

Niagara Transformer Corporation
ERIE, NEW YORK

Periodic Review Report

NYSDEC Site Number: C915234

Prepared for:

Niagara Transformer Corporation
1747 Dale Road
Cheektowaga, New York 14225

Prepared by:

Golder Associates Inc.
2430 North Forest Road, Suite 100
Getzville, New York 14068
(716) 204-5880

JUNE 2017

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1.0 SITE OVERVIEW

1.1 Site Location & Description

The site is located at 1755 Dale Road in the Town of Cheektowaga, County of Erie, New York and is identified as Block 3 and Lot 6.1 on the Town of Cheektowaga Tax Map. The site is an approximately 3-acre area bounded by Dale Road to the north, CSX rail corridor to the south, a vacant parcel (owned by NTC) to the east, and NTC's manufacturing facility located at 1747 Dale Road to the west (see Figure 1-1). The site was remediated in accordance with Brownfield Cleanup Agreement (BCA) Index# C915234-10-09, Site C915234, which was executed on November 19, 2009.

1.2 Nature and Extent of Contamination Prior to Remediation

Prior to site remediation under the Brownfields Cleanup Program (BCP), PCB contamination ranged from non-detectable to concentrations of 1060 ppm in the shallow soil/fill. The BCP RI sampling program included analysis for a broad range of potential contaminants (VOCs, SVOCs, metals and pesticides) and focused on potential PCB impacts at depths greater than 1 foot and in shallow surface soils at the northernmost end of the Site that were not addressed during an earlier (December 2007) investigation. The BCP RI detected PCBs in the soil/fill borings at concentrations up to 22 parts per million (ppm).

1.3 Site Remedial Program

An IRM was implemented under the Brownfield Cleanup Agreement at the Niagara Transformer 1755 Dale Road Site in February 2010. Details of the IRM approach are described in the August 2009 RI/IRM Work Plan (Ref. 1). Based on the nature and extent of contamination as indicated by prior investigations (primarily based on the PCB impacts identified as a result of the 2007 NTC Soil Investigation) and the planned redevelopment of the subject property, the IRM Work Plan called for source removal via excavation, with off-site disposal of impacted soil.

Impacted soil that exceeded the NYSDEC Part 375 restricted industrial SCOs for total poly-chlorinated biphenyls (PCBs) was identified in thirteen (13) excavation grids that were approximately 50 ft. by 50 ft. in area. These soils were further characterized as hazardous (i.e., greater than 50 ppm for total PCBs) or non-hazardous (i.e., less than 50 ppm for total PBCs) in each of the grids.

The following is a summary of the Remedial Actions performed at the site:

- ♥ Excavation and on-site staging of non-hazardous soil grids. Approximately 1,097 tons of non-hazardous soil was temporarily relocated to an onsite spoils lay down area for further testing and characterization prior to disposal off site. Grids identified as numbers 3, 4, 5 and 7 were characterized as non-hazardous based on the 2007 surface soil investigation performed by NTC. Grid 3, 4 and 7 sample results from the 2007 investigation indicated that the surficial soils were technically below the Part 375 Restricted Industrial SCO. However, it was determined that based on their location between other grids that exceeded the SCO that it was impractical to leave the soil/fill from these grids in place. Therefore they were included in the non-hazardous excavation plan.

- ♥ Excavation of PCBs hazardous (i.e. > 50 ppm) soil/fill. Approximately 2,075 tons of soil/fill was removed as hazardous waste for off-site disposal. Grids identified as numbers 1, 2, 6, 8, 9, 10, 11, 12 and 13 were characterized as hazardous based on the 2007 surface soil investigation performed by NTC.
- ♥ Characterization and off-site disposal of approximately 6 partially crushed and deteriorated drums containing non-hazardous roofing tar residuals;
- ♥ Excavation and on-site relocation of large pieces of concrete rubble from several designated grid areas;
- ♥ Verification sampling of the sidewalls and floor areas of the excavated. Golder personnel collected 11 sidewall, 20 floor and 4 sidewall verification samples within the excavation limits and from stockpiled soil from the non-hazardous grids;
- ♥ Off-site transportation and disposal of hazardous and non-hazardous soil/fill to the CWM Chemical Services TSD Facility, Model City, New York;
- ♥ Community dust monitoring program implemented during excavation activities;
- ♥ Development and implementation of a Site Management Plan for long term management of remaining contamination as required by the Environmental Easement, which includes plans for: (1) Institutional Controls, (2) monitoring, (3) operation and maintenance and (4) reporting;
- ♥ Execution and recording of an Environmental Easement to restrict land use and prevent future exposure to any contamination remaining at the site.

The Site was remediated to meet the restricted industrial SCO for PCBs of 25 ppm. The materials that were removed were primarily non-native fill and small quantities of native soils, and natural vegetation in the contaminated areas. The total amount of material that was disposed of off-site was 3,172 tons.

No long-term treatment systems were required or installed as part of the site remedy based on the results of the RI and subsequent soil/fill removals performed under the IRM.

After completion of the remedial work, some contamination was left in the subsurface at this site, which is hereafter referred to as “remaining contamination.” The contamination remaining on the site consists of low levels of PCBs within the upper soil/fill layer that remains after completion of the remedial excavation across the majority of the site. In general, based on extensive geotechnical and environmental borings, this layer of soil/fill decreases in thickness at the north and west portions of the Site and increases to a thickness of 3 to 4 feet in the southern and western portions of the Site. The remaining concentrations of PCBs in the shallow soil/fill that exceed the Track 1 (unrestricted) SCO for PCBs (0.1 ppm) are summarized in Table 1 of the Site Management Plan (SMP) [Ref. 2]. The residual concentrations range from 0.15 to 11.2 ppm with an average concentration across the 49 samples of 1.9 ppm. This data consists of samples collected during the December 2007 Investigation from areas of the Site that were not remediated as part of the IRM as well as supplemental BCP RI data and post-IRM remediation verification sample results collected from the IRM excavation areas.

A SMP was prepared to manage remaining contamination at the site until the Environmental Easement is extinguished in accordance with ECL Article 71, Title 36. The SMP addresses the means for implementing the Institutional Controls (ICs) that are required by the Environmental Easement for the site.

1.4 Purpose of Periodic Review Report

This Periodic Review Report (PRR) presents information on the maintenance, monitoring and compliance activities performed at the Niagara Transformer Site No. C915234 covering the period from June 16, 2016 to June 15, 2017.

During the reporting period of this PRR, no intrusive activities were performed on the BCP Site.

2.0 REMEDIAL SYSTEMS COMPLIANCE

There is no active remedial treatment or engineering control systems operating at the 1755 Dale Road BCP Site because the Interim Remedial Measure (IRM) conducted as part of the overall BCP achieved the Remedial Action Objectives for the Site of:

- ♥ Removal of PCB -impacted soil/fill within the Site to levels protective of human health for the intended future use of the Site (Industrial Soil Cleanup Objectives [SCOs])
- ♥ Mitigate and minimize loadings to storm water from residual PCB-impacted soil/fill.

6NYCRR Part 375 Restricted Industrial SCOs were employed as soil cleanup goals to provide a measure of performance against these RAOs. The SCOs are soil concentration limits protective of human health and groundwater quality. Achievement of the SCOs was confirmed through verification sampling.

The approved SMP requires the implementation of a long term monitoring plan that incorporates semi-annual storm water and sediment analysis and annual inspections of the site to identify evidence of excessive soil erosion to the Site soils or deterioration of asphalt or concrete structures on the Site that might indicate that off-site transport of soil/fill is more likely to occur or is occurring. In particular, the annual inspections are to focus on the condition and integrity of the soil berms created as part of the BCP approved remedial program.

The results of the required monitoring activities and annual inspection are presented in Section 4 "Monitoring Plan Compliance Report".

3.0 INSTITUTIONAL CONTROL COMPLIANCE

3.1 Introduction

3.1.1 General

Since remaining contaminated soil exists beneath the site, Institutional Controls (ICs) are required to protect human health and the environment. The Institutional Control Plan is a component of the SMP and describes the procedures for the implementation and management of all ICs at the site. The goals of the ICs are to: (1) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination; and, (2) limit the use and development of the site to industrial uses only.

3.2 Description of Institutional Controls

The Institutional Controls are:

- ♥ Compliance with the Environmental Easement and the SMP by the Grantor and the Grantor's successors and assigns;
- ♥ Performance of annual storm water and sediment (when present) monitoring for PCBs as defined in the SMP;
- ♥ Implementation and documentation of the soil/fill management procedures provided in the Excavation Work Plan (EWP); and
- ♥ Reporting of the data and information pertinent to Site Management of the Controlled Property.

The site has a series of Institutional Controls in the form of site restrictions. Site restrictions that apply to the Controlled Property are:

- ♥ The property may only be used for restricted industrial use provided that the long-term Institutional Controls included in this SMP are employed.
- ♥ The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use.
- ♥ The property may not be used for a higher level of use, such as restricted commercial use without additional remediation and amendment of the Environmental Easement, as approved by the NYSDEC;
- ♥ All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with the SMP and EWP;
- ♥ Vegetable gardens and farming on the property are prohibited;
- ♥ The site owner or remedial party will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow and will be made by an expert that the NYSDEC finds acceptable.

The environmental easement summarizing the site use restrictions and requirements for the site was executed by the Department on June 22, 2010, and filed with the Erie County Clerk on July 15, 2010. The Easement A copy of the easement and proof of filing is provided in Appendix F of the SMP for this site.

3.2.1 Status of ICs

During the reporting period covered by this PRR, all ICs were in place and effective in meeting their objectives. No intrusive site work was performed on the BCP Site during the reporting period covered by this PRR. Any future intrusive work to be performed on the BCP Site will be conducted in accordance with the Department approved Excavation Work Plan.

There are no corrective measures required to insure the effectiveness of ICs at this time based on the results of the monitoring and annual inspection performed.

During the reporting period covered by this PRR storm water and sediment samples were collected on May 2, 2017 the storm water retention pond water level reached the overflow structure and storm water effluent was present in sufficient quantity for sampling at the outfall structure during the current PRR reporting period, i.e., June 16, 2016 through June 15, 2017. The next sampling event will be tentatively scheduled for mid to late April to mid May 2018.

4.0 MONITORING PLAN COMPLIANCE REPORT

4.1 3.1 Introduction

4.1.1 General

The Monitoring Plan describes the measures for evaluating the performance and effectiveness of the remedy to reduce or mitigate residual contamination at the site, and all affected site media identified below. This Monitoring Plan may only be revised with the approval of NYSDEC.

4.1.2 Schedule

Semi-annual monitoring of the Site storm water and associated sediment was initially conducted to assess the effectiveness of the remedy and overall reduction in contamination on-site. Semi-annual monitoring was performed for the first 4 years. A reduction in monitoring frequency was requested in October 2015 from the Department since the eight sampling events conducted over the first four years of monitoring demonstrated that PCBs are not being detected in the storm water from the Site and low level concentrations of PCBs in the off-site sediment (collected in the drainage swale adjacent to the railroad tracks) remain stable and indicative of PCB contributions/sources from upstream of the BCP Site. Trends in PCB contaminant levels in storm water and sediment discharged from the Site will be evaluated to determine if the remedy continues to be effective in achieving remedial goals. The Monitoring program is summarized in Table 4-1 and results of the monitoring performed are discussed further in Section 4.2 below.

Table 4-1: Monitoring/Inspection Schedule

Monitoring Program	Frequency*	Matrix	Analysis
Storm water: Upstream, Outfall, Downstream	Annually	Storm water runoff and sediment (when present)	PCBs, Method 8082
Annual Site Inspection	Annually	Visually inspect entire site (with particular focus on soil berms) for signs of deterioration/erosion	NA

* The frequency of events will be conducted as specified until otherwise approved by NYSDEC and NYSDOH

4.2 Monitoring Program Results

4.2.1 Surface Water and Sediment Monitoring

As previously noted the pond discharge was sampled when the water level of the pond reaches the overflow structure in sufficient volume to allow for sampling. Golder collected storm water samples on May 2, 2017. Samples were collected at three (3) locations in accordance with the NTC C915234 Site SMP. Samples

were collected from the storm water retention pond outfall structure on the East parcel (outfall sample), in the drainage swale 50 feet east and upstream of the combined 1747/1755 storm water outfall (upstream sample) and in the drainage swale approximately 10 feet downstream of the combined outfall (downstream sample). Refer to Figure 4-1 for the location where these samples were collected.

The storm water samples were analyzed for PCBs. The analytical results from May 2, 2017 sampling event are summarized and compared to NYSDEC surface water standards (NYSDEC 1998) in Table 4-2. No detections above NYSDEC surface water standards were found in the Pond Discharge, Upstream, and Downstream storm water samples. The downstream sample includes contributions from the 1747 Dale Road site storm water discharge outfall to the drainage swale where the sample was collected.

In conjunction with the storm water sampling, 2 of the 3 sediment samples identified in the SMP Monitoring Plan were collected. The upstream and downstream sediment sample locations were sampled; however, there was not sufficient sediment present in the East Parcel pond outfall structure to allow for collection of this sample.

During the May sampling events, Aroclor 1260 was detected in the upstream sediment samples at concentrations of 7.0 mg/kg. In the downstream sediment samples, Aroclor 1254 was detected at a concentration of 1.4 mg/kg. The analytical results from the May 2017 sediment sampling event are also summarized and presented in Table 4-2.

A copy of the laboratory Analytical Reports for all storm water and sediment analyses performed is attached in Appendix B.

4.3 Annual Site Inspection Results

An annual inspection was performed on May 2, 2017 in accordance with the SMP Monitoring Program requirements. A Site-wide inspection form was completed (Appendix C). The form compiles sufficient information to assess the following:

- ♥ Compliance with all ICs, including site usage;
- ♥ General site conditions at the time of the inspection;
- ♥ The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection;
- ♥ Compliance with permits and schedules included in the Operation and Maintenance Plan; and
- ♥ Confirm that site records are up to date.

All areas of the Site were carefully inspected to assess the condition of surface soil integrity, asphalt and concrete areas to determine if evidence of erosion or related deterioration of the site soils, asphalt or concrete structures is occurring that would result in the erosion of Site soil/fill onto surrounding properties. In particular, special attention was given to inspecting the condition and integrity of the soil berms created

in 2010 as part of the initial Site redevelopment plan. These berms were covered with clean topsoil in the spring of 2011 and seeded and planted with trees and grass as part of the approved landscaping plan with the Town. No erosion or deterioration of the soil berms in any areas was noted, therefore no corrective actions were needed to address or otherwise correct the problem(s) identified during the inspection. A photo log of photos taken during the inspection is also provided in Appendix C.

4.4 Summary of Off-Site Activities During Reporting Period

No intrusive activities were performed at the Site during the period covered by this PRR. Previous intrusive construction activities conducted on the Site were performed in accordance with the department-approved SMP.

4.5 Conclusions and Recommendations

At the time of the annual inspection, the Site was fully compliant with the institutional controls described in the SMP. All monitoring results and inspection results were acceptable with no detection of PCBs in either the Site outfall discharge or downstream storm water samples and no deterioration or evidence of erosion from the soil berms and the Site. The low level positive detections of PCBs in the sediment samples were consistent with detections reported for the samples collected in nearly the same locations as part of the SMP monitoring associated with the adjacent 1747 Dale Road Site (where contributions of storm water and sediment from the 1747 parcel are present).

Annual storm water and sediment sampling will continue to be scheduled for future monitoring events in the April/May timeframe to be representative of spring runoff when the retention pond levels are typically more elevated and the frequency of pond discharge is greater than in the fall.

5.0 OVERALL CONCLUSIONS AND RECOMMENDATIONS

Based on the initial monitoring and inspection results described in Section 4 and conducted during the timeframe covered by this PRR, compliance with all relevant components of the SMP ICs was achieved. A copy of the completed and certified “Site Management Periodic Review Report Notice Institutional and Engineering Controls Certification Form” is attached in Appendix D.

As noted in Section 4.0, the storm water and sediment sampling completed to date (i.e., nine events) cannot conclusively assess the performance of the remedy. However, the storm water sample results over the first six years and the overall condition of the site and integrity of the final vegetated soil berms provide solid evidence that the remedy performed under the BCP is achieving its intended goals of minimizing, to the extent feasible, exposure of remaining contamination to the environment through storm water runoff and associated sediment erosion.

The next Annual Inspection will be performed in April or May of 2018. The next SMP sampling event will be performed in 2018 concurrent with the planned Annual site inspection, contingent on storm water availability for sampling.

6.0 REFERENCES

1. Golder Associates Inc., *Remedial Investigation & Interim Remedial Measures Work Plan, Niagara Transformer Corporation – 1755 Dale Road Cheektowaga, New York*, prepared for New York State Department of Environmental Conservation, September 2009.
2. Golder Associates Inc., *Site Management Plan, Niagara Transformer Corporation, NYSDEC Site No. 915234*, prepared for Niagara Transformer Corporation, September 2010.

TABLE 4-2

(TABLE 4-1 IN TEXT)

TABLE 4-2
SUMMARY OF ANALYTICAL RESULTS FOR STORMWATER AND SEDIMENT SAMPLING

PERIODIC REVIEW REPORT

1755 DALE RD. BCP SITE # C915234 - NIAGARA TRANSFORMER CORP
CHEEKTOWAGA, NY

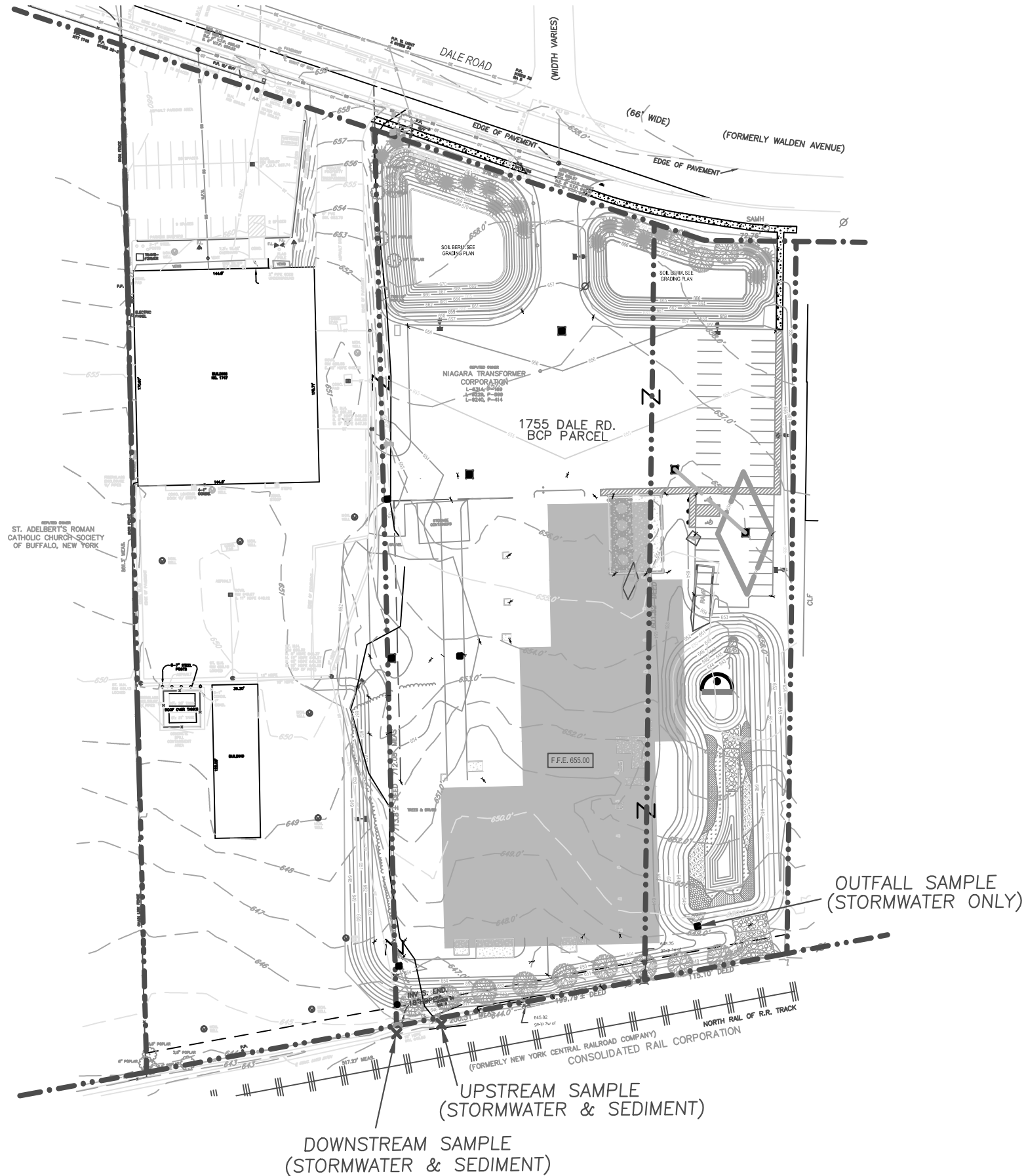
Lab ID		480-72646-1	480-72646-2	480-72646-3	480-72646-4	480-72646-5	480-117295-1	480-117295-2	480-117295-4	480-117295-3	480-117295-5
Sample ID		Pond Discharge	Upstream Surface Water	Downstream Surface Water	Upstream Sediment	Downstream Sediment	Pond Discharge	Upstream Surface Water	Downstream Surface Water	Upstream Sediment	Downstream Sediment
Sample Date		12/8/14					5/2/17				
Sample Matrix		Water	Water	Water	Sediment	Sediment	Water	Water	Water	Sediment	Sediment
Units		ug/L	ug/L	ug/L	ug/Kg	ug/Kg	ug/L	ug/L	ug/L	ug/Kg	ug/Kg
Polychlorinated Biphenyls (8082)	NYSDEC Surface Water Standards (ug/L)										
Aroclor 1016		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1221		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1232		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1242		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1248		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1254		ND	ND	ND	ND	ND	ND	ND	ND	ND	1400
Aroclor 1260		ND	ND	ND	3900	3300	ND	ND	ND	7000	ND
TOTAL PCBs	0.09	0	0	0	3900	3300	0	0	0	7000	1400

Footnotes:

All values are in Parts per Billion (PPB).
ND = Not detected at the RL.

Table by: AJF
Checked by: PTM

FIGURES

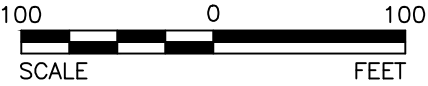


LEGEND

- X STORMWATER/SEDIMENT SAMPLE LOCATION (DRAINAGE DITCH)
- STORMWATER OUTFALL STRUCTURE

REFERENCES

1.) BASE MAP FROM C&S DRAWING: NT-C103.DWG



PROJECT

NIAGARA TRANSFORMER CORP.
PERIODIC REVIEW REPORT
CHEEKTOWAGA, NEW YORK

TITLE

DECEMBER 2014 / MAY 2015
SURFACE WATER & SEDIMENT
SAMPLE LOCATIONS

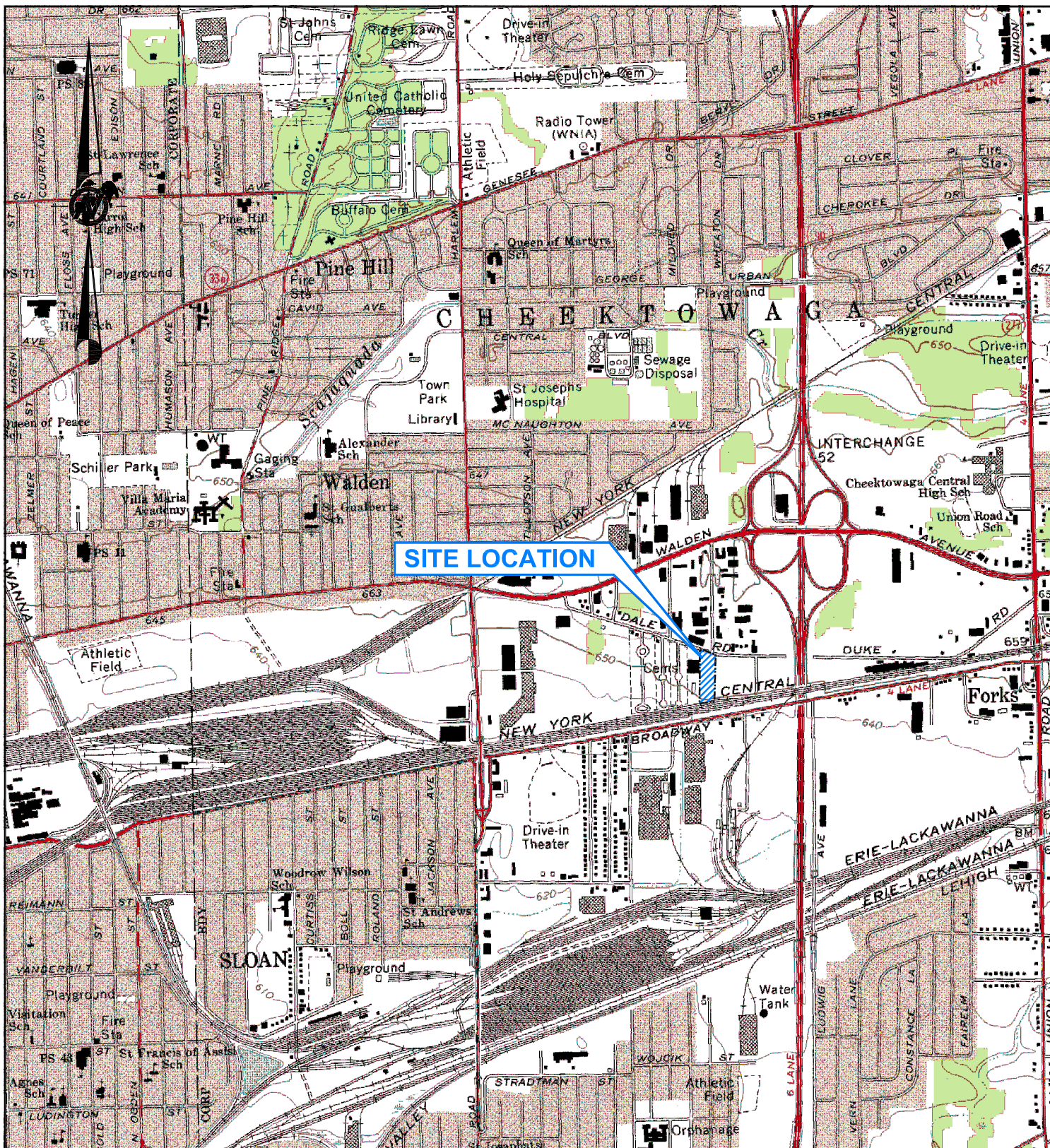
PROJECT N093-89144-02

FILE No.0938914402A031

REV. 0	SCALE AS SHOWN
DESIGN PTM	10/5/2012
CADD JGT	5/14/15
CHECK	
REVIEW	

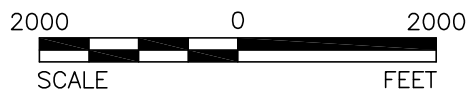
FIG 4-1

Golder Associates
Mt. Laurel, New Jersey



REFERENCE

1.) BASE FROM 7.5 MINUTE QUADRANGLE OF BUFFALO NORTHEAST, NEW YORK DATED 1965.



SCALE	AS SHOWN
DATE	07/06/09
DESIGN	PTM
CADD	GLS

TITLE

SITE VICINITY MAP 1755 DALE ROAD BCP PARCEL CHEEKTOWAGA, NEW YORK

FILE No. 0938914402A001

CHECK

PROJECT No. 093-89144-02 REV. 0

REVIEW

NIAGARA TRANSFORMER CORP.

FIGURE

1-1

APPENDIX A
TEST AMERICA ANALYTICAL REPORT – SAMPLE DATE:
MAY 2, 2017

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

ANALYTICAL REPORT

TestAmerica Laboratories, Inc.

TestAmerica Buffalo

10 Hazelwood Drive

Amherst, NY 14228-2298

Tel: (716)691-2600

TestAmerica Job ID: 480-117295-1

Client Project/Site: Golder - Niagara Transformer site

For:

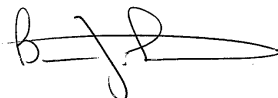
Golder Associates Inc.

2430 North Forest Rd

Suite 100

Getzville, New York 14068

Attn: Mr. Patrick Martin



Authorized for release by:

5/8/2017 1:18:22 PM

Brian Fischer, Manager of Project Management

(716)504-9835

brian.fischer@testamericainc.com

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The test results in this report meet all 2003 NELAC and 2009 TNI requirements for accredited parameters, exceptions are noted in this report. This report may not be reproduced except in full, and with written approval from the laboratory. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.

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Definitions/Glossary

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Qualifiers

GC Semi VOA

Qualifier	Qualifier Description
X	Surrogate is outside control limits

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
α	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CNF	Contains no Free Liquid
DER	Duplicate error ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision level concentration
MDA	Minimum detectable activity
EDL	Estimated Detection Limit
MDC	Minimum detectable concentration
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
NC	Not Calculated
ND	Not detected at the reporting limit (or MDL or EDL if shown)
PQL	Practical Quantitation Limit
QC	Quality Control
RER	Relative error ratio
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)

Case Narrative

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Job ID: 480-117295-1

Laboratory: TestAmerica Buffalo

Narrative

Job Narrative 480-117295-1

Comments

No additional comments.

Receipt

The samples were received on 5/2/2017 11:00 AM; the samples arrived in good condition, properly preserved and, where required, on ice. The temperature of the cooler at receipt was 4.8° C.

GC Semi VOA

Method(s) 8082A: DCB Decachlorobiphenyl surrogate recovery for the following samples was outside control limits: DOWNSTREAM SEDIMENT (480-117295-5). Evidence of matrix interference is present; therefore, re-extraction and/or re-analysis was not performed.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/Glossary page.

Organic Prep

Method(s) 3550C: The following sample: UPSTREAM SEDIMENT (480-117295-3) and DOWNSTREAM SEDIMENT (480-117295-5) was decanted prior to preparation.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/Glossary page.

Detection Summary

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Client Sample ID: 1755 POND DISCHARGE

Lab Sample ID: 480-117295-1

No Detections.

Client Sample ID: UPSTREAM SURFACE WATER

Lab Sample ID: 480-117295-2

No Detections.

Client Sample ID: UPSTREAM SEDIMENT

Lab Sample ID: 480-117295-3

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
PCB-1260	7000		260	120	ug/Kg	1	☼	8082A	Total/NA

Client Sample ID: DOWNSTREAM SURFACE WATER

Lab Sample ID: 480-117295-4

No Detections.

Client Sample ID: DOWNSTREAM SEDIMENT

Lab Sample ID: 480-117295-5

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
PCB-1254	1400		190	88	ug/Kg	1	☼	8082A	Total/NA

This Detection Summary does not include radiochemical test results.

TestAmerica Buffalo

Client Sample Results

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Client Sample ID: 1755 POND DISCHARGE

Lab Sample ID: 480-117295-1

Date Collected: 05/02/17 09:30

Matrix: Water

Date Received: 05/02/17 11:00

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 14:37	1
PCB-1221	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 14:37	1
PCB-1232	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 14:37	1
PCB-1242	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 14:37	1
PCB-1248	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 14:37	1
PCB-1254	ND		0.50	0.25	ug/L		05/04/17 14:24	05/05/17 14:37	1
PCB-1260	ND		0.50	0.25	ug/L		05/04/17 14:24	05/05/17 14:37	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
DCB Decachlorobiphenyl	68		19 - 120	05/04/17 14:24	05/05/17 14:37	1
Tetrachloro-m-xylene	99		39 - 121	05/04/17 14:24	05/05/17 14:37	1

Client Sample Results

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Client Sample ID: UPSTREAM SURFACE WATER

Lab Sample ID: 480-117295-2

Date Collected: 05/02/17 09:51

Matrix: Water

Date Received: 05/02/17 11:00

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 14:53	1
PCB-1221	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 14:53	1
PCB-1232	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 14:53	1
PCB-1242	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 14:53	1
PCB-1248	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 14:53	1
PCB-1254	ND		0.50	0.25	ug/L		05/04/17 14:24	05/05/17 14:53	1
PCB-1260	ND		0.50	0.25	ug/L		05/04/17 14:24	05/05/17 14:53	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
DCB Decachlorobiphenyl	69		19 - 120	05/04/17 14:24	05/05/17 14:53	1
Tetrachloro-m-xylene	94		39 - 121	05/04/17 14:24	05/05/17 14:53	1

Client Sample Results

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Client Sample ID: UPSTREAM SEDIMENT

Lab Sample ID: 480-117295-3

Date Collected: 05/02/17 09:50

Matrix: Solid

Date Received: 05/02/17 11:00

Percent Solids: 87.6

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND		260	51	ug/Kg	☼	05/03/17 13:42	05/04/17 06:49	1
PCB-1221	ND		260	51	ug/Kg	☼	05/03/17 13:42	05/04/17 06:49	1
PCB-1232	ND		260	51	ug/Kg	☼	05/03/17 13:42	05/04/17 06:49	1
PCB-1242	ND		260	51	ug/Kg	☼	05/03/17 13:42	05/04/17 06:49	1
PCB-1248	ND		260	51	ug/Kg	☼	05/03/17 13:42	05/04/17 06:49	1
PCB-1254	ND		260	120	ug/Kg	☼	05/03/17 13:42	05/04/17 06:49	1
PCB-1260	7000		260	120	ug/Kg	☼	05/03/17 13:42	05/04/17 06:49	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
DCB Decachlorobiphenyl	132		65 - 174	05/03/17 13:42	05/04/17 06:49	1
Tetrachloro-m-xylene	126		60 - 154	05/03/17 13:42	05/04/17 06:49	1

TestAmerica Buffalo

Client Sample Results

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Client Sample ID: DOWNSTREAM SURFACE WATER

Lab Sample ID: 480-117295-4

Date Collected: 05/02/17 10:00

Matrix: Water

Date Received: 05/02/17 11:00

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 15:09	1
PCB-1221	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 15:09	1
PCB-1232	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 15:09	1
PCB-1242	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 15:09	1
PCB-1248	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 15:09	1
PCB-1254	ND		0.50	0.25	ug/L		05/04/17 14:24	05/05/17 15:09	1
PCB-1260	ND		0.50	0.25	ug/L		05/04/17 14:24	05/05/17 15:09	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
DCB Decachlorobiphenyl	56		19 - 120	05/04/17 14:24	05/05/17 15:09	1
Tetrachloro-m-xylene	83		39 - 121	05/04/17 14:24	05/05/17 15:09	1

Client Sample Results

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Client Sample ID: DOWNSTREAM SEDIMENT

Lab Sample ID: 480-117295-5

Date Collected: 05/02/17 10:02

Matrix: Solid

Date Received: 05/02/17 11:00

Percent Solids: 92.5

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND		190	37	ug/Kg	☼	05/03/17 13:42	05/04/17 07:05	1
PCB-1221	ND		190	37	ug/Kg	☼	05/03/17 13:42	05/04/17 07:05	1
PCB-1232	ND		190	37	ug/Kg	☼	05/03/17 13:42	05/04/17 07:05	1
PCB-1242	ND		190	37	ug/Kg	☼	05/03/17 13:42	05/04/17 07:05	1
PCB-1248	ND		190	37	ug/Kg	☼	05/03/17 13:42	05/04/17 07:05	1
PCB-1254	1400		190	88	ug/Kg	☼	05/03/17 13:42	05/04/17 07:05	1
PCB-1260	ND		190	88	ug/Kg	☼	05/03/17 13:42	05/04/17 07:05	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
DCB Decachlorobiphenyl	64	X	65 - 174	05/03/17 13:42	05/04/17 07:05	1
Tetrachloro-m-xylene	88		60 - 154	05/03/17 13:42	05/04/17 07:05	1

Surrogate Summary

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Matrix: Solid

Prep Type: Total/NA

		Percent Surrogate Recovery (Acceptance Limits)	
Lab Sample ID	Client Sample ID	DCB1 (65-174)	TCX1 (60-154)
480-117295-3	UPSTREAM SEDIMENT	132	126
480-117295-5	DOWNSTREAM SEDIMENT	64 X	88
LCS 480-355462/2-A	Lab Control Sample	135	129
MB 480-355462/1-A	Method Blank	122	108
Surrogate Legend			
DCB = DCB Decachlorobiphenyl			
TCX = Tetrachloro-m-xylene			

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Matrix: Water

Prep Type: Total/NA

		Percent Surrogate Recovery (Acceptance Limits)	
Lab Sample ID	Client Sample ID	DCB1 (19-120)	TCX1 (39-121)
480-117295-1	1755 POND DISCHARGE	68	99
480-117295-1 MS	1755 POND DISCHARGE	58	96
480-117295-1 MSD	1755 POND DISCHARGE	68	108
480-117295-2	UPSTREAM SURFACE WATER	69	94
480-117295-4	DOWNSTREAM SURFACE WATER	56	83
LCS 480-355706/2-A	Lab Control Sample	62	96
MB 480-355706/1-A	Method Blank	75	92
Surrogate Legend			
DCB = DCB Decachlorobiphenyl			
TCX = Tetrachloro-m-xylene			

QC Sample Results

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography

Lab Sample ID: MB 480-355462/1-A

Matrix: Solid

Analysis Batch: 355506

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 355462

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND		210	41	ug/Kg		05/03/17 13:40	05/04/17 00:59	1
PCB-1221	ND		210	41	ug/Kg		05/03/17 13:40	05/04/17 00:59	1
PCB-1232	ND		210	41	ug/Kg		05/03/17 13:40	05/04/17 00:59	1
PCB-1242	ND		210	41	ug/Kg		05/03/17 13:40	05/04/17 00:59	1
PCB-1248	ND		210	41	ug/Kg		05/03/17 13:40	05/04/17 00:59	1
PCB-1254	ND		210	97	ug/Kg		05/03/17 13:40	05/04/17 00:59	1
PCB-1260	ND		210	97	ug/Kg		05/03/17 13:40	05/04/17 00:59	1

Surrogate	MB %Recovery	MB Qualifier	Limits	Prepared	Analyzed	Dil Fac
DCB Decachlorobiphenyl	122		65 - 174	05/03/17 13:40	05/04/17 00:59	1
Tetrachloro-m-xylene	108		60 - 154	05/03/17 13:40	05/04/17 00:59	1

Lab Sample ID: LCS 480-355462/2-A

Matrix: Solid

Analysis Batch: 355506

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 355462

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
PCB-1016	2180	2820		ug/Kg		129	51 - 185
PCB-1260	2180	2970		ug/Kg		136	61 - 184

Surrogate	LCS %Recovery	LCS Qualifier	Limits
DCB Decachlorobiphenyl	135		65 - 174
Tetrachloro-m-xylene	129		60 - 154

Lab Sample ID: MB 480-355706/1-A

Matrix: Water

Analysis Batch: 355872

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 355706

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
PCB-1016	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 13:33	1
PCB-1221	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 13:33	1
PCB-1232	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 13:33	1
PCB-1242	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 13:33	1
PCB-1248	ND		0.50	0.18	ug/L		05/04/17 14:24	05/05/17 13:33	1
PCB-1254	ND		0.50	0.25	ug/L		05/04/17 14:24	05/05/17 13:33	1
PCB-1260	ND		0.50	0.25	ug/L		05/04/17 14:24	05/05/17 13:33	1

Surrogate	MB %Recovery	MB Qualifier	Limits	Prepared	Analyzed	Dil Fac
DCB Decachlorobiphenyl	75		19 - 120	05/04/17 14:24	05/05/17 13:33	1
Tetrachloro-m-xylene	92		39 - 121	05/04/17 14:24	05/05/17 13:33	1

Lab Sample ID: LCS 480-355706/2-A

Matrix: Water

Analysis Batch: 355872

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 355706

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
PCB-1016	4.00	4.60		ug/L		115	62 - 130

TestAmerica Buffalo

QC Sample Results

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Method: 8082A - Polychlorinated Biphenyls (PCBs) by Gas Chromatography (Continued)

Lab Sample ID: LCS 480-355706/2-A

Matrix: Water

Analysis Batch: 355872

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 355706

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
PCB-1260	4.00	4.54		ug/L		114	56 - 123
Surrogate	%Recovery	LCS Qualifier	Limits				
DCB Decachlorobiphenyl	62		19 - 120				
Tetrachloro-m-xylene	96		39 - 121				

Lab Sample ID: 480-117295-1 MS

Matrix: Water

Analysis Batch: 355872

Client Sample ID: 1755 POND DISCHARGE

Prep Type: Total/NA

Prep Batch: 355706

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits
PCB-1016	ND		4.00	4.41		ug/L		110	28 - 150
PCB-1260	ND		4.00	2.93		ug/L		73	25 - 131
Surrogate	%Recovery	MS Qualifier	Limits						
DCB Decachlorobiphenyl	58		19 - 120						
Tetrachloro-m-xylene	96		39 - 121						

Lab Sample ID: 480-117295-1 MSD

Matrix: Water

Analysis Batch: 355872

Client Sample ID: 1755 POND DISCHARGE

Prep Type: Total/NA

Prep Batch: 355706

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	Limit
PCB-1016	ND		4.00	5.03		ug/L		126	28 - 150	13	50
PCB-1260	ND		4.00	3.33		ug/L		83	25 - 131	13	50
Surrogate	%Recovery	MSD Qualifier	Limits								
DCB Decachlorobiphenyl	68		19 - 120								
Tetrachloro-m-xylene	108		39 - 121								

TestAmerica Buffalo

QC Association Summary

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

GC Semi VOA

Prep Batch: 355462

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-117295-3	UPSTREAM SEDIMENT	Total/NA	Solid	3550C	
480-117295-5	DOWNSTREAM SEDIMENT	Total/NA	Solid	3550C	
MB 480-355462/1-A	Method Blank	Total/NA	Solid	3550C	
LCS 480-355462/2-A	Lab Control Sample	Total/NA	Solid	3550C	

Analysis Batch: 355506

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-117295-3	UPSTREAM SEDIMENT	Total/NA	Solid	8082A	355462
480-117295-5	DOWNSTREAM SEDIMENT	Total/NA	Solid	8082A	355462
MB 480-355462/1-A	Method Blank	Total/NA	Solid	8082A	355462
LCS 480-355462/2-A	Lab Control Sample	Total/NA	Solid	8082A	355462

Prep Batch: 355706

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-117295-1	1755 POND DISCHARGE	Total/NA	Water	3510C	
480-117295-2	UPSTREAM SURFACE WATER	Total/NA	Water	3510C	
480-117295-4	DOWNSTREAM SURFACE WATER	Total/NA	Water	3510C	
MB 480-355706/1-A	Method Blank	Total/NA	Water	3510C	
LCS 480-355706/2-A	Lab Control Sample	Total/NA	Water	3510C	
480-117295-1 MS	1755 POND DISCHARGE	Total/NA	Water	3510C	
480-117295-1 MSD	1755 POND DISCHARGE	Total/NA	Water	3510C	

Analysis Batch: 355872

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-117295-1	1755 POND DISCHARGE	Total/NA	Water	8082A	355706
480-117295-2	UPSTREAM SURFACE WATER	Total/NA	Water	8082A	355706
480-117295-4	DOWNSTREAM SURFACE WATER	Total/NA	Water	8082A	355706
MB 480-355706/1-A	Method Blank	Total/NA	Water	8082A	355706
LCS 480-355706/2-A	Lab Control Sample	Total/NA	Water	8082A	355706
480-117295-1 MS	1755 POND DISCHARGE	Total/NA	Water	8082A	355706
480-117295-1 MSD	1755 POND DISCHARGE	Total/NA	Water	8082A	355706

General Chemistry

Analysis Batch: 355285

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-117295-3	UPSTREAM SEDIMENT	Total/NA	Solid	Moisture	
480-117295-5	DOWNSTREAM SEDIMENT	Total/NA	Solid	Moisture	

Lab Chronicle

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Client Sample ID: 1755 POND DISCHARGE

Lab Sample ID: 480-117295-1

Date Collected: 05/02/17 09:30

Matrix: Water

Date Received: 05/02/17 11:00

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	3510C			355706	05/04/17 14:24	SMP	TAL BUF
Total/NA	Analysis	8082A		1	355872	05/05/17 14:37	JMO	TAL BUF

Client Sample ID: UPSTREAM SURFACE WATER

Lab Sample ID: 480-117295-2

Date Collected: 05/02/17 09:51

Matrix: Water

Date Received: 05/02/17 11:00

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	3510C			355706	05/04/17 14:24	SMP	TAL BUF
Total/NA	Analysis	8082A		1	355872	05/05/17 14:53	JMO	TAL BUF

Client Sample ID: UPSTREAM SEDIMENT

Lab Sample ID: 480-117295-3

Date Collected: 05/02/17 09:50

Matrix: Solid

Date Received: 05/02/17 11:00

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	Moisture		1	355285	05/03/17 02:40	CSW	TAL BUF

Client Sample ID: UPSTREAM SEDIMENT

Lab Sample ID: 480-117295-3

Date Collected: 05/02/17 09:50

Matrix: Solid

Date Received: 05/02/17 11:00

Percent Solids: 87.6

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	3550C			355462	05/03/17 13:42	MAS	TAL BUF
Total/NA	Analysis	8082A		1	355506	05/04/17 06:49	JMO	TAL BUF

Client Sample ID: DOWNSTREAM SURFACE WATER

Lab Sample ID: 480-117295-4

Date Collected: 05/02/17 10:00

Matrix: Water

Date Received: 05/02/17 11:00

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	3510C			355706	05/04/17 14:24	SMP	TAL BUF
Total/NA	Analysis	8082A		1	355872	05/05/17 15:09	JMO	TAL BUF

Client Sample ID: DOWNSTREAM SEDIMENT

Lab Sample ID: 480-117295-5

Date Collected: 05/02/17 10:02

Matrix: Solid

Date Received: 05/02/17 11:00

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	Moisture		1	355285	05/03/17 02:40	CSW	TAL BUF

TestAmerica Buffalo

Lab Chronicle

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Client Sample ID: DOWNSTREAM SEDIMENT
Date Collected: 05/02/17 10:02
Date Received: 05/02/17 11:00

Lab Sample ID: 480-117295-5
Matrix: Solid
Percent Solids: 92.5

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	3550C			355462	05/03/17 13:42	MAS	TAL BUF
Total/NA	Analysis	8082A		1	355506	05/04/17 07:05	JMO	TAL BUF

Laboratory References:
TAL BUF = TestAmerica Buffalo, 10 Hazelwood Drive, Amherst, NY 14228-2298, TEL (716)691-2600

Accreditation/Certification Summary

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Laboratory: TestAmerica Buffalo

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Program	EPA Region	Identification Number	Expiration Date
New York	NELAP	2	10026	03-31-18

The following analytes are included in this report, but accreditation/certification is not offered by the governing authority:

Analysis Method	Prep Method	Matrix	Analyte
Moisture		Solid	Percent Moisture
Moisture		Solid	Percent Solids

Method Summary

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Method	Method Description	Protocol	Laboratory
8082A	Polychlorinated Biphenyls (PCBs) by Gas Chromatography	SW846	TAL BUF
Moisture	Percent Moisture	EPA	TAL BUF

Protocol References:

EPA = US Environmental Protection Agency

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

TAL BUF = TestAmerica Buffalo, 10 Hazelwood Drive, Amherst, NY 14228-2298, TEL (716)691-2600

Sample Summary

Client: Golder Associates Inc.
Project/Site: Golder - Niagara Transformer site

TestAmerica Job ID: 480-117295-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
480-117295-1	1755 POND DISCHARGE	Water	05/02/17 09:30	05/02/17 11:00
480-117295-2	UPSTREAM SURFACE WATER	Water	05/02/17 09:51	05/02/17 11:00
480-117295-3	UPSTREAM SEDIMENT	Solid	05/02/17 09:50	05/02/17 11:00
480-117295-4	DOWNSTREAM SURFACE WATER	Water	05/02/17 10:00	05/02/17 11:00
480-117295-5	DOWNSTREAM SEDIMENT	Solid	05/02/17 10:02	05/02/17 11:00

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

Temperature on Receipt _____

Drinking Water? Yes ☐ No ☒

Chain of Custody Record

TAL-4124 (1007)

Client GOLDEN ASSOCIATES INC		Project Manager PATRICK MARTIN	Date 5/2/17	Chain of Custody Number 296869
Address 2430 N. FOREST RD., STE 100		Telephone Number (Area Code)/Fax Number 716-204-5880	Lab Number	
City GETZVILLE	State NY	Zip Code 14068	Page 1	of 1

Project Name and Location (State)		Site Contact	Lab Contact	Analysis (Attach list if more space is needed)
NTC 1755 DALE RD SITE SMP		B. FISCHER		
Contract/Purchase Order/Quote No. 8093-8914402		Carrier/Waybill Number		
Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix	Containers & Preservatives
			Air	Unpres.
			Sed.	H2SO4
			Aqueous	HNO3
				HCl
				NaOH
				ZnAc/NaOH
1755 Pond Discharge	5/2/17	0930	X	2
Upstream surface water		0951	X	2
Upstream sediment		0950	X	1
Downstream surface water		10:00	X	2
Downstream sediment		10:02	X	1

Possible Hazard Identification
☒ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown
 Turn Around Time Required
☐ 24 Hours ☐ 48 Hours ☐ 7 Days ☐ 14 Days ☐ 21 Days ☐ Other _____
 Sample Disposal
☐ Return To Client ☐ Disposal By Lab ☐ Archive For _____ Months (A fee may be assessed if samples are retained longer than 1 month)

1. Relinquished By Patrick J. Martin	Date 5/2/17	Time 11:00
2. Relinquished By	Date	Time
3. Relinquished By	Date	Time

Comments
4.8

DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Stays with the Sample; PINK - Field Copy

Login Sample Receipt Checklist

Client: Golder Associates Inc.

Job Number: 480-117295-1

Login Number: 117295

List Source: TestAmerica Buffalo

List Number: 1

Creator: Janish, Carl M

Question	Answer	Comment
Radioactivity either was not measured or, if measured, is at or below background	True	
The cooler's custody seal, if present, is intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the sample IDs on the containers and the COC.	True	
Samples are received within Holding Time (Excluding tests with immediate HTs)..	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
VOA sample vials do not have headspace or bubble is <6mm (1/4") in diameter.	True	
If necessary, staff have been informed of any short hold time or quick TAT needs	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Sampling Company provided.	True	GOLDER
Samples received within 48 hours of sampling.	True	
Samples requiring field filtration have been filtered in the field.	N/A	
Chlorine Residual checked.	N/A	

APPENDIX B

ANNUAL SITE INSPECTION FORM & PHOTO LOG DOCUMENTATION

Niagara Transformer Corporation
ERIE, NEW YORK

Site Management Plan

NYSDEC Site Number: C915234

SITE-WIDE INSPECTION FORM

Inspection Item Description	Frequency	Comments	Corrective Action (If Required)
BCP Site General Conditions	Annually	GOOD CONDITION - MINOR SNOW PLOW DAMAGE	- PERFORM MINOR LANDSCAPING REPAIRS TO BERM PERIMETERS - RESTORATION OF TOPSOIL (SPRING 2017)
Excavation Work Locations - General Conditions	Per Occurrence	EXCAVATIONS FOR UTILITY CONNECTIONS TO NEW WAREHOUSE ON RT41 - WEST SIDE / PROPERTY LINE	- RESTORATION & SEEDING TO BE PERFORMED IN MAY 2017. SOIL INSPECTED & TESTED - NO CONTAMINATION.
Stormwater Retention Pond- Outfall Sampling Location General Condition	Annually	GOOD CONDITION NO SEDIMENT ACCUM. OR FLOW RESTRICTIONS	NONE
SOIL BEAMS	ANNUALLY	ALL BEAMS VEGETATED - MINOR DAMAGE TO EDGES OF BEAMS ADJ. TO PAVEMENT	SEE ABOVE FOR "GENERAL SITE CONDITIONS"

5/2/17

PATRICK T. MARTIN
District 1 Monitor

**Project Title: Site Management Plan: Niagara Transformer Corp. – PRR Site Inspection****PHOTO 1**

Looking North: Eastern Side of Building (HVAC & Transformer staging areas) and Property Line adjacent to Retention Pond on East Parcel

5/2/17

**PHOTO 2**

Looking Southeast: North Side of East Soil Berm

5/2/17





PHOTO 3

Looking Northeast: South
and West Sides of East Soil
Berm

5/2/17



PHOTO 4

Looking North: South Side
of West Soil Berm

5/2/17





PHOTO 5

Looking West: South Side
of West Berm

5/2/17



PHOTO 6

Looking North: West Side of
Building adjacent to Internal
access Road

5/2/17



**PHOTO 7**

Looking East: Parallel to South Property Line behind Building

5/2/17

**PHOTO 8**

Looking North: Western Property Line (water and gas utility installation /connection area for new warehouse on 1747). To be restored late May 2017.

5/2/17





PHOTO 9

Looking North: Western
side of East Berm at
Property Entrance

5/2/17



APPENDIX C

**SITE C915234 SITE MANAGEMENT PLAN PERIODIC REVIEW REPORT - 2017 ICS-
ECS CERTIFICATION FORM**



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



Site Details

Box 1

Site No. C915234

Site Name Niagara Transformer Corp.

Site Address: 1755 Dale Road Zip Code: 14225
City/Town: Cheektowaga
County: Erie
Site Acreage: 3.2

Reporting Period: June 15, 2016 to June 15, 2017

YES NO

1. Is the information above correct? ☒ YES ☐ NO

If NO, include handwritten above or on a separate sheet.

2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period? ☐ YES ☒ NO

3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))? ☐ YES ☒ NO

4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? ☐ YES ☒ NO

If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.

5. Is the site currently undergoing development? ☐ YES ☒ NO

Box 2

YES NO

6. Is the current site use consistent with the use(s) listed below?
Industrial ☒ YES ☐ NO

7. Are all ICs/ECs in place and functioning as designed? ☒ YES ☐ NO

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

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

Signature of Owner, Remedial Party or Designated Representative

Date

Box 2A

YES NO

8. Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?

☐☒

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

9. Are the assumptions in the Qualitative Exposure Assessment still valid?
(The Qualitative Exposure Assessment must be certified every five years)

☒☐

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

SITE NO. C915234**Box 3****Description of Institutional Controls**ParcelOwnerInstitutional Control

102.03-3-6.1

Niagara Transformer Corp.

Ground Water Use Restriction
Monitoring Plan
IC/EC Plan
Landuse Restriction
Site Management Plan

The Site Management Plan includes:

- An Institutional Controls Plan. Institutional controls at the site will include groundwater use restrictions and use restrictions of the Site to restricted use (i.e. industrial purposes).
- A Soil/Fill Management Plan to assure that future intrusive activities and soil/fill handling at the Site are completed in a safe and environmentally responsible manner.
- A Site Monitoring Plan that includes: provisions for a limited stormwater monitoring plan; and,
- A Site-wide Inspection program to assure that the Institutional controls have not been altered and remain effective.

Box 4**Description of Engineering Controls**

None Required

Not Applicable/No EC's

Periodic Review Report (PRR) Certification Statements

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

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

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

YES NO



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

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

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

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

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

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

YES NO



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

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

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. C915234

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

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

I PATRICK T. MARTIN at 2430 N. FOREST RD., GETZVILLE, NY 14068
print name print business address

am certifying as OWNER (Owner or Remedial Party)

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

Patrick T. Martin
Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

6/16/17
Date