

# CONSOLIDATED REMEDIAL INVESTIGATION REPORT

TRACT I SITE  
3123 HIGHLAND AVENUE  
NIAGARA FALLS, NIAGARA COUNTY, NEW YORK  
SITE NO. 932131

SUBMITTED TO:

THE NEW YORK STATE DEPARTMENT  
OF ENVIRONMENTAL CONSERVATION  
DIVISION OF HAZARDOUS WASTE REMEDIATION

*Prepared for:*



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**April 2012**

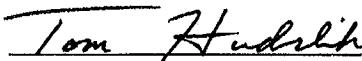
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## **ACRONYMS**

Amec	Amec Environment & Infrastructure, Inc.
RI	Remedial Investigation
Brightfields	Brightfields, Inc.
Site	Tract I Site
City	City of Niagara Falls
USGS	United States Geological Survey
NYSDEC	New York Department of Environmental Conservation
USEPA	United States Environmental Protection Agency
BCP	Brownfield Cleanup Program
Ft-bgs	Feet Below Ground Surface
ROD	Record of Decision
EA	EA Science and Technology
E&E	Ecology and Environment Engineering, P.C.
DUSR	Data Usability Summary Report
TCL	Target Compound List
SVOCs	Semivolatile Organic Compounds
PCBs	Polychlorinated Biphenyls
CLP	Contract Laboratory Program

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TCLP	Toxicity Characteristic Leaching Procedure
PLM	Polarized Light Microscopy
TEM	Transmission Electron Microscopy
COCs	Constituents of Concern
EDR	Environmental Data Resources
TAL	Target Analyte List
VOCs	Volatile Organic Compounds
PID	Photoionization Detector
TOC	Total Organic Carbon
TSS	Total Suspended Solids
NFWB	Niagara Falls Water Board
XRF	X-Ray Fluorescence
TestAmerica	TestAmerica Laboratories
NYCRR	New York Code of Rules and Regulations
SCOs	Soil Cleanup Objectives
PAHs	Polynuclear Aromatic Hydrocarbons
Mg/kg	Milligrams per Kilograms
J	Estimated
Mg/L	Milligrams per Liter
ACM	Asbestos Containing Material
S.U.	Standard Units
Bgs	Below Ground Surface
HHEA	Human Health Exposure Assessment
COPCs	Constituents of Potential Concern
CSM	Conceptual Site Model
FWIA	Fish and Wildlife Impact Analysis
SMP	Site Management Plan

## **1.0 INTRODUCTION**

Amec Environment & Infrastructure, Inc. (Amec) has prepared this Consolidated Remedial Investigation (RI) Report on behalf of Brightfields, Inc. (Brightfields) for the Tract I Site (Site) located at 3123 Highland Avenue, in the City of Niagara Falls (City), Niagara County, New York. Figure 1 shows the location of the Site on a United States Geological Survey (USGS) topographic map and Figure 2 shows the existing layout of the Site in plan view.

The Site is a former lead/acid battery manufacturing plant and has been the subject of site characterization by the New York State Department of Environmental Conservation (NYSDEC) and a Removal Action by the United States Environmental Protection Agency (USEPA) between 1999 and 2010. Adjacent to the Site to the south and east is the Tract II property, which is being remediated under the State of New York Inactive Hazardous Waste Site program.

The City has endeavored to redevelop both the Site and the Tract II property since closure of the industrial facilities in the early 1970's. In order to support a viable redevelopment on the Tract II property, Brightfields has elected to also remediate and redevelop the Site. The Site will be remediated under the New York State Brownfield Cleanup Program (BCP).

### **1.1 PURPOSE OF REPORT**

The purpose of this RI Report is to serve as a consolidated summary of the investigations and remedial actions conducted at the Site to date under NYSDEC and USEPA oversight. This report documents the results and observations from the previous investigations and remedial action, provides a limited qualitative exposure assessment for the Site, and presents recommendations for additional actions (if any) to facilitate redevelopment of the Site.

### **1.2 SITE BACKGROUND**

The following sub sections provide a brief description of the Site location and history along with a physical description of the Site, including geology and hydrology.

## INTRODUCTION

### 1.2.1 Site Location and History

The Site is located at 3123 Highland Avenue in the City of Niagara Falls, New York in a multi-use area comprised of industrial, commercial, and residential properties. The Site consists of approximately 5.9 acres located east of Highland Avenue, north and west of the industrial Tract II property, and south of the active Tulip Corporation (Figures 1 and 2).



The Site was first developed for industrial use in approximately 1910 as the Power City Warehouse, a battery manufacturing facility for U.S. Light and Heat Co., and later Autolite Co. The facility was acquired by Prestolite Co. in the

1960s for the manufacture of hard rubber battery cases along with battery charging and filling. Battery manufacturing activities ceased in the 1970s and the Site was used as a warehouse and an automotive body shop until the 1980s. By the late 1980s, the Site had been abandoned and various portions were in disrepair. At that time, the City acquired the property via tax foreclosure.

### 1.2.2 Site Description

The Site consists of approximately 5.9 acres of property and is mainly covered by the former Power City Warehouse building in various levels of disrepair. The western portion of the Site consists of a grassy area and a gravel drive to the loading dock area. Along the southern boundary of the Site are some trees and undergrowth, along with a segment of a retaining wall. The eastern portion of the Site has some grassy areas intermixed with broken asphalt and sections of concrete pavement.

The Power City Warehouse building covers approximately 3.3 acres of the Site and is a three-story masonry building with a basement area under a portion of the



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structure. The building has had numerous additions to the original structure. Portions of the building roof have collapsed, making several areas of the warehouse building unsafe. Previous investigations of the warehouse building have reported that the majority of the structure is constructed on concrete floors approximately six-inches thick. The concrete floors were noted to be in good condition with no major cracking or deterioration (EA, 2009). Several areas of the warehouse have brick flooring over the concrete floor and drains, and sumps were identified throughout the building.

A second, considerably smaller, one-story building (approximately 462 square feet) is located in the northeast corner of the Site. The smaller building is constructed of brick with a concrete floor. Past investigations have suggested that this building may have been used for chemical storage (E&E, 2000).

The Site consists of roughly 30 percent grass and concrete surface, 15 percent is wooded with undergrowth, and approximately 55 percent contains building structures.

### *1.2.3 Site Geology and Hydrogeology*

The Geologic Map of New York, Niagara Sheet, published by the University of the State of New York indicates that the Site lies within the Silurian-aged Lockport Group. The Lockport Group consists of Geulph, Oak Orchard, Eramosa, and Goat Island Dolostones and the Gasport Limestone. Tract II property investigations have revealed that bedrock is between 12.5 and 23.5 feet below ground surface (ft-bgs) in the vicinity of the Site. The unconsolidated material at the Site consists of various fill materials at the surface, underlain by silty clay. Dolostone bedrock is present below the silty clay.

Although no direct groundwater investigations have been performed on the Site, previous investigations conducted for the NYSDEC on the adjacent Tract II property indicate that there is no significant groundwater aquifer within the overburden soils or fill materials (EA, 2009). Groundwater flow at the Site appears to be generally toward the southwest, toward the Niagara River, on top of the bedrock formation.

The NYSDEC concluded, in the initial Tract II site characterization report, (E&E, 2000) and in the 2003 Tract II Record of Decision (ROD) that groundwater in the

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vicinity of the Site was not likely to be used as drinking water source. The report cited the small amount of water available, a local ordinance prohibiting water supply wells in the City, and the fact that public drinking water is available throughout the area as justification for this conclusion.

### 1.3 SITE INVESTIGATION/REMEDIATION HISTORY

In May 1999, an initial investigation was conducted on the Site by Ecology and Environment Engineering, P.C. (E&E) for the City under a grant from the NYSDEC. Results from this investigation were presented in a May 2000 site investigation report (E&E, 2000). In late 2007, the NYSDEC contracted EA Engineering, P.C. and its affiliate EA Science and Technology (EA) to perform an additional site characterization. Results of that investigation were presented in a May 2009 site characterization report (EA, 2009).

In late 2009 and in 2010, the USEPA conducted a Removal Action at the Site. These activities included fencing the Site, removal/cleanup and disposal of lead-contaminated debris including sediments and sludge from within the warehouse building, and removal and disposal of some asbestos containing building materials from the Site. Additionally, paint-related materials, PCB light ballasts, batteries, mercury switches, piping and other miscellaneous debris located on the Site were removed and disposed of by the USEPA.

In July 2011, Amec implemented a NYSDEC-approved pre-design study work plan (Mactec, 2011) on the Site. This study was performed to refine the extent of lead identified in surface soil at the Site and to obtain additional data to support anticipated Site remediation.

### 1.4 REPORT ORGANIZATION

This report is organized into six sections following this introduction, as follows:

- **Section 2** provides a description of the previous investigations and remedial action performed at the Site.
- **Section 3** provides the results and observations from the previous investigations conducted at the Site.

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- **Section 4** summarizes the analytical results and associated impacts at the Site.
- **Section 5** presents a limited qualitative exposure assessment for the Site.
- **Section 6** presents the conclusions for the investigations performed at the Site and presents recommendations for additional actions.
- **Section 7** provides a list of references cited in this report.

### 1.5 LIMITATIONS

This RI Report presents a summary of information known to Amec concerning the Site that Amec considered pertinent to the scope of work and stated project objectives. Amec has performed this work with the care and skill ordinarily used by members of the profession practicing under similar conditions. The conclusions presented herein are those that are deemed pertinent by Amec based upon the assumed accuracy of the available information. No other warranty, expressed or implied, is made as to the professional advice included in this report. The information present in this report is not intended for any use other than the stated objectives of the project. This document was prepared for the sole use of Brightfields, Inc., Honeywell, Inc., and the NYSDEC, who are the only intended beneficiaries of the work.

## 2.0 SITE INVESTIGATIONS

This section provides a description of previous investigations and remedial work performed at the Site.

### 2.1 SUMMARY OF REMEDIAL INVESTIGATIONS

The Site was investigated in three efforts between 1999 and 2011. These included the 1999 E&E site investigation, the 2007-2008 EA site characterization, and the July 2011 predesign study implemented by Amec. The following subsections summarize the field activities conducted during these three site characterization efforts.

#### ***2.1.1 1999 E&E Site Investigation***

In May 1999, E&E conducted the initial investigation of the Site. According to the E&E report (E&E, 2000), the 1999 site investigation was conducted to characterize the nature and extent of potential Site-related constituents, and consisted of a building inspection and multimedia sampling. The building inspection was performed to determine if petroleum products or other hazardous materials were located in the Site buildings. Due to safety concerns, this inspection was limited to the first floor of the Power City Warehouse building. Sampling activities included the collection of surface soils, sediments, paint chips for lead analysis and building materials for asbestos analysis. These activities are described in further detail below and sample locations from the E&E site investigation are shown on Figure 3.

Samples collected during the E&E site investigation, with the exception of asbestos samples, were submitted to E&E Analytical Services Center for laboratory analysis. Analytical results were subjected to a review to determine data usability, and a Data Usability Summary Report (DUSR) was completed. Results from the E&E site investigation are contained in the “*Site Investigation Report for the Power City Warehouse, Niagara Falls, New York*” (E&E, 2000), and are presented in Section 3.1 of this report.

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### *2.1.1.1 Surface Soil Sampling*

During the 1999 site investigation, 13 (10 composite and three grab) samples that were classified by E&E as surface soil samples, were collected from the Site mainly from within the Power City Warehouse building. Composite and grab samples were collected by room or area and were reportedly collected from the 0 to 0.5 foot depth interval.

Although classified as surface soil samples, several of the samples or sub-samples were collected from within sumps and drains within the building. According to the E&E report, in rooms with highly fractured concrete or brick floors, the concrete was broken or the bricks were removed and sampling was conducted from the underlying soils/material. Additionally, in rooms where floor drains or sumps were present, sampling was conducted from the drains and/or sumps, as well as below brick floors and damaged concrete areas (E&E, 2000).

Of the 13 samples designated as surface soil samples (SS-PCW-01 through SS-PCW-13), only four composite samples (SS-PWC-07, SS-PWC-11, SS-PWC-12 and SS-PWC-13) and two grab samples (SS-PWC-04 and SS-PWC-08) did not include debris material from within sumps or drains (Figure 3).

Eight of the samples collected by E&E were analyzed for target compound list (TCL) semivolatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), and total lead. Of the remaining five samples, two were analyzed for total lead (SS-PCW-04 and SS-PCW-07), two were analyzed for PCBs (SS-PWC-08 and SS-PWC-13), and one sample (SS-PWC-10) was analyzed for TCL SVOCs and PCBs. Additionally, because PCBs were analyzed by Contract Laboratory Program (CLP) Methodologies, pesticides were reported in the PCB samples.

### *2.1.1.2 Background Surface Soil Sampling*

Three background grab surface soil samples were collected from areas near the Site for lead analysis. According to the E&E report, background samples were collected from 0 to 0.5 feet in depth at the following locations:

- Southeast of the corner of Profit Lane and 9<sup>th</sup> Street (sample SS-PCW-BK01),
- North of the Power City Warehouse at the Tulip Corporation yard on Highland Avenue (sample SS-PCW-BK02), and

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- East of the Doris Jones Tennis Courts along Highland Avenue (sample SS-PCW-BK03).

### ***2.1.1.3 Sediment/Sludge Sampling***

One composite sediment/sludge sample and a sample duplicate, consisting of three sub-samples, were obtained by E&E from the central floor drain in the Power City Warehouse building. This sample and duplicate were analyzed for SVOCs, pesticides/PCBs and lead (samples SD-PCW-01 and SD-PCW-01/D).

### ***2.1.1.4 Lead Paint Sampling***

One composite paint chip sample (sample PT-PCW-01) was collected from different color painted chips located in the former Moulding Room. This sample was analyzed for Toxicity Characteristic Leaching Procedure (TCLP) lead.

### ***2.1.1.5 Asbestos Sampling***

Two samples of pipe insulation (AS-PCW-01 and AS-PCW-02) and one sample of roofing material (AS-PCW-03) were collected from the Power City Warehouse building. These samples were analyzed for asbestos by polarized light microscopy (PLM) and by Transmission Electron Microscopy (TEM) for organically bound material.

## ***2.1.2 2007-2008 EA Site Characterization***

EA conducted additional characterization activities at the Site for NYSDEC from September 2007 to October 2008. According to the EA report, the site characterization was performed to characterize known constituents of concern (COCs) at the Site and to determine the extent to which those COCs contribute risks to human health and the environment (EA, 2009). To accomplish this, EA's site characterization consisted of the following activities:

- Historical data and records review;
- Sample location identification and warehouse flooring inspection;
- Debris sampling and debris volume estimation;

## SITE INVESTIGATIONS

- Flooded basement water discharge and basement inspection; and
- Soil boring sampling.

These activities are described in further detail below. Sample locations from the EA site characterization are shown on Figure 4.

Samples collected during the EA site characterization were submitted to Mitkem Corporation located in Warwick, Rhode Island for laboratory analysis. Analytical results from this investigation were supplied to Environmental Data Services, Inc. for review and a DUSR was completed. Results from the EA site characterization are contained in the “*Final Site Characterization Report, Power City Warehouse Site (9-32-131), Niagara Falls, Niagara County, New York*” (EA, 2009) and are discussed in Section 3.2 of this report.

### ***2.1.2.1 Historical Data and Records Review***

EA conducted a historical data and records review of the Site prior to initiating field activities. This assessment included reviewing a radius report map from Environmental Data Resources (EDR) and data provided to EA by the NYSDEC. Additionally, EA contacted several City offices for any other information they could obtain regarding the Site.

### ***2.1.2.2 Sample Location Identification and Warehouse Flooring Inspection***

Based upon the findings of the historical data and records review, EA and the NYSDEC conducted a Site visit to locate debris and soil sampling locations in September of 2007. According to the EA report, sampling locations were field-selected based upon historical operations and areas where sufficient sample volumes could be obtained for analysis.

Prior to debris and soil sampling, EA conducted an inspection of flooring materials throughout the Power City Warehouse building. This inspection was conducted by removing bricks and asphalt from several locations within the warehouse to determine the condition and type of sub-floor materials present. During this inspection, it was observed that brick floors are underlain by a layer of soil/sand on top of a concrete sub-floor. Based upon the condition of the concrete sub-floor and

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concluding that the soil/sand was used as a bedding material for the brick floor, EA and the NYSDEC determined that sampling of the soils/sands located beneath the bricks would not be conducted as part of EA's characterization (EA, 2009).

### ***2.1.2.3 Building Debris Sampling and Debris Volume Estimation***

According to the EA report, on September 12, 2007, 19 debris samples (composite and grab) were collected from locations selected based on results of the historical records review, the warehouse flooring inspection, and in concurrence with the NYSDEC representative. Grab debris samples DS-01, DS-04 through DS-15, DS-17, DS-18, and DS-21 were collected from individual sumps/pits and composite debris samples DS-16, DS-19 and DS-20 were collected from continuous floor drains and trenches from within the Power City Warehouse building (Figure 4).

Debris samples collected by EA were analyzed for SVOCs, target analyte list (TAL) metals and TCLP metals. Additionally, five debris samples (DS-09, DS-13 DS-14, DS-16 and DS-19) were also analyzed for volatile organic compounds (VOCs) based upon photoionization detector (PID) organic vapor field screening results.

During debris sampling activities, volume calculations were also completed for the debris sample collection areas. These volume estimations were completed by EA to calculate the estimated volume of debris located within the floor drains, floor trenches and catch basins (sumps/pits) within the Power City Warehouse building.

### ***2.1.2.4 Flooded Basement Water Discharge and Basement Inspection***

The partial basement located in the northern portion of the Power City Warehouse building was observed by EA to be flooded during debris sampling activities. On June 27, 2008 EA collected one composite sample of the water in the basement for VOCs, SVOCs, TAL metals, total organic carbon (TOC), and total suspended solids (TSS) analyses. This sample was required as part of the industrial discharge permit with the Niagara Falls Water Board (NFWB) to allow EA to discharge the basement water to the sanitary sewer. After issuance of the industrial discharge permit from the NFWB, EA removed water from the basement into the sanitary sewer system from September 15 through September 17, 2008.



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Following basement water removal and discharge, EA inspected the basement and collected one composite sample (BSMT COMPOSITE) from the debris observed in the basement. The composite sample was analyzed for TAL metals.

### *2.1.2.5 Soil Boring Sampling*

On September 30 and October 1, 2008, EA advanced 23 soil borings (SB-01 through SB-23) using direct-push drilling technologies. According to the EA report, 13 of the soil borings were installed within the footprint of the former Power City Warehouse building and 10 borings were installed around the exterior of the structure. To facilitate soil boring installation within the building, a 4-inch coring bit was utilized to core through the concrete floor prior to drilling. Reportedly, continuous soil samples were collected with a macro-core sampler until a confining clay layer was reached. The soil cores were geologically logged and screened with a PID at 1 foot intervals. It should be noted that NYSDEC considers “surface” soil to consist of soil less than 0.5 feet deep. As such, EA reported the 0-2 ft-bgs interval as “subsurface” soil, consistent with NYSDEC policy. Additionally, although 13 of the soil borings were drilled within the building footprint, the samples collected from them are considered building exterior samples for the purposes of this report because they were collected from beneath the building slab.

Thirty-two soil samples were reportedly collected by EA from the 23 soil borings advanced at the Site. However, according to the tables located in the EA report, only 31 samples were collected consisting of the following (Figure 4):

- Twenty-two shallow subsurface soil samples were collected from 0 to 2 ft-bgs and analyzed for TAL metals. Shallow subsurface samples were collected from all of the soil borings, except SB-19.
- Nine deeper subsurface soil samples were collected from depth intervals ranging from three to eight ft-bgs and analyzed for VOCs and SVOCs. These samples were only collected in soil borings from depth intervals that reportedly exhibited elevated PID readings, staining, or odors. These nine samples (with their corresponding sample depth interval) include; SB-01D(6-8), SB-06D(5-6), SB-09D(6-7), SB-12D(6-7), SB-13D(6-7), SB-17(5-6), SB-18(4-7), SB-19(4-7) and SB-23S(3-4).

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### *2.1.3 July 2011 AMEC Pre-design Study*

In July 2011, Amec implemented a NYSDEC-approved Predesign Study Work Plan (Mactec, 2011). This study was performed to refine the extent of metals identified in surface soil surrounding the Power City Warehouse building and to obtain additional data to support anticipated Site remediation.

#### *2.1.3.1 Surface Soil Sampling*

To further delineate metals concentrations in surface soil at the Site, Amec collected 11 grab surface soil samples around the perimeter of the Power City Warehouse building. The locations of these samples are shown on Figure 5 and are described below:

- Six surface soil samples (B-10 through B-15) were collected on the eastern side of the Site (east of the warehouse building) from areas of exposed soil;
- Three surface soil samples (B-16 through B-18) were collected south of the warehouse building and north of the Tract II property; and
- Two surface soil samples (B-19 and B-20) were collected from the grassy area west of the warehouse building and east of Highland Avenue.

The surface soil samples were collected as grab samples using a decontaminated hand auger. Samples were collected from a depth interval of 0 to 0.5 ft-bgs, below any vegetative cover. The surface soil samples were analyzed for metals (antimony, lead and tin) by USEPA SW-846 Method 6010B/6020, TCLP lead by USEPA SW-846 Method 1311/6010B, and pH by USEPA SW-846 Method 9045.

In addition to soil sampling, an Innov-X Alpha Series hand-held X-ray fluorescence (XRF) meter was used to field screen the surface soil sampling locations for the presence of lead and tin. XRF field screening was conducted to measure real-time lead and tin concentrations for later correlation to laboratory results. Due to equipment failure of the XRF, only four surface soil sampling locations (B-10, B-11, B-19 and B-20) were field screened.

All surface soil samples collected during the Amec pre-design study were submitted to TestAmerica Laboratories (TestAmerica) located in Amherst, NY for laboratory

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analysis. After receipt of the analytical data package, data validation was completed by an Amec chemist for Method 6010B/6020 (antimony, lead and tin) and TCLP lead in accordance with the NYSDEC DUSR guidelines (NYSDEC, 2010). Analytical results and a summary of the building evaluation from the Amec pre-design study are presented in Section 3.3 of this report.

### **2.2 SITE REMEDIATION SUMMARY**

In May 2009, the Site was referred to the USEPA by the NYSDEC for potential cleanup. NYSDEC's referral was based upon the threat posed by elevated levels of lead identified in sumps, floor trenches, and drains (debris samples), asbestos containing building materials, and the overall deteriorating condition of the warehouse building. As a result of the referral, USEPA conducted an assessment of the Site and approved funding to secure the Site from direct access. This included a fencing and security action at the Site that was implemented in November 2009.

In late March 2010, USEPA approved additional funding for a Removal Action to remediate lead containing materials, asbestos materials, and other hazardous substances within the warehouse building. These activities were conducted from May to November 2010 and included the removal, cleanup and disposal of a significant amount of lead-contaminated debris, sediments and sludge from within the warehouse building, removal and disposal of water in the building basement, and removal and disposal of some asbestos containing building materials from the Site. Additionally, paint-related materials, PCB light ballasts, batteries, mercury switches, piping, and other miscellaneous debris located in the warehouse building were removed and disposed of by the USEPA.

According to the USEPA Pollution Reports from this Remedial Action, cleanup activities did not take place in areas of the warehouse building that were deemed unsafe due to deteriorating building conditions. The portions of the warehouse building addressed and not addressed by the USEPA are shown on Figure 2. USEPA Pollution Reports detailing the cleanup work activities are included in Appendix A.

## 3.0 SITE INVESTIGATION RESULTS

This section provides observations and results from the three investigations conducted at the Site. Based upon the City's Master Plan to redevelop the Site for commercial use, analytical results presented in this section are compared to 6 New York Code of Rules and Regulations (NYCRR) Part 375 Soil Cleanup Objectives (SCOs) for "Restricted Commercial" use (hereafter referred to as "Commercial SCOs").

### 3.1 E&E SITE INVESTIGATION RESULTS

Results of the May 1999 E&E site investigation are contained in the "*Site Investigation Report for the Power City Warehouse, Niagara Falls, New York*" (E&E, 2000) and are summarized below. Table 1 is an analytical summary table of sample detections from this investigation, with Commercial SCOs listed for comparison to analytical results. Sample locations from the E&E investigation are shown on Figure 3, and Figure 6 provides a pictorial summary of analytical results detected above Commercial SCOs.

#### 3.1.1 Surface Soil Sampling Results

During the E&E Site investigation 13 surface soil samples (10 composite and three grab) were collected by E&E. As shown in Table 1, lead, pesticides, PCBs and SVOCs were detected in several samples classified by E&E as surface soil samples. The following bullet list and discussion summarizes these samples and compounds that were detected above Commercial SCOs (Figure 6):

- Samples SS-PCW-01, SS-PCW-02 and SS-PCW-03 were three-point composite samples collected in rooms on the eastern side of the warehouse building. Sub-samples consisted of material within sumps, floor drains, under brick floors, from a pile of debris, and at a seam in the floor.
  - Samples SS-PCW-01 and SS-PCW-02 both contained polynuclear aromatic hydrocarbons (PAHs) including benzo(b)fluoranthene, benzo(a)pyrene, indeno(1,2,3-cd)pyrene and dibenz(a,h)anthracene, PCBs (Aroclor 1254), and lead above Commercial SCOs. SS-PWC-02 also detected benzo(a)anthracene above the Commercial SCO.

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- Sample SS-PWC-03 contained PCBs (Aroclor 1254) and lead above Commercial SCOs.
- Sample SS-PCW-04 was a grab sample from an area of visible soil in the Dust Bin area (exterior southeast corner of warehouse building) and was only analyzed for lead.
  - Lead was detected above Commercial SCOs in this sample.
- Samples SS-PCW-05 and SS-PWC-06 were three-point composite samples collected in rooms on the northwestern side of the warehouse building. Sub-samples consisted of material within sumps and floor drains and presumably from material under brick floors.
  - Two PAHs (benzo(b)fluoranthene and benzo(a)pyrene), and lead were detected above the Commercial SCOs in these composite samples. Sample SS-PWC-06 also contained PCBs (Aroclor 1254) above the Commercial SCO.
- Sample SS-PCW-07 was a two-point composite sample from soil beneath the concrete floor in the former Storage Plate Area. This sample was only analyzed for lead.
  - Lead was detected in this sample at levels above the Commercial SCOs.
- Sample SS-PCW-08 was a grab sample from an area of visible oil staining on the floor in the former Air Room that was only analyzed for pesticides/PCBs.
  - Pesticides/PCBs were not detected in this grab sample.
- Sample SS-PCW-09 was a three-point composite sample collected from within the former Central Factory Building area. Sub-samples consisted of soils from under an area of concrete floor, material within a drain, and material under the brick floor.
  - Five PAHs including benzo(a)anthracene, benzo(b)fluoranthene, benzo(a)pyrene, indeno(1,2,3-cd)pyrene and dibenz(a,h)anthracene, PCBs (Aroclor 1254), and lead were detected above Commercial SCOs in this sample.
- Sample SS-PWC-10 was a grab sample of material within the floor drain of the former Oil House room on the southern side of the warehouse building. This sample was only analyzed for SVOCs and pesticides/PCBs.
  - PCBs (Aroclor 1260), were detected above the Commercial SCO in this grab sample.
- Sample SS-PCW-11 was a two-point composite sample collected around the small building located in the northeast corner of the Site (suspected chemical

## SITE INVESTIGATION RESULTS

storage building). One sub-sample consisted of soil from the northeast corner of the building at the end of the concrete, and the other sub-sample was collected from soil under the concrete ramp on the north side of the building.

- One PAH (benzo(a)pyrene), PCBs (Aroclor 1260), and lead were detected above the Commercial SCOs in this composite sample.
- Sample SS-PWC-12 was a five-point composite sample collected around the eastern perimeter of the warehouse building.
  - Four PAHs including benzo(a)anthracene, benzo(b)fluoranthene, benzo(a)pyrene and dibenz(a,h)anthracene, and lead were detected above Commercial SCOs in this composite sample.
- Sample SS-PWC-13 was a three-point composite surface soil sample collected in and around the former electrical substation in the southeast corner of the Site. One sub-sample was reportedly collected at a seam in the concrete floor of the substation foundation and the two other sub-samples were collected adjacent to the transformer pad. This sample was analyzed for pesticides/PCBs. Pesticides/PCBs were not detected in this sample above Commercial SCOs.

**Lead.** Of the ten samples listed above that were analyzed for lead, all were found to contain lead at concentrations exceeding the Commercial SCO of 1,000 milligrams per kilogram (mg/kg). Lead concentrations in these samples ranged from 2,350 mg/kg to 178,000 mg/kg. The building interior surface samples and areas with the highest concentrations of lead are SS-PWC-06 (137,000 mg/kg) located in the former Lead Foundry Area and SS-PWC-07 (178,000 mg/kg) collected under the concrete floor in the former Storage Plate Area. These areas are located in the northwest portion of the warehouse building.

**PCBs.** As presented above, of the 11 samples analyzed for PCBs, seven were found to contain PCBs at concentrations that exceed the Commercial SCO of 1 mg/kg. PCB concentrations in these seven samples ranged from an estimated (J) 1.3 J mg/kg to 21 mg/kg. The samples and areas with the highest concentrations of PCBs are SS-PWC-01 (21 mg/kg) and SS-PWC-02 (7.9 mg/kg) located in the former E Building Addition and F Building/F Building Extension in the northeast portion of the warehouse building and SS-PWC-09 (17 mg/kg) collected in the former Central Factory Building area. None of these detections exceed the Toxic Substances Control Act regulatory level of 50 mg/Kg.

## SITE INVESTIGATION RESULTS

**PAHs.** Of the nine samples listed above that were analyzed for SVOCs, seven were found to contain various PAHs above the Commercial SCOs. The PAHs detected, and their range of concentrations above the Commercial SCOs include: benzo(a)anthracene (6.5 mg/kg to 29 mg/kg), benzo(b)fluoranthene (6.3 mg/kg to 35 J mg/kg), benzo(a)pyrene (2 J mg/kg to 31 J mg/kg), indeno(1,2,3-cd)pyrene (7.5 J mg/kg to 9.8 J mg/kg) and dibenz(a,h)anthracene (0.82 J mg/kg to 3.6 J mg/kg). As with PCBs, the highest concentrations of PAHs were observed in samples SS-PWC-01 and SS-PWC-02 collected in the northeast portions of the warehouse building and in sample SS-PWC-09 collected in the former Central Factory Building area.

It should be noted that several of the E&E samples that were comprised of (or partially comprised of) building debris have been removed from the warehouse building during the USEPA Removal Action in 2010. As shown on Figure 6, the E&E samples associated with debris that has been removed include SS-PCW-05, SS-PCW-06, SS-PCW-08, SS-PCW-09 and SS-PCW-10.

### ***3.1.2 Background Surface Soil Sampling Results***

Three background grab surface soil samples were collected by E&E from areas near the Site for lead analysis. Results of these background surface soil samples by sample number and location are as follows (Table 1):

- Sample SS-PCW-BK01 collected southeast of the corner of Profit Lane and 9<sup>th</sup> Street contained lead at a concentration of 201 mg/kg;
- Sample SS-PCW-BK02 collected north of the Site at the Tulip Corporation yard contained lead at a concentration of 1,400 mg/kg; and
- Sample SS-PCW-BK03 collected east of the Doris Jones Tennis Courts along Highland Avenue contained lead at a concentration of 281 mg/kg.

### ***3.1.3 Sediment/Sludge Sampling Results***

One composite sediment/sludge sample (SD-PCW-01) and a duplicate sample (SD-PCW-01/D) were collected by E&E of the material contained in the central floor drain of the Power City Warehouse building. These samples were analyzed for SVOCs, pesticides/PCBs and lead. Results from these samples (detections only) are provided in Table 1 and detections above Commercial SCOs are shown on Figure 6. Sediment/Sludge results above Commercial SCOs are as follows:



## SITE INVESTIGATION RESULTS

- Of the nine PAHs detected, only benzo(a)pyrene was detected above the Commercial SCO of 1 mg/kg at an estimated concentration of 2.1 J mg/kg (2.9 J mg/kg in the duplicate);
- PCBs (Aroclor 1254) were detected above the Commercial SCO of 1 mg/kg at an estimated concentration of 1.8 J mg/kg (1.2 J mg/kg – duplicate sample); and
- Lead was detected above the Commercial SCO of 1,000 mg/kg at a concentration of 225,000 mg/kg (270,000 mg/kg – duplicate sample).

During the USEPA Removal Action in 2010, the sediment/sludge in the central floor drain was removed and disposed of off-Site by the USEPA (Appendix A).

### ***3.1.4 Lead Paint Sampling Results***

One composite paint chip sample (sample PT-PCW-01) was collected by E&E from different colored wooden beams in the former Moulding Room for TCLP lead analysis. According to the E&E report, the TCLP result from this sample was found to exceed the lead TCLP regulatory action level (standard) of 5 milligrams per liter (mg/L) at a concentration of 42.3 mg/L.

### ***3.1.5 Asbestos Sampling Results***

Two samples of pipe insulation (AS-PCW-01 and AS-PCW-02) and one sample of roofing material (AS-PCW-03) were collected by E&E from the Power City Warehouse building for asbestos analysis. According to the E&E report, results indicated that both pipe insulations and the roofing material are considered asbestos containing materials (ACMs). The pipe insulations contained 30% to 68% chrysotile asbestos and the roofing material contained 49% chrysotile asbestos.

## **3.2 EA SITE CHARACTERIZATION RESULTS**

Results of the additional site characterization conducted by EA from September 2007 to October 2008 are contained in the “*Final Site Characterization Report, Power City Warehouse Site (9-32-131), Niagara Falls, Niagara County, New York*”



## SITE INVESTIGATION RESULTS

(EA, 2009) and are summarized below. The EA site characterization consisted of the following inspection and sampling activities:

- Warehouse flooring inspection;
- Debris sampling;
- Basement inspection and debris sampling; and
- Soil boring sampling.

Tables 2, 3, and 4 are analytical summary tables of detections from the EA investigation, with Commercial SCOs and TCLP standards listed for comparison to analytical results. Sample locations from the EA site characterization are shown on Figure 4 and Figures 7 and 8 provide a pictorial summary of analytical results detected above Commercial SCOs and TCLP standards for debris samples and subsurface soil samples collected from 0 to 2 ft-bgs, respectively.

### ***3.2.1 Warehouse Flooring Inspection Results***

By removing bricks and asphalt from several locations within the Power City Warehouse building, EA determined that a poured concrete sub-floor covers a large portion of the warehouse building. EA noted that the concrete floor was in good condition where inspected, with no major cracking or deterioration observed. Cores of the foundation by EA revealed that the concrete is 6 inches thick on average. Based upon this information, EA concluded that the concrete sub-floor would significantly limit COCs from migrating to the subsurface.

In addition, EA observed that brick floors are underlain by a layer of soil/sand on top of the concrete sub-floor. Concluding that the soil/sand was used as a bedding material for the brick floor, EA and the NYSDEC determined that sampling of the soils/sands located beneath the bricks would not be conducted as part of EA's additional characterization (EA, 2009).

### ***3.2.2 Debris Sampling Results***

In September 2007, EA collected 19 debris samples (composite and grab) throughout the interior of the former Power City Warehouse building (Figure 4). Grab debris samples DS-01, DS-04 through DS-15, DS-17, DS-18, and DS-21 were collected from

## SITE INVESTIGATION RESULTS

individual sumps/pits and composite debris samples DS-16, DS-19 and DS-20 were collected from continuous floor drains and trenches (EA, 2009). The debris samples were analyzed for SVOCs, TAL metals, and TCLP metals. Additionally, five debris samples (DS-09, DS-13 DS-14, DS-16 and DS-19) were also analyzed for VOCs based upon PID organic vapor field screening results.

As shown in Table 2 and on Figure 7, metals results from the debris samples indicated exceedances of the Commercial SCOs for arsenic, barium, cadmium, copper, lead, mercury, and zinc.

SVOCs that exceeded the Commercial SCOs in the debris samples consisted mainly of PAHs and include; acenaphthene, acenaphthylene, anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, dibenzofuran, fluoranthene, fluorene, indeno(1,2,3-cd)pyrene, naphthalene, phenanthrene, and pyrene. Other SVOCs detected above their respective SCOs include; 2-methylphenol, 4-methylphenol, hexachlorobenzene, and phenol.

No VOCs were detected above Commercial SCOs in the five debris samples analyzed.

TCLP metals results from the debris samples indicate that lead exceeded the TCLP standard of 5 mg/L in the 19 debris sampled collected by EA. TCLP lead concentrations in the debris samples ranged from 5.31 mg/L to 1,630 mg/L.

It should be noted that during the USEPA Removal Action in 2010 (discussed in Section 2.2) and as shown on Figure 7, materials associated with all EA debris samples, except DS-13, DS-20 and DS-21 were removed and disposed of off-Site by USEPA. Debris associated with samples DS-13, DS-20 and DS-21 remain at the Site, as this area was not addressed by the USEPA due to safety concerns regarding the building structure. These three debris samples contained four metals (arsenic, copper, lead and mercury) and 17 SVOCs (acenaphthene, acenaphthylene, anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, dibenzofuran, fluoranthene, fluorene, hexachlorobenzene, indeno(1,2,3-cd)pyrene, phenanthrene, and pyrene) above Commercial SCOs.

## **SITE INVESTIGATION RESULTS**

### ***3.2.3 Basement Inspection and Sampling Results***

The partial basement located in the northern portion of the Power City Warehouse building was observed by EA to be flooded during debris sampling activities. Following basement water removal and discharge, EA inspected the basement to assess its structural condition and determine if any types of wastes were present. The basement was found to be constructed of poured concrete and was observed by EA to be in good condition. One composite sample (BSMT COMPOSITE) was collected from debris observed in the basement and analyzed for TAL metals. Five metals including arsenic, barium, cadmium, copper and lead were detected above Commercial SCOs in this composite sample (Table 2).

During the USEPA Removal Action in 2010, the debris associated with the BSMT COMPOSITE sample was removed and disposed of off-Site by the USEPA (Appendix A).

### ***3.2.4 Soil Boring Sampling Results***

In September and October 2008, EA advanced 23 soil borings at the Site using direct-push drilling technologies. Thirteen of the soil borings were installed within the footprint of the former Power City Warehouse and 10 soil borings were installed around the exterior of the structure as shown on Figure 4. Thirty-one subsurface soil samples were collected from the 23 soil borings.

Analytical summary tables from these subsurface soil samples are presented in Tables 3 and 4, and Figure 8 provides a pictorial summary of analytical results detected above the Commercial SCOs.

#### ***3.2.4.1 Soil Borings within Building Footprint***

Soil borings SB-01 through SB-13 were installed beneath the concrete sub-floor within the footprint of the warehouse building. Because these samples were collected beneath the building slab, and because portions of the slab will be removed in the demolition, these samples are considered to be building exterior samples for the purpose of the Site characterization. Of the 13 soil samples collected from 0 to 2 ft-bgs for TAL metals analysis, only lead at two locations (SB-08 at 9,410 J mg/kg

## **SITE INVESTIGATION RESULTS**

and SB-12 at 1,160 J mg/kg) and chromium at one location (SB-11 at 2,060 J mg/kg) exceeded the Commercial SCOs.

Five of the boring locations (SB-01, SB-06, SB-09, SB-12 and SB-13) advanced within the building footprint were also sampled for VOCs and SVOCs, based upon field screening. These samples were collected at depth intervals ranging from 5 to 8 ft-bgs. No VOCs or SVOCs were detected in these samples exceeding the Commercial SCOs.

### ***3.2.4.2 Exterior Soil Borings***

Soil borings SB-14 through SB-23 were installed around the exterior of the warehouse building. All 10 exterior soil borings were sampled from 0 to 2 ft-bgs for TAL metals with the exception of boring SB-19. Of the nine exterior soil samples, only one location (SB-22) was found to contain COCs exceeding the Commercial SCOs. The 0 to 2 ft-bgs samples collected from boring SB-22 contained arsenic (40.4 mg/kg), copper (421 mg/kg), and lead (2,160 mg/kg) above Commercial SCOs.

Four of the boring locations (SB-17, SB-18, SB-19 and SB-23) advanced around the exterior of the warehouse building were also sampled for VOCs and SVOCs, based upon field screening, at depth intervals ranging from 3 to 7 ft-bgs. No VOCs or SVOCs exceeded the Commercial SCOs in these samples.

## **3.3 AMEC PRE-DESIGN STUDY RESULTS**

Observations and results from the July 2011 AMEC pre-design study are presented below. This study consisted of collecting surface soil samples from the building perimeter.

### ***3.3.1 Surface Soil Sampling Results***

In July 2011, 11 surface soil samples were collected by Amec from around the perimeter of the Power City Warehouse from a depth interval of 0 to 0.5 ft-bgs for the analysis of metals (antimony, lead and tin), TCLP lead, and pH. Analytical results from this study were compared to the Commercial SCOs and TCLP standards and are presented in Table 5. TestAmerica analytical data reports are

## SITE INVESTIGATION RESULTS

contained on CD in Appendix B and a Data Validation Summary Report prepared by Amec for these samples is located in Appendix C. Surface soil sample locations are presented on Figure 5 and Figure 9 provides a pictorial summary of COCs detected above Commercial SCOs and TCLP standards.

Lead was detected in all of the surface soil sampling locations at concentrations exceeding the Commercial SCO of 1,000 mg/kg. Lead surface soil concentrations ranged from 1,210 mg/kg to 16,900 mg/kg at the Site in the following areas (Table 5 and on Figure 9):

- On the eastern side of the Site (east of the warehouse building), surface soil concentrations ranged from 1,210 mg/kg to 7,940 mg/kg in borings B-10 through B-15. In this area, the highest concentrations of lead were observed in the northeast corner of the Site at surface soil borings B-10 and B-11 (7,940 mg/kg and 6,430 mg/kg respectively) and the lowest lead concentrations were observed in the southeast corner of the Site at borings B-14 and B-15 (1,210 mg/kg and 1,660 mg/kg respectively).
- On the south side of the Site (south of the warehouse building and north of the Tract II property) surface soil concentrations ranged from a low of 1,230 mg/kg at boring B-16 located to the east to a high of 16,900 mg/kg at boring B-18 located to the west and near the loading dock. Just south of the approximate midpoint to the warehouse building, surface soil boring B-17 detected lead at a concentration of 2,280 mg/kg.
- West of the warehouse building from the grassy area, surface soil borings B-19 and B-20 detected lead at concentrations of 1,730 mg/kg and 2,630 mg/kg respectively.

TCLP lead results ranged from 0.6 mg/L to 69.7 mg/L and exceeded the TCLP standard of 5 mg/L at four surface soil locations. Surface soil borings B-10 and B-11, located in the northeast corner of the Site, exceeded the lead TCLP standard at concentrations of 18.4 mg/L and 46.5 mg/L, respectively and borings B-17 and B-18, located along the southern boundary of the property exceeded the TCLP standard at concentrations of 21 mg/L and 69.7 mg/L, respectively.

Surface soil pH levels were found to be neutral to slightly alkaline and ranged from 7.16 to 8.25 standard units (S.U.).

## SITE INVESTIGATION RESULTS

During surface soil sampling, XRF field screening was conducted to measure real-time lead and tin concentrations for later correlation to laboratory results. Due to equipment failure of the XRF, only four surface soil sampling locations (B-10, B-11, B-19, and B-20) were field screened. Results of XRF field screening are presented in Table 5 below the analytical results. As shown on this table, lead XRF results for surface soils collected at B-10 and B-11 were an order of magnitude lower than analytical results. However, at B-19 and B-20, lead XRF results closely correlated with analytical data. XRF screening results for tin were an order of magnitude higher than analytical results.

## 4.0 SUMMARY OF SITE IMPACTS

This section provides a summary of impacts in Site media based upon the investigations conducted and the USEPA Removal Action performed.

### 4.1 SITE IMPACTS SUMMARY

#### *4.1.1 Remaining Building Material/Debris*

As discussed in Section 2.2, the USEPA Removal Action performed in 2010 removed a significant amount of impacted debris and other materials from a large portion of the Power City Warehouse building. As a result, materials associated with several samples obtained during the E&E and EA investigations have been removed from the Site. Figure 10 provides a pictorial summary of analytical detections above Commercial SCOs and TCLP standards for the debris samples that are located in the portion of the warehouse building that was not addressed by the USEPA Removal Action. As shown on this Figure, debris samples collected by E&E and EA in this portion of the building were found to exceed Commercial SCOs for the following:

- Metals including arsenic, copper, lead and mercury;
- SVOCs (mainly PAHs) including acenaphthene, acenaphthylene, anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, dibenzofuran, fluoranthene, fluorene, hexachlorobenzene, indeno(1,2,3-cd)pyrene, phenanthrene, and pyrene; and
- PCBs including Aroclor 1254.

Debris samples collected by EA were also analyzed for TCLP metals. As shown on Figure 10, the three debris samples collected in the portion of the warehouse building not addressed by the EPA were found to exceed the TCLP lead standard of 5 mg/L at concentrations ranging from 5.31 mg/L to 1,050 mg/L.

As previously addressed, it should be noted that several of the samples classified by E&E as surface soil samples were actually comprised of building debris, including materials within sumps and drains and presumably from the bedding material

## SUMMARY OF SITE IMPACTS

located beneath brick floors. As a result, only applicable E&E samples are included in the above debris sample summary and only the samples that consisted of surface soils are included below.

### 4.1.2 Building Exterior Surface Soil

Several surface soil samples (defined as being collected from 0 to 0.5 ft-bgs) have been collected at the Site. A summary of the these samples and analysis conducted is provided in the following table.

Company	# of Samples	Depth (bgs)	Analysis
E&E	5 Samples	0 to 6 inches	2 Samples for SVOCs, Pesticides/PCBs and Lead; 2 Samples for Lead only; and 1 Sample for Pesticides/PCBs only
AMEC	11 Samples	0 to 6 inches	Metals (Antimony, Lead, Tin) and TCLP Lead

A summary of the analytical results detected above Commercial SCOs and TCLP standards from these surface soil samples is provided on Figure 11. As shown on this figure, the following constituents were found to exceed Commercial SCOs:

- Lead,
- PAHs (from E&E samples) including benzo(a)anthracene, benzo(b)fluoranthene, benzo(a)pyrene and dibenz(a,h)anthracene, and
- PCBs (from E&E samples) including Aroclor 1260.

**Metals.** Surface soil samples collected by E&E and Amec from 0 to 0.5 ft-bgs and analyzed for lead were found to exceed the Commercial SCO of 1,000 mg/kg at concentrations ranging from 1,210 mg/kg to 178,900 mg/kg. As shown on Figure 11, these samples were collected around the exterior of the Power City Warehouse building, with the exception of E&E sample SS-PWC-07, which was collected in the former Storage Plate Area of the warehouse building beneath the broken up concrete floor. This sample (SS-PWC-07) was found to contain the highest lead level in soil at a concentration of 178,900 mg/kg.

The E&E and Amec surface soil samples (0 to 0.5 ft-bgs) collected around the exterior of the warehouse building ranged in concentrations from 1,210 mg/kg to 16,900 mg/kg in the following areas:



## SUMMARY OF SITE IMPACTS

- On the eastern side of the Site (east of the warehouse building) surface soil concentrations ranged from 1,210 mg/kg to 11,300 mg/kg. In this area, the highest concentrations of lead were observed at the southeast corner of the warehouse building at sample SS-PWC-04 (11,300 mg/kg) and in the northeast corner of the Site at sample SS-PWC-11 (8,240 mg/kg) and at Amec borings B-10 and B-11 (7,940 mg/kg and 6,430 mg/kg respectively).
- On the south side of the Site (south of the warehouse building and north of the Tract II property) surface soil concentrations ranged from a low of 1,230 mg/kg at boring B-16 located to the east to a high of 16,900 mg/kg at boring B-18 located to the west and near the loading dock.
- West of the warehouse building from the grassy area, surface soil borings B-19 and B-20 contained lead at concentrations of 1,730 mg/kg and 2,630 mg/kg respectively.

TCLP lead results from the 0 to 0.5 ft-bgs surface soil samples obtained by Amec ranged from 0.6 mg/L to 69.7 mg/L and exceeded the TCLP standard of 5 mg/L at four locations. Surface soil borings B-10 and B-11, located in the northeast corner of the Site, exceeded the lead TCLP standard at concentrations of 18.4 mg/L and 46.5 mg/L respectively. Also, borings B-17 and B-18, located along the southern boundary of the property, exceeded the lead TCLP standard at concentrations of 21 mg/L and 69.7 mg/L respectively.

**PAHs.** Of the five surface soil samples collected by E&E, only two samples (SS-PCW-11 and SS-PWC-12) were analyzed for SVOCs. Sample SS-PCW-11 was a two-point composite sample collected around the small building located in the northeast corner of the Site (Figure 6). This sample contained benzo(a)pyrene above the Commercial SCO of 1 mg/kg at an estimated concentration of 2 J mg/kg. Sample SS-PWC-12 was a five-point composite sample collected around the eastern perimeter of the warehouse building. The following four PAHs were detected above Commercial SCOs in this sample:

- benzo(a)anthracene was detected above the Commercial SCO of 5.6 mg/kg at a concentration of 6.5 mg/kg;
- benzo(b)fluoranthene was detected above the Commercial SCO of 5.6 mg/kg at a concentration of 6.3 mg/kg;

## SUMMARY OF SITE IMPACTS

- benzo(a)pyrene was detected above the Commercial SCO of 1 mg/kg at a concentration of 6.5 mg/kg; and
- dibenz(a,h)anthracene was detected above the Commercial SCO of 0.56 mg/kg at an estimated concentration of 0.82 J mg/kg.

**PCBs.** Of the five surface soil samples collected by E&E, three (SS-PCW-11, SS-PWC-12, and SS-PWC-13) were analyzed for Pesticides/PCBs with one sample (SS-PCW-11) containing PCBs above the Commercial SCO. Composite sample SS-PCW-11 collected in northeast corner of the Site contained PCBs (Aroclor 1260) above the Commercial SCO of 1 mg/kg at an estimated concentration of 3.8 J mg/kg (Figure 6). Composite sample SS-PWC-12 collected around the eastern perimeter of the warehouse building and composite sample SS-PWC-13 collected in and around the former electrical substation in the southeast corner of the Site did not contain detectable concentrations of PCBs.

### *4.1.3 Building Exterior Subsurface Soil*

As stated previously, the NYSDEC considers surface soil to be less than 0.5 ft-bgs. As such, the 22 EA boring samples collected from 0 to 2 ft-bgs were considered subsurface soil samples. Furthermore, because the borings within the building footprint were collected from beneath the building slab, they are being considered as building exterior samples for the purpose of this report and the remediation.

Of the 22 EA subsurface soil samples collected from 0 to 2 ft-bgs at the Site for TAL metals, only four samples were found to contain metals at concentrations above Commercial SCOs (Figure 8) as follows:

- **Within Building Footprint** – Of the 13 soil samples collected beneath the concrete sub-floor within the warehouse building, only three locations contained metals above Commercial SCOs. Soil samples collected at SB-08 and SB-12 contained lead above the Commercial SCO of 1,000 mg/kg at concentrations of 9,410 J mg/kg and 1,160 mg/kg, respectively. At boring SB-11, chromium was detected in soil above the Commercial SCO of 400 mg/kg for hexavalent chromium at an estimated concentration of 2,060 J mg/kg.
- **Building Perimeter** - Of the nine building perimeter soil samples collected by EA, only one location contained metals above Commercial SCOs. The sample collected from boring SB-22, advanced south of the warehouse building,

## SUMMARY OF SITE IMPACTS

contained the following three metals above Commercial SCOs: arsenic (40.4 mg/kg), copper (421 mg/kg), and lead (2,160 mg/kg).

Nine deep subsurface soil samples (defined as being collected below 2 ft-bgs) were collected from the Site. Deep subsurface soil sampling was conducted during the EA site characterization from soil boring depth intervals that exhibited elevated PID readings, staining, or odors. EA deep subsurface soil samples were analyzed for VOCs and SVOCs and were collected from depth intervals ranging from 3 to 8 ft-bgs.

Five of the deep subsurface soil samples (SB-01, SB-06, SB-09, SB-12 and SB-13) were collected within the building footprint and the other four (SB-17, SB-18, SB-19 and SB-23) were collected around the exterior of the warehouse building (Figure 4). No VOCs or SVOCs were detected in these samples exceeding the Commercial SCOs.

## 5.0 QUALITATIVE EXPOSURE ASSESSMENT

This section generally follows the guidelines presented in NYSDEC *DER-10 Technical Guidance for Site Investigation and Remediation* (NYSDEC, May 2010) to conduct a qualitative human health exposure assessment (HHEA). This assessment is being conducted to consider potential exposure to Site-related constituents of potential concern (COPCs) by human receptors and is limited to the data presented in this report.

It should be noted that ACMs and other building materials have been identified or likely still exist at the Site in the portion of the warehouse building not addressed in the Removal Action by the USEPA in 2010. These materials were not considered in this HHEA and will need to be addressed under separate actions associated with overall Site cleanup/redevelopment and potential building decontamination/demolition.

For the purposes of this assessment, constituents detected above Commercial SCOs in Site media are defined as COPCs. This is based upon the City's Master Plan to develop the Site for commercial use, even though the previous/current use of the Site is industrial. Investigations have identified COPCs in Site media at concentrations above Commercial SCOs (Figures 8, 10, and 11). Excluding samples associated with debris/materials removed from the Site during the USEPA Removal Action in 2010, the main COPCs identified at this Site include:

- **Metals, including:**
  - Arsenic;
  - Chromium;
  - Copper;
  - Lead; and
  - Mercury.
- **PAHs, including:**
  - Acenaphthene;
  - Acenaphthylene;
  - Anthracene;
  - Benzo(a)anthracene;

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- Benzo(a)pyrene;
  - Benzo(b)fluoranthene;
  - Benzo(g,h,i)perylene;
  - Benzo(k)fluoranthene;
  - Chrysene;
  - Dibenzo(a,h)anthracene;
  - Fluoranthene;
  - Fluorene;
  - Indeno(1,2,3-cd)pyrene;
  - Phenanthrene; and
  - Pyrene.
- **PCBs, including:**
  - Aroclor 1254; and
  - Aroclor 1260.

Human exposure to COPCs occurs via several possible routes, including ingestion, dermal contact, and inhalation. Exposure assessment is the process of describing, measuring, or estimating the intensity, frequency, and duration of potential human exposure to COPCs in environmental media (e.g., soil, air) at a site. This section discusses the mechanisms by which people (receptors) might come in contact with COPCs. The assessment includes the following:

- Description of the exposure setting;
- Identification of potential receptors;
- Identification of release mechanisms; and
- Identification of potential sources and exposure pathways.

A conceptual site model (CSM) was developed based on the history, conditions, analytical results, and the anticipated future commercial use scenario of the Site. The CSM identifies the relationship among sources, release mechanisms, exposure media, exposure routes, and potential receptors. Figure 12 depicts the CSM for the Site.

### 5.1 EXPOSURE SETTING

Potential exposure to COPCs at a site depends on a number of factors related to the physical characteristics of a site and its surroundings. These factors include location, surrounding land use, surface topography, hydrogeology, meteorology, and vegetation. They also include factors related to the current and anticipated future use(s) of the property. These factors determine the types of activities that might occur at the Site, the degree to which the Site is accessible to the general public, and the mechanisms that might result in migration of COPCs to on-Site and off-Site populations.

#### *5.1.1 Physical Setting and Land Use*

The Site is located in a multi-use area comprised of industrial, commercial, and residential properties. Properties immediately surrounding the Site include an industrial facility to the north, the former industrial Tract II property to the east and south, and Highland Avenue to the west. Beyond these properties to the north are mainly industrial facilities and to the east, south, and west are mainly residential properties with some commercial areas to the west. Additionally, schools are present west of the Site beyond Highland Avenue and east-southeast of the Site past the Tract II property.

The Site consists of approximately 5.9-acres of relatively level land; the majority of which, is covered by the former Power City Warehouse building. The building is currently in various levels of disrepair. The western portion of the Site consists of a grassy area and a gravel drive to the loading dock area. Along the southern boundary of the Site are some trees and undergrowth along with a segment of a retaining wall. The eastern portion of the Site has some grassy areas intermixed with broken asphalt and sections of concrete pavement. It is estimated that the Site consists of roughly 30 percent grass and concrete surface, 15 percent is wooded with undergrowth, and approximately 55 percent is building structures. Access to the Site is currently restricted by a chain link fence that surrounds the majority of the property.

The planned future use of the Site is commercial. Currently, the City's Master Plan is to redevelop the Site to include commercial facilities and an adult educational incubator, which would also be consistent with a commercial use scenario.

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In addition to land use, water use also contributes to the degree of potential exposure to COPCs at a site. Although no direct groundwater investigations have been performed on the Site, previous investigations conducted for the NYSDEC on the adjacent Tract II property indicate that there is no significant groundwater aquifer within the overburden soils or fill materials. Groundwater flow appears to be generally toward the southwest, toward the Niagara River, on top of the bedrock formation located between 12.5 and 23.5 ft-bgs (EA, 2009).

The NYSDEC concluded (in the Tract II Site Characterization Reports and the 2003 ROD) that groundwater in the vicinity of the Site was not likely to be used as a drinking water source due to: 1) the small amount of water available, 2) a local ordinance prohibiting water supply wells in the City, and 3) the fact that public drinking water is available throughout the area. Based upon this information and the assumed depth to groundwater at the Site, exposure pathways to potential COPCs in groundwater are currently not considered to be potentially complete.

### 5.2 CHARACTERIZATION OF POTENTIAL RECEPTORS

The identification of potential human receptors is based on the characteristics of the Site, the surrounding land uses, and the anticipated future land use.

#### 5.2.1 *Current On-Site Receptors*

The Site is currently vacant and access to the Site is restricted by a fence that surrounds the majority of the property. It is possible that an adult or adolescent trespasser could access the Site; thus this population is considered a potential receptor. However, since access to the Site is restricted by a maintained chain link fence, the frequency of exposure to the potential trespasser scenario is considered to be limited.

#### 5.2.2 *Future On-Site Receptors*

As indicated previously, the planned future use of the Site will include commercial facilities and an adult educational incubator, which would also be consistent with a

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commercial use scenario. The post-redevelopment occupants on the Site would be considered potential receptors.

Under the anticipated future commercial use scenario, the need to perform subsurface maintenance and/or construction activities at the Site is possible. Although this work would be completed following a Site Management Plan (SMP) to mitigate potential risks, the future construction worker and/or on-Site site worker involved with subsurface disturbance or excavation activities is considered a potential receptor.

### 5.3 IDENTIFICATION OF POTENTIAL EXPOSURE PATHWAYS

This section identifies the potential pathways by which the receptors described above could be exposed to COPCs potentially at the Site. An exposure pathway is the mechanism by which an individual may come into contact with COPCs in the environment. An exposure pathway is defined by four elements:

1. A source and mechanism of COPC release to the environment;
2. An environmental receiving or transport medium (e.g., air, soil) for the released COPC;
3. A point of potential contact with the medium of concern; and
4. An exposure route (e.g., ingestion) at the contact point.

An exposure pathway is considered "complete" only if all four elements are present. A discussion of the potential exposure pathways is presented below.

#### *5.3.1 Sources, Mechanisms of Releases, and Mechanisms of Transport*

COPCs at the Site are likely derived from historical operations. COPCs could have been released to soil through spills or operational practices during these operations.

**Metals.** Investigations have identified heavy metals (mainly lead) as a COPC in building debris and surface soil samples. In general, most inorganic constituents (metals) have a tendency to bind to soil and the primary transport mechanisms for these constituents tend to be dispersion of particulates in air upon disturbance of soil, and migration through erosion/runoff during storm events.



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**PAHs.** PAHs have also been identified as COPCs in building debris samples and in surface soils at the Site. PAHs are considered to be one of the more widespread organic pollutants and are known to be present in organized areas through various anthropogenic activities.

The PAHs identified as COPCs at the Site consist of the heavier molecular weight PAHs that contain four or more rings in their structure and PAHs that have three rings. PAHs with four or more rings are considered to have very low water solubility, are strongly sorbed to soils, and do not tend to move in soil from their point of release. Three-ring PAHs are slightly more mobile, but still resist movement in soil (WVDEP 1999). Both the four-ring and three-ring PAHs would be expected to have the greatest potential to migrate by mechanical means in the soil medium through dispersion of particulates in air upon disturbance of the soil, and by erosion/runoff during storm events.

**PCBs.** PCBs (Aroclor 1254 and Aroclor 1260) have also been identified as COPCs in building debris samples and in soils at the Site. According to the USEPA, PCBs have historically been used in numerous applications including; heat transfer, hydraulic and electrical equipment; as plasticizers in rubber products, paints and plastics; in dyes, pigments, and carbonless copy paper; as stabilizing additives in flexible PVC coatings of electrical wiring and electronic components; and in several additional industrial applications (“Polychlorinated Biphenyls [PCBs] - Basic Information”).

The heavier PCBs (i.e., Aroclor 1254 and 1260) are very stable compounds and do not decompose readily. These PCBs exhibit fairly low mobility in soils due to their tendency to be strongly sorbed to soils and relatively low solubility in aqueous solutions (Haasbeek, 1994). The primary transport mechanism for these constituents tends to be dispersion of particulates in air upon disturbance of soil, and migration through erosion/runoff during storm events.

**Fugitive Dust Generation** - Non-volatile chemicals present in soil can be released to ambient air as a result of fugitive dust generation. The Site is currently covered by roughly 30 percent grass and concrete, 15 percent by wooded areas with undergrowth, and approximately 55 percent by building structures. The presence of these surface features would mitigate significant airborne suspension of surface soil

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particles resulting from either vehicles or pedestrian traffic and thus fugitive dust generation is not considered to be a significant source of exposure.

**Vapor Phase Transport** - Volatile chemicals are not present in Site soils at levels of concern and are not believed to be present in groundwater beneath the Site. COPCs including PAHs and PCBs detected in Site soils have low volatility are not considered to represent a significant source of vapors to be released into ambient air. Therefore, this migration pathway is not considered to represent a significant exposure pathway.

**Erosion/Surface Water Runoff** - COPCs present in shallow Site soils can be eroded and be transported off-site as a result of surface water runoff. The presence of grass, concrete and wooded areas with undergrowth at the Site should minimize the erosion of the ground surface and should mitigate migration of COPCs from erosion following significant rain events via storm water runoff or snow melt.

**Leaching (percolation)** - COPCs present in shallow soil at the Site could migrate downward to groundwater with infiltrating precipitation. Since some “open areas” are present at the Site, infiltration of rain water and snow melt is possible. However, COPCs at the Site tend to bind to soil, so the transport mechanism is not considered a significant pathway for potential COPC transport at the Site.

**Groundwater Transport** - Constituents in groundwater could migrate in the direction of groundwater flow and be affected by the chemical properties of the water-bearing matrix (i.e., dissolved oxygen, reduction potential, and organic content). Because leaching is not a likely transport mechanism to groundwater on the Site, it follows that transport of COPCs in groundwater is not likely to occur.

### ***5.3.2 Exposure Media and Routes***

Based upon the known or potential presence of COPCs in Site media and the potential migration pathways discussed above, Site receptors could potentially contact COPCs in the following environmental media:

- Surface Soil
- Soils down to 10 ft-bgs (practical subsurface depth interval for utility/construction excavations)

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- Ambient air within an excavation

Potential exposure routes associated with these media would include: incidental ingestion, dermal contact, and inhalation of soil particulates.

### ***5.3.3 Exposure Scenarios***

Given the characteristics of the identified COPCs, and the relevant release processes, the potential exposure pathways for the current and anticipated future land use of the Site (exposure scenarios) are described below.

As discussed above, the Site is vacant and access is limited by a chain link fence that surrounds the majority of the property. Current potential receptors include only a Site trespasser.

#### ***5.3.3.1 Current Trespasser***

Current trespassers may potentially be exposed to COPCs in building debris and surface soil via incidental ingestion, dermal contact, and inhalation of particles if they partake in activities that disturb the building debris or ground surface. Concentrations of COPCs were detected in surface soil samples above Commercial SCOs and in debris samples from the portion of the warehouse building not addressed by the USEPA Removal Action. Therefore, a trespasser could be exposed via dermal contact, ingestion, or inhalation of particulates (Figure 12). However, since access to the Site is restricted by a maintained chain link fence, any exposure to surface soil or remaining building debris by a current trespasser is considered to be minimal.

#### ***5.3.3.2 Future On-Site Workers***

In the absence of remedial action, future on-site workers may potentially be exposed to COPCs in surface soil. Potential exposure routes include incidental ingestion, dermal contact, and inhalation of particulates (Figure 12).

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### *5.3.3.3 Future On-Site Construction Worker*

Future on-Site construction workers involved with subsurface disturbance or excavation for repair activities of on-Site utilities may potentially be exposed to COPCs in surface and subsurface soil. Potential exposure routes include incidental ingestion, dermal contact, and inhalation of soil particulates associated with the subsurface disturbance or excavation (Figure 12). Subsurface disturbance or excavation work would require proper methods to minimize worker exposure (i.e., such as those defined in a SMP).

## 5.4 POTENTIAL ECOLOGICAL IMPACTS

Based upon the investigations conducted at the Site, it does not appear that a Fish and Wildlife Impact Analysis (FWIA) is necessary. The Site is located in an urban area consisting of industrial, commercial, and residential areas with minimal ecological habitat. COPCs have been identified in surface soil; however the potential for Site related COPCs to migrate to potential fish and wildlife resources is considered minimal. No surface water bodies are located in the immediate vicinity of the Site and although no direct groundwater investigations have been performed, groundwater at the Site is not anticipated to be impacted at estimated depths of 12.5 to 23.5 ft-bgs.

## 6.0 CONCLUSIONS AND RECOMMENDATIONS

### 6.1 CONCLUSIONS

Based upon the three investigations conducted at the Site, the following conclusions were made:

#### 6.1.1 *Building Debris*

1. Debris located throughout the Power City Warehouse building has been found to exceed Commercial SCOs for several metals, several SVOCs (mainly PAHs), and PCBs (Aroclor 1254 and Aroclor 1260).
2. The USEPA Removal Action performed in 2010 removed a significant amount of debris and other hazardous material from the Power City Warehouse building, but did not address the eastern portion of the building, due to safety concerns.
3. Debris samples obtained from the portion of the warehouse building not addressed by the USEPA in 2010 contain metals (arsenic, copper, lead and mercury), SVOCs (mainly PAHs), and PCBs (Aroclor 1254) at concentrations above Commercial SCOs. Additionally, all TCLP metals samples collected in this portion of the building were found to exceed the TCLP standard for lead.
4. Other hazardous materials including ACMs, lead based paint, PCB light ballasts, batteries, and mercury switches likely exist in the portions of the Site buildings not addressed by the USEPA in 2010.

#### 6.1.2 *Surface Soil*

1. All 15 surface soil samples collected across the Site from 0 to 0.5 ft-bgs and analyzed for lead were found to exceed the Commercial SCO of 1,000 mg/kg.
2. Two of the 16 surface soil samples collected at the Site were analyzed for SVOCs. Both samples were exterior composite samples collected from 0 to 0.5 ft-bgs on the northeastern portion of the Site. The composite sample collected around the small building located in the northeast corner of the Site contained benzo(a)pyrene above the Commercial SCO and the composite sample collected around the eastern perimeter of the warehouse building contained benzo(a)anthracene, benzo(b)fluoranthene, benzo(a)pyrene and dibenz(a,h)anthracene above Commercial SCOs.

## CONCLUSIONS AND RECOMMENDATIONS

3. Three of the 16 surface soil samples collected at the Site were analyzed for pesticides/PCBs. These samples were exterior composite samples collected from 0 to 0.5 ft-bgs on the eastern side of the Site. The composite sample collected around the small building located in the northeast corner of the Site contained one PCB detection (Aroclor 1260) above the Commercial SCO. The composite sample collected around the eastern perimeter of the warehouse building and the composite sample collected in and around the former electrical substation in the southeast corner of the Site did not detect any PCBs.

### ***6.1.3 Subsurface Soil***

1. Twenty-two shallow (0 to 2 ft-bgs) and 9 deep (3 to 8 ft-bgs) subsurface soil samples have been collected at the Site. The shallow subsurface samples were analyzed for metals and the deep subsurface samples were analyzed for VOCs and SVOCs. 18 of the subsurface soil samples were collected within the warehouse building footprint and the other 13 were collected around the exterior of the building. Four of the 22 shallow subsurface samples contained metals (arsenic, chromium, copper or lead) exceeding the SCOs. No VOCs or SVOCs exceeded Commercial SCOs from the deep subsurface samples.
2. Three samples collected from soil beneath the slab of the Power City Warehouse Building exhibited levels of metals exceeding the Commercial SCOs. One of these samples was collected from soil in an area where the concrete had been breached. The remaining two were from soil borings SB-08 and SB-12, which were located in the north-central portion of the building.
3. Subsurface soil sampling results indicate that SVOCs at concentrations above Commercial SCOs (mainly PAHs) are limited to building debris and surface soils at the Site.

### ***6.1.4 Qualitative Exposure Assessment***

The qualitative HHEA, which was limited to the findings presented in this report, identified the potential for human exposure to COPCs in Site media (building debris and surface soils) through dermal contact, incidental ingestion, and inhalation of particulates. The potentially exposed current on-Site receptors include only persons that may trespass onto the Site; however since access to the Site is restricted by a maintained fence, this exposure expected to be minimal. Based upon the anticipated future commercial development and land use scenario, the potentially exposed future on-Site receptors include construction workers and/or Site workers.

## CONCLUSIONS AND RECOMMENDATIONS

Based upon the investigations conducted, it does not appear that a FWIA is necessary. The Site is located in an urban area with minimal ecological habitat. The potential for Site related COPCs to migrate to potential fish and wildlife resources is considered minimal and no surface water bodies are located in the immediate vicinity of the Site.

### 6.2 POTENTIAL DATA GAPS

Based upon the results presented in Section 4.0, the following bullet list provides potential data gaps that should be considered to complete the characterization of the Site and provide additional data to support anticipated remedial measures:

- Groundwater was not characterized on the Site. A groundwater investigation should be considered to determine groundwater quality and verify groundwater flow direction. Groundwater samples should be collected and analyzed for VOCs, SVOCs, metals, and PCBs.
- Additional surface soil sampling for PAHs and PCBs should be considered to define the horizontal extent of these constituents in Site soils. Only limited composite sampling in surface soil for these compounds has been conducted on the eastern side of the Site during the E&E investigation, which identified PAHs and PCBs above Commercial SCOs.
- Since it is anticipated that portions of the Power City Warehouse building will be demolished or renovated, an investigation should be considered to characterize the bedding material located under the brick floors throughout the warehouse building.
- The extent of the lead beneath the building slab in the vicinity of soil borings SB-08 and SB-12 has not been completely defined.
- Finally, further identification/characterization should also be considered of the remaining debris, sediments and sludge, and any other potentially hazardous materials (ACMs, lead based paint, PCB light ballasts, batteries, mercury switches, etc.) located in the portion of the Power City Warehouse building not addressed by the USEPA Removal Action in 2010. Due to the poor condition of this portion of the building, this may only be accomplished safely during anticipated future building demolition activities.

## CONCLUSIONS AND RECOMMENDATIONS

### 6.3 RECOMMENDATIONS

Based upon the findings presented in this report, it is recommended that an additional investigation be completed to further characterize the Site and provide additional data to support anticipated remedial measures. Additional investigation should consider the potential data gaps identified in Section 6.2 of this report.

These briefly include:

- A groundwater investigation to determine groundwater quality and verify groundwater flow direction;
- Additional surface soil sampling for PAHs and PCBs to define the horizontal extent of these constituents in Site soils above SCOs;
- An investigation to characterize the bedding material located under brick floors located in portions of the Power City Warehouse building in conjunction with demolition activities;
- If the floor slab is removed in the vicinity of soil borings SB-08 and SB-12, confirmatory samples should be collected to verify the extent of lead in subsurface soil at these locations; and
- Identification and characterization of the remaining debris, sediments and sludge, and any other potentially hazardous materials (ACMs, lead based paint, PCP light ballasts, batteries, mercury switches, etc.) located in the portion of the Power City Warehouse building not addressed by the USEPA in conjunction with demolition activities.



## 7.0 REFERENCES

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## TABLES

**Table 1**  
E and E Site Investigation  
Summary of Analytical Results Detected  
Tract I Site - Niagara Falls, New York

Sample Number			SS-PCW-01		SS-PCW-02		SS-PCW-03		SS-PCW-04		SS-PCW-05		SS-PCW-06		SS-PCW-07		SS-PCW-08		SS-PCW-09	
Sample Date			May 1999		May 1999		May 1999		May 1999		May 1999		May 1999		May 1999		May 1999		May 1999	
Sample Type			C, Debris		C, Debris		C, Debris/SS		G, SS		C, Debris		C, Debris		C, SS		G, Debris		C, Debris/SS	
Sample Depth*			0-6 inches		0-6 inches		0-6 inches		0-6 inches		0-6 inches		0-6 inches		0-6 inches		0-6 inches		0-6 inches	
Parameter	Units	Restricted Use Soil Cleanup Objectives - Commercial Standard <sup>1</sup>	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier
<b>TCL SVOCs</b>																				
Naphthalene	mg/kg	500	1.1 J		ND		ND		NA		ND		ND		NA		NA		2.8 J	
2-methylnaphthalene	mg/kg		0.51 J		ND		ND		NA		ND		ND		NA		NA		1.2 J	
Acenaphthylene	mg/kg	500	0.58 J		ND		ND		NA		ND		ND		NA		NA		0.64 J	
Acenaphthene	mg/kg	500	3.9 J		4.6 J		ND		NA		ND		ND		NA		NA		6.6	
Dibenzofuran	mg/kg	350	2.4 J		2.7 J		ND		NA		ND		ND		NA		NA		4.4 J	
Di-ethylphthalate	mg/kg		ND		ND		ND		NA		ND		ND		NA		NA		ND	
Fluorene	mg/kg	500	3.5 J		3.1 J		ND		NA		ND		ND		NA		NA		5.7	
Phenanthrene	mg/kg	500	33 D		91		ND		NA		5.5 J		6.5 J		NA		NA		68 D	
Anthracene	mg/kg	500	12		7.4 J		ND		NA		ND		ND		NA		NA		19	
Carbazole	mg/kg		4.6		7.6 J		ND		NA		ND		ND		NA		NA		9	
Di-n-butylphthalate	mg/kg		ND		ND		ND		NA		ND		ND		NA		NA		0.79 J	
Fluoranthene	mg/kg	500	53 D		87 D		ND		NA		10 J		13 J		NA		NA		63 D	
Pyrene	mg/kg	500	50 D		100 D		ND		NA		9.1 J		11 J		NA		NA		130 DJ	
Butylbenzylphthalate	mg/kg		ND		1.7 J		13 J		NA		ND		ND		NA		NA		ND	
Benzo(a)anthracene	mg/kg	5.6	2.8		22		ND		NA		3.9 J		4.3 J		NA		NA		29	
Chrysene	mg/kg	56	22 D		35		ND		NA		6.4 J		7.7 J		NA		NA		36	
bis(2-ethylhexyl)phthalate	mg/kg		5.3		1.4 J		1.8 J		NA		3.1 J		ND		NA		NA		2 J	
Di-n-octylphthalate	mg/kg		ND J		2 J		ND		NA		ND		ND		NA		NA		ND	
Benzo(b)fluoranthene	mg/kg	5.6	23 D		33 D		ND		NA		7.5 J		8.1 J		NA		NA		35 J	
Benzo(k)fluoranthene	mg/kg	56	24 D		38 D		ND		NA		6.4 J		7.8 J		NA		NA		39 J	
Benzo(a)pyrene	mg/kg	1	30 J		28 D		ND		NA		4.9 J		4.8 J		NA		NA		31 J	
Indeno(1,2,3-cd)pyrene	mg/kg	5.6	9.8 J		7.7 J		ND		NA		1.5 J		1.9 J		NA		NA		7.5 J	
Dibenz(a,h)anthracene	mg/kg	0.56	3.6 J		2.5 J		ND		NA		ND		ND		NA		NA		2.7 J	
Benzo(g,h,i)perylene	mg/kg	500	8.9 J		6.3 J		ND		NA		1.6 J		ND		NA		NA		7.3 J	
<b>TCL Pesticides/PCBs</b>																				
beta-BHC	mg/Kg	3	NA		NA		NA		NA		NA		0.073 J		NA		ND		0.087	
delta-BHC	mg/Kg	500	NA		NA		NA		NA		NA		0.28		NA		ND		0.24	
gamma-BHC	mg/Kg	9.2	NA		NA		NA		NA		NA		0.079 J		NA		ND		0.054 J	
Heptachlor	mg/Kg	15	NA		NA		NA		NA		NA		ND		NA		ND		0.055 J	
Aldrin	mg/Kg	0.68	0.12		0.092		ND		NA		ND		ND		NA		ND		0.21	
Heptachlor Epoxide	mg/Kg		0.39		0.31		ND		NA		0.13		0.2		NA		ND		0.7	
Dieldrin	mg/Kg	1.4	0.26		0.11 J		ND		NA		ND		ND		NA		ND		0.24	
Endrin	mg/Kg	89	0.29		ND		ND		NA		ND		ND		NA		ND		0.33	
Endosulfan II	mg/Kg	200	NA		NA		NA		NA		NA		ND		NA		ND		0.15	
Endosulfan Sulfate	mg/Kg	200	0.12		ND		ND		NA		ND		ND		NA		ND		0.21	
4,4'-DDT	mg/Kg	47	0.26		0.12 J		ND		NA		ND		0.15 J		NA		ND		0.4	
Methoxychlor	mg/Kg		0.95		ND		1.8		NA		0.3 J		0.65 J		NA		ND		1.5	
Endrin Ketone	mg/Kg		0.14		0.15		ND		NA		ND		0.12 J		NA		ND		0.34	
Endrin aldehyde	mg/Kg		NA		NA		NA		NA		NA		NA		NA		NA		NA	
gamma-Chlordane	mg/Kg		0.15		ND		ND		NA		ND		ND		NA		NA		NA	
Aroclor-1254	mg/Kg	1	21		7.9		1.3 J		NA		0.93 J		2.1 J		NA		ND		17	
Aroclor-1260	mg/Kg	1	NA		NA		NA		NA		NA		NA		NA		NA		NA	
<b>Total Lead</b>																				
Lead	mg/Kg	1,000	2,350		3,540		3,650		11,300		19,200		137,000		178,000		NA		31,800	
<b>pH - standard units (S.U.)</b>																				
pH	S.U.		4.9		6.3		7.2		NA		7.8		7.3		NA		6.8		6.9	

**Notes:**

ND - Analyte not detected by laboratory  
D - Sample was diluted by laboratory during analysis  
J - Estimated value below laboratory reporting limit  
C = Composite Sample  
G = Grab Sample  
SS = Surface Soil

Data presented in this table was obtained from the Ecology and Environment Engineering, P.C. (E&E) "Site Investigation Report for the Power City Warehouse, Niagara Falls, New York" dated May 31, 2000  
NA - Analyte not analyzed or not reported in the E&E report referenced above.

\* = Depths are as reported in the E&E report text referenced above.

Debris = Sample collected all or partially from material within sumps or drains or bedding material under brick floors

TCL = Target compound list

<sup>1</sup> = 6 New York Code of Rules and Regulations (NYCRR) Part 375

**Table 1**  
E and E Site Investigation  
Summary of Analytical Results Detected  
Tract I Site - Niagara Falls, New York

Sample Number			SS-PCW-10		SS-PCW-11		SS-PCW-12		SS-PCW-13		SS-PCW-BK01		SS-PCW-BK02		SS-PCW-BK03		SD-PCW-01		SD-PCW-01/D	
Sample Date			May 1999		May 1999		May 1999		May 1999		May 1999		May 1999		May 1999		May 1999		May 1999	
Sample Type			G, Debris		C, SS		C, SS		C, SS		G, background SS		G, background SS		G, background SS		C, Sediment/Sludge		C, Sediment/Sludge	
Sample Depth*			0-6 inches		0-6 inches		0-6 inches		0-6 inches		0-6 inches		0-6 inches		0-6 inches		0-6 inches		0-6 inches	
Parameter	Units	Restricted Use Soil Cleanup Objectives - Commercial Standard <sup>1</sup>	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier
<b>TCL SVOCs</b>																				
Naphthalene	mg/kg	500	ND		0.48		0.33 J		NA		NA		NA		NA		NA		NA	
2-methylnaphthalene	mg/kg		ND		0.3 J		0.23 J		NA		NA		NA		NA		NA		NA	
Acenaphthylene	mg/kg	500	ND		0.075 J		0.17 J		NA		NA		NA		NA		NA		NA	
Acenaphthene	mg/kg	500	ND		0.36 J		1.8		NA		NA		NA		NA		NA		NA	
Dibenzofuran	mg/kg	350	ND		0.31 J		0.83		NA		NA		NA		NA		NA		NA	
Di-ethylphthalate	mg/kg		ND		0.055 J		ND		NA		NA		NA		NA		NA		NA	
Fluorene	mg/kg	500	ND		0.36 J		1.3		NA		NA		NA		NA		NA		NA	
Phenanthrene	mg/kg	500	ND		4.2 D		17 D		NA		NA		NA		NA		1.8 J		5.5 J	
Anthracene	mg/kg	500	ND		0.71		4.1 DJ		NA		NA		NA		NA		NA		NA	
Carbazole	mg/kg		ND		0.45		1.3		NA		NA		NA		NA		NA		NA	
Di-n-butylphthalate	mg/kg		ND		0.1 J		ND		NA		NA		NA		NA		NA		NA	
Fluoranthene	mg/kg	500	ND		4.8 D		21 D		NA		NA		NA		NA		2.7 J		6.1 J	
Pyrene	mg/kg	500	ND		6.9 D		20 D		NA		NA		NA		NA		2.4 J		5 J	
Butylbenzylphthalate	mg/kg		ND		0.15 J		0.22 J		NA		NA		NA		NA		NA		NA	
Benzo(a)anthracene	mg/kg	5.6	ND		1.8 D		6.5 D		NA		NA		NA		NA		ND		2.4 J	
Chrysene	mg/kg	56	ND		2.3 D		7.1 D		NA		NA		NA		NA		1.8 J		3.4 J	
bis(2-ethylhexyl)phthalate	mg/kg		3.3 J		0.57 J		0.16 J		NA		NA		NA		NA		NA		NA	
Di-n-octylphthalate	mg/kg		ND		ND J		ND		NA		NA		NA		NA		NA		NA	
Benzo(b)fluoranthene	mg/kg	5.6	ND		2.5 J		6.3 D		NA		NA		NA		NA		2.4 J		3.1 J	
Benzo(k)fluoranthene	mg/kg	56	ND		2.4 J		6.5 D		NA		NA		NA		NA		2.1 J		3.9 J	
Benzo(a)pyrene	mg/kg	1	ND		2 J		6.5 D		NA		NA		NA		NA		2.1 J		2.9 J	
Indeno(1,2,3-cd)pyrene	mg/kg	5.6	ND		0.8 J		2.2 J		NA		NA		NA		NA		NA		NA	
Dibenz(a,h)anthracene	mg/kg	0.56	ND		0.3 J		0.82 J		NA		NA		NA		NA		NA		NA	
Benzo(g,h,i)perylene	mg/kg	500	ND		0.93 J		2.1 J		NA		NA		NA		NA		ND		1.6 J	
<b>TCL Pesticides/PCBs</b>																				
beta-BHC	mg/Kg	3	ND		0.07		ND		ND		NA		NA		NA		NA		NA	
delta-BHC	mg/Kg	500	NA		NA		NA		NA		NA		NA		NA		NA		NA	
gamma-BHC	mg/Kg	9.2	ND J		0.055		ND		ND		NA		NA		NA		NA		ND	
Heptachlor	mg/Kg	15	ND		0.065		ND		ND		NA		NA		NA		NA		ND	
Aldrin	mg/Kg	0.68	NA		NA		NA		NA		NA		NA		NA		NA		ND	
Heptachlor Epoxide	mg/Kg		ND		ND		0.074		0.18		NA		NA		NA		NA		ND	
Dieldrin	mg/Kg	1.4	ND J		0.11		ND		ND		NA		NA		NA		NA		ND	
Endrin	mg/Kg	89	NA		NA		NA		NA		NA		NA		NA		NA		ND	
Endosulfan II	mg/Kg	200	NA		NA		NA		NA		NA		NA		NA		NA		ND	
Endosulfan Sulfate	mg/Kg	200	NA		NA		NA		NA		NA		NA		NA		NA		ND	
4,4'-DDT	mg/Kg	47	ND		0.2		ND		ND		NA		NA		NA		NA		ND	
Methoxychlor	mg/Kg		0.38 J		37		0.14		0.81		NA		NA		NA		NA		ND	
Endrin Ketone	mg/Kg		0.2 J		ND		ND		ND		NA		NA		NA		NA		ND	
Endrin aldehyde	mg/Kg		ND		0.22		ND		ND		NA		NA		NA		NA		ND	
gamma-Chlordane	mg/Kg		ND		0.069		ND		ND		NA		NA		NA		NA		ND	
Aroclor-1254	mg/Kg	1	NA		NA		NA		NA		NA		NA		NA		1.8 J		1.2 J	
Aroclor-1260	mg/Kg	1	3.7		3.8 J		ND		ND		NA		NA		NA		NA		NA	
<b>Total Lead</b>																				
Lead	mg/Kg	1,000	NA		8,240		2,790		NA		201		1,400		281		225,000		270,000	
<b>pH - standard units (S.U.)</b>																				
pH	S.U.		8		9.6		8.5		8.8		NA		NA		NA		8.3		8.3	

**Notes:**

ND - Analyte not detected by laboratory  
D - Sample was diluted by laboratory during analysis  
J - Estimated value below laboratory reporting limit  
C = Composite Sample  
G = Grab Sample  
SS = Surface Soil

Data presented in this table was obtained from the Ecology and Environment Engineering, P.C. (E&E) "Site Investigation Report for the Power City Warehouse, Niagara Falls, New York" dated May 31, 2000  
NA - Analyte not analyzed or not reported in the E&E report referenced above.  
\* = Depths are as reported in the E&E report text referenced above.  
Debris = Sample collected all or partially from material within sumps or drains or bedding material under brick floors  
TCL = Target compound list  
<sup>1</sup> = 6 New York Code of Rules and Regulations (NYCRR) Part 375

**Table 2**  
EA Debris Samples  
Summary of Analytical Results Detected  
Tract I Site - Niagara Falls, New York

Sample Location			D5-01		D5-04		D5-05		D5-06		D5-07	
Sample Number			9-32-131-D5-01		9-32-131-D5-04		9-32-131-D5-05		9-32-131-D5-06		9-32-131-D5-07	
Sample Date			9/12/2007		9/12/2007		9/12/2007		9/12/2007		9/12/2007	
Sample Type			Debris		Debris		Debris		Debris		Debris	
Parameter	Units	Restricted Use Soil Cleanup Objectives - Commercial Standard <sup>1</sup>	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier
<b>VOCs</b>												
Acetone	mg/kg	500 b	NA		NA		NA		NA		NA	
Carbon disulfide	mg/kg		NA		NA		NA		NA		NA	
1,3-Dichlorobenzene	mg/kg	280	NA		NA		NA		NA		NA	
2-Hexanone	mg/kg		NA		NA		NA		NA		NA	
4-Isopropyltoluene	mg/kg		NA		NA		NA		NA		NA	
Naphthalene	mg/kg	500 b	NA		NA		NA		NA		NA	
Toluene	mg/kg	500 b	NA		NA		NA		NA		NA	
1,2,4-Trichlorobenzene	mg/kg		NA		NA		NA		NA		NA	
1,2,4-Trimethylbenzene	mg/kg	190	NA		NA		NA		NA		NA	
<b>SVOCs</b>												
Acenaphthene	mg/kg	500 b	3,800 JD		78,000		7,600 JD		280 J		8,900	
Acenaphthylene	mg/kg	500 b	1,000 JD		20,000		1,300 JD		350 J		1,600	
Anthracene	mg/kg	500 b	8,900 D		150,000 D		19,000 D		920 J		18,000 D	
Benzo(a)anthracene	mg/kg	5.6	31,000 D		340,000 D		38,000 D		1,900		32,000 D	
Benzo(a)pyrene	mg/kg	1 f	27,000 D		270,000 D		30,000 D		1,600		24,000 D	
Benzo(b)fluoranthene	mg/kg	5.6	39,000 D		310,000 D		41,000 D		2,000		34,000 D	
Benzo(g,h,i)perylene	mg/kg	500 b	17,000 D		140,000 D		17,000 D		1,500		14,000 D	
Benzo(k)fluoranthene	mg/kg	56	14,000 D		73,000		15,000 D		1,400		12,000	
Bis(2-ethylhexyl)phthalate	mg/kg		U		U		U		640 J		830 J	
Carbazole	mg/kg		7,500 D		87,000 JD		10,000 D		480 J		11,000	
Chrysene	mg/kg	56	34,000 D		300,000 D		35,000 D		2,100		30,000 D	
Dibenzo(a,h)anthracene	mg/kg	0.56	5,100 JD		55,000		5,300 JD		320 J		4,300 JD	
Dibenzofuran	mg/kg	350	3,300 JD		73,000 JD		6,200 JD		270 J		8,300	
2,4-Dichlorophenol	mg/kg		U		U		U		U		U	
2,4-Dimethylphenol	mg/kg		U		4,700 J		U		U		340 J	
Di-n-butylphthalate	mg/kg		U		U		U		330 J		540 J	
Di-n-octylphthalate	mg/kg		U		U		U		U		U	
Fluoranthene	mg/kg	500 b	82,000 D		790,000 D		94,000 D		5,800		82,000 D	
Fluorene	mg/kg	500 b	3,400 JD		77,000		7,300 JD		280 J		9,100	
Hexachlorobenzene	mg/kg	6	U		U		U		U		U	
Indeno(1,2,3-cd)pyrene	mg/kg	5.6	15,000 D		140,000 D		16,000 D		1,100 J		13,000 D	
2-Methylnaphthalene	mg/kg		1,700 JD		58,000		4,100 JD		300 J		4,900	
2-Methylphenol (o-cresol)	mg/kg	500 b	U		3,400 J		U		U		270 J	
4-Methylphenol (p-cresol)	mg/kg	500 b	U		9,900		U		U		820 J	
Naphthalene	mg/kg	500 b	4,100 JD		110,000 D		7,000 JD		350 J		11,000	
Phenanthrene	mg/kg	500 b	55,000 D		690,000 D		73,000 D		2,900		79,000 D	
Phenol	mg/kg	500 b	U		4,000 J		U		U		380 J	
Pyrene	mg/kg	500 b	48,000 D		520,000 D		55,000 JD		2,500		51,000 D	
1,2,4-Trichlorobenzene	mg/kg		U		U		U		U		U	
<b>TAL Metals</b>												
Aluminum	mg/kg		5,710 J		5,790 J		5,760 J		2,190 J		6,030 J	
Antimony	mg/kg		3,090 J		692 J		417 J		720 J		407 J	
Arsenic	mg/kg	16 f	216		153		291		139		537	
Barium	mg/kg	400	2,920 J		2,200 J		540 J		3,060 J		1,340 J	
Beryllium	mg/kg	590	0.53 J		0.72 J		0.45 J		0.1 J		0.17 J	
Cadmium	mg/kg	9.3	22.6 J		7.6 J		16.3 J		11.9 J		29.5 J	
Calcium	mg/kg		21,800 J		26,000 J		30,500 J		14,600 J		60,100 J	
Chromium	mg/kg	400 k	158 J		48.8 J		87.9 J		66.2 J		55.7 J	
Cobalt	mg/kg		15.7 J		15.7 J		33.1 J		13.2 J		33.2 J	
Copper	mg/kg	270	648 J		165 J		329 J		120 J		209 J	
Iron	mg/kg		41,900 J		49,900 J		85,300 J		62,600 J		180,000 J	
Lead	mg/kg	1,000	58,800 J		74,200 J		70,100 J		64,200 J		60,100 J	
Magnesium	mg/kg		9,730 J		4,600		9,670		3,320		13,200	
Manganese	mg/kg	10,000 d	586 J		738		873		336		782	
Mercury	mg/kg	2.8 j	2.1 J		6.1 J		2.9 J		3.2 J		3 J	
Nickel	mg/kg	310	138 J		39.3 J		73.9 J		42.1 J		39.1 J	
Potassium	mg/kg		499 J		1,460 J		2,080 J		3,080 J		946 J	
Selenium	mg/kg	1,500	UJ		UJ		UJ		UJ		UJ	
Silver	mg/kg	1,500	R		R		R		R		R	
Sodium	mg/kg		420 J		255 J		552 J		799 J		245 J	
Thallium	mg/kg		8.7 J		11.3 J		13.5 J		10.7 J		15.9 J	
Vanadium	mg/kg		44.50 J		31 J		25.3 J		10.1 J		19 J	
Zinc	mg/kg	10,000 d	5,620		3,210		14,000		3,590		17,000	
<b>TCLP Metals</b>												
		TCLP Action Level										
Arsenic	mg/L	5	0.176 J		U		0.0813 J		0.0261 J		0.0937 J	
Barium	mg/L	100	0.733 J		1.5 J		0.314 J		4.170 J		1.800 J	
Cadmium	mg/L	1	0.154 J		0.0462 J		0.100 J		0.0652 J		0.105 J	
Chromium	mg/L	5	U		U		U		U		U	
Lead	mg/L	5	241 D		377 D		1,030 D		190 D		158 D	
Mercury	mg/L	0.2	U		U		U		U		U	
Selenium	mg/L	1	0.0641 J		0.116 J		UD		0.141 J		0.212 J	
Silver	mg/L	5	U		U		U		U		U	

Notes:

NA - Analyte not analyzed.

D - Sample was diluted by laboratory during analysis

J - Estimated value

U - Not detect above the sample reporting limit.

UJ - Estimated non detect

UD - Diluted sample not detected above reporting limit

TAL = Target Analyte List

R - The data are unusable. Resampling/reanalyses are necessary for verification.

mg/kg = milligrams per kilogram; mg/L = milligrams per liter

The data presented in this table was obtained from the EA Science and Technology (EA) "Final Site Characterization Report, Power City Warehouse Site (9-32-131), Niagara Falls, Niagara County, New York" dated May 2009.

d - The SCOs for metals were capped at a maximum value of 10,000 ppm.

j - This SCO is the lower of the values for mercury (elemental) or mercury (inorganic salts).

b - The SCOs for commercial use were capped at a maximum value of 500ppm.

k - Standard for hexavalent chromium

f - For constituents where calculated SCO was lower than the rural soil background concentration as determined by a rural soil survey, the rural soil background concentration is used as the Track 2 SCO for this use of the Site.

<sup>1</sup> = 6 New York Code of Rules and Regulations (NYCRR) Part 375

**Table 2**  
EA Debris Samples  
Summary of Analytical Results Detected  
Tract 1 Site - Niagara Falls, New York

Sample Location			DS-08		DS-09		DS-10		DS-11		DS-12	
Sample Number			9-32-131-DS-08		9-32-131-DS-09		9-32-131-DS-10		9-32-131-DS-11		9-32-131-DS-12	
Sample Date			9/12/2007		9/12/2007		9/12/2007		9/12/2007		9/12/2007	
Sample Type			Debris		Debris		Debris		Debris		Debris	
Parameter	Units	Restricted Use Soil Cleanup Objectives - Commercial Standard <sup>1</sup>	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier
<b>VOCS</b>												
Acetone	mg/kg	500 b	NA		U		NA		NA		NA	
Carbon disulfide	mg/kg		NA		U		NA		NA		NA	
1,3-Dichlorobenzene	mg/kg	280	NA		U		NA		NA		NA	
2-Hexanone	mg/kg		NA		U		NA		NA		NA	
4-Isopropyltoluene	mg/kg		NA		U		NA		NA		NA	
Naphthalene	mg/kg	500 b	NA		U		NA		NA		NA	
Toluene	mg/kg	500 b	NA		U		NA		NA		NA	
1,2,4-Trichlorobenzene	mg/kg		NA		U		NA		NA		NA	
1,2,4-Trimethylbenzene	mg/kg	190	NA		U		NA		NA		NA	
<b>SVOCS</b>												
Acenaphthene	mg/kg	500 b	U		280 JD		130 J		53,000 D		160 J	
Acenaphthylene	mg/kg	500 b	160 J		290 JD		250 J		3,200		570 J	
Anthracene	mg/kg	500 b	U		1,200 D		770		110,000 D		890 J	
Benzo(a)anthracene	mg/kg	5.6	U		4,100 D		2,700		180,000 D		3,600	
Benzo(a)pyrene	mg/kg	1 f	U		3,700 D		2,600		140,000 D		3,200	
Benzo(b)fluoranthene	mg/kg	5.6	3,300 JD		5,200 D		3,600		160,000 D		4,400	
Benzo(g,h,i)perylene	mg/kg	500 b	U		2,000 D		1,400		82,000 D		2,400	
Benzo(k)fluoranthene	mg/kg	56	U		1,900 D		2,000		88,000 D		1,800	
Bis(2-ethylhexyl)phthalate	mg/kg		160,000 D		170 JD		170 J		U		310 J	
Carbazole	mg/kg		U		460 JD		260 J		64,000 D		300 J	
Chrysene	mg/kg	56	2,700 JD		4,100 D		2,700		170,000 D		2,900	
Dibenzo(a,h)anthracene	mg/kg	0.56	U		630 JD		430		22,000		570 J	
Dibenzofuran	mg/kg	350	U		260 JD		120 J		36,000 D		150 J	
2,4-Dichlorophenol	mg/kg		U		U		U		U		U	
2,4-Dimethylphenol	mg/kg		U		U		U		U		U	
Di-n-butylphthalate	mg/kg		U		U		U		U		990 J	
Di-n-octylphthalate	mg/kg		U		U		80 J		U		U	
Fluoranthene	mg/kg	500 b	3,000 JD		10,000 D		6,100		640,000 D		6,000	
Fluorene	mg/kg	500 b	U		300 JD		130 J		51,000 D		190 J	
Hexachlorobenzene	mg/kg	6	U		U		U		U		U	
Indeno(1,2,3-cd)pyrene	mg/kg	5.6	U		1,900 D		1,300		73,000 D		2,200	
2-Methylnaphthalene	mg/kg		240 J		140 JD		63 J		16,000		U	
2-Methylphenol (o-cresol)	mg/kg	500 b	U		U		U		U		U	
4-Methylphenol (p-cresol)	mg/kg	500 b	U		U		U		1,100 J		U	
Naphthalene	mg/kg	500 b	210 J		290 JD		100 J		40,000 JD		170 J	
Phenanthrene	mg/kg	500 b	1,900 JD		4,000 D		2,200		570,000 D		2,200	
Phenol	mg/kg	500 b	U		U		U		960 J		U	
Pyrene	mg/kg	500 b	2,200 JD		5,600 D		3,700		410,000 D		4,000	
1,2,4-Trichlorobenzene	mg/kg		U		U		U		U		U	
<b>TAL Metals</b>												
Aluminum	mg/kg		2,740 J		1,320 J		1,770 J		3,610 J		9,880 J	
Antimony	mg/kg		1,040 J		104 J		66 J		50 J		1,090 J	
Arsenic	mg/kg	16 f	184		125		81.7		66.6		217	
Barium	mg/kg	400	2,570 J		2,570 J		3,640 J		2,320 J		674 J	
Beryllium	mg/kg	590	0.094 J		0.013 J		0.059 J		0.28 J		0.47 J	
Cadmium	mg/kg	9.3	22.5 J		13.4 J		8.9 J		8.5 J		22.8 J	
Calcium	mg/kg		20,800 J		9,300 J		19,000 J		25,500 J		9,330 J	
Chromium	mg/kg	400 k	60.3 J		37.8 J		29.9 J		51.5 J		62.2 J	
Cobalt	mg/kg		25.5 J		20.4 J		13.5 J		14.4 J		23.6 J	
Copper	mg/kg	270	6,120 J		67.3 J		70.5 J		146 J		241 J	
Iron	mg/kg		173,000 J		129,000 J		86,600 J		56,900 J		124,000 J	
Lead	mg/kg	1,000	56,500 J		74,300 J		66,500 J		71,400 J		8,910 J	
Magnesium	mg/kg		2,570		2,170		2,720		6,840		6,100	
Manganese	mg/kg	10,000 d	606		565		384		415		692	
Mercury	mg/kg	2.8 j	4.4 J		0.7 J		0.71 J		19.9 J		0.91 J	
Nickel	mg/kg	310	57.3 J		23.7 J		26.8 J		33.6 J		32.8 J	
Potassium	mg/kg		6,550 J		4,130 J		1,870 J		532 J		576 J	
Selenium	mg/kg	1,500	UJ		UJ		UJ		UJ		UJ	
Silver	mg/kg	1,500	R		R		R		R		R	
Sodium	mg/kg		900 J		346 J		263 J		73.7 J		114 J	
Thallium	mg/kg		18.8 J		20.2 J		15.4 J		14 J		13.9 J	
Vanadium	mg/kg		17.6 J		12.9 J		9 J		20.3 J		41 J	
Zinc	mg/kg	10,000 d	4,280		2,480		2,590		1,880		976	
<b>TCLP Metals</b>												
		TCLP Action Level										
Arsenic	mg/L	5	U		0.0356 J		U		U		U	
Barium	mg/L	100	8.050 J		4.230 J		1.050 J		1.540 J		0.855 J	
Cadmium	mg/L	1	0.0872 J		0.0328 J		0.0124 J		0.0517 J		0.197 J	
Chromium	mg/L	5	U		U		U		U		U	
Lead	mg/L	5	75.5 D		395 D		82.1 D		780 D		126 D	
Mercury	mg/L	0.2	U		U		U		U		U	
Selenium	mg/L	1	0.199 J		0.153 J		0.127 J		0.0894 J		0.144 J	
Silver	mg/L	5	U		U		U		U		U	

**Notes:**

NA - Analyte not analyzed.

D - Sample was diluted by laboratory during analysis

J - Estimated value

U - Not detect above the sample reporting limit.

UJ - Estimated non detect

UD - Diluted sample not detected above reporting limit

TAL = Target Analyte List

R - The data are unusable. Resampling/reanalyses are necessary for verification.

mg/kg = milligrams per kilogram; mg/L = milligrams per liter

The data presented in this table was obtained from the EA Science and Technology (EA) "Final Site Characterization Report, Power City Warehouse Site (9-32-131), Niagara Falls, Niagara County, New York" dated May 2009.

d - The SCOs for metals were capped at a maximum value of 10,000 ppm.

j - This SCO is the lower of the values for mercury (elemental) or mercury (inorganic salts).

b - The SCOs for commercial use were capped at a maximum value of 500ppm.

k - Standard for hexavalent chromium

f - For constituents where calculated SCO was lower than the rural soil background concentration as determined by a rural soil survey, the rural soil background concentration is used as the Track 2 SCO for this use of the Site.

<sup>1</sup> = 6 New York Code of Rules and Regulations (NYCRR) Part 375

**Table 2**  
EA Debris Samples  
Summary of Analytical Results Detected  
Tract 1 Site - Niagra Falls, New York

Sample Location			DS-13		DS-14		DS-15		DS-16		DS-17	
Sample Number			9-32-131-DS-13		9-32-131-DS-14		9-32-131-DS-15		9-32-131-DS-16		9-32-131-DS-17	
Sample Date			9/12/2007		9/12/2007		9/12/2007		9/12/2007		9/12/2007	
Sample Type			Debris		Debris		Debris		Debris		Debris	
Parameter	Units	Restricted Use Soil Cleanup Objectives - Commercial Standard <sup>1</sup>	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier
<b>VOCs</b>												
Acetone	mg/kg	500 b	130		UJ		NA		71		NA	
Carbon disulfide	mg/kg		38		UJ		NA		7.6		NA	
1,3-Dichlorobenzene	mg/kg	280	U		UJ		NA		UJ		NA	
2-Hexanone	mg/kg		3.3 J		UJ		NA		2.4 J		NA	
4-Isopropyltoluene	mg/kg		9.4 J		UJ		NA		UJ		NA	
Naphthalene	mg/kg	500 b	8.8 J		UJ		NA		18		NA	
Toluene	mg/kg	500 b	4.2 J		UJ		NA		UJ		NA	
1,2,4-Trichlorobenzene	mg/kg		U		UJ		NA		R		NA	
1,2,4-Trimethylbenzene	mg/kg	190	U		UJ		NA		3.1 J		NA	
<b>SVOCS</b>												
Acenaphthene	mg/kg	500 b	310 J		78,000 JD		130 J		9,300 D		U	
Acenaphthylene	mg/kg	500 b	970 J		12,000		1,400		730		420 J	
Anthracene	mg/kg	500 b	1,500 J		150,000 D		2,900		20,000 D		460 J	
Benzo(a)anthracene	mg/kg	5.6	5,200		280,000 D		9,300 D		28,000 D		880 J	
Benzo(a)pyrene	mg/kg	1 f	3,100		210,000 D		8,100 D		22,000 D		660 J	
Benzo(b)fluoranthene	mg/kg	5.6	6,000		280,000 D		10,000 D		28,000 D		780 J	
Benzo(g,h,i)perylene	mg/kg	500 b	1,800		110,000 D		4,600		13,000 D		530 J	
Benzo(k)fluoranthene	mg/kg	56	2,700		72,000		4,100		7,300 J		430 J	
Bis(2-ethylhexyl)phthalate	mg/kg		870 J		U		110 J		3,000 J		U	
Carbazole	mg/kg		800 J		95,000 JD		600		9,800 J		U	
Chrysene	mg/kg	56	6,100		240,000 D		8,400 D		26,000 D		740 J	
Dibenzo(a,h)anthracene	mg/kg	0.56	640 J		41,000		1,600		3,900 J		U	
Dibenzofuran	mg/kg	350	460 J		88,000 JD		290 J		7,100 JD		U	
2,4-Dichlorophenol	mg/kg		170 J		U		U		U		U	
2,4-Dimethylphenol	mg/kg		U		6,000		U		U		U	
Di-n-butylphthalate	mg/kg		U		U		U		U		U	
Di-n-octylphthalate	mg/kg		U		U		U		U		U	
Fluoranthene	mg/kg	500 b	18,000		690,000 D		18,000 D		85,000 D		2,000	
Fluorene	mg/kg	500 b	380 J		78,000 JD		250 J		8,800 JD		U	
Hexachlorobenzene	mg/kg	6	U		U		U		U		U	
Indeno(1,2,3-cd)pyrene	mg/kg	5.6	1,800		110,000 D		4,800		12,000 JD		360 J	
2-Methylnaphthalene	mg/kg		240 J		76,000		82 J		2,400		U	
2-Methylphenol (o-cresol)	mg/kg	500 b	U		4,500		U		U		U	
4-Methylphenol (p-cresol)	mg/kg	500 b	490 J		13,000		130 J		5,800 JD		U	
Naphthalene	mg/kg	500 b	320 J		140,000 D		190 J		5,800 J		U	
Phenanthrene	mg/kg	500 b	8,200		730,000 D		6,300 D		79,000 JD		930 J	
Phenol	mg/kg	500 b	290 J		5,600		81 J		120 J		U	
Pyrene	mg/kg	500 b	7,400		440,000 D		14,000 D		56,000 JD		1,100 J	
1,2,4-Trichlorobenzene	mg/kg		U		U		U		U		U	
<b>TAL Metals</b>												
Aluminum	mg/kg		1,340 J		7,420 J		6,560 J		2,890 J		5,170 J	
Antimony	mg/kg		277 J		144 J		135 J		1,650 J		840 J	
Arsenic	mg/kg	16 f	44.0		79.8		41.6		445		62	
Barium	mg/kg	400	109 J		3,980 J		445 J		1,050 J		148 J	
Beryllium	mg/kg	590	UJ		0.72 J		0.33 J		0.2 J		0.19 J	
Cadmium	mg/kg	9.3	4 J		5.7 J		7.1 J		11 J		3.6 J	
Calcium	mg/kg		33,900 J		38,900 J		78,800 J		18,900 J		67,100 J	
Chromium	mg/kg	400 k	13.2 J		65.9 J		37 J		76 J		20 J	
Cobalt	mg/kg		6.6 J		13.1 J		12 J		16 J		9.4 J	
Copper	mg/kg	270	93.5 J		134 J		286 J		177 J		151 J	
Iron	mg/kg		39,300 J		22,800 J		56,200 J		50,000 J		31,800 J	
Lead	mg/kg	1,000	75,000 J		66,000 J		48,300 J		73,500 J		24,300 J	
Magnesium	mg/kg		1,290		7,050		18,900		5,030		7,340	
Manganese	mg/kg	10,000 d	96.1		565		430		459		498	
Mercury	mg/kg	2.8 j	11.7 J		2.5 J		0.25 J		1.4 J		0.14 J	
Nickel	mg/kg	310	12.4 J		48.7 J		28.3 J		55.8 J		24.9 J	
Potassium	mg/kg		1,390 J		2,290 J		1,890 J		430 J		809 J	
Selenium	mg/kg	1,500	UJ		3.2 J		UJ		UJ		UJ	
Silver	mg/kg	1,500	R		R		R		R		R	
Sodium	mg/kg		538 J		341 J		199 J		153 J		111 J	
Thallium	mg/kg		8.1 J		6.7 J		8.3 J		12.3 J		3.4 J	
Vanadium	mg/kg		14.4 J		32.6 J		14.8 J		18.4 J		15.9 J	
Zinc	mg/kg	10,000 d	252		3,780		567		3,840		427	
<b>TCLP Metals</b>												
		TCLP Action Level										
Arsenic	mg/L	5	0.0272 J		U		U		U		U	
Barium	mg/L	100	0.0179 J		1.860 J		0.127 J		1.280 J		0.495 J	
Cadmium	mg/L	1	0.0051 J		0.0419 J		0.0103 J		0.0595 J		0.0044 J	
Chromium	mg/L	5	U		U		U		U		U	
Lead	mg/L	5	99.4 D		169 D		56.2 D		1,510 D		35.4 D	
Mercury	mg/L	0.2	0.00012 J		U		U		U		U	
Selenium	mg/L	1	0.217 J		0.149 J		0.168 J		U		0.242 J	
Silver	mg/L	5	U		U		U		U		U	

Notes:

NA - Analyte not analyzed.

D - Sample was diluted by laboratory during analysis

J - Estimated value

U - Not detect above the sample reporting limit.

UJ - Estimated non detect

UD - Diluted sample not detected above reporting limit

TAL = Target Analyte List

R - The data are unusable. Resampling/reanalyses are necessary for verification.

mg/kg = milligrams per kilogram; mg/L = milligrams per liter

The data presented in this table was obtained from the EA Science and Technology (EA) "Final Site Characterization Report, Power City Warehouse Site (9-32-131), Niagara Falls, Niagara County, New York" dated May 2009.

d - The SCOs for metals were capped at a maximum value of 10,000 ppm.

j - This SCO is the lower of the values for mercury (elemental) or mercury (inorganic salts).

b - The SCOs for commercial use were capped at a maximum value of 500ppm.

k - Standard for hexavalent chromium

f - For constituents where calculated SCO was lower than the rural soil background concentration as determined by a rural soil survey, the rural soil background concentration is used as the Track 2 SCO for this use of the Site.

<sup>1</sup> = 6 New York Code of Rules and Regulations (NYCRR) Part 375

**Table 2**  
EA Debris Samples  
Summary of Analytical Results Detected  
Tract 1 Site - Niagra Falls, New York

Sample Location			DS-18		DS-19		DS-20		DS-21		Basement	
Sample Number			9-32-131-DS-18		9-32-131-DS-19		9-32-131-DS-20		9-32-131-DS-21		BSMT COMPOSITE	
Sample Date			9/12/2007		9/12/2007		9/12/2007		9/12/2007		10/1/2008	
Sample Type			Debris		Debris		Debris		Debris		Debris	
Parameter	Units	Restricted Use Soil Cleanup Objectives - Commercial Standard <sup>1</sup>	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier
<b>VOCs</b>												
Acetone	mg/kg	500 b	NA		42		NA		NA		NA	
Carbon disulfide	mg/kg		NA		9.8 J		NA		NA		NA	
1,3-Dichlorobenzene	mg/kg	280	NA		4.9 J		NA		NA		NA	
2-Hexanone	mg/kg		NA		U		NA		NA		NA	
4-Isopropyltoluene	mg/kg		NA		U		NA		NA		NA	
Naphthalene	mg/kg	500 b	NA		52		NA		NA		NA	
Toluene	mg/kg	500 b	NA		U		NA		NA		NA	
1,2,4-Trichlorobenzene	mg/kg		NA		12		NA		NA		NA	
1,2,4-Trimethylbenzene	mg/kg	190	NA		U		NA		NA		NA	
<b>SVOCS</b>												
Acenaphthene	mg/kg	500 b	5,000 J		290,000 D		1,700 JD		160 J		NA	
Acenaphthylene	mg/kg	500 b	970 J		28,000		U		U		NA	
Anthracene	mg/kg	500 b	10,000		520,000 D		5,400 JD		380 J		NA	
Benzo(a)anthracene	mg/kg	5.6	24,000		820,000 D		15,000 D		1,300 J		NA	
Benzo(a)pyrene	mg/kg	1 f	19,000		570,000 D		14,000 D		1,000 J		NA	
Benzo(b)fluoranthene	mg/kg	5.6	24,000		700,000 D		20,000 D		1,600		NA	
Benzo(g,h,i)perylene	mg/kg	500 b	10,000		290,000 D		10,000 D		780 J		NA	
Benzo(k)fluoranthene	mg/kg	56	11,000		310,000 D		8,300 D		750 J		NA	
Bis(2-ethylhexyl)phthalate	mg/kg		1,400 J		U		2,200 JD		11,000		NA	
Carbazole	mg/kg		6,600 J		320,000 D		2,300 JD		290 J		NA	
Chrysene	mg/kg	56	21,000		680,000 D		16,000 D		1,600		NA	
Dibenzo(a,h)anthracene	mg/kg	0.56	3,300 J		99,000		2,300 JD		190 J		NA	
Dibenzofuran	mg/kg	350	5,400 J		330,000 D		1,100 JD		270 J		NA	
2,4-Dichlorophenol	mg/kg		U		U		U		U		NA	
2,4-Dimethylphenol	mg/kg		U		26,000		U		U		NA	
Di-n-butylphthalate	mg/kg		U		U		U		1,600		NA	
Di-n-octylphthalate	mg/kg		U		U		U		U		NA	
Fluoranthene	mg/kg	500 b	62,000		2,100,000 D		38,000 D		5,400		NA	
Fluorene	mg/kg	500 b	4,700 J		300,000 D		1,700 JD		420 J		NA	
Hexachlorobenzene	mg/kg	6	U		U		U		380 J		NA	
Indeno(1,2,3-cd)pyrene	mg/kg	5.6	9,400		270,000 D		8,900 D		590 J		NA	
2-Methylnaphthalene	mg/kg		4,000 J		270,000 D		U		230 J		NA	
2-Methylphenol (o-cresol)	mg/kg	500 b	U		21,000		U		U		NA	
4-Methylphenol (p-cresol)	mg/kg	500 b	U		62,000		U		200 J		NA	
Naphthalene	mg/kg	500 b	7,800		570,000 D		U		330 J		NA	
Phenanthrene	mg/kg	500 b	50,000		2,500,000 D		22,000 D		3,500		NA	
Phenol	mg/kg	500 b	U		27,000		U		U		NA	
Pyrene	mg/kg	500 b	37,000		1,300,000 D		28,000 D		2,800		NA	
1,2,4-Trichlorobenzene	mg/kg		U		U		U		U		NA	
<b>TAL Metals</b>												
Aluminum	mg/kg		660 J		8,890 J		693 J		1,450		4,580	
Antimony	mg/kg		3,680 J		164 J		93.7 J		376		1,660 J	
Arsenic	mg/kg	16 f	128		80.4		115		27.1		185	
Barium	mg/kg	400	733 J		2,260 J		72.5 J		349		1,060	
Beryllium	mg/kg	590	UJ		0.8 J		0.15 J		0.095 J		0.270 J	
Cadmium	mg/kg	9.3	1.8 J		7.9 J		8.7 J		4.5		117	
Calcium	mg/kg		7,060 J		34,300 J		63,500 J		3,990		24,400	
Chromium	mg/kg	400 k	19 J		66.3 J		38.5 J		20.7		145	
Cobalt	mg/kg		2.8 J		17.7 J		17.9 J		3.8		13.80 J	
Copper	mg/kg	270	90 J		142 J		297 J		312		407	
Iron	mg/kg		7,390 J		31,900 J		97,300 J		15,300		201,000	
Lead	mg/kg	1,000	59,400 J		95,900 J		4,890 J		48,700		103,000	
Magnesium	mg/kg		3,410		7,690		406		1,540		5,380	
Manganese	mg/kg	10,000 d	84.5		598		147		92.9		959 J	
Mercury	mg/kg	2.8 j	0.31 J		2 J		0.52 J		1.2		1.70	
Nickel	mg/kg	310	44.7 J		47.8 J		11.8 J		19		129 J	
Potassium	mg/kg		161 J		1,560 J		194 J		221		700	
Selenium	mg/kg	1,500	UJ		1.6 J		UJ		U		2.30 J	
Silver	mg/kg	1,500	6.4 J		R		R		U		18.80	
Sodium	mg/kg		57.2 J		181 J		14,200 J		U		491	
Thallium	mg/kg		7.9 J		7.4 J		9.9 J		4.1		U	
Vanadium	mg/kg		3.20 J		32.6 J		23.4 J		10.2		16.10	
Zinc	mg/kg	10,000 d	265		3,330		299		465		4,140 J	
<b>TCLP Metals</b>												
		TCLP Action Level										
Arsenic	mg/L	5	0.494 J		0.0636 J		U		0.0247		NA	
Barium	mg/L	100	0.476 J		3.240 J		0.0269 J		0.443		NA	
Cadmium	mg/L	1	0.017 J		0.0437 J		U		0.0405		NA	
Chromium	mg/L	5	U		0.004 J		0.0011 J		U		NA	
Lead	mg/L	5	1,520 D		1,630 D		5.31 D		1,050 D		NA	
Mercury	mg/L	0.2	U		U		U		U		NA	
Selenium	mg/L	1	U		0.0562 J		0.279 J		U		NA	
Silver	mg/L	5	U		U		U		U		NA	

**Notes:**

NA - Analyte not analyzed.

D - Sample was diluted by laboratory during analysis

J - Estimated value

U - Not detect above the sample reporting limit.

UD - Estimated non detect

UJ - Diluted sample not detected above reporting limit

TAL = Target Analyte List

R - The data are unusable. Resampling/reanalyses are necessary for verification.

mg/kg = milligrams per kilogram; mg/L = milligrams per liter

The data presented in this table was obtained from the EA Science and Technology (EA) "Final Site Characterization Report, Power City Warehouse Site (9-32-131), Niagara Falls, Niagara County, New York" dated May 2009.

d - The SCOs for metals were capped at a maximum value of 10,000 ppm.

j - This SCO is the lower of the values for mercury (elemental) or mercury (inorganic salts).

b - The SCOs for commercial use were capped at a maximum value of 500ppm.

k - Standard for hexavalent chromium

f - For constituents where calculated SCO was lower than the rural soil background concentration as determined by a rural soil survey, the rural soil background concentration is used as the Track 2 SCO for this use of the Site.

<sup>1</sup> = 6 New York Code of Rules and Regulations (NYCRR) Part 375



**Table 3**

EA Shallow Subsurface Soil Samples  
Summary of Analytical Results Detected  
Tract I Site - Niagara Falls, New York

Sample Location/Boring I.D.			SB-01		SB-02		SB-03		SB-04		SB-05		SB-06		SB-07	
Sample Number			9-32-131-SB-01S		9-32-131-SB-02S		9-32-131-SB-03S		9-32-131-SB-04S		9-32-131-SB-05S		9-32-131-SB-06S		9-32-131-SB-07S	
Sample Date			9/30/2008		9/30/2008		9/30/2008		9/30/2008		9/30/2008		9/30/2008		9/30/2008	
Sample Type			Subsurface Soil		Subsurface Soil		Subsurface Soil		Subsurface Soil		Subsurface Soil		Subsurface Soil		Subsurface Soil	
Sample Depth*			0-2 feet		0-2 feet		0-2 feet		0-2 feet		0-2 feet		0-2 feet		0-2 feet	
Parameter	Units	Restricted Use Soil Cleanup Objectives - Commercial Standard <sup>1</sup>	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier
<b>TAL Metals</b>																
Aluminum	mg/kg		14,500 J		11,100 J		9,430 J		15,200 J		9,460 J		16,800 J		13,500 J	
Antimony	mg/kg		ND U J		ND U J		0.270 U J		ND U J		ND U J		ND U J		ND U J	
Arsenic	mg/kg	16	4.60 J		3.30 J		3.30 J		4.70 J		4.40 J		4.10 J		5.40 J	
Barium	mg/kg	400	110 J		90.80 J		63.60 J		102 J		61.40 J		94.90 J		141 J	
Beryllium	mg/kg	590	0.750 J		0.50 J		0.440 J		0.740 J		0.480 J		0.720 J		0.60 J	
Cadmium	mg/kg	9.3	0.210 J		0.130 J		0.130 J		0.180 J		0.130 J		0.250		0.290	
Calcium	mg/kg		74,200		66,000		55,500		77,700		3,340		45,500		43,800	
Chromium	mg/kg	400 k	22.60 J		16.30 J		12.90 J		21.50 J		13.40 J		20.50 J		32.20 J	
Cobalt	mg/kg		26.40 J		8.80 J		9.00 J		8.90 J		10.20 J		11.70 J		8.30 J	
Copper	mg/kg	270	27.60		19.30		33.90		28.70		20.80		24.30		28.30	
Iron	mg/kg		31,900		27,100		23,400		29,000		22,400		29,000		25,100	
Lead	mg/kg	1,000	34.0		6.0		45.0		20.70		5.60		18.0		55.0	
Magnesium	mg/kg		11,200 J		9,090 J		9,130 J		11,200 J		4,540 J		10,200 J		7930 J	
Manganese	mg/kg	10,000 d	606 J		652 J		682 J		449 J		976 J		661 J		597.0 J	
Mercury	mg/kg	2.8 j	ND U		ND U		0.0150 J		ND U		ND U		ND U		ND U	
Nickel	mg/kg	310	25.90 J		19.90 J		17.70 J		22.20 J		21.40 J		23.80 J		19.70 J	
Potassium	mg/kg		2,620 J		1,710 J		1,480 J		2,530 J		1,090 J		2,280 J		2,480 J	
Selenium	mg/kg	1,500	ND		ND		ND		ND		ND		ND		ND U	
Silver	mg/kg	1,500	ND		ND		ND		ND		ND		ND		ND U	
Sodium	mg/kg		161.00 J		137 J		125 J		168 J		91.0 J		155 J		131 J	
Thallium	mg/kg		ND		ND		ND		ND		ND		ND		ND U	
Vanadium	mg/kg		30.60 J		20.70 J		19.40 J		30.80 J		19.90 J		28.90 J		23.50 J	
Zinc	mg/kg	10,000 d	52.50 J		39.0 J		39.20 J		48.20 J		44.40 J		65.80 J		74.40 J	

**Notes:**

U - Not detect above the sample reporting limit.

J - Estimated value

UJ - Estimated non detect

ND - Analyte not detected above reporting limit

TAL = Target Analyte List

k - Standard for hexavalent chromium

The data presented in this table was obtained from the EA Science and Technology (EA) "Final Site Characterization Report, Power City Warehouse Site (9-32-131), Niagara Falls, Niagara County, New York" dated May 2009.

d - The SCOs for metals were capped at a maximum value of 10,000 ppm.

j - This SCO is the lower of the values for mercury (elemental) or mercury (inorganic salts).

\* = Depths are as reported in the EA report text referenced above.

<sup>1</sup> = 6 New York Code of Rules and Regulations (NYCRR) Part 375

**Table 3**

EA Shallow Subsurface Soil Samples  
Summary of Analytical Results Detected  
Tract I Site - Niagara Falls, New York

Sample Location/Boring I.D.			SB-08		SB-09		SB-10		SB-11		SB-12		SB-13		SB-14	
Sample Number			9-32-131-SB-08S		9-32-131-SB-09S		9-32-131-SB-10S		9-32-131-SB-11S		9-32-131-SB-12S		9-32-131-SB-13S		9-32-131-SB-14S	
Sample Date			9/30/2008		9/30/2008		9/30/2008		9/30/2008		9/30/2008		9/30/2008		9/30/2008	
Sample Type			Subsurface Soil		Subsurface Soil		Subsurface Soil		Subsurface Soil		Subsurface Soil		Subsurface Soil		Subsurface Soil	
Sample Depth*			0-2 feet		0-2 feet		0-2 feet		0-2 feet		0-2 feet		0-2 feet		0-2 feet	
Parameter	Units	Restricted Use Soil Cleanup Objectives - Commercial Standard <sup>1</sup>	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier
<b>TAL Metals</b>																
Aluminum	mg/kg		7,500 J		18,200 J		18,700 J		4,140 J		13,100 J		13,300 J		24,500 J	
Antimony	mg/kg		30.90 J		ND U J		2.20 J		ND U J		8.30 J		ND U J		ND U J	
Arsenic	mg/kg	16	9.50 J		5.0 J		4.90 J		4.30 J		4.40 J		2.10 J		5.90 J	
Barium	mg/kg	400	90.10 J		133.0 J		151 J		80.40 J		71.70 J		91.70 J		174 J	
Beryllium	mg/kg	590	0.850 J		1.0 J		0.920 J		0.50 J		0.510 J		0.540 J		1.80 J	
Cadmium	mg/kg	9.3	0.590		0.130 J		0.240 J		0.260		0.430		2.80		0.260	
Calcium	mg/kg		40,800 J		3,100		63,600		60,100		61,900		93,600		2,790	
Chromium	mg/kg	400 k	10.10 J		24.70 J		28.30 J		2,060 J		9.80 J		32.20 J		32.20 J	
Cobalt	mg/kg		6.20 J		11.0 J		12.40 J		62.00 J		7.30 J		6.0 J		15.50 J	
Copper	mg/kg	270	85.90 J		27.20		27.40		43.90		25.60		25.80		36.50	
Iron	mg/kg		31,000		34,600		38,000		5,970		28,000		7,110		46,200	
Lead	mg/kg	1,000	9,410 J		9.90		52.50		148		1,160		24.50		15.70	
Magnesium	mg/kg		4,320 J		5,840 J		11,400 J		25,400 J		10,900 J		46,300 J		7,960 J	
Manganese	mg/kg	10,000 d	368.0 J		470 J		556 J		339 J		613 J		510 J		601 J	
Mercury	mg/kg	2.8 j	0.280 J		ND U		0.094		0.10		0.0880		0.0770		ND U	
Nickel	mg/kg	310	9.80 J		28.30 J		31.30 J		58.30 J		12.40 J		20.40 J		38.0 J	
Potassium	mg/kg		847 J		1,770 J		4,040 J		1,270 J		1,010 J		1,060 J		2,860 J	
Selenium	mg/kg	1,500	ND U		ND U		ND U		ND U		ND U		1.80 J		ND U	
Silver	mg/kg	1,500	0.150 J		ND U		ND U		ND U		ND U		ND U		ND U	
Sodium	mg/kg		266 J		96.10 J		159 J		179 J		82.50 J		88.40 J		77.90 J	
Thallium	mg/kg		ND U		ND U		ND U		0.670 J		ND U		ND U		ND U	
Vanadium	mg/kg		12.90 J		33.90 J		36.50 J		25.70 J		14.40 J		38.10 J		40.60 J	
Zinc	mg/kg	10,000 d	168.0 J		59.60 J		65.40 J		50.50 J		119 J		5,490 J		86.90 J	

**Notes:**

U - Not detect above the sample reporting limit.

J - Estimated value

UJ - Estimated non detect

ND - Analyte not detected above reporting limit

TAL = Target Analyte List

k - Standard for hexavalent chromium

The data presented in this table was obtained from the EA Science and Technology (EA) "Final Site Characterization Report, Power City Warehouse Site (9-32-131), Niagara Falls, Niagara County, New York" dated May 2009.

d - The SCOs for metals were capped at a maximum value of 10,000 ppm.

j - This SCO is the lower of the values for mercury (elemental) or mercury (inorganic salts).

\* = Depths are as reported in the EA report text referenced above.

<sup>1</sup> = 6 New York Code of Rules and Regulations (NYCRR) Part 375

**Table 3**

EA Shallow Subsurface Soil Samples  
Summary of Analytical Results Detected  
Tract I Site - Niagara Falls, New York

Sample Location/Boring I.D.			SB-15	SB-16	SB-17	SB-18	SB-20	SB-21	SB-22	SB-23
Sample Number			9-32-131-SB-15S	9-32-131-SB-16S	9-32-131-SB-17S	9-32-131-SB-18S	9-32-131-SB-20S	9-32-131-SB-21S	9-32-131-SB-22S	9-32-131-SB-23S
Sample Date			9/30/2008	9/30/2008	10/1/2008	10/1/2008	10/1/2008	10/1/2008	10/1/2008	10/1/2008
Sample Type			Subsurface Soil	Subsurface Soil	Subsurface Soil	Subsurface Soil	Subsurface Soil	Subsurface Soil	Subsurface Soil	Subsurface Soil
Sample Depth*			0-2 feet	0-2 feet	0-2 feet	0-2 feet	0-2 feet	0-2 feet	0-2 feet	0-2 feet
Parameter	Units	Restricted Use Soil Cleanup Objectives - Commercial Standard <sup>1</sup>	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier
<b>TAL Metals</b>										
Aluminum	mg/kg		22,300		11,300		11,000		8,330	
Antimony	mg/kg		ND U J		ND U		ND U J		ND U J	
Arsenic	mg/kg	16	2.40		5.40		2.80		6.30	
Barium	mg/kg	400	72.40		70.10		76.30		62.80	
Beryllium	mg/kg	590	0.90		0.490		0.40		0.250 J	
Cadmium	mg/kg	9.3	ND U		ND U		ND U		0.67	
Calcium	mg/kg		31,400		55,500		2,670		1,320	
Chromium	mg/kg	400 k	28.30		15.10		9.10		7.60	
Cobalt	mg/kg		8.0 J		9.60 J		5.60 J		3.60 J	
Copper	mg/kg	270	24.10		22.20		17.30		19.40	
Iron	mg/kg		32,400		24,500		14,900		13,300	
Lead	mg/kg	1,000	14.80		5.30		5.30		15.60	
Magnesium	mg/kg		12,500		8,620		2,570		2,110	
Manganese	mg/kg	10,000 d	311 J		859		762.0 J		239.0 J	
Mercury	mg/kg	2.8 j	ND U		ND U		ND U		ND U	
Nickel	mg/kg	310	25.80		20.90 J		11.10 J		9.00 J	
Potassium	mg/kg		3,700		2,000		806		642	
Selenium	mg/kg	1,500	ND U		ND U		ND U		ND U	
Silver	mg/kg	1,500	ND U		ND U		ND U		ND U	
Sodium	mg/kg		230		140		43.50 J		33.70 J	
Thallium	mg/kg		ND U		ND U		ND U		ND U	
Vanadium	mg/kg		33.60		22.40		19.10		14.80	
Zinc	mg/kg	10,000 d	60.30 J		42.30 J		30.30 J		45.0 J	

**Notes:**

U - Not detect above the sample reporting limit.

J - Estimated value

UJ - Estimated non detect

ND - Analyte not detected above reporting limit

TAL = Target Analyte List

k - Standard for hexavalent chromium

The data presented in this table was obtained from the EA Science and Technology (EA) "Final Site Characterization Report, Power City Warehouse Site (9-32-131), Niagara Falls, Niagara County, New York" dated May 2009.

d - The SCOs for metals were capped at a maximum value of 10,000 ppm.

j - This SCO is the lower of the values for mercury (elemental) or mercury (inorganic salts).

\* = Depths are as reported in the EA report text referenced above.

<sup>1</sup> = 6 New York Code of Rules and Regulations (NYCRR) Part 375

Table 4

EA Deep Subsurface Soil Samples  
Summary of Analytical Results Detected  
Tract I Site - Niagara Falls, New York

Sample Location/Boring I.D.			SB-01		SB-06		SB-09		SB-12		SB-13		SB-17		SB-18		SB-19		SB-23	
Sample Number			9-32-131-SB-01D(6-8)		9-32-131-SB-06D(5-6)		9-32-131-SB-09D(6-7)		9-32-131-SB-12D(6-7)		9-32-131-SB-13D(6-7)		9-32-131-SB-17(5-6)		9-32-131-SB-18(4-7)		9-32-131-SB-19(4-7)		9-32-131-SB-23S(3-4)	
Sample Date			9/30/2008		9/30/2008		9/30/2008		9/30/2008		9/30/2008		10/1/2008		10/1/2008		10/1/2008		10/1/2008	
Sample Type			Subsurface Soil		Subsurface Soil		Subsurface Soil		Subsurface Soil		Subsurface Soil		Subsurface Soil		Subsurface Soil		Subsurface Soil		Subsurface Soil	
Sample Depth			6-8 feet		5-6 feet		6-7 feet		6-7 feet		6-7 feet		5-6 feet		4-7 feet		4-7 feet		3-4 feet	
Parameter	Units	Restricted Use Soil Cleanup Objectives - Commercial Standard <sup>1</sup>	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier	Result Value	Qualifier
<b>VOCs</b>																				
Acetone	mg/kg	500 b	<0.00640 U R		0.150 J		0.0480 J		0.0130 J		0.0460 J		<0.00650 U		0.0450		0.10		0.00330 J	
2-Butanone	mg/kg	500 b	<0.00640 U R		0.0280 J		<6.30 U		<0.00610 U R		0.0070 J		<0.00650 U		<0.0130 U		0.0220		<0.00580 U	
n-Butylbenzene	mg/kg	500 b	0.020 J		0.0220		0.0170		<0.00610 U		<0.00650 U		<0.00650 U		<0.0130 U		0.0120		<0.00580 U	
sec-Butylbenze	mg/kg	500 b	0.00460 J		0.0053 J		0.0081		0.00260 J		<0.00650 U		<0.00650 U		<0.0130 U		0.0080 J		<0.00580 U	
Isopropylbenzene	mg/kg		<0.00640 U		0.010 J		0.00370 J		<0.00610 U		<0.00650 U		<0.00650 U		<0.0130 U		0.00450 J		<0.00580 U	
Methylene chloride	mg/kg	500 b	<0.00640 U		<0.0130 U		<0.00810 U		<0.00610 U		<0.00650 U		<0.00650 U		<0.0130 U		<0.00810 U		0.00160 J	
Naphthalene	mg/kg	500 b	<0.00640 U		0.0480		0.00630		<0.00610 U		<0.00650 U		<0.00650 U		<0.0130 U		<0.00810 U		<0.00580 U	
n-Propylbenzene	mg/kg	500 b	<0.00640 U		0.0130		0.00480 J		<0.00610 U		<0.00650 U		<0.00650 U		<0.0130 U		0.00410 J		<0.00580 U	
Toluene	mg/kg	500 b	<0.00640 U		<0.0130 U		0.00550 J		<0.00610 U		0.00380 J		<0.00650 U		<0.0130 U		0.0160		0.00420 J	
Trichloroethene	mg/kg	200	<0.00640 U		<0.0130 U		0.0120		0.00370 J		0.0120		0.00860		<0.0130 U		0.0420		0.00510 J	
1,2,4-Trimethylbenzene	mg/kg	190	0.10 J		0.10		0.0830		<0.00610 U		<0.00650 U		<0.00650 U		<0.0130 U		<0.00810 U		<0.00580 U	
1,3,5-Trimethylbenzene	mg/kg	190	0.0740 J		0.0620		<0.00810 U		<0.00610 U		<0.00650 U		<0.00650 U		<0.0130 U		<0.00810 U		<0.00580 U	
m,p-Xylene	mg/kg	500 b	0.00530 J		<0.0130 U		<0.00810 U		<0.00610 U		<0.00650 U		<0.00650 U		<0.0130 U		<0.00810 U		<0.00580 U	
Xylene (Total)	mg/kg	500 b	0.00530 J		<0.0130 U		<0.00810 U		<0.00610 U		<0.00650 U		<0.00650 U		<0.0130 U		<0.00810 U		<0.00580 U	
<b>SVOCs</b>																				
Acenaphthene	mg/kg	500 b	<0.440 U		0.220 J		<0.420 U		<0.410 U		<0.410 U		<0.440 U		0.180 J		1.50		<0.390 U	
Anthracene	mg/kg	500 b	<0.440 U		0.290 J		<0.420 U		<0.410 U		<0.410 U		<0.440 U		0.150 J		1.20		<0.390 U	
Benzo(a)anthracene	mg/kg	5.6	<0.440 U		0.180 J		0.140 J		<0.410 U		<0.410 U		<0.440 U		<0.450 U		0.40 J		<0.390 U	
Benzo(a)pyrene	mg/kg	1 f	<0.440 U		0.10 J		0.120 J		<0.410 U		<0.410 U		<0.440 U		<0.450 U		0.210 J		<0.390 U	
Benzo(b)fluoranthene	mg/kg	5.6	<0.440 U		0.120 J		0.190 J		<0.410 U		<0.410 U		<0.440 U		<0.450 U		0.230 J		<0.390 U	
Bis(2-ethylhexyl)phthalate	mg/kg		<0.440 U		<0.40 U		0.130 J		<0.410 U		<0.410 U		<0.440 U		<0.450 U		<0.470 U		<0.390 U	
Chrysene	mg/kg	56	<0.440 U		0.160 J		0.160 J		<0.410 U		0.140 J		<0.440 U		0.150 J		0.490		<0.390 U	
Dibenzofuran	mg/kg	350	<0.440 U		0.160 J		<0.420 U		<0.410 U		<0.410 U		<0.440 U		<0.450 U		0.290 J		<0.390 U	
Fluoranthene	mg/kg	500 b	<0.440 U		0.520		0.300 J		<0.410 U		0.160 J		<0.440 U		0.180 J		1.10		<0.390 U	
Fluorene	mg/kg	500 b	<0.440 U		0.260 J		<0.420 U		0.120 J		<0.410 U		<0.440 U		<0.450 U		1.70		<0.390 U	
2-Methylnaphthalene	mg/kg		0.10 J		0.480		<0.420 U		<0.410 U		<0.410 U		<0.440 U		0.10 J		0.210 J		<0.390 U	
Naphthalene	mg/kg	500 b	<0.440 U		<0.40 U		<0.420 U		<0.410 U		<0.410 U		<0.440 U		<0.450 U		0.450 J		<0.390 U	
Phenanthrene	mg/kg	500 b	0.150 J		0.990		0.180 J		0.310 J		<0.410 U		<0.440 U		<0.450 U		1.10		<0.390 U	
Pyrene	mg/kg	500 b	<0.440 U		0.390 J		0.220 J		0.120 J		0.140 J		<0.440 U		0.220 J		1.30		<0.390 U	

## Notes:

The data presented in this table was obtained from the EA Science and Technology (EA) "Final Site Characterization Report, Power City Warehouse Site (9-32-131), Niagara Falls, Niagara County, New York" dated May 2009.

b - The SCOs for commercial use were capped at a maximum value of 500ppm.

f - For constituents where calculated SCO was lower than the rural soil background concentration as determined by a rural soil survey, the rural soil background concentration is used as the SCO for use at the Site.

U - Analyte not detected above the sample reporting limit.

R - Rejected

J - Estimated value.

<sup>1</sup> = 6 New York Code of Rules and Regulations (NYCRR) Part 375

**Table 5**  
AMEC Surface Soil Samples  
Summary of Analytical Results Detected  
Tract I Site - Niagara Falls, New York

Sample Location/Boring I.D.			B-10		B-11		B-12		B-13		B-14		B-15		B-16		B-17		B-18		B-19		B-20	
Sample Number			B-10-SURF		B-11-SURF		B-12-SURF		B-13-SURF		B-14-SURF		B-15-SURF		B-16-SURF		B-17-SURF		B-18-SURF		B-19-SURF		B-20-SURF	
Sample Date			7/14/2011		7/14/2011		7/14/2011		7/14/2011		7/14/2011		7/14/2011		7/14/2011		7/14/2011		7/14/2011		7/14/2011		7/14/2011	
Sample Type			Surface Soil		Surface Soil		Surface Soil		Surface Soil		Surface Soil		Surface Soil		Surface Soil		Surface Soil		Surface Soil		Surface Soil		Surface Soil	
Sample Depth			0-6"		0-6"		0-6"		0-6"		0-6"		0-6"		0-6"		0-6"		0-6"		0-6"		0-6"	
Parameter	Units	Commercial Standard/ TCLP	Result Value	Qual	Result Value	Qual	Result Value	Qual	Result Value	Qual	Result Value	Qual	Result Value	Qual	Result Value	Qual	Result Value	Qual	Result Value	Qual	Result Value	Qual	Result Value	Qual
<b>Metals</b>																								
Antimony	mg/kg		101		68.3		15.4		41.2		15.9 U		14.8		14.6 U		63.8		192		29.7		18.6 U	
Lead	mg/kg	1,000 a	7,940		6,430		3,130		4,130		1,210		1,660		1,230		2,280		16,900		1,730		2,630	
Tin	mg/kg		20.4		9.5		6.7		18.3		50.7		9		6.2		20.8		48.7		53.1		8.8	
<b>TCLP</b>																								
TCLP-Lead	mg/L	5 b	18.4		46.5		1.5		2.7		1		1.9		1.3		21		69.7		0.6		1.8	
<b>pH - standard units (S.U.)</b>																								
pH	S.U.		7.8		8.25		7.98		7.89		7.98		7.96		8.04		7.09		7.63		7.16		7.67	
<b>XRF Screening Results</b>																								
Lead	ppm	1,000 a	1,073		2,510		NA		NA		NA		NA		NA		NA		NA		1,521		1,772	
Tin	ppm		1,263		2,480		NA		NA		NA		NA		NA		NA		NA		5,584		4,158	

Notes:  
U = Analyte not detected by laboratory above the reporting limit  
a = Restricted Use Soil Cleanup Objectives - Commercial Standard - 6 New York Code of Rules and Regulations (NYCRR) Part 375  
b = NY DEC Hazardous Waste TCLP Regulatory Action Level  
TCLP = Toxicity Characteristic Leaching Procedure  
mg/kg = milligrams per kilogram (ppm)  
mg/L = milligrams per liter (ppm)  
ppm = parts per million  
Qual = qualifier

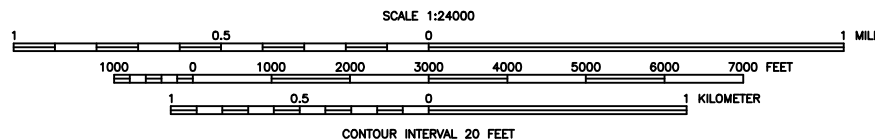
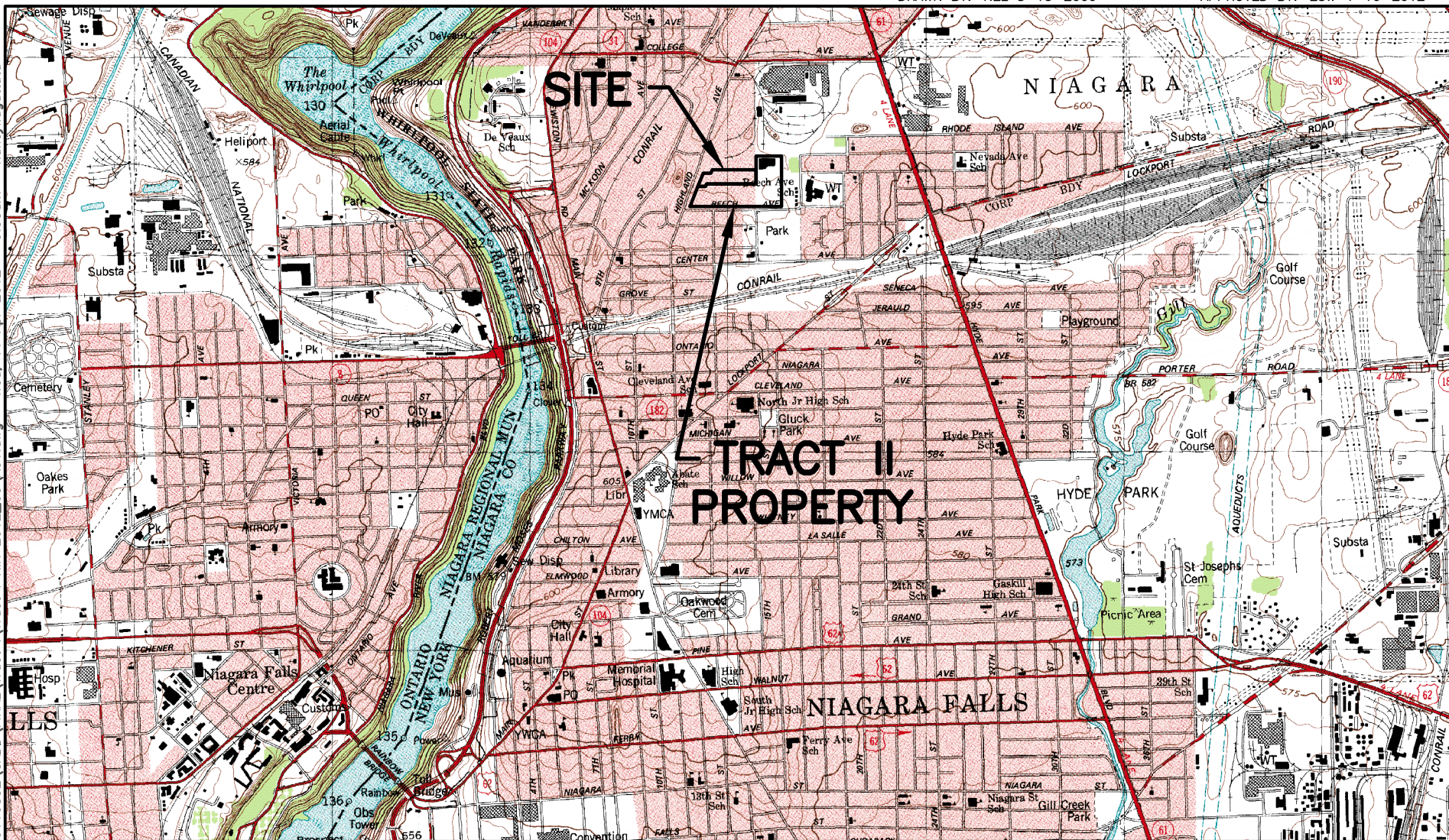
## FIGURES



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DRAWN BY: NEL 8-13-2009

APPROVED BY: ESW 4-10-2012



HONEYWELL INTERNATIONAL INC.  
NIAGARA FALLS, NEW YORK

Project No.: 3410110832



Environment & Infrastructure - Pittsburgh  
800 North Bell Avenue 2200 Georgetown Drive  
Carnegie, Pennsylvania 15106 Sewickley, Pennsylvania 15143

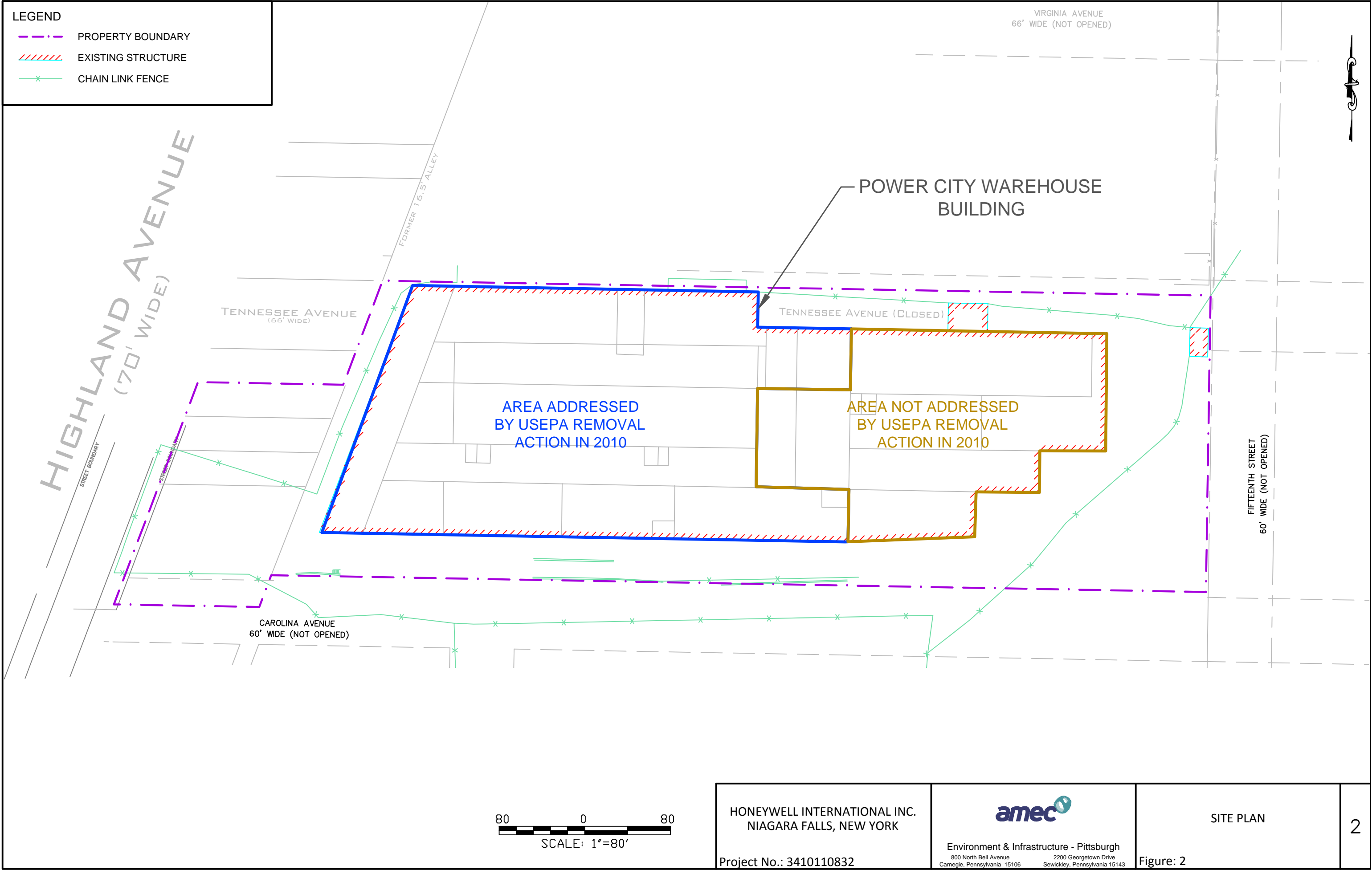
SITE LOCATION MAP

Figure: 1

1



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LEGEND

PROPERTY BOUNDARY

EXISTING STRUCTURE

CHAIN LINK FENCE

10b

E&E SAMPLE LOCATION

SD-PCW-01

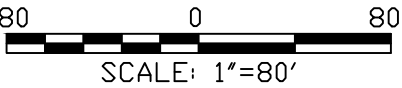
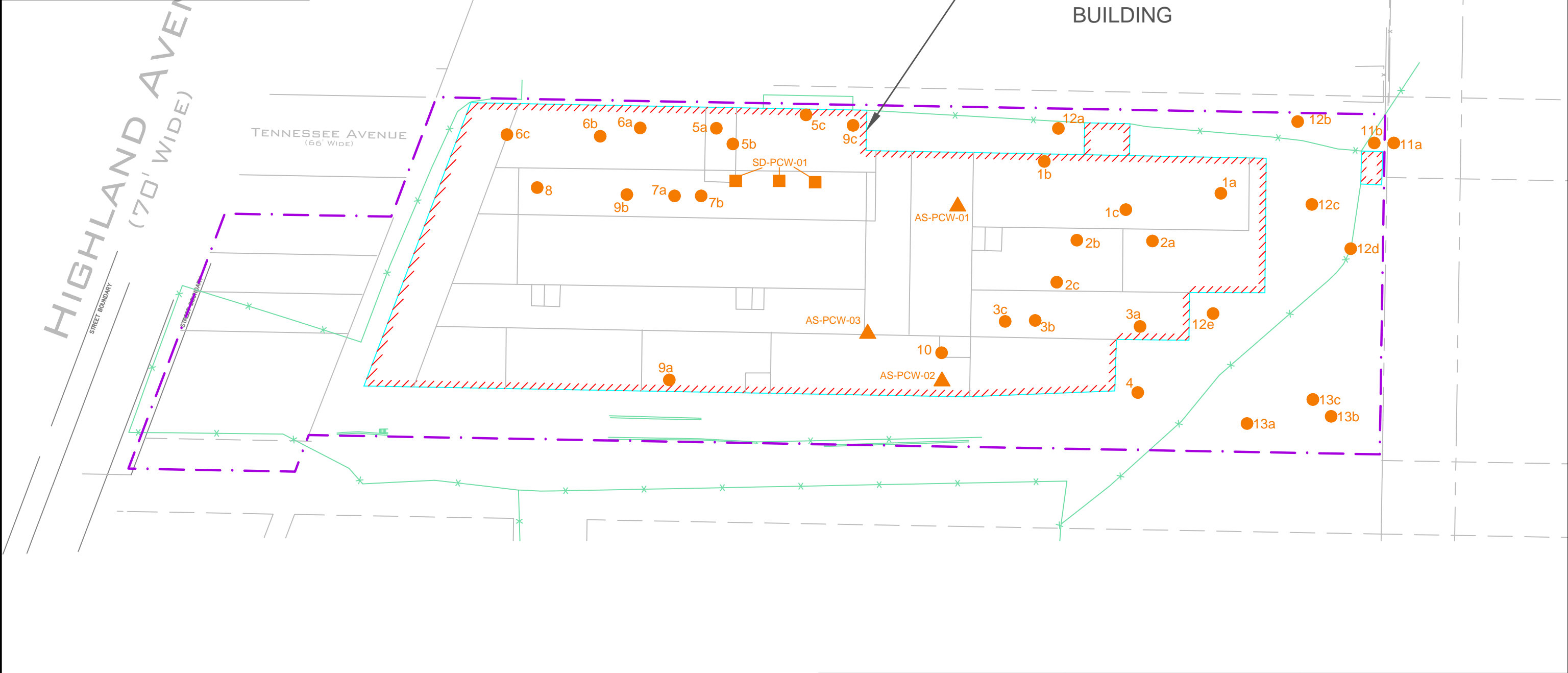
E&E COMPOSITE SEDIMENT/SLUDGE  
SAMPLE LOCATION

AS-PCW-03

E&E ASBESTOS SAMPLE LOCATION

NOTES:

SAMPLE LOCATIONS ARE APPROXIMATE.



LEGEND

PROPERTY BOUNDARY

EXISTING STRUCTURE

SB-02

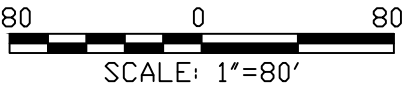
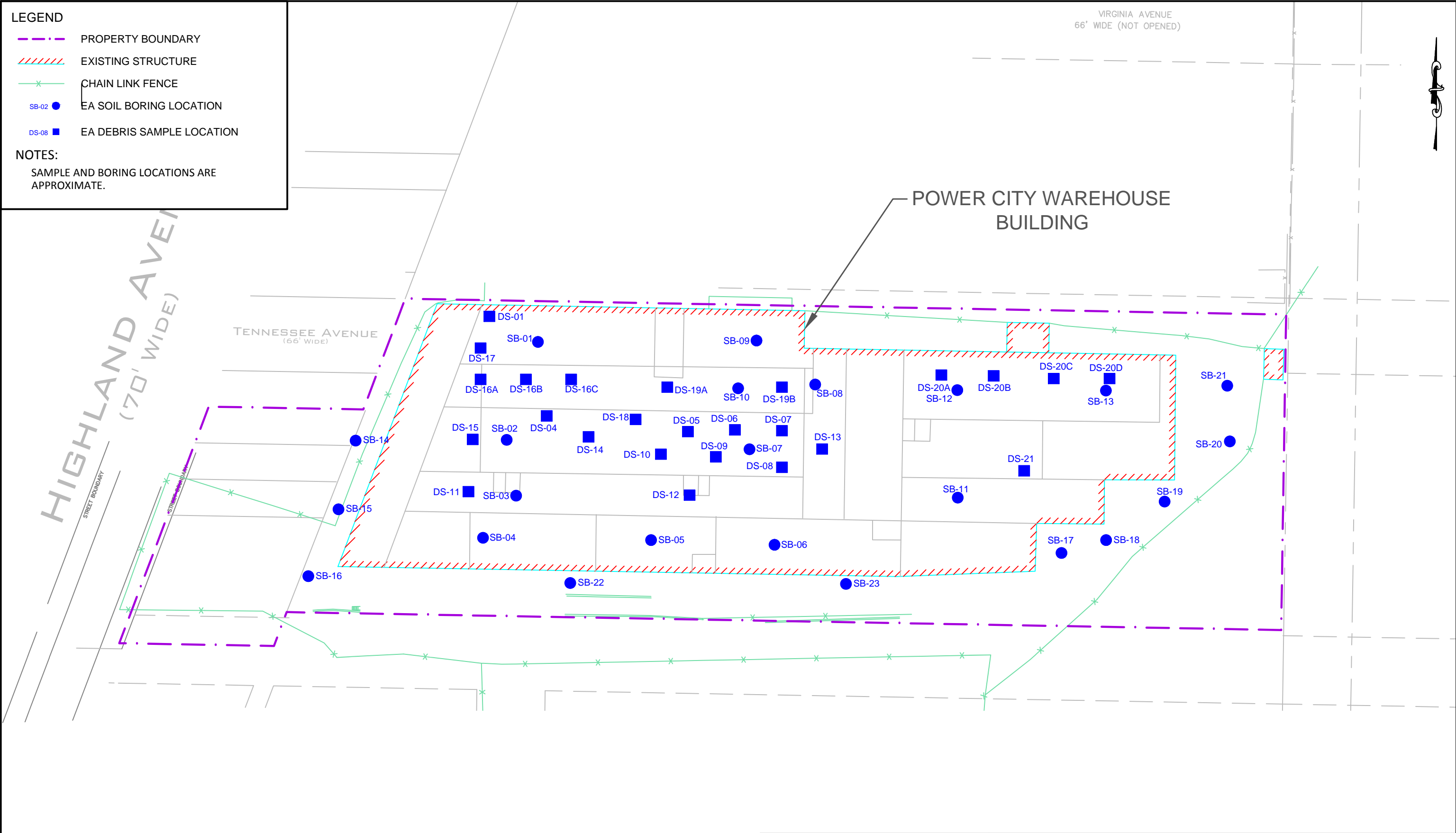
EA SOIL BORING LOCATION

DS-08

EA DEBRIS SAMPLE LOCATION

NOTES:

SAMPLE AND BORING LOCATIONS ARE APPROXIMATE.

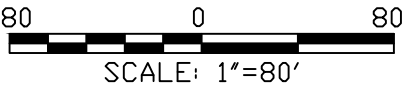
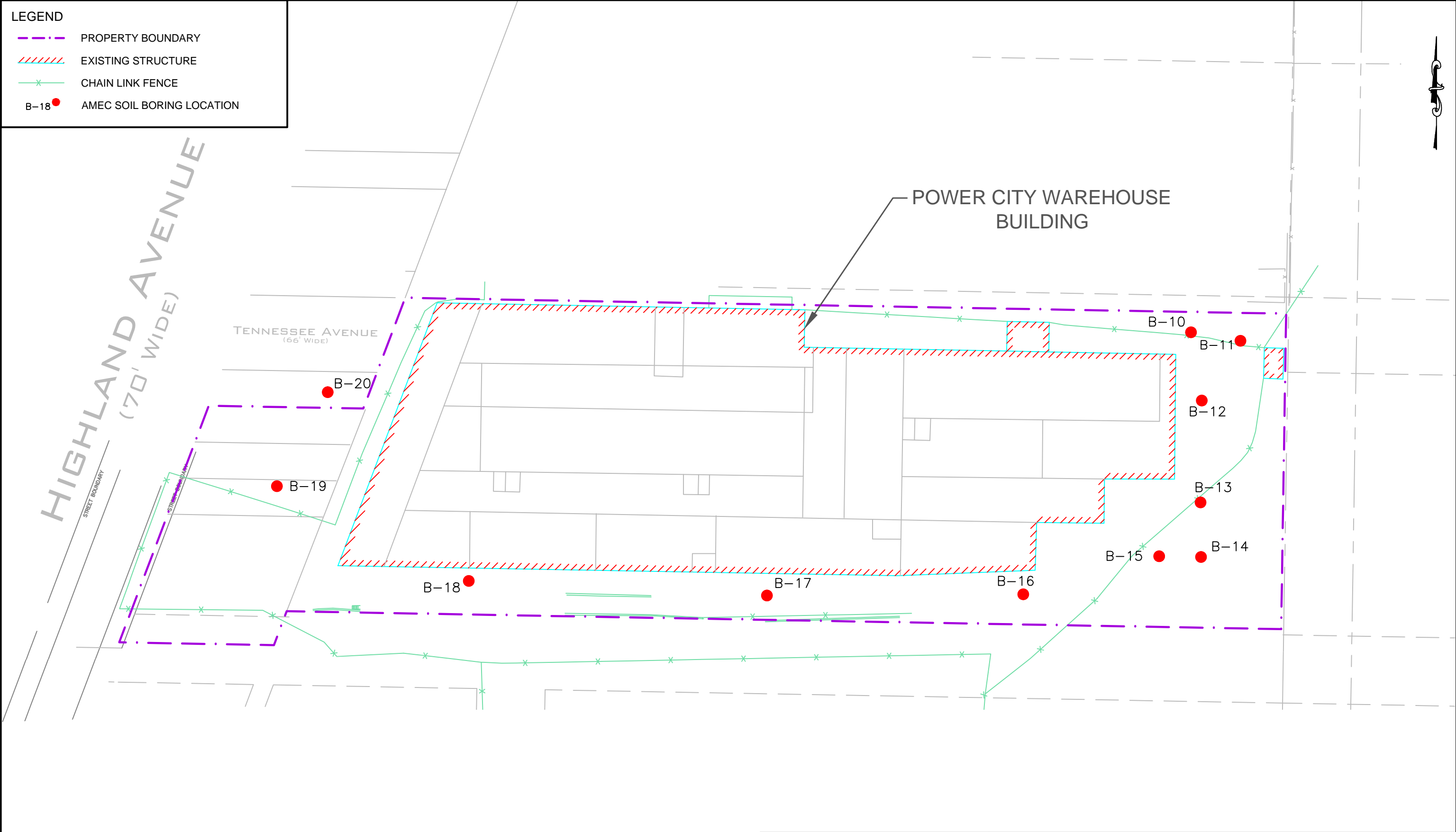


LEGEND

PROPERTY BOUNDARY

EXISTING STRUCTURE

B-18



<div>HONEYWELL INTERNATIONAL INC. NIAGARA FALLS, NEW YORK</div> <div>Project No.: 3410110832</div>	<div></div> <div>Environment &amp; Infrastructure - Pittsburgh 800 North Bell Avenue Carnegie, Pennsylvania 15106</div> <div>2200 Georgetown Drive Sewickley, Pennsylvania 15143</div>	<div>AMEC PREDESIGN STUDY SAMPLE LOCATION MAP</div> <div>Figure: 5</div>	<div>5</div>
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LEGEND

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PROPERTY BOUNDARY

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EXISTING STRUCTURE

\*

CHAIN LINK FENCE

10b

E&E SAMPLE LOCATION

SD-PCW-01

E&E COMPOSITE SEDIMENT/SLUDGE SAMPLE LOCATION

AS-PCW-03

E&E ASBESTOS SAMPLE LOCATION

J

ESTIMATED VALUE

D

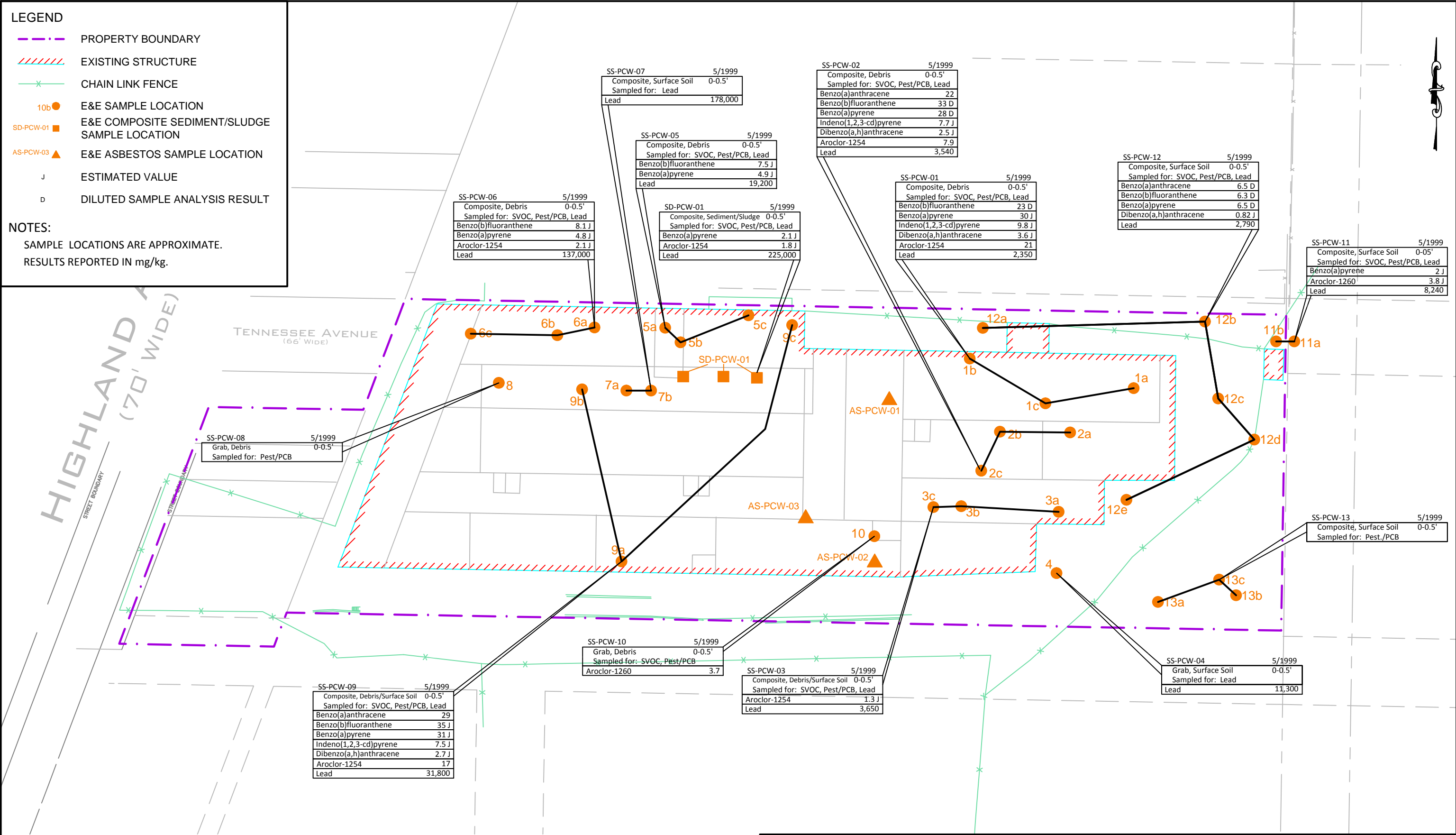
DILUTED SAMPLE ANALYSIS RESULT

NOTES:

SAMPLE LOCATIONS ARE APPROXIMATE.

RESULTS REPORTED IN mg/kg.

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- LEGEND**
- PROPERTY BOUNDARY
  - EXISTING STRUCTURE
  - CHAIN LINK FENCE
  - EA DEBRIS SAMPLE LOCATION
  - ESTIMATED VALUE
  - DILUTED SAMPLE ANALYSIS RESULT

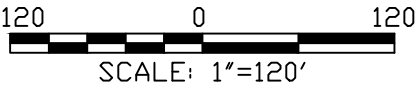
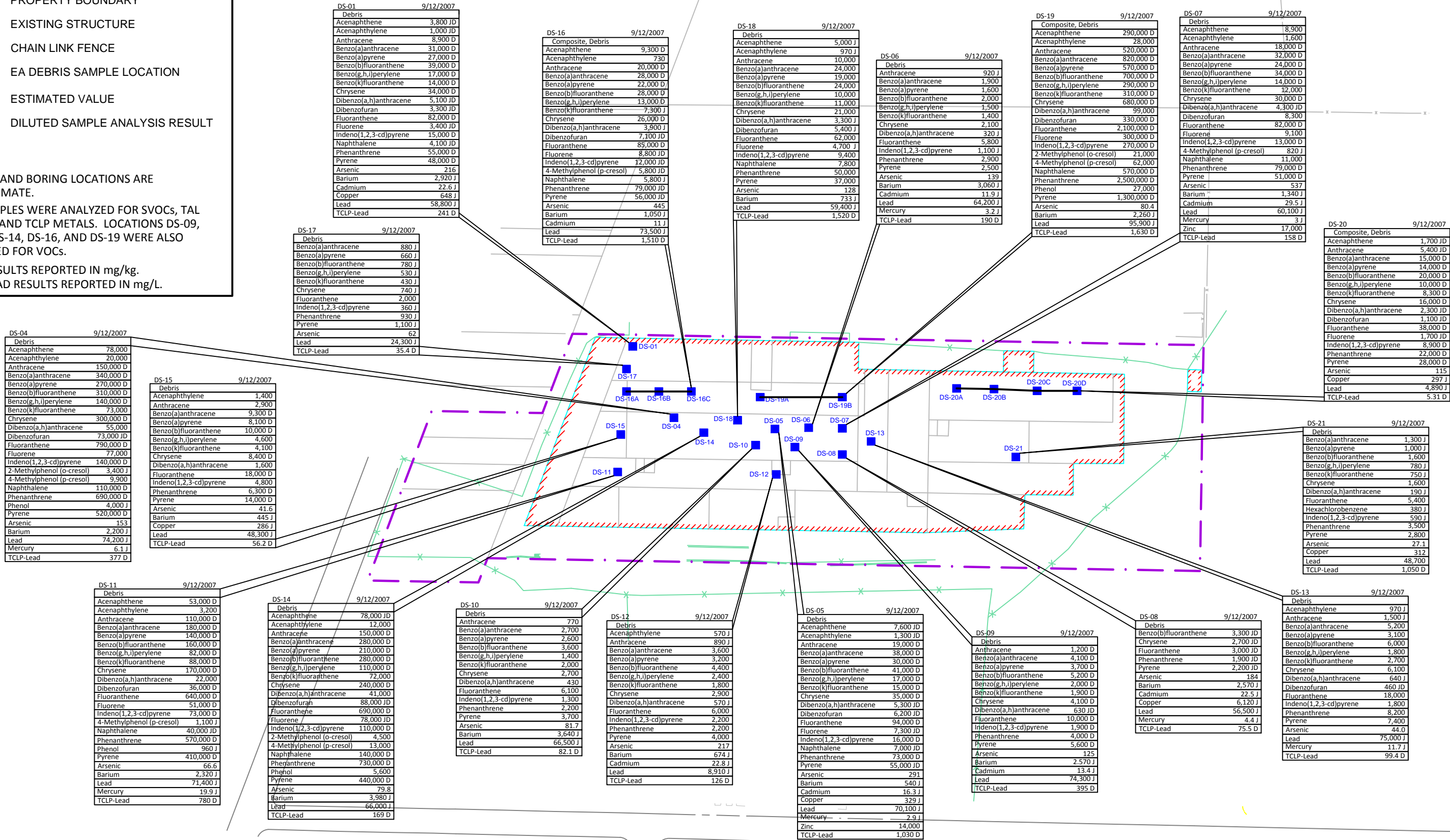
**NOTES:**

SAMPLE AND BORING LOCATIONS ARE APPROXIMATE.

ALL SAMPLES WERE ANALYZED FOR SVOCs, TAL METALS AND TCLP METALS. LOCATIONS DS-09, DS-13, DS-14, DS-16, AND DS-19 WERE ALSO ANALYZED FOR VOCs.

LEAD RESULTS REPORTED IN mg/kg.  
TCLP-LEAD RESULTS REPORTED IN mg/L.

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EA DEBRIS SAMPLE RESULTS  
DETECTED ABOVE COMMERCIAL  
SCOs AND TCLP STANDARDS

Figure: 7



LEGEND

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PROPERTY BOUNDARY

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EXISTING STRUCTURE

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CHAIN LINK FENCE

●

EA SOIL BORING LOCATION

J

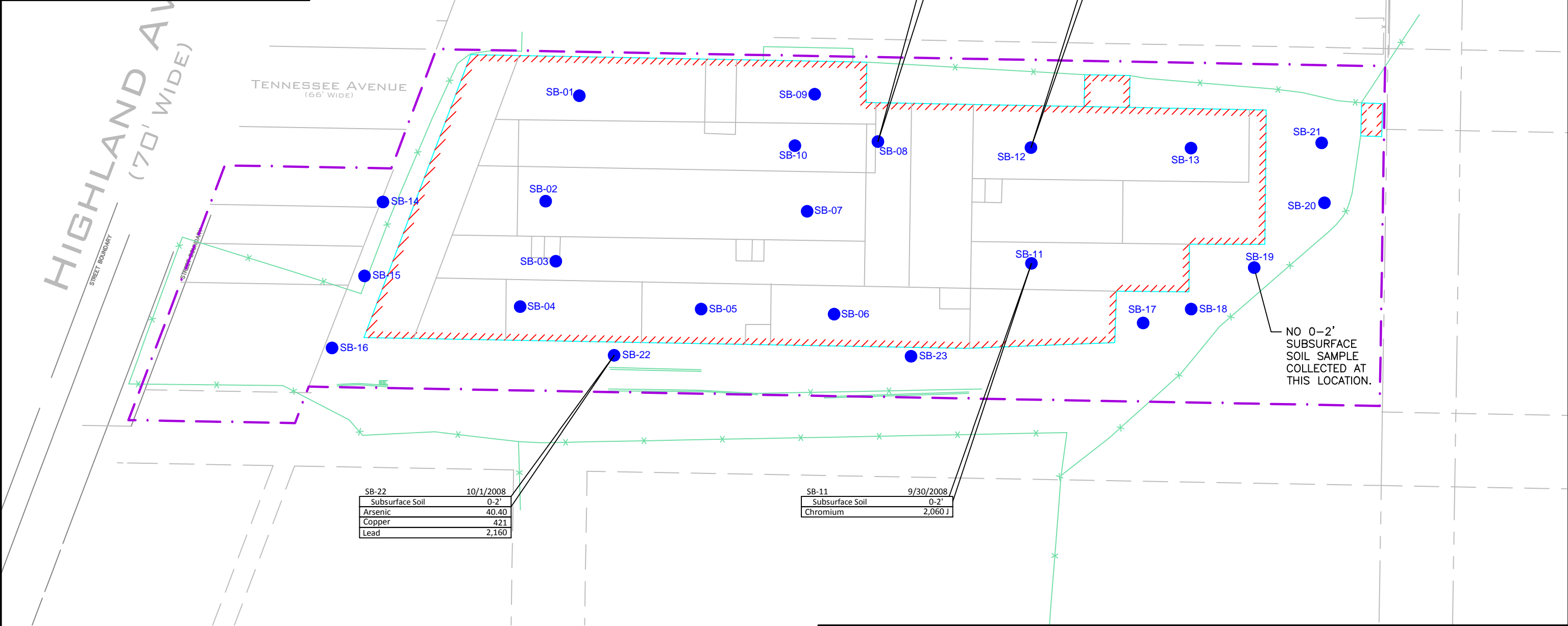
ESTIMATED VALUE

NOTES:

BORING LOCATIONS ARE APPROXIMATE.

RESULTS REPORTED IN mg/kg.

ALL SOIL BORING LOCATIONS WERE SAMPLED FROM 0-2' FOR TARGET ANALYTE LIST (TAL) METALS EXCEPT FOR SB-19.



LEGEND

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PROPERTY BOUNDARY

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EXISTING STRUCTURE

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CHAIN LINK FENCE

B-18

AMEC SOIL BORING LOCATION

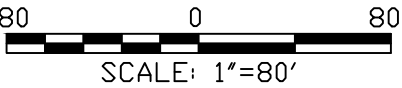
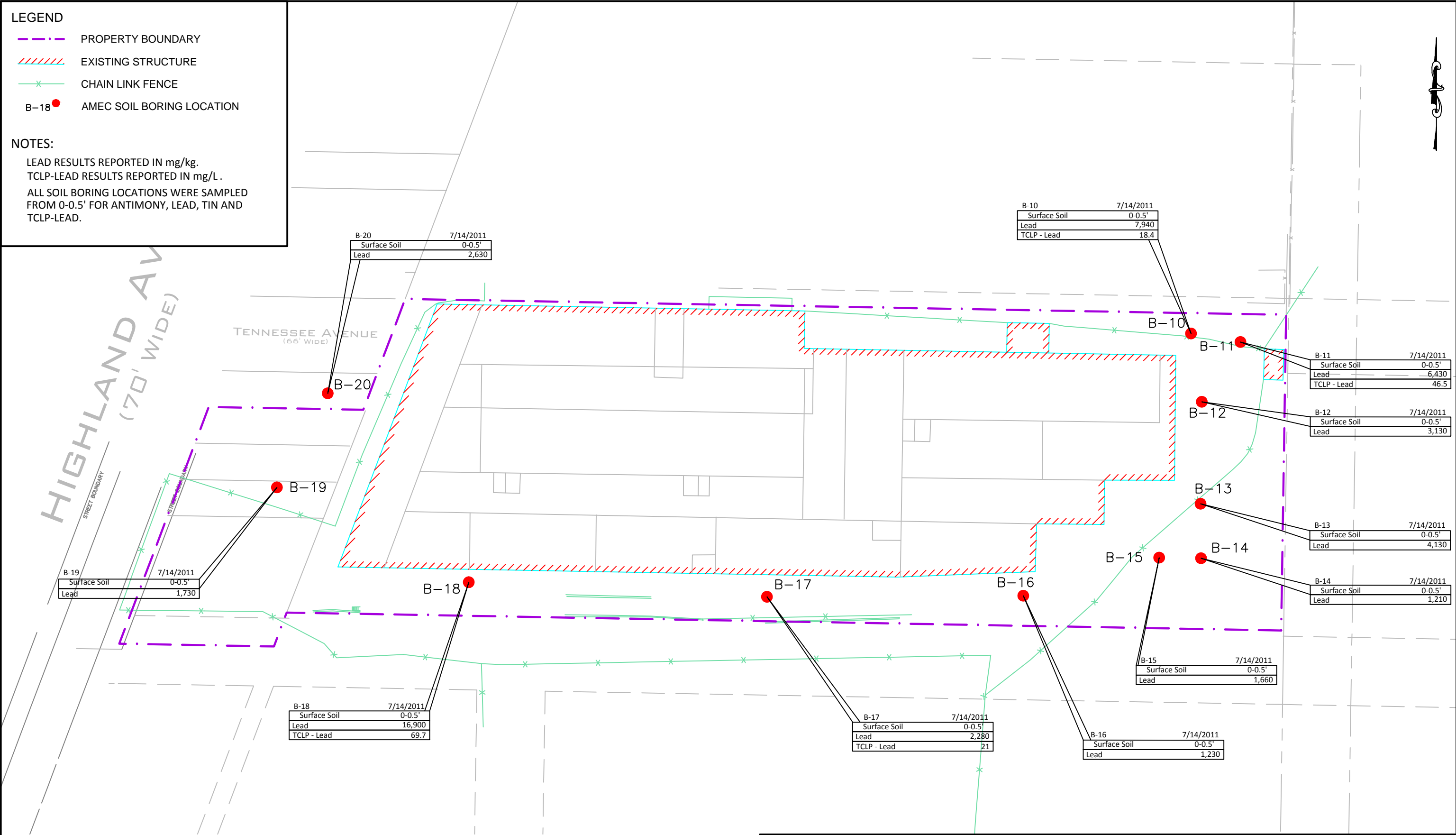
NOTES:

LEAD RESULTS REPORTED IN mg/kg.

TCLP-LEAD RESULTS REPORTED IN mg/L.

ALL SOIL BORING LOCATIONS WERE SAMPLED FROM 0-0.5' FOR ANTIMONY, LEAD, TIN AND TCLP-LEAD.

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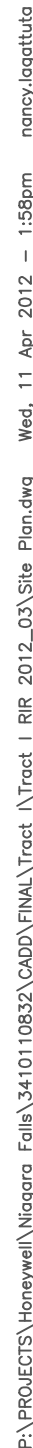
AMEC SURFACE SOIL SAMPLE RESULTS DETECTED ABOVE COMMERCIAL SCOs AND TCLP STANDARDS

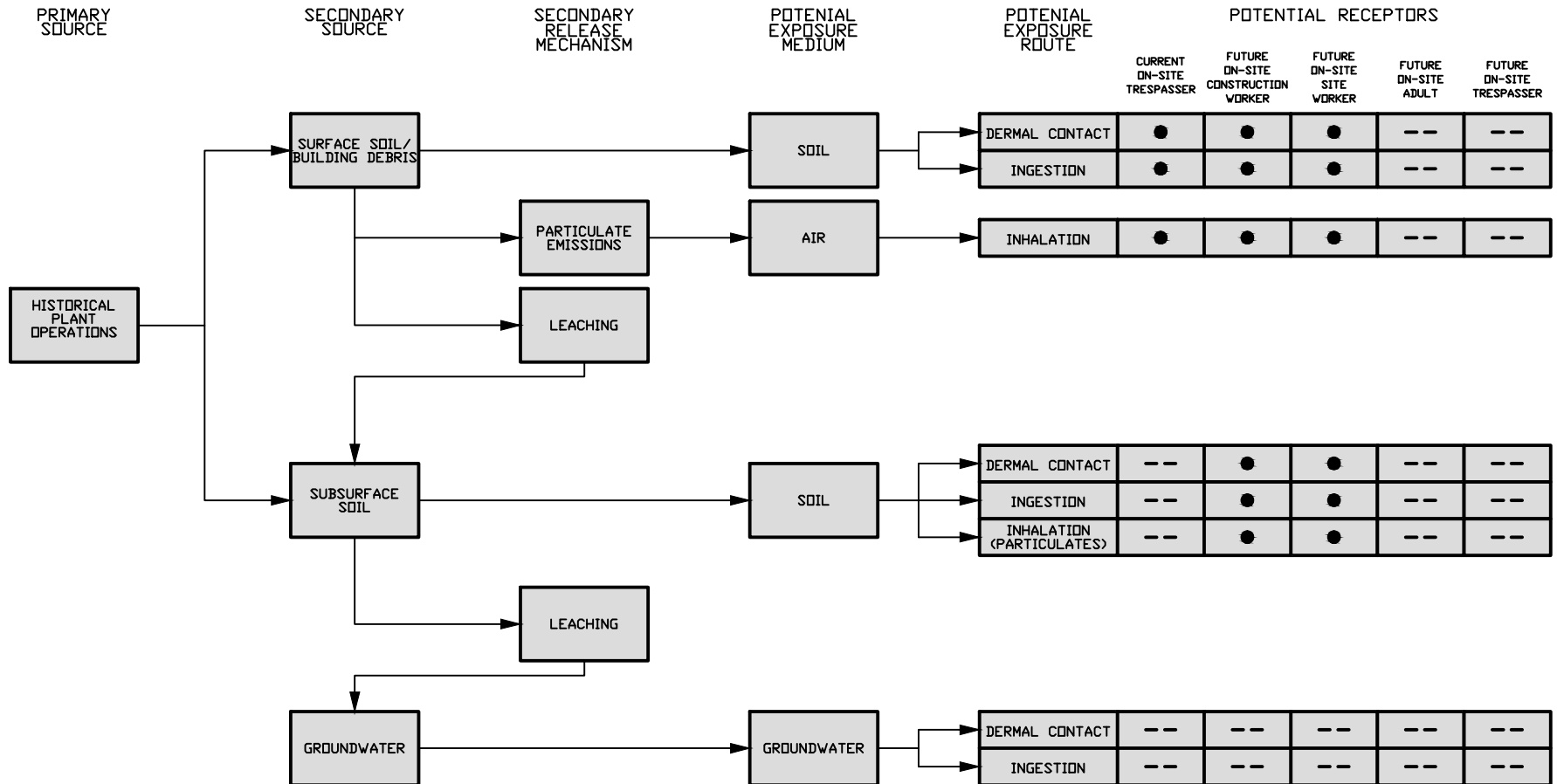
Figure: 9

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- INDICATES POTENTIALLY COMPLETE EXPOSURE PATHWAY
- INDICATES INCOMPLETE EXPOSURE PATHWAY BASED ON CURRENT SITE USE AND THE ANTICIPATED FUTURE COMMERCIAL USE SCENARIO

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CONCEPTUAL SITE MODEL

Figure: 12