

Ms. Veronica Kreutzer
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Buffalo, NY 14209-2202

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Buffalo, NY 14202
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Date: April 26, 2024

Our Ref: 30222114

Subject: BCP Site #B00164: BUDC – Hanna Furnace Sub-Parcel 3
Site Management 2024 Periodic Review Report and IC/EC Certification

Dear Ms. Kreutzer,

Please find enclosed the electronic submittal of the 2024 Periodic Review Report and IC/EC Certification for the Buffalo Urban Development Corporation (BUDC) Hanna Furnace Sub-Parcel 3 (#B00164) Brownfield Cleanup Program Site in Buffalo, New York. The Periodic Review Report has been prepared in accordance with the DER-10 *Technical Guidance for Site Investigation and Remediation* and the Site Management Plan (Arcadis, 2022).

Please do not hesitate to contact Rebecca Gandour, Executive Vice President at BUDC, at (716) 362-8378 or me at (315) 671-9545 if you have any questions.

Sincerely,
Arcadis U.S., Inc.



Michael Higgins, PE
Principal Engineer

Email: Michael.Higgins@arcadis.com
Direct Line: 315.671.9545

CC. Rebecca Gandour, BUDC
Andrei Romei, Arcadis
Luke Goetz, Arcadis

Enclosures:
2024 Periodic Review Report

Buffalo Urban Development Corp.

Periodic Review Report

Hanna Furnace Subparcel 3

Buffalo, New York

BCP Site #B00164

April 2024

Periodic Review Report

Hanna Furnace Subparcel 3

April 2024

Prepared By:

Arcadis of New York, Inc.
50 Fountain Plaza, Suite 360
Buffalo, NY 14202
United States
Phone: 716 667 0900

Prepared For:

Rebecca Gandour
Executive Vice President
Buffalo Urban Development Corp.
95 Perry Street, Suite 404
Buffalo, New York 14203

Our Ref:

30222114



Michael Higgins, PE
Principal Engineer

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Executive Summary

Arcadis of New York, Inc. (Arcadis) has prepared this Periodic Review Report (PRR) for the Hanna Furnace Sub-Parcel 3 (Site) Development as a requirement of the New York State Department of Environmental Conservation (NYSDEC). The Site is part of the Union Ship Canal Public Open Space known as Buffalo Lakeside Commerce Park (BLCP) in Buffalo, New York. The site was remediated in accordance with State Assistance Contract (SAC) # C3-03-218, Site # B00164, which was executed on February 17, 2005, and last amended on December 8, 2010.

The City of Buffalo and County of Erie entered a SAC with the NYSDEC to remediate the site and required the Remedial Party, to investigate and remediate contaminated media at the site. The site Investigation (SI) determined that elevated levels of Semi Volatile Organic Compounds (SVOCs) are present in the site's soils. Those elevated levels were above the concentrations allowed for commercial use as established in the Explanation of Significant Difference (February 2017), prepared by the NYSDEC, for passive recreational areas. The groundwater beneath the site has elevated pH levels and dissolved metals with the primary dissolved metal being sodium and isolated cases of iron, antimony, arsenic, lead, magnesium, and manganese. SVOCs consisting primarily of phenols were also found in the groundwater. The canal sediments had levels of SVOCs (primarily carcinogenic polyaromatic hydrocarbons [cPAHs]), several metals, and polychlorinated biphenyls (PCBs).

The site contains contamination left after completion of the remedial action. Engineering controls (ECs) and institutional controls (ICs) have been incorporated into the site remedy to control exposure to remaining contamination during the use of the site to promote protection of public health and the environment. An Environmental Easement granted to the NYSDEC, and recorded with the Erie County Clerk requires compliance Site Management Plan (SMP) (March 2022) and all ECs and ICs placed on the site. The ICs place restrictions on site use, and mandate operation, maintenance, monitoring and reporting measures for all ECs and ICs. This PRR was developed in accordance with SMP requirements to ensure that all site ECs and ICs remain in compliance.

The cover system inspection indicates that the various cover system components are in-place and functioning as intended. A few areas of the existing soil cover system require minor action to prevent the functionality and effectiveness of the cover system from being compromised over time. As provided in the SMP, the site owner is obligated to comply with the Excavation Work Plan, Site Use Restrictions, Groundwater Use Restrictions, Sitewide Inspections, and the Environmental Easement.

1 Site Overview

1.1 Site Location and Description

The site is located in the City of Buffalo, County of Erie, New York and is identified as Parcel Number 3 in Lot 18 in the Ogden Gore Track, Township Number 10, Range Number 8. The site is an approximately 22-acre area bounded by vacant property of Parcel 4 of the Buffalo Lakeside Commerce Park to the north, Ship Canal Parkway to the south and east, and Commerce Drive and Fuhrmann Boulevard to the west. The site is located in the middle of the Buffalo Lakeside Commerce Park (BLCP). Site location and boundaries are provided on Figures 1 and 2.

1.2 Summary of Remedial Actions

The site was remediated in general accordance with the NYSDEC-approved Record of Decision (ROD) dated February 2005, with the exception of the reduced requirement for a one-foot minimum clean cover placement. At the time that the ROD was issued, the 6 NYCRR Part 375 regulations did not distinguish between active and passive recreational site uses. Regulations now allow that 12 inches of clean soil cover is protective for passive recreational sites. Given the passive recreational use of the site, the remedy outlined in the ROD was modified to a soil cover system consisting of a 1-foot minimum thickness to prevent human exposure to remaining contaminated soil/fill at the site as detailed in the *Explanation of Significant Difference* (February 2017) prepared by the NYSDEC.

The following is a summary of the Remedial Actions performed at the site:

1. Excavation of soil/fill exceeding Site-Specific Action Levels.
2. Construction and maintenance of a soil cover system consisting of one foot of clean soil on site to prevent human exposure to remaining contaminated soil/fill remaining at the site. A one-foot stone aggregate cover was also placed over the sediment within the canal to prevent direct contact to contaminated canal sediments.
3. Execution and recording of an Environmental Easement to restrict land use and prevent future exposure to contamination remaining at the site.
4. Development and implementation of a SMP for long term management of remaining contamination as required by the Environmental Easement, which includes plans for: (1) Institutional Controls (IC) and Engineering Controls (EC), (2) inspections and maintenance and (3) periodic reporting.

Remedial activities were completed at the site in September 2011. After completion of the remedial activities described in the Remedial Work Plan, some contamination was left in the subsurface at this site.

In 2016, site cover system thickness evaluations were conducted in accordance with the Work Plan dated August 2, 2016. The soil cap was observed throughout the site at depths ranging from 11 to 32 inches below ground surface (estimated cap thickness of 11 to 14 inches) and an orange demarcation fabric was also observed throughout the site below the cap material in 39 of the 44 soil borings.

A SMP was prepared and submitted to NYSDEC in April 2022 to manage remaining contamination at the site until the Environmental Easement is extinguished in accordance with ECL Article 71, Title 36.

2 Remedy Performance

This is the first annual PRR inspection since development and execution of the SMP in 2022. Site inspection activities consist of a visual site walk-through to observe and photograph the integrity of the cover systems including sloughing, cracks, settlement, erosion, distressed vegetation, and damage to the cover system.

Site inspection activities were conducted on April 12, 2024, following a heavy rain event of approximately 1-2 inches. Inspection activities indicate that the various cover system components, including soil cover and asphalt, are functioning as intended. Some minor vehicle rutting was observed adjacent to the south parking areas as well as some minor ponding/water accumulation along the edges of the site parcel. Additional details of these deficiencies can be found in Section 3.5; and the inspection and certification forms are included in Appendices A and B. Inspection photographs are included as Appendix C and Figure 3.

3 IC/EC Plan Compliance Report

Institutional Controls and Engineering Controls (IC/EC) currently enacted at the site include the following, as described in the SMP:

- Soil Cover Systems
- Excavation Work Plan
- Site Use Restrictions
- Groundwater Use Restrictions

3.1 Soil Cover Systems

Exposure to remaining contamination in soil/fill at the site is prevented by a soil cover system placed over the site. This cover system is comprised of a minimum of 12 inches of clean soil, asphalt pavement, concrete-covered sidewalks, and concrete building slabs. There is an orange mesh demarcation material between the clean cover and the remaining contaminated soil. The Excavation Work Plan (EWP) that is attached as Appendix B to the SMP outlines the procedures required to be implemented in the event the cover system is breached, penetrated, or temporarily removed, and any underlying remaining contamination is disturbed.

3.2 Excavation Work Plan

The site has been remediated for commercial use. Any future intrusive work that will penetrate the soil cover or cap, or encounter or disturb the remaining contamination, including any modifications or repairs to the existing cover system will be performed in compliance with the EWP that is attached as Appendix B to the SMP. Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP) prepared for the site.

3.3 Site Use Restrictions

The use of the site is limited to park space provided that long-term ECs and ICs are employed. Under Part 375 regulations, "commercial use" includes passive recreational areas (i.e., parks) without areas such as playgrounds and athletic fields. The property cannot be used for a higher level of use such as residential without additional remediation and amendment of the Environmental Easement. Activities that will disturb the remaining contaminated material on the property must be conducted in accordance with the SMP. No vegetable gardens or farming is permitted on the property.

3.4 Groundwater Use Restrictions

Use of the groundwater on site is prohibited without treatment rendering it safe for the intended use.

3.5 Institutional Controls/Engineering Controls Conclusions and Recommendations

Site-wide inspections will be performed on a regular schedule at a minimum of once a year. Site-wide inspections will also be performed after severe weather conditions that may affect ECs. During these inspections, an inspection form will be completed. The form will compile sufficient information to assess the following:

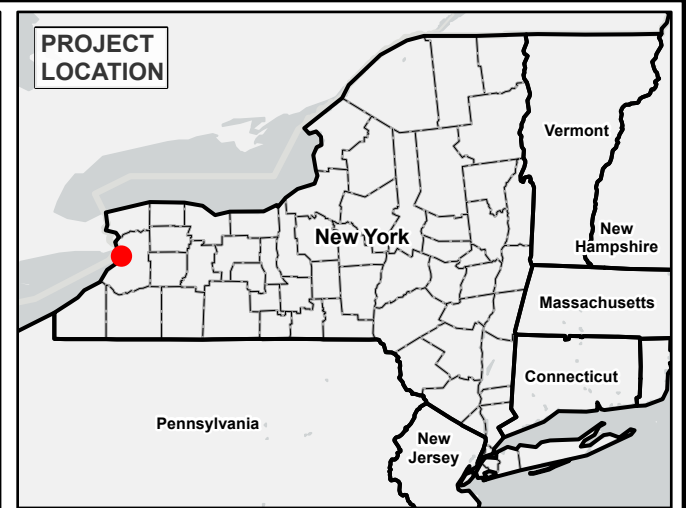
- Compliance with all ICs, including site usage.
- An evaluation of the condition and continued effectiveness of the site cover system and canal walls.
- General site conditions at the time of the inspection.

All IC/ECs for the site have been implemented in accordance with the DEC-approved SMP and Environmental Easement. The sitewide inspection was conducted after a weather event resulting in approximately 1-2 inches of rainfall in the 24 hours previous to inspection. A summary of the observational findings from the most recent site inspection are provided below with references to the respective photos of the findings which can be found in Appendix C:

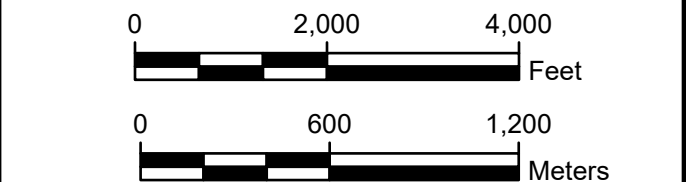
- Some minor ponding due to the recent rainfall was noted in gravel pathways installed in the northern portion of the site and in soil along the southern and northern site boundaries (see Photographs 18 and 28). Future observations or inspections under dry conditions should be noted to assess the degree of surface water accumulation.
- Minor rutting was observed in soil adjacent to the south parking area (see Photographs 10, 15, and 17) as a result of unauthorized vehicular traffic and/or site maintenance. It is recommended that areas be filled and re-seeded with NYSDEC-approved materials as part of general site maintenance to prevent long-term deterioration of the cover systems.
- Evidence of historical deterioration and pitting along the top of the canal wall was observed on the north side of the canal due to the age of the wall. No indications of canal wall settling, cracking, or deflection were observed during visual inspections (see Photographs 29 and 30). Additional attention should be applied to this area during future annual inspections to track any excessive deterioration.

Figures

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LEGEND:
 Site Location



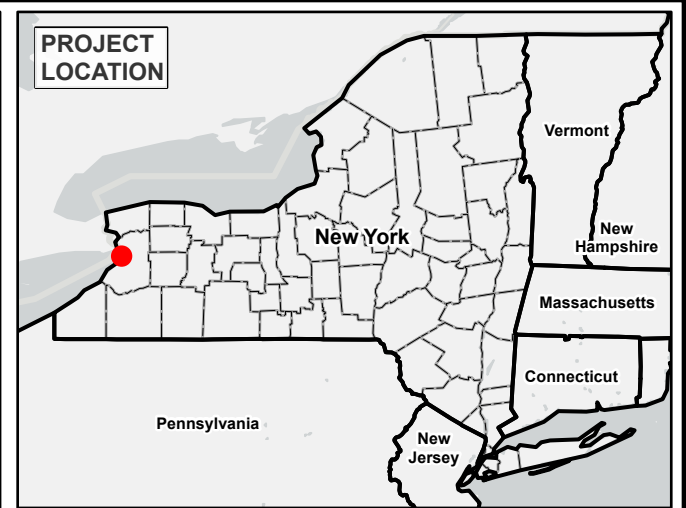
NOTE:
 1. USGS 7.5' TOPOGRAPHIC QUADRANGLE BUFFALO SE (1968) AND BUFFALO SE OE W (1965), NEW YORK.
 2. ESRI LIGHT GRAY REFERENCE MAP (INSET).
 OBTAINED FROM ESRI IMAGE SERVICE.

HANNA FURNACE SUBPARCEL 3
 BUFFALO, NEW YORK
 PERIODIC REVIEW REPORT

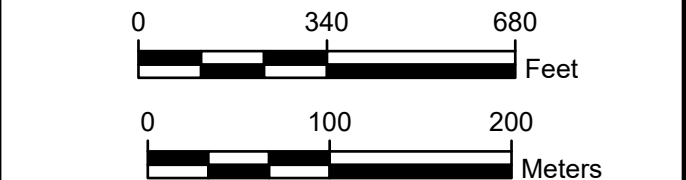
SITE LOCATION MAP

FIGURE
1

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- LEGEND:**
- Site Location
 - Hanna Furnace Parcels
 - New York State Tax Parcels



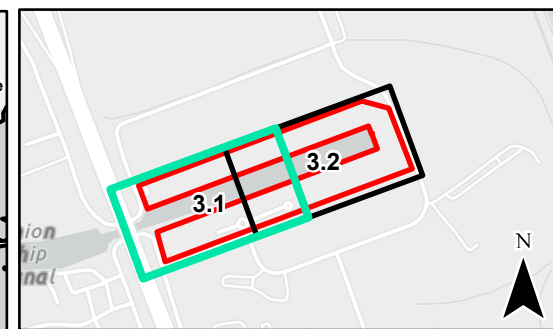
NOTE:
1. ESRI WORLD IMAGERY (2022)
2. ESRI LIGHT GRAY REFERENCE MAP (INSET).
OBTAINED FROM ESRI IMAGE SERVICE.

HANNA FURNACE SUBPARCEL 3
BUFFALO, NEW YORK
PERIODIC REVIEW REPORT

PARCEL MAP

  **FIGURE 2**

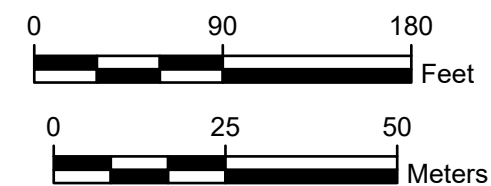
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LEGEND:

- ↑ Photo Location
- Site Location

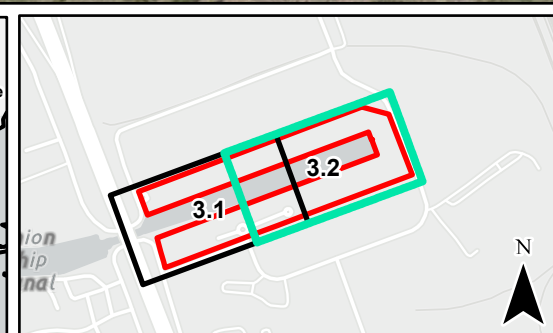
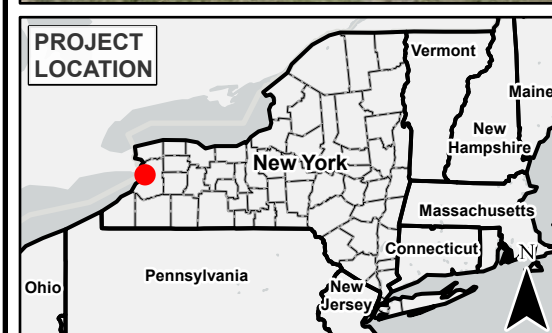
NOTE:
1. ESRI WORLD IMAGERY (2022)
2. ESRI LIGHT GRAY REFERENCE MAP (INSET).
OBTAINED FROM ESRI IMAGE SERVICE.



HANNA FURNACE SUBPARCEL 3
BUFFALO, NEW YORK
PERIODIC REVIEW REPORT

PHOTO LOCATION MAP

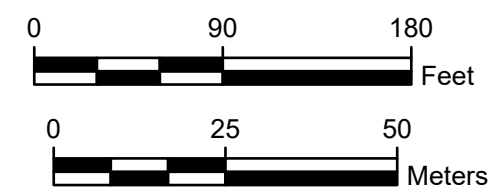
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LEGEND:

- ↑ Photo Location
- Site Location

NOTE:
1. ESRI WORLD IMAGERY (2022)
2. ESRI LIGHT GRAY REFERENCE MAP (INSET).
OBTAINED FROM ESRI IMAGE SERVICE.



HANNA FURNACE SUBPARCEL 3
BUFFALO, NEW YORK
PERIODIC REVIEW REPORT

PHOTO LOCATION MAP



FIGURE 3.2

Appendix A

Environmental Inspection Form

ENVIRONMENTAL INSPECTION FORM

Site Name: Hanna Furnace Sub-Parcel 3 **Site Number:** B00164

Inspection Date: 4/12/24

Property Address: Two Ship Canal Parkway

Site Owner: Buffalo Urban Development Corporation

Property ID: (Tax Assessment Map) Section-Block-Lot Nos: 132.19-1-4.11

Total Site Acreage: 21.2 acres

Weather during inspection: 40-degree F, cloudy, windy, rain

SIGNATURE

The findings of this inspection were discussed with appropriate personnel, corrective actions were identified and implementation was mutually agreed upon:

Inspectors Signature: L. Goetz **Date:** 4/12/24

Next Scheduled Inspection: Spring 2025

<u>Illegal Dumping</u>	Yes	No
	<u> </u>	<u> X </u>
1. Is there evidence of illegal dumping?	<u> </u>	<u> X </u>

COVER & VEGETATION

	Yes	No
2. Final cover in acceptable condition?	<u> X </u>	<u> </u>
Is there evidence of sloughing, <u>erosion</u> , ponding or settlement?	<u> X¹ </u>	<u> </u>
Is there evidence of <u>unintended traffic</u> ; rutting?	<u> X² </u>	<u> </u>
Is there evidence of distressed vegetation/turf?	<u> </u>	<u> X </u>
3. Final cover sufficiently covers soil/fill material?	<u> X </u>	<u> </u>
Are there cracks visible in the soil or pavement?	<u> </u>	<u> X </u>
Is there evidence of erosion in the stormwater channels or swales?	<u> X </u>	<u> </u>

CANAL WALL

	Yes	No
4. Canal wall in acceptable condition?	<u>X</u>	<u> </u>
Is there evidence of excess pitting, <u>erosion</u> or settlement?	<u> </u>	<u>X</u>
Are there tension cracks visible in the concrete?	<u> </u>	<u>X</u>
Canal wall or parts of wall are visually out of plumb, tilting or deflecting?	<u> </u>	<u>X</u>
Other signs of damage or deterioration?	<u> </u>	<u>X</u>

Describe:

Displacement of canal wall mark from prior inspection? NA in.

ACTIVITY ON SITE

	Yes	No
5. Any activity on site that mechanically disturbed soil cover?	<u> </u>	<u>X</u>

ADDITIONAL FACILITY INFORMATION

Development on or near the site? (Specify size and type: e.g., residential, 40 acres, well and septic)

COMMENTS

- (1) The sitewide inspection was conducted after a weather event resulting in approximately 1 to 2 inches of rainfall in the 24 hours previous to inspection. Some minor ponding was observed in gravel pathways installed in the northern portion of the site and in soil along the southern and northern site (Photographs, 18 and 28).
- (2) Minor rutting was observed in soil adjacent to public parking lot as result of unauthorized vehicular traffic and/or site maintenance (Photographs 10, 15, and 17)

- (3) Evidence of historical deterioration and pitting along the top of the canal wall was observed on the north side of the canal due to the age of the wall. No indications of canal wall settling, cracking, or deflection were observed during visual inspections (see Photographs 29 and 30). Additional attention should be applied to this area during future annual inspections to track any excessive deterioration.

ATTACHMENTS

Appendix B

Institutional and Engineering Controls Certification Form



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



Site Details

Box 1

Site No. **B00164**

Site Name **Hanna Furnace Sub-Parcel 3**

Site Address: 2 Ship Canal Parkway Zip Code: 14203

City/Town: Buffalo (C)

County: Erie

Site Acreage: 21.771

Reporting Period: November 28, 2022 to March 28, 2024

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 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

Description of Institutional ControlsParcelOwnerInstitutional Control**Portion of 132.19-1-4.11**

City of Buffalo

Soil Management Plan
IC/EC PlanGround Water Use Restriction
Landuse Restriction
Site Management Plan
Monitoring PlanProhibition against use of groundwater without treatment;
Compliance with a soils management plan; and
Use must be maintained as commercial (passive recreation).**Description of Engineering Controls**ParcelEngineering Control**Portion of 132.19-1-4.11**

Cover System

Site-wide cover system of soil (minimum 1 foot thick) and asphalt pavement.

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 complete.

YES NO

☐☐

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

☐☐

**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. B00164

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 Rebecca Gandour at 95 Perry St, Ste 404 Buffalo, NY 14203
print name print business address

am certifying as Buffalo Urban Development Corporation (Owner or Remedial Party)

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

Rebecca Gandour
Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

4/26/24
Date

EC CERTIFICATIONS

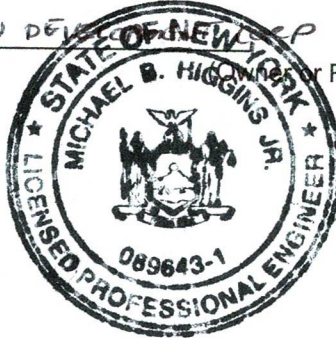
Box 7

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 MICHAEL HIGGINS at BUFFALO, NEW YORK
print name print business address

am certifying as a for the BUFFALO URBAN DEVELOPMENT CORP (Owner or Remedial Party)



Michael Higgins
Signature of , for the Owner or Remedial Party,
Rendering Certification

Stamp
(Required for PE)

4/26/24
Date

Appendix C

Photograph Log



PHOTOGRAPH LOG

Hanna Furnace Sub-Parcel 3
2024 Periodic Review Report
Buffalo, New York

	<p>Photograph: 1</p> <p>Description: Soil cover</p> <p>Direction of photo: East</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 2</p> <p>Description: Soil cover and asphalt</p> <p>Direction of photo: West</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>

PHOTOGRAPH LOG

Hanna Furnace Sub-Parcel 3
2024 Periodic Review Report
Buffalo, New York

	<p>Photograph: 3</p> <p>Description: Soil cover and asphalt</p> <p>Direction of photo: Northwest</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 4</p> <p>Description: Soil cover and vegetation</p> <p>Direction of photo: North</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>

PHOTOGRAPH LOG

Hanna Furnace Sub-Parcel 3
2024 Periodic Review Report
Buffalo, New York

	<p>Photograph: 5</p> <p>Description: Soil cover and asphalt</p> <p>Direction of photo: East</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 6</p> <p>Description: Soil cover and asphalt</p> <p>Direction of photo: West</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>

PHOTOGRAPH LOG

Hanna Furnace Sub-Parcel 3
2024 Periodic Review Report
Buffalo, New York

	<p>Photograph: 7</p> <p>Description: Soil cover and asphalt</p> <p>Direction of photo: North</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 8</p> <p>Description: Soil cover, vegetation, and asphalt</p> <p>Direction of photo: Southeast</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>

PHOTOGRAPH LOG

Hanna Furnace Sub-Parcel 3
2024 Periodic Review Report
Buffalo, New York

	<p>Photograph: 9</p> <p>Description: Soil cover, vegetation, and asphalt</p> <p>Direction of photo: Southeast</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 10</p> <p>Description: Soil cover and asphalt</p> <p>Direction of photo: West</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>

PHOTOGRAPH LOG

Hanna Furnace Sub-Parcel 3
2024 Periodic Review Report
Buffalo, New York

	<p>Photograph: 11</p> <p>Description: Soil cover</p> <p>Direction of photo: Southwest</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 12</p> <p>Description: Soil cover and asphalt</p> <p>Direction of photo: Southeast</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>

PHOTOGRAPH LOG

Hanna Furnace Sub-Parcel 3
2024 Periodic Review Report
Buffalo, New York

	<p>Photograph: 13</p> <p>Description: Soil cover and asphalt</p> <p>Direction of photo: West</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 14</p> <p>Description: Soil cover, vegetation, and asphalt</p> <p>Direction of photo: East</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>



PHOTOGRAPH LOG

Hanna Furnace Sub-Parcel 3
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	<p>Photograph: 15</p> <p>Description: Soil cover with tire tracks</p> <p>Direction of photo: West</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 16</p> <p>Description: Soil cover, vegetation, and asphalt</p> <p>Direction of photo: East</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>

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	<p>Photograph: 17</p> <p>Description: Soil cover, asphalt with tire tracks</p> <p>Direction of photo: South</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 18</p> <p>Description: Soil cover, vegetation, and asphalt with minor ponding</p> <p>Direction of photo: South</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>

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	<p>Photograph: 19</p> <p>Description: Soil cover, vegetation, and asphalt</p> <p>Direction of photo: West</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 20</p> <p>Description: Canal wall</p> <p>Direction of photo: Southwest</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>

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Photograph: 21

Description:
Soil cover, vegetation,
and asphalt

Direction of photo:
Southeast

Photograph taken by:
L. Goetz

Date: 4/12/24



Photograph: 22

Description:
Soil cover, vegetation,
and asphalt

Direction of photo:
South

Photograph taken by:
L. Goetz

Date: 4/12/24

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	<p>Photograph: 23</p> <p>Description: Soil cover, vegetation, and asphalt</p> <p>Direction of photo: South</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 24</p> <p>Description: Soil cover and vegetation</p> <p>Direction of photo: South</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>

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	<p>Photograph: 25</p> <p>Description: Soil cover, vegetation, and asphalt</p> <p>Direction of photo: West</p> <p>Photograph taken by: L.Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 26</p> <p>Description: Soil cover and vegetation</p> <p>Direction of photo: North</p> <p>Photograph taken by: L.Goetz</p> <p>Date: 4/12/24</p>



PHOTOGRAPH LOG

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	<p>Photograph: 27</p> <p>Description: Soil cover, vegetation, and asphalt</p> <p>Direction of photo: East</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 28</p> <p>Description: Soil cover, vegetation, and asphalt with minor ponding</p> <p>Direction of photo: Southwest</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>



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	<p>Photograph: 29</p> <p>Description: Canal wall</p> <p>Direction of photo: Northeast</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 30</p> <p>Description: Soil cover, vegetation, canal wall, and asphalt</p> <p>Direction of photo: Southwest</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>

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	<p>Photograph: 31</p> <p>Description: Canal wall</p> <p>Direction of photo: East</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>
	<p>Photograph: 32</p> <p>Description: Soil cover and asphalt</p> <p>Direction of photo: East</p> <p>Photograph taken by: L. Goetz</p> <p>Date: 4/12/24</p>

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