285 Delaware Avenue, Suite 500 Buffalo, New York 14202 United States ghd.com



Your ref: C915200 Our ref: 12615780

September 29, 2023

Ms. Megan Kuczka New York State Department of Environmental Conservation 700 Delaware Avenue Buffalo, NY 14209

Annual Periodic Review Report, Former NL Industries Site No. C915200

Dear Ms. Kuczka:

GHD Consulting Services, Inc. (GHD) on behalf of Cascades Containerboard Packaging, a Division of Cascades Canada ULC, is submitting the attached Institutional and Engineering Controls Certification Form and the annual Periodic Review Report (PRR) for the Former NL Industries Site in Depew, New York.

Please contact me at 716-362-8839 should you have any questions or require additional information.

Regards,

Katherine Galanti Project Manager

+1 716 362-8839

katherine.galanti@ghd.com

Katterin B. Salanti

Attachments

Copy to: L. Marineau, Cascades

R. Snyder, GHD



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



Sit	e No.	C915200	Site Details		Box 1	
Sit	e Name Fo	ormer NL Industries Fou	ındry			
Cit Co	e Address: y/Town: Ch ounty: Erie e Acreage:		Zip Code: 14043			
Re	porting Peri	od: August 31, 2022 to A	August 31, 2023			
					YES	NO
1.	Is the infor	mation above correct?			×	
	If NO, inclu	ude handwritten above or	on a separate sheet.			
2.		or all of the site property mendment during this Re	been sold, subdivided, merged, or υ porting Period?	undergone a		×
3.		been any change of use a CRR 375-1.11(d))?	at the site during this Reporting Peri	od		×
4.	•	federal, state, and/or loca e property during this Re	ll permits (e.g., building, discharge) porting Period?	been issued		×
			s 2 thru 4, include documentation viously submitted with this certifi			
5.	Is the site	currently undergoing dev	elopment?			×
					Box 2	
					YES	NO
6.	Is the curre	ent site use consistent wi	th the use(s) listed below?		×	
7.	Are all ICs	in place and functioning	as designed?	×		
	IFT		QUESTION 6 OR 7 IS NO, sign and HE REST OF THIS FORM. Otherwise		and	
A	Corrective N	leasures Work Plan mus	t be submitted along with this form	to address ti	hese iss	ues.
Sig	gnature of Ov	vner, Remedial Party or De	esignated Representative	Date		

		Box 2	Α
		YES	NO
8.	Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?		×
	If you answered YES to question 8, include documentation or evidence that documentation has been previously submitted with this certification form.		
9.	Are the assumptions in the Qualitative Exposure Assessment still valid? (The Qualitative Exposure Assessment must be certified every five years)	×	
	If you answered NO to question 9, the Periodic Review Report must include an updated Qualitative Exposure Assessment based on the new assumptions.		

SITE NO. C915200 Box 3

Description of Institutional Controls

<u>Parcel</u> <u>Owner</u> <u>Institutional Control</u>

104.09-5-1 Cascades Containerboard Packaging

Ground Water Use Restriction Soil Management Plan Landuse Restriction Monitoring Plan Site Management Plan

[For details- see Section 5 in the Site Management Plan, dated October 16, 2009] Environmental Easement is included in the FER in Appendix E. The Easement was recorded with the Erie County Clerk on 12/1/2009.

- (i) Prohibition of groundwater use.
- (ii) Restrictions on property use.
- (iii) Maintenance of cover on the containment cell.
- (iv) Maintenance of asphalt cover over trucking yard, eastern parking lot, and rail siding areas.
- (v) Maintenance of concrete cover in the building and apron areas.

Box 4

Description of Engineering Controls

Parcel <u>Engineering Control</u>

104.09-5-1

Cover System

Fencing/Access Control

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, ar reviewed by, the party making the Engineering Control certification;	nd
	 b) to the best of my knowledge and belief, the work and conclusions described in this certi are in accordance with the requirements of the site remedial program, and generally accep engineering practices; and the information presented is accurate and compete. YES	
	×	
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 hea the environment;	alth and
	(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, to mechanism remains valid and sufficient for its intended purpose established in the document for i	
	YES N	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 issue	es.
	Signature of Owner, Remedial Party or Designated Representative Date	

IC CERTIFICATIONS SITE NO. C915200

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.

GHD Consulting Services, Inc.
2055 Niagara Falls Blvd., Niagara Falls, NY 14304, print name

print name

print business address

am certifying as Owner's Representative

(Owner or Remedial Party)

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

Signature of Owner, Remedial Party, or Designated Representative

Rendering Certification

GHD Consulting Services, Inc.
2055 Niagara Falls Blvd., Niagara Falls, NY 14304, print business address

(Owner or Remedial Party)

EC CERTIFICATIONS

Box 7

Professional Engineer 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.

Richard J. Snyder, P.E.

GHD Consulting Services, Inc. at 2055 Niagara Falls Blvd., Niagara Falls, NY 14304

print name

print business address

am certifying as a Professional Engineer for the Owner

Remedial Party)

Signature of Professional Engineer, for the Owner or

Remedial Party, Rendering Certification

(Required for PE)



2023 Periodic Review Report

Former NL Industries Foundry, NYSDEC Site No. C915200

Cascades Holding US Inc.

September 29, 2023

→ The Power of Commitment

Project na	ıme	Cascades 2023 PRR						
Document title		2023 Periodic Review Report Former NL Industries Foundry, NYSDEC Site No. C915200						
Project number		12615780						
File name		12615780-RPT1-2023 PRR.docx						
Status	Revision	Author	Reviewer	Reviewer		Approved for issue		
Code			Name	Signature	Name	Signature	Date	
S2	0	Mary Kate Mooney	Katherine Galanti	Spetteri & Speterti	Rich Snyder	Ruled John	9/29/23	
[Status code]								
[Status code]								
[Status code]								
[Status code]								

GHD 337

Contact: Katherine Galanti, Project Manager | GHD

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[Compliance statement]

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Table of Contents

1.	Intro	duction	1
	1.1	Purpose of this Report	1
	1.2	Scope and Limitations	2
2.	Engir	neering and Institutional Controls	2
	2.1	Engineering Controls (ECs)	2
	2.2	Institutional Controls (ICs)	2
3.	Inspe	ections and Maintenance Activities	3
	3.1	Asphalt-Only Cover System	4
		3.1.1 Trucking Yard	4
		3.1.2 Parking Lot	4
		3.1.3 Former Rail Siding	4
	3.2	Building and Apron Cover System	4
	3.3	GCL and Asphalt Cover System	4
	3.4	GCL and Soil Cover System	5
	3.5	Retention Pond	5
	3.6	Fencing	5
	3.7	Vegetative Cover	5
	3.8	General Site Appearance	5
4.	Grou	ndwater Monitoring	6
5.	Conc	clusions and Recommendations	6
6.	Certif	fication	7

Figure Index

Figure 1.1	Site Location Map
Figure 2.1	Site Layout
Figure 2.2	Location of Engineering Control Systems

Appendices

Appendix A	Site Inspection Form
Appendix B	Photographs

1. Introduction

The former NL Industries Foundry (Site) is located at 3241 Walden Avenue in Depew, New York (Figure 1.1). The property and facility are currently owned and operated by Cascades Recovery Plus, a Division of Cascades Holding US Inc. (Cascades). Remediation of the Site was completed in 2008 under the oversight of the New York State Department of Environmental Conservation (NYSDEC) in accordance with Brownfield Cleanup Agreement (BCA) Index #B9-0554-98-12, Site #C915200.

The final remedial alternative for the Site, as described in the SMP dated October 2009, included the following components:

- 1. Excavation of impacted soils from the western section of the Site and consolidation within a containment cell constructed within the central portion of the Site.
- 2. Capping of the containment cell with imported clean fill, geo-synthetic clay liner (GCL), and soil/vegetative or asphalt cover.
- Construction of a GCL and soil cover system on all non-paved areas of the containment cell (i.e., side slopes).
- 4. Construction of a GCL and asphalt cover system on all paved areas of the containment cell.
- 5. Execution and recording of an Environmental Easement to restrict land use and prevent future exposure to remaining impacted materials for the central and eastern portions of the Site.
- 6. Development and implementation of a Site Management Plan (SMP) for long-term management of the engineering controls (ECs) and institutional controls (ICs) in place at the Site.

The SMP, designed to serve as a work plan for Site monitoring and maintenance, was developed upon completion of the remedial construction and approved by the NYSDEC in October 2009. The SMP was updated in 2021 to document new Site ownership and contact information, and again in January 2023 to reflect changes to the groundwater monitoring program. The NYSDEC accepted the revisions in a letter dated February 2, 2023.

1.1 Purpose of this Report

This Periodic Review Report (PRR) is being prepared to certify that Site management activities are being conducted in accordance with the SMP.

This report presents the results of the Site inspection conducted in August 2023, including a review of recordkeeping conducted through August 2023. The report is organized as follows:

- Section 1 Introduction: The background and brief remedial history of the Site.
- Section 2 Engineering and Institutional Controls: The ECs/ICs for this Site are described.
- Section 3 Inspections and Maintenance Activities: Activities performed during the current reporting period and their results.
- Section 4 Groundwater Monitoring: Discussion of groundwater monitoring data and analytical results generated from the current monitoring period.
- Section 5 Conclusions and Recommendations: Conclusions and recommendations based upon the data and results of the current monitoring period.

1.2 Scope and Limitations

This report: has been prepared by GHD for Cascades Holding US Inc. and may only be used and relied on by Cascades Holding US Inc. for the purpose agreed between GHD and Cascades Holding US Inc. as set out in section 1.1 of this report.

GHD otherwise disclaims responsibility to any person other than Cascades Holding US Inc. arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

2. Engineering and Institutional Controls

Engineering controls are required to protect human health and the environment because impacted fill is still present below various structures at the Site. Figure 2.1 shows the Site layout, and Figure 2.2 shows the various EC systems in place at the Site.

2.1 Engineering Controls (ECs)

The purpose of the EC systems is to eliminate the potential for human contact with fill material, prevent percolation of precipitation through the impacted fill and eliminate the potential for contaminated runoff from the Site. The EC systems in place at the Site consist of the following:

- Asphalt Only: The trucking yard within the east-central section of the Site was paved in 2004 and is covered by 4.5 inches of sub-base material and 6 inches of asphalt (4.5 inches binder coat and 1.5 inches topcoat). The eastern parking lot was historically paved with asphalt for employee parking and was repaved in August 2011. In addition, the area identified as the "rail siding area" was paved with 6 inches of asphalt (4 inches binder coat and 2 inches topcoat) in August 2008.
- Building and Apron Concrete: The concrete floor of the existing building and exterior concrete pads/aprons are believed to be a minimum of 6 inches in thickness.
- GCL and Soil: All non-paved areas (side slopes) of the containment cell are covered by approximately 12 inches of clean soil underlain by a GCL covering with a 6-inch sand layer between the GCL and impacted fill.
 All exposed environmentally clean soil/fill has been planted with grass as an erosion control methodology.
- GCL and Asphalt: All paved areas of the central section containment cell are covered by 6 inches of asphalt (4 inches binder coat and 2 inches topcoat) underlain by 12 inches of clean fill, followed by a GCL covering with a 6-inch sand layer between the GCL and the impacted fill.

2.2 Institutional Controls (ICs)

The purpose of the ICs is to:

- Implement, maintain, and monitor the ECs.
- Prevent future exposure to remaining on-Site contamination by controlling disturbance of the subsurface contamination.
- Limit the use and development of portions of the Site to industrial uses only.

The ICs that have been established for the Site must be:

- In compliance with the Environmental Easement and the SMP by the Grantor (currently Cascades Recovery Plus, a Division of Cascades Holdings US Inc.) and the Grantor's successors and assigns.
- Operated and maintained, as specified in the SMP.
- Inspected at a frequency and in a manner defined in the SMP.

Data and information pertinent to management of the Site must be reported at the frequency and in a manner defined in the SMP.

Adherence to the ICs is required by the Environmental Easement. The ICs may not be discontinued without an amendment to or extinguishment of the Environmental Easement. In addition, the Site has a series of ICs in the form of site restrictions, as required by the Environmental Easement. Restrictions that apply to the Site are:

- The central and eastern portions of the property may only be used for commercial/industrial purposes provided that the long-term ECs/ICs included in the SMP are employed.
- The central and eastern portions of the property may not be used for a higher level of use, such as unrestricted or restricted residential use without additional remediation and amendment of the Environmental Easement, as approved by the NYSDEC.
- All future activities on the property that will disturb remaining impacted material must be conducted in accordance with the SMP.
- The Site owner or remedial party will submit to the NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Site are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; (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.
- The groundwater beneath the central and eastern sections of the property may not be used for potable or non-potable purposes.

3. Inspections and Maintenance Activities

A comprehensive Site-wide inspection is required to be conducted annually, as specified in the SMP. The intent of the annual inspection is to determine whether:

- The ECs continue to perform as designed.
- The ECs continue to be protective of human health and the environment.
- The Site is operated and maintained in compliance with the SMP and Environmental Easement.
- The remedial performance criteria have been achieved.
- Sampling and analysis of appropriate media were conducted.
- Site records are complete and current.
- Changes to the remedial systems or monitoring are needed.

The annual comprehensive Site inspection was conducted by GHD personnel in accordance with the requirements of the SMP on August 23, 2023. The following sections discuss the findings of the 2023 inspection. The completed Site Inspection Form is provided as Appendix A.

3.1 Asphalt-Only Cover System

The three areas of asphalt-only cover consist of the Trucking Yard (west of the main building), Parking Lot (east of the main building), and Former Rail Siding (south of the main building), as shown on Figure 2.2. The areas of asphalt-only cover were visually inspected for cracks, deterioration, and protruding vegetation.

3.1.1 Trucking Yard

The asphalt surface in the trucking yard continues to exhibit clusters of cracking, although the condition appears consistent with the 2022 inspection. No asphalt is currently missing nor is vegetation protruding: however, the severity of cracking warrants more significant action than crack sealing. Resurfacing is needed to prevent more significant deterioration that would require replacement of the blacktop. Photos of the trucking yard are provided in Appendix B.

Resurfacing of the trucking yard is recommended before the next reporting period and is targeted to be completed by July 31, 2024, subject to weather and contractor availability. Cascades will notify NYSDEC of the actual schedule once a contractor has been selected.

3.1.2 Parking Lot

The Parking Lot was repayed in 2011 and is generally free of cracks and deterioration with no protruding vegetation. Photos of the pavement are provided in Appendix B.

No corrective action is necessary for the parking lot at this time.

3.1.3 Former Rail Siding

The asphalt cover on the Former Rail Siding was generally free of cracks and deterioration with no protruding vegetation and appeared in good condition. Photos of the pavement are provided in Appendix B.

No corrective action is necessary for the former rail siding at this time.

3.2 Building and Apron Cover System

The building foundation and apron concrete were visually inspected for cracks and deterioration. The floor within the building is solid with no open penetrations. The building foundation is in good condition. Cracks and areas of missing concrete were observed on the concrete dock apron system; however, these were either filled with asphalt cold patch or tar sealant to prevent further water intrusion and damage from freeze/thaw cycles. While the tipping floor dock (center dock/apron area) and back dock (south dock/apron area) concrete aprons may eventually require replacement, the asphalt filling and tar sealing is sufficient to prevent potential exposure to underlying contaminated soil. Photos of the concrete aprons are provided in Appendix B.

While no corrective action is immediately necessary, routine monitoring and maintenance of the concrete aprons is required in lieu of replacement.

3.3 GCL and Asphalt Cover System

The GCL and asphalt cover system was visually inspected as part of the annual comprehensive Site inspection. No areas of subsidence or exposed GCL were observed. Minor surface indentations caused by tractor-trailer supports were noted in the asphalt, consistent with past years. The indentations were approximately 0.25 to 0.5 inch in depth, but do not affect the integrity of the cap. Photos of the GCL and asphalt cover are provided in Appendix B.

No corrective action is necessary for the GCL and asphalt cover system at this time.

3.4 GCL and Soil Cover System

The GCL and soil cover system was visually inspected as part of the annual comprehensive Site inspection. No areas of subsidence, erosion, or exposed GCL were observed. At the time of the inspection, the grass was approximately 2 inches in length and was regularly maintained. A small area of grass/soil on the south slope observed during the 2022 inspection to have been gouged by a dislodged boulder was rolled after the 2022 inspection to level the area. Vegetation re-established during the current growing season. Photos of the GCL and soil cover are provided in Appendix B.

No corrective action is necessary for the GCL and soil cover system at this time.

3.5 Retention Pond

The retention pond was inspected semiannually by Cascades staff and as part of the annual comprehensive Site inspection by GHD. Little to no standing water was present in the pond at the time of the Site inspection. Significant plant growth is present within the pond, primarily invasive phragmites. Some individual and small clusters of phragmites were observed growing outside the stone perimeter of the pond. No other debris was observed, and the outlet pipes were open. No evidence of erosion was observed along the banks of the pond. The outlet pipes from the pond were clear of obstructions. Photos of the retention pond are provided in Appendix B.

No corrective action is necessary for the retention pond at this time.

3.6 Fencing

The fencing was inspected semiannually by Cascades staff and as part of the annual comprehensive Site inspection by GHD. The fencing appeared in good condition, with encroaching vegetation along the south fence line having been removed. The fence north of the Site along Walden Avenue was constructed with braided wire rather than a top support pole. At the time of the inspection, the wire provided sufficient support for the fence. Photos of the fencing are provided in Appendix B.

No corrective action is necessary with regard to Site fencing at this time.

3.7 Vegetative Cover

The vegetative cover was inspected semiannually by Cascades staff and as part of the annual comprehensive Site inspection by GHD. No areas of distressed vegetation, invasive species, or woody growth were observed. The gouged area observed during the 2022 inspection has re-established. Photos of the vegetative cover are provided in Appendix B.

No corrective action is necessary with regard to the vegetative cover at this time.

3.8 General Site Appearance

Overall, housekeeping was much better than in 2022, although some paper and plastic waste was apparent around roll-off boxes and the tipping floor door, as well as along the perimeter fence and the rail siding. Continued vigilance is recommended to reduce nuisance litter from accumulating around the perimeter fence and rail siding or being carried from the Site by vehicles or wind.

4. Groundwater Monitoring

In accordance with the revised SMP, groundwater monitoring is conducted on a triennial schedule. The last groundwater monitoring event was completed in 2022 and is not required for the current reporting period. The next groundwater sampling event will be completed in 2025.

5. Conclusions and Recommendations

The annual inspection and monitoring activities performed during this reporting period found that:

- The asphalt only cover system is generally in good condition but needs resurfacing of the trucking yard to
 prevent deterioration. Resurfacing is targeted to be completed by July 31, 2024, subject to weather and
 contractor availability. Cascades will notify NYSDEC of the actual schedule once a contractor has been
 selected.
- Areas of the concrete apron cover system where significant wear, holes, and cracking were observed were patched/sealed with asphalt and/or tar in 2023 as part of routine maintenance.
- The GCL and soil and GCL and asphalt cover systems are generally in good condition with no deficiencies noted.
- Perimeter fencing is in good condition.
- While there is significant vegetation (phragmites) growth within the pond, the outlet pipes are not obstructed, so no action is required.
- Continued vigilance is necessary to ensure paper and plastic debris does not accumulate around the perimeter of the property.

Based on these observations, it is concluded that the remedial action continues to be effective.

6. Certification

For each institutional or engineering control identified for the site, I certify that all of the following statements are true:

- The inspection of the Site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under my direction.
- Except as indicated in this report, the institutional controls and/or engineering controls employed at this Site
 are unchanged from the date the control was put in place or last approved by the Department.
- Nothing has occurred that would impair the ability of the control to protect the public health and environment.
- Nothing has occurred that would constitute a violation or failure to comply with the SMP for this control.
- 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.
- Use of the Site is compliant with the environmental easement.
- The engineering control systems are performing as designed and are effective.
- 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.

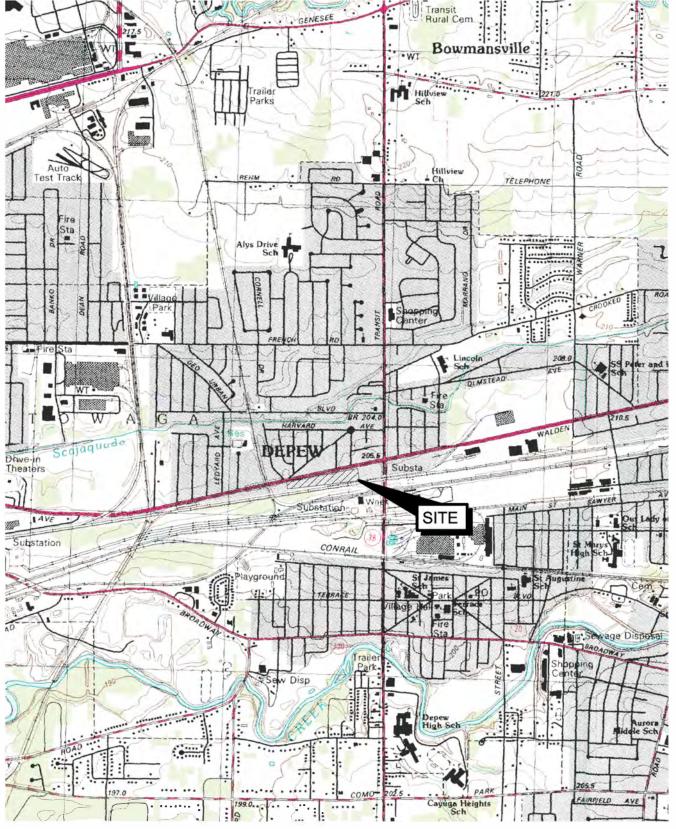
The information presented in this report is accurate and complete.

Richard J. Snyder, F.E

GHD Consulting Services, Inc. 2055 Niagara Falls Blvd., Suite 3

Niagara Falls, New York 14304

Figures



SOURCE : USGS QUADRANGLE MAP: LANCASTER, NEW YORK



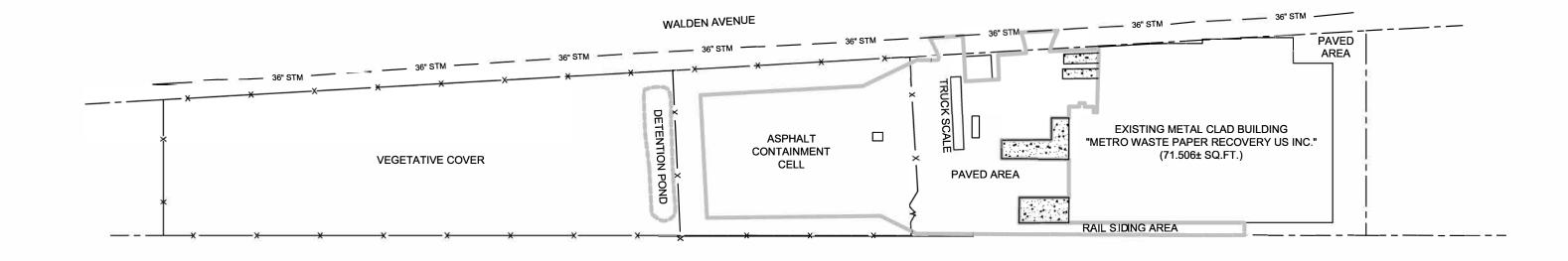




FORMER N.L. INDUSTRIES SITE REMEDIATION
3241 WALDEN AVENUE
DEPEW, NEW YORK
SITE LOCATION MAP

Project No. 12590773 Report No. 2023 PRR Date SEP 2023

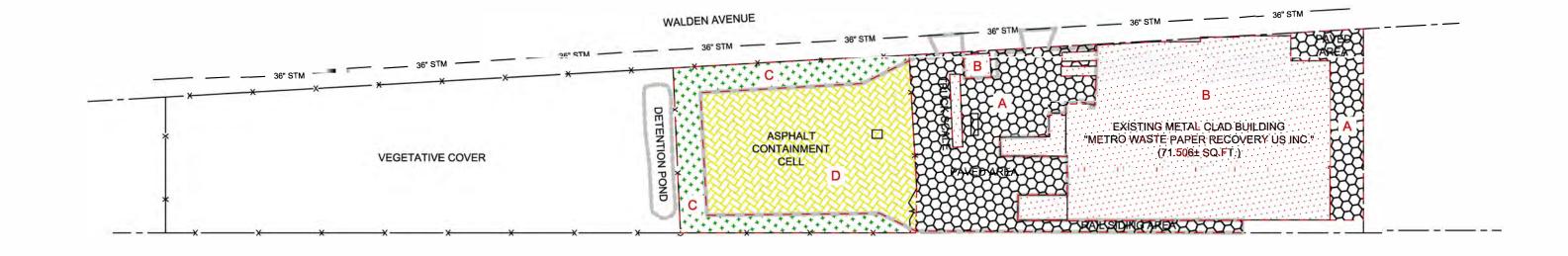
FIGURE 1.1





FORMER N.L. INDUSTRIES SITE REMEDIATION
3241 WALDEN AVENUE
DEPEW, NEW YORK
SITE LAYOUT

Project No. 12590773 Report No. 2023 PRR Date SEP 2023



LEGEND;

COVER SYSTEM A - ASPHALT ONLY

COVER SYSTEM B - BUILDING & APRON CONCRETE

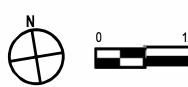


COVER SYSTEM C - GEOSYNTHETIC CLAY LINER & SOIL



COVER SYSTEM D - GEOSYNTHETIC CLAY LINER, SOIL, & ASPHALT (CONTAINMENT CELL)

SOURCE: DRAWING FILE (MWL-126254-01.dwg) FROM TIGHE & BOND (MIDDLETOWN, CONNECTICUT)





FORMER N.L. INDUSTRIES SITE REMEDIATION 3241 WALDEN AVENUE DEPEW, NEW YORK

LOCATION OF ENGINEERING CONTROL SYSTEMS

Project No. 12590773 Report No. 2023 PRR Date SEP 2023

FIGURE 2.2

Appendices

Appendix A

Site Inspection Form

Former N.L 3241 Walde Depew, NY							
Page 1 of 5							
Name of In Date of Ins	spector: pection:	KAT 8/	HY GALANT 23/2023				
The purpose of this inspection is to monitor the overall integrity of the containment cell, the site wide paving and the building foundation. Please take photographs from all four sides of the containment cell cap, as well as the asphalt pavement and building foundation to document the existing conditions of the consolidated soil area, erosion control technologies in place, and the immediate surrounding area each week. Please fill out the following inspection items. If at any time impacted fill material has been exposed, please notify the Project Manager listed in the SMP immediately.							
Monitoring	_		_				
Condition o	T MONITO	ring we	ells				
	Good	Fair	Needs Repair	Details			
MW-101	/			SULFACE INSPECTION ONLY.			
MW-102	+			NO SAMPLING IN 2023. NEXT			
MW-103	T			ENENT IN 2025.			
MW-104							
MW-105							
MW-106	MW-106						
Asphalt Or	nly Cove	er Syst	<u>em</u>				
Are there any obvious areas of damage to the asphalt in the trucking yard?							
YES NO If yes, please describe Surficial Cracis.							

Former N.L. Industries 3241 Walden Avenue Depew, NY

Page 2 of 5

Asphalt Only Cover System

Are there any obvious areas of damage to the asphalt in the parking lot? YES NO If yes, please describe				
Tes E 11 yes, piease describe				
Are there any obvious areas of damage to the asphalt in the former rail siding area				
YES NO If yes, please describe				
Building and Apron Concrete Cover System				
Are there any obvious areas of damage to the building's foundations?				
YES NO If yes, please describe				
Are there any obvious areas of damage to any concrete pads?				
YES NO If yes, please describe PREVIOUSLY IDENTIFIED PATCHES				
PATCHES W/ ASPHALT. CRACKS/SEAMS HAVE BEEN TARRED.				
GCL and Soil Cover System				
Are there any signs of soil run-off or erosion on the sides of the containment cell?				
YES NO If yes, please describe				

Former N.L. Industries 3241 Walden Avenue Depew, NY

Page 3 of 5

GCL and Soil Cover System

Are there any areas of exposed GCL?
YES NO If yes, please describe
Has the grass appeared to have been mowed at a regular basis during the previous growing season?
YES NO If yes, please describe GASS ~ 2" IN HUNHT.
Are there any woody types plants growing within the this Cover System?
YES NO If yes, please describe
GCL and Asphalt Cover System
Are there any obvious areas of damage to the asphalt within this cover system?
YES NO If yes, please describe
Are there any obvious signs of cracking within this cover system?
YES NO If yes, please describe

Former N.L. Industries 3241 Walden Avenue Depew, NY

Page 4 of 5

Pο	n	d

Is there standing water in the retention pond?
YES NO I If yes, approximately how much? NO APPARENT STANDING WARRAT TIME OF INSPECTION. PHRAMMITES LIKELY AIDING IN ABSORDED.
Is there any debris within the retention pond?
YES NO I If yes, please describe ORHANIC PLANT MATTER
Is the inlet and outlet of the retention pond free of debris? YES NO If no, please describe
Is there any sign of erosion along the banks of the retention pond?
YES NO If yes, please describe
<u>Vegetatives</u>
Is there any sign of distress, disease or die off of the vegetatives associated with th cover systems?
YES NO If yes, please describe

Former N.L. Industries 3241 Walden Avenue Depew, NY

Page 5 of 5

Fencing

there signs of damage to the fencing around the retention pond or within the are the environmental easement?	
YES NO If yes, describe location and extent of damage	
Is there signs of frost heaving within the supports of the fencing?	
YES NO If yes, please describe	
Is the chain link still attached to support poles at all locations around the retention	
pond or within the area of the environmental easement?	
YES NO If no, please describe	
Is there any sign of erosion along the banks of the retention pond?	
YES NO If yes, please describe	
Please describe any changes to the overall area since the last inspection	
VEGETATION ALOND SOUTH FENCELINE REMOVES. PATRITUS	
AREAS OF CONCRETE PARS HOLDING.	
THE	

Appendix B Photographs



Photo 1 – Parking lot looking west along north side of office.



Photo 2 – Parking lot looking north.



Photo 3 – Former rail siding looking west.

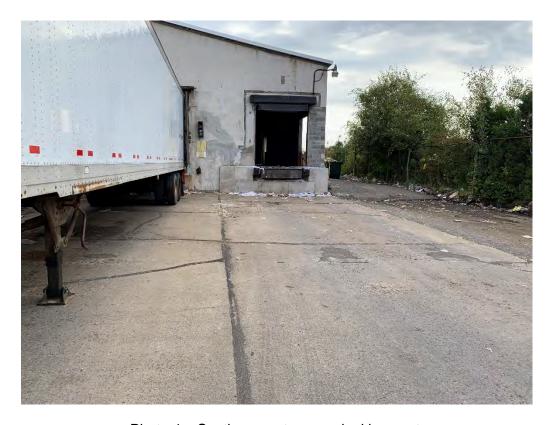


Photo 4 – South concrete apron looking east.



Photo 5 – Building Apron Concrete System (central portion) looking east. Surface cracks are sealed.

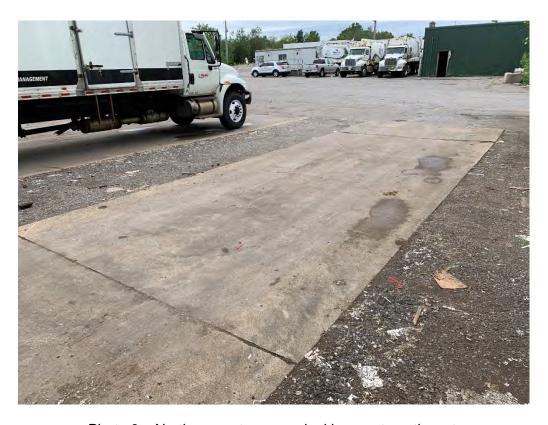


Photo 6 – North concrete aprons looking west-southwest.



Photo 7 – Trucking yard looking southwest.



Photo 8 – Trucking yard looking north.



Photo 9 – GCL and Soil Cover System looking west along south slope.



Photo 10 – GCL and Soil Cover System looking east along south slope.



Photo 11 – GCL and Soil Cover System looking north along west slope.



Photo 12 – GCL and Soil Cover System looking east along north slope.



Photo 13 – Looking northwest toward pond.



Photo 14 – Looking over outlet pipes of pond.



Photo 15 – Looking west across GCL/asphalt cover.



Photo 16 – Looking southeast across slope of GCL/asphalt cover toward trucking yard.



Photo 17 – Looking east across trucking yard entrance.



→ The Power of Commitment