

Forensic Environmental Services, Inc.

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The Commons at Lincoln Center
Exton, Pennsylvania 19341

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May 3, 2022

Daniel McNally
NYS Dept. of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau B, 625 Broadway, 12th Floor
Albany, NY 12233-7016

**RE: Quarterly Progress Report on Project Activities (First Quarter 2022)
Former Norton/Nashua Tape Products Facility
(January 1 through March 31, 2022)
2600 Seventh Avenue, Watervliet, New York
NYSDEC Order on Consent Index No. CO: 4-20001205-3375 (amended on January
10, 2019)**

Dear Mr. McNally:

In accordance with the August 2019 *Site Management Plan (SMP)*, Forensic Environmental Services, Inc. (FES), on behalf of Saint-Gobain Corporation (SGC), submits this Quarterly Progress Report for ongoing project activities at the Former Norton/Nashua Tape Products Facility in Watervliet, New York. Activities performed during the reporting period (January 1 through March 31, 2022) included: 1) submittal of the annual (2021) Hazardous Waste Report; 2) submittal of the Periodic Review Report (PRR); and 3) coordination of contractors for the upcoming In-Situ Chemical Oxidation (ISCO), Enhanced Fluid Recovery (EFR), and associated sampling activities. In addition, a report summarizing the Fourth Quarter 2021 site activities was submitted to the NYSDEC on January 27, 2022. The current project implementation schedule is presented in Table 1.

2021 Annual Hazardous Waste Report

The *2021 Annual Hazardous Waste Report* documenting the waste removal activities conducted during the November and December 2021 Enhanced Fluid Recovery (EFR) events was submitted electronically via the EPA's RCRAInfo website on February 9, 2022 (See Attachment 1). The next annual report documenting the 2022 EFR activities tentatively scheduled for October and November 2022 will be submitted in February 2023.

Submittal of the Initial Periodic Review Report (PRR)

The initial *Periodic Review Report (PRR)* was submitted to the NYSDEC on February 15, 2022. The *PRR* documented the repaving of the Environmental Easement area north of Building #61 in November 2021 and also included an evaluation of the corrective measures implemented subsequent to the issuance of the *Statement of Basis* in May 2017. The next *PRR* will be submitted to the NYSDEC in February 2023.

Upcoming Activities

Per the March 2017 *Statement of Basis* and the approved *Site Management Plan (SMP)*, proposed activities at the site for 2022 include: 1) an ISCO treatment event (including associated groundwater and vapor intrusion sampling); 2) continued bio-supplementation activities 3) two EFR events; 4) semi-annual groundwater monitoring (including an expanded off-site event); and 5) an annual Engineering Control (cap) inspection. Additional details on proposed activities for 2022 are presented below. The current project implementation schedule is presented in Table 1.

ISCO Injection Activities

In accordance with the NYSDEC-approved *SMP*, ISCO injection/treatment activities will be conducted in areas of the site exhibiting elevated toluene concentrations (see Figure 1). Based on the October 2021 groundwater sampling results, ISCO areas include: 1) Building #58 proximal to monitoring well MP-37; and 2) along the north wall of Building #61 (proximal to monitoring wells MP-24 through MP-27). The toluene concentration in monitoring well MW-27 in October 2021 decreased to 80 micrograms per liter ($\mu\text{g/L}$); therefore, neither EFR nor ISCO are currently proposed for this area. However, if toluene concentrations in MW-27 increase above 10,000 $\mu\text{g/L}$, EFR will be conducted and ISCO will be evaluated. The next groundwater sampling event is tentatively scheduled for April 2022 and ISCO activities are tentatively scheduled for June 6 – 17, 2022. The installation of the pre-ISCO injection soil borings is scheduled for June 1 – 3, 2022.

Groundwater Bio-Supplementation

Bio-supplementation activities will be conducted during all scheduled site visits in 2022. However, activities will be suspended for approximately 8 to 10 weeks following the June 2022 ISCO activities in areas where ISCO was conducted (see Figure 1). Monitoring wells exhibiting nitrate concentrations less than 1 parts per million (ppm) and/or phosphate concentrations less than 0.5 ppm will be dosed with approximately 100-200 grams of potassium nitrate and/or a phosphate solution (diluted 12% phosphate Miracle-Gro®, or similar product) dissolved in several gallons of potable-grade water as necessary. Field readings and associated well dosing activities (if necessary) will be conducted prior and subsequent to EFR activities (see below).

Enhanced Fluid Recovery (EFR) Activities

EFR events will be conducted during the Fourth Quarter 2022 and, based on previous sampling results, will likely include monitoring wells MP-25, MP-26, MP-27, MP-29, MP-37, and MW-28, which exhibited dissolved toluene concentrations above 10,000 $\mu\text{g/L}$ in October 2021 (see Figure 2). EFR wells and estimated extraction times will be based on the results of the post-ISCO sampling events tentatively scheduled for July and August 2022. In addition, all accessible groundwater monitoring wells within/proximal to the EFR locations will be gauged with an oil-water interface probe capable of detecting light non-aqueous phase liquid (LNAPL).

Groundwater Sampling Activities

Groundwater sampling activities for 2022 will be conducted in accordance with the *SMP*, and will include: 1) on-site ISCO/EFR/EB monitoring wells MP-24, MP-25, MP-26, MP-27, MP-29, MP-37, MW-22, MW-27, and MW-28; 2) on-site (semi-annual) monitoring wells MW-12, MW-15R, and MP-39; and 3) off-site (annual) monitoring wells MP-6, MP-14, MP-17, MP-19, MP-22, MW-18, and MW-19 (see Figures 3 and 4).

If you have any questions or comments regarding the information provided in this letter, please contact me or Thomas Maguire at (610) 594-3940.

Sincerely,

FORENSIC ENVIRONMENTAL SERVICES, INC.



Bryan J. Machella
Senior Project Manager

cc: Chris Angier, SGC
Ravi Korlipara, P.E., Korlipara Engineering
Silje Roalsvik, Resolute Management, Inc.
Jennifer Galoski, Resolute Management, Inc.
Brian K. Helf, Cloverleaf Distribution, LLC
Pete Popovics, Cenveo, Inc.
Thomas S. West, Esq., The West Firm, PLLC
Steve N. Siegel, Esq., The Siegel Law Firm, LLC
Rick Bethel, Tyco International
Jeffrey Danko, Tyco International
J. Hall, Esq., Berry Plastics Corporation
Gerard Burke, NYSDEC
Scarlett McLaughlin, NYSDOH
Sara Bogardus, NYSDOH
Jean Robert Jean, USEPA

TABLES

Table 1
Tentative Schedule
Former Norton/Nashua Tape Facility
Watervliet, New York

Activity	1Q2022			2Q2022			3Q2022			4Q2022		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Bio-Supplementation/Well Dosing Events												
On-Site (Semi-Annual) Groundwater Sampling Events												
Installation of Pre-In-Situ Chemical Oxidation (ISCO) Injection Points												
ISCO Activities (including Vapor Intrusion Sampling)												
Post-ISCO Groundwater Sampling Events												
Off-Site (Annual) Groundwater Sampling Event												
Annual Engineering Control (Cap) Inspection*												
Enhanced Fluid Recovery (EFR) Events												
Reporting												

* = Cap/site-wide inspections may also be conducted during routine monitoring/site visits to ensure that engineering Controls are performing as designed.

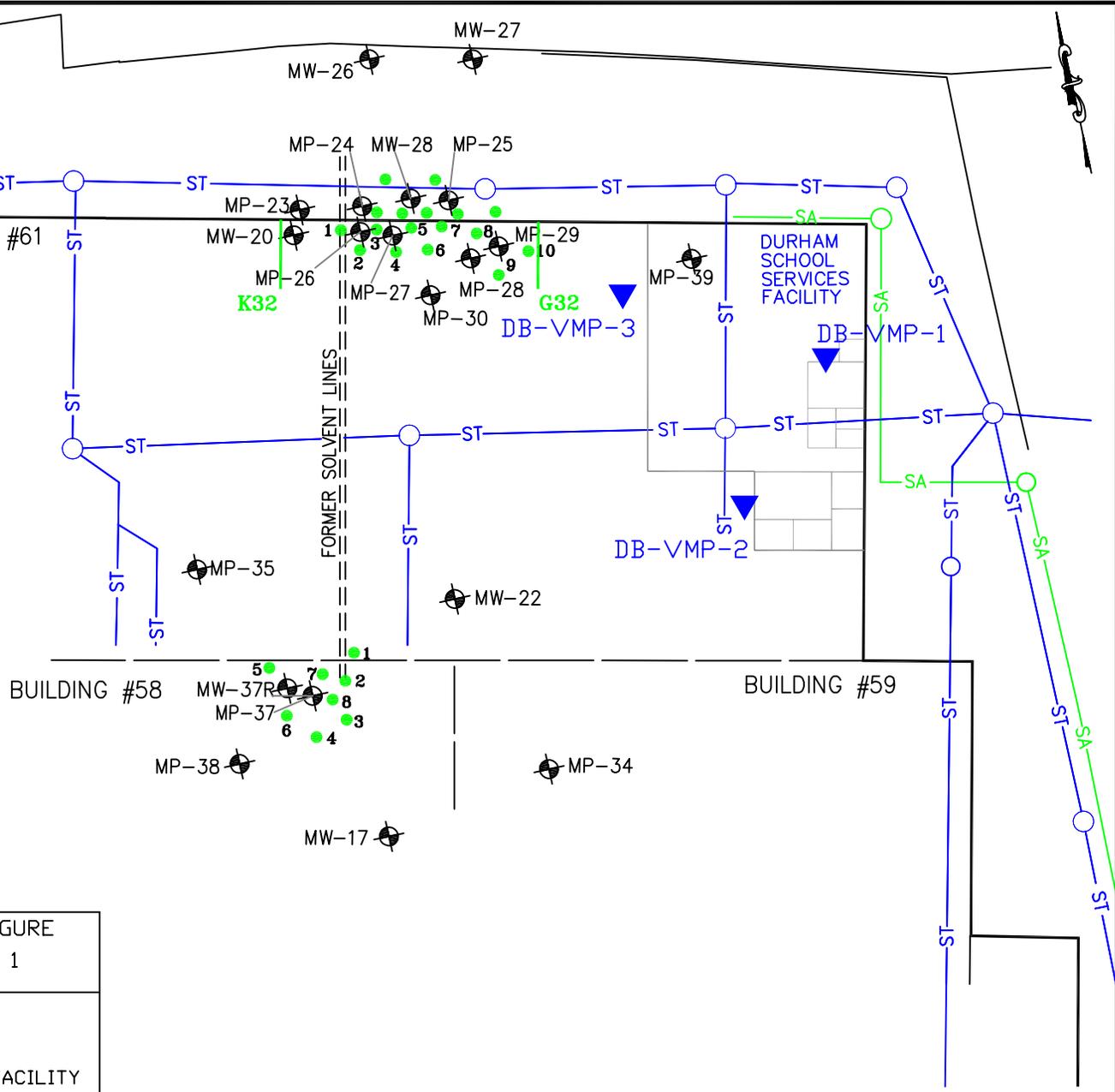
FIGURES

OUTDOOR AMBIENT

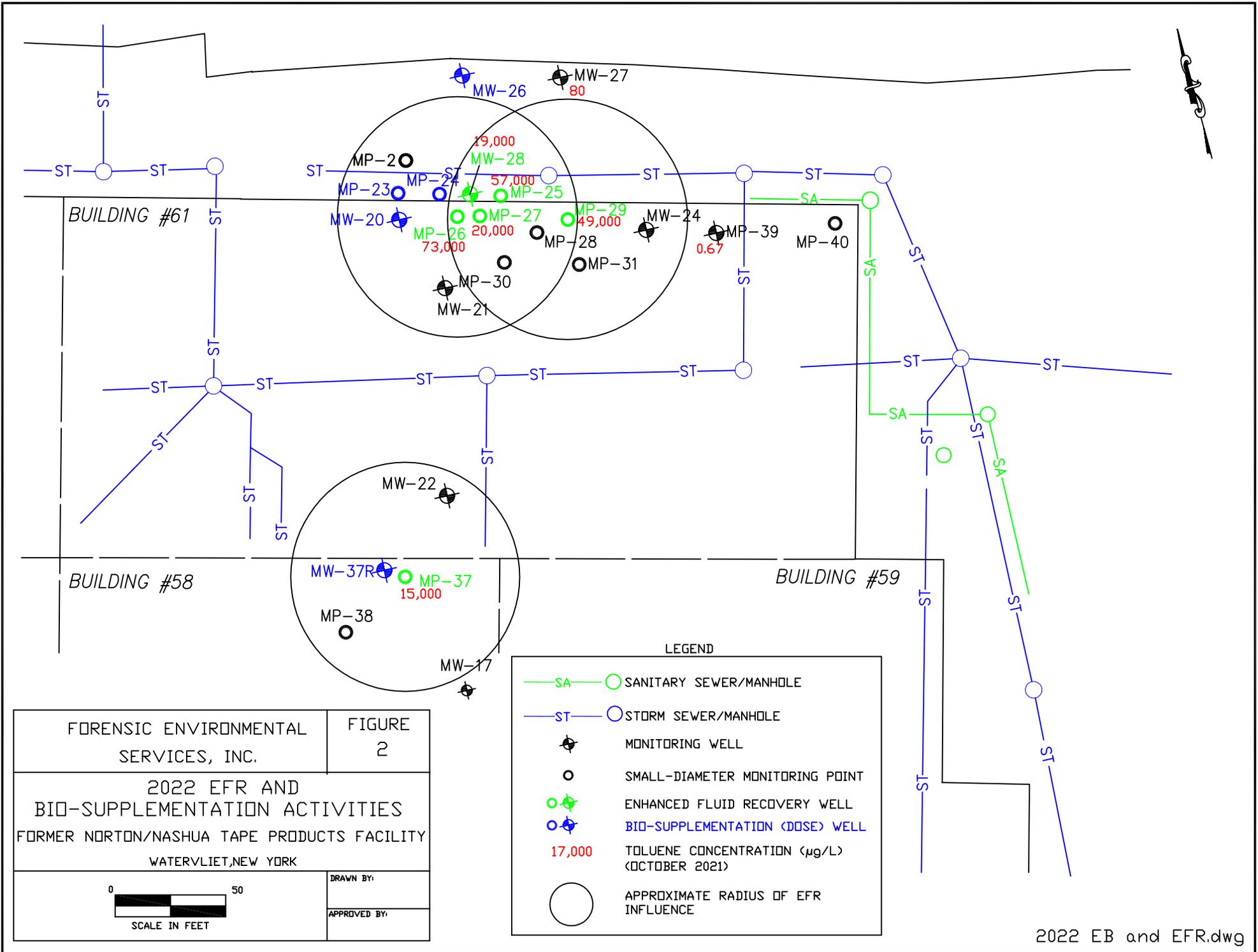
(APPROX. 100 FEET WEST)

LEGEND

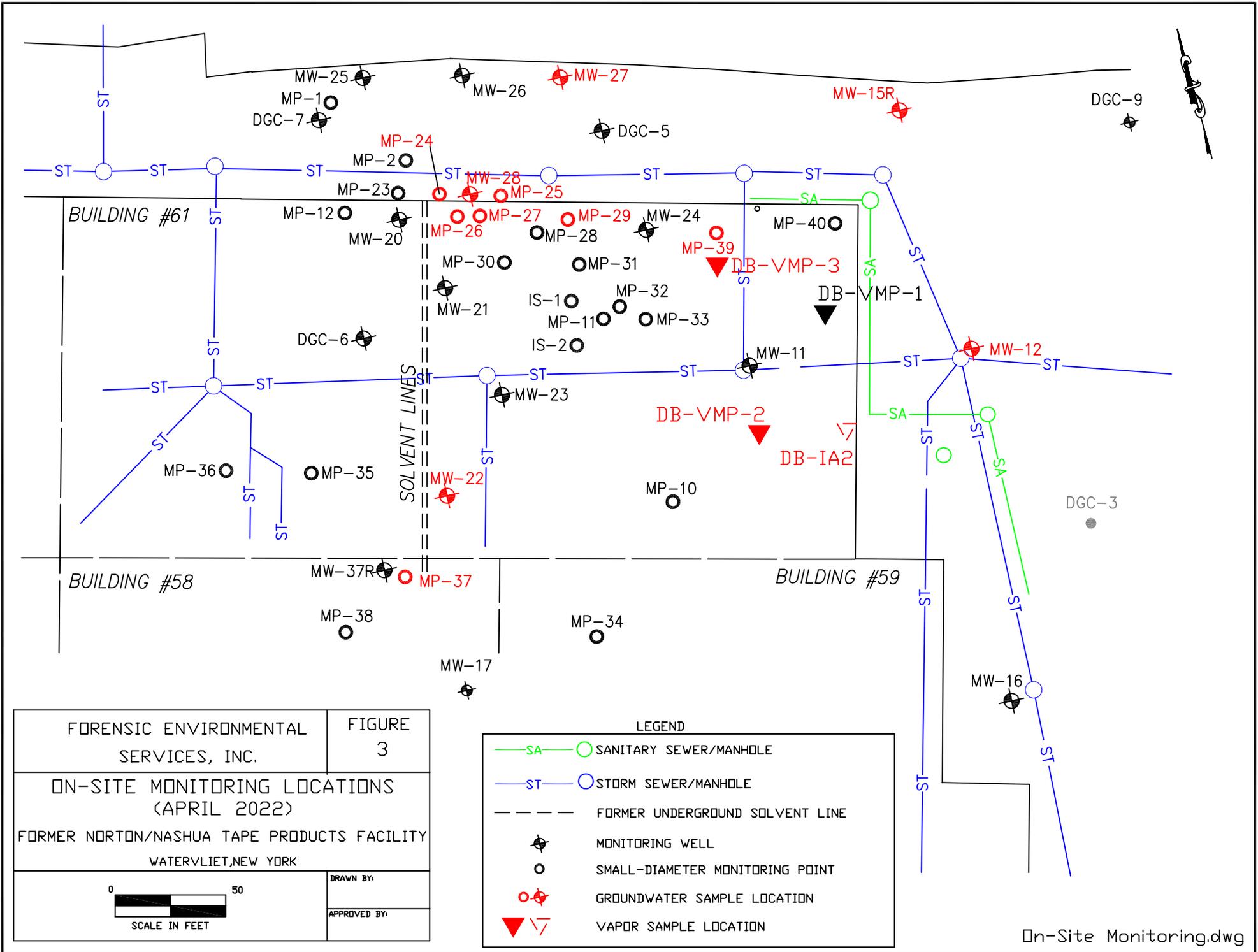
- SA SANITARY SEWER
- ST STORM SEWER
- FORMER UNDERGROUND SOLVENT LINE
- ISCO INJECTION POINT
- 1 ISCO INJECTION POINT (CLEARANCE BORING)
-  MONITORING WELL
-  SUB-SLAB VAPOR MONITORING POINT
-  INDOOR AIR SAMPLE

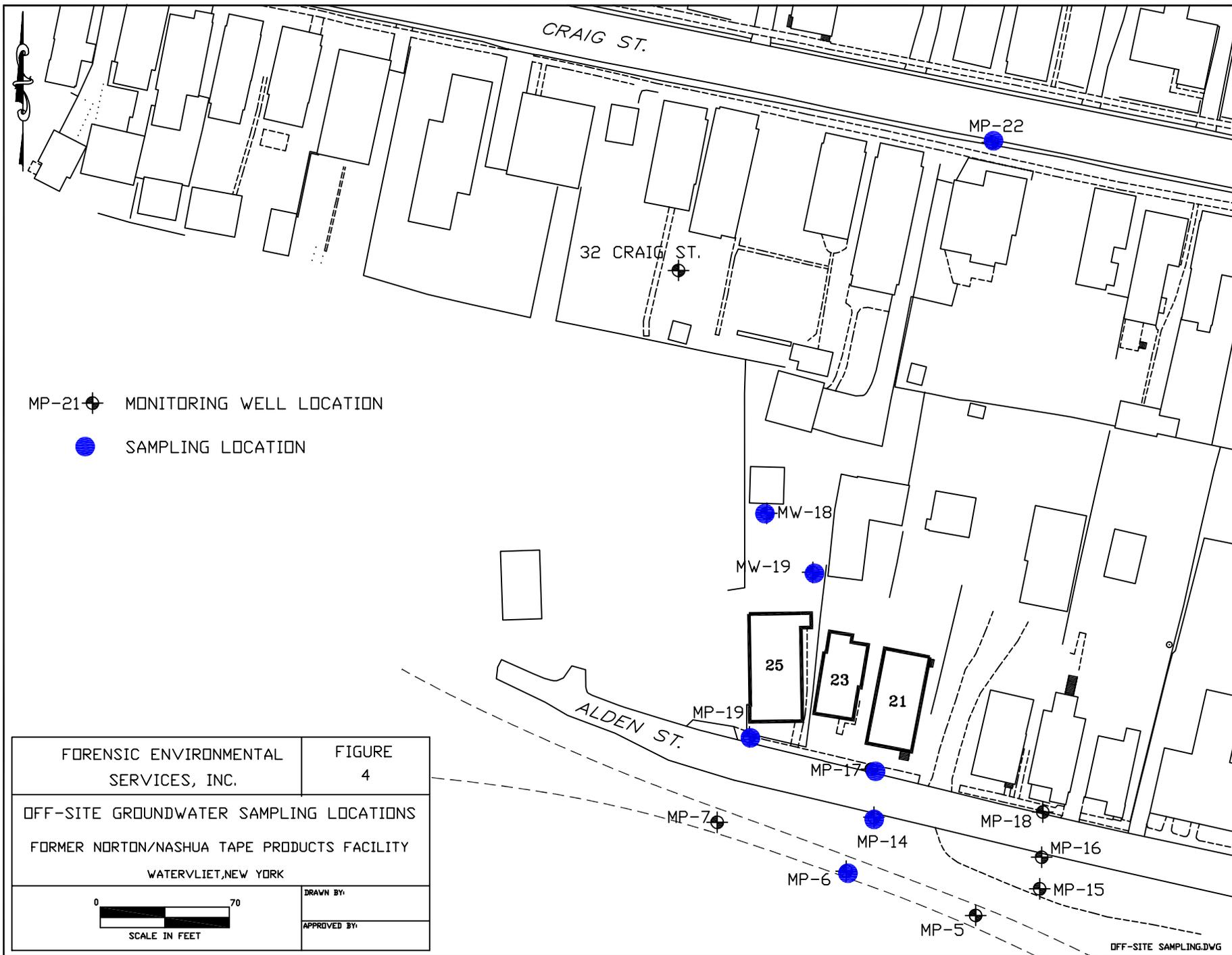


FORENSIC ENVIRONMENTAL SERVICES, INC.	FIGURE 1
ISCO INJECTION AREAS (JUNE 2022)	
FORMER NORTON/NASHUA TAPE PRODUCTS FACILITY WATERVLIET, NEW YORK	
 SCALE IN FEET	DRAWN BY: APPROVED BY:



FORENSIC ENVIRONMENTAL SERVICES, INC.	FIGURE 2
2022 EFR AND BIO-SUPPLEMENTATION ACTIVITIES FORMER NORTON/NASHUA TAPE PRODUCTS FACILITY WATERVLIET, NEW YORK	
<p>SCALE IN FEET</p>	DRAWN BY: APPROVED BY:





ATTACHMENT 1
ANNUAL HAZARDOUS WASTE REPORT

Cycle	Site Name	Site ID
2021	FORMER NORTON CO - NASHUA TAPE PRODUCTS FACIL	NYD066829599

1. Reason for Submittal	
BR / AR with Notification. [Source B]	<i>BR Exempt</i> No

2. Site ID
NYD066829599

3. Site Name
FORMER NORTON CO - NASHUA TAPE PRODUCTS FACIL

4. Site Location		
<u>Street Number</u> 2600	<u>Street 1</u> 7TH AVE	<u>Street 2</u>
<u>Zip</u> 12189	<u>City, Town or Village</u> WATERVLIET	<u>State</u> NEW YORK
<u>Country</u> UNITED STATES	<u>County</u> ALBANY	
<u>Latitude</u> 42.739389	<u>Longitude</u> -73.703083	<u>Use Lat/Long as Primary Address</u> No

5. Site Mailing Address		
<u>Street Number</u> 20	<u>Street 1</u> MOORES RD	<u>Street 2</u>
<u>Zip</u> 19355	<u>City, Town or Village</u> MALVERN	<u>State</u> PENNSYLVANIA
<u>Country</u> UNITED STATES		

6. Site Land Type
Private

7. North American Industry Classification System (NAICS)
<u>Primary NAICS</u> 493110 - GENERAL WAREHOUSING AND STORAGE
<u>Other NAICS</u>

8. Site Contact Person		
<u>First Name</u> KELSEY	<u>Middle Initial</u> L	<u>Last Name</u> HILLEGASS
<u>Title</u> ENVIRONMENTAL PROGRAMS MANAGER	<u>Email</u> KELSEY.HILLEGASS@SAINT-GOBAIN.COM	
<u>Phone Number</u> 610-893-5753	<u>Extension</u>	<u>Fax</u>

8a. Site Contact Address		
<u>Street Number</u> 20	<u>Street 1</u> MOORES RD	<u>Street 2</u>
<u>Zip</u> 19355	<u>City, Town or Village</u> MALVERN	<u>State</u> PENNSYLVANIA
<u>Country</u> UNITED STATES		

9a. Legal Owner #1		
<u>Name</u> STONE MANAGEMENT INC	<u>Date</u> 05/04/2004	<u>Type</u> Private
<u>Street Number</u> 2622	<u>Street 1</u> 7TH AVE	<u>Street 2</u>
<u>Zip</u> 12189	<u>City, Town or Village</u> WATERVLIET	<u>State</u> NEW YORK
<u>Country</u> UNITED STATES		
<u>Email</u>		
<u>Phone Number</u> 518-272-2136	<u>Extension</u>	<u>Fax</u>
<u>Public Comments</u>		

9b. Legal Operator #1		
<u>Name</u> STONE MANAGEMENT INC	<u>Date</u> 05/04/2004	<u>Type</u> Private
<u>Street Number</u> 2600	<u>Street 1</u> 7TH AVE	<u>Street 2</u>
<u>Zip</u> 12189	<u>City, Town or Village</u> WATERVLIET	<u>State</u> NEW YORK
<u>Country</u> UNITED STATES		
<u>Email</u>		
<u>Phone Number</u> 518-272-2136	<u>Extension</u>	<u>Fax</u>
<u>Public Comments</u> CURRENT SITE OPERATIONS (WAREHOUSING)ARE UNRELATED TO HAZARDOUS WASTES. WASTE MATERIALS GENERATED ARE RELATED TO ONGOING SOIL AND GROUNDWATER REMEDIAL ACTIVITIES.		

10. Type of Federal Regulated Waste Activity		
A. Hazardous Waste Activities		
<u>1. Generator of Hazardous Waste (Federal)</u> N - Not a Generator	<u>3. Treater, Storer, or Disposer of Hazardous Waste</u> No	<u>6. Exempt Boiler and / or Industrial Furnace</u> None selected
<u>Generator of Hazardous Waste (State)</u> S - Same as Federal	<u>4. Receives Hazardous Waste from Off-site</u> No	
<u>2. Short Term Generator</u> No	<u>5. Recycler of Hazardous Waste</u> None selected	
B. Waste Codes for Federally Regulated Hazardous Wastes		
<u>Hazardous Waste Codes (Federal)</u> D001, F005		
C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes		
<u>Hazardous Waste Codes (State)</u> None selected		

11. Additional Regulated Waste Activities

A. Other Waste Activities		
<u>1. Transporter of Hazardous Waste</u> None selected	<u>3. United States Importer of Hazardous Waste</u> No	<u>5. Importer/Exporter of SLABs</u> None selected
<u>2. Underground Injection Control</u> No	<u>4. Recognized Trader</u> None selected	

B. Universal Waste Activities	C. Used Oil Activities	
<u>1. Large Quantity Handler of Universal Waste</u> Accumulated/Managed: None selected Generated: None selected	<u>1. Used Oil Transporter</u> None selected	<u>3. Off-Specification Used Oil Burner</u> No
<u>2. Destination Facility for Universal Waste</u> No	<u>2. Used Oil Processor and / or Re-refiner</u> None selected	<u>4. Used Oil Fuel Marketer</u> None selected

D. Pharmaceutical Activities
Your state does not participate in Subpart P.

12. Eligible Academic Entities with Laboratories
<u>1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories.</u> None selected
<u>2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories.</u> No

13. Episodic Generation
Your state does not participate in Episodic Generation.

14. LQG Consolidation of VSQG Waste
Your state does not participate in LQG Consolidation of VSQG Waste.

15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) and Entire Facility
<u>LQG Site Closure of a Central Accumulation Area or Facility</u> No

16. Notification of Hazardous Secondary Material (HSM) Activity
Your state does not participate in HSM.

17. Electronic Manifest Broker
<u>Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?</u> No

18. Comments
<u>Public Comments</u> The hazardous waste is generated in association with remedial activities. The facility is owned/operated by Stone Management, but site remediation is being conducted by Saint-Gobain.

19. Certification

Cycle	Site Name	Site ID
2021	FORMER NORTON CO - NASHUA TAPE PRODUCTS FACIL	NYD066829599

GM 1 Waste Characteristics			
<u>A. Description of hazardous waste</u> TOLUENE/WATER MIXTURE			
<u>B. EPA Hazardous Waste Code(s)</u> D001, F005			
<u>C. State Hazardous Waste Code(s)</u>			
<u>D. Source Code</u> G19	<u>Management Method Code</u>	<u>Country</u>	<u>E. Form Code</u> W219
<u>F. Waste Minimization Code</u> X	<u>G. Radioactive Mixed</u> No		
<u>H. Quantity</u> 4245.0	<u>UOM</u> GALLONS	<u>Density</u> 8.35 lbs/gal	
On-site Generation and Management of Hazardous Waste			
Off-site Shipment of Hazardous Waste			
Site 1	<u>B. EPA ID of facility to which waste was shipped</u> NJD002454544	<u>C. Management Method Code</u> H040	<u>D. Total Quantity Shipped</u> 4245.0
Comments			

Cycle	Site Name	Site ID
2021	FORMER NORTON CO - NASHUA TAPE PRODUCTS FACIL	NYD066829599

OI 1 Site		
<u>A. EPA ID Number of Off-site Installation or Transporter</u> NJD002454544		
<u>B. Name of Off-site Installation or Transporter</u> VEOLIA ES TECHNICAL SOLUTIONS LLC		
<u>C. Handler Type(s)</u> Receiving Facility		
<u>D. Address of Off-site Installation</u> 125 FACTORY LN		
<u>City, Town, or Village</u> MIDDLESEX		
<u>State</u> NJ	<u>Zip Code</u> 08846	<u>Country</u> UNITED STATES
<u>Comments</u>		

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD0060829599	2. Page 1 of 1	3. Emergency Response Phone (877) 818-0087	4. Manifest Tracking Number 001920577 VES		
5. Generator's Name and Mailing Address KELSEY CUMMINGS FORMER NORTON/NASHUA TAPE PROD 3000 7TH AVENUE WATERYLIET, NY 13189 Generator's Phone: 484 467-3616				Generator's Site Address (if different than mailing address) SAME			
6. Transporter 1 Company Name VEOLIA ES TECHNICAL SOLUTIONS				U.S. EPA ID Number NJ D 0 8 0 6 3 1 3 6 9			
7. Transporter 2 Company Name FREEHOLD CARTAGE INC				U.S. EPA ID Number N J E 0 5 4 2 2 6 1 6 4			
8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS 125 FACTORY LANE MIDDLESEX, NJ 08846 Facility's Phone: 732 469-5100				U.S. EPA ID Number N J D 0 0 3 4 5 4 5 4 4			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
X	1. UN1993, WASTE FLAMMABLE LIQUIDS, n.o.s. (TOLUENE, XYLENE), 3. III RC (D001)	1	T T	1545 5000	G	F005 D001	B
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information ER Service Contracted by VESTS - Contract retained by generator covers agency authority on initial transporter to add or substitute additional transporters on generator's behalf. - 15 EPC: 128 W: 1003016 A: MARBULK5							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name ISYAN MARCHALLA ON BEHALF OF SAINT-GER				Signature <i>[Signature]</i> ON BEHALF OF SAINT-GERMAIN		Month Day Year 11 08 21	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____ Transporter signature (for exports only): _____							
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Shawn Bonner Signature <i>[Signature]</i> Month Day Year 11 08 21 Transporter 2 Printed/Typed Name _____ Signature _____ Month Day Year _____							
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____ 18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____ Facility's Phone: _____ 18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. _____ 2. _____ 3. _____ 4. _____							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name _____ Signature _____ Month Day Year _____							

GENERATOR

TRANSPORTER INT'L

DESIGNATED FACILITY



261536

Please print, or type.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD066829599	2. Page 1 of 1	3. Emergency Response Phone (877) 818-0087	4. Manifest Tracking Number 001920633VES		
5. Generator's Name and Mailing Address KELSEY CUMMINGS FORMER NORTON/NASHUA TANK DEPOS 2600 7TH AVENUE WATERVILLE, NY 12189 Generator's Phone: 518 467-3616		Generator's Site Address (if different than mailing address) SAME Kelson Cummings Former Norton/Nashua Tank Depos					
6. Transporter 1 Company Name VEOLIA ES TECHNICAL SOLUTIONS		U.S. EPA ID Number NJ D 0 8 0 6 3 1 3 6 9					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS 125 FACTORY LANE MIDDLESEX, NJ 08846		U.S. EPA ID Number NJ D 0 0 2 4 3 4 3 4 4					
Facility's Phone: 732 469-5100							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt /Lb	13. Waste Codes	
		No.	Type				
		1	1			2697	R005 B
			FT			777	D001
						SR	
14. Special Handling Instructions and Additional Information ER Service Contracted by VESTS - Contract retained by generator confers agency authority on initial transporter to add or substitute additional transporters on generator's behalf. + 1) ERG:128 W:1063016 A:MARBUKX Vac Truck 462234							
15. GENERATOR/SOFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/corced, and are in all respects in proper condition for transport according to applicable International and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (1) (I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name K Kerk Halberg		Signature K Kerk Halberg			Month	Day	Year
					12	16	21
18. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name JEREMY D. NEED		Signature [Signature]			Month	Day	Year
					12	16	21
Transporter 2 Printed/Typed Name		Signature			Month	Day	Year
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number: _____							
Facility's Phone: _____							
18c. Signature of Alternate Facility (or Generator)					Month	Day	Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H061	2.	3.	4.				
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name April Watkins		Signature [Signature]			Month	Day	Year
					12	29	21

GENERATOR

INTL

TRANSPORTER

DESIGNATED FACILITY