Periodic Review Report

Fmr. American Linen Supply Company Site

BCP Site No. C915241
822 Seneca Street

April 2017 0126-017-003

Prepared For:

Mill Race Commons, LLC

Prepared By:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

2558 Hamburg Turnpike, Suite 300, Buffalo, NY | phone: (716) 856-0599 | fax: (716) 856-0583

PERIODIC REVIEW REPORT
for the
FORMER AMERICAN LINEN SUPPLY COMPANY FACILITY
(SITE NO. C915241)

822 SENECA STREET
BUFFALO, NEW YORK

April 2017 B0126-017-003

Prepared for:

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

Prepared By:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Benchmark Environmental Engineering & Science, PLLC
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PERIODIC REVIEW REPORT

Former American Linen Supply Company Facility

BCP Site No. C915241

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PERIODIC REVIEW REPORT

Former American Linen Supply Company Facility

BCP Site No. C915241

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1.0 INTRODUCTION

Benchmark Environmental Engineering and Science, PLLC (Benchmark) has prepared this Periodic Review Report (PRR) on behalf of Mill Race Commons, LLC to summarize the post-remedial status of New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) Site No. C915241, located in the City of Buffalo, Erie County, New York (see Figure 1).

This PRR has been prepared in accordance with the NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation (Ref. 1) and the NYSDEC's Institutional and Engineering Controls (IC/EC) Certification Forms have been prepared for Former American Linen Supply Company Facility (hereinafter referred to as the "Site").

This PRR and the associated IC/EC Form (see Appendix A) have been completed for the March 24, 2016 to March 24, 2017 reporting period.

1.1 Site Background

The Site is located at 822 Seneca Street in the City of Buffalo, Erie County, New York and is identified as Section 122.27, Block 1, and Lot 4 on the City of Buffalo Tax Map. The Site is comprised of one (1) parcel, totaling approximately 2.9 acres in the City of Buffalo, Erie County, New York (see Figure 2). The Site is bordered by Seymour Street and residential properties to the north, Seneca Street and a vacant former industrial property to the south, Lord Street and commercial/industrial properties to the east, and vacant commercial and residential properties to the west (see Figure 2).

Based on previous reports provided to Benchmark, the Site was improved with a two-story industrial building utilized as a book binding and printing facility from 1910 to 1978. In 1978, AmeriPride purchased the Site and utilized the first floor and portions of the basement of the existing building as a uniform dry cleaning and industrial laundry facility, formerly known as the American Linen Supply Company. Previous reports indicate that tetrachloroethylene (PCE) was used as part of the drying cleaning process between 1978 and 1985. The second floor of the building and portions of the basement were utilized by Thorner Sydney Press until 1997.

After dry cleaning and laundry operations ceased in 2004, a temporary vehicle maintenance shop utilized the Site until July 2005. The Site has been vacant since late July

2005, and the vacant industrial building was demolished by AmeriPride between 2011 and 2012. In January 2014, Mill Race Commons, LLC purchased the vacant Site.

1.2 Compliance

There were no compliance issues identified during the current reporting period of this PRR regarding the major elements of the Site Management Plan (SMP), the Institutional/Engineering Control (IC/EC) Plan, the Monitoring Plan, and the Operation & Maintenance (O&M) Plan for the Site.

2.0 SITE OVERVIEW

On May 17, 2011, AmeriPride Services Inc. (AmeriPride) entered into a Brownfield Cleanup Agreement (BCA) with the NYSDEC to investigate and remediate the contaminated Site. The Site was investigated and remediated under the NYSDEC BCP and in accordance with the approved May 2011 Remedial Investigation Work Plan (RIWP) and the approved May 2014 Alternatives Analysis Report and Remedial Action Work Plan (AAR/RAWP) (Refs. 2 & 3). The Site received a Certificate of Completion (COC) from the NYSDEC in December 2014.

2.1 Existing Conditions

During the Site visit on April 3, 2017, the Site vegetated soil and asphalt cover system was inspected and observed. No evidence of erosion or breaches were observed on the soil covered areas, and a good stand of vegetation was present across the cover. Although the asphalt cover was adequate, it appeared to be showing signs of weathering. Future site inspections will continue to monitor the integrity of the asphalt cover.

2.2 Remedial Program Chronology

A Phase I Environmental Site Assessment (ESA), Initial Phase II Subsurface Investigation, Supplemental Phase II, and site-wide groundwater monitoring were completed between 2004 and 2009, prior to entry into the BCP in 2011. Findings of the previous investigations were used to support the approved May 2011 RIWP.

2.2.1 Remedial Investigation

From November 2011 through December 2012, a Remedial Investigation (RI) was performed to characterize the nature and extent of soil, groundwater, and soil vapor contamination at the Site. Remedial investigation locations activities included:

- Soil Investigation – borings, test pits, and surface samples collected from the former parking lot area near the former underground storage tanks, basement sub-slab soil, and beneath slab-on-grade in the former dry-cleaning operation area.
- Groundwater Investigation – groundwater samples were collected from discrete locations and from permanent monitoring wells located both on and off-site.

- Soil Vapor Investigation – Soil vapor samples were collected from four locations across the Site.

RI sample locations are shown on Figure 2.

Environmental investigations of the Site identified the presence of 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 (VC) in soil and groundwater, polycyclic aromatic hydrocarbons (PAHs) and heavy metals including arsenic, copper, lead and mercury in historic fill, and petroleum-related VOCs in soil vapor that required remediation. The SMP identifies the five cVOCs as "Target cVOCs," the presence of which, is consistent with the former dry-cleaning operations at the Site.

2.2.2 Remedial Action

Remedial activities were reportedly performed across the Site from 2012 through 2014, in accordance with the approved August 2014 Revised Alternatives Analysis Report and Remedial Action Work Plan (Ref. 3). The Interim Remedial Measures and Remedial Actions included:

- Excavation and off-site disposal of cVOC impacted soil/fill exceeding Commercial/Industrial SCOs in the former dry cleaning area and impacted "oily" material in the southwest corner of the basement beneath the floor slab.
- Removal of former industrial Site features including basement cisterns, underground storage tanks (USTs), and a sewer vault.
- Construction and maintenance of a soil cover system consisting of at least one-foot of NYSDEC-approved clean cover material over a demarcation layer, in accordance with 6NYCRR Part 375 and NYSDEC DER-10 guidelines.
- Execution and recording of an Environmental Easement (EE) to restrict land use and prevent future exposure to any contamination remaining at the Site.
- Development and implementation of a Site Management Plan (SMP) for long-term management of remaining contamination as required by the EE, which includes: (1) Institutional and Engineering Controls, (2) monitoring, (3) operation and maintenance and (4) reporting.

- Periodic certification of the institutional and engineering controls listed above.

After completion of remedial activities, remaining contamination was identified in the subsurface at the Site. Therefore, an SMP (Ref. 4), was prepared on behalf of AmeriPride, in accordance with NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation (Ref. 1). Periodic groundwater monitoring is a requirement of the SMP.

3.0 SITE MANAGEMENT PLAN

An SMP was prepared for the Site and approved by the Department in October 2014 (Ref. 4). The SMP includes Institutional and Engineering Control (IC/EC) Requirements, Monitoring Plan, and Operation and Maintenance (OM&M) Plan. A brief description of the SMP components are presented below.

3.1 IC/EC Compliance

Because remaining contaminated soil/fill and groundwater exists at the Site, Institutional Controls and Engineering Controls (IC/ECs) are required to protect human health and the environment.

3.1.1 Institutional Controls (ICs) Requirements

The Site is subject to the following ICs:

- Compliance with the EE;
- The controlled property may only be used for commercial and/or industrial use as defined by the NYSDEC;
- All ECs must be operated and maintained as specified in the SMP;
- All ECs on the Controlled Property must be inspected at a frequency and in a manner defined in the SMP;
- 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 the SMP;
- Data and information pertinent to Site Management and the Controlled Property must be reported at the frequency and in a manner defined in the SMP;
- All future activities on the property that will disturb the 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; and

- Access to the Site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the EE.

ICs identified in the EE may not be discontinued without an amendment to or extinguishment of the EE.

3.1.2 Engineering Controls (ECs) Requirements

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

- 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 locations if 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.

3.1.3 Site Inspection & IC/EC Compliance

On April 3, 2017, Benchmark's Certifying Professional Engineer performed a Site visit and assessment. During this visit, the Site covered by this PRR was fully compliant with the IC/EC requirements. Appendix A includes the completed and PE-certified IC/EC Form for the Site. Appendix B includes a photographic log of the Site at the time of the inspection.

3.2 Monitoring Plan Compliance

The Monitoring Plan presented in the SMP describes the measures for evaluating the performance and effectiveness of the remedy to reduce or mitigate contamination at the Site, the soil cover system, and all affected site media presented below. Periodic monitoring of the remedy and overall reduction of on-site contamination will be conducted for 5 years post-COC, which occurred in December 2014. The Monitoring Plan consists of three (3) major components, including cover system monitoring, groundwater monitoring, and sub-slab vapor and indoor air monitoring. Monitoring programs are summarized in Table 1 below and described in the following Sections.

Table 1: Monitoring/Inspection Schedule

Monitoring Program	Frequency*	Matrix	Analysis
Cover System	Annual Inspection	N/A	Visual only
Groundwater	Semi-annual for 2 years; annual thereafter	Groundwater	Target cVOCs (PCE, TCE, cis-1,2-DCE, VC)
Soil Vapor/Indoor Air	If two (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 residence and will be discussed with the NYSDEC and NYSDOH	Soil Vapor & Indoor Air	Target cVOCs (PCE, TCE, cis-1,2-DCE, VC)

* The frequency of events will be conducted as specified in the SMP until otherwise approved by NYSDEC and NYSDOH.

3.2.1 Cover System Monitoring

In accordance with the SMP, the cover system must be maintained at all times, and must be replaced in the event it is breached as described in the Excavation Work Plan in Appendix B of the SMP (Ref. 4). The cover will be inspected on an annual basis. If frequent areas of distress are noted, they will be repaired based on the following conditions.

- Asphalt Cover Monitoring – A brief summary of the key maintenance concerns and the respective corrective actions is provided below:
  - *Half-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.*

- Vegetative Soil Cover Monitoring – A brief summary of the key maintenance concerns and the respective corrective actions is provided below:
  - *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.*

Based on the Site reconnaissance performed on April 3, 2017, the asphalt and vegetative soil cover system at the Site was compliant with the IC/EC requirements, however signs of surface weathering on the asphalt cover are evident.

3.2.2 Groundwater Monitoring

Groundwater monitoring will be performed on a semi-annual basis for a period of two years post-COC, after which the monitoring frequency may be reduced to annually with approval from the NYSDEC based on monitoring results. The SMP requires that groundwater sampled from all nine (9) wells be analyzed for Target cVOCs including PCE, TCE, cis-1,2-DCE, and VC. The network of monitoring wells has been installed to monitor both up-gradient and down-gradient groundwater conditions at the Site. Repairs and/or replacement of wells in the monitoring well network will be performed based on assessments of structural integrity and overall performance. The monitoring well network is summarized in Table 2 below.

Table 2: Monitoring Well Network Summary

Well ID	Location	Casing Diameter	Screen Depth (fbgs)	Analytes Tested
MW-101	On-Site	2 inch	13.2-18.2	Target cVOCs
MW-102R	On-Site	2 inch	12.0-17.0	
MW-103	On-Site	2 inch	10.9-15.9	
MW-104	On-Site	2 inch	11.3-16.3	
MW-105	On-Site	2 inch	10.6-15.6	
MW-106	On-Site	2 inch	9.6-14.6	
MW-301	Off-Site	2 inch	13.5-18.5	
MW-302	Off-Site	2 inch	12.8-17.5	
MW-303	Off-Site	2 inch	11.1-15.8	

Two semi-annual groundwater monitoring events were performed during the current reporting period: May 13 and November 21, 2016, the results of which are presented in Appendix C. Groundwater monitoring data from the 2016 events as well as prior events are summarized in the 2016 Groundwater Monitoring Summary Report (see Appendix C). Groundwater results were compared to NYSDEC Class GA groundwater quality standards (GWQS) per NYSDEC Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1.

As reported, "[t]he 2016 results indicate stable or decreased concentrations as compared to pre-remediation results. The results in MW-105 may reflect slight seasonal fluctuations, however the concentrations of cVOCs in that well have appeared to remain consistent since 2013. 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 compared to pre-remediation concentrations in MW-102R, therefore additional indoor air sampling at the 798 Seneca Street residence does not appear to be warranted at this time."

The 2016 groundwater monitoring events complete the SMP required 2 years Post-COC monitoring requirement. The next monitoring event is tentatively scheduled for Spring/Summer 2017.

3.2.3 Soil Vapor/Air Monitoring

In response to the RI soil vapor results, additional sub-slab vapor, indoor air, and outdoor air samples were collected off-site, in the basement of 798 Seneca Street, adjacent to the Site in December 2013. Low concentrations of PCE in the sub-slab vapor, indoor air, and outdoor air and low concentrations of TCE in sub-slab vapor and outdoor air were identified. However, detections were well below the NYSDOH October 2006 Soil Vapor Intrusion Guidance thresholds (Ref. 5). When compared against Matrix 1 and Matrix 2 of the NYSDOH Guidance, no further action was recommended or required.

If results of future groundwater monitoring indicate an increasing trend of Target cVOCs in well 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 per discussion with the NYSDEC and NYSDOH.

Based on the 2016 groundwater results, Target cVOCs remain below laboratory detection limits or have decreased substantially compared to pre-remediation concentrations in well MW-102R, therefore additional indoor air sampling at the 798 Seneca Street residence is not warranted at this time.

3.3 O&M Compliance

The Site remedy does not rely on any mechanical systems (e.g., sub-slab depressurization systems, groundwater pump and treat, or air sparge/soil vapor extraction systems) to protect public health and the environment, therefore an Operation and Maintenance (O&M) Plan is not required for the Site.

4.0 CONCLUSIONS

Based on our April 2017 site reconnaissance and the 2016 groundwater monitoring event results performed during the current reporting period, our conclusions are as follows:

- At the time of our April 2017 site reconnaissance, the Site covered by this PRR was fully compliant with the IC/EC requirements.
- Groundwater data indicate stable or decreased concentrations as compared to pre-remediation results. Dissolved phase Target cVOCs do not appear to be migrating off site. Target cVOC concentrations at well MW-102R (adjacent to the residence at 798 Seneca Street) remain below laboratory detection limits or have decreased substantially compared to pre-remediation concentrations, therefore additional indoor air sampling at the 798 Seneca Street residence is not warranted at this time.

5.0 DECLARATION/LIMITATION

This report has been prepared for the exclusive use of Mill Race Commons, LLC. The contents of this report are limited to information available at the time of the site inspection. Data provided by others as referenced herein is assumed to be accurate and reliable. The findings herein may be relied upon only at the discretion of Mill Race Commons, LLC. Use of or reliance upon this report or its findings by any other person or entity is prohibited without written permission of Benchmark Environmental Engineering and Science, PLLC.

6.0 REFERENCES

1. New York State Department of Environmental Conservation. *DER-10/Technical Guidance for Site Investigation and Remediation*. May 2010.
2. Haley & Aldrich of New York. *Report on Remedial Investigations and Interim Remedial Measure Completion for the Former American Linen Supply Company Facility, Buffalo, New York, BCP Site No. C915241*. May 2013.
3. Haley & Aldrich of New York. *Revised Alternatives Analysis Report & Remedial Action Work Plan for the Former American Linen Supply Company Facility, Buffalo, New York, BCP Site No. C915241*. May 2014.
4. Haley & Aldrich of New York. *Site Management Plan for the Former American Linen Supply Company Facility, Buffalo, New York, BCP Site No. C915241*. October 2014.
5. New York State Department of Health (NYSDOH). *Guidance for Evaluating Soil Vapor Intrusion in the State of New York*. October 2006.

FIGURES

F:\CAD\Benchmark\Kavinoky\822 Seneca Street\PRR\2017\Figure 1; Site Location & Vicinity Map.dwg

FIGURE 1

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0599

PROJECT NO.: 0126-017-003

DATE: MARCH 2017

DRAFTED BY: CCB

SITE LOCATION & VICINITY MAP

PERIODIC REVIEW REPORT

FORMER AMERICAN LINEN SUPPLY COMPANY FACILITY
(SITE NO. C915241)
BUFFALO, NEW YORK

PREPARED FOR

MILL RACE COMMONS, LLC

F:\CAD\Benchmark\Kavinoky\822 Seneca Street\PRR\2017\Figure 2; Site Plan.dwg

SEYMOUR ST

(60' WIDE)

(50' WIDE)

TP-3
TP-4
TP-7
TP-6
MW-1
(NOT FOUND)
FMR. 1,000 GAL
ALCOHOL UST
(REMOVED)
TP-5
SV-4
FMR. 10,000 GAL
GASOLINE UST
(REMOVED)
TP-2
TP-1
MW-101
MW-2
SV-3
TP-8
FMR. 1,500 GAL
WASTE OIL UST
(CLOSED IN-PLACE)
FMR. 2 x 20,000 GAL
DIESEL USTs
(CLOSED IN-PLACE)
TP-1
SV-2
TP-12
TP-9
TP-11
SV-1
TP-10
STORM WATER
VAULT
MW-102R
MW-3
MW-105
MW-106
MW-103
MW-104
MW-301
MW-303

MILL RACE COMMONS, LLC

VACANT LOT (ASPHALT & GRASS)
822 SENECA STREET
(SBL 122.27-1-4)

798 SENECA STREET

SENECA ST

LORD ST

(50' WIDE)

N

60' 0' 60' 120'

SCALE: 1 INCH = 60 FEET
SCALE IN FEET
(approximate)

DATE: MARCH 2017
DRAFTED BY: CCB

LEGEND:

- PROPERTY BOUNDARY
- PARCEL BOUNDARY
- UTILITY - STORM SEWER
- UTILITY - STORM SEWER CATCH BASIN
- ASPHALT FINAL COVER
- SOIL FINAL COVER
- FORMER UST LOCATION
- MW-1 MONITORING WELL (BY OTHER, 2005)
- MW-101 MONITORING WELL (H&A RI, 2013)
- TP-1 TEST PIT (H&A RI, 2013)
- SV-1 SOIL VAPOR (H&A RI, 2012)

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(716) 856-0599

JOB NO.: 0126-017-003

SITE PLAN

PERIODIC REVIEW REPORT
FORMER AMERICAN LINEN SUPPLY COMPANY FACILITY
(SITE NO. C915241)
BUFFALO, NEW YORK
PREPARED FOR
MILL RACE COMMONS, LLC

FIGURE 2

APPENDIX A

SITE INSPECTION (IC/EC) 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: March 24, 2016 to March 24, 2017

	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

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?	☐	☒

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

9. Are the assumptions in the Qualitative Exposure Assessment still valid? (The Qualitative Exposure Assessment must be certified every five years)	☒	☐

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
X	☐

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
X	☐

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

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

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. 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 Gary Kriner (print name) at 822 Seneca St., Buffalo, NY 14210 (print business address)

am certifying as Owner (Owner or Remedial Party)

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

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

4/6/17
Date

IC/EC CERTIFICATIONS

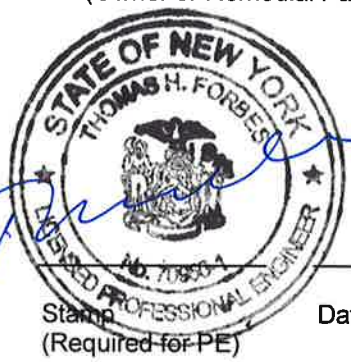
Box 7

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 Thomas Forbes (print name) at Benchmark Environmental 2558 Hamburg Tpk Buffalo, NY 14218 (print business address)

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



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

Stamp (Required for PE)

4-5-17

Date

APPENDIX B

SITE PHOTOGRAPH LOG

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

PHOTOGRAPHIC LOG

Client Name:	Site Location:	Project No.:
Mill Race Commons, LLC	822 Seneca Street, Buffalo, NY	B0126-017-003

Photo No.	Date
1	04/03/17

Direction Photo Taken:
NE

Description:
Asphalt Paved Area (from Southern end)

Photo No.	Date
2	04/03/17

Direction Photo Taken:
North

Description:
Asphalt Paved Area (from Southwest end)

Prepared By: THF

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

PHOTOGRAPHIC LOG

Client Name:	Site Location:	Project No.:
Mill Race Commons, LLC	822 Seneca Street, Buffalo, NY	B0126-017-003

Photo No.	Date
3	04/03/17

Direction Photo Taken:
NE

Description:
Asphalt Paved Area (from center)

Photo No.	Date
4	04/03/17

Direction Photo Taken:
SW

Description:
Asphalt Paved Drive (from Northern end)

Prepared By: THF

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

PHOTOGRAPHIC LOG

Client Name:	Site Location:	Project No.:
Mill Race Commons, LLC	822 Seneca Street, Buffalo, NY	B0126-017-003

Photo No.	Date
5	04/03/17

Direction Photo Taken:
SW

Description:
Asphalt Paved Area Adjacent to 798 Seneca

Photo No.	Date
6	04/03/17

Direction Photo Taken:
NE

Description:
Soil Cover (from SW end)

Prepared By: THF

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

PHOTOGRAPHIC LOG

Client Name:	Site Location:	Project No.:
Mill Race Commons, LLC	822 Seneca Street, Buffalo, NY	B0126-017-003

Photo No.	Date
7	04/03/17

Direction Photo Taken:
NE

Description:
Soil Cover (looking toward Seymour St.)

Photo No.	Date
8	04/03/17

Direction Photo Taken:
E

Description:
Soil Cover (looking toward Lord St.)

Prepared By: THF

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

PHOTOGRAPHIC LOG

Client Name:	Site Location:	Project No.:
Mill Race Commons, LLC	822 Seneca Street, Buffalo, NY	B0126-017-003

Photo No.	Date
9	04/03/17

Direction Photo Taken:
S

Description:
Soil Cover (looking toward Seneca St.)

Photo No.	Date
10	04/03/17

Direction Photo Taken:
SW

Description:
Soil Cover (looking toward Seneca St.)

Prepared By: THF

APPENDIX C

2016 GROUNDWATER MONITORING SUMMARY REPORT

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

24 January 2017
File No. 127836-002

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

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

Subject: 2016 Groundwater Monitoring Summary Report
Former American Linen Supply Co Facility
BCP Site Number: C915241
822 Seneca Street
Buffalo, New York

Dear Mr. Cook:

Haley & Aldrich of New York (Haley & Aldrich) is submitting this 2016 Groundwater Monitoring Summary Report summarizing the results from groundwater sampling events completed in May and November, 2016 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 is a requirement of the SMP.

This report presents the groundwater monitoring results from 2016 and provides an assessment of the results in accordance with the annual reporting requirements prescribed in Section 3.3 of the SMP.

It is noted that 2016 was the second year of semi-annual sampling at the Site. Per the SMP, subsequent sampling will be conducted on an annual basis.

WELL MAINTENANCE, CONVERSION, AND DECOMMISSIONING

The stick-up construction of wells MW-103, MW-104, MW-105, and MW-106 was not conducive for public access to the grassy area of the property as allowed by the property owner. As such, AmeriPride requested authorization from the NYSDEC to convert the four stick-up wells in the lawn to flush-mounted wells, and decommission wells on the property that are no longer part of the monitoring program. This request was authorized by the NYSDEC via email dated 5 May 2016 included in Appendix A.

Well conversions and abandonments were completed by Nothnagle Drilling of Rochester, New York on 26 May 2016 and documented by Haley & Aldrich. Groundwater monitoring wells located at the site that are not included in the groundwater monitoring program in the SMP (MW-2, MW-3, MW-5, MW-6 and BMW-106) were abandoned/removed. At overburden wells, the casings were removed. At bedrock well, BMW-106, the casing was cut five feet below the ground surface. Following removal of the casing, the holes were grouted using a bentonite slurry injected via a tremie rod and then backfilled with topsoil to the ground surface. MW-2, located in the paved area of the Site, was finished with a concrete surface seal to maintain integrity and continuity of the paved area cover system. Well decommissioning was performed in accordance with NYSDEC's "Groundwater Monitoring Well Decommissioning Procedures" dated November 2009.

Wells in the grassy area of the Site that are part of the ongoing media monitoring program of the SMP (MW-103, MW-104, MW-105, and MW-106) were converted to flush-mount completions using curb boxes.

Elevations of the newly converted flush-mount wells were re-surveyed by Hoffman Land Surveying and Geomatics on 6 June 2016. Updated Survey data is presented here in Appendix B.

GROUNDWATER SAMPLING EVENTS AND METHODOLOGY

Groundwater sampling was performed by Haley & Aldrich for AmeriPride Services, Inc. on 13 May 2016 and 21 November 2016, 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. Attempts made to locate the well during previous sampling events were not successful. Per email correspondence from the NYSDEC dated 5 May 2016, Haley & Aldrich was informed that continued attempts to locate the well will not be necessary, and reinstallation of the well will not be required. A copy of the correspondence is included in Appendix A. Well locations and site features are detailed on the attached site plan, Figure 1.

Groundwater Level Readings & Well Assessment

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 2016

events which are shown on Figures 2 and 3. The integrity of each well was assessed and needed repairs, if any, were recorded on the Static Water Levels Form (see Appendix C) during each sampling event. The need for minor well maintenance and/or repairs on multiple remaining wells were noted during the May 2016 sampling event, including replacement of well caps, locks, and J-plugs and re-seating the riser of MW-104 to the riser pipe below. The repairs were completed on 26 May 2016 as part of well maintenance activities described in the section below.

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 the day. Samples were analyzed for Target CVOCs only (PCE, TCE, cis-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 D. The groundwater data were 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 18 January 2017.

Purge water from the sampling events was containerized during each event and staged onsite in 55-gallon steel, open-top drums. Requests for "contained-in" determination were submitted to NYSDEC on 14 June and 8 December 2016, and determinations were received on 15 June and 20 January 2016 that the wastes do not have to be managed as hazardous waste. The purge water drums were removed from the site by NRC Environmental Services on 18 January 2017 and disposed as non-hazardous waste at Covanta Environmental in Niagara Falls, New York. Waste disposal documentation is included in Appendix E.

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 5.0 µg/L in November. The NYSDEC

[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.

groundwater standard and comparison criterion for VC is 2 µg/L. Though a slight increase from the previous events, this concentration remains within the same order of magnitude as previous concentrations, and therefore is considered consistent with previous concentrations of VC in this well since 2015. VC concentrations in MW-102R have decreased markedly compared to the sampling results from 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 in the groundwater from MW-105 and MW-106 at concentrations above NYSDEC criteria, but remain substantially lower than the pre-remediation concentrations detected in 2012. Other than what appear to be slight seasonal fluctuations in well MW-105, concentrations of CVOCs in these wells appear to be stable or decreasing. 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 2016 sampling events except for VC in well MW-303 in the November sampling event. Vinyl chloride was detected at an estimated concentration of 0.11µg/L, below the reportable limit of 1.0 µg/L. The NYSDEC groundwater standard and comparison criterion for VC is 2 µg/L.

The 2016 results indicate stable or decreased concentrations as compared to pre-remediation results. The results in MW-105 may reflect slight seasonal fluctuations, however the concentrations of CVOCs in that well have appeared to remain consistent since 2013. 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 compared to pre-remediation concentrations in MW-102R, therefore additional indoor air sampling at the 798 Seneca Street residence does not appear to be warranted at this time.

Two years of semi-annual sampling have been completed at the Site. Per to the SMP monitoring plan, sampling in 2017 and beyond will be conducted on an annual basis. The next event will be planned in Spring/Summer 2017.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK

Michael Clancy
Staff Scientist

Claire L. Mondello, CHMM
Associate | 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 13, 2016
Figure 3 – Groundwater Contour – November 21, 2016
Figure 4 – Groundwater Concentration Trends (MW-105 and MW-106)
Appendix A – NYSDEC Correspondence
Appendix B – 2016 Well Survey Data
Appendix C – Field Forms
Appendix D – Data Usability Summary Reports
Appendix E – Waste Disposal Documentation

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

Location		MW-101						MW-102/MW-102R					
Sample Date	NYSDEC TOGS 1.1.1 Class GA	12/11/2012	12/31/2013	05/05/2015	11/23/2015	5/13/2016	11/21/2016	12/11/2012	12/31/2013	05/05/2015	11/23/2015	5/13/2016	11/21/2016
Sample Depth (bgs)	ug/L	13.2 - 18.2 (ft)						9.7 - 14.7 (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)	ND (2.5)	**220**	**14**	ND (2.5)	ND (2.5)	ND (2.5)	ND (2.5)
Tetrachloroethene	5	ND (0.12)	ND (0.18)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	**5.7**	ND (0.18)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)
Trichloroethene	5	ND (0.15)	ND (0.17)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	**20.5**	ND (0.17)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)
Vinyl chloride	2	ND (0.13)	ND (0.33)	ND (1)	ND (1)	ND (1)	ND (1)	**54.9**	**60**	**2.8**	**2.8 J**	ND (1)	**5**

Notes and Abbreviations:

1. "ND" indicates analyte not detected above the method detection limit shown.

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
BUFFALO, NY
BCP SITE #C915241

Location		MW-103							MW-104						
Sample Date	NYSDEC TOGS 1.1.1 Class GA	12/14/2012 (Dup)	12/14/2012	12/26/2013	05/05/2015	11/23/2015	5/13/2016	11/21/2016	12/13/2012	12/26/2013	05/05/2015	05/05/2015 (Dup)	11/23/2015	5/13/2016	11/21/2016
Sample Depth (bgs)	ug/L	11.2 - 1.62 (ft)							11.3 - 16.3 (ft)						
Volatile Organic Compounds (ug/L)															
cis-1,2-Dichloroethene	5	**28.6 J**	**28.9 J**	ND (2.8)	ND (2.5)	ND (2.5)	ND (2.5)	ND (2.5)	ND (0.2)	ND (0.7)	ND (2.5)	ND (2.5)	ND (2.5)	ND (2.5)	ND (2.5)
Tetrachloroethene	5	4.8	4.4	ND (0.72)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.12)	ND (0.18)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)
Trichloroethene	5	3	2.9	ND (0.7)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.15)	ND (0.17)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)
Vinyl chloride	2	**55.8**	**55.1**	ND (1.3)	ND (1)	0.23 J	ND (1)	0.28 J	ND (0.13)	ND (0.33)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)

Notes and Abbreviations:

1. "ND" indicates analyte not detected above the method detection limit shown.

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
BUFFALO, NY
BCP SITE #C915241

Location		MW-105						MW-106								
Sample Date	NYSDEC TOGS 1.1.1 Class GA	12/13/2012	12/27/2013	05/05/2015	11/23/2015	5/13/2016	11/21/2016	12/14/2012	12/26/2013	05/05/2015	11/23/2015	11/23/2015 (dup)	05/13/2016	05/13/2016 (dup)	11/21/2016	11/21/2016 Dup
Sample Depth (bgs)	ug/L	11.5 - 16.5 (ft)						11.1 - 16.1 (ft)								
Volatile Organic Compounds (ug/L)																
cis-1,2-Dichloroethene	5	**99.2 J**	**49**	**37**	**61 J**	**43**	**59**	**160 J**	ND (7)	**11**	**13 J**	**12 J**	**7.9**	**8 J**	**4.1**	**3.4**
Tetrachloroethene	5	**21.5 J**	1	0.49 J	**7.1 J**	1.8	3.3	**58.4**	ND (1.8)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)
Trichloroethene	5	**14.1 J**	1.3	0.5	4.1 J	1.8	3.9	**47.4**	ND (1.7)	0.35 J	0.40 J	0.41 J	0.33 J	0.31 J	ND (0.5)	ND (0.5)
Vinyl chloride	2	**4.6 J**	0.54 J	0.41 J	**3.0 J**	**2.8**	**6.6**	**99.7**	**12**	**17**	**26 J**	**23 J**	**9.2 J**	ND (1)	**6.4**	**5.8**

Notes and Abbreviations:

1. "ND" indicates analyte not detected above the method detection limit shown.

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
BUFFALO, NY
BCP SITE #C915241

Location		MW-301						MW-303					
Sample Date	NYSDEC TOGS 1.1.1 Class GA	03/27/2013	12/30/2013	05/05/2015	11/23/2015	5/13/2016	11/21/2016	03/27/2013	12/30/2013	05/05/2015	11/23/2015	5/13/2016	11/21/2016
Sample Depth (bgs)	ug/L	13.5 - 18.5 (ft)						11.1 - 15.8 (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)	ND (2.5)	ND (0.2)	ND (0.7)	ND (2.5)	ND (2.5)	ND (2.5)	ND (2.5)
Tetrachloroethene	5	ND (0.12)	ND (0.18)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.12)	ND (0.18)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)
Trichloroethene	5	4	ND (0.17)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	1.8	ND (0.17)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)
Vinyl chloride	2	ND (0.13)	ND (0.33)	ND (1)	ND (1)	ND (1)	ND (1)	ND (0.13)	ND (0.33)	ND (1)	ND (1)	ND (1)	0.11 J

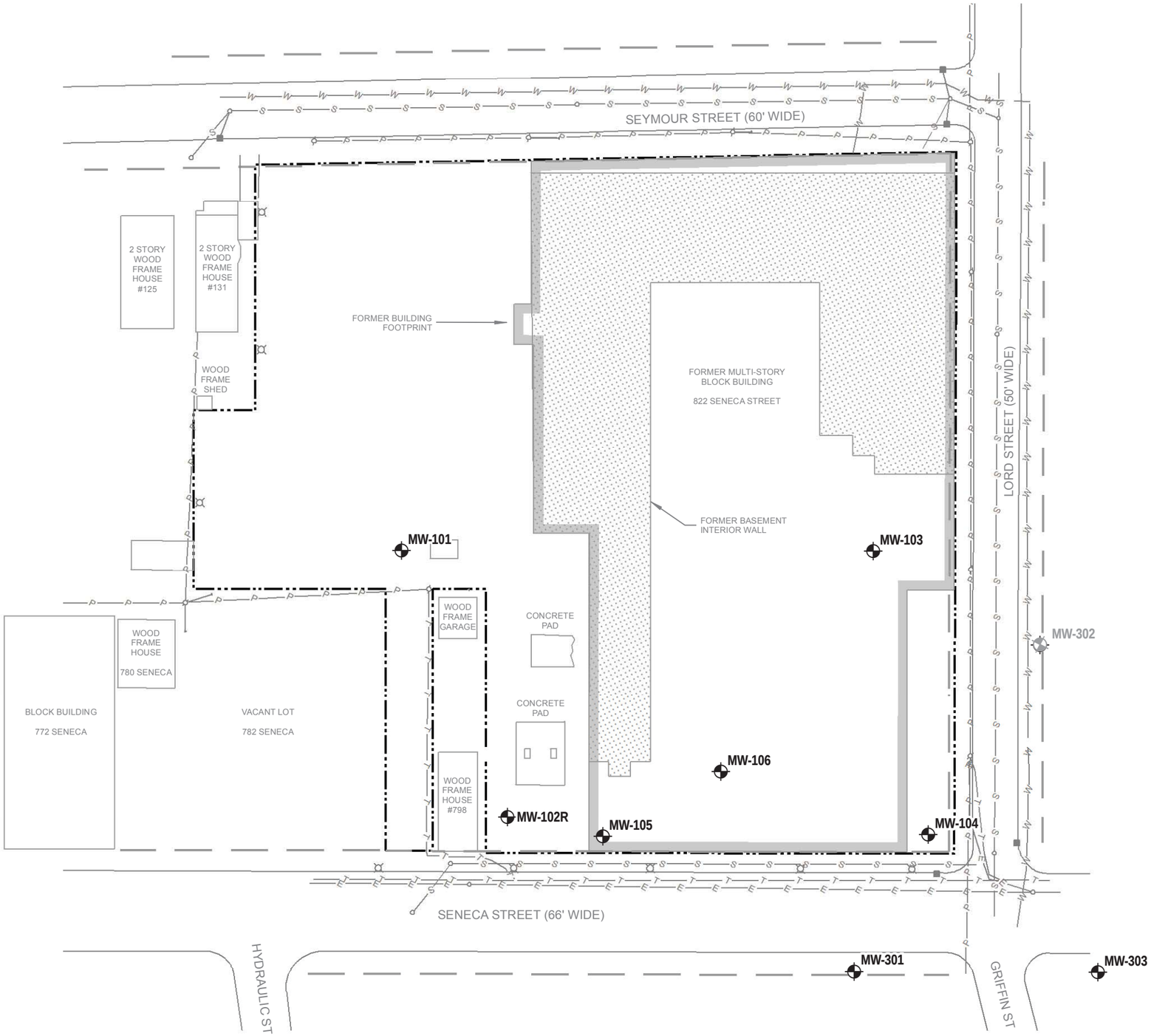
Notes and Abbreviations:

1. "ND" indicates analyte not detected above the method detection limit shown.

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 - DESTROYED
- P — OVERHEAD POWER
- S — SANITARY SEWER
- T — UNDERGROUND TELEPHONE
- E — UNDERGROUND ELECTRIC
- W — UNDERGROUND WATER

NOTES

1. MONITORING WELLS MW-101, MW-102R, MW-103, MW-104, MW-105 AND MW-106 INSTALLED IN 2012.
2. MONITORING WELLS MW-301, M-302 AND MW-303 INSTALLED IN 2013.
3. MONITORING WELL MW-302 WAS DESTROYED.
4. SITE BOUNDARY AND PROPERTY BOUNDARY ARE THE SAME.
5. BASEMENT DIMENSIONS ARE APPROXIMATE.
6. BASE MAP SOURCE: HOFFMAN LAND SURVEYING, JANUARY 1, 2014

0 50 100
SCALE IN FEET

HALEY ALDRICH

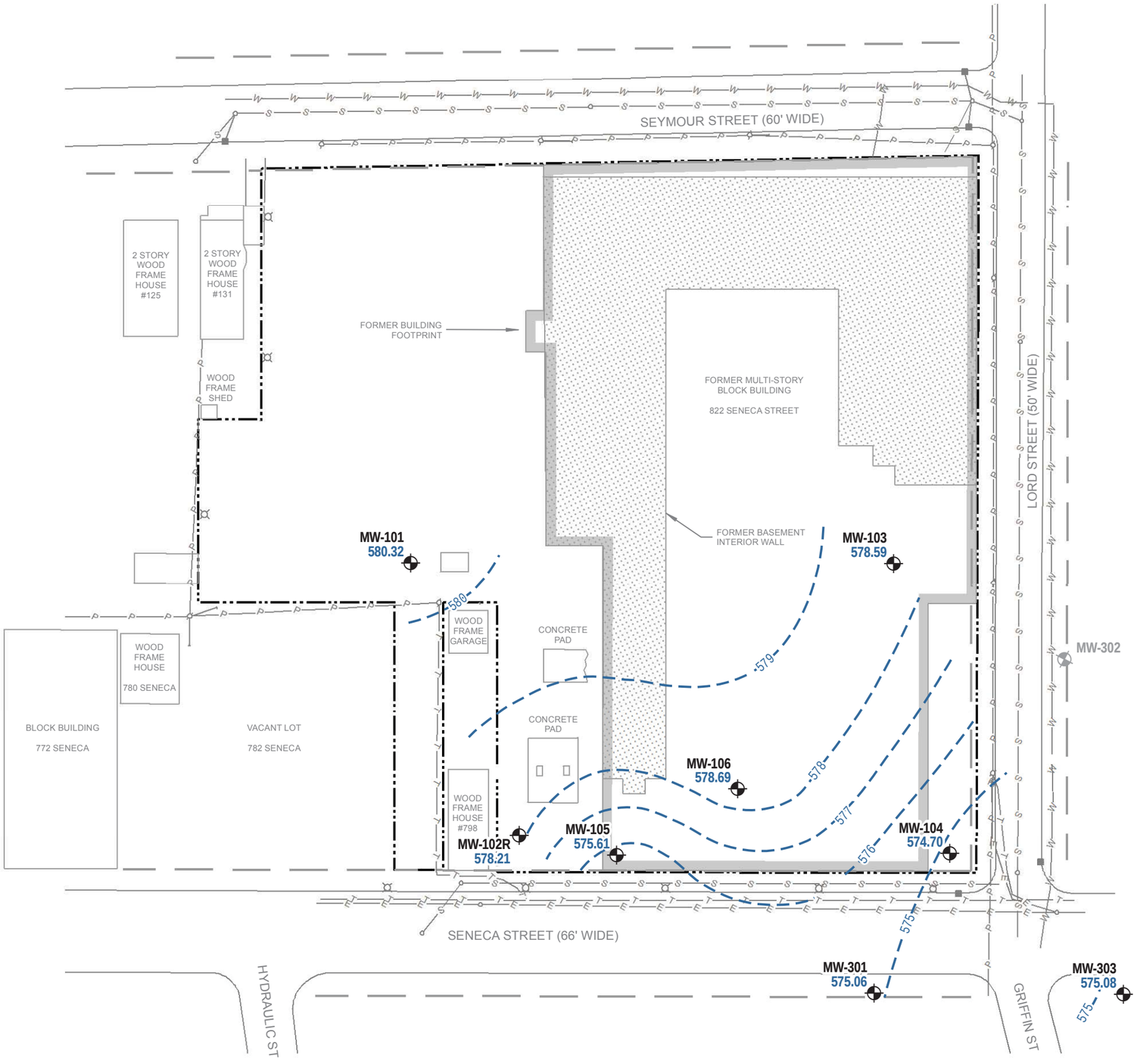
FORMER AMERICAN LINEN SUPPLY COMPANY
822 SENECA STREET
BUFFALO, NEW YORK

GROUNDWATER MONITORING WELL NETWORK

JANUARY 2017

FIGURE 1

GIS FILE PATH: G:\37319 (AmeriPride, 8 Lord Street, Buffalo)\GIS\Maps\2017_01\127836_002_00MB_GROUNDWATER_CONTOUR_2016_TJV_BL1.mxd — USER: tvogler — LAST SAVED: 1/9/2017 2:46:47 PM



LEGEND

- MONITORING WELL
- MONITORING WELL - DESTROYED
- GROUNDWATER POTENTIOMETRIC CONTOUR (FT AMSL), CONTOUR INTERVAL = 1 FT
- P — OVERHEAD POWER
- S — SANITARY SEWER
- T — UNDERGROUND TELEPHONE
- E — UNDERGROUND ELECTRIC
- W — UNDERGROUND WATER

NOTES

1. GROUNDWATER DEPTHS MEASURED MAY 13, 2016 BY H&A PERSONNEL.
2. GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL (AMSL).
3. SITE BOUNDARY AND PROPERTY BOUNDARY ARE THE SAME.
4. BASE MAP SOURCE: HOFFMAN LAND SURVEYING, JANUARY 1, 2014

N

0 50 100
SCALE IN FEET

HALEY ALDRICH

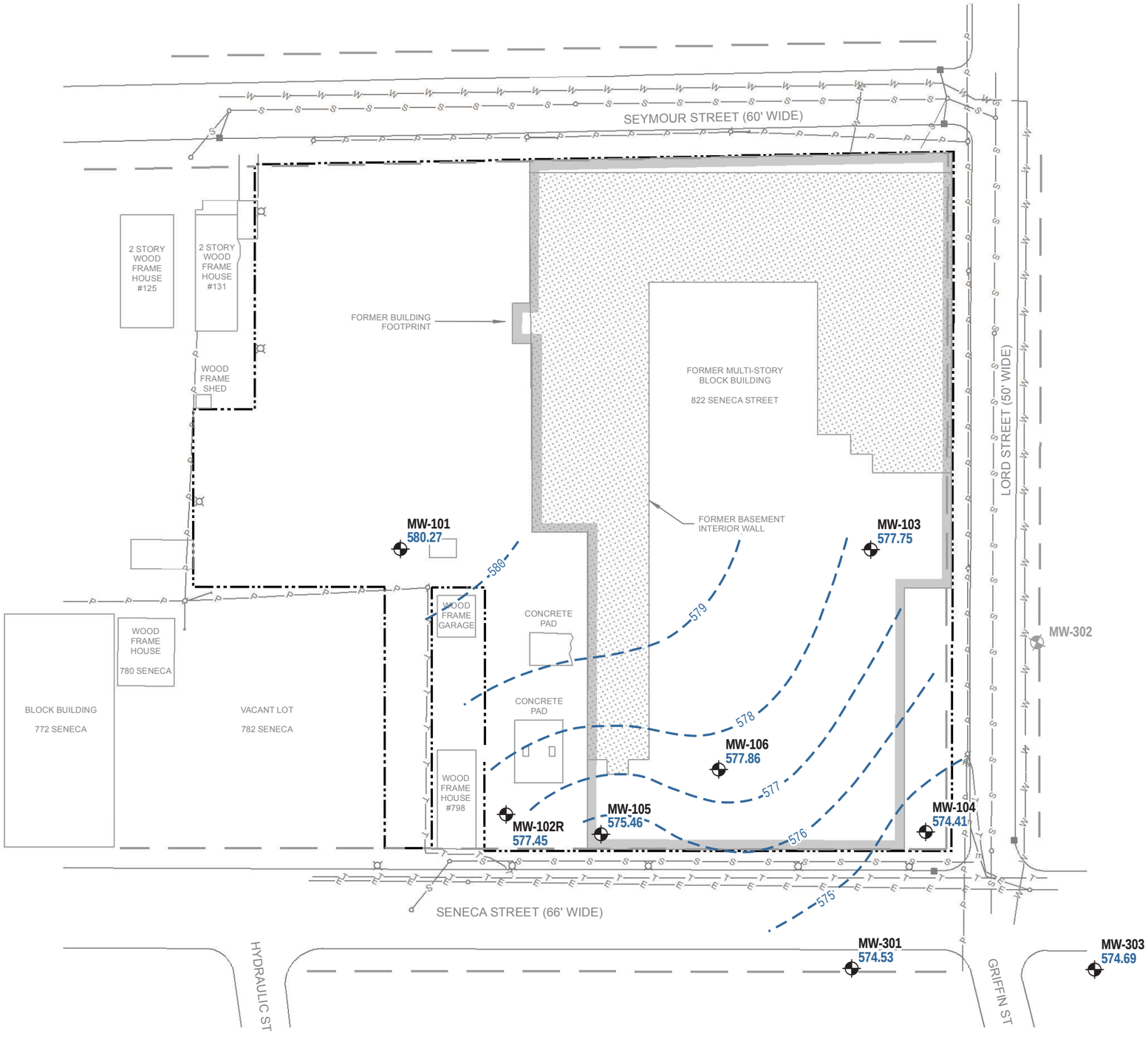
FORMER AMERICAN LINEN SUPPLY COMPANY
822 SENECA STREET
BUFFALO, NEW YORK

GROUNDWATER CONTOUR - MAY 13, 2016

JANUARY 2017

FIGURE 2

GIS FILE PATH: G:\37319 (AmeriPride, 8 Lord Street, Buffalo)\GIS\Maps\2017_01\127836_002_00MB_GROUNDWATER_CONTOUR_2016_TJV_BL1.mxd — USER: tvogler — LAST SAVED: 1/9/2017 2:46:47 PM



LEGEND

- MONITORING WELL
- MONITORING WELL - DESTROYED
- GROUNDWATER POTENTIOMETRIC CONTOUR (FT AMSL), CONTOUR INTERVAL = 1 FT
- P — OVERHEAD POWER
- S — SANITARY SEWER
- T — UNDERGROUND TELEPHONE
- E — UNDERGROUND ELECTRIC
- W — UNDERGROUND WATER

NOTES

1. GROUNDWATER DEPTHS MEASURED NOVEMBER 21, 2016 BY H&A PERSONNEL.
2. GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL (AMSL).
3. SITE BOUNDARY AND PROPERTY BOUNDARY ARE THE SAME.
4. BASE MAP SOURCE: HOFFMAN LAND SURVEYING, JANUARY 1, 2014

0 50 100
SCALE IN FEET

HALEY ALDRICH

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

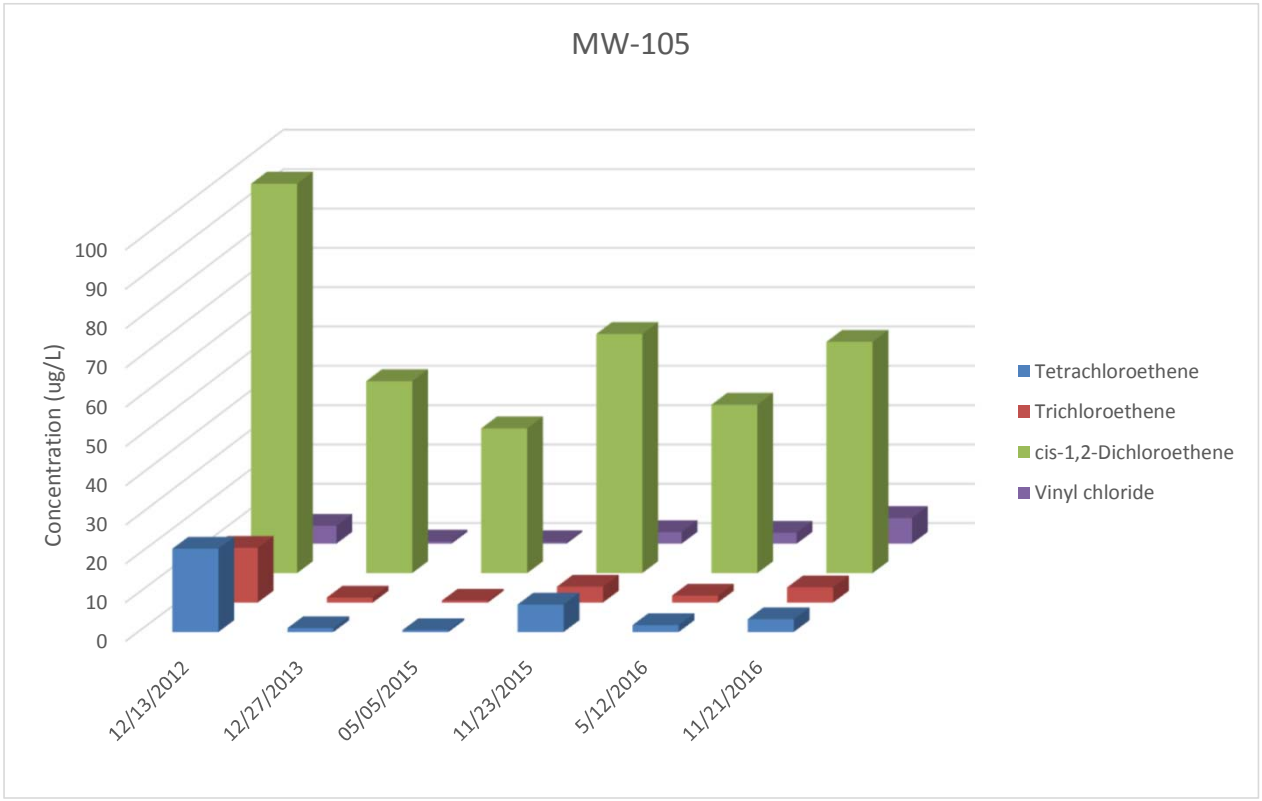
GROUNDWATER CONTOUR - NOVEMBER 21, 2016

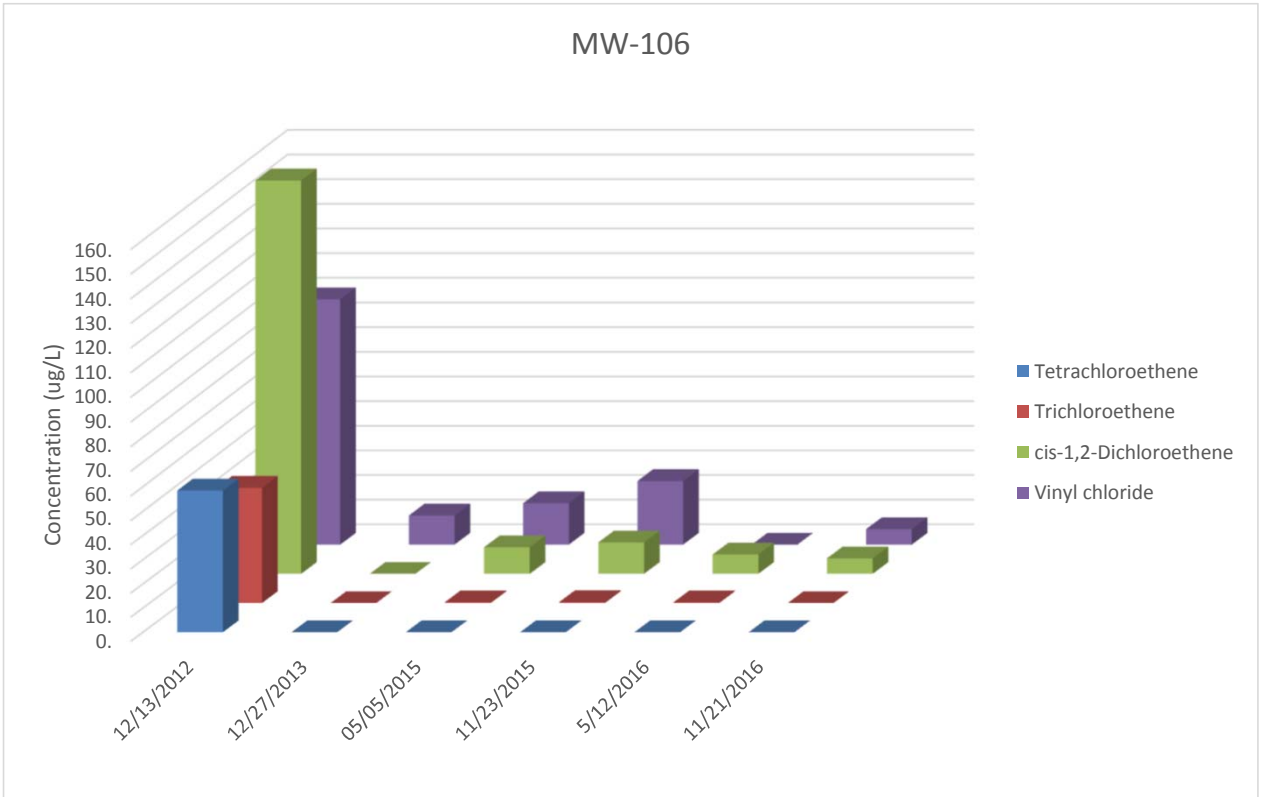
JANUARY 2017

FIGURE 3

GIS FILE PATH: G:\37319 (AmeriPride, 8 Lord Street, Buffalo)\GISMaps\2017_01\127836_002_00MB_GROUNDWATER_CONTOUR_2016_TJV_BL1.mxd — USER: tvogler — LAST SAVED: 1/9/2017 2:46:47 PM

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





APPENDIX A

NYSDEC Correspondence

Mondello, Claire

From: Walia, Jaspal (DEC) <jaspal.walia@dec.ny.gov>
Sent: Thursday, May 05, 2016 11:01 AM
To: Mondello, Claire
Cc: Burke, Sam; White, Glenn; Cook, Randy; Szymanski, David (DEC)
Subject: RE: Former American Linen Supply Facility Upcoming Activities

Claire,

As discussed earlier to-day:

1. The monitoring wells (MW-2, MW-3, MW-5, MW-6, and BMW-106) which are not part of the groundwater monitoring under the current SMP can be decommissioned.
2. The proposal to make MW-103, MW-104, MW-105, and MW-106 flush-mount, is acceptable.
3. Based upon the previous groundwater monitoring data, the missing well MW-302 does not need to be replaced.

Should there be any questions relative to this email, please feel free to call me at (716) 851-7220.

Jaspal S. Walia

From: Mondello, Claire [mailto:CMondello@haleyaldrich.com]
Sent: Thursday, May 05, 2016 9:37 AM
To: Walia, Jaspal (DEC)
Cc: Burke, Sam; White, Glenn; Cook, Randy
Subject: Former American Linen Supply Facility Upcoming Activities

Jaspal –

It was nice speaking with you this morning. I'm providing this email to document our conversation regarding upcoming field activities planned for the Former American Linen Supply Co. Facility (C915241). We are planning to conduct the following site work:

1. We will close and remove the following wells onsite that are not part of the ongoing monitoring program: MW-2, MW-3, MW-5, MW-6, BMW-106. The well decommissioning will be done in accordance with Section 3.3.1.2 of the Site Management Plan and the NYSDEC's "Groundwater Monitoring Well Decommissioning Procedures."

2. We will cut down the risers and make flush-mount the following wells located in the grassy areas of the site in order to facilitate use of the property: MW-103, MW-104, MW-105, MW-106. The wells will be resurveyed following modification.

3. Per our discussion, we understand that it is not necessary to reinstall missing well MW-302 that was formerly located in Lord Street (likely destroyed when the sidewalk was reconstructed) and sampling of that location is no longer required as part of the monitoring program.

Please respond as soon as possible that you approve the decommissioning of the unused wells and that you concur with this email. We anticipate conducting the Spring 2016 sampling sometime between March 16th and March 27th. Well

decommissioning is tentatively planned for the end of this month. I'll send you a subsequent email once the schedule is finalized.

Thank You,
- Claire

Claire L. Mondello, CHMM
Associate|Senior Project Manager

Haley & Aldrich, Inc.
200 Town Centre Drive | Suite 2
Rochester, NY 14623

T: 585.321.4219
C: 585.698.9052

www.haleyaldrich.com

APPENDIX B

2016 Well Survey Data

HALEY ALDRICH

Former Ameripride Site
Intersection of Lord & Seneca Streets
Buffalo, NY

HOFFMAN
LAND SURVEYING AND GEOMATICS

Monitoring Well update June 1, 2016
Control: Original project control utilized for this survey.

MON. Well	Northing	Easting	Elevation	Description
MW-105	1047859.71	1077555.99	582.8	CL CASE (FLUSH)
MW-105	1047859.84	1077556.02	582.41	N SIDE PVC RSR
MW-106	1047861.39	1077628.08	582.8	CL CASE (FLUSH)
MW-106	1047861.47	1077628.12	582.42	N SIDE PVC RSR
MW-104	1047779.90	1077711.11	582.4	MW-104 CL CASE (FLUSH)
MW-104	1047780.00	1077711.19	582.00	N SIDE RSR
MW-103	1047928.50	1077754.93	583.2	CL CASE (FLUSH)
MW-103	1047928.57	1077755.03	582.64	N SIDE PVC RSR

APPENDIX C

Field Forms

GROUNDWATER SAMPLING RECORD

PROJECT	Ameripride	H&A FILE NO.	37319-060
LOCATION	622 Sierra St, Buffalo NY	PROJECT MGR.	C. Mondello
CLIENT	Ameripride Services	FIELD REP	S. Burke
CONTRACTOR	—	DATE	5/13/16

GROUNDWATER SAMPLING INFORMATION

Well No.	MW-102	MW-105	MW-106	MW-103	MW-104	MW-301
Water Depth (ft)	7.09	9.07	5.42	7.77	10.43	7.08
Time	0900	0905	0907	0910	0911	0913
Product	N	N	N	N	N	N
Depth Of Well (ft)	19.75	18.06	17.25	17.10	19.27	18.53
Inside Diameter (in)	2"	2"	2"	2"	2"	2"
Standing Water Depth (ft) [1]	12.66	8.99	11.83	9.33	8.84	11.45
Volume Of Water In Well (gal)	2.0	1.4	1.9	1.5	1.5	1.8
Purging Device	Bailer	Bailer	Bailer	Bailer	Bailer	Bailer
Volume of Bailer/Pump Capacity						
Cleaning Procedure						
Bails Removed/ Volume Removed (gal)	6.1	4.4	5.7	4.5	4.5	5.5
Time Purging Started						
Time Purging Stopped						
Sampling Device						
Cleaning Procedure						
TIME SAMPLES TAKEN — VOCs	0935	1015	1040	1105	1115	1150
	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

GROUNDWATER SAMPLING RECORD

PROJECT	Amerpride	H&A FILE NO.	37319-060
LOCATION	822 Seneca St, Buffalo NY	PROJECT MGR.	C. Mondello
CLIENT	Amerpride Services	FIELD REP	S. Burke
CONTRACTOR	—	DATE	5/13/16

GROUNDWATER SAMPLING INFORMATION

Well No.	MW-303	MW-101				
Water Depth (ft)	6.71	4.90				
Time	0916	0917				
Product	N	N				
Depth Of Well (ft)	16.11	17.77				
Inside Diameter (in)	2"	2"				
Standing Water Depth (ft) [1]	9.40	12.87				
Volume Of Water In Well (gal)	1.5	2.1				
Purging Device	Bailer	Bailer				
Volume of Bailer/Pump Capacity						
Cleaning Procedure						
Bails Removed/ Volume Removed	4.5	6.3				
Time Purging Started						
Time Purging Stopped						
Sampling Device						
Cleaning Procedure						
TIME SAMPLES TAKEN — VOCs	1140	1215				
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

Static Water Levels

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

Date: 5/13/2016
Performed By: SRR, RSL
Job Number: 37319-060

Well ID	Riser Elevation* (NAVD 1988)	Water Level (from Top of Riser)	Well Condition/Notes	Repairs Needed?
MW-101	585.22	4.90	J-plug OK, lock on J-plug, No well lid (Flush)	Yes
MW-102R	585.3	7.09	J-plug OK Lock broken	
MW-103	586.36	7.77	No lock J-plug OK	
MW-104	585.13	10.43	Lock broken, riser unseated J-plug OK	Yes
MW-105	584.68	9.07	J-plug OK Lock broken	
MW-106	584.11	5.42	J-plug OK Lock broken	
MW-301	582.14	7.08 ~~6.71~~	J-plug OK No lock (Flush)	
MW-302	581.35		Not Found	
MW-303	581.79	6.71 ~~7.08~~	J-plug OK No lock (Flush)	

* - Riser elevations were surveyed in 2014.

GROUNDWATER SAMPLING RECORD

PROJECT	Ameripride	H&A FILE NO.	127836-002
LOCATION	822 Seneca St, Buffalo NY	PROJECT MGR.	C. Mondello
CLIENT	Ameripride Services	FIELD REP	S. Burke
CONTRACTOR	—	DATE	11/21/16

GROUNDWATER SAMPLING INFORMATION

		MW-101	MW-102R	MW-103	MW-104	MW-105	MW-106
Well No.							
Water Depth (ft)		4.95	7.85	4.89	7.59	6.95	4.56
Time		0940	0941	0950	0952	0945	0947
Product		N	N	N	N	N	N
Depth Of Well (ft)		17.79	19.75	13.39	16.14	15.81	15.60
Inside Diameter (in)		2	2	2	2	2	2
Standing Water Depth (ft) [1]		12.84	11.90	8.50	8.55	8.86	11.04
Volume Of Water In Well (gal)		2.05	1.90	1.36	1.37	1.42	1.77
Purging Device		Bailer	Bailer	Bailer	Bailer	Bailer	Bailer
Volume of Bailer/Pump Capacity							
Cleaning Procedure							
Bails Removed/ Volume Removed		6.2	5.7	4.1	1.3*	4.3	5.3
Time Purging Started							
Time Purging Stopped							
Sampling Device							
Cleaning Procedure							
TIME SAMPLES TAKEN	VOCs	1030	1040	1115	1130	1220	1230
			+MS/MSD				+Dup
					* Well dry		
					after 1.3		
					gal - high		
					turbidity		
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

GROUNDWATER SAMPLING RECORD

PROJECT	Ameripride	H&A FILE NO.	127836-002
LOCATION	822 Seneca St, Buffalo NY	PROJECT MGR.	C. Mondello
CLIENT	Ameripride Services	FIELD REP	S. Burke
CONTRACTOR	—	DATE	11/21/16

GROUNDWATER SAMPLING INFORMATION

Well No.		MW-301	MW-303				
Water Depth (ft)		7.61	7.10				
Time		0956	0959				
Product		N	N				
Depth Of Well (ft)		18.54	16.11				
Inside Diameter (in)		2	2				
Standing Water Depth (ft) [1]		10.93	9.01				
Volume Of Water In Well (gal)		1.75	1.44				
Purging Device		Bailer	Bailer				
Volume of Bailer/Pump Capacity							
Cleaning Procedure							
Bails Removed/ Volume Removed		5.3	4.4				
Time Purging Started							
Time Purging Stopped							
Sampling Device							
Cleaning Procedure							
TIME SAMPLES TAKEN	VOCs	1315	1325				
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

Static Water Levels

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

Date: 11/21/16
Performed By: S. Burke / ~~B. Lydell~~ M. Clancy
Job Number: 127836-002

Well ID	Riser Elevation* (NAVD 1988)	Water Level (from Top of Riser)	Well Condition/Notes	Repairs Needed?
MW-101	585.22	4.95	Ok	N
MW-102R	585.3	7.85	Lock broken, all else ok	N
MW-103	† ~~586.36~~ 582.64	4.89	Ok	N
MW-104	† ~~585.13~~ 582.00	7.59	Ok	N
MW-105	† ~~584.68~~ 582.41	6.95	Ok	N
MW-106	† ~~584.11~~ 582.42	4.56	Ok	N
MW-301	582.14	7.61	Ok	N
MW-302	581.35	–	Well Destroyed	–
MW-303	581.79	7.10	Ok	N

* - Riser elevations were surveyed in 2014.

† - Wells resurveyed in 2016 after flush mount conversion

APPENDIX D

Data Usability Summary Reports

HALEY ALDRICH

Data Usability Summary Report (DUSR)
AmeriPride Groundwater - May 2016
Analytical Laboratory: Alpha Analytical - Westborough, MA
Sample Delivery Group # L1614687

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-014-002)

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	Sample ID	Sample ID
MW-101-160513-1215	MW-105-160513-1015	3188-160513-0001
MW-102R-160513-0935	MW-106-160513-1040	3188-160513-0002
MW-103-160513-1105	MW-301-160513-1150	
MW-104-160513-1115	MW-303-160513-1140	

Project Samples were analyzed according to the following analytical methods:

	Parameter	Analytical Method	Holding Time Criteria
1.	VOCs	EPA 8260C	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
- Field Duplicate Sample Analysis
- 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 compounds were not detected in associated blank samples (trip, equipment, method) prepared and analyzed concurrently with the project samples, with the following exception(s):

Blank	Target Analyte(s)	Concn.	Affected Sample(s)	Qualifiers
3188-160513-0001 Trip Blank	4 Target VOCs	ND	None, Trip Blank ND.	None.

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, with the following exception(s):

Surrogate Percent Recovery Criteria				
Surrogate		**Aqueous Matrix (%)**	**Solid Matrix (%)**	**Vapor Matrix (%)**
Dibromofluoromethane	S01	70 - 130	- -	- -
1,2-Dichloroethane-d4	S02	70 - 125	- -	- -
Toluene-d8	S03	80 - 120	- -	- -
4-Bromofluorobenzene	S04	70 - 130	- -	- -

Project Sample ID	Matrix	S01 %R	S02 %R	S03 %R	S04 %R	Positive Results	Non Detect (ND)
MW-303-160513-1140	W	-	126	-	-	J+	-
MW-101-160513-1215	W	-	126	-	-	J+	-
MW-106-160513-1040	W	-	127	-	-	J+	-

Affected Analytes

According to the Alpha SOP, Tetrachloroethene is targeted by Toluene-d8 and Vinyl Chloride, cis-1,2-Dichloroethene and Trichloroethene are targeted by Dibromofluoromethane and 1,2-Dichloroethane-d4.

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, with the following exception(s):

LCS ID / Project Sample MS	Type	Target Analyte(s)	%R Criteria	%R	%RPD	Affected Sample(s)
LCS	LCS	2-Chloroethylvinyl ether	70 - 130	170		None, not target analyte.
WG895513-3, -4	LCS	Iodomethane	70 - 130	49		None, not target analyte.
LCSD	LCSD	2-Chloroethylvinyl ether	70 - 130	190	11	None, not target analyte.
WG895513-3, -4	LCSD	Iodomethane	70 - 130	54	10	None, not target analyte.
LCS	LCS	2-Chloroethylvinyl ether	70 - 130	56		None, not target analyte.
WG895666-1, -2	LCS	Iodomethane	70 - 130	52		None, not target analyte.
LCSD	LCSD	2-Chloroethylvinyl ether	70 - 130	56	0	None, not target analyte.
WG895666-1, -2	LCSD	Chloromethane	64 - 130	69	**36**	None, not target analyte.
	LCSD	Iodomethane	70 - 130	52	0	None, not target analyte.
LCS	LCS	2-Chloroethylvinyl ether	70 - 130	47		None, not target analyte.
WG895722-1, -2	LCS	tert-Butyl Alcohol	70 - 130	132		None, not target analyte.
LCSD	LCSD	2-Chloroethylvinyl ether	70 - 130	40	16	None, not target analyte.
WG895722-1, -2	LCSD	tert-Butyl Alcohol	70 - 130	131	1	None, not target analyte.
MW-102R-160513-0935	MS	1,2-Dichloroethane	70 - 130	133		None, not target analyte.
WG895666-4, -5		1,1,1-Trichloroethane	67 - 130	135		None, not target analyte.
		tert-Butyl Alcohol	70 - 130	146		None, not target analyte.
		Acetone	58 - 148	151		None, not target analyte.
		Iodomethane	70 - 130	64		None, not target analyte.
MW-102R-160513-0935	MSD	1,1,1-Trichloroethane	67 - 130	134	7	None, not target analyte.
WG895666-4, -5		tert-Butyl Alcohol	70 - 130	143	1	None, not target analyte.
		Iodomethane	70 - 130	80	**22**	None, not target analyte.

Field Duplicate Sample Analysis

The overall variability attributable to the sampling procedure, sample matrix, and laboratory procedures, was evaluated by assessing the relative percent difference (RPD) data from field duplicate samples. All calculated RPD values were within matrix specific data quality objectives, with the exception of results qualified "J" as shown in the table(s) below:

Target Analyte(s)	Original Sample ID. MW-106-160513-1040	FD Sample ID. 3188-160513-0002	%RPD	Flag Original and FD sample results with:
cis-1,2-Dichloroethene	8 ug/L	7.9 ug/L	NA	None, Abs. Diff < RL
Tetrachloroethene	0.5 U ug/L	0.5 U ug/L	NA	None, Both ND.
Vinyl chloride	1 U ug/L	9.2 ug/L	NA	**J Flag; Abs. Diff > RL**
Trichloroethene	0.31 J ug/L	0.33 J ug/L	NA	None, Abs. Diff < RL

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.

Date: 6/15/2016

Data Usability Summary Report (DUSR)
AMERIPRIDE (GW MONITORING)
Analytical Laboratory: Alpha Analytical - Westborough, MA
Sample Delivery Group # L1637983

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
MW101-161121-1030
MW102-161121-1040
MW103-161121-1115
MW104-161121-1130
MW105-161121-1220
MW106-161121-1230
MW-301-161121-1315
MW-303-161121-1325
3188-161121-0001
3188-161121-0002

Project Samples were analyzed according to the following analytical methods:

	Parameter	Analytical Method	Holding Time Criteria
1.	VOCs	EPA 8260B/624	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, with the following exception(s):

LCS ID / Project Sample MS	Type	Target Analyte(s)	%R Criteria	%R	%RPD	Affected Sample(s)
Samples 1-7	LCS	2-Chloroethylvinyl ether	70 - 130	62	20	MW101-161121-1030
WG955630-3	LCS	tert-Butyl Alcohol	70 - 130	56	20	MW103-161121-1115
WG955630-4	LCS	2,2-Dichloropropane	63 - 133	56	20	MW104-161121-1130
	LCS	Ethyl-Tert-Butyl-Ether	70 - 130	64	20	MW105-161121-1220
						MW-303-161121-1325
Samples 8-11	LCS	2-Chloroethylvinyl ether	70 - 130	33	20	3188-161121-0001
WG955687-3						3188-161121-0002

Action:

If the LCS %R is greater than the upper acceptance limit, associated target analyte positive results are qualified "J" and non-detects should not be qualified. If the LCS %R is less than the lower acceptance limit associated target analyte positive results are qualified "J" and non-detects are qualified "R". If the MS/MSD is from a project sample and the %R greater than the upper acceptance limit, associated target analyte positive results are qualified "J" and non-detects should not be qualified. If the MS/MSD %R is >10%, but less than the lower acceptance limit, associated analyte positive results are qualified "J" and non-detects are qualified "UJ". If the MS/MSD %R is less than 10% associated target analyte positive results are qualified "J" and non-detects are qualified "R". MS/MSD qualifiers are only applied to affected samples of the same matrix. If the MS/MSD is a LAB sample do not qualify project samples.

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 E

Waste Disposal Documentation

HALEY ALDRICH

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 I F: (518) 402-9627
www.dec.ny.gov

June 15, 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: 25th 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 June 14, 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 or to a local publically owned treatment water (POTW), 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

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 I F: (518) 402-9627
www.dec.ny.gov

December 8, 2016

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

Re: 26th 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 L1638454) submitted with your December 8, 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 in November 2016, 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 approximately 35 gallons of 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 or a local publically owned treatment water (POTW), 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: D. Szymanski, DER Region 9

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. 03488

2. Page 1 of 1

3. Generator's Name and Mailing Address
AmeriPride Services, Inc.
850 Industrial Boulevard, NE, Minneapolis, MN 55413
4. Generator's Phone ( ) 612-676-8000 Attn: Randy Cook

822 Seneca Street
Buffalo NY

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

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

A. State Transporter's ID
B. Transporter 1 Phone 716-525-1982

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
Environmental & Industrial Contracting Inc
3335 Quarry Rd.
Niagara Falls, NY 14304

10. US EPA ID Number
N / A

E. State Facility's ID
F. Facility's Phone 716-298-5287

GENERATOR

11. WASTE DESCRIPTION	Containers No.	Containers Type	13. Total Quantity	14. Unit Wt./Vol.
a. NON DOT Regulated Liquids,NOS(Contaminated Water)	2	DM	110	G
b.				
c.				
d.				

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

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

15. Special Handling Instructions and Additional Information
In Case of Emergency call 1-800-225-6750.

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: Mike Cleary
Signature:
Date: Month 1 Day 18 Year 17

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Mike Reilly
Signature:
Date: Month 1 Day 18 Year 17

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