INVENTUM ENGINEERING

August 19, 2025

Benjamin McPherson, P.E.
New York State Department of Environmental Conservation (NYSDEC)
700 Delaware Avenue
Buffalo, NY 14209

RE: Aboveground Storage Tank Management Construction Completion Report
Riverview Innovation & Technology Campus, Inc.
3875 River Road
Town of Tonawanda, NY 14150
Brownfield Cleanup Program Site No. C915353

Inventum Engineering, P.C. (Inventum), on behalf of Riverview Innovation & Technology Campus, Inc. (Riverview), is submitting this revised Aboveground Storage Tank (AST) Tank Management Construction Completion Report (CCR) which describes the sampling and closure of the ASTs that were not registered with the New York State Department of Environmental Conservation (NYSDEC) for the Riverview Brownfield Cleanup Program (BCP) Site (#C915353) located at 3875 River Road, Tonawanda, New York. The Riverview Tank Management and Closure Work Plan was approved by NYSDEC in January 2021. The management of the registered Chemical Bulk Storage (CBS) and Petroleum Bulk Storage (PBS) Tanks is presented under separate cover in the CBS and PBS Tank Closure Construction Completion Report. The AST closure and contents disposal occurred from February 2021 through May 2024.

This CCR addresses the sampling and closure of the ASTs left on the BCP site by the previous owner(s) and operators. A total of 47 ASTs were included in the Riverview Tank Management and Closure Work Plan. The ASTs were grouped by railcars, general ASTs, labeled process tanks, water treatment tanks, quench and fire protection, gas handling, and a hot water tank. The caustic tote ST30 was added to this CCR, as it was tracked on the Weekly Tank Management Summaries to NYSDEC throughout its sampling, disposal, and closure, totaling 48 ASTs. Four ASTs were either empty and scrapped upon implementation of the Work Plan and two sumps were misidentified as ASTs during preliminary site characterization. These six vessels are described in this cover letter, and the closure of the remaining 42 ASTs are addressed by this CCR.

Organization

Enclosed in the transmission folder is a Transmittal Key summarizing the tank closure report groupings, a CAMP Data appendix with daily air quality monitoring summaries, and Figures 1 - 9 showing the site grid references and former tank locations.

The individual Tank Construction Completion Reports include:

- Documentation of the AST including location, size, contents description, and closure procedure.
- Photographic documentation.
- Tabulated sampling results and laboratory analytical data packages.
- Waste disposal manifests or bills of lading.
- A summary of observed evidence of leaks once the AST was removed.

- Dates of tank-related work completed corresponding to daily CAMP air quality data.

Summary notices were provided to NYSDEC and New York State Department of Health (NYSDOH) on a weekly basis over the course of active AST management. The weekly summaries included notice of planned activities, completed activities, approvals sought or received, samples collected, laboratory data received, and waste shipments.

Adjustments to the Work Plan

Please note the following adjustments to the quantification of ASTs addressed in the Work Plan and CCR.

- The text on page 1 of the Work Plan stated 46 ASTs were identified, but should have stated 47 ASTs, which is the correct summation of the bulleted tank groupings following the statement on page 1.
- During the IRM Work Plan, ST30 was identified and added to the ASTs to be managed, totaling 48 ASTs.
- The six ASTs addressed in the subsequent sections of this cover letter were either managed before implementation of the Work Plan (ST29), empty and scrapped upon implementation of the Work Plan (PT15, ST27, and ST28) or were sumps misidentified as ASTs (ST25 and ST26).
- A total of 42 ASTs is presented in the transmittal key and CCR folders.
- Note that the caustic storage tank ST10 was removed before implementation of the AST Work Plan.

Please note the following adjustments to the Work Plan figures which are reflected in the CCR Figures:

- The caustic tote labeled ST30 (Figure 2) was added to Table 1, tracked on the Weekly Summaries, and managed in accordance with the Work Plan.
- Figure 2 – The Light Oil Area tank PT14 was renamed PT12
- Figure 3 – The Tar Management Area tank PT11 was renamed PT14
- Figure 3 – The Tar Management Area tank PT12 was renamed PT11
- Figure 2 – The Chemical Bulk Storage (CBS) and Petroleum Bulk Storage (PBS) tanks ST04, ST05, ST06, ST07, and ST12 to ST19 were removed from AST CCR Figures and are included in the CBS PBS Tank Closure CCR Figures.

ST29

Tank ST29 was located near the former Rod Mill building (Grid Location R14). ST29 was a vertical steel tank 36-inches in diameter and 40-inches in height with a capacity of 175 gallons. It contained approximately 140 gallons of hydraulic or lubricating oil. The oil was consolidated with sitewide used oils for bulk pick up by NOCO in November 2020.

ST25 and ST26

The tanks named ST25 (grid location R7) and ST26 (grid location S7) were further inspected upon implementation of the Work Plan and were found to be sumps, not ASTs. The sumps are being managed under the Remedial Action Work Plan (RAWP).

Photograph No. 1: Location of presumed tanks ST25 and ST26.

Empty Tanks

There were three tanks managed upon implementation of the Work Plan. PT15, ST27, and ST28 were found to be empty and were removed from the BCP site as scrap.

PT15 – Former Flow Through Dehydrator Tank (Grid Location S6)

Photograph No. 2: The former flow through dehydrator tank PT15.

ST27 – A tar storage tank that was located on property but never installed (Grid Location U5)

Photograph No. 3: ST27 was onsite and never installed (large black horizontal cylinder). The three additional smaller vessels in the photograph were gas venting vessels associated with the Boiler House and the flares that never contained liquids. They were also removed, cleaned, and recycled.

ST28 – Unknown purpose (Grid Location AI6)

Photograph 4: ST28 was located on the southwest corner of the former compressor building.

Additional Tanks

The AST Work Plan figures also showed the locations of tanks and railcars that were empty and managed before the implementation of the Work Plan. These tanks were sheared and recycled. Figures 1 - 9 include the former locations of railcars RC05, RC06, RC07, RC08, RC09, RC11, RC17, RC18, RC28, RC30 and storage tanks ST08, ST09, and ST11.

Please feel free to call or e-mail any questions or comments.

Respectfully submitted,

John P. Black, P.E.

Partner

CCR Group No.	Tank or Railcar
	Railcars
No. 1	RC01
	RC02
	RC03
	RC04
	RC10
	General Aboveground Storage Tanks
No. 2	ST01
	ST02
	ST10
	ST30
No. 3	ST20
	ST21
	ST22
	ST23
	ST24
No. 4	ST03
No. 5	PT05
	PT06
	PT07
	PT08
	PT11
	PT14
	Labeled Process Tanks (Many were Storage Tanks)
No. 6	PT02
	PT03
No. 7	PT04
	PT12
	PT13
No. 8	PT01

CCR Group No.	Tank or Railcar
	Water Treatment (Sand Filters, Water Softener, Reagent)
No. 9	WT1
	WT2
	WT3
	WT4
	WT5
	WT6
	WT7
	WT8
	WT9
	WT10
	Quench and Fire Protection Tanks
No. 10	FP01
	FP02
	FP03
	Gas Handling
No. 11	GH1
	Hot Water Tank
No. 12	HW1

N

D

100 0 50 100 200 400

1 INCH = 100 FEET (22X34)

DRAWING BY

CHECKED

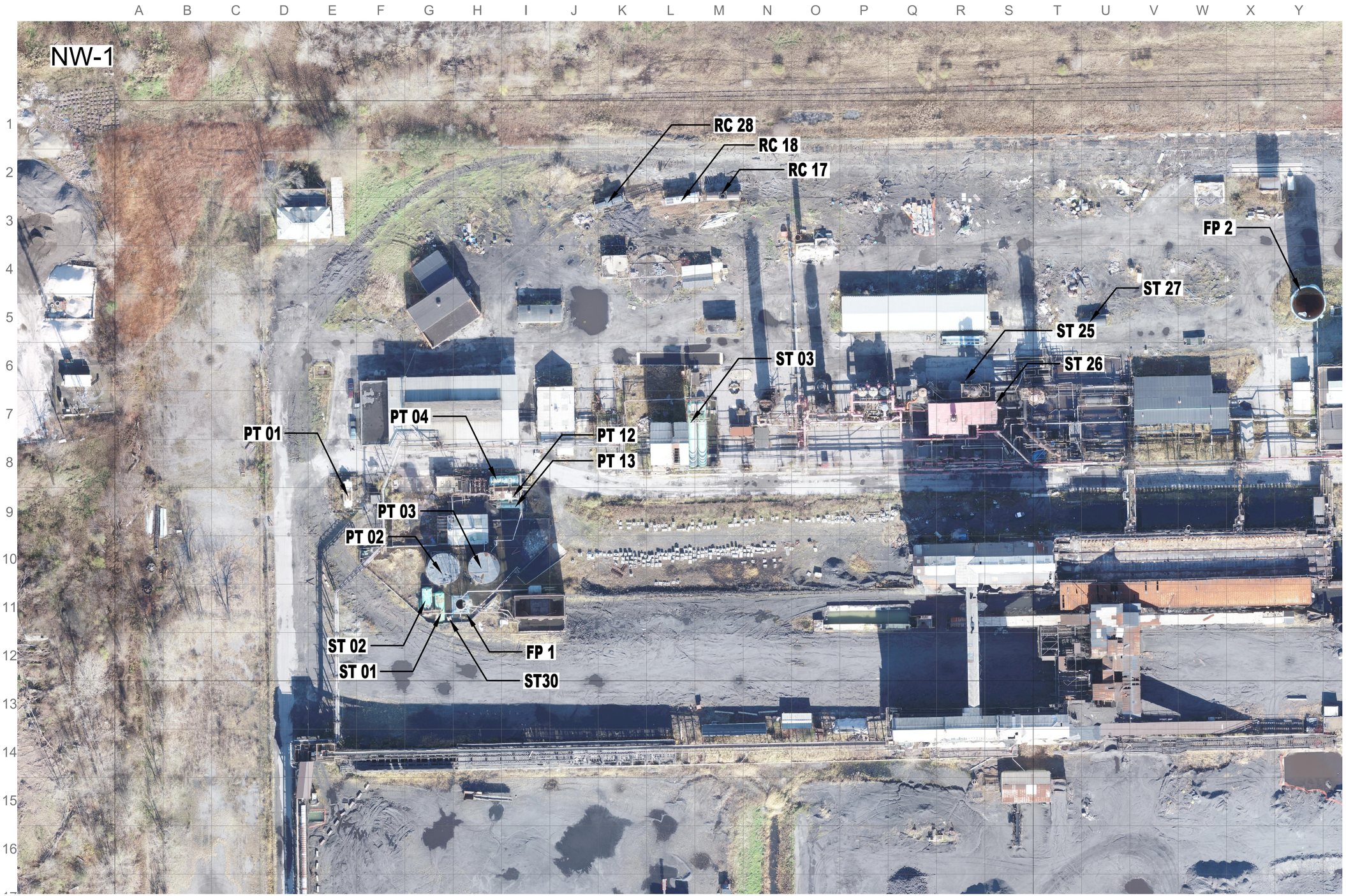
APPROVED

KEY PLAN
BROWNFIELD CLEANUP PROGRAM SITE
RIVERVIEW INNOVATION & TECHNOLOGY CAMPUS, INC.
3875 RIVER ROAD
TONAWANDA, NEW YORK 14150

INVENTUM ENGINEERING
481 CARLISLE DRIVE
SUITE 202
HERNDON, VIRGINIA 20170
(703) 722-6049
www.InventumEng.com

FIGURE 1

DRAWING NUMBER
107A



D

100 0 50 100 200 400

1 INCH = 100 FEET (22X34)

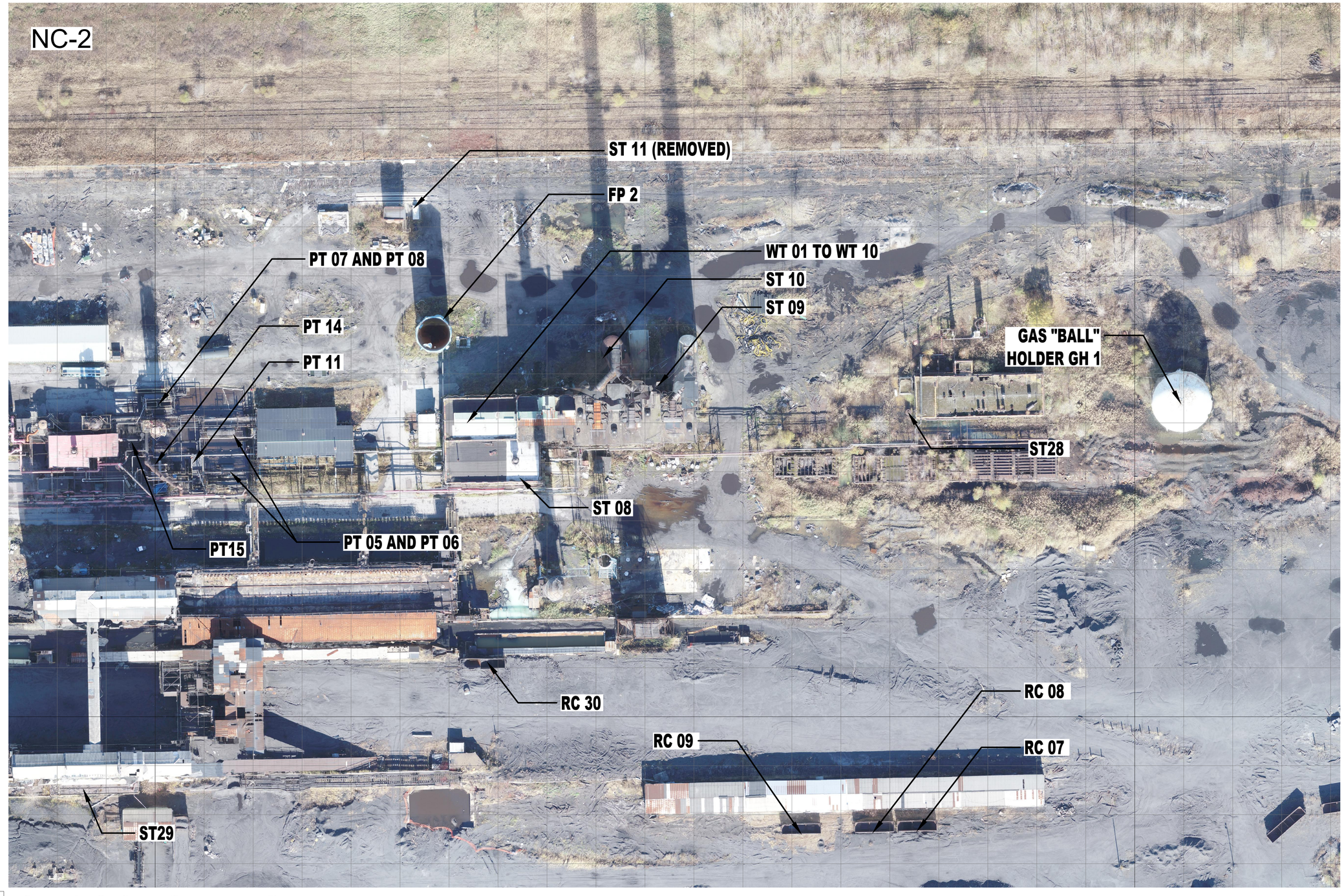
DRAWING BY	
CHECKED	
APPROVED	

NORTH WEST SECTION OF PROPERTY TANKS AND RAIL CARS

INVENTUM ENGINEERING
481 CARLISLE DRIVE
SUITE 202
HERNDON, VIRGINIA 20170
(703) 722-6049
www.InventumEng.com

FIGURE 2

DRAWING NUMBER
107A



D

50 0 25 50 100 200

1 INCH = 50 FEET (22X34)

DRAWING BY

CHECKED

APPROVED

NORTH CENTRAL SECTION OF PROPERTY
TANKS AND RAIL CARS

INVENTUM ENGINEERING
481 CARLISLE DRIVE
SUITE 202
HERNDON, VIRGINIA 20170
(703) 722-6049
www.InventumEng.com

FIGURE 3

DRAWING NUMBER

107A

AG AH AI AJ AK AL AM AN AO AP AQ AR AS AT AU AV AW AX AY AZ BA BB BC BD BE BF BG B

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16

N

D

50 0 25 50 100 200

1 INCH = 50 FEET (22X34)

DRAWING BY

CHECKED

APPROVED

NORTH EAST SECTION OF PROPERTY
TANKS AND RAIL CARS

INVENTUM ENGINEERING
481 CARLISLE DRIVE
SUITE 202
HERNDON, VIRGINIA 20170
(703) 722-6049
www.InventumEng.com

FIGURE 4

DRAWING NUMBER

107A

D

50 0 25 50 100 200

1 INCH = 50 FEET (22X34)

DRAWING BY

CHECKED

APPROVED

CENTRAL WEST SECTION OF PROPERTY TANKS AND RAIL CARS

INVENTUM ENGINEERING
481 CARLISLE DRIVE
SUITE 202
HERNDON, VIRGINIA 20170
(703) 722-6049
www.InventumEng.com

FIGURE 5

DRAWING NUMBER

107A

D

50 0 25 50 100 200

1 INCH = 50 FEET (22X34)

DRAWING BY

CHECKED

APPROVED

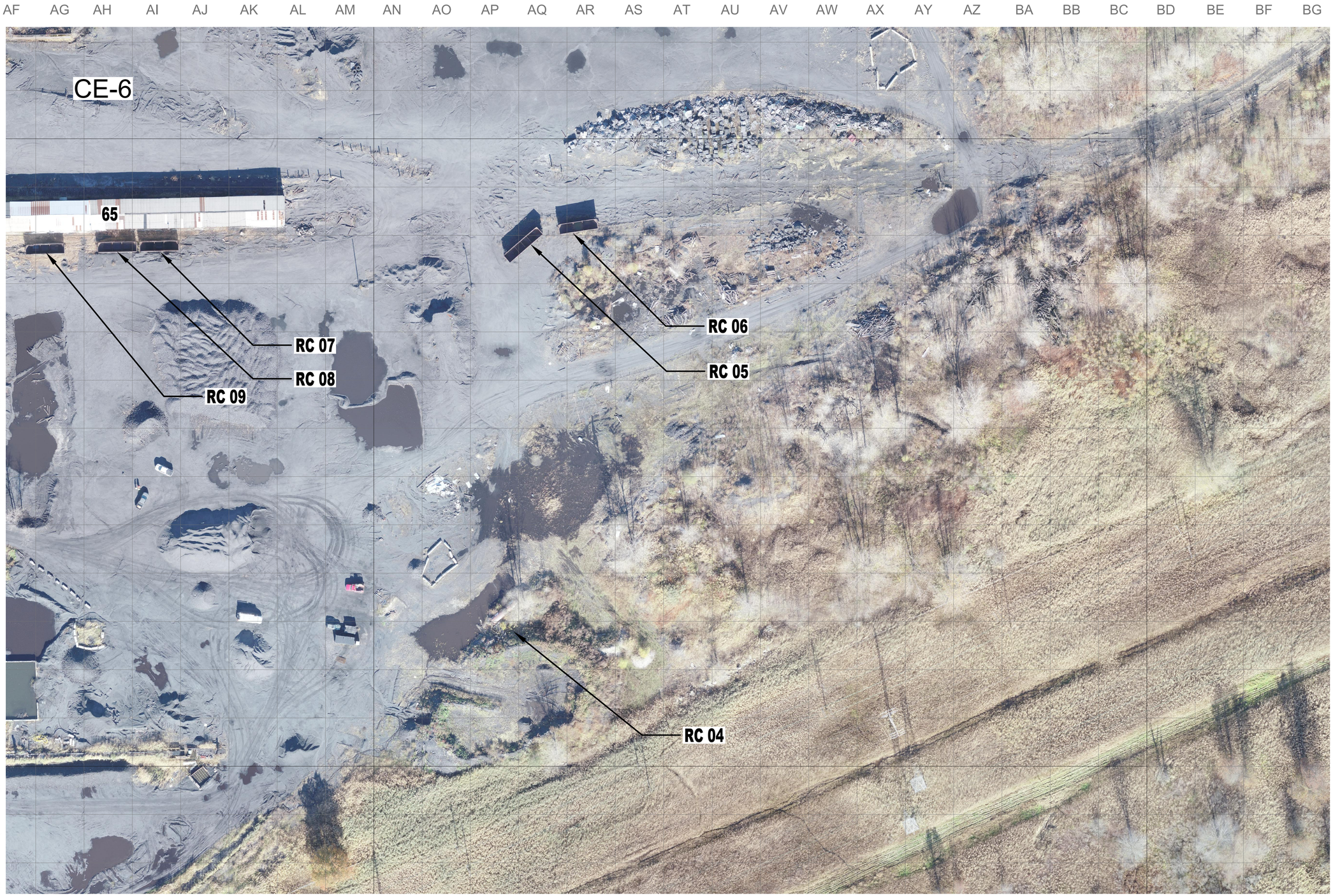
CENTRAL CENTRAL SECTION OF PROPERTY TANKS AND RAIL CARS

INVENTUM ENGINEERING
481 CARLISLE DRIVE
SUITE 202
HERNDON, VIRGINIA 20170
(703) 722-6049
www.InventumEng.com

FIGURE 6

DRAWING NUMBER

107A



D

50 0 25 50 100 200

1 INCH = 50 FEET (22X34)

DRAWING BY

CHECKED

APPROVED

CENTRAL EAST SECTION OF PROPERTY
TANKS AND RAIL CARS

INVENTUM ENGINEERING
481 CARLISLE DRIVE
SUITE 202
HERNDON, VIRGINIA 20170
(703) 722-6049
www.InventumEng.com

FIGURE 7

DRAWING NUMBER

107A

D

50 0 25 50 100 200

1 INCH = 50 FEET (22X34)

DRAWING BY

CHECKED

APPROVED

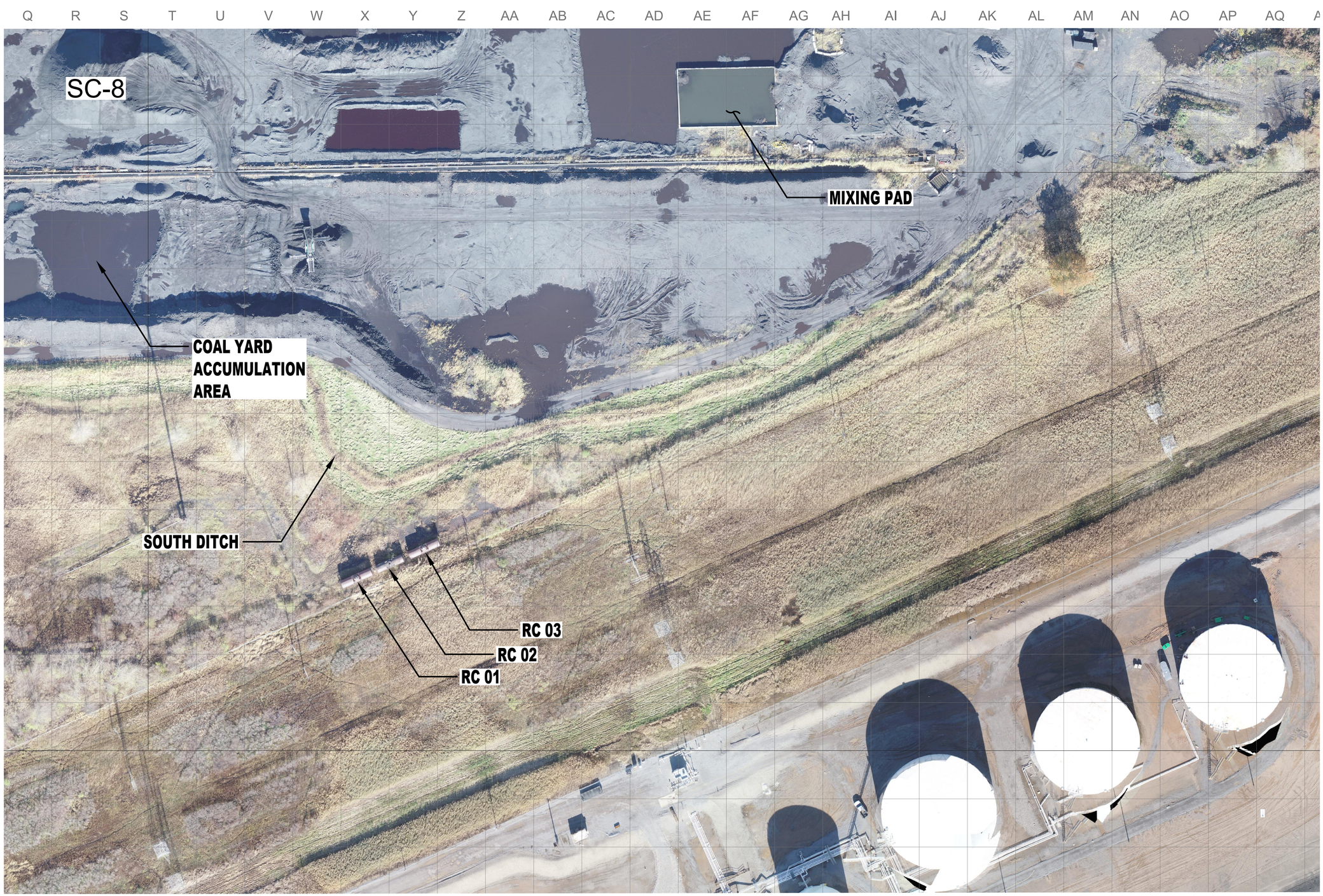
SOUTH WEST SECTION OF PROPERTY
TANKS AND RAIL CARS

INVENTUM ENGINEERING
481 CARLISLE DRIVE
SUITE 202
HERNDON, VIRGINIA 20170
(703) 722-6049
www.InventumEng.com

FIGURE 8

DRAWING NUMBER

107A



D

50 0 25 50 100 200

1 INCH = 50 FEET (22X34)

DRAWING BY

CHECKED

APPROVED

SOUTH CENTRAL SECTION OF PROPERTY TANKS AND RAIL CARS

INVENTUM ENGINEERING
481 CARLISLE DRIVE
SUITE 202
HERNDON, VIRGINIA 20170
(703) 722-6049
www.InventumEng.com

FIGURE 9

DRAWING NUMBER

107A