

# **Period Review Report**

Former Days Inn Site NYSDEC No. 851054 23 Riverside Drive Corning, New York

December 11, 2024

Prepared for:

Fitzpatrick Holdings, Inc. 37 Pyrex Street Corning, New York 14830

Prepared by:

Roux Environmental Engineering and Geology, D.P.C. 2558 Hamburg Turnpike, Suite 300 Buffalo, New York 4218

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#### 1. Introduction

Roux Environmental Engineering and Geology, D.P.C has prepared this Periodic Review Report (PRR), on behalf of Fitzpatrick Holdings, Inc. (FHI) to summarize the post-remedial status of the Former Days Inn Site and City-Owned Parking Lot subject to the Site Management Plan (SMP; Ref. 1).

The Former Days Inn Site is located at 23 Riverside Drive, Steuben County, Corning, New York (Site) and is owned by FHI. The City-Owned Parking Lot is located at (unaddressed) Riverside Drive across the street, south of 23 Riverside Drive. It is used as the parking lot for the hotel and is owned by the City of Corning. See Figures 1 and 2. The Site was formerly a Days Inn hotel, which was demolished in June 2014, and is now a Hiton Garden Inn which was newly constructed and opened in 2018. The City-Owned Parking Lot was improved with storm sewer infrastructure and new light poles in June 2018, to coincide with the opening of the Hilton Garden Inn.

This PRR has been prepared for the Site & City-Owned Parking Lot in accordance with NYSDEC DER-10/*Technical Guidance for Site Investigation and Remediation* (Ref. 2). This PRR and the associated IC/EC Form (see Appendix A) have been completed for the post-remedial period from November 30, 2023 through November 30, 2024. Site photographs from the site inspection are included as Appendix B.

#### 1.1 Site Background

During redevelopment activities in 2014, contaminated fill consisting of refractory brick, black ash, and glass cullet was removed from the Site during construction activities along with other soil/fill materials. As many as 220 truckloads of mixed volume were removed from the Site and taken to eight (8) other locations in Steuben County for use as fill material. The New York State Department of Environmental Conservation (NYSDEC) expressed concern regarding the fill material that was present at the Site, and that material which has been removed. Construction activities were halted at the Site until the matter was resolved. At the time the project was halted, the foundations work for the new hotel was underway.

FHI, the Site owner; High Construction Company (HCC), the Site construction contractor for the hotel project; and Doug Gross Construction, Inc. (DGC), HCC's subcontractor for excavation activities associated with the hotel project; entered into an Order on Consent with NYSDEC on September 10, 2015. Although the Site was subject to a Superfund Program Order on Consent, it was given a "P" classification. Class P sites are not listed on the Registry of Inactive Hazardous Waste Disposal Sites (Registry) and many are eventually found to not qualify for Registry listing. NYSDEC uses the P classification for sites where preliminary information indicates that a site may have contamination that makes it eligible for consideration for placement on the Registry.

Site characterization (SC) and SC Report (Ref. 3) were completed from September 2015 through January 2016 to supplement previous environmental data collected by NYSDEC; collect additional soil/fill samples to further characterize fill and native soil present at the Site and City-owned parking lot; and delineate the extent of contaminated soil/fill containing ash, slag, and glass cullet at the Site and City-owned parking lot. The SC Report proposed to implement an Interim Remedial Measure (IRM) involving installation of a cover system across at the Site, establishing an Environmental Easement (EE) and preparation and implementation of a Site Management Plan (SMP) SMP to address soil/fill glass waste and/or contamination

if it is encountered during redevelopment and/or future activities to be conducted. The SC Report was approved by NYSDEC in a letter dated January 8, 2016. The IRM Work Plan (Ref. 4) for the Site was approved by NYSDEC in a letter dated September 16, 2016 and the Off-Site IRM Work Plan (Ref. 5) for the eight (8) off-site properties was approved by NYSDEC in a letter dated September 19, 2016.

The IRM activities at the eight (8) off-site properties receiving fill material containing ash, brick and glass from the Site were completed in October 2016. The eight (8) individual Construction Completion Reports for those individual Sites were approved by NYSDEC in a letter dated March 31, 2017.

The IRM activities at the Site occurred in February 2017. The on-site IRM activities were documented in an on-site CCR (Ref. 6) which was approved by NYSDEC in a letter dated April 6, 2017. The Order on Consent for the Site was then terminated by NYSDEC in a letter dated April 21, 2017.

The Site and City-Owned Parking Lot are both considered commercial uses, a hotel and parking lot, respectively. Therefore, the Site was remediated consistent with a 6NYCRR Part 375 Track 4 Commercial Use in which a cover system, Environmental Easement and Site Management Plan were employed to control exposure to remaining contamination to ensure protection of public health and the environment.

Construction activities at the Site associated with redevelopment for the Hilton Garden Inn and improvements to the City-Owned parking lot were completed between September 2017 and July 2018. A summary of these activities are discussed in Section 2.1 of this CM&PRR.

Figure 2 is an aerial view of the Site following redevelopment and improvements to the City-Owned Parking Lot.

The properties adjoining and surrounding the Site are primarily commercial properties to the north, east and west. The City-Owned Parking Lot and a NYS-owned municipal garage are located to the south.

#### 1.2 Purpose/Scope

The SMP requires, among other things, periodic inspection, and certification that the institutional and engineering controls implemented at the Site remain in place and are functioning as designed. The existing SMP requires that a site-wide inspection be completed at a minimum of once per year to verify that the institutional and engineering controls established for the Site remain in place and are operating as intended and be documented in a Periodic Review Report (PRR).

#### 2. Site Overview

The redevelopment of the Site and City-owned parking lot were completed in accordance with the NYSDEC-approved SMP which identifies requirements for monitoring and maintenance of engineering and institutional controls; and procedures for excavation and related activities that may disturb the cover systems.

The Site and City-owned parking redevelopment activities associated with SMP-related activities occurred between September 5, 2017 and July 11, 2018. No additional redevelopment or subsurface disturbance activities occurred after July 2018. The redevelopment activities that did occur between September 2017 and July 2018 are discussed below in Section 2.1.

The area surrounding the Site has not significantly changed since the SMP was issued.

#### 2.1 Site Redevelopment Activities

Redevelopment activities, that required SMP-implementation, occurred between September 2017 and July 2018. During these activities, environmental oversight was provided, and the Community Air Monitoring Plan (CAMP) was implemented. Oversight and CAMP were also provided during intrusive work conducted in Riverside Drive and at the City-Owned Parking Lot.

The contaminated soil/fill encountered during subsurface activities containing ash, slag, brick, and glass cullet that was generated from the Site (southeastern portion of the Site formerly under the 1-foot cover), in the City-owned parking lot, and under Riverside Drive were sent to the Stueben County Bath Landfill for disposal. Approximately 1,865 tons of material were taken to the landfill for disposal as part of the redevelopment activities. The landfill approvals and disposal documentation are provided in Appendix E. [Prior to the restart of redevelopment activities, a dumpster containing vegetation and soil from grubbing activities was present on the north side of the Site in April 2017. It was characterized and landfill disposed.

Excess soil and previously placed stone generated from the Site outside of the impacted areas identified during the SC (approximately 700 cubic yards) and soil used to construct the 1 ft soil cover in the southeastern portion of the Site (approximately 200 cubic yards) that could not be reused on-site were taken to Gridley Excavation LLC located at 41 River Soad, Corning NY or Country Side Energy Services LLC, located at 8498 Route 415 in Cambell, New York, for use as fill under NYSDEC-approved Beneficial Use Determination (BUD) approvals. These materials were observed during excavation to verify they did not contain ash, slag, brick, and glass cullet before being transported off-site under the BUD approval.

Materials imported to the Site as part of the redevelopment activities included: Round #3 Stone, Crushed #3 Stone, Crusher Run Stone, Crushed #1& 2 Stone, #1A Stone, Sand and Topsoil with NYSDEC-approvals. An orange demarcation layer was installed during subsurface redevelopment activities.

A summary of the major subsurface redevelopment activities included the following, in chronological order:

September & October 2017: On-site utility excavation work for the installation of storm sewers, sanitary sewers, electrical, gas and water lines.

# 2024 Periodic Review Report Former Days Inn Site

November & December 2017: Collect waste characterization samples (see Appendix F) from beneath the 1-foot cover system in the southeastern portion of the Site to characterize soil/fill and establish a landfill profile for materials to be removed containing the ash, slag, brick, and glass cullet for patio foundation and utility installations in this area. Remove cover system and excavate to required depths to install patio foundation and utilities.

March & April 2018: Excavations along Riverside Drive and around building for dumpsters pad and sidewalks.

April 2018: Excavations for catch basins, utility tie-ins, and curbing along Riverside Drive.

June 2018: City-Owned Parking Lot stormwater and lighting infrastructure; and resurface parking lot.

July 11, 2018: Installation of Hilton Garden Inn sign at southeast corner of the Site. Last day of redevelopment activities.

In 2019, the mulch that was initially installed with planting in the parking lot islands on the north side of the Site was replaced with riverstone. The mulch in these areas was present over a black landscaping weed control fabric. The mulch was not a part of the cover system, but a decorative material.

The redevelopment activities discussed in herein Section 2.1 and associated documentation can be found in the January 16, 2024 Corrective Measures and Periodic Review Report (Ref. 7)

#### 3. Site Management Plan

The SMP (Revision 1) was approved by the Department on March 12, 2024. The SMP includes an IC/EC Plan, a Monitoring and Sampling Plan, an Operation & Maintenance (O&M) Plan, an Excavation Work Plan (EWP), and a copy of the Environmental Easement. A brief description of the components of the SMP is presented below.

#### 3.1 IC/EC Plan

Since remaining contaminated soil/fill exists beneath the Site, Institutional Controls and Engineering Controls (IC/ECs) are required to protect human health and the environment. The Engineering and Institutional Control Plan describes the procedures for the implementation and management of all IC/ECs at the Site. At the time of the site inspection, the Site is compliant with all engineering and institutional control requirements as shown in Figure 3 – Existing Cover System.

#### 3.1.1 Institutional Controls

The Site has a series of Institutional Controls in the form of site restrictions. Adherence to these Institutional Controls are required by the Environmental Easement. Site restrictions that apply to the Site are:

- The property may be used for commercial and/or industrial use;
- All ECs must be operated and maintained as specified in this 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 NYSDOH or the Steuben 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.
- Groundwater and other environmental or public health monitoring must be performed as defined in the SMP;
- Data and information pertinent to site management must be reported at the frequency and in a manner as defined in this SMP;
- All future activities that will disturb remaining contaminated material must be conducted in accordance with this SMP;
- Monitoring to assess the performance and effectiveness of the remedy must be preformed as defined in the SMP;
- Operation, maintenance, monitoring, inspection, and reporting of any physical component of the remedy shall be performed as defined in this SMP; and
- 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 Environmental Easement.

#### **3.1.2 Engineering Controls**

Engineering controls at the Site include:

Cover System – Exposure to remaining contamination in soil/fill at the Site is prevented by a final
cover system placed over the site. This cover system is comprised of a minimum of 12-inches of
clean soil (with underlying demarcation layer), asphalt pavement, concrete-covered sidewalks, and
concrete building slabs, was placed over the Site. The cover system must be maintained in
compliance with the SMP.

#### 3.1.3 Site Inspection & IC/EC Compliance

On November 23, 2024, Roux's Qualified Environmental Professional (QEP) per 6NYCRR Part 375.12. Christopher Boron, P.G., performed a Site visit and assessment.

At the time of the Site visit and assessment, the existing cover systems (see Figure 3) are performing as intended and found to be compliant with the IC/EC requirements. No observable indication of intrusive activities, cover failure, or use of groundwater were noted.

It should be noted that the mulch formerly present in the landscape beds around the building was replaced with riverstone in August 2024, similar to the north parking lots islands in 2019. According to Ms. Pamela Ray, HGI General Manager, Kizis Landscaping removed remaining the mulch to the top of the underlying black landscaping weed control fabric and replaced with riverstone. The black landscaping weed control fabric was confirmed to be present in beds on the north and south of the Site building. See Photography 4 and 10, in Appendix B. The riverstone is not a component of the cover system. The 1-foot of NYSDEC-acceptable soil imported to the Site under lying the black fabric is the cover system underlain by orange demarcation.

Appendix A includes the completed and QEP-certified IC/EC Form for the Site. Appendix B includes the Site Photographic Log.

#### 3.2 Monitoring and Sampling Plan

The remedy for the Site does not rely on any mechanical systems such as sub-slab depressurization or soil vapor extraction, nor are there any long-term monitoring or sampling requirements, to protect public health and the environment.

#### 4. Conclusions and Recommendations

#### **Conclusions**

- No redevelopment activities have occurred in the past reporting period.
- At the time of the Site inspection, the Site complied with the SMP. Specifically, the Site is fully
  compliant with the Institutional Controls including land-use restrictions, groundwater-use
  restrictions, and the soil/fill management plan component; and fully compliant with the Engineering
  Controls (Site cover system).
- If redevelopment activities involving cover system modification or import/export of soil or stone materials occur in the next reporting period they will be subject to the SMP.

#### Recommendations

- No modifications are recommended at this time.
- The next annual inspection and reporting should occur in fall 2025.

#### 5. Declaration/Limitation

Roux Environmental Engineering and Geology, D.P.C. personnel conducted the annual site inspection for NYSDEC Site No. 851054, located in Corning, New York, according to generally accepted practices. This report complied with the scope of work provided to FHI by Roux Environmental Engineering and Geology, D.P.C.

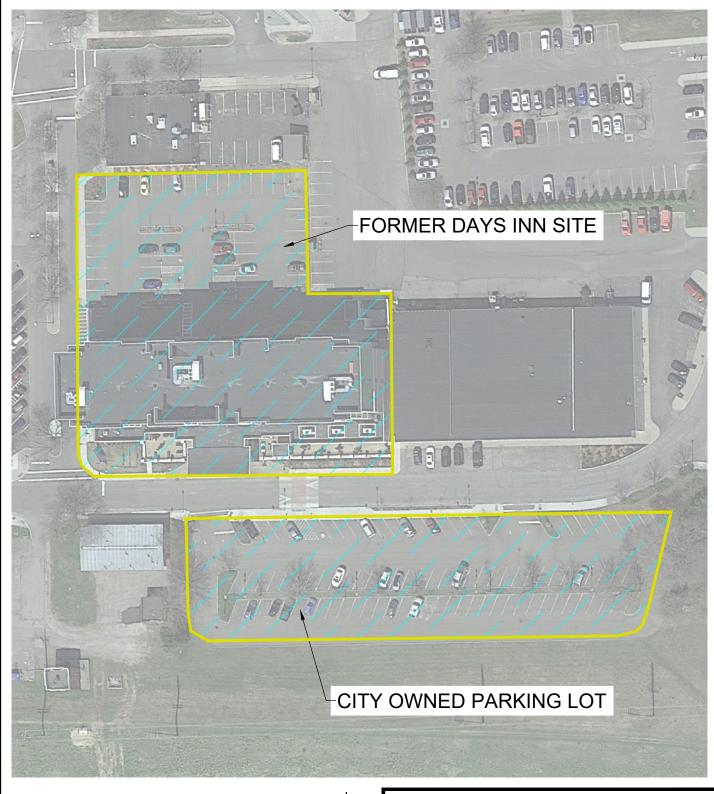
This report has been prepared for the exclusive use of FHI. The contents of this report are limited to information available at the time of the site inspection. The findings herein may be relied upon only at the discretion of FHI. Use of or reliance upon this report or its findings by any other person or entity is prohibited without written permission of Roux Environmental Engineering and Geology, D.P.C.

#### References

- 1. Roux Environmental Engineering & Geology, DPC. Site Management Plan. Former Days Inn Site, NYSDEC Site Number: 851054, 23 Riverside Drive, Corning, New York. Revision 1 March 2024.
- 2. New York State Department of Environmental Conservation. *DER-10/Technical Guidance for Site Investigation and Remediation*. May 2010.
- 3. TurnKey Environmental Restoration, LLC. Site Characterization Report. 23 Riverside Drive, Former Days Inn Site, Site No. 851054, Corning, New York. January 2016.
- 4. TurnKey Environmental Restoration, LLC, in association with Benchmark Environmental Engineering & Science, PLLC. *Interim Remedial Measures Work Plan, Former Days Inn Site, Site No. 851054, 23 Riverside Drive & City-Owned Parking Lot, Corning, New York.* February 2016, Revised August 2016.
- TurnKey Environmental Restoration, LLC, in association with Benchmark Environmental Engineering & Science, PLLC. Off-Site Interim Remedial Measures Work Plan, Fill Material at Eight Off-Site Properties, Former Days Inn Site, 23 Riverside Drive, Corning, New York, Site No. 851054. September 2015, Revised August 2016.
- 6. TurnKey Environmental Restoration, LLC, in association with Benchmark Environmental Engineering & Science, PLLC. Construction Completion Report, Former Days Inn Site, NYSDEC Site Number: 851054, 23 Riverside Drive, Corning, New York. April 2017.
- 7. Roux environmental Engineering and Geology, D.P.C. Corrective Measures & Periodic Review Report, Former Days Inn Site, NYSDEC No. 851054, 23 Riverside Drive, Corning, New York. January 16, 2024.

# **FIGURES**

File: FIGURE 1; SITE VICINITY PLAN.DWG



#### LEGEND:

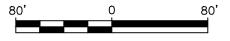


APPROXIMATE PROJECT LIMITS

#### NOTE:

:\CAD\TURNKEY\FITZPATRICK HOLDINGS\PRR\2024\FIGURE 2; SITE AND CITY OWNED PARKING LOT PLAN (AERIAL).DWG

1. IMAGE SOURCE GOOGLE EARTH 2021.



# **X X X**

#### TITLE SITE AND CITY OWNED PARKING LOT PLAN (AERIAL) PERIODIC REVIEW REPORT

23 RIVERSIDE DRIVE (SITE) AND CITY-OWNED PARKING LOT CORNING, NEW YORK

Prepared for:

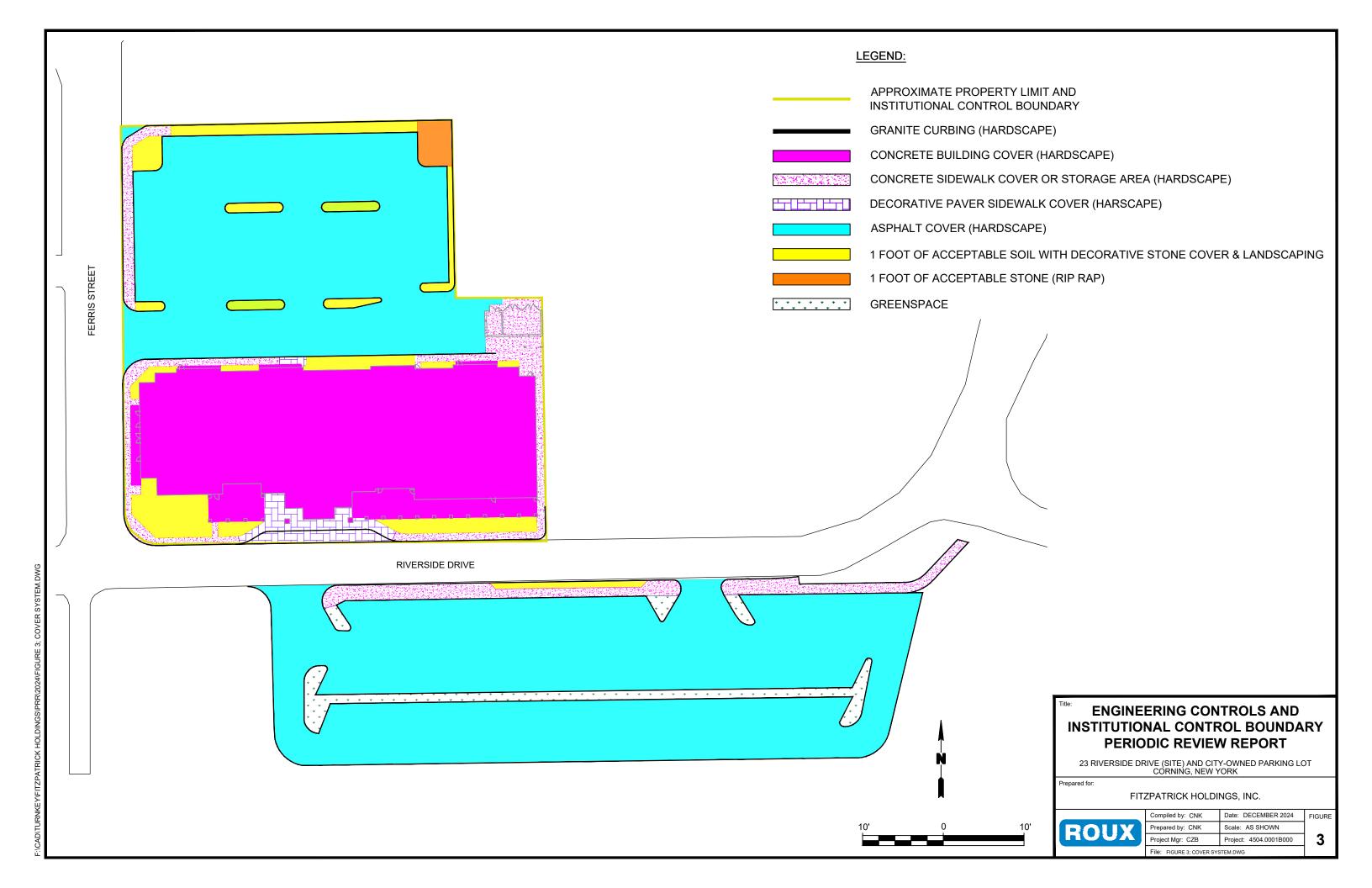
FITZPATRICK HOLDINGS, INC.



| Compiled by: CNK | Date: DECEMBER 2024    |  |  |
|------------------|------------------------|--|--|
| Prepared by: CNK | Scale: AS SHOWN        |  |  |
| Project Mgr: CZB | Project: 4504.0001B000 |  |  |
| Tile:            |                        |  |  |

FIGURE

2



# **APPENDIX A**

**INSTITUTIONAL & 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



| Sit   | Site Details<br>e No. 851054  | Box 1 |    |  |  |
|---|---|-------|----|--|--|
| Sit   | e Name Former Days Inn  |       |    |  |  |
| City<br>Co  | e Address: 23 Riverside Drive Zip Code: 14830<br>y/Town: Corning<br>unty: Steuben<br>e Acreage: 1.350   |       |    |  |  |
| Re  | porting Period: November 30, 2023 to November 30, 2024  |       |    |  |  |
|   |   | YES   | NO |  |  |
| 1.  | Is the information above correct?   | X     |    |  |  |
|   | 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?                          |       | X  |  |  |
| 3.  | Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?   |       | X  |  |  |
| 4.  | Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?                  |       | X  |  |  |
|   | 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?   |       | X  |  |  |
|   |   |       |    |  |  |
|   |   | Box 2 |    |  |  |
|   |   | YES   | NO |  |  |
| 6.  | Is the current site use consistent with the use(s) listed below?  Commercial and Industrial   | X     |    |  |  |
| 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. |   |       |    |  |  |
| Sig   | nature of Owner, Remedial Party or Designated Representative Date   |       |    |  |  |

SITE NO. 851054 Box 3

**Description of Institutional Controls** 

<u>Parcel</u>

Owner

Institutional Control

317.08-01-024.000

Fitzpatrick Holdings, Inc.

Ground Water Use Restriction

Landuse Restriction Site Management Plan

EE filed 2017

SMP

Box 4

**Description of Engineering Controls** 

<u>Parcel</u>

**Engineering Control** 

317.08-01-024.000

Cover System

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;   |  |  |  |
|  | <ul> <li>b) to the best of my knowledge and belief, the work and conclusions described in this certification<br/>are in accordance with the requirements of the site remedial program, and generally accepted<br/>engineering practices; and the information presented is accurate and compete.</li> </ul> |  |  |  |
|  | YES NO   |  |  |  |
|  | <b>X</b>   |  |  |  |
| 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   |  |  |  |
|  | X $\square$  |  |  |  |
|  | 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. 851054

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.

| Keith W S  | Shugerts at  | Hilton Garden Inn - 23 Rive     | erside Drive, Corning, NY 14830 |
|--|--|---------------------------------|---------------------------------|
| print name   |  | print business addre            | ess                             |
| am certifying as   | Authorized Representative  | e for Fitzpatrick Holdings, Inc | · (Owner or Remedial Party)     |
| for the Site named in the Site Details Section of this form. |  |                                 |                                 |
| LA WIST  | when the same of t |                                 | December 11, 2024               |
| •  | r, Remedial Party, or Desi   | gnated Representative           | Date                            |
| Signature of Owner<br>Rendering Certifica                    |  | gnated Representative           |                                 |

#### 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.

| Christopher Boron  | 2558 Hamburg Tu      | rnpike, Suite 300,      | Buffalo, New York  |
|--|----------------------|-------------------------|--------------------|
| print name   | print busin          | ess address             | :                  |
| am certifying as a Qualified Environmental   | Professional for the | Owner - Fitzpatr        | ick Holdings, Inc. |
|  |                      | (Owner or Reme          | dial Party)        |
|  |                      |                         |                    |
|  |                      |                         |                    |
| MA I Som   | ~                    | [                       | December 10, 2024  |
| Signature of Qualified Environmental Profethe Owner or Remedial Party, Rendering C |                      | amp<br>lequired for PE) | Date               |

# **APPENDIX B**

**SITE PHOTOGRAPHIC LOG** 



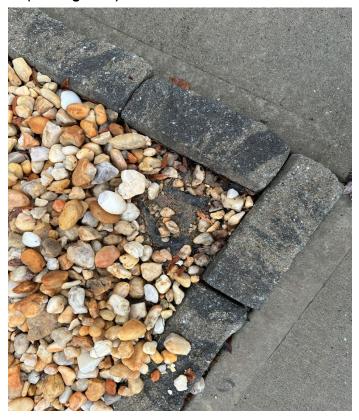
Photograph 1: City-Owned Parking Lot during November 2024 inspection (looking east).



Photograph 2: City-Owned Parking Lot during November 2024 inspection (looking west).



Photograph 3: : Landscaped bed in the southeast corner of the building along Riverside Drive. Mulch replaced with river stone in August 2024. (looking west).

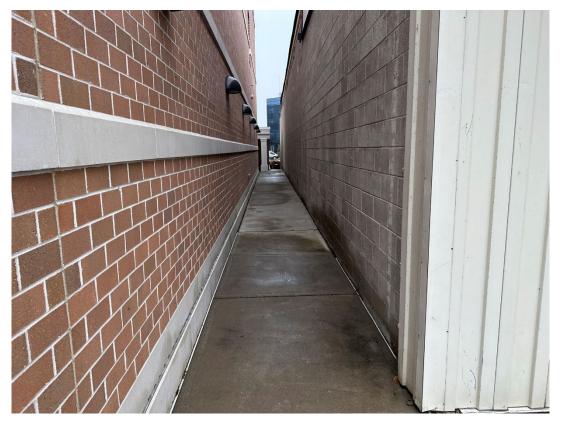


Photograph 4: Black landscape bed fabric beneath river stone in the southeast corner of the building was left in place after removing mulch in August 2024.





Photograph 5: Patio and stamped concrete cover system in the southeast corner of the building along Riverside Drive (looking west).



Photograph 6: Concrete cover system along east side of building (looking north).





Photograph 7: Greenspace on the southwest corner of the Site (looking east).

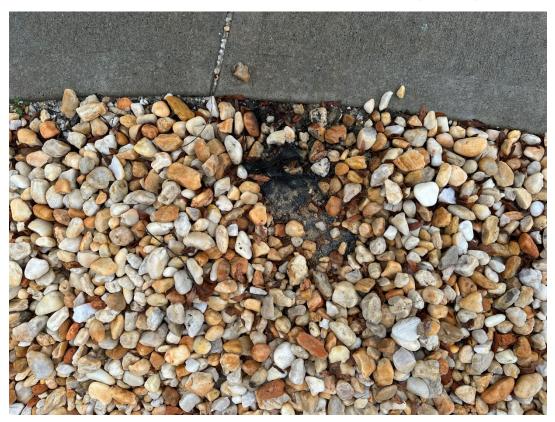


Photograph 8: Parking lot and landscaped islands on the north side of the building (looking east).



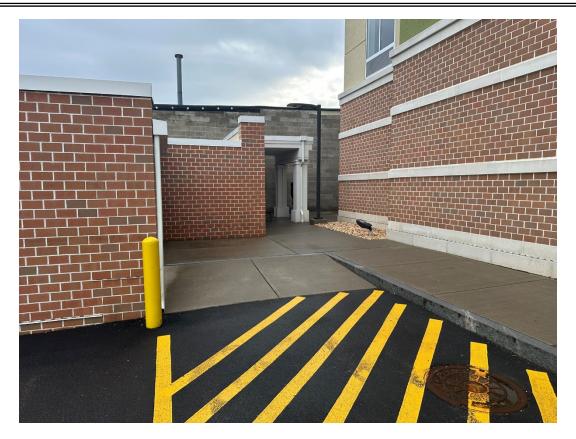


Photograph 9: Landscaped bed (riverstone used to replace mulch in August 2024) on the northwest corner of the building (looking south).



Photograph 10: Black landscape bed fabric beneath riverstone in the northwest corner of the building was left in place after removing mulch in August 2024.





Photograph 11: Concrete sidewalks and back side of exterior storage areas along the northeast corner of the building (looking east).



Photograph 12: Dumpster areas and exterior storage area at the northeast corner of the building (looking south).





Photograph 13: Rip rap cover system in northwest corner of Site (looking east).



Photograph 14: Parking lot and landscaped island on north side of the building (looking east).

