

October 30, 2020

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 2020 Periodic Progress Report Site No. 828-005 Pittsford, NY

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 Corporation is providing the following Periodic Progress Report (PPR) regarding the asphalt cover inspection activities at the site.

The PPR, photographs, and a figure showing the reference locations of the photographs are attached. Also attached is the completed NYSDEC Site Management PPR Notice Institutional and Engineering Controls Certification Form. The next asphalt inspection is scheduled for fall of 2022. If you have any questions or comments, please contact me at 315-349-0304.

Very truly yours,

David M. Neuner, PE, CHMM

Environmental Leader

cc: John Tillman – Novelis

Steven Royer – Novelis James Brown – Novelis Charlotte Theobald October 30, 2020 Page 2

> 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. Located to the north of the site is a wooded ravine and a tributary of Irondequoit Creek. Located to the east of the site 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 Corporation). 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 of 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 of 1997. The NYSDEC issued a Record of Decision in March of 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 October 23, 2020, the asphalt cover was inspected by David Neuner, P.E., CHMM, Environmental Leader of Novelis with the current property owner (John Sebastian) in attendance. The asphalt cover was inspected and found to be in good condition. Surficial cracks and a few shallow ruts were observed on the surface of the cap (See photographs). A few areas of settlement were observed on the surface of the asphalt cap.

III. Conclusions and Recommendations – The asphalt cap appears to be performing as intended. Recommendations are to repair surficial cracks and areas of settling and 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



Si	ite No.	828005	Site Details	Box 1	ſ			
Si	ite Name	Former Jarl Extrusions	, Inc. (ALCAN)					
Ci Cc	Site Address: 860 Linden Avenue Zip Code: 14445 City/Town: Pittsford County: Monroe Site Acreage: 20.0							
R	Reporting Period: September 15, 2018 to September 15, 2020							
				YES	NO			
1.	is the in	formation above correct?		×				
	if NO, in	clude handwritten above	or on a separate sheet.					
2.	Has son tax map	ne or all of the site propert amendment during this R	y been sold, subdivided, merged, or undergo eporting Period?	one a	M			
3.	(see 6N	YCRR 375-1.11(d))?	e at the site during this Reporting Period		Ħ			
4.	for or at t	the property during this Ro			×			
	if you an that doc	nswered YES to question umentation has been pr	ns 2 thru 4, include documentation or evic eviously submitted with this certification	lence form.				
5.	Is the site	e currently undergoing de	velopment?		×			
				Box 2				
				YES	NO			
6.	Is the cur Commerc	rent site use consistent w cial and Industrial	ith the use(s) listed below?	×				
7.	Are all IC	s/ECs in place and function	oning as designed?	M				
	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 C	A Corrective Measures Work Plan must be submitted along with this form to address these issues.							
Sign	ature of O	wner, Remedial Party or De	esignated Representative Do	ate				

SITE NO. 828005

Box 3

Description of Institutional Controls

<u>Parcel</u>

<u>Owner</u>

138.160-01-001

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.

Description of Engineering Controls

Box 4

<u>Parcel</u>

138.160-01-001

Engineering Control

Cover System

	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; 	ection of	f, and
	 b) to the best of my knowledge and belief, the work and conclusions described are in accordance with the requirements of the site remedial program, and gene engineering practices; and the information presented is accurate and compete. 	erally accepted	
	on a securate and compete.	YES	NO
		×	
2.	If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below the following statements are true:	each li tall of t	nstitutional the
	 (a) the Institutional Control and/or Engineering Control(s) employed at this site if the date that the Control was put in-place, or was last approved by the Department 	s uncha ent;	inged 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 including access to evaluate the continued maintenance of this Control; 	the ren	nedy,
	(d) nothing has occurred that would constitute a violation or failure to comply wit Management Plan for this Control; and	h the S	ite
	(e) if a financial assurance mechanism is required by the oversight document for mechanism remains valid and sufficient for its intended purpose established in the	r the site	e, the ment.
		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.		
1	A Corrective Measures Work Plan must be submitted along with this form to address th	ese iss	ues.
5	Signature of Owner, Remedial Party or Designated Representative Date		

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.

print name at 448 (print business address					
am certifying as Novells Corporation	(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						

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.

print name at 448 Co. Etc. 1A OSWEGO, NY 13126
print business address

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

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

SIIƏAON

Asphalt Cover Inspection Photo Log

SITE NO. 828-005

FORMER JARL EXTRUSIONS SITE

NOVELIS

David Neuner, PE

Environmental Leader

Oswego Works



Novelis



Photo 1: Secured gate to prevent access to asphalt cover



Photo 2: Surficial cracking, pooling of water on asphalt cover



Photo 3: Surficial cracking throughout asphalt cap



Photo 4: Equipment stored on and off of asphalt cover. Location of previous cap repair (box on ground in front of box truck).





Photo 5: Evidence of parking heavy load on asphalt cap

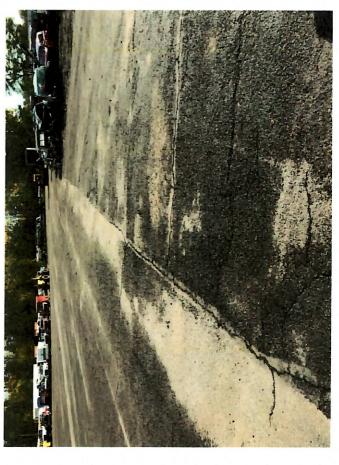


Photo 6: Surficial cracking observed along paving pass lines

Novelis



Photo 7: Close up of surficial cracking



Photo 8: Cracking and spalling of surface. Deep settling observed in two areas.

Novelis



Photo 9: Southeast corner of cap in good condition



Photo 10: Some surficial cracking observed along pass lines

