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ANCHOR QEA

Memorandum

April 22, 2026

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; Sarah LaRoe and Natalie Lynch, Anchor QEA

Re: First Quarter 2026 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 2026 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 March 20, 2026, 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. Site clearing completed in Fall 2025 has allowed increased access to wells that were previously difficult to access.

Maintenance was completed at six wells in October 2025. Wells MW-2S and MW-17S had their standpipes realigned. Wells MW-2S, MW-16S, MW-28S, and MW-18D were redeveloped, and a standpipe cover was placed over the original standpipe at well MW-10D.

The components of all 76 monitoring wells remain in satisfactory condition, with exceptions noted in the monitoring well summary forms in Attachment 1. One well, MW-12S, was observed to be missing its lid. After searching the area, it could not be found. The lid will be replaced before the next routine

groundwater monitoring event, which will likely be in June 2026. Several wells were re-labeled with a paint pen. No other major issues were observed with any other wells.

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 80% capacity when inspected on March 20, 2026 and was replaced with two socks tied together to accommodate variation in water level. This absorbent sock was last replaced on September 18, 2025.

The absorbent socks present in four other wells (SVE-2, SVE-3, VER-1, and VER-3) were also inspected on March 20, 2026. Three of these absorbent socks had slight discoloration, although product was not detected in any of the wells. Because only approximately up to 40% of each of these socks was discolored, none were replaced. No product was observed in wells SVE-1, SVE-2, SVE-3, SVE-4, VER-1, 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 2025 inspection were patched and repaired in December 2025. While there are small, localized areas with limited subsidence, immediate repair is not necessary at this time. 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 previous site inspections, the fencing on the north side of the parking lot, adjacent to the river, indicated one area with some damage (See Attachment 4). The site owner

has been made aware and repairs can be made if necessary given the limited access to this area and presence of the guard rail. The section of the fence adjacent to the parking lot with the previous truck damage repaired on March 26, 2024 was observed to be in good condition. Additional photographs and inspection forms are provided in Attachment 4.

Summary of Fourth Quarter 2025 and First Quarter 2026 Activities

The following is a summary of activities from the fourth quarter of 2025 and the first quarter of 2026:

- The Q3 Site Inspection Report was submitted to NYSDEC on November 3, 2025.
- Well repair and redevelopment of select wells was completed October 13th and 14th, 2025.
- Anchor QEA submitted a revised work plan for groundwater sampling and analysis for mercury on November 3, 2025. It was approved on November 17, 2025.
- Anchor QEA completed the groundwater sampling event November 17-21, 2025.
- The Q4 Site Inspection was completed on November 21, 2025.
- Parking lot repairs were completed by ELT Harriman – December 2025
- The Mercury Speciation Technical Memorandum for the Nepera Harriman Site was submitted to NYSDEC on February 20, 2026. This document contained two attachments: the Parking Lot Data Gap Study Report and the Supplemental Groundwater Mercury Sampling Data Summary Report. This submittal was approved on March 26, 2026.
- 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 20, 2026.
- The draft lists of Feasibility Study Alternatives for Area 1 (Parking Lot), Area 2 (Lagoon and Floodplain) ,and Area 3 (Main Plant Site) were submitted to NYSDEC on April 7, 2026.

Projected Second and Third Quarter 2026 Activities

The following activities are planned for second and third Quarter 2026:

- A site walk with NYSDEC, Anchor QEA, and Brown and Caldwell is scheduled for April 28, 2026.
- Routine groundwater monitoring for the ISMP will take place in Q2 2026, likely in June, followed by submittal of a Groundwater Monitoring Report.
- Second and third quarter site inspections with corresponding reports to NYSDEC.

Attachments

Attachment 1 First Quarter 2026 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 2026 Semi-Annual Well Inspection Report

First Quarter 2026 Semi-Annual Well Inspection Report

Monitoring Well	Diam (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	OK	OK	OK	N/A	OK	N/A	Re-labeled with paint pen	
MW-2S	4	Stickup	Water level	OK	OK	OK	OK	OK	OK		
MW-3S	4	Stickup	Water level	OK	OK	OK	N/A	OK	OK		
MW-4S	4	Stickup	Water level	OK	OK	OK	OK	OK	OK	Dedicated tubing inside	
MW-5S	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-6D	4	Stickup	Chemistry, Water level	OK	OK	N/A	OK	OK	N/A		
MW-7S	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		

First Quarter 2026 Semi-Annual Well Inspection Report

Monitoring Well	Diam (In)	Finish	Monitoring Well	Collar	Lid	Plug	Lock	Tag	Casing	Comments	Action Items
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	Collar rusty/Difficult to remove.	
MW-10D	6	Stickup		OK	OK	OK	X	OK	OK	Dedicated tubing inside. Lock beginning to corrode.	Replace lock
MW-11S	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-12S	2	Flush-mount	Chemistry, Water level	OK	X	OK	N/A	OK	OK	Lid missing from well.	Replace lid
MW-13S	2	Flush-mount	Water level	OK	OK	OK	N/A	OK	OK	Inundated, but casing plug in place	
MW-16S	4	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-17S	4	Stickup		OK	OK	OK	OK	OK	OK		
MW-18D	6	Stickup		OK	OK	N/A	OK	OK	N/A		
MW-20D	4	Flush-mount	Chemistry, Water level	N/A	OK	OK	N/A	OK	OK	Inundated, but casing plug in place	
MW-20DR	2	Flush-mount	Chemistry, Water level	N/A	OK	OK	N/A	OK	OK	Inundated, but casing plug in place	
MW-20S	4	Flush-mount	Chemistry, Water level	N/A	OK	OK	N/A	OK	OK	Inundated, but casing plug in place	
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		

First Quarter 2026 Semi-Annual Well Inspection Report

Monitoring Well	Diam (In)	Finish	Monitoring Well	Collar	Lid	Plug	Lock	Tag	Casing	Comments	Action Items
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		
MW-27D	6	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK	Re-labeled with paint pen	
MW-27S	4	Stickup	Water level	OK	OK	OK	OK	OK	OK	Re-labeled with paint pen	
MW-28S	2	Stickup		OK	OK	OK	OK	OK	OK		
MW-29S	2	Stickup		OK	OK	OK	OK	OK	OK	Re-labeled with paint pen	
MW-33S	2	Flush-mount	Chemistry, Water level	N/A	OK	OK	N/A	OK	OK	Inundated, but casing plug in place	
MW-34	2	Flush-mount		N/A	OK	OK	N/A	OK	OK	Inundated, but casing plug in place	
MW-35AQ	2	Flush-mount		N/A	OK	OK	N/A	OK	OK		
MW-35S	2	Flush-mount	Chemistry, Water level	N/A	OK	OK	N/A	OK	OK		
MW-36AQ	2	Flush-mount		N/A	OK	OK	N/A	OK	OK		
MW-36S	2	Flush-mount	Water level	N/A	OK	OK	N/A	OK	OK	Inundated, but casing plug in place	
MW-37AQ	2	Flush-mount		N/A	OK	OK	N/A	OK	OK	Inundated, but casing plug in place	

First Quarter 2026 Semi-Annual Well Inspection Report

Monitoring Well	Diam (In)	Finish	Monitoring Well	Collar	Lid	Plug	Lock	Tag	Casing	Comments	Action Items
MW-37S	2	Flush-mount	Chemistry, Water level	N/A	OK	OK	N/A	OK	OK	Inundated, but casing plug in place	
MW-53D	4	Flush-mount	Chemistry, Water level	N/A	OK	OK	N/A	OK	OK		
MW-53S	4	Flush-mount		N/A	OK	OK	N/A	OK	OK	Inundated, but casing plug in place	
MW-101	2	Flush-mount	Chemistry, Water level	N/A	OK	OK	N/A	OK	OK	Inundated, but casing plug in place	
MW-102	2	Stickup	Chemistry, Water level	OK	OK	OK	OK	OK	OK		
MW-103	2	Flush-mount	Chemistry, Water level	N/A	OK	OK	N/A	OK	OK	Inundated, but casing plug in place	
MW-104	2	Flush-mount	Chemistry, Water level	N/A	OK	OK	N/A	OK	OK	Inundated, but casing plug in place, re-labeled with paint pen	
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		

First Quarter 2026 Semi-Annual Well Inspection Report

Monitoring Well	Diam (In)	Finish	Monitoring Well	Collar	Lid	Plug	Lock	Tag	Casing	Comments	Action Items
PZ-3	2	Flush-mount	Water level	N/A	OK	OK	N/A	OK	OK		
PZ-4	2	Stickup		OK	OK	OK	OK	OK	OK		
R-3D	10	Stickup		N/A	N/A	N/A	N/A	OK	OK		
RW-1R	6	Vault	Chemistry, Water level	OK	N/A	N/A	N/A	OK	OK	Re-labeled with paint pen	

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: Emma Mauro **Date:** March 20, 2026

DTP	DTW	
--	0.13'	SVE-1
--	2.0'	*SVE-2
--	1.32'	*SVE-3
--	1.35'	**SVE-4

	DTP	DTW
*VER-1	--	3.04'
*VER-2	4.08	4.22'
*VER-3	--	2.96'
VER-4	--	2.56'

PID spiked at 2.46 ppm for VER-2. All other wells measured no more than 0.2 ppm for the duration they were opened.

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: March 20, 2026

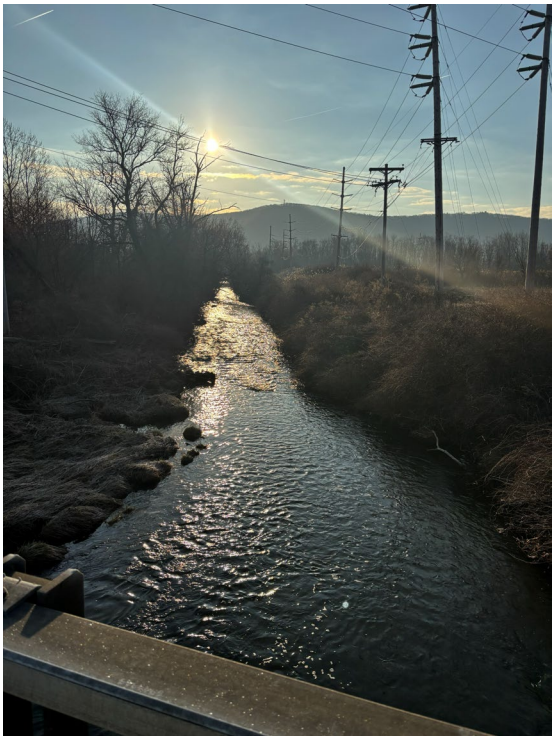
INSPECTOR: Emma Mauro

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

QUARTERLY

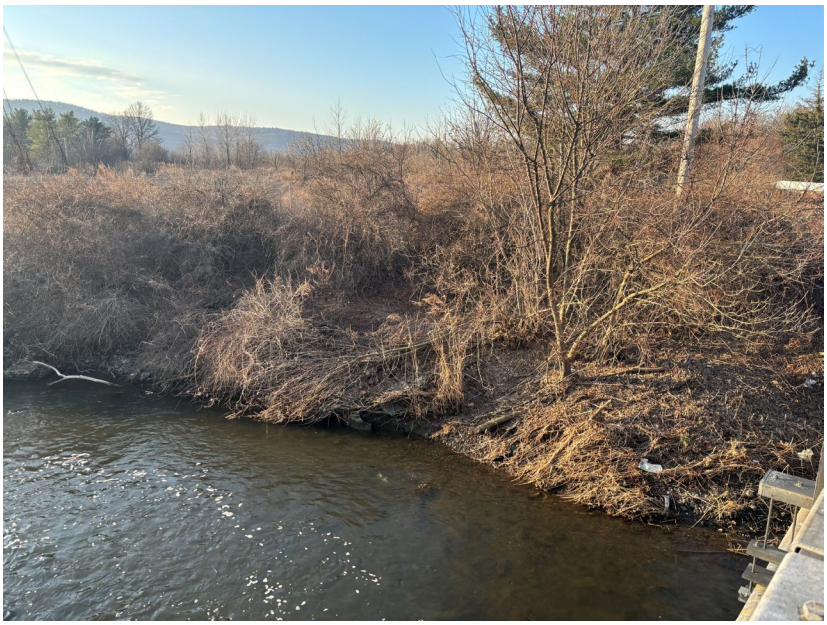
	STATUS	COMMENTS
A. General condition of riverbank cover material	OK	Stable, dense vegetation
B. Settlement of riverbank cover	OK	None observed
C. General condition of parking lot cover material	OK	Some limited settling from recent repairs
D. Settlement of parking lot cover	OK	Some settling

Photograph 1
Representative Streambank Photograph



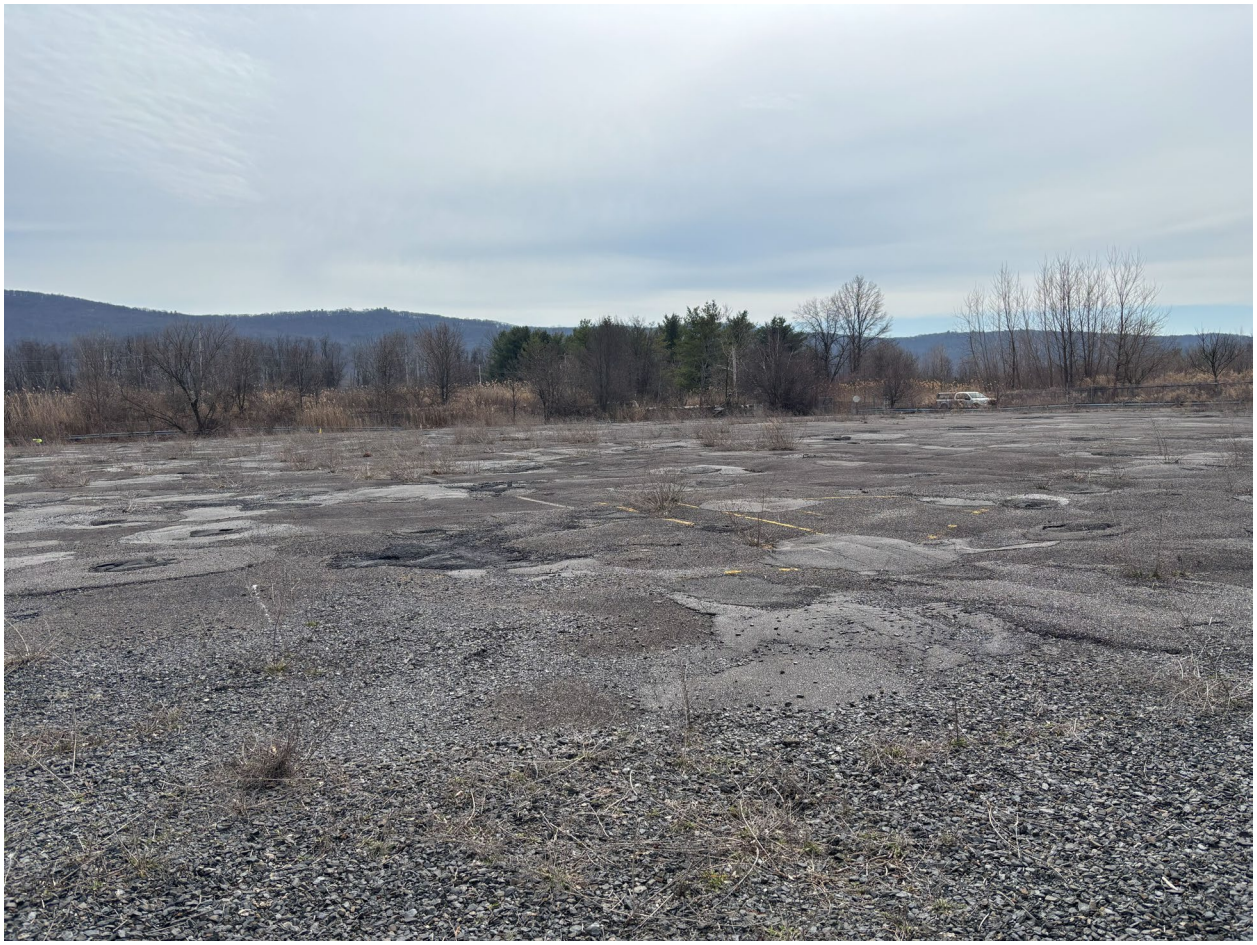
Photograph taken March 20, 2026

Photograph 2
Representative Streambank Photograph



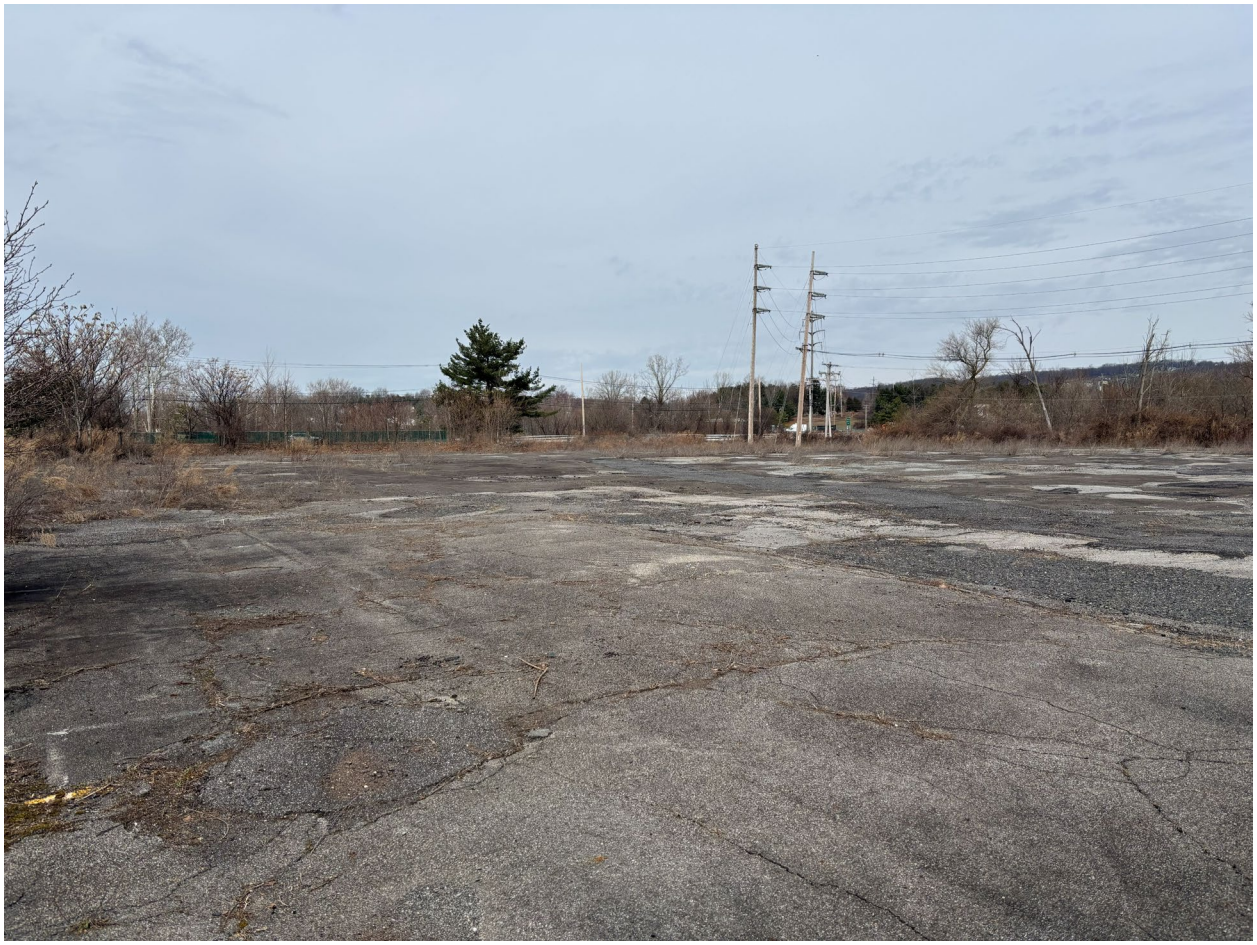
Photograph taken March 20, 2026

Photograph 3
Representative Parking Lot Photograph Facing Southeast



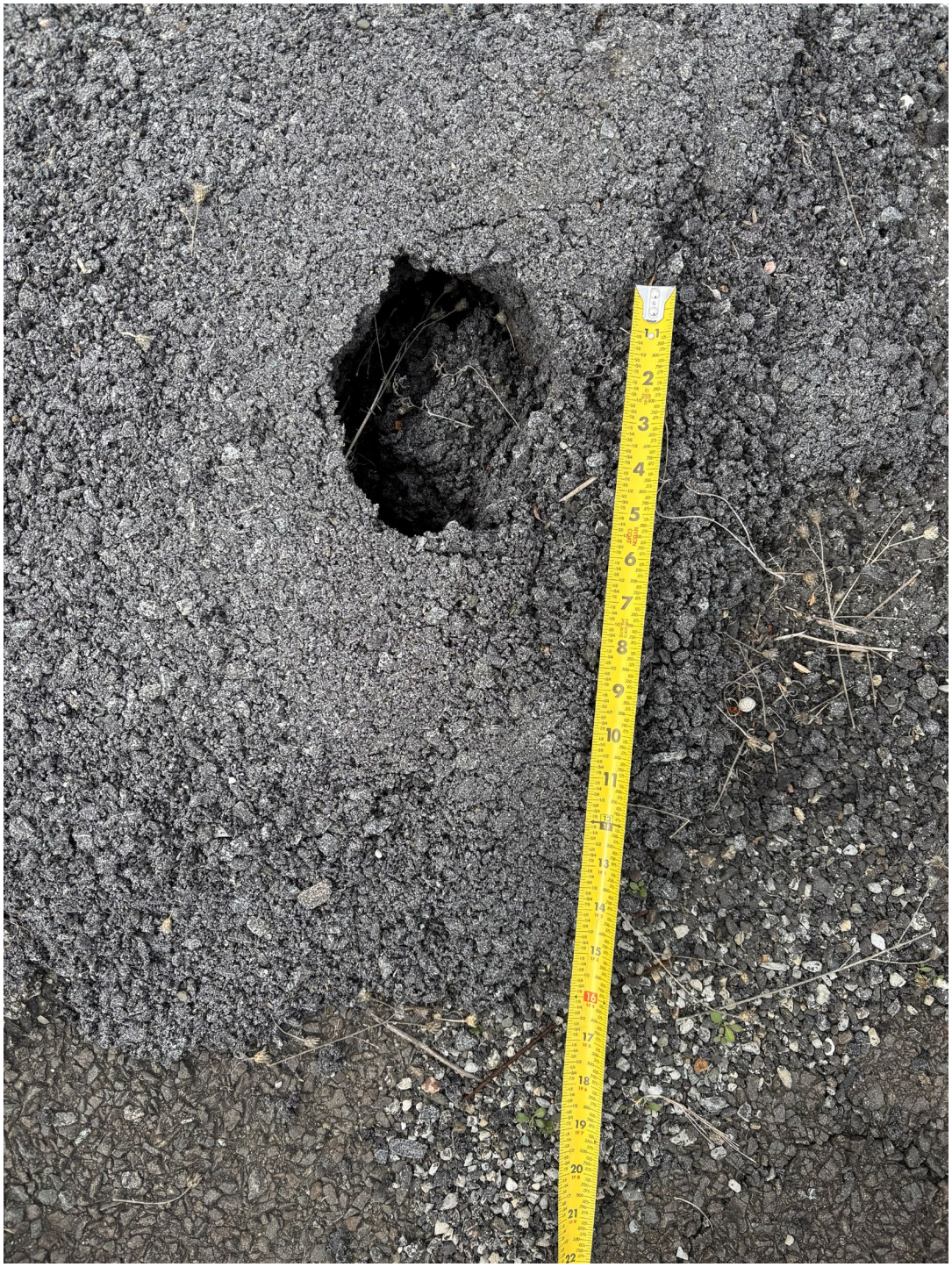
Photograph taken March 20, 2026

Photograph 4
Representative Parking Lot Photograph Facing Northwest



Photograph taken March 20, 2026

Photograph 5
Representative Parking Lot Photograph Showing Small Hole



Photograph taken March 20, 2026

Attachment 3
Area F and Building 53 Area Photographs and Log

FORMER DRUM EXCAVATION AREAS INSPECTION FORM

HARRIMAN, NEW YORK

DATE: March 20, 2026

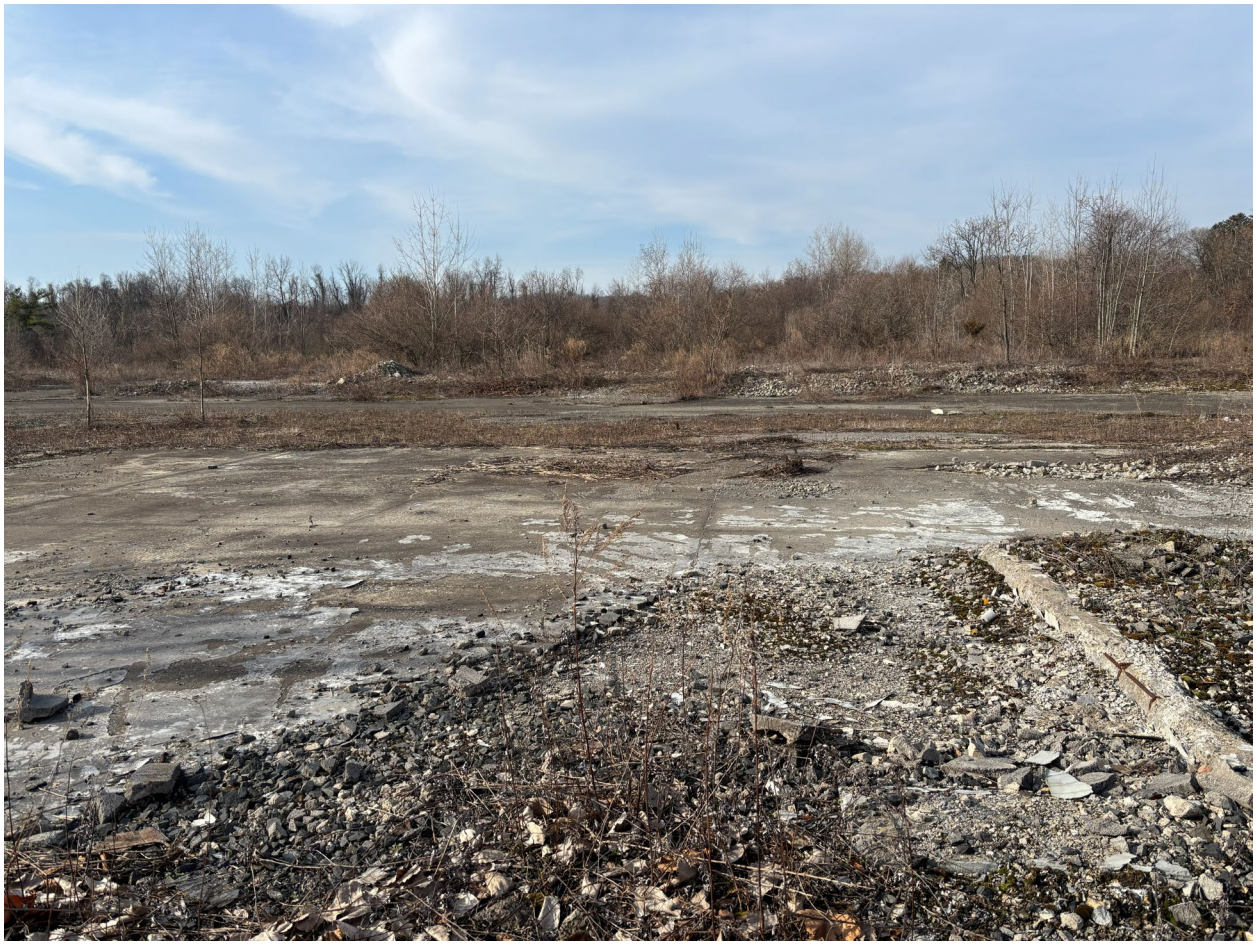
INSPECTION (Check): **SEMI-ANNUAL** x

INSPECTOR: Emma Mauro

QUARTERLY

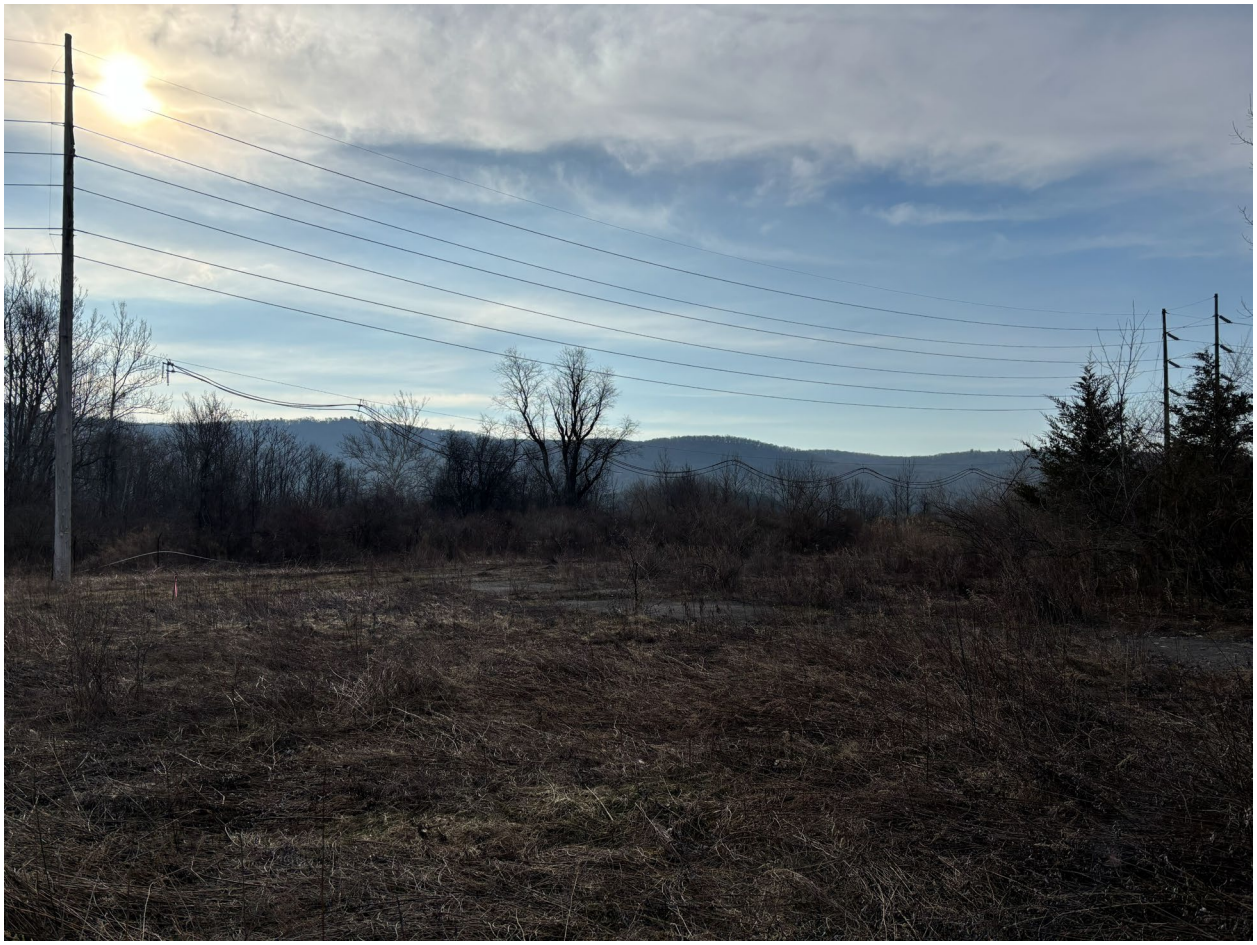
	STATUS	COMMENTS
A. AREA F	OK	No disturbance, natural vegetation
B. BUILDING 53 AREA	OK	No disturbance, natural vegetation

Photograph 1
Former Drum Excavation Area Facing Southwest



Photograph taken March 20, 2026

Photograph 2
Former Drum Excavation Area Facing East



Photograph taken March 20, 2026

Attachment 4
Fence Inspection Photographs and Log

SITE FENCE INSPECTION FORM

HARRIMAN, NEW YORK

DATE: March 20, 2026

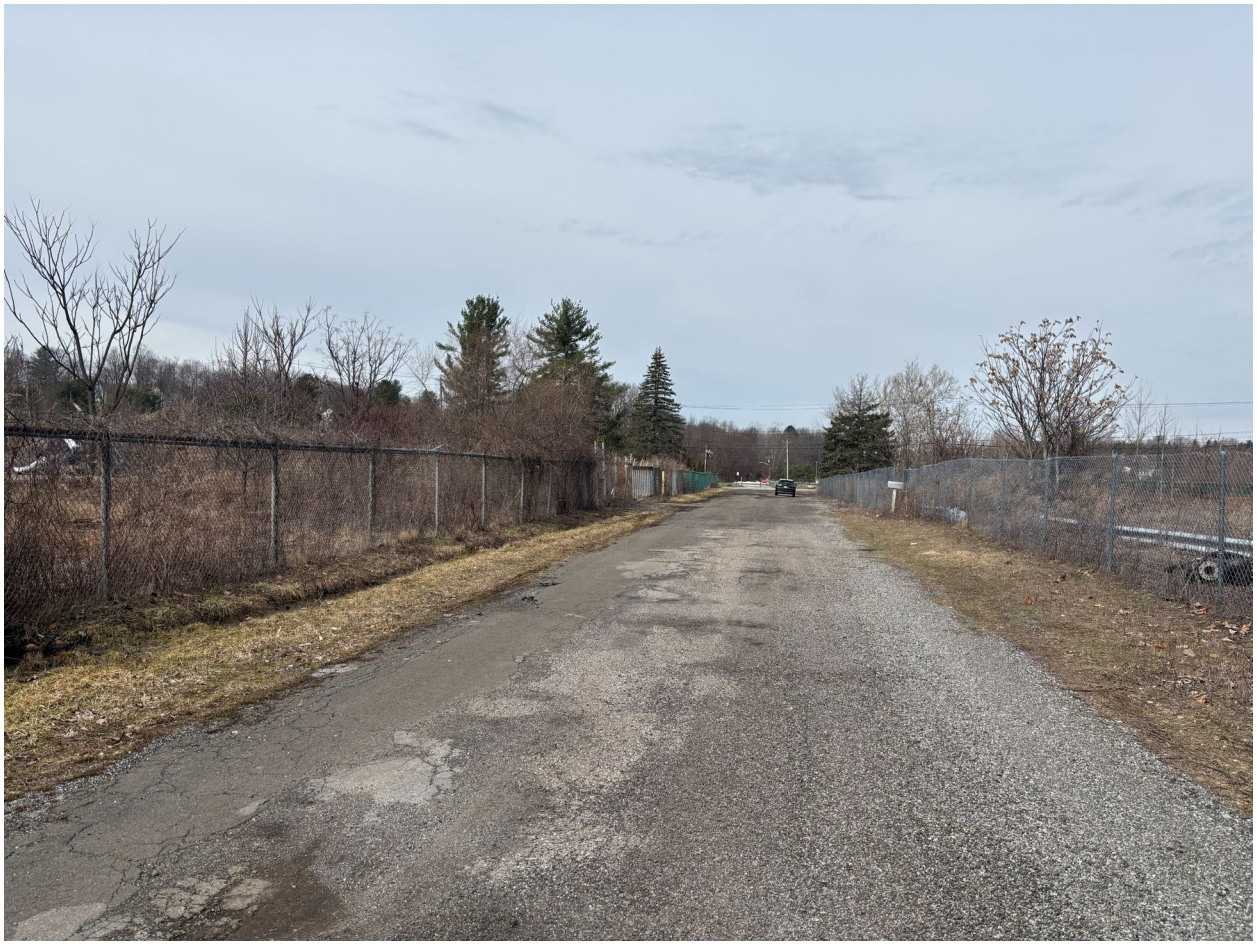
INSPECTOR: Emma Mauro

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

QUARTERLY

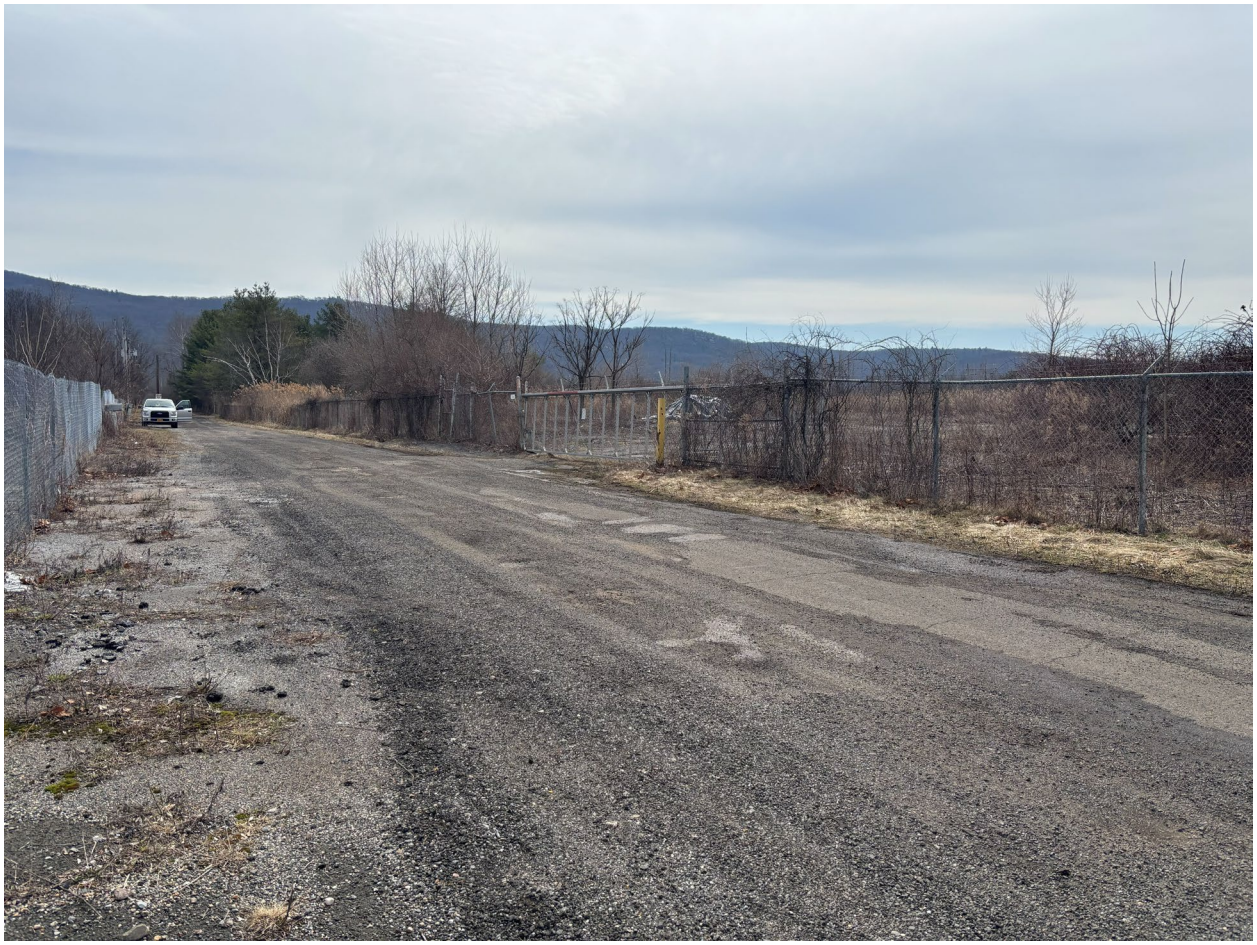
	STATUS	COMMENTS
A. Perimeter Fence around NEPERA Facility	OK	
B. Perimeter fence around NEPERA Parking Lot	Partially Damaged	Five foot gap in fencing on N side of parking lot near telephone pole
C. Perimeter fence around lagoon area	OK	Two holes in fence, not on perimeter

Photograph 1
Parking Lot Fence Facing Southwest



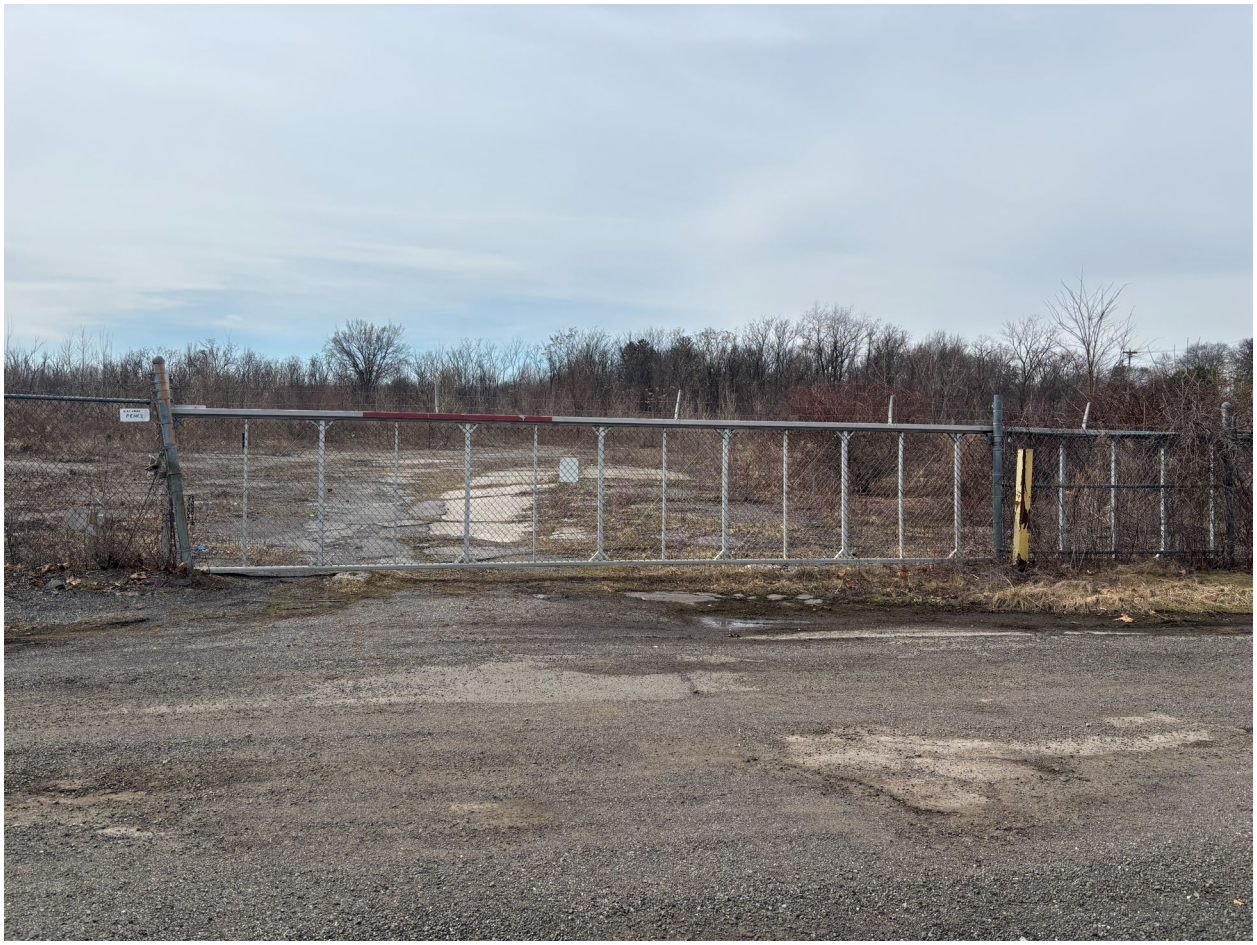
Photograph taken March 20, 2026

Photograph 2
Lot Fence facing Southeast



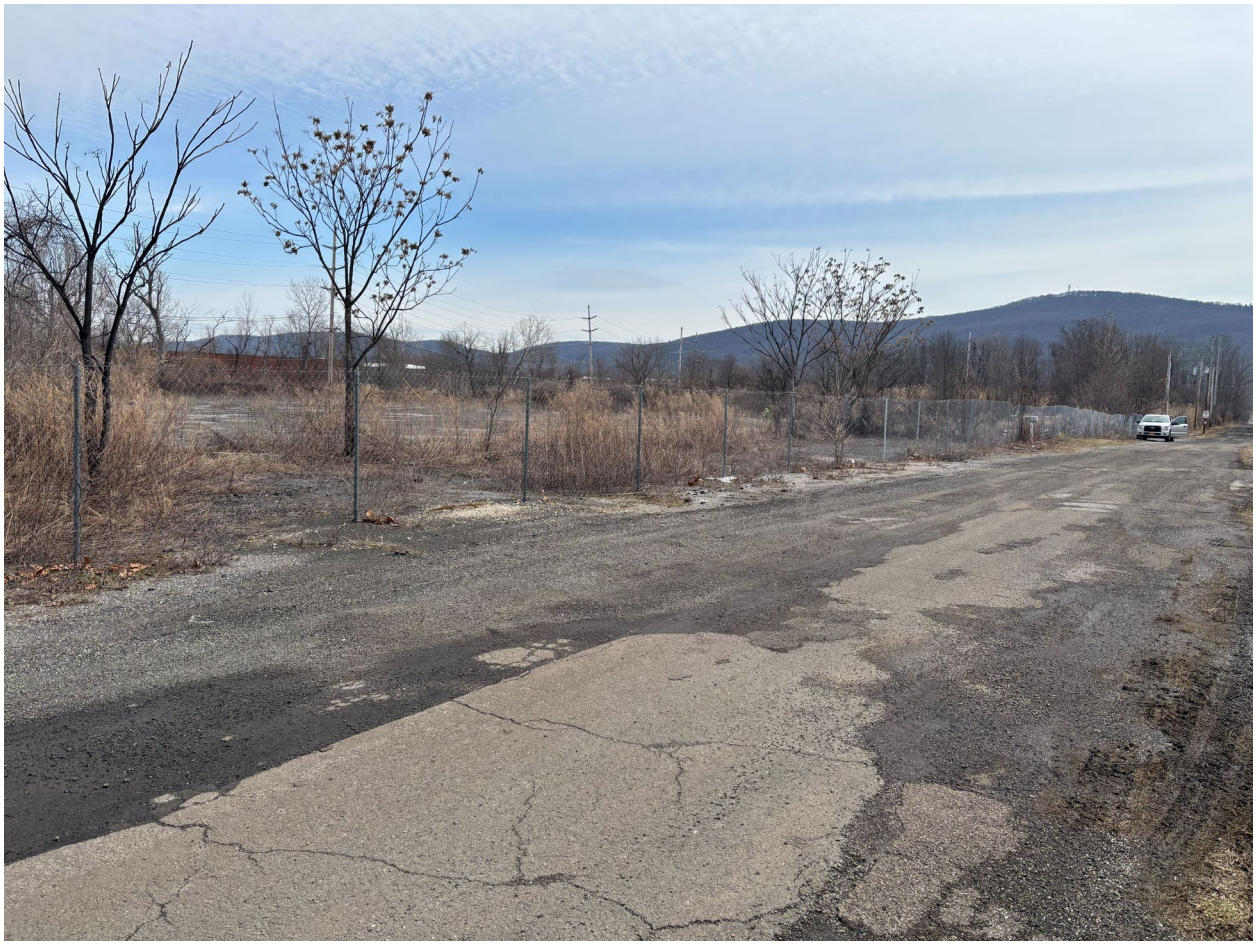
Photograph taken March 20, 2026

Photograph 3
Fence Facing South



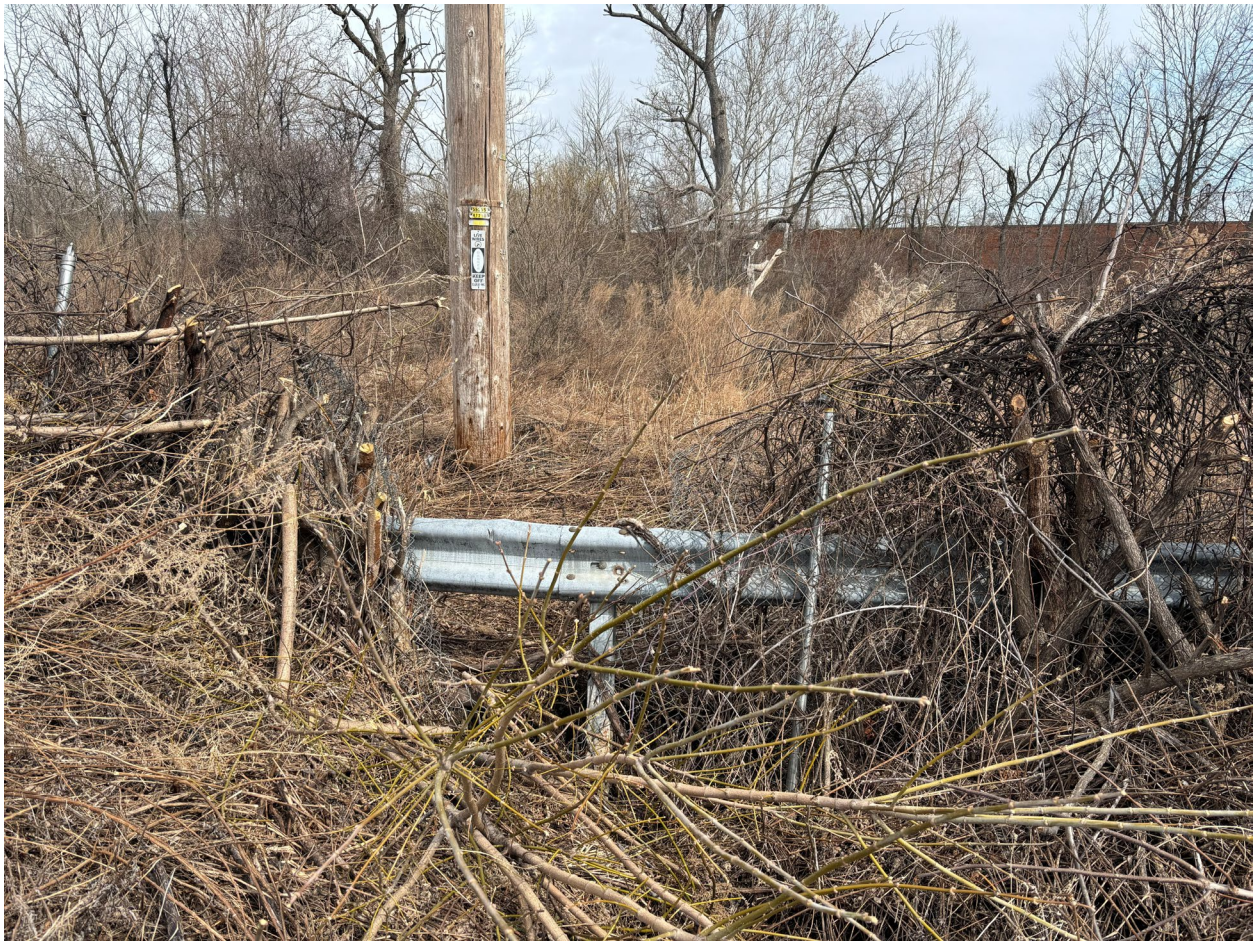
Photograph taken March 20, 2026

Photograph 4
Fence Gate Facing North



Photograph taken March 20, 2026

Photograph 5
Fence Damage on North side of Parking Log



Photograph taken March 20, 2026