

Goodyear Dunlop Tires North America, Ltd.



September 11, 2007

Mr. Glenn May
New York State Dept. of Environmental Conservation
272 Michigan Ave.
Buffalo, NY 14203-2999

Well testing results of Inactive Waste Site No. 915018

Dear Mr. May,

Please find the attached analytical results of our well testing sampled on August 17, 2007. The wells required to be sampled this year (year 13) are downgradient wells B3, B4, & C7. Upgradient wells were not required to be tested at this time.

Please also find our copy summary of the Landfill Inspection held jointly with the DEC on 7/24/07. All areas looked in good condition. This is the first year we allowed the grass to grow in certain areas, at the DEC's request, to encourage ground nesting birds.

Please contact me if you have any questions or if you need any additional information.

Thank you,

A handwritten signature in black ink, appearing to read "M. Craft".

Mark R. Craft
Environmental Coordinator
(716) 879-8497

cc: M. Kaczynski, Plant Engineer
attach: 1. Semi-annual inspection form
2. Lab report
3. Site Layout
4. Long-term sampling schedule
5. Action Levels for Downgradient Wells

IsleChem LLC
 2801 Long Road
 Grand Island, NY 14072
 (716) 773-8614

ANNUAL GROUNDWATER MONITORING

August 17, 2007

Goodyear Dunlop Tire

Tonawanda, New York

Project I.D. # NY708110

Monitoring Well I.D.	Evacuation Date	Monitoring Well Diameter	Water Level (ft.)	Bottom of Well (ft.)	Volume of Standing Water (gallons)	Volume of Evacuated Water (gallons)	Recharge Rate
B - 3	8/16/2007	2	10.3	17.00	3.28	4.0	VS
B - 4	8/16/2007	2	8.2	22.30	6.75	7.0	VS
C - 7	8/16/2007	2	8.0	23.30	7.48	7.5	VS

Abbreviations:

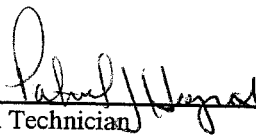
VS = Very Slow ----- Recharge Rate longer than 24 hr period.

S = Slow ----- Recharge Rate within 24 hr period.

R = Rapid ----- Recharge Rate within 1 hr period.

C = Continuous ---- Recharge Rate immediate.

N/R=Not required this event



 Field Technician

08/20/07

 Date

IsleChem, LLC

2801 Long Road
Grand Island
New York 14072
Tel: (716) 773-8614
Fax: (716) 773-8517

Laboratory Analysis Report

Project: Water Samples for Analysis

Phase:

Sample Date: 8/17/2007

Sample Time: 10:30 AM

Report Date: Tuesday, August 28, 2007

Report ID: NY708110.0.7753

PO# / Release#: /

Reference #:

Report Status: **Final**

performed at the request of: Mark Craft
Goodyear Tire & Rubber

PO Box 1109
Buffalo, NY 14240

The enclosed sample results table(s) are for 4 sample(s) received by IsleChem LLC on 8/17/2007 sampled by Patrick Hagerty of IsleChem LLC on 8/17/2007. Also enclosed is the chain of custody submitted with the samples.

Authorized Signature: _____

- Richard V. Finn, Manager of Chemical Testing
 Martin Ruszaj, Director of Chemical Testing

Laboratory Personnel Legend:

WMA William M. Anspach
SJB Stanley Biernat
FB Fred Bozek
DD David Domroes
MF Mary Ferguson
RVF Richard (Dick) V. Finn
EF Eric Fischer
VJH Vivian Hoffman
MR Martin S. Ruszaj
RS Ron Stacy

Sample Results

Sample ID: 1 Client: Goodyear Tire & Rubber
Lab ID / Vessel 44555 / 125826 Report ID: NY708110.0.7753
Location: Well B3 / Field Grab - Water Sampled: 8/17/2007

Parameters / Method	Analyte	Sample Results	Units	Analyst	Date
Heavy Metals using Atomic Spectroscopy					
Arsenic - Soluble / EPA 4.1.3/200.7	Arsenic	0.022	mg/L	RVF	8/28/2007
Arsenic - Total / EPA 4.1.3/200.7	Arsenic	<0.01	mg/L	RVF	8/28/2007
Cadmium - Soluble / EPA 4.1.3/200.7	Cadmium	<0.01	mg/L	RVF	8/28/2007
Cadmium - Total / EPA 4.1.3/200.7	Cadmium	<0.01	mg/L	RVF	8/28/2007
Chromium - Soluble / EPA 4.1.3/200.7	Chromium	<0.01	mg/L	RVF	8/28/2007
Chromium - Total / EPA 4.1.3/200.7	Chromium	<0.01	mg/L	RVF	8/28/2007
Lead - Soluble / EPA 4.1.3/200.7	Lead	<0.01	mg/L	RVF	8/28/2007
Lead - Total / EPA 4.1.3/200.7	Lead	<0.01	mg/L	RVF	8/28/2007
Volatile Organic Compounds					
DUNLOP 5 -Volatiles / EPA 624	1,1,1-Trichloroethane	<6.5	ug/L	RS	8/22/2007
	1,1-Dichloroethane	<5.0	ug/L	RS	8/22/2007
	1,2-Dichloroethene	<5.0	ug/L	RS	8/22/2007
	Benzene	<4.6	ug/L	RS	8/22/2007
	Methyl Ethyl Ketone (MEK)	<10	ug/L	RS	8/22/2007
Wet Chemistry Procedures					
Conductivity / SM 18 2510	Conductivity	1705	um/cm	RVF	8/24/2007
Phenolics (wet chem) / EPA 420.1	Total Phenolics	<0.005	mg/L	MF	8/21/2007
Turbidity / EPA 180.1	Turbidity	198	NTU	RVF	8/17/2007
<i>end of Lab ID number 44555</i>					

Sample Results

Sample ID: 2 Client: Goodyear Tire & Rubber
Lab ID / Vessel 44556 / 125831 Report ID: NY708110.0.7753
Location: Well B4 / Field Grab - Water Sampled: 8/17/2007

Parameters / Method	Analyte	Sample Results	Units	Analyst	Date
Heavy Metals using Atomic Spectroscopy					
Arsenic - Soluble / EPA 4.1.3/200.7	Arsenic	0.017	mg/L	RVF	8/28/2007
Arsenic - Total / EPA 4.1.3/200.7	Arsenic	<0.01	mg/L	RVF	8/28/2007
Cadmium - Soluble / EPA 4.1.3/200.7	Cadmium	<0.01	mg/L	RVF	8/28/2007
Cadmium - Total / EPA 4.1.3/200.7	Cadmium	<0.01	mg/L	RVF	8/28/2007
Chromium - Soluble / EPA 4.1.3/200.7	Chromium	<0.01	mg/L	RVF	8/28/2007
Chromium - Total / EPA 4.1.3/200.7	Chromium	<0.01	mg/L	RVF	8/28/2007
Lead - Soluble / EPA 4.1.3/200.7	Lead	<0.01	mg/L	RVF	8/28/2007
Lead - Total / EPA 4.1.3/200.7	Lead	<0.01	mg/L	RVF	8/28/2007
Volatile Organic Compounds					
DUNLOP 5 -Volatiles / EPA 624	1,1,1-Trichloroethane	<6.5	ug/L	RS	8/22/2007
	1,1-Dichloroethane	<5.0	ug/L	RS	8/22/2007
	1,2-Dichloroethene	<5.0	ug/L	RS	8/22/2007
	Benzene	<4.6	ug/L	RS	8/22/2007
	Methyl Ethyl Ketone (MEK)	<10	ug/L	RS	8/22/2007
Wet Chemistry Procedures					
Conductivity / SM 18 2510	Conductivity	3350	um/cm	RVF	8/24/2007
Phenolics (wet chem) / EPA 420.1	Total Phenolics	<0.005	mg/L	MF	8/21/2007
Turbidity / EPA 180.1	Turbidity	104	NTU	RVF	8/17/2007
<i>end of Lab ID number 44556</i>					

Sample Results

Sample ID: 3 Client: Goodyear Tire & Rubber
Lab ID / Vessel 44557 / 125836 Report ID: NY708110.0.7753
Location: Well C7 / Field Grab - Water Sampled: 8/17/2007

Parameters / Method	Analyte	Sample Results	Units	Analyst	Date
Heavy Metals using Atomic Spectroscopy					
Arsenic - Soluble / EPA 4.1.3/200.7	Arsenic	<0.01	mg/L	RVF	8/28/2007
Arsenic - Total / EPA 4.1.3/200.7	Arsenic	<0.01	mg/L	RVF	8/28/2007
Cadmium - Soluble / EPA 4.1.3/200.7	Cadmium	<0.01	mg/L	RVF	8/28/2007
Cadmium - Total / EPA 4.1.3/200.7	Cadmium	<0.01	mg/L	RVF	8/28/2007
Chromium - Soluble / EPA 4.1.3/200.7	Chromium	<0.01	mg/L	RVF	8/28/2007
Chromium - Total / EPA 4.1.3/200.7	Chromium	0.049	mg/L	RVF	8/28/2007
Lead - Soluble / EPA 4.1.3/200.7	Lead	<0.01	mg/L	RVF	8/28/2007
Lead - Total / EPA 4.1.3/200.7	Lead	<0.01	mg/L	RVF	8/28/2007
Volatile Organic Compounds					
DUNLOP 5 -Volatiles / EPA 624	1,1,1-Trichloroethane	<6.5	ug/L	RS	8/22/2007
	1,1-Dichloroethane	<5.0	ug/L	RS	8/22/2007
	1,2-Dichloroethene	<5.0	ug/L	RS	8/22/2007
	Benzene	<4.6	ug/L	RS	8/22/2007
	Methyl Ethyl Ketone (MEK)	<10	ug/L	RS	8/22/2007
Wet Chemistry Procedures					
Conductivity / SM 18 2510	Conductivity	3580	um/cm	RVF	8/24/2007
Phenolics (wet chem) / EPA 420.1	Total Phenolics	<0.005	mg/L	MF	8/21/2007
Turbidity / EPA 180.1	Turbidity	142	NTU	RVF	8/17/2007
<i>end of Lab ID number 44557</i>					

Sample Results

Sample ID: 4 Client: Goodyear Tire & Rubber
Lab ID / Vessel 44558 / 125837 Report ID: NY708110.0.7753
Location: Trip Blank / Trip Blank - DI Water Sampled: 8/17/2007

Parameters / Method	Analyte	Sample Results	Units	Analyst	Date
Volatile Organic Compounds					
DUNLOP 5 -Volatiles / EPA 624	1,1,1-Trichloroethane	<6.5	ug/L	RS	8/22/2007
	1,1-Dichloroethane	<5.0	ug/L	RS	8/22/2007
	1,2-Dichloroethane	<5.0	ug/L	RS	8/22/2007
	Benzene	<4.6	ug/L	RS	8/22/2007
	Methyl Ethyl Ketone (MEK)	<10	ug/L	RS	8/22/2007

end of Lab ID number 44558

General Disclaimer

- The test results are submitted pursuant to IsleChem LLC's current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- This report is issued for the benefit of and may be relied upon by the client named above. The client bears full responsibility for deciding the level of testing for sample submitted to IsleChem LLC.
- These results pertain only to the items tested.
- This report shall not be reproduced except in full.
- If the sample(s) represented by these test results were not collected by IsleChem LLC then the test results are limited to the reported values determine by the analytical testing process. IsleChem LLC makes no representation regarding the sample's collection technique, condition, volume, homogeneity or any other aspect of the sample(s) prior to IsleChem LLC taking possession of the sample(s) and the influence it may have on the results.
- Unless notified in writing to return the samples covered by this report IsleChem LLC will store what remains of the sample(s), if anything, for a period of 60 days before discarding, unless otherwise required by law. A shipping and handling fee with be charged for the return of any sample(s).
- Certain analytes may not be covered by the NYS DOH or NELAP fields of accreditation. Results for those analytes are generated by the cited method using QA/QC guidelines from IsleChem's Quality Control Manual, where applicable.

The test results in this report meet all NELAP requirements for parameters that are within IsleChem's field of accreditation. Any exceptions to NELAP requirements are noted in the comments field.

IsleChem, LLC
2801 Long Road
Grand Island
New York 14072
Tel: (716) 773-8614
Fax: (716) 773-8517

Organization Name		Project Name		# of Samples / # of Bottles		
Goodyear Tire & Rubber		Well Sampling				
Street Address		Client PO / Release #		Turnaround / Date Results Needed		
PO Box 1109		PO Line 40		1 week		
City, State, ZIP		Date Sampled		IsleChem Project #		
Buffalo, NY 14240		08/17/07		NY 708110 7753		
Contact Person		QC reporting level requested:		Are RUSH charges authorized?		
Mark Craft		Std Full		Yes No		
Phone# and Fax#		Matrix		Bottle Type		
879-18497 / 879-8400		Comp		500ml amber (H2So4)		
Sample Location		Grab		2-40ml vial (HCL)		
125822	Well B3	Water	X	X	500 ml plastic (HNO3)	
125823	Well B3	Water	X	X	500 ml plastic (chilled)	
125825	Well B3	Water	X	X	500ml amber (H2So4)	
125826	Well B3	Water	X	X	2-40ml vial (HCL)	
125827	Well B4	Water	X	X	500 ml plastic (HNO3)	
125828	Well B4	Water	X	X	500ml amber (H2So4)	
125829	Well B4	Water	X	X	2-40ml vial (HCL)	
125830	Well B4	Water	X	X	500 ml plastic (HNO3)	
125831	Well B4	Water	X	X	500ml plastic (chilled)	
125832	Well C7	Water	X	X	500ml amber (H2So4)	
125833	Well C7	Water	X	X	2-40ml vial (HCL)	
125834	Well C7	Water	X	X	500 ml plastic (HNO3)	
125835	Well C7	Water	X	X	500 ml plastic (chilled)	
125836	Well C7	Water	X	X	500 ml plastic (chilled)	
125837	Trip Blank				40ml vial (HCL)	
** Sol. Metals if turb > 50 AS, Cd, Cr, Pb *8260's MEK, Benzene, 1,1-dichloroethane, 1,2-dichloroethane, 1,1,1-trichloroethane						
Sampled by		Date	Time	Received by	Date	Time
[Signature]		08/17/07	1030	[Signature]	8-17-07	12:40
Relinquished by		Date	Time	Received by lab	Date	Time
[Signature]		08/17/07	1030	[Signature]	8-17-07	12:40

IsleChem, LLC
 2801 Long Road
 Grand Island, NY 14072
 716-773-8614
 FAX 716-773-8517

Chain of Custody

by Relinquishing these sample to IsleChem, LLC, you are accepting the current IsleChem, LLC terms and conditions for the sale of services

TABLE 1
SAMPLING SCHEDULE
DUNLOP TIRE CORPORATION
LONG TERM MONITORING PLAN
INACTIVE WASTE SITES 915018 A, B AND C

Year	Analytical Schedule	Number of Sampling Events Per Year										Sampling Season
		Upgradient					Downgradient					
		A6	C1	B3	B4	A4	C5	C7				
1	A	2	2	2	2	2	2	2	2	2	2	Spring/Fall
2,3	B		2	2	2	2	2	2	2	2	2	Spring/Fall
4,5	B			1	1	1	1	1	1	1	1	Spring
6-9	B			1	1	1	1	1	1	1	1	Spring
10	B			1	1	1	1	1	1	1	1	Spring
11-14	B			1	1	1	1	1	1	1	1	Spring
15	B			1	1	1	1	1	1	1	1	Spring
16-19	B			1	1	1	1	1	1	1	1	Spring
20	B			1	1	1	1	1	1	1	1	Spring
21-24	B			1	1	1	1	1	1	1	1	Spring
25	B			1	1	1	1	1	1	1	1	Spring
26-29	B			1	1	1	1	1	1	1	1	Spring
30	B			1	1	1	1	1	1	1	1	Spring

START 1994
 1st year = 1995
 Year 9 2003
 Year 10 05/08 2004

* Analytical Schedules
 A - TCL Volatiles, TCL Semivolatiles, TAL Metals.
 B - Volatiles: 2 Butanone (MEK), Benzene, 1,1 Dichloroethane, 1,2 Dichloroethane (total), 1,1,1 trichloroethane. Other compounds if detected at or above levels of concern in year 1 sampling.
 Semi Volatiles: Total Phenols. Other compounds if detected at or above levels of concern in year 1 sampling.
 Metals: Arsenic, Cadmium, Chromium, Lead. Other analytes if detected at or above levels of concern in year 1 sampling.

TABLE 3

LONG TERM MONITORING PLAN
 INACTIVE WASTE SITES 915018 A, B AND C
 DUNLOP TIRE CORPORATION
 GROUNDWATER ACTION LEVELS FOR DOWNGRADE WELLS

PARAMETER	TYPE	ARAR ¹ VALUE (ppb)	OMW-B3 (ppb)	OMW-B4 ² (ppb)	OMW-C5 (ppb)	OMW-C7 (ppb)
2-Butanone (MEK)	VOC	50	50	50	50	50
Benzene	VOC	0.7	0.7	2	0.7	0.7
1,1-Dichloroethane	VOC	5	5	5	5	5
1,2-Dichloroethane (Total)	VOC	5	5	5	5	5
1,1,1-Trichloroethane	VOC	5	5	5	5	5
Arsenic	MET	25	25	25	25	25
Cadmium	MET	10	10	28	16	10
Chromium	MET	50	50	178	66	50
Lead	MET	25	32	52	50	25
Total Phenols	SEMI	1	1	1	1	1

VOC = Volatile Organic Compounds
 MET = Metals
 SEMI = Semivolatile Organic Compound

¹ NYSDEC Ambient Water Quality Standards and Guidance values, November 1991

² Determined using existing data from OMW-B2

DUNLOP TIRE CORPORATION

LANDFILL CONDITION - ~~QUARTERLY~~ INSPECTION REPORT

Site No.: 915018 A, B & C
 Date of Inspection: 7/24/07
 Name of Inspector: M. CRAFT / B. SADOWSKI - D.E.C.

SEAL - Annual

	Topsoil Erosion Occurring?	Clay Cap Erosion Occurring?	Ditches free of obstruction?	Grass cover adequate?	Paved areas intact?	Note any damage.
AREA "B"						
Southern Area	N	N	Y	Y		-
Northern Area	N	N	Y	Y		-
River Road Ditch	N	N	Y	Y		-
BORROW PIT						
AREA "A"						
Central Area	N	N	Y	Y		-
Northeast Area	N	N	Y	Y		-
AREA "C"						
Outlying Area	N	N	Y	Y		-
Major Area	N	N	Y	Y		-
Ditch at toe of slope	N	N	Y	Y		-
Sheridan Drive Ditch	N	N	Y	Y		-
Stockpile Area	N	N	Y	Y		-
Warehouse ditch	N	N	Y	Y		-
PAVED AREAS						
Parking lot					Y	-
Driveway					Y	-

Describe any corrective action required:

None

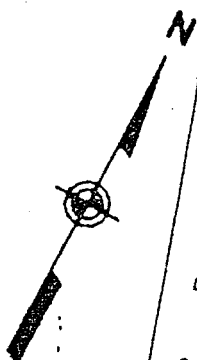
Describe any corrective action taken:

N/A

WEATHER

CONDITIONS:

Temperature	83
Wind Direction	SE
Wind Speed	5
Precipitation Amount	-4"
Sky Conditions	CLEAR
Inches of Snow Cover	0



RIVER ROAD

POLYMER APPLICATIONS

100,000 G. TANK

NO DAMAGE
- GOOD COVERAGE

BLDG. NO. 1

BLDG. NO. 2

BLDG. NO. 4

AREA A

OMW-A4

OMW-B3
(566.55)

SETTLING POND

OMW-A3

AREA B

NO DAMAGE
GOOD GRASS COVERAGE

LEGEND

⊕ PROPOSED MONITORING WELL

⊖ EXISTING MONITORING WELL

□ ESTIMATED LIMITS OF FILL-AREAS A & B (URS, 1990)

▨ ESTIMATED LIMITS OF MAJOR FILL-AREA A (URS, 1990)

(581.15) GROUNDWATER ELEVATION 5/17/91

— 580 — GROUNDWATER CONTOUR

200 0 200



SCALE IN FEET

URS
CONSULTANTS, INC.

LONG TERM MONITORING WELL LOCATIONS
AREAS A & B

FIGURE 1

11200 1/23/93

NEW WAREHOUSE

OMW-C5
(576.67)

OMW-C7

OMW-C1

NO DAMAGE
GOOD COVERAGE

NO
DAMAGE
GOOD COVERAGE

AREA C.

600.

LEGEND

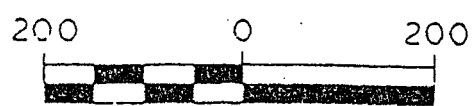
⊕ PROPOSED MONITORING WELL

⊙ EXISTING MONITORING WELL

▭ ESTIMATED LIMITS OF FILL-AREAS A & B (URS, 1988)

(591.42) GROUNDWATER ELEVATION 5/17/91

—590— GROUNDWATER CONTOUR



SCALE IN FEET

AC-4582

URS
CONSULTANTS, INC.

**LONG TERM MONITORING WELL LOCATIONS
AREA C**

FIGURE 2