cornerstone PLLC

100 Crystal Run Road, Suite 101, Middletown, NY 10941
T 877.294.9070 | F 845.692.5894 | W www.cornerstoneeg.com

July 17, 2023

Parag Amin, P.E.
Project Manager, Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway, Albany, NY 12233-7014

Re: Quarterly Progress Report – 2nd Quarter 2023
Harriman Inactive Waste Disposal Site #336006

Dear Mr. Amin:

On behalf of Warner-Lambert Company LLC and Nepera, Inc. (Parties), this letter and inspection reports provide the Second Quarter 2023 project progress report for the Harriman Inactive Waste Disposal Site (the site), located in Harriman, New York. Due to the presence of other remediation programs and voluntary investigative work being performed at the site, this report includes activities that are beyond the scope of the Parties' obligations under the Consent Decree.

Site Remediation Activities Performed (April - June 2023)

The interim cover along the West Branch of the Ramapo River was inspected on June 21, 2023 and representative photos of this area are provided as Attachment 1. The interim cover remains in good condition. The cover vegetation is stable, well vegetated, and there are no signs of erosion.

The parking lot pavement remains generally intact and functioning as a cover. The parking lot was inspected on June 21, 2023. Representative photos of the parking lot conditions are provided as Attachment 2.

The quarterly well inspection report is provided for reference as Attachment 3. The monitoring well network in the routine five-quarter monitoring program remains in good condition and functional as noted in the attached summary tabulation from the June 21, 2023 inspection. New wells installed in August 2020 and October 2021, while not part of the five-quarter monitoring program, have been included within the inspection checklist.

As described in the second quarter 2016 progress report, product was not observed on the absorbent socks in wells SVE-1, SVE-3, SVE-4, and VER-2 during the December 2015 and March 2016 inspections; therefore, the absorbent socks were removed during the June 2016 inspection, with the intent of checking the wells for sheen or product without the absorbent socks present. Since removal of the absorbent socks in June 2016, the wells have been checked during each inspection for evidence of product or sheen, both visually and with an interface probe, and during the April 2017 inspection, an absorbent sock was placed in VER-2 based on an observed

sheen, and an absorbent sock remains in this well as noted in the attached inspection report. The absorbent sock was at 25% capacity when inspected on June 21, 2023, and the sock was not replaced during the inspection. Wells SVE-1, SVE-3, and SVE-4 continue to not have any evidence of product or sheen and, therefore, the Parties have discontinued the use of absorbent socks in these wells with approval from the NYSDEC. The quarterly SVE/VER well inspection form is provided for reference as Attachment 3.

The IRM groundwater extraction system components remain off-line on standby per the NYSDEC's approval pending the completion of the Supplemental Remedial Action Work Plan, including continued groundwater monitoring, and evaluation of the appropriateness of an ESD. Because of the ELT Harriman, LLC demolition work, the groundwater extraction system components were dismantled, and the condition of subsurface components is unknown; but the system can likely be restored, if necessary.

As requested by the NYSDEC, site-wide fencing, Area F and the Building 35 area were also inspected on June 21, 2023. Inspection logs and photos for these areas are included within Attachments 4 and 5.

A draft Interim Site Management Plan (ISMP) was submitted by the Parties and ELT Harriman, LLC (ELT) to the NYSDEC on June 30, 2022. Comments were received from the NYSDEC on December 1, 2022 and a revised ISMP was submitted to the NYSDEC on July 7, 2023.

The Parties and ELT submitted a draft Emerging Contaminant (EC) Report to the NYSDEC on September 27, 2022. Comments to the report were received from the Department on January 6, 2023. Certain additional information related to the Gaess Environmental Site was subsequently obtained independently by the Parties, and counsel for the Parties and the Department have been in communication since that time. As discussed with the Department during the March 13, 2023 Technical Call, the Department requested that the Parties submit a Response to Comment (RTC) Letter to the Department in advance of submitting a revised EC Report so that potential issues could be resolved in advance of revising the EC Report. A RTC letter was subsequently submitted by the Parties to the Department on April 7, 2023. The Department responded to this letter on June 15, 2023 and the Parties and ELT submitted a response on July 14, 2023. The revised report is anticipated to be submitted during July 2023.

The Department issued a letter to the Parties and ELT on October 26, 2022 indicating that, since Per- and polyfluorinated substances (PFAS) were identified in groundwater monitoring wells at the northern edge of the site at concentrations above New York Groundwater Quality Standards, the Parties were to implement an interim Remedial Measure (IRM) to prevent potential migration of PFAS compounds to the adjacent Ramapo River. The Parties held a phone call with the Department on November 2, 2022 and submitted a follow up email on November 4, 2022 summarizing their position that an IRM was not necessary based upon the site data and other considerations. As indicated during the call and follow-up email to the Department, the NYSDEC conducted groundwater and surface water sampling at the Site in June 2017. The surface water sampling results indicated that PFAS concentrations upstream and downstream of the former Nepera Site were similar, indicating little or no contribution

from the site. In addition, a comparison of the June 2017 groundwater monitoring results to results obtained in September 2020 and June 2022 from the same well locations show similar concentrations, indicating that the Site wide conditions have not changed over the past five years. Given those data, the Parties and ELT proposed that an IRM was not necessary, and that the most appropriate action would be to gather additional groundwater and surface water data during the upcoming Phase 3 Emerging Contaminant investigation. The additionally collected data would then be assessed to determine what, if any, remedial actions are required as part of the RI/FS process. The Department submitted an email to the Parties and ELT on December 21, 2022 concurring with this recommendation.

The Parties and ELT submitted a draft Summary Project Schedule to the NYSDEC on December 12, 2022. Comments were received from the Department on December 12, 2022 and the Parties and ELT submitted a revised Summary Project Schedule to the Department on January 6, 2023 and it was approved by the Department on January 10, 2023. Revisions to this schedule are necessary to reflect modified submittal and/or agency review schedules for the Supplemental Floodplain Soil Investigation Report, the EC Report, the ISMP and the Parking Lot FS. The modified schedule will be communicated to the Department once it is more clearly known.

The Parties and ELT submitted a draft Supplemental Floodplain Soil Investigation Report to the Department on March 4, 2023. The Department provided comments to this report on June 1, 2023 and the Parties and ELT are preparing a response for submission to the Department during July 2023.

<u>Activities for the third quarter 2023 (July - September 2023)</u>

- Submit a revised ISMP;
- Submit a revised Supplemental Floodplain Soil Investigation Report;
- Submit a revised Emerging Contaminant Investigation Report and Work Plan;
- Submit a revised EC Submit a revised Parking Lot Feasibility Study;
- Perform the regularly scheduled, quarterly monitoring well, parking lot, and riverbank inspections; and
- Perform parking lot maintenance as needed.

Please do not hesitate to contact us should you have any questions or comments.

Sincerely,

Cornerstone Engineering and Geology, PLLC

Erich Zimmerman, P.E.
Client Services Manager

Enclosures: Attachment 1 – Streambank Inspection Photos
Attachment 2 – Parking Lot Photos
Attachment 3 – Well Inspection Logs
Attachment 4 – Fencing Inspection Photos
Attachment 5 – Area F and Building 35 Area Photos

cc: K. Maloney – NYSDEC
A. Perretta - NYSDOH
S. Levine - Cambrex
C. Clark – Warner Lambert
J. Caputi – Brown & Caldwell
M. Robinson – ELT Harriman

ATTACHMENT 1
STREAMBANK INSPECTION PHOTOS

RIVERBANK INSPECTION FORM
WEST BRANCH OF THE RAMAPO RIVER
MAYBROOK AND HARRIMAN TRUST
HARRIMAN, NEW YORK

DATE: 21-Jun-23

INSPECTION (Check): ANNUAL _____

INSPECTOR: Ian T. Carrick

QUARTERLY X

	STATUS	COMMENTS
A. General condition of cover material	Good	Riverbank cover in good condition, no signs of erosion, no white material showing. High vegetation in area. (pictures included).
B. Settlement of covered area	Adequate	Potholes present in parking lot area, although pavement cover generally remains intact. (pictures included). 20 total potholes.
C. General condition of silt fence	N/A	Silt fence has been removed from stream bank per NYSDEC approval on January 12, 2016.

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ATTACHMENT 1
STREAMBANK VEGETATION PHOTOS TAKEN JUNE 21, 2023

ATTACHMENT 2
PARKING LOT PHOTOS

ATTACHMENT 2
PARKING LOT PHOTOS TAKEN JUNE 21, 2023

ATTACHMENT 2
PARKING LOT PHOTOS TAKEN JUNE 21, 2023

ATTACHMENT 3
WELL INSPECTION LOGS

Former Nepera Plant - Harriman, NY: Quarterly Well Inspection Report Date 6/21/2023

Monitoring Well	Diameter Inches	Finish	Collar	Lid	Plug	Lock	Tag	Casing	Comments	Action Items
MW-1S*	6	Stickup	OK	OK	OK	OK	OK	OK		
MW-2S	4	Stickup	OK	OK	OK	OK	OK	D	Casing is sheared off a few feet below top of ground.	No repair planned, well not in use, possible future abandonment
MW-3S	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-4S	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-5S*	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-7S*	4	Stickup	OK	OK	OK	OK	OK	OK	Well is behind chain link fence that leads up to the river bank.	
MW-8S*	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-9S	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-11S*	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-12S*	2	Flushmount	OK	OK	OK	OK	OK	OK		
MW-13S	2	Flushmount	OK	OK	OK	OK	OK	OK		
MW-16S*	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-20S*	4	Flushmount	OK	OK	OK	OK	OK	OK		
MW-21S	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-24S*	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-25S*	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-27S	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-33S*	2	Flushmount	OK	OK	OK	OK	OK	OK		
MW-35S*	2	Flushmount	OK	OK	OK	OK	OK	OK		
MW-36S	2	Flushmount	OK	OK	OK	OK	OK	OK		
MW-37S*	2	Flushmount	OK	OK	OK	OK	OK	OK		
OW-6	2	Stickup	OK	OK	OK	OK	OK	OK		
OW-7*	2	Stickup	OK	OK	OK	OK	OK	D	PVC inside well casing is detached.	Exercise care when removing plug for sampling so as not to detach casing.
R-1	6		NI	NI	NI	NI	NI	NI	Well no longer exists	
RW-1**	6	Vault	NI	NI	NI	NI	NI	NI		
RW-1R*	6	Vault	OK	OK	OK	OK	OK	OK		
MW-53D*	4	Flushmount	OK	OK	OK	OK	OK	OK		
PZ-1	2	Stickup	OK	OK	OK	OK	OK	OK		
PZ-2	2	Flushmount	OK	OK	OK	OK	OK	OK	Well abandoned	
PZ-3	2	Flushmount	D	OK	OK	OK	OK	OK		Collar still secure
MW-15S	4	Stickup	OK	OK	OK	OK	OK	OK	Well abandoned	
MW-17S	4	Stickup	OK	OK	OK	OK	OK	D		

Former Nepera Plant - Harriman, NY: Quarterly Well Inspection Report Date 6/21/2023

Monitoring Well	Diameter Inches	Finish	Collar	Lid	Plug	Lock	Tag	Casing	Comments	Action Items
MW-19S	4	Stickup	OK	OK	OK	OK	OK	D	Well abandoned	
MW-22S(1)	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-23S(1)	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-26S	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-28S(2)	2	Stickup	OK	OK	OK	OK	OK	OK		
MW-29S(2)	2	Stickup	OK	OK	OK	OK	OK	OK		
MW-34	2	Flushmount	OK	OK	OK	OK	OK	OK		
MW-35AQ	2	Flushmount	OK	OK	OK	OK	OK	OK		
MW-36AQ	2	Flushmount	OK	OK	OK	OK	OK	OK		
MW-37AQ	2	Flushmount	OK	OK	OK	OK	OK	OK		
MW-53S	4	Flushmount	OK	OK	OK	OK	OK	OK		
PZ-4	2	Stickup	OK	OK	OK	OK	OK	OK		
MW-6D*	4	Stickup	OK	OK	OK	OK	OK	OK	Well is behind a chain link fence that leads upto the river bank.	
MW-10D	6	Stickup	OK	OK	X	OK	OK	OK	No plug, tubing is tied off inside of well, Inner casing too far down to plug.	
MW-18D	6	Stickup	OK	OK	X	OK	OK	OK	Inner casing too far down to plug.	No repair planned, well not in use, possible future abandonment.
MW-20D*	4	Flushmount	OK	OK	OK	OK	OK	OK		
MW-21D	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-23D(1)*	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-25D	4	Stickup	OK	OK	OK	OK	OK	OK		
MW-26D*	2	Stickup	OK	OK	OK	OK	OK	OK		
MW-27D*	6	Stickup	OK	OK	OK	OK	OK	OK		
R-2D	10	Stickup	NI	NI	NI	NI	NI	NI	Shed removed	Well not In use
R-3D	10	Stickup	OK	OK	X	X	OK	OK	Large metal plate covering well	

Former Nepera Plant - Harriman, NY: Quarterly Well Inspection Report Date 6/21/2023

Monitoring Well	Diameter Inches	Finish	Collar	Lid	Plug	Lock	Tag	Casing	Comments	Action Items
MW-101*	2	Flushmount	OK	OK	OK	OK	OK	OK		
MW-102*	2	Stickup	OK	OK	OK	OK	OK	OK		
MW-103*	2	Flushmount	OK	OK	OK	OK	OK	OK		
MW-104*	2	Flushmount	OK	OK	OK	OK	OK	OK		
MW-105*	2	Stickup	OK	OK	OK	OK	OK	OK		
MW-106*	2	Stickup	OK	OK	OK	OK	OK	OK		
20 DR*	2	Flushmount	OK	OK	OK	OK	OK	OK		
MW-201	2	Stickup	OK	OK	OK	OK	OK	OK		
MW-202S	2	Stickup	OK	OK	OK	OK	OK	OK		
MW-202D	2	Stickup	OK	OK	OK	OK	OK	OK		
MW-203	2	Stickup	OK	OK	OK	OK	OK	OK		
AP-101	2	Stickup	OK	OK	OK	OK	OK	OK		
BP-101	2	Stickup	OK	OK	OK	OK	OK	OK		
AMW-1	2	Stickup	OK	OK	OK	OK	OK	OK		
AMW-2	2	Stickup	OK	OK	OK	OK	OK	OK		
AMW-3	2	Stickup	OK	OK	OK	OK	OK	OK		
AMW-4	2	Stickup	OK	OK	OK	OK	OK	OK		
AMW-5	2	Stickup	OK	OK	OK	OK	OK	OK		
AMW-6	2	Stickup	OK	OK	OK	OK	OK	OK		
AMW-7	2	Stickup	OK	OK	OK	OK	OK	OK		
AMW-8	2	Stickup	OK	OK	OK	OK	OK	OK		
AMW-9	2	Stickup	OK	OK	OK	OK	OK	OK		
AMW-10	2	Stickup	OK	OK	OK	OK	OK	OK		
AMW-11	2	Stickup	OK	OK	OK	OK	OK	OK		

New wells installed August 2020

New wells installed October 2021

Field Technician: Ian T. Carrick

(1) Off-Site Wells.
(2) Erosion Evaluation Wells
** RW-1 was replaced by RW-1R

X = Item Missing
B = Bolts Missing
NI = NOT INSPECTED

D = Damaged
OK = Acceptable Condition
*Part of Monitoring Program

SVE/VER Product Measurement Checklist

Recorded By: Ian T. Carrick
Date: 6/21/2023

DTP	DTW		
0	0		SVE-1
0	2.51		SVE-2
0	2.01		SVE-3
0	1.71		**SVE-4

		DTP	DTW
	VER-1	0	4.2
	*VER-2	0	4.54
	VER-3	0	3.99
	VER-4	0	4.32

To Entrance/Exit

N

NOTE: SVE wells are closer to the side of the road.
VER-1 and SVE-1 are both 4" wells. All others are 2" diameter.
Indicates absorbent sock in well.

Comments:

Wells checked for potential presence of product after absorbent socks removed.
*Absorbent sock at 25% capacity at VER-2. Absorbent sock not replaced.
Presence of product or sheen not observed in remaining wells.
* *Bottom of SVE-4 partially filled in during prior demolition work. (Bottom at 2.65 ft)

ATTACHMENT 4
FENCE INSPECTION PHOTOS

SITE FENCE INSPECTION FORM
MAYBROOK AND HARRIMAN TRUST
HARRIMAN, NEW YORK

DATE: 21-Jun-23

INSPECTION (Check): ANNUAL _____

INSPECTOR: Ian T. Carrick

QUARTERLY X

	STATUS	COMMENTS
A. Perimeter Fence around NEPERA Facility	Good	Fence in good condition, high amount of vegetation growing on all portions of the fence that does not border NY-17. Two areas damaged.
B. Perimeter fence around NEPERA Parking Lot	FAIR	Fence in fair condition, eastern section of fence cut by Orange and Rockland Company for guide lines for utility pole.
C. Perimeter fence around lagoon area	FAIR	Fence in fair condition, southern section of fence cut in two areas adjacent to MW-29S.

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ATTACHMENT 4
FENCING INSPECTION FORM AND PHOTOS TAKEN JUNE 21, 2023

ATTACHMENT 5
AREA F AND BUILDING 35 AREA PHOTOS

ATTACHMENT 5
AREA F PHOTOS TAKEN JUNE 21, 2023

ATTACHMENT 5
BUILDING 35 PHOTOS TAKEN JUNE 21, 2023