

Memorandum

July 17, 2025

To: Caroline Jalanti, New York State Department of Environmental Conservation (NYSDEC)

From: Tim DiGiulio, PE, and Tim Johnson

cc: Kerry Maloney, NYSDEC; Seth Levine, Nepera, Inc.; Eric Gaulin, Warner-Lambert Company, LLC; Matt Robinson, ELT Harriman; Jeff Caputi, Brown and Caldwell

Re: First Quarter 2025 Semi-Annual Inspection and Progress Report; Harriman Inactive Waste Disposal Site No. 336006

Introduction

This memorandum and the attached inspection reports constitute the first quarter 2025 progress report for the Harriman Inactive Waste Disposal Site (the Site) on behalf of Nepera, Inc., and Warner-Lambert Company, LLC (Corporate Defendants) and ELT Harriman, LLC (ELT).

This memorandum covers the full scope of the semi-annual and quarterly site inspection requirements pursuant to the February 2025 Interim Site Management Plan (ISMP). But because of the concurrence of other remediation programs and voluntary investigative work being performed at the Site, this report, like previous reports, also includes activities that are beyond the scope of the parties' obligations under the Consent Decree and the ISMP.

Site Inspection

The site inspection was performed on March 24, 2025, by Anchor QEA staff. In accordance with the ISMP notification requirements, Anchor QEA notified the New York State Department of Environmental Conservation (NYSDEC) 7 days prior to conducting the quarterly inspection.

Monitoring Wells

The quarterly well inspection report covers 76 monitoring wells. Visual observations were conducted at all 76 wells to evaluate each well's collar, plug, lid, lock, tag, and casing. Reduced vegetation in March allowed access to wells normally inaccessible during warmer months.

The components of all 76 monitoring wells remain in satisfactory condition, with exceptions noted in the monitoring well summary forms in Attachment 1. Two wells were observed to have casing deficiencies. The lid on one well was rusted to the collar, but both the collar and the lid remained intact after opening with additional force. Three wells were missing locks, and all the missing locks were replaced during the inspection. Because no damage that would interfere with planned field activities was observed, additional well repairs or abandonment will be assessed during the next routine groundwater monitoring event.

Former Soil Vapor Extraction Well In Situ Product Removal

As outlined in Section 3.3.4 of the ISMP, product has historically been observed in soil vapor extraction (SVE) well VER-2. An absorbent sock was placed in that well, and the sock was monitored during subsequent site inspections. The absorbent sock was last replaced on December 14, 2023, during the Phase III Emerging Contaminant Investigation program. The sock was at 100% capacity when VER-2 was inspected on March 24, 2025, and was replaced

Absorbent socks were placed in four other wells (SVE-2, SVE-3, VER-1, and VER-3) on March 1, 2024, after a thin layer of product was detected by the interface probe. During the March 24, 2025, inspection, three of the absorbent socks in the four wells had slight discoloration, although product was detected in only two of the wells (0.01 inch each in wells SVE-3 and VER-1). The discoloration on the sock in VER-1 was a dark orange, in contrast to the brown or light-yellow discoloration of socks historically present in other soil vapor extraction wells. The photoionization detector (PID) readings in the vicinity of the sock were non-detect, further indicating that the dark orange substance was likely not the product found in other wells. Because only approximately 20% of the sock was discolored, the sock was not replaced. Monitoring well SVE-1 was inundated, and a depth-to-water reading could not be collected. No sheen was observed on the pooled water at this location. No product was observed in wells SVE-2, SVE-4, VER-3, or VER-4.

Future inspections will continue to monitor the socks in these five wells. The semi-annual SVE/VER well inspection form is provided for reference in Attachment 1.

Streambank Interim Cover

The interim riverbank turf reinforcement mat and vegetative cover system along the West Branch of the Ramapo River was inspected. Representative photographs of the area and the inspection form are provided in Attachment 2. Observations of the cover system showed vegetation with no significant signs of erosion and the system functioning as designed.

Parking Lot

Section 3.4.1 of the ISMP addresses the interim control and integrity of the parking lot asphalt cover. Deficiencies identified during the fourth quarter 2023 inspection were patched and repaired on December 4 and 5, 2023. As with the fourth quarter 2024 inspection, there were some small, localized areas with limited subsidence of the asphalt; however, the asphalt remains intact and continues to provide erosion protection for materials beneath the parking lot area. Representative photographs of the parking lot conditions are provided in Attachment 2.

Former Excavation Areas F and Building 53

Section 3.4.2 of the ISMP requires the inspection of former excavation and backfill areas to evaluate them for signs of significant erosion or vandalism. Areas of Building 53 and Area F were observed to

contain vegetation with no visual evidence of disturbance or erosion. The inspection form and photographs for these areas are provided in Attachment 3.

Site Perimeter Fencing

Section 3.4.6 of the ISMP requires visual inspections of the fence and gates to restrict unauthorized access to the Site. During the site inspection, the fence perimeter was visually inspected and it was observed that the fencing on the north side of the parking lot, adjacent to the river, was damaged. Access is likely restricted due to the location and extent of vegetation present, but repairs can be made as appropriate. The section of the fence adjacent to the parking lot that was repaired on March 26, 2024, was observed to be in good condition. Additional photographs and inspection forms are provided in Attachment 4.

Handling of Soil Pile

As covered in the First Quarter 2024 Semi-Annual Inspection and Progress Report, soil and building debris were illegally dumped on the property on or before February 23, 2024. ELT subsequently moved and secured the soil pile atop a former building slab in the plant site area to prevent interaction with site soil, groundwater, or surface runoff. ELT also collected a composite sample of the soil pile, which was analyzed for volatile organic compounds, semivolatile organic compounds, polychlorinated biphenyls, metals, PFAS, and Resource Conservation and Recovery Act (RCRA) waste characteristics. The full results of the sampling were presented in the First Quarter 2024 Semi-Annual Inspection and Progress Report; four compounds (acetone, p,p'-DDE, p,p'-DDT, and nickel) were above the Unrestricted Use Soil Cleanup Objective (SCO) but below the Commercial Use SCO. The soil pile remains on site and disposal of the soil will be handled in conjunction with remedial actions for the Site.

Summary of First Quarter 2025 Activities

The following is a summary of activities from the first quarter of 2025:

- The revised Phase III Emerging Contaminants Report was submitted to NYSDEC for review on February 28, 2025, and was accepted by NYSDEC on April 15, 2025.
- The revised ISMP was submitted to NYSDEC for review on February 28, 2025. It was conditionally accepted on April 10, 2025, and the revised document with the requested changes was accepted and approved on April 16, 2025.
- A team progress call was held with NYSDEC on April 1, 2025.
- A full site inspection—including all 76 monitoring wells, SVE/VER wells, riverbank cover, parking lot asphalt cap, site fence, and former drum excavation areas—was conducted on March 24, 2025.
- The following well maintenance tasks were completed during the first quarter 2025 inspection:

- Installed three well locks
 - Opened one well which was rusted shut
- Data collection for the Periodic 5-Quarter Groundwater Monitoring program was conducted from March 25 to March 28, 2025. The Groundwater Monitoring Report that summarizes the data is provided with this report.

Projected Second and Third Quarter 2025 Activities

The following activities are planned for the second and third quarters (June to October) of 2025:

- Development and submittal of a draft list of remedial alternatives to NYSDEC for Remedial Areas 2 and 3.
- Meetings with NYSDEC with efforts towards finalizing the remedial alternatives.
- Second and third quarter site inspections with corresponding reports to NYSDEC.

Attachments

Attachment 1 First Quarter 2025 Semi-Annual Well Inspection Report

Attachment 2 Streambank and Parking Lot Inspection Photographs and Log

Attachment 3 Area F and Building 53 Area Photographs and Log

Attachment 4 Fence Inspection Photographs and Log

Attachment 1

First Quarter 2025 Semi-Annual Well
Inspection Report

First Quarter 2025 Semi-Annual Well Inspection Report

Monitoring Well	Diameter (in.)	Finish	Routine Monitoring Well	Well Condition (see notation types below)						Comments	Action Items
				Collar	Lid	Plug	Lock	Tag	Casing		
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		
AMW-12	2	Stickup		OK	OK	OK	OK	OK	OK		
AP-101	2	Stickup		OK	OK	OK	OK	OK	OK		
AP-201D	2	Stickup		OK	OK	OK	OK	OK	OK		
AP-201S	2	Stickup		OK	OK	OK	OK	OK	OK		
BP-101*	2	Stickup		OK	OK	OK	OK	OK	OK		
MW-1S	6	Stickup	Chemistry, Water level	NA	NA	OK	NA	NA	OK		
MW-2S	4	Stickup	Water level	OK	OK	OK	OK	OK	D	Upper PVC well casing disconnected, maybe sheared off below ground.	Possible casing repair to be evaluated if well is needed for future sampling.
MW-3S	4	Stickup	Water level	OK	OK	OK	OK	OK	OK	Lock replaced.	
MW-4S	4	Stickup	Water level	OK	OK	OK	OK	OK	OK	Lock replaced.	

First Quarter 2025 Semi-Annual Well Inspection Report

Monitoring Well	Diameter (in.)	Finish	Routine Monitoring Well	Well Condition (see notation types below)						Comments	Action Items
				Collar	Lid	Plug	Lock	Tag	Casing		
MW-5S	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-6D	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-7S	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-8S	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-9S	4	Stickup	Water level	OK	D	OK	OK	OK	OK	Lid was rusted shut. Lid forcibly opened.	Collar and lid remain intact.
MW-10D	6	Stickup		OK	OK	X	X	X	X	No plug, tubing is tied off inside of well, Inner casing too far down to plug.	Possible casing repair to be evaluated if well is needed for future sampling.
MW-11S	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-12S	2	Flush-mount	Chemistry, Water level	OK	OK	OK	NA	OK	OK		
MW-13S	2	Flush-mount	Water level	OK	OK	OK	NA	OK	OK		
MW-16S	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-17S	4	Stickup		OK	OK	OK	OK	OK	D	PVC casing broken off ~2' within metal casing.	Possible casing repair to be evaluated if well is needed for future sampling.

First Quarter 2025 Semi-Annual Well Inspection Report

Monitoring Well	Diameter (in.)	Finish	Routine Monitoring Well	Well Condition (see notation types below)						Comments	Action Items
				Collar	Lid	Plug	Lock	Tag	Casing		
MW-18D	6	Stickup		D	OK	X	NA	OK	X	Inner casing too far down to plug. Possible redevelopment due to sedimentation.	Possible casing repair to be evaluated if well is needed for future sampling.
MW-20D	4	Flush-mount	Chemistry, Water level	OK	OK	OK	NA	OK	OK		
MW-20DR	2	Flush-mount	Chemistry, Water level	OK	OK	OK	NA	OK	OK		
MW-20S	4	Flush-mount	Chemistry, Water level	OK	OK	OK	NA	OK	OK		
MW-21D	4	Stickup		OK	OK	OK	OK	OK	OK		
MW-21S	4	Stickup	Water level	OK	OK	OK	OK	OK	OK		
MW-22S*	4	Stickup		OK	OK	OK	OK	OK	OK		
MW-23D*	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-23S*	4	Stickup		OK	OK	OK	OK	OK	OK		
MW-24S	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-25D	4	Stickup		OK	OK	OK	OK	OK	OK		
MW-25S	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-26D	2	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-26S	4	Stickup		OK	OK	OK	OK	OK	OK		

First Quarter 2025 Semi-Annual Well Inspection Report

Monitoring Well	Diameter (in.)	Finish	Routine Monitoring Well	Well Condition (see notation types below)						Comments	Action Items
				Collar	Lid	Plug	Lock	Tag	Casing		
MW-27D	6	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-27S	4	Stickup	Water level	OK	OK	OK	OK	OK	OK		
MW-28S	2	Stickup		OK	OK	OK	OK	OK	OK		
MW-29S	2	Stickup		OK	OK	OK	OK	OK	OK		
MW-33S	2	Flush-mount	Chemistry, Water level	OK	OK	OK	OK	NA	OK		
MW-34	2	Flush-mount		OK	OK	OK	OK	NA	OK		
MW-35AQ	2	Flush-mount		OK	OK	OK	NA	OK	OK		
MW-35S	2	Flush-mount	Chemistry, Water level	OK	OK	OK	NA	OK	OK		
MW-36AQ	2	Flush-mount		OK	OK	OK	NA	OK	OK		
MW-36S	2	Flush-mount	Water level	OK	OK	OK	NA	OK	OK		
MW-37AQ	2	Flush-mount		OK	OK	OK	NA	OK	OK		
MW-37S	2	Flush-mount	Chemistry, Water level	OK	OK	OK	NA	OK	OK		
MW-53D	4	Flush-mount	Chemistry, Water level	OK	OK	OK	NA	OK	OK		
MW-53S	4	Flush-mount		OK	OK	OK	NA	OK	OK		
MW-101	2	Flush-mount	Chemistry, Water level	OK	OK	OK	NA	OK	OK		
MW-102	2	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		

First Quarter 2025 Semi-Annual Well Inspection Report

Monitoring Well	Diameter (in.)	Finish	Routine Monitoring Well	Well Condition (see notation types below)						Comments	Action Items
				Collar	Lid	Plug	Lock	Tag	Casing		
MW-103	2	Flush-mount	Chemistry, Water level	OK	OK	OK	NA	OK	OK		
MW-104	2	Flush-mount	Chemistry, Water level	OK	OK	OK	NA	OK	OK		
MW-105	2	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK	Lock replaced.	
MW-106	2	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-201	2	Stickup		OK	OK	OK	OK	X	OK		
MW-202D	2	Stickup		OK	OK	OK	OK	OK	OK		
MW-202S	2	Stickup		OK	OK	OK	OK	OK	OK		
MW-203	2	Stickup		OK	OK	OK	OK	OK	OK		
OW-6	2	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
OW-7	2	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
PZ-1	2	Stickup	Water level	OK	OK	OK	OK	OK	OK		
PZ-3	2	Flush-mount	Water level	OK	OK	OK	NA	OK	OK		
PZ-4	2	Stickup		OK	OK	OK	OK	OK	OK		
R-3D	10	Stickup		NA	NA	NA	NA	OK	OK		

First Quarter 2025 Semi-Annual Well Inspection Report

Monitoring Well	Diameter (in.)	Finish	Routine Monitoring Well	Well Condition (see notation types below)						Comments	Action Items
				Collar	Lid	Plug	Lock	Tag	Casing		
RW-1R	6	Vault	Chemistry, Water level	OK	OK	NA	NA	OK	OK		

Notes:

* Off-site Well

Condition Notation:

D: damaged

NA: not applicable

OK: acceptable condition

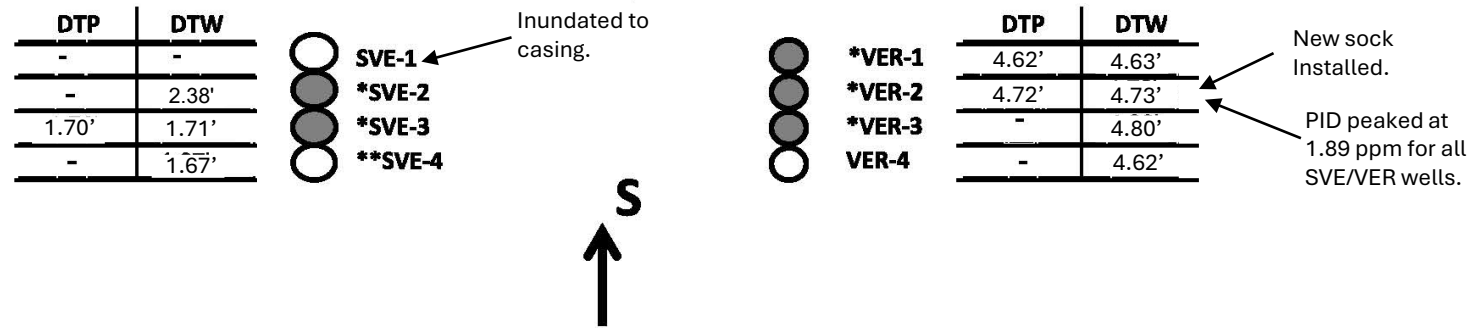
X: item missing

SVE/VER PRODUCT MEASUREMENT CHECKLIST

HARRIMAN, NEW YORK

Recorded By: Natalie Lynch, Emma Mauro

Date: 3/24/2025



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:
Graphic represents orientation of wells when facing south.
Check wells for depth to water (DTW) and depth to product (DTP) after absorbent sock is removed.
*Absorbent sock present in VER-1 through VER-2, SVE-2, and SVE-3 and prior observations of product have been noted in this well.
**Bottom of SVE-4 partially filled in during prior demolition work (Bottom at 2.65 ft).

Attachment 2

Streambank and Parking Lot Inspection Photographs and Log

RIVERBANK AND PARKING LOT INSPECTION FORM

HARRIMAN, NEW YORK

DATE: 3/24/2025

INSPECTION (Check): SEMI-ANNUAL

INSPECTOR: Natalie Lynch, Kelly Thigpen

QUARTERLY X

	STATUS	COMMENTS
A. General condition of riverbank cover material	<u>OK</u>	<u>Stable</u>
B. Settlement of riverbank cover	<u>OK</u>	<u>None observed</u>
C. General condition of parking lot cover material	<u>OK</u>	<u>10-15 small holes observed across the parking lot</u>
D. Settlement of parking lot cover	<u>OK</u>	<u>Recent repairs have settled</u>

Photograph 1
Representative Streambank Photograph



Photograph taken March 24, 2025

Photograph 2
Representative Streambank Photograph



Photograph taken March 24, 2025

Photograph 3
Representative Parking Lot Photograph Facing Southeast



Photograph taken March 24, 2025

Photograph 4
Representative Parking Lot Photograph Facing Northwest



Photograph taken March 24, 2025

Photograph 5
Representative Parking Lot Photograph Showing Areas of Repair



Photograph taken March 24, 2025

Photograph 6
Representative Parking Lot Photograph Showing Areas of Repair



Photograph taken March 24, 2025

Attachment 3

Area F and Building 53 Area Photographs and Log

FORMER DRUM EXCAVATION AREAS INSPECTION FORM

HARRIMAN, NEW YORK

DATE: 3/24/2025

INSPECTION (Check): SEMI-ANNUAL X

INSPECTOR: Natalie Lynch, Emma Mauro

QUARTERLY

	STATUS	COMMENTS
A. AREA F	<u>OK</u>	<u>No disturbance. Natural vegetation.</u>
B. BUILDING 53 AREA	<u>OK</u>	<u>No disturbance. Natural vegetation.</u>

Photograph 1
Former Drum Excavation Area Facing Southwest



Photograph taken March 24, 2025

Photograph 2
Former Drum Excavation Area Facing East



Photograph taken March 24, 2025

Attachment 4

Fence Inspection Photographs and Log

SITE FENCE INSPECTION FORM

HARRIMAN, NEW YORK

DATE: 3/24/2025

INSPECTION (Check): SEMI-ANNUAL X

INSPECTOR: Natalie Lynch, Kelly Thigpen

QUARTERLY _____

STATUS

COMMENTS

A. Perimeter Fence around NEPERA Facility	OK
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B. Perimeter fence around NEPERA Parking Lot	Damaged
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C. Perimeter fence around lagoon area OK

Five foot gap in fencing on N side of parking lot. Dense vegetation throughout

OK. Couldn't view a significant portion of fence due to excessive vegetation.

Photograph 1
Parking Lot Fence Facing Southwest



Photograph taken March 24, 2025

Photograph 2
Lot Fence facing Southeast



Photograph taken March 24, 2025

Photograph 3
Fence Facing South



Photograph taken March 24, 2025

Photograph 4
Fence Gate Facing North



Photograph taken March 24, 2025

Photograph 5
Fence Damage on North side of Parking Log



Photograph taken March 24, 2025

Photograph 6
Fence Damage on North side of Parking Log



Photograph taken March 24, 2025