NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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DAILY INSPECTION REPORT

Facility: Vanchlor Company, Inc. (Vanchlor) Landfill

600 Mill Street, City of Lockport, Niagara County, NY 14094

DEC Site # 932039

EPA ID - NYD991290529

Date: December 19, 2018 (11:30 – 13:00)

Personnel: Steven Moeller (NYSDEC PM); Brian Law (Vanchlor - Operations Manager); Chris Banach (VanDeMark Chemical Inc. - EHSQS Manager)

Weather: Partly cloudy, 35° F, calm

Background: The site rests remotely along the top of the Niagara Escarpment and consists of a 2.5-acre landfill portion of a 5-acre parcel that was used to dispose of process wastes from the VanDeMark Chemical facility from 1957 until 1982. The site is bounded by Mill Street to the north, a Somerset Railroad Corp rail corridor to the south and east, and Plank Road to the west. Eighteen Mile Creek is located to the south and west and ~100 feet vertically below the site at the base of the Escarpment. Wooded areas surround the capped, grassy landfill. The VanDeMark plant facility is approximately 1/4 mile to the east-southeast and the Vanchlor plant facility is located just to the southeast of the landfill.

In 1988, the landfill was closed in accordance with a NYSDEC-approved Closure Plan that included the installation of a final cover system consisting of two feet of compacted clay overlain by a drainage layer of sand and loam soil and planted with a vegetative cover. Groundwater beneath the site has been impacted by chlorinated VOCs and metals. In 1999, VanDeMark Chemical sold the property to Vanchlor. Following expiration of the Post-Closure RCRA Permit in September 2013, Vanchlor entered into an Order on Consent with NYSDEC (executed July 10, 2014) that required development of a Site Management Plan (SMP). The SMP requires landfill inspections and maintenance, groundwater quality monitoring, and submittal of an annual Periodic Review Report (PRR) with an Institutional and Engineering Control (ICEC) certification.

Work Performed: Initial Site Visit for New NYSDEC PM (Steven Moeller)

A Site Visit was performed by the personnel noted above. A locked access gate is present on the northern portion of Mill Street near its intersection with Plank Road. Another locked access gate is present at the northern end of the closed landfill. The



inspection began at the northern landfill gate and proceeded in a counterclockwise direction around the inside of the landfill perimeter chain-link fence (see attached map). Brian and Chris indicated that efforts had been made recently to remove vegetative overgrowth (particularly poison ivy) from, and fallen trees overlying, the landfill perimeter fence. Brian also indicated that Vanchlor had purchased new warning signage for the perimeter fence and would be installing the signs soon. The wells that are sampled as part of the groundwater monitoring program were marked with signs and appeared to be in reasonably good condition. The landfill had been mowed and the grassy vegetative cover appeared to be well established with no apparent bare spots. No leachate seeps were observed on the landfill or along its perimeter inside the fenceline.

We then inspected the area downslope of the interceptor trench and southeast of well VDM-14 for evidence of leachate seeps. Most of the leafy vegetation had dropped their leaves, which permitted good viewing through the standing vegetation outside the landfill. We also checked the area outside the perimeter fence for about 100 feet downslope toward the railroad trestle. We did not find any visible seeps, discoloration, or signs of distressed vegetation.

Action Item: The SMP specifies that routine mowing of the vegetative cover will be performed after September 1. However, Chris and Brian asked if the landfill could also be mowed earlier in the season (e.g., June) <u>and</u> after September 1 to prevent the establishment of any vegetation, such as trees or Sumac, whose root systems may adversely impact the integrity of the compacted clay cap. <u>NYSDEC to provide a reply to this verbal request.</u>

A map showing the monitoring well locations and photos taken during the inspection activities are attached below.

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Southeastward view of access gate at north end of landfill.



Views of monitoring wells VDM-11 and VDM-12.



Views of monitoring wells VDM-10 and VDM-9R.



Southeastward view (downslope) near monitoring well VDM-14 showing area inspected for leachate seeps.



Closeup view of monitoring well VDM-14 (right) and view upslope toward VDM-14 (left).



Northward view from southern end of landfill (near VDM-9R) toward gate.