NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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SITE INSPECTION REPORT

Facility: Vanchlor Company, Inc. (Vanchlor) Landfill 600 Mill Street, City of Lockport, Niagara County, NY 14094 DEC Site # 932039 EPA ID – NYD991290529

Dates: August 14, 2023 (09:15 – 11:45); August 15, 2023 (09:00 – 10:30)

Personnel On Site: August 14, 2023 - Steven Moeller (NYSDEC PM); Brian Law (Vanchlor - Operations Manager); Bryan Hann (Orion Environmental Solutions, LLC - Geologist); Tom Webster (Alpha Analytical Inc. - Vanchlor's sampling and analytical laboratory contractor). **August 15, 2023** - Steven Moeller (NYSDEC PM); Brian Law (Vanchlor - Operations Manager); Tom Webster and Amber Fleischman (Alpha Analytical Inc. - Vanchlor's sampling and analytical

Weather: August 14, 2023 - Overcast, 80° F, humid, calm; August 15, 2023 - Overcast, 68° 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: 2023 Annual Groundwater Sampling and Landfill Inspection Event

A team from Alpha Analytical (Tom Webster and Amber Fleischman) was on site to perform the annual purging/sampling from four onsite, downgradient well locations (VDM-9R, VDM-10, VDM-11, and VDM-14R) and one offsite, upgradient location (D-55) using dedicated HDPE bailers in accordance with the Vanchlor Landfill Groundwater Monitoring Plan (Appendix E of the SMP); well VDM-12, located in the center of the landfill, was dry and could not be sampled (see attached map). The dry conditions found in well VDM-12 are normal and provide a good indication that the cap is preventing infiltration, because prior to landfill capping VDM-12 had sufficient water to allow for sample collection. Wells VDM-9R, -10, -11, -14R, and D-55 were purged on August 14, 2023 (many purged to dryness, or near dryness), were allowed to recover overnight, and were sampled on August 15, 2023. Depth to water measurements were recorded in each well prior to purging and sampling with an electronic water level indicator. Purge water was collected, containerized, and transported back to the nearby Vanchlor plant facility for disposal. A surface water sample was also collected on August 15, 2023 using a dipper pole from Eighteen Mile Creek downstream from the southern end of the landfill, but upstream of the City of Lockport Wastewater treatment plant SPDES discharge point.

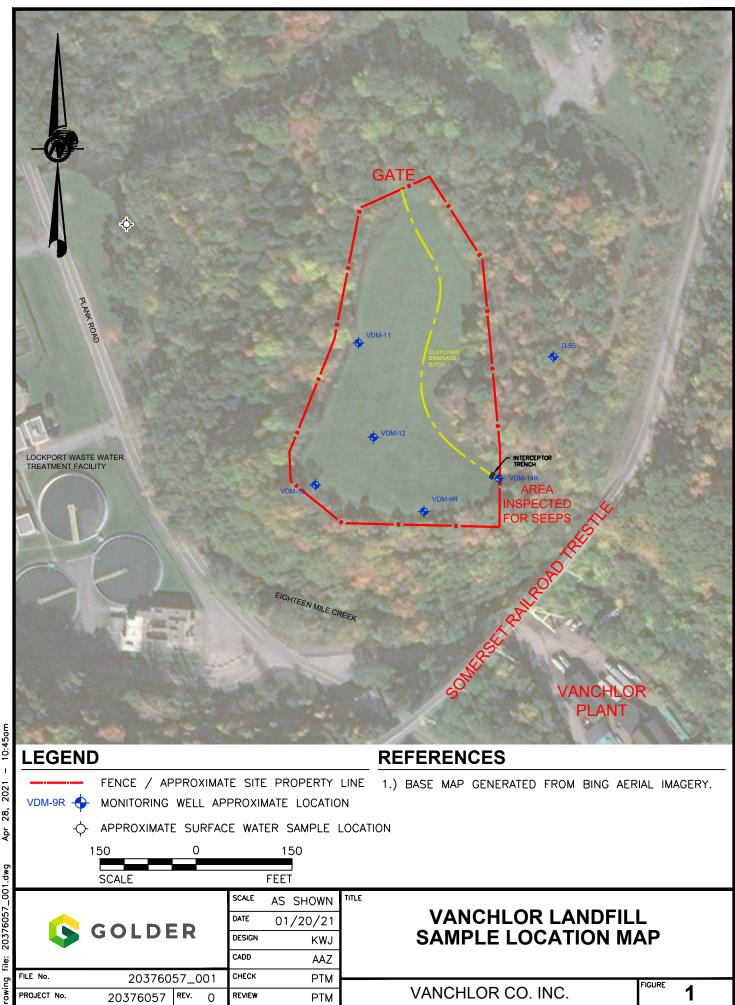
A Landfill Inspection was performed by Brian Law (Vanchlor), Bryan Hann (Orion), and Steven Moeller (NYSDEC) on August 14, 2023. This inspection included observation of the groundwater monitoring well purging activities and inspection of the monitoring wells, the landfill cap, perimeter fenceline, and surrounding areas. 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, proceeded in a counterclockwise direction around the inside of the landfill perimeter chain-link fence, and included some areas outside the landfill (see attached map). The wells that are sampled as part of the groundwater monitoring program were marked with signs and appeared to be in good condition. All the sampled wells had stickup protective casings secured with padlocks.

The landfill had been mowed recently and the grassy vegetative cover was well established with no bare spots. Brian Law noted a small depressional area (maybe 2 feet in diameter by 6 inches deep; still grassy) about 50 feet northeast of well VDM-12. Brian indicated that Vanchlor would repair this depression by filling it with topsoil.

No standing water or leachate seeps were observed on the landfill or along its perimeter inside the fenceline. I inspected the area downslope of the interceptor trench and southeast of well VDM-14R for evidence of leachate seeps and did not find any visible seeps, discoloration, or signs of distressed vegetation. No breaches were noted in the perimeter fence surrounding the landfill. Vanchlor had repaired the small gap in the perimeter chain-link fence southeast of well VDM-14R identified during the August 2022 landfill inspection.

Action Item: Vanchlor to repair the small depressional area northeast of VDM-12 with topsoil.

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



20376057_001.dwg file: Drawing

10:45am

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Southeastward view of perimeter fence access gate at north end of landfill. Note grassy, mowed landfill cap and "NO TRESPASSING" signs posted on perimeter fence.



Views of monitoring wells VDM-11 and VDM-12. Note dedicated bailer used for purging/sampling on VDM-11.



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



View of monitoring well VDM-14R during purging with dedicated bailer.



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



A northward view of the west side of the landfill taken from near VDM-10.



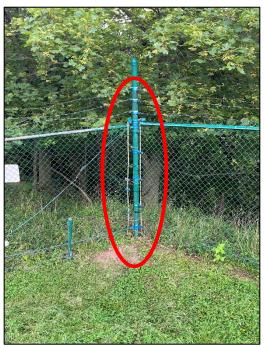
An eastward view of the south side of the landfill taken from near VDM-10.



A northward view of the east side of the landfill.



Small depression northeast of well VDM-12 observed during the landfill inspection. Brian Law (Vanchlor) said they would repair the depression by filling it with topsoil



Repaired small gap in the perimeter chain-link fence southeast of well VDM-14R (identified during the August 2022 landfill inspection).



View of upgradient monitoring well D-55, located outside the east side of the landfill perimeter fence.



A westward view of the landfill perimeter fence near upgradient monitoring well D-55 showing typical "NO TRESPASSING" signage posted around the landfill perimeter.



Groundwater sample collection at well VDM-9R.



Surface water sample collection from Eighteen Mile Creek using a dipper pole.