

Mr. Jesse Gallo Environmental Coordinator Central Hudson Gas & Electric Corporation 284 South Avenue Poughkeepsie, NY 12601

Re: Periodic Review Report | CH – Kingston Gas Works | NYSDEC Site No. C356017 | Kingston, New York File: 1126476.1940113868

Dear Mr. Gallo:

This Periodic Review Report (PRR) was prepared by Ramboll Americas Engineering Solutions, Inc. (Ramboll) at the request of Central Hudson Gas & Electric Corporation (Central Hudson) to document the status of the Engineering Controls (ECs) and Institutional Controls (ICs) established in accordance with the November 2017, updated November 2021, Site Management Plan (SMP) for the Kingston Former Manufactured Gas Plant (MGP) Site (New York State Department of Environmental Conservation (NYSDEC) Site Number: C356017) located in Kingston, New York, and to provide a summary of information generated during the reporting period for the site. The reporting period for this PRR is May 25, 2024 through May 25, 2025. The SMP addressed the means for implementing and periodically inspecting ECs/ICs required by the remedy for the site.

ECS/ICS at the Site Include

Environmental Easement – A series of ICs are required by the Decision Document in the form of an Environmental Easement to: (1) implement, maintain, and monitor Engineering Control Systems; (2) prevent future exposure to remaining contamination; and (3) limit the use and development of the site to commercial or industrial uses only. Adherence to these ICs on the site is required by the Environmental Easement and implemented under the SMP.

Soil Cover – Exposure to remaining MGP-related residuals at the site is managed by a cover system placed over the site. The cover system comprises a minimum of 12 inches of clean soil, asphalt pavement, or concrete slab over shallow excavations and within the gas exclusion area. In areas where *in-situ* solidification (ISS) was performed and MGP-residuals in the form of a monolith are present, the cover comprises a minimum of 48 inches of clean soil. Procedures for monitoring the system are included in Section 4.3 of the SMP. The SMP also addresses severe condition inspections if a severe condition, which may affect controls at the site, occurs.

Sediment Cap –Biota exposure to the remaining MGP-related residuals within the gas utility crossing in Rondout Creek is managed by a composite subaqueous cap. The composite cap comprises a nominal 6-inch-thick sand bedding layer, one layer of reactive core mat (RCM) with OrganoclayTM, a 12-inch thick TRITON® marine mattress, and 6-inches of light stone fill. Procedures for monitoring the system are included in Section 4.4 of the SMP. The SMP also addresses severe condition inspections if a severe condition, which may affect controls at the site, occurs.



EC/IC Inspection Results and On-Going Non-Aqueous Phase Liquid (NAPL) Monitoring Summary

In accordance with the SMP, an annual site-wide inspection was conducted on April 24, 2025. The soil cover system inspection and sediment cap inspection activities were conducted concurrently with the annual site inspection. It was observed during the site-wide inspection that all ICs were in place and remain effective. A copy of the Engineering Controls Monitoring Checklist and photographs are included as Attachment 1 to this PRR.

As documented in Attachment 1, each of the ECs were in place, performing properly, and remain effective. Potential settlement and/or rutting of the soil cover was identified in six areas of the Site. Five of these locations have been noted in previous inspections. The previously noted areas remained generally the same, ranging in depths between 2 and 10 inches. The six location was some noted minor rutting in the southeast corner of the site near RW-04. The soil cover is approximately 5 feet thick in the areas where minor settlement or rutting was observed. There is an area to the north where the cover is 1 foot thick. The location and details of each area are provided in Attachment 1. If settlement in the identified areas continue, corrective measures may be required.

Attachment 1 also includes the results of the bathymetric survey completed on April 24, 2025. Changes in elevation in comparison to the 2017 bathymetric survey within the limits of pipeline crossing cap range between approximately 2.5 inches of erosion and/or settlement, and 2.5 inches of sediment deposits. These ranges are within the thickness of the light stone fill, indicating that the cap remains in place. The Institutional and Engineering Controls Certification Form for the reporting period is included as Attachment 2.

The annual NAPL monitoring event was conducted on August 20, 2024. A heavy sheen was observed in RW-1and a light sheen was observed on the probe tip when gauging RW-2. Detailed results of the NAPL monitoring event are presented in the August 2024 – Annual Monitoring Event Results report included as Exhibit 1.

Certification of ICS and ECS

For each institutional or engineering control identified for the site, I certify that all of the following statements are true:

- The inspection of the site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under my direction;
- The institutional control and/or engineering control employed at this site is unchanged from the date the control was put in place, or last approved by the Department;
- Nothing has occurred that would impair the ability of the control to protect the public health and environment;
- Nothing has occurred that would constitute a violation or failure to comply with any Site Management Plan for this control;
- 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;



- If a financial assurance mechanism is required under the oversight document for the site, the mechanism remains valid and sufficient for the intended purpose under the document;
- Use of the site is compliant with the environmental easement;
- The engineering control systems are preforming as designed and are effective;
- 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 in this report is accurate and complete.

I certify that all information and statements in this certification form 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, Stephen W. Anagnost, of Ramboll, 333 West Washington St Syracuse, NY, am certifying as Owner's/Remedial Party's Designated Site Representative for the site.

No. 068269 NYS Professional Engineer # <u>5/28/2025</u> Date



Yours sincerely

Stephen W. Anagnost, PE

SENIOR PROJECT MANAGER071-E&H ENGINEERING RES

D 315-956-6259 steve.anagnost@ramboll.com

Enclosures: Attachment 1 – Engineering Controls Monitoring Checklist Attachment 2 – Enclosure 2 Site Management Periodic Review Report Notice Institutional and Engineering Controls Certification Form Exhibit 1 – NAPL Monitoring



ATTACHMENT 1 ENGINEERING CONTROLS MONITORING CHECKLIST



Mr. Michael Squire New York State Department of Environmental Conservation Division of Environmental Remediation 625 Broadway, 11th Fl

Re: Annual Monitoring Event Results| CH – Kingston Gas Works | NYSDEC Site No. C356017 | Kingston, New York File: 12678.1940113868

Dear Mr. Squire:

This letter serves to document the annual inspection event conducted on April 24, 2025 at the Central Hudson Gas & Electric Corporation's former manufactured gas plant site located in Kingston, NY (NYSDEC Site No. C356017). In accordance with the 2015 Decision Document and the approved Site Management Plan (November 2017; updated in November 2021), the annual inspection included:

- Site Wide Inspection
- Soil Cover System Inspection
- Sediment Cap System Inspection

The associated inspection forms are attached.

Yours sincerely

Stephen (1)

Stephen W. Anagnost, PE SENIOR PROJECT MANAGER071-E&H ENGINEERING RES

D 315-956-6259 steve.anagnost@ramboll.com

Date May 28, 2025

Ramboll 333 West Washington Street Syracuse, NY 13202 USA

T 315-956-6100 F 315-463-7554 https://ramboll.com



Sec nece The mon 1.	e Monitoring Performed: April 24, 2025 tion I: Engineering Controls (to be comp essary). site engineering controls consist of a soil of hitored to verify their integrity and to iden Observation Are there any eroded areas or areas of scour? If yes, describe.	cover an	the field	at the til	uire maintenance.
nece The mon 1.	assary). site engineering controls consist of a soil of itored to verify their integrity and to iden Observation Are there any eroded areas or areas of	cover an tify area	nd a sedi as that n	iment co nay req	ap. The engineering controls will be wire maintenance.
The mor 1. 2.	site engineering controls consist of a soil of hitored to verify their integrity and to iden Observation Are there any eroded areas or areas of	tify area	as that r	nay req	uire maintenance.
<u>mor</u> 1. 2.	nitored to verify their integrity and to iden Observation Are there any eroded areas or areas of	tify area	as that r	nay req	uire maintenance.
1. 2.	Observation Are there any eroded areas or areas of				
2.	Are there any eroded areas or areas of	Ye	No		Commente
2.				Z	Comments
	scour? If yes, describe.		Х		No areas of erosion or scour observed
					within limits of the soil cover or sediment
					cap
3.	Are there any areas of settlement? If	Х			The soil cover remains in place. There
3.	yes, describe.				are a few areas of minor
3.					settlement/rutting noted. Refer to the attached photolog.
	Is there any ponded water on the		Х		
	ground surface? If yes, describe.				
	Are there any areas of accumulated		Х		
	large debris or obstructions (e.g., logs,				
	railroad ties, etc.)? If yes, describe type				
	and location				
5.	Scour or holes within the limits of		Х		See bathymetric survey, bathymetric
	sheeting over sediment cap based on				comparison (Figure 1), and additional
	bathymetric survey? If yes, describe.				information
6.	Is the RCM of the sediment cap			Х	
	exposed within the limits of sheeting				
_	based on diver survey (if necessary)?	V			Please refer to Section II and the attached
/.	Are photographs attached? If yes, list	X			
	photograph numbers and provide description in Section II.				Photo Log
8	Are the Site records complete and up	X			Records located at 284 South Avenue
0.	to date, and stored at the CHGE office?	Λ			Poughkeepsie, NY 12601 and the
	to date, and stored at the Grid Onice.				Environmental Easement is recorded
					with the Ulster County Clerk.



Soil Cover: The soil/stone cover remains intact but there are areas of noted minor settlement or rutting as shown in photos 2,5, 6, 8, 9, and 11 through 13. The noted settlements range between 2 and 10 inches deep. Areas of vegetative cover show established vegetation (Photo 14). Areas of asphalt or concrete show no signs of deterioration (Photo 15). The settlement will continue to be monitored and if required, corrective actions will be implemented.

Sediment Cap: Based on the results of the bathymetric survey completed on April 24, 2025, changes in elevation in comparison to the 2017 bathymetric survey within the limits of pipeline crossing cap range between approximately 2.5 inches of erosion and/or settlement, and 2.5 inches of sediment deposits. These ranges are within the thickness of the light stone fill, signaling that the cap remains in place. The bathymetric survey and bathymetric comparison (Figure 1) are attached.

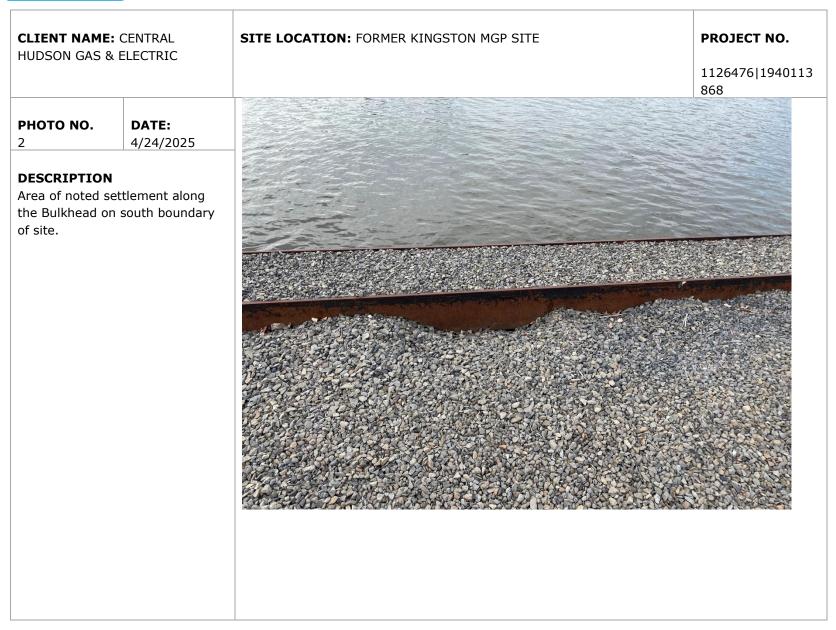
Section II. Photographs (Attach photographs if applicable. Use additional pages as necessary)				
Photograph	Date	Photograph Description	Direction Facing	
1	4/24/25	Bulkhead on south boundary of Site. Signs of settlement or rutting noted in minimal areas. Increased vegetation noted as compared to previous year.	West	
2	4/24/25	Area of noted settlement along the bulkhead on south boundary of Site.	South	
3	4/24/25	Bulkhead on south boundary of Site facing east.	East	
4	4/24/25	Vessels moored adjacent to Site on Rondout Creek limiting extents of bathymetric survey.	West	
5	4/24/25	Limits of previously noted settlement at southeast portion of the Site between bulkhead and fence line.	East	
6	4/24/25	Photo showing approximately 5 inches of settlement within southeast portion of the Site between the bulkhead and fence line.	West	
7	4/24/25	Cover within exclusion zone	Southwest	
8	4/24/25 4/24/25	Limits of previously noted settlement at southeast portion of Site within the fence line.	East	
9	4/24/25	Photo showing approximately 4 inches of settlement at southeast portion of the Site within fence line.	East	
10	4/24/25	View of the cover system from northwest corner.	Southeast	
11	4/24/25	Northside of Site, just west of exclusion zone where previously noted minor depressions/settlement is located.	North	
12	4/24/25	Area of rutting at southeast corner of site between fence line and recovery well RW-04 and fence line.	West	
13	4/24/25	Area of rutting at southeast corner of site between the fence line and recovery well RW-04.	South	
14	4/24/25	Soil cover on property west of Central Hudson Property.	West	



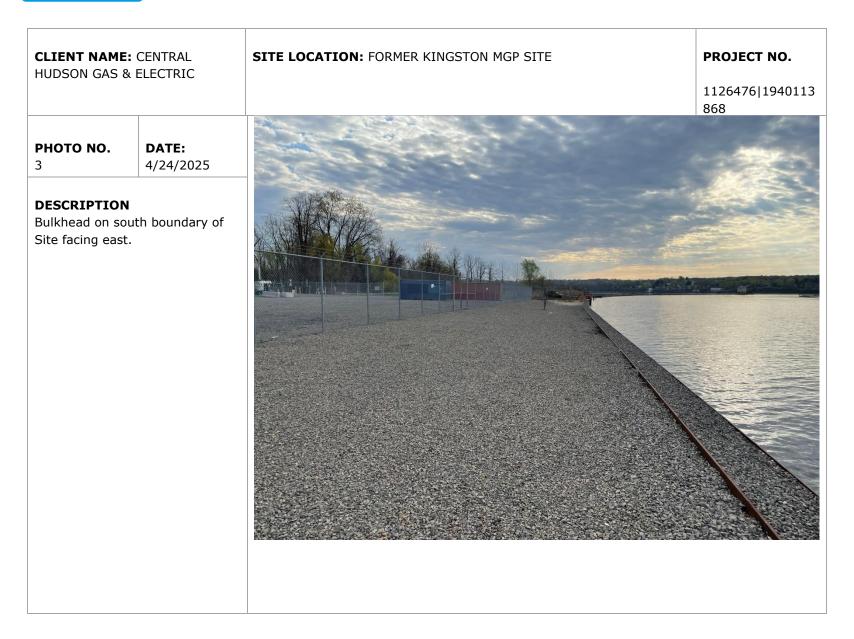
15	4/24/25	Soil cover east of the Central Hudson property.	North
16	4/24/25	Northern boundary of the Site,	West
17	4/24/25	View of the cover system from southwest corner.	Northeast
18	4/24/25	Site plan showing approximate location of noted settlement/rutting.	N/A
Section	III. Additional Fie	ld Observations	
	IV. Certification	a contribution to a noted of our the manifest	ntormad in coorden
vith the	Site Management H	y certify that, except as noted above, the monitoring was pe Plan – Former Kingston Manufactured Gas Plant Site, Kings we above information is true and correct to the best of my ka	ton, New York, dated
	orinted) Victor War	ner Title: Project Manager	•
ignatur	Timb ?	Date: 5/28/25	

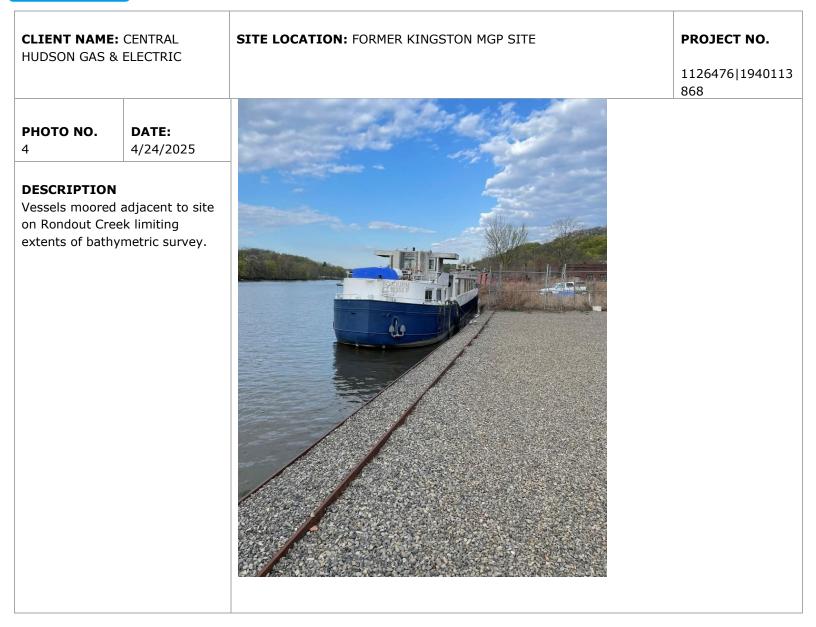
		ENVIRONMENT & HEALTH
: CENTRAL ELECTRIC	SITE LOCATION: FORMER KINGSTON MGP SITE	PROJECT NO. 1126476 19401138
		68
DATE: 4/24/2025		
l uth boundary of settlement noted in Increased ed as compared to		
	DATE: 4/24/2025 uth boundary of settlement noted in Increased	DATE: 4/24/2025 uth boundary of settlement noted in Increased

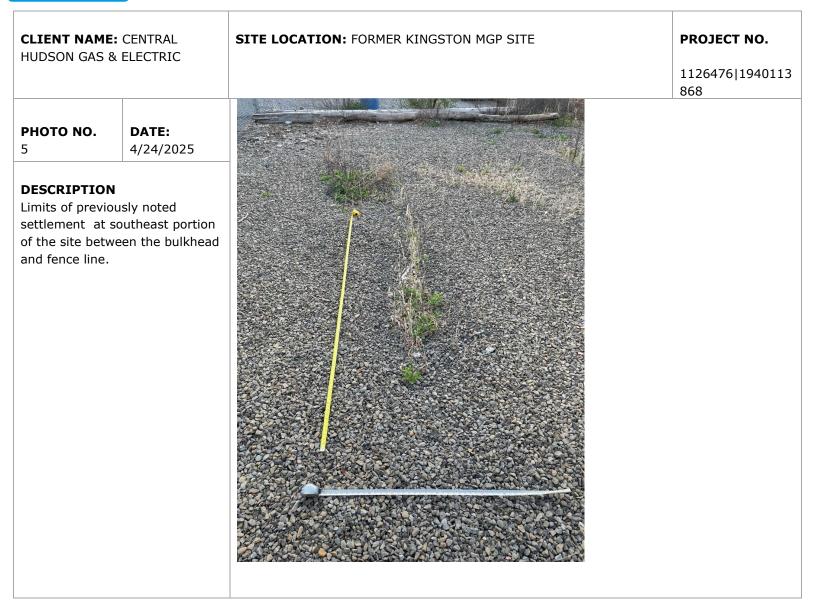




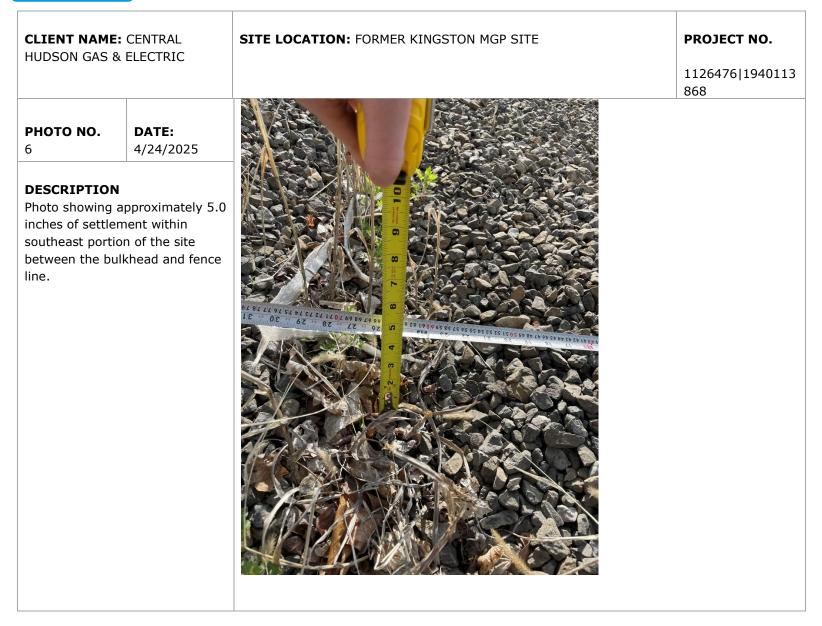


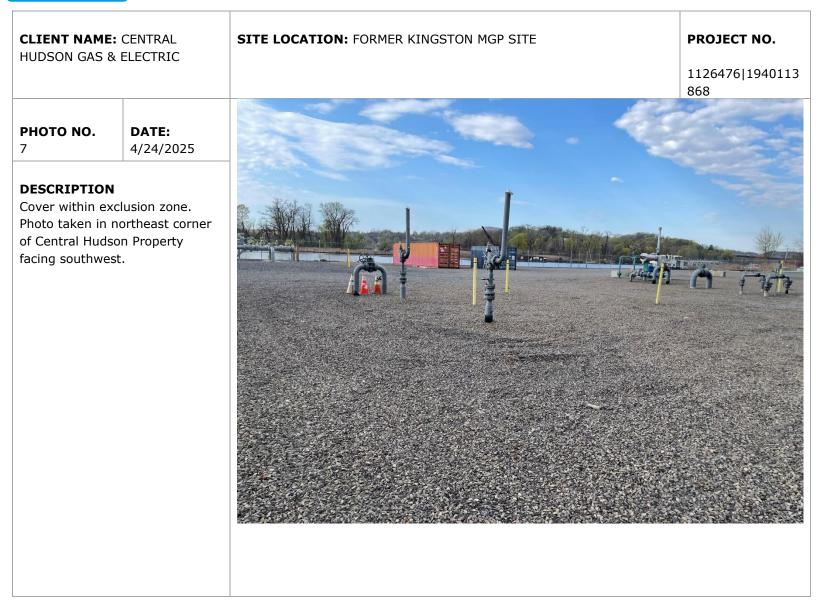


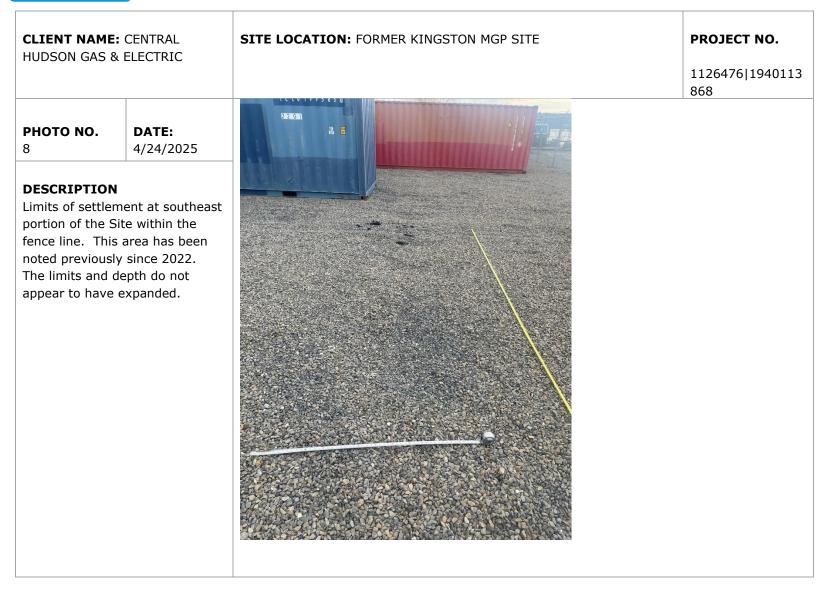






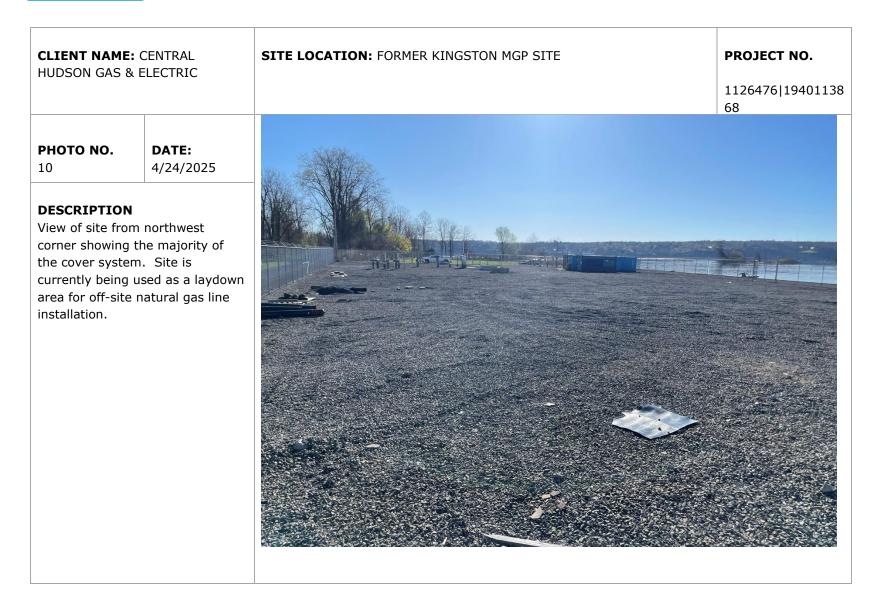


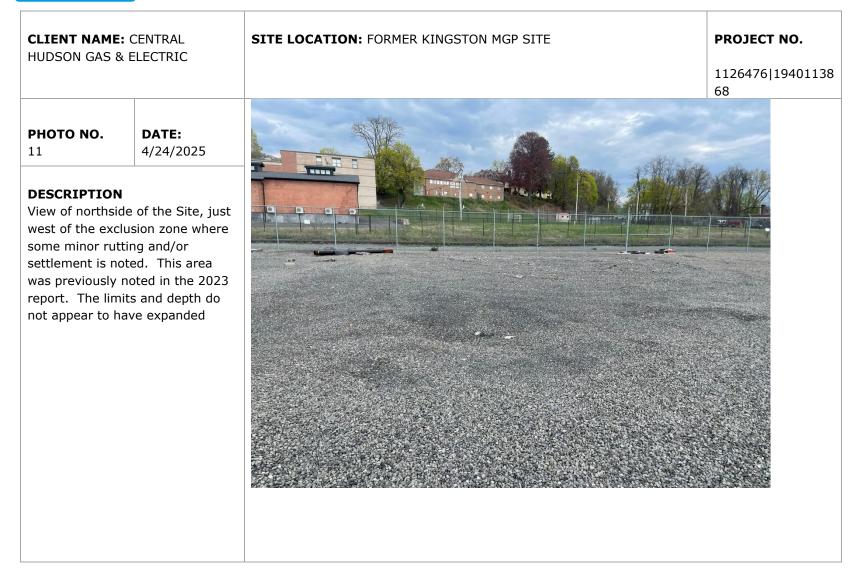


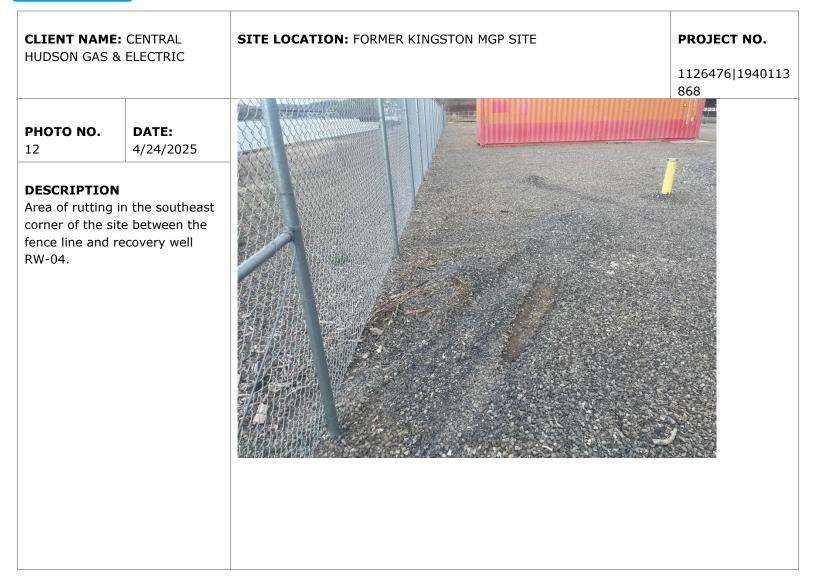


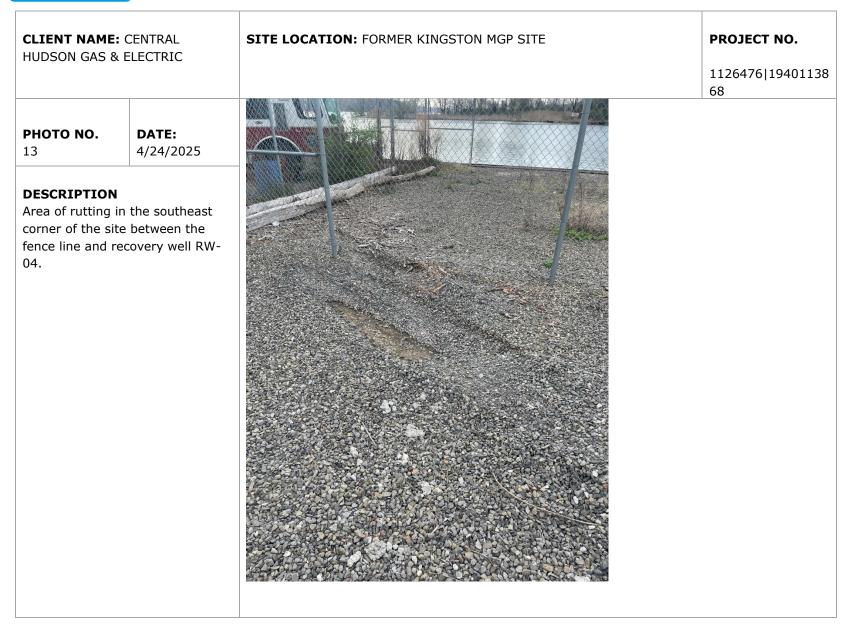
CLIENT NAME: CENTRAL HUDSON GAS & ELECTRIC		SITE LOCATION: FORMER KINGSTON MGP SITE	PROJECT NO. 1126476 1940113 868	
	approximately 4 ment at southeast			

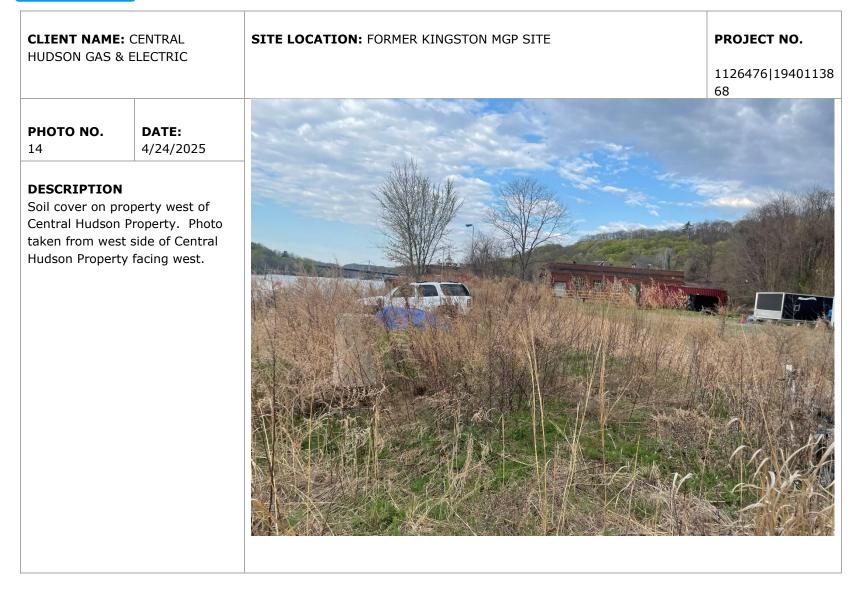




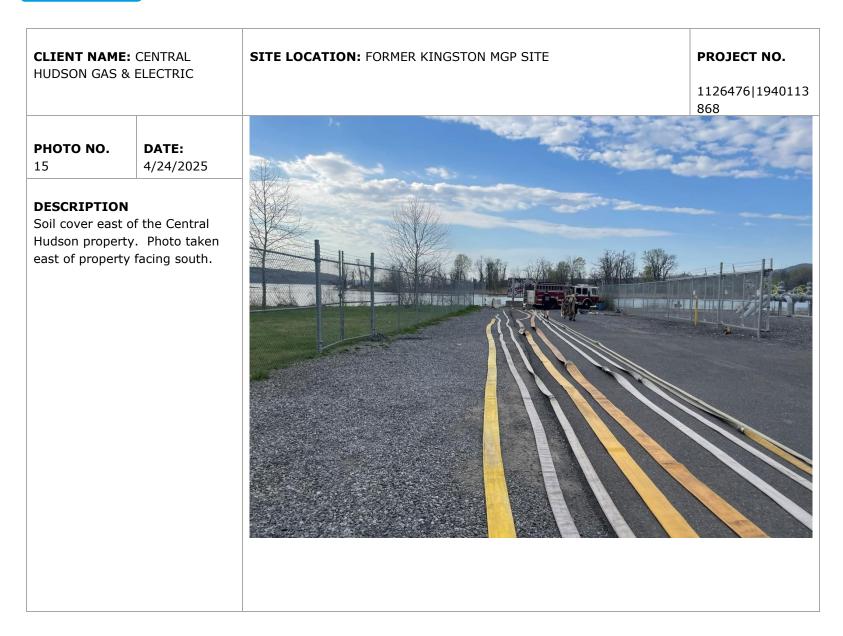




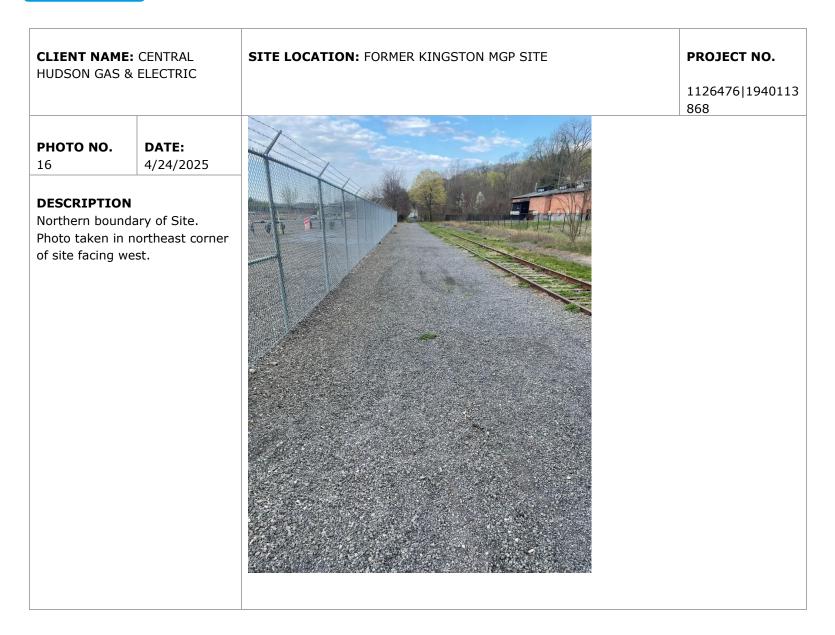




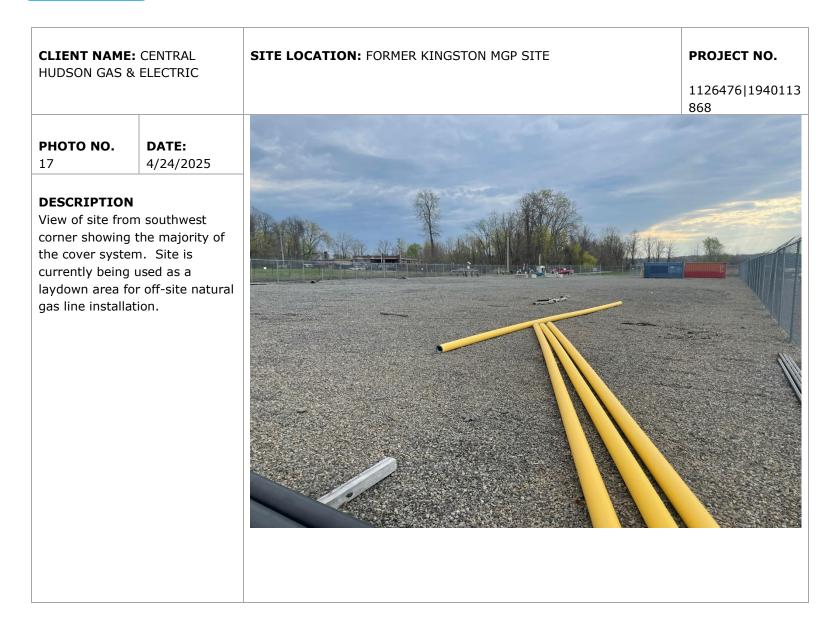




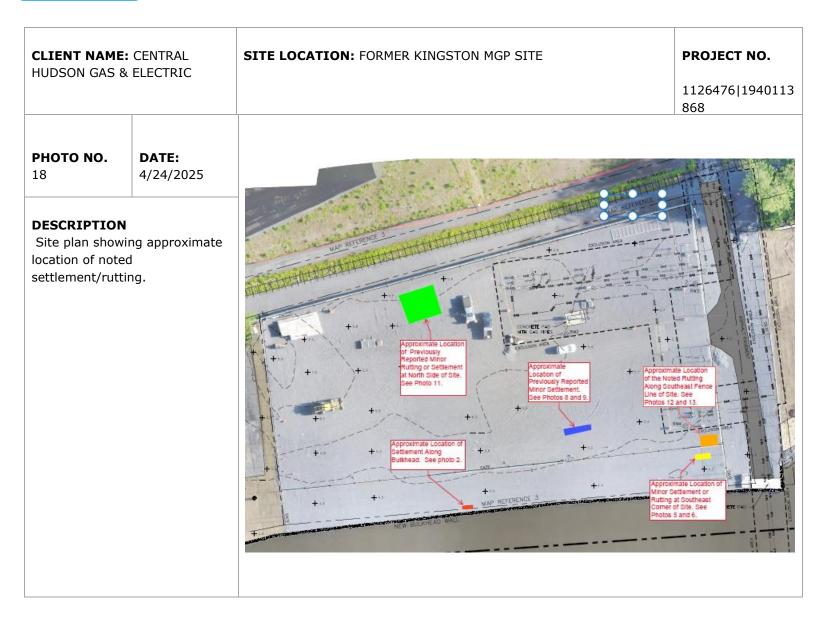














ATTACHMENT 2 ENCLOSURE 2 SITE MANAGEMENT PERIODIC REVIEW REPORT NOTICE INSTITUTINAL AND ENGINEERING CONTROLS CERTIFICATION FORM



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



Sit	e No.	C356017	Site	Details		Box 1	
Sit	e Name CH	- Kingston Gas	s Works				
City Co	e Address: N y/Town: Kin unty: Ulster e Acreage: 1	igston	Zip Code: 1240	01			
Re	porting Peric	od: May 25, 2023	3 to June 26, 20	25			
						YES	NO
1.	Is the inforr	mation above cor	rrect?			X	
	If NO, inclu	de handwritten a	above or on a se	eparate sheet.			
2.		or all of the site p nendment during			erged, or undergone a		X
3.		been any change RR 375-1.11(d))′		te during this Repo	orting Period		X
4.		ederal, state, and e property during			ischarge) been issued		X
					nentation or evidence his certification form		
5.	Is the site c	currently undergo	oing developmer	nt?			X
						Box 2	
						YES	NO
6.		nt site use consi al and Industrial	stent with the us	se(s) listed below?		X	
7.	Are all ICs	in place and fund	ctioning as desig	gned?	X		
	IF TH				, sign and date below Otherwise continue.	and	
AC	Corrective M	easures Work Pl	lan must be sub	mitted along with	this form to address t	hese iss	ues.
Sig	nature of Ow	ner, Remedial Pa	arty or Designate	d Representative	Date		

SITE NO. C356017		Box 3
Description of Institu	tional Controls	
Parcel 56.36-01-18	<u>Owner</u> Central Hudson Gas & Electric (Institutional Control Corp
		Ground Water Use Restriction Soil Management Plan Landuse Restriction Monitoring Plan Site Management Plan IC/EC Plan
The property may be used for uses as described in 6 NYC		in 6 NYCRR Part 375.1(g)(2)(iii) or Industrial
determined by the NYSDOF	or the Ulster County Department	without necessary water quality treatment as of Health to render it safe for use as drinking I obtain written approval to do so from the
Monitoring must be perform	ed as defined in the SMP; and	
All future activities on the pr accordance with the SMP.	operty that will disturb remaining c	contaminated material must be conducted in
		Box 4
Description of Engine	eering Controls	
Parcel 56.36-01-18	Engineering Control	
30.30-01-10	Subsurface Barriers Monitoring Wells Cover System	
The cover system is comprise	sed of a minimum of one foot of cle	by a cover system placed over the site. ean soil, asphalt pavement, gravel, or stem is comprised of a minimum of 4
composite subaqueous cap.		he Rondout Creek is managed by a of a nominal 6-inch thick sand bedding ck TRITON® marine mattress.
subaqueous cap. The comp		dout Creek is prevented by a composite nch thick sand bedding layer, one layer mattress.
composite subaqueous cap.		he Rondout Creek is managed by a of a nominal 6-inch thick sand bedding IRITON marine mattress.

			Box 5
	Periodic Review Report (PRR) Certification Statements		
	I certify by checking "YES" below that:		
	 a) the Periodic Review report and all attachments were prepared under the dire reviewed by, the party making the Engineering Control certification; 	ection of,	, and
	b) to the best of my knowledge and belief, the work and conclusions described are in accordance with the requirements of the site remedial program, and gene		
	engineering practices; and the information presented is accurate and compete.	YES	NO
		X	
	For each Engineering control listed in Box 4, I certify by checking "YES" below that all following statements are true:	of the	
	(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 De	epartmer	nt;
	(b) nothing has occurred that would impair the ability of such Control, to protec the environment;	t public h	nealth an
	(c) access to the site will continue to be provided to the Department, to evaluat remedy, including access to evaluate the continued maintenance of this Contro		
	(d) nothing has occurred that would constitute a violation or failure to comply w Site Management Plan for this Control; and	ith the	
	(e) if a financial assurance mechanism is required by the oversight document for mechanism remains valid and sufficient for its intended purpose established in the		
		YES	NO
		X	
	IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue		
4	A Corrective Measures Work Plan must be submitted along with this form to address	these is	sues.
-	Signature of Owner, Remedial Party or Designated Representative Date		

Γ

	IC CERTIFICATIONS SITE NO. C356017	
		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 statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 21 Penal Law.	
	Central Hudson Gas & Electric Corp.	
	I Mark L. McLean at 284 South Ave., Poughkeepsie, NY 12601	
	print name print business address	1
	am certifying as Owner (Owner or Re	emedial Party)
-	for the Site named in the Site Details Section of this form. Signature of Owner, Remedial Party, or Designated Representative Date Rendering Certification	

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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 Stephen Anagnost	at Ramboll, 333 West	t Washington Street, Syracuse, NY 13221
print name	print busin	ness address
am certifying as a Qualified Environr	nental Professional for the _.	Owner (Owner or Remedial Party)
Stiphe (W) Amagnet Signature of Qualified Environmenta the Owner or Remedial Party, Rende		Appropried for PE)



EXIHIBIT 1 2024 NAPL MONITORING REPORT



Submitted via email

August 21, 2024

Michael Squire New York State Department of Environmental Conservation Division of Environmental Remediation 625 Broadway, 11th Floor Albany, NY 12233-7014

Re: Kingston MGP Site (C356017) August 2024 – Annual Monitoring Event Results

Dear Mr. Squire:

This letter serves to document the results of the annual monitoring event conducted on August 20, 2024 at Central Hudson Gas & Electric Corporation's (Central Hudson's) former manufactured gas plant (MGP) site located in Kingston, NY (Figure 1). In accordance with the June 2015 Decision Document, and approved November 2017 Site Management Plan (SMP) [revised in 2021], four monitoring wells were installed at the site to monitor for the presence of non-aqueous phase liquid (NAPL). The monitoring wells were installed within an area that was precluded from in-situ stabilization (ISS) remediation due to the location of active gas infrastructure.

<u>Results</u>

Depth to water ranged from 4.53 feet below top of casing (fbtoc) to 4.88 fbtoc in monitoring wells RW-2 and RW-1, respectively (Table 1). A heavy sheen was observed in RW-1 (approximately 0.10') and a light sheen was observed on the probe tip when gauging RW-2; however, NAPL thickness was not measurable.

The next monitoring event is tentatively scheduled to be performed in August 2025. Please contact me at (845) 486-5641 or jgallo@cenhud.com if you have any questions.

Sincerely,

Jessé N. Gallo Environmental Coordinator

Attachments ec. Amen Omorogbe – NYSDEC Kristin Kulow – NYSDOH Mark McLean, Central Hudson Table

Table 1 Monitoring Well Gauging Data August 2024

Well ID	DTW	DTP	DTB
RW-1	4.88	0.1*	20.98
RW-2	4.53	Trace*	19.65
RW-3	4.55	ND	21.70
RW-4	4.72	ND	21.25

Notes:

* - Sheen observed on probe tip

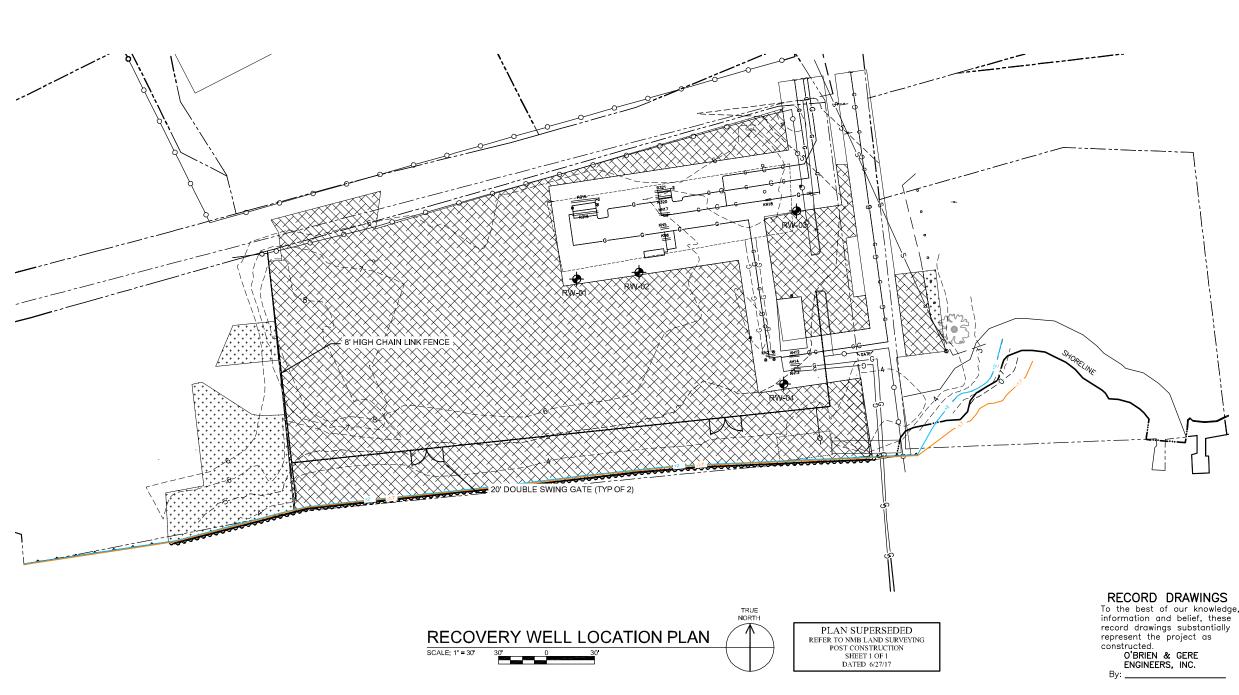
DTW - Depth to water (feet below top of casing)

DTP - Depth to product (feet below top of casing)

DTB - Depth to bottom (feet below top of casing)

ND - Not detected

Figure



RECOVERY WELL TABLE							
WELL ID	NORTHING	EASTING	GRADE ELEVATION (FEET)	TOP OF CASING ELEVATION (FEET)	DEPTH OF WELL (FEET BGS)		
RW-1	1125862.194	636244.317	6.5	8.6	19		
RW-2	1125866.377	636283.183	6.1	8.0	18		
RW-3	1125904.711	636381.694	5.7	7.9	19		
RW-4	1125796.653	636373.703	5.3	7.6	19		

LEGEND:

GRAVEL AREA VEGETATED SURFACE RECOVERY WELL LOCATION . RW-01

THIS DRAWING WAS PREPARED AT THE SCALE INDICATED IN THE TITLE BLOCK. INACCURACIES IN THE STATED SCALE MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED WHANY MEANS. USE THE GRAPHIC SCALE BAR IN THE THLE BLOCK TO DETERMINE THE ACTUAL SCALE OF THIS DRAWING.

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS ACTING UNDER THE DIRECTION OF A LICENSED ENGI-NEER, TO ALTER THIS DOCUMENT.



Э,						
	0	11/0/17	RECORD DRAWING		BEW	
	NO.	11/2/17 DATE	REVISION		INIT.	
	SCALE AS NOTED					
		GENERAL RECOVERY WELL				
	LOCATION PLAN					
	DES	IGNED BY	CHECKED BY		1	