

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

CORPORATE ENVIRONMENTAL, HEALTH AND SAFETY

PROCEDURE

MANAGEMENT OF CHANGE

CEHSP A11.01 – Environmental Site Assessments

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1.0 PURPOSE

IT IS THE POLICY OF CON EDISON TO COMPLY WITH ALL FEDERAL, STATE, AND LOCAL REGULATIONS PERTAINING TO THE **MANAGEMENT OF CHANGE, ENVIRONMENTAL SITE ASSESSMENTS**. An environmental site assessment (“ESA”) is used to determine the likely presence of hazardous substances or petroleum products (“contamination”) in or on structures, soil, ground, groundwater, or surface waters. The purpose of this procedure is to provide the framework to identify hazardous substances or petroleum on existing Con Edison property or facilities, or on property or facilities that Con Edison seeks to purchase (“sites”).

2.0 APPLICABILITY

This Corporate Environmental, Health and Safety Procedure (CEHSP) applies to all Con Edison operating and engineering departments. ESAs must be conducted before:

- Major modification of sites (a major modification is a physical change to a facility that includes but is not limited to construction, excavation, or filling);
- Sale of sites; or
- Purchase of sites.

However, this procedure does not apply to removal actions or spill response environmental investigations and site activities required by various federal, state, and local agencies on a case-by-case basis in accordance with the Comprehensive Environmental Response, Compensation

and Liability Act (CERCLA), the Superfund Amendments and Reauthorization Act (SARA), the Resource Conservation and Recovery Act (RCRA), or similar New York State laws.

Note: Under Section II of Con Edison's 2006 Consolidated Order on Consent with the New York State Department of Environmental Conservation (NYSDEC), Con Edison is addressing the environmental effects of certain discharges of petroleum products at Con Edison facilities. This CEHSP does not apply to remedial actions addressed in the Order.

3.0 INTRODUCTION

The potential liability associated with contamination at sites poses a serious risk to Con Edison. To minimize potential liability, Con Edison must conduct ***all appropriate inquiries*** ("AAI") into the environmental concerns at the sites. The type and scope of environmental investigations potentially required depend on various factors, including the federal, state, and local agencies having jurisdiction over the site and the scope of the proposed project.

Note: ESAs addressed under this CEHSP are not ***environmental audits***, which are addressed under other procedures. An ESA is a limited investigation that focuses on potential environmental contamination from past or current activities; an audit is a detailed evaluation of a facility that considers operating and administrative procedures to evaluate environmental, health, and safety regulatory compliance.

4.0 COMPLIANCE REQUIREMENTS

4.1 OVERVIEW OF ENVIRONMENTAL SITE ASSESSMENT PROCESS

There are no regulatory requirements mandating ESAs or specifying how they must be done. However, the United States Environmental Protection Agency ("USEPA") has published "standards of care" for Phase I Environmental Site Assessments that are contained in its AAI rule. Conducting an ESA according to these standards affords purchasers of real property certain legal protections, including the innocent landowner defense, if contamination is later discovered at the site. Where major modifications are proposed at a site, conducting an ESA according to these standards of care helps ensure that potential environmental problems are identified and addressed before the project commences, thereby managing potential project delays and potential liability risks.

Con Edison has developed standard nomenclature for ESAs that conforms to the USEPA's AAI rule and the American Society for Testing and Materials ("ASTM") Standard E1527-13. Although USEPA's AAI rule and ASTM Standard E1527-13 are used in this CEHSP to establish a framework for ESAs, every ESA does not have to strictly comply with the rule and standard; an ESA may be developed on a project-specific basis.

An ESA can be divided into three major phases.

- **Phase I:** As reflected in the USEPA AAI rule and ASTM Standard E1527-13, the purpose of a Phase I ESA is to identify, to the extent practicable, recognized environmental conditions at a particular site. A Phase I ESA typically consists of a visual site inspection, a review of the historical and current activities conducted at the site, a review of existing corporate records, and a search of commercially available databases to assess the potential impact of activities at the site or from adjacent or nearby properties. The records to be reviewed include existing environmental permits and internal and external correspondence pertaining to the operation of the facility. The review also considers other unique environmental features that may impact this evaluation. The key

objective of the first phase is to identify potential environmental contamination or risks associated with the site that suggest potential environmental impacts and assess the need for additional studies, investigations, or sampling to fill data gaps (i.e., Phase II).

- **Phase II:** A Phase II ESA builds on the information obtained in Phase I and involves the investigation, sampling, and analysis of suspected potential contaminated media (e.g., soil and groundwater). The objective of Phase II is to determine whether contamination is present at the site and identify the probable source(s) of contamination.
- **Phase III:** Phase III consists of the following activities:
 - Determining the vertical and horizontal extent of soil contamination and the degree of groundwater or surface water contamination both on-site and off-site;
 - Evaluating remediation alternatives for the cleanup of site contamination;
 - Selecting and designing of the preferred remedial alternative; and
 - Bidding, constructing, and implementing the chosen cleanup method.

When performing a Phase I ESA, the USEPA's AAI Rule and the current ASTM Standard (E1527-13) impose numerous requirements:

- **Environmental Professional Qualifications and Certification Statement:** the person performing the due diligence, referred to as the Environmental Professional ("EP") must:
 - Be a licensed Professional Engineer or Professional Geologist with at least three years of relevant experience, or
 - Hold a government license to perform environmental inquiries with at least three years of relevant experience, or
 - Have a baccalaureate (or higher) degree in engineering, environmental science or earth science with at least five years of relevant experience, or
 - Have at least 10 years of relevant experience; and,
 - Remain current in his/her field through participation in continuing education or other activities and be able to demonstrate such efforts.

Additionally, the Phase I report must include certification statements signed by the EP.

- **Interviews:** interviews must be conducted with present and past **owners** and occupants of the subject property. If a property is abandoned, the owners and occupants of neighboring properties must be interviewed.
- **Inspections:** an inspection of both the subject site and adjoining properties must be performed. When access to the site and/or adjoining properties cannot be gained, good faith efforts to acquire access must be documented in the report.
- **Site History:** the site's history must be researched back to the property's first developed use. That is, if the site was first developed in 1960, the site's history must be researched back to 1960. Any additional historical research is at the discretion of the EP.
- **Institutional and Engineering Controls:** all properties within a one-half mile radius of the site must be identified to determine if there are any institutional or engineering controls and, if so, whether the owner/operator is complying with all such controls. [The ASTM standard refers to such controls as Activity and Use Limitations (AULs)].

- **Data Gaps:** Any of the above requirements that cannot be directly addressed during the due diligence must be identified, explained, and documented as "Data Gaps" within the Phase I report.
- **Data Failure:** A failure to achieve the historical research objectives of the ESA even after reviewing the standard historical research sources that are reasonably ascertainable and likely to be useful. Data failure is a type of data gap and must be noted in the Phase I report.
- **Expiration:** Phase I reports are valid for one year after completion. However, some of the components expire after 180 days, requiring an update, if necessary.
- **Specialized Knowledge or Experience:** the report must include specialized knowledge or experience concerning the site. In other words, if someone is particularly familiar with the property or facility (e.g., longtime employee of the facility) and can provide specialized knowledge concerning usage of the property, that information is expected to be included in the ESA.

Note: If during the course of a Phase I ESA visual site inspection, a release or contamination is discovered, it must be reported per [CEHSP E10.01](#), *Release Reporting*. Depending on the extent of contamination or release, it may have to be reported to government agencies, (e.g., USEPA, NYSDEC, New York City Department of Environmental Protection [NYCDEP]). Depending on the circumstances, these agencies may require Con Edison to remediate the contamination or perform additional investigation.

The basic components of an ESA are the same regardless of whether the project involves modification, sale, or purchase of sites. However, implementation of these components may differ depending on the type of project. Accordingly, the remainder of the Compliance Requirements discussion is divided into two sections: Section 4.2 covers ESAs required in conjunction with modification or sale of Con Edison sites; and Section 4.3 covers ESAs required in conjunction with Con Edison's purchase of sites.

4.2 ENVIRONMENTAL SITE ASSESSMENTS ASSOCIATED WITH FACILITY CHANGES OR PROPERTY DIVESTITURE

The EH&S Remediation Department should be consulted during the initial planning stages of an ESA.

4.2.1 Phase I

Historical Site Conditions

Site property records from existing Con Edison files regarding the past and current uses of the property must be reviewed. This review must evaluate the predevelopment years and examine conditions before first development, which may be more than 50 years in the past. The review also must examine past operations to determine whether potentially hazardous materials might have been used, stored, and transported at the site. Additional inquiry must include interviews with specific operating personnel to gain added perspective on historical conditions. Available site and **aerial photographs** of the site should be obtained to supply a complete understanding of the site. Photographic interpretation provides visual evidence of dumping, landfilling, or other hazardous materials operations on the site and adjacent properties that may affect the site's environmental integrity. **Fire insurance maps** (i.e., Sanborn Maps) and information found in the Con Edison historical archives may also help in completing this review. Key Con Edison

personnel who may have some knowledge of the site history must be identified and, if available, interviewed to gather their knowledge of the site.

Con Edison Records Review

This activity must include a review of Con Edison files including the regulatory permits that exist for each site, internal and external memoranda and correspondence, and any property encumbrances including deed restrictions, easements, and rights-of-way. In the event that files are not complete or additional information is needed, Con Edison may need to file a Freedom of Information Act (FOIA) request with federal, state, and local agencies for the subject site to complete this aspect of the review. A commercially available database search is also useful in developing an understanding of the site and adjacent properties that may affect the site.

Visual Site Inspection

The visual site inspection must consist of examining the site for evidence of potential past and current areas of environmental concern. These include but are not limited to:

- Identification of potential pathways by which petroleum products or hazardous substances may have migrated to or from the site.
- Confirmation of environmental incidents, violations, permits, and regulatory enforcement actions obtained during the records review.
- Evidence of filling, blasting, or current or historic excavation at the site.
- Visible condition of all surface waters, point source discharges, and outlets existing at the site.
- Visible condition of environmentally sensitive areas (e.g., wetlands).
- Obvious signs of surface contamination such as discolored soil, stressed vegetation, and spills.
- Confirmation of the location of aboveground and underground storage tanks, vents, and vent stacks.
- Inspection of hazardous materials storage areas inside and outside the building.
- Confirmation of transformers and other electrical equipment containing polychlorinated biphenyls (PCBs), including both historic and current practices.
- Inspection of all storm water discharge outfalls, sanitary sewer pump stations and collection pits, interior floor drains and **sumps**, and other pretreatment wastewater systems (e.g., oil/water separators, pH adjustment pits).
- A visual assessment of potential soil vapor intrusion issues and potential soil vapor migration pathways both onto and from the property.

4.2.2 Phase II

The objective of the Phase II investigation is to assess the potential areas of environmental concern identified in Phase I with respect to potential impacts to human health and the environment. Laboratory analytical data interpretation is the primary tool to accomplish this

objective. If contamination is not detected or if it exists at concentrations below applicable regulatory levels and agency guidelines, the ESA may be discontinued. If contamination is present above applicable regulatory cleanup levels or agency guidelines, a Phase III may be warranted. The information contained in Phase II must, at a minimum, include the following.

- The nature and general extent of detected contamination;
- The media contaminated (soil, sediment, surface water, and/or groundwater); and
- The type of contaminant and source of the contamination.

Preparation of the Phase II Field Investigation

The first step in the Phase II field investigation is to prepare a field-sampling plan, which is based on the historical site information and field observations obtained during Phase I. Sampling locations of soil, sediment, surface water, and groundwater are determined for each of the areas of environmental concern identified in Phase I. A written site-specific health and safety plan (HASP), which addresses potential health and safety concerns encountered during field activities, must be included in the field sampling plan or provided as a separate document. This HASP will ensure that worker safety during all field activities (i.e., drilling, sampling) is considered since workers may encounter hazardous materials.

The field-sampling plan must include the number and depth of the actual sampling locations, and analytical test methods. The plan must also identify the sample acquisition procedures to be used by field personnel to collect samples. [Refer to the ChemLab *Field Test Manual* for sampling procedures for specific media (i.e., air, water, and soil).] The plan should also identify how the coordination of subcontractors (i.e., drilling, surveying) will be accomplished and which permits and site utility clearances are required prior to the initiation of sampling. The acceptance of this plan and subsequent phases must be coordinated through local EH&S staff in consultation with EH&S Remediation, if necessary.

Sample Collection

The method of sample collection depends on the location of the sampling point, the media to be sampled, and the depth of sampling. Sample collection points must not be located until an appropriate check is made to ensure that underground utilities are not present in the area of investigation. Sampling methods include, but are not limited to: hand tools for shallow soil sampling; drill rig or test pits for deep soil sampling; or groundwater monitoring wells created by drilling equipment for groundwater sampling. Groundwater sampling may also be accomplished by using direct push methods known as hydropunch or geoprobe, whereby a small-diameter well point is driven into the subsurface and a soil sample and/or a groundwater sample is extracted without the use of a monitoring well. Samples collected must be properly labeled and transported in a cooler maintained at a temperature of 4°C to the laboratory using proper chain-of-custody documentation.

Laboratory Analysis

The conclusions of the field investigation must be based on the results of the laboratory analysis. The laboratory analyzes the samples, using the methods necessary for the type of contamination suspected (refer to the ChemLab *Field Sampling Manual*). In addition, the laboratory must be certified by the New York State Department of Health to perform the analyses. After the laboratory results are received, a report must be generated based on the amounts of contamination detected and comparison to applicable regulatory levels and agency guidelines. If

contamination is confirmed, the Operating Department, in conjunction with EH&S, Remediation and the Law Department, must decide whether to proceed to Phase III.

4.2.3 Phase III

While the Phase II field program screens for the presence or absence of contamination, Phase III establishes the vertical and horizontal extent of contamination identified. A Phase III assessment must be conducted if contamination has been identified above applicable regulatory cleanup levels or agency guidelines.

Cleanup does not occur until the magnitude or extent of contamination is known in order to evaluate the appropriate remedial action. Factors that will affect the selection of the preferred remedial alternative include cost, time, amount and location of the contamination, the contaminant, the contaminated medium, sources likely to be affected by the contamination, soil characteristics, air quality conditions, geology, and hydrogeology. Once these factors are developed and understood, EH&S Remediation, with the assistance of the operating departments, can obtain from the outside subcontractor a conceptual remedial site model in order to evaluate effective and appropriate remedial technologies, and to design and implement the preferred selected remedial alternative.

4.3 ENVIRONMENTAL SITE ASSESSMENTS ASSOCIATED WITH PURCHASING OF SITES

ESAs are typically conducted as part of environmental **due diligence** (also referred to as all appropriate inquiry) when Con Edison is considering the purchase of a site. The request for an acquisition ESA is generally initiated by Con Edison's Real Estate Department. EH&S is responsible for determining whether an ESA is necessary, the implementation of the assessment, and the recommendation for further study, site remediation, or indemnification from prospective sellers. (See [Corporate Instruction CI-210-2](#) Responsibilities of Company Organizations for Acquisition, Disposition, and Administration of Real Estate.)

4.3.1 Phase I

Historical Site Conditions

A review of the available property records (**chain of title**), which includes past and current ownership of the site, must be conducted. To assemble this information in an orderly fashion, the owner or operator can be provided with a Pre-visit Questionnaire, which documents the due diligence inquiry into the site's history. The information requested evaluates the predevelopment years and examine conditions to first development, which may be more than 50 years into the past. Past operations must be examined to determine whether potentially hazardous materials might have been used, stored, and transported on the site. Inquiry also may include interviews with specific operating personnel to gain added perspective on historical conditions. Available site and aerial photographs of the site must be obtained to create a complete understanding of the site. Photographic interpretation provides visual evidence of dumping, landfilling, or other hazardous materials operations on the site and adjacent properties, which may affect the environmental integrity of the real estate property. Fire insurance maps (i.e., Sanborn Maps) and historical records from local historical societies may also be helpful in completing this review. The owner and current tenants of the property who may have some knowledge of the site history must be identified and inquiries made. Although it is desirable to obtain site information from the current site owner/employees by questionnaire and/or interviews, the owner may not wish to provide such information. Nevertheless, as much information as possible concerning the site's history and past and present uses must be obtained within the project's time constraints during the Phase I ESA.

Regulatory Agency Records Review

For acquisitions, this activity includes a review of regulatory agency records to identify active or abandoned hazardous material activities at the subject site and adjacent properties that may impact the site. These agencies' records include, but may not be limited to, those from the USEPA, the **National Priorities List**, the USEPA **Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)**, the USEPA Resource Conservation and Recovery Act Information System (RCRIS) for hazardous waste generators or transporters, the NYSDEC, and the NYCDEP. Additionally, the New York City Fire Department must be contacted and records associated with underground storage tanks on the property or adjacent properties within a 1-mile radius must be reviewed. A commercially available database search is also useful in developing an understanding of properties being considered for purchase and adjacent properties that may affect the subject property.

Visual Site Inspection

For a discussion of the visual inspection process, see Section 4.2.1 above.

4.3.2 Phase II

For a discussion of the objectives of a Phase II ESA, see Section 4.2.2 above. In the case of purchase of a site, a Phase II is initiated only after the results of the Phase I are discussed with the owner of the subject site and the screening of the site has identified potential contamination or recognized environmental conditions. Once an agreement is reached between the parties on cost and site accessibility, the Phase II can be implemented.

Note: The discovery of contamination or an historic spill may trigger a reporting requirement on the part of the owner of the site. It is imperative that the owner of the site be aware of this potential reporting obligation and be willing to report such findings. In a situation of a reportable discovery of contamination, if the owner of the site refuses to report, Con Edison is obligated to report the condition.

Preparation of the Phase II Field Investigation

For a discussion of the process of preparing a Phase II field investigation, see section 4.2.2 above. The acceptance of field sampling plans and subsequent phases for site acquisitions must be coordinated through EH&S, Remediation.

Sample Collection

For a discussion of sample collection, see section 4.2.2 above.

Laboratory Analysis

For a discussion of laboratory analysis procedures, see section 4.2.2 above. If contamination is confirmed in conjunction with a property acquisition by Con Edison, the Real Estate Department responsible for the transaction, in conjunction with EH&S Remediation and the Law Department, must decide whether to continue to Phase III or terminate the investigation.

4.3.3 Phase III

While the Phase II field program screens for the presence or absence of contamination, Phase III establishes the vertical and horizontal extent of the contamination. The Phase III investigation occurs only after the Phase II investigation is complete and the findings have been disclosed to

the seller of the subject site. If contamination has been identified above applicable regulatory cleanup levels or agency guidelines, agreement on the costs of the Phase III effort is negotiated prior to the implementation of Phase III.

Cleanup does not occur until the magnitude or extent of contamination is known in order to evaluate the appropriate remedial action. Factors that will affect the selection of the preferred remedial alternative include Con Edison's proposed use of the site, cost, time, volume and location of the contamination, the contaminant, the contaminated medium, sources likely to be affected by the contamination, soil characteristics, air quality conditions, geology, and hydrogeology. Once these factors are developed and understood, the Real Estate Department, with the assistance of EH&S Remediation, can obtain from Con Edison's environmental consultant a conceptual site remediation model to evaluate effective and appropriate remedial technologies and associated cost estimates and, if appropriate, to design and implement the selected remedial alternative.

During the ESA process or after the ESA is completed, the transaction can either proceed or be terminated, considering the ESA results and business needs.

5.0 DEFINITIONS

Aerial Photographs: Photographs of areas encompassing the property taken from an airplane or helicopter at a low enough altitude to allow identification of development and activities.

All Appropriate Inquiry: Inquiry, consistent with good commercial or customary practice into the previous ownership and uses of the property and as defined in CERCLA, 42 USC 9601(35)(B), that will give a party to a commercial real estate transaction the innocent landowner defense to CERCLA liability [42 USC 9601(A) and (B) and 9607(b)(3)].

Chain of Title: Records of fee ownership, leases, land contracts, easements, liens, and other encumbrances on or of the property recorded in the place where land title records are, by law or custom, recorded for the local jurisdiction in which the property is located.

Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS): The list of sites compiled by USEPA that USEPA has investigated or is currently investigating for potential hazardous substance contamination for possible inclusion on the National Priorities List.

Controlled Recognized Environmental Condition (CREC): A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (as evidenced by the issuance of a no further action letter or equivalent) with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (e.g., institutional controls or engineering controls). CREC shall be listed in the findings section of the Phase I report.

Due Diligence: The process of inquiring into the environmental characteristics of a parcel of commercial real estate or other conditions, usually in connection with a commercial real estate transaction.

Environmental Audit: The investigative process to determine whether the operations of an existing facility are in compliance with applicable environmental laws and regulations.

Environmental Site Assessment (ESA): The process by which a person or entity seeks to determine whether a particular parcel of real property (including improvements) is subject to

recognized environmental conditions. At the option of the user, an ESA may include more inquiry than that constituting all appropriate inquiry (AAI) or, if the user is not concerned about qualifying for the innocent landowner defense, less inquiry than that constituting appropriate inquiry.

Fire Insurance Maps: Maps produced for private fire insurance map companies that indicate uses of properties at specified dates and that encompass the property. In some areas, such maps may date back to the mid-1800s; however, the assessment process only requires inquiry back to first development.

Management of Change: All modifications to the facility, equipment, and procedures, including additions and deletions and modifications to an organization that may affect process safety, to ensure safe operation.

National Priorities List (NPL): The list compiled by USEPA pursuant to CERCLA 42 USC 9605(a)(8)(B) of properties with the highest priority for cleanup pursuant to CERCLA.

Owner: Generally, the individual/business or company that holds fee title of the property.

Recognized Environmental Conditions: The presence of hazardous substances or petroleum products on a property, including facilities, groundwater, or surface water on the property.

Sump: A pit, cistern, cesspool, or similar receptacle where liquids drain, collect, or are stored.

6.0 REFERENCES

Federal:

- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Superfund Amendments and Reauthorization Act (SARA) 42 USC 9601-9675.
- Resource Conservation and Recovery Act (RCRA) 42 USC 6901-6992K.
- 40 CFR Part 312 – Standards and Practices for All Appropriate Inquiries.

New York State:

- Environmental Conservation Law, Articles 70 and 71.

Other:

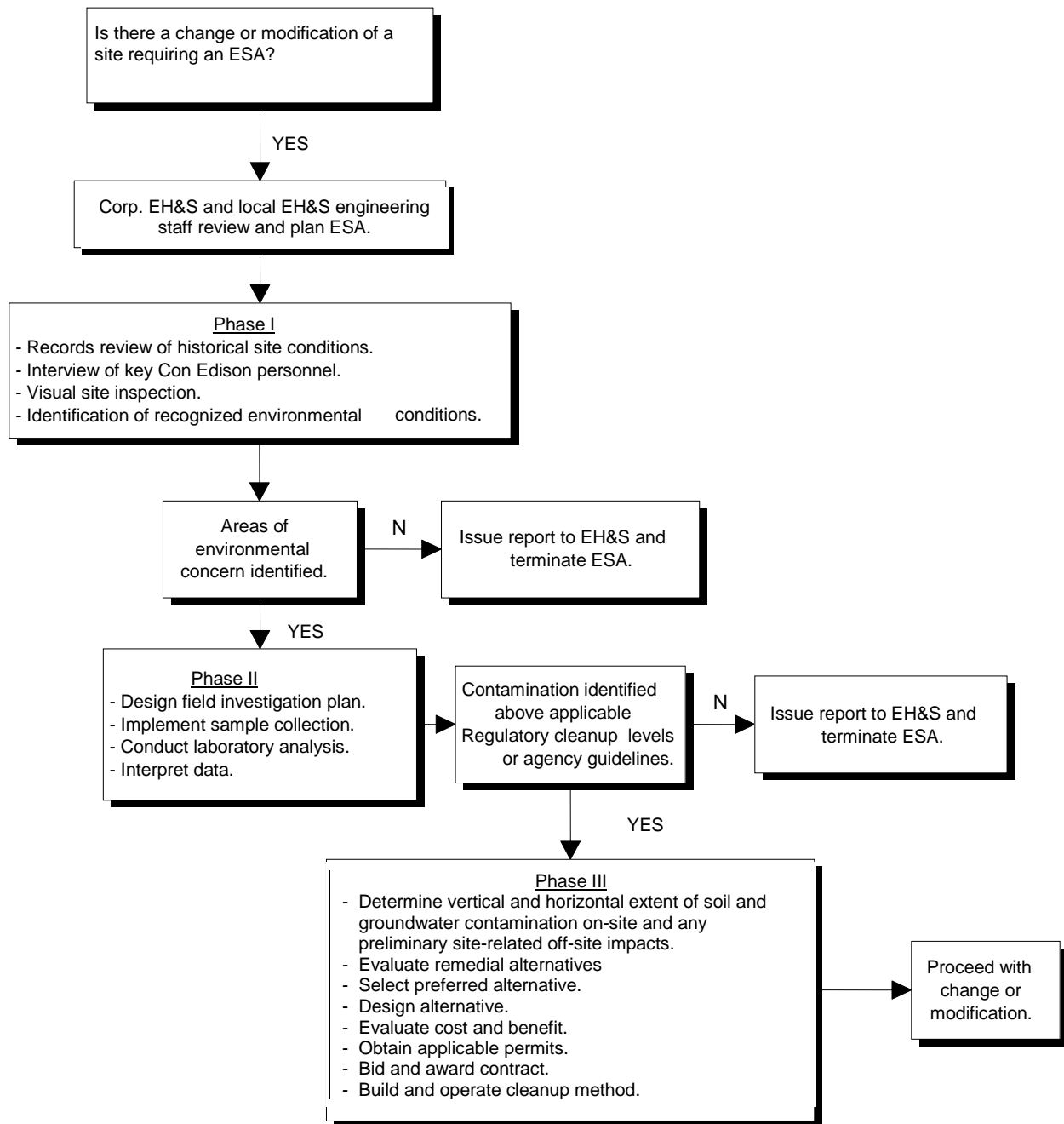
- ASTM E1527-13: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

REVISION HISTORY

<u>Revision Date</u>	<u>Revision #</u>	<u>Summary of Change</u>	<u>Author</u>
01/28/2014	7	<p>Periodic review completed with the following changes:</p> <ol style="list-style-type: none"> 1. Changed ASTM reference from ASTM E1527-05 to ASTM E1527-13. 2. Added definition of Data Failure and Controlled Recognized Environmental Condition to be in agreement with the additions to ASTM E1527-13. 3. Added to Visual Inspection (Sec.4.2.1) assessment of potential soil vapor intrusion issues and soil vapor migration pathways. 4. Minor editorial changes to improve the clarity of the procedure. 5. Updated the hyperlink to CEHSP E10.01, <i>Release Reporting</i> and CI 210-2, <i>Responsibilities of Company Organizations for Acquisition, Disposition, and Administration of Real Estate</i>. 	K. Kaiser

ATTACHMENT 1

SEQUENCE OF EVENTS FOR ENVIRONMENTAL SITE ASSESSMENT ASSOCIATED WITH FACILITY CHANGE



ATTACHMENT 2

SEQUENCE OF EVENTS FOR ENVIRONMENTAL SITE ASSESSMENT ASSOCIATED WITH PROPERTY ACQUISITION

