

October 12, 2016

Charlotte Theobald
Project Manager
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 Charlotte Theobald:

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, 2018. If you have any questions or comments, please contact me at 315-657-0586.

Very truly yours,

James Brown

Environmental Manager

Novelis Inc.

cc: John Tillman – Novelis Corp.

Steven Royer - Novelis Corp

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> 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 must be inspected and maintained as part of the monitoring program.

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On September 1, 2016, the asphalt cover was inspected by James Brown of Novelis (with the property owner – John Sebastian in attendance). The asphalt cover was generally in good condition with only minor settlement observed in a few areas (see photos). Drainage appeared normal with no signs of erosion around the edges of the cover. There were some piles of general yard and road construction type material deposited in a few locations on the sides of the asphalt cover (refer to photos), mostly situated on the ground areas off of the cover, which the property owner is using to fill in low areas of the property. There were also some vehicles, trailers and a dumpster that have been located on the asphalt cover, but it did not appear that the integrity of the asphalt cover has been compromised at those locations. Novelis is in discussion with the property owner to address the areas of minor settlement and to have those locations re-patched and re-leveled.

III. Conclusions and Recommendations – The asphalt cap appears to be performing as intended. Recommendation is to continue inspections on a biannual basis.



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



S	ite No.	Site Details	Box 1					
Site Name Former Jarl Extrusions, Inc. (ALCAN)								
Site Address: 860 Linden Avenue Zip Code: 14445 City/Town: Pittsford County: Monroe Site Acreage: 20.0								
Re	eporting P	Period: September 15, 2013 to September 15, 2016						
			YES	NO				
1.	Is the in	nformation above correct?	×					
	If NO, ir	nclude handwritten above or on a separate sheet.						
2.	Has son tax map	me or all of the site property been sold, subdivided, merged, or undergone a amendment during this Reporting Period?		×				
3.		re been any change of use at the site during this Reporting Period IYCRR 375-1.11(d))?		×				
4.	Have ar for or at	ny federal, state, and/or local permits (e.g., building, discharge) been issued the property during this Reporting Period?		×				
	If you a	nswered YES to questions 2 thru 4, include documentation or evidence cumentation has been previously submitted with this certification form.						
5.	Is the sit	te currently undergoing development?		×				
			Box 2					
			YES	NO				
6.		rrent site use consistent with the use(s) listed below?	×					
7.	Are all IC	Cs/ECs 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.								
-	orrective	Measures Work Plan must be submitted along with this form to address these	issues.					
6,100	natura of f	Owner, Remedial Party or Designated Representative Date						

SITE NO. 828005

138.160-01-001

Box 3

Description of Institutional Controls

Parcel

Owner

Novelis Corp

Institutional Control

Landuse Restriction

O&M Plan

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

Box 4

Description of Engineering Controls

Parcel

Engineering Control

138.160-01-001

Cover System

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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; 					
	8	 b) to the best of my knowledge and belief, the work and conclusions described if are in accordance with the requirements of the site remedial program, and gene engineering practices; and the information presented is accurate and compete. 	n this certification rally accepted				
		significantly produced, and the information productive is accurate and compete.	YES	NO			
			X				
2.	or Er	re has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional neering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the g statements are true:					
		(a) the Institutional Control and/or Engineering Control(s) employed at this site is the date that the Control was put in-place, or was last approved by the Department	s unchai ent;	nged since			
		(b) nothing has occurred that would impair the ability of such Control, to protect the environment;	public h	ealth 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 S Management Plan for this Control; and				te			
		r the site					
			YES	NO			
			X				
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.							
S	Signatu	re of Owner, Remedial Party or Designated Representative Date	The second second				

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IC CERTIFICATIONS SITE NO. 828005

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.

1 James Brown at 448 County Route 2 print name print business address	1A, Oswego, NY 13126				
am certifying asNovelus	(Owner or Remedial Party)				
for the Site named in the Site Details Section of this form.					
E Brutille Bill 18	10/12/16				
Signature of Owner, Remedial Party, or Designated Representative 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.

1 James 13 rown at 448 County Route IA, Oswego, NV 13126
print name print business address

am certifying as a Qualified Environmental Professional for the

(Owner or Remedial Party)

Vo. 073485

(Required for PE)

10/12/16

Date

Signature of Qualified Environmental Professional, for the Owner or Remedial Party, Rendering Certification September 1, 2016



Novelis IncFormer Jarl Extrusion Site

Asphalt Cover Inspection Photo Log

Novells



Photo 1- West side of property looking North (see inside dumpster below)

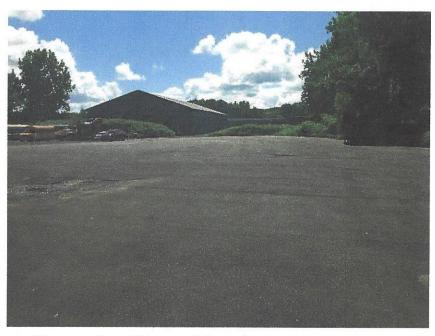


Photo 2 – West side of property looking South



©2015 Novelis Inc.



Photo 3 – Owner fill along Northwest edge of property (note settlement areas of asphalt)

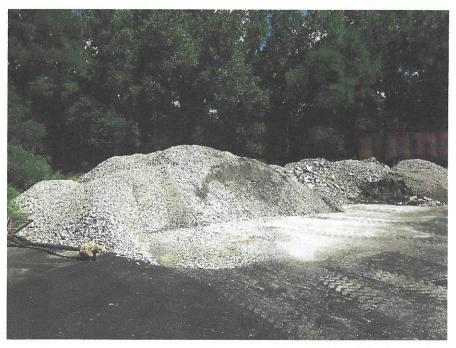


Photo 4 – Owner fill in North-Center edge of property (road spoils from a bridge project)



Photo 5 - Looking West to East along property (also below photo closer to east edge).



Photo 6 – Looking East to West along property.



Photo 7 - East side of property looking Southeast (additional photo of ceramic piles near cap)

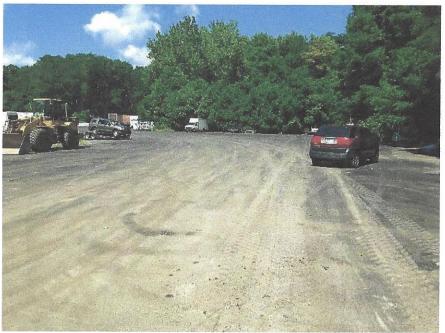


Photo 8 – East side of property looking North

