DECISION DOCUMENT

Former American Linen Supply Company Facility
Brownfield Cleanup Program
Buffalo, Erie County
Site No. C915241
August 2014

Prepared by
Division of Environmental Remediation
New York State Department of Environmental Conservation

DECLARATION STATEMENT - DECISION DOCUMENT

Former American Linen Supply Company Facility
Brownfield Cleanup Program
Buffalo, Erie County
Site No. C915241
August 2014

Statement of Purpose and Basis

This document presents the remedy for the Former American Linen Supply Company Facility site, a brownfield cleanup site. The remedial program was chosen in accordance with the New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 375.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the Former American Linen Supply Company Facility site and the public's input to the proposed remedy presented by the Department.

Description of Selected Remedy

The elements of the selected remedy are as follows:

1. Remedial Design:
A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows:

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse gases and other emissions;
- Increasing energy efficiency and minimizing use of non-renewable energy;
- Conserving and efficiently managing resources and materials;
- Reducing waste, increasing recycling and increasing reuse of materials which would otherwise be considered a waste;
- Maximizing habitat value and creating habitat when possible;
- Fostering green and healthy communities and working landscapes which balance ecological, economic and social goals; and
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.

2. Excavation:

- Approximately 1000 cubic yards of soil contaminated with chlorinated volatile organic

compounds (VOCs) above the protection of groundwater soil cleanup objectives (SCOs) will be removed from the site.

- On-site soil which does not exceed commercial SCOs for the use of the site and/or the protection of groundwater may be used to backfill the excavation below the cover system.
- Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to replace the excavated soil or complete the backfilling of the excavation and establish the designed grades at the site.

3. Cover System:

- A site cover will be required to allow for a commercial use of the site. The cover will consist either of the structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper one foot of exposed surface soil due to historic fill materials and other impacted soils will exceed the applicable soil cleanup objectives (SCOs). Where the soil cover is required it will be a minimum of one foot of soil, meeting the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d) for commercial use. The soil cover will be placed over a demarcation layer, with the upper six inches of the soil of sufficient quality to maintain a vegetation layer. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6 NYCRR Part 375-6.7(d).
- The area surrounding the underground storage tanks excavation will be paved. The current pavement cover in areas outside the former building footprint will be maintained.

4. Monitored Natural Attenuation:

- Groundwater contamination will be addressed with monitored natural attenuation (MNA). Groundwater will be monitored for site related contamination (PCE, TCE, cis-DCE, and VC) which will provide an understanding of the (biological activity) breaking down the contamination. It is anticipated that contamination will decrease over a period of 5 years. Reports of the attenuation will be provided at 5 years and active remediation will be proposed if it appears that natural processes alone will not address the contamination. The contingency remedial action will depend on the information collected, but it is currently anticipated that an in-situ technology such as accelerated bioremediation by using slow release compounds would be the expected contingency remedial action.

5. Institutional Control:

- Imposition of an institutional control in the form of an environmental easement for the controlled property that: requires the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- allows the use and development of the controlled property for commercial and industrial uses as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- restricts the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH;
- requires compliance with the Department approved Site Management Plan.

6. Site Management Plan:

A Site Management Plan is required, which includes the following:

a. an Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective.

Institutional Controls: The Environmental Easement discussed in Paragraph 5 above.

Engineering Controls: The soil cover discussed in Paragraph 3 above.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- descriptions of the provisions of the environmental easement including any land use and groundwater use restrictions;
- a provision for evaluation of the potential for soil vapor intrusion for any buildings developed on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
- provisions for the management and inspection of the identified engineering controls;
- maintaining site access controls and Department notification; and
- the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

b. A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:

- monitoring of groundwater to assess the performance and effectiveness of the remedy;
- a schedule of monitoring and frequency of submittals to the Department; and
- monitoring for vapor intrusion for any buildings developed on the site, as may be required by the Institutional and Engineering Control Plan discussed above.

Declaration

The remedy conforms with promulgated standards and criteria that are directly applicable, or that are relevant and appropriate and takes into consideration Department guidance, as appropriate. The remedy is protective of public health and the environment.

Susan L. Edwards

08/14/2014

_____ _____for MJC

Date Michael Cruden, Director
Remedial Bureau E

DECISION DOCUMENT

Former American Linen Supply Company Facility
Buffalo, Erie County
Site No. C915241
August 2014

SECTION 1: SUMMARY AND PURPOSE

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), has selected a remedy for the above referenced site. The disposal of contaminants at the site has resulted in threats to public health and the environment that would be addressed by the remedy. The disposal or release of contaminants at this site, as more fully described in this document, has contaminated various environmental media. Contaminants include hazardous waste and/or petroleum.

The New York State Brownfield Cleanup Program (BCP) is a voluntary program. The goal of the BCP is to enhance private-sector cleanups of brownfields and to reduce development pressure on "greenfields." A brownfield site is real property, the redevelopment or reuse of which may be complicated by the presence or potential presence of a contaminant.

The Department has issued this document in accordance with the requirements of New York State Environmental Conservation Law and 6 NYCRR Part 375. This document is a summary of the information that can be found in the site-related reports and documents.

SECTION 2: CITIZEN PARTICIPATION

The Department seeks input from the community on all remedies. A public comment period was held during which the public was encouraged to submit comment on the proposed remedy. All comments on the remedy received during the comment period were considered by the Department in selecting a remedy for the site. Site-related reports and documents were made available for review by the public at the following document repository:

Buffalo & Erie County Public Library
Attn: Mary Jean Jakubowski
1 Lafayette Square
Buffalo, NY 14203-1887
Phone: 716-858-9000

Receive Site Citizen Participation Information By Email

Please note that the Department's Division of Environmental Remediation (DER) is "going paperless" relative to citizen participation information. The ultimate goal is to distribute citizen

participation information about contaminated sites electronically by way of county email listservs. Information will be distributed for all sites that are being investigated and cleaned up in a particular county under the State Superfund Program, Environmental Restoration Program, Brownfield Cleanup Program, Voluntary Cleanup Program, and Resource Conservation and Recovery Act Program. We encourage the public to sign up for one or more county listservs at http://www.dec.ny.gov/chemical/61092.html

SECTION 3: SITE DESCRIPTION AND HISTORY

Location: The Former American Linen Supply Company Facility property is approximately 2.9 acres in size and is located at 822 Seneca Street in the City of Buffalo. The site is bounded to the north by Seymour Street, to the east by Lord Street, to the west by a vacant lot and commercial properties, and to the south by Seneca Street. The Site property line represents the Site boundary.

Site Features: The site is located in an urban area of mixed residential (along Seymour and Lord Streets), commercial and industrial land use. The on-site building has been demolished. The site is completely fenced. A single family home located at 798 Seneca Street is surrounded by the site on three sides.

Current Zoning and Land Use: The site is currently zoned for light industrial use.

Past Use of the Site: The site was used as a book binding and printing facility from 1910 to 1978. Coverall Service and Supply Company, a uniform dry cleaning facility, operated from 1978 to 1985. Coverall changed their name to AmeriPride Services, Inc. in 1997. Records indicate that tetrachloroethylene (PCE) was used for drycleaning operations. A portion of the facility was used by Thorner Sydney Press until 1997. All laundry operations ceased in April 2004. In 2005, the site was used as a vehicle maintenance shop. The site has been unoccupied since 2005. The vacant industrial building was demolished in 2011 and 2012. In January 2014, the site was sold to Mill Race Commons, LLC.

Site Geology and Hydrogeology:
The site is generally flat. The unconsolidated geologic materials (soil) encountered at the site range in thickness from approximately 15 to greater than 20 feet thick. Soils at the site consist of historic fill materials (0.5 to 12 ft) overlying native soil. The fill materials include gravel, sand, silt, clay, ash, slag, and bricks, etc. A discrete layer of historic fill containing high ash content was found between 3 and 6.5 feet bgs and reworked clay between 6.5 and 8 feet bgs in the dry cleaning area. The native soils below fill layer consist of lacustrine silt, clay, and till. Bedrock is approximately 20 ft below ground surface and consists of Devonian Onondaga Limestone. The depth of groundwater at the site varies from 2.75 ft. bgs to 10.5 ft. bgs and it flows south toward the Buffalo River, which is located less than one mile from the site.

A site location map is attached as Figure 1.

SECTION 4: LAND USE AND PHYSICAL SETTING

The Department may consider the current, intended, and reasonably anticipated future land use

of the site and its surroundings when evaluating a remedy for soil remediation. For this site, alternatives (or an alternative) that restrict(s) the use of the site to commercial use (which allows for industrial use) as described in Part 375-1.8(g) were/was evaluated in addition to an alternative which would allow for unrestricted use of the site.

A comparison of the results of the Remedial Investigation (RI) to the appropriate standards, criteria and guidance values (SCGs) for the identified land use and the unrestricted use SCGs for the site contaminants is available in the RI Report.

SECTION 5: ENFORCEMENT STATUS

The Applicant under the Brownfield Cleanup Agreement is a Participant. The Applicant has an obligation to address on-site and off-site contamination. In addition, the Department has determined that this site does not pose a significant threat to public health or environment. Accordingly, no enforcement actions are necessary.

SECTION 6: SITE CONTAMINATION

6.1: Summary of the Remedial Investigation

A remedial investigation (RI) serves as the mechanism for collecting data to:

- characterize site conditions;
- determine the nature of the contamination; and
- assess risk to human health and the environment.

The RI is intended to identify the nature (or type) of contamination which may be present at a site and the extent of that contamination in the environment on the site, or leaving the site. The RI reports on data gathered to determine if the soil, groundwater, soil vapor, indoor air, surface water or sediments may have been contaminated. Monitoring wells are installed to assess groundwater and soil borings or test pits are installed to sample soil and/or waste(s) identified. If other natural resources are present, such as surface water bodies or wetlands, the water and sediment may be sampled as well. Based on the presence of contaminants in soil and groundwater, soil vapor also may be sampled for the presence of contamination. Data collected in the RI influence the development of remedial alternatives. The RI report is available for review in the site document repository and the results are summarized in section 6.3.

The analytical data collected on this site includes data for:

- groundwater
- soil
- soil vapor

6.1.1: Standards, Criteria, and Guidance (SCGs)

The remedy must conform to promulgated standards and criteria that are directly applicable or

that are relevant and appropriate. The selection of a remedy must also take into consideration guidance, as appropriate. Standards, Criteria and Guidance are hereafter called SCGs.

To determine whether the contaminants identified in various media are present at levels of concern, the data from the RI were compared to media-specific SCGs. The Department has developed SCGs for groundwater, surface water, sediments, and soil. The NYSDOH has developed SCGs for drinking water and soil vapor intrusion. For a full listing of all SCGs see: http://www.dec.ny.gov/regulations/61794.html

6.1.2: RI Results

The data have identified contaminants of concern. A "contaminant of concern" is a contaminant that is sufficiently present in frequency and concentration in the environment to require evaluation for remedial action. Not all contaminants identified on the property are contaminants of concern. The nature and extent of contamination and environmental media requiring action are summarized below. Additionally, the RI Report contains a full discussion of the data. The contaminant(s) of concern identified at this site is/are:

Vinyl Chloride
Trichloroethene (TCE)
Tetrachloroethene (PCE)
Polycyclic Aromatic Hydrocarbons (PAHs)
Arsenic
Copper
Mercury
Dichloroethene (cis-1,2-)

The contaminant(s) of concern exceed the applicable SCGs for:

- groundwater
- soil

6.2: Interim Remedial Measures

An interim remedial measure (IRM) is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before issuance of the Decision Document.

The following IRM(s) has/have been completed at this site based on conditions observed during the RI.

Building Demolition (2011-2012)

1. Asbestos abatement and hazardous building material removal
2. Removal of the above-grade building structure
3. Removal of the building slab
4. Basement dewatering and clean out
5. Removal of the basement walls, floor slab, and associated drainage structures
6. Removal of the aboveground storage tanks and building equipment
7. Removal of transformer pads and bollards

8. Backfilling of the former basement first with unstained crushed building concrete followed by covering the concrete with verified clean clay.

Removal of impacted soils and other materials (2013 - 2014)

1. Approximately 12,000 tons of contaminated soil and fill above the protection of groundwater SCOs were removed.
2. Water generated from dewatering basement and during excavations conducted during the soil removal IRM was collected in tank, passed through liquid-phase carbon treatment (if needed) and was discharged to Buffalo Sewer Authority (BSA) under a permit.
3. Removal of cisterns and oily sludge containing VOCs, PAHs, and PCBs from the basement.
4. Cleaned up spill (No.1203103). The spill was due to equipment-leaked oil.
5. Removal of historic fill, concrete, and debris impacted by ash material 979 cubic yards).
6. Removal of soil impacted by pipe sludge (30 cubic yards of impacted soil).
7. Removal of two closed in-place aboveground storage tanks (5,000 gallon heating oil and 5,000 gallon lime slurry), contaminated soil (10 cubic yards) and building equipment.
8. Removal of storm water vault and 1,500 gallon closed in place waste oil under ground storage tank.
9. Removal of shallow fill from test pit areas (TP-16 and TP-18) showing elevated levels of CVOCs.
10. Removal of fill from dry cleaning area.

6.3: Summary of Environmental Assessment

This section summarizes the assessment of existing and potential future environmental impacts presented by the site. Environmental impacts may include existing and potential future exposure pathways to fish and wildlife receptors, wetlands, groundwater resources, and surface water. The RI report presents a detailed discussion of any existing and potential impacts from the site to fish and wildlife receptors.

Prior to the Interim Remedial Measure:
The soil and groundwater conditions at the site were investigated during a Phase II investigation by ENSR in 2005 and a Remedial Investigation by Haley & Aldrich in 2013. Based upon investigations conducted to date, the primary contaminants of concern are chlorinated volatile organic compounds [tetrachloroethene (PCE), trichloroethene (TCE), cis-dichloroethene (cis-DCE), and vinyl chloride] related to the dry cleaning solvents, and metals and polycyclic aromatic hydrocarbons (PAHs) related to fill containing ash materials.

Soil: PCE and its related chlorinated volatile organic compounds (VOCs) were found in several soil samples with the highest concentration of PCE at 43.5 ppm, significantly exceeding the soil cleanup objective (SCO) for protection of groundwater (1.3 ppm). The historic fill containing ash exceeded commercial SCOs for several metals and PAHs. The metals exceeding commercial SCOs were: arsenic at 34 ppm (SCO - 16 ppm), barium at 593 ppm (SCO - 400 ppm), copper at 301 ppm (SCO - 270 ppm) and mercury at 3.91 ppm (SCO - 2.8 ppm). The PAHs exceeding commercial SCOs were: benzo(a)anthracene at 7.18 ppm (SCO - 5.6 ppm), benzo(a)pyrene at

6.74 ppm (SCO - 1.0 ppm), benzo(b)fluoranthene at 8.16 ppm (SCO - 5.6 ppm) and dibenz(a,h)anthracene at 0.86 ppm (SCO - 0.56 ppm).

On-site Sewer: Samples collected from the sewer vault showed VOCs (trimethylbenzenes, isopropylbenzene, naphthalene) and PAHs. The sewer vault and its connecting pipe to the sewer at Seneca Street were removed during the IRM. The vault's sewer connection was also decommissioned by the installation of a brick and mortar plug.

Soil Vapor: Soil vapor sampling outside the 798 Seneca Street property showed petroleum hydrocarbons and chlorinated VOCs. Soil vapor intrusion samples were collected from the off-site residential structure. The sample results were reviewed and compared to NYSDOH guidance values and no additional sampling was determined warranted.

Groundwater: Groundwater standards were exceeded for chlorinated VOCs [PCE, TCE, cis-DCE, and vinyl chloride], metals [iron, magnesium, and sodium], and PAHs [benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, and indeno(1,2,3-cd)pyrene] in overburden and bedrock wells. The highest concentrations of contaminants which exceeded groundwater standards were: PCE - 58 ppb (std. - 5 ppb), TCE – 47 ppb (std. – 5 ppb), cis-DCE - 175 ppb (std. - 5 ppb), vinyl chloride - 103 ppb (std. - 2 ppb), iron – 10,500 ppb (std. - 300 ppb), magnesium – 244,000 ppb (std. - 35,000 ppb), sodium - 527,000 ppb (std. – 20,000 ppb), benzo(b)fluoranthene – 0.2 ppb (std. - 0.002 ppb), benzo(k)fluoranthene – 0.07 ppb (std. - 0.002 ppb), chrysene – 0.07 ppb (std. – 0.002 ppb), and indeno(1,2,3-cd)pyrene – 0.19 ppb (std. – 0.002 ppb). Methyl tertiary butyl ether was found in one upgradient well near an old on-site gasoline storage tank area at 99 ppb.

Post IRM Contamination:
Soil: The levels of chlorinated VOCs in the dry cleaning area were found up to 280 ppm for PCE and 19 ppm for TCE. These concentrations are above the SCOs for the protection of groundwater. Concentrations of the chlorinated VOCs in the basement soil samples collected after removal of the basement floor slab were below the protection of groundwater SCOs. Site-related contaminants do not appear to be contributing to off-site environmental impacts that require additional investigation or remedial action.

On-site Groundwater: Highest levels of chlorinated VOCs were: 120 ppb for cis-DCE and 60 ppb for vinyl chloride. No PCE and TCE were found in any of the on-site monitoring wells.

Off-site Groundwater: Traces of TCE (1.8 ppb) and vinyl chloride (4.3 ppb) were found in off-site wells. Only vinyl chloride exceeded the groundwater standard.

6.4: Summary of Human Exposure Pathways

This human exposure assessment identifies ways in which people may be exposed to site-related contaminants. Chemicals can enter the body through three major pathways (breathing, touching or swallowing). This is referred to as *exposure.*

The site is completely fenced, which restricts public access. However, persons who enter the site could contact contaminants in the soil by walking, digging or otherwise disturbing the soil in some areas of the site. People are not drinking the contaminated groundwater because the area is served by a public water supply that is not affected by this contamination. Volatile organic compounds in the groundwater may move into the soil vapor (air spaces within the soil), which in turn may move into overlying buildings and affect the indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. Because the site is vacant, the inhalation of site related contaminants due to soil vapor intrusion does not represent a current concern. The potential exists for the inhalation of site contaminants due to soil vapor intrusion for any future on-site development and occupancy. Furthermore, environmental sampling indicates soil vapor intrusion is not a concern for off-site buildings.

6.5: Summary of the Remediation Objectives

The objectives for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375. The goal for the remedial program is to restore the site to pre-disposal conditions to the extent feasible. At a minimum, the remedy shall eliminate or mitigate all significant threats to public health and the environment presented by the contamination identified at the site through the proper application of scientific and engineering principles.

The remedial action objectives for this site are:

Groundwater

RAOs for Public Health Protection

- Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.
- Prevent contact with, or inhalation of volatiles, from contaminated groundwater.

RAOs for Environmental Protection

- Restore ground water aquifer to pre-disposal/pre-release conditions, to the extent practicable.
- Prevent the discharge of contaminants to surface water.

Soil

RAOs for Public Health Protection

- Prevent ingestion/direct contact with contaminated soil.
- Prevent inhalation of or exposure from contaminants volatilizing from contaminants in soil.

RAOs for Environmental Protection

- Prevent migration of contaminants that would result in groundwater or surface water contamination.

Soil Vapor

RAOs for Public Health Protection

- Mitigate impacts to public health resulting from existing, or the potential for,

soil vapor intrusion into buildings at a site.

SECTION 7: ELEMENTS OF THE SELECTED REMEDY

The alternatives developed for the site and the evaluation of the remedial criteria are presented in the Alternative Analysis. The remedy is selected pursuant to the remedy selection criteria set forth in DER-10, Technical Guidance for Site Investigation and Remediation and 6 NYCRR Part 375.

The selected remedy is a Track 4: Restricted use with site-specific soil cleanup objectives remedy.

The selected remedy is referred to as the Removal of impacted soils and Installation of a Cover System remedy.

The elements of the selected remedy, as shown in Figure 2, are as follows:

1. Remedial Design:
A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows:

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse gases and other emissions;
- Increasing energy efficiency and minimizing use of non-renewable energy;
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- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development.

2. Excavation:

- Approximately 1000 cubic yards of soil contaminated with chlorinated volatile organic compounds (VOCs) above the protection of groundwater soil cleanup objectives (SCOs) will be removed from the site.
- On-site soil which does not exceed commercial SCOs for the use of the site and/or the protection of groundwater may be used to backfill the excavation below the cover system.
- Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to replace the excavated soil or complete the backfilling of the excavation and establish the designed grades at the site.

3. Cover System:

- A site cover will be required to allow for a commercial use of the site. The cover will consist either of the structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper one foot of exposed surface soil due to historic fill materials and other impacted soils will exceed the applicable soil cleanup objectives (SCOs). Where the soil cover is required it will be a minimum of one foot of soil, meeting the SCOs for cover material as set forth in 6 NYCRR Part 375-6.7(d) for commercial use. The soil cover will be placed over a demarcation layer, with the upper six inches of the soil of sufficient quality to maintain a vegetation layer. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6 NYCRR Part 375-6.7(d).
- The area surrounding the underground storage tanks excavation will be paved. The current pavement cover in areas outside the former building footprint will be maintained.

4. Monitored Natural Attenuation:

- Groundwater contamination will be addressed with monitored natural attenuation (MNA). Groundwater will be monitored for site related contamination (PCE, TCE, cis-DCE, and VC) which will provide an understanding of the (biological activity) breaking down the contamination. It is anticipated that contamination will decrease over a period of 5 years. Reports of the attenuation will be provided at 5 years and active remediation will be proposed if it appears that natural processes alone will not address the contamination. The contingency remedial action will depend on the information collected, but it is currently anticipated that an in-situ technology such as accelerated bioremediation by using slow release compounds would be the expected contingency remedial action.

5. Institutional Control:

- Imposition of an institutional control in the form of an environmental easement for the controlled property that: requires the remedial party or site owner to complete and submit to the Department a periodic certification of institutional and engineering controls in accordance with Part 375-1.8 (h)(3);
- allows the use and development of the controlled property for commercial and industrial uses as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- restricts the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH or County DOH;
- requires compliance with the Department approved Site Management Plan.

6. Site Management Plan:

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a. an Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective.

   Institutional Controls: The Environmental Easement discussed in Paragraph 5 above.

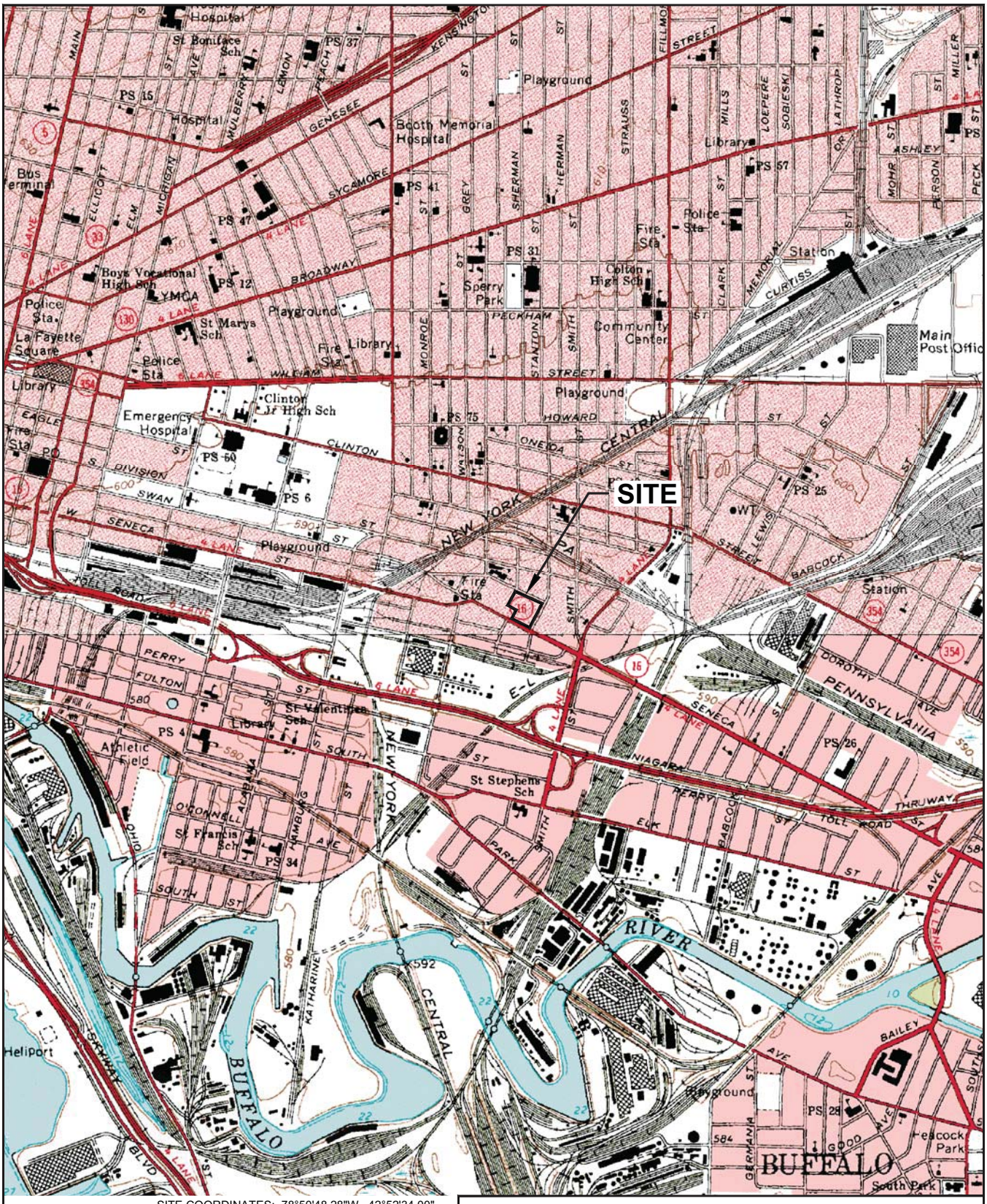
Engineering Controls: The soil cover discussed in Paragraph 3 above.

This plan includes, but may not be limited to:

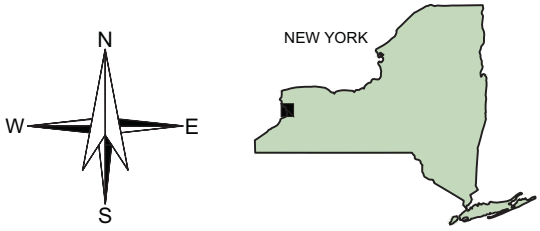
- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- descriptions of the provisions of the environmental easement including any land use and groundwater use restrictions;
- a provision for evaluation of the potential for soil vapor intrusion for any buildings developed on the site, including provision for implementing actions recommended to address exposures related to soil vapor intrusion;
- provisions for the management and inspection of the identified engineering controls;
- maintaining site access controls and Department notification; and
- the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

b. A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:

- monitoring of groundwater to assess the performance and effectiveness of the remedy;
- a schedule of monitoring and frequency of submittals to the Department; and
- monitoring for vapor intrusion for any buildings developed on the site, as may be required by the Institutional and Engineering Control Plan discussed above.



SITE COORDINATES: 78°50'48.28"W, 42°52'34.00"



U.S.G.S. QUADRANGLE: BUFFALO NE, NEW YORK

HALEY & ALDRICH

FORMER AMERICAN LINEN SUPPLY COMPANY
822 SENECA STREET
BUFFALO, NEW YORK

PROJECT LOCUS

SCALE: 1:24000
FEBRUARY 2014

FIGURE 1

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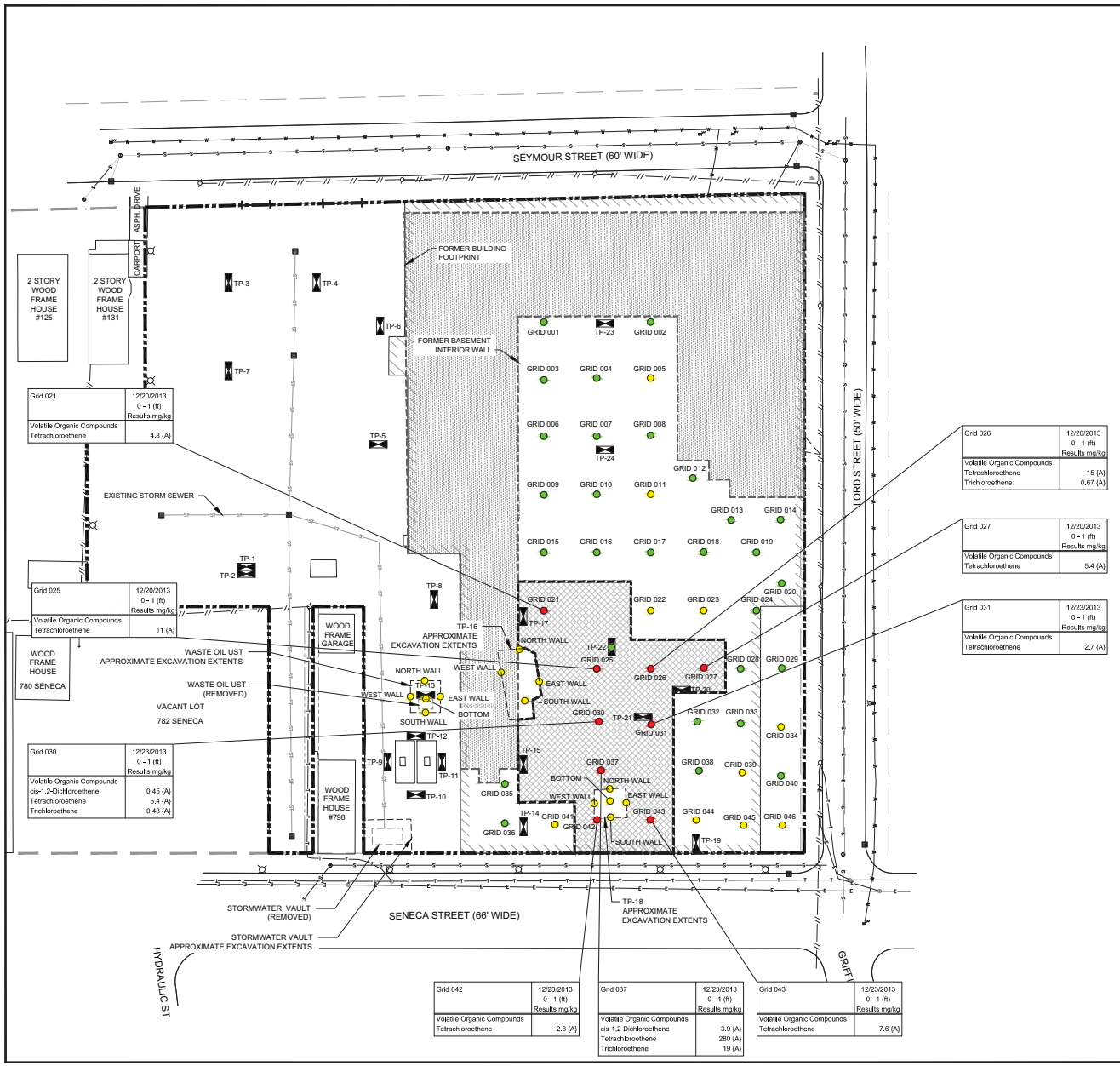


Grid 021	12/20/2013 0 - 1 (ft) Results mg/kg
Volatile Organic Compounds	
Tetrachloroethene	4.8 (A)

Grid 025	12/20/2013 0 - 1 (ft) Results mg/kg
Volatile Organic Compounds	
Tetrachloroethene	11 (A)

Grid 030	12/23/2013 0 - 1 (ft) Results mg/kg
Volatile Organic Compounds	
cis-1,2-Dichloroethene	0.45 (A)
Tetrachloroethene	5.4 (A)
Trichloroethene	0.48 (A)

Grid 026	12/20/2013 0 - 1 (ft) Results mg/kg
Volatile Organic Compounds	
Tetrachloroethene	15 (A)
Trichloroethene	0.67 (A)

Grid 027	12/20/2013 0 - 1 (ft) Results mg/kg
Volatile Organic Compounds	
Tetrachloroethene	5.4 (A)

Grid 031	12/23/2013 0 - 1 (ft) Results mg/kg
Volatile Organic Compounds	
Tetrachloroethene	2.7 (A)

Grid 042	12/23/2013 0 - 1 (ft) Results mg/kg
Volatile Organic Compounds	
Tetrachloroethene	2.8 (A)

Grid 037	12/23/2013 0 - 1 (ft) Results mg/kg
Volatile Organic Compounds	
cis-1,2-Dichloroethene	3.9 (A)
Tetrachloroethene	280 (A)
Trichloroethene	19 (A)

Grid 043	12/23/2013 0 - 1 (ft) Results mg/kg
Volatile Organic Compounds	
Tetrachloroethene	7.6 (A)

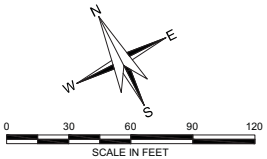
LEGEND

- PROPERTY LINE and Site Boundary
- STORM SEWER LINE
- OVERHEAD POWER
- SANITARY SEWER
- UNDERGROUND TELEPHONE
- UNDERGROUND ELECTRIC
- TP-24 — APPROXIMATE LOCATION OF INSTALLED TEST PIT
- GRID 001 — APPROXIMATE LOCATION OF GRID SAMPLES
- RED DOT INDICATES APPROXIMATE LOCATION OF SAMPLE COLLECTED DURING THE RI/IRM WHERE ONE OR MORE TARGET CVOC COMPOUNDS WERE DETECTED ABOVE CRITERIA AS SHOWN.
- YELLOW DOT INDICATES APPROXIMATE LOCATION OF SAMPLE COLLECTED DURING THE RI/IRM WHERE TARGET CVOC COMPOUNDS WERE NOT DETECTED ABOVE CRITERIA.
- GREEN DOT INDICATES APPROXIMATE LOCATION OF SAMPLE COLLECTED DURING THE RI/IRM WHERE TARGET CVOC COMPOUNDS WERE NOT DETECTED.
- POTENTIAL REMEDIAL ACTION EXCAVATION AREAS, BASED ON 2013 SOIL REMOVAL IRM CONFIRMATION SAMPLING RESULTS. APPROXIMATE AREA : 13,500 SQ.FT.

NOTES

1. ONSITE UTILITY LOCATIONS, TANK LOCATIONS, SOIL BORING LOCATIONS, INTERIOR WELL LOCATIONS, PROPOSED SAMPLING LOCATIONS, INTERIOR BUILDING FEATURES, AND BASEMENT DIMENSIONS ARE APPROXIMATE UNLESS NOTED OTHERWISE.
2. BASEMAP (INCLUDING BEDROCK MONITORING WELL, MONITORING WELL, SOIL VAPOR SAMPLING POINTS, SOIL BORINGS, TEST PITS, CONFIRMATION SAMPLES, AND OTHER REMEDIAL INVESTIGATION AND IRM FEATURES) IS BASED ON ELECTRONIC CAD FILES FROM HOFFMAN LAND SURVEYING & GEOMATICS OF ONTARIO, NEW YORK, OF WHICH THE MOST RECENT VERSION IS DATED 22 JANUARY 2014.
3. SAMPLE DEPTHS SHOWN ARE BASED ON POST-IRM GROUND SURFACE ELEVATIONS.
4. ONLY CHEMICALS SCREENED AGAINST CRITERIA INCLUDE TETRACHLOROETHENE, TRICHLOROETHENE, CIS-1,2-DICHLOROETHENE, AND VINYL CHLORIDE.
5. ONLY RESULT THAT EXCEED CRITERIA ARE SHOWN ON FIGURE.
6. RESULTS SHOWN WITH AN IDENTIFIER {A} EXCEED THE FOLLOWING NYSDEC SOIL CLEANUP OBJECTIVES (SCOs):
   {A} - SITE SPECIFIC GROUNDWATER PROTECTION

VOLATILE ORGANIC COMPOUND	SITE SPECIFIC PROTECTION OF GROUNDWATER SCOs (MG/KG)
TETRACHLOROETHENE	1.8
TRICHLOROETHENE	0.75
CIS-1,2-DICHLOROETHENE	0.25
VINYL CHLORIDE	0.02



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POST-SOIL REMOVAL IRM CONFIRMATION SAMPLES AND PROPOSED EXCAVATION PLAN

SCALE: AS SHOWN
FEBRUARY 2014

FIGURE 2

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