Periodic Review Report (PRR)

Prepared for:

MillRace Commons, LLC
726 Exchange Street, Suite 825
Buffalo, New York 14210

Site Location:

Former American Linen Supply Company
822 Seneca Street
Buffalo, New York 14210

May 2016

Prepared by:

NEU-VELLE LLC

1667 Lake Avenue
Building 59, Suite 101
Rochester, New York 14615
585-313-9683

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Section 1

NEU-VELLE LLC

Executive Summary

1.0 EXECUTIVE SUMMARY

This document is required as an element of the remedial program at the property located at 822 Seneca Street in Buffalo, New York known as the Former American Linen Supply Co Facility (hereinafter referred to as the "Site") under the New York State (NYS) Brownfield Cleanup Program (BCP) administered by New York State Department of Environmental Conservation (NYSDEC). The Site was remediated in accordance with Brownfield Cleanup Agreement (BCA) Index # C915241-03-11, Site #C915241, which was executed on May 17, 2011.

Based on visual inspection of the area, as well as groundwater monitoring results, the site is in compliance with the SMP and all requirements of the plan have been satisfied. In addition, the groundwater monitoring results indicate stable or decreased concentrations as compared to pre-remediation results and target CVOC's do not appear to be migrating off site. Sub-slab vapor in the adjacent residence at 798 Seneca Street is not a concern at this time. Therefore, the remedial objectives/goals for the site are currently being met. However, as previously presented, there is some vegetation growth in the asphalt cover system. The vegetation will be removed and any impact (i.e., hole, crack) will be sealed and/or repaired, as appropriate prior to the next inspection.

This report presents the activities that were conducted to comply with the Site Management Plan, and has been organized into the following sections:

- Section 1 – Executive Summary
- Section 2 – Site Overview
- Section 3 – IC/EC Controls
- Section 4 – Monitoring Plan Compliance
- Section 5 – Operation & Maintenance Plan Compliance
- Section 6 – Conclusions and Recommendations

Section 2

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Site Overview

2.0 SITE OVERVIEW

2.1 General

This section presents a description of the site as well as remedial activities that were performed as part of the BCP Program.

2.2 Background

AmeriPride Services, Inc. (AmeriPride entered into a BCA with the NYSDEC to remediate a 2.91 acre property in Buffalo, New York. The BCA required AmeriPride to investigate and remediate contaminated media at the site.

After completion of the remedial work described in the approved Remedial Action Work Plan (RAWP), some contamination was left in the subsurface at this site. Therefore, a Site Management Plan (SMP) was developed to manage remaining contamination at the Site until the Environmental Easement is extinguished in accordance with ECL Article 71, Title 36.

This SMP was developed by Haley & Aldrich of New York, on behalf of AmeriPride in accordance with the requirements presented in NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation, dated May 2010, and the guidelines provided by NYSDEC.

2.3 Site Location and Description

The site is located in the City of Buffalo, Erie County, New York and is identified as the parcel with section 122.27, Block 1 and Lot 4 on the City of Buffalo Tax Map. The site is an approximately 2.91-acre area bounded by Seymour Street beyond which are residential properties to the north, Seneca Street beyond which is a vacant former industrial property to the south, Lord Street beyond which are industrial properties and the flying Bison Brewery to the east, vacant and commercial properties to the southwest, and residential properties to the northwest. A figure showing the site location and boundaries of the site is provided in Appendix A.

2.4 Site History

According to a Phase I Environmental Site Assessment Report by C.T. Male Associates, P.C., dated December 2004, the site building was first developed in 1910. Prior to 1910, the site was occupied by residential and commercial properties. Between 1910 and 1978, the site was used as a book binding and printing facility.

Coverall Service and Supply Co., first occupied the Site in 1978 and was a uniform cleaning facility. The facility was used for dry cleaning operations until 1985. Based on past information, the facility performed dry cleaning and used tetrachloroethylene (PCE) as part of its process between 1978 and 1985. The laundry operations occupied the first floor of the site building as well as portions of the basement. Thorner Sydney Press occupied the second floor of the building as well as portions of the basement until 1997.

In April 2004, laundering operations ceased at the site. It was then used as a laundry depot from April 2004 to spring 2005 and then as a fleet vehicle maintenance shop until July 2005. Operations moved out of the building at the end of July 2005, and it has been vacant since. The Site was acquired by Mill Race Commons, LLC on January 13, 2014.

2.5 Remedial Investigation

A Remedial Investigation (RI) was performed to characterize the nature and extent of contamination at the site. The RI determined that contaminants of concern (COCs) were detected at concentrations in site fill and native soil above relevant standards, criteria, and guidelines (SCGs). COCs were identified based on the multiple detection of any one of a broad suite of organic and inorganic substances that are related to the former site operations and were present at concentrations higher than the relevant SCGs. The SCGs for the site include the Part 375 Restricted Use Soil Cleanup Objectives (SCOs) for protection of groundwater, commercial use, and industrial use; and the NYS Ambient Water Quality Standards and Guidance Values (class GA) specified in NYSDEC TOGS 1.1.1 for groundwater.

Remedial investigations for soil conditions included borings, test pits, and surface samples collected from the former parking lot area, the soil beneath the basement slab, and the soil/fill beneath the slab of the slab-on-grade portion of the former building. Groundwater samples were collected from discrete locations and from permanent monitoring wells located both on and offsite. In addition to the soil and groundwater investigation activities, a soil vapor investigation was conducted in the basement of 798 Seneca Street, which is adjacent to the site and a Gamma walkover survey was conducted at the site in August 2014. The site was traversed, and Gamma readings were compared to background.

The COCs identified for Site soils included;

- Target chlorinated volatile organic compounds (CVOCs): tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE), trans-1,2-dichloroethene (trans-1,2-DCE), and vinyl chloride in soil.

- Polycyclic aromatic hydrocarbons (PAHs) and heavy metals (arsenic, copper, lead, and mercury) in historic fill.

- Target CVOC concentrations detected offsite have been very close to or below the groundwater standards, and are indicative of natural attenuation and the downgradient edge of groundwater impacts.

2.5 Remedial Activities/Actions

The site was remediated in accordance with the NYSDEC-approved work plans. The following presents a summary of the remedial activities conducted at the site.

- Removal of former industrial site features including a sewer vault, USTs, and former building components and excavation of soil/fill exceeding Commercial/Industrial SCOs;
- Construction and maintenance of a soil cover system consisting of at least one foot of NYSDEC-approved clean cover material placed over a demarcation layer over the eastern, landscaped portion of the site to prevent human exposure to remaining contaminated soil/fill remaining at the site;
- Maintenance of an impervious asphalt cover over the western, paved area of the site;
- Execution and recording of an environmental easement to restrict land use and prevent future exposure to any contamination remaining at the site.
- Development and implementation of a Site Management Plan (SMP).
- Removal of contaminated materials from the site
- Removal of basement cisterns
- Removal of impacted floor slab and soil
- Removal of stormwater vault
- Removal of waste oil UST
- Removal of fill and soils in the former dry cleaning area
- Backfill and placement of cover system

Section 3

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IC/EC CONTROLS

3.0 IC/EC CONTROLS

3.1 General

As a result of contaminated soil, groundwater, and soil vapor which exists beneath the site following remedial activities, Institutional Controls and Engineering Controls and (IC/ECs) are required to protect human health and the environment. The following presents the IC/ECs used at the site.

3.2 Engineering Controls

A cover system has been installed at the site to prevent exposure to remaining contamination above the commercial use and protection of groundwater SCOs in soil/fill. The cover system is comprised of a minimum of 12 inches of clean soil, asphalt pavement, or concrete cover as follows:

- Pavement Area - The areas that were formerly parking lots and driveways associated with the former dry cleaner. The cover system in this area consists of asphalt and/or concrete.

- Former Building Slab Area - The area that was the slab-on-grade portion of the former building is improved with a demarcation layer consisting of geotextile fabric placed over remaining historic fill and native soils above which is a minimum of 12 inches of clean soil. The area was seeded for aesthetic purposes and erosion control.

- Former Building Basement Area - The area that was the location of the basement of the former Site building. The basement was backfilled with up to 10 feet of clean soil. The area was seeded for aesthetic purposes and erosion control.

3.3 Institutional Controls

Institutional Controls are required at the site to implement, maintain and monitoring the cover system, prevent future exposure to remaining contamination, and limit the use and development of the site to commercial or industrial uses only. These Institutional Controls utilized at the site include:

- Compliance with the environmental easement;

- The Site may only be used for commercial or industrial use as defined by the NYSDEC;

- Proper operation and maintenance of the cover system;

- Annual inspection of cover system;
- The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or the Erie County Department of Health;
- Groundwater and other environmental or public health monitoring must be performed as defined in this SMP;
- Data and information pertinent to Site Management of the Controlled Property must be reported at the frequency and in a manner defined in this SMP;
- All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with the SMP;
- Monitoring to assess the performance and effectiveness of the remedy must be performed as defined in the SMP;
- Operations, maintenance, monitoring, inspection, and reporting of any mechanical or physical components of the remedy shall be performed as defined in the SMP;

3.3 IC/EC Compliance

As presented above, all Institutional and Engineering controls have been implemented at the site as required by the SMP. Certification of the implementation of the controls is presented on the Institutional and Engineering Controls Certification Form included in Appendix B.

Section 4

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Monitoring Plan Compliance

4.0 MONITORING PLAN COMPLIANCE

4.1 General

In accordance with the SMP, a site Monitoring Plan was developed. The objective of the plan is to evaluate the performance and effectiveness of the remedy and to reduce or mitigate contamination at the site. The monitoring plan presents the methods to be used for:

- Sampling and analysis of all appropriate media (e.g., groundwater, indoor air, soil vapor, soils);
- Assessing compliance with applicable NYSDEC standards, criteria and guidance;
- Assessing achievement of the remedial performance criteria.
- Evaluating Site information periodically to confirm that the remedy continues to be effective in protecting public health and the environment; and
- Preparing the necessary reports for the various monitoring activities.

4.2 Monitoring Requirements

Periodic monitoring of the remedy and overall reduction of the on-site contamination will be conducted in accordance with the table below for first 5 years following receipt of the COC. The frequency thereafter will be determined by NYSDEC based on the trends in contaminant levels in groundwater in the affected areas and the effectiveness of the remedy in achieving the remedial goals for the site.

Monitoring Program	Frequency	Matrix	Analysis
Cover System	Annual Inspection	N/A	Visual Only
Groundwater	Semi-annual for 2 years and annual thereafter	Groundwater	Target CVOC's (PCE, TCE, cis-1,2-DCE, Vinyl chloride)
Soil Vapor Indoor Air	If 2 consecutive groundwater monitoring events indicate increase in Target CVOC concentrations at MW-102R, then soil vapor and indoor air sampling may be warranted at the 798 Seneca Street	Soil Vapor Indoor Air	Target CVOC's (PCE, TCE, cis-1,2-DCE, Vinyl chloride)

4.2.1 Cover System

In accordance with the SMP, the cover system must be maintained at all times and inspected on an annual basis to insure integrity. Any areas of significant distress will be noted and repaired as appropriate based on the following requirements.

Asphalt Cover

A summary of the key maintenance concerns and the respective corrective action is as follows:

- $^1/_2$ -inch or greater cracks or pot Holes exposing the sub-base will be sealed or repaired to restore the asphalt cover.
- Vegetation will be removed and the associated impact, hole, or crack will be sealed or repaired to restore the asphalt cover.

Vegetated Cover

A summary of the key maintenance concerns and the respective corrective action is as follows:

- Areas where erosion problems (i.e., rills or gullies) are observed will be repaired by re-grading the localized area, adding the required fill material and/ or topsoil, and reseeding/ replanting as necessary.
- If burrowing animals are observed breaching the soil cover, as evidenced by exposed fill material, they will be eradicated by a licensed exterminator.

4.2.2 Media Monitoring

In accordance with the SMP, the following presence the media monitoring that will be performed at the site.

Groundwater

Groundwater monitoring will be performed on a semiannual basis for two years following implementation of the remedy. Following the two years of semi-annual monitoring, the monitoring frequency may be revised to annually with approval from the NYSDEC based on acceptable monitoring results. The groundwater will be analyzed for the target CVOCs, which include tetrachloroethene, trichloroethene, cis-1,2-dichloroethene, and vinyl chloride. A summary of the groundwater monitoring well network is presented in the table below. Repairs and/or replacement of wells will be performed based on assessments of structural integrity and overall performance.

Well ID	Location	Casing Diameter	Screen Depth (feet)	Analytes Tested
MW-101	Onsite	2 inch	13.2 – 18.2	Target CVOVs
MW-102R	Onsite	2 inch	12 -17	Target CVOVs
MW-103	Onsite	2 inch	10.9 – 15.9	Target CVOVs
MW-104	Onsite	2 inch	11.3 – 16.3	Target CVOVs
MW-105	Onsite	2 inch	10.6 – 15.6	Target CVOVs
MW-106	Onsite	2 inch	9.6 – 14.6	Target CVOVs
MW-301	Offsite	2 inch	13.5 – 18.5	Target CVOVs
MW-302	Offsite	2 inch	12.8 – 17.5	Target CVOVs
MW-303	Offsite	2 inch	11.1 – 15.8	Target CVOVs

Soil Vapor

Testing was conducted in December 2013 at the adjacent property locate at 798 Seneca Street. Based on this testing, CVOC's were detected in the sub-slab vapor and indoor air at that time. The detections however were well below the October 2006 New York State Department of Health (NYSDOH) Soil Vapor Intrusion Guidance thresholds for monitoring or mitigation. In the event that results of ongoing groundwater monitoring indicate that there is an increasing trend of CVOC's in MW-102R, and the adjacent property at 798 Seneca Street continues to be utilized as a residence, indoor air and sub-slab vapor monitoring may be warranted.

4.3 Conclusions and Recommendations

Based on inspection of the cover system, no significant deficiencies have been observed during this period inspection. However, there is some vegetation growth in the asphalt cover system. The vegetation will be removed and any impact (i.e., hole. crack) will be sealed and/or repaired, as appropriate. In addition, the groundwater monitoring results (Appendix C) indicate stable or decreased concentrations as compared to pre-remediation results and target CVOC's do not appear to be migrating off site. Therefore, sub-slab vapor in the adjacent residence at 798 Seneca Street is not a concern at this time. In the event that concentrations of CVOC's in groundwater monitoring well MW-102R increase, additional indoor air sampling will be warranted in the future.

Section 5

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Operation & Maintenance Plan Compliance

5.0 OPERATION & MAINTENANCE PLAN COMPLIANCE

The site remedy does not rely on any mechanical systems, such as sub-slab depressurization systems, or air sparge/soil vapor extraction systems to protect public health and the environment. Therefore, operation and maintenance of such components is not required for the site at this time.

Section 6

NEU-VELLE LLC

Conclusions and Recommendations

6.0 CONCLUSIONS AND RECOMMENDATIONS

In conclusion, based on visual inspection of the area, as well as groundwater monitoring results, the, the site is in compliance with the SMP and all requirements of the plan have been satisfied. In addition, the groundwater monitoring results indicate stable or decreased concentrations as compared to pre-remediation results and target CVOC's do not appear to be migrating off site. Therefore, sub-slab vapor in the adjacent residence at 798 Seneca Street is not a concern at this time. In the event that concentrations of CVOC's in groundwater monitoring well MW-102R increase, additional indoor air sampling will be warranted in the future.

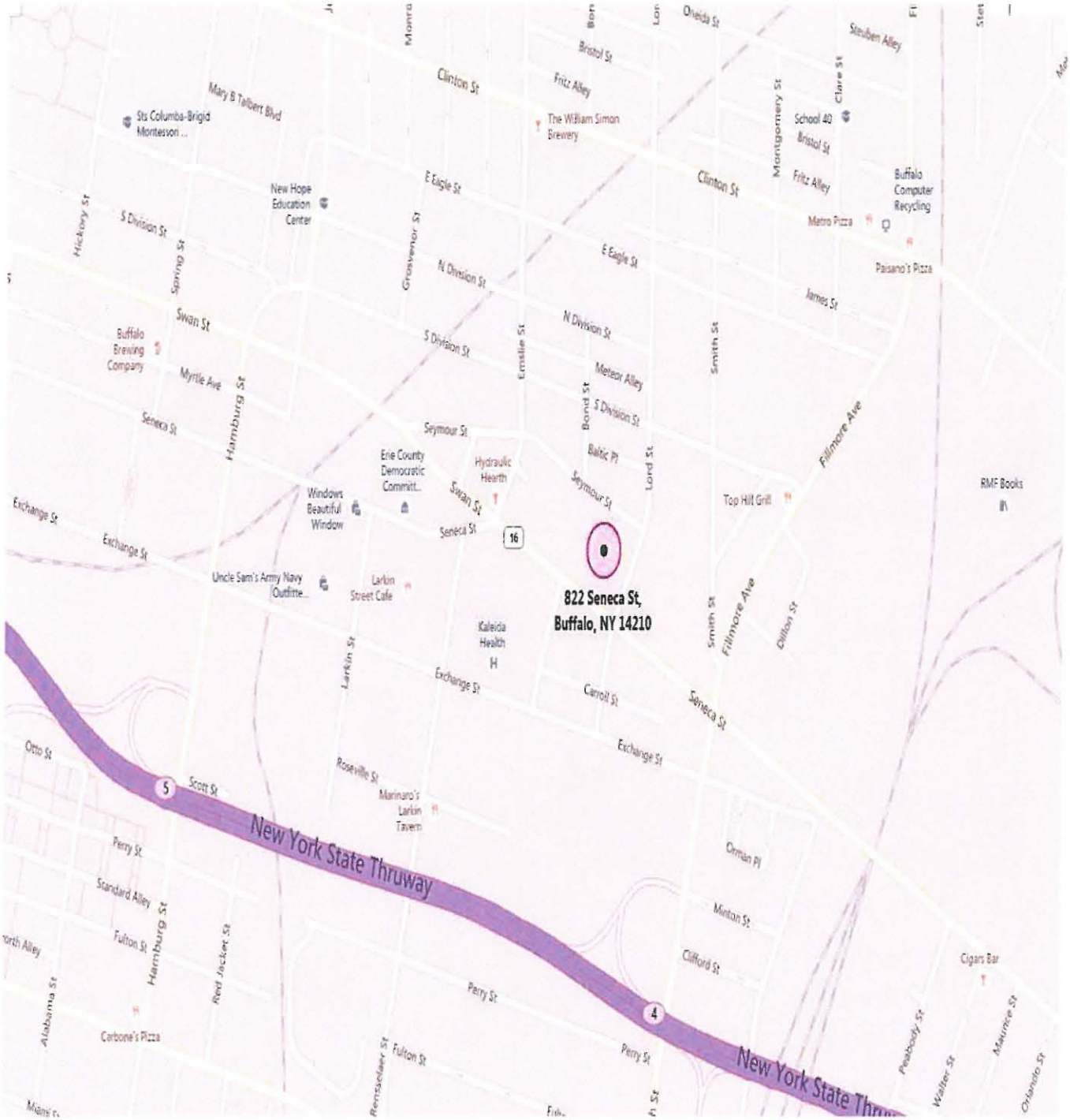
However, as previously presented, there is some vegetation growth in the asphalt cover system. The vegetation will be removed and any impact (i.e., hole. crack) will be sealed and/or repaired, as appropriate prior to the next inspection.

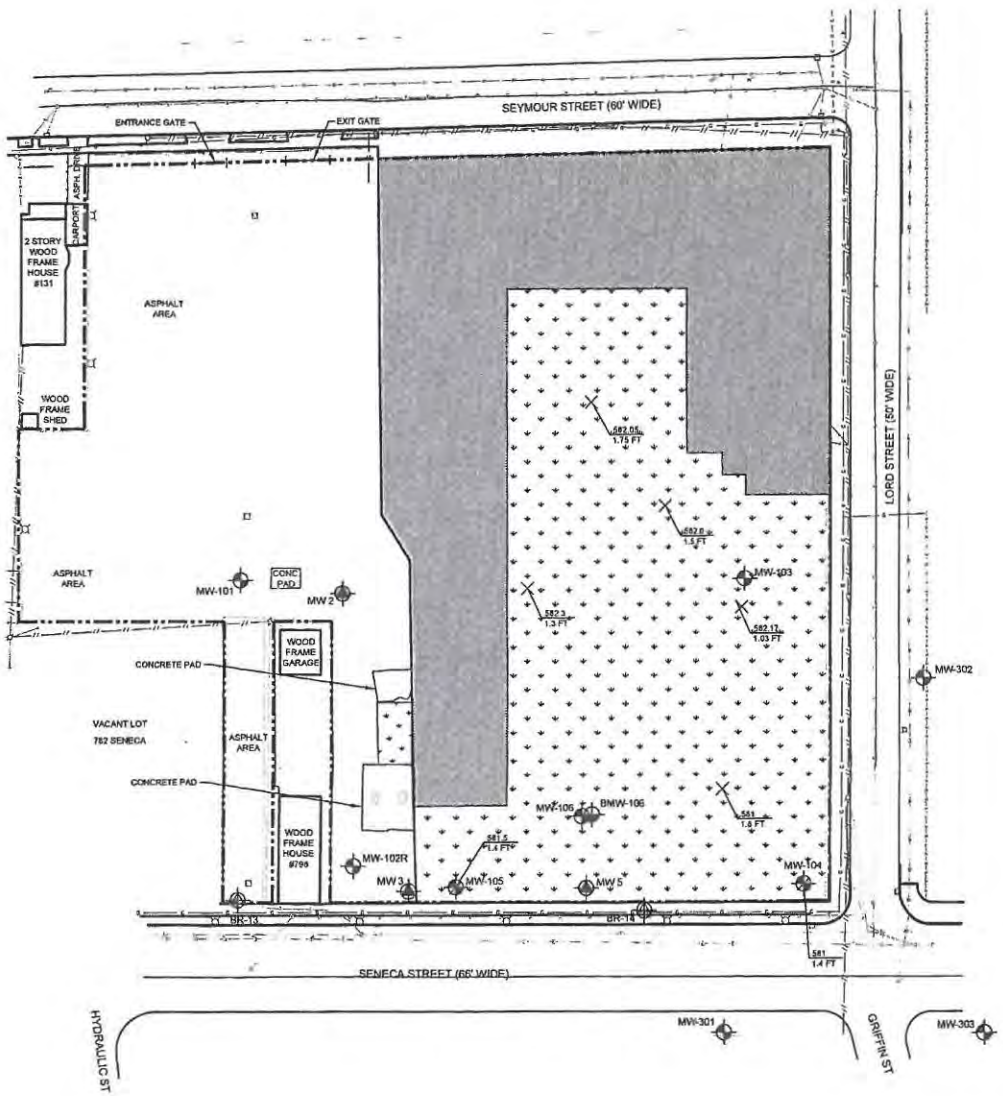
Appendix A

NEU-VELLE LLC

Figures

Figure 1 - Site Location Map





LEGEND

- PROPERTY AND FENCE LINE
- FORMER BUILDING FOOTPRINT
- FORMER BUILDING BASEMENT AREA (FROM WHICH THE BASEMENT WAS REMOVED AND BACKFILLED WITH APPROXIMATELY 7-10 FT OF NYSDEC-APPROVED COVER. AREA WAS SEEDED
- FORMER BUILDING SLAB AREA (DEMARCATION LAYER WITH A MINIMUM 1-2 FEET OF CLEAN COVER)
- PAVEMENT AREA (ASPHALT OR CONCRETE)
- CATCH BASIN
- SANITARY SEWER LINE
- WATER LINE
- UNDERGROUND TELEPHONE LINE
- OVERHEAD TELEPHONE LINE
- ELECTRICAL LINE
- SURVEYED LOCATION OF BEDROCK MONITORING WELL INSTALLED IN 2012
- MW-101 SURVEYED LOCATION OF MONITORING WELL INSTALLED IN 2012 AND 2013
- MW-303 SURVEYED LOCATION OF OFF-SITE MONITORING WELL INSTALLED IN 2013
- SURVEYED LOCATION OF MONITOR WELLS INSTALLED BY ENSR IN DECEMBER 2005
- SURVEYED LOCATION OF MONITOR WELLS INSTALLED BY OTHERS FOR ADJACENT PROPERTY.
- APPROXIMATE LOCATION OF DEMARCATION LAYER DEPTH MEASUREMENTS ELEVATION
- 582.1 / 1.6 FT ELEVATION / DEPTH BELOW GROUND SURFACE

NOTES

1. FORMER BASEMENT DIMENSIONS ARE APPROXIMATE.
2. BASEMAP IS BASED ON ELECTRONIC CAD FILES FROM HOFFMAN LAND SURVEYING & GEOMATICS OF ONTARIO, NEW YORK, OF WHICH THE MOST RECENT VERSION IS DATED 1 OCTOBER 2014.
3. SITE BOUNDARY AND PROPERTY BOUNDARY ARE THE SAME.

N E S W

0 30 60 90 120

SCALE IN FEET

HALEY & ALDRICH

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

LOCATION OF COVER SYSTEM TYPES

SCALE: AS SHOWN
OCTOBER 2014

FIGURE 9

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Appendix B

NEU-VELLE LLC

IC/EC Certification Form

Enclosure 2

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

Site Details — Box 1

Site No. C915241

Site Name Former American Linen Supply Company Facility

Site Address: 822 Seneca Street Zip Code: 14210
City/Town: Buffalo
County: Erie
Site Acreage: 2.9

Reporting Period: December 23, 2014 to March 24, 2016

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

Box 2

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

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

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

Signature of Owner, Remedial Party or Designated Representative

JOSEPH A. PETRELLA
FOR MILL RACE COMMONS LLC

6.3.16
Date

Box 2A

	YES	NO
8. Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?	☐	☒
9. Are the assumptions in the Qualitative Exposure Assessment still valid? (The Qualitative Exposure Assessment must be certified every five years)	☒	☐

If you answered YES to question 8, include documentation or evidence that documentation has been previously submitted with this certification form.

If you answered NO to question 9, the Periodic Review Report must include an updated Qualitative Exposure Assessment based on the new assumptions.

SITE NO. C915241

Box 3

Description of Institutional Controls

Parcel	Owner	Institutional Control
122.27-1-4	Mill Race Commons, LLC	Soil Management Plan Monitoring Plan Site Management Plan Ground Water Use Restriction Landuse Restriction IC/EC Plan

1. Prohibition of use of groundwater.
2. Landuse Restriction for Commercial or Industrial use.
3. Soil Management or Excavation Work Plan for any future intrusive work.
4. Soil Vapor Intrusion Evaluation for any proposed structures.
5. Monitoring Plan for Cover System and Groundwater. Soil Vapor/Indoor monitoring at 798 Seneca Street property, if warranted.

Box 4

Description of Engineering Controls

Parcel	Engineering Control
122.27-1-4	Cover System

Cover System is comprised of a minimum 12 inches of clean soil, asphalt pavement, or concrete cover.

Box 5

Periodic Review Report (PRR) Certification Statements

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

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

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

YES	NO
☒	☐

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

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

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

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

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

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

YES	NO
☒	☐

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

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

Signature of Owner, Remedial Party or Designated Representative

JOSEPH A. PETRELLA

FOR MILL RACE COMMONS LLC

6.3.16

Date

IC CERTIFICATIONS
SITE NO. C915241

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1,2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I JOSEPH A. PETRELLA at 726 EXCHANGE STREET, BFLO, N.Y.,
print name print business address

am certifying as OWNER (MILL RALE COMMONS LLC) (Owner or Remedial Party)

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

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

6.3.16
Date

IC/EC CERTIFICATIONS

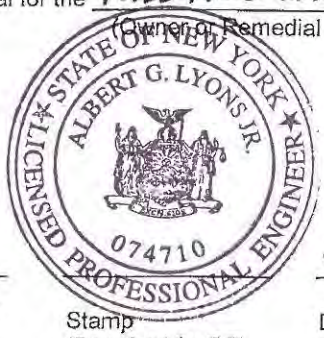
Box 7

Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Albert G. Lyons, P.E. (print name) at NEV-VELLE LLC 1667 LAKE AVE., ROCHESTER, NY, (print business address)

am certifying as a Qualified Environmental Professional for the MILL RALE COMMONS LLC (Owner or Remedial Party)



Albert G Lyons, Jr. — Signature of Qualified Environmental Professional, for the Owner or Remedial Party, Rendering Certification

Stamp (Required for PE)

5/18/16 — Date

Appendix C

NEU-VELLE LLC

Groundwater Monitoring Report

HALEY & ALDRICH OF NEW YORK
200 Town Centre Drive
Suite 2
Rochester, NY 14623
585.359.9000

31 March 2016
File No. 37319-060

Ameripride Services, Inc.
650 Industrial Boulevard, NE
Minneapolis, MN 55413

Attention: Mr. Randy Cook, P.E., CHMM
Environmental Manager

Subject: 2015 Groundwater Monitoring Summary Report No. 1
Former American Linen Supply Co Facility
BCP Site Number: C915241
822 Seneca Street
Buffalo, New York

Ladies and Gentlemen:

Haley & Aldrich of New York (Haley & Aldrich) is submitting this 2015 Groundwater Monitoring Summary Report summarizing the results from groundwater sampling events completed in May and November, 2015 at the Former American Linen Supply Co. Facility site located at 822 Seneca Avenue, in Buffalo, New York (the "Site"). The Site was investigated and remediated under the New York State Department of Environmental Conservation's (NYSDEC) Brownfield Cleanup Program (BCP). The Site received a Certificate of Completion (COC) from the NYSDEC in December 2014. The groundwater monitoring described herein was completed in accordance with the Former American Linen Supply Co. Facility Site Management Plan, dated October 2014 (SMP) and the site access agreement dated 13 January 2014 between AmeriPride Services, Inc. (the Responsible Party and under the BCP, and the previous property owner) and Mill Race Commons, LLC (the current property owner as of 2013).

Prior to remediation, the site was most recently operated as an industrial dry cleaning facility and industrial launderer. Dry cleaning ceased at the property in 1985. Operation of the launderer ceased in 2005. Remedial investigations and subsequent remedial actions were undertaken between 2011 and 2014. Contaminants of concern identified included dry cleaning solvent-related compounds in soil, groundwater, and soil vapor, specifically tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE), trans-1,2-dichloroethene (trans-1,2-DCE), and vinyl chloride (VC). Periodic groundwater monitoring for those compounds is a requirement of the SMP.

This report presents the groundwater monitoring results from 2015 and provides an assessment of the results in accordance with the annual reporting requirements prescribed in Section 3.3 of the SMP.

SAMPLING EVENTS AND METHODOLOGY

Groundwater sampling was performed by Haley & Aldrich for AmeriPride Services, Inc. on 5 May 2015 and 23 November 2015, in accordance with the requirement for semi-annual sampling frequency for the two years following completion of the remedy as prescribed in Section 3.3 of the SMP. Monitoring wells MW-101, MW-102R, MW-103, MW-105, MW-106, MW-301, and MW-303 (see Figure 1) were sampled. MW-302, also part of the program, could not be located and was likely destroyed during construction and paving of an adjacent property across Lord Street. A magnetometer was used in an attempt to detect the well lid or road box beneath the pavement and concrete proximate to the surveyed location of MW-302, but detection efforts were unsuccessful. Following the May sampling event, the NYSDEC was notified of the efforts made to locate the well and the assumption that the well had been destroyed or paved over. Well locations and site features are detailed on the attached site plan, Figure 1.

Well Inspections and Groundwater Level Readings

The integrity of each well was observed and needed repairs, if any, were recorded on the Static Water Levels (see Appendix A) form during each sampling event. Well repairs including replacement of missing locks and damaged well caps that were noted during the May 2015 sampling event were made during the November 2015 sampling event. An additional well condition observation of note was made during the May 2015 sampling event regarding the riser pipe of MW-104 having come unseated from the riser pipe below. This condition may impact the ability to precisely measure the depth to groundwater and well depth. Should this condition interfere with future measurement and sampling of the well, an appropriate remedy will be implemented.

At the start of each sampling event, the depth to groundwater was measured in the wells listed above. The depth to groundwater measurements were used to prepare groundwater contours for the 2015 events which are shown on Figures 2 & 3.

Groundwater Sampling

The wells were sampled in accordance with the methods outlined in Section 3.3.1.1 of the SMP. Specifically, each well was purged using a disposable polypropylene bailer until three well volumes were removed or the well was dry, whichever occurred first. Samples were collected into laboratory-supplied glassware immediately following purging.

Samples were stored on ice and relinquished to Alpha Analytical Laboratories at the end of each day. Samples were analyzed for Target CVOCs only (PCE, TCE, cis-1,2-DCE, trans-1,2-DCE, and VC) by EPA Method 8260. The data were validated per the quality assurance/quality control requirements in the SMP. Copies of the data usability summary reports (DUSRs) are included in Appendix B. The groundwater data was found to be 100% usable. Analytical results were compared to NYSDEC

groundwater criteria[1] per the SMP, and further described below. The analytical data were submitted to the NYSDEC electronically per their EQuIS filing requirements on 31 March 2016.

Purge water from the sampling events were containerized during each event and staged onsite in 55-gallon steel, open-top drums. A request for "contained-in" determination was submitted to NYSDEC on 19 January 2016, and a determination was received on 20 January 2016 that the wastes may be handled and disposed of as non-hazardous. The purge water drums were removed from the site by Op-Tech Environmental Services, Inc. on 21 July 2015 and 29 January 2016 and disposed as non-hazardous waste at Covanta Niagara in Niagara Falls, New York. Waste disposal documentation is included in Appendix C.

RESULTS AND CONCLUSIONS

A summary of the results can be found on Table I, which also includes the results of previous sampling events. The recent results are described below.

- **Upgradient Wells (MW-101, MW-102R, MW-103):** Concentrations of Target CVOCs were not detected above laboratory detection limits in MW-101 or MW-103 samples which is consistent with the previous sampling event.

  Target CVOCs were not detected in the MW-102R samples above laboratory detection limits with the exception of VC which was detected at 2.8 µg/L in both the May and November samples. The NYSDEC groundwater standard and comparison criterion for VC is 2 µg/L. The VC concentrations in MW-102 have decreased markedly since the previous sampling events in 2012 and 2013 when VC concentrations were detected at 54.9 µg/L and 60 µg/L respectively.

- **Source Wells (MW-105, MW-106):** Concentrations of Target CVOCs continue to be detected in samples from MW-105 and MW-106 at concentrations above NYSDEC criteria. The 2015 concentrations may reflect slight seasonal fluctuation, but remain substantially lower than the pre-remediation concentrations detected in 2012. Overall trends from these wells are shown on Figure 4.

- **Downgradient Wells (MW-104, MW-301, MW-303):** Concentrations of Target CVOCs were not detected above laboratory detection limits in the downgradient wells during the 2015 sampling events.

The 2015 results indicate stable or decreased concentrations as compared to pre-remediation results and may reflect slight seasonal fluctuation. Target CVOCs do not appear to be migrating off site. Per the SMP, potential evaluation of indoor air and sub-slab vapor in the adjacent residence at 798 Seneca Street may be considered in the future if concentrations of CVOCs in MW-102R indicate an increasing trend. Target CVOCs remain below laboratory detection limits or have decreased substantially in MW-

[1] New York State Department of Environmental Conservation Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1 Ambient Water Quality Standards and Guidance Values, Class GA, dated June 1998, modified per the April 2000 addendum.

102R since the previous sampling event, therefore additional indoor air sampling at the 798 Seneca Street residence does not appear to be warranted at this time.

Per to the SMP monitoring plan, semi-annual groundwater sampling will continue through 2016. The next event will be planned in May 2016.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK

Samuel B. Burke
Staff Scientist

Claire L. Mondello, CHMM
Senior Project Manager

cc: Mr. Brian Keegan, AmeriPride Services, Inc.
Rojean E. Rada, Esq., AmeriPride Services, Inc.
Scott Turner, Esq., Nixon Peabody LLP
Mr. Joseph Petrella, Mill Race Commons
Deborah Chadsey, Esq., Kavinoky Cook LLP
Mr. Glenn White, Haley & Aldrich

Attachments:

Table 1 – Groundwater Data Summary Table
Figure 1 – Groundwater Monitoring Well Network
Figure 2 – Groundwater Contour – May 5, 2015
Figure 3 – Groundwater Contour – November 23, 2015
Figure 4 – Groundwater Concentration Trends (MW-105 and MW-106)
Appendix A – Field Forms and Inspection Records
Appendix B – Data Usability Summary Reports
Appendix C – Waste Disposal Documentation

TABLE I
SUMMARY OF ANALYTICAL RESULTS - GROUNDWATER WELLS
FORMER AMERICAN LINEN SUPPLY COMPANY FACILITY
BUFFALO, NY
BCP SITE #C915241

Location	NYSDEC TOGS 1.1.1	MW-101				MW-102 / MW-102R				MW-102				
Sample Date	Class GA	12/11/2012	12/31/2013	05/05/2015	11/23/2015	12/11/2012	12/31/2013	05/05/2015	11/23/2015	12/14/2012 (Dup)	12/14/2012	12/30/2013	05/05/2015	11/23/2015
Sample Depth (bgs)	ug/L	13.2 - 18.2 (ft)				8.7 - 14.7 (ft)				11.2 - 1.62 (ft)				
Volatile Organic Compounds (ug/L)														
cis-1,2-Dichloroethene	5	ND (0.2)	ND (0.7)	ND (2.5)	ND (2.5)	**220**	**14**	ND (2.5)	ND (2.5)	**28.6 J**	**28.9 J**	ND (2.5)	ND (2.5)	ND (2.5)
Tetrachloroethene	5	ND (0.12)	ND (0.18)	ND (0.5)	ND (0.5)	**5.7**	ND (0.18)	ND (0.5)	ND (0.5)	4.8	4.4	ND (0.72)	ND (0.5)	ND (0.5)
trans-1,2-Dichloroethene	5	ND (0.16)	ND (0.7)	ND (2.5)	ND (2.5)	**2**	ND (0.7)	ND (2.5)	ND (2.5)	ND (0.18)	ND (0.18)	ND (2.5)	ND (2.5)	ND (2.5)
Trichloroethene	5	ND (0.15)	ND (0.17)	ND (0.5)	ND (0.5)	**20.5**	ND (0.17)	ND (0.5)	ND (0.5)	3	2.9	ND (0.7)	ND (0.5)	ND (0.5)
Vinyl chloride	2	ND (0.13)	ND (0.33)	ND (1)	ND (1)	**54.9**	**60**	**2.8**	**2.8**	**55.8**	**55.1**	ND (1.3)	ND (1)	0.21 J

Notes and Abbreviations:

1. "ND" indicates analyte not detected above the method detection limit shown.
2. "J" indicates estimated values
2. Bold values exceed the standard/guidance value.
3. Results were compared to the New York State Department of Environmental Conservation (NYSDEC) Ambient Water Quality Standards and Guidance Class GA dated June 1998 modified per the April 2000 addendum (TOGS 1.1.1).
4. For pre-2015 data, only target chlorinated volatile organic compounds shown

TABLE I
SUMMARY OF ANALYTICAL RESULTS - GROUNDWATER WELLS
FORMER AMERICAN LINEN SUPPLY COMPANY FACILITY
BUFFALO, NY
BCP SITE #C915241

Location	NYSDEC TOGS 1.1.1	MW-104					MW-105				MW-106				
Sample Date	Class GA	12/12/2012	12/26/2013	05/03/2015	05/03/2015 (Dup)	11/23/2015	12/13/2012	12/27/2013	05/04/2015	11/23/2015	12/14/2012	12/26/2013	05/05/2015	11/24/2015	11/24/2015 (Dup)
Sample Depth (bgs)	ug/L	11.3 - 16.3 (ft)					11.5 - 16.5 (ft)				11.1 - 16.1 (ft)				
Volatile Organic Compounds (ug/L)															
cis-1,2-Dichloroethene	5	ND (0.2)	ND (0.7)	ND (2.5)	ND (2.5)	ND (2.5)	**99.2 J**	**49**	**37**	**61**	**160 J**	ND (1)	**11**	**13**	**12**
Tetrachloroethene	5	ND (0.12)	ND (0.18)	ND (0.5)	ND (0.5)	ND (0.5)	**21.5 J**	**1**	**0.49 J**	**7.1**	**58.4**	ND (1.8)	ND (0.5)	ND (0.5)	ND (0.5)
trans-1,2-Dichloroethene	5	ND (0.18)	ND (0.7)	ND (2.5)	ND (2.5)	ND (2.5)	ND (0.18)	ND (0.7)	ND (2.5)	**0.9 J**	**1.3**	ND (1)	ND (2.5)	ND (2.5)	ND (2.5)
Trichloroethene	5	ND (0.15)	ND (0.17)	ND (0.5)	ND (0.5)	ND (0.5)	**14.1 J**	**1.3**	**0.5**	**4.1**	**47.4**	ND (1.7)	**0.35 J**	**0.40 J**	**0.41 J**
Vinyl chloride	2	ND (0.13)	ND (0.23)	ND (1)	ND (1)	ND (1)	**4.8 J**	**0.54 J**	**0.41 J**	**3**	**99.7**	**12**	**17**	**26**	**23**

Notes and Abbreviations:

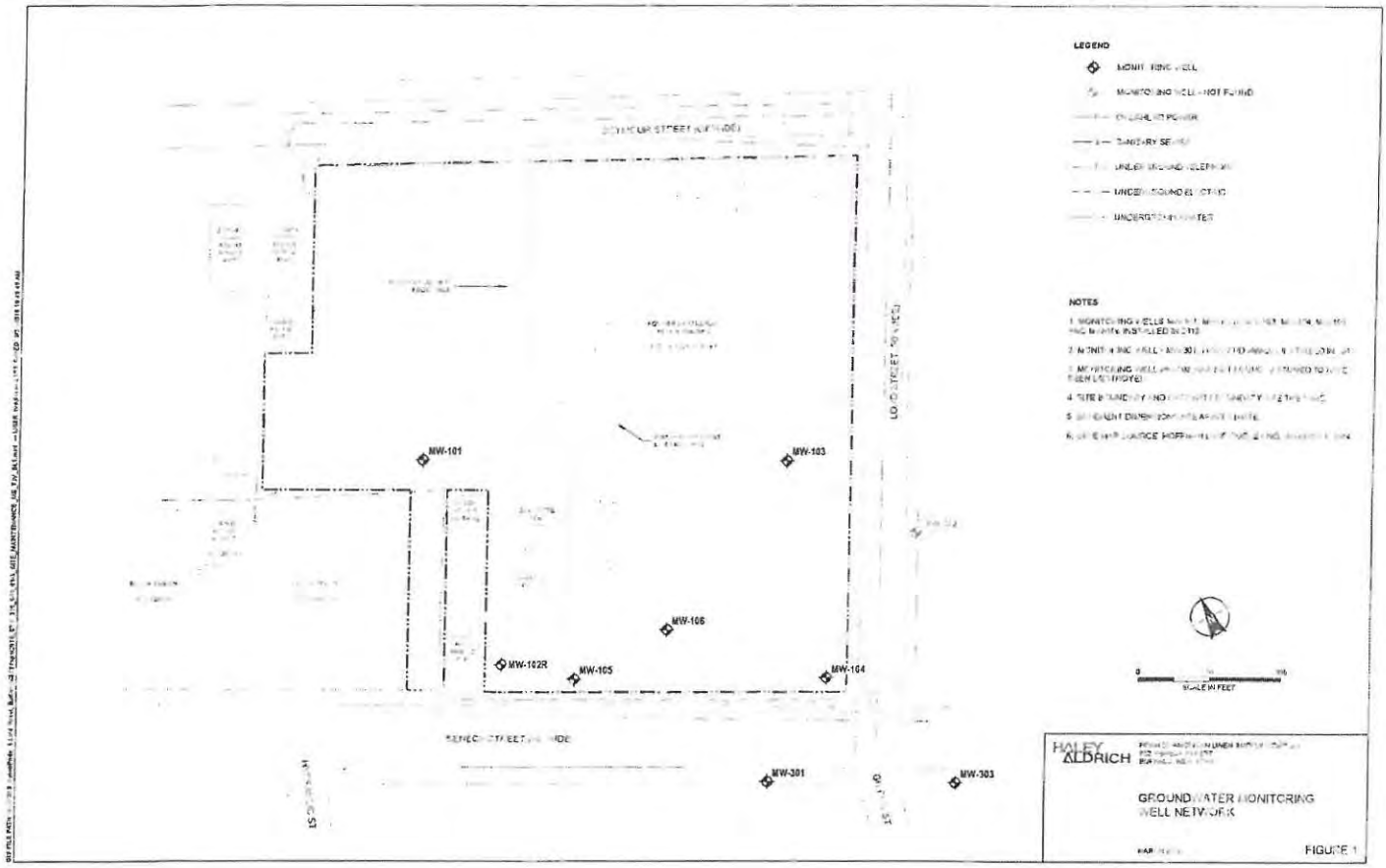
1. "ND" indicates analyte not detected above the method detection limit shown.
2. "J" indicates estimated values.
2. Bold values exceed the standard/guidance value.
3. Results were compared to the New York State Department of Environmental Conservation (NYSDEC) Ambient Water Quality Standards and Guidance Class GA dated June 1998 modified per the April 2000 addendum (TOGS 1.1.1).
4. For pre-2015 data, only target chlorinated volatile organic compounds shown.

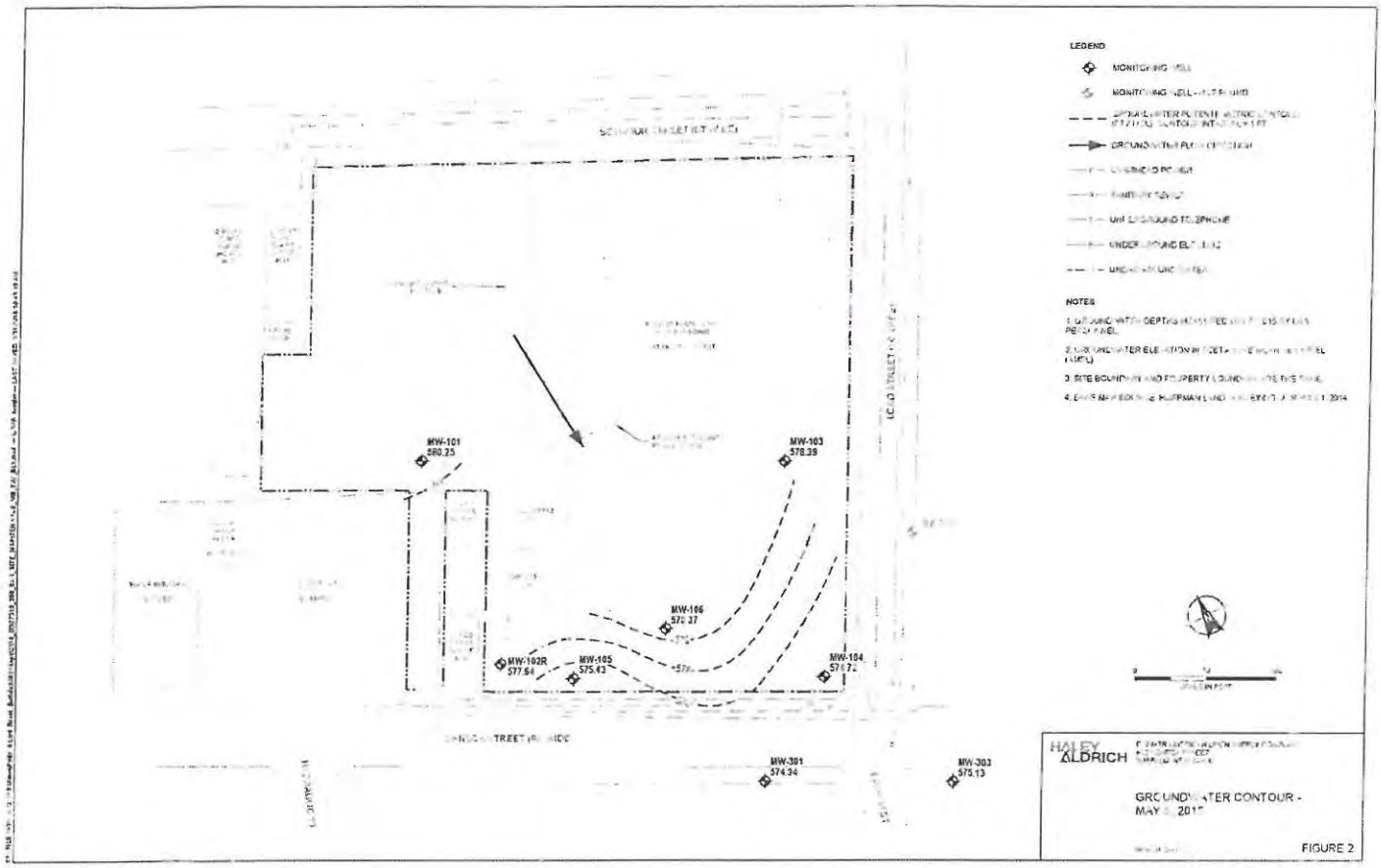
TABLE I
SUMMARY OF ANALYTICAL RESULTS - GROUNDWATER WELLS
FORMER AMERICAN LINEN SUPPLY COMPANY FACILITY
BUFFALO, NY
BCP SITE #C915241

Location	NYSDEC TOGS 1.1.1	MW-301				MW-303			
Sample Date	Class GA	03/27/2013	12/30/2013	05/05/2015	11/23/2015	03/27/2013	12/30/2013	05/05/2015	11/23/2015
Sample Depth (bgs)	ug/L	13.5 - 18.5 (ft)				11.1 - 15.3 (ft)			
Volatile Organic Compounds (ug/L)									
cis-1,2-Dichloroethene	5	ND (0.2)	ND (0.7)	ND (2.5)	ND (2.5)	ND (0.2)	ND (0.7)	ND (2.5)	ND (2.5)
Tetrachloroethene	5	ND (0.12)	ND (0.18)	ND (0.5)	ND (0.5)	ND (0.12)	ND (0.18)	ND (0.5)	ND (0.5)
trans-1,2-Dichloroethene	5	ND (0.18)	ND (0.7)	ND (2.5)	ND (2.5)	ND (0.18)	ND (0.7)	ND (2.5)	ND (2.5)
Trichloroethene	5	4	ND (0.17)	ND (0.5)	ND (0.5)	1.8	ND (0.17)	ND (0.5)	ND (0.5)
Vinyl chloride	2	ND (0.13)	ND (0.33)	ND (1)	ND (1)	ND (0.13)	ND (0.33)	ND (1)	ND (1)

Notes and Abbreviations:

1. "ND" indicates analyte not detected above the method detection limit shown
2. "J" indicates estimated values
2. Bold values exceed the standard/guidance value.
3. Results were compared to the New York State Department of Environmental Conservation (NYSDEC) Ambient Water Quality Standards and Guidance Class GA dated June 1998 modified per the April 2000 addendum (TOGS 1.1.1).
4. For pre-2015 data, only target chlorinated volatile organic compounds shown.


LEGEND
MONITORING WELL
MONITORING WELL - NOT FOUND
OVERHEAD POWER
SANITARY SEWER
UNDERGROUND TELEPHONE
UNDERGROUND ELECTRIC
UNDERGROUND WATER
NOTES
MW-101
MW-103
MW-106
MW-102R
MW-105
MW-104
MW-301
MW-303
0
SCALE IN FEET
HALEY ALDRICH
GROUNDWATER MONITORING WELL NETWORK
FIGURE 1


LEGEND
NOTES
MW-101
580.25
MW-103
578.39
MW-106
576.37
MW-102R
577.64
MW-105
575.43
MW-104
571.72
MW-301
574.34
MW-303
575.13
HALEY
ALDRICH
GROUNDWATER CONTOUR -
MAY 2017
FIGURE 2

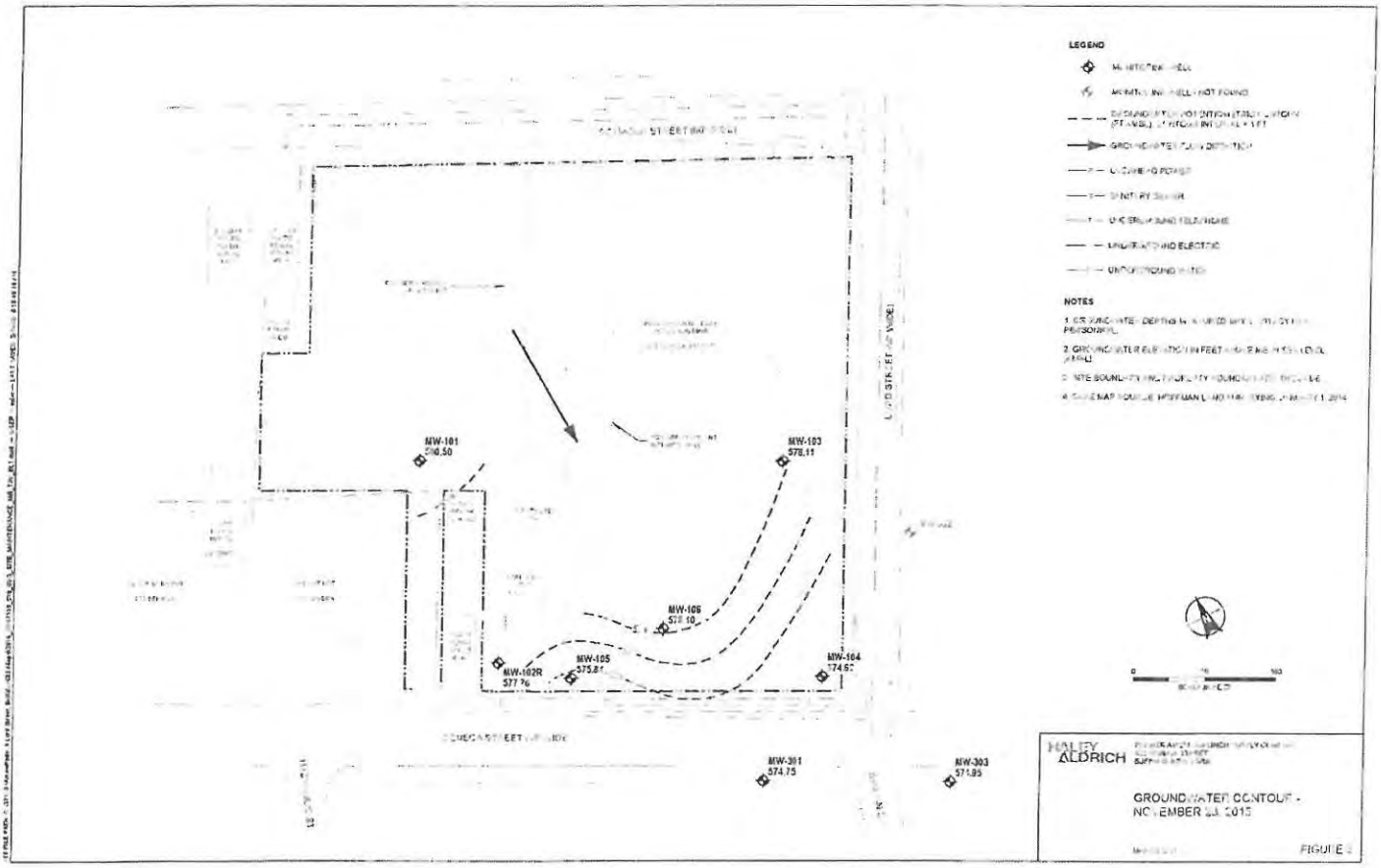
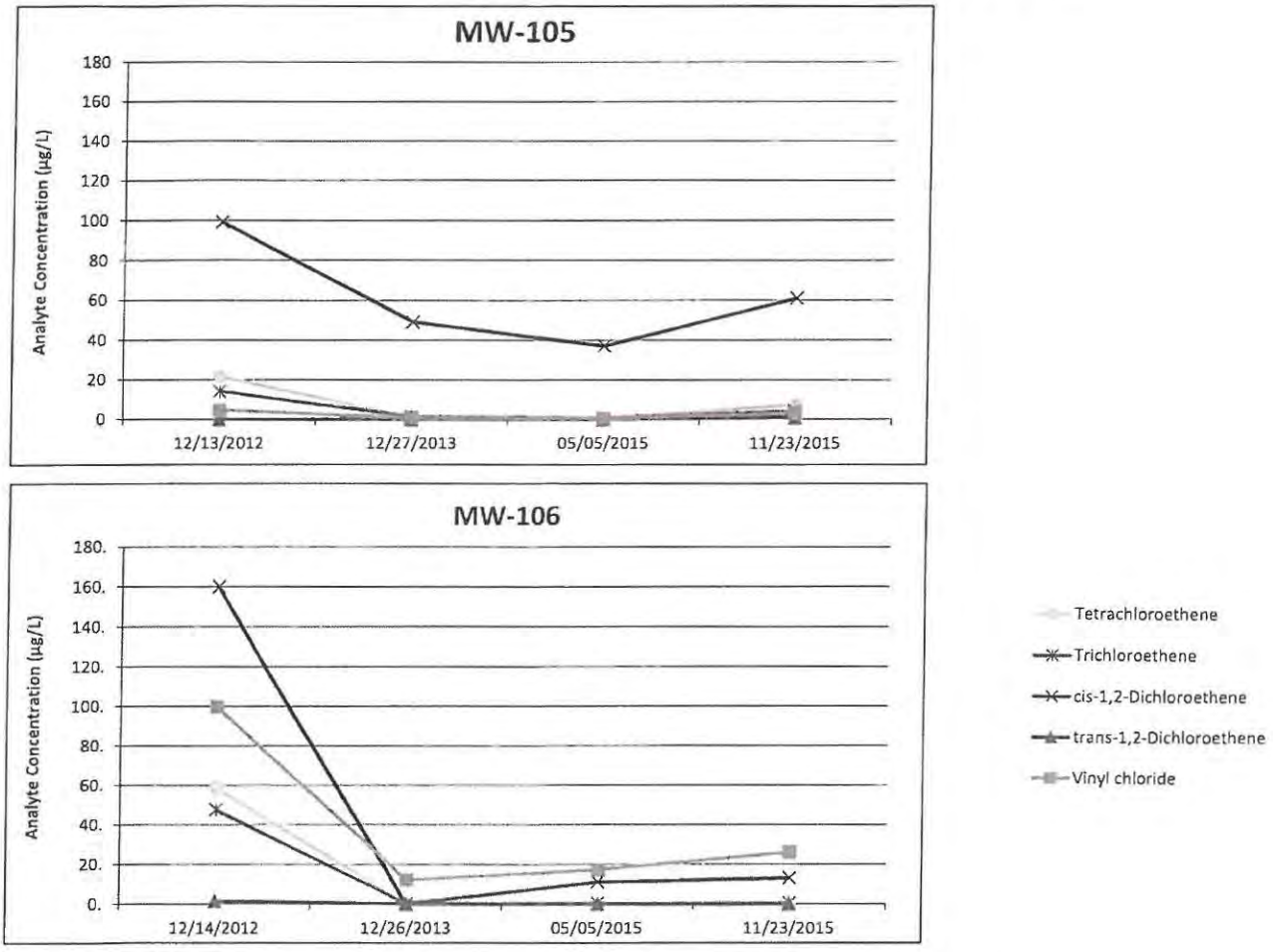

LEGEND
NOTES
MW-101
MW-102R
MW-103
MW-104
MW-105
MW-106
MW-301
MW-303
GROUNDWATER CONTOUR - NOVEMBER 13, 2015
FIGURE 2

Figure 4 - Groundwater Concentration Trends (MW-105 and MW-106)



Haley Aldrich of New York
G:\37319 (AmeriPride, 8 Lord Street, Buffalo)\060 - Site Management\November 2015 GW Sampling\GW Summary Report\2016_0223_Figure 3 Charts.xlsx

APPENDIX A

Field Forms and Inspection Records

Static Water Levels

Location (Site/Facility Name): Ameripride
Location (Address): 822 Seneca St
Client:

Date: 5/5/15
Performed By: S Burke, R Drayn
Job Number: 37319-054

Well ID	Riser Elevation* (NAVD 1988)	Water Level (from Top of Riser)	Well Condition/Notes	Repairs Needed?
MW-101	585.22	5.05	well lid bolts missing	Yes
MW-102R	585.3	7.67	Lock Rusted	New lock needed
MW-103	586.36	6.15	None	No
MW-104	585.13	10.38 (from top of protective casing)	Top PVC riser unseated from riser below WL reading from top of protective casing	Yes, top PVC riser unseated
MW-105	584.68	9.27	None	NO
MW-106	584.11	5.79	No J-plug	New J-Plug Needed
MW-301	582.14	7.20	No J-plug	New J-Plug Needed
MW-302	581.35	-	Unable to locate, possibly destroyed	well likely destroyed
MW-303	581.79	6.66	None	No

* - Riser elevations were surveyed in 2014

Static Water Levels

Location (Site/Facility Name): Ameripride
Location (Address): 822 Seneca St
Client: Ameripride Services

Date: 11/23/15
Performed By: SBB / DRK
Job Number: 37319-054

Well ID	Riser Elevation* (NAVD 1988)	Water Level (from Top of Riser)	Well Condition/Notes	Repairs Needed?
MW-101	585.22	4.80	Needs new bolts, casing flooded (needs new road box	Y
MW-102R	585.3	7.61	Needs New Lock	Y
MW-103	586.36	8.43	OK	N
MW-104	585.13	10.48	Riser unseated. All measurements taken from top of outer casing	Y
MW-105	584.68	8.86	Needs New Lock	Y
MW-106	584.11	6.06	Installed new J-plug. Needs New Lock	Y
MW-301	582.14	7.39	Installed New J-Plug otherwise okay.	N
MW-302	581.35		Well Not Found	
MW-303	581.79	6.54	OK	N

* - Riser elevations were surveyed in 2014

GROUNDWATER SAMPLING RECORD

PROJECT	AmeriPride	H&A FILE NO.	37319-054
LOCATION	Buffalo, NY	PROJECT MGR.	C. Mandello
CLIENT	AmeriPride Services	FIELD REP	BDD/SBB
CONTRACTOR	/	DATE	5/5/2015

GROUNDWATER SAMPLING INFORMATION

Well No.	MW-303	MW-301	MW-101	MW-102R	MW-105	MW-106
Water Depth (ft) BGS	7.36'	7.60'	~~8.30~~ 5.35	5.37'	6.71'	3.89'
Time	0925	0920	0910	0845	0850	0855
Product	None	None	None	None	None	None
Depth Of Well (ft) BGS	15.8'	19.2'	18.2	17.0'	15.6'	19.2'
Inside Diameter (in)	2"	2"	2"	2"	2"	2"
Standing Water Depth (ft) (1)	8.44'	10.60'	12.85	11.63'	8.89'	15.31'
Volume Of Water In Well (gal)	1.35'	1.70'	2.06	1.86'	1.42'	2.45'
Purging Device	Bailer	Bailer	Bailer	Bailer	Bailer	Bailer
Volume of Bailer/Pump Capacity						
Cleaning Procedure	N/A	N/A	N/A	N/A	N/A	N/A
Bails Removed/ Volume Removed	4.05'	5.10'	6.18	5.58'	4.26'	7.35'
Time Purging Started	0955	1012	1050	1120	1150	1210
Time Purging Stopped	1000	1019	1100	1135	1200	1220
Sampling Device	Bailer	Bailer	Bailer	Bailer	Bailer	Bailer
Cleaning Procedure	N/A	N/A	N/A	N/A	N/A	N/A
TIME SAMPLES TAKEN: VOCs	X	X	X	X	X	X
PARAMETERS: Color						
Odor						
pH						
Conductivity						
Turbidity						
Dissolved Oxygen						
Temp, °C						
Salinity						

Remarks: (ie: field filtrations, persons communicated with at site, etc.)

1. Standing Water Depth Depth of Well - Water Depth
2. Wells purged, then sampled with dedicated bailers.
3. Depth of water and well reference ground surface.

GROUNDWATER SAMPLING RECORD

PROJECT	AmeriPride	H&A FILE NO.	37319-054
LOCATION	Buffalo, NY	PROJECT MGR.	C. Mandle.
CLIENT	AmeriPride Services	FIELD REP	BDD/SBR
CONTRACTOR	✓	DATE	5/5/2015

GROUNDWATER SAMPLING INFORMATION

Well No.	MW-103	MW-104					
Water Depth (ft) BGS	6.00'	7.68'					
Time	0903	0858					
Product							
Depth Of Well (ft) BGS	19.6'	16.3'					
Inside Diameter (in)	2"	2"					
Standing Water Depth (ft) (1)	13.60'	8.62'					
Volume Of Water In Well (gal)	2.18'	1.38'					
Purging Device	Bailer	Bailer					
Volume of Bailer/Pump Capacity							
Cleaning Procedure	N/A	N/A					
Bails Removed/ Volume Removed	6.54'	4.14'					
Time Purging Started	1250	1315					
Time Purging Stopped	1305	1330					
Sampling Device	Bailer	Bailer					
Cleaning Procedure							
TIME SAMPLES TAKEN: VOCs	X	X					
PARAMETERS: Color							
Odor							
pH							
Conductivity							
Turbidity							
Dissolved Oxygen							
Temp C							
Salinity							

Remarks: (ie field filtrations persons communicated with at site etc)

1 Standing Water Depth = Depth of Well - Water Depth

Form 3005

GROUNDWATER SAMPLING RECORD

PROJECT	Ameripride	H&A FILE NO.	37319-054
LOCATION	Buffalo, NY	PROJECT MGR.	C. Modello
CLIENT	Ameripride Services	FIELD REP	SRB/DBK
CONTRACTOR	—	DATE	11/23/15

GROUNDWATER SAMPLING INFORMATION

Well No	MW-102R	MW-105	MW-106	MW-104	MW-301	MW-303
Water Depth (ft)	7.61	8.86	6.06	10.48	7.39	6.84
Time	0848	0850	0851	0852	0855	0859
Product	No	No	No	No	No	No
Depth Of Well (ft)	19.96	18.35	17.51	19.31	18.75	16.39
Inside Diameter (in)	2"	2"	2"	2"	2"	2"
Standing Water Depth (ft)	12.35	9.49	11.45	8.83	11.36	9.55
Volume Of Water In Well (gal)	2.0	1.5	1.8	1.4	1.8	1.6
Purging Device	Bailer	Bailer	Bailer	Bailer	Bailer	Bailer
Volume of Bailer Pump Capacity	N/A	N/A	N/A	N/A	N/A	N/A
Cleaning Procedure	N/A	N/A	N/A	N/A	N/A	N/A
Bails Removed Volume Removed	6.0	4.5	5.4	4.2	5.4	4.8
Time Purging Started	0920	1025	1050	1120	1230	1210
Time Purging Stopped	0950	1050	1115	1150	1250	1245
Sampling Device	Bailer	Bailer	Bailer	Bailer	Bailer	Bailer
Cleaning Procedure						
TIME SAMPLES TAKEN — VOCs	0950	1050	1115	1150	1250	1245
	+ MS/MSD		+ Dup			
PARAMETERS — Color						
Odor						
pH						
Conductivity						
Turbidity						
Dissolved Oxygen						
Temp. C						
Salinity						

Remarks (ie field filtrations persons communicated with at site etc)

1 Standing Water Depth = Depth of Well - Water Depth

Form 3005

GROUNDWATER SAMPLING RECORD

PROJECT	Ameripride	H&A FILE NO.	37319-054
LOCATION	Buffalo, NY	PROJECT MGR.	C. Mondello
CLIENT	Ameripride Services	FIELD REP	SBB / DBK
CONTRACTOR	—	DATE	11/23/15

GROUNDWATER SAMPLING INFORMATION

Well No		MW-101	MW-103				
Water Depth (ft		4.80	8.43				
Time		0902	0905				
Product		No	No				
Depth Of Well (ft)		18.00	19.58				
Inside Diameter (in)		2"	2"				
Standing Water Depth (ft)		13.2	11.15				
Volume Of Water In Well (gal)		2.1	1.8				
Purging Device		Bailer	Bailer				
Volume of Bailer Pump Capacity		N/A	N/A				
Cleaning Procedure		N/A	N/A				
Bails Removed Volume Removed		6.3	5.4				
Time Purging Started		1130	1105				
Time Purging Stopped		1155	1125				
Sampling Device		Bailer	Bailer				
Cleaning Procedure							
TIME SAMPLES TAKEN	VOCs	1155	1125				
PARAMETERS	Color						
	Odor						
	pH						
	Conductivity						
	Turbidity						
	Dissolved Oxygen						
	Temp °C						
	Salinity						

Remarks (ie field filtrations persons communicated with at site etc)

1 Standing Water Depth = Depth of Well - Water Depth

APPENDIX B

Data Usability Summary Report

Data Usability Summary Report (DUSR)
Ameripride GW Monitoring
Analytical Laboratory: Alpha Analytical - Westborough, MA
Sample Delivery Group # L1509534

Analytical results for the project samples were reviewed to evaluate the data usability. Data was assessed in accordance with guidance from the following Federal and/or State guidance documents:

- USEPA National Functional Guidelines for Organic Data Review (EPA 540-R-08-01) and/or
  USEPA National Functional Guidelines for Low Concentration Organic Data Review (EPA 540-R-00-006)
- NYSDEC "Guidance for the Development of Quality Assurance Plans and
  Data Usability Summary Reports (DUSR)", September 1997

and method protocol criteria where applicable as prescribed by "Test Methods for Evaluating Solid Waste", SW846, Update III, 1996, or Standard Methods for the Examination of Water and Wastewater, Eds 18-20.

This DUSR pertains to the following samples:

Sample ID
MW-303-20150505-1000
MW-301-20150505-1025
MW-101-20150505-1100
MW-102R-20150505-1135
MW-105-20150505-1200
MW-106-20150505-1220
MW-103-20150505-1305
3179-20150505-0001
MW-104-20150505-1330
3179-20150505-0002

Project Samples were analyzed according to the following analytical methods:

	Parameter	Analytical Method	Holding Time Criteria
1.	VOCs	EPA 8260B	14 days

The following items/criteria applicable to the analysis of project samples and associated QA/QC procedures were reviewed.

- Holding Times
- Project-specific Reporting Limits
- Blank Sample Analysis
- System Monitoring Compound Recoveries
- Laboratory Control Samples, Matrix Spike/Matrix Spike Duplicate Recoveries
- Sample Data Reporting Format
- Data Qualifiers
- Summary

Preservation and Holding Times

Maximum allowable holding times, measured from the time of sample collection to the time of sample preparation or analysis, were met for each project sample analyzed as part of this sample delivery group. No qualification of the data is recommended.

Project-specific Reporting Limits

The reporting limits for the samples within this Sample Delivery Group (SDG) met or exceeded the minimum reporting limit requirements specified by the Project-specific Quality Assurance Project Plan (QAPP). No qualification of the data is recommended.

Blank Sample Analysis

In accordance with cited USEPA guidelines, positive sample results should be reported unless the concentration of the compound in the project sample is less than or equal to 10 times (10X) the amount in any blank for metals and the common organic laboratory contaminants (methylene chloride, acetone, 2-butanone, cyclohexane, and phthalate esters), or 5 times (5X) the amount for other target compounds. Target analytes were not detected in associated blank samples (trip, equipment, method) prepared and analyzed concurrently with the project samples. No qualification of the data is recommended.

System Monitoring Compound Recoveries

System monitoring/surrogate compounds are added to each sample prior to analysis of organic parameters to confirm the efficiency of the sample preparation procedure. The calculated recovery for each surrogate compound was evaluated to confirm the accuracy of the reported results. The calculated recovery of these compounds fell within the laboratory specific quality control criteria. No qualification of the data is recommended.

Laboratory Control Samples, Matrix Spike/Matrix Spike Duplicate Recoveries

Analytical precision and accuracy was evaluated based on the laboratory control and matrix spike sample analyses performed concurrently with the project samples. For matrix spike samples, after the addition of a known amount of each target analyte to the sample matrix, the sample was analyzed to confirm the ability to identify these compounds within the sample matrix. For LCS analyses, after the addition of a known amount of each target analyte into laboratory reagent water, the sample was analyzed to confirm the ability of the analytical system to accurately quantify the compounds. The reported recovery of MS/MSD and LCS analyses fell within the laboratory QA acceptance criteria. No qualification of the data is recommended.

Sample Data Reporting Format

The sample data are presented using USEPA Contract Laboratory Protocol (CLP) format or equivalent. The data package has been reviewed for completeness and found to contain each required sample result and associated QA/QC report form. The reporting format is complete and compliant with the objectives of the project. No qualification of the data is recommended.

Data Qualifiers

Samples that contain results between the MDL and RL were flagged as estimated, "J", by the laboratory. The data user should be aware that there is a possibility of false positive or mis-identification at the quantitation levels. The laboratory also qualified results when target analytes were detected in the associated method/preparation blank sample. Based on a spot check of the data qualifiers used, these flags appeared to be applied to the reported results in accordance with EPA guidance.

Summary

The results presented in each report were found to be compliant with the data quality objectives for the project and usable. Based on our review, the usability of the data is 100%, with the few exceptions noted above.

Data Usability Summary Report (DUSR)
AMERIPRIDE
Analytical Laboratory: Alpha Analytical - Westborough, MA
Sample Delivery Group # L1530827

Analytical results for the project samples were reviewed to evaluate the data usability. Data was assessed in accordance with guidance from the following Federal and/or State guidance documents:

- USEPA National Functional Guidelines for Organic Data Review (EPA 540-R-08-01) and/or
  USEPA National Functional Guidelines for Low Concentration Organic Data Review (EPA 540-R-00-006)
- NYSDEC "Guidance for the Development of Quality Assurance Plans and
  Data Usability Summary Reports (DUSR)". September 1997

and method protocol criteria where applicable as prescribed by "Test Methods for Evaluating Solid Waste", SW846, Update III, 1996, or Standard Methods for the Examination of Water and Wastewater, Eds 18-20.

This DUSR pertains to the following samples:

Sample ID
MW102R-151123-0950
MW105-151123-1050
MW106-151123-1115
MW104-151123-1150
MW301-151123-1250
MW303-151123-1245
MW101-151123-1155
MW103-151123-1125
3188-151123-0001
Trip Blank

Project Samples were analyzed according to the following analytical methods:

	Parameter	Analytical Method	Holding Time Criteria
1.	VOCs	EPA 8260B	14 days

The following items/criteria applicable to the analysis of project samples and associated QA/QC procedures were reviewed.

- Holding Times
- Project-specific Reporting Limits
- Blank Sample Analysis
- System Monitoring Compound Recoveries
- Laboratory Control Samples, Matrix Spike/Matrix Spike Duplicate Recoveries
- Sample Data Reporting Format
- Data Qualifiers
- Summary

Preservation and Holding Times

Maximum allowable holding times, measured from the time of sample collection to the time of sample preparation or analysis, were met for each project sample analyzed as part of this sample delivery group. No qualification of the data is recommended.

Project-specific Reporting Limits

The reporting limits for the samples within this Sample Delivery Group (SDG) met or exceeded the minimum reporting limit requirements specified by the Project-specific Quality Assurance Project Plan (QAPP). No qualification of the data is recommended.

Blank Sample Analysis

In accordance with cited USEPA guidelines, positive sample results should be reported unless the concentration of the compound in the project sample is less than or equal to 10 times (10X) the amount in any blank for metals and the common organic laboratory contaminants (methylene chloride, acetone, 2-butanone, cyclohexane, and phthalate esters), or 5 times (5X) the amount for other target compounds. Target analytes were not detected in associated blank samples (trip, equipment, method) prepared and analyzed concurrently with the project samples. No qualification of the data is recommended.

System Monitoring Compound Recoveries

System monitoring/surrogate compounds are added to each sample prior to analysis of organic parameters to confirm the efficiency of the sample preparation procedure. The calculated recovery for each surrogate compound was evaluated to confirm the accuracy of the reported results. The calculated recovery of these compounds fell within the laboratory specific quality control criteria. No qualification of the data is recommended.

Laboratory Control Samples, Matrix Spike/Matrix Spike Duplicate Recoveries

Analytical precision and accuracy was evaluated based on the laboratory control and matrix spike sample analyses performed concurrently with the project samples. For matrix spike samples, after the addition of a known amount of each target analyte to the sample matrix, the sample was analyzed to confirm the ability to identify these compounds within the sample matrix. For LCS analyses, after the addition of a known amount of each target analyte into laboratory reagent water, the sample was analyzed to confirm the ability of the analytical system to accurately quantify the compounds. The reported recovery of MS/MSD and LCS analyses fell within the laboratory QA acceptance criteria. No qualification of the data is recommended.

Sample Data Reporting Format

The sample data are presented using USEPA Contract Laboratory Protocol (CLP) format or equivalent. The data package has been reviewed for completeness and found to contain each required sample result and associated QA/QC report form. The reporting format is complete and compliant with the objectives of the project. No qualification of the data is recommended.

Data Qualifiers

Samples that contain results between the MDL and RL were flagged as estimated, "J", by the laboratory. The data user should be aware that there is a possibility of false positive or mis-identification at the quantitation levels. The laboratory also qualified results when target analytes were detected in the associated method preparation blank sample. Based on a spot check of the data qualifiers used, these flags appeared to be applied to the reported results in accordance with EPA guidance.

Summary

The results presented in each report were found to be compliant with the data quality objectives for the project and usable. Based on our review, the usability of the data is 100%, with the few exceptions noted above.

APPENDIX C

Waste Disposal Documentation

NON-HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12 pitch) typewriter)

NON-HAZARDOUS WASTE

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N/A

Manifest Document No. 00001

2. Page 1 of 1

3. Generator's Name and Mailing Address
AmeriPride Services, Inc.
850 Industrial Boulevard, NE, Minneapolis, MN 55413
612-676-8060 Attn: Randy Cook

822 Seneca Street
Buffalo NY

4. Generator's Phone ( )

5. Transporter 1 Company Name
OP-TECH Environmental Svcs, Inc.

6. US EPA ID Number
N Y D 9 8 8 9 3 0 7 5 3

A. State Transporter's ID 28845 JS NY
B. Transporter 1 Phone 716-325-1802

7. Transporter 2 Company Name

8. US EPA ID Number

C. State Transporter's ID

D. Transporter 2 Phone

9. Designated Facility Name and Site Address
Covanta Niagara
100 Energy Blvd @56th Street
Niagara Falls, NY 14304

10. US EPA ID Number
N Y D 9 8 8 9 3 0 5 4 3

E. State Facility's ID

F. Facility's Phone
716-278-8500

11. WASTE DESCRIPTION	Containers No.	Containers Type	13. Total Quantity	14. Unit Wt./Vol.
a. NON DOT Regulated Liquids,NOS(Contaminated Water)	1	DM	55	G
b.				
c.				
d.				

GENERATOR

G. Additional Descriptions for Materials Listed Above
a. Job # HAA0008
b.
c.
d.

H. Handling Codes for Wastes Listed Above
a. B
b.
c.
d.

15. Special Handling Instructions and Additional Information
In Case of Emergency call 1-800-225-6750. This material has been verified as approval # 7603 NYSDEC 08-010.

16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name: Agent/Linda Scott
Signature: Linda Scott
Date: Month 7 Day 21 Year 15

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Ed BurBee
Signature: Ed BurBee
Date: Month 7 Day 21 Year 15

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of the waste materials covered by this manifest, except as noted in item 19
Printed/Typed Name: Kathy Steele
Signature: Kathy Steele
Date: Month 7 Day 30 Year 15

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau A
625 Broadway, 12th Floor, Albany, NY 12233-7015
P: (518) 402-9625 | F: (518) 402-9627
www.dec.ny.gov

January 20, 2016

Sent via e-mail, no hard copy to follow

Ms. Claire L. Mondello
Project Manager
Haley & Aldrich
200 Town Centre Drive, Suite 2
Rochester, New York 14623-4264

Re: 24th Contained-In Determination Request
Former American Linen Supply Company Facility (BCP #C915241)

Dear Ms. Mondello:

We have completed our review of the water sampling data (Lab report ID L1530827) submitted with your January 19, 2016 request, via e-mail, for a "contained-in" determination for the referenced project. Concentrations detected for individual VOCs were all significantly less than their current "contained-in" groundwater action levels, and Land Disposal Restriction (LDR) concentrations.

Water (purge water , well sampling and decon water) collecting during the sampling of monitoring wells met "contained-in" groundwater action levels and Land Disposal Restriction concentrations. Concentrations for cis-1,2-dichloroethene, trichloroethene, tetrachloroethene and vinyl chloride were below their "contained-in" groundwater action levels and Land Disposal Restriction concentrations. Therefore one (1) 55-gallon drums, containing water generated from sampling of monitoring wells at the referenced project do not have to be managed as hazardous waste and can be transported off-site, by Op-Tech, to Covanta Niagara in Niagara Falls, New York, for disposal.

Should you have any questions regarding the content of this letter, please do not hesitate to contact me at (518) 402-9622 or email me at henry.wilkie@dec.ny.gov.

Sincerely,

Henry Wilkie
Environmental Engineer 1
Remedial Section B

ecc: J. Walia, Region 9

NON-HAZARDOUS WASTE MANIFEST

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible]

Manifest Document No. [illegible]

2. Page 1 of [illegible]

3. Generator's Name and Mailing Address
[illegible]
250 Industrial Boulevard, NE, Minneapolis, MN [illegible]

4. Generator's Phone ( ) [illegible]

5. Transporter 1 Company Name
UP TECH Environmental [illegible]

6. US EPA ID Number [illegible]

A. State Transporter's ID

B. Transporter 1 Phone

7. Transporter 2 Company Name

8. US EPA ID Number

C. State Transporter's ID

D. Transporter 2 Phone

9. Designated Facility Name and Site Address
[illegible]

10. US EPA ID Number [illegible]

E. State Facility's ID

F. Facility's Phone [illegible]

11. WASTE DESCRIPTION	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.
a. NON DOT Regulated Liquids [illegible]	[illegible]	[illegible]	[illegible]	[illegible]
b.				
c.				
d.				

G. Additional Descriptions for Materials Listed Above
a. [illegible]

H. Handling Codes for Wastes Listed Above
[illegible]

15. Special Handling Instructions and Additional Information
[illegible]

GENERATOR

16. **GENERATOR'S CERTIFICATION**: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name | Signature | Date: Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of the waste materials covered by this manifest, except as noted in Item 19.

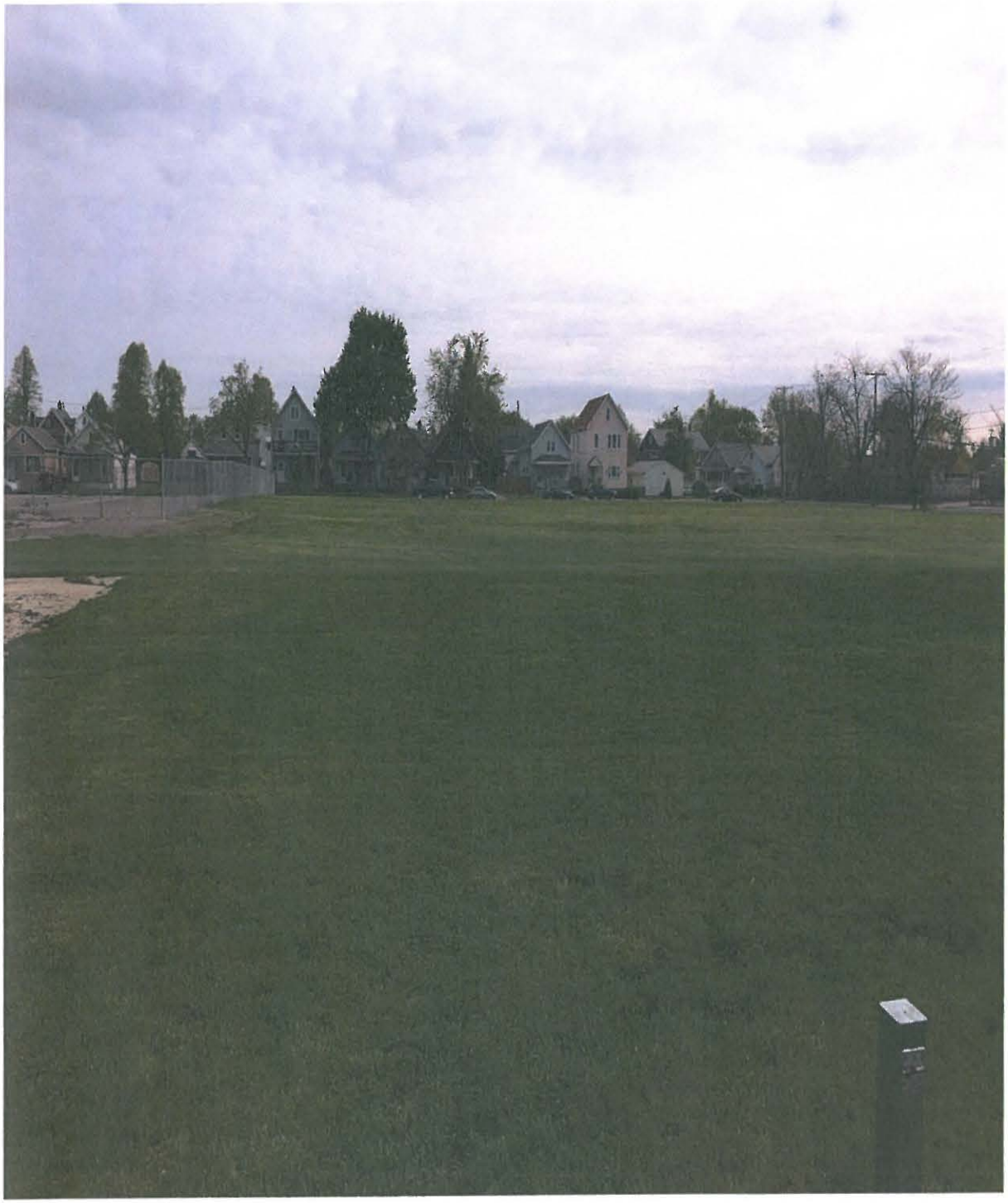
Printed/Typed Name | Signature | Date: Month Day Year

NON-HAZARDOUS WASTE

Appendix D

NEU-VELLE LLC

Photographs



Appendix E

NEU-VELLE LLC

P.E. Certification

PROFESSIONAL ENGINEER CERTIFICATION

PERIODIC REVIEW REPORT (PRR)

FORMER AMERICAN LINEN SUPPLY COMPANY FACILITY
822 SENECA STREET, BUFFALO, NEW YORK 14210

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Albert G. Lyons, Jr., P.E.

5/18/16
Date