Periodic Review Report

(July 7, 2023 through July 7, 2024)

Former Dowell Facility

3311 Walden Avenue, Depew, New York

(NYSDEC Site Number V00410)

July 2024

Prepared for:

Schlumberger and DOW

Prepared by:

CH2M HILL Engineers, Inc.

Schlumberger

Dawn Greening
Remediation Manager
Schlumberger Technology Corporation
121 Industrial Blvd.
Sugar Land, TX 77478
Tel: (318) 393-6480

July 25, 2024

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

Re: Periodic Review Report (Site Number V00410) (July 7, 2023, through July 7, 2024), Former Dowell Facility, Depew, New York

Dear Ms. Monnin,

Please find enclosed one electronic copy (submitted via email) of the above referenced document.

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,

Dawn Greening
Remediation Manager

c: Andrea Caprio/New York State Department of Environmental Conservation
Sarita Wagh/New York State Department of Health
Wendy Kuehner/New York State Department of Health
Meredith Harris/Dow Inc.
Glynn Roberts/CH2M HILL Engineers, Inc.
Monica Schneider/CH2M HILL Engineers, Inc.
Anne Nea/CH2M HILL Engineers, Inc.

Periodic Review Report
(July 7, 2023, through July 7, 2024)

Former Dowell Facility
3311 Walden Avenue, Depew, New York
(NYSDEC Site Number V00410)

Prepared for

New York State Department of Environmental Conservation

On Behalf of

Schlumberger Technology Corporation and Dow Inc.

July 2024

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. V00410-9. 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, 2023, to July 7, 2024. The March 2024 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.

Contents

Abbreviations and Acronyms

AST	aboveground storage tank
CH2M	CH2M HILL Engineers, Inc.
EC	engineering control
EWP	Excavation Work Plan
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.

SECTION 1

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:

- 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 locations (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 (AST), 1,000-gallon gasoline underground storage tank with dispenser, mud separator, oil/water separator, and hydrochloric acid AST (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 or installation, or both; and site restoration through a soil cover EC consisting of a minimum of 12 inches of native soil or crusher run stone that extends to the site boundary (CH2M 2020a). The soil cover EC was installed in March 2004 as part of the site remedy (URS 2004), and a Declaration of Covenants and Restrictions granted to NYSDEC was recorded with the Erie County Clerk on June 22, 2005.

On June 12, 2024, NYSDEC commented that the soil in the area of monitoring well MW-01 and the eastern portion in the area of monitoring well MW-02 were not thoroughly investigated and that further assessment should be completed to confirm remaining soil is below the NYSDEC's soil cleanup objectives to meet the site cover requirements. While outside of this reporting period, a July 12, 2024, letter that responds to NYSDEC's comment is provided in Appendix A. To date, the Volunteers have not received a response to their July 12, 2024, letter.

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 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 approval of the 2018 PRR conclusions and recommendations (CH2M 2018), three 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 (CH2M 2019), 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.

SECTION 2

Institutional Control and 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 B contains the inspection forms.

2.1 Institutional Controls Requirements

A series of ICs is required by the Declaration of Covenants and Restrictions as follows: (1) to implement, maintain, and monitor EC systems, (2) to prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination, and (3) to 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 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 EC soil cover is composed of washed gravel in the bottom 14 to 15 feet bgs with a geotextile layer installed on top. In the northern half of the excavation, crushed concrete was placed to approximately 1 foot bgs. In the southern portion of the excavation, clean soil and gravel that had been previously excavated was placed on top of the bank run gravel to approximately 2 feet bgs. Crusher run stone was then placed across the entire excavation to grade, and the rest of the site was graded to ensure proper drainage using crusher run stone and native soil. The location of the soil cover, which extends across the site to 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 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 C.

SECTION 3

Monitoring Plan Compliance

Annual groundwater monitoring is no longer required per NYSDEC's approval of this recommendation in the 2019 PRR (CH2M 2019) in the approval letter dated January 6, 2020. As such, no sampling was conducted during the reporting period.

SECTION 4

Operation, Maintenance, and Inspections Compliance

4.1 Operation and Maintenance Plan Requirements

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

4.2 Sitewide and Engineering Control Inspections

As required by the SMP, a sitewide and EC inspection was performed March 20, 2024. Appendix B contains copies of the completed sitewide inspection forms.

The following is a summary of key site observations:

- The extent of the soil cover consisting of graded native soil and the extent of the soil cover consisting of graded crusher run stone were in good condition.
- There were no visible signs of cracks, depressions, or animal burrows.
- Vegetation around the site was not stressed.
- The main entrance gate was secured and locked upon arrival. However, the man gate in the southwestern corner of the site was open upon arrival. It appeared that the chain-link fencing was cut to allow the gate to be opened. The chain-link fencing was repositioned, and the gate locked with a combination lock.

In summary, no significant changes in site conditions were observed since delivery of the last PRR, dated January 2024 (CH2M 2024).

Photographs from the sitewide inspection are provided in Appendix D.

SECTION 5

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 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 greater 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).

SECTION 6

Conclusions and Recommendations

The site is compliant with the requirements of the SMP (CH2M 2020a) for the July 7, 2023, through July 7, 2024, reporting period. The March 2024 site inspection indicates 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.

No areas of noncompliance were identified during the reporting period.

In accordance with the NYSDEC email dated April 9, 2024, site inspections will be conducted later in the spring during a drier period and to the best of our ability, the inspection dates will not be scheduled during or immediately after a precipitation event. Also, the NYSDEC will be notified at least 7 days prior to site inspections.

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 and 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 ceased.
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	A post-ISTT confirmation sampling event was completed. Site monitoring wells MW-01, MW-02, MW-04, and all 13 site piezometers were abandoned.
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	Site monitoring wells X-A-1, X-A-3, X-C-3, MW-07S, MW-07D, and RW-02 were abandoned.
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.
	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 from July 7, 2020, through July 7, 2021.
August 2022	The tenth Periodic Review Report was submitted and presented a summary of the remedy performance during the period from July 7, 2021, through July 7, 2022.
July 2023	The eleventh Periodic Review Report was submitted and presented a summary of the remedy performance during the period from July 7, 2022, through July 7, 2023.
January 2024	The revised eleventh Periodic Review Report was submitted and presented a summary of the remedy performance during the period from July 7, 2022, through July 7, 2023.

Notes:

AST = aboveground storage tank

ISTT = in situ thermal treatment

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

N

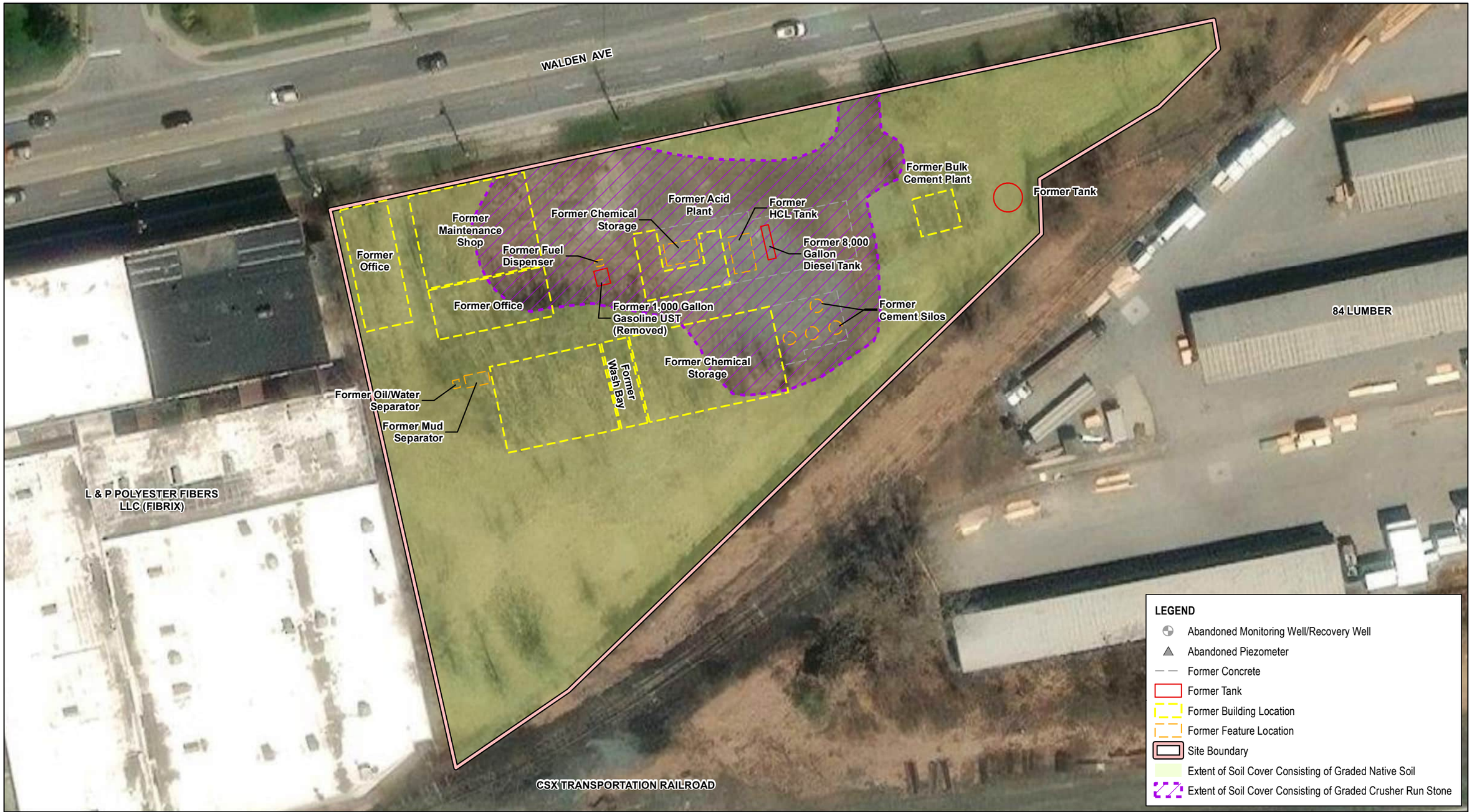
0 500 1,000

Feet

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

CH2M HILL Engineers, Inc.

\\DC1VS01\GISPROJ\D\DOWELL\DOWELL_DEPEW_480860\MAPFILES\2022\FIG1-1_LOCATION_MAP.MXD JHANSEN1 7/11/2022 3:15:36 PM



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 - 2023

N

0 25 50
Feet

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

CH2M HILL Engineers, Inc.

RDD \\DC1VS01\GISPROJ\D\DOWELL\DOWELL_DEPEW_480860\MAPFILES\FIG 1-2 - SITE MAP_REVSEPT2022.MXD GTWIGG 1/11/2024 9:36:49 AM

Appendix A
Response to Additional Site Characterization Request

Dawn Greening
Remediation Manager
Schlumberger Technology Corporation
121 Industrial Blvd.
Sugar Land, TX 77478
Tel: (318) 393-6480

July 12, 2024

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

Re: Former Dowell Facility, 3311 Walden Avenue, Depew, New York (Site Number V00410) – Response to Additional Site Characterization Request

Dear Ms. Monnin,

On behalf of Schlumberger Technology Corporation and Dow Inc., please find below our responses to your question in the email dated June 12, 2024, requesting a Work Plan to assess soil in the locations of monitoring wells MW-01 and MW-02 at the Former Dowell Facility in Depew, New York.

Question: *According to the RAWP and RAR, it appears the southern portion of the site in the area of MW-01 and the eastern portion in the area of MW-02 were not thoroughly investigated during initial remedial efforts. Therefore, to confirm the remaining soil is below the NYSDEC's soil cleanup objectives to meet the site cover requirements, further assessment should be completed. Would you be able to submit a Work Plan to the NYSDEC to assess the soil locations noted?*

Response: We do not believe that additional site characterization is warranted based on the following:

- No historical operations were conducted in the areas identified by the New York State Department of Environmental Conservation (NYSDEC) as needing additional characterization based on historical documentation of activities at the site and a historical aerial photography review.[1] Historical aerial photographs from 1958, 1963, 1966, 1974, 1983, 1985, 1995, 2002, 2005, 2006, 2008, 2009, 2011, 2013, 2015, 2017, 2019, and 2021 were reviewed, and no historical operations were conducted in these two areas. Historical aerial photographs are available for viewing at the website included in footnote 1.
- The soil cuttings from the installation of monitoring wells MW-01 and MW-02 had no observable staining or odors. Monitoring wells MW-01 and MW-02 were installed to 30.0 and 28.3 feet below ground surface, respectively.[2] The soil boring logs for MW-01 and MW-02 are provided in Attachment 1.
- As part of the 2003/2004 excavation to remove the previously identified contaminated soil from east of the Former Maintenance Shop, at the northwest corner of the previously

[1] Accessed online at www.historicaerials.com, June 21, 2024.

[2] Radian. 1997. *Groundwater Assessment, Depew, New York Facility*. August.

demolished Former Acid Plant, from the northeast corner of the Former Chemical Storage Building, and around MW-03, the contaminant of concern (COC) concentrations in confirmation samples from the excavation sidewalls that were closest to MW-01 and MW-02 were less than their respective cleanup objectives of total VOCs being less than 10 parts per million.[3] A figure displaying the confirmation sample locations and results is provided in Attachment 2.

- Groundwater samples were collected from monitoring wells MW-01 and MW-02 in 1996 through 1998, 2000, 2001, 2004 through 2009, and 2011 through 2013. Throughout the sampling events, no COC concentrations exceeded their respective maximum contaminant levels at monitoring wells MW-01 or MW-02.[3] As a result of the historical sampling results, monitoring wells MW-01 and MW-02 were removed from the sampling program in 2014[4] and were plugged and abandoned in January 2020 in accordance with NYSDEC guidance, which is inclusive of NYSDEC Commissioner's Policy CP-43, and NYSDEC's approval of the 2018 PRR conclusions and recommendations in 2019.[5]

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,

Dawn Greening
Remediation Manager

c: Andrea Caprio/New York State Department of Environmental Conservation
Sarita Wagh/New York State Department of Health
Wendy Kuehner/New York State Department of Health
Meredith Harris/Dow Inc.
Glynn Roberts/CH2M HILL Engineers, Inc.
Monica Schneider/CH2M HILL Engineers, Inc.
Anne Nea/CH2M HILL Engineers, Inc.

[3] URS. 2013. *Periodic Review Report (July 7, 2011 through July 7, 2013), Former Dowell Facility, 3311 Walden Avenue, Depew, New York*. August.

[4] CH2M. 2014. *Periodic Review Report (July 7, 2013 through July 7, 2014), Former Dowell Facility, 3311 Walden Ave, Depew, New York.* August.

[5] CH2M. 2018. *Periodic Review Report (July 7, 2017 through July 7, 2018), Former Dowell Facility, 3311 Walden Ave, Depew, New York.* August.

Attachment 1
Monitoring Well Boring Logs

RADIAN INTERNATIONAL LLC

WELL NO. MW-1 PAGE 1 OF 1

PROJECT NAME DS - Dapew PROJECT NO. 007531

LOCATION GEOLOGIST DNM

BY DNM DRILLING CONTRACTOR MAXIM DRILLER

DATE 10/23/96 DRILLING METHOD HSA w/ SS Samples RIG TYPE CME-75

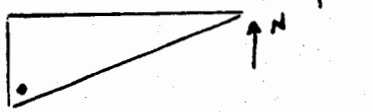
CHK BY DRILLING START DATE 9/10/96 DRILLING COMPLETION DATE 9/10/96

DATE SURFACE ELEVATION STICK-UP ELEVATION

DEPTH FEET	SOIL SAMPLE NO.	REC. (IN.)	BL/6"	ROCK SAMPLE RUN (FT)	REC. (%)	RQD. (%)	VISUAL CLASSIFICATION AND REMARKS	PROFILE	STATIC WATER LEVEL (FT) / BORING/CASING DIA. (IN.)	DEPTH (FEET)	WELL CONSTRUCTION DETAILS	REMARKS
0												
2	SS1	4	9, 6, 10, 18				Medium Dense, Black-Brown Silty CINDERS and Fine to Coarse Angular GRAVEL, Moist	F			Flushmount Protective Cover	
4	SS2	6	24, 12, 3, 3				Medium Dense to Very Loose, Fine to Medium CINDERS, Trace to Little Wood Frags, Crushed Sandstone, and Fine to Medium Gravel, Moist				Bentonite-Cement Grout	
6	SS3	12	3, 3, 5, 7				Soft to Medium Stiff, Green-Gray Silty Clay Grading to Red-Brown CLAY, Trace Silt, Plant Roots, Moist	CL			2" PVC Sch 40 Riser	
8	SS4	20	14, 16, 20, 28				Very Stiff, Red-Brown CLAY, Little Silt, Gray Along Fractures, Damp					
10	SS5	0"	21, 21, 29, 28				No RECOVERY	CL				
12	SS6	13	7, 8, 12, 13				Stiff, Red-Brown and Gray CLAY, Orange-Brown Staining, Little Silt, Trace Fine to Medium Gravel, Moist	CL	9/12 ▼			

ADDITIONAL REMARKS

Well located in S.E. corner of property



LE:\FORMATS\FOR

RADIAN INTERNATIONAL LLC

WELL NO. MW-1 PAGE 2 OF 3

PROJECT NAME DS - Depew PROJECT NO. 097531

LOCATION Depew, NY GEOLOGIST DNM

DEPTH FEET	SOIL SAMPLE NO.	REC. (IN.)	BL./6"	ROCK SAMPLE RUN (FT)	REC. (%)	RQD. (%)	VISUAL CLASSIFICATION AND REMARKS	PROFILE	STATIC WATER LEVEL (FT)	BORING/CASING DIA. (IN.)	DEPTH (FEET)	WELL CONSTRUCTION DETAILS	REMARKS
12	SS7	0	18 18 20 16				No Recovery	CL			14	Bentonite Seal	
14	SS8	24	5 11 11 12				Stiff, Red-Brown CLAY, Little Silt, Trace very Fine Sand and Fine to Medium Gravel, Iron-Stained, Moist	CL			17	Clean Filter Sand Pack	
16	SS9	22	18 20 21 18				Very Stiff, Gray-Brown CLAY, Little Silt, Trace to Little Fine to Medium Gravel, Trace Very Fine to Medium Sand and very Coarse Gravel Moist	CL			20	2" Sch 40 PVC Well Screen (0.010" Slot)	
18	SS10	1	5 9 12 15				Stiff, Gray-Brown, CLAY, Little Silt, Trace Very Fine to Medium Sand and Fine to Medium Gravel, Moist	CL					
20	SS11	22	3 6 31 6				Soft, Red-Gray CLAY, Little Silt and Very Fine Sand, Little Fine to Medium Gravel, Moist	CL					
22	SS12	24	10 10 14 18				Stiff, Gray-Brown CLAY, Little Silt and Very Fine to Fine Sand, Little Fine to Medium Gravel, 2" Sandy Gravel Seam @ 23.5', Wet	CL					
24	SS13	20	16 8 11 16				Stiff, Gray-Brown CLAY, Some Silt, Little Fine to Medium Sand and Fine to Medium Gravel, Spoon-Wet	SP CL					
26	SS14	13	10 10 30 42				Stiff to Hard, As Above to 27.0', Red-Brown, CLAY Little Silt and Fine to Medium Gravel, Moist						
28													

ADDITIONAL REMARKS

LE:\FORMATS\FORM

RADIAN INTERNATIONAL LLC

WELL NO. MW-1 PAGE OF

PROJECT NAME DS- Depew PROJECT NO. 607531

LOCATION Depew, NY GEOLOGIST DNM

DEPTH FEET	SOIL SAMPLE NO.	REC. (IN.)	BL./6"	ROCK SAMPLE RUN (FT)	REC. (%)	ROD. (%)	VISUAL CLASSIFICATION AND REMARKS	PROFILE	STATIC WATER LEVEL (FT)	BORING/CASING DIA. (IN.)	DEPTH (FEET)	WELL CONSTRUCTION DETAILS	REMARKS
28			41				Hard, Red-Brown CLAY, Little to Some Silt, Little Very Fine to Fine Sand and Fine to Medium Gravel, Moist	CL					
	SS15	18	14										
			21										
30			100/0								30		PVC End Cap
							HSA Refusal @ 30.0'						

ADDITIONAL REMARKS

RADIAN INTERNATIONAL LLC

WELL NO. [illegible] PAGE 1 OF 1

PROJECT NAME DS - Drizzle PROJECT NO. [illegible]

LOCATION _____ GEOLOGIST DNM

BY DNM DRILLING CONTRACTOR Maxim Tech. DRILLER _____

DATE 10/23/96 DRILLING METHOD HSA w/ SS Sampling RIG TYPE CME-75

CHK BY _____ DRILLING START DATE 9/11/96 DRILLING COMPLETION DATE 9/11/96

DATE _____ SURFACE ELEVATION _____ STICK-UP ELEVATION _____

DEPTH FEET	SOIL SAMPLE NO.	SOIL SAMPLE REC. (IN.)	SOIL SAMPLE BL/6"	ROCK SAMPLE RUN (FT)	ROCK SAMPLE REC. (%)	ROCK SAMPLE RQD. (%)	VISUAL CLASSIFICATION AND REMARKS	PROFILE	STATIC WATER LEVEL (FT)	BORING/CASING DIA. (IN.)	DEPTH (FEET)	WELL CONSTRUCTION DETAILS	REMARKS
0													
0	SS1	15	33 60 80 22				Very Dense, Black-Brown Medium to Coarse CINDERS, Some Fine to Coarse Sand, Little Coarse Sand, Moist						
2	SS2	8	3 3 5 7				Medium Stiff, Red-Brown, CLAY, Little Silt, Trace Fine Sand and Fine Gravel, Plant Roots, Wet on Top						
4	SS3	4	33 16 18 19				Very Stiff, Red-Brown, CLAY, Little Silt, Trace Fine Gravel, Gray Along Some Fractures, Damp		9/12				
6	SS4	14	28 28 32 36				Hard, Red-Brown CLAY, Trace to Little Silt, Damp						
8	SS5	20	16 19 27 47				Very Stiff to Hard, Red-Brown CLAY, Trace Silt, Very Fine Gravel, Fine Sand, Trace Gray Mottles and Iron Staining, Damp						
10	SS6	8	30 28 20 21				Very Stiff, Red-brown CLAY, Little Silt, Trace Fine Gravel, Damp						
12													

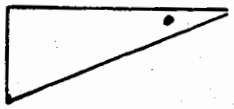
Flushmount Protective Cover

Bentonite-Cement Grout

2" Sch 40 PVC Riser

Well located in N.E Corner of Property

ADDITIONAL REMARKS



RADIAN INTERNATIONAL LLC

WELL NO. MW-2 PAGE 1 OF 2

PROJECT NAME DS - DEPEW PROJECT NO. 207531

LOCATION DEPEW, NY GEOLOGIST DNM

DEPTH FEET	SOIL SAMPLE NO.	REC. (IN.)	BL./6"	ROCK SAMPLE RUN (FT)	REC. (%)	ROD. (%)	VISUAL CLASSIFICATION AND REMARKS
12	SS7	24	38 57 31 30				Hard, Red-Brown CLAY, Trace to Little Silt, Trace Fine Sand and Fine Gravel, Little Iron-Staining, Damp to Moist
14	SS8	0	7 11 11 10				No Recovery
16	SS9	23	8 10 13 13				Stiff, Red-Brown, Gray-Brown CLAY, Little Silt and Very Fine to Medium Sand, Little Fine Gravel, Moist to Wet
18	SS10	24	6 6 10 13				Medium Stiff to Stiff, Red-Brown CLAY, Little Silt and Very Fine to Fine Sand, Little Fine Gravel, Moist to Wet
20	SS11	24	6 6 10 14				As Above w/ Coarser Gravel
22	SS12	22	6 6 10 13				Medium Stiff to Stiff, Red-Brown CLAY, Little Fine to Medium Gravel and Silt, Little Very Fine to Medium Sand, Wet @ 23.0'
24	SS13	0	5 8 9 15				No Recovery
26	SS14	0	11 13 50/2"				No Recovery HSA to Refusal @ 28.3'
28							

PROFILE | STATIC WATER LEVEL (FT) | BORING/CASING DIA. (IN.)

DEPTH (FEET): 13.5, 15, 18.3, 28.3

WELL CONSTRUCTION DETAILS

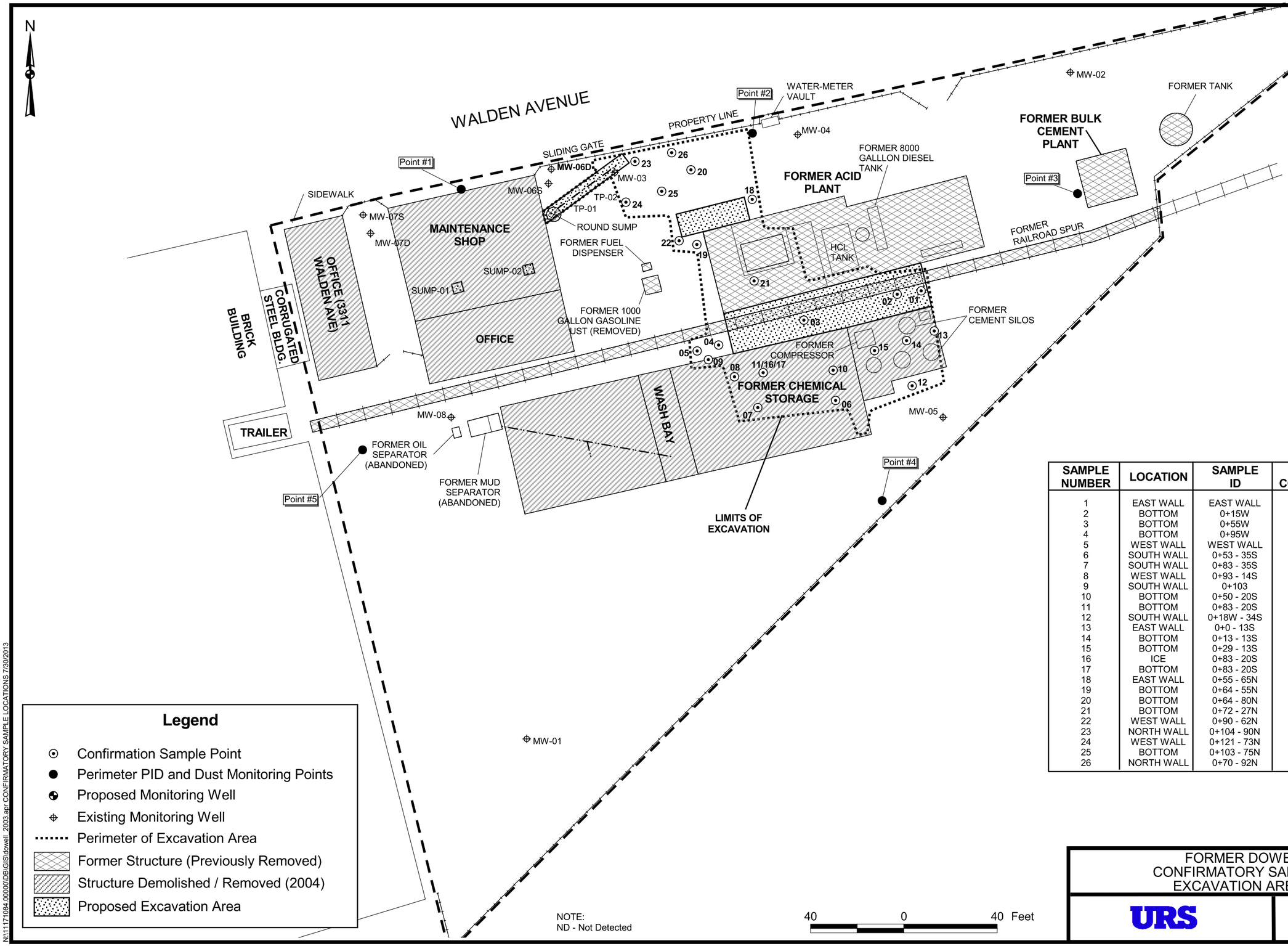
REMARKS

- Bentonite Seal
- Clean Filter Sand Pack
- 2" Sch 40 PVC Well Screen (0.010" Slot)
- PVC End Cap

ADDITIONAL REMARKS

E:\FORMATS\FORM

Attachment 2
Confirmatory Sample Locations



SAMPLE NUMBER	LOCATION	SAMPLE ID	TOTAL VOC CONCENTRATION (PPM)
1	EAST WALL	EAST WALL	ND
2	BOTTOM	0+15W	0.008
3	BOTTOM	0+55W	3.0
4	BOTTOM	0+95W	0.009
5	WEST WALL	WEST WALL	0.295
6	SOUTH WALL	0+53 - 35S	0.083
7	SOUTH WALL	0+83 - 35S	0.010
8	WEST WALL	0+93 - 14S	0.038
9	SOUTH WALL	0+103	0.026
10	BOTTOM	0+50 - 20S	6.5
11	BOTTOM	0+83 - 20S	27.0
12	SOUTH WALL	0+18W - 34S	0.017
13	EAST WALL	0+0 - 13S	ND
14	BOTTOM	0+13 - 13S	ND
15	BOTTOM	0+29 - 13S	ND
16	ICE	0+83 - 20S	0.038
17	BOTTOM	0+83 - 20S	7.060
18	EAST WALL	0+55 - 65N	1.028
19	BOTTOM	0+64 - 55N	ND
20	BOTTOM	0+64 - 80N	0.069
21	BOTTOM	0+72 - 27N	0.922
22	WEST WALL	0+90 - 62N	0.548
23	NORTH WALL	0+104 - 90N	1.2
24	WEST WALL	0+121 - 73N	0.255
25	BOTTOM	0+103 - 75N	ND
26	NORTH WALL	0+70 - 92N	0.404

Legend

- Confirmation Sample Point
- Perimeter PID and Dust Monitoring Points
- Proposed Monitoring Well
- Existing Monitoring Well
- Perimeter of Excavation Area
- Former Structure (Previously Removed)
- Structure Demolished / Removed (2004)
- Proposed Excavation Area

N:\11171094.00000\DB\GIS\dowell_2003.apr CONFIRMATORY SAMPLE LOCATIONS 7/30/2013

FORMER DOWELL FACILITY
CONFIRMATORY SAMPLE LOCATIONS
EXCAVATION AREAS (FEB 2004)

URS

FIGURE 6

Appendix B
Sitewide and Engineering Control Inspection Forms

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	Approximately 1-2 inches of snow across site from recent snowfall, but no signs of obvious subsidence, depressions or cracks observed. Vegetation in areas of soil/grass cover appears ok, and no signs of soil erosion or animal burrows observed.

Date: 3/20/24 **Inspector:** Dan Holmes

FORMER DOWELL FACILITY – DEPEW, NEW YORK
SITE MANAGEMENT PLAN

NYSDEC SITE NO. V-00410-9

SITE-WIDE INSPECTION FORM

Date: 3/20/24 **Inspector:** Dan Holmes

Weather: Cloudy, cold, light snow **Signature:** [signature]

Temperature: 32°F **Company:** Jacobs

Inspection Year: 2024

Item Inspected	Maintenance Needed (Y/N)	Comments
General Site Access	N	Some snow built up (~1-2 in) in front of entrance gate from recent snowfall, but otherwise entrance gate accessible and locked upon arrival.
Soil /Grass Cover	N	Approximately 1-2 inches of snow across site, but no issues with cover observed.
Security Fencing, Gates and Locks	N	Entrance gate locked w/ combination lock. Man gate in SW corner of site was open upon arrival, appears chain link may have been cut to allow gate to open. Repositioned chain link and securely locked w/ combination lock again.
Site Drainage	N	Approx. 1-2 inches of snow across site. No issues with site drainage observed.
Trees, Bushes, Other Vegetation	N	No issues with vegetation observed
Miscellaneous	N/A	None

Appendix C
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, 2023 to July 07, 2024

	YES	NO
1. Is the information above correct?	■	□
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?	□	■
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	□	■
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	□	■
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?	□	■

Box 2

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial	■	□
7. Are all ICs in place and functioning as designed?	■	□

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

SITE NO. V00410 **Box 3**

Description of Institutional Controls

Parcel	Owner	Institutional Control
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	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.

Box 4

Description of Engineering Controls

Parcel	Engineering Control
104.09-1-14	Cover System
104.09-1-15	Cover System

Box 5

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 compete.

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 (print name) at 2411 Dulles Corner Park, Suite 500 Herndon VA 20171 (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

7/5/2017
Date

STATE OF NEW YORK
KEY ROSEBROOK
LICENSED
069440-1
PROFESSIONAL ENGINEER

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 (print name) at 2411 Dulles Corner Park, Suite 500 Herndon, VA 20171 (print business address)

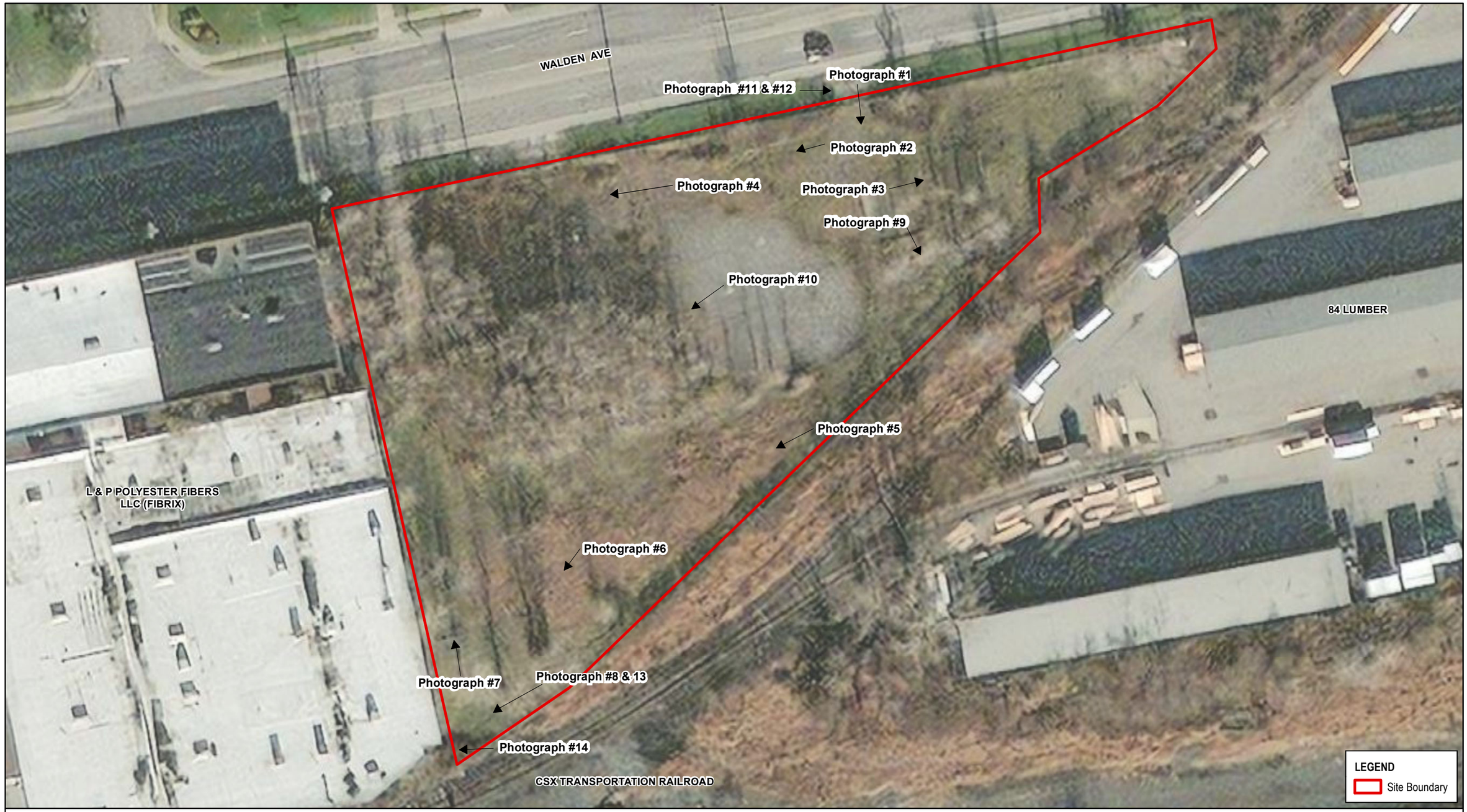
am certifying as a Qualified Environmental Professional for the Remedial Party (Owner or Remedial Party)

Signature of Qualified Environmental Professional, for the Owner or Remedial Party, Rendering Certification

State 1 (Required for PE)

Date

Appendix D
Photographs



Source:
Imagery: Esri World Imagery Basemap - 2021

N

0 25 50
Feet

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

CH2M HILL Engineers, Inc.

RDD \\DC1VS01\GISPROJ\D\DOWELL\DOWELL_DEPEW_480860\MAPFILES\2022\APPENDIX C - PHOTOGRAPH LOCATION MAP.MXD JHANSEN1 7/11/2022 4:46:42 PM

Site Inspection – March 2024	
Photographs	
Photograph Number: 1 Subject/Description: Photograph taken from site entrance area facing south	
Photograph Number: 2 Subject/Description: Photograph taken from eastern end area facing west	

Photographs	
Photograph Number: 3 Subject/Description: Photograph taken from eastern end area facing east	
Photograph Number: 4 Subject/Description: Photograph taken from central area facing west	

Photographs	
Photograph Number: 5 Subject/Description: Photograph taken along southern site boundary facing southwest	
Photograph Number: 6 Subject/Description: Photograph taken from southern corner area facing southwest	

Photographs	
Photograph Number: 7 Subject/Description: Photograph taken from southern corner facing north	
Photograph Number: 8 Subject/Description: Photograph taken from southern corner gate area (unlocked and open upon arrival) facing southwest	

Photographs	
Photograph Number: 9 Subject/Description: Photograph taken from eastern end area facing south	
Photograph Number: 10 Subject/Description: Photograph taken from central area facing west	

Photographs	
Photograph Number: 11 Subject/Description: Photograph taken along northern site boundary facing east-southeast	
Photograph Number: 12 Subject/Description: Photograph taken of main entrance gate (locked) facing east-southeast	

Photographs	
Photograph Number: 13 Subject/Description: Photograph taken from southern corner gate area (locked before departing) facing west	
Photograph Number: 14 Subject/Description: Photograph taken of southern corner gate (locked) facing west	

SECTION 7

Works Cited

CH2M HILL Engineers, Inc. (CH2M). 2018. *Periodic Review Report (July 7, 2017 through July 7, 2018). Former Dowell Depew Facility 311 Walden Avenue, Depew, New York*. August.

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). 2024. *Periodic Review Report (July 7, 2022 through July 7, 2023). Former Dowell Depew Facility 311 Walden Avenue, Depew, New York*. January.

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

New York State Department of Environmental Conservation (NYSDEC). 2024. Personal communication (email) with Anne Nea. June 12.

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.