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November 13, 2015

New York State
Department of Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203

Attn: Mr. David Szymanski
Project Manager

Re: Periodic Review Report and IC/EC Certification Submittal
318 Urban Street Site
Buffalo, New York
NYSDEC Site Number: 915151

Dear Mr. Szymanski:

On behalf of General Electric Company (GE), URS Corporation – New York (URS), now a wholly owned subsidiary of AECOM, has enclosed one electronic copy on disc and one hard copy of the Periodic Review Report (PRR) for the 318 Urban Street site (Site Number 915151), along with certification forms signed by the Responsible Party and Professional Engineer with original signatures. Please note that the data provided is based on the observations of URS/AECOM during site visits and property owner interviews on October 31, 2014 and October 30, 2015.

On October 30, 2015, Mr. Sweeney answered our questions regarding site use, near-term plans for the site, and whether there had been any disturbance to the cover materials since we were last on-site in 2014. Mr. Sweeney was agreed to sign the owner portion of the certifications. The remaining certifications requested by New York State Department of Environmental Conservation have been amended to include only the statements to which AECOM can certify as the Designated Representative for the Responsible Party.

If you have any questions, please call us or Mr. Tom Antonoff of GE at 518-862-2720.

Sincerely,
URS CORPORATION – NEW YORK

Karen Peppin
Project Manager

Enclosure

cc: Mr. Tom Antonoff – GE
Mr. Sweeney – Pyramid Steel Corporation
Mr. Don Porterfield – AECOM

318 Urban Street Site

ERIE COUNTY, NEW YORK

Periodic Review Report

For

November 2013 through October 2015

NYSDEC Site Number: 9-15-151

Prepared for:

General Electric Company
319 Great Oaks Boulevard
Albany, New York 12203

Prepared by:

URS Corporation – New York
40 British American Boulevard
Latham, New York 12110
(518) 951-2200

NOVEMBER 2015

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1.0 EXECUTIVE SUMMARY

The New York State Department of Environmental Conservation (NYSDEC) became involved in the 318 Urban Street site (NYSDEC site # 915151) after an environmental site assessment performed in conjunction with a planned property transfer identified that the site was impacted by polychlorinated biphenyls (PCBs). A previous owner, the General Electric Company (GE), had operated the site from 1921 to 1968 and GE's activities included the service of electrical equipment with PCB-containing dielectric fluid.

Between 1990 and 1993, investigations found PCBs on the building and equipment surfaces, in the on-site soil, and in the on-site sewers. Additionally, off-site soils and the public sewer system were found to contain PCBs. GE entered into an Order on Consent (Index # B9-0388-91-09) with the NYSDEC in September 1996. The NYSDEC required remediation of on- and off-site sewers, decontamination of the building, and excavation and off-site disposal of PCB-containing soil. In accordance with the Order on Consent, GE implemented remedial actions at the site during the period of 1997 through 1999.

Engineering Controls (ECs) and Institutional Controls (ICs) were established to address the residual impacts that remained at the site following completion of the remedial work. The residually impacted material contain concentrations of contaminants greater than the unrestricted use criteria but less than industrial use criteria, with the exception of small area where further remedial actions could not be undertaken without undermining the building foundation.

The ECs and ICs established at the site include:

- Cover systems;
- Access controls
- Environmental Notice; and
- Site Management Plan.

A Site Management Plan (SMP) was prepared to manage the residual impacts at the site following implementation of the remedial actions and requires than site inspections to assess the ECs be performed at least annually. This Periodic Review Report (PRR) is required by the SMP to document the assessment of site conditions and certify the ECs ICs required by the remedy for the site are in place and operating as designed, or identify corrective actions needed.

On behalf of GE, URS Corporation – New York (URS), which is now a wholly owned subsidiary of AECOM, participated in a site meeting and inspection with Mr. Mike Sweeney of Pyramid Steel Corporation, the site owner, on October 30, 2015. A site meeting and site inspection also occurred in October 2014. These annual visits are the only opportunities URS personnel has had to access to the site since submission of the last PRR in October 2013. Therefore, our evaluation is based largely upon information regarding site changes provided by Mr. Sweeney. Based on our interview with Mr. Sweeney and observations of current conditions the ECs (soil, concrete and asphalt covers, and fencing) are present and operating as intended. In addition, the owner reports no subsurface disturbances have occurred over the last two years and there were no visual indications of disturbances. Observations indicated that the site activities are in compliance with the ICs.

2.0 SITE OVERVIEW

2.1 SITE LOCATION AND DESCRIPTION

The site is located in the City of Buffalo, County of Erie, New York and is identified as tax parcel number 101.46-3-1 on the Erie County Tax Map. The site is an approximately 2.25-acre area bounded by residential homes along French Street to the north, Urban Street to the south, apartments and a playground to the east, and railroad tracks to the west (see Figure 1).

The site is located in a developed area of relatively flat land in an urban section of Buffalo. The property contains a brick building. As shown in Figure 1, more than half the site is either paved (asphalt cover) or covered by the building. The remainder of the site is covered with a 12 inch soil cover stabilized with turf grass.

The surface soils consist primarily of poorly drained silts and clays. The depth to groundwater and bedrock has not been determined as neither groundwater nor bedrock were encountered in borings advanced 32 feet below ground surface, the total depth of exploration. Based on the USGS topographic map, there are no surface water bodies within a one-mile radius of the site. The nearest surface water body shown on the map is Scajaquada Creek, which is one and one-half miles northwest of the site. The creek flows northwest, away from the site, and ultimately discharges into Lake Erie.

Storm water runoff enters on-site catch basins and is directed through the combined storm and sanitary sewer to the public sewer on French Street. During normal flow conditions, the flow is discharged to the publicly-owned treatment works (POTW) on Squaw Island. During heavy storms, the flow discharges directly to Scajaquada Creek.

2.2 REMEDIAL PROGRAM

Remedial actions were performed to address PCBs located throughout the interior of the building and in both on-site and off-site soil outside the building. To address the PCBs, in September 1996, GE signed an Order on Consent with the NYSDEC. The remediation cleanup goals for the property are summarized below.

Remediation Cleanup Goals

Media	Remediation Goal
Impervious non-porous surfaces, including machinery and equipment, windows, painted walls, and ceiling, and the Johnson Heater Unit	10 microgram per 100 square centimeters (µg/100 cm^2) PCBs
Impervious porous surfaces, including concrete floors and the walls and floor of the transformer pit	10 µg/100 cm^2 PCBs (wall wipe samples) 50 mg/kg PCBs (concrete chip samples) 100 µg/100 cm^2 PCBs and encapsulation (concrete floor wipe samples)
Soil from 0 to 1 foot in depth	1 mg/kg PCBs
Soil at depths greater than 1 foot	10 mg/kg PCBs
Soil along the foundation of the building that contains more than 10 mg/kg PCBs	Covered with an HDPE barrier and the area backfilled with clean soil
Soil near the former fuel oil UST	NYSDEC STARS Memo #1 guidance levels
Sewers	Cleaned and sediment removed

Remedial actions undertaken at the site included decontamination of the building, soil removal and construction of cover systems. The remediation work was conducted in two phases. The first phase, conducted in 1997, included roof cleaning, on-site sewer cleaning and replacement, and the demolition of a steel storage shed. The second phase of remediation began in May 1997 and was substantially completed by December 1999, with the sewer work completed in 2007. The second phase of remediation included demolition and disposal of portions of the main building, replacement of the building's concrete floor, excavation and off-site disposal of 7,000 tons of soil, asphalt paving of 31,000 square feet of parking lots, and cleaning of on and off-site sewers.

As part of the selected remedy engineering and institutional controls were put into place to protect human health and the environment. Engineering controls to prevent exposure to residually impacted soil at the site include a cover system placed over the site. The cover system is comprised of a minimum of 12 inches of clean soil and/or asphalt pavement, depending on the location, and the concrete building slab. Institutional controls include adherence to the Environmental Notice and SMP for the site. The EC/ICs are described further in Section 4.0.

3.0 REMEDY EVALUATION

3.1 REMEDY SUMMARY

Remedial actions at the site were performed in accordance with the remedial work plans and subsequent NYSDEC-approved modifications. The cleanup goals were achieved with the exception of an area along the south property boundary where soil with one semi-volatile organic compound (SVOC), naphthalene, was present in the sidewall sample from the former underground storage tank excavation at a concentration greater than STARS criteria.

Contaminants remaining at the site include soil with residual concentrations of PCBs underneath a cover layer throughout the property and a limited area with soils containing volatile organic compounds (VOCs). The areas of impact are shown on Figure 1. Specifically the remaining impacts and their corresponding protective measures include:

1. **Exterior Areas:** Soils containing PCBs at levels above one mg/kg and less than or equal to 10 mg/kg are covered with a 12 inch cover layer comprised of soil and/or asphalt pavement, depending on the specific location.

2. **Exterior Area, adjacent to southern wall of the building:** VOCs greater than unrestricted use values are located in an area 50 feet long by two feet wide adjacent to the building foundation. A geotextile fabric and 12 or more inches of soil cover this area.

3. **Main Building Area:** Soils in this area and reinforced concrete associated with a former transformer pit contain PCBs at concentrations greater than one mg/kg and less than or equal to 10 mg/kg. This area is covered with reinforced concrete flooring.

A Site Management Plan (SMP) was prepared to manage the residual impacts at the site following implementation of the remedial actions and requires that site inspections be performed at least annually to assess the Engineering Controls (ECs). The site inspections are to be documented in Periodic Review Reports (PRRs) to document the assessment of site conditions and certify all Engineering Controls (ECs)/Institutional Controls (ICs) required by the remedy for the site are in place and operating as designed, or identify corrective actions needed.

3.2 2015 REMEDY REVIEW

On behalf of GE, URS Corporation – New York (URS), now a wholly owned subsidiary of AECOM, participated in a site meeting and inspection with NYSDEC and Mr. Mike Sweeney of Pyramid Steel Corporation, the site owner on October 30, 2015. A site meeting and site inspection also occurred in October 2014. These annual visits are the only opportunities URS

personnel has had to access to the site since submission of the last PRR in October 2013. Therefore, our evaluation is based largely upon information regarding site changes provided by Mr. Sweeney. Based on our interview with Mr. Sweeney and observations of current conditions the ECs (soil, concrete and asphalt covers, and fencing) are present and operating as intended. In addition, the owner reported no subsurface disturbances have occurred in the last two years and there was no visual indications of disturbances.

The site is currently being used for storage by Mr. Sweeney and is not actively occupied. The property owner indicated that his near-term intentions were to use the property for storage or to lease it as a warehouse.

Observations and discussions with the owner suggest that the site activities are in compliance with the ICs. The property owner indicated that:

- No parts of the property had been sold, subdivided, or otherwise undergone a tax map amendment;
- No changes in site use had occurred since remedy construction was completed in 1999;
- That no federal, state, or local permits had been obtained; and
- That when put back up for sale, the property would be marketed for industrial use.

4.0 INSTITUTIONAL CONTROL/ENVIRONMENTAL CONTROL COMPLIANCE REPORT

Since soil with residual impacts exists beneath the site, Engineering Controls and Institutional Controls (EC/ICs) are required to protect human health and the environment. The remainder of this section provides descriptions of the ECs and ICs implemented at the site. The last part of this section provides an assessment of compliance with the ECs and ICs.

4.1 ENGINEERING CONTROLS

Engineering controls at the site include:

- Cover systems; and
- Access controls.

Exposure to residually impacted soil/fill at the site is prevented by a cover system placed over the site. This cover system is comprised of a minimum of 12 inches of clean soil and/or asphalt pavement, dependent on the location, and the concrete building slab. Disruption of the cover systems is prevented by controlled access to the site. Access controls consist of a six-foot high chain link fence and lockable gate. The location of each control is shown on Figure 1.

In order to evaluate the effectiveness of the engineering controls, a visual inspection of the cover system and fence is required to be completed at least once a year. The inspection includes documenting areas that might need repair, such as areas of the grass torn up by traffic or plowing activities, deteriorated pavement, and portions of fence damaged that may allow access to the site by unauthorized personnel.

4.2 INSTITUTIONAL CONTROLS

A series of Institutional Controls are required by the Environmental Notice and are implemented under the Site Management Plan. Restrictions that apply to the site are:

- The property may only be used for industrial, manufacturing, and all ancillary or related uses without additional remediation and amendment of the Environmental Notice, as approved by the NYSDEC;
- All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with the SMP;

- The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use;

- Vegetable gardens and farming on the property are prohibited; and

- The site owner will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (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. NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted with the Periodic Review Report every two years and will be certified by a Professional Engineer.

4.3 EC/IC COMPLIANCE

To ensure compliance with EC/IC controls, site-wide inspections are to be performed on a regular scheduled at a minimum of once a year and after all severe weather conditions, emergencies, or site work that may affect ECs. A walk-through and visual inspection was conducted at the site on October 31, 2014 and most recently on October 30, 2015. The Inspection Forms, which include a photographic record, is included in Appendix A. Observations made during the October 30, 2015 site walk indicate that:

- There is no longer turf grass growing on the western portion of the site. This area is well vegetated, and there were no indications of subsurface disturbance.

- The turf grass south of the building is intact and maintained. There was no evidence of disturbance.

- The asphalt pavement is in generally good condition and there was no indication (such as patching) that the pavement has been disturbed. Some minor cracking and heaving is visible near the tree line along the north side of the site and is likely due to the influence of roots. A small area of deteriorated pavement was observed near the concrete pad to the loading dock. This area of pavement is underlain with additional concrete pad structure and no soil is exposed. The deterioration should be monitored. Repair may be necessary in the future.

- The concrete floor slab within the building appears to be intact and there were no indications (such as patching) that the slab had been disturbed, although much of the floor was covered by stored items at the time of the site visit. Minor cracking and

chipping was observed at some expansion joints and along seam with the old floor slab, but the slab is intact and effectively serving as a cover.

- The fence and gate are present and currently functioning as intended. It appears that the fence fabric has been reattached. Several of the fence posts are damaged (bent). A section of fence in the northwest part of the property is leaning, although it is functional. The gate has sustained additional damage since the 2014 site visit, but is functional. The fence condition should continue to be monitored.

Observations made during the October 30, 2015 site walk indicate that the site is in compliance with the restrictions on site use (industrial use only, no groundwater use, and no vegetable gardening or farming). Mr. Sweeney was willing to sign the Owner portion of the certifications required by NYSDEC. The remainder of the certifications attached to this PRR include only those items to which the Qualified Environmental Consultant can attest.

The engineering controls continue to perform as intended and are protective of human health and the environment. The property owner reports that cover materials remain in place and the residual impacted material is undisturbed. No deficiencies were noted. The Inspection Form, including site photographs, is included in Appendix A. The Institutional and Engineering Controls Certification Form is included in Appendix B.

5.0 SITE MONITORING PLAN

The Monitoring Plan describes the measures for evaluating the performance and effectiveness of the cover system to mitigate potential effects of the residually impacted materials. Monitoring of site media is not required. Monitoring of active Engineering Controls is not required at this site because the site remedy does not rely on active systems or controls.

The Site Monitoring Plan includes a visual inspection of the complete cover system and access controls (site fencing) to be conducted at least once a year and after all severe weather conditions, emergencies, or site work that may affect the ECs.

As part of the Site Monitoring Plan, a site-wide inspection was completed on October 31, 2014 and on October 30, 2015. The inspection confirmed the effectiveness of the ECs and compliance with all ICs, including site usage. This PRR documents the 2014 and 2015 inspections completed at the site. Site inspection forms will be maintained on-site beginning with the October 17, 2013 inspection. It is anticipated that the next inspection will be completed in October 2016 and that the next PRR report will be submitted in October 2017.

6.0 CONCLUSIONS AND RECOMMENDATIONS

This PRR was generated to document the implementation of, and compliance with, the site-specific SMP. In order to confirm that IC/ECs are in place and remain effective, a site-wide inspection was conducted on October 31, 2014 and on October 30, 2015. Based on the site inspection and an interview with Mr. Sweeney of Pyramid Steel Corporation, the owner, it was concluded that the engineering and institutional controls at the site remain intact and effective. Therefore, based on the above items, the site remedy continues to be protective of public health and the environment and is performing as intended.

APPENDIX A

INSPECTION FORMS AND PHOTOGRAPHIC RECORDS

Inspection Form

318 Urban Street, Buffalo, New York
NYSDEC Site Number: 9-15-151

Inspection Performed by: DAN MCDAID (Name) CIVIL ENGINEER (Title)

URS (Company) (716) 923-1166 (Phone No.) 257 W. GENESEE ST, SUITE 400 BUFFALO, NY 14202 (Address)

Reason for Inspection: (Annual) Severe Weather Emergency Site Work

Describe Site Use: VACANT, OWNER IS CURRENTLY LOOKING FOR A TENANT

Is site use compliant with Institutional Controls? (Yes) No

Describe General Site Conditions: OVERALL GOOD CONDITION. NW FENCE LOOKS TO BE FALLING OVER

Site Records Up To Date: PROVIDED 2013 I.R. AND SMP TO OWNER (Yes) No

Cover System Status

12-Inch Soil and Turf Grass Area Condition: Is cover effective? (Yes) No
- Is cover intact? (Yes) No
- Does cover need maintenance? Yes (No)

Asphalt Cover Area and Exterior Concrete Slab Condition: Is cover effective? (Yes) No
- Is cover intact? (Yes) No
- Does cover need maintenance? Yes (No) MINOR CRACKS, SOME LIGHT HEAVING

Interior Concrete Slab Condition: Is cover effective? (Yes) No
- Is cover intact? (Yes) No

Site Security: Is security effective? (Yes) No

Fence and Gate Condition:
- Is fencing functional? (Yes) No
- Is maintenance needed? (Yes) No

Recommendations for maintenance: GATE NEEDS MINOR REPAIRS. FENCE ON N.W. SIDE NEEDS REPAIR

Additional comments: POSSIBLE SMALL ROOF LEAK NEAR BATHROOM
ANIMAL BURROW NEAR SOUTHERN ENTRANCE

Corrective Measures necessary? NO

Residually impacted material remains undisturbed? (Yes) No
Engineering controls continue to protective of human health and the environment? (Yes) No
Site compliant with SMP and Deed Restriction? (Yes) No

Signature

10-31-14 (Inspection Date)

Attachments: Additional Comments (Site Map with Notations) (Photographs)

Page ___ of ___

FRENCH STREET

N

STONE RETAINING WALL

FENCE FALLING OVER

RESIDENTIAL | RESIDENTIAL | RESIDENTIAL | RESIDENTIAL | RESIDENTIAL | RESIDENTIAL | RESIDENTIAL

MINOR CRACKING

PROPERTY & FENCE LINE

CSX RAILWAY

12-INCH SOIL WITH TURF GRASS COVER AREA

COMPRESSOR ROOM | GARAGE

BATHROOM

POSSIBLE ROOF LEAK

STAIRS

FORMER TRANSFORMER PIT WITH RESIDUALLY IMPACTED CONCRETE

ASPHALT COVER AREA

318 URBAN STREET BUILDING

C.B.

MINOR CRACKING NEAR C.B.

PLAYGROUND

ASPHALT COVER AREA

LEGEND:

FENCE

PROPERTY LINE

STEPS

ANIMAL BURROW

12-INCH SOIL WITH TURF GRASS COVER AREA

PROPERTY & FENCE LINE

URBAN STREET

SOURCE: "FINAL EXCAVATION PLAN", OCTOBER 20, 1997 (REVISED NOVEMBER 10, 1997) BAC KILLAM CONSULTING ENGINEERS, BUFFALO, NEW YORK.

0 25 50

GRAPHIC SCALE IN FEET

Title:	SITE MAP
Location:	318 URBAN STREET BUFFALO, NEW YORK
Client:	GENERAL ELECTRIC COMPANY

URS Corporation
3 Corporate Drive, Suite 203
Clifton Park, New York 12065

Drafter: KP	Date: March 2012
Drg. Size: 11 x 17	Job No.: 38394784.20000

FIGURE D-1

J:\38394784.GE Urban Street 2011\SMP\FINAL SMP\Fig D-1 Site Map for Inspections.dwg User:melissa_evasius May 27, 2012 - 1:09pm

PHOTOGRAPHIC RECORD		
2014 Site Observations		
URS Project No.: **38394784**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 1

Date: 10/31/14

Direction:

Northeast

Description:

Site entrance with secured gate. Note some damage to the gate in the lower-left corner.

PHOTO NO: 2

Date: 10/31/14

Direction:

East

Description:

Pavement cracks observed in asphalt lot to the east of the building.

PHOTOGRAPHIC RECORD		
2014 Site Observations		
URS Project No.: **38394784**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 3

Date: 10/31/14

Direction:

Northwest

Description:

Cracks in asphalt pavement that appear to propagate from the catch basin to the east of the building.

PHOTO NO: 4

Date: 10/31/14

Direction:

Southwest

Description:

Damage to the asphalt at the concrete loading dock ramp. There is concrete beneath the damaged asphalt. Also note the minor cracking in the pavement in the foreground.

PHOTOGRAPHIC RECORD		
2014 Site Observations		
URS Project No.: **38394784**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 5

Date: 10/31/14

Direction:

West

Description:

Looking along the south side of the building at the intact grass cover area.

PHOTO NO: 6

Date: 10/31/14

Direction:

North

Description:

An animal burrow located in the grass area next to the southern building entrance.

PHOTOGRAPHIC RECORD		
2014 Site Observations		
URS Project No.: **38394784**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 7 **Date:** 10/31/14 **Direction:** Southwest **Description:** Fencing at the southwest corner of the property. The fence is intact and stable despite being a bit uneven.	
PHOTO NO: 8 **Date:** 10/31/14 **Direction:** Northwest **Description:** Fence at the northwest corner of the site that is at risk of falling over.	

PHOTOGRAPHIC RECORD		
2014 Site Observations		
URS Project No.: **38394784**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 9 **Date:** 10/31/14 **Direction:** Northeast **Description:** The asphalt pavement at the western side of the building, which is in good shape despite some minor cracks.	
PHOTO NO: 10 **Date:** 10/31/14 **Direction:** Southeast **Description:** The grass cover area to the northwest of the building, and the asphalt lot adjacent to the building. Both are intact with only some minor cracking in the pavement. There is also some debris left on site on the pavement (photo right).	

PHOTOGRAPHIC RECORD		
2014 Site Observations		
URS Project No.: **38394784**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 11 **Date:** 10/31/14 **Direction:** South **Description:** A manhole with an apparent asphalt replacement around it.	
PHOTO NO: 12 **Date:** 10/31/14 **Direction:** East **Description:** Asphalt pavement at the northeast corner of the building in good shape, with only some minor cracking.	

PHOTOGRAPHIC RECORD		
2014 Site Observations		
URS Project No.: **38394784**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 13 **Date:** 10/31/14 **Direction:** South **Description:** Some breaches in the asphalt pavement, resulting from tree growth, along the northeastern corner of the building.	
PHOTO NO: 14 **Date:** 10/31/14 **Direction:** Northeast **Description:** Concrete floor inside the building is in generally very good condition, despite some minor cracking as shown here.	

PHOTOGRAPHIC RECORD		
2014 Site Observations		
URS Project No.: **38394784**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 15

Date: 10/31/14

Direction:

Northwest

Description:

Concrete floor slab in the northwest corner of the building, with some cracking observed.

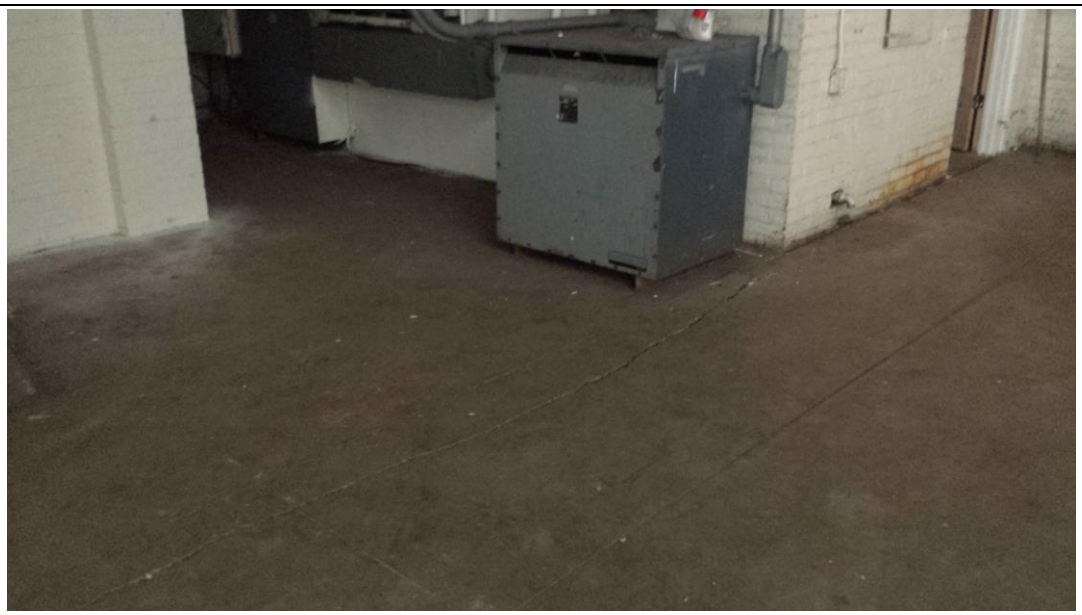


PHOTO NO: 16

Date: 10/31/14

Direction:

North

Description:

A wet spot found in the northwest corner of the building. With no cracking or holes in the wall or floor near here, it appears that this water may be the result of a roof leak.

PHOTOGRAPHIC RECORD		
2014 Site Observations		
URS Project No.: **38394784**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 17

Date: 10/31/14

Direction:

South

Description:

Missing concrete in the southwestern corner of the building floor next to a structural I-beam. This was only about 3 inches deep and concrete is visible at the bottom of the hole.

PHOTO NO: 18

Date: 10/31/14

Direction:

East

Description:

A view of the concrete floor looking east. As shown, the floor is in very good condition.

PHOTOGRAPHIC RECORD		
2014 Site Observations		
URS Project No.: 38394784	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** General Electric Company

PHOTO NO: 19

Date: 10/31/14

Direction:

East

Description:

A crack in the floor next to a southern building entrance. This photo was taken from a staircase at the southwest corner of the building.

PHOTO NO: 20

Date: 10/31/14

Direction:

South

Description:

Some cracking observed at the expansion joints in the floor near the loading dock at the southeast corner of the building.

PHOTOGRAPHIC RECORD 2014 Site Observations		
URS Project No.: **38394784**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 21

Date: 10/31/14

Direction:

Northeast

Description:

An "overview" photo of the building interior. This photo shows most of the main concrete floor slab, which is in good condition.

Inspection Form

318 Urban Street, Buffalo, New York
NYSDEC Site Number: 9-15-151

Inspection Performed by: William Seyched (Name) Environmental Engineer (Title)

URS (AECOM) (716) 308-9722 257 W Genesee St, Buffalo, NY 14202
Company Phone No. Address

Reason for Inspection: (Annual) Severe Weather Emergency Site Work

Describe Site Use: Storage, machinery. Unoccupied for past year. Site is available for lease or sale.

Is site use compliant with Institutional Controls? (Yes) No

Describe General Site Conditions: Generally good. Site is secure, and cover is in place.

Site Records Up To Date: No site documents. Left copy of SMP. Yes (No)

Cover System Status

12-Inch Soil and Turf Grass Area Condition: Is cover effective? (Yes) No
- Is cover intact? (Yes) No
- Does cover need maintenance? Yes (No)

Asphalt Cover Area and Exterior Concrete Slab Condition: Is cover effective? (Yes) No
- Is cover intact? (Yes) No
- Does cover need maintenance? Yes (No)

Interior Concrete Slab Condition: Is cover effective? (Yes) No
- Is cover intact? (Yes) No

Site Security: Is security effective? (Yes) No

Fence and Gate Condition:
- Is fencing functional? (Yes) No
- Is maintenance needed? (Yes) No

Recommendations for maintenance:
- Minor cracks + heaving in exterior pavement. Mr. Sweeney says they may put a sealing coat on next summer.
- Fence and gate intact, but could use some maintenance. Some sections bent and/or leaning.

Additional comments:
- Accompanied by David Szymanski from NYSDEC
- Floor is difficult to observe in its entirety. Sweeney is storing steel equipment/scrap. Materials are heavy, but floor seems to be holding up well.

Corrective Measures necessary? No.

Residually impacted material remains undisturbed? (Yes) No
Engineering controls continue to protective of human health and the environment? (Yes) No
Site compliant with SMP and Deed Restriction? (Yes) No

Signature 10/30/15 Inspection Date

Attachments: Additional Comments (Site Map with Notations) Photographs

FRENCH STREET

N

STONE RETAINING WALL

Fence Falling

RESIDENTIAL | RESIDENTIAL | RESIDENTIAL | RESIDENTIAL | RESIDENTIAL | RESIDENTIAL | RESIDENTIAL

PROPERTY & FENCE LINE

Trees pushing up pavement, growing into fence.

CSX RAILWAY

12-INCH SOIL WITH TURF GRASS COVER AREA

Minor Cracking

COMPRESSOR ROOM | GARAGE

Lots of materials & equipment. Some Parts of floor are hard to see.

cracking & vegetation in low area

Minor Cracking

Minor Cracking

STAIRS

FORMER TRANSFORMER PIT WITH RESIDUALLY IMPACTED CONCRETE

ASPHALT COVER AREA

318 URBAN STREET BUILDING

PROPERTY & FENCE LINE

PLAYGROUND

Minor Cracking

ASPHALT COVER AREA

STEPS

Gate Bent

Minor rutting from tires

12-INCH SOIL WITH TURF GRASS COVER AREA

PROPERTY & FENCE LINE

Gate Bent

LEGEND:

FENCE

PROPERTY LINE

URBAN STREET

SOURCE: "FINAL EXCAVATION PLAN", OCTOBER 20, 1997 (REVISED NOVEMBER 10, 1997) BAC KILLAM CONSULTING ENGINEERS, BUFFALO, NEW YORK.

0 25 50

GRAPHIC SCALE IN FEET

Title:	SITE MAP
Location:	318 URBAN STREET BUFFALO, NEW YORK
Client:	GENERAL ELECTRIC COMPANY

URS

URS Corporation
3 Corporate Drive, Suite 203
Clifton Park, New York 12065

Drafter: KP	Date: March 2012
Drg. Size: 11 x 17	Job No.: 38394784.20000

FIGURE D-1

PHOTOGRAPHIC RECORD 2015 Site Observations		
AECOM Project No.: **60425521**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 1

Date: 10/30/15

Direction:

South

Description:

Overview of pavement on eastern side of building with view of damage to entrance gate. Gate is still functional.

On right is junction of asphalt and concrete pad. No soil is exposed.

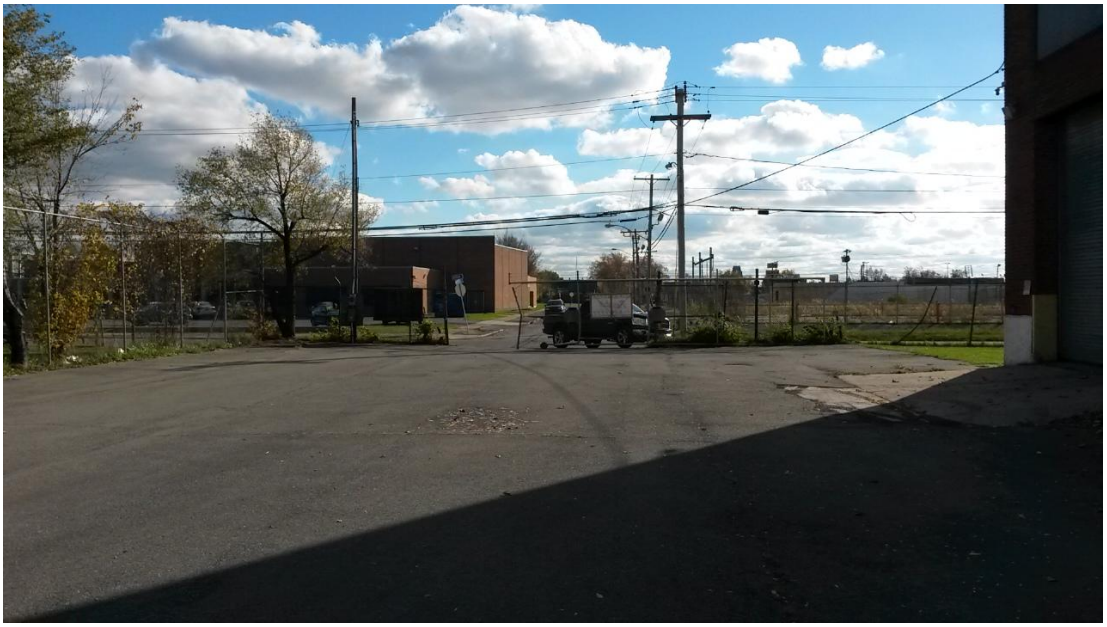


PHOTO NO: 2

Date: 10/30/15

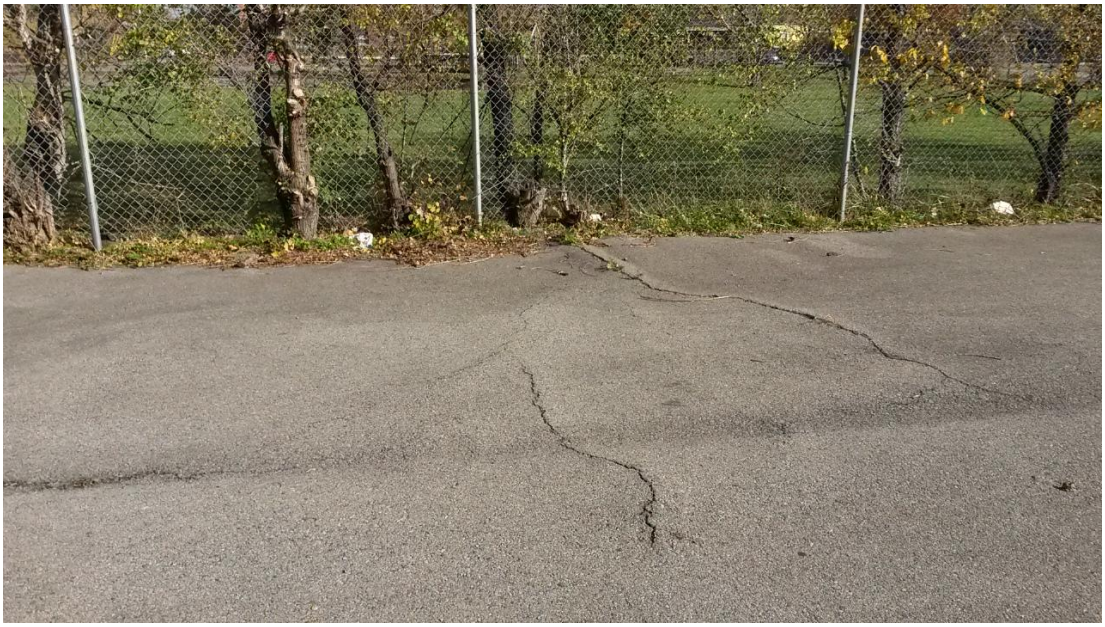
Direction:

East

Description:

View of eastern edge of property.

Cracked and heaving pavement likely due to frost and/or roots.



PHOTOGRAPHIC RECORD		
2015 Site Observations		
AECOM Project No.: **60425521**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 3

Date: 10/30/15

Direction:

--

Description:

Catch basin near northeast property corner. Minor cracking and vegetation growth.

PHOTO NO: 4

Date: 10/30/15

Direction:

North

Description:

Heaving of pavement due to tree growth.

PHOTOGRAPHIC RECORD		
2015 Site Observations		
AECOM Project No.: **60425521**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 5

Date: 10/30/15

Direction:

North

Description:

Cracking and heaving of pavement due to tree growth on neighboring property.

PHOTO NO: 6

Date: 10/30/15

Direction:

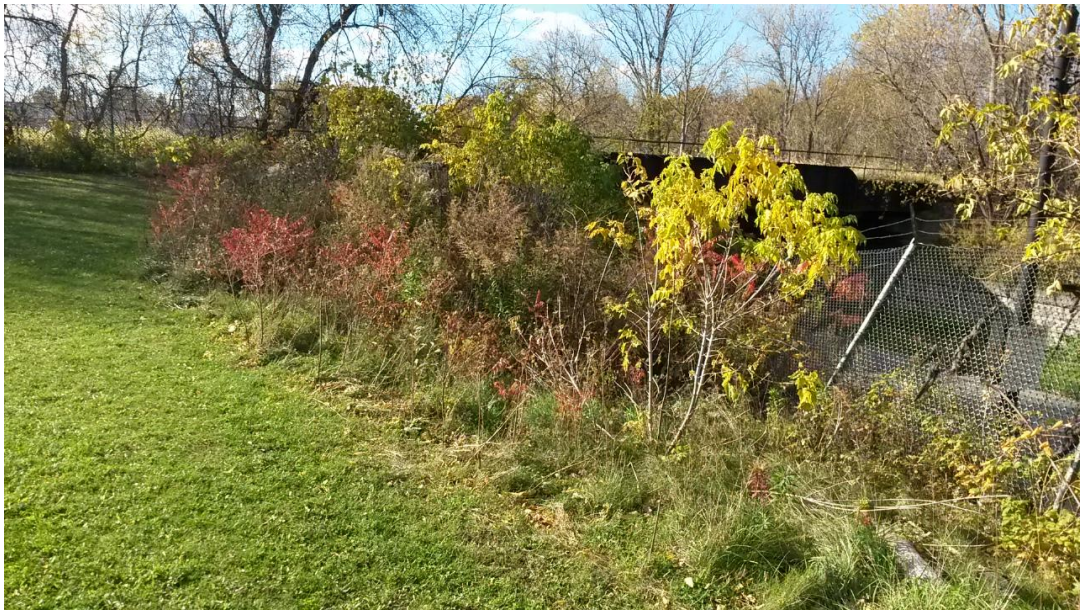
Northwest

Description:

Overview of grass covered northern panhandle of site.

Area is vegetated and maintained.

PHOTOGRAPHIC RECORD		
2015 Site Observations		
AECOM Project No.: 60425521	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** General Electric Company

PHOTO NO: 7 **Date:** 10/30/15 **Direction:** West northwest **Description:** View of leaning fence along French Street. Condition appears to be unchanged from 2014 site visit.	
PHOTO NO: 8 **Date:** 10/30/15 **Direction:** Southwest **Description:** View of western grassy area. Area is vegetated and maintained. Equipment is still stored along western edge of pavement.	

PHOTOGRAPHIC RECORD		
2015 Site Observations		
AECOM Project No.: 60425521	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** General Electric Company

PHOTO NO: 9 **Date:** 10/30/15 **Direction:** East **Description:** View of southern grassy area from the southwest corner of the pavement.	
PHOTO NO: 10 **Date:** 10/30/15 **Direction:** Southeast **Description:** Minor tire ruts (less than 3-inches deep) in grass near southwest pavement corner. Sediment on pavement and soft grass likely due to ponding.	

PHOTOGRAPHIC RECORD 2015 Site Observations		
AECOM Project No.: **60425521**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 11 **Date:** 10/30/15 **Direction:** North **Description:** View of pavement on the western side of building.	
PHOTO NO: 12 **Date:** 10/30/15 **Direction:** East **Description:** View of the pavement condition near the northwest building corner. Minor cracking with vegetation growth.	

PHOTOGRAPHIC RECORD 2015 Site Observations		
AECOM Project No.: **60425521**	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** **General Electric Company**

PHOTO NO: 13 **Date:** 10/30/15 **Direction:** North **Description:** View of trees along the property line north and west of the building. Minor cracks in pavement.	
PHOTO NO: 14 **Date:** 10/30/15 **Direction:** East **Description:** Condition of pavement on north side of building.	

PHOTOGRAPHIC RECORD		
2015 Site Observations		
AECOM Project No.: 60425521	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** General Electric Company

PHOTO NO: 15 **Date:** 10/30/15 **Direction:** East **Description:** Pavement condition on the north side of the building at the east end.	
PHOTO NO: 16 **Date:** 10/30/15 **Direction:** Northwest **Description:** View of the western end of the building, which is being used for storage.	

PHOTOGRAPHIC RECORD		
2015 Site Observations		
AECOM Project No.: 60425521	**Site No.: 915151** **318 Urban Street** **Buffalo, New York**	**Client Name:** General Electric Company

PHOTO NO: 17

Date: 10/30/15

Direction:

West

Description:

Building interior.

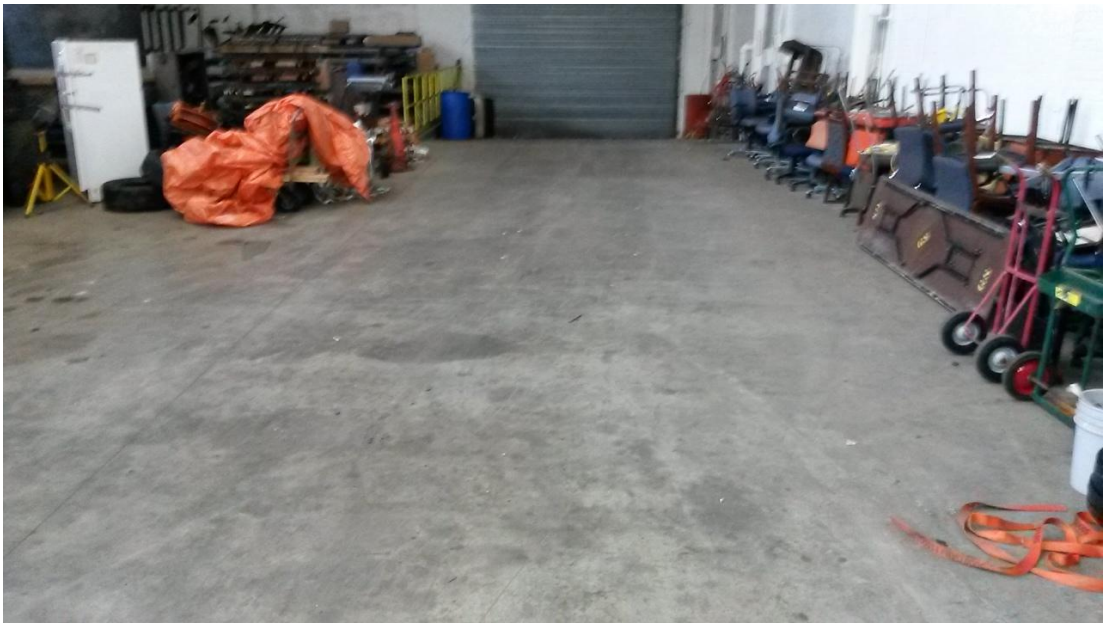


PHOTO NO: 18

Date: 10/30/15

Direction:

West northwest

Description:

Building interior.

The area for the former transformer pit is covered with stored items but building concrete appears undisturbed.

APPENDIX B

CERTIFICATION FORMS

Enclosure 2
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. 915151

Site Name 318 Urban Street

Site Address: 318 Urban Street Zip Code: 14211
City/Town: Buffalo
County: Erie
Site Acreage: 2.5

Reporting Period: August 30, 2013 to August 30, 2015

	YES	NO
1. Is the information above correct?	☒	☐
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?	☐	☒
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	☐	☒
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	☐	☒
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?	☐	☒

Box 2

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial	☒	☐
7. Are all ICs/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.

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

SITE NO. 915151

Box 3

Description of Institutional Controls

Parcel	Owner	Institutional Control
101.46-3-1	Pyramid Steel Corp. (Sweeney Steel Srvc)	IC/EC Plan Ground Water Use Restriction Building Use Restriction Landuse Restriction Soil Management Plan Site Management Plan

An Environmental Notice that references a Site Management Plan. The Site Management Plan includes:
- An Engineering and Institutional Controls Plan. Engineering Controls at the site include a cover system to isolate residual contamination from surface exposure and containment, and site security to prevent unauthorized individuals from site entry.

Institutional controls at the site will include groundwater use restrictions and land use restrictions of the Site to restricted use (i.e. commercial/industrial purposes).
- A Soil/Fill Management Plan to assure that future intrusive activities and soil/fill handling at the Site are completed in a safe and environmentally responsible manner.
- A Site-wide Inspection program to assure that the Engineering and Institutional controls have not been altered and remain effective.

Box 4

Description of Engineering Controls

Parcel	Engineering Control
101.46-3-1	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, 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 compete.

	YES	NO
To the best of my knowledge and belief, and based on a site visit and owner interview on October 30, 2015,	X	☐

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
as to (a), (b), and (e) only	☒	☐

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. 915151

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.

I Michael Sweeney at 318 Urban St 14211,
print name print business address

am certifying as OWNER (Owner or Remedial Party)

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

Michael Sweeney 10/30/15
Signature of Owner, Remedial Party, or Designated Representative Rendering Certification — Date

IC/EC CERTIFICATIONS

Box 7

Professional Engineer Signature

I certify that all information in Boxes 4 and 5 (as modified) 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 Don Porterfield (print name) at 40 British American Blvd, Latham, NY (print business address)

am certifying as a Professional Engineer for the Remedial Party (Owner or Remedial Party)

STATE OF NEW YORK
DON PORTERFIELD
071402
LICENSED PROFESSIONAL ENGINEER

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

Stamp (Required for PE)

Nov-13-2015

Date

designed/expected.

D. O&M Deficiencies - Identify any deficiencies in complying with the O&M plan during this PRR reporting period.

E. Conclusions and Recommendations for Improvements - Provide an overall conclusion regarding O&M for the site and identify any suggested improvements requiring changes in the O&M Plan.

VII. Overall PRR Conclusions and Recommendations

A. Compliance with SMP - For each component of the SMP (i.e., IC/EC, monitoring, O&M), summarize;
   1. whether all requirements of each plan were met during the reporting period
   2. any requirements not met
   3. proposed plans and a schedule for coming into full compliance.

B. Performance and Effectiveness of the Remedy - Based upon your evaluation of the components of the SMP, form conclusions about the performance of each component and the ability of the remedy to achieve the remedial objectives for the site.

C. Future PRR Submittals
   1. Recommend, with supporting justification, whether the frequency of the submittal of PRRs should be changed (either increased or decreased).
   2. If the requirements for site closure have been achieved, contact the Departments Project Manager for the site to determine what, if any, additional documentation is needed to support a decision to discontinue site management.

VIII. Additional Guidance

Additional guidance regarding the preparation and submittal of an acceptable PRR can be obtained from the Departments Project Manager for the site.

Enclosure 3
Periodic Review Report (PRR) General Guidance

I. Executive Summary: (1/2-page or less)
   A. Provide a brief summary of site, nature and extent of contamination, and remedial history.
   B. Effectiveness of the Remedial Program - Provide overall conclusions regarding;
      1. progress made during the reporting period toward meeting the remedial objectives for the site
      2. the ultimate ability of the remedial program to achieve the remedial objectives for the site.
   C. Compliance
      1. Identify any areas of non-compliance regarding the major elements of the Site Management Plan (SMP, i.e., the Institutional/Engineering Control (IC/EC) Plan, the Monitoring Plan, and the Operation & Maintenance (O&M) Plan).
      2. Propose steps to be taken and a schedule to correct any areas of non-compliance.
   D. Recommendations
      1. recommend whether any changes to the SMP are needed
      2. recommend any changes to the frequency for submittal of PRRs (increase, decrease)
      3. recommend whether the requirements for discontinuing site management have been met.

II. Site Overview (one page or less)
   A. Describe the site location, boundaries (figure), significant features, surrounding area, and the nature and extent of contamination prior to site remediation.
   B. Describe the chronology of the main features of the remedial program for the site, the components of the selected remedy, cleanup goals, site closure criteria, and any significant changes to the selected remedy that have been made since remedy selection.

III. Evaluate Remedy Performance, Effectiveness, and Protectiveness
   Using tables, graphs, charts and bulleted text to the extent practicable, describe the effectiveness of the remedy in achieving the remedial goals for the site. Base findings, recommendations, and conclusions on objective data. Evaluations and should be presented simply and concisely.

IV. IC/EC Plan Compliance Report (if applicable)
   A. IC/EC Requirements and Compliance
      1. Describe each control, its objective, and how performance of the control is evaluated.
      2. Summarize the status of each goal (whether it is fully in place and its effectiveness).
      3. Corrective Measures: describe steps proposed to address any deficiencies in ICECs.
      4. Conclusions and recommendations for changes.
   B. IC/EC Certification
      1. The certification must be complete (even if there are IC/EC deficiencies), and certified by the appropriate party as set forth in a Department-approved certification form(s).

V. Monitoring Plan Compliance Report (if applicable)
   A. Components of the Monitoring Plan (tabular presentations preferred) - Describe the requirements of the monitoring plan by media (i.e., soil, groundwater, sediment, etc.) and by any remedial technologies being used at the site.
   B. Summary of Monitoring Completed During Reporting Period - Describe the monitoring tasks actually completed during this PRR reporting period. Tables and/or figures should be used to show all data.
   C. Comparisons with Remedial Objectives - Compare the results of all monitoring with the remedial objectives for the site. Include trend analyses where possible.
   D. Monitoring Deficiencies - Describe any ways in which monitoring did not fully comply with the monitoring plan.
   E. Conclusions and Recommendations for Changes - Provide overall conclusions regarding the monitoring completed and the resulting evaluations regarding remedial effectiveness.

VI. Operation & Maintenance (O&M) Plan Compliance Report (if applicable)
   A. Components of O&M Plan - Describe the requirements of the O&M plan including required activities, frequencies, recordkeeping, etc.
   B. Summary of O&M Completed During Reporting Period - Describe the O&M tasks actually completed during this PRR reporting period.
   C. Evaluation of Remedial Systems - Based upon the results of the O&M activities completed, evaluated the ability of each component of the remedy subject to O&M requirements to perform as

CERTIFICATION OF ENGINEERING AND INSTITUTIONAL CONTROLS

318 Urban Street Site

Buffalo, New York

NYSDEC Site No. 9-15-151

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 directions;
- The institutional control and/or engineering control employed at this site is 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 the environment;
- Nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this control;
- Use of the site is compliant with the Environmental Notice;
- The engineering control systems are performing as intended 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; and
- The information presented in this report is accurate and complete.

I certify that all information and statements in this certification 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, Don Porterfield of 40 British American Blvd, Latham, NY,
print name print business address

am certifying as Engineer for Remedial Party for the site.
Designated Site Representative

Date Nov-13-2015