



716-879-8200



10 Sheridan Drive
Tonawanda, NY 14150



PO Box 4128
Buffalo NY 14217

July 30, 2026

Mr. Bradley Demo
New York State Dept. of Environmental Conservation
270 Michigan Avenue
Buffalo, NY 14203-2915

Periodic Review Report and Institutional Controls Certification - Site No. 915018

Dear Mr. Demo,

Please find attached the Periodic Review Report (PRR) and Institutional and Engineering Controls (IC/EC) Certification Forms for the Dunlop Tire and Rubber Site (Site No. 915018).

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

Thank you,

Christine Barton
Environmental Coordinator
(716) 879-8497

Cc: Ziad Assaad (HFIP).
James Golimowski (HFIP)
Bradley Demo, Project Manager NYSDEC
Ben McPherson, Hazardous Waste Remediation Supervisor, NYSDEC Region 9
Andrew Benkleman, LaBella



Enclosure 2
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

Site Address: 3333 River Road Zip Code: 14150
City/Town: Tonawanda
County: Erie
Site Acreage: 25.000

Reporting Period: June 30, 2025 to June 30, 2026

YES NO

1. Is the information above correct? ☒ ☐

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? ☒ ☐

3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))? ☒ ☐
Hwa Fong Industrial Park, LLC purchased the Site on April 1, 2026 Change of use form dated November 7, 2025 is attached.

4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? ☐ ☒

If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.

5. Is the site currently undergoing development? ☐ ☒

Box 2

YES NO

6. Is the current site use consistent with the use(s) listed below? ☒ ☐
Closed Landfill

7. Are all ICs in place and functioning as designed? ☒ ☐

IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

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

Description of Institutional ControlsParcelOwnerInstitutional Control**65.17-2-1.111**

Sumitomo Rubber USA, LLC

Monitoring Plan
O&M Plan

The March 1993 Record of Decision contained a general Institutional Control described as follows:

- Post-closure maintenance and monitoring for thirty years to ensure the long-term effectiveness of the remedy and provide early detection should failure occur;

and described more specifically as:

- Compliance with this SMP by the Grantor and the Grantor's successors and assigns;
- All Engineering Controls must be operated and maintained as specified in this SMP;
- All Engineering Controls must be inspected at a frequency and in a manner defined in the SMP.
- Groundwater monitoring must be performed as defined in this SMP; and
- Data and information pertinent to Site Management must be reported at the frequency and in a manner defined in this SMP.

There are no use restrictions on this site.

Box 4**Description of Engineering Controls**ParcelEngineering Control**65.17-2-1.111**Cover System
Fencing/Access Control
Monitoring Wells

Three separate landfills are capped with modified 360 caps. Groundwater quality is monitored annually.

Under the requirements of the Order on Consent, Dunlop submitted a Conceptual IRM Closure Plan in November 1992 that detailed the closure of the three landfills. The landfills were closed in accordance with the plan;

Each landfill was capped with eighteen inches of clay compacted to a minimum permeability of 1×10^{-7} cm/sec and covered with six inches of soil amenable to plant growth. Due to the low concentrations of volatile organic compounds detected at the sites, and the absence of volatile readings above background levels during intrusive activities, gas venting systems were not required for any of the landfills. In addition, due to the presence of the impermeable underlying silty clay, groundwater/leachate collection and treatment was not required. Slopes of the final landfill cover systems ranged from approximately 4% to 33%.

There are no demarcation layers between the caps and underlying fill material.

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 Engineering Control 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. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

(a) The 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. Otherwise continue.**

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 1, 2, and 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 James Golimowski at 10 Sheridan Drive Tonawanda, NY 14150
print name print business address

am certifying as Huaxi Fong Industrial Park (Owner) or Remedial Party)

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

[Signature]
Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

7/30/26
Date

EC CERTIFICATIONS

Box 7

Qualified Environmental Professional 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 Andrew Benkleman at 300 Pearl Street, Buffalo, NY (LaBella Associates),
print name print business address

am certifying as a Qualified Environmental Professional for the Owner
(Owner or Remedial Party)


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

Stamp
(Required for PE)

7/29/2026

Date

Hwa Fong Industrial Park, LLC

TONAWANDA, NEW YORK LANDFILL CAP MANAGEMENT SITE MANAGEMENT PERIODIC REVIEW REPORT (PRR)

I. Introduction

The former Goodyear Dunlop Tires North America facility (Facility), now owned and operated by Hwa Fong Industrial Park, LLC (HFIP), is located in Tonawanda, New York (see Figure 1). The Facility was sold to Hwa Fong Industrial Park in April 2026. A copy of the Change of Use Notification is provided in Attachment 1. The Facility is approximately 128 acres in size and consists of two parcels of land addressed as 3333 and 3337 River Road. HFIP manages three historical waste disposal areas located on the 3333 River Road parcel, which together consist of approximately 25 acres. These three historical waste disposal areas are individually referred to as Disposal Site A, B, and C, and are hereinafter collectively referred to as the "Site". Figure 1 shows the approximate Site location and boundaries. Dunlop Tire Corporation (Dunlop) entered into an Order on Consent (Consent Order) on April 23, 1991, with the NYSDEC to determine the nature and extent of contamination at the Site resulting from historical disposal of industrial wastes. The Site boundaries coincide with the estimated limits of fill as depicted by URS Consultants, Inc. in their April 1992 report¹, and as shown in the March 1993 Record of Decision (ROD)². The Site is currently in the New York State (NYS) State Superfund Program (Site No. 915018), which is administered by the New York State Department of Environmental Conservation (NYSDEC). The Site is listed as a Class 4 site, indicating that it has been properly closed but requires continued Site management consisting of operation, maintenance, and/or monitoring.

A Site Management Plan (SMP) has been prepared for the Site to ensure implementation and management of the institutional controls (ICs) and engineering controls (ECs) in place for the Site. This Periodic Review Report (PRR) is being prepared to certify that site management activities are being conducted in accordance with the SMP.

II. Disposal Site Overview

Disposal Site A

Disposal Site A is located on the northwestern portion of the Facility (Figure 1). The surface of Site A consists of grass, trees, brush, and asphalt parking lot. Site A was reportedly used to dispose of various wastes including fly ash, slag, carbon black,

¹ URS Consultants, Inc., April 1992, Report of Field Investigation and Data Analysis, Inactive Disposal Site Nos. 915018 A, B, C, submitted to the NYSDEC.

² New York State Department of Environmental Conservation, March 1993, Record of Decision, Dunlop Tire and Rubber, Site No. 915018A, Site No. 915018B, Site No. 915018C.

asphalt, foam, tires, coal, and construction and demolition (C/D) debris until 1970, and C/D debris until 1979. The primary area of disposal, consisting of thicker fill, is located within the central and northern portions of Site A.

As indicated above, the boundaries of Disposal Site A coincide with the estimated limits of fill as depicted by URS in their April 1992 report (Figure 2). The southern boundary (lateral extent of fill) was determined through excavation of eight test trenches by URS in 1991. The eastern and western boundaries were defined based on surface topography and configuration of waste piles. The northern extent of the fill could not be determined, as the presence of the parking lot prevented completion of test trenches in this area. As a result, the northern boundary was defined by the northwestern corner of Building 1 and a perimeter fence east of a 10,000-gallon water tank present at that time. Fill materials identified in the trenches included black and brown silt, reworked reddish/brown silty clay, ash, slag, carbon black, C/D debris, asphalt, foam, rubber tires, and coal. Three test holes were completed by Conestoga-Rovers & Associates (CRA) in 1983, and two test pits were excavated by URS in 1991, which contributed to the delineation of Disposal Site A.

Disposal Site B

Disposal Site B is located on the southwestern portion of the Facility (Figure 1). The surface of Site B consists of grass and asphalt parking lot and driveway. Site B was reportedly used to dispose of various solid wastes, including scrap rubber (natural and synthetic), golf balls, plastics, carbon black, fly ash, amines, antioxidants, and general refuse until 1970.

The boundaries of Disposal Site B coincide with the estimated limits of fill as depicted by URS in their April 1992 report (Figure 2). The southern and western boundaries (lateral extent of fill) were determined through excavation of seven test trenches by URS in 1991. The eastern extent of the fill could not be determined, as the presence of the parking lot prevented completion of test trenches in this area. However, aerial photographs reportedly confirm waste disposal eastward into the parking lot. The northern extent of the fill could not be determined due to the presence of the settling pond. Fill materials identified in the trenches included black and brown silt, C/D debris, asphalt, coal, and rubber. Seventeen test holes were completed by CRA in 1983, and five test pits were excavated by URS in 1991, which contributed to the delineation of Disposal Site B.

Disposal Site C

Disposal Site C is located on the eastern portion of the Facility (Figure 1). The surface of Site C consists of grass. Site C was reportedly used as a coal ash landfill until 1973. Interviews with several Dunlop retirees in the early 1980s indicated that it was common practice to dispose of all types of waste at this Site, including drums of waste solvents and degreasers.

The boundaries of Disposal Site C coincide with the estimated limits of fill as depicted by URS in their April 1992 report (Figure 3). The southern and eastern boundaries (lateral extent of fill) were determined through excavation of six test trenches by URS in 1991.

The northern boundary was defined by a scarp or steep bank along the outer toe of the fill where it contacted the original surface. The berm-like area between the fence and railroad tracks constituting the western portion of Disposal Site C was defined based on topography. Fill materials identified in the trenches included black and brown silt, ash, slag, sand and gravel, C/D debris, and rubber. Five test holes were completed by CRA in 1983, and six test pits were excavated by URS in 1991, which contributed to the delineation of Disposal Site C.

III. Institutional and Engineering Control Plan

Since remaining contamination exists at the Site, ICs and ECs are required to protect human health and the environment. This IC/EC Plan describes the procedures for the implementation and management of all IC/ECs at the Site.

Institutional Controls

A series of ICs are required by the ROD to:

1. Implement, maintain and monitor EC systems
2. Prevent future exposure to remaining contamination

Adherence to these ICs on the Site is required by the ROD and the Consent Order and will be implemented under the Site's Long-Term Monitoring Plan. ICs may not be discontinued without an amendment to the Consent Order. The IC boundaries are the same as the Site boundaries.

The ICs, as described in the March 1993 ROD, consist of the following:

- Post-closure maintenance and monitoring will be conducted for 30 years, starting in 1995, to ensure the long-term effectiveness of the remedy and provide early detection should failure occur. This 30-year maintenance and monitoring program concluded with the 2024 round of inspections and monitoring.
- The Order on Consent signed by Dunlop, effective April 23, 1991, is a legally binding agreement that requires the company to inspect the final cover quarterly (the frequency has been reduced to annually) and maintain it for 30 years. This maintenance program, in combination with the post-closure monitoring program, will help ensure the long-term effectiveness of the cap. If during that time the Department concludes that any element of the cover fails to perform as predicted or otherwise fails to protect human health or the environment, the Department can require HFIP to make modifications or repairs as required.
- If HFIP closes the Facility, the Order on Consent requires the company to continue its maintenance and monitoring programs.
- If the property is sold, HFIP must notify the Department within 60 days of closing and furnish the name(s) of the prospective new owner(s) of the property. In addition, HFIP must inform the new owner(s) about the landfills and that an Order on Consent is in effect.

Engineering Controls

The purpose of the ECs is to prevent direct human contact with on-Site waste, prevent the erosion and transport of contaminated soil from the Site into surrounding wetland areas, control the migration of contaminated groundwater from the Site, and reduce environmental risk to wildlife living in the surrounding wetlands. The ECs, as described in the March 1993 ROD, include the following:

- The three landfills were capped with 18 inches of clay compacted to a minimum permeability (hydraulic conductivity) of 1×10^{-7} cm/sec. The caps were covered with 6 inches of soil amenable to plant growth, seeded, and mulched. Areas overlying the three landfills associated with vehicle traffic were paved in the fall of 1992.
- Surface water runoff is directed to catch basins that discharge to the plant settling pond. Monitoring of this pond occurs semi-annually as a SPDES permit condition.
- The Site is fenced.

The Site cap is a permanent control, and the quality and integrity of the cap is inspected annually.

IV. Inspections and Monitoring Activities

Annual Cap Inspection

The cap at the Site is intended to prevent contact between Site visitors and workers and the remaining contamination. The cap consists of low permeability clay covered by soil capable of sustaining vegetation, and by areas of asphalt pavement over portions of the Site subject to vehicle traffic (no confirmed clay cap). An inspection of the cap at all three disposal Sites is performed on an annual basis in accordance with the SMP schedule, regardless of the frequency of the Periodic Review Report (PRR).

Each cap inspection includes a walkover and visual assessment of the cap. The inspection does not include any areas where work is being performed. The following items are evaluated to ascertain the need for corrective action:

- Soil cover system – The presence of desiccation cracks, freeze/thaw damage, and the presence of seeps or leachate breakouts.
- Asphalt – The quality of the pavement for cracking or other deterioration.
- Landscaping – The vigor and density of the vegetative cover both on the cap and in grass-lined drainage ways as well as bare, sparse, and undernourished areas.
- Erosion – The presence of any erosion.
- Settlement – Visual evidence of differential settlement and its impact on either the cap integrity or required drainage patterns.
- Drainage features – Ditches, culverts, piping, and structures for siltation, ponding, or erosion damage.
- Ancillary features – The integrity of other remedial action features such as fences and access roads and any items in need of repair.

The annual cap inspection was completed on July 17, 2026. The inspection forms are provided in Attachment 2.

No issues were identified during the inspection that require any corrective action at this time.

Photos from the July 2026 inspection are provided as Attachment 3.

Groundwater Monitoring

Groundwater monitoring is performed triennially to monitor the long-term effectiveness of the Site closure and provide for early detection should failure occur, as outlined in the SMP. Trends in contaminant concentrations in groundwater are evaluated to determine if the ICs and ECs in place at the Site continue to be effective in protecting public health and the environment. Wells downgradient of the capped areas are monitored to evaluate the effectiveness of the closure action. Wells upgradient of the capped areas will be monitored as needed, based on the downgradient results, to determine if upgradient groundwater, rather than the disposal areas, might be a source of downgradient impacts. In this case, the effectiveness of the closure would not be questioned.

The Groundwater monitoring well network includes the following three wells (Figures 2 and 3):

- Downgradient wells: OMW-B3, OMW-B4, and OMW-C7

Contaminants to be analyzed during each sampling event are defined as Analytical Schedule A analytes and Analytical Schedule B analytes and are listed on Table 1.

If turbidity in a groundwater sample is above 50 nephelometric turbidity unit (NTU), then both filtered and unfiltered samples are analyzed for metals to determine if suspended solids are contributing to the reported concentrations and, therefore, potentially giving a false indication of groundwater concentrations.

No Groundwater sampling was required in 2026.

No corrective actions are required at this time.

Visual Inspections of Monitoring Wells

All seven monitoring wells will be visually inspected as part of the triennial monitoring event, regardless of which wells are to be sampled. The wells are inspected for protective covers, well locks, water-tight locking caps, and cement pads or flush mount conditions.

Groundwater sampling was not required in 2026.

No corrective actions are required.

Hydraulic Monitoring

Groundwater/hydraulic monitoring was not required in 2026.

V. Compliance and Corrective Actions

No issues of non-compliance were noted during this reporting year. Routine maintenance of pavement and the soil cover will continue as needed.

There are no corrective actions required based on the current conditions.

The next landfill cap inspection will be completed in Spring 2027, while the next monitoring well inspection, hydraulic monitoring, and groundwater sampling event will be completed in Spring 2028. The NYSDEC will be notified 7 days in advance of future inspections or sampling activities.

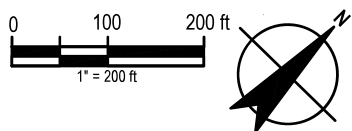
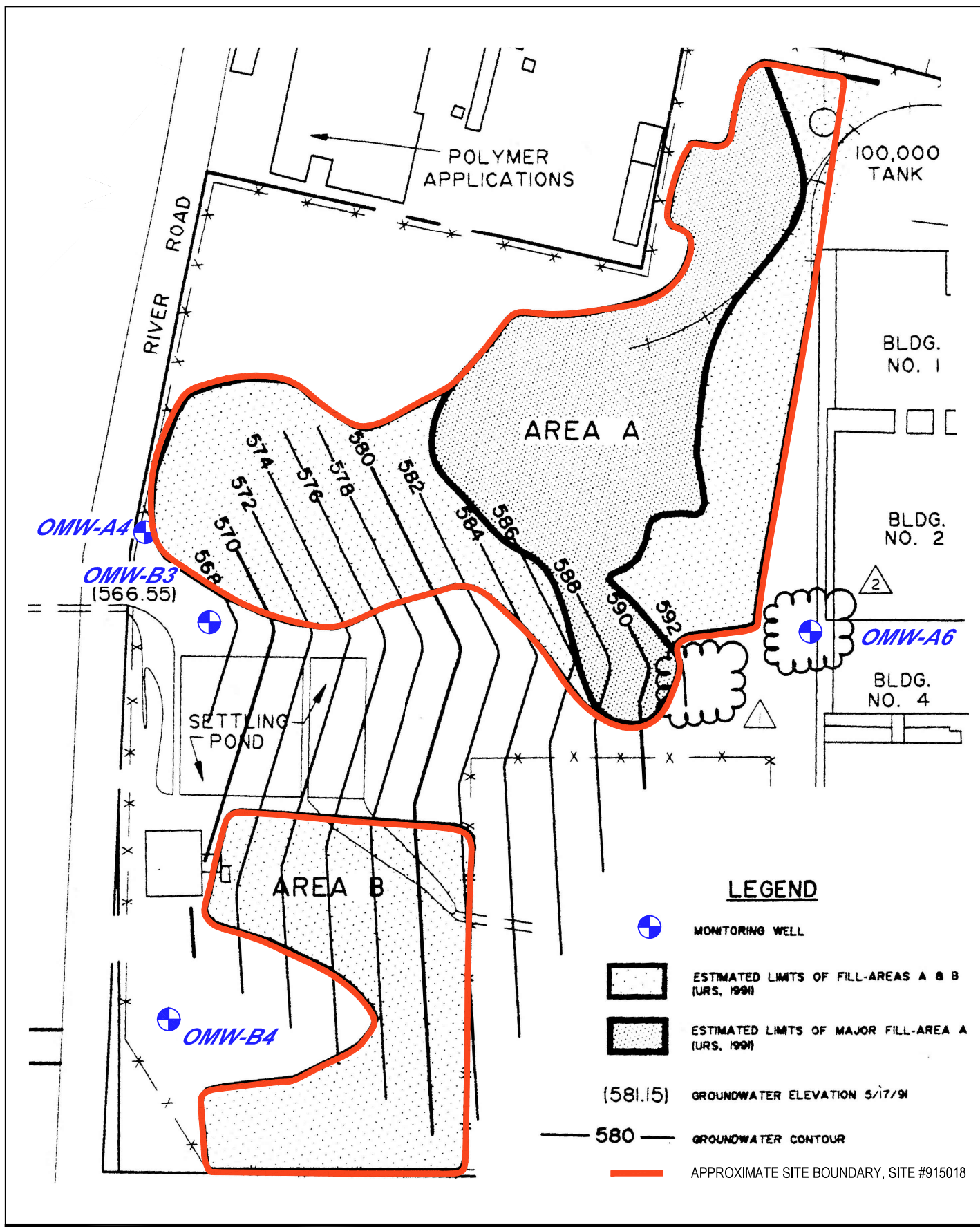
Figures

- ⊕ BEYPOCK MONITORING WELL LOCATIONS (CRA, 1983)
- 1982 AES SOIL SAMPLE LOCATIONS
- 1985 AES GROUNDWATER SAMPLE LOCATIONS
- ⊙ OVERBURDEN MONITORING WELL LOCATIONS (CRA, 1983)
- 1982 AES SOIL SAMPLE LOCATIONS
- 1985 AES GROUNDWATER SAMPLE LOCATIONS
- ⊖ OVERBURDEN MONITORING WELL LOCATIONS (URS, 1991)
- TEST PIT LOCATION (URS, 1991)
- TEST TRENCH LOCATION (URS, 1991)
- SURFACE SEDIMENT LOCATION (URS, 1991)
- ESTIMATED LIMITS OF FILL (URS, 1991)
- ESTIMATED LIMITS OF MAJOR FILL (URS, 1991)
- A CROSS SECTION LOCATION
- APPROXIMATE SITE BOUNDARY, SITE #915018
- APPROXIMATE BOUNDARY, FORMER GOODYEAR
DUNLOP TIRE NORTH AMERICA FACILITY



SITE PLAN

FIGURE 1

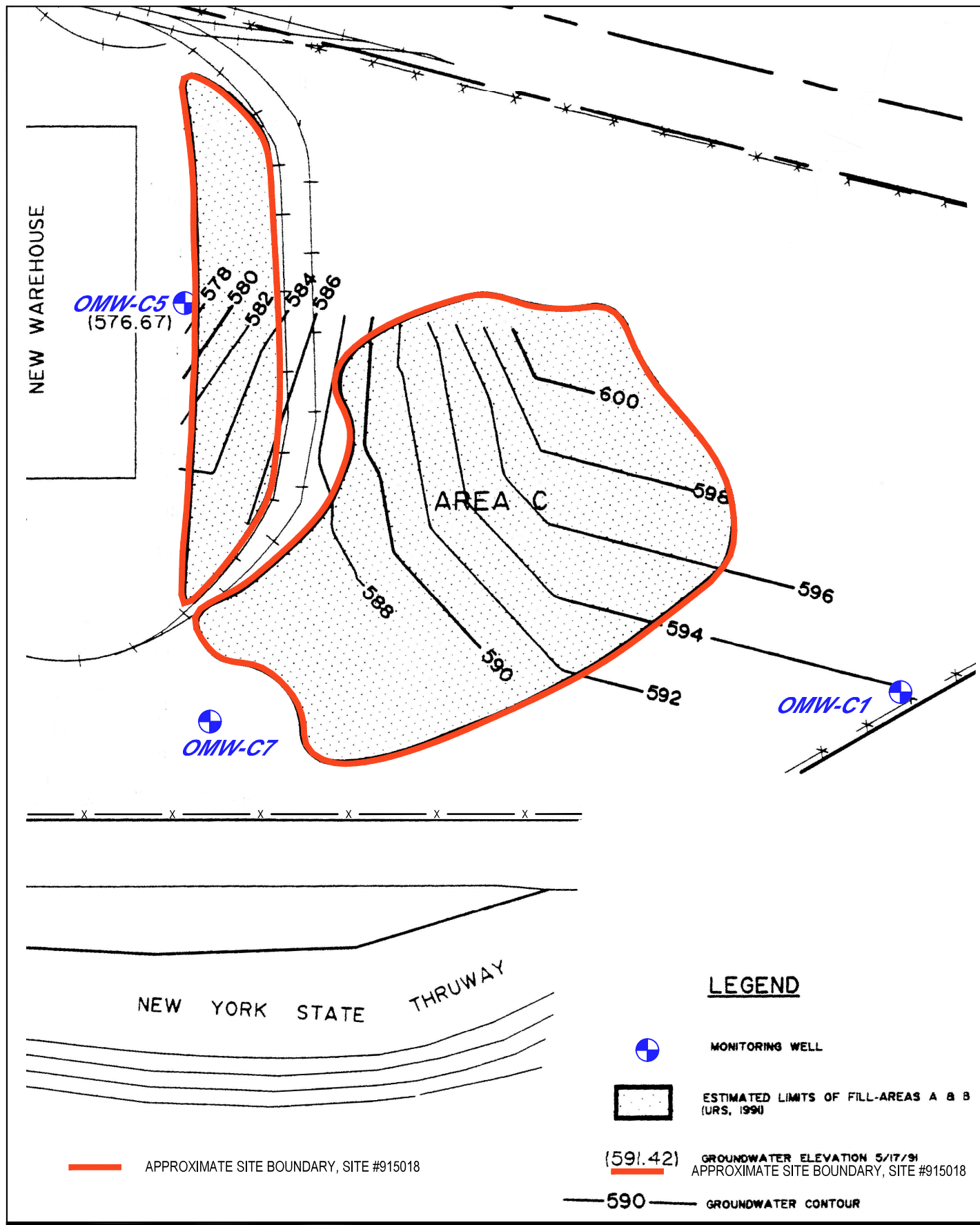


DUNLOP TIRE AND RUBBER SITE, SITE #915018
3333 RIVER RD TONAWANDA, NEW YORK
SITE MANAGEMENT PLAN

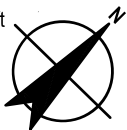
LOCATIONS OF WELLS FOR
LONG-TERM MONITORING
DISPOSAL SITES A AND B

Project No. 11222959
Date July 2025

FIGURE 2



0 100 200 ft
1" = 200 ft



DUNLOP TIRE AND RUBBER SITE, SITE #915018
3333 RIVER RD TONAWANDA, NEW YORK
SITE MANAGEMENT PLAN

LOCATIONS OF WELLS FOR
LONG-TERM MONITORING
DISPOSAL SITE C

Project No. 11222959
Date July 2025

FIGURE 3

Attachment 1

Change of Use Notification



Department of
Environmental
Conservation

60-Day Advance Notification of Site Change of Use

Physical Alteration, Transfer of Certificate of Completion, and/or Ownership Required by 6NYCRR Part 375-1.11(d) and 375-1.9(f)

SUBMITTAL INSTRUCTIONS:

Please submit via Site Control Dropbox as described below, OR, if file size permits, by email to DERSiteControl@dec.ny.gov.

You may submit your document(s) via ground mail at the address below however please – DO NOT submit both electronic and ground mail.

a.) VIA SITE CONTROL DROPBOX:

Request an Invitation

In the "Title" field, please include the following: "Change of Use – Site Name, Site # _____".

After uploading files, an automated email will be sent to the submitter's email address with a link to verify the status of the submission. Please do not send a separate email to confirm receipt.

Packages submitted through third-party file transfer services will not be accepted.

b.) VIA GROUND MAIL:

Save the COU form w/attached file(s) and cover letter (optional) to an external storage device (e.g., thumb drive, flash drive). Do NOT include any paper.

Mail the external storage device to the following address:

Chief, Site Control Section
Division of Environmental Remediation
625 Broadway, 12th Floor
Albany, NY 12233-7020

Section I: Property Information

Site Name: Dunlop Tire and Rubber Site

DEC Site #915018

Site Address: 3333 River Road Tonawanda, NY 14150

Section II: Contact Information Person Submitting Notification

Name: Christine Barton

Address 1: 10 Sheridan Drive Tonawanda, NY 14150

Address 2:

Phone: 716-879-8497

E-mail: christine.barton@hf-ip.com

Section III: Type of Change and Date

- ☒ Change of Ownership
☐ Change of Remedial Parties
☐ Transfer of Certificate of Completion
☐ Other (e.g., any physical alteration or other change of use)

Proposed Date of Change (mm/dd/yyyy)

Section IV: Description of Proposed Change (Required)

Please provide a brief narrative of the proposed changes(s) indicated above. Attach maps, drawings, and/or parcel information as needed. If "other" the description must explain and advise the DEC how such change may or may not affect the site's proposed, ongoing, or completed remedial program (attach additional sheets if needed).

A purchase agreement has been signed between Sumitomo Rubber USA (SRUSA) and Hwa Fong Rubber Ind. Co. Ltd. (HFR) for the purchase of the Site. At the time of closing a new subsidiary of HFR will be formed, HF Industrial Park (HF-IP). The Site will be under the control of HF-IP.

Section V: Certification Statement

Where the change results in a change in ownership or in responsibility for the proposed, ongoing, or completed remedial program for the site, the following certification must be completed (by owner or designated representative: see § 375-1.11(d)(4)(i):

I hereby certify that the prospective purchaser and/or remedial party has been provided a copy of any order, agreement, Site Management Plan, or State Assistance Contract regarding the Site's remedial program as well as a copy of all approved remedial work plans and reports.

Name: _____

(Signature)

Nov. 7, 2025

(Date)

Glenn Leonardi

(Print Name)

Address1: 10 Sheridan Drive Tonawanda, NY 14150

Address2: _____

Phone: 716-879-8505 Email: glenn_leonardi@sumitomorubber-usa.com

Section VI: Contact Information for New Owner, Remedial Party, or CoC Holder

If the site will be sold or there will be a new remedial party, identify the prospective owner(s) or party(ies) along with contact information. If the site is subject to an Environment Easement, Deed Restriction, or Site Management Plan subject to periodic certification of institutional controls/engineering controls (IC/ECs), indicate who will be the certifying party (attach additional sheets if needed).

☒ Prospective Owner ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: HF Industrial Park - Ziad Assaad

Address:1 10 Sheridan Drive Tonawanda, NY 14150

Address2: _____

Phone: 716-510-6652 Email: ziad.assaad@hf-ip.com

Cert. Party Name: GHD

Address:1 285 Delaware Ave Buffalo, NY 14202

Address2: _____

Phone: 716-856-2142 Email: richard.snyder@ghd.com

Section VII: Agreement to Notify DEC After Transfer

If Section VI applies, i.e., all or part of the site will be sold, in accordance with § 375-1.11(d)(4)(ii) 30 days after the transfer a letter to notify the DEC of the completion of the transfer must be provided. If the current owner is also the CoC holder for the site, the CoC should be transferred to the new owner using DEC's approved "Notice of Transfer of COC" forms found at [Initial Notice And Transfer Of Certificate Of Completion - NYSDEC](#). This form has its own filing requirements at §375-1.9(f).

Signing below indicates that theses notices will be provided to the DEC within the specified timeframes as follows:

Within 30 days of the sale of the site, I agree to submit to the DEC:

1. The name and contact information for the new owner(s) per §375-1.11(d)(4)(ii)
2. The name and contact information for any owner representative; and
3. A Notice of Transfer using the DEC form [Initial Notice And Transfer Of Certificate Of Completion - NYSDEC](#).

Name: 
(Signature)

11/7/2025
(Date)

Ziad Assaad

(Print Name)

Address1: 10 Sheridan Drive Tonawanda, NY 14150

Address2: _____

Phone: 716-510-6652 Email: ziad.assaad@hf-ip.com

Continuation Sheet (if needed for multiple owners, representatives, or remedial parties)

☐ Prospective Owner ☐ Prospective Remedial Party ☒ Prospective Owner Representative

Name: Christine Barton

Address:1 10 Sheridan Drive Tonawanda, NY 14150

Address2: _____

Phone: 716-879-8497 Email: christine.barton@hf-ip.com

☐ Prospective Owner ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: _____

Address:1 _____

Address2: _____

Phone: _____ Email: _____

☐ Prospective Owner ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: _____

Address:1 _____

Address2: _____

Phone: _____ Email: _____

☐ Prospective Owner ☐ Prospective Remedial Party ☐ Prospective Owner Representative

Name: _____

Address:1 _____

Address2: _____

Phone: _____ Email: _____

Attachment 2

Site Inspection Forms

Weather Conditions		APPENDIX I SUMITOMO RUBBER USA, LLC LANDFILL CONDITION – SEMI-ANNUAL INSPECTION REPORT	Date: 7/17/20
Temperature	70		Inspector: CMB/AB DEO -00011/1
Wind Direction/speed	5W		
Precipitation Amount	0		
Sky conditions	clear		
Inches of Snow Cover	0		

	BORROW PIT AREA "A"		AREA "C"	
	Central Area	Northeast Area	Outlying Area	Major Area
Topsoil Erosion Occurring	NO	NO	NO	NO
Clay Cap Erosion Occurring	NO	NO	NO	NO
Desiccation Cracks or Freeze/Thaw Damage Present	NO	NO	NO	NO
Any Seeps or Leachate Breakouts Present	NO	NO	NO	NO
Ditches Free of Obstruction	yes	7		
Any Siltation, Ponding, or Erosion Damage in Drainage Features	NO	NO	NO	NO
Grass Cover Adequate	yes	yes	yes	yes
Any Bare, Sparse or Undernourished Areas Present	NO	NO	NO	NO
Any Settlement Observed in Cover System	NO	NO	NO	NO
Paved Areas Intact	NA	yes	NA	NA
Any Cracking, Deterioration, or Settlement in Pavement	NA	NO	NA	NA
Note Any Damage	None	None	None	None

Describe any issues with ancillary features in this area (e.g., fencing, access)

Management or Maintenance Activities Occurring during Inspection:
Describe any corrective actions required:
Describe any corrective actions taken:

Weather Conditions		APPENDIX I SUMITOMO RUBBER USA, LLC LANDFILL CONDITION – SEMI-ANNUAL INSPECTION REPORT	Date: 7/17/20
Temperature	70		Inspector: CMB/AB DEO -00011/1 Labelle
Wind Direction/speed	0-5 W		
Precipitation Amount	0		
Sky conditions	clear		
Inches of Snow Cover	0		

AREA B				
	Southeast Area	Southern Area	Northern Area	River Rad Ditch
Topsoil Erosion Occurring	NO	NO	NO	NO
Clay Cap Erosion Occurring	NO	NO	NO	NO
Desiccation Cracks or Freeze/Thaw Damage Present	NO	NO	NO	NO
Any Seeps or Leachate Breakouts Present	NO	NO	NO	NO
Ditches Free of Obstruction	yes	yes	yes	yes
Any Siltation, Ponding, or Erosion Damage in Drainage Features	NO	NO	NO	NO
Grass Cover Adequate	yes	yes	yes	yes
Any Bare, Sparse of Undernourished Areas Present	NO	NO	NO	NO
Any Settlement Observed in Cover System	NO	NO	NO	NO
Paved Areas Intact	yes	NA	NA	NA
Any Cracking, Deterioration, or Settlement in Pavement	NO	NA	NA	NA
Note Any Damage	None	None	None	None

Describe any issues with ancillary features in this area (e.g., fencing, access)

Management or Maintenance Activities Occurring during Inspection:	None
Describe any corrective actions required:	None
Describe any corrective actions taken:	None
Are site records up-to-date – yes no Describe deficiencies	yes - Labelle will update SMP

Weather Conditions		APPENDIX I SUMITOMO RUBBER USA, LLC LANDFILL CONDITION – SEMI-ANNUAL INSPECTION REPORT	Date: 7/17/20
Temperature	70		Inspector: CMB/AB DEO -00011/1 LaBella
Wind Direction/speed	05 W		
Precipitation Amount			
Sky conditions	Clear		
Inches of Snow Cover	0		

Are site records up-to-date – yes no Describe deficiencies LaBella will update SMP				
	AREA "C"			
	Ditch at Toe of Slope	Sheridan Dr. Ditch	Stockpile Area	Warehouse Ditch
Topsoil Erosion Occurring	NO	NO	NO	NO
Clay Cap Erosion Occurring	NO	NO	NO	NO
Desiccation Cracks or Freeze/Thaw Damage Present	NO	NO	NO	NO
Any Seeps or Leachate Breakouts Present	NO	NO	NO	NO
Ditches Free of Obstruction	yes	yes	yes	yes
Any Siltation, Ponding, or Erosion Damage in Drainage Features	NO	NO	NO	NO
Grass Cover Adequate	yes	yes	yes	yes
Any Bare, Sparse or Undernourished Areas Present	NO	NO	NO	NO
Any Settlement Observed in Cover System	NO	NO	NO	NO
Paved Areas Intact	NA	yes	NA	NA
Any Cracking, Deterioration, or Settlement in Pavement	NA	NO	NA	NA
Note Any Damage	None			
Describe any issues with ancillary features in this area (e.g., fencing, access)				
Management or Maintenance Activities Occurring during Inspection: None				

Weather Conditions		APPENDIX I SUMITOMO RUBBER USA, LLC LANDFILL CONDITION – SEMI-ANNUAL INSPECTION REPORT	Date:
Temperature			Inspector: DEO -00011/1
Wind Direction/speed			
Precipitation Amount			
Sky conditions			
Inches of Snow Cover			

Describe any corrective actions required:
None

Describe any corrective actions taken:
None

Are site records up-to-date – yes no

Describe deficiencies *LaBella will update SMP*

	Pave Areas			
	Parking Lot	Driveway		
Topsoil Erosion Occurring				
Clay Cap Erosion Occurring				
Desiccation Cracks or Freeze/Thaw Damage Present				
Any Seeps or Leachate Breakouts Present				
Ditches Free of Obstruction				
Any Siltation, Ponding, or Erosion Damage in Drainage Features				
Grass Cover Adequate				
Any Bare, Sparse or Undernourished Areas Present				
Any Settlement Observed in Cover System				
Paved Areas Intact	<i>Yes</i>	<i>Yes</i>		
Any Cracking, Deterioration, or Settlement in Pavement	<i>NO</i>	<i>NO</i>		
Note Any Damage	<i>None</i>	<i>None</i>		

Describe any issues with ancillary features in this area (e.g., fencing, access)

Attachment 3

Site Photographs

Attachment 3



Area A Facing Northwest



Area A Facing North



Area B Facing West



Area B Facing West



Area C Facing East



Area C Facing Northeast