

October 15, 2011

Mr. Gregory B. MacLean
Division of Environmental Remediation
NYS Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, NY 14414-9519

Re: Former Jarl Extrusions Site
Periodic Progress Report
Site No. 828-005
Pittsford, NY
File: 784/29706 #2

Dear Mr. MacLean:

In accordance with the approved Operation, Maintenance, and Ground Water Monitoring (O&M) Plan dated October 2000 for the Former Jarl Extrusion Site, Novelis Corp. is providing the following Periodic Progress Report regarding the asphalt cover inspection activities at the site.

The Periodic Progress Report, photographs and a figure showing the reference locations of the photographs are attached. Also attached is the completed NYSDEC Site Management Periodic Review Report Notice Institutional and Engineering Controls Certification Form. The next asphalt inspection is scheduled for summer, 2013. If you have any questions or comments, please contact me at 315-349-0320.

Very truly yours,

A handwritten signature in blue ink, appearing to read "James Brown".

James Brown
EHS Manager
Novelis Inc.

cc: Jim Fear – Novelis Corp.
Shannon Tyndall-Mundy – Novelis Corp

Periodic Progress Report
Former Jarl Extrusions Site
Site No. 828-005
Pittsford, NY
File: 784/29706 #2

- I. Introduction and Site Overview** – The Jarl facility is a 21 acre site located at 860 Linden Avenue in the Town of Pittsford, Monroe County, New York. The general area around the site consists of commercial and light industrial properties. The site is bordered on the south by Linden Avenue and on the west by a light industrial facility. To the north are a wooded ravine and a tributary of Irondequoit Creek. On the east is the Sigismondi Landfill.

The site is currently classified as Class 4 in the New York State Registry of Inactive Hazardous Waste Sites. The Jarl facility began making aluminum products in 1953. Plant operations ceased in 1988 prior to the facility being acquired by Alcan Aluminum Corporation (now Novelis Corp.). Manufacturing operations were never conducted by Alcan at the facility. In December 1996, Alcan sold the facility to the Associated Tool & Die Company. The company has since been sold to North Side Salvage.

NYSDEC and Alcan entered into an Order on Consent (CO) agreement (Index #B8-0049084-10) in October 1990. In 1990, Alcan initiated a Focused Remedial Investigation (RI) to determine the extent of impact to soil and groundwater. The RI indicated the presence of metals and VOCs at the site. Following the RI activities, the various alternatives were evaluated in a Feasibility Study (FS) report submitted to the NYSDEC and approved in August 1997. The NYSDEC issued a Record of Decision in March 1998 with the selected remedy to install an asphalt cover over former impoundment areas at the site.

A second CO agreement (Index# B8-0049-97-07), signed by Alcan and NYSDEC in February 2000, addressed remedial activities and revised elements of the proposed remedy contained in the ROD. Design documents for the asphalt cover were approved by the NYSDEC in February 2000. Construction of the asphalt cover was initiated on April 17, 2000 and was completed on May 22, 2000. Ongoing site requirements are defined by the Operation, Maintenance, and Groundwater Monitoring Plan (dated October 2000 as prepared by O'Brien & Gere Engineers). A five year groundwater monitoring plan took place from 2000 through 2005.

- II. Operation & Maintenance (O&M) Plan Compliance Report** – To maintain the integrity of the asphalt cover, the O&M plan required on-site inspections of the asphalt cover be conducted twice the first year starting in 2001, annually for the next four events and biannually (every 2 years) thereafter for a total inspection period of 30 years. The O&M plan required drainage patterns and erosion controls also be inspected and maintained as part of the monitoring program.

On July 19, 2011, the asphalt cover was inspected by James Brown of Novelis (with property owner – John Sebastian in attendance). The asphalt cover was in good condition and there

were no signs of erosion around the edges of the cover. Asphalt was disturbed in two approximately 8ft by 8 ft areas which had been backfilled with crushed stone (refer to photos #2 and #3). In addition, several minor joint cracks in the pavement seal were noted (refer to photo #8). Drainage appeared normal with no signs of erosion. There were several piles of yard type waste deposited on the sides of the asphalt cover (refer to photos #s 6 and 7).

No evidence of vehicles being parked or stored on the asphalt cover was noted. Photos documenting site conditions and a site diagram can be found in the attached photo log. Repairs of this area have been scheduled to be completed during October 2011.

- III. Conclusions and Recommendations** – The asphalt cap appears to be performing as intended. Repairs to the cover will be completed as described in Section II above. Recommendation is to continue inspections on a biannual basis.



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. 828005

Site Name Former Järl Extrusions, Inc. (ALCAN)

Site Address: 860 Linden Avenue Zip Code: 14445

City/Town: Pittsford

County: Monroe

Site Acreage: 20.0

Reporting Period: January 13, 2010 to September 15, 2011

- | | YES | NO |
|---|-------------------------------------|-------------------------------------|
| 1. Is the information above correct? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| If NO, include handwritten above or on a separate sheet. | | |
| 2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form. | | |
| 5. Is the site currently undergoing development? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Box 2

- | | YES | NO |
|--|-------------------------------------|--------------------------|
| 6. Is the current site use consistent with the use(s) listed below?
Commercial and Industrial | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Are all ICs/ECs in place and functioning as designed? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM.

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

10/15/2011

SITE NO. 828005

Box 3

Description of Institutional Controls

Parcel

Owner

Institutional Control

138.160-01-001

NOVELIS CORP

Landuse Restriction
O&M Plan

Box 4

Description of Engineering Controls

Parcel

Engineering Control

138.160-01-001

Cover System

Control Description for Site No. 828005

Parcel: 138.160-01-001

Deed restrictions have been put in place to prevent future uses of the site which are incompatible with the selected remedy.

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 certification;

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

YES NO



2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

(a) the Institutional Control and/or 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

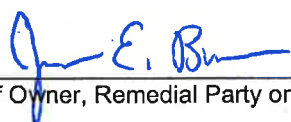
(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO



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

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



Signature of Owner, Remedial Party or Designated Representative

10/15/2011

Date

IC CERTIFICATIONS
SITE NO. 828005

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 2 and/or 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 James Brown at 448 County Route 1A, Oswego, NY 13126
print name print business address
am certifying as Novelis Inc. (Owner or Remedial Party)

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

James E. Brown 10/15/2011
Signature of Owner or Remedial Party Rendering Certification Date

IC/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 James Brown at 448 County Route 1A, Oswego, NY 13126
print name print business address
am certifying as a Qualified Environmental Professional for the Novelis Inc.
(Owner or Remedial Party)

James E. Brown #073485 10/15/2011
Signature of Qualified Environmental Professional, for Stamp Date
the Owner or Remedial Party, Rendering Certification (Required for PE)

Brighter ideas with aluminum



Novelis Inc Former Jarl Extrusion Site

Asphalt Cover Inspection Photo Log

July 19, 2011



Jarl Site Photos – July 19, 2011



Photo 1 - West side of property looking North.



Photo 2 – West Side of property looking South

Jarl Site Photos – July 19, 2011



Photo 2 – Repair required along Northern edge of property (approx 8ft by 8ft).



Photo 3 - Repair required on North-West side of property (approx. 8ft by 8ft).

Jarl Site Photos – July 19, 2011



Photo 5 – Owner fill along Northwest edge of property.



Photo 6 – Owner fill in Northwest corner of property.

Jarl Site Photos – July 19, 2011



Photo 7- Looking West to East along property



*Joint
cracking –
various
locations*

Photo 8 – Looking West to East
along property

Jarl Site Photos – July 19, 2011

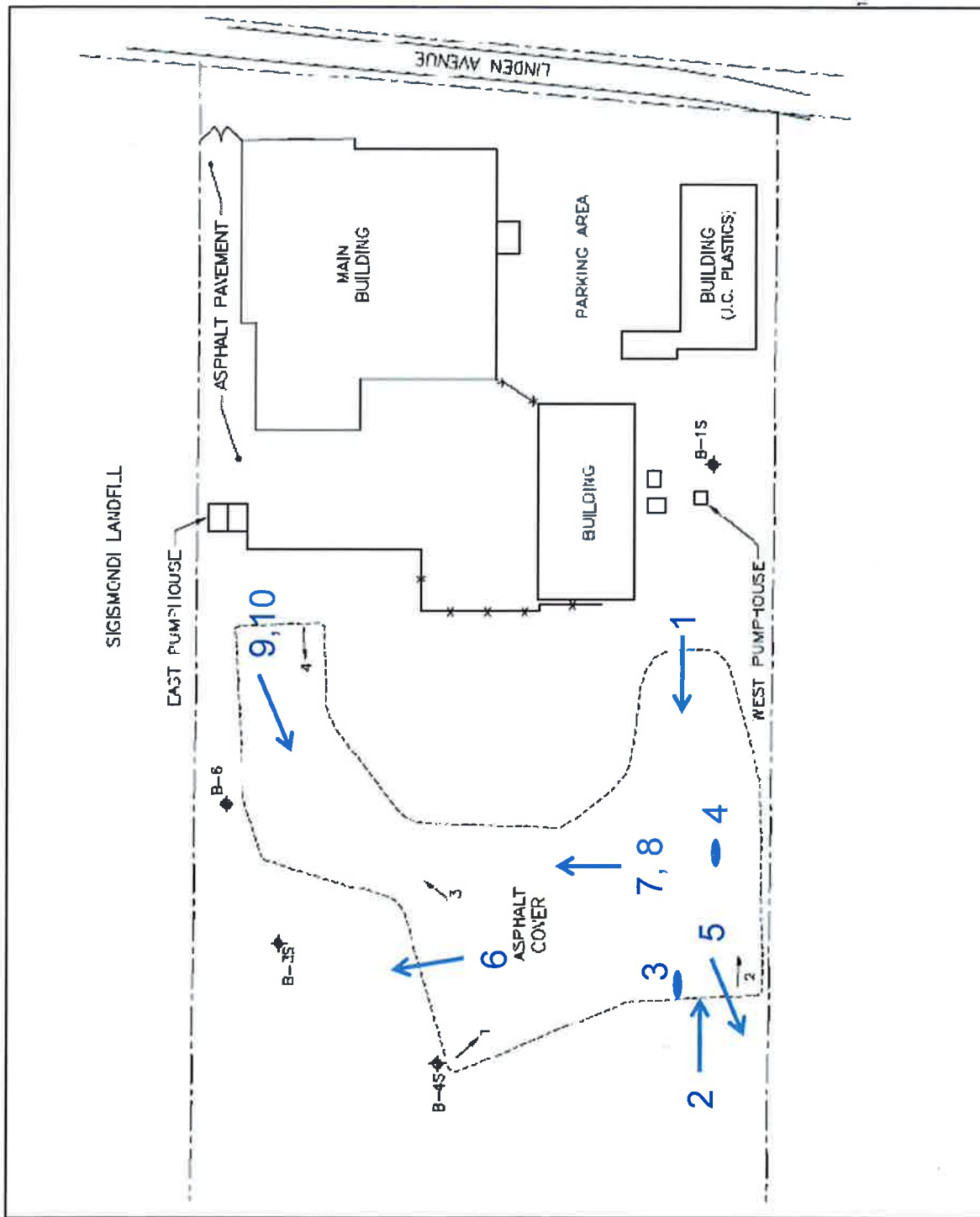


Photo 9- East side of property
looking North



Photo 10 – East side of property
looking Northwest

FIGURE A



Novelis Inc Former Jarl Extrusion Site

Asphalt Cover Inspection Photo Log - Repairs

December 16, 2011 (Revised January 8, 2012)



Jarl Site Photos - Repairs – November 11, 2011



Repair Patch



Repair Patches

Jarl Site Photos - Repairs – November 11, 2011



Crack filling repairs



Crack filling repairs

Jarl Site Photos - Repairs – November 11, 2011



Patch repair – settlement occurred under patch repair – Settlement repaired again in Dec 2011 – see photo to right.



Patch repair – Filled with gravel and cold patch asphalt during week of December 9, 2011.