# Periodic Review Report

(July 7, 2024 through July 7, 2025)

Former Dowell Facility

3311 Walden Avenue, Depew, New York

**July 2025**

Prepared for:

Schlumberger and DOW

Prepared by:

CH2M HILL Engineers, Inc.

Schlumberger

**Ms. Kelly Sperbeck**
Remediation Manager
Schlumberger Technology Corporation
701 W 8th Avenue, Suite 600
Anchorage, AK 99501
Tel: (907) 223-0379

July 9, 2025

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, 2024, through July 7, 2025), 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 (907) 223-0379. I can also be reached by email at ksperbeck@slb.com.

Sincerely,

Kelly Sperbeck
Remediation Manager

c: Benjamin Mcpherson/New York State Department of Environmental Conservation
Sarita Wagh/New York State Department of Health
Sara Bogardus/New York State Department of Health
Meredith Harris/The Dow Chemical Company
Monica Schneider/CH2M HILL Engineers, Inc.
Anne Nea/CH2M HILL Engineers, Inc.
Glynn Roberts/CH2M HILL Engineers, Inc.

# Periodic Review Report
# (July 7, 2024, through July 7, 2025)

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 The Dow Chemical Company

July 2025

*Prepared by*
CH2M HILL Engineers, Inc.

# Executive Summary

On behalf of the Volunteers (Schlumberger Technology Corporation and The Dow Chemical Company), 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, 2024, to July 7, 2025. The June 2025 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



**Appendixes**



**Table**



**Figures**

# Abbreviations and Acronyms

| | |
|---|---|
| AST | aboveground storage tank |
| bgs | below ground surface |
| 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 The Dow Chemical Company |

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 The Dow Chemical Company) 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 of the site in the area of monitoring well MW-02 was not thoroughly investigated and that further assessment should be completed to confirm remaining soil is below NYSDEC's soil cleanup objectives to meet the site cover requirements. A response was provided to NYSDEC on July 12, 2024, and NYSDEC accepted the Volunteers responses in an email dated February 6, 2025, with no further comments or questions.

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 of Covenants and Restrictions 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 in Figure 1-2. This EC soil cover is composed of washed gravel in the bottom 14 to 15 feet below ground surface (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 June 23, 2025. 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, but the lock was rusted closed. The lock was cut and replaced with a new lock. The man gate in the southwestern corner of the site was open upon arrival. It appeared that the chain had been cut. The chain was repositioned, and the gate was resecured with the combination lock. No evidence of trespassing impacting the remedy was noted.

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

Appendix D contains photographs from the sitewide inspection.

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, 2024, through July 7, 2025, reporting period. The June 2025 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 were not conducted during or immediately after a precipitation event. Also, NYSDEC was notified about the site inspection on June 12, 2025, 11 days prior to conducting the inspections.

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.

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

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.<br>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. |
| July 2024 | The twelfth Periodic Review Report was submitted and presented a summary of the remedy performance during the period from July 7, 2023, through July 7, 2024. |

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

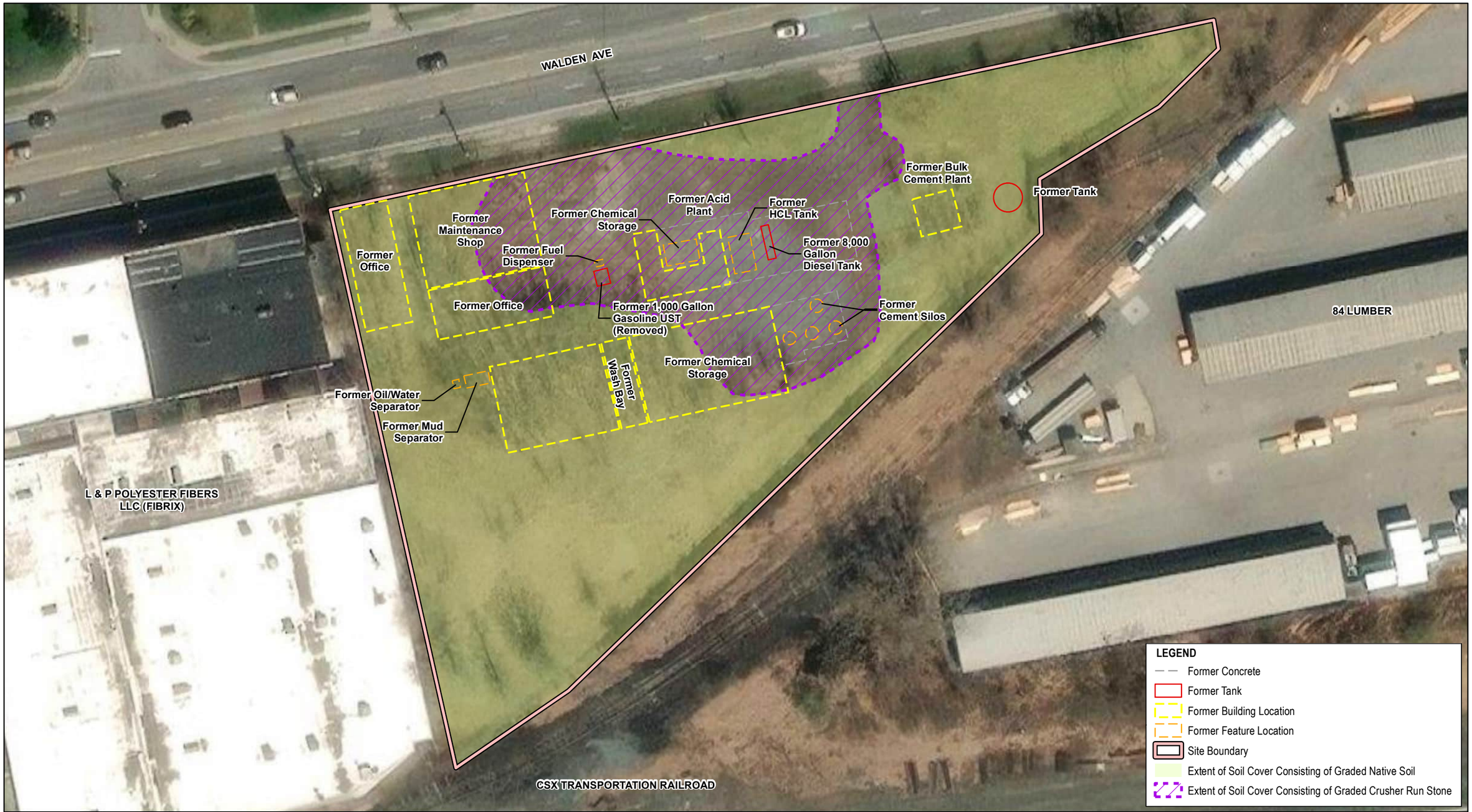
0 500 1,000

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
# 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:<br>Obvious subsidence, depressions or cracks.<br>Evidence of ponded water<br>Stressed or missing vegetation<br>Soil erosion due to surface runoff<br>Animal burrows<br>Any other visible issues | Soil/grass cover appears in good condition, slightly overgrown in some areas. No visible signs of cracks, depressions, or animal burrows. No evidence of ponded water. No signs of subsidence or soil erosion. Vegetation does not appear stressed and is in place across site |
| | | |

**Date:** 6/23/25 **Inspector:** Daniel Holmes

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

**NYSDEC SITE NO. V-00410-9**

## SITE-WIDE INSPECTION FORM

**Date:** 6/23/25 **Inspector:** Daniel Holmes

**Weather:** Sunny, hot, humid **Signature:** [signature]

**Temperature:** 75°F **Company:** CH2M Hill Engineers, Inc.

**Inspection Year:** 2025

| Item Inspected | Maintenance Needed (Y/N) | Comments |
|---|---|---|
| General Site Access | N | Entrance and gate clear and accessible |
| Soil /Grass Cover | N | Soil/grass cover and gravel covering middle portion of site appear intact and in good condition |
| Security Fencing, Gates and Locks | N* | * Entrance gate combination lock was rusted shut upon arrival. Needed to cut chain and put new combination lock in place to access site. Man gate in SW corner of site was also open upon arrival, resecured closed with chain and combination lock there as well. No further issues once locks put back in place on both gates. |
| Site Drainage | N | No issues with site drainage observed. |
| Trees, Bushes, Other Vegetation | N | Vegetation in general appears in good condition. Vegetation and grass overgrown in some areas. |
| Miscellaneous | N/A | None |
| | | |

# 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, 2024 to July 07, 2025

| | 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<br>Landuse Restriction<br>Monitoring Plan<br>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<br>Landuse Restriction<br>Monitoring Plan<br>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 at 2411 Dulles Corner Park, Suite 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 7/11/2025
Signature of Owner, Remedial Party, or Designated Representative Rendering Certification Date

STATE OF NEW YORK
KEY ROSEBROOK
089440-1
LICENSED 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)


Key Rosebrook — 7/7/2025

Signature of Qualified Environmental Professional, for the Owner or Remedial Party, Rendering Certification — Stamp (Required for PE) — Date

# Appendix C
# Photographs

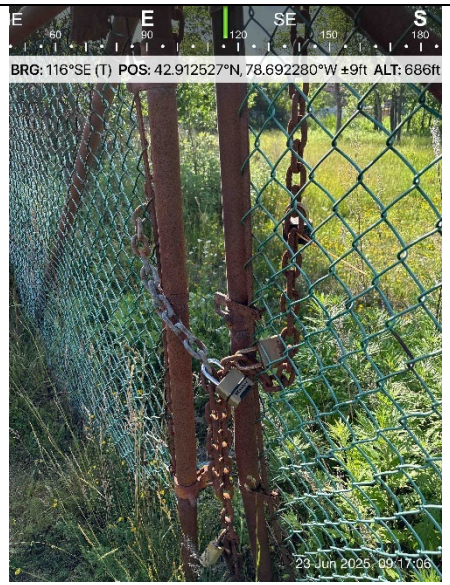
| Site Inspection – June 2025 | |
|---|---|
| Photographs | |
| Photograph Number: 1<br>Subject/Description: Photograph taken from site entrance area facing south |  |
| Photograph Number: 2<br>Subject/Description: Photograph taken from eastern end area facing west-southwest |  |

| Photographs | |
|---|---|
| Photograph Number: 3<br>Subject/Description: Photograph taken from eastern end area facing east |  |
| Photograph Number: 4<br>Subject/Description: Photograph taken from central area facing southwest |  |

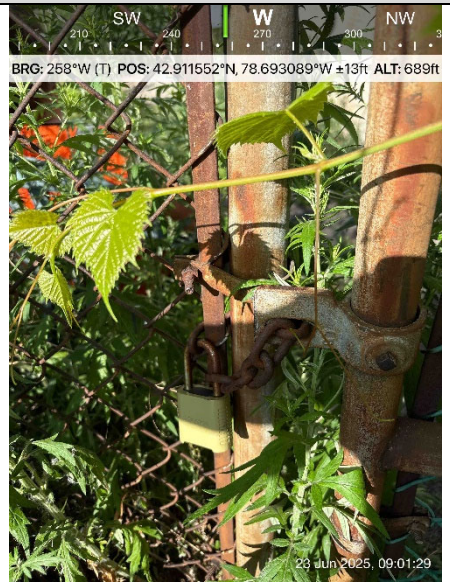
| Photographs | |
|---|---|
| Photograph Number: 5<br>Subject/Description: Photograph taken along southern site boundary facing southwest |  |
| Photograph Number: 6<br>Subject/Description: Photograph taken from southern corner area facing southwest |  |

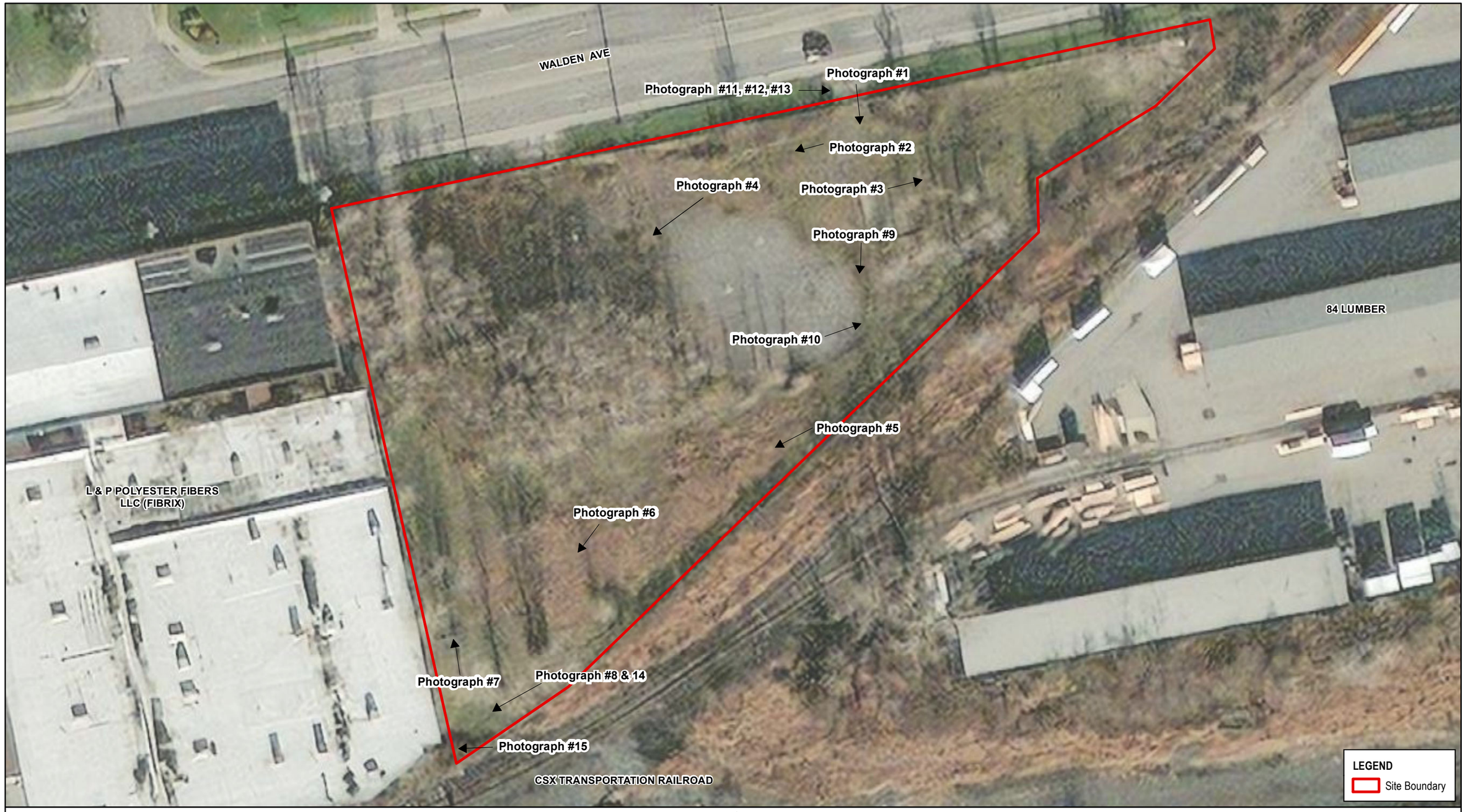
| Photographs | |
|---|---|
| Photograph Number: 7<br>Subject/Description: Photograph taken from southern corner facing north-northwest |  |
| Photograph Number: 8<br>Subject/Description: Photograph taken from southern corner gate area (unlocked and open upon arrival) facing southwest |  |

| Photographs | |
|---|---|
| Photograph Number: 9<br>Subject/Description: Photograph taken from eastern end area facing south |  |
| Photograph Number: 10<br>Subject/Description: Photograph taken from eastern end area facing northeast |  |
| Photographs | |

| | |
|---|---|
| Photograph Number: 11<br>Subject/Description: Photograph taken of main entrance gate upon arrival (rusted lock) facing east-southeast |  |
| Photograph Number: 12<br>Subject/Description: Subject/Description: Photograph taken of main entrance gate upon leaving site (new lock) facing east-southeast |  |

| Photographs | |
|---|---|
| Photograph Number: 13<br>Subject/Description: Photograph taken along northern site boundary of main entrance gate (locked) upon leaving site facing east-southeast |  |
| Photograph Number: 14<br>Subject/Description: Photograph taken from southern corner gate area (locked before departing) facing west-southwest |  |

| Photographs | |
|---|---|
| Photograph Number: 15<br>Subject/Description: Photograph taken of southern corner gate (locked) facing west |  |




**Source:**
*Imagery: Esri World Imagery Basemap - 2021*

N

0 25 50
Feet

**Appendix C.**
**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