

Town of Willsboro

PERIODIC REVIEW REPORT

Willsboro Black Ash Pond Site

Willsboro, Essex County, New York

NYSDEC Site No. 516009

Reporting Period	April 22, 2023 through April 22, 2026
Prepared for	New York State Department of Environmental Conservation
Prepared by	Town of Willsboro 5 Farrell Road Willsboro, New York 12996
Date	June 2026



WILLSBORO

NEW YORK EST. 1765

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1 Introduction

The Town of Willsboro has prepared this Periodic Review Report (PRR) for the Willsboro Black Ash Pond Site (Site), NYSDEC Site No. 516009, located in Willsboro, Essex County, New York. This PRR covers the reporting period April 22, 2023 through April 22, 2026 and is intended to document continued implementation of, and compliance with, the Site Management Plan (SMP), the Environmental Easement, and the applicable Institutional Controls for the Site.

The Site was remediated by Georgia-Pacific LLC in accordance with the NYSDEC-approved remedial program. Following completion of the initial post-remedial monitoring period and the transfer of ongoing site management responsibilities, the Town is responsible for implementing the SMP and submitting periodic certifications and reports as required by NYSDEC.

This PRR includes:

- A summary of the Site and remedial history;
- A summary of the Institutional Controls and site management requirements;
- The results of the Town's site-wide inspection and administrative review for the reporting period;
- A discussion of remedy performance, effectiveness, and protectiveness;
- Identification of any areas of non-compliance and corrective measures, if applicable; and
- Recommendations regarding the SMP and future site management requirements.

The completed NYSDEC Institutional Controls/Engineering Controls Certification Form is included as Appendix A. The completed Annual Site-Wide Inspection Checklist is included as Appendix B. A Black Ash Pond Site Map, to be inserted from Figure 1 of the June 2019 Arcadis Periodic Review Report, is included as Appendix C. Site visit photographs are included as Appendix D. NYSDEC has advised the Town that the cover on the ash pond area is a quasi-engineering control but does not require certification; therefore, the Town has completed Box 6 as the owner/designated representative and has not completed Box 7.

2 Site Overview

2.1 Site Location and Description

The Site is located in the Town of Willsboro, Essex County, New York. The current NYSDEC site information identifies the site address as Gilliland Lane, Willsboro, New York 12996. The Site is also described in the SMP as being located at the end of School Street. The Site is identified on the Essex County Tax Map as Section 31.9, Block 1, Parcel 20.100 and consists of approximately 24.830 acres.

The Site is bounded by the Boquet River on the north and west sides, lands owned by the Adirondack Nature Conservancy to the east, and additional lands owned by the Adirondack Nature Conservancy and the Town to the south. The Town wastewater treatment plant occupies a contiguous parcel along the southern border of the property. The Site is located within the floodplain of the Boquet River, approximately two miles west of Lake Champlain.

2.2 Site History

From approximately 1884 to 1964, the Champlain Fiber Company, later known as the Willsboro Pulp Mill, operated a pulp mill on the north side of the Boquet River opposite the Site. In 1964, the mill property was purchased by Georgia-Pacific. In 1966, the Town acquired the property from Georgia-Pacific.

A settling basin/lagoon was created on the south side of the Boquet River by constructing a crescent-shaped dike or berm along the riverbank. Black ash materials were first trucked and later piped to the south side of the river and deposited within the lagoon. The black ash is the residue of spent black liquor combustion associated with paper

pulp production. Over time, portions of the berm eroded, exposing black ash material to the river in certain areas prior to remediation.

2.3 Summary of Remedial Program and Site Management

The selected remedy was implemented in 2012 and 2013. The primary remedial objective was to eliminate or reduce the migration of, or exposure to, black ash material remaining at the Site. The remedial program included the following primary components:

- Excavation and reshaping of black ash material along the riverbank;
- Consolidation of material within the upland soil cover area;
- Construction of stabilized riverbank features, including riprap underlain with geotextile fabric;
- Grading of the Site to reduce infiltration, divert stormwater flow, and reduce ponding;
- Construction of an inlet/outlet structure to reconnect the Site floodplain to the Boquet River;
- Construction and maintenance of a soil cover system consisting of clean topsoil and seeded cover to prevent exposure to remaining black ash material;
- Execution and recording of an Environmental Easement to restrict site use; and
- Development and implementation of the SMP for long-term site management, inspection, maintenance, and reporting.

The SMP includes an Engineering and Institutional Control Plan, a Site Monitoring Plan, and a Maintenance Plan. The SMP and the Environmental Easement remain the primary documents governing the Town's continuing site management responsibilities.

3 Remedy Performance, Effectiveness, and Protectiveness

The main goal of the selected remedy is to eliminate or reduce the migration of, or exposure to, black ash material remaining at the Site. The remedy relies on the continued integrity of the soil cover, stabilized riverbank, riprap, vegetation, and Institutional Controls established through the Environmental Easement and SMP.

During the reporting period, the Town completed an administrative review and a non-intrusive visual site inspection. Based on that review, the Town is not aware of any property transfer, subdivision, merger, tax map amendment, change of use, permit issuance, development, intrusive work, groundwater use, vegetable gardening, farming, or other activity inconsistent with the SMP or Environmental Easement during the reporting period.

Two Town Board members conducted a non-intrusive visual site inspection on May 12, 2026. They reported that the soil cover and seeded cover areas remain in place and have not deteriorated. They also reported that the riprap along the Boquet River appears stable and functioning as intended to protect the remaining black ash material from release to the river. No intrusive work, excavation, sampling, or disturbance of the soil cover or remaining black ash material was performed as part of the inspection.

Based on the administrative review and visual inspection, the remedy continues to be protective of the environment and remains effective in achieving the remedial objectives for the Site. No corrective measures are proposed at this time.

4 IC/EC Plan Compliance Report

Because remaining black ash material exists at the Site, long-term site management requirements remain in place. This section describes the Institutional Controls, site management features, status of compliance, and any corrective measures identified during the reporting period.

4.1 Institutional Controls

The Environmental Easement and SMP establish Institutional Controls intended to manage remaining black ash material, control future disturbance, and restrict site use. The primary Institutional Controls and site restrictions include:

- Compliance with the Environmental Easement and SMP by the Town and any successors or assigns;
- Use of the property only for Restricted Residential use, which includes recreational use, provided that the long-term controls are maintained;
- No use of the property for a higher level of use, such as Unrestricted Residential use, without additional remediation and NYSDEC approval of an amendment to the Environmental Easement;
- All future activities that have the potential to disturb remaining black ash material must be conducted in accordance with the SMP;
- Use of groundwater underlying the property is prohibited unless treated and rendered safe for the intended use;
- Vegetable gardens and farming on the property are prohibited;
- Data and information relevant to management of the Site must be reported to NYSDEC as required; and
- NYSDEC access to the Site must continue to be provided to evaluate the remedy and continued maintenance of controls.

For the April 22, 2023 through April 22, 2026 reporting period, the Town has confirmed the following:

Administrative Item	Town Review Result
Property sold, subdivided, merged, or subject to tax map amendment	No
Change of use at the Site	No
Federal, state, or local permits issued for or at the property	No
Site currently undergoing development	No
Current site use consistent with allowed use	Yes
Institutional Controls in place and functioning as designed	Yes

4.2 Engineering Controls and Site Management Features

The current NYSDEC certification form for this reporting period identifies no Engineering Controls requiring certification. NYSDEC has advised the Town that the cover on the ash pond area is a quasi-engineering control, but it does not require certification. Accordingly, the Town has completed the owner/designated representative certification in Box 6 of the IC/EC Certification Form and has not completed the Qualified Environmental Professional certification in Box 7.

Although formal Engineering Control certification is not required, the Town continues to review and maintain the soil cover, seeded cover areas, stabilized riverbank, riprap, and related site management features consistent with the SMP.

4.3 Evaluation and Status

The Town completed a document review and site-wide visual inspection using the Annual Site-Wide Inspection Checklist. The document review included review of the Environmental Easement, the Plan of Restricted Area, and the property description/as-built information associated with the Final Engineering Report and SMP.

The May 12, 2026 visual inspection did not identify evidence of activities or uses contrary to the Environmental Easement. No visual evidence of utility work, building construction, demolition, soil excavation, significant soil erosion, significant pavement disturbance, significant vegetation disturbance, invasive species above the applicable threshold, significant movement of riprap, significant bare spots, or surface grade changes was identified in the completed checklist.

Based on the Town’s review, the Institutional Controls remain in place and continue to function as designed.

4.4 Corrective Measures

No deficiencies of the Institutional Controls or site management features were identified during this reporting period. No corrective measures are proposed at this time.

4.5 Conclusions and Recommendations for Changes

The Town recommends no changes to the Institutional Controls, SMP, Environmental Easement, or site management requirements at this time. The Town will continue to manage the Site in accordance with the SMP and will coordinate with NYSDEC regarding any future activities that may require notification or approval.

5 Site Monitoring Plan Compliance Report

This section summarizes the site monitoring components, the monitoring completed during the reporting period, comparison of results with the remedial action objectives, corrective measures, and recommendations.

5.1 Components of the Site Monitoring Plan

The Site Monitoring Plan contained in the SMP identifies the following monitoring components:

- **Stabilized riverbank monitoring:** visual inspection for slope failure or evidence of erosion, movement or disturbance of riprap that could expose or disturb remaining black ash material, and areas with undercut banks.
- **Soil cover system monitoring:** visual inspection for erosion, depressions or surface water ponding, excessive settlement, drainage or growth problems, stressed or sparse cover, exposed remaining black ash material, or other conditions that could affect the performance of the completed remedy.
- **Vegetation monitoring:** visual inspection for stressed or sparse cover and survival and condition of plantings.
- **Undisturbed area monitoring:** visual inspection for stressed or sparse cover and significant bare spots.
- **Site-wide inspection:** inspection of the above features and review of site conditions to document compliance with the SMP and Environmental Easement.

5.2 Summary of Monitoring Completed During Reporting Period

Two Town Board members conducted a non-intrusive visual inspection on May 12, 2026. The inspection was documented using the Annual Site-Wide Inspection Checklist, included as Appendix B. Photographs taken during the site visit are included as Appendix D.

Monitoring Area	Summary of Observations
Soil cover and seeded cover areas	The soil cover and seeded cover areas were reported to remain in place and not deteriorated. No exposed black ash material was reported.
Stabilized riverbank and riprap	The riprap along the Boquet River was reported to appear stable and functioning as intended. No significant disturbance or movement of riprap was reported.
Vegetation	No significant disturbance to restored vegetation was identified in the completed inspection checklist.
Undisturbed area	No significant bare spots or conditions requiring corrective action were identified in the completed inspection checklist.
General site conditions	No evidence of prohibited use, development, excavation, or other activity contrary to the Environmental Easement was identified.

5.3 Comparison with Remedial Action Objectives

The site-wide inspection and administrative review indicate that the remedial action objectives continue to be met. Specifically, the remaining black ash material remains covered and controlled, the stabilized riverbank and riprap continue to protect the riverbank area, the Institutional Controls remain in place, and no prohibited use or disturbance was identified during the reporting period.

5.4 Corrective Measures

No significant monitoring deficiencies were identified during the reporting period. No corrective measures are proposed at this time.

5.5 Conclusions and Recommendations for Changes

The Town recommends no changes to the Site Monitoring Plan at this time. The Town will continue inspections and reporting on the schedule specified by NYSDEC and in accordance with the SMP.

6 Maintenance Plan Compliance Report

This section summarizes the components of the Maintenance Plan, maintenance completed or identified during the reporting period, and recommendations for improvements.

6.1 Components of the Maintenance Plan

The Site remedy does not rely on mechanical systems. The Maintenance Plan focuses on maintaining the physical and vegetative site management features that protect the remaining black ash material and preserve the remedy. Maintenance may be required if inspections identify significant movement of riprap, undercut banks, slope failure, erosion, issues with the soil cover, exposed remaining black ash material, significant vegetation stress or loss, invasive species above applicable thresholds, or significant bare spots in the undisturbed area.

If future maintenance needs are identified, the Town will coordinate with NYSDEC and, upon approval where required, implement appropriate corrective measures. Such measures may include riverbank repair, additional soil cover, erosion controls, seeding, vegetation management, or other work necessary to maintain the effectiveness of the remedy.

6.2 Summary of Maintenance Completed During Reporting Period

Based on the Town's review and the May 12, 2026 site-wide inspection, no corrective maintenance was identified as necessary during this reporting period. The Town is not aware of any intrusive maintenance, excavation, or disturbance of remaining black ash material during the reporting period.

6.3 Conclusions and Recommendations for Improvements

No recommendations for maintenance improvements are proposed at this time. The Town will continue to monitor site conditions and will consult with NYSDEC if future conditions indicate that maintenance or corrective measures are needed.

7 Conclusions and Recommendations

Based on the administrative review, document review, and May 12, 2026 non-intrusive visual inspection, the Town concludes that:

- The Site remains in Town ownership and no property transfer, subdivision, merger, or tax map amendment occurred during the reporting period;

- There has been no change of use at the Site during the reporting period;
- No federal, state, or local permits were issued for or at the property during the reporting period;
- The Site is not undergoing development;
- The current site use remains consistent with the allowed use;
- The Institutional Controls remain in place and are functioning as designed;
- The soil cover and seeded cover areas remain in place and have not deteriorated based on the visual inspection;
- The riprap along the Boquet River appears stable and functioning as intended based on the visual inspection;
- No exposed black ash material or prohibited disturbance was identified;
- No corrective measures are proposed at this time;
- No changes to the SMP, Environmental Easement, or reporting frequency are recommended at this time; and
- The remedy continues to be protective of the environment and is performing as intended.

The Town will continue to comply with the SMP and Environmental Easement and will coordinate with NYSDEC regarding any future activities or conditions requiring notification, approval, maintenance, or corrective action.

8 References

- Arcadis. 2012. Remedial Action Work Plan. Prepared for Georgia-Pacific LLC. August 2012.
- Arcadis. 2014. Final Engineering Report. Prepared for Georgia-Pacific LLC. December 2014.
- Arcadis. 2014. Site Management Plan. Prepared for Georgia-Pacific LLC. December 2014.
- Arcadis. 2019. Periodic Review Report, Willsboro Black Ash Pond Site, Willsboro, Essex County, New York, NYSDEC Site No. 516009, including Figure 1, Site Plan. Prepared for Georgia-Pacific LLC. June 2019.
- Georgia-Pacific LLC / Arcadis. Site Management Plan, Willsboro Black Ash Pond Site, Willsboro, Essex County, New York, NYSDEC Site No. 516009. Revised November 29, 2024.
- NYSDEC. 2007. Record of Decision for the Willsboro Black Ash Pond Site. March 2007.
- NYSDEC. 2011. Explanation of Significant Difference to the Final Record of Decision for Willsboro Black Ash Pond Site. August 2011.
- NYSDEC. 2024. Letter from John B. Swartwout, P.E., to Shaun Gilliland, Supervisor, Town of Willsboro, Re: Site Management, Willsboro Black Ash Pond, Site No. 516009. October 16, 2024.
- NYSDEC. 2026. Reminder Notice: Site Management Periodic Review Report and IC/EC Certification Submittal, Willsboro Black Ash Pond, Site No. 516009. March 10, 2026.
- Town of Willsboro. 2014. Environmental Easement, Essex County Clerk's Office Book 1779, Page 228. Recorded December 2, 2014.

Appendix A

Completed NYSDEC Institutional Controls/Engineering Controls Certification Form



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



	Site Details	Box 1
Site No. 516009		
Site Name Willsboro Black Ash Pond		
Site Address: Gilliland Lane Zip Code: 12996		
City/Town: Willsboro		
County: Essex		
Site Acreage: 24.830		
Reporting Period: April 22, 2023 to April 22, 2026		
		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? Restricted-Residential, 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.		
		<u>6/24/26</u>
Signature of Owner, Remedial Party or Designated Representative		Date

SITE NO. 516009

Box 3

Description of Institutional Controls

Parcel

31.9-1-20.100

Owner

Town of Willsboro

Institutional Control

Ground Water Use Restriction
Landuse Restriction
Site Management Plan
IC/EC Plan
Monitoring Plan
O&M Plan

- Implement, maintain and monitor engineering control systems
- Prevent future exposure of black ash by controlling disturbance of cover material
- Limit the use and development of the Site to Restricted Residential uses only
- Any future activities with potential to disturb remaining black ash material must be conducted in accordance with the Site Management Plan
- Vegetable gardens and farming are prohibited

Box 4

Description of Engineering Controls

None Required

Not Applicable/No EC's

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. 516009

Box 6

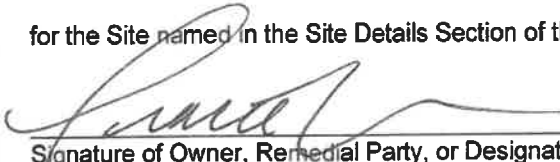
SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

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 Tracie McGill at 5 Farrell Rd. Willsboro, NY 12996
print name print business address

am certifying as Town Supervisor (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

6/25/24
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 _____ at _____,
print name print business address

am certifying as a Qualified Environmental Professional for the _____
(Owner or Remedial Party)

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

Stamp
(Required for PE)

Date

Appendix B

Completed Annual Site-Wide Inspection Checklist

ANNUAL SITE-WIDE INSPECTION CHECKLIST
WILLSBORO BLACK ASH POND SITE

6. Is there any visual evidence of significant soil erosion at the property since the last inspection, specifically in the soil cover area and/or the stabilized riverbank area?

No

Yes - If yes, describe below and show the location(s) of such erosion on a plan.

7. Is there any visual evidence of significant pavement construction, disturbance, or excavations at the property since the last inspection?

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

8. Is there any visual evidence of significant disturbance to the vegetation installed during restoration in the upland Soil Cover Area or the Riverbank Area? Has at least 85% of the installed vegetation survived?

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

9. Do invasive species account for more than a total of 5% of the restored area?

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

10. Is there any visual evidence of significant disturbance to or movement of the riprap installed to stabilize the Riverbank

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

11. Is there any visual evidence of significant bare spot(s) in the Undisturbed Area?

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

12. If any of the conditions listed in the response to Questions 4 through 11 appears likely to have significantly altered the surface grade of the property compared to the surface grade shown on the as-built drawings included in the Final Engineering Report (or an alternative, more recent plan proposed by the Owner), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade shown on the above listed drawing and/or plan. (If the Owner proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

13. Inspection Completed: 5/12/26

**If necessary, attached additional pages for descriptions of any items observed related to the above questions.

Appendix C

Black Ash Pond Site Map

Appendix D

Site Visit Photographs

