FRONTIER TECHNICAL ASSOCIATES INC.

PERIODIC REVIEW REPORT (PRR)

INACTIVE LANDFILL AREA

SAINT GOBAIN ABRASIVES, INC.

St. Gobain Abrasives Division
Site No. 932007
6600 Walmore Road
Wheatfield NY 14304

FTA Report ET-14-703PRR

April 9, 2014

Prepared For:

Mr. Douglas M. Wright
Saint Gobain Abrasives, Inc.
P.O. Box 301
(6600 Walmore Road)
Niagara Falls, NY 14304

Prepared By:

Frontier Technical Associates, Inc.
8675 Main Street
Williamsville, NY 14221

This report was prepared at the request of and for the use of Saint Gobain Abrasives, Inc. management use only, and except for required regulatory compliance reporting, is not intended for any other purpose. This report updates previously submitted information and reflects no change in the data.

INTRODUCTION

In response to the requirements of NYSDEC (6 NYCRR 375-1.2), Saint Gobain Abrasives, Inc. has requested that Frontier Technical Associates, Inc. complete documentation of site activities and site characteristics of the former Carborundum Abrasives Inactive Landfill Site (932007). This site was capped in 1981 and since that time inspections and groundwater sampling and analysis for the landfill area located on the southwest corner of the property in Wheatfield, NY have been completed. Figure 1 is a *sketch* of the landfill area showing the location of the monitoring wells which were installed in 1981 and the location of the "A" storm sewer line (West Branch) (see NFTA security fence installed in 2004). Figure 1 A is an *aerial photo* of the area with the fence installed. Frontier Technical Associates, Inc. has completed much of the monitoring and site activities since that time, and has periodically submitted inspection and monitoring reports to the NYSDEC documenting these activities. FTA had prepared technical reports describing sampling and analytical results for 1991. The NYSDEC subsequently reduced monitoring parameters for 1992. For 1993, the NYSDEC deleted the requirement for analysis of unfiltered groundwater for metals, and for 1994, all metals requirements were deleted and turbidity was added for informational purposes. After the 1997 monitoring episode, SGC requested and received approval to monitor these wells every two years. The requirement for quarterly inspections of the wells was eliminated by the NYSDEC in 2012. A regularly scheduled bi-annual sampling event took place in 2013.

Since 1982, the monitoring wells and adjacent catch basin were sampled for pH and total phenolics (4AAP). In the period 1982-1988, there were no detectable levels of phenolics in monitoring wells OW2-81 through OW5-81. However, in 1989, perhaps as the result of unusual spring and summer precipitation events, low levels of phenolics (4AAP) were detected in the monitoring wells and adjacent catch basins. Again in 1990, low levels of total phenolics were detected using the same method. This resulted in the NYSDEC's desire to obtain additional data for evaluation beginning in 1991. Based upon the 1991 results, Well OW1-81 was decommissioned because it had fallen into disrepair and was no longer functioning to monitor the *interior* of the landfill. The request was approved by the NYSDEC and implemented on September 27, 1991. The phenolic compound analytical methodology was also changed to the more accurate and specific EPA Method 8270. The former method (4AAP) is subject to interferences (colorimetric method) typically yielding false positive results. It was deemed inappropriate for monitoring at this site.

This report outlines the approach used to fulfill the NYSDEC requirements for 2013 in connection with the Site Management Periodic Review request. This report covers the period from January 1, 2013 to December 31, 2013.

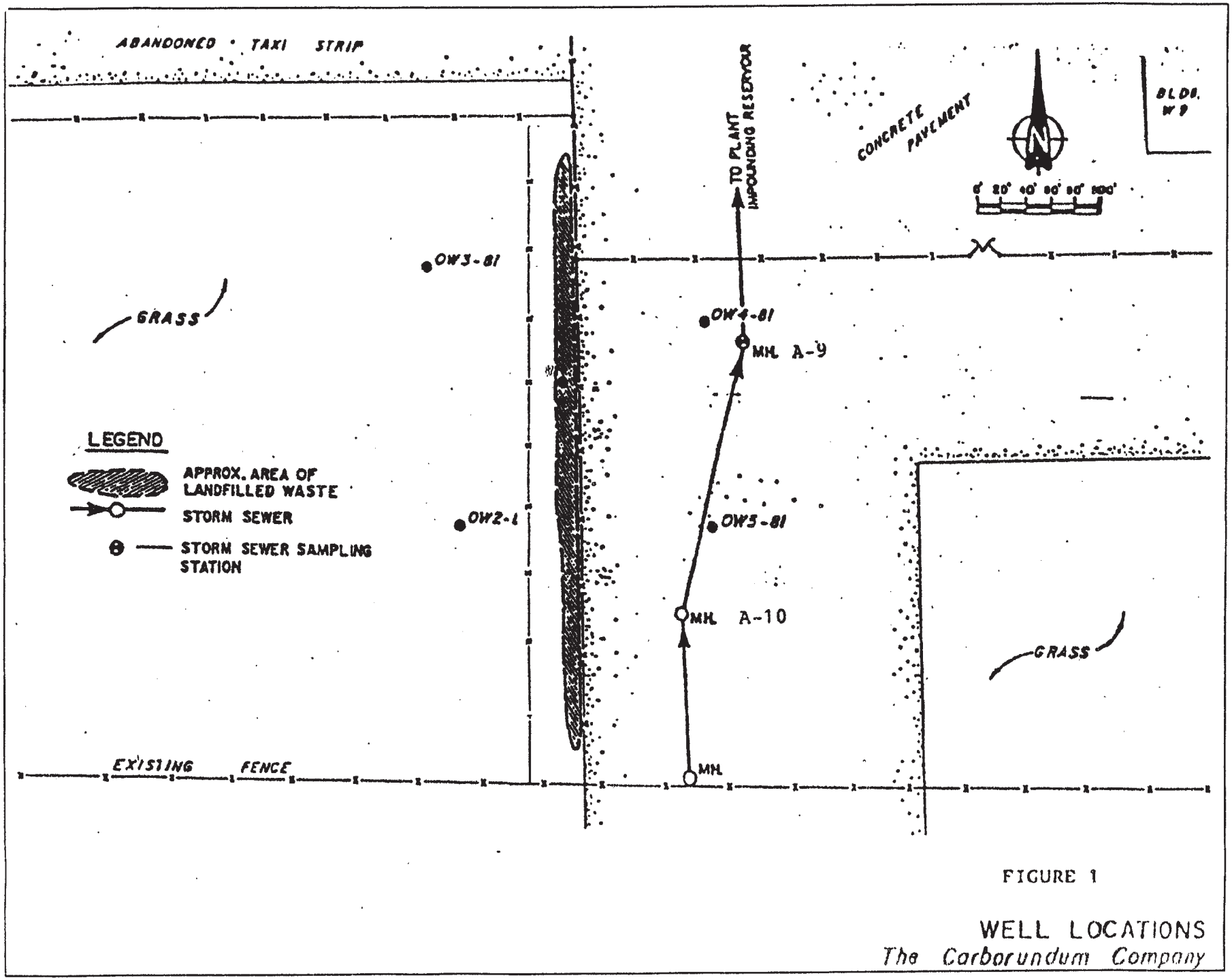
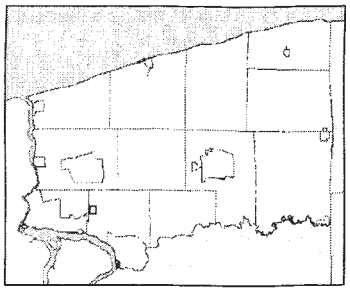


FIGURE 1

WELL LOCATIONS
The Carborundum Company

Figure 1A. SCG Landfill Locations



Legend

Streets and Highways
- Interstate
- Primary State Road
- Secondary State Road
- County Road
- Local Road

Parcels

1Ft Color Aerials
- Red: Band_1
- Green: Band_2
- Blue: Band_3

2Ft Color Aerials
- Red: Band_1
- Green: Band_2
- Blue: Band_3

1: 1,414

Notes

Enter Map Description

0.0 0 0.02 0.0 Miles

NIAGARA COUNTY, NEW YORK
DEPARTMENT OF REAL PROPERTY SERVICES

The most recent biannual sampling and monitoring effort took place in 2013 and included sampling of all four groundwater monitoring wells and one catch basin which drains the surface runoff and subsurface drainage from the landfill area . In accordance with the Site Sampling Plan, the samples collected were all analyzed for pH, specific conductance, temperature, turbidity and phenolic compounds by EPA Method 8270.

GEOLOGY AND HYDROGEOLOGY

The area in the immediate vicinity of the SGA, Inc. (formerly Carborundum Abrasives) plant is underlain by approximately 10-15 feet of clayey to sandy silt, glacial-lacustrine deposits and glacial till. These deposits thicken southward across the site toward the Niagara River. The hydraulic conductivity of these materials is relatively low, perhaps reaching the range of 10^{-5} to 10^{-8} cm/sec.

The bedrock underlying the site consists of approximately 160 feet of dolomite of the Lockport Formation. The upper zone of the Lockport Formation is generally highly weathered, medium gray dolomite with extensive vertical fractures. It is generally striated on the surface, has extensive partings which are argillaceous or gypsum-coated. Water produced from this upper zone in the Bergholtz area of Wheatfield is generally of very poor quality, with a characteristic odor. The water generally is not suitable for drinking but occasionally is used for watering livestock or agricultural purposes. The Town of Wheatfield has extended its water lines throughout the area and recent information indicates that there are few wells in use throughout the area. Those that were used occasionally along Walmore Rd to the south were closed as part of a groundwater remediation effort conducted by the former Bell Aerospace-Textron in the late 1980's and early 1990's. This groundwater withdrawal and treatment on-site continues to the present.

The upper portion of the dolomite sequence consists of 10 to 20 feet of bedrock consisting of thinly bedded dolomite which may produce well yields of 10-20 gpm. Hydraulic conductivities of 0.1 to 0.01 cm/sec may be encountered in this unit. For purposes of this current study, it is not thought that any of the wells penetrate significantly into the bedrock and were either drilled to refusal or into the uppermost few feet of the weathered bedrock. The bedrock surface is generally encountered at elevations between 560 feet to 570 feet MSL and is gently dipping to the south.

The wells monitored in this project were drilled to refusal as indicated in a report by Conestoga-Rovers Associates, who installed the wells in 1981 after placement of a clay cap by Secured Landfill Contractors, Inc. (SLC Contractors). Figure 2 illustrates a typical surficial geologic cross section in the landfill area.

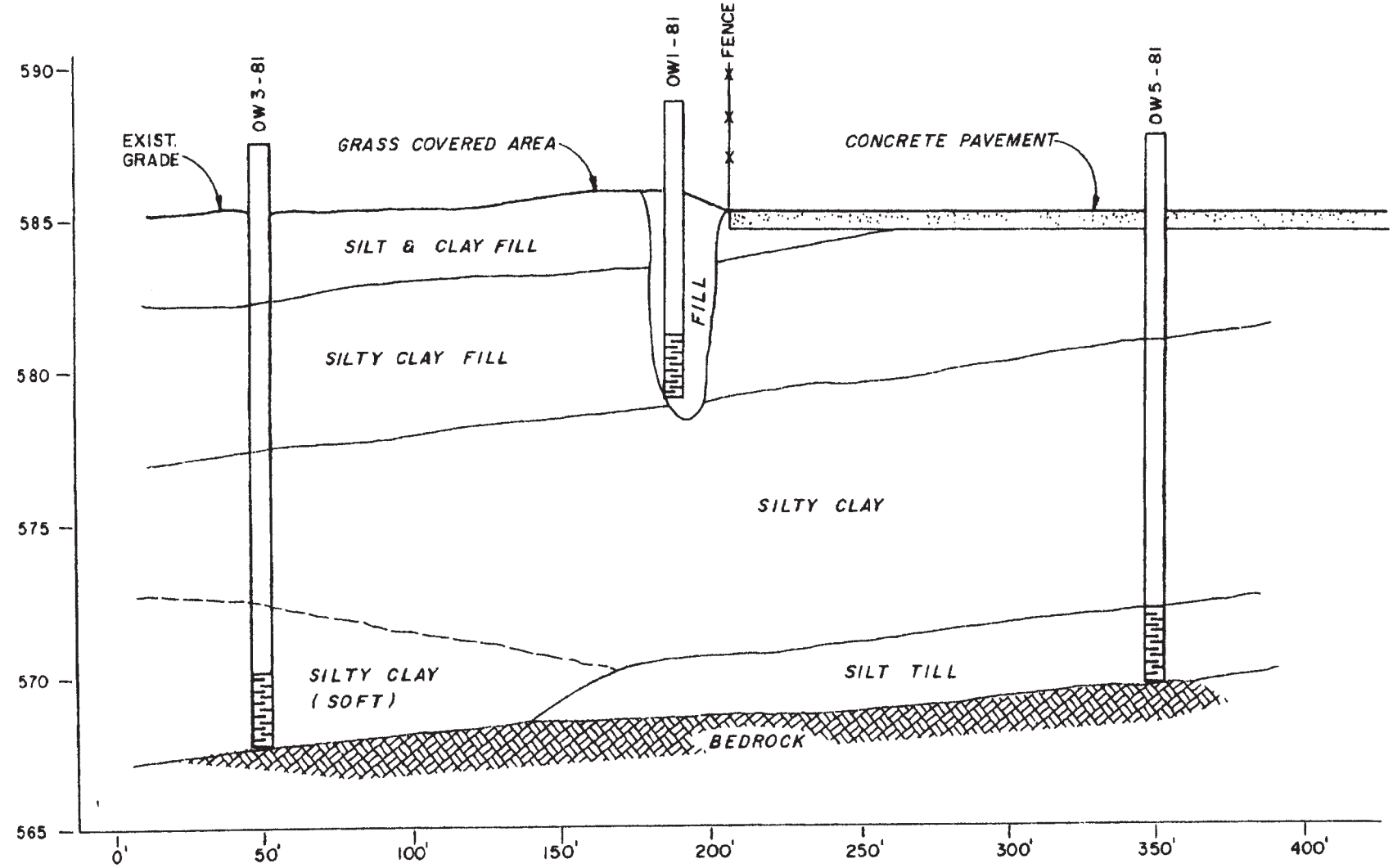


Figure 2

GEOLOGIC CROSS SECTION A - A'

The Carborundum Company

FORMER USE OF THE LANDFILL

The former Carborundum Abrasives Company landfill site in Wheatfield was identified in a report by the Inter-Agency Task Force on Hazardous Wastes in the report entitled "Draft Report on Hazardous Waste Disposal in Erie and Niagara County, New York, March 1979." The site was used during the period 1968 to 1976 to dispose of plant-generated wastes described in the Draft Report as follows:

> **"...partially solidified and solidified resins, floor sweepings, wastes (sic) fillers including calcium carbonate, clays and animal glue (est. 400 tons total) with free phenols (resins) (est. 800 to 1600 lbs total)."**

The method used to dispose of the waste materials involved the excavation of a long, narrow trench. The dimensions of the trench were estimated to be 20 feet in width, 450 feet in length, and 12 feet in depth. As waste materials were deposited into the trench, a soil cover utilizing the excavated soil (glacial-lacustrine clays) was placed over the waste.

MONITORING WELLS

From January 20-22, 1981, Empire Soils Investigations, Inc. installed a total of five groundwater monitoring wells in the landfill area. Four were located at the perimeter of the site and the fifth well was installed through the center of the landfilled waste in order to identify landfill characteristics. This included waste types, depth of disposal, soil cover, and moisture conditions.

All four of the perimeter wells extended to the bedrock-overburden interface or penetrated them slightly. The monitoring well installed in the landfilled waste extended only to the bottom of the landfilled materials. This well was damaged over time and ceased to function properly and was subsequently removed in 1991 (see locations in Figure 1). The wells were constructed of two inch diameter black steel pipe attached to a two foot, Johnson SS well point. All joints were welded during installation. Each well has a protective outer casing with a lockable cap. A typical installation is shown in Figure 3.

STRATIGRAPHY

The landfill area had a typical overburden which included an upper mixed layer of silt and clay fill which supported a grass cover. Two of the wells were installed through the concrete pavement which was approximately six to eight inches in thickness. Beneath these materials was a medium to stiff silty clay material. Traces of vegetative matter could be observed and these materials appeared to be graded and compacted prior to installation of

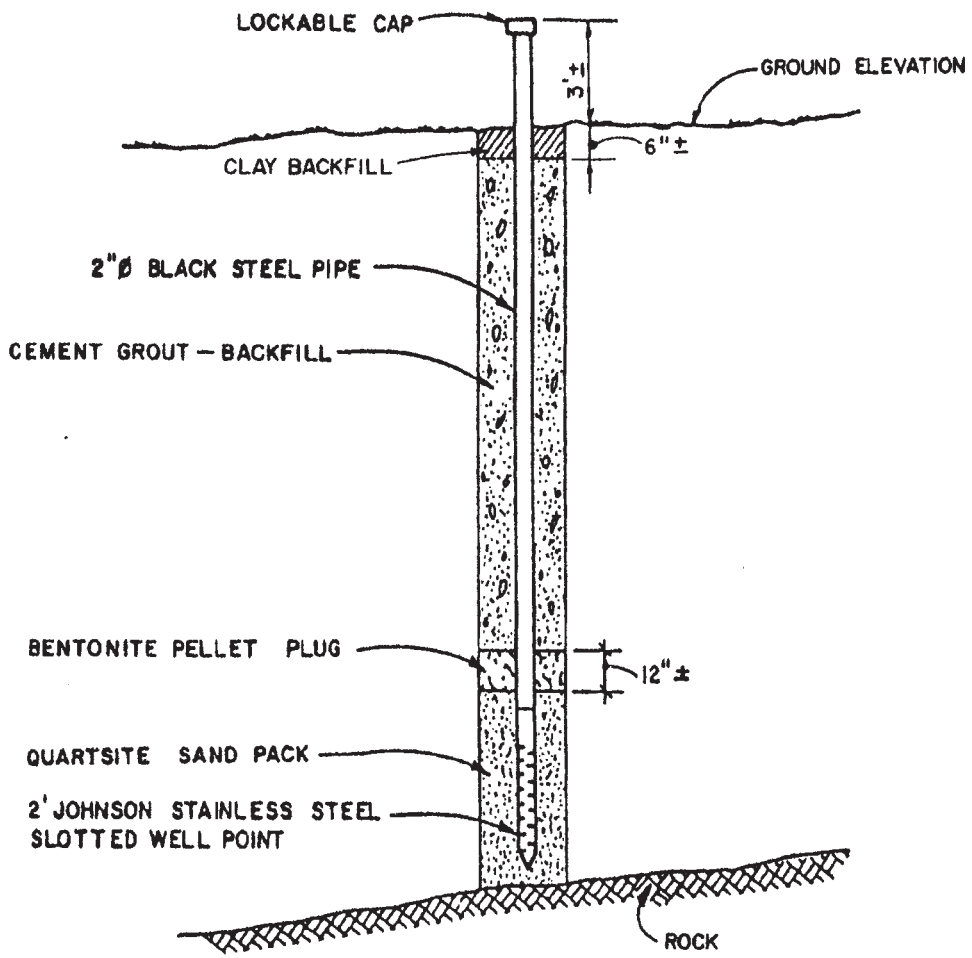


Figure 3

TYPICAL MONITORING
WELL INSTALLATIONS

The Carborundum Company

the concrete pad which, from old photographs of the site, appeared to be either a taxiway or parking area for aircraft manufactured at Bell Aircraft Co. during WW II. Beneath the silty clay fill is a silty clay layer which in the area is reddish brown in color. Some mottling can be observed with gray clay. Beneath these layers is a reddish-brown silt to clayey silt till. The thickness of the materials overlying the bedrock at this site may reach 15 feet based upon other excavations. Most of the perimeter boreholes reached a maximum depth of approximately 17 feet. Bedrock slopes in the area are approximately 0.25 to 0.5 degrees to the south.

Materials encountered in the central borehole included wood, silt, sand, screen materials, paper and the backing cloth used for sandpaper manufacturing. Most of the materials contained in the landfill were general plant trash and off spec materials and damaged goods from the manufacturing process.

GROUNDWATER

The primary presence of groundwater at the landfill site and surrounding area is in a silty till material immediately overlying the bedrock. This layer ranges in thickness from absent at some site locations to approximately 8-12 inches in thickness at others. At the time of the initial investigation in 1981, perched groundwater was observed in the landfill monitoring well. Installation of a landfill cap with appropriate slopes coupled with the low permeability surrounding soils subsequent to the initial investigation in 1981, indicated that the landfill water itself was contained in the landfill. The source was precipitation infiltration. The terrain is relatively flat except for the capped landfill itself. To the west of the landfill, soils remain moist throughout most of the summer due to runoff from the airport runways and taxiways in the area and low permeability of the soils.

The initial piezometric surface observed differs little from 1981 to the present time. The direction of groundwater flow is from the southwest to northeast and has remained constant through the series of investigations carried on over the last 20 years of monitoring by Frontier Technical Associates, Inc. In addition, based up the analysis of the groundwater, the landfill cap has remained intact, and the quality of the groundwater has not been impaired. The landfill is functioning to contain the waste materials present. In addition, it would appear that the waste resins either were polymerized or became polymerized and thus very resistant to breakdown. No phenolic compounds are present in the catch basin draining the immediate area during recent sampling episodes in the last ten years. .

SITE MONITORING AND ANALYICAL PLAN

Sampling Objectives

The results of analysis of samples collected and analyzed in accordance with the approval of the NYSDEC are being used to:

1. Assess the groundwater flow direction and chemistry.

2. Define the nature and extent of pollutant migration, if any.

3. Meet the NYSDEC requirements for data submission.

Sampling Personnel

Sampling personnel must be trained and experienced in the procedures used for data collection, sampling procedures and analytical methodology in the field. They must demonstrate their competence in accordance with NYDOH-ELAP certification program. Personnel must be specifically trained in the analytical procedure and pass demonstrations of capability in accordance with the NYSDOH-ELAP requirements and FTA SOPs implementing the Laboratory Procedures Manual.

The project manager is currently David M. Harty, P.E., BCEE. Mr. Harty has been involved with this site since 1981.

Sampling Locations

As indicated previously, Figure 1A and 1B illustrate the sample locations. Four wells are sampled together with one catch basin (MH-9 located on the "A" Storm Line). Table 1 presents the sample locations and USEPA or Standard Methods analytical methods used for samples from each location. All methods used conformed to the USEPA Methods of

Table 1. Sample Locations and Parameters Analyzed

Well Designation	Well Depth (ft)*	Analytical Parameters**
OW2-81	18.20	pH, Specific conductivity, Temperature, Turbidity, Phenols (8270)
OW3-81	19.66	pH, Specific conductivity, Temperature, Turbidity, Phenols (8270)
OW4-81	19.38	pH, Specific conductivity, Temperature, Turbidity, Phenols (8270)
OW5-81	18.23	pH, Specific conductivity, Temperature, Turbidity, Phenols (8270)
MH A-9	-----	pH, Specific conductivity, Temperature, Turbidity, Phenols (8270)

* Based upon measurement by FTA in 1998; rechecked in 2000 and 2003; measured from top of riser pipe.

** Field measurement of pH made within NYELAP guidelines (15 minutes); Turbidity measured using a nephelometer in the field.

Phenols = Phenol Compounds as measured by EPA Method 8270.

Table 2
Summary of Parameters, Methods,
Preservation Methods and Holding Times

Parameter	EPA Method	Preservation	Holding Time
pH	SM18-21: 4500 H B	None	Analyze Immediately- 15 Minutes (Field)
Specific Conductance	120.1 (rev 1982)	4° C	6 Hours (or Field)
Temperature	SM 18:21 2550B	---	Immediately (Field)
Turbidity	180.1 (Rev 2.0)	4° C	Immediately (Field)
Phenol Compounds	8270	4° C	5 days to extract 28 days to analyze

pH, Specific Conductance, turbidity, and temperature were measured immediately in the field. Frontier Technical Associates, Inc. is a NYELAP-Certified Laboratory (10475).

Analysis for Water and Wastewater (40 CFR Part 136) or SW-846 (as revised). Table 2 is a summary of the parameters, methods used, preservation methods, and holding times required.

Sampling Equipment and Procedures

The procedures outlined here were developed to minimize contamination of water sampling equipment and analyses, minimize concentration changes prior to testing, and standardize procedures to minimize analytical differences.

The procedures below outline the purging, sampling, and preservation methods used during this sampling program in accordance with the approved sampling plan submitted and approved in 1991 and revised in 1999: This plan was revised in November 2012 per the NYS DEC.

1. Annual inspection of the well noting any unusual conditions .

2. The water level indicating device and the bottom foot or more of cable was triple rinsed with distilled water.

3. The depth to the water surface from the top of the riser pipe was measured and recorded on the Sample Collection Form. Depth to the bottom of each well was also measured.

4. The volume of water in each well is calculated. Each well is purged by removing three times this volume, or if the well yield is low, water is removed until the well is considered "dry" (within 1-2 inches of the bottom).

5. A peristaltic pump is used to purge these shallow wells. All tubing coming into contact with the well water consists of food-grade polyethylene tubing dedicated to the well. This dedicated tubing is intended to eliminate cross-contamination between the wells. The tubing was gradually lowered into the well as pumping continued. The volume required, volume obtained, water level before purging, and the start and stop times are to be recorded.

6. All purge water is to be placed in a container specifically used for that well and for measuring purge volume. If the well contained very little volume, this water was reserved for pH, specific conductance and turbidity determination. After a time has elapsed for sufficient recovery, sampling was completed. In one instance several days are occasionally necessary to obtain a sufficient volume for phenol compound analysis. Based upon results of the analyses performed over the past decade, the water, contains no parameters which might be incompatible with the treatment process or SGA's sanitary sewage permit, and is acceptable to the NCSD #1 and meets their criteria. The water is then disposed of in the sanitary sewer.

7. For the wells which generally recover slowly, the wells are sampled within 24 to 48 hours of purging. Sample size, containers and amount of sample obtained are contained in Table 3. In 2007 for example, it took nine days to recharge to an adequate volume for sampling from one well after checking it daily.

8. Groundwater samples are obtained by dedicated tubing. No equipment is to be used for more than one well location.

9. Usually, the first sample is taken for analysis of pH, temperature, specific conductance and turbidity. Probes are triple rinsed with distilled water after use. A standard reporting form with all field data is provided for each well and sample location (See Appendix).

10. Temperature, specific conductance, turbidity and pH were reported on the form along with the equipment used, weather conditions, field observations, and sampling times.

11. Sample container labels are affixed to the sample container and the samples placed in an insulated container where they were kept cool with ice if temperatures were above 4° C.

12. In a similar fashion, samples were obtained for phenolic compounds as required for each sample location (EPA 8270). Each sample label was completed including the date, time, location, analysis required, and sampler's initials.

13. All samples are packed in an insulated cooler with sufficient ice to maintain a temperature of 4° to 6° C during storage and transport to the laboratory.

14. Analyses are to be completed within the specified holding times. The laboratory is notified by the sampling team prior to sampling and upon shipping to assist in scheduling analyses to meet all specified holding times.

SAMPLE CUSTODY

Field sampling data and purging was documented on a Well Monitoring Field Form. The following information was included:

1. Site name (Saint Gobain Abrasives, Inc.), sample number, etc;
2. Date, time, and elapsed time from purge start to finish;
3. Information regarding the well groundwater level, purge volume required, and actual purge volume;
4. Field test results including pH, temperature, turbidity and specific conductance;
5. Sampling method used; the materials of construction of special equipment (in margin);
6. Type of sample and information which appears significant;
7. Field observations/sampling conditions (e.g. weather)
8. Appearance of sample such as color, sediment, oil on surface, obvious odor, etc.
9. Sampler's identity and signature.

In order to maintain integrity of the groundwater samples, strict chain-of-custody procedures are to be followed. From the time the sample was collected until the sample was in the custody of the analytical laboratory, the samples were:

1. In the sampler's possession;

2. In the sampler's view, after being in his/her possession;

3. In the sampler's possession and then locked in a designated, secure area to prevent tampering; or in a sample cooler sealed with a tamper proof chain-of-custody seal.

A written Chain-of-Custody Record of the transfer of samples is maintained with a copy in the Appendix of the Sampling and analytical report.

The Chain-of-Custody Record is transported with the sample container at the time the sample is collected. When transferring the possession of the samples, the person making the transfer signs and records the date and time on the record. The number of custodians in the chain of possession are as few as possible.

SAFETY

Personnel performing the sampling adhered to all safety requirements for contractors and/or visitors of the facility. Personnel performing the sampling wear suitable personal protective equipment.

ANALYTICAL LABORATORIES

The pH, temperature, turbidity and specific conductance are measured in the field by Frontier Technical Associates, Inc., NYELAP # 10475, Katherine A. Wager, Laboratory Director. FTA is a certified NYSDOH-ELAP laboratory. All field analyses for appropriate parameters under the NYELAP program are performed within prescribed holding times (15 minutes for pH for example, in the field.) The phenol compound analyses (EPA 8270) is performed by ALS Environmental, NYELAP # 10145. Each laboratory is certified for the parameters for which data are provided.

FIELD SAMPLING PERSONNEL

All field sampling and field measurements were performed by personnel who are specifically trained in the analytical procedure and who pass demonstrations of capability in accordance with the NYSDOH-ELAP requirements and FTA SOPs implementing the Laboratory Procedures Manual.

RESULTS OF RECENT SAMPLING AND INSPECTIONS

Phenol Compounds

Table 3 is a summary of the analysis for phenol compounds for 2013 (Complete data are contained in Appendix II). EPA Method 8270 was used for analysis of these compounds. There were no detectable concentrations of phenol above minimum detection or quantitation limits in all samples analyzed including the duplicate sample obtained at Well OW4-81. Surrogate recovery data indicated acceptable recoveries of spiked compounds. The data are consistent with the data collected over the last 20 years, and there is no reason to believe with the low detection limits reported here, that phenol compounds are migrating from the landfill. Tables 4 and 5 summarize the 2012 field data collected and analyzed.

Table 3
Results for Phenol Compound (EPA Method 8270) Analysis
at Saint Gobain Abrasives Inc.
(August 16, 2013)

Location	Concentration (mg/l) All Phenol Compounds*
OW2-81	ND
OW3-81	ND
OW4-81	ND
OW4-1(Dup)	ND
OW5-81	ND
MH A-9	ND
Method Blank	ND

ND = None of the 14 phenolic compounds detected by this method were present above laboratory quantitation levels for each sample (See Analytical Report).

MS/MSD Recovery: Insufficient sample volume

Table 4
Groundwater Elevations at
Saint Gobain Abrasives, Inc.
(August 16, 2013)

Date	Well No.	Top of Pipe Elevation	Depth to Water Surface	Groundwater Elevation
08/16/13	OW2-81	588.50	7.43	581.07
08/16/13	OW3-81	587.59	7.28	580.31
08/16/13	OW4-81	587.74	10.00	577.74
08/16/13	OW5-81	587.52	10.43	577.09

* Groundwater level measurements obtained on August 16, 2013 by Ronald B. Blinston of Frontier Technical Associates, Inc. under the supervision of David M. Harty, PE, BCEE.

The groundwater elevation data presented above were obtained under my supervision and represent, to the best of my knowledge, accurate measurements for the date listed.

David M. Harty
PE, BCEE

Table 5
Field Monitoring Data
at Saint Gobain Abrasives Inc.
(August 16, 2013)

Well No.	pH (SU)	Specific Conductance (umhos/cm)	Turbidity (NTU)
OW2-81	7.11 (7.07)	3760	31.9
OW3-81	7.00	3150	250
OW4-81	10.88	1946	>999
OW5-81	6.01	6270	>999
MH A-9	6.87	664	2.79

Notes:

pH, specific conductance and turbidity analyses performed by Kathy Wager immediately upon sampling. Duplicate analysis is in "( )".

The recoveries of spiked surrogate compounds in the set of samples analyzed from the site were very similar. Duplicate analysis performed on OW4 indicated consistent results with the separate sample. Laboratory Control Sample (LCS) recoveries were also within QC limits and indicated agreement with surrogate recoveries. The monitoring wells appear to have a dark, biological particulate material. These waters when stored in the laboratory support rapid biological growth. The method blank also had no detectable phenol at MDLs or MRLs.

It should be noted that historically only "phenol" resins were used in the resins and materials disposed in the landfill. The other compounds, particularly chlorinated phenols, were not used and have never been detected.

Quality Assurance/Quality Control

As part of the QA/QC activities associated with the 2013 sampling episode, a field duplicate was obtained at Well OW4-81, surrogate recoveries were reported, and a method blank was analyzed for this batch. A matrix spike and matrix spike duplicate was also not performed due to insufficient sample volume. Analysis for all these samples was by EPA Method 8270.

Physical Appearance

New concrete pads installed in 1999 at Wells OW2-81 and OW3-81 by Frontier Technical Associates, Inc. has remained intact. The riser for Well OW4-81 was replaced and repaired in 2004 due to a vehicle collision. Some cracking may be present in the well pads but this does not impede their function. Quarterly inspections of the landfill area continue under the supervision of Saint Gobain Abrasives Co. Annual well inspections are conducted by Frontier Technical Associates, Inc. Copies of the annual inspection report has been provided to Mr. Michael Hinton, P.E. and Mr. Brian Sadowski of the NYSDEC Region 9.

COMMENTS ON HISTORICAL DATA

Groundwater associated with the Lockport Dolomite is highly mineralized as evidenced by the specific conductance values measured at the wells which indicates the concentration of dissolved solids present. This has been consistent with previous data from this site and data available for wells in the immediate vicinity.

As a result of evaluation of the data recovered, the following is concluded:

1. Sampling of the four existing monitoring wells and catch basin in 2013 and quantification of the phenolic compounds again showed no detectable levels of any of the phenol compounds above detectable or quantitation limits.

2. Groundwater data indicate no migration of materials from the former landfill. This confirms after 28 years of monitoring that the containment and cap is effective.

3. Any future monitoring for phenols should continue to use EPA Method 8270.

4. There are no data developed within the past several years that would indicate any need to alter the current monitoring frequency (every two years).

5. pH measurements during this episode indicate elevated pH values at Well OW4-81. Repair and replacement of the riser for this well was completed during the Fall of 2004. It is believed that the bentonite-cement grout and water migrating along the casing contributed to the rise in pH at this location.

6. Well OW5-81 has the highest value of specific conductance and the presence of black particles has always been noted. There was no change otherwise.

OPERATIONS AND MAINTENANCE PLAN

This operation and maintenance plan was modified from the original plan developed in 1999 and taken from the following document with appropriate timely minor modifications:

> **"Operations and Maintenance Plan, Landfill Area St. Gobain Abrasives Company, Frontier Technical Associates, Inc. Report ET-99-703-02."**

Originally five wells were installed in the landfill area, one in the landfill itself and four on the perimeter of the landfill. In 1991, one well was removed because it was no longer functioning properly and soil shifts between the cap materials and landfill materials themselves had occurred, most likely due to settling. The request was approved and implemented on September 27, 1991. The phenolics analytical methodology was changed from the 4AAP method to EPA Method 8270 to develop more specific and accurate data.

Site Inspection

The physical attributes of the site will be inspected annually This inspection may be conducted by Saint Gobain Abrasives personnel or Frontier Technical Associates, Inc. personnel. The inspections will be conducted in July.

For each monitoring point, the following items will be included: well locks, well casings, covers, concrete pads, bailers and ropes (if any), general conditions and tubing. If any of these items are missing, deteriorated or in disrepair, they will be replaced as or repaired as appropriate. This action will be undertaken immediately or prior to the next quarterly inspection as appropriate. A written inspection report (usually a form) will be prepared and completed and maintained on file at Saint Gobain Abrasives, Inc.

A monitoring point assessment form to be used for the annual inspection is attached in the Appendix. A copy of the completed forms will be forwarded to the NYSDEC Project Manager.

Physical Conditions and Grass Cutting

During the annual inspection, observations of the landfill cap will be made to assess whether any soil slumping is present, rodent burrows present, growth of any large rooted vegetation, etc. Brush and bushes will be trimmed and the area will be kept free of debris or trash which might blow onto the site.

Grass cutting will be performed as needed, however it is expected that it will be cut at least once annually after August 15th as a habitat objective.

Annual Inspection

Once each year, the wells will be purged and depths checked. If depth data indicates infilling of sand or sediment to a depth of 25% of the screen length, the wells will be developed in order to remove the sediment. Sampling and purging will be conducted in accordance with the following schedule:

1999	Purging, Sampling	2007	Purging, Sampling
2000	Purging	2008	Purging
2001	Purging, Sampling	2009	Purging, Sampling
2002	Purging	2010	Purging
2003	Purging, Sampling	2011	Purging, Sampling
2004	Purging	2012	Purging
2005	Purging, Sampling	2013	Purging, Sampling
2006	Purging	2014	Purging

During even years, field measurements are taken after completion of purging during the annual inspection. However, biannual sampling for phenols occurs only in odd years.

The annual inspection (even years) will include the following in addition to purging:

1. Analysis of well samples for field parameters; pH, turbidity, specific conductance and temperature.

2. The depth/elevation to the water surface. The total depth of each well will be checked against previous measurements. If infilling is noted, well development will be scheduled.

3. Each well will be purged to remove suspended sediment and biological growth, if present.

4. A peristaltic pump or bailer may be used to purge these shallow wells. All tubing or bailers are dedicated to ensure that no cross-contamination occurs.

5. In years ending with odd numbers, sampling will be conducted in accordance with the sampling and analytical plan and schedule above.

Safety

Personnel performing the sampling will adhere to all safety requirements for contractors and visitors to the SGC facility. In addition, since two of the wells are within the security fence erected by the NFTA and the USAF, appropriate arrangements with the NFTA Police and an escort is required to inspect and conduct operations at those well locations. Personnel performing the sampling or purging will wear suitable field boots, and protective gloves and safety glasses or goggles.

EVALUATION OF REMEDY PERFORMANCE, EFFECTIVENESS, AND PROTECTIVENESS

As can be seen from the information presented above and elsewhere in this document, the landfill cap is functioning as intended, the lacustrine clay surrounding the fill has prevented any escape of phenols and phenol-containing resins, and the polymerization of these materials, appears to have taken place. There has been no detection of phenol containing materials or alteration of the groundwater quality though out the last twelve year monitoring period (1999-2013). Therefore, no change in the current status of the landfill or the monitoring plan is appropriate.

IC/EC PLAN COMPLIANCE REPORT

The clay cap, periodic inspections and biannual sampling of the monitoring wells and catch basin have been proven effective in prevention of seepage of leachate from the landfill. In addition the site appears to be relatively dry from a groundwater standpoint. Recharge of three of the wells is generally slow. The site monitoring plan is appropriate for the type of site and little maintenance appears to be warranted provided inspections are conducted on a regularly scheduled basis.

The plans were updated in November 2012 per the NYS DEC.

OVERALL PRR CONCLUSIONS AND RECOMMENDATIONS

1. Site analytical plan is adequate for the site and the monitoring frequency is appropriate. No detection of phenol-containing groundwater has occurred in the last ten years.

2. Biannual sampling, annual well development and field sample analysis, including annual inspection provides an adequate level of protection for the facility and remedy.

3. The O & M plan, in conjunction with the annual inspection, has been adequate to detect any changes in the landfill cap or site conditions. Inspections have been reduced to annually beginning in 2013.

4. The changes in this facility have been minimal during the past thirty years, there is no reason to believe that this may change. At some point in the future, monitoring wells may have to be replaced, but at this point they are functioning properly and in good repair. Annual inspections will be sufficient to detect any needed repair needed.

APPENDIX

2013 Annual Reports

Sampling and Analytical Plan

Operations and Maintenance Plan

2013 Analytical Data Laboratory Report

FRONTIER TECHNICAL ASSOCIATES INC.

GROUNDWATER SAMPLING & ANALYSIS PLAN

LANDFILL AREA

St. Gobain Abrasives, Inc.

NYSDEC Site 932007

FTA Report ET-703-GWP2

November 19, 2012

Prepared For:

Mr. Douglas Wright
St. Gobain Abrasives, Inc.
6600 Walmore Road
P.O. Box 301
Niagara Falls, NY 14304

Prepared By:

Frontier Technical Associates, Inc.
8675 Main Street
Williamsville, NY 14221

The sample and analysis plan provided herein was developed for St. Gobain Abrasives Company management use only and, except for required regulatory compliance submission, is not intended for any other purpose.

Table of Contents

Introduction

In response to the requirements of NYSDEC Region 9, St. Gobain Abrasives Inc. has been requested to supply this revised groundwater sampling and analysis plan for the landfill area located on the southwest corner of the property in Wheatfield, New York. Figure 1 is a sketch of the landfill area showing the location of the monitoring wells which were installed in 1981 and the location of the "A" storm sewer line (West Branch), Frontier Technical Associates, Inc. has prepared this plan for St. Gobain's submission to the NYSDEC. This revised plan is amended from the plan submitted and approved in 1999.

Previously, technical reports were prepared which described the results of the priority pollutant sampling and analysis in 1990 and 1991. This included sample splits and full QA/QC. As a result of the findings, the NYSDEC subsequently reduced monitoring parameters for 1992. For 1993, the NYDEC deleted the requirement for analysis of filtered and unfiltered groundwater samples for metals including zinc. In 1994, all metals requirements were deleted and turbidity was added for informational purposes. This report presents the current requirements for monitoring at the landfill and discusses maintenance activities which have been performed in connection with the wells since 1994. In addition, a new section on Operations and Maintenance of the monitoring wells has been added.

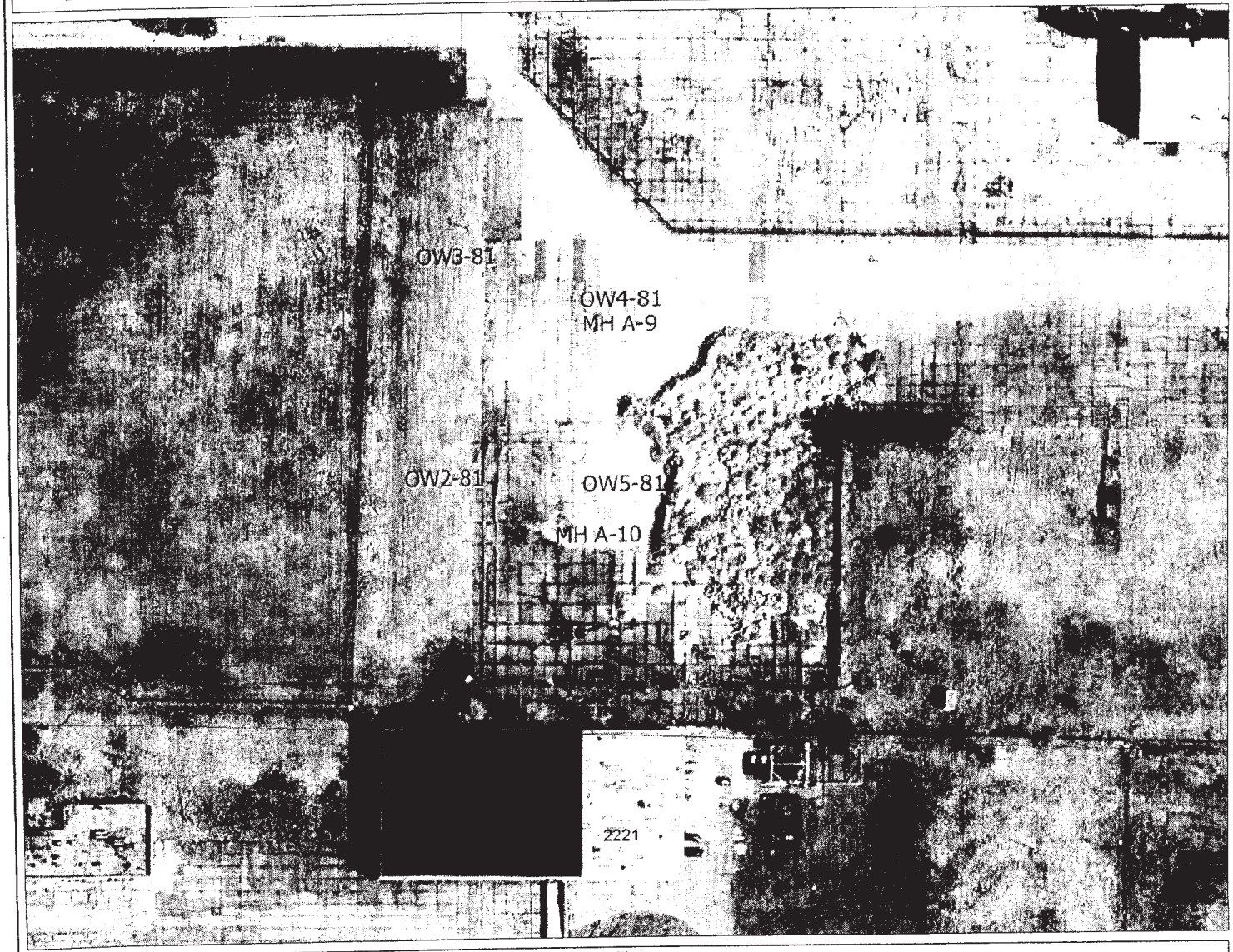
Chronology

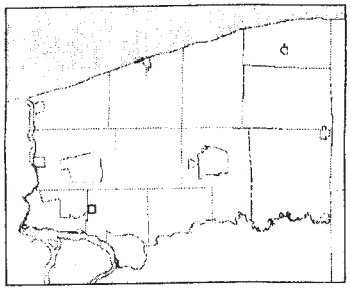
Since 1982, the monitoring wells and adjacent catch basins were sampled for pH and total phenolics (4AAP). In the period 1982-1988 there were no detectable levels of phenolics (4AAP) in monitoring wells OW2-81 through OW5-81. However, in 1989, perhaps as the result of unusual spring and summer precipitation events, low levels of phenolics were detected in the monitoring wells and adjacent catch basins. Again in 1990, low levels of total phenolics were detected. This resulted in the NYSDEC's desire to obtain additional data for evaluation beginning in 1991 as discussed above. Based upon the 1991 results, Carborundum Abrasives requested the decommissioning of one well (OW1-81) which had fallen into disrepair and was no longer functioning. The request was approved and subsequently implemented on September 27, 1991. The phenolics analytical methodology was also changed to the more accurate and specific SW846 Method 8270 and approved by the NYSDEC.

On May 20, 1994, new locking caps were installed on Well OW2-81 and OW4-81 by Frontier Technical Associates, Inc. New concrete pads were also installed by FTA around Well OW2-81 and OW3-81 on June 26, 1997.

As the result of review of the well depths presented in the 1997 sampling report, Frontier Technical Associates, Inc. undertook the redevelopment of all four wells in the monitoring network. On October 16 and 22, 1998, each well was purged and flushed two times on each day. A well development report dated January 28, 1999 was prepared and forwarded to the NYSDEC (Mr. Michael Hinton) for review. As a result of the review, this revised and updated Sampling and Analysis Plan (SAP) has been prepared. This report outlines the approach used to fulfill the NYSDEC requirements f or updating and revising the SAP to reflect current practice and requested and approved changes to the previous plans.

Figure 1 SCG Landfill Locations





Legend

Streets and Highways
- Interstate
- Primary State Road
- Secondary State Road
- County Road
- Local Road

Parcels

1Ft Color Aerials
- Red: Band_1
- Green: Band_2
- Blue: Band_3

2Ft Color Aerials
- Red: Band_1
- Green: Band_2
- Blue: Band_3

1: 1,414

Notes

Enter Map Description

0.0 0 0.02 0.0 Miles

NIAGARA COUNTY, NEW YORK
DEPARTMENT OF REAL PROPERTY SERVICES

Geology and Hydrogeology

The area in the immediate vicinity of the St. Gobain plant is underlain by approximately 10 to 15 feet of clayey to sandy silt, glacial-lacustrine deposits and till. These deposits thicken southward across the site toward the Niagara River. The hydraulic conductivity of these materials is relatively low perhaps reaching the range of $1x10^{-5}$ to $1x10^{-8}$ cm/sec.

The bedrock underlying the site consists of approximately 160 feet of dolomite of the Lockport Formation. The upper zone of the Lockport Formation is generally highly weathered, medium-gray dolomite with extensive vertical fractures. The dolomite has partings which are argillaceous or gypsum-coated. Water produced from this upper zone in the Bergholtz area of Wheatfield is generally of very poor quality, with a characteristic odor. The water generally is not suitable for drinking but is used for watering livestock or agricultural purposes. The Town of Wheatfield has extended its water lines throughout the area and recent information indicates that there are few wells in use throughout the area. On the adjacent property formerly operated by Textron Defense Systems, groundwater remediation is being conducted. The bottom of the St. Gobain landfill is up dip in the Lockport Dolomite. This appears to have had little effect on the St. Gobain landfill site as evidenced by historical groundwater elevation data.

The upper portion of the dolomite sequence consists of 10 to 20 feet of bedrock consisting of thinly bedded dolomite which may produce well yields of 10 to 20 gpm. Hydraulic conductivities of 0.1 to 0.01 cm/sec may be encountered in this unit. For purposes of this current plan, it is not thought that any of the wells penetrate significantly into the bedrock and were either drilled to refusal or into the uppermost few feet of the weathered bedrock. The bedrock surface is generally encountered at elevations between 560 feet to 570 feet MSL and gently dips to the south. The wells monitored in this project were drilled to refusal as indicated in a report by Conestoga-Rovers Associates, who installed the wells in 1981 after placement of a clay cap by Secured Landfill Contractors, Inc.

Sampling and Analytical Methods

Sampling Objectives

The results of samples collected and analyzed in accordance with the approval of the NYDEC are to be used to:

1. Assess the groundwater flow direction and chemistry.
2. Define the nature and extent of pollutant migration, if any.
3. Meet the NYDEC requirements for data submission.

Sampling Locations

Figure 1 illustrates the sample locations. Four wells are to be sampled together with one catch basin (A-9). Table 1 presents the sample locations and the analytical parameters for each location. All methods used conformed to the Standard Methods for Examination of Water/Wastewater, EPA Methods of Analysis for Water and Wastewater (40 CFR 136) or SW-846. Table 2 is a summary of the parameters, methods used, preservation methods, and holding times required for this site.

Sample Designation

All samples obtained at the St. Gobain site shall have sample numbers which are unique to the well or sampling location. For example, the numbering scheme below will be used:

OW-2
OW-3
OW-4
OW-5
MH A-9

Any trip blanks, field blanks, equipment blanks, matrix spikes, and matrix spike duplicates shall have identifying sample numbers which are unique. Any and all split samples made available for NYSDEC duplicate analysis will be marked and labeled as above.

Table 1 Sample Locations and Well Depths

Well Designation	Well Depth (feet)*
OW2-81	18.20
OW3-81	19.66
OW4-81	19.38
OW5-81	18.23
MH A-9	---

* Based upon measurement by FTA in 1998 after well development; measured from top of riser pipe.

** Field measurement of pH made within NYELAP guidelines (15 min). Turbidity measured using a nephelometer in the field.

All samples are analyzed biannually for pH, specific conductivity, temperature, turbidity and phenol by Method 8270

Table 2
Summary of Parameters, Methods, Preservation Methods and Holding Times

Analysis	Method	Preservation Method/ Sample Container	Holding Time*
pH	SM4500 HB	None/plastic or glass	Analyze immediately in the field
Specific Conductivity	EPA 120.1	None/plastic or glass	Analyze immediately in the field
Temperature	SM2550B	None/plastic or glass	Analyze immediately in the field
Turbidity	EPA 180.1	None/plastic or glass	Analyze immediately in the field
Phenol	SW846 8270	4°C; glass	7 days to extraction; 40 days for analysis

* pH, specific conductivity, temperature, turbidity measured in the field. Frontier Technical Associates is a NYELAP-Certified Laboratory (10475).

Sampling Equipment and Procedures

The procedures outlined here were developed to minimize contamination of water sampling, minimize concentration change prior to testing, and standardize procedures to minimize analytical differences.

The following procedures outline the purging, sampling, and preservation methods used during this sampling program in accordance with the approved sampling plan submitted in 1991 and used to the present time:

1. Inspection of the well noting any unusual conditions.

2. The electronic water level meter probe will be triple rinsed with distilled water.

3. The depth to the water surface from the top of the riser pipe will be measured and recorded on the Well Monitoring Field Form. The total depth of each well is to be checked against previous measurements made by the sample team since the 1998 well redevelopment.

4. Calculate the volume of water in each well. Purge each well by removing three times the volume, or if the well yield is low, remove water until the well is "dry." (within 1-2 inches of bottom).

5. A low-flow peristaltic pump will be used to purge these shallow wells. All tubing coming into contact with the well water shall consist of food-grade polyethylene tubing dedicated to the well or catch basin. This dedicated tubing is stored in its respective well. The dedicated tubing is necessary to prevent cross-contamination between the wells. The tubing will be gradually lowered to the bottom of the well. The volume required, the volume purged, water level before purging, and the start and stop times will also be recorded on the Well Monitoring Field Form.

6. All purge water will be placed in a container specifically used for that purpose and for measuring purge volume. Based upon the results of the analyses previously conducted, the water contains no pollutants incompatible with the treatment process or St. Gobain's sanitary sewage permit, and has been acceptable to the NCSD and meets their criteria. The water will be disposed of in the sanitary sewer.

7. Because most of the wells recover slowly, the wells will be sampled within 24 hours of purging. Sample size, containers, and amount of sample obtained are listed in Table 3. If any delays are encountered, proper documentation must be provided.

8. Groundwater samples will be obtained by dedicated tubing. No equipment will be used for more than one well.

9. Usually, the first sample is taken for analysis of pH, specific conductance, temperature and turbidity. All field analysis equipment is triple rinsed with distilled water prior to and after use.

10. Temperature, specific conductance, turbidity and pH are reported on the Well Monitoring Field Form along with equipment used, weather conditions, field observations, and sampling times.

11. Sample container labels will be affixed to the sample container and the samples placed in an insulated container where they will be kept cool with ice.

12. In a similar fashion, samples will be obtained for phenolic compounds as required for each sample location. Each sample label will be completed including the date, time, location, analysis required, and sampler's initials.

13. All samples are to be packed in an insulated cooler with sufficient ice to ensure a temperature of $4^{\circ}C$ during storage and transport to the laboratory.

14. If analyzed locally, all samples will be transported to the laboratory on the same day acquired. If a laboratory outside of the immediate area is chosen, the samples will be shipped by overnight service.

15. Analyses will be completed within the specified holding times (see above). The laboratory will be notified by the sampling team prior to sampling and upon shipping to assist in scheduling analyses to meet all specified holding times.

Table 3 Sample Containers and Required Sample Volume

Analysis	Container	Sample Volume
pH, Specific Conductance, Temperature	Plastic or glass	500 ml
Turbidity*	Glass vial	25 ml
Phenol	Glass	1000 ml

Well Monitoring Field Form will be used to record the following data/information:

1. Site name (St. Gobain), sample number, etc.
2. Date, time, and elapsed time from sample start to sample finish (if applicable);
3. Information regarding purging the well prior to sampling including initial groundwater level, purge volume required, and actual purge volume;
4. Field test results including pH, temperature, turbidity and specific conductance;
5. Sampling method used; the construction material of equipment;
6. Type of sample and information which appeared significant;
7. Field observations/sampling conditions (e.g., weather);
8. Appearance of sample, such as color, sediment, oil on surface, obvious odor, etc.;
9. Sampler's identity and signature.

Sample Custody

In order to maintain integrity of the groundwater samples, strict chain-of-custody procedures will be followed. From the time the sample is collected until the sample is in the custody of the analytical laboratory, the samples are required to be:

1. In the sampler's possession;
2. In the sampler's view, after being in his possession;
3. In the sampler's possession and then locked in a designated, secure area to prevent tampering; or
4. In a sample cooler sealed with a tamper-proof chain-of--custody seal.

A written Chain-of-Custody Record of the transfer of samples must be maintained. An example can be found in the Appendix of this report.

When transferring the possession of samples, the person making the transfer signs and records the date and time on the record. The number of custodians in the chain of possession should be as few as possible.

Landfill Operations and Maintenance

A landfill area operations and maintenance plan has been developed to address the requirements to inspect and maintain the landfill area proper as well as the monitoring wells. In connection with this plan, an inspection schedule, grass cutting requirements, and required items to be performed have been outlined in detail. A copy of the site O & M Plan is included as an Appendix to this SAP.

Safety

Personnel performing the sampling must adhere to all safety requirements for contractors and/or visitors to the St. Gobain facility. Personnel performing the sampling must wear suitable field boots and protective gloves and goggles or safety glasses. Since no detectable levels of priority or hazardous pollutants have been present in the past, additional safety clothing may be used but is not required.

Analytical Laboratories

The pH, temperature, turbidity and specific conductance are to be measured in the field by Frontier Technical Associates, NYELAP #10475. All other analyses must be performed by a NYELAP-certified laboratory. Each laboratory must be certified for the parameters for which data are provided. No other laboratory may perform any analyses related to the effort reported here without demonstrating that they have and maintain the required NYELAP certification for the required parameters.

Field Sampling Personnel

All field sampling and field measurements must be performed by qualified personnel. Personnel performing the work must be identified in the sampling report, and if requested, must present their certifications, licenses and/or professional qualifications for inspection by the St. Gobain Environmental Engineer.

Samples must be in the custody of the above personnel at all times or be sealed in a container with a tamper-proof seal attached. A summary of weather conditions during the sampling period must be recorded on field sampling forms.

Reporting

Daily field sampling reporting forms including all sample collection forms, inspection reports, purging data, weather conditions and chain-of-custody forms shall be maintained. Within approximately 15 business days of receipt of laboratory data, three copies of the sampling and analytical report shall be delivered to the St. Gobain Environmental Engineer. In turn, after review and approval, St. Gobain will transmit one copy to the NYSDEC Project Monitor (Mr.

Brian Sadowski and Mr. Michael Hinton). In the event of discovery of a significant concentration of phenol in the wells, a determination will be made as to the cause or source and a decision to resample only those wells, if necessary, will be made to reconfirm the analysis. This will be done in consultation with the St. Gobain and NYSDEC, as appropriate.

As a minimum, the following data shall be provided in any sampling report provided in accordance with this SAP:

1. Groundwater Elevations; these data shall be certified by a Professional Engineer.
2. Piezometric Surface Map of groundwater elevations and inferred groundwater flow direction.
3. A summary of pH, Turbidity, and Specific Conductance sampling and analytical results.
4. pH, Turbidity, Specific Conductance and Phenol concentration of water sampled from MH A-9 if there is any flow present (A-9 is frequently dry unless rainfall or snowmelt is occurring).
5. A summary of the phenol analytical results (8270) including all QA/QC data.
6. A discussion of the findings including any quality assurance/quality control data.
7. Results of the field duplicate and surrogate recovery, method blank and matrix spike and matrix spike duplicate, if analyzed, must be presented.
8. Conclusions and Recommendations for future action including any O & M required.
9. Appendix to include field data and notes, groundwater elevations, observations, well inspection reports, laboratory report(s), and chain-of-custody forms.

APPENDIX

I. Well Monitoring Field Form

II. Sample Well Inspection Report Form

III. Operations and Maintenance Plan

IV. Chain-of-Custody Form

FRONTIER TECHNICAL ASSOCIATES, INC.
WELL MONITORING FIELD FORM

Site Location: Saint-Gobain Abrasives Landfill Job No: ET- 703
Sample Point ID: _____ Consultant: **Frontier Technical Associates, Inc.**
PURGE INFORMATION Purge Method: Bailer, Peristaltic Pump
Depth to Bottom of Well: _____ft. 2" Well = 0.17 gals/ft.
Depth to Water Surface: _____ft.
Depth of Water Column: _____ft.
Volume of Standing Water in Well: _____ gallons
Start of Purge: Date: __/__/____ Time: ___:_____
End of Purge: Date: __/__/____ Time: ___:_____
Total Volume Purge: _____ gallons Well Purged Dry?: Yes No
# of Volumes Purged _____Purging Personnel:_____
Recharge Rate: Rapid, Slow, Extremely Slow
SAMPLING INFORMATION Sample Method: Bailer, Peristaltic Pump, Bladder Pump
Sample Date: __/__/____ Sample Time: ___:___ Depth to Water Surface _____ ft.
Sample Appearance: _____
Samples Preserved: Yes No
Sampling Personnel: _____
FIELD MEASUREMENTS
Meters Calibrated Yes No

PARAMETER	METER NUMBER	UNITS	MEASUREMENT	NOTES
pH	Hanna HI9023	STD. UNITS		
Spec. Conductance	Oakton Con6	µMHOS/CM		
Temperature	Oakton Con6	C		
Turbidity	Hach 2100P	NTU		

Weather: _____
Notes: _____

FRONTIER TECHNICAL ASSOCIATES INC.
8675 Main Street Williamsville, NY 14221 (716)634-2293 NYSDOH ELAP No. 10475

Monitoring Point Assessment Form at Saint-Gobain Abrasives Landfill

Monitoring Point:_____ **Date:**_____

Inspector's Name (Print):_____

Well Locked:	**Yes**	**No**	**NA**
Lock Functioning:	**Yes**	**No**	**NA**
Bailer and Rope OK:	**Yes**	**No**	**NA**
Tubing OK:	**Yes**	**No**	**NA**
Protective Casing OK:	**Yes**	**No**	**NA**
Concrete Pad in Good Condition:	**Yes**	**No**	**NA**
Heaving of Well or Casing:	**Yes**	**No**	**NA**
Well Sand in Purge Water:	**Yes**	**No**	**NA**
Well Constricted:	**Yes**	**No**	**NA**
Debris in Well:	**Yes**	**No**	**NA**
Insects in Well:	**Yes**	**No**	**NA**

Other Observations or Details on Conditions Above: _____

_____

_____

Inspector's Signature:_____

FRONTIER TECHNICAL ASSOCIATES INC.

OPERATIONS AND MAINTENANCE PLAN

LANDFILL AREA

ST. GOBAIN ABRASIVES INC.

(Addendum to Sampling and Analytical Plan)

Report ET-703-02

November 19, 2012

Prepared for:

Mr. Douglas Wright
St. Gobain Abrasives Inc.
6600 Walmore Road
P.O. Box 301
Niagara Falls, NY 14304

Prepared by:

Frontier Technical Associates, Inc.
8675 Main Street
Williamsville, NY 14221

INTRODUCTION

In response to the requirements of NYSDEC Region 9, St. Gobain Abrasives Inc. has been monitoring groundwater and performing sampling and analysis for the landfill area located on the southwest corner of the property in Wheatfield, New York since 1981. Figure 1 is a map of the landfill area showing the location of the monitoring wells which were installed in 1981 and the location of the "A" storm sewer line (West Branch). Frontier Technical Associates, Inc. has been performing monitoring and inspection on behalf of St. Gobain Abrasives Inc. and has prepared this supplemental report for St. Gobain's submission to the NYSDEC. Previously, technical reports were prepared which described the results of the sampling and analysis for each year and a formal monitoring or sampling and analytical plan has been on file since 1991. The NYSDEC subsequently reduced monitoring parameters for 1992. For 1993, the NYSDEC deleted the requirement for analysis of unfiltered groundwater samples for metals, and for 1994, all metals requirements were deleted and turbidity was added for informational purposes. In 1998, the NYSDEC approved a modification of the monitoring frequency to once every two years.

Originally, five wells were installed in the landfill area--one in the landfill itself and four on the perimeter of the landfill. In 1991, one well (OW1-81), was decommissioned because it had fallen into disrepair because of ground movement in the landfill cap and was no longer functioning. The request was approved and subsequently implemented on September 27, 1991. The phenolics analytical methodology was also changed to the more accurate and specific SW 846 Method 8270.

This report outlines the approach used to fulfill the NYSDEC requirements for operations and maintenance as requested by way of Mr. Sadowski's letter dated October 30, 2012. The purpose of this report is to present the St. Gobain's Operations and Maintenance Plan for the monitoring wells and inspection of the landfill area. We are prepared to implement this plan immediately.

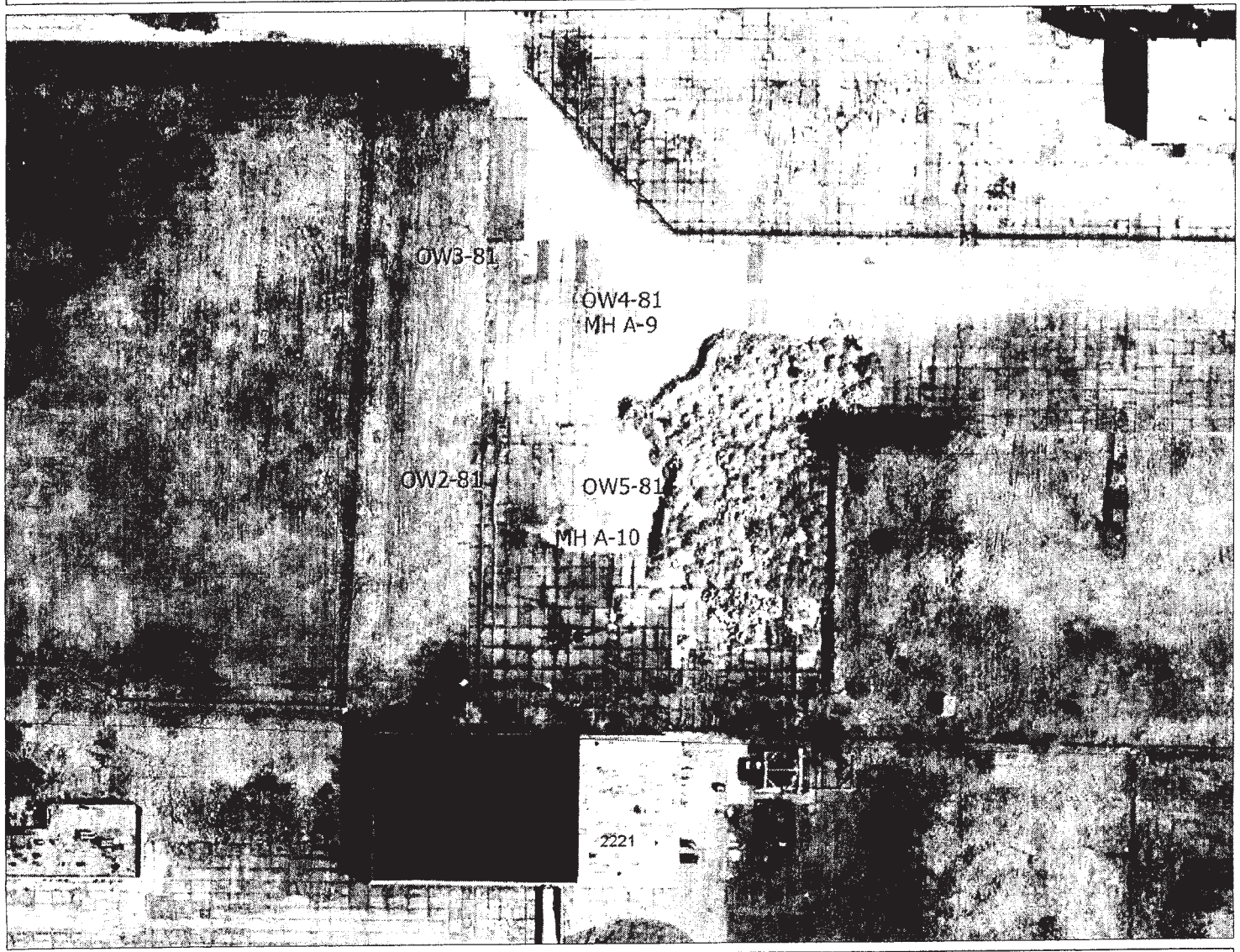
SITE INSPECTION

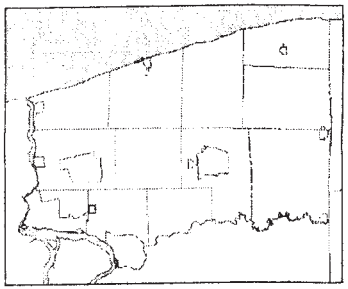
The physical attributes of the site will be inspected annually. This inspection may be conducted by St. Gobain Abrasives Inc. or Frontier Technical Associates, Inc. personnel. The inspection will be conducted in July.

For each monitoring point, the following items will be included: well locks, well casings, covers, concrete pads, bailers and ropes, general conditions and tubing. If any of these items has deteriorated or is in disrepair, they will be replaced or repaired as appropriate. This action will be undertaken as soon as practicable and prior to the next annual inspection. A written report will be prepared and maintained on file at St. Gobain Abrasives Inc.

A monitoring point assessment form to be used for the annual inspection is presented as Figure 2. A copy of this form will be retained for review during NYSDEC inspections.

Figure 1 SCG Landfill Locations





Legend

Streets and Highways
- Interstate
- Primary State Road
- Secondary State Road
- County Road
- Local Road

Parcels

1Ft Color Aerials
- Red: Band_1
- Green: Band_2
- Blue: Band_3

2Ft Color Aerials
- Red: Band_1
- Green: Band_2
- Blue: Band_3

1: 1,414

Notes

Enter Map Description

0.0 0 0.02 0.0 Miles

NIAGARA COUNTY, NEW YORK
DEPARTMENT OF REAL PROPERTY SERVICES

FRONTIER TECHNICAL ASSOCIATES INC.
8675 Main Street Williamsville, NY 14221 (716)634-2293 NYSDOH ELAP No. 10475

Monitoring Point Assessment Form
at Saint-Gobain Abrasives Landfill

Monitoring Point:_____ **Date:_____**

Inspector's Name (Print):_____

Well Locked:	**Yes**	**No**	**NA**
Lock Functioning:	**Yes**	**No**	**NA**
Bailer and Rope OK:	**Yes**	**No**	**NA**
Tubing OK:	**Yes**	**No**	**NA**
Protective Casing OK:	**Yes**	**No**	**NA**
Concrete Pad in Good Condition:	**Yes**	**No**	**NA**
Heaving of Well or Casing:	**Yes**	**No**	**NA**
Well Sand in Purge Water:	**Yes**	**No**	**NA**
Well Constricted:	**Yes**	**No**	**NA**
Debris in Well:	**Yes**	**No**	**NA**
Insects in Well:	**Yes**	**No**	**NA**

Other Observations or Details on Conditions Above: _____

_____

_____

Inspector's Signature:_____

Figure 2

PHYSICAL CONDITION AND GRASS CUTTING

During the annual inspection, observations of the landfill cap will be made to assess whether any soil slumping is present, rodent burrows present, growth of any large rooted vegetation, etc. Brush and bushes will be trimmed and the area will be kept clear of debris or trash which might blow onto the site, etc.

The Department has and continues to encourage all Responsible Parties to cut the grass on their landfills once per year after August 15th. The reason for this is for habitat objectives.

ANNUAL INSPECTION

Once each year, the wells will be purged and depths checked. If depth data indicates infilling of sand or sediment to a depth of 25% of the screen length, the wells will be developed in order to remove the sediment. The wells were last developed in October 1998. Sampling and purging will be conducted in accordance with the following schedule:

Year	Activity
2011	Purging, Sampling
2012	Purging
2013	Purging, Sampling
2014	Purging
2015	Purging, Sampling
2016	Purging
2017	Purging, Sampling
2018	Purging
2019	Purging, Sampling
2020	Purging
2021	Purging, Sampling
2022	Purging

The annual inspection will include the following in addition to purging:

1. Inspection of the well noting any unusual conditions.
2. The depth to the water surface from the top of the riser pipe. The total depth of each well will be checked against previous measurements. If infilling is noted, well development will be scheduled.
3. Each well will be purged to remove suspended sediment and biological growth if present.
4. A peristaltic pump or bailer may be used to purge these shallow wells. All tubing or bailers are dedicated to ensure that no cross-contamination occurs.
5. In years ending with odd numbers, sampling will be conducted in accordance with the sampling and analytical plan and schedule above.

REPORTING

All observations and results made during the annual inspections(s) of the landfill and physical integrity/physical parameters of the monitoring points along with the bi-annual chemistry sampling shall be reported to the Department in one annual report (Periodic Review Report) as it pertains for that year.

SAFETY

Personnel performing the sampling will adhere to all safety requirements for contractors and/or visitors of the St. Gobain facility. Personnel performing the sampling or purging will wear suitable field boots and protective gloves and safety glasses or goggles.

ALS Environmental

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM 3385

1565 Jefferson Road, Building 300, Suite 360 • Rochester, NY 14623 | +1 585 288 5380 +1 585 288 8475 (fax) PAGE _____ OF _____

Project Name	Project Number
Project Manager	Report CC
Company/Address	
Phone #	Email
Sampler's Signature	Sampler's Printed Name

ANALYSIS REQUESTED *(Include Method Number and Container Preservative)*

PRESERVATIVE

CLIENT SAMPLE ID	FOR OFFICE USE ONLY LAB ID	SAMPLING DATE	SAMPLING TIME	MATRIX	NUMBER OF CONTAINERS	GC/MS VOAs ○ 8260 ○ 624 ○ CLP	GC/MS SVOAs ○ 8270 ○ 625	GC VOAs ○ 8021 ○ 601/602	PESTICIDES ○ 8081 ○ 608	PCBs ○ 8082 ○ 608	METALS, TOTAL (List in comments below)	METALS, DISSOLVED (List in comments below)								REMARKS/ ALTERNATE DESCRIPTION

Preservative Key
0. NONE
1. HCL
2. HNO_3
3. H_2SO_4
4. NaOH
5. Zn. Acetate
6. MeOH
7. $NaHSO_4$
8. Other _____

SPECIAL INSTRUCTIONS/COMMENTS
Metals

See QAPP ☐

TURNAROUND REQUIREMENTS
_____ RUSH (SURCHARGES APPLY)
_____ 1 day ____ 2 day ____ 3 day
_____ 4 day ____ 5 day

REQUESTED REPORT DATE
_____

REPORT REQUIREMENTS
____ I. Results Only
____ II. Results + QC Summaries (LCS, DUP, MS/MSD as required)
____ III. Results + QC and Calibration Summaries
____ IV. Data Validation Report with Raw Data

Edata ____ Yes ____ No

INVOICE INFORMATION
PO #
BILL TO:

STATE WHERE SAMPLES WERE COLLECTED

RELINQUISHED BY	RECEIVED BY	RELINQUISHED BY	RECEIVED BY	RELINQUISHED BY	RECEIVED BY
Signature	Signature	Signature	Signature	Signature	Signature
Printed Name	Printed Name	Printed Name	Printed Name	Printed Name	Printed Name
Firm	Firm	Firm	Firm	Firm	Firm
Date/Time	Date/Time	Date/Time	Date/Time	Date/Time	Date/Time

Distribution: White - Lab Copy; Yellow - Return to Originator

FRONTIER TECHNICAL ASSOCIATES INC.

GROUNDWATER SAMPLING AND ANALYSIS

LANDFILL AREA

SAINT GOBAIN ABRASIVES, INC.

FTA Report ET-703-712

October 3, 2013

Prepared For:

Mr. Doug Wright
Saint Gobain Abrasives, Inc.
P.O. Box 301
(6600 Walmore Road)
Niagara Falls, NY 14304

Prepared By:

Frontier Technical Associates, Inc.
8675 Main Street
Williamsville, NY 14221

The test results reported herein were obtained in accordance with the professional standards of the NYELAP certification program. The report was prepared for the use of Saint Gobain Abrasives, Inc. management use only, and except for required regulatory compliance reporting, are not intended for any other purpose.

INTRODUCTION

In response to the requirements of NYSDEC Region 9, Saint Gobain Abrasives, Inc. has completed groundwater sampling and analysis for the landfill area located on the southwest corner of the property in Wheatfield, NY. Figure 1 is ***a sketch*** of the landfill area showing the location of the monitoring wells which were installed in 1981 and the location of the "A" storm sewer line (West Branch) (see fence installed in 2004). Figure 1 B is an ***aerial photo*** of the area with the fence installed. Frontier Technical Associates, Inc. completed the monitoring and field analysis and prepared this report for SGA's submission to the NYSDEC. Previously, FTA had prepared technical reports which described the results of the sampling and analysis for 1991. The NYSDEC subsequently reduced monitoring parameters for 1992. For 1993, the NYSDEC deleted the requirement for analysis of unfiltered groundwater for metals, and for 1994, all metals requirements were deleted and turbidity was added for informational purposes. After the 1997 monitoring episode, SGC requested and received approval to monitor these wells every two years (1999-2009 were subsequently submitted). This report presents the results for the monitoring episode conducted for 2013.

Since 1982, the monitoring wells and adjacent catch basin were sampled for pH and total phenolics (4AAP). In the period 1982-1988 there were no detectable levels of phenolics in monitoring wells OW2-81 through OW5-81. However, in 1989, perhaps as the result of unusual spring and summer precipitation events, low levels of phenolics were detected in the monitoring wells and adjacent catch basins. Again in 1990, low levels of total phenolics were detected. This resulted in the NYSDEC's desire to obtain additional data for evaluation beginning in 1991. Based upon the 1991 results, Well OW1-81 was decommissioned because it had fallen into disrepair and was no longer functioning to monitor the interior of the landfill. The request was approved by the NYSDEC and implemented on September 27, 1991. The phenolic compound analytical methodology was also changed to the more accurate and specific EPA Method 8270.

This report outlines the approach used to fulfill the NYSDEC requirements for 2013. The effort included sampling of four groundwater monitoring wells and one catch basin. The samples collected were all analyzed for pH, specific conductance, temperature, turbidity and phenolic compounds by EPA Method 8270.

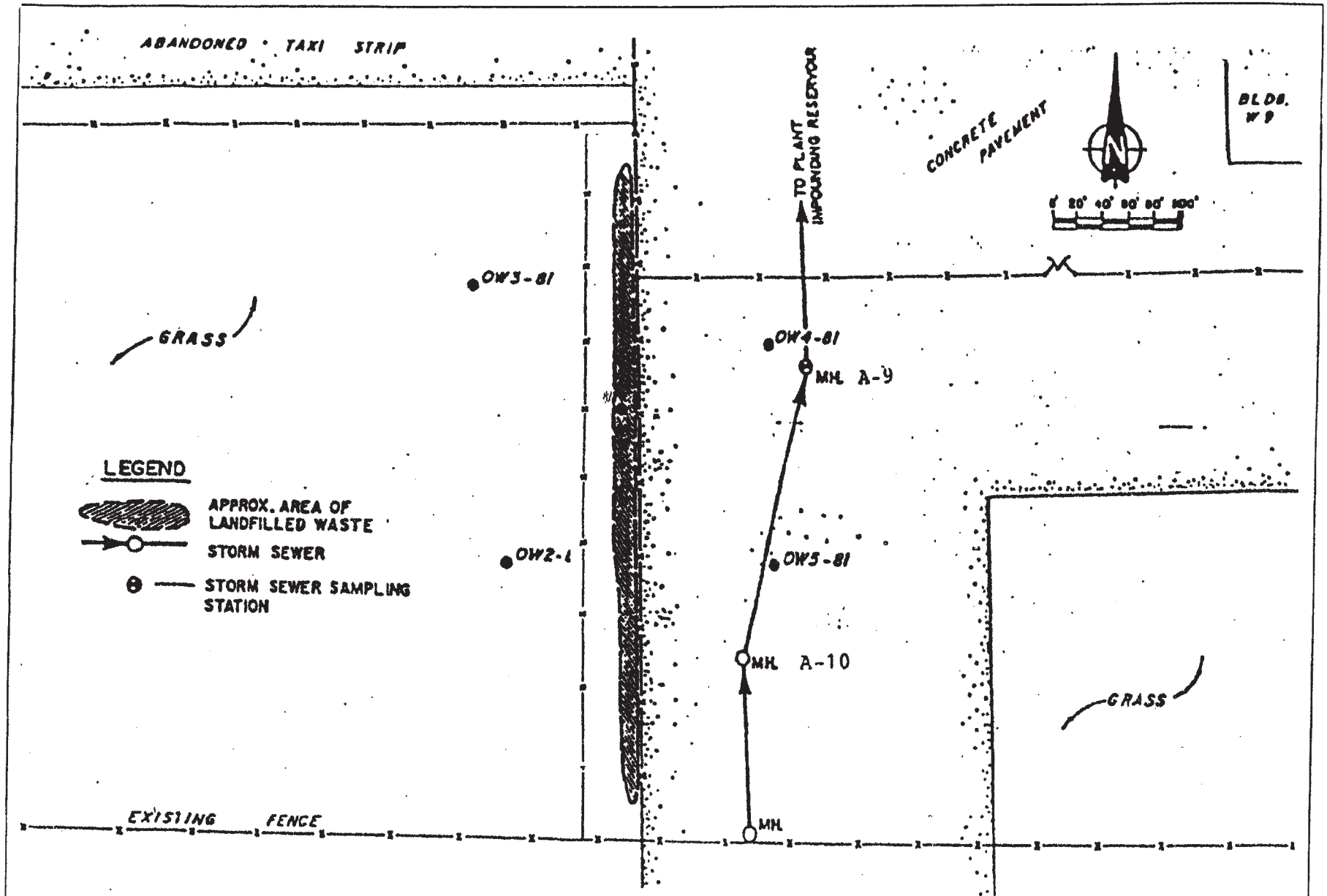
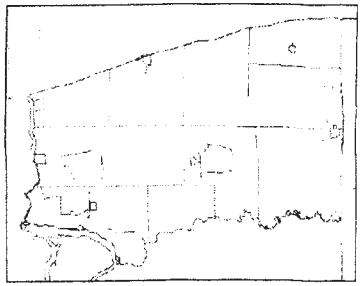


FIGURE 1

WELL LOCATIONS

The Carborundum Company

Figure 1B. SCG Landfill Locations



Legend

Streets and Highways
- Interstate
- Primary State Road
- Secondary State Road
- County Road
- Local Road

Parcels

1Ft Color Aerials
- Red: Band_1
- Green: Band_2
- Blue: Band_3

2Ft Color Aerials
- Red: Band_1
- Green: Band_2
- Blue: Band_3

1: 1,414

Notes

Enter Map Description

0.0 0 0.02 0.0 Miles

NIAGARA COUNTY, NEW YORK
DEPARTMENT OF REAL PROPERTY SERVICES

Field analysis was completed within 15 minutes of sampling. Field data includes pH, temperature, specific conductance and turbidity. These data, as well as well purging reports and groundwater elevation data, are also included this report.

GEOLOGY AND HYDROGEOLOGY

The area in the immediate vicinity of the SGA, Inc. plant is underlain by approximately 10-15 feet of clayey to sandy silt, glacial-lacustrine deposits and till. These deposits thicken southward across the site toward the Niagara River. The hydraulic conductivity of these materials is relatively low, perhaps reaching the range of 10^{-5} to 10^{-8} cm/sec.

The bedrock underlying the site consists of approximately 160 feet of dolomite of the Lockport Formation. The upper zone of the Lockport Formation is generally highly weathered, medium gray dolomite with extensive vertical fractures. It is generally striated on the surface, has extensive partings which are argillaceous or gypsum-coated. Water produced from this upper zone in the Bergholtz area of Wheatfield is generally of very poor quality, with a characteristic odor. The water generally is not suitable for drinking but occasionally is used for watering livestock or agricultural purposes. The Town of Wheatfield has extended its water lines throughout the area and recent information indicates that there are few wells in use throughout the area.

The upper portion of the dolomite sequence consists of 10 to 20 feet of bedrock consisting of thinly bedded dolomite which may produce well yields of 10-20 gpm. Hydraulic conductivities of 0.1 to 0.01 cm/sec may be encountered in this unit. For purposes of this current study, it is not thought that any of the wells penetrate significantly into the bedrock and were either drilled to refusal or into the uppermost few feet of the weathered bedrock. The bedrock surface is generally encountered at elevations between 560 feet to 570 feet MSL and is gently dipping to the south.

The wells monitored in this project were drilled to refusal as indicated in a report by Conestoga-Rovers Associates, who installed the wells in 1981 after placement of a clay cap by Secured Landfill Contractors, Inc. (SLC Contractors). Figure 2 illustrates a typical surficial geologic cross section in the landfill area.

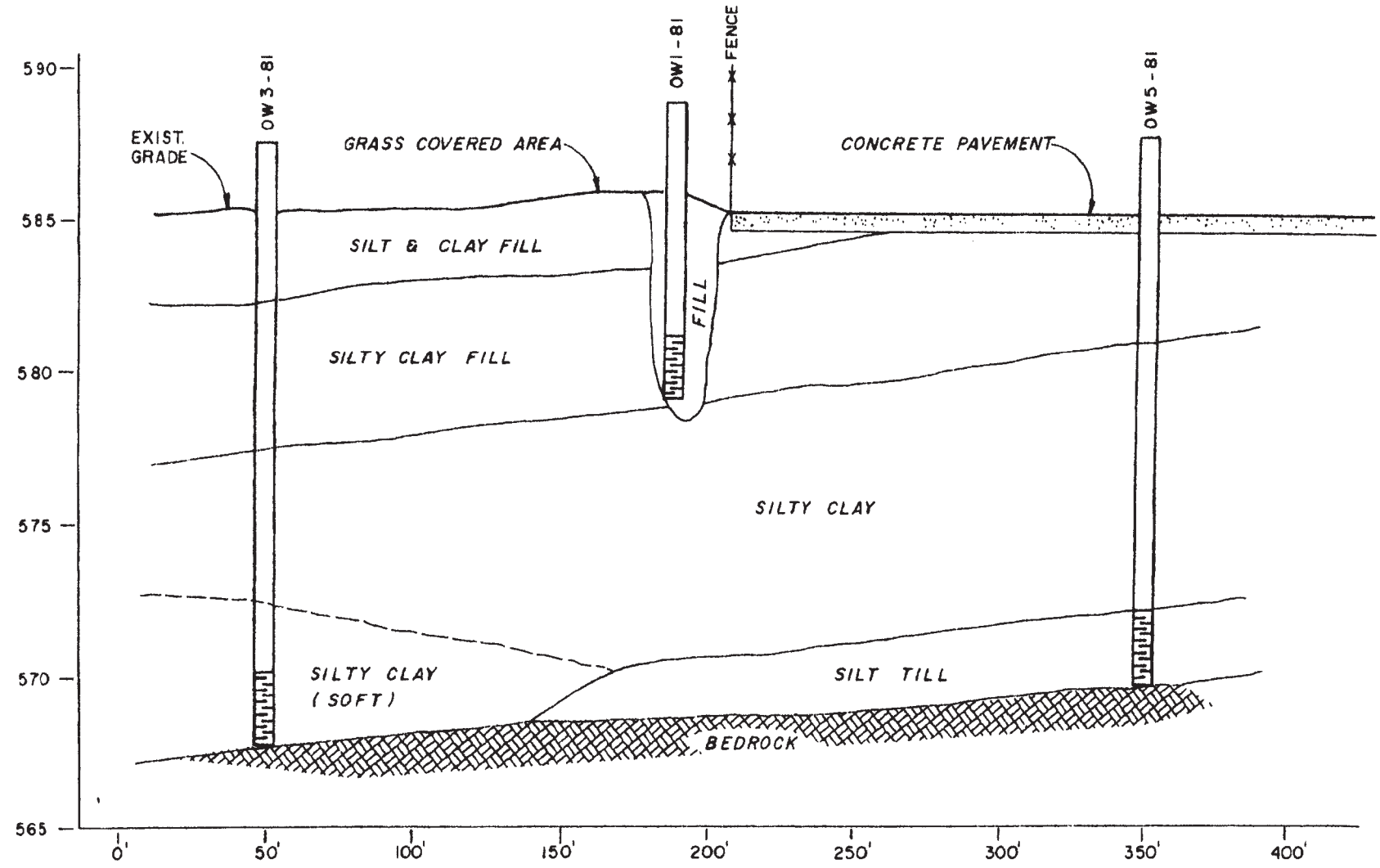


Figure 2

GEOLOGIC CROSS SECTION A - A'

The Carborundum Company

SAMPLING OBJECTIVES

The results of analysis of samples collected and analyzed in accordance with the approval of the NYSDEC are to be used to:

1. Assess the groundwater flow direction and chemistry.

2. Define the nature and extent of pollutant migration, if any.

3. Meet the NYSDEC requirements for data submission.

SAMPLING LOCATIONS

As indicated previously, Figure 1 and 1B illustrate the sample locations. Four wells were sampled together with one catch basin (MH-9 located on the "A" Storm Line). Table 1 presents the sample locations and USEPA analytical methods used for samples from each location. All methods used conformed to the USEPA Methods of Analysis for Water and Wastewater (40 CFR Part 136) or SW-846 (as revised). Table 2 is a summary of the parameters, methods used, preservation methods, and holding times required.

SAMPLING EQUIPMENT AND PROCEDURES

The procedures outlined here were developed to minimize contamination of water sampling equipment and analyses, minimize concentration changes prior to testing, and standardize procedures to minimize analytical differences.

The procedures below outline the purging, sampling, and preservation methods used during this sampling program in accordance with the approved sampling plan submitted and approved in 1991 and revised in 1999:

1. Inspection of the well noting any unusual conditions.

2. The water level indicating device and the bottom foot or more of cable was triple rinsed with distilled water.

3. The depth to the water surface from the top of the riser pipe was measured and recorded on the Sample Collection Form. Depth to the bottom of each well was also measured.

4. The volume of water in each well was calculated. Each well was purged by

Table 1. Sample Locations and Parameters Analyzed.

Well Designation	Well Depth (ft)*	Analytical Parameters**
OW2-81	18.20	pH, SC, Phenols (625) Temp., Turbidity
OW3-81	19.66	pH, SC, Phenols (625) Temp., Turbidity
OW4-81	19.38	pH, SC, Phenols (625) Temp., Turbidity
OW5-81	18.23	pH, SC, Phenols (625) Temp., Turbidity
MH A-9	-----	pH, SC, Phenols (625) Temp., Turbidity

* Based upon measurement by FTA in 1998; rechecked in 2000 and 2003; measured from top of riser pipe.

** Field measurement of pH made within NYELAP guidelines (15 minutes); Turbidity measured using a nephelometer in the field.

SC = Specific Conductance
Phenols = Phenol Compounds as measured by EPA Method 8270/625.
Temp. = Temperature

Table 2. Summary of Parameters, Methods, Preservation Methods and Holding Times.

Parameter	EPA Method	Preservation	Holding Time
pH*	SM 4500 H B	4°C	15 Minutes (Field)
Specific Conductance	120.1	4°C	6 Hours (Field)
Temperature*	SM2550B	---	Immediately (Field)
Turbidity	180.1	4°C	48 Hours
Phenol Compounds	8270	4°C	5 days to extract 21 days to analyze

* pH, Specific Conductance, and temperature were measured immediately in the field. Temperature measurements were used with cell constant correction to correct specific conductance measurements to 25°C. Frontier Technical Associates, Inc. is a NYELAP-Certified Laboratory (10475).

removing three times this volume, or if the well yield was low, water was removed until the well was "dry" (within 1-2 inches of the bottom).

5. A peristaltic pump was used to purge these shallow wells. All tubing coming into contact with the well water consisted of food-grade polyethylene tubing dedicated to the well. This dedicated tubing is intended to eliminate cross-contamination between the wells. The tubing was gradually lowered into the well as pumping continued. The volume required, volume obtained, water level before purging, and the start and stop times were also recorded.

6. All purge water was placed in a container specifically used for that well and for measuring purge volume. If the well contained very little volume, this water was reserved for pH, specific conductance and turbidity determination. After a time had elapsed for sufficient recovery, sampling was completed. Based upon results of the analyses performed over the past decade, the water contains no parameters which might be incompatible with the treatment process or SGA's sanitary sewage permit, and is acceptable to the NCSD #1 and meets their criteria. The water was then disposed of in the sanitary sewer.

7. Groundwater samples were obtained by dedicated tubing. No equipment was used for more than one well location.

8. Usually, the first sample was taken for analysis of pH, temperature, specific conductance and turbidity. Probes were triple rinsed with distilled water after use. The temperature measurement was used to correct specific conductance to 25°C together with a determination of cell constant compared to a reference standard. A standard reporting form with all field data is provided for each well and sample location (See Appendix).

9. Temperature, specific conductance, turbidity and pH were reported on the form along with the equipment used, weather conditions, field observations, and sampling times.

11. Sample container labels were affixed to the sample container and the samples placed in an insulated container where they were kept cool with ice if temperatures were above 4°C.

12. In a similar fashion, samples were obtained for phenolic compounds as required for each sample location. Each sample label was completed including the date, time, location, analysis required, and sampler's initials.

Table 3. Sample Containers and Required Sample Volume.

Parameter	Sample Volume	No. of Containers
pH, Specific Conductance	1,000 ml	1
Phenols	1,000 ml	1
Turbidity*	25 ml	1

* Subsample of pH and Specific Conductance sample.

13. All samples were packed in an insulated cooler with sufficient ice to ensure a temperature of 4°C during storage and transport to the laboratory.

15. Analyses were completed within the specified holding times. The laboratory was notified by the sampling team prior to sampling and upon shipping to assist in scheduling analyses to meet all specified holding times.

SAMPLE CUSTODY

Field sampling data and purging was documented on a Well Monitoring Field Form. The following information was included:

1. Site name (Saint Gobain Abrasives, Inc.), sample number, etc;

2. Date, time, and elapsed time from purge start to finish;

3. Information regarding the well groundwater level, purge volume required, and actual purge volume;

4. Field test results including pH, temperature, turbidity and specific conductance;

5. Sampling method used; the materials of construction of special equipment (in margin);

6. Type of sample and information which appears significant;

7. Field observations/sampling conditions (e.g. weather)

8. Appearance of sample such as color, sediment, oil on surface, obvious odor, etc.

9. Sampler's identity and signature.

In order to maintain integrity of the groundwater samples, strict chain-of-custody procedures were followed. From the time the sample was collected until the sample was in the custody of the analytical laboratory, the samples were:

1. In the sampler's possession;

2. In the sampler's view, after being in his possession;

3. In the sampler's possession and then locked in a designated, secure area to prevent tampering; or in a sample cooler sealed with a tamper proof chain-of-custody seal.

A written Chain-of-Custody Record of the transfer of samples was maintained with a copy in the Appendix to this report.

The Chain-of-Custody Record was transported with the sample container at the time the sample was collected. When transferring the possession of the samples, the person making the transfer signed and recorded the date and time on the record. The number of custodians in the chain of possession were as few as possible.

SAFETY

Personnel performing the sampling adhered to all safety requirements for contractors and/or visitors of the facility. Personnel performing the sampling wore suitable personal protective equipment.

ANALYTICAL LABORATORIES

The pH, temperature, turbidity and specific conductance were measured in the field by Ronald B. Blinston of Frontier Technical Associates, Inc., NYELAP # 10475, Kathy Wager, Laboratory Director. The phenol compound analyses (EPA 8270) were performed by ALS Environmental (formerly Columbia Analytical Services, Inc.), NYELAP # 10145. Each laboratory was certified for the parameters for which data were provided.

FIELD SAMPLING PERSONNEL

All field sampling and field measurements were performed by the following:

Ronald B. Blinston and Kathy Wager

RESULTS OF GROUNDWATER ANALYSIS

Groundwater Elevations

Groundwater elevations were measured at the arrival at each well and recorded. These data were initially used to determine the required purge volume since the well depths are known. The data are summarized in Table 4. The data obtained here support the previous observations that, historically, the movement of groundwater is generally from the southwest to the northeast in the landfill vicinity. Typically, well OW2-81 exhibits the highest groundwater elevations from year-to-year compared to the other wells while OW4-81 generally exhibits the lowest elevation. Thus, groundwater generally is moving from southwest to northeast. For this monitoring period, the movement is generally southwest to east-northeast (Figure 3).

pH, Turbidity and Specific Conductance

Analysis for pH and specific conductance were completed within 15 minutes of sampling in the field. Turbidity analyses were completed within EPA-prescribed holding times. The field data sheets documenting the analyses are included in the Appendix. Table 5 summarizes all pH, turbidity, and specific conductance data obtained on the sample date. Field sheets with the measurements are presented in Appendix I. Turbidity values were measured directly. The pH measurements were within the typical range expected and previously encountered for waters in this area. The specific conductance values for the wells were similar to past data and to other wells drilled to refusal or to the upper few feet of bedrock in this area. These waters are often highly mineralized. The catch basin also yielded values which were characteristic of rain water accumulation.

Phenol Compounds

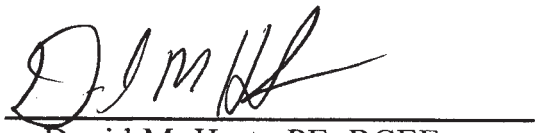
Table 6 is a summary of the analysis for phenol compounds (Complete data are contained in Appendix). EPA Method 8270 was used for analysis of these compounds. There were no detectable concentrations of phenol, the primary parameter analyzed, above minimum detection or quantitation limits in all samples analyzed including the duplicate sample obtained at Well OW4-81. Surrogate recovery data indicated acceptable recoveries of spiked compounds.

The data are consistent with the data collected over the last 21+ years, and there is no reason to believe with the low detection limits reported here, that phenol compounds are migrating from the landfill.

Table 4. Groundwater Elevations at Saint Gobain Abrasives, Inc. (August 16, 2013).

Date	Well No.	Top of Pipe Elevation	Depth to Water Surface	Groundwater Elevation
08/16/13	OW2-81	588.50	7.43	581.07
08/16/13	OW3-81	587.59	7.28	580.31
08/16/13	OW4-81	587.74	10.00	577.74
08/16/13	OW5-81	587.52	10.43	577.09

The groundwater elevation data presented above were obtained under my supervision and represent, to the best of my knowledge, accurate measurements for the date listed.



David M. Harty PE, BCEE

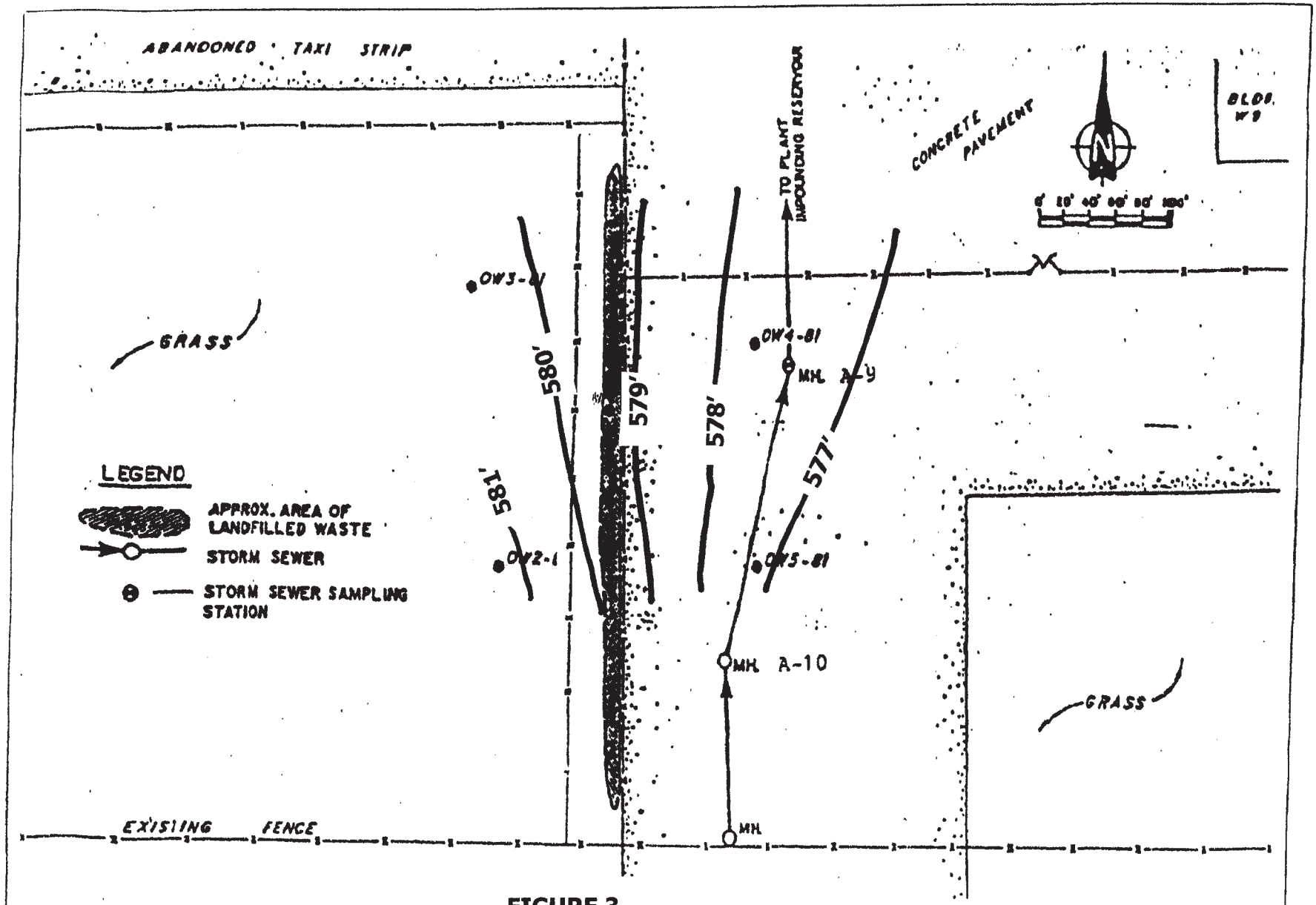


FIGURE 3.
PIEZOMETRIC SURFACE – GROUNDWATER ELEVATION CONTOURS
(August 16, 2013)

Table 5. Field Monitoring Data at Saint Gobain Abrasives Inc. (August 16, 2013).

Well No.	pH (SU)	Spec. Conductance (umho/cm)	Turbidity (NTU)
OW2-81	7.11	3,760	31.9
OW3-81	7.00	3,150	250
OW4-81	10.88	1,946	over range
OW5-81	6.01	6,270	over range
MH A-9	6.87	664	2.79

Notes:

1. pH, specific conductance and turbidity analyses performed by Ronald B. Blinston/Kathy Wager immediately upon sampling.

Kathy Wager
Laboratory Director
NYELAP # 10475

Table 6. Results for Phenol Compound Analysis at SGA, Inc. (EPA Method 8270).

Location	Concentration (mg/l) All Phenol Compounds*
OW2-81	ND
OW3-81	ND
OW4-81	ND
OW4-81(Dupl)	ND
OW5-81	ND
MH A-9	ND
Method Blank	ND

ND = None of the 14 phenolic compounds detected by this method were present above laboratory quantitation levels for each sample (See Analytical Report).

MS/MSD Recovery: All acceptable and nearly identical. (See Analytical Report)

Method Blank: ND for all compounds(See Analytical Report).

MRL = Minimum Reporting Level
MDL = Minimum Detection Level

Note: Values detected above the MDL but below the MRL are reported as "J" concentrations. There were no phenol compounds detected in this range.

The recoveries of spiked surrogate compounds in the set of samples analyzed from the site were very similar. Duplicate analysis performed on OW4-81 indicated consistant results with the separate sample. Blank spike recoveries were also within QC limits and indicated agreement with surrogate recoveries. The monitoring wells appear to have a dark, biological particulate material. The method blank also had no detectable phenol.

Based upon analysis of phenol compounds and use of the previous method (4AAP), it is believed that EPA Method 8270, which is not subject to the same interferences of the former method, accurately reflects the concentrations of the phenolic compounds of concern. It should be noted that historically only "phenol" resins were used in the resins and materials disposed in the landfill. The other compounds, particularly chlorinated phenols, were not used and have never been detected. Other substances present in groundwater including biological materials may produce false positive detections by the 4AAP test as seen in previous analysis by both methods at this site. Colorimetric methods such as the 4AAP method are subject to many interferences, and thus are not recommended nor used for monitoring at this site.

Quality Assurance/Quality Control

As part of the QA/QC activities associated with the 2011 sampling episode, a field duplicate was obtained at Well OW4-81, surrogate recoveries were reported, and a method blank was analyzed for this batch. A matrix spike and matrix spike duplicate was performed on laboratory control sample water. Analysis for all these samples was by EPA Method 8270. pH, Temperature, specific conductance and turbidity were reported. However, there was little to no little variation noted in the data.

The analytical data presents the results of the analyses performed by the laboratory including the field duplicate, surrogate recoveries, method blank, etc. Duplicate samples were taken at Well OW4-81 with identical results.

SUMMARY

The well and catch basin samples obtained during this sampling program did not exhibit levels above the quantitation limits of any of the phenol compounds as measured by EPA Method 8270 (see Appendix—Lab Report).

The four wells surrounding the former landfill did not contain detectable levels of phenol or any of the phenol compounds analyzed. Method blank, matrix spike and matrix spike duplicate results were within EPA acceptance criteria. The results are identical to monitoring data for 1997, 1999, 2001, 2003, 2005, 2007, 2009 and 2011. MH 9 also did not exhibit detectable levels of phenol compounds. Based upon these data, together with the last six monitoring episodes covering eleven years, we conclude that the containment of the landfilled phenolic materials in the low permeability, silty-clay subsoil must be effective. The cap appears to be functioning as designed and shows no evidence of settling or dessication cracking. There is no significant vegetation present with long tap roots. Continued grass cutting has kept vegetation under control.

New concrete pads installed in 1999 at Wells OW2-81 and OW3-81 by Frontier Technical Associates, Inc. has remained intact. The riser for Well OW4-81 was replaced and repaired in 2004 due to a vehicle collision. Some cracking may be present in the well pads. Annual inspections of the landfill area continue under the supervision of Saint Gobain Abrasives Co. and are conducted by Frontier Technical Associates, Inc.

Groundwater associated with the Lockport Dolomite is highly mineralized as evidenced by the specific conductance values measured which indicates the concentration of dissolved solids present. This is consistent with previous data from this site and data available for wells in the immediate vicinity.

As a result of evaluation of the data recovered, the following is concluded:

1. Sampling of the four existing monitoring wells in 2013 and quantification of the phenolic compounds again showed no detectable levels of any of the compounds above detectable or quantitation limits.

2. Groundwater data indicate no migration of materials from the former landfill. This confirms after 28 years of monitoring that the containment and cap is effective

3. Any future monitoring for phenols should continue to use EPA Method 625/8270.

4. There is no data developed within the past several years that would indicate a need to alter the current monitoring frequency (every two years).

5. pH measurements during this episode indicate elevated pH values at Well OW4-81. Repair and replacement of the riser for this well was completed during the Fall of 2004. It is believed that the bentonite-cement grout and water migrating along the casing contributed to the rise in pH at this location.

APPENDIX

Well Purging Reports, Field Forms and Notes

Laboratory Report and Chain of Custody Forms

FRONTIER TECHNICAL ASSOCIATES, INC.
WELL MONITORING FIELD FORM

Site Location: Saint-Gobain Abrasives Landfill Job No: ET- 703
Sample Point ID: MH-9 Consultant: **Frontier Technical Associates, Inc.**
SAMPLING INFORMATION Sample Method: Bailer, Peristaltic Pump, Bladder Pump
Sample Date: 8/16/13 Sample Time: 10:47 Depth to Water Surface — ft.
Sample Appearance: clear
Samples Preserved: Yes No
Sampling Personnel: Ron Olinsky

FIELD MEASUREMENTS
Meters Calibrated Yes No

PARAMETER	METER NUMBER	UNITS	MEASUREMENT	NOTES
pH	~~Hanna HI9023~~ Oakton	STD. UNITS	6.87	
Spec. Conductance	Oakton Con6	µMHOS/CM	664	
Temperature	Uei 550	°F	70.6	
Turbidity	Hach 2100P	NTU	2.79	

Weather:
Notes:

FRONTIER TECHNICAL ASSOCIATES, INC.
WELL MONITORING FIELD FORM

Site Location: Saint-Gobain Abrasives Landfill Job No: ET- 703

Sample Point ID: OW-2 Consultant: **Frontier Technical Associates, Inc.**

PURGE INFORMATION Purge Method: Bailer, (Peristaltic Pump)

Depth to Bottom of Well: 18.20 ft. 2" Well = 0.17 gals/ft.

Depth to Water Surface: 7.43 ft.

Depth of Water Column: 10.77 ft.

Volume of Standing Water in Well: 1.8 gallons

Start of Purge: Date: 8/16/13 Time: 9:26

End of Purge: Date: 8/16/13 Time: 9:29

Total Volume Purge: 1.8 gallons Well Purged Dry?: (Yes) No

# of Volumes Purged 1 Purging Personnel: Ron Blinston

Recharge Rate: Rapid, Slow, (Extremely Slow)

SAMPLING INFORMATION Sample Method: Bailer, (Peristaltic Pump), Bladder Pump

Sample Date: 8/16/13 Sample Time: 9:29 Depth to Water Surface 16.27 ft.

Sample Appearance: blackish

Samples Preserved (Yes) No

Sampling Personnel: Ron Blinston

FIELD MEASUREMENTS

Meters Calibrated (Yes) No

PARAMETER	METER NUMBER	UNITS	MEASUREMENT	NOTES
pH	~~Hanna HI9023~~ Oakton RW	STD. UNITS	7.11 (7.07)	
Spec. Conductance	Oakton Con6	μMHOS/CM	3760	
Temperature	Uei 550	°F	53.6	
Turbidity	Hach 2100P	NTU	31.9	

Weather: bottom depth of well 17.07

Notes: pH cal 4.00/7.00/10.08 (check only); turb 20 std read 20.9 NTU
Con 6 cond 1.00

FRONTIER TECHNICAL ASSOCIATES, INC.
WELL MONITORING FIELD FORM

Site Location: Saint-Gobain Abrasives Landfill Job No: ET- 703
Sample Point ID: OW-3 Consultant: **Frontier Technical Associates, Inc.**

PURGE INFORMATION Purge Method: Bailer, Peristaltic Pump
Depth to Bottom of Well: 19.66 ft. 2" Well = 0.17 gals/ft.
Depth to Water Surface: 7.28 ft.
Depth of Water Column: 12.38 ft.
Volume of Standing Water in Well: 2.1 gallons
Start of Purge: Date: 8/14/13 Time: 9:50
End of Purge: Date: 8/14/13 Time: 9:57
Total Volume Purge: 1.7 gallons Well Purged Dry? Yes No
# of Volumes Purged .81 Purging Personnel: Ron Blinston
Recharge Rate: Rapid, Slow, Extremely Slow

SAMPLING INFORMATION Sample Method: Bailer, Peristaltic Pump, Bladder Pump
Sample Date: 8/14/13 Sample Time: 9:57 Depth to Water Surface 19.38 ft.
Sample Appearance: blackish
Samples Preserved: Yes No
Sampling Personnel: Ron Blinston

FIELD MEASUREMENTS
Meters Calibrated: Yes No

PARAMETER	METER NUMBER	UNITS	MEASUREMENT	NOTES
pH	~~Hanna HI9023~~ Oakton pHW	STD. UNITS	7.00	
Spec. Conductance	Oakton Con6	µMHOS/CM	3150	
Temperature	Uei 550	°F	57.6	
Turbidity	Hach 2100P	NTU	250	

Weather: 65 F sunny light breeze Well bottom depth - 19.66'
Notes: concrete pad corner broken off; well leaning

FRONTIER TECHNICAL ASSOCIATES, INC.
WELL MONITORING FIELD FORM

Site Location: Saint-Gobain Abrasives Landfill Job No: ET- 703
Sample Point ID: OW-4 Consultant: **Frontier Technical Associates, Inc.**

PURGE INFORMATION Purge Method: Bailer, Peristaltic Pump
Depth to Bottom of Well: 19.38 ft. 2" Well = 0.17 gals/ft.
Depth to Water Surface: 10.00 ft.
Depth of Water Column: 9.38 ft.
Volume of Standing Water in Well: 1.6 gallons
Start of Purge: Date: 8/10/13 Time: 10:55
End of Purge: Date: 8/10/13 Time: 10:59
Total Volume Purge: 1.7 gallons Well Purged Dry?: Yes No
# of Volumes Purged 1+ Purging Personnel: Ron Blinston
Recharge Rate: Rapid, Slow, Extremely Slow

SAMPLING INFORMATION Sample Method: Bailer, Peristaltic Pump, Bladder Pump
Sample Date: 8/10/13 Sample Time: 1:45 Depth to Water Surface dry ft.
Sample Appearance: black
Samples Preserved: Yes No
Sampling Personnel: Ron Blinston

FIELD MEASUREMENTS
Meters Calibrated: Yes No

PARAMETER	METER NUMBER	UNITS	MEASUREMENT	NOTES
pH	~~Hanna HI9023~~ Oakton	STD. UNITS	10.88	
Spec. Conductance	Oakton Con6	µMHOS/CM	1946	
Temperature	Uei 550	°F	65	
Turbidity	Hach 2100P	NTU	>999	

Weather: well bottom depth 19.2
Notes: Dup

FRONTIER TECHNICAL ASSOCIATES, INC.
WELL MONITORING FIELD FORM

Site Location: Saint-Gobain Abrasives Landfill Job No: ET- 703
Sample Point ID: OW-5 Consultant: **Frontier Technical Associates, Inc.**

PURGE INFORMATION Purge Method: Bailer, ~~Peristaltic Pump~~
Depth to Bottom of Well: 18.23 ft. 2" Well = 0.17 gals/ft.
Depth to Water Surface: 10.43 ft.
Depth of Water Column: 7.80 ft.
Volume of Standing Water in Well: 1.3 gallons
Start of Purge: Date: 8/14/13 Time: 10:34
End of Purge: Date: 8/14/13 Time: 10:36
Total Volume Purge: 1.2 gallons Well Purged Dry?: Yes No
# of Volumes Purged 4 Purging Personnel: Ron Blinston
Recharge Rate: Rapid, Slow, Extremely Slow

SAMPLING INFORMATION Sample Method: Bailer, ~~Peristaltic Pump~~, Bladder Pump
Sample Date: 8/14/13 Sample Time: 10:36 Depth to Water Surface 17.41 ft.
Sample Appearance: black; organic odor
Samples Preserved: Yes No
Sampling Personnel: Ron Blinston

FIELD MEASUREMENTS
Meters Calibrated Yes No

PARAMETER	METER NUMBER	UNITS	MEASUREMENT	NOTES
pH	~~Hanna HI9023~~ Oakton	STD. UNITS	6.01	
Spec. Conductance	Oakton Con6	µMHOS/CM	6270	
Temperature	Uei 550	°F	60.4	
Turbidity	Hach 2100P	NTU	>999	

Weather: well bottom depth 17.71
Notes:

FRONTIER TECHNICAL ASSOCIATES INC.
8675 Main Street Williamsville, NY 14221 (716)634-2293 NYSDOH ELAP No. 10475

Monitoring Point Assessment Form
at Saint-Gobain Abrasives Landfill

Monitoring Point: OW-2 **Date:** 8/14/13

Inspector's Name (Print): Kathy Unger

Well Locked:	**Yes**	**No**	**NA**
Lock Functioning:	**Yes**	**No**	**NA**
Bailer and Rope OK:	**Yes**	**No**	**NA**
Tubing OK:	**Yes**	**No**	**NA**
Protective Casing OK:	**Yes**	**No**	**NA**
Concrete Pad in Good Condition:	**Yes**	**No**	**NA**
Heaving of Well or Casing:	**Yes**	**No**	**NA**
Well Sand in Purge Water:	**Yes**	**No**	**NA**
Well Constricted:	**Yes**	**No**	**NA**
Debris in Well:	**Yes**	**No**	**NA**
Insects in Well:	**Yes**	**No**	**NA**

Other Observations or Details on Conditions Above: _____

Inspector's Signature: Kathy Unger

FRONTIER TECHNICAL ASSOCIATES INC.
8675 Main Street Williamsville, NY 14221 (716)634-2293 NYSDOH ELAP No. 10475

Monitoring Point Assessment Form
at Saint-Gobain Abrasives Landfill

Monitoring Point: OW-3 **Date:** 8/16/13

Inspector's Name (Print): Kathy Wager

Well Locked:	(Yes)	No	NA
Lock Functioning:	(Yes)	No	NA
Bailer and Rope OK:	Yes	No	(NA)
Tubing OK:	(Yes)	(No)	NA – CRACKED
Protective Casing OK:	(Yes)	No	NA
Concrete Pad in Good Condition:	Yes	(No)	NA
Heaving of Well or Casing:	Yes	(No)	NA
Well Sand in Purge Water:	Yes	(No)	NA
Well Constricted:	Yes	(No)	NA
Debris in Well:	Yes	(No)	NA
Insects in Well:	Yes	(No)	NA

Other Observations or Details on Conditions Above:

CASING IS CROOKED

Inspector's Signature: Kathy Wager

FRONTIER TECHNICAL ASSOCIATES INC.
8675 Main Street Williamsville, NY 14221 (716)634-2293 NYSDOH ELAP No. 10475

Monitoring Point Assessment Form
at Saint-Gobain Abrasives Landfill

Monitoring Point: OW-4 **Date:** 8/16/13

Inspector's Name (Print): Kathy Wozer

Well Locked:	**Yes**	**No**	**NA**
Lock Functioning:	**Yes**	**No**	**NA**
Bailer and Rope OK:	**Yes**	**No**	**NA**
Tubing OK:	**Yes**	**No**	**NA**
Protective Casing OK:	**Yes**	**No**	**NA**
Concrete Pad in Good Condition:	**Yes**	**No**	**NA**
Heaving of Well or Casing:	**Yes**	**No**	**NA**
Well Sand in Purge Water:	**Yes**	**No**	**NA**
Well Constricted:	**Yes**	**No**	**NA**
Debris in Well:	**Yes**	**No**	**NA**
Insects in Well:	**Yes**	**No**	**NA**

Other Observations or Details on Conditions Above: _____

Inspector's Signature: Kathy Wozer

FRONTIER TECHNICAL ASSOCIATES INC.
8675 Main Street Williamsville, NY 14221 (716)634-2293 NYSDOH ELAP No. 10475

Monitoring Point Assessment Form
at Saint-Gobain Abrasives Landfill

Monitoring Point: OW-5 **Date:** 8/14/13

Inspector's Name (Print): Kathy Wagner

Well Locked:	**Yes**	**No**	**NA**
Lock Functioning:	**Yes**	**No**	**NA**
Bailer and Rope OK:	**Yes**	**No**	**NA**
Tubing OK:	**Yes**	**No**	**NA**
Protective Casing OK:	**Yes**	**No**	**NA**
Concrete Pad in Good Condition:	**Yes**	**No**	**NA**
Heaving of Well or Casing:	**Yes**	**No**	**NA**
Well Sand in Purge Water:	**Yes**	**No**	**NA**
Well Constricted:	**Yes**	**No**	**NA**
Debris in Well:	**Yes**	**No**	**NA**
Insects in Well:	**Yes**	**No**	**NA**

Other Observations or Details on Conditions Above:

hinge side of well cap broken; well was open upon arrival

Inspector's Signature: Kathy Wagner

August 29, 2013

Service Request No: R1306051

Ms. Kathy Wager
Frontier Technical Associates
8675 Main Street
Williamsville, NY 14221

Laboratory Results for: Plant C Landfill/ET-703

Dear Ms. Wager:

Enclosed are the results of the sample(s) submitted to our laboratory on August 20, 2013. For your reference, these analyses have been assigned our service request number **R1306051**.

All analyses were performed according to our laboratory's quality assurance program. The test results meet requirements of the NELAP standards except as noted in the case narrative report. All results are intended to be considered in their entirety, and ALS Environmental (ALS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report. The measurement uncertainty of the results included in this report is within that expected when using the prescribed method(s) for analysis of these samples, and represented by Laboratory Control Sample control limits. Any events, such as QC failures, which may add to the uncertainty are explained in the report narrative.

Please contact me if you have any questions. My extension is 7473. You may also contact me via email at Deb.Patton@alsglobal.com.

Respectfully submitted,

ALS Group USA Corp. dba ALS Environmental

Deb Patton
Project Manager

ADDRESS 1565 Jefferson Rd, Building 300, Suite 360, Rochester, NY 14623 PHONE 585-288-5380 | FAX 585-288-8475
ALS GROUP USA, CORP. Part of the ALS Group An ALS Limited Company

ALS Environmental

Client:	Frontier Technical Associates	**Service Request No.:**	R1306051
Project:	Plant C Landfill	**Date Received:**	8/20/13
Sample Matrix:	Water		

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of ALS Environmental. This report contains analytical results for samples designated for Tier II data deliverables. When appropriate to the method, method blank results have been reported with each analytical test. Surrogate recoveries have been reported for all applicable organic analyses. Additional quality control analyses reported herein include: Laboratory Control Sample (LCS)/Duplicate Laboratory Control Sample (DLCS).

Sample Receipt

Six water samples were received for analysis at ALS Environmental on 8/20/13. The samples were received in good condition and consistent with the accompanying chain of custody form. The samples were stored in a refrigerator between 1°C and 6°C upon receipt at the laboratory.

Extractable Organics

Batch QC is included in the report. The RPD for the LCS/DLCS for compound 2,4-Dimethylphenol was outside of the control limits and has been flagged with a "*". Both the LCS and DLCS were within limits and no data was affected.

The Method Blank was free of contamination.

No other analytical or quality control problems were encountered during analysis.

Approved by _____ Date 8/29/13

CASE NARRATIVE

This report contains analytical results for the following samples:
Service Request Number: R1306051

Lab ID	Client ID
R1306051-001	OW-2
R1306051-002	OW-3
R1306051-003	OW-4
R1306051-004	OW-5
R1306051-005	MH-7
R1306051-006	DUP

ALS Environmental

REPORT QUALIFIERS AND DEFINITIONS

U Analyte was analyzed for but not detected. The sample quantitation limit has been corrected for dilution and for percent moisture, unless otherwise noted in the case narrative.

J Estimated value due to either being a Tentatively Identified Compound (TIC) or that the concentration is between the MRL and the MDL. Concentrations are not verified within the linear range of the calibration. For DoD: concentration >40% difference between two GC columns (pesticides/Arclors).

B Analyte was also detected in the associated method blank at a concentration that may have contributed to the sample result.

E Inorganics- Concentration is estimated due to the serial dilution was outside control limits.

E Organics- Concentration has exceeded the calibration range for that specific analysis.

D Concentration is a result of a dilution, typically a secondary analysis of the sample due to exceeding the calibration range or that a surrogate has been diluted out of the sample and cannot be assessed.

* Indicates that a quality control parameter has exceeded laboratory limits. Under the "Notes" column of the Form I, this qualifier denotes analysis was performed out of Holding Time.

H Analysis was performed out of hold time for tests that have an "immediate" hold time criteria.

Spike was diluted out.

\+ Correlation coefficient for MSA is <0.995.

N Inorganics- Matrix spike recovery was outside laboratory limits.

N Organics- Presumptive evidence of a compound (reported as a TIC) based on the MS library search.

S Concentration has been determined using Method of Standard Additions (MSA).

W Post-Digestion Spike recovery is outside control limits and the sample absorbance is <50% of the spike absorbance.

P Concentration >40% (25% for CLP) difference between the two GC columns.

C Confirmed by GC/MS

Q DoD reports: indicates a pesticide/Aroclor is not confirmed (≥100% Difference between two GC columns).

X See Case Narrative for discussion.

MRL Method Reporting Limit. Also known as:
LOQ Limit of Quantitation (LOQ)
The lowest concentration at which the method analyte may be reliably quantified under the method conditions.

MDL Method Detection Limit. A statistical value derived from a study designed to provide the lowest concentration that will be detected 99% of the time. Values between the MDL and MRL are estimated (see J qualifier).

LOD Limit of Detection. A value at or above the MDL which has been verified to be detectable.

ND Non-Detect. Analyte was not detected at the concentration listed. Same as U qualifier.

ACCREDITED IN ACCORDANCE WITH nelac

Rochester Lab ID # for State Certifications[1]

NELAP Accredited	Maine ID #NY0032	New Hampshire ID # 294100 A/B
Connecticut ID # PH0556	Nebraska Accredited	
Delaware Accredited	Nevada ID # NY-00032	North Carolina #676
DoD ELAP #65817	New Jersey ID # NY004	Pennsylvania ID# 68-786
Florida ID # E87674	New York ID # 10145	Rhode Island ID # 158
Illinois ID #200047		Virginia #460167

[1] Analyses were performed according to our laboratory's NELAP-approved quality assurance program and any applicable state or agency requirements. The test results meet requirements of the current NELAP/TNI standards or state or agency requirements, where applicable, except as noted in the laboratory case narrative provided. For a specific list of accredited analytes, refer to http://www.alsglobal.com/en/Our-Services/Life-Sciences/Environmental/Downloads/North-America-Downloads

ALS Group USA, Corp. dba ALS Environmental

Analytical Report

Client:	Frontier Technical Associates	**Service Request:**	R1306051
Project:	Plant C Landfill/ET-703	**Date Collected:**	8/16/13 0929
Sample Matrix:	Water	**Date Received:**	8/20/13
Sample Name:	OW-2	**Units:**	µg/L
Lab Code:	R1306051-001	**Basis:**	NA

Semivolatile Organic Compounds by GC/MS

Analytical Method: 8270D
Prep Method: EPA 3510C

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Analysis Lot	Note
2,4,5-Trichlorophenol	ND	U	9.4	1	8/23/13	8/27/13 18:04	190131	355876	
2,4,6-Trichlorophenol	ND	U	9.4	1	8/23/13	8/27/13 18:04	190131	355876	
2,4-Dichlorophenol	ND	U	9.4	1	8/23/13	8/27/13 18:04	190131	355876	
2,4-Dimethylphenol	ND	U	9.4	1	8/23/13	8/27/13 18:04	190131	355876	
2,4-Dinitrophenol	ND	U	47	1	8/23/13	8/27/13 18:04	190131	355876	
2-Chlorophenol	ND	U	9.4	1	8/23/13	8/27/13 18:04	190131	355876	
2-Methylphenol	ND	U	9.4	1	8/23/13	8/27/13 18:04	190131	355876	
2-Nitrophenol	ND	U	9.4	1	8/23/13	8/27/13 18:04	190131	355876	
3- and 4-Methylphenol Coelution	ND	U	9.4	1	8/23/13	8/27/13 18:04	190131	355876	
4,6-Dinitro-2-methylphenol	ND	U	47	1	8/23/13	8/27/13 18:04	190131	355876	
4-Chloro-3-methylphenol	ND	U	9.4	1	8/23/13	8/27/13 18:04	190131	355876	
4-Nitrophenol	ND	U	47	1	8/23/13	8/27/13 18:04	190131	355876	
Pentachlorophenol (PCP)	ND	U	47	1	8/23/13	8/27/13 18:04	190131	355876	
Phenol	ND	U	9.4	1	8/23/13	8/27/13 18:04	190131	355876	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Q
2,4,6-Tribromophenol	68	28-157	8/27/13 18:04	
2-Fluorophenol	39	10-105	8/27/13 18:04	
Phenol-d6	33	10-107	8/27/13 18:04	

ALS Group USA, Corp. dba ALS Environmental

Analytical Report

Client:	Frontier Technical Associates	**Service Request:**	R1306051
Project:	Plant C Landfill/ET-703	**Date Collected:**	8/16/13 0957
Sample Matrix:	Water	**Date Received:**	8/20/13
Sample Name:	OW-3	**Units:**	µg/L
Lab Code:	R1306051-002	**Basis:**	NA

Semivolatile Organic Compounds by GC/MS

Analytical Method: 8270D
Prep Method: EPA 3510C

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Analysis Lot	Note
2,4,5-Trichlorophenol	ND	U	9.4	1	8/23/13	8/27/13 18:41	190131	355876	
2,4,6-Trichlorophenol	ND	U	9.4	1	8/23/13	8/27/13 18:41	190131	355876	
2,4-Dichlorophenol	ND	U	9.4	1	8/23/13	8/27/13 18:41	190131	355876	
2,4-Dimethylphenol	ND	U	9.4	1	8/23/13	8/27/13 18:41	190131	355876	
2,4-Dinitrophenol	ND	U	47	1	8/23/13	8/27/13 18:41	190131	355876	
2-Chlorophenol	ND	U	9.4	1	8/23/13	8/27/13 18:41	190131	355876	
2-Methylphenol	ND	U	9.4	1	8/23/13	8/27/13 18:41	190131	355876	
2-Nitrophenol	ND	U	9.4	1	8/23/13	8/27/13 18:41	190131	355876	
3- and 4-Methylphenol Coelution	ND	U	9.4	1	8/23/13	8/27/13 18:41	190131	355876	
4,6-Dinitro-2-methylphenol	ND	U	47	1	8/23/13	8/27/13 18:41	190131	355876	
4-Chloro-3-methylphenol	ND	U	9.4	1	8/23/13	8/27/13 18:41	190131	355876	
4-Nitrophenol	ND	U	47	1	8/23/13	8/27/13 18:41	190131	355876	
Pentachlorophenol (PCP)	ND	U	47	1	8/23/13	8/27/13 18:41	190131	355876	
Phenol	ND	U	9.4	1	8/23/13	8/27/13 18:41	190131	355876	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Q
2,4,6-Tribromophenol	53	28-157	8/27/13 18:41	
2-Fluorophenol	30	10-105	8/27/13 18:41	
Phenol-d6	21	10-107	8/27/13 18:41	

ALS Group USA, Corp. dba ALS Environmental

Analytical Report

Client:	Frontier Technical Associates	**Service Request:**	R1306051
Project:	Plant C Landfill/ET-703	**Date Collected:**	8/16/13 1345
Sample Matrix:	Water	**Date Received:**	8/20/13
Sample Name:	OW-4	**Units:**	µg/L
Lab Code:	R1306051-003	**Basis:**	NA

Semivolatile Organic Compounds by GC/MS

Analytical Method: 8270D
Prep Method: EPA 3510C

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Analysis Lot	Note
2,4,5-Trichlorophenol	ND	U	20	1	8/23/13	8/27/13 19:17	190131	355876	
2,4,6-Trichlorophenol	ND	U	20	1	8/23/13	8/27/13 19:17	190131	355876	
2,4-Dichlorophenol	ND	U	20	1	8/23/13	8/27/13 19:17	190131	355876	
2,4-Dimethylphenol	ND	U	20	1	8/23/13	8/27/13 19:17	190131	355876	
2,4-Dinitrophenol	ND	U	100	1	8/23/13	8/27/13 19:17	190131	355876	
2-Chlorophenol	ND	U	20	1	8/23/13	8/27/13 19:17	190131	355876	
2-Methylphenol	ND	U	20	1	8/23/13	8/27/13 19:17	190131	355876	
2-Nitrophenol	ND	U	20	1	8/23/13	8/27/13 19:17	190131	355876	
3- and 4-Methylphenol Coelution	ND	U	20	1	8/23/13	8/27/13 19:17	190131	355876	
4,6-Dinitro-2-methylphenol	ND	U	100	1	8/23/13	8/27/13 19:17	190131	355876	
4-Chloro-3-methylphenol	ND	U	20	1	8/23/13	8/27/13 19:17	190131	355876	
4-Nitrophenol	ND	U	100	1	8/23/13	8/27/13 19:17	190131	355876	
Pentachlorophenol (PCP)	ND	U	100	1	8/23/13	8/27/13 19:17	190131	355876	
Phenol	ND	U	20	1	8/23/13	8/27/13 19:17	190131	355876	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Q
2,4,6-Tribromophenol	64	28-157	8/27/13 19:17	
2-Fluorophenol	39	10-105	8/27/13 19:17	
Phenol-d6	31	10-107	8/27/13 19:17	

ALS Group USA, Corp. dba ALS Environmental

Analytical Report

Client:	Frontier Technical Associates	**Service Request:**	R1306051
Project:	Plant C Landfill/ET-703	**Date Collected:**	8/16/13 1036
Sample Matrix:	Water	**Date Received:**	8/20/13
Sample Name:	OW-5	**Units:**	µg/L
Lab Code:	R1306051-004	**Basis:**	NA

Semivolatile Organic Compounds by GC/MS

Analytical Method: 8270D
Prep Method: EPA 3510C

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Analysis Lot	Note
2,4,5-Trichlorophenol	ND	U	9.4	1	8/23/13	8/27/13 19:55	190131	355876	
2,4,6-Trichlorophenol	ND	U	9.4	1	8/23/13	8/27/13 19:55	190131	355876	
2,4-Dichlorophenol	ND	U	9.4	1	8/23/13	8/27/13 19:55	190131	355876	
2,4-Dimethylphenol	ND	U	9.4	1	8/23/13	8/27/13 19:55	190131	355876	
2,4-Dinitrophenol	ND	U	47	1	8/23/13	8/27/13 19:55	190131	355876	
2-Chlorophenol	ND	U	9.4	1	8/23/13	8/27/13 19:55	190131	355876	
2-Methylphenol	ND	U	9.4	1	8/23/13	8/27/13 19:55	190131	355876	
2-Nitrophenol	ND	U	9.4	1	8/23/13	8/27/13 19:55	190131	355876	
3- and 4-Methylphenol Coelution	ND	U	9.4	1	8/23/13	8/27/13 19:55	190131	355876	
4,6-Dinitro-2-methylphenol	ND	U	47	1	8/23/13	8/27/13 19:55	190131	355876	
4-Chloro-3-methylphenol	ND	U	9.4	1	8/23/13	8/27/13 19:55	190131	355876	
4-Nitrophenol	ND	U	47	1	8/23/13	8/27/13 19:55	190131	355876	
Pentachlorophenol (PCP)	ND	U	47	1	8/23/13	8/27/13 19:55	190131	355876	
Phenol	ND	U	9.4	1	8/23/13	8/27/13 19:55	190131	355876	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Q
2,4,6-Tribromophenol	67	28-157	8/27/13 19:55	
2-Fluorophenol	49	10-105	8/27/13 19:55	
Phenol-d6	42	10-107	8/27/13 19:55	

ALS Group USA, Corp. dba ALS Environmental

Analytical Report

Client:	Frontier Technical Associates	**Service Request:**	R1306051
Project:	Plant C Landfill/ET-703	**Date Collected:**	8/16/13 1047
Sample Matrix:	Water	**Date Received:**	8/20/13
Sample Name:	MH-9	**Units:**	µg/L
Lab Code:	R1306051-005	**Basis:**	NA

Semivolatile Organic Compounds by GC/MS

Analytical Method: 8270D
Prep Method: EPA 3510C

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Analysis Lot	Note
2,4,5-Trichlorophenol	ND	U	9.4	1	8/23/13	8/27/13 20:32	190131	355876	
2,4,6-Trichlorophenol	ND	U	9.4	1	8/23/13	8/27/13 20:32	190131	355876	
2,4-Dichlorophenol	ND	U	9.4	1	8/23/13	8/27/13 20:32	190131	355876	
2,4-Dimethylphenol	ND	U	9.4	1	8/23/13	8/27/13 20:32	190131	355876	
2,4-Dinitrophenol	ND	U	47	1	8/23/13	8/27/13 20:32	190131	355876	
2-Chlorophenol	ND	U	9.4	1	8/23/13	8/27/13 20:32	190131	355876	
2-Methylphenol	ND	U	9.4	1	8/23/13	8/27/13 20:32	190131	355876	
2-Nitrophenol	ND	U	9.4	1	8/23/13	8/27/13 20:32	190131	355876	
3- and 4-Methylphenol Coelution	ND	U	9.4	1	8/23/13	8/27/13 20:32	190131	355876	
4,6-Dinitro-2-methylphenol	ND	U	47	1	8/23/13	8/27/13 20:32	190131	355876	
4-Chloro-3-methylphenol	ND	U	9.4	1	8/23/13	8/27/13 20:32	190131	355876	
4-Nitrophenol	ND	U	47	1	8/23/13	8/27/13 20:32	190131	355876	
Pentachlorophenol (PCP)	ND	U	47	1	8/23/13	8/27/13 20:32	190131	355876	
Phenol	ND	U	9.4	1	8/23/13	8/27/13 20:32	190131	355876	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Q
2,4,6-Tribromophenol	65	28-157	8/27/13 20:32	
2-Fluorophenol	49	10-105	8/27/13 20:32	
Phenol-d6	43	10-107	8/27/13 20:32	

ALS Group USA, Corp. dba ALS Environmental

Analytical Report

Client:	Frontier Technical Associates	**Service Request:**	R1306051
Project:	Plant C Landfill/ET-703	**Date Collected:**	8/16/13
Sample Matrix:	Water	**Date Received:**	8/20/13
Sample Name:	DUP	**Units:**	µg/L
Lab Code:	R1306051-006	**Basis:**	NA

Semivolatile Organic Compounds by GC/MS

Analytical Method: 8270D
Prep Method: EPA 3510C

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Analysis Lot	Note
2,4,5-Trichlorophenol	ND	U	20	1	8/23/13	8/27/13 21:09	190131	355876	
2,4,6-Trichlorophenol	ND	U	20	1	8/23/13	8/27/13 21:09	190131	355876	
2,4-Dichlorophenol	ND	U	20	1	8/23/13	8/27/13 21:09	190131	355876	
2,4-Dimethylphenol	ND	U	20	1	8/23/13	8/27/13 21:09	190131	355876	
2,4-Dinitrophenol	ND	U	100	1	8/23/13	8/27/13 21:09	190131	355876	
2-Chlorophenol	ND	U	20	1	8/23/13	8/27/13 21:09	190131	355876	
2-Methylphenol	ND	U	20	1	8/23/13	8/27/13 21:09	190131	355876	
2-Nitrophenol	ND	U	20	1	8/23/13	8/27/13 21:09	190131	355876	
3- and 4-Methylphenol Coelution	ND	U	20	1	8/23/13	8/27/13 21:09	190131	355876	
4,6-Dinitro-2-methylphenol	ND	U	100	1	8/23/13	8/27/13 21:09	190131	355876	
4-Chloro-3-methylphenol	ND	U	20	1	8/23/13	8/27/13 21:09	190131	355876	
4-Nitrophenol	ND	U	100	1	8/23/13	8/27/13 21:09	190131	355876	
Pentachlorophenol (PCP)	ND	U	100	1	8/23/13	8/27/13 21:09	190131	355876	
Phenol	ND	U	20	1	8/23/13	8/27/13 21:09	190131	355876	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Q
2,4,6-Tribromophenol	70	28-157	8/27/13 21:09	
2-Fluorophenol	47	10-105	8/27/13 21:09	
Phenol-d6	38	10-107	8/27/13 21:09	

ALS Group USA, Corp. dba ALS Environmental

Analytical Report

Client:	Frontier Technical Associates	**Service Request:**	R1306051
Project:	Plant C Landfill/ET-703	**Date Collected:**	NA
Sample Matrix:	Water	**Date Received:**	NA
Sample Name:	Method Blank	**Units:**	µg/L
Lab Code:	RQ1310026-01	**Basis:**	NA

Semivolatile Organic Compounds by GC/MS

Analytical Method: 8270D
Prep Method: EPA 3510C

Analyte Name	Result	Q	MRL	Dilution Factor	Date Extracted	Date Analyzed	Extraction Lot	Analysis Lot	Note
2,4,5-Trichlorophenol	ND	U	10	1	8/23/13	8/26/13 17:17	190131	355746	
2,4,6-Trichlorophenol	ND	U	10	1	8/23/13	8/26/13 17:17	190131	355746	
2,4-Dichlorophenol	ND	U	10	1	8/23/13	8/26/13 17:17	190131	355746	
2,4-Dimethylphenol	ND	U	10	1	8/23/13	8/26/13 17:17	190131	355746	
2,4-Dinitrophenol	ND	U	50	1	8/23/13	8/26/13 17:17	190131	355746	
2-Chlorophenol	ND	U	10	1	8/23/13	8/26/13 17:17	190131	355746	
2-Methylphenol	ND	U	10	1	8/23/13	8/26/13 17:17	190131	355746	
2-Nitrophenol	ND	U	10	1	8/23/13	8/26/13 17:17	190131	355746	
3- and 4-Methylphenol Coelution	ND	U	10	1	8/23/13	8/26/13 17:17	190131	355746	
4,6-Dinitro-2-methylphenol	ND	U	50	1	8/23/13	8/26/13 17:17	190131	355746	
4-Chloro-3-methylphenol	ND	U	10	1	8/23/13	8/26/13 17:17	190131	355746	
4-Nitrophenol	ND	U	50	1	8/23/13	8/26/13 17:17	190131	355746	
Pentachlorophenol (PCP)	ND	U	50	1	8/23/13	8/26/13 17:17	190131	355746	
Phenol	ND	U	10	1	8/23/13	8/26/13 17:17	190131	355746	

Surrogate Name	%Rec	Control Limits	Date Analyzed	Q
2,4,6-Tribromophenol	79	28-157	8/26/13 17:17	
2-Fluorophenol	47	10-105	8/26/13 17:17	
Phenol-d6	34	10-107	8/26/13 17:17	

ALS Group USA, Corp. dba ALS Environmental

QA/QC Report

Client: Frontier Technical Associates
Project: Plant C Landfill/ET-703
Sample Matrix: Water

Service Request: R1306051
Date Analyzed: 8/26/13

Lab Control Sample Summary
Semivolatile Organic Compounds by GC/MS

Analytical Method: 8270D
Prep Method: EPA 3510C

Units: µg/L
Basis: NA

Extraction Lot: 190131

Analyte Name	Lab Control Sample RQ1310026-02 Result	Spike Amount	% Rec	Duplicate Lab Control Sample RQ1310026-03 Result	Spike Amount	% Rec	% Rec Limits	RPD	RPD Limit
2,4,5-Trichlorophenol	90.9	100	91	89.8	100	90	62 - 117	1	30
2,4,6-Trichlorophenol	88.9	100	89	90.8	100	91	62 - 115	2	30
2,4-Dichlorophenol	84.6	100	85	82.0	100	82	62 - 109	4	30
2,4-Dimethylphenol	55.1	100	55	75.8	100	76	28 - 100	32 *	30
2,4-Dinitrophenol	92.5	100	92	91.1	100	91	40 - 156	1	30
2-Chlorophenol	80.7	100	81	78.6	100	79	42 - 112	2	30
2-Methylphenol	73.9	100	74	75.3	100	75	51 - 95	1	30
2-Nitrophenol	86.5	100	86	85.1	100	85	60 - 113	1	30
3- and 4-Methylphenol Coelution	139	200	69	140	200	70	49 - 89	1	30
4,6-Dinitro-2-methylphenol	97.5	100	98	97.2	100	97	65 - 141	1	30
4-Chloro-3-methylphenol	86.0	100	86	83.5	100	83	42 - 124	4	30
4-Nitrophenol	54.0	100	54	54.3	100	54	10 - 126	<1	30
Pentachlorophenol (PCP)	90.3	100	90	90.3	100	90	56 - 146	<1	30
Phenol	42.0	100	42	42.6	100	43	10 - 113	2	30

Results flagged with an asterisk (*) indicate values outside control criteria.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM 10025

ALS Environmental

1565 Jefferson Road, Building 300, Suite 360 • Rochester, NY 14623 | +1 585 288 5380 +1 585 288 8475 (fax) PAGE 1 OF 1

Project Name: PLANT-C LANDFILL	Project Number: ET-703
Project Manager: Kathy Wager	Report CC:
Company/Address: Frontier Technical Associates Inc. 8675 Main Street Williamsville, NY 14221	
Phone #: 716-634-2293	Email:
Sampler's Signature:	Sampler's Printed Name: Ron Blinston

ANALYSIS REQUESTED *(Include Method Number and Container Preservative)*

PRESERVATIVE: 8

Preservative Key
0. NONE
1. HCL
2. HNO_3
3. H_2SO_4
4. NaOH
5. Zn. Acetate
6. MeOH
7. $NaHSO_4$
8. Other Ice

CLIENT SAMPLE ID	FOR OFFICE USE ONLY LAB ID	SAMPLING DATE	SAMPLING TIME	MATRIX	NUMBER OF CONTAINERS	PHENOLS BY 8270	REMARKS/ ALTERNATE DESCRIPTION
OW-2		8/16/13	9:29	GW	1	X	
OW-3			9:57		1	X	
OW-4			1:45		1	X	
OW-5			10:36		1	X	
MW-9			10:47		1	X	
DUP		↓	—	↓	1	X	

SPECIAL INSTRUCTIONS/COMMENTS
Metals
(ALL PHENOL COMPOUNDS)
PHENOLS BY EPA 8270
BATCH QAQC

See QAPP ☐

STATE WHERE SAMPLES WERE COLLECTED: ~~See Deb Patton~~ NY

TURNAROUND REQUIREMENTS
____ RUSH (SURCHARGES APPLY)
____ 1 day ____ 2 day ____ 3 day
____ 4 day ____ 5 day
REQUESTED REPORT DATE: STD

REPORT REQUIREMENTS
____ I. Results Only
____ II. Results + QC Summaries (LCS, DUP, MS/MSD as required)
✓ III. Results + QC and Calibration Summaries
____ IV. Data Validation Report with Raw Data
Edata ____ Yes ____

INVOICE INFORMATION
PO #:
BILL TO: QUOTE 4548

R1306051 5
Frontier Technical Associates
Plant C Landfill

RELINQUISHED BY	RECEIVED BY	RELINQUISHED BY	RECEIVED BY	RELINQUISHED BY
Signature	Signature	Signature	Signature	Signature
Printed Name: Ron Blinston	Printed Name: Pat Bennett	Printed Name: Pat Bennett	Printed Name: Gary Lutz	Printed Name
Firm: FTA	Firm: ALS	Firm: ALS	Firm: ALS	Firm
Date/Time: 8-2013 1445	Date/Time: 8-26-13 1445	Date/Time: 8/26/13 1705	Date/Time: 8/26/13 1705	Date/Time

Distribution: White - Lab Copy; Yellow - Return to Originator

Cooler Receipt and Preservation Check Form

Project/Client Frontier Folder Number R13-1051

Cooler received on 8/20/13 by: AD COURIER: (ALS) UPS FEDEX VELOCITY CLIENT

1.	Were custody seals on outside of cooler?	YES	(NO)
2.	Were custody papers properly filled out (ink, signed, etc.)?	(YES)	NO
3.	Did all bottles arrive in good condition (unbroken)?	(YES)	NO
4.	Did VOA vials, Alkalinity, or Sulfide have significant* air bubbles?	YES NO	(N/A)
5.	Were **Ice** or **Ice packs** present?	(YES)	NO
6.	Where did the bottles originate?	(ALS/ROC), CLIENT	
7.	Soil VOA samples received as:	Bulk Jar Encore TerraCore Lab5035set	(N/A)
8.	Temperature of cooler(s) upon receipt:	3.0°	

Is the temperature within 0° - 6° C?: (Y) N Y N Y N Y N Y N

If No, Explain Below Date/Time Temperatures Taken: 8/20/13 1410

Thermometer ID: (IR GUN#3) / IR GUN#4 Reading From: Temp Blank (Sample Bottle)

If out of Temperature, note packing/ice condition & Client Approval to Run Samples:

All Samples held in storage location R-002 by AD on 8/20/13 at 1411

5035 samples placed in storage location _____ by _____ on _____ at _____

PC Secondary Review: N/A

Cooler Breakdown: Date: 8/20/13 Time: 1527 by: AD

1.	Were all bottle labels complete (*i.e.* analysis, preservation, etc.)?	(YES)	NO
2.	Did all bottle labels and tags agree with custody papers?	(YES)	NO
3.	Were correct containers used for the tests indicated?	(YES)	NO
4.	Air Samples: Cassettes / Tubes Intact Canisters Pressurized Tedlar® Bags Inflated		(N/A)

Explain any discrepancies:

pH	Reagent	YES	NO	Lot Received	Exp
≥12	NaOH				
≤2	HNO_3				
≤2	H_2SO_4				
<4	$NaHSO_4$				
Residual Chlorine (-)	For TCN Phenol and 522			If present, contact PM to add ascorbic acid Or sodium sulfite (522)	
	$Na_2S_2O_3$	-	-		
	Zn Aceta	-	-		
	HCl	*	*		

Sample ID	Vol. Added	Lot Added	Final pH

*Not to be tested before analysis – pH tested and recorded by VOAs or GenChem on a separate worksheet

Yes = All samples OK

No = Samples were preserved at lab as listed

PM OK to Adjust: _____

Bottle lot numbers: 09 1012-11CK

Other Comments:

PC Secondary Review: _____

*significant air bubbles: VOA > 5-6 mm : WC >1 in. diameter

New York State Department of Environmental Conservation
Division of Environmental Remediation, 11th Floor
625 Broadway, Albany, New York 12233
Phone: (518) 402-9553 **Fax:** (518) 402-9577
Website: www.dec.ny.gov

Joe Martens
Commissioner

3/17/2014

Mr. Douglas Wright
Saint Gobain Abrasives
P.O. Box 301
6600 Walmore Rd.
Niagara Falls, NY 14304

Re: Reminder Notice: Site Management Periodic Review Report and IC/EC Certification Submittal
Site Name: Carborundum-Abrasive Division
Site No.: 932007
Site Address: 6600 Walmore Road
Wheatfield, NY 14304

Dear Mr. Douglas Wright:

This letter serves as a reminder that sites in active Site Management (SM) require the submittal of a periodic progress report. This report, referred to as the Periodic Review Report (PRR), must document the implementation of, and compliance with, site specific SM requirements. Section 6.3(b) of DER-10 *Technical Guidance for Site Investigation and Remediation* (available online at http://www.dec.ny.gov/regulations/67386.html) provides guidance regarding the information that must be included in the PRR. Further, if the site is comprised of multiple parcels, then you as the Certifying Party must arrange to submit one PRR for all parcels that comprise the site. The PRR must be received by the Department no later than **April 30, 2014**. Guidance on the content of a PRR is enclosed.

Site Management is defined in regulation (6 NYCRR 375-1.2(at)) and in Chapter 6 of DER-10. Depending on when the remedial program for your site was completed, SM may be governed by multiple documents (e.g., Operation, Maintenance, and Monitoring Plan; Soil Management Plan) or one comprehensive Site Management Plan.

A Site Management Plan (SMP) may contain one or all of the following elements, as applicable to the site: a plan to maintain institutional controls and/or engineering controls ("IC/EC Plan"); a plan for monitoring the performance and effectiveness of the selected remedy ("Monitoring Plan"); and/or a plan for the operation and maintenance of the selected remedy ("O&M Plan"). Additionally, the technical requirements for SM are stated in the decision document (e.g., Record of Decision) and, in some cases, the legal agreement directing the remediation of the site (e.g., order on consent, voluntary agreement, etc.).

When you submit the PRR (by the due date above), include the enclosed forms documenting that all SM requirements are being met. The Institutional Controls (ICs) portion of the form (Box 6) must be signed by you or your designated representative. The Engineering Controls (ECs) portion of the form (Box 7) must be signed by a Qualified Environmental Professional (QEP). If you cannot certify that all SM requirements are being met, you must submit a Corrective Measures Work Plan that identifies the actions to be taken to restore compliance. The work plan must include a schedule to be approved by the Department. The Periodic Review process will not be considered complete until all necessary corrective measures are completed and all required controls are certified. Instructions for completing the certifications are enclosed.

All site-related documents and data, including the PRR, are to be submitted in electronic format to the Department of Environmental Conservation. The Department will not approve the PRR unless all documents and data generated in support of that report have been submitted in accordance with the electronic submissions protocol. In addition, the certification forms are required to be submitted in both paper and electronic formats.

Information on the format of the data submissions can be found at:
http://www.dec.ny.gov/regulations/2586.html

The signed certification forms should be sent to Brian Sadowski, Project Manager, at the following address:

New York State Department of Environmental Conservation
270 Michigan Ave
Buffalo, NY 14203-2915

Phone number: 716-851-7220. E-mail: bpsadows@gw.dec.state.ny.us

The contact information above is also provided so that you may notify the project manager about upcoming inspections, or for any other questions or concerns that may arise in regard to the site.

Enclosures

PRR General Guidance
Certification Form Instructions
Certification Forms

cc: w/ enclosures

Patriot Wheatfield Assoc, LP c/o P.Equit

ec: w/ enclosures
Brian Sadowski, Project Manager
Greg Sutton, Hazardous Waste Remediation Engineer, Region 9

Enclosure 1

Certification Instructions

I. Verification of Site Details (Box 1 and Box 2):

Answer the three questions in the Verification of Site Details Section. The Owner and/or Qualified Environmental Professional (QEP) may include handwritten changes and/or other supporting documentation, as necessary.

II. Certification of Institutional Controls/ Engineering Controls (IC/ECs)(Boxes 3, 4, and 5)

1.1.1. Review the listed IC/ECs, confirming that all existing controls are listed, and that all existing controls are still applicable. If there is a control that is no longer applicable the Owner / Remedial Party should petition the Department separately to request approval to remove the control.

2. In Box 5, complete certifications for all Plan components, as applicable, by checking the corresponding checkbox.

3. If you cannot certify "YES" for each Control listed in Box 3 & Box 4, sign and date the form in Box 5. Attach supporting documentation that explains why the **Certification** cannot be rendered, as well as a plan of proposed corrective measures, and an associated schedule for completing the corrective measures. Note that this **Certification** form must be submitted even if an IC or EC cannot be certified; however, the certification process will not be considered complete until corrective action is completed.

If the Department concurs with the explanation, the proposed corrective measures, and the proposed schedule, a letter authorizing the implementation of those corrective measures will be issued by the Department's Project Manager. Once the corrective measures are complete, a new Periodic Review Report (with IC/EC Certification) must be submitted within 45 days to the Department. If the Department has any questions or concerns regarding the PRR and/or completion of the IC/EC Certification, the Project Manager will contact you.

III. IC/EC Certification by Signature (Box 6 and Box 7)**:**

If you certified "YES" for each Control, please complete and sign the IC/EC Certifications page as follows:

- For the Institutional Controls on the use of the property, the certification statement in Box 6 shall be completed and may be made by the property owner or designated representative.

- For the Engineering Controls, the certification statement in Box 7 must be completed by a Professional Engineer or Qualified Environmental Professional, as noted on the form.

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. 932007

Site Name Carborundum-Abrasive Division

Site Address: 6600 Walmore Road Zip Code: 14304
City/Town: Wheatfield
County: Niagara
Site Acreage: 1.0

Reporting Period: March 01, 2013 to March 01, 2014

	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))?	☐	☒
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? Industrial	☒	☐
7. Are all ICs/ECs 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

SITE NO. 932007 Box 3

Description of Institutional Controls

Parcel	Owner	Institutional Control
146.00-1-9.2	Patriot Wheatfield Assoc, LP c/o P.Equit	Monitoring Plan O&M Plan

Clay landfill cap inspected quarterly with bi-ennial physical and chemical groundwater quality monitoring. Mowing performed annually in late summer after ground nesting birds have fledged.

Box 4

Description of Engineering Controls

Parcel	Engineering Control
146.00-1-9.2	Cover System

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
☒	☐

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. 932007

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 Tim Vitorino (print name) at 6600 Walmore Rd, Wheatfield, NY (print business address)

am certifying as Plant Manager (Owner or Remedial Party)

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

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

Date 4/24/14

IC/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 David Harty (print name) at Frontier Technical Associates, Inc. (print business address)

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

STATE OF NEW YORK
DAVID M. HARTY
No. 090810-1
LICENSED PROFESSIONAL ENGINEER

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

Stamp (Required for PE)

4/8/14
Date

Enclosure 3
Periodic Review Report (PRR) General Guidance

I. Executive Summary: (1/2-page or less)
   A. Provide a brief summary of site, nature and extent of contamination, and remedial history.
   B. Effectiveness of the Remedial Program - Provide overall conclusions regarding;
      1. progress made during the reporting period toward meeting the remedial objectives for the site
      2. the ultimate ability of the remedial program to achieve the remedial objectives for the site.
   C. Compliance
      1. Identify any areas of non-compliance regarding the major elements of the Site Management Plan (SMP, i.e., the Institutional/Engineering Control (IC/EC) Plan, the Monitoring Plan, and the Operation & Maintenance (O&M) Plan).
      2. Propose steps to be taken and a schedule to correct any areas of non-compliance.
   D. Recommendations
      1. recommend whether any changes to the SMP are needed
      2. recommend any changes to the frequency for submittal of PRRs (increase, decrease)
      3. recommend whether the requirements for discontinuing site management have been met.

II. Site Overview (one page or less)
   A. Describe the site location, boundaries (figure), significant features, surrounding area, and the nature and extent of contamination prior to site remediation.
   B. Describe the chronology of the main features of the remedial program for the site, the components of the selected remedy, cleanup goals, site closure criteria, and any significant changes to the selected remedy that have been made since remedy selection.

III. Evaluate Remedy Performance, Effectiveness, and Protectiveness
   Using tables, graphs, charts and bulleted text to the extent practicable, describe the effectiveness of the remedy in achieving the remedial goals for the site. Base findings, recommendations, and conclusions on objective data. Evaluations and should be presented simply and concisely.

IV. IC/EC Plan Compliance Report (if applicable)
   A. IC/EC Requirements and Compliance
      1. Describe each control, its objective, and how performance of the control is evaluated.
      2. Summarize the status of each goal (whether it is fully in place and its effectiveness).
      3. Corrective Measures: describe steps proposed to address any deficiencies in ICECs.
      4. Conclusions and recommendations for changes.
   B. IC/EC Certification
      1. The certification must be complete (even if there are IC/EC deficiencies), and certified by the appropriate party as set forth in a Department-approved certification form(s).

V. Monitoring Plan Compliance Report (if applicable)
   A. Components of the Monitoring Plan (tabular presentations preferred) - Describe the requirements of the monitoring plan by media (i.e., soil, groundwater, sediment, etc.) and by any remedial technologies being used at the site.
   B. Summary of Monitoring Completed During Reporting Period - Describe the monitoring tasks actually completed during this PRR reporting period. Tables and/or figures should be used to show all data.
   C. Comparisons with Remedial Objectives - Compare the results of all monitoring with the remedial objectives for the site. Include trend analyses where possible.
   D. Monitoring Deficiencies - Describe any ways in which monitoring did not fully comply with the monitoring plan.
   E. Conclusions and Recommendations for Changes - Provide overall conclusions regarding the monitoring completed and the resulting evaluations regarding remedial effectiveness.

VI. Operation & Maintenance (O&M) Plan Compliance Report (if applicable)
   A. Components of O&M Plan - Describe the requirements of the O&M plan including required activities, frequencies, recordkeeping, etc.
   B. Summary of O&M Completed During Reporting Period - Describe the O&M tasks actually completed during this PRR reporting period.
   C. Evaluation of Remedial Systems - Based upon the results of the O&M activities completed, evaluated the ability of each component of the remedy subject to O&M requirements to perform as

designed/expected.

D. O&M Deficiencies - Identify any deficiencies in complying with the O&M plan during this PRR reporting period.

E. Conclusions and Recommendations for Improvements - Provide an overall conclusion regarding O&M for the site and identify any suggested improvements requiring changes in the O&M Plan.

VII. Overall PRR Conclusions and Recommendations

A. Compliance with SMP - For each component of the SMP (i.e., IC/EC, monitoring, O&M), summarize;
   1. whether all requirements of each plan were met during the reporting period
   2. any requirements not met
   3. proposed plans and a schedule for coming into full compliance.

B. Performance and Effectiveness of the Remedy - Based upon your evaluation of the components of the SMP, form conclusions about the performance of each component and the ability of the remedy to achieve the remedial objectives for the site.

C. Future PRR Submittals
   1. Recommend, with supporting justification, whether the frequency of the submittal of PRRs should be changed (either increased or decreased).
   2. If the requirements for site closure have been achieved, contact the Departments Project Manager for the site to determine what, if any, additional documentation is needed to support a decision to discontinue site management.

VIII. Additional Guidance

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