Periodic Review Report

Fmr. American Linen Supply Company Site

BCP Site No. C915241
822 Seneca Street

April 2018 0126-018-003

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 2018 B0126-018-003

Prepared for:

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

Prepared By:

Benchmark Environmental Engineering & Science, PLLC
2558 Hamburg Turnpike, Suite 300
Buffalo, NY 14218
(716)856-0599

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 (i.e. the "Site"), located in the City of Buffalo, Erie County, New York (see Figure 1).

This PRR and the associated Institutional and Engineering Control (IC/EC) Certification Forms (see Appendix A) have been prepared for the March 24, 2017 to March 24, 2018 reporting period in accordance with the NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation (Ref. 1).

1.1 Site Background

The Site, which is the location of the Former American Linen Supply Company Facility located at 822 Seneca Street in the City of Buffalo, Erie County, New York, 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. 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).

Previous reports indicate that 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. 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

No violations of the Site Management Plan (SMP) or associated Institutional and Engineering Control (IC/EC) and monitoring requirements were identified during the subject monitoring period.

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 2, 2018, 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 sample locations are shown on Figure 2. RI 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.

Environmental investigations of the Site identified the presence of chlorinated volatile organic compounds (cVOCs) including 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 2, 2018, Benchmark's Certifying Professional Engineer performed a Site visit and assessment. During this visit, the Site covered by this PRR was found to be 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 (completed November 21, 2016); 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 2, 2018, 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 has been performed on a semi-annual basis for a period of two years post-COC, with the final semi-annual event completed on November 21, 2016. An annual monitoring event was conducted on July 11, 2017. 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	

The July 11, 2017 groundwater monitoring results are presented in Appendix C. Groundwater monitoring data from the 2017 event as well as prior events are summarized in the 2017 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, "The 2017 results indicate stable or decreased concentrations as compared to pre-remediation results. The results in MW-105 since 2013 may reflect slight seasonal fluctuations, however the overall concentrations of CVOCs in that well as well as in the other source area well MW-106 have appeared to remain consistent or decreasing since 2013. Based on the analytical data, target CVOCs do not appear to be migrating off site."

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.

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 the property continues to be used as a residence and concentrations of cVOCs in MW-102R indicate an increasing trend. As presented in the 2017 Groundwater Monitoring Summary Report in Appendix C, target cVOCs have decreased compared to pre-remediation concentrations in MW-102R, with all target cVOCs reported during the most recent sampling event as non-detect or below their respective Class GA GWQS. Therefore further evaluation of indoor air and sub-slab vapor in the adjacent residence at 798 Seneca Street does not appear to be required 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 2018 site reconnaissance and the 2017 groundwater monitoring event results performed during the current reporting period, our conclusions are as follows:

- At the time of our April 2018 site reconnaissance, the Site covered by this PRR was fully compliant with the IC/EC requirements.

Conclusions regarding groundwater quality are presented in the 2017 Groundwater Monitoring Summary Report in Appendix C. In general, the report indicates 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 below the Class GA GWQS. Based on these data additional indoor air sampling at the 798 Seneca Street residence does not appear to be required 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

FIGURE 1

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC
2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0599

PROJECT NO.: 0126-018-003

DATE: MARCH 2018

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\2018\Figure 2; Site Plan.dwg, 2/20/2018 3:28:45 PM, DWG To PDF.pc3

SEYMOUR ST

(60' WIDE)

(50' WIDE)

798 SENECA STREET

SENECA ST

LORD ST

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

MILL RACE COMMONS, LLC

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

FMR. 1,500 GAL
WASTE OIL UST
(CLOSED IN-PLACE)

TP-1

SV-2

FMR. 2 x 20,000 GAL
DIESEL USTs
(CLOSED IN-PLACE)

TP-12

TP-9

TP-11

SV-1

TP-10

STORM WATER
VAULT

MW-102R

MW-3

MW-105

MW-103

MW-106

MW-104

MW-301

MW-303

N

60' 0' 60' 120'

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

DATE: MARCH 2018
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)

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC
2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0599

JOB NO.: 0126-018-003

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

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Division of Environmental Remediation
625 Broadway, 11th Floor, Albany, NY 12233-7020
P: (518)402-9543 | F: (518)402-9547
www.dec.ny.gov

2/9/2018

Gary Kriner
Mill Race Commons, LLC
726 Exchange Street, Suite 412
Buffalo, NY 14210

Re: Reminder Notice: Site Management Periodic Review Report and IC/EC Certification Submittal
Site Name: Former American Linen Supply Company Facility
Site No.: C915241
Site Address: 822 Seneca Street
Buffalo, NY 14210

Dear Gary Kriner:

This letter serves as a reminder that sites in active Site Management (SM) require the submittal of a periodic progress report. This report, referred to as the Periodic Review Report (PRR), must document the implementation of, and compliance with, site specific SM requirements. Section 6.3(b) of DER-10 *Technical Guidance for Site Investigation and Remediation* (available online at http://www.dec.ny.gov/regulations/67386.html) provides guidance regarding the information that must be included in the PRR. Further, if the site is comprised of multiple parcels, then you as the Certifying Party must arrange to submit one PRR for all parcels that comprise the site. The PRR must be received by the Department no later than **April 23, 2018**. Guidance on the content of a PRR is enclosed.

Site Management is defined in regulation (6 NYCRR 375-1.2(at)) and in Chapter 6 of DER-10. Depending on when the remedial program for your site was completed, SM may be governed by multiple documents (e.g., Operation, Maintenance, and Monitoring Plan; Soil Management Plan) or one comprehensive Site Management Plan.

A Site Management Plan (SMP) may contain one or all of the following elements, as applicable to the site: a plan to maintain institutional controls and/or engineering controls ("IC/EC Plan"); a plan for monitoring the performance and effectiveness of the selected remedy ("Monitoring Plan"); and/or a plan for the operation and maintenance of the selected remedy ("O&M Plan"). Additionally, the technical requirements for SM are stated in the decision document (e.g., Record of Decision) and, in some cases, the legal agreement directing the remediation of the site (e.g., order on consent, voluntary agreement, etc.).

When you submit the PRR (by the due date above), include the enclosed forms documenting that all SM requirements are being met. The Institutional Controls (ICs) portion of the form (Box 6) must be signed by you or your designated representative. The Engineering Controls (ECs) portion of the form (Box 7) must be signed by a Qualified Environmental Professional (QEP). If you cannot certify that all SM requirements are being met, you must submit a Corrective Measures Work Plan that identifies the actions to be taken to restore compliance. The work plan must include a schedule to be approved by the Department. The Periodic Review process will not be considered complete until all necessary corrective measures are completed and all required controls are certified. Instructions for completing the certifications are enclosed.

All site-related documents and data, including the PRR, are to be submitted in electronic format to the Department of Environmental Conservation. The Department will not approve the PRR unless all documents and data generated in support of that report have been submitted in accordance with the electronic submissions protocol. In addition, the certification forms are required to be submitted in both paper and electronic formats.

Information on the format of the data submissions can be found at:
http://www.dec.ny.gov/regulations/2586.html

The signed certification forms should be sent to David Szymanski, Project Manager, at the following address:

New York State Department of Environmental Conservation
270 Michigan Ave
Buffalo, NY 14203-2915

Phone number: 716-851-7220. E-mail: david.szymanski@dec.ny.gov

The contact information above is also provided so that you may notify the project manager about upcoming inspections, or for any other questions or concerns that may arise in regard to the site.

Enclosures

PRR General Guidance
Certification Form Instructions
Certification Forms

ec: w/ enclosures
David Szymanski, Project Manager
Chad Staniszewski, Hazardous Waste Remediation Engineer, Region 9

Enclosure 1

Certification Instructions

I. Verification of Site Details (Box 1 and Box 2):

Answer the three questions in the Verification of Site Details Section. The Owner and/or Qualified Environmental Professional (QEP) may include handwritten changes and/or other supporting documentation, as necessary.

II. Certification of Institutional Controls/ Engineering Controls (IC/ECs)(Boxes 3, 4, and 5)

1.1.1. Review the listed IC/ECs, confirming that all existing controls are listed, and that all existing controls are still applicable. If there is a control that is no longer applicable the Owner / Remedial Party should petition the Department separately to request approval to remove the control.

2. In Box 5, complete certifications for all Plan components, as applicable, by checking the corresponding checkbox.

3. If you cannot certify "YES" for each Control listed in Box 3 & Box 4, sign and date the form in Box 5. Attach supporting documentation that explains why the **Certification** cannot be rendered, as well as a plan of proposed corrective measures, and an associated schedule for completing the corrective measures. Note that this **Certification** form must be submitted even if an IC or EC cannot be certified; however, the certification process will not be considered complete until corrective action is completed.

If the Department concurs with the explanation, the proposed corrective measures, and the proposed schedule, a letter authorizing the implementation of those corrective measures will be issued by the Department's Project Manager. Once the corrective measures are complete, a new Periodic Review Report (with IC/EC Certification) must be submitted within 45 days to the Department. If the Department has any questions or concerns regarding the PRR and/or completion of the IC/EC Certification, the Project Manager will contact you.

III. IC/EC Certification by Signature (Box 6 and Box 7)**:**

If you certified "YES" for each Control, please complete and sign the IC/EC Certifications page as follows:

- For the Institutional Controls on the use of the property, the certification statement in Box 6 shall be completed and may be made by the property owner or designated representative.

- For the Engineering Controls, the certification statement in Box 7 must be completed by a Professional Engineer or Qualified Environmental Professional, as noted on the 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, 2017 to March 24, 2018

	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?	☐	☑
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

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 Larkin Development Group, 726 Exchange Street, Suite 412, Buffalo, NY 14210 (print business address),

am certifying as Owner's Representative (Owner or Remedial Party)

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

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

4/10/18 — 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 H. Forbes, P.E. at Benchmark Environmental Engineering & Science, PLLC, 2558 Hamburg Tpk, Buffalo, NY 14218,

print name — print business address

am certifying as a Qualified Environmental Professional for the Owner

(Owner or Remedial Party)

STATE OF NEW YORK
THOMAS H. FORBES
070850-1
LICENSED PROFESSIONAL ENGINEER

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

4-3-18
Date

Enclosure 3
Periodic Review Report (PRR) General Guidance

I. Executive Summary: (1/2-page or less)
   A. Provide a brief summary of site, nature and extent of contamination, and remedial history.
   B. Effectiveness of the Remedial Program - Provide overall conclusions regarding;
      1. progress made during the reporting period toward meeting the remedial objectives for the site
      2. the ultimate ability of the remedial program to achieve the remedial objectives for the site.
   C. Compliance
      1. Identify any areas of non-compliance regarding the major elements of the Site Management Plan (SMP, i.e., the Institutional/Engineering Control (IC/EC) Plan, the Monitoring Plan, and the Operation & Maintenance (O&M) Plan).
      2. Propose steps to be taken and a schedule to correct any areas of non-compliance.
   D. Recommendations
      1. recommend whether any changes to the SMP are needed
      2. recommend any changes to the frequency for submittal of PRRs (increase, decrease)
      3. recommend whether the requirements for discontinuing site management have been met.

II. Site Overview (one page or less)
   A. Describe the site location, boundaries (figure), significant features, surrounding area, and the nature and extent of contamination prior to site remediation.
   B. Describe the chronology of the main features of the remedial program for the site, the components of the selected remedy, cleanup goals, site closure criteria, and any significant changes to the selected remedy that have been made since remedy selection.

III. Evaluate Remedy Performance, Effectiveness, and Protectiveness
   Using tables, graphs, charts and bulleted text to the extent practicable, describe the effectiveness of the remedy in achieving the remedial goals for the site. Base findings, recommendations, and conclusions on objective data. Evaluations and should be presented simply and concisely.

IV. IC/EC Plan Compliance Report (if applicable)
   A. IC/EC Requirements and Compliance
      1. Describe each control, its objective, and how performance of the control is evaluated.
      2. Summarize the status of each goal (whether it is fully in place and its effectiveness).
      3. Corrective Measures: describe steps proposed to address any deficiencies in ICECs.
      4. Conclusions and recommendations for changes.
   B. IC/EC Certification
      1. The certification must be complete (even if there are IC/EC deficiencies), and certified by the appropriate party as set forth in a Department-approved certification form(s).

V. Monitoring Plan Compliance Report (if applicable)
   A. Components of the Monitoring Plan (tabular presentations preferred) - Describe the requirements of the monitoring plan by media (i.e., soil, groundwater, sediment, etc.) and by any remedial technologies being used at the site.
   B. Summary of Monitoring Completed During Reporting Period - Describe the monitoring tasks actually completed during this PRR reporting period. Tables and/or figures should be used to show all data.
   C. Comparisons with Remedial Objectives - Compare the results of all monitoring with the remedial objectives for the site. Include trend analyses where possible.
   D. Monitoring Deficiencies - Describe any ways in which monitoring did not fully comply with the monitoring plan.
   E. Conclusions and Recommendations for Changes - Provide overall conclusions regarding the monitoring completed and the resulting evaluations regarding remedial effectiveness.

VI. Operation & Maintenance (O&M) Plan Compliance Report (if applicable)
   A. Components of O&M Plan - Describe the requirements of the O&M plan including required activities, frequencies, recordkeeping, etc.
   B. Summary of O&M Completed During Reporting Period - Describe the O&M tasks actually completed during this PRR reporting period.
   C. Evaluation of Remedial Systems - Based upon the results of the O&M activities completed, evaluated

the ability of each component of the remedy subject to O&M requirements to perform as designed/expected.

D. O&M Deficiencies - Identify any deficiencies in complying with the O&M plan during this PRR reporting period.

E. Conclusions and Recommendations for Improvements - Provide an overall conclusion regarding O&M for the site and identify any suggested improvements requiring changes in the O&M Plan.

VII. Overall PRR Conclusions and Recommendations

A. Compliance with SMP - For each component of the SMP (i.e., IC/EC, monitoring, O&M), summarize;
   1. whether all requirements of each plan were met during the reporting period
   2. any requirements not met
   3. proposed plans and a schedule for coming into full compliance.

B. Performance and Effectiveness of the Remedy - Based upon your evaluation of the components of the SMP, form conclusions about the performance of each component and the ability of the remedy to achieve the remedial objectives for the site.

C. Future PRR Submittals
   1. Recommend, with supporting justification, whether the frequency of the submittal of PRRs should be changed (either increased or decreased).
   2. If the requirements for site closure have been achieved, contact the Departments Project Manager for the site to determine what, if any, additional documentation is needed to support a decision to discontinue site management.

VIII. Additional Guidance

Additional guidance regarding the preparation and submittal of an acceptable PRR can be obtained from the Departments Project Manager for the site.

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	B0126-018-003

Photo No.	Date
1	04/02/18

Direction Photo Taken:
NE

Description:
Asphalt Paved Area (from Southern end)

Photo No.	Date
2	04/02/18

Direction Photo Taken:
N-NW

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	B0126-018-003

Photo No.	Date
3	04/02/18

Direction Photo Taken:
NE

Description:
Asphalt Paved Area (from center)

Photo No.	Date
4	04/02/18

Direction Photo Taken:
SW

Description:
Asphalt Paved Area Adjacent to 798 Seneca

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	B0126-018-003

Photo No.	Date
5	04/02/18

Direction Photo Taken:
NE

Description:
Soil Cover (from SW end)

Photo No.	Date
6	04/02/18

Direction Photo Taken:
NE

Description:
Soil Cover (looking toward Seymour 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	B0126-018-003

Photo No.	Date
7	04/02/18

Direction Photo Taken:
S-SW

Description:
Soil Cover (looking toward intersection of Lord and Seneca St.)

Photo No.	Date
8	04/02/18

Direction Photo Taken:
S-SW

Description:
Soil Cover (looking toward Seneca 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	B0126-018-003

Photo No.	**Date**
9	04/02/18

Direction Photo Taken:
SW

Description:
Soil Cover (looking toward Seneca St.)

Prepared By: *THF*

APPENDIX C

2017 GROUNDWATER MONITORING SUMMARY REPORT

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

28 November 2017
File No. 127836-003

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

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

Subject: 2017 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 2017 Groundwater Monitoring Summary Report summarizing the results from the annual groundwater sampling event conducted in July 2017 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 July 2017 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 2017 was the first year of annual sampling at the Site, following four semi-annual sampling events in 2015 and 2016.

Groundwater Sampling Events and Methodology

Groundwater sampling was performed by Haley & Aldrich for AmeriPride Services, Inc. on 11 July 2017, in accordance with 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 was formerly in the program but was likely destroyed during construction and paving of an adjacent property across Lord Street. The NYSDEC approved removal of well MW-302 from the sampling program on 5 May 2016. Well locations and site features are detailed on the attached site plan, Figure 1.

GROUNDWATER LEVEL READINGS & WELL ASSESSMENT

At the start of the 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 2017 event, which are shown on Figure 2. Groundwater appears to be flowing in a south-southwest direction, which is a slight shift to the west compared to previous events; though still generally consistent with historical data. The integrity of each well was assessed and the wells appeared to be in good condition and well maintenance and/or repairs were not identified based on observations made during the 2017 event.

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 B. 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 27 September 2017.

Purge water from the sampling events was containerized and staged onsite in a 55-gallon steel, open-top drum. A request for “contained-in” determination was submitted to the NYSDEC on 18 August 2017, and a determination was received on 24 August 2017 that the purge water does not have to be managed as hazardous waste. The purge water drum was removed from the Site by NRC Environmental Services on 28 September 2017 and disposed as non-hazardous waste at Covanta Environmental in Niagara Falls, New York. Waste disposal documentation is included in Appendix C.

[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.

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 reporting limits in MW-101 or MW-103 samples. This is generally consistent with previous post-remediation sampling events.

  Target CVOCs were not detected in MW-102R above laboratory reporting limits. VC was detected at an estimated concentration of 0.64 µg/L, which is below the laboratory reporting limit of 1 µg/L. The NYSDEC groundwater standard and comparison criterion for VC is 2 µg/L. The VC concentration has decreased since the previous sampling event in November 2016.

- **Source Wells (MW-105, MW-106):** Concentrations of cis-1,2-DCE (33 µg/L in MW-105) and/or VC (6.2 µg/L in MW-105 and 7.6 µg/L in MW-106) 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. Concentrations of CVOCs in these wells appear to be stable or decreasing as compared to the previous sampling event. Overall trends from these wells are shown on Figure 3.

- **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 2017 sampling event except for PCE in well MW-104. PCE was detected at an estimated concentration of 0.2 µg/L, below the laboratory reporting limit of 0.5 µg/L. The NYSDEC groundwater standard and comparison criterion for TCE is 5 µg/L.

The 2017 results indicate stable or decreased concentrations as compared to pre-remediation results. The results in MW-105 since 2013 may reflect slight seasonal fluctuations, however the overall concentrations of CVOCs in that well as well as in the other source area well MW-106 have appeared to remain consistent or decreasing since 2013. Based on the analytical data, target CVOCs do not appear to be migrating off site.

Based on the current and historical sampling results, we are requesting approval from the NYSDEC to discontinue the groundwater sampling program at the Site. Please confirm if this request is approved prior to the next scheduled sampling event in Summer 2018.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK

Samuel B. Burke
Staff Scientist

Claire L. Mondello, CHMM
Associate | Senior Project Manager

C: AmeriPride Services, Inc.; Attn: Brian Keegan
AmeriPride Services, Inc.; Attn: Theresa Schulz, Esq.
Nixon Peabody LLP; Attn: Scott Turner, Esq.
Mill Race Commons; Attn: Joseph Petrella
Kavinoky Cook LLP; Attn: Deborah Chadsey, Esq.
Haley & Aldrich; Attn: Glenn White

Attachments:
Table I – Summary of Analytical Results Groundwater Wells
Figure 1 – Groundwater Monitoring Well Network
Figure 2 – Groundwater Contour – July 11, 2017
Figure 3 – 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

G:\37319 (AmeriPride, 8 Lord Street, Buffalo)\060 - Site Management\2017 Groundwater Sampling\Annual GW Report\2017_1128_Ameripride GW Summary Report-F.docx

TABLE

TABLE I
SUMMARY OF ANALYTICAL RESULTS
GROUNDWATER WELLS
FORMER AMERICAN LINEN SUPPLY
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	7/11/2017	12/11/2012	12/31/2013	05/05/2015	11/23/2015	5/13/2016	11/21/2016	7/11/2017
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)	ND (2.5)	**220**	**14**	ND (2.5)	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 (0.5)	**5.7**	ND (0.18)	ND (0.5)	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)	ND (0.5)	**20.5**	ND (0.17)	ND (0.5)	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 (1)	**54.9**	**60**	**2.8**	**2.8 J**	ND (1)	**5**	0.64 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).

TABLE I
SUMMARY OF ANALYTICAL RESULTS
GROUNDWATER WELLS
FORMER AMERICAN LINEN SUPPLY
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	7/11/2017	12/13/2012	12/26/2013	05/05/2015	05/05/2015 (Dup)	11/23/2015	5/13/2016	11/21/2016	7/11/2017
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 (2.5)	ND (0.2)	ND (0.7)	ND (2.5)	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 (0.5)	ND (0.12)	ND (0.18)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	0.2 J
Trichloroethene	5	3	2.9	ND (0.7)	ND (0.5)	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)	ND (0.5)
Vinyl chloride	2	**55.8**	**55.1**	ND (1.3)	ND (1)	0.23 J	ND (1)	0.28 J	ND (1)	ND (0.13)	ND (0.33)	ND (1)	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).

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

Location		MW-105						
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	7/11/2017
Sample Depth (bgs)	ug/L	11.5 - 16.5 (ft)						
Volatile Organic Compounds (ug/L)								
cis-1,2-Dichloroethene	5	**99.2 J**	**49**	**37**	**61 J**	**43**	**59**	**33**
Tetrachloroethene	5	**21.5 J**	1	0.49 J	**7.1 J**	1.8	3.3	1
Trichloroethene	5	**14.1 J**	1.3	0.5	4.1 J	1.8	3.9	1.6
Vinyl chloride	2	**4.6 J**	0.54 J	0.41 J	**3.0 J**	**2.8**	**6.6**	**6.2**

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).

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

Location		MW-106										
Sample Date	NYSDEC TOGS 1.1.1 Class GA	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	7/11/2017	7/11/2017 Dup
Sample Depth (bgs)	ug/L	11.1 - 16.1 (ft)										
Volatile Organic Compounds (ug/L)												
cis-1,2-Dichloroethene	5	**160 J**	ND (7)	**11**	**13 J**	**12 J**	**7.9**	**8 J**	4.1	3.4	4.9	4.3
Tetrachloroethene	5	**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)	ND (0.5)	ND (0.5)
Trichloroethene	5	**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)	0.2 J	0.18 J
Vinyl chloride	2	**99.7**	**12**	**17**	**26 J**	**23 J**	**9.2 J**	ND (1)	**6.4**	**5.8**	**8.4**	**7.6**

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).

TABLE I
SUMMARY OF ANALYTICAL RESULTS
GROUNDWATER WELLS
FORMER AMERICAN LINEN SUPPLY
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	7/11/2017	03/27/2013	12/30/2013	05/05/2015	11/23/2015	5/13/2016	11/21/2016	7/11/2017
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 (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	ND (0.12)	ND (0.18)	ND (0.5)	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	4	ND (0.17)	ND (0.5)	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)	ND (0.5)
Vinyl chloride	2	ND (0.13)	ND (0.33)	ND (1)	ND (1)	ND (1)	ND (1)	ND (1)	ND (0.13)	ND (0.33)	ND (1)	ND (1)	ND (1)	0.11 J	ND (1)

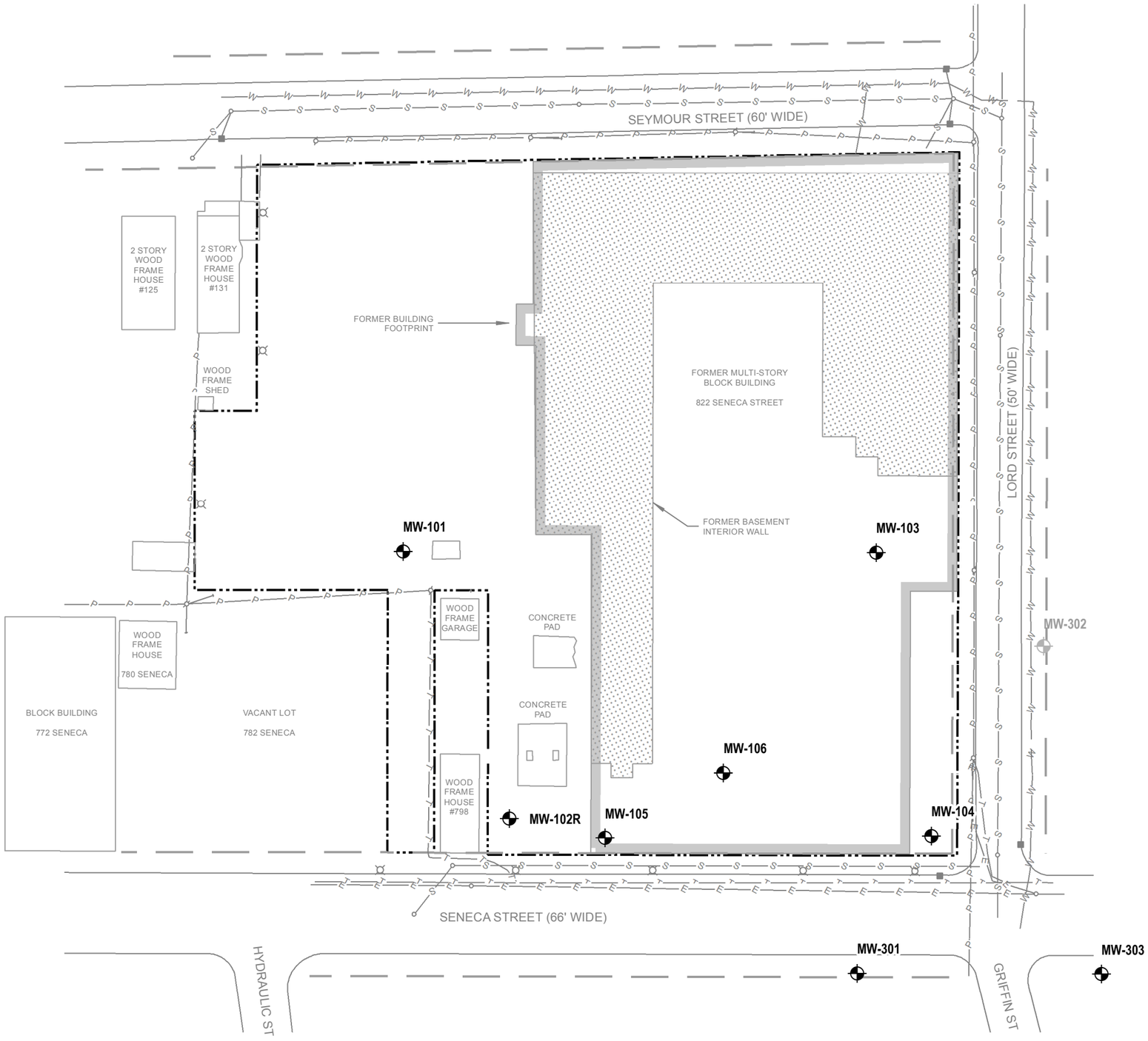
Notes and Abbreviations:

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).

FIGURE



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, 1 JANUARY 2014

N

0 50 100
SCALE IN FEET

HALEY ALDRICH

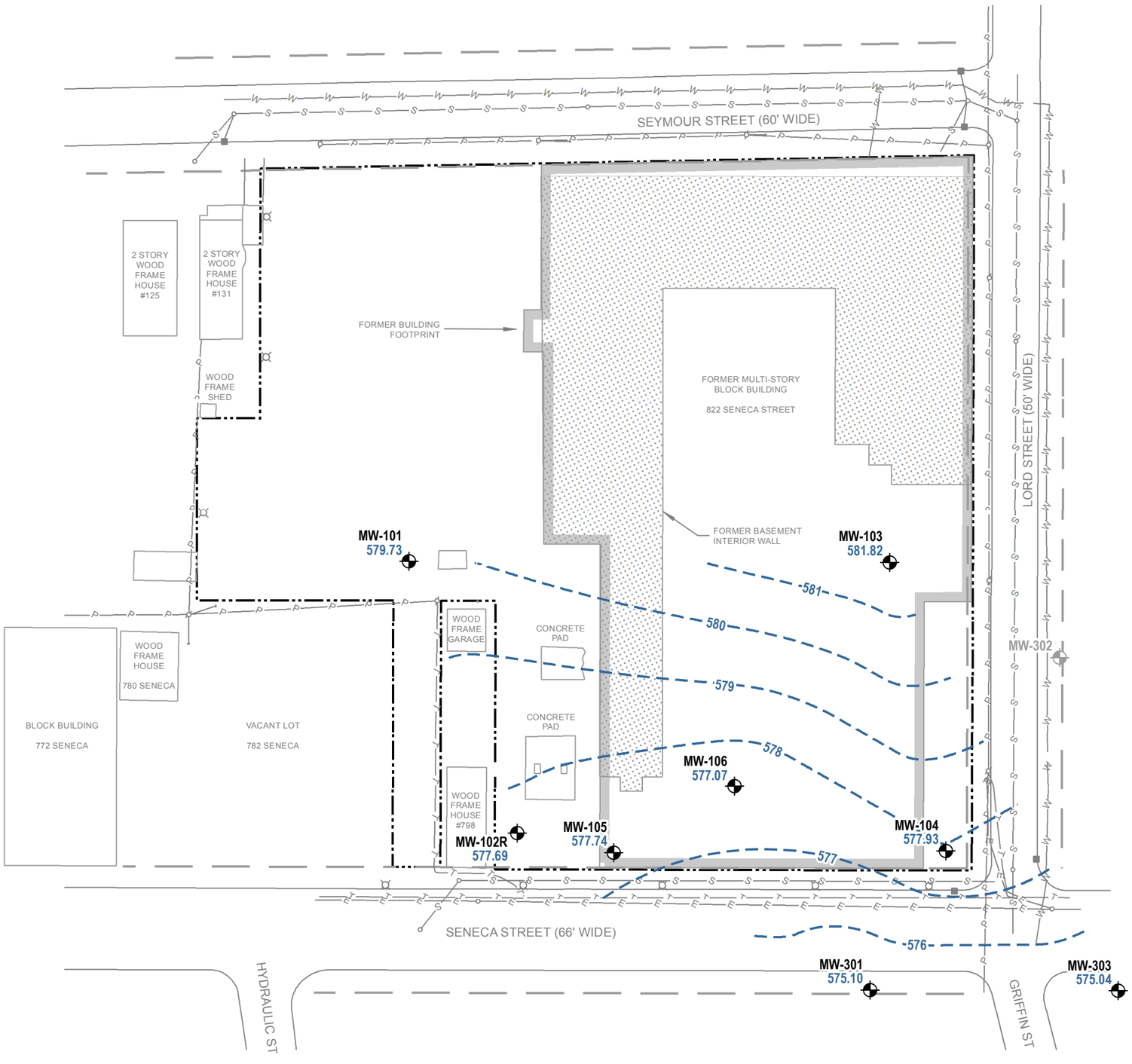
FORMER AMERICAN LINEN SUPPLY COMPANY
822 SENECA STREET
BUFFALO, NEW YORK

GROUNDWATER MONITORING WELL NETWORK

SEPTEMBER 2017

FIGURE 1

GIS FILE PATH: \\haleyaldrich.com\share\roc_common\37319 (AmeriPride, 8 Lord Street, Buffalo)\GIS\Maps\2017_09\1127838_002_00MB_GROUNDWATER_CONTOUR_2017.mxd — USER: anichols — LAST SAVED: 9/28/2017 8:37:28 AM



LEGEND

- MONITORING WELL
- MONITORING WELL - DESTROYED
- GROUNDWATER POTENTIOMETRIC CONTOUR, ELEVATION IN FEET ABOVE MEAN SEA LEVEL (AMSL)
- P — OVERHEAD POWER
- S — SANITARY SEWER
- T — UNDERGROUND TELEPHONE
- E — UNDERGROUND ELECTRIC
- W — UNDERGROUND WATER

NOTES

1. GROUNDWATER DEPTHS MEASURED 11 JULY 2017 BY H&A PERSONNEL.
2. SITE BOUNDARY AND PROPERTY BOUNDARY ARE THE SAME.
3. BASE MAP SOURCE: HOFFMAN LAND SURVEYING, 1 JANUARY 2014

N

0 50 100
SCALE IN FEET

HALEY ALDRICH

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

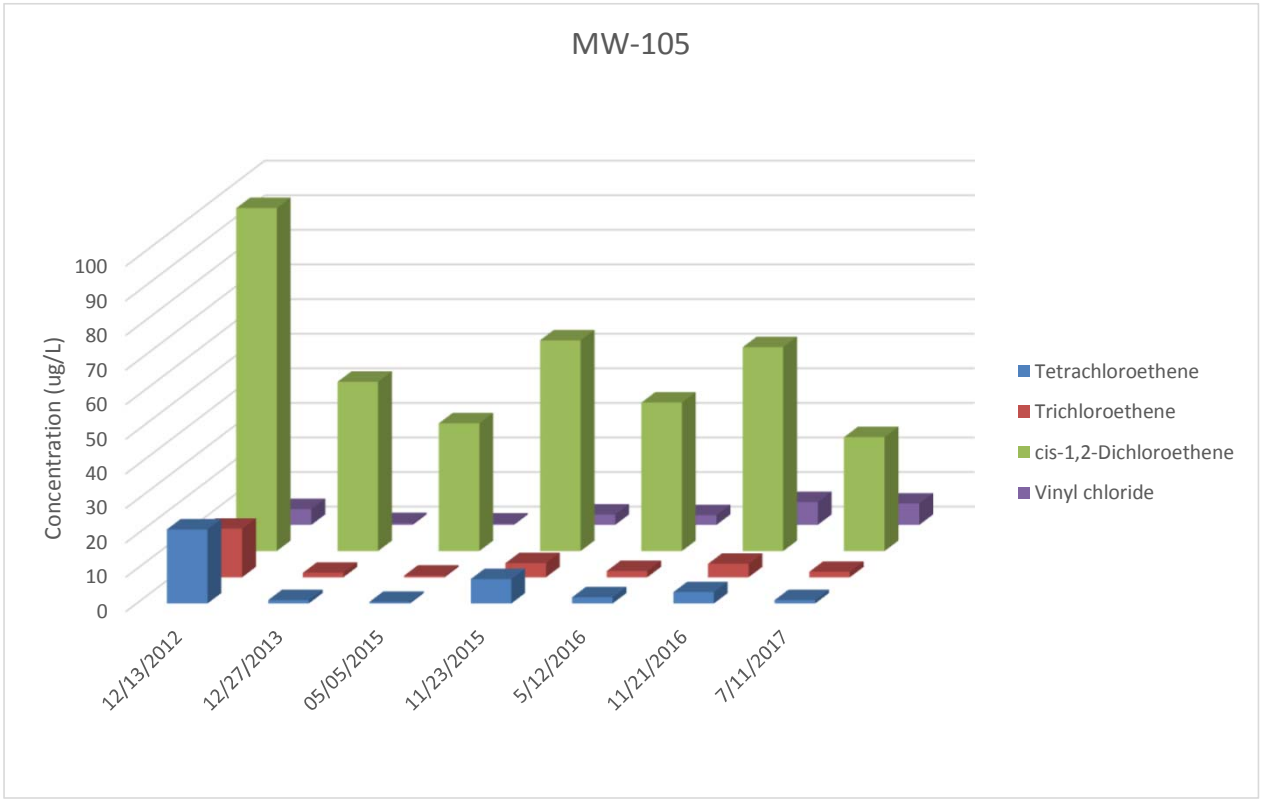
GROUNDWATER CONTOUR - JULY 11, 2017

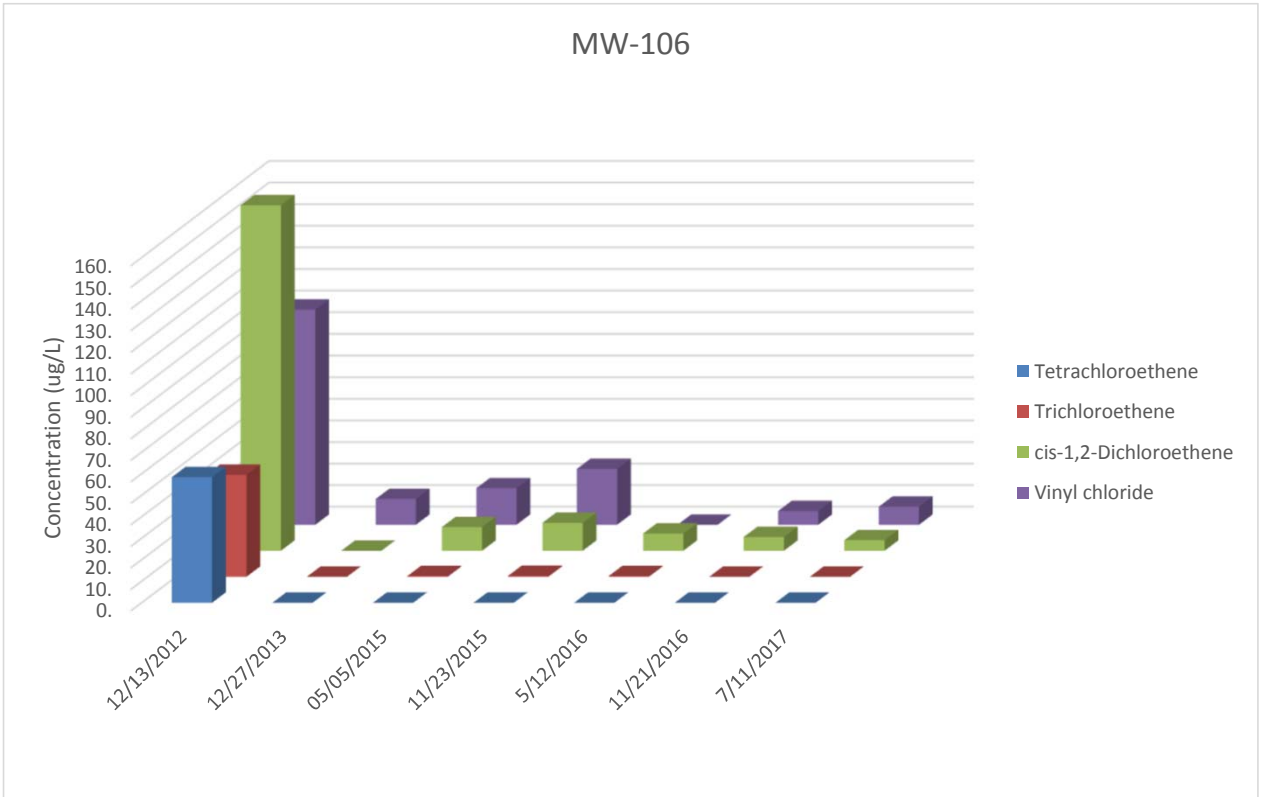
SEPTEMBER 2017

FIGURE 2

GIS FILE PATH: \\haleyaldrich.com\share\roc_common\137319 (AmeriPride, 8 Lord Street, Buffalo)\GIS\Maps\2017_09\127836_002_00\MB_GROUNDWATER_CONTOUR_2017.mxd — USER: anichols — LAST SAVED: 9/28/2017 8:37:28 AM

Figure 3 - Groundwater Concentration Trends (MW-105 and MW-106)





APPENDIX A

Field Forms and Inspection Records

Static Water Levels

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

Date: 7/11/17
Performed By: SBR, JMS
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	5.49	Good	N
MW-102R	585.3	7.61	Good	N
MW-103	586.36	4.54	Good	N
MW-104	585.13	7.20	Good	N
MW-105	584.68	6.94	Good	N
MW-106	584.11	4.35	Good	N
MW-301	582.14	7.04	Good	N
MW-302	581.35	—	Destroyed	—
MW-303	581.79	6.75	Good	N

* - 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.	Claire Mondello
CLIENT		FIELD REP	S Burke
CONTRACTOR		DATE	7/11/17

GROUNDWATER SAMPLING INFORMATION

Well No.	MW-101	MW-102R	MW-103	MW-104	MW-105	MW-106
Water Depth (ft)	5.49	7.61	4.54	7.20	6.94	4.35
Time	0900	0910	0915	0930	0925	0927
Product	N	N	N	N	N	N
Depth Of Well (ft)	17.72	19.73	13.41	9.63	16.00	SB 15.72
Inside Diameter (in)	2	2	2	2	2	2
Standing Water Depth (ft) [1]	12.23	12.12	8.87	2.43	9.06	11.37
Volume Of Water In Well (gal)	1.96	1.94	1.42	0.39	1.45	1.82
Purging Device	Bailer	→	→	→	→	→
Volume of ~~Water~~ Removed ~~Purge Capacity~~	5.9	6.2	4.3	1.2	4.4	5.5
Cleaning Procedure						
Bails Removed/ Volume Removed						
Time Purging Started						
Time Purging Stopped						
Sampling Device						
Cleaning Procedure						
TIME SAMPLES TAKEN — VOCs	1300	1315	1150	1230	1220	1200
		+ 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
LOCATION: 822 Seneca St Buffalo NY
CLIENT:
CONTRACTOR:

H&A FILE NO.: 127836-002
PROJECT MGR.: Claire Mondello
FIELD REP: S Burke
DATE: 7/11/17

GROUNDWATER SAMPLING INFORMATION

Well No.		MW-301	MW-303				
Water Depth (ft)		7.04	6.75				
Time		0950	0955				
Product		N	N				
Depth Of Well (ft)		18.71	16.32				
Inside Diameter (in)		2	2				
Standing Water Depth (ft) [1]		11.67	9.57				
Volume Of Water In Well (gal)		1.87	1.53				
Purging Device		Bailer ← →					
Volume of Bailer/Pump Capacity							
Cleaning Procedure							
Bails Removed/ Volume Removed		5.6	4.6				
Time Purging Started							
Time Purging Stopped							
Sampling Device							
Cleaning Procedure							
TIME SAMPLES TAKEN	VOCs	1115	1130				
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 Reports

HALEY ALDRICH

Data Usability Summary Report (DUSR)
AMERIPRIDE
Analytical Laboratory: Alpha Analytical - Westborough, MA
Sample Delivery Group # 127836-002

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 170711 1300
MW102R 170711 1315
MW103 170711 1150
MW104 170711 1230
MW105 170711 1220
MW106 170711 1200
MW301 170711 1115
MW303 170711 1130
3177 170711 0001
3177 170711 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
- 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.

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.

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. MW106 170711 1200	FD Sample ID. 3177 170711 0001	%RPD	Flag Original and FD sample results with:
Vinyl chloride	7.6	0.07	10.5%	
Trichloroethene	0.18	0.05	10%	
cis-1,2-Dichloroethene	4.3	0.7	13%	

Action:

If the sample matrix is solid and the %RPD is greater than 50%, the original sample results are qualified "J". If the sample matrix is water or air and the %RPD is greater than 35%, the original sample results are qualified "J".

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

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

August 24, 2017

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

Re: 27th 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 L1724091) submitted with your August 18, 2017 request, via e-mail, for a “contained-in” determination for the referenced project.

Water (purge water, well sampling and decon water), collecting during the sampling of monitoring wells in in July 2017, 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 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 MANIFEST

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

Manifest Document No. 83480

2. Page 1 of

3. Generator's Name and Mailing Address
AmeriPride Services, Inc.
650 Industrial Boulevard, NE, Minneapolis, MN 55413

822 Seneca Street
Buffalo NY

4. Generator's Phone ( ) 612-676-8060 Attn: Randy Cook

5. Transporter 1 Company Name
NRC NY Environmental Svcs, Inc.

6. US EPA ID Number
N Y D 9 8 8 9 8 0 7 5 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
Covanta Environmental Solutions LLC
8995 Quarry Rd.
Niagara Falls, NY 14304

10. US EPA ID Number
N / A

E. State Facility's ID

F. Facility's Phone 716-298-5297

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.				

G. Additional Descriptions for Materials Listed Above
a. # OES170118B
c. PO # 118103-01
b. Job # 118103
d.

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

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

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 09 Day 28 Year 17

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name Bob Lloyd | Signature | Date: Month 09 Day 28 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