
Periodic Review Report

(July 7, 2021 through July 7, 2022)

Former Dowell Facility

3311 Walden Avenue, Depew, New York

September 2022

Prepared for:

Schlumberger

and



Prepared by:

CH2M HILL Engineers, Inc.

Dawn Greening
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September 23, 2022

Taylor Monnin
New York State Department of Environmental Conservation
Division of Environmental Remediation
700 Delaware Avenue
Buffalo, NY 14209

Re: Response to New York State Department of Environmental Conservation (NYSDEC) Comments on the Periodic Review Report (July 7, 2021 through July 7, 2022), Former Dowell Facility, Depew, New York

Dear Ms. Monnin,

Thank you for your review of the Periodic Review Report (July 7, 2021 through July 7, 2022) for the Former Dowell Depew Facility in Depew, New York. This letter is in response to your September 9, 2022 email, in which NYSDEC provided comments on the Periodic Review Report. Responses to NYSDEC's comments are provided as follows.

Comment 1 - Section 4.2 Site Inspections: *Please add when the parking lease began on the site.*

Response: The parking lease was initiated on August 23, 2017. Text in Section 4.2 was added providing this information.

Comment 2 - Section 4.2 Site Inspections: *Was the Department notified when the water from the neighboring facility was being discharged to the site?*

Response: The mechanism for notifying NYSDEC is this periodic review report (PRR). The site management plan (SMP) was referenced to verify the reporting requirements and in accordance with the SMP, it was determined that NYSDEC would only need to be notified outside of the normal PRR reporting mechanism if the emergency reduces or has the potential to reduce the effectiveness of the engineering control (EC) in place. The discharge of water was not impacting the EC and did not have the potential to reduce the effectiveness of the EC; therefore, NYSDEC was notified under the PRR. Section 4.2 was revised to clarify the notification to NYSDEC.

Comment 3 - Figures: *Please include a figure that shows where on the site was used for parking.*

Response: Despite the parking lease being in place since August 23, 2017, the neighboring facility never used the site for parking. It is our understanding that they wanted to purchase the property and would use the site for parking at that time. Section 4.2 was revised to include a statement that to date, the neighboring facility has not used the site for parking.

Comment 4 – Figures: Please include a figure that details the different cover system types onsite (soil, gravel, etc.).

Response: There are two types of cover at the site. The historical excavation and the area of the thermal treatment are covered with graded crusher run stone. The remaining portion of the site is covered in graded native soil. Figure 1-2 was revised to identify the different cover types, and references to Figure 1-2 were added to Sections 1.4 and 2.2.

If you have any questions or comments, please call me at (318) 393-6480. I can also be reached by email at DGreening@slb.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dawn Greening', with a stylized flourish underneath.

Dawn Greening
Remediation Manager

c: Andrea Caprio/New York State Department of Environmental Conservation
Sarita Wagh/New York State Department of Health
Charlotte Bethoney/New York State Department of Health
Jim Strunk/Dow Inc.
Monica Schneider/CH2M HILL Engineers, Inc.
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Prepared for

New York State Department of
Environmental Conservation

On Behalf of

Schlumberger Technology Corporation and
Dow Inc.

September 2022

Prepared by

CH2M HILL Engineers, Inc.

Executive Summary

On behalf of the Volunteers (Schlumberger Technology Corporation and Dow Inc.), CH2M HILL Engineers, Inc. (CH2M) has prepared this periodic review report (PRR) in accordance with the Site Management Plan (CH2M 2020a) for the Former Dowell Facility located in Depew, New York (site). The site entered into the New York State Department of Environmental Conservation Voluntary Cleanup Program on February 26, 2001—Voluntary Cleanup Agreement No. B9-0586-00-10, Site No. V-00410-9. The PRR was prepared as required in the Site Management Plan for the periodic submittal of data, information, recommendations, and certifications to the New York State Department of Environmental Conservation.

This PRR summarizes the site maintenance activities conducted during the reporting period from July 7, 2021, to July 7, 2022. The June 2022 site inspection form indicates that the remedy continues to perform as designed. Site institutional and engineering controls remain in place as required, and no areas of noncompliance were identified during the reporting period.

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Abbreviations and Acronyms

CH2M	CH2M HILL Engineers, Inc.
EC	engineering control
IC	institutional control
ISTT	in situ thermal treatment
NYSDEC	New York State Department of Environmental Conservation
O&M	operations and maintenance
PRR	periodic review report
site	Former Dowell Facility in Depew, New York
SMP	Site Management Plan
URS	URS Corporation
VOC	volatile organic compound
Volunteers	Schlumberger Technology Corporation and Dow Inc.

Introduction and Site Overview

This periodic review report (PRR) was prepared for the Former Dowell Facility located in Depew, New York (site). The PRR was prepared in accordance with the Site Management Plan (SMP; CH2M HILL Engineers, Inc. [CH2M] 2020a) to meet the required periodic submittal of data, information, recommendations, and certifications to the New York State Department of Environmental Conservation (NYSDEC) for this site.

1.1 Purpose

The PRR provides the following information for the reporting period to NYSDEC:

- Brief description of the site, site history, and investigation activities completed at the site.
- Description of the requirements and certifications for the site institutional controls (ICs) and engineering control (EC).
- Results of the required annual site inspections and severe conditions inspections, if applicable.
- Applicable inspection forms and other records generated for the site during the reporting period, in electronic format.

1.2 Site Location

The site is east of Buffalo, New York, at 3311 Walden Avenue in Depew, New York (Figure 1-1). The site is in a mixed residential and industrial/commercial area. Properties surrounding the site include Walden Avenue to the north, a CSX Transportation railroad yard to the south, a lumber yard and supply store (84 Lumber Company) to the east, and a mattress manufacturer (Fibrix, previously known as Buffalo Batt and Felt) to the west (Figure 1-2). A residential neighborhood and an office building housing Aero Instruments and Avionics and Family Choice of New York are adjacent to the site on the northern side of Walden Avenue.

The site is approximately 1.8 acres with a gentle downward slope to the north-northwest toward Walden Avenue. Maximum relief across the site is about 4 feet, and surface water flows from south to north across the site. The property is currently vacant, and the ground surface consists primarily of gravel and grass with small- to medium-sized trees on portions of the site. A 6-foot-high chain-linked fence with a locked entrance gate along Walden Avenue surrounds the site.

1.3 Site History

Former activities at the site included servicing industrial facilities and limited oilfield-related projects. Various industrial cleaning and oilfield-related chemicals were stored onsite and transferred into tank trucks for use at different job sites (URS Corporation [URS] 2004). A former railroad siding, which has been removed, traversed the site from east to west. Former onsite building structures included a two-story office building, chemical storage building, one-story office and maintenance shop, acid plant, bulk cement plant, cement silos, 8,000-gallon diesel aboveground storage tank, 1,000-gallon gasoline underground storage tank with dispenser, mud separator, oil/water separator, and hydrochloric acid aboveground storage tank (Figure 1-2). In the late 1980s, operations at the site were discontinued, and the facility was permanently closed. Building structures were razed during a 2003 to 2004 remedial action, and the site has been inactive since (URS 2011).

1.4 Previous Site Investigations and Remedial Action Activities

After site operations ceased, the Volunteers (Schlumberger Technology Corporation and Dow Inc.) performed site investigations to determine the nature and extent of contamination in site soil or groundwater, or both, that may be attributed to previous site activities. Table 1-1 presents a chronology of the site investigations and remedial actions.

The results of site investigations indicated elevated concentrations of volatile organic compounds (VOCs) in both soil and groundwater at the site. Additionally, asbestos-containing material was identified in several of the onsite building structures. The Volunteers subsequently entered the site into the NYSDEC Voluntary Cleanup Program, and remedial actions were initiated in October 2003. Remedial actions conducted between October 2003 and May 2004 included building or structure demolition, asbestos-containing material abatement, contaminated soil excavation and disposal, monitoring well removal and/or installation, and site restoration. A soil cover EC was installed in March 2004 as part of the site remedy (Figure 1-2), and a Declaration of Covenants and Restrictions granted to NYSDEC was recorded with the Erie County Clerk on June 22, 2005.

A long-term monitoring program consisting of quarterly groundwater sampling of onsite monitoring wells was instituted for the site following completion of the remedial actions, but before issuance of the Certificate of Completion by NYSDEC. The final remedial action report was completed and submitted to NYSDEC in September 2010 (URS 2010). The original SMP was prepared and submitted to NYSDEC in May 2011. NYSDEC issued a Certificate of Completion for the site remediation on December 7, 2011. A revised SMP was submitted to NYSDEC with updated contact information, as requested by NYSDEC, in June 2020 (CH2M 2020a) and was subsequently approved by NYSDEC in an email dated August 17, 2020. No further quarterly sampling is required per the final SMP. Site inspections and submittal of a PRR are required to be conducted annually.

Between February 2016 and October 2016, the Volunteers operated an in situ thermal treatment (ISTT) system to remediate the residual VOC contamination in onsite groundwater. The ISTT system was decommissioned in November 2016, and the site was restored to its original condition in December 2016. The Final Engineer Report was submitted to NYSDEC with revised contact information, as requested by NYSDEC, in June 2020 (CH2M 2020b) and was approved by NYSDEC in an email dated August 17, 2020.

In accordance with NYSDEC guidance (NYSDEC 2009), which is inclusive of NYSDEC Commissioner's Policy CP-43 and NYSDEC's October 2, 2018, NYSDEC's approval of the 2018 PRR conclusions and recommendations, 3 monitoring wells (MW-01, MW-02, and MW-04) and 13 piezometers (PZ-01S, PZ-01D, PZ-02S, PZ-03S, PZ-03D, PZ-04S, PZ-04D, PZ-05S, PZ-05D, PZ-07S, PZ-07D, PZ-08S, and PZ-09S) were abandoned on April 22 and 23, 2019 (CH2M 2019).

In accordance with NYSDEC guidance (NYSDEC 2009) and NYSDEC's approval of the 2019 PRR recommendations, the remaining site monitoring wells and piezometers (MW-07S, MW-07D, X-A-1, X-A-3, X-C-3, and RW-02) were abandoned on January 22, 2020. No monitoring wells or piezometers remain onsite.

Institutional Control/Engineering Control Certification Plan Compliance

This section summarizes the ICs and EC requirements for the site, which are established in the SMP, as well as the findings from the annual inspections. Appendix A contains the inspection forms.

2.1 Institutional Controls Requirements

A series of ICs is required by the Declaration of Covenants and Restrictions to: (1) implement, maintain, and monitor EC systems, (2) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination, and (3) limit the use and development of the site to restricted commercial and/or industrial uses only. Adherence to these ICs on the site is required by the Declaration of Covenants and Restrictions and is implemented under the SMP. ICs identified in the Declaration of Covenants and Restrictions may not be discontinued without an amendment to or extinguishment of the Declaration of Covenants and Restrictions. The IC boundaries encompass the entire site (Site Boundary) and are shown in Figure 1-2. They are also shown in the metes and bounds provided in Appendix A of the SMP. The ICs include the following:

- The property may be used for restricted commercial and/or industrial use.
- All ECs must be maintained as specified in the SMP.
- All ECs must be inspected at a frequency and in a manner defined in the SMP.
- The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the New York State Department of Health or the Erie Department of Health to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department.
- The owner of the property shall be responsible for implementation of the operations and maintenance (O&M) plan as stipulated in Section 7.0 – O&M plan located on page 7-1 of the *Remedial Action Report for the Former Dowell Facility 3311-3315 Walden Avenue, Depew, New York* (URS Corporation 2004), except for no further groundwater monitoring as approved by the NYSDEC in its approval of the PRR (July 7, 2018 to July 7, 2019), or implement any future modifications to the O&M plan after obtaining written approval of the Relevant Agency.
- The owner of the property shall continue in force and effect, the prohibition against uses other than restricted commercial and/or industrial uses, shall assure that any requirements stipulated in the O&M plan remain as ICs and ECs required under the Agreement, and shall continue to implement and annually report on the inspection requirements to the Relevant Agency unless the owner first obtains permission to discontinue such controls from the Relevant Agency.
- The Declaration is and shall be deemed a covenant that shall run with the land, shall be binding upon all future owners of the property, and shall provide that the owner and its successors and assigns consent to enforcement by the Relevant Agency of the prohibitions and restrictions that Paragraph X of the Agreement requires to be recorded, and hereby covenants not to contest the authority of the Relevant Agency to seek enforcement.
- Any deed of conveyance of the property, or any portion thereof, shall recite, unless the Relevant Agency has consented to the termination of such covenants and restrictions, that said conveyance is subject to the Declaration of Covenants and Restrictions.

- Information pertinent to site management must be reported at the frequency and in a manner as defined in the SMP.
- There shall be no construction, use, or occupancy of the property that results in the disturbance or excavation of the property which threatens the integrity of the soil cover or which results in unacceptable human exposure to contaminated soils. All future activities that will disturb remaining contaminated material must be conducted in accordance with the SMP and approved (written documentation) by NYSDEC.
- Maintenance, inspection, and reporting of any physical component of the remedy (e.g., the ECs) shall be performed as defined in the SMP.
- Access to the site must be provided to agents, employees, or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the Declaration of Covenants and Restrictions.
- The potential for vapor intrusion must be evaluated for any buildings developed in the area within the IC boundaries noted in the metes and bounds provided in Appendix A of the SMP, and any potential impacts that are identified must be monitored or mitigated.
- Vegetable gardens and farming on the site are prohibited.

2.2 Engineering Controls Requirements

Exposure to any remaining contamination at the site is prevented by a soil cover placed over the site as shown on Figure 1-2. This soil cover is composed of a minimum of 12 inches of native soil or crusher run stone. The location of the soil cover, which is the site boundary, is described in the metes and bounds site description in Appendix A of the SMP. The Excavation Work Plan (EWP) provided in Appendix F of the SMP outlines the procedures required to be implemented in the event the soil cover is breached, penetrated, or temporarily removed, and any underlying remaining contamination is disturbed. Procedures for the inspection of this cover are provided in the inspection plan included in Section 4 the SMP. Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a health and safety plan and associated community air monitoring plan that will be prepared for the site and provided as an attachment to the EWP.

2.3 Institutional Control and Engineering Control Certification

The site owner or remedial party will submit to NYSDEC a written statement that certifies, under penalty of perjury, the following: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by NYSDEC, and (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification will be submitted annually, or an alternate period of time that NYSDEC may allow; it will be made by a Qualified Environmental Professional as defined by New York Codes, Rules, and Regulations, Title 6, Part 375-1.2 (ak).

To date, no changes have been made to the ICs or ECs. The NYSDEC Institutional Controls and Engineering Controls Certification Form has been completed by a CH2M New York Registered Professional Engineer for this reporting period and is provided in Appendix B.

Monitoring Plan Compliance

Annual groundwater monitoring is no longer required per NYSDEC's approval of this recommendation in the 2019 PRR in a letter dated January 6, 2020. As such, no sampling was conducted during the reporting period.

Operation, Maintenance, and Inspections Compliance

4.1 Operation and Maintenance Plan Requirements

No active system is currently operating at the site; therefore, O&M were not performed.

4.2 Site Inspections

As required by the SMP, an initial sitewide inspection was performed March 24, 2022. Appendix A contains a copy of the completed sitewide inspection form. The initial sitewide inspection indicated no significant changes in the conditions of the site since delivery of the last PRR, dated August 2021 (CH2M 2021), except as described in the following paragraphs.

During the inspection, it was found that the neighboring facility (Fibrix) was discharging a liquid by corrugated pipe, through the rear gate, and onto the site. Up until 2022, Fibrix was under a lease agreement for use of the property for parking, which was initiated on August 23, 2017; however, Fibrix has not used the site for parking to date. This lease was terminated in early 2022. Per communication with Fibrix, the compressor room in the Fibrix building was having flooding issues from rain and snow melt water. On or around March 10, 2022, in response to the flooding, Fibrix created a hole through the floor slab in their compressor room and installed a sump pump to pump the water out from under the slab before it flooded the compressor room. Initially, the water was being discharged out of the back of their building to the south, toward the railroad tracks, but sometime between the installation of the pump and the initial site inspection on March 24, the pipe had been diverted through the side gate and discharged on the site. The water was discharged until March 25, 2022, when it was discovered by Fibrix to have been moved. Per the communication with Fibrix, the room was only used to house the compressor and no wastes or chemicals were stored in that room and no contamination is known to reside under the building.

NYSDEC is being notified of this discharge under this PRR, in accordance with the SMP, where it was determined that NYSDEC would only need to be notified outside of the normal PRR reporting mechanism if the emergency reduces or has the potential to reduce the effectiveness of the EC in place (CH2M 2020a). The discharge of water was not impacting the EC and did not have the potential to reduce the effectiveness of the EC as the discharge rate was relatively low.

A second site inspection was conducted on May 26, 2022. During this event, soil from around the area where the pipe was discharging was screened with a photoionization detector. No photoionization detector readings, odors, visual staining, or other signs of impacts were noted. The ICs and EC were inspected, and no impacts from this discharge were noted that did or could impact the protectiveness of the remedy. Based on the inspection results and the information that was obtained during communication with Fibrix, the rain and snow melt water beneath the slab being discharged to the site would not be impacted based on the known use of the compressor room.

The lock was replaced and secured with the chain to the gate to fully secure the site within this PRR reporting period, addressing NYSDEC's comment related to this item on the 2021 PRR. Appendix C contains the photographs from the sitewide inspections.

Remedy Performance, Effectiveness, and Protectiveness

This section summarizes the remedy performance, effectiveness, and protectiveness based on inspections and data generated during this reporting period, and comparison to historical data.

5.1 Remedy Performance

There is no active remedy operating at the site.

5.2 Remedy Effectiveness

As previously documented, the remedy was effective in removing site soil with VOC concentrations exceeding soil cleanup objectives for restricted commercial and/or industrial use (URS 2013).

The 2004 excavation and 2016 ISTT remedial actions significantly reduced VOC concentrations in groundwater. Prior to the implementation of ISTT, the concentrations of 14 VOCs exceeded their applicable standards, criteria, and guidance values in groundwater (the highest VOC concentration was 1,1-dichloroethane at 11,800 micrograms per liter at MW-6D). The last groundwater monitoring performed prior to abandonment of all remaining monitoring wells at the site was April 2019 (under the 2019 PRR reporting period), and no VOCs were detected at concentrations that exceeded their respective standards, criteria, and guidance value. As noted, groundwater monitoring is no longer required at the site.

5.3 Remedy Protectiveness

The remedy is protective of human health and the environment. The 2004 excavation removed soil with VOC concentrations more than applicable soil cleanup objectives for commercial and/or industrial sites. The 2016 ISTT system reduced VOC concentrations in groundwater to less than their respective standards, criteria, and guidance value (more than a 99 percent reduction).

Conclusions and Recommendations

The site is compliant with the requirements of the SMP (CH2M 2020a) for the July 7, 2021, through July 7, 2022 reporting period. The March and May 2022 site inspections indicate that the remedy continues to be effective in protecting human health and the environment and has not been impacted. The ICs and EC remain in place, as required.

The corrugated pipe observed during the initial inspection on March 24, 2022 that was discharging the rain and snow melt water from the Fibrix compressor room was removed. In accordance with the request from NYSDEC in the 2021 PRR approval letter, the gates are now secured with chains and combination locks.

Works Cited

CH2M HILL Engineers, Inc. (CH2M). 2019. Periodic Review Report (July 7, 2018 through July 7, 2019). Former Dowell Depew Facility 311 Walden Avenue, Depew, New York. August.

CH2M HILL Engineers, Inc. (CH2M). 2020a. *Site Management Plan. Former Dowell Depew Facility 311 Walden Avenue, Depew, New York.* June.

CH2M HILL Engineers, Inc. (CH2M). 2020b. *Final Engineer Report. Former Dowell Depew Facility 311 Walden Avenue, Depew, New York.* June.

CH2M HILL Engineers, Inc. (CH2M). 2021. Periodic Review Report (July 7, 2020 through July 7, 2021). Former Dowell Depew Facility 311 Walden Avenue, Depew, New York. August.

New York State Department of Environmental Conservation (NYSDEC). 2009. CP-43: *Groundwater Monitoring Well Decommission Policy.* November 3.

URS Corporation (URS). 2004. *Remedial Action Report for the Former Dowell Facility 3311 Walden Avenue Depew New York.* Depew, New York. July.

URS Corporation (URS). 2010. *Final Remedial Action Report for the Former Dowell Facility 3311 Walden Avenue Depew New York.* Depew, New York. September.

URS Corporation (URS). 2011. *Site Management Plan for the Former Dowell Facility 3311 Walden Avenue Depew New York.* Depew, New York. May.

URS Corporation (URS). 2013. *Periodic Review Report (December 7, 2011 – July 7, 2013) for the Former Dowell Facility 3311 Walden Avenue Depew New York.* Depew, New York. August.

Table

Table 1-1. Chronology of Site Investigations and Remedial Actions

Periodic Review Report

Former Dowell Facility, Depew, New York

Date	Work Performed
September 1989	Removal and offsite disposal was completed of the 1,000-gallon UST and its associated dispenser, the 8,000-gallon AST, and contaminated soils.
May 1990	Site investigation was performed to determine the presence or absence of chemical constituents in site soil and groundwater.
January 1992	Physical and chemical evaluation of groundwater was performed at former UST location.
September 1996 to March 1997	Monitoring well installation (MW-01, MW-02, MW-03, and MW-04) and sampling. The mud separator was decommissioned.
November 1997	Supplemental investigation was performed, soil samples were collected, and groundwater samples were collected from existing monitoring wells.
July 1998	Removal and offsite disposal was completed of former acid plant concrete revetment, 500 tons of VOC-contaminated soil from around the acid plant, cement bulk plant debris, and other miscellaneous debris.
July 1998 to January 2000	Groundwater samples for VOCs were collected four times during this period from MW-01 through MW-04.
February 26, 2001	The Volunteers entered into a Voluntary Cleanup Agreement with NYSDEC.
July 2001	Site investigation was performed to collect soil, sediment, and groundwater samples. Hydraulic conductivity testing was performed. An asbestos survey and land survey of investigation locations was completed.
October 2003 to May 2004	Remedial activities were completed, including asbestos abatement, building/structure demolition, monitoring well abandonment and installation, and excavation and offsite disposal of approximately 4,610 tons of VOC-contaminated soil.
October 2005	Installation of monitoring well MW-07D was completed.
April 2008	Offsite groundwater investigation was completed at three temporary piezometers (BH-01, BH-02, and BH-03) on the northern side of Walden Avenue.
June 2009	Six injection wells upgradient of monitoring wells MW-06S and MW-06D were installed and implemented; 377 gallons of hydrogen peroxide and sodium persulfate were injected between August and November 2009.
September 2010	The final remedial action report was prepared and submitted to NYSDEC.
May 2011	A Site Management Plan was submitted to NYSDEC and subsequently approved.
December 2011	NYSDEC issued a Certificate of Completion for the site remediation.
August 2013	The first Periodic Review Report was submitted and presented a summary of the remedy performance during the period from December 7, 2011, through July 7, 2013.
August 2014	The second Periodic Review Report was submitted and presented a summary of the remedy performance during the period from July 7, 2013, through July 7, 2014.
August 2015	The third Periodic Review Report was submitted and presented a summary of the remedy performance during the period from July 7, 2014, through July 7, 2015.
August 2015	A remedial action work plan was prepared and submitted to NYSDEC for the final onsite remedy to remediate onsite VOC-impacted groundwater.
October 2015	Installation of an ISTT system was completed to remediate onsite VOC-impacted groundwater.
February 2016	Start-up of ISTT system was completed to remediate onsite VOC-impacted groundwater.
August 2016	The fourth Periodic Review Report was submitted and presented a summary of the remedy performance during the period from July 7, 2015, through July 7, 2016.
October 2016	Operation of the ISTT system was ceased to remediate onsite VOC-impacted groundwater.
November 2016 to December 2016	Decommissioning of the ISTT system and site restoration were completed. Recovery wells X-A-1, X-A-3, and X-C-3 were retrofitted into long-term site monitoring wells to replace previously abandoned site monitoring wells MW-06S, MW-06D, and RW-01.
March 2017	A final engineer report documenting the construction, operation, and decommissioning of the ISTT system was prepared and submitted to NYSDEC.
August 2017	The fifth Periodic Review Report was submitted and presented a summary of the remedy performance during the period from July 7, 2016, through July 7, 2017.
October 2017	A post-ISTT confirmation sampling event was completed.
June 2018	A post-ISTT confirmation sampling event was completed.
August 2018	The sixth Periodic Review Report was submitted and presented a summary of the remedy performance during the period from July 7, 2017, through July 7, 2018.
October 2018	A post-ISTT confirmation sampling event was completed.
April 2019	Abandoned site monitoring wells MW-01, MW-02, MW-04 and all 13 site piezometers.
August 2019	The seventh Periodic Review Report was submitted and presented a summary of the remedy performance during the period from July 7, 2018, through July 7, 2019.
January 2020	Abandoned site monitoring wells X-A-1, X-A-3, X-C-3, MW-07S, MW-07D, and RW-02.
February 2020	A revised final engineer report documenting the construction, operation, and decommissioning of the ISTT system was submitted to NYSDEC.
June 2020	Final Engineer Report and Final Site Management Plan with revised contact information were submitted to NYSDEC.
August 2020	Final Engineer Report and Final Site Management Plan were approved by NYSDEC.
August 2021	The eighth Periodic Review Report was submitted and presented a summary of the remedy performance during the period from July 7, 2019, through July 7, 2020.
August 2021	The ninth Periodic Review Report was submitted and presented a summary of the remedy performance during the period of July 7, 2020, through July 7, 2021.

Notes:

AST = aboveground storage tank

ISTT = in situ thermal treatment

MCL = maximum contaminant level

NYSDEC = New York State Department of Environmental Conservation

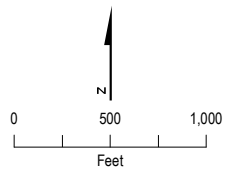
UST = underground storage tank

VOC = volatile organic compound

Figures



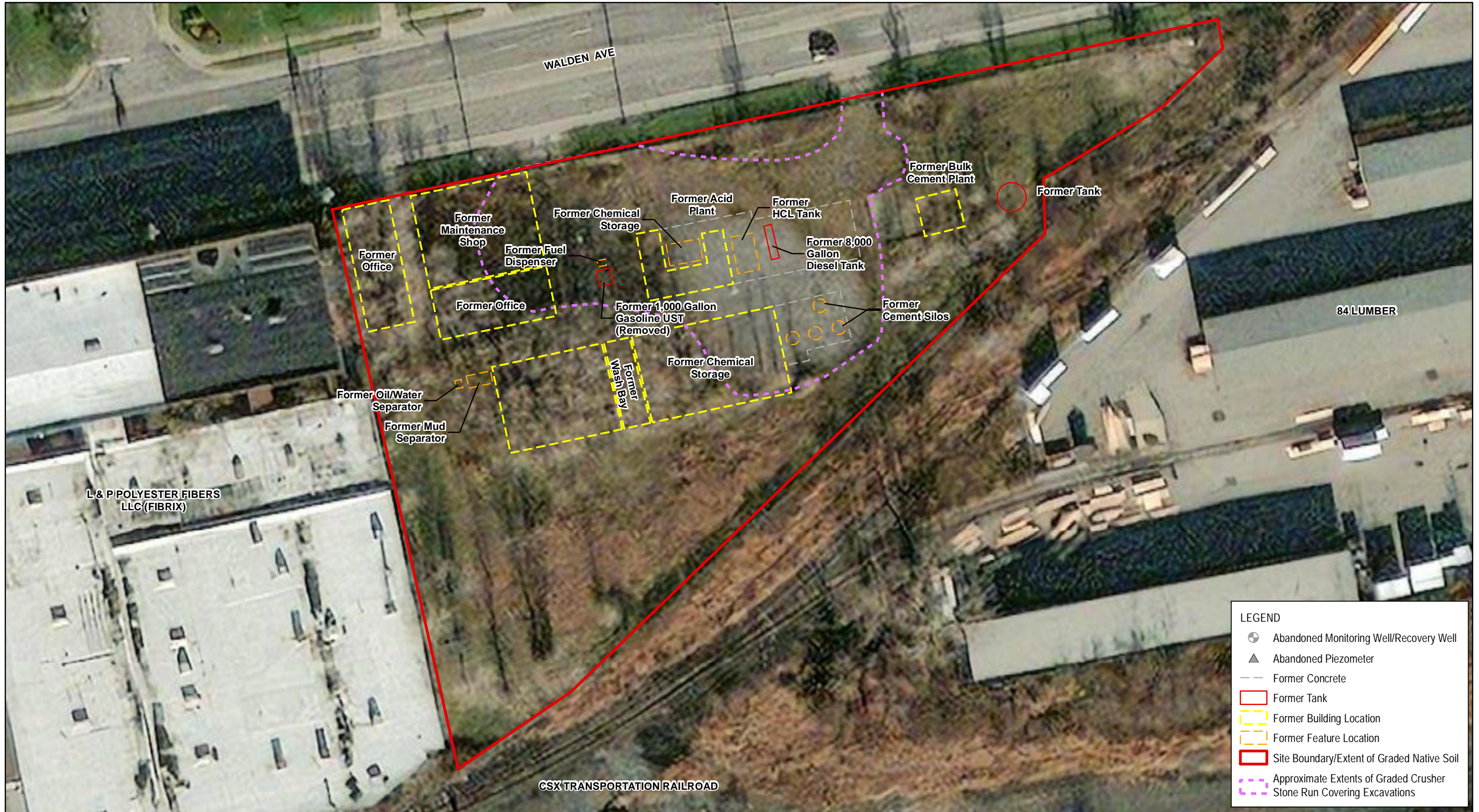
Source:
Imagery: ESRI ArcGIS Online World Imagery - 2021



LEGEND
 Site Boundary

Figure 1-1.
Site Location Map
 Periodic Review Report
 Former Dowell Facility, Depew, New York

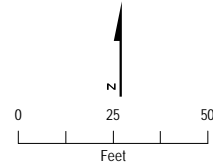
CH2M HILL Engineers, Inc.



Notes:
 1. Location of former buildings, tanks, concrete, and other former site features is approximate.

Acronyms:
 HCL = hydrochloric acid
 UST = underground storage tank

Source:
 Imagery: Esri World Imagery Basemap - 2021



LEGEND

- ⊕ Abandoned Monitoring Well/Recovery Well
- ▲ Abandoned Piezometer
- Former Concrete
- Former Tank
- ▭ Former Building Location
- ▭ Former Feature Location
- ▭ Site Boundary/Extent of Graded Native Soil
- ⋯ Approximate Extents of Graded Crusher Stone Run Covering Excavations

FIGURE 1-2.
 Site Map
 Periodic Review Report
 Former Dowell Facility, Depew, New York

Appendix A
Sitewide and Engineering Control
Inspection Forms

**FORMER DOWELL FACILITY – DEPEW, NEW YORK
SITE MANAGEMENT PLAN**

NYSDEC SITE NO. V-00410-9

SITE-WIDE INSPECTION FORM

Date: 3/24/22 **Inspector:** Dan Holmes
Weather: Cool, overcast **Signature:** [Signature]
Temperature: 48°F **Company:** Jacobs

Inspection Year: 2022

Item Inspected	Maintenance Needed (Y/N)	Comments
General Site Access	N	Entrance and gate accessible/clear
Soil /Grass Cover	N	Soil/grass cover appears in good condition, gravel covering middle portion of site appears in good condition
Security Fencing, Gates and Locks	N	Gate is old/slightly rusted but works. Chain and lock present/wrapped around entrance gate but not actually secured/is dummy locked
Site Drainage	N	A couple small spots of standing water due to recent rainfall observed, but no issues
Trees, Bushes, Other Vegetation	N	Vegetation and grass manageable/not overgrown
Miscellaneous		Observed a small corrugated drain pipe running from the Fibrix building through the main gate in the southwest corner of the site on to the site property and periodically discharging water on to the ground

**FORMER DOWELL FACILITY – DEPEW, NEW YORK
SITE MANAGEMENT PLAN**

NYSDEC SITE NO. V-00410-9

SITE-WIDE INSPECTION FORM

Date: 5/26/22 **Inspector:** Dan Holmes
Weather: Sunny, clear **Signature:** [Signature]
Temperature: 70°F **Company:** Jacobs

Inspection Year: 2022

Item Inspected	Maintenance Needed (Y/N)	Comments
General Site Access	N	Entrance and gate accessible/clear
Soil /Grass Cover	N	Soil/grass cover and gravel covering middle portion of site appear in good condition
Security Fencing, Gates and Locks	N	New combination locks put on entrance gate and man gate in southwest corner of site
Site Drainage	N	No standing water observed
Trees, Bushes, Other Vegetation	N	Vegetation and grass appear manageable
Miscellaneous		Black corrugated drain pipe observed to be discharging water from Fibrix building onto site property during March site visit has been removed. No
		visible impacts to area where pipe was located, and no PID readings observed from soil where water was discharging.

**APPENDIX G
FORMER DOWELL FACILITY - DEPEW, NEW YORK
SITE MANAGEMENT PLAN**

NYSDEC SITE NO. V-00410-9

ENGINEERING CONTROL SYSTEMS INSPECTION FORM

Component	Item	Observations
Soil Cover	Evaluate the condition and continued effectiveness of the soil cover and whether the soil cover continues to perform as designed by inspecting for the following: Obvious subsidence, depressions or cracks. Evidence of ponded water Stressed or missing vegetation Soil erosion due to surface runoff Animal burrows Any other visible issues	Soil cover appears to be in good condition. No visible signs of any cracks, depressions, or animal burrows. A couple small areas of ponded water due to recent rainfall. No obvious subsidence or soil erosion due to surface runoff observed. Vegetation/grass is manageable, not as overgrown or tall as last site visit.

Date:

3/24/22

Inspector:

Dan Holmes

**APPENDIX G
FORMER DOWELL FACILITY - DEPEW, NEW YORK
SITE MANAGEMENT PLAN**

NYSDEC SITE NO. V-00410-9

ENGINEERING CONTROL SYSTEMS INSPECTION FORM

Component	Item	Observations
Soil Cover	Evaluate the condition and continued effectiveness of the soil cover and whether the soil cover continues to perform as designed by inspecting for the following: Obvious subsidence, depressions or cracks. Evidence of ponded water Stressed or missing vegetation Soil erosion due to surface runoff Animal burrows Any other visible issues	Soil cover and areas of gravel appear in good condition. No visible signs of cracks, depressions, or animal burrows. No areas of ponded water observed. No obvious subsidence or soil erosion due to surface runoff observed. Vegetation/grass is manageable, not too overgrown.

Date:

5/26/22

Inspector:

Dan Holmes

Appendix B
Institutional and Engineering Controls
Certification Form



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



	Site Details	Box 1	
Site No.	V00410		
Site Name Former Dowell Facility			
Site Address: 3311-3313 Walden Ave		Zip Code: 14043	
City/Town: Depew			
County: Erie			
Site Acreage: 1.780			
Reporting Period: July 07, 2021 to July 07, 2022			
		YES	NO
1.	Is the information above correct?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	If NO, include handwritten above or on a separate sheet.		
2.	Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.	Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.	Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.		
5.	Is the site currently undergoing development?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Box 2	
		YES	NO
6.	Is the current site use consistent with the use(s) listed below? Commercial and Industrial	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7.	Are all ICs in place and functioning as designed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.			
A Corrective Measures Work Plan must be submitted along with this form to address these issues.			
Signature of Owner, Remedial Party or Designated Representative		Date	

Description of Institutional Controls

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
104.09-1-14	Schlumberger Technology Corporation	

Ground Water Use Restriction
 Landuse Restriction
 Monitoring Plan
 Site Management Plan

In accordance with the June 2020 Site Management Plan, prohibition of groundwater use, restriction of use to industrial/commercial, annual reporting, no constructions without approval of Relevant Agency, soil vapor study or installation of vapor mitigation system according to DOH guidelines required before re-use.

104.09-1-15	Schlumberger Technology Corporation
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Ground Water Use Restriction
 Landuse Restriction
 Monitoring Plan
 Site Management Plan

In accordance with the June 2020 Site Management Plan, prohibition of groundwater use, restriction of use to industrial/commercial, annual reporting, no constructions without approval of Relevant Agency, soil vapor study or installation of vapor mitigation system according to DOH guidelines required before re-use.

Description of Engineering Controls

<u>Parcel</u>	<u>Engineering Control</u>
104.09-1-14	

Cover System

104.09-1-15

Cover System

Periodic Review Report (PRR) Certification Statements

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

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the Engineering Control certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

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

(a) The Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

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

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

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. V00410

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

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

I, Key ROSEBROOK at 2411 Dulles Corner Park, Ste 500
Herndon VA 20171
print name print business address

am certifying as Designated Representative (Owner or Remedial Party)

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

Key Rosebrook
Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification 8/2022



EC CERTIFICATIONS

Box 7

Qualified Environmental Professional Signature

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

I KEY ROSEBROOK at 2411 Dulles Corner Parkg Suite 500
Herrndon, VA 20171
print name print business address

am certifying as a Qualified Environmental Professional for the Designated Representative
(Owner or Remedial Party)

[Handwritten Signature]
Signature of Qualified Environmental Professional,
the Owner or Remedial Party, Rendering Certification



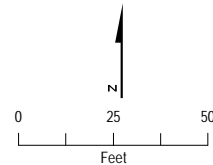
July 8, 2022
Date

Appendix C

Photographs



Source:
Imagery: Esri World Imagery Basemap - 2021



Appendix C.
Photograph Location Map
Periodic Review Report
Former Dowell Facility, Depew, New York

CH2M HILL Engineers, Inc.

Initial Site Inspection - March 2022

Photographs

Photograph Number: 1
Subject/Description: Site entrance area facing South



Photograph Number: 2
Subject/Description: Eastern end area facing West



Photographs

Photograph Number: 3
Subject/Description: Eastern end area facing East-northeast



Photograph Number: 4
Subject/Description: Central area facing West



Photographs

Photograph Number: 5
Subject/Description: Along southern site boundary facing Southwest



Photograph Number: 6
Subject/Description: Southern corner area facing Southwest



Photographs

Photograph Number: 7
Subject/Description: Southern corner facing North



Photograph Number: 8
Subject/Description: Southern corner facing Southwest, corrugated pipe present



Photographs

Photograph Number: 9
Subject/Description: Eastern end area facing Southeast



Photograph Number: 10
Subject/Description: Central area facing West



Photographs

Photograph Number: 11
Subject/Description: Along northern site boundary facing East-southeast



Second Site Inspection - May 2022

Photographs

Photograph Number: 12
Subject/Description: Southern corner facing Southwest, corrugated pipe no longer present during second site inspection



Photograph Number: 13
Subject/Description: Southern corner facing West, new combination lock on gate



Photographs

Photograph Number: 14

Subject/Description: Site entrance gate facing North-northeast



Photograph Number: 15

Subject/Description: Site entrance gate facing East-southeast, new combination lock on gate

