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WATER
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MANAGEMENT

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July 13, 2018
File No. 03.0033579.09

Mr. David Szymanski
Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 9
270 Michigan Avenue
Buffalo, New York 14203-2915

Re: Site Management Periodic Review Report and IC/EC Certification Submittal
Monitoring Period: May 5, 2017 through May 5, 2018
Tecumseh Redevelopment Site (Site No. C915205)
Lackawanna, New York

Dear Mr. Szymanski:

GZA GeoEnvironmental, Inc. (GZA) is pleased to submit this Site Management Periodic Review Report and Institutional Controls/Engineering Controls (IC/EC) Certification Submittal (PRR) to the New York State Department of Environmental Conservation (NYSDEC), for the Steel Winds I portion of the Tecumseh Redevelopment Site (Site No. C915205), located in Lackawanna, New York. This letter report has been prepared on behalf of the Site operator, Niagara Wind Power, LLC (NWP)/Erie Wind Power, LLC (EWP), an affiliate of TerraForm Power, and has been prepared in general accordance with NYSDEC's March 22, 2018 letter to BQ Energy and NYSDEC's DER-10 Technical Guidance for Site Investigation and Remediation, dated May 23, 2010. This letter report is subject to the Limitations provided in Attachment A.

EXECUTIVE SUMMARY AND SITE OVERVIEW

Tecumseh Redevelopment, Inc. (Tecumseh) owns approximately 1,100 acres of land at 1951 Hamburg Turnpike, as shown on Figure 1. The property was formerly used for the production of steel, coke and related products by Bethlehem Steel Corporation (BSC). Steel production on the Tecumseh property was discontinued in 1983 and the coke ovens ceased activity in 2000. Tecumseh acquired the property, along with other BSC assets, out of bankruptcy in 2003.

In September 2006, BQ Energy entered into a long-term lease agreement with Tecumseh to construct and operate wind turbines and supporting power generation equipment and infrastructure on an approximately 29-acre parcel of the Tecumseh property, referred to as the Steel Winds Site. BQ Energy and the NYSDEC also entered into a Brownfield Cleanup Agreement for the Steel Winds Site. The Site is wholly contained within the Slag Fill Area (SFA) Zones 3 and 4 of the Tecumseh property bordered by Lake Erie to the west, Smokes Creek to the south, and former industrial lands of BSC to the north and east, as shown on Figure 2. A Site Plan is provided as Figure 3. NWP/EWP operates the eight wind turbines installed at the Site.



The Brownfield Cleanup Program (BCP) was successful in achieving the remedial objectives for the Steel Winds Site. The Site Management Plan (SMP) and Final Engineering Report (FER) were approved by NYSDEC in December 2007. NYSDEC issued a Certificate of Completion (COC) for the Site on December 18, 2007.

The remedial activities conducted at the Site include:

- Excavation and off-site disposal of impacted slag fill from the eight wind turbine foundations and interconnecting utility trenches;
- In-situ enhanced biodegradation of residual volatile organic compounds (VOCs), including benzene, toluene, total xylenes, and naphthalene, using oxygen release compound (ORC®) socks within the saturated soil and groundwater in the vicinity of WT-01 and associated monitoring; and,
- Completion of a soil cover system.

The IC/EC (i.e., a soil cap and land use restrictions) are in general compliance with the SMP. Minimal areas of soil erosion, rutting and thin vegetation were observed during a site observations made by GZA on May 24, 2018. No evidence of animal burrow holes was observed. Repairs/maintenance to isolated areas of thin vegetation and/or vehicle ruts or erosion to the soil cap, if identified, are typically repaired as part of routine maintenance.

RECENT PROGRAM MODIFICATIONS

No changes to the SMP are recommended at this time. PRR evaluations should continue to be conducted on an annual basis, and GZA believes that the requirements for discontinuing site management have not yet been met.

SITE MANAGEMENT PLAN

A SMP was prepared for the Site and approved by NYSDEC in December 2007. The SMP includes an Operation, Monitoring, and Maintenance (OM&M) Plan, a Soil/Fill Management Plan (SFMP), and Environmental Easements. The OM&M Plan consists of three major components: 1) the Site-wide LTGWM Plan and WT-01 Vicinity monitoring; 2) a WT-01 Vicinity ORC Monitoring and Maintenance Plan; and 3) the Annual Inspection & Certification Program. A brief description of the components of the SMP is presented below.

Groundwater Monitoring OM&M Plan

As a requirement of the SMP, LTGWM is being performed at nine (9) wells across the Site. The following semi-annual and annual groundwater reports have been prepared by GZA and submitted to NYSDEC in accordance with the SMP since our previous PRR submission in June 2017.

- “September 2017 Annual-Semi-Annual Groundwater Monitoring Report, Niagara Wind Power, LLC, / Erie Wind Power, LLC, Steel Winds I Facility, Lackawanna, New York” prepared by GZA GeoEnvironmental of New York for Niagara Wind Power, LLC, / Erie Wind Power, LLC, dated, December 2017.
- “March 2018 Semi-Annual Groundwater Monitoring Report, Steel Winds I Facility, Lackawanna, New York” prepared by GZA GeoEnvironmental of New York for Niagara Wind Power, LLC / Erie Wind Power, LLC, dba TerraForm Power, dated, May 2018.



The two monitoring reports listed above have previously been provided under separate cover and submitted electronically to NYSDEC. GZA is currently scheduled to conduct the next annual/semi-annual sampling event consisting of the nine (9) LTGWM wells and the six (6) WT-01 vicinity wells in September 2018.

As discussed in GZA's May 9, 2012 letter, six wells in the WT-01 vicinity (BCP-ORP-1, MWN-01, MWN-01B, WT1-02, WT1-04 and replacement well WT1-05) will be sampled on a semi-annual basis for the following compounds:

- STARS list VOCs via EPA Method 8260B; and
- Base-Neutral semi-volatile organic compounds via EPA Method 8270C.

The LTGWM Plan will continue in accordance with the SMP.

As described in the May 9, 2012 letter, remedial alternatives have not yet been selected or implemented for the various Solid Waste Management Units (SMUs) which make up the former Bethlehem Steel Site (i.e., the Tecumseh Redevelopment property). Assessing the relative contaminant contribution from the Steel Winds Site is difficult. As such, GZA proposed that the recently agreed to semi-annual groundwater monitoring in the WT-01 vicinity continue until these remedies have been selected, implemented and their effectiveness evaluated. Once this has occurred, the relative impact of the contaminant contribution from the Steel Winds Site can be assessed.

On September 30, 2013, GZA submitted a Technical Impracticability Waiver Supplemental Field Studies Work Plan for the Site, detailing sampling, laboratory analysis, data evaluation and reporting to be conducted in support of a Technical Impracticability Waiver request for the Site. This Work Plan was approved by NYSDEC on February 24, 2014. The Work Plan was implemented in the summer 2014 and a Technical Impracticability Waiver Application was submitted to NYSDEC on November 5, 2014. In the application GZA evaluated five potential remedies for the WT-01 AOC using criteria described in DEC's DER-10 (Technical Guidance for Site Investigation and Remediation, dated May 3, 2010) and EPA's "Guidance for Evaluating Guidance for Evaluating the Technical Impracticability of Ground-Water Restoration", dated September 1993.

- Monitored Natural Attenuation (MNA);
- Air Sparge/biosparge with a contingency enhanced denitrification system;
- Reactive Barrier (Air-sparge/biosparge curtain using a continuous stone trench with a contingency enhanced denitrification injection system);
- In-situ Chemical Oxidation (ISCO); and
- Hydrodynamic Groundwater Containment (HGC).

Additionally, we conducted an environmental evaluation of the specific WT-01 AOC. The study included an evaluation of the potential impact of groundwater discharges to adjacent water bodies and benthic invertebrates, a regional groundwater mass flux and contaminant mass loading evaluation, as well as an ecological risk assessment. The study concluded that:

- Previously implemented Institutional and Engineering Controls (IC/ECs) voluntarily implemented at the Steel Winds Site under the Brownfield Cleanup Program (BCP), including a soil cap and offsite disposal of displaced soil and activity and use limitations, have effectively mitigated potential risks to human health.



- The Fish and Wildlife Resource Impact Analysis (FWRIA)¹ prepared by GZA identified PAHs in sediment, and certain VOCs in pore water within Smokes Creek, at concentrations that may potentially be harmful to exposed aquatic/benthic organisms. Inputs from sources other than the WT-01 pore water likely contributed to the concentrations of PAHs and VOCs measured. Furthermore, comparisons of sediment and pore water data to screening levels likely resulted in a conservative assessment because of the limited number of PAHs reported, and suspended particulates in the pore water samples. For this reason, GZA recommended additional sampling to evaluate the relative contribution from other sources, and to collect data more representative of potential bioavailability and risk to ecological receptors.

Based on this evaluation, it is GZA's opinion that active remediation is not warranted or feasible, would not result in significant benefit to the environment relative to the cost, and is technically impracticable.

As noted, GZA recommended, and in April 2015 DEC personnel approved, additional surface water and sediment sampling and analysis from Smoke Creek and Lake Erie to further evaluate potential impacts to ecological receptors. The field work was completed in August and September of 2015 and a Supplement TI Waiver Report was submitted to NYSDEC on April, 24 2018.

Engineered and Institutional Controls

An engineered control (EC) consisting of a soil cover system has been installed at the Site. Maintenance of the 12-inch soil and vegetated cover system is being performed in compliance with the SMP.

The Steel Winds Site is subject to the following institutional controls (ICs):

- Groundwater-Use Restriction – the use of groundwater for potable and non-potable purposes is prohibited;
- Land-Use Restriction - the controlled property may be used for commercial and/or industrial use;
- Implementation of the SMP including the OM&M Plan and SFMP.

The SFMP provides guidelines for the management of soil and fill material during any intrusive activities. No intrusive activities requiring management of on-Site soil or fill material, or the placement of backfill materials (beyond that required for minor cap repairs described in last year's report), are known to have occurred during the current monitoring period.

Annual Inspection and Certification Program

As a requirement of the SMP and in accordance with NYSDEC DER-10, this PRR is to provide the information necessary to document the basis for the IC/EC certification. The certification primarily consists of an annual Site inspection to complete NYSDEC's IC/EC Certification Form in order to confirm that:

¹ Note that an information request was submitted to the New York Natural Heritage (NYSNH) Program, as the DEC ERM indicated that rare species habitat is present in Lake Erie adjacent to the Site. The results were not available in time to be reported with the November 5, 2014 TI Waiver Application. The results of that inquiry were subsequently reported to DEC in a letter dated January 28, 2015. They substantiated the findings presented in the TI Waiver Application and confirmed the need for a limited supplemental ecological evaluation.



- The IC/ECs are in place, performing properly, and remain effective;
- Nothing has occurred that would impair the ability of the controls to protect the public health and environment;
- Nothing has occurred that would constitute a violation or failure to comply with any operation and maintenance plan for the IC/ECs; and
- Access is available to the Site to evaluate continued maintenance of the IC/ECs.

A Site visit of the property was conducted by GZA on May 24, 2018 and the IC/EC Certification Form has been signed by an engineer who meets the requirements of a Qualified Environmental Professional (QEP) and is a Professional Engineer registered in the State of New York. At the time of the inspection, the Site was observed to be in compliance with the IC/ECs. Limited surface damage (minor rutting and thin vegetation coverage) to the vegetated cover system in the vicinity of WT-01 through WT-08 was noted during the site visit. The limited surface damage was likely the result of occasional vehicular traffic on the cap during moist to wet conditions. In general, the LTGWM network was noted to be in good condition. As part of routine maintenance, the minor grading and vegetative cover repairs will be conducted by NWP/EWP during the summer of 2018, as weather conditions permit.

During our previous Site visits, two over-pack drums reportedly containing the collected grass, gravel and absorbent pads associated with a 2015 reported spill (NYSDEC Spill#1502332) were observed stored adjacent to the spare electrical transformer containment area (between WT-5 and WT-6). GZA did not observe these drums during our Site visit and an NWP/EWP employee indicated these drums have since been removed from the Site by Safety Kleen. A check of the NYSDEC Spill data base indicated the spill remains open at the time of this report.

The completed Institutional and Engineering Controls Form is included in Attachment B. A photographic log of the Site inspection is included in Attachment C.

CONCLUSIONS AND RECOMMENDATIONS

Conclusions and recommendations are as follows:

- At the time of the Site inspection, the Site was in compliance with the IC/ECs including: groundwater monitoring, maintenance of the cover system, land-use restrictions, groundwater-use restrictions, and soil/fill management plan.
- Minor surface and vegetative cover damage was noted in the vicinity of WT-01 through WT-08. The cover system damages are currently being addressed, and repairs are expected to be completed by NWP/EWP as part of routine maintenance. Grass mowing and routine cover system maintenance should be continued at the Site in an effort to keep the cover in good condition.
- Site-wide LTGWM and WT-01 vicinity groundwater monitoring will be continued. In accordance with the SMP, the next semi-annual WT-01 and LTGWM event is scheduled for September 2018.
- The groundwater remedy for the WT-01 Vicinity has been re-evaluated as described above.



- No modifications to the current SMP are recommended at this time. PRR evaluations should continue to be conducted on an annual basis and GZA believes that the requirements for discontinuing site management have not yet been met.

We trust this letter report addresses your requirements. If you need any additional information, please feel free to contact Ed or Rick at (401) 421-4140 or via email at edward.summerly@gza.com or richard.carlone@gza.com.

Sincerely,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink, appearing to read 'Richard A. Carlone'.

Richard A. Carlone, P.E.
Senior Project Manager

A handwritten signature in blue ink, appearing to read 'Daniel J. Troy'.

Daniel J. Troy, P.E.
Consultant/Reviewer

A handwritten signature in blue ink, appearing to read 'Edward A. Summerly'.

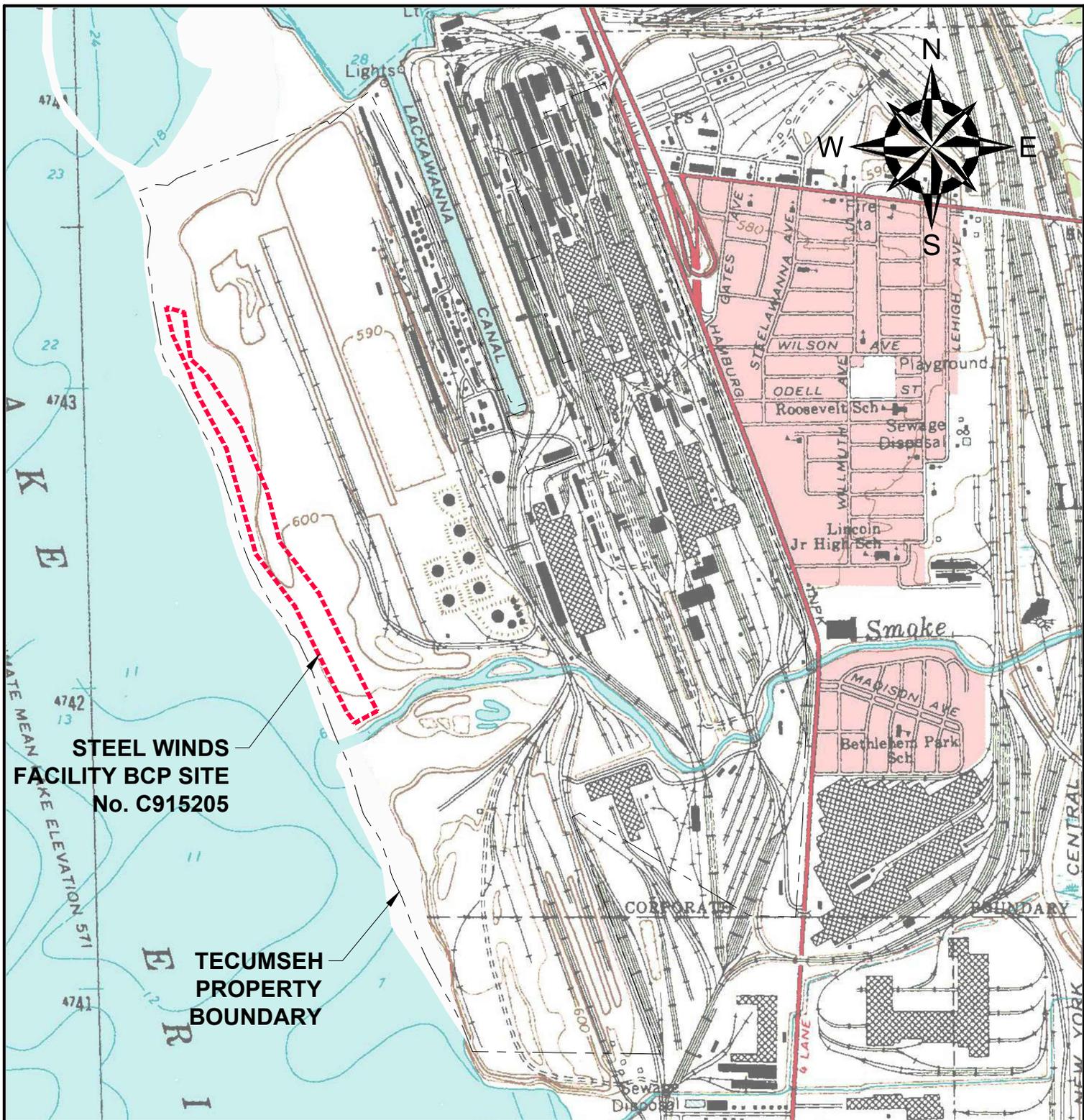
Edward A. Summerly, P.G.
Principal

RAC/EAS:blm

Attachments: Figures 1 through 3
 Attachment A - Limitations
 Attachment B - Institutional and Engineering Controls Form
 Attachment C - Site Photographs

cc: Maurice Moore, NYSDEC
 Michael Andrzejczak, Sun Edison, LLC (electronic copy)

FIGURES



**STEEL WINDS
FACILITY BCP SITE
No. C915205**

**TECUMSEH
PROPERTY
BOUNDARY**

NOTE:
BASE MAP ADAPTED FROM A 1965
U.S.G.S. TOPOGRAPHIC MAPS
DOWNLOADED FROM <http://store.usgs.gov>



NO.	ISSUE/DESCRIPTION	BY	DATE

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PREPARED BY:
**GZA GeoEnvironmental of N.Y.
Engineers and Scientists**
535 WASHINGTON STREET 11th FLOOR
BUFFALO, NEW YORK 14203
(716) 685-2300

PREPARED FOR:
**NIAGARA WIND POWER, LLC/
ERIE WIND POWER, LLC.**

PROJ MGR: DJT REVIEWED BY:
DESIGNED BY: DRAWN BY: TAK

**STEEL WINDS I FACILITY
ROUTE 5
LACKAWANNA, NEW YORK**

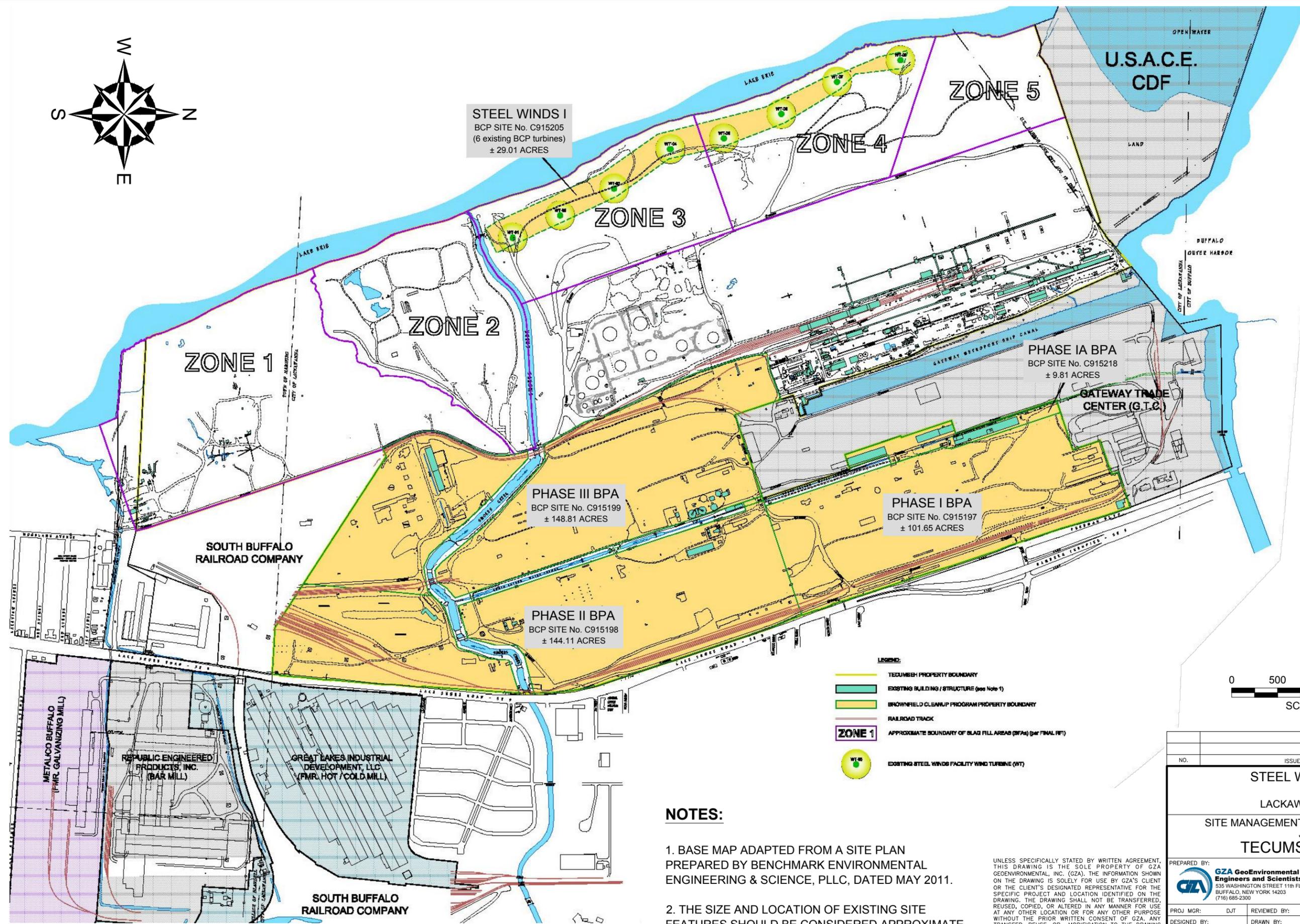
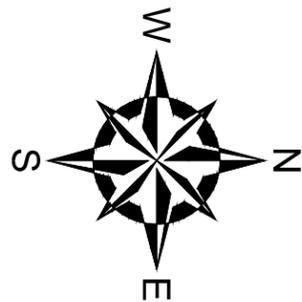
**SITE MANAGEMENT PERIODIC REVIEW REPORT
JUNE 2018
LOCUS PLAN**

CHECKED BY: DATE: JUNE 2018
SCALE: AS SHOWN

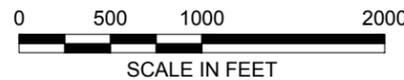
PROJECT NO. 03.0033579.09 REVISION NO.

FIGURE
1

SHEET NO.
1 of 3



- LEGEND:**
- TECUMSEH PROPERTY BOUNDARY
 - EXISTING BUILDING / STRUCTURE (see Note 1)
 - BROWNFIELD CLEANUP PROGRAM PROPERTY BOUNDARY
 - RAILROAD TRACK
 - ZONE 1 APPROXIMATE BOUNDARY OF SLAG FILL AREAS (BFAs) (per FINAL RFP)
 - EXISTING STEEL WINDS FACILITY WIND TURBINE (WT)



- NOTES:**
1. BASE MAP ADAPTED FROM A SITE PLAN PREPARED BY BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC, DATED MAY 2011.
 2. THE SIZE AND LOCATION OF EXISTING SITE FEATURES SHOULD BE CONSIDERED APPROXIMATE.

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NO.	ISSUE/DESCRIPTION	BY	DATE
STEEL WINDS I FACILITY ROUTE 5 LACKAWANNA, NEW YORK SITE MANAGEMENT PERIODIC REVIEW REPORT JUNE 2018 TECUMSEH SITE PLAN			
PREPARED BY: GZA GeoEnvironmental of N.Y. Engineers and Scientists <small>535 WASHINGTON STREET 11th FLOOR BUFFALO, NEW YORK 14203 (716) 685-2300</small>		PREPARED FOR: NIAGARA WIND POWER, LLC/ ERIE WIND POWER, LLC.	
PROJ MGR:	DJT	REVIEWED BY:	CHECKED BY:
DESIGNED BY:	TAK	DRAWN BY:	SCALE: AS SHOWN
DATE:	JUNE 2018	PROJECT NO.:	03.0033579.09
		REVISION NO.:	
			FIGURE 2
			SHEET NO. 2 of 3

© 2018 - GZA GeoEnvironmental of N.Y. GZA-4019000101/Steel Winds 2018. All Sampling/Per 2018. Site Plan/Map [Figure 2] May 24, 2018 - 10:54am. hudsonia.net

ATTACHMENT A
LIMITATIONS



GEOHYDROLOGICAL LIMITATIONS

Use of Report

1. GZA GeoEnvironmental, Inc. (GZA) prepared this report on behalf of, and for the exclusive use of our Client for the stated purpose(s) and location(s) identified in the Proposal for Services and/or Report. Use of this report, in whole or in part, at other locations, or for other purposes, may lead to inappropriate conclusions; and we do not accept any responsibility for the consequences of such use(s). Further, reliance by any party not expressly identified in the agreement, for any use, without our prior written permission, shall be at that party's sole risk, and without any liability to GZA.

Standard of Care

2. GZA's findings and conclusions are based on the work conducted as part of the Scope of Services set forth in the Proposal for Services and/or Report and reflect our professional judgment. These findings and conclusions must be considered not as scientific or engineering certainties, but rather as our professional opinions concerning the limited data gathered during the course of our work. Conditions other than described in this report may be found at the subject location(s).
3. GZA's services were performed using the degree of skill and care ordinarily exercised by qualified professionals performing the same type of services, at the same time, under similar conditions, at the same or a similar property. No warranty, expressed or implied, is made. Specifically, GZA does not and cannot represent that the Site contains no hazardous material, oil, or other latent condition beyond that observed by GZA during its study. Additionally, GZA makes no warranty that any response action or recommended action will achieve all of its objectives or that the findings of this study will be upheld by a local, state or federal agency.
4. In conducting our work, GZA relied upon certain information made available by public agencies, Client and/or others. GZA did not attempt to independently verify the accuracy or completeness of that information. Inconsistencies in this information which we have noted, if any, are discussed in the Report.

Subsurface Conditions

5. The generalized soil profile(s) provided in our Report are based on widely-spaced subsurface explorations and are intended only to convey trends in subsurface conditions. The boundaries between strata are approximate and idealized, and were based on our assessment of subsurface conditions. The composition of strata, and the transitions between strata, may be more variable and more complex than indicated. For more specific information on soil conditions at a specific location refer to the exploration logs. The nature and extent of variations between these explorations may not become evident until further exploration or construction. If variations or other latent conditions then become evident, it will be necessary to reevaluate the conclusions and recommendations of this report.

6. Water level readings have been made, as described in this Report, in and monitoring wells at the specified times and under the stated conditions. These data have been reviewed and interpretations have been made in this report. Fluctuations in the level of the groundwater however occur due to temporal or spatial variations in areal recharge rates, soil heterogeneities, the presence of subsurface utilities, and/or natural or artificially induced perturbations. The observed water table may be other than indicated in the Report.

Compliance with Codes and Regulations

7. We used reasonable care in identifying and interpreting applicable codes and regulations necessary to execute our scope of work. These codes and regulations are subject to various, and possibly contradictory, interpretations. Interpretations and compliance with codes and regulations by other parties is beyond our control.

Screening and Analytical Testing

8. GZA collected environmental samples at the locations identified in the Report. These samples were analyzed for the specific parameters identified in the report. Additional constituents, for which analyses were not conducted, may be present in soil, groundwater, surface water, sediment and/or air. Future Site activities and uses may result in a requirement for additional testing.
9. Our interpretation of field screening and laboratory data is presented in the Report. Unless otherwise noted, we relied upon the laboratory's QA/QC program to validate these data.
10. Variations in the types and concentrations of contaminants observed at a given location or time may occur due to release mechanisms, disposal practices, changes in flow paths, and/or the influence of various physical, chemical, biological or radiological processes. Subsequently observed concentrations may be other than indicated in the Report.

Interpretation of Data

11. Our opinions are based on available information as described in the Report, and on our professional judgment. Additional observations made over time, and/or space, may not support the opinions provided in the Report.

Additional Information

12. In the event that the Client or others authorized to use this report obtain additional information on environmental or hazardous waste issues at the Site not contained in this report, such information shall be brought to GZA's attention forthwith. GZA will evaluate such information and, on the basis of this evaluation, may modify the conclusions stated in this report.

Additional Services

13. GZA recommends that we be retained to provide services during any future investigations, design, implementation activities, construction, and/or property development/ redevelopment at the Site. This will allow us the opportunity to: i) observe conditions and compliance with our design concepts and opinions; ii) allow for changes in the event that conditions are other than anticipated; iii) provide modifications to our design; and iv) assess the consequences of changes in technologies and/or regulations.

ATTACHMENT B

INSTITUTIONAL AND ENGINEERING CONTROLS 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.	C915205	
Site Name Tecumseh Redevelopment, Inc.-Steelwinds		
Site Address: 1951 HAMBURG TURNPIKE Zip Code: 14218		
City/Town: Lackawanna		
County: Erie		
Site Acreage: 29.1		
Reporting Period: May 05, 2017 to May 05, 2018		
		YES NO
1. Is the information above correct?		<u>YES</u>
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?		<u>NO</u>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		<u>NO</u>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		<u>NO</u>
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?		<u>NO</u>
		Box 2
		YES NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial		<u>YES</u>
7. Are all ICs/ECs in place and functioning as designed?		<u>YES</u>
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

Box 2A

YES NO

8. Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?

NO

If you answered YES to question 8, include documentation or evidence that documentation has been previously submitted with this certification form.

9. Are the assumptions in the Qualitative Exposure Assessment still valid?
(The Qualitative Exposure Assessment must be certified every five years)

YES

If you answered NO to question 9, the Periodic Review Report must include an updated Qualitative Exposure Assessment based on the new assumptions.

SITE NO. C915205

Box 3

Description of Institutional Controls

Parcel

Owner

Institutional Control

141.11-1-1.111

Tecumseh Redevelopment, Inc.

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

(i) Compliance with the Site Management Plan ("SMP") for the implemented remedy;

(ii) Maintenance of the 12 inch soil cover system and vegetation over the Site;

(iii) The groundwater beneath the Site cannot be used as a potable water source or for any other use without the prior written permission of the Department;

(iv) Groundwater monitoring as specified in the SMP;

(v) In the event that buildings are constructed, a Department approved evaluation of potential sub-slab vapor impacts will be required.

Box 4

Description of Engineering Controls

Parcel

Engineering Control

141.11-1-1.111

Cover System

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

- a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;
- b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

- (a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;
- (b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;
- (c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;
- (d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and
- (e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

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. C915205

Box 6

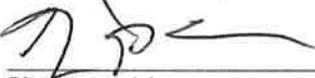
SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

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 Ryan A Fonbuena at 29995 Technology Dr. Ste 200, Murrieta, CA 92563
print name print business/address

am certifying as HSSE Manager (Owner or Remedial Party)

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



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

07/12/2018

Date

IC/EC CERTIFICATIONS

Box 7

Professional Engineer Signature

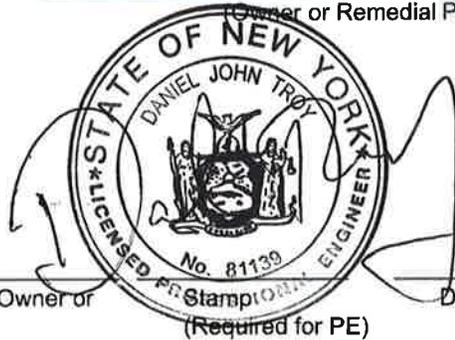
I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

GEA GEUEENVIRONMENTAL OF NY

I DANIEL TROY at 300 PEARL ST., FL. 700, BUFFALO, NY 14202
print name print business address

am certifying as a Professional Engineer for the STEELWINDS (MAGARA POWER LLC / ERIE POWER LLC)
(Owner or Remedial Party)

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



7/12/18
Date

Stamp (Required for PE)

APPENDIX C
SITE PHOTOGRAPHS

Periodic Review Report

Steel Winds Site 2017
BCP Site No. C915205
Lackawanna, New York

File No. 03.0033579.09



View of southern end of cover system.



View of turbines and cover system looking northerly.



View of cover system looking westerly.



View of storm water catch basin looking southwesterly.



View of WT 3 looking northerly. Note turbine blade under repair.



View of thin grass coverage on cover system.

Periodic Review Report

Steel Winds Site 2017
BCP Site No. C915205
Lackawanna, New York

File No. 03.0033579.09



View of thin grass on cover system.



Extra transformer storage and electrical equipment in concrete containment.



View of turbine array looking southerly.



View of soil cover east of access road in northern portion of Site.



Northern portion of cover system,
east of access road.



View of soil cover looking northerly
towards WR 7 and WT8.