

# HAZARD EVALUATIONS

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December 31, 2014

Mr. Jack Karet  
President  
Keystone Corporation  
2929 Main Street  
Buffalo, NY 14214

Re: Phase I Environmental Site Assessment  
Keystone Corporation, 2929 and 2939 Main Street, Buffalo, NY  
Project No. e1405

Dear Mr. Karet:

Please find attached one electronic copy of the final report for a Phase I Environmental Site Assessment (ESA) completed on the above-referenced site. This Phase I ESA was completed in accordance with our agreement signed on November 14, 2014. The attached report, as noted therein, has been prepared in general accordance with the ASTM Standard E1527-13.

Information accumulated for this assessment will be retained with your project file. The report and information in your file is considered confidential and will not be released without your written authorization.

If you have any questions concerning the information presented in this report, please contact me directly. Thank you for the opportunity to provide these site assessment services.

Very truly yours  
HAZARD EVALUATIONS, INC.

  
Michele M Wittman, P.G.  
Director of Site Services

  
C. Mark Hanna, CHMM  
President

Attachments

## PHASE I ENVIRONMENTAL SITE ASSESSMENT



**Keystone Corporation**  
2929 and 2939 Main Street  
Buffalo, NY 14214

Prepared For:  
**Keystone Corporation**  
2929 Main Street, Buffalo, NY  
HEI Project No: e1405

Prepared By:  
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(716) 667-3130



Michele Wittman, P.G.  
Director of Site Services



C. Mark Hanna, CHMM  
President

December 31, 2014

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## PHASE I ENVIRONMENTAL SITE ASSESSMENT

**Keystone Corporation  
2929 and 2939 Main Street  
Buffalo, New York**

### **EXECUTIVE SUMMARY**

In accordance with the executed agreement, dated November 14, 2014, Hazard Evaluations, Inc. (HEI) completed a Phase I Environmental Site Assessment (ESA) of the above-referenced property (hereinafter “subject site”) for Keystone Corporation (hereinafter “Client”). This ESA includes figures in Appendix A, completed user/client and owner questionnaires in Appendix B, site inspection photographs in Appendix C, regulatory databases in Appendix D, freedom of information letters and local government inquiries in Appendix E, report objectives and limitations in Appendix F, professional qualifications in Appendix G, environmental professional(s) statement in Appendix H and references in Appendix I.

The subject site is located at 2929 and 2939 Main Street in the City of Buffalo, Erie County, New York and includes two parcels, as listed below:

- Parcel 1 – addressed as 2929 Main Street and identified as SBL # 79.70-5-1, including 0.54 acres of land occupied by two buildings; an office building (Building 1) and a rental warehouse building (Building 2).
- Parcel 2 – addressed as 2939 Main Street and identified as SBL #79.70-5-2, including 3.88 acres of land occupied by two buildings; the main manufacturing building (Building 3) and processing/storage building (Building 4).

The subject site is located on the south side of Main Street near the southwest intersection of Main Street and Hertel Avenue. According to information obtained from the Erie County Assessor's Office<sup>1</sup>, the subject site includes two parcels currently owned by Keystone Corporation. Site boundaries and significant site features are illustrated in Figure 2. The subject site is currently used as an electroplating facility, offices, storage and rental building for storage.

A summary of most probable site history indicates that the subject site was partially used as a quarry prior to 1900s and originally developed around 1909-1910 as Automotive Transportation Company (mfr of electric trucks). Buildings 1, 2, 4, and portions of Building 3 were constructed between 1909 to 1916. Building 3 was expanded through the 1910s to 1920s. The site buildings were occupied by several previous industries, including Martin Schwartz Inc. (mfr of gasoline pumps), Plews Puffed Products, Corp (cereal mfrs), Wright Company (dairy equipment mfrs), Old Dutch Foods, Inc., McDougall Butler Co., Inc. (paint mfrs), and National Finishing Corp (plating). Historical site occupants also included an automotive repair facility along the

southern property border and various office operations including SUNYAB Campus Mail, Hospice Buffalo, Main Hertel Counseling Services, Campfire Girls of Buffalo, Friendship Social Club and Environmental Education Associates

HEI has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM practice E 1527-05 of the subject site located at 2929 Main Street, Buffalo, Erie County, New York. Several data gaps were identified that could have significantly affected HEI's ability to identify recognized environmental conditions associated with the subject site, as described below. Any exceptions to or deletions from this practice are described in Appendix F (Objectives and Limitations) of this report.

This assessment has revealed no evidence of recognized environmental conditionPs in connection with the subject site, except for the following:

- The subject property has included various manufacturing or electroplating operations since construction in 1910. Past operations have utilized various hazardous substances and petroleum products during routine operation. Historical storage and disposal practices for currently regulated substances are not known. Additionally, current and past registrations as a large quantity generator of hazardous waste confirms historical use of hazardous materials and generation of hazardous wastes at the subject site. A previous Phase II assessment performed in 1990 confirmed petroleum and metals impacts within subject site soil. Although limited impacted areas were reportedly remediated, including the removal of petroleum and lead-laden contaminated soils, documentation and confirmation of soil analytical testing was not provided. A potential remains both that releases have impacted the soil profile and/or groundwater at the subject site, and for petroleum and lead impacted areas to be present.
- Several former buildings were located on the subject site and included a tin shop and automotive repair building with boiler room. Past operations of these facilities would have included various petroleum products and hazardous materials. Historical storage, transportation and disposal methods are not know. Potential releases from the past operations may have impacted soil and/or groundwater at the subject site.
- Four USTs were located in the current the courtyard/transformer area in Building 3; one UST was located north of Building 2; and closed-in-place UST was located under the building floor in the wastewater treatment area. Historical records identified four USTs installed at 2933 Main (former site address) as well as construction of a pump house in 1927. Additionally, two ASTs were previously located north of Building 4 on the northern property limit. Petroleum impacts were noted in the surface soil samples near the two ASTS during the 1990 Phase II. No information was provided or identified regarding the closure of the USTs.

Potential release from the former tanks may have impacted the soil profile and/or groundwater at the subject site.

- Several pipes, possibly vent or supply pipes, were observed protruding from the ground and building in the area of a former oil pump house. The purpose of the oil pump house and nature of these pipes is unknown. Previous Phase II investigation identified petroleum impacts in the surface soil collected near the pump house. Potential release from the pump house and/or pipes may have impacted soil profile and/or groundwater at the subject site.
- A railroad spur is located on the south and eastern portion of the subject site. Semi-volatile organic compounds and metals are historically associated with ballasts associated with railroad lines. During historical use of the railroad spur it is possible that petroleum products and/or hazardous materials were shipped/transported along the rail. The potential exists for spills and/or releases to have impacted the soil profile and/or groundwater at the subject site.
- Various general debris/refuse as well evidence of mounding and filling was observed in the eastern and southeastern areas of the subject site. Observed debris included brick (pieces and former walls), concrete, rusted/empty 55-gallon drums, 5-gallon pails, roofing shingles, tires, and wood. The known fill material and previous drum contents, if any, pose a potential for release to the subject site soil profile and/or groundwater.
- Three transformers were present in the courtyard area of Building 3, as well as three transformers located on the roof of Building 4. It is unknown if the transformers contain PCBs. Potential releases from the transformer oil may have resulted in impacts in the vicinity of the transformers.
- Various pits and trenches are associated with the current electroplating operations and are used to contain and transport waste liquids to the wastewater pretreatment system. The integrity of the pits could not be inspected due to the various tanks and process lines present. Potential cracks in the pits or trenches may result in leakage of waste liquids to the soil profile and/or groundwater.
- A pit/sump was observed in the southeast corner of Building 3. The pit was reportedly associated with a former vapor degreaser that utilized trichloroethene (TCE). Previous reports indicated the floor of the sump has signs of cracking. Potential releases to the sump may have results in soil, groundwater, or vapor intrusion impacts at the subject site.
- The precious metals room, located on the second floor in Building 3, has a wood floor with extensive buildup of residue from general dripping during routine operations. Based on the operations performed in this room, the residues built up on the floor would likely be considered a hazardous waste. Cleanup and

disposal of this material would likely require handling and disposal in accordance with appropriate NYSDEC regulations.

- An adjacent property, Monro Muffler, addressed at 2955 Main Street, was identified as a current and historical automotive repair facility with several previous tanks associated with operations. Although this property is in an estimated down gradient direction from the subject site, potential releases from the tanks may have migrated to the subject site.

In this context, HEI recommends that a subfloor and subsurface investigation be completed on the subject site to assess if the soil profile and/or groundwater have been impacted by historical site operations. Additionally, due to the usage of various solvents and petroleum products at the subject site, a vapor intrusion survey should also be completed to assess possible vapors within the slab and indoor air.

This assessment has revealed no evidence of controlled recognized environmental conditions in connection with the subject site, except for the following:

- An adjacent property, Monro Muffler, addressed at 2915 Main Street, was listed as spill #0910964 when contamination was found during a soil boring investigation. The information was provided to NYSDEC; however, no further work was required and the spill was given an “inactive” status due to site conditions. The “inactive” status means that residual contamination remains on the property, although no further work is required by the regulatory agency.

This assessment has revealed no evidence of historical recognized environmental conditions, except for the following:

- The subject site was identified as having Spill Nos. 8602203, 9201458 and 9203981 for historical spills. In each case, the spill was addressed to the regulatory requirements and a closed/meets standards status was issued. No further work was required.

HEI does note the following de minimis matters which, although not rising to the level of recognized environmental conditions, present limited liability and should be considered by the Client:

- Numerous holding tanks are used throughout the electroplating process located on the first and second floors of Building 3. In general, the tanks appeared to be in fair to good condition. However, evidence of drippage and spillage was apparent throughout the electroplating areas. The spillage is typically collected in trench drains/sumps/pits which discharge to the on-site wastewater pretreatment system. Tank integrity should be evaluated and tanks should be replaced if necessary. Effort should be made to eliminate process drippage and spillage.

- One approximate 30-gallon open top container containing a known oil was present in Building 4. The contents should be properly disposed.
- Green stained wood was observed in Building 4. It appears that the green staining originates from waste liquids generated in the precious metals room, would likely be considered hazardous waste, and should thereby be properly cleaned with any residues being managed as hazardous wastes.
- The various fill and debris piles throughout the wooded areas on the southeastern portion of the building should be properly disposed.
- Secondary containment was not observed in the area of the drums throughout the facility, nor near the wastewater treatment facility. Best management practices would indicate the implementation of secondary containment.
- Hazardous waste generated as filter cake from the wastewater pretreatment system is stored near the filter press. However, one bag of the waste was observed in Building 4. The hazardous waste storage area should be defined and appropriately labeled.
- Hazardous waste drums of concentrated chromic acid were stored near the chromium plating line. This waste is mixed in a mixing tank with sodium metabisulphite to change the valence state of the chromium before it is processed in wastewater pretreatment system. Spillage was apparent in the area. The mixing tank should be retrofitted with secondary containment to control releases of this hazardous liquid.
- Various drums of unknown contents and gallon-size bottles covered in white residue, as well as several plastic bags labeled as “Danger – Contains Asbestos Fibers” were observed in the basement of Building 2. These materials should be properly classified and disposed.
- Oil staining was observed on the concrete floor in the wastewater pretreatment room near the filter press, which has an apparent oil leak. The equipment should be properly repaired to prevent additional leakage.
- Green staining within pooled liquid on the first floor in the eastern portion of Building 3 (within Room 2) indicates the presence of chromium and suggests this residue is a hazardous waste. Appropriate actions should be taken to both clean up such staining and prevent future spillage from the second floor from seeping through the wood floors on to the first floor.

Finally, HEI notes the following non-scope considerations which, although addressed as additional issues under the ASTM E1527-13 Standard, present limited liability and should be considered by the Client:

- A variety of suspected asbestos containing materials were observed throughout the subject buildings, including but not limited to, pipe insulation floor tiles, transite wallboard, and ceiling tiles. Additionally, an asbestos survey completed in 2006 identified ACM within Building 3, including floor tile and mastic, linoleum, pipe insulation, boiler insulation, fire door insulation, window caulk/glazing, roofing materials and elevator break pads. Additional ACMs may be present in Buildings 1, 2 and 4 which were not included within the survey report. Due to the condition of these materials, it is recommended that surveys of suspect asbestos-containing materials be completed and any necessary abatement be conducted at the subject site prior to any demolition or renovation.
- Due to the age of the buildings, it is possible that lead paint was used in the original construction. Extensive areas of peeling paint were observed on the walls and ceilings throughout the subject buildings. HEI recommends that samples be analyzed for lead by an accredited laboratory. Should the presence of lead be confirmed, repair and removal of these materials should be conducted according to state regulations prior to any demolition or renovation.
- Water damaged ceilings were noted in Buildings 2 and 3 and pooled water was observed in certain areas. The water damage can promote mold growth. The roof and leaks should be appropriately repaired to prevent further water intrusion from occurring.

**HAZARD EVALUATIONS, INC.**  
**PHASE I ENVIRONMENTAL SITE ASSESSMENT SUMMARY**

SUBJECT SITE	CLIENT
Keystone Corporation 2929 and 2939 Main Buffalo, NY HEI Reference #: e1405	Keystone Corporation 2929 Main Street Buffalo, NY

	LEVEL OF LIABILITY AND/OR CONCERN				CONCLUSIONS		ADDITIONAL COMMENTS
	High	Mod.	Low	None	Further Investigation Recommended	Reference Report Section(s):	
<b>ASTM E-1527-13 Issues</b>							
Hazardous Substance Usage/Storage	X				X	6.3.3	Related to storage, usage, releases
Petroleum Products Usage/Storage	X				X	6.2.2	Related to storage, usage, releases
Storage Tanks	X				X	5.0; 6.3.3; 6.3.5	Related to historic tanks; storage
Drums & Containers	X				X	6.3.3; 6.3.6	Management required
PCB Usage		X			X	6.3.7	Related to possible spills
Stains, Corrosion, Strained Vegetation	X				X	6.3.8	Related to spills and staining
Fill/Solid Waste Disposal		X			X	6.2.6	Related to historic dumping and filling
Wastewater			X			6.3.10	Related to storage, usage, releases
Wells				X			
Sewage Disposal Systems				X			
Drains & Sumps	X				X	6.3.11	Related to spills, stains and discharges
Pits, Ponds & Lagoons				X			
Pools of Liquids	X				X	6.3.13	Related to spills, stains and discharges
Odors			X			6.3.12	

	LEVEL OF LIABILITY AND/OR CONCERN				CONCLUSIONS		ADDITIONAL COMMENTS  (If Applicable)
	High	Mod.	Low	None	Further Investigation Recommended	Reference Report Section(s):	
<b>Additional (non-scope) Issues</b>							
Asbestos-Containing Materials			X			6.4.1	Survey recommended
Radon				X			
Lead-based Paint			X			6.4.2	Survey recommended
Lead in Drinking Water				X			
Wetlands				X			
Potential Impact from Off-Site Facility(ies)				X			
Other:							
Other: _____							
Other: _____							

# PHASE I ENVIRONMENTAL SITE ASSESSMENT

**Keystone Corporation  
2929 and 2939 Main Street  
Buffalo, New York**

## 1.0 INTRODUCTION

In accordance with the executed agreement, dated November 14, 2014, Hazard Evaluations, Inc. (HEI) completed a Phase I Environmental Site Assessment (ESA) of the above-referenced property (hereinafter "subject site") for Keystone Corporation (hereinafter "Client"). This ESA includes figures in Appendix A, completed user/client and owner questionnaires in Appendix B, site inspection photographs in Appendix C, regulatory databases in Appendix D, freedom of information letters and local government inquiries in Appendix E, report objectives and limitations in Appendix F, professional qualifications in Appendix G, environmental professional(s) statement in Appendix H and references in Appendix I.

This report is an instrument of service of HEI and reflects the use of limited research, a review of specified and reasonably ascertainable listings, and a site reconnaissance upon which to base the identification of "recognized environmental conditions" in conformance with the American Society for Testing and Materials (ASTM) Standard E 1527-05. However, this ESA may also reflect additional or reduced service enhancements requested or authorized by the Client. "Recognized environmental conditions" are defined under the ASTM standard as "the presence or likely presence of any hazardous substances or petroleum products on a site under conditions that indicate an existing release, a past release, or a material threat of release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater or surface water of the property." This ESA was completed by HEI in accordance with generally accepted practices of the profession undertaken in similar studies within the same time frame and geographic area, and HEI observed that degree of care and skill generally exercised by the profession under similar circumstances and conditions.

This ESA and report have been prepared on behalf of, and for the exclusive use of, HEI's Client solely for its reliance in the environmental assessment of this site. The Client is the only party to which HEI has explained the risks involved and which has been involved in shaping of the scope of services needed to satisfactorily manage those risks, if any, from HEI's Client's point of view. Accordingly, reliance on this report by any other party may involve assumptions whose extent and nature lead to a distorted meaning and impact of the findings and opinions related herein. HEI's findings and opinions related in this report may not be relied upon by any party except HEI's Client.

## 2.0 SUBJECT SITE DESCRIPTION

### 2.1 Location and Current Use

The subject site is located at 2929 and 2939 Main Street in the City of Buffalo, Erie County, New York and includes two parcels (Refer to Figure 1 presented in Appendix A), as listed below:

- Parcel 1 – addressed as 2929 Main Street and identified as SBL # 79.70-5-1, including 0.54 acres of land occupied by two buildings; an office building (Building 1) and a rental warehouse building (Building 2).
- Parcel 2 – addressed as 2939 Main Street and identified as SBL #79.70-5-2, including 3.88 acres of land occupied by two buildings; the main manufacturing building (Building 3) and processing/storage building (Building 4).

The subject site is located on the south side of Main Street near the southwest intersection of Main Street and Hertel Avenue. According to information obtained from the Erie County Assessor's Office<sup>1</sup>, the subject site includes two parcels currently owned by Keystone Corporation. Site boundaries and significant site features are illustrated in Figure 2. The subject site is currently used as an electroplating facility, offices, storage and rental building for storage.

### 2.2 Site and Area Features

The subject site is improved with four buildings and includes the following:

**Building 1 (Office Building):** Two-story, approximate 4,300 square foot structure with a block exterior and a flat roof and includes a partial basement area. This building is utilized as office space and occupied by Keystone Corporation.

**Building 2 (Rental Building):** Two-story, approximate 15,900 square foot structure with a brick exterior and a flat roof and includes a partial basement. A portion of the building is used for storage by The Display Company (Christmas and novelty decorations). The remaining areas are vacant and formerly used as offices and warehouse space most recently occupied by Hospice of Buffalo, Friendship Club (servicing adults with special needs) and Environmental Education Associates (offices used for environmental training such as asbestos training).

**Building 3 (Main Building):** Two to three-story building, approximate 50,700 square foot structure with a brick exterior and a flat roof. This structure is occupied by Keystone Corporation and includes electroplating operations throughout the first floor and limited areas on the second floor. The wastewater treatment system and storage areas are also located on the first floor. Offices, quality control laboratory, and storage are present on the second floor. The partial third floor of the building was historically used for electroplating operations but currently used for storage for miscellaneous old parts and general debris. Building room locations identified by Keystone representatives are shown on Figures 3 (first floor) and 4 (second floor).

**Building 4:** One-story approximate 9,300 square foot structure with a brick and block exterior and a flat roof. This structure is currently used for storage of incoming parts and materials and completed product. Historically, the structure included sand blasting activities and includes a former pit.

- Year Built:** - Based on historical information reviewed, Buildings 1, 2, parts of 3 and 4 were constructed in the early 1900s (possibly 1909), with additions to Building 3 in the 1950s.
- Location:** - Building 1: located on the west portion of the subject site  
 Building 2: located on the southwest portion of the subject site  
 Buildings 3 and 4: located on the north portion of the subject site  
 Building 5: located on the central subject site
- Size:** - Building 1: 4,312 square feet  
 Building 2: 15,900 square feet  
 Building 3: 50,718 square feet  
 Building 4: 9,330 square feet
- Construction:** - Generally, block/brick exteriors with flat roofs; Building 4 has concrete walls and ceiling.
- Notable Interior Features:** - Specific interior features are included in Section 6.30.
- Additional Site Features:** The exterior portions of the site consist of paved/gravel parking and drive areas, as well as a vacant, wooded area to the east. Exterior features are included in Section 6.20.

**2.3 Adjoining and Near-by Properties**

The properties surrounding the subject site are currently developed as follows:

- North Monroe Muffler Brake, Crisis Services Center (2969 Main), Veterans Health Administration (northeast) (2963 Main)
- South Bethune Loft Apartments (2915 Main), vacant land
- East William Price Parkway Homes, McCarthy Park
- West Main Street/Illos Piano Restoration (2938 Main), residence, florist (2924 Main) and Elbers Garden Center (2918 Main)

**2.4 Topography and Surface Water Drainage**

The USGS 7.5 minute Topographic Quadrangle Map of Buffalo NE, New York<sup>2</sup> indicates that the subject site's ground surface slopes gradually to the northwest. The nearest natural body of water is Scajaquada Creek, located approximately two miles southwest of the subject site. Additionally, a pond, possibly man-made, is located approximately 0.35 miles to the southeast. During the site walkover, there were no

surface water bodies observed on the subject site. The surface elevation for the subject site generally ranges from 650 to 640 feet above mean sea level.

## **2.5 Utilities**

Based on conversations with the current site occupant and field observations, the subject site is serviced with utilities as follows: 1) Municipal drinking water and sanitary sewerage by the City of Buffalo; 2) Electricity from National Grid; and 3) Natural gas from National Fuel. Utilities appear to be underground with the exception of electric which is overhead.

## **3.0 USER PROVIDED INFORMATION**

### **3.1 Background**

In accordance with the ASTM Standard, information must be obtained from both the current owners and/or occupants of the subject site, as well as the user of this Phase I ESA. According to Mr. Karet, the subject property has been used as an electroplating and/or anodizing facility since 1965 and was historically used as a paint manufacturing facility. Limited on-site soil remediation was completed in 1991. No other concerns were identified within the questionnaire.

## **4.0 HYDROGEOLOGIC CONDITIONS**

### **4.1 Soil Conditions**

According to soils data obtained from by the USDA Soil Conservation Service<sup>3</sup>, the soil beneath the subject site is classified as Urban Land (Ud) and Urban land-Wassaic (Ux).

- Urban land is generally covered by asphalt, concrete, buildings and other impervious structures. It includes parking lots, shopping and business centers, and industrial parks. These areas are generally level to gently sloping.
- Urban land – Wassaic complex is considered to be well-drained and is derived mainly from limestone with varying amounts of sandstone, shale, and crystalline rock.

Based on a review of the New York Hydric Soils List<sup>4</sup> and the Erie County Soils with Potential Hydric Inclusions List<sup>5</sup>, neither of these soils is identified as hydric (wetland). A review of the available wetlands maps<sup>6</sup> for this area indicated state or federal regulated wetlands are not located on the subject site or adjoining properties. According to the available FEMA floodplain maps for this area<sup>6</sup> indicated that the subject site is not located within a 100-year flood zone.

## **4.2 Site Geology**

According to the Geologic Map of New York State<sup>7</sup>, the soils in the area of the subject site are lacustrine silt and clay, deposited in proglacial lakes, generally calcareous with the potential for land instability. The bedrock in the area of the subject site is identified as Onondaga and Bois Blanc Limestones, consisting primarily of Seneca, Morehouse (cherty), and Clarence Limestone members, with Edgecliff cherty limestone members, which are described as sandy, thin, and discontinuous. Bedrock outcrops were not observed on the subject site.

## **4.3 Regional Groundwater Conditions**

Based on a review of the site topographic conditions as depicted on the USGS 7.5 minute Topographic Quadrangle Map of Buffalo, NE, New York<sup>2</sup>, shallow regional groundwater flows is expected to flow in an east to northeasterly direction, toward the Niagara River located approximately four miles east. HEI has assumed that the groundwater table typically conforms to surface and bedrock topography. Localized groundwater flow may vary as a result of underground utilities, site features, or other subsurface conditions.

# **5.0 HISTORICAL INFORMATION**

## **5.1 Review of Aerial Photographs**

Aerial photographs obtained through various on-line sources<sup>8</sup> were reviewed by HEI. It should be noted that HEI reviewed aerial photographs from 1938, 1958, 1966, 1978, 1990, and 2009. The results of the aerial photograph review are summarized below. HEI's evaluation of aerial photographs was limited by photographic scale and quality.

1927, 1938

The subject site was developed with the four existing buildings of similar configuration to the existing buildings. Two additional buildings were present to the north and southwest of Building 4 near the southern property limit. A railroad spur was apparent in the easterly portion of the site extending to railroad lines located east of the subject site.

The surrounding area was heavily developed with commercial and industrial properties to the north and south, and residential/commercial to the west. Additionally, railroad tracks were apparent to the east, beyond which was an undeveloped area that appeared stripped of vegetation.

1951, 1958,  
1966, 1978

The subject site generally appeared similar to the previous maps, with the four site buildings present, as well as the building near the southern property limit. The building to the north of Building 4 was no longer present. The railroad spur was present in the eastern portion of the subject site.

Surrounding properties generally appeared similar to the previous photograph. Baseball diamonds and a park were present southeast of the subject site in the 1978 aerial.

1990, 1995 The subject site generally appeared similar to the previous aerial; however, the railroad spur was not apparent.

Surrounding properties remained heavily developed; however the northern properties appeared to be commercial and the eastern area was wooded and included a park.

2002, 2005,  
2006 The subject site generally appeared similar to the previous aerial photograph. The railroad tracks adjoining the property were no longer present and the area was developed as residential.

2009, 2014 The subject site generally appeared similar to previous aerial. However, the building along the southern property limit was no longer present, but the concrete pad remained. Surrounding properties generally appeared similar to the previous aerial.

## 5.2 Municipal Directories

Polk Directories for the area of the subject site, provided by EDR, were reviewed by HEI<sup>9</sup>. The subject addresses of 2929 and 2939 Main Street were identified in directories dated 1930 to 2013. Additionally, HEI reviewed historical site addresses of 2933 and 2935 Main Street. No listings were identified for site address of 2939 Main Street. The following occupants were identified on the subject site:

1930	Automatic Transportation
1935	Martin and Schwartz Inc. (pump manufacturers), Automatic Transportation Company (industrial trucks), Walker Vehicle Company, Buffalo Equipment Sales Company (regulators), Plews Puffed Products Corporation
1940	Wright R G Company Inc. (dairy equipment manufacturers), Service Station Maintenance Corporation (pump manufacturers), Old Dutch Foods Inc.
1946	Old Dutch Foods Inc. (2933 Main Street), Automatic Transportation Company (electric trucks), Yale and Towne Manufacturing Company (electric pumps)
1950	Vacant (2933 and 2935 Main Street)
1955-1964	McDougall-Butler Company paint manufacturers, Huggins (auto repair)
1970	Dentek Inc. Dental Lab, McDougall-Butler Company, National Finishing Corporation warehouse, and Regional Medical Program for Western New York, Huggins WM J (auto repair)
1975	National Finishing Corporation (platers), Program Inc., Regional Lakes Area Medical, SUNYAB Campus Mail (department and warehouse)

- 1980 Hospice Buffalo Inc. (health services), Main Hertel Counseling Services, National Finishing Corporation (platers)
- 1985 Campfire Girls of Buffalo and Erie, Center for Senior Enrichment, County Inc., mental health agency, Hospice Buffalo Inc., National Finishing Corporation (platers), Transitional Service Inc.
- 1992 Ace Employment Services, Campfire Council of Buffalo and County Inc., Friendship Social Club (mental health agency), Hospice Buffalo Inc., Key Tech Finishing Inc. (metal finishing)
- 2001 Environmental Education Associates, Key Tech Finishing and Keystone (electroplating)
- 2008-2013 Keystone Corporation (plating)

**5.3 Fire Insurance Maps**

Sanborn Fire Insurance Maps<sup>10</sup> (Sanborn maps) of the subject site, dated 1916, 1935, 1950, and 1986 were provided to HEI by EDR. These maps show that the subject site was developed with the on-site buildings since at least 1916. The following was identified on the provided maps:

- 1916 The subject site was occupied by The Automatic Transportation Company and included nine buildings, including office building (Building 1), machine shop (Building 2), machine shop (portion of Building 3) and a fourth machine shop (Building 4). Additional buildings included three stock houses, an unlabeled building, and a woodwork/paint shop building. A railroad spur is located in the eastern portion of the subject site and extends easterly toward railroad lines. A 20,000-gallon elevated water tank was shown in Building 3. Heat was identified as steam.

Adjoining properties were shown as Buffalo Veneer Co. to the north, Buffalo Meter Co. Water & Oil Meters to the south, and commercial/residential properties to the west. Railroad tracks were shown to the east.

- 1935 The subject property was occupied by nine buildings. Plews Puffed Products (cereal factory) was located in the southern portion of the subject site and including an office building (Building 1) and cereal factory (Building 2). Additional buildings associated with Plews Puffed Products included two storage buildings and building labeled as “stalls”. One gas tank was located north of Building 2, along with a scale.

Martin-Schwartz Inc. (utilized for the manufacturing of gasoline pumps) occupied the northern portion of the subject site and included the main building (Building 3) used for welding, press room, paint spraying, storage and shipping, and boiler room (identified as built in 1918); storage building (Building 4 – identified as building 1916), tin shop, and “stalls” building. One room within Building 3 was listed as “fuel oil” and four gas tanks were shown within a courtyard area, near the fuel oil and testing rooms. Heat

was identified as steam with coal as fuel. An oil pump house was located on the southeastern portion of the subject site. A railroad spur was located on the southeast portion of the property.

Adjoining properties included a gasoline station with two gas tanks to the north, Smith & Sons Corp (mfrs of wire hair pins) to the north with a gasoline tank on-site; Bettinger Coal & Coke Corporation to the northeast; railroad tracks to the east, and Buffalo Meter Co with a fuel oil tank to the south. Western adjoining properties included a dry cleaning facility, commercial facility with three gas tanks and various commercial/residential properties.

1950 The subject property was occupied by McDougall-Butler Company Inc. (paint manufacturers). Subject site buildings included an office (Building 1), warehouse, maintenance shop, and printing facility (Building 2), and two factory buildings (Buildings 3 and 4). Fuel was listed as "fuel oil". Additional site features included one 4,700 gallon fuel oil tank, one oil pump house in the southeastern portion of the subject site, and an automotive repair garage along the southern property limit. The five gasoline tanks identified on the previous Sanborn map were not shown on the 1950 map.

The adjacent properties were generally similar to the previous map. However, the dry cleaner to the west was no longer present.

1986 Five buildings are shown at the subject site including office building (Building 1) occupied by Mental Health Services, Friendship Social Club (Building 2), factory building (Building 3) occupied by National Finishing Corp and McDougall-Butler Paint Company (Building 4), listed as "varnish building". The site also includes an oil pump house in the southeastern portion, and 4,700-gallon fuel oil tank north of Building 4, and building along the southern property limit with a boiler room.

Adjacent property to the north was vacant land, commercial building (in location of previous gasoline station), and property to the south was occupied by SUNYAB Department of Art Bethune Hall. A fuel oil tank was present on the southern adjoining property. Railroad tracks were shown to the east and residential/commercial properties to the west.

#### **5.4 Site History Interviews**

Interviews with persons familiar with the site are completed to obtain information pertinent to the environmental evaluation of the site. Mr. Karet escorted HEI representative during the Site reconnaissance and provided information, which is discussed and referenced in the text of this report.

## 5.5 Prior Site Investigation/Remediation Records

HEI reviewed the following previous reports:

“Preliminary Environmental Assessment Phase II Report for Marlette National Corporation, 2929 Main Street, Buffalo, New York,” prepared by Hazard Evaluations, Inc. for Marlette National Company and Keystone Corporation, dated February 9, 1990.

- The purpose of the Phase II investigation was to identify on-site conditions which may have resulted from historical and existing operations. Soil samples were obtained from nine test trenches as well as three surface soil locations. Select soil samples were analyzed for total petroleum hydrocarbons (TPH), organic chemical analysis, total cyanide, total nickel, total copper or toxicity characteristic leaching procedure (TCLP) metals.
- Historical information indicated that the southern portion of the subject site was reportedly quarried for building stone. During the early to mid-1900s, the facility was used by a paint manufacturing firm, which produced lead-based paints. Both National Finishing and Marlette National operated as electroplating facilities plating both common and precious metals. Operations also involved the use of volatile organic compounds for parts degreasing operations and various organic solvents for painting operations.
- HEI noted a vapor degreaser located over an in-floor sump in the south corner of the main building. The floor of the sump was noted to have some apparent signs of cracking. Additionally, contamination was noted on the floors and process equipment in the precious metals room.
- A fuel oil underground storage tank (UST) was formerly located under the current wastewater treatment building, and reportedly removed “several years ago”. The excavation was reportedly cleaned and inspected by the City of Buffalo Fire Control Bureau.
- Subsurface conditions encountered in the test trenches generally included fill materials consisting of brick and other demolition debris overlying naturally occurring silt loam. Bedrock was generally encountered two to four feet below ground surface, except where quarry operations were formerly completed.
- Analytical test results identified cyanide at test trenches 1, 6 and 7, as well as high lead levels at test trenches 5 and 7. TPH levels were also encountered at several locations, including under the two aboveground storage tanks (ASTs) in the vicinity of the former oil house, and test trenches 1, 5, 6, 7 at concentrations which would require remediation.

- HEI provided the additional recommendations:
  - The general refuse be collected and disposed appropriately;
  - Process chemical residues on the facility floors and appurtenances, and general refuse, equipment, drummed process chemicals, and accumulated hazards waste would represent liabilities in the event cleanup-activities are not completed;
  - Sump under the vapor degreaser should be further investigated;
  - Potential for PCBs contamination of facility surfaces related to historical spills of contaminated oil should be further investigated; and
  - Exposed asbestos should be rewrapped wherever possible and removed where necessary.

“Preliminary Environmental Assessment Phase I Report for Industrial Property, 2929 Main Street, Buffalo, New York,” prepared by Hazard Evaluations, Inc. for Keystone Corporation, dated July 26, 1993.

- The purpose of the Phase I Report was to define any readily identifiable, existing or potential, non-operational environmental liabilities; and to update information presented in the 1990 Phase II. HEI completed a site inspection, records review, and report preparation.
- At the time of the Phase I investigation, the subject property was occupied by KeyTech Finishing Corporation and used as an electroplating facility.
- HEI identified the following potential and existing environmental liabilities associated with the subject site:
  - A variety of asbestos containing materials (ACM) were observed. ACMs which were damaged or disturbed would represent a potential environmental liability. These materials should be analyzed for the presence of asbestos, and if present, should be appropriately repaired or removed;
  - The potential exists for peeling paint to be lead-based paint. The paint should be analyzed and if lead is verified, appropriate repair or removal be completed;
  - Due to past use of petroleum products, organic solvents and heavy metals, the potential exists for surface and subsurface soil contamination to be present, which was confirmed in the 1990 Phase II. Petroleum and lead impacted soils were identified during the investigation. Some of the areas of concern identified in the Phase II report were reportedly remediated prior to Keytech Finishing Corporation gaining ownership of the subject property. The remedial activities included the removal of contaminated soil from under the historical aboveground petroleum storage tanks and possibly removal of the lead-laden soils in that area. However, verification results or records were provided.

- Documentation of the remedial efforts should be obtained from previous owners.
- The potential exists for solvent (trichloroethylene) contamination of the sump under the unused vapor degreaser and should be further investigated to better define this potential liability;
- Potential for PCBs contamination of facility surfaces from historical spills of contaminated oil associated with the transformers and should be further investigated;
- Improved housekeeping activities were recommended for the first floor (main building), precious metals room, and electroless nickel line; and
- Scrap materials and general refuse observed on the subject property should be collected and disposed appropriately.

“Asbestos Inspection of Keystone Corporation – Plating Building, 2929 Main Street, Buffalo, New York 14214” prepared for Keystone Corporation by Stohl Environmental, LLC dated December 14, 2006.

- The purpose of the asbestos inspection was to identify and quantify the types of asbestos containing building materials (ACBM) throughout the plating building.
- The inspection and analysis revealed the following ACMB:
  - ~ 3,000 sf of 9x9 floor tile
  - ~ 3,000 sf of mastic for floor tile
  - ~125 sf of brown linoleum
  - ~ 450 lf of mag pipe insulation
  - ~ 500 lf of duplex pipe insulation
  - ~1,200 sf of boiler insulation
  - ~ 32 sf of fire door insulation
  - ~ 75 sf of window caulk on wood windows
  - ~ 75 sf of window caulk on metal windows
  - ~ 50 sf of repair tar – 3<sup>rd</sup> floor metal windows
  - All roofing material assumed to be ACM
  - ~ 12 sf of elevator break pads

#### **5.6 Site and Area Descriptive Chain-Of-Use**

A copy of the Abstract of Title was not supplied to HEI for review. The subject site is located in the City of Buffalo addressed at 2929 and 2939 Main Street. According to records at the City of Buffalo Assessor's Office<sup>1</sup>, ownership of the subject site is currently registered to Keystone Corporation.

The following historical ownership information was available at the Erie County Real Property website at <http://www2.erie.gov/ecrpts/>:

### 2929 Main Street

<b>Owner</b>	NATIONAL FINISHING CORP	<b>Book-Page/Date</b>	7528-272 * 10/31/1968 *
<b>Owner</b>	KEYSTONE CORPORATION	<b>Book-Page/Date</b>	10177-440 * 5/29/1990 *

### 2939 Main Street

<b>Owner</b>	ERIE COUNTY IDA	<b>Book-Page/Date</b>	9292-703 * 12/20/1983 *
<b>Owner</b>	KEYSTONE CORPORATION	<b>Book-Page/Date</b>	10721-605 * 8/13/1993 *

A summary of most probable site history indicates that the subject site was partially used as a quarry prior to 1900s and originally developed around 1909-1910 as Automotive Transportation Company (mfr of electric trucks). Buildings 1, 2, 4, and portions of Building 3 were constructed between 1909 to 1916. Building 3 was expanded through the 1910s to 1920s. The site buildings were occupied by several previous industries, including Martin Schwartz Inc. (mfr of gasoline pumps), Plews Puffed Products, Corp (cereal mfrs), Wright Company (dairy equipment mfrs), Old Dutch Foods, Inc., McDougall Butler Co., Inc. (paint mfrs), and National Finishing Corp (plating). Historical site occupants also included an automotive repair facility along the southern property border and various office operations including SUNYAB Campus Mail, Hospice Buffalo, Main Hertel Counseling Services, Campfire Girls of Buffalo, Friendship Social Club and Environmental Education Associates.

#### **5.7 Use History of Adjoining/Nearby Properties**

Adjacent/nearby properties to the have been developed since at least 1916 and used for various manufacturing operations, an automotive service station, and railroad tracks.

## **6.0 SITE RECONNAISSANCE**

### **6.1 Description of Site Processes**

A site reconnaissance was completed on November 25, 2014, by HEI Director of Site Services Michele Wittman, Project Manager Peter Bojczuk, Senior Environmental Engineer Michael Fay, and Staff Geologist Robyn Ventura. The site reconnaissance consisted of a walking observation of the existing on-site buildings and grounds. Michael Karet, representative of the property and Keystone Corporation (i.e., Key Site Manager) and Jennifer Masse, Keystone General Manager, were present during the site reconnaissance. Photographs taken of the subject site during the site reconnaissance are presented in Appendix C. It should be noted that HEI's observations were limited in some areas due to visual obstructions (i.e., flooring, walls, stored materials,

landscaping, etc.). The subject site is improved with four separate structures identified by HEI as Buildings 1, 2, 3 and 4.

- Building 1 is used exclusively for office purposes.
- Buildings 2 is utilized as a rental property, currently rented to The Display Company (holiday decoration storage) and vacant;
- Building 3 is used for electroplating and other related metal finishing operations, including several processing areas, a wastewater treatment area, maintenance area, laboratory, utility areas, storage areas and office space. Additionally, the building is used for storage of miscellaneous parts & equipment and also contains a designated hazardous waste storage area (wastewater treatment filter cake).
- Building 4 is used for storage of incoming parts for processing, finished product, and miscellaneous storage of equipment.

The exterior of the subject property includes remnants from an oil pump house located on the southeastern portion of the property and also remnants from a historical garage located near the southern property border. Exterior areas immediately surrounding the buildings are generally paved with either asphalt, concrete or dirt and gravel material, used for parking, access and storage. The eastern and southeastern portion of the site consists of vacant land that has become overgrown with vegetation.

## **6.2 Exterior Observations**

The subject site consists of two contiguous parcels which comprise a combined total of approximately 4.97 acres of land. Exterior observations were limited in the eastern and southeastern portions of the site due to the presence of dense vegetation within these areas.

**6.2.1 Hazardous Substances and Petroleum Products** – No hazardous substances or petroleum products were observed on the exterior portion of the site during the site reconnaissance.

**6.2.2 Underground and Aboveground Storage Tanks** – No USTs or ASTs were observed during the exterior reconnaissance. Additionally, Mr. Karet was not aware of current or historical USTs at the subject site. Mr. Karet indicated Building 4 was previously heated with fuel oil stored in an AST on the north side of the building. HEI observed a concrete pad which was likely the AST storage pad. No areas of significant staining were observed on or near the concrete pad.

Several unidentified steel pipes were observed on the exterior portion of the site. These pipes were noted in various locations including in the wooded area on the southeastern portion of the subject property in the area of a former oil pump house, in the dirt and gravel covered area east of Building 4 and along the exterior walls of Buildings 3 and 4. Three pipes were observed which may be possible fill or vent pipes associated with USTs.

Two capped 4" diameter PVC pipes were observed extending up from the ground on the northwest portion of the subject site (located approximately four feet from rear wall of adjacent commercial building). The origin/purpose of these pipes is unknown.

**6.2.3 Pits, Ponds or Lagoons** - An apparent water meter pit covered at grade with steel plates was noted within the lawn area near the site entrance drive. Several covered manhole openings and other appurtenances suspected to be related to on-site utilities were also observed at grade across the site. No ponds or lagoons were noted on the subject site.

**6.2.4 Stained Soil or Pavement** – No areas of significant exterior staining were observed during the exterior site reconnaissance.

**6.2.5 Stressed Vegetation** – No areas of stressed vegetation were observed during the site reconnaissance; however, observations were limited due to the time of year (winter when vegetation growth is limited).

**6.2.6 Fill/Solid Waste** – General facility refuse and recyclable materials are stored in separate dumpsters located east of Building 3. These materials are reportedly transported off-site for recycling/disposal by Waste Management. No additional areas of solid waste storage were observed.

Several piles of rubbish and debris were observed scattered throughout the wooded area on the southeastern portion of the subject site, including roofing shingles, asphalt, concrete, bricks, scrap wood, scrap metal, junk tires, rusted 55-gallon drums, railroad ties and household-type refuse. Some of these materials appeared to be partially buried or covered with soil/fill material. Piles of broken branches and brush and small mounds of soil/fill were also observed on the southeast portion of the property.

**6.2.7 Wastewater and Storm Water Discharge** – No exterior sources of wastewater discharge were observed during the site reconnaissance. Three storm drains were observed on the exterior portion of the site, including within the paved area between Buildings 3 and 4, within the dirt/gravel covered area north of Building 3, and within the gravel area north of Building 4 near equipment storage. The discharge point for these storm drains is unknown.

**6.2.8 Wells or Drywells** - No water supply wells were noted on the subject site during the site reconnaissance. Additionally, Mr. Karet confirmed the subject site is serviced with municipal water supply provided by Erie County Water Authority. No drywells were observed during the site reconnaissance. Additionally, Mr. Karet was not aware of drywells at the subject site.

**6.2.9 Septic System** – According to the Mr. Karet, the subject site is currently serviced by the municipal sanitary sewerage system. No evidence of any former or existing on-site septic systems was observed during the site reconnaissance.

**6.2.10 Pools of Liquids** - No pooled liquids were observed on the subject site during the site reconnaissance.

**6.2.11 Electrical Transformers/Hydraulic Equipment** – Three canister type/pad-mounted transformers were noted in a courtyard area associated with Building 3. Three large canister-type transformers were also observed to be mounted to the roof of Building 4. Additionally, a total seven pole-mounted transformers were noted on-site along the northern and southern property boundaries. No PCBs labels were noted on the transformers and no fluid leakage observed on the transformers or pads. No indication as to the ownership or PCBs content of these transformers was identified by HEI. However, Mr. Karet indicated the transformers within the courtyard and on top of Building 4 are owned by Keystone. Additionally, Mr. Karet believed the courtyard transformers likely contained PBCs.

It should also be noted that a concrete pad enclosed with a chain link fence was observed on the north side of Building 3. HEI suspects this pad may be associated with some former electrical transformers that were identified in historical fire insurance maps.

**6.2.12 Other Exterior Observations** – A former oil pump house is present in the southeastern portion of the subject site. The pump house is brick construction and in poor condition. As mentioned above, numerous pipes were observed near and within the pump house. The pipes may have been oil transfer pipes, fill pipes and/or vent pipes. The purpose of the pump house is not known.

A concrete pad for the former automotive repair facility was observed along the southern property limit. No drains or staining was observed on the pad.

No additional exterior observations were identified.

### **6.3 Interior Observations**

The subject site includes four buildings: an office building (Building 1), rental building (Building 2), main building (Building 3) and storage building (Building 4). Interior reconnaissance was completed with site personnel listed above and included a walkthrough visual inspection of the four buildings.

**6.3.1 Current Property Use** – The subject site consists of four buildings, as summarized below:

- Building 1 – office building utilized by Keystone Corporation
- Building 2 – rental building, eastern portion rented to The Display Company for storage of holiday decorations, and the western area and second floor are currently vacant
- Building 3 – current electroplating and anodizing facility, in general process include cleaning parts, dipping parts into various solutions for electroplating or anodizing and rinsing. Wastewater is generated during process which is treated on-site prior to discharge to the municipal sanitary sewer system.
- Building 4 – currently used for storage of incoming parts, finished product and equipment.

**6.3.2 Heating/Cooling** – Each building is currently heated with natural gas sources. Forced air furnace is present in Building 1 and office/vacant portions of Building 2. The storage areas of Building 2 and Building 4 are heated with natural gas ceiling suspended units. Building 3 is heated with two natural gas boiler systems.

**6.3.3 Hazardous Substances Use/Storage** - Large quantities of various hazardous substances were noted to be stored throughout Building 3 during the site reconnaissance. These materials included various acids, caustics, solvents, cyanide solutions, and other electroplating and anodizing chemicals which were stored in containers ranging from five to 55-gallons in capacity. Chemical solutions used for process operations (electroplating, anodizing, polishing and pickling) and rinse waters containing various metals (lead, nickel, copper, aluminum, cadmium, chromate, zinc, tin, gold and silver) are stored in numerous small tanks located on the first and second floors of Building 3 in proximity to each respective process or operation. The numerous tanks located in the various processes/operations are generally open at the top to allow for product to be dipped into the solution for a given purposes/effect, and then transferred to the next tank in the line for the next purpose/effect. Several electroplating “lines” are present in the facility. A map and index that identifies of the various lines, tanks, and contents is included in Appendix E.

The anodizing line located in the western portion of Building 3 (Room 11) is located over a collection pit. Spillage or drainage from the tanks is collected into the pit, where the liquids drain to a sump located on the northern side of the pit, and then pumped to the neutralization tank located within wastewater pretreatment system. The integrity of the pit could not be inspected due to the presence of the tanks. A pit/trench was also associated with the electroplating line in the southern portion of Building 3 (Room 4). However, the tanks associated with this line, as well as the lines within the precious metals room (2<sup>nd</sup> floor) are not located over pits. Evidence of past chemical spillage (staining,

residue, and/or corrosion) was apparent on the floor surfaces near and under and around the tanks in the processing areas electroplating process areas.

Various 55-gallon drums of chromic acid and spent concentrated chromic acid were labeled as hazardous waste and stored near the chromium line within Room 4 (first floor in Building 3). Ms. Masse indicated that sodium metabisulphite is added to the waste in a mixing tank to chemically change the hexavalent chromium to trivalent chromium (lower toxicity and better treatability) which is then pumped to the wastewater treatment system for treatment prior to discharge to the public sewer system. The hazardous waste drums and treatment tank were not located in an area of secondary containment. Spillage was apparent on the floor in the area as evidenced by the green/blue staining on nearby surfaces.

The precious metals room, located in Room 1 on the second floor of Building 3 has three plating lines and includes 80 tanks. Satellite collection stations are set up throughout the room to collect various chromium, nickel, cyanide, nitric and sulfuric acids solutions. These solutions are blended through the wastewater pretreatment system. Typically, up to twenty 55-gallon drums would be utilized in the various process in the precious metals room. The drums and process tanks were not located in areas of secondary containment. Evidence of spillage and dripping was observed on the floor throughout the area. The floor appeared to have several inches of hard residues accumulated which represented years of buildup in the area.

In the southern portion Building 3 in Room 2 on the second floor is an acid waste storage area and hazardous waste storage area. Ms. Masse indicated the hazardous waste drums are stored in this area and pumped into the acid holding tank which is bled into the neutralization tank associated with the wastewater pretreatment system. Once the 55-gallon drums are emptied, they are reused to collect additional waste. The hazardous waste and other drums within this area are not located in an area of secondary containment.

An additional storage area is located in the southeast portion of the second floor (Room 2) which generally contains 5-gallon containers of various production additives used as brighteners in solutions and fiber containers with powdered cleaners. No areas of staining were observed near this storage area.

A laboratory is also located in the southern portion of Building 3 on the second floor (Room 6). The laboratory contains basic quality assurance testing supplies to test the solutions for pH, check metal levels, cyanide levels, etc. Numerous small containers and bottles of various testing chemicals was stored on shelves within laboratory area.

A cyanide storage room (Room 3) is located through the laboratory. The hydrogen cyanide is stored in powdered form in this room.

The wastewater treatment area is located on the eastern portion of Building 3 on the first floor (Room 7) and contains a series of large ASTs ranging in size from 1,000 to 4,000-gallons which are used for the storage and treatment of plating-related wastewaters. Filter cake, the solid waste generated from the pretreatment process, is collected in cubic yard bags and stored in Building 3 prior to being picked up for off-site disposal as a hazardous waste (F006) by Tonawanda Environmental. Additional information on the wastewater treatment is included in Section 6.3.11 below.

Several 55-gallon drums of chemicals including caustics, (caustic soda, hypochlorite, sodium hypochlorite, rustilo), nitric acid, sulfuric acid, and five-gallon buckets of polymers, are utilized in the wastewater pretreatment system, and were stored in the wastewater pretreatment area. Additionally, empty drums of manganese phosphate and eight full drums of zinc phosphate are also stored in this area. Ms. Masse indicated the manganese and zinc products are used within one of the electroplating lines; however, these compounds may not be used on a daily basis and the plating liquid is stored in the drums when not in process. The drums and tanks located within the wastewater treatment area were not stored within an area of secondary containment.

A separate storage room, identified by Ms. Masse as the acid storage room (Room 9), adjoins the wastewater pretreatment area to the north. This room contains a nitric acid holding tank (2000-gallon capacity) which is used to hold the nitric acid used to clean the nickel tank as needed. Additionally, several 55-gallon drums and 5-gallon pails of various solutions, including isopropanol, hydrogen peroxide, muriatic acid, sulfuric acid and fluoroboric acid, various 5-gallon containers and 50-pound bags of additive materials are all stored in this area. The majority of these materials appeared to be properly stored at the time of the site reconnaissance. However, the drums are not within an area of secondary containment and evidence of past chemical spillage (staining, residue, and/or corrosion) was apparent on the floor surfaces throughout the storage area.

Various chemicals are stored throughout Room 2 on the first floor. In general, these chemicals are stored in 55-gallon drums and contain the various electroplating liquids used in the anodize line. No areas of staining were observed near this storage area

Typical boiler-type additives were present in 5 to 55-gallon containers in the boiler room (Room 1 on first floor). Additives included water softener/salts, scale remover and algaecide.

Three 55-gallon drums of unknown contents were present in the basement of Building 2. One of the 55-gallon drums was labeled "Aroclor 1254" which is a PCBs mixture. Additionally, several one to five-gallon containers of paint and joint compound, a box containing four gallon-size bottles of unknown liquid covered in a white powdery substance and several plastic bags labeled "Danger

– Contains Asbestos Fibers”. Mr. Karet was not aware of these materials being present in the basement. Additionally, he surmised that perhaps these materials were training tools used by a previous occupant which completed asbestos training.

**6.3.4 Petroleum Products Usage/Storage** – During the site reconnaissance, three five gallon containers of hydraulic oil were observed on the third floor of Building 3. These containers were stored within the vicinity of an old hydraulic elevator system is reportedly no longer in service.

The wastewater pretreatment system on the first floor of Building 3 (Room 7) includes a hydraulic filter press. Speedy dry/absorbent material and oil staining was observed on the concrete surface near the filter press. One open 5-10 gal container of apparent waste oil was also noted stored within Room 7.

An approximate 30-gallon container of unknown oil was observed in Building 4. The container was open topped. No staining was observed. No additional petroleum products usage or storage were observed on the subject site.

**6.3.5 Underground and Above Ground Storage Tanks** – No USTs were observed within any of the interior areas associated with the subject site during the site reconnaissance. Mr. Karet was not aware of existing or former USTs.

Unidentified piping was noted extending up through the floors in some locations inside Buildings 3 and 4.

The on-site wastewater pretreatment system incorporates eight above ground tanks ranging in size from 1,000 to 4,000 gallons. These tanks are used to clarify and neutralize materials such as process chemicals, rinse water or wastes generated during on-site process and collected from pits or waste storage drums located throughout the electroplating process lines in Building 3.

**6.3.6 Drums and Containers** – Drums of regulated substances were observed within many of the interior areas associated with the subject site as indicated in Section 6.3.4 above. Various storage area of new materials as well as process wastes are stored in various areas throughout Building 3.

**6.3.7 PCBs Usage/Electrical Transformers** – Three elevators are located within Building 3, including an out-of-service hydraulic elevator located in the eastern portion of the site which extends to the third floor. Mr. Karet indicated the hydraulic “in-ground” piston need to be replaced, and therefore the elevator is not operational. The two remaining elevators are electric elevators.

Fluorescent light fixtures were also noted throughout the on-site structures. The possibility for PCBs to be present within hydraulic elevator system and fluorescent light ballasts exists. A 55-gallon drum of unknown contents labeled

with a sticker marked Aroclor 1254 (a suspect PCBs mixture) was observed within the basement of Building 2.

**6.3.8 Stains or Corrosion** - Areas of staining, dried residues and/or corrosion, were noted on the floor surfaces within areas of the process electroplating lines, drum storage areas, and satellite storage areas, and wastewater treatment area within Building 3 (Room 7). In addition, oil staining was noted on the floor in the area of the hydraulic filter press located in the waste water treatment area as well as in the boiler room in Building 3.

The wood floor of the precious metals plating area located on the second floor of Building 3 (Room 1) exhibited extensive buildup of residue throughout the room.

**6.3.9 Fill/Solid Waste Disposal** – Solid waste materials generated by the facility are stored outdoors in a pair of dumpster containers prior to being picked up for off-site disposal.

**6.3.10 Wastewater** - Wastewaters generated from electroplating process lines and other related metal finishing operations are currently pretreated on-site prior to being discharged to the City of Buffalo sanitary sewer system. The wastewater pretreatment system is located on the first floor in the eastern portion of Building 3 (Room 7) and includes several processes for treating both cyanide and non-cyanide bearing wastes (including neutralization, precipitation, flocculation, settling & clarification). The final stage of the wastewater treatment process involves the dewatering of waste sludge through a filter press. The filter cake generated from the treatment system is placed in bags (one cubic yard capacity) and stored in Building 3 prior to being transported off-site by Tonawanda Environmental.

**6.3.11 Drains and Sumps** – As mentioned above, Building 3 includes in-floor trenches and pits that discharge to the on-site wastewater pretreatment system. The various pits and trenches in the building were not able to be inspected due to the number of tanks and equipment present. Additionally, Mr. Karet indicated that drains and pits within the building discharge to the wastewater pretreatment system.

An in-floor sump was noted within the acid storage room (first floor Room 9) which according to Ms. Masse is a steam station for the building's boiler system. Another apparent sump/pit covered with steel plate (approximately 2' x 3') was observed in the floor on the opposite side of the wall from where this sump was located. HEI was unable determine whether these appurtenances are connected.

An in-floor pit measuring approximately six feet in width by eight feet in length covered with an open steel grate was observed within the southeast portion of Building 3 (Room 4). Mr. Karet indicated the pit was a former vapor degreasing

system, but is currently not in use. The interior of this pit could not be observed by HEI at the time of the site reconnaissance due to the presence of stored materials and equipment within this area. According to a previous Phase I study of the property, a vapor degreaser pit was historically located in the boiler room of Building 3. However, HEI did not identify this area during the site reconnaissance.

A trench drain was observed in Building 4. Mr. Karet indicated the trench drain currently does not discharge to the wastewater pretreatment system, but has the ability to be easily connected if needed.

**6.3.12 Odors** – Due to the electroplating process occurring in the building, a general “metallic” and “acidic” odor was present throughout Building 3. Moldy/mildew type odors were noted in portion of Building 2. No additional odors were noted.

**6.3.13 Other Interior Observations** – Green staining was observed within pooled liquid on the first floor in the eastern portion of Building 3 (within Room 2). Ms. Masse indicated the liquid had leaked from a tank located on the second floor in the precious metals room.

The concrete floors in Buildings 3 and 4 exhibited evidence of past cutting and/or patching in several locations. At least some of this cutting and patching appears to be attributed to prior sewer repair/replacement or other sub-floor utility work; however, the reason/purpose for the other areas is unknown. The patching/cutting may be associated with connection/trenching of process waters to the wastewater pretreatment system.

A pile wood debris with green and white staining was noted within Building 4. Mr. Karet indicated the wood was generated from a stand that contained a process tank. The wood was to be cut into pieces and disposed, likely as a hazardous waste.

Propane cylinders used in the on-site forklift are stored inside Building 4.

## **6.4 Non-Scope Considerations**

**6.4.1 Asbestos** - A cursory asbestos survey was completed at the time of the site reconnaissance. Based on the age of the structures (built before 1978) and HEI’s limited field observations, HEI suspects that a variety of asbestos containing materials exist within the subject structures including, but not limited to, pipe wrapping, elbow joints, floor tiles, ceiling tiles, caulking compounds, window glazing, fire doors, and roofing materials, etc. Most of these materials were observed throughout the four on-site buildings. Additionally, an asbestos survey completed in 2006 identified ACBM within Building 3, including floor tile and mastic, linoleum, pipe insulation, boiler insulation, fire door insulation,

window caulk, roofing materials and elevator brake pads. Additional ACMs maybe present in Buildings 1, 2 and 4, which were not included within the survey report.

**6.4.2 Lead Paint** - Due to the age of the structures, it is possible that Lead paint was used in its original construction. Extensive areas of peeling paint were observed on the walls and ceilings throughout the subject buildings.

**6.4.3 Lead in Drinking Water** - During the site reconnaissance, no copper piping was observed throughout the on-site water supply system. However, due to the age of the buildings, the possibility of lead in drinking water is present.

**6.4.4 Radon** - During the site reconnaissance, it was observed that Buildings 3, and 4 have slab on grade floors, whereas Buildings 1 and 2 are constructed with partial basements. The potential for Radon gas to be present in the breathing space within the buildings, near openings (e.g., floor drains, joints, cracks, etc.), is of limited concern. According to basement readings prepared by the New York State Department of Health<sup>11</sup>, the City of Buffalo study area has an average Radon concentration of 1.18 picocuries/liter. This level is below the USEPA Action Level of 4.0 piC/L; however, this level is based on a limited number of measurements of basement dwellings in the City of Buffalo and may or may not reflect the actual conditions at the subject site.

**6.4.5 Mold and Mildew** - Areas of suspect mold and mildew odors were noted in Building 2. Additionally, evidence of water damage was noted on the ceiling tiles in Building 2 and 3 and pooled water was observed on the floors in some of the buildings. It should be noted that water damage can promote the growth of mold spores.

**6.4.6 Vapor Encroachment Conditions** - The records reviewed for the subject site identified potential environmental concern (e.g., paint, ink, solvent usage, petroleum, etc.). Based on these uses, and possibly related to the results of any Phase II investigation to be conducted, a Vapor Encroachment Screen or Vapor Intrusion Monitoring appears to be warranted in this case. It should be noted that this Phase I report was not conducted in accordance with ASTM Standard E2600-10 (Vapor Encroachment Screening on Property Involved in Real Estate Transactions).

## 7.0 REGULATORY INFORMATION

### 7.1 Background

The purpose of the regulatory review is to obtain and review reasonably ascertainable records to help identify recognized environmental conditions regarding the subject site. For this review, records were obtained from Environmental Data Resources, Inc. (EDR) and the New York State Department of Environmental

Conservation (NYSDEC)<sup>12</sup>. Under ASTM, information requested and not received within 20 days of the report date will not be incorporated into this report. The approximate minimum search distance (MSD) for the site vicinity review is noted for each database listed below. The regulatory database report for facilities with recognized environmental conditions is presented in Appendix D. A summary of the database information for the subject site vicinity is presented below.

## **7.2 Federal Database Review**

The subject site address of 2929 or 2939 Main Street was listed on the following federal databases reviewed:

- RCRA Large Quantity Generator (LQG) of hazardous waste - indicating that 1,000 kg or more of hazardous waste is generated in a year. Keystone Corporation or Key Tech Finishing, Inc., identified as subject site operators, were identified as LQG since 1992. Additionally, Marlette National Corporation was also listed as a LQG in 1990. Key Tech Finishing was identified as a small quantity generator in 1980, however, based on known history of the site, this listing was likely associated with Key Tech's previous address.

Hazardous waste summary identified wastes as F006 – wastewater treatment sludges from electroplating operations. Additionally, F007 Chromium wastes were also listed.

Several hazardous waste violations were identified for the subject site for records and reporting. Limited information was available on the type of violations. In general, violations included records/reporting, pre-transport, universal waste – small quantity handlers, violations for SR-373-3.3(b) and SR-372.2(a)(8)(i)(a), and LDR-general. Compliance violations were identified for several years, dating from 1986 to 2013. Based on limited information, it appears that the violations were addressed and have achieved compliance. No outstanding violations were identified.

Approximately 20 New York manifests were listed on the database for hazardous waste disposal for the years 2007, 2008, 2009, 2011, 2012 and 2013. In general, New York manifests did not identify waste code; however, one Rhode Island manifest dated 1992 was for 10 gallons of F009 Cyanide disposal.

- The subject property address and occupants (former and existing) were listed on several federal databases. In general, these databases are for various registrations, and not necessarily indicative of a release.

Previous occupants:

- Environmental Education Associates, Inc. listed on Facility Index System (FINDS) which is a central inventory of facilities monitored or regulated by United States Environmental Protection Agency (USEPA). Specific registrations for this facility included National Compliance Database (NCDB) which supports implementation of the Federal Insecticide, Fungicide, and Rodenticide ACT (FIFRA) and Toxic Substances Control Act (TSCA) listings; and an Integrated Compliance Information System (ICIS) listing.

Environmental Education Associates was also listed on the FTTS database which tracks administrative cases and pesticide enforcement actions and compliance activities related to FIRFA, TSCA and Emergency Planning and Community Right-to-know (EPCRA). A FTTS inspection under TSCA was done in 2003 with no violations identified.

- Upper New York State Environmental was listed on the FTTS database with a FTTS inspection under TSCA was done in 2002 and 2006 with no violations identified. Additionally, this facility was listed on FINDS with specific registrations for NCDB, FIFRA/TSCA and ICIS listings.
- SUNY at Buffalo was listed on the FTTS database with FTTS inspection in 2000 under TSCA. No violations were identified.
- National Finishing Corp. was listed on FINDS for FIS (NY Facility Information System) listing.
- Marlette National Corp. was listed on FINDS for FIS listing.

Current Occupant:

- Key Tech Finishing was listed on the FTTS database with a FTTS inspection under EPCRA done in 2001. No violations were identified.
- Key Tech Finishing was listed on the ICIS database for 18 separate enforcement actions under various programs including EPCRA, NDCB, Air Emissions Data (AIRS), RCRAINFO, Facility Registry Services (FRS) and Toxic Chemical Release Inventory System (TRIS).
- AIRS listing was identified as potential uncontrolled emissions <100 tons per year. However, the default compliance status was listed as "in compliance with procedural requirements".
- Keystone Corp. was listed on FINDS for several registrations including NCDB, FIFRA/TSCA, AIRS, USEPA TRIS, RCRA Info, OSHA Establishment, FIS, Hazardous Waste Biennial Reporter, and ICIS.

Several nearby facilities were identified on the federal databases reviewed, located in a potential upgradient or cross-gradient direction, based on an estimated west to northwesterly groundwater flow direction, as listed below:

- The following RCRA Generators were identified within a quarter-mile radius of the subject property:
  - Ivoclar Vivadent, Inc. at 2948 Main Street located approximately 200 feet north (across Main Street), was identified as a RCRA Small Quantity Generator (SQG) of hazardous waste. The facility was listed as a LQG prior to 1999. Three general violations were on record for this site from 1999 and 2000; all three violations have achieved compliance. Based on a review of the corresponding listing details and distance/direction from the subject site, this listing does not appear to present a readily apparent environmental threat to the subject site.
  - Bethune Lofts at 2917 Main Street, is a west adjacent site that is identified as a RCRA NonGenerator of hazardous waste, indicating that this facility historically generated hazardous waste. This site was historically listed as a RCRA-CESQG site in 2012, generating several non-halogenated solvents. No violations for this site were on record. Based on a review of the corresponding listing details and distance/direction from the subject site, this listing does not appear to present a readily apparent environmental threat to the subject site.
  - Illos Piano Rebuilders at 2940 Main Street, is a north adjacent site that is identified as a RCRA NonGenerator of hazardous waste with two general listing violations from 2009. These violations achieved compliance in 2010. Based on a review of the corresponding listing details and distance/direction from the subject site, this listing does not appear to present a readily apparent environmental threat to the subject site.
  - Monro Muffler Brake #51 at 2955 Main Street is a north adjacent site identified as a RCRA NonGenerator. This site was a historical RCRA-SQG site with no violations on record. Based on a review of the corresponding listing details and distance/direction from the subject site, this listing does not appear to present a readily apparent environmental threat to the subject site.

In addition to the above listings, three RCRA-LQG and one RCRA-conditionally exempt SQG was listed on the federal databases reviewed within the indicated search radii. However, based on the facility regulatory status and/or distance/direction from the subject site, these listings do not appear to present a readily apparent environmental threat to the subject site.

### 7.3 State Database Review

The subject property address of 2929 or 2939 Main Street was listed on the following state databases reviewed:

- AST/Historical AST - PBS #9-221430 for registration of two petroleum ASTs.
  - Tank #1 – 10,000-gallon #6 fuel oil AST installed 12/1/75 and closed in place 2/26/07
  - Tank #2 – 5,000-gallon #6 fuel oil AST installed 12/1/75 and closed in place 2/26/07
- CBS facility - CBS #9-000002 for registration of three chemical bulk storage ASTs.
  - Tank #00002 – 370-gallon caustic soda AST installed in 9/1/1955 and listed as “unregulated”
  - Tank #00003 – 470-gallon sulfuric acid soda AST installed 11/1/1999 and closed 11/1/1999
  - Tank #00004 – 1,300-gallon sodium hypochlorite AST installed and closed 11/1/1999
- Spill No. 8602203 – occupant was listed as National Finishing Corp. on 7/2/1986 due to sulfuric acid leaking from tank and entering a floor drain. Spill report from provided by NYSDEC indicated the spill was referred to Buffalo Sewer Authority (BSA) which was satisfied on 8/14/1986. The spill was listed as closed on 8/14/1986.
- Spill No. 9201458 – occupant was listed as Key Tech Finishing on 5/5/1992 due to unknown petroleum found in the sewers on Main and Hertel. A boom was placed in a manhole and NYSDEC inspection did not identify a sheen. Boom was disposed and spill status was listed as closed on 5/26/1992.
- Spill No. 9203981 – occupant was listed as Key Tech Finishing when a spill occurred on 7/7/1992 due to nitric acid spill on concrete floor in the building. The acid was absorbed with pillows and the fumes dissipated. The spill was referred to Division of Air Resources and closed on 7/7/1992.

Several nearby facilities were identified on the state databases reviewed, located in a potential upgradient or cross-gradient direction, based on an estimated west to northwesterly groundwater flow direction, as listed below:

- 2915 Main Street, which adjoins the subject site to the southwest, was listed as spill #0910964 when contamination was found during a soil boring investigation in an old tank area. Testing results identified several exceedance above regulatory limits, however due to site conditions, NYSDEC did not require remedial work. The spill was given an “inactive” status in June 2011. Additionally, this facility was listed on the AST database for a 600-gallon AST that was closed in 2012. HEI contacted NYSDEC to obtain additional information on the spill. NYSDEC representative Thomas Johnson indicated that impacts were

found at shallow depths (less than 2.5 feet) and included semi-volatile organic contamination. With the shallow depth, proximity to the building, lack of petroleum impacts and distance between samples, NYSDEC determined that the analytes found could be associated with fill material and not released contamination, and no further work was needed. However, future excavation work will be addressed by proper disposal. Based on a review of the corresponding listing details and distance/direction from the subject site, this listing does not appear to present a readily-apparent environmental threat to the subject site.

- A north adjacent property, Monroe Muffler Brake #51, addressed at 2955 Main Street, was identified as an AST site with one 250-gallon waste oil AST installed in 1989 and listed as in-service. Based on a review of the corresponding site details, none of the additional sites appear to present a readily-apparent environmental threat to the subject site.
- Elber's Landscaping, addressed at 2918 Main Street which adjoins the Site to the southwest across Main Street, was identified with NY Spill No. 0485213 when contamination was discovered when an UST was removed. Impacted soil was removed and analytical results were below regulatory standards. No further work was required and the spill was given a closed status. Based on a review of the available information and distance/direction from the subject site, this listing does not appear to present a readily-apparent environmental threat to the subject site.
- LaSalle Reservoir, located at Parkridge and E. Amherst, approximately ½ mile southeast of the Site, was listed as a NY hazardous substance waste disposal site. Based on limited information available on the database, the facility is owned by the City of Buffalo and identified as a municipal landfill. Metals and semi-volatile organic compounds were identified as disposed. Based on the distance/direction from the subject site, and limited information, this listing does not appear to present a readily apparent environmental threat to the subject site.

In addition to the above listings, four LTANKs, three UST listings, one AST listing, one CBS listing, and four NY Spills identified on the state databases reviewed within the indicated search radii. However, based on the facilities regulatory status and/or distance/direction from the subject site, these listings do not appear to present a readily apparent environmental threat to the subject site.

#### **7.4 EDR Proprietary Databases**

EDR Proprietary Databases include properties of potential environmental concern that have been identified by EDR through a review of national collections of business directories. The following listings were identified:

- The subject property, addressed at 2933 Main Street was listed as Huggins WM J Auto Repair and identified as an EDR US Historic Auto Station with automotive repair operations.

- North adjacent property, listed as 55 Larkin Company, addressed at 2955 Main Street and Monro Muffler Brake of Buffalo, addressed at 2965 Main Street, were both identified as HEDR US Historic Auto Stations. These facilities are located in an estimated downgradient direction, based on a west to northwesterly groundwater flow direction.

### **7.5 Regulatory Agency File and Records Review**

The purpose of the regulatory agency file and records review is to obtain sufficient information to help determine if a recognized environmental condition, controlled recognized environmental condition, or a de minimis condition exist at the subject site in connection with any listings identified on the subject site or adjoining properties. Based on the information identified above, HEI has send an additional FOIL request to NYSDEC to obtain additional information on 2915 Main Street.

## **8.0 INTERVIEWS AND INFORMATION REQUESTS**

### **8.1 Owners/Operators**

An owner/operator questionnaire was filled out by Mr. Michael Karet, representative of the current site owner, to learn more about the history of the subject site. Details concerning this interview are presented in Section 5.4 and included throughout the report. Additionally, Ms. Jennifer Masse, General Manager, also escorted HEI during the site reconnaissance and provided site information.

### **8.2 Federal and State Agencies**

HEI forwarded written inquiries to the USEPA and the NYSDEC regarding the subject site. The purpose of these inquiries was to obtain information with regard to the presence of hazardous materials, underground bulk storage tanks, known environmental releases, prior environmental studies and the past asbestos remediation work, if any, at or near the subject site. HEI was provided with tank registration information and spill information from the NYSDEC regarding the on-site tanks and spill discussed in section 7.3. At the time of this report, HEI had not received a response from the USEPA. Copies of the written inquiries and the information received to date are included in Appendix E.

### **8.3 Local Agencies**

HEI forwarded written inquiries to the Erie County Departments of Health and Emergency Services regarding the subject site. The purpose of these inquiries was to obtain information with regard to the presence of hazardous materials, underground bulk storage tanks, known environmental releases, prior environmental studies and the past asbestos remediation work, if any, at or near the subject site HEI received a letter from the Erie County Department of Health on December 4, 2014 stating that no records were found for the subject property. Copies of the written inquiries and the data received to date are presented in Appendix E.

HEI also visited the City Hall office for the City of Buffalo. The following information was obtained:

- Buffalo Assessor's Office - Information collected from the Assessor's Office indicates that the subject site is located in the City of Buffalo, identified with SBL # 79.70-5-1 and 79.70-5-2 and is currently owned by Keystone Corporation. The subject property has historically been addressed at 2933 and 2935 Main Street. Records indicate that the subject property is developed with five structures that were constructed in 1949. It should be noted that based on historical building permits and Sanborn maps, the buildings were constructed prior to 1949.
- Building Permits - Information collected from current and historical records indicates that the following were constructed on-site:
  - storehouse (1910),
  - storage shed (1911),
  - two-story office building (1916),
  - two-story brick building (1913),
  - shipping room (1917),
  - pump house (1927),
  - electric switch house (1946), and
  - boiler house and hardware manufacturing building (1946).

Records also indicate that a permit was issued for two 3,000-gallon steel tanks for the storage of acetate, installed on-site in 1961 and three 4,000-gallon steel tanks for the storage of solvent, installed in 1954.

Permit cards were identified for 2933 Main Street, listed as Larkin Co. Inc.

- 8/18/27 – brick service station and two 12,500-gallon gas tanks
- 10/14/27 – frame pump house
- 10/10/27 – two 12,300-gallon gas tanks

The permit card had limited information and did not identify tank locations. It is unclear if the Larkin Co. Inc. is the subject site, or possibly the northern adjoining property, which was historically a gasoline station

- Fire Department<sup>1</sup> - Records at the Buffalo Fire Department indicate that a tank was removed from the subject property in 1970. However, no additional the file information, such as tank location or contents, was available for review.

## 9.0 FINDINGS AND CONCLUSIONS

HEI has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM practice E 1527-05 of the subject site located at 2929 Main Street, Buffalo, Erie County, New York. Several data gaps were identified that could have significantly affected HEI's ability to identify recognized environmental conditions associated with the subject site, as described below. Any exceptions to or

deletions from this practice are described in Appendix F (Objectives and Limitations) of this report.

This assessment has revealed no evidence of recognized environmental conditions in connection with the subject site, except for the following:

- The subject property has included various manufacturing or electroplating operations since construction in 1910. Past operations have utilized various hazardous substances and petroleum products during routine operation. Historical storage and disposal practices for currently regulated substances are not known. Additionally, current and past registrations as a large quantity generator of hazardous waste confirms historical use of hazardous materials and generation of hazardous wastes at the subject site. A previous Phase II assessment performed in 1990 confirmed petroleum and metals impacts within subject site soil. Although limited impacted areas were reportedly remediated, including the removal of petroleum and lead-laden contaminated soils, documentation and confirmation of soil analytical testing was not provided. A potential remains both that releases have impacted the soil profile and/or groundwater at the subject site, and for petroleum and lead impacted areas to be present.
- Several former buildings were located on the subject site and included a tin shop and automotive repair building with boiler room. Past operations of these facilities would have included various petroleum products and hazardous materials. Historical storage, transportation and disposal methods are not know. Potential releases from the past operations may have impacted soil and/or groundwater at the subject site.
- Four USTs were located in the current the courtyard/transformer area in Building 3; one UST was located north of Building 2; and closed-in-place UST was located under the building floor in the wastewater treatment area. Historical records identified four USTs installed at 2933 Main (former site address) as well as construction of a pump house in 1927. Additionally, two ASTs were previously located north of Building 4 on the northern property limit. Petroleum impacts were noted in the surface soil samples near the two ASTS during the 1990 Phase II. No information was provided or identified regarding the closure of the USTs. Potential release from the former tanks may have impacted the soil profile and/or groundwater at the subject site.
- Several pipes, possibly vent or supply pipes, were observed protruding from the ground and building in the area of a former oil pump house. The purpose of the oil pump house and nature of these pipes is unknown. Previous Phase II investigation identified petroleum impacts in the surface soil collected near the pump house. Potential release from the pump house and/or pipes may have impacted soil profile and/or groundwater at the subject site.

- A railroad spur is located on the south and eastern portion of the subject site. Semi-volatile organic compounds and metals are historically associated with ballasts associated with railroad lines. During historical use of the railroad spur it is possible that petroleum products and/or hazardous materials were shipped/transported along the rail. The potential exists for spills and/or releases to have impacted the soil profile and/or groundwater at the subject site.
- Various general debris/refuse as well evidence of mounding and filling was observed in the eastern and southeastern areas of the subject site. Observed debris included brick (pieces and former walls), concrete, rusted/empty 55-gallon drums, 5-gallon pails, roofing shingles, tires, and wood. The known fill material and previous drum contents, if any, pose a potential for release to the subject site soil profile and/or groundwater.
- Three transformers were present in the courtyard area of Building 3, as well as three transformers located on the roof of Building 4. It is unknown if the transformers contain PCBs. Potential releases from the transformer oil may have resulted in impacts in the vicinity of the transformers.
- Various pits and trenches are associated with the current electroplating operations and are used to contain and transport waste liquids to the wastewater pretreatment system. The integrity of the pits could not be inspected due to the various tanks and process lines present. Potential cracks in the pits or trenches may result in leakage of waste liquids to the soil profile and/or groundwater.
- A pit/sump was observed in the southeast corner of Building 3. The pit was reportedly associated with a former vapor degreaser that utilized trichloroethene (TCE). Previous reports indicated the floor of the sump has signs of cracking. Potential releases to the sump may have results in soil, groundwater, or vapor intrusion impacts at the subject site.
- The precious metals room, located on the second floor in Building 3, has a wood floor with extensive buildup of residue from general dripping during routine operations. Based on the operations performed in this room, the residues built up on the floor would likely be considered a hazardous waste. Cleanup and disposal of this material would likely require handling and disposal in accordance with appropriate NYSDEC regulations.
- An adjacent property, Monro Muffler, addressed at 2955 Main Street, was identified as a current and historical automotive repair facility with several previous tanks associated with operations. Although this property is in an estimated down gradient direction from the subject site, potential releases from the tanks may have migrated to the subject site.

In this context, HEI recommends that a subfloor and subsurface investigation be completed on the subject site to assess if the soil profile and/or groundwater have been impacted by historical site operations. Additionally, due to the usage of various solvents and petroleum products at the subject site, a vapor intrusion survey should also be completed to assess possible vapors within the slab and indoor air.

This assessment has revealed no evidence of controlled recognized environmental conditions in connection with the subject site, except for the following:

- An adjacent property, Monro Muffler, addressed at 2915 Main Street, was listed as spill #0910964 when contamination was found during a soil boring investigation. The information was provided to NYSDEC; however, no further work was required and the spill was given an “inactive” status due to site conditions. The “inactive” status means that residual contamination remains on the property, although no further work is required by the regulatory agency.

This assessment has revealed no evidence of historical recognized environmental conditions, except for the following:

- The subject site was identified as having Spill Nos. 8602203, 9201458 and 9203981 for historical spills. In each case, the spill was addressed to the regulatory requirements and a closed/meets standards status was issued. No further work was required.

HEI does note the following de minimis matters which, although not rising to the level of recognized environmental conditions, present limited liability and should be considered by the Client:

- Numerous holding tanks are used throughout the electroplating process located on the first and second floors of Building 3. In general, the tanks appeared to be in fair to good condition. However, evidence of drippage and spillage was apparent throughout the electroplating areas. The spillage is typically collected in trench drains/sumps/pits which discharge to the on-site wastewater pretreatment system. Tank integrity should be evaluated and tanks should be replaced if necessary. Effort should be made to eliminate process drippage and spillage.
- One approximate 30-gallon open top container containing a known oil was present in Building 4. The contents should be properly disposed.
- Green stained wood was observed in Building 4. It appears that the green staining originates from waste liquids generated in the precious metals room, would likely be considered hazardous waste, and should thereby be properly cleaned with any residues being managed as hazardous wastes.

- The various fill and debris piles thought the wooded areas on the southeastern portion of the building should be properly disposed.
- Secondary containment was not observed in the area of the drums throughout the facility, nor near the wastewater treatment facility. Best management practices would indicate the implementation of secondary containment.
- Hazardous waste generated as filter cake from the wastewater pretreatment system is stored near the filter press. However, one bag of the waste was observed in Building 4. The hazardous waste storage area should be defined and appropriately labeled.
- Hazardous waste drums of concentrated chromic acid were stored near the chromium plating line. This waste is mixed in a mixing tank with sodium metabisulphite to change the valence state of the chromium before it is processed in wastewater pretreatment system. Spillage was apparent in the area. The mixing tank should be retrofitted with secondary containment to control releases of this hazardous liquid.
- Various drums of unknown contents and gallon-size bottles covered in white residue, as well as several plastic bags labeled as “Danger – Contains Asbestos Fibers” were observed in the basement of Building 2. These materials should be properly classified and disposed.
- Oil staining was observed on the concrete floor in the wastewater pretreatment room near the filter press, which has an apparent oil leak. The equipment should be properly repaired to prevent additional leakage.
- Green staining within pooled liquid on the first floor in the eastern portion of Building 3 (within Room 2) indicates the presence of chromium and suggests this residue is a hazardous waste. Appropriate actions should be taken to both clean up such staining and prevent future spillage from the second floor from seeping through the wood floors on to the first floor.

Finally, HEI notes the following non-scope considerations which, although addressed as additional issues under the ASTM E1527-13 Standard, present limited liability and should be considered by the Client:

- A variety of suspected asbestos containing materials were observed throughout the subject buildings, including but not limited to, pipe insulation floor tiles, transite wallboard, and ceiling tiles. Additionally, an asbestos survey completed in 2006 identified ACM within Building 3, including floor tile and mastic, linoleum, pipe insulation, boiler insulation, fire door insulation, window caulk/glazing, roofing materials and elevator break pads. Additional ACMs maybe present in Buildings 1, 2 and 4 which were not included within the survey report. Due to the condition of these materials, it is recommended that surveys of suspect asbestos-

containing materials be completed and any necessary abatement be conducted at the subject site prior to any demolition or renovation.

- Due to the age of the buildings, it is possible that lead paint was used in the original construction. Extensive areas of peeling paint were observed on the walls and ceilings throughout the subject buildings. HEI recommends that samples be analyzed for lead by an accredited laboratory. Should the presence of lead be confirmed, repair and removal of these materials should be conducted according to state regulations prior to any demolition or renovation.
- Water damaged ceilings were noted in Buildings 2 and 3 and pooled water was observed in certain areas. The water damage can promote mold growth. The roof and leaks should be appropriately repaired to prevent further water intrusion from occurring.

If information is received through the Freedom of Information Letter requests, which identify any further environmental concerns, HEI will contact our Client immediately with the revised conclusions. Field notes and other information relating to this project are available for review at HEI in Orchard Park, New York.

## **10.0 DEVIATIONS AND ADDITIONAL SERVICES**

### **10.1 Data Gaps**

HEI has performed a Phase I Environmental Site Assessment (ESA) in conformance with the scope and limitations of ASTM practice E 1527-05 of the subject site. The only data gaps noted that could have significantly affected HEI's ability to identify recognized environmental conditions associated with the subject site include the following:

- HEI's observation of the subject site was limited due to stored materials throughout the structures and due to thick vegetation located throughout the southern and eastern portion of the subject property; and winter conditions, as noted above.
- Records requested from the NYSDEC and the USEPA had not been received at the time of this report.
- A data failure was identified through the lack of standard historical sources that covered the period of developed use during the years from 1910 to 1916. Therefore, HEI was unable to determine the exact construction date of the subject structures, as well as any other site-related conditions.

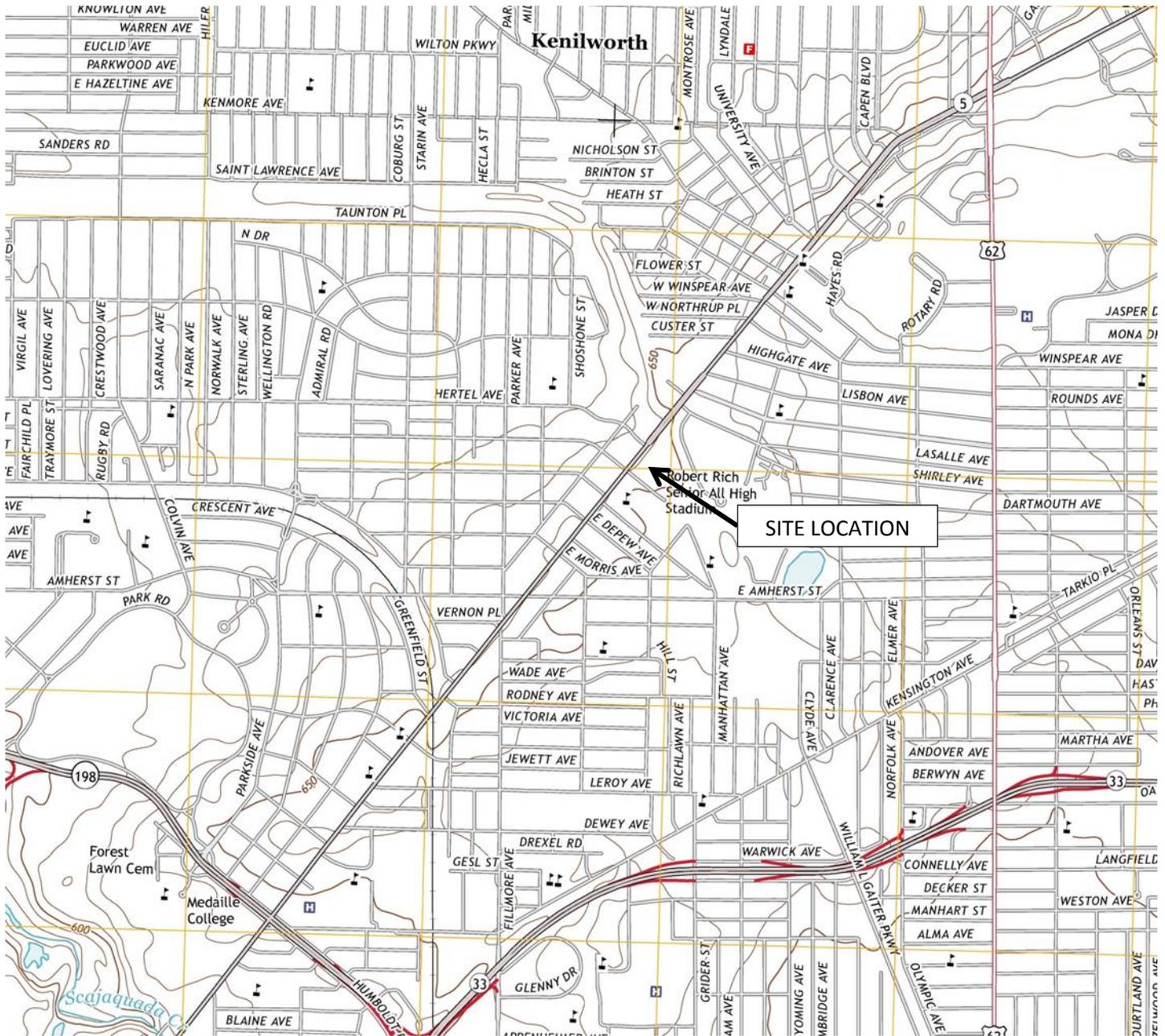
### **10.2 Deviations**

Except for the limitations and exceptions noted in Appendix F, this Phase I ESA is generally compliant with ASTM Standard 1527-13.

### **10.3 Additional Services**

No additional services beyond the scope of the ASTM Standard 1527-13 other than the limited non-scope items listed above were conducted as part of this Phase I ESA.

**APPENDIX A**  
**FIGURES**



THIS DRAWING IS FOR ILLUSTRATIVE AND INFORMATIONAL PURPOSES ONLY  
AND WAS ADAPTED FROM USGS, BUFFALO NE, NEW YORK 2013 QUADRANGLE.



<b>HAZARD EVALUATIONS, INC.</b>		
<i>Phase I/II Audits – Site Investigations – Facility Inspections</i>		
<b>LOCATION PLAN</b>		
COMMERCIAL PROPERTY		
2929 & 2939 MAIN STREET		
BUFFALO, NEW YORK		
<b>KEYSTONE CORPORATION</b>		
BUFFALO, NEW YORK		
DRAWN BY: LSH	SCALE: 1:24,000	PROJECT: e1405
CHECKED BY: MW	DATE: 11/14	FIGURE NO: 1

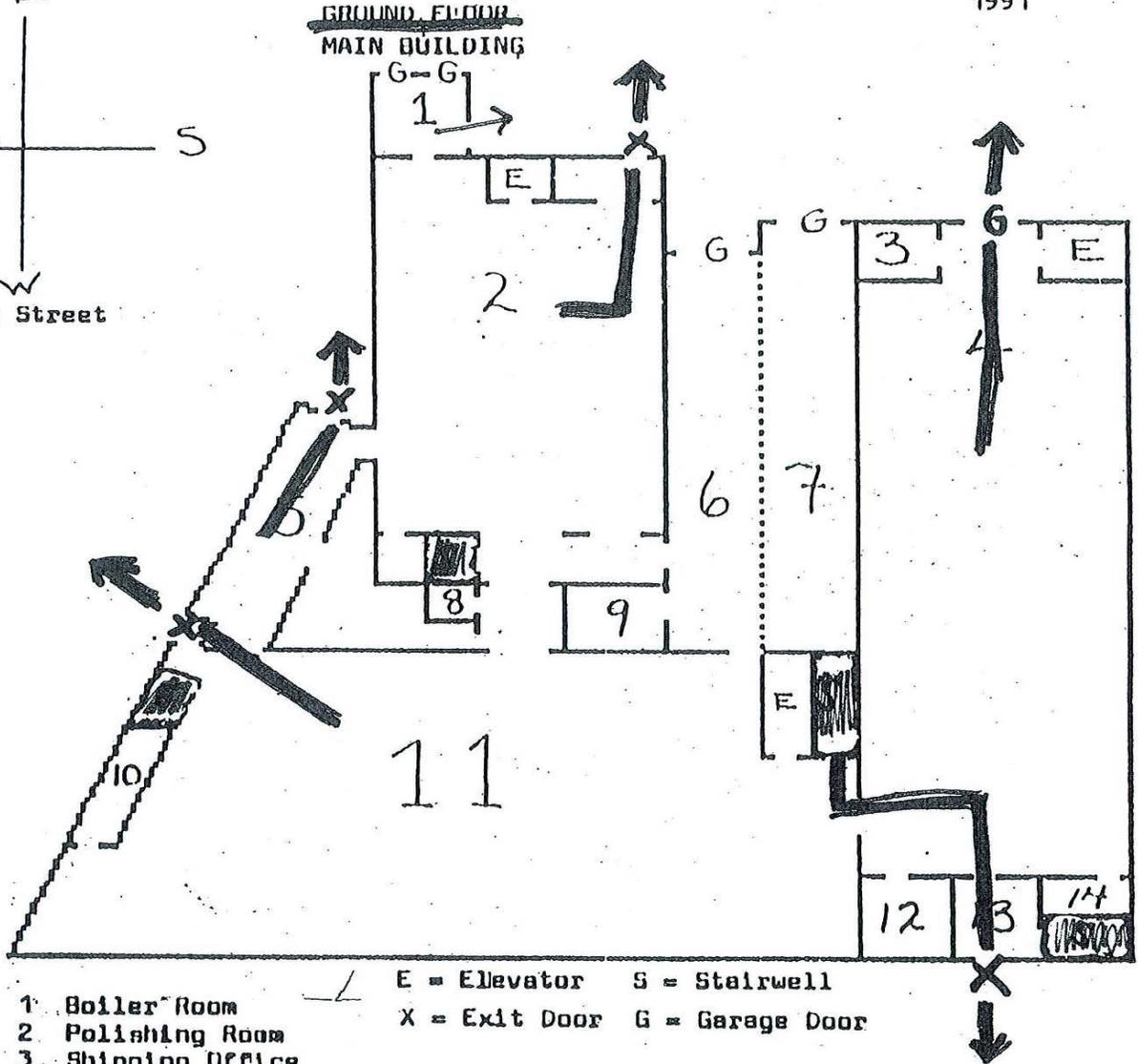
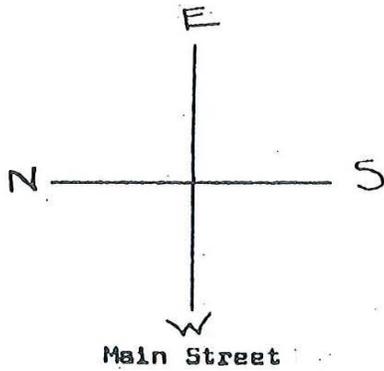


<b>HAZARD EVALUATIONS, INC.</b>		
<i>Phase I/II Audits – Site Investigations – Facility Inspections</i>		
<b>SITE LOCATION</b>		
COMMERCIAL PROPERTY 2929 & 2939 MAIN STREET BUFFALO, NEW YORK		
<b>KEYSTONE CORPORATION</b>		
BUFFALO, NEW YORK		
DRAWN BY: LSH	SCALE: NOT TO SCALE	PROJECT: e1405
CHECKED BY: RV	DATE: 12/14	FIGURE NO: 2

EVACUATION ROUTES

KEYTECH CORPORATION

KT 9011 Rev.D  
1991



- 1 Boiler Room
- 2 Polishing Room
- 3 Shipping Office
- 4 Production Room
- 5 Storage
- 6 Garage
- 7 Waste Treatment
- 8 Power Room
- 9 Waste Storage
- 10 Men's Room
- 11 Production Room
- 12 Office
- 13 Entrance
- 14 Women's Room

E = Elevator    S = Stairwell  
X = Exit Door    G = Garage Door

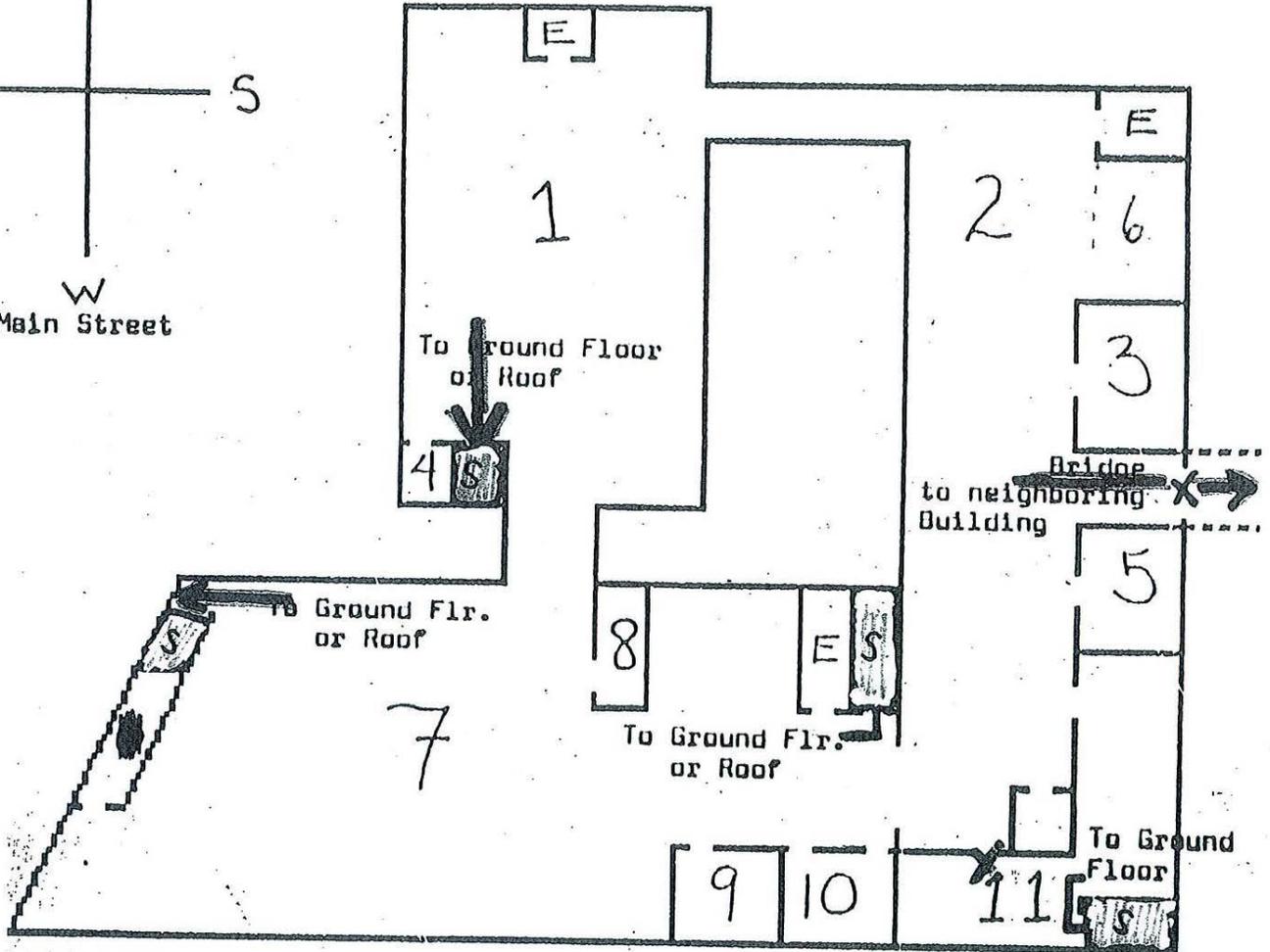
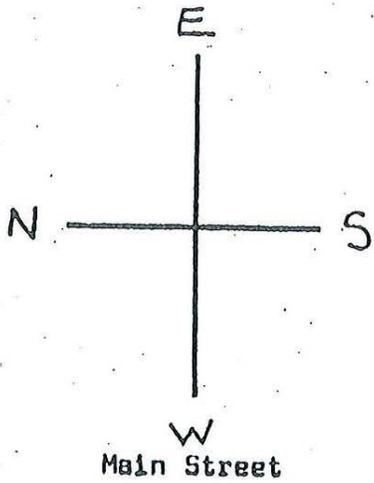
X You Are Here

<b>HAZARD EVALUATIONS, INC.</b>		
<i>Phase I/II Audits – Site Investigations – Facility Inspections</i>		
<b>LOCATION PLAN</b>		
<b>FIRST FLOOR</b>		
COMMERCIAL PROPERTY		
2929 & 2939 MAIN STREET		
BUFFALO, NEW YORK		
<b>KEYSTONE CORPORATION</b>		
BUFFALO, NEW YORK		
DRAWN BY: --	SCALE: NOT TO SCALE	PROJECT: e1405
CHECKED BY: MW	DATE: 01/15	FIGURE NO: 3

EVACUATION ROUTES

KEYTECH CORP.  
SECOND FLOOR  
MAIN BUILDING

KT 9011 Rev.0  
1991



- 1 Gold Room
- 2 Production Room
- 3 Storage
- 4 Men
- 5 Storage
- 6 Lab
- 7 Production Room
- 8 Production Office
- 9 Inspection
- 10 Lunchroom
- 11 Office

S = Stairwell      E = Elevator  
X = Exit Door

X You Are Here

<b>HAZARD EVALUATIONS, INC.</b>		
<i>Phase I/II Audits – Site Investigations – Facility Inspections</i>		
<b>LOCATION PLAN</b>		
<b>SECOND FLOOR</b>		
COMMERCIAL PROPERTY		
2929 & 2939 MAIN STREET		
BUFFALO, NEW YORK		
<b>KEYSTONE CORPORATION</b>		
BUFFALO, NEW YORK		
DRAWN BY: --	SCALE: NOT TO SCALE	PROJECT: e1405
CHECKED BY: MW	DATE: 01/15	FIGURE NO: 4

**APPENDIX B**

**COMPLETED USER/CLIENT and/or  
OWNER QUESTIONNAIRES**

**PHASE I ESA  
USER/CLIENT QUESTIONNAIRE**

Site Name/Address:

User (Business) Name:

User Address:

Name & Title of Representative:

Reason for Conducting Phase I:

- 1) Are you aware of any environmental cleanup liens against the property that are filed or recorded under federal, tribal, state or local law?

NO .

- 2) Are you aware of any Activity Use Limitations (AULs), such as engineering controls, land use restrictions or institutional controls that are in place at the site and/or have been filed or recorded in a registry under federal, tribal, state or local law?

NO .

- 3) As the user of this ESA, do you have any specialized knowledge or experience related to the property or nearby properties? For example, are you involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business?

NO .

- 4) Does the purchase price being paid for this property reasonably reflect the fair market value of the property? If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the property?

NA

5) Are you aware of commonly known or reasonably ascertainable information about the property that would help the environmental professional to identify conditions indicative of releases or threatened releases?

NO .

6) Do you know the past uses(s) of the property?

PAINT FACTORY  
PLATING FACILITY SINCE 1965.

7) Do you know of specific chemicals that are present or once were present at the property?

NO .

8) Do you know of any spills or other chemical releases that have taken place at the property?

NO .

9) Do you know of any environmental cleanups that have taken place at the property?

SOME SOIL REMEDIATION IN 1991 .

10) As the user of this ESA, based on your knowledge and experience related to the property, are there any obvious indicators that point to the presence or likely presence of contamination at the property?

NO .

NAME: MICHAEL KARET

SIGNATURE:



TITLE: VICE PRESIDENT

DATE:

12/8/14

**APPENDIX C**  
**SITE PHOTOGRAPHS**

**PROJECT:** Phase 1 Environmental Site Assessment

**CLIENT:** Keystone Corporation

**PROJECT LOCATION:** 2929 & 2939 Main Street, Buffalo, New York

**PROJECT NUMBER:** e1405

**DATE TAKEN:** 11/25/2014

**TAKEN BY:** R. Ventura

**Photo 1:**



**Photo 2:**



**Photo 3:**



**Photo 4:**



Photo 1: Building 1: Exterior View of Building 1.

Photo 2: Building 2: Exterior of Building 2.

Photo 3: Building 2: 9 x 9 Floor tiles.

Photo 4: Building 2: Bags in basement, labeled as "Danger – contains Asbestos Fibers".

**PROJECT:** Phase 1 Environmental Site Assessment

**CLIENT:** Keystone Corporation

**PROJECT LOCATION:** 2929 & 2939 Main Street, Buffalo, New York

**PROJECT NUMBER:** e1405

**DATE TAKEN:** 11/25/2014

**TAKEN BY:** R. Ventura

**Photo 5:**



**Photo 6:**



**Photo 7:**



**Photo 8:**



Photo 5: Building 2: Water damage to ceiling and ceiling tiles.

Photo 6: Building 2: Unknown white powder (and drum to right) in basement.

Photo 7: Building 3: Overgrown area between Building 3 and adjoining Monroe Muffler. Note: Purpose of white pipes is not known.

Photo 8: View of site, looking northeast.

**PROJECT:** Phase 1 Environmental Site Assessment

**CLIENT:** Keystone Corporation

**PROJECT LOCATION:** 2929 & 2939 Main Street, Buffalo, New York

**PROJECT NUMBER:** e1405

**DATE TAKEN:** 11/25/2014

**TAKEN BY:** R. Ventura

**Photo 9:**



**Photo 10:**



**Photo 11:**



**Photo 12:**



Photo 9: View of site, looking southeast.

Photo 10: Equipment storage near exterior storm grade.

Photo 11: Railroad spur on-site.

Photo 12: Piles of debris in eastern area of site.

**PROJECT:** Phase 1 Environmental Site Assessment

**CLIENT:** Keystone Corporation

**PROJECT LOCATION:** 2929 & 2939 Main Street, Buffalo, New York

**PROJECT NUMBER:** e1405

**DATE TAKEN:** 11/25/2014

**TAKEN BY:** R. Ventura

**Photo 13:**



**Photo 14:**



**Photo 15:**



**Photo 16:**



Photo 13: Piping associated with oil pump house.

Photo 14: Drum and piping near oil pump house.

Photo 15: Building 3: Exterior of Building 3.

Photo 16: Building 3: Electroplating line of 1<sup>st</sup> Floor (Room 4).

**PROJECT:** Phase 1 Environmental Site Assessment

**CLIENT:** Keystone Corporation

**PROJECT LOCATION:** 2929 & 2939 Main Street, Buffalo, New York

**PROJECT NUMBER:** e1405

**DATE TAKEN:** 11/25/2014

**TAKEN BY:** R. Ventura

**Photo 17:**



**Photo 18:**



**Photo 19:**



**Photo 20:**



Photo 17: Building 3: Electroplating Line on 1<sup>st</sup> Floor (Room 11).

Photo 18: Building 3: Wastewater treatment system and drum storage.

Photo 19: Building 3: Wastewater treatment system – Hazardous waste filter cake.

Photo 20: Transformers located in courtyard of Building 3.

**PROJECT:** Phase 1 Environmental Site Assessment

**CLIENT:** Keystone Corporation

**PROJECT LOCATION:** 2929 & 2939 Main Street, Buffalo, New York

**PROJECT NUMBER:** e1405

**DATE TAKEN:** 11/25/2014

**TAKEN BY:** R. Ventura

**Photo 21:**



**Photo 22:**



**Photo 23:**



**Photo 24:**



Photo 21: Building 3: Compressor Room (1<sup>st</sup> Floor, Room 2).

Photo 22: Building 3: Pit for former vapor degreaser.

Photo 23: Building 3: Precious metals room, 2<sup>nd</sup> floor.

Photo 24: Building 3: Cyanide storage room.

**PROJECT:** Phase 1 Environmental Site Assessment

**CLIENT:** Keystone Corporation

**PROJECT LOCATION:** 2929 & 2939 Main Street, Buffalo, New York

**PROJECT NUMBER:** e1405

**DATE TAKEN:** 11/25/2014

**TAKEN BY:** R. Ventura

**Photo 25:**



**Photo 26:**



**Photo 27:**



**Photo 28:**



Photo 25: Building 3: Hazardous waste drum storage (background) and powder additive storage (foreground).

Photo 26: Building 4: Equipment storage in building.

Photo 27: Building 4: Drain in building (Note: Drum is empty).

Photo 28: Building 4: Hazardous waste filter cake storage.