

April 6, 2020

Glenn May Project Manager New York State Department of Environmental Conservation 270 Michigan Ave Buffalo, NY 14203-2915.

Re: Site Management Periodic Review Report and IC/EC Certification

Site Name: Tract II Highland Ave

Site No.: C932136

Parcel Nos: 144.06-2-2.1; 144.06-2-25.1; 144.06-2-25.2; 144.06-2-27.1

Site Address: 3001 and 3079 Highland Ave/1300 and 1500 Beach Ave, Niagara Falls, NY 14305

Dear Mr. May:

On behalf of Brightfields II Corporation, Inventum Engineering, P.C. (Inventum) is submitting this periodic review report (PRR) for the Tract II Highland Ave Site (Site No. C932136). This report documents the implementation of, and compliance with, site-specific site management (SM) requirements for the reporting period of November 7, 2018 to March 7, 2020.

The forms for the site are enclosed documenting the SM requirements during the reporting period. The Institutional Controls (ICs) portion of the form (Box 6) have been signed by Inventum, the designated representative. The Engineering Controls (ECs) portion of the form (Box 7) have been signed by a Professional Engineer (PE).

The IC/EC Certification Forms are attached as Enclosure A. The PRR narrative is attached (Enclosure B) following applicable components of the format presented in the notification letter.

Respectfully submitted,

John P. Black, P.E.

President Enclosures

#### Enclosure A

Institutional and Engineering Controls Certification Form





Site No.

### Site Management Periodic Review Report Notice



Enclosure 2 NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION Institutional and Engineering Controls Certification Form **Site Details** Box 1 932136

Site Name Tract II Highland Ave Site Address: 3001 and 3079 Highland Ave/1300 and 1500 Beech Ave Zip Code: 14305 City/Town: Niagara Falis County Niagara Site Acreage: 19.251 Reporting Period: November 07, 2018 to March 07, 2020 YES NO 1. Is the information above correct? YES 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 NO tax map amendment during this Reporting Period? Has there been any change of use at the site during this Reporting Period NO (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? YES 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. 932136** 

Box 3

#### **Description of Institutional Controls**

**Parcel** 

Owner

144.06-2-2.1

**Brightfields II Corporation** 

Institutional Control

Ground Water Use Restriction Soil Management Plan Landuse Restriction Monitoring Plan Site Management Plan

IC/EC Plan

#### Easement restricting:

Park Area - Restricted Residential use
 East and West Commercial Areas - Commercial Use

2. groundwater use prohibited

3. Vegetable gardens and farming prohibited on the site

4. Engineering Controls must be inspected as described in the SMP

- 5. Data and information pertinent to the site management must be reported as described in the SMP
- 6. Future activities that will disturb remaining contaminated material in the East and West commercial areas must be conducted in accordance with the SMP

144.06-2-25.1

**Brightfields II Corporation** 

Ground Water Use Restriction Soil Management Plan Landuse Restriction Monitoring Plan Site Management Plan IC/EC Plan

#### Easement restricting:

Park Area - Restricted Residential use
 East and West Commercial Areas - Commercial Use

2. groundwater use prohibited

3. Vegetable gardens and farming prohibited on the site

4. Engineering Controls must be inspected as described in the SMP

- 5. Data and information pertinent to the site management must be reported as described in the SMP
- 6. Future activities that will disturb remaining contaminated material in the East and West commercial areas must be conducted in accordance with the SMP

144.06-2-25.2

Brightfields II Corporation

Ground Water Use Restriction
Soil Management Plan
Landuse Restriction
Monitoring Plan
Site Management Plan
IC/EC Plan

#### Easement restricting:

Park Area - Restricted Residential use
 East and West Commercial Areas - Commercial Use

2. groundwater use prohibited

- 3. Vegetable gardens and farming prohibited on the site
- 4. Engineering Controls must be inspected as described in the SMP
- 5. Data and information pertinent to the site management must be reported as described in the SMP
- 6. Future activities that will disturb remaining contaminated material in the East and West commercial areas must be conducted in accordance with the SMP

144.06-2-27.1

Brightfields II Corporation

Ground Water Use Restriction Landuse Restriction Soil Management Plan Site Management Plan Monitoring Plan IC/EC Plan Easement restricting:

- Park Area Restricted Residential use
   East and West Commercial Areas Commercial Use
- 2. groundwater use prohibited
- 3. Vegetable gardens and farming prohibited on the site
- 4. Engineering Controls must be inspected as described in the SMP
- 5. Data and information pertinent to the site management must be reported as described in the SMP
- 6. Future activities that will disturb remaining contaminated material in the East and West commercial areas must be conducted in accordance with the SMP

Box 4

#### **Description of Engineering Controls**

Parcel

**Engineering Control** 

144.06-2-2.1

Cover System

Soils in areas designated for commercial use, where contaminants remain that exceed the commercial use SCOs are covered with a demarcation layer and at least one foot of cover material that meets the Part 375 Import Fill criteria.

144.06-2-25.1

Cover System

Soils in areas designated for commercial use, where contaminants remain that exceed the commercial use SCOs are covered with a demarcation layer and at least one foot of cover material that meets the Part 375 Import Fill criteria.

144.06-2-27.1

Cover System

Soils in areas designated for commercial use, where contaminants remain that exceed the commercial use SCOs are covered with a demarcation layer and at least one foot of cover material that meets the Part 375 Import Fill criteria.

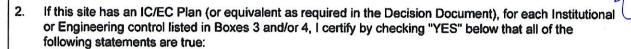
46
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#### Periodic Review Report (PRR) Certification Statements

<ol> <li>I certify by checking "YES" t</li> </ol>	olow	that
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- 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



- (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

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. 932136

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.

DOWN P. BCACRETIA	WERTUNETREINER	TRING.
print name	print business address . * Zo	Z Itoknoon, Va
am certifying as RENEDIAL	print business address # Zo	Remedial Party)
for the Site named in the Site Details Section of the Signature of Owner, Remedial Party, or Designate Rendering Certification	1/2/2	2020

#### **IC/EC CERTIFICATIONS**

Box 7

#### **Qualified Environmental Professional Signature**

I certify that all information in Boxes 4 and 5 a punishable as a Class "A" misdemeanor, purs	true. I understand that a false statement made herein is suant to Section 210.45 of the Penal Law.
Dorw J. Regenst	A 81 CARISLE DR. # ZER
print name	print business address

am certifying as a Qualified Environmental Professional for the

(Owner or Remedial Party)

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

Stamp 7 7 7 (Stamp PE)

Date

## Enclosure B Site Management Periodic Review Report





### Tract II Highland Ave Site Management Periodic Review Report

3001 and 3079 Highland Ave/1300 and 1500 Beech Ave NYSDEC Site Number C932136

Dates Covered by Report: November 7, 2018 to March 7, 2020

Dates Covered by Report: November 7, 2018 to March 7, 2020

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Dates Covered by Report: November 7, 2018 to March 7, 2020

#### 1 Executive Summary

Inventum Engineering, P.C. (Inventum) has prepared this Site Management (SM) Periodic Review Report (PRR) on behalf of Brightfields II Corporation (Brightfields) for the Tract II Site (Site) located at 3001 and 3079 Highland Ave/1300 and 1500 Beach Ave in the City of Niagara Falls, Niagara County, New York (NYSDEC Site No. C932136). The PRR covers the period November 7, 2018 to March 7, 2020. The following parcels are included within the Site Management Plan (SMP) and this PRR (Figure 1):

- Parcel 144.06-2-2.1 Eastern Commercial Area
- Parcel 144.06-2-25.1 Western Commercial Area
- Parcel 144.06-2-25.2 Park Area
- Parcel 144.06-2-27.1 Fifteen Foot Strip

Site Institutional Controls (ICs) and Engineering Controls (ECs) were adhered to over the PRR reporting period and continue to be effective in maintaining the remedial objectives. No changes to the established SMP or recommended during the next PRR reporting period.

#### 1.1 Site Summary

Honeywell International Inc. (Honeywell) entered into a Consent Order and Agreement (Order) with the NYSDEC in October 2011 to investigate and remediate the 19.25± acre Site. Honeywell (as a successor to Eltra Corporation), The City of Niagara Falls, Niagara Mohawk Power Corp. d/b/a National Grid, and R.R. Donnelley and Sons (RRD) (as the successor to Moore Business Forms) were identified a potentially responsible parts (PRPs) for the Site by NYSDEC. While offered the opportunity to do so, neither National Grid nor RRD participated in or supported the remediation of the Site.

Honeywell entered into an agreement with Brightfields whereby Brightfields acquired and remediated the Site as well as provided for the construction of a future public park and future commercial redevelopment. A summary of the remediation conducted on the each of the parcels included in the PRR is provided below. A full description of all Remedial Actions (RAs) conducted on the Site are included in the March 2018 Final Engineering Report (FER) prepared by Amec Foster Wheeler Environment & Infrastructure, Inc.

The Eastern Commercial Area (Parcel 144.06-2-2.1) encompasses approximately 11.067± acres and formerly contained the 17<sup>th</sup> Street Warehouse and the battery casings, anodes for graphite manufacturing, and lead-containing soil. The 17<sup>th</sup> Street Warehouse was demolished during the RA. Soils located in this parcel have been remediated by stabilization to meet the Toxicity Characteristic Leaching Procedure (TCLP) standard for lead of 5 milligrams per liter (mg/L) and consolidated into the northern portion of the parcel. The stabilized material was graded to within two (2) feet of the final grade and covered with material that met or exceeded the Commercial Use Soil Cleanup Objectives (SCOs) under 6 NYCRR Part 375 to within one (1) foot of the final grade. A demarcation barrier was installed at a depth of 1 foot below ground surface (bgs) and overlain with a minimum of one foot of cover material meeting either the Commercial Use SCO or the Allowable Constituent Levels for Imported Fill for Commercial Use under DER-10<sup>1</sup> (Commercial Imported Fill).

<sup>&</sup>lt;sup>1</sup> NYSDEC. May 2010. DER-10, Technical Guidance for Site Investigation and Remediation.

Dates Covered by Report: November 7, 2018 to March 7, 2020

The Western Commercial Area (Parcel 144.06-2-25.1) encompasses approximately  $1.813\pm$  acres and contained no structures. The parcel has been remediated to remove soils that exceeded the TCLP standard for lead. Soils remain that exceed the Commercial Use SCO on the parcel. These soils are capped by a demarcation layer, a minimum of six inches of on-Site fill meeting the Commercial Use SCO or Commercial Imported Fill limits, and at least six inches of topsoil or gravel cover.

The Park Area (Parcel 144.06-2-25.2) encompasses approximately 5.001± acres and formerly contained a vacant lot, an underground parking structure, and a surface parking lot which were demolished circa 1980. The foundation and ground level floor of another structure (Moore Basement Structure) on the parcel was demolished between September 2012 and October 2013 as part of the RA. This parcel has been remediated to Restricted-Residential Use SCOs and backfilled with soil meeting the Allowable Constituent Level for Imported Fill for Restricted Residential Use under DER-10. The area was graded to specifications agreed to between Brightfields and the City of Niagara Falls.

The Fifteen Foot Strip (Parcel 144.06-2-27.1) is approximately 15-feet wide (north and south) and 875-feet long (east to west). The parcel contains no structures and is grass covered. The eastern portion (approximately 737 feet) has been remediated to Restricted-Residential Use SCOs and the western portion (approximately 138 feet) has been remediate to Commercial Use SCOs with the placement of a 1-foot soil cover above an orange demarcation fabric. Ownership of the Fifteen Foot Strip was transferred to the adjoining property (Tract 1; Brownfield Cleanup Program Site No. C932157) in April 2016 to facilitate commercial development of that property; however, the environmental easements associated with this parcel are referenced to the Tract II SMP and included within the scope of this PRR.

#### 1.2 Effectiveness of the Remedial Program

A FER for the Site was issued in March 2018. The Western Commercial Area, Eastern Commercial Area, and Fifteen Foot Strip have environmental easements restricting them to commercial or industrial use and limiting excavation to depths less than one foot or within established utility corridors. The Park Area has an environmental easement for restricted-residential use, which allows recreational, commercial, and industrial use with specific prohibitions for activities such as single-family dwellings, raising livestock for human consumption or growing vegetables for human consumption.

The SMP details activities that will be undertaken until the Environmental Easements are extinguished in accordance with ECL Article 71, Title 36 and includes, in summary:

- Site-wide inspections will be performed annually. Modification to the frequency or duration of the inspections will require approval from the NYSDEC.
- Site-wide inspections will be performed after all severe weather-conditions that may affected ECs or monitoring devices.
- Sitewide inspections will be documented through completion of an inspection form.
- Preparation of a PRR on an annual basis or as otherwise determined by the NYSDEC.

Dates Covered by Report: November 7, 2018 to March 7, 2020

#### 1.2.1 Progress During the Reporting Period

The cover system is intact and functioning. Annual inspections were completed in accordance with the SMP.

#### 1.2.2 Progress to Remedial Objectives for the Site

The Remedial Action Objectives (RAOs) for the Site as established in the March 2003 Record of Decision (ROD) are summarized below and have been met through implementation of the remedial program and continued compliance with the SMP.

- Prevent ingestion/direct contact with soil above the SCOs
- Prevent inhalation of, or exposure to, contaminants volatizing from soil above the SCOs
- Reduce or control, to the extent practicable, the constituents present in the soil at concentrations exceeding the SCOs applicable to the intended use of the property parcels.
- Stabilize soils to mee the TCLP Standard.
- Provide for attainment of the applicable SCOs for soil, to the extent practicable.
- Prevent migration of contaminants that would result in groundwater or surface water contamination.

#### 1.3 Compliance

#### 1.3.1 Potential Non-compliance

There were no potential areas of non-compliance identified during the PRR reporting period.

#### 1.3.2 Proposed Steps

Not applicable.

#### 1.4 Recommendations

#### 1.4.1 Recommended Changes to the SMP

There are no recommended changes to the SMP at this time.

#### 1.4.2 Recommend Changes to the Frequency for Submittal of PRRs

There is no recommended change to the frequency of the PRRs at this time.

### 1.4.3 Recommend Whether the Requirements for Discontinuing Site Management It is appropriate to continue Site Management.

#### 2 Site Overview

#### 2.1 Site Location

The portion of the Site subject to the PRR is located in Niagara Falls, Niagara County, New York and is identified on the Niagara County Tax Map as Section 144.06, Block 2, Lots 2.1 (Western Commercial Area), 25.1 (Park Area), 25.2 (Eastern Commercial Area), and 27.1 (Fifteen Foot Strip). Also included within the limits of the Site, but not included in the PRR, is the parcel identified as Section 130.18, Block 2, Lot 13 (15<sup>th</sup> Street Alignment) which is owned by National Grid.

Dates Covered by Report: November 7, 2018 to March 7, 2020

The Site consists of approximately 19.251 acres located north of Beech Avenue, between Highland Avenue and a residential area on 17<sup>th</sup> Street (Figure 1). The Site extends north to the former Power City Warehouse (a.k.a Tract I; Parcel No. 144.06-2-27.1) property. Historically, the Site included a dilapidated building known as the "17<sup>th</sup> Street Warehouse" that was located along the northern property boundary with the former Union Carbide plant (Parcel 130.19-1-2.1) and the remnants of a former Moore building known as the "Moore Basement Structure" (or Moore Parking Structure) located adjacent to Beech Ave.

#### 2.2 Chronology of the Remedial Program

Remediation has been completed in accordance with the August 2012 Tract II Remedial Design Work Plan prepared by Amec Foster Wheeler. The remedial approach was to remove soil and fill material containing lead concentrations exceeding the TCLP standard, stabilize with Portland cement, and consolidate the stabilized soil in the northern portion of the Eastern Commercial Area. Soils that exceeded the Commercial Use SCOs in the Western Commercial Are were excavated to a depth of one foot below the final grade for the area of disposed of off-Site. Those soils remaining in the Western Commercial Area that exceeded the SCOs but met the TCLP standard were graded to ensure they were one or more feet below the final grade before being covered with a demarcation layer.

Soils that exceeded the Restricted-Residential Use SCOs anywhere in the soil column in the Park Area were excavated and used as cover for the treated soil in the Eastern Commercial Area. Untreated soil that exceeded only the Commercial Use SCO that was either placed or left in place in the Eastern Commercial Area was graded to within one foot of the final grade prior to placing a demarcation layer on the surface.

Once all the areas met the applicable SCOs or were demarcated, they were backfilled to within 6 inches of the final grade with soil meeting either the Commercial Use SCOs (if derived on-Site) or the Allowable Constituent Levels for Imported Fill (if derived off-Site). The final 6 inches of cover material to meet the final grade is composed of either gravel, topsoil, or both.

The above-described remedial activities are more fully documented in the March 2018 Final Engineering Report (Amec Foster Wheeler, March 2018).

Dates Covered by Report: November 7, 2018 to March 7, 2020

#### 3 Evaluate Remedy Performance, Effectiveness, and Protectiveness

The performance, effectiveness, and protectiveness of the remedy are verified through evaluating each of the primary remedial measures.

- The prevention of ingestion/direct contact with soil above the SCOs and the prevention of inhalation of, or exposure to, contaminants volatizing from soil above the SCOs is mitigated through maintenance of the Site cover system and adherence to the recorded environmental easements.
- Annual Site-wide inspection reporting indicates that the compliance to the Site ECs, established
  by the environmental easements, were maintained during the PRR reporting period. An
  Inspection Form for the reporting period is provided in Appendix A.
- The Site-wide inspection report (Appendix A) indicate that the soil cover was intact, and the remedy remained protective for ingestion, direct-contact, and inhalation of soils above applicable SCOs.

### 4 IC/EC Plan Compliance Report

#### 4.1 IC/EC Requirements and Compliance

A series of IC have been developed and are being adhered to by the Site environmental easement. These ICs are designed to:

- Limit the use and development of the Site to Restricted-Residential (Park Area) and Commercial (remainder of Site) use;
- Implement, maintain, and monitor engineering control systems;
- Prohibit groundwater use;
- Implement a SM reporting system in a frequency and manner defined in the SMP;
- Provide access to the Site for agents, employees, or other representatives of the State of New York; and
- Prohibit vegetable gardens and farming.

#### 4.1.1 Controls

Engineering controls (ECs) developed for the Site consist of an engineered cover system placed over the Western and Eastern Commercial Areas of the Site. This cover system is comprised of a demarcation layer, a clean soil cover that is a minimum of one foot thick, and vegetation or gravel to ensure stabilization of the cover system.

#### 4.1.2 Status

The Site IC/ECs are all currently active and in force.

#### 4.1.3 Corrective Measures

There are no corrective measures proposed at this time.

Dates Covered by Report: November 7, 2018 to March 7, 2020

#### 4.2 IC/EC Certification

The IC/EC certifications are provided in Enclosure A.

#### 5 Monitoring Plan Compliance Report

#### 5.1 Monitoring Plan Compliance Report

Routine Site Monitoring includes annual Site-wide inspection and periodic certification.

#### 5.2 Monitoring Completed During Reporting Period

An annual Site-inspection was conducted on November 1, 2019. There were no emergencies or unforeseen failures of established ECs that would require non-routine inspections.

#### 5.3 Components of the Monitoring Plan

The Site-wide inspection (Appendix A) documents that:

- ECs continue to perform as deigned;
- ECs continue to be protective of human health and the environment;
- Compliance with requirements of the SMP and the Environmental Easement were maintained over the PRR reporting period;
- Remedial performance criteria continue to be achieved; and
- Site records are complete and up to date.

#### 5.4 Monitoring Deficiencies

There were no monitoring deficiencies during the reporting period.

#### 5.5 Conclusions and Recommendations for Changes

No changes to the monitoring program are recommended.

#### 6 Operation & Maintenance (O&M) Plan Compliance Report

The Site remedy does not rely on any mechanical systems to protect public health and the environment; therefore, an O&M Plan Compliance Report is not applicable to this PRR.

#### 7 Overall PRR Conclusions and Recommendations

Site IC/ECs remain in place and effective in maintaining the remedial objectives. No changes to the established SMP or recommended during the next PRR reporting period.

Tract II Highland Ave Site Management Periodic Review Report 3001 and 3079 Highland Ave/1300 and 1500 Beach Ave NYSDEC Site Number C932136

Dates Covered by Report: November 7, 2018 to March 7, 2020

### Figures



Dates Covered by Report: November 7, 2018 to March 7, 2020

Appendix A – Engineering Controls – Annual Site-Wide Inspection Form

#### Site Inspection Form

Site Name	e: Brightfields II -	Tract II	Weather: <u>Cool, Cloudy</u>
Project N	umber: <u>12028</u>		Assessment By: John Yensan
Date: Nov	vember 1, 2019		
<u>Yes</u>	<u>No</u>	<u>N/A</u>	A Cita Llaa
		₩ □ □	<ul> <li>A. Site Use</li> <li>1. Evidence for Change in Property Usage?</li> <li>2. Evidence of Groundwater Use?</li> <li>3. Evidence of vegetable gardening/farming?</li> <li>2. Day Care or Other Non-Permitted Use Present?</li> <li>3. Evidence of Excavation?</li> <li>4. Proper Notification for Excavation Made?</li> <li>5. CAMP and/or HASP Revised for Excavation</li> </ul>
	X X		<ul><li>B. Security</li><li>1. Signs of Trespassers/Vandalism?</li><li>2. Other</li></ul>
			<ul><li>C. General Site Conditions</li><li>1. Vegetation Stress?</li><li>2. Mowing Required?</li><li>3. Access Road Drivable?</li><li>4. Odors?</li><li>5. Other</li></ul>
	Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y		<ul> <li>D. Soil Inspection</li> <li>1. Exposed Waste?</li> <li>2. Side Slope Stable?</li> <li>3. Erosion?</li> <li>4. Leachate Seeps (Discolored Vegetation)?</li> <li>5. Bare Spots?</li> <li>6. Presence of Burrowing Animals?</li> <li>7. Deep Rooted Vegetation?</li> <li>8. Cracking?</li> <li>9. Other</li> </ul>
			<ul> <li>E. Surface Water</li> <li>1. Obstruction of Flow Ditches?</li> <li>2. Erosion of Ditches?</li> <li>3. Silt &amp; Erosion Control?</li> <li>4. Culverts in Good Condition?</li> <li>5. Evidence of Overflow or Uncontrollable Flow?</li> <li>6. Outfalls in Good Condition?</li> <li>7. Other</li> </ul>

Green Remediation Implementation:	
Energy Usage: N/A	
Solid Waste Generation: Dumpster on site for collection and disposal of refuse blown onto	
property from adjacent public ROW's and residential properties.	
Transportation and Shipping: N/A	
Water Usage: N/A	
Other Comments: None.	