

# Goodyear Dunlop Tires North America, Ltd.



Mr. Brian Sadowski  
New York State Dept. of Environmental Conservation  
270 Michigan Ave.  
Buffalo, NY 14203-2915

June 21, 2011

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

Dear Mr. Sadowski,

Please find the attached analytical results of our annual well testing sampled on 6/2/2011. The wells required to be sampled this year (year 17) are downgradient wells B3, B4, & C7. Downgradient wells A4 & C5 and upgradient wells A6 & C1 are not required to be tested at this time per the Long Term Monitoring Plan. The sample results are below action levels, with the exception of Total Phenols which are reported at the analytical laboratory method detection limit of <0.005 ug/L.

Please also find the results of the semi-annual Landfill Condition Inspections completed on 10/19/2010 & 4/12/2011.

We continue to allow the grass to grow until August 15<sup>th</sup> 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 of the certification forms only.

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

- attach:
1. Semi-annual inspection forms
  2. Lab reports
  3. Site Layout (sample points)
  4. Long-term sampling schedule
  5. Action Levels for Downgradient Wells
  6. Periodic Review Report (with sampling location map)
  7. IC/EC Certification Form

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

File 7.4

Site No.: 915018 A, B & C  
Date of Inspection: 10/19/10

Name of Inspector: Tom Balkin

	Topsoil Erosion Occurring?	Clay Cap Erosion Occurring?	Ditches Free of Obstruction?	Grass Cover Adequate?	Paved Areas Intact?	Note Any Damage.
<b>AREA "B"</b>						
<i>near settling pond</i> Southern Area	N	N	Y	Y		
Northern Area	N	N	Y	Y		
River Road Ditch	N	N	Y	Y		have spots from last inspection now have grass cover
<b>BORROW PIT</b>						
<b>AREA "A"</b> - West of Bldgs #1 & 2						
Central Area	N	N	Y	Y		
Northeast Area	N	N	Y	Y		
<b>AREA "C"</b> <i>near Warehouse</i>						
Outlying Area	N	N	Y	Y		
Major Area	N	N	Y	Y		
Ditch at Toe of Slope	N	N	Y	Y		Debris - outside of landfill
Sheridan Drive Ditch	N	N	Y	Y		
Stockpile Area	N	N	Y	Y		
Warehouse Ditch	N	N	Y	Y		
<b>Paved Areas</b>						
Parking Lot					Y	
Driveway					Y	

**WEATHER CONDITIONS:**  
 Temperature: 54°F  
 Wind Direction: From the East  
 Wind Speed: 4 mph  
 Precipitation Amount: 0"  
 Sky Conditions: partly cloudy  
 Inches of Snow Cover: 0"

**Describe Any Corrective Action Required:**  
 Cleanup debris outside of Landfill. See note on attached map.

**Describe Any Corrective Action Taken:**  
 Bare spots from last inspection now have grass cover.  
 Locks on sampling wells have been replaced since last inspection.  
 Landscaper cut back growth since last inspection.

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

Site No.: 915018 A, B & C

Name of Inspector: Tim Borker

Date of Inspection: 4/12/11

	Topsoil Erosion Occurring?	Clay Cap Erosion Occurring?	Ditches Free of Obstruction?	Grass Cover Adequate?	Paved Areas Intact?	Note Any Damage.
<b>AREA "B"</b>						
<i>near settling pond</i> Southern Area	N	N	Y	Y		
Northern Area	N	N	Y	Y		
River Road Ditch	N	N	Y	Y		
<b>BORROW PIT</b>						
<b>AREA "A"</b>						
Central Area	N	N	Y	Y		
Northeast Area	N	N	Y	Y		
<b>AREA "C"</b>						
Outlying Area	N	N	N	Y		
Major Area	N	N	Y	Y		
Ditch at Toe of Slope	N	N	Y	Y		
Sheridan Drive Ditch	N	N	N	Y		Sheridan Dr. Outfall Plugged
Stockpile Area	N	N	Y	Y		" "
Warehouse Ditch	N	N	Y	Y		
<b>Paved Areas</b>						
Parking Lot					Y	
Driveway					Y	

**WEATHER CONDITIONS:**

Temperature 52°F  
 Wind Direction East Northwest  
 Wind Speed 10 mph  
 Precipitation Amount 0  
 Sky Conditions Mostly Sunny  
 Inches of Snow Cover 0

**Describe Any Corrective Action Required:**

Need to clear Sheridan Drive outfall,

**Describe Any Corrective Action Taken:**

Debris cleared from Sheridan Dr. Outfall

## IsleChem, LLC Analysis Report

Client: Mark Craft  
Goodyear Dunlop Tires NA, Ltd.

Project: Water Samples for Analysis

Well Sampling

PO Box 1109  
Buffalo, NY 14240

Report Date: Tuesday, June 21, 2011

Phase:

Report ID: NY106015.0.24789

Batch:

PO# / Release# 4502216511 /

Contact

Mark Craft

Reference #: Item #00010

Sample Date: Thursday, June 02, 2011

Authorized Signature:

Sample Time: 12:30:00 PM

Richard V. Finn, Manager of Chemical Testing

Report Status: Final - Revised Version

Martin Ruszaj, Director of Chemical Testing

The following result table is for 4 samples received by IsleChem LLC on 06/02/2011 submitted by Client  
Also enclosed is the paperwork submitted with the samples.

**Narrative:**

Analyses were performed within required holding times. All quality control results were within acceptable limits unless specifically noted in the report. Quality control analyses were performed on the samples in this report or samples of similar matrix that were analyzed in the analytical batch on the dates indicated in the report.

**Notes:**

Analyte Group / Method	Analyte	Vessel ID	Results	Units	Analyst	Date
<b>Sample ID</b>	<b>Location / Description</b>					
015-0602-01	Well B3 / Field Grab - Water					
Metals - Goodyear, Soluble (4)		204633				
EPA 200.7 Rev 4.4	Arsenic, Soluble		0.018	mg/L	RVF	2011-06-08
	Cadmium, Soluble		<0.01	mg/L	RVF	2011-06-08
	Chromium, Soluble		<0.01	mg/L	RVF	2011-06-08

IsleChem LLC  
2801 Long Road, Grand Island NY 14072

NYS DOH ELAP ID# 11862  
EPA Lab Code: NY01086

(716) 773-8401 Fax (716) 773-8517  
Project: NY106015.0.24789

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Page: 1 of 7

Analyte Group / Method	Analyte	Vessel ID	Results	Units	Analyst	Date
<b>Sample ID</b>	<b>Location / Description</b>					
015-0602-01	Well B3 / Field Grab - Water					
Metals - Goodyear, Soluble (4)		204633				
EPA 200.7 Rev 4.4	Lead, Soluble		<0.01	mg/L	RVF	2011-06-08
Metals - Goodyear, Total (4)		204632				
EPA 200.7 Rev 4.4	Arsenic, Total		0.022	mg/L	RVF	2011-06-08
	Cadmium, Total		<0.01	mg/L	RVF	2011-06-08
	Chromium, Total		<0.01	mg/L	RVF	2011-06-08
	Lead, Total		<0.01	mg/L	RVF	2011-06-08
		204645				
SM 18-21 2130 B (01)	Turbidity		14.3	NTU	RVF	2011-06-03
	<i>Time of Analysis: 11:00 AM</i>					
Volatiles - Goodyear (5)		204630-204631				
EPA 624	1,2-Dichloroethene (Total)		<2.0	ug/L	KB	2011-06-07
	1,1-Dichloroethane		<2.0	ug/L	KB	2011-06-07
	1,1,1-Trichloroethane		<2.0	ug/L	KB	2011-06-07
	Benzene		<0.7	ug/L	KB	2011-06-07
EPA 8260B	2-Butanone (Methylethyl ketone)		<10.0	ug/L	KB	2011-06-07
		204629				

Analyte Group / Method	Analyte	Vessel ID	Results	Units	Analyst	Date
<b>Sample ID</b> 015-0602-01	<b>Location / Description</b> Well B3 / Field Grab - Water					
		204629				
EPA 420.1 Rev 1978	Phenols		<0.005	mg/L	MF	2011-06-16
		204645				
EPA 120.1 Rev 1982	Specific Conductance		1040	umhos/cm	RVF	2011-06-07
<i>end of Lab ID number 132499</i>						
<b>Sample ID</b> 015-0602-02	<b>Location / Description</b> Well B4 / Field Grab - Water					
Metals - Goodyear, Soluble (4)		204638				
EPA 200.7 Rev 4.4	Arsenic, Soluble		<0.01	mg/L	RVF	2011-06-08
	Cadmium, Soluble		<0.01	mg/L	RVF	2011-06-08
	Chromium, Soluble		<0.01	mg/L	RVF	2011-06-08
	Lead, Soluble		<0.01	mg/L	RVF	2011-06-08
Metals - Goodyear, Total (4)		204637				
EPA 200.7 Rev 4.4	Arsenic, Total		<0.01	mg/L	RVF	2011-06-08
	Cadmium, Total		<0.01	mg/L	RVF	2011-06-08
	Chromium, Total		<0.01	mg/L	RVF	2011-06-08
	Lead, Total		<0.01	mg/L	RVF	2011-06-08
		204646				

Analyte Group / Method	Analyte	Vessel ID	Results	Units	Analyst	Date
<b>Sample ID</b> 015-0602-02	Location / Description Well B4 / Field Grab - Water					
		204646				
SM 18-21 2130 B (01)	Turbidity		0.46	NTU	RVF	2011-06-03
	Time of Analysis: 11:00AM					
Volatiles - Goodyear (5)		204635-204636				
EPA 624	1,2-Dichloroethene (Total)		<2.0	ug/L	KB	2011-06-07
	1,1-Dichloroethane		<2.0	ug/L	KB	2011-06-07
	1,1,1-Trichloroethane		<2.0	ug/L	KB	2011-06-07
	Benzene		<0.7	ug/L	KB	2011-06-07
EPA 8260B	2-Butanone (Methylethyl ketone)		<10.0	ug/L	KB	2011-06-07
		204634				
EPA 420.1 Rev 1978	Phenols		<0.005	mg/L	MF	2011-06-16
		204646				
EPA 120.1 Rev 1982	Specific Conductance		3380	umhos/cm	RVF	2011-06-07
<i>end of Lab ID number 132500</i>						
<b>Sample ID</b> 015-0602-03	Location / Description Well C7 / Field Grab - Water					
		204643				
Metals - Goodyear, Soluble (4)						
EPA 200.7 Rev 4.4	Arsenic, Soluble		<0.01	mg/L	RVF	2011-06-08
	Cadmium, Soluble		<0.01	mg/L	RVF	2011-06-08
IsleChem LLC 2801 Long Road, Grand Island NY 14072	NYS DOH ELAP ID# 11862 EPA Lab Code: NY01086	(716) 773-8401 Project: NY106015.0.24789	Fax (716) 773-8517	www.islechem.com Page: 4 of 7		

Analyte Group / Method	Analyte	Vessel ID	Results	Units	Analyst	Date
<b>Sample ID</b>	Location / Description					
<b>015-0602-03</b>	Well C7 / Field Grab - Water					
Metals - Goodyear, Soluble (4)		204643				
EPA 200.7 Rev 4.4	Chromium, Soluble		<0.01	mg/L	RVF	2011-06-08
	Lead, Soluble		<0.01	mg/L	RVF	2011-06-08
Metals - Goodyear, Total (4)		204642				
EPA 200.7 Rev 4.4	Arsenic, Total		<0.01	mg/L	RVF	2011-06-08
	Cadmium, Total		<0.01	mg/L	RVF	2011-06-08
	Chromium, Total		<0.01	mg/L	RVF	2011-06-08
	Lead, Total		<0.01	mg/L	RVF	2011-06-08
		204647				
SM 18-21 2130 B (01)	Turbidity		0.73	NTU	RVF	2011-06-03
	<i>Time of Analysis: 11:00 AM</i>					
Volatiles - Goodyear (5)		204640-204641				
EPA 624	1,2-Dichloroethene (Total)		<2.0	ug/L	KB	2011-06-07
	1,1-Dichloroethane		<2.0	ug/L	KB	2011-06-07
	1,1,1-Trichloroethane		<2.0	ug/L	KB	2011-06-07
	Benzene		<0.7	ug/L	KB	2011-06-07
EPA 8260B	2-Butanone (Methylethyl ketone)		<10.0	ug/L	KB	2011-06-07



Analyte Group / Method	Analyte	Vessel ID	Results	Units	Analyst	Date
<b>Sample ID</b> 015-0602-03	Location / Description Well C7 / Field Grab - Water					
		204639				
EPA 420.1 Rev 1978	Phenols		<0.005	mg/L	MF	2011-06-16
		204647				
EPA 120.1 Rev 1982	Specific Conductance		3600	umhos/cm	RVF	2011-06-07
<i>end of Lab ID number 132501</i>						
<b>Sample ID</b> 015-0602-04	Location / Description Trip Blank / Trip Blank - DI Water					
Volatiles - Goodyear (5)		204644				
EPA 624	1,2-Dichloroethene (Total)		<2.0	ug/L	KB	2011-06-07
	1,1-Dichloroethane		<2.0	ug/L	KB	2011-06-07
	1,1,1-Trichloroethane		<2.0	ug/L	KB	2011-06-07
	Benzene		<0.7	ug/L	KB	2011-06-07
EPA 8260B	2-Butanone (Methylethyl ketone)		<10.0	ug/L	KB	2011-06-07
<i>end of Lab ID number 132502</i>						

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

*All results for solid samples are reported on a dry weight basis unless otherwise noted.*

*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.*

## Groundwater Monitoring Information Sheet

Site Name: Dunlop Tires  
Date:

Monitoring Well ID: B-4  
Sampling Date: 06/02/11

### Well Structure Data

Evacuation Date: 06/01/11

Water Elevation: \_\_\_\_\_

Top of Inner Casing Elevation: \_\_\_\_\_

Bottom of Well: 22.2'

Monitoring Well Diameter: 2"

Volume of Standing Water:  $17.7 \times .163 = 2.8851$  gallons

Water Level: 4.5'

Volume of Excavated Water: 7 gallons

Appearance/Observations: generally clear throughout

23% recharge

### Well Field Parameter Data

pH - Standard Units: 7.21

Specific Conductance (umhos/cm): \_\_\_\_\_

Temperature - deg F: 58<sup>oc</sup>

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: good

Purging Method: manual bailer

Patrick J. Magerty  
Field Technician Signature

06/02/11  
Date

## Groundwater Monitoring Information Sheet

Site Name: Dunlop Tire  
Date: 06/01-02/11

Monitoring Well ID: C-7  
Sampling Date: \_\_\_\_\_

### Well Structure Data

Evacuation Date: 06/01/11

Water Elevation: \_\_\_\_\_

Top of Inner Casing Elevation: \_\_\_\_\_

Bottom of Well: 23.4'

Monitoring Well Diameter: 2"

Volume of Standing Water  $18.5 \times 1.63 = 3.0155$  gallons

Water Level: 4.9'

Volume of Excavated Water 7.5 gallons

Appearance/Observations: Clear, slightly silty at completion of drilling

30% recharge

### Well Field Parameter Data

pH - Standard Units 7.46

Specific Conductance (umhos/cm) \_\_\_\_\_

Temperature - deg F 58

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 good

Purging Method manual bailer

Patrick J. Magarity  
Field Technician Signature

06/02/11  
Date

## Groundwater Monitoring Information Sheet

Site Name: Dunlop Tire  
Date: 04/01-02/11

Monitoring Well ID: B-3  
Sampling Date: \_\_\_\_\_

### Well Structure Data

Evacuation Date: 09/01/11

Water Elevation: \_\_\_\_\_

Top of Inner Casing Elevation: \_\_\_\_\_

Bottom of Well: 17.1'

Monitoring Well Diameter: 2"

Volume of Standing Water 11.6 x 1.143 = 1.8908 gallons

Water Level: 6.5'

Volume of Excavated Water 6 gallons

Appearance/Observations: slightly stained some particulate 100% recharge

### Well Field Parameter Data

pH - Standard Units 6.78

Specific Conductance (umhos/cm) \_\_\_\_\_

Temperature - deg F 50<sup>oc</sup>

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 good

Purging Method manual bailer

Robert J. Wagner  
Field Technician Signature \_\_\_\_\_ Date \_\_\_\_\_

Organization Name <b>Goodyear Dunlop Tires NA, Ltd.</b>	Project Name <b>Well Sampling</b>	# of Samples / # of Bottles
Street Address <b>PO Box 1109</b>	Client PO / Release #	Turnaround / Data Results Needed
City, State, ZIP <b>Buffalo, NY 14240</b>	Date Sampled <b>06/02/11</b>	<b>1 week</b>
Contact Person <b>Mark Craft</b>	Electronic reporting upon request please provide e-mail below: E-mail: <b>mcrafft@odtna.com</b>	IsleChem Project # <b>NY106015.24789</b>

Sample ID	Sample Location	Matrix	Comp	Grab	Total Rec. Phenol	Vols. Specific *	As, Cd, Cr, Pb	Sol. Metals **	204645	204646	204647	Well B3	Well B4	Well C7	Spec. Cond.	Are RUSH charges		Bottle Type
																Yes	No	
204629	Well B3	Water		X	X													500ml amber (H2So4)
204630 204631	Well B3	Water		X		X												2- 40ml vial (HCL)
204632	Well B3	Water		X			X											500 ml plastic (HNO3)
204633	Well B3	Water		X				X										500 ml plastic (chilled)
204634	Well B4	Water		X	X													500ml amber (H2So4)
204635 204636	Well B4	Water		X		X												2- 40ml vial (HCL)
204637	Well B4	Water		X			X											500 ml plastic (HNO3)
204638	Well B4	Water		X				X										500ml plastic (chilled)
204639	Well C7	Water		X	X													500ml amber (H2So4)
204640 204641	Well C7	Water		X		X												2-40ml vial (HCL)
204642	Well C7	Water		X			X											500 ml plastic (HNO3)
204643	Well C7	Water		X				X										500 ml plastic (chilled)
204644	T					X												40ml vial (HCL)

New B3 → Spec. Cond. Are RUSH charges Tuesday  
 Well B4 → " " " authorized? " "  
 Well C7 → " " " Yes No " "

\*\* Sol. Metals for AS, Cd, Cr, Pb

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

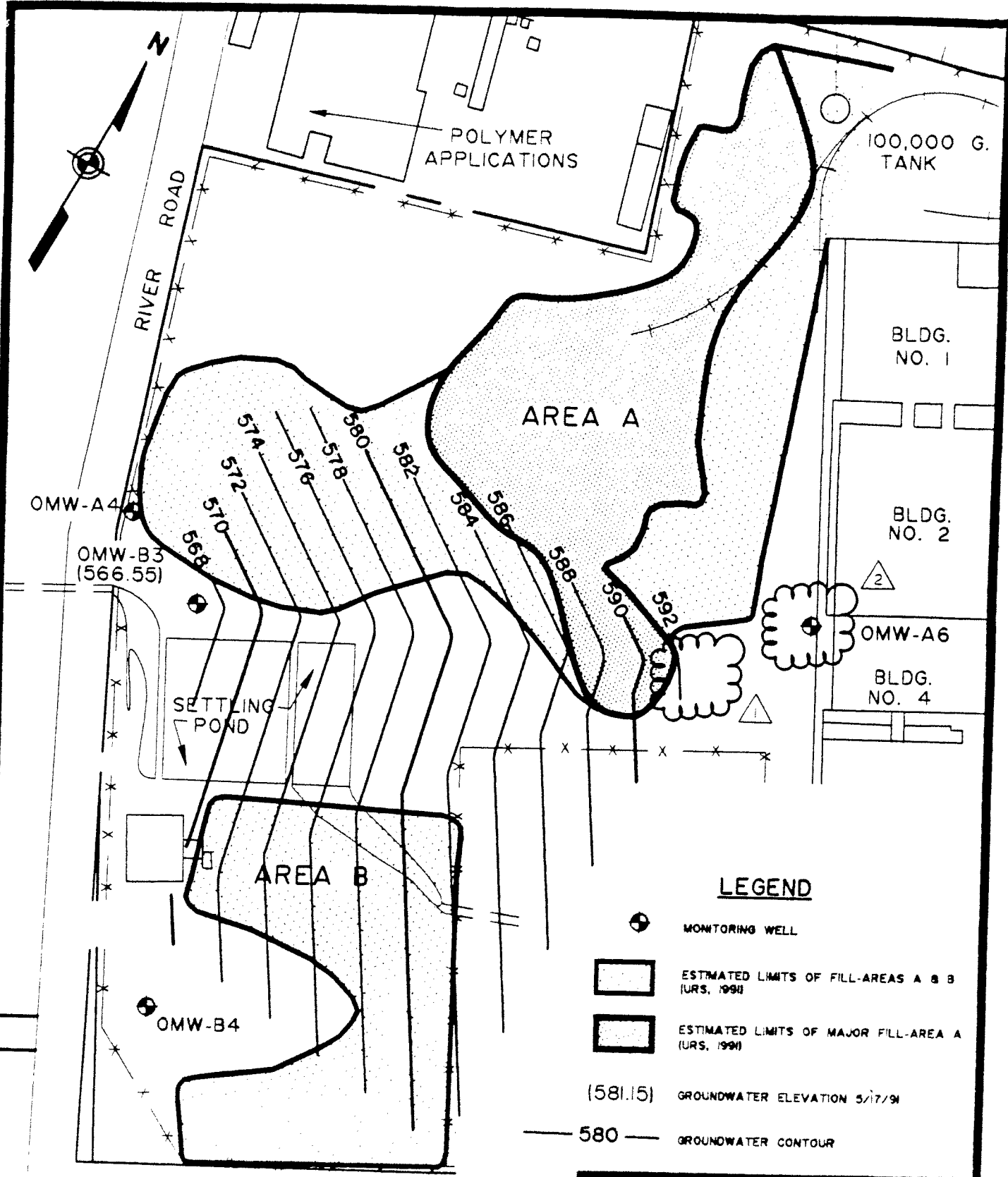
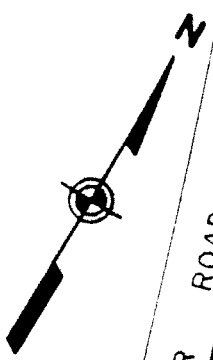
Sampled by <i>Patrick Nagerty</i>	Date <i>06/02/11</i>	Time <i>1230</i>	Received by	Date	Time
Relinquished by <i>Patrick Nagerty</i>	Date <i>06/02/11</i>	Time <i>1425</i>	Received by lab <i>Jeri A. Lader</i>	Date <i>6/2/11</i>	Time <i>2:25 PM</i>

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




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

Chain of Custody

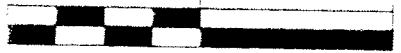
105352461 1:200 7/11/94 2 FLD



**LEGEND**

-  MONITORING WELL
-  ESTIMATED LIMITS OF FILL-AREAS A & B (URS, 1991)
-  ESTIMATED LIMITS OF MAJOR FILL-AREA A (URS, 1991)
- (581.15) GROUNDWATER ELEVATION 5/17/91
- 580 — GROUNDWATER CONTOUR

200 0 200



SCALE IN FEET

NO	DATE	DESCRIPTION
2	7/1/94	ADDED OMW-A6
1	5/24/94	DELETE OMW-A5

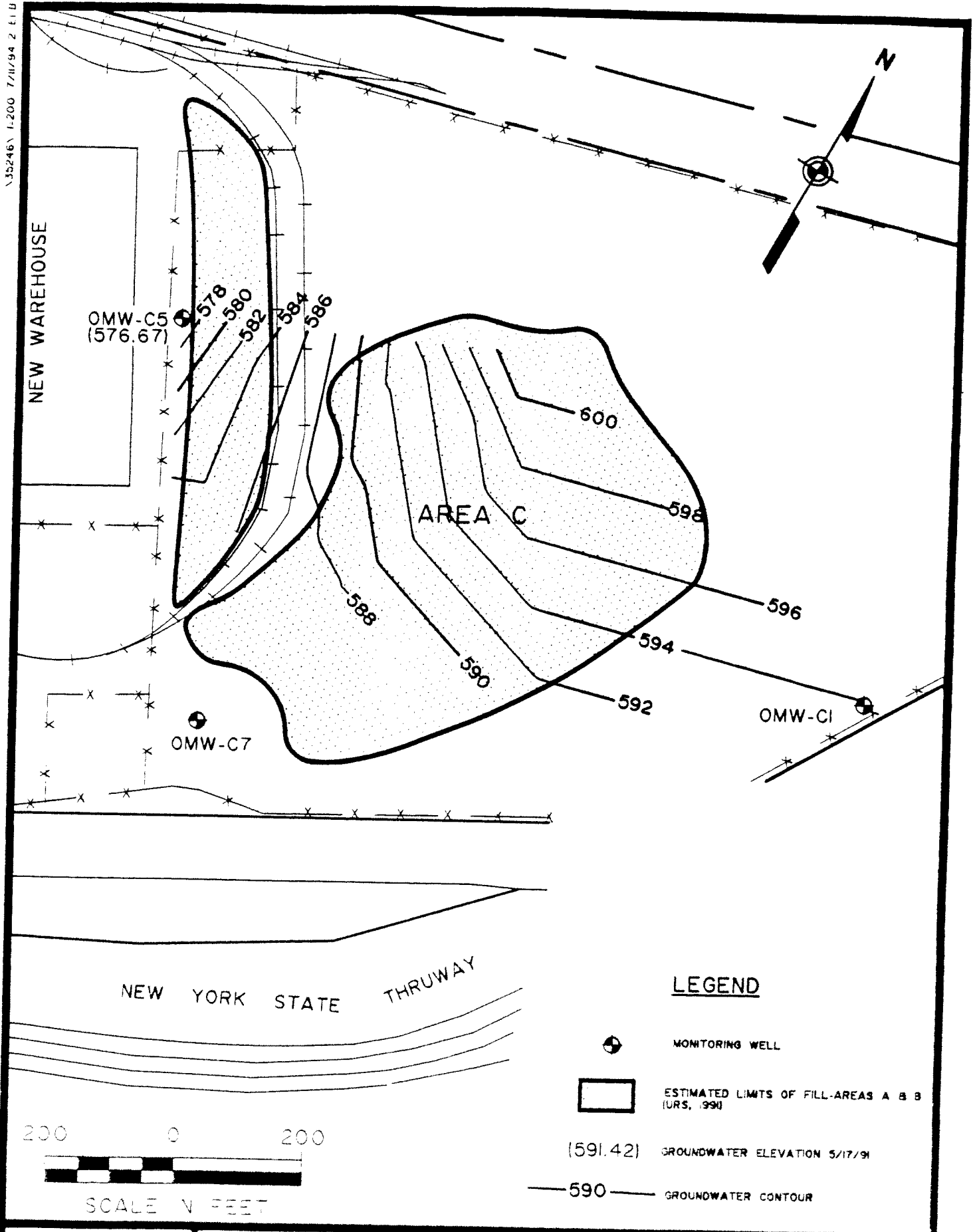
**URS**  
CONSULTANTS, INC.

**LONG TERM MONITORING WELL LOCATIONS  
AREAS A & B**

**FIGURE 2**

AC 461818

35246 \ 1-200 7/11/94 2 EIU



**LEGEND**



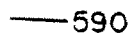
MONITORING WELL



ESTIMATED LIMITS OF FILL-AREAS A & B (URS, 1991)

(591.42)

GROUNDWATER ELEVATION 5/17/91



GROUNDWATER CONTOUR

200 0 200



SCALE IN FEET

**URS**

CONSULTANTS, INC.

**LONG TERM MONITORING WELL LOCATIONS  
AREA C**

**FIGURE 3**

AL 4682A



**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	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
10	B			1	1	1	1	1	Spring
11-14	B			1	1			1	Spring
15	B			1	1	1	1	1	Spring
16-19	B			1	1			1	Spring
20	B			1	1	1	1	1	Spring
21-24	B			1	1			1	Spring
25	B			1	1	1	1	1	Spring
26-29	B			1	1			1	Spring
30	B			1	1	1	1	1	Spring

START 1994  
1<sup>st</sup> year = 1995

Year 9  
2003

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 <sup>1</sup> VALUE (ppb)	OMW-B3 (ppb)	OMW-B4 <sup>2</sup> (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	<i>MET</i>	25	25	25	25	25
Cadmium	<i>MET</i>	10	10	28	16	10
Chromium	<i>MET</i>	50	50	178	66	50
Lead	<i>MET</i>	25	32	52	50	25
Total Phenols	SEMI	1	1	1	1	1

VOC = Volatile Organic Compounds

MET = Metals

SEMI = Semivolatile Organic Compound

<sup>1</sup> NYSDEC Ambient Water Quality Standards and Guidance values, November 1991

<sup>2</sup> Determined using existing data from OMW-B2

**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**

Post closure maintenance and groundwater monitoring of Areas A, B and C ensure that the closures continue to operate effectively.

**IV. IC/EC Plan Compliance Report**

Refer to the Control Description on IC/EC Certification Form.

**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 No. **915018** Site Details Box 1

**Site Name Dunlop Tire and Rubber**

Site Address: Sheridan Drive and River Road      Zip Code: 14150  
 City/Town: Tonawanda  
 County: Erie  
 Site Acreage: 25.0

Reporting Period: June 08, 2010 to June 30, 2011

	YES	NO
1. Is the information above correct?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If NO, include handwritten above or on a separate sheet.

2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))? <i>(No changes to capped landfills.)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? <i>(No permits pertaining to landfills.)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.**

*→ Title: ✓ Renewed 08-10*

5. Is the site currently undergoing development?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**Box 2**

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Closed Landfill	<input checked="" type="checkbox"/>	<input type="checkbox"/>

7. Are all ICs/ECs in place and functioning as designed? <i>Tire Manufacturing not included.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

\_\_\_\_\_  
Signature of Owner, Remedial Party or Designated Representative

\_\_\_\_\_  
Date

SITE NO. 915018

Box 3

**Description of Institutional Controls**

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
65.17-2-1.111	Goodyear Dunlop Tires North America, Ltd	Monitoring Plan O&M Plan

Box 4

**Description of Engineering Controls**

<u>Parcel</u>	<u>Engineering Control</u>
65.17-2-1.111	Cover System Fencing/Access Control

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**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. Other areas were paved for parking and tractor trailer storage. Post-closure maintenance of the cover system 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 and has full time security.

**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 complete.

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

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and  
DO NOT COMPLETE THE REST OF THIS FORM.**

**A Corrective Measures Work Plan must be submitted along with this form to address these issues.**

\_\_\_\_\_  
Signature of Owner, Remedial Party or Designated Representative

\_\_\_\_\_  
Date

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.

*Mark Craft*  
Signature of Owner or Remedial Party Rendering Certification

6/24/11  
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 GOODYEAR DUNLOP TIRES, 10 SHERIDAN DR.  
print name print business address

am certifying as a Qualified Environmental Professional for the GOODYEAR DUNLOP TIRE CO.

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

*Mark Craft*  
Signature of Qualified Environmental Professional, for  
the Owner or Remedial Party, Rendering Certification

Stamp (if Required)

6/24/11  
Date