Goodyear Dunlop Tires North America, Ltd.

June 30, 2009

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

Well Testing Results and Periodic Review Report of Inactive Waste Site No. 915018

Dear Mr. May,

Please find the attached analytical results of our well testing sampled on 5/07/2009. The wells required to be sampled this year (year 15) are downgradient wells B3, B4, A4, C5 & C7. Upgradient wells were not required to be tested at this time.

Please also find the results of the Landfill Condition Inspection held jointly with the DEC on 5/11/09.

We continue to allow the grass to grow until August in certain areas, at the NYSDEC's request, to encourage ground nesting birds.

Finally, also submitted with these findings are the Periodic Review Report and Institutional and Engineering Controls Certification Form (IC/EC) as requested by the NYSDEC.

I will transmit this report electronically (.pdf) and also mail you a hard copy.

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

Thank you,

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 (sample points)
4. Site Layout (grass growth plan)
5. Long-term sampling schedule
6. Action Levels for Downgradient Wells
7. Periodic Review Report (with sampling location map)
8. IC/EC Certification Form

welltest09.doc

File 7.4

GOODYEAR DUNLOP TIRES, NORTH AMERICA LTD.
LANDFILL CONDITION - SEMI-ANNUAL INSPECTION REPORT

Site No.: 915018 A, B & C

Name of Inspector: M Craft / Brian Sodowski

Date of Inspection: 5/11/09

	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	Y	Some bare spots
Northern Area	N	N	Y	Y	Y	OK
River Road Ditch	N	N	Y	Y	Y	OK
BORROW PIT						
AREA "A"						
Central Area	N	N	Y	Y	N/A	no damage although grass
Northeast Area	N	N	Y	Y	N/A	needs to be cut closer to woods
AREA "C"						
Outlying Area	N	N	Y	Y	N/A	–
Major Area	N	N	Y	Y		–
Ditch at Toe of Slope	N	N	(N)	Y		DITCH NEED CLEANING
Sheridan Drive Ditch	N	N	Y	Y		–
Stockpile Area	N	N	Y	Y		–
Warehouse Ditch	N	N	Y	Y	N/A	–
Paved Areas						
Parking Lot	OK				Y	–
Driveway	OK				Y	–

WEATHER CONDITIONS:

Temperature	65
Wind Direction	SE
Wind Speed	15-20
Precipitation Amount	0
Sky Conditions	CLR
Inches of Snow Cover	NONE

Describe Any Corrective Action Required:

Some bare spots, tire ruts in area C, Ditch cleaning & repair rejd in some areas.

Describe Any Corrective Action Taken:

Defender & Haverath contacted.

RECEIVED
JUL 07 2009
NYSDEC REG 9
FOIL
REL UNREL

Groundwater Monitoring Information Sheet

Site Name: Goodyear Dunlop
Date: 05/07/09

Monitoring Well ID: A-4
Sampling Date: 05/07/09

Well Structure Data

Evacuation Date: 05/07/09
Water Elevation: _____
Top of Inner Casing Elevation: 0
Bottom of Well: -25.8'
Monitoring Well Diameter: 2"
Volume of Standing Water: 3.12 gallons
Water Level: -4.6'
Volume of Excavated Water: 9 gallons
Appearance/Observations: Clear a few solids

Well Field Parameter Data

pH - Standard Units: 7.32
Specific Conductance (umhos/cm): _____
Temperature - deg F: 90c / 48.2
Turbidity (ntu): _____

Misc. Well Information

Was Well Locked? ☒ Yes ☐ No
Physical Condition of Well ☐ Good ☒ Fair ☐ Poor
Was Well I.D. Easily Visible? ☒ Yes ☐ No
Solids Content ☒ None ☐ Medium ☐ High
Weather on Sampling Day: rain to clearing
Purging Method: manual bailer

Patrick J Hagerty 05/07/09
Field Technician Signature Date

Groundwater Monitoring Information Sheet

Site Name: Goodyear Dunlop
Date: 05/07/09

Monitoring Well ID: B-3
Sampling Date: 05/07/09

Well Structure Data

Evacuation Date: 05/07/09 — Water Elevation: _____

Top of Inner Casing Elevation: 0 — Bottom of Well: -17.0'

Monitoring Well Diameter: 2" — Volume of Standing Water 1.85 gallons

Water Level: - 5.6' — Volume of Excavated Water 5.5 gallons

Appearance/Observations: Clear some specks or particles

Well Field Parameter Data

pH - Standard Units: 6.85 — Specific Conductance (umhos/cm): _____

Temperature - deg F: 80C / 46.4 — Turbidity (ntu): _____

Misc. Well Information

Was Well Locked ? ☐ Yes ☒ No — Physical Condition of Well ☒ Good ☐ Fair ☐ Poor

Was Well I.D. Easily Visible? ☐ Yes ☒ No — Solids Content ☒ None ☐ Medium ☐ High

Weather on Sampling Day: rain to clearing — Purging Method: manual bailer

Patrick Hagerty — 05/07/09
Field Technician Signature — Date

Groundwater Monitoring Information Sheet

Site Name: Goodyear Dunlop
Date: 05/07/09

Monitoring Well ID: B4
Sampling Date: 05/07/09

Well Structure Data

Evacuation Date: 05/07/09 — Water Elevation: _____

Top of Inner Casing Elevation: 0 — Bottom of Well: -22.2'

Monitoring Well Diameter: 2" — Volume of Standing Water 2.90 gallons

Water Level: -4.4' — Volume of Excavated Water 8.5 gallons

Appearance/Observations: Clear

Well Field Parameter Data

pH - Standard Units: 7.25 — Specific Conductance (umhos/cm): _____

Temperature - deg F: 7°C/44.6 — Turbidity (ntu): _____

Misc. Well Information

Was Well Locked? ☒ Yes ☐ No — Physical Condition of Well ☒ Good ☐ Fair ☐ Poor

Was Well I.D. Easily Visible? ☒ Yes ☐ No — Solids Content ☒ None ☐ Medium ☐ High

Weather on Sampling Day: rain to clearing — Purging Method: manual bailer

Patrick Hogerty — 05/07/09

Field Technician Signature — Date

Groundwater Monitoring Information Sheet

Site Name: Goodyear Dunlop
Date: 05/07/09

Monitoring Well ID: C-5
Sampling Date: 05/07/09

Well Structure Data

Evacuation Date: 05/07/09 — Water Elevation: _____

Top of Inner Casing Elevation: 0' — Bottom of Well: -29.3'

Monitoring Well Diameter: 2" — Volume of Standing Water 4.28 gallons

Water Level: -3.0' — Volume of Excavated Water 12 gallons

Appearance/Observations: Clear some cloudiness at end of bailing

Well Field Parameter Data

pH - Standard Units: 7.38 — Specific Conductance (umhos/cm): _____

Temperature - deg F: 12°C / 53.6 — Turbidity (ntu): _____

Misc. Well Information

Was Well Locked? ☒ Yes ☐ No — Physical Condition of Well: ☒ Good ☐ Fair ☐ Poor

Was Well I.D. Easily Visible? ☒ Yes ☐ No — Solids Content: ☐ None ☒ Medium ☐ High

Weather on Sampling Day: rain to clearing — Purging Method: manual bailer

Patrick J Hagerty 05/07/09
Field Technician Signature — Date

Groundwater Monitoring Information Sheet

Site Name: Goodyear Dunlop
Date: 05/07/09

Monitoring Well ID: C-7
Sampling Date: 05/07/09

Well Structure Data

Evacuation Date: 05/07/09
Water Elevation: _____
Top of Inner Casing Elevation: 0
Bottom of Well: 23.41'
Monitoring Well Diameter: 2"
Volume of Standing Water: 3.16 gallons
Water Level: -4.0'
Volume of Excavated Water: 11 gallons
Appearance/Observations: Clear some cloudiness at end of bailing

Well Field Parameter Data

pH - Standard Units: 7.45
Specific Conductance (umhos/cm): _____
Temperature - deg F: 11°C / 51.8
Turbidity (ntu): _____

Misc. Well Information

Was Well Locked? ☒ Yes ☐ No
Physical Condition of Well: ☒ Good ☐ Fair ☐ Poor
Was Well I.D. Easily Visible? ☒ Yes ☐ No
Solids Content: ☒ None ☐ Medium ☐ High
Weather on Sampling Day: rain to clearing
Purging Method: _____

Patrick J Hogarty — 05/07/09
Field Technician Signature — Date

IsleChem, LLC Analysis Report

Client:	Mark Craft Goodyear Dunlop Tires NA, Ltd. PO Box 1109 Buffalo, NY 14240	Project:	**Water Samples for Analysis** Well Sampling
Report Date:	Thursday, June 25, 2009	Phase:	
Report ID:	**NY905059.0.16384**	Batch:	--
PO# / Release#	4501270070 - Item 40 /	Contact	Mark Craft
Reference #:	Item #00040	Authorized Signature:	
Sample Date:	**Thursday, May 07, 2009**		Richard V. Finn, Manager of Chemical Testing
Sample Time:	**2:45:00 PM**		
Report Status:	**Final**		

The following result table is for 6 samples received by IsleChem LLC on 05/08/2009 sampled by Patrick Hagerty of IsleChem LLC on 05/07/2009.
Also enclosed is the paperwork submitted with the samples.
Notes:

Analyte Group / Method	Analyte	Vessel ID	**Results**	**Units**	Analyst	Date
Sample ID	Location / Description					
1	Well B3 / Field Grab - Ground Water					
Goodyear Total Metals		163767				
EPA 200.7 Rev 4.4	Arsenic, Total		**0.017**	**mg/L**	RVF	5/20/2009
	Cadmium, Total		**<0.01**	**mg/L**	RVF	5/20/2009
	Chromium, Total		**<0.01**	**mg/L**	RVF	5/20/2009

Analyte Group / Method	Analyte	Vessel ID	**Results**	**Units**	Analyst	Date
Sample ID	Location / Description					
1	Well B3 / Field Grab - Ground Water					
EPA 200.7 Rev 4.4	Lead, Total		**<0.01**	**mg/L**	RVF	5/20/2009
Turbidity		163768				
SM 18-20 2130 B (01)	Turbidity		**2.10**	**NTU**	RVF	5/15/2009
Goodyear Volatiles (5)		163765, 163766				
EPA 624	1,1,1-Trichloroethane		**<5.0**	**ug/L**	RS	5/10/2009
	1,1-Dichloroethane		**<5.0**	**ug/L**	RS	5/10/2009
	1,2-Dichloroethene (Total)		**<5.0**	**ug/L**	RS	5/10/2009
EPA 8260B	2-Butanone (Methylethyl ketone)		**<5.0**	**ug/L**	RS	5/10/2009
EPA 624	Benzene		**<0.7**	**ug/L**	RS	5/10/2009
Phenols		163764				
EPA 420.1 Rev 1978	Phenols		**0.009**	**mg/L**	FB	5/18/2009

end of Lab ID number 91900

Analyte Group / Method	Analyte	Vessel ID	**Results**	**Units**	Analyst	Date
Sample ID	Location / Description					
2	Well B4 / Field Grab - Ground Water					
Goodyear Total Metals		163772				
EPA 200.7 Rev 4.4	Arsenic, Total		**<0.01**	**mg/L**	RVF	5/20/2009
	Cadmium, Total		**<0.01**	**mg/L**	RVF	5/20/2009
	Chromium, Total		**0.013**	**mg/L**	RVF	5/20/2009
	Lead, Total		**<0.01**	**mg/L**	RVF	5/20/2009
Turbidity		163773				
SM 18-20 2130 B (01)	Turbidity		**0.15**	**NTU**	RVF	5/15/2009
Goodyear Volatiles (5)		163770, 163771				
EPA 624	1,1,1-Trichloroethane		**<5.0**	**ug/L**	RS	5/10/2009
	1,1-Dichloroethane		**<5.0**	**ug/L**	RS	5/10/2009
	1,2-Dichloroethene (Total)		**<5.0**	**ug/L**	RS	5/10/2009
EPA 8260B	2-Butanone (Methylethyl ketone)		**<5.0**	**ug/L**	RS	5/10/2009
EPA 624	Benzene		**<0.7**	**ug/L**	RS	5/10/2009
Phenols		163769				
EPA 420.1 Rev 1978	Phenols		**0.008**	**mg/L**	FB	5/18/2009

end of Lab ID number 91901

Analyte Group / Method	Analyte	Vessel ID	Results	Units	Analyst	Date
Sample ID	Location / Description					
3	Well C7 / Field Grab - Ground Water					
Goodyear Total Metals		163777				
EPA 200.7 Rev 4.4	Arsenic, Total		**<0.01**	**mg/L**	RVF	5/20/2009
	Cadmium, Total		**<0.01**	**mg/L**	RVF	5/20/2009
	Chromium, Total		**0.027**	**mg/L**	RVF	5/20/2009
	Lead, Total		**<0.01**	**mg/L**	RVF	5/20/2009
Turbidity		163778				
SM 18-20 2130 B (01)	Turbidity		**0.037**	**NTU**	RVF	5/15/2009
Goodyear Volatiles (5)		163775, 163776				
EPA 624	1,1,1-Trichloroethane		**<5.0**	**ug/L**	RS	5/10/2009
	1,1-Dichloroethane		**<5.0**	**ug/L**	RS	5/10/2009
	1,2-Dichloroethene (Total)		**<5.0**	**ug/L**	RS	5/10/2009
EPA 8260B	2-Butanone (Methylethyl ketone)		**<5.0**	**ug/L**	RS	5/10/2009
EPA 624	Benzene		**<0.7**	**ug/L**	RS	5/10/2009
Phenols		163774				
EPA 420.1 Rev 1978	Phenols		**0.006**	**mg/L**	FB	5/18/2009

end of Lab ID number 91902

Analyte Group / Method	Analyte	Vessel ID	**Results**	**Units**	Analyst	Date
Sample ID	Location / Description					
4	Trip Blank / Field Grab - Ground Water					
Goodyear Volatiles (5)		163779				
EPA 624	1,1,1-Trichloroethane		**<5.0**	**ug/L**	RS	5/11/2009
	1,1-Dichloroethane		**<5.0**	**ug/L**	RS	5/11/2009
	1,2-Dichloroethene (Total)		**<5.0**	**ug/L**	RS	5/11/2009
EPA 8260B	2-Butanone (Methylethyl ketone)		**<5.0**	**ug/L**	RS	5/11/2009
EPA 624	Benzene		**<0.7**	**ug/L**	RS	5/11/2009

end of Lab ID number 91903

Analyte Group / Method	Analyte	Vessel ID	**Results**	**Units**	Analyst	Date
Sample ID	Location / Description					
5	Well A 4 / Field Grab - Ground Water					
Goodyear Total Metals		163783				
EPA 200.7 Rev 4.4	Arsenic, Total		**<0.01**	**mg/L**	RVF	5/20/2009
	Cadmium, Total		**0.012**	**mg/L**	RVF	5/20/2009
	Chromium, Total		**0.012**	**mg/L**	RVF	5/20/2009
	Lead, Total		**<0.01**	**mg/L**	RVF	5/20/2009
Turbidity		163784				
SM 18-20 2130 B (01)	Turbidity		**0.45**	**NTU**	RVF	5/15/2009
Goodyear Volatiles (5)		163781, 163782				
EPA 624	1,1,1-Trichloroethane		**<5.0**	**ug/L**	RS	5/10/2009
	1,1-Dichloroethane		**<5.0**	**ug/L**	RS	5/10/2009
	1,2-Dichloroethene (Total)		**<5.0**	**ug/L**	RS	5/10/2009
EPA 8260B	2-Butanone (Methylethyl ketone)		**<5.0**	**ug/L**	RS	5/10/2009
EPA 624	Benzene		**<0.7**	**ug/L**	RS	5/10/2009
Phenols		163780				
EPA 420.1 Rev 1978	Phenols		**<0.005**	**mg/L**	FB	5/18/2009

end of Lab ID number 91904

Analyte Group / Method	Analyte	Vessel ID	**Results**	**Units**	Analyst	Date
Sample ID	Location / Description					
6	Well C-5 / Field Grab - Ground Water					
Goodyear Total Metals		163788				
EPA 200.7 Rev 4.4	Arsenic, Total		**<0.01**	**mg/L**	RVF	5/20/2009
	Cadmium, Total		**<0.01**	**mg/L**	RVF	5/20/2009
	Chromium, Total		**0.012**	**mg/L**	RVF	5/20/2009
	Lead, Total		**<0.01**	**mg/L**	RVF	5/20/2009
Turbidity		163789				
SM 18-20 2130 B (01)	Turbidity		**1.98**	**NTU**	RVF	5/15/2009
Goodyear Volatiles (5)		163786, 163787				
EPA 624	1,1,1-Trichloroethane		**<5.0**	**ug/L**	RS	5/11/2009
	1,1-Dichloroethane		**<5.0**	**ug/L**	RS	5/11/2009
	1,2-Dichloroethene (Total)		**<5.0**	**ug/L**	RS	5/11/2009
EPA 8260B	2-Butanone (Methylethyl ketone)		**<5.0**	**ug/L**	RS	5/11/2009
EPA 624	Benzene		**<0.7**	**ug/L**	RS	5/11/2009
Phenols		163785				
EPA 420.1 Rev 1978	Phenols		**<0.005**	**mg/L**	FB	5/12/2009

end of Lab ID number 91905

Analyte Group / Method	Analyte	Vessel ID	**Results**	**Units**	Analyst	Date

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.

Organization Name	Project Name	# of Samples / # of Bottles
Goodyear Dunlop Tires NA, Ltd.	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	05/07/09	N905059 16384
Contact Person	Electronic reporting upon request please provide e-mail below:	Are RUSH charges authorized? Yes No
Mark Craft	E-mail:	
Phone# and Fax#		
879-18497 / 879-8400		

Sample ID	Sample Location	Matrix	Comp	Grab	Total Rec. Phenol	Vols. Specific *	As,Cd,Cr, Pb	Sol. Metals **						Bottle Type
163764	Well B3	Water		x	x									500ml amber (H2So4)
163765 163766	Well B3	Water		x		x								2- 40ml vial (HCL)
163767	Well B3	Water		x			x							500 ml plastic (HNO3)
163768	Well B3	Water		x				x						500 ml plastic (chilled)
163769	Well B4	Water		x	x									500ml amber (H2So4)
163770 163771	Well B4	Water		x		x								2- 40ml vial (HCL)
163772	Well B4	Water		x			x							500 ml plastic (HN03)
163773	Well B4	Water		x				x						500ml plastic (chilled)
163774	Well C7	Water		x	x									500ml amber (H2So4)
163775 163776	Well C7	Water		x		x								2-40ml vial (HCL)
163777	Well C7	Water		x			x							500 ml plastic (HN03)
163778	Well C7	Water		x				x						500 ml plastic (chilled)
163779	Trip Blank					x								40ml vial (HCL)
	** Sol. Metals if turb > 50 AS, Cd, Cr, Pb													
	* MEK,Benzene, 1,1-dichloroethane, 1,2-dichloroethane, 1,1,1-trichloroethane													

Sampled by	Date	Time	Received by	Date	Time
Patrick / Wagerly	05/07/09	1445			
Relinquished by	**Date**	**Time**	**Received by lab**	**Date**	**Time**
Patrick / Wagerly	05/07/09	1530	K Bronson	5-8-09	8:00 am

IsleChem, LLC
2801 Long Road
Grand Island, NY 14072
716-773-8401
FAX 716-773-8517

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

Chain of Custody

Organization Name	Project Name	# of Samples / # of Bottles
Goodyear Dunlop Tires NA, Ltd.	Well Sampling	2 / 10
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	05/07/09	N905059 16384
Contact Person	Electronic reporting upon request please provide e-mail below:	Are RUSH charges authorized? Yes No
Mark Craft	E-mail:	
Phone# and Fax#		
879-18497 / 879-8400		

Sample ID	Sample Location	Matrix	Comp	Grab	Total Rec. Phenol	Vols. Specific *	As,Cd,Cr, Pb	Sol. Metals **	Bottle Type
163780	Well A-4	Water		x	x				500ml amber (H2So4)
163781 163782	Well A-4	Water		x		x			2- 40ml vial (HCL)
163783	Well A-4	Water		x			x		500 ml plastic (HNO3)
163784	Well A-4	Water		x				x	500 ml plastic (chilled)
163785	Well C-5	Water		x	x				500ml amber (H2So4)
163786 163787	Well C-5	Water		x		x			2- 40ml vial (HCL)
163788	Well C-5	Water		x			x		500 ml plastic (HN03)
163789	Well C-5	Water		x				x	500ml plastic (chilled)

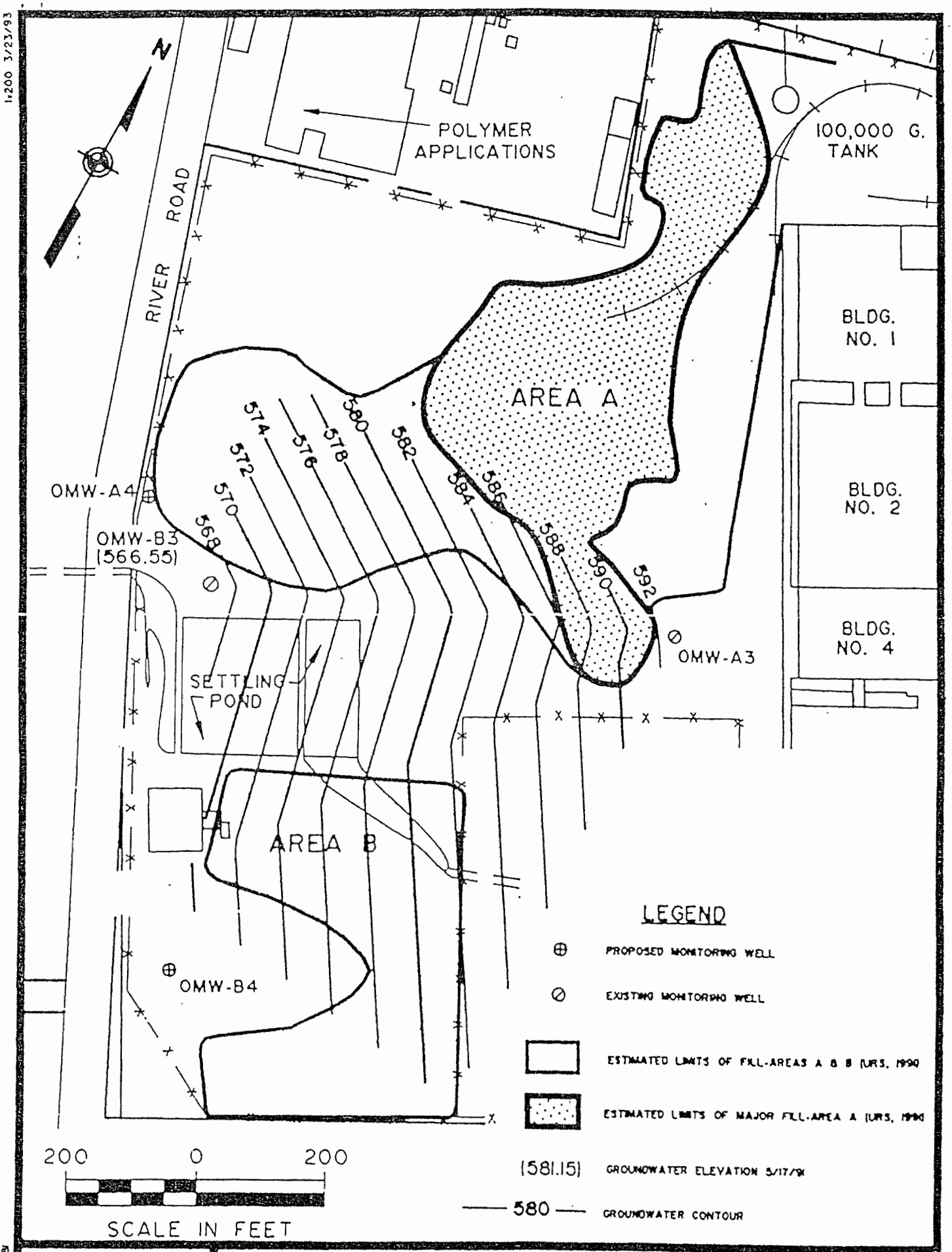
** Sol. Metals if turb > 50 AS, Cd, Cr, Pb

* MEK,Benzene, 1,1-dichloroethane, 1,2-dichloroethane, 1,1,1-trichloroethane

Sampled by	Date	Time	Received by	Date	Time
Patrick J Nagesty	05/07/09	1445			
Relinquished by	**Date**	**Time**	**Received by lab**	**Date**	**Time**
Patrick J Nagesty	05/07/09	1530	K Burton	5-8-09	8:00 AM

IsleChem, LLC
2801 Long Road
Grand Island, NY 14072
716-773-8401
FAX 716-773-8517

Chain of Custody

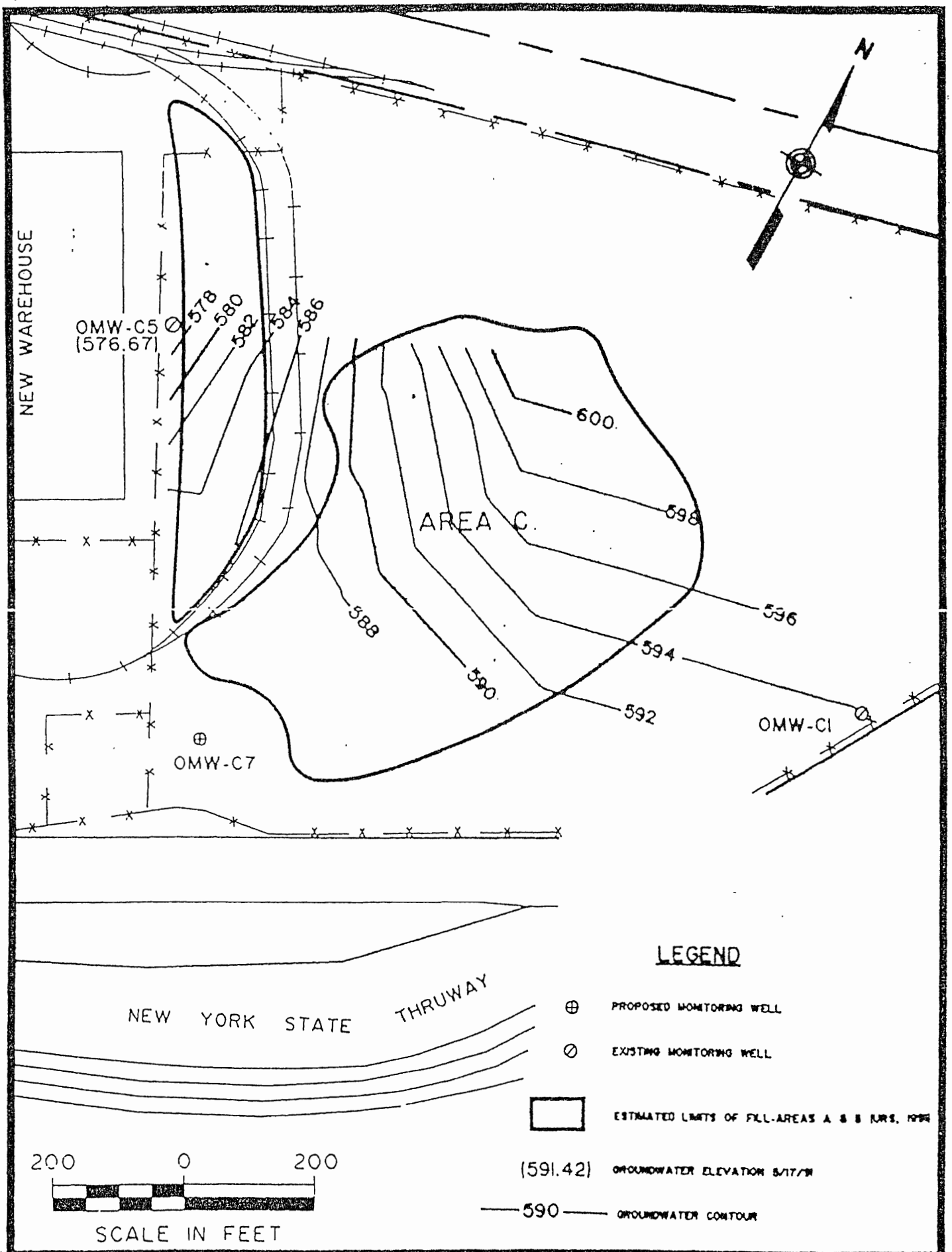


AC-4681

URS CONSULTANTS, INC.

LONG TERM MONITORING WELL LOCATIONS AREAS A & B

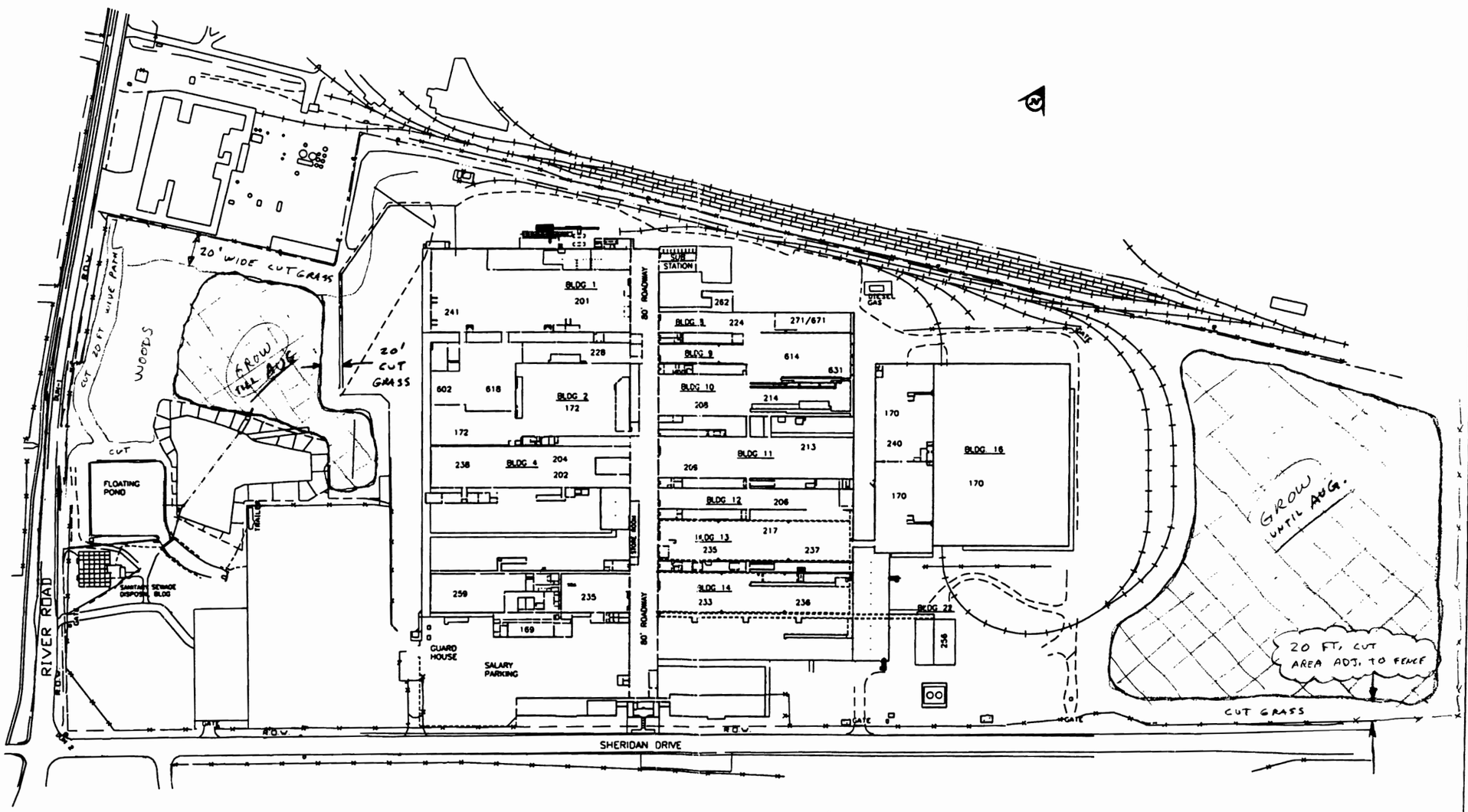
FIGURE 1



URS CONSULTANTS, INC.

LONG TERM MONITORING WELL LOCATIONS
AREA C

FIGURE 2



LEGEND:

LATE SEASON CUTTING
- ALLOW TO GROW UNTIL AUGUST

REFERENCE DWG:
50-14483 DUNLOP PLANT & PROPERTY MAP

NOTE; 20 FT. WIDE CUT AREA ADJACENT TO PERIMETER

THIS DRAWING IS THE PROPERTY OF THE DUNLOP TIRE CORPORATION, AND LOANED ON THE EXPRESS CONDITION THAT IT IS NOT TO BE REPRODUCED, USED OR DUPLICATED EXCEPT AS AUTHORIZED IN WRITING BY DUNLOP

TOLERANCE UNLESS SPECIFIED
FABRICATION
0 TO 6in ± 1/32 IN.
6in TO 2ft ± 1/16 IN.
2ft AND UP ± 1/8 IN.
ANGLES ± 1 DEGREE
MACHINING
METRIC: 1 PLACE DEC (mm) ± .10 mm
2 PLACE DEC (mm) ± .05 mm
ANGLES ± 1/4 DEGREE
FINISH 125 MICRO INCHES
BREAK ALL EDGES

NO.	REVISION	DATE	BY

PARTS LIST NO:

DUNLOP
TIRE CORPORATION
PLANT ENGINEERING BUFFALO, NEW YORK

TITLE
DUNLOP TIRE CORPORATION
SITE LAYOUT - PEST - RODENT CONTROL

PROJECT NO: DRG NO:
DWN PREM SCALE 1"=100' DATE 8/24/09
CHKD DWG NO. B16-0119-002
APPD

MODEL NAME: B16-0097-001-00 M/ACAD PLOT FILE: DRAWING FILE: B1609701.DWG

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	
START 1994 1st year = 1995 1	A	2	2	2	2	2	2	2	Spring/Fall
2,3	B			2	2	2	2	2	Spring/Fall
4,5	B			1	1	1	1	1	Spring
6-9	B			1	1			1	Spring
Year 9 2003 10	B			1	1	1	1	1	Spring
'05 11-14 '08	B			1	1			1	Spring
'09 15	B			1	1	1	1	1	Spring
'10 16-19 '13	B			1	1			1	Spring
'14 20	B			1	1	1	1	1	Spring
'15 21-24 '18	B			1	1			1	Spring
'19 25	B			1	1	1	1	1	Spring
'20 26-29 '24	B			1	1			1	Spring
'25 30	B			1	1	1	1	1	Spring

Year 10 2004

* Analytical Schedules

A - TCL Volatiles, TCL Semivolatiles, TAL Metals.

B - Volatiles: 2 Butanone (MEK), Benzene, 1,1 Dichloroethane, 1,2 Dichloroethene (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 DOWNGRADIENT 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-Dichloroethene (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

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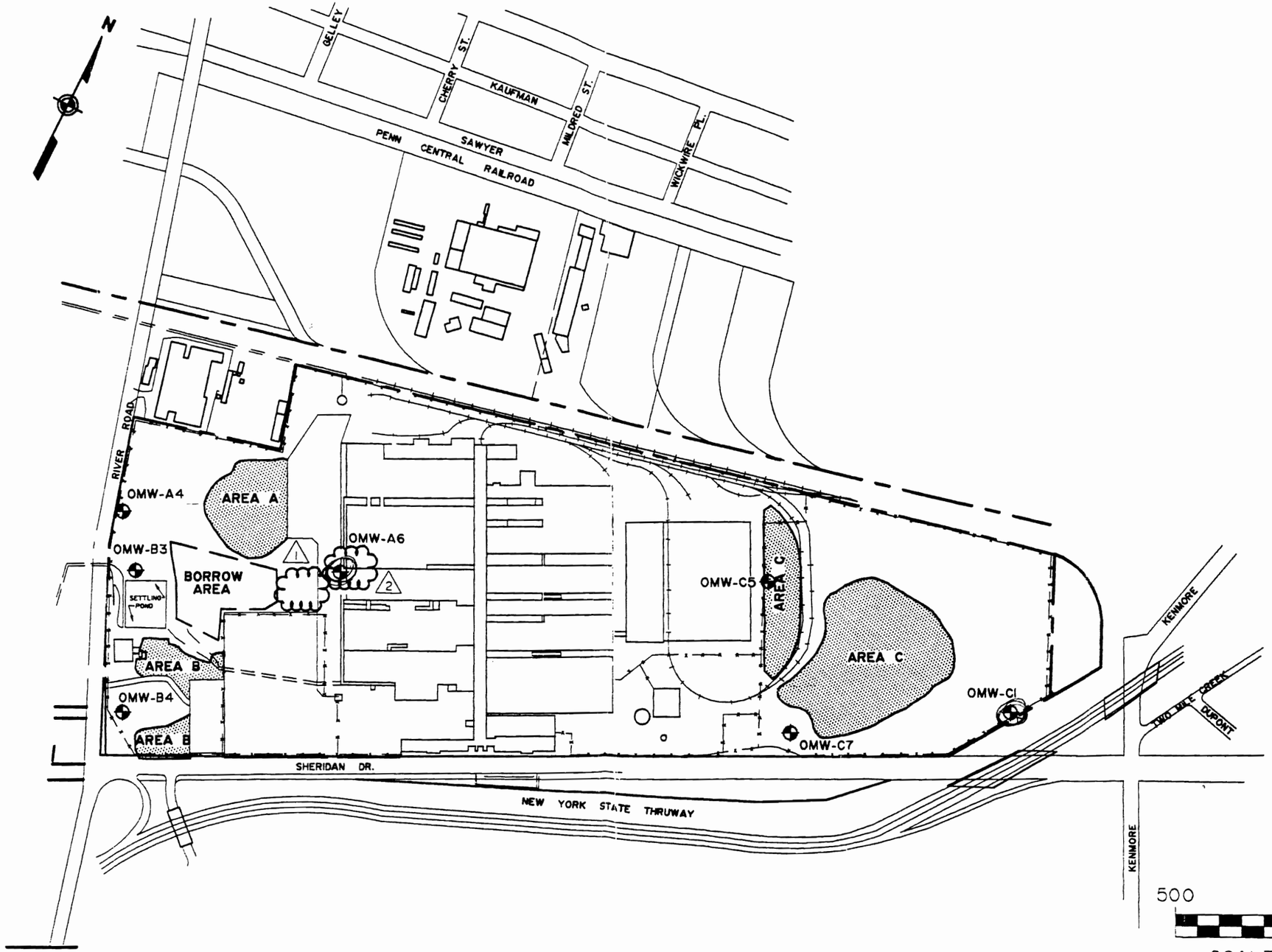
[1] NYSDEC Ambient Water Quality Standards and Guidance values, November 1991

[2] Determined using existing data from OMW-B2



NO.	DATE	DESCRIPTION
2	7/11/94	ADDED OMW-A6
1	5/24/94	DELETED OMW-A5

SAMPLING LOCATION MAP

URS CONSULTANTS, INC.

FIGURE 1

1:500 7/..

CC 2/63A

June 30, 2009

GOODYEAR DUNLOP TIRES, NA LTD
TONAWANDA, NEW YORK
LANDCAP MANAGEMENT
SITE MANAGEMENT PERIODIC REVIEW REPORT (PRR)

I. Introduction

In 1994 a plan was developed to close inactive waste sites at the Goodyear Dunlop Tire, NA Ltd. (GDTNA) located in Tonawanda, New York. Solid waste, rubber and other wastes were consolidated into three separate areas (Areas A, B and C) within the GDTNA site. A monitoring plan was established based upon the results of site investigations. The goal of this plan is to monitor the long term effectiveness of the closure, and provide for early detection should failure occur.

At this time sampling required by the monitoring plan effectively shows that the capped areas are containing these wastes.

GDTNA will continue with the existing plan, until 2024 when we expect a new plan to be issued.

II. Site Overview

Please see the attached site map which shows the location of each of the three capped areas.

III. Evaluate Remedy Performance, Effectiveness, and Protectiveness

N/A – The site does not have any remediation activities at this time.

IV. IC/EC Plan Compliance Report

N/A – The site does not have any engineering controls at this time.

V. Monitoring Plan Compliance Report

The capped areas are inspected on a semi-annual basis and maintenance is performed as needed to ensure cap integrity. Monitoring wells are sampled as per the sampling schedule in Table 1 of the long term monitoring plan. A report

detailing the results obtained from each sampling event is submitted annually for review by the NYSDEC.

VI. Operation & maintenance Plan Compliance Report

N/A

VII. Overall PRR Conclusions and Recommendations

GDTNA continues to meet the annual monitoring requirements set forth by the long term monitoring plan.

VIII. Additional Guidance

Additional guidance regarding the preparation and submittal of an acceptable PRR can be obtained from the Department's Project Manager for the site.

Enclosure 1
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form

Site Details **Box 1**

Site No. **915018**

Site Name ~~**Dunlop Tire and Rubber**~~ GOODYEAR DUNLOP TIRES NORTH AMERICA, LTD.

Site Address: Sheridan Drive and River Road Zip Code: ~~14217~~ 14150

City/Town: Tonawanda

County: Erie

Allowable Use(s) (if applicable, does not address local zoning):

Site Acreage: 25.0

Verification of Site Details **Box 2**

		YES	NO
1.	Are the Site Details above, correct?	☐	☒
	If NO, are changes handwritten above or included on a separate sheet?	☒	
2.	Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment since the initial/last certification?	☐	☒
	If YES, is documentation or evidence that documentation has been previously submitted included with this certification?	☐	
3.	Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property since the initial/last certification?	☐	☒
	If YES, is documentation (or evidence that documentation has been previously submitted) included with this certification?	☐	
4.	If use of the site is restricted, is the current use of the site consistent with those restrictions?	☐	☑
	If NO, is an explanation included with this certification?	☐	
5.	For non-significant-threat Brownfield Cleanup Program Sites subject to ECL 27-1415.7(c), has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid? (N/A)	☐	☐
	If YES, is the new information or evidence that new information has been previously submitted included with this Certification?	☐	
6.	For non-significant-threat Brownfield Cleanup Program Sites subject to ECL 27-1415.7(c), are the assumptions in the Qualitative Exposure Assessment still valid (must be certified every five years)? (N/A)	☐	☐

SITE NO. 915018 **Box 3**

Description of Institutional Controls

Parcel	Institutional Control
S_B_L Image: **65.17-2-1.111**	Decision Document

Box 4

Description of Engineering Controls

Parcel	Engineering Control
S_B_L Image: **65.17-2-1.111**	Cover System Fencing/Access Control

Attach documentation if IC/ECs cannot be certified or why IC/ECs are no longer applicable. (See instructions)

Control Description for Site No. 915018

Parcel: 65.17-2-1.111

In March 1993, a Record of Decision (ROD) was issued for this site. During 1993 and 1994 three on-site landfills were capped with modified Part 360 clay caps that consisted of 18 inches of compacted clay covered with 6 inches of soil. Post-closure maintenance and groundwater monitoring are required to ensure long term effectiveness of the remedy and to provide early detection should failure occur. The site is fenced.

Box 5

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

   a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

   b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and compete.

YES	NO
☒	☐

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

   (a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

   (b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

   (c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

   (d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

   (e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES	NO
☒	☐

3. If this site has an Operation and Maintenance (O&M) Plan (or equivalent as required in the Decision Document);

   I certify by checking "YES" below that the O&M Plan Requirements (or equivalent as required in the Decision Document) are being met. (N/A : MONITORING PLAN)

YES	NO
☒	☐

4. If this site has a Monitoring Plan (or equivalent as required in the remedy selection document);

   I certify by checking "YES" below that the requirements of the Monitoring Plan (or equivalent as required in the Decision Document) is being met.

YES	NO
☒	☐

IC CERTIFICATIONS
SITE NO. 915018

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 2 and/or 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I MARK CRAFT at GOODYEAR DUNLOP TIRES, 10 SHERIDAN DR.
print name print business address

am certifying as ENVIRONMENTAL COORDINATOR (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

M. Craft 6/29/09
Signature of Owner or Remedial Party Rendering Certification Date

IC/EC CERTIFICATIONS

Box 7

QUALIFIED ENVIRONMENTAL PROFESSIONAL (QEP) SIGNATURE

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I MARK CRAFT at 10 SHERIDAN DR.,
print name print business address

am certifying as a Qualified Environmental Professional for the GOODYEAR DUNLOP TIRES CORP

(Owner or Remedial Party) for the Site named in the Site Details Section of this form.

M. Craft 6/29/09
Signature of Qualified Environmental Professional, for the Owner or Remedial Party, Rendering Certification Stamp (if Required) Date