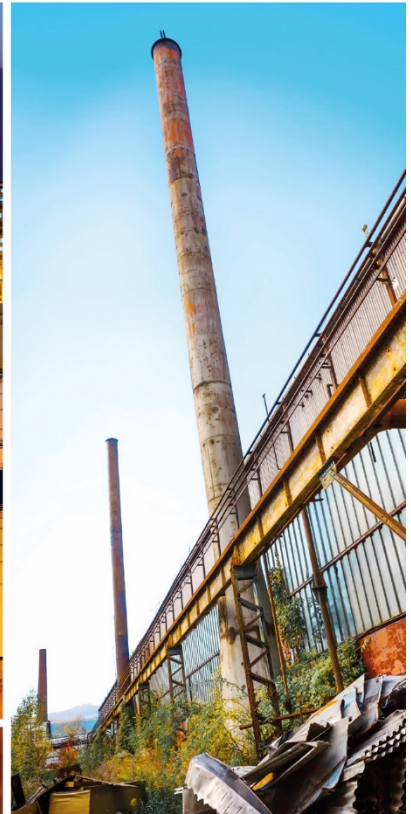
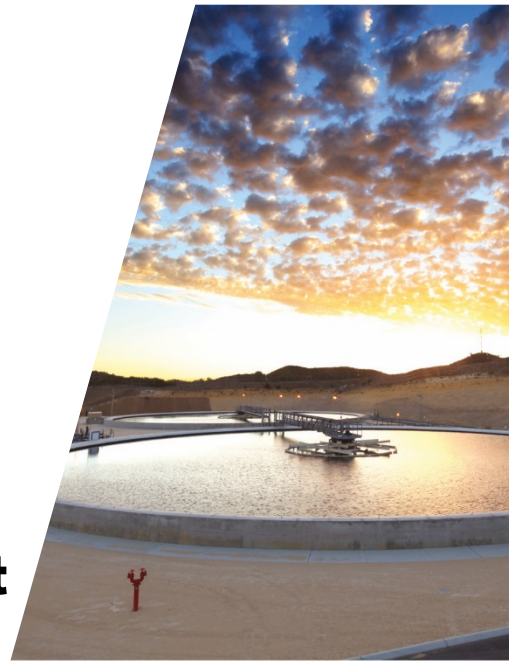




2019 Periodic Review Report

Durez Inlet
North Tonawanda, New York
NYSDEC Site No. 932018

Glenn Springs Holdings, Inc.





Executive Summary

Effective July 1, 1998, Site responsibilities for the former Occidental Chemical Corporation (OxyChem) Durez Inlet (Inlet) in North Tonawanda, New York were assigned by OxyChem to Glenn Springs Holdings, Inc. (GSH), an affiliate of OxyChem. Pursuant to Section 11.0 of the Approved Inlet Remedial Plan (AIRP), GSH is conducting a post-remediation monitoring program at the Inlet.

Hydraulic monitoring and chemical monitoring were conducted on a semiannual basis during this reporting period. The hydraulic monitoring data show that the overall direction of groundwater flow at the Site is from west to east, across the upland area of the Inlet toward the Little Niagara River (River).

No dense non-aqueous phase liquid (DNAPL) has been observed in the groundwater monitoring wells located outside the cutoff wall (North Lobe). The monitoring results indicate that the cutoff wall is functioning as designed.

The 2019 groundwater quality monitoring results are consistent with historical results. Analytical results for wells MW-16I, MW-18I, and MW-19I were below the New York State (NYS) water quality standards and guidance values for Class GA (potable) groundwater. Concentrations of Targeted Site Compounds (TSCs) were present in MW-20I (average 3,314 micrograms per liter [$\mu\text{g/L}$] in 2019 versus 3,250 $\mu\text{g/L}$ in 2018) and in MW-22I (average 2,305 $\mu\text{g/L}$ in 2019 versus 2,384 $\mu\text{g/L}$ in 2018). The concentrations observed in MW-20I have remained orders of magnitude lower than those observed prior to the implementation of the in situ chemical oxidation (ISCO) program implemented in 2011/2012, have since stabilized, and the general trend in the TSC concentrations has been downward since 1996. TSC concentrations in this well have remained relatively stable with only slight increases since 2012, which is likely due to the expected slight rebound following completion of the injections. Historic concentrations of TSCs in groundwater samples collected from monitoring well MW-22I have shown both increasing and decreasing trends historically, but have stabilized and have remained relatively consistent with only slight increases over the past 2 years. These concentrations remain lower than the pre-injection concentrations.

A passive diffusion remedial program was implemented at groundwater monitoring wells MW-16I, MW-20I, and MW-22I in the fourth quarter of 2019. The effect of the program on groundwater concentrations will not be known until 2020 and as such, will be evaluated in the 2020 PRR.

No DNAPL has been observed in any of the groundwater monitoring wells located outside the cutoff wall in the North Lobe area. The monitoring results indicate that the cutoff wall is functioning as designed.

The Inlet monitoring program data for the Site demonstrates that the remedial program continues to meet its design objectives.



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1. Introduction

Effective July 1, 1998, Site responsibilities for the former Occidental Chemical Corporation (OxyChem) Durez Inlet (Inlet) were assigned by OxyChem to Glenn Springs Holdings, Inc. (GSH), an affiliate of OxyChem. Since that time, pursuant to the individual Site documents and subsequent approved modifications, GSH has conducted routine monitoring and maintenance programs at the Site. Since October 1, 2008, GSH contracted GHD, formerly Conestoga-Rovers & Associates (CRA), to perform monitoring, maintenance, and reporting activities for the Site under the direct management of GSH.

Pursuant to Section 11.0 of the Approved Inlet Remedial Plan (AIRP), GSH is conducting a post-remediation monitoring program at the Inlet. The AIRP is Appendix A to the Third Stipulation and Partial Consent Judgment (Third PCJ) filed in United States District Court-Western District of New York by the State and OxyChem as part of the Durez Inlet Remediation Project. The monitoring program has been underway since May 1995, following completion of Site environmental restoration in April 1995.

The requirements of the post-remediation monitoring program are outlined in the New York State Department of Environmental Conservation (NYSDEC)-approved Inlet Monitoring Plan dated October 1995. The Inlet Monitoring Plan includes frequency revisions approved by the DEC in 2018. The Monitoring Plan was revised in April 2019.

A Site location plan is presented on Figure 1.1.

This Periodic Review Report (PRR) describes the monitoring and maintenance activities conducted and presents the data collected at the Inlet between January 1 and December 31, 2019. The completed NYSDEC Institutional Controls and Engineering Controls (ICEC) Certification Form is included as Appendix A. Other activities performed at the Site included those associated with sediment sampling completed in the Niagara River and Pettit Cove. As the sediment sampling activities completed in Pettit Cove and the Niagara River in 2019 were not relevant to the operation, maintenance, and monitoring OM&M) activities for the Durez Inlet Site, these activities were not included in this PRR. However, the results of the sampling activities are presented in "Pettit Creek Flume Sediment Monitoring Report" dated February 7, 2020. This report was approved by the NYSDEC on February 10, 2020. Unless relevant to OM&M activities for the Site, documentation associated with these other activities will continue to be provided to the NYSDEC under separate cover.

2. Inlet Monitoring Program

The activities associated with the Inlet monitoring program in accordance with Section 11.0 of the AIRP include:

- i) Measurement of the Little Niagara River (River) water level and groundwater levels
- ii) Chemical analysis of groundwater samples
- iii) Monitoring and operation of dense non-aqueous phase liquid (DNAPL) extraction wells



- iv) Maintenance of wells
- v) Inspection of Site physical characteristics
- vi) Evaluation of remediation performance
- vii) Submittal of summary reports to the NYSDEC

This annual report presents the results of hydraulic and chemical monitoring of groundwater, monitoring, and extraction of DNAPL, and inspection activities conducted at the Inlet for the calendar year 2019 in support of the AIRP.

2.1 Purpose

The Inlet Monitoring Plan consists of a DNAPL/groundwater monitoring program and a systematic inspection of the Inlet. The purpose of the Inlet Monitoring Plan is to verify the effectiveness of the remedy in the North Lobe, such as extraction of free or mobile DNAPL and isolation of the residuals by the cutoff and sheet pile walls. The North Lobe is defined as the area located inside of the cutoff wall to the north of the Inlet Cove (Figure 2.1). Five DNAPL extraction wells are located in the North Lobe. Groundwater monitoring wells are located within and outside of the North Lobe for the purposes of hydraulic and chemical groundwater monitoring. Specific objectives of the DNAPL/groundwater monitoring program for the North Lobe are as follows:

- i) To identify and remove, as necessary, DNAPL in the extraction well sumps
- ii) To characterize groundwater flow directions and hydraulic gradients in the vicinity of the North Lobe
- iii) To identify and document long-term changes in groundwater quality in the North Lobe area
- iv) To inspect groundwater collected from the lower alluvium monitoring wells outside of the North Lobe for the presence of DNAPL

Inspection of the Site includes observations for evidence of erosion and disturbance to remedial structures.

2.2 Scope

2.2.1 Groundwater Quality Monitoring Program

The groundwater quality monitoring program (chemical monitoring) consists of collecting and analyzing groundwater samples from five of the seven lower alluvium monitoring wells designated as "intermediate" wells, consisting of one well hydraulically upgradient to the North Lobe (MW-16I) and four wells hydraulically downgradient or cross-gradient to the North Lobe (MW-18I, MW-19I, MW-20I, and MW-22I). The groundwater samples are analyzed for the Targeted Site Compounds (TSCs), consisting of benzene; toluene; chlorobenzene; 1,2-, 1,3-, and 1,4-dichlorobenzene; and 1,2,3- and 1,2,4-trichlorobenzene (Table 2.1). The groundwater samples are also inspected for the presence of DNAPL. The monitoring well locations are shown on Figure 2.1.



2.2.2 Hydraulic Monitoring Program

The hydraulic monitoring program consists of measuring groundwater elevations in seven intermediate monitoring wells (MW-15I, MW-16I, MW-17I, MW-18I, MW-19I, MW-20I, and MW-22I) installed in the lower alluvium outside the cutoff wall, and one monitoring well (MW-21S) installed in the upper alluvium and fill inside the cutoff wall and designated as a "shallow" well. Groundwater elevations and DNAPL levels are also measured in five extraction wells (EW-1, EW-2, EW-3, EW-4, and EW-5) installed in the lower alluvium inside the cutoff wall in the isolated area where DNAPL has been detected. The River elevation is recorded utilizing a staff gauge (SG) located along the River's edge and is measured before and after groundwater levels are measured. The monitoring and extraction well locations and the SG location are presented on Figure 2.1.

DNAPL extraction only occurs during the boating off-season from October 15 to April 15. During this period, DNAPL is removed from an extraction well when the level of DNAPL in that well reaches the top of the extraction well sump. During the boating season when DNAPL extraction does not occur, any accumulated DNAPL remains within the containment wall of the North Lobe area. The top of the containment wall is at an elevation of approximately 562 feet above mean sea level (AMSL), while the top of sump elevations range from 538.10 to 539.20 feet AMSL (approximately 24 feet below the top of the containment wall).

3. Inlet Monitoring Program Results

3.1 Groundwater Quality Monitoring

Sampling, analytical protocols, and detection limits for the sampling program have been established and set forth in the original Partial Consent Judgment (PCJ) Appendix B-1, which is also included as Appendix B to the Inlet Monitoring Plan. The Inlet Monitoring Plan also includes sampling and field procedures that supplement those in the PCJ. The five intermediate groundwater monitoring wells (MW-16I, MW-18I, MW-19I, MW-20I, and MW-22I) were sampled semiannually from January through December during 2019. The frequency of groundwater sampling was revised from quarterly to semiannually and was approved by the NYSDEC in a letter dated May 30, 2018. All sampling was conducted in accordance with the procedures described in Appendix B of the Inlet Monitoring Plan.

ALS Environmental (ALS) in Rochester, New York, a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP)-certified laboratory, conducted the sample analyses. The analytical results are summarized in Table 2.1. The Quality Assurance/Quality Control (QA/QC) reviews for the two semiannual sampling events were submitted with the 2019 semiannual reports.

3.1.1 Chemical Concentrations

Groundwater quality generally remained stable during the 25th year of monitoring. The analytical results for the sampling events conducted in 2019 from three of the five monitoring wells (MW-16I, MW-18I, and MW-19I) were below the New York State (NYS) water quality standards and guidance values for Class GA (potable) groundwater (NYS groundwater standards). The NYS groundwater standards are set forth in the Division of Water Technical and Operational Guidance Series (1.1.1), Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations



(June 1998). The 2019 analytical results are summarized in Table 2.1. Historical groundwater results are provided in Appendix B.

An active in situ chemical oxidation (ISCO) program was conducted from April 2011 through April 2012 with injections occurring in April 2011, November 2011, and April 2012. This program has reduced and stabilized groundwater concentrations of TSCs at MW-20I and MW-22I. The ISCO program was summarized in the previously submitted "In Situ Chemical Oxidation Report - MW-20 and MW-22I - Durez Inlet Remediation Program" (CRA, 2013).

A passive diffusion remedial program was implemented at groundwater monitoring wells MW-16I, MW-20I, and MW-22I in the fourth quarter of 2019. Details of the program are presented in Section 3.1.3. The effect of the program on groundwater concentrations will not be known until 2020 and as such, will be evaluated in the 2020 PRR.

The groundwater quality in each of the five intermediate groundwater monitoring wells is discussed below.

MW-16I

The concentrations of the TSCs in samples collected from monitoring well MW-16I, which is considered to be an upgradient well for the Site, demonstrated a general downward trend from the time monitoring began in July 1995 until June 2006 (Figure 2.2 and Appendix B). Starting in June 2006, concentrations at this monitoring well began to fluctuate, gradually demonstrating a general increasing trend. The reason for this increasing trend is not known. The total concentration of TSCs has ranged from a high of 17.63 micrograms per liter ($\mu\text{g/L}$) in June 2006 to a low of non-detect (ND) at 1.0 $\mu\text{g/L}$ at various times between July 1995 and February 2009. Prior to June 2006, the highest concentration of TSCs was observed in April 1996 at a concentration of 5.4 $\mu\text{g/L}$.

Total concentrations of TSCs at monitoring well MW-16I in 2019 ranged between 2.28 $\mu\text{g/L}$ and 2.79 $\mu\text{g/L}$, which is slightly higher than the TSC concentrations in 2018 (2.23 $\mu\text{g/L}$ to 2.7 $\mu\text{g/L}$). The highest total TSC concentration was observed in the sample for the April 2019 sampling event at 2.79 $\mu\text{g/L}$. Total TSC concentrations remained approximately the same during the October 2019 monitoring events (2.40/2.28 $\mu\text{g/L}$).

With the exceptions of chlorobenzene during both the 2019 events, the individual TSCs in MW-16I were either not detected or were detected at estimated concentrations below the reporting limits of 1.0 $\mu\text{g/L}$. No TSC concentration exceeded the NYS groundwater standards in 2019.

MW-18I

With the exception of the total concentrations of TSCs in August 2007 (estimated at 0.18 $\mu\text{g/L}$), March 2008 (estimated at 0.17 $\mu\text{g/L}$), and February 2013 (estimated at 0.20 $\mu\text{g/L}$), the total concentration of TSCs in samples collected from monitoring well MW-18I has been ND since July 1999 (Figure 2.3 and Appendix B). The total concentration of TSCs has ranged from a high of 8.5 $\mu\text{g/L}$ in January 1996 to a low of ND at 1.0 $\mu\text{g/L}$ at various times between July 1995 and the



present. The concentrations of individual TSCs during the 2019 annual reporting period were all ND at 1.0 µg/L.

MW-19I

The total concentration of TSCs in samples collected from monitoring well MW-19I has shown a general downward trend since monitoring began in July 1995. With the exception of the total concentrations of TSCs of 2.5 µg/L in December 2006 and 0.34 µg/L in March 2008, the total concentration of TSCs in MW-19I has been ND since July 2002 (Figure 2.4 and Appendix B). The total concentration of TSCs has ranged from a high of 39.4 µg/L in July 1995 to a low of ND at 1.0 µg/L at various times between July 1995 and the present. Individual concentrations of TSCs at this location have not exceeded NYS groundwater standards since July 1999. Individual concentrations of TSCs during the 2019 annual reporting period were ND at 1.0 µg/L.

MW-20I

The total concentration of TSCs in samples collected from well MW-20I has fluctuated during the years of Site monitoring; however, overall, the trend has been generally downward since 1996 (Figure 2.5 and Appendix B). The total concentration of TSCs has ranged from a high of 99,100 µg/L in October 1997 to a low of 12.37 µg/L in December 2005. Fluctuating concentrations were observed from 1995 through the beginning of 2008. In 2008 and 2009, the total concentrations of TSCs were consistently above 10,000 µg/L, with very little fluctuation. Following the first ISCO injection event in April 2011, the total concentration of TSCs decreased to below 3,200 µg/L during the May 2011 sampling event. Upon completion of the final ISCO injection event in April 2012, the total concentration of TSCs decreased to below 2,200 µg/L during the May 2012 sampling event. From April 2012 to October 2019, the total concentration of TSCs has trended upwards, likely due to rebound effects but appears to have stabilized at an approximate average concentration around 3,300 µg/L.

The average total concentration of TSCs during the 2019 annual reporting period was 3,314 µg/L, compared to 3,250 µg/L for the 2018 annual reporting period. The total concentrations of TSCs for 2018 and 2019, by sampling period, are compared in the table below.

MW-20I	Total Concentrations of TSCs (µg/L)	
Period	2018	2019
1st Quarter	3,458	3,254 (semiannual event)
2nd Quarter	2,995	
3rd Quarter	3,297 (semiannual event)	3,374 (semiannual event)
4th Quarter		

The post-injection concentrations observed in MW-20I have remained orders of magnitude lower than those observed prior to the implementation of the ISCO program and have since stabilized.

MW-22I

The total concentration of TSCs in samples collected from well MW-22I has fluctuated during the years of Site monitoring; however, overall, the trend had been generally downward until 2005 (Figure 2.6 and Appendix B). Beginning in 2005, the concentrations at this location began to show an increasing trend. Since concentrations began increasing in 2005, the concentrations have



fluctuated. The total concentration of TSCs has ranged from a high of 4,850 µg/L in July 2001 to a low of 0.8 µg/L in December 2006. The average total concentration of TSCs in well MW-22I during the 2019 annual reporting period was 2,305 µg/L versus 2,384 µg/L in 2018. The concentrations of individual TSCs in this well between 2018 and 2019 have remained relatively consistent.

Although the ISCO program targeted the areas around MW-20I and MW-22I, the concentrations of TSCs in MW-22I have been consistently lower than in MW-20I by comparison. Total concentrations of TSCs in this well were reduced after the 2011 and 2012 ISCO events to below 1,000 µg/L; however, rebound was observed following the injection events. The increase in concentrations since the ISCO events is indicative of rebound within clayey soils after three injections of activated sodium persulfate. The concentrations of TSCs observed in well MW-22I are showing signs of balance with the adjacent MW-20I, as presented in the following tables depicting 2018 and 2019 data for the two wells.

Well Location	2018 Total Concentrations of TSCs (µg/L)		
	1st Quarter	2nd Quarter	Second Semiannual Period
MW-20I	3,458	2,995	3,297
MW-22I	2,495	2,122	2,534

Well Location	2019 Total Concentrations of TSCs (µg/L)	
	First Semiannual Period	Second Semiannual Period
MW-20I	3,254	3,374
MW-22I	2,084/2,189	2,421

The clayey (tight) soils, the sheet pile wall installed cross-gradient to groundwater flow, the adjacent River, and a clay aquitard surrounding the MW-20I and MW-22I well cluster do not allow significant groundwater flow through this area of the Site. These factors, combined with the ISCO injections, help to explain the fluctuating concentrations observed at well MW-22I in the years subsequent to the injections. No DNAPL has been observed in MW-22I during any of the monitoring events.

Figure 2.6 and the above tables show that the concentrations of TSCs in MW-22I remain lower than the pre-injection concentrations and have stabilized.

3.1.2 Chemical Trends

Graphs of the total concentrations of TSCs in monitoring wells MW-16I, MW-18I, MW-19I, MW-20I, and MW-22I since completion of Site remedy (April 1995) through the end of the year 2019 are presented on Figures 2.2 through 2.6. The historical and current analytical data for these wells are presented in Appendix B. Review of the graphs and data show:

- i) While occasional detections of low concentrations of the TSCs have occurred in the upgradient monitoring well MW-16I, the concentrations of the TSCs in this well have been lower than the NYS groundwater standards since July 1996, with the exception of a chlorobenzene concentration during the June 2006 sampling event (16 µg/L) and benzene concentrations during the August 2009, November 2013, May and November 2014, May 2015, February 2016 and February 2017, and February 2018 sampling events. These benzene concentrations exceeding the NYS groundwater standards of 1.0 µg/L have ranged



from 1.1 to 1.3 µg/L. No TSC concentration exceeded the NYS groundwater standards in 2019.

- ii) Individual concentrations of TSCs detected in groundwater samples collected from monitoring wells MW-18I and MW-19I since October 1999 have been lower than the NYS groundwater standards.
- iii) Although there is variability in the concentrations of TSCs in monitoring well MW-20I between groundwater monitoring events, concentrations have stabilized, with slight increases in concentrations since 2012. This is likely due to rebound following completion of the injections.
- iv) The concentrations of TSCs in groundwater samples collected from monitoring well MW-22I have shown both increasing and decreasing trends historically, but have stabilized and have remained relatively consistent over the past 2 years.

3.1.3 Passive Diffusion Remediation at MW-16I, MW-20I, and MW-22I

In response to requests from the NYSDEC expressed in letters dated May 30, 2018 and July 11, 2019, GSH evaluated the feasibility of implementing passive diffusion remedial technologies at groundwater monitoring wells MW-16I, MW-20I, and MW-22I. The purpose of the passive diffusion remedial effort is to decrease the concentrations of TSCs in these three wells over time. A work plan dated July 26, 2019 and revised on August 6, 2019 was approved by the NYSDEC in an email dated August 12, 2019. The work plan provided for the installation of Oxygen Release Compound (ORC) socks into wells MW-16I, MW-20I, and MW-22I for a period of 3 years.

The first round of ORC socks were installed into the wells on October 21, 2019. Replacement socks were installed on December 23, 2019 and February 24, 2020. Results from this first round of ORC socks will not be available until the next semiannual sampling event in April 2020. At that point, the ORC socks will have been in the wells for 6 months. The socks will be removed from the wells so that the effects of the ORC at the well screens can abate before sampling. The wells will remain sock-free for approximately 1 month before the April 2020 semiannual sampling event.

3.2 Hydraulic Monitoring

Groundwater elevations were measured semiannually in the DNAPL extraction wells and the groundwater monitoring wells from January through December 2019. The frequency of hydraulic monitoring was revised from monthly to semiannually and was approved by the NYSDEC in a letter dated May 30, 2018.

During a hydraulic monitoring event, the elevation of the River is also measured for comparison to the groundwater elevations. A summary of the 2019 water elevations for the eight monitoring wells, five extraction wells, and the River is presented in Table 2.2.

Groundwater potentiometric surface maps for the Site have been prepared based semiannual groundwater elevations and are presented on Figures 2.7 and 2.8.

A review of the hydraulic data measured during the 24 years of monitoring shows a correlation of the lower alluvium groundwater elevations (as measured in Inlet Site monitoring wells) with the elevation of the River. The potentiometric contours presented on Figures 2.7 and 2.8 show that groundwater flow is generally in an east-to-west direction across the upland area of the Site toward the River.



However, hydraulic gradients have been observed from the River into the North Lobe. Hydraulic gradients that fluctuate temporally are not uncommon near the groundwater-surface water interface. However, based on a comparison of the groundwater elevations in the wells farthest from the River (MW-15I through MW-18I) to wells closest to the River's shoreline, over the course of the monitoring period, the overall direction of groundwater flow at the Site is still east to west.

During a December 12, 2019 conference call the NYSDEC expressed concerns regarding a low point in the groundwater potentiometric surface as evident at EW-3 during the 2019 monitoring period. This low point does not actually exist. It is an artifact of the very small contour interval used in the contouring. All EWs are within 0.1 feet of each other. Therefore, assessment of the vertical groundwater flow within/outside the cutoff wall is not required at this time.

3.2.1 Dense Non-Aqueous Phase Liquid

DNAPL levels were measured in the five extraction wells (EW-1, EW-2, EW-3, EW-4, and EW-5) on a monthly basis from January to April 2019 and then on a semiannual basis from May to December 2019. The frequency of DNAPL measurement was revised from monthly to semiannually as approved by the NYSDEC on April 4, 2019. Table 2.3 summarizes the DNAPL elevations.

DNAPL removal from the five extraction wells is restricted to October 15 to April 15, during the boating off-season. DNAPL is removed only if its level rises above the sump in the bottom of the extraction well. The accumulation rate of DNAPL in the extraction wells has slowed over time. Table 2.4 shows the volume of DNAPL recovered from the Site. A total of 1,135.1 gallons of DNAPL has been recovered from the Site since remediation began in August 1993.

Approximately 1.8 gallons of DNAPL were removed from the extraction wells in 2019. Table 2.4 shows the volume of DNAPL recovered from the Site since the onset of maintenance and monitoring activities in May 1995. Since 2002, only 19.2 gallons of DNAPL have been recovered. The highest annual amount of DNAPL recovered since 2002 was 5.3 gallons in 2010. No DNAPL was removed from the extraction wells from 2002 through 2008 or from 2015 through 2018.

3.2.2 Site Inspections

Site and physical well inspections were completed semiannually with the results reported as a component of the semiannual groundwater monitoring reports. The completed field inspection forms were included in these reports and are also included in this PRR as Appendix C.

Evidence of 6-inch boreholes having been completed immediately adjacent to MW-16I and approximately 25 feet northeast of MW-16I was observed during the April 2019 Site inspection. The boreholes had been patched and filled at the ground surface with stone. Also observed was a large amount of fill material on the south slope leading down to the cove. The fill material appeared to primarily consist of clay-type soil and a small amount of concrete, with no staining or odors observed. Photographs of the apparent boreholes and fill material were emailed to the NYSDEC on August 12, 2019. The NYSDEC responded that it had visited the Site on August 2, 2019 and that its observations of the apparent boreholes and fill material were consistent with that described by GSH. The Site owner indicated that he had no knowledge of the fill material or apparent boreholes. No damage was observed at MW-16I during the April or October 2019 Site inspection. No repairs are required at this time.



4. Summary of 25th-Year Operation

The remedial systems at the Site are functioning as designed to contain the DNAPL, which allows for DNAPL removal and off-Site disposal as necessary.

Overall, groundwater quality to the north and east outside the cutoff wall has stabilized, in part due to the 2011 and 2012 ISCO injection events, which included injections of aqueous sodium persulfate and sodium hydroxide (April 2011, November 2011, and April 2012). Groundwater quality improved after the injections, as shown by the concentration of TSCs measured during monitoring conducted over the past 25 years. The concentrations observed in MW-20I have remained orders of magnitude lower than those observed prior to the implementation of the ISCO program in 2011/2012 and have since stabilized, with only slight increases since 2012 due to rebound. The pre-injection concentrations observed in MW-22I were significantly lower than those observed in nearby well MW-20I. The concentrations of TSCs in MW-22I between 2018 and 2019 have remained relatively consistent. These concentrations remain lower than the pre-injection concentrations and have stabilized.

The 2019 semiannual groundwater quality data for MW-16I, MW-18I, and MW-19I are consistent with historical analytical data. Analytical results for wells MW-16I, MW-18I, and MW-19I were below the NYS groundwater standards.

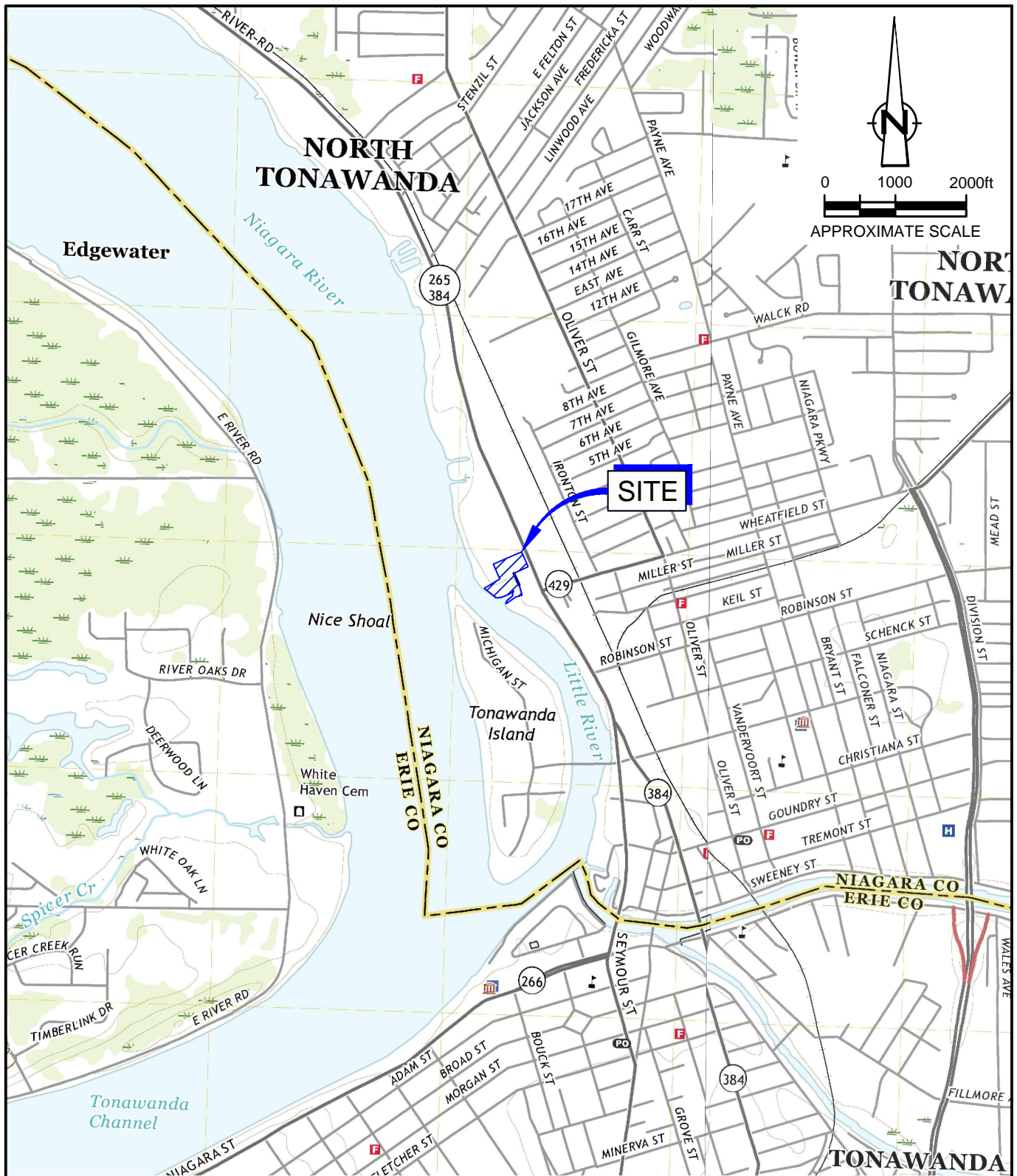
A passive diffusion remedial program was implemented at groundwater monitoring wells MW-16I, MW-20I, and MW-22I in the fourth quarter of 2019. The effect of the program on groundwater concentrations will not be known until 2020 and as such, will be evaluated in the 2020 PRR.

The hydraulic monitoring data show that the overall direction of groundwater flow at the Site is from west to east, across the upland area of the Inlet toward the River.

No DNAPL has been observed in any of the groundwater monitoring wells located outside the cutoff wall in the North Lobe area. The monitoring results indicate that the cutoff wall is functioning as designed.

The long-term changes in groundwater quality will continue to be monitored and evaluated.

The Inlet monitoring program data for the Site demonstrates that the remedial program continues to meet its design objectives.

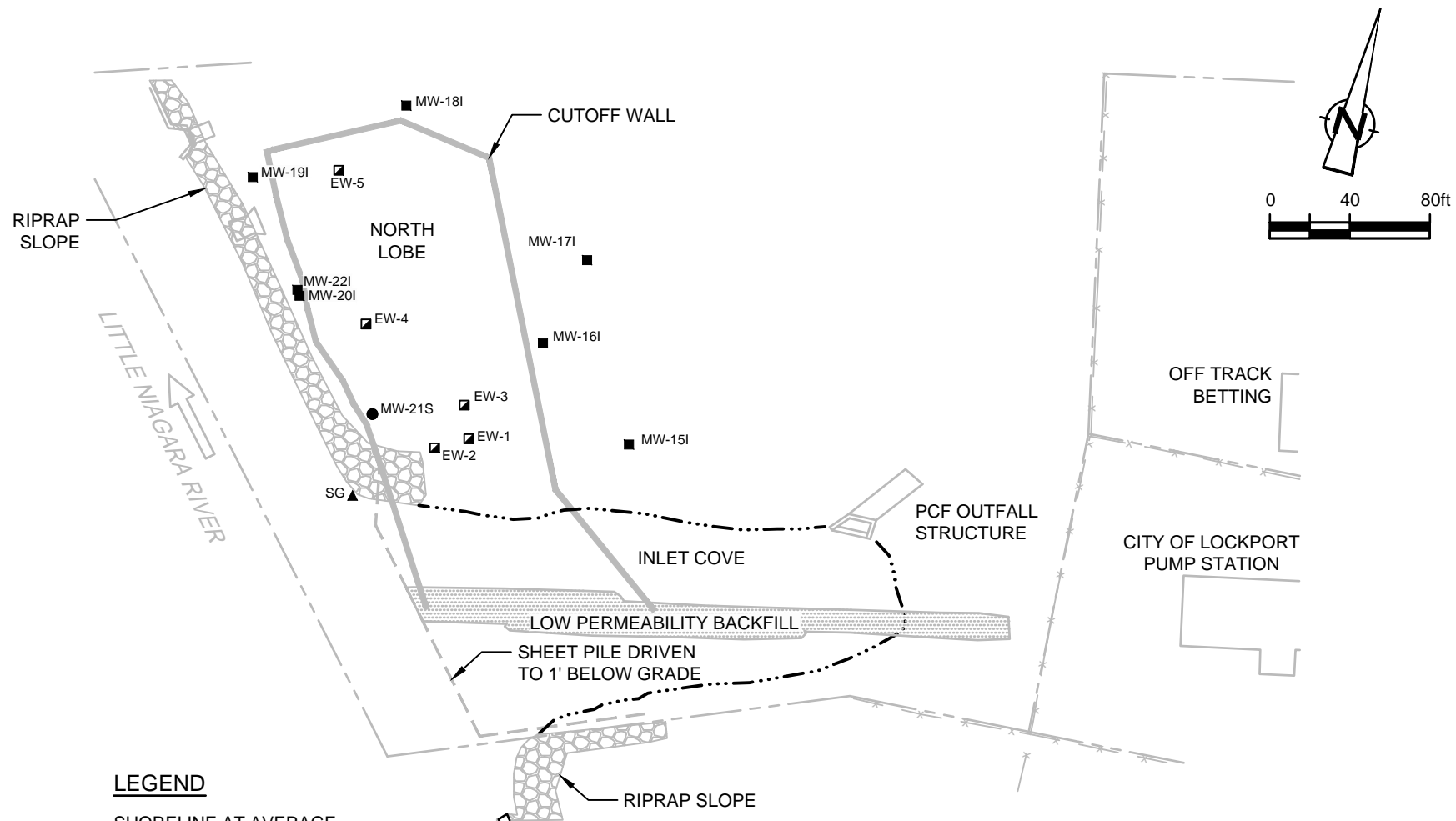


SOURCES:

- USGS QUADRANGLE MAP; TONAWANDA WEST, NY, 2019.
- USGS QUADRANGLE MAP; TONAWANDA EAST, NY, 2019.



figure 1.1
SITE LOCATION
DUREZ INLET SITE
GLENN SPRINGS HOLDINGS, INC.
North Tonawanda, New York



LEGEND

- ··· — SHORELINE AT AVERAGE WATER LEVEL 565.6' AMSL
- MW-21S ● SHALLOW MONITORING WELL
- MW-15I ■ INTERMEDIATE MONITORING WELL
- EW-1 ■ DNAPL EXTRACTION WELL
- SG ▲ STAFF GAGE



figure 2.1
 SITE PLAN
 DUREZ INLET SITE
 GLENN SPRINGS HOLDINGS, INC.
 North Tonawanda, New York

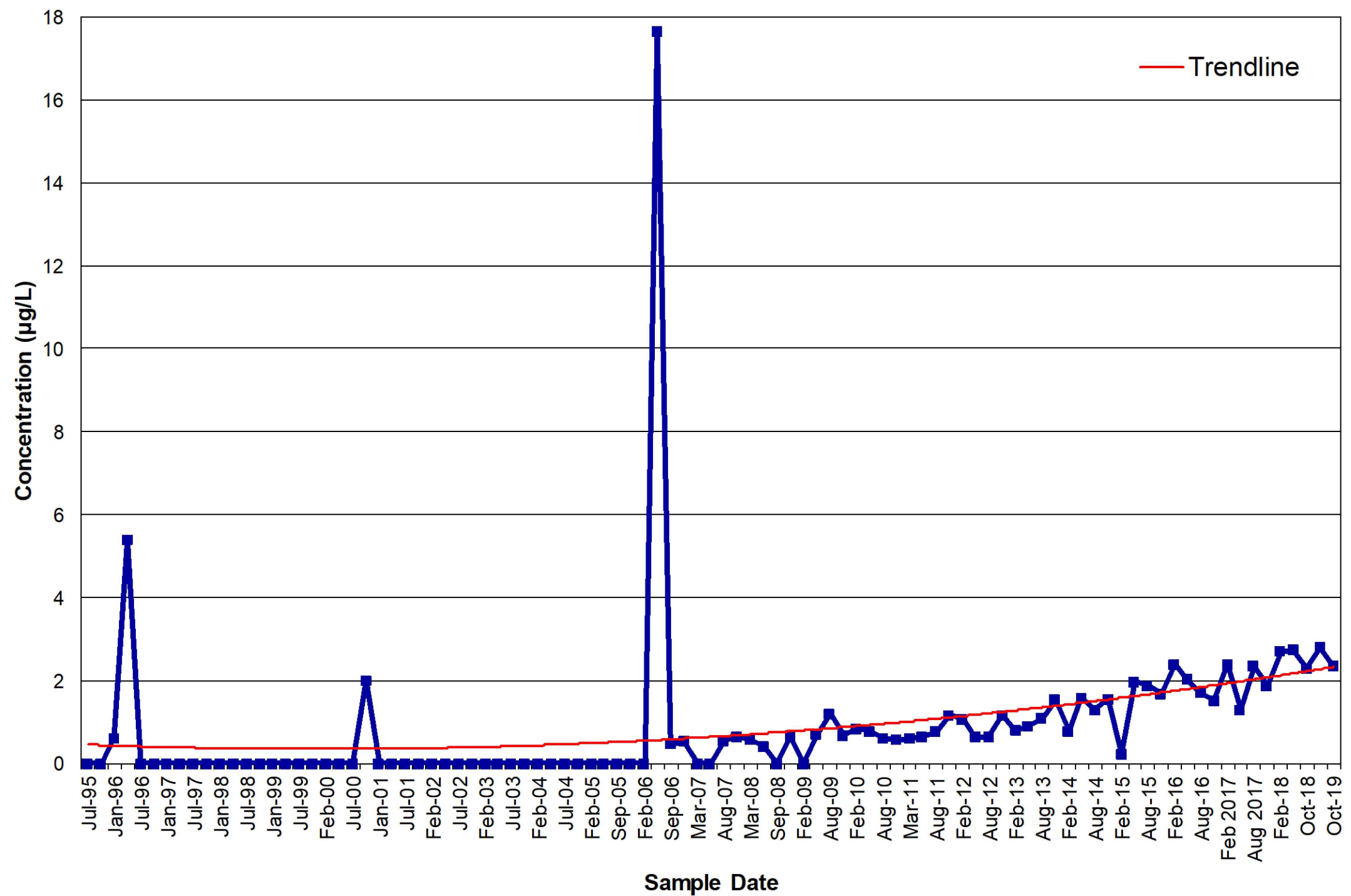


figure 2.2
 HISTORICAL CONCENTRATIONS OF TOTAL TARGETED SITE COMPOUNDS
 MW-16I
 DUREZ INLET SITE
 GLENN SPRINGS HOLDINGS, INC.
 North Tonawanda, New York



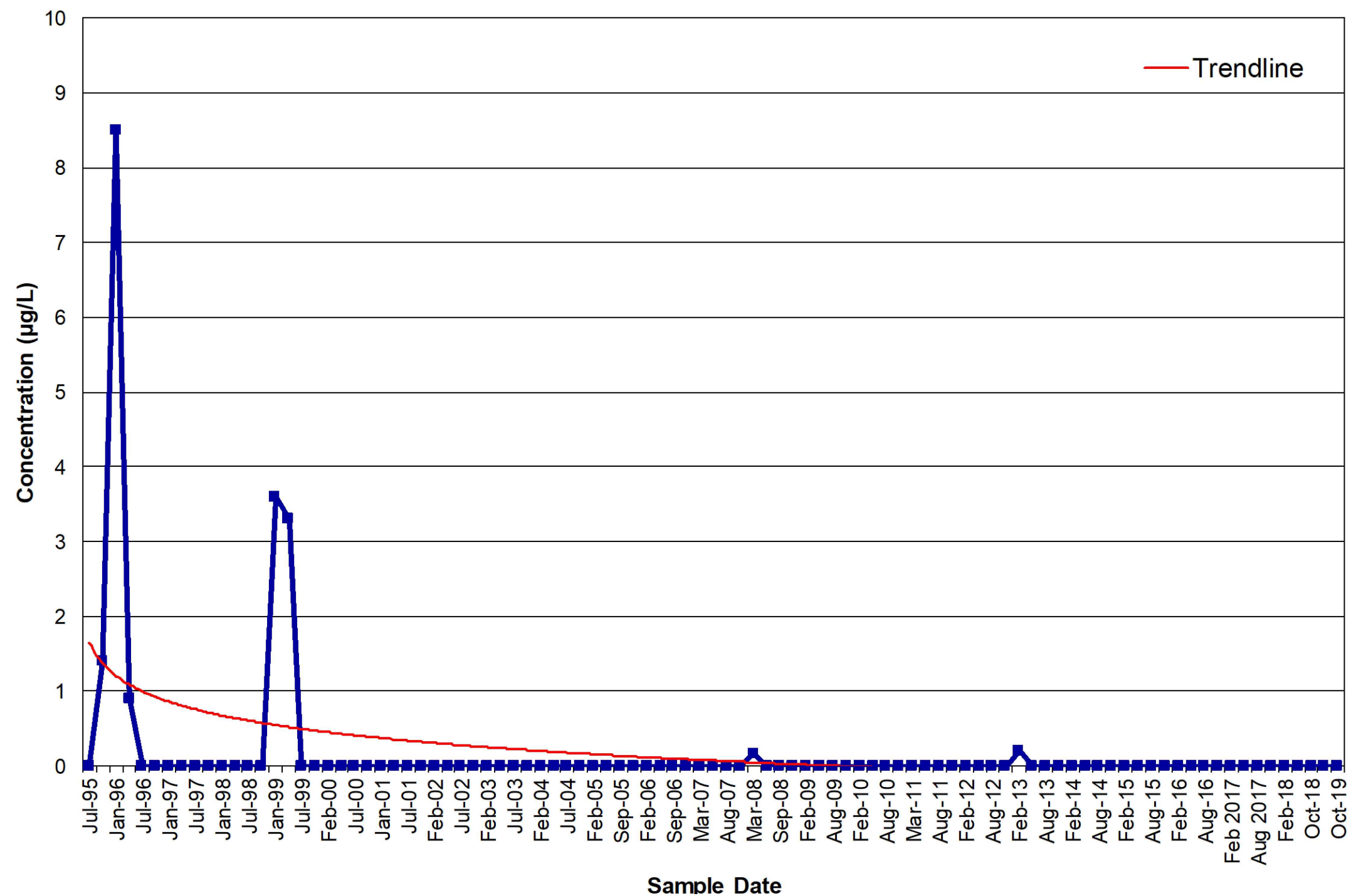


figure 2.3

HISTORICAL CONCENTRATIONS OF TOTAL TARGETED SITE COMPOUNDS

MW-18I

DUREZ INLET SITE

GLENN SPRINGS HOLDINGS, INC.

North Tonawanda, New York



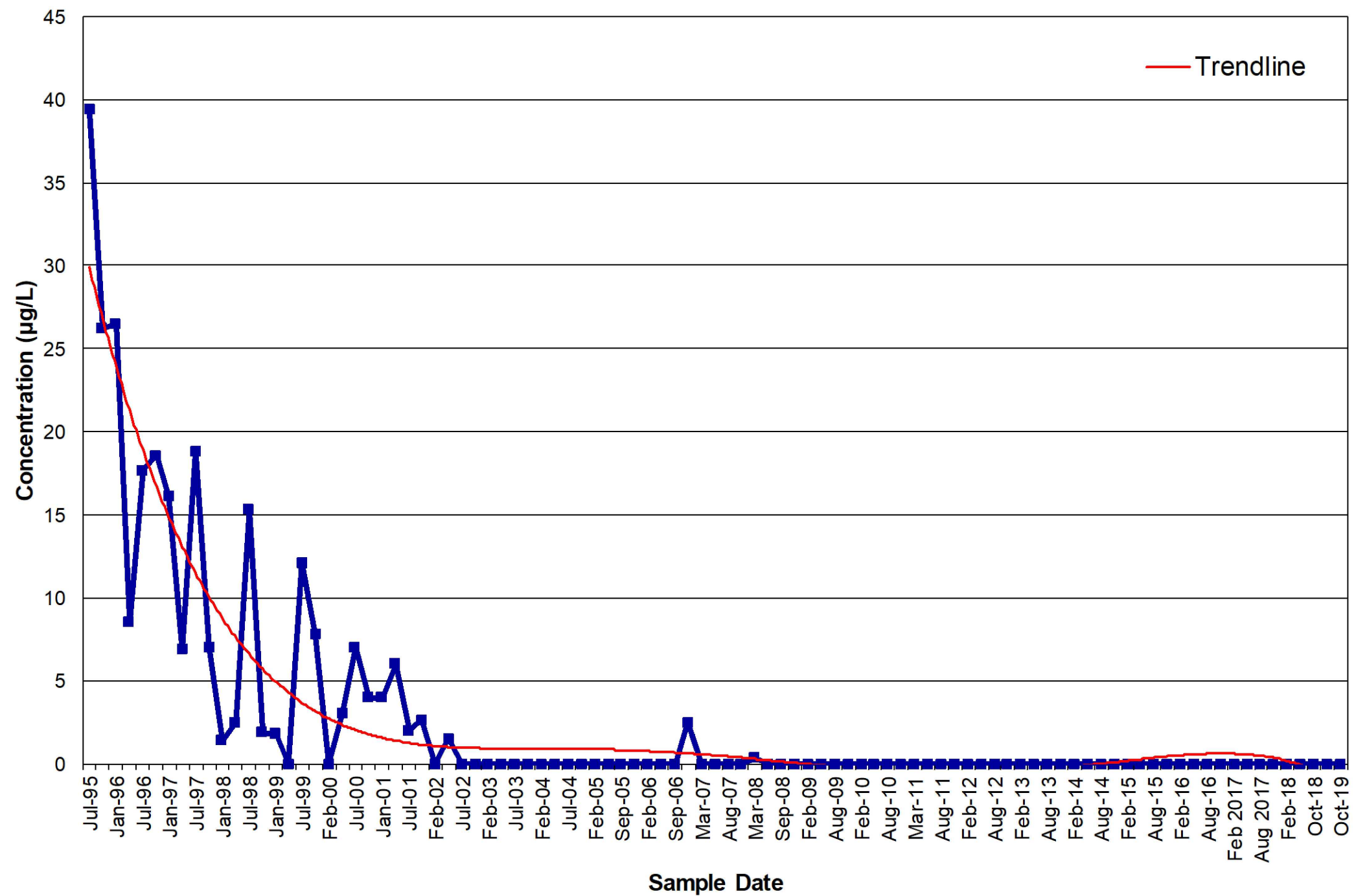


figure 2.4

HISTORICAL CONCENTRATIONS OF TOTAL TARGETED SITE COMPOUNDS

MW-19I

DUREZ INLET SITE

GLENN SPRINGS HOLDINGS, INC.

North Tonawanda, New York



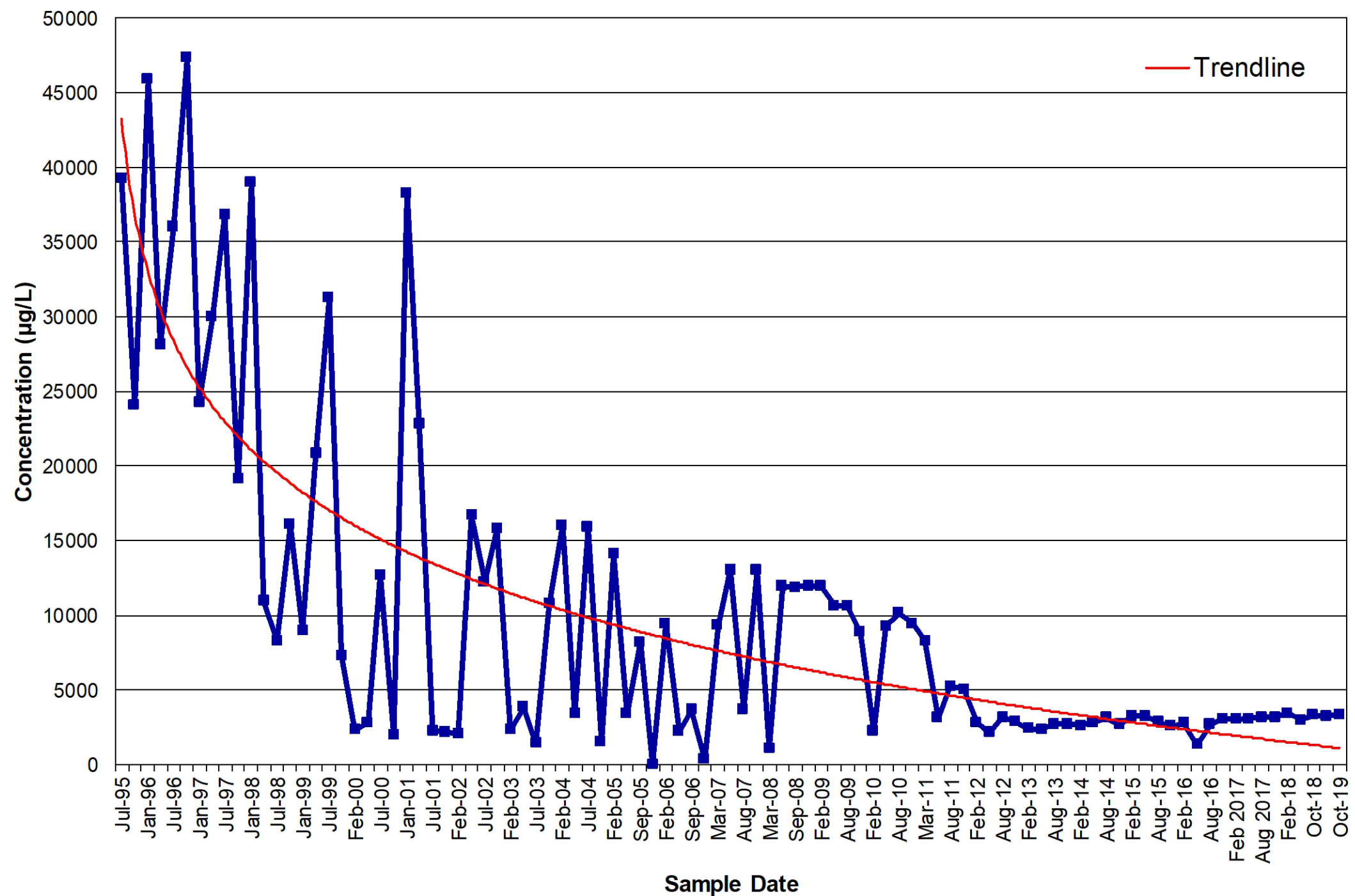


figure 2.5

HISTORICAL CONCENTRATIONS OF TOTAL TARGETED SITE COMPOUNDS

MW-201

DUREZ INLET SITE

GLENN SPRINGS HOLDINGS, INC.

North Tonawanda, New York



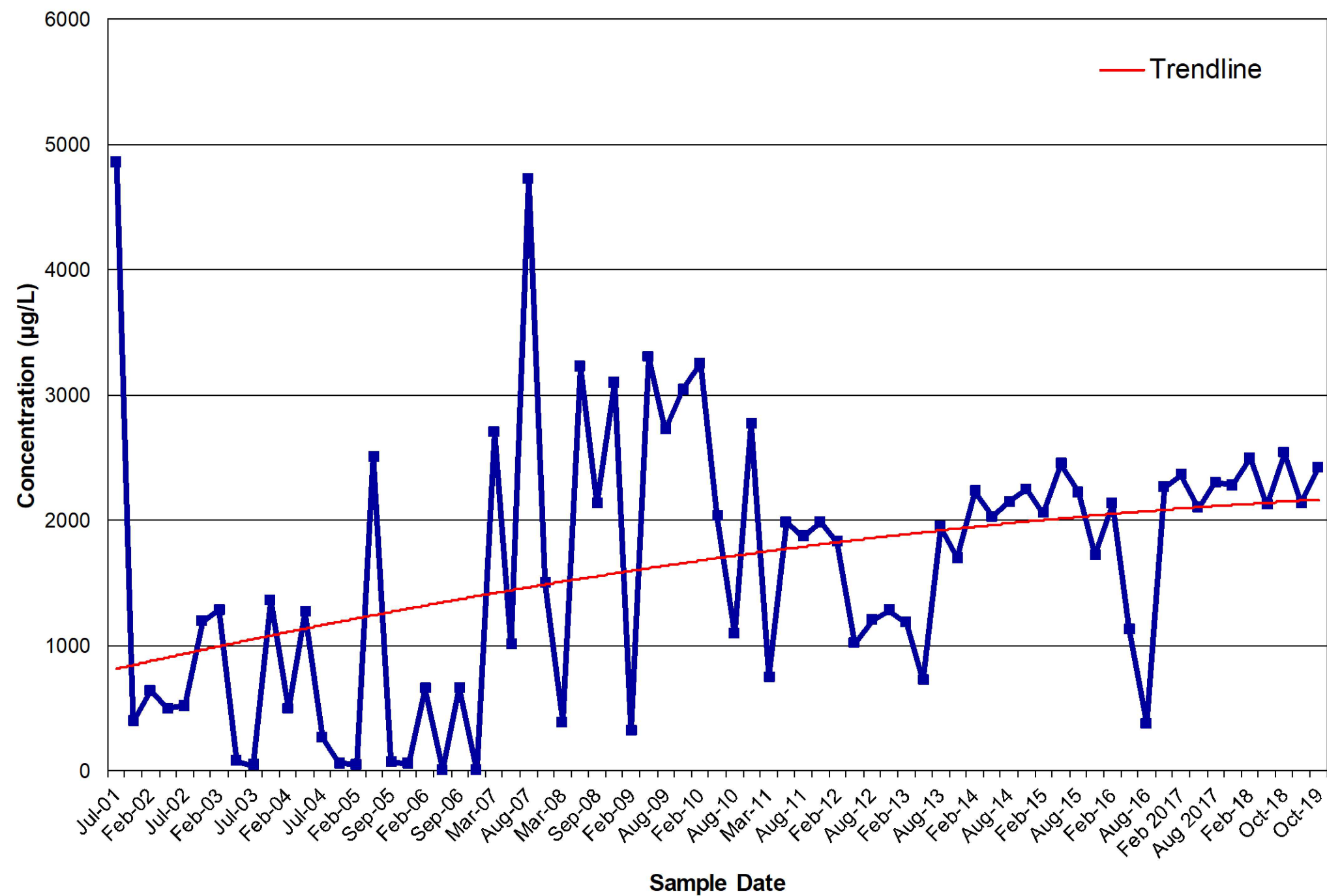


figure 2.6
 HISTORICAL CONCENTRATIONS OF TOTAL TARGETED SITE COMPOUNDS
 MW-22I
 DUREZ INLET SITE
 GLENN SPRINGS HOLDINGS, INC.
 North Tonawanda, New York



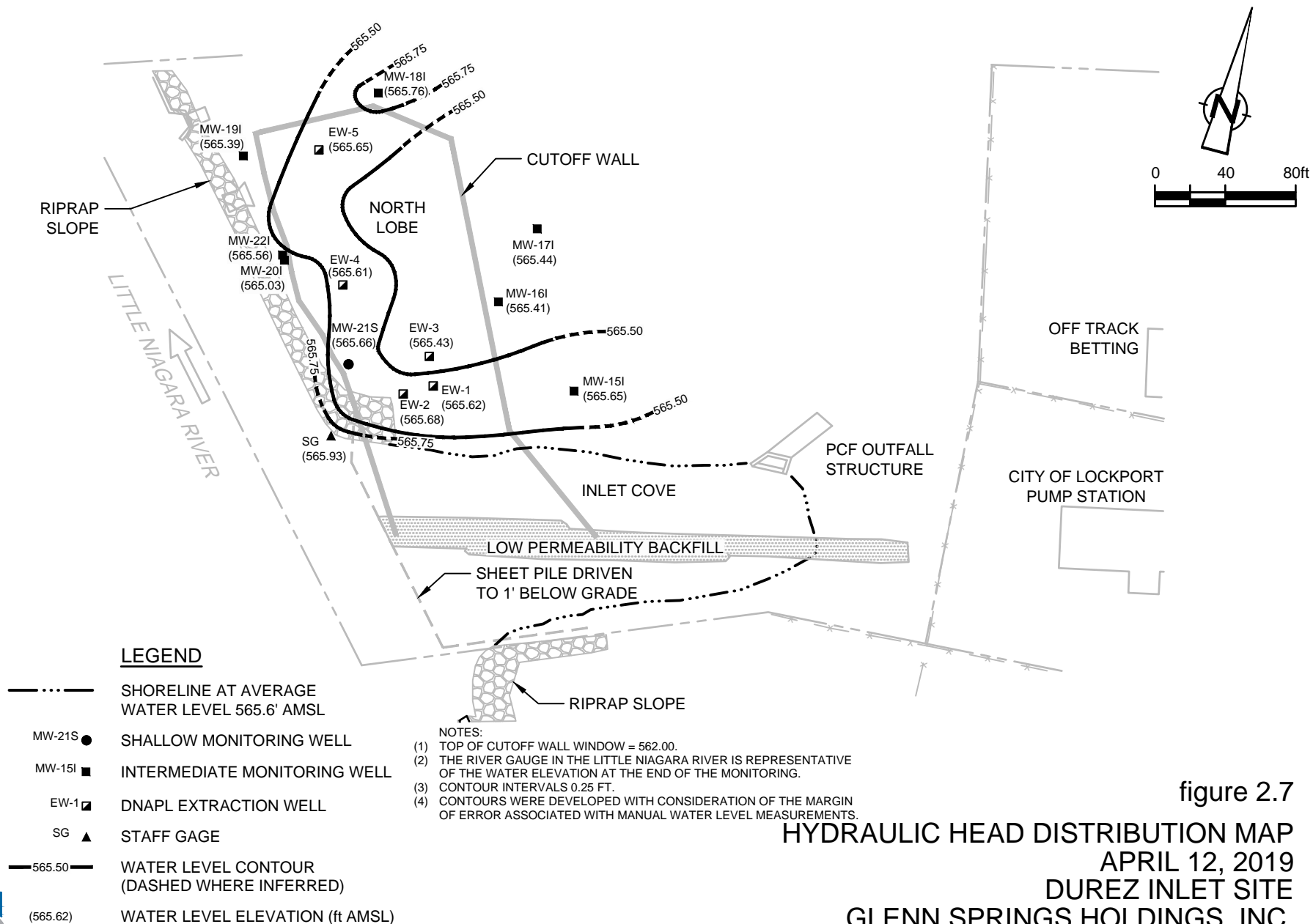


figure 2.7

HYDRAULIC HEAD DISTRIBUTION MAP
APRIL 12, 2019
DUREZ INLET SITE
GLENN SPRINGS HOLDINGS, INC.
North Tonawanda, New York



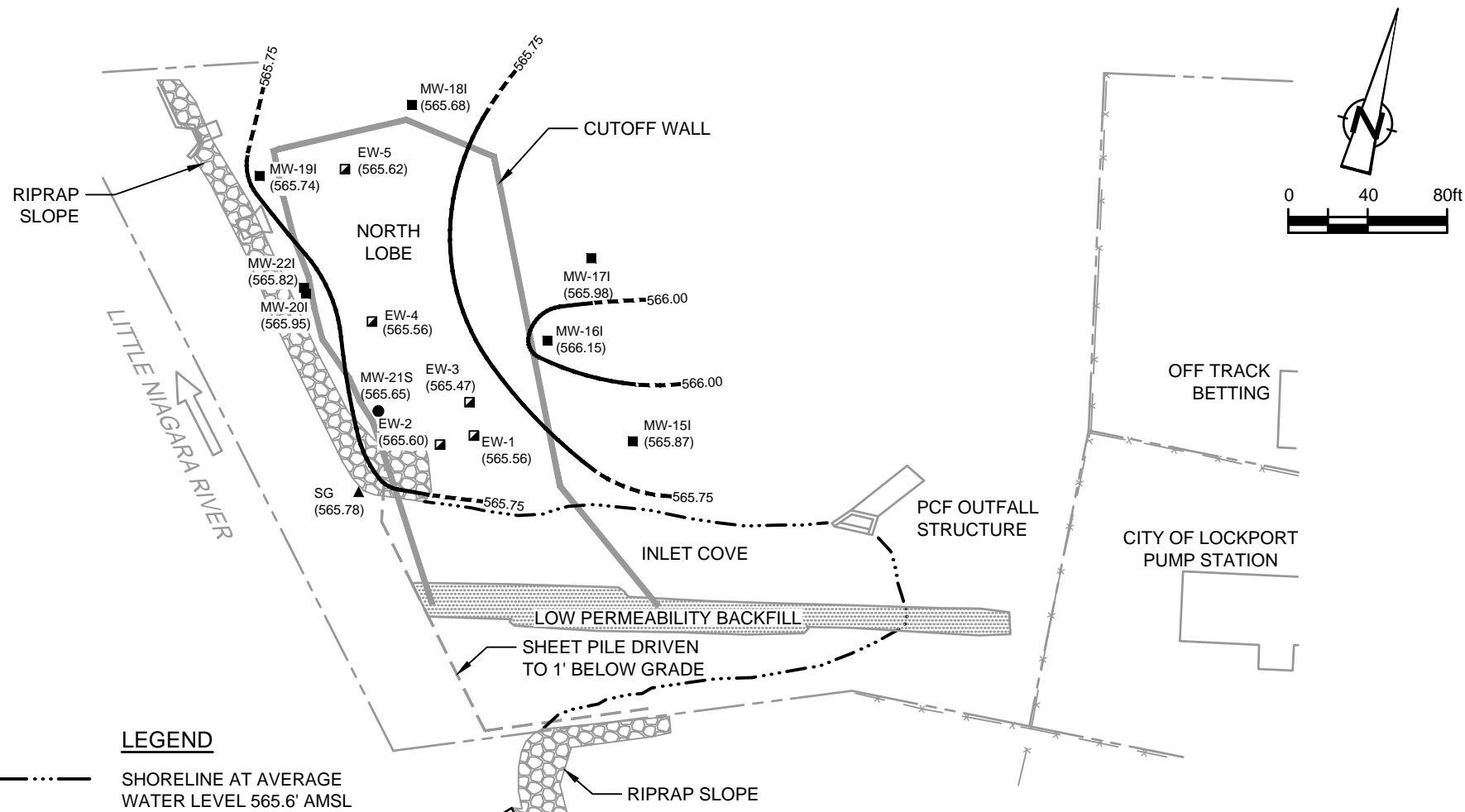


figure 2.8

HYDRAULIC HEAD DISTRIBUTION MAP
OCTOBER 21, 2019
DUREZ INLET SITE
GLENN SPRINGS HOLDINGS, INC.
North Tonawanda, New York



Table 2.1

2019 Groundwater Chemistry Monitoring - Analytical Results
Durez Inlet Remediation Project
Groundwater Monitoring Program
Durez Inlet Site

Compound/Parameter	* Standard Value (µg/L)	Reporting Limit (µg/L)	MW-16I		MW-18I	
			Apr 2019	Oct 2019	Apr 2019	Oct 2019
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	3	1	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U
Benzene	1	1	0.910 J	0.510 J / 0.520 J	1.0 U	1.0 U
Chlorobenzene	5	1	1.88	1.89 / 1.76	1.0 U	1.0 U
Toluene	5	1	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U
Total Targeted Site Compounds			2.79	2.40 / 2.28	0.0	0.0

Compound/Parameter	* Standard Value (µg/L)	Reporting Limit (µg/L)	MW-19I		MW-20I	
			Apr 2019	Oct 2019	Apr 2019	Oct 2019
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U	20.0 U	25.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U	20.0 U	25.0 U
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U	20.0 U	25.0 U
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U	23.6	22.8 J
1,4-Dichlorobenzene	3	1	1.0 U	1.0 U	388	398
Benzene	1	1	1.0 U	1.0 U	12.8 J	12.8 J
Chlorobenzene	5	1	1.0 U	1.0 U	2,830	2,940
Toluene	5	1	1.0 U	1.0 U	20.0 U	25.0 U
Total Targeted Site Compounds			0.0	0.0	3,254	3,374

Compound/Parameter	* Standard Value (µg/L)	Reporting Limit (µg/L)	MW-22I	
			Apr 2019	Oct 2019
1,2,3-Trichlorobenzene	5	1	20.0 U / 1.0 U	20.0 U
1,2,4-Trichlorobenzene	5	1	20.0 U / 1.0 U	20.0 U
1,2-Dichlorobenzene	3	1	20.0 U / 1.53	20.0 U
1,3-Dichlorobenzene	3	1	10.6 J / 10.4	11.4 J
1,4-Dichlorobenzene	3	1	122 / 117	160
Benzene	1	1	21.0 / 21.2	29.4
Chlorobenzene	5	1	1,930 / 2,040	2,220
Toluene	5	1	20.0 U / 1.0 U	20.0 U
Total Targeted Site Compounds			2,084 / 2,189	2421

Notes:

- J - Estimated
- U - Not detected at the associated reporting limit
- µg/L - Micrograms per liter
- * - New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)
- 8.5/9.0 - Results of investigative and duplicate sample
- 23.6 - Exceeds New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)

Table 2.2

**2019 Water Level Elevations
Durez Inlet Remediation Project
Groundwater Monitoring Program
Durez Inlet Site**

Well Number	Reference Point Elevation (ft. AMSL)	04/12/19	10/21/19
MW-15I	569.79	565.65	565.87
MW-16I	573.31	565.41	566.15
MW-17I	574.41	565.44	565.98
MW-18I	573.51	565.76	565.68
MW-19I	572.29	565.39	565.74
MW-20I	572.35	565.03	565.95
MW-21S	572.02	565.66	565.65
MW-22I	572.31	565.56	565.82
EW-1	572.09	565.62	565.56
EW-2	571.89	565.68	565.60
EW-3	572.29	565.43	565.47
EW-4	572.69	565.61	565.56
EW-5	573.06	565.65	565.62
SG ⁽¹⁾	567.66	565.93	565.78
SG ⁽²⁾	567.66	565.85	565.83

Notes:

Average elevation of the top of the cutoff wall is 562 feet AMSL

ft. AMSL - Feet Above Mean Sea Level

SG - Staff Gauge at the River

SG⁽¹⁾ - River measurement at the start of monitoring

SG⁽²⁾ - River measurement at the end of monitoring

Table 2.3

**2019 DNAPL Levels and Volumes
Durez Inlet Remediation Project
Groundwater Monitoring Program
Durez Inlet Site**

	Well Number	Elevation of Top of Pipe	Elevation of DNAPL (ft. AMSL)	Elevation of Top of Sump (ft. AMSL)	Height of DNAPL Above Top of Sump (ft.) *	Elevation of Top of Till (ft. AMSL)	Height of DNAPL Above Top of Till (ft.)	Elevation of Bottom of Sump (ft. AMSL)	DNAPL Above Bottom of Sump (ft.)	Amount of DNAPL in Well (Gallons)	Amount of DNAPL Pumped (Gallons)
01/14/19	EW-1	572.09	537.02	538.70	-1.68	540.10	-3.08	537.10	-0.08	-0.12	NP
	EW-2	571.89	538.43	538.52	-0.09	539.40	-0.97	536.92	1.51	2.26	1.75
	EW-3	572.29	537.74	538.10	-0.36	539.50	-1.76	536.50	1.24	1.86	NP
	EW-4	572.69	536.81	538.20	-1.39	539.50	-2.69	536.60	0.21	0.32	NP
	EW-5	573.06	538.25	539.20	-0.95	540.00	-1.75	537.60	0.65	0.97	NP
02/27/19	EW-1	572.09	537.15	538.70	-1.55	540.10	-2.95	537.10	0.05	0.08	NP
	EW-2	571.89	537.70	538.52	-0.82	539.40	-1.70	536.92	0.78	1.17	NP
	EW-3	572.29	537.69	538.10	-0.41	539.50	-1.81	536.50	1.19	1.78	NP
	EW-4	572.69	536.78	538.20	-1.42	539.50	-2.72	536.60	0.18	0.27	NP
	EW-5	573.06	538.35	539.20	-0.85	540.00	-1.65	537.60	0.75	1.12	NP
03/25/19	EW-1	572.09	537.20	538.70	-1.50	540.10	-2.90	537.10	0.10	0.15	NP
	EW-2	571.89	537.71	538.52	-0.81	539.40	-1.69	536.92	0.79	1.19	NP
	EW-3	572.29	537.79	538.10	-0.31	539.50	-1.71	536.50	1.29	1.93	NP
	EW-4	572.69	536.74	538.20	-1.46	539.50	-2.76	536.60	0.14	0.00	NP
	EW-5	573.06	538.54	539.20	-0.66	540.00	-1.46	537.60	0.94	1.41	NP
04/12/19	EW-1	572.09	537.15	538.70	-1.55	540.10	-2.95	537.10	0.05	0.08	NP
	EW-2	571.89	537.66	538.52	-0.86	539.40	-1.74	536.92	0.74	1.11	NP
	EW-3	572.29	537.77	538.10	-0.33	539.50	-1.73	536.50	1.27	1.90	NP
	EW-4	572.69	536.67	538.20	-1.53	539.50	-2.83	536.60	0.07	0.11	NP
	EW-5	573.06	538.29	539.20	-0.91	540.00	-1.71	537.60	0.69	1.03	NP
10/21/19	EW-1	572.09	537.57	538.70	-1.13	540.10	-2.53	537.10	0.47	0.71	NP
	EW-2	571.89	537.63	538.52	-0.89	539.40	-1.77	536.92	0.71	1.07	NP
	EW-3	572.29	537.76	538.10	-0.34	539.50	-1.74	536.50	1.26	1.89	NP
	EW-4	572.69	536.70	538.20	-1.50	539.50	-2.80	536.60	0.10	0.15	NP
	EW-5	573.06	538.20	539.20	-1.00	540.00	-1.80	537.60	0.60	0.90	NP

Notes:

- Dense non-aqueous phase liquid (DNAPL) volume was calculated based on a 1.5-gallon/foot multiplier for a 6-inch diameter pipe
- x.xx - (Negative value) DNAPL level is below the reference point
- ft. AMSL - Feet Above Mean Sea Level
- NP - Not pumped
- * - Positive value indicates a requirement to remove DNAPL from well

Table 2.4

**Cumulative DNAPL Extracted from Site - from Remediation
August 1993 to Present
Durez Inlet Remediation Project
Groundwater Monitoring Program
Durez Inlet Site**

Period	Cumulative (gallons)	Extraction Wells (gallons)
Remediation ⁽¹⁾	880.0	
Year One, May 1995 - April 1996	959.3	79.3
Year Two, May 1996 - April 1997	1012.5	53.2
Year Three, May 1997 - April 1998	1041.5	29.0
Year Four, May 1998 - April 1999	1075.5	34.0
Year Five, May 1999 - April 2000	1099.5	24.0
Year Six, May 2000 - April 2001	1112.0	12.5
*Year Seven, May - December 2001	1116.0	4.0
Year Eight, January - December 2002	1116.0	0.0
Year Nine, January - December 2003	1116.0	0.0
Year Ten, January - December 2004	1116.0	0.0
Year Eleven, January - December 2005	1116.0	0.0
Year Twelve, January - December 2006	1116.0	0.0
Year Thirteen, January - December 2007	1116.0	0.0
Year Fourteen, January - December 2008	1116.0	0.0
Year Fifteen, January - December 2009	1121.0	5.0
Year Sixteen, January - December 2010	1126.3	5.3
Year Seventeen, January - December 2011	1128.8	2.5
Year Eighteen, January - December 2012	1130.8	2.0
Year Nineteen, January - December 2013	1131.8	1.0
Year Twenty, January - December 2014	1133.4	1.6
Year Twenty-One, January - December 2015	1133.4	0.0
Year Twenty-Two, January - December 2016	1133.4	0.0
Year Twenty-Three, January - December 2017	1133.4	0.0
Year Twenty-Four, January - December 2018	1133.4	0.0
Year Twenty-Five, January - December 2019	1135.1	1.8
Total:	1135.1	255.1

Notes:

- ⁽¹⁾ - Remediation of the Site was completed between August 1993 to April 1995
 * - Minor Change 11, annual reporting year January-December
 DNAPL - Dense non-aqueous phase liquid

Appendices

Appendix A

Institutional and Engineering Controls Certification Form

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation

625 Broadway, 11th Floor, Albany, NY 12233-7020

P: (518)402-9543 | F: (518)402-9547

www.dec.ny.gov

11/21/2019

Joseph Branch
Project Manager
OCC/Glenn Springs Holdings, Inc.
7601 Old Channel Trail
Montague, MI 49437

Re: Reminder Notice: Site Management Periodic Review Report and IC/EC Certification Submittal

Site Name: Durez Div. - Occidental Chemical Corp.

Site No.: 932018

Site Address: Walck Road/River Road
North Tonawanda, NY 14120

Dear Joseph Branch:

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 **January 30, 2020**. 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 Professional Engineer (PE). 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.



Department of
Environmental
Conservation

All site-related documents and data, including the PRR, must be submitted in electronic format to the Department of Environmental Conservation. The required format for documents is an Adobe PDF file with optical character recognition and no password protection. Data must be submitted as an electronic data deliverable (EDD) according to the instructions on the following webpage:

<https://www.dec.ny.gov/chemical/62440.html>

Documents may be submitted to the project manager either through electronic mail or by using the Department's file transfer service at the following webpage:

<https://fts.dec.state.ny.us/fts/>

The Department will not approve the PRR unless all documents and data generated in support of the PRR have been submitted using the required formats and protocols.

You may contact Brian Sadowski, the Project Manager, at 716-851-7220 or brian.sadowski@dec.ny.gov with any questions or concerns about the site. Please notify the project manager before conducting inspections or field work. You may also write to the project manager at the following address:

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

Enclosures

PRR General Guidance
Certification Form Instructions
Certification Forms

cc: w/ enclosures

Oar Marina, LLC

ec: w/ enclosures

Brian Sadowski, Project Manager
Stanley Radon, Hazardous Waste Remediation Supervisor, Region 9

GHD - Margaret Popek - margaret.popek@ghd.com
GHD - John Pentilchuk - jpentilchuk@ghd.com
ghd - dennis hoyt - dennis.hoyt@ghd.com

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. 932018

Site Name Durez Div. - Occidental Chemical Corp.

Site Address: Walck Road/River Road Zip Code: 14120

City/Town: North Tonawanda

County: Niagara

Site Acreage: ~~70.000~~ 72.23

Walck Road: 67.45 acres

River Road: 4.78 acres

Reporting Period: December 31, 2018 to December 31, 2019

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

Description of Institutional ControlsParcelOwnerInstitutional Control**181.20-2-9**

Oar Marina, LLC

Monitoring Plan
O&M Plan

Site Operation, Maintenance and Monitoring (OMM) is conducted by the RP in accordance with the February 1989 Record of Decision and approved work plans. At the Inlet Site, site management includes groundwater quality monitoring, NAPL removal from extraction wells during the off-boating season and maintenance of the cover system.

Groundwater Quality Monitoring; Durez Third Stipulation and PCJ and associated minor changes to the PCJ (currently minor change number 10, Rev.2, September 1999).

DNAPL Removal; Inlet Monitoring Plan, Rust 1995.

182.06-3-19

Occidental Chemical Corporation

Monitoring Plan
O&M Plan

Site Operation, Maintenance and Monitoring (OMM) is conducted by the RP in accordance with the February 1989 Record of Decision and approved work plans.

182.06-3-20

Occidental Chemical Corporation

Monitoring Plan
O&M Plan

Site Operation, Maintenance and Monitoring (OMM) is conducted by the RP in accordance with the February 1989 Record of Decision and approved work plans.

182.06-3-21

Occidental Chemical Corporation

Monitoring Plan
O&M Plan

Site Operation, Maintenance and Monitoring (OMM) is conducted by the RP in accordance with the February 1989 Record of Decision and approved work plans.

182.07-1-14

Occidental Chemical Corporation

Monitoring Plan
O&M Plan

Appendix B, Durez Partial Consent Judgement (PCJ) "Monitoring, Operations, and Maintenance Plan" (1989) Subsequent Minor Modification #10, Rev. 2 "Minor Change to Appendix B" Monitoring, Operations, and Maintenance Plan" (September 1999) (Minor Change No. 10) groundwater monitoring.

PCJ 1992; amended by Minor Change No. 5 to allow for semi-annual reporting to the NYSDEC on quarterly hydraulic groundwater data.

Plant Site: OMM includes operation, maintenance and monitoring of the cover system, groundwater collection system, groundwater conveyance system, groundwater treatment system, groundwater monitoring wells, fencing/access points and the panhandle area.

182.07-1-17

National Grid

Monitoring Plan
O&M Plan

Site Operation, Maintenance and Monitoring (OMM) is conducted by the RP in accordance with the February 1989 Record of Decision and approved work plans.

182.32.-1-47

Occidental Chemical Corporation

Monitoring Plan
O&M Plan

Site Operation, Maintenance and Monitoring (OMM) is conducted by the RP in accordance with the February 1989 Record of Decision and approved work plans.

Box 4

Description of Engineering Controls

Parcel

Engineering Control

181.20-2-9

Cover System
Groundwater Containment
Monitoring Wells
Subsurface Barriers

Sheet pile wall, NAPL extraction wells and cover system.

182.06-3-19

Groundwater Treatment System
Cover System
Groundwater Containment
Leachate Collection
Fencing/Access Control

At the Plant Site, OMM includes operation, maintenance and monitoring of the cover system, groundwater collection system, groundwater conveyance system, groundwater treatment system, groundwater monitoring wells, fencing/access points and the panhandle area.

182.06-3-20

Groundwater Treatment System
Cover System
Groundwater Containment
Leachate Collection
Fencing/Access Control

At the Plant Site, OMM includes operation, maintenance and monitoring of the cover system, groundwater collection system, groundwater conveyance system, groundwater treatment system, groundwater monitoring wells, fencing/access points and the panhandle area.

182.06-3-21

Parcel

Engineering Control

Groundwater Treatment System
Cover System
Groundwater Containment
Leachate Collection
Fencing/Access Control

At the Plant Site, OMM includes operation, maintenance and monitoring of the cover system, groundwater collection system, groundwater conveyance system, groundwater treatment system, groundwater monitoring wells, fencing/access points and the panhandle area.

182.07-1-14

Point-of-Entry Water Treatment
Monitoring Wells
Groundwater Treatment System
Cover System
Groundwater Containment
Leachate Collection
Fencing/Access Control

Soil cover system with encompassing groundwater interceptor trench and conveyance to an onsite treatment plant.

182.07-1-17

Monitoring Wells
Groundwater Treatment System
Cover System
Groundwater Containment
Leachate Collection
Fencing/Access Control

At the Plant Site, OMM includes operation, maintenance and monitoring of the cover system, groundwater collection system, groundwater conveyance system, groundwater treatment system, groundwater monitoring wells and fencing/access points. The Right Of Way (ROW) for National Grid is on site. Reporting is done by the RP; OCC/Glenn Springs Holdings, Inc.

182.32.-1-47

Groundwater Treatment System
Cover System
Groundwater Containment
Leachate Collection
Fencing/Access Control

At the Plant Site, OMM includes operation, maintenance and monitoring of the cover system, groundwater collection system, groundwater conveyance system, groundwater treatment system, groundwater monitoring wells, fencing/access points and the panhandle area.

Periodic Review Report (PRR) Certification Statements

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

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

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

YES NO

☒ ☐

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

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

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

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

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

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

YES NO

☒ ☐

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. 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. 932018

Box 6

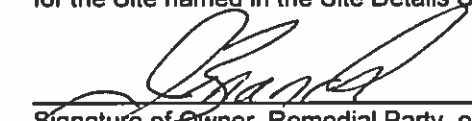
SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

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 Joseph A. Branch at 7601 Old Channel Trail, Montague, MI 49437,
print name print business address

am certifying as Owner (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

3/31/2020
Date

IC/EC CERTIFICATIONS

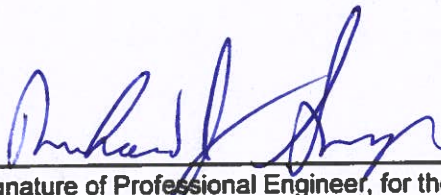
Box 7

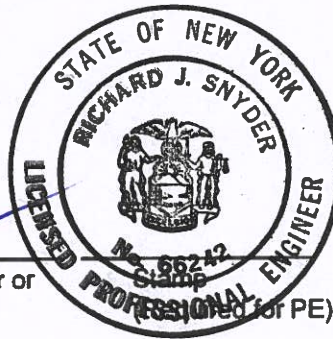
Professional Engineer Signature

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 Richard J. Snyder at 2055 Niagara Falls Blvd, Niagara Falls,
print name print business address NY

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


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



March 25, 2020
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.

Appendix B

Historical Groundwater Chemistry Monitoring - Analytical Results

Historical Groundwater Chemistry Monitoring - Analytical Results
Durez Inlet Remediation Project
Groundwater Monitoring Program
Durez Inlet Site

MW-16I

Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	Reported Values													
			Jul-95	Oct-95	Jan-96	Apr-96	Jul-96	Oct-96	Jan-97	Apr-97	Jul-97	Oct-97	Jan-98	Apr-98	Jul-98	Oct-98
Benzene	1	1	1.0 U	1.0 U	0.62 J	5.4	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.1 U	1.0 U	1.0 U	1.0 U/1.0 U
Toluene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.1 U	1.0 U	1.0 U	1.0 U/1.0 U
Chlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.1 U	1.0 U	1.0 U	1.0 U/1.0 U
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.1 U	1.0 U	1.0 U	1.0 U/1.0 U
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.1 U	1.0 U	1.0 U	1.0 U/1.0 U
1,4-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.1 U	1.0 U	1.0 U	1.0 U/1.0 U
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.1 U	1.0 U	1.0 U	1.0 U/1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.1 U	1.0 U	1.0 U	1.0 U/1.0 U
Total Targeted Site Compounds			0.0	0.0	0.62	5.40	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

			Reported Values													
			Jan-99	Apr-99	Jul-99	Oct-99	Feb-00	Apr-00	Jul-00	Oct-00	Jan-01	Apr-01	Jul-01	Oct-01	Feb-02	May-02
Benzene	1	1	1.0 U/2.8	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1 U	1 U	1 U/1 U	1.0 U	2.0 U/2.0 U	1 U	1.00 U	1.00 U	1.00 U
Toluene	5	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1 U	1 U	1 U/1 U	1.0 U	2.0 U/2.0 U	1 U	1.00 U	1.00 U	1.00 U
Chlorobenzene	5	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1 U	1 U	2/4	1.0 U	2.0 U/2.0 U	1 U	1.00 U	1.00 U	1.00 U
1,2-Dichlorobenzene	3	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1 U	1 U	1 U/1 U	1.0 U	2.0 U/2.0 U	1 U	1.00 U	1.00 U	1.00 U
1,3-Dichlorobenzene	3	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1 U	1 U	1 U/1 U	1.0 U	2.0 U/2.0 U	1 U	1.00 U	1.00 U	1.00 U
1,4-Dichlorobenzene	3	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1 U	1 U	1 U/1 U	1.0 U	2.0 U/2.0 U	1 U	1.00 U	1.00 U	1.00 U
1,2,3-Trichlorobenzene	5	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1 U	1 U	1 U/1 U	1.0 U	2.0 U/2.0 U	1 U	1.00 U	1.00 U	1.00 U
1,2,4-Trichlorobenzene	5	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1 U	1 U	1 U/1 U	1.0 U	2.0 U/2.0 U	1 U	1.00 U	1.00 U	1.00 U
Total Targeted Site Compounds			0.0/2.8	0.0/0.0	0.0/0.0	0.0/0.0	0.0	0.0	0.0	2/4	0.0	0.0/0.0	0.0	0.0	0.0	0.0

			Reported Values													
			Jul-02	Oct-02	Feb-03	May-03	Jul-03	Oct-03	Feb-04	May-04	Jul-04	Oct-04	Feb-05	Jun-05	Sep-05	Dec-05
Benzene	1	1	1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
Toluene	5	1	1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
Chlorobenzene	5	1	1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
1,2-Dichlorobenzene	3	1	1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
1,3-Dichlorobenzene	3	1	1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
1,4-Dichlorobenzene	3	1	1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
1,2,3-Trichlorobenzene	5	1	1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
1,2,4-Trichlorobenzene	5	1	1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
Total Targeted Site Compounds			0.0	0.0	0.0	0.0/0.0	0.0	0.0	0.0/0.0	0.0	0.0/0.0	0.0	0.0	0.0	0.0	0.0

Notes:

J - Estimated

U - Not detected at the associated reporting limit

UJ - Not detected; associated reporting limit is estimated

µg/L - Micrograms per liter

* - New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)

8.5/9.0 - Results of investigative and duplicate sample

38 - Exceeds New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)

Historical Groundwater Chemistry Monitoring - Analytical Results
Durez Inlet Remediation Project
Groundwater Monitoring Program
Durez Inlet Site

MW-16I - Continued

Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	Reported Values													
			Feb-06	Jun-06	Sep-06	Dec-06	Mar-07	Jun-07	Aug-07	Nov-07	Mar-08	Jun-08	Sep-08	Jan-09	Feb-09	May-09
Benzene	1	1	1.0 U	1.0 U	0.47 J	0.54 J	1.0 U	1.0 U	0.55 J	0.64 J	0.34 J	0.42 J	1.0 U	0.62 J/0.67 J	1.0 U	0.70 J
Toluene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U
Chlorobenzene	5	1	1.0 U	16	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.23 J	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	3	1	1.0 U	0.13 J	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	3	1	1.0 U	1.5	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U
Total Targeted Site Compounds			0.0	17.63	0.47	0.54	0.0	0.0	0.55	0.64	0.57	0.42	0.0	0.62/0.67	0.0	0.7

			Reported Values													
			Aug-09	Nov-09	Feb-10	May-10	Aug-10	Nov-10	Mar-11	May-11	Aug-11	Nov-11	Feb-12	May-12	Aug-12	Nov-12
Benzene	1	1	1.2	0.68 J	0.84 J	0.77 J	0.61 J	0.57 J	0.60 J	0.64 J/0.63 J	0.76 J/0.71 J	0.94 J/0.96 J	0.89 J/0.88 J	0.63 J/0.68 J	0.65 J/0.68 J	0.95 J
Toluene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U
Chlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	0.22 J/0.22 J	0.17 J/0.21 J	1.0 U/1.0 U	0.23 J/0.23 J	0.22 J
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U
1,4-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U
Total Targeted Site Compounds			1.2	0.68	0.84	0.77	0.61	0.57	0.60	0.64/0.63	0.76/0.71	1.16/1.18	1.06/1.09	0.63/0.68	0.88/0.91	1.17

			Reported Values													
			Feb-13	May-13	Aug-13	Nov-13	Feb-14	May-14	Aug-14	Nov-14	Feb-15	May-15	Aug-15	Nov-15	Feb-16	May-16
Benzene	1	1	0.80 J	0.73 J/0.67 J	0.84 J	1.1/1.0	0.58 J	1.1	0.90 J/0.88 J	1.1	0.23 J	1.2 / 1.2	0.95 J	0.93 J	1.3	0.92 J
Toluene	5	1	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	5	1	1.0 U	0.18 J/1.0 U	0.24 J	0.35 J/0.42 J	0.20 J	0.48 J	0.39 J/0.42 J	0.46 J	1.0 U	0.78 J / 0.72 J	0.92 J	0.75 J	1.1	1.1
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	3	1	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Total Targeted Site Compounds			0.80	0.91/0.67	1.08	1.45/1.42	0.78	1.58	1.29 J/1.30 J	1.56	0.23	1.98 / 1.92	1.87	1.68	2.4	2.0

			Reported Values										
			Aug-16	Nov-16	Feb-17	May-17	Aug-17	Nov-17	Feb-18	May-18	Oct-18	Apr-19	Oct-19
Benzene	1	1	0.72 J	0.70 J	1.1	1.0 U	0.74 J / 0.75 J	0.69 J / 0.67 J	1.1 / 1.1	0.970 J / 0.978 J	0.760 J / 0.730 J	0.910 J	0.510 J / 0.520 J
Toluene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.00 U / 1.00 U	1.00 U / 1.00 U	1.0 U	1.0 U / 1.0 U
Chlorobenzene	5	1	0.97 J	0.82 J	1.3	1.3	1.6 / 1.6	1.2 / 1.2	1.6 / 1.6	1.71 / 1.76	1.47 / 1.57	1.88	1.89 / 1.76
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.00 U / 1.00 U	1.00 U / 1.00 U	1.0 U	1.0 U / 1.0 U
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.00 U / 1.00 U	1.00 U / 1.00 U	1.0 U	1.0 U / 1.0 U
1,4-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.00 U / 1.00 U	1.00 U / 1.00 U	1.0 U	1.0 U / 1.0 U
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.00 U / 1.00 U	1.00 U / 1.00 U	1.0 U	1.0 U / 1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.00 U / 1.00 U	1.00 U / 1.00 U	1.0 U	1.0 U / 1.0 U
Total Targeted Site Compounds			1.69	1.52	2.40	1.3	2.34 / 2.33	1.87	2.7 / 2.7	2.68 / 2.74	2.23 / 2.30	2.79	2.40 / 2.28

Notes:

J - Estimated

U - Not detected at the associated reporting limit

UJ - Not detected; associated reporting limit is estimated

µg/L - Micrograms per liter

* - New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)

8.5/9.0 - Results of investigative and duplicate sample

38 - Exceeds New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)

Historical Groundwater Chemistry Monitoring - Analytical Results
Durez Inlet Remediation Project
Groundwater Monitoring Program
Durez Inlet Site

MW-18I

Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	Reported Values													
			Jul-95	Oct-95	Jan-96	Apr-96	Jul-96	Oct-96	Jan-97	Apr-97	Jul-97	Oct-97	Jan-98	Apr-98	Jul-98	Oct-98
Benzene	1	1	1.0 U	1.4	8.5 J	0.9 J/0.8 J	1.0 U/1.0 U	1.0 U/0.38 J	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
Toluene	5	1	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
Chlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/0.21 J	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
1,4-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
Total Targeted Site Compounds			0.0	1.4	8.5	0.9 J/0.8 J	0.0/0.0	0.0/0.59 J	0.0/0.0	0.0/0.0	0.0/0.0	0.0/0.0	0.0/0.0	0.0/0.0	0.0/0.0	0.0/0.0

			Reported Values													
			Jan-99	Apr-99	Jul-99	Oct-99	Feb-00	Apr-00	Jul-00	Oct-00	Jan-01	Apr-01	Jul-01	Oct-01	Feb-02	May-02
Benzene	1	1	2.6/2.8	1.9/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1 U/1 U	1 U/1 U	1 U	1 U/1 U	2 U	1 U/1 U	1.00 U/1.00 U	1.00 U	1.00 U
Toluene	5	1	1.0 U/1.0 U	1.4/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1 U/1 U	1 U/1 U	1 U	1 U/1 U	2 U	1 U/1 U	1.00 U/1.00 U	1.00 U	1.00 U
Chlorobenzene	5	1	1.0/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1 U/1 U	1 U/1 U	1 U	1 U/1 U	2 U	1 U/1 U	1.00 U/1.00 U	1.00 U	1.00 U
1,2-Dichlorobenzene	3	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1 U/1 U	1 U/1 U	1 U	1 U/1 U	2 U	1 U/1 U	1.00 U/1.00 U	1.00 U	1.00 U
1,3-Dichlorobenzene	3	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1 U/1 U	1 U/1 U	1 U	1 U/1 U	2 U	1 U/1 U	1.00 U/1.00 U	1.00 U	1.00 U
1,4-Dichlorobenzene	3	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1 U/1 U	1 U/1 U	1 U	1 U/1 U	2 U	1 U/1 U	1.00 U/1.00 U	1.00 U	1.00 U
1,2,3-Trichlorobenzene	5	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1 U/1 U	1 U/1 U	1 U	1 U/1 U	2 U	1 U/1 U	1.00 U/1.00 U	1.00 U	1.00 U
1,2,4-Trichlorobenzene	5	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1 U/1 U	1 U/1 U	1 U	1 U/1 U	2 U	1 U/1 U	1.00 U/1.00 U	1.00 U	1.00 U
Total Targeted Site Compounds			3.6/2.8	3.3/0.0	0.0/0.0	0.0	0.0/0.0	0.0/0.0	0.0/0.0	0.0	0.0/0.0	0.0	0.0/0.0	0.0/0.0	0.0	0.0

			Reported Values													
			Jul-02	Oct-02	Feb-03	May-03	Jul-03	Oct-03	Feb-04	May-04	Jul-04	Oct-04	Feb-05	Jun-05	Sep-05	Dec-05
Benzene	1	1	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
Toluene	5	1	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
Chlorobenzene	5	1	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
1,2-Dichlorobenzene	3	1	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
1,3-Dichlorobenzene	3	1	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
1,4-Dichlorobenzene	3	1	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
1,2,3-Trichlorobenzene	5	1	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
1,2,4-Trichlorobenzene	5	1	1.00 U/1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 UJ
Total Targeted Site Compounds			0.0/0.0	0.0	0.0/0.0	0.0	0.0	0.0/0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

- Notes:
- J - Estimated
 - U - Not detected at the associated reporting limit
 - UJ - Not detected; associated reporting limit is estimated
 - µg/L - Micrograms per liter
 - * - New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)
 - 8.5/9.0 - Results of investigative and duplicate sample
 - 38 - Exceeds New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)

Historical Groundwater Chemistry Monitoring - Analytical Results
Durez Inlet Remediation Project
Groundwater Monitoring Program
Durez Inlet Site

MW-18I - Continued

Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	Reported Values													
			Feb-06	Jun-06	Sep-06	Dec-06	Mar-07	Jun-07	Aug-07	Nov-07	Mar-08	Jun-08	Sep-08	Jan-09	Feb-09	May-09
Benzene	1	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U/1.0 U
Toluene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U/1.0 U
Chlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/0.18 J	1.0 U/1.0 U	0.17 J	1.0 U	1.0 U/1.0 U	1.0 UJ	1.0 U	1.0 U/1.0 U
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 UJ	1.0 U	1.0 U/1.0 U
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 UJ	1.0 U	1.0 U/1.0 U
1,4-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 UJ	1.0 U	1.0 U/1.0 U
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U/1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U/1.0 U
Total Targeted Site Compounds			0.0	0.0	0.0	0.0	0.0	0.0	0.0/0.18	0.0	0.17	0.0	0.0/0.0	0.0	0.0	0.0/0.0

			Reported Values													
			Aug-09	Nov-09	Feb-10	May-10	Aug-10	Nov-10	Mar-11	May-11	Aug-11	Nov-11	Feb-12	May-12	Aug-12	Nov-12
Benzene	1	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Toluene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 UJ	1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 UJ	1.0 U
Total Targeted Site Compounds			0.0	0.0	0.0	0.0	0.0	0.0/0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

			Reported Values													
			Feb-13	May-13	Aug-13	Nov-13	Feb-14	May-14	Aug-14	Nov-14	Feb-15	May-15	Aug-15	Nov-15	Feb-16	May-16
Benzene	1	1	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U /1.0 U	1.0 U /1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U
Toluene	5	1	1.0 U/0.20 J	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U /1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U
Chlorobenzene	5	1	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U
1,2-Dichlorobenzene	3	1	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U
1,3-Dichlorobenzene	3	1	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U
1,4-Dichlorobenzene	3	1	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U
1,2,3-Trichlorobenzene	5	1	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U
Total Targeted Site Compounds			0/0.20	0.0	0.0/0.0	0.0	0/0	0/0	0	0	0	0	0 / 0	0 / 0	0.0	0.0

			Reported Values										
			Aug-16	Nov-16	Feb-17	May-17	Aug-17	Nov-17	Feb-18	May-18	Oct-18	Apr-19	Oct-19
Benzene	1	1	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U
Toluene	5	1	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U
Chlorobenzene	5	1	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U
1,2-Dichlorobenzene	3	1	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U
1,3-Dichlorobenzene	3	1	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U
1,4-Dichlorobenzene	3	1	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U
1,2,3-Trichlorobenzene	5	1	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U
Total Targeted Site Compounds			0 / 0	0 / 0	0 / 0	0 / 0	0	0	0	0	0	0	0

Notes:

J - Estimated

U - Not detected at the associated reporting limit

UJ - Not detected; associated reporting limit is estimated

µg/L - Micrograms per liter

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38 - Exceeds New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)

Historical Groundwater Chemistry Monitoring - Analytical Results
Durez Inlet Remediation Project
Groundwater Monitoring Program
Durez Inlet Site

MW-191

Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	Reported Values													
			Jul-95	Oct-95	Jan-96	Apr-96	Jul-96	Oct-96	Jan-97	Apr-97	Jul-97	Oct-97	Jan-98	Apr-98	Jul-98	Oct-98
Benzene	1	1	6.2	7.2	9.1 J	0.9 J	0.24 J	0.29 J	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Toluene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	5	1	25	14	13	3.8	13	13	12	5.0	14.0	5.2	1.4	1.5	11	1.9
1,2-Dichlorobenzene	3	1	5.8	3.3	3	2.6	3.1	3.2	2.8	1.9	3.4	1.8	1.0 U	1.0	3.1	1.0 U
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.59 J	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	3	1	2.4	1.7	1.4	1.2	1.4	1.5	1.3	1.0 U	1.4	1.0 U	1.0 U	1.0 U	1.2	1.0 U
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Total Targeted Site Compounds			39.4	26.2	26.5	8.5	17.7	18.58 J	16.1	6.9	18.8	7.0	1.4	2.5	15.3	1.9

			Reported Values													
			Jan-99	Apr-99	Jul-99	Oct-99	Feb-00	Apr-00	Jul-00	Oct-00	Jan-01	Apr-01	Jul-01	Oct-01	Feb-02	May-02
Benzene	1	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1 U	1 U	1 U	1 U	2 U	1 U	1.00 U	1.00 U	1.00 U
Toluene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1 U	1 U	1 U	1 U	2 U	1 U	1.00 U	1.00 U	1.00 U
Chlorobenzene	5	1	1.8	1.0 U	7.2	4.0	1.0 U	2	3	3	3	3	1	2.63	1.00 U	1.53
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U	3.1	2.3	1.0 U	1 U	3	1	1	3	1	1.00 U	1.00 U	1.00 U
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0	1 U	1 U	1 U	2 U	1 U	1.00 U	1.00 U	1.00 U
1,4-Dichlorobenzene	3	1	1.0 U	1.0 U	1.8	1.5	1.0 U	1 U	1	1 U	1 U	2 U	1 U	1.00 U	1.00 U	1.00 U
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1 U	1 U	1 U	1 U	2 U	1 U	1.00 U	1.00 U	1.00 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1 U	1 U	1 U	1 U	2 U	1 U	1.00 U	1.00 U	1.00 U
Total Targeted Site Compounds			1.8	0.0	12.1	7.8	0.0	3	7	4	4	6	2	2.63	0.0	1.53

			Reported Values													
			Jul-02	Oct-02	Feb-03	May-03	Jul-03	Oct-03	Feb-04	May-04	Jul-04	Oct-04	Feb-05	Jun-05	Sep-05	Dec-05
Benzene	1	1	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 UJ
Toluene	5	1	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 UJ
Chlorobenzene	5	1	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 UJ
1,2-Dichlorobenzene	3	1	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 UJ
1,3-Dichlorobenzene	3	1	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 UJ
1,4-Dichlorobenzene	3	1	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 UJ
1,2,3-Trichlorobenzene	5	1	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 UJ
1,2,4-Trichlorobenzene	5	1	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 UJ
Total Targeted Site Compounds			0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0/0.0	0.0

- Notes:
- J - Estimated
 - U - Not detected at the associated reporting limit
 - UJ - Not detected; associated reporting limit is estimated
 - µg/L - Micrograms per liter
 - * - New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)
 - 8.5/9.0 - Results of investigative and duplicate sample
 - 38 - Exceeds New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)

Historical Groundwater Chemistry Monitoring - Analytical Results
Durez Inlet Remediation Project
Groundwater Monitoring Program
Durez Inlet Site

MW-19I - Continued

Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	Reported Values													
			Feb-06	Jun-06	Sep-06	Dec-06	Mar-07	Jun-07	Aug-07	Nov-07	Mar-08	Jun-08	Sep-08	Jan-09	Feb-09	May-09
Benzene	1	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Toluene	5	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	5	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	2.5	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	0.18 J	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	3	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	0.16 J	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	3	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 UJ	1.0 U	1.0 UJ	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	3	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 UJ	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2,3-Trichlorobenzene	5	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Total Targeted Site Compounds			0.0/0.0	0.0/0.0	0.0	2.5	0.0	0.0	0.0	0.0	0.34	0.0	0.0	0.0	0.0	0.0
Reported Values																
			Aug-09	Nov-09	Feb-10	May-10	Aug-10	Nov-10	Mar-11	May-11	Aug-11	Nov-11	Feb-12	May-12	Aug-12	Nov-12
Benzene	1	1	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
Toluene	5	1	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
Chlorobenzene	5	1	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
1,4-Dichlorobenzene	3	1	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 UJ	1.0 U/1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U/1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
Total Targeted Site Compounds			0.0	0.0	0.0	0.0/0.0	0.0/0.0	0.0	0.0	0.0	0.0	0.0	0.0	0/0	0/0	0/0
Reported Values																
			Feb-13	May-13	Aug-13	Nov-13	Feb-14	May-14	Aug-14	Nov-14	Feb-15	May-15	Aug-15	Nov-15	Feb-16	May-16
Benzene	1	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Toluene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 UJ	1.0 U	1.0 U
1,4-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Total Targeted Site Compounds			0.0	0.0	0.0	0.0	0	0	0	0/0	0 / 0	0	0.0	0 / 0	0 / 0	0.0
Reported Values																
			Aug-16	Nov-16	Feb-17	May-17	Aug-17	Nov-17	Feb-18	May-18	Oct-18	Apr-19	Oct-19			
Benzene	1	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U			
Toluene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U			
Chlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U			
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U			
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U			
1,4-Dichlorobenzene	3	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U			
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U			
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 U	1.0 U	1.0 U			
Total Targeted Site Compounds			0.0	0 / 0	0.0	0.0	0.0	0	0	0	0	0	0			

Notes:

J - Estimated

U - Not detected at the associated reporting limit

UJ - Not detected; associated reporting limit is estimated

µg/L - Micrograms per liter

* - New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)

8.5/9.0 - Results of investigative and duplicate sample

38 - Exceeds New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)

Historical Groundwater Chemistry Monitoring - Analytical Results
Durez Inlet Remediation Project
Groundwater Monitoring Program
Durez Inlet Site

MW-20I																
Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	Reported Values													
			Jul-95	Oct-95	Jan-96	Apr-96	Jul-96	Oct-96	Jan-97	Apr-97	Jul-97	Oct-97	Jan-98	Apr-98	Jul-98	Oct-98
Benzene	1	1	7700	3300	8300	4600	5500	6100	4300	4000	4800	3100	3200	1900	1000	2200
Toluene	5	1	1000 U	1000 U	500 U	100 U	500 U	2000 U	2000 U	2000 U	2000 U	2000 U	50 U	200 U	200 U	400 U
Chlorobenzene	5	1	28000	18000	32000	19000	27000	37000	20000	26000	32000	96000	32000	8100	6600	13000
1,2-Dichlorobenzene	3	1	2000	1400	2700	1300	1600	1,900 J	2000 U	2000 U	2000 U	2000 U	1100	310	200	400 U
1,3-Dichlorobenzene	3	1	1000 U	1000 U	370 J	210	260 J	2000 U	2000 U	2000 U	2000 U	2000 U	360	200 U	200 U	400 U
1,4-Dichlorobenzene	3	1	1600	1400	2500	1200	1700	2300	2000 U	2000 U	2000 U	2000 U	2300	630	500	870
1,2,3-Trichlorobenzene	5	1	1000 U	1000 U	500 U	100 U	500 U	2000 U	2000 U	2000 U	2000 U	2000 U	50 U	200 U	200 U	400 U
1,2,4-Trichlorobenzene	5	1	1000 U	1000 U	500 U	100 U	500 U	2000 U	2000 U	2000 U	2000 U	2000 U	50 U	200 U	200 U	400 U
Total Targeted Site Compounds			39300	24100	45870	26310	36060	47300	24300	30000	36800	99100	38960	10940	8300	16070
Reported Values																
			Jan-99	Apr-99	Jul-99	Oct-99	Feb-99	Apr-00	Jul-00	Oct-00	Jan-01	Apr-01	Jul-01	Oct-01	Feb-02	May-02
Benzene	1	1	1600	2660	3600	890	310	220	1100	230	1400	660	90	118	142/135	391
Toluene	5	1	400 U	50 U	1000 U	50 U	100 U	1 U	1	5 U	13 U	100 U	2 U	1.00 U	1.00 U/1.00 U	1.61 J
Chlorobenzene	5	1	7400	16200	26000	6000	1700	2400	11000	2700	34000	20000	2100	1880	1630/1540	14800
1,2-Dichlorobenzene	3	1	400 U	329	1000 U	100	100 U	18	54	9	58	100 U	8	12.0	20.2/20.4	83.0 J
1,3-Dichlorobenzene	3	1	400 U	232	1000 U	110	100 U	19	120	7	310	220	12	19.7	34.6/34.1	158
1,4-Dichlorobenzene	3	1	400 U	1640	2200	210	280	140	430	56	2500	1900	80	150	215/203	1270
1,2,3-Trichlorobenzene	5	1	400 U	50 U	1000 U	50 U	100 U	1 U	1 U	5 U	13 U	100 U	2 U	1.00 U	1.00 U/1.00 U	1.0 U
1,2,4-Trichlorobenzene	5	1	400 U	50 U	1000 U	50 U	100 U	1 U	1 U	5 U	13 U	100 U	2 U	1.00 U	1.87/2.03	1.0 U
Total Targeted Site Compounds			9000	21061	31800	7310	2290	2797	12705	3002	38268	22780	2290	2180	2044/1935	16703.61
Reported Values																
			Jul-02	Oct-02	Feb-03	May-03	Jul-03	Oct-03	Feb-04	May-04	Jul-04	Oct-04	Feb-05	Jun-05	Sep-05	Dec-05
Benzene	1	1	664	347	74.5	89.4	18.5	164	41.5	44.8	34.5 J	8.92/9.40	500 U	250 U	500 U	1.0 UJ
Toluene	5	1	1.00 U	100 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U/1.00U	500 U	250 U	500 U	1.0 UJ
Chlorobenzene	5	1	10600	14100	1880	3310	1270	9810	14600	3100	14600	1370/1330	13000	3100	7600	9.5 J
1,2-Dichlorobenzene	3	1	66	100 U	23.5	27.0	7.47	1.00 U	1.00 U	14.8	1.00 U	6.08/ 6.16	500 U	250 U	500 U	0.26 J
1,3-Dichlorobenzene	3	1	118	143	45.7	50.4	16.3	87.7	151	31.7	142 J	16.8/16.7	110 J	250 U	500 U	0.91 J
1,4-Dichlorobenzene	3	1	779	1200	285	363	119	680	1220	194	1110	112/107	990	280	620	1.7 J
1,2,3-Trichlorobenzene	5	1	1.00 U	100 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U	1.00 U/1.00U	500 U	250 U	500 U	1.0 UJ
1,2,4-Trichlorobenzene	5	1	1.00 U	100 U	1.75	1.72	1.00 U	3.24	1.00 U	1.70	1.00 U	1.00 U/1.08	500 U	250 U	500 U	1.0 UJ
Total Targeted Site Compounds			12227.3	15790	2310.45	3841.5	1431	10745	16013	3387	15886.5	1513/1469	14100	3380	8220	12.4

Notes:

J - Estimated

U - Not detected at the associated reporting limit

UJ - Not detected; associated reporting limit is estimated

µg/L - Micrograms per liter

* - New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)

8.5/9.0 - Results of investigative and duplicate sample

38 - Exceeds New York State Ambient Water Quality Standards and Water Guidance's Values (GA Water Class)

Historical Groundwater Chemistry Monitoring - Analytical Results
Durez Inlet Remediation Project
Groundwater Monitoring Program
Durez Inlet Site

MW-20I - Continued

Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	Reported Values													
			Feb-06	Jun-06	Sep-06	Dec-06	Mar-07	Jun-07	Aug-07	Nov-07	Mar-08	Jun-08	Sep-08	Jan-09	Feb-09	May-09
Benzene	1	1	500 U	500 U	250 U	15 U/20 U	500 U	170 U	50 U	330 U	12 U	250 U	250 UJ	200 U	11	11 J
Toluene	5	1	500 U	500 U	250 U	15 U/20 U	500 U	170 U	50 U	330 U	12 U	250 U	250 UJ	200 U	1.0 U	1.0 U
Chlorobenzene	5	1	8800	12000	3400	340 /320	8700	12000	3400	12000	1000	11000	11000 J	11000	11000	9600
1,2-Dichlorobenzene	3	1	500 U	500 U	250 U	15 U/20 U	500 U	170 U	50 U	330 U	12 U	250 UJ	250 UJ	200 U	5	1.0 U
1,3-Dichlorobenzene	3	1	60 J	97 J	250 U	1.7 J/20 U	500 U	83	23 J	80 J	7.4 J	74 J	62 J	76 J	82	86 J
1,4-Dichlorobenzene	3	1	620	940	270	20 /20	630	950	270	910	83	860 J	810 J	910	830	910
1,2,3-Trichlorobenzene	5	1	500 U	500 U	250 U	15 U/20 U	500 U	170 U	50 U	330 U	12 U	250 U	250 U	200 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	1	500 U	500 U	250 U	15 U/20 U	500 U	170 U	50 U	330 U	12 U	250 U	250 U	200 U	1.0 U	1.0 U
Total Targeted Site Compounds			9480	2237	3670	361.7/340	9330	13033	3693	12990	1090	11934	11872	11986	11928	10607
Reported Values																
			Aug-09	Nov-09	Feb-10	May-10	Aug-10	Nov-10	Mar-11	May-11	Aug-11	Nov-11	Feb-12	May-12	Aug-12	Nov-12
Benzene	1	1	15 J/14 J	10 J	200 U	500 U	500 U	500 U	500 U/400 U	120 U	250 U/200 U	250 U	200 U/200 U	80 U	100 U/130 U	100 U/16 J
Toluene	5	1	1.0 U/1.0 U	1.0 U	200 U	500 U	500 U	500 U	500 U/400 U	120 U	250 U/250 U	250 U	200 U/200 U	80 U	100 U/130 U	100 U/100 U
Chlorobenzene	5	1	9600/9700	8100	2100	8600	9500	8900	7700/8100	2800	4700/4400	4500	2400/3300	1800	2600/2700	2100/2400
1,2-Dichlorobenzene	3	1	5.2 J/5.9 J	5.4 J	200 U	500 U	500 U	500 U	500 U/400 U	120 U	250 U/200 U	250 U	200 U/200 U	80 U	100 U/130 U	100 U/100 U
1,3-Dichlorobenzene	3	1	68 J/68 J	62 J	200 U	500 U	500 U	500 U	500 U/400 U	19 J	29 J/41 J	32 J	30 J/334 J	25 J	36 J/34 J	36 J/25 J
1,4-Dichlorobenzene	3	1	820/840	720	150 J	670	630	540	590/670	320	510/470	530	540/390	320	460/460	410/410
1,2,3-Trichlorobenzene	5	1	1.0 U/1.0 U	1.0 U	200 U	500 U	500 U	500 U	500 U/400 U	120 U	250 U/200 U	250 U	200 U/200 U	80 U	100 U/130 U	100 U/100 U
1,2,4-Trichlorobenzene	5	1	1.0 U/1.0 U	1.0 U	200 U	500 U	500 U	500 U	500 U/400 U	120 U	250 U/200 U	250 U	200 U/200 U	80 U	100 U/130 U	100 U/100 U
Total Targeted Site Compounds			10508/10628	8897	2250	9270	10130	9440	8,290/8,770	3139	5239/4911	5062	2970/3724	2145	3096/3194	2546/2851
Reported Values																
			Feb-13	May-13	Aug-13	Nov-13	Feb-14	May-14	Aug-14	Nov-14	Feb-15	May-15	Aug-15	Nov-15	Feb-16	May-16
Benzene	1	1	130 U	130 U	21 J	17 J	200 U	27 J	26 J	25 J	26 J	37 J	23 J	35	32 J	8.1
Toluene	5	1	130 U	130 U	100 U	100 U	200 U	200 U	200 U	200 U	100 U	200 U	200 U	0.20 J	100 U	5.0 U
Chlorobenzene	5	1	2000	2000	2300	2300	200 U	2400	2700	2300	2700	2800	2400	2200	2400	960
1,2-Dichlorobenzene	3	1	130 U	130 U	100 U	100 U	200 U	200 U	200 U	200 U	100 U	200 U	200 U	4.8	100 U	5.1
1,3-Dichlorobenzene	3	1	28 J	31 J	25 J	22 J	430	30 J	200 U	27 J	36 J	28 J	29 J	27	25 J	33
1,4-Dichlorobenzene	3	1	390	340	380	370	200 U	360	420	350	480	390	390	300	330	340
1,2,3-Trichlorobenzene	5	1	130 U	130 U	100 U	100 U	2200	200 U	200 U	200 U	100 U	200 U	200 U	1.0 U	100 U	5.0 U
1,2,4-Trichlorobenzene	5	1	130 U	130 U	100 U	100 U	200 U	200 U	200 U	200 U	100 U	200 U	200 U	1.0 U	100 U	5.0 U
Total Targeted Site Compounds			2418	2371	2726	2709	2630	2817	3146	2702	3242	3255	2842	2567	2787.0	1346.0
Reported Values																
			Aug-16	Nov-16	Feb-17	May-17	Aug-17	Nov-17	Feb-18	May-18	Oct-18	Apr-19	Oct-19			
Benzene	1	1	29	29	25	23	25	19 J	20	16.3 J	15.0 J	12.8 J	12.8 J			
Toluene	5	1	10 U	20 U	20 U	20 U	25 U	25 U	20 U	20.0 U	20.0 U	20.0 U	25.0 U			
Chlorobenzene	5	1	2200	2600	2600	2600	2700	2700	3000	2590	2870	2830	2940			
1,2-Dichlorobenzene	3	1	4.8 J	20 U	20 U	20 U	25 U	25 U	20 U	20.0 U	20.0 U	20.0 U	25.0 U			
1,3-Dichlorobenzene	3	1	33	32	31	34	34	27	28	26.5	24.4	23.6	22.8 J			
1,4-Dichlorobenzene	3	1	420	420	370	440	420	410	410	362	388	388	398			
1,2,3-Trichlorobenzene	5	1	10 U	20 U	20 U	20 U	25 U	25 U	20 U	20.0 U	20.0 U	20.0 U	25.0 U			
1,2,4-Trichlorobenzene	5	1	10 U	20 U	20 U	20 U	25 U	25 U	20 U	20.0 U	20.0 U	20.0 U	25.0 U			
Total Targeted Site Compounds			2687	3081	3026	3097	3179	3156	3458	2995	3297	3254	3374			

Notes:

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Historical Groundwater Chemistry Monitoring - Analytical Results
Durez Inlet Remediation Project
Groundwater Monitoring Program
Durez Inlet Site

MW-221																
Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	Reported Values													
			Jul-01	Oct-01	Feb-02	May-02	Jul-02	Oct-02	Feb-03	May-03	Jul-03	Oct-03	Feb-04	May-04	Jul-04	Oct-04
Benzene	1	1	150	66.9	24.3	5.11/5.76	4.55	14.1/16.0	3.3	1.00 U	1.00 U/1.00 U	1.86	1.00 U	1.80 J/4.89 J	1.00 U	1.00 U
Toluene	5	1	1 U	1.00 U	1.00 U	1.00 U/1.00U	1.00 U	2.50 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U
Chlorobenzene	5	1	4500	308	583	459/566	485	1100 J/315 J	1170	68.4	40.3 /47.5	1290 J	455	1170 J /3190 J	243	53.2
1,2-Dichlorobenzene	3	1	47	3.00	1.58	1.00 U/1.00U	1.00 U	2.50 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U
1,3-Dichlorobenzene	3	1	23	1.81	3.56	2.98/3.62	3.01	7.86 J/2.71 J	11.6	1.15	1.00 U/1.00 U	6.88	2.72	9.49 J/28.8 J	1.91	1.00 U
1,4-Dichlorobenzene	3	1	130	14.7	28.2	27.2/31.6	23.8	69.7 J/19.8 J	99.3	4.41	2.48 /2.73	61.7 J	31.6	86.4 J /179 J	15.4	5.78
1,2,3-Trichlorobenzene	5	1	1 U	1.00 U	1.00 U	1.00 U/1.00U	1.00 U	2.50 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U
1,2,4-Trichlorobenzene	5	1	1 U	1.00 U	1.00 U	1.00 U/1.00U	1.00 U	2.50 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U	1.00 U/1.00 U	1.00 U	1.00 U
Total Targeted Site Compounds			4,850	394	641	494.29/606.98	516	1192/353.51	1,284	73.96	42.78/50.23	1,360	489	1268/3403	260	58.98
			Reported Values													
			Feb-05	Jun-05	Sep-05	Dec-05	Feb-06	Jun-06	Sep-06	Dec-06	Mar-07	Jun-07	Aug-07	Nov-07	Mar-08	Jun-08
Benzene	1	1	2.0 U/2.0 U	200 U/50 U	5.0 U	4.0 U	50 U	1.0 U	0.92 J	1.0 U	120 U	20 U/20 U	50 U	25 U	5.0 U/5.0 U	50 U
Toluene	5	1	2.0 U/2.0 U	201 U/50 U	5.0 U	4.0 U	50 U	1.0 U	1.0 U	1.0 U	120 U	20 U/20 U	50 U	25 U	5.0 U/5.0 U	50 U
Chlorobenzene	5	1	46/41	2400 J/1400 J	66	52	620	1.4	610	0.78 J	2500	940/1,300	4400	1400	330/330	3000
1,2-Dichlorobenzene	3	1	2.0 U/2.0 U	200 U/50 U	5.0 U	4.0 U	50 U	1.0 U	0.83 J	1.0 U	120 U	20 U/20 U	50 U	25 U	1.1 J/0.71 J	50 U
1,3-Dichlorobenzene	3	1	0.51 J/0.65 J	200 U/50 U	0.70 J	4.0 U	50 U	1.0 U	6.3	1.0 U	17 J	6.4/8.7	25 J	7.0 J	7.1/7.0	15 J
1,4-Dichlorobenzene	3	1	1.9 J/2.1	110 J/55 J	4.5 J	2.3 J	35 J	0.39 J	43 J	1.0 U	180	58/72	300	88	49/49	210
1,2,3-Trichlorobenzene	5	1	2.0 U/2.0 U	200 U/50 U	5.0 U	4.0 U	50 U	1.0 U	1.0 U	1.0 U	120 U	20 U/20 U	50 U	25 U	5.0 U/5.0 U	50 U
1,2,4-Trichlorobenzene	5	1	2.0 U/2.0 U	200 U/50 U	5.0 U	4.0 U	50 U	1.0 U	1.0 U	1.0 U	120 U	20 U/20 U	50 U	25 U	5.0 U/5.0 U	50 U
Total Targeted Site Compounds			48.41/43.75	2510/1455	71.2	54.3	655	1.79	661	0.78	2697	1004/1381	4725	1495	387.2/386.71	3225
			Reported Values													
			Sep-08	Jan-09	Feb-09	May-09	Aug-09	Nov-09	Feb-10	May-10	Aug-10	Nov-10	Mar-11	May-11	Aug-11	Nov-11
Benzene	1	1	50 U	100 U	1.0 U/1 U	2.9	3.5	2.5 J	250 U/250 U	120 U	50 U	250 U	30 U	100 U	100 U	100 U
Toluene	5	1	50 U	100 U	1.0 U/1 U	1.0 U	1.0 U	1.0 U	251 U/250 U	120 U	50 U	250 U	30U	100 U	75 U	100 U
Chlorobenzene	5	1	2000	2900	240/270	3000	2500	2800	3001/3300	1900	1000	2600	670	1900	1800	1900
1,2-Dichlorobenzene	3	1	50 U	100 U	1.0 U/1 U	1.0 U	1.0 U	3.1 J	250 U/250 U	120 U	50 U	250 U	30 U	100 U	100 U	100 U
1,3-Dichlorobenzene	3	1	9.9 J	100 U	5.6/5.4	25	18	20 J	250 U/250 U	120 U	7.2 J	250 U	4.8 J	100 U	100 U	100 U
1,4-Dichlorobenzene	3	1	120	200	71/70	270	200	240	250/260	130	85	170 J	75	84 J	68 J	81 J
1,2,3-Trichlorobenzene	5	1	50 U	100 U	1.0 U/1 U	1.0 U	1.0 U	1.0 U	250 U/250 U	120 U	50 U	250 U	30 U	100 U	100 U	100 U
1,2,4-Trichlorobenzene	5	1	50 U	100 U	1.0 U/1 U	1.0 U	1.0 U	1.0 U	250 U/250 U	120 U	50 U	250 U	30 U	100 U	100 U	100 U
Total Targeted Site Compounds			2129.9	3100	316.6/345.4	3298	2722	3046	3250/3560	2030	1092.2	2770	749.8	1984	1868	1981

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Historical Groundwater Chemistry Monitoring - Analytical Results
Durez Inlet Remediation Project
Groundwater Monitoring Program
Durez Inlet Site

MW-22I - Continued

Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	Reported Values													
			Feb-12	May-12	Aug-12	Nov-12	Feb-13	May-13	Aug-13	Nov-13	Feb-14	May-14	Aug-14	Nov-14	Feb-15	May-15
Benzene	1	1	14 J/15 J	6.7 J/50 U	17 J/19 J	20 J/100 U	100 U	40 U	23 J	20 J	200 U	32 J	38 J	36 J	34 J	40 J
Toluene	5	1	100 U/100 U	50 U/50 U	50 U/50 U	100 U/100 U	100 U	40 U	100 U	100 U	200 U	200 U	200 U	200 U	50 U	200 U
Chlorobenzene	5	1	1700/1700	950/950	1100/1200	1300/1200	1100	680	1800	1600	2100	1900	2000	2100	1900	2300
1,2-Dichlorobenzene	3	1	100 U/100 U	50 U/50 U	50 U/50 U	100 U/100 U	100 U	40 U	100 U	100 U	200 U	200 U	200 U	200 U	50 U	200 U
1,3-Dichlorobenzene	3	1	100 U/11 J	6.3 J/50 U	50 U/50 U	11 J/100 U	100 U	40 U	11 J	100 U	200 U	200 U	200 U	200 U	10 J	200 U
1,4-Dichlorobenzene	3	1	110/100	75/68	87/83	78 J/87 J	78 J	38 J	110	80 J	130 J	97 J	110 J	110 J	110	110 J
1,2,3-Trichlorobenzene	5	1	100 U/100 U	50 U/50 U	50 U/50 U	100 U/100 U	100 U	40 U	100 U	100 U	200 U	200 U	200 U	200 U	50 U	200 U
1,2,4-Trichlorobenzene	5	1	100 U/100 U	50 U/50 U	50 U/50 U	100 U/100 U	100 U	40 U	100 U	100 U	200 U	200 U	200 U	200 U	50 U	200 U
Total Targeted Site Compounds			1824/1826	1038/1018	1204/1302	1409/1287	1178	718	1944	1700	2230	2029	2148	2246	2054	2450

			Reported Values												
			Aug-15	Nov-15	Feb-16	May-16	Aug-16	Nov-16	Feb-17	May-17	Aug-17	Nov-17	Feb-18	May-18	Oct-18
Benzene	1	1	31 J	38	42 J	25	8.1	36	38	40	35	34	33	28.2	30.6
Toluene	5	1	100 U	0.16 J	100 U	10 U	5.0 U	5.0 U	20 U	20 U	20 U	20 U	20 U	20.0 U	20.0 U
Chlorobenzene	5	1	2100	1600	2,000	970	290	2100	2200	1900	2100	2100	2300	1950	2340
1,2-Dichlorobenzene	3	1	100 U	2.7	100 U	10 U	2.0 J	3.1 J	20 U	20 U	20 U	20 U	20 U	20.0 U	20.0 U
1,3-Dichlorobenzene	3	1	100 U	9.9	100 U	13	6.6	11	20 U	20 U	15 J	12 J	12 J	12.4 J	13.2 J
1,4-Dichlorobenzene	3	1	95 J	72 J	91 J	120	70	110	120	160	150	130	150	131	150
1,2,3-Trichlorobenzene	5	1	100 U	1.0 U	100 U	10 U	5.0 U	5.0 U	20 U	20 U	20 U	20 U	20 U	20.0 U	20.0 U
1,2,4-Trichlorobenzene	5	1	100 U	1.0 U	100 U	10 U	5.0 U	5.0 U	20 U	20 U	20 U	20 U	20 U	20.0 U	20.0 U
Total Targeted Site Compounds			2226	1723	2,133	1,128	377	2,260	2358	2100	2300	2276	2495	2122	2534

Reported Values

	Apr-19	Oct-19
Benzene	21.0 / 21.2	29.4
Toluene	20.0 U / 1.0 U	20.0 U
Chlorobenzene	1930 / 2040	2220
1,2-Dichlorobenzene	20.0 U / 1.53	20.0 U
1,3-Dichlorobenzene	10.6 J / 10.4	11.4 J
1,4-Dichlorobenzene	122 / 117	160
1,2,3-Trichlorobenzene	20.0 U / 1.0 U	20.0 U
1,2,4-Trichlorobenzene	20.0 U / 1.0 U	20.0 U
Total Targeted Site Compounds	2084 / 2189	2421

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Appendix C

Semiannual Inspection Field Sheets



Glenn Springs Holdings, Inc.

A subsidiary of Occidental Petroleum

SEMIANNUAL INSPECTION - DUREZ INLET

Site: Durez Inlet

Date: 4/12/19

Inspector: D. Tyrer

Weather: overcast 65°F SSW 10-15 mph

Inspection Item	Inspect For	
1. <u>Shoreline</u>	- signs of erosion	Y <input checked="" type="radio"/> N
2. <u>River Bank</u>	- signs of erosion	Y <input checked="" type="radio"/> N
3. <u>Aquatic Areas</u>	- signs of erosion	Y <input checked="" type="radio"/> N
4. <u>Cove Cap</u>	- signs of erosion/disturbance - exposed portion	Y <input checked="" type="radio"/> N
	- signs of erosion/disturbance - submerged portion	Y <input checked="" type="radio"/> N
5. <u>North Lobe</u>	- evidence of activity or penetration that could impact effectiveness of cutoff wall	Y <input checked="" type="radio"/> N

Comments/Remarks (Note: If repair/maintenance is recommended, describe its location/extent below)

Property owner has added a fair amount of fill material on the South Slope leading down to the Cove.

Evidence of 6" Ø boreholes being drilled right next to MW16I and about 25' NE of MW16I

Dave J Tyrer



Glenn Springs Holdings, Inc.

A subsidiary of Occidental Petroleum

SEMIANNUAL INSPECTION - DUREZ INLET

Site: Durez Inlet

Date: 10/21/2019

Inspector: D. Tyran

Weather: Mostly Sunny 46-66°F Winds ESE 5-7

Inspection Item	Inspect For	
1. <u>Shoreline</u>	- signs of erosion	Y / <u>N</u>
2. <u>River Bank</u>	- signs of erosion	Y / <u>N</u>
3. <u>Aquatic Areas</u>	- signs of erosion	Y / <u>N</u>
4. <u>Cove Cap</u>	- signs of erosion/disturbance - exposed portion	Y / <u>N</u>
	- signs of erosion/disturbance - submerged portion	Y / <u>N</u>
5. <u>North Lobe</u>	- evidence of activity or penetration that could impact effectiveness of cutoff wall	Y / <u>N</u>

Comments/Remarks (Note: If repair/maintenance is recommended, describe its location/extent below)

Dave J Tyran



about GHD

GHD is one of the world's leading professional services companies operating in the global markets of water, energy and resources, environment, property and buildings, and transportation. We provide engineering, environmental, and construction services to private and public sector clients.

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