

MEMORANDUM

TO: Andrea Caprio, P.E., Regional Remediation Engineer

FROM: Steven Moeller, P.G., Professional Geologist 1

DATE: September 17, 2025

SUBJECT: RCRA COMPREHENSIVE GROUNDWATER MONITORING EVALUATION (CME) & FIELD INSPECTION REPORT

Facility: Vanchlor Company Inc. (formerly VanDeMark) Landfill

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

DEC Site # 932039 EPA ID - NYD991290529

Background: The Vanchlor Landfill site consists of a 2.5-acre landfill portion of a 5-acre parcel located along the top of the Niagara Escarpment in Lockport, New York that was used to dispose of process wastes from the nearby VanDeMark Chemical Inc. (VDM) manufacturing facility (Figure 1). The site is bounded by Mill Street to north, a Somerset Railroad Corp rail corridor to the south and east, and Plank Road and the City of Lockport Wastewater Treatment facility to the west (Figure 2). Eighteen Mile Creek is located south and west and ~100 feet vertically below the landfill at the base of the Escarpment. Wooded areas surround the capped, grassy landfill. The VDM Chemical plant facility is located approximately ¼-mile to the east-southeast and the former Vanchlor Company plant facility is just to the southeast of the landfill.

From 1957 until 1982, VDM landfilled drums of silicon tetrachloride and chlorodisiloxane at the site in trenches with powdered limestone. The limestone was used to react with the decomposing products from the drums in an effort to neutralize the acidic waste material. VDM installed new monitoring wells in 1983 as part of a closure investigation and submitted a closure plan in the spring of 1984. Groundwater was impacted by chlorinated VOCs and metals. 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. In 1999, VDM sold the property to Vanchlor Company, Inc.

Following the expiration of the Post-Closure RCRA Permit #9-2909-00049/0003 in September 2013, the NYSDEC requested that Vanchlor Company, Inc. enter into an Order on Consent, executed July 10, 2014. The Order on Consent required development of a Site Management Plan (SMP; 2015). The SMP requires annual inspection of the landfill, groundwater and surface water quality monitoring (see Table 1), and submittal of a Periodic Review Report (PRR) with an Institutional and Engineering Control (IC/EC) certification. The PRR must include discussions of site activities, inspections,

groundwater and surface water quality monitoring results and trend analyses, recommendations, and IC/EC certification.

The principal overburden material observed during the installation of groundwater monitoring wells at the site was a matrix of red brown clayey silt fill intermixed with red rock fragments ranging from 5 to 15 feet in thickness. The bedrock in the vicinity of the Vanchlor Landfill has been reported to include the lower three formations of the Silurian Medina Group (the Grimsby, Power Glen, and Whirlpool Formations in descending order), which is underlain by the Ordovician Queenston Shale Formation. The bedrock formations monitored by onsite and nearby offsite monitoring wells are summarized in Table 4. Well construction diagrams and stratigraphic logs for the monitoring wells in the groundwater monitoring program are provided in Attachment A. Previous rock quarrying operations in the footprint of the landfill resulted in substantial removal of the near surface Grimsby Formation bedrock unit followed by replacement with a layer of fill.

Overburden and bedrock groundwater are inferred to be connected and are therefore considered to be the same aquifer. Historical groundwater elevation data collected from the monitoring well network indicate that the general groundwater flow is in a south-southwesterly direction toward the escarpment bank leading to Eighteen Mile Creek (Figure 3 and 4).

I. Office Evaluation

Prior to the field inspection, relevant documents were compiled, reviewed, and evaluated in accordance with criteria on the CME checklist. These documents included:

- Closure Plan for Solid Waste Management Facility VanDeMark Chemical Co. Inc. Lockport, NY & Somerset Railroad Hydrogeologic Study (1982)
- Former Landfill Investigation and Closure Plan (1984)
- Closure Plan Former Landfill Site (1987)
- Former Landfill Corrective Measures Study and Landfill Cap Evaluation (1995)
- Vanchlor Landfill Property Deed (1999/2013)
- 2013 Annual Report
- Monitoring Well VDM-9 Decommissioning and Replacement Report (2014)
- The Order on Consent and Administrative Settlement, Index # B9-0834-14-07 (2014)
- Site Management Plan (2015)
- Annual Periodic Review Reports (PRR) and IC/EC Certifications (2014-2024)
- Correspondence File (1994-2015)
- Previous Groundwater Inspection Reports (2005, 2008, 2013, 2019, and 2022)

The completed CME checklist is provided in Attachment B. Assessment activities for the landfill were performed in the 1980s and 1990s with extensive investigation of hydrogeology and contaminant nature and extent. The landfill was closed (capped) in 1988 in accordance with a NYSDEC (the Department) approved Closure Plan and subsequent post-closure monitoring has been performed under a Part 373 RCRA Permit (until 2013) and Order on Consent (since 2014). In accordance with the 2015 Site

Management Plan (SMP), groundwater (wells D-55, VDM-9R, VDM-10, VDM-11, VDM-12, and VDM-14R) and surface water (Eighteen Mile Creek) samples were collected annually through 2024 and analyzed for a site-specific list of chlorinated volatile organic compounds (VOCs), metals, chloride, and pH.

Tetrachloroethene, trichloroethene, trans-1,2-dichloroethene, vinyl chloride, 1,1,2-trichloroethane, 1,2-dichloroethane, chloroform, methylene chloride, chromium, copper, iron, and chloride are detected at concentrations above groundwater standards, primarily in well VDM-14R which has historically demonstrating the highest groundwater contaminant concentrations (Table 2). Any landfill leachate or underflow may be directed to a ditch running along the northeast edge of the landfill which flows toward well VDM-14R.

Emerging contaminant sampling was performed in 2018 at 3 wells (upgradient well D-55 and downgradient wells VDM-10 and VDM-14R) and identified perfluorooctanoic acid (PFOA; 11.9 ng/L in VDM-14R) and 1,4-dioxane (72 ug/L in D-55) in site groundwater at concentrations above their respective groundwater guidance values. The same wells were sampled again in August 2024 for PFAS compound and 1,4-dioxane analyses (Table 3); PFOA (17.2 ng/L in VDM-14R) and 1,4-dioxane (110 ug/L in D-55 and 1.13 ug/L in VDM-10) were again detected at concentrations exceeding their respective groundwater guidance values. The highest 1,4-dioxane detections have occurred in upgradient well D-55, indicating an apparent upgradient offsite source.

The monitoring program was significantly modified based upon recommendations made in the 2024 PRR, which included:

- Wells VDM-9R, VDM-10, VDM-11, and VDM-14R will continue to be monitored to provide effective detection for downgradient and potential off-site migration of chemicals of potential concern COPCs. However, the frequency of monitoring was modified from annually (every year) to biannually (every two years);
- Due to several decades of consistent reporting of VOCs and total metals (chromium, copper, and zinc) at concentrations either as non-detect or well below groundwater standards, sampling of upgradient well D-55 and Eighteen Mile Creek surface water will be discontinued;
- Cis-1,2-dichloroethene will replace bromomethane on the required analytical VOC list for groundwater analysis for the next planned sampling event in July/August 2026 and subsequent events thereafter:
- Should any of the monitored groundwater parameters be detected at either a
 concentration exceeding the individual AWQS/GV for two consecutive annual
 monitoring events or indicate an increasing trend for three (or more) consecutive
 monitoring events, then the compound will be included as a trend tracked
 parameter;
- Site inspections, to verify the IC/ECs employed at the Site are unchanged from the original design and/or previous certifications, as well as mowing and landfill maintenance activities will continue on an annual basis (every year);
- The PRR reporting frequency was modified from annual to biannual reporting (every two years), to coincide with the biannual groundwater monitoring frequency,

with the next PRR due March 15, 2027. This biannual report will include the findings of the inspection and maintenance activities performed annually.

Since there have been several approved modifications to the post-closure monitoring program since the SMP was issued in 2015, including those noted above, the SMP should be updated to incorporate the approved changes to the monitoring program and consideration should be given to adding carbon tetrachloride, 1,4-dioxane, and PFAS compounds to the site-specific analyte list.

II. Field Evaluation

On August 12 and 13, 2024, Steven Moeller, PG, conducted a field Inspection at the Vanchlor Landfill during the 2024 Annual Groundwater and Surface Water Sampling and Landfill Inspection Event. This inspection included observation of groundwater and surface water sample collection activities and inspection of monitoring wells, the landfill cap, perimeter fenceline, and surrounding areas. Photographs taken during the inspection are included in Attachment C.

Onsite Personnel:

- August 12, 2024: Steven Moeller (NYSDEC PM/Inspector); Brian Law (former Vanchlor Company Inc. – Operations Manager); Bryan Hann (TRC - PM); Amber Fleischman, Nicholas Kibby, and Kyle Nichter (Alpha Analytical Inc. - Vanchlor's sampling and analytical laboratory contractor)
- August 13, 2024: Steven Moeller (NYSDEC PM/Inspector); Amber Fleischman, Nicholas Kibby, and Kyle Nichter (Alpha Analytical Inc. - Vanchlor's sampling and analytical laboratory contractor)

Weather: August 12, 2024 - Sunny, mostly clear, 65° F, slight breeze; August 13, 2024 - Sunny, mostly clear, 65° F, calm

The annual groundwater sampling event was performed on August 12 (well purging), 13 (well sampling), and 14 (only extra sample volume from VDM-10), 2024 by Vanchlor's sampling contractor personnel. Four onsite, downgradient well locations (VDM-9R, VDM-10, VDM-11, and VDM-14R) and one offsite, upgradient location (D-55) were purged and sampled in accordance with the Vanchlor Landfill Groundwater Monitoring Plan (Appendix E of the SMP); well VDM-12 was dry and could not be sampled (Figure 3). The dry conditions found in well VDM-12 are a good indication that the cap is successfully preventing precipitation infiltration, because prior to capping VDM-12 had sufficient water to allow for sample collection. The groundwater monitoring network appeared to be in generally good condition with all wells being locked and functional (see attached photos). Depth to water and bottom measurements were recorded with an electronic water level indicator prior to initiating well purging activities (Table 4); depth to water measurements were also recorded prior to sample collection (see Attachment C). Depth to water and bottom measurements were also recorded in wells D-52, D-56, VDM-5, and VDM-6 to evaluate groundwater flow in the deeper Queenston Shale Unit (Table 4 and Figure 4).

Wells were purged on August 12 with dedicated HDPE bailers for 3 well volumes (VDM-14R) or until dryness (D-55, VDM-9R, VDM-10, and VDM-11). The well purge water was containerized in a blue poly open top drum, which was taken to the nearby Vanchlor Company plant facility for subsequent characterization and disposal. The well purging/sampling logs are included in Attachment D.

The wells were allowed to recover overnight and sampled with the same dedicated HDPE bailers on August 13 for analysis of the site-specific list of chlorinated volatile organic compounds, metals, chloride, and pH. A surface water sample was also collected on August 13 from Eighteen Mile Creek using a long-handled HDPE sample dipper at a location downstream from the Site, but upstream of the City of Lockport Wastewater treatment plant SPDES discharge point, for analysis of the same analytical parameters (Figure 1). As previously noted, Vanchlor also agreed to collected sample aliquots from upgradient well D-55 and downgradient wells VDM-10 and VDM-14R for PFAS compound and 1,4-dioxane analyses to further evaluate the concentrations of these emerging contaminants in site groundwater.

Volatile organic sample containers were filled first followed by the metals and chloride containers. Field QC samples included: trip blanks for VOC analysis; duplicate and MS/MSD samples collected at well VDM-14R for all analytical parameters; and an Ambient Field Blank and an Equipment Rinse Blank for PFAS compound and 1,4-dioxane analyses. Field parameter measurements included sample pH (wells and surface water) and temperature (surface water only) with an Oakton pH/temperature meter.

A site-wide inspection of the landfill was also performed. Site access is controlled by a road gate at the bottom of the Mill Street access road and a locked gate in the perimeter fence that surrounds the landfill; both gates were locked and the perimeter fence was in good condition with adequate warning signage. The landfill cap appeared to be well grassed and in good condition; Brian Law stated that the grass had been mowed approximately 2 months ago. No standing water, staining, or distressed vegetation was noted, especially in the ditch running along the northeast edge of the landfill, which potentially flows toward well VDM-14R.

NOTE - Brian Law indicated that the nearby Vanchlor Company plant facility, which provided support for landfill operation and maintenance activities, had recently closed and the business had been sold. Future operations at the facility were uncertain.

III. Summary

Based upon a review of site-related documents (including the Groundwater Monitoring Plan), oversight of groundwater and surface water sample collection, and inspection of the landfill facility, the Department has determined that the facility is in compliance with their post-closure monitoring program as required by the SMP and Order on Consent.

Since there have been several approved modifications to the post-closure monitoring program since the SMP was issued in 2015, the SMP should be updated to incorporate

the approved changes. Since the degradation daughter products chloroform and methylene chloride are detected in site groundwater samples, the likely parent product carbon tetrachloride should be added to the routine biannual VOC sampling analysis reporting list. Analyses for PFAS compounds and 1,4-dioxane should be performed on a periodic basis (perhaps every other sampling event) to track the fate and transport of these compounds in site groundwater.

ATTACHMENTS

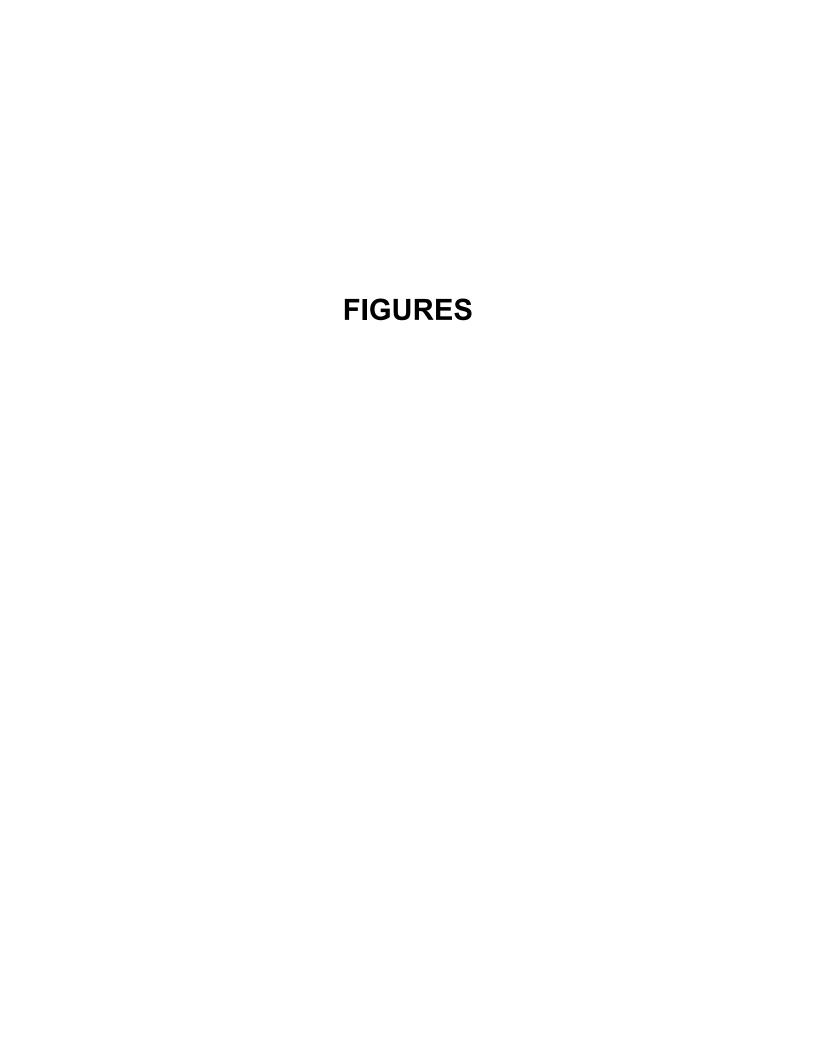
Figures Tables

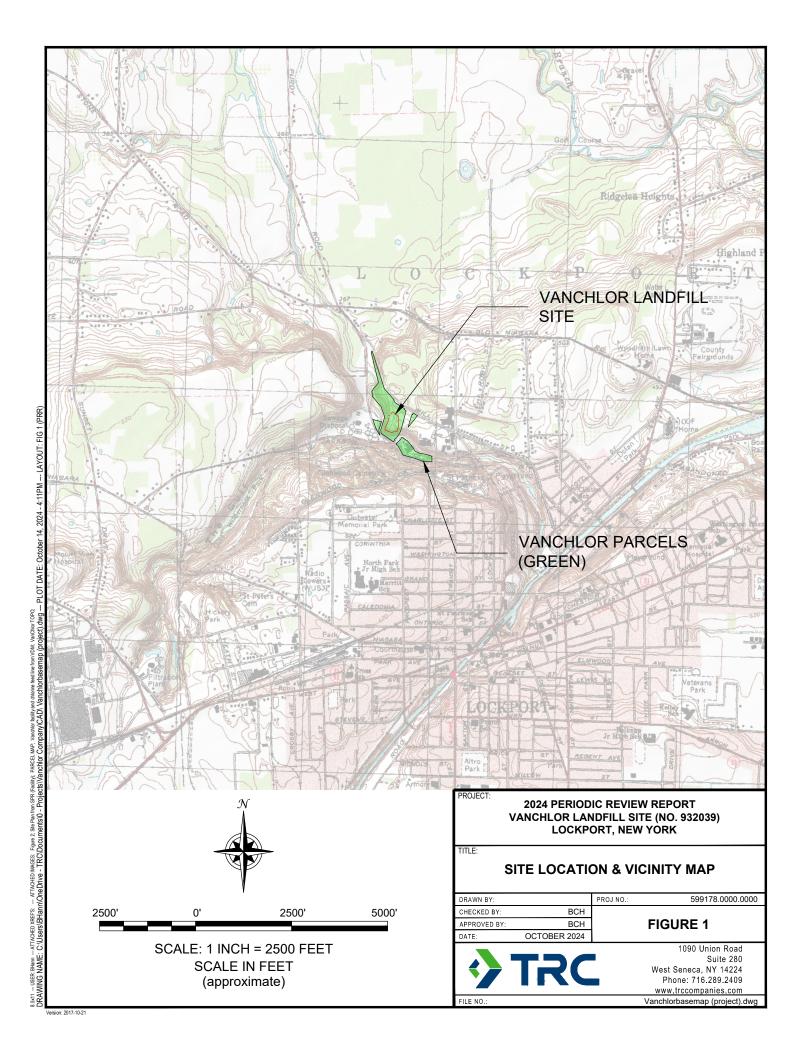
Attachment A - Well Construction Diagrams and Stratigraphic Logs

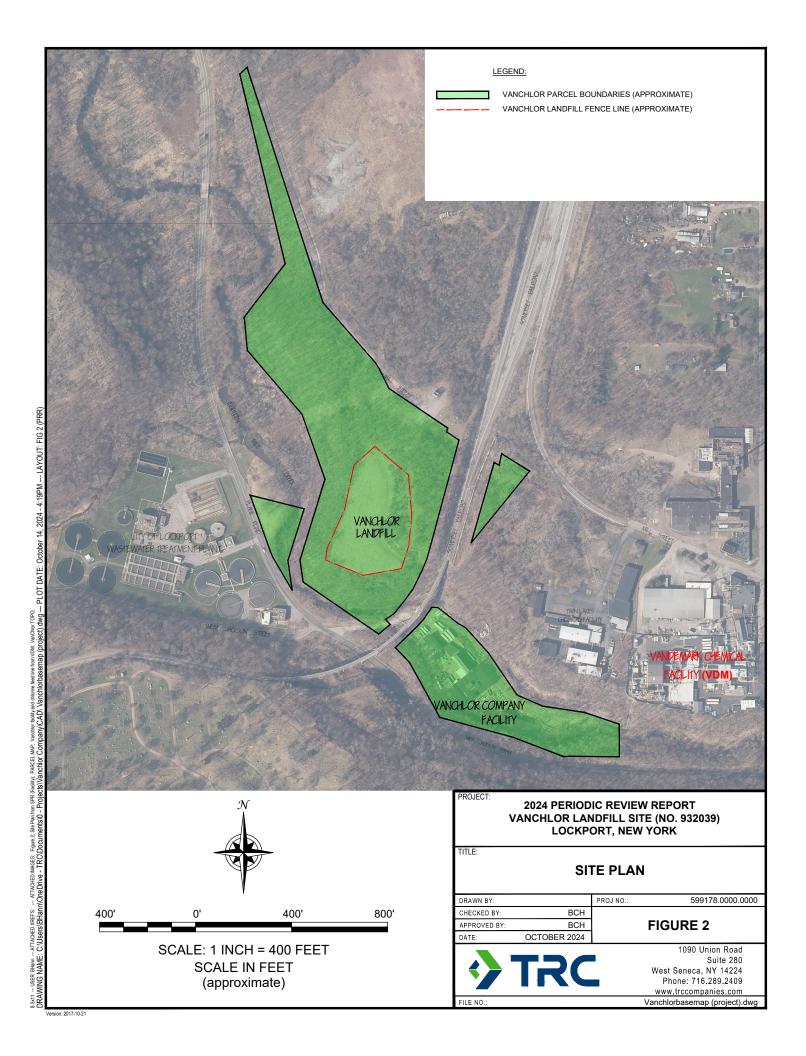
Attachment B - CME Checklist

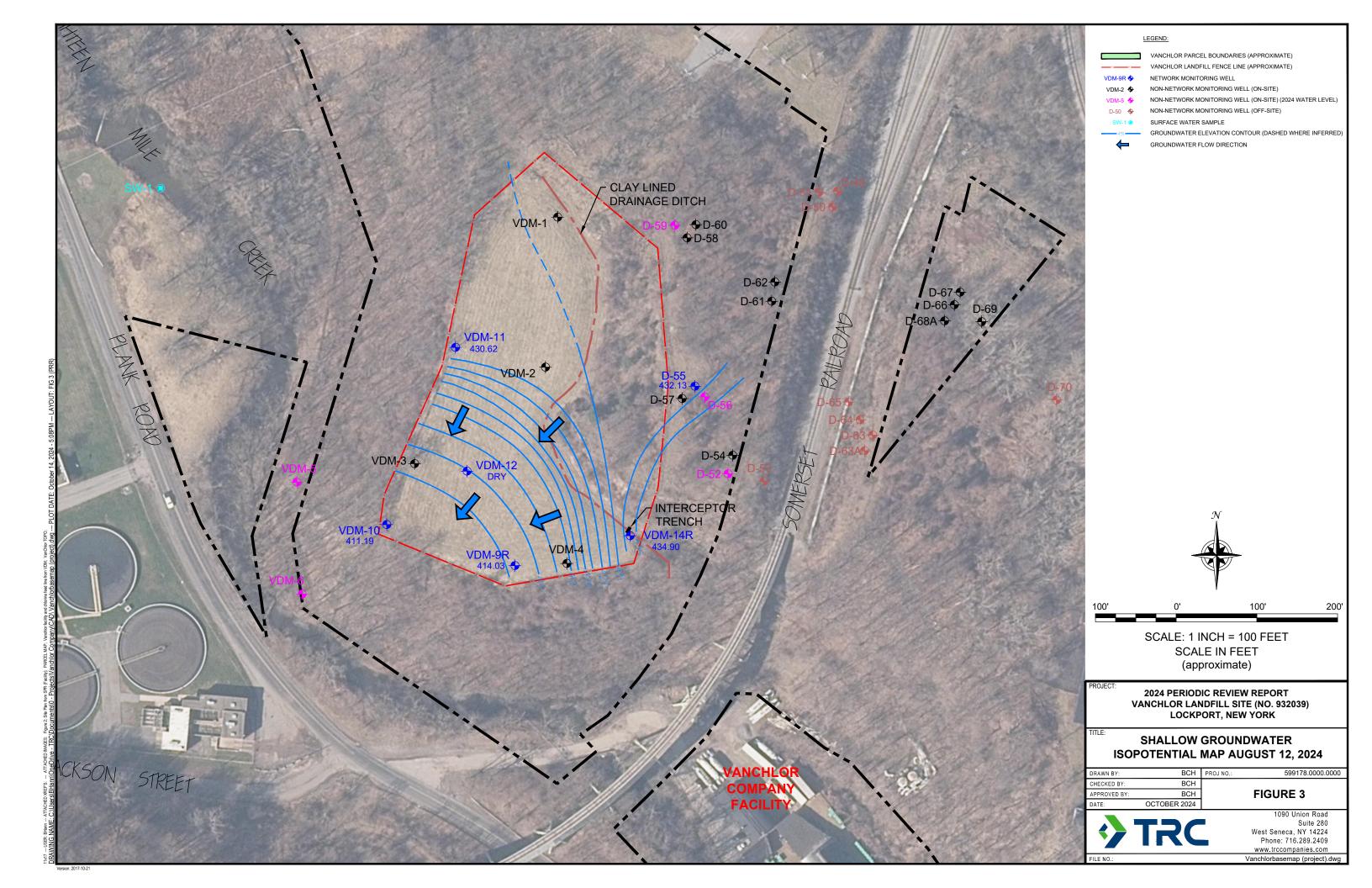
Attachment C - Photographs

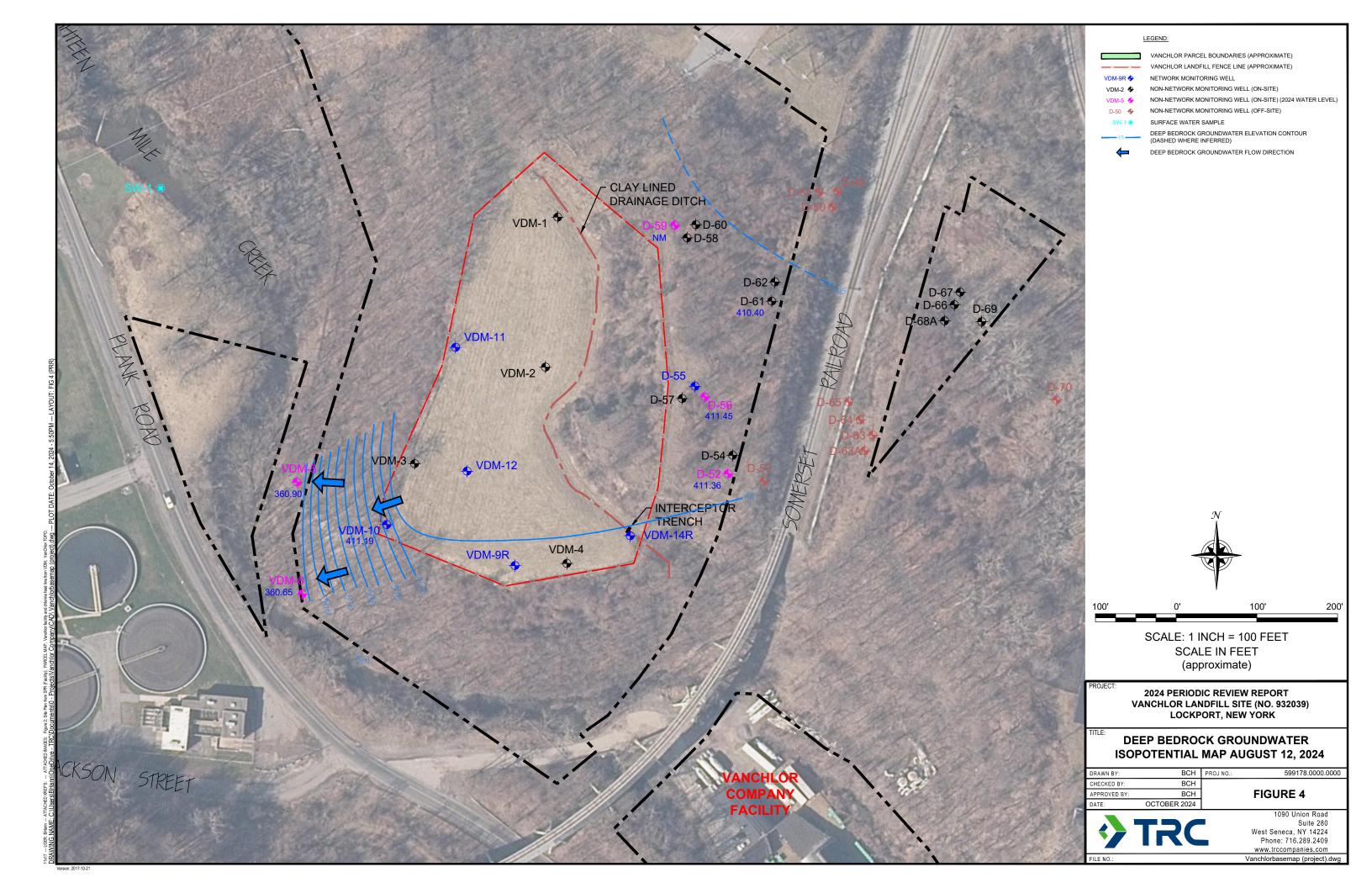
Attachment D - Well Purging/Sampling Logs

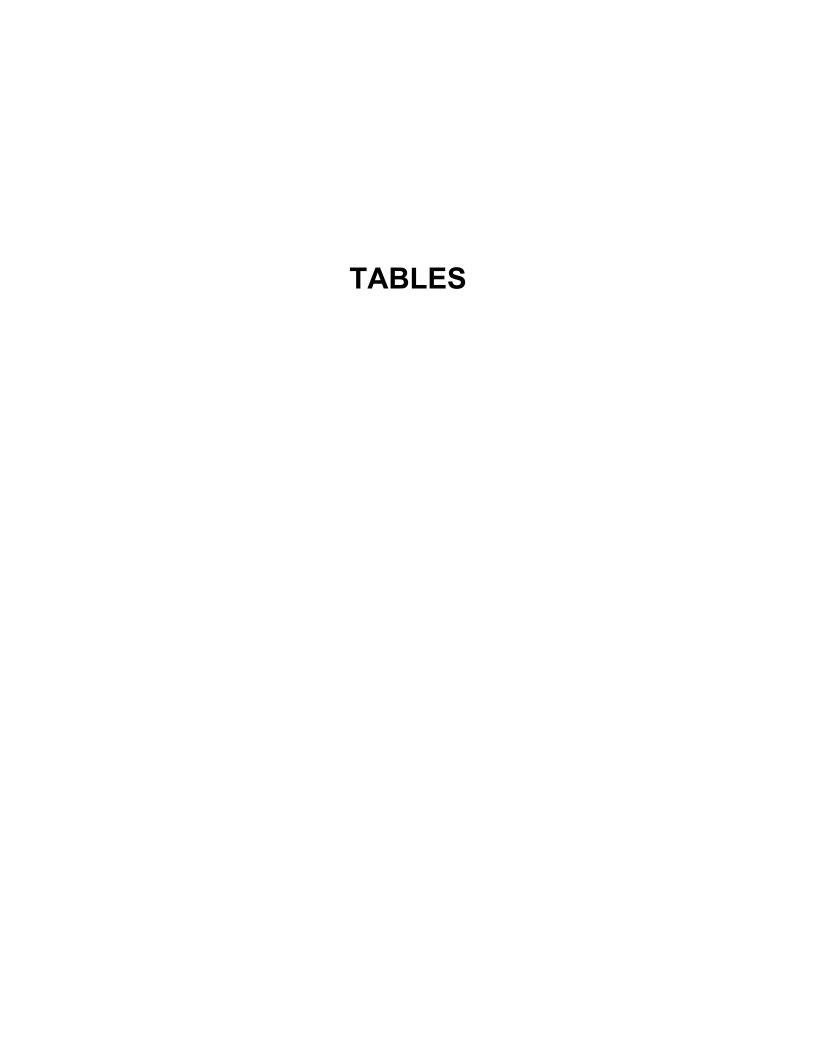














MONITORING / INSPECTION PROGRAM SCHEDULE

Periodic Review Report February 13, 2024 to February 13, 2025 Vanchlor Landfill Site (932039) Lockport, New York

Monitoring Program	Frequency ¹	Matrix Description	Analyses
Annual Groundwater & Surface Water Monitoring	Annual (during 3rd quarter)	Sample groundwater from wells: D-55 VDM-9R VDM-10 VDM-11 VDM-12 VDM-14R Sample surface water from Eighteen Mile Creek (just downstream of Site)	Volatile Organic Compounds (VOCs), Method 8260 Metals, Method 6010 Chloride, 9251 Field measured pH
Annual Site & Groundwater System Inspection	Annual (during 3rd quarter)	Inspect cover system integrity, vegetation condition, ditch lining, security fence and signage, monitoring well condition.	Check for iron staining in drainage ditch and visible seeps in the cliff face

Notes:

^{1.} The frequency of events will be conducted as specified until otherwise approved by NYSDEC and NYSDOH



GROUNDWATER & SURFACE WATER ANALYTICAL SUMMARY

Periodic Review Report February 13, 2024 to February 13, 2025 Vanchlor Landfill Site (932039) Lockport, New York

			1					Mo	nitoring Location, Sar	nple Date,	Lab Data Package No.			
		NY-AWQS 1	NY-AWQS ¹		VDM-9R		VDM-10		VDM-11		VDM-14R		D-55	Eighteen Mile Creek
Parameter	CasNum	Class GA	Class D H(FC) & A(A)	Units	08/13/2024 L2445707-05 Qual	Trend ²	08/14/2024 L2445935-01 Qual	Trend ²	08/13/2024 L2445707-01 Qual	Trend ²	08/13/2024 L2445707-02 Qual	Trend ²	08/13/2024 L2445707-04 Qual	08/13/2024 L2445707-03 Qual
Field Measurements		,												
Field pH	NA	6.5 - 8.5	6.5 - 8.5	S.U	6.04		6.33		6.24		5.63		7.29	6.95
Temperature	NA			DEG C	17.4		18.2		17.9		NA		17.2	22.8
Appearance & Odor	NA			visual/olfactory	floating solids, none		clear, none		clear, sl. odor		sl. orange, none		clear, none	clear, none
Volume purged (to dryness)	NA			gallons	± 0.75		± 3.5		± 0.5		± 5.5		± 4.5	NA
Wet Chemistry														
Chloride	NA	250,000		ug/L	6,900,000 D		4,400,000 D		1,000,000 D		3,100,000 D		16,000	49,000
TCL Volatile Organic Compounds	(VOCs)													
1,1,2,2-Tetrachloroethane	79-34-5	5		ug/L	0.50 J	see Note 3	0.5 U	see Note 3	0.99	see Note 3	53 D	D (10)	0.5 U	0.5 U
1,1,2-Trichloroethane	79-00-5	1		ug/L	1.5 U		1.5 U		1.5 U		37 D	1	1.5 U	1.5 U
1,2-Dichloroethane	107-06-2	0.6		ug/L	0.24 J	see Note 3	1.1	D (11)	0.27 J	see Note 3	11 D	N (12)	0.5 U	0.5 U
Bromochloromethane	74-97-5	5		ug/L	2.5 U		2.5 U		2.5 U		5.0 U		2.5 U	2.5 U
Chloroform	67-66-3	7		ug/L	2.5 U	see Note 3	9	N (23)	2.4 J	see Note 3	20 D	D (16)	2.5 U	2.5 U
Methylene chloride	75-09-2	5	200	ug/L	2.5 U	see Note 3	2.5 U	see Note 3	2.5 U	see Note 3	1.8 JD	see Note 3	2.5 U	2.5 U
Tetrachloroethene	127-18-4	5	1*	ug/L	0.66	see Note 3	0.5 U	see Note 3	4.4	see Note 3	170 D	D (17)	0.5 U	0.5 U
Toluene	108-88-3	5	6,000	ug/L	2.5 U	see Note 3	2.5 U	see Note 3	2.5 U	see Note 3	5.0 U	N (12)	2.5 U	2.5 U
trans-1,2-Dichloroethene	156-60-5	5		ug/L	2.5 U	see Note 3	2.5 U	see Note 3	2.5 U	see Note 3	16 D	N (9)	2.5 U	2.5 U
Trichloroethene	79-01-6	5	40	ug/L	0.4 J	see Note 3	0.2 J	see Note 3	1	see Note 3	81 D	- 1	0.5 U	0.5 U
Vinyl chloride	75-01-4	2		ug/L	0.51 J	see Note 3	1.0 U	see Note 3	1.0 U	see Note 3	41 D	- 1	1.0 U	1.0 U
Total Metals														
Chromium, Total	NA	50		ug/L	1.82	see Note 3	15.29	see Note 3	32.3	see Note 3	16.8	D (17)	1.49	0.52 J
Copper, Total	NA	200		ug/L	56.88	see Note 3	673.7	N (8)	245.4	N (7)	14.53	see Note 3	9.26	4.5
Iron, Total	NA	300	300	ug/L	120,000		21,600		22,900		468,000		964	458
Zinc, Total	NA	2,000*		ug/L	65.64	see Note 3	460.8	see Note 3	135.6	see Note 3	317.1	see Note 3	9.2 J	7.77 J

Notes:

- 1. NYS Ambient Water Quality Standards/Guidance Values; NYSDEC June 1998 Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1. Guidance values are marked with a " * ". Class GA for groundwater and Class D H(FC) and A(A) for surface water.
- 2. The value shown in parentheses indicates the number of years the concentration indicates neither an increasing or decreasing trend (N = Neutral) OR the value indicates the number of years of a decreasing concentration trend (D = Decreasing). An "I" indicates the trend is increasing.
- 3. Based on historical analysis, this parameter was removed from trend analysis reporting and assessment in 2023 per NYSDEC approval.

Qualifier Key:

- D = Concentration of analyte was quantified from diluted analysis. Flag only applies to field samples that have detectable concentrations of the analyte.
- J = The analyte was positively identified; the associated numerical value is an approximate concentration of the analyte in the sample.
- U = The analyte was analyzed for, but was not detected above the level of the associated reported quantitation limit.
- -- = does not apply to this parameter
- H(FC) = Human Consumption of Firsh (fresh waters)
- HA(A) = Fish Survivial (fresh waters)

Color Code:

= concentration exceeds the NYSDEC Class GA AWQS/GV or NYSDEC Class D H(FC) / A(A) Surface Water Standard/Guidance Value.
= based on trend analysis, this parameter is recommended to continue trend analysis reporting.

Trend Definitions:

Increasing (I) - significant increasing trend identified on the plot for that parameter.

Decreasing (D) - significant decreasing trend identified on the plot for that parameter.

Neutral (N) - no significant increasing or decreasing trend identified on the plot for that parameter.



SUMMARY OF GROUNDWATER EMERGING CONTAMINANT RESULTS AUGUST 2024

Periodic Review Report February 13, 2024 to February 13, 2025 Vanchlor Landfill Site (932039) Lockport, New York

								2024	
Parameter	Abbreviation	CasNum	NYSDEC	NYSDOH	USEPA	Units	VDM-10	VDM-14R	D-55
T didilictor	Abbieviation	Gusitum	AWQS/GV ¹	MCL	MCL	Omis	L2445727-01	L2445727-02	L2445727-03
							08/13/2024	08/13/2024	08/13/2024
							Qual	Qual	Qual
1,4 Dioxane by 8270D-SIM (2018) and 8270E-SIM (2024)									
1,4-Dioxane		123-91-1	350	1,000		ng/L	1,130	205	110,000
Perfluorinated Alkyl Acids by EPA Modified 537 (2018) and	EPA 1633 (2024)								
11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid	11CI-PF3OUdS	763051-92-9				ng/L	5.75 U	21.3 U	6.06 U
1H,1H, 2H, 2H-Perfluorodecane sulfonic acid	8:2FTS	39108-34-4				ng/L	5.75 U	21.3 U	6.06 U
1H,1H, 2H, 2H-Perfluorohexane sulfonic acid	4:2FTS	757124-72-4				ng/L	5.75 U	21.3 U	6.06 U
1H,1H, 2H, 2H-Perfluorooctane sulfonic acid	6:2FTS	27619-97-2				ng/L	5.75 U	21.3 U	6.06 U
2H,2H,3H,3H-Perfluorooctanoic acid	5:3FTCA	914637-49-3				ng/L	35.9 U	133 U	37.8 U
3-Perfluoroheptyl propanoic acid	7:3FTCA	812-70-4		-	-	ng/L	35.9 U	133 U	37.8 U
3-Perfluoropropyl propanoic acid	3:3FTCA	356-02-5			-	ng/L	7.19 U	26.7 U	7.57 U
4,8-Dioxa-3H-perfluorononanoic acid	ADONA	919005-14-4				ng/L	5.75 U	21.3 U	6.06 U
9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid	9CI-PF3ONS	756426-58-1				ng/L	5.75 U	21.3 U	6.06 U
Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6			10	ng/L	5.75 U	21.3 U	6.06 U
N-ethyl perfluorooctanesulfonamide	NEtFOSA	4151-50-2				ng/L	1.44 U	5.33 U	1.51 U
N-ethyl perfluorooctanesulfonamido ethanol	NEtFOSE	1691-99-2				ng/L	14.4 U	53.3 U	15.1 U
N-ethyl perfluorooctanesulfonamidoacetic acid	NEtFOSAA	2991-50-6				ng/L	1.44 U	5.33 U	1.51 U
N-methyl perfluorooctanesulfonamide	NMeFOSA	31506-32-8				ng/L	1.44 U	5.33 U	1.51 U
N-methyl perfluorooctanesulfonamido ethanol	NMeFOSE	24448-09-7				ng/L	14.4 U	53.3 U	15.1 U
N-methyl perfluorooctanesulfonamidoacetic acid	NMeFOSAA	2355-31-9				ng/L	1.44 U	5.33 U	1.51 U
Nonafluoro-3,6-dioxaheptanoic acid	NFDHA	151772-58-6				ng/L	2.87 U	10.7 U	3.03 U
Perfluoro(2-ethoxyethane)sulfonic acid	PFEESA	113507-82-7				ng/L	2.87 U	10.7 U	3.03 U
Perfluoro-3-methoxypropanoic acid	PFMPA	377-73-1				ng/L	2.87 U	10.7 U	3.03 U
Perfluoro-4-methoxybutanoic acid	PFMBA	863090-89-5				ng/L	2.87 U	10.7 U	3.03 U
Perfluorobutanesulfonic acid	PFBS	375-73-5				ng/L	3.13	5.33 U	1.19 J
Perfluorobutanoic acid	PFBA	375-22-4				ng/L	26	11 J	8.12
Perfluorodecanesulfonic acid	PFDS	335-77-3				ng/L	1.44 U	5.33 U	1.51 U
Perfluorodecanoic acid	PFDA	335-76-2				ng/L	1.44 U	5.33 U	1.51 U
Perfluorododecanesulfonic acid	PFDoS	79780-39-5				ng/L	1.44 U	5.33 U	1.51 U
Perfluorododecanoic acid	PFDoA	307-55-1				ng/L	1.44 U	5.33 U	1.51 U
Perfluoroheptanesulfonic acid	PFHpS	375-92-8				ng/L	1.44 U	5.33 U	1.51 U
Perfluoroheptanoic acid	PFHpA	375-85-9				ng/L	0.395 J	1.28 J	0.833 J
Perfluorohexanesulfonic acid	PFHxS	355-46-4			10	ng/L	1.44 U	5.33 U	1.51 U
Perfluorohexanoic acid	PFHxA	307-24-4				ng/L	0.791 J	1.76 J	0.908 J
Perfluorononanesulfonic acid	PFNS	68259-12-1				ng/L	1.44 U	5.33 U	1.51 U
Perfluorononanoic acid	PFNA	375-95-1			10	ng/L	1.44 U	5.33 U	0.538 J
Perfluorooctanesulfonamide	PFOSA	754-91-6				ng/L	1.44 U	5.33 U	1.51 U
Perfluorooctanesulfonic acid	PFOS	1763-23-1	2.7	10	4	ng/L	1.44 U	5.33 U	1.36 J
Perfluorooctanies acid	PFOA	335-67-1	6.7	10	4	ng/L	1.49	17.2	6.49
Perfluoropentanoic acid	PFPeA	2706-90-3			<u> </u>	ng/L	0.819 J	10.7 U	0.833 J



SUMMARY OF GROUNDWATER EMERGING CONTAMINANT RESULTS AUGUST 2024

Periodic Review Report February 13, 2024 to February 13, 2025 Vanchlor Landfill Site (932039) Lockport, New York

		CasNum	NYSDEC	NYSDOH MCL				2024				
Parameter	Abbreviation				USEPA	Units	VDM-10	VDM-14R	D-55			
			AWQS/GV ¹		MCL		L2445727-01	L2445727-02	L2445727-03			
							08/13/2024	08/13/2024	08/13/2024			
							Qual	Qual	Qual			
Perfluoropentansulfonic acid	PFPeS	2706-91-4			1	ng/L	1.44 U	5.33 U	1.51 U			
Perfluorotetradecanoic acid	PFTeDA	376-06-7			1	ng/L	1.44 U	5.33 U	1.51 U			
Perfluorotridecanoic acid	PFTrDA	72629-94-8			1	ng/L	1.44 U	5.33 U	1.51 U			
Perfluoroundecanoic acid	PFUnA	2058-94-8				ng/L	1.44 U	5.33 U	1.51 U			
USEPA Hazard Index (sum of two or more of PFHxS, PFNA, HFPO-DA, & PFBS)					1	unitless	0.002	0.000	0.054			

Notes

- 1. NYS Ambient Water Quality Class GA Groundwater Quality Standards/Guidance Values (AWQS/GV); NYSDEC June 1998 Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1.
- 2. PFAS compounds used to calculate the USEPA Hazard Index are shaded green.

Qualifier Key:

- J = The analyte was positively identified; the associated numerical value is an approximate concentration of the analyte in the sample.
- U = The analyte was analyzed for, but was not detected above the level of the associated reported quantitation limit.
- -- = There is no value for this parameter.

Color Code:

= concentration exceeds both the NYSDEC Class GA Ambient Water Quality Guidance Value (AWQGV) and the NYSDOH Maximum Contaminant Level (MCL).

- = concentration exceeds the USEPA MCL.
- = concentration exceeds the NYSDEC Class GA Ambient Water Quality Guidance Value (AWQGV), the NYSDOH Maximum Contaminant Level (MCL), and USEPA MCL.



SUMMARY OF GROUNDWATER ELEVATIONS 08/12/2024

Periodic Review Report February 13, 2024 to February 13, 2025 Vanchlor Landfill Site (932039) Lockport, New York

Well No.	Date	Top of Riser Elevation ² (fmsl)	Total Depth (fbTOR)	SWL ³ (fbTOR)	GWE ⁴ (fmsl)	Monitored Hydrostratigraphic Unit
VDM-9R	08/12/2024	448.58	39.15	34.55	414.03	Whirlpool
VDM-10	08/12/2024	444.46	46.69	33.27	411.19	Queenston Shale (upper)
VDM-11	08/12/2024	450.33	22.85	19.71	430.62	Power Glen
VDM-12	08/12/2024	451.01	13.18	dry ⁵	dry ⁵	Overburden: sandy silt, angular rock fragments and green slag
VDM-14R	08/12/2024	444.74	11.60	9.84	434.90	Overburden: sandy silt, angular rock fragments and green slag
D-55	08/12/2024	468.76	47.23	36.63	432.13	Grimsby-Power Glen Contact
VDM-5	08/12/2024	367.60	17.35	6.70	360.90	Queenston Shale
VDM-6	08/12/2024	367.60	7.00	6.95	360.65	Queenston Shale
D-52	08/12/2024	468.69	66.46	57.33	411.36	Whirlpool / Queenston (upper)
D-56 ⁶	08/12/2024	469.44	107.00	57.99	411.45	Whirlpool / Queenston (upper)
D-59 ⁷	08/12/2024	467.25	100.00	NA	NA	Whirlpool / Queenston (upper)
D-61 ⁷	08/12/2024	467.40	48.40	57.00	410.40	Grimsby / Power Glen

Notes:

- 1. Ground surface elevation are based on 2020 GPS measurements (accuracy +/- 0.09FT).
- 2. Top of riser (TOR) elevation.
- 3. SWL = static water level.
- 4. GWE = groundwater elevation.
- 5. dry = monitoring well was dry during the current monitoring event
- 6. Well D-56 total depth exceeded the water level indicator limit; total depth shown is from the well construction log.
- 7. Well D-61 was mistakenly sounded on August 12, 2024 instead of well D-59. No data was obtained from well D-59.
- 8. Wells screened into the Queenston Hydrostratigraphic Unit are color BLUE.

ATTACHMENT A

Well Construction Diagrams and Stratigraphic Logs

GROUND WATER OBSERVATION WELL REPORT

PROJECTSomerset	Railroad - Van De Mark	Page7 of23
LOCATION N1,160,7	56 E468,241	Well No
	Original Depth 46.7 (cored)	
Contract Con	sham Date10/19/81	Power Glen Contact
	Date	Elev. Interval420.7-439.
Ground Elevation 467.4	Type of surface seal:	## d69.36/469.36 ## casing/riser face. Delow ground
Grimsby-Power Glen Contact 433.5	Diameter of borehole Depth of borehole (re Type of backfill: Cem Elev./depth top of sea Type of seal: Benton Elev./depth bottom of Type of sand pack. Q- Depth of top of sand pack Elev./depth top of screen Type of screened section Describe openings 0.00	0.5' amed) ent 45.0' 45.0' 45.0' 442.3/25.1 ite seal. 02 (fine to med. sand) 439.4/28.0 ack. ened section. on: Sch 80 PVC 10" machine
Dazinganao	slot - horizontal sl I.D. of screened section Elev./depth bottom of Length of blank section Elev./depth bottom of section. Elev./depth bottom of Type of backfill below	2.0" screened section. 1.
	pipeCuttings	420.7/46.7

MONITORING WELL INSTALLATION LOG

JOB NO1	14-03185 PROJECT VANDE	MARK/LANDFILL WELL REPI	_ACEMENT/NY well no	VDM-9R SHEET 1 of 1
GA INSP	RJM DRILLING METHOD4	1/4" I.D. HOLLOW STEM A	AUGERS CONC.PAD E	LEV. ~444.0 Ft. WATER DEPTH ~29.0 Ft. BGS
				V. ~447.0 Ft. DATE/TIME 1245/05-29-14
1				1250/05-29-14 COMPLETED 1330/05-29-14
	/ COORDINATES N, E (APPI			TIME / DATE COMPLETED TIME / DATE
LOCATION /	COORDINATES N, E (APP)			
		MATERIALS IN		
				ENTONITE SEAL MEDIUM BENTONITE CHIPS
				ISTALLATION METHOD POUR THROUGH AUGERS
JOINT TYPE	FLUSH THREADED	SLOT SIZE0	. <u>01"-SLOT</u> FI	LTER PACK QTY1.0-BAG
GROUT QUA	NTITY 12-GALLONS	CENTRALIZERS	NOT USED FI	LTER PACK TYPE #00-N SIZE SAND
				ISTALLATION METHOD POUR THROUGH AUGERS
ELEV./DEPTH	SOIL/ROCK DESCRIPTION	WELL	SKETCH	INSTALLATION NOTES
449.23	TOP OF CASING -			BORING LOCATION AUGERED WITH
448.95	TOP OF RISER		-2.95	-
-2	<u> </u>	·l I [4"ø ANODIZED ALUMINUM	4 4" I.D. HOLLOW STEM AUGERS
<u> </u>	<u>-</u>		PROTECTIVE	(HSAs) WITH NO SAMPLING
446.0	EXISTING GROUND SURFACE* -	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	CASING W/LOCK	TI ENT ON WILD TO MITHON: 11:0 11
0.0	=		.¥33535	BELOW GROUND SURFACE (bgs).
- 2]		CONCRETE	DRILLER SWITCHED TO 3 7 TRI-CONE
‡ ⁻]		PAD	ROTARY AIR DRILLING DUE TO HARD
F .	<u> </u>		\mathcal{N}	DRILLING. DRILLED TO 34.4-FT. bgs
E⁴] =		CEMENT/	USING AIR DRILLING. DRILL RODS
ţ.]		BENTONÍTE GROUT	REMOVED AND WELL MATERIALS
- 6	(CL), SILTY CLAY to		<u> </u>	PLACED IN BOREHOLE USING 5.0 FT.
E	(ML) CLAYEY SILT, some			WELL SCREEN, THREADED FLAT-END
- 8	f-c gravel red to <u> </u>		~8"ø BOREHOLE	CAP, 29.0 FT. OF WELL RISER AND
-	interpreted from drill			
10	cuttings and original <u> </u>	[]		SLIP TOP CAP FOR OVERALL LENGTH
- 11		11.0	<i>M</i>	OF 34.4-FT. WELL MATERIALS PLACED
12	<u> </u>		N	TO 34.4-FT WITH APPROX. 2.5 FT.
E]		\mathbb{N}	STICKUP. #00-N SAND POURED
432.0	-	l N	2"ø SCH. 40 PVC RISER	THROUGH AUGERS 34.3-24.3 FT. bgs.
14.0	=		N TVO MISEN	3/8" BENTONITE CHIP SEAL PLACED
_ - 16]			BY HAND 24.3-21.3 FT. bgs. CHIPS
ļ "	<u> </u>	N	N	ALLOWED TO HYDRATE 30 MINUTES.
18]		~3 7/8"ø	CEMENT/BENTONITE GROUT ADDED
E '°	<u> </u>		BOREHOLE	21.3-0.0 FT. bgs. FOLLOWING
-	<u> </u>	l N	N	REMOVAL OF STONE DRILLING BENCH,
20]	1	N	4" DIAMETER ANODIZED ALUMINUM
[Grey-brown siltstone	21.3 -	\bowtie	SQUARE PROTECTIVE CASING PLACED
22	and grey weathered — shale, over dark —	🔯	DENITONITE	OVER RISER AND CEMENTED INTO
E	green—grey sandstone, <u> </u>		BENTONITE CHIP SEAL	CONCRETE PAD WITH 2.5 FT. STICKUP
24	as interpreted from drill	24.3 -		
ļ.	cuttings and original = VDM-9 well log. =			ON 06/02/14. NO SAND PLACED IN
26	[ANNULUS OF PROTECTIVE CASING BY
‡	<u> </u>			DRILLERS.
28]			<u> </u>
	29.0' PRE-INSTALLATION	29.0 –	= [?]	<u> </u>
- - 30	29.0 PRE-INSTALLATION _		#00 N SANDPAC	< -
Ē]			[
_ - 32] =		2"ø SCHEDULE	-
-	<u> </u>		40 PVC SCREEN 一説 W/ #01 SLOT	* MEASUREMENTS REFERENCED FROM
E 34 444 A]			GROUND SURFACE AS OF DATE OF
411.6		34.4 –	SUMP	INSTALLATION (05/29/14).
E 34.4	= = = = = = = = = = = = = = = = = = = =			EL
E	EOB @ 34.4 FT. BGS			WELL DEVELOPMENT NOTES
‡	=			DATE DEVELOPED: N/A
E] =	1		DEVELOPMENT METHOD: N/A
ţ.]			<u>,</u>
F]	1		VOLUME PURGED: N/A
E	- -			FOR FURTHER DETAILS SEE
ļ-	<u> </u>	•		ACCOMPANYING WELL DEVELOPMENT
F	-			FIELD RECORD

	YPE: 8" Ø HOLLOW STEM AUGER LOCATION: SOUTHW	EST CORNER LANDF	LLL			
EOLOG	ST/ENGINEER: DAVE BLACK GROUND ELEVATION: 442.6	TOP OF PIPE	ELE	VATIO	N:	444.67
	PROFILE	MONITOR INSTALLATION	S	AMPL	E	PENETRATIO
DEPTH (FI FVATION)	STRATIGRAPHY DESCRIPTION & REMARKS		NUMBER	TYPE	BLOWS / FOOT	TEST BLOWS / FOO
445	-	Protective Casing w/ Locking cap 444.67			2	
	Red clayey silt, some rock fragments, fine gravel, and root fibers	442.6	1	ss	25	
	- Rock fragments				91	
40	- Soft rock fragments, some red clayey silt, pebbles, trace root fibers	2 2 3 4 5 2 2 2 2 2 2 2 2 2 2 2 2 3 2 3 2 3 3 2 3 3 3 3 2 3	3	ss	77 28 28	
35	No recovery	Grout	4	SS	36 38	
	Rock fragments, some red clayey silty sand		5	SS	44 97	
30	Dense grey siltstone, layered, greenish Auger refusal Light grey sandstone, medium grained Grey interbedded shale and dolomite/limestone - fissile to thin bedded - highly fractured (vertical and horizontal) - hematitic staining on fractured faces	\$555 430.6 _%	6	SS	28 100+	
25	Increasing dolomite beds	Benton- ite Plug				
	Grey dolomite/limestone, aphanitic - thin bedded, highly fractured - hematitic and MnO staining on fractures	Sand Pack				
20	Greenish grey to buff interbedded siltstone and sandstone, aphanitic to fine grained - thin to medium beds - frequent fractures along horizontal parting planes and some vertical fractures - some MnO staining - allochthonous sandstone fragments					
15	Grey shale, moderately soft interbedded with moderately hard buff sandstone	2" PVC				
	Buff sandstone moderately hard interbedded with grey moderately soft shale (thin beds)					

_	F/ENGINEER:	MONITOR	_	AMPL	_	PENETRATIO
DEPTH (ELEVATION)	STRATIGRAPHY DESCRIPTION & REMARKS	INSTALLATION	NUMBER	TYPE	BLOWS / FOOT	TEST BLOWS / FOO
410 -	grey moderately soft shale (thin beds)	Sand Pack			8	
400 -	Buff sandstone moderately hard, massive WHIRLPOOL-QUEENSTON interface (olive green) Red shale moderately soft - thin bedded - green shale interbed	398.7 397.2				
		7				

	PROFILE	MONITOR			_	- Newscale	
DEPTH (ELEVATION)	STRATIGRAPHY DESCRIPTION & REMARKS	INSTALLATION	NUMBER	TYPE	BLOWS / FOOT	BLOW	TRATI
455 - 450 - 445 - 4	Red silt, rock fragments Trace unknown green material Red silt, rock fragments, dark oily appearance to soils, some fine sand and cinders throughout Greenish rock fragments (sandstone) Red silt and greenish sandstone fragments having some red staining Same - less sandstone fragments Red-brown clayey silt with grey and yellow-green mottling, some rock fragments Auger refusal Dark red-brown sandstone, fine grained, well cemented, highly fractured Green-grey shale, fine grained - sandstone interbeds - many horizontal fractures - some vertical fractures	Protective Steel Casing w/ Locking Cap 450.42 447.4 447.4 Bentonite Plug PVC Sand Pack 5' PVC Screen	1 2 3 4 5 6 7	SS SS SS SS SS	44 33 17 49 12 30 16 53 69 35 74 100+		

	ENGINEER: DAVE BLACK GROUND ELEVATION: 444.7		E ELE	VATIO	N:	447.52
OEPTH (ELEVATION)	PROFILE STRATIGRAPHY DESCRIPTION & REMARKS	MONITOR INSTALLATION	NUMBER	TYPE	BLOWS / FOOT	PENETRAT TEST BLOWS / FC
45 - 40	Red silty clayey sand, medium grained, some angular rock fragments, some green slag, trace black deposits Red sandy silt, some angular rock fragments, lime green slag at 4.0 feet Brown sandy silt, trace of angular rock fragments and green slag Red sandy silt, some angular rock fragments, dark oily deposits and trace of wood fragments Rock fragments	447.5 2" Ø Black Steel Pipe 444.7 Grout Bento: ite Plug Screet 436.1	1 2 3 4	SS	100+ 55 55 75 100 24 58 100+	



McINTOSH & McINTOSH, P.C.

CONSULTING ENGINEERS, LAND SURVEYORS, PLANNERS

NEW YORK . MAINE . PENNSYLVANIA . VERMONT . CONNECTICUT NEW HAMPSHIRE . KENTUCKY . OHIO . SOUTH CAROLINA . ARIZONA NORTH CAROLINA . WEST VIRGINIA . RHODE ISLAND MASSACHUSETTS . NEW JERSEY

Principal Office. 429 Pine Street, P.O Box 490 Lockport, New York 14095 716 - 433-2535 BUFFALO, N Y

716 - 434-9138

625-8350

FAX # 716-433-2627

Van De Mark Chemical Co., Inc. One North Transit Road Lockport, NY 14094

23716 433 2827

Attention: Mr. Joe Venturo

Re: Measured Elevations on Landfill

Wells VOM 9, 10 and 11

1983 as-built (before capping) L'elevertions

Well No.	Top of PVC Pipe	(Published)	Ground Elev.	(Published)
9	447,37	(447.22)	445.0	(444.3)
10	444.89	(444_67)	443.1	(442.6)
11	450.74	(450,42)	448.55	(447.4)
Check Wells:		4 higher		
12	451.52	(447.52)	450.4	(444.7)
D-55	469.45	(469.36)	467.45	(467.4)

NOTE:

Elevations based on BM1 - top conc. wall s.w. corner ruins elev. 454.02 as shown on map of Van De Mark Chemical Co., Inc., Dwg. No. VDM 1966 by William W. Whitmore, P.E. P.C., datum unknown.

Meneural By: L. Zimpfin

Project No: 0155-002-100

Borehole Number: VDM-14R

Project: Vandamark Replacement well

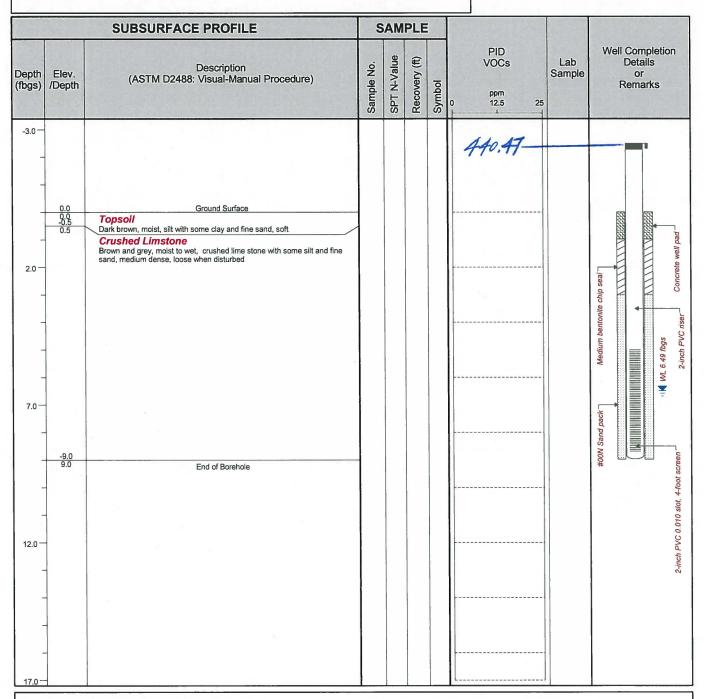
Client: Vandamark Chemical, Inc.
Site Location: Vandamark Landfill

Logged By: TAB

Checked By: BCH



Benchmark Environmental Engineering & Science, PLLC 726 Exchange Street, Suite 624 Buffalo, NY (716) 856-0599



Drilled By: Earth Dimensions, Inc. Drill Rig Type: CME 550 ATV Rig Drill Method: Overdrill and replace

Drill Date(s): 09/16/08

Hole Size: Stick-up: 3.0 feet Datum: NA

Sheet: 1 of 1

ATTACHMENT B CME Checklist

	Comprehensive Groundwater Monitoring Evaluation	Y/N
I.	Office Evaluation Technical Evaluation of the Design of the Groundwater Monitoring System	
A.	Review of Relevant Documents	
1.	What documents were obtained prior to conducting the inspection: RCRA Part A permit application RCRA Part B permit application Correspondence between the owner/operator and appropriate agencies or citizen's groups Previously conducted facility inspection/investigation reports Facility's contractor reports (Annual Periodic Review Reports) Regional hydrogeologic, geologic, or soil reports The facility's Sampling and Analysis Plan Groundwater Assessment Program Outline (or Plan, if the facility is in assessment monitoring) Other (specify): Site Management Plan (2015)	Yes
В.	Evaluation of the Owner/Operator's Hydrogeologic Assessment	
1.	Did the owner/operator use the following direct techniques in the hydrogeologic assessment: \[\subseteq \text{Logs of the soil borings/rock corings (documented by a professional geologist, scientist, or geotechnical engineer) \[\subseteq \text{Materials tests (e.g., grain size analyses, standard penetration tests, etc.)} \[\subseteq \text{Piezometer installation for water level measurements at different depths} \[\subseteq \text{Slug tests} \[\subseteq \text{Pressure tests} \] \[\subseteq \text{Geochemical analyses of soil samples} \[\subseteq \text{Other (specify) (e.g., hydrochemical diagrams, wash analysis):} \]	Yes

	Comprehensive Groundwater Monitoring Evaluation	Y/N
2.	Did the owner/operator use the following indirect technique to supplement direct techniques data: Geophysical well logs Tracer studies Resistivity and/or electromagnetic conductance Seismic survey Hydraulic conductivity measurements of cores Aerial photography Ground penetrating radar Other (specify):	No
3.	Did the owner/operator document and present the raw data from the site hydrogeologic assessment? Some	Some
4.	Did the owner/operator document methods (criteria) used to correlate and analyze the information? Some	Some
5.	Did the owner/operator prepare the following: Narrative description of geology Geologic cross sections Geologic and soil maps Boring/coring logs Structure contour maps of the differing water bearing zones and confining layer Narrative description and calculation of groundwater flows Water table/potentiometric map Hydrologic cross sections	Yes
6.	Did the owner/operator obtain a regional map of the area and delineate the facility? On regional topographic map and aerial photos If yes, does the site map show: Surficial geology features Streams, rivers, lakes, or wetlands near the facility Discharging or recharging wells near the facility	Yes
7.	Did the owner/operator obtain a regional hydrogeologic map? No If yes, does this hydrogeologic map indicate: Major areas of recharge/discharge Regional groundwater flow direction Potentiometric contours which are consistent with observed water level elevations	No

	Co	omprehensive Groundwater Monitoring Evaluation	Y/N
8.	If yes ⊠Re ∑Aı	he owner/operator prepare a facility site map? Yes s, does the site map show: egulated units of the facility (e.g., landfill areas, impoundments) ny seeps, springs, streams, ponds, or wetlands ocation of monitoring wells, soil borings, or test pits	Yes
9.	If mo	many regulated units does the facility have? 1 ore than one regulated unit then, oes the waste management area encompass all regulated units? a waste management area delineated for each regulated unit?	Yes
C.	Chai	racterization of Subsurface Geology of Site	
1.	Soil l	boring/test pit program:	
	a.	Were the soil borings/test pits performed under the supervision of a qualified professional? Yes	Yes
	b.	Did the owner/operator provide documentation for selecting the spacing for borings? Some	Yes
	c.	Were the borings drilled to the depth of the first confining unit below the uppermost zone of saturation or ten feet into bedrock?	Yes
	d.	Indicate the method(s) of drilling:	Yes
	e.	Were continuous sample cores taken? Some	Yes
	f.	How were the samples obtained (checked method(s)) Split spoon Shelby tube, or similar Rock coring Ditch sampling Other (explain):	Yes
	g.	Were the continuous sample cores logged by a qualified professional in geology? Yes	Yes

Comprehensive Groundwater Monitoring Evaluation		
stru cha	es the field boring log include the following information: Hole name/number Date started and finished Driller's name Hole location (i.e., map and elevation) Drill rig type and bit/auger size Gross petrography (e.g., rock type) of each geologic unit Gross mineralogy of each geologic unit Gross structural interpretation of each geologic unit and actural features (e.g., fractures, gouge material, solution annels, buried streams or valleys, identification of depositional terial) Development of soil zones and vertical extent and description soil type Depth of water bearing unit(s) and vertical extent of each Depth and reason for termination of borehole Depth and location of any contaminant encountered in borehole Sample location/number Percent sample recovery Narrative descriptions of: Geologic observations Drilling observations	Variously
san	ere the following analytical tests performed on the core inples: Mineralogy (e.g., microscopic tests and x-ray diffraction) Petrographic analysis: Degree of crystallinity and cementation of matrix Degree of sorting, size fraction (i.e., sieving), textural variations Rock type(s) Soil type Approximate bulk geochemistry Existence of microstructures that may affect or indicate fluid flow Falling head tests Static head tests Settling measurements Centrifuge tests Column drawings	No

	Comprehensive Groundwater Monitoring Evaluation	Y/N
D.	Verification of Subsurface Geological Data	
1.	Has the owner/operator used indirect geophysical methods to supplement geological conditions between borehole locations? No	No
2.	Do the number of borings and analytical data indicate that the confining layer displays a low enough permeability to impede the migration of contaminants to any stratigraphically lower water-bearing units? Yes	Yes
3.	Is the confining layer laterally continuous across the entire site? Yes	Yes
4.	Did the owner/operator consider the chemical compatibility of the site-specific waste types and the geologic materials of the confining layer? No	No
5.	Did the geologic assessment address or provide means for resolution of any information gaps of geologic data? Yes	Yes
6.	Do the laboratory data corroborate the field data for petrography?	NA
7.	Do the laboratory data corroborate the field data for mineralogy and subsurface geochemistry?	NA
Е.	Presentation of Geologic Data	
1.	Did the owner/operator present geologic cross sections of the site?	Yes
2.	Do cross sections: Identify the types and characteristics of the geologic materials present Define the contact zones between different geologic materials Note the zones of high permeability or fracture Give detailed borehole information including: Location of borehole Depth of termination Location of screen (if applicable) Depth of zone(s) of saturation Backfill procedure	Yes
3.	Did the owner/operator provide a topographic map which was constructed by a licensed surveyor? Yes	Yes

	Co	omprehensive Groundwater Monitoring Evaluation	Y/N
4.	Complete Com	the topographic map provide: ontours at a maximum interval of two feet ocations and illustrations of man-made features (e.g., parking lots, ry buildings, drainage ditches, storm drain, pipelines, etc.) escriptions of nearby water bodies escriptions of off-site wells the boundaries dividual RCRA units elineation of the waste management area(s) tell and boring locations	Yes (unchecked information provided on separate figures)
5.		he owner/operator provide an aerial photograph depicting the site djacent off-site features? Yes	Yes
6.		Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labeled? Yes	
F.	Ident	ification of Groundwater Flow Paths	
1.	Grou	Groundwater flow direction	
	a.	Was the well casing height measured by a licensed surveyor to the nearest 0.01 feet? Yes	Yes
	b.	Were the well water level measurements taken within a 24 hour period? Yes	Yes
	c.	Were the well water level measurements taken to the nearest 0.01 feet? Yes	Yes
	d.	Were the well water levels allowed to stabilize after construction and development for a minimum of 24 hours prior to measurements? Yes	Yes
	e.	Was the water level information obtained from (check appropriate one): Multiple piezometers placed in single borehole Vertically nested piezometers in closely spaced separate boreholes (only for Somerset Railroad wells) Monitoring wells	Yes
	f.	Did the owner/operator provide construction details for the piezometers?	Yes

Со	mprehensive Groundwater Monitoring Evaluation	Y/N
g.	How were the static water levels measured (check method(s)). Electric water sounder Wetted tape Air line Other (explain):	Yes
h.	Was the well water level measured in wells with equivalent screened intervals at an equivalent depth below the saturated zone? Yes	Yes
i.	Has the owner/operator provided a site water table (potentiometric) contour map? Yes	Yes
	• Do the potentiometric contours appear logical and accurate based on topography and presented data? Yes	Yes
	• Are groundwater flow lines indicated? Yes	Yes
	• Are static water levels shown? Yes	Yes
	• Can hydraulic gradients be estimated? Yes	Yes
j.	Did the owner/operator develop hydrologic cross sections of the vertical flow component across the site using measurements from all wells? No	No
k.	Do the owner/operator's flow nets include: Piezometer locations Depth of screening Width of screening Measurements of water levels from all wells and piezometers	NA

	Co	omprehensive Groundwater Monitoring Evaluation	Y/N
2.	2. Seasonal and temporal fluctuations in groundwater:		
	a.	Do fluctuations in static water levels occur? If yes, are the fluctuations caused by any of the following: Off-site well pumping Tidal processes or other intermittent natural variations (e.g., river stage, etc.) On-site well pumping Off-site, on-site construction or changing land use patterns Deep well injection Seasonal variations Other (specify):	Not significantly
	b.	Has the owner/operator documented sources and patterns that contribute to or affect the groundwater patterns below the waste management? No	No
	c.	Do water level fluctuations alter the general groundwater gradients and flow directions? No	No
	d.	Based on water level data, do any head differentials occur that may indicate a vertical flow component in the saturated zone? Not evaluated extensively on site	Unknown
	e.	Did the owner/operator implement means for gauging long-term effects on water movement that may result from on-site or off-site construction or changes in land-use patterns? No	No
3.	Hydr	raulic conductivity:	
	a.	How were hydraulic conductivities of the subsurface materials determined? Single-well tests (packer & slug tests) Multiple-well tests (pump tests) Other (specify):	Yes
	b.	If single-well tests were conducted, was it done by:	Both
	c.	If single well tests were conducted in a highly permeable formation, were pressure transducers and high-speed recording equipment used to record the rapidly changing water levels? No	No

	Co	mprehensive Groundwater Monitoring Evaluation	Y/N
	d.	Since single well tests only measure hydraulic conductivity in a limited area, were enough tests run to ensure a representative measure of conductivity in each hydrogeologic unit? Yes	Yes
	e.	Is the owner/operator's slug test data (if applicable) consistent with existing geologic information (e.g., boring logs)? Yes	Yes
	f.	Were other hydraulic conductivity properties determined? If yes, provide any of the following data, if available: Transmissivity Storage coefficient Leakage Permeability Porosity Specific capacity	Yes
		Other (specify): Groundwater flux calculations	
4.	Identi	fication of the uppermost aquifer: Overburden/Grimsby/Power Glen	
	a.	Has the extent of the uppermost saturated zone (aquifer) in the facility area been defined? If yes,	Yes
		• Are soil boring/test pit logs included? Yes	Yes
		Are geologic cross-sections included? Yes	Yes
	b.	Is there evidence of confining (competent, unfractured, continuous, and low permeability) layers beneath the site? Yes, Queenston Fm. If yes, How was continuity demonstrated? Borings/literature	Yes
	c.	What is hydraulic conductivity of the confining unit (if present)? Variable - 10^{-4} to < 10^{-7} cm/sec	Variable
		How was it determined? Packer testing/literature	
	d.	Does potential for other hydraulic communication exist (e.g., lateral discontinuity between geologic units, facies changes, fracture zones, cross cutting structures, or chemical corrosion/alteration of geologic units by leachage)? If yes or no, what is the rationale? Well sandpacks	Possible

Comprehensive Groundwater Monitoring Evaluation		
G. Office Evaluation of the Facility's Groundwater Monitoring System Monitoring Well Design and Construction:		
These questions should be answered for each different well design present facility.	t at the	
1. Drilling Methods:		
a. What drilling methods were used for the wells? Hollow-stem auger Solid-stem auger Mud rotary Air rotary Reverse rotary Cable tool Jetting Air drill w/ casing hammer Other (specify):	Yes	
 b. Were any cutting fluids (including water) or additives used drilling? If yes, specify: Type of drilling fluid: water Source of water used: unknown Foam Polymers Other 	during Yes	
c. Was the cutting fluid, or additive, identified? Water	Yes	
d. Was the drilling equipment steam-cleaned prior to drilling well?Other methods	the	
e. Was compressed air used during drilling? If yes,• Was the air filtered to remove oil? unknown	Yes	
 f. Did the owner/operator document procedure for establishin potentiometric surface? If yes, How was the location established? 	ng the No	

	Co	omprehensive Groundwater Monitoring Evaluation	Y/N
	g.	Formation samples	
		• Were formation samples collected initially during drilling?	Yes
		• Were any cores taken continuous?	Yes
		• If not, at what interval were samples taken? Variable	Also variable
		 How were the samples obtained? Split spoon Shelby tube Core drill Other (specify): 	Various methods
		 Identify if any physical and/or chemical tests were performed on the formation samples (specify): various, data provided in numerous historical reports 	Yes
2.	Moni	toring Well Construction Materials (see attached logs)	
	a.	Identify construction materials (by number) and diameters (ID/OD)	See logs
		<u>Material</u> <u>Diameter</u>	See logs
		 Primary Casing Secondary or outside casing (double construction) 	
		• Screen PVC 2"	
	b.	How are the sections of casing and screen connected? ☐ Pipe sections threaded ☐ Couplings (friction) with adhesive or solvent ☐ Couplings (friction) with retainer screws ☐ Other (specify):	Threaded
	c.	Were the materials steam-cleaned prior to installation?If no, how were the materials cleaned? Unknown	3
3.	Well	Intake Design and Well Development	
	a.	Were well intake screens installed?	Yes
		• What are the length of the screens for the wells? 5' & 10'	5' & 10'

	Cor	mprehensive Groundwater Monitoring Evaluation	Y/N
		• Is the screen manufactured? Yes, machine slotted	Yes
	b.	Was a filter pack installed?	Yes
		• What kind of filter pack was employed? Silica sand	Yes
		• Is the filter pack compatible with formation materials?	Yes
		How was the filter pack installed? Poured in HSA/casing	Yes
		What are the dimensions of the filter pack? Variable	See logs
		Has a turbidity measurement of the well water ever been made? Yes, during development and sampling	Yes
		Have the filter pack and screen been designed for the in situ materials? Yes	Yes
	c.	Well development	
		• Were the wells developed? Yes	Yes
		 What technique was used for well development? Surge block Bailer (in 1983, 3 well volumes for 3 days) Air surging Water pumping Other (specify): 	Bailer well develop- ment
4.	Annula	ar Space Seals	
	a.	What is the annular space in the saturated zone directly above the filter pack filled with: Sodium bentonite (generally granular; chips used for VDM-9R) Cement (specify neat or concrete) Other (specify):	Yes

	Co	omprehensive Groundwater Monitoring Evaluation	Y/N
	b.	Was the seal installed by: Dropping material down the hole and tamping Dropping material down the inside of hollow-stem auger Tremie pipe method Other (specify):	Poured down HSA/ casing
	c.	Was a different seal used in the unsaturated zone? If yes,	Yes
		 Was this seal made with Sodium bentonite Cement-bentonite grout (above bentonite seal to surface) Other (specify): 	Yes
		 Was this seal installed by □ Dropping material down the hole and tamping ☑ Dropping material down the inside of hollow stem auger □ Other (specify): 	Poured down HSA
	d.	Is the upper portion of the borehole sealed with a concrete cap to prevent infiltration from the surface? Yes	Yes
	e.	Is the well fitted with an above-ground protective device and bumper guards? Steel stick-up protective casings, but no bumper guards	Yes
	f.	Has the protective cover been installed with locks to prevent tampering? Yes	Yes
Н.	Eval	uation of the Facility's Detection Monitoring Program	
1.	Place	ement of Downgradient Detection Monitoring Wells:	
	a.	Are the groundwater monitoring wells or clusters located immediately adjacent to the waste management area? Yes	Yes
	b.	How far apart are the detection monitoring wells? ~150'	~150′

	Co	omprehensive Groundwater Monitoring Evaluation	Y/N
	c.	Does the owner/operator provide a rationale for the location of each monitoring well or cluster? Yes	Yes
	d.	Does the owner/operator identify the well screen lengths of each monitoring well or clusters? Yes	Yes
	e.	Does the owner/operator provide an explanation for the well screen lengths of each monitoring well or cluster? Yes	Yes
	f.	Do the actual locations of monitoring wells or clusters correspond to those identified by the owner/operator? Yes	Yes
2.	Place	ment of Upgradient Monitoring Wells:	
	a.	Has the owner/operator documented the location of each upgradient monitoring well or cluster? Yes	Yes
	b.	Does the owner/operator provide an explanation for the location(s) of the upgradient monitoring well(s)? Yes	Yes
	c.	What length screen has the owner/operator employed in the background monitoring well(s)? 10'	10'
	d.	Does the owner/operator provide an explanation for the screen length(s) chosen? Installed by others	No
	e.	Does the actual location of each background monitoring well or cluster correspond to that identified by the owner/operator? Yes	Yes
I.	Offic	e Evaluation of the Facility's Assessment Monitoring Program	
1.	site (1988	the assessment plan specify: Assessment activities for the were performed in the 1980s and 1990s; Landfill closure in ; Post-closure monitoring under Part 373 RCRA Permit I 2013) and Order on Consent/SMP (since 2014 to present)	
	a.	The number, location, and depth of wells? Yes	Yes
	b.	The rationale for their placement and identify the basis that will be used to select subsequent sampling locations and depths in later assessment phases? Yes	Yes

	Co	omprehensive Groundwater Monitoring Evaluation	Y/N
2.	const comp	the list of monitoring parameters include all hazardous waste ituents from the facility? No; carbon tetrachloride, PFAS bounds, and 1,4-dioxane probably need to be added to SMP analyte list	No
	a.	Does the water quality parameter list include other important indicators not classified as hazardous waste constituents? Some	Yes
	b.	Does the owner/operator provide documentation for the listed wastes which are not included? NA	NA
3.		the owner/operator's assessment plan specify the procedures to be to determine the rate of constituent migration in the groundwater?	NA
4.		he owner/operator specified a schedule of implementation in the sment plan? Yes	Yes
5.		the assessment monitoring objectives been clearly defined in the sment plan? Yes	Yes
	a.	Did the plan include analysis and/or re-evaluation to determine if significant contamination has occurred in any of the detection monitoring wells? Yes	Yes
	b.	Did the plan provide for a comprehensive program of investigation to fully characterize the rate and extent of contaminant migration from the facility? Yes	Yes
	c.	Did the plan call for determining the concentrations of hazardous wastes and hazardous waste constituents in the ground water? Yes	Yes
	d.	Did the plan employ a quarterly monitoring program? Yes; over time, the sampling frequency was reduced to semiannual, and then to annual (2015), then to biannual (after 2024)	Yes (initially)
6.		he assessment plan identify the investigatory methods that were used assessment phase? Yes	Yes
	a.	Is the role of each method in the evaluation fully described? Yes	Yes
	b.	Does the plan provide sufficient descriptions of the direct methods to be used? Yes	Yes

	C	omprehensive Groundwater Monitoring Evaluation	Y/N
	c.	Did the plan provide sufficient descriptions of the indirect methods to be used? None used	NA
	d.	Will the method contribute to the further characterization of the contaminant movement?	NA
7.		e the investigatory techniques utilized in the assessment program d on direct methods? Yes	Yes
	a.	Does the assessment approach incorporate indirect methods to further support direct methods? No	No
	b.	Did the planned methods called for in the assessment approach ultimately meet performance standards for assessment monitoring? Yes	Yes
	c.	Were the procedures well defined? Yes	Yes
	d.	Did the approach provide for monitoring wells similar in design and construction as the detection monitoring wells? Yes	Yes
	e.	Did the approach employ taking samples during drilling or collecting core samples for further analysis? Yes	Yes
8.		the indirect methods to be used based on reliable and accepted hysical techniques?	NA
	a.	Are they capable of detecting subsurface changes resulting from contaminant migration at the site?	NA
	b.	Is the measurement at an appropriate level of sensitivity to detect groundwater quality changes at the site?	NA
	c.	Is the method appropriate considering the nature of the subsurface materials?	NA
	d.	Does the approach consider the limitations of these methods?	NA
	e.	Will the extent of contamination and constituent concentration be based on direct methods and sound engineering judgment? (Using indirect methods to further substantiate the findings.) Sampling	Yes

	Co	omprehensive Groundwater Monitoring Evaluation	Y/N
9.		he assessment approach incorporate any mathematical modeling to ct contaminant movement? Post-closure modeling performed	No
	a.	Were site specific measurements utilized to accurately portray the subsurface?	Some
	b.	Was the derived data reliable?	Yes
	c.	Were the assumptions identified?	Yes
	d.	Have the physical and chemical properties of the site-specific wastes and hazardous waste constituents been identified? Yes	Yes
J.	Conc	clusions	
1.	Subs	urface geology	
	a.	Has sufficient data been collected to adequately define petrography and petrographic variation? Yes	Yes
	b.	Has the subsurface geochemistry been adequately defined? Yes	Yes
	c.	Was the boring/coring program adequate to define subsurface geologic variation? Yes	Yes
	d.	Was the owner/operator's narrative description complete and accurate in its interpretation of the data? Yes	Yes
	e.	Does the geologic assessment address or provide means to resolve any information gaps? Yes	Yes
2.	Grou	ndwater flow paths	
	a.	Did the owner/operator adequately establish the horizontal and vertical components of groundwater flow? Yes	Yes
	b.	Were appropriate methods used to establish groundwater flow paths? Yes	Yes
	c.	Did the owner/operator provide accurate documentation? Yes	Yes
	d.	Are the potentiometric surface measurements valid? Yes	Yes

	C	omprehensive Groundwater Monitoring Evaluation	Y/N
	e.	Did the owner/operator adequately consider the seasonal and temporal effects on the groundwater? During initial quarterly sampling	Yes
	f.	Were sufficient hydraulic conductivity tests performed to document lateral and vertical variation in hydraulic conductivity in the entire hydrogeologic subsurface below the site? Yes	Yes
3.	Uppe	ermost Aquifer	
	a.	Did the owner/operator adequately define the uppermost aquifer?	Yes
4.	Mon	itoring Well Construction and Design	
	a.	Do the design and construction of the owner/operator's groundwater monitoring wells permit depth discrete groundwater samples to be taken? Yes	Yes
	b.	Are the samples representative of groundwater quality? Yes	Yes
	c.	Are the groundwater monitoring wells structurally stable? Yes	Yes
	d.	Does the groundwater monitoring well's design and construction permit an accurate assessment of aquifer characteristics? Yes	Yes
5.	Dete	ection Monitoring	
	a.	 Downgradient Wells Do the location, and screen lengths of the groundwater monitoring wells or clusters in the detection monitoring system allow the immediate detection of a release of hazardous waste or constituents from the hazardous waste management area to the uppermost aquifer? Yes 	Yes
	b.	 Upgradient Wells Do the locations and screen lengths of the upgradient (background) groundwater monitoring wells ensure the capability of collecting groundwater samples representative of upgradient (background) groundwater quality including any ambient heterogenous chemical characteristics? Yes 	Yes

	Co	omprehensive Groundwater Monitoring Evaluation	Y/N
6.	Asse	ssment Monitoring	
	a.	Has the owner/operator adequately characterized site hydrogeology to determine contaminant migration? Yes	Yes
	b.	Is the detection monitoring system adequately designed and constructed to immediately detect any contaminant release? Yes	Yes
	c.	Are the procedures used to make a first determination of contamination adequate? NA	NA
	d.	Is the assessment plan adequate to detect, characterize, and track contaminant migration? Yes	Yes
	e.	Will the assessment monitoring wells, given site hydrogeologic conditions, define the extent and concentration of contamination in the horizontal and vertical planes? Yes	Yes
	f.	Are the assessment monitoring wells adequately designed and constructed? Yes	Yes
	g.	Are the sampling and analysis procedures adequate to provide true measures of contamination? Yes	Yes
	h.	Do the procedures used for evaluation of assessment monitoring data result in determinations of the rate of migration, extent of migration, and hazardous constituent composition of the contaminant plume? Yes	Yes
	i.	Are the data collected at sufficient frequency and duration to adequately determine the rate of migration? Yes	Yes
	j.	Is the schedule of implementation adequate? Yes	Yes
	k.	Is the owner/operator's assessment monitoring plan adequate? The SMP should be updated to include carbon tetrachloride, PFAS compounds, and 1,4-dioxane in the analyte list	Needs updating
	1.	If the owner/operator had to implement his assessment monitoring plan, was it implemented satisfactorily? NA	NA

	Comprehensive Groundwater Monitoring Evaluation	Y/N
II. 20	Field Evaluation (inspection performed on August 12 and 13, 24 during annual groundwater/surface water sampling event)	
A.	Groundwater Monitoring System	
1.	Are the numbers, depths, and locations of monitoring wells in agreement with those reported in the facility's monitoring plan (SMP, 2015)?	Yes
В.	Monitoring Well Construction	
1.	Identify construction material and diameter	See Logs
	 a. Primary casing: 2" PVC b. Secondary or outside casing: see attached well construction logs 	& Photos
2.	Are the upper portions of the boreholes sealed with concrete to prevent infiltration from the surface?	Yes
3.	Are the wells fitted with above-ground protective device?	Yes
4.	Are the protective covers fitted with locks to prevent tampering? Yes If a facility utilizes more than a single well design, answer the above questions for each well design? NA	Yes
III.	Review of Sample Collection Procedures	
A.	Measurement of Well Depths /Elevation	
1.	Are measurements of both depth to standing water and depth to the bottom of the well made?	Yes
2.	Are measurements taken to the 0.01 feet?	Yes
3.	What device is used? Electronic water level indicator	Yes
4.	Is there a reference point established by a licensed surveyor? Notches on well riser	Yes

	Comprehensive Groundwater Monitoring Evaluation	Y/N
5.	Is the measuring equipment properly cleaned between well locations to prevent cross contamination?	Yes
В.	Detection of Immiscible Layers	
1.	Are procedures used which will detect light phase immiscible layers? No, NAPLs have never been detected at the site historically nor was disposal of NAPLS suspected or documented at the site	No
2.	Are procedures used which will detect heavy phase immiscible layers?	NA
C.	Sampling of Immiscible Layers	N14
1.	Are the immiscible layers sampled separately prior to well evacuation?	NA
2.	Do the procedures used minimize mixing with water soluble phases?	NA
D.	Well Evacuation	
1.	Are low yielding wells evacuated to dryness?	Yes
2.	Are high-yielding wells evacuated so that at least three casing volumes are removed?	Yes
3.	What device is used to evacuate the wells? Dedicated HDPE bailers	Bailers
4.	If any problems are encountered (e.g., equipment malfunction) are they noted in a field logbook? On field forms	Yes
E.	Sample Withdrawal	
1.	For low yielding wells, are samples for volatiles, pH, and oxidation/reduction potential drawn first after the well recovers? ORP is not on the parameter list	Yes
2.	Are samples withdrawn with either fluorocarbon/resin or stainless steel (316, 304 or 2205) sampling devices? Dedicated HDPE bailers (fluorocarbon/resin bailers are no longer acceptable)	No
3.	Are sampling devices either <u>bottom-valve bailers</u> or positive gas displacement bladder pumps?	Yes

	Comprehensive Groundwater Monitoring Evaluation	Y/N		
4.	If bailers are used, is fluorocarbon/resin coated wire, single strand stainless steel wire, or monofilament used to raise and lower the bailer? Masons twine is used (fluorocarbon/resin coated wire is no longer acceptable)			
5.	If bladder pumps are used, are they operated in continuous manner to prevent aeration of the sample?			
6.	If bailers are used, are they lowered slowly to prevent degassing of the water?	Yes		
7.	If bailers are used, are the contents transferred to the sample container in a way that minimizes agitation and aeration?			
8.	Is care taken to avoid placing clean sampling equipment on the ground or other contaminated surfaces prior to insertion into the well?	Yes		
9.	If dedicated sampling equipment is not used, is equipment disassembled and thoroughly cleaned between samples? Dedicated sampling equipment			
10.	If samples are for inorganic analysis, does the cleaning procedure include the following sequential steps: Dedicated sampling equipment Dilute acid rinse (HNO ₃ or HC1)	NA		
11.	If samples are for organic analysis, does the cleaning procedure include the following sequential steps: Dedicated sampling equipment Nonphosphate detergent wash Tap water rinse Distilled/deionized water rinse Acetone rinse Pesticide-grade hexane rinse	NA		
12.	Is sampling equipment thoroughly dry before use?	NA		
13.	Are equipment blanks taken to ensure that sample cross-contamination has not occurred?	No		
14.	If volatile samples are taken with a positive gas displacement bladder pump, are pumping rates below 100 ml/min?	NA		

Comprehensive Groundwater Monitoring Evaluation		
F. 1.	In-situ or Field Analyses Are the following labile (chemically unstable) parameters determined in the field: pH is the only required field parameter pH Temperature Specific conductivity Redox potential Chlorine Dissolved oxygen Turbidity Other (specify):	Yes
2.	For in-situ determinations, are they made after well evacuation and sample removal?	Yes
3.	If sample is withdrawn from the well, is parameter measured from a split portion?	Yes
4.	Is monitoring equipment calibrated according to manufacturers' specifications and consistent with SW-846?	Yes
5.	Are the date, procedure, and maintenance for equipment calibration documented in the field logbook? On field data sheets	
IV.	Review of Sample Preservation and Handling Procedures	
A.	Sample Containers	
1.	Are samples transferred from the sampling device directly to their compatible containers?	Yes
2.	Are sample containers for metals (inorganics) analyses polyethylene with polypropylene caps?	Yes
3.	Are sample containers for organics analysis glass bottles with fluorocarbon resin lined caps? For VOCs (not for PFAS analyses)	Yes
4.	If glass bottles are used for metals samples are the caps fluorocarbon resin-lined?	NA

Vanchlor Landfill - 600 Mill Street, Lockport, Niagara County, NY 14094 – Site #932039 Evaluator/Inspector: Steven Moeller (NYSDEC DER – Professional Geologist 1)

Comprehensive Groundwater Monitoring Evaluation				
5.	5. Are the sample containers for metal analyses cleaned using these sequential steps: Sample containers provided by the laboratory are pre-cleaned and pre-preserved Nonphosphate detergent wash 1:1 nitric acid rinse Tap water rinse 1:1 hydrochloric acid rinse Distilled/deionized water rinse			
6.	Are the sample containers for organic analyses cleaned using these sequential steps: Sample containers provided by the laboratory are pre-cleaned and pre-preserved Nonphosphate detergent/hot water wash Tap water rinse Distilled/deionized water rinse Acetone rinse Pesticide-grade hexane rinse	NA		
7.	7. Are trip blanks used for each sample container type to verify cleanliness? Trip Blanks in cooler (VOC analysis)			
B. 1.	Are samples for the following analyses cooled to 4°C: Yes VOCs (site-specific list) TOX Chloride Phenols Sulfate Nitrate Coliform bacteria Cyanide Oil and grease Hazardous constituents (261, Appendix VIII)	Yes		

Comprehensive Groundwater Monitoring Evaluation		
2.	Are samples for the following analyses field acidified to pH<2 with HNO ₃ : Iron Chromium Copper Zinc Dissolved metals Fluoride Endrin Lindane Methoxychlor Toxaphene 2,4-D 2,4,5-TP Silvex Radium Gross alpha Gross beta	Yes
3.	Are samples for the following analyses field acidified to pH<2 with H ₂ SO ₄ : Phenols Oil and grease	NA
4.	Is the sample for VOC analyses field acidified to pH <2 with HCl? Yes	Yes
5.	Is the sample for TOX analysis preserved with 1 ml of 1.1 M sodium sulfite?	NA
6.	Is the sample for cyanide analysis preserved with NaOH to pH >12?	NA
C.	Special Handling Considerations	
1.	Are organic samples handled without filtering?	Yes
2.	Are samples for volatile organics transferred to the appropriate vials to eliminate headspace over the sample?	Yes
3.	Are samples for metal analysis split into two portions? No, only unfiltered metals analyses are performed	No
4.	Is the sample for dissolved metals filtered through a 0.45 micron filter? No filtered samples	NA
5.	Is the second portion not filtered and analyzed for total metals?	NA

Comprehensive Groundwater Monitoring Evaluation			
6.	6. Is one equipment blank prepared each day of groundwater sampling? Not required by SMP		
V.	Review of Chain-of-Custody Procedures		
A.	Sample Labels		
1.	Are sample labels used?	Yes	
2.	Do they provide the following information: Sample identification number Name of collector Date and time of collection Place of collection Parameter(s) requested and preservatives used	Yes	
3.	Do they remain legible even if wet?	Yes	
В.	Sample Seals		
1.	Are sample seals placed on those containers to ensure samples are not altered? Samples are transported directly to the lab (Alpha Analytical) by the sampling crew (from Alpha Analytical)	No	
C.	Field Logbook		
1.	Is a field logbook maintained? Field forms are used	Yes	

Comprehensive Groundwater Monitoring Evaluation			
2. Does it document the following: Purpose of sampling (e.g., detection or assessment) - NA Location of well(s) Total depth of each well Static water level depth and measurement technique Presence of immiscible layers and detection method - NA Collection method for immiscible layers and sample identification numbers - NA XWell evacuation procedures Xsample withdrawal procedure Date and time of collection XWell sampling sequence Types of sample containers and sample identification number(s) Preservative(s) used Parameters requested Field analysis data and method(s) Sample distribution and transporter Field observations Unusual well recharge rates Equipment malfunction(s) Possible sample contamination Sampling rate		Some	
D. 1.			
2.	Does it document the following: Sample number Signature of collector Date and time of collection Sample type Station location Number of containers Parameters requested Signatures of persons involved in chain-of-custody Inclusive dates of custody	Yes	

Comprehensive Groundwater Monitoring Evaluation				
Е.	Sample Analysis Request Sheet			
1.	Does a sample analysis request sheet accompany samples? No, info is on \emph{COC}	No		
2.	Does the request sheet document the following: No, info is on COC Name of person receiving the sample Date of sample receipt Duplicates Analysis to be performed			
VI.	Review of Quality Assurance/Quality Control			
A.	Is the validity and reliability of the laboratory and field generated data ensured by a QA/QC program? Yes, Appendix F in SMP (QA/QC Plan)	Yes		
B.	Does the QA/QC program include:			
1.	Documentation of any deviation from approved procedures? Yes	Yes		
2.	Documentation of analytical results for: ☐Blanks ☐Standards ☐Duplicates ☐Spiked samples ☐Detectable limits for each parameter being analyzed			
C.	Are approved statistical methods used? Yes	Yes		
D.	Are QC samples used to correct data? Yes	Yes		
E.	Are all data critically examined to ensure it has been properly calculated and reported? Yes (mainly by lab)			
VII.	. Surficial Well Inspection and Field Observation			
A.	Are the wells adequately maintained?	Yes		
B.	Are the monitoring wells protected and secure?	Yes		
C.	Do the wells have surveyed casing elevations?	Yes		

Comprehensive Groundwater Monitoring Evaluation				
D.	Are the groundwater samples turbid?	Some		
E.	Have all physical characteristics of the site been noted in the inspector's field notes (i.e., surface waters, topography, surface features)?			
F.	Has a site sketch been prepared by the field inspector with scale, north arrow, locations of buildings, locations) of regulated units, locations of monitoring wells, and a rough depiction of the site drainage pattern? No, this information is already available on site maps, figures, and aerial photos			
VIII. Conclusions				
A.	Is the facility currently operating under the correct monitoring program according to the statistical analyses performed by the current operator? Yes	Yes		
В.	Does the groundwater monitoring system, as designed and operated, allow for detection or assessment of any possible groundwater contamination caused by the facility? Yes	Yes		
C.	Do the sampling and analysis procedures permit the owner/operator to detect and, where possible, assess the nature and extent of a release of hazardous constituents to ground water from the monitored hazardous waste management facility? Yes, but some modifications needed to SMP (as noted in previous comments above)	Yes		

ATTACHMENT C PHOTOGRAPHS



Southeastward view of gate to Mill Street access road.



North-northwestward view of the landfill access gate located in the northern portion of the perimeter fenceline. Note warning signage on fence.



Southward view of the recently mowed landfill surface, well VDM-12 in background.



Southeastward view of east side of landfill looking towards well VDM-14R.



West side of landfill looking north.



Fenceline on southern end of landfill looking west.



Wells VDM-9R (left) and VDM-10 (right).



Wells VDM-11 (left) and VDM-12 (right).



Wells VDM-14R (left) and D-55 (right).



Using a dedicated HDPE bailer to purge groundwater at well VDM-9R on August 12, 2024.



Groundwater sample collection at well VDM-14R on August 13, 2024.



Collecting the surface water sample from Eighteen Mile Creek with a sample dipper on August 13, 2024.

ATTACHMENT D WELL PURGING/SAMPLING LOGS

APPENDIX E

Attachment 1-A

Well Purging / Sampling Data

WELL D-55:	
WELL PURGING DATA:	DATE: 8/12/24
START TIME: 1048	FINISH TIME: 1100
A: MP ELEVATION: 468.76 FEET	
B: DEPTH TO WATER:	36.63 FEET
C: DEPTH OF WELL INSTALLED:	46.40 ft.
D: STATIC WATER LEVEL:	$C-D = \frac{9.77}{\text{FEET}}$
E: WELL VOLUME: E * 0.1636 =	1.60 GALLONS
F: DEPTH OF WELL AS MEASURED:	47.23 FEET
WELL SAMPLING DATA:	
DATE: 8/13/24	
START TIME: 11 02	FINISH TIME: 11 11
A: MP ELEVATION: 468.76 FEET	
B: DEPTH TO WATER:	36.63 FEET
C: DEPTH OF WELL INSTALLED:	46.40 ft.
D: STATIC WATER LEVEL:	$C-D = \frac{9.77}{\text{FEET}}$
E: WELL VOLUME: E * 0.1636 =	1.60 GALLONS
F: DEPTH OF WELL AS MEASURED:	47.23 FEET
G: pH OF SAMPLE:	7.29 pH @ 17.2°c
H: pH METER CALIBRATED?: YES	NO[]
I. SAMPLES ORTAINED:	
1- TOTAL METALS, 1 TOTAL CHLO	RIDES, 2 VOAs, 1,4 dioxane, 1633 PFAS
J: WEATHER CONDITIONS: Clar	Sunny
K: SAMPLER(S): Amber Flische	man, Nicholas Kibby, Kyle Wichter
1 5 a la avenda	d > day went toxbid during purge

L:

WELL VDM-9R:

WELL P	URGING DATA:	DATE: 8/12/24		
START	TIME: 947			FINISH TIME: 1000
A:	MP ELEVATION:	448.58 FEET		
B:	DEPTH TO WATER:			34.55FEET
C:	DEPTH OF WELL INST	ALLED:	37.35 ft.	
D:	STATIC WATER LEVE	L:	C-D =	
E:	WELL VOLUME:	E * 0.1636 =		0.46_GALLONS
F:	DEPTH OF WELL AS N	MEASURED:		39.15_FEET
	SAMPLING DATA:			
DATE:_	8/13/24			
START	TIME: 1000			FINISH TIME: 1008
A:	MP ELEVATION:	448.58 FEET		
B:	DEPTH TO WATER:			37.21_FEET
C:	DEPTH OF WELL INST	TALLED:	37.35 ft.	
D:	STATIC WATER LEVE	L:	C-D =	0.14_FEET
E:	WELL VOLUME:	E * 0.1636 =		O.O.Z_GALLONS
F:	DEPTH OF WELL AS	MEASURED:		39.15_FEET
G:	pH OF SAMPLE:			6.04 PH @ 17.4°C
H:	pH METER CALIBRAT	ED?: YES D	()	NO[]
1:	SAMPLES OBTAINED			
	1- TOTAL METALS, 1			
J:	WEATHER CONDITIO	NS: Clear,	Sunny	
K:	SAMPLER(S): Amb	er Fleischm	nan, Nicho	las Kibby, Kyle Nichter
L:	COMMENTS: 0.75	*Bailer an	d Fring r	Small Solids in purge water

WELL VDM-10:

WELL PURGING DATA:	DATE: 8/12/24					
START TIME: 933	FINISH TIME: 1003					
A: MP ELEVATION: 444.46 FEET						
B: DEPTH TO WATER:	_33.27FEET					
C: DEPTH OF WELL INSTALLED: 45.76	S ft.					
D: STATIC WATER LEVEL: C-D :						
E: WELL VOLUME: E * 0.1636 =	2.04 GALLONS					
F: DEPTH OF WELL AS MEASURED:	46.69 FEET					
WELL SAMPLING DATA:						
DATE: 8/13/24	CINSERL TREES.					
START TIME: 929	FINISH TIME: 951					
A: MP ELEVATION: 444.46 FEET	9.76.					
B: DEPTH TO WATER:	<u>44.36_</u> FEET					
C: DEPTH OF WELL INSTALLED: 45.76	S ft.					
D: STATIC WATER LEVEL: C-D :						
E: WELL VOLUME: E * 0.1636 =	0.23_GALLONS					
F: DEPTH OF WELL AS MEASURED:	46.70_FEET					
G: pH OF SAMPLE:	<u>6.33</u> pH € 18.2 c					
H: pH METER CALIBRATED?: YES [★]	NO[]					
I: SAMPLES OBTAINED:						
1- TOTAL METALS, 1 TOTAL CHLORIDES,	•					
J: WEATHER CONDITIONS: Clear Sun	7					
K: SAMPLER(S): Amber Fleischman, K	yle Nichter, Nicholas Kibby					
L: COMMENTS: 3.5 gals purged & d	ry Emergent Contaminents Sampled					
L: COMMENTS: 3.5 gals purged & dry / Emergent Contaminents Sampled on 8/13 then well went dry, returned 8/14 to						
finish Collection of Voas, Tchlorides, and Tmetals.						
* Bailer and String replaced						
n built und on	in builting of the					

WELL Y	VDM-11:			
	PURGING DATA: TIME: 916	DATE: 8/12/24 FINISH TIME: 919		
A:	MP ELEVATION:	450.33 FEET		
B:	DEPTH TO WATER:			
C:	DEPTH OF WELL INST	ALLED:	22.63 ft.	
D:	STATIC WATER LEVEL	:	C-D =	2.92 FEET

WELL SAMPLING DATA:

	E: 8/13/24 RT TIME: 915		FINISH TIME: 922
A:		.33 FEET	
B:	DEPTH TO WATER:		21.05 FEET
C:	DEPTH OF WELL INSTALL	ED: 22.63 ft.	
D:	STATIC WATER LEVEL:	C-D =	
E:	WELL VOLUME: E *	0.1636 =	0.26GALLONS
F:	DEPTH OF WELL AS MEASURED:		_22.85_FEET
G:	pH OF SAMPLE:		6.24 pH @ 17.9 c

H: pH METER CALIBRATED?: YES NO []
I: SAMPLES OBTAINED:

1- TOTAL METALS, 1 TOTAL CHLORIDES, 2 VOAs
J: WEATHER CONDITIONS: Clear, Sunny

K: SAMPLER(S): Amber Fleischman, Kyle Wichter, Nicholas Kibby

L: COMMENTS: ~0.5 gals purged before well went dry

*Bailer and String replaced, One to exassive

ant in well

WELL VDM-12:					
	PURGING DATA:	DATE: 8/12/24			
START TIME: 929_					
A:	MP ELEVATION: 451.01 FEET		. 2 . 0		
B:	DEPTH TO WATER:		13.18FEET		
C:	DEPTH OF WELL INSTALLED:	14.91			
D:	STATIC WATER LEVEL:	C-D =	OFEET		
E:	WELL VOLUME: E * 0.1636 =		OGALLONS		
F:	DEPTH OF WELL AS MEASURED:				
WELL S	SAMPLING DATA:				
DATE:					
START	TIME:		FINISH TIME:		
A:	MP ELEVATION: 451.01 FEET				
B:	DEPTH TO WATER:		FEET		
C:	DEPTH OF WELL INSTALLED:	14.91			
D:	STATIC WATER LEVEL:	C-D =	FEET		
E:	WELL VOLUME: E * 0.1636 =		GALLONS		
F:	DEPTH OF WELL AS MEASURED:		FEET		
G:	pH OF SAMPLE:		pH		
H:	pH METER CALIBRATED?: YES []	NO[]		
l:	SAMPLES OBTAINED:				
	1- TOTAL METALS, 1 TOTAL CHLO				
J:	WEATHER CONDITIONS: Ckar,	Sunny			
K:	SAMPLER(S): Amber Fleischi	nan			
		a	a seema factorial per colonial and the colonial		
L:	COMMENTS: No water du	tected / w	u dry		

WELL VDM-14R:

WELL	PURGING DATA:			DATE: 8/12	124_
START	TIME: 1005			FINISH TIME:_	1020
A:	MP ELEVATION:	444.74 FEET			
B:	DEPTH TO WATER:			9.84	FEET
C:	DEPTH OF WELL INST	ALLED:	11.5		
D:	STATIC WATER LEVEL	.:	C-D =	1.66	_FEET
E:	WELL VOLUME:	E * 0.1636 =		0.27	_GALLONS
F:	DEPTH OF WELL AS M	MEASURED:		11.6	FEET
WELL	SAMPLING DATA:				
DATE:	8/13/24				
START	TIME: 1015			FINISH TIME:_	1046
A:	MP ELEVATION:	444.74 FEET			
B:	DEPTH TO WATER:			9.85	_FEET
C:	DEPTH OF WELL INST	ALLED:	11.5		
D:	STATIC WATER LEVEL	<u>.:</u>	C-D =	1.65	FEET
E:	WELL VOLUME:	E * 0.1636 =		0.27	_GALLONS
F:	DEPTH OF WELL AS M	MEASURED:		11.6	FEET
G:	pH OF SAMPLE:			5.63	_pH
H:	PH METER CALIBRATE	ED?: YES	1	NO[]	
l:	SAMPLES OBTAINED:	•			
	1- TOTAL METALS, 1	TOTAL CHLOR	IDES, 2 VOAs,	1.4 dioxane	1633PFAS
J:	WEATHER CONDITION	1s: Clear S	Sunny		
			/		
K:	SAMPLER(S): Amb	er Fleischn	nan, Nicho	clas Kibby	, Kyle Nichter
	COMMENTS: 5.50	als purgeo	1. Oranges	tint > cka	r during purge
	AAC J	MSD FILL	م الا الا	and Nielic	ate Collected here
	142	MOD, FICE	a blank, c	and work	are contentarion

Alpha Analytical, Inc. Facility: Buffalo, NY Department: Sampling

Title: Field Data Sheet

ID: 18560

Revision: 3

Published Date: 10/2/2015 1:29:27 PM

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Field Data Sheet

Section 1: Event information							
Customer:	Vanchlar			Date:	8/13/2024		
Site/Location:	Site/Location: Eighten Mile Creck			Time:			
Sampler Name (printed):	Sampler Name (printed): Amber Fleischman			Weather:			
Section 2: Sample Collection Information							
Type of sample:	Grab Composite Manual Composite Other:			-			
Section 3: Field Readings							
Field pH (SM4500H+-B):	6.95			Flow 1:		Units:	
Meter ID:	AZ			Flow 2:		Units:	
Residual Chlorine (SM4500CI-G):				Flow 3:		Units:	
Meter ID:				Flow 4:		Units:	
Temperature:	22.8	文文C	□F				
Section 4: On-site Meter/Site Readings							
pH:				Integrator Value:		Units:	
Temperature:		□c	□F	Diameter of outfall pipe:			
Refrigerator Temperature:		□c	□F	Depth of outfall pipe:			
Section 5 Field Observations							
Sampler Signature: 11/1/1/1/1/1/2 PACE							