

Memorandum

November 3, 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: Third 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 third 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). 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 September 17 and 18, 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. Concurrent site clearing 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 inner casing deficiencies, and two additional wells were observed to have outer casing or lid deficiencies. Additional well repairs were assessed during this inspection and will be implemented before the next groundwater monitoring event.

Former Soil Vapor Extraction Well In Situ Product Removal

The absorbent sock in soil vapor extraction (SVE) well VER-2 was observed to be at 30% capacity when inspected on September 18, 2025, and was replaced with two socks tied together to accommodate variation in water level. This absorbent sock was last replaced on March 24, 2025.

The absorbent socks present in four other wells (SVE-2, SVE-3, VER-1, and VER-3) were also inspected on September 18, 2025. Three of these absorbent socks had slight discoloration, although product was detected in only one of the wells (0.01 inch in VER-1). Because only approximately 30% of each of these socks was discolored, none were 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-3, 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 2024 inspection were patched and repaired in January 2025. There were many small, localized areas with limited subsidence of the asphalt; however, larger holes were also observed which would benefit from focused repairs to provide erosion protection for materials beneath the parking lot area. As done in the past, patching and repair of the areas in the parking lot requiring attention will be completed in the upcoming quarter pending weather conditions. 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 fencing on the north side of the parking lot, adjacent to the river, could not be observed due to dense vegetation. This portion of the fence was previously noted as damaged during the March 2025 inspection. Access is likely restricted due to the location and extent of vegetation present, but the site owner has been made aware and 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.

Summary of Second and Third Quarter 2025 Activities

The following is a summary of activities from the second and third quarters of 2025:

- The combined Q1 Site Inspection Report and 2025 Groundwater Monitoring Report was submitted to NYSDEC for review on July 17, 2025.
- NYSDEC requested additional figures to be included in the 2025 Groundwater Monitoring Report. Draft figures were approved by NYSDEC on October 2, 2025, and a revised report was submitted to NYSDEC on October 9, 2025.
- NYSDEC met with Anchor QEA and Brown and Caldwell to discuss project progress and site-wide feasibility study alternatives on August 27, 2025.
- Anchor QEA submitted a Proposed Work Plan for groundwater sampling and analysis for mercury on September 15, 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 September 17 and 18, 2025.
- Anchor QEA and the Corporate Defendants completed site clearing and grubbing to maintain site access September 15–19, 2025.
- The following site maintenance tasks were completed during the third quarter 2025 inspection:
 - Installed unbreakable chain on gate after chain was observed to have been cut

Projected Fourth Quarter 2025 and First Quarter 2026 Activities

The following activities are planned for the fourth quarter of 2025 and first quarter of 2026:

- Well repair and redevelopment of select wells scheduled for the week of October 13, 2025
- Groundwater sampling and analysis for mercury in fourth quarter 2025
- Meetings with NYSDEC with efforts towards finalizing the remedial alternatives and setting cleanup standards
- Fourth and first quarter site inspections with corresponding reports to NYSDEC

Attachments

- Attachment 1 Third 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

Third Quarter 2025 Semi-Annual Well
Inspection Report

Third Quarter 2025 Semi-Annual Well Inspection Report

Monitoring Well	Diameter (inches)	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. Assessed by ADT for well casing issues	Plug well casing, dig out around standpipe, move over to realign with casing, repair coupling

Third Quarter 2025 Semi-Annual Well Inspection Report

Monitoring Well	Diameter (inches)	Finish	Routine Monitoring Well	Well Condition (see notation types below)						Comments	Action Items
				Collar	Lid	Plug	Lock	Tag	Casing		
MW-3S	4	Stickup	Water level	OK	OK	OK	OK	OK	OK		
MW-4S	4	Stickup	Water level	OK	OK	OK	OK	OK	OK		
MW-5S	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-6D	4	Stickup	Chemistry, Water level	OK	OK	NA	OK	OK	NA		
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	OK	OK	OK	OK	OK		
MW-10D	6	Stickup		OK	OK	X	X	X	X	Tubing is tied off inside well. Locking loop is broken off. Assessed by ADT for well casing issues	Use chisel and hammer to flatten standpipe lock mechanism to be able to lock well
MW-11S	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK	Relabeled with paint pen	
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	Assessed by ADT for redevelopment	

Third Quarter 2025 Semi-Annual Well Inspection Report

Monitoring Well	Diameter (inches)	Finish	Routine Monitoring Well	Well Condition (see notation types below)						Comments	Action Items
				Collar	Lid	Plug	Lock	Tag	Casing		
MW-17S	4	Stickup		OK	OK	OK	OK	OK	D	PVC casing broken off ~2 inches within metal casing. Assessed by ADT for well casing issues	Plug well casing, dig out around standpipe, move over to realign with casing, repair coupling
MW-18D	6	Stickup		D	OK	X	NA	OK	X	Assessed by ADT for well casing issues	Replace lid
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		

Third Quarter 2025 Semi-Annual Well Inspection Report

Monitoring Well	Diameter (inches)	Finish	Routine Monitoring Well	Well Condition (see notation types below)						Comments	Action Items
				Collar	Lid	Plug	Lock	Tag	Casing		
MW-26D	2	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK	Assessed by ADT for redevelopment	
MW-26S	4	Stickup		OK	OK	OK	OK	OK	OK		
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	Relabeled with paint pen. ADT assessed for redevelopment	
MW-29S	2	Stickup		OK	OK	OK	OK	OK	OK		
MW-33S	2	Flush-mount	Chemistry, Water level	OK	OK	OK	OK	NA	OK	Inundated	
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	Inundated	
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		

Third Quarter 2025 Semi-Annual Well Inspection Report

Monitoring Well	Diameter (inches)	Finish	Routine Monitoring Well	Well Condition (see notation types below)						Comments	Action Items
				Collar	Lid	Plug	Lock	Tag	Casing		
MW-53S	4	Flush-mount		OK	OK	OK	NA	OK	OK	Inundated	
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		
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		Relabel
MW-105	2	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-106	2	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-201	2	Stickup		OK	OK	OK	OK	OK	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		

Third Quarter 2025 Semi-Annual Well Inspection Report

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

Notes:

* Off-site Well

PVC: polyvinyl chloride

Condition Notation:

D: damaged

NA: not applicable

OK: acceptable condition

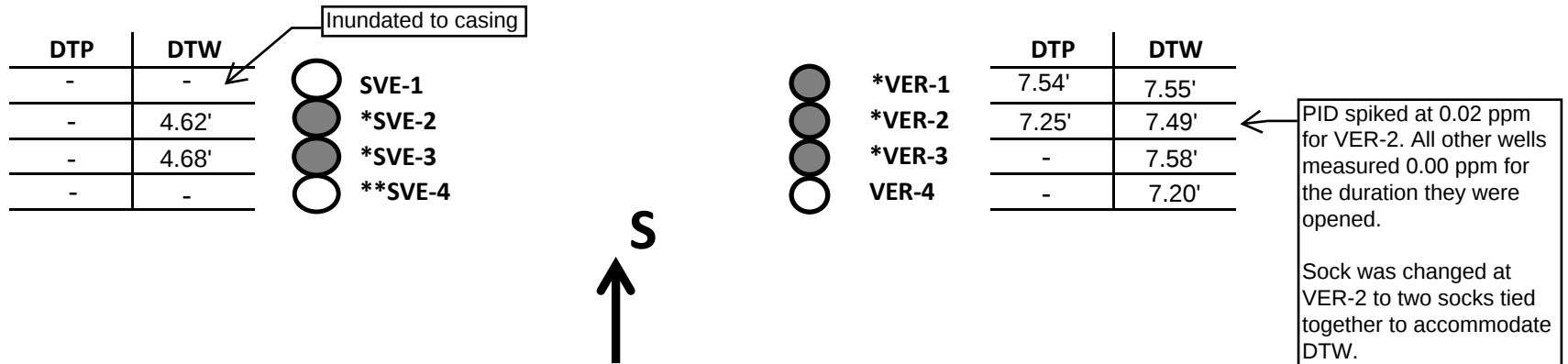
X: item missing

SVE/VER PRODUCT MEASUREMENT CHECKLIST

HARRIMAN, NEW YORK

Recorded By: Natalie Lynch

Date: 9/18/25



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-3, SVE-2, and SVE-3 and prior observations of product have been noted in these wells.

**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: 9/17/25

INSPECTION (Check): SEMI-ANNUAL

INSPECTOR: Natalie Lynch

QUARTERLY X

	STATUS	COMMENTS
A. General condition of riverbank cover material	<u>OK</u>	<u>Stable, dense vegetation</u>
B. Settlement of riverbank cover	<u>OK</u>	<u>None observed</u>
C. General condition of parking lot cover material	<u>Poor</u>	<u>Three large holes (>12"), 17 medium holes (6-12"), 36 small holes (<6")</u>
D. Settlement of parking lot cover	<u>OK</u>	<u>Recent repairs have settled</u>

Photograph 1
Representative Streambank Photograph



Photograph taken September 17, 2025

Photograph 2
Representative Streambank Photograph



Photograph taken September 17, 2025

Photograph 3
Representative Parking Lot Photograph Facing Southeast



Photograph taken September 17, 2025

Photograph 4
Representative Parking Lot Photograph Facing Northwest



Photograph taken September 17, 2025

Photograph 5
Representative Parking Lot Photograph Showing Areas of Repair



Photograph taken September 17, 2025

Photograph 6
Representative Parking Lot Photograph Showing Areas of Repair



Photograph taken September 17, 2025

Attachment 3

Area F and Building 53 Area Photographs and Log

FORMER DRUM EXCAVATION AREAS INSPECTION FORM

HARRIMAN, NEW YORK

DATE: 9/17/25

INSPECTION (Check): **SEMI-ANNUAL** X

INSPECTOR: Natalie Lynch

QUARTERLY

STATUS

COMMENTS

A. AREA F

OK

No disturbance. Natural vegetation. Recently cleared.

B. BUILDING 53 AREA

OK

No disturbance. Natural vegetation. Recently cleared.

Photograph 1
Former Drum Excavation Area Facing Southwest



Photograph taken September 18, 2025

Photograph 2
Former Drum Excavation Area Facing East



Photograph taken September 18, 2025

Attachment 4

Fence Inspection Photographs and Log

SITE FENCE INSPECTION FORM

HARRIMAN, NEW YORK

DATE: 9/17/25

INSPECTION (Check): SEMI-ANNUAL X

INSPECTOR: Natalie Lynch

QUARTERLY _____

STATUS

COMMENTS

A. Perimeter Fence around NEPERA Facility OK

Five foot gap in fenceing on N side of parking lot. Unable to view due to dense vegetation.

B. Perimeter fence around NEPERA Parking Lot	<u>Damaged</u>
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C. Perimeter fence around lagoon area	Damaged
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Two holes in fence - not at site perimeter

Photograph 1
Parking Lot Fence Facing Southwest



Photograph taken September 17, 2025

Photograph 2
Lot Fence facing Southeast



Photograph taken September 17, 2025

Photograph 3
Fence Facing South



Photograph taken September 17, 2025

Photograph 4
Fence Gate Facing North



Photograph taken September 17, 2025

Photograph 5
Fence Damage on North side of Parking Log



Photograph taken September 17, 2025