

2020 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 data indicate that the cutoff wall is functioning as designed, and that the remedial program continues to meet its design objectives.

The 2020 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, with the exception of the concentration of chlorobenzene in the duplicate sample collected from MW-16I during the fall monitoring event, which slightly exceeded the groundwater standard. Concentrations of total Targeted Site Compounds (TSCs) were present in MW-20I (average 3,597 micrograms per liter [µg/L] in 2020 versus 3,314 µg/L in 2019) and in MW-22I (average 1,752 µg/L in 2020 versus 2,305 µg/L in 2019). 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 total TSC concentrations has been downward since 1996. Total 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. Historical concentrations of total 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 since 2016. 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 October 2019. The program will be implemented for three years and then the results will be evaluated. Year 1 is now complete. As of the fall 2020 groundwater monitoring event, concentrations of total TSCs in MW-22I have fluctuated since implementation of the passive diffusion remediation program, while concentrations of total TSCs in MW-16I and MW-20I remain relatively unchanged. Concentrations of total TSCs are expected to decrease during Years 2 and 3 of the program, as the length of time of exposure to the ORC increases. Continued semiannual monitoring will assist in evaluating the effects of the passive diffusion program.



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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 were outlined in the New York State Department of Environmental Conservation (NYSDEC)-approved "Inlet Monitoring Plan" (Rust Environment and Infrastructure, October1995). The "Inlet Monitoring Plan" was revised in 2019 (GDH, April 2019) and approved by NYSDEC in an email dated August 13, 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, 2020. The completed NYSDEC Institutional Controls and Engineering Controls (ICEC) Certification Form is included as Appendix A.

Other activities associated with the Site include ongoing evaluation of sediment in the Pettit Cove. This evaluation is not relevant to the operation, maintenance, and monitoring OM&M) activities for the Durez Inlet Site, and therefore, is not described in PRRs. 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 2020 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 monitoring well locations 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 2020. 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 2020 semiannual reports.

The analytical results were compared to New York State (NYS) Class GA groundwater standards (Class GA groundwater standards) 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 comparison is presented in Table 2.1. Historical groundwater results are provided in Appendix B.

3.1.1 Chemical Concentrations

Groundwater quality generally remained stable during the 26th year of monitoring. The analytical results for the sampling events conducted in 2020 from three of the five monitoring wells (MW-16I, MW-18I, and MW-19I) were below Class GA groundwater standards, with the exception of the concentration of chlorobenzene in the duplicate sample collected from MW-16I during the fall monitoring event, which slightly exceeded the Class GA groundwater standard.



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 groundwater quality in each of the five intermediate groundwater monitoring wells is discussed below. Graphs showing historical concentrations of total TSCs are presented on Figures 2.2 through 2.6. Only the total TSC concentrations for the parent samples are shown. Total TSC concentrations for both parent and duplicate samples are included in Appendix B.

MW-16I

The concentrations of total 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, total TSC 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 (μ g/L) in June 2006 to a low of non-detect (ND) at 1.0 μ g/L at various times between July 1995 and February 2009. Prior to June 2006, the highest concentration of total TSCs was observed in April 1996 at a concentration of 5.4 μ g/L.

Total concentrations of TSCs at monitoring well MW-16l in 2020 were 3.67 μ g/L during the spring monitoring event (4.02 μ g/L in the duplicate sample) and 3.39 μ g/L during the fall monitoring event (8.86 μ g/L in the duplicate sample). These concentrations were higher than the total TSC concentrations in 2019 (2.79 μ g/L during the spring monitoring event and 2.40 μ g/L during the fall monitoring event [2.28 μ g/L in the duplicate sample]).

With the exceptions of chlorobenzene during both of the 2020 events, and 1,4-dichlorobenzene in the duplicate sample collected during the fall 2020 event, the individual TSCs in MW-16I were either not detected or were detected at estimated concentrations below the reporting limits of 1.0 μ g/L. No TSC concentration exceeded the Class GA groundwater standards in 2020 with the exception of chlorobenzene in the duplicate sample collected during the fall 2020 event (7.04 J [estimated] μ g/L). (The chlorobenzene concentration in the parent sample was 2.79 J μ g/L. The Class GA groundwater standard is 5 μ g/L).

MW-18I

With the exception of the total concentrations of TSCs in August 2007 (estimated at 0.18 μ g/L [duplicate sample]), March 2008 (estimated at 0.17 μ g/L), and February 2013 (estimated at 0.20 μ g/L [duplicate sample]), 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 μ g/L in January 1996 to a low of ND at 1.0 μ g/L at various times



between July 1995 and the present. The concentrations of individual TSCs during 2020 were all ND at 1.0 μ g/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 μ g/L in December 2006 and 0.34 μ g/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 μ g/L in July 1995 to a low of ND at 1.0 μ g/L at various times between July 1995 and the present. Individual concentrations of TSCs at this location have not exceeded Class GA groundwater standards since July 1999. Individual concentrations of TSCs during 2020 were ND at 1.0 μ g/L.

MW-201

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 μ g/L in October 1997 to a low of 12.37 μ g/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 μ g/L, with very little fluctuation. Following the first ISCO injection event in April 2011, the total concentration of TSCs decreased to below 3,200 μ g/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 μ g/L during the May 2012 sampling event. From April 2012 to October 2020, the total concentration of TSCs has trended slightly upwards, likely due to rebound effects, but are overall stable.

Total concentrations of TSCs during 2020 were 3,372 μ g/L during the spring monitoring event and 3,822 μ g/L during the fall monitoring event. These concentrations were slightly higher than the total TSC concentrations in 2019 (3,254 μ g/L during the spring monitoring event and 3,374 μ g/L during the fall monitoring event).

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-221

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 μ g/L in July 2001 to a low of 0.8 μ g/L in December 2006. Following implementation of the passive diffusion remedial program in October 2019, both total and individual concentrations of TSCs have fluctuated. The total concentration gevent and 3,410 μ g/L during the fall monitoring event. This range of fluctuation is within the historical fluctuation range (see Figure 2.6) but may be attributable to the ongoing passive diffusion remedial program. Comparatively, the total concentrations of TSCs in MW-22I were 2,084 μ g/L during the



spring 2019 monitoring event (2,189 μ g/L in the duplicate sample) and 2,421 μ g/L during the fall 2019 monitoring event.

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 MW-22I were reduced after the 2011 and 2012 ISCO events to below 1,000 μ g/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. Total TSC concentrations in MW-20I and MW-22I during 2019 and 2020 are presented in the following tables.

Well Location	2019 Total TSC Concentrations (µg/L)						
	First Semiannual Period	Second Semiannual Period					
MW-201	3,254 μg/L	3,374 µg/L					
MW-22I	2,084 µg/L (duplicate-2,189 µg/L)	2,421 µg/L					

Well Location	2020 Total TSC Concentrations (µg/L)						
	First Semiannual Period	Second Semiannual Period					
MW-20I	3,372 μg/L	3,822 μg/L					
MW-22I	94.9 µg/L	3,410 μg/L					

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

As indicated in Section 3.1.1, graphs of the total concentrations of TSCs in monitoring wells MW-16l, MW-18l, MW-19l, MW-20l, and MW-22l since completion of Site remedy (April 1995) through the end of the year 2020 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 Class GA groundwater standards since July 1996, with the exception of the chlorobenzene concentrations during the June 2006 sampling event (16 µg/L) and October 2020 sampling event (7.04 µg/L J in the duplicate sample versus 2.79 J µg/L in the parent sample); and benzene concentrations during the August 2009, November 2013, May and November 2014, May 2015, February 2016, February 2017, and February 2018 sampling events. These benzene concentrations exceeding the Class GA groundwater standards of 1.0 µg/L have ranged from 1.1 to 1.3 µg/L. No TSC concentrations exceeded the Class GA groundwater standards in 2020 with the exception of chlorobenzene in the duplicate sample.



- 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.
- 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 since 2016.

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 (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 (ORC wells) for a period of 3 years. The first year of the program is now complete. As stated in the Work Plan, a summary letter describing the results of the program and presenting recommendations will be provided to the NYSDEC within 90 calendar days of conclusion of the 3-year implementation period.

The intent of the placement of the ORC socks was to introduce aerobic conditions to the formation, as chlorobenzene and benzene degrade readily in the presence of oxygen. The solid peroxides in the ORC socks release oxygen as they dissolve slowly over time. Installation of the first set of ORC socks occurred in October 2019, immediately following the semiannual sampling event.

In accordance with the schedule included in the Work Plan, in 2020, new ORC socks were installed in the ORC wells on February 24, May 6 (immediately following the semiannual sampling event), July 8, October 19 (immediately following the semiannual sampling event), and December 21. Seven feet of the socks were installed at the bottom of each well in order to span the 5-foot screened interval. The socks were removed from the wells on March 23 and September 18, 2020, in order to allow the effects of the ORC to abate prior to the spring and fall semiannual sampling events. The spent ORC socks were placed into a drum located at the Durez North Tonawanda facility and disposed of off-Site in accordance with applicable regulations.

Concentrations of total TSCs in MW-16I and MW-20I detected in 2020 did not decrease during the first year of the passive diffusion program. The program will be implemented for an additional two years. Concentrations of total TSCs in MW-22I have fluctuated since implementation of the program. Concentrations of total TSCs are expected to decrease during the second and third years of the program, as the length of time of exposure to the ORC increases.

Over the short term, installation of ORC socks can cause oxygen to be supersaturated in the areas of the wells in which they were installed. The ORC socks at the Site were removed approximately one month prior to the semiannual sampling events so that the effects of the socks could abate before sampling. Field water quality parameters measured during the spring and fall 2020



semiannual sampling events are presented in Table 2.2 and represent groundwater chemistry in the wells approximately one month following removal of the socks. These data show that the effects of the ORC socks had indeed abated prior to sampling. Conductivity, dissolved oxygen (DO), and oxidation-reduction potential (ORP) in the ORC wells were in the same ranges as the wells that did not have ORC socks (MW-18I and MW-19I, "non-ORC wells"). These data show that the VOC data obtained during the semiannual sampling events was representative of conditions in the groundwater in the areas of these wells and was not influenced by the ORC socks. DO may have been elevated in the ORC wells before removal of the socks; however, in the presence of degradable compounds such as benzene and chlorobenzenes, oxygen is used quickly by indigenous microbes. Therefore, it is not unexpected that oxygen would be reduced to background levels within one month of removing the socks. Beginning in 2021, field parameters identified in Table 2.2 will be measured at the time of ORC sock replacements and removals, in order to better understand the effects of the ORC socks while "active" in the ORC wells and to determine if any changes are needed during the second and third years of the program.

Continued semiannual monitoring will assist in evaluating the effects of the passive diffusion remedial activities.

3.2 Hydraulic Monitoring

Groundwater elevations were measured semiannually in the DNAPL extraction wells and the groundwater monitoring wells from January through December 2020.

During a hydraulic monitoring event, the elevation of the River is also measured for comparison to the groundwater elevations. A summary of the 2020 water elevations for the eight monitoring wells, five extraction wells, and the River is presented in Table 2.3.

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

A review of the hydraulic data measured during the 26 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, groundwater flow has been observed from the River into the North Lobe. Groundwater flow direction that fluctuates temporally is 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.

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 semiannual basis in May and October 2020. The frequency of DNAPL measurement was revised from monthly to semiannually as approved by the NYSDEC on April 4, 2019. Table 2.4 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 top of the sump in the bottom



of the extraction well. The accumulation rate of DNAPL in the extraction wells has slowed over time. Table 2.5 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.

DNAPL was not removed from the extraction wells in 2020. Table 2.5 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, from 2015 through 2018, or in 2020.

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 minor animal burrowing was observed beneath the concrete pad at MW-15I during the spring 2020 Site inspection. Four animal burrows were observed in the slope leading down from EW-1 and EW-2 to the Cove during the fall 2020 Site inspection. Repairs were not required.

4. Summary of 26th-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 26 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 of TSCs in MW-22I have remained relatively consistent with only slight increases since 2016. These concentrations remain lower than the pre-injection concentrations and have stabilized.

The 2020 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 Class GA groundwater standards, with the exception of the concentration of chlorobenzene detected in the duplicate sample collected from MW-16I during the fall monitoring event.

A passive diffusion remedial program was implemented at groundwater monitoring wells MW-16I, MW-20I, and MW-22I in October 2019. The program will be implemented for three years and then the results will be evaluated. The first year is now complete. As of the fall 2020 groundwater monitoring event, concentrations of total TSCs in MW-22I have fluctuated since implementation of the passive diffusion remediation program, while concentrations of total TSCs in MW-16I and MW-20I remain relatively unchanged. Concentrations of total TSCs are expected to decrease during



the second and third years of the program, as the length of time of exposure to the ORC increases. Continued semiannual monitoring and additional monitoring for field parameters at the time of ORC sock replacements and removals will assist in evaluating the effects of the passive diffusion remedial activities.

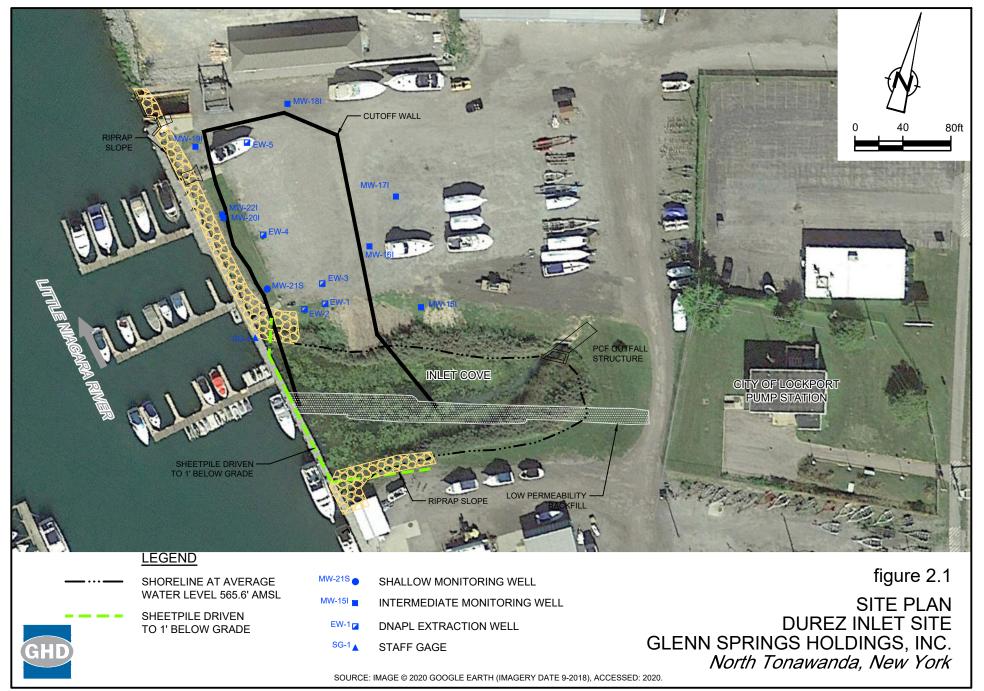
The hydraulic monitoring data show that the overall direction of groundwater flow at the Site is from east to west, across the upland area of the Inlet toward the River.

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.

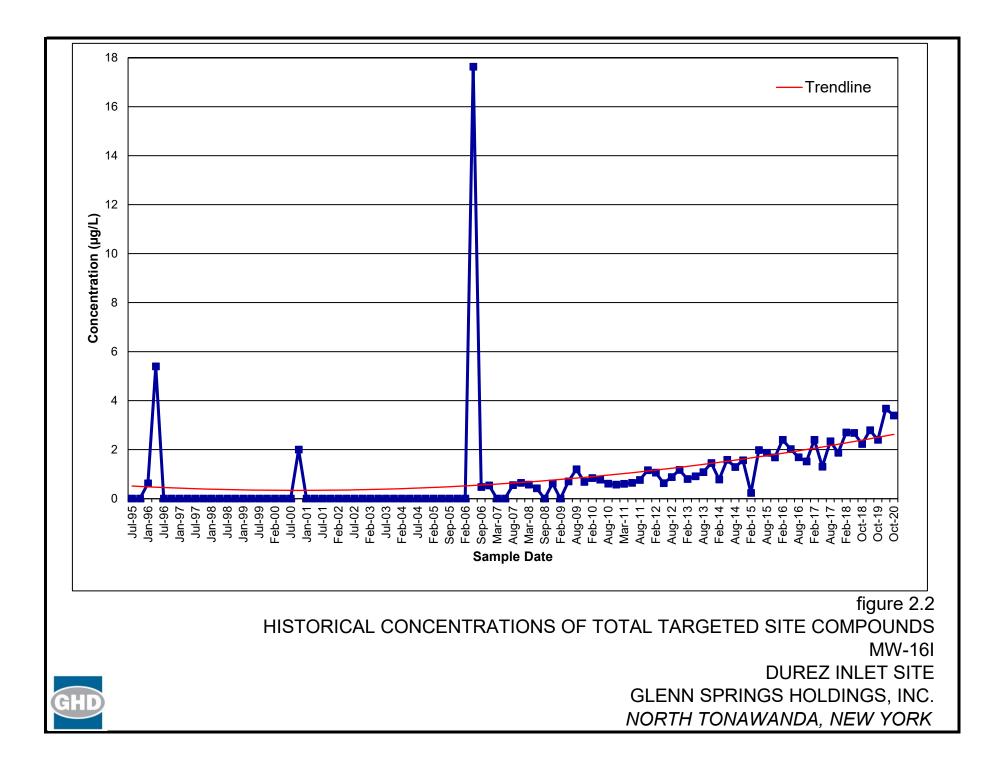
The long-term changes in groundwater quality will continue to be monitored and evaluated.

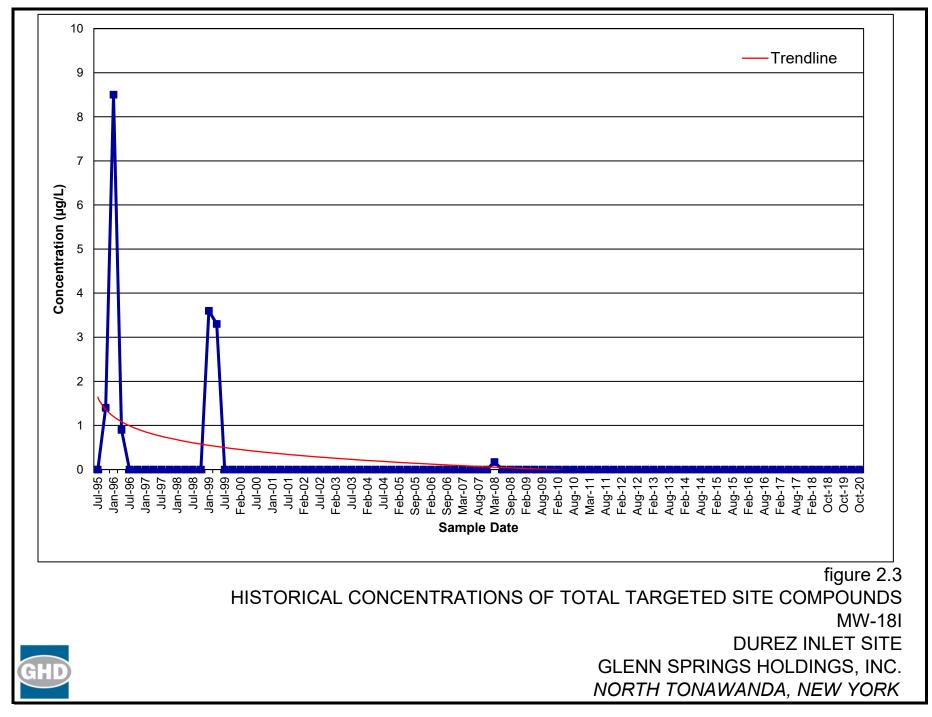
The Inlet monitoring program data for the Site demonstrates that the remedial program continues to meet its design objectives.

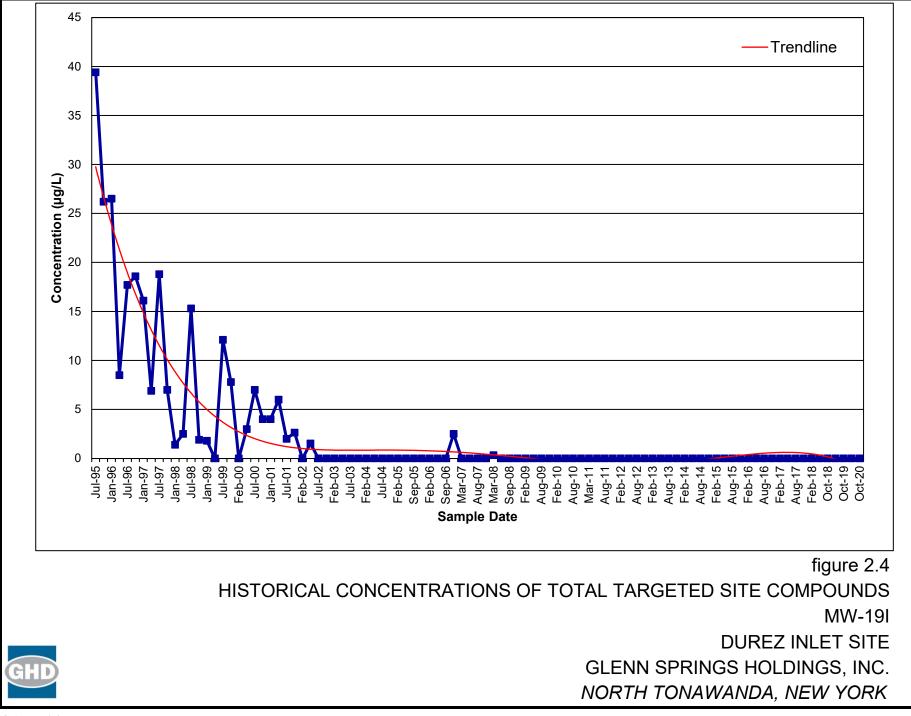


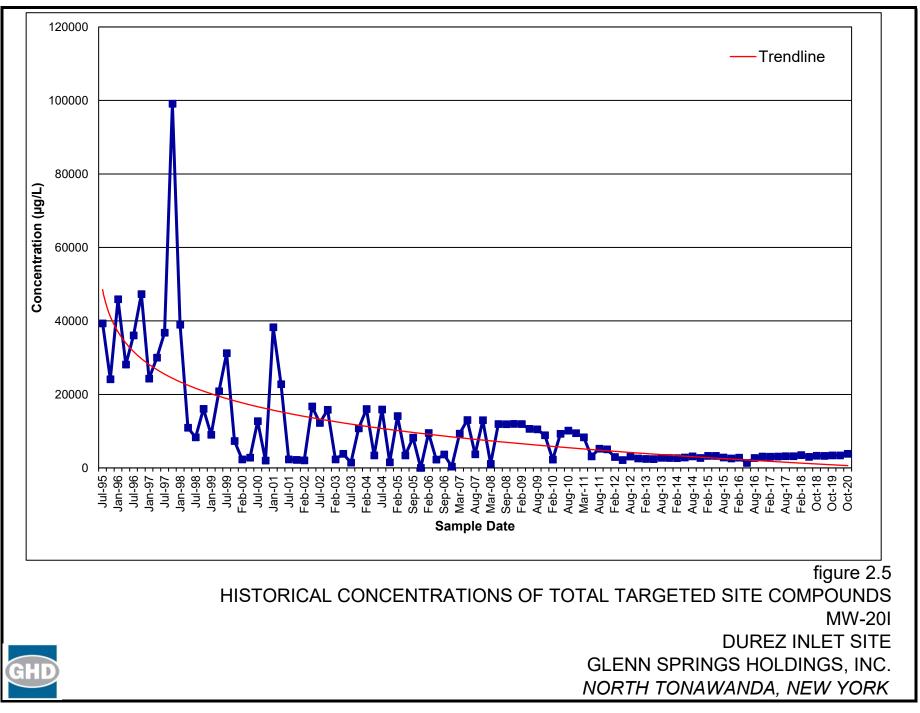


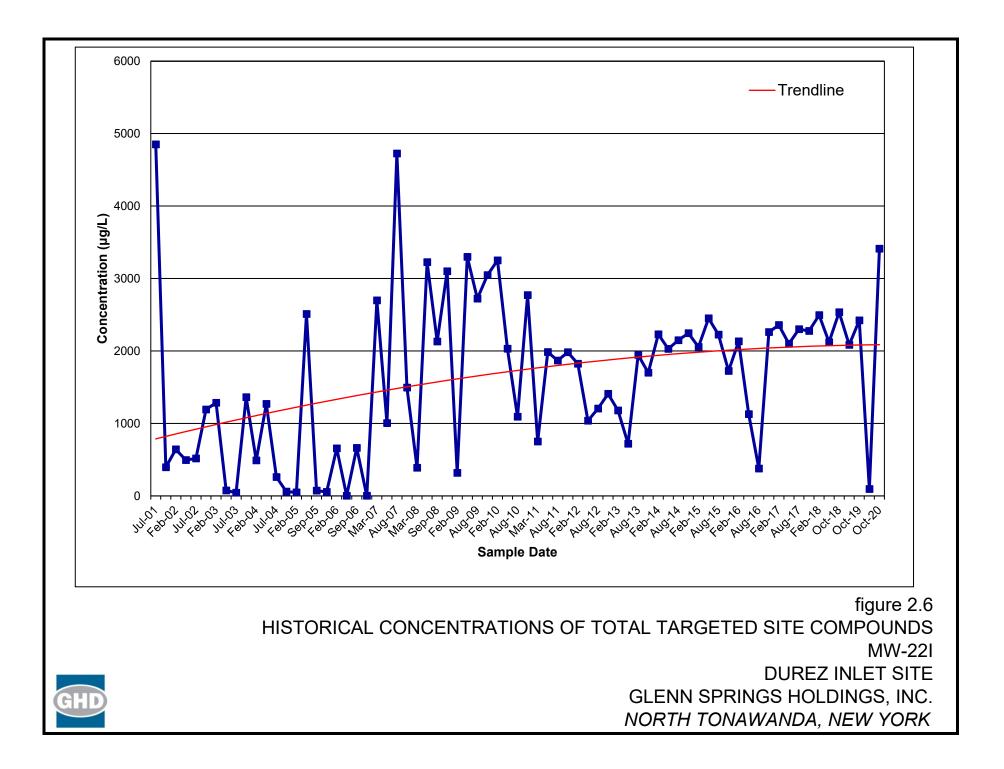
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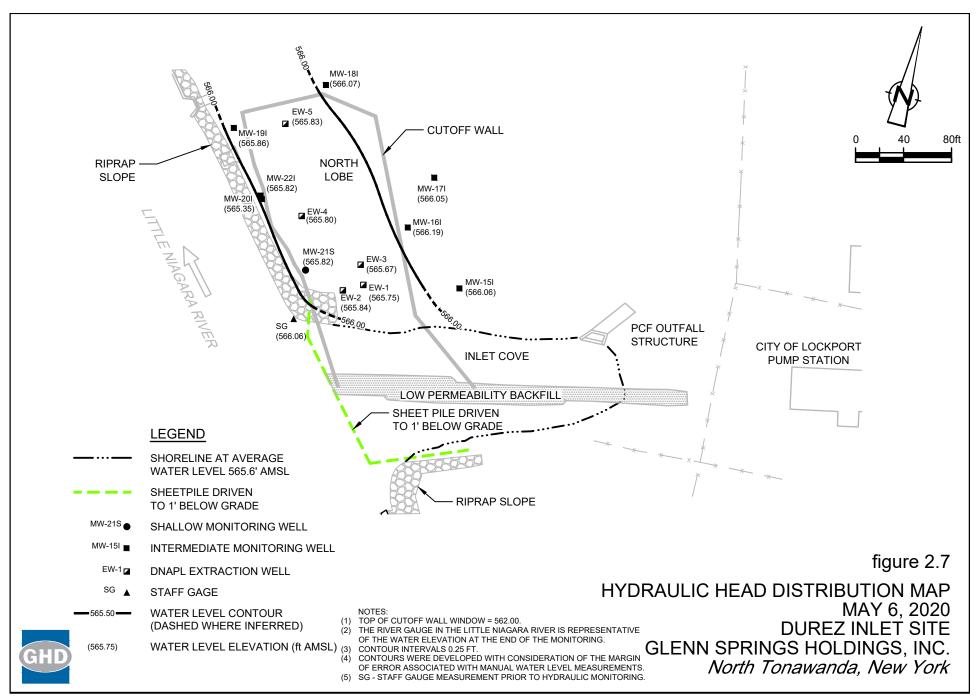




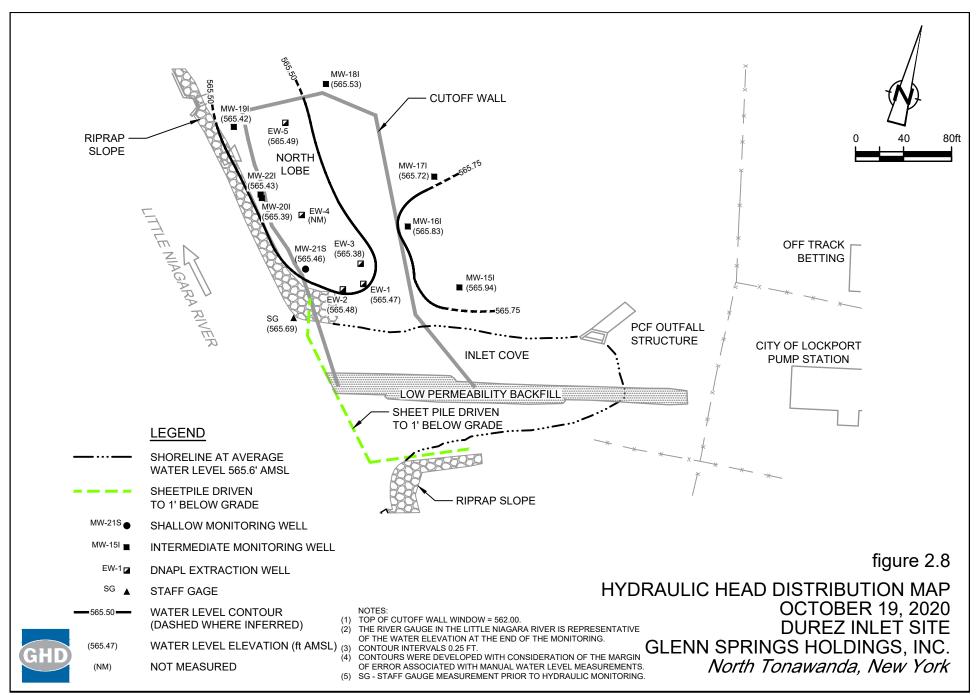








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2020 Groundwater Chemistry Monitoring - Analytical Results Durez Inlet Remediation Project Groundwater Monitoring Program Durez Inlet Site

	* Standard	Reporting	MW	-16	MW	-181
Compound/Parameter	Value (µg/L)	Limit (µg/L)	May 2020	Oct 2020	May 2020	Oct 2020
1,2,3-Trichlorobenzene	5	1	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	1	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
1,3-Dichlorobenzene	3	1	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 / 1.82	1.0 U	1.0 U
Benzene	1	1	0.866 J / 0.949 J	0.595 J / 1.0 U	1.0 U	1.0 U
Chlorobenzene	5	1	2.80 / 3.07	2.79 J / 7.04 J	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
Total Targeted Site Compounds			3.67 / 4.02	3.39 / 8.86	0.0	0.0

	* Standard	Reporting	MW	/-19	MW-20I	
Compound/Parameter	Value (µg/L)	Limit (µg/L)	May 2020	Oct 2020	May 2020	Oct 2020
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U	25.0 U	25.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U	25.0 U	25.0 U
1,2-Dichlorobenzene	3	1	1.0 U	1.0 U	25.0 U	25.0 U
1,3-Dichlorobenzene	3	1	1.0 U	1.0 U	23.5 J	22.9 J
1,4-Dichlorobenzene	3	1	1.0 U	1.0 U	421	441
Benzene	1	1	1.0 U	1.0 U	17.4	17.8 J
Chlorobenzene	5	1	1.0 U	1.0 U	2910	3340
Toluene	5	1	1.0 U	1.0 U	25.0 U	25.0 U
Total Targeted Site Compounds			0.0	0.0	3,372	3,822

	* Standard	Reporting	MW	/-22
Compound/Parameter	Value (µg/L)	Limit (µg/L)	May 2020	Oct 2020
1,2,3-Trichlorobenzene	5	1	1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	1	1.0 U	1.0 U
1,2-Dichlorobenzene	3	1	1.0 U	2.47
1,3-Dichlorobenzene	3	1	0.460 J	21.3
1,4-Dichlorobenzene	3	1	4.80	314
Benzene	1	1	0.824 J	72.6
Chlorobenzene	5	1	88.8	3,000
Toluene	5	1	1.0 U	1.0 U
Total Targeted Site Compounds			94.9	3,410

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)

2.80 / 3.07 - Results of investigative and duplicate sample

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

2020 Field Water Quality Parameters Durez Inlet Remediation Project Groundwater Monitoring Program Durez Inlet Site

	MW	/-16	MW	-181
Parameter	May 2020	Oct 2020	May 2020	Oct 2020
Temperature (°C)	12.7	14.3	11.6	14.0
Conductivity (mS/cm)	0.80	1.56	0.95	0.702
Turbidity (NTU)	9.27	26.4	16.7	51.3
Dissolved Oxygen (mg/L)	3.37	2.4	3.3	4.06
рН	8.59	7.81	7.40	10.36
ORP (mV)	-140.9	-122	-103.9	-44
	MW	-191	MW	-201
Parameter	May 2020	Oct 2020	May 2020	Oct 2020
Temperature (°C)	11.8	12.4	11.7	11.2
Conductivity (mS/cm)	1.09	1.08	2.28	2.42
Turbidity (NTU)	2.89	8.67	50.6	63.5
Dissolved Oxygen (mg/L)	2.98	4.57	4.85	1.14
рН	7.41	6.58	8.84	7.82
ORP (mV)	-50	0.3	-21.2	-120.6
	MW	-221		
Parameter	May 2020	Oct 2020		
Temperature (°C)	9.9	11.8		
Conductivity (mS/cm)	NM	2.45		
Turbidity (NTU)	62.6	77.5		
Dissolved Oxygen (mg/L)	5.41	1.74		
pH	11.45	8.27		
ORP (mV)	-74.8	-125.3		

Notes:

°C	- Degrees Celsius
mS/cm	- Millisiemens per centimeter
NTU	- Nephelometric Turbidity Unit
mg/L	- Milligrams per liter
mV	- Millivolts
NM	- Not measured

2020 Water Level Elevations Durez Inlet Remediation Project Groundwater Monitoring Program Durez Inlet Site

Well	Reference Point Elevation		
Number	(ft. AMSL)	05/06/20	10/19/20
MW-15I	569.79	566.06	565.94
MW-16I	573.31	566.19	565.83
MW-17I	574.41	566.05	565.72
MW-18I	573.51	566.07	565.53
MW-19I	572.29	565.86	565.42
MW-20I	572.35	565.35	565.39
MW-21S	572.02	565.82	565.46
MW-22I	572.31	565.82	565.43
EW-1	572.09	565.75	565.47
EW-2	571.89	565.84	565.48
EW-3	572.29	565.67	565.38
EW-4	572.69	565.80	NM
EW-5	573.06	565.83	565.49
SG ⁽¹⁾	567.66	566.06	565.69
SG ⁽²⁾	567.66	566.03	565.79

Notes:

Average elevation of the top of the cut-off wall is 562 feet AMSL					
- Feet Above Mean Sea Level					
- Not measured due to large boat parked on top of well					
- Staff Gauge at the River					
- River measurement at the start of monitoring					
- River measurement at the end of monitoring					

2020 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)
05/06/20	EW-1	572.09	537.26	538.70	-1.44	540.10	-2.84	537.10	0.16	0.24	NP
	EW-2	571.89	537.74	538.52	-0.78	539.40	-1.66	536.92	0.82	1.23	NP
	EW-3	572.29	537.55	538.10	-0.55	539.50	-1.95	536.50	1.05	1.57	NP
	EW-4	572.69	536.72	538.20	-1.48	539.50	-2.78	536.60	0.12	0.18	NP
	EW-5	573.06	538.49	539.20	-0.71	540.00	-1.51	537.60	0.89	1.33	NP
10/19/20	EW-1	572.09	537.16	538.70	-1.54	540.10	-2.94	537.10	0.06	0.09	NP
	EW-2	571.89	537.82	538.52	-0.70	539.40	-1.58	536.92	0.90	1.35	NP
	EW-3	572.29	537.67	538.10	-0.43	539.50	-1.83	536.50	1.17	1.75	NP
	EW-4	572.69	NM	538.20	NA	539.50	NA	536.60	NA	NA	NP
	EW-5	573.06	538.16	539.20	-1.04	540.00	-1.84	537.60	0.56	0.84	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
- NA Not applicable
- NM Not measured
- * Positive value indicates a requirement to remove DNAPL from well

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
Year Twenty-Six, January - December 2020	1135.1	0.0
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



GHD | 2020 Periodic Review Report | 007405 (58)

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

11/23/2020

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

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, 2021**. 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 Benjamin Mcpherson, the Project Manager, at 716-851-7220 or benjamin.mcpherson@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

ec: w/ enclosures

Benjamin Mcpherson, Project Manager Andrea Caprio, 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

The following parcel owner did not receive an ec:

Oar Marina, Llc - Parcel Owner Occidental Chemical Corporation - Parcel Owner National Grid - Parcel Owner

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 <u>cannot</u> 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 Site No. 932018	Box 1
Site Name Durez Div Occidental Chemical Corp.	
Site Address: Walck Road/River RoadZip Code: 14120City/Town: North TonawandaWalck Road: 67.4County: NiagaraSite Acreage: 73.300 72.23River Road: 4.7	
Reporting Period: December 31, 2019 to December 31, 2020	
	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, merg tax map amendment during this Reporting Period?	jed, or undergone a □
 Has there been any change of use at the site during this Report (see 6NYCRR 375-1.11(d))? 	ing Period
4. Have any federal, state, and/or local permits (e.g., building, disc for or at the property during this Reporting Period?	harge) been issued
If you answered YES to questions 2 thru 4, include docume that documentation has been previously submitted with this	ntation or evidence s certification form.
5. Is the site currently undergoing development?	
	Box 2
	YES NO
Is the current site use consistent with the use(s) listed below? Industrial	
7. Are all ICs in place and functioning as designed?	
IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, s DO NOT COMPLETE THE REST OF THIS FORM. Of	
A Corrective Measures Work Plan must be submitted along with th	is form to address these issues.
Signature of Owner, Remedial Party or Designated Representative	Date

Description of	Institutional Controls	
<u>Parcel</u> 181.20-2-9	<u>Owner</u> Oar Marina, LLC	Institutional Control
		Monitoring Plan O&M Plan
February 1989 Reco	tenance and Monitoring (OMM) is conducted rd of Decision and approved work plans. At the monitoring, NAPL removal from extraction well cover system.	he Inlet Site, site management include
Groundwater Quality PCJ (currently minor	y Monitoring; Durez Third Stipulation and PCJ change number 10, Rev.2, September 1999)	l and associated minor changes to the
DNAPL Removal; In 182.06-3-19	let Monitoring Plan, Rust 1995. GHD, 201 Occidental Chemical Corporation	19
		Monitoring Plan O&M Plan
	tenance and Monitoring (OMM) is conducted I rd of Decision and approved work plans. Occidental Chemical Corporation	by the RP in accordance with the Monitoring Plan O&M Plan
⁻ ebruary 1989 Reco I 82.06-3-20 Site Operation, Maint	rd of Decision and approved work plans.	Monitoring Plan O&M Plan
Eebruary 1989 Record 182.06-3-20 Site Operation, Maint Eebruary 1989 Record 182.06-3-21 Site Operation, Maint	rd of Decision and approved work plans. Occidental Chemical Corporation tenance and Monitoring (OMM) is conducted b rd of Decision and approved work plans.	Monitoring Plan O&M Plan by the RP in accordance with the 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 Maintenace 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. **Occidental Chemical Corporation** 182.32.-1-47 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. p/o 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. 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 Fencina/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, goundwater 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, goundwater 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. 182.32.-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. p/o 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.

 Periodic Review Report (PRR) Certification Statements I certify by checking "YES" below that: a) the Periodic Review report and all attachments were preparreviewed by, the party making the Engineering Control certificates b) to the best of my knowledge and belief, the work and conclusion are in accordance with the requirements of the site remedial prengineering practices; and the information presented is accurate and the information presented is accurate	ed under the direction of, and
 a) the Periodic Review report and all attachments were preparreviewed by, the party making the Engineering Control certificates b) to the best of my knowledge and belief, the work and conclusionare in accordance with the requirements of the site remedial pre-engineering practices; and the information presented is accurate at a following statements are true: (a) The Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last ap (b) nothing has occurred that would impair the ability of such Control (s) employed is the such and since the date that the control was put in-place. 	
 reviewed by, the party making the Engineering Control certification b) to the best of my knowledge and belief, the work and conclutare in accordance with the requirements of the site remedial prengineering practices; and the information presented is accurate a 2. For each Engineering control listed in Box 4, I certify by checking "YE following statements are true: (a) The Engineering Control(s) employed at this site is unchan since the date that the Control was put in-place, or was last ap (b) nothing has occurred that would impair the ability of such Control (s) 	
 are in accordance with the requirements of the site remedial prengineering practices; and the information presented is accurate a 2. For each Engineering control listed in Box 4, I certify by checking "YE following statements are true: (a) The Engineering Control(s) employed at this site is unchan since the date that the Control was put in-place, or was last ap (b) nothing has occurred that would impair the ability of such Control (s) 	
 For each Engineering control listed in Box 4, I certify by checking "YE following statements are true: (a) The Engineering Control(s) employed at this site is unchan since the date that the Control was put in-place, or was last ap (b) nothing has occurred that would impair the ability of such Control was put in the control was put in the ability of such Control was put in the co	ogram, and generally accepted
following statements are true: (a) The Engineering Control(s) employed at this site is unchan since the date that the Control was put in-place, or was last ap (b) nothing has occurred that would impair the ability of such 0	YES NO
following statements are true: (a) The Engineering Control(s) employed at this site is unchan since the date that the Control was put in-place, or was last ap (b) nothing has occurred that would impair the ability of such 0	
since the date that the Control was put in-place, or was last ap (b) nothing has occurred that would impair the ability of such C	ES" below that all of the
(b) nothing has occurred that would impair the ability of such C	
the environment,	Control, to protect public health and
(c) access to the site will continue to be provided to the Depar remedy, including access to evaluate the continued maintenan	
(d) nothing has occurred that would constitute a violation or fa Site Management Plan for this Control; and	ilure to comply with the
(e) if a financial assurance mechanism is required by the overs mechanism remains valid and sufficient for its intended purpos	sight document for the site, the established in the document.
	YES NO
IF THE ANSWER TO QUESTION 2 IS NO, sign and DO NOT COMPLETE THE REST OF THIS FORM. Oth	date below and erwise continue.
A Corrective Measures Work Plan must be submitted along with this t	orm to address these issues.
Signature of Owner, Remedial Party or Designated Representative	

	IC CERTIFICA SITE NO. 93	
		Box 6
I certify that all information		PRESENTATIVE SIGNATURE 2, and 3 are true. 1 understand that a false isdemeanor, pursuant to Section 210.45 of the
I JOSC PH A. R print name	beauch al The DLD	D CHANNEL TRAIL, MONTAGUE MT int business address 4943
am certifying as	OWNER	(Owner or Remedial Party)
for the Site named in the	Site Details Section of this form	m.
Lizan	nedial Party, or Designated Rep	2 - 22 - 202/

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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 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-1	161								
							Reported	Values								
Compound/Parameter	* Standard Value (μg/L)	Quantitation Limit (µg/L)	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

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 - C	ontinued								
							Reported	Values								
Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	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 1.2-Dichlorobenzene	5	1	1.0 U 1.0 U	16 1.0 U	1.0 U 1.0 U	1.0 U 1.0 U	1.0 U 1.0 U	1.0 U 1.0 U	1.0 U 1.0 U	1.0 U 1.0 U	0.23 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
1,3-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									
			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 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	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 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/1.0 U	1.0 U/1.0 U 1.0 U/1.0 U	1.0 U/1.0 U 1.0 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
1,2,3-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 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 / 1.0 U 1.0 U / 1.0 U	1.0 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	May-20	Oct-20	
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	0.866 J / 0.949 J	0.595 J / 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	1.00 U / 1.00 U	1.00 U / 1.00 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 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	2.80 / 3.07	2.79 J / 7.04 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	1.00 U / 1.00 U	1.00 U / 1.00 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 U	
1,3-Dichlorobenzene 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	1.00 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 U / 1.0 U	1.0 U / 1.0 U 1.0 U / 1.0 U	1.0 U / 1.0 U 1.0 U / 1.82	
1,4-Dichlorobenzene	5 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	1.0 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	1.00 U / 1.00 U	1.00 U / 1.00 U	1.0 U	1.0 U / 1.0 U	1.0 U / 1.0 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	3.67 / 4.02	3.39 / 8.86	

Notes:

J - Estimated

U

 Not detected at the associated reporting limit
 Not detected; associated reporting limit is estimated UJ

Hor detected, associated reporting infinities 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 -1	81								
							Reported	Values								
Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	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				
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				
1,2-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
	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	10	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														
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	10	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	10	1 U/1 U	2 U	1 U/1 U 1 U/1 U	1.00 U/1.00 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	10	1 U/1 U	2 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	10	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									
			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
			0.0,0.0	0.0	0.0,010	0.0	0.0	0.0,010	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 - Co	ontinued								
							Reported '	Values								
Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	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
				No. 00	F. k. 40	M 40	Reported		No. 44	N	A	New 44	E.k. 40	Mar. 40	1	Nex 10
			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 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 1.0 U	1.0 UJ 1.0 UJ	1.0 U 1.0 U
Total Targeted Site Compounds	5	1	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	0.0	0.0	0.0	0.0	0.0	0.0	0.0
			Eab 12	May 12	Aug 12	Nov-13	Reported		Aug 44	New 44	Feb-15	May 15	Aug 45	Nov-15	Feb-16	May 46
			Feb-13	May-13	Aug-13	NOV-13	Feb-14	May-14	Aug-14	Nov-14	FeD-15	May-15	Aug-15	NOV-15	FeD-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 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 Total Targeted Site Compounds	5	1	1.0 U/1.0 U 0/0.20	<u>1.0 U</u> 0.0	<u>1.0 U/1.0 U</u> 0.0/0.0	<u>1.0 U</u> 0.0	1.0 U /1.0 U 0/0	1.0 U /1.0 U 0/0	1.0 U	1.0 U 0	1.0 U 0	1.0 U 0	<u>1.0 U / 1.0 U</u> 0 / 0	<u>1.0 U / 1.0 U</u> 0 / 0	<u>1.0 U / 1.0 U</u> 0.0	<u>1.0 U / 1.0 U</u> 0.0
Total Targeted Site Compounds			0/0.20	0.0	0.0/0.0	0.0			0	0	0	0	070	070	0.0	0.0
			Aug-16	Nov-16	Feb-17	May-17	Reported V Aug-17	Values Nov-17	Feb-18	May-18	Oct-18	Apr-19	Oct-19	May-20	Oct-20	_
			Aug-16	NOV-16	Feb-17	way-17	Aug-17	NOV-17	FeD-18	way-18	001-18	Apr-19	Oct-19	May-20	Oct-20	
Benzene	1	1	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	1.0 U	1.0 U				
Toluene	5	1	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	1.0 U	1.0 U				
Chlorobenzene	5	1	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	1.0 U	1.0 U				
1,2-Dichlorobenzene	3	1	1.0 U / 1.0 U	1.0 U	1.0 U	1.0 U	1.00 U	1.00 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	1.00 U	1.00 U	1.0 U	1.0 U	1.0 U	1.0 U				
1,4-Dichlorobenzene	•	1	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	1.0 U	1.0 U				
1,2,3-Trichlorobenzene 1,2,4-Trichlorobenzene	5 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	1.00 U 1.00 U	1.00 U 1.00 U	1.0 U 1.0 U	1.0 U 1.0 U	1.0 U 1.0 U	1.0 U 1.0 U	
Total Targeted Site Compounds	Э	Í	0/0	0/0	0/0	0/0	1.0 0	1.0 0	1.0 0	0	0	0	0	0.0	0.0	
Forder Pargelou one compounds			070	070	010	070	0	0	0	0	0	0	0	0.0	0.0	

Notes:

J - Estimated

 Not detected at the associated reporting limit
 Not detected; associated reporting limit is estimated U

UJ

µg/L ∗ - Micrograms per liter

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-1	91								
							Reported	/alues								
	* Standard	Quantitation	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
Compound/Parameter	Value (µg/L)	Limit (µg/L)														
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						
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				
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	0.59 J	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				
1,2,4-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				
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	/alues								
			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 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 U	1 U	1 Ū	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	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 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 U	1 U	10	10	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	/alues								
			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	1.0 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	1.0 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	1.0 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	1.0 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	1.0 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	1.0 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	1.0 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	1.0 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
 Not detected; associated reporting limit is estimated UJ

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

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

							MW-19I - Co	ntinued								
							Reported V	alues								
Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	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 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 1.0 U	1.0 U/1.0 U 1.0 U/1.0 U	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	5	1	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
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
			A	Nava 00	F . b .40	Mar. 40	Reported V		No. 44	Marcala	Aug. 44	Neve 44	5.h.40	M 40	A	Na. 40
			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 1.2.3-Trichlorobenzene	3 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	1.0 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	1.0 U/1.0 UJ 1.0 U/1.0 U	1.0 U/1.0 U 1.0 U/1.0 U
Total Targeted Site Compounds	5	I	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	0.0/0.0			0.0	0.0	0.0	0.0	0.0	0,0	0/0	0,0
			Feb-13	May-13	Aug-13	Nov-13	Reported V Feb-14	alues 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				
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				
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				
1,2-Dichlorobenzene 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 UJ	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 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	1.0 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				
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 V	alues								
			Aug-16	Nov-16	Feb-17	May-17	Aug-17	Nov-17	Feb-18	May-18	Oct-18	Apr-19	Oct-19	May-20	Oct-20	-
Benzene	1	1	1.0 U	1.0 U	1.0 U	1.00 U	1.00 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	1.00 U	1.00 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	1.00 U	1.00 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	1.00 U	1.00 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	1.00 U	1.00 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	1.00 U	1.00 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	1.00 U	1.00 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	1.00 U	1.00 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	

Notes:

J - Estimated

U

Not detected at the associated reporting limit
Not detected; associated reporting limit is estimated
Micrograms per liter UJ

µg/L ∗

* - 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

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

							MW-2	201								
							Reported	Values								
Compound/Parameter	* Standard Value (μg/L)	Quantitation Limit (µg/L)	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
 Not detected; associated reporting limit is estimated UJ

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

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

							MW-20I - C	Continued								
							Reported	l Values								
	* Standard	Quantitation	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
Compound/Parameter	Value (µg/L)	Limit (µg/L)														
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 5	1	500 U	500 U	250 U	15 U/20 U	500 U	170 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 Total Targeted Site Compounds	5	1	500 U 9480	500 U 2237	250 U 3670	15 U/20 U 361.7/340	500 U 9330	13033	50 U 3693	330 U 12990	12 U 1090	250 U 11934	250 U 11872	200 U 11986	1.0 U 11928	1.0 U 10607
Total Targeted Site Compounds			3400	2231	3070	501.7/540			3093	12330	1050	11904	11072	11900	11920	10007
			Aug 00	Nov-09	Feb-10	May-10	Reported	I Values Nov-10	Mar-11	Mov 11	Aug 11	Nov-11	Feb-12	May-12	Aug-12	Nov-12
			Aug-09	NOV-09	Feb-10	May-10	Aug-10	NOV-TU	war-11	May-11	Aug-11	NOV-11	Feb-12	way-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 9440	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	l 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 2630	200 U 2817	200 U 3146	200 U	100 U 3242	200 U	200 U 2842	1.0 U 2567	100 U	5.0 U 1346.0
Total Targeted Site Compounds			2418	2371	2726	2709	2030	2017	5140	2702	3242	3255	2042	2507	2787.0	1340.0
							Reported				0.140					_
			Aug-16	Nov-16	Feb-17	May-17	Aug-17	Nov-17	Feb-18	May-18	Oct-18	Apr-19	Oct-19	May-20	Oct-20	
Benzene	1	1	29	29	25	23	25	19 J	20	16.3 J	15.0 J	12.8 J	12.8 J	17.4	17.8 J	1
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	25.0 U	25.0 U	
Chlorobenzene	5	1	2200	2600	2600	2600	2700	2700	3000	2590	2870	2830	2940	2910	3340	
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	25.0 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	23.5 J	22.9 J	
1,4-Dichlorobenzene	3	1	420	420	370	440	420	410	410	362	388	388	398	421	441	1
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	25.0 U	25.0 U	
1,2,4-Trichlorobenzene	5	1	10 U 2687	20 U 3081	20 U 3026	20 U	25 U	25 U 3156	20 U 3458	20.0 U 2995	20.0 U	20.0 U	25.0 U 3374	25.0 U	25.0 U 3822	
Total Targeted Site Compounds			2007	3081	3020	3097	3179	3150	3438	2990	3297	3254	33/4	3372	3822	

Notes:

J - Estimated

U

 Not detected at the associated reporting limit
 Not detected; associated reporting limit is estimated UJ

- Micrograms per liter µg/L *

* - 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

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

							MW-	221								
							Reported	Values								
Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	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

Notes:

J - Estimated

U

 Not detected at the associated reporting limit
 Not detected; associated reporting limit is estimated ŪJ

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-22I - Co	ontinued								
Reported Values																
Compound/Parameter	* Standard Value (µg/L)	Quantitation Limit (µg/L)	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	Apr-19
Benzene	1	1	31 J	38	42 J	25	8.1	36	38	40	35	34	33	28.2	30.6	21.0 / 21.2
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	20.0 U / 1.0 U
Chlorobenzene	5	1	2100	1600	2,000	970	290	2100	2200	1900	2100	2100	2300	1950	2340	1930 / 2040
1,2-Dichlorobenzene	3	1	100 U	2.7	100 U	10 U	2.0 J	3.1 J	20 U	20.0 U	20.0 U	20.0 U / 1.53				
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	10.6 J / 10.4
1,4-Dichlorobenzene	3	1	95 J	72 J	91 J	120	70	110	120	160	150	130	150	131	150	122 / 117
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	20.0 U / 1.0 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	20.0 U / 1.0 U
Total Targeted Site Compounds			2226	1723	2,133	1,128	377	2,260	2358	2100	2300	2276	2495	2122	2534	2084 / 2189
Reported Values																
			Oct-19	May-20	Oct-20											
Benzene			29.4	0.824 J	72.6											
Toluene			20.0 U	1.0 U	1.0 U											
Chlorobenzene			2220	88.8	3000											
1,2-Dichlorobenzene			20.0 U	1.0 U	2.47											
1,3-Dichlorobenzene			11.4 J	0.460 J	21.3											
1,4-Dichlorobenzene			160	4.80	314											
1,2,3-Trichlorobenzene			20.0 U	1.0 U	1.0 U											
1,2,4-Trichlorobenzene			20.0 U	1.0 U	1.0 U											
Total Targeted Site Compounds			2421	94.9	3410											

Notes:

J - Estimated

U

 Not detected at the associated reporting limit
 Not detected; associated reporting limit is estimated UJ

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

Appendix C 2020 Semiannual Inspection Field Sheets

		Same Arts III	prings Holding of Occidental Petroleum	s, inc.		
		SEMIANNUAL II	NSPECTION - DUREZ INI	ET		
	Site: Date: Inspector: Inspection I	Durez Inlet <u>S(L) 2020</u> <u>S</u> GARDNER tem Inspect For	- Weather:	CLOUDY 40	» F Winds N	E . 5-1019PH
1.	Shoreline	- signs of erosion		Y /N		
2.	<u>River Bank</u>	- signs of erosion		Y /Ŋ		
3.	Aquatic Are	eas - signs of erosion		Y / N		
4.	<u>Cove Cap</u>	 signs of erosion/disturba signs of erosion/disturba 		Y/10 Y/10		
5.	North Lobe	- evidence of activity or pe	enetration that could	YN		

5. North Lobe

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

impact effectiveness of cutoff wall

4" HOLE UNDER MH-IST FROM BURROWING ANIMAL, UNDER CONCRETE RAD Sham Hardvir

		INGS HOIDINGS, INC. Occidental Petroleum								
SEMIANNUAL INSPECTION - DUREZ INLET										
Date: <u>10</u>	rez Inlet >/19/20 Tyran S-Gardner	Weather: Steady light rain, 96°F Winds SE 0-5 mph								
Inspection Item	Inspect For									
1. <u>Shoreline</u>	- signs of erosion	Y /N								
2. <u>River Bank</u>	- signs of erosion	YN								
3. <u>Aquatic Areas</u>	- signs of erosion	YN								
4. <u>Cove Cap</u>	- signs of erosion/disturbance	- exposed portion								

- signs of erosion/disturbance - submerged portion

- evidence of activity or penetration that could

impact effectiveness of cutoff wall

5. North Lobe

Y/

YN

		Note: If repair/m						
Notice	ed -4	down	burro	ws (po	53-61y-	woodce	hucks) in
Slope	leading	down	from	EW-10	and Et	1-2 to	the	COVe.
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			· · ·					
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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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