

Exhibit I

Executive Summary of the 2013

Supplemental Phase 2 Environmental Assessment

Supplemental Phase II Environmental Site Investigation Report

For

**Russell Station
1101 Beach Avenue
Greece, New York 14612**

Prepared for:

Rochester Gas and Electric Corporation

***PRIVILEGED AND CONFIDENTIAL
PREPARED UNDER DIRECTION OF ATTORNEY***

Prepared by:



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CONSULTANT PROJECT NO. 12-126-0881

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EXECUTIVE SUMMARY

On behalf of the Rochester Gas and Electric Corporation (RG&E), LiRo Engineers, Inc. (LiRo) completed Supplemental Phase II Environmental Site Investigation (ESI) and reporting to support the decontamination and demolition of the Russell Station located at 1101 Beach Road, Town of Greece, New York (the Station). The current work was performed supplemental to the Phase II Site Investigation conducted by Haley & Aldrich (H&A) and reported in their "Preliminary Site Characterization Investigation (PSCI) Report RG&E – Russell Station" dated July 11, 2008. This supplemental investigation was performed to evaluate areas identified, but inaccessible to H&A, and additional potential concerns identified by LiRo during Station reconnaissance work.

The objective of the supplemental Phase II investigation was to acquire environmental data and information to support the design for demolition and remediation of the select buildings, structures and utilities. The work was performed to supplement the previous PSCI work completed by H&A and will be used to plan for any demolition-required soil excavation work and to develop building remediation specifications. The supplemental Phase II work should not be construed as a Remedial Investigation. The focus rather, was to obtain environmental data for building remedial work to prepare the Main Plant area for the planned demolition and remediation (D&R) work.

LiRo reviewed numerous previous environmental investigations completed by other consultants that were performed at the Station including a number of H&A Reports. The information in the reports and the additional data was generated during this Supplemental ESI was used to assist the development of plans and specification for Station decontamination and demolition. Additional potential concerns that were identified and investigated included:

- The potential presence of residue containing Polychlorinated Biphenyls (PCBs) on stained concrete surfaces,
- Characterization of residual sediment (sludge) in sumps, pits, drains and floor trenches,
- Characterization of oil and water identified in two (2) sumps,
- Residual ash characterization,
- Characterization of refractory brick and mortar, stack brick and building brick, and
- Further characterization of site soils and railroad track ballasts/soil.

The information from previous studies performed at the Site and data developed in this investigation were used to identify the presence of contaminated materials which will require remediation or proper management in conjunction with the Demolition and Remediation (D&R) work. The following materials of environmental concern were identified that will require special consideration for cleaning, removal and disposal.

Asbestos: Investigative surveys for Asbestos Containing Materials (ACM) were completed in 2008 and additional survey work is on-going in 2013. These surveys will be utilized to develop an asbestos abatement design to ensure all abatement activities are performed in accordance with all applicable regulations.

Lead Based Paint (LBP): There are many painted surfaces throughout the facility that are considered LBP; therefore, the demolition approach will include a lead based paint control plan which complies with OSHA requirements.

Polychlorinated Biphenyl (PCB) Containing Caulk: Caulk materials which contain PCBs are present at the Main Plant. The D&R plans and specifications will include requirements for proper handling and disposal of the caulk.

Soil: The Supplemental Phase II sampling and analysis of one (1) sample of subsurface soil, completed southwest of the coal pile, identified total arsenic and barium above the Restricted Commercial Soil Cleanup Objectives (RCSCO) in one (1) sample. Previous Phase II sampling by H&A identified localized areas with SVOC and arsenic concentrations which exceeded RCSCOs. In addition, petroleum contamination is potentially present in areas of the site associated with petroleum storage or transfer. Any soil that is excavated in conjunction with site work will be characterized for onsite re-use or managed for off-site disposal as a solid waste. The D&R plans will include provisions for identification and management of contaminated soil in conjunction with the soil removal work.

Railroad Track Ballast/Soil: sampling and analysis indicated arsenic and barium were present at concentrations exceeding their RCSCOs and localized areas where soil contained a semi volatile organic compound (SVOC) that exceeded RCSCOs. Soil removal is not anticipated in conjunction with the railroad track removal work. If any soil is excavated in conjunction with track removal work, the soil will be characterized for onsite re-use or managed for off-site disposal as a solid waste. The D&R plans will include provisions for identification and management of contaminated soil in conjunction with the soil removal work.

Sludge: The sludge in sumps, pits, trenches and drain lines contained PCBs and are assumed to be petroleum containing. The D&R project plans and specifications will include requirements for the proper collection, characterization, management and disposal of sludge. The D&R specifications will also include requirements for the decontamination of all pits, sumps, trenches and drain lines throughout the facility. The cleaning specifications will require sealing/isolating discharge lines to ensure that PCBs are not discharged to the sewer system during cleaning.

Oil and Water: Analysis of the oil and water from two (2) sumps on the ground floor indicated the oil is non-hazardous lube oil. The D&R contract will include specifications for removing the oil and water and cleaning the sumps. The oil and any waste materials will be collected and properly disposed at an off-site facility permitted to receive the oil and waste and then the sumps will be cleaned.

Refractory Brick/Ash and Ash/Residue: Refractory brick and associated ash contain elevated metals concentrations. Results from this investigation reported non-hazardous metals concentrations; however, additional characterization will be required by the D&R plans and specifications for hazardous waste determination and disposal. Based on historical drawings and asbestos sampling, all refractory materials will also be assumed to be an asbestos containing waste.

Ash Wet Removal System: The D&R plans and specifications will include requirements for isolation of ash wet removal system drain lines (to prevent materials from spreading); and for cleaning, collection, characterization and disposal of ash wet removal system residuals.

Building and Stack Brick: The sampling and analysis of building and stack structural brick indicate that these bricks will be suitable for crushing and testing for re-use as backfill at the site. The D&R plans and specifications will include provisions for crushing, testing and using the crushed structural brick and concrete as backfill.

Transformer [Non-Toxic Substances Control Act (TSCA)] Pads and Oil Stained Concrete Floors: PCBs were detected on concrete non-TSCA regulated transformer pads and floor surfaces associated with electrical equipment. The D&R plans and specifications will include provisions for segregating oil-

stained concrete, cleaning the oil stained concrete, waste characterization testing of any oil-stained concrete which remains and off-site disposal of concrete with detectable levels of PCBs at a facility permitted to accept non-hazardous, PCB-containing concrete.

Additional recommendations for the project are provided below:

- Sufficient sampling and laboratory analysis was completed to be representative of the materials and locations identified as potential areas of concern (PAOCs). However, it was not intended to be exhaustive or a substitute for appropriate judgment in the event that suspect materials are identified through visual, olfactory or other evidence in the field, or if conditions different than described are encountered.
- The D&R Plans and Specifications will identify requirements for the D&R Contractor to develop a site-specific health and safety plan (HASP) that will meet the requirements set forth by the Occupational, Safety and Health Administration (OSHA), the NYSDOH and any other applicable regulations. Before beginning any D&R activity, the contractor will submit a HASP that identifies the possible locations and risks associated with the potential contaminants that may be encountered, and the administrative and engineering controls that will be utilized to mitigate potential exposure of workers and the surrounding public.
- Based on the presence of concentrations of SVOC and metals contaminants identified during this Phase II ESI and the presence of fill material of variable nature, the Contract documents will identify provisions for managing, handling, transporting, and disposing of non-hazardous contaminated soil. As a contingency, the Contract documents will also identify provisions for managing, handling, transporting, and disposing of petroleum contaminated soil (based on potential presence due to petroleum storage and use) as well as hazardous soil in the event that waste characterization samples exceed Total Characteristic Leaching Procedure (TCLP) limits or polychlorinated biphenyls (PCB) limits.
- The Contractor will be required to submit a building cleaning and material handling plan to identify the specific protocol and procedures that will be employed to manage all waste in accordance with applicable regulations.
- Ash and refractory brick will be managed as asbestos-contaminated and metals-contaminated wastes requiring off-site disposal at a facility permitted to receive the waste. The cleaning specification will require sealing/isolating sewer lines to ensure that PCBs or other contaminants are not discharged into the sewer system during cleaning. Any surfaces which were in contact with the materials will be decontaminated by pressure washing. Decontamination water will be containerized and tested for treatment or off-site disposal.
- Sumps, pits, trenches, floor drains contain oily waste will be cleaned by pumping out and collecting/containing residuals for characterization and off-site disposal. These structures will be further cleaned by pressure washing.
- Building interiors will be fully decontaminated. General building cleaning will be conducted using pressure washer methods in accordance with the requirements of the Contractors lead control plan and building cleaning plan.
- All wash waters used during any building cleaning process will be collected, characterized and treated onsite to meet sewer discharge standards or disposed of at an off-site facility permitted to receive the waste water.
- Dust control procedures will be included in the D&R plans to minimize the creation and dispersion of fugitive airborne dust. The Contractor will implement dust control measures to minimize potential airborne contaminants released as a direct result of construction activities. A Community Air Monitoring Plan (CAMP) will be developed in accordance with New York State Department of Environmental Conservation (NYSDEC) Division of Environmental Remediation (DER)-10 requirements. The CAMP is intended to provide a measure of protection for the

downwind community from potential airborne contaminant releases as a direct result of construction activities.

- Structural and building brick and unstained concrete will be crushed onsite for use as backfill in sub-grade structures (i.e., basements, pits, etc.). The crushed material will be tested for compliance with Standards, Criteria and Guidance (SCG) values prior to re-use. Any imported soil fill required for placement over non-paved areas will be tested for compliance with SCGs by laboratory analysis.
- The D&R specifications will include requirements for ash and residues removal from all boilers, flues, precipitators and ductwork.
- The D&R specifications will include requirements for coal dust and residual coal cleaning and removal from equipment and building interior surfaces in accordance with all applicable safety and health guidance and regulations (i.e., OSHA, MSHA, NIOSH, etc.)
- The D&R specifications will include requirements for testing (as needed), draining, cleaning and removal of all remaining transformers and dielectric fluid containing equipment.
- The D&R specifications will include requirements for draining, cleaning and removal of all hydraulic fluids in remaining equipment.
- The D&R specifications will include requirements for removing all fuel oil remaining in tanks, lines and equipment. All fuel oil tanks, lines and equipment should be flushed and cleaned prior to disposal.
- The D&R specifications will include requirements for removing pigeon guano on Station building surfaces. Surfaces that include the pigeon excrement are located throughout the building on interior and exterior surfaces. The wastes will be soaked with water, or other liquids, to prevent the creation of harmful dust during removal. The waste will be removed prior to the demolition of building materials containing the waste. The specific removal methods will be determined by the Contractor and appropriate sub-contractors that specialize in the removal and disposal of potential biological hazards associated with guano.
- The D&R specifications will include requirements for removing any remaining sanitary wastes located in equipment (toilets, sinks, lift pumps and showers) and sewer lines. All sanitary lines and equipment will be flushed, cleaned and drained prior to disposal. This will be determined by the Contractor and appropriate sub-contractors that specialize in the removal and disposal of potential biological hazards associated with sanitary waste.

Based on the results of this focused ESI, LiRo will develop specifications for the D&R Contractor to prepare and submit Materials Handling Plans that will be used to support the D&R of the facility.