

2025 Site Management Periodic Review Report – Durez North Tonawanda

NYSDEC Site No. 932018

Durez North Tonawanda Interceptor Trench

700 Walck Road

North Tonawanda, New York

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EXECUTIVE SUMMARY

This report describes the Operation, Maintenance, and Monitoring (OM&M) activities for calendar year 2025 at the former Durez North Tonawanda Facility Interceptor Trench (IT) (Site) located at 700 Walck Road in North Tonawanda, New York. Management of the Site is performed by Glenn Springs Holdings, Inc. (GSH), a subsidiary of Occidental Petroleum Corporation (OPC) on behalf of Environmental Resource Holdings LLC (ERH) (successor to Occidental Chemical Corporation and a subsidiary of OPC). Since July 1, 1998, pursuant to the individual Site documents and subsequent approved modifications, GSH has conducted routine monitoring and maintenance programs at the Site. On August 1, 2022, B&B Engineers and Geologists of New York, P.C. (B&B), an affiliate of Geosyntec Consultants, Inc. (Geosyntec), was retained by GSH to perform operation, maintenance, monitoring, and reporting activities for the Site.

Approximately 50.7 million gallons of groundwater were collected from the IT, treated, and discharged in calendar year 2025. Water is discharged to the nearby City of North Tonawanda stormwater sewer under the authority of a New York State Department of Environmental Conservation State Pollutant Discharge Elimination System Permit (SPDES) (Permit No. NY0001198). The volume of water treated and discharged was reported in the monthly SPDES Discharge Monitoring Reports (DMRs) submitted to the New York State Department of Environmental Conservation (NYSDEC). The 2025 semiannual groundwater contours and measured water levels at the piezometer clusters indicate that an overall inward gradient to the IT is being maintained. Therefore, the purpose and primary objective of the IT are being met.

Groundwater samples are collected annually from the Site for chemical analysis. The analytical results from the April 2025 groundwater monitoring event indicate that volatile organic compounds (VOCs) and total recoverable phenolics concentrations were non-detect at the respective reporting limit. The laboratory results are consistent with Site historical data.

Per comment No. 1 in the NYSDEC's response letter for the 2022 Periodic Review Report (PRR) for Durez NT/Inlet Site, GSH agreed to pump piezometer T-2A to dry (i.e., pump all groundwater and NAPL to the extent possible out of T-2A) to evaluate if the formation still contains mobile non-aqueous phase liquid (NAPL). On September 3, 2025, T-2A was pumped dry and subsequently checked for the presence of NAPL. No NAPL was observed to be present which would indicate there is no mobile NAPL. Additionally, during the semiannual hydraulic monitoring, select wells were monitored in the vicinity of T-2A to demonstrate that an inward gradient was present in the area of T-2A. The water level rounds were completed in March and September 2025 and demonstrated that there is an inward gradient in the vicinity of T-2A. This is important since, should there still be mobile NAPL present in the vicinity of T-2A, it will be captured by the IT due to the inward groundwater gradient.

The groundwater monitoring program is conducted to collect the hydraulic and groundwater chemical data necessary to evaluate both the effectiveness of the IT and long-term trends in groundwater chemistry in select monitoring wells. The hydraulic data collected in calendar year

2025 indicates that the IT is functioning effectively, and the chemical groundwater data collected demonstrates that the IT continues to prevent off-Site migration of impacted groundwater.

In addition to completing the routine operation, maintenance and monitoring for the groundwater collection system and the treatment system, GSH also completed a supplemental groundwater monitoring event per the NYSDEC's request outlined in their Periodic Review Report (PRR) Response Letter dated April 19, 2024. Comment 8 in the letter stated,

8. ***“Overall, Interior Groundwater Quality: it appears that groundwater quality across the interior of the site was last sampled in the late 1980s or early 1990s. NYSDEC is requesting that existing monitoring wells inside the groundwater interceptor trench be sampled for targeted site compounds to provide an update on groundwater conditions below the site. This information is being requested due to recent operational issues and to assess how the long-time operation of the interceptor trench as affected site groundwater.”***

A workplan was submitted to the NYSDEC in response to the request and accepted August 1, 2024. The sampling was scheduled to be completed during the “wet” season in early spring 2025 when soil conditions are considered to be at the greatest saturation and groundwater levels at their highest. The sampling was completed March 12 through 15, 2025. A summary and discussion of the additional groundwater data is presented in **Appendix G**. Overall, the results were consistent with historical information confirming no change to groundwater impacts for the site (i.e., they remain consistent with initial investigation findings).

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1. INTRODUCTION

This report describes the Operation, Maintenance, and Monitoring (OM&M) activities for calendar year 2025 at the former Durez North Tonawanda Facility Interceptor Trench (IT) (Site) (**Figure 1.1**) located at 700 Walck Road in North Tonawanda, New York. Management of the Site has been performed by Glenn Springs Holdings, Inc. (GSH) since July 1, 1998, a subsidiary of Occidental Petroleum Corporation (OPC), on behalf of Environmental Resource Holdings LLC (ERH) (successor to Occidental Chemical Corporation and a subsidiary of OPC). On August 1, 2022, B&B Engineers and Geologists of New York, P.C. (B&B), an affiliate of Geosyntec Consultants, Inc. (Geosyntec), was retained by GSH to perform operation, maintenance, monitoring, and reporting activities for the Site.

This report was prepared on behalf of GSH and covers operation, maintenance, and monitoring activities for calendar year 2025. The completed 2025 NYSDEC Institutional and Engineering Controls Certification Form is included as **Appendix A**.

This report describes the monitoring and maintenance activities conducted and presents the data collected at the Site between January 1, 2025 and December 31, 2025.

2. DUREZ NORTH TONAWANDA FACILITY/IT SITE

Pursuant to Appendix B of the *Durez Partial Consent Judgment* (PCJ), groundwater monitoring at the former OCC Durez Division North Tonawanda Plant is being conducted as part of the Site-wide groundwater remediation program. This monitoring began on October 2, 1989, prior to the installation of a groundwater remediation system, the principal component of which is a perimeter groundwater interceptor trench. This report presents data obtained during the 2025 calendar year.

Sitewide semiannual hydraulic monitoring for the period covered by this annual report was conducted in March and September 2025. The annual groundwater quality monitoring was conducted April 3, 2025. All work conducted during 2025 was performed in accordance with the protocols and requirements in Appendix B of the PCJ "*Monitoring, Operations, and Maintenance Plan*" (1989) and subsequent *Minor Modification #10, Rev. 2 "Minor Change to Appendix B "Monitoring, Operations, and Maintenance Plan"* (September 1999).

This report summarizes the purpose and scope of the current groundwater monitoring program, discusses the hydraulic effectiveness of the IT, and provides a summary of groundwater chemistry monitoring results. The completed NYSDEC 2025 *Institutional and Engineering Controls Certification Form* is included in **Appendix A**. This report also includes a summary report of the activities completed, the laboratory data, and a brief evaluation of the data for the supplemental groundwater monitoring event for monitoring wells located inside the IT.

2.1 Site Monitoring

2.1.1 Purpose

The purpose and primary design objectives of the IT are:

- to collect and capture groundwater located inside the IT that could otherwise migrate off the Site, and
- to collect and capture groundwater located outside the Site by creating an inward hydraulic gradient toward the IT (lower groundwater elevation in the trench than in the piezometers outside the trench)

The IT groundwater monitoring program is conducted to collect the hydraulic and groundwater quality data necessary to evaluate the effectiveness of the IT and the long-term trends in groundwater quality in selected monitoring wells.

2.1.2 Scope

The hydraulic monitoring program consists of semiannual measurements of water levels in 48 monitoring wells located on and off the Site and semiannual measurement of water levels in 36 on-Site piezometers. The piezometer arrays consist of three wells (A, B, and C): the first well (A) is located on the outside perimeter of the IT; the second well (B) is located in the IT

bedding material; and the third well (C) is located in the interior (Plant side) of the IT for a total of twelve, 3-well piezometers arrays. The piezometer arrays are referred to as the "T-Series" piezometers and have been monitored since their installation in August 1990. The monitoring well and piezometer locations are presented on **Figure 1.2**.

The groundwater quality monitoring program at the Site consists of annual sampling and chemical analyses of groundwater collected from seven (7) monitoring wells located off and on the Site. The selection and utilization of these wells are consistent with the requirements specified in the PCJ or from approved minor changes to the PCJ. All groundwater samples collected in 2025 were analyzed for the Site-specific list of targeted organic compounds, total recoverable phenolics, and total organic carbon (TOC).

Specific conductance, pH, and temperature were measured in the field during sample collection. The results of the annual monitoring are further discussed in Section 2.3.

2.2 Hydraulic Effectiveness of the IT

Total monthly precipitation in Niagara Falls and Buffalo, New York during 2025 (obtained from the National Oceanic and Atmospheric Administration [NOAA]) is provided in **Table 2.1**. Monthly precipitation for both areas is provided since the Site is approximately equidistant between both official weather stations. In 2025, 30.89 inches of rain was recorded at the NOAA Niagara Falls station while 31.49 inches of rain was recorded at the NOAA Buffalo station. It is reasonable to conclude that an average of the two recorded rainfall totals was received at the Durez NT site (i.e., approximately 31.19 inches).

Groundwater elevation contour maps developed using groundwater elevations measured on March 27 and September 3, 2025 (presented as **Figures 2.1** and **2.2**, respectively) show the configuration of the water table surface for each monitoring event. Due to the steep hydraulic gradient created by the IT (lower groundwater elevation in the trench than in the piezometers inside and outside the trench), not all of the contour lines immediately adjacent to the IT can be shown on the contour maps. Groundwater elevations for 2025 are presented in **Table 2.2**. Two additional monitoring wells, NP-19 and NP-27 were hydraulically monitored in addition to the monitoring wells and piezometers in the current hydraulic monitoring program to provide additional hydraulic information in the vicinity of piezometer T-2A. The significance of piezometer T-2A is further discussed in Section 2.2.3.

Groundwater elevations for the T-series piezometers are presented on **Figures 2.1** and **2.2** to show the magnitude of the hydraulic gradient adjacent to the IT. The water levels in a number of the piezometers (A, B, and C piezometers, respectively) were dry when measured due to the influence of the trench and limited local recharge. Pumping from the IT is maintained such that the water level is below the top of the glaciolacustrine clay unit, which serves as the lower confining unit for the overburden groundwater at the Site. Maintaining this lowered groundwater elevation causes the IT to act as a continuous sump surrounding the Site.

In the NYSDECs July 9, 2025 Periodic Review Report (PRR) Response Letter accepting the 2024 PRR, the NYSDEC indicated that the following item warranted comment for correction in future reports.

- 1) *“NT Plant - Table 2.2, T-8 Cluster Elevations: The bottom of well elevations for the T-8 cluster appear to be incorrect based on field measurements and groundwater levels. Please revise accordingly and provide a discussion as to why the well construction elevations were revised.”*

In response to the NYSDECs comment, GSH reviewed available data to evaluate the apparent discrepancy associated with the bottom elevations for the T-8 piezometer cluster. Based on the review, GSH determined that piezometers T-8A and T-8B information is correct and that the T-8C piezometer had discrepancies related to well bottom elevation and depth to water elevations. It appears that the T-8C discrepancies may be related to past construction work that was completed in the area of the T-8 cluster around October 2012. At that time, an engineered subsurface wetland was being installed north of the T-8 cluster as a surface water drainage improvement. During the construction, one of the T-8 piezometers was damaged by a bulldozer performing grading work. As a result, the piezometer had to be re-drilled and replaced. It is unclear from historical documents which piezometer(s) was damaged and the new boring log has been unable to be located in the archived documents. Based on one historical document, it appears that the new piezometer may not have been re-surveyed after being installed which would account for the discrepancies associated with depth to water measurements being greater than the “old” constructed well bottom. GSH believes the new well bottom for the T-8C piezometer is around 10 feet below the reference elevation. A well bottom depth of 10 feet would correct past discrepancies where the measured water depth is greater than the well bottom. To address the missing information and have an accurate well bottom depth, GSH proposes to resurvey and redevelop the T-8 clusters in the spring of 2026. Redevelopment will ensure that the well is free of any potential silt and that newly surveyed well bottom measurements are accurate.

2.2.1 Spring Hydraulic Monitoring Event

During the March 27, 2025 hydraulic monitoring event (refer to **Figure 2.1**), an inward gradient was observed at all twelve trench piezometer arrays with the exception of piezometer arrays T-3, T-5, and T-8.

- A review of the elevation data for piezometer array T-3 indicates that the elevation of the IT (T-3B-571.99 feet [ft]) was 1.22 feet higher than the exterior T-3A (570.77 ft) piezometer elevation. T-3 is located along the western edge of the property on a section of the IT that runs north to south between Wilson and Harding Avenue (i.e., between manholes MH17+20.8 and MH19+76.3). Groundwater elevations for nearby well NP-35 (577.42 ft) indicate that the groundwater elevation is variable in this area with a minor gradient towards the IT.
- A review of the elevation data for piezometer array T-5 indicates that the elevation of the IT (T-5B-571.20 ft) was 0.22 ft higher than the exterior T-5A (dry at 570.98 ft) piezometer

elevation. T-5 is located north of Lift Station 2 (29+85.3) on the northern portion of the IT. The nearest monitoring well to T-5 is NP-22A, which had a groundwater elevation of 574.33 ft which is 3.35 ft higher than the T-5A elevation and therefore would indicate the groundwater gradient for that area is towards the IT.

- A review of the elevation data for piezometer array T-8 indicates that the elevation of the IT (T-8B-573.67 ft) was 1.68 ft higher than the exterior T-8A (571.99 ft) piezometer elevation. T-8 is located west of Lift Station 3 (46+28.2) on the northern portion of the IT. A review of elevation data indicated that groundwater elevation in nearby monitoring well MW-3 (572.09 ft AMSL) is approximately 0.1ft higher than the groundwater elevation measured in T-8A (571.99ft ASML) indicating an overall inward hydraulic gradient from MW-3 toward the IT.

At three (3) of the 12 piezometer arrays, (T-2, T-5, and T-13) at least one of the piezometers was dry during the March monitoring event. The following discussion provides additional information for each piezometer array that had one or more piezometers that was dry to support an inward gradient towards the IT, with the exception of T-5, which was previously discussed.

- T-2 Piezometers Array: the T-2C (interior) piezometer was dry. Comparison of the measured bottom depth of T-2B (565.57 ft AMSL) with the groundwater elevation measured in T-2A (570.64), which is located outside of the IT, indicates an inward gradient toward the trench at this array.
- T-13 Piezometer Array: the T-13C (interior) piezometer was dry. A review of the elevation data for piezometer array T-13 shows that the measured bottom depth of the IT (T-4B-564.95 ft) was 3.44 feet lower than the exterior T-4A measured bottom depth of 568.39 ft, which is located outside of the IT. Therefore, an inward hydraulic gradient towards the trench was present at this array.

2.2.2 Fall Hydraulic Monitoring Event

During the September 3, 2025 hydraulic monitoring event (refer to **Figure 2.2**), an inward gradient was observed at each of the trench piezometer arrays. At 10 of the 12 piezometer arrays (T-2, T-4, T-5, T-6, T-7, T-8, T-9, T-10, T-11, and T-12), at least one of the A, B or C piezometers in the array was dry. However, using the elevation of the bottom of the dry well, an inward gradient was still observed at each of these locations, with the exception of T-8. The following discussions provide additional information for each piezometer array that had one or more piezometer that was dry to support an inward gradient towards the IT.

- For the T-2 piezometers, the T-2B (trench) and T-2C (interior) piezometers were dry. When the bottom depth elevation of piezometer T-2B (563.97 ft) is compared to the groundwater elevation in piezometer T-2A (567.94 ft), which is located directly outside of the IT, an inward hydraulic gradient towards the trench was present at this array.
- At the T-5 piezometer locations, all three piezometers were dry. When the bottom depth elevation of piezometer T-5B (564.13 ft) (trench) is compared to the bottom depth

elevation of piezometer T-5A (570.98 ft), which is located outside of the IT, an inward hydraulic gradient towards the trench was present at this array.

- A review of the elevation data for piezometer array T-4 shows that the bottom depth elevation of the IT (T-4B-565.60 ft) was 4.37 feet lower than the exterior T-4A bottom depth elevation of 569.97 ft, which is located directly outside of the IT. Therefore, an inward hydraulic gradient towards the trench was present at this array.
- When the groundwater elevation in piezometer T-6B (565.74 ft) is compared to the bottom depth elevation of piezometer T-6A (569.98ft), which is located directly outside of the IT, and the groundwater elevation in the nearby monitoring well NP-22A (568.71 ft), which is located outside of the IT and in close proximity to array T-6, an inward hydraulic gradient towards the trench can be assumed to be present at this location.
- Piezometer array T-7 is located on a lateral of the IT that is perpendicular to the IT. As such T-7A and T-7C would both be considered exterior piezometers. All three T-7 piezometers were dry during the monitoring. Based on bottom elevation of 565.81 ft for the IT (T-7B), an inward gradient can be concluded since the bottom elevations at T-7A (569.47 ft) is 3.66 ft higher and at T-7C (567.59 ft) is 1.78 ft higher than the trench.
- A review of the elevation data for piezometer array T-8 indicates that the elevation of the IT (T-8B) is 571.57 ft which is 0.55 ft higher than the bottom elevation of piezometer T-8A (571.02 ft). This would indicate a potential minor outward gradient. However, the groundwater elevation for piezometer T-8C (568.98 ft) is 2.59 ft lower than the trench indicating a strong inward gradient towards the interior of the IT and the Site. Based on the steeper gradient towards the interior of the site as compared to the minor outward gradient, it is reasonable to conclude that the overall gradient outside the IT is towards the IT.
- When the groundwater elevation in piezometer T-9B (568.17 ft) is compared to the bottom elevation of piezometer T-9A (571.00 ft), which is located directly outside of the IT, the T-9B elevation is 2.83 ft lower than the exterior elevation. This would indicate an inward gradient for this location.
- When the bottom elevation of piezometer T-11B (566.27 ft) is compared to the groundwater elevation in piezometer T-11A (569.62 ft) an inward hydraulic gradient towards the trench was present at this location.
- A review of the elevation data for piezometer array T-12 shows that the bottom elevation of piezometer T-12B (563.77 ft) was 4.67 feet lower than the exterior T-12A groundwater elevation (568.44 ft), which is located directly outside of the IT. Therefore, an inward hydraulic gradient towards the trench was present at this array.

2.2.3 Hydraulic Containment at the T-2 Piezometer Cluster

In December 2008, GSH submitted a letter to the NYSDEC detailing 1) the discovery of NAPL presence in T-2A, and 2) the investigation activities that were conducted to identify the cause of

the NAPL presence. Subsequently, GSH and the NYSDEC agreed that GSH would continue to pump the NAPL from the T-2A location and monitor hydraulic conditions at T-2A and surrounding wells to demonstrate a continued inward gradient towards the IT in this area.

Per comment No. 1 of the NYSDEC's response letter for the 2022 Periodic Review Report (PRR) for Durez NT/Inlet Site, GSH agreed to pump piezometer T-2A to dry (pump all groundwater and NAPL to the extent possible out of T-2A) to evaluate if the formation still contains mobile NAPL. Although GSH is only required to check T-2A for the presence of NAPL annually, T-2A was checked for NAPL during the fall semiannual hydraulic monitoring event on September 3, 2025. No NAPL was observed during either monitoring event. **Table 2.3** presents the groundwater elevations observed during the semiannual (March and September) hydraulic monitoring at T-2A and surrounding monitoring wells. Groundwater elevations in these wells and piezometers from the March 27 and September 3, 2025 monitoring events are shown on **Figures 2.3** and **2.4**, respectively. As indicated in Section 2.2, an inward gradient into the trench was present at piezometer array T-2 during both semiannual monitoring events. **Table 2.4** shows the total amount of NAPL pumped from T-2A and the NAPL thickness from 2008 through 2025. NAPL recovery from the T-2A piezometer has declined following its discovery in 2008 with recovery volumes decreasing quickly from a high of 82 ounces in 2008 to no measurable recovery as early as in 2013 with a negligible amount of 0.1 ounces recovered in April 2023. Since April 2023, no NAPL has been extracted from T-2A. GSH recommends that the focused T-2 monitoring be discontinued since no NAPL has been observed in the piezometer since April 19, 2023.

2.3 Groundwater Quality Monitoring

Groundwater quality monitoring at the Site consists of seven monitoring wells (NP-22A, NP-23, NP-27, P-32A, NP-35, NP-44, and NP-46) sampled annually. The annual groundwater sampling event was conducted on April 3, 2025. Three of the seven monitoring wells (NP-22A, P-32A, and NP-46) produced a sufficient volume of groundwater for sampling during this event. Wells NP-23, NP-27, NP-35, and NP-44 did not yield sufficient groundwater to either purge prior to sampling or sample after purging and, therefore, were considered "dry". Purge records for this event are presented in **Appendix B**.

Groundwater samples were submitted to the New York State Department of Health (NYSDOH) National Environmental Laboratory Approval Program (NELAP New York ID #10145) certified laboratory ALS Environmental (ALS) located in Rochester, New York for analysis for the following analytes/parameters and associated required method detection and reporting limits:

Table A Analytical Analytes/Parameters

Targeted Organic Compounds	Reporting Limit (RL) (µg/L)	Method Detection Limit (MDL) (µg/L)
Benzene	1.0	0.20
Chlorobenzene	1.0	0.20
Toluene	1.0	0.20
2-Chlorotoluene	1.0	0.20
1,2-Dichlorobenzene	1.0	0.20
1,4-Dichlorobenzene	1.0	0.20
1,2,3-Trichlorobenzene	1.0	0.25
1,2,4-Trichlorobenzene	1.0	0.34
Total Recoverable Phenolics	5.0	2.9
TOC	1,000.0	500

Notes:

µg/L – micrograms per liter

In addition to the above analytes, measurements of pH, temperature, specific conductivity, turbidity, dissolved oxygen, and oxidation/reduction potential were conducted and documented in the field by the sampling team. The quality assurance/quality control (QA/QC) data verification/validation review for the sampling event is presented in **Appendix C**.

2.3.1 Summary of Groundwater Chemistry Results

A summary of the analytical results for the 2025 groundwater quality monitoring event is presented in **Table 2.5**. Volatile organic compounds (VOCs) and total recoverable phenolics were non detect at the laboratory RLs for the samples collected from the three wells sampled. As indicated in the QA/QC review in **Appendix C**, the laboratory reported results to the laboratory's MDL for each analyte. These MDLs are shown in **Table A** above. With the exception of the MDL for total recoverable phenolics, these MDLs are less than or equal to the New York State (NYS) Class GA Groundwater Standards (Class GA Groundwater Standards) set forth in the NYSDEC *Division of Water Technical and Operational Guidance Series (1.1.1), Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations (June 1998)*. No detections for total recoverable phenolics were reported. TOC concentrations were detected above the RL, but there is no NYS water quality standard for TOC. Historical groundwater data is presented in **Appendix D**. A comparison of the April 2025 results to the historical data indicates that the April 2025 sample results are within the historical range for the Site. The IT continues to prevent off-Site migration of Site groundwater as well since no detections were observed in wells outside of the IT.

In addition to completing the routine groundwater monitoring, GSH also completed a supplemental groundwater monitoring event per the NYSDEC's request outlined in their Periodic Review Report (PRR) Response Letter dated April 19, 2024.

A workplan was submitted to the NYSDEC in response to the request and accepted August 1, 2024. The sampling of 21 wells located in the interior of the IT was scheduled to be completed during the “wet” season in early spring of 2025 when soil conditions are considered to be at the greatest saturation and groundwater levels at their highest. The sampling was completed March 12 through 15, 2025. A summary and discussion of the additional groundwater data is presented in **Appendix G**. Overall, the results were consistent with historical information and confirming groundwater impacts for the site are essentially unchanged (i.e., they remain consistent with the initial investigation findings).

3. GROUNDWATER COLLECTION SYSTEM AND PANHANDLE REMEDIATION

This section has been prepared to fulfill the requirements for the Groundwater Collection System and Panhandle Remediation Annual Report as set forth in Appendix B of the PCJ. The *Operation and Maintenance (O&M) Manual*, dated July 2019, provides procedures and protocols for the instrumentation, operation, maintenance, and inspection of the system.

3.1 Groundwater Collection System

The groundwater collection system consists of an 8,300-foot long groundwater IT, one lateral trench that extends off the former plant property to the south in the southwest corner of the IT, one lateral trench that extends to the north of the IT on the north portion of the property, three lift stations, and a main collection pump station (**Figure 1.2**). The IT creates a closed-loop groundwater sink and a groundwater flow divide around the Site between on-site impacted areas and clean off-site areas. Underground piping conveys collected groundwater to a NAPL decanter and then into two aboveground steel storage tanks from which the water is pumped to an on-Site activated carbon treatment system. The collected water is treated by the on-Site process. After treatment with granular activated carbon (GAC), the treated water is discharged under the Site's NYSDEC SPDES permit (No. NY0001198) to the City of North Tonawanda storm sewer system.

Since 2011, all collected groundwater has been recovered through the IT. Approximately 50.7 million gallons of groundwater from the IT were collected, treated, and discharged in 2025 compared to 37.9 million gallons in 2024. The volume of water treated and discharged was reported to the NYSDEC in the monthly NYSDEC SPDES Discharge Monitoring Reports (DMRs).

A lateral drain is present and runs from the bedding of the City of North Tonawanda storm sewer located in Walck Road to trench manhole MH-4+20.2. This lateral is designed to drain the sewer bedding into the IT system to capture any chemistry potentially present in the bedding.

Semiannual inspections of each of the trench manholes were performed on May 30 and August 22, 2025. The inspection results are included in **Appendix E**.

Inspection of the treatment system carbon beds and groundwater collection system is conducted on a daily basis. The inspections conducted in 2025 did not identify any significant issues with the treatment and the groundwater collections system except for routine repairs mentioned in Section 4.2. The treatment and groundwater collection systems functioned as designed.

3.2 Panhandle Remediation

The inspections required by the panhandle monitoring program were conducted on June 18, 2025, and November 7, 2025. The inspection forms for 2025 are included in **Appendix E**.

Vegetation is plentiful, native species of wetland/forestland plants are colonizing the area, and there are no obvious symptoms of stress. In addition to the native colonization, native trees and shrubs were planted in the areas surrounding the engineered wetlands and along the access road on the east side of the panhandle area. The ditch culverts are in good condition, and there is good accessibility to monitoring wells.

4. SITE ACTIVITIES

The activities and repairs performed in 2025 are summarized in the sections below. The activities are grouped into five categories: IT Maintenance, Site Inspections, Monitoring Well/Piezometer Maintenance, Process, and Non-Process. Process Activities are activities that influenced the treatment system for the Site; Non-Process Activities are activities performed on Site during the year that had no impact on the treatment system for the Site.

4.1 IT Maintenance

The semiannual inspections of the trench manholes, which were performed on May 30, 2025, and August 22, 2025, revealed minor sediment deposition was occurring within the IT which is normal for the IT. Inspection forms are included in **Appendix E**.

4.2 Well Piezometer Maintenance

Well inspections were conducted during July 15 through 18, 2025. The inspection revealed that well P-34 had snowplow damage resulting in the monitoring well being bent at a 30- to 40-degree angle. The well was repaired December 2, 2025, and will be resurveyed in the spring. The O&M Manual, along with the Site database, will be updated to reflect the new survey data.

Routine maintenance performed on other wells included repairing locks, touch-up painting and replacing J-plugs as needed.

4.3 Regulatory Site Inspections

On November 6, 2025, the NYSDEC conducted an inspection to assess the facility's compliance with the terms and conditions of its State Pollutant Discharge Elimination System (SPDES) Permit. The inspection result was deemed satisfactory, and the plant is being operated in compliance with the requirements of the Site's SPDES permit. The inspection letter can be found in **Appendix H**.

On November 28, 2025, the NYSDEC conducted a Hazardous Waste Compliance Inspection. The inspection found no violations. The inspection result letter can be found in **Appendix I**.

4.4 Process Activities

Activities that were performed during 2025 related to the Site's collection and treatment process are listed below:

- Performed as needed preventative maintenance on Site equipment throughout the year,
- Repaired a broken pipe in Lift Station #1,
- Repaired 4-inch check valve at Main Lift Station,
- Removed and replaced 4-inch containment valve in pump room,
- Installed 2-inch check valve in line on the decanter sump,

- Repaired piping on treatment tank manifold valve wall,
- Completed a flow meter calibration check,
- Replaced 016 influent line sample port,
- Changed bag filters,
- Replaced and reinsulated sections of piping from Main Lift Station to Decanter,
- Installed new ultrasonic level sensors in Main Lift Station, Lift Station #1 and Lift Station #2
- Completed preventative maintenance on multi-media filtration units, and
- Shipped spent filter bags and PPE for off-Site hazardous waste disposal.

The tracking of hazardous waste is performed by regulated hazardous waste manifests. A summary of the Site's annual hazardous waste generation is reported to the NYSDEC in the *Annual Hazardous Waste Report*. The *Annual Hazardous Waste Report* summarizes the quantities, transporters, and disposal methods.

An estimated total of 600 pounds of hazardous waste was generated from Site activities in 2025. The waste materials were sent off Site for disposal in accordance with applicable laws and regulations. The waste generated consisted of spent filter bags and PPE. Copies of the disposal manifests are provided in **Appendix F**

4.5 Non-Process Activities

Activities that were performed on Site during the year that were not part of the collection and/or treatment process are as follows:

- Performed Site beautification and maintenance of shrubs and bushes around the Treatment Process Building and mowed grass areas,
- Completed annual backflow preventer inspection,
- Completed annual fire extinguisher inspection,
- Removed downed trees and branches,
- Repaired motor drive on main entrance gate,
- Repaired Well P-34,
- Converted well P-34 from stick-up to flush mount,
- Disconnected and placed out of service non-functioning backup battery in the operator's office,
- Replaced damaged ceiling tiles in operator office,
- Installed snow fence, and
- Repaired potholes at entry gate.

5. CONCLUSIONS

5.1 Summary

The purpose and primary design objective of the IT is to capture and collect groundwater that could otherwise migrate off the Site and to capture and collect groundwater located outside the Site by creating a hydraulic gradient toward the trench. Approximately 50.7 million gallons of groundwater from the IT were collected, treated, and discharged in calendar year 2025. The 2025 groundwater contours and measured water levels at the piezometer clusters indicate that an inward gradient to the IT is being maintained. Therefore, the purpose and primary objective of the IT are being met.

The IT groundwater monitoring program is conducted to collect the hydraulic and groundwater chemical data necessary to evaluate the effectiveness of the IT and long-term trends in groundwater chemistry in selected monitoring wells. The hydraulic data collected in 2025 indicates that the IT is functioning effectively. The chemical groundwater data collected in 2025 demonstrates that the IT continues to intercept potentially impacted groundwater and prevent it from migrating off the Site.

The analytical results from the 2025 annual groundwater monitoring event showed no detectable concentrations of VOCs or total recoverable phenolics above the laboratory RLs. A comparison of the historical groundwater data and the April 2025 sample results indicate that the April 2025 results are within the historical range for the Site and that the IT continues to prevent off-Site migration of Site groundwater.

In 2025, the NAPL presence at piezometer T-2A was monitored through an annual measurement and semiannual water level rounds at select wells to demonstrate an inward gradient in the vicinity of T-2A (as indicated by a lower groundwater elevation in T-2A than monitoring wells farther outside of the IT besides T-2A). A NAPL presence check was performed on September 3, 2025. No NAPL was observed to be present during those events. Therefore, no additional NAPL was removed. No NAPL has been extracted from 2013 to date, with the exception of the requested purging in 2023 when 0.1 ounces of NAPL was recovered.

During the March 2025 hydraulic monitoring event, an outward gradient was observed at piezometers T-3, T-5 and T-6. During the September 2025 hydraulic monitoring event, an inward gradient was observed at all piezometer arrays except for piezometer T-8, which has had a history of demonstrating an outward gradient. As such GSH recommends continuing to monitor the T-8 piezometer array semiannually as required.

GSH also completed a review of available elevation data for the T-8 piezometer cluster as requested by the NYSDEC and confirmed a database discrepancy relative to the bottom elevation of the T-8C piezometer relative to measured groundwater elevations. To address the discrepancy and lack of available piezometer construction information for T-8C, GSH is recommending that the T-8 cluster be redeveloped and resurveyed in the spring in order to update the database with accurate information.

GSH completed a supplemental groundwater sampling event March 12 through 15, 2025 per the NYSDEC's request. Twenty-one (21) wells located to the interior of the IT were scheduled to be completed during the "wet" season in early spring 2025 when soil conditions are considered to be at their greatest saturation and groundwater levels at their highest. A summary and discussion of the additional groundwater data is presented in **Appendix G**. Overall, the results were consistent with historical information and confirmed groundwater impacts for the site are essentially unchanged (i.e., they remain consistent with the initial investigation findings).

In 2026, GSH will continue to monitor the IT and treatment systems in accordance with NYSDEC approved site documents and permits. GSH will also continue to monitor site drainage conditions and fence lines for evidence of erosion, damage, or other conditions that could affect site integrity.

6. RECOMMENDATIONS

GSH is recommending no changes to the chemical monitoring or site maintenance programs at this time. However, GSH is recommending two changes to the monitoring programs conducted at the Site. The two recommendations are as follows:

- Discontinue the NAPL presence checks, pumping at piezometer T-2A, and the additional hydraulic monitoring, and
- Reduce the frequency of daily inspections to twice weekly, and

Each of the recommendations is further discussed below.

Change 1 – Discontinue NAPL presence monitoring at piezometer T02A

GSH recommends discontinuing all tasks associated with the NAPL presence check at piezometer T-2A, based on system performance and historical monitoring results. With the exception of 0.1 ounces of NAPL recovered in 2023, no NAPL has been extracted from T-2A since 2016. In addition, the supplemental hydraulic evaluation at NP-19 and NP-27 has consistently verified that an inward gradient towards the IT exists continuously. Based on the sustained absence of recoverable NAPL and confirmed inward gradients, GSH recommends that routine NAPL presence checks at T-2A and the associated supplemental hydraulic evaluation at NP-19 and NP-27 be discontinued, subject to NYSDEC concurrence. Piezometer T-2A will continue to be monitored in accordance with the established semiannual and annual monitoring requirements.

Change 2 – Reduce daily inspections to twice per week

GSH would request that the daily inspections of the Site be reduced to twice weekly on non-consecutive days. Inspections have been completed daily for over 20 years in accordance with the Durez NT Operations and Maintenance Manual. Based on the lack of issues typically observed during the daily inspections¹, the need for daily inspections Monday through Friday is not warranted. Also, a reduction in inspections would reduce the overall carbon footprint impact since vehicle trips around the Site perimeter would be less frequently required.

Therefore, GSH is requesting that daily inspections be reduced to twice per week on non-consecutive days. GSH will continue to monitor and evaluate Durez NT for Site improvements associated with the operation, maintenance, and monitoring activities and make recommendations to the NYSDEC and USEPA as appropriate.

¹ It is worth noting that inspections are not completed on the weekends and no issues with the Site have been noted on the following Monday.

Tables

Table 2.1

**2025 Precipitation Data
Durez North Tonawanda
Glenn Springs Holdings, Inc.
North Tonawanda, New York**

Month	Niagara Falls (Inches of Water)	Buffalo (Inches of Water)
January	1.25	1.72
February	2.64	2.32
March	1.88	1.85
April	2.77	2.86
May	3.52	3.06
June	3.05	3.35
July	1.96	0.77
August	2.28	2.35
September	1.00	1.33
October	4.34	5.39
November	2.60	2.63
December	3.60	3.86
Total	30.89	31.49

Notes:

Data shown are for Niagara Falls and Buffalo, New York, obtained from the National Oceanic & Atmospheric Administration

Table 2.2

**2025 Groundwater Elevations
Durez North Tonawanda
Glenn Springs Holdings, Inc.
North Tonawanda, New York**

Well ID	Reference Elevation (ft. AMSL)	Bottom of Well Elevation (ft. AMSL)	March 27, 2025	September 3, 2025
MW-1	574.52	565.29	573.71	569.01
MW-3	577.01	564.77	572.09	568.51
MW-4	576.40	564.18	571.56	567.69
NP-10	579.79	567.99	574.07	570.81
NP-13	576.69	567.72	572.71	568.03
NP-15	578.91	568.28	575.14	569.07
NP-16	578.35	570.91	575.16	Dry, <570.9
NP-19	576.66	568.86	571.70	Dry, <568.79
NP-2	577.37	567.64	568.76	570.42
NP-20	577.62	569.09	Dry, <569.15	Dry, <569.17
NP-21	576.90	568.62	574.58	572.07
NP-22A	577.63	565.69	574.33	568.71
NP-23	577.92	569.03	569.34	569.41
NP-24	578.97	569.14	574.53	570.30
NP-25	578.33	568.35	573.60	572.71
NP-26	577.71	571.13	574.03	572.51
NP-27	577.22	567.37	571.06	Dry, <567.3
NP-32	577.25	571.45	577.25	Dry, <571.36
NP-35	577.42	567.50	577.42	568.48
NP-37	577.45	571.10	577.45	571.25
NP-38	578.09	571.21	578.09	Dry, <571.17
NP-4	577.16	567.81	577.16	575.18
NP-41	577.65	570.97	577.65	Dry, <570.88
NP-42	576.58	570.15	576.58	570.54
NP-43	577.08	571.12	577.08	Dry, <570.1
NP-44	576.63	570.31	576.63	565.99
NP-45	576.33	572.66	576.33	566.38
NP-46	576.87	567.71	576.87	Dry, <567.72
NP-51	577.36	568.38	577.36	572.62
NP-6	575.21	568.87	575.21	570.67
NP-8	577.20	568.37	577.20	569.82
P-1	578.88	571.27	578.88	573.65
P-11	580.14	569.95	580.14	572.19
P-13	581.43	568.54	581.43	573.43
P-16	578.32	570.99	578.32	571.64
P-17	577.46	572.00	577.46	573.08
P-1-96	574.93	567.85	574.93	Dry, <567.85
P-19A	580.01	567.83	580.01	570.23
P-23	578.83	571.70	578.83	Dry, <571.68
P-27	580.25	569.50	580.25	571.98
P-29	578.74	570.98	578.74	572.81
P-2-96	574.57	568.49	574.57	Dry, <568.56
P-30	579.28	571.28	579.28	Dry, <572.64
P-31	578.15	569.10	578.15	569.48
P-32A	577.67	565.70	577.67	568.87
P-34	576.12	566.39	576.12	567.93
P-3-96	574.42	567.76	574.42	Dry, <567.82
P-6A	578.93	566.13	578.93	570.20
P-7	577.46	567.91	577.46	571.16
SP-3	575.30	565.77	575.30	568.73

Table 2.2

**2025 Groundwater Elevations
Durez North Tonawanda
Glenn Springs Holdings, Inc.
North Tonawanda, New York**

Well ID	Reference Elevation (ft. AMSL)	Bottom of Well Elevation (ft. AMSL)	March 27, 2025	September 3, 2025
T-10A	576.64	569.73	571.48	Dry, <569.66
T-10B	577.29	567.69	568.68	567.65
T-10C	577.00	569.71	570.20	569.99
T-11A	577.10	569.56	569.83	569.62
T-11B	577.27	565.89	568.56	Dry, <566.27
T-11C	577.69	570.54	570.81	570.57
T-12A	574.64	567.41	568.45	568.44
T-12B	574.92	563.81	565.60	Dry, <563.77
T-12C	575.45	568.43	570.39	569.81
T-13A	575.09	568.18	568.39	568.15
T-13B	575.07	561.78	564.95	562.29
T-13C	574.98	569.39	Dry, <569.63	569.71
T-2A	577.86	565.94	570.64	567.94
T-2B	578.73	563.90	565.57	Dry, <563.97
T-2C	578.81	570.28	Dry, <570.23	Dry, <570.20
T-3A	577.71	569.02	570.77	569.02
T-3B	577.92	564.26	571.72	566.42
T-3C	578.00	565.83	571.18	567.56
T-4A	579.68	569.95	571.07	Dry, <569.97
T-4B	579.72	565.62	570.49	Dry, <565.60
T-4C	580.17	568.21	571.29	Dry, <570.59
T-5A	579.40	570.75	Dry, <570.98	Dry, <570.98
T-5B	578.63	564.14	571.20	Dry, <564.13
T-5C	575.74	572.41	575.55	Dry, <571.82
T-6A	578.98	569.94	571.30	Dry, <569.98
T-6B	579.22	565.18	571.21	565.74
T-6C	580.41	568.62	573.72	Dry, <568.93
T-7A	578.77	571.52	571.28	Dry, <569.47
T-7B	576.07	570.13	569.07	Dry, <565.81
T-7C	576.72	571.33	569.52	Dry, <567.59
T-8A	575.87	571.11	571.99	Dry, <571.03
T-8B	575.97	565.99	573.67	571.57
T-8C	578.82	572.78	573.49	568.98
T-9A	579.12	571.04	573.27	Dry, <571.00
T-9B	575.91	568.43	570.09	568.17
T-9C	578.24	571.79	575.11	Dry, <571.76

Notes:

ft. AMSL - Feet above mean sea level
 Dry - No water found in well at time of measurement
 NM - Not measured

Table 2.3

**2025 T-2A NAPL Presence - Hydraulic Monitoring
Durez North Tonawanda
Glenn Springs Holdings, Inc.
North Tonawanda, New York**

Well ID	Groundwater Elevations	
	March 27, 2025	September 3, 2025
NP-13	572.71	568.03
NP-19	571.70	Dry, <568.79
NP-20	Dry, <569.15	Dry, <569.17
NP-27	571.06	Dry, <567.3
NP-35	570.98	568.48
NP-4	576.79	575.18
P-1	574.40	573.65
P-1-96	570.85	Dry, <567.85
P-2-96	570.95	Dry, <568.56
P-3-96	568.78	Dry, <567.82
T-12A	568.45	568.44
T-12B	565.60	Dry, <563.77
T-12C	570.39	569.81
T-13A	568.39	568.15
T-13B	564.95	562.29
T-13C	Dry, <569.63	569.71
T-2A	570.64	567.94
T-2B	565.57	Dry, <563.97
T-2C	Dry, <570.23	Dry, <570.20
T-3A	570.77	569.02
T-3B	571.72	566.42
T-3C	571.18	567.56

Notes:

Elevations shown are in feet above mean sea level

Dry - No water found in well at time of measurement

NAPL - Non-Aqueous Phase Liquid

NM - Not measured

Table 2.4

**T-2A NAPL Pumping - 2008-2025
Durez North Tonawanda
Glenn Springs Holdings, Inc.
North Tonawanda, New York**

Date	NAPL Extracted (ounces)	NAPL Thickness (inches)
10/29/2008	32	NM
10/30/2008	8	NM
10/31/2008	8	NM
11/3/2008	8	NM
11/11/2008	8	NM
11/18/2008	6	3
12/3/2008	6	3
12/30/2008	6	3
03/31/2009	6	3
4/14/2009	6	3
04/28/2009	6	3
05/14/2009	5	3
05/28/2009	3	2
06/10/2009	3	2
06/16/2009	3	2
06/24/2009	3	3
07/07/2009	3	3
07/15/2009	3	3
07/31/2009	1	1
08/14/2009	1	1
08/31/2009	1	1
09/08/2009	1	1
09/24/2009	1	1
10/8/2009	1	1
10/22/2009	1	1
11/5/2009	1	1
11/18/2009	1	1
11/25/2009	1	1
12/9/2009	1	1
12/23/2009	1	1
04/06/2010	1	1
04/19/2010	1	1
05/03/2010	1	1
05/19/2010	1	1
06/02/2010	1	1
06/16/2010	1	1
06/30/2010	1	1
07/13/2010	1	1
03/28/2011	1	1
10/4/2011	0.2	0.2
03/23/2012	2	0.04
06/11/2012	2	0.02
08/14/2012	2	0.02
11/06/2012	8	0.08
02/06/2013	0	1.2
05/03/2013	0	0.2
08/01/2013	0	0.3
11/06/2013	0	Trace
02/24/2014	0	0.8
05/23/2014	0	0.8

Table 2.4

**T-2A NAPL Pumping - 2008-2025
Durez North Tonawanda
Glenn Springs Holdings, Inc.
North Tonawanda, New York**

Date	NAPL Extracted (ounces)	NAPL Thickness (inches)
08/08/2014	0	27.0*
11/19/2014	0	0.5
02/19/2015	0	0.1
04/08/2015	0	0.17
09/02/2015	0	0.17
11/19/2015	0	0.36
02/04/2016	0	0.15
05/04/2016	0	0.11
08/12/2016	0	0.11
11/30/2016	0	Trace
02/10/2017	0	0.03
05/26/2017	0	0.09
08/02/2017	0	Trace
12/07/2017	0	Trace
11/21/2018	0	Trace
11/12/2019	0	0.24
08/05/2020	0	0.48
08/25/2021	0	Trace
05/21/2022	0	Trace
04/19/2023	0.1	Trace
04/26/2023	0	Trace
09/14/2023	0	None
03/07/2024	0	None
09/10/2024	0	None
09/03/2025	0	None

Total NAPL Removed: 158.3 ounces

Notes:

NAPL - Non-Aqueous Phase Liquid

* - NAPL thickness represents an outlier reading with possible measurement error

NM - Not measured

Table 2.5

2025 Groundwater Monitoring Analytical Results

Durez North Tonawanda
Glenn Springs Holdings, Inc.
North Tonawanda, New York

Sample Location: Sample ID: Sample Date:				NP-22A ⁽³⁾ NP-22A-0425 04/03/2025	NP-22A ⁽³⁾ NP-70-0425 04/03/2025 (Duplicate)	NP-46 NP-46-0425 04/03/2025	P-32A P-32A-0425 04/03/2025
Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Reporting Limit				
Volatile Organic Compounds							
1,2,3-Trichlorobenzene	5	µg/L	1.0	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	µg/L	1.0	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	3	µg/L	1.0	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	3	µg/L	1.0	1.0 U	1.0 U	1.0 U	1.0 U
2-Chlorotoluene	5	µg/L	1.0	1.0 U	1.0 U	1.0 U	1.0 U
Benzene	1	µg/L	1.0	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	5	µg/L	1.0	1.0 U	1.0 U	1.0 U	1.0 U
Toluene	5	µg/L	1.0	1.0 U	1.0 U	1.0 U	1.0 U
General Chemistry							
Phenolics (total)	0.001	mg/L	0.0050	0.0050 U	0.0050 U	0.0050 U	0.0050 U
Total organic carbon (TOC)	-	mg/L	1.0	4.3	4.4	1.8	2.4
Field Parameters							
pH, field	6.5-8.5	s.u.	-	7.27	7.27	7.28	7.75
Temperature, field	-	deg C (deg F)	-	12.37	12.37	9.14	14.06
Conductivity, field	-	mS/cm	-	3.82	3.82	0.858	4.62
Turbidity, field	-	NTU	-	1.49	1.49	1.58	2.52
Dissolved oxygen (DO), field	-	mg/L	-	1.51	1.51	7.78	4.04
Oxidation/reduction potential (ORP), field	-	mV	-	81	81	175	150

Notes:

- (1) - Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgement; except analyses for total Recoverable Phenolics were reported as Phenols in February 1984
- (2) - Groundwater standards are NYS Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998
- (3) NP-22A was installed in November 1993, approximately 10 feet from the former location of NP-22
- µg/L - Micrograms per liter
mg/L - Milligrams per liter
s.u. - Standard Unit
mS/cm- Millisiemens per centimeter
NTU - Nephelometric Turbidity Unit
mV - millivolts
U - Not detected at associated value
- Not applicable

Table 3.1

**Amount of Groundwater Collected, Treated, and Discharged
Durez North Tonawanda
Glenn Springs Holdings, Inc.
North Tonawanda, New York**

	2009	2010	2011	2012	2013	2014	2015	2016
January	3,485,190	3,854,930	2,650,700	5,335,740	3,231,360	4,586,280	1,934,470	3,048,280
February	4,612,420	2,209,340	2,978,010	4,444,102	4,124,780	3,409,460	986,810	2,897,631
March	3,881,280	5,066,000	6,251,990	2,705,340	3,531,350	4,826,570	4,195,900	5,775,869
April	4,021,260	3,996,780	5,471,000	2,535,380	3,691,220	5,182,290	5,870,300	4,796,230
May	1,930,190	2,023,190	6,065,870	2,810,520	2,280,410	5,079,766	2,141,730	1,851,760
June	595,340	1,693,990	3,351,220	857,290	4,342,820	1,485,230	1,963,520	582,440
July	2,080,260	646,180	1,275,310	224,970	2,947,920	697,720	1,409,860	182,150
August	2,157,280	669,660	272,930	205,560	1,234,630	837,390	539,320	428,300
September	695,660	313,300	715,090	213,460	942,990	480,540	773,640	189,880
October	1,179,660	0	3,694,708	1,355,530	4,396,380	409,690	1,331,590	521,980
November	2,092,380	1,783,707	2,620,180	1,694,640	4,239,560	286,940	1,337,830	575,645
December	5,686,910	3,022,380	5,363,970	2,699,450	3,946,630	1,726,420	1,708,220	1,763,175
Total	32,417,830	25,279,457	40,710,978	25,081,982	38,910,050	29,008,296	24,193,190	22,613,340

Note:

Monthly and Yearly volumetric totals are in gallons

Table 3.1

**Amount of Groundwater Collected, Treated, and Discharged
Durez North Tonawanda
Glenn Springs Holdings, Inc.
North Tonawanda, New York**

	2017	2018	2019	2020	2021	2022	2023	2024	2025
January	3,145,950	4,550,700	4,361,440	5,541,190	3,580,021	2,881,880	5,812,375	3,233,895	5,056,589
February	2,599,070	4,004,679	4,596,070	4,870,160	1,180,919	3,423,608	3,996,489	0	3,849,537
March	4,298,730	5,187,190	4,649,250	5,149,140	3,538,430	5,451,527	5,898,348	4,360,483	6,143,900
April	5,191,048	5,309,607	4,698,900	3,841,705	2,176,840	5,263,058	4,846,879	5,048,000	4,982,506
May	5,559,150	3,563,278	4,949,220	3,209,035	1,858,220	5,214,183	3,447,446	4,444,599	5,968,230
June	2,256,230	915,630	1,971,240	1,149,370	1,064,800	2,735,077	2,725,274	3,415,631	3,343,561
July	1,295,926	116,300	360,630	735,150	2,441,750	1,836,383	2,546,831	3,499,965	3,285,767
August	2,003,040	428,220	1,385,590	545,670	1,134,480	1,308,156	3,473,990	2,793,881	3,278,538
September	586,360	550,600	772,620	197,160	1,753,210	1,765,447	1,382,112	2,159,035	2,613,988
October	1,996,940	659,860	1,367,960	291,870	1,973,280	1,855,375	1,270,055	2,246,750	3,271,565
November	3,937,280	3,534,687	3,152,030	875,099	4,027,370	3,011,779	1,411,136	2,585,885	4,088,795
December	2,814,870	4,117,818	5,043,910	2,180,211	3,263,500	4,040,583	3,800,068	4,137,070	4,778,728
Total	35,684,594	32,938,569	37,308,860	28,585,760	27,992,820	38,787,056	40,611,002	37,925,195	50,661,704

Note:

Monthly and Yearly volumetric totals are in gallons

Figures

A north arrow pointing upwards with the letter 'N' at its base. Below the arrow is a scale bar with alternating black and white segments, marked '0' at the left end and '2,000'' at the right end. The text 'SCALE IN FEET' is centered below the scale bar.

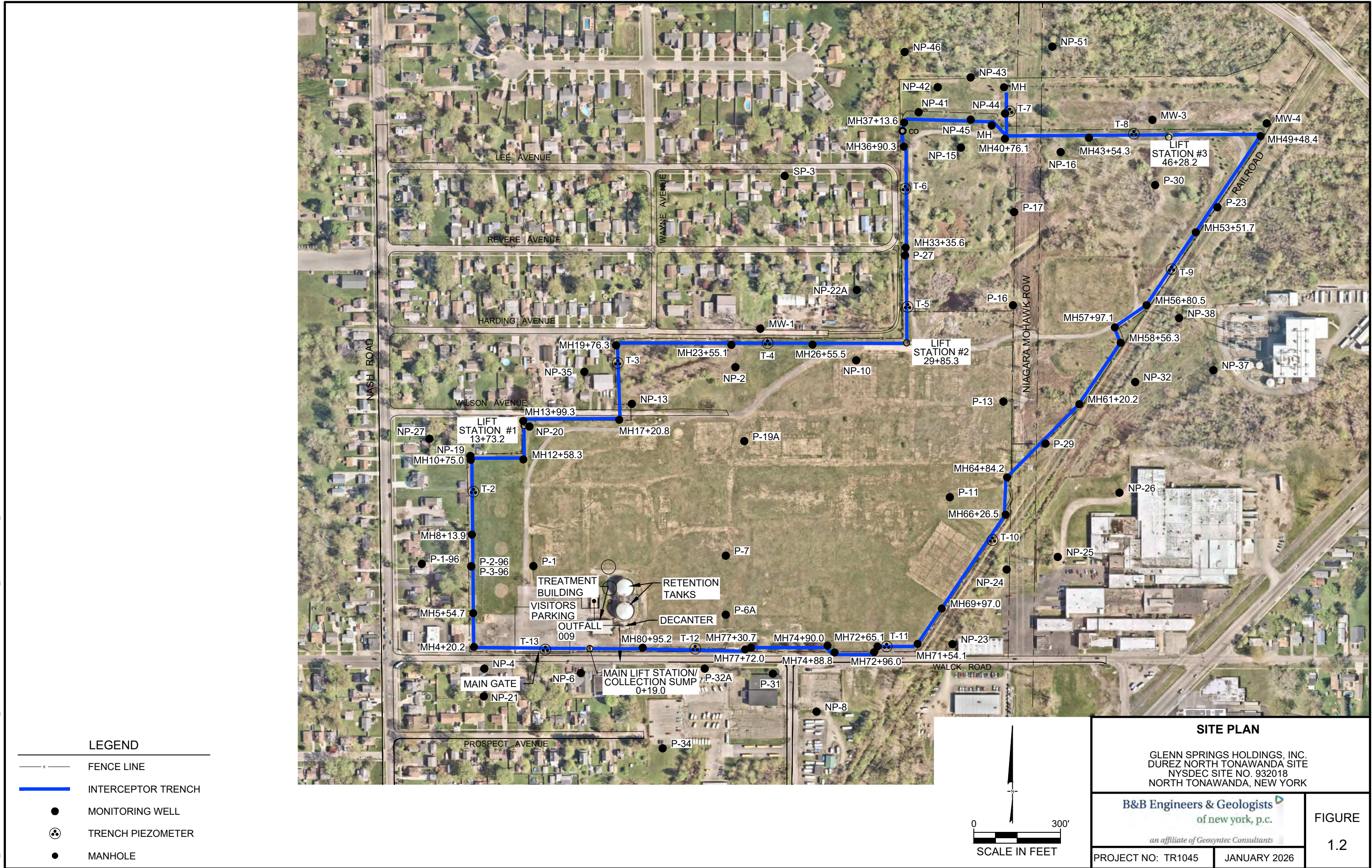
GLENN SPRINGS HOLDINGS, INC.
DUREZ NORTH TONAWANDA SITE
NYSDEC SITE NO. 932018
NORTH TONAWANDA, NEW YORK

an affiliate of Geosyntec Consultants

January 2026

1.1

C:\GEO-ACC\DOCS\GEO\SYNTEC\GSH_WNY 0&M\PROJECT FILES\CADD\03_DUREZ NTR\PT24_2025 PRR\DRAWINGS\SHEET\STR1045-002-SITE PLAN - MJerome 1/30/26



C:\GEO-ACC\DOCS\GEO\SYNTEC\GSH_WNY O&M\PROJECT FILES\CADD\03_DUREZ NTRPT24_2025 PRR\DRAWINGS\SHEETS\TR1045-003-GW MAR2025 - MJerome 9/19/25

WATER LEVELS AT
INTERCEPTOR TRENCH (IT)
MEASURED

TRENCH PIEZOMETER	A	B	C
T-2	570.64	565.57	<570.226
T-3	570.77	571.72	571.18
T-4	571.07	570.49	571.29
T-5	<570.98	571.20	575.55
T-6	571.30	571.21	573.72
T-7	571.28	569.07	569.52
T-8	571.99	573.67	573.49
T-9	573.27	570.09	575.11
T-10	571.48	568.68	570.20
T-11	569.83	568.56	570.81
T-12	568.45	565.60	570.39
T-13	568.39	564.95	<569.626

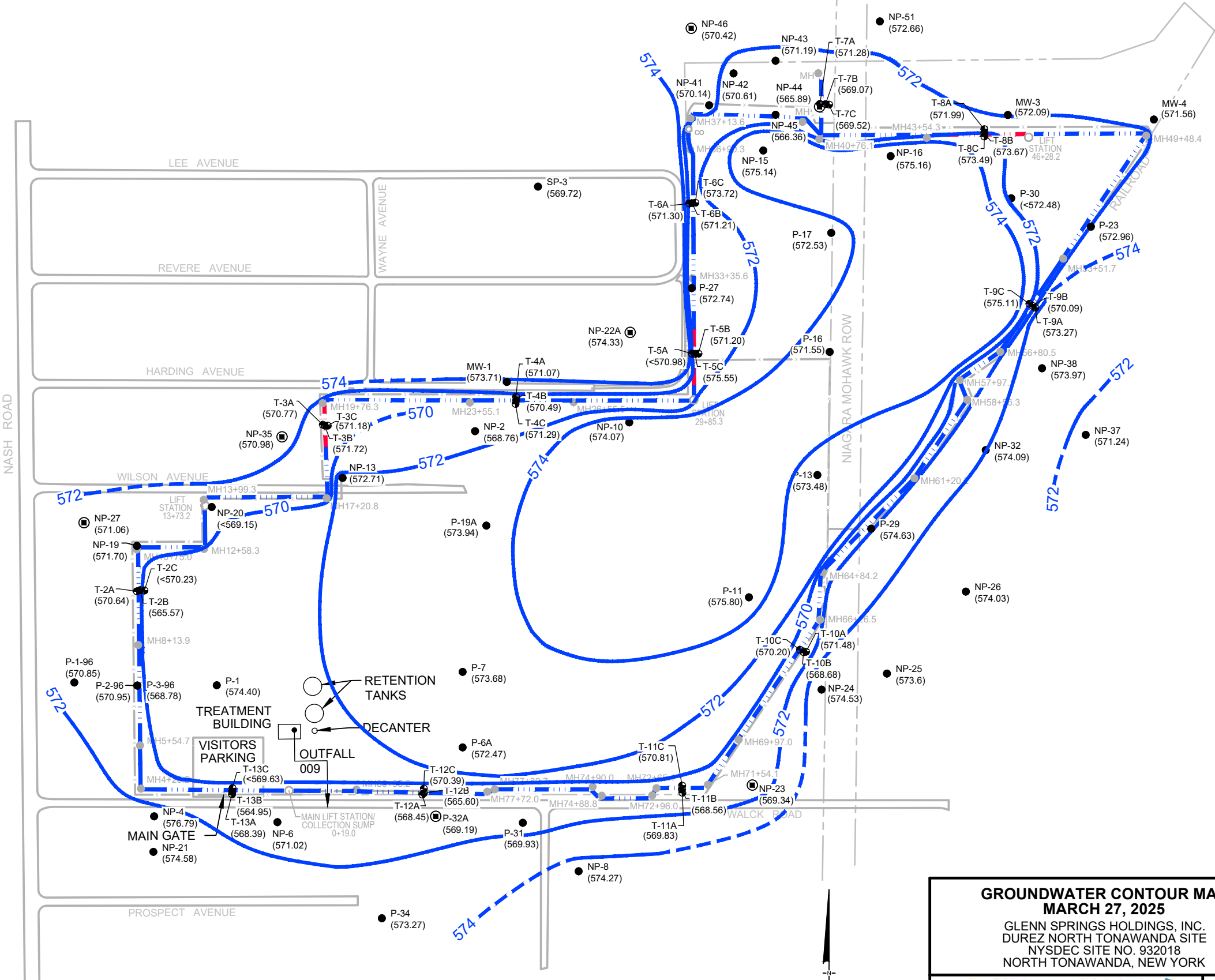
KEY

- A OFFSITE SIDE OF IT
B IN IT BACKFILL
C PLANT SIDE OF IT

LEGEND

- INTERCEPTOR TRENCH
INWARD GRADIENT (SEE NOTE 1)
- INTERCEPTOR TRENCH
OUTWARD GRADIENT (SEE NOTE 2)
- 572 GROUNDWATER CONTOUR
(DASHED WHERE INFERRED)
- MONITORING WELL
- (571.70) GROUNDWATER ELEVATION (ft AMSL)
- PIEZOMETER
- MONITORING WELL PART OF
GROUNDWATER CHEMISTRY
MONITORING PROGRAM
- MANHOLE
- <569.15 DRY DEPTH ELEVATION (ft AMSL)

- NOTES:
1. INWARD GRADIENT INDICATES WATER LEVELS AT TRENCH
PIEZOMETER B (IN IT BACKFILL) IS LOWER THAN THE
CORRESPONDING TRENCH PIEZOMETER A (OFFSITE SIDE OF IT).
2. OUTWARD GRADIENT INDICATES WATER LEVELS AT TRENCH
PIEZOMETER B IS EQUAL TO OR HIGHER THAN THE
CORRESPONDING TRENCH PIEZOMETER A.



GROUNDWATER CONTOUR MAP
MARCH 27, 2025

GLENN SPRINGS HOLDINGS, INC.
DUREZ NORTH TONAWANDA SITE
NYSDEC SITE NO. 932018
NORTH TONAWANDA, NEW YORK

B&B Engineers & Geologists
of new york, p.c.
an affiliate of Geosyntec Consultants

PROJECT NO: TR1045

SEPTEMBER 2025

FIGURE

2.1

C:\GEO\ACCO\DOCS\GEO\SYNTEC\GSH_WNY 0&M\PROJECT FILES\CADD\03_DUREZ NTR\PT24_2025 PRR\DRAWINGS\SHEET\STR1045-003-GW SEP2025 - MJerome 1/12/26

WATER LEVELS AT
INTERCEPTOR TRENCH (IT)
MEASURED

TRENCH PIEZOMETER	A	B	C
T-2	567.94	<563.97	<570.20
T-3	569.02	566.42	567.56
T-4	<569.97	<565.60	<570.59
T-5	<570.98	<564.13	<571.82
T-6	<569.98	565.74	<568.93
T-7	<569.47	<565.81	<567.59
T-8	<571.03	571.57	568.98
T-9	<571.00	568.17	<571.76
T-10	<569.66	567.65	569.99
T-11	569.62	<566.27	570.57
T-12	568.44	<563.77	569.81
T-13	568.15	562.29	569.71

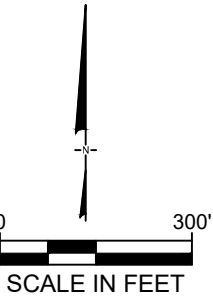
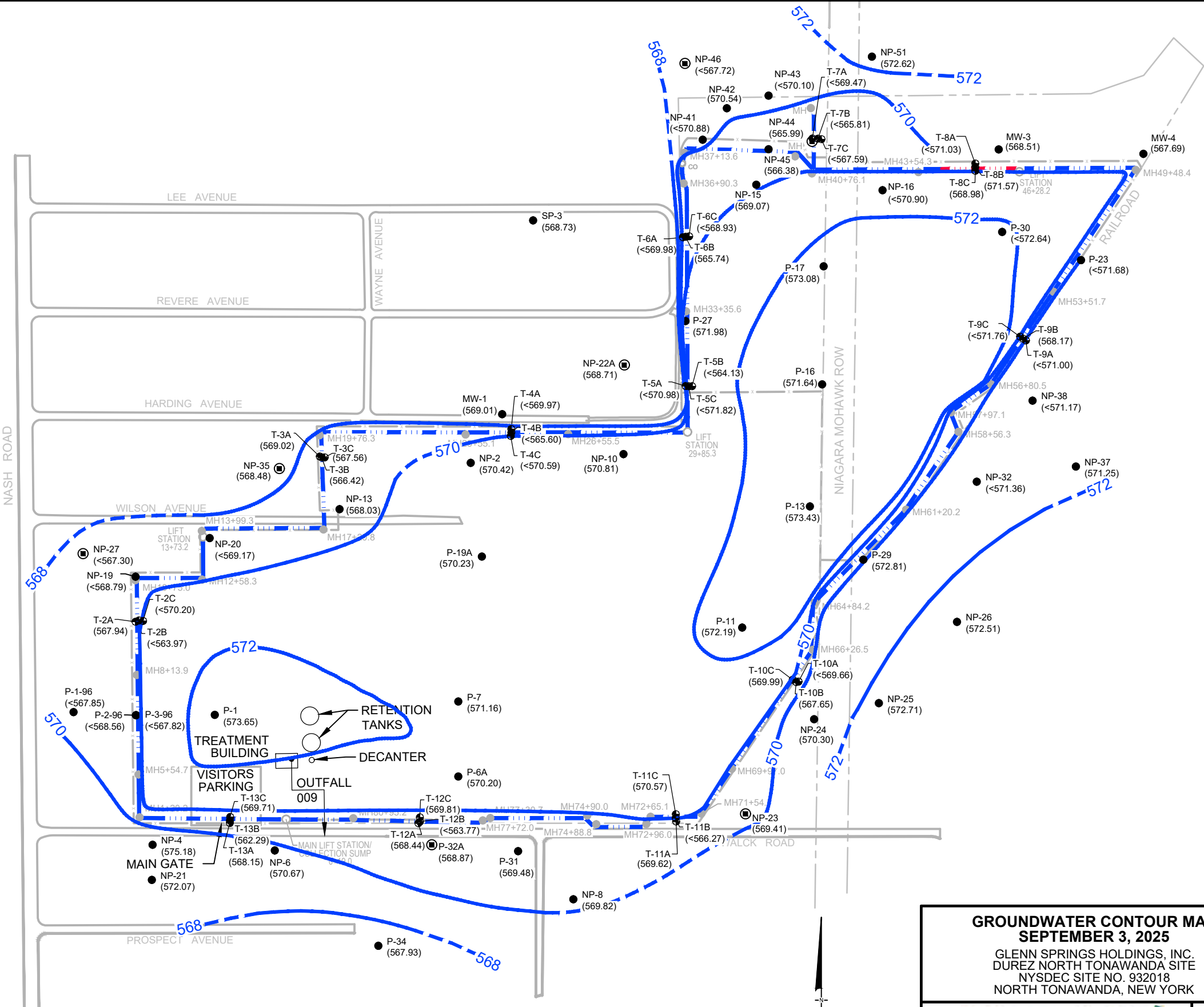
KEY

- A OFFSITE SIDE OF IT
B IN IT BACKFILL
C PLANT SIDE OF IT

LEGEND

- INTERCEPTOR TRENCH
INWARD GRADIENT (SEE NOTE 1)
- INTERCEPTOR TRENCH
OUTWARD GRADIENT (SEE NOTE 2)
- GROUNDWATER CONTOUR
(DASHED WHERE INFERRED)
- MONITORING WELL
- (572.07) GROUNDWATER ELEVATION (ft AMSL)
- PIEZOMETER
- MONITORING WELL PART OF
GROUNDWATER CHEMISTRY
MONITORING PROGRAM
- MANHOLE
- (<568.56) DRY DEPTH ELEVATION (ft AMSL)

- NOTES:
1. INWARD GRADIENT INDICATES WATER LEVELS AT TRENCH PIEZOMETER B (IN IT BACKFILL) IS LOWER THAN THE CORRESPONDING TRENCH PIEZOMETER A (OFFSITE SIDE OF IT).
2. OUTWARD GRADIENT INDICATES WATER LEVELS AT TRENCH PIEZOMETER B IS EQUAL TO OR HIGHER THAN THE CORRESPONDING TRENCH PIEZOMETER A.

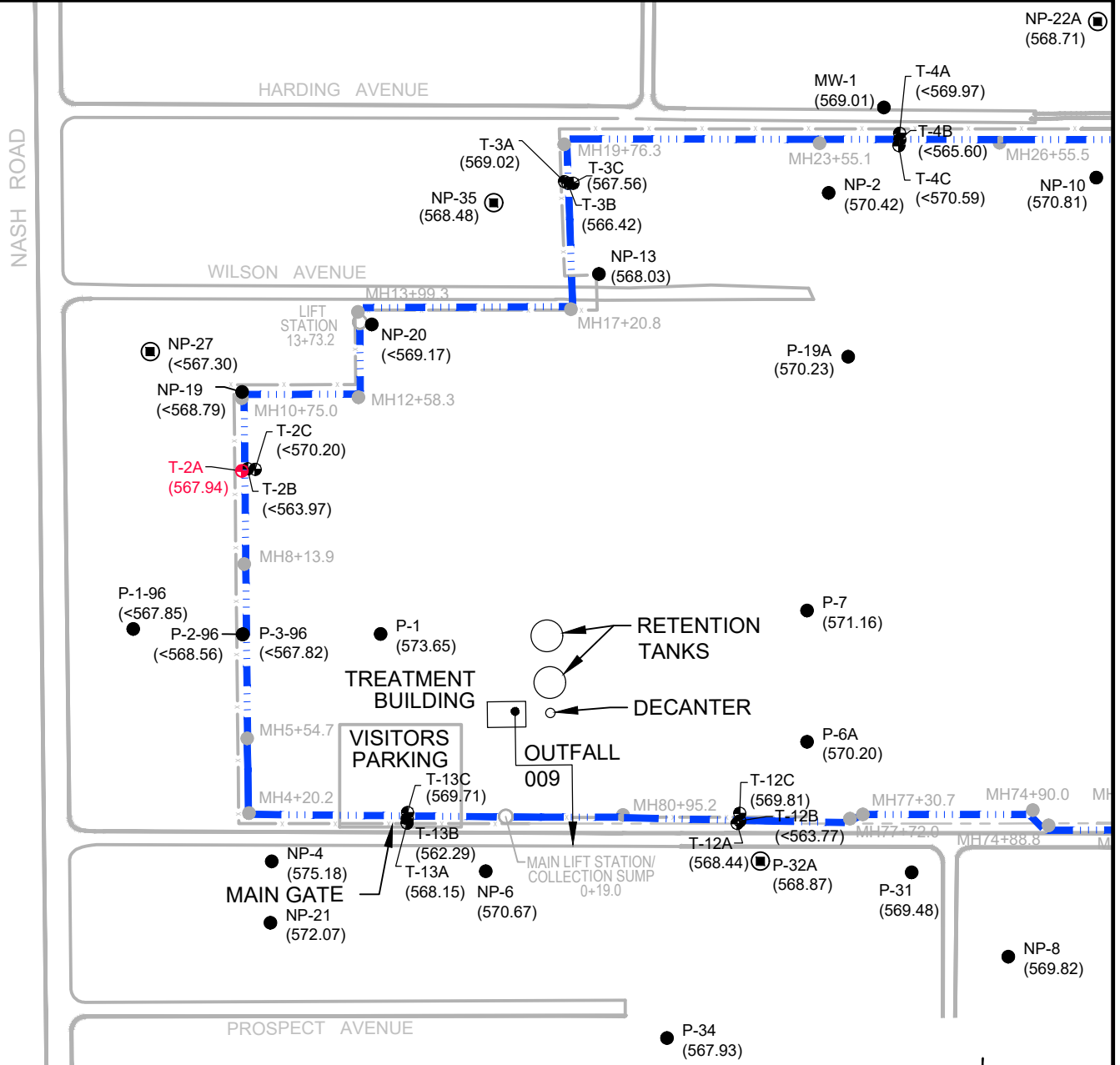


GROUNDWATER CONTOUR MAP
SEPTEMBER 3, 2025
GLENN SPRINGS HOLDINGS, INC.
DUREZ NORTH TONAWANDA SITE
NYSDEC SITE NO. 932018
NORTH TONAWANDA, NEW YORK

B&B Engineers & Geologists
of new york, p.c.
an affiliate of Geosyntec Consultants

PROJECT NO: TR1045 JANUARY 2026

FIGURE
2.2

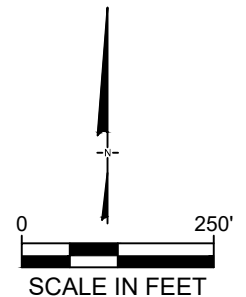


LEGEND

- | | | | |
|-----------|--|--|---------------------------------------|
| | INTERCEPTOR TRENCH INWARD GRADIENT (SEE NOTE 1) | | PIEZOMETER T-2A WHERE NAPL IS PRESENT |
| | INTERCEPTOR TRENCH OUTWARD GRADIENT (SEE NOTE 2) | | MANHOLE |
| | MONITORING WELL USED IN SEMIANNUAL HYDRAULIC MONITORING OF T-2A | | PIEZOMETER |
| | MONITORING WELL PART OF GROUNDWATER CHEMISTRY MONITORING PROGRAM | | |
| (572.07) | GROUNDWATER ELEVATION (ft AMSL) | | |
| (<568.56) | DRY DEPTH ELEVATION (ft AMSL) | | |

NOTES:

1. INWARD GRADIENT INDICATES WATER LEVELS AT TRENCH PIEZOMETER B (IN IT BACKFILL) IS LOWER THAN THE CORRESPONDING TRENCH PIEZOMETER A (OFFSITE SIDE OF IT).
2. OUTWARD GRADIENT INDICATES WATER LEVELS AT TRENCH PIEZOMETER B IS EQUAL TO OR HIGHER THAN THE CORRESPONDING TRENCH PIEZOMETER A.



GROUNDWATER ELEVATIONS NEAR T-2A SEPTEMBER 3, 2025

GLENN SPRINGS HOLDINGS, INC.
DUREZ NORTH TONAWANDA SITE
NYSDEC SITE NO. 932018
NORTH TONAWANDA, NEW YORK

B&B Engineers & Geologists
of new york, p.c.
an affiliate of Geosyntec Consultants

FIGURE

2.4

PROJECT NO: TR1045

JANUARY 2026

Appendix A

2025 Institutional and Engineering Controls

Certification Form



11/12/2025

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, 2026**. 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.

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 by contacting the project manager for a link to DEC's file transfer service.

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 Jason Kryszak, the Project Manager, at 716-851-7012 or jason.kryszak@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
700 Delaware Ave
Buffalo, NY 14209-2202

Enclosures

PRR General Guidance
Certification Form Instructions
Certification Forms

ec: w/ enclosures

Occidental Chemical Corporation - joseph_branch@oxy.com

ec: w/ enclosures

Jason Kryszak, Project Manager
Ben McPherson, Hazardous Waste Remediation Supervisor, Region 9

GHD - Margaret Popek - margaret.popek@ghd.com
GHD - John Pentilchuk - John.Pentilchuk@ghd.com
B&B Engineers and Geologists of New York, P.C. - Dennis Hoyt - dhoyt@geosyntec.com

The following parcel owner did not receive an ec:

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

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

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

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

- For the Institutional Controls on the use of the property, the certification statement in Box 6 shall be completed and may be made by the property owner or designated representative.
- For the Engineering Controls, the certification statement in Box 7 must be completed by a Professional Engineer or Qualified Environmental Professional, as noted on the form.

**NEW
YORK
STATE**

Date _____

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

Oar Marina, LLC

Monitoring Plan
O&M Plan

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

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

DNAPL Removal: Inlet Monitoring Plan, GHD 2019.

182.06-3-19

Occidental Chemical Corporation

Monitoring Plan
O&M Plan

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

182.06-3-20

Occidental Chemical Corporation

Monitoring Plan
O&M Plan

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

182.06-3-21

Occidental Chemical Corporation

Monitoring Plan
O&M Plan

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

182.07-1-14

Occidental Chemical Corporation

Monitoring Plan
O&M Plan

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

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

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

182.32.-1-47

Occidental Chemical Corporation

Monitoring Plan
O&M Plan

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

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
Fencing/Access Control

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

182.06-3-20

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

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

182.06-3-21

Parcel

Engineering Control

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

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

182.07-1-14

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

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

182.32.-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

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

- a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the Engineering Control certification;
- b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

☒ ☐

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

- (a) The Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;
- (b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;
- (c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;
- (d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and
- (e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

☒ ☐

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

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

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. 932018

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1, 2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Joseph A Branch at 7601 Old Channel Trail
print name print business address
Montague NJ 09437

am certifying as OWNER (Owner or Remedial Party)

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


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

1-27-2026
Date

NT

EC CERTIFICATIONS

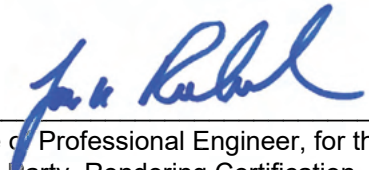
Box 7

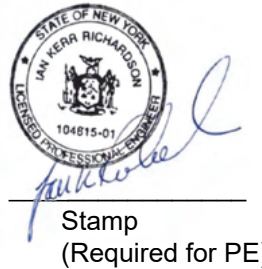
Professional Engineer Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Ian Richardson at B&B Engineers & Geologists of New York, P.C.
PO Box 351 Ransomeville, NY 14131,
print name print business address

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


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



February 6, 2026
Date

Enclosure 3
Periodic Review Report (PRR) General Guidance

- I. Executive Summary: (1/2-page or less)
 - A. Provide a brief summary of site, nature and extent of contamination, and remedial history.
 - B. Effectiveness of the Remedial Program - Provide overall conclusions regarding;
 1. progress made during the reporting period toward meeting the remedial objectives for the site
 2. the ultimate ability of the remedial program to achieve the remedial objectives for the site.
 - C. Compliance
 1. Identify any areas of non-compliance regarding the major elements of the Site Management Plan (SMP, i.e., the Institutional/Engineering Control (IC/EC) Plan, the Monitoring Plan, and the Operation & Maintenance (O&M) Plan).
 2. Propose steps to be taken and a schedule to correct any areas of non-compliance.
 - D. Recommendations
 1. recommend whether any changes to the SMP are needed
 2. recommend any changes to the frequency for submittal of PRRs (increase, decrease)
 3. recommend whether the requirements for discontinuing site management have been met.
- II. Site Overview (one page or less)
 - A. Describe the site location, boundaries (figure), significant features, surrounding area, and the nature and extent of contamination prior to site remediation.
 - B. Describe the chronology of the main features of the remedial program for the site, the components of the selected remedy, cleanup goals, site closure criteria, and any significant changes to the selected remedy that have been made since remedy selection.
- III. Evaluate Remedy Performance, Effectiveness, and Protectiveness

Using tables, graphs, charts and bulleted text to the extent practicable, describe the effectiveness of the remedy in achieving the remedial goals for the site. Base findings, recommendations, and conclusions on objective data. Evaluations and should be presented simply and concisely.
- IV. IC/EC Plan Compliance Report (if applicable)
 - A. IC/EC Requirements and Compliance
 1. Describe each control, its objective, and how performance of the control is evaluated.
 2. Summarize the status of each goal (whether it is fully in place and its effectiveness).
 3. Corrective Measures: describe steps proposed to address any deficiencies in ICECs.
 4. Conclusions and recommendations for changes.
 - B. IC/EC Certification
 1. The certification must be complete (even if there are IC/EC deficiencies), and certified by the appropriate party as set forth in a Department-approved certification form(s).
- V. Monitoring Plan Compliance Report (if applicable)
 - A. Components of the Monitoring Plan (tabular presentations preferred) - Describe the requirements of the monitoring plan by media (i.e., soil, groundwater, sediment, etc.) and by any remedial technologies being used at the site.
 - B. Summary of Monitoring Completed During Reporting Period - Describe the monitoring tasks actually completed during this PRR reporting period. Tables and/or figures should be used to show all data.
 - C. Comparisons with Remedial Objectives - Compare the results of all monitoring with the remedial objectives for the site. Include trend analyses where possible.
 - D. Monitoring Deficiencies - Describe any ways in which monitoring did not fully comply with the monitoring plan.
 - E. Conclusions and Recommendations for Changes - Provide overall conclusions regarding the monitoring completed and the resulting evaluations regarding remedial effectiveness.
- VI. Operation & Maintenance (O&M) Plan Compliance Report (if applicable)
 - A. Components of O&M Plan - Describe the requirements of the O&M plan including required activities, frequencies, recordkeeping, etc.
 - B. Summary of O&M Completed During Reporting Period - Describe the O&M tasks actually completed during this PRR reporting period.

- C. Evaluation of Remedial Systems - Based upon the results of the O&M activities completed, evaluated the ability of each component of the remedy subject to O&M requirements to perform as designed/expected.
- D. O&M Deficiencies - Identify any deficiencies in complying with the O&M plan during this PRR reporting period.
- E. Conclusions and Recommendations for Improvements - Provide an overall conclusion regarding O&M for the site and identify any suggested improvements requiring changes in the O&M Plan.

VII. Overall PRR Conclusions and Recommendations

- A. Compliance with SMP - For each component of the SMP (i.e., IC/EC, monitoring, O&M), summarize;
 - 1. whether all requirements of each plan were met during the reporting period
 - 2. any requirements not met
 - 3. proposed plans and a schedule for coming into full compliance.
- B. Performance and Effectiveness of the Remedy - Based upon your evaluation of the components of the SMP, form conclusions about the performance of each component and the ability of the remedy to achieve the remedial objectives for the site.
- C. Future PRR Submittals
 - 1. Recommend, with supporting justification, whether the frequency of the submittal of PRRs should be changed (either increased or decreased).
 - 2. If the requirements for site closure have been achieved, contact the Departments Project Manager for the site to determine what, if any, additional documentation is needed to support a decision to discontinue site management.

VIII. Additional Guidance

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

Appendix B

Monitoring Well Purge Records

Appendix B

North Tonawanda Plant Monitoring Key 2025

Well #	Station #	Blind	MS/MSD	DEC Split	Date
NP-22A	NP-22A	X			04/03/2025
NP-23	NP-23				Dry
NP-27	NP-27				Dry
NP-35	NP-35				Dry
NP-44	NP-44				Dry
NP-46	NP-46				04/03/2025
P-32A	P-32A		X		04/03/2025

Notes:

DEC	- New York State Department of Environmental Conservation
MS/MSD	- Matrix Spike/Matrix Spike Duplicate Sample
Blind	- Field duplicate (blind) sample
Dry	- Insufficient volume of water in well for sample collection

MS/MSD

Project Data: Project Name: DUREZ NT ANNUAL GW
Project Number: TR1045-32A-410
Well Data: Well No.: P-32A
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): _____

Date: 4/3/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 2"
Initial Depth to Water (m/ft): 7.48
Start Purge Time: 0948

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽¹⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
0957	100	7.51	0.03	14.66	4.65	5.15	5.04	7.86	142
1002	100	7.52	0.04	14.40	4.67	2.83	4.36	7.77	147
1007		7.52	0.04	14.17	4.67	1.95	4.28	7.76	149
1012	100	7.52	0.04	14.06	4.62	2.52	4.04	7.75	150

Sample ID: P-32A-0425

Sample Time: 1015

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The wall screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings $\pm 3\%$

[Signature]

Project Data: Project Name: DUREZ NT ANNUAL GW
Project Number: TR1045-32A-410
Well Data: Well No.: NP-22A
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): _____

Date: 4/3/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 2"
Initial Depth to Water (m/ft): 2.62
Start Purge Time: 1052

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽¹⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
1106	100	2.85	0.23	15.83	7.70	12.0	0.60	7.24	117
1111	100	2.90	0.28	15.08	7.53	12.5	0.54	7.20	106
1116		2.92	0.30	14.37	7.13	3.70	0.56	7.20	-4
1121	100	2.94	0.32	11.70	4.75	4.25	1.68	7.25	49
1126	100	2.95	0.33	12.34	3.93	3.12	1.68	7.27	67
1131		2.95	0.33	12.36	3.74	3.81	1.60	7.28	71
1136	100	2.96	0.34	12.34	3.77	4.47	1.56	7.27	78
1141	100	2.96	0.34	12.37	3.82	1.49	1.51	7.27	81

Sample ID: NP-22A-0425

Sample Time: 1145
TIME-1145

Notes: BLIND DUPLICATE - NP-70-0425

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The wall screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings $\pm 3\%$

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ANNUAL GW
Project Number: TR1045-32A-410
Well Data: Well No.: NP-46
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): _____

Date: 4/3/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.25"
Initial Depth to Water (m/ft): 2.92
Start Purge Time: 1248

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽¹⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
1255	100	2.98	0.06	11.15	0.918	13.8	7.57	7.29	149
1300	100	2.98	0.06	10.20	0.894	9.06	7.69	7.26	160
1305		2.98	0.06	9.55	0.860	4.79	7.69	7.28	169
1310	100	2.98	0.06	9.48	0.858	0.94	7.72	7.28	172
1315		2.98	0.06	9.14	0.858	1.58	7.78	7.28	175

Sample ID: NP-46-0425

Sample Time: 1320

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s
- For conductivity, the average value of three readings $\pm 3\%$

Sham Gardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ANNUAL GW
Project Number: TR1045-32A-410
Well Data: Well No.: NP-44
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): _____

Date: 4/3/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.25"
Initial Depth to Water (m/ft): _____
Start Purge Time: _____

[illegible]

Sample ID: _____

Sample Time: _____

Notes:

- (1) The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- (2) The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_a = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm. For Imperial units, $V_a = n \cdot (r^2) \cdot L (2.54)^3$, where r and L are in inches
- (3) The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- (4) Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s
- (5) For conductivity, the average value of three readings $\pm 3\%$

Shawn Hardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ANNUAL GW
 Project Number: TR1045-32A-410
 Well Data: Well No.: NP-27
 Constructed Well Depth (m/ft): _____
 Measured Well Depth (m/ft): _____

Date: 4/3/2025
 Personal: S GARDNER
 Well Diameter, D (cm/in): 1.5"
 Initial Depth to Water (m/ft): 5.88
 Start Purge Time: 0734

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽⁵⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
0738	100	7.47	1.59	17.83	0.722	18.2	1.05	6.74	-108
0743		8.86	2.98	17.02	0.675	12.8	1.18	7.14	-156
0745	WELL WENT DRY WHILE PURGING, NO MORE READINGS TAKEN. LET WELL RECOVER IF POSSIBLE THAN SAMPLE								FINAL W/L - 9.85
4/4/2025	CHECKED W/L IN WELL 0641 W/L 9.76 WELL DIDN'T RECOVER, NO SAMPLE TAKEN INSUFFICIENT VOLUME								

Sample ID: _____

Sample Time: _____

Notes:

- (1) The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- (2) The wall screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $r = D/2$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches.
- (3) The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- (4) Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing). No. of Well Screen Volumes Purged = V_p/V_s .
- (5) For conductivity, the average value of three readings $\pm 3\%$



Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ANNUAL GW
 Project Number: TR1045-32A-A10
 Well Data: Well No.: NP-35
 Constructed Well Depth (m/ft): _____
 Measured Well Depth (m/ft): 9.97

Date: 4/3/2025
 Personal: S GARDNER
 Well Diameter, D (cm/in): 1.5"
 Initial Depth to Water (m/ft): 6.32
 Start Purge Time: 0805

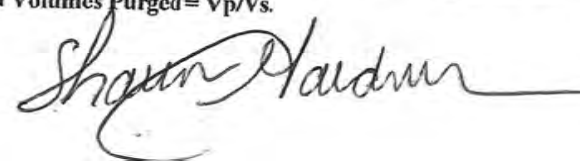
Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
0814	68	8.00	1.68	14.09	0.233	11.3	1.69	8.99	46
0819		8.95	2.63	13.75	0.224	22.1	1.64	9.25	43
0824	68	9.88	3.56	13.35	0.220	42.1	2.39	9.36	40
0825	WELL WENT DRY WHILE PURGING, NO MORE READINGS TAKEN DUE TO INSUFFICIENT VOLUME FINAL W/L - 9.96 LET WELL RECOVER IF POSSIBLE THAN SAMPLE								
4/4/2025	0053 CHECKED W/L IN WELL W/L-9.92 WELL DIDN'T RECOVER, NO SAMPLE TAKEN INSUFFICIENT VOLUME								

Sample ID: _____

Sample Time: _____

Notes:

- (1) The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- (2) The wall screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $r = D/2$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- (3) The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- (4) Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- (5) For conductivity, the average value of three readings $\pm 3\%$



Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ANNUAL GW
Project Number: TR1045-32A-410
Well Data: Well No.: NP-23
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): _____

Date: 4/3/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.25"
Initial Depth to Water (m/ft): 8.60
Start Purge Time: _____

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽¹⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
0841	INSUFFICIENT VOLUME FOR READINGS AND SAMPLING					FINAL W/L - 8.90			
	BOTTOM OF WELL 8.93			NO SAMPLE TAKEN					
4/4/2025	0706 CHECKED W/L IN WELL					W/L - 8.88 WELL DIDN'T RECOVER, NO SAMPLE			
	TAKEN, INSUFFICIENT VOLUME								

Sample ID: _____

Sample Time: _____

Notes:

- (1) The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- (2) The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r = D/2)$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- (3) The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- (4) Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- (5) For conductivity, the average value of three readings $\pm 3\%$

Shawn Gardner

Appendix C

Quality Assurance/Quality Control Report



Data Verification Report

April 30, 2025

To	Joe Branch [joseph_branch@oxy.com]	Project No.	11223794
Copy to	Dennis Hoyt [DHoyt@geosyntec.com]; Alden Wells [Alden.Wells@geosyntec.com] Alicia Ferber	DVR No.	92
From	Kristen Anders/cs	Contact No.	720-245-2750
Project Name	GSHDM: Durez NT Data Mgmt.	Email	Kristen.Anders@ghd.com
Subject	Analytical Results and Data Verification Annual Groundwater Sampling Glenn Springs Holdings, Inc. - Durez NT North Tonawanda, New York April 2025		

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

1. Introduction

This document details a data verification of analytical results for groundwater samples collected in support of the Annual Groundwater Sampling at the Durez NT site during April 2025. Samples were submitted to ALS Environmental located in Rochester, New York. A sample collection and analysis summary is presented in Table 1. The validated analytical results are summarized in Table 2. A summary of the analytical methodology is presented in Table 3.

Standard GHD report deliverables were submitted by the laboratory. The final results and supporting quality assurance/quality control (QA/QC) data were assessed. Evaluation of the data was based on information obtained from the chain of custody form, finished report form, method blank data, recovery data from surrogate spikes/laboratory control samples (LCS)/matrix spikes (MS), and field QA/QC samples.

The QA/QC criteria by which these data have been assessed are outlined in the analytical methods referenced in Table 3 and applicable guidance from the documents entitled:

1. "National Functional Guidelines for Organic Superfund Methods Data Review",
United States Environmental Protection Agency (USEPA) 540-R-20-005, November 2020.
2. "National Functional Guidelines for Inorganic Superfund Methods Data Review",
USEPA 542-R-20-006, November 2020.

These items will subsequently be referred to as the "Guidelines" in this report.

2. Sample Holding Time and Preservation

The sample holding time criteria for the analyses are summarized in Table 3. The sample chain of custody document and analytical report were used to determine sample holding times. All samples were analyzed within the required holding times.

All samples were properly preserved, delivered on ice, and stored by the laboratory at the required temperature (0-6°C).

3. Laboratory Method Blank Analyses

Method blanks are prepared from a purified matrix and analyzed with investigative samples to determine the existence and magnitude of sample contamination introduced during the analytical procedures.

For this study, laboratory method blanks were analyzed at a minimum frequency of one per analytical batch.

All method blank results were non-detect, indicating that laboratory contamination was not a factor for this investigation.

4. Surrogate Spike Recoveries - Organic Analyses

In accordance with the methods employed, all samples, blanks, and QC samples analyzed for organics are spiked with surrogate compounds prior to sample analysis. Surrogate recoveries provide a means to evaluate the effects of laboratory performance on individual sample matrices.

All samples submitted for volatile organic compound (VOC) determinations were spiked with the appropriate number of surrogate compounds prior to sample analysis.

Surrogate recoveries were assessed against laboratory control limits. All surrogate recoveries were within the laboratory control limits.

5. Laboratory Control Sample Analyses

LCS are prepared and analyzed as samples to assess the analytical efficiencies of the methods employed, independent of sample matrix effects.

For this study, LCS were analyzed at a minimum frequency of one per analytical batch.

Organic Analyses

The LCS contained all compounds of interest. All LCS recoveries were within the laboratory control limits, demonstrating acceptable analytical accuracy.

Inorganic Analyses

The LCS contained all analytes of interest. LCS recoveries were assessed per the "Guidelines" using the laboratory control limits. All LCS recoveries were within the control limits, demonstrating acceptable analytical accuracy.

6. Matrix Spike/Matrix Spike Duplicate (MS/MSD) Analyses

To evaluate the effects of sample matrices on the preparation process, measurement procedures, and accuracy of a particular analysis, samples are spiked with a known concentration of the analyte of concern and analyzed as MS/MSD samples. The relative percent difference (RPD) between the MS and MSD is used to assess analytical precision.

MS/MSD analyses were performed as specified in Table 1.

Organic Analyses

The MS/MSD samples were spiked with all compounds of interest. All percent recoveries and RPD values were within the laboratory control limits, demonstrating acceptable analytical accuracy and precision.

Inorganic Analyses

The MS/MSD samples were spiked with the analytes of interest, and the results were evaluated per the "Guidelines" using the laboratory control limits. All percent recoveries and RPD values were within the control limits, demonstrating acceptable analytical accuracy and precision.

7. Field QA/QC Samples

The field QA/QC consisted of one trip blank sample and one field duplicate sample set.

Trip Blank Sample Analysis

To evaluate contamination from sample collection, transportation, storage, and analytical activities, one trip blank sample was submitted to the laboratory for VOC analysis. All results were non-detect for the compounds of interest.

Field Duplicate Sample Analysis

To assess the analytical and sampling protocol precision, one field duplicate sample set was collected and submitted "blind" to the laboratory, as specified in Table 1. The RPDs associated with these duplicate samples must be less than 50 percent for water samples. If the reported concentration in either the investigative sample or its duplicate is less than five times the reporting limit (RL), the evaluation criterion is one times the RL value.

All field duplicate results met the above criteria, demonstrating acceptable sampling and analytical precision.

8. Analyte Reporting

The laboratory reported detected results down to the laboratory's sample-specific method detection limit (MDL) for each analyte. No positive analyte detections less than the RL but greater than the sample-specific MDL were reported. Non-detect results were presented as non-detect at the RL in Table 2.

9. Conclusion

Based on the assessment detailed in the foregoing, the data summarized in Table 2 are acceptable without qualification.

Regards,

A handwritten signature in cursive script, appearing to read "Kristen Anders".

Kristen Anders
Chemistry Data Validator/Analytical Coordinator

Table 1

Sample Collection and Analysis Summary
Annual Groundwater Sampling
Glenn Springs Holdings, Inc. - Durez NT
North Tonawanda, New York
April 2025

Sample Identification	Location	Matrix	Collection Date (mm/dd/yyyy)	Collection Time (hr:min)	Analysis/Parameters			Comments
					VOCs	Phenolics	TOC	
NP-22A-0425	NP-22A	Groundwater	04/03/2025	11:45	X	X	X	
NP-46-0425	NP-46	Groundwater	04/03/2025	13:20	X	X	X	MS/MSD
NP-70-0425	NP-22A	Groundwater	04/03/2025	11:45	X	X	X	FD(NP-22A-0425)
P-32A-0425	P-32A	Groundwater	04/03/2025	10:15	X	X	X	MS/MSD
NTANNUALTRIP-040325	-	Water	04/03/2025	-	X			Trip Blank

Notes:

FD	- Field Duplicate Sample of sample in parenthesis
MS/MSD	- Matrix Spike/Matrix Spike Duplicate
VOCs	- Volatile Organic Compounds
TOC	- Total Organic Carbon
-	- Not applicable

**Analytical Results Summary
Annual Groundwater Sampling
Glenn Springs Holdings, Inc. - Durez NT
North Tonawanda, New York
April 2025**

Location ID:	NP-22A	NP-22A	NP-46	P-32A
Sample Name:	NP-22A-0425	NP-70-0425	NP-46-0425	P-32A-0425
Sample Date:	04/03/2025	04/03/2025	04/03/2025	04/03/2025

Duplicate

Parameters	Unit				
Volatile Organic Compounds					
1,2,3-Trichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U
2-Chlorotoluene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U
Benzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U
Toluene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U
General Chemistry					
Phenolics (total)	mg/L	0.0050 U	0.0050 U	0.0050 U	0.0050 U
Total organic carbon (TOC)	mg/L	4.3	4.4	1.8	2.4

Note:

U - Not detected at the associated reporting limit

Table 3

**Analytical Methods
Annual Groundwater Sampling
Glenn Springs Holdings, Inc. - Durez NT
North Tonawanda, New York
April 2025**

Parameter	Method	Matrix	<u>Holding Time</u> Collection to Analysis (Days)
Volatile Organic Compounds	EPA 624.1	Groundwater	7
Phenolics	EPA 420.4	Groundwater	28
TOC	SM5310B	Groundwater	28

Note:

TOC - Total Organic Carbon

Method References:

SM - "Standard Methods for the Examination of Water and Wastewater",
18th Edition, 1992, with subsequent revisions.

EPA - "Methods for Chemical Analysis of Water and Waste," EPA-600/4-79-020,
revised March 1983, with subsequent revisions.

Appendix D

Historical Groundwater Chemistry

Monitoring Analytical Results

Appendix D
Table D.1

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-22/NP-22A

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Feb-84	Jun-93	Oct-93	Dec-94	Mar-95	Jun-95	Sep-95	Dec-95	Mar-96	Jun-96
Benzene	1	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
Toluene	5	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
Monochlorobenzene	5	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
2-Chlorotoluene	5	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
1,4-Dichlorobenzene	3	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
1,2-Dichlorobenzene	3	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
1,2,4-Trichlorobenzene	5	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
1,2,3-Trichlorobenzene	5	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
Total Targeted Organics	NA	µg/L	0	Dry	Dry	0	0	0	0/0	0/0	0/0	0/0
Total Recoverable Phenolics	1	µg/L	1	Dry	Dry	15	13	9	5 U/5 U	5 U/5 U	5 U/5 U	5 U/5 U
TOC	NA	mg/L	4	Dry	Dry	7.4	3.5	4.6 U	6.0/4.6	3.6/3.6	2.7/3.0	2.2/2.0
pH	6.5 - 8.5	S.U.	6.6	Dry	Dry	7.5	6.92	6.63	7.55	7.75	6.69	7.88
Conductivity	NA	mS/cm	1,500	Dry	Dry	758	682	804	944	536	906	568
Temperature	NA	Celsius	3	Dry	Dry	6.4	5.6	20.6	16.2	5.0	4.4	16.1
			Sep-96	Dec-96	Mar-97	Jun-97	Sep-97	Dec-97	Mar-98	Jun-98	Sep-98	Dec-98
Benzene	1	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
Toluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
Monochlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
2-Chlorotoluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
Total Targeted Organics	NA	µg/L	0	0	0	0	0	0	0	Dry	0	Dry
Total Recoverable Phenolics	1	µg/L	5 U	5 U	5 U	5 U	5 U	5 U	5 U	Dry	5 U	Dry
TOC	NA	mg/L	14	3.7 J	5.3	1.4	3.2	2.7	1.6	Dry	74.8	Dry
pH	6.5 - 8.5	S.U.	6.61	7.48	7.33	7.46	7.32	7.8	7.1	Dry	7.32	Dry
Conductivity	NA	mS/cm	680	890	900	860	1100	950	790	Dry	850	Dry
Temperature	NA	Celsius	15.5	7.9	5.1	14.4	13.8	7.2	5.0	Dry	16.2	Dry

Appendix D
Table D.1

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-22/NP-22A

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Mar-99	Jun-99	Sep-99	Dec-99	Apr-00	May-01	Apr-02	May-03	May-04	Jul-05
Benzene	1	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
Toluene	5	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
Monochlorobenzene	5	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
2-Chlorotoluene	5	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
Total Targeted Organics	-	µg/L	0	0	Dry	0	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	6 J	13	Dry	9	5 U	5 U	239	7.66	5 U	29
TOC	-	mg/L	2.6 U	2.78	Dry	2.28	2.9	5.1	4.6	3.8	4.9	3.7
pH	6.5 - 8.5	S.U.	4.68	6.24	Dry	6.4	5.82	6.31	7.46	6.58	6.99	7.08
Conductivity	-	mS/cm	600	800	Dry	8090	765	820	937	561	920	72.5
Temperature	-	Celsius	6.2	11.2	Dry	10	5.5	10.4	8	6.8	10.3	11

			Aug-06	Jun-07	Aug-08	Apr-09	May-10	May-11	Apr-12	Apr-13	Apr-14	Apr-15
Benzene	1	µg/L	1.0 U	1.0 U	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	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Monochlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
2-Chlorotoluene	5	µg/L	1.0 U	0.32 J	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	3	µg/L	1.0 U	1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 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	µg/L	1.0 U	1.0 U	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 Organics	NA	µg/L	0	0.32	0	0	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	10 U	10 U	10 U	10U	34	12	10 U	0.01	14	10 U
TOC	NA	mg/L	2.9	3.4	2.8	2.02	3.5	2.7	2.8	2.4	2.4	1.6
pH	6.5 - 8.5	S.U.	6.96	6.82	6.78	7.89	8.14	6.95	5.73	7.28	7.28	7.05
Conductivity	NA	mS/cm	712	960	1041	10180	1030	902	944	1.242	1.242	0.78
Temperature	NA	Celsius	15.4	10.3	16.1	9.33	9.98	9.51	9.87	7.84	7.84	9.8

Appendix D
Table D.1

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-22/NP-22A

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Apr-16	Apr-17	Apr-18	Apr-19	May-20	Apr-21	May-22	Apr-23	Apr-24	Apr-25
Benzene	1	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	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	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
Monochlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
2-Chlorotoluene	5	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	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 Organics	NA	µg/L	0	0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Total Recoverable Phenolics	1	µg/L	5.0 U	5.0 U	5.0 U/5.0 U	5.0 U/5.0 U	5.0 U/5.0 U	5.0 U/5.0 U	5.0 U/5.0 U	5.0 U/5.0 U	5.0 U/5.0 U	5.0 U/5.0 U
TOC	NA	mg/L	10.5	3.3	2.7/2.6	3.0/3.0	3.5/3.9	2.0/2.3	47.3/3.9	1.0/4.1	4.5/4.5	4.3/4.4
pH	6.5 - 8.5	S.U.	6.98	6.28	6.27	6.85	8.31	7.18	7.01	6.76	6.70	7.27
Conductivity	NA	mS/cm	0.94	0.97	1.19	1.05	1.71	5.05	4.13	4.19	5.62	3.82
Temperature	NA	Celsius	6.3	7.6	3.9	9.5	12.9	8.1	11.7	7.2	10.77	12.37

Notes:

- (1) - Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgment; except analyses for Total Recoverable Phenolics were reported in Phenols in February 1984
- (2) - Groundwater standards are New York State Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998
- Interceptor Trench operation began in October 1990; first full month of operation was November 1990; represented by dashed vertical line above
- NP-22A was installed in November 1993, approximately 10 feet from the former location of NP-22
- Dry - Dry well or insufficient sample for analyses
- J - Estimated at associated value
- NA - Not analyzed or not available
- S.U. - Standard Unit
- TOC - Total Organic Carbon
- U - Not detected at associated value
- µg/L - Micrograms per liter
- mS/cm - Microsiemens per centimeter
- Concentration exceeds New York State water quality standards

Appendix D
Table D.2

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-23

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Sum-83	Jan-89	Dec-93	Mar-94	Jun-94	Sep-94	Dec-94	Mar-95	Jun-95	Sep-95
Benzene	1	µg/L	9	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
Toluene	5	µg/L	U	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
Monochlorobenzene	5	µg/L	U	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
2-Chlorotoluene	5	µg/L	2	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
1,4-Dichlorobenzene	3	µg/L	U	4	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
1,2-Dichlorobenzene	3	µg/L	U	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
1,2,4-Trichlorobenzene	5	µg/L	3	1	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
1,2,3-Trichlorobenzene	5	µg/L	U	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
Total Targeted Organics	-	µg/L	14	5	0	0	0	0	0	0	0	Dry
Total Recoverable Phenolics	1	µg/L	1	NA	5 U	5 U	27	10	2	5 U	5 U	Dry
TOC	-	mg/L	1	NA	3	6.7	3.8	8.5	4.5	2.8	1	Dry
pH	6.5 - 8.5	S.U.	7	6.5	8.25	7.68	7.7	7.45	7.75	7	6.71	Dry
Conductivity	-	mS/cm	610	3100	486	1440	740	870	851	356	430	Dry
Temperature	-	Celsius	20	5.7	7.5	8.8	19.3	12.1	7.8	6	21.3	Dry
			Dec-95	Mar-96	Jun-96	Sep-96	Dec-96	Mar-97	Jun-97	Sep-97	Dec-97	Mar-98
Benzene	1	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Toluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Monochlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
2-Chlorotoluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Total Targeted Organics	-	µg/L	0	0	0	0	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U
TOC	-	mg/L	5.2	2.3	2.1	4.6	3.8 J	41	1.1	8.8	3.9	2.0
pH	6.5 - 8.5	S.U.	7.56	6.53	7.57	6.53	7.17	7.82	7.47	7.53	7.11	7.30
Conductivity	-	mS/cm	480	770	388	480	896	425	400	820	600	1055
Temperature	-	Celsius	5.4	3.9	16.7	16.4	7.9	5.0	15.1	16.2	8.8	6.8

Appendix D
Table D.2

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-23

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Jun-98	Sep-98	Dec-98	Mar-99	Jun-99	Sep-99	Dec-99	Apr-00	May-01	Apr-02
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
TOC	-	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Conductivity	NA	mS/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
			May-03	May-04	Jul-05	Aug-06	Jun-07	Aug-08	Apr-09	May-10	May-11	Apr-12
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	0	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	10 U	Dry	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	18.6	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	7.74	Dry	Dry	Dry	Dry
Conductivity	NA	mS/cm	Dry	Dry	Dry	Dry	Dry	443	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	20.8	Dry	Dry	Dry	Dry

Appendix D
Table D.2

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-23

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Apr-13	Apr-14	Apr-15	Apr-16	Apr-17	Apr-18	Apr-19	May-20	Apr-21	May-22
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Conductivity	NA	mS/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
			Apr-23	Apr-24	Apr-25							
Benzene	1	µg/L	Dry	Dry	Dry							
Toluene	5	µg/L	Dry	Dry	Dry							
Monochlorobenzene	5	µg/L	Dry	Dry	Dry							
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry							
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry							
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry							
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry							
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry							
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry							
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry							
TOC	NA	mg/L	Dry	Dry	Dry							
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry							
Conductivity	NA	mS/cm	Dry	Dry	Dry							
Temperature	NA	Celsius	Dry	Dry	Dry							

Notes:

(1)

- Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgment; except analyses for Total Recoverable Phenolics were reported as Phenols in February 1984

(2)

- Groundwater standards are New York State Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998

- Interceptor Trench operation began in October 1990; first full month of operation was November 1990

Dry

- Dry well or insufficient sample for analyses

J

- Estimated at associated value

I

- Data unavailable

NA

- Not analyzed or not available

S.U.

- Standard Unit

TOC

- Total Organic Carbon

U

- Not detected at associated value

µg/L

- Micrograms per liter

mS/cm

- Microsiemens per centimeter

- Concentration exceeds New York State water quality standards

Appendix D
Table D.3

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-27

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units										
			Sum-83	Dec-93	Mar-94	Jun-94	Sep-94	Dec-94	Mar-95	Jun-95	Sep-95	Dec-95
Benzene	1	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
Toluene	5	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
Monochlorobenzene	5	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
2-Chlorotoluene	5	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
1,4-Dichlorobenzene	3	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
1,2-Dichlorobenzene	3	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
1,2,4-Trichlorobenzene	5	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
1,2,3-Trichlorobenzene	5	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
Total Targeted Organics	NA	µg/L	0	0	0	0	Dry	0	0	0	Dry	0
Total Recoverable Phenolics	1	µg/L	14 U	3	5 U	5	Dry	6	5 U	5 U	Dry	5 U
TOC	NA	mg/L	4	2.4	11	2.9	Dry	5	1.6	2.6	Dry	3.4
pH	6.5 - 8.5	S.U.	6.8	7.58	7.48	6.96	Dry	7.43	7.46	6.41	Dry	7.52
Conductivity	NA	mS/cm	1,570	805	1890	840	Dry	716	546	631	Dry	555
Temperature	NA	Celsius	15	7.4	8.6	17.5	Dry	7.6	5.7	20.2	Dry	4.1
			Mar-96	Jun-96	Sep-96	Dec-96	Mar-97	Jun-97	Sep-97	Dec-97	Mar-98	Jun-98
Benzene	1	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
Toluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
Monochlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
2-Chlorotoluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
Total Targeted Organics	NA	µg/L	0	0	0	0	0	0	0	0	0	Dry
Total Recoverable Phenolics	1	µg/L	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	Dry
TOC	NA	mg/L	1.2	1.1	2.9	4.2 J	3.7	1 U	2.4	3.0	1.3	Dry
pH	6.5 - 8.5	S.U.	6.85	7.37	6.94	7.34	7.42	8.01	7.27	7.13	7.28	Dry
Conductivity	NA	mS/cm	780	600	630	990	920	910	1000	850	820	Dry
Temperature	NA	Celsius	3.9	16.9	17.8	8.7	4.5	16.1	15.4	6.2	5.9	Dry

Appendix D Table D.3 Groundwater Chemistry Monitoring Analytical Results Durez Interceptor Trench North Tonawanda, New York NP-27												
Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Sep-98	Dec-98	Mar-99	Jun-99	Sep-99	Dec-99	Apr-00	May-01	Apr-02	May-03
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Conductivity	NA	mS/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
			May-04	Jul-05	Aug-06	Jun-07	Aug-08	Apr-09	May-10	May-11	Apr-12	Apr-13
Benzene	1	µg/L	Dry	Dry	Dry	Dry	1.0 U	Dry	1.0 U	Dry	1.0 U	1.0 U
Toluene	5	µg/L	Dry	Dry	Dry	Dry	1.0 U	Dry	1.0 U	Dry	1.0 U	1.0 U
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	1.0 U	Dry	1.0 U	Dry	1.0 U	1.0 U
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	6.0 U	Dry	1.0 U	Dry	1.0 U	1.0 U
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	1.0 U	Dry	1.0 U	Dry	1.0 U	1.0 U
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	1.0 U	Dry	1.0 U	Dry	1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	1.0 U	Dry	1.0 U	Dry	1.1	1.0 U
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	1.0 U	Dry	1.0 U	Dry	1.0 U	1.0 U
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	0	Dry	0	Dry	1.1	0
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	12 U	Dry	25U	Dry	10 U	0.01
TOC	NA	mg/L	Dry	Dry	Dry	Dry	19.9	Dry	1.5	Dry	1.9	9.4
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	6.74	Dry	NA	Dry	7.05	7.85
Conductivity	NA	mS/cm	Dry	Dry	Dry	Dry	930	Dry	NA	Dry	504	0.627
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	19.2	Dry	NA	Dry	11.52	6.9

Appendix D
Table D.3

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-27

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Apr-14	Apr-15	Apr-16	Apr-17	Apr-18	Apr-19	May-20	Apr-21	May-22	Apr-23
Benzene	1	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
Toluene	5	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
Monochlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
2-Chlorotoluene	5	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
1,4-Dichlorobenzene	3	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
1,2-Dichlorobenzene	3	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
1,2,4-Trichlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
1,2,3-Trichlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
Total Targeted Organics	NA	µg/L	0	0	0	0	0	0	Dry	0	0	Dry
Total Recoverable Phenolics	1	µg/L	3.1 J	10 U	5.0 U	5.0 U	5.0 U	5.0 U	Dry	5.0 U	5.0 U	Dry
TOC	NA	mg/L	1.6	1.0	11.3	2.4	2.5	1.6	Dry	2.0	4.1	Dry
pH	6.5 - 8.5	S.U.	7.85	7.74	7.62	6.62	7.93	6.84	Dry	7.69	8.18	Dry
Conductivity	NA	mS/cm	0.627	0.647	0.556	0.69	0.487	0.581	Dry	0.85	0.64	Dry
Temperature	NA	Celsius	6.9	6.9	5.9	6.8	5.3	7.3	Dry	7.6	10.3	Dry
			Apr-24	Apr-25								
Benzene	1	µg/L	Dry	Dry								
Toluene	5	µg/L	Dry	Dry								
Monochlorobenzene	5	µg/L	Dry	Dry								
2-Chlorotoluene	5	µg/L	Dry	Dry								
1,4-Dichlorobenzene	3	µg/L	Dry	Dry								
1,2-Dichlorobenzene	3	µg/L	Dry	Dry								
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry								
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry								
Total Targeted Organics	NA	µg/L	Dry	Dry								
Total Recoverable Phenolics	1	µg/L	Dry	Dry								
TOC	NA	mg/L	Dry	Dry								
pH	6.5 - 8.5	S.U.	Dry	Dry								
Conductivity	NA	mS/cm	Dry	Dry								
Temperature	NA	Celsius	Dry	Dry								

- Notes:
- (1)

- Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgment; except analyses for Total Recoverable Phenolics were reported as Phenols in February 1984
- (2)

- Groundwater standards are New York State Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998
- Interceptor Trench operation began in October 1990; first full month of operation was November 1990
- Dry

- Dry well or insufficient sample for analyses
- J

- Estimated at associated value
- NA

- Not analyzed or not available
- S.U.

- Standard Unit
- TOC

- Total Organic Carbon
- U

- Not detected at associated value
- µg/L

- Micrograms per liter
- mS/cm

- Microsiemens per centimeter
- Concentration exceeds New York State water quality standards

Appendix D
Table D.4

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
P32A

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Sum-83	Jan-89	Jun-93	Oct-93	Jun-94	Sep-94	Dec-94	Mar-95	Jun-95	Sep-95
Benzene	1	µg/L	7	1	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U
Toluene	5	µg/L	U	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U
Monochlorobenzene	5	µg/L	310	25	5	10	1 U	1 U	1 U	5 U	1 U	1 U
2-Chlorotoluene	5	µg/L	2	U	2	1 U	1 U	1 U	1 U	5 U	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	120	7	3	12	1 U	1 U	1 U	5 U	1 U	3 U
1,2-Dichlorobenzene	3	µg/L	82	10	3	3	1 U	1 U	1 U	5 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	U	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U
1,2,3-Trichlorobenzene	5	µg/L	U	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U
Total Targeted Organics	NA	µg/L	521	43	13	25	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	14 U	30	1	1	5	19	16	5 U	5 U	5 U
TOC	NA	mg/L	4	28	1	1	3.8	11	9.3	3.4	4.7	3.4
pH	6.5 - 8.5	S.U.	7.1	6.2	1	1	7.04	7.1	7.48	6.82	6.2	7.29
Conductivity	NA	mS/cm	1,940	100000	1	1	8120	759	6150	3830	951	12740
Temperature	NA	Celsius	20	12	1	1	20.2	6.3	10.3	8.2	18.6	20.2
			Dec-95	Mar-96	Jun-96	Sep-96	Dec-96	Mar-97	Jun-97	Sep-97	Dec-97	Mar-98
Benzene	1	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Toluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Monochlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
2-Chlorotoluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Total Targeted Organics	NA	µg/L	0	0	0	0	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U
TOC	NA	mg/L	3.4	5.4	3.4	5.7	5.2	6.2	1.9	2.5	3.9	2.3
pH	6.5 - 8.5	S.U.	7.43	6.54	7.38	6.72	6.84	7.11	7.27	7.04	6.79	7.30
Conductivity	NA	mS/cm	5,310	4910	2460	2810	8120	3000	6200	4700	6200	5200
Temperature	NA	Celsius	6.9	4.4	16.1	16.9	11.3	6.2	15.1	17.7	10.9	7.2

Appendix D
Table D.4

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
P32A

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Jun-98	Sep-98	Dec-98	Mar-99	Jun-99	Sep-99	Dec-99	Apr-00	May-01	Apr-02
Benzene	1	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Toluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Monochlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
2-Chlorotoluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Total Targeted Organics	NA	µg/L	0	0	0	0	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	5 U	5 U	5 U	5 U	28	5	10	5 U	5 U	185
TOC	NA	mg/L	3.7	76.8	4	3.0 U	3.23	1 U.0	4.39	3	4.2	2.7
pH	6.5 - 8.5	S.U.	7.34	7.18	6.9	6.12	6.8	-	6.86	6.78	6.97	7.65
Conductivity	NA	mS/cm	4,000	4300	4000	3000	3500	3670	3570	3700	2520	3270
Temperature	NA	Celsius	16.7	17.1	14.1	5.5	16.9	20	12.8	6.5	13.5	9.3
			May-03	May-04	Jul-05	Aug-06	Jun-07	Aug-08	Apr-09	May-10	May-11	Apr-12
Benzene	1	µg/L	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
Toluene	5	µg/L	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
Monochlorobenzene	5	µg/L	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
2-Chlorotoluene	5	µg/L	1.00 U	1.00 U	1.0 U	1.0 U	0.33 J	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U
1,4-Dichlorobenzene	3	µg/L	1.00 U	1.00 U	1.0 U	1.0 U	0.36 J	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U
1,2-Dichlorobenzene	3	µg/L	1.00 U	1.00 U	1.0 U	1.0 U	0.23 J	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U
1,2,4-Trichlorobenzene	5	µg/L	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
1,2,3-Trichlorobenzene	5	µg/L	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
Total Targeted Organics	NA	µg/L	0	0	0	0	0.92	0	0	0	0	0/0
Total Recoverable Phenolics	1	µg/L	5 U	5 U	10 U	10 U	10 U	10 U	10 U	26 U	79	10 U/10 U
TOC	NA	mg/L	3.6	4.3	3.3	2.2	3.9	3.1	2.31	2.5	2	2.0/1.9
pH	6.5 - 8.5	S.U.	7.35	7.17	7.28	7.42	6.87	6.82	8.12	NA	7.23	6.96
Conductivity	NA	mS/cm	3570	4290	3110	2270	3960	4180	3210	NA	5440	3790
Temperature	NA	Celsius	8.3	12	17.1	21.5	13.1	19.2	11.16	NA	10.44	11.58

Appendix D
Table D.4

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
P32A

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Apr-13	Apr-14	Apr-15	Apr-16	Apr-17	Apr-18	Apr-19	May-20	Apr-21	May-22
Benzene	1	µg/L	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
Toluene	5	µg/L	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
Monochlorobenzene	5	µg/L	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
2-Chlorotoluene	5	µg/L	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
1,4-Dichlorobenzene	3	µg/L	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
1,2-Dichlorobenzene	3	µg/L	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
1,2,4-Trichlorobenzene	5	µg/L	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
1,2,3-Trichlorobenzene	5	µg/L	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
Total Targeted Organics	NA	µg/L	0	0	0	0	0/0	0	0	0	1.0 U	0
Total Recoverable Phenolics	1	µg/L	0.01	4.1 J	10 U	3.5 J	5 U/5 U	5.0 U	5.0 U	5.0 U	1.0 U	5.0 U
TOC	NA	mg/L	2.3	2.4	1.6	9.4	2.6/2.6	2.6	2.2	2.3	2.2	1.7
pH	6.5 - 8.5	S.U.	7.42	7.28	7.41	7.05	6.76	5.57	6.06	8.61	8.61	7.31
Conductivity	NA	mS/cm	3	1	2.9	3.18	3.12	4.88	4.32	4.14	1.0/4.5	4.4
Temperature	NA	Celsius	9.27	7.84	10.2	7.9	8.3	6.5	10.4	16.0	9.9	13.3
			Apr-23	Apr-24	Apr-25							
Benzene	1	µg/L	1.00 U	1.0 U	1.0 U							
Toluene	5	µg/L	1.00 U	1.0 U	1.0 U							
Monochlorobenzene	5	µg/L	1.00 U	1.0 U	1.0 U							
2-Chlorotoluene	5	µg/L	1.00 U	1.0 U	1.0 U							
1,4-Dichlorobenzene	3	µg/L	1.00 U	1.0 U	1.0 U							
1,2-Dichlorobenzene	3	µg/L	1.00 U	1.0 U	1.0 U							
1,2,4-Trichlorobenzene	5	µg/L	1.00 U	1.0 U	1.0 U							
1,2,3-Trichlorobenzene	5	µg/L	1.00 U	1.0 U	1.0 U							
Total Targeted Organics	NA	µg/L	0	0	0							
Total Recoverable Phenolics	1	µg/L	5.00 U	5.0 U	5.0 U							
TOC	NA	mg/L	2.6	1.9	2.4							
pH	6.5 - 8.5	S.U.	7.28	7.16	7.75							
Conductivity	NA	mS/cm	4	3.260	4.62							
Temperature	NA	Celsius	10.8	15.18	14.06							

- Notes:
- (1)

- Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgment; except analyses for Total Recoverable Phenolics were reported as Phenols in February 1984
- (2)

- Groundwater standards are New York State Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998
- Interceptor Trench operation began in October 1990; first full month of operation was November 1990
- Dry

- Dry well or insufficient sample for analyses
- J

- Estimated at associated value
- NA

- Not analyzed or not available
- S.U.

- Standard Unit
- TOC

- Total Organic Carbon
- U

- Not detected at associated value
- µg/L

- Micrograms per liter
- mS/cm

- Microsiemens per centimeter
- Concentration exceeds New York State water quality standards

Appendix D
Table D.5

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-35

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units										
			Sum-83	Dec-93	Mar-94	Jun-94	Sep-94	Dec-94	Mar-95	Jun-95	Sep-95	Dec-95
Benzene	1	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
Toluene	5	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
Monochlorobenzene	5	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
2-Chlorotoluene	5	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
1,2-Dichlorobenzene	3	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
1,2,3-Trichlorobenzene	5	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
Total Targeted Organics	NA	µg/L	0	0	0	0	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	14 U	11	5 U	80	14	12	10	5 U	5 U	5 U
TOC	NA	mg/L	4	4	11	5.5	7	10	4.4	11	10.6	8.6
pH	6.5 - 8.5	S.U.	6.9	7.27	8.2	7.08	6.45	7.34	7.02	6.94	7.46	7.42
Conductivity	NA	umhos/cm	930	876	1590	920	740	825	499	694	905	696
Temperature	NA	Celsius	21	8	8.1	17.9	20	6.1	5.9	18.3	21.05	4.9
			Mar-96	Jun-96	Sep-96	Dec-96	Mar-97	Jun-97	Sep-97	Dec-97	Mar-98	Jun-84
Benzene	1	µg/L	1 U	1 U	1 U/1 U	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
Toluene	5	µg/L	1 U	1 U	1.9/1.6 J	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
Monochlorobenzene	5	µg/L	1 U	1 U	1 U/1 U	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
2-Chlorotoluene	5	µg/L	1 U	1 U	1 U/1 U	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	1 U/1 U	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	1 U/1 U	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	1 U/1 U	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	1 U/1 U	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
Total Targeted Organics	NA	µg/L	0	0	1.9/1.6 J	0	0	0	0/0	0	0/0	Dry
Total Recoverable Phenolics	1	µg/L	5 U	5 U	5 U	5 U	5 U	5 U	5 U/5 U	5 U	5 U/5 U	Dry
TOC	NA	mg/L	2.8	2.4	4.4	4.2 J	6.2	1.6/1.7	4.0/4.2	4.2	2.5/2.4	Dry
pH	6.5 - 8.5	S.U.	6.77	7.86	6.93	7.71	7.47	7.92	7.22	8.66	7.20	Dry
Conductivity	NA	umhos/cm	790	596	680	1000	1000	900	1100	1000	890	Dry
Temperature	NA	Celsius	3.9	20.5	17.3	7.9	4.7	18.0	16.8	5.3	5.9	Dry

Appendix D
Table D.5

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-35

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Sep-98	Dec-98	Mar-99	Jun-99	Sep-99	Dec-99	Apr-00	May-01	Apr-02	May-03
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	1 U	1 U	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1.5	1 U	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1 U	1 U	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1 U	1 U	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	1 U	1 U	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	1 U	1 U	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1 U	1 U	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1 U	1 U	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	1.5	0	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	69	5 U	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	3.52	3.1	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	6.68	6.3	Dry	Dry	Dry
Conductivity	NA	umhos/cm	Dry	Dry	Dry	Dry	Dry	6863	564	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	9.8	6.7	Dry	Dry	Dry
			May-04	Jul-05	Aug-06	Jun-07	Aug-08	Apr-09	May-10	May-11	Apr-12	Apr-13
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Conductivity	NA	umhos/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry

Appendix D
Table D.5

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-35

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Apr-14	Apr-15	Apr-16	Apr-17	Apr-18	Apr-19	May-20	Apr-21	May-22	Apr-23
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Conductivity	NA	umhos/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
			Apr-24	Apr-25								
Benzene	1	µg/L	Dry	Dry								
Toluene	5	µg/L	Dry	Dry								
Monochlorobenzene	5	µg/L	Dry	Dry								
2-Chlorotoluene	5	µg/L	Dry	Dry								
1,4-Dichlorobenzene	3	µg/L	Dry	Dry								
1,2-Dichlorobenzene	3	µg/L	Dry	Dry								
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry								
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry								
Total Targeted Organics	NA	µg/L	Dry	Dry								
Total Recoverable Phenolics	1	µg/L	Dry	Dry								
TOC	NA	mg/L	Dry	Dry								
pH	6.5 - 8.5	S.U.	Dry	Dry								
Conductivity	NA	umhos/cm	Dry	Dry								
Temperature	NA	Celsius	Dry	Dry								

Notes:

- (1)

- Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgment; except analyses for Total Recoverable Phenolics were reported as Phenols in February 1984
- (2)

- Groundwater standards are New York State Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998
- Interceptor Trench operation began in October 1990; first full month of operation was November 1990
- Dry

- Dry well or insufficient sample for analyses
- J

- Estimated at associated value
- NA

- Not analyzed or not available
- S.U.

- Standard Unit
- TOC

- Total Organic Carbon
- U

- Not detected at associated value
- µg/L

- Micrograms per liter
- mS/cm

- Microsiemens per centimeter
- Concentration exceeds New York State water quality standards

Appendix D
Table D.6

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-44

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units										
			May-85	Dec-85	Dec-88	Jun-93	Oct-93	Dec-93	Mar-94	Jun-94	Sep-94	Dec-94
Benzene	1	µg/L	700	70	920	1 U	Dry	Dry	Dry	1 U	Dry	1 U
Toluene	5	µg/L	13	2	6	1 U	Dry	Dry	Dry	1 U	Dry	1 U
Monochlorobenzene	5	µg/L	9500	2500	14000	1 U	Dry	Dry	Dry	1 U	Dry	1 U
2-Chlorotoluene	5	µg/L	U	1	3	1 U	Dry	Dry	Dry	1 U	Dry	1 U
1,4-Dichlorobenzene	3	µg/L	2700	2900	2900	1 U	Dry	Dry	Dry	1 U	Dry	1 U
1,2-Dichlorobenzene	3	µg/L	700	990	1100	1 U	Dry	Dry	Dry	1 U	Dry	1 U
1,2,4-Trichlorobenzene	5	µg/L	31	48	39	1 U	Dry	Dry	Dry	1 U	Dry	1 U
1,2,3-Trichlorobenzene	5	µg/L	15	14	2	1 U	Dry	Dry	Dry	1 U	Dry	1 U
Total Targeted Organics	NA	µg/L	13659	6525	18970	0	Dry	Dry	Dry	0	Dry	0
Total Recoverable Phenolics	1	µg/L	1750	4650	600	NA	Dry	Dry	Dry	24	Dry	5
TOC	NA	mg/L	131	33	19	9.4	Dry	Dry	Dry	8.8	Dry	12
pH	6.5 - 8.5	S.U.	7.7	6.8	6.9	7.01	Dry	Dry	Dry	1	Dry	7.15
Conductivity	NA	umhos/cm	140	1430	NA	885	Dry	Dry	Dry	1	Dry	1234
Temperature	NA	Celsius	19	10	NA	15	Dry	Dry	Dry	1	Dry	6.5
			Mar-95	Jun-95	Sep-95	Dec-95	Mar-96	Jun-96	Sep-96	Dec-96	Mar-97	Jun-97
Benzene	1	µg/L	5 U	1 U	Dry	1 U	1 U	0.22 J	1 U	1 U	1 U	1 U
Toluene	5	µg/L	5 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Monochlorobenzene	5	µg/L	5 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1 U	1.9
2-Chlorotoluene	5	µg/L	5 U	1 U	Dry	1 U	1 U	1.4	1 U	1 U	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	5 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2-Dichlorobenzene	3	µg/L	5 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	5 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,3-Trichlorobenzene	5	µg/L	5 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Total Targeted Organics	NA	µg/L	0	0	Dry	0	0	1.6 J	0	0	0	0
Total Recoverable Phenolics	1	µg/L	17	11	Dry	5 U	5 U	5 U	5 U	5 U	5 U	5 U
TOC	NA	mg/L	5.8	7.1	Dry	9.1	2.4	2.2	6.2	3.2	6.1	1.3
pH	6.5 - 8.5	S.U.	6.06	6.3	Dry	7.56	7.14	8.01	6.63	7.38	7.12	7.73
Conductivity	NA	umhos/cm	1234	868	Dry	1080	965	832	1020	1200	1000	980
Temperature	NA	Celsius	6.5	20.2	Dry	4.3	3.3	20	16.2	7.2	3.5	19.0

Appendix D
Table D.6

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-44

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Sep-97	Dec-97	Mar-98	Jun-98	Sep-98	Dec-98	Mar-99	Jun-99	Sep-99	Dec-99
Benzene	1	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	0/0	0	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	5 U/5 U	5 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
TOC	NA	mg/L	Dry	3.4/3.6	1.8	Dry	Dry	Dry	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	7.18	7.10	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Conductivity	NA	umhos/cm	Dry	1000	1000	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	7.0	3.5	Dry	Dry	Dry	Dry	Dry	Dry	Dry
			Apr-00	May-01	Apr-02	May-03	May-04	Jul-05	Aug-06	Jun-07	Aug-08	Apr-09
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	0.26 J	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	0.26 J	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	0.14 J	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	0.66	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	NA	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	NA	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	6.52	Dry
Conductivity	NA	umhos/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	443	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	23.1	Dry

Appendix D Table D.6 Groundwater Chemistry Monitoring Analytical Results Durez Interceptor Trench North Tonawanda, New York NP-44												
Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units										
			May-10	May-11	Apr-12	Apr-13	Apr-14	Apr-15	Apr-16	Apr-17	Apr-18	Apr-19
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Conductivity	NA	umhos/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
			May-20	Apr-21	May-22	Apr-23	Apr-24	Apr-25				
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry				
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry				
Conductivity	NA	umhos/cm	Dry	Dry	Dry	Dry	Dry	Dry				
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry				
Notes:												
⁽¹⁾ - Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgment; except analyses for Total Recoverable Phenolics were reported as Phenols in February 1984												
⁽²⁾ - Groundwater standards are New York State Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998												
- Interceptor Trench operation began in October 1990; first full month of operation was November 1990												
Dry - Dry well or insufficient sample for analyses												
J - Estimated at associated value												
NA - Not analyzed or not available												
S.U. - Standard Unit												
TOC - Total Organic Carbon												
U - Not detected at associated value												
µg/L - Micrograms per liter												
mS/cm - Microsiemens per centimeter												
- Concentration exceeds New York State water quality standards												

Appendix D
Table D.7

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-46

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Dec-85	Jan-89	Dec-93	Mar-94	Jun-94	Sep-94	Dec-94	Mar-95	Jun-95	Sep-95
Benzene	1	µg/L	U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
Toluene	5	µg/L	10 U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
Monochlorobenzene	5	µg/L	U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
2-Chlorotoluene	5	µg/L	U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
1,4-Dichlorobenzene	3	µg/L	U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
1,2-Dichlorobenzene	3	µg/L	U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
1,2,4-Trichlorobenzene	5	µg/L	U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
1,2,3-Trichlorobenzene	5	µg/L	U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
Total Targeted Organics	NA	µg/L	0	0	0	0	0	Dry	0	0	0	Dry
Total Recoverable Phenolics	1	µg/L	500 U	NA	6	5 U	5	Dry	5	5 U	5 U	Dry
TOC	NA	mg/L	10 U	NA	2.1	7.8	3.1	Dry	11	3.6	3.1	Dry
pH	6.5 - 8.5	S.U.	6	6.8	7.18	7.32	7.27	Dry	7.13	7	6.58	Dry
Conductivity	NA	mS/cm	1,045	11000	912	2030	990	Dry	927	650	810	Dry
Temperature	NA	Celsius	14	NA	8.3	8.1	17.4	Dry	6.9	5	16.9	Dry
			Dec-95	Mar-96	Jun-96	Sep-96	Dec-96	Mar-97	Jun-97	Sep-97	Dec-97	Mar-98
Benzene	1	µg/L	1 U	1 U	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
Toluene	5	µg/L	1 U	1 U	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
Monochlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
2-Chlorotoluene	5	µg/L	1 U	1 U	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	1 U	1.3	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
1,2,3-Trichlorobenzene	5	µg/L	1 U	1.2	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
Total Targeted Organics	NA	µg/L	0	2.5	0	0	0/0	0/0	0/0	Dry	0	0
Total Recoverable Phenolics	1	µg/L	5 U	5 U	5 U	5 U	5 U/5 U	5 U/5 U	5 U/5 U	Dry	5 U	5 U
TOC	NA	mg/L	3.4	1.4	1.7	2.8	3.2 J/3.7 J	5.8 J/3.6 J	1 U	Dry	2.3	1.2
pH	6.5 - 8.5	S.U.	7.71	6.95	7.52	6.28	7.09	7.06	7.00	Dry	7.2	6.85
Conductivity	NA	mS/cm	724	870	786	830	1100	1000	1000	Dry	1000	990
Temperature	NA	Celsius	5.3	3.9	18.9	14.9	7.2	3.7	12.5	Dry	6.3	4.5

Appendix D
Table D.7

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-46

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Jun-98	Sep-98	Dec-98	Mar-99	Jun-99	Sep-99	Dec-99	Apr-00	May-01	Apr-02
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1 U	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1 U	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1 U	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1 U	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1 U	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1 U	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1 U	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	5 U	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	5.8	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	5.52	Dry	Dry
Conductivity	NA	mS/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	806	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	5.8	Dry	Dry
			May-03	May-04	Jul-05	Aug-06	Jun-07	Aug-08	Apr-09	May-10	May-11	Apr-12
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	0	0	0/0	0
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	10 U	26 U	9.4 J/14	10 U
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.67	1.6	1.9/1.8	2.1
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	7.73	8.73	6.83	6.69
Conductivity	NA	mS/cm	Dry	Dry	Dry	Dry	Dry	Dry	1013	1045	931	960
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	11.8	11.49	8.72	10.43

Appendix D
Table D.7

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-46

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Apr-13	Apr-14	Apr-15	Apr-16	Apr-17	Apr-18	Apr-19	May-20	Apr-24	May-22
Benzene	1	µg/L	1.0 U	1.0 U	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	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Monochlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
2-Chlorotoluene	5	µg/L	1.0 U	1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 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	µg/L	1.0 U	1.0 U	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 Organics	NA	µg/L	0	0	0	0	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	0.01	4.4 J	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
TOC	NA	mg/L	2.1	3.2	10.4	10.4	2.3	3.2	3.3	3.1	1.0/4.5	2.3
pH	6.5 - 8.5	S.U.	7.24	7.24	6.75	6.75	6.18	7.02	5.99	7.78	8.69	7.0
Conductivity	NA	mS/cm	0.888	0.888	0.87	0.87	0.85	1.00	0.96	1.00	1.06	1.01
Temperature	NA	Celsius	9.1	9.1	6.9	6.9	7.8	5.1	7.7	14.7	9.7	11.7

			Apr-23	Apr-24	Apr-25
Benzene	1	µg/L	1.0 U	1.0 U	1.0 U
Toluene	5	µg/L	1.0 U	1.0 U	1.0 U
Monochlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U
2-Chlorotoluene	5	µg/L	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	3	µg/L	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	3	µg/L	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U
1,2,3-Trichlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U
Total Targeted Organics	NA	µg/L	0	0	0
Total Recoverable Phenolics	1	µg/L	5.00 U	5.0 U	5.0 U
TOC	NA	mg/L	2.2	2.0	1.8
pH	6.5 - 8.5	S.U.	6.97	6.76	7.28
Conductivity	NA	mS/cm	0.97	0.890	0.858
Temperature	NA	Celsius	6.7	13.09	1.58

Notes:

- (1)

- Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgment; except analyses for Total Recoverable Phenolics were reported as Phenols in February 1984
- (2)

- Groundwater standards are New York State Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998
- Interceptor Trench operation began in October 1990; first full month of operation was November 1990
- Dry

- Dry well or insufficient sample for analyses
- J

- Estimated at associated value
- NA

- Not analyzed or not available
- S.U.

- Standard Unit
- TOC

- Total Organic Carbon
- U

- Not detected at associated value
- µg/L

- Micrograms per liter
- mS/cm

- Microsiemens per centimeter
- Concentration exceeds New York State water quality standards

Appendix E

Landfill Cap, Site Cover, and Fence Inspection and IT System Manhole and NAPL Collection Well Inspection Forms



Glenn Springs Holdings, Inc.

A subsidiary of Occidental Petroleum

Durez North Tonawanda Semiannual IT System Inspections

Date: 5/30/2025

Checked By: J. ADAMS / S. GARDNER

Station Number	Manhole Column				NAPL Well			
	Condition	Visible Chemistry	Sediment	Water Depth	Flow Speed	NAPL	Amount Removed	Date Removed
Main Lift Station	Good	N	N	2.22	No Flow	N	N/A	N/A
MH-4+20	Good	N	N	0.19	FAST	N	N/A	N/A
MH-5+54	Good	N	N	0.75	MOD	N	N/A	N/A
MH-8+13	Good	N	N	0.92	MOD	N	N/A	N/A
MH-10+75	Good	N	N	0.52	FAST	N	N/A	N/A
MH-12+58	Good	N	N	0.61	FAST	N	N/A	N/A
Lift Station #1	Good	N	N	2.80	FAST	N	N/A	N/A
MH-13+99	Good	N	N	0.20	FAST	N	N/A	N/A
MH-17+20	Good	N	N	0.42	MOD	N	N/A	N/A
MH-19+78	Good	N	N	0.46	SLOW	N	N/A	N/A
MH-23+55	Good	N	N	0.32	SLOW	N	N/A	N/A
MH-26_55	Good	N	N	0.25	SLOW	N	N/A	N/A
Lift Station #2	Good	N	N	2.56	FAST	N	N/A	N/A
MH-33+35	Good	N	N	0.03	FAST	N	N/A	N/A
MH-37+13	Good	N	N	0.40	No Flow	N	N/A	N/A
MH-40+70	Good	N	N	0.10	No Flow	N	N/A	N/A
MH-43+54	Good	N	N	0.20	SLOW	N	N/A	N/A
Lift Station #3	Good	N	N	2.31	No Flow	N	N/A	N/A
MH-49+48	Good	N	N	0.09	SLOW	N	N/A	N/A
MH-53+51	Good	N	X	0.23	SLOW	N	N/A	N/A
MH-56+60	Good	N	Y	0.03	No Flow	N	N/A	N/A
MH-57+97	Good	N	X	DRY	No Flow	N	N/A	N/A
MH-58+56	Good	N	N	DRY	No Flow	N	N/A	N/A
MH-61+20	Good	N	N	DRY	No Flow	N	N/A	N/A
MH-64+84	Good	N	N	0.30	No Flow	N	N/A	N/A
MH-66+28	Good	N	Y	0.40	SLOW	N	N/A	N/A
MH-69+97	Good	N	Y	0.12	SLOW	N	N/A	N/A
MH-71+54	Good	N	Y	0.32	No Flow	N	N/A	N/A
MH-72+65	Good	N	Y	0.83	No Flow	N	N/A	N/A
MH-72+96	Good	N	Y	0.56	No Flow	N	N/A	N/A
MH-74+68	Good	N	Y	0.87	No Flow	N	N/A	N/A
MH-74+90	Good	N	N	1.10	No Flow	N	N/A	N/A
MH-77+39	Good	N	N	0.10	SLOW	N	N/A	N/A
MH-77+72	Good	N	N	0.16	SLOW	N	N/A	N/A
MH-80+95	Good	N	N	0.42	SLOW	N	N/A	N/A



Glenn Springs Holdings, Inc.

A subsidiary of Occidental Petroleum

Semiannual Site Cover and Fence Inspection

Site: DUREZ NT

Weather: 68-83°F PARTLY CLOUDY

Date: 6/18/2025

WINDS WSW 5-10 MPH.

Inspector: J. ADAMS/S. GARDNER

Inspection Item	Applicable to Site	Inspect For	
1. Landfill Cap	Y / <u>(N)</u>	- Signs of erosion (cap, ditches, swales)	Y / N
		- Exposure of the HDPE Liner	Y / N
		- Areas of insufficient grass coverage	Y / N
		- Signs of dead/dying grass	Y / N
		- Presence of washouts	Y / N
		- Settlement causing ponding of water	Y / N
		- Signs of slope instability	Y / N
		- Signs of burrowing by animals	Y / N
		- Presence of rooting trees (cap, ditches, swales)	Y / N
		- Signs of poor drainage in ditches/swales	Y / N
2. Site Cover	<u>(Y)</u> / N	- Signs of erosion (cap, ditches, swales)	Y / <u>(N)</u>
		- Areas of insufficient asphalt, grass, vegetation cover	Y / <u>(N)</u>
		- Signs of dead/ dying grass/ vegetation	Y / <u>(N)</u>
		- Presence of Washouts	<u>(Y)</u> / N
		- Settlement causing ponding of water	Y / <u>(N)</u>
		- Signs of slope instability	Y / <u>(N)</u>
		- Signs of burrowing by animals	<u>(Y)</u> / N
		- Presence of rooting trees (cap, ditches, swales)	Y / <u>(N)</u>
		- Signs of poor drainage in ditches/swales	Y / <u>(N)</u>
3. Perimeter Fence	<u>(Y)</u> / N	- Breaches in the fence	Y / <u>(N)</u>
		- Gates secure	<u>(Y)</u> / N
		- Locks in place	<u>(Y)</u> / N
		- Missing or illegible signage	Y / <u>(N)</u>

Comments/ Remarks

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

- PRESENCE OF BURROWING ANIMALS ALONG EAST FENCELINE.
- SOIL COVER OVER FOUNDATION WASHED OUT EXPOSING FOUNDATION. SOUTHEAST PORTION OF SITE, LOCATIONS STAKED. - FILLED ON 6/20/2025

Notes:

HDPE - High Density Polyethylene

Signature: *[Signature]*



Glenn Springs Holdings, Inc.

A subsidiary of Occidental Petroleum

Durez North Tonawanda Semiannual IT System Inspections

Date: 8/22/2025 Checked By: J. Adams/S. GARDNER

Station Number	Manhole					NAPL Well		
	Condition	Visible Chemistry	Sediment	Water Depth	Flow Speed	NAPL	Amount Removed	Date Removed
Main Lift Station	Good	N	N	3.40	FAST	N	N/A	N/A
MH-4+20	Good	N	N	0.18	FAST	N	N/A	N/A
MH-5+54	Good	N	N	0.74	SLOW	N	N/A	N/A
MH-8+13	Good	N	N	0.85	SLOW	N	N/A	N/A
MH-10+75	Good	N	N	0.07	SLOW	N	N/A	N/A
MH-12+58	Good	N	N	0.63	SLOW	N	N/A	N/A
Lift Station #1	Good	N	N	3.15	FAST	N	N/A	N/A
MH-13+99	Good	N	N 0.17	0.39	FAST	N	N/A	N/A
MH-17+20	Good	N	N	0.39	FAST	N	N/A	N/A
MH-19+78	Good	N	N	0.39	No Flow	N	N/A	N/A
MH-23+55	Good	N	Y	0.16	No Flow	N	N/A	N/A
MH-26_55	Good	N	N	0.13	No Flow	N	N/A	N/A
Lift Station #2	Good	N	N	2.70	No Flow	N	N/A	N/A
MH-33+35	Good	N	N	0.01	No Flow	N	N/A	N/A
MH-37+13	Good	N	N	0.47	No Flow	N	N/A	N/A
MH-40+70	Good	N	N	0.03	No Flow	N	N/A	N/A
MH-43+54	Good	N	N	0.01	No Flow	N	N/A	N/A
Lift Station #3	Good	N	N	3.00	No Flow	N	N/A	N/A
MH-49+48	Good	N	Y	0.01	No Flow	N	N/A	N/A
MH-53+51	Good	N	Y	0.16	No Flow	N	N/A	N/A
MH-56+60	Good	N	Y	DRY	No Flow	N	N/A	N/A
MH-57+97	Good	N	Y	DRY	No Flow	N	N/A	N/A
MH-58+56	Good	N	Y	DRY	No Flow	N	N/A	N/A
MH-61+20	Good	N	Y	DRY	No Flow	N	N/A	N/A
MH-64+84	Good	N	Y	DRY	No Flow	N	N/A	N/A
MH-66+28	Good	N	Y	DRY	No Flow	N	N/A	N/A
MH-69+97	Good	N	Y	0.03	No Flow	N	N/A	N/A
MH-71+54	Good	N	Y	DRY	No Flow	N	N/A	N/A
MH-72+65	Good	N	Y	0.23	No Flow	N	N/A	N/A
MH-72+96	Good	N	Y	0.30	SLOW	N	N/A	N/A
MH-74+68	Good	N	Y	0.03	SLOW	N	N/A	N/A
MH-74+90	Good	N	Y	DRY	No Flow	N	N/A	N/A
MH-77+39	Good	N	Y	0.04	No Flow	N	N/A	N/A
MH-77+72	Good	N	Y	0.11	No Flow	N	N/A	N/A
MH-80+95	Good	N	Y	0.37	No Flow	N	N/A	N/A

LSI CHLORINE-LIKE ODOR



Glenn Springs Holdings, Inc.

A subsidiary of Occidental Petroleum

Semiannual Site Cover and Fence Inspection

Site: DUREZ NT

Weather: 45-51°F CLOUDY, CHANCE OF RAIN

Date: 11/7/2025

WINDS WSW 10-25 MPH

Inspector: J. ADAMS / S. GARDNER

Inspection Item	Applicable to Site	Inspect For	
1. Landfill Cap	Y / <u>(N)</u>	- Signs of erosion (cap, ditches, swales) - Exposure of the HDPE Liner - Areas of insufficient grass coverage - Signs of dead/dying grass - Presence of washouts - Settlement causing ponding of water - Signs of slope instability - Signs of burrowing by animals - Presence of rooting trees (cap, ditches, swales) - Signs of poor drainage in ditches/swales	Y / N Y / N Y / N Y / N Y / N Y / N Y / N Y / N Y / N Y / N
2. Site Cover	<u>(Y)</u> / N	- Signs of erosion (cap, ditches, swales) - Areas of insufficient asphalt, grass, vegetation cover - Signs of dead/ dying grass/ vegetation - Presence of Washouts - Settlement causing ponding of water - Signs of slope instability - Signs of burrowing by animals - Presence of rooting trees (cap, ditches, swales) - Signs of poor drainage in ditches/swales	Y / <u>(N)</u> Y / <u>(N)</u> Y / <u>(N)</u> <u>(Y)</u> / N Y / <u>(N)</u> Y / <u>(N)</u> <u>(Y)</u> / N Y / <u>(N)</u> Y / <u>(N)</u>
3. Perimeter Fence	<u>(Y)</u> / N	- Breaches in the fence - Gates secure - Locks in place - Missing or illegible signage	Y / <u>(N)</u> <u>(Y)</u> / N <u>(Y)</u> / N Y / <u>(N)</u>

Comments/ Remarks

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

- PRESENCE OF BURROWING ANIMALS ALONG EAST FENCELINE
- SOIL COVER OVER FOUNDATION (SW CORNER) WASHED OUT EXPOSING
FOUNDATION. SOUTHEAST PORTION OF SITE, LOCATIONS STAKED

Notes:

HDPE - High Density Polyethylene

Signature: [Signature]

Appendix F

Waste Manifests

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD002106938	2. Page 1 of 1	3. Emergency Response Phone (800) 483-3718	4. Manifest Tracking Number 012008554 FLE		
5. Generator's Name and Mailing Address Cocidental Chemical Corp c/o Glenn Springs Holding c/o Glen Springs Remediation 805 97th Street Nagara Falls, NY 14304 Generator's Phone: (716) 345-1978 ATTN: Dennis Hoyt				Generator's Site Address (if different than mailing address) 700 Walck Road North Tonawanda, NY 14120			
6. Transporter 1 Company Name Clean Harbors Environmental Services, Inc.				U.S. EPA ID Number: MAD009322250			
7. Transporter 2 Company Name				U.S. EPA ID Number:			
8. Designated Facility Name and Site Address Clean Harbors El Dorado LLC 309 American Circle El Dorado, AR 71730 Facility's Phone: (870) 863-7173				U.S. EPA ID Number: ARD069748192			
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./vol.	13. Waste Codes
			No.	Type			
	x	NA3077, HAZARDOUS WASTE, SOLID, N.O.S., (CHLOROBENZENES, BENZENE), 9, PG III	1	DM	260	P	11019 11027 11037 11070 11071 E 11072 11077 11083
14. Special Handling Instructions and Additional Information 1. CH2507697 ERG#171 1x55g							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name: DENNIS HOYT AS AN AGENT FOR GLENN SPRINGS/ECCL Signature: <i>[Signature]</i> Month: 6 Day: 12 Year: 25							
TRANSPORTER INTL	16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:						
	Transporter signature (for exports only):						
	17. Transporter Acknowledgment of Receipt of Materials						
TRANSPORTER	Transporter 1 Printed/Typed Name: JOHN WELSH Signature: <i>[Signature]</i> Month: 6 Day: 12 Year: 25				Month: Day: Year:		
	Transporter 2 Printed/Typed Name:				Month: Day: Year:		
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection						
	Manifest Reference Number:						
	18b. Alternate Facility (or Generator)				U.S. EPA ID Number:		
	Facility's Phone:				Month: Day: Year:		
18c. Signature of Alternate Facility (or Generator)							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H040		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name: <i>[Signature]</i> Signature: <i>[Signature]</i> Month: 6 Day: 12 Year: 25				Month: Day: Year:			



Land Disposal Restriction
Notification Form

Page : 1 of 1

Printed Date : Jun 12, 2025

MANIFEST INFORMATION

Generator : Occidental Chemical Corp c o Glenn Springs

Address: 700 Walck Road
North Tonawanda, NY 14120

EPA ID #: NYD002106938

Manifest Tracking Info.

Sales Order No: 2503282930-002

Certification

Applies to
Manifest Line
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

1.

Waste analysis data, where available, is attached.

Signature :

Dennis Hoyt

Print Name

Dennis Hoyt As agent for
Glenn Springs/OC

Title :

Principal

Date :

6/12/25

Clean Harbors Manifest Addendum

Page:1 of 1

<u>Generator ID Number:</u>		<u>Sales Order Number:</u>	
NYD002106938		2503282930-002	
Occidental Chemical Corp c o Glenn Springs Holding			
700 Walck Road			
North Tonawanda, NY14120			
<u>Line #:</u>	<u>Profile No:</u>	<u>Profile Description:</u>	<u>Waste Codes:</u>
1.	CH2507697		U071 U072 U127 U188
	<u>CH Container #</u>	<u>Customer Container #</u>	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD002106938	2. Page 1 of 1	3. Emergency Response Phone (800) 483-3718	4. Manifest Tracking Number 012008458 FLE	
5. Generator's Name and Mailing Address Environmental Resource Holdings LLC c/o Glenn Springs Holdings, Inc. 805 97th Street, Niagara Falls, NY 14304 Generator's Phone: (716) 345-1978 ATTN: Dennis Hoyt 700 Walck Road North Tonawanda, NY 14120						
6. Transporter 1 Company Name Safety-Kleen Systems, Inc.				U.S. EPA ID Number TXR000081205		
7. Transporter 2 Company Name Clean Harbors Environmental Services INC				U.S. EPA ID Number IMAD039322250		
8. Designated Facility Name and Site Address Clean Harbors El Dorado LLC 309 American Circle El Dorado, AR 71730 Facility's Phone: (870) 863-7173				U.S. EPA ID Number ARD069748192		
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity
				No.	Type	12. Unit Wt./Vol.
	x	NA3077, HAZARDOUS WASTE, SOLID, N.O.S., (CHLOROBENZENES, BENZENE), 9, PG III		1	DM	EST 400 P
						13. Waste Codes U019 U027 U037 U070 U071 B
14. Special Handling Instructions and Additional Information 1. CH2507697 ERG#171						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Offor's Printed/Typed Name Dennis Hoyt Signature Dennis Hoyt Month 12 Day 19 Year 25 Spring Holdings Inc.						
TRANSPORTER	16. International Shipments ☐ Import to U.S. ☐ Export from U.S.		Port of entry/exit: _____ Date leaving U.S.: _____			
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Jonathan Mangel Signature Jonathan Mangel Month 12 Day 19 Year 25 Transporter 2 Printed/Typed Name Ervin Miller Signature Ervin Miller Month 12 Day 30 Year 25					
DESIGNATED FACILITY	18. Discrepancy 18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection Manifest Reference Number: _____ U.S. EPA ID Number: _____ Facility's Phone: _____ 18c. Signature of Alternate Facility (or Generator) _____ Month _____ Day _____ Year _____					
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H040 2. _____ 3. _____ 4. _____					
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Printed/Typed Name Stephane Matheny Signature Stephane Matheny Month 11 Day 17 Year 26					
	DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED) Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.					

6-11-52

746

9 034 MO 2

to be kept for 24 hours
on condition of 24 hours

Stephen M. Waters - 1752



Land Disposal Restriction
Notification Form

Page : 1 of 1

Printed Date : Dec 18, 2025

MANIFEST INFORMATION

Generator : Environmental Resource Holdings LLC c/o
Address: 700 Walck Road *Glenn Springs Holdings, Inc.*
North Tonawanda, NY 14120

Manifest Tracking Info.

01200858 FLE

EPA ID #: NYD002106938

Sales Order No: 2507135259-002

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	CH2507697	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code	EPA Waste SubCategory
U019 U027 U037 U070 U071 U072 U127 U188	NONE

LDR Chemical Data

Chemical	Underlying Hazardous Constituents	Constituents of Concern	Contaminants Subject to Treatment
BENZENE	N	N	N
CHLOROBENZENE	N	N	N
Hexachlorobenzene	N	N	N
m-Dichlorobenzene	N	N	N
o-Dichlorobenzene	N	N	N
P-DICHLOROBENZENE	N	N	N
Phenol	N	N	N

Certification

Applies to
Manifest Line
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

1.

Waste analysis data, where available, is attached.

Signature *Dennis Hoyt* *as an agent for Glenn Springs Holdings, Inc.* Print Name

Title : *Principal* Date :

Dennis Hoyt
12-19-2025

Appendix G

Additional Groundwater Monitoring



Glenn Springs Holdings, Inc.

A subsidiary of Occidental Petroleum

Joe Branch
Project Manager
Direct Dial (231) 670-6809

7601 Old Channel Trail
Montague, MI 49437

February 6, 2026
Revised June 1, 2026

Reference No. TR1045-32A

Mr. Jason Kryszak
New York State Department of Environmental Conservation
700 Delaware Avenue
Buffalo, NY 14209

Dear Mr. Kryszak:

**Re: Durez NT Remediation Project
Groundwater Monitoring Program
Additional Chemical Monitoring Report
NYSDEC Site No. 932018**

As requested by the New York State Department of Environmental Conservation (NYSDEC) in their Periodic Review Report (PRR) Response Letter dated April 19, 2024, Glenn Springs Holdings, Inc (GSHI) has prepared this letter report for the additional groundwater monitoring conducted at the Durez North Tonawanda Site (Durez NT) in North Tonawanda, New York.

The monitoring was performed in accordance with the NYSDEC approved *Groundwater Monitoring Plan (GMP) – Revision 1*, dated April 5, 2019 (GHD) for the Site which contains the procedures for implementing the groundwater monitoring program for the Site consistent with the requirements presented in the 1989 Partial Consent Judgement (PCJ) and the Minor Change Number 10, revision 2 (1999) of the PCJ. The additional groundwater monitoring program includes the collection of groundwater samples from existing interior monitoring wells and piezometers, laboratory analysis of these samples for the targeted site compounds (TSCs) and an evaluation of the results to assess overall groundwater quality at the Site. The well locations for the Durez Site are presented on **Figure 1**.

These activities were performed in accordance with the "*Workplan for Evaluation of Groundwater Quality*" for the Site ("Work Plan"), dated June 18, 2024, prepared by GSH for the NYSDEC. The Work Plan was approved by the NYSDEC on August 1, 2024. The standard Durez NT annual wells monitored for groundwater chemistry and proposed well locations for additional sampling are presented on **Figure 2**.

1. Scope of Work

Per Comment Number 8 in the NYSDEC PRR Response Letter, the NYSDEC requested that existing monitoring wells located inside the groundwater interceptor trench be sampled for targeted site compounds (TSCs) to provide an update on groundwater conditions around the Site. GSH proposed to collect samples from the following monitoring wells and piezometers:

- | | | |
|---------|---------|----------|
| • NP-2 | • P-6A | • P-30 |
| • NP-10 | • P-7 | • P-3-96 |
| • NP-13 | • P-11 | • T-5C |
| • NP-15 | • P-13 | • T-9C |
| • NP-16 | • P-16 | • T-11C |
| • NP-20 | • P-17 | • T-13C |
| • P-1 | • P-19A | • P-29 |

In addition to the collection of groundwater samples from the proposed 21 monitoring well and piezometer locations, GSH also proposed to collect quality control samples, in accordance with the approved Quality Assurance Project Plan (QAPP), as follows:

- 1 blind (field) duplicate
- 1 matrix spike and 1 matrix spike duplicate
- 1 trip blank for volatile organic compounds per day of sampling

Samples collected from the monitoring wells and piezometers were to be analyzed for the TSCs. The TSCs are as follows:

- **Volatile Organic Compounds (VOCs)**
Benzene, Toluene, Chlorobenzene, o-Chlorotoluene, 1,2-dichlorobenzene, 1,4-dichlorobenzene, 1,2,3-trichlorobenzene, and 1,2,4-trichlorobenzene
- **General Chemistry**
Total Organic Carbon, Total Recoverable Phenols.

All sampling and analysis activities will be performed in accordance with the NYSDEC approved Groundwater Monitoring Plan (GMP) – Revision 1, dated April 5, 2019 (GHD) (Appendix A) and the QAPP found in Appendix B.

2. Durez NT Groundwater Sampling Results

The semiannual groundwater sampling event was conducted from March 12 through 15, 2025. GSH proposed collecting groundwater samples from 21 monitoring wells and piezometers. Of the 21 locations proposed for sampling, only 12 locations had sufficient water to permit sample collection. The locations successfully sampled are presented on **Figure 3**. The locations sampled were P-3-96, NP-10, NP-13, NP-15, NP-16, P-6A, P-7, P-11, P-13, P-19A, P-29, , and T-9C.

- 3 -

Associated purge logs and field notes for the additional chemical monitoring are included in **Attachment A**. Analytical results are provided in **Table 1** and the Quality Assurance/Quality Control (QA/QC) [data validation] report is presented in Attachment B.

Analytical results from the additional chemical monitoring event were compared to the New York State (NYS) Class GA Groundwater [Quality] Standards (Class GA Groundwater Standards) set forth in the NYSDEC *Division of Water Technical and Operational Guidance Series (1.1.1), Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations (June 1998)* (NYS GQS).

Based on the comparison, concentrations of TSCs exceeded the NYS GQS at the following wells:

- **NP-10:**
 - Chlorobenzene detected at 26 µg/L (standard: 5 µg/L).
- **NP-15:**
 - 1,2-Dichlorobenzene detected at 230 µg/L (standard: 3 µg/L)
 - 1,4-Dichlorobenzene detected at 190 µg/L (standard: 3 µg/L)
 - Benzene detected at 210 µg/L (standard: 1 µg/L)
 - Chlorobenzene detected at 620 µg/L (guidance value: 5 µg/L)
 - Total phenolics detected at 0.0157 mg/L (standard: 0.001 mg/L)
- **P-6A:**
 - 1,2,4-Trichlorobenzene detected at 210 µg/L (standard: 5 µg/L)
 - 1,2-Dichlorobenzene detected at 15,000 µg/L (standard: 3 µg/L)
 - 1,4-Dichlorobenzene detected at 28,000 µg/L (standard: 3 µg/L)
 - 2-Chlorotoluene detected at 25,000 µg/L (standard: 5 µg/L)
 - Benzene detected at 1,600 µg/L (standard: 1 µg/L)
 - Chlorobenzene detected at 20,000 µg/L (standard: 5 µg/L)
 - Total phenolics detected at 0.0391 mg/L (standard: 0.001 mg/L)
- **P-7:**
 - 1,2-Dichlorobenzene detected at 240 µg/L (standard: 3 µg/L)
 - 1,4-Dichlorobenzene detected at 41,000 µg/L (standard: 3 µg/L)
 - 2-Chlorotoluene detected at 5,300 µg/L (standard: 5 µg/L)
 - Benzene detected at 320 µg/L (standard: 1 µg/L)
 - Chlorobenzene detected at 7,500 µg/L (standard: 5 µg/L)
 - Toluene detected at 24 µg/L (standard: 5 µg/L, J-qualified)
 - Total phenolics detected at 0.0235 mg/L (standard: 0.001 mg/L)
- **P-11:**
 - 1,2-Dichlorobenzene detected at 6.4 µg/L (standard: 3 µg/L)
 - 1,4-Dichlorobenzene detected at 19 µg/L (standard: 3 µg/L)
 - Chlorobenzene detected at 11 µg/L (standard: 5 µg/L)

- 4 -

- **P-19A:**
 - 1,2-Dichlorobenzene detected at 70 µg/L (standard: 3 µg/L)
 - 1,4-Dichlorobenzene detected at 27 µg/L (standard: 3 µg/L)
 - Chlorobenzene detected at 33 µg/L (standard: 5 µg/L)

For monitoring location P-13, the parameters 1,4-dichlorobenzene, chlorobenzene, and toluene were detected at concentrations less than the NYS GQS. For monitoring locations NP-13, NP-16, P-3-96, P-29, and T-9C, groundwater samples were non-detect for targeted site compounds (TSCs). Although total organic carbon (TOC) was detected in all monitoring wells and piezometers, TOC does not have an established NYS GQS.

3. Historical Groundwater Monitoring Chemistry

Groundwater chemistry for the additional chemical monitoring event was compared to the historical groundwater chemistry available in the February 1989 Record of Decision (1989 ROD) prepared by the NYSDEC to provide an update on groundwater conditions at the Site. The historical plant and off-plant overburden groundwater chemistry are summarized in **Table 2** and **Table 3**, respectively. Comparison of the groundwater chemistry of historical sampling locations from the 1989 ROD and 2025 additional sampling event are presented on **Figure 4**. Not all wells sampled in the 2025 additional sampling event were sampled historically, so in those instances they were compared to the closest wells sampled included in the 1989 ROD.

The historical areas of contaminated overburden groundwater and the sampled monitoring well locations are presented on **Figure 5**. The areas of contamination are approximate and sourced from the 1989 ROD.

4. Data Review and Evaluation

Five of the 12 wells sampled for VOCs were non-detect for VOCs while eight of the 11 wells sampled for phenolics were non-detect for phenolics. As indicated in the QA/QC report (**Attachment B**), the laboratory reported results to the method detection limit (MDL) for each analyte. With the exception of the MDL for total recoverable phenolics, all other MDLs were less than or equal to the NYS GQS. Hydraulic monitoring for the supplemental groundwater sampling was completed on February 28, 2025. This data is presented in **Table 4** along with the March 27, 2025 semiannual hydraulic monitoring data.

Historical areas of contamination identified in the 1989 ROD along with the locations of current overburden wells are shown on **Figure 6**. Of the wells sampled in 2025, all wells with detected concentrations of TSCs above the NYS GQS were situated within the approximate high-impact areas delineated in the 1989 ROD, with the exception of well NP-10. In 2025, NP-10 reported a chlorobenzene concentration of 26 µg/L, whereas nearby wells NP-2 and NP-11 were reported as non-detect in the 1989 ROD. NP-11 is shown on **Figure 5** but no longer exists at the site. Except for NP-10 and P-6A, all wells exhibited total TSC concentrations less than those reported for adjacent wells in the 1989 ROD.

- 5 -

The highest total detected concentrations of the TSCs were observed at P-6A and P-7 at 89,849 µg/L and 17,508 µg/L, respectively. These wells are located within the central portion of the former Durez Plant, an area identified in the 1989 (ROD) as having elevated groundwater contamination. The 2025 results are consistent with historical conditions, as total detected TSCs in well P-7 were reported at 66,290 µg/L in the 1989 ROD.

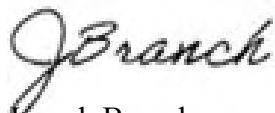
Groundwater quality monitoring at the Site consists of seven monitoring wells (NP 22A, NP 23, NP 27, P 32A, NP 35, NP 44, and NP 46) that are sampled annually. As indicated in **Attachment C**, analytical results from annual groundwater monitoring events, beginning in 1993, have been primarily non-detect for all parameters except TOC, which is an indicator parameter that serves as a rapid, reliable measurement of overall organic impacts and water quality than individual contaminants. Although TOC concentrations were detected, there is no NYS water quality standard for TOC. As indicated in the semi-annual hydraulic monitoring reports and the annual Periodic Review Reports, the interceptor trench (IT) continues to effectively prevent off Site migration of impacted groundwater, as no detections have been observed in wells outside of the IT.

Overall, the downward trend of TSC concentrations from the levels reported in the 1989 ROD indicates that natural degradation of existing contaminants is occurring in the interior portion of the Site. Semi-annual hydraulic monitoring and annual groundwater monitoring support the conclusion that the remedial treatment system remains effective in intercepting contaminated groundwater.

Please contact me via phone (231-670-6809) or email at joseph_branch@oxy.com with any questions or comments.

Very truly yours,

GLENN SPRINGS HOLDINGS, INC.



Joseph Branch
Project Manager

Encl.

cc: Chelsea Spahr, City of North Tonawanda
Joe Aeillo, City of North Tonawanda
Clint Babcock, GSH
Tim Bathory, GSH
Dennis Hoyt, B&B Engineers & Geologists for New York, P.C.
Ian Richardson, B&B Engineers & Geologists for New York, P.C.

Appendix G - Tables

Table 1
Analytical Results Summary
Additional Chemical Monitoring
Durez NT Site
North Tonawanda, New York
March 2025

			Sample Location:	NP-10	NP-13	NP-15	NP-16	P-3-96	P-3-96	P-6A
			Sample ID:	NP-10-0325	NP-13-0325	NP-15-0325	NP-16-0325	P-3-96-0325	P-15-96-0325	P-6A-0325
			Sample Date:	3/14/2025	3/12/2025	3/15/2025	3/13/2025	3/12/2025	3/12/2025	3/14/2025
									(Duplicate)	
Parameters	Standard Value*	Units								
Volatile Organic Compounds										
1,2,3-Trichlorobenzene	5	µg/L		1.0 U	1.0 U	5.0 U	1.0 U	1.0 U	1.0 U	250 U
1,2,4-Trichlorobenzene	5	µg/L		1.0 U	1.0 U	2.7 J	1.0 U	1.0 U	1.0 U	210 J
1,2-Dichlorobenzene	3	µg/L		1.7	1.0 U	230	1.0 U	1.0 U	1.0 U	15000
1,4-Dichlorobenzene	3	µg/L		2.7	1.0 U	190	1.0 U	1.0 U	1.0 U	28000
2-Chlorotoluene	5	µg/L		1.0 U	1.0 U	3.2 J	1.0 U	1.0 U	1.0 U	25000
Benzene	1	µg/L		0.29 J	1.0 U	210	1.0 U	1.0 U	1.0 U	1600
Chlorobenzene	5	µg/L		26	1.0 U	620	1.0 U	1.0 U	1.0 U	20000
Toluene	5	µg/L		1.0 U	1.0 U	5.0 U	1.0 U	1.0 U	1.0 U	250 U
General Chemistry										
Phenolics (total)	0.001	mg/L		0.0050 U	0.0050 U	0.0157	0.0050 U	0.0050 U	0.0050 U	0.0391
Total Organic Carbon	-	mg/L		7.4	3.0	11.9	8.4	2.7	2.8	10.3
Field Parameters										
pH, field	6.5-8.5	s.u.		5.99	6.93	7.26	7.19	7.03	7.03	6.92
Temperature, field	-	deg C (deg F)		6.24 (43.23)	6.93 (44.47)	5.65 (42.17)	9.30 (48.74)	8.25 (46.85)	8.25 (46.85)	16.49 (61.682)
Conductivity, field	-	mS/cm		0.904	1.140	1.23	0.801	0.89	0.89	1.02
Turbidity, field	-	NTU		147	52.2	65.1	2.64	4.59	4.59	3.6
Dissolved oxygen (DO), field	-	mg/L		0.84	0.56	1.64	9.07	8.93	8.93	0.34
Oxidation/reduction potential (ORP), field	-	mV		-74	-71	-151	83	130	130	-131

Notes:

U - Not present at or above the associated value

J - Estimated concentration

µg/L - Micrograms per liter

mg/L - Milligrams per liter

s.u. - Standard Unit

deg C (deg F) - degrees Celsius (degrees Fahrenheit)

mS/cm - Millisiemens per centimeter

NTU - Nephelometric Turbidity Unit

mV - millivolts

1.14 - Concentration is bold are detections above reporting limit

367 - Concentration in bold and grey highlight exceeds Standard Value

* - Groundwater standards are NYS Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998

** - Partial sample (VOCs only) taken due to insufficient volume

- - Not applicable

Table 1

Analytical Results Summary
Additional Chemical Monitoring
Durez NT Site
North Tonawanda, New York
March 2025

			Sample Location:	P-7	P-11	P-13**	P-19A	P-29	T-9C
			Sample ID:	P-7-0325	P-11-0325	P-13-0325	P-19A-0325	P-29-0325	T-9C-0325
			Sample Date:	3/15/2025	3/15/2025	3/15/2025	3/12/2025	3/13/2025	3/14/2025
Parameters	Standard Value*	Units							
Volatile Organic Compounds									
1,2,3-Trichlorobenzene	5	µg/L	50 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	
1,2,4-Trichlorobenzene	5	µg/L	50 U	0.60 J	1.0 U	1.0 U	1.0 U	1.0 U	
1,2-Dichlorobenzene	3	µg/L	240	6.4	1.0 U	70	1.0 U	1.0 U	
1,4-Dichlorobenzene	3	µg/L	4100	19	0.29 J	27	1.0 U	1.0 U	
2-Chlorotoluene	5	µg/L	5300	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	
Benzene	1	µg/L	320	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	
Chlorobenzene	5	µg/L	7500	11	0.34 J	33	1.0 U	1.0 U	
Toluene	5	µg/L	24 J	1.0 U	0.25 J	1.0 U	1.0 U	1.0 U	
General Chemistry									
Phenolics (total)	0.001	mg/L	0.0235	0.0050 U	-	0.0050 U	0.0050 U	0.0050 U	
Total Organic Carbon	-	mg/L	5.9	3.5	-	4.3	6.6	4.4	
Field Parameters									
pH, field	6.5-8.5	s.u.	6.93	7.72	7.59	6.63	7.30	6.98	
Temperature, field	-	deg C (deg F)	15.58 (60.04)	7.99 (46.38)	10.46 (50.83)	5.85 (42.53)	4.41 (39.94)	7.26 (45.07)	
Conductivity, field	-	mS/cm	1.330	0.244	0.262	2.950	0.323	0.82	
Turbidity, field	-	NTU	136	196	144	44.4	21.8	23.1	
Dissolved oxygen (DO), field	-	mg/L	0.52	1.49	2.19	1.88	3.20	0.88	
Oxidation/reduction potential (ORP), field	-	mV	-209	-99	-155	-2	-37	71	

Notes:

U - Not present at or above the associated value

J - Estimated concentration

µg/L - Micrograms per liter

mg/L - Milligrams per liter

s.u. - Standard Unit

deg C (deg F) - degrees Celsius (degrees Fahrenheit)

mS/cm - Millisiemens per centimeter

NTU - Nephelometric Turbidity Unit

mV - millivolts

1.14 - Concentration is bold are detections above reporting limit**367** - Concentration in bold and grey highlight exceeds Standard Value

* - Groundwater standards are NYS Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998

** - Partial sample (VOCs only) taken due to insufficient volume

- - Not applicable

Table 2

**Analytical Results Summary
Historical Plant Overburden Groundwater Chemistry
Durez NT Site
North Tonawanda, New York**

Parameters	Standard Value*	Units	Sample Location:								
			P-1	P-7	P-11	P-15	P-19	P-20	P-26	P-29	NP-2
			Source:	1989 ROD	1989 ROD	1989 ROD	1989 ROD	1989 ROD	1989 ROD	1989 ROD	1989 ROD
Volatile Organic Compounds											
1,2,3-Trichlorobenzene	5	µg/L	10 U	10 U	28c	10 U	10 U	10 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	10 U	910	c	10 U	10 U	10 U	1 U	1 U	1 U
1,2-Dichlorobenzene	3	µg/L	160	3200	160	10 U	46	37	10	1 U	2
1,4-Dichlorobenzene	3	µg/L	280	5500	200	10 U	14	25	87	1 U	2
2-Chlorotoluene	5	µg/L	a	a	1 U	a	a	a	11	1 U	1 U
Benzene	1	µg/L	a	a	18	a	a	a	93	1 U	1 U
Chlorobenzene	5	µg/L	85	12000	740	160	740	20 U	900	1 U	1 U
Toluene	5	µg/L	290	680	290	110	10 U	10 U	4200	1 U	1 U
General Chemistry											
Phenolics (total)	0.001	mg/L	2.3	44	49.5	0.48	0.207	0.037	0.014 U	**	**

Notes:

U - Not present at or above the associated value

J - Estimated concentration

µg/L - Micrograms per liter

1.14 - Concentration is bold and grey highlight exceeds reporting limit

367 - Concentration in bold and grey highlight exceeds Standard Value

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

NYSDEC Division of Water Technical and Operational Guidance Series (1.1.1), Ambient Water Quality Standards, and Guidance Values and Groundwater Effluent Limits

** - Insufficient sample for complete analysis

a - Analysis not performed for this compound

b - Sample lost due to lab accident

c - 1,2,3 and 1,2,4 Trichlorobenzene are reported together

Table 2

Analytical Results Summary
Historical Plant Overburden Groundwater Chemistry
Durez NT Site
North Tonawanda, New York

Parameters	Standard Value*	Units	Sample Location:					
			Source:					
			NP-14 1989 ROD	NP-15 1989 ROD	NP-16 1989 ROD	NP-17 1989 ROD	NP-19 1989 ROD	NP-34 1989 ROD
Volatile Organic Compounds								
1,2,3-Trichlorobenzene	5	µg/L	1 U	10 U	1 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	1 U	28	1 U	1 U	1 U	1 U
1,2-Dichlorobenzene	3	µg/L	1 U	940	1 U	1 U	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	1 U	680	1 U	1 U	1 U	1 U
2-Chlorotoluene	5	µg/L	1 U	2	1 U	1 U	1 U	1 U
Benzene	1	µg/L	1 U	92	1 U	1 U	1 U	1 U
Chlorobenzene	5	µg/L	1 U	980	1 U	1 U	1 U	1 U
Toluene	5	µg/L	1 U	39	1 U	1 U	1 U	1 U
General Chemistry								
Phenolics (total)	0.001	mg/L	**	**	**	**	**	**

Notes:

U - Not present at or above the associated value

J - Estimated concentration

µg/L - Micrograms per liter

1.14 - Concentration is bold above reporting limit

367 - Concentration in bold and grey highlight exceeds Standard

* - New York State Ambient Water Quality Standards and Guid

NYSDEC Division of Water Technical and Operational Guidaatons (June 1998)

** - Insufficient sample for complete analysis

a - Analysis not performed for this compound

b - Sample lost due to lab accident

c - 1,2,3 and 1,2,4 Trichlorobenzene are reported together

Table 3

Analytical Results Summary
Historical Off-Plant Overburden Groundwater Chemistry
Durez NT Site
North Tonawanda, New York

Parameters	Standard Value*	Units	Sample Location:	NP-4	NP-6	NP-9	NP-11	NP-23	NP-25	NP-28
			Source:	1989 ROD	1989 ROD	1989 ROD	1989 ROD	1989 ROD	1989 ROD	1989 ROD
Volatile Organic Compounds										
1,2,3-Trichlorobenzene	5	µg/L		1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L		1 U	1 U	1 U	1 U	3	1 U	1 U
1,2-Dichlorobenzene	3	µg/L		1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,4-Dichlorobenzene	3	µg/L		1 U	1 U	1 U	1 U	1 U	1 U	1 U
2-Chlorotoluene	5	µg/L		1 U	1 U	1 U	1 U	2	1 U	1 U
Benzene	1	µg/L		1 U	1 U	1 U	1 U	9	5	1 U
Chlorobenzene	5	µg/L		1 U	1 U	1 U	1 U	1 U	1 U	1 U
Toluene	5	µg/L		1 U	1 U	1 U	1 U	1 U	1 U	1 U
General Chemistry										
Phenolics (total)	0.001	mg/L		0.014 U	**	**	**	**	**	0.014 U

Notes:

U - Not present at or above the associated value

J - Estimated concentration

µg/L - Micrograms per liter

1.14 - Concentration is bold are detections above reporting limit**367** - Concentration in bold and grey highlight exceeds Standard Value

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

NYSDEC Division of Water Technical and Operational Guidance Series (1.1.1), Ambient Water Quality Standards, and Guidance Values and Groundwater Efflu

** - Insufficient sample for complete analysis

Table 3

Analytical Results Summary
Historical Off-Plant Overburden Groundwater Chemistry
Durez NT Site
North Tonawanda, New York

Parameters	Standard Value*	Units	Sample Location:						
			Source:						
			NP-30 1989 ROD	NP-31 1989 ROD	NP-35 1989 ROD	NP-41 1989 ROD	NP-43 1989 ROD	NP-44 1989 ROD	NP-46 1989 ROD
Volatile Organic Compounds									
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	14	1 U
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	48	1 U
1,2-Dichlorobenzene	3	µg/L	1 U	21	1 U	1 U	1 U	990	1 U
1,4-Dichlorobenzene	3	µg/L	1 U	26	1 U	1 U	1 U	2900	1 U
2-Chlorotoluene	5	µg/L	1 U	46	1 U	1 U	1 U	1	1 U
Benzene	1	µg/L	1 U	120	1 U	1 U	1 U	70	1 U
Chlorobenzene	5	µg/L	1 U	600	1 U	1 U	1 U	2500	1 U
Toluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	2	1 U
General Chemistry									
Phenolics (total)	0.001	mg/L	0.014 U	2.8	0.014 U	0.5 U	0.5 U	4.65	0.5 U

Notes:

U - Not present at or above the associated value

J - Estimated concentration

µg/L - Micrograms per liter

1.14 - Concentration is bold are detections above reporting limit

367 - Concentration in bold and grey highlight exceeds Standard Value

* - New York State Ambient Water Quality Standards and Guidance Values (C

NYSDEC Division of Water Technical and Operational Guidance Series (1.1ent Limitations (June 1998)

** - Insufficient sample for complete analysis

Table 3

**Analytical Results Summary
Historical Off-Plant Overburden Groundwater Chemistry
Durez NT Site
North Tonawanda, New York**

Parameters	Sample Location: NP-50		
	Source: 1989 ROD		
	Standard Value*	Units	
Volatile Organic Compounds			
1,2,3-Trichlorobenzene	5	µg/L	1 U
1,2,4-Trichlorobenzene	5	µg/L	1 U
1,2-Dichlorobenzene	3	µg/L	1 U
1,4-Dichlorobenzene	3	µg/L	1 U
2-Chlorotoluene	5	µg/L	1 U
Benzene	1	µg/L	1 U
Chlorobenzene	5	µg/L	1 U
Toluene	5	µg/L	1 U
General Chemistry			
Phenolics (total)	0.001	mg/L	0.5 U

Notes:

U - Not present at or above the associated value

J - Estimated concentration

µg/L - Micrograms per liter

1.14 - Concentration is bold are detections above reporting limit

367 - Concentration in bold and grey highlight exceeds Standard Value

* - New York State Ambient Water Quality Standards and Guidance Values (C
NYSDEC Division of Water Technical and Operational Guidance Series (1.1

** - Insufficient sample for complete analysis

Table 4

**2025 Spring Groundwater Elevations
Durez North Tonawanda
Glenn Springs Holdings, Inc.
North Tonawanda, New York**

Well ID	Reference Elevation (ft. AMSL)	Bottom of Well Elevation (ft. AMSL)	February 28, 2025	March 27, 2025
MW-1	574.52	565.29	NM	573.71
MW-3	577.01	564.77	NM	572.09
MW-4	576.40	564.18	NM	571.56
NP-10	579.79	567.99	572.46	574.07
NP-13	576.69	567.72	573.41	572.71
NP-15	578.91	568.28	575.27	575.14
NP-16	578.35	570.91	575.15	575.16
NP-19	576.66	568.86	NM	571.70
NP-2	577.37	567.64	571.58	568.76
NP-20	577.62	569.09	Dry, <569.07	Dry, <569.15
NP-21	576.90	568.62	NM	574.58
NP-22A	577.63	565.69	NM	574.33
NP-23	577.92	569.03	NM	569.34
NP-24	578.97	569.14	NM	574.53
NP-25	578.33	568.35	NM	573.60
NP-26	577.71	571.13	NM	574.03
NP-27	577.22	567.37	NM	571.06
NP-32	577.25	571.45	NM	574.09
NP-35	577.42	567.50	NM	570.98
NP-37	577.45	571.10	NM	571.24
NP-38	578.09	571.21	NM	573.97
NP-4	577.16	567.81	NM	576.79
NP-41	577.65	570.97	NM	570.14
NP-42	576.58	570.15	NM	570.61
NP-43	577.08	571.12	NM	571.19
NP-44	576.63	570.31	NM	565.89
NP-45	576.33	572.66	NM	566.36
NP-46	576.87	567.71	NM	570.42
NP-51	577.36	568.38	NM	572.66
NP-6	575.21	568.87	NM	571.02
NP-8	577.20	568.37	NM	574.27
P-1	578.88	571.27	574.70	574.40
P-11	580.14	569.95	575.83	575.80
P-13	581.43	568.54	575.11	573.48
P-16	578.32	570.99	575.09	571.55
P-17	577.46	572.00	574.17	572.53
P-1-96	574.93	567.85	NM	570.85
P-19A	580.01	567.83	574.24	573.94
P-23	578.83	571.70	NM	572.96
P-27	580.25	569.50	NM	572.74
P-29	578.74	570.98	573.49	574.63
P-2-96	574.57	568.49	NM	570.95
P-30	579.28	571.28	Dry, <572.10	Dry, <572.48
P-31	578.15	569.10	NM	569.93
P-32A	577.67	565.70	NM	569.19
P-34	576.12	566.39	NM	573.27
P-3-96	574.42	567.76	569.57	568.78
P-6A	578.93	566.13	573.38	572.47
P-7	577.46	567.91	574.49	573.68
SP-3	575.30	565.77	NM	569.72
T-10A	576.64	569.73	NM	571.48
T-10B	577.29	567.69	NM	568.68

Table 4

**2025 Spring Groundwater Elevations
Durez North Tonawanda
Glenn Springs Holdings, Inc.
North Tonawanda, New York**

T-10C	577.00	569.71	NM	570.20
T-11A	577.10	569.56	NM	569.83
T-11B	577.27	565.89	NM	568.56
T-11C	577.69	570.54	571.74	570.81
T-12A	574.64	567.41	NM	568.45
T-12B	574.92	563.81	NM	565.60
T-12C	575.45	568.43	NM	570.39
T-13A	575.09	568.18	NM	568.39
T-13B	575.07	561.78	NM	564.95
T-13C	574.98	569.39	571.25	Dry, <569.63
T-2A	577.86	565.94	NM	570.64
T-2B	578.73	563.90	NM	565.57
T-2C	578.81	570.28	NM	Dry, <570.23
T-3A	577.71	569.02	NM	570.77
T-3B	577.92	564.26	NM	571.72
T-3C	578.00	565.83	NM	571.18
T-4A	579.68	569.95	NM	571.07
T-4B	579.72	565.62	NM	570.49
T-4C	580.17	568.21	NM	571.29
T-5A	579.40	570.75	NM	<570.98
T-5B	578.63	564.14	NM	571.20
T-5C	575.74	572.41	573.35	575.55
T-6A	578.98	569.94	NM	571.30
T-6B	579.22	565.18	NM	571.21
T-6C	580.41	568.62	NM	573.72
T-7A	578.77	571.52	NM	571.28
T-7B	576.07	570.13	NM	569.07
T-7C	576.72	571.33	NM	569.52
T-8A	575.87	571.11	NM	571.99
T-8B	575.97	565.99	NM	573.67
T-8C	578.82	572.78	NM	573.49
T-9A	579.12	571.04	NM	573.27
T-9B	575.91	568.43	NM	570.09
T-9C	578.24	571.79	575.45	575.11

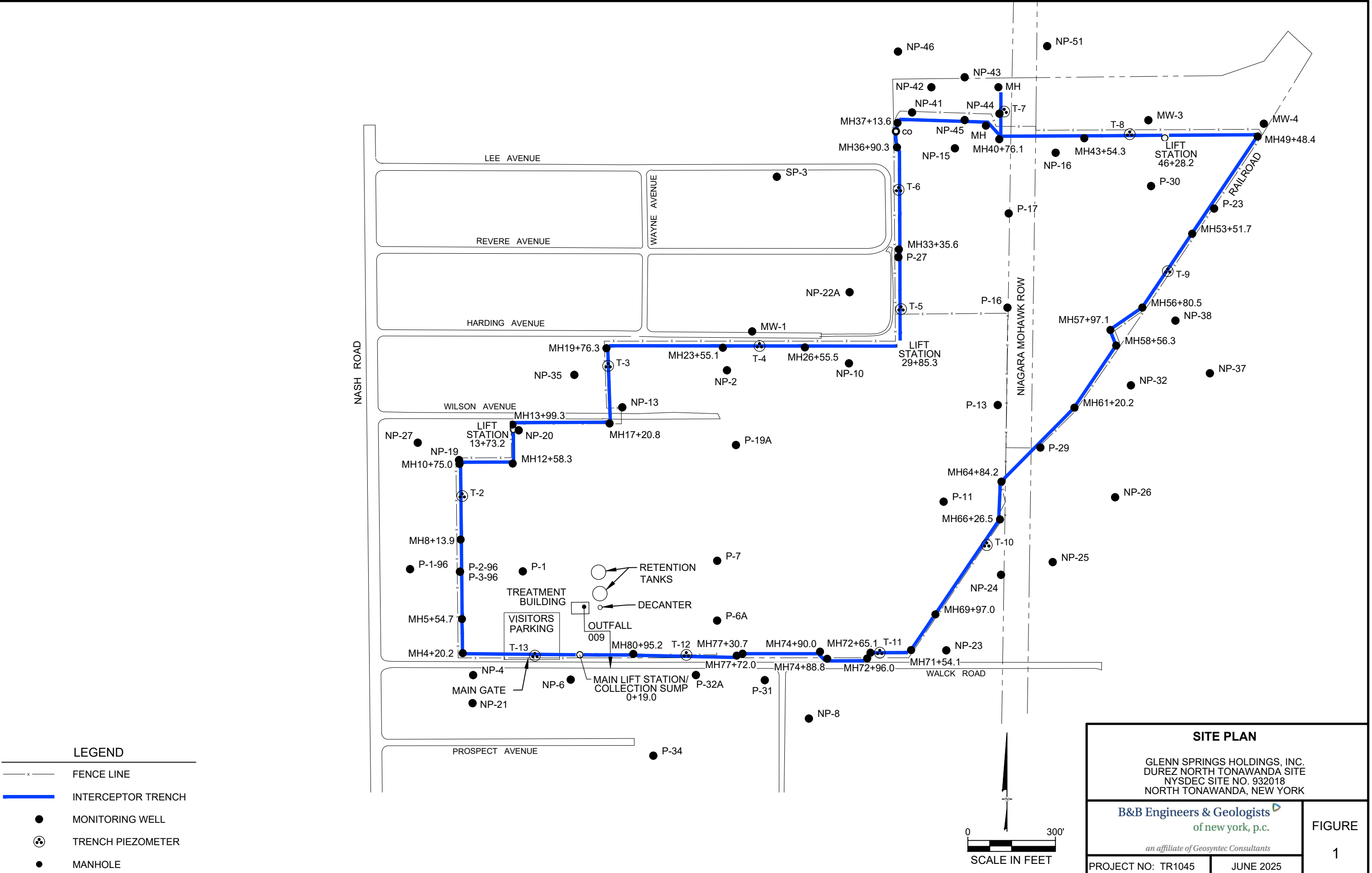
Notes:

ft. AMSL - Feet above mean sea level

Dry - No water found in well at time of measurement

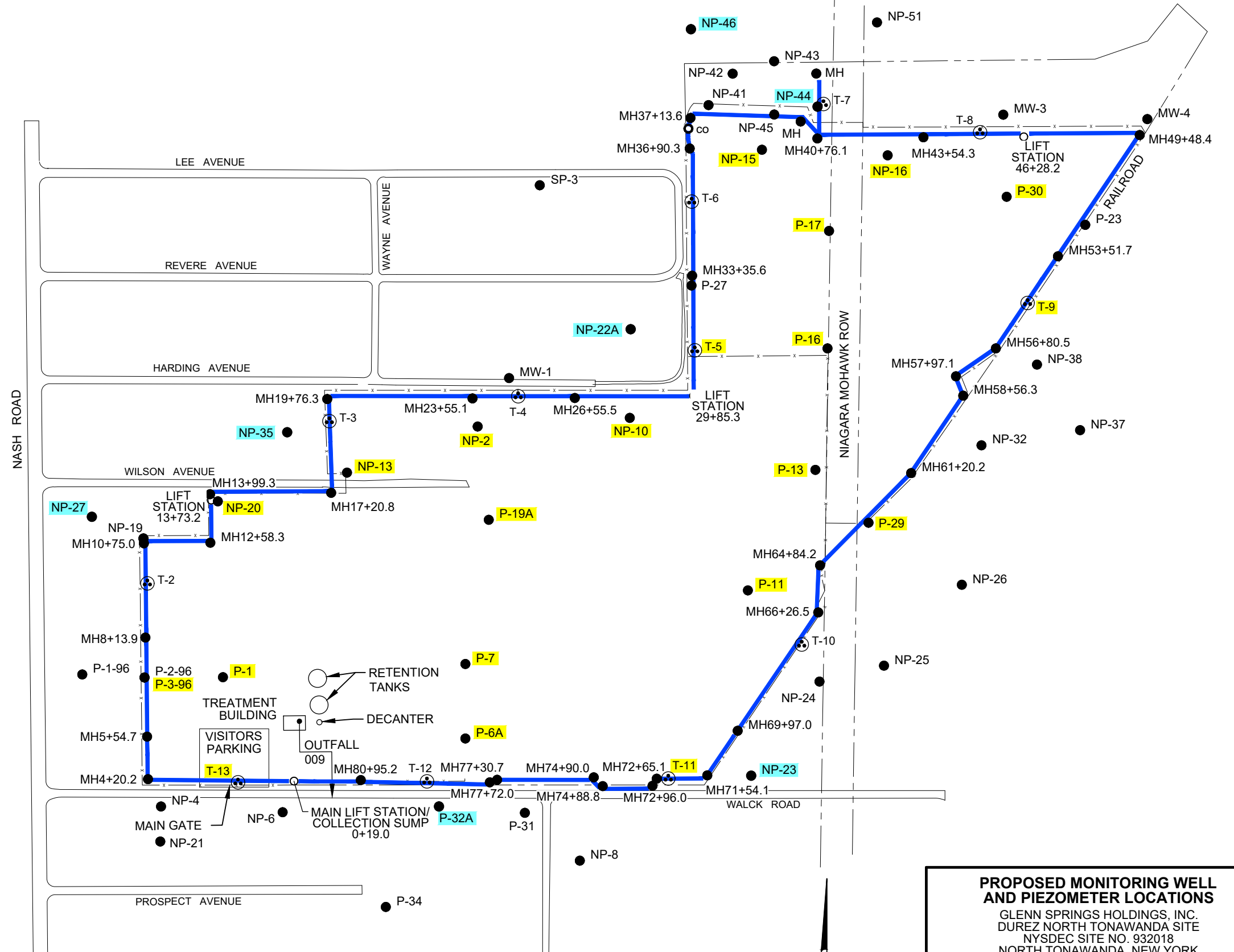
NM - Not measured

Appendix G - Figures



C:\GEO-ACC\DOCS\GEO\SYNTEC\GSH_WNY 0&M\PROJECT FILES\CADD\03_DUREZ NTRPT38_ADDITIONAL CHEM MONITORING\DRAWINGS\03-DUREZ NTRPT38 - M.Lerome 6/13/25

- LEGEND**
- FENCE LINE
 - INTERCEPTOR TRENCH
 - MONITORING WELL
 - TRENCH PIEZOMETER
 - MANHOLE
 - ANNUAL CHEMICAL MONITORING
 - PROPOSED ADDITIONAL CHEMICAL MONITORING



NOTE:
PIEZOMETERS SAMPLED WILL BE THE C PIEZOMETERS
ON THE INSIDE OF THE INTERCEPTOR TRENCH.

**PROPOSED MONITORING WELL
AND PIEZOMETER LOCATIONS**

GLENN SPRINGS HOLDINGS, INC.
DUREZ NORTH TONAWANDA SITE
NYSDEC SITE NO. 932018
NORTH TONAWANDA, NEW YORK

B&B Engineers & Geologists
of new york, p.c.
an affiliate of Geosyntec Consultants

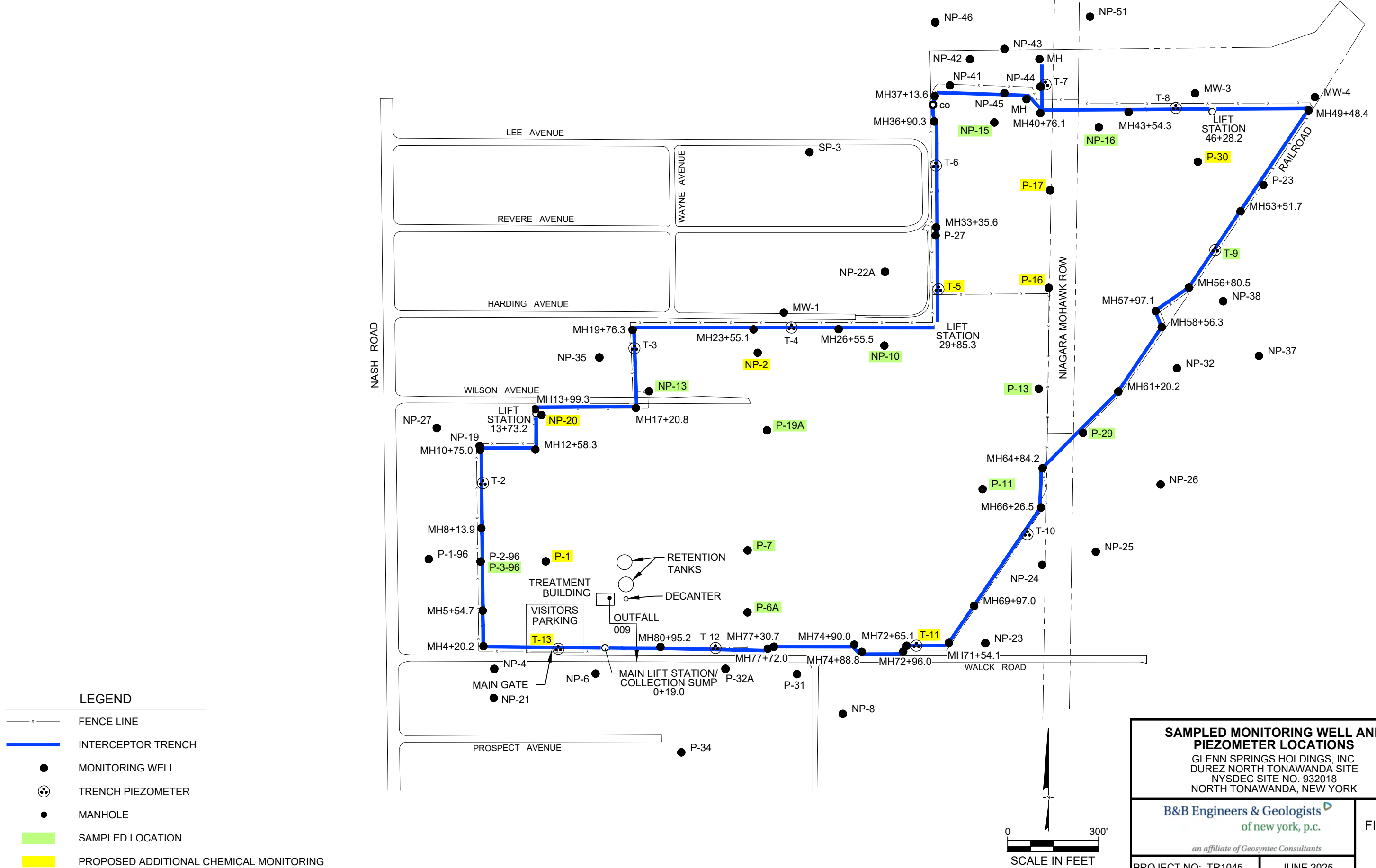
PROJECT NO: TR1045

JUNE 2025

FIGURE

2

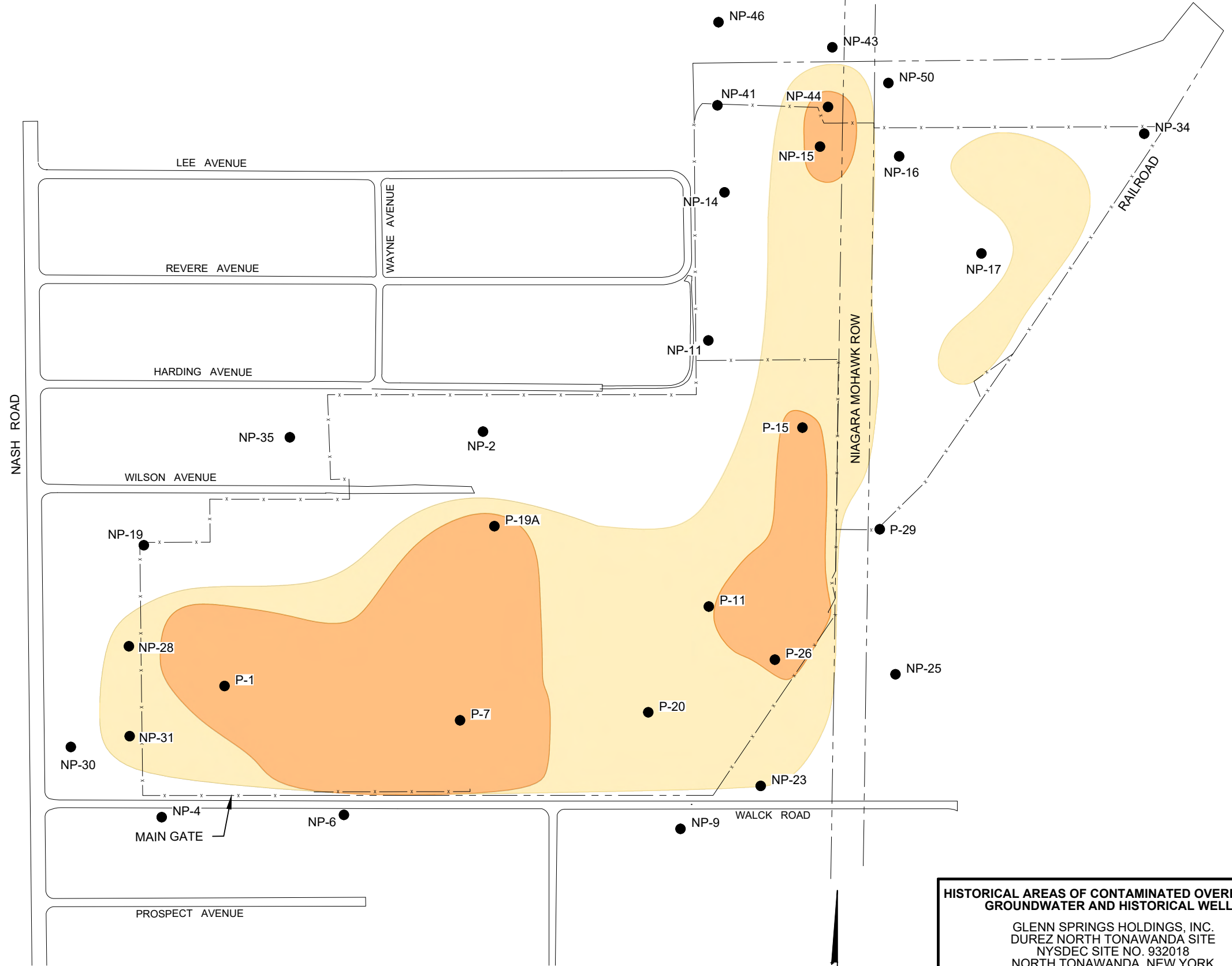
C:\GEO-ACC\DOCS\GEO\SYNTEC\GSH_WNY 0&M\PROJECT FILES\CADD\03_DUREZ NTRPT38_ADDITIONAL CHEM MONITORING\DRAWINGS\SHEETSTR1045-003 - Mlerome 6/13/25



C:\GEO-ACC\DOCS\GEO\SYNTEC\GSH_WNY O&M\PROJECT FILES\CADD\03_DUREZ NTRPT38_ADDITIONAL CHEM MONITORING\DRAWINGS\SHEETSTR1045-006 - Mlerome 6/13/25

LEGEND

- x — FENCE LINE
- HISTORICAL MONITORING WELL
- LOW TO MODERATE LEVEL OF GROUNDWATER CONTAMINATION
- HIGH LEVEL OF GROUNDWATER CONTAMINATION



NOTE: HISTORICAL MONITORING WELLS AND AREAS OF CONTAMINATION ARE APPROXIMATE, FROM FIGURE 4 OF THE 1989 RECORD OF DECISION FOR DUREZ NT.

HISTORICAL AREAS OF CONTAMINATED OVERBURDEN GROUNDWATER AND HISTORICAL WELLS

GLENN SPRINGS HOLDINGS, INC.
DUREZ NORTH TONAWANDA SITE
NYSDEC SITE NO. 932018
NORTH TONAWANDA, NEW YORK

B&B Engineers & Geologists
of new york, p.c.
an affiliate of Geosyntec Consultants

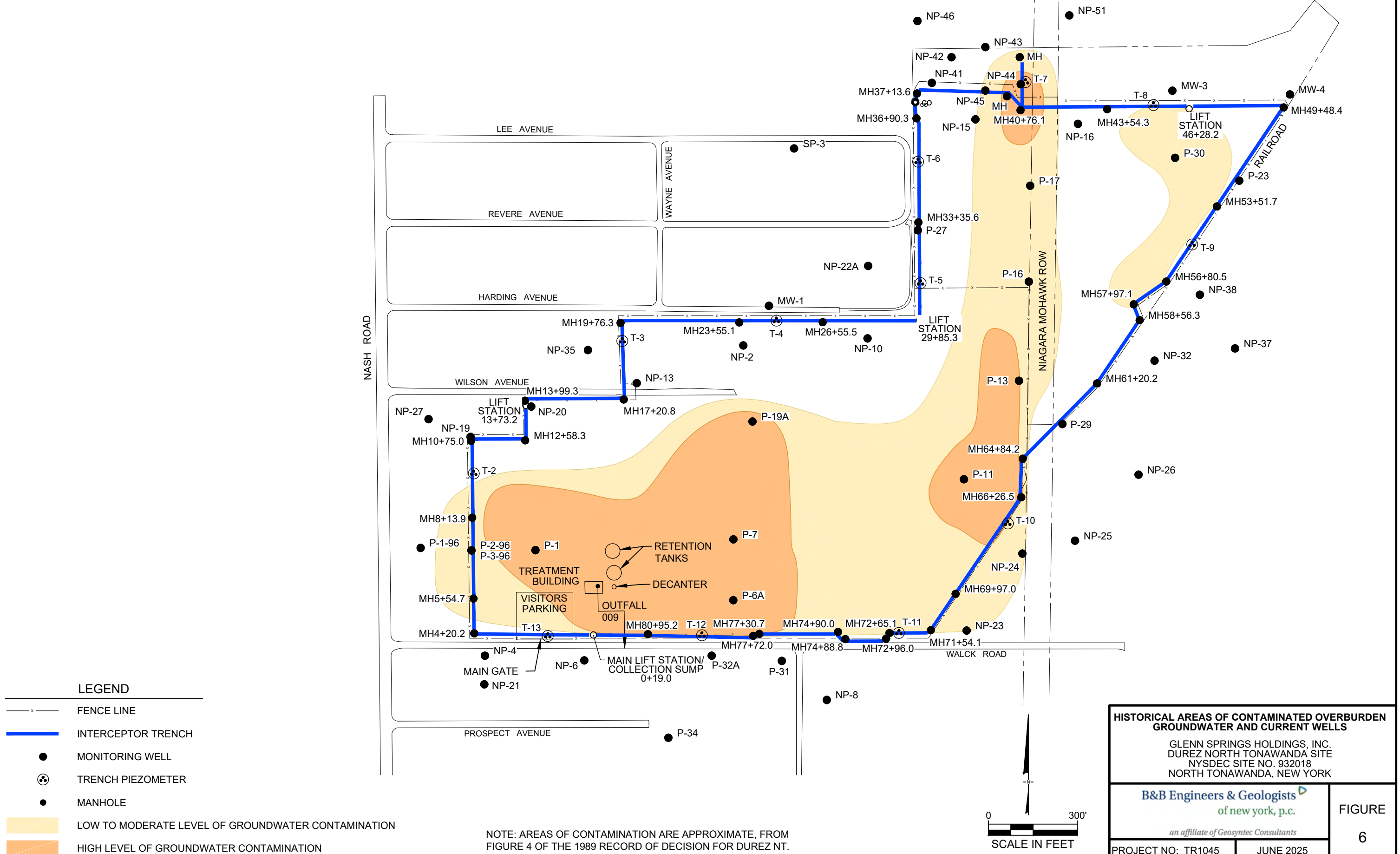
PROJECT NO: TR1045

JUNE 2025

FIGURE

5

C:\GEO-ACC\DOCS\GEO\SYNTEC\GSH_WNY 0&M\PROJECT FILES\CADD\03_DUREZ NTRPT38_ADDITIONAL CHEM MONITORING\DRAWINGS\SHEETSTR1045-004 - M.lerome 6/13/25



Appendix G - Attachment A

Purge Log/Field Notes

DUREZ NT

ADDITIONAL WELL GW
SAMPLING

MARCH 12, 2025

PROJECT # ~~TR1045~~-32A-410
FIELD FILE

DTB	NT	ADDITIONAL	W/L	S	2/28/25
9.77	NP-2 ✓	1051	5.79		
11.82	NP-10 ✓	2ND DAY 1056	7.33		
9.11	NP-13 ✓	1048	3.28		
10.20	NP-15 ✓	2ND DAY 1109	3.64		
7.53	NP-16 ✓	1116	3.20		
8.55	NP-20 ✓	1044	DRY @ 8.55		
7.60	P-1 ✓	1036	4.18		
12.63	P-6A ✓	1207	5.55		
8.14	P-7 ✓	2ND DAY 1210	2.97		
10.24	P-11 ✓	2ND DAY 1141	4.31		
11.12	P-13 ✓	2ND DAY (VOCs ONLY) 1138	6.32		
7.17	P-16 ✓	1134	3.23		
5.32	P-17 ✓	1114	3.29		
12.31	P-19A ✓	1053	5.77		
7.18	P-30 ✓	1121	DRY @ 7.18		
6.90	P-3-96 ✓	1041	4.85		
4.00	T-5C ✓	1103	2.39		
6.46	T-9C ✓	2ND DAY 1123	2.79		
7.17	T-11C ✓	1203	5.95		
5.43	T-13C ✓	1216	3.73		
4.16	P-29 ✓	1131	5.25		

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Daily Field Report

B&B Engineers & Geologists
of new york, p.c.
an affiliate of Geosyntec Consultants

Project Name: DUREZ NT GW SAMPLING Date: 3/12/2025 Page 1 of 2
Project Number: TR1045-32A-410 Primary Activities: EXTRA WELL GW SAMPLING
Field Personnel: S GARDNER
Weather: PARTLY SUNNY 28-42°F WINDS ENE 5-10MPH

Time	Descriptions of activities
1000	CALABRATE EQUIPMENT
	HORIBA 11-5000 * GSH1002 CALABRATION USING PH 4.00 AUTO
	CAL LOT# 24017887 EXP 1/2/26 (WHITE OAK)
	PH 4.00 BEFORE 4.52 AFTER 3.99
	COND 4.49 BEFORE 4.50 AFTER 4.49
	DO BEFORE 9.23 AFTER 10.60
	ORP BEFORE 312 AFTER 325
	HACH TURBIDIMETER 2100Q * GSH06215 CALABRATION CHECK
	10NTU - LOT# A2304, 100NTU - LOT# A2319, 800NTU - LOT# A2319 (HACH)
	READINGS AFTER - 10.6NTU, 100NTU - 102NTU, 800NTU - 794 NTU
1055	ONSITE DUREZ NT, TAILGATE SAFETY MEETING
	SET UP ON WELL T-13C INSTALL NEW TUBING, PURGED WELL
	DRY, LET RECOVER THAN SAMPLE IF POSSIBLE
1125	SET UP ON WELL P-1 INSTALL NEW TUBING, PURGED WELL
	DRY, LET RECOVER THAN SAMPLE IF POSSIBLE
	METHOD - LOW FLOW USING PERISTALTIC PUMP WITH NEW
	LDPE 1/4" TUBING
1210	SET UP ON WELL P-3-916, INSTALL NEW TUBING, PURGE AND
	SAMPLE (DUP - P-15-96-0325)
	TRIPBLANK - NTTRIP-03122.5 (2)
1306	CHECK W/L ON WELL NP-20 WELL DRY NO PURGING OR
	SAMPLE TAKEN
1317	SET UP ON WELL NP-13 INSTALL NEW TUBING, PURGE AND SAMPLE
1452	SET UP ON WELL P-19A INSTALL NEW TUBING, PURGE AND SAMPLE
1655	EMPTY BUCKETS OF PURGE WATER ON DECON PAD
Signature: <u>Shawn Gardner</u>	

Daily Field Report

B&B Engineers & Geologists
of new york, p.c.

an affiliate of Geosyntec Consultants

Project Name: DUREZ NT ADDITIONAL GW Date: 3/12/2025 Page 2 of 2

Project Number: TRDAS-32A-410 Primary Activities: ADDITIONAL WELL GW

Field Personnel: S GARDNER SAMPLING

Weather:

[illegible]

3/12/25 (55)

Signature: _____

re: Shawn Davidson

DUP

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410
Well Data: Well No.: P-3-96
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 6.90

Date: 3/12/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 2"
Initial Depth to Water (m/ft): 4.91
Start Purge Time: 1222

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Unit)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
1227	80	4.94	0.03	8.74	0.877	129	8.95	6.87	117
1232	80	4.94	0.03	8.48	0.883	21.3	8.69	6.98	113
1237		4.94	0.03	8.33	0.885	7.37	8.86	7.01	122
1242	80	4.94	0.03	8.25	0.888	4.59	8.93	7.03	130

Sample ID: P-3-96-0325
Notes: BLIND DUPLICATE - P-15-96

Sample Time: 1245
TIME - 1245

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings $\pm 3\%$

Shawn Gardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410
Well Data: Well No.: NP-13
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): _____

Date: 3/12/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.5"
Initial Depth to Water (m/ft): 1.31
Start Purge Time: 1330

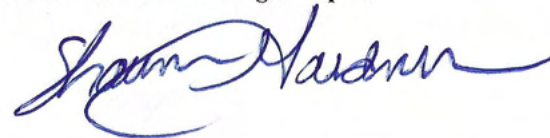
Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
1334	100	2.39	1.08	8.42	1.01	379	1.03	7.25	-168
1339	100	2.61	1.30	8.06	1.02	>1000	0.75	7.20	-129
1344		2.69	1.38	7.73	1.06	>1000	0.67	7.09	-104
1349	100	2.77	1.46	7.51	1.07	639	0.63	6.99	-92
1354		2.81	1.50	7.29	1.09	236	0.60	6.97	-77
1359	100	2.84	1.53	7.14	1.10	150	0.58	6.95	-84
1404		2.87	1.56	6.99	1.11	122	0.59	6.94	-75
1409	100	2.88	1.57	6.87	1.11	89.0	0.57	6.93	-65
1414	100	2.91	1.60	6.72	1.12	69.3	0.56	6.93	-66
1419		2.92	1.61	6.82	1.13	61.3	0.57	6.93	-70
1424	100	2.93	1.62	6.65	1.14	56.7	0.57	6.94	-71
1429	100	2.95	1.64	6.58	1.14	52.2	0.56	6.93	-71

Sample ID: NP-13-0325

Sample Time: 1435

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_a = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm. For Imperial units, $V_a = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings ±3%



Monitoring Well Record for Low-Flow Purging

Start Purge Time: 1505

Sample Time: 1630

Shawn Hardin

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TRIO45-32A-410
Well Data: Well No.: P-19A
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 12.31

Date: 3/2/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 2"
Initial Depth to Water (m/ft): 5.42
Start Purge Time: 1505

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Unit)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
1510	100	5.98	0.56	6.09	2.66	83.5	7.98	7.04	140
1515	100	6.21	0.79	6.01	2.68	68.2	7.69	7.00	144
1520		6.31	0.89	5.97	2.70	264	6.84	7.00	145
1525	100	6.38	0.96	5.90	2.68	191	7.49	6.98	130
1530		6.43	1.01	5.85	2.85	330	2.79	6.90	101
1535	100	6.48	1.06	5.80	2.90	388	2.43	6.66	11
1540	100	6.52	1.10	5.86	2.91	289	2.36	6.65	9
1545		6.54	1.12	5.88	2.91	221	2.27	6.64	6
1550		6.55	1.13	5.91	2.91	161	2.09	6.64	5
1555	100	6.62	1.20	5.89	2.92	135	1.97	6.63	2
1600		6.65	1.23	5.85	2.92	127	2.01	6.63	2
1605	100	6.66	1.24	5.81	2.94	84.6	1.97	6.63	1
1610		6.65	1.23	5.86	2.93	60.9	2.11	6.63	-1

Sample ID: P-19A-0325

Sample Time: _____

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm.
For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings ±3%

Shawn Gardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TRIOAS-32A-410

Well Data: Well No.: NP-20
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 8.55

Date: 3/12/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 4"
Initial Depth to Water (m/ft): _____
Start Purge Time: _____

[illegible]

Sample ID: _____

Sample Time: _____

Notes:

- (1) The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- (2) The wall screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_a = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm.
For Imperial units, $V_a = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- (3) The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- (4) Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- (5) For conductivity, the average value of three readings $\pm 3\%$

Volumes Purged = Vp/Vs.

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410
Well Data: Well No.: P-1
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 7.60

Date: 3/12/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.25
Initial Depth to Water (m/ft): 4.38
Start Purge Time: 1139

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Unit)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
1153	96	6.71	2.33	14.03	0.246	438	1.93	5.99	45
1157	WELL WENT DRY WHILE PURGING, NO MORE READINGS TAKEN DUE TO INSUFFICIENT VOLUME FINAL W/L 7.43								
3/13/25	W/L 7.38	@OT:17	WELL DIDN'T RECOVER, NO SAMPLE TAKEN						

Sample ID: _____

Sample Time: _____

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings $\pm 3\%$

Shawn Gardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: _____
Well Data: Well No.: T-13C
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 5.43

Date: 3/12/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.5"
Initial Depth to Water (m/ft): 4.87
Start Purge Time: 1111

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
* WELL WENT DRY WHILE PURGING, NO READINGS TAKEN DUE TO INSUFFICIENT VOLUME									
FINAL W/L - 5.20									
3/13/25 W/L 5.12 @ 0710 WELL DIDN'T RECOVER NO SAMPLE TAKEN									

Sample ID: _____

Sample Time: _____

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_a = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm. For Imperial units, $V_a = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings $\pm 3\%$

Shawn Gardner

DUREZ NT

ADDITIONAL WELL GW
SAMPLING

MARCH 13, 2025

PROJECT # TRIOAS-32A-410

FIELD FILE

Daily Field Report

B&B Engineers & Geologists^D
of new york, p.c.
an affiliate of Geosyntec Consultants

Project Name: DUREZ NT GW SAMPLING Date: 3/13/25 Page 1 of 2
Project Number: TR1045-32A-410 Primary Activities: ADDITIONAL WELL SAMPLING
Field Personnel: S GARDNER
Weather: CLEAR 27-50°F WINDS ENE 5-10MPH

Time	Descriptions of activities
0556	ONSITE SG @ LC, CALABRATE AND LOAD EQUIPMENT
	HORIBA U-5000 * GSH1002 CALABRATION USING PH 4.00 AUTO
	CAL LOT# 24017887 EXP. 1/21/26 (WHITE OAK)
	PH 4.00 BEFORE 4.24 AFTER 3.99
	COND 4.49 BEFORE 4.43 AFTER 4.49
	DO BEFORE 10.94 AFTER 10.39
	ORP BEFORE 287 AFTER 304
	HACH TURBIDIMETER 2100Q * GSH06215 CALABRATION CHECK
	IONTU - LOT# A2304, 100NTU - LOT# A2319, 800NTU - A2319 (HACH)
	READINGS AFTER IONTU - 10.0, 100NTU - 103, 800NTU - 799
0700	ONSITE @ DUREZ NT, TAILGATE SAFETY MEETING
0710	CHECK W/L ON WELL T-13C, WELL DIDNT RECOVER, NO SAMPLE TAKEN
0717	CHECK W/L ON WELL P-1, WELL DIDNT RECOVER, NO SAMPLE TAKEN
0725	SET UP ON WELL NP-2, INSTALL NEW TUBING, PURGED WELL DRY LET RECOVER, THAN ATTEMPT TO SAMPLE
0810	SETUP ON WELL NP-10, INSTALL NEW TUBING, PURGED WELL DRY, LET RECOVER, THAN ATTEMPT TO SAMPLE
0904	SETUP ON WELL T-5C, INSTALL NEW TUBING, PURGED WELL DRY, LET RECOVER, THAN ATTEMPT TO SAMPLE
0939	SETUP ON WELL NP-15, INSTALL NEW TUBING, PURGED WELL DRY LET RECOVER, THAN ATTEMPT TO SAMPLE
1032	SETUP ON WELL P-17, INSTALL NEW TUBING, PURGED WELL DRY LET RECOVER, THAN ATTEMPT TO SAMPLE

Signature: Shawn Gardner

Daily Field Report

B&B Engineers & Geologists
of new york, p.c.

an affiliate of Geosyntec Consultants

Project Name: DUREZ NT GW SAMPLING Date: 3/13/25 Page 2 of 2

Project Number: TR1045-32A-410 Primary Activities: ADDITIONAL WELL GW

Field Personnel: S GARDNER SAMPLING

Weather: SUNNY 40-50°F WINDS NW 0-5MPH

[illegible]

Signature:

Shayne Hardman

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410

Well Data: Well No.: P-30
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): _____

Date: 3/13/2025
 Personal: S GARDNER
 Well Diameter, D (cm/in): 1.25"
 Initial Depth to Water (m/ft): _____
 Start Purge Time: _____

[illegible]

Sample ID: _____

Sample Time: _____

Notes:

- (1) The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- (2) The wall screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_a = n \cdot (r^2) \cdot L$ in mL, where $(r = D/2)$ and L are in cm.
For Imperial units, $V_a = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- (3) The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- (4) Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- (5) For conductivity, the average value of three readings $\pm 3\%$

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Sham Hardin

B&B Engineers & Geologists
of new york, p.c.

an affiliate of Geosyntec Consultants

Monitoring Well Record for Low-Flow Purging

MS/MSD

Project Data: Project Name: PUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410
Well Data: Well No.: NP-116
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 7.53

Date: 3/13/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.25"
Initial Depth to Water (m/ft): 2.95
Start Purge Time: 1121

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾	±3%	±3%	±10%	±10%	±0.1	±10
1125	100	4.02	1.07	7.12	0.932	158	5.51	7.51	27
1130	100	4.38	1.43	6.96	0.874	68.9	8.06	7.33	41
1135		4.50	1.55	7.07	0.849	32.7	9.12	7.28	39
1140	100	4.54	1.59	7.40	0.845	15.3	9.24	7.25	39
1145		4.56	1.61	7.89	0.834	9.92	9.36	7.24	49
1150	100	4.58	1.63	8.30	0.826	8.48	9.36	7.23	60
1155	100	4.62	1.67	8.77	0.816	8.36	9.27	7.23	64
1200		4.64	1.69	9.10	0.805	5.18	9.10	7.21	74
1205	100	4.67	1.72	9.21	0.802	2.62	9.09	7.20	79
1210	100	4.67	1.72	9.30	0.801	2.64	9.07	7.19	83

Sample ID: NP-116-0325

Sample Time: 1215

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The wall screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm.
For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings ±3%

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Shawn Gardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410
Well Data: Well No.: P-29
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 4.16

Date: 3/13/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.25"
Initial Depth to Water (m/ft): 2.88
Start Purge Time: 1351

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽³⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
1356	100	3.11	0.23	8.92	0.652	11.5	0.97	7.05	-120
1401	100	3.11	0.23	5.62	0.457	51.9	1.36	7.12	-119
1406		3.12	0.24	4.87	0.390	28.9	1.66	7.22	-105
1411	100	3.12	0.24	4.69	0.368	22.7	1.93	7.23	-92
1416	100	3.12	0.24	4.57	0.355	25.8	2.18	7.28	-80
1421		3.12	0.24	4.50	0.341	24.3	2.52	7.28	-67
1426	100	3.12	0.24	4.42	0.333	23.6	2.76	7.28	-54
1431		3.12	0.24	4.38	0.326	22.1	3.02	7.30	-44
1436	100	3.12	0.24	4.41	0.323	21.8	3.20	7.30	-37

Sample ID: P-29-0325

Sample Time: 1440

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings ±3%

Shawn Gardner

DUREZ NT

ADDITIONAL WELL GW
SAMPLING

MARCH 14, 2025

PROJECT # IRIOAS-32A-410

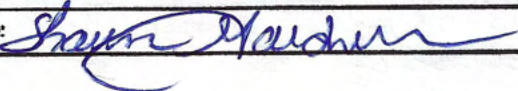
FIELD FILE

Daily Field Report

B&B Engineers & Geologists^D
 of new york, p.c.
 an affiliate of Geosyntec Consultants

Project Name: DUREZ NT GW SAMPLING Date: 3/14/2025 Page 1 of 2
 Project Number: TRIOAS-32A-410 Primary Activities: ADDITIONAL WELL GW
 Field Personnel: S GARDNER SAMPLING
 Weather: CLEAR 26-70°F WINDS E 5-10MPH

Time	Descriptions of activities
0555	ONSITE SG @ LC CALABRATE AND LOAD EQUIPMENT
	HORIBA U-5000 * 6SH1002 CALABRATION USING PH 4.00 AUTO
	CAL LOT# 24017887 EXP 1/21/26 (WHITE OAK)
	PH 4.00 BEFORE 4.07 AFTER 3.99
	COND 4.49 BEFORE 4.46 AFTER 4.49
	DO BEFORE 10.54 AFTER 10.36
	ORP BEFORE 283 AFTER 302
	HACH TURBIDIMETER 21000 * 6SH06215 CALABRATION CHECK
	100NTU - LOT# A2304, 100NTU - LOT# A2319, 800NTU - LOT# A2319
	READINGS AFTER - 100NTU - 10.7, 100NTU - 10.4, 800NTU - 796
0705	ONSITE SG @ DUREZ NT TAILGATE SAFETY MEETING
0715	CHECK W/L ON WELL NR-2, WELL DIDN'T RECOVER NO
	SAMPLE TAKEN
0725	CHECK W/L ON WELL NP-10 ENOUGH WATER TO SAMPLE
	SET UP AND TAKE SAMPLE
	TRIPBLANK - NTTRIP - 031425(2)
0753	CHECK W/L ON WELL T-SC WELL DIDN'T RECOVER, NO
	SAMPLE TAKEN
0802	CHECK W/L ON WELL NP-15 ENOUGH WATER TO SAMPLE
	SET UP AND TAKE SAMPLE
0823	CHECK W/L ON WELL P-17, WELL DIDN'T RECOVER, NO
	SAMPLE TAKEN
0835	CHECK W/L ON WELL T-9C ENOUGH WATER TO SAMPLE
	SET UP AND TAKE SAMPLE
0900	SET UP ON WELL P-16 INSTALL NEW TUBING, WELL PURGED

Signature: 

Daily Field Report

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Project Name: DUREZ NT GW SAMPLING Date: 3/14/2025 Page 2 of 2

Project Number: TR1045-32A-410 Primary Activities: ADDITIONAL WELL GW

Field Personnel: S GARDNER SAMPLING

Weather: SUNNY 30-70°F WINDS E S-10MPH

[illegible]

Signature: _____

e: Sharon Hardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TRID45-32A-410
Well Data: Well No.: NP-2
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 9.77

Date: 3/13/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.5"
Initial Depth to Water (m/ft): 5.20
Start Purge Time: 0740

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
0745	84	7.02	1.82	12.96	0.234	204	0.91	5.65	36
0750	84	8.50		11.84	0.187	151	1.29	6.01	-70
0754 WELL WENT DRY WHILE PURGING, NO MORE READINGS TAKEN DUE TO INSUFFICIENT VOLUME FINAL W/L 9.54									
3/14/25 0710 CHECK W/L ON WELL, DIDN'T RECOVER NO SAMPLE TAKEN W/L-9.49									

Sample ID: _____

Sample Time: _____

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L(2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings ±3%

S. Gardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410

Well Data: Well No.: T-5C
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 4.00

Date: 3/13/2025
 Personal: S GARDNER
 Well Diameter, D (cm/in): 1.5"
 Initial Depth to Water (m/ft): 1.78
 Start Purge Time: 0915

[illegible]

Sample ID: _____

Sample Time: _____

Notes:

- Notes:
- (1) The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
 - (2) The wall screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm.
For Imperial units, $V_s = n \cdot (r^2) \cdot L(2.54)^3$, where r and L are in inches
 - (3) The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
 - (4) Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
 - (5) For conductivity, the average value of three readings $\pm 3\%$

Shawn Hardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410
Well Data: Well No.: P-17
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 5.32

Date: 3/13/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.25"
Initial Depth to Water (m/ft): 3.26
Start Purge Time: 1043

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Unit)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
1051 WELL WENT DRY WHILE PURGING, NO READINGS TAKEN DUE TO INSUFFICIENT VOLUME FINAL W/L 5.18									
3/14/25 0823 CHECK W/L ON WELL, DIDN'T RECOVER, NO SAMPLE TAKEN W/L 5.17									

Sample ID: _____

Sample Time: _____

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings ±3%

Shawn Gardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410
Well Data: Well No.: NP-10
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 11.82

Date: 3/13/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.5"
Initial Depth to Water (m/ft): 4.58
Start Purge Time: 0820

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Unit)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
0832	88	7.14	2.56	7.07	0.863	212	0.81	5.90	-34
0837	88	9.80	5.22	6.30	0.939	153	0.73	5.98	-52
0842		11.22		6.24	0.904	147	0.84	5.99	-74
0843	WELL WENT DRY WHILE PURGING, NO MORE READINGS TAKEN DUE TO INSUFFICIENT VOLUME. FINAL W/L 11.28								
(0725 3/14/25	CHECK W/L - 9.72 SET UP ON WELL, TAKE SAMPLE								

3/14/25
Sample ID: NP-10-0325

Sample Time: 0740

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = \pi \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm.
For Imperial units, $V_s = \pi \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings $\pm 3\%$

Stephen Gardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410
Well Data: Well No.: NP-15
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): ~~10.20~~ 10.65

Date: 3/13/2025
Personal: S GARDNER
Well Diameter, D (cm/in): _____
Initial Depth to Water (m/ft): 2.55
Start Purge Time: 0948

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
0954	96	4.30	1.75	5.06	1.39	86.5	1.44	6.98	-147
0959	96	5.94	3.39	5.27	1.38	46.2	0.89	7.15	-158
1004		7.44	4.89	5.53	1.36	79.4	0.78	7.22	-156
1009	96	9.18		5.65	1.23	65.1	1.64	7.26	-151
1013	WELL WENT DRY WHILE PURGING, NO MORE READINGS TAKEN DUE TO INSUFFICIENT VOLUME FINAL W/L - 10.33								
3/14/25 0802	CHECK W/L 3.28, SET UP ON WELL TAKE SAMPLE								

3/14/25
Sample ID: NP-15-0325

Sample Time: 0815

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm.
For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings ±3%

[Signature]

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410
Well Data: Well No.: T-9C
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 6.46

Date: 3/13/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.5"
Initial Depth to Water (m/ft): 2.82
Start Purge Time: 1258

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft) Precision regular ⁽⁵⁾ :	Temp (°C) ±3%	Conductivity (mS/cm) ±3%	Turbidity (NTU) ±10%	DO (mg/L) ±10%	pH (Units) ±0.1	ORP (mV) ±10
1302	100	4.55	1.73	10.70	0.708	257	1.16	7.16	110
1307	100	5.28	2.46	8.07	0.727	142	1.29	7.11	37
1312		5.60	2.78	7.77	0.807	96.0	0.95	6.96	45
1317	100	5.92	3.10	7.49	0.814	38.8	0.87	6.97	64
1322		6.28	3.46	7.26	0.815	23.1	0.88	6.98	71
1326	WELL WENT DRY WHILE PURGING, NO MORE READINGS TAKEN DUE TO INSUFFICIENT VOLUME FINAL W/L - 6.42								
3/14/25 0835	CHECK W/L - 2.97 SET UP ON WELL TAKE SAMPLE								

3/14/25 Sample ID: T-9C-0325

Sample Time: 0845

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r = D/2)$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings $\pm 3\%$

Shawn Gardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-324-410
Well Data: Well No.: P-6A
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 12.63

Date: 3/14/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.25"
Initial Depth to Water (m/ft): 6.30
Start Purge Time: 1317

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
1322	100	6.32	0.02	19.11	0.934	229	0.58	6.80	-146
1327	100	6.32	0.02	18.26	0.954	58.5	0.42	6.90	-134
1332		6.32	0.02	17.53	0.977	17.1	0.38	6.91	-132
1337	100	6.32	0.02	16.80	1.00	5.59	0.35	6.91	-132
1342	100	6.32	0.02	16.62	1.01	5.18	0.34	6.91	-132
1347	100	6.32	0.02	16.49	1.02	3.60	0.34	6.92	-131

Sample ID: P-6A-0325

Sample Time: 1350

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The wall screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches.
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings ±3%

Shawn Gardner

DUREZ NT

ADDITIONAL WELL GW
SAMPLING

MARCH 15, 2025

PROJECT # TR1045-32A-410
FIELD FILE

Daily Field Report

B&B Engineers & Geologists
of new york, p.c.

an affiliate of Geosyntec Consultants

Project Name: DUREZ NT ADDITIONAL GW Date: 3/15/2025 Page 1 of 1

Project Number: TR1045-32A-410 Primary Activities: ADDITIONAL WELL GW

Field Personnel: S GARDNER SAMPLING

Weather: CLOUDY 53°F WINDS S S-15MPH

[illegible]

3/15/25 (36)

Signature: Sharon Aardun

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410
Well Data: Well No.: T-11C
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 5.43 @ 7.15

Date: 3/14/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.25"
Initial Depth to Water (m/ft): 6.62
Start Purge Time: _____

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
1205	WELL WENT DRY WHILE PURGING NO MORE READING TAKEN DUE TO INSUFFICIENT VOLUME FINAL W/L - 6.88								
3/15/25 0828	CHECK W/L ON WELL DIDN'T RECOVER NO SAMPLE TAKEN W/L - 6.81								

Sample ID: _____

Sample Time: _____

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches.
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings $\pm 3\%$

Shawn Gardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410
Well Data: Well No.: P-16
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 7.17

Date: 3/14/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.25"
Initial Depth to Water (m/ft): 3.22
Start Purge Time: 0921

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
0926	88	5.19	1.97	16.33	0.412	177	0.69	7.77	54
0931		6.25	3.03	15.92	0.406	135	0.89	7.87	66
0932	PURGED WELL DRY, NO MORE READINGS TAKEN DUE TO INSUFFICIENT VOLUME FINAL W/L 6.92								
3/15/25 0717	CHECK W/L ON WELL, DIDNT RECOVER, NO SAMPLE TAKEN W/L- 6.85								

Sample ID: _____

Sample Time: _____

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r = D/2)$ and L are in cm.
For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings $\pm 3\%$

Shawn Gardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410
Well Data: Well No.: P-11
Constructed Well Depth (m/ft): 10.24 (36)
Measured Well Depth (m/ft): 10.24

Date: 3/14/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.25"
Initial Depth to Water (m/ft): 4.00
Start Purge Time: 1021

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
1028	100	6.69	2.69	9.02	0.253	268	0.88	7.47	-115
1033	100	8.18	4.18	7.99	0.244	196	1.49	7.72	-99
1037	WELL WENT DRY WHILE PURGING. NO MORE READINGS TAKEN DUE TO INSUFFICIENT VOLUME FINAL W/L 9.90 APROX 0.12' OF SEDIMENTS AT BOTTOM								
(3/15/25 0733)	CHECK W/L -7.01 SET UP ON WELL TAKE SAMPLE								

3/15/25
Sample ID: P-11-0325

Sample Time: 0740

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The wall screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings $\pm 3\%$

Shawn Gardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-410
Well Data: Well No.: P-13
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 11.12

Date: 3/14/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.25"
Initial Depth to Water (m/ft): 3.78
Start Purge Time: 1057

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
1101	100	5.52	1.74	10.89	0.401	175	0.81	7.30	-164
1106	100	7.42	3.64	11.07	0.380	94.0	0.68	7.27	-213
1111		8.89	5.11	10.69	0.295	112	1.85	7.38	-171
1116	100	10.60	6.82	10.46	0.262	144	2.19	7.59	-155
1117	WELL WENT DRY WHILE PURGING, NO MORE READINGS TAKEN DUE TO INSUFFICIENT VOLUME FINAL W/L - 10.89								
3/15/25	0754 CHECK W/L 10.23, SET UP AND ATTEMPT TO TAKE SAMPLE								
	* 10000 SAMPLE VOC'S ONLY PARTIAL								

3/15/25 Sample ID: P-13-0325

Sample Time: 0800

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where $(r=D/2)$ and L are in cm.
For Imperial units, $V_s = n \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings $\pm 3\%$

S. Gardner

Monitoring Well Record for Low-Flow Purging

Project Data: Project Name: DUREZ NT ADDITIONAL WELL GW
Project Number: TR1045-32A-A10
Well Data: Well No.: P-7
Constructed Well Depth (m/ft): _____
Measured Well Depth (m/ft): 8.14

Date: 3/14/2025
Personal: S GARDNER
Well Diameter, D (cm/in): 1.25"
Initial Depth to Water (m/ft): 3.18
Start Purge Time: 1237

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temp (°C)	Conductivity (mS/cm)	Turbidity (NTU)	DO (mg/L)	pH (Units)	ORP (mV)
			Precision regular ⁽⁵⁾ :	±3%	±3%	±10%	±10%	±0.1	±10
1240	100	4.65	1.47	17.54	1.71	214	0.78	6.72	-162
1245	100	6.13	2.95	16.37	1.34	108	0.49	6.92	-210
1250		7.54	4.36	15.58	1.33	136	0.52	6.93	-209
1252	WELL WENT DRY WHILE PURGING, NO MORE READINGS TAKEN DUE TO INSUFFICIENT VOLUME FINAL W/L - 7.94								
3/15/25 0845	CHECK W/L 3.57 SETUP ON WELL TAKE SAMPLE								

3/15/25
Sample ID: P-7-0325

Sample Time: 0855

Notes:

- (1) The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2ft) above any sediment accumulated at the well bottom.
- (2) The wall screen volume will be based on a 1.52 m (5ft) screen length (L). For metric units $V_s = n \cdot (r^2) \cdot L$ in mL, where (r=D/2) and L are in cm. For Imperial units, $V_s = n \cdot (r^2) \cdot L (2.54)^3$, where r and L are in inches
- (3) The drawdown from the initial water level should not exceed 0.1 m (0.3ft). The pumping rate should not exceed 500 mL/min.
- (4) Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- (5) For conductivity, the average value of three readings $\pm 3\%$

Shawn Gardner

Appendix G - Attachment B

Data Validation Report



Data Verification Report

April 11, 2025

To	Dennis Hoyt (Dhoyt@Geosyntec.com); Lindsay Osterman (Lindsay.Osterman@geosyntec.com); Alden Wells (Alden.Wells@geosyntec.com)	Project No.	11223794
Copy to	File	Email	Alicia.ferber@ghd.com
From	Alicia Ferber/cs/89-NF	Contact No.	720-245-2755
Project Name	GSHDM: Durez NT Data Mgmt.		
Subject	Analytical Results and Data Verification Additional Groundwater Sampling Glenn Springs Holdings, Inc. - Durez NT North Tonawanda, New York March 2025		

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

1. Introduction

This document details a data verification of analytical results for groundwater samples collected in support of the Additional Groundwater Sampling at the Durez NT site during March 2025. Samples were submitted to ALS Environmental located in Rochester, New York. A sample collection and analysis summary is presented in Table 1. The validated analytical results are summarized in Table 2. A summary of the analytical methodology is presented in Table 3.

Standard GHD report deliverables were submitted by the laboratory. The final results and supporting quality assurance/quality control (QA/QC) data were assessed. Evaluation of the data was based on information obtained from the chain of custody forms, finished report forms, method blank data, recovery data from surrogate spikes/laboratory control samples (LCS)/matrix spikes (MS), and field QA/QC samples.

The QA/QC criteria by which these data have been assessed are outlined in the analytical methods referenced in Table 3 and applicable guidance from the documents entitled:

1. "National Functional Guidelines for Organic Superfund Methods Data Review",
United States Environmental Protection Agency (USEPA) 540-R-20-005, November 2020
2. "National Functional Guidelines for Inorganic Superfund Methods Data Review",
USEPA 542-R-20-006, November 2020

These items will subsequently be referred to as the "Guidelines" in this report.

2. Sample Holding Time and Preservation

The sample holding time criteria for the analyses are summarized in Table 3. Sample chain of custody documents and the analytical reports were used to determine sample holding times. All samples were analyzed within the required holding times.

All samples were properly preserved, delivered on ice, and stored by the laboratory at the required temperature (0-6°C).

3. Laboratory Method Blank Analyses

Method blanks are prepared from a purified matrix and analyzed with investigative samples to determine the existence and magnitude of sample contamination introduced during the analytical procedures.

For this study, laboratory method blanks were analyzed at a minimum frequency of one per analytical batch.

Most method blank results were non-detect, indicating that laboratory contamination was not a factor for this investigation. Low-level detections were reported for 1,2,3-trichlorobenzene. Most associated sample results were non-detect and were not impacted and were reported without qualification. Results with similar detections to the blank were qualified non-detect at the reporting limit as shown in Table 4.

4. Surrogate Spike Recoveries

In accordance with the methods employed, all samples, blanks, and QC samples analyzed for organics are spiked with surrogate compounds prior to sample analysis. Surrogate recoveries provide a means to evaluate the effects of laboratory performance on individual sample matrices.

All samples submitted for volatile organic compound (VOC) determinations were spiked with the appropriate number of surrogate compounds prior to sample analysis.

Surrogate recoveries were assessed against laboratory control limits. All surrogate recoveries were within the laboratory control limits.

5. Laboratory Control Sample Analyses

LCS are prepared and analyzed as samples to assess the analytical efficiencies of the methods employed, independent of sample matrix effects.

For this study, LCS were analyzed at a minimum frequency of one per analytical batch.

Organic Analyses

The LCS contained all compounds of interest. All LCS recoveries were within the laboratory control limits, demonstrating acceptable analytical accuracy.

Inorganic Analyses

The LCS contained all analytes of interest. LCS recoveries were assessed per the "Guidelines" using the laboratory control limits. All LCS recoveries were within the control limits, demonstrating acceptable analytical.

6. Matrix Spike/Matrix Spike Duplicate (MS/MSD) Analyses

To evaluate the effects of sample matrices on the preparation process, measurement procedures, and accuracy of a particular analysis, samples are spiked with a known concentration of the analyte of concern and analyzed as MS/MSD samples. The relative percent difference RPD between the MS and MSD is used to assess analytical precision.

MS/MSD analyses were performed as specified in Table 1.

Organic Analyses

The MS/MSD samples were spiked with all compounds of interest. All percent recoveries and RPD values were within the laboratory control limits, demonstrating acceptable analytical accuracy and precision.

Inorganic Analyses

The MS/MSD samples were spiked with the analytes of interest, and the results were evaluated per the "Guidelines" using the laboratory control limits. All percent recoveries and RPD values were within the control limits, demonstrating acceptable analytical accuracy and precision.

7. Field QA/QC Samples

The field QA/QC consisted of two trip blank samples and one field duplicate sample set.

Trip Blank Sample Analysis

To evaluate contamination from sample collection, transportation, storage, and analytical activities, two trip blank samples were submitted to the laboratory for VOC analysis. Most results were non-detect for the compounds of interest. Low level detections of toluene and 1,2,3-trichlorobenzene were found in one of the trip blanks. Most associated results were non-detect and were reported without qualification. Results that had similar detections to the trip blank were qualified as non-detect at the reporting limit (see Table 5).

Field Duplicate Sample Analysis

To assess the analytical and sampling protocol precision, one field duplicate sample set was collected and submitted "blind" to the laboratory, as specified in Table 1. The RPDs associated with these duplicate samples must be less than 50 percent for water samples. If the reported concentration in either the investigative sample or its duplicate is less than five times the reporting limit (RL), the evaluation criterion is one times the RL value.

All field duplicate results met the above criteria, demonstrating acceptable sampling and analytical precision.

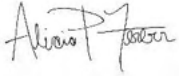
8. Analyte Reporting

The laboratory reported detected results down to the laboratory's sample-specific method detection limit (MDL) for each analyte. Positive analyte detections less than the RL but greater than the sample-specific MDL were qualified as estimated (J) in Table 2 unless qualified otherwise in this report. Non-detect results were presented as non-detect at the RL in Table 2.

9. Conclusion

Based on the assessment detailed in the foregoing, the data summarized in Table 2 are acceptable with the specific qualifications noted herein.

Regards,

A handwritten signature in black ink, appearing to read "Alicia Ferber".

Alicia Ferber
Chemistry Data Validator/Analytical Coordinator

Table 1

Sample Collection and Analysis Summary
Additional Groundwater Sampling
Glenn Springs Holdings, Inc. - Durez NT
North Tonawanda, New York
March 2025

Sample Delivery Group	Sample Identification	Location	Matrix	Collection Date (mm/dd/yyyy)	Collection Time (hr:min)	Analysis/Parameters			Comments
						VOCs	Phenolics	TOC	
R2502664	NP-13-0325	NP-13	Groundwater	03/12/2025	14:35	X	X	X	
	NP-16-0325	NP-16	Groundwater	03/13/2025	12:15	X	X	X	MS/MSD
	NTTRIP-031225	-	Water	03/12/2025	-	X			Trip Blank
	P-15-96-0325	P-3-96	Groundwater	03/12/2025	12:45	X	X	X	FD(P-3-96-0325)
	P-19A-0325	P-19A	Groundwater	03/12/2025	16:30	X	X	X	
	P-29-0325	P-29	Groundwater	03/13/2025	14:40	X	X	X	
	P-3-96-0325	P-3-96	Groundwater	03/12/2025	12:45	X	X	X	
R2502694	NP-10-0325	NP-10	Groundwater	03/14/2025	07:40	X	X	X	
	NP-15-0325	NP-15	Groundwater	03/14/2025	08:15	X	X	X	
	NTTRIP-031425	-	Water	03/14/2025	-	X			Trip Blank
	P-11-0325	P-11	Groundwater	03/15/2025	07:40	X	X	X	MS/MSD
	P-13-0325	P-13	Groundwater	03/15/2025	08:00	X			
	P-6A-0325	P-6A	Groundwater	03/14/2025	13:50	X	X	X	MS/MSD
	P-7-0325	P-7	Groundwater	03/15/2025	08:55	X	X	X	
	T-9C-0325	T-9C	Groundwater	03/14/2025	08:45	X	X	X	

Notes:

FD - Field Duplicate Sample of sample in parenthesis
VOCs - Volatile Organic Compounds
TOC - Total Organic Carbon
- - Not Applicable
MS/MSD - Matix Spike/Matix Spike Duplicate

Table 2
Analytical Results Summary
Additional Groundwater Sampling
Glenn Springs Holdings, Inc. - Durez NT
North Tonawanda, New York
March 2025

Location ID:		NP-10	NP-13	NP-15	NP-16	P-3-96	P-3-96	P-6A
Sample Name:		NP-10-0325	NP-13-0325	NP-15-0325	NP-16-0325	P-3-96-0325	P-15-96-0325	P-6A-0325
Sample Date:		03/14/2025	03/12/2025	03/14/2025	03/13/2025	03/12/2025	03/12/2025 Duplicate	03/14/2025
Parameters	Unit							
Volatile Organic Compounds								
1,2,3-Trichlorobenzene	µg/L	1.0 U	1.0 U	5.0 U	1.0 U	1.0 U	1.0 U	250 U
1,2,4-Trichlorobenzene	µg/L	1.0 U	1.0 U	2.7 J	1.0 U	1.0 U	1.0 U	210 J
1,2-Dichlorobenzene	µg/L	1.7	1.0 U	230	1.0 U	1.0 U	1.0 U	15000
1,4-Dichlorobenzene	µg/L	2.7	1.0 U	190	1.0 U	1.0 U	1.0 U	28000
2-Chlorotoluene	µg/L	1.0 U	1.0 U	3.2 J	1.0 U	1.0 U	1.0 U	25000
Benzene	µg/L	0.29 J	1.0 U	210	1.0 U	1.0 U	1.0 U	1600
Chlorobenzene	µg/L	26	1.0 U	620	1.0 U	1.0 U	1.0 U	20000
Toluene	µg/L	1.0 U	1.0 U	5.0 U	1.0 U	1.0 U	1.0 U	250 U
General Chemistry								
Phenolics (total)	mg/L	0.0050 U	0.0050 U	0.0157	0.0050 U	0.0050 U	0.0050 U	0.0391
Total organic carbon (TOC)	mg/L	7.4	3.0	11.9	8.4	2.7	2.8	10.3

Table 2

**Analytical Results Summary
Additional Groundwater Sampling
Glenn Springs Holdings, Inc. - Durez NT
North Tonawanda, New York
March 2025**

	Location ID:	P-7	P-11	P-13	P-19A	P-29	T-9C
	Sample Name:	P-7-0325	P-11-0325	P-13-0325	P-19A-0325	P-29-0325	T-9C-0325
	Sample Date:	03/15/2025	03/15/2025	03/15/2025	03/12/2025	03/13/2025	03/14/2025
Parameters	Unit						
Volatile Organic Compounds							
1,2,3-Trichlorobenzene	µg/L	50 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	µg/L	50 U	0.60 J	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	µg/L	240	6.4	1.0 U	70	1.0 U	1.0 U
1,4-Dichlorobenzene	µg/L	4100	19	0.29 J	27	1.0 U	1.0 U
2-Chlorotoluene	µg/L	5300	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Benzene	µg/L	320	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	µg/L	7500	11	0.34 J	33	1.0 U	1.0 U
Toluene	µg/L	24 J	1.0 U	0.25 J	1.0 U	1.0 U	1.0 U
General Chemistry							
Phenolics (total)	mg/L	0.0235	0.0050 U	--	0.0050 U	0.0050 U	0.0050 U
Total organic carbon (TOC)	mg/L	5.9	3.5	--	4.3	6.6	4.4

Notes:

U - Not detected at the associated reporting limit

J - Estimated concentration

-- - Not Analyzed

Table 3

**Analytical Methods
Additional Groundwater Sampling
Glenn Springs Holdings, Inc. - Durez NT
North Tonawanda, New York
March 2025**

Parameter	Method	Matrix	Holding Time
			Collection or Extraction to Analysis (Days)
VOCs	EPA 624	Groundwater	14
Phenolics	EPA 420.4	Groundwater	28
TOC	SM 5310B	Groundwater	28

Notes:

VOCs - Volatile Organic Compounds
TOC - Total Organic Carbon

Method References:

EPA - "Methods for Chemical Analysis of Water and Waste," EPA-600/4-79-020, revised March 1983, with subsequent revisions.
SM - "Standard Methods for the Examination of Water and Wastewater", 18th Edition, 1992, with subsequent revisions.

Table 4

Qualified Sample Results Due to Analyte Concentrations in the Method Blanks
Additional Groundwater Sampling
Glenn Springs Holdings, Inc. - Durez NT
North Tonawanda, New York
March 2025

Parameter	Analyte	Analysis Date (mm/dd/yyyy)	Blank Result *	Sample ID	Original Result	Qualified Result	Units
Volatile Organic Compounds	1,2,3-Trichlorobenzene	03/21/2025	0.28 J	NP-10-0325	0.29 J	1.0 U	µg/L
	1,2,3-Trichlorobenzene	03/21/2025	0.28 J	P-11-0325	0.42 J	1.0 U	µg/L
	1,2,3-Trichlorobenzene	03/21/2025	0.28 J	P-6A-0325	120 J	250 U	µg/L

Notes:

- * - Blank result adjusted for sample factors where applicable
- U - Not detected at the associated reporting limit
- J - Estimated concentration

Table 5

Qualified Sample Data Due to Analyte Concentrations in the Trip Blanks
Additional Groundwater Sampling
Glenn Springs Holdings, Inc. - Durez NT
North Tonawanda, New York
March 2025

Parameter	Blank Date (mm/dd/yyyy)	Analyte	Blank Result	Associated Sample ID	Original Result	Qualified Result	Units
Volatile Organic Compounds	03/14/2025	Toluene	0.32 J	NP-10-0325	0.30 J	1.0 U	µg/L
	03/14/2025	Toluene	0.32 J	NP-15-0325	1.8 J	5.0 U	µg/L
	03/14/2025	Toluene	0.32 J	P-6A-0325	70 J	250 U	µg/L

Notes:

- U - Not detected at the associated reporting limit
J - Estimated concentration

Appendix G - Attachment C

Historical GW Data

Attachment C
Table C.1

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-22/NP-22A

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Feb-84	Jun-93	Oct-93	Dec-94	Mar-95	Jun-95	Sep-95	Dec-95	Mar-96	Jun-96
Benzene	1	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
Toluene	5	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
Monochlorobenzene	5	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
2-Chlorotoluene	5	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
1,4-Dichlorobenzene	3	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
1,2-Dichlorobenzene	3	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
1,2,4-Trichlorobenzene	5	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
1,2,3-Trichlorobenzene	5	µg/L	U	Dry	Dry	1 U	5 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	1 U/1 U
Total Targeted Organics	NA	µg/L	0	Dry	Dry	0	0	0	0/0	0/0	0/0	0/0
Total Recoverable Phenolics	1	µg/L	1	Dry	Dry	15	13	9	5 U/5 U	5 U/5 U	5 U/5 U	5 U/5 U
TOC	NA	mg/L	4	Dry	Dry	7.4	3.5	4.6 U	6.0/4.6	3.6/3.6	2.7/3.0	2.2/2.0
pH	6.5 - 8.5	S.U.	6.6	Dry	Dry	7.5	6.92	6.63	7.55	7.75	6.69	7.88
Temperature	NA	Celsius	3	Dry	Dry	6.4	5.6	20.6	16.2	5.0	4.4	16.1
Conductivity	NA	mS/cm	1,500	Dry	Dry	758	682	804	944	536	906	568
Turbidity	NA	NTU	NA	Dry	Dry	NA	NA	NA	NA	NA	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	Dry	Dry	NA	NA	NA	NA	NA	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	Dry	Dry	NA	NA	NA	NA	NA	NA	NA
			Sep-96	Dec-96	Mar-97	Jun-97	Sep-97	Dec-97	Mar-98	Jun-98	Sep-98	Dec-98
Benzene	1	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
Toluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
Monochlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
2-Chlorotoluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry	1 U	Dry
Total Targeted Organics	NA	µg/L	0	0	0	0	0	0	0	Dry	0	Dry
Total Recoverable Phenolics	1	µg/L	5 U	5 U	5 U	5 U	5 U	5 U	5 U	Dry	5 U	Dry
TOC	NA	mg/L	14	3.7 J	5.3	1.4	3.2	2.7	1.6	Dry	74.8	Dry
pH	6.5 - 8.5	S.U.	6.61	7.48	7.33	7.46	7.32	7.8	7.1	Dry	7.32	Dry
Temperature	NA	Celsius	15.5	7.9	5.1	14.4	13.8	7.2	5.0	Dry	16.2	Dry
Conductivity	NA	mS/cm	680	890	900	860	1100	950	790	Dry	850	Dry
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	Dry	NA	Dry
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	Dry	NA	Dry
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	Dry	NA	Dry

Attachment C
Table C.1

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-22/NP-22A

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units										
			Mar-99	Jun-99	Sep-99	Dec-99	Apr-00	May-01	Apr-02	May-03	May-04	Jul-05
Benzene	1	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
Toluene	5	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
Monochlorobenzene	5	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
2-Chlorotoluene	5	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1.00 U	1.0 U
Total Targeted Organics	-	µg/L	0	0	Dry	0	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	6 J	13	Dry	9	5 U	5 U	239	7.66	5 U	29
TOC	-	mg/L	2.6 U	2.78	Dry	2.28	2.9	5.1	4.6	3.8	4.9	3.7
pH	6.5 - 8.5	S.U.	4.68	6.24	Dry	6.4	5.82	6.31	7.46	6.58	6.99	7.08
Temperature	-	Celsius	6.2	11.2	Dry	10	5.5	10.4	8	6.8	10.3	11
Conductivity	-	mS/cm	600	800	Dry	8090	765	820	937	561	920	72.5
Turbidity	NA	NTU	NA	NA	Dry	NA	NA	NA	NA	NA	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	Dry	NA	NA	NA	NA	NA	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	Dry	NA	NA	NA	NA	NA	NA	NA
			Aug-06	Jun-07	Aug-08	Apr-09	May-10	May-11	Apr-12	Apr-13	Apr-14	Apr-15
Benzene	1	µg/L	1.0 U	1.0 U	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	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Monochlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
2-Chlorotoluene	5	µg/L	1.0 U	0.32 J	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	3	µg/L	1.0 U	1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 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	µg/L	1.0 U	1.0 U	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 Organics	NA	µg/L	0	0.32	0	0	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	10 U	10 U	10 U	10U	34	12	10 U	0.01	14	10 U
TOC	NA	mg/L	2.9	3.4	2.8	2.02	3.5	2.7	2.8	2.4	2.4	1.6
pH	6.5 - 8.5	S.U.	6.96	6.82	6.78	7.89	8.14	6.95	5.73	7.28	7.28	7.05
Temperature	NA	Celsius	15.4	10.3	16.1	9.33	9.98	9.51	9.87	7.84	7.84	9.8
Conductivity	NA	mS/cm	712	960	1041	10180	1030	902	944	1.242	1.242	0.78
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Attachment C
Table C.1

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-22/NP-22A

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Apr-16	Apr-17	Apr-18	Apr-19	May-20	Apr-21	May-22	Apr-23	Apr-24	Apr-25
Benzene	1	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	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	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
Monochlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U
2-Chlorotoluene	5	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	1.0 U/1.0 U	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 Organics	NA	µg/L	0	0	0/0	0/0	0/0	0/0	0/0	0/0	0/0	0/0
Total Recoverable Phenolics	1	µg/L	5.0 U	5.0 U	5.0 U/5.0 U	5.0 U/5.0 U	5.0 U/5.0 U	5.0 U/5.0 U	5.0 U/5.0 U	5.0 U/5.0 U	5.0 U/5.0 U	5.0 U/5.0 U
TOC	NA	mg/L	10.5	3.3	2.7/2.6	3.0/3.0	3.5/3.9	2.0/2.3	47.3/3.9	1.0/4.1	4.5/4.5	4.3/4.4
pH	6.5 - 8.5	S.U.	6.98	6.28	6.27	6.85	8.31	7.18	7.01	6.76	6.70	7.27
Temperature	NA	Celsius	6.3	7.6	3.9	9.5	12.9	8.1	11.7	7.2	10.77	12.37
Conductivity	NA	mS/cm	0.94	0.97	1.19	1.05	1.71	5.05	4.13	4.19	5.62	3.82
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	3.57	1.49
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	0.89	1.51
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	-8	81

Notes:

- ⁽¹⁾
 - Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgment; except analyses for Total Recoverable Phenolics were reported in Phenols in February 1984
- ⁽²⁾
 - Groundwater standards are New York State Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998
 - Interceptor Trench operation began in October 1990; first full month of operation was November 1990; represented by dashed vertical line above
 - NP-22A was installed in November 1993, approximately 10 feet from the former location of NP-22
- Dry
 - Dry well or insufficient sample for analyses
- J
 - Estimated at associated value
- NA
 - Not analyzed or not available
- S.U.
 - Standard Unit
- TOC
 - Total Organic Carbon
- U
 - Not detected at associated value
- µg/L
 - Micrograms per liter
- mg/L
 - Miligrams per liter
- s.u.
 - Standard Unit
- mS/cm
 - Microsiemens per centimeter
- NTU
 - Nephelometric Turbidity Unit
- mV
 - millivolts
- Concentration exceeds New York State water quality standards

Attachment C
Table C.2

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-23

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Sum-83	Jan-89	Dec-93	Mar-94	Jun-94	Sep-94	Dec-94	Mar-95	Jun-95	Sep-95
Benzene	1	µg/L	9	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
Toluene	5	µg/L	U	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
Monochlorobenzene	5	µg/L	U	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
2-Chlorotoluene	5	µg/L	2	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
1,4-Dichlorobenzene	3	µg/L	U	4	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
1,2-Dichlorobenzene	3	µg/L	U	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
1,2,4-Trichlorobenzene	5	µg/L	3	1	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
1,2,3-Trichlorobenzene	5	µg/L	U	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	Dry
Total Targeted Organics	-	µg/L	14	5	0	0	0	0	0	0	0	Dry
Total Recoverable Phenolics	1	µg/L	1	NA	5 U	5 U	27	10	2	5 U	5 U	Dry
TOC	-	mg/L	1	NA	3	6.7	3.8	8.5	4.5	2.8	1	Dry
pH	6.5 - 8.5	S.U.	7	6.5	8.25	7.68	7.7	7.45	7.75	7	6.71	Dry
Temperature	-	Celsius	20	5.7	7.5	8.8	19.3	12.1	7.8	6	21.3	Dry
Conductivity	-	mS/cm	610	3100	486	1440	740	870	851	356	430	Dry
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	NA	Dry
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	Dry
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	NA	Dry
			Dec-95	Mar-96	Jun-96	Sep-96	Dec-96	Mar-97	Jun-97	Sep-97	Dec-97	Mar-98
Benzene	1	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Toluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Monochlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
2-Chlorotoluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Total Targeted Organics	-	µg/L	0	0	0	0	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U
TOC	-	mg/L	5.2	2.3	2.1	4.6	3.8 J	41	1.1	8.8	3.9	2.0
pH	6.5 - 8.5	S.U.	7.56	6.53	7.57	6.53	7.17	7.82	7.47	7.53	7.11	7.30
Temperature	-	Celsius	5.4	3.9	16.7	16.4	7.9	15.1	16.2	8.8	6.8	
Conductivity	-	mS/cm	480	770	388	480	896	425	400	820	600	1055
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Attachment C
Table C.2

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-23

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Jun-98	Sep-98	Dec-98	Mar-99	Jun-99	Sep-99	Dec-99	Apr-00	May-01	Apr-02
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
TOC	-	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Conductivity	NA	mS/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Turbidity	NA	NTU	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
			May-03	May-04	Jul-05	Aug-06	Jun-07	Aug-08	Apr-09	May-10	May-11	Apr-12
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	0	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	10 U	Dry	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	18.6	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	7.74	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	20.8	Dry	Dry	Dry	Dry
Conductivity	NA	mS/cm	Dry	Dry	Dry	Dry	Dry	443	Dry	Dry	Dry	Dry
Turbidity	NA	NTU	Dry	Dry	Dry	Dry	Dry	NA	Dry	Dry	Dry	Dry
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry	Dry	Dry	Dry	NA	Dry	Dry	Dry	Dry
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry	Dry	Dry	Dry	NA	Dry	Dry	Dry	Dry

Attachment C
Table C.2

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-23

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Apr-13	Apr-14	Apr-15	Apr-16	Apr-17	Apr-18	Apr-19	May-20	Apr-21	May-22
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Conductivity	NA	mS/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Turbidity	NA	NTU	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry

			Apr-23	Apr-24	Apr-25
Benzene	1	µg/L	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry
Conductivity	NA	mS/cm	Dry	Dry	Dry
Turbidity	NA	NTU	Dry	Dry	Dry
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry	Dry
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry	Dry

Notes:

⁽¹⁾ - Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgment; except analyses for Total Recoverable Phenolics were reported in Phenols in February 1984

⁽²⁾ - Groundwater standards are New York State Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998

- Interceptor Trench operation began in October 1990; first full month of operation was November 1990; represented by dashed vertical line above

- NP-22A was installed in November 1993, approximately 10 feet from the former location of NP-22

Dry - Dry well or insufficient sample for analyses

J - Estimated at associated value

NA - Not analyzed or not available

S.U. - Standard Unit

TOC - Total Organic Carbon

U - Not detected at associated value

µg/L - Micrograms per liter

mg/L - Miligrams per liter

s.u. - Standard Unit

mS/cm - Microsiemens per centimeter

NTU - Nephelometric Turbidity Unit

mV - millivolts

- Concentration exceeds New York State water quality standards

Attachment C
Table C.3

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-27

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units										
			Sum-83	Dec-93	Mar-94	Jun-94	Sep-94	Dec-94	Mar-95	Jun-95	Sep-95	Dec-95
Benzene	1	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
Toluene	5	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
Monochlorobenzene	5	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
2-Chlorotoluene	5	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
1,4-Dichlorobenzene	3	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
1,2-Dichlorobenzene	3	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
1,2,4-Trichlorobenzene	5	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
1,2,3-Trichlorobenzene	5	µg/L	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry	1 U
Total Targeted Organics	NA	µg/L	0	0	0	0	Dry	0	0	0	Dry	0
Total Recoverable Phenolics	1	µg/L	14 U	3	5 U	5	Dry	6	5 U	5 U	Dry	5 U
TOC	NA	mg/L	4	2.4	11	2.9	Dry	5	1.6	2.6	Dry	3.4
pH	6.5 - 8.5	S.U.	6.8	7.58	7.48	6.96	Dry	7.43	7.46	6.41	Dry	7.52
Temperature	NA	Celsius	15	7.4	8.6	17.5	Dry	7.6	5.7	20.2	Dry	4.1
Conductivity	NA	mS/cm	1,570	805	1890	840	Dry	716	546	631	Dry	555
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	Dry	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	Dry	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	Dry	NA
			Mar-96	Jun-96	Sep-96	Dec-96	Mar-97	Jun-97	Sep-97	Dec-97	Mar-98	Jun-98
Benzene	1	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
Toluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
Monochlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
2-Chlorotoluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	Dry
Total Targeted Organics	NA	µg/L	0	0	0	0	0	0	0	0	0	Dry
Total Recoverable Phenolics	1	µg/L	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	Dry
TOC	NA	mg/L	1.2	1.1	2.9	4.2 J	3.7	1 U	2.4	3.0	1.3	Dry
pH	6.5 - 8.5	S.U.	6.85	7.37	6.94	7.34	7.42	8.01	7.27	7.13	7.28	Dry
Temperature	NA	Celsius	3.9	16.9	17.8	8.7	4.5	16.1	15.4	6.2	5.9	Dry
Conductivity	NA	mS/cm	780	600	630	990	920	910	1000	850	820	Dry
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	NA	Dry
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	Dry
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	NA	Dry

Attachment C
Table C.3

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-27

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Sep-98	Dec-98	Mar-99	Jun-99	Sep-99	Dec-99	Apr-00	May-01	Apr-02	May-03
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Conductivity	NA	mS/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Turbidity	NA	NTU	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
			May-04	Jul-05	Aug-06	Jun-07	Aug-08	Apr-09	May-10	May-11	Apr-12	Apr-13
Benzene	1	µg/L	Dry	Dry	Dry	Dry	1.0 U	Dry	1.0 U	Dry	1.0 U	1.0 U
Toluene	5	µg/L	Dry	Dry	Dry	Dry	1.0 U	Dry	1.0 U	Dry	1.0 U	1.0 U
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	1.0 U	Dry	1.0 U	Dry	1.0 U	1.0 U
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	6.0 U	Dry	1.0 U	Dry	1.0 U	1.0 U
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	1.0 U	Dry	1.0 U	Dry	1.0 U	1.0 U
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	1.0 U	Dry	1.0 U	Dry	1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	1.0 U	Dry	1.0 U	Dry	1.1	1.0 U
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	1.0 U	Dry	1.0 U	Dry	1.0 U	1.0 U
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	0	Dry	0	Dry	1.1	0
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	12 U	Dry	25U	Dry	10 U	0.01
TOC	NA	mg/L	Dry	Dry	Dry	Dry	19.9	Dry	1.5	Dry	1.9	9.4
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	6.74	Dry	NA	Dry	7.05	7.85
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	19.2	Dry	NA	Dry	11.52	6.9
Conductivity	NA	mS/cm	Dry	Dry	Dry	Dry	930	Dry	NA	Dry	504	0.627
Turbidity	NA	NTU	Dry	Dry	Dry	Dry	NA	Dry	NA	Dry	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry	Dry	Dry	NA	Dry	NA	Dry	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry	Dry	Dry	NA	Dry	NA	Dry	NA	NA

Attachment C
Table C.3

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-27

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Apr-14	Apr-15	Apr-16	Apr-17	Apr-18	Apr-19	May-20	Apr-21	May-22	Apr-23
Benzene	1	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
Toluene	5	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
Monochlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
2-Chlorotoluene	5	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
1,4-Dichlorobenzene	3	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
1,2-Dichlorobenzene	3	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
1,2,4-Trichlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
1,2,3-Trichlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	Dry	1.0 U	1.0 U	Dry
Total Targeted Organics	NA	µg/L	0	0	0	0	0	0	Dry	0	0	Dry
Total Recoverable Phenolics	1	µg/L	3.1 J	10 U	5.0 U	5.0 U	5.0 U	5.0 U	Dry	5.0 U	5.0 U	Dry
TOC	NA	mg/L	1.6	1.0	11.3	2.4	2.5	1.6	Dry	2.0	4.1	Dry
pH	6.5 - 8.5	S.U.	7.85	7.74	7.62	6.62	7.93	6.84	Dry	7.69	8.18	Dry
Temperature	NA	Celsius	6.9	6.9	5.9	6.8	5.3	7.3	Dry	7.6	10.3	Dry
Conductivity	NA	mS/cm	0.627	0.647	0.556	0.69	0.487	0.581	Dry	0.85	0.64	Dry
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	Dry	NA	NA	Dry
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	Dry	NA	NA	Dry
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	Dry	NA	NA	Dry

			Apr-24	Apr-25
Benzene	1	µg/L	Dry	Dry
Toluene	5	µg/L	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry
TOC	NA	mg/L	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry
Temperature	NA	Celsius	Dry	Dry
Conductivity	NA	mS/cm	Dry	Dry
Turbidity	NA	NTU	Dry	Dry
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry

Notes:

(1) - Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgment; except analyses for Total Recoverable Phenolics were reported in Phenols in February 1984

(2) - Groundwater standards are New York State Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998

- Interceptor Trench operation began in October 1990; first full month of operation was November 1990; represented by dashed vertical line above

- NP-22A was installed in November 1993, approximately 10 feet from the former location of NP-22

Dry - Dry well or insufficient sample for analyses

J - Estimated at associated value

NA - Not analyzed or not available

S.U. - Standard Unit

TOC - Total Organic Carbon

U - Not detected at associated value

µg/L - Micrograms per liter

mg/L - Milligrams per liter

s.u. - Standard Unit

mS/cm - Microsiemens per centimeter

NTU - Nephelometric Turbidity Unit

mV - millivolts

- Concentration exceeds New York State water quality standards

Attachment C
Table C.4

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
P32A

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Sum-83	Jan-89	Jun-93	Oct-93	Jun-94	Sep-94	Dec-94	Mar-95	Jun-95	Sep-95
Benzene	1	µg/L	7	1	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U
Toluene	5	µg/L	U	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U
Monochlorobenzene	5	µg/L	310	25	5	10	1 U	1 U	1 U	5 U	1 U	1 U
2-Chlorotoluene	5	µg/L	2	U	2	1 U	1 U	1 U	1 U	5 U	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	120	7	3	12	1 U	1 U	1 U	5 U	1 U	3 U
1,2-Dichlorobenzene	3	µg/L	82	10	3	3	1 U	1 U	1 U	5 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	U	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U
1,2,3-Trichlorobenzene	5	µg/L	U	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U
Total Targeted Organics	NA	µg/L	521	43	13	25	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	14 U	30	1	1	5	19	16	5 U	5 U	5 U
TOC	NA	mg/L	4	28	1	1	3.8	11	9.3	3.4	4.7	3.4
pH	6.5 - 8.5	S.U.	7.1	6.2	1	1	7.04	7.1	7.48	6.82	6.2	7.29
Temperature	NA	Celsius	20	12	1	1	20.2	6.3	10.3	8.2	18.6	20.2
Conductivity	NA	mS/cm	1,940	100000	1	1	8120	759	6150	3830	951	12740
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
			Dec-95	Mar-96	Jun-96	Sep-96	Dec-96	Mar-97	Jun-97	Sep-97	Dec-97	Mar-98
Benzene	1	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Toluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Monochlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
2-Chlorotoluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Total Targeted Organics	NA	µg/L	0	0	0	0	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U
TOC	NA	mg/L	3.4	5.4	3.4	5.7	5.2	6.2	1.9	2.5	3.9	2.3
pH	6.5 - 8.5	S.U.	7.43	6.54	7.38	6.72	6.84	7.11	7.27	7.04	6.79	7.30
Temperature	NA	Celsius	6.9	4.4	16.1	16.9	11.3	6.2	15.1	17.7	10.9	7.2
Conductivity	NA	mS/cm	5,310	4910	2460	2810	8120	3000	6200	4700	6200	5200
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Attachment C
Table C.4

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
P32A

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Jun-98	Sep-98	Dec-98	Mar-99	Jun-99	Sep-99	Dec-99	Apr-00	May-01	Apr-02
Benzene	1	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Toluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Monochlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
2-Chlorotoluene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Total Targeted Organics	NA	µg/L	0	0	0	0	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	5 U	5 U	5 U	5 U	28	5	10	5 U	5 U	185
TOC	NA	mg/L	3.7	76.8	4	3.0 U	3.23	1 U.0	4.39	3	4.2	2.7
pH	6.5 - 8.5	S.U.	7.34	7.18	6.9	6.12	6.8	-	6.86	6.78	6.97	7.65
Temperature	NA	Celsius	16.7	17.1	14.1	5.5	16.9	20	12.8	6.5	13.5	9.3
Conductivity	NA	mS/cm	4,000	4300	4000	3000	3500	3670	3570	3700	2520	3270
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
			May-03	May-04	Jul-05	Aug-06	Jun-07	Aug-08	Apr-09	May-10	May-11	Apr-12
Benzene	1	µg/L	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
Toluene	5	µg/L	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
Monochlorobenzene	5	µg/L	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
2-Chlorotoluene	5	µg/L	1.00 U	1.00 U	1.0 U	1.0 U	0.33 J	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U
1,4-Dichlorobenzene	3	µg/L	1.00 U	1.00 U	1.0 U	1.0 U	0.36 J	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U
1,2-Dichlorobenzene	3	µg/L	1.00 U	1.00 U	1.0 U	1.0 U	0.23 J	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U/1.0 U
1,2,4-Trichlorobenzene	5	µg/L	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
1,2,3-Trichlorobenzene	5	µg/L	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
Total Targeted Organics	NA	µg/L	0	0	0	0	0.92	0	0	0	0	0/0
Total Recoverable Phenolics	1	µg/L	5 U	5 U	10 U	10 U	10 U	10 U	10 U	26 U	79	10 U/10 U
TOC	NA	mg/L	3.6	4.3	3.3	2.2	3.9	3.1	2.31	2.5	2	2.0/1.9
pH	6.5 - 8.5	S.U.	7.35	7.17	7.28	7.42	6.87	6.82	8.12	NA	7.23	6.96
Temperature	NA	Celsius	8.3	12	17.1	21.5	13.1	19.2	11.16	NA	10.44	11.58
Conductivity	NA	mS/cm	3570	4290	3110	2270	3960	4180	3210	NA	5440	3790
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Attachment C
Table C.4

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
P32A

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Apr-13	Apr-14	Apr-15	Apr-16	Apr-17	Apr-18	Apr-19	May-20	Apr-21	May-22
Benzene	1	µg/L	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
Toluene	5	µg/L	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
Monochlorobenzene	5	µg/L	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
2-Chlorotoluene	5	µg/L	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
1,4-Dichlorobenzene	3	µg/L	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
1,2-Dichlorobenzene	3	µg/L	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
1,2,4-Trichlorobenzene	5	µg/L	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
1,2,3-Trichlorobenzene	5	µg/L	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
Total Targeted Organics	NA	µg/L	0	0	0	0	0/0	0	0	0	1.0 U	0
Total Recoverable Phenolics	1	µg/L	0.01	4.1 J	10 U	3.5 J	5 U/5 U	5.0 U	5.0 U	5.0 U	1.0 U	5.0 U
TOC	NA	mg/L	2.3	2.4	1.6	9.4	2.6/2.6	2.6	2.2	2.3	2.2	1.7
pH	6.5 - 8.5	S.U.	7.42	7.28	7.41	7.05	6.76	5.57	6.06	8.61	8.61	7.31
Temperature	NA	Celsius	9.27	7.84	10.2	7.9	8.3	6.5	10.4	16.0	9.9	13.3
Conductivity	NA	mS/cm	3	1	2.9	3.18	3.12	4.88	4.32	4.14	1.0/4.5	4.4
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
			Apr-23	Apr-24	Apr-25							
Benzene	1	µg/L	1.00 U	1.0 U	1.0 U							
Toluene	5	µg/L	1.00 U	1.0 U	1.0 U							
Monochlorobenzene	5	µg/L	1.00 U	1.0 U	1.0 U							
2-Chlorotoluene	5	µg/L	1.00 U	1.0 U	1.0 U							
1,4-Dichlorobenzene	3	µg/L	1.00 U	1.0 U	1.0 U							
1,2-Dichlorobenzene	3	µg/L	1.00 U	1.0 U	1.0 U							
1,2,4-Trichlorobenzene	5	µg/L	1.00 U	1.0 U	1.0 U							
1,2,3-Trichlorobenzene	5	µg/L	1.00 U	1.0 U	1.0 U							
Total Targeted Organics	NA	µg/L	0	0/0	0							
Total Recoverable Phenolics	1	µg/L	5.00 U	5.0 U	5.0 U							
TOC	NA	mg/L	2.6	1.9	2.4							
pH	6.5 - 8.5	S.U.	7.28	7.16	7.75							
Temperature	NA	Celsius	10.8	15.18	14.06							
Conductivity	NA	mS/cm	4	3.260	4.62							
Turbidity	NA	NTU	NA	NA	2.52							
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	4.04							
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	150							

Notes:

- (1)

- Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgment; except analyses for Total Recoverable Phenolics were reported in Phenols in February 1984
- (2)

- Groundwater standards are New York State Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998
- Interceptor Trench operation began in October 1990; first full month of operation was November 1990; represented by dashed vertical line above
- NP-22A was installed in November 1993, approximately 10 feet from the former location of NP-22
- Dry

- Dry well or insufficient sample for analyses
- J

- Estimated at associated value
- NA

- Not analyzed or not available
- S.U.

- Standard Unit
- TOC

- Total Organic Carbon
- U

- Not detected at associated value
- µg/L

- Micrograms per liter
- mg/L

- Milligrams per liter
- s.u.

- Standard Unit
- mS/cm

- Microsiemens per centimeter
- NTU

- Nephelometric Turbidity Unit
- mV

- millivolts
- Concentration exceeds New York State water quality standards

Attachment C
Table C.5

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-35

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units										
			Sum-83	Dec-93	Mar-94	Jun-94	Sep-94	Dec-94	Mar-95	Jun-95	Sep-95	Dec-95
Benzene	1	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
Toluene	5	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
Monochlorobenzene	5	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
2-Chlorotoluene	5	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
1,2-Dichlorobenzene	3	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
1,2,3-Trichlorobenzene	5	µg/L	U	1 U	1 U	1 U	1 U	1 U	5 U	1 U	1 U	1 U
Total Targeted Organics	NA	µg/L	0	0	0	0	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	14 U	11	5 U	80	14	12	10	5 U	5 U	5 U
TOC	NA	mg/L	4	4	11	5.5	7	10	4.4	11	10.6	8.6
pH	6.5 - 8.5	S.U.	6.9	7.27	8.2	7.08	6.45	7.34	7.02	6.94	7.46	7.42
Temperature	NA	Celsius	21	8	8.1	17.9	20	6.1	5.9	18.3	21.05	4.9
Conductivity	NA	umhos/cm	930	876	1590	920	740	825	499	694	905	696
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
			Mar-96	Jun-96	Sep-96	Dec-96	Mar-97	Jun-97	Sep-97	Dec-97	Mar-98	Jun-84
Benzene	1	µg/L	1 U	1 U	1 U/1 U	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
Toluene	5	µg/L	1 U	1 U	1.9/1.6 J	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
Monochlorobenzene	5	µg/L	1 U	1 U	1 U/1 U	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
2-Chlorotoluene	5	µg/L	1 U	1 U	1 U/1 U	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	1 U/1 U	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	1 U/1 U	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
1,2,4-Trichlorobenzene	5	µg/L	1 U	1 U	1 U/1 U	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
1,2,3-Trichlorobenzene	5	µg/L	1 U	1 U	1 U/1 U	1 U	1 U	1 U	1 U/1 U	1 U	1 U/1 U	Dry
Total Targeted Organics	NA	µg/L	0	0	1.9/1.6 J	0	0	0	0/0	0	0/0	Dry
Total Recoverable Phenolics	1	µg/L	5 U	5 U	5 U	5 U	5 U	5 U	5 U/5 U	5 U	5 U/5 U	Dry
TOC	NA	mg/L	2.8	2.4	4.4	4.2 J	6.2	1.6/1.7	4.0/4.2	4.2	2.5/2.4	Dry
pH	6.5 - 8.5	S.U.	6.77	7.86	6.93	7.71	7.47	7.92	7.22	8.66	7.20	Dry
Temperature	NA	Celsius	3.9	20.5	17.3	7.9	4.7	18.0	16.8	5.3	5.9	Dry
Conductivity	NA	umhos/cm	790	596	680	1000	1000	900	1100	1000	890	Dry
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	NA	Dry
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	Dry
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	NA	Dry

Attachment C
Table C.5

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-35

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Sep-98	Dec-98	Mar-99	Jun-99	Sep-99	Dec-99	Apr-00	May-01	Apr-02	May-03
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	1 U	1 U	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1.5	1 U	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1 U	1 U	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1 U	1 U	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	1 U	1 U	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	1 U	1 U	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1 U	1 U	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	1 U	1 U	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	1.5	0	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	69	5 U	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	3.52	3.1	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	6.68	6.3	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	9.8	6.7	Dry	Dry	Dry
Conductivity	NA	umhos/cm	Dry	Dry	Dry	Dry	Dry	6863	564	Dry	Dry	Dry
Turbidity	NA	NTU	Dry	Dry	Dry	Dry	Dry	NA	NA	Dry	Dry	Dry
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry	Dry	Dry	Dry	NA	NA	Dry	Dry	Dry
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry	Dry	Dry	Dry	NA	NA	Dry	Dry	Dry
			May-04	Jul-05	Aug-06	Jun-07	Aug-08	Apr-09	May-10	May-11	Apr-12	Apr-13
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Conductivity	NA	umhos/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Turbidity	NA	NTU	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry

Attachment C
Table C.5

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-35

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Apr-14	Apr-15	Apr-16	Apr-17	Apr-18	Apr-19	May-20	Apr-21	May-22	Apr-23
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Conductivity	NA	umhos/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Turbidity	NA	NTU	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry

			Apr-24	Apr-25
Benzene	1	µg/L	Dry	Dry
Toluene	5	µg/L	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry
TOC	NA	mg/L	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry
Temperature	NA	Celsius	Dry	Dry
Conductivity	NA	umhos/cm	Dry	Dry
Turbidity	NA	NTU	Dry	Dry
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry

Notes:

- (1)

- Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgment; except analyses for Total Recoverable Phenolics were reported in Phenols in February 1984
- (2)

- Groundwater standards are New York State Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998
- Interceptor Trench operation began in October 1990; first full month of operation was November 1990; represented by dashed vertical line above
- NP-22A was installed in November 1993, approximately 10 feet from the former location of NP-22
- Dry

- Dry well or insufficient sample for analyses
- J

- Estimated at associated value
- NA

- Not analyzed or not available
- S.U.

- Standard Unit
- TOC

- Total Organic Carbon
- U

- Not detected at associated value
- µg/L

- Micrograms per liter
- mg/L

- Milligrams per liter
- s.u.

- Standard Unit
- mS/cm

- Microsiemens per centimeter
- NTU

- Nephelometric Turbidity Unit
- mV

- millivolts
- Concentration exceeds New York State water quality standards

Attachment C
Table C.6

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-44

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units										
			May-85	Dec-85	Dec-88	Jun-93	Oct-93	Dec-93	Mar-94	Jun-94	Sep-94	Dec-94
Benzene	1	µg/L	700	70	920	1 U	Dry	Dry	Dry	1 U	Dry	1 U
Toluene	5	µg/L	13	2	6	1 U	Dry	Dry	Dry	1 U	Dry	1 U
Monochlorobenzene	5	µg/L	9500	2500	14000	1 U	Dry	Dry	Dry	1 U	Dry	1 U
2-Chlorotoluene	5	µg/L	U	1	3	1 U	Dry	Dry	Dry	1 U	Dry	1 U
1,4-Dichlorobenzene	3	µg/L	2700	2900	2900	1 U	Dry	Dry	Dry	1 U	Dry	1 U
1,2-Dichlorobenzene	3	µg/L	700	990	1100	1 U	Dry	Dry	Dry	1 U	Dry	1 U
1,2,4-Trichlorobenzene	5	µg/L	31	48	39	1 U	Dry	Dry	Dry	1 U	Dry	1 U
1,2,3-Trichlorobenzene	5	µg/L	15	14	2	1 U	Dry	Dry	Dry	1 U	Dry	1 U
Total Targeted Organics	NA	µg/L	13659	6525	18970	0	Dry	Dry	Dry	0	Dry	0
Total Recoverable Phenolics	1	µg/L	1750	4650	600	NA	Dry	Dry	Dry	24	Dry	5
TOC	NA	mg/L	131	33	19	9.4	Dry	Dry	Dry	8.8	Dry	12
pH	6.5 - 8.5	S.U.	7.7	6.8	6.9	7.01	Dry	Dry	Dry	1	Dry	7.15
Temperature	NA	Celsius	19	10	NA	15	Dry	Dry	Dry	1	Dry	6.5
Conductivity	NA	umhos/cm	140	1430	NA	885	Dry	Dry	Dry	1	Dry	1234
Turbidity	NA	NTU	NA	NA	NA	NA	Dry	Dry	Dry	NA	Dry	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	Dry	Dry	Dry	NA	Dry	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	Dry	Dry	Dry	NA	Dry	NA
			Mar-95	Jun-95	Sep-95	Dec-95	Mar-96	Jun-96	Sep-96	Dec-96	Mar-97	Jun-97
Benzene	1	µg/L	5 U	1 U	Dry	1 U	1 U	0.22 J	1 U	1 U	1 U	1 U
Toluene	5	µg/L	5 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Monochlorobenzene	5	µg/L	5 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1 U	1.9
2-Chlorotoluene	5	µg/L	5 U	1 U	Dry	1 U	1 U	1.4	1 U	1 U	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	5 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2-Dichlorobenzene	3	µg/L	5 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	5 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1 U	1 U
1,2,3-Trichlorobenzene	5	µg/L	5 U	1 U	Dry	1 U	1 U	1 U	1 U	1 U	1 U	1 U
Total Targeted Organics	NA	µg/L	0	0	Dry	0	0	1.6 J	0	0	0	0
Total Recoverable Phenolics	1	µg/L	17	11	Dry	5 U	5 U	5 U	5 U	5 U	5 U	5 U
TOC	NA	mg/L	5.8	7.1	Dry	9.1	2.4	2.2	6.2	3.2	6.1	1.3
pH	6.5 - 8.5	S.U.	6.06	6.3	Dry	7.56	7.14	8.01	6.63	7.38	7.12	7.73
Temperature	NA	Celsius	6.5	20.2	Dry	4.3	3.3	20	16.2	7.2	3.5	19.0
Conductivity	NA	umhos/cm	1234	868	Dry	1080	965	832	1020	1200	1000	980
Turbidity	NA	NTU	NA	NA	Dry	NA	NA	NA	NA	NA	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	Dry	NA	NA	NA	NA	NA	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	Dry	NA	NA	NA	NA	NA	NA	NA

Attachment C
Table C.6

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-44

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Sep-97	Dec-97	Mar-98	Jun-98	Sep-98	Dec-98	Mar-99	Jun-99	Sep-99	Dec-99
Benzene	1	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	1 U/1 U	1 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	0/0	0	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	5 U/5 U	5 U	Dry	Dry	Dry	Dry	Dry	Dry	Dry
TOC	NA	mg/L	Dry	3.4/3.6	1.8	Dry	Dry	Dry	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	7.18	7.10	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	7.0	3.5	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Conductivity	NA	umhos/cm	Dry	1000	1000	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Turbidity	NA	NTU	Dry	NA	NA	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Dissolved Oxygen (DO)	NA	mg/L	Dry	NA	NA	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Oxidation/reduction potential (ORP)	NA	mV	Dry	NA	NA	Dry	Dry	Dry	Dry	Dry	Dry	Dry
			Apr-00	May-01	Apr-02	May-03	May-04	Jul-05	Aug-06	Jun-07	Aug-08	Apr-09
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	0.26 J	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	0.26 J	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	0.14 J	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	0.66	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	NA	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	NA	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	6.52	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	23.1	Dry
Conductivity	NA	umhos/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	443	Dry
Turbidity	NA	NTU	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	NA	Dry
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	NA	Dry
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	NA	Dry

Attachment C
Table C.6

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-44

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	May-10	May-11	Apr-12	Apr-13	Apr-14	Apr-15	Apr-16	Apr-17	Apr-18	Apr-19
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Conductivity	NA	umhos/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Turbidity	NA	NTU	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry	Dry
			May-20	Apr-21	May-22	Apr-23	Apr-24	Apr-25				
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry				
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry				
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry				
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry				
Conductivity	NA	umhos/cm	Dry	Dry	Dry	Dry	Dry	Dry				
Turbidity	NA	NTU	Dry	Dry	Dry	Dry	Dry	Dry				
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry				
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry	Dry	Dry	Dry	Dry				

Notes:

- (1)

- Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgment; except analyses for Total Recoverable Phenolics were reported in Phenols in February 1984
- (2)

- Groundwater standards are New York State Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998
- Interceptor Trench operation began in October 1990; first full month of operation was November 1990; represented by dashed vertical line above
- NP-22A was installed in November 1993, approximately 10 feet from the former location of NP-22
- Dry

- Dry well or insufficient sample for analyses
- J

- Estimated at associated value
- NA

- Not analyzed or not available
- S.U.

- Standard Unit
- TOC

- Total Organic Carbon
- U

- Not detected at associated value
- µg/L

- Micrograms per liter
- mg/L

- Milligrams per liter
- s.u.

- Standard Unit
- mS/cm

- Microsiemens per centimeter
- NTU

- Nephelometric Turbidity Unit
- mV

- millivolts
- Concentration exceeds New York State water quality standards

Attachment C
Table C.7

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-46

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Dec-85	Jan-89	Dec-93	Mar-94	Jun-94	Sep-94	Dec-94	Mar-95	Jun-95	Sep-95
Benzene	1	µg/L	U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
Toluene	5	µg/L	10 U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
Monochlorobenzene	5	µg/L	U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
2-Chlorotoluene	5	µg/L	U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
1,4-Dichlorobenzene	3	µg/L	U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
1,2-Dichlorobenzene	3	µg/L	U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
1,2,4-Trichlorobenzene	5	µg/L	U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
1,2,3-Trichlorobenzene	5	µg/L	U	U	1 U	1 U	1 U	Dry	1 U	5 U	1 U	Dry
Total Targeted Organics	NA	µg/L	0	0	0	0	0	Dry	0	0	0	Dry
Total Recoverable Phenolics	1	µg/L	500 U	NA	6	5 U	5	Dry	5	5 U	5 U	Dry
TOC	NA	mg/L	10 U	NA	2.1	7.8	3.1	Dry	11	3.6	3.1	Dry
pH	6.5 - 8.5	S.U.	6	6.8	7.18	7.32	7.27	Dry	7.13	7	6.58	Dry
Temperature	NA	Celsius	14	NA	8.3	8.1	17.4	Dry	6.9	5	16.9	Dry
Conductivity	NA	mS/cm	1,045	11000	912	2030	990	Dry	927	650	810	Dry
Turbidity	NA	NTU	NA	NA	NA	NA	NA	Dry	NA	NA	NA	Dry
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	Dry	NA	NA	NA	Dry
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	Dry	NA	NA	NA	Dry
			Dec-95	Mar-96	Jun-96	Sep-96	Dec-96	Mar-97	Jun-97	Sep-97	Dec-97	Mar-98
Benzene	1	µg/L	1 U	1 U	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
Toluene	5	µg/L	1 U	1 U	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
Monochlorobenzene	5	µg/L	1 U	1 U	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
2-Chlorotoluene	5	µg/L	1 U	1 U	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
1,4-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
1,2-Dichlorobenzene	3	µg/L	1 U	1 U	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
1,2,4-Trichlorobenzene	5	µg/L	1 U	1.3	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
1,2,3-Trichlorobenzene	5	µg/L	1 U	1.2	1 U	1 U	1 U/1 U	1 U/1 U	1 U/1 U	Dry	1 U	1 U
Total Targeted Organics	NA	µg/L	0	2.5	0	0	0/0	0/0	0/0	Dry	0	0
Total Recoverable Phenolics	1	µg/L	5 U	5 U	5 U	5 U	5 U/5 U	5 U/5 U	5 U/5 U	Dry	5 U	5 U
TOC	NA	mg/L	3.4	1.4	1.7	2.8	3.2 J/3.7 J	5.8 J/3.6 J	1 U	Dry	2.3	1.2
pH	6.5 - 8.5	S.U.	7.71	6.95	7.52	6.28	7.09	7.06	7.00	Dry	7.2	6.85
Temperature	NA	Celsius	5.3	3.9	18.9	14.9	7.2	3.7	12.5	Dry	6.3	4.5
Conductivity	NA	mS/cm	724	870	786	830	1100	1000	1000	Dry	1000	990
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Attachment C
Table C.7

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-46

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Jun-98	Sep-98	Dec-98	Mar-99	Jun-99	Sep-99	Dec-99	Apr-00	May-01	Apr-02
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1 U	Dry	Dry
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1 U	Dry	Dry
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1	Dry	Dry
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1 U	Dry	Dry
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1 U	Dry	Dry
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1 U	Dry	Dry
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1 U	Dry	Dry
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1 U	Dry	Dry
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	1	Dry	Dry
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	5 U	Dry	Dry
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	5.8	Dry	Dry
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	Dry	5.52	Dry	Dry
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	Dry	5.8	Dry	Dry
Conductivity	NA	mS/cm	Dry	Dry	Dry	Dry	Dry	Dry	Dry	806	Dry	Dry
Turbidity	NA	NTU	Dry	Dry	Dry	Dry	Dry	Dry	Dry	NA	Dry	Dry
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	Dry	NA	Dry	Dry
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry	Dry	Dry	Dry	Dry	Dry	NA	Dry	Dry
			May-03	May-04	Jul-05	Aug-06	Jun-07	Aug-08	Apr-09	May-10	May-11	Apr-12
Benzene	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
Toluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
Monochlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
2-Chlorotoluene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
1,4-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
1,2-Dichlorobenzene	3	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
1,2,4-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
1,2,3-Trichlorobenzene	5	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.0 U	1.0 U	1.0 U/1.0 U	1.0 U
Total Targeted Organics	NA	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	0	0	0/0	0
Total Recoverable Phenolics	1	µg/L	Dry	Dry	Dry	Dry	Dry	Dry	10 U	26 U	9.4 J/14	10 U
TOC	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	1.67	1.6	1.9/1.8	2.1
pH	6.5 - 8.5	S.U.	Dry	Dry	Dry	Dry	Dry	Dry	7.73	8.73	6.83	6.69
Temperature	NA	Celsius	Dry	Dry	Dry	Dry	Dry	Dry	11.8	11.49	8.72	10.43
Conductivity	NA	mS/cm	Dry	Dry	Dry	Dry	Dry	Dry	1013	1045	931	960
Turbidity	NA	NTU	Dry	Dry	Dry	Dry	Dry	Dry	NA	NA	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	Dry	Dry	Dry	Dry	Dry	Dry	NA	NA	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	Dry	Dry	Dry	Dry	Dry	Dry	NA	NA	NA	NA

Attachment C
Table C.7

Groundwater Chemistry Monitoring Analytical Results
Durez Interceptor Trench
North Tonawanda, New York
NP-46

Parameter ⁽¹⁾	Groundwater Standard ⁽²⁾	Units	Apr-13	Apr-14	Apr-15	Apr-16	Apr-17	Apr-18	Apr-19	May-20	Apr-24	May-22
Benzene	1	µg/L	1.0 U	1.0 U	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	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Monochlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
2-Chlorotoluene	5	µg/L	1.0 U	1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 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	µg/L	1.0 U	1.0 U	1.0 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	µg/L	1.0 U	1.0 U	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 Organics	NA	µg/L	0	0	0	0	0	0	0	0	0	0
Total Recoverable Phenolics	1	µg/L	0.01	4.4 J	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
TOC	NA	mg/L	2.1	3.2	10.4	10.4	2.3	3.2	3.3	3.1	1.0/4.5	2.3
pH	6.5 - 8.5	S.U.	7.24	7.24	6.75	6.75	6.18	7.02	5.99	7.78	8.69	7.0
Temperature	NA	Celsius	9.1	9.1	6.9	6.9	7.8	5.1	7.7	14.7	9.7	11.7
Conductivity	NA	mS/cm	0.888	0.888	0.87	0.87	0.85	1.00	0.96	1.00	1.06	1.01
Turbidity	NA	NTU	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
			Apr-23	Apr-24	Apr-25							
Benzene	1	µg/L	1.0 U	1.0 U	1.0 U							
Toluene	5	µg/L	1.0 U	1.0 U	1.0 U							
Monochlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U							
2-Chlorotoluene	5	µg/L	1.0 U	1.0 U	1.0 U							
1,4-Dichlorobenzene	3	µg/L	1.0 U	1.0 U	1.0 U							
1,2-Dichlorobenzene	3	µg/L	1.0 U	1.0 U	1.0 U							
1,2,4-Trichlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U							
1,2,3-Trichlorobenzene	5	µg/L	1.0 U	1.0 U	1.0 U							
Total Targeted Organics	NA	µg/L	0	0/0	0							
Total Recoverable Phenolics	1	µg/L	5.00 U	5.0 U	5.0 U							
TOC	NA	mg/L	2.2	2.0	1.8							
pH	6.5 - 8.5	S.U.	6.97	6.76	7.28							
Temperature	NA	Celsius	6.7	13.09	1.58							
Conductivity	NA	mS/cm	0.97	0.890	0.858							
Turbidity	NA	NTU	NA	NA	1.58							
Dissolved Oxygen (DO)	NA	mg/L	NA	NA	7.78							
Oxidation/reduction potential (ORP)	NA	mV	NA	NA	175							

Notes:

- (1)

- Monitoring wells and compounds are in accordance with Appendix B, Durez Partial Consent Judgment; except analyses for Total Recoverable Phenolics were reported in Phenols in February 1984
- (2)

- Groundwater standards are New York State Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations, June 1998
- Interceptor Trench operation began in October 1990; first full month of operation was November 1990; represented by dashed vertical line above
- NP-22A was installed in November 1993, approximately 10 feet from the former location of NP-22
- Dry

- Dry well or insufficient sample for analyses
- J

- Estimated at associated value
- NA

- Not analyzed or not available
- S.U.

- Standard Unit
- TOC

- Total Organic Carbon
- U

- Not detected at associated value
- µg/L

- Micrograms per liter
- mg/L

- Milligrams per liter
- s.u.

- Standard Unit
- mS/cm

- Microsiemens per centimeter
- NTU

- Nephelometric Turbidity Unit
- mV

- millivolts
- Concentration exceeds New York State water quality standards

Appendix H

NYSDEC SPDES Inspection Letter



**Department of
Environmental
Conservation**

KATHY HOCHUL
Governor

AMANDA LEFTON
Commissioner

December 9, 2025

Joseph Branch, Project Manager
Occidental Chemical Corporation/Durez Division
700 Walck Road
North Tonawanda, New York 14210-0535

Dear Joseph Branch:

SPDES Inspection
North Tonawanda (C), Niagara County
SPDES Permit # NY-0001198

On November 6, 2025, I conducted an inspection of the above-mentioned facility. The purpose of this inspection was to assess the facility's compliance with the terms and conditions of its State Pollutant Discharge Elimination System (SPDES) Permit. My inspection found the plant to meet the compliance level of "satisfactory".

A review of the Discharge Monitoring Reports (DMRs) for the plant shows it meets all of the effluent limits of the Permit since the last inspection conducted on October 24, 2024, except for the following: chloroform, December 2024.

To process the change in name of applicant please contact the following:

Lisa Porter Czechowicz
NYSDEC
700 Delaware Avenue
Buffalo, New York 14209
716-851-7165

If you have any questions, you may contact me at (716) 851-7070.

Regards,

William P. Murray, P.E.
Professional Engineer 1 (Environmental)

WM/cj

ec: Damianos Skaros, NYSDEC RWE
Lisa Porter Czechowicz (NYSDEC)
Dennis Hoyt (Geosyntec)

Appendix I

NYSDEC RCRA Inspection Letter



November 28, 2025

SENT VIA EMAIL ONLY

Dennis Hoyt
Principal, Geosyntec Consultants
Occidental Chemical Corporation - Durez
700 Walck Road
North Tonawanda, New York 14120
email: dhoyt@geosyntec.com

Re: Hazardous Waste Compliance Inspection
Inspection Date: 11/14/2025
EPA ID Number: NYD002106938

Dear Dennis Hoyt:

In order to determine compliance with the New York State Hazardous Waste Regulations (6 NYCRR Parts 370-374 and 376), the New York State Department of Environmental Conservation ("NYSDEC") conducted an inspection of your facility on the date indicated above. This letter hereby informs you that no violations were observed during the inspection.

We appreciate your cooperation during the inspection and your efforts to prevent releases of hazardous waste by keeping your facility in compliance with the regulatory requirements. This letter does not address issues pertaining to regulatory fees or hazardous waste special assessment fees. Nothing herein constitutes a waiver by the NYSDEC of any rights it has under state and/or federal law, including any rights regarding violations that may have been present at the facility but not observed, or a release from liability for any party pursuant to said laws.

A copy of the inspection form is attached. If you have any questions, please contact me at kathleen.emery@dec.ny.gov or (716) 851-7220.

Sincerely,

Kathleen Horrigan Emery, P.E.
Regional Hazardous Waste Supervisor
Division of Materials Management/RCRA

Enclosure

D. Hoyt
November 28, 2025
Page 2

ec: Charles Fagerquist, PE, Reviewer, RCRA Compliance Section, NYSDEC – Central Office
Ken Zidell, Inspector, NYSDEC – R9
Joseph Branch, Occidental Chemical Corp.
eDocs:letter.rcra.NYD002106938.2025-11-28.OCC_Durez.no_violations_observed.pdf



Department of
Environmental
Conservation

Region	9
CESQG	___
SQG	___
GENERATOR	X
TSDf	___
OTHER	___
NONREGULATED	___
UNANNOUNCED	X
ANNOUNCED	___

INSPECTION FORM

NEW YORK STATE INDUSTRIAL HAZARDOUS WASTE MANAGEMENT ACT
(Chapter 639, Laws of 1978)

Prepared for: Commissioner
NEW YORK STATE DEPARTMENT OF
ENVIRONMENTAL CONSERVATION

Send to: NYSDEC
Division of Materials Management
Bureau of Hazardous Waste & Radiation Management
RCRA Compliance & Technical Support Section
625 Broadway, 9th Floor
Albany, New York 12233-7256

Tape company business card
here or
attach letterhead as last page.

EPA I.D. NO.: NYD002106938

COMPANY NAME (Corporate): Durez Occidental
(Division): Glen Springs Holdings

COMPANY MAILING ADDRESS: 700 Walck Road

City & State: North Tonawanda, NY **Zip Code:** 14120

COMPANY LOCATION ADDRESS: _____

(If different than mailing) _____

City & State: _____ **Zip Code:** _____

COUNTY: Niagara

COMPANY TELEPHONE NO.: 716.345.1978 **Ext.** _____ **Fax:** _____

NAME OF COMPANY CONTACT: Dennis Hoyt

TITLE OF COMPANY CONTACT: Principal, Geosyntec Consultants

EMAIL ADDRESS OF CONTACT: dhoyt@geosyntec.com

INSPECTION DATE: 20251114 **TIME OF INSPECTION:** 1000

INSPECTOR'S NAME: Ken Zidell

NAME: _____

REPORT PREPARED BY: Ken Zidell **DATE:** 20251128

REPORT APPROVED BY: Kathleen Emery **DATE:** 20251128

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		4. Status Identification	I-5
Part II	☒	<u>Comments, Conclusions and Recommendations</u> (Not for release to company, protected information)	
		<u>Generator, TSDF and Transporter Requirements</u> (Check and attach applicable Parts and Appendices)	
Part III	☐	CESQG – Conditionally Exempt Small Quantity Generator	III-1
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APPENDICIES

Appendix A	☒	Land Disposal Restrictions – SQG & Generator
Appendix B	☐	Land Disposal Restrictions – TSDF
Appendix C	☐	Permitted Facility Inspection
Appendix C2	☐	Permitted Facility Inspection
Appendix D	☐	Consent Order Follow-up Inspection
Appendix E	☐	Requirements for Tanks
Appendix F	☐	Reserved
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Appendix H	☐	Closure/Post Closure Inspection
Appendix I	☐	Incinerators and Energy Recovery Facilities
Appendix J	☐	Thermal Treatment
Appendix K	☐	Chemical, Physical and Biological Treatment
Appendix L-1	☐	Universal Waste – Small Quantity Handlers
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Appendix M	☐	Dental Facilities
Appendix N	☐	Drip Pads
Appendix X-I	☐	Air Emissions Standards for Process Vents – 373-3.27
Appendix X-II	☐	Air Emissions Standards for Equipment Leaks – 373-3.28
Appendix X-III	☐	Tanks, Surface Impounds, and Containers – 373-3.29
Appendix Z	☐	Academic Laboratories

Attachments

Attachment 1	☐
Attachment 2	☐

Company Name Durez Occidental
EPA ID# No. NYD002106938
Region/Inspector 9 / Zidell
Inspection Date 20251114

PART I
GENERAL INFORMATION AND CLASSIFICATION OF FACILITY

I. Identification of Hazardous Waste - 371

Yes No

A. Facility generates hazardous waste.

☒ ☐

1. ☒ The company has made a hazardous waste determination based on:
 - a. ☒ knowledge of the waste;
 - b. ☒ testing of the waste.
2. ☒ The material has the characteristic of:
 - ☒ Ignitability (D001) - 371.3(b)
 - ☐ Corrosivity (D002) - 371.3(c)
 - ☐ Reactivity (D003) - 371.3(d)
 - ☐ Toxicity (D004 - D043) - 371.3(e)
3. ☐ The material is listed in the regulations as a hazardous waste from non-specific sources (F-Waste). 371.4(b).
4. ☐ The waste is listed in the regulations as a hazardous waste from specific sources (K-Waste). 371.4(c).
5. ☐ The material is listed in the regulations as an acute hazardous waste (P-Waste) 371.4(d)(5).
6. ☒ The material or product is listed in the regulations as a discarded commercial chemical product, off-specification species or manufacturing chemical intermediate (U-Waste). 371.4(d)(6).
7. ☐ The material is listed in the regulations as a waste containing PCBs (B-Waste) 371.4(e).

B. If the facility is a treatment, storage or disposal facility, have they:

- ☐ Submitted a Part A. application.
- ☐ Submitted a Part 373 permit application.
- ☐ Been granted a Part 373 permit. *expiration date:

*Complete Appendix C - indicate compliance status with permit conditions.

- C. ☐ Has the facility signed a consent order to resolve violations found during a previous inspection? **

**Complete Appendix D indicating compliance with conditions of the Order.

II. Exemptions

A. Generator Exemptions

1. ☐ Not a regulated handler.
2. ☐ Samples collected for testing - 372.1(e)(5).
3. ☐ Residues of hazardous waste in empty containers - 372.1(e)(6).
4. ☐ A hazardous waste which is generated in a product or raw material storage tank, transport vehicle or vessel, pipeline, or in a manufacturing process unit or an associated non-waste treatment manufacturing process unit is not subject to regulation until it exits the unit in which it was generated, unless the unit is a surface impoundment, or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated, manufacturing, or for storage or transportation - 371.1(e)(3).

B. TSD Exemptions

1. ☒ Storage of hazardous waste that is generated on-site in containers or tanks for a period not exceeding 90 days - 373-1.1(d)(1)(iii).
2. ☐ Storage of liquid hazardous waste in containers (>185 gallons) or tanks generated on-site over the designated sole source aquifers for a period not exceeding 90 days - 373-1.1(d)(1)(iv).
3. ☐ The on-site storage and treatment of hazardous waste by generators that generate less than 100 kilograms of hazardous waste in any calendar month and store less than 1,000 kilograms - 373-1.1(d)(1)(v).
4. ☐ The storage and recycling of the recyclable materials identified in subparagraphs 371.1(g)(1)(iii) and (iv) of this title - 373-1.1(d)(1)(vi).
5. ☐ The storage of the recyclable materials is exempt from permitting provided that Subpart 374-1 is complied with. (NOTE: Subpart 374-1 requires that the facility also complies with selected sections of this Part). 373-1.1(d)(1)(vii):
 - a. ☐ recyclable materials used in a manner constituting disposal (see section 374-1.3);
 - b. ☐ hazardous wastes burned (as defined in subdivision 374-1.8(a) of this Title) in boilers and industrial furnaces that are not regulated under section 373-2.15 or 373-3.15 of this Title (see section 374-1.8);
 - c. ☐ recyclable materials from which precious metals are reclaimed (see section 374-1.6) (complete Appendix G);
 - d. ☐ spent lead-acid batteries that are being reclaimed (see section 374-1.7).
6. ☐ The recycling of hazardous wastes is exempt from permitting provided 373-2.2(c) (identification number), 373-2.5(b) or 373-3.5(b) (manifest requirement), and clause 373-1.1(d)(1)(viii)(d) are complied with. (Storage prior to recycling is not exempt under this subparagraph.) In addition:

373-1.1(d)(1)(viii)

- a. ☐ This exemption is available to:
 - (i) ☐ Commercial facilities that reclaim precious metals, as defined in 374-1.6 of this Title;
 - (ii) ☐ Mobile or transportable commercial facilities which operate on the generator's site, if a containment area, meeting the requirements of 373-2.9(f), is provided for the reclaiming facility and any associated, temporary container holding or storage area.
 - b. ☐ This exemption is not available to any units, other than boilers and industrial furnaces, that burn hazardous wastes for energy recovery.
 - c. ☐ Exempted processes that recycle the hazardous wastes listed in 2B(5)(a-d) must comply with Part 374 of this title in lieu of the requirements specified in this subparagraph (NOTE: Part 374 will require that the facility also complies with selected sections of this Part).
 - d. ☐ Owners or operators of facilities subject to RCRA permitting requirements with hazardous waste management units that recycle hazardous waste are subject to the requirements of sections 373-2.27, 373-2.28, 373-3.27 and 373-3.28 of this Part.
7. ☐ The on-site treatment of hazardous waste, by the generator, in the same tanks or containers used for accumulation and storage is exempt provided the generator complies with Part 373-1.1(d)(1)(iii) and (iv) and Part 372.2(c)(4). Any treatment or placement of hazardous waste in a manner that constitutes land disposal, as defined in subdivision 370.2(b), does not qualify for this exemption - 373-1.1(d)(1)(ix).
8. ☐ Totally enclosed treatment facility - 373-1.1(d)(1)(xi).
9. ☒ Elementary neutralization units or wastewater treatment units, as defined in Part 370 of this Title - 373-1.1(d)(1)(xii).
10. ☒ Accumulation areas - 373-1.1(d)(1)(xiv) (not applicable to CESQG).
11. ☐ A transporter storing manifested shipments of hazardous waste in containers at a transfer facility for a period of ten calendar days or less - Complete Part VII- 373-1.1(d)(1)(xv).

III. Hazardous Waste Generation/Treatment/Storage/Disposal

- A. Describe only the activities that result in the generation of hazardous waste. Include manufacturing processes that generate hazardous waste. (Do not include hazardous waste treatment processes.)
- Remediation site. Contaminated GW containing chloroform / chlorobenzene treated in on-site WWT system-D001, U015, U027, U070. Filter material - sand/activated carbon disposed off-site - U019, U027, U070, U071.
- B. Describe any on-site hazardous waste treatment processes that result in the generation of hazardous waste (exempt and/or non-exempt). Include process diagrams if available.
- 500,000-gal (2 units) collection tanks receive on-site GW. Passed through 18,000-gallon decanter tank to remove DNAPL. Passed through 3x sand filter units and 2x carbon beds, 3x polishing carbon beds, then through 56x0.5-micron filter bags. Water is discharge under SPDES permit.
- C. Identify the hazardous wastes that are on-site, the quantity of each, the storage method, the type and size of containers or tanks used and their location in the storage area. (Be as specific as possible.)
1. Accumulation Areas (NOTE: Waste in accumulation areas must be included as part of the total quantity of waste stored on-site) (not applicable to CESQG):
1x30-gal drum of NAPL
1x55-gal PPE
 2. Container Storage Areas for CESQG, SQG or Generator (list Universal Waste in section IV. D.):
1 x 55 gallon drum filter bags - 10/21/2025
 3. Tank Storage Areas for CESQG, SQG or Generator:
2x500,000-gal collection tanks. 1x18,000-gal decanter tank.
-

4. Interim Status/Permitted Container Storage Areas:
5. Interim Status/Permitted Tank Storage Areas:
6. Treatment, storage or disposal units such as surface impoundments, landfills, waste piles or incinerators:

IV. Status Identification:

A. **Generator Status**

1. ☐ Conditionally Exempt Small Quantity Generator (CESQG) - generates less than 100 kg/mo of non-acute hazardous waste or 1 kg/mo of acute hazardous waste. Complete Part III - 371.1(f)(6), 371.1(f)(7).
2. ☐ Small Quantity Generator (SGQ) - generates more than 100 kg/mo but less than 1,000 kg/mo of non-acute hazardous waste on-site. Complete Part IV - 372.2(a)(8)(iii).

RCRAInfo Site Manager/Certifier: _____

3. ☒ Generator - generates more than 1,000 kg/mo of non-acute hazardous waste or generates more than 1 kg of acute hazardous waste in a calendar month. Complete Part V - 372.2(a)(8)(ii).

RCRAInfo Site Manager/Certifier: **Joe Branch**

B. **Treatment, Storage or Disposal Facility (TSDF)**

1. ☐ Hazardous waste is stored greater than 90 days. *, **
2. ☐ Hazardous waste is received from off-site and not beneficially used, reused or legitimately recycled or stored. *
3. ☐ Hazardous waste is treated on-site in non-exempt units. *
4. ☐ Hazardous waste is disposed of on-site. *

* (If checked complete appropriate Appendices).

** (Do not complete for generators that have exceeded only the 90-day storage limit).

C. **Transporter Status**

Yes ☐ No ☒ Transporter operates a 10-day transfer facility.

If yes, complete Part VII Permit No.

D. **Universal Waste Handler**

1. ☐ Small Quantity Handler - company accumulates no more than 5,000 kg total of universal waste at any time - Complete Appendix L-1.
2. ☐ Large Quantity Handler - company accumulates 5,000 kg or more of universal waste at any time - Complete Appendix L-2.
3. ☐ Universal Waste Managed On-Site (list type and quantity).

E. **RCRA Air Emission Rule (Subpart AA/BB/CC) (TSD and LQG only)**

Is the facility subject to RCRA Air Emission Rules (Subpart AA/BB/CC)?

☐

If Yes, Complete appropriate sections of Appendix-X-I, X-II and X-III.

☒

If No, please explain: _____

Exempt due to CERCLA status

F. **(c)(7) Notification- 371.1(c)(7)**

A (c)(7) notification claims that a material intended to be reclaimed, recycled or reused is not a solid or hazardous waste, or that the material is exempt or conditionally exempt from regulation. The notification gives the names and locations of the generating and receiving facilities, identifies all exemptions or exclusions that the party is claiming, and describes the activity or activities which are believed to qualify for such exemptions or exclusions - 371.1(c)(7)(i).

1. ☐ The facility has filed a (c)(7) notification with the Department, maintains documentation on-site of the basis for this exemption, and has demonstrated the following - 371.1(c)(7)(ii):
 - a. ☐ That there is a known market or disposition for the material - 371.1(c)(7)(ii)(‘a’);
 - b. ☐ That the owner or operator of the receiving facility has the necessary equipment and capacity to process the entire volume of material offered -

371.1(c)(7)(ii)('b'); and

- c. ☐ Through appropriate documentation, such as contracts, that the receiving party will reclaim, recycle, use, or reuse the material in such a manner as to qualify it for the exemption or exclusion - 371.1(c)(7)(ii)('c').
- 2. ☒ The requirement to submit notification to the department does not apply to this facility for the following material(s) - 371.1(c)(7)(i):
 - a. ☐ Dental amalgam - 371.1(c)(7)(i)('a')
 - b. ☐ Precious metals - 371.1(c)(7)(i)('b')
 - c. ☒ Used lead acid batteries - 371.1(c)(7)(i)('c')
 - d. ☒ Used electronics directed for dismantling and recycling - 371.1(c)(7)(i)('d')

G. Used Oil Status

- 1. ☐ This facility handles used oil.
 - a. ☐ Used Oil Generator or Aggregation Point – company produces used oil or first causes used oil to become subject to regulation. Complete Part XII.
 - b. ☐ Used Oil Aggregation Point – company accepts, aggregates, and/or stores used oil collected only from other used oil generation sites owned or operated by the owner or operator of the aggregation point, from which used oil is transported to the aggregation point in shipments of no more than 55 gallons. Complete Part XII.
 - c. ☐ Used Oil Marketer – company either directs a shipment of off-specification used oil from their facility to a used oil burner or claims that used oil that is to be burned for energy recovery meets the used oil fuel specifications. Complete Part XIII.
 - d. ☐ Used Oil Transporter – company transports used oil, collects used oil from more than one generator and transports the collected oil, and owns and operates a used oil transfer facility. Complete Part XIV.
 - e. ☐ Used Oil Transfer Facility – shipments of used oil are held for more than 24 hours and not longer than 35 days during the normal course of transportation. Complete Part XIV.
 - f. ☐ Used Oil Processor/Re-refiner – company processes or re-refines used oil. Complete Part XV.
 - g. ☐ Used Oil Burner – used oil not meeting the specification requirements in section 374-2.2(b)(1) is burned for energy recovery. Complete Part XVI.

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

Company Name Durez Occidental
EPA ID# No. NYD002106938
Region/Inspector 9 / Zidell
Inspection Date 20251114

PART V
LARGE QUANTITY GENERATOR

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

The generator who generates 1,000 kilograms or more per month of non-acute hazardous waste or generates greater than 1kg per month of acute hazardous waste has compiled with the following:

1. General Requirements

- (a) ☐ The generator has made a determination as to whether or not his solid waste is hazardous waste - 372.2(a)(2). ☒
- (b) ☐ The generator has obtained an EPA identification number - 372.2(a)(3). ☒

2. Accumulation Area Requirements - 372.2(a)(8)(i)

- (a) ☐ The containers appear to be in good condition and are not in danger of leaking - 373-3.9(b). ☒
- (b) ☐ Hazardous waste is stored in containers made of compatible materials - 373-3.9(c). ☒
- (c) ☐ All containers except those in use are closed - 373-3.9(d)(1). ☒
- (d) ☐ Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the containers or cause them to leak - 373-3.9(d)(2). ☒
- (e) ☐ Containers are marked with the words "Hazardous Waste" and with other words that identify the contents of the containers - 372.2(a)(8)(i)(a)(2). ☒
- (f) ☐ Hazardous waste may be accumulated in excess of 55 gallons or 1 quart of acutely hazardous waste at or near the point of generation provided that Section 372.2(a)(8)(ii) requirements are met within 3 days, and the container holding the excess accumulation is marked with the date the excess amount began accumulating - 372.2(a)(8)(i)(b). ☒

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

3. 90 Day Storage - 372.2(a)(8)(ii)

- (a) ☐ All wastes **in containers and tanks** are shipped off- site to an authorized treatment, storage or disposal facility (TSDF) in 90 days or less - 372.2(a)(8)(ii). ☒
- (b) ☐ The date upon which each period of accumulation begins is clearly marked and visible for inspection on each **container and tank** - 372.2(a)(8)(ii), 373-1.1(d)(1)(iv)(a), 373-1.1(d)(1)(iii)(c)(2). ☒
- (c) ☐ The containers appear to be in good condition and are not in danger of leaking. (If containers are leaking, describe the type, condition, contents and number that are leaking or corroded. Be detailed and specific) - 373-3.9(b). ☒
- (d) ☐ Hazardous waste is stored in containers made of compatible materials - 373-3.9(c). (If not, please explain.) ☒
- (e) ☐ All containers except those in use are closed - 373-3.9(d)(1). ☒
- (f) ☐ Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the containers or cause them to leak - 373-3.9(d)(2). ☒
- (g) ☐ Each container is marked with the words "Hazardous Waste" and with other words to identify the contents - 373-3.9(d)(3). ☒
- (h) ☐ The container storage area is inspected at least weekly - 373-3.9(e). ☒
- (i) The generator complies with the following special requirements for storage of ignitable or reactive wastes:
- (1) ☐ Containers holding ignitable or reactive waste are located at least 15 meters (50 feet) from the facility property line - 373-3.9(f). ☒
- (2) ☐ Generator has taken precautions to prevent accidental ignition or reaction or ignitable or reactive waste by separating and protecting such waste from sources of ignition or reaction - 373-3.2(h)(1). ☒

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

- (3) ☐ Generator has placed "No Smoking" signs conspicuously wherever there is a hazard from ignitable or reactive waste - 373-3.2(h)(1). ☒
- (j) The generator complies with the following special requirements related to incompatible wastes - 373-3.9(g):
- (1) Incompatible wastes, or incompatible wastes and materials, are not placed in the same container, or in an unwashed container that previously held an incompatible waste or material unless the placement is conducted to prevent the following - 373-3.9(g)(1) & (2):
- (a) ☐ the generation of extreme heat or pressure, fire or explosion, or violent reaction - 373-3.2(h)(2)(i); ☐
- (b) ☐ production of uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(ii); ☐
- (c) ☐ production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(iii); ☐
- (d) ☐ damage to the structural integrity of the device or facility containing the waste - 373-3.2(h)(2)(iv); ☐
- (e) ☐ a threat to human health or the environment - 373-3.2(h)(2)(v). ☐
- (2) ☐ Containers holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device - 373-3.9(g)(3). ☐
- (k) ☐ The owner or operator shall manage all hazardous waste placed in containers in accordance with the applicable requirements of sections 373-3.27, 373-3.28, and 373-3.29 of this Subpart - 373-3.9(h). ☒
- (l) Special requirements for generators that store greater than 185 gallons of liquid hazardous waste over sole source aquifers - 373-1.1(d)(1)(iv):
- (1) ☐ The container storage areas are within a secondary containment system designed and operated in accordance with the following* - 373-1.1(d)(1)(iv)(f): ☐
- (a) ☐ The base under the containers must be free of cracks or gaps and sufficiently impervious to contain collected ☐

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

material until it is removed - 373-2.9(f)(1)(i).

- (b) ☐ The base must be sloped or the containment system otherwise designed and operated to drain and remove liquid unless the containers are elevated or protected from contact with the accumulated liquids - 373-2.9(f)(1)(ii). ☐
- (c) ☐ The containment system must have sufficient capacity to contain 10 percent of the volume of containers or the volume of the largest container, whichever is greater. Containers that do not contain free liquids are not considered in this determination - 373-2.9(f)(1)(iii). ☐
- (d) ☐ Run-on is prevented unless the system has sufficient excess capacity over that required in (3) - 373-2.9(f)(1)(iv). ☐
- (e) ☐ Accumulated waste and precipitation must be removed as necessary to prevent overflow - 373-2.9(f)(1)(v). ☐

*This requirement does not apply to generators of liquid hazardous waste over a sole source aquifer if the container storage volume does not exceed 185 gallons.

- (2) ☐ The generator of liquid hazardous waste over a sole source aquifer has a written closure plan - 373-3.7(c)(1). ☐
- (3) ☐ The closure plan identifies the steps necessary to perform partial and/or final closure of the facility at any point during its active life. The closure plan must contain the information required by 373-3.7(c)(2)(i) - (vii)** - 373-3.7(c)(2). ☐

** If a violation is checked, please attach a sheet listing the deficiencies in the closure plan.

4. Tank Storage Requirements - 373-3.10

1. ☐ Generators must complete Appendix E, except for 373-3.10(h)(3) Items 9C1 through 5. In addition, 373-3.7 and 3.8 which are cross-referenced do not apply except for 373-3.7(b) and (e).
2. ☐ Generators over sole-source aquifers complete Appendix E, except for 373-3.10(h)(3), Items 9C1 through 5 and 373-3.8 (financial requirements).

5. Manifest, Reporting and Record Keeping Requirements

- (a) ☐ Hazardous waste is shipped off-site with an accompanying manifest (prepared on EPA Form 8700-22 and if required Continuation ☒)

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

Form 8700-22A) - 372.2(b)(5)(i).

If violation is checked, please provide details.

- (b) List the frequency of shipments and the amount of waste per shipment.
As needed

- (c) ☐ The transporter has a valid Part 364 permit or is otherwise authorized to transport the waste to the designated facility - 372.2(b)(5)(ii). ☒
- (d) ☐ The generator offers for shipment or ships hazardous waste to an authorized facility - 372.2(b)(5)(iii). ☒

If violation is checked, please provide details.

- (e) ☐ Each Manifest is completed in accordance with the instructions found Appendix 30 of Part 372 - 372.2(b)(1). ☒

Note: Please check items under Generator, Trans1, Trans 2 and TSDF if in violation. If any of these items is checked then that row will be checked Violation. If none of these items is checked then that row will be checked Satisfactory.

- | | Generator | Trans 1 | Trans 2 | TSDF | |
|---|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| (1) ☐ Name of | ☐ | ☐ | ☐ | ☐ | ☒ |
| (2) ☐ EPA ID No. of | ☐ | ☐ | ☐ | ☐ | ☒ |
| (3) ☐ Mailing Address of | ☐ | | | ☐ | ☒ |
| (4) ☐ Telephone No. of | ☐ | | | ☐ | ☒ |
| (5) ☐ Manifest Tracking #[box 5] | | | | | ☒ |
| (6) ☐ Emergency Response Phone [box 3]. | | | | | ☒ |
| (7) ☐ The proper USDOT Description [box 9b]. | | | | | ☒ |
| (8) The appropriate: | | | | | |
| (a) ☐ container number and type [box 10]. | | | | | ☒ |

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

- (b) ☐ quantity [box 11]. ☒
- (c) ☐ waste type by units of weight or volume [box 12]. ☒
- (d) ☐ waste codes [box 13] ☒
- (9) ☐ Signed certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the USDOT and NYSDEC. ☒
- (10) ☐ The generator has used the appropriate manifest. ☒
- (f) ☐ For each hazardous waste listed in box 9 of the manifest, confirm with the designated facility what the ultimate disposal method will be for that waste. If the receiving TSD facility is not providing the ultimate disposal of the hazardous waste, the generator must provide a waste code in box 13 of the manifest to designate the ultimate disposal method of the waste using one of following state codes - 372.2(b)(2)(ii):
- L = Landfill
B = Incineration, heat recovery, burning
T - Chemical, physical, or biological treatment
R - Material recovery of more than 75 percent of the total material.
- (g) ☐ The generator has received signed copies (from TSD Facility) of all manifests for wastes shipped off-site more than 45 days ago: ☒
- ☐ If not, exception reports including an explanation of efforts have been submitted within 60 days covering these shipments - 372.2(c)(3) ☐
- (h) The generator must - 372.2(b)(3):
- (1) ☐ sign the manifest certification by hand - 372.2(b)(3)(i); and ☒
- (2) ☐ obtain the handwritten signature of the initial transporter and date of acceptance on the manifest - 372.2(b)(3)(ii); and ☒
- (3) ☐ distribute copies of the manifest to the generator State making legible photocopies as necessary, postmarked within ten (10) calendar days of shipment date. The generator must give the transporter the remaining copies of the manifest - 372.2(b)(3)(iii). ☒
- (i) For international shipments the generator has done the following - 372.2(b)(4)(i):
- (1) ☐ The EPA and the Department have been notified 60 days prior to shipment of the hazardous waste destined for treatment, ☐

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

storage or disposal outside the United States - 372.5(c)(1).

- | | | | |
|-----|--------------------------|---|-------------------------------------|
| (2) | ☐ | Primary exporters of hazardous waste must file with the Administrator and the Department no later than March 1 of each year, a report summarizing the types, quantities, frequency, and ultimate destination of all hazardous waste exported during the previous calendar year - 372.5(f)(1). | ☐ |
| (j) | ☐ | The generator has complied with the requirements for shipping by rail or water (bulk) found in section 372.7 - 372.2(b)(4)(iii). | ☐ |
| (k) | ☐ | A copy of each manifest has been kept for at least three years from the date the waste was accepted by the initial transporter - 372.2(c)(1)(i). | ☒ |
| (l) | ☐ | A copy of each Annual Report and Exception Report must be kept for a period of at least three years from the due date of the report - 372.2(c)(1)(ii). | ☒ |
| (m) | ☐ | A generator must keep records of any test results, waste analyses, or other determinations made in accordance with Part 372.2(a)(2) for at least three years - 372.2(c)(1)(iii). | ☒ |
| (n) | ☐ | All records required under subdivision 372.2(c) were furnished upon request, or made available at a reasonable time for inspection - 372.2(c)(1)(iv). | ☒ |
| (o) | ☐ | There is confirmation by written communication from the designated treatment, storage or disposal facility and alternate treatment, storage or disposal facility that it is authorized to handle the particular hazardous waste described on the manifest- 372.2(b)(2)(i). | ☒ |
| (p) | ☐ | There is written communication that the designated transporter is authorized to deliver the waste to the facility on the manifest - 372.2(b)(2)(iii). | ☒ |
| (q) | ☐ | A generator who ships hazardous waste <u>off-site</u> to a treatment, storage, or disposal facility located within the United States must submit an Annual Report on forms specified by the Commissioner - 372.2(c)(2). | ☒ |
| (r) | ☐ | The generator must maintain the operating records. These records must be furnished to the department upon request, postmarked within five business days of receipt of a written request. A generator must make such records available at all reasonable times for inspection by any officer, employee, or representative of the department who is duly designated by the commissioner - 373-1.1(d)(1)(iii)(b'). | ☒ |

6. Personnel Training - 373-3.2(g)

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

(a) The following documents and records are maintained at the facility - 373-3.2(g)(4):

- | | | |
|-----|--|-------------------------------------|
| (1) | ☐ the job title for each position at the facility related to hazardous waste management and name of the employee filling each job - 373-3.2(g)(4)(i); | ☒ |
| (2) | ☐ a written job description for each position - 373-3.2(g)(4)(ii); | ☒ |
| (3) | ☐ a written description of the type and amount of both introductory and continuing training that will be given to each person related to hazardous waste management - 373-3.2(g)(4)(iii); and | ☒ |
| (4) | ☐ records that document that the training or job experience required has been given to and completed by facility personnel - 373-3.2(g)(4)(iv). | ☒ |
| (b) | ☐ The training program is directed by a person trained in hazardous waste management procedures and must include instruction which teaches facility personnel hazardous waste management procedures (<u>including contingency plan implementation</u>) relevant to the positions in which they are employed. The components are - 373-3.2(g)(1)(i), (ii) & (iii): | ☒ |
| (1) | ☐ procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment; | ☒ |
| (2) | ☐ key parameters for automated waste feed cutoff systems; | ☒ |
| (3) | ☐ communications or alarm systems; | ☒ |
| (4) | ☐ response to fires and explosions; | ☒ |
| (5) | ☐ response to groundwater contamination incidents; and | ☒ |
| (6) | ☐ shutdown of operations. | ☒ |
| (c) | ☐ For facility employees that receive emergency response training pursuant to Occupational Safety and Health Administration (OSHA) regulations 29 CFR 1910.120(p)(8) and 1910.120(q), the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of this section - 373-3.2(g)(1)(iv). | ☒ |
| (d) | ☐ Facility personnel have successfully completed the program by the effective date of these regulations or six months after the date of their employment - 373-3.2(g)(2). | ☒ |
| (e) | ☐ Facility personnel have taken part in an annual review of the initial training required - 373-3.2(g)(3). | ☒ |

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

- (f) ☐ Training records on current personnel have been kept permanently at the facility (until closure) - 373-3.2(g)(5). ☒
- (g) ☐ Training records on former employees have been kept for at least three years from the date the employee last worked at the facility - 373-3.2(g)(5). ☒

7. Preparedness and Prevention - 373-3.3

- (a) ☐ The facility is maintained and operated to minimize the possibility of a fire or explosion, or any unplanned or sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water - 373-3.3(b). ☒
- (b) ☐ The facility must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below - 373-3.3(c): ☒
- (1) ☐ an internal communication or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel - 373-3.3(c)(1); ☒
- (2) ☐ a device, such as a telephone (immediately available at the scene of operations) or a hand-held, two-way radio capable of summoning emergency assistance from local police departments, fire departments, or emergency response teams - 373-3.3(c)(2); ☒
- (3) ☐ portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment - 373-3.3(c)(3); and ☒
- (4) ☐ water at adequate volume and pressure to supply water hose streams, or foam-producing equipment, or automated sprinklers, or water spray systems - 373-3.3(c)(4). ☒
- (c) ☐ Facility communications or alarm systems, fire protection equipment, and spill control equipment are tested and maintained as necessary to assure their proper operation in time of emergency - 373-3.3(d). ☒
- (d) ☐ Personnel involved in hazardous waste operations have immediate access to an internal alarm or an emergency communication device either directly or through visual or voice contact with another employee - 373-3.3(e). ☒
- (e) ☐ The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency unless aisle space is not needed for ☒

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

any of these purposes - 373-3.3(f).

- (f) The facility owner or operator has attempted to make the following arrangements as appropriate with local authorities for the type of waste handled at the facility and the potential need for the services of these organizations - 373-3.3(g)(1):

- | | | | |
|-----|--------------------------|--|-------------------------------------|
| (1) | ☐ | arrangements to familiarize police, fire departments and emergency response teams with the functions and layout of the facility - 373-3.3(g)(1)(i); | ☒ |
| (2) | ☐ | where more than one police and fire department might respond to an emergency, an agreement designating primary emergency authority to a specific police department and a specific fire department, and agreements with any others to provide support to primary emergency authority - 373-3.3(g)(1)(ii); | ☒ |
| (3) | ☐ | agreements with State emergency response teams, emergency response contractors, and equipment suppliers - 373-3.3(g)(1)(iii); and | ☒ |
| (4) | ☐ | arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility - 373-3.3(g)(1)(iv). | ☒ |
| (g) | ☐ | Where state and local authorities decline to enter into such arrangements, the owner or operator has documented the refusal in the operating record - 373-3.3(g)(2). | ☐ |

8. Contingency Plan - 373-3.4

- | | | | |
|-----|--------------------------|--|-------------------------------------|
| (a) | ☐ | The facility has a contingency plan or some other emergency plan which incorporates hazardous waste management - 373-3.4(b)(1). | ☒ |
| (b) | ☐ | If the owner or operator has already prepared a Spill Prevention, Control, and Countermeasures (SPCC) plan, or some other emergency or contingency plan, that plan need only be amended to incorporate hazardous waste management provisions. The owner or operator may develop one contingency plan which meets all regulatory requirements. When modifications are made to the provisions in an integrated contingency plan, the changes do not trigger the need for a Part 373 permit modification - 373-3.4(c)(2). | ☒ |
| (c) | | The following are included in the contingency plan - 373-3.4(c): | |

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

- | | | |
|------------------------------|---|-------------------------------------|
| (1) ☐ | A description of the actions facility personnel must take in response to fires, explosions or any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water - 373-3.4(c)(1). | ☒ |
| (2) ☐ | A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services - 373-3.4(c)(3). | ☒ |
| (3) ☐ | Names, addresses and office and home phone numbers of all persons qualified to act as emergency coordinator - 373-3.4(c)(4). | ☒ |
| (4) ☐ | An up-to-date list of all emergency equipment at the facility, and decontamination equipment, where this equipment is required - 373-3.4(c)(5). | ☒ |
| (5) ☐ | The location and physical description of each item on the list, and a brief outline of its capabilities - 373-3.4(c)(5). | ☒ |
| (6) ☐ | An evacuation plan for facility personnel, where there is a possibility that evacuation could be necessary - 373-3.4(c)(6). | ☒ |
| (d) ☐ | Copies of the contingency plan are maintained at the facility - 373-3.4(d)(1). | ☒ |
| (e) ☐ | Copies of the contingency plan have been submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services - 373-3.4(d)(2). | ☒ |
| (f) ☐ | The contingency plan has been amended, as necessary, when applicable regulations were revised, the plan failed in an emergency, the facility changes or the list of emergency coordinators or equipment changes - 373-3.4(e). | ☒ |
| (g) ☐ | There is at least one employee either on the facility premises or on call with the responsibility and authority for coordinating all emergency response measures - 373-3.4(f). | ☒ |

9. Elementary Neutralization or Wastewater Treatment - 373-1.1(d)(1)(xii)

- | | | |
|------------------------------|--|-------------------------------------|
| (a) ☐ | Exempt units must comply with the following - 373-1.1(d)(1)(xii)('a'): | ☒ |
|------------------------------|--|-------------------------------------|

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

- | | | | |
|-----|--------------------------|--|-------------------------------------|
| (1) | ☐ | The requirements for personnel training in item 6, for preparedness and prevention in item 7, and for contingency plans and emergency procedures in item 8 - 373-1.1(d)(1)(xii)(‘a’)(‘1’); | ☒ |
| (2) | ☐ | Elementary neutralization units that qualify as containers must be managed in accordance with section 373-3.9 Use and Management of Containers - 373-1.1(d)(1)(xii)(‘a’)(‘2’); | ☒ |
| (3) | ☐ | All containers and tanks used to treat hazardous waste must be marked with the words "Hazardous Waste" and other words that identify the contents. For underground tanks, the marking must be placed on a sign in the area above the tank and on the fill port - 373-1.1(d)(1)(xii)(‘a’)(‘3’); and | ☒ |
| (4) | ☐ | If the owner or operator is diluting hazardous ignitable (D001) wastes (other than the D001 high TOC subcategory) or reactive (D003) waste to remove the characteristic before land disposal, the owner/operator must comply with the requirements set out in sections 373-2.2(i)(2) and 373-3.2(h)(2) - 373-1.1(d)(1)(xii)(‘a’)(‘4’); | ☐ |

10. Emergency Procedures - 373-3.4(g)

During a past emergency situation the emergency coordinator (or his designee when the emergency coordinator is not on call) did the following: - 373-3.4(g).*

*Do not go back further than the previous inspection date.

- | | | | |
|-----|--------------------------|---|--------------------------|
| (1) | ☐ | Activated internal facility alarms or communication systems; | ☐ |
| (2) | ☐ | Notified appropriate state or local agencies; | ☐ |
| (3) | ☐ | Immediately identified the character, exact source, amount and a real extent of any released materials; | ☐ |
| (4) | ☐ | The emergency coordinator assessed possible hazards to human health and the environment; | ☐ |
| (5) | ☐ | The emergency coordinator immediately notified both the department (using the New York State 24-hour oil and hazardous material spill notification number 518/457-7362), and either the government official designated as the on-scene coordinator for that geographical area (in the applicable regional contingency plan), or the National Response Center (using their 24-hour toll free number 800/424-8802); | ☐ |

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

- | | | | |
|------|--------------------------|--|--------------------------|
| (6) | ☐ | During the emergency, the emergency coordinator took all reasonable measures necessary to ensure that fire, explosions and releases do not occur, recur or spread to other hazardous waste; | ☐ |
| (7) | ☐ | The emergency coordinator monitored for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment where appropriate during the facilities response to the emergency; | ☐ |
| (8) | ☐ | The emergency coordinator provided for treating, sorting or disposing of recovered waste, contaminated soil or surface water, or any other material that resulted from a release, fire or explosion at the facility; | ☐ |
| (9) | ☐ | The emergency coordinator ensured that in the affected area no waste that may be incompatible with the released material was treated, stored or disposed of until cleanup procedures were completed; | ☐ |
| (10) | ☐ | The emergency coordinator ensured that all emergency equipment listed in the contingency plan was cleaned and fitted for its intended use before operations were resumed; | ☐ |
| (11) | ☐ | The owner or operator notified the Commissioner that the facility is in compliance with Part 373-3.4(g)(8) before operations were resumed in the affected areas of the facility; | ☐ |
| (12) | ☐ | The owner or operator noted in the operating record the time, date and details of the incident that required implementation of the contingency plan; and | ☐ |
| (13) | ☐ | The owner or operator submitted a complete written report on the incident within 15 days after the incident occurred. | ☐ |

11. Waste Water Treatment Sludges from the Metal Finishing Industry - 372.2(a)(8)(vi)

Notes:

- Such generators must comply with sections 373-3.3 and 373-3.4, subdivision 373-3.2(g), and subparagraph 376.1(g)(1)(v) of this Title -372.2(a)(8)(vi)(d)(5').
Please fill out the Preparedness and Prevention, Contingency Plan and Personnel Training section above. Also, fill out item H in Appendix A.

- | | | | |
|-----|--------------------------|--|--------------------------|
| (a) | ☐ | A generator may store wastewater treatment sludges from electroplating operations (F006) without a permit or without having interim status if the generator complies with the following - 372.2(a)(8)(vi). | ☐ |
|-----|--------------------------|--|--------------------------|

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

- | | | | |
|-------|--------------------------|---|--------------------------|
| (1) | ☐ | F006 waste is stored for less than 180 days except if the generator has received an extension - 372.2(a)(8)(vi). | ☐ |
| (2) | ☐ | The generator has implemented pollution prevention practices that reduce the amount of any hazardous substances, pollutants or contaminants entering F006 or otherwise released to the environment prior to its recycling - 372.2(a)(8)(vi)(a'); and/or | ☐ |
| (3) | ☐ | The F006 waste is legitimately recycled through metals recovery - 372.2(a)(8)(vi)(b'); | ☐ |
| (4) | ☐ | No more than 20,000 kilograms of F006 waste is accumulated on-site at any one time - 372.2(a)(8)(vi)(c'); | ☐ |
| (5) | | The F006 waste is managed in accordance with the following - 372.2(a)(8)(vi)(d'): | |
| (i) | ☐ | The F006 waste is placed in containers and the generator complies with the applicable requirements of sections 373-3.9, 373-3.27, 373-3.28, and 373-3.29 of this Title - 372.2(a)(8)(vi)(d')(1')(i); and/or | ☐ |
| (ii) | ☐ | The F006 waste is placed in tanks and the generator complies with the applicable requirements of sections 373-3.10, 373-3.27, 373-3.28, and 373-3.29 of this Title, except paragraph 373-3.10(h)(3) and subdivision 373-3.10(k) of this Title - 372.2(a)(8)(vi)(d')(1')(ii); and/or | ☐ |
| (iii) | ☐ | The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container - 372.2(a)(8)(vi)(d')(3'); | ☐ |
| (iv) | ☐ | While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste" - 372.2(a)(8)(vi)(d')(4'). | ☐ |

Company Name Durez Occidental
 EPA ID# No. NYD002106938
 Region/Inspector 9 / Zidell
 Inspection Date 20251114

APPENDIX A
LAND DISPOSAL RESTRICTIONS
 (For SQG's, LQG's and TSD's that generate and/or store)

Indicate:
 X Violations

Indicate:
 X Satisfactory
 NA Not Applicable

I. Dilution Prohibited as a Substitute for Treatment

- | | Yes | No |
|--|--------------------------|-------------------------------------|
| A. Other than as described in B. below, has the generator or TSD, in any way diluted a restricted waste or the residual from treatment of a restricted waste: - 376.1(c) (1). | ☐ | ☒ |
| 1. As a substitute for adequate treatment to achieve compliance with section 376.4. | ☐ | ☒ |
| 2. To otherwise avoid a prohibition in section 376.3. | ☐ | ☒ |
| 3. To circumvent a land disposal prohibition imposed by Titles 1, 7 and 9 of Article 27 of the ECL. | ☐ | ☒ |
| 4. Are hazardous wastes, other than wastewaters, from separate points of generation blended, commingled, or otherwise mixed in a way that dilutes, changes any of the treatability groups, subcategories, or treatment standards that individual wastes were subject to prior commingling? | ☐ | ☒ |

If yes to 1, 2, 3 or 4 above, identify the wastes and provide a brief description of the dilution process.

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

Yes No

B. Are characteristic hazardous wastes diluted (in a treatment system which treats wastes subsequently discharged to NYS waters) pursuant to a SPDES permit or for purposes of pretreatment under the Clean Water Act? [Dilution is permissible unless another method has been specified as the treatment standard in 376.4(a) or unless the waste is a D003 reactive cyanide wastewater or non-wastewater.)]

☐ ☒

C. Is combustion used to treat any of the hazardous waste codes listed in Appendix 54 (metal bearing wastes)? Combustion is prohibited unless the waste, at the point of generation or after any bona fide treatment such as cyanide destruction prior to combustion can be demonstrated to comply with one or more of the following (unless otherwise specifically prohibited from combustion):

☐ ☒

(1) the waste contains hazardous organic constituents or cyanide at levels exceeding the constituent - specific treatment standard found in 376.4(j) of this Part;

☐ ☐

(2) the waste consists of organic, debris - like materials (e.g., wood, paper, plastic, or cloth) contaminated with an inorganic metal - bearing hazardous waste;

☐ ☐

(3) the waste, at point of generation, has reasonable heating value such as greater than or equal to 5000 BTU per pound;

☐ ☐

(4) the waste is co-generated with wastes for which combustion is a required method treatment;

☐ ☐

(5) the waste is subject to Federal and/or State requirements necessitating reduction of organics (including biological agents); or

☐ ☐

(6) the waste contains greater than 1% Total Organic Carbon (TOC).

☐ ☐

D. ☐ It is a form of impermissible dilution, and therefore prohibited, to add iron filings or other metallic forms of iron to lead-containing hazardous wastes in order to achieve any land disposal restriction treatment standard for lead. - 376.1(c)(4).

☒

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

II. Testing, Tracking and Recordkeeping Requirements - 376.1(g)

- A. ☐ The generator has determined if the waste has to be treated before it can be land disposed - 376.1(g)(1)(i). ☒
- B. ☐ The determination in A. has been made by testing the waste - 376.1(g)(1)(i). ☒
- C. ☐ The determination in A. has been made by using knowledge of the waste - 376.1(g)(1)(i). ☒
- D. ☐ Alternatively, the generator must send the waste to a RCRA-permitted hazardous waste treatment facility, where the waste treatment facility must comply with the requirements of 373-2.2(e) of this Title and paragraph (2) of this subdivision - 376.1(g)(1)(i). ☒
- E. ☐ For wastes that display the characteristic of ignitability, corrosivity, reactivity or toxicity, the generator has complied with subdivision 376.1(h) [Complete Item III] - 376.1(g)(1)(i). ☒
- F. ☐ If the waste or contaminated soil does not meet the treatment standards, or if the generator chooses not to make the determination of whether the generator's waste must be treated: With the initial shipment of waste to each treatment or storage facility, the generator has sent a one-time notice to each receiving facility and placed a copy in the file. The notice must contain the following information: - 376.1(g)(1)(ii). ☒
1. ☐ EPA hazardous waste number. ☒
2. ☐ Manifest document number. ☒
3. ☐ The waste is subject to the LDRs. The constituents of concern for F001-F005, and F039, and underlining hazardous constituents unless the waste will be treated and monitored for all constituents. If all constituents will be treated and monitored, there is no need to put them all on the LDR notice. ☒
4. ☐ The notice must include the applicable wastewater/non-wastewater category and subdivisions made within a waste code based on waste-specific criteria (such as D003 reactive cyanide). ☒
5. ☐ Waste analysis data (when available). ☒

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

6. ☐ For hazardous debris, when treating with the alternative treatment technologies provided by subdivision 376.4(g): the contaminants subject to treatment, as described in paragraph 376.4(g)(2); and an indication that these contaminants are being treated to comply with subdivision 376.4(g). ☐
7. ☐ For contaminated soil subject to LDRs as provided in 376.4(k)(1), the constituents subject to treatment as described in 376.4(k)(4), and the following statement: This contaminated soil (does/does not) contain listed hazardous waste and (does/does not) exhibit a characteristic of hazardous waste and (is subject to/ complied with) the soil treatment standards as provided by 376.4(k)(3) or the universal treatment standards. ☐
- G. ☐ For waste that meets the treatment standards at the original point of generation: With the initial shipment of waste to each TSD, the generator has sent a one-time notice to each TSD receiving the waste and placed a copy in the file. The notice must include the following information: - 376.1(g)(1)(iii). ☐
1. ☐ EPA hazardous waste number. ☐
2. ☐ Manifest document number. ☐
3. ☐ The waste is subject to the LDRs. The constituents of concern for F001-F005, and F009, and underlying hazardous constituents (for wastes that are not managed in a Clean Water Act (CWA) or CWA- equivalent facility), unless the waste will be treated and monitored for all constituents. If all constituents will be treated and monitored, there is no need to put them all on the LDR notice. ☐
4. ☐ The notice must include the applicable wastewater/ non-wastewater category and subdivisions made within a waste code based on waste-specific criteria (such as D003 reactive cyanide). ☐
5. ☐ Waste analysis data (when available). ☐
6. ☐ For contaminated soil subject to LDRs as provided in 376.4(k)(1), the constituents subject to treatment as described in 376.4(k)(4), and the following statement: This contaminated soil (does/does not) contain listed hazardous waste and (does/does not) exhibit a characteristic ☐

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

of hazardous waste and (is subject to/ complied with) the soil treatment standards as provided by 376.4(k)(3) or the universal treatment standards.

7. ☐ The applicable certification.

☐

Note: If the waste changes, the generator must send a new notice and certification to the receiving facility and place a copy in the file. Generators of hazardous debris excluded from the definition of hazardous waste under paragraph 371.1(d)(5) of this Title are not subject to these requirements.

H. ☐ Wastes exempted from meeting treatment standards prior to land disposal: With the initial shipment, the generator must send a one-time notice to each land disposal facility receiving the waste. The notice must contain the following information: - 376.1(g)(1)(iv).

☐

1. ☐ EPA hazardous waste number.

☐

2. ☐ Manifest documents number.

☐

3. ☐ Statement: this waste is not prohibited from land disposal.

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4. ☐ Waste analysis data (when available).

☐

5. ☐ Date the waste is subject to the prohibition.

☐

6. ☐ For hazardous debris, when treating with the alternative treatment technologies provided by subdivision 376.4(g): the contaminants subject to treatment, as described in paragraph 376.4(g)(2); and an indication that these contaminants are being treated to comply with subdivision 376.4(g).

☐

Note: If the waste changes, the generator must send a new notice to the receiving facility and place a copy in their files.

I. Treatment of Prohibited Wastes in Containers or Tanks

☐ For generators managing a prohibited waste in tanks, containers, or containment buildings, regulated under paragraph 372.2(a)(8) and treating that waste to meet applicable treatment standards, the following requirements have been met:

☐

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

- | | | | |
|----|--------------------------|--|--------------------------|
| 1. | ☐ | Developed and followed written waste analysis plan which describes the procedures the generator will carry out to comply with the treatment standards - 376.1(g)(1)(v). | ☐ |
| 2. | ☐ | The waste analysis plan has been based on a detailed chemical and physical analysis of a representative sample of the prohibited waste(s) being treated, and contains all the information necessary to treat the waste(s), including the selected testing frequency - 376.1(g)(1)(v)(a). | ☐ |
| 3. | ☐ | Kept the plan on- site in the generator's records - 376.1(g)(1)(v)(b). | ☐ |
| 4. | ☐ | Wastes shipped off -site have complied with the notification requirements for restricted wastes meeting treatment standards - 376.1(g)(1)(v)(c). [Complete Item II.F. pgs. A- 4.] | ☐ |

J. Recordkeeping

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|----|--------------------------|---|-------------------------------------|
| 1. | ☐ | If a generator has determined whether a waste is restricted based solely on knowledge of the waste, all supporting data used to make this determination has been retained on-site in the generator's files - 376.1(g)(1)(vi). | ☒ |
| 2. | ☐ | If a generator has determined whether a waste is restricted based on testing of the waste or an extract developed using the test method 1311, all waste analysis data has been retained on-site in the generator's files - 376.1(g)(1)(vi). | ☒ |
| 3. | ☐ | If a generator has determined that he is managing a restricted waste that is excluded from the definition of hazardous or solid waste, or exempt from regulation, under 371, subsequent to the point of generation (including deactivated characteristic hazardous wastes managed in wastewater treatment systems subject to the Clean Water Act), the generator has placed in the facility's file a one-time notice stating: - 376.1(g)(1)(vii). | ☒ |
| | a. | ☐ That the waste is generated, | ☒ |
| | b. | ☐ That the waste is excluded from the definition of hazardous or solid waste or exempted from regulation. | ☒ |

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

c. ☐ The disposition of the waste.



4. ☐ Generators must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least three years from the date that the wastes were last sent to on-site or off-site treatment, storage, or disposal. This requirement applies to solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste, or exempted from regulation, subsequent to the point of generation - 376.1(g)(1)(viii).



K. Alternate Treatment Standards for Lab Packs

- ☐ If a generator is managing a lab pack containing hazardous waste and wishes to use the alternative treatment standards, the generator must submit a notice to the treatment facility with the initial shipment. The notice must contain the EPA hazardous waste codes, manifest document number, and the applicable certification. No further notification is necessary unless the wastes or receiving facility changes. For characteristic hazardous wastes (D0001- D043) underlying hazardous constituents need not be determined. The recordkeeping requirements must be met - 376.1(g)(1).



L. Small Quantity Generators with Tolling Agreements

- ☐ For small quantity generators with tolling agreements, the following requirements - 376.1(g)(1)(x).
1. ☐ For the initial shipment of such wastes, the generator has complied with the notification and certification requirements that apply for the wastes subject to the tolling agreement - 376.1(g)(1)(x). [Complete Items II.E, F, or G, Pgs A-3 through A-5, as applicable, except for manifest requirements.]
2. ☐ Small quantity generators must retain on-site a copy of the initial notification and certification, together with the tolling agreement, for at least three years after termination or expiration of the agreement - 376.1(g)(1)(x).



M. Hazardous Debris

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

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|-----------------------------|---|--------------------------|
| ☐ | Generators or treaters who first claim that hazardous debris is excluded from the definition of hazardous waste under paragraph 371.1(d)(5) of this Title, (i.e., debris treated by an extraction or destruction technology provided by Table 1, subdivision 376.4(g), and debris that the commissioner has determined does not contain hazardous waste) are subject to the following notification and certification requirements: 376.1(g)(4). | ☐ |
| 1. ☐ | A one-time notification must be submitted to the commissioner to include the following information: 376.1(g)(4). | ☐ |
| a. ☐ | The name and address of the authorized Part 360 facility receiving the treated debris - 376.1(g)(4)(i)(a). | ☐ |
| b. ☐ | A description of the hazardous debris as initially generated, including the applicable EPA or NYS Hazardous Waste Number(s) - 376.1(g)(4)(i)(b). | ☐ |
| c. ☐ | For debris excluded under subparagraph 371.1(d)(5)(i) of this Title, the technology from Table 1, subdivision 376.4(g), used to treat the debris - 376.1(g)(i)(c). | ☐ |
| 2. ☐ | The notification must be updated if the debris is shipped to a different facility, and, for debris excluded under subparagraph 371.1(d)(5)(i) of this Title, if a different type of debris is treated or if a different technology is used to treat the debris - 376.1(g)(4)(ii). | ☐ |

III. Special Rules Regarding Wastes That Exhibit a Characteristic

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|-----------------------------|--|-------------------------------------|
| A. ☐ | The initial generator of a solid waste has determined each EPA hazardous waste number (waste code) applicable to the waste in order to determine the applicable treatment standards under section 376.4 of this Part. This determination may be made concurrently with the hazardous waste determination required in paragraph 372.2(a)(2) of this Title. For purposes of Part 376, the waste will carry the waste code for any applicable listing under section 371.4 of this Title. In addition, where the waste exhibits a characteristic, the waste will carry one or more of the characteristic waste codes under section 371.3, except when the treatment standard for the listed waste operates in lieu of the treatment standard for the characteristic waste, as specified in | ☒ |
|-----------------------------|--|-------------------------------------|

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

paragraph (2) of this subdivision. If the generator determines that their waste displays a hazardous characteristic (and is not D001 non-wastewaters treated by CMBST, RORGS or POLYM of subdivision 376.1(b)(1) of this Part), in the characteristic waste - 376.1(h)(1).

- B. ☐ For a prohibited waste that is listed and also exhibits a characteristic, the treatment standard for the listed waste code will operate in lieu of the standard for the characteristic code, provided the treatment standard for the listed waste includes a treatment standard for the constituent that causes the waste to exhibit the characteristic. Otherwise the waste must meet the treatment standards for all applicable listed and characteristic codes - 376.1(h)(2). ☒
- C. ☐ Prior to land disposal, all prohibited wastes which exhibit a characteristic have been treated to the treatment standards provided in 376.4 - 376.1(h)(3). ☒
- D. ☐ Wastes that exhibit a characteristic are also subject to subdivision 376.1(g) requirements, except that once the waste is no longer hazardous, a one-time notification and certification must be placed in the generators' or treaters' files and sent to the commissioner. The notification and certification that is placed in the generators' or treaters' files must be updated if the process or operation generating the waste changes and/or if the Part 360 facility receiving the waste changes. However, the generator or treater need only notify the Department on an annual basis if such changes occur. Such notification and certification should be sent to the Department by the end of the calendar year, but no later than December 31 - 376.1(h)(4). ☐
1. ☐ The notification includes the following information - 376.1(h)(4)(i). ☐
- a. ☐ The name and address of the Part 360 facility receiving the waste - 376.1(h)(4)(i)(a). ☐
- b. ☐ A description of the waste as initially generated, including the applicable EPA Hazardous Waste Number(s) and treatability group(s), and underlying hazardous constituents, unless the waste will be treated and monitored for all underlying hazardous constituents. In that case they do not have to be listed on the notice - 376.1(h)(4)(i)(b). ☐

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

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|-----------------------------|--|--------------------------|
| 2. ☐ | The certification must be signed by an authorized representative and state the language found in subparagraph 376.1(g)(2)(iv)(<u>e</u>) - 376.1(h)(4)(ii). | ☐ |
| 3. ☐ | If the treatment removes the characteristic but does not treat underlying hazardous constituents, then the certification in 376.1(g)(2)(iv)(<u>d</u>) applies - 376.1(h)(4)(ii)(<u>a</u>). | ☐ |

IV. PCB Disposal

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|-----------------------------|--|--------------------------|
| A. ☐ | All PCB wastes listed under Part 371 solely for their PCB content, are disposed of in accordance with the provisions of 40 CFR part 761, except: - 376.4(f)(1). | ☐ |
| 1. ☐ | As listed in part 371, waste B002, from any source other than a spill, may not be stabilized or mixed with any substance to conform with any provision of 450 CFR Part 761 regarding land disposal - 376.4(f)(1)(i). | ☐ |

V. Prohibition on Storage of Restricted Wastes - 376.5(a)

- | | | |
|-----------------------------|---|-------------------------------------|
| A. ☐ | The storage of hazardous wastes restricted from land disposal is permitted provided that: - 376.5(a)(1). | ☒ |
| 1. ☐ | The generator stores such waste in tanks, containers, or containment buildings on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal and the generator complies with all storage requirements of Part 372, Subparts 373-1, 373-2, and 373-3 of this Title - 376.5(a)(1)(i). | ☒ |
| 2. ☐ | The owner or operator of a hazardous waste treatment storage, or disposal facility has: | ☐ |
| a. ☐ | Only stored restricted wastes in tanks or containers for up to one year solely for the purpose of the accumulation of such quantities as necessary to facilitate proper recovery, treatment, or disposal - 376.5(a)(1)(ii). | ☐ |
| b. ☐ | Clearly marked each container or tank to identify its contents and the date each period of accumulation begins - 376.5(a)(1)(ii)(<u>a</u>). | ☐ |

Indicate:
X Violations

Indicate:
X Satisfactory
NA Not Applicable

- c. ☐ Maintained in the operating record the contents and beginning accumulation date for each tank and container - 376.5(a)(1)(ii)(b). ☐
- d. ☐ Complied with all operating record requirements of 373-2.5(c) or 373-3.5(c) - 376.5(a)(1)(ii)(b). ☐
- B. ☐ Unless the Department can prove that such storage was not solely for the purpose of accumulation of such quantities as necessary to facilitate proper recovery, treatment or disposal, the owner/operator of a treatment, storage or disposal facility may store restricted waste for up to one year - 376.5(a)(2). ☐
- C. ☐ The owner/operator of a treatment, storage or disposal facility has stored restricted waste beyond one year and has proven that the storage was solely for the purpose of accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal - 376.5(a)(3). ☐
- D. ☐ Liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm have been stored at facilities that meet the requirements of 371 through 376 and 40 CFR 761.65(b), and have been removed from storage and treated or disposed of as required within one year of the date when such wastes were placed in storage - 376.5(a)(6). ☐