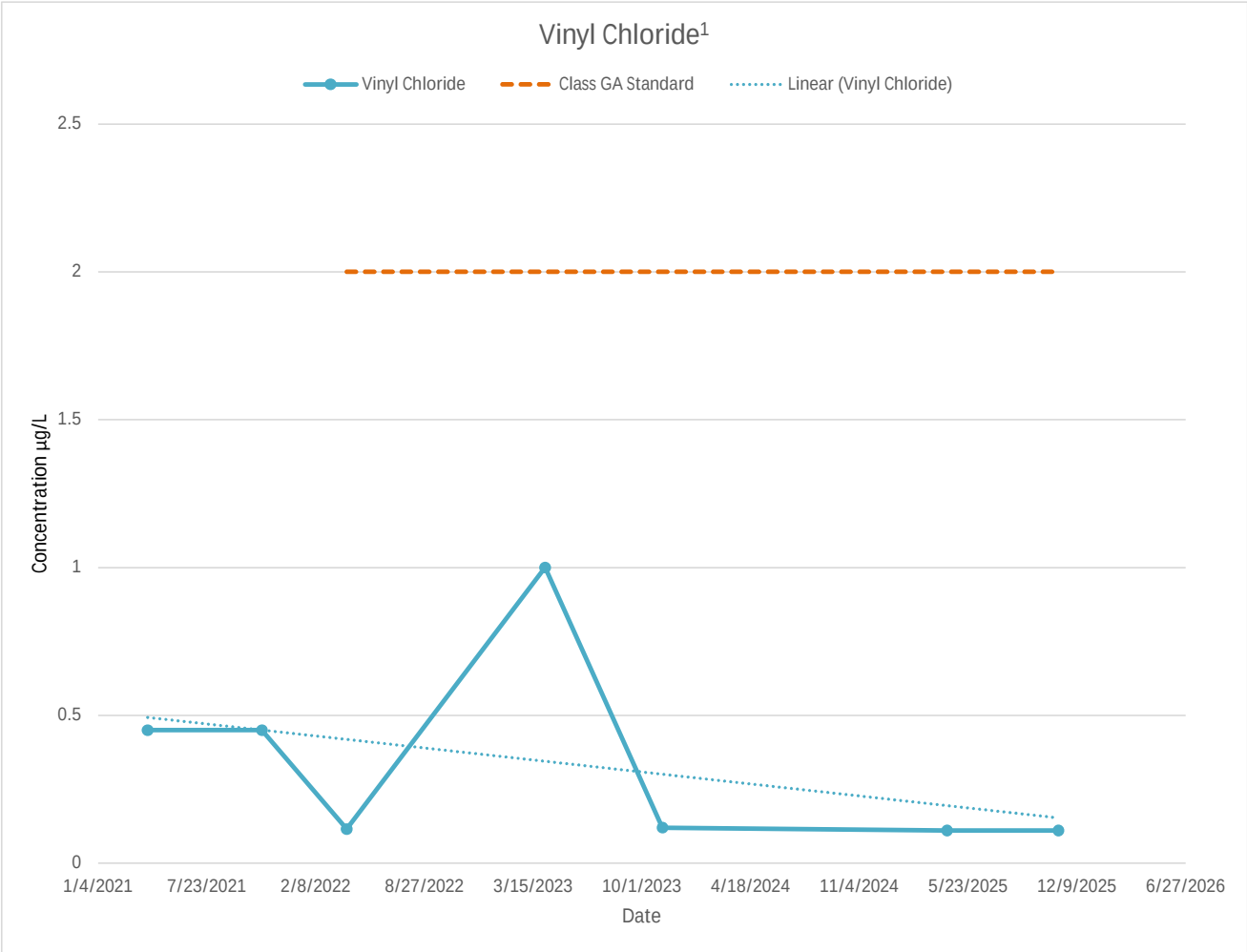
Table 13
MW-23D Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.
2: Based on the discrepancy in total depth measured and analytical data results Benchmark in consultation with the NYSDEC believe GES gauged and sampled MW-23S instead of MW-23D in sample collected on November 9, 2022.



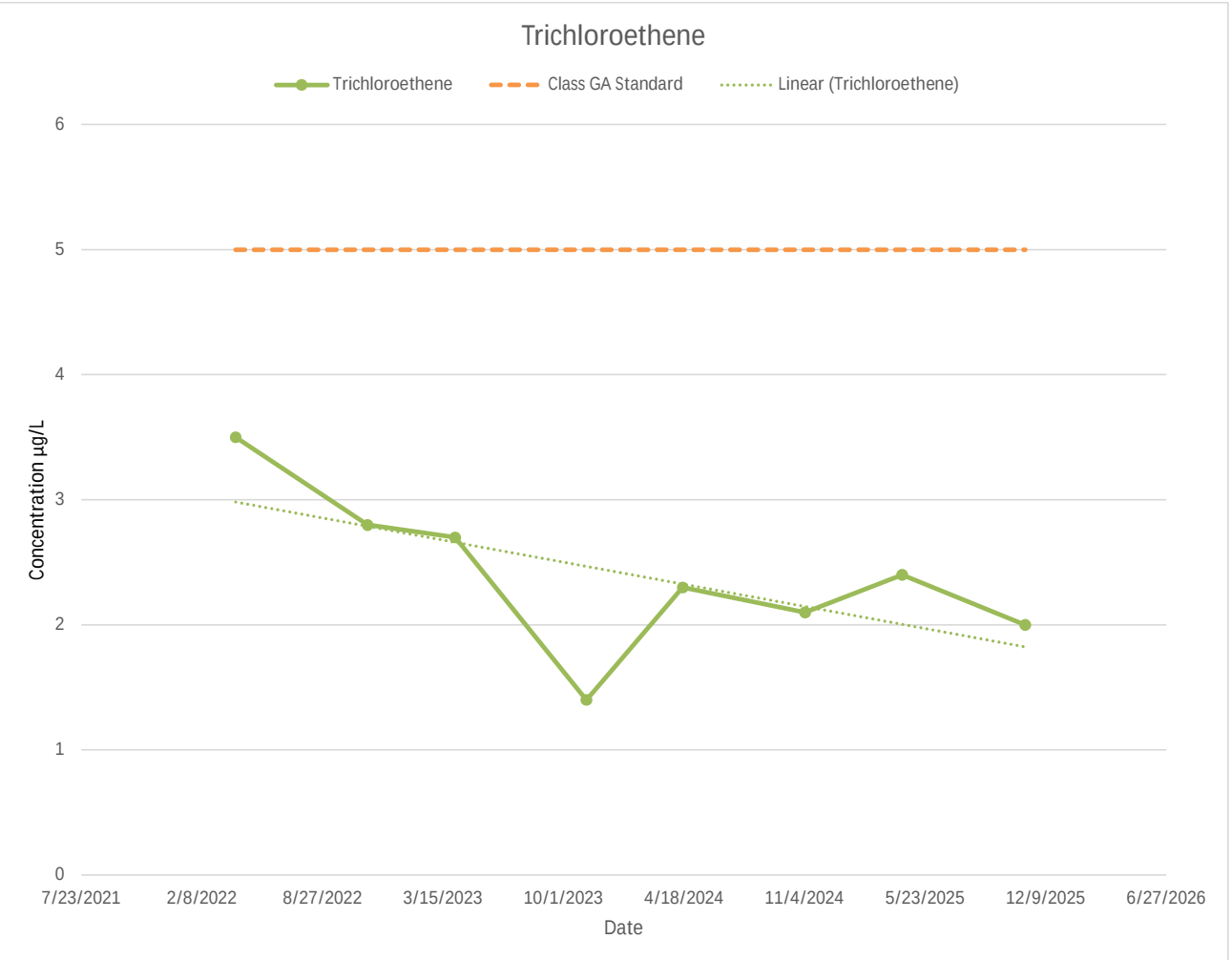
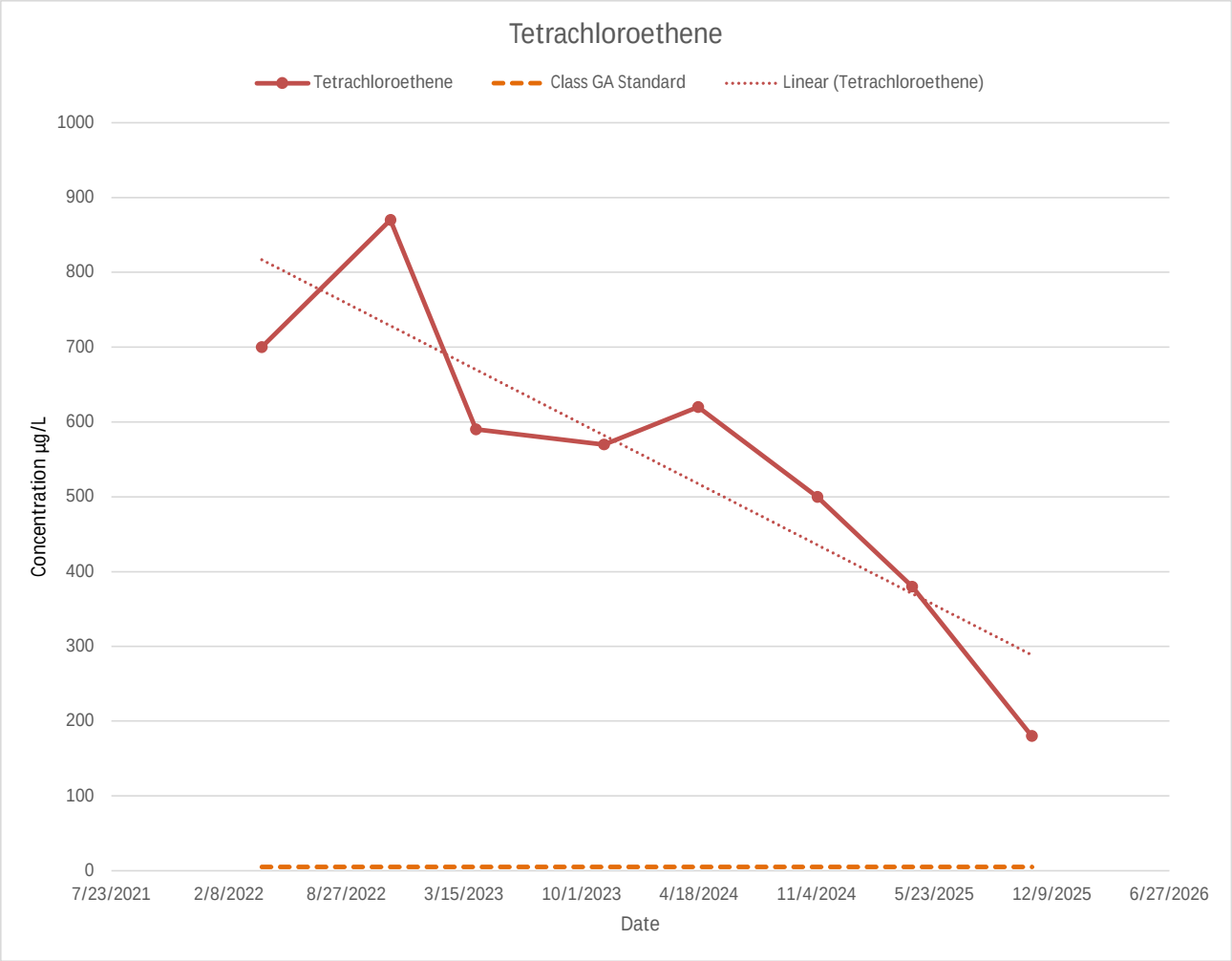
Table 13
MW-23D Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.
2: Based on the discrepancy in total depth measured and analytical data results Benchmark in consultation with the NYSDEC believe GES gauged and sampled MW-23S instead of MW-23D in sample collected on November 9, 2022.



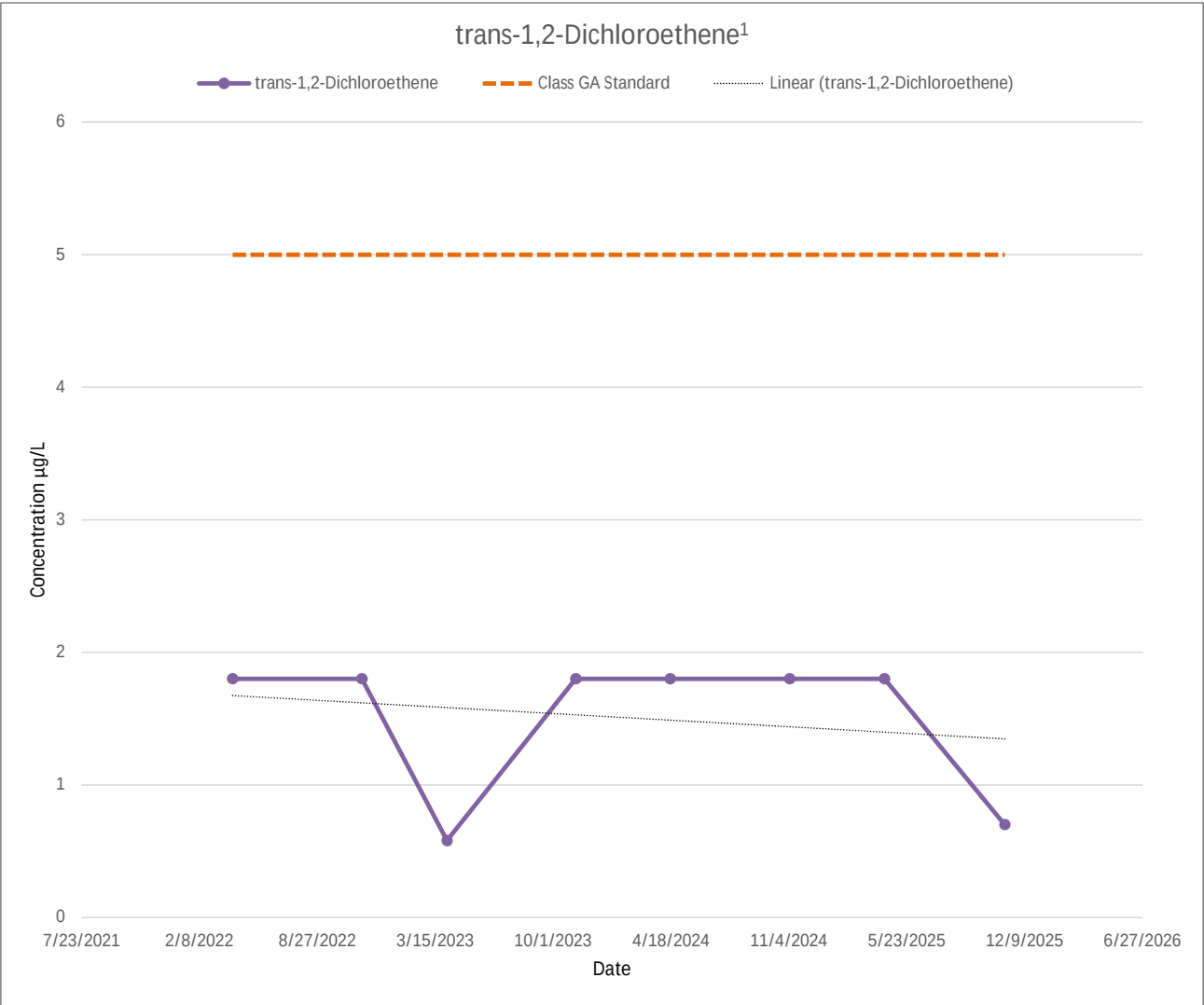
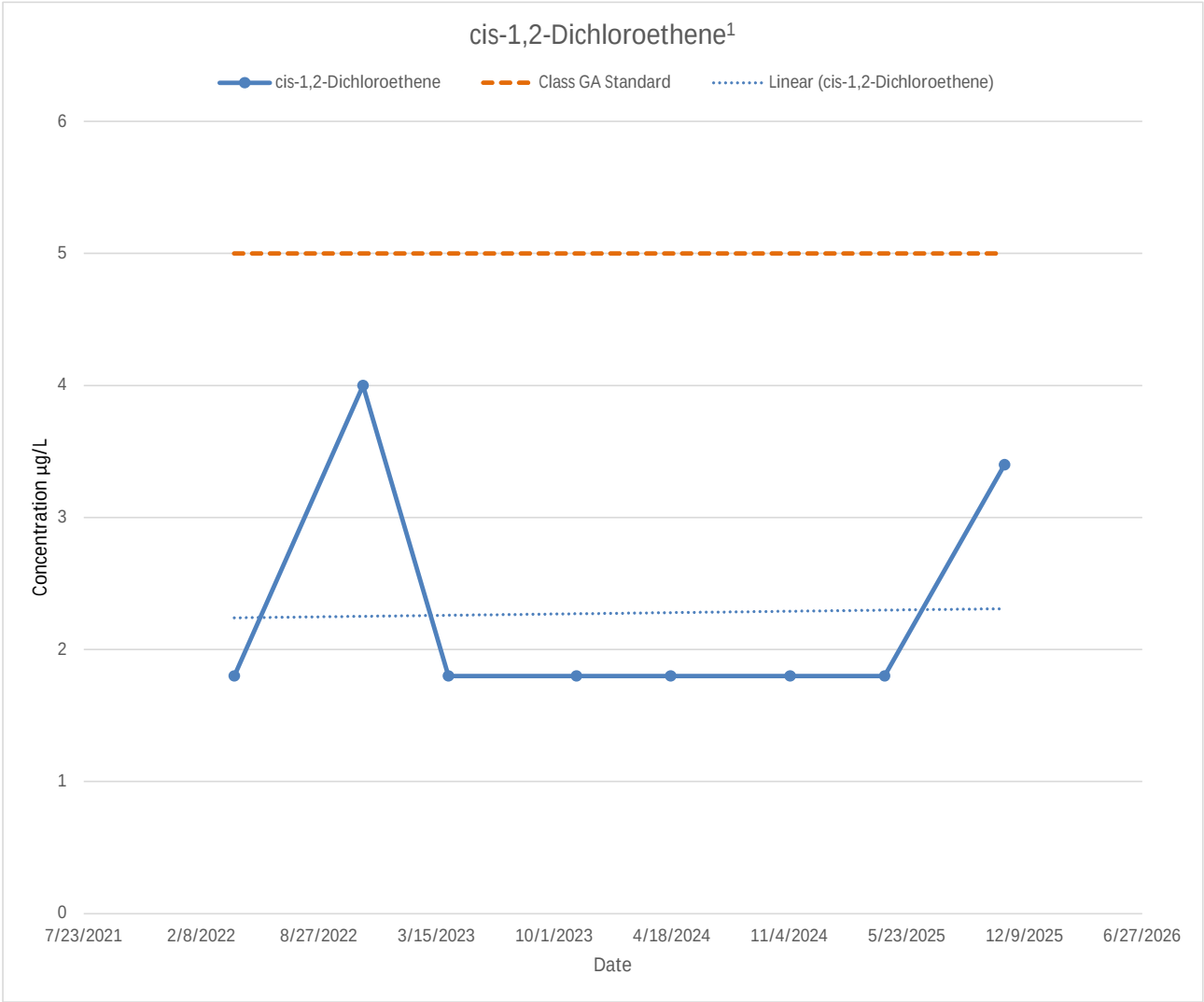
Table 14
MW-23S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



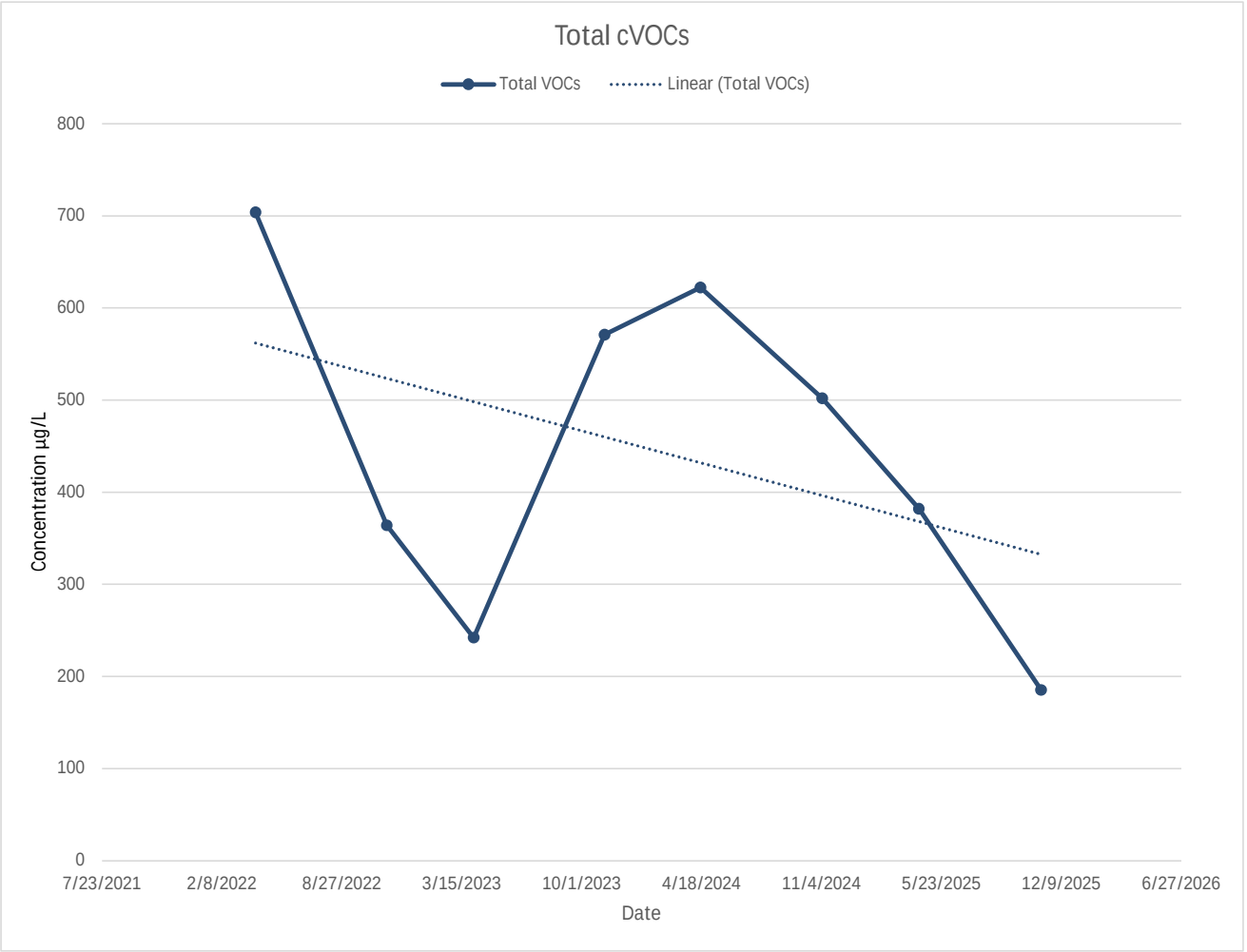
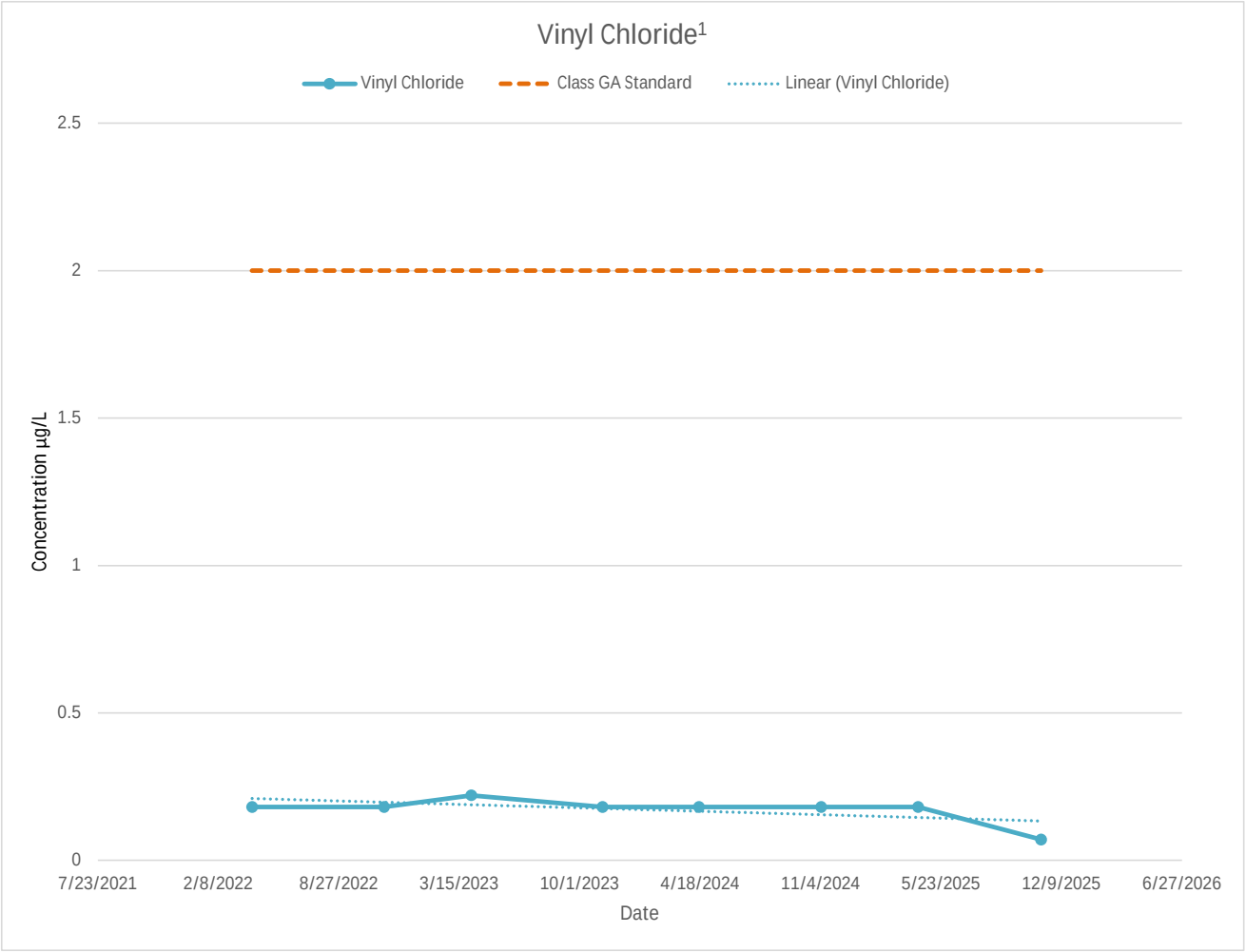
Table 14
MW-23S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



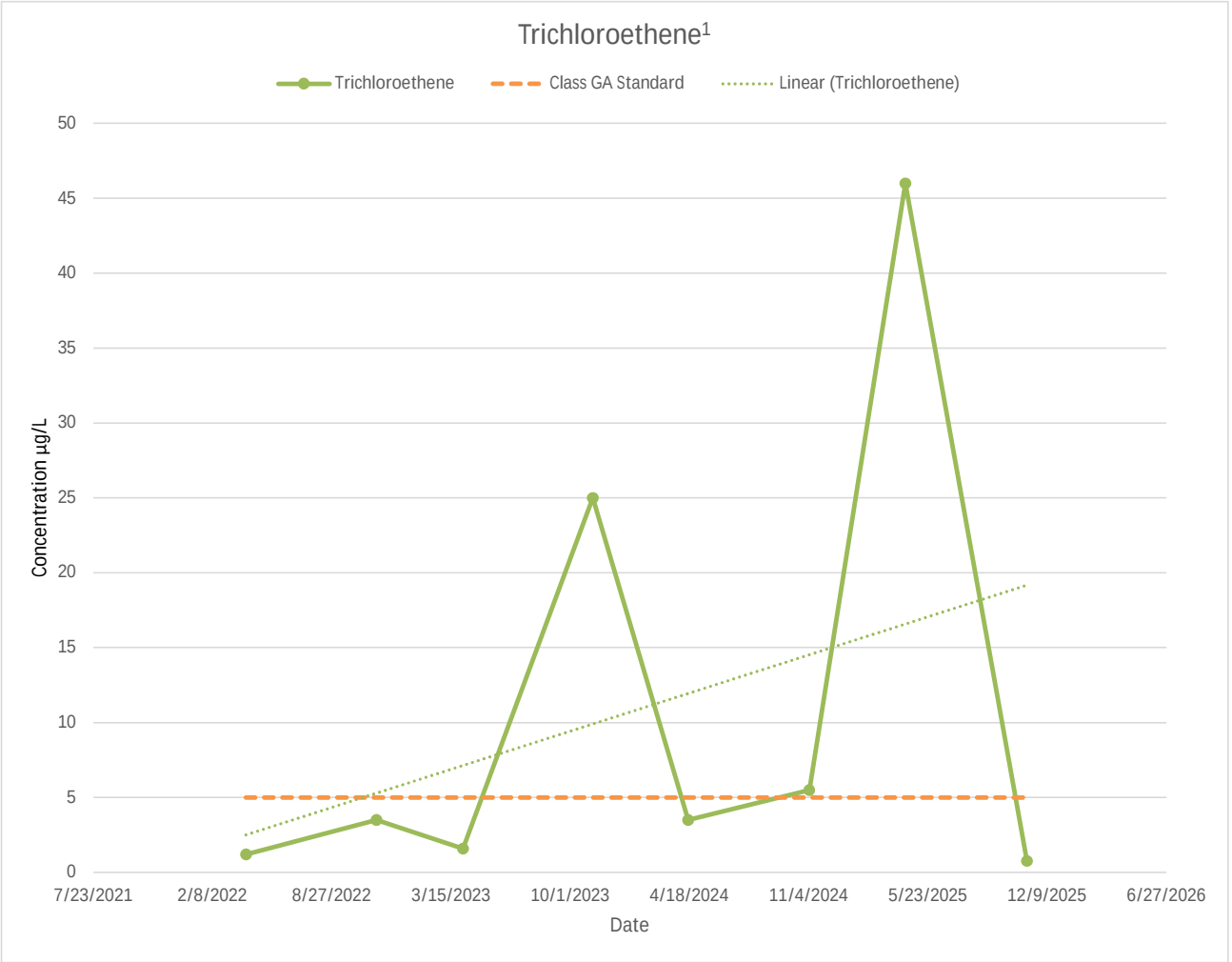
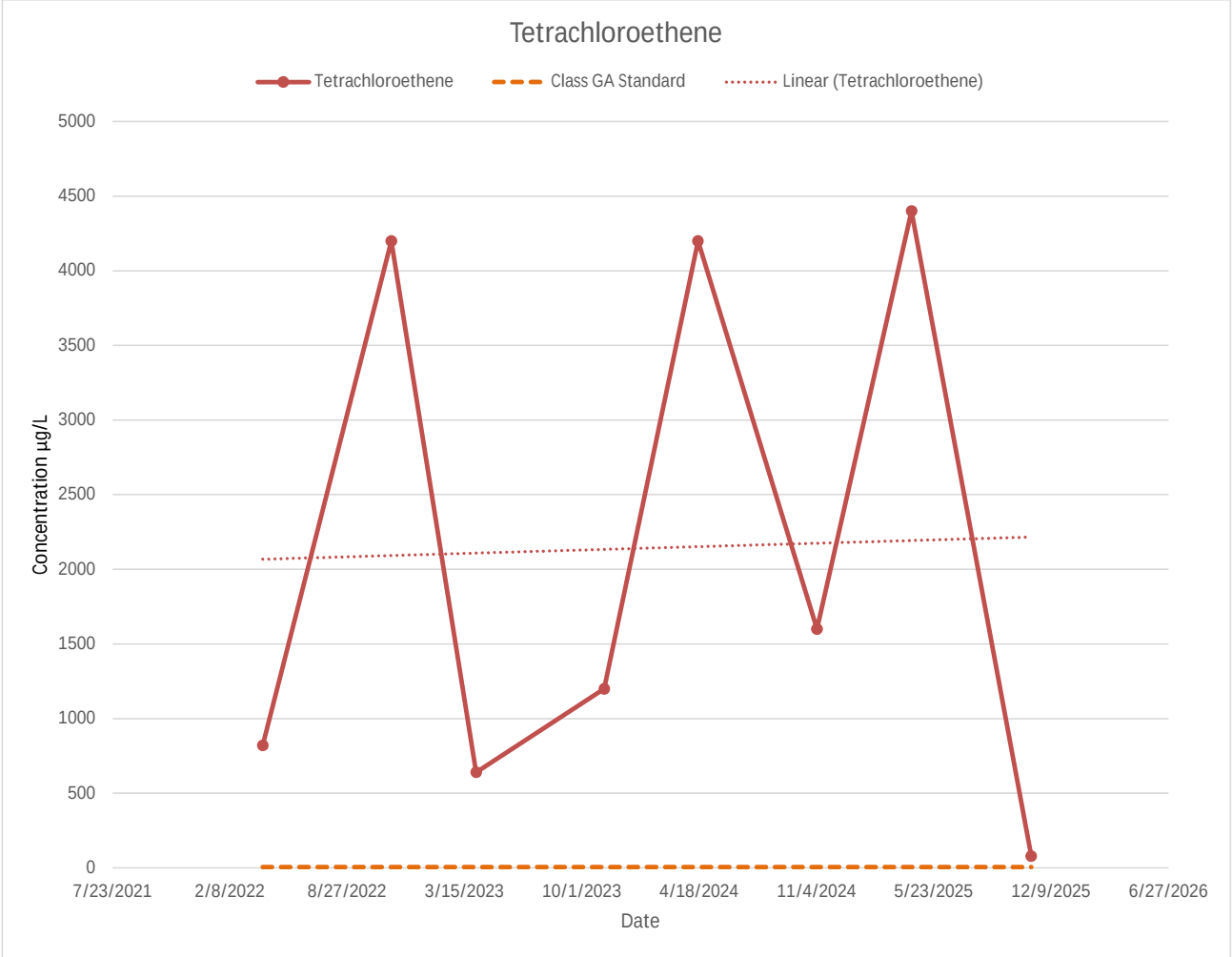
Table 14
MW-23S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



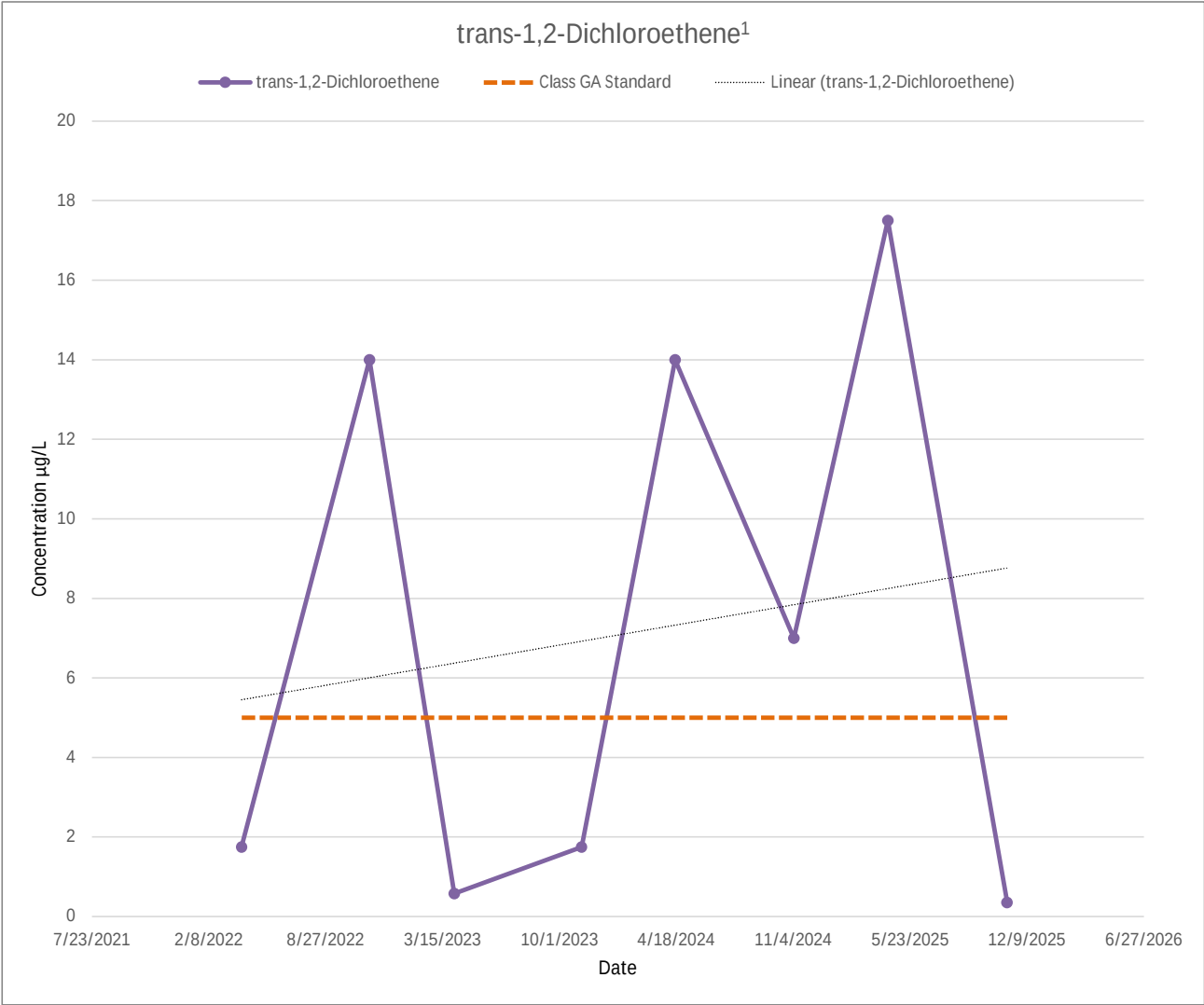
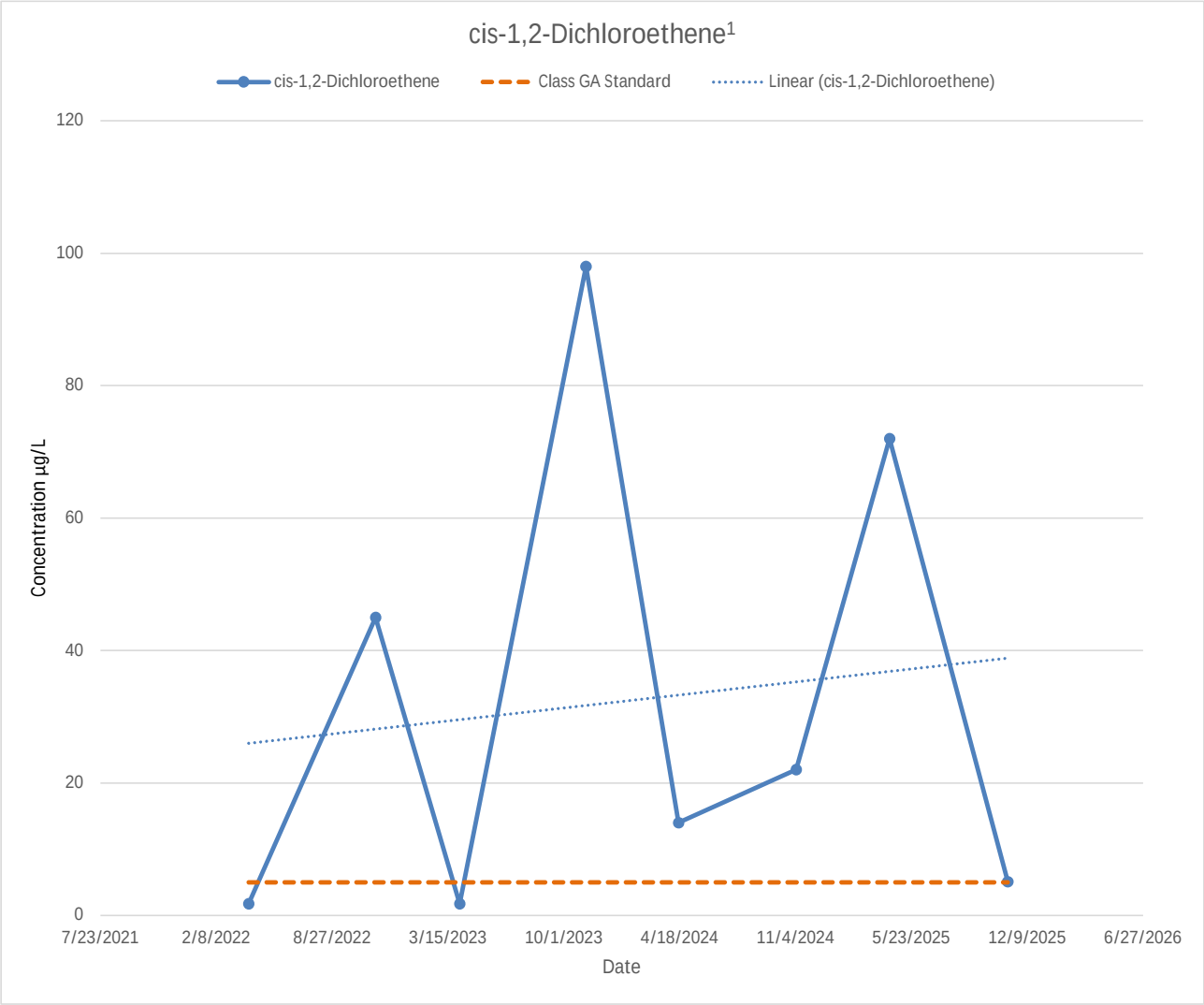
Table 16
MW-24S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



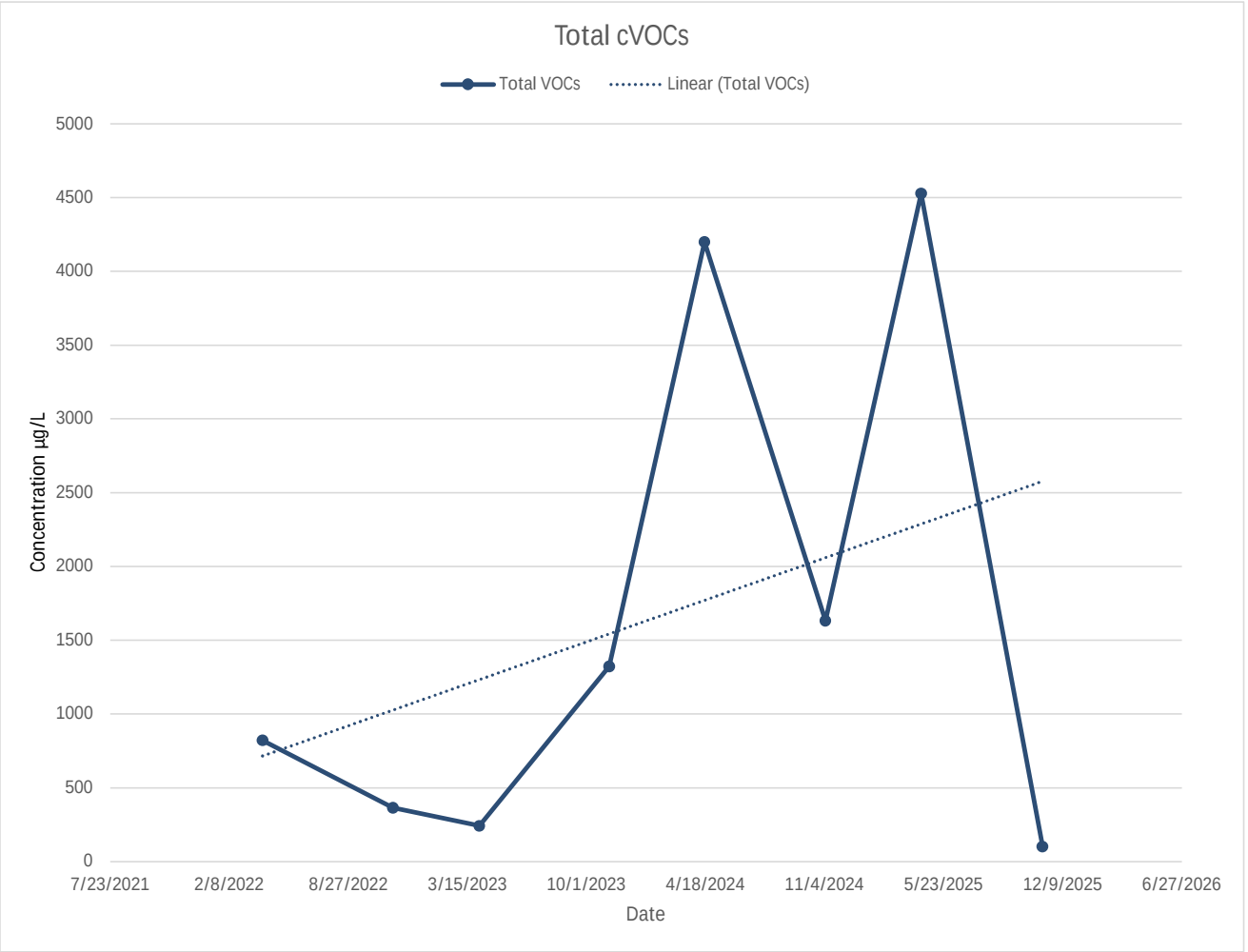
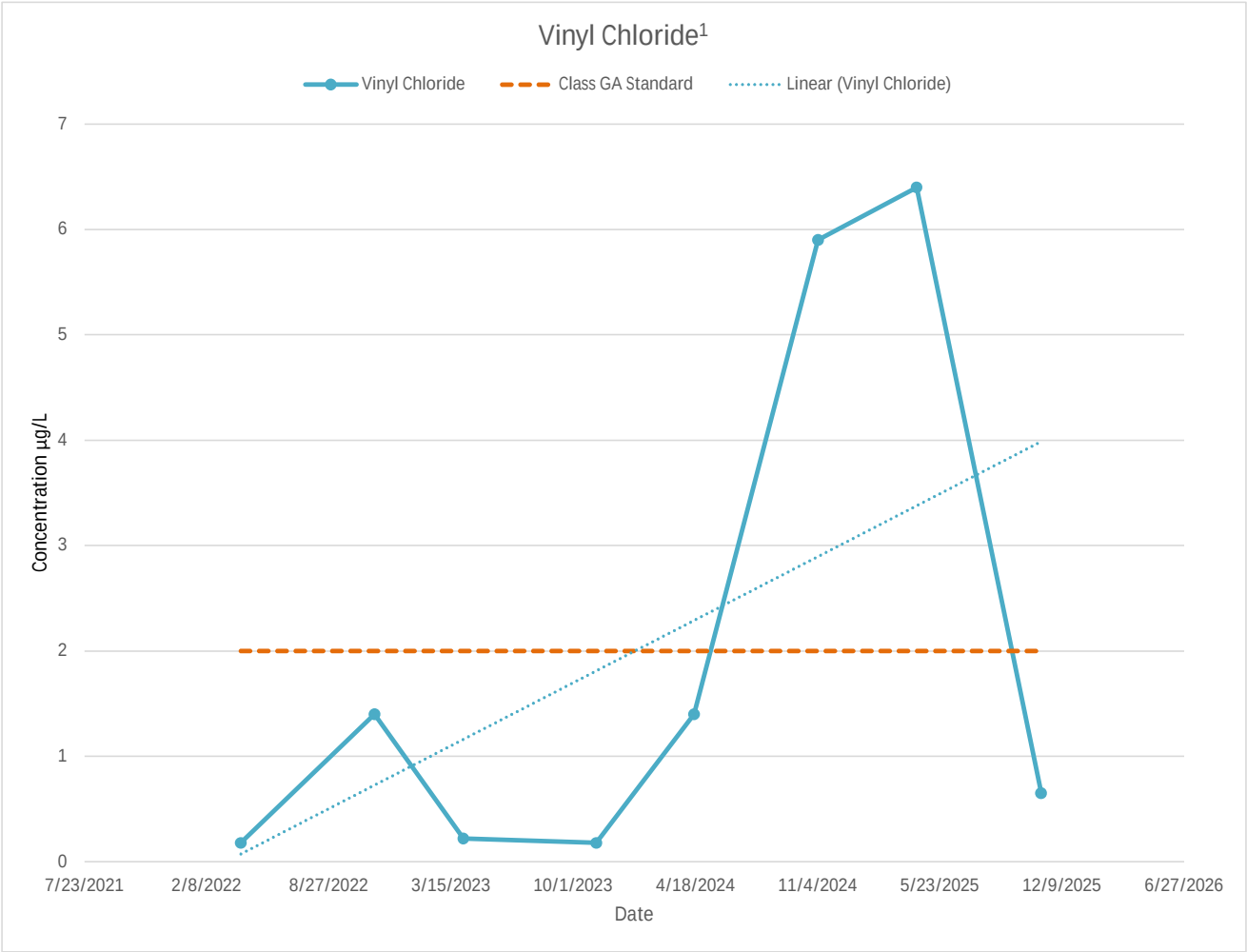
Table 16
MW-24S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



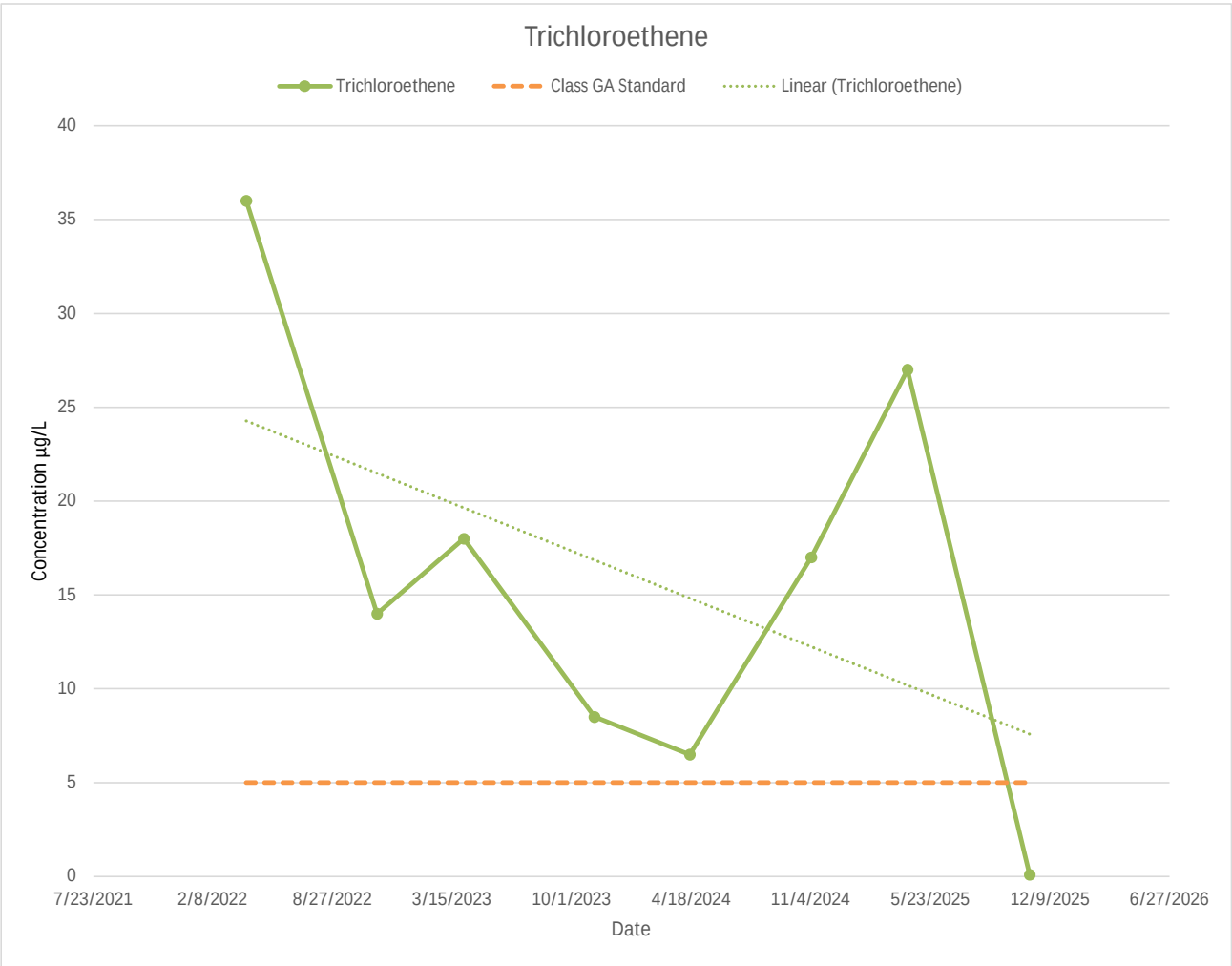
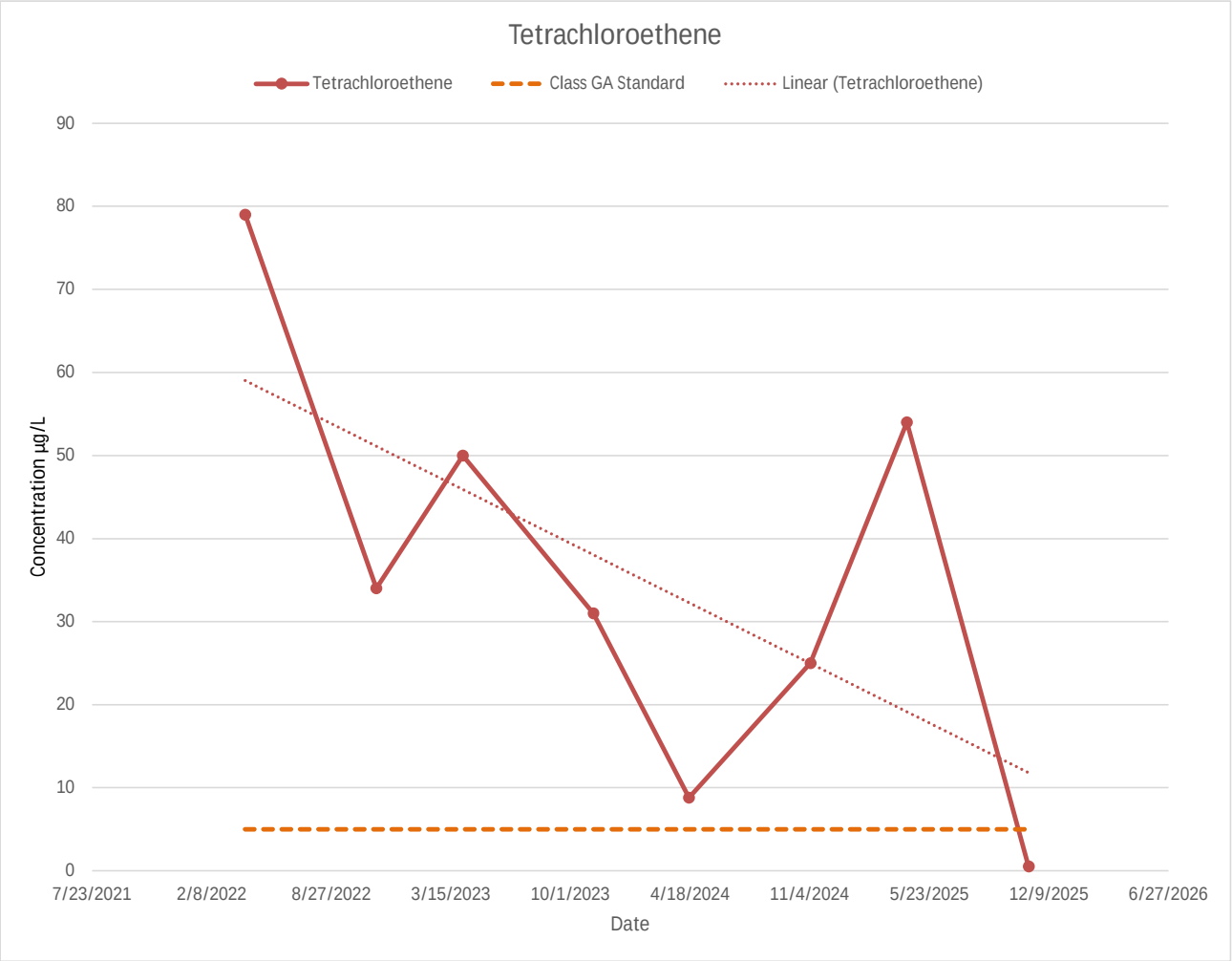
Table 16
MW-24S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



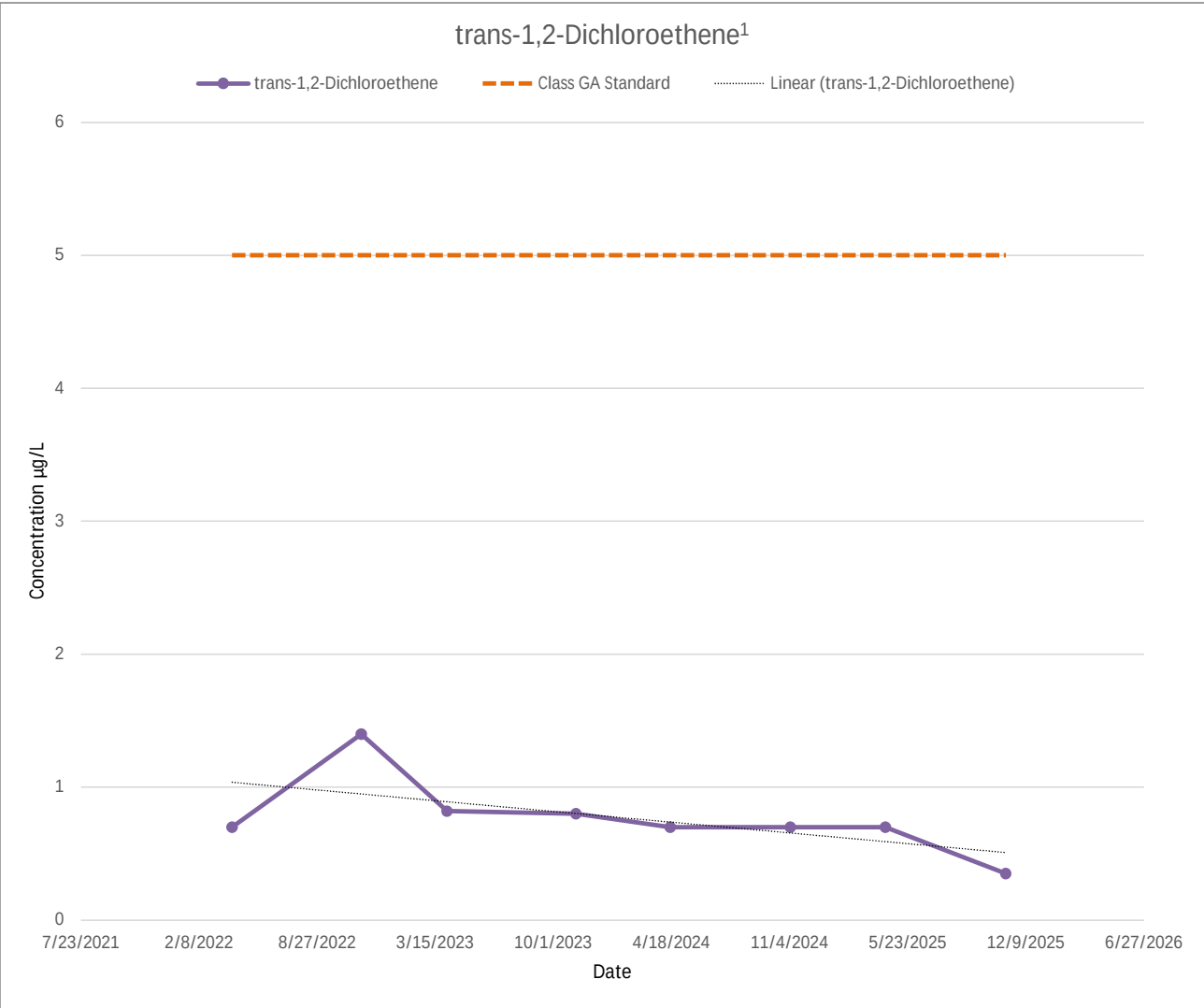
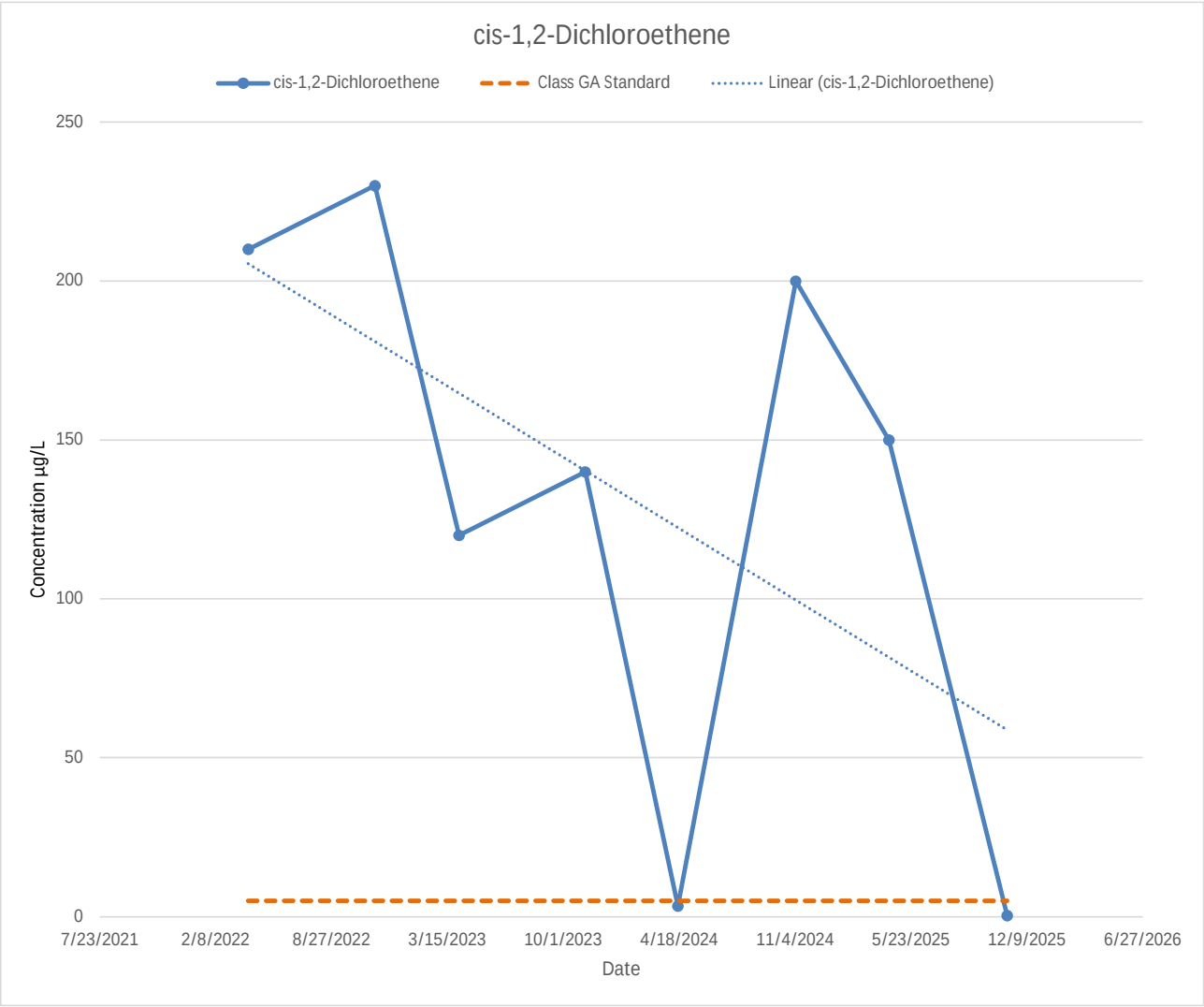
Table 15
MW-24D Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



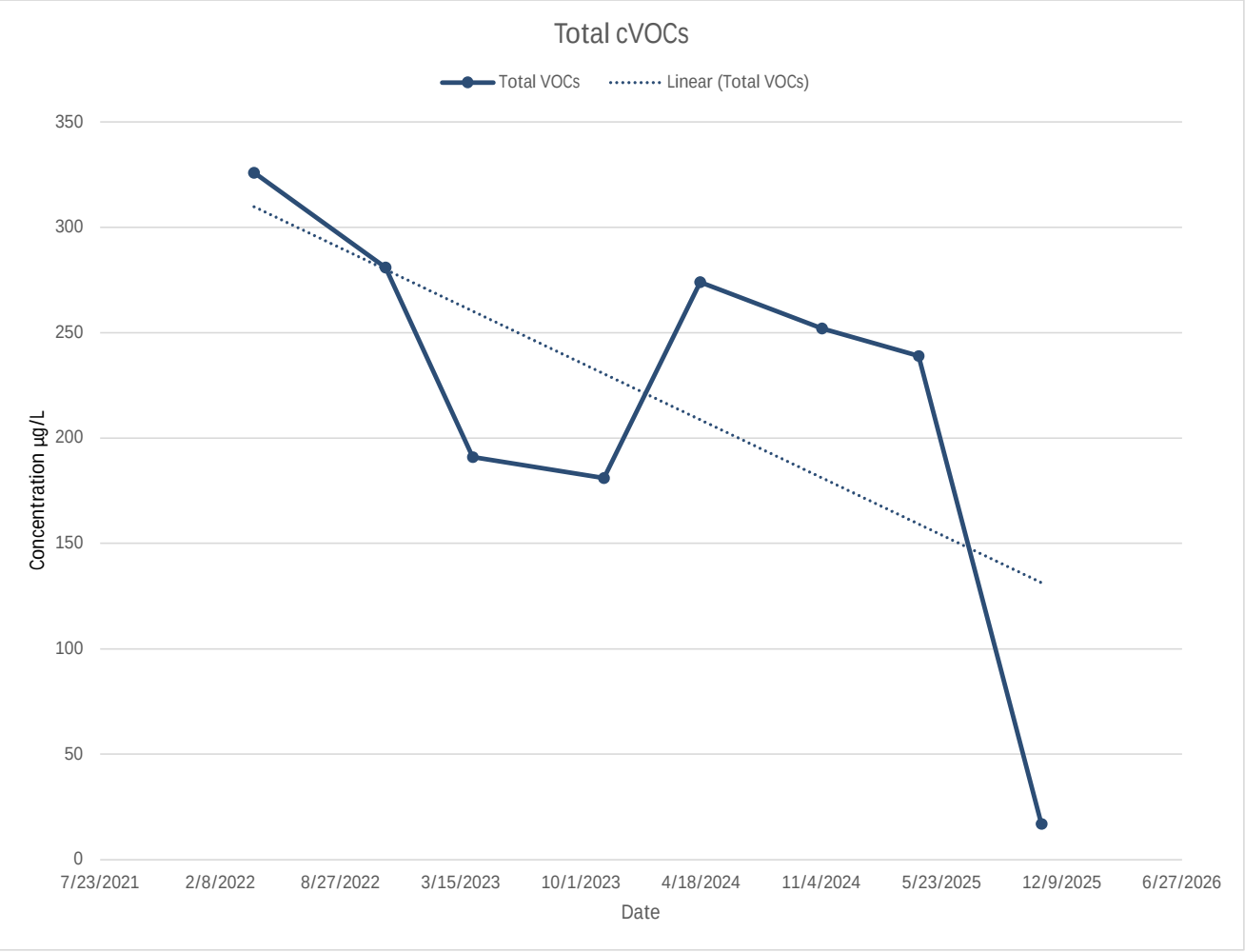
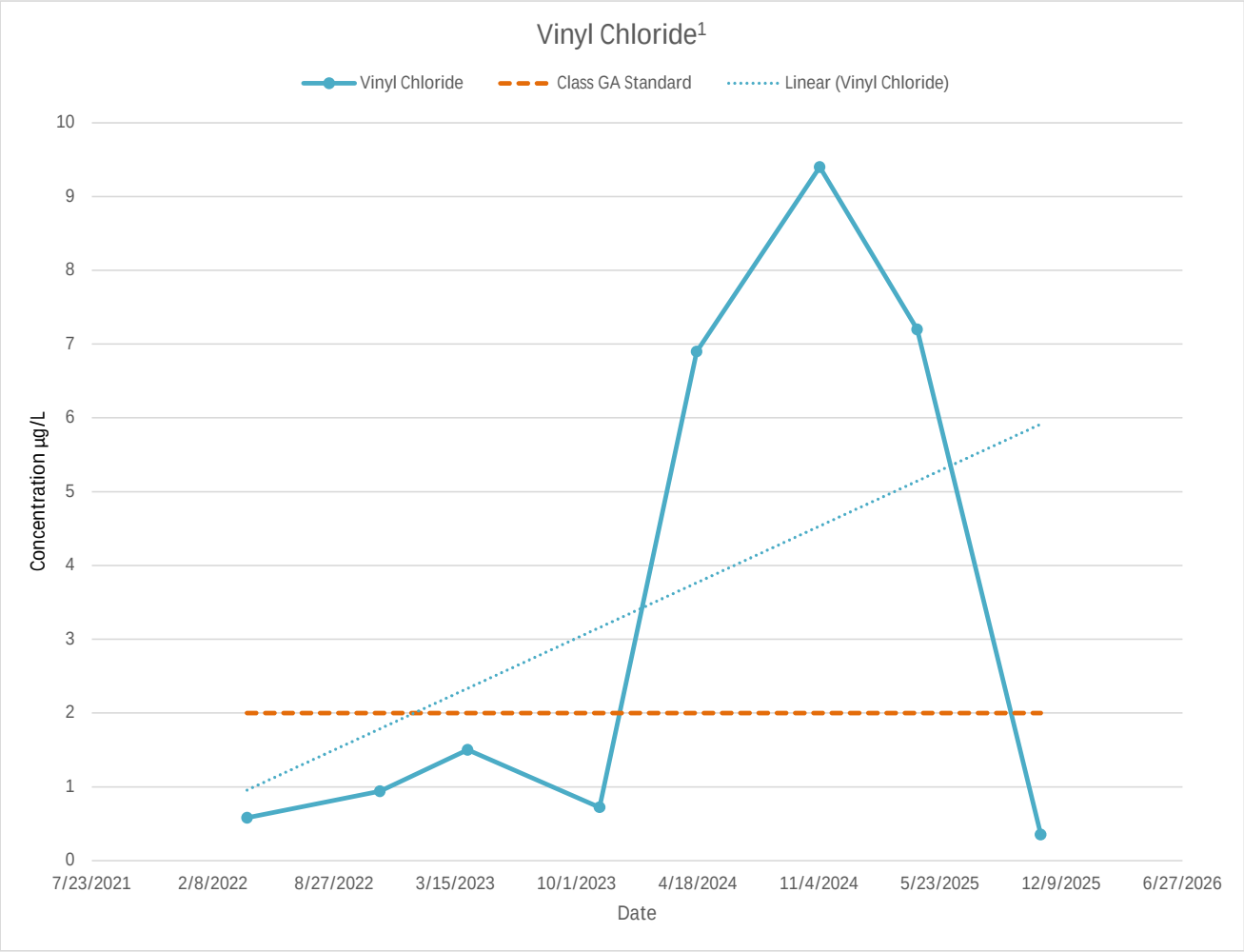
Table 15
MW-24D Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



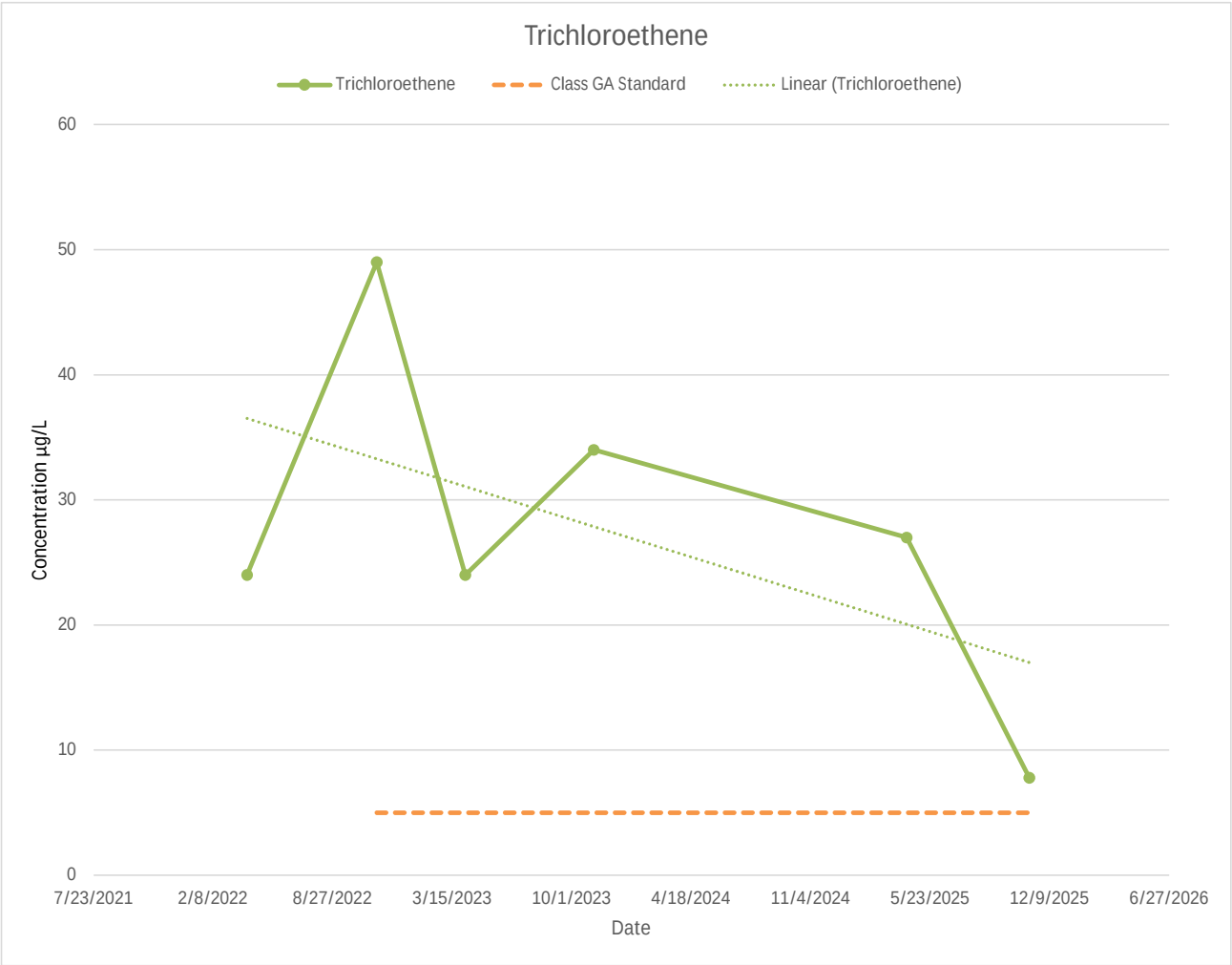
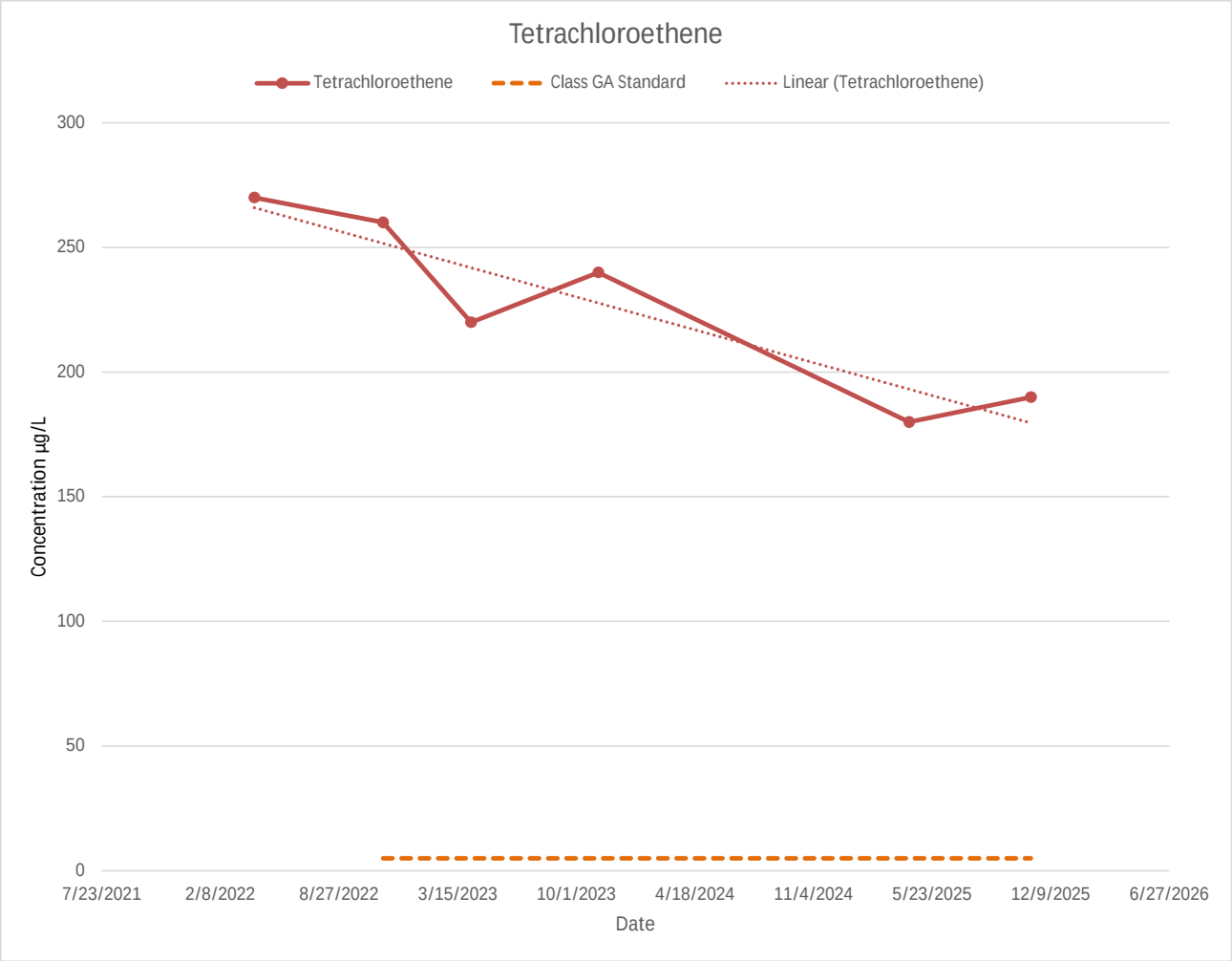
Table 15
MW-24D Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



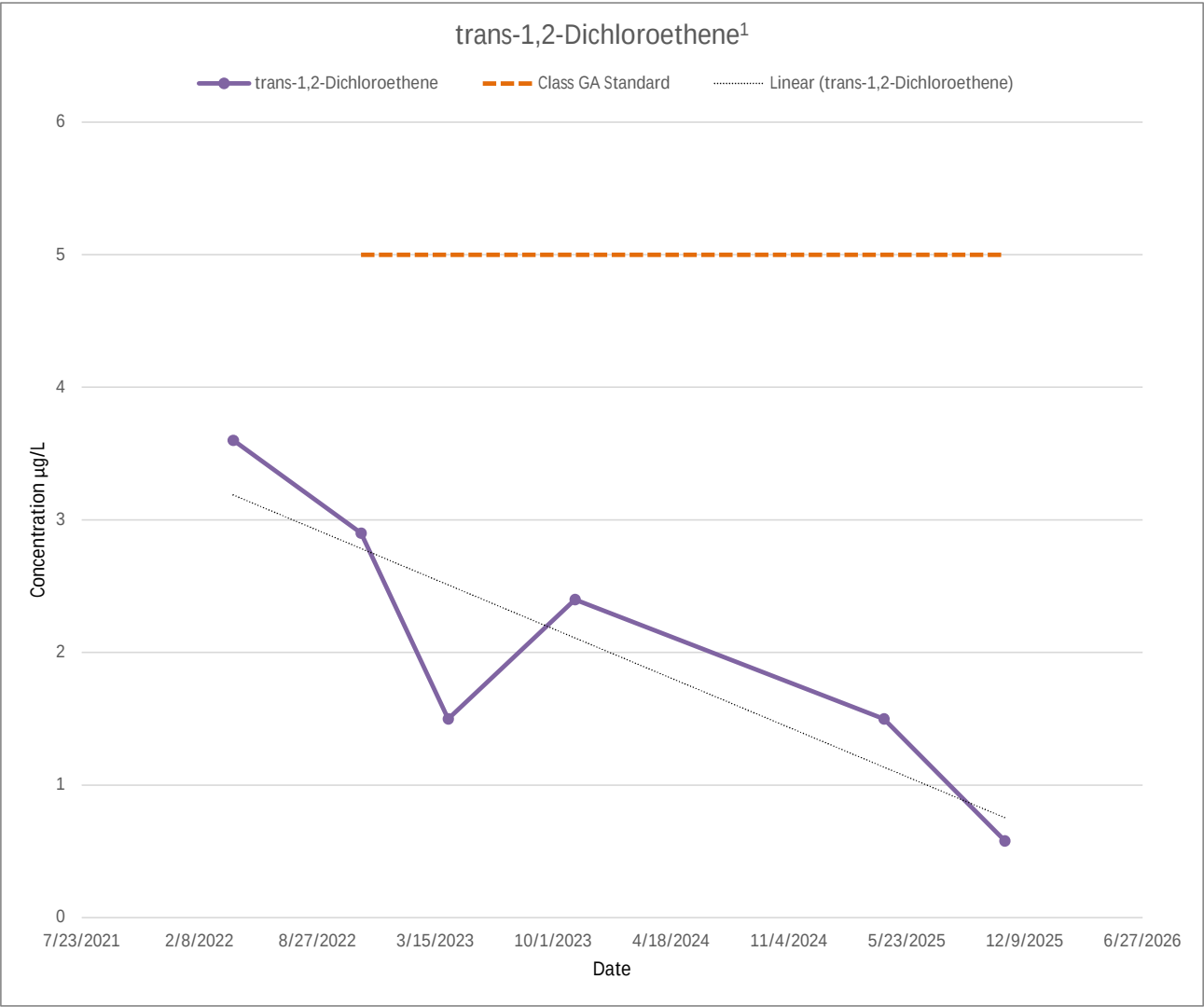
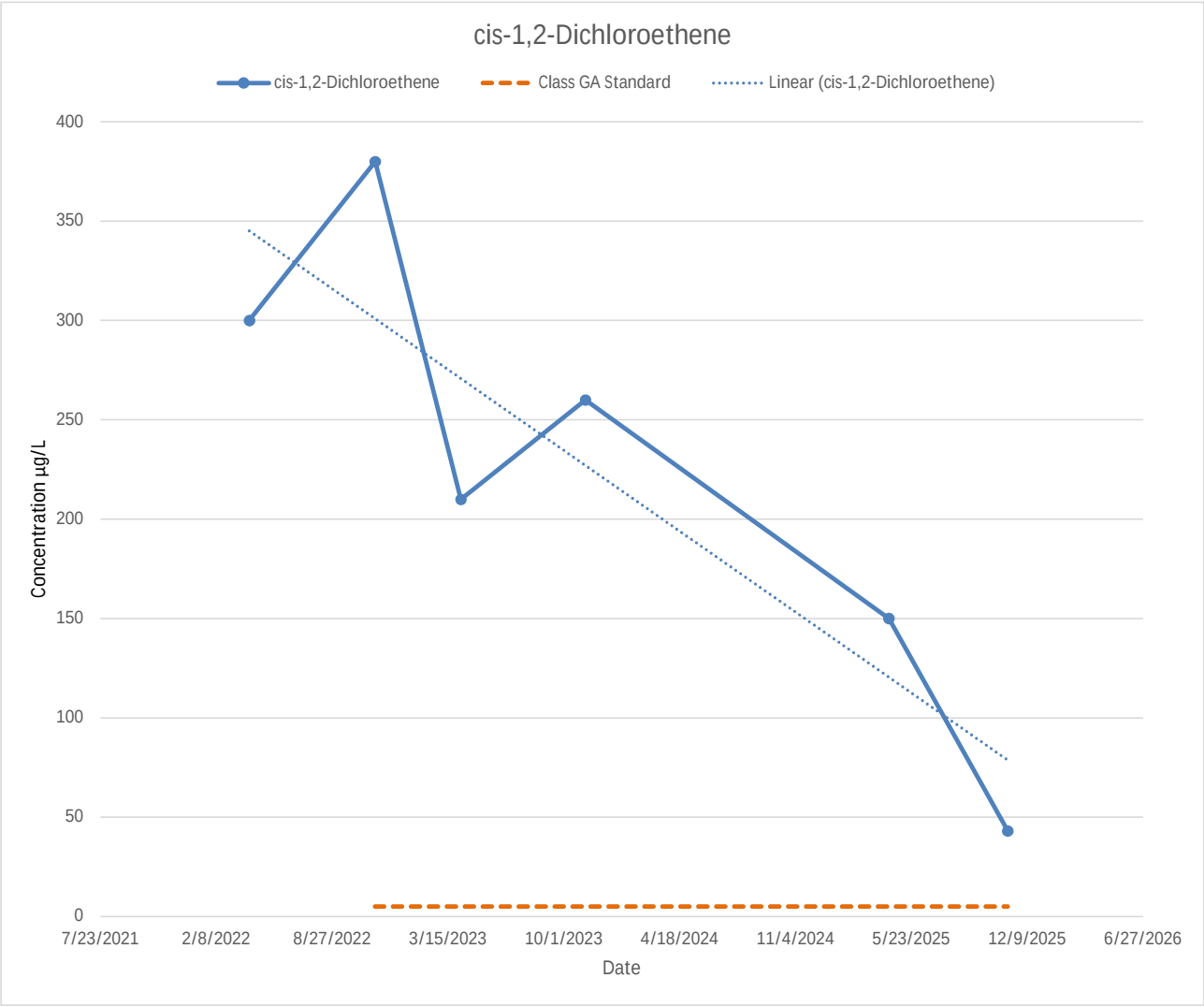
Table 17
MW-25S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



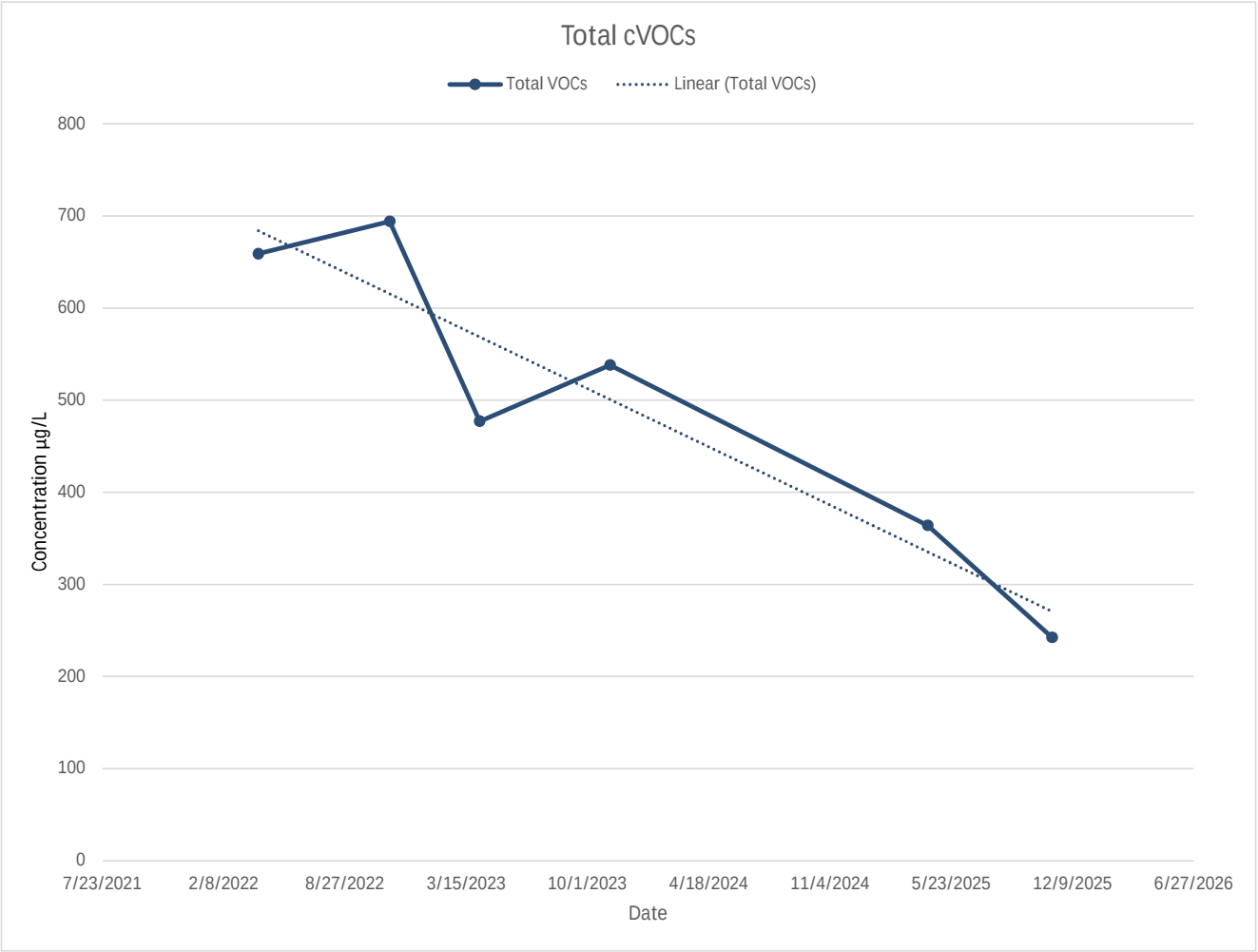
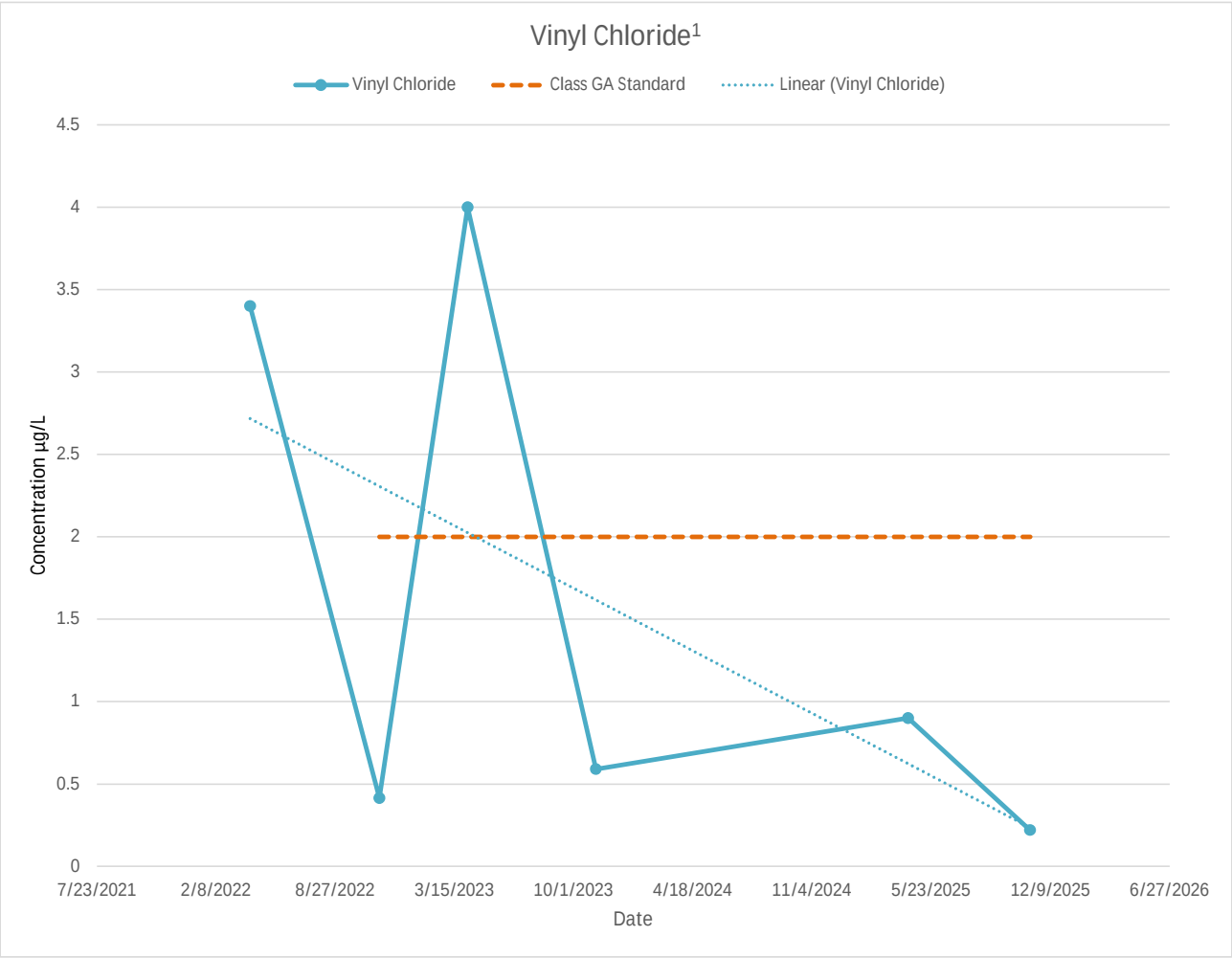
Table 17
MW-25S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



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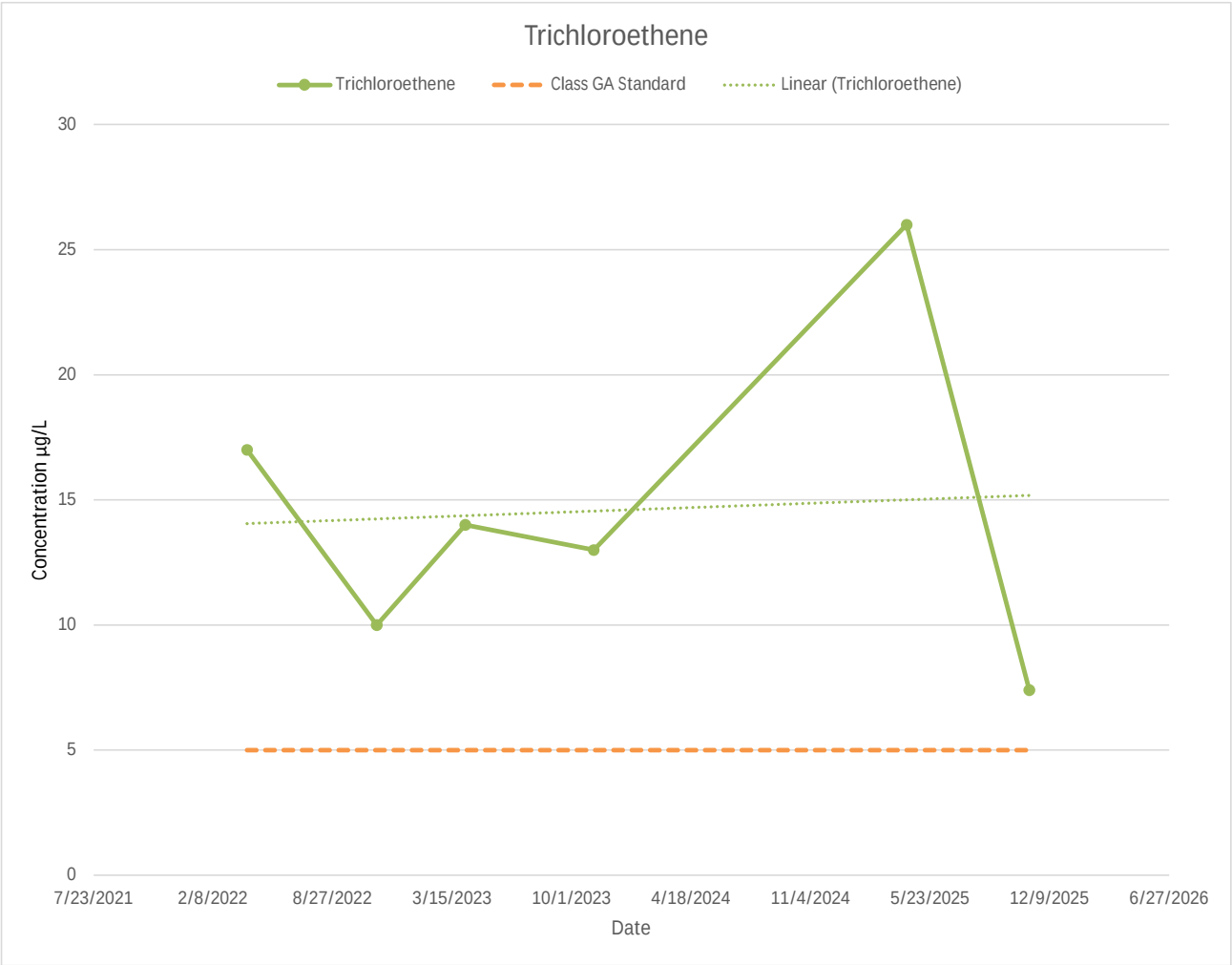
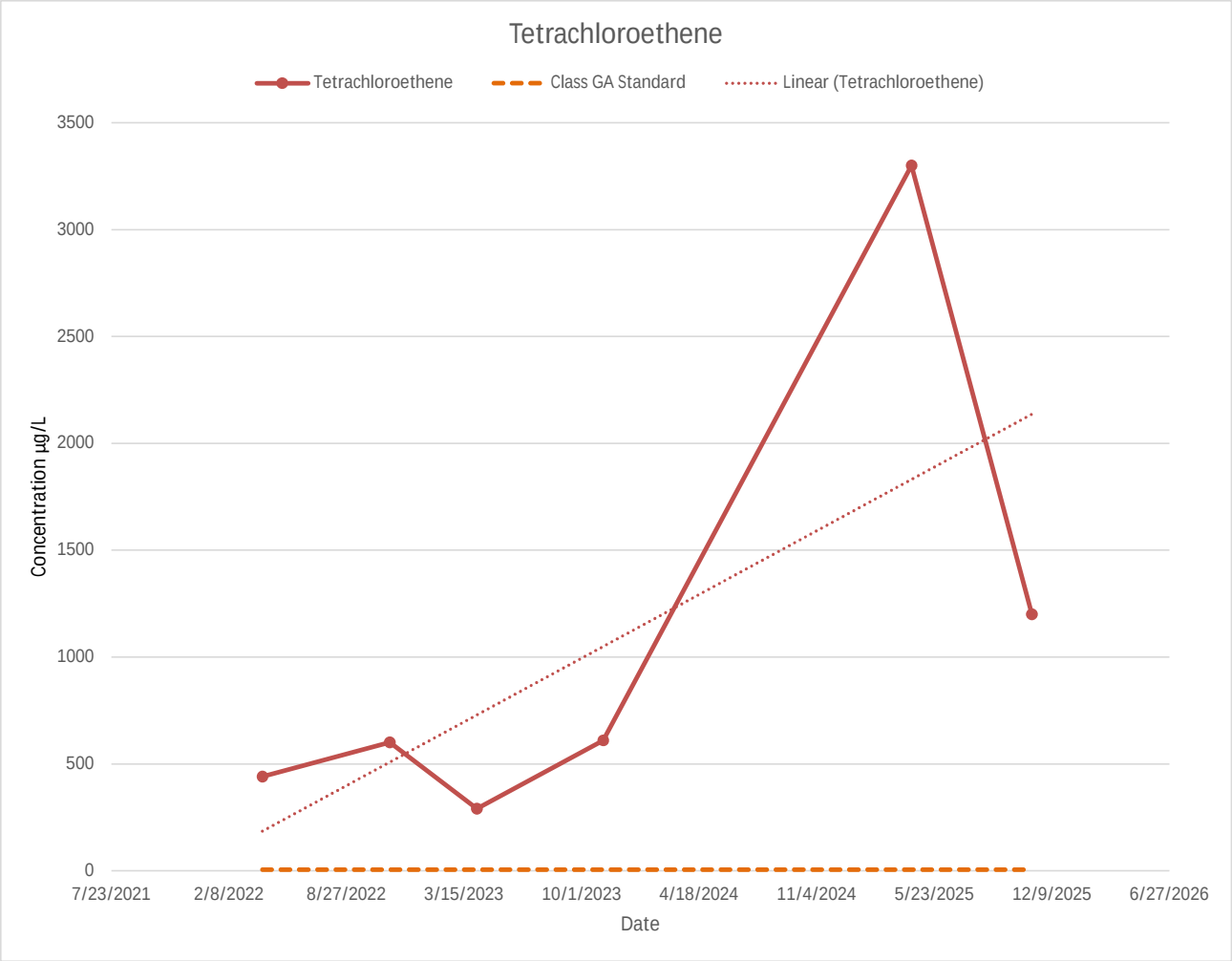
Table 17
MW-25S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



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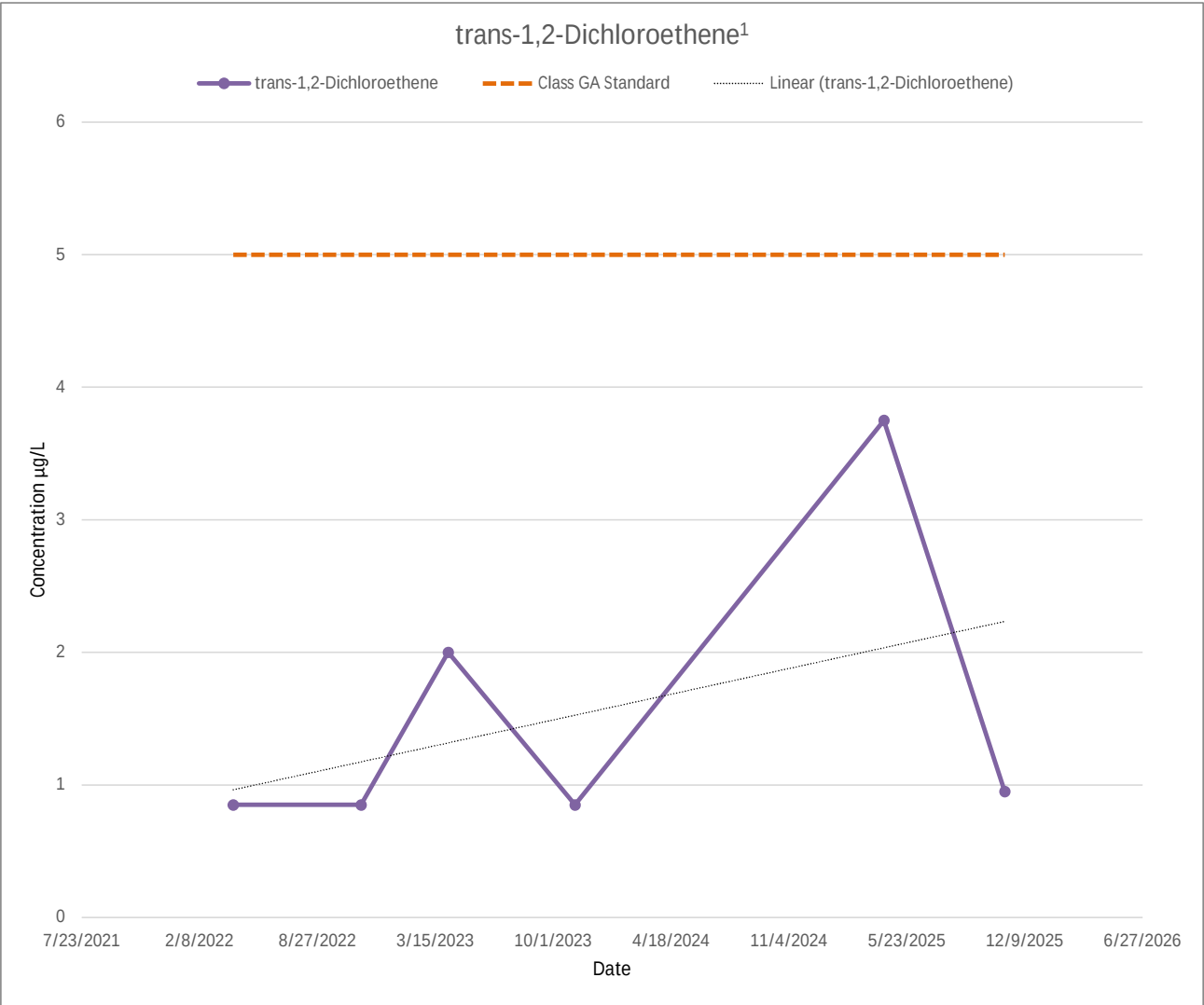
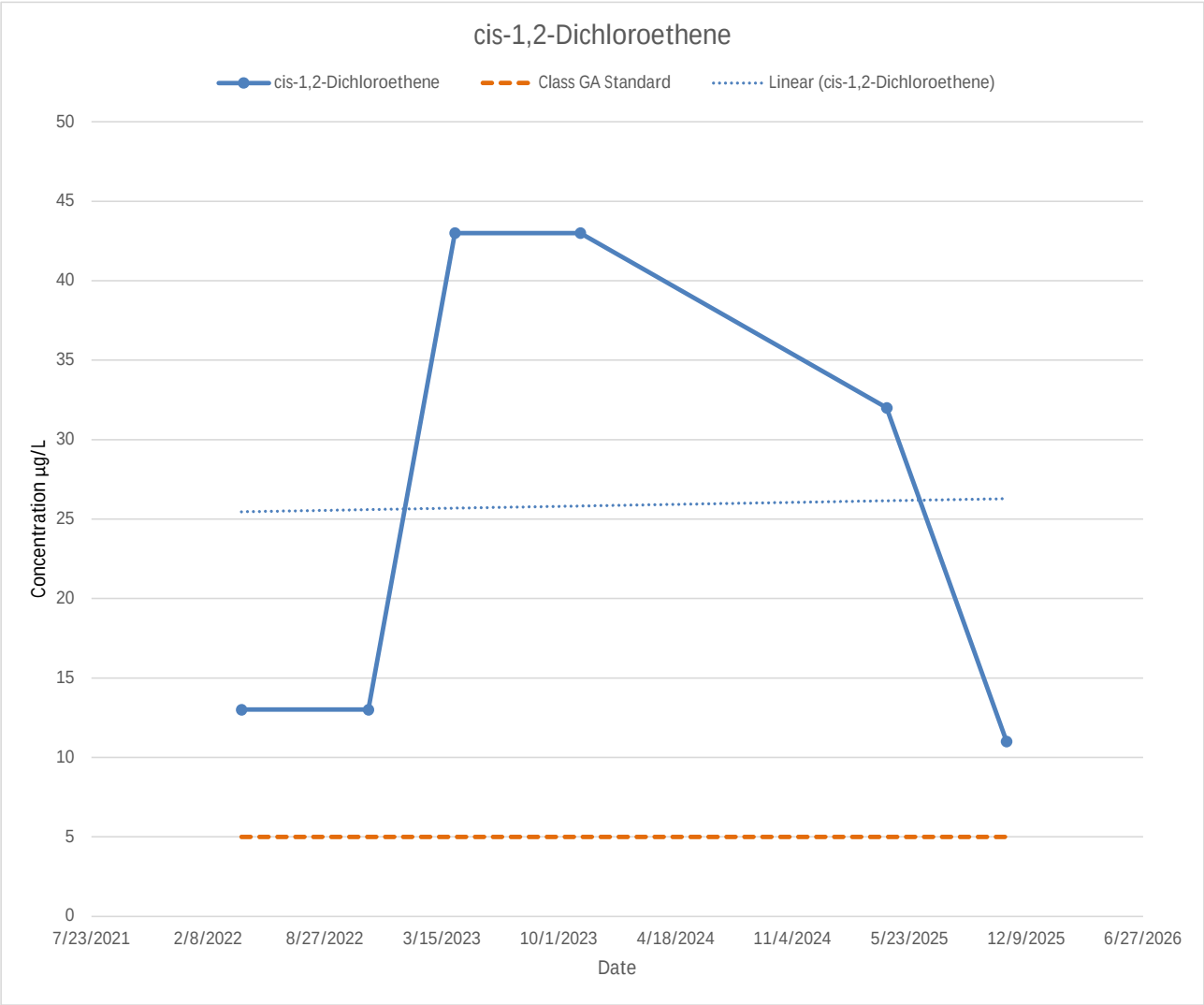
Table 18
MW-26S Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



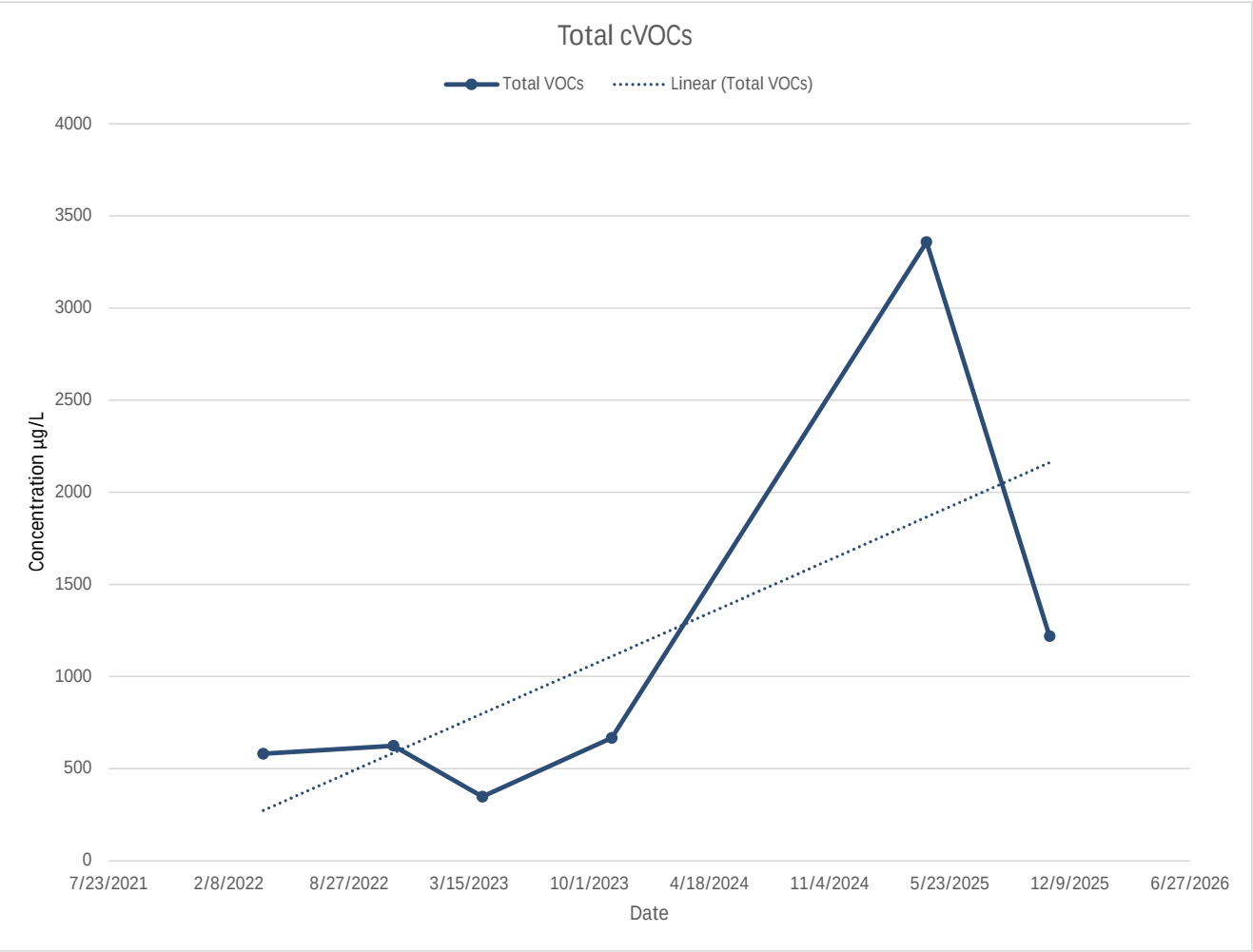
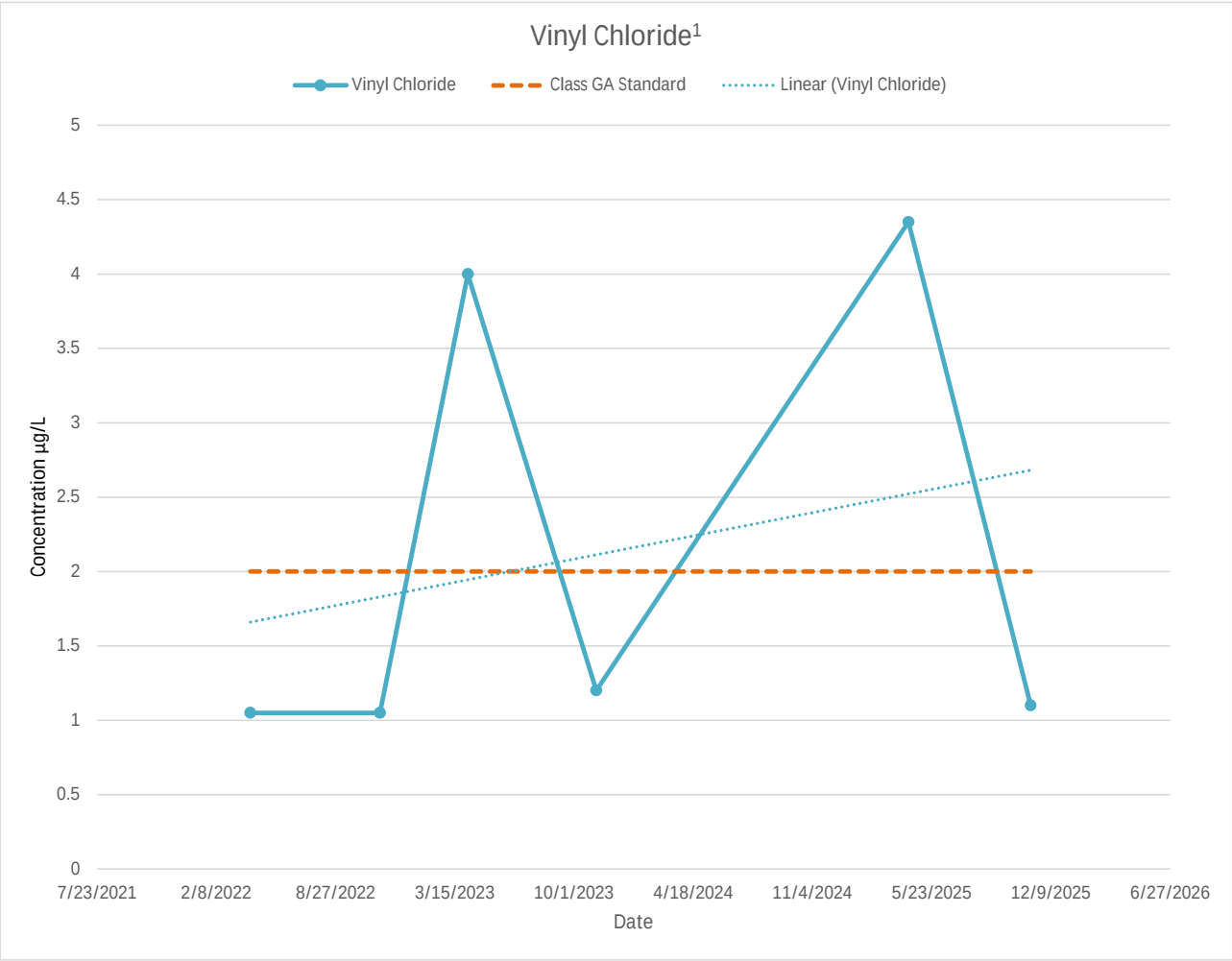
Table 18
MW-26S Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



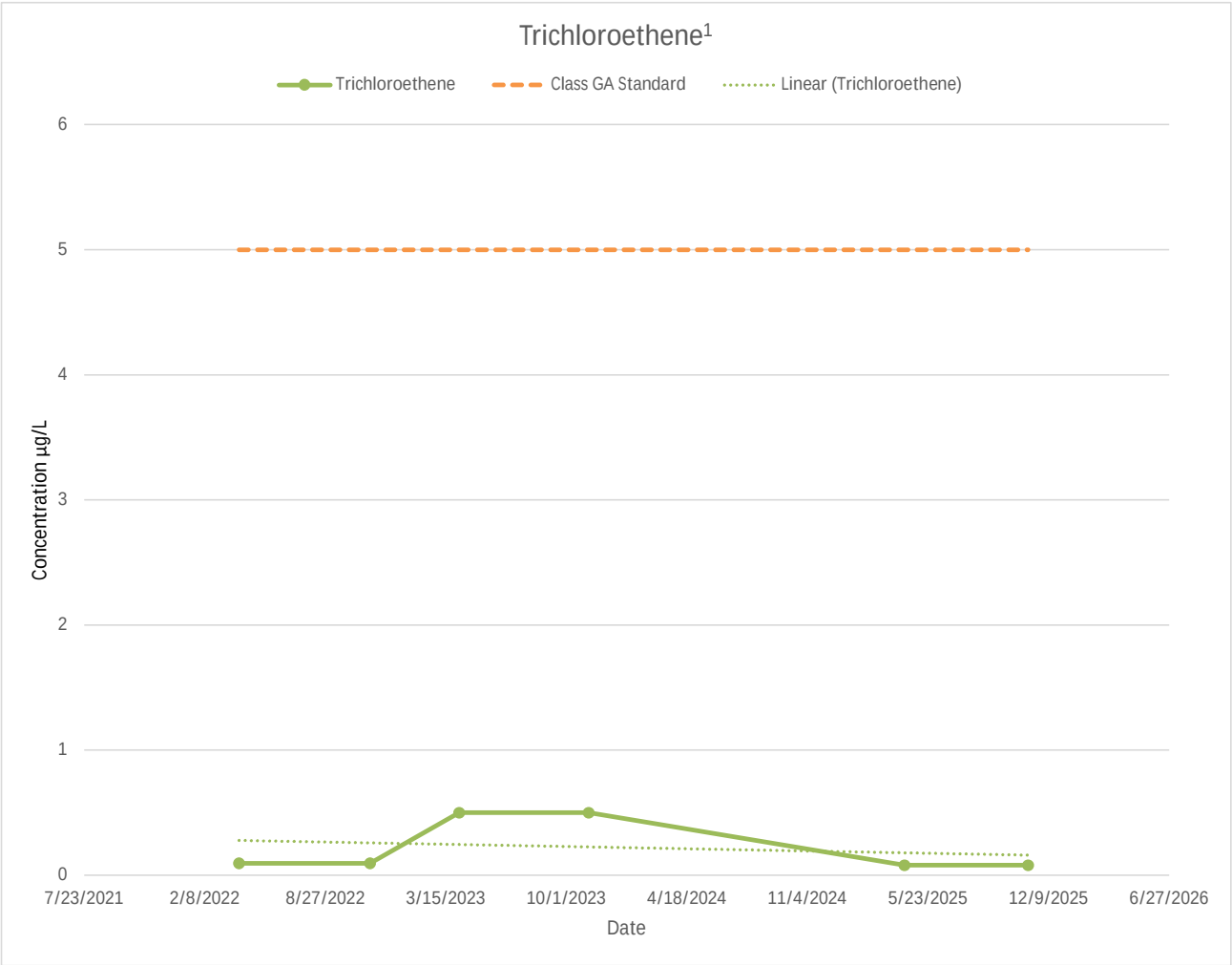
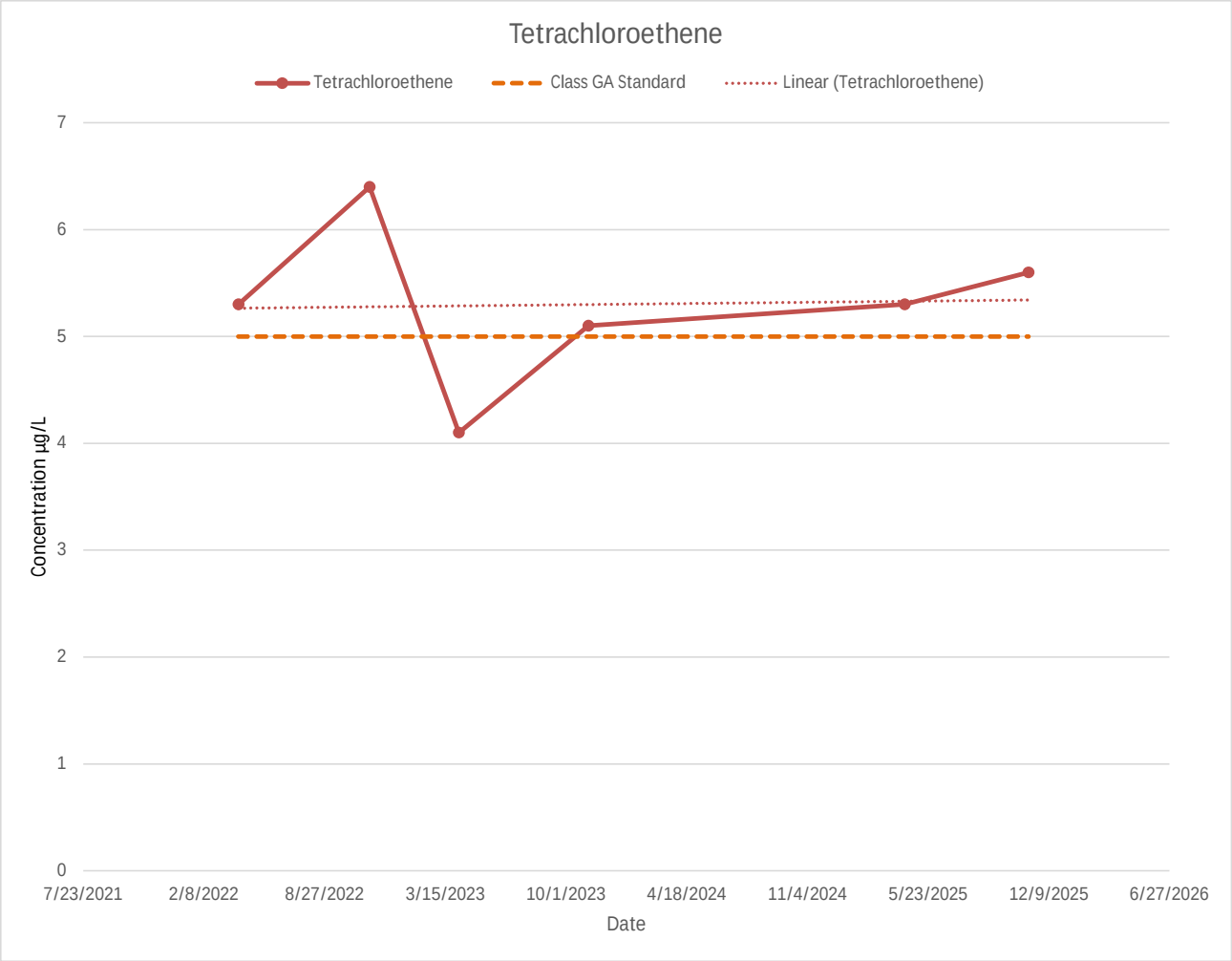
Table 18
MW-26S Recent cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



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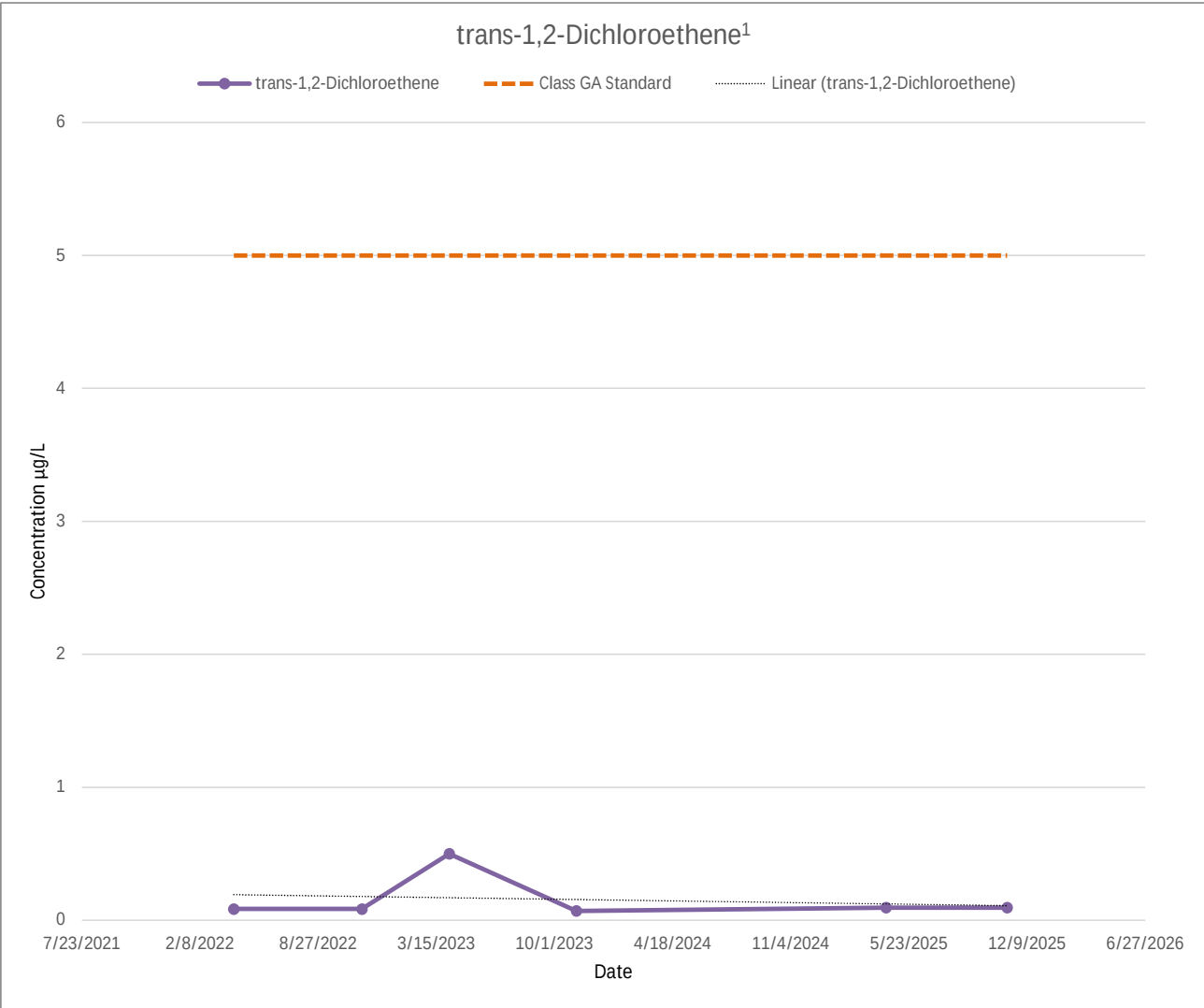
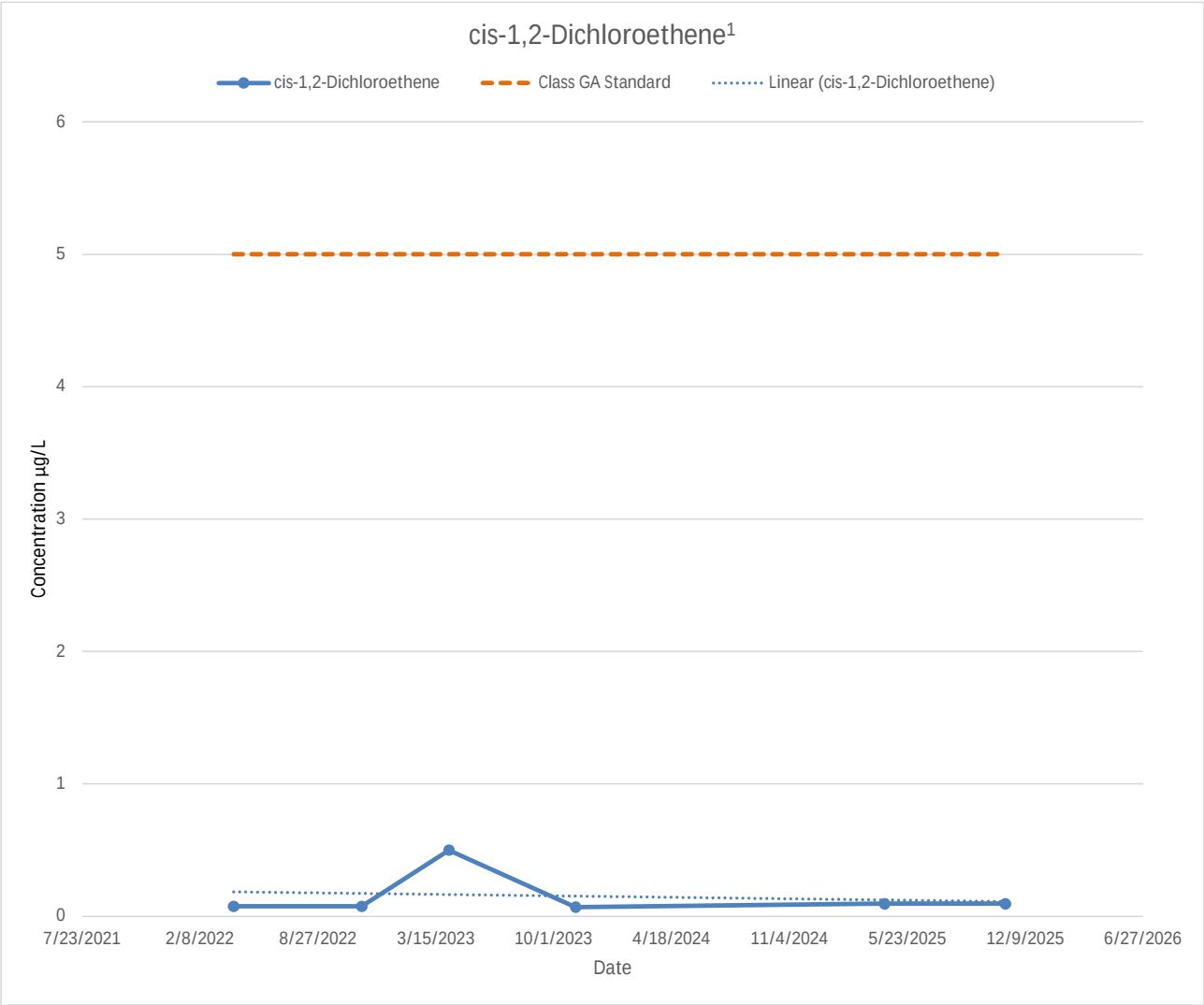
Table 19
MW-27S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



1: Results that were not detected above the laboratory reporting limit were plotted as half of the reporting limit.



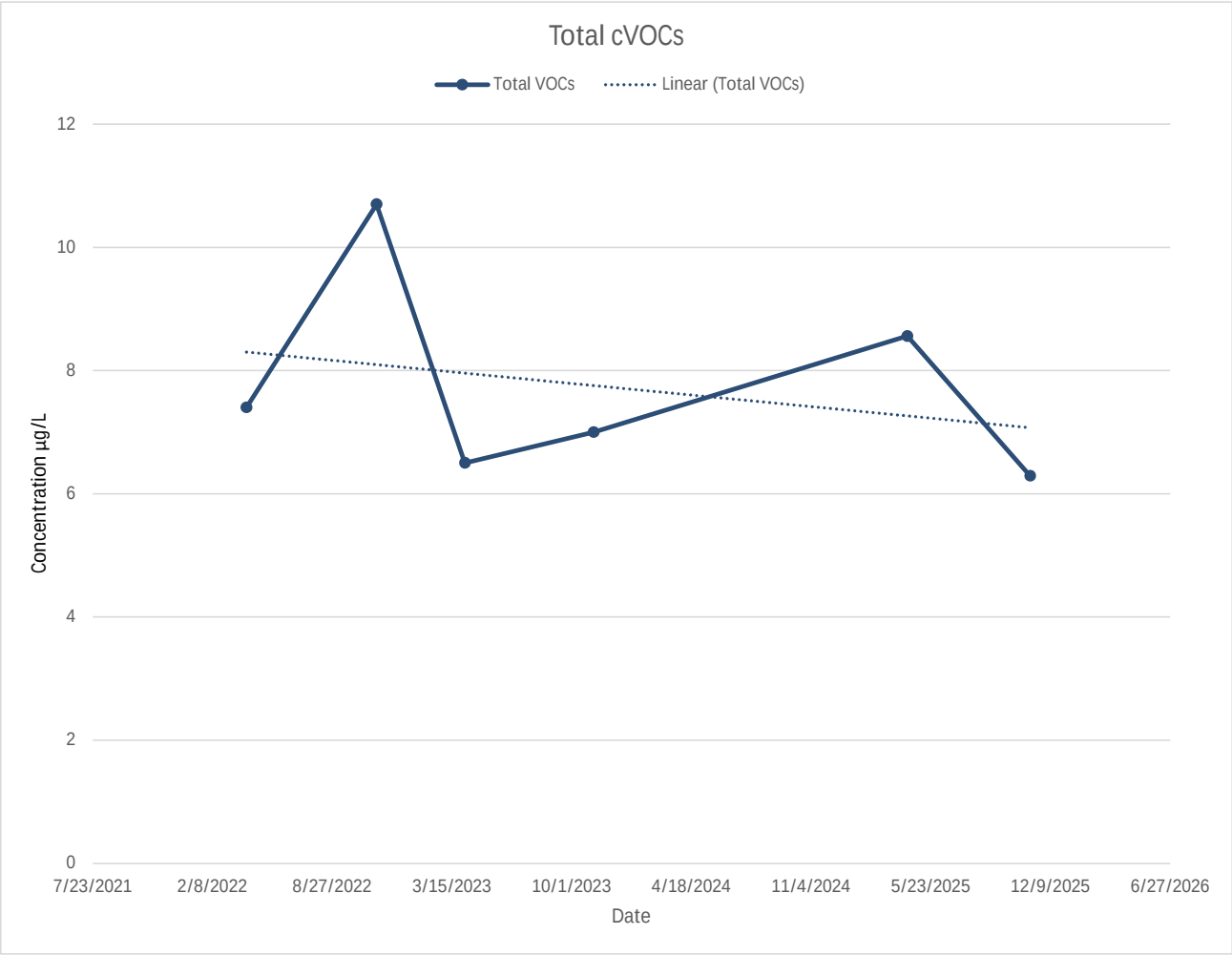
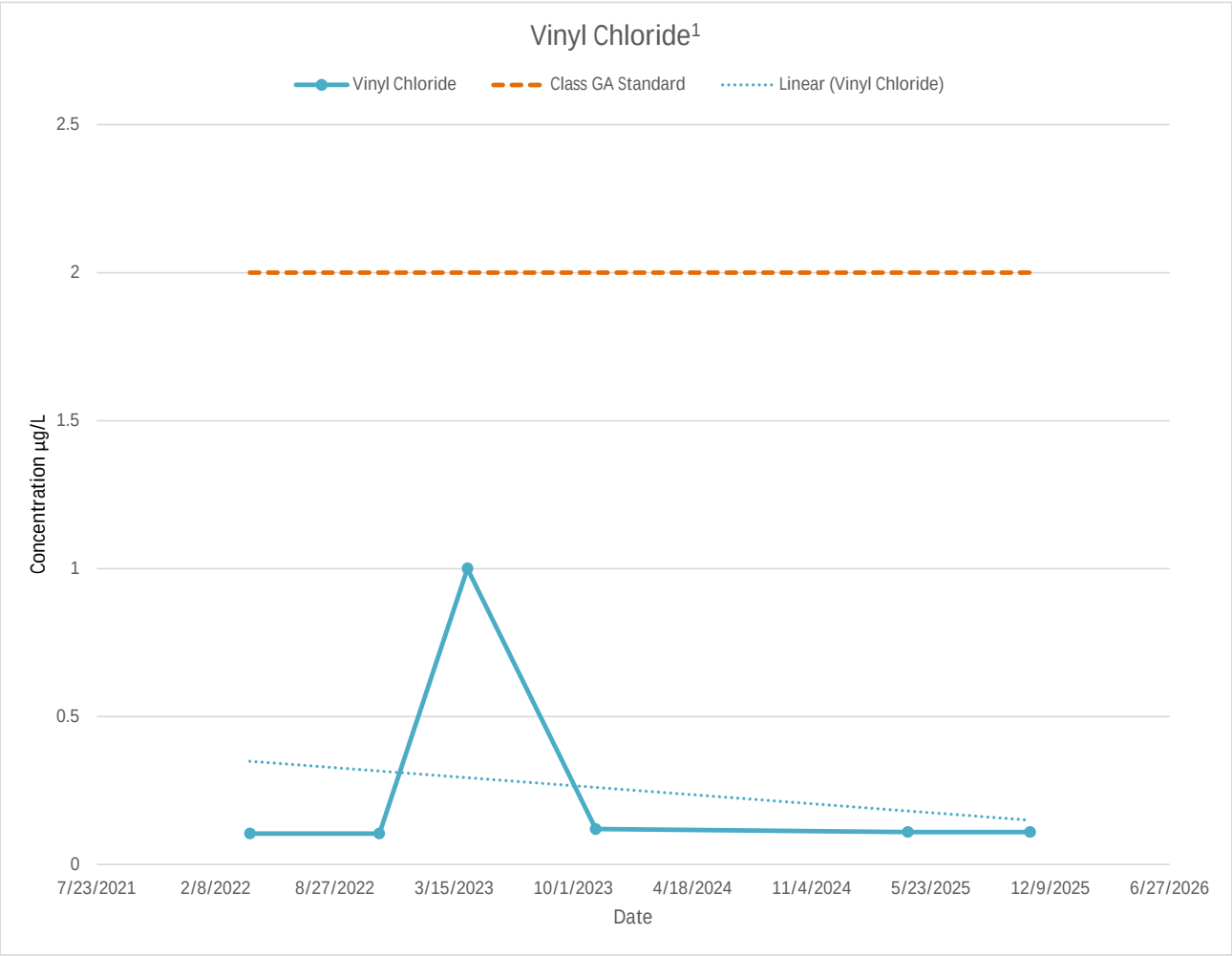
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275 Franklin Street and 432 Pearl Street BCP Site



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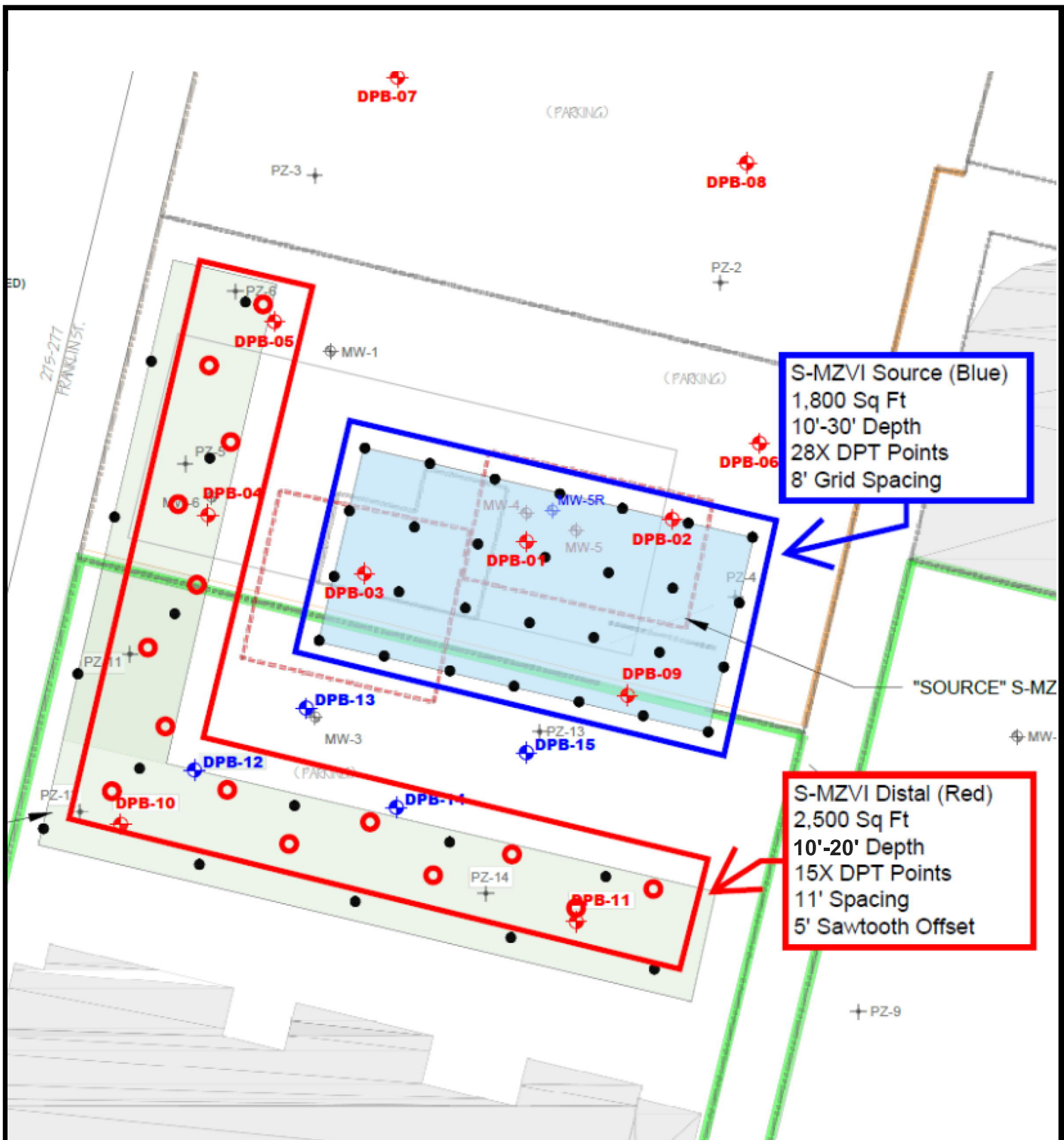
Table 19
MW-27S Post Excavation cVOCs Trends
275 Franklin Street and 432 Pearl Street BCP Site



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Appendix C – Regeneration Remedial Design Summary





275 Franklin St.
 Inventum Engineering LLC
 March 24, 2026

Figure 1-Treatment Area Map



REMEDIAL DESIGN SUMMARIES

Project Information		
275 Franklin Street		
Buffalo, NY		
S-MZVI Source Area		
Prepared For:		
Todd Waldrop, P.E. (Inventum Engineering)		
Target Treatment Zone (TTZ) Info	Unit	Value
Areal Extent	sq ft	1,800
Top Treatment Depth	ft	10.0
Bottom Treatment Depth	ft	30.0
Vertical Treatment Interval	ft	20.0
Treatment Zone Volume	ft ³	36,000
Treatment Zone Volume	cy	1,333
Soil Type	---	sand
Porosity	cm ³ /cm ³	0.33
Effective Porosity	cm ³ /cm ³	0.20
Treatment Zone Pore Volume	gals	88,869
Treatment Zone Effective Pore Volume	gals	53,860
Application Design Summary		
Treatment Area	sq ft	1800
Top Treatment Depth	ft bgs	10.0
Bottom Treatment Depth	ft bgs	30.0
Treatment Type	-	Grid
Spacing Within Rows	ft	8.0
Spacing Between Rows	ft	8.0
DPT Injection Points	-	28
S-MZVI to be Applied	lbs	4000
S-MZVI to be Applied	gals	265
Volume Water	gals	16,535
Total S-MZVI Mix Volume	gals	16,800
Volume per Point	gals	600
Injection Volume per Foot	gals	30
Application Dosing		
S-MZVI to be Applied	lbs	4,000
Prepared By: Brian Henderson, Design Specialist		
Date: 3/23/2026		

Project Information		
275 Franklin Street		
Buffalo, NY		
S-MZVI Distal Area		
Prepared For:		
Todd Waldrop, P.E. (Inventum Engineering)		
Target Treatment Zone (TTZ) Info	Unit	Value
Areal Extent	sq ft	2,500
Top Treatment Depth	ft	10.0
Bottom Treatment Depth	ft	20.0
Vertical Treatment Interval	ft	10.0
Treatment Zone Volume	ft ³	25,000
Treatment Zone Volume	cy	926
Soil Type	---	sand
Porosity	cm ³ /cm ³	0.33
Effective Porosity	cm ³ /cm ³	0.20
Treatment Zone Pore Volume	gals	61,714
Treatment Zone Effective Pore Volume	gals	37,403
Application Design Summary		
Treatment Area	sq ft	2500
Top Treatment Depth	ft bgs	10.0
Bottom Treatment Depth	ft bgs	20.0
Treatment Type	-	Grid
Spacing Within Rows	ft	11.0
Spacing Between Rows	ft	15.0
DPT Injection Points	-	15
S-MZVI to be Applied	lbs	2000
S-MZVI to be Applied	gals	132
Volume Water	gals	6,617
Total S-MZVI Mix Volume	gals	6,750
Volume per Point	gals	450
Injection Volume per Foot	gals	45
Application Dosing		
S-MZVI to be Applied	lbs	2,000
Prepared By: Brian Henderson, Design Specialist		
Date: 3/23/2026		

Appendix D – S-MZVI Safety Data Sheet



SAFETY DATA SHEET

1. Identification

Product identifier S-MicroZVI or S-MZVI

Other means of identification None.

Recommended use Remediation of contaminants in soil and groundwater.

Recommended restrictions None known.

Manufacturer/Importer/Supplier/Distributor information

Company Name REGENESIS

Address 1011 Calle Sombra
San Clemente, CA 92673 USA

General information 949-366-8000

E-mail CustomerService@regenesisis.com

Emergency phone number For Dangerous Goods Incidents ONLY (spill, leak, fire, exposure or accident), call CHEMTREC 24/7 at:

USA, Canada 1-800-424-9300

International +1 703-741-5970

2. Hazard(s) identification

Physical hazards Not classified.

Health hazards Not classified.

OSHA defined hazards Not classified.

Label elements

Hazard symbol None.

Signal word None.

Hazard statement The mixture does not meet the criteria for classification.

Precautionary statement

Prevention Observe good industrial hygiene practices.

Response Wash hands after handling.

Storage Store away from incompatible materials.

Disposal Dispose of waste and residues in accordance with local authority requirements.

Hazard(s) not otherwise classified (HNOC) None known.

Supplemental information Contact with acids liberates very toxic gas.

3. Composition/information on ingredients

Mixtures

Chemical name	CAS number	%
Glycerol	56-81-5	40 - 50
Zero valent iron	7439-89-6	30 - 50
Iron(II) sulfide	1317-37-9	1 - 4

Composition comments All concentrations are in percent by weight unless otherwise indicated. Components not listed are either non-hazardous or are below reportable limits.

4. First-aid measures

Inhalation Move to fresh air. Call a physician if symptoms develop or persist.

Skin contact Wash off with soap and water. Get medical attention if irritation develops and persists.

Eye contact Rinse with water. Get medical attention if irritation develops and persists.

Ingestion	Rinse mouth. Get medical attention if symptoms occur.
Most important symptoms/effects, acute and delayed	Direct contact with eyes may cause temporary irritation.
Indication of immediate medical attention and special treatment needed	Treat symptomatically.
General information	Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. Show this safety data sheet to the doctor in attendance.

5. Fire-fighting measures

Suitable extinguishing media	Use fire-extinguishing media appropriate for surrounding materials.
Unsuitable extinguishing media	None known.
Specific hazards arising from the chemical	During fire, gases hazardous to health may be formed. Combustion products may include: carbon oxides, iron oxides.
Special protective equipment and precautions for firefighters	Self-contained breathing apparatus and full protective clothing must be worn in case of fire.
Fire fighting equipment/instructions	Move containers from fire area if you can do so without risk.
Specific methods	Use standard firefighting procedures and consider the hazards of other involved materials.
General fire hazards	This material will not burn until the water has evaporated. Residue can burn.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures	Keep unnecessary personnel away. For personal protection, see section 8 of the SDS.
Methods and materials for containment and cleaning up	Large Spills: Stop the flow of material, if this is without risk. Dike the spilled material, where this is possible. Absorb in vermiculite, dry sand or earth and place into containers. Following product recovery, flush area with water. Small Spills: Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination. Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS.
Environmental precautions	Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling	Avoid prolonged exposure. Observe good industrial hygiene practices.
Conditions for safe storage, including any incompatibilities	Store in original tightly closed container. Store away from incompatible materials (see Section 10 of the SDS).

8. Exposure controls/personal protection

Occupational exposure limits

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Components	Type	Value	Form
Glycerol (CAS 56-81-5)	PEL	5 mg/m ³	Respirable fraction.
		15 mg/m ³	Total dust.

US. OSHA Table Z-3 (29 CFR 1910.1000)

Components	Type	Value	Form
Glycerol (CAS 56-81-5)	TWA	5 mg/m ³	Respirable fraction.
		15 mg/m ³	Total dust.
		50 mppcf	Total dust.
		15 mppcf	Respirable fraction.

Biological limit values	No biological exposure limits noted for the ingredient(s).
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Appropriate engineering controls	Good general ventilation should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level.
Individual protection measures, such as personal protective equipment	
Eye/face protection	Wear safety glasses with side shields (or goggles).
Skin protection	
Hand protection	Wear appropriate chemical resistant gloves. Suitable gloves can be recommended by the glove supplier.
Skin protection	
Other	Wear suitable protective clothing.
Respiratory protection	In case of insufficient ventilation, wear suitable respiratory equipment.
Thermal hazards	Wear appropriate thermal protective clothing, when necessary.
General hygiene considerations	Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance

Physical state	Liquid.
Form	Viscous metallic suspension.
Color	Dark gray
Odor	Slight.
Odor threshold	Property has not been measured.
pH	10 (As shipped) 7 - 8 (When mixed with water)
Melting point/freezing point	Property has not been measured.
Initial boiling point and boiling range	Property has not been measured.
Flash point	Property has not been measured.
Evaporation rate	Property has not been measured.
Flammability (solid, gas)	Not applicable.
Upper/lower flammability or explosive limits	
Explosive limit - lower (%)	Property has not been measured.
Explosive limit - upper (%)	Property has not been measured.
Vapor pressure	Property has not been measured.
Vapor density	Property has not been measured.
Relative density	Property has not been measured.
Solubility(ies)	
Solubility (water)	Property has not been measured.
Partition coefficient (n-octanol/water)	Property has not been measured.
Auto-ignition temperature	Property has not been measured.
Decomposition temperature	Property has not been measured.
Viscosity	3000 cP (77 °F (25 °C))
Other information	
Density	Property has not been measured.
Explosive properties	Not explosive.
Kinematic viscosity	Property has not been measured.
Oxidizing properties	Not oxidizing.

10. Stability and reactivity

Reactivity	The product is stable and non-reactive under normal conditions of use, storage and transport.
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Chemical stability	Material is stable under normal conditions.
Possibility of hazardous reactions	Contact with acids will release highly flammable and highly toxic hydrogen sulfide gas. Can react with some acids with the evolution of hydrogen.
Conditions to avoid	Contact with incompatible materials. Avoid drying out product.
Incompatible materials	Strong oxidizing agents. Acids.
Hazardous decomposition products	No hazardous decomposition products are known.

11. Toxicological information

Information on likely routes of exposure

Inhalation	Spray mist may irritate the respiratory system. For dry material: Dust may irritate respiratory system.
Skin contact	Prolonged or repeated exposure may cause minor irritation.
Eye contact	Direct contact with eyes may cause temporary irritation.
Ingestion	May cause discomfort if swallowed.

Symptoms related to the physical, chemical and toxicological characteristics Direct contact with eyes may cause temporary irritation.

Information on toxicological effects

Acute toxicity Not expected to be acutely toxic.

Components	Species	Test Results
Glycerol (CAS 56-81-5)		
<u>Acute</u>		
Dermal		
LD50	Rabbit	> 18700 mg/kg
Oral		
LD50	Rat	27200 mg/kg

Skin corrosion/irritation Prolonged skin contact may cause temporary irritation.

Serious eye damage/eye irritation Direct contact with eyes may cause temporary irritation.

Respiratory or skin sensitization

Respiratory sensitization	Not a respiratory sensitizer.
Skin sensitization	This product is not expected to cause skin sensitization.

Germ cell mutagenicity No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.

Carcinogenicity Not classifiable as to carcinogenicity to humans.

IARC Monographs. Overall Evaluation of Carcinogenicity

Not listed.

NTP Report on Carcinogens

Not listed.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1053)

Not listed.

Reproductive toxicity This product is not expected to cause reproductive or developmental effects.

Specific target organ toxicity - single exposure Not classified.

Specific target organ toxicity - repeated exposure Not classified.

Aspiration hazard Not an aspiration hazard.

Further information Contains an ingredient known to produce adverse effects in a small percentage of hypersensitive individuals exhibited as respiratory distress and allergic skin reactions.

12. Ecological information

Ecotoxicity The product is not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.

Components	Species	Test Results
Glycerol (CAS 56-81-5)		
Aquatic		
<i>Acute</i>		
Crustacea	EC50	Daphnia magna
		> 10000 mg/l, 24 Hours
Persistence and degradability	No data is available on the degradability of this product.	
Bioaccumulative potential	No data available.	
Partition coefficient n-octanol / water (log Kow)		
Glycerol (CAS 56-81-5)		-1.76
Mobility in soil	No data available.	
Other adverse effects	None known.	

13. Disposal considerations

Disposal instructions	Collect and reclaim or dispose in sealed containers at licensed waste disposal site.
Local disposal regulations	Dispose in accordance with all applicable regulations.
Hazardous waste code	The waste code should be assigned in discussion between the user, the producer and the waste disposal company.
Waste from residues / unused products	Dispose in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).
Contaminated packaging	Since emptied containers may retain product residue, follow label warnings even after container is emptied. Empty containers should be taken to an approved waste handling site for recycling or disposal.

14. Transport information

DOT	Not regulated as dangerous goods.
IATA	Not regulated as dangerous goods.
IMDG	Not regulated as dangerous goods.
Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code	Not established.

15. Regulatory information

US federal regulations	This product is not known to be a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.	
TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)	Not regulated.	
CERCLA Hazardous Substance List (40 CFR 302.4)	Not listed.	
SARA 304 Emergency release notification	Not regulated.	
OSHA Specifically Regulated Substances (29 CFR 1910.1001-1053)	Not listed.	
Toxic Substances Control Act (TSCA)	All components of the mixture on the TSCA 8(b) inventory are designated "active".	
Superfund Amendments and Reauthorization Act of 1986 (SARA)		
SARA 302 Extremely hazardous substance	Not listed.	
SARA 311/312 Hazardous chemical	No	
SARA 313 (TRI reporting)	Not regulated.	

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA)

Not regulated.

FEMA Priority Substances Respiratory Health and Safety in the Flavor Manufacturing Workplace

Glycerol (CAS 56-81-5)

Other Flavoring Substances with OSHA PEL's

US state regulations

US. Massachusetts RTK - Substance List

Glycerol (CAS 56-81-5)

US. New Jersey Worker and Community Right-to-Know Act

Glycerol (CAS 56-81-5)

US. Pennsylvania Worker and Community Right-to-Know Law

Glycerol (CAS 56-81-5)

US. Rhode Island RTK

Glycerol (CAS 56-81-5)

California Proposition 65

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): This material is not known to contain any chemicals currently listed as carcinogens or reproductive toxins. For more information go to www.P65Warnings.ca.gov.

US. California. Candidate Chemicals List. Safer Consumer Products Regulations (Cal. Code Regs, tit. 22, 69502.3, subd. (a))

Zero valent iron (CAS 7439-89-6)

International Inventories

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Industrial Chemicals (AICIS)	Yes
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	Yes
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Existing Chemicals List (ECL)	Yes
New Zealand	New Zealand Inventory	Yes
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	Yes
Taiwan	Taiwan Chemical Substance Inventory (TCSI)	Yes
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

*A "Yes" indicates that all components of this product comply with the inventory requirements administered by the governing country(s)

A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date	27-December-2018
Revision date	25-May-2022
Version #	02
HMIS® ratings	Health: 1 Flammability: 1 Physical hazard: 0 Personal protection: B

NFPA ratings



Disclaimer

Regenesis cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

Appendix E – Injection Setup Detail (Example)



Injection Application Equipment

The remediation technologies will be prepared and applied via an RRS custom injection trailer(s) (see image below). Each injection trailer is fully enclosed and contains mixing tanks, pumps, and a delivery system equipped for direct connection to downhole injection tooling or injection wells. In short, each trailer has the following components:

- Flow and pressure transducers to ensure accuracy and safety
- Complete drain conical mixing tanks
- Vortex/Cyclone mixer
- Application pump
- Multiple fluid delivery lines
- Self-sufficient, dedicated power
- Slip-resistant and chemical-resistant flooring
- Backflow prevention
- Pressure bypass controls
- Emergency eyewash and First-Aid station



Overhead view of injection trailer dimensions

