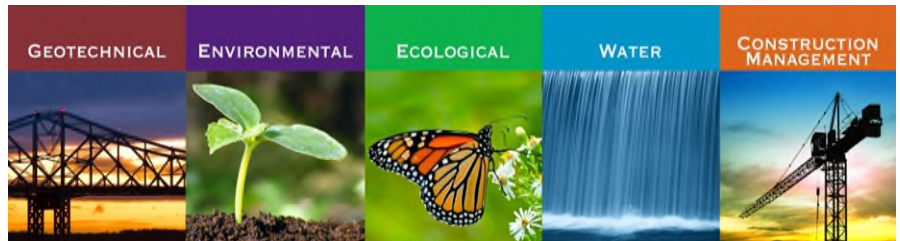




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## **2022 PERIODIC REVIEW REPORT SPECIAL METALS CORPORATION DUNKIRK, NEW YORK NYSDEC Site Number 907031**

March 10, 2022

File No. 21.0056196.51



### **PREPARED FOR:**

Special Metals Corporation  
Dunkirk, New York

### **GZA GeoEnvironmental of New York**

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www.gza.com



**VIA EMAIL**

March 10, 2022  
File No. 21.0056196.50

Mr. Joshua Vicaro  
New York State Department of Environmental Conservation  
Division of Environmental Remediation  
270 Michigan Avenue  
Buffalo, New York 14203  
EMAIL: david.szymanski@dec.ny.gov

Re: 2022 Periodic Review Report (NYSDEC Site No. 907031)  
Special Metals Corporation  
100 Willowbrook Avenue  
Dunkirk, New York

Dear Mr. Vicaro:

GZA GeoEnvironmental of New York (GZA), on behalf of Special Metals Corporation (SMC), provides this Periodic Review Report (PRR) for the Specialty Metals Corporation Site (Site), located at 100 Willowbrook Avenue, Dunkirk, New York. The Site was designated by the New York State Department of Environmental Conservation (NYSDEC) as Site number 907031 and was remediated in 2007 by SMC under Order on Consent No. B9-0737-07-02.

This is the third PRR to be submitted for the Site since the NYSDEC issued a Satisfactory Completion of Remediation Letter dated February 1, 2018. As part of the post-remedial obligations under the Site Management Plan, periodic Site inspections and reporting are required. GZA prepared this PRR for reporting period February 8, 2019 to February 8, 2022 in general conformance with the guidelines provided to SMC by NYSDEC in a reminder notice letter dated December 28, 2021.

If you have any questions or need additional information, please call Jim Richert at (716) 844-7048.

Sincerely,

GZA GEOENVIRONMENTAL OF NEW YORK

James J. Richert, P.G.  
Senior Project Manager

Bart A. Klettke, P.E.  
Principal

Cc: Craig Romanowski (Special Metals Corporation)  
Ben McPherson (NYSDEC Region 9)





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FIGURE 2 SMC FACILITY PLAN AND AREA OF CONCERN

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FIGURE 3B SITE PLAN WITH PHOTO LOCATIONS (NOVEMBER 6, 2020)

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## APPENDICES

APPENDIX A AOC INSPECTION FORMS (2019, 2020, AND 2021)

APPENDIX B PHOTOGRAPH LOGS (2019, 2020, AND 2021)

APPENDIX C IC/EC CERTIFICATION FORM



## 1.0 EXECUTIVE SUMMARY

### 1.1 BACKGROUND

The Special Metals Corporation (SMC) facility in Dunkirk, N.Y. is approximately 8 acres in size, 2.0 acres of which is referred to as the “Area of Concern” (AOC). The AOC was the subject of an environmental cleanup and remains subject to a Site Management Plan (SMP) which, among other things, requires periodic Site inspections and reporting.

In August 2006, during a building expansion project, impacted soil containing hazardous concentrations of PCBs was encountered at the facility. Interim Remedial Measure (IRM) activities were performed in 2007 and included excavation and off-site disposal of the impacted soils from six excavations within the AOC. A limited volume of impacted soil remains within the AOC and is located beneath existing structures and at the western property boundary. Remedial excavations were backfilled with clean crushed stone and covered by asphalt pavement and/or clean topsoil with a vegetative cover. Certain precautions and management of remaining contamination are required through implementation of Institutional and Engineering Controls (IC/ECs) put in place for the AOC.

The IC/ECs for the AOC are as follow:

#### Institutional Controls:

- The Site may be used for commercial or industrial use in accordance with the SMP;
- Restriction of the use of groundwater as a source of potable or process water without necessary water quality treatment; and
- Compliance with the NYSDEC-approved SMP.

#### Engineering Controls:

- Cover System – The cover system is comprised of a minimum of 24 inches of crushed stone covered by either vegetated clean topsoil, asphalt pavement, concrete sidewalks, and/or concrete building slabs;
- Security Fencing – The AOC is and shall remain surrounded by a minimum 8-foot-high chain link security fence.

An SMP is being implemented by SMC to protect Site users from exposure to the remaining covered contamination, to maintain the IC/ECs, and to document compliance with the Environmental Easement (EE).

### 1.2 EFFECTIVENESS OF THE REMEDIAL PROGRAM

GZA confirmed that the Site cover system is in place, complete, and generally in good condition. Vegetative cover was also observed to be acceptable, with no bare patches observed. The Site perimeter fence was confirmed present, completely surrounding the Site, and generally in good condition.

The Site engineering controls remain in place, in acceptable condition, and continue to be effective at meeting the Site’s Remedial Action Objectives (RAOs).



### 1.3 COMPLIANCE

GZA observed the Site as in compliance with the SMP. The Institutional Controls and Engineering Controls (IC/ECs) remain in place.

### 1.4 RECOMMENDATIONS

GZA and SMC recommend no changes to the SMP nor to the frequency of Site inspections and PRR submittals. Implementation of the SMP, including the maintenance of the Site perimeter fence and Site cover system, will continue as prescribed in the SMP.

## 2.0 SITE OVERVIEW

### 2.1 SITE LOCATION AND FEATURES

The SMC facility is an active specialty steel manufacturing facility located on approximately 8-acres of land located at 100 Willowbrook Avenue in the City of Dunkirk, County of Chautauqua, New York. The facility is bounded by the former Al-Tech Specialty Steel Site to the north, east and west, and by Willowbrook Avenue to the south beyond which are residential homes (see **Figure 1**). The boundaries of the 2.0-acre Area of Concern (AOC) subject to the Site Management Plan (SMP) are illustrated on **Figure 2**.

The tracts of land which make up the SMC facility and the former Al-Tech site were formerly owned and operated by a single owner, Allegheny Ludlum Industries, Inc., which utilized the properties for the manufacturing of steel products. Construction on the SMC facility began in 1956.

In 1976, Allegheny Ludlum Industries, Inc. conveyed the Al-Tech Site to Al-Tech Specialty Steel Corporation and retained title to the Forge facility (SMC facility). SMC obtained title to the Forge facility in 1983 by deed from Allegheny International Inc. (formerly known as Allegheny Ludlum Steel Corporation and Allegheny Ludlum Industries, Inc.).

SMC filed a Chapter 11 bankruptcy petition on March 27, 2002 and emerged from bankruptcy on November 26, 2003. On May 25, 2006, Precision Castparts Corporation completed its acquisition of SMC.

In 2006, during an expansion of the western end of the manufacturing building, impacted soil was encountered in utility trenches. The primary contaminants of concern were polychlorinated bi-phenyls (PCBs).

### 2.2 INVESTIGATION AND REMEDIAL HISTORY

In February 2007 SMC and NYSDEC signed an Order on Consent (No. B9-0737-07-02) for remediation of the Area of Concern (AOC)(Site) which is an area approximately 2-acres in size at the southwestern corner of the 8-acre facility (**Figure 2**). That same year, SMC completed an Interim Remedial Measure (IRM) to remediate the impacted soils of the AOC. The IRM work included excavation and off-site disposal of PCB-impacted ( $\geq 10$  PPM) soils at six excavation sites within AOC. A total of approximately 6,700 tons of PCB-impacted soils were removed from the Site and disposed as hazardous waste at the Chemical Waste Management facility in Model City, New York. Remedial excavations were backfilled with clean crushed stone supplied by Buffalo Crushed Stone's



Wehrle Drive Pit. The excavations were backfilled to existing ground surface and were resurfaced with asphalt pavement and/or top soil with grass cover.

Soils containing PCBs at concentrations greater than the Soil Cleanup Objective for Industrial Site use (ISCO) (25 PPM) remain on site at a few locations within the AOC. The locations of the remaining impacted soils are where IRM excavations were terminated because of physical limitations posed by existing site buildings and/or the western property boundary. The remaining soil contamination of the AOC is not volatile and is located beneath the cover system.

SMC has achieved the Remedial Action Objectives of the Consent Order by reducing the volume of contaminated soil present at the AOC and reducing potential impacts to human health and the environment.

The SMP was approved by the NYSDEC on May 2, 2014 and addresses impacted soil and/or groundwater, if encountered, during construction or excavation activities.

Since soils containing contaminants at concentrations greater than the cleanup objective remain on the Site, Institutional Controls (ICs) and Engineering Controls (ECs) were implemented to protect public health and the environment. A detailed discussion of the ICs and ECs is provided in the SMP. IC/ECs are summarized in section 4.1.

### **3.0 EVALUATION OF REMEDY PERFORMANCE, EFFECTIVENESS, AND PROTECTIVENESS**

GZA conducted annual Site Inspections on November 22, 2019, November 6, 2020, and October 29, 2021, for the reporting period February 8, 2019 to February 8, 2022. Observations of the Site conditions were noted on AOC Inspection Forms (**Appendix A**) and photo-documented. Photo logs from the three inspections are provided in **Appendix B** and maps showing the location and orientation of the Site photos are provided as **Figures 3A, 3B, and 3C**. With only minor exceptions, which SMC addresses as needed, the site cover system was observed providing complete coverage of the Site and appears to be in good condition. The Site perimeter fence was in place and generally in good condition. The Site remedy, therefore, continues to be effective at meeting the Site RAOs for protection of Site users.

### **4.0 INSTITUTIONAL CONTROL/ENGINEERING CONTROL (IC/EC) PLAN COMPLIANCE REPORT**

#### **4.1 IC/EC REQUIREMENTS AND COMPLIANCE**

IC/ECs for the site were determined by the NYSDEC and specified in the Environmental Easement (EE) signed by the NYSDEC on April 25, 2016. The IC/ECs are also included in the SMP which was prepared by GZA and approved by the NYSDEC on May 2, 2014. Complete lists of the Site IC and ECs are provided in Section 1.4.5 of the SMP. Summary lists of the ICs and ECs are provided below:



#### Summary of Site Institutional Controls:

- The Site may be used for commercial or industrial use in accordance with the SMP;
- Restriction of the use of groundwater as a source of potable or process water without necessary water quality treatment; and
- Compliance with the EE and SMP.

#### Summary of Site Engineering Controls:

- Cover System: The cover system is comprised of a minimum of 24 inches of crushed stone covered by either clean topsoil, asphalt pavement, concrete-covered sidewalks, and/or concrete building slabs.
- Security Fence: The AOC and SMC facility are surrounded by a minimum 8-foot-high chain link security fence, with the exception of a 60-foot section that is the main driveway access point to the SMC facility parking lot from Willowbrook Avenue in the southwestern corner of the property. The property is under video surveillance and a security guard is on duty 24-hours a day, seven days a week.

GZA observed the Site to be in compliance with of the SMP. The IC/ECs remain in place and there are no active remedial systems requiring monitoring or operation and maintenance.

#### 4.2 IC/EC CERTIFICATION

A blank Site-specific IC/EC Certification Form, for the reporting period of February 8, 2019, through February 8, 2022, was provided to SMC as an attachment to the December 28, 2021 Reminder Notice letter sent by the NYSDEC. This form has been completed by SMC as Site owner and Certified by GZA as Qualified Environmental Professional (QEP). The completed IC/EC Certification Form for this reporting period is provided in **Appendix C** of this PRR.

### 5.0 PRR CONCLUSIONS AND RECOMMENDATIONS

#### 5.1 PRR CONCLUSIONS

GZA confirms and hereby documents the IC/ECs to be in place, in good condition, and performing as intended.

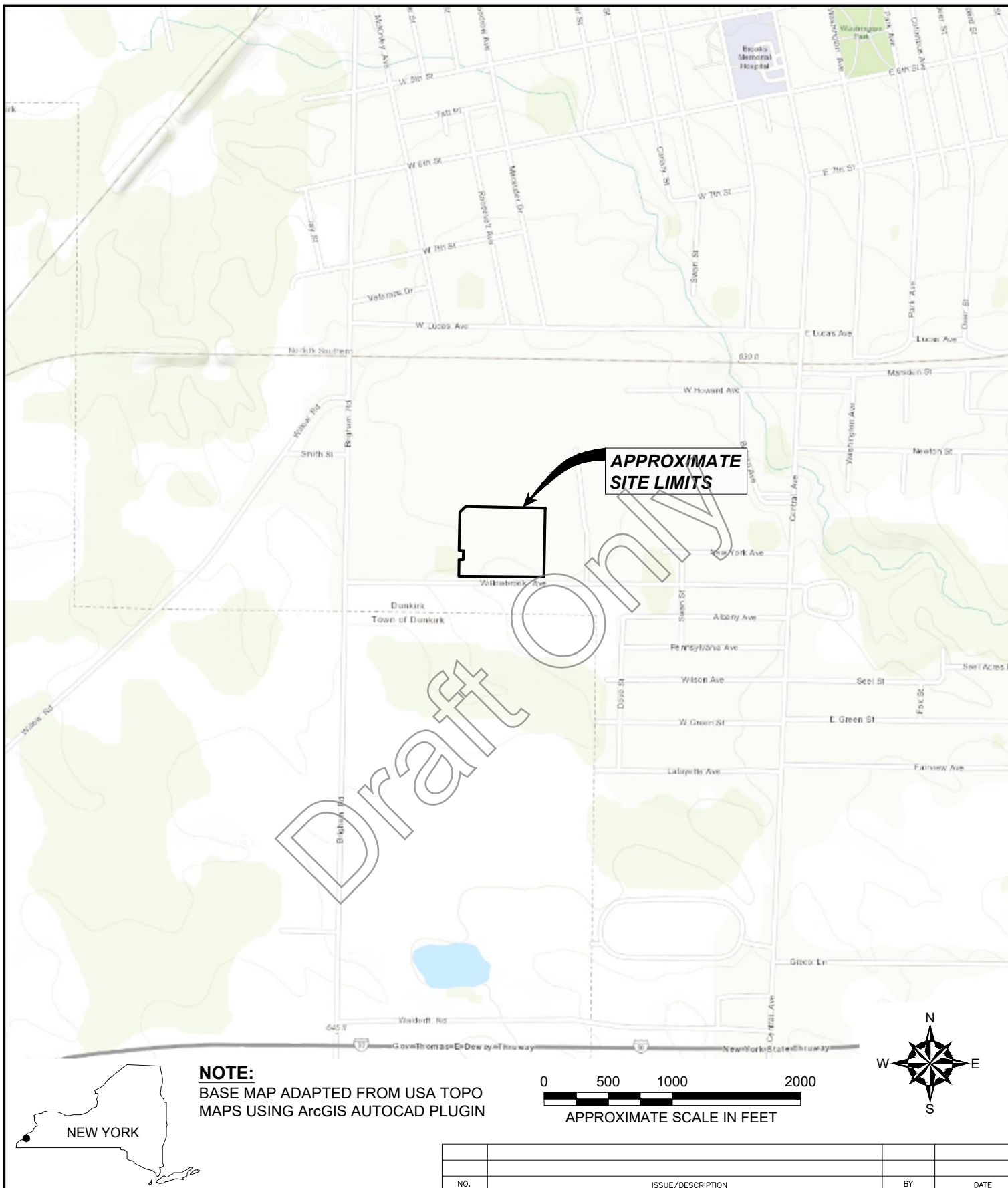
#### 5.2 PRR RECOMMENDATIONS

GZA and SMC recommend no changes to the SMP nor to the frequency of Site inspections and PRR submittals. Implementation of the SMP, including the Excavation Plan and maintenance of the Site cover system and perimeter fence will continue annually. Per the SMP, the next annual Site inspection is to be performed during the month of October 2022.





**FIGURES**



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PREPARED BY:  
**GZA GeoEnvironmental of N.Y.**  
Engineers and Scientists  
300 Pearl Street, Suite 700  
Buffalo, New York 14202  
(716) 685-2300

PREPARED FOR:  
**SPECIAL METALS CORPORATION**


PROJ MGR: TB REVIEWED BY: JJR  
DESIGNED BY: TB DRAWN BY: MDK

**SPECIAL METALS CORPORATION**  
**100 WILLOWBROOK AVENUE**  
**DUNKIRK, NEW YORK**  
**SMP INSPECTIONS AND PRR REPORT**  
**LOCUS PLAN**

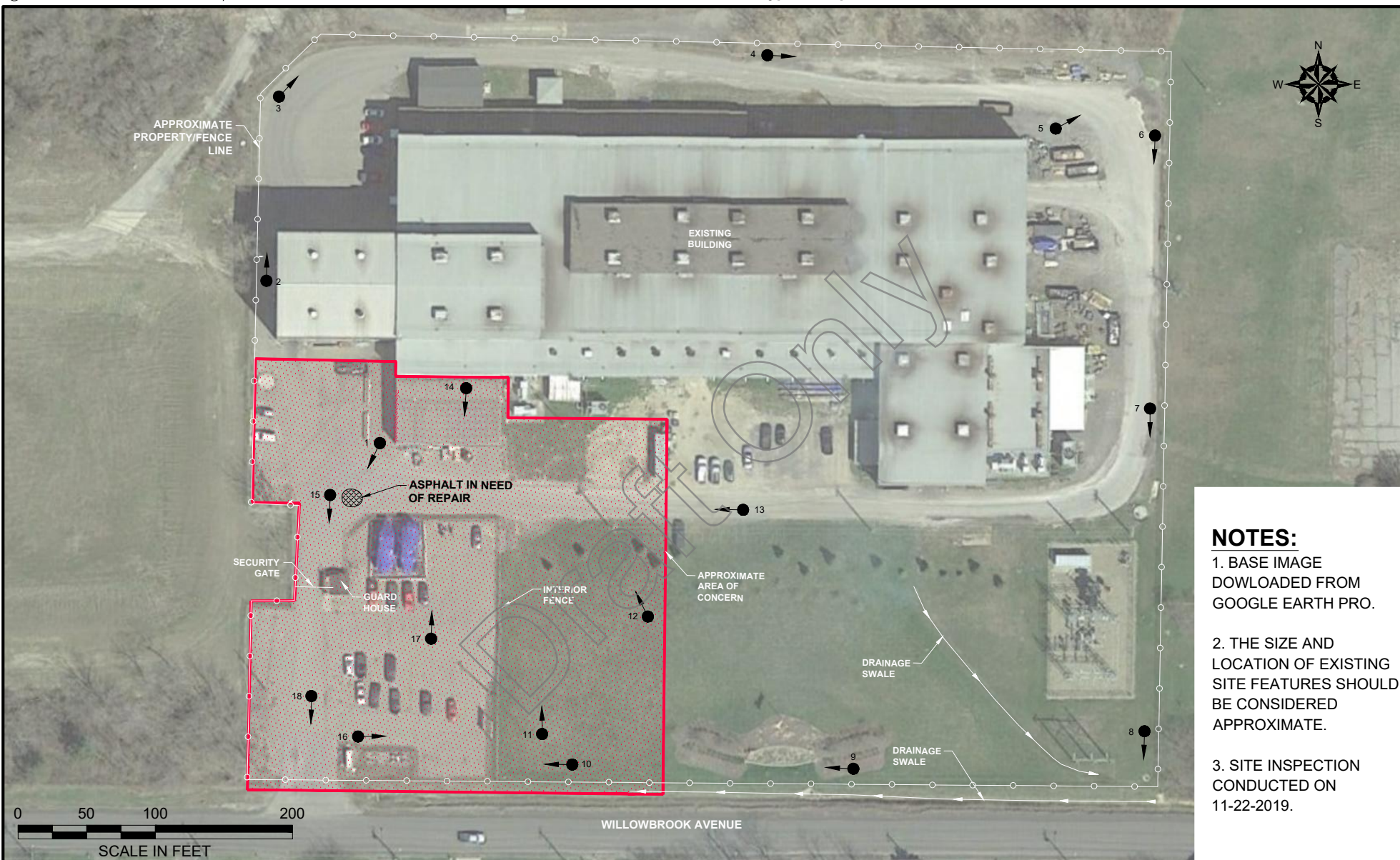
CHECKED BY: BAK DATE: FEBRUARY 2018  
PROJECT NO. 21.0056196.50  
REVISION NO.

FIGURE  
**1**

2. THE SIZE AND LOCATION OF EXISTING SITE FEATURES SHOULD BE CONSIDERED APPROXIMATE.

				SPECIAL METALS CORPORATION 100 WILLOWBROOK AVENUE DUNKIRK, NEW YORK				PREPARED BY:  <b>GZA</b> GeoEnvironmental of NY Engineers and Scientists www.gza.com				PREPARED FOR:  SPECIAL METALS CORPORATION							
								SMC FACILITY PLAN AND AREA OF CONCERN				PROJ MGR: TB		REVIEWED BY: BAK		CHECKED BY:		FIGURE	
NO.      ISSUE/DESCRIPTION      BY      DATE												DESIGNED BY: JR		DRAWN BY: MDK		SCALE: AS SHOWN		REVISION NO.	
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### NOTES:

1. BASE IMAGE DOWNLOADED FROM GOOGLE EARTH PRO.
2. THE SIZE AND LOCATION OF EXISTING SITE FEATURES SHOULD BE CONSIDERED APPROXIMATE.
3. SITE INSPECTION CONDUCTED ON 11-22-2019.

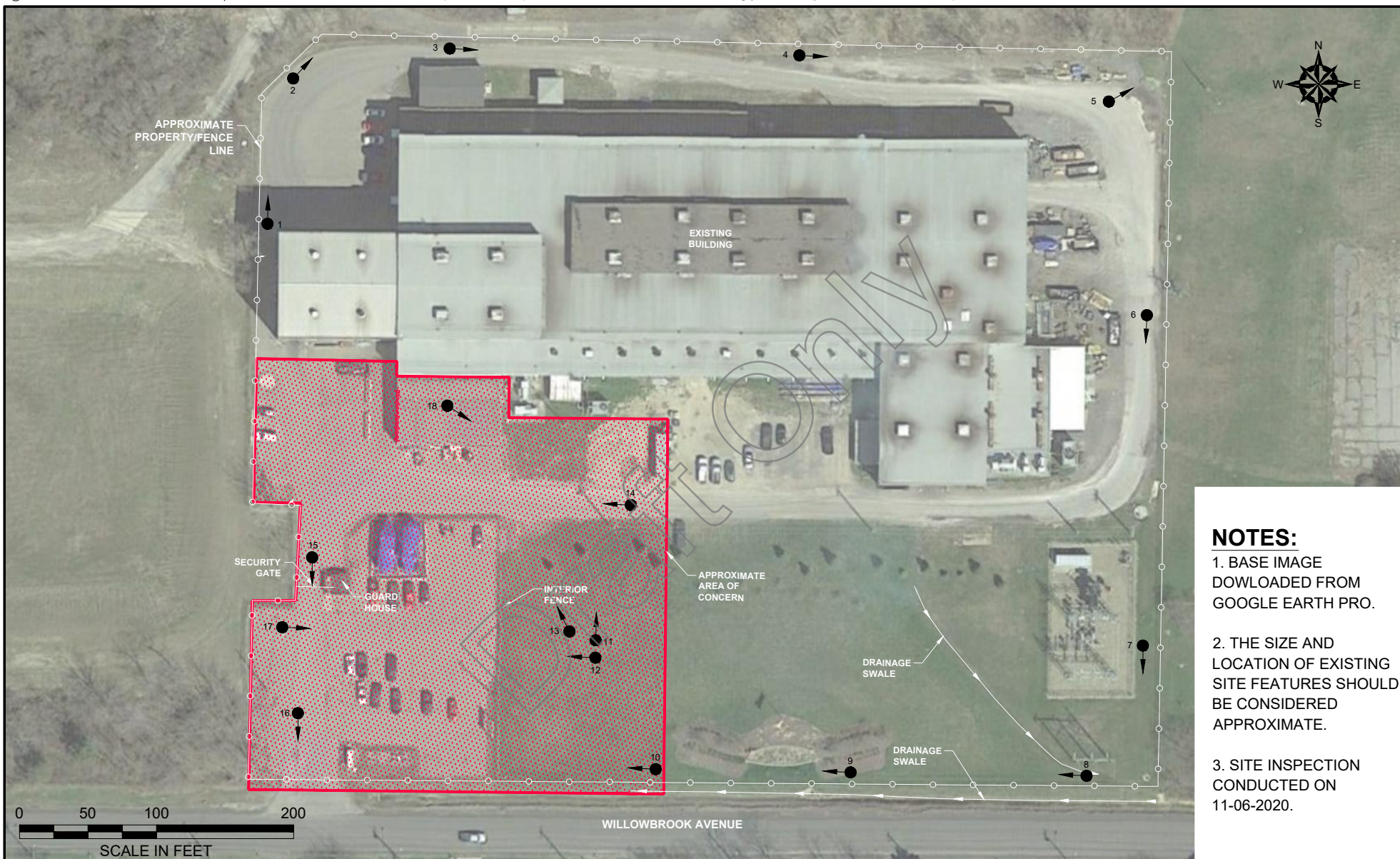
NO.	ISSUE/DESCRIPTION	BY	DATE
UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF GZA GEOENVIRONMENTAL, INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY GZA'S CLIENT OR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY THE CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA.			

SPECIAL METALS CORPORATION  
100 WILLOWBROOK AVENUE  
DUNKIRK, NEW YORK

**NOVEMBER 22, 2019**  
**SITE INSPECTION PHOTO LOCATIONS**

PREPARED BY: <b>GZA</b> GeoEnvironmental of NY Engineers and Scientists www.gza.com		PREPARED FOR: SPECIAL METALS CORPORATION	
PROJ MGR: TB	REVIEWED BY: BAK	CHECKED BY:	FIGURE
DESIGNED BY: JR	DRAWN BY: DEW	SCALE: AS SHOWN	3A
DATE: NOVEMBER 2019	PROJECT NO. 21.0056196.51	REVISION NO.	

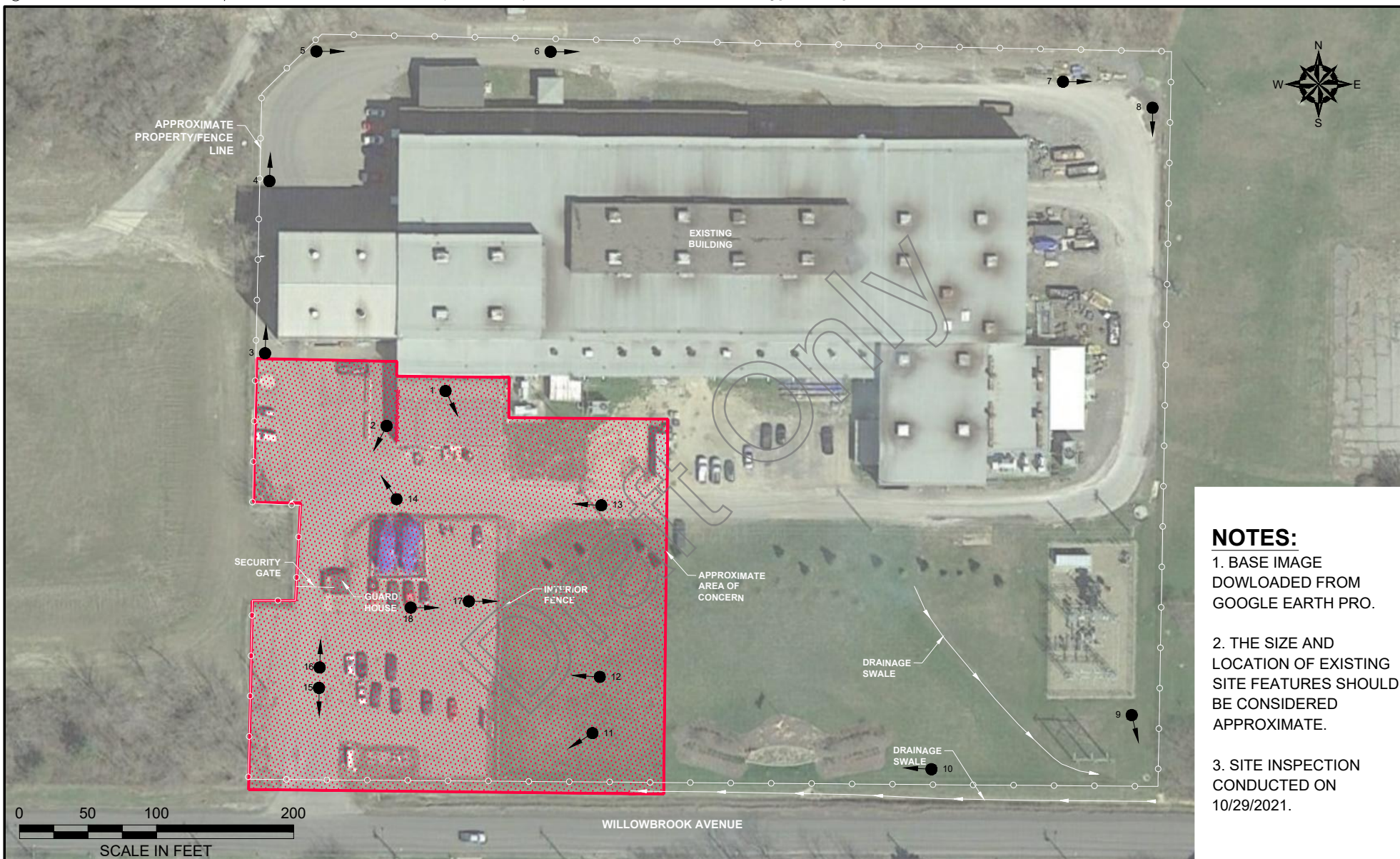




- NOTES:**
1. BASE IMAGE DOWNLOADED FROM GOOGLE EARTH PRO.
  2. THE SIZE AND LOCATION OF EXISTING SITE FEATURES SHOULD BE CONSIDERED APPROXIMATE.
  3. SITE INSPECTION CONDUCTED ON 11-06-2020.

SPECIAL METALS CORPORATION 100 WILLOWBROOK AVENUE DUNKIRK, NEW YORK				PREPARED BY: <b>GZA</b> GeoEnvironmental of NY Engineers and Scientists www.gza.com		PREPARED FOR: SPECIAL METALS CORPORATION	
<b>NOVEMBER 6, 2020</b> <b>SITE INSPECTION PHOTO LOCATIONS</b>				PROJ MGR: TB DESIGNED BY: JR DATE: NOVEMBER 2020	REVIEWED BY: BAK DRAWN BY: MDK PROJECT NO. 21.0056196.51	CHECKED BY: SCALE: AS SHOWN REVISION NO.	<b>FIGURE 3B</b>
<small>UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF GZA GEOENVIRONMENTAL, INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY GZA'S CLIENT OR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY THE CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA.</small>							





### NOTES:

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3. SITE INSPECTION CONDUCTED ON 10/29/2021.

NO.	ISSUE/DESCRIPTION	BY	DATE

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SPECIAL METALS CORPORATION  
100 WILLOWBROOK AVENUE  
DUNKIRK, NEW YORK

**OCTOBER 29, 2021**  
**SITE INSPECTION PHOTO LOCATIONS**

PREPARED BY: <b>GZA</b> GeoEnvironmental of NY Engineers and Scientists www.gza.com		PREPARED FOR: SPECIAL METALS CORPORATION	
PROJ MGR: JR	REVIEWED BY: BAK	CHECKED BY:	FIGURE <b>3C</b>
DESIGNED BY: JR	DRAWN BY: MDK	SCALE: AS SHOWN	
DATE: NOVEMBER 2021	PROJECT NO. 21.0056196.51	REVISION NO.	



**APPENDIX A    AOC INSPECTION FORMS**

SITE MANAGEMENT PLAN  
SPECIAL METALS CORPORATION  
DUNKIRK, NEW YORK

NAME: <u>Jim Richert</u>	INSPECTION TIME <u>12:45 PM</u>	
DATE: <u>22-Nov-19</u>	WEATHER: <u>Cloudy, 36 F, wind WSW at 10 to 20 MPH</u>	
<b>VISUAL INSPECTION CHECKLIST</b>		
Visually Inspected Area of Concern	<b>YES</b> NO	
Photographic Documentation	<b>YES</b> NO	
Is asphalt in parking lot in need of repair?	YES <b>NO</b> If YES, explain in next section.	
Is asphalt inside security fence in need of repair?	<b>YES</b> NO If YES, explain in next section.	
Is the security fence in need of repair?	YES <b>NO</b> If YES, explain in next section.	
Is grass cover in need of repair?	YES <b>NO</b> If YES, explain in next section.	
Is floor in Maintenance Shop in need of repair?	YES <b>NO</b> If YES, explain in next section.	
Other issues of concern identified?	YES <b>NO</b> If YES, explain in next section.	
Areas to be repaired are shown on attached figure	<b>YES</b> NO	
<b>AREAS IN NEED OF REPAIR</b>		
Area discussed in this section must be shown on a figure and have photographic documentation.		
<p>One small area of asphalt located approximately 75-feet NNE of the guard house in need of repair.</p> <p style="text-align: center;">See Figure.</p>		
<b>INTRUSIVE ACTIVITIES PLANNED FOR AREA OF CONCERN</b>		
	<b>DATE</b>	<b>LOCATION</b>
None		
<b>ADDITIONAL NOTES &amp; COMMENTS</b>		
<p>Security fence is complete and in good condition.</p> <p>Healthy grass on soil cover system.</p> <p>See photo log.</p>		

**AREA OF CONCERN INSPECTION FORM**  
 SITE MANAGEMENT PLAN  
 SPECIAL METALS CORPORATION  
 DUNKIRK, NEW YORK

NAME: <u>Jim Richert</u>	INSPECTION TIME <u>10:45 AM</u>
DATE: <u>6-Nov-20</u>	WEATHER: <u>Sunny, 63 F, wind S/SW at 15 to 20 MPH</u>
<b>VISUAL INSPECTION CHECKLIST</b>	
Visually Inspected Area of Concern	<b>YES</b> NO
Photographic Documentation	<b>YES</b> NO
Is asphalt in parking lot in need of repair?	YES <b>NO</b> If YES, explain in next section.
Is asphalt inside security fence in need of repair?	YES <b>NO</b> If YES, explain in next section.
Is the security fence in need of repair?	YES <b>NO</b> If YES, explain in next section.
Is grass cover in need of repair?	YES <b>NO</b> If YES, explain in next section.
Is floor in Maintenance Shop in need of repair?	YES <b>NO</b> If YES, explain in next section.
Other issues of concern identified?	YES <b>NO</b> If YES, explain in next section.
Areas to be repaired are shown on attached figure	YES <b>N/A</b> NO
<b>AREAS IN NEED OF REPAIR</b>	
Area discussed in this section must be shown on a figure and have photographic documentation.	
No area in need of repair identified.	
<b>INTRUSIVE ACTIVITIES PLANNED FOR AREA OF CONCERN</b>	<b>DATE</b>
None	
<b>ADDITIONAL NOTES &amp; COMMENTS</b>	
Pavement in good condition.	
Security fence is complete and in good condition.	
Healthy grass on soil cover system.	
See photo log.	

**AREA OF CONCERN INSPECTION FORM**  
**SITE MANAGEMENT PLAN**  
**SPECIAL METALS CORPORATION**  
**DUNKIRK, NEW YORK**

NAME: <u>Jim Richert</u>	INSPECTION TIME <u>11:15 AM</u>	
DATE: <u>29-Oct-21</u>	WEATHER: <u>overcast, 55 F, wind East at 10 MPH</u>	
<b>VISUAL INSPECTION CHECKLIST</b>		
Visually Inspected Area of Concern	<b>YES</b> NO	
Photographic Documentation	<b>YES</b> NO	
Is asphalt in parking lot in need of repair?	YES <b>NO</b> If YES, explain in next section.	
Is asphalt inside security fence in need of repair?	<b>YES</b> NO If YES, explain in next section.	
Is the security fence in need of repair?	<b>YES</b> NO If YES, explain in next section.	
Is grass cover in need of repair?	YES <b>NO</b> If YES, explain in next section.	
Is floor in Maintenance Shop in need of repair?	YES <b>NO</b> If YES, explain in next section.	
Other issues of concern identified?	YES <b>NO</b> If YES, explain in next section.	
Areas to be repaired are shown on attached figure	<b>YES</b> NO	
<b>AREAS IN NEED OF REPAIR</b>		
Area discussed in this section must be shown on a figure and have photographic documentation.		
<p>Two small areas of asphalt in need of repair located along east side of the site entrance road, between the entrance gate and the security building: See Photo # 15 and # 16</p> <p>Some cracks in pavement in parking lot. No subbase exposed yet. Preventative sealing recommended. See Photo 18</p> <p>A closed/chained gate located along the east side of the parking lot has a significant gap that needs to be narrowed to prevent unauthorized access by trespassors: see Photo # 17</p>		
<b>INTRUSIVE ACTIVITIES PLANNED FOR AREA OF CONCERN</b>	<b>DATE</b>	<b>LOCATION</b>
None		
<b>ADDITIONAL NOTES &amp; COMMENTS</b>		
Besides the areas noted above, pavement is in good condition.		
Besides gap in gate mentioned above, security fence is complete and in good condition.		
Healthy grass on soil cover system.		
See photo log.		






**APPENDIX B   PHOTOGRAPH LOGS**



## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 1	<b>Date:</b> 11-22-19		
<b>Direction Photo Taken:</b>  South			
<b>Description:</b>  Damaged pavement between the repair shop and guard house.			

<b>Photo No.</b> 2	<b>Date:</b> 11-22-19	
<b>Direction Photo Taken:</b>  North		
<b>Description:</b>  Western Site Fence.		





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 3	<b>Date:</b> 11-22-19	 A photograph showing the northwest corner of the site fence. The fence is made of chain-link and runs along a paved area. There are patches of snow on the ground. In the background, there are bare trees and a building.	
<b>Direction Photo Taken:</b>  Northeast			
<b>Description:</b>  Northwest corner of site fence.			

<b>Photo No.</b> 4	<b>Date:</b> 11-22-19	 A photograph showing the eastern half of the northern site fence. The fence is made of chain-link and runs along a paved area. There are patches of snow on the ground. In the background, there are bare trees and a building.	
<b>Direction Photo Taken:</b>  East			
<b>Description:</b>  Eastern half of the northern site fence.			





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 5	<b>Date:</b> 11-22-19	 A photograph showing the northeastern corner of the site perimeter fence. The foreground is a paved area with some debris and a blue container. In the background, there are trees and industrial structures under a cloudy sky.	
<b>Direction Photo Taken:</b>  East			
<b>Description:</b>  Northeastern corner of the site perimeter fence.			

<b>Photo No.</b> 6	<b>Date:</b> 11-22-19	 A photograph showing the northern end of the eastern site perimeter fence. The foreground is a paved area with some debris. In the background, there are trees, a blue water tower, and industrial structures under a cloudy sky.
<b>Direction Photo Taken:</b>  South		
<b>Description:</b>  Northern end of eastern site perimeter fence.		





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 7	<b>Date:</b> 11-22-19		
<b>Direction Photo Taken:</b>  South			
<b>Description:</b>  Middle section of the eastern site perimeter fence.			

<b>Photo No.</b> 8	<b>Date:</b> 11-22-19	
<b>Direction Photo Taken:</b>  Southeast		
<b>Description:</b>  Southeastern corner of the site perimeter fence.		





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 9	<b>Date:</b> 11-22-19		
<b>Direction Photo Taken:</b>  West			
<b>Description:</b>  Middle section of the southern site perimeter fence.			

<b>Photo No.</b> 10	<b>Date:</b> 11-22-19	
<b>Direction Photo Taken:</b>  West		
<b>Description:</b>  Southwestern corner of site perimeter fence by grass covered soil mound.		







## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056190.50
<b>Photo No.</b> 11	<b>Date:</b> 11-22-19		
<b>Direction Photo Taken:</b>  Northwest			
<b>Description:</b>  Fence between the parking lot and the grass covered soil mound.			
<b>Photo No.</b> 12	<b>Date:</b> 11-22-19		
<b>Direction Photo Taken:</b>  North/northwest			
<b>Description:</b>  Northern slope of the grass covered soil mound.			





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056190.50
<b>Photo No.</b> 13	<b>Date:</b> 11-22-19		
<b>Direction Photo Taken:</b>  West			
<b>Description:</b>  Southern Site road.			
<b>Photo No.</b> 14	<b>Date:</b> 11-22-19		
<b>Direction Photo Taken</b> Southeast			
<b>Description:</b>  Concrete floor of the repair shop.			





## Photographic Log


<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056190.50
<b>Photo No.</b> 15	<b>Date:</b> 11-22-19		
<b>Direction Photo Taken:</b>  South			
<b>Description:</b>  Site entrance at guard house.			

<b>Photo No.</b> 16	<b>Date:</b> 11-22-19	
<b>Direction Photo Taken:</b>  East		
<b>Description:</b>  Paved parking lot.		





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056190.50
<b>Photo No.</b> 17	<b>Date:</b> 11-22-19		
<b>Direction Photo Taken:</b>  North			
<b>Description:</b>  Paved Parking Lot.			

<b>Photo No.</b> 18	<b>Date:</b> 11-22-19	
<b>Direction Photo Taken:</b>  South		
<b>Description:</b>  Site Entrance.		





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 1	<b>Date:</b> 11-6-2020		
<b>Direction Photo Taken:</b>  North			
<b>Description:</b>  Northern end of Western Site perimeter fence.			

<b>Photo No.</b> 2	<b>Date:</b> 11-6-2020	
<b>Direction Photo Taken:</b>  NNE		
<b>Description:</b>  NW corner of Site perimeter fence.		





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 3	<b>Date:</b> 11-6-2020		
<b>Direction Photo Taken:</b>  East			
<b>Description:</b>  Western end of northern Site perimeter fence.			


<b>Photo No.</b> 4	<b>Date:</b> 11-6-2020		
<b>Direction Photo Taken:</b>  East			
<b>Description:</b>  Eastern end of northern Site perimeter fence.			





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 5	<b>Date:</b> 11-6-2020		
<b>Direction Photo Taken:</b>  Northeast			
<b>Description:</b>  Northeastern corner of Site perimeter fence.			

<b>Photo No.</b> 6	<b>Date:</b> 11-6-2020	
<b>Direction Photo Taken:</b>  South		
<b>Description:</b>  Northern end of eastern Site perimeter fence.		





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 7	<b>Date:</b> 11-6-2020		
<b>Direction Photo Taken:</b>  South			
<b>Description:</b>  Southern end of eastern Site perimeter fence.			

<b>Photo No.</b> 8	<b>Date:</b> 11-6-2020		
<b>Direction Photo Taken:</b>  West			
<b>Description:</b>  Eastern end of southern Site perimeter fence.			





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 9	<b>Date:</b> 11-6-2020		
<b>Direction Photo Taken:</b>  West			
<b>Description:</b>  Central portion of southern Site perimeter fence.			



<b>Photo No.</b> 10	<b>Date:</b> 11-6-2020
<b>Direction Photo Taken:</b>  West	
<b>Description:</b>  Western end of the southern Site perimeter fence and grass cover.	

A photograph showing a grassy field with a chain-link fence running along the left side. In the background, there are trees with autumn foliage, a residential house, and a large sign for "SPECIAL METALS". The sign is white with blue text and a logo. The field is green and appears to be well-maintained. The sky is clear and blue.






## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056190.51
<b>Photo No.</b> 11	<b>Date:</b> 11-6-2020	 A photograph showing a large, grass-covered mound in the foreground. In the background, there is a large, multi-story industrial building with a corrugated metal roof and several windows. A few evergreen trees are planted in a row in front of the building. The sky is clear and blue.	
<b>Direction Photo Taken:</b>  north			
<b>Description:</b>  Grass-covered mounded area.			
<b>Photo No.</b> 12	<b>Date:</b> 11-6-2020	 A photograph showing a grass-covered mound in the foreground. In the background, there is a parking lot with several vehicles, including a black pickup truck and a white van. Beyond the parking lot, there are industrial buildings and trees with some autumn-colored leaves. The sky is clear and blue.	
<b>Direction Photo Taken:</b>  west			
<b>Description:</b>  Eastern parking lot fence and grass cover on western side of mounded area.			





## Photographic Log


<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056190.51
<b>Photo No.</b> 13	<b>Date:</b> 11-6-2020		
<b>Direction Photo Taken:</b>  northwest			
<b>Description:</b>  Grass-covered mound and NE corner of parking lot fence.			
<b>Photo No.</b> 14	<b>Date:</b> 11-6-2020		
<b>Direction Photo Taken</b> west			
<b>Description:</b>  Paved Site road.			





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056190.51
<b>Photo No.</b> 15	<b>Date:</b> 11-6-2020		
<b>Direction Photo Taken:</b>  South			
<b>Description:</b>  Paved Site entrance road.			

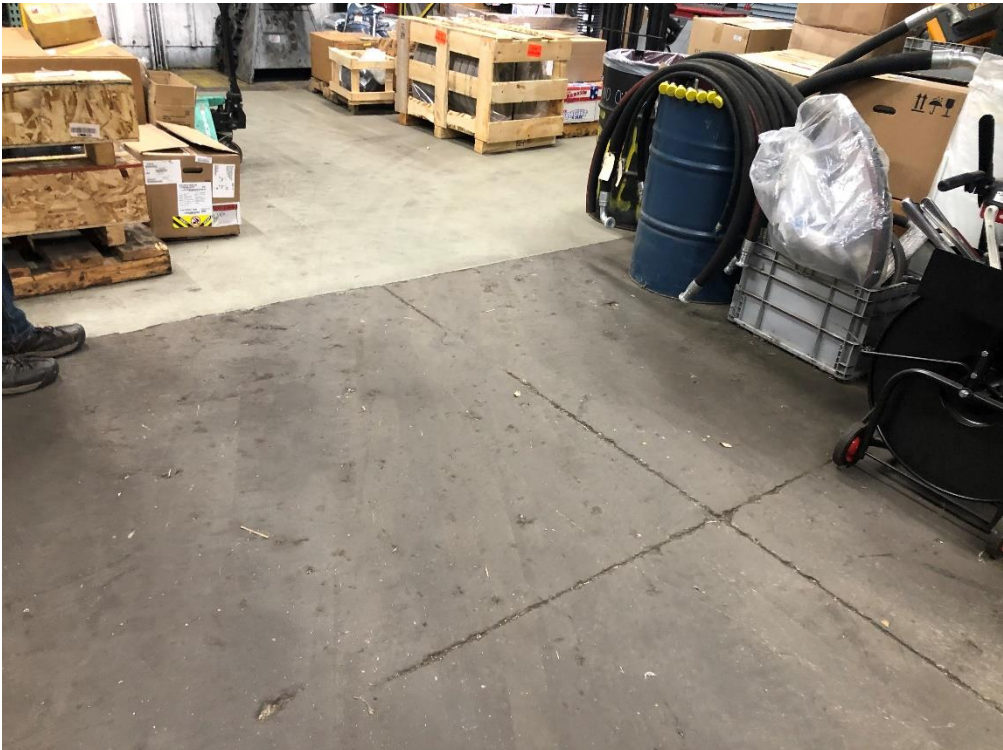
<b>Photo No.</b> 16	<b>Date:</b> 11-6-2020	
<b>Direction Photo Taken:</b>  south		
<b>Description:</b>  Paved Site entrance.		





## Photographic Log


<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056190.51
<b>Photo No.</b> 17	<b>Date:</b> 11-6-2020		
<b>Direction Photo Taken:</b>  east			
<b>Description:</b>  Paved Site parking lot.			


<b>Photo No.</b> 18	<b>Date:</b> 11-6-2020	
<b>Direction Photo Taken:</b>  southeast		
<b>Description:</b>  Concrete floor inside of the facility repair shop.		





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 1	<b>Date:</b> 10-29-2021		
<b>Direction Photo Taken:</b>  Southeast			
<b>Description:</b>  Floor of maintenance shop.			

<b>Photo No.</b> 2	<b>Date:</b> 10-29-2021	
<b>Direction Photo Taken:</b>  South		
<b>Description:</b>  Repaired pavement (foreground) and security building (background)		





# Photographic Log


<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 3	<b>Date:</b> 10-29-2021		
<b>Direction Photo Taken:</b>  North			
<b>Description:</b>  Western Site perimeter road and fence.			

<b>Photo No.</b> 4	<b>Date:</b> 10-29-2021	
<b>Direction Photo Taken:</b>  North		
<b>Description:</b>  North extent of the western site perimeter fence.		





## Photographic Log


<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 5	<b>Date:</b> 10-29-2021		
<b>Direction Photo Taken:</b>  East			
<b>Description:</b>  Western extent of the northern site perimeter fence.			

<b>Photo No.</b> 6	<b>Date:</b> 10-29-2021		
<b>Direction Photo Taken:</b>  East			
<b>Description:</b>  Central area of the northern site perimeter fence.			





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 7	<b>Date:</b> 10-29-2021		
<b>Direction Photo Taken:</b>  East			
<b>Description:</b>  Northeastern corner of the site perimeter fence.			

<b>Photo No.</b> 8	<b>Date:</b> 10-29-2021	
<b>Direction Photo Taken:</b>  South		
<b>Description:</b>  Northern extent of the eastern site perimeter fence.		





## Photographic Log


<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056196.51
<b>Photo No.</b> 9	<b>Date:</b> 10-29-2021		
<b>Direction Photo Taken:</b>  South			
<b>Description:</b>  Southeastern corner of the site perimeter fence.			

Photo No. 10	Date: 10-29-2021	
Direction Photo Taken:  West		
Description:  Central area of the southern site perimeter fence.		





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056190.51
<b>Photo No.</b> 11	<b>Date:</b> 10-29-2021		
<b>Direction Photo Taken:</b>  Southwest			
<b>Description:</b>  Grass-covered soil mound of the eastern area of concern (AOC) with parking lot in the background.			

<b>Photo No.</b> 12	<b>Date:</b> 10-29-2021	
<b>Direction Photo Taken:</b>  West		
<b>Description:</b>  View from the east of the soil covered mound and paved parking lot.		





## Photographic Log


<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056190.51
<b>Photo No.</b> 13	<b>Date:</b> 10-29-2021		
<b>Direction Photo Taken:</b>  West			
<b>Description:</b>  Interior paved site road.			

<b>Photo No.</b> 14	<b>Date:</b> 10-29-2021	
<b>Direction Photo Taken</b> Northwest		
<b>Description:</b>  Repaired pavement of Site Road identified last year to need repair.		





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056190.51
<b>Photo No.</b> 15	<b>Date:</b> 10-29-2021		
<b>Direction Photo Taken:</b>  South			
<b>Description:</b>  One of two small areas of pavement in need of repair at the site entrance. Subbase stone exposed.			

<b>Photo No.</b> 16	<b>Date:</b> 10-29-2021	
<b>Direction Photo Taken:</b>  North		
<b>Description:</b>  Second of two small areas of pavement in need of repair on the site entrance road. Subbase stone exposed.		





## Photographic Log

<b>Client Name:</b> Special Metals Corp.		<b>Site Location:</b> SMC Facility, Dunkirk, NY	<b>Project No.</b> 21.0056190.51
<b>Photo No.</b> 17	<b>Date:</b> 10-29-2021		
<b>Direction Photo Taken:</b>  East			
<b>Description:</b>  Gap between fence and gate needing repair (reduction). Located directly east of the parking lot.			

<b>Photo No.</b> 18	<b>Date:</b> 10-29-2021	
<b>Direction Photo Taken:</b>  East		
<b>Description:</b>  Minor cracks in pavement of parking lot. Preventative maintenance suggested before subbase becomes exposed.		



**APPENDIX C    IC/EC CERTIFICATION FORM**





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



Site No. 907031 Site Details Box 1

Site Name Special Metals Corporation

Site Address: 100 Willowbrook Avenue Zip Code: 14048  
City/Town: Dunkirk  
County: Chautauqua  
Site Acreage: 2.000

Reporting Period: February 08, 2019 to February 08, 2022

	YES	NO
1. Is the information above correct?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	-------------------------------------

Box 2

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Are all ICs in place and functioning as designed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 Controls**Parcel**96.10-1-2**Owner

David Murray, Mgr. of Env. Affairs

Institutional Control

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

The Area Of Concern has a series of Institutional Controls in the form of site restrictions. Adherence to these Institutional Controls is required by the Environmental Easement. Site restrictions that apply to the Controlled Property are:

- Vegetable gardens and farming, including cattle and dairy farming, on the property are prohibited;
- The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended purpose;
- Future activities on the property that will disturb remaining contaminated material are prohibited unless they are conducted in accordance with this SMP;
- The property may only be used for commercial and/or industrial use provided that the long-term Engineering and Institutional Controls included in this SMP are employed.
- The property may not be used for a less restrictive use without additional remediation or an amendment of the Environmental Easement.

**Description of Engineering Controls**Parcel**96.10-1-2**Engineering Control

Cover System  
 Fencing/Access Control

Cover System comprised of a minimum of 12 inches of crushed stone covered by either clean topsoil, asphalt pavement, concrete-covered sidewalks, and/or concrete building slabs.

Site Security System comprised of a minimum 8-foot high chain link security fence around the Area Of Concern and SMC facility with the exception of a 60-foot section that is the main driveway access point to the SMC facility parking lot from Willowbrook Avenue in the southwestern corner of the property.



**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. 907031

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 Craig Romanowski at 100 Willowbrook Ave, Dunkirk NY 14048  
print name print business address

am certifying as Designated Representative (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

3/9/22  
Date



## EC CERTIFICATIONS

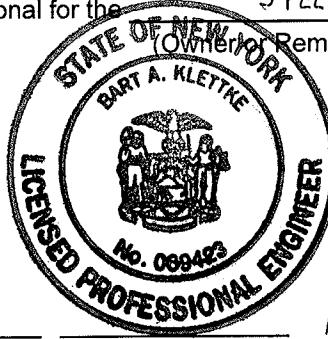
Box 7

### Qualified Environmental Professional 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 BART A. KLETTE at 300 PEARL STREET, BUFFALO, NY 14202,  
print name print business address

am certifying as a Qualified Environmental Professional for the SPECIAL METALS CORPORATION  
(Owner or Remedial Party)



Bart A. Klette

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

Stamp  
(Required for PE)

MARCH 9, 2022  
Date



GZA GeoEnvironmental, Inc.