Glenn Springs Holdings, Inc.
A subsidiary of Occidental Petroleum

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June 19, 2009

Mr. Brian Sadowski
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, NY 14203-2999

Dear Mr. Sadowski:

Re: Responses to 2008 Annual Report NYSDEC Comments Dated June 9, 2009
102nd Street Landfill
Niagara Falls, New York

In coordination with Glenn Springs Holding, Inc. (GSH), Conestoga-Rovers & Associates (CRA) has prepared the following responses to comments dated June 9, 2009 from the New York State Department of Environmental Conservation (NYSDEC) regarding the 102nd Street Landfill (Site) 2008 Annual Report.

Comment 1: Well PCM-07 was replaced with well PCM-07R in October 2007 because groundwater elevations consistently showed an outward gradient. An outward gradient apparently still exists by figure B.7. It was also noted that on page 5, section 3.2 Groundwater Quality Monitoring Results of the Overburden Monitoring Wells indicates that Well PCM-07R did not yield sufficient volumes for collection of a sample in May 2008. Considering that an outward gradient still exists, it is imperative that samples are collected. If a volume shortage exists to do a full scan after purging, the samplers need to return to the well to check recovery and grab what is available. It is better to have at least a volatile analysis than nothing.

Response: Agreed. Every attempt will be made to obtain the required sample volume.

CRA's groundwater sampling procedure is such that if recharge to the well is insufficient to collect the full sample volume after purging (via low flow purging or removal of five well volumes), the well will be pumped dry and allowed to recover for a period not more than 24 hours. Sample collection will be attempted within 24 hours after being pumped to dryness with the priority of parameters collected as follows:

1. Volatile Organic Compounds (VOCs)
2. Semi-Volatile Organic Compounds (SVOCs)
3. Pesticides
4. Metals
5. Wet Chemistry

If insufficient water is available to complete the full sample volume after 24 hours, the well will be allowed to recover for up to an additional 72 hours in an attempt to collect the full sample volume. Please note that full sample volumes were collected from PCM-07R in November 2008 and March 2009, indicating that the well is functioning properly.

Comment 2: Page 5. Section 3.3 NAPL Presence Monitoring Results, second paragraph. "NAPL was present in five of eight NR wells in 2008". "Thickness of the NAPL ranged from 0.13' (NR-03) to 2.79' (NR-01)". We read the table as 4.10' in NR-01 on 12/15/08. Please clarify.

Response: The 2.79-feet thickness of non-aqueous phase liquid (NAPL) in NR-01 in Section 3.3 is incorrect. The thickness of 4.10 feet in Table A-2 is the correct maximum thickness of NAPL in the NR wells in 2008. This will be corrected in the revised report.

Comment 3: Page 6. Section 4.0 Operation of 102nd. Street Landfill Systems, sub-section 4.2 NAPL Recovery. The last sentence refers to Table 4.1. Table 4.1 has the wells identified as NR-1 through NR-10, but in Appendix A Annual Report Forms and figure 1.1 these wells are listed as NR-01, NR-02, NR-03 etc. Please be consistent with the identifications in the text, figures and tables.

Response: The names of the well locations will be corrected to be consistent throughout the revised report.

Comment 4: Page 6. Section 4.2. NAPL Recovery. Second Paragraph. The last sentence reads, "In 2008, NAPL was recovered continuously from April through December from NR-2 for a total NAPL recovery of 6,298. By Table 4.1 the amount of NAPL recovered from NR-2 in 2008 was 6,189 gallons. The total gallonage of all NR wells was 6,298. Please clarify this discrepancy.

Response: Section 4.2 of the text is incorrect. The correct amount of NAPL collected from NR-2 in 2008 was 6,189 gallons. The total amount of NAPL collected from all NR wells in 2008 was 6,298 gallons. This will be corrected in the revised text.

Comment 5: Table 2.4 Analytical Results Summary, PCM-07R. Results for pesticides are below the Survey Level, however, they are above NYSDEC GA groundwater criteria. Therefore, these results should be in bold brackets. Additionally, under Notes:, a bold bracket symbol should be inserted with the word(s) Exceedance or above NYSDEC Glass GA criteria.

Response: Table 2.1 in the "Operation and Maintenance Manual" (CRA, 2001) (O&M) shows only the "Survey Levels" as criteria for the Site parameters. It is not stated in the O&M that the Site parameters are to be compared to the NYSDEC Class GA GW criteria. GSH respectfully requests clarification for the comparison of the Site parameters to both the Survey Levels and the NYSDEC Class GA GW criteria. However, in an effort to address the NYSDEC's June 9, 2009 comment, the NYSDEC Class GA GW criteria have been boxed as exceedances in the revised report.

Comment 6: Appendix A, table A-2, Annual Operation and Maintenance Report, NAPL Presence - Monitoring. The Depth of NAPL for removal met the criteria (exceedance of six inches) based on p.6, section 3.2 NAPL Collection System Operation in the August 17, 2001 OM&M Manual in eight of fourteen measurements during the third and fourth quarter of 2008, but zero gallons was removed. Why wasn't NAPL removed?

Response: During Third Quarter 2008, former GSH personnel conducted NAPL presence monitoring, but no records could be found to indicate that NAPL was removed. During Fourth Quarter 2008, CRA personnel conducted NAPL presence monitoring but did not remove NAPL due to transitional oversight. This oversight has been corrected. CRA personnel conducted NAPL presence checks and removed NAPL during First Quarter 2009 and will continue to remove NAPL as necessary during future NAPL presence events (quarterly between April and October).

***Comment 7**: Appendix A, table A-5, Annual Operation and Maintenance Report, Distribution. Lorraine Miller of the Olin Chemical Group is listed to receive a report copy. The Department believes that Michael J. Bellotti of the Olin Chemical Group is the lead project manager. Please clarify and correct if necessary. In addition, remove the Director, Environmental Remediation and insert Gerald Rider, Chief, Section D for the Albany office. Please insert Gregory P. Sutton as the Regional Remediation Engineer for the NYSDEC Buffalo office.*

Response: The requested changes will be made in the revised report.

***Comment 8**: Figure B.7. Groundwater Levels Well Pair 7. PCM-07R has replaced PCM-07. The groundwater elevation tracking and bottom tracking should reflect this in the legend as the well identity. Also, it is believed that the bottom elevation should have changed and not remained the same after PCM-07R was installed in October 2007. Please clarify and make the changes as necessary.*

Response: Figure B.7 will be revised to reflect the October 2007 installation of PCM-07R to replace PCM-07.

As requested, a revised hardcopy of the entire report will be resubmitted along with an electronic version in PDF file format.

Please contact me with any questions or comments you may have at 972-687-7506.

Yours truly,

Michael J. Bellotti

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CONESTOGA-ROVERS
& ASSOCIATES

2008 ANNUAL REPORT
102ND STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

GLENN SPRINGS HOLDINGS, INC.
NIAGARA FALLS, NEW YORK

JUNE 2009
REF. NO. 001431 (84)

EXECUTIVE SUMMARY

The following report describes the Operation and Maintenance (O&M) activities for 2008 at the 102nd Street Landfill Site (Site) located in Niagara Falls, New York. The Site covers approximately 22.1 acres and consists of two separate properties owned by Occidental Chemical Corporation (OCC) (15.6 acres) and Olin Corporation (Olin) (6.5 acres). Both OCC's and Olin's responsibilities at the Site are currently operated by Conestoga-Rovers & Associates (CRA), under the direct supervision of Glenn Springs Holdings, Inc. (GSH), an affiliate of OCC.

During 2008, the Remedial Action (RA) system components at the Site performed as designed. The leachate collection system removed 289,738 gallons Aqueous Phase Leachate (APL) from the Site. Water level monitoring showed that an inward gradient continues to be maintained for 100 percent of the time at nine of the well pairs. Only one well pair (PCM-07R/PZ-07) on the north side of the Site indicated than an inward gradient was not maintained (four of the four monitoring events) in that location. However, analytical results indicate no Site parameters were observed above the survey levels (Site baseline guidance values form Table 2.1 of the Site O&M Manual, 2001) outside of the slurry wall at PCM-07R.

In 2008, 6,298 gallons of Non-Aqueous Phase Leachate (NAPL) were recovered from the Site NAPL Recovery Wells. The recovered NAPL was then sent to an off-Site incinerator (Clean Harbors, Deer Park, Texas) for final destruction.

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1.0 INTRODUCTION

The following report describes the Operation and Maintenance (O&M) activities for 2008 at the 102nd Street Landfill Site (Site) located in Niagara Falls, New York. Both Occidental Chemical Corporation's (OCC's) and Olin Corporation's (Olin's) responsibilities at the Site are currently operated by Conestoga-Rovers &Associates (CRA), under the direct supervision of Glenn Springs Holdings, Inc. (GSH), an affiliate of OCC.

The Site covers approximately 22.1 acres and consists of two separate properties owned by OCC (15.6 acres) and Olin (6.5 acres). The Site is bordered by the Niagara River to the south, Buffalo Avenue to the north, Griffon Park to the west, and privately owned land to the east. A perimeter fence restricts Site access. Authorized vehicular traffic access is provided from Buffalo Avenue by locked fence gates.

Remedial construction at the Site was completed in 1999, and groundwater pumping began in March 1999. The groundwater collection system at the Site is shown on Figure 1.1.

Final responses to the comments for the Final Closure Report for the Site were submitted to the New York State Department of Environmental Conservation (NYSDEC) and the United States Environmental Protection Agency (USEPA) (collectively, the "Agencies") on September 22, 2000. Final approval of the O&M (CRA, 2001) was received on October 24, 2001. The Certificate of Completion for the Site was accepted by the Agencies on March 13, 2002, signifying that all remedial work had been completed. Subsequently, the formal initiation of the O&M for the Site occurred in April 2002. This report is the seventh annual report for the Site.

The Remedial Action (RA) system components at the Site that have associated O&M activities are as follows:

- Landfill cap
- Perimeter slurry wall
- Aqueous Phase Liquid (APL) collection and discharge system
- Non-Aqueous Phase Liquid (NAPL) recovery system
- Post-RA system performance monitoring
- Perimeter fence

2.0 SITE MONITORING PROGRAMS

The post-RA system performance monitoring program includes quarterly groundwater level monitoring events, semiannual groundwater quality monitoring events, and quarterly NAPL presence monitoring. It was established to monitor the effectiveness of the RA system components.

2.1 HYDRAULIC MONITORING PROGRAM

Hydraulic monitoring at the Site consists of the measurement of water levels in monitoring wells to determine groundwater elevations. This monitoring includes ten piezometers (PZ-01 through PZ-10) inside the slurry wall and ten monitoring wells (PCM-01 through PCM-10) outside the slurry wall. The measurements are used to evaluate Site performance toward establishment of an inward gradient by pairing wells (one inside the slurry wall and one outside the slurry wall) and demonstrating an inward gradient at each well pair. The established well pairs are listed in Table 2.1.

Water level measurements in the piezometers and monitoring wells were measured quarterly in 2008, in accordance with the O&M manual. The 2008 water level measurements have been converted to elevations and are presented in Table 2.2. The elevations for each of the well pairings and the gradients achieved for the quarterly events throughout the year are presented in Table 2.3.

Water level data have been converted to elevations and are listed on the Annual Report Forms (Appendix A). Data for 2002 through 2008 have also been graphed to show groundwater elevation trends (Appendix B).

2.2 GROUNDWATER QUALITY MONITORING PROGRAM

The groundwater quality monitoring program consists of ten overburden monitoring wells (PCM-01 through PCM-10) and three bedrock wells (PCBM-01 through PCBM-03). These wells were sampled quarterly for the first 2 years following the initiation of the O&M, and then scheduled for semiannual sampling for 8 years thereafter. Semiannual sampling will continue through 2011. In 2012, sampling will go to an annual frequency.

Groundwater quality monitoring was performed semiannually in May and November 2008. Table 2.4 presents the results of these groundwater monitoring events.

Concentrations present in the groundwater have been graphed to determine if any of the levels are increasing. These graphs are presented in Appendix C.

2.3 NAPL PRESENCE MONITORING PROGRAM

The NAPL presence monitoring program consists of eight NAPL Recovery (NR) wells (NR-01 through NR-05, NR-07, NR-08, and NR-10). NAPL presence monitoring began in these wells in April 2002, immediately after the USEPA approved the Certificate of Completion. In accordance with the O&M manual (CRA, 2001), NAPL presence was checked each month for the first 3 months. This monthly monitoring ended in June 2002. After June 2002, the NAPL presence monitoring went to a quarterly frequency. Results of the NAPL presence monitoring are presented on the Annual Report Forms presented in Appendix A.

3.0 SITE MONITORING RESULTS

3.1 HYDRAULIC MONITORING RESULTS

Inward gradients towards the landfill were demonstrated all wells pairs with the exception of well pair 7 (PCM-07R/PZ-07) (see Table 2.3). An inward gradient was not maintained at any of the quarterly events for well pair 7, as demonstrated in Table 2.3.

Review of Table 2.3 appears to indicate that well pairs 6, 8, and 9 do not demonstrate inward gradients for all for quarterly events. However, where water level data is available, an inward gradient exists at all three of these well pairs. It is only the absence of water level data (wells were dry) that would indicate that an inward gradient may not have been present at these well pairs. When the bottom elevations of PZ-08 and PZ-09 are taken into account when those wells were measured as dry, it is apparent that an inward gradient was being maintained (the water level elevation in the wells outside the slurry wall is higher than the elevation of the bottom of the dry wells inside the slurry wall).

During the first, second, and fourth quarters of 2008, well pair 6 (PCM-06/PZ-06) was dry. Therefore, it is unknown whether an inward gradient was maintained during those events. During the third quarter event, well pair 6 demonstrated an inward gradient.

PCM-07R was installed as a replacement for PCM-07 in October 2007. Evaluation of PCM-07 in 2006 demonstrated that the well was not monitoring the same interval as PZ-07. The well pairs at the Site were installed such that they monitored the same intervals in order to demonstrate inward gradients. However, the overlap of the screens in PCM-07 and PZ-07 was only 0.83 foot. Therefore, PCM-07 was abandoned and replaced with PCM-07R. PZ-07 is screened from 564.8 feet above mean sea level (AMSL) to 569.8 feet AMSL. PCM-07R is screened from 564.12 feet AMSL to 569.12 feet AMSL. The overlap of the well screens is now 4.6 feet, which will insure an accurate calculation of inward hydraulic gradients.

However, even with the replacement of PCM-07, the calculations in Table 2.3 demonstrate that an inward gradient is not being maintained at this well pair. PCM-07R will be redeveloped prior to the next sampling event (November 2009) to ensure that the well screen is functioning properly.

3.2 GROUNDWATER QUALITY MONITORING RESULTS

Overburden Monitoring Wells

In 2008, groundwater samples were obtained from eight of the ten monitoring wells included in the semiannual analytical program. Well PCM-07R did not yield sufficient volume for collection of a sample in May 2008. Wells PCM-06 and PCM-09 did not yield sufficient volume for collection of samples in both May and November 2008. Site survey levels were exceeded in three of the eight overburden monitoring wells in 2008. Wells PCM-03, PCM-04, and PCM-05 demonstrated exceedances of volatile organic compounds (VOCs) (benzene, chlorobenzene, dichlorobenzene, and trichlorobenzene), and PCM-03 and PCM-04 demonstrated exceedances of semi-volatile organic compounds (SVOCs) (chlorophenol and dichlorophenol).

Bedrock Monitoring Wells

Site survey levels were not exceeded in any of the three bedrock monitoring wells that were sampled for groundwater quality in 2008.

3.3 NAPL PRESENCE MONITORING RESULTS

NAPL presence monitoring of the eight NR wells (NR-01, NR-02, NR-03, NR-04, NR-05, NR-07, NR-08, and NR-10) began in April 2002 immediately after USEPA approved the Certificate of Completion. In accordance with the approved O&M manual, NAPL presence was checked each month for the first 3 months (ending in 2002) and has been checked quarterly thereafter. Results of this monitoring are presented in the Annual Report Forms presented in Appendix A.

NAPL was present in five of the eight NR wells in 2008. Thickness of the NAPL ranged from 0.13 foot (NR-03) to 4.10 feet (NR-01).

4.0 OPERATION OF 102ND STREET LANDFILL SYSTEMS

4.1 APL COLLECTION AND DISCHARGE SYSTEM OPERATION

The individual APL pumps in the APL collection wet wells operated throughout 2008 on level control. All well pumps were set to start up at an elevation of 562.1 AMSL (1 foot below the average Niagara River water level) and shut down when elevations in the wells reached 561.8 AMSL.

A total of 289,738 gallons of APL were removed from the Site and pumped to the Love Canal Treatment Facility (LCTF). There, the APL was treated and discharged to the City of Niagara Falls Sanitary Sewer System. A total of approximately 7.3 million gallons have been recovered from the Site since pumping was initiated in March 1999.

Wet Wells 1 through 4 collect APL at the Site. In 2008, Wet Well 1 collected 36,806 gallons of APL (12.7 percent of the total for the Site), Wet Well 2 collected 220,224 gallons of APL (76 percent), Wet Well 3 collected 22,644 gallons of APL (7.8 percent), and Wet Well 4 collected 10,090 gallons of APL (3.5 percent).

4.2 NAPL RECOVERY

A total of 6,298 gallons (approximately three tanker trailers) of NAPL was removed from the NR wells at the Site in 2008. The majority of the NAPL was pumped from NR-02. The NAPL was transported to Clean Harbors Facility in Deer Park, Texas for incineration.

A concentrated effort was implemented in 2004 to extract NAPL using NR-02, in accordance with the approved Work Plan "NAPL Extraction Program Work Plan for Accelerated Recovery" submitted to the NYSDEC in December 2003. This task was achieved by concentrating on the known quick recharge well NR-02. In 2008, NAPL was recovered continuously from April through December from NR-02 for a total NAPL recovery of 6,189 gallons.

Table 4.1 shows the current and historical NAPL recoveries from the on-Site NR wells.

5.0 SITE MAINTENANCE AND INSPECTIONS

5.1 SITE INSPECTIONS

The 2008 annual Site inspection was held on May 28, 2008 with representatives from NYSDEC and GSH. The Site inspection reviews the Remedial Action System Components to ensure Site compliance.

The inspection included a general walk-around the Site and covered all portions of the landfill remediation including the APL Collection System, APL Discharge System, Landfill Cap, Bulkhead, and Storm Sewer.

In general, the NYSDEC commented that the Site looked well maintained and in very good order, with no evidence of erosion. Listed below are items to be addressed:

- Clean out of drifted wood and debris along shoreline and near grating at storm sewer outlet in warmer weather (i.e., July).
- Repair section along Buffalo Avenue near 102nd Street that has heaved. Inquiry will be made to vendor about alternate methods of securing fencing in the area.
- Fill larger burrow holes as needed.

5.2 MAINTENANCE

Maintenance performed at the Site in 2008 included the following:

- Mowing the landfill vegetation to inhibit the growth of woody material
- Filling of holes found in the soil cover made by burrowing animals
- Repair to sign along Buffalo Avenue (repair and anchoring of supports)
- Maintenance (including scheduled preventative maintenance) of all pumps and on-Site control equipment to ensure proper function
- Installation of a bladder pump into PCM-06

5.3 SITE BEAUTIFICATION/WILDLIFE

Wildlife/beautification enhancements to the Site continue to provide wildlife habitat and beneficial reuse.

6.0 CONCLUSION

The 2008 data indicate that there has been no significant change in chemical and hydrogeological conditions at the Site. A total of 289,768 gallons of APL were removed from the Site and pumped to the LCTF for treatment and disposal. A total of 6,298 gallons of NAPL were recovered and sent off Site for incineration. The forcemain system continues to pump sufficient leachate from the landfill so as to maintain an inward gradient across the slurry wall. The slurry wall is functioning as designed, preventing off-Site migration and influx of groundwater.

FIGURES

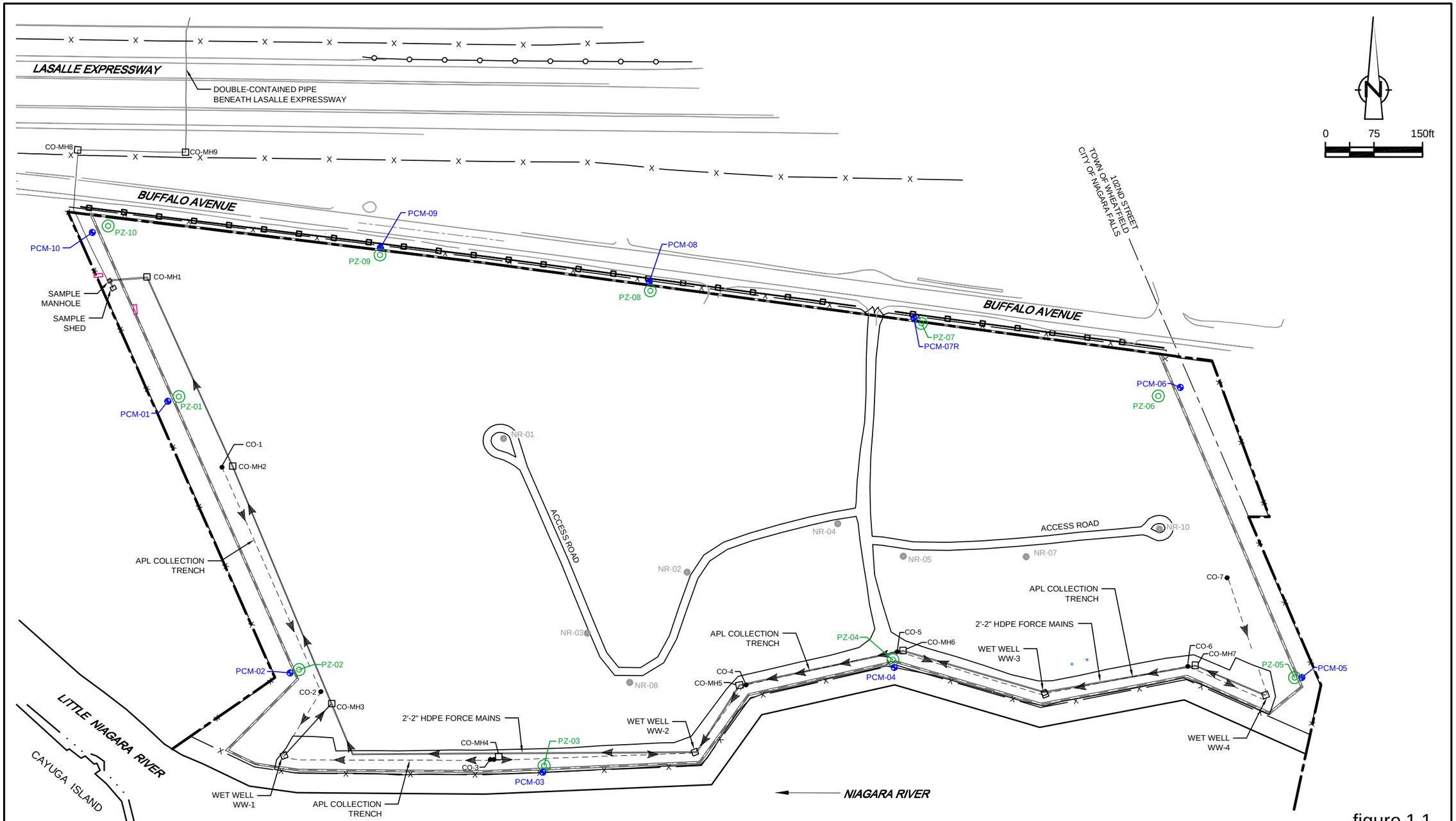


figure 1.1

GROUNDWATER COLLECTION SYSTEM
2008 ANNUAL REPORT
102ND STREET LANDFILL SITE
GLENN SPRINGS HOLDINGS, INC.
Niagara Falls, New York

01431-05(084)GN-WA001 MAY 27/2009

TABLES

TABLE 2.1

HYDRAULIC GRADIENT WELL PAIRS
GLENN SPRINGS HOLDINGS, INC.
102nd STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

Pair	*Outside*	*Inside*	*Location*
1	PCM-01	PZ-01	West Side
2	PCM-02	PZ-02	Southwest Side
3	PCM-03	PZ-03	South Side
4	PCM-04	PZ-04	South Side
5	PCM-05	PZ-05	Southeast Side
6	PCM-06	PZ-06	Northeast Side
7	PCM-07R	PZ-07	North Side
8	PCM-08	PZ-08	North Side
9	PCM-09	PZ-09	North Side
10	PCM-10	PZ-10	Northwest Side

TABLE 2.2

QUARTERLY WATER LEVEL ELEVATIONS - 2008
GLENN SPRINGS HOLDINGS, INC.
102nd STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

Location	*Ref Elev.*	*March 28, 2008*	*May 5, 2008*	*August 20, 2008*	*December 15, 2008*
NR-01	597.30	562.60	562.40	562.56	562.58
NR-02	589.73	562.43	562.35	562.49	562.30
NR-03	591.70	559.70	559.36	559.65	559.46
NR-04	582.39	562.34	562.30	562.36	562.20
NR-05	581.55	562.24	562.40	562.00	562.11
NR-07	587.21	562.14	562.08	562.31	562.08
NR-08	592.31	562.88	562.85	562.66	562.29
NR-10	587.87	562.36	562.22	562.37	562.17
PCBM-01	576.75	563.82	563.95	563.91	564.02
PCBM-02	576.03	563.79	563.85	563.88	564.01
PCBM-03	580.24	564.33	564.10	564.07	564.74
PCM-01	578.24	568.42	568.24	566.69	567.62
PCM-02	577.24	567.74	567.14	566.19	567.56
PCM-03	576.81	563.20	563.81	563.81	563.33
PCM-04	575.73	563.33	563.94	567.37	563.54
PCM-05	575.93	564.95	564.27	563.79	564.93
PCM-06	580.25	Dry	Dry	570.12	Dry
PCM-07R	579.58	565.51	565.88	566.51	565.57
PCM-08	579.32	571.03	569.60	569.76	570.82
PCM-09	578.99	572.26	570.75	570.94	571.80
PCM-10	579.40	568.01	567.36	566.36	568.15
PZ-01	582.21	563.91	563.68	563.56	563.72
PZ-02	577.92	562.57	562.44	562.64	562.24
PZ-03	576.68	562.06	561.81	562.63	561.65
PZ-04	576.96	562.49	562.26	562.46	562.18
PZ-05	576.87	561.96	561.82	562.21	561.71
PZ-06	584.66	Dry	Dry	564.76	Dry
PZ-07	579.10	566.00	566.67	566.68	566.36
PZ-08	580.99	566.09	566.07	566.19	Dry
PZ-09	580.67	Dry	Dry	566.58	Dry
PZ-10	581.65	564.89	565.02	564.94	564.92
RIVERNPIER	567.02	563.10	563.64	563.66	563.22
WW-1	575.80	562.40	561.70	562.21	561.53
WW-2	569.28	555.38	555.58	556.18	555.48
WW-3	575.62	561.85	561.79	562.26	561.71
WW-4	575.97	561.85	561.71	562.17	561.57

TABLE 2.3

WELL PAIR GRADIENTS - 2008
GLENN SPRINGS HOLDINGS, INC.
102nd STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

		Elevation (ft AMSL)						
	Pairs	*TOC*	*Bottom*	*March 28, 2008*	*May 5, 2008*	*August 20, 2008*	*December 15, 2008*	*Quarters Maintaining Inward Gradient*
Pair 1	PCM-01	578.24	549.05	568.42	563.95	563.91	564.02	
	PZ-01	582.21	549.64	563.91	563.68	563.56	563.72	
				-4.51	-0.27	-0.35	-0.3	4
Pair 2	PCM-02	577.24	547.90	567.74	567.14	566.19	567.56	
	PZ-02	577.92	548.43	562.57	562.44	562.64	562.24	
				-5.17	-4.7	-3.55	-5.32	4
Pair 3	PCM-03	576.81	545.15	563.2	563.81	563.81	563.33	
	PZ-03	576.68	545.63	562.06	561.81	562.63	561.65	
				-1.14	-2	-1.18	-1.68	4
Pair 4	PCM-04	575.73	545.74	563.33	563.94	567.37	563.54	
	PZ-04	576.96	545.63	562.49	562.26	562.46	562.18	
				-0.84	-1.68	-4.91	-1.36	4
Pair 5	PCM-05	575.93	550.00	564.95	564.27	563.79	564.93	
	PZ-05	576.87	550.50	561.96	561.82	562.21	561.71	
				-2.99	-2.45	-1.58	-3.22	4
Pair 6	PCM-06	580.25	566.50	Dry	Dry	570.12	Dry	
	PZ-06	584.66	564.05	Dry	Dry	564.76	Dry	
				NA	NA	-5.36	NA	1
Pair 7	PCM-07R	579.58	557.63	565.51	565.88	566.51	565.57	
	PZ-07	579.10	564.80	566	566.67	566.68	566.36	
				0.49	0.79	0.17	0.79	0

TABLE 2.3

WELL PAIR GRADIENTS - 2008
GLENN SPRINGS HOLDINGS, INC.
102nd STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

		Elevation (ft AMSL)						
	Pairs	*TOC*	*Bottom*	*March 28, 2008*	*May 5, 2008*	*August 20, 2008*	*December 15, 2008*	*Quarters Maintaining Inward Gradient*
Pair 8	PCM-08	579.32	564.43	571.03	569.6	569.76	570.82	
	PZ-08	580.99	565.38	566.09	566.07	566.19	Dry	
				-4.94	-3.53	-3.57	NA	3*
Pair 9	PCM-09	578.99	567.87	572.26	570.75	570.94	571.8	
	PZ-09	580.67	566.28	Dry	Dry	566.58	Dry	
				NA	NA	-4.36	NA	1*
Pair 10	PCM-10	579.40	556.39	568.01	567.36	566.36	568.15	
	PZ-10	581.65	561.56	564.89	565.02	564.94	564.92	
				-3.12	-2.34	-1.42	-3.23	4

Notes:

ft AMSL	Feet above mean sea level.
-3.53	Negative number indicates an inward gradient.
Dry	No water in well during time of measurement.
NA	Gradient unable to be calculated due to dry well.
*	When the bottom elevation of the well is taken into account, all four quarters demonstrate inward gradients.

TABLE 2.4

ANALYTICAL RESULTS SUMMARY - 2008
GLENN SPRINGS HOLDINGS, INC.
102nd STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

			Sample Location:	PCBM-01		PCBM-02			PCBM-03	
			Sample ID:	PCBM-01-0508	PCBM-01-1108	PCBM-02-0508	PCBM-02-1108	PCM-12-1108	PCBM-03-0508	PCBM-03-1108
			Sample Date:	5/21/2008	11/11/2008	5/22/2008	11/11/2008	11/11/2008 Duplicate	5/23/2008	11/10/2008
Parameters	*NYSDEC Class GA GW Criteria*	*Survey Level*	*Units*							
Volatile Organic Compounds										
1,2,3-Trichlorobenzene	5	10	ug/L	2.5 U	0.50 U	0.50 U	0.50 U	2.5 U	2.5 U	0.50 U
1,2,4-Trichlorobenzene	5	10	ug/L	2.5 U	0.50 U	0.50 U	0.50 U	2.5 U	2.5 U	0.50 U
1,2-Dichlorobenzene	3	10	ug/L	2.5 U	0.50 U	0.50 U	0.50 U	2.5 U	2.5 U	0.50 U
1,4-Dichlorobenzene	3	10	ug/L	2.5 U	0.50 U	0.50 U	0.50 U	2.5 U	2.5 U	0.50 U
2-Chlorotoluene	5	5	ug/L	2.5 U	0.50 U	0.50 U	0.50 U	2.5 U	2.5 U	0.10 J
Benzene	1	5	ug/L	2.5 U	0.50 U	0.50 U	0.50 U	2.5 U	2.5 U	0.50 U
Chlorobenzene	5	5	ug/L	2.5 U	0.50 U	0.50 U	0.50 U	2.5 U	2.5 U	0.50 U
Semi-volatile Organic Compounds										
1,2,4,5-Tetrachlorobenzene	5	10	ug/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
2,4,5-Trichlorophenol	1	50	ug/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
2,4-Dichlorophenol	1	10	ug/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
2,5-Dichlorophenol	1	10	ug/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
2-Chlorophenol	1	10	ug/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
4-Chlorophenol	1	10	ug/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
Phenol	1	10	ug/L	5.0 U	5.0 U	5.0 UJ	5.0 U	5.0 U	5.0 U	5.0 U
Metals										
Arsenic	25	50	ug/L	10.0 U	10.0 U	10.0 U	10.0 U	10.0 U	10.0 U	10.0 U
Mercury	0.7	0.10	ug/L	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U
Pesticides										
alpha-BHC	0.01	10	ug/L	0.25 U	0.01 J	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U
beta-BHC	0.04	10	ug/L	0.56	0.050 U	0.050 U	0.031 J	0.050 U	0.050 U	0.050 U
delta-BHC	0.04	10	ug/L	0.81	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U
gamma-BHC (Lindane)	0.05	10	ug/L	0.25 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U

Notes:
µg/L Micrograms per liter.
J Estimated concentration.
U Not present at or above the associated value.
UJ Estimated reporting limit.
Exceedance of NYSDEC Class GA GW Criteria and/or Survey Level.

TABLE 2.4

ANALYTICAL RESULTS SUMMARY - 2008
GLENN SPRINGS HOLDINGS, INC.
102nd STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

			Sample Location:	PCM-01		PCM-02		PCM-03		
			Sample ID:	PCM-01-0508	PCM-01-1108	PCM-02-0508	PCM-02-1108	PCM-03-0508	PCM-12-0508	PCM-03-1108
			Sample Date:	5/27/2008	11/10/2008	5/27/2008	11/11/2008	5/21/2008	5/21/2008 Duplicate	11/11/2008
Parameters	*NYSDEC Class GA GW Criteria*	*Survey Level*	*Units*							
Volatile Organic Compounds										
1,2,3-Trichlorobenzene	5	10	ug/L	0.50 UJ	0.50 U	0.50 U	0.50 U	130 U	130 U	130 U
1,2,4-Trichlorobenzene	5	10	ug/L	0.50 UJ	0.50 U	0.50 U	0.50 U	51 J	130 U	130 U
1,2-Dichlorobenzene	3	10	ug/L	0.50 UJ	0.50 U	0.50 U	0.50 U	130 U	130 U	87 J
1,4-Dichlorobenzene	3	10	ug/L	0.50 UJ	0.50 U	0.50 U	0.20 J	440	430	380
2-Chlorotoluene	5	5	ug/L	0.50 UJ	0.50 U	0.50 U	0.50 U	130 U	130 U	130 U
Benzene	1	5	ug/L	0.50 UJ	0.50 U	0.50 U	0.13 J	47 J	51 J	73 J
Chlorobenzene	5	5	ug/L	0.50 UJ	0.50 U	0.21 J	0.19 J	4300	4300	4000
Semi-volatile Organic Compounds										
1,2,4,5-Tetrachlorobenzene	5	10	ug/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
2,4,5-Trichlorophenol	1	50	ug/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
2,4-Dichlorophenol	1	10	ug/L	5.0 U	5.0 U	5.0 U	5.0 U	28	26	12
2,5-Dichlorophenol	1	10	ug/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	7.5	22
2-Chlorophenol	1	10	ug/L	5.0 U	5.0 U	5.0 U	5.0 U	37	35	13
4-Chlorophenol	1	10	ug/L	5.0 U	5.0 U	5.0 U	5.0 U	77	67	29
Phenol	1	10	ug/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	1.1 J	0.58 J
Metals										
Arsenic	25	50	ug/L	10.0 U	10.0 UJ	10.0 U	10.0 U	10.0 U	10.0 U	10.0 U
Mercury	0.7	0.10	ug/L	0.20 U	0.20 UJ	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U
Pesticides										
alpha-BHC	0.01	10	ug/L	0.050 UJ	0.050 UJ	0.050 UJ	0.050 U	0.25 U	0.25 U	1.0 U
beta-BHC	0.04	10	ug/L	0.050 UJ	0.050 UJ	0.050 UJ	0.050 U	0.48	0.46	5.6
delta-BHC	0.04	10	ug/L	0.050 UJ	0.050 UJ	0.050 UJ	0.050 U	0.6	0.68	1.1
gamma-BHC (Lindane)	0.05	10	ug/L	0.050 UJ	0.050 UJ	0.050 UJ	0.050 U	0.25 U	0.25 U	1.0 U

Notes:
µg/L Micrograms per liter.
J Estimated concentration.
U Not present at or above the associated value.
UJ Estimated reporting limit.
Exceedance of NYSDEC Class GA GW Criteria and/or Survey Level.

TABLE 2.4

ANALYTICAL RESULTS SUMMARY - 2008
GLENN SPRINGS HOLDINGS, INC.
102nd STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

			Sample Location:	PCM-04		PCM-05		PCM-07R	PCM-08	
			Sample ID:	PCM-04-0508	PCM-04-1108	PCM-05-0508	PCM-05-1108	PCM-7R-1108	PCM-08-0508	PCM-08-1108
			Sample Date:	5/21/2008	11/11/2008	5/22/2008	11/11/2008	11/12/2008	5/23/2008	11/10/2008
Parameters	*NYSDEC Class GA GW Criteria*	*Survey Level*	*Units*							
Volatile Organic Compounds										
1,2,3-Trichlorobenzene	5	10	ug/L	500 U	360 U	2.5 U	3.6 U	0.50 U	0.50 U	0.50 U
1,2,4-Trichlorobenzene	5	10	ug/L	500 U	360 U	2.5 U	3.6 U	0.21 J	0.50 U	0.50 U
1,2-Dichlorobenzene	3	10	ug/L	500 U	360 U	2.5 U	3.6 U	0.50 U	0.50 U	0.50 U
1,4-Dichlorobenzene	3	10	ug/L	400 J	400	2.5 U	3.6 U	0.50 U	0.50 U	0.50 U
2-Chlorotoluene	5	5	ug/L	500 U	360 U	2.5 U	3.6 U	0.79	0.50 U	2.8
Benzene	1	5	ug/L	500 U	360 U	2.2 J	5.5	0.50 U	0.50 U	0.50 U
Chlorobenzene	5	5	ug/L	12000	11000	72	110	0.50 U	0.50 U	0.50 U
Semi-volatile Organic Compounds										
1,2,4,5-Tetrachlorobenzene	5	10	ug/L	5.0 U	5.0 U	5.0 UJ	R	5.0 U	5.0 U	5.0 U
2,4,5-Trichlorophenol	1	50	ug/L	5.0 U	5.0 U	5.0 UJ	R	5.0 U	5.0 U	5.0 U
2,4-Dichlorophenol	1	10	ug/L	1.6 J	0.88 J	5.0 UJ	R	5.0 U	5.0 U	5.0 U
2,5-Dichlorophenol	1	10	ug/L	2.0 J	5.0 U	5.0 UJ	R	5.0 U	5.0 U	5.0 U
2-Chlorophenol	1	10	ug/L	5.0 U	10	5.0 UJ	R	5.0 U	5.0 U	5.0 U
4-Chlorophenol	1	10	ug/L	35	30	5.0 UJ	R	5.0 U	5.0 U	5.0 U
Phenol	1	10	ug/L	5.0 U	5.0 U	5.0 UJ	R	5.0 U	5.0 U	5.0 U
Metals										
Arsenic	25	50	ug/L	10.0 U	10.0 U	10.0 U	10.0 U	10.0 U	10.0 U	10.0 U
Mercury	0.7	0.10	ug/L	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U
Pesticides										
alpha-BHC	0.01	10	ug/L	0.050 U	0.25 U	0.050 U	0.050 U	0.11	0.050 U	0.014 J
beta-BHC	0.04	10	ug/L	0.050 U	0.25 U	0.050 U	0.050 U	0.19	0.050 U	0.072
delta-BHC	0.04	10	ug/L	0.12	1.1	0.050 U	0.050 U	0.062	0.050 U	0.050 U
gamma-BHC (Lindane)	0.05	10	ug/L	0.050 U	0.25 U	0.050 U	0.050 U	0.11	0.050 U	0.050 U

Notes:
µg/L Micrograms per liter.
J Estimated concentration.
U Not present at or above the associated value.
UJ Estimated reporting limit.
Exceedance of NYSDEC Class GA GW Criteria and/or Survey Level.

TABLE 2.4

ANALYTICAL RESULTS SUMMARY - 2008
GLENN SPRINGS HOLDINGS, INC.
102nd STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

				Sample Location:	*PCM-10*	
				Sample ID:	*PCM-10-0508*	*PCM-101108*
				Sample Date:	*5/23/2008*	*11/10/2008*
Parameters	*NYSDEC Class GA GW Criteria*	*Survey Level*	*Units*			
Volatile Organic Compounds						
1,2,3-Trichlorobenzene	5	10	ug/L	0.50 U	0.50 U	
1,2,4-Trichlorobenzene	5	10	ug/L	0.50 U	0.50 U	
1,2-Dichlorobenzene	3	10	ug/L	0.50 U	0.50 U	
1,4-Dichlorobenzene	3	10	ug/L	0.50 U	0.50 U	
2-Chlorotoluene	5	5	ug/L	0.50 U	0.50 U	
Benzene	1	5	ug/L	0.50 U	0.50 U	
Chlorobenzene	5	5	ug/L	0.50 U	0.50 U	
Semi-volatile Organic Compounds						
1,2,4,5-Tetrachlorobenzene	5	10	ug/L	5.0 U	5.0 U	
2,4,5-Trichlorophenol	1	50	ug/L	5.0 U	5.0 U	
2,4-Dichlorophenol	1	10	ug/L	5.0 U	5.0 U	
2,5-Dichlorophenol	1	10	ug/L	5.0 U	5.0 U	
2-Chlorophenol	1	10	ug/L	5.0 U	5.0 U	
4-Chlorophenol	1	10	ug/L	5.0 U	5.0 U	
Phenol	1	10	ug/L	5.0 U	5.0 U	
Metals						
Arsenic	25	50	ug/L	10.0 U	10.0 U	
Mercury	0.7	0.10	ug/L	0.20 U	0.20 U	
Pesticides						
alpha-BHC	0.01	10	ug/L	0.019 J	0.064 J	
beta-BHC	0.04	10	ug/L	0.058 U	0.19 J	
delta-BHC	0.04	10	ug/L	0.050 U	0.016 J	
gamma-BHC (Lindane)	0.05	10	ug/L	0.050 U	0.050 UJ	

Notes:
µg/L Micrograms per liter.
J Estimated concentration.
U Not present at or above the associated value.
UJ Estimated reporting limit.
Exceedance of NYSDEC Class GA GW Criteria and/or Survey Level.

TABLE 4.1

NR WELLS CURRENT AND HISTORICAL NAPL RECOVERIES
GLENN SPRINGS HOLDINGS, INC.
102ND STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

	AMOUNT OF NAPL REMOVED IN GALLONS									
YEAR	*1999*	*2001*	*2002*	*2003*	*2004*	*2005*	*2006*	*2007*	*2008*	*Totals*
WELL										
NR-01	-	55	0	60	0	0	30	85	44	**274**
NR-02	-	200	1,490	1,355	12,151	18,153	8,738	9,421	6,189	**57,697**
NR-03	-	40	0	0	0	0	10	42	22	**114**
NR-04	-	0	0	0	0	0	0	0	0	**0**
NR-05	-	40	0	20	0	0	10	36	21	**127**
NR-07	-	0	0	0	0	0	0	0	0	**0**
NR-08	-	0	0	5	0	0	8	43	22	**78**
NR-10	-	0	0	0	0	0	0	0	0	**0**
Total	**--**	**335**	**1,490**	**1,440**	**12,151**	**18,153**	**8,796**	**9,627**	**6,298**	**58,290**

Notes:
* 2006: 4th tanker shipped January 9, 2007 after first of the year.
* 2006: NAPL slightly heavier.
* 2006: Inspection to daily instead of 2x more down time .

APPENDIX A

ANNUAL REPORT FORMS

ANNUAL OPERATION AND MAINTENANCE REPORT
102ND STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

YEAR: **2008**

MONITORING - Water Level Measurements

Month	*Day*	*Inspector*	*PCM-01*	*PZ-01*	*PCM-02*	*PZ-02*	*PCM-03*	*PZ-03*
1st Qtr.	3/28/2008	T. Blackmon	568.42	563.91	567.74	562.57	563.20	562.06
2nd Qtr.	5/5/2008	T. Blackmon	568.24	563.68	567.14	562.44	563.81	561.81
3rd Qtr.	8/20/2008	T. Blackmon	566.69	563.56	566.19	562.64	563.81	562.63
4th Qtr.	12/15/2008	D. Crockett	567.62	563.72	567.56	562.24	563.33	561.65

Month	*Day*	*Inspector*	*PCM-04*	*PZ-04*	*PCM-05*	*PZ-05*	*PCM-06*	*PZ-06*
1st Qtr.	3/28/2008	T. Blackmon	563.33	562.49	564.95	561.96	Dry	Dry
2nd Qtr.	5/5/2008	T. Blackmon	563.94	562.26	564.27	561.82	Dry	Dry
3rd Qtr.	8/20/2008	T. Blackmon	567.37	562.46	563.79	562.21	570.12	564.76
4th Qtr.	12/15/2008	D. Crockett	563.54	562.18	564.93	561.71	Dry	Dry

Month	*Day*	*Inspector*	*PCM-07R*	*PZ-07*	*PCM-08*	*PZ-08*	*PCM-09*	*PZ-09*
1st Qtr.	3/28/2008	T. Blackmon	565.51	566.00	571.03	566.09	572.26	Dry
2nd Qtr.	5/5/2008	T. Blackmon	565.88	566.67	569.60	566.07	570.75	Dry
3rd Qtr.	8/20/2008	T. Blackmon	566.51	566.68	569.76	566.19	570.94	566.58
4th Qtr.	12/15/2008	D. Crockett	565.57	566.36	570.82	Dry	571.80	Dry

Month	*Day*	*Inspector*	*PCM-10*	*PZ-10*
1st Qtr.	3/28/2008	T. Blackmon	568.01	564.89
2nd Qtr.	5/5/2008	T. Blackmon	567.36	565.02
3rd Qtr.	8/20/2008	T. Blackmon	566.36	564.94
4th Qtr.	12/15/2008	D. Crockett	568.15	564.92

FORM 1

ANNUAL OPERATION AND MAINTENANCE REPORT
102ND STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

YEAR: **2008**

GROUNDWATER - Quality Monitoring

Quarter	*Date Sample Taken*	*Inspector*	*Comments*
1st		T. Blackmon	
2nd	5/21,22,23,27/08	T. Blackmon	Semiannual sampling event.
3rd		T. Blackmon	
4th	11/10-11/08	D. Crockett	Semiannual sampling event.

Results of analyses are attached.

NAPL PRESENCE - Monitoring

			NR-01		*NR-02*		*NR-03*	
	Date	*Inspector*	*Depth of NAPL (ft)*	*Gallons Removed*	*Depth of NAPL (ft)*	*Gallons Removed*	*Depth of NAPL (ft)*	*Gallons Removed*
1st Quarter	3/28/2008	T. Blackmon	2.79	23	0.47	3636	0.13	14
2nd Quarter	5/5/2008	T. Blackmon	2.39	21	0.40	2553	0.23	8
3rd Quarter	8/20/2008	T. Blackmon	2.50	0	0.4	0	0.23	0
4th Quarter	12/15/2008	D. Tyran	4.10	0	0.50	0	1.70	0

			NR-04		*NR-05*		*NR-07*	
	Date	*Inspector*	*Depth of NAPL (ft)*	*Gallons Removed*	*Depth of NAPL (ft)*	*Gallons Removed*	*Depth of NAPL (ft)*	*Gallons Removed*
1st Quarter	3/28/2008	T. Blackmon	NO NAPL		2.65	10	NO NAPL	
2nd Quarter	5/5/2008	T. Blackmon	NO NAPL		2.15	11	NO NAPL	
3rd Quarter	8/20/2008	T. Blackmon	NO NAPL		1.21	0	NO NAPL	
4th Quarter	12/15/2008	D. Tyran	NO NAPL		2.63	0	NO NAPL	

			NR-08		*NR-10*	
	Date	*Inspector*	*Depth of NAPL (ft)*	*Gallons Removed*	*Depth of NAPL (ft)*	*Gallons Removed*
1st Quarter	3/28/2008	T. Blackmon	2.18	12	NO NAPL	
2nd Quarter	5/5/2008	T. Blackmon	2.36	10	NO NAPL	
3rd Quarter	8/20/2008	T. Blackmon	2.21	0	NO NAPL	
4th Quarter	12/15/2008	D. Tyran	1.50	0	NO NAPL	

FORM 1

ANNUAL OPERATION AND MAINTENANCE REPORT
102ND STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

YEAR: 2008

OPERATION

APL COLLECTION AND DISCHARGE SYSTEM

APL Flow for Previous Year (gallons)	*APL Flow for Current Year (gallons)*
300,074	289,738

NAPL REMOVAL SYSTEM

	NAPL Removed for Previous Year (gallons)	*NAPL Removed for Current Year (gallons)*
NR-01	85	44
NR-02	9421	6189
NR-03	42	22
NR-04	0	0
NR-05	36	21
NR-07	0	0
NR-08	43	22
NR-10	0	0
Total	9627	6298

Where was NAPL treated/disposed?

Facility	Clean Harbors , Deer Park, Texas	Date	2/11/08
Facility	Clean Harbors , Deer Park, Texas	Date	4/14/08
Facility	Clean Harbors , Deer Park, Texas	Date	7/09/08
Facility	Clean Harbors , Deer Park, Texas	Date	10/07/08
Facility		Date	
Facility		Date	

FORM 1

ANNUAL OPERATION AND MAINTENANCE REPORT
102ND STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

YEAR: 2008

INSPECTION AND MAINTENANCE

Scheduled inspections performed:

	Date	*Inspectors*
May	28	Jeff Konsella, NYSDEC; Brian Sadowski, NYSDEC; Scott Parkhill, MSRM; and Brian Downie, MSRM.

Was maintenance required?

	Yes	*No*
May	X	

What maintenance was required?	Date Performed
Clean out of drifted wood and debris along shoreline and near grating at storm sewer outlet in warmer weather.	*Summer 2008
Repair section along Buffalo Avenue near 102nd Street that has heaved. Inquiry will be made to vendor about alternate methods of securing fencing in the area.	*Summer 2008
Fill larger burrow holes as needed.	*As needed

Describe any maintenance activity that required an activity specific work plan and health and safety plan.

At this time no other concerns or issues conveyed.

Form Completed By:

Clint Babcock, GSH PM — NAME

Clinton J Babcock — SIGNATURE

May 29, 2009 — DATE

FORM 1

ANNUAL OPERATION AND MAINTENANCE REPORT
102ND STREET LANDFILL SITE
NIAGARA FALLS, NEW YORK

YEAR: 2008

Send completed copies of this form to the following for review:

Clint J. Babcock
Glenn Springs Holdings, Inc.
5005 LBJ Freeway, Suite 1350
Dallas, TX 75244-6119

and

Michael J. Bellotti
Olin Chemical Group
3855 North Ocoee Street, Suite 200
Cleveland, TN 37312

After review is complete, send 5 copies to the following:

Chief-New York Remedial Branch
Emergency and Remedial Response Davison
U.S. Environmental Protection Agency - Region II
290 Broadway, 20th Floor
New York, NY 10007-1866
Attn: 102nd Street Landfill Superfund Site Manager

and

Mr. Gerald Rider
Chief, Section D
New York State Dept. of Environmental Conservation
625 Broadway
8th Floor
Albany, NY 12233-7252

and

Mr. Gregory P. Sutton
Regional Remediation Engineer
New York State Dept. of Environmental Conservation
270 Michigan Avenue
Buffalo, NY 14203-2999

FORM 1

APPENDIX B

SUMMARY OF WATER LEVEL ELEVATIONS 2002 - 2008

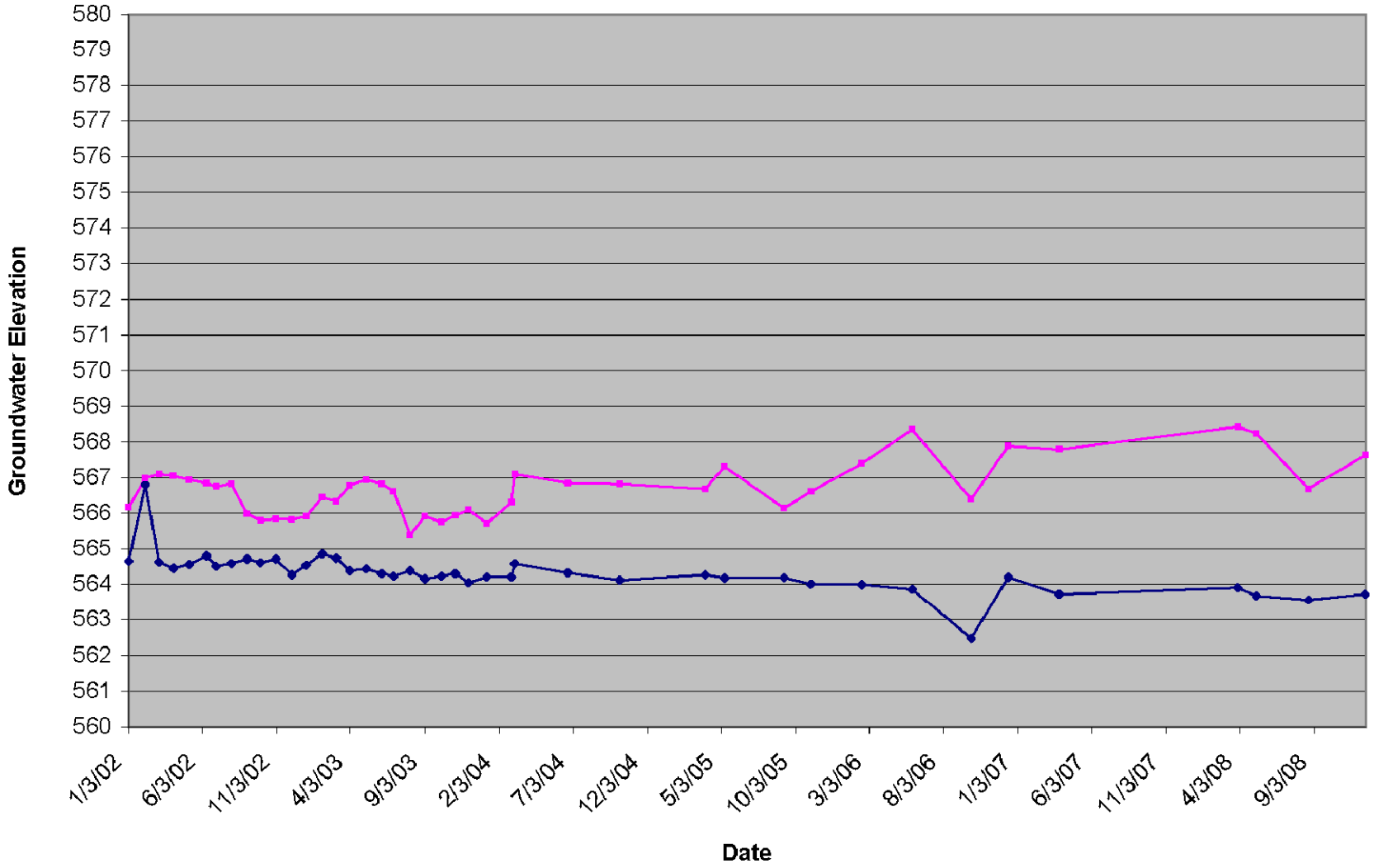


figure B.1

GROUNDWATER LEVELS WELL PAIR 1
2008 ANNUAL REPORT
102ND STREET LANDFILL SITE
GLENN SPRINGS HOLDINGS, INC.
Niagara Falls, New York

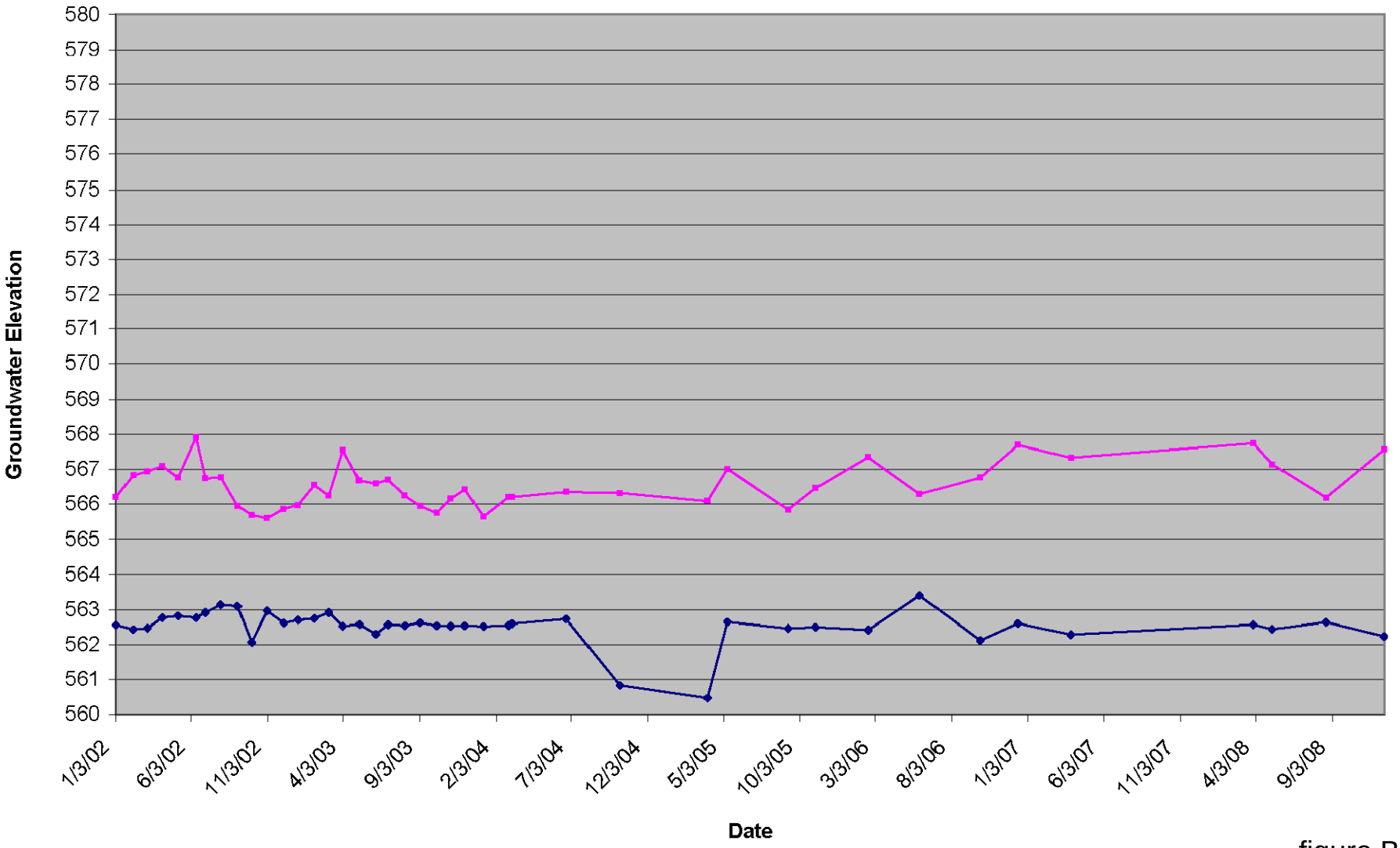


figure B.2

GROUNDWATER LEVELS WELL PAIR 2
2008 ANNUAL REPORT
102ND STREET LANDFILL SITE
GLENN SPRINGS HOLDINGS, INC.
Niagara Falls, New York

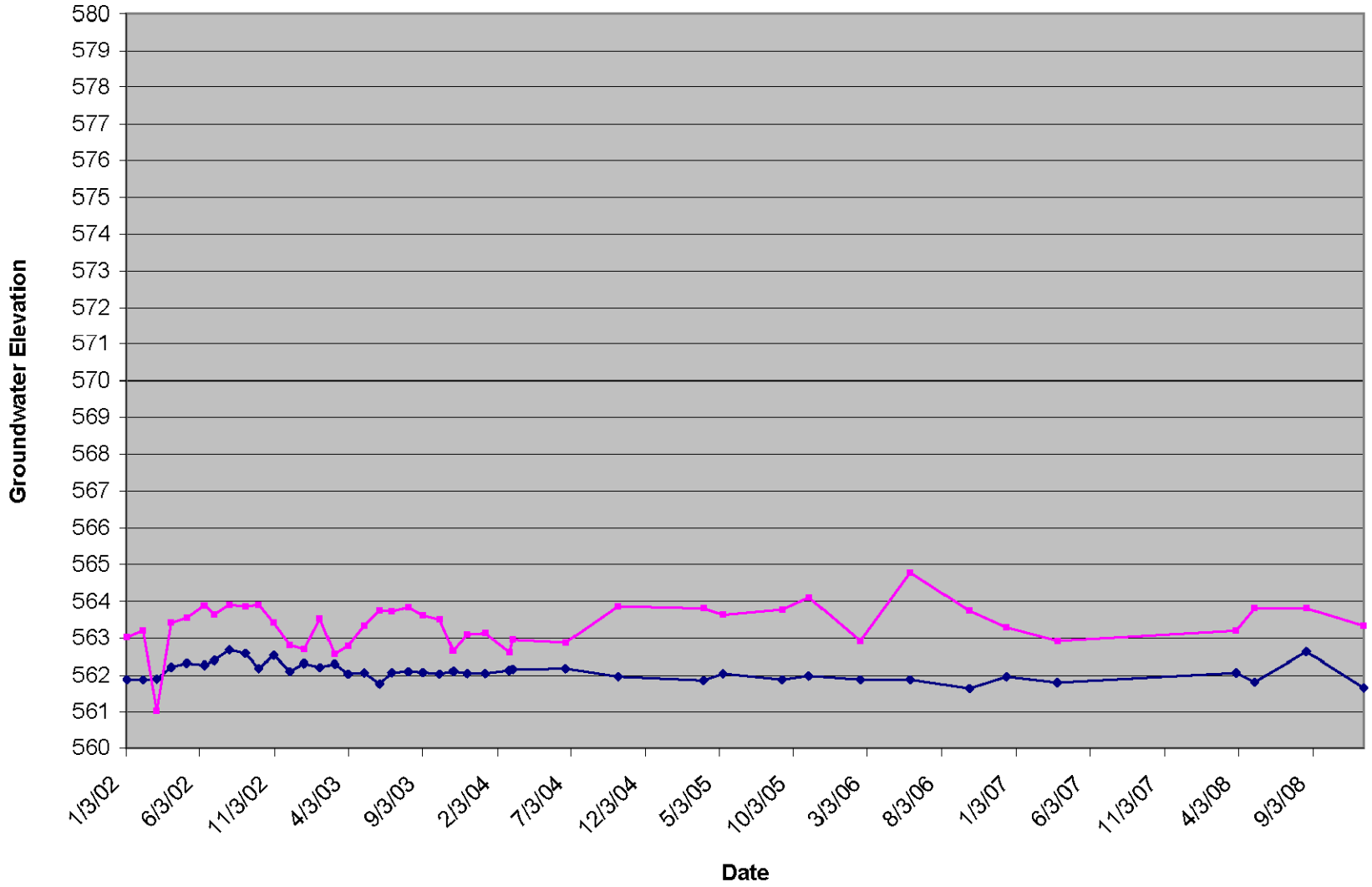


figure B.3

GROUNDWATER LEVELS WELL PAIR 3
2008 ANNUAL REPORT
102ND STREET LANDFILL SITE
GLENN SPRINGS HOLDINGS, INC.
Niagara Falls, New York

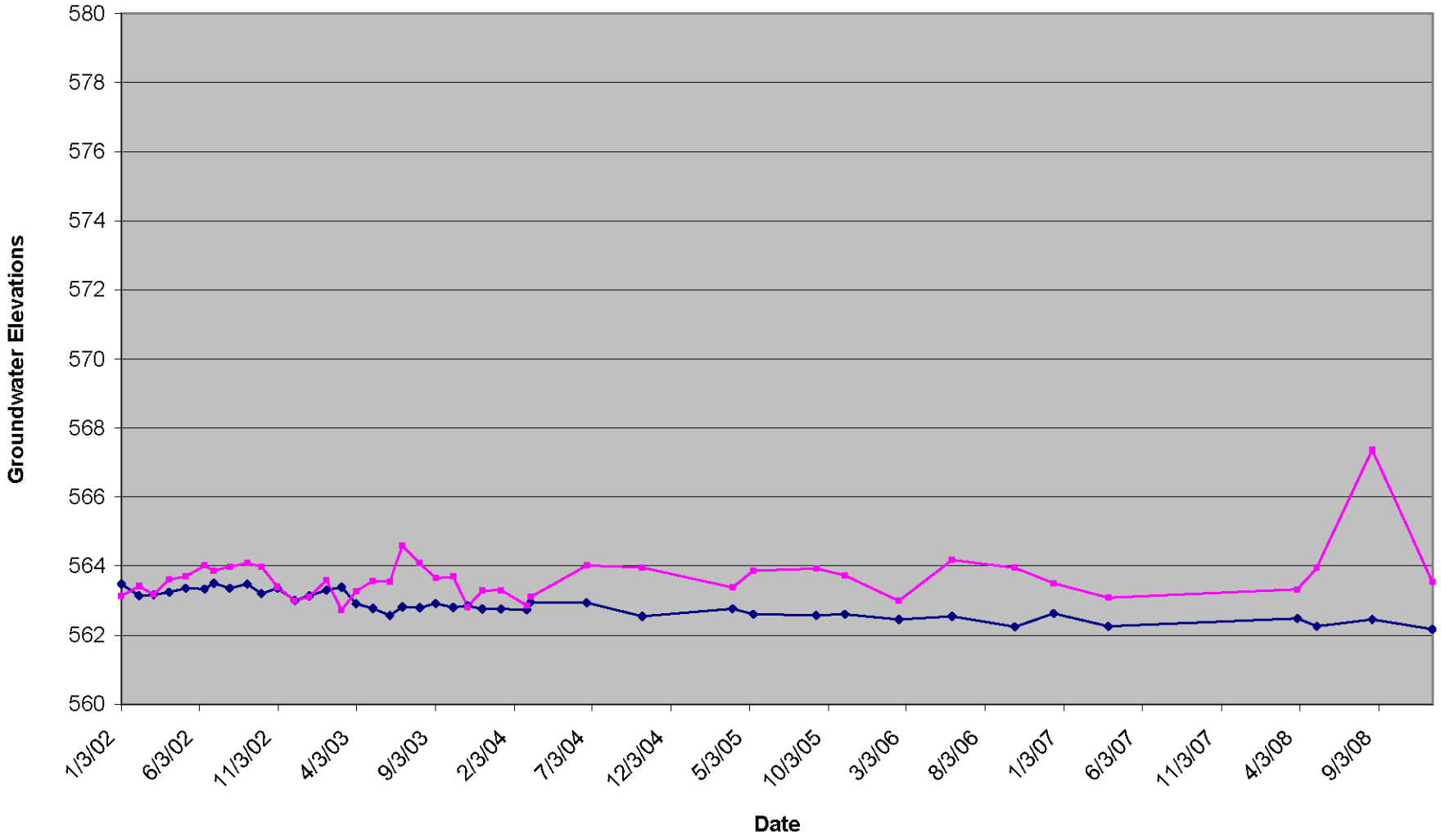


figure B.4

GROUNDWATER LEVELS WELL PAIR 4
2008 ANNUAL REPORT
102ND STREET LANDFILL SITE
GLENN SPRINGS HOLDINGS, INC.
Niagara Falls, New York

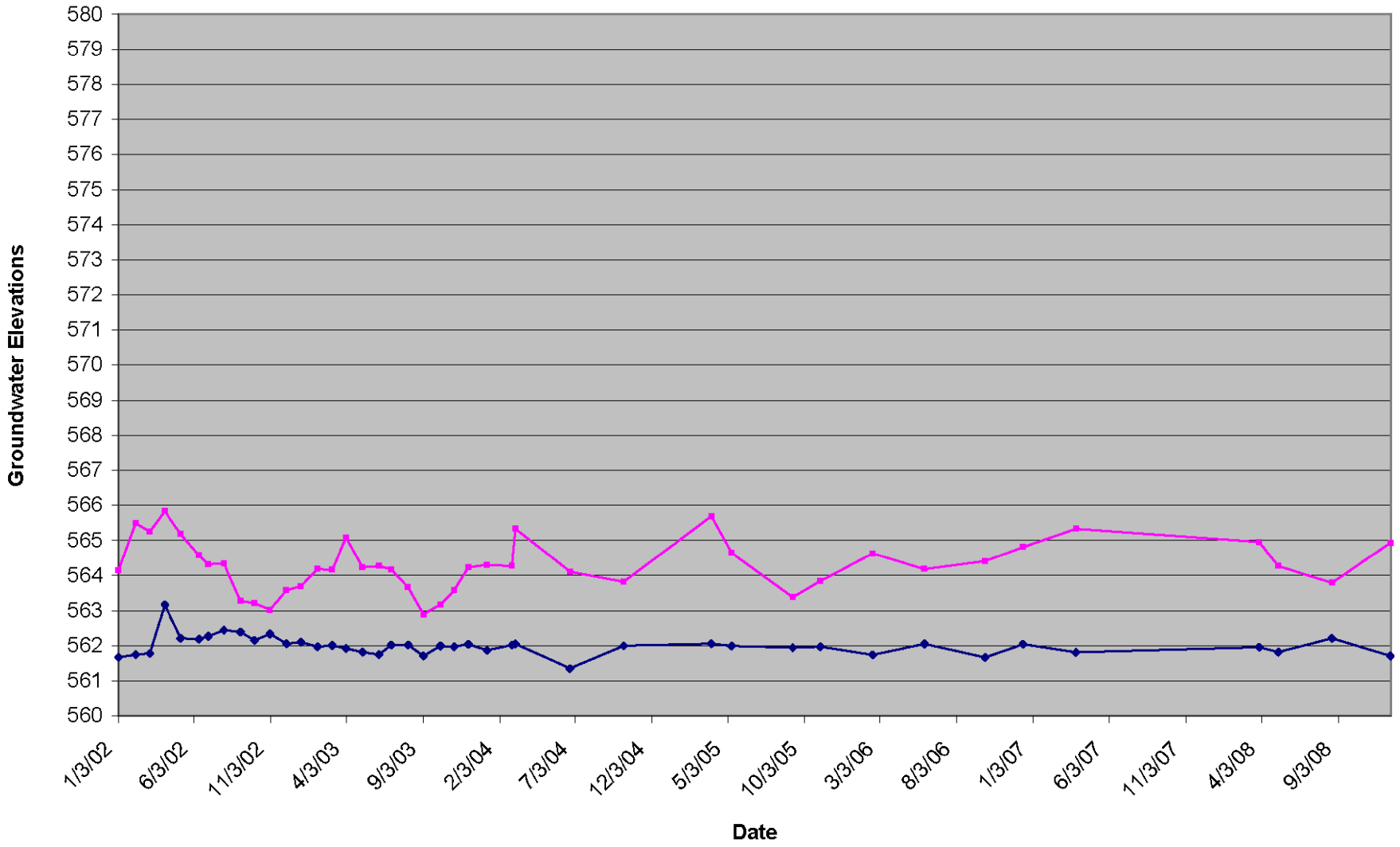


figure B.5

GROUNDWATER LEVELS WELL PAIR 5
2008 ANNUAL REPORT
102ND STREET LANDFILL SITE
GLENN SPRINGS HOLDINGS, INC.
Niagara Falls, New York

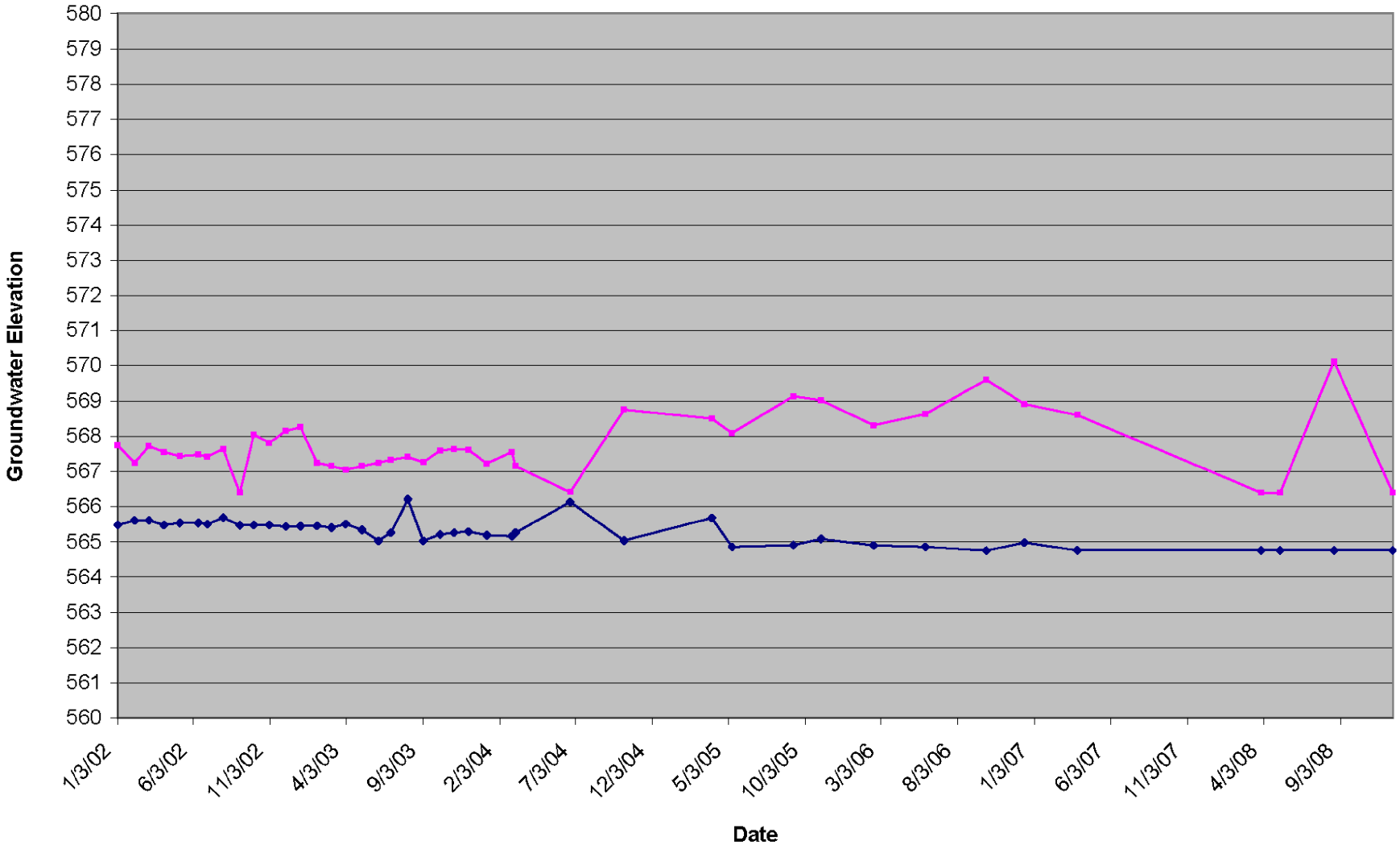
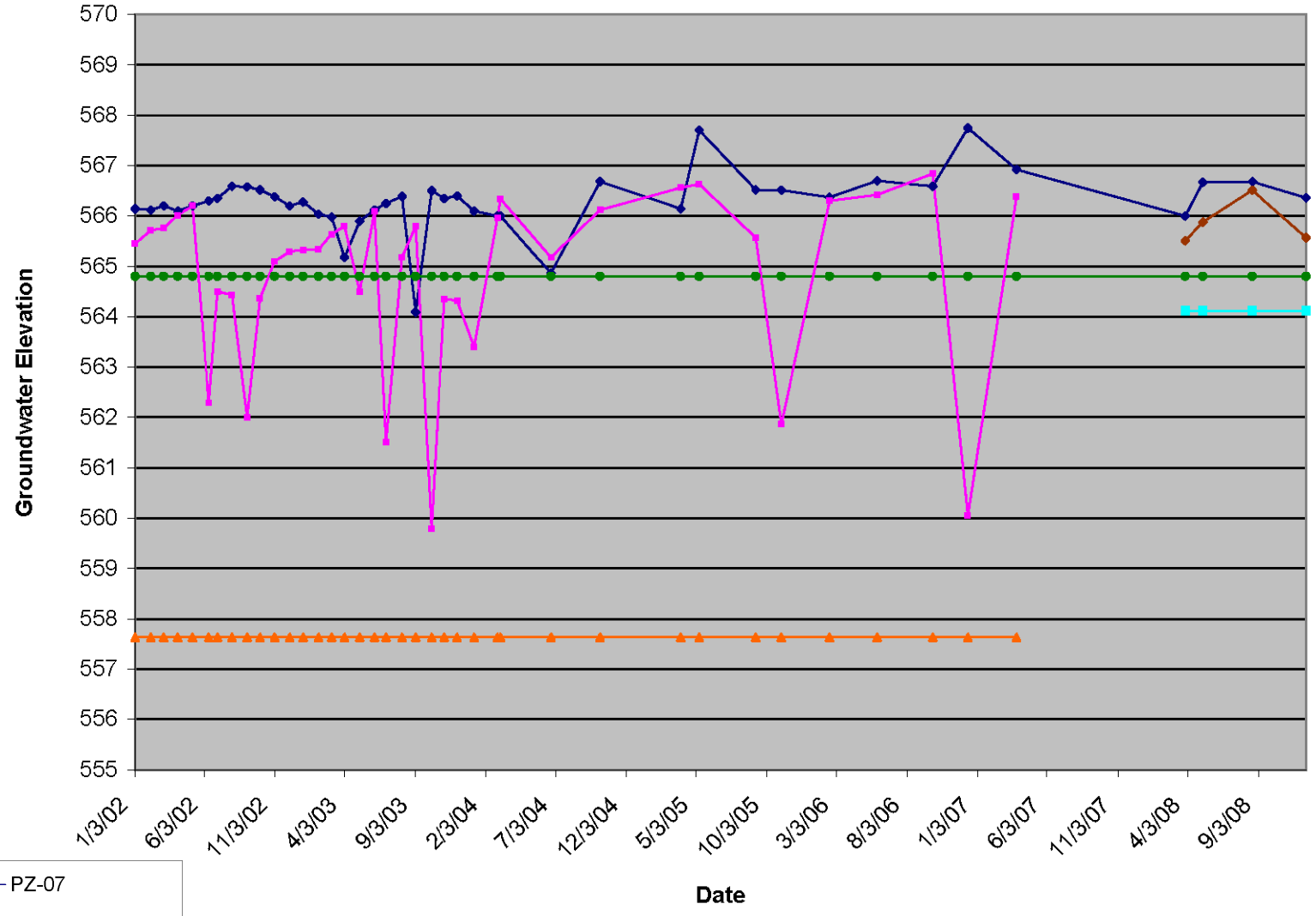


figure B.6

GROUNDWATER LEVELS WELL PAIR 6
2008 ANNUAL REPORT
102ND STREET LANDFILL SITE
GLENN SPRINGS HOLDINGS, INC.
Niagara Falls, New York



Note: PCM-07R was installed in October 2007 to replace well PCM-07.

figure B.7

GROUNDWATER LEVELS WELL PAIR 7
2008 ANNUAL REPORT
102ND STREET LANDFILL SITE
GLENN SPRINGS HOLDINGS, INC.
Niagara Falls, New York

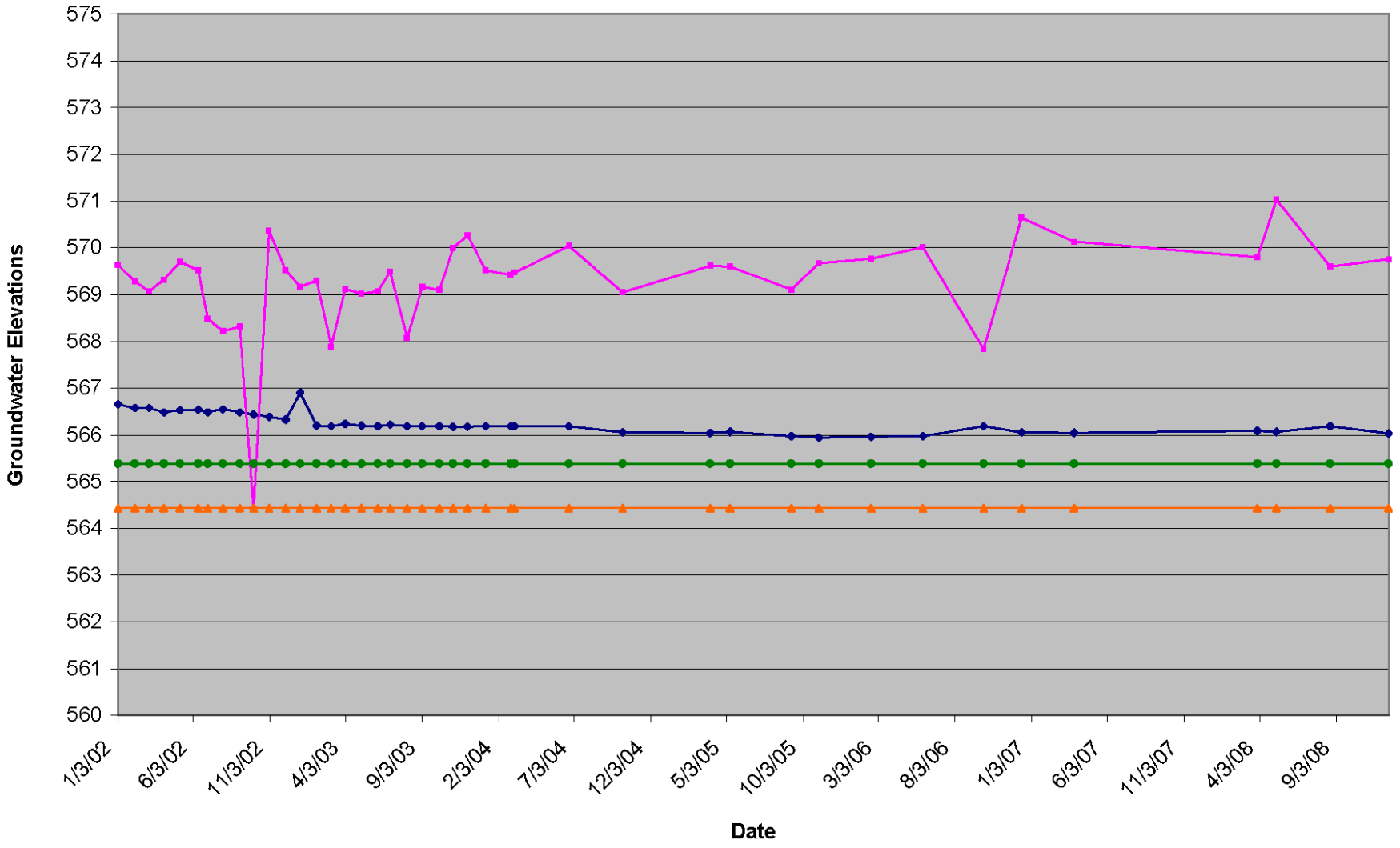


figure B.8

GROUNDWATER LEVELS WELL PAIR 8
2008 ANNUAL REPORT
102ND STREET LANDFILL SITE
GLENN SPRINGS HOLDINGS, INC.
Niagara Falls, New York

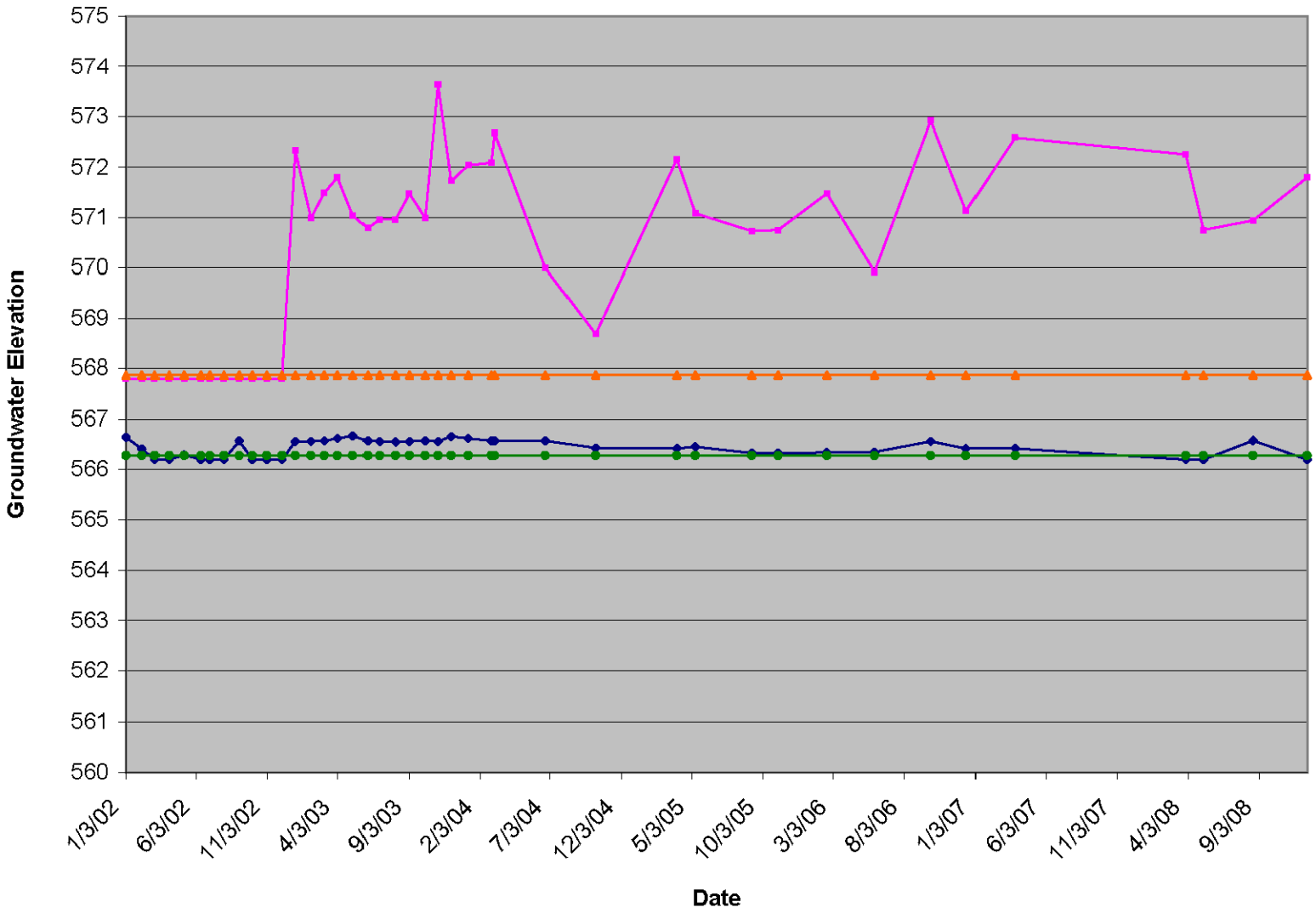


figure B.9

GROUNDWATER LEVELS WELL PAIR 9
2008 ANNUAL REPORT
102ND STREET LANDFILL SITE
GLENN SPRINGS HOLDINGS, INC.
Niagara Falls, New York

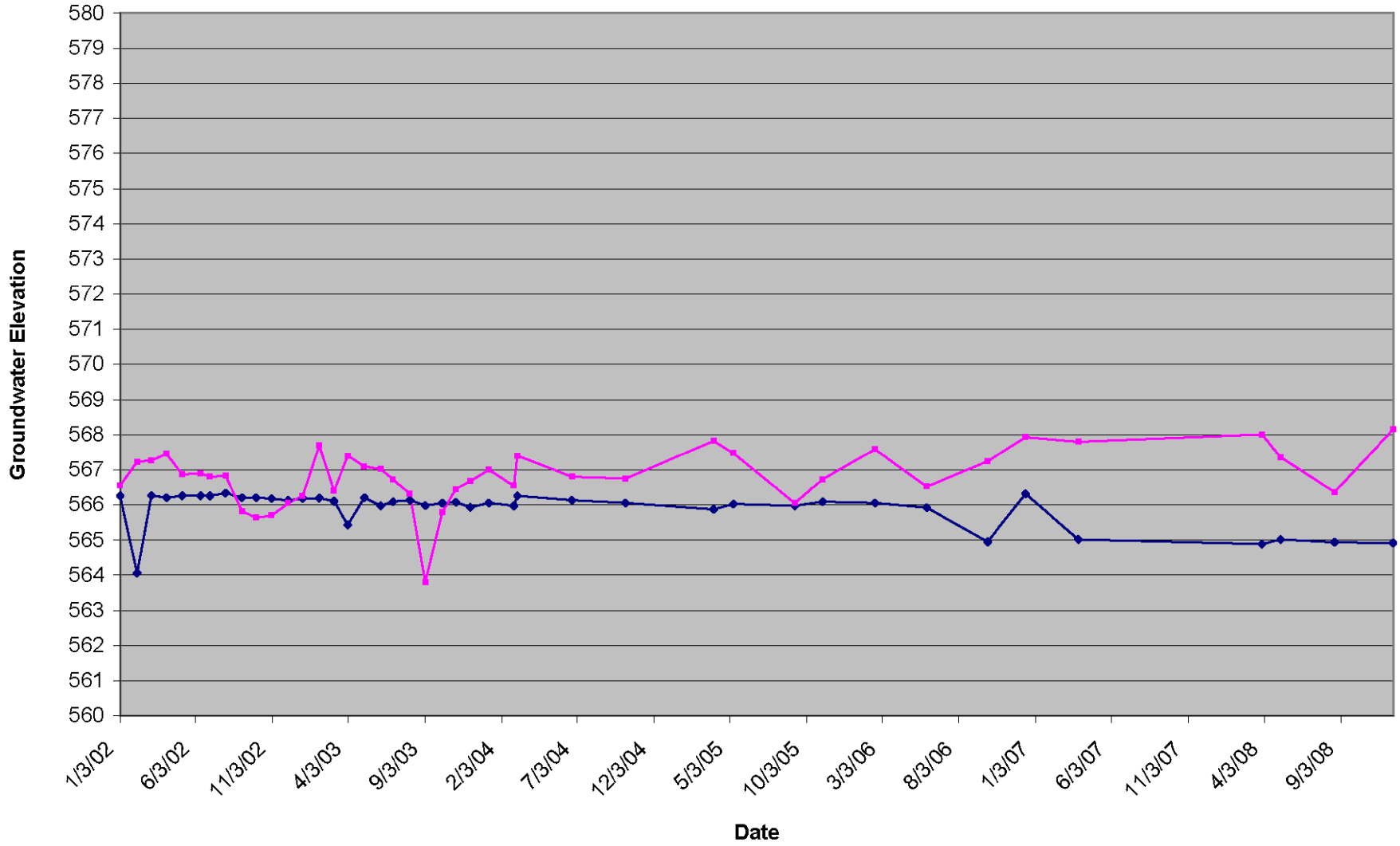


figure B.10

GROUNDWATER LEVELS WELL PAIR 10
2008 ANNUAL REPORT
102ND STREET LANDFILL SITE
GLENN SPRINGS HOLDINGS, INC.
Niagara Falls, New York

APPENDIX C

CONCENTRATION TREND GRAPHS

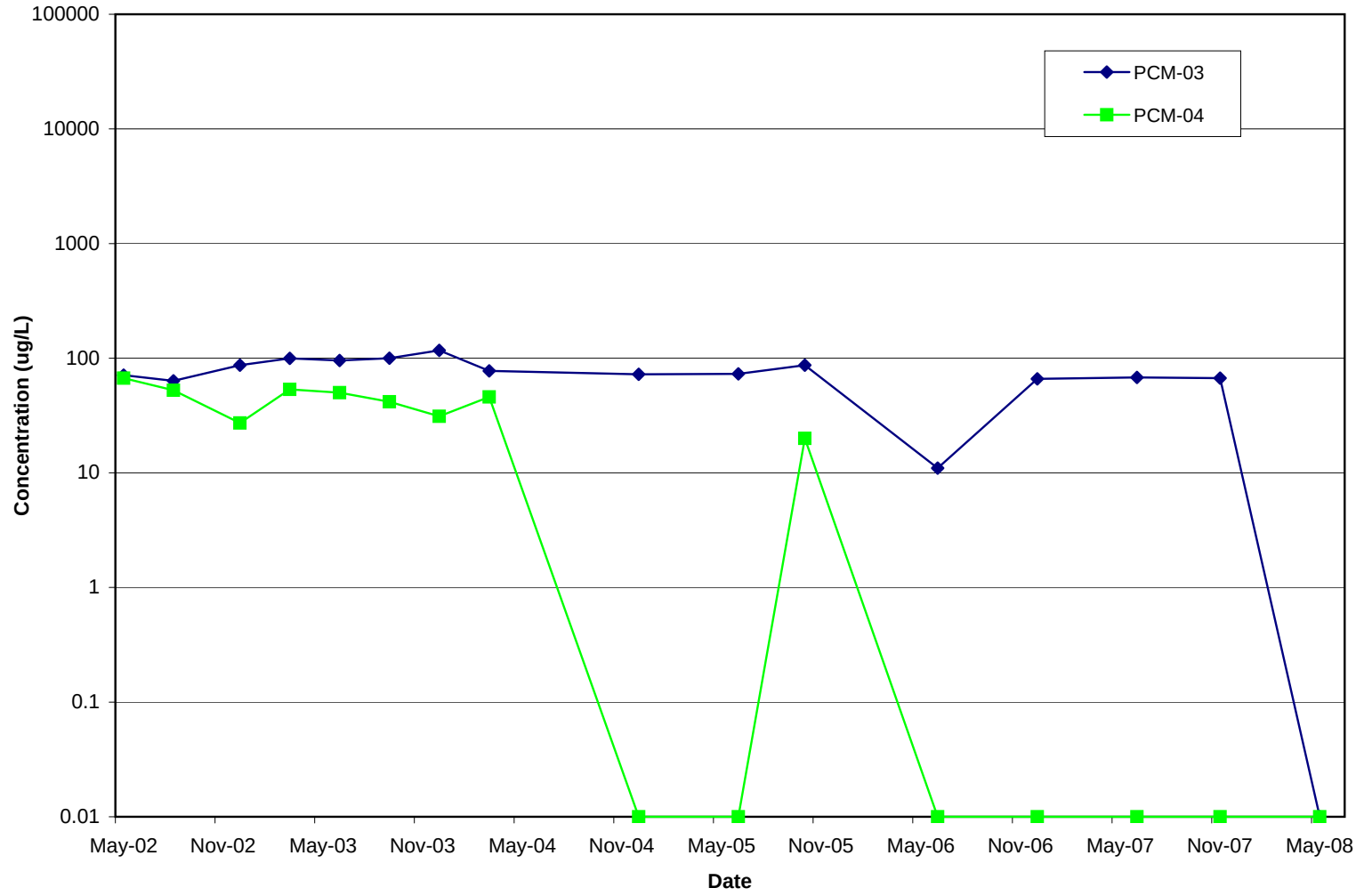


figure 1
CONCENTRATION OF 1,2-DICHLOROBENZENE vs. TIME
102ND STREET LANDFILL

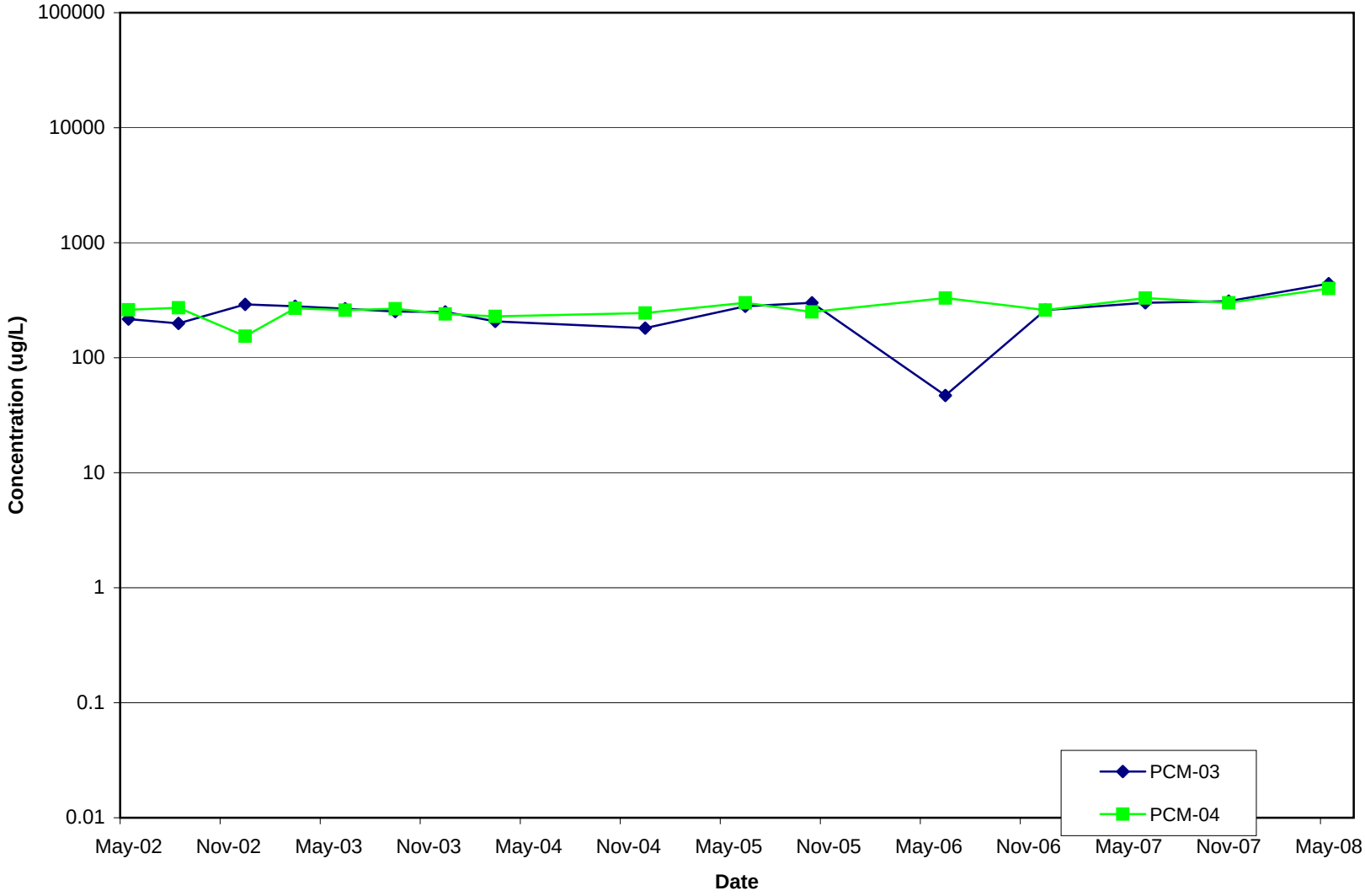


figure 2
CONCENTRATION OF 1,4-DICHLOROBENZENE vs. TIME
102ND STREET LANDFILL

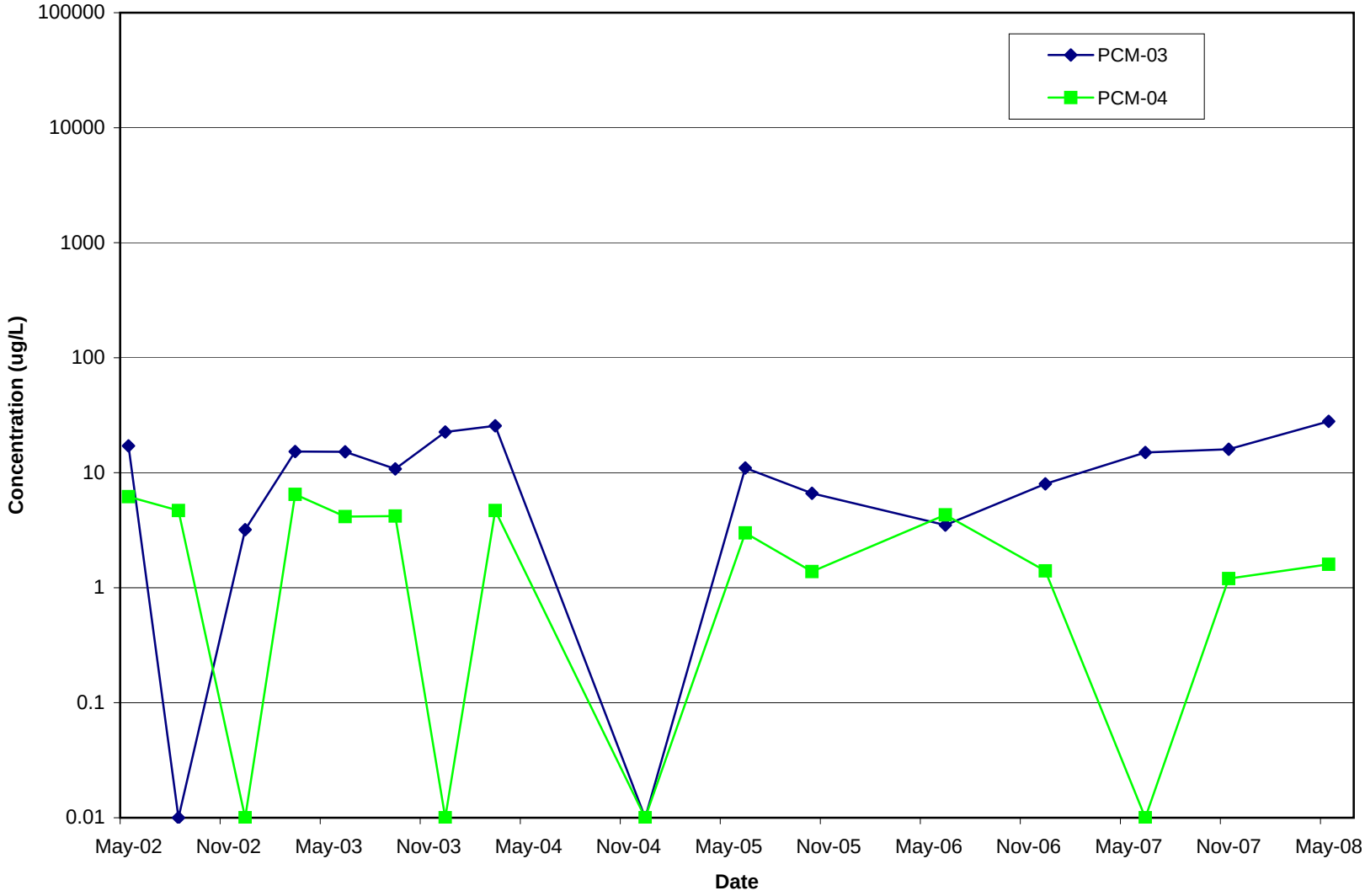


figure 3
CONCENTRATION OF 2,4-DICHLOROPHENOL vs. TIME
102ND STREET LANDFILL

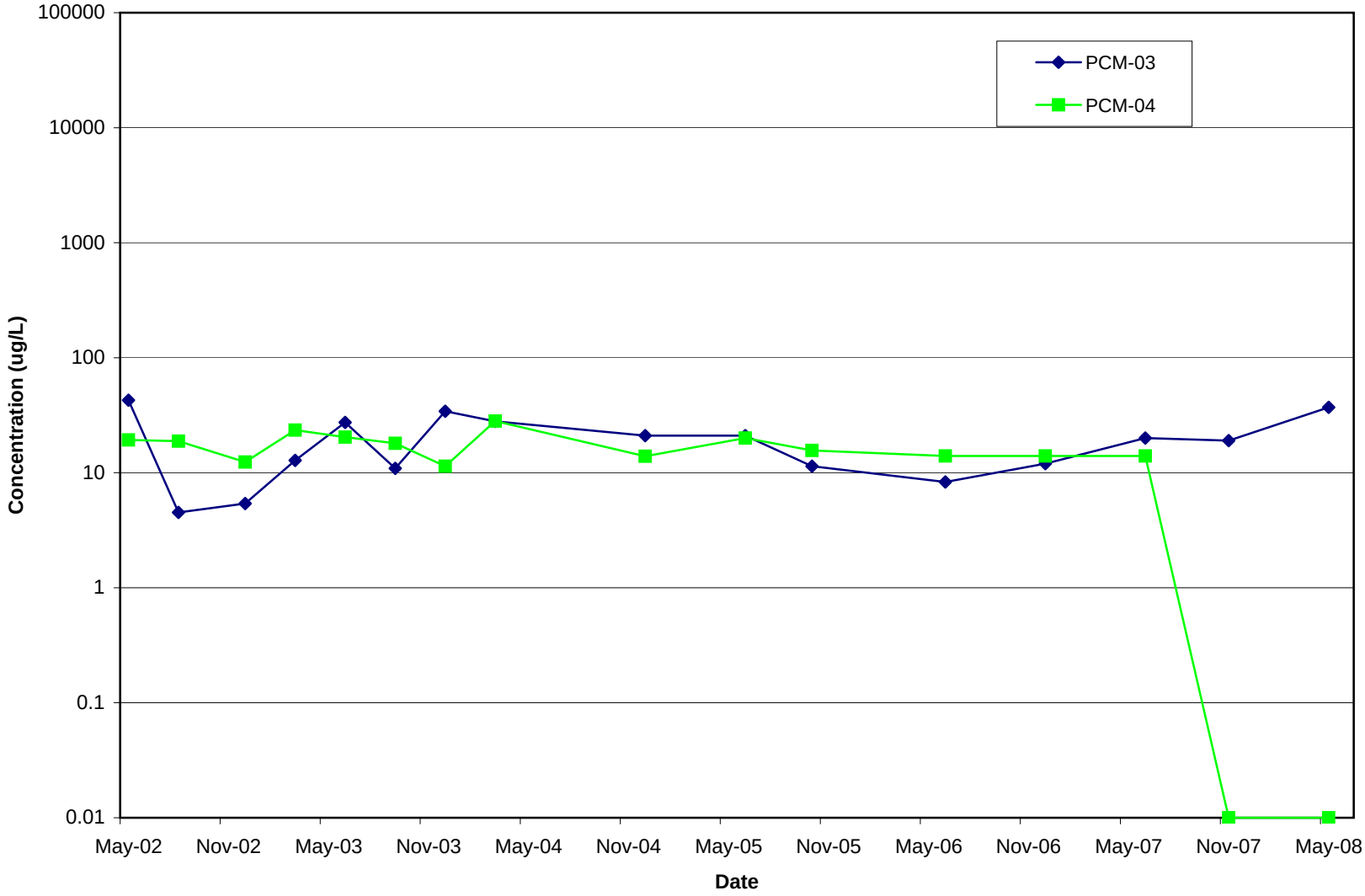


figure 4
CONCENTRATION OF 2-CHLOROPHENOL vs. TIME
102ND STREET LANDFILL

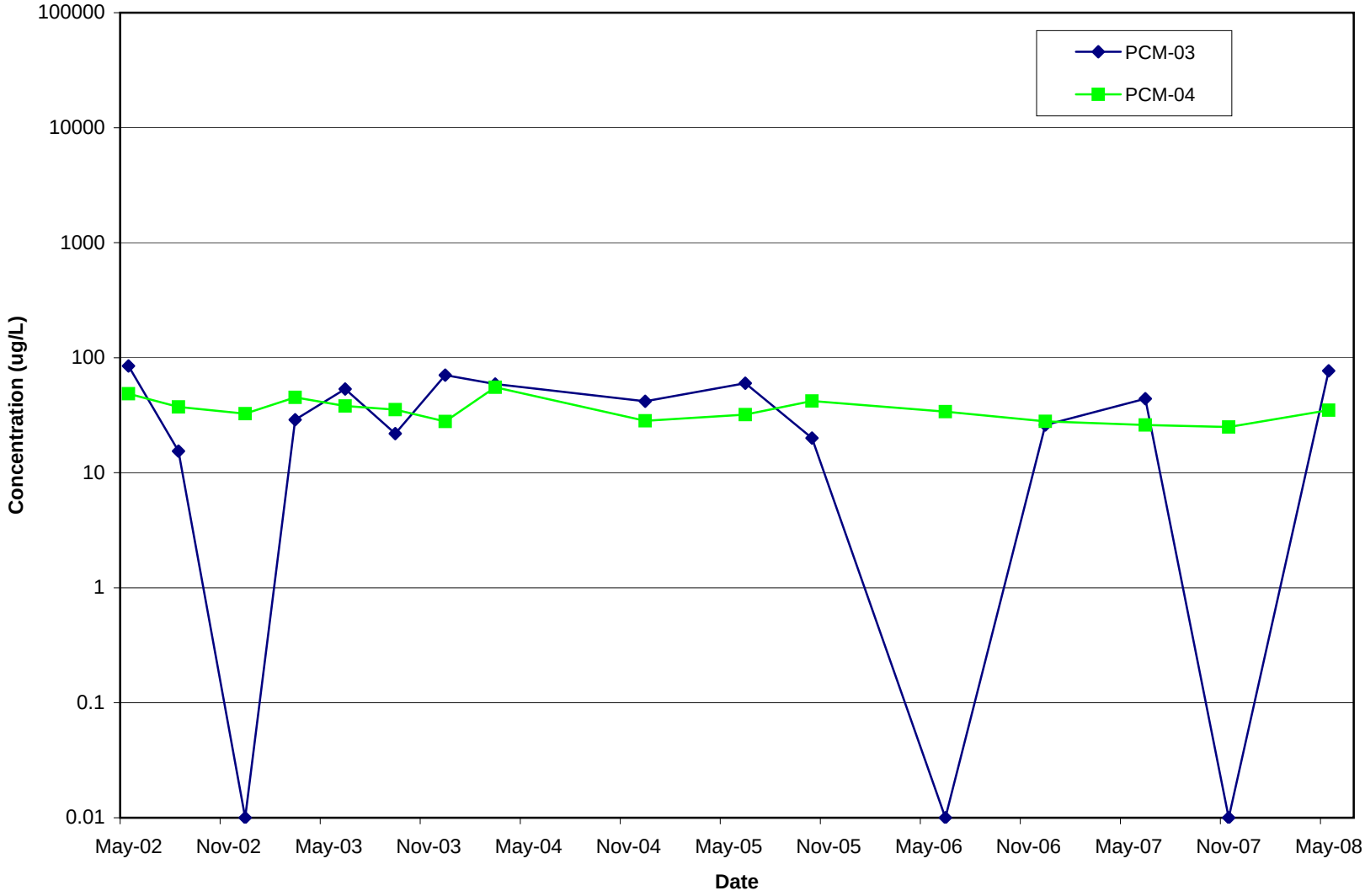


figure 5
CONCENTRATION OF 4-CHLOROPHENOL vs. TIME
102ND STREET LANDFILL

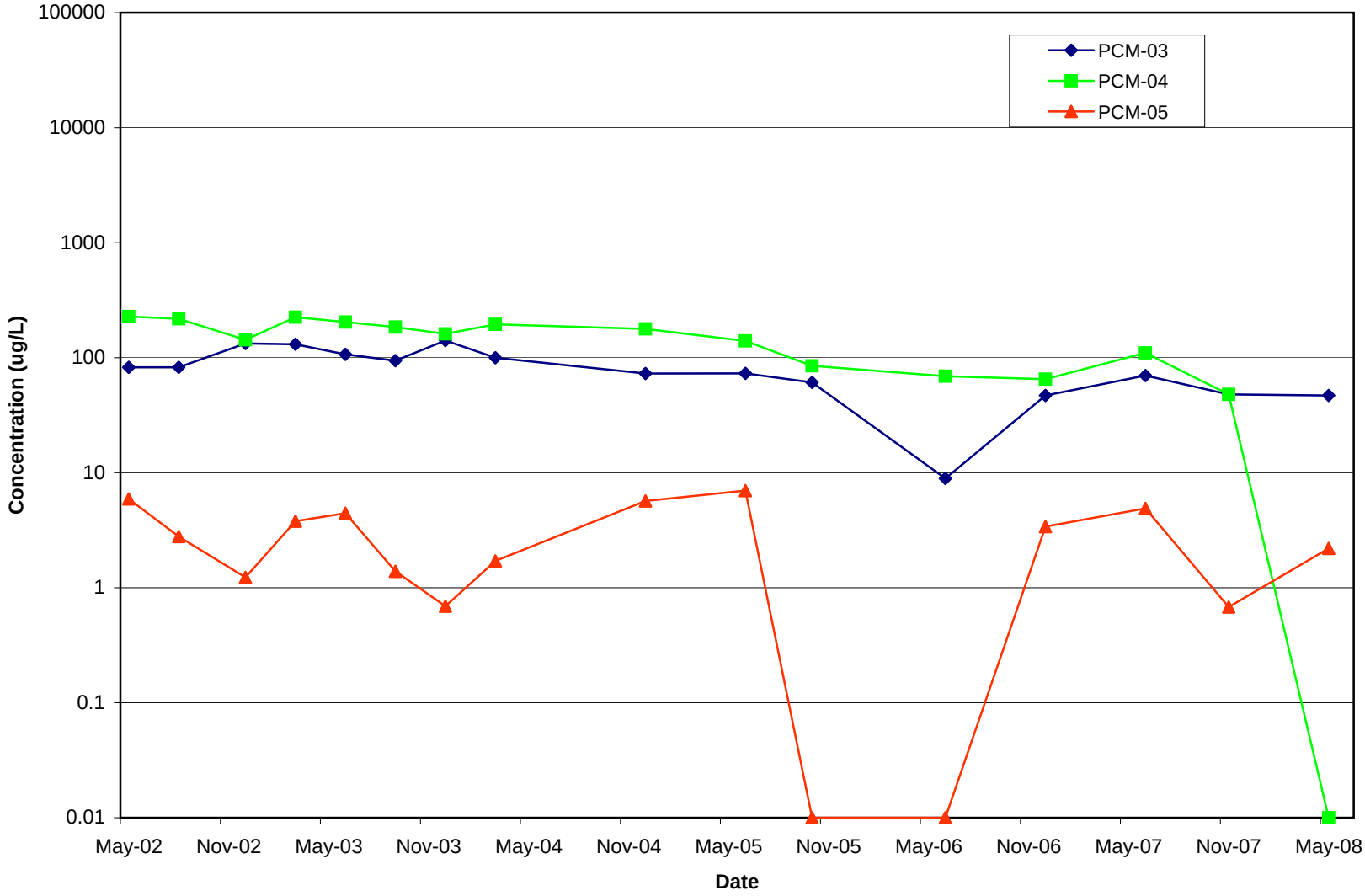


figure 6
CONCENTRATION OF BENZENE vs. TIME
102ND STREET LANDFILL

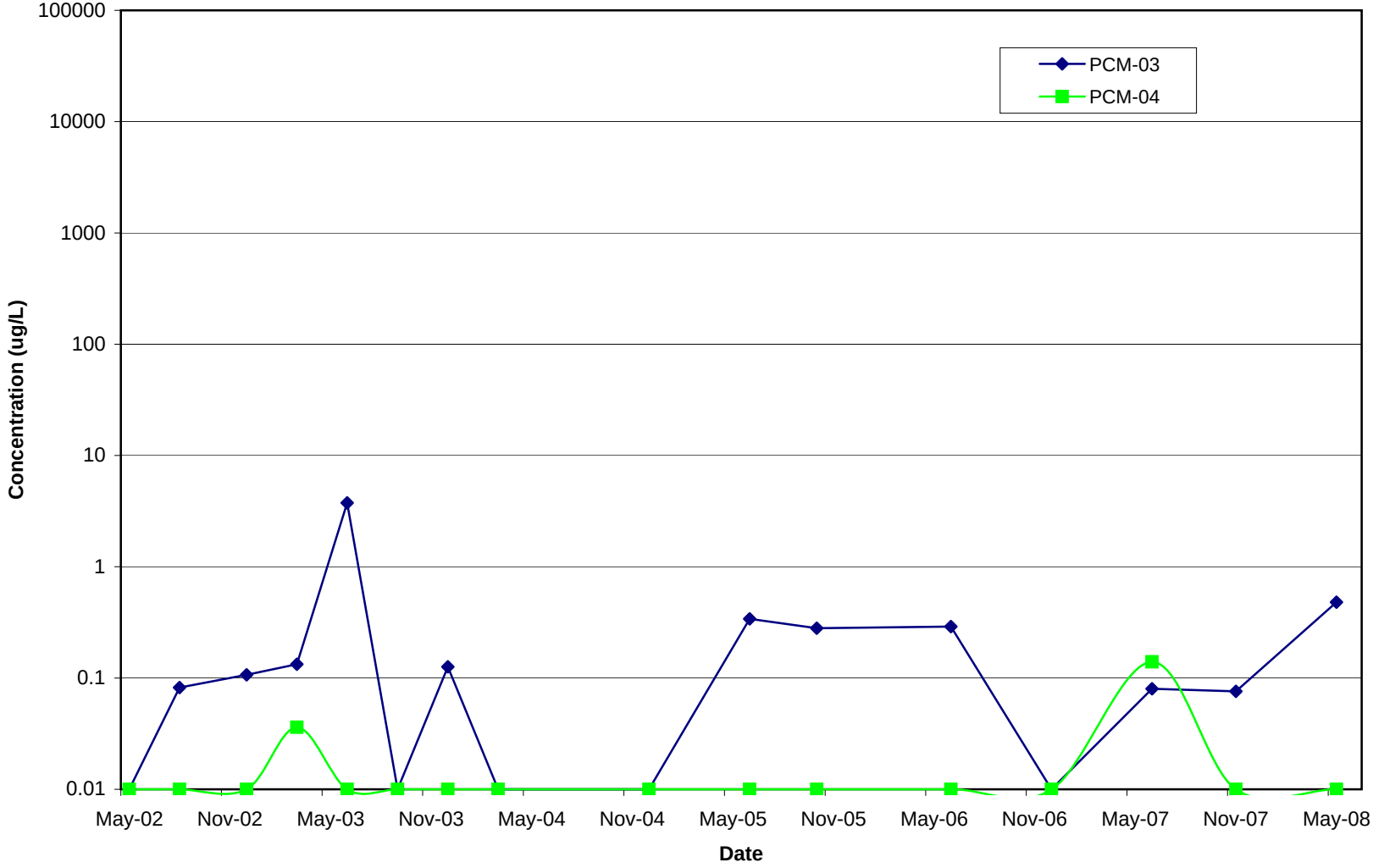


figure 7
CONCENTRATION OF BETA-BHC vs. TIME
102ND STREET LANDFILL

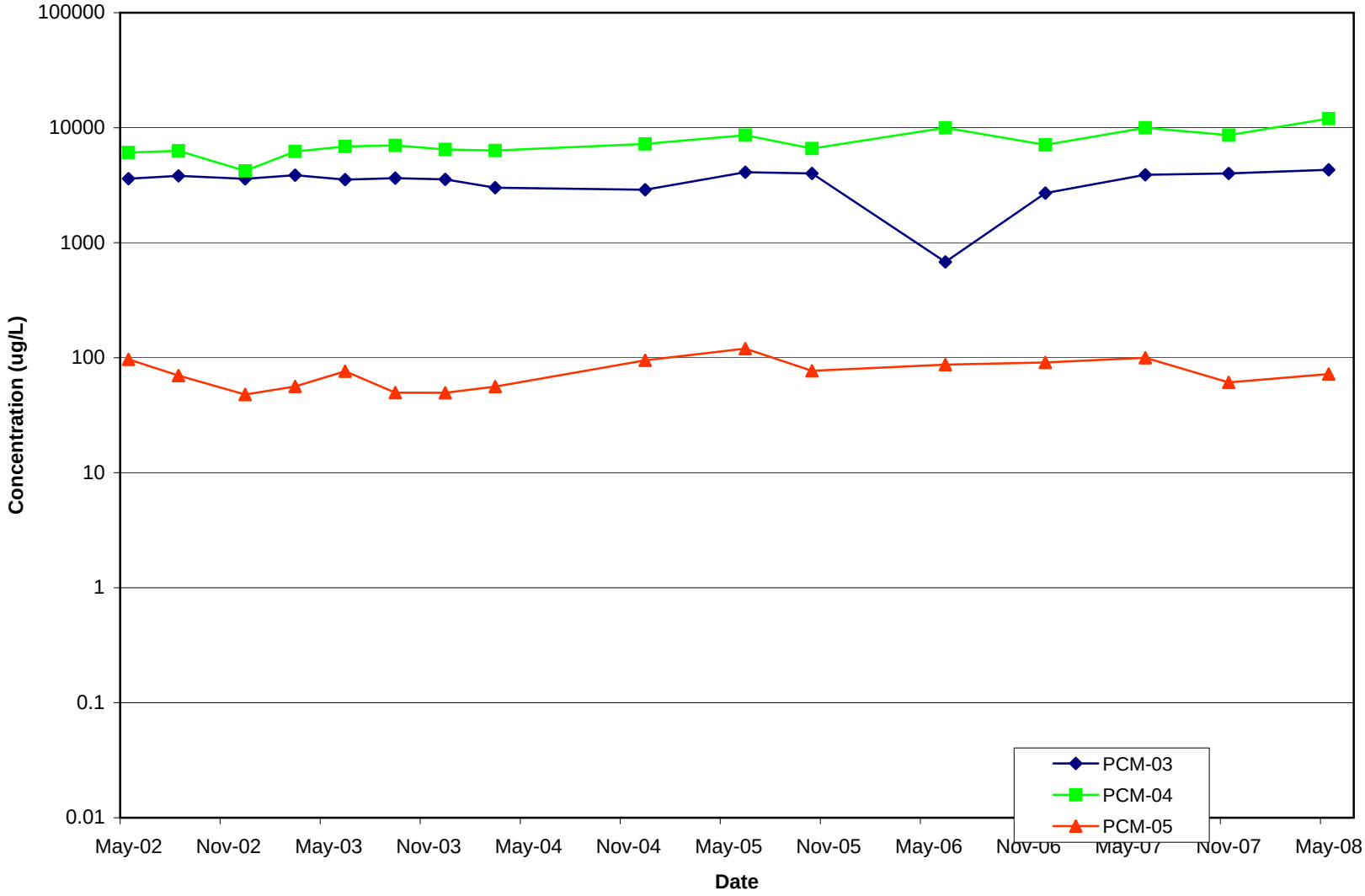


figure 8
CONCENTRATION OF CHLOROBENZENE vs. TIME
102ND STREET LANDFILL

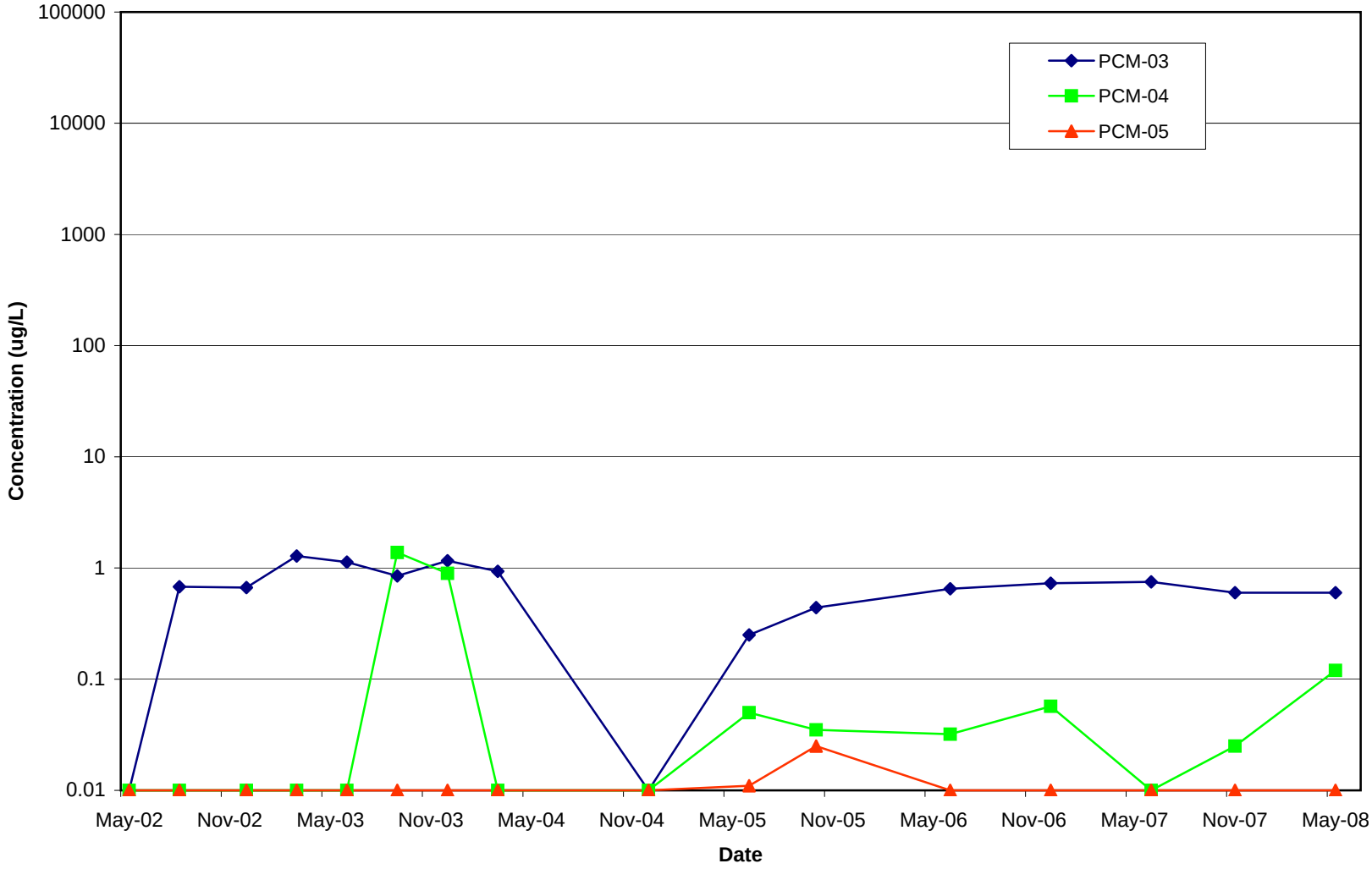


figure 9
CONCENTRATION OF DELTA-BHC vs. TIME
102ND STREET LANDFILL

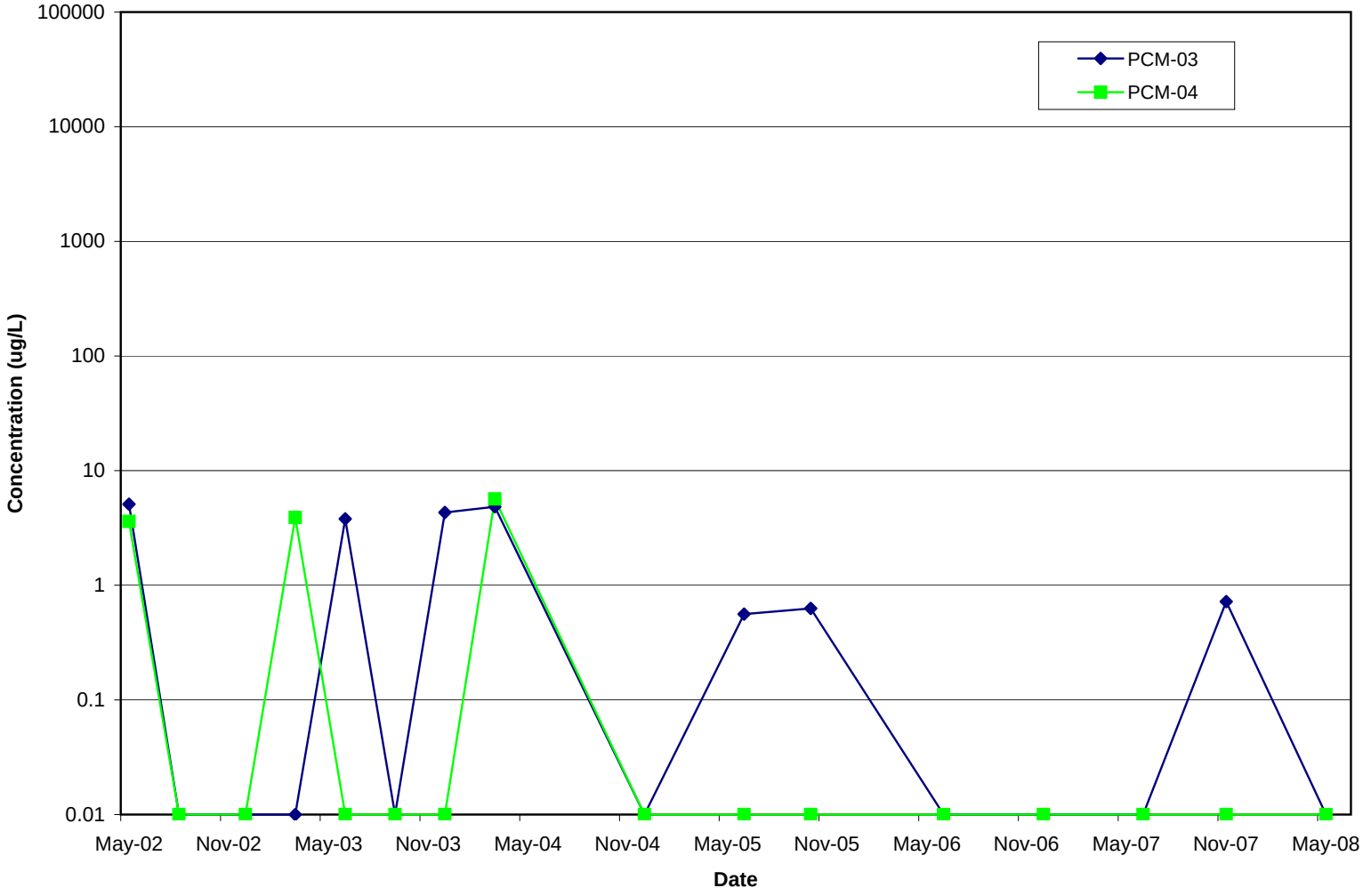


figure 10
CONCENTRATION OF PHENOL vs. TIME
102ND STREET LANDFILL