# Periodic Review Report 2021-2022

1827 Fillmore Avenue Site BCP Site No. C915279 Buffalo, New York

April 2022 B0421-022-001

#### **Prepared For:**

1827 Fillmore, LLC



Prepared By:



# PERIODIC REVIEW REPORT REPORTING PERIOD MARCH 22, 2021 TO MARCH 22, 2022

#### 1827 FILLMORE AVENUE SITE BCP SITE No. C915279 BUFFALO, NEW YORK

April 2022 B0421-022-001

Prepared for:

1827 Fillmore, LLC

424 Main Street, Suite 2000 Buffalo, NY 14202

Prepared by:



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

#### PERIODIC REVIEW REPORT

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#### 1.0 Introduction

Benchmark Civil/Environmental Engineering & Geology, PLLC (Benchmark) has prepared this Periodic Review Report (PRR) on behalf of 1827 Fillmore LLC to summarize the post-remedial status of New York State Department of Environmental Conservation (NYSDEC or the Department) Brownfield Cleanup Program (BCP) Site No. C915279 located in the City of Buffalo, Erie County, New York (see Figure 1).

This PRR has been prepared in accordance with NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation (Ref. 1) and is based on the information contained within the November 2019 Site Management Plan (SMP; Ref. 2). Appendix A includes the Institutional and Engineering Control (IC/EC) Certification Form completed based on the Site inspection performed March 18, 2022.

This PRR and associated certifications have been completed to document post-remedial activities at the Site for the March 22, 2021 to March 22, 2022 PRR reporting period.

#### 1.1 Site Background

The Site is located at 1827 Fillmore Avenue in Erie County, City of Buffalo, New York and identified as SBL No. 90.13-1-11 (hereinafter referred to as the "Site"). The 17.11-acre Site is bound by the Kensington Expressway (Route 33) to the north; Buffalo Public School #89, Dr. Lydia T. Wright School of Excellence and athletic fields to the south; Erie County Medical Center (ECMC) and Buffalo Public School #84 to the east; and Fillmore Avenue to the west (see Figure 2).

The Site is primarily vegetated with one asphalt road along the southern boundary. The eastern portion of the Site is currently used by ECMC as a parking area constructed in 2019 as part of the final cover system. The Site was used as a stone quarry from at least 1917 through at least 1927. Sometime between the 1940s and 1950s, the stone quarry was backfilled with unknown fill materials. The Kensington Heights Towers Apartments were constructed in 1958. The seven-story Kensington Heights Towers Apartments was demolished in October 2018 and five similar buildings that were also a part of the Kensington Heights Towers Apartments were demolished circa 2012. The Site has been



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vacant since the 1980s. Historic operations impacted on-site soil with polycyclic aromatic hydrocarbons (PAHs) and lead.

#### 1.2 Remedial History

1827 Fillmore LLC entered into a Brownfield Cleanup Agreement (BCA), Index #C915279-10-17, with the NYSDEC in November 2017 to investigate and remediate the 17.11-acre Site located in the City of Buffalo, Eric County, New York. Upon entry into the BCP, Benchmark completed a Remedial Investigation (RI) in accordance with the approved RI Work Plan dated November 2017 (Ref. 3) and three approved supplemental Work Plans including February 2018 Supplemental Remedial Investigation Work Plan (Ref. 4), April 2018 Emerging Contaminants Groundwater Sampling Work Plan (Ref. 5), and June 2018 Supplemental Remedial Investigation Work Plan for Bedrock Drilling Activities (Ref. 6). RI and Supplemental RI activities were performed November to December 2017, July 2018, and May 2018. On-site field activities included soil boring advancement; test pit excavations (across the Site and within two soil/fill mounds); surface soil/fill sampling; overburden and bedrock monitoring well installation; and groundwater quality sample collection. Based on the findings of the RI, Benchmark prepared and completed the January 2019 Remedial Investigation/Alternatives Analysis (RI/AA) Report (Ref. 7) and May 2019 Remedial Action Work Plan (Ref. 8).

The final remedial measures included in-situ stabilization, excavation of soil/fill exceeding Part 375 commercial soil cleanup objectives (CSCOs), and placement of acceptable cover material in areas not otherwise covered by asphalt roadway or pavement as detailed in the November 2019 SMP (Ref. 2) and December 2019 Final Engineering Report (FER; Ref. 9). BCP site activities were performed in accordance with the BCA and the property was remediated to a NYSDEC Part 375 Commercial Use Track 4 cleanup.

#### 1.3 Compliance

At the time of the annual Site inspection (March 18, 2022), the Site was fully compliant with the NYSDEC-approved SMP (Ref. 2). Minor areas of sparse vegetation were noted during the Site inspection, likely caused by cool temperatures and lack of precipitation.

The only post-remedial activity performed during this PRR reporting period included:



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Pick up of approximately 1,000 pounds (two 55-gallon drums) of non-hazardous soil on May 13, 2021 by Chemtron Corporation for transportation to and disposal at the EQ Detroit, Inc. facility in Detroit, MI. These soil cuttings were generated during installation of monitoring wells MW-5R, MW-9, and MW-10 in July 2020. Appendix B includes the non-hazardous waste manifest.



#### 2.0 SITE OVERVIEW

Previous environmental investigations completed identified contamination from past uses of the Site that required remediation. 1827 Fillmore LLC entered the BCP to further investigate and remediate the Site for future redevelopment. The remedial activities completed in 2019 included:

- In-situ stabilization of approximately 3,091 cubic yards of characteristic hazardous lead soil/fill using Portland cement in remedial areas SB-21 and TP-13.
- Excavation and off-site disposal of contaminant source areas, including soil exceeding the site-specific action levels (SSALs) of 3,900 ppm for lead and total PAHs exceeding 500 ppm. Approximately 2,200 tons of soil was removed and disposed off-site; this amount includes approximately 160 tons of soil exceeding the 6NYCRR Part 371 hazardous toxicity characteristic for lead in remedial area SB-21, which was treated in-situ and rendered non-hazardous prior to disposal.
- Construction of a soil cover system consisting of a minimum of one foot of soil placed over a demarcation layer, with the upper six inches of soil of sufficient quality to maintain a vegetative layer to prevent human exposure to remaining contaminated soil/fill remaining at the Site.

The remedial program was successful in achieving the remedial objectives for the Site. An Environmental Easement restricting end use of the Site and enforcing adherence to the SMP was executed by the Department on July 26, 2019 and filed with the Erie County Clerk on September 6, 2019. The FER was approved in December 2019. Concurrently, the Site received a Certificate of Completion (COC) from NYSDEC on December 23, 2019.



#### 3.0 REMEDY PERFORMANCE

A post-remedial site inspection involving a walk-over of the Site was performed by Mr. Richard Dubisz on March 18, 2022 (under the direction of Ms. Lori Riker, P.E. of Benchmark) to visually observe and document Site conditions for commercial use, confirm absence of Site groundwater use, and verify conformance with other requirements under the SMP. The Site inspection confirmed that the controls are in-place and functioning as intended in accordance with the SMP. Minor areas of sparse vegetation were noted during the Site inspection, likely due to lack of precipitation and cool temperatures.

Appendix A includes the completed IC/EC Certification form. Appendix C includes photographs taken during the March 18, 2022 Site inspection.



#### 4.0 SITE MANAGEMENT PLAN

A Site-wide SMP was prepared for the Site and approved by the Department in November 2019. Key components of the SMP are described below.

#### 4.1 Institutional and Engineering Control (IC/EC) Plan

Since soil/fill containing constituents above CSCOs and residual groundwater impacts exist beneath the Site, institutional and engineering controls (IC/ECs) are required to protect public health and the environment. The IC/EC Plan describes the procedures for the implementation and management of all IC/ECs at the Site.

#### 4.1.1 Institutional Controls

The Site has a series of Institutional Controls (ICs) in the form of site restrictions. Adherence to these ICs is required by the Environmental Easement. Site restrictions that apply to the Controlled Property are:

- Allows the use and development of the controlled property for commercial uses as defined by Part 375-1.8(g), although land use us subject to local zoning laws.
- Requires compliance with the Department-approved SMP.
- Restricts the use of groundwater underlying the Site as a source of potable water, without necessary water quality treatment as determined by the NYS Department of Health (NYSDOH) or the Erie County DOH.
- Data and information pertinent to site management must be reported at the frequency and in a manner as defined in this SMP.
- All future activities that will disturb remaining contaminated material must be conducted in accordance with this SMP.
- Operation, maintenance, monitoring, inspection, and reporting of any physical component of the remedy shall be performed as defined in this SMP.
- 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 Environmental
  Easement.
- Vegetable gardens and farming on the Site are prohibited.



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

#### 4.1.2 Engineering Controls

A cover system has been installed at the Site to prevent exposure to remaining soil/fill contamination above CSCOs. The cover system is comprised of the following (see Figure 3):

- Vegetated Soil Cover most of the Site is covered by a vegetated soil cover system. The vegetated soil cover consists of a minimum of 12 inches of DER-10 compliant soil placed over a demarcation layer, with the upper six inches of soil of sufficient quality to maintain a vegetative layer to prevent human exposure to contaminated soil/fill remaining at the Site.
- Asphalt Paved Road the existing and repaired asphalt roadway along the southern property boundary.
- Asphalt Parking Lot the area associated with the new ECMC asphalt parking lot expansion project on the eastern portion of the Site. The cover system in this area consists of asphalt pavement and sub-base underlain by geotextile fabric. Appendix D of the SMP provides construction drawings, prepared by others, for the new parking area.

#### 4.2 Excavation Work Plan

An Excavation Work Plan (EWP) was included in the approved SMP for the Site. The EWP provides guidelines for the management of soil/fill during any future intrusive actives. Any intrusive work that may disturb remaining contamination during maintenance or redevelopment work on the Site must be performed in compliance with the EWP and must also be conducted in accordance with a site-specific Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP) meeting the minimum requirements of the sample HASP and CAMP included with the SMP.

#### 4.3 Annual Inspection and Certification Program

The Annual Inspection and Certification Program outlines requirements for certifying and attesting that the IC/ECs employed on the Site are unchanged from the original design and/or previous certification. The Annual Certification includes a Site inspection and

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completion of the NYSDEC's IC/EC Certification Form. The Site inspection is intended to verify that the IC/ECs:

- Are in place and effective.
- Are performing as designed.
- That nothing has occurred that would impair the ability of the controls to protect the public health and environment.
- That nothing has occurred that would constitute a violation or failure to comply with any operation and maintenance plan for such controls.
- Access is available to the Site to evaluate continued maintenance of such controls.

Formal inspection of the Site was conducted on March 18, 2022 by Mr. Dubisz who was under the supervision of Ms. Lori Riker, P.E. of Benchmark. Ms. Riker meets the requirements of a Qualified Environmental Professional (QEP) per 6NYCRR Part 375-1.2. At the time of the inspection, the Site was fully compliant with the NYSDEC-approved SMP. Minor areas of sparse vegetation were observed during the inspection, likely caused by dry cool weather. No observable indication of intrusive activities or observable use of groundwater were noted during the Site inspection. Benchmark observed all intrusive activities that occurred during the reporting period to verify compliance with the NYSDECapproved SMP.

Appendix A includes the completed Site Management Periodic Review Report Notice - Institutional and Engineering Controls Certification Form. Appendix C provides a photographic log of the monitoring well installation and conditions at the time of the Site inspection.

#### 4.4 Operation, Monitoring and Maintenance Plan

The Site remedy does not rely on any mechanical systems (e.g., sub-slab depressurization systems, groundwater pump and treat, or 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.



#### 5.0 GROUNDWATER MONITORING

The SMP requires annual groundwater monitoring and is subject to evaluation and recommendations after year 1, as noted on Table 11 of the SMP. The 2021 PRR recommended discontinuance of groundwater monitoring at the Site following the October 2020 post-remedial monitoring event since all dissolved lead concentrations were reported as non-detect or well below the NYSDEC Class GA groundwater quality standard (GWQS). The NYSDEC's June 23, 2021 PRR acceptance letter stated that groundwater sampling cessation will be re-assessed following one additional sampling round in October 2023.



#### 6.0 CONCLUSIONS AND RECOMMENDATIONS

#### 6.1 Conclusions

The Site complied with the SMP at the time of the March 18, 2022 inspection. Minor areas of sparse vegetation were noted likely caused by dry cool weather.

#### 6.2 Recommendations

The following modifications are recommended for the Site:

• Overseeding and watering sparsely vegetated areas.

No other modifications are recommended at this time.



#### 7.0 DECLARATION/LIMITATION

This PRR has been prepared for the exclusive use of 1827 Fillmore LLC. The contents of this PRR are limited to information available at the time of the Site inspection. The findings herein may be relied upon only at the discretion of 1827 Fillmore LLC. Use of or reliance upon this PRR or its findings by any other person or entity is prohibited without written permission of Benchmark Civil/Environmental Engineering & Geology, PLLC.



#### 8.0 REFERENCES

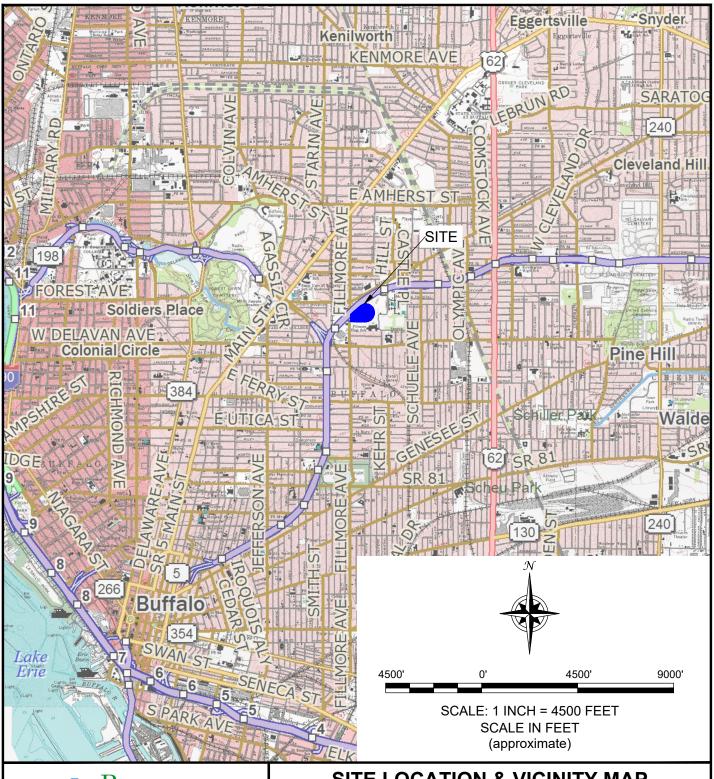
- 1. New York State Department of Environmental Conservation. DER-10/Technical Guidance for Site Investigation and Remediation. May 2013.
- 2. Benchmark Environmental Engineering and Science, PLLC. Site Management Plan, 1827 Fillmore Avenue Site, Buffalo, New York. November 2019
- 3. Benchmark Environmental Engineering and Science, PLLC. Remedial Investigation Work Plan, 1827 Fillmore Avenue Site, Buffalo, New York. November 2017.
- 4. Benchmark Environmental Engineering and Science, PLLC. Supplemental Remedial Investigation Work Plan, 1827 Fillmore Avenue Site, Buffalo, New York. February 2018.
- 5. Benchmark Environmental Engineering and Science, PLLC. Emerging Contaminants Groundwater Sampling Work Plan, 1827 Fillmore Avenue Site, Buffalo, New York. April 2018.
- 6. Benchmark Environmental Engineering and Science, PLLC. Supplemental Remedial Investigation Work Plan for Bedrock Drilling Activities, 1827 Fillmore Avenue Site, Buffalo, New York. June 2018.
- 7. Benchmark Environmental Engineering and Science, PLLC. Remedial Investigation/Alternative Analysis Report, 1827 Fillmore Avenue Site, Buffalo, New York. January 2019.
- 8. Benchmark Environmental Engineering and Science, PLLC. Remedial Action Work Plan, 1827 Fillmore Avenue Site, Buffalo, New York. May 2019.
- 9. Benchmark Environmental Engineering and Science, PLLC. Final Engineering Report, 1827 Fillmore Avenue Site, Buffalo, New York. December 2019.



## **FIGURES**



#### FIGURE 1





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

PROJECT NO.: 0421-022-001

DATE: APRIL 2022 DRAFTED BY: CCB

#### SITE LOCATION & VICINITY MAP

PERIODIC REVIEW REPORT

1827 FILLMORE AVENUE SITE BCP SITE NO. C915279 BUFFALO, NEW YORK

PREPARED FOR

1827 FILLMORE LLC

DISCLAIMER:
PROPERTY OF BENCHMARK CIVIL/ENVIRONMENTAL ENGINEERING & GEOLOGY, PLLC. IMPORTANT: THIS DRAWING PRINT IS LOANED FOR MUTUAL ASSISTANCE AND AS SUCH IS SUBJECT
TO RECALL AT ANY TIME. INFORMATION CONTAINED HEREON IS NOT TO BE DISCLOSED OR REPRODUCED IN ANY FORM FOR THE BENEFIT OF PARTIES OTHER THAN NECESSARY
SUBCONTRACTORS & SUPPLIERS WITHOUT THE WRITTEN CONSENT OF BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC.

PROPERTY BOUNDARY

PARCEL BOUNDARY

**FENCE** 

SCALE: 1 INCH = 150 FEET SCALE IN FEET (approximate)



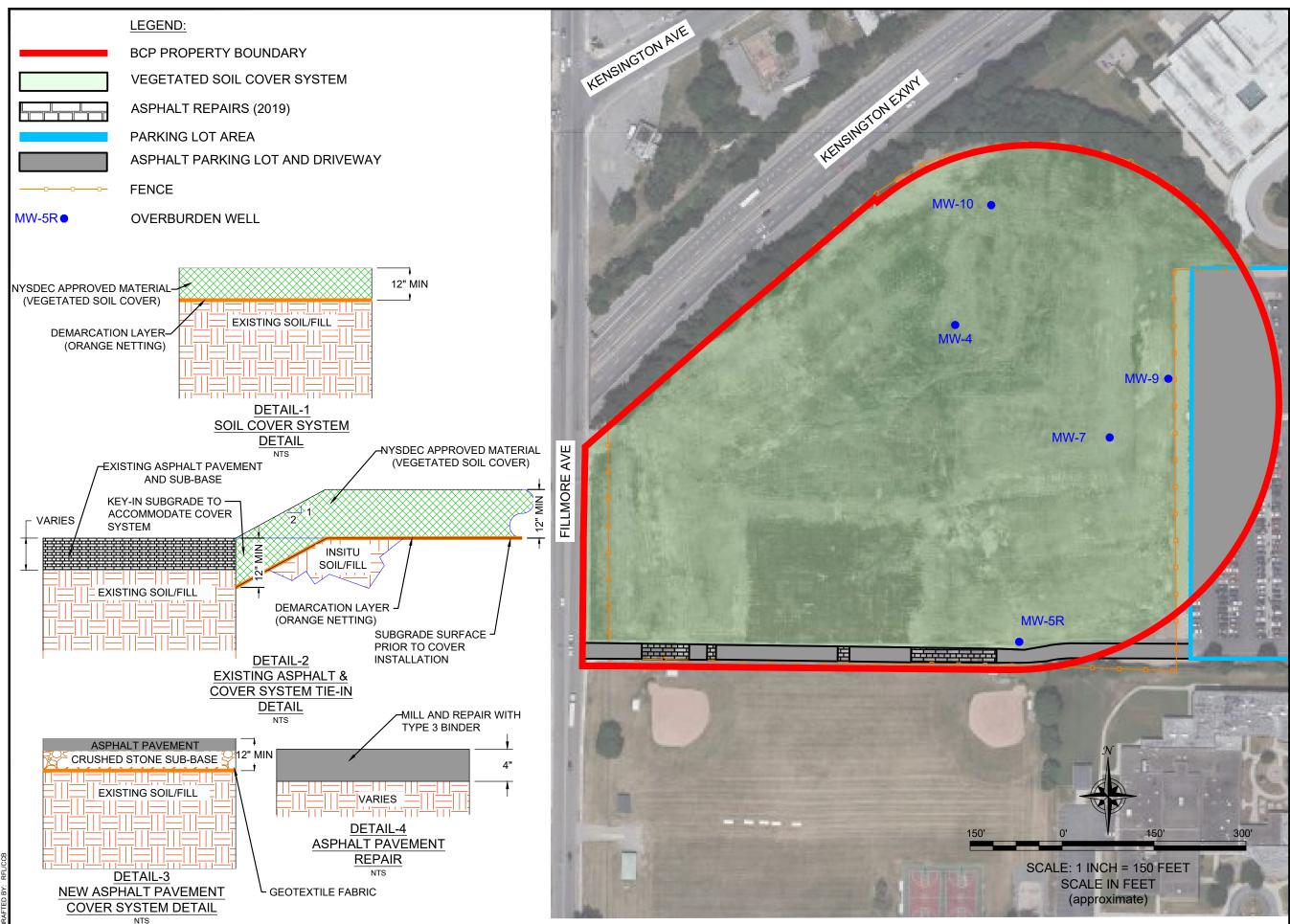
# SITE PLAN (AERIAL)

**BENCHMARK** 

PERIODIC REVIEW REPORT

JOB NO.: 0421-022-001

FIGURE 2



# DETAIL YOUT SYSTEM COVER

**SENCHMARK** 

1827 FILLMORE AVENUE SITE BCP SITE NO. C915279 BUFFALO, NEW YORK PERIODIC REVIEW REPOR

FIGURE 3

0421-022-00

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JOB

### **APPENDIX A**

# INSTITUTIONAL & ENGINEERING CONTROLS CERTIFICATION FORM





# Enclosure 2 NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION Site Management Periodic Review Report Notice Institutional and Engineering Controls Certification Form



Sit	e No.	C915279	Site Details		Box 1		
Sit	e Name 18	27 Fillmore Avenue					
City Co	e Address: y/Town: Bu unty:Erie e Acreage:		Zip Code: 14214				
Re	porting Perio	od: March 22, 2021 to M	arch 22, 2022				
					YES	NO	
1.	Is the infor	mation above correct?			$\checkmark$		
	If NO, inclu	ide handwritten above or	on a separate sheet.				
2.		or all of the site property nendment during this Rep	been sold, subdivided, merged, or un porting Period?	ndergone a		$\checkmark$	
3.		peen any change of use a RR 375-1.11(d))?	at the site during this Reporting Peric	od		$\checkmark$	
4.	•	ederal, state, and/or loca e property during this Rep	l permits (e.g., building, discharge) borting Period?	een issued		$\checkmark$	
	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 of	currently undergoing deve	elopment?			$\checkmark$	
					Box 2		
					YES	NO	
6.		ent site use consistent wit al and Industrial	h the use(s) listed below?		$\checkmark$		
7.	Are all ICs	in place and functioning	as designed?	$\checkmark$			
	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.							
 Sig	nature of Ow	ner, Remedial Party or De	esignated Representative	Date			

				Box 2A					
				YES NO					
8.	Has any new information reveale Assessment regarding offsite cor								
	If you answered YES to question that documentation has been p								
9.	<ol> <li>Are the assumptions in the Qualitative Exposure Assessment still valid?</li> <li>(The Qualitative Exposure Assessment must be certified every five years)</li> </ol>								
	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. C915279			Box 3					
ı	Description of Institutional Cont	rols							
arce	•		Institutional Contro	ol					
<b>90.13-1-11</b> 1827 Fillm		nore, LLC		_					
			Ground Water Use Soil Management Landuse Restriction Monitoring Plan Site Management IC/EC Plan	Plan on					
site	use must be maintained as comme	ercial or industrial;							
- com	nibition against groundwater use wat piliance with an excavation work pual-groundwater monitoring								
				Box 4					
	Description of Engineering Con	trole							
<u>Parce</u> <b>90.13</b>	="	Engineering Control							
		Cover System							
	and pavement site cover system; a tu stabilized soil/fill								

Box	5
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	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 Engineering Control certification;				
	<ul> <li>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.</li> <li>YES NO</li> </ul>				
2.	For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:				
	(a) The 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 the environment;					
	<ul><li>(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;</li></ul>				
	(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. C915279

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.

, Jonathan Swiatkowski	1827 Fillmore LLC 462 Grider Street, Buffalo, NY 14215							
1 Johannah Swiatkowski	_ at,							
print name	print business address							
am certifying as Owner	(Owner or Remedial Party)							
for the Site named in the Site Details Section of this form.  Signature of Owner, Remedial Party, or Designated Representative  (Owner or Remedial Party)  4/19/2 Z  Date								

#### **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.

Lori E. Riker, P.E.

print name

Benchmark Civil/Environmental Engineering & Geology, PLLC 2558 Hamburg Turnpike, Buffalo, NY 14218

print business address

am certifying as a Qualified Environmental Professional for the

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

(Required for PE)

## APPENDIX B

**DISPOSAL DOCUMENTATION** 



P	ease p orm de	rint or type signed for use on elite (12	2-pitch) typewriter.)										
1		NON-HAZARDOUS WASTE MANIFEST	1. Generator ID Number			3. Emergency Respons		4. Waste T					
4		Generator's Name and Mail	CESQG ing Address		1	716-474-7510 Generator's Site Addres		than mailing addr		20210			
	TurnKey Environmental Restoration, LLC 2559 Hamburg Turnpike, Suite 300 Buffalo NY 14218 Generality Phone: 716 856-0599							The I making society					
	6.1	Fransporter 1 Company Nar	me					U.S. EPA ID Number					
	باا	Chemtron Corp	poration					OHD066060609					
	7. Transporter 2 Company Name							U.S. EPA ID Number					
	B. Designated Facility Name and Site Address     EQ Detroit, Inc.     1923 Frederick Street     Detroit MI 49211							U.S. EPA ID Number					
	Fac	cility's Phone: 313 9	23-0080			10. Conta	ainers	M I D 9 8 0 9 9 1 5 6			3 0	0	
	Ш	9. Waste Shipping Name	e and Description			No.	Туре	Quantity	Wt./Vol.				
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	14. 0	BENERATOR'S/OFFEROR	'S CERTIFICATION: I hereby de led, and are in all respects in pro	eclare that the contents of this	consignment ar cording to applic	e fully and accurately desi able international and nati	evods bedita inevog lanoi	by the proper shi mental regulations	ipping nam s.	e, and are classific	id, package	ed,	
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## **APPENDIX C**

SITE PHOTO LOG



#### **SITE PHOTOGRAPHS**

#### Photo 1:



Photo 3:



Photo 2:



Photo 4:



Annual Site Inspection (March 18, 2022)

Photo 1: Asphalt and vegetated soil cover (looking north).

Photo 2: Asphalt and vegetated soil cover (looking west).

Photo 3: View of cover and monitoring well MW-7 (looking northwest).

Photo 4: Vegetated soil cover (looking southwest).

#### **SITE PHOTOGRAPHS**

Photo 5:



Photo 7:



Photo 6:



Photo 8:



Photo 5: View of cover and monitoring well MW-10 (looking southeast).

Photo 6: Asphalt cover along the southern property boundary (looking west)

Photo 7: Vegetated soil cover along the western property boundary (looking north).

Asphalt and vegetated soil cover (looking northeast). Photo 8:



#### **SITE PHOTOGRAPHS**

Photo 9:



Photo 11:



Photo 10:



Photo 12:



Photo 9: Vegetated soil cover along the northern property boundary (looking northeast).

- Photo 10: Vegetated soil cover (looking southeast).
- Photo 11: Vegetated soil cover (looking northwest from center of Site).
- Photo 12: Vegetated soil cover (looking southwest from center of Site).

