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June 24, 2026

Ms. Melissa Sweet
New York State Department of Environmental Conservation
Division of Environmental Remediation, BURB
625 Broadway
Albany, New York 12233-7016

Re: Periodic Review Report – March 2025
Former Jared Holt Manufacturing
NYSDEC Site No. B-00005-4
Terracon Project No. JB187006

Dear Ms. Sweet,

Submitted herewith is the 14th annual Periodic Review Report (PRR) for the above reference property, as required by the Site Management Plan. This PRR was completed in accordance with and authorized by the Albany Housing Authority.

We appreciate the opportunity to complete these services. Please call if you have questions regarding this information.

Very truly yours,
Terracon Consultants - NY, Inc.

A handwritten signature in black ink, appearing to read "DJ", written over a horizontal line.

Dan Johnson
Department Manager

A handwritten signature in black ink, appearing to read "CCL", written over a horizontal line.

Christopher C. Langewisch
Senior Project Manager
Authorized Project Reviewer

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PERIODIC REVIEW REPORT

Former Jared Holt Manufacturing "Mfg." Site
City of Albany, Albany County, New York
NYSDEC Site Number: B-00005-4
Terracon Project Number JB187006

1.0 INTRODUCTION AND DESCRIPTION OF THE PROGRAM

1.1 INTRODUCTION

This Periodic Review Report (PRR), completed by Terracon Consultants - NY, Inc. (Terracon) (formerly the Dente Group, a Terracon Company and Evergreen Testing and Environmental Services) is required as an element of the Site Management Plan, which was included as a requirement of the original Record of Decision (ROD) at the Former Jared Holt Manufacturing "Mfg." (JHM). Property under the New York State (NYS) Environmental Restoration Program (ERP), under the 1996 Clean Water / Clean Air Bond Act, administered by the New York State Department of Environmental Conservation (NYSDEC). The Site was investigation in accordance with the State Assistance Contract (SAC) #C300443, which was executed on May 4, 1998. The remedy was implemented on all of the property by South End Associates, L.P. through its developer, Omni Housing Development, LLC (Omni). The remedy was implemented in accordance with the March 2001 ROD and Site Specific Reuse and Development Plan, dated September 2007 (amended March 2010 to include Phase II of the project), prepared by Evergreen Testing and Environmental Services, Inc. (Evergreen).

This PRR report is the 14th annual review of the site since the completion of the Site Management Plan in October 2011. The next report should be completed in March of 2027.

1.2 SITE AND LOCATION DESCRIPTION

The Site is located in the county of Albany, New York and is identified as four (4) contiguous parcels known as SBL Nos. 76.73-1-18 (111 Broad Street), 76.73-1-20 (103 Broad Street), 76.73-1-21 (101 Broad Street), and 76.73-1-22 (99 Broad Street) on the Albany tax map. The Site is situated on an approximately 0.53-acre area bounded by residences to the north, Third Avenue to the south, Broad Street to the east, and Clinton Street to the west (Figure 1 in Appendix A).

The Site is divided into two internal phases or section, known as Phase I and Phase II, to facilitate development. Phase I is located on the south side of the overall property, is located on tax parcel 76.73-1-18 (111 Broad Street), and is 0.40 acres in size.

Phase II is located on the north side of the overall property and is located on tax parcels 76.73-1-20 (103 Broad Street), 76.73-1-21 (101 Broad Street), and 76.73-1-22 (99 Broad Street). Both Phase I and Phase II are developed with residential structures. The phases are depicted on the tax map in Appendix A.

1.3 SITE HISTORY

The manufacturing use of the former JHM site began on or about 1885 and continued until 1987. The principal operations were in the leather and shoe-making industry. Jared Holt Manufacturing Company made “stitching wax”, which was a wax made from a mixture of plant gums, beeswax, tallow, and paraffin waxes. Stitching was used on shoes to lubricate the thread, protect it from moisture, and to help hold the threads in place.

The JHM process involved a high temperature blending/emulsification process where large kettles were heated to various temperatures. Modernization of the equipment occurred in the 1940’s and the products that JHM produced expanded to include specialty cleaners, polishes, and floor waxes. The facility also included a laboratory for research and development. The JHM buildings have since been razed and removed from the site.

Prior to development of current buildings on the site, multiple environmental investigation reports and remediation events were completed at the site. The site has been previously investigated by others. A NYSDEC environmental restoration (Brownfields) project with state assistance funds provided by the 1996 Clean Air / Clean Water Bond Act was satisfactorily completed on the site from approximately July 1998 to October of 2000. The NYSDEC reviewed the previous investigations in conjunction with the Brownfield investigation, and based on such, the NYSDEC completed a ROD for the site listing a selected remedy for the contaminants identified at the site. The contaminants were identified in the ROD as Polycyclic Aromatic Hydrocarbon (PAH) compounds in the site soils. Other contaminants at the site were not considered to be significant and did not require a remedy. The remedy in the ROD includes the importation of two feet of clean fill with a demarcation layer to address the potential for human exposure/contact to identifiable hazardous substances. The remedy also includes a property deed restriction forbidding the use of groundwater at the site. Acceptable alternative protective cover possibilities are listed in the ROD as: sidewalks, parking lots, building footprints, or other protective barriers to limit contact with the impacted subsurface soils at the site.

The city of Albany IDS sold the property to Southend Associates L.P. (Southend) in 2007, before the remedy in the ROD was completed. Southend, through Omni Housing Development LLC (Omni, the developer), completed a "change of use" notification and Site Specific Reuse and Development Plan (SSRDP), dated September 2007 and amended in March of 2010 to include Phase II of the site, prepared by Evergreen, which was submitted to the NYSDEC. The SSRDP included planned construction of residential structures on the site, a property deed restriction, and acceptable alternative protective cover possibilities as listed in the ROD, including: sidewalks, parking lots, building footprints, and the importation of two feet of clean fill with a demarcation layer to limit contact with remaining exposed soil at the site. The NYSDEC determine that the Plan was consistent with the requirements of the ROD issued by the Department for the former Jared Holt Site and so stated in a letter to Southend.

In accordance with the ROD and SSRDP, a soil cap and cover system, including building foundations, asphalt paving, and concrete walks, were installed on the site as the remedy. The Site Management Plan (SMP) was prepared to manage site soils in perpetuity or until extinguishment of the Deed Restriction. Work on the site began with a Site Investigation (SI) in July of 1998, and was completed with the installation of the final topsoil cover in July 2011. All reports associated with the site can be viewed by contacting the NYSDEC or its successor agency managing environmental issues in New York State.

1.4 SUMMARY OF REMEDIAL ACTIONS

The site was developed in accordance with the NYSDEC-approved SSRDP for an Environmental ROD report, dated September 2007 and amended in March 2010.

The following is a summary of the remedy performed at the site:

- Voluntary excavation of the soil/fill exceeding restricted residential SCO's was completed on Phase I. The excavated soil consisted of the PAH hot spot as described in Appendix E of the SMP. The excavated hot spot soil was replaced with clean sand and gravel fill to grade, prior to the construction of the buildings.
- Construction and maintenance of a soil cover system consisting of approximately 24" of clean fill, including 6" of topsoil cover, to prevent human exposure to contaminated soil/fill (if any) that may remain at the site.
- Execution and maintenance of a deed restriction to restrict groundwater use (as a planned amendment) and to include provisions for a SMP to prevent future exposure to soils below the soil cover system at the Site.

- Other major remedial elements including: covering of the site soils (both Phase I and Phase II, though site soils on Phase II were not excavated except for the building foundations) with concrete/asphalt/building foundations, placement of an orange plastic snow or safety fence demarcation layer below at least 24" of clean fill, and documentation that replacement fill does not contain contaminants over the NYSDEC SCO's for clean fill.
- Development and implementation of a SMP for long term management of soil below the cover as required by the deed restriction, which includes plans for: (1) Institutional and Engineering Controls, (2) periodic monitoring, and (3) reporting

Work on the Site began with the Site Investigation in July 1998 and the remedy was completed with the installation of the final soil cover in July 2011.

2.0 ENGINEERING AND INSTITUTIONAL CONTROL PLAN

2.1 INTRODUCTION

Since potential contamination may be present below the soil cover system at this site, Engineering controls and Institutional Controls have been implemented to protect public health and the environment for the applicable future use. The site has the following Engineering Controls:

- Soil: a minimum of 24 inches of soil cover underlain by an orange, plastic snow fence as a demarcation layer
- Asphalt surfacing
- Concrete surfacing or building slabs

A deed restriction is required to maintain and monitor these Engineering Controls. The deed restriction requires that Engineering Controls must be maintained as specified in the SMP.

In addition, the deed restriction places the following restrictions on the property:

- Use of groundwater underlying the property is prohibited without treatment rendering it safe for the intended use.
- The property shall not be used for any purpose other than the following: multi-family, medium density residential development with possible vacancies for commercial use
- All future activities on the property that would disturb remaining contaminated material must be conducted in accordance with the Excavation Plan included in this SMP.

The purpose of the surface cover system is to eliminate the potential for human contact with the fill material and eliminate the potential for contaminated runoff from the property, which will prevent ingestion/direct contact with contaminated soil.

2.2 ENGINEERING CONTROLS

Cover System

Exposure to potential contamination in soil/fill at the site is prevented by a soil cover system placed over the site. This cover system is comprised of a minimum of 24 inches of

clean soil, asphalt pavement, concrete covered sidewalks, and concrete building slabs. The Excavation Plan that appears in Section 2.4 of the Site Management Plan outlines the procedures required to be implemented in the event the cover system is breached, penetrated, or temporarily removed, and if any underlying remaining contamination is disturbed. Procedures for the inspection and maintenance of this cover are provided in the Monitoring Plan included in Section 3 of the SMP.

The cover system is a permanent control and the quality and integrity of this system will be inspected at defined, regular intervals in perpetuity.

2.3 INSTITUTIONAL CONTROLS

An Institutional Control is required by the ROD, by way of a deed restriction, to: (1) maintain and monitor Engineering Control systems; and (2) have this SMP in place to prevent future exposure to potential contamination by controlling disturbances of the subsurface contamination. Adherence to the Institutional Control on the site is required by the deed restriction and will be implemented under this Site Management Plan. These Institutional Controls are:

- Compliance with the deed restriction by the Grantor and the Grantor's successors and assigns with all elements of this SMP;
- All Engineering Controls must be maintained as specified in the SMP;
- All Engineering Controls must be inspected and certified at a frequency and in a manner defined in the SMP
- Data and information pertinent to Site Management for the Controlled Property must be reported at the frequency and in a manner defined by the NYSDEC in the SMP. Currently this frequency is annually;
- The site owner or remedial party will submit to the NYSDEC a written statement that certifies, under penalty of perjury that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted at a frequency determined by the NYSDEC. Currently that frequency is annually.

The site has an Institutional Control in the form of a deed restriction that may not be discontinued without approval from the NYSDEC.

3.0 SITE INSPECTION

3.1 GENERAL

A site inspection was completed on the subject property on May 29, 2026 at around 3:30 pm by Terracon representative Braelyn Bourgeois. Ms. Bourgeois was unescorted at the time of the inspection as the site has open access. Ms. Bourgeois observed the asphalt paved parking area and concrete sidewalks, along with the grassed lawn areas of the site, building foundations, and landscape islands. The use of the property (residential units) has not changed since the completion of the Site Management Plan. Photographs taken at the time of the site visit are presented in Appendix B.

The property appears to have remained relatively unchanged since the previous annual inspection in March 2025. Minimal cracks were noted within the asphalt and concrete covered areas of the site, though they are considered minor and do not represent a concern. Small lawn and mulch areas of the site appear slightly disturbed due to minor erosion. However, the demarcation snow fence was not observed, and erosion is minimal. Small amounts of surface trash and debris were observed during the site investigation, though it was minimal and did not significantly limit observation of ground surface conditions. A breach in the cover system was not observed at the time of the inspection.

Media monitoring or sampling are not required on this property as part of the routine inspections. As no mechanical equipment is incorporated into this remedial system, operations and maintenance are in this case not applicable.

3.2 CONCLUSIONS

In the opinion of Terracon the EC/IC installed on this property, which were completed in July of 2011, are generally functioning as intended in preventing human contact with residual contamination. The EC/IC appear to be in general compliance with the requirements laid out in the SMP, including deed restrictions. Engineering and Institutional Controls Certification Forms are presented in Appendix C.

3.3 RECOMMENDATIONS

It is recommended that the cover system remain in place, as outlined in the SMP and Completion Report. Further changes to the cover system are not warranted at this time.

APPENDIX A



SEE SHEET NO. 76.64

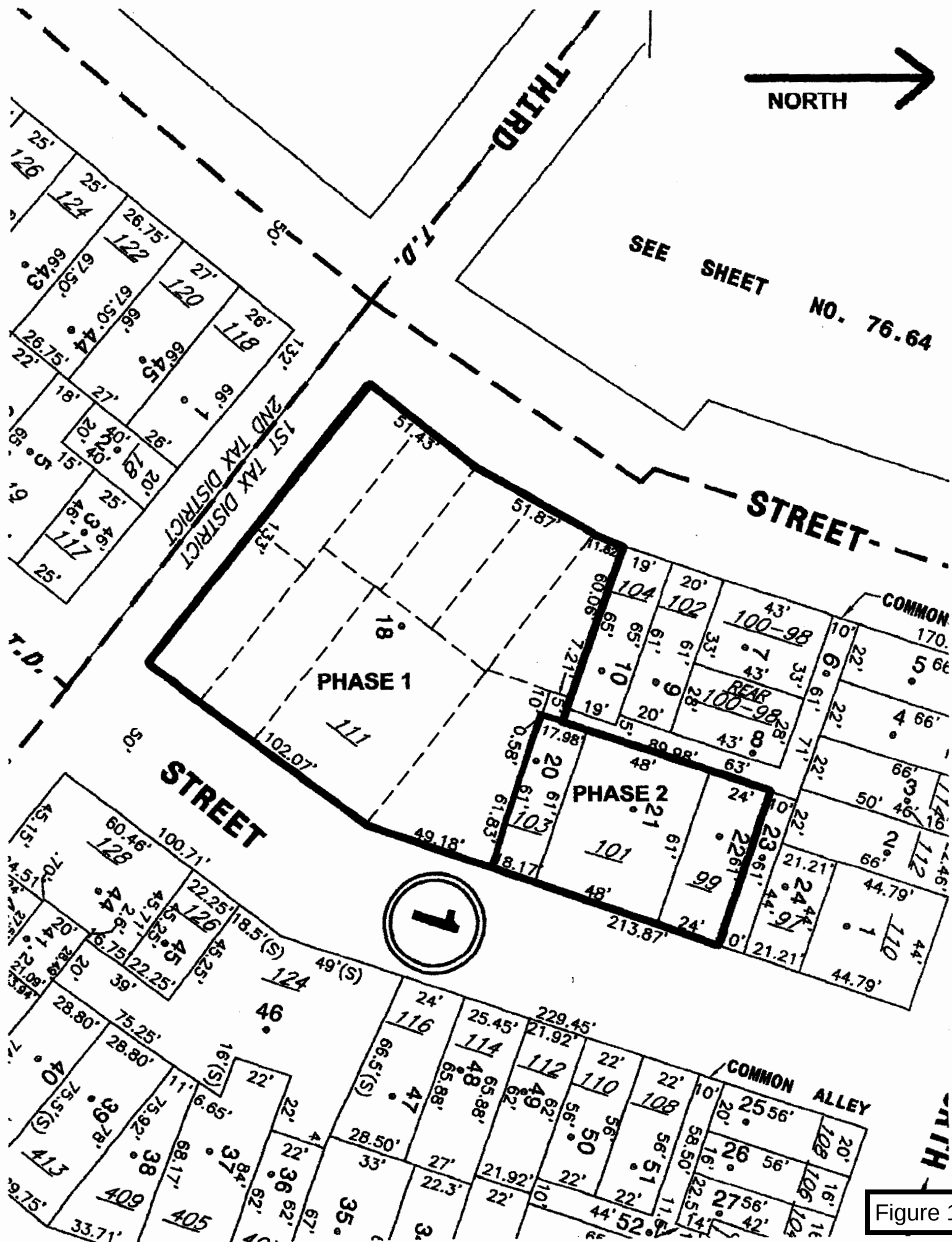


Figure 1



Figure 2

Figure 2

APPENDIX B

Periodic Review Report

Former Jared Holt Manufacturing | Albany, New York

Date Photos Taken: May 28, 2026 | Terracon Project No. JB187006



Photo #1 View southwest along Broad Street



Photo #2 View southwest along Clinton Street



Photo #3 View south across lawn areas from the northern interior of the site



Photo #4 View northeast from the site's entrance at 3rd Avenue



Photo #5 Slightly eroded areas underneath housing decking



Photo #6 Disturbed lawn island assumed to be caused by an animal digging

Periodic Review Report

Former Jared Holt Manufacturing | Albany, New York

Date Photos Taken: May 28, 2026 | Terracon Project No. JB187006



Photo #7 Additional photo from underneath deck



Photo #8 Lawn area interior of site.



Photo #9 Interior lawn area, showing slight erosion facing Northwest



Photo #10 Lawn area of interior of site.



Photo #11 Lawn area interior of sight facing north

APPENDIX C

Enclosure 1

Certification Instructions

I. Verification of Site Details (Box 1 and Box 2):

Answer the three questions in the Verification of Site Details Section. The Owner and/or Qualified Environmental Professional (QEP) may include handwritten changes and/or other supporting documentation, as necessary.

II. Certification of Institutional Controls/ Engineering Controls (IC/ECs)(Boxes 3, 4, and 5)

1.1.1. Review the listed IC/ECs, confirming that all existing controls are listed, and that all existing controls are still applicable. If there is a control that is no longer applicable the Owner / Remedial Party should petition the Department separately to request approval to remove the control.

2. In Box 5, complete certifications for all Plan components, as applicable, by checking the corresponding checkbox.

3. If you cannot certify "YES" for each Control listed in Box 3 & Box 4, sign and date the form in Box 5. Attach supporting documentation that explains why the **Certification** cannot be rendered, as well as a plan of proposed corrective measures, and an associated schedule for completing the corrective measures. Note that this **Certification** form must be submitted even if an IC or EC cannot be certified; however, the certification process will not be considered complete until corrective action is completed.

If the Department concurs with the explanation, the proposed corrective measures, and the proposed schedule, a letter authorizing the implementation of those corrective measures will be issued by the Department's Project Manager. Once the corrective measures are complete, a new Periodic Review Report (with IC/EC Certification) must be submitted within 45 days to the Department. If the Department has any questions or concerns regarding the PRR and/or completion of the IC/EC Certification, the Project Manager will contact you.

III. IC/EC Certification by Signature (Box 6 and Box 7):

If you certified "YES" for each Control, please complete and sign the IC/EC Certifications page as follows:

- For the Institutional Controls on the use of the property, the certification statement in Box 6 shall be completed and may be made by the property owner or designated representative.
- For the Engineering Controls, the certification statement in Box 7 must be completed by a Professional Engineer or Qualified Environmental Professional, as noted on the form.



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



Site No. **B00005**

Site Details

Box 1

Site Name **Former Jared Holt Mfg. Site**

Site Address: Broad & Clinton Streets Zip Code: 12202-
City/Town: Albany
County: Albany
Site Acreage: 0.530

Reporting Period: February 28, 2025 to February 28, 2026

- | | YES | NO |
|---|-------------------------------------|-------------------------------------|
| 1. Is the information above correct? | ☒ | ☐ |
| 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? | ☐ | ☒ |
| 3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))? | ☐ | ☒ |
| 4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? | ☐ | ☒ |
| 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? | ☐ | ☒ |

Box 2

- | | YES | NO |
|---|-------------------------------------|--------------------------|
| 6. Is the current site use consistent with the use(s) listed below?
Industrial | ☒ | ☐ |
| 7. Are all ICs in place and functioning as designed? | ☒ | ☐ |

**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

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
76.73-1-18	Southend Associates, L.P.	Soil Management Plan Ground Water Use Restriction Site Management Plan
The site was regraded and covered with a protective layer of two feet of clean soil over green spaces, that is, areas not occupied by buildings, pavement or sidewalks. The majority of the site was developed by constructing low income housing which included a mix of single family and multifamily residential properties along with the companion driveways, parking areas, and sidewalks. In areas where green spaces were created (such as yards), orange plastic snow fencing was placed beneath the two-foot soil layer, as a demarcation of where the contaminated layer begins. This demarcation will help prevent future contact with contaminated soils.		
76.73-1-20	Southend Associates, L.P.	Ground Water Use Restriction Site Management Plan Soil Management Plan
The site was regraded and covered with a protective layer of two feet of clean soil over green spaces, that is, areas not occupied by buildings, pavement or sidewalks. The majority of the site was developed by constructing low income housing which included a mix of single family and multifamily residential properties along with the companion driveways, parking areas, and sidewalks. In areas where green spaces were created (such as yards), orange plastic snow fencing was placed beneath the two-foot soil layer, as a demarcation of where the contaminated layer begins. This demarcation will help prevent future contact with contaminated soils.		
76.73-1-21	Southend Associates, L.P.	Soil Management Plan Ground Water Use Restriction Site Management Plan
The site was regraded and covered with a protective layer of two feet of clean soil over green spaces, that is, areas not occupied by buildings, pavement or sidewalks. The majority of the site was developed by constructing low income housing which included a mix of single family and multifamily residential properties along with the companion driveways, parking areas, and sidewalks. In areas where green spaces were created (such as yards), orange plastic snow fencing was placed beneath the two-foot soil layer, as a demarcation of where the contaminated layer begins. This demarcation will help prevent future contact with contaminated soils.		
76.73-1-22	Southend Associates, L.P.	Ground Water Use Restriction Site Management Plan Soil Management Plan
The site was regraded and covered with a protective layer of two feet of clean soil over green spaces, that is, areas not occupied by buildings, pavement or sidewalks. The majority of the site was developed by constructing low income housing which included a mix of single family and multifamily residential properties along with the companion driveways, parking areas, and sidewalks. In areas where green spaces were created (such as yards), orange plastic snow fencing was placed beneath the two-foot soil layer, as a demarcation of where the contaminated layer begins. This demarcation will help prevent future contact with contaminated soils.		

Description of Engineering Controls

<u>Parcel</u>	<u>Engineering Control</u>
76.73-1-18	Cover System

Periodic Review Report (PRR) Certification Statements

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

- a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the 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. B00005

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 Colleen O'Keefe at 200 S. Pearl St. Albany, NY 12202
print name print business address

am certifying as managing Agent (Owner or Remedial Party)

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

Colleen M. O'Keefe
Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

1/13/2026
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 Christopher C. Langewisch at 30 Corporate Circle, Suite 201, Albany NY 12203
print name print business address

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



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

Stamp
(Required for PE)

6/24/2026
Date

Enclosure 3
Periodic Review Report (PRR) General Guidance

- I. Executive Summary: (1/2-page or less)
 - A. Provide a brief summary of site, nature and extent of contamination, and remedial history.
 - B. Effectiveness of the Remedial Program - Provide overall conclusions regarding;
 1. progress made during the reporting period toward meeting the remedial objectives for the site
 2. the ultimate ability of the remedial program to achieve the remedial objectives for the site.
 - C. Compliance
 1. Identify any areas of non-compliance regarding the major elements of the Site Management Plan (SMP, i.e., the Institutional/Engineering Control (IC/EC) Plan, the Monitoring Plan, and the Operation & Maintenance (O&M) Plan).
 2. Propose steps to be taken and a schedule to correct any areas of non-compliance.
 - D. Recommendations
 1. recommend whether any changes to the SMP are needed
 2. recommend any changes to the frequency for submittal of PRRs (increase, decrease)
 3. recommend whether the requirements for discontinuing site management have been met.
- II. Site Overview (one page or less)
 - A. Describe the site location, boundaries (figure), significant features, surrounding area, and the nature and extent of contamination prior to site remediation.
 - B. Describe the chronology of the main features of the remedial program for the site, the components of the selected remedy, cleanup goals, site closure criteria, and any significant changes to the selected remedy that have been made since remedy selection.
- III. Evaluate Remedy Performance, Effectiveness, and Protectiveness

Using tables, graphs, charts and bulleted text to the extent practicable, describe the effectiveness of the remedy in achieving the remedial goals for the site. Base findings, recommendations, and conclusions on objective data. Evaluations should be presented simply and concisely.
- IV. IC/EC Plan Compliance Report (if applicable)
 - A. IC/EC Requirements and Compliance
 1. Describe each control, its objective, and how performance of the control is evaluated.
 2. Summarize the status of each goal (whether it is fully in place and its effectiveness).
 3. Corrective Measures: describe steps proposed to address any deficiencies in ICECs.
 4. Conclusions and recommendations for changes.
 - B. IC/EC Certification
 1. The certification must be complete (even if there are IC/EC deficiencies), and certified by the appropriate party as set forth in a Department-approved certification form(s).
- V. Monitoring Plan Compliance Report (if applicable)
 - A. Components of the Monitoring Plan (tabular presentations preferred) - Describe the requirements of the monitoring plan by media (i.e., soil, groundwater, sediment, etc.) and by any remedial technologies being used at the site.
 - B. Summary of Monitoring Completed During Reporting Period - Describe the monitoring tasks actually completed during this PRR reporting period. Tables and/or figures should be used to show all data.
 - C. Comparisons with Remedial Objectives - Compare the results of all monitoring with the remedial objectives for the site. Include trend analyses where possible.
 - D. Monitoring Deficiencies - Describe any ways in which monitoring did not fully comply with the monitoring plan.
 - E. Conclusions and Recommendations for Changes - Provide overall conclusions regarding the monitoring completed and the resulting evaluations regarding remedial effectiveness.
- VI. Operation & Maintenance (O&M) Plan Compliance Report (if applicable)
 - A. Components of O&M Plan - Describe the requirements of the O&M plan including required activities, frequencies, recordkeeping, etc.
 - B. Summary of O&M Completed During Reporting Period - Describe the O&M tasks actually completed during this PRR reporting period.
 - C. Evaluation of Remedial Systems - Based upon the results of the O&M activities completed, evaluated

the ability of each component of the remedy subject to O&M requirements to perform as designed/expected.

- D. O&M Deficiencies - Identify any deficiencies in complying with the O&M plan during this PRR reporting period.
- E. Conclusions and Recommendations for Improvements - Provide an overall conclusion regarding O&M for the site and identify any suggested improvements requiring changes in the O&M Plan.

VII. Overall PRR Conclusions and Recommendations

- A. Compliance with SMP - For each component of the SMP (i.e., IC/EC, monitoring, O&M), summarize;
 - 1. whether all requirements of each plan were met during the reporting period
 - 2. any requirements not met
 - 3. proposed plans and a schedule for coming into full compliance.
- B. Performance and Effectiveness of the Remedy - Based upon your evaluation of the components of the SMP, form conclusions about the performance of each component and the ability of the remedy to achieve the remedial objectives for the site.
- C. Future PRR Submittals
 - 1. Recommend, with supporting justification, whether the frequency of the submittal of PRRs should be changed (either increased or decreased).
 - 2. If the requirements for site closure have been achieved, contact the Departments Project Manager for the site to determine what, if any, additional documentation is needed to support a decision to discontinue site management.

VIII. Additional Guidance

Additional guidance regarding the preparation and submittal of an acceptable PRR can be obtained from the Departments Project Manager for the site.