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# PERIODIC REVIEW REPORT APRIL 2023 – APRIL 2026

## **Sawmill Place Remediation Area B (SRA-B)**

10 Sawmill Place, Wallkill  
Town of Shawangunk, Ulster County, NY

NYSDEC Site Code: C356043

### Prepared For:

Watchtower Bible & Tract Society of New York, Inc.  
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Patterson, NY 12863

### Prepared By:

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HRP #: WES5902.WM

Issued On: May 11, 2026



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## General Information

### Project/Site Information:

Sawmill Place Remediation Area B (SRA-B)  
(Site ID# C356043)  
10 Sawmill Place, Wallkill  
Town of Shawangunk, Ulster County, NY

### Consultant Information:

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### Client Information:

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**Report Date:** May 11, 2026

**Report Author:**



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Elaine Yu  
Project Consultant

## Certification, Limitations, and Statement of Independence

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

- (a) 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 DER;
- (b) Nothing has occurred that would impair the ability of such a control to protect public health and the environment;
- (c) Nothing has occurred that would constitute a violation or failure to comply with any Site Management Plan for this control; and
- (d) Access to the site will continue to be provided to DER to evaluate the remedy, including access to evaluate the continued maintenance of this control.

Environmental Contractor: HRP Associates, Inc.

By:



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Thomas Seguljic, PE, PG  
Vice President

## **LIST OF ABBREVIATIONS**

BCP	Brownfield Cleanup Program
bgs	below ground surface
COC	Contaminants of Concern
DER	Division of Environmental Remediation
DUSR	Data Usability Summary Report
EC	Engineering Controls
HRP	HRP Associates, Inc.
IC	Institutional Controls
LEL	Lower Explosive Limit
LTMP	Long Term Monitoring Plan
mg/kg	milligram per kilogram
NAPL	Non Aqueous Phase Liquid
NYSDEC	New York State Department of Environmental Conservation
O&M	Operations and Maintenance
PCB	Polychlorinated biphenyl
PID	Photoionization Detector
PRR	Periodic Review Report
QC	Quality Control
RA	Remedial Action
RAOs	Remedial Action Objectives
RACR	Remedial Action Completion Report
RI	Remedial Investigation
ROD	Record of Decision
Site	Mechanicville Light Industrial Park Site # 546050
SMP	Site Management Plan
SVI	Soil Vapor Intrusion
SVOC	Semi-Volatile Organic Compound
TAL	Total Analyte List
TOC	Total Organic Compound
TOGS	Technical and Operations Guidance Series

ug/L      Micro grams per liter or parts per billion  
VCP      Voluntary Cleanup Program  
VOC      Volatile Organic Compound

## 1.0 EXECUTIVE SUMMARY

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This document is required as an element of the remedial program at the Sawmill Place Remediation Area B (SRA-B) (hereinafter referred to as the "Site") under the New York State (NYS), Brownfield Cleanup Program (BCP) administered by New York State Department of Environmental Conservation (NYSDEC). The Site was investigated in accordance with a Brownfield Cleanup Agreement, NYSDEC Site Code # C356043, which was executed on January 28, 2011. The Site remediation was conducted in conformance with *DER-10: Technical Guidance for Site Investigation and Remediation* (NYSDEC, May 2010). This report is intended to meet the requirements of the Site Management Plan (SMP) for the Site.

A Periodic Review Report (PRR) will be submitted to the Department every three (3) years. The report will be prepared in accordance with NYSDEC DER-10 and submitted within 45 days of the end of each certification period.

### 1.1 Site Summary

The Site, located at 10 Sawmill Place, Wallkill, NY, is currently owned by Watchtower Bible and Tract Society of New York, Inc. ("Watchtower") (**Figure 1**). The 1.94-acre Site is part of a larger property in a rural area that covers approximately 1,141 acres, which Watchtower has owned and operated for religious, not-for-profit use since the 1960's. The undeveloped Site is a relatively flat grassy area with a slight slope towards a drainage area to the south. In the vicinity of the Site is a sawmill, materials sorting area, apiary, aggregate/equipment storage, and a compost shed.

### 1.2 Nature and Extent of Impacts

- The primary contaminants of concern ("COCs") include TAL metals in the surface soils (depth of 0-2 feet). No significant or widespread impacted areas were identified within the surface soil samples collected at the Site or off-Site. The surface soil samples collected at the Site meet the Restricted Residential Use Criteria.
- The primary COCs include volatile organic compounds (VOCs) and metals in the subsurface soils (depth below 2 feet). VOC and metals COCs within the subsurface soils appear to be centrally located on the Site, at a depth of approximately 5 to 7 feet below grade and meet NYSDEC Part 375-6 Soil Cleanup Objective (SCO) for Commercial Standards.
- The primary COCs include VOCs and metals in the groundwater. Based on the topography of the Site, the flow direction of the perched aquifer is anticipated to be southeast.

### 1.3 Remedial History

The Site was remediated in accordance with the NYSDEC Decision Document dated December 18, 2013. The following are the components of the selected remedy:

1. Maintenance of a soil cover system consisting of existing surface soils and grassy cover to prevent human exposure to remaining impacted soil/fill remaining at the Site;

2. Execution and recording of an Environmental Easement to restrict land use and prevent future exposure to any COCs remaining at the Site;
3. Compliance with the Environmental Easement and the SMP by the Grantor and the Grantor's successors and assigns;
4. Development and implementation of a Site Management Plan for long term management of remaining contamination as required by the Environmental Easement, which includes plans for: (1) Institutional Controls (ICs) and Engineering Controls (ECs), (2) monitoring, and (3) reporting; and
5. Period certification of the ICs and ECs listed above.

The remedy for this Site was performed as a single project, and no interim remedial measures, operable units or separate construction contracts were performed.

#### **1.4 Effectiveness of Remedial Program**

During the 2021 Site inspection and sampling event, monitoring well MW-8 was found to be damaged and unusable. Monitoring well MW-9 was successfully sampled during the 2021 sampling event. However, historic VOC and SVOC results from MW-8 and MW-9 indicate VOC and semivolatle organic compound (SVOC) constituents are consistently below NYSDEC standards or have become asymptotic at acceptable levels.

Following the 2017 groundwater monitoring event, it was determined by the NYSDEC that metals and PCB constituents met Remedial Action Objectives (RAOs) for the Site, and sampling of these constituents was no longer required. Based on the site inspection the Site cover remains intact and all Site ICs remain in place, with the exception of groundwater sampling at MW-8. Via the continued monitored natural attenuation at the Site, the remedial program has achieved the remedial objectives for the Site since VOC and SVOC constituents are consistently below NYSDEC standards or have become asymptotic at acceptable levels.

#### **1.5 Compliance**

Because of the damaged and unusable well at MW-8, compliance with all the groundwater sampling elements in the 2021 Revised SMP could not be met. HRP recommends decommissioning MW-8 in accordance with the protocols outlined in NYSDEC's CP-43: Groundwater Monitoring Well Decommissioning Policy and amending the Revised SMP to eliminate the requirement for annual groundwater sampling at MW-8. Based on historic groundwater sampling results, installation of a replacement monitoring well is not necessary. The IC/EC certifications and a Corrective Measures Work Plan which addresses this issue, are included in **Appendix A**.

No other areas of non-compliance were identified with regard to the SMP, and ICs and ECs remain in place.

## 1.6 Recommendations

Based on the findings of the 2021 site inspection, and review of historic groundwater sampling results, HRP recommends taking the following steps:

- Decommission MW-8 in accordance with the protocols outlined in NYSDEC's CP-43: Groundwater Monitoring Well Decommissioning Policy. As outlined in the 2021 SMP, monitoring well decommissioning will only be performed with the approval of the NYSDEC.
- Amend the Revised SMP to eliminate the requirement for annual groundwater sampling at MW-8. Based on historic groundwater sampling results, installation of a replacement monitoring well is not necessary.

We do not currently recommend any changes to the SMP. Per the Revised SMP dated May 18, 2021 and accepted by the NYSDEC by letter dated August 26, 2021 discussed below, PRRs will be submitted on a three year schedule. Based on the approved schedule, the next PRR is set to be submitted in May 2029.

The groundwater monitoring program established by the original approved SMP was conducted over a period of 5 years (based on historical trends for onsite results), with semiannual monitoring for the first year, followed by annual monitoring thereafter. Each sampling event included the submittal of a report detailing the analytical results. Following the completion of the initial 5 years of the monitoring program, NYSDEC requested the continuation of annual monitoring.

The requirements in the 2021 Revised SMP state that the groundwater monitoring program will continue to be conducted over a three-year period (2021-2023). Monitoring will continue until permission to discontinue is granted in writing by the NYSDEC.

## 2.0 **SITE OVERVIEW**

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The Site is located in the Town of Shawangunk, County of Ulster, New York and is identified as part of Section 99.004, Block 1, Lot 11 on the Town of Shawangunk Tax Map. The Site location is depicted on **Figure 1**. The Site is an approximately 1.94-acre area bounded by vacant grassland to the west, SRA-A to the north, vacant grassland to the east, and a materials sorting area and sawmill to the south (see **Figure 2**). The undeveloped Site is a relatively flat grassy area with a slight slope towards a drainage area to the south (see **Figure 2**).

Based upon investigations conducted to date, the primary COCs at the Site include VOCs (i.e. Trichlorofluoromethane/Freon 11, m,p-Xylene, Acetone) and metals (i.e. Aluminum, Chromium, Iron and Manganese). These COCs were detected within surface soils, subsurface soils and groundwater over NYSDEC standards, guidance and criteria (Part 375-6 SCO's and Division of Water, TOGS 1.1.1.). However, no significant or widespread impacted areas were identified within the surface soil samples collected at the Site or off-Site. The surface soil samples collected at the Site meet the Restricted Residential Use Criteria and are being utilized as a soil cover. Due to the presence of "clean" surface soils, up to at least a depth of 2 feet below grade, as part of the remedy for this Site, the NYSDEC has allowed the use of the in-place soils to act as a soil cover. As such, demarcation layer was not required. VOC and metals COCs within the subsurface soils appear to be centrally located on the Site, at a depth of approximately 5 to 7 feet below grade (See **Figure 3**). In addition, while VOC and metal COCs remain in the Site groundwater, they are not expected to migrate off-Site.

The selected remedy for the Site was the implementation of ECs and ICs, including the following:

### Institutional Controls:

- **Groundwater Use Restriction:** The use of groundwater underlying the controlled property as described in the Environmental Easement is prohibited without treatment to render it safe for use as drinking water for industrial purposes, and the user must first notify and obtain written approval from the NYSDEC and the Ulster County Department of Health.
- **Land Use Restriction:** The controlled property as described in the Environmental Easement is limited to restricted-residential use. Vegetable gardens and farming on the Site is prohibited.
- **Site Management Plan:** Any intrusive activities, including building renovation/expansion, subgrade utility line repair/relocation, and new construction which will cause a disturbance beneath the 2 feet topsoil cover must be conducted in accordance with the NYSDEC approved SMP and Revised SMP.
- **Monitoring Plan:** Monitor, maintain and replace as necessary and as required by the NYSDEC any on-site Groundwater Monitoring Wells as depicted on Schedule A Survey and set forth in Section 3.3 of the NYSDEC approved SMP and Revised SMP. However, as noted, HRP recommends decommissioning MW-8 in accordance with the protocols outlined in NYSDEC's CP-43: Groundwater Monitoring Well Decommissioning Policy and amending revising the Revised SMP to eliminate the requirement for annual groundwater

sampling at MW-8. Based on historic groundwater sampling results, installation of a replacement monitoring well is not necessary.

#### Engineering Controls:

- **Cover System:** No significant or widespread impacted areas were identified within the surface soil samples collected at the Site. The surface soil samples collected at the Site meet the Restricted Residential Use Criteria and will be utilized as a soil cover. Due to the presence of "clean" surface soils, up to at least a depth of 2 feet below grade, the NYSDEC has allowed the use of the in-place soils to act as a soil cover. As such, a demarcation layer was not required. Any fill material brought to the Site will meet the requirements for the identified Site use as set forth in 6 NYCRR Part 375-6.7(d).
- **Vapor Mitigation:** Should a building(s) be erected, prior to construction, a Soil Vapor Intrusion (SVI) Investigation shall be conducted in accordance with the applicable guidance in effect at the time of the investigation. If the results of the SVI investigation demonstrate a need for a sub-slab vapor extraction system, an appropriate system shall be designed, constructed and maintained.
- **Groundwater Monitoring Wells:** Maintain and replace as necessary and as required by the NYSDEC, MW-8 and MW-9, as depicted on Schedule A Survey and as set forth in Section 3.3 of the NYSDEC approved SMP and Revised SMP. As noted, the well casing of MW-8 was found to be damaged during the 2021 sampling event. HRP recommends decommissioning MW-8 in accordance with the protocols outlined in NYSDEC's CP-43: Groundwater Monitoring Well Decommissioning Policy and amending revising the Revised SMP to eliminate the requirement for annual groundwater sampling at MW-8. Based on historic groundwater sampling results, installation of a replacement monitoring well is not necessary.

An Environmental Easement was recorded to provide an enforceable legal instrument to ensure compliance with all ECs and ICs placed on the Site. A SMP was implemented and it specified the methods necessary to ensure compliance with all ECs and ICs required by the Environmental Easement for COCs that remain at the Site. Specifically, the SMP and Revised SMP include provisions for the implementation and maintenance of the controls currently in-place, including surface soils as a soil cover, for a soil management plan for any future Site excavation, and for a monitored natural attenuation program to address groundwater.

Annual groundwater sampling has been completed as part of the natural attenuation program since the SMP was established in 2014, and included sampling events in April 2014, November 2014, April 2015, June 2016, November 2017, and January 2019 (sampling events were not conducted in 2018 or 2020). The 2021 SMP called for continued annual monitoring from 2021 through at least 2023, to continue as determined by the NYSDEC, until residual groundwater concentrations are found to be consistently below NYSDEC standards or have become asymptotic at an acceptable level over an extended period or when termination is granted by the NYSDEC. The first annual groundwater sampling event conducted under the 2021 SMP was completed in September 2021 with a second annual groundwater sampling event completed in September 2022. The third, fourth, and fifth annual groundwater sampling events were completed in September 2023, November 2024, and October 2025, respectively.

Following the 2017 groundwater monitoring event, it was determined by the NYSDEC that metals and PCB constituents met remedial objectives for the Site, and sampling of these constituents was discontinued. However, the continued annual sampling and analysis of groundwater wells for VOCs and SVOCs is to continue until the NYSDEC grants termination of the annual sampling.

### **3.0 EVALUATION OF REMEDY PERFORMANCE, EFFECTIVENESS & PROTECTIVENESS**

The remedial action objectives (RAOs) for this Site are to eliminate or reduce to the extent practicable:

- Groundwater RAOs for Public Health Protection:
  - Prevent ingestion of groundwater with levels exceeding drinking water standards.
- Soil RAOs for Public Health Protection:
  - Prevent ingestion/direct contact with impacted soil.
- Soil Vapor RAOs for Public Health Protection
  - Mitigate impacts to public health resulting from the existing, or the potential for, SVI into buildings at the Site.

Below is a summary of the effectiveness of the remedy in the achieving the above RAOs:

- Groundwater RAOs:
  - The IC of restricting groundwater use has been effective in preventing ingestion of impacted groundwater. In addition, groundwater sampling as part the IC and EC, natural attenuation monitoring program indicates that COC levels have remained consistent with or are lower since the remedy was selected.
- Soil RAOs:
  - The EC, or the soil cover, has been inspected annually and found to be intact and undisturbed. The soil cover has provided effectiveness in preventing ingestion and direct contact with impacted soil since the remedy was selected.
- Soil Vapor RAOs:
  - No buildings have been constructed on SRA-B since the remedy was selected. Therefore, there are no concerns of SVI or impacts to public health.

## **4.0 INSTITUTIONAL AND ENGINEERING CONTROL PLAN**

### **4.1 Institutional Controls**

The Site has a series of ICs in the form of Site restrictions. Adherence to these ICs is required by the Environmental Easement. Site restrictions that apply to the Site are:

- The Site may only be used for restricted residential use provided that the long-term ECs and ICs included in the SMP and Revised SMP are employed;
- The Site may not be used for a higher level of use, such as unrestricted residential use without additional remediation and amendment of the Environmental Easement, as approved by the NYSDEC;
- All future activities on the Site that will cause a disturbance beneath the 2-foot topsoil cover must be conducted in accordance with the NYSDEC approved SMP and Revised SMP;
- The use of the groundwater underlying the property is prohibited without treatment rendering it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval from the NYSDEC and Ulster County Department of Health;
- Vegetable gardens and farming on the Site are prohibited; and
- Monitoring, maintaining and replacing any on-site groundwater monitoring wells as depicted on Schedule A Survey and as set forth in Section 3.3 of the NYSDEC approved SMP and Revised SMP, as necessary and as required by the NYSDEC. As noted, the well casing of MW-8 was found crushed during the 2021 sampling event. HRP recommends decommissioning MW-8 in accordance with the protocols outlined in NYSDEC's CP-43: Groundwater Monitoring Well Decommissioning Policy and amending revising the Revised SMP to eliminate the requirement for annual groundwater sampling at MW-8. Based on historic groundwater sampling results, installation of a replacement monitoring well is not necessary.

### **4.2 Engineering Controls**

The EC system for this Site includes the following:

- Exposure to remaining impacts in subsurface soil at the Site is prevented by a soil cover system in place over the Site. This cover system is comprised of a minimum of 24 inches of existing surface soils with a grassy cover.
- The potential for vapor intrusion must be evaluated for any buildings developed at the Site, and any potential impacts that are identified must be monitored or mitigated;
- Groundwater monitoring must be conducted and the maintenance and replacement of wells MW-8 and MW-9 must be conducted as necessary and as required by the NYSDEC.

As Noted, the well casing of MW-8 was found to be damaged during the 2021 sampling event. HRP recommends decommissioning MW-8 in accordance with the protocols outlined in NYSDEC's CP-43: Groundwater Monitoring Well Decommissioning Policy and amending revising the Revised SMP to eliminate the requirement for annual groundwater sampling at MW-8. Based on historic groundwater sampling results, installation of a replacement monitoring well is not necessary.

#### **4.3 Remedial Action Objective Status**

All ICs/ECs remain in place and are fully effective in meeting the RAOs for the Site.

#### **4.4 Corrective Measures**

The Site is not in compliance with the monitoring plan set forth in the 2021 SMP, as annual groundwater sampling could not be completed at MW-8. HRP recommends decommissioning MW-8 in accordance with the protocols outlined in NYSDEC's CP-43: Groundwater Monitoring Well Decommissioning Policy and revising the SMP to eliminate the requirement for annual groundwater sampling at MW-8. A Corrective Measures The IC/EC certifications and a Corrective Measures Work Plan which addresses the non-compliance issue, are included in **Appendix A**. No other areas of non-compliance were identified with regard to the SMP, and ICs and ECs remain in place.

#### **4.5 Conclusions and Recommendations**

No steps are required at this time to address any deficiencies in the ICs/ECs.

#### **4.6 IC/EC Certification**

The completed IC/EC certifications for the Site are included in **Appendix A**.

**5.0 MONITORING PLAN COMPLIANCE**

**5.1 Components of Monitoring Plan as Outlined in the SMP and Revised SMP**

Monitoring Program	Frequency	Matrix	Analysis
Groundwater	Semi-annual (1 <sup>st</sup> year)	Groundwater	VOCs, SVOCs, TAL Metals (total and dissolved), PCBs
Groundwater	Annual (years 2-5)	Groundwater	VOCs, SVOCs (2016-2019) and PCBs, TAL Metals (total and dissolved) (2016-2017)
Groundwater	Annual (years 6-8)	Groundwater	VOCs and SVOCs (2021-2023)
Inspection	Annual, or within 5 days of severe weather	Soil Cover	NA

**5.2 Monitoring Completed**

**5.2.1 Groundwater Monitoring**

Annual sampling was completed at the Site as part of this PRR in October 2025. Groundwater sampling was completed at monitoring well MW-9 in accordance with the 2021 Revised SMP. The laboratory analysis completed is outlined above. Groundwater sampling could not be completed at MW-8 as scheduled as the well was found to be damaged. The locations of monitoring wells MW-8 and MW-9 are depicted on **Figure 2**. Tables and graphs of results depicting the COC concentrations for all sampling events are included in **Appendix B**. Below is a summary of the results and trends of sampling events.

- No non-aqueous phase liquid (NAPL) or a sheen was observed on any of the groundwater samples collected during sampling events;
- Historically, only two (2) VOCs have been detected above TOGS standards in MW-8;
- No SVOCs have been detected at concentrations exceeding TOGS standards in MW-8 during historic sampling events conducted at MW-8;
- During the 2025 sampling event, no VOCs or SVOCs were detected above TOGS standards in MW-9;
- Historically, no VOCs or SVOCs have been detected at concentrations exceeding TOGS standards in MW-9;
- The RAOs for groundwater are being met in that the prevention of ingestion of groundwater containing COC levels exceeding drinking water standards continue to be employed at the Site; and

- Sampling of MW-8 has not been possible since 2021 as the stickup casing was found to be damaged. With the approval of the NYSDEC, HRP recommends the decommissioning of MW-8. Otherwise, the monitoring of the groundwater at the Site was compliant with the Revised SMP with the sampling at MW-9.

### 5.2.2 Site Annual Inspection

A Site-wide inspection was conducted in October 2025 and is recorded on the Inspection Forms in **Appendix C**. HRP visually inspected the Site and a log of Site inspection photographs is located in **Appendix D**. The Site perimeter is fenced and the Site lies within private property owned by Watchtower, which prohibits public access to the Site. The Site was properly maintained (i.e. mowed and free of debris). As stated, MW-8 was found to be damaged. The existing soil cover at the Site was intact. No changes in Site use since the Certification of Completion was approved were noted.

Currently the Site remedy does not rely on any mechanical systems, such as sub-slab depressurization systems or air sparge/soil vapor extraction systems to protect the public health and the environment. However, should a sub-slab depressurization system be installed in the future based on the results of a SVI evaluation, then the SMP will be amended as appropriate to include an Operation and Maintenance Plan and an associated Section 5.0, Inspection Reporting and Certifications.

Other than the existing soil cover at the Site no other ECs have been implemented.

### 5.3 Comparisons to Remedial Objectives

The EC for the soil cover was inspected and determined to be intact and undisturbed. The soil cover has been effective in preventing ingestion and direct contact with impacted soil since the remedy was selected. Therefore, this RAO is being met at this time.

The groundwater monitoring activities indicate COC concentrations are remaining the same or are lower than previous sampling events. Therefore, the RAOs for groundwater have been met via ICs, including the continued monitoring and the restricting of groundwater use at the Site.

No buildings have been constructed at the Site since the remedy was selected. Therefore, there are no concerns of SVI or impacts to the public health.

These portions of the Site remedy are in compliance with the SMP.

### 5.4 Monitoring Deficiencies

- The monitoring of groundwater at the Site was not completed in full compliance with the monitoring plan outlined in the Revised SMP because MW-8 was found to be damaged. With the approval of the NYSDEC, HRP recommends the decommissioning of MW-8. Based on historic groundwater sampling results, installation of a replacement monitoring well is not necessary.

## **6.0 CONCLUSIONS AND RECOMMENDATIONS**

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The periodic review process is used for determining if a remedy continues to be properly managed, and if the remedy continues to be protective of human health and the environment.

### **6.1 Conclusions**

The following conclusions discuss the effectiveness of the Site's remedial system in comparison to the applicable Site remedial goals derived from the SMP, the revised SMP Decision Document for the Site, and DER-10.

Compliance and Performance with the Revised SMP:

1. MW-8 could not be sampled during the annual sampling events. All other ECs and ICs are currently in place, are effective in protecting human health and the environment, and are compliant with provisions specified in the SMP.
2. The remedial action objectives for the Site are being or have been met.
3. Monitoring plan – The Site inspection and groundwater monitoring activities indicate remedial action objectives for the Site are being or have been met.

### **6.2 Recommendations**

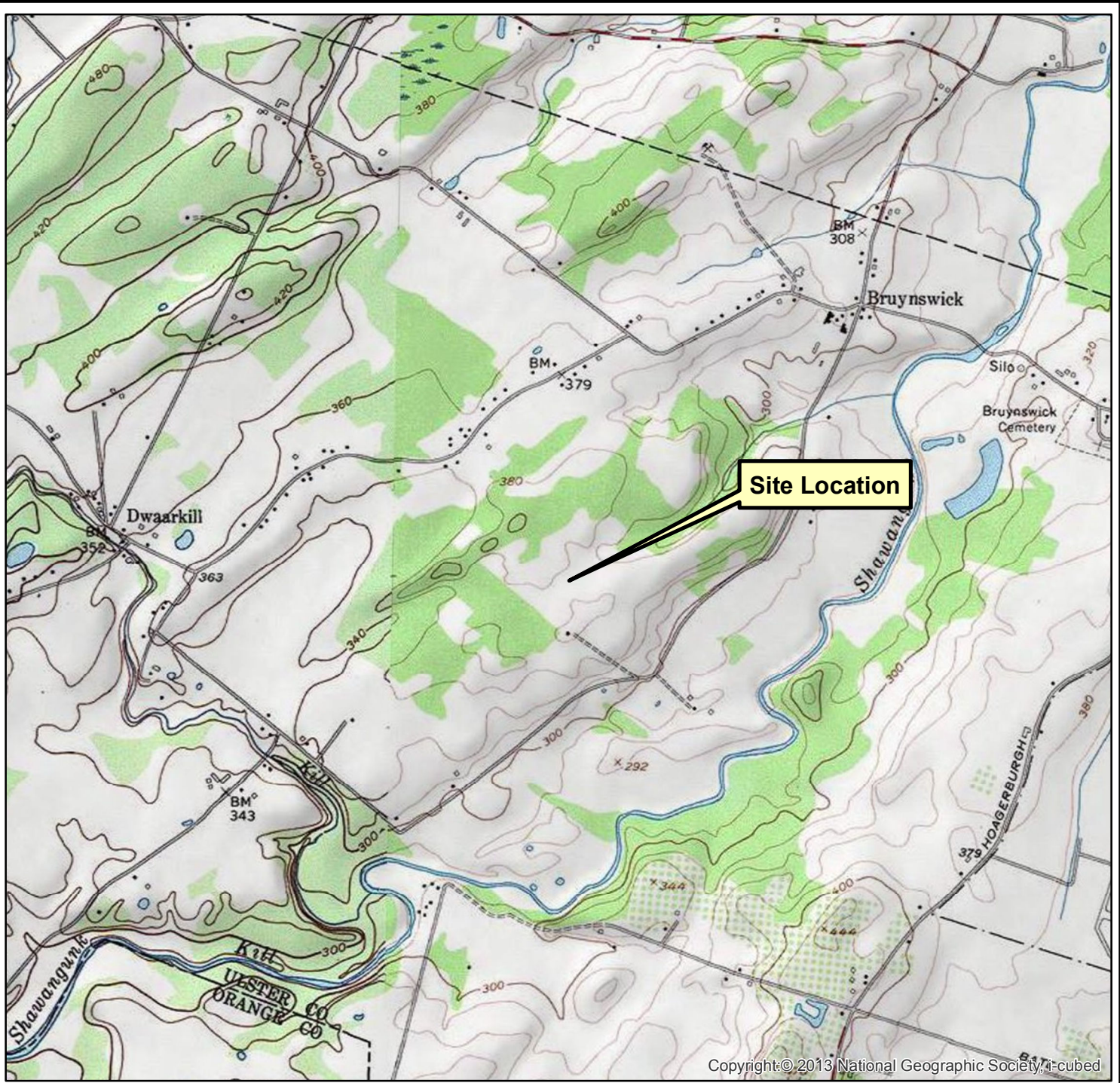
Based on the findings of the 2025 site inspection, and review of historic groundwater sampling results, HRP recommends taking the following steps:

- Decommission MW-8 in accordance with the protocols outlined in NYSDEC's CP-43: Groundwater Monitoring Well Decommissioning Policy. As outlined in the 2021 SMP, monitoring well decommissioning will only be performed with the approval of the NYSDEC.
- Amend the Revised SMP to eliminate the requirement for annual groundwater sampling at MW-8. Based on historic groundwater sampling results, installation of a replacement monitoring well is not necessary.

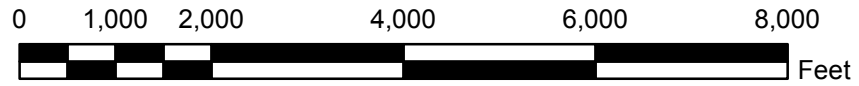
The Revised SMP requires a PRR be completed and submitted at the end of the sampling during the 2026-2029 period. Annual groundwater sampling will continue at MW-9 as outlined in the 2021 Revised SMP.

The requirements in the SMP and Revised SMP state that the groundwater monitoring program would be conducted over a five-year period (2014-2018) with annual monitoring occurring for three additional years (2021-2023). Annual monitoring at monitoring well MW-9, as set forth in the 2021 Revised SMP for the Site will continue until the NYSDEC grants termination. At the end of 2026, the need for additional annual monitoring will be assessed. The remaining objectives of the Revised SMP shall remain in place.

# FIGURES



Copyright: © 2013 National Geographic Society, i-cubed



USGS Quadrangle Information  
 Quad ID: 41074-F2  
 Name: Gardiner, New York  
 Date Rev: 1957  
 Date Pub: 1961

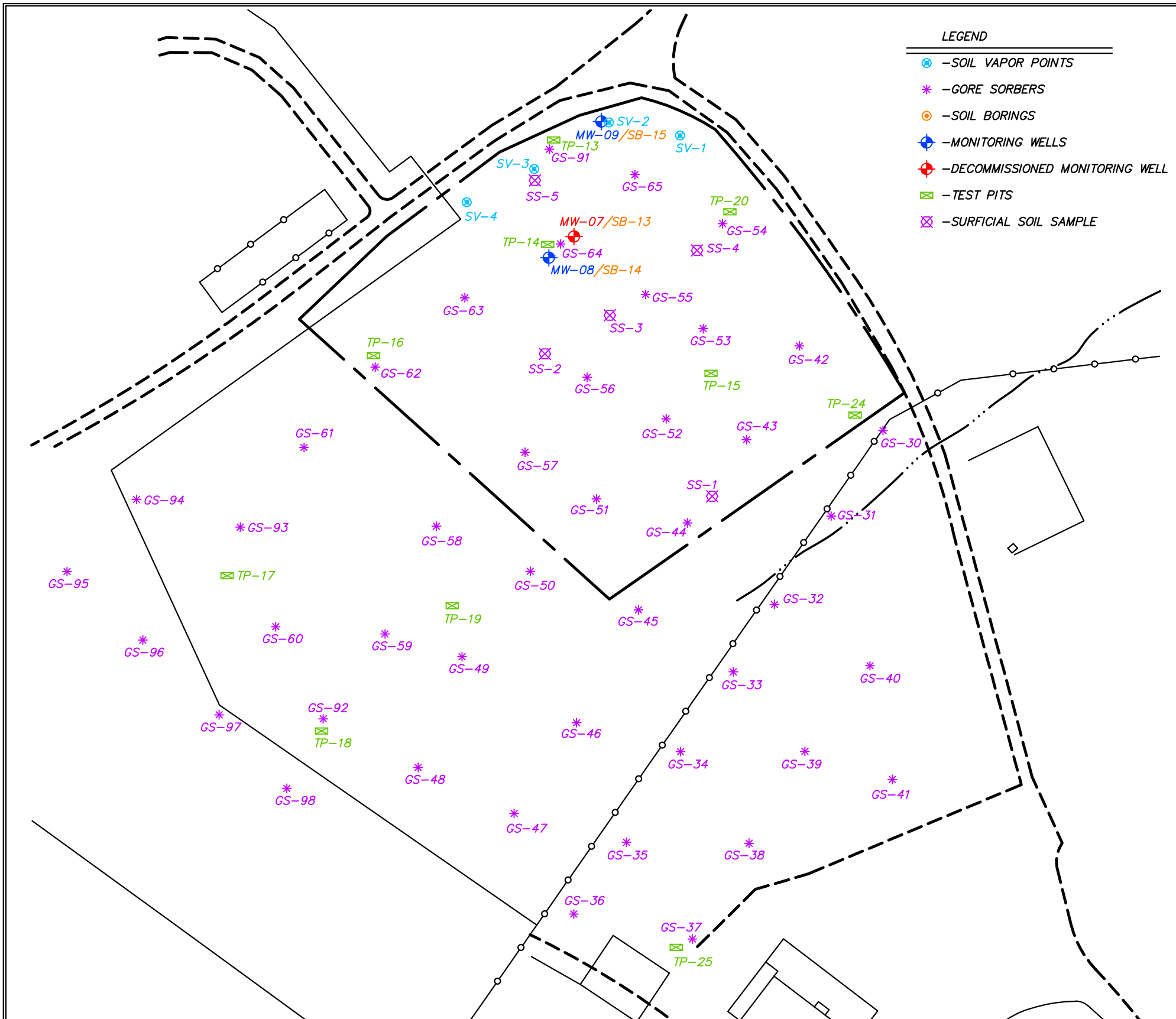
**Figure 1**  
**Site Location Map**  
**(Topographic Quadrangle)**  
**10 Sawmill Place**  
**Walkkill, New York**  
**HRP# WES5902.WM**  
**Scale 1" = 2,000'**



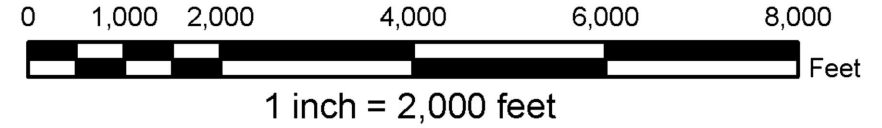
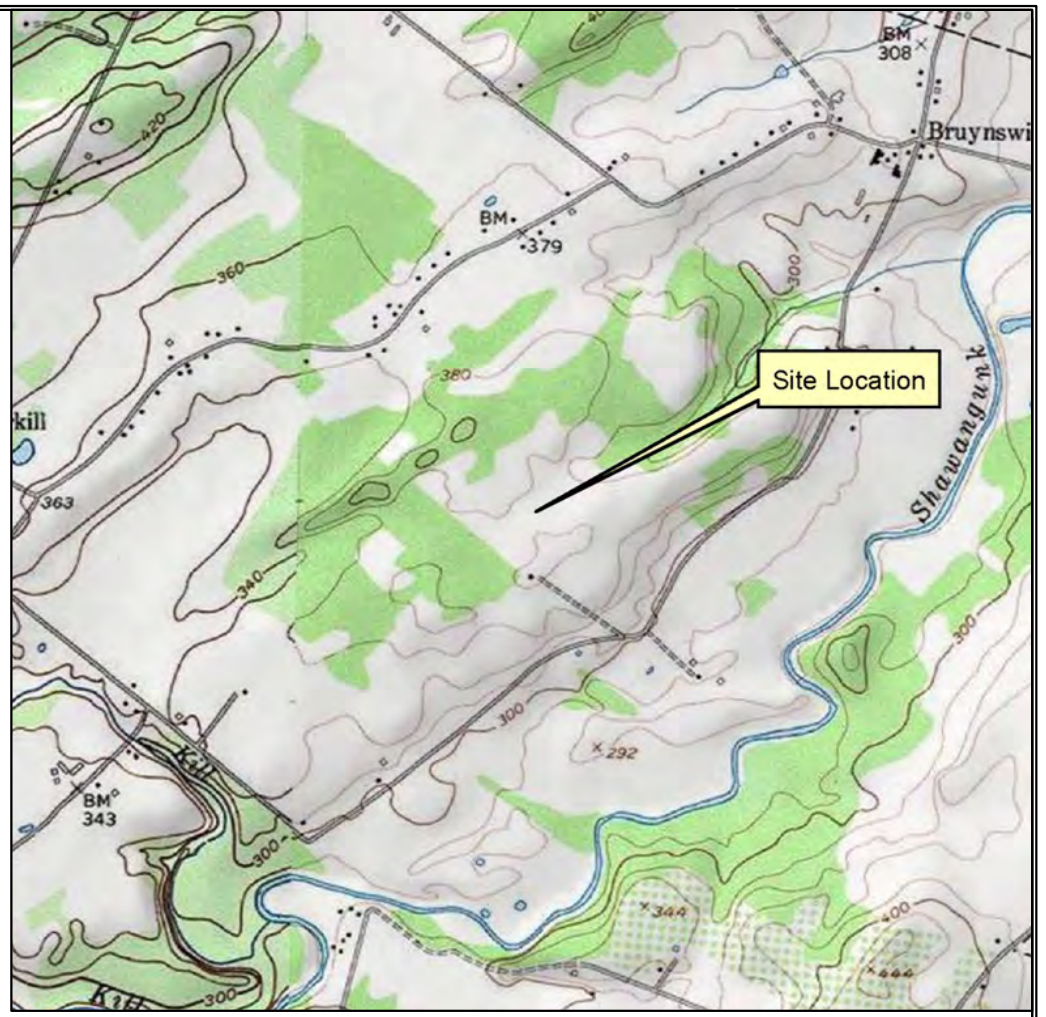
MOVE YOUR ENVIRONMENT FORWARD

ONE FAIRCHILD SQUARE  
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 CLIFTON PARK, NY 12065  
 (518) 877-7101  
 HRPASSOCIATES.COM

DRAWING NAME: S:\Data\W\WESH - WEST FIRM, PLLC\CONFIDENTIAL CLIENT\WES5902\WM\WP\SRA-B\Figures\Figure 1 - Site Plan.dwg LAYOUT: 11X17 LANDSCAPE PLOT DATE: Mar 10, 2021 - 8:43am OPERATOR: BOB



- LEGEND**
- -SOIL VAPOR POINTS
  - \* -GORE SORBERS
  - -SOIL BORINGS
  - ⊕ -MONITORING WELLS
  - ⊖ -DECOMMISSIONED MONITORING WELL
  - ⊠ -TEST PITS
  - ⊞ -SURFICIAL SOIL SAMPLE



REVISIONS	
NO.	DATE

DESIGNED BY:  
**PM**

DRAWN BY:  
**BOB**

REVIEWED BY:  
**MEW**

PROJECT NUMBER:  
**WES5902.WM**

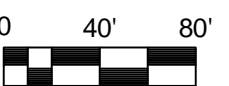
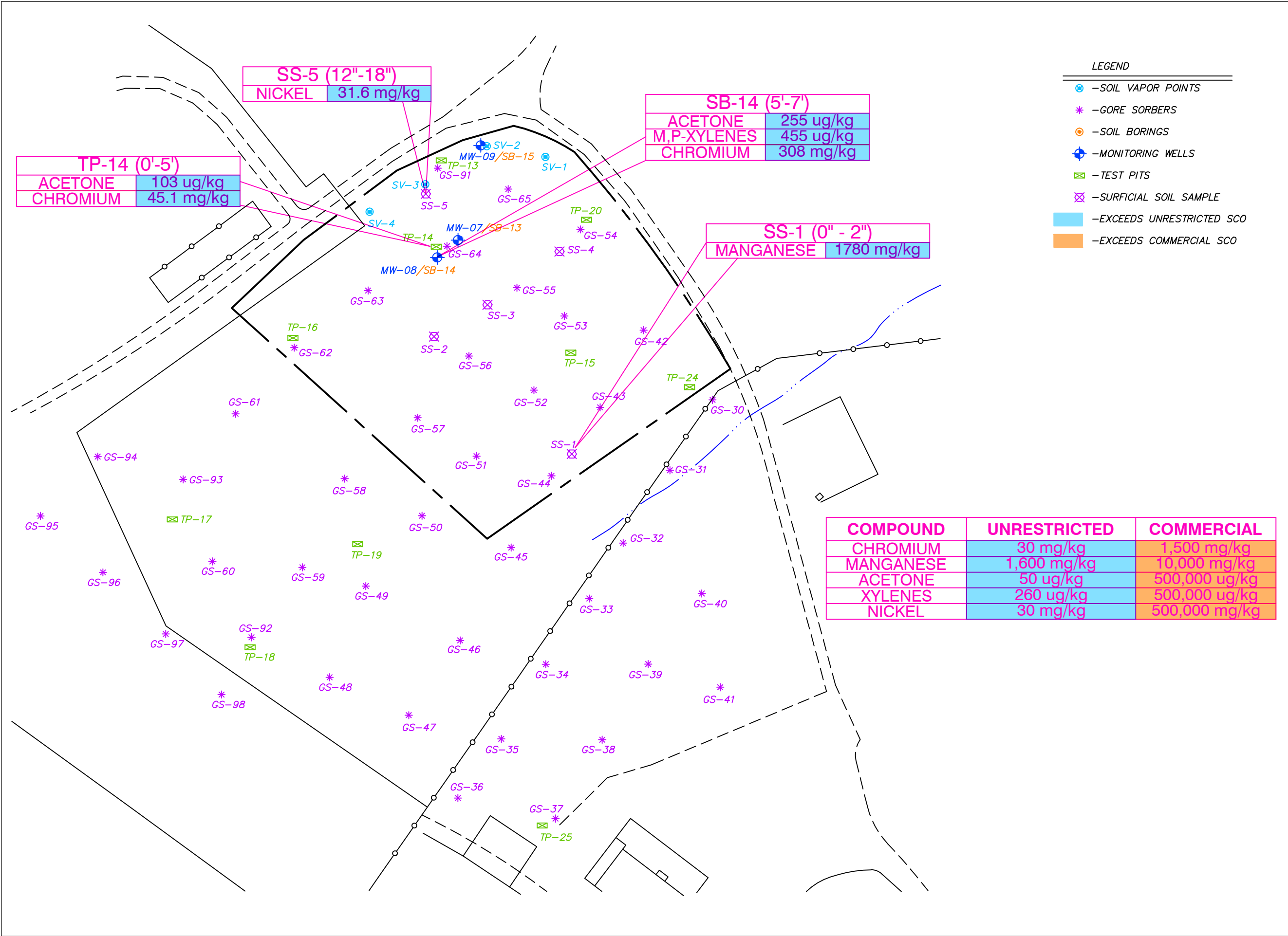
ISSUE DATE:  
**03/10/2021**

SHEET SIZE:  
**11"x17"**

**SRA-B: SITE PLAN**

**900 RED MILLS ROAD**  
**WALKKILL, NEW YORK**

SHEET NO.  
**Fig. 2**



- LEGEND**
- SOIL VAPOR POINTS
  - GORE SORBERS
  - SOIL BORINGS
  - MONITORING WELLS
  - TEST PITS
  - SURFICIAL SOIL SAMPLE
  - EXCEEDS UNRESTRICTED SCO
  - EXCEEDS COMMERCIAL SCO

REVISIONS	
NO.	DATE

DESIGNED BY:	JUL
DRAWN BY:	BOB
REVIEWED BY:	CEL

ISSUE DATE:	5/6/2015
PROJECT NUMBER:	P260.PR
SHEET SIZE:	11"x17"

**SRA-B  
 SOIL SAMPLE  
 EXCEEDANCES  
 (2008-2012)**  
 900 RED MILLS ROAD  
 WALLKILL, NEW YORK

**FIGURE  
 3**

# APPENDIX A

## IC/EC Certifications



**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	
<b>Site No.</b>	<b>C356043</b>		
<b>Site Name</b> Sawmill Place Remediation Area B SRA-B			
Site Address: 10 Sawmill Place      Zip Code: 12589			
City/Town: Walkill			
County: Ulster			
Site Acreage: 1.940			
Reporting Period: April 15, 2023 to April 15, 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"/>
<b>If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.</b>			
5.	Is the site currently undergoing development?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		<b>Box 2</b>	
		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"/>
<b>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.</b>			
<b>A Corrective Measures Work Plan must be submitted along with this form to address these issues.</b>			
_____ Signature of Owner, Remedial Party or Designated Representative		_____ Date	

**Box 2A**

YES NO

8. Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?  YES  NO

**If you answered YES to question 8, include documentation or evidence that documentation has been previously submitted with this certification form.**

9. Are the assumptions in the Qualitative Exposure Assessment still valid?  YES  NO  
(The Qualitative Exposure Assessment must be certified every five years)

**If you answered NO to question 9, the Periodic Review Report must include an updated Qualitative Exposure Assessment based on the new assumptions.**

SITE NO. C356043

Box 3

**Description of Institutional Controls**ParcelOwnerInstitutional Control

99.004-1-11

Watchtower Bible and Tract Society of NY

Ground Water Use Restriction  
Landuse Restriction  
Monitoring Plan  
Site Management Plan

IC/EC Plan

1. Groundwater Use Restriction: The use of groundwater underlying the property is prohibited without treatment to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval from the Department and the Ulster County Department of Health.
2. Land Use Restriction: The controlled property as described in the environmental easement is restricted to a restricted-residential use. Vegetable gardens and farming on the controlled property is prohibited.
3. Site Management Plan: Any intrusive activities, including building renovation/expansion, subgrade utility line repair/relocation, and new construction which will cause a disturbance beneath the 2 feet topsoil cover must be conducted in accordance with the Department approved Site Management Plan (SMP).
4. Monitoring Plan: Monitor, maintain, and replace as necessary any on-site Groundwater Monitoring Wells as depicted on Schedule A Survey and as set forth in Section 3.3 of the Department approved SMP.

Box 4

**Description of Engineering Controls**ParcelEngineering Control

99.004-1-11

Cover System

1. Cover System: Any soil on the property must be covered by a barrier layer approved by the Department such as concrete, asphalt, structures, or a minimum two (2) feet soil cover underlain by a demarcation barrier (e.g. geotextile) for vegetated areas. The soil cover will be placed over a demarcation layer, with the upper six inches of the soil of sufficient quality to maintain a vegetation layer. Any fill material brought to the site will meet the requirements for the identified site use as set forth in 6NYCRR Part 375-6.7(d).
2. Vapor Mitigation: Should a building(s) be erected, prior to construction, a Soil Vapor Intrusion (SVI) Investigation shall be conducted in accordance with the applicable guidance in effect at the time of the investigation. If the results of this SVI investigation demonstrate the need for a sub-slab vapor extraction system, an appropriate system shall be designed, constructed and maintained.
3. Groundwater Monitoring Wells: Maintain and replace as necessary, MW-8 and MW-9, as depicted on Schedule A Survey and as set forth in Section 3.3 of the Department approved SMP.

### 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. C356043

Box 6

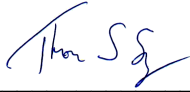
**SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE**

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 Thomas S. Seguljic at HRP Associates, Inc.  
1 Fairchild Square, Suite 110  
Clifton Park, NY 12065,  
print name print business address

am certifying as Designated Representative Rendering Certification (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

5/11/26

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 Mark Wright, P.G. at HRP Associates, Inc.  
print name 1 Fairchild Square, Suite 110, Clifton Park, NY 12065  
print business address

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



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

\_\_\_\_\_  
Stamp  
(Required for PE)

5/11/26

Date

# APPENDIX B

## Tables and Graphs of Groundwater Results

**Table 1**  
**SRA-B**  
 10 Sawmill Place  
 Walkill, New York  
**Groundwater Laboratory Analytical Results 2008-2025**  
**Volatile Organic Compounds**  
**Detections Only**

Parameter		Acetone	Benzene	Dichlorodifluoromethane (Freon12)	Ethylbenzene	Total Xylene	Naphthalene	Trichlorofluoromethane (Freon 11)	n-Butylbenzene	1,4-Dichlorobenzene	n-Propylbenzene	1,3,5-Trimethylbenzene	Butanone
Well ID	Date	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L
MW-08*	4/22/08	20.1	ND	2.6	2.0	11.5	ND	33.2	ND	ND	ND	ND	ND
	12/6/11	ND	ND	2.7	ND	ND	ND	22.4	ND	ND	ND	ND	ND
	4/28/14	ND	ND	2.53	ND	ND	0.88	26.4	ND	ND	ND	ND	ND
	11/20/14	11.3	ND	1.3	ND	ND	ND	13.7	ND	ND	ND	ND	ND
	4/28/15	ND	ND	1.6	ND	ND	ND	23.4	ND	ND	ND	ND	ND
	6/14/16	7.7	ND	ND	ND	ND	0.80	8.0	0.60	0.30	0.50	0.60	ND
	11/15/17	1.42	ND	ND	ND	ND	ND	3.56	ND	ND	ND	ND	ND
1/23/19	4.0	ND	0.30	ND	0.60	ND	8.0	ND	ND	ND	ND	0.40	
MW-09	4/22/08	ND	ND	ND	ND	ND	ND	0.90	ND	ND	ND	ND	ND
	12/6/11	ND	ND	ND	ND	ND	ND	2.4	ND	ND	ND	ND	ND
	4/28/14	ND	ND	ND	ND	ND	ND	3.14	ND	ND	ND	ND	ND
	11/20/14	ND	ND	ND	ND	ND	ND	3.3	ND	ND	ND	ND	ND
	4/28/15	ND	ND	ND	ND	ND	ND	3.9	ND	ND	ND	ND	ND
	6/14/16	ND	ND	ND	ND	ND	ND	3.0	ND	ND	ND	ND	ND
	11/15/17	1.2	ND	ND	ND	ND	ND	2.68	ND	ND	ND	ND	ND
	1/23/19	ND	ND	ND	ND	ND	ND	3.0	ND	ND	ND	ND	ND
	9/20/21	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	9/22/22	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	9/25/23	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
11/18/24	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
10/21/25	ND	ND	ND	ND	ND	ND	1.3	ND	ND	ND	ND	ND	
<b>NYSDEC Class GA Criteria</b>		<b>50</b>	<b>1</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>10</b>	<b>5</b>	<b>5</b>	<b>3</b>	<b>5</b>	<b>5</b>	<b>NE</b>

NYSDEC Class GA criteria are from NYSDEC Technical and Operational Guidance Series (TOGS 1.1.1), Ambient water quality, class GA standards/guidance values from Table 1.

**Legend:**

ND	Parameter not detected above the laboratory reporting limit
1	Parameter reported at a concentration greater than NYSDEC Class GA Criteria
1	Parameter reported above the laboratory reporting limit but below the applicable regulatory standard/criterion

NA Not Analyzed  
 NE Not Established  
 µg/L micrograms per Liter  
 VOCs Volatile Organic Compounds  
 \* MW-08 casing found crushed during 2021 sampling event



Table 2  
SRA-B  
10 Sawmill Place  
Wallkill, New York  
Groundwater Laboratory Analytical Results 2008-2025  
Semi-Volatile Organic Compounds  
Detections Only

Parameter		Bis(2-ethylhexyl)phthalate	Benzoic Acid	Diethyl phthalate	Fluoranthene	Phenanthrene	Pyrene	Acenaphthene	Anthracene
Well ID	Date	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L
MW-08*	4/22/08	ND	ND	ND	ND	ND	ND	ND	ND
	12/6/11	<b>3.21</b>	ND	ND	ND	ND	ND	ND	ND
	4/28/14	ND	ND	ND	ND	ND	ND	ND	ND
	11/20/14	ND	<b>4.01</b>	<b>1.33</b>	ND	ND	ND	ND	ND
	4/28/15	ND	ND	ND	ND	ND	ND	ND	ND
	6/14/16	ND	ND	ND	ND	ND	ND	ND	ND
	11/15/17	ND	ND	ND	<b>0.21</b>	<b>0.06</b>	<b>0.14</b>	<b>0.11</b>	<b>0.05</b>
MW-09	4/22/08	ND	ND	ND	<b>2.20</b>	<b>1.33</b>	<b>3.13</b>	ND	ND
	12/6/11	ND	ND	ND	ND	ND	ND	ND	ND
	4/28/14	ND	ND	ND	ND	ND	ND	ND	ND
	11/20/14	ND	ND	ND	ND	ND	ND	ND	ND
	4/28/15	ND	ND	ND	ND	ND	ND	ND	ND
	6/14/16	<b>2.52</b>	ND	ND	ND	ND	ND	ND	ND
	11/15/17	<b>0.79</b>	ND	ND	ND	ND	ND	ND	ND
	9/20/21	ND	ND	ND	ND	ND	ND	ND	ND
	9/22/22	ND	ND	ND	ND	ND	ND	ND	ND
	9/25/23	ND	ND	ND	ND	ND	ND	ND	ND
11/18/24	ND	ND	ND	ND	ND	ND	ND	ND	
10/21/25	ND	ND	ND	ND	ND	ND	ND	ND	
<b>NYSDEC Class GA Criteria</b>		<b>5</b>	<b>NE</b>	<b>NE</b>	<b>50</b>	<b>50</b>	<b>50</b>	<b>20</b>	<b>50</b>

NYSDEC class GA criteria are from NYSDEC Technical and Operational Guidance Series (TOGS 1.1.1), Ambient water quality, class GA standards/guidance values from Table 1.

**Legend:**

ND	Parameter not detected above the laboratory reporting limit
<b>1</b>	Parameter reported at a concentrations greater than NYSDEC Class GA Criteria
<b>1</b>	Parameter reported above the laboratory reporting limit but below the applicable regulatory standard/criterion

- NA Not Analyzed
- NE Not Established
- µg/L micrograms per Liter
- SVOCs Semi-Volatile Organic Compounds
- \* MW-08 casing found crushed during 2021 sampling event

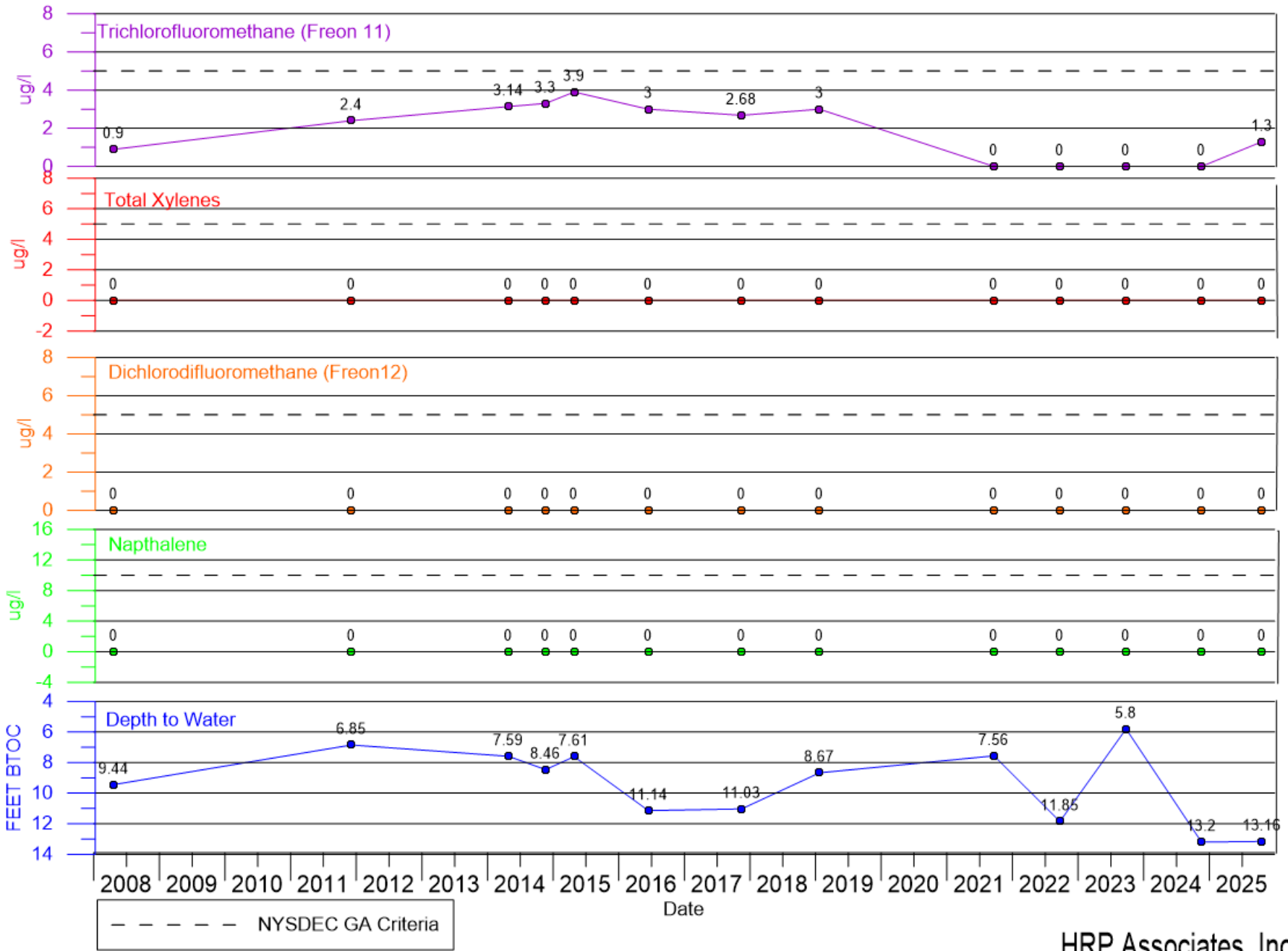
Table 3  
SRA-B  
10 Sawmill Place  
Shawangunk, New York  
Groundwater - Analyzed for TAL Metals (Total and Dissolved)  
(Only detected constituents are listed)

Parameter	Aluminum*	Barium	Beryllium	Cadmium	Calcium	Chromium	Cobalt	Copper	Iron	Lead	Magnesium	Manganese	Nickel	Potassium	Sodium	Vanadium	Zinc	Thallium	Antimony	Silver	Arsenic
Units	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
<b>Total Metals</b>																					
MW-08	4/22/08	ND	ND	ND	ND	0.0112	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	12/6/11	0.0842	0.174	ND	ND	206	0.018	ND	ND	0.0352	ND	1.01	0.0014	0.0016	10.9	5.26	ND	ND	ND	ND	ND
	4/28/14	0.0782	0.119	ND	ND	156	0.0146	ND	ND	0.0122	ND	0.0166	ND	ND	7.8	4.9	ND	ND	ND	ND	ND
	11/20/14	0.0992	0.466	ND	ND	433	0.0099	ND	0.0036	0.0432	ND	0.0606	0.0011	0.0036	11.5	9.53	ND	0.0068	ND	ND	ND
	4/28/15	0.0546	0.123	ND	ND	180	0.0142	0.0003	ND	0.0105	ND	0.0293	0.0011	0.0014	7.84	5.06	0.002	0.0053	ND	ND	ND
	6/14/16	0.158	0.224	ND	ND	243	0.0161	ND	0.0033	ND	ND	0.0107	ND	ND	9.4	6.96	0.0015	ND	ND	ND	ND
	11/15/17	0.292	0.189	ND	ND	219	0.0243	ND	0.0025	0.0635	ND	0.169	ND	0.0026	10.3	7.85	0.002	0.002	ND	0.0032	0.0006
MW-09	4/22/08	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	12/6/11	1.67	0.0694	ND	0.0002	128	0.0036	ND	0.0053	1.18	ND	18.6	0.0948	0.0026	4.14	8.57	0.0032	0.0135	ND	ND	ND
	4/28/14	0.787	0.065	ND	ND	112	0.0043	ND	0.003	1.61	ND	18.2	0.0788	0.0022	2.22	6.34	ND	0.0074	ND	ND	ND
	11/20/14	13.2	0.174	ND	ND	129	0.0324	0.0098	0.029	21.3	ND	25.2	0.859	0.022	4.96	7.68	0.0216	0.0855	ND	ND	ND
	4/28/15	0.681	0.044	0.0002	ND	99.1	0.0027	0.0004	0.0038	0.807	ND	13.2	0.0541	0.0018	2.87	5.37	0.0024	0.0194	ND	ND	ND
	6/14/16	6.41	0.124	ND	0.0005	0.0187	122	0.005	0.0188	11.6	0.0063	24.5	0.424	0.0114	3.98	7.86	0.0102	0.0543	ND	ND	ND
	11/15/17	71.2	0.499	0.0036	ND	158	0.192	0.0444	0.184	116	0.0878	42.2	2.43	0.116	9.85	6.76	0.109	0.605	ND	0.0052	ND
<b>Dissolved Metals</b>																					
MW-08	4/28/14	0.086	0.112	ND	ND	183	0.0123	ND	ND	ND	0.0088	0.0013	ND	8.5	5.39	ND	ND	ND	ND	ND	ND
	11/20/14	0.0628	0.49	ND	ND	419	0.01	ND	0.0038	ND	ND	0.0267	ND	0.0036	11.2	9.46	ND	ND	ND	ND	ND
	4/28/15	0.042	0.129	0.0002	ND	160	0.0144	0.0006	ND	0.0456	0.002	0.0105	0.001	ND	7.37	4.62	0.0014	0.0204	ND	ND	ND
	6/14/16	0.15	0.249	ND	ND	251	0.0133	ND	ND	0.0098	ND	0.0075	ND	ND	9.08	6.88	ND	ND	0.0058	ND	ND
	11/15/17	0.131	0.182	ND	ND	198	0.0228	ND	0.0045	0.105	ND	0.0327	ND	0.002	9.54	7.07	0.0014	0.0022	ND	0.003	ND
MW-09	4/28/14	ND	0.0519	ND	ND	120	ND	ND	0.0028	ND	ND	18	ND	ND	2.48	6.85	ND	ND	ND	ND	ND
	11/20/14	ND	0.0816	ND	ND	106	0.0021	ND	0.004	ND	ND	20.8	0.009	ND	2.53	7.78	ND	0.0029	ND	ND	ND
	4/28/15	0.0102	0.392	0.0002	ND	80.7	ND	0.0003	0.0038	ND	0.0025	12.9	0.002	ND	1.98	4.8	ND	0.008	ND	ND	ND
	6/14/16	ND	0.0982	ND	ND	123	0.0018	ND	0.0031	0.0276	ND	23	0.0433	ND	2.67	7.4	ND	0.0062	ND	0.0029	ND
	11/15/17	5.47	0.11	ND	ND	115	0.0116	0.0036	0.0122	6.13	0.0068	22.2	1.29	0.009	4.49	8	0.0098	0.0328	ND	0.0021	ND
NYSDEC Class GA Criteria	2	1	0.003	0.005	NE	0.05	0.005	0.2	0.3	0.025	35	0.3	0.1	NE	20	NE	2	0.0005	0.003	0.050	0.025

NYSDEC class GA criteria are from NYSDEC Technical and Operational Guidance Series (TOGS 1.1.1), Ambient water quality, class GA standards/guidance values from Table 1. \* Table 5

- Bold** Sample Exceeds NYSDEC Class GA Criteria
- NA Not Analyzed
- NE Not Established
- mg/l milligrams per liter
- ND Not Detected above laboratory detection limits

# SRA-B Groundwater Results 2008-2025 MW-9 VOCs



# APPENDIX C

## Inspection Form

**INSPECTION FORM**

**Sawmill Place Remediation Area (SRA-B)**

**10 Sawmill Place, Wallkill, New York**

**NYSDEC Site Code #356042**

Inspection completed by: James Charter

Date of inspection: 10/21/2025

Is this inspection:  Annual  Prompted by severe weather event

Describe weather event: Fair, 60F

List current use for site: Groundwater Monitoring (Cattle/Pasture Land)

List general site conditions: Farmland

Has the usage changed since the last inspection?

YES\*  NO

Is the 2 ft of soil cover still in place in all areas?

YES  NO

Are the top 6 inches of soil cover sufficient to support vegetation?

YES  NO\*

Are any non-vegetated areas (i.e. buildings, roadways, parking areas) covered by 6 inches of a paving system or concrete?

YES  NO\*

\*If you answered "yes" or "no" with asterisks (\*), please contact the NYSDEC to report your findings