Lewis S. Streeter
Legacy Site Project Manager

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October 31, 2025

Ms. Megan Kuczka
Project Manager
New York State Department of Environmental Conservation
700 Delaware Avenue
Buffalo, NY 14209-2202

Re: Revised Periodic Review Report and IC/EC Certification
318 Urban Street
Buffalo, New York
NYSDEC Site No. 915151

Dear Ms. Kuczka:

Attached please find a revised Periodic Review Report for the referenced site, prepared by Arcadis of New York, Inc., on behalf of the General Electric Company. The property owner, Mr. Michael Sweeney, accompanied us during site inspections conducted on August 2, 2023, May 3, 2024, and August 30, 2025. Please contact me if you have any questions regarding the attached report.

Sincerely yours,

Lewis S. Streeter
Legacy Site Project Manager

Enclosure:

cc:
Eugene Melnyk, P.E., NYSDEC
Doug Weeks, Arcadis

General Electric Company

Periodic Review Report – August 2022 to August 2025

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

September 2025
Revised October 2025

Periodic Review Report - August 2022 to August 2025

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

September 2025
Revised October 2025

Prepared By:
Arcadis of New York, Inc.
646 Plank Road, Suite 100
Clifton Park
New York 12065
Phone: 518 250 7300

Prepared For:
General Electric Company
Schenectady, New York

Our Ref:
AP013092

Contents

Figure

Appendices

1 Executive Summary

The New York State Department of Environmental Conservation (NYSDEC) became involved in the 318 Urban Street Site (NYSDEC Site #915151; "Site") after an environmental site assessment performed as part of a planned property transfer identified the presence of polychlorinated biphenyls (PCBs) in the property soils. The General Electric Company's (GE's) operations at the property between 1921 to 1968 included the servicing of electrical equipment with PCB-containing dielectric fluid.

Between 1990 and 1993, investigations found PCBs on building and equipment surfaces, in on-site soil, and in on-site sewers. Additionally, off-site soil and the sediments within the public sewer system were found to contain PCBs. There have been two Orders on Consent between GE and NYSDEC for the Site. Under a 1992 Order on Consent GE implemented Interim Remedial Measures (IRMs) to remove PCB-containing surface soil from neighboring properties and PCB-containing sediment from the on-site sewer lines and the Buffalo Sewer Authority's (BSA's) manhole nearest the Site. GE entered a second Order on Consent (Index # B9-0388-91-09) with NYSDEC in September 1996 which 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 two Orders on Consent, GE implemented remedial actions at the Site between 1992 and 1999.

As part of the remedial actions, Engineering Controls (ECs) and Institutional Controls (ICs) were established to address remaining residual PCB impacts at the Site following completion of the remedial work. The residually impacted material contains PCBs at concentrations between the 6 New York Codes, Rules and Regulations (NYCRR) Part 375 Unrestricted Use criteria and the Industrial Use criteria with one exception -- a small area beneath the existing building where remedial actions could not be undertaken without undermining the building foundation.

The ECs and ICs established at the Site include:

- Cover system,
- Access controls,
- Environmental Notice, and
- Site Management Plan (SMP).

The SMP was prepared in May 2012 to identify and manage the residual impacts at the Site following implementation of the remedial actions, and to require that site inspections are performed at least annually to assess the ECs. This Periodic Review Report (PRR) is required by the SMP to document site conditions and provide certification that the ECs and ICs required by the remedy are in place and operating as intended, or if not, to identify corrective actions. The last PRR submitted to NYSDEC in September 2022 (and later revised in February 2023) covered the period August 30, 2019 to August 30, 2022. This PRR covers the Period August 30, 2022 to August 30, 2025.

On behalf of GE, Arcadis of New York, Inc. (Arcadis) completed site inspections on August 2, 2023, May 3, 2024, and June 16, 2025. The Inspection Forms, which include a photographic record, are included in Appendix A. Additionally, herbicide applications are conducted by GE (using a New York State-licensed herbicide applicator) semi-annually to mitigate vegetation growth along the building foundation and within cracks in the asphalt cover system. Observations made during the most recent site inspection in June 2025 indicate that:

- The current asphalt pavement is in generally good condition. A small area (approximately four feet by four feet) of broken/deteriorated asphalt was observed at the base of an equipment/vehicle entrance ramp on the east side of the building. However, a concrete surface is present beneath the deteriorated pavement that would preclude contact with underlying soils.
- The concrete floor slab within the building is intact, with some minor cracking observed, similar to prior inspections. There were no indications (such as patching) that the slab had been disturbed.
- The fence and gate are present and functioning as intended with some minor deficiencies.
- The Site is in compliance with the existing use-restrictions established in the SMP (i.e., industrial use only, no groundwater use, and no vegetable gardening or farming).

At the time of the 2025 inspection, the property was not occupied by any tenant(s). Arcadis observed several drums/containers associated with prior tenants' operations staged outside the building. Neither Arcadis nor GE have any information pertaining to the contents of these containers. At NYSDEC's request Arcadis followed up with the property owner regarding the drums. He indicated that two were empty, one contained hydraulic oil, and two contained xylene. The property owner recently reported that the drums are now staged inside the building. The property owner indicated that he is seeking a new tenant and plans to clear vegetation along the fence line and seal the asphalt pavement.

Based on the inspections, the soil/asphalt/concrete cover system continues to remain effective in preventing exposure to residually impacted soil. Site use remains industrial, in compliance with the ICs. Therefore, the Site remedy (including the IC/ECs) continues to be protective of public health and the environment. GE has recommended to the property owner that a fallen tree in contact with the south fence line be removed, and that the hole in the fence on the western side of the property be repaired as soon as practicable.

2 Site Overview

2.1 Site Location and Description

The Site is located in the City of Buffalo, Erie County, New York and is identified as tax parcel number 101.46-3-1 on the Erie County Tax Map. The approximate 2.5-acre property is relatively flat and 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 property is located in a developed area in an urban section of Buffalo and contains a brick building. As shown in Figure 1, more than half the property is either paved (asphalt cover) or covered by the building. The remainder of the property is covered with a 12-inch-thick soil cover stabilized with turf grass.

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 as part of prior investigations. Based on the United States Geological Survey (USGS) topographic map, there are no surface water bodies within a one-mile radius of the property. The nearest surface water body shown on the topographic map is Scajaquada Creek, which is 1.5 miles northwest of the property. The creek flows northwest, away from the property, and ultimately discharges to Lake Erie.

Stormwater runoff from the property enters catch basins and is directed through the combined storm and sanitary sewer to the public sewer on French Street. During normal rainfall conditions, the stormwater flow is discharged to a sewer system that conveys water to the publicly owned treatment works (POTW) on Squaw Island. During periods of heavy precipitation, the flow discharges directly to Scajaquada Creek.

2.2 Remedial Program

Remedial actions were performed at the Site to address PCBs located within the interior of the building, within on-site and off-site sewers, and in both on-site (outside the building) and off-site soil. The remediation cleanup goals for the Site are summarized below.

Remediation Cleanup Goals

Media / Item	Remediation Goal / Activity
Non-porous surfaces, including machinery and equipment, windows, painted walls, and ceiling, and building heater unit	10 micrograms per 100 square centimeters (µg/100 cm^2) PCBs
Porous surfaces, including concrete floors and the walls and floor of the former transformer pit	10 µg/100 cm^2 PCBs (wall wipe samples) 50 milligrams per kilogram (mg/kg) PCBs (concrete chip samples) 100 µg/100 cm^2 PCBs and encapsulation (concrete floor wipe samples)
Soil (0- to 1-foot depth)	1 mg/kg PCBs – excavation with off-site disposal
Soil (depths greater than 1 foot)	10 mg/kg PCBs – excavation with off-site disposal
Soil at depths greater than 1 foot with Volatile Organic Compounds (VOCs) concentrations exceeding 6 NYCRR Part 375-6.8 Unrestricted Use criteria (area 50 feet long and 2 feet wide near the building foundation on the south side of the building)	Cover areas with a geotextile barrier and backfill with clean soil
Soil near the former fuel oil UST	NYSDEC Spills Technology and Remediation Series (STARS) Memo #1 guidance values
Sewers	Remove sediment and clean infrastructure

There have been two Orders on Consent between GE and NYSDEC for the Site. Under a 1992 Order on Consent GE implemented IRMs to remove PCB-containing surface soil from neighboring properties and PCB-containing sediment from the on-site sewer lines and the BSA's manhole nearest the Site. IRM No. 1 addressed remediation of PCB-containing soil on the residential properties north of the property and was conducted between November

1992 and April 1993. IRM No. 2 addressed removal of PCB-containing sediment from discrete segments of on-site sewer lines and from the nearest BSA sewer manhole on French Street. This work was conducted in the summer of 1993. IRM No. 3 addressed remediation of PCB-containing soil on the playground east of the property and was completed in May 1994.

In September 1996, GE signed the second Order on Consent with the NYSDEC. This second Order required that GE implement the scope of work that was outlined in a 1995 Record of Decision. Remedial actions undertaken at the Site under the 1996 Order on Consent 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 1996 and 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, ECs and ICs were established to protect human health and the environment. Engineering controls to prevent exposure to residual soil impacts at the Site include a cover system comprised of a minimum of 12 inches of clean soil and/or asphalt pavement, depending on the location, and maintaining the existing concrete building slab. Herbicide applications are conducted by GE semi-annually to mitigate vegetation growth along the building foundation and within cracks in the asphalt cover system. ICs include the Environmental Notice and SMP. The EC/ICs are described further in Section 4.

3 Remedy Evaluation

3.1 Remedy Summary

Remedial actions at the Site were performed in accordance with NYSDEC-approved remedial work plans and subsequent 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 was present in the excavation sidewall sample following removal of the former underground storage tank. Specifically, naphthalene was detected at a concentration greater than STARS guidance value.

Following the remedial actions, contaminants remaining in Site soils include PCBs underneath a cover system throughout the property and a limited area of VOCs. The soil areas with residual impacts are shown on Figure 1. Specifically, the remaining residual impacts and their corresponding protective measures include:

1. Exterior Areas: Soils containing PCBs at concentrations greater than 1 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 6 NYCRR Part 375 Unrestricted Use Soil Cleanup Objectives but less than Industrial SCOs are located in an area approximately 50 feet long by two feet wide adjacent to the building foundation. A geotextile fabric and 12 or more inches of vegetated clean soil covers this area.
3. Main Building Area: Soils beneath the existing floor slab and the reinforced concrete slab and walls associated with a former transformer pit contain PCBs at concentrations greater than 1 mg/kg and less than or equal to 10 mg/kg.

A SMP was prepared to manage the residual impacts at the Site following implementation of the remedial actions. The SMP requires that inspections be performed at least annually to assess the ECs, with the results presented in PRRs. In addition to documenting the assessment of property conditions, the PRR includes a certification that ECs/ICs required by the remedy are in place and operating as designed, or identify corrective actions needed.

3.2 Remedy Review

On behalf of GE, Arcadis performed site inspections with Pyramid Steel Corporation, the property owner, on August 2, 2023, May 3, 2024, and June 16, 2025. The evaluations presented herein are based largely upon the inspections and information regarding the Site, and any changes thereto, provided by the owner. The Inspection Forms, which include a photographic record, are included in Appendix A. The results of the site inspections are presented on the inspection forms and the Site's compliance with the ECs and ICs is summarized in Section 4.3

4 Institutional Control/Engineering Control Compliance Report

Since soil with residual impacts remains at the Site, EC/ICs are required to ensure continued protection of human health and the environment. This section describes the ECs and ICs implemented at the Site and includes an assessment of compliance with the ECs and ICs based on the results of the annual site inspections.

4.1 Engineering Controls

Engineering controls at the Site include the cover system and other access restrictions.

Exposure to residually impacted soil is prevented by a cover system comprised of a minimum of 12 inches of clean soil and/or asphalt pavement, dependent on the location, and the concrete building slab. The potential for disturbance of the cover system is mitigated by controlled access to the Site. Access controls consist of a six-foot high chain link fence and lockable gate (Figure 1).

To evaluate the effectiveness of the ECs, 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 soil/vegetation disturbance by traffic or snow plowing activities, areas of deteriorated pavement, sections of damaged fence, etc. that could allow access to the Site by unauthorized personnel.

4.2 Institutional Controls

A series of ICs are required by the Environmental Notice and are implemented under the SMP. Restrictions that apply to the Site are:

- The property may only be used for industrial, manufacturing, and 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 groundwater at the property is prohibited without treatment rendering it safe for its intended use;
- Vegetable gardens and farming are prohibited on the property; and
- The property owner will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) ECs and ICs at the Controlled Property (i.e., the Site) 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 ECs and ICs to protect public health and the environment or that constitute a violation or failure to comply with the SMP. This certification shall be submitted with the PRR every three years and will be certified by a Professional Engineer in the State of New York. NYSDEC retains the right to access such Controlled Property at any time to evaluate the continued maintenance of any and all controls.

4.3 EC/IC Compliance

To verify compliance with EC/IC controls, inspections were conducted by Arcadis, on behalf of GE, on August 2, 2023, May 3, 2024, and June 16, 2025. The Inspection Forms, which include a photographic record, are included in Appendix A. The results of the inspections are summarized in Table 1 below.

EC/IC	2023 Observations/Status	2024 Observations/Status	2025 Observations/Status
Asphalt Pavement	• Generally good condition. • Some cracking and heaving of asphalt observed along north tree line due to the presence of extensive tree roots. • Weeds and other vegetation observed growing within cracks in the asphalt and adjacent to the building. Herbicide applied by GE along building foundation and within asphalt cover system. • Small area of deteriorated asphalt observed at the base of the entrance ramp on the east side of the building.	• Generally good condition. • Some cracking and heaving of asphalt observed along north tree line due to the presence of extensive tree roots. • Weeds and other vegetation observed growing within cracks in the asphalt and adjacent to the building. Herbicide applied by GE along building foundation and within asphalt cover system. • The small area of deteriorated asphalt observed at the base of the entrance ramp on the east side of the building in 2023 was patched with asphalt.	• Generally good condition. • Some cracking and heaving of asphalt observed along north tree line due to the presence of extensive tree roots. • Weeds and other vegetation observed growing within cracks in the asphalt and adjacent to the building. Herbicide applied by GE along building foundation and within asphalt cover system by a NYS-licensed applicator (C7894750). • Small area of deteriorated asphalt observed at the base of the entrance ramp on the east side of the building that was patched with concrete in 2024 appears to be deteriorated again. However, a layer of concrete is present beneath the damaged pavement.
Concrete Floor Slab (within building)	• Intact, minor cracking observed. • No indications (such as patching) that the slab had been disturbed.	• Intact, minor cracking observed. • No indications (such as patching) that the slab had been disturbed.	• Intact, minor cracking observed. • No indications (such as patching) that the slab had been disturbed.

EC/IC	2023 Observations/Status	2024 Observations/Status	2025 Observations/Status
Perimeter Fence and Gate	• Functioning as intended. • Small opening (approximately four feet high by two feet wide) observed in the western fence (i.e., along the CSX railway) • Tree laying on the south fence (i.e., along Urban Street) observed. • Section of fence along French Street was leaning inward, but the fence remains functional.	• Functioning as intended. • Small opening (approximately four feet high by two feet wide) observed in the western fence (i.e., along the CSX railway) • Tree laying on the south fence (i.e., along Urban Street) observed. • Section of fence along French Street was leaning inward, but the fence remains functional.	• Functioning as intended. • Small opening (approximately four feet high by two feet wide) observed in the Site's western fence (i.e., along the CSX railway) • Tree laying on the south fence (i.e., along Urban Street) observed. • Section of fence along French Street was leaning inward, but the fence remains functional.
Site Use	• In compliance with the restrictions on-site use (industrial use, no groundwater use, and no vegetable gardening or farming).	• In compliance with the restrictions on-site use (industrial use, no groundwater use, and no vegetable gardening or farming).	• In compliance with the restrictions on-site use (industrial use, no groundwater use, and no vegetable gardening or farming).

The soil/asphalt/concrete cover system continues to remain effective in preventing exposure to residually impacted soil and Site use remains industrial, in compliance with the ICs. Therefore, the remedy remains protective of human health and the environment. However, GE has communicated to the property owner that the fallen tree on the south fence should be removed, and that the opening in the fence on the western side of the property should be repaired. The Institutional and Engineering Controls Certification Form is included in Appendix B.

5 Site Monitoring Plan

The Monitoring Plan describes the measures for evaluating the performance and effectiveness of the cover system to mitigate potential effects related to the presence of residually impacted materials. Monitoring of Site media is not required. Monitoring of active ECs is not required because the Site remedy does not rely on any active systems or controls.

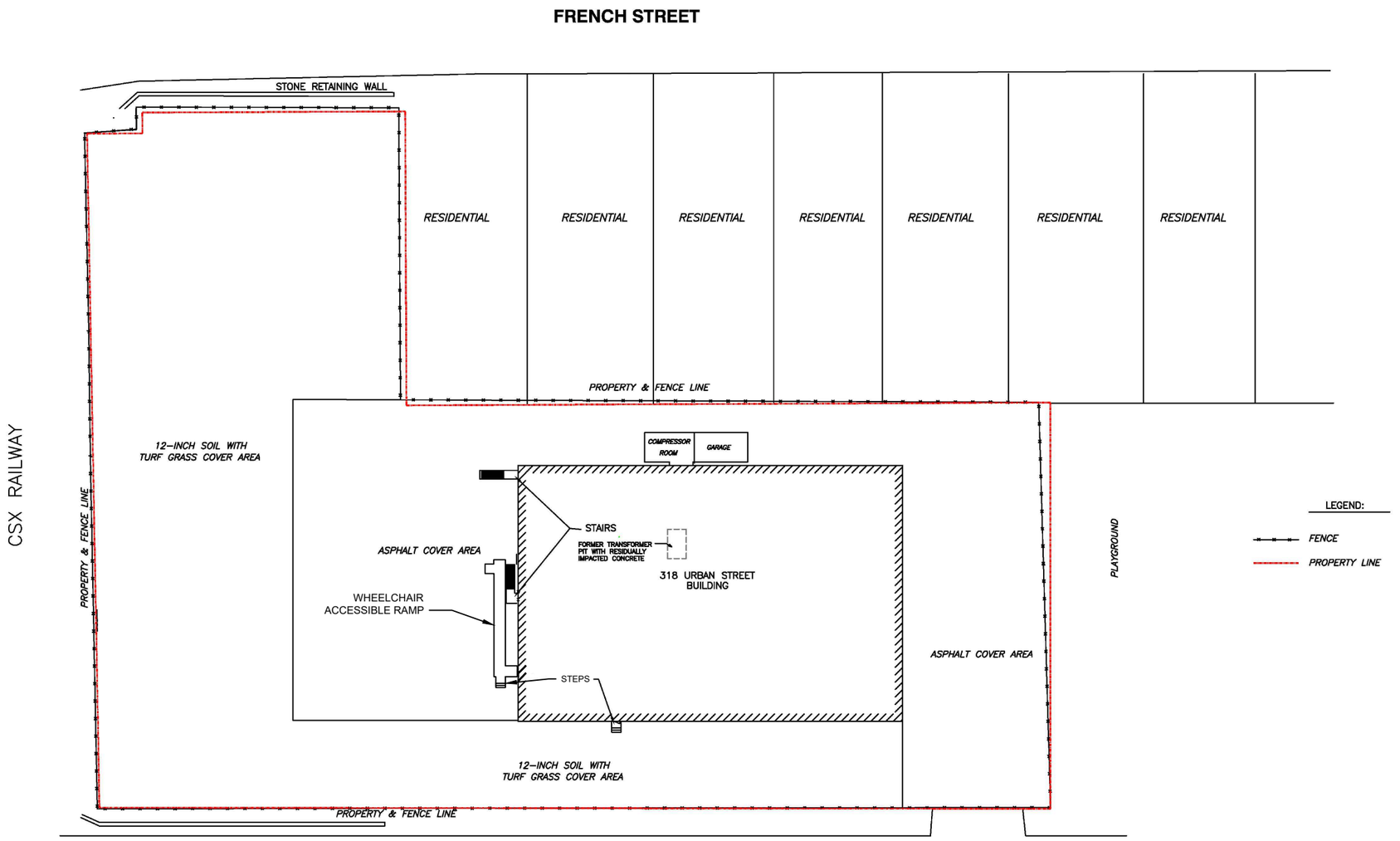
The Site Monitoring Plan requires a visual inspection of the complete cover system and other access controls (site fencing) to be conducted at least once a year and after severe weather conditions, emergencies, or site work that may affect the ECs. Site-wide inspections were completed on August 2, 2023, May 3, 2024, and June 16, 2025. The inspections identified minor deficiencies with respect to the cover system and fence but confirmed the overall continued effectiveness of the ECs and compliance with Site usage.

This PRR documents the 2023, 2024 and 2025 inspections completed at the Site. Site inspection forms will be maintained on-site. It is anticipated that the next inspection will be completed in the summer of 2026 and the next PRR report will be submitted in September 2028, unless otherwise directed by NYSDEC.

6 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, inspections were conducted on August 2, 2023, May 3, 2024, and June 16, 2025. Based on the inspections, the soil/asphalt/concrete cover system continues to remain effective in preventing exposure to residually impacted soil. Site use remains industrial, in compliance with the ICs. Therefore, the Site remedy (including the IC/ECs) continues to be protective of public health and the environment. No changes to the Site monitoring program are recommended at this time. GE recommends that the fallen tree on the south fence line be removed, and that the hole in the fence on the western side of the Site be repaired by the property owner as soon as practicable.

Figure



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

GENERAL ELECTRIC COMPANY
318 URBAN STREET, BUFFALO, NY
PERIODIC REVIEW REPORT

SITE PLAN

ARCADIS

FIGURE
1

Appendix A

Inspection Forms and Photographs

Inspection Form

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

Inspection Performed by: TIM HENSON (Name) FIELD SUPERVISOR (Title)

ARCADIS (Company) 315 671-9369 (Phone No) (Address)

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

Describe Site Use: KERR INDUSTRIES IS CURRENTLY LEASING PROPERTY

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

Describe General Site Conditions: SOME AREAS OF PAVEMENT SHOW SIGNS OF DETERIORATION.

Site Records Up To Date: PROPERTY OWNER KEEPS SMP IN HIS VEHICLE (Yes) No

Cover System Status

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

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

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

Site Security:
- Is security effective? Yes (No)

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

FENCE SHOULD BE REPAIRED

Recommendations for maintenance:
FOUND HOLE CUT IN FENCE ON WEST SIDE OF SITE, ADJACENT TO CSX TRACKS. RECOMMEND REPAIR
LARGE DEAD TREE LAYING ON SOUTH SIDE FENCE ALONG URBAN ST.

Additional comments:
MEGAN KULCZAK OF NYSDEC WAS ON-SITE
LAWN DOCTOR WAS ON-SITE FOR FIRST HERBICIDE APPLICATION.

Corrective Measures necessary?

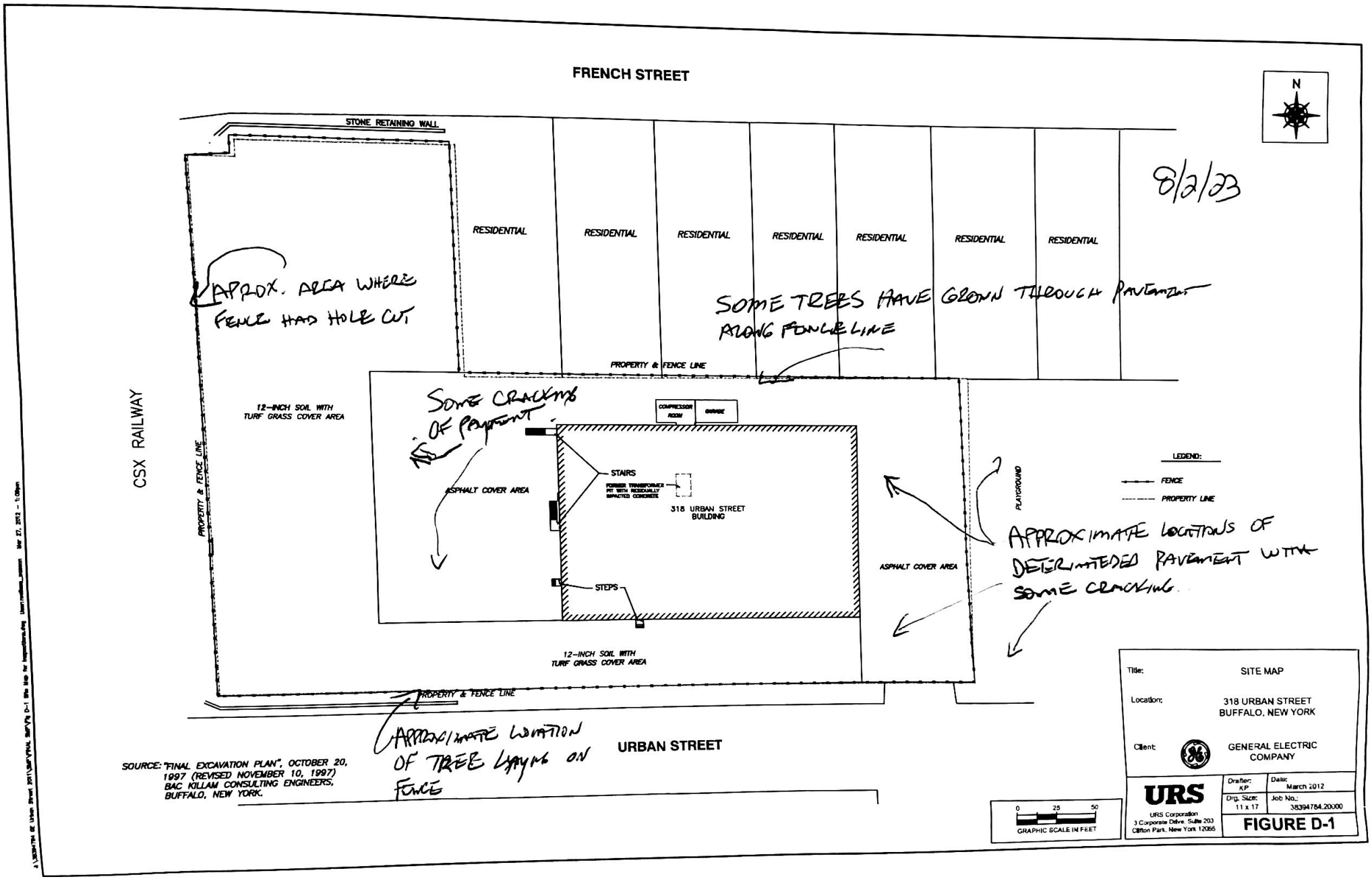
Residually impacted material remains undisturbed? (Yes) No
Engineering controls continue to protective of human health and the environment? (Yes) No
Site compliant with SMP and Deed Restriction? (Yes) No

Signature SITE MAP

8/2/23 (Inspection Date)

Attachments: Additional Comments YES Site Map with Notations YES Photographs

INCLUDING SITE MAP


FRENCH STREET
N
8/2/23
STONE RETAINING WALL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
APPROX. AREA WHERE FENCE HAD HOLE CUT
SOME TREES HAVE GROWN THROUGH PAVEMENT ALONG FENCE LINE
PROPERTY & FENCE LINE
CSX RAILWAY
12-INCH SOIL WITH TURF GRASS COVER AREA
SOME CRACKING OF PAVEMENT
COMPRESSOR ROOM
GARAGE
STAIRS
FORMER TRANSFORMER PIT WITH RESIDUALLY IMPACTED CONCRETE
ASPHALT COVER AREA
318 URBAN STREET BUILDING
STEPS
PLAYGROUND
ASPHALT COVER AREA
APPROXIMATE LOCATIONS OF DETERIORATED PAVEMENT WITH SOME CRACKING
LEGEND:
FENCE
PROPERTY LINE
12-INCH SOIL WITH TURF GRASS COVER AREA
PROPERTY & FENCE LINE
APPROXIMATE LOCATION OF TREE LYING ON FENCE
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

Project Photographs

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #1

Date:
August 2, 2023

Description:
View from mezzanine looking east.

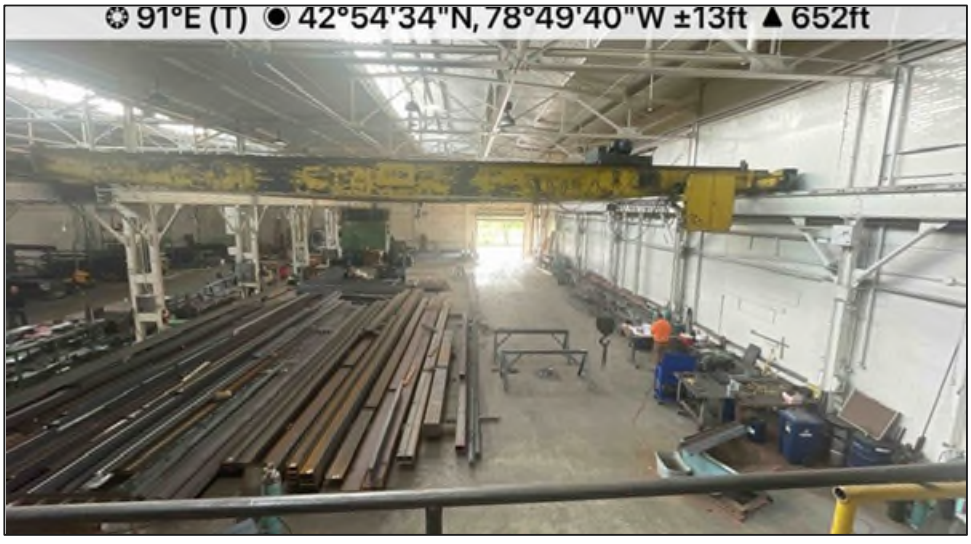


Photo: #2

Date:
August 2, 2023

Description:
View from mezzanine looking east towards loading ramp.

Photo: #3

Date:
August 2, 2023

Description:
Loading ramp area.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #4

Date:
August 2, 2023

Description:
Area at bottom of ramp where pavement has deteriorated.

Photo: #5

Date:
August 2, 2023

Description:
North side of building.

Photo: #6

Date:
August 2, 2023

Description:
North side of building; dense vegetation along fence line.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #7

Date:
August 2, 2023

Description:
Fence along French St. Condition appears unchanged from 2022 inspection.

Photo: #8

Date:
August 2, 2023

Description:
North fence line; vegetation along fence line.

Photo: #9

Date:
August 2, 2023

Description:
West side of building; minor cracking in pavement observed.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #10

Date:
August 2, 2023

Description:
West side lawn area.

Photo: #11

Date:
August 2, 2023

Description:
West side of building; handicap access ramp.

Photo: #12

Date:
August 2, 2023

Description
Fence along CSX railway; hole cut in fence.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #13

Date:
August 2, 2023

Description:
Parking area on east side of building; minor cracking in pavement observed.

Photo: #14

Date:
August 2, 2023

Description:
East side of building; minor cracking in pavement observed.

Photo: #15

Date:
August 2, 2023

Description:
South fence line where fence was repaired; condition appears unchanged from previous years.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #16

Date:
August 2, 2023

Description:
South fence line; fallen tree lying on fence.

Photo: #17

Date:
August 2, 2023

Description:
South side of building.

Photo: #18

Date:
August 2, 2023

Description:
Main entrance gate to property.

Inspection Form

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

Inspection Performed by: KIM HENSON (Name) FIELD SUPERVISOR (Title)

ARCADIS (Company) 315-671-9369 (Phone No) (Address)

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

Describe Site Use: KEEFE INDUSTRIES IS CURRENTLY LEASING PROPERTY

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

Describe General Site Conditions: SOME AREAS OF PAVEMENT SHOW SIGNS OF DETERIORATION

Site Records Up To Date: PROPERTY OWNER KEEPS SMP IN HIS VEHICLE (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: FENCE SHOULD BE REPAIRED
- Is fencing functional? (Yes) No
- Is maintenance needed? (Yes) No

Recommendations for maintenance: PROPERTY OWNER SAYS TENENTS ARE RESPONSIBLE FOR
- HOLE IN WEST FENCE LINE ADJACENT TO CSX TRACKS. REPAIRS RECOMMEND REPAIR.
- LARGE DEAD TREE LAYING ON SOUTH SIDE OF FENCE ALONG URBAN ST.

Additional comments:

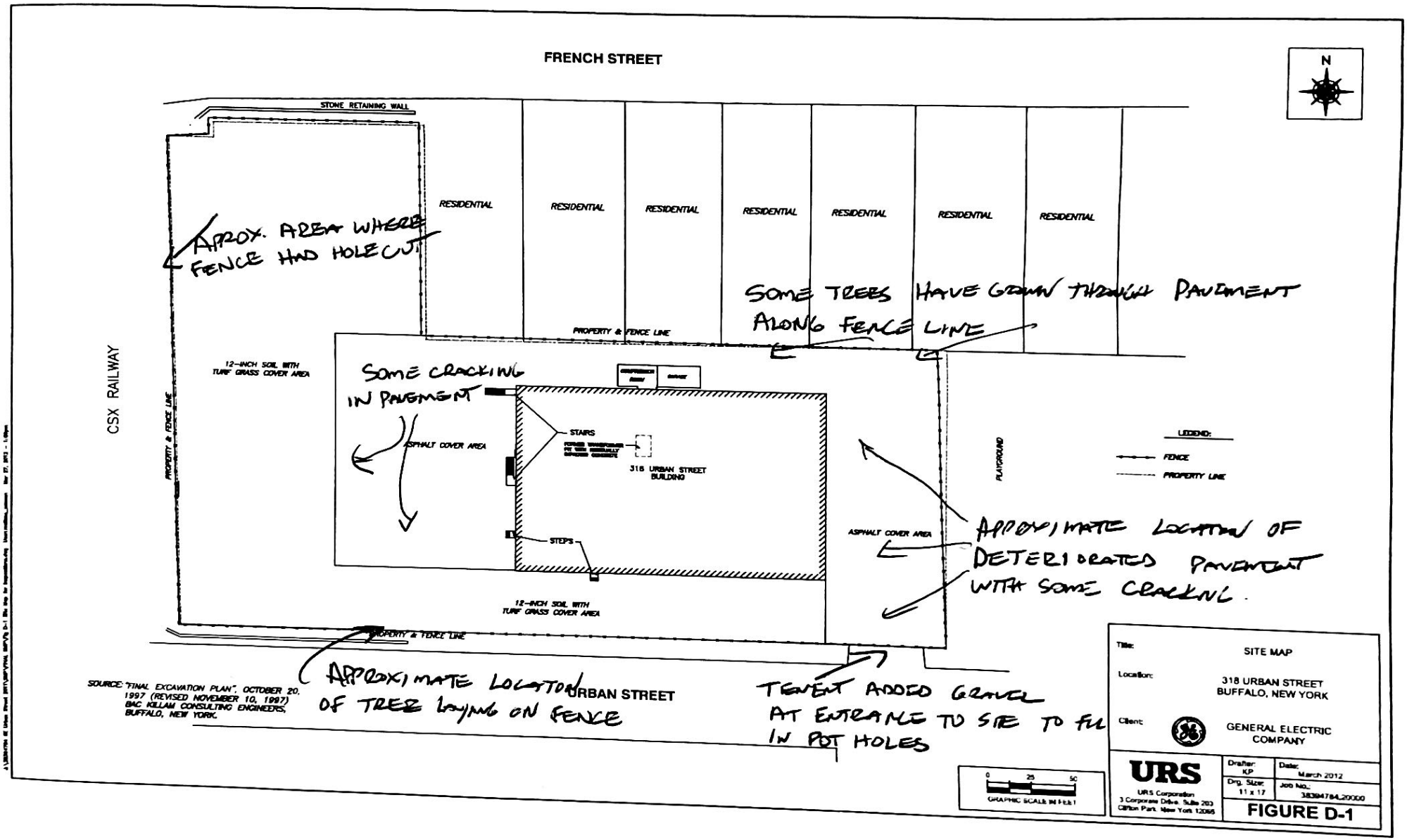
LAWN DOCTOR WAS ON-SITE FOR SPRING HERBICIDE APPLICATION.

Corrective Measures necessary?

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 5/3/24 (Inspection Date)

Attachments: SITE MAP Additional Comments YES Site Map with Notations YES Photographs


FRENCH STREET
N
STONE RETAINING WALL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
APPROX. AREA WHERE FENCE HAD HOLE CUT
SOME TREES HAVE GROWN THROUGH PAVEMENT ALONG FENCE LINE
PROPERTY & FENCE LINE
CSX RAILWAY
12-INCH SOIL WITH TURF GRASS COVER AREA
SOME CRACKING IN PAVEMENT
ASPHALT COVER AREA
STAIRS
318 URBAN STREET BUILDING
STEPS
12-INCH SOIL WITH TURF GRASS COVER AREA
PLAYGROUND
ASPHALT COVER AREA
LEGEND:
FENCE
PROPERTY LINE
APPROXIMATE LOCATION OF DETERIORATED PAVEMENT WITH SOME CRACKING.
APPROXIMATE LOCATION OF TREE LYING ON FENCE
URBAN STREET
TENANT ADDED GRAVEL AT ENTRANCE TO SITE TO FILL IN POT HOLES
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.: 38384784.20000
FIGURE D-1

Project Photographs

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #1

Date:
May 3, 2024

Description:
View from mezzanine looking east.

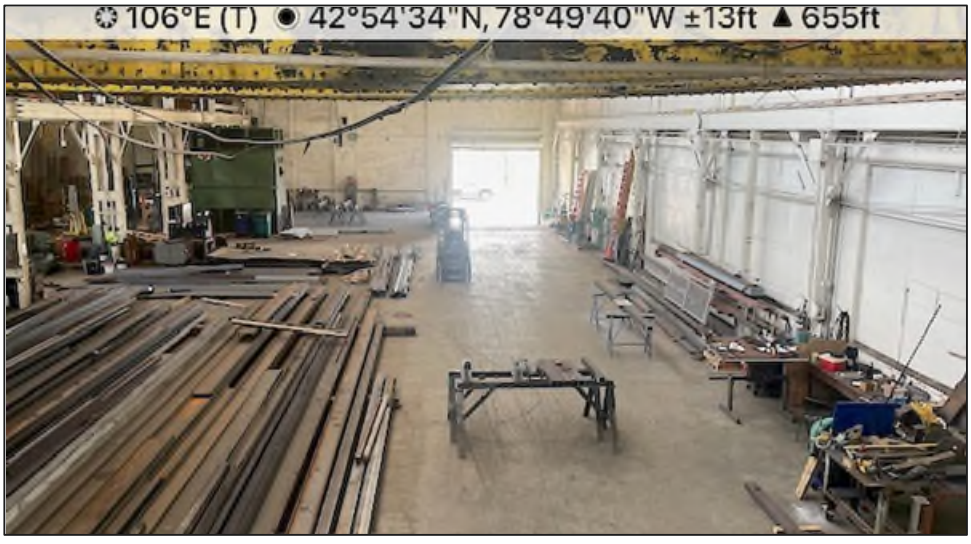


Photo: #2

Date:
May 3, 2024

Description:
View from mezzanine looking east towards loading ramp.

Photo: #3

Date:
May 3, 2024

Description:
Loading ramp area.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #4

Date:
May 3, 2024

Description:
Area at bottom of ramp where pavement has been patched.

Photo: #5

Date:
May 3, 2024

Description:
North side of building.

Photo: #6

Date:
May 3, 2024

Description:
North side of building; dense vegetation along fence line.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #7

Date:
May 3, 2024

Description:
Fence along French St. Condition appears unchanged from 2023 inspection.

Photo: #8

Date:
May 3, 2024

Description:
North fence line; vegetation along fence line.

Photo: #9

Date:
May 3, 2024

Description:
Oil drums containing used oil from the tenant's equipment.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #10

Date:
May 3, 2024

Description:
West side of building; minor cracking in pavement observed.

Photo: #11

Date:
May 3, 2024

Description:
West side lawn area.

Photo: #12

Date:
May 3, 2024

Description
West side of building; handicap access ramp.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #13

Date:
May 3, 2024

Description:
Fence along CSX railway; hole cut in fence.

Photo: #14

Date:
May 3, 2024

Description:
Parking area on east side of building; minor cracking in pavement observed.

Photo: #15

Date:
May 3, 2024

Description:
Site entrance; gravel added to site entrance to fill potholes.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #16

Date:
May 3, 2024

Description:
South fence line where fence was repaired; fallen tree lying on fence.

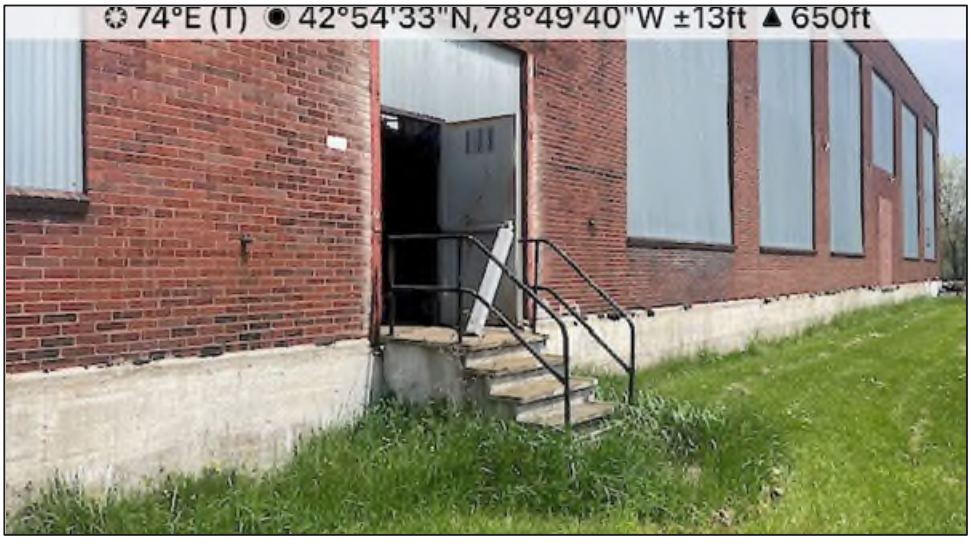


Photo: #17

Date:
May 3, 2024

Description:
South side of building.

Photo: #18

Date:
May 3, 2024

Description:
Main entrance gate to property.

Inspection Form

318 Urban Street, Buffalo, New York

NYSDEC Site Number: 9-15-151

Inspection Performed by: TIM HENSON (Name) FIELD SUPERVISOR (Title)

ARCADIS 315 671-9369 (Company / Phone No / Address)

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

Describe Site Use: KERR INDUSTRIES NO LONGER LEASES THE PROPERTY AS OF FIRST WEEK OF JUNE 2025. TENANT LEFT SOME ITEMS INSIDE BUILDING.

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

Describe General Site Conditions: SOME AREAS OF PAVEMENT SHOW SIGNS OF DETERIORATION.

Site Records Up To Date: PROPERTY OWNER KEEPS SMP IN HIS VEHICLE (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:

- HOLE IN WEST FENCE LINE ADJACENT TO CSX TRACKS, RECOMMENDED REPAIR
- LARGE DEAD TREE LAYING ON SOUTH SIDE OF FENCE ALONG URBAN ST.

Additional comments:

- JASON VOGEL OF ARCADIS ON SITE TO APPLY SPRING HERBICIDE APPLICATION ALONG OUTSIDE OF BUILDING PERIMETER + ON CRACKS OF PAVEMENT.
- PROPERTY OWNER HAD 2 WORKERS ON-SITE CLEARING BRUSH ALONG THE BUILDING + FENCE LINE ALONG THE EAST + NORTH
- OWNER PLANNED ON HAVING PAVEMENT SEALED IN NEAR FUTURE.

Corrective Measures necessary?

Residually impacted material remains undisturbed? (Yes) No

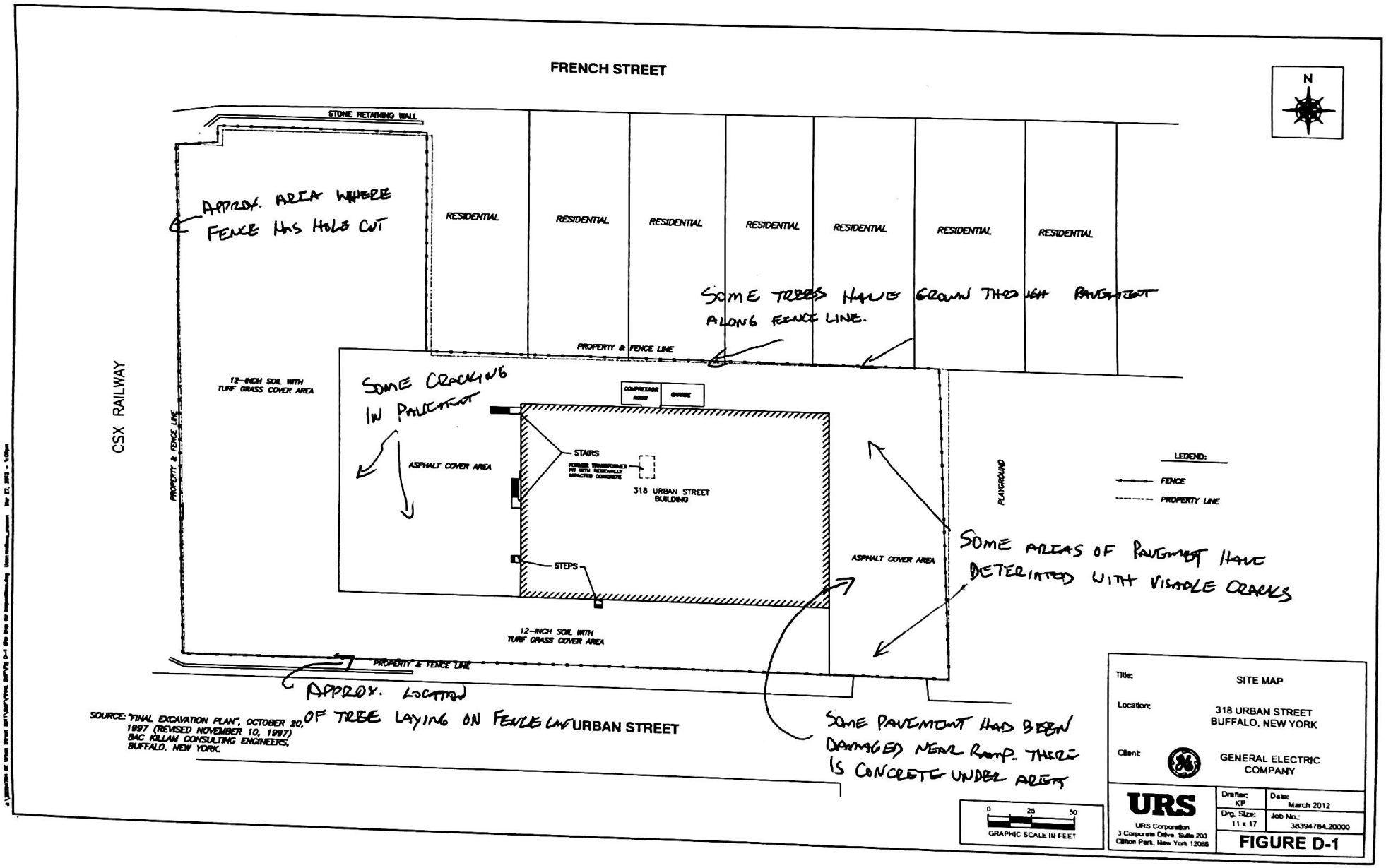
Engineering controls continue to protective of human health and the environment? (Yes) No

Site compliant with SMP and Deed Restriction? (Yes) No

Signature

6/16/25 (Inspection Date)

Attachments: SITE MAP Additional Comments Site Map with Notations YES Photographs YES


FRENCH STREET
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APPROX. AREA WHERE FENCE HAS HOLE CUT
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RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
RESIDENTIAL
SOME TREES HAVE GROWN THROUGH PAVEMENT ALONG FENCE LINE.
PROPERTY & FENCE LINE
CSX RAILWAY
12-INCH SOIL WITH TURF GRASS COVER AREA
SOME CRACKING IN PAVEMENT
COMPRESSOR ROOM
GARAGE
STAIRS
FORMER TRANSFORMER PIT WITH RESIDUALLY IMPACTED CONCRETE
318 URBAN STREET BUILDING
ASPHALT COVER AREA
STEPS
PLAYGROUND
LEGEND:
FENCE
PROPERTY LINE
SOME AREAS OF PAVEMENT HAVE DETERIORATED WITH VISABLE CRACKS
ASPHALT COVER AREA
12-INCH SOIL WITH TURF GRASS COVER AREA
PROPERTY & FENCE LINE
APPROX. LOCATION OF TREE LAYING ON FENCE LINE
URBAN STREET
SOME PAVEMENT HAD BEEN DAMAGED NEAR RAMP. THERE IS CONCRETE UNDER AREA
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
Org. Size: 11 x 17
Job No.: 38394784.20000
FIGURE D-1

Project Photographs

Site No. 915151
318 Urban Street
Buffalo, New York

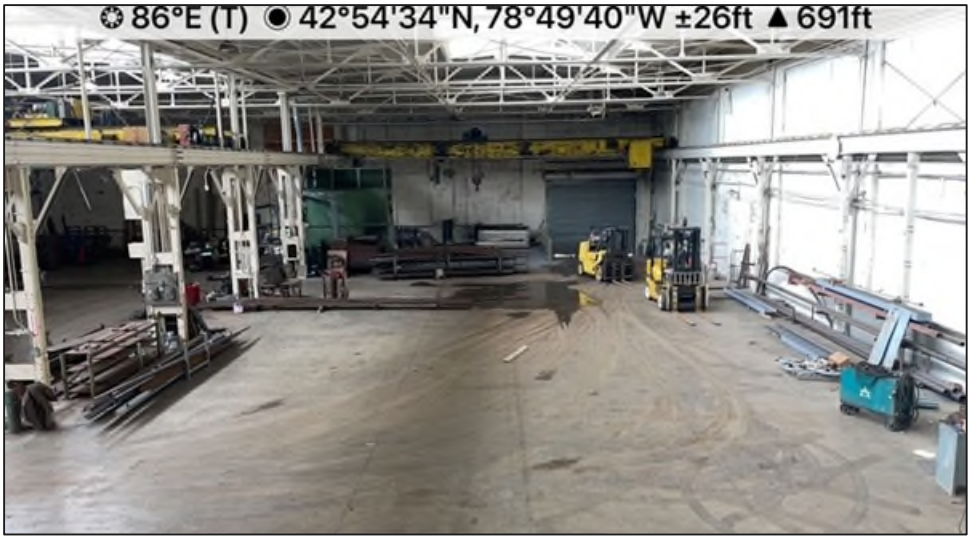


Photo: #1

Date:
June 16, 2025

Description:
View from mezzanine looking east towards loading ramp.

Photo: #2

Date:
June 16, 2025

Description:
View of building interior looking west.

Photo: #3

Date:
June 16, 2025

Description:
Loading ramp area.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #4

Date:
June 16, 2025

Description:
Area at bottom of ramp where pavement has deteriorated.

Photo: #5

Date:
June 16, 2025

Description:
North side of building.

Photo: #6

Date:
June 16, 2025

Description:
Fence along French St. Condition appears unchanged from 2024 inspection.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #7

Date:
June 16, 2025

Description:
North fence line; vegetation along fence line.

Photo: #8

Date:
June 16, 2025

Description:
North fence line; vegetation along fence line.

Photo: #9

Date:
June 16, 2025

Description:
West side of building; empty drums.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #10

Date:
June 16, 2025

Description:
West side lawn area; gravel pile.

Photo: #11

Date:
June 16, 2025

Description:
West side lawn area; empty drum.

Photo: #12

Date:
June 16, 2025

Description
West side of building; handicap access ramp.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #13

Date:
June 16, 2025

Description:
Fence along CSX railway; hole cut in fence.

Photo: #14

Date:
June 16, 2025

Description:
Parking area on east side of building; minor cracking in pavement observed.

Photo: #15

Date:
June 16, 2025

Description:
Site entrance; pavement deterioration observed.

Site No. 915151
318 Urban Street
Buffalo, New York

Photo: #16

Date:
June 16, 2025

Description:
South fence line where fence was repaired; fallen tree lying on fence.

Photo: #17

Date:
June 16, 2025

Description:
South side of building.

Photo: #18

Date:
June 16, 2025

Description:
Main entrance gate to property.

Appendix B

Certification Forms

7/15/2025

Lewis S. Streeter
Senior Project Manager
GE Corporate, OneEHS
1 River Road
Building 5 - 7W
Schenectady, NY 12345
Lewis.Streeter@ge.com

Re: Reminder Notice: Site Management Periodic Review Report and IC/EC Certification Submittal
Site Name: 318 Urban Street
Site No.: 915151
Site Address: 318 Urban Street
Buffalo, NY 14211

Dear Lewis S. Streeter:

This letter serves as a reminder that sites in active Site Management (SM) require the submittal of a periodic progress report. This report, referred to as the Periodic Review Report (PRR), must document the implementation of, and compliance with, site-specific SM requirements. Section 6.3(b) of DER-10 *Technical Guidance for Site Investigation and Remediation* (available online at http://www.dec.ny.gov/regulations/67386.html) provides guidance regarding the information that must be included in the PRR. Further, if the site is comprised of multiple parcels, then you as the Certifying Party must arrange to submit one PRR for all parcels that comprise the site. The PRR must be received by the Department no later than **September 29, 2025**. Guidance on the content of a PRR is enclosed.

Site Management is defined in regulation (6 NYCRR 375-1.2(at)) and in Chapter 6 of DER-10. Depending on when the remedial program for your site was completed, SM may be governed by multiple documents (e.g., Operation, Maintenance, and Monitoring Plan; Soil Management Plan) or one comprehensive Site Management Plan.

A Site Management Plan (SMP) may contain one or all of the following elements, as applicable to the site: a plan to maintain institutional controls and/or engineering controls ("IC/EC Plan"); a plan for monitoring the performance and effectiveness of the selected remedy ("Monitoring Plan"); and/or a plan for the operation and maintenance of the selected remedy ("O&M Plan"). Additionally, the technical requirements for SM are stated in the decision document (e.g., Record of Decision) and, in some cases, the legal agreement directing the remediation of the site (e.g., order on consent, voluntary agreement, etc.).

When you submit the PRR (by the due date above), include the enclosed forms documenting that all SM requirements are being met. The Institutional Controls (ICs) portion of the form (Box 6) must be signed by you or your designated representative. If you cannot certify that all SM requirements are being met, you must submit a Corrective Measures Work Plan that identifies the actions to be taken to restore compliance. The work plan must include a schedule to be approved by the Department. The Periodic Review process will not be considered complete until all necessary corrective measures are completed and all required controls are certified. Instructions for completing the certifications are enclosed.

All site-related documents and data, including the PRR, must be submitted in electronic format to the Department of Environmental Conservation. The required format for documents is an Adobe PDF file with optical character recognition and no password protection. Data must be submitted as an electronic data deliverable (EDD) according to the instructions on the following webpage:

https://www.dec.ny.gov/chemical/62440.html

Documents may be submitted to the project manager either through electronic mail or by using the Department's file transfer service at the following webpage:

https://fts.dec.state.ny.us/fts/

The Department will not approve the PRR unless all documents and data generated in support of the PRR have been submitted using the required formats and protocols.

You may contact Megan Kuczka, the Project Manager, at 716-842-2175 or megan.kuczka@dec.ny.gov with any questions or concerns about the site. Please notify the project manager before conducting inspections or field work. You may also write to the project manager at the following address:

New York State Department of Environmental Conservation
700 Delaware Ave
Buffalo, NY 14209-2202

Enclosures

PRR General Guidance
Certification Form Instructions
Certification Forms

ec: w/ enclosures

Pyramid Steel Corp. (Sweeney Steel Srvc) - msweeneysr@sweeneysteel

ec: w/ enclosures

Megan Kuczka, Project Manager

Andrea Caprio, Hazardous Waste Remediation Supervisor, Region 9

Arcadis of New York, Inc. - Doug Weeks - Doug.Weeks@arcadis.com

Enclosure 1

Certification Instructions

I. Verification of Site Details (Box 1 and Box 2):

Answer the three questions in the Verification of Site Details Section. The Owner and/or Qualified Environmental Professional (QEP) may include handwritten changes and/or other supporting documentation, as necessary.

II. Certification of Institutional Controls/ Engineering Controls (IC/ECs)(Boxes 3, 4, and 5)

1.1.1. Review the listed IC/ECs, confirming that all existing controls are listed, and that all existing controls are still applicable. If there is a control that is no longer applicable the Owner / Remedial Party should petition the Department separately to request approval to remove the control.

2. In Box 5, complete certifications for all Plan components, as applicable, by checking the corresponding checkbox.

3. If you cannot certify "YES" for each Control listed in Box 3 & Box 4, sign and date the form in Box 5. Attach supporting documentation that explains why the **Certification** cannot be rendered, as well as a plan of proposed corrective measures, and an associated schedule for completing the corrective measures. Note that this **Certification** form must be submitted even if an IC or EC cannot be certified; however, the certification process will not be considered complete until corrective action is completed.

If the Department concurs with the explanation, the proposed corrective measures, and the proposed schedule, a letter authorizing the implementation of those corrective measures will be issued by the Department's Project Manager. Once the corrective measures are complete, a new Periodic Review Report (with IC/EC Certification) must be submitted within 45 days to the Department. If the Department has any questions or concerns regarding the PRR and/or completion of the IC/EC Certification, the Project Manager will contact you.

III. IC/EC Certification by Signature (Box 6 and Box 7**):**

If you certified "YES" for each Control, please complete and sign the IC/EC Certifications page as follows:

- For the Institutional Controls on the use of the property, the certification statement in Box 6 shall be completed and may be made by the property owner or designated representative.

- For the Engineering Controls, the certification statement in Box 7 must be completed by a Professional Engineer or Qualified Environmental Professional, as noted on the form.

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: 2.468

Reporting Period: August 30, 2022 to August 30, 2025

	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? Industrial	X	☐
7. Are all ICs in place and functioning as designed?	X	☐

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. 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 Engineering Control 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
X	☐

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	☐

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 3180 Urban Street,
print name print business address

am certifying as Pyramid Steel (Owner or Remedial Party)

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

Michael W. Sweeney 9/23/25
Signature of Owner, Remedial Party, or Designated Representative Date
Rendering Certification

EC CERTIFICATIONS

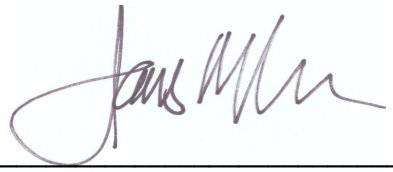
Box 7

Professional Engineer Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I James M. Nuss (print name) at Arcadis, 110 W. Fayette St., Ste. 300, Syracuse, NY 13202 (print business address),

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



9/25/25

Signature of Professional Engineer, for the Owner or Remedial Party, Rendering Certification | Stamp (Required for PE) | Date

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 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.

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