Periodic Review Report

7503 Niagara Falls Boulevard
Niagara Falls, New York
(BCP Site No. C932126)

June 2014 0101-013-001

Prepared For:

GLR Holdings, LLC

Prepared By:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

2558 Hamburg Turnpike, Suite 300, Lackawanna, New York | phone: (716) 856-0599 | fax: (716) 856-0583

PERIODIC REVIEW REPORT

7503 NIAGARA FALLS BOULEVARD SITE
(BCP SITE NO. C932126)

NIAGARA FALLS, NEW YORK

June 2014 0101-013-001

Prepared for:

GLR Holdings, LLC

Prepared By:

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

PERIODIC REVIEW REPORT

7503 Niagara Falls Blvd Site

Table of Contents

PERIODIC REVIEW REPORT
7503 Niagara Falls Blvd Site
Table of Contents

FIGURES

APPENDICIES

1.0 INTRODUCTION

Benchmark Environmental Engineering and Science, PLLC (Benchmark), in association with TurnKey Environmental Restoration, LLC (TurnKey) has prepared this Periodic Review Report (PRR), on behalf of GLR Holdings, LLC, to summarize the post-remedial status of New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) Site No. C932126.

This PRR has been prepared for the 7503 Niagara Falls Boulevard Site in accordance with NYSDEC DER-10 *Technical Guidance for Site Investigation and Remediation* The NYSDEC's auto-generated Institutional and Engineering Controls Certification Form has been completed for the Site (see Appendix A). This PRR and the associated inspections form has been completed for the May 16, 2013 to May 16, 2014 reporting period.

1.1 Site Information

The Site is located in the City of Niagara Falls, County of Niagara, New York, and formerly addressed at 7503 Niagara Falls Boulevard, Niagara Falls, New York. GLR Holdings, LLC redeveloped two adjoining parcels, 7503 and 7543-7555 Niagara Falls Blvd) as a fast food restaurant (see Figures 1 and 2). The 7503 Niagara Falls Boulevard parcel (Site) was investigated and subsequently deemed acceptable by the NYSDEC for admission into the BCP. The former 7543-7555 Niagara Falls Blvd parcel was not part of the BCP application, and is not subject to the Site Management Plan. The historic parcels were merged into one legal parcel addressed as 7515 Niagara Falls Blvd, but the BCP boundary remained the same (see Figure 3).

1.2 Remedial History

The 7503 Niagara Falls Boulevard Site encompasses approximately 0.9 acres of land which was redeveloped as part of a fast food restaurant (Wendy's). Based on the historical use of the site, soil/fill and groundwater were impacted with volatile organic compounds (VOCs) requiring cleanup. Interim Remedial Measures (IRMs) including in-situ groundwater treatment and excavation followed by off-site disposal of contaminated soil/fill were completed at the site. An active sub-slab depressurization system (ASD) system was installed in the newly constructed building and long-term groundwater monitoring was initiated on-site as part of the Site Management Plan (SMP).

1.3 Compliance

At the time of the Site inspection, the Site was fully compliant with the Institutional Controls as stated in the SMP.

1.4 Recommendations

Based on the results of the annual inspection and certification, TurnKey makes the following recommendations for the Site.

- Modification of the certification reporting requirement from annual to triennial (every three years).

Beyond those changes described above, no modifications to the current SMP are recommended at this time.

2.0 SITE OVERVIEW

Beginning in the late 1960s and continuing through the mid-1990s, the Site was occupied by several commercial establishments. These included various restaurants, auto parts sales and auto repair facilities. The property was vacant since approximately 1998.

Prior to remediation, the Site was bounded by Niagara Falls Boulevard to the north, a vacant lot and former apartment buildings to the east (i.e., 7543-7555 Niagara Falls Blvd owned by GLR), private residences to the south, and a commercial (fast-food restaurant) property to the west (i.e., 7403 Niagara Falls Blvd.). A concrete slab remnant from a former building foundation was present across the majority of the western portion of the property. The remainder of the Site was generally covered by asphalt.

Environmental site investigations were conducted at the Site between July 2004 and October 2005, and revealed the presence of certain halogenated volatile organic compounds (VOCs), including tetrachloroethene (PCE); trichloroethene (TCE); cis-1,2-dichloroethene (cis-1,2-DCE); trans-1,2-dichloroethene (trans-1,2-DCE); vinyl chloride (VC); and 1,1,2-trichloroethane (1,1,2-TCA) in on-Site soil and groundwater.

In May 2006, a Brownfield Cleanup Agreement (BCA) was executed by GLR Holdings, LLC with the Department, and remedial efforts under the BCP began in June 2006 with the Remedial Investigation (RI).

Based on the findings of the RI, Interim Remedial Measures (IRMs) were initiated in November 2006. Groundwater treatment utilizing in-situ enhanced bioremediation of impacted groundwater and saturated soils via direct injection of hydrogen releasing compounds (HRC®) into the impacted zones. HRC® is a specially formulated lactic acid-based compound developed by Regenesis Corporation for in-situ treatment of chlorinated VOC contamination in groundwater.

Excavation and off-site disposal of approximately 120-cubic yards (cy) of contaminated soil/fill, and backfilling of excavation with clean material was conducted during redevelopment activities. Remedial activities were completed in October 2007. The RI/AA/IRM report and SMP for the Site were approved by the Department in December 2007. The Certificate of Completion (COC) was issued for the Site in February 2008.

3.0 REMEDY PERFORMANCE

Post-remedial annual site inspections and long-term groundwater monitoring have been completed at the Site in accordance with the SMP since 2008. The Site inspection including a walk-over of the entire BCP Site to visually observe and document the use of the Site for Commercial Use, restriction of groundwater use, operation of the active subslab vapor extraction system, and conformance with the Site Management Plan (SMP). The June 2014 site inspection indicates that the controls are in-place and functioning as intended in accordance with the SMP. The completed IC/EC Certification form and site photographs are included in Appendix A and Appendix B, respectively.

4.0 SITE MANAGEMENT PLAN

A SMP was prepared for the Site, and approved by the Department in December 2007. The SMP includes an Operation, Monitoring and Maintenance Plan, a Soil/Fill Management Plan, and a copy of the Environmental Easements. A brief description of the components of the SMP is presented below.

4.1 Operation, Monitoring and Maintenance Plan

The Operation, Monitoring and Maintenance (OM&M) Plan consists of three major components, including the Active Sub-slab Depressurization System (ASD); the Long-Term Groundwater Monitoring (LTGWM) Plan; and the Annual Inspection & Certification Program.

4.1.1 Active Sub-slab Depressurization System

An ASD system was installed within the newly constructed fast food restaurant building. As required by the Department approved SMP, the ASD system must: (1) be operated continuously to provide a negative pressure field; (2) be visually inspected periodically to verify proper operation; and (3) annually inspected and certified that the system is performing properly and remains an effective engineering control (EC).

During the 2013-2014 Annual Site Inspection, the ASD system operation and maintenance was inspected. The system was operating at the time of the inspection with a vacuum reading of 0.5 inches water column (WC) on the magnehelic vacuum gauge

During verification testing of the ASD system operation, it was noted that the indicator light on the system was sporadically malfunctioning. It should be noted that during our inspection of the ASD system, it was relayed by on-Site staff that a broom handle had fallen and dislodged the vacuum tubing, and the indicator light had worked properly in May 2014.

A replacement indicator light assembly will be ordered and installed upon receipt. NYSDEC will be notified upon installation. Benchmark is reviewing options with GLR Holding, LLC to address this recurring issue.

For future reporting periods, a modified ASD Inspection Log is being utilized to reduce paper usage and simplify the monthly inspection process. A copy of the new inspection log is included in Appendix C. Copies of the completed ASD periodic visual inspection logs for the 2013-2014 reporting period are included in Appendix C.

4.1.2 Long-Term Groundwater Monitoring Plan

A Long-Term Groundwater Monitoring (LTGWM) Plan is required to monitor the effectiveness of the source area removals, treatment, and controls implemented in accordance with the Brownfield Cleanup Agreement.

Groundwater monitoring was conducted on June 5, 2014. The total chlorinated VOCs concentrations slightly increased, while the concentrations of trichloroethene, 1,2-dichloroethene, and tetrachloroethene have remained non-detect (ND). The increase in cVOC concentrations is reasonably attributable to the continued reductive dechlorination and attenuation. The annual groundwater monitoring report is included in Appendix D. Continued annual groundwater monitoring is recommended, with the next monitoring event to be conducted in spring 2015.

4.1.3 Annual Inspection and Certification Program

The Annual Inspection and Certification Program outlines the requirements for the Site, to certify and attest that the institutional controls and/or engineering controls employed at the Site are unchanged from the previous certification. The Annual Certification will primarily consist of an annual Site Inspection to complete the auto-generated NYSDEC Institutional and Engineering Controls (IC/EC) Certification Form. The site inspection will verify that the IC/ECs:

- Are in place and effective.
- Are performing as designed.
- That nothing has occurred that would impair the ability of the controls to protect the public health and environment.

- That nothing has occurred that would constitute a violation or failure to comply with any operation and maintenance plan for such controls.

- Access is available to the Site to evaluate continued maintenance of such controls.

A Site Inspection of the property was conducted by a Benchmark Qualified Environmental Professional (QEP) on June 5, 2014. At the time of the inspection, the property was being used as a fast food restaurant (Wendy's), with surface parking, paved walkways and landscaped areas. No observable indication of intrusive activities was noted during the Site Inspection. The restaurant is on municipal water supply, and no observable use of groundwater was noted during the site inspection.

The completed Site Management Periodic Review Report Notice – Institutional and Engineering Controls Certification Form is included in Appendix A. A photolog of the site inspection is included in Appendix B.

4.2 Soil/Fill Management Plan

A Soil/Fill Management Plan (SFMP) was included in the approved-SMP for the Site. The SFMP provides guidelines for the management of soil and fill material during any future intrusive actives.

No intrusive activities requiring management of on-Site soil or fill material; or the placment of backfill materials occurred during the montoring period.

4.3 Engineering and Institutional Control Requirements and Compliance

As detailed in the Environmental Easements, several Institutional and Engineering Controls (IC/ECs) need to be maintained as a requirmement of the BCAs for the Site.

4.3.1 Institutional Controls

- Groundwater-Use Restriction – the use of groundwater for potable and non-potable purposes is prohibited; and

- Land-Use Restriction: The controlled property may be used for commercial and/or industrial use; and
- Implementation of the SMP including the Groundwater Monitoring Plan, Soil/Fill Management Plan, and Monitoring Plan.

4.3.2 Engineering Controls – ASD System

During the 2013-2014 Annual Site Inspection, the ASD system operation and maintenance was inspected. The system was operating at the time of the inspection with a vacuum reading of 0.5 inches water column (WC) on the magnehelic vacuum gauge.

During verification testing of the ASD system operation, it was noted that the indicator light on the system was sporadically malfunctioning. It should be noted that during our inspection of the ASD system, it was relayed by on-Site staff that a broom handle had fallen and dislodged the vacuum tubing, and the indicator light had worked properly in May 2014. Benchmark is reviewing options with GLR Holding, LLC to address this recurring issue.

5.0 CONCLUSIONS AND RECOMMENDATIONS

Conclusions and recommendations are as follows:

- At the time of the site inspection, the Site was in compliance with the Site Management Plan.

The following modifications are recommended for the Site:

- Modification of the certification reporting requirement from annual to triennial (every three years).

6.0 DECLARATION/LIMITATION

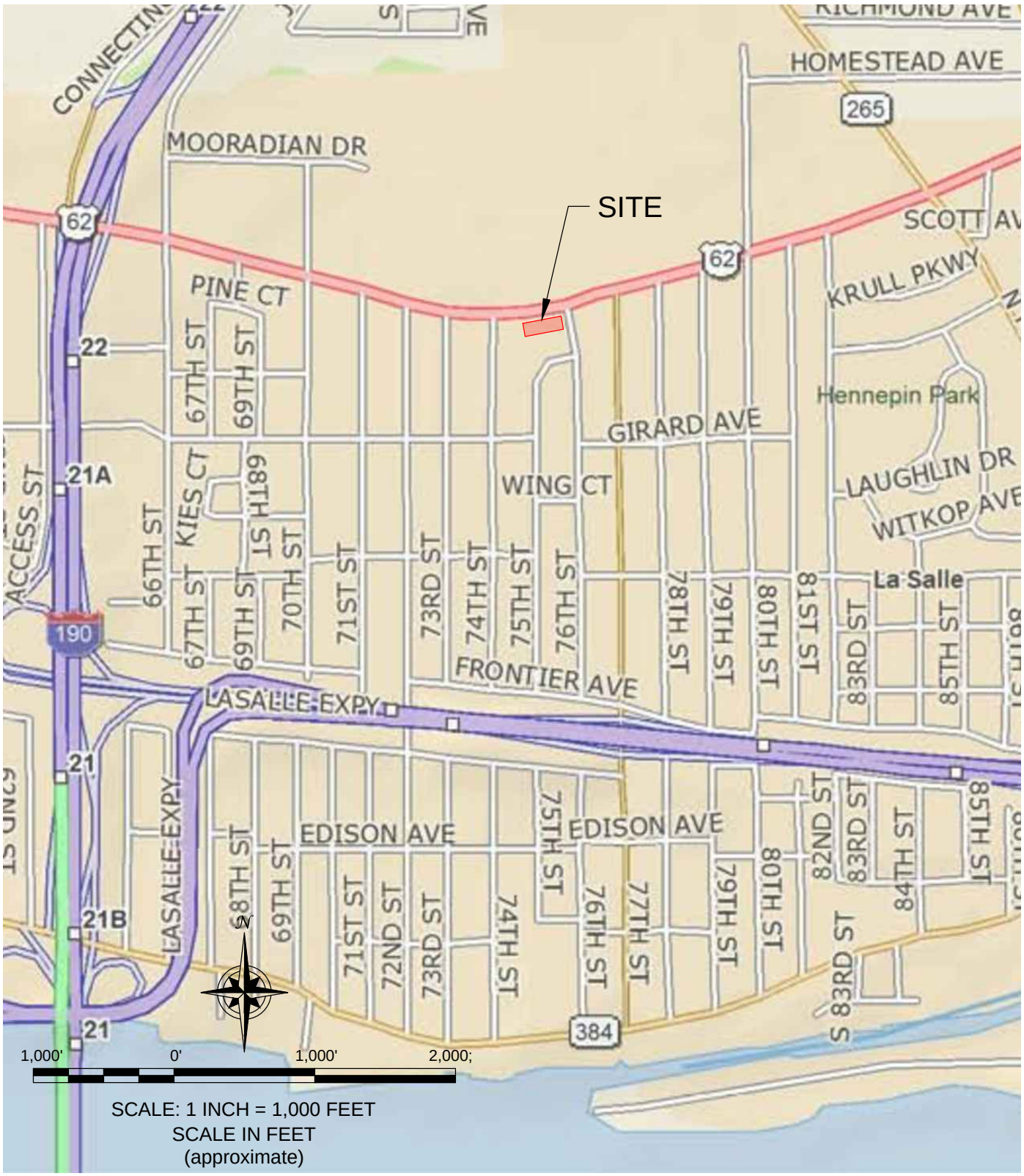
Benchmark Environmental Engineering and Science, PLLC, personnel conducted the annual site inspections for Brownfield Cleanup Program Site No. C932126, located in Niagara Falls, New York, according to generally accepted practices. This report complied with the scope of work provided to GLR Holdings, LLC.

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

FIGURES

F:\CAD\Benchmark\GLR Holdings - Wendy's\Periodic Review Report\2013\Figure 1; Site Location and Vicinity Map.dwg

FIGURE 1



BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

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

PROJECT NO.: 0101-013-001

DATE: JUNE 2013

DRAFTED BY: JGT

SITE LOCATION AND VICINITY MAP

PERIODIC REVIEW REPORT

7503 NIAGARA FALLS BOULEVARD SITE

NIAGARA FALLS, NEW YORK

PREPARED FOR

GLR HOLDINGS, LLC

F:\CAD\Benchmark\GLR Holdings - Wendy's\Periodic Review Report (2013)\Figure 2-Site Map (Pre).dwg

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

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

PROJECT NO.: 0101-013-001

DATE: MAY 2010

DRAFTED BY: AJZ/NTM

SITE MAP (PRE-REMEDIATION)

PERIODIC REVIEW REPORT

7503 NIAGARA FALLS BOULEVARD SITE

NIAGARA FALLS, NEW YORK

PREPARED FOR

GLR HOLDINGS, LLC

FIGURE 2

F:\CAD\Benchmark\GLR Holdings - Wendy's\Periodic Review Report\2012\Figure 3; Site Map (Post).dwg

FIGURE 3

LEGEND:

- BCP PROPERTY BOUNDARY
- REVISED PARCEL BOUNDARY
- PARCEL BOUNDARY
- WENDY'S STORE & PAVEMENT

60' 0' 60' 120'

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

N

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

PROJECT NO.: 0101-013-001
DATE: MAY 2010
DRAFTED BY: BCH/NTM

SITE PLAN (POST-REMEDIATION)

PERIODIC REVIEW REPORT

7503 NIAGARA FALLS BOULEVARD SITE

NIAGARA FALLS, NEW YORK

PREPARED FOR

GLR HOLDINGS, LLC

APPENDIX A

INSTITUTIONAL & ENGINEERING CONTROLS CERTIFICATION FORM

Enclosure 2

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

Site Details **Box 1**

Site No. **C932126**

Site Name 7503 Niagara Falls Blvd.

Site Address: 7515 Niagara Falls Blvd Zip Code: 14302
City/Town: Niagara Falls
County: Niagara
Site Acreage: 0.9

Reporting Period: May 16, 2013 to May 16, 2014

	YES	NO
1. Is the information above correct?	☒	☐
If NO, include handwritten above or on a separate sheet.		
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?	☐	☒
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	☐	☒
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	☐	☒
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.		
5. Is the site currently undergoing development?	☐	☒

Box 2

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial	☒	☐
7. Are all ICs/ECs in place and functioning as designed?	☒	☐

IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

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

Signature of Owner, Remedial Party or Designated Representative

Date

Box 2A

	YES	NO
8. Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?	☐	☒
9. Are the assumptions in the Qualitative Exposure Assessment still valid? (The Qualitative Exposure Assessment must be certified every five years)	☒	☐

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

If you answered NO to question 9, the Periodic Review Report must include an updated Qualitative Exposure Assessment based on the new assumptions.

SITE NO. C932126

Box 3

Description of Institutional Controls

Parcel	Owner	Institutional Control
160.12-2-5	GLR Holdings, LLC	Site Management Plan Monitoring Plan O&M Plan Ground Water Use Restriction Landuse Restriction

Institutional Controls: The following controls apply to the use of the Controlled Property, run with the land, are binding on the Grantor and the Grantor's successors and assigns, and are enforceable in law or equity against any owner of the Controlled Property, any lessees, and any person using the Controlled Property:

A. The Controlled Property may be used for commercial or industrial use as long as the following long-term engineering controls are employed:

1. Excavations below site cover materials must be performed in accordance with applicable provisions of the Soil Fill Management section(s) of the 7503 Niagara Falls Blvd. Site Management Plan, dated October 2007 ("SMP") (or subsequent revisions thereof). Soil and fill below the cover materials must be handled and disposed in accordance with the SIVIP. Soil and fill material from off-site sources which is proposed for use as backfill must meet applicable provisions of the SMP.

2. Site groundwater quality will be periodically monitored according to the provisions of the Groundwater Monitoring Program section(s) of the SMP. The groundwater monitoring well(s) will be maintained and sampled, and the data reported in accordance with the provisions of the SMP.

The Grantor hereby acknowledges receipt of a copy of the NYSDEC-approved SMP dated October 2007. The SMP describes obligations that Grantor assumes on behalf of Grantor, its successors and assigns. The Grantor's assumption of the obligations contained in the SMP which may include sampling, monitoring, and/or operating a treatment system on the Controlled Property, and providing certified reports to the NYSDEC, is and remains a fundamental element of the Department's determination that the Controlled Property is safe for a specific use, but not all uses. Upon notice of not less than thirty (30) days the Department in exercise of its discretion and consistent with applicable law may revise the SMP. This notice shall be a final agency determination. The Grantor and all successors and assigns, assume the burden of complying with the SMP and obtaining an up-to-date version of the SMP from:

Regional Remediation Engineer
Region 9
NYSDEC
270 Michigan Avenue
Buffalo, NY 14203-2999

or

Site Control Section
Division of Environmental Remediation
NYSDEC
625 Broadway
Albany, NY 12233

B. The Controlled Property may not be used for a higher level of use such as unrestricted, residential, or restricted residential use and the above-stated engineering controls may not be discontinued without an amendment or extinguishment of this Environmental Easement.

C. Grantor covenants and agrees that until such time as the Environmental Easement is extinguished in accordance with the requirements of Article 71, Title 36 of the ECL, the property deed and all subsequent instruments of conveyance relating to the Controlled Property shall state in at least fifteen-point bold-faced type:

This property is subject to an environmental easement held by the New York State Department of Environmental Conservation pursuant to Title 36 of Article 71 of the Environmental Conservation Law.

D. Grantor covenants and agrees that this Environmental Easement shall be incorporated in full or by reference in any leases, licenses, or other instruments granting a right to use the Controlled Property.

E. Grantor covenants and agrees that it shall annually, or such time as NYSDEC may allow, submit to NYSDEC a written statement by an expert the NYSDEC may find acceptable certifying under penalty of perjury that the controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls employed at the Controlled Property were approved by the NYSDEC, and that nothing has occurred that would impair the ability of such control to protect the public health and environment or constitute a violation or failure to comply with any Site Management Plan for such controls and giving access to such Controlled Property to evaluate continued maintenance of such controls.

Description of Engineering Controls **Box 4**

Parcel
160.12-2-5

Engineering Control

Vapor Mitigation

1. Site surfaces will be constructed and maintained appropriately to prevent contact with potentially contaminated soils or groundwater. Various site cover materials (stone, concrete, asphalt pavement, vegetated soil, landscaping, etc) may function as a barrier to prevent human contact with contaminated site soils or groundwater.

2. An active sub-slab depressurization (ASD) system under the building floor controls potential releases of contaminated soil vapors into the building indoor air. This ASD system will be tested, and as long as the building is occupied (or as otherwise directed by the New York State Departments of Environmental Conservation and Health), will be continuously operated and maintained in accordance with the provisions of the SMP.

As required by the Department approved SMP, the ASD system must: (1) be operated continuously to provide a negative pressure field; (2) be visually inspected periodically to verify proper operation; (3) annually inspected and certified that the system is performing properly and remains an effective engineering control(EC).

Box 5

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

   a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

   b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and compete.

YES	NO
☒	☐

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

   (a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

   (b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

   (c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

   (d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

   (e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES	NO
☒	☐

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

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

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. C932126

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1,2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Richard C. Fox (print name) at 20 N. Union St. Rochester, NY 14607 (print business address)

am certifying as Owner (Owner or Remedial Party)

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

Richard C. Fox

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

6/27/14
Date

IC/EC CERTIFICATIONS

Qualified Environmental Professional Signature — Box 7

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Michael Lesakowski (print name) at 2558 Hamburg Turnpike, Buffalo NY 14218 (print business address)

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

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

Stamp (Required for PE)

6/30/14
Date

APPENDIX B

SITE PHOTLOG

SITE PHOTOGRAPHS

Photo 1:

Photo 2:

Photo 3:

Photo 4:

Photo 1: East face of building (Looking West)

Photo 2: North side of property (Looking West)

Photo 3: South side of building (Looking East)

Photo 4: North side of property (Looking East)

0101-013-001

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

SITE PHOTOGRAPHS

Photo 5:

Photo 6:

Photo 7:

Photo 8:

Photo 5: North face of building (Looking East)

Photo 6: Southeast corner of property side of property (Looking Southwest)

Photo 7: ASD System Inspection

Photo 8: ASD System gauge Inspection

0101-013-001

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

APPENDIX C

ASD PERIODIC VISUAL INSPECTION LOGS

GLR Holdings - Wendys (C932126)
ASD System Inspection Log

Date	Time	Inspector's Initials	ASD-1 (in.WC)	Notes:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Eric | Date/Time: 7/9/2013

Notes:

Monthly Operating Status:

System(s) currently running? X yes ☐ no

Has the system been off-line in the past month? ☐ yes X no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 15

Visual Inspection:

Any piping disconnected?	☐ yes	X no
Any cracks visible in piping?	☐ yes	X no
Any new cracks visible in slab floor?	☐ yes	X no
Magnehelic guage reading 0?	☐ yes	X no

If yes to any question above, please provide more information below.

Change in Occupancy / Use of Space:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Please indicate general use of floor space?

Has this general use changed in the past month? ☐ yes ☑ No

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes

If so, please list with date:

NO

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Ernie | Date/Time: 6/3/2013

Notes:

Monthly Operating Status:

System(s) currently running? X yes ☐ no

Has the system been off-line in the past month? ☐ yes X no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 50

Visual Inspection:

Any piping disconnected?	☐ yes	no ✓
Any cracks visible in piping?	☐ yes	no ✓
Any new cracks visible in slab floor?	☐ yes	no ✓
Magnehelic guage reading 0?	☐ yes	no ✓ ☐ no

If yes to any question above, please provide more information below.

Change in Occupancy / Use of Space:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Please indicate general use of floor space? _____

Has this general use changed in the past month? ☐ yes ☑ no NO

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☑ NO

If so, please list with date:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: GCR | Date/Time: 9-12/13

Notes:

Monthly Operating Status:

System(s) currently running? ☑ yes ☐ no

Has the system been off-line in the past month? ☐ yes ☑ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? -50

Visual Inspection:

Any piping disconnected?	☐ yes	☑ no
Any cracks visible in piping?	☐ yes	☑ no
Any new cracks visible in slab floor?	☐ yes	☑ no
Magnehelic guage reading 0?	☐ yes	☑ no

If yes to any question above, please provide more information below.

Change in Occupancy / Use of Space:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Please indicate general use of floor space? _____

Has this general use changed in the past month? ☐ yes ☒ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☒ no

If so, please list with date:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name:	Project No.:
Project Location:	Client:
Preparer's Name: Eric M	Date/Time: 10-2-2013

Notes:

Monthly Operating Status:

System(s) currently running? ☑ yes ☐ no

Has the system been off-line in the past month? ☐ yes ☑ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? .148

Visual Inspection:

Any piping disconnected?	☐ yes	☑ no
Any cracks visible in piping?	☐ yes	☑ no
Any new cracks visible in slab floor?	☐ yes	☑ no
Magnehelic guage reading 0?	☐ yes	☑ no

If yes to any question above, please provide more information below.

Change in Occupancy / Use of Space:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Please indicate general use of floor space? _____

Has this general use changed in the past month? ☐ yes ☒ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☒ no

If so, please list with date:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name:	Project No.:
Project Location:	Client:
Preparer's Name: Eric	Date/Time: 11-11-2013

Notes:

Monthly Operating Status:

System(s) currently running? ✓ yes ☐ no

Has the system been off-line in the past month? ☐ yes no ☒ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? -50

Visual Inspection:

Any piping disconnected?	☐ yes	no ☒ no
Any cracks visible in piping?	☐ yes	no ☒ no
Any new cracks visible in slab floor?	☐ yes	no ☒ no
Magnehelic guage reading 0?	☐ yes	no ☒ no

If yes to any question above, please provide more information below.

Change in Occupancy / Use of Space:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Please indicate general use of floor space?

Has this general use changed in the past month? ☐ yes ☒ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☒ no

If so, please list with date:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: 12/07/2013 | Date/Time: Error

Notes:

Monthly Operating Status:

System(s) currently running? X yes ☐ no

Has the system been off-line in the past month? ☐ yes X no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? ~50

Visual Inspection:

Any piping disconnected?	☐ yes	no X no
Any cracks visible in piping?	☐ yes	no X no
Any new cracks visible in slab floor?	☐ yes	no X no
Magnehelic guage reading 0?	☐ yes	no X no

If yes to any question above, please provide more information below.

Change in Occupancy / Use of Space:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Please indicate general use of floor space?

Has this general use changed in the past month? ☐ yes ☑ no
NO

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes

NO

If so, please list with date:

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name:

Project No.:

Project Location:

Client:

Preparer's Name: Matthew Beeson

Date/Time: 1/12/2014

Notes:

Monthly Operating Status:

System(s) currently running? X yes ☐ no

Has the system been off-line in the past month? ☒ yes ☐ no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 25

Visual Inspection:

Any piping disconnected?	☐ yes	no X no
Any cracks visible in piping?	☐ yes	no X no
Any new cracks visible in slab floor?	☐ yes	no X no
Magnehelic guage reading 0?	☐ yes	no X no

If yes to any question above, please provide more information below.

Change in Occupancy / Use of Space:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Matthew Brennan | Date/Time: 2/10/14

Notes:

Monthly Operating Status:

System(s) currently running? X yes ☐ no

Has the system been off-line in the past month? ☐ yes no X no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? -.52

Visual Inspection:

Any piping disconnected?	☐ yes	no X no
Any cracks visible in piping?	☐ yes	no X no
Any new cracks visible in slab floor?	☐ yes	no X no
Magnehelic guage reading 0?	☐ yes	no X no

If yes to any question above, please provide more information below.

Change in Occupancy / Use of Space:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Please indicate general use of floor space? _____

Has this general use changed in the past month? ☐ yes ☒ no NO

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☒ NO

If so, please list with date:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Matthews-Brennan | Date/Time: 3/5/14

Notes:

Monthly Operating Status:

System(s) currently running? X yes ☐ no

Has the system been off-line in the past month? ☐ yes no X

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 25

Visual Inspection:

Any piping disconnected?	☐ yes	no X
Any cracks visible in piping?	☐ yes	no X
Any new cracks visible in slab floor?	☐ yes	no X
Magnehelic guage reading 0?	☐ yes	no X

If yes to any question above, please provide more information below.

Change in Occupancy / Use of Space:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Please indicate general use of floor space? _____

Has this general use changed in the past month? ☐ yes ☒ no N/O

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☒ N/O

If so, please list with date:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: _____ Project No.: _____

Project Location: _____ Client: _____

Preparer's Name: Matthew Brennan Date/Time: 4/7/14

Notes:

Monthly Operating Status:

System(s) currently running? X yes ☐ no

Has the system been off-line in the past month? ☐ yes X no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? -.25

Visual Inspection:

Any piping disconnected?	☐ yes	no X
Any cracks visible in piping?	☐ yes	no X
Any new cracks visible in slab floor?	☐ yes	no X
Magnehelic guage reading 0?	☐ yes	no X

If yes to any question above, please provide more information below.

Change in Occupancy / Use of Space:

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Please indicate general use of floor space? _____

Has this general use changed in the past month? ☐ yes ☒ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☒ no

If so, please list with date:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Project Name: | Project No.:

Project Location: | Client:

Preparer's Name: Matthew Brennan | Date/Time: 5/13/14

Notes:

Monthly Operating Status:

System(s) currently running? X yes ☐ no

Has the system been off-line in the past month? ☐ yes no X no

If yes, please list the dates and brief description why (i.e. maintenance, part replacement, etc.):

What is the current Vacuum reading? 25

Visual Inspection:

Any piping disconnected?	☐ yes	no X no
Any cracks visible in piping?	☐ yes	no X no
Any new cracks visible in slab floor?	☐ yes	no X no
Magnehelic guage reading 0?	☐ yes	no X no

If yes to any question above, please provide more information below.

Change in Occupancy / Use of Space:

BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

Monthly Operation & Maintenance Log
Active Sub-Slab Depressurization System

Please indicate general use of floor space?

Has this general use changed in the past month? ☐ yes ☒ no

If yes, please explain:

System Modifications:

Have any modifications been made to the Sub-Slab Depressurization System? ☐ yes ☒ no

If so, please list with date:

APPENDIX D

GROUNDWATER MONITORING REPORT

BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

June 16, 2014

Mr. Brian Sadowski
NYSDEC Region 9
270 Michigan Ave.
Buffalo, New York 14203-2999

Re: Annual Groundwater Monitoring Results
7503 Niagara Falls Blvd. Site
BCP Site No: C932126

Dear Mr. Sadowski:

On behalf of our client, GLR Holdings, LLC, Benchmark Environmental Engineering & Science, PLLC (Benchmark) in association with TurnKey Environmental Restoration, LLC (TurnKey) has prepared this correspondence related to long term groundwater monitoring of MW-14R. Groundwater sampling was performed on June 5, 2014 at the Wendy's Restaurant at 7503 Niagara Falls Boulevard, Niagara Falls, NY (see Figures 1 & 2).

Sampling was performed in accordance with the Site Management Plan (SMP) by a qualified environmental professional. Analytical results are summarized on Table 1 and the laboratory analytical data report is included in Attachment #1.

The analytical results indicate that the concentrations for trichloroethene, 1,2-dichlorethene, and tetrachlorethene has remained non-detect (ND). The concentration of vinyl chloride has increased slightly. The increase in cVOC concentrations is reasonably attributable to the continued reductive dechlorination and attenuation of source material.

Continued annual monitoring is recommended with the next groundwater monitoring event to be conducted during spring 2015.

Please contact us with any questions.

Sincerely,
Benchmark Environmental Engineering & Science, PLLC

Michael Lesakowski
Project Manager

c. Greg Barkstrom, GLR Holdings, LLC

File: 0101-013-001

TABLE

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

TABLE 1

SUMMARY OF CHLORINATED VOCs GROUNDWATER ANALYTICAL DATA

Long Term Groundwater Monitoring
7503 Niagara Falls Boulevard Site

Parameter [1]	GWQS/GV [3]	MW-14 / MW-14R											
		Baseline [2] (MW-14)	DEC 06 (MW-14)	JAN 07 (MW-14)	MAR 07 (MW-14)	JUN 07 (MW-14)	APR 08 (MW-14R)	MAY 09 (MW-14R)	APR 10 (MW-14R)	APR 11 (MW-14R)	JUN 12 (MW-14R)	JUN 13 (MW-14R)	JUN 14 (MW-14R)
Vinyl chloride	2	910 D	380	150	320	540	150 D	ND	1600 D	1600 D	3800	3900	5300
1,2-Dichloroethane	0.6	ND	ND	ND	ND	ND	ND	ND	1.4	1.1	ND	ND	ND
1,1-Dichloroethene	5	85 D	140	21 J	21 J	60 J	3.9 J	ND	22	11	26 J	30 J	20 J
Trichloroethene	5	540 D	1500	300	150	330	10	ND	3.4	3.2	ND	ND	ND
Tetrachloroethene	5	640	480	120	98	35	ND	ND	ND	ND	ND	ND	ND
trans-1,2-Dichloroethene	5	1300 D	520	240	500	1500	30	ND	110 D	44	100	120 J	64 J
cis-1,2-Dichloroethene	5	1100 D	570	220	370	850	310 D	ND	1200 D	930 D	2500	2700	2700
Total cVOCs	NA	4575	3590	1051	1459	3315	504	ND	2937	2589	6426	6750	8084

Notes:

1. Only chlorinated volatile organic compounds (cVOCs) are shown.
2. Baseline concentrations were collected in June 2006. Hydrogen Release Compound (HRC) injection was completed in November 2006.
3. NYSDEC Class "GA" Groundwater Quality Standards/Guidance Values (GWQS/GV), 6 NYCRR Part 703.
4. Concentrations are in micrograms per liter (ug/L).

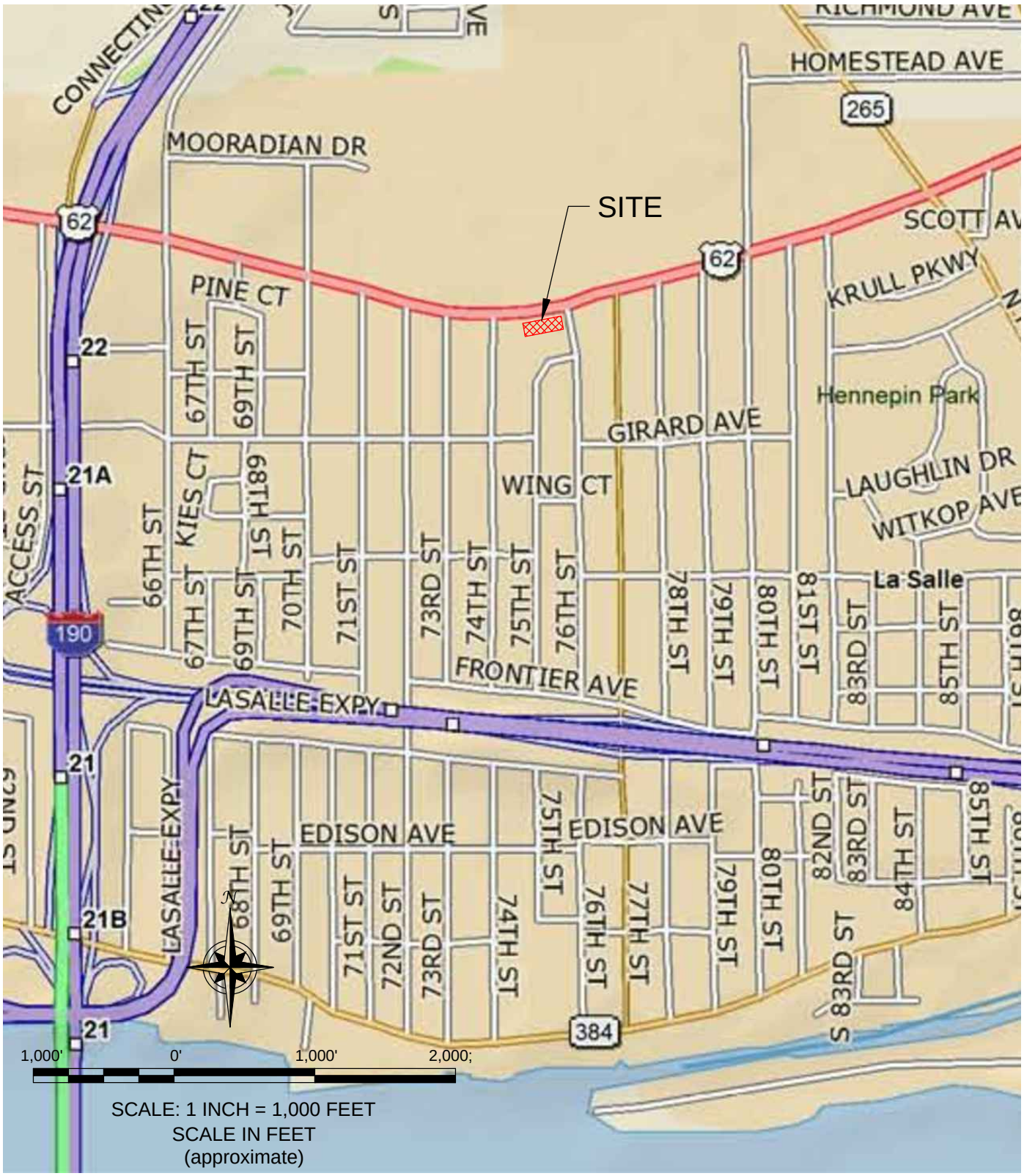
Definitions:

J = Estimated value; result is less than the sample quantitation limit but greater than zero.
D = Diluted sample result.
ND = parameter not detected above laboratory detection limit.
NA = Not Applicable

FIGURES

F:\CAD\Benchmark\GLR Holdings - Wendy's\LTGWM\2012\Figure 1; Site Location and Vicinity Map.dwg

FIGURE 1



BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

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

PROJECT NO.: 0101-012-001

DATE: JULY 2012

DRAFTED BY: JGT

SITE LOCATION AND VICINITY MAP

LONG-TERM GROUNDWATER MONITORING PLAN

7503 NIAGARA FALLS BOULEVARD SITE

NIAGARA FALLS, NEW YORK

PREPARED FOR

GLR HOLDINGS, LLC

F:\CAD\Benchmark\GLR Holdings - Wendy's\LTGWM\2012\Figure 2; Site Plan.dwg

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

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

PROJECT NO.: 0101-012-001

DATE: JULY 2012

DRAFTED BY: JGT

SITE PLAN

LONG-TERM GROUNDWATER MONITORING PLAN

7503 NIAGARA FALLS BOULEVARD SITE

NIAGARA FALLS, NEW YORK

PREPARED FOR

GLR HOLDINGS, LLC

FIGURE 2

ATTACHMENT 1

Laboratory Analytical Data Package

ANALYTICAL REPORT

Lab Number:	L1412272
Client:	Benchmark & Turnkey Companies 2558 Hamburg Turnpike Suite 300 Buffalo, NY 14218
ATTN:	Mike Lesakowski
Phone:	(716) 856-0599
Project Name:	61 R HOLDINGS-WENDYS
Project Number:	Not Specified
Report Date:	06/12/14

Certifications & Approvals: MA (M-MA086), NY (11148), CT (PH-0574), NH (2003), NJ NELAP (MA935), RI (LAO00065), ME (MA00086), PA (68-03671), USDA (Permit #P-330-11-00240), NC (666), TX (T104704476), DOD (L2217), US Army Corps of Engineers.

Eight Walkup Drive, Westborough, MA 01581-1019
508-898-9220 (Fax) 508-898-9193 800-624-9220 - www.alphalab.com

Project Name: 61 R HOLDINGS-WENDYS
Project Number: Not Specified

Lab Number: L1412272
Report Date: 06/12/14

Alpha Sample ID	Client ID	Sample Location	Collection Date/Time
L1412272-01	MW-14R	NIAGARA FALLS	06/05/14 12:37

Project Name: 61 R HOLDINGS-WENDYS
Project Number: Not Specified
Lab Number: L1412272
Report Date: 06/12/14

Case Narrative

The samples were received in accordance with the Chain of Custody and no significant deviations were encountered during the preparation or analysis unless otherwise noted. Sample Receipt, Container Information, and the Chain of Custody are located at the back of the report.

Results contained within this report relate only to the samples submitted under this Alpha Lab Number and meet all of the requirements of NELAC, for all NELAC accredited parameters. The data presented in this report is organized by parameter (i.e. VOC, SVOC, etc.). Sample specific Quality Control data (i.e. Surrogate Spike Recovery) is reported at the end of the target analyte list for each individual sample, followed by the Laboratory Batch Quality Control at the end of each parameter. If a sample was re-analyzed or re-extracted due to a required quality control corrective action and if both sets of data are reported, the Laboratory ID of the re-analysis or re-extraction is designated with an "R" or "RE", respectively. When multiple Batch Quality Control elements are reported (e.g. more than one LCS), the associated samples for each element are noted in the grey shaded header line of each data table. Any Laboratory Batch, Sample Specific % recovery or RPD value that is outside the listed Acceptance Criteria is bolded in the report. Performance criteria for CAM and RCP methods allow for some LCS compound failures to occur and still be within method compliance. In these instances, the specific failures are not narrated but are noted in the associated QC table. This information is also incorporated in the Data Usability format for our Data Merger tool where it can be reviewed along with any associated usability implications. Soil/sediments, solids and tissues are reported on a dry weight basis unless otherwise noted. Definitions of all data qualifiers and acronyms used in this report are provided in the Glossary located at the back of the report.

In reference to questions H (CAM) or 4 (RCP) when "NO" is checked, the performance criteria for CAM and RCP methods allow for some quality control failures to occur and still be within method compliance. In these instances the specific failure is not narrated but noted in the associated QC table. The information is also incorporated in the Data Usability format of our Data Merger tool where it can be reviewed along with any associated usability implications.

Please see the associated ADEx data file for a comparison of laboratory reporting limits that were achieved with the regulatory Numerical Standards requested on the Chain of Custody.

HOLD POLICY
For samples submitted on hold, Alpha's policy is to hold samples (with the exception of Air canisters) free of charge for 21 calendar days from the date the project is completed. After 21 calendar days, we will dispose of all samples submitted including those put on hold unless you have contacted your Client Service Representative and made arrangements for Alpha to continue to hold the samples. Air canisters will be disposed after 3 business days from the date the project is completed.

Please contact Client Services at 800-624-9220 with any questions.

Project Name: 61 R HOLDINGS-WENDYS **Lab Number:** L1412272
Project Number: Not Specified **Report Date:** 06/12/14

Case Narrative (continued)

Report Submission

All non-detect (ND) or estimated concentrations (J-qualified) have been quantitated to the limit noted in the MDL column.

I, the undersigned, attest under the pains and penalties of perjury that, to the best of my knowledge and belief and based upon my personal inquiry of those responsible for providing the information contained in this analytical report, such information is accurate and complete. This certificate of analysis is not complete unless this page accompanies any and all pages of this report.

Authorized Signature: Michelle M. Morris

Title: Technical Director/Representative Date: 06/12/14

ORGANICS

VOLATILES

Project Name: 61 R HOLDINGS-WENDYS **Lab Number:** L1412272

Project Number: Not Specified **Report Date:** 06/12/14

SAMPLE RESULTS

Lab ID:	L1412272-01	D2	Date Collected:	06/05/14 12:37
Client ID:	MW-14R		Date Received:	06/05/14
Sample Location:	NIAGARA FALLS		Field Prep:	Not Specified
Matrix:	Water			
Analytical Method:	1,8260C			
Analytical Date:	06/11/14 16:59			
Analyst:	PD			

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor
Volatile Organics by GC/MS - Westborough Lab						
Vinyl chloride	5300		ug/l	100	33.	100

Surrogate	% Recovery	Qualifier	Acceptance Criteria
1,2-Dichloroethane-d4	106		70-130
Toluene-d8	97		70-130
4-Bromofluorobenzene	93		70-130
Dibromofluoromethane	110		70-130

Project Name: 61 R HOLDINGS-WENDYS **Lab Number:** L1412272

Project Number: Not Specified **Report Date:** 06/12/14

SAMPLE RESULTS

Lab ID: L1412272-01 D
Client ID: MW-14R
Sample Location: NIAGARA FALLS
Matrix: Water
Analytical Method: 1,8260C
Analytical Date: 06/10/14 20:30
Analyst: PD

Date Collected: 06/05/14 12:37
Date Received: 06/05/14
Field Prep: Not Specified

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor
Volatile Organics by GC/MS - Westborough Lab						
Methylene chloride	ND		ug/l	62	18.	25
1,1-Dichloroethane	ND		ug/l	62	18.	25
Chloroform	ND		ug/l	62	18.	25
Carbon tetrachloride	ND		ug/l	12	3.4	25
1,2-Dichloropropane	ND		ug/l	25	3.3	25
Dibromochloromethane	ND		ug/l	12	3.7	25
1,1,2-Trichloroethane	ND		ug/l	38	12.	25
Tetrachloroethene	ND		ug/l	12	4.5	25
Chlorobenzene	ND		ug/l	62	18.	25
Trichlorofluoromethane	ND		ug/l	62	18.	25
1,2-Dichloroethane	ND		ug/l	12	3.3	25
1,1,1-Trichloroethane	ND		ug/l	62	18.	25
Bromodichloromethane	ND		ug/l	12	4.8	25
trans-1,3-Dichloropropene	ND		ug/l	12	4.1	25
cis-1,3-Dichloropropene	ND		ug/l	12	3.6	25
Bromoform	ND		ug/l	50	16.	25
1,1,2,2-Tetrachloroethane	ND		ug/l	12	3.6	25
Benzene	ND		ug/l	12	4.0	25
Toluene	ND		ug/l	62	18.	25
Ethylbenzene	ND		ug/l	62	18.	25
Chloromethane	ND		ug/l	62	18.	25
Bromomethane	ND		ug/l	62	18.	25
Vinyl chloride	5700	E	ug/l	25	8.2	25
Chloroethane	ND		ug/l	62	18.	25
1,1-Dichloroethene	20		ug/l	12	3.5	25
trans-1,2-Dichloroethene	64		ug/l	62	18.	25
Trichloroethene	ND		ug/l	12	4.4	25
1,2-Dichlorobenzene	ND		ug/l	62	18.	25
1,3-Dichlorobenzene	ND		ug/l	62	18.	25
1,4-Dichlorobenzene	ND		ug/l	62	18.	25
Methyl tert butyl ether	ND		ug/l	62	18.	25

Project Name: 61 R HOLDINGS-WENDYS **Lab Number:** L1412272

Project Number: Not Specified **Report Date:** 06/12/14

SAMPLE RESULTS

Lab ID: L1412272-01 D Date Collected: 06/05/14 12:37

Client ID: MW-14R Date Received: 06/05/14

Sample Location: NIAGARA FALLS Field Prep: Not Specified

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor
Volatile Organics by GC/MS - Westborough Lab						
p/m-Xylene	ND		ug/l	62	18.	25
o-Xylene	ND		ug/l	62	18.	25
cis-1,2-Dichloroethene	2700		ug/l	62	18.	25
Styrene	ND		ug/l	62	18.	25
Dichlorodifluoromethane	ND		ug/l	120	25.	25
Acetone	ND		ug/l	120	25.	25
Carbon disulfide	ND		ug/l	120	25.	25
2-Butanone	ND		ug/l	120	25.	25
4-Methyl-2-pentanone	ND		ug/l	120	25.	25
2-Hexanone	ND		ug/l	120	25.	25
Bromochloromethane	ND		ug/l	62	18.	25
1,2-Dibromoethane	ND		ug/l	50	16.	25
1,2-Dibromo-3-chloropropane	ND		ug/l	62	18.	25
Isopropylbenzene	ND		ug/l	62	18.	25
1,2,3-Trichlorobenzene	ND		ug/l	62	18.	25
1,2,4-Trichlorobenzene	ND		ug/l	62	18.	25
Methyl Acetate	ND		ug/l	50	5.8	25
Cyclohexane	ND		ug/l	250	6.1	25
1,4-Dioxane	ND		ug/l	6200	1000	25
Freon-113	ND		ug/l	62	18.	25
Methyl cyclohexane	ND		ug/l	250	7.2	25

Surrogate	% Recovery	Qualifier	Acceptance Criteria
1,2-Dichloroethane-d4	120		70-130
Toluene-d8	95		70-130
4-Bromofluorobenzene	95		70-130
Dibromofluoromethane	111		70-130

Project Name: 61 R HOLDINGS-WENDYS **Lab Number:** L1412272

Project Number: Not Specified **Report Date:** 06/12/14

Method Blank Analysis
Batch Quality Control

Analytical Method: 1,8260C
Analytical Date: 06/10/14 10:36
Analyst: PD

Parameter	Result	Qualifier	Units	RL	MDL
Volatile Organics by GC/MS - Westborough Lab for sample(s): 01 Batch: WG696610-3					
Methylene chloride	ND		ug/l	2.5	0.70
1,1-Dichloroethane	ND		ug/l	2.5	0.70
Chloroform	ND		ug/l	2.5	0.70
Carbon tetrachloride	ND		ug/l	0.50	0.13
1,2-Dichloropropane	ND		ug/l	1.0	0.13
Dibromochloromethane	ND		ug/l	0.50	0.15
1,1,2-Trichloroethane	ND		ug/l	1.5	0.50
Tetrachloroethene	ND		ug/l	0.50	0.18
Chlorobenzene	ND		ug/l	2.5	0.70
Trichlorofluoromethane	ND		ug/l	2.5	0.70
1,2-Dichloroethane	ND		ug/l	0.50	0.13
1,1,1-Trichloroethane	ND		ug/l	2.5	0.70
Bromodichloromethane	ND		ug/l	0.50	0.19
trans-1,3-Dichloropropene	ND		ug/l	0.50	0.16
cis-1,3-Dichloropropene	ND		ug/l	0.50	0.14
Bromoform	ND		ug/l	2.0	0.65
1,1,2,2-Tetrachloroethane	ND		ug/l	0.50	0.14
Benzene	ND		ug/l	0.50	0.16
Toluene	ND		ug/l	2.5	0.70
Ethylbenzene	ND		ug/l	2.5	0.70
Chloromethane	ND		ug/l	2.5	0.70
Bromomethane	ND		ug/l	2.5	0.70
Vinyl chloride	ND		ug/l	1.0	0.33
Chloroethane	ND		ug/l	2.5	0.70
1,1-Dichloroethene	ND		ug/l	0.50	0.14
trans-1,2-Dichloroethene	ND		ug/l	2.5	0.70
Trichloroethene	ND		ug/l	0.50	0.17
1,2-Dichlorobenzene	ND		ug/l	2.5	0.70
1,3-Dichlorobenzene	ND		ug/l	2.5	0.70
1,4-Dichlorobenzene	ND		ug/l	2.5	0.70
Methyl tert butyl ether	ND		ug/l	2.5	0.70

Project Name: 61 R HOLDINGS-WENDYS **Lab Number:** L1412272

Project Number: Not Specified **Report Date:** 06/12/14

Method Blank Analysis
Batch Quality Control

Analytical Method: 1,8260C
Analytical Date: 06/10/14 10:36
Analyst: PD

Parameter	Result	Qualifier	Units	RL	MDL
Volatile Organics by GC/MS - Westborough Lab for sample(s): 01 Batch: WG696610-3					
p/m-Xylene	ND		ug/l	2.5	0.70
o-Xylene	ND		ug/l	2.5	0.70
cis-1,2-Dichloroethene	ND		ug/l	2.5	0.70
Styrene	ND		ug/l	2.5	0.70
Dichlorodifluoromethane	ND		ug/l	5.0	1.0
Acetone	ND		ug/l	5.0	1.0
Carbon disulfide	ND		ug/l	5.0	1.0
2-Butanone	ND		ug/l	5.0	1.0
4-Methyl-2-pentanone	ND		ug/l	5.0	1.0
2-Hexanone	ND		ug/l	5.0	1.0
Bromochloromethane	ND		ug/l	2.5	0.70
1,2-Dibromoethane	ND		ug/l	2.0	0.65
1,2-Dibromo-3-chloropropane	ND		ug/l	2.5	0.70
Isopropylbenzene	ND		ug/l	2.5	0.70
1,2,3-Trichlorobenzene	ND		ug/l	2.5	0.70
1,2,4-Trichlorobenzene	ND		ug/l	2.5	0.70
Methyl Acetate	ND		ug/l	2.0	0.23
Cyclohexane	ND		ug/l	10	0.24
1,4-Dioxane	ND		ug/l	250	41.
Freon-113	ND		ug/l	2.5	0.70
Methyl cyclohexane	ND		ug/l	10	0.29

Surrogate	%Recovery	Qualifier	Acceptance Criteria
1,2-Dichloroethane-d4	111		70-130
Toluene-d8	97		70-130
4-Bromofluorobenzene	94		70-130
Dibromofluoromethane	103		70-130

Project Name: 61 R HOLDINGS-WENDYS **Lab Number:** L1412272

Project Number: Not Specified **Report Date:** 06/12/14

Method Blank Analysis
Batch Quality Control

Analytical Method: 1,8260C
Analytical Date: 06/11/14 11:41
Analyst: PD

Parameter	Result	Qualifier	Units	RL	MDL
Volatile Organics by GC/MS - Westborough Lab for sample(s): 01 Batch: WG696610-6					
Methylene chloride	ND		ug/l	2.5	0.70
1,1-Dichloroethane	ND		ug/l	2.5	0.70
Chloroform	ND		ug/l	2.5	0.70
Carbon tetrachloride	ND		ug/l	0.50	0.13
1,2-Dichloropropane	ND		ug/l	1.0	0.13
Dibromochloromethane	ND		ug/l	0.50	0.15
1,1,2-Trichloroethane	ND		ug/l	1.5	0.50
Tetrachloroethene	ND		ug/l	0.50	0.18
Chlorobenzene	ND		ug/l	2.5	0.70
Trichlorofluoromethane	ND		ug/l	2.5	0.70
1,2-Dichloroethane	ND		ug/l	0.50	0.13
1,1,1-Trichloroethane	ND		ug/l	2.5	0.70
Bromodichloromethane	ND		ug/l	0.50	0.19
trans-1,3-Dichloropropene	ND		ug/l	0.50	0.16
cis-1,3-Dichloropropene	ND		ug/l	0.50	0.14
Bromoform	ND		ug/l	2.0	0.65
1,1,2,2-Tetrachloroethane	ND		ug/l	0.50	0.14
Benzene	ND		ug/l	0.50	0.16
Toluene	ND		ug/l	2.5	0.70
Ethylbenzene	ND		ug/l	2.5	0.70
Chloromethane	ND		ug/l	2.5	0.70
Bromomethane	ND		ug/l	2.5	0.70
Vinyl chloride	ND		ug/l	1.0	0.33
Chloroethane	ND		ug/l	2.5	0.70
1,1-Dichloroethene	ND		ug/l	0.50	0.14
trans-1,2-Dichloroethene	ND		ug/l	2.5	0.70
Trichloroethene	ND		ug/l	0.50	0.17
1,2-Dichlorobenzene	ND		ug/l	2.5	0.70
1,3-Dichlorobenzene	ND		ug/l	2.5	0.70
1,4-Dichlorobenzene	ND		ug/l	2.5	0.70
Methyl tert butyl ether	ND		ug/l	2.5	0.70

Project Name: 61 R HOLDINGS-WENDYS **Lab Number:** L1412272

Project Number: Not Specified **Report Date:** 06/12/14

Method Blank Analysis
Batch Quality Control

Analytical Method: 1,8260C
Analytical Date: 06/11/14 11:41
Analyst: PD

Parameter	Result	Qualifier	Units	RL	MDL
Volatile Organics by GC/MS - Westborough Lab for sample(s): 01 Batch: WG696610-6					
p/m-Xylene	ND		ug/l	2.5	0.70
o-Xylene	ND		ug/l	2.5	0.70
cis-1,2-Dichloroethene	ND		ug/l	2.5	0.70
Styrene	ND		ug/l	2.5	0.70
Dichlorodifluoromethane	ND		ug/l	5.0	1.0
Acetone	ND		ug/l	5.0	1.0
Carbon disulfide	ND		ug/l	5.0	1.0
2-Butanone	ND		ug/l	5.0	1.0
4-Methyl-2-pentanone	ND		ug/l	5.0	1.0
2-Hexanone	ND		ug/l	5.0	1.0
Bromochloromethane	ND		ug/l	2.5	0.70
1,2-Dibromoethane	ND		ug/l	2.0	0.65
1,2-Dibromo-3-chloropropane	ND		ug/l	2.5	0.70
Isopropylbenzene	ND		ug/l	2.5	0.70
1,2,3-Trichlorobenzene	ND		ug/l	2.5	0.70
1,2,4-Trichlorobenzene	ND		ug/l	2.5	0.70
Methyl Acetate	ND		ug/l	2.0	0.23
Cyclohexane	ND		ug/l	10	0.24
1,4-Dioxane	ND		ug/l	250	41.
Freon-113	ND		ug/l	2.5	0.70
Methyl cyclohexane	ND		ug/l	10	0.29

Surrogate	%Recovery	Qualifier	Acceptance Criteria
1,2-Dichloroethane-d4	113		70-130
Toluene-d8	92		70-130
4-Bromofluorobenzene	92		70-130
Dibromofluoromethane	106		70-130

Lab Control Sample Analysis

Batch Quality Control

Project Name: 61 R HOLDINGS-WENDYS

Project Number: Not Specified

Lab Number: L1412272

Report Date: 06/12/14

Parameter	LCS %Recovery	Qual	LCSD %Recovery	Qual	%Recovery Limits	RPD	Qual	RPD Limits
Volatile Organics by GC/MS - Westborough Lab Associated sample(s): 01 Batch: WG696610-1 WG696610-2								
Methylene chloride	111		109		70-130	2		20
1,1-Dichloroethane	114		112		70-130	2		20
Chloroform	111		111		70-130	0		20
2-Chloroethylvinyl ether	92		85		70-130	8		20
Carbon tetrachloride	104		108		63-132	4		20
1,2-Dichloropropane	113		110		70-130	3		20
Dibromochloromethane	102		101		63-130	1		20
1,1,2-Trichloroethane	117		111		70-130	5		20
Tetrachloroethene	104		108		70-130	4		20
Chlorobenzene	109		109		75-130	0		20
Trichlorofluoromethane	95		92		62-150	3		20
1,2-Dichloroethane	118		114		70-130	3		20
1,1,1-Trichloroethane	101		106		67-130	5		20
Bromodichloromethane	116		111		67-130	4		20
trans-1,3-Dichloropropene	109		105		70-130	4		20
cis-1,3-Dichloropropene	103		102		70-130	1		20
1,1-Dichloropropene	101		108		70-130	7		20
Bromoform	88		85		54-136	3		20
1,1,2,2-Tetrachloroethane	101		98		67-130	3		20
Benzene	106		110		70-130	4		20
Toluene	105		108		70-130	3		20

Lab Control Sample Analysis

Batch Quality Control

Project Name: 61 R HOLDINGS-WENDYS

Project Number: Not Specified

Lab Number: L1412272

Report Date: 06/12/14

Parameter	LCS %Recovery	Qual	LCSD %Recovery	Qual	%Recovery Limits	RPD	Qual	RPD Limits
Volatile Organics by GC/MS - Westborough Lab Associated sample(s): 01 Batch: WG696610-1 WG696610-2								
Ethylbenzene	113		111		70-130	2		20
Chloromethane	110		103		64-130	7		20
Bromomethane	77		82		39-139	6		20
Vinyl chloride	121		125		55-140	3		20
Chloroethane	106		102		55-138	4		20
1,1-Dichloroethene	99		95		61-145	4		20
trans-1,2-Dichloroethene	107		107		70-130	0		20
Trichloroethene	107		107		70-130	0		20
1,2-Dichlorobenzene	106		103		70-130	3		20
1,3-Dichlorobenzene	104		104		70-130	0		20
1,4-Dichlorobenzene	104		105		70-130	1		20
Methyl tert butyl ether	98		98		63-130	0		20
p/m-Xylene	121		119		70-130	2		20
o-Xylene	119		121		70-130	2		20
cis-1,2-Dichloroethene	110		109		70-130	1		20
Dibromomethane	125		117		70-130	7		20
1,2,3-Trichloropropane	98		98		64-130	0		20
Acrylonitrile	112		97		70-130	14		20
Isopropyl Ether	107		105		70-130	2		20
tert-Butyl Alcohol	89		85		70-130	5		20
Styrene	124		123		70-130	1		20

Lab Control Sample Analysis

Batch Quality Control

Project Name: 61 R HOLDINGS-WENDYS

Project Number: Not Specified

Lab Number: L1412272

Report Date: 06/12/14

Parameter	LCS %Recovery	Qual	LCSD %Recovery	Qual	%Recovery Limits	RPD	Qual	RPD Limits
Volatile Organics by GC/MS - Westborough Lab Associated sample(s): 01 Batch: WG696610-1 WG696610-2								
Dichlorodifluoromethane	82		73		36-147	12		20
Acetone	109		88		58-148	**21**	Q	20
Carbon disulfide	102		96		51-130	6		20
2-Butanone	130		112		63-138	15		20
Vinyl acetate	123		109		70-130	12		20
4-Methyl-2-pentanone	104		94		59-130	10		20
2-Hexanone	98		90		57-130	9		20
Bromochloromethane	95		99		70-130	4		20
2,2-Dichloropropane	106		105		63-133	1		20
1,2-Dibromoethane	107		104		70-130	3		20
1,3-Dichloropropane	114		106		70-130	7		20
1,1,1,2-Tetrachloroethane	113		110		64-130	3		20
Bromobenzene	99		101		70-130	2		20
n-Butylbenzene	110		110		53-136	0		20
sec-Butylbenzene	103		106		70-130	3		20
tert-Butylbenzene	100		103		70-130	3		20
o-Chlorotoluene	106		109		70-130	3		20
p-Chlorotoluene	102		106		70-130	4		20
1,2-Dibromo-3-chloropropane	94		88		41-144	7		20
Hexachlorobutadiene	98		96		63-130	2		20
Isopropylbenzene	96		101		70-130	5		20

Lab Control Sample Analysis

Batch Quality Control

Project Name: 61 R HOLDINGS-WENDYS

Project Number: Not Specified

Lab Number: L1412272

Report Date: 06/12/14

Parameter	LCS %Recovery	Qual	LCSD %Recovery	Qual	%Recovery Limits	RPD	Qual	RPD Limits
Volatile Organics by GC/MS - Westborough Lab Associated sample(s): 01 Batch: WG696610-1 WG696610-2								
p-Isopropyltoluene	105		107		70-130	2		20
Naphthalene	98		86		70-130	13		20
n-Propylbenzene	102		106		69-130	4		20
1,2,3-Trichlorobenzene	98		88		70-130	11		20
1,2,4-Trichlorobenzene	96		90		70-130	6		20
1,3,5-Trimethylbenzene	107		108		64-130	1		20
1,2,4-Trimethylbenzene	105		106		70-130	1		20
Methyl Acetate	120		110		70-130	9		20
Ethyl Acetate	116		103		70-130	12		20
Cyclohexane	100		108		70-130	8		20
Ethyl-Tert-Butyl-Ether	100		99		70-130	1		20
Tertiary-Amyl Methyl Ether	98		99		66-130	1		20
1,4-Dioxane	91		98		56-162	7		20
Freon-113	111		110		70-130	1		20
1,4-Diethylbenzene	109		110		70-130	1		20
4-Ethyltoluene	104		105		70-130	1		20
1,2,4,5-Tetramethylbenzene	103		103		70-130	0		20
Ethyl ether	108		100		59-134	8		20
trans-1,4-Dichloro-2-butene	87		88		70-130	1		20
Methyl cyclohexane	104		106		70-130	2		20

Lab Control Sample Analysis

Batch Quality Control

Project Name: 61 R HOLDINGS-WENDYS

Project Number: Not Specified

Lab Number: L1412272

Report Date: 06/12/14

Parameter	LCS %Recovery	Qual	LCSD %Recovery	Qual	%Recovery Limits	RPD	Qual	RPD Limits
Volatile Organics by GC/MS - Westborough Lab Associated sample(s): 01 Batch: WG696610-1 WG696610-2								

Surrogate	LCS %Recovery	Qual	LCSD %Recovery	Qual	Acceptance Criteria
1,2-Dichloroethane-d4	107		106		70-130
Toluene-d8	97		101		70-130
4-Bromofluorobenzene	90		96		70-130
Dibromofluoromethane	104		108		70-130

Lab Control Sample Analysis

Batch Quality Control

Project Name: 61 R HOLDINGS-WENDYS

Project Number: Not Specified

Lab Number: L1412272

Report Date: 06/12/14

Parameter	LCS %Recovery	Qual	LCSD %Recovery	Qual	%Recovery Limits	RPD	Qual	RPD Limits
Volatile Organics by GC/MS - Westborough Lab Associated sample(s): 01 Batch: WG696610-4 WG696610-5								
Methylene chloride	115		95		70-130	19		20
1,1-Dichloroethane	118		97		70-130	20		20
Chloroform	116		96		70-130	19		20
2-Chloroethylvinyl ether	87		87		70-130	0		20
Carbon tetrachloride	111		103		63-132	7		20
1,2-Dichloropropane	115		109		70-130	5		20
Dibromochloromethane	93		93		63-130	0		20
1,1,2-Trichloroethane	102		98		70-130	4		20
Tetrachloroethene	109		104		70-130	5		20
Chlorobenzene	105		103		75-130	2		20
Trichlorofluoromethane	91		80		62-150	13		20
1,2-Dichloroethane	120		113		70-130	6		20
1,1,1-Trichloroethane	111		99		67-130	11		20
Bromodichloromethane	116		107		67-130	8		20
trans-1,3-Dichloropropene	96		95		70-130	1		20
cis-1,3-Dichloropropene	105		95		70-130	10		20
1,1-Dichloropropene	116		102		70-130	13		20
Bromoform	81		78		54-136	4		20
1,1,2,2-Tetrachloroethane	93		92		67-130	1		20
Benzene	118		109		70-130	8		20
Toluene	103		96		70-130	7		20

Lab Control Sample Analysis

Batch Quality Control

Project Name: 61 R HOLDINGS-WENDYS

Project Number: Not Specified

Lab Number: L1412272

Report Date: 06/12/14

Parameter	LCS %Recovery	Qual	LCSD %Recovery	Qual	%Recovery Limits	RPD	Qual	RPD Limits
Volatile Organics by GC/MS - Westborough Lab Associated sample(s): 01 Batch: WG696610-4 WG696610-5								
Ethylbenzene	110		106		70-130	4		20
Chloromethane	124		107		64-130	15		20
Bromomethane	92		79		39-139	15		20
Vinyl chloride	**152**	Q	132		55-140	14		20
Chloroethane	106		96		55-138	10		20
1,1-Dichloroethene	95		80		61-145	17		20
trans-1,2-Dichloroethene	111		86		70-130	**25**	Q	20
Trichloroethene	108		105		70-130	3		20
1,2-Dichlorobenzene	101		96		70-130	5		20
1,3-Dichlorobenzene	100		96		70-130	4		20
1,4-Dichlorobenzene	102		98		70-130	4		20
Methyl tert butyl ether	102		84		63-130	19		20
p/m-Xylene	116		113		70-130	3		20
o-Xylene	115		112		70-130	3		20
cis-1,2-Dichloroethene	116		92		70-130	**23**	Q	20
Dibromomethane	118		110		70-130	7		20
1,2,3-Trichloropropane	95		90		64-130	5		20
Acrylonitrile	109		90		70-130	19		20
Isopropyl Ether	115		95		70-130	19		20
tert-Butyl Alcohol	84		79		70-130	6		20
Styrene	118		112		70-130	5		20

Lab Control Sample Analysis

Batch Quality Control

Project Name: 61 R HOLDINGS-WENDYS

Project Number: Not Specified

Lab Number: L1412272

Report Date: 06/12/14

Parameter	LCS %Recovery	Qual	LCSD %Recovery	Qual	%Recovery Limits	RPD	Qual	RPD Limits
Volatile Organics by GC/MS - Westborough Lab Associated sample(s): 01 Batch: WG696610-4 WG696610-5								
Dichlorodifluoromethane	85		70		36-147	19		20
Acetone	100		88		58-148	13		20
Carbon disulfide	100		81		51-130	**21**	Q	20
2-Butanone	115		91		63-138	**23**	Q	20
Vinyl acetate	111		97		70-130	13		20
4-Methyl-2-pentanone	102		92		59-130	10		20
2-Hexanone	85		82		57-130	4		20
Bromochloromethane	98		80		70-130	20		20
2,2-Dichloropropane	114		87		63-133	**27**	Q	20
1,2-Dibromoethane	98		96		70-130	2		20
1,3-Dichloropropane	102		102		70-130	0		20
1,1,1,2-Tetrachloroethane	105		103		64-130	2		20
Bromobenzene	99		95		70-130	4		20
n-Butylbenzene	107		101		53-136	6		20
sec-Butylbenzene	104		98		70-130	6		20
tert-Butylbenzene	102		97		70-130	5		20
o-Chlorotoluene	104		101		70-130	3		20
p-Chlorotoluene	100		95		70-130	5		20
1,2-Dibromo-3-chloropropane	82		84		41-144	2		20
Hexachlorobutadiene	98		93		63-130	5		20
Isopropylbenzene	100		96		70-130	4		20

Lab Control Sample Analysis
Batch Quality Control

Project Name: 61 R HOLDINGS-WENDYS
Project Number: Not Specified

Lab Number: L1412272
Report Date: 06/12/14

Parameter	LCS %Recovery	Qual	LCSD %Recovery	Qual	%Recovery Limits	RPD	Qual	RPD Limits
Volatile Organics by GC/MS - Westborough Lab Associated sample(s): 01 Batch: WG696610-4 WG696610-5								
p-Isopropyltoluene	105		98		70-130	7		20
Naphthalene	83		84		70-130	1		20
n-Propylbenzene	104		96		69-130	8		20
1,2,3-Trichlorobenzene	88		87		70-130	1		20
1,2,4-Trichlorobenzene	91		89		70-130	2		20
1,3,5-Trimethylbenzene	108		102		64-130	6		20
1,2,4-Trimethylbenzene	103		100		70-130	3		20
Methyl Acetate	115		99		70-130	15		20
Ethyl Acetate	112		96		70-130	15		20
Cyclohexane	116		102		70-130	13		20
Ethyl-Tert-Butyl-Ether	108		89		70-130	19		20
Tertiary-Amyl Methyl Ether	102		97		66-130	5		20
1,4-Dioxane	112		100		56-162	11		20
Freon-113	111		93		70-130	18		20
1,4-Diethylbenzene	107		103		70-130	4		20
4-Ethyltoluene	105		96		70-130	9		20
1,2,4,5-Tetramethylbenzene	102		97		70-130	5		20
Ethyl ether	98		87		59-134	12		20
trans-1,4-Dichloro-2-butene	80		80		70-130	0		20
Methyl cyclohexane	117		106		70-130	10		20

Lab Control Sample Analysis

Batch Quality Control

Project Name: 61 R HOLDINGS-WENDYS

Project Number: Not Specified

Lab Number: L1412272

Report Date: 06/12/14

Parameter	LCS %Recovery	Qual	LCSD %Recovery	Qual	%Recovery Limits	RPD	Qual	RPD Limits
Volatile Organics by GC/MS - Westborough Lab Associated sample(s): 01 Batch: WG696610-4 WG696610-5								

Surrogate	LCS %Recovery	Qual	LCSD %Recovery	Qual	Acceptance Criteria
1,2-Dichloroethane-d4	110		104		70-130
Toluene-d8	95		91		70-130
4-Bromofluorobenzene	93		90		70-130
Dibromofluoromethane	110		91		70-130

Project Name: 61 R HOLDINGS-WENDYS
Project Number: Not Specified

Lab Number: L1412272
Report Date: 06/12/14

Sample Receipt and Container Information

Were project specific reporting limits specified? YES

Reagent H2O Preserved Vials Frozen on: NA

Cooler Information **Custody Seal**

Cooler	
A	Absent

Container Information

Container ID	Container Type	Cooler	pH	Temp deg C	Pres	Seal	Analysis(*)
L1412272-01A	Vial HCl preserved	A	N/A	3.0	Y	Absent	NYTCL-8260(14)
L1412272-01B	Vial HCl preserved	A	N/A	3.0	Y	Absent	NYTCL-8260(14)
L1412272-01C	Vial HCl preserved	A	N/A	3.0	Y	Absent	NYTCL-8260(14)

*Values in parentheses indicate holding time in days

Project Name:	61 R HOLDINGS-WENDYS	**Lab Number:**	L1412272
Project Number:	Not Specified	**Report Date:**	06/12/14

GLOSSARY

Acronyms

EDL	- Estimated Detection Limit: This value represents the level to which target analyte concentrations are reported as estimated values, when those target analyte concentrations are quantified below the reporting limit (RL). The EDL includes any adjustments from dilutions, concentrations or moisture content, where applicable. The use of EDLs is specific to the analysis of PAHs using Solid-Phase Microextraction (SPME).
EPA	- Environmental Protection Agency.
LCS	- Laboratory Control Sample: A sample matrix, free from the analytes of interest, spiked with verified known amounts of analytes or a material containing known and verified amounts of analytes.
LCSD	- Laboratory Control Sample Duplicate: Refer to LCS.
LFB	- Laboratory Fortified Blank: A sample matrix, free from the analytes of interest, spiked with verified known amounts of analytes or a material containing known and verified amounts of analytes.
MDL	- Method Detection Limit: This value represents the level to which target analyte concentrations are reported as estimated values, when those target analyte concentrations are quantified below the reporting limit (RL). The MDL includes any adjustments from dilutions, concentrations or moisture content, where applicable.
MS	- Matrix Spike Sample: A sample prepared by adding a known mass of target analyte to a specified amount of matrix sample for which an independent estimate of target analyte concentration is available.
MSD	- Matrix Spike Sample Duplicate: Refer to MS.
NA	- Not Applicable.
NC	- Not Calculated: Term is utilized when one or more of the results utilized in the calculation are non-detect at the parameter's reporting unit.
NI	- Not Ignitable.
RL	- Reporting Limit: The value at which an instrument can accurately measure an analyte at a specific concentration. The RL includes any adjustments from dilutions, concentrations or moisture content, where applicable.
RPD	- Relative Percent Difference: The results from matrix and/or matrix spike duplicates are primarily designed to assess the precision of analytical results in a given matrix and are expressed as relative percent difference (RPD). Values which are less than five times the reporting limit for any individual parameter are evaluated by utilizing the absolute difference between the values; although the RPD value will be provided in the report.
SRM	- Standard Reference Material: A reference sample of a known or certified value that is of the same or similar matrix as the associated field samples.

Footnotes

1	- The reference for this analyte should be considered modified since this analyte is absent from the target analyte list of the original method.

Terms

Total: With respect to Organic analyses, a 'Total' result is defined as the summation of results for individual isomers or Aroclors. If a 'Total' result is requested, the results of its individual components will also be reported. This is applicable to 'Total' results for methods 8260, 8081 and 8082.

Analytical Method: Both the document from which the method originates and the analytical reference method. (Example: EPA 8260B is shown as 1,8260B.) The codes for the reference method documents are provided in the References section of the Addendum.

Data Qualifiers

A	- Spectra identified as "Aldol Condensation Product".
B	- The analyte was detected above the reporting limit in the associated method blank. Flag only applies to associated field samples that have detectable concentrations of the analyte at less than ten times (10x) the concentration found in the blank. For MCP-related projects, flag only applies to associated field samples that have detectable concentrations of the analyte at less than ten times (10x) the concentration found in the blank. For DOD-related projects, flag only applies to associated field samples that have detectable concentrations of the analyte at less than ten times (10x) the concentration found in the blank AND the analyte was detected above one-half the reporting limit (or above the reporting limit for common lab contaminants) in the associated method blank. For NJ-Air-related projects, flag only applies to associated field samples that have detectable concentrations of the analyte above the reporting limit.
C	- Co-elution: The target analyte co-elutes with a known lab standard (i.e. surrogate, internal standards, etc.) for co-extracted analyses.
D	- Concentration of analyte was quantified from diluted analysis. Flag only applies to field samples that have detectable concentrations of the analyte.
E	- Concentration of analyte exceeds the range of the calibration curve and/or linear range of the instrument.
G	- The concentration may be biased high due to matrix interferences (i.e, co-elution) with non-target compound(s). The result should be considered estimated.

Report Format: DU Report with 'J' Qualifiers

Project Name:	61 R HOLDINGS-WENDYS	**Lab Number:**	L1412272
Project Number:	Not Specified	**Report Date:**	06/12/14

Data Qualifiers

H - The analysis of pH was performed beyond the regulatory-required holding time of 15 minutes from the time of sample collection.

I - The lower value for the two columns has been reported due to obvious interference.

M - Reporting Limit (RL) exceeds the MCP CAM Reporting Limit for this analyte.

NJ - Presumptive evidence of compound. This represents an estimated concentration for Tentatively Identified Compounds (TICs), where the identification is based on a mass spectral library search.

P - The RPD between the results for the two columns exceeds the method-specified criteria.

Q - The quality control sample exceeds the associated acceptance criteria. For DOD-related projects, LCS and/or Continuing Calibration Standard exceedences are also qualified on all associated sample results. Note: This flag is not applicable for matrix spike recoveries when the sample concentration is greater than 4x the spike added or for batch duplicate RPD when the sample concentrations are less than 5x the RL. (Metals only.)

R - Analytical results are from sample re-analysis.

RE - Analytical results are from sample re-extraction.

S - Analytical results are from modified screening analysis.

J - Estimated value. The Target analyte concentration is below the quantitation limit (RL), but above the Method Detection Limit (MDL) or Estimated Detection Limit (EDL) for SPME-related analyses. This represents an estimated concentration for Tentatively Identified Compounds (TICs).

ND - Not detected at the method detection limit (MDL) for the sample, or estimated detection limit (EDL) for SPME-related analyses.

Report Format: DU Report with 'J' Qualifiers

Project Name: 61 R HOLDINGS-WENDYS
Project Number: Not Specified
Lab Number: L1412272
Report Date: 06/12/14

REFERENCES

1 Test Methods for Evaluating Solid Waste: Physical/Chemical Methods. EPA SW-846. Third Edition. Updates I - IV, 2007.

LIMITATION OF LIABILITIES

Alpha Analytical performs services with reasonable care and diligence normal to the analytical testing laboratory industry. In the event of an error, the sole and exclusive responsibility of Alpha Analytical shall be to re-perform the work at it's own expense. In no event shall Alpha Analytical be held liable for any incidental, consequential or special damages, including but not limited to, damages in any way connected with the use of, interpretation of, information or analysis provided by Alpha Analytical.

We strongly urge our clients to comply with EPA protocol regarding sample volume, preservation, cooling, containers, sampling procedures, holding time and splitting of samples in the field.

Certification Information

Last revised April 15, 2014

The following analytes are not included in our NELAP Scope of Accreditation:

Westborough Facility
EPA 524.2: Acetone, 2-Butanone (Methyl ethyl ketone (MEK)), Tert-butyl alcohol, 2-Hexanone, Tetrahydrofuran, 1,3,5-Trichlorobenzene, 4-Methyl-2-pentanone (MIBK), Carbon disulfide, Diethyl ether.
EPA 8260C: 1,2,4,5-Tetramethylbenzene, 4-Ethyltoluene, Iodomethane (methyl iodide), Methyl methacrylate, Azobenzene.
EPA 8330A/B: PETN, Picric Acid, Nitroglycerine, 2,6-DANT, 2,4-DANT.
EPA 8270D: 1-Methylnaphthalene, Dimethylnaphthalene,1,4-Diphenylhydrazine.
EPA 625: 4-Chloroaniline, 4-Methylphenol.
SM4500: Soil: Total Phosphorus, TKN, NO2, NO3.
EPA 9071: Total Petroleum Hydrocarbons, Oil & Grease.

Mansfield Facility
EPA 8270D: Biphenyl.
EPA 2540D: TSS
EPA TO-15: Halothane, 2,4,4-Trimethyl-2-pentene, 2,4,4-Trimethyl-1-pentene, Thiophene, 2-Methylthiophene, 3-Methylthiophene, 2-Ethylthiophene, 1,2,3-Trimethylbenzene, Indan, Indene, 1,2,4,5-Tetramethylbenzene, Benzothiophene, 1-Methylnaphthalene.

The following analytes are included in our Massachusetts DEP Scope of Accreditation, Westborough Facility:

Drinking Water
EPA 200.8: Sb,As,Ba,Be,Cd,Cr,Cu,Pb,Ni,Se,Tl; **EPA 200.7**: Ba,Be,Ca,Cd,Cr,Cu,Na; **EPA 245.1:** Mercury;
EPA 300.0: Nitrate-N, Fluoride, Sulfate; **EPA 353.2**: Nitrate-N, Nitrite-N; **SM4500NO3-F**: Nitrate-N, Nitrite-N; **SM4500F-C, SM4500CN-CE, EPA 180.1, SM2130B, SM4500Cl-D, SM2320B, SM2540C, SM4500H-B**
EPA 332: Perchlorate.
Microbiology: **SM9215B; SM9223-P/A, SM9223B-Colilert-QT, Enterolert-QT.**

Non-Potable Water
EPA 200.8: Al,Sb,As,Be,Cd,Cr,Cu,Pb,Mn,Ni,Se,Ag,Tl,Zn;
EPA 200.7: Al,Sb,As,Be,Cd,Ca,Cr,Co,Cu,Fe,Pb,Mg,Mn,Mo,Ni,K,Se,Ag,Na,Sr,Ti,Tl,V,Zn;
EPA 245.1, SM4500H,B, EPA 120.1, SM2510B, SM2540C, SM2340B, SM2320B, SM4500CL-E, SM4500F-BC, SM426C, SM4500NH3-BH, **EPA 350.1**: Ammonia-N, **LACHAT 10-107-06-1-B**: Ammonia-N, **SM4500NO3-F, EPA 353.2**: Nitrate-N**, SM4500NH3-BC-NES, EPA 351.1, SM4500P-E, SM4500P-B, E, SM5220D, EPA 410.4, SM5210B, SM5310C, SM4500CL-D, EPA 1664, SM14 510AC, EPA 420.1, SM4500-CN-CE, SM2540D.**
EPA 624: Volatile Halocarbons & Aromatics,
EPA 608: Chlordane, Toxaphene, Aldrin, alpha-BHC, beta-BHC, gamma-BHC, delta-BHC, Dieldrin, DDD, DDE, DDT, Endosulfan I, Endosulfan II, Endosulfan sulfate, Endrin, Endrin Aldehyde, Heptachlor, Heptachlor Epoxide, PCBs
EPA 625: SVOC (Acid/Base/Neutral Extractables), **EPA 600/4-81-045**: PCB-Oil.
Microbiology: **SM9223B-Colilert-QT; Enterolert-QT, SM9222D-MF**.

For a complete listing of analytes and methods, please contact your Alpha Project Manager.

Serial_No:06121416:04

CHAIN OF CUSTODY

PAGE ____ OF ____

ALPHA ANALYTICAL

WESTBORO, MA
TEL: 508-898-9220
FAX: 508-898-9193

MANSFIELD, MA
TEL: 508-822-9300
FAX: 508-822-3288

Date Rec'd in Lab: 6/5/14

ALPHA Job #: L1412272

Client Information

Client: Benchmark Eng

Address: 2558 Hamburg Turnpike
Lackawanna NY 14218

Phone: (716) 818-8358

Fax: (716) 856-0583

Email: TBehrendt@Turnkeyllc.com

☐ These samples have been previously analyzed by Alpha

Project Information

Project Name: GLR Holdings Wendys

Project Location: Niagara Falls

Project #:

Project Manager: Mike Lesakowski

ALPHA Quote #:

Turn-Around Time

☒ Standard ☐ RUSH (only confirmed if pre-approved!)

Date Due: 6/13/14 Time:

Report Information - Data Deliverables

☐ FAX ☐ EMAIL

☒ ADEx ☐ Add'l Deliverables

Billing Information

☐ Same as Client info PO #:

Regulatory Requirements/Report Limits

State /Fed Program	Criteria

Other Project Specific Requirements/Comments/Detection Limits:

ANALYSIS: TCL 8260

SAMPLE HANDLING

Filtration ______
☐ Done
☐ Not needed
☐ Lab to do

Preservation
☐ Lab to do
(Please specify below)

ALPHA Lab ID (Lab Use Only)	Sample ID	Collection Date	Collection Time	Sample Matrix	Sampler's Initials	TCL 8260	Sample Specific Comments	TOTAL # BOTTLES
12272-01	MW-14R	6/5/14	1237	GW	TAB	3		

Container Type	V
Preservative	B

Relinquished By:	Date/Time	Received By:	Date/Time
[signature]	6/5/14 1600	[signature] AAL	6/5/14 1615
[signature]	6/5/14 1830	[signature]	6/5/14 1830
[signature]	6/5/14 2120	[signature]	6/5/14 2120
[signature]	6/5/14 2355	[signature] McClench	6/5/14 2355

Please print clearly, legibly and completely. Samples can not be logged in and turnaround time clock will not start until any ambiguities are resolved. All samples submitted are subject to Alpha's Terms and Conditions. See reverse side.

FORM NO: 01-01 (rev. 14-OCT-07)