

# C.T. MALE ASSOCIATES

Engineering, Surveying, Architecture, Landscape Architecture & Geology, D.P.C.

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September 5, 2023

Ms. Kelly Hale  
NYSDEC Central Office  
Division of Environmental Remediation  
625 Broadway, 11<sup>th</sup> Floor  
Albany, New York 12233 - 7020

Re: Periodic Review Report  
Former Jones & Laughlin Ore Processing (Site No. E645029)  
NYS State Route 3 and County Route 60  
Town of Clifton, St. Lawrence County, NY  
Reporting Period: June 29, 2019 to June 29, 2023  
C.T. Male Project No. 18.8546

Dear Ms. Hale:

C.T. Male Associates Engineering, Surveying, Architecture, Landscape Architecture & Geology D.P.C. (C.T. Male) presents this Periodic Review Report (PRR) of the Former Jones & Laughlin Ore Processing Site located in the Town of Clifton, St. Lawrence County, New York. The PRR was completed in general accordance with the June 2014 NYSDEC approved Final Site Management Plan (SMP) for the Former Jones & Laughlin 18Acre Site (ERP Site No. E645029).

C.T. Male completed a site-wide visit for this PRR on August 30, 2023 to observe the integrity of the existing cover system and general land use. This is the third PRR performed since the approval of the SMP. C.T. Male completed the first SMP PRR on October 18, 2018, and the second SMP PRR on June 25, 2020. T

## Site Overview

The Site boundaries subject to this PRR consists of three (3) separate parcels, which were formerly part of a larger 54-acre lot located on the south, west and east side of the intersection of Route 3 and County Route 60. The parcels are currently known as Area A (Tax Map ID 224.000-8-2), Area B (Tax Map ID 224.000-8-3) and Area C (Tax Map ID 224.000-8-4), herein referred to collectively as the "Site". A Site Location Map prepared by others is attached as Figure 1 to show the general boundaries of these parcels.

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General descriptions of the site layout for Area A, Area B and Area C are listed below:

- “Area A” is approximately 4.69-acres in size and is located on the south side of Route 3 at the intersection with County Route 60 with a vegetated access road bisecting the parcel down the middle from Route 3. This area consists primarily of thick wooded area with a large tailings pile from previous mining operations reportedly occupying about one-third of the southern portion of this area. The portion of the Site where the large tailings are located slopes significantly upward from south to north, but the rest of the Site is relatively flat nearing grade of Route 3.
- “Area B” is approximately 4.63-acres in size and located north of Route 3 and west of County Route 60 at the northwest quadrant of the intersection of these two (2) roadways. This area is relatively flat land with a mixture of wooded land (northern portion) and cleared area (southern portion). Access to the Site is from Route 3, via an unlocked gate in a chain link fence that fronts the adjacent roadways.
- “Area C” is approximately 4.94-acres in size and is located north of Route 3 and east of County Route 60 at the northeast quadrant of the intersection of these two (2) roadways. The area fronting Route 3 is primarily flat and consists of an equal mix of asphalt paved driveways and grassy areas, and a temporary/seasonal NYSDEC operated free boat washing station (closed at the time of the site visit). This area also has an active electrical substation owned and operated by National Grid (surrounded by a locked chain link fence), overhead power lines, a stretch of concrete road (which was formally Old State Route 3), and a relatively small pond. The Little River also touches the extreme eastern corner of this area.

### Site Management Plan Clarifications

The existing Site Management Plan (SMP) for the Site (by CDM Smith of Latham, New York) references 18-acres of land across three (3) areas of concern (AOCs) A, B and C, but these SMP designations do not match the current designations of Areas A, B and C. The cross reference of the SMP AOCs and Areas are listed below for clarity:

Current Reference	SMP Reference
Area A	AOC B
Area B	AOC A
Area C	AOC C

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The Certificate of Completion (COC) for the Site references the subject Site size to be 14.3 acres, not 18 acres per the SMP as the 18 acres apparently referenced acreage including the adjoining roadways when the parcel was previously one lot. Given these minor discrepancies, consideration should be given to updating the SMP accordingly to reflect these current "Area" designations and sizes.

### Selected Remedy

The selected remedy for the Site was completed in 2014 and the COC was issued by NYSDEC on June 9, 2014. The remedy consists of maintaining the existing Site cover, development of a SMP and execution of an Environmental Easement. The SMP was prepared by CDM Smith and approved by NYSDEC in June 2014 and the Environmental Easement was prepared and recorded at the St. Lawrence County Clerk's Office June 9, 2014.

To the best of our knowledge and belief, there has been no change to the selected remedy and there have been no significant changes to the existing Site cover (i.e., no excavation or disturbance) except for disturbance associated with Area A, which occurred prior to the 2020 PRR under the auspices of NYSDEC. This disturbed area appears to be similar to conditions observed at the time of the 2020 PRR.

### Evaluate Remedy Performance, Effectiveness and Protectiveness

The implemented remedy is achieving the remedial goals for the Site. The existing surface cover appears to be providing protection of human health and the environment. The existing surface cover at the time of the August 30, 2023 Site visit consists of well-established vegetated soil, asphalt or concrete and one (1) small wooden storage shed. All of these materials were in adequate condition with no excavated areas that would expose subsurface existing soils except for Area A, which has an area which has previously been excavated/disturbed. There is unvegetated soil (sandy) surfaces along the side of County Route 60, but the assumption is that this is within the right of way outside of the property boundaries.

Based on an inquiry with NYSDEC after the May 2020 Site visit about this disturbance on Area A, we were told *"the tailings on the south side of Route 3 were used by the DEC as backfill material for the PCB excavation and disposal."* The PCB excavation and disposal work occurred north of the sites subject to SMP monitoring discussed herein. NYSDEC also provided the following information relative to this disturbance:

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*"As stated in the IRM Work Plan (Parsons, 2018), a borrow area for backfill materials was identified across Route 3 from the site, as shown on Figure 2. Characterization samples were collected from this area in the fall of 2017 and analyzed for NYCRR Part 375 parameters. Analytical results from the characterization samples are provided in Table 1 in the IRM Work Plan (Parsons 2018). The source was approved by NYSDEC and used as site backfill. Restoration of the borrow source area was completed following completion of backfill activities. During the August 2019 excavation of Area C, borrow pit material [from Area A] was again used as backfill."*

C.T. Male did not review the results of the backfill testing or the locations of where these samples were collected, but we are assuming that if the disturbed soils in Area A were acceptable as backfill according to NYSDEC, then it may be acceptable to remain at the surface as acceptable surface cover. The lack of vegetated cover in a localized portion of Area A, given the vacant & unused nature of the Site, and location behind a locked gate, is not viewed as a substantial condition that fails to comply with the SMP to a degree that prevents C.T. Male from completing the attached certification form.

The excavated area in Area A remains unvegetated as of the August 30 2023 Site visit, but no erosion or washout appears to be occurring. As there was no evidence of excavation or disturbance observed, there was no reason to contact NYSDEC again during this 2023 PRR. While the potential for uncontrolled erosion and washout of these soils is increased by the lack of vegetation, this potential seems to be low based on Site observations. Best management practices would indicate that efforts should be made to get disturbed soils vegetated even if those soils have been tested to meet the applicable soil cleanup objectives to qualify as an acceptable surface cover.

### **IC/EC Plan Compliance Report**

The listed Institutional Controls (ICs)/Engineering Controls (ECs) listed in the PRR Notice Institutional and Engineering Controls Certification Form are still applicable and required for the Site. No action or changes are required for the IC/ECs. Attached is the signed IC/ECs Certification Form.

### **Monitoring Plan Compliance Report**

Monitoring requirements per the original SMP consist of comprehensive Site-wide inspections at a minimum of once per year. The last Site-wide inspection was performed in May 2020 as part of the 2020 PRR, which is on a three-year cycle. It is assumed that when the PRR frequency changed from annual to every three (3) years, the site-wide inspection changed to a three (3) year frequency as well. The frequency of the site-wide



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inspection (not the PRR) should be verified with NYSDEC as to whether it can mimic the PRR schedule of every three (3) years or needs to remain on an annual basis. Once this is confirmed, the SMP could be updated to correct the current frequencies along with the other minor SMP corrections previously described in this PRR.

Also, in the event of severe weather conditions, the SMP requires additional Site inspections. There were no known severe weather conditions during the reporting period that could have negatively affected ECs and therefore, there were no additional inspections performed.

### Operation & Maintenance Plan Compliance Report

The existing surface cover system is mostly very established wooded land and grass/weeds with localized areas of asphalt pavement or concrete. Figure 2 shows the typical site surface cover system as per a May 2022 aerial photograph, which remains similar conditions to what was observed during the August 2023 site visit by C.T. Male. These surface cover materials are in fair to good condition with no on-going erosion, deterioration or settling (slight exception for disturbance in Area A as explained in Section titled "Evaluate Remedy Performance, Effectiveness and Protectiveness"). There are other miscellaneous observations relative to the operation and maintenance of the Site, as follows:

#### Area A

- There were two 5-gallon buckets of broken glass and tin can lids, other misc. small old rusty empty containers observed in close proximity to the access gate, along the north and east sides of the access road. This was a similar observation in the last PRR where the materials look historically scattered. There were no additional new materials observed to suggest uncontrolled recent dumping.
- There is a bunker like structure constructed of concrete block with a mattress and miscellaneous debris inside of it. This is a similar condition observed during the last PRR. There is scattered plastic deteriorated containers inside and outside the structure including a 5-gallon pail partially filled with what appeared to be rainwater.
- The level of vegetation across the site was mature and well established except for the known disturbed area along the embankment that was a NYSDEC authorized disturbance.

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None of these items negatively affected the effectiveness of the existing surface cover on Site. The presence of the containers and debris are considered to be a de minimis condition.

### Area B

- In the central portion of the site, there is a piece of abandoned equipment that appeared to have several spray nozzles. This was a similar observation identified in the last PRR.
- Close to the abandoned spray equipment, there was a piece of steel extending out of the ground surface that may be a former water well. No evidence of using this well was observed, and it appears to be partially capped. This was a similar observation identified in the last PRR.
- There was a concrete slab on grade in the central portion of the Site that appeared to be associated with a former transformer with remnants of power lines. This was a similar observation identified in the last PRR.
- There was an open manmade structure associated with a buried utility pipeline and what appears to be a filled in cistern or related equipment adjacent to this structure. This was a new observation when compared to the last PRR, but we believe that we simply did not walk by this structure and it has been on-site historically. There is what appears to be wires and a garden hose spooled in the structure.
- The chain link fencing along the eastern side of the Site that abuts County Route 60 had some small areas of damage or deterioration whereby the effectiveness of the fencing is minimally reduced. This was a similar observation identified in the last PRR.

The suspected water well or open utility structure are not protected from public access although general access to the Site is limited, and the wooded nature of the site hides these features from the public. However, consideration should be given to completely capping the water well, fixing the damaged fence, and covering the open top utility structure. From a compliance standpoint, none of these items negatively affect the adequacy of surface cover system but would promote additional protection from the public.

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## Area C

- There was evidence of disturbance along the right of way following County Route 60 (closer to the northern end of the Site) for water related utilities.
- There were two (2) groundwater monitoring wells observed in the northwestern portion of the site. There were in good condition but there were no padlocks for added security against tampering.

None of these items affected the existing surface cover on Site. Adding padlocks to the protective well casing would provide additional protection from tampering.

Representative pictures have been attached for reference. Additional pictures are maintained within C.T. Male project files and are available upon request.

## Overall PRR Conclusions and Recommendations

The following conclusions and recommendations relative to compliance with the SMP are provided:

1. Groundwater Use Restriction: Requirements were met during the reporting period;
2. Land Use Restriction: Requirements were met during the reporting period;
3. Site Management Plan: Requirements were met during the reporting period. Recommend updates to correct Site sizes and designations, correct county route number, and to clarify the frequency of annual Site-wide inspections and PRRs;
4. Monitoring Plan: Requirements for annual inspection may not have been met if they are still required on an annual basis rather than three-year basis for the PRR;
5. IC/EC Plan: Requirements were met during the reporting period;
6. Cover System/Subsurface Barriers: Requirements were met during the reporting period except for unvegetated previously disturbed embankment in Area A from a NYSDEC involved action;
7. Based on C.T. Male's evaluation of the components of the SMP, the remedy is achieving the remedial objectives for the Site;
8. The frequency of the three-year submittal of the PRR is appropriate and should not change; and
9. Site management shall be continued.

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## Certifications

For each institutional or engineering control identified for the Site, I certify that all of the following statements are true with certain exceptions described herein:

- 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 SMP 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;
- Use of the Site is compliant with the environmental easement;
- The engineering control systems are performing 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, Jeffrey A. Marx, P.E., of C.T. Male Associates at 50 Century Hill Drive, Latham, New York, am certifying as St. Lawrence County and I have been authorized and designated by the Site owner to sign this certification for the Site.

If you have any questions, please contact me at (518) 786-7548 or via email at [j.marx@ctmale.com](mailto:j.marx@ctmale.com).

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Respectfully Submitted,

C.T. MALE ASSOCIATES

A handwritten signature in dark ink, appearing to read "Jeffrey A. Marx". The signature is fluid and cursive, with the first name "Jeffrey" and last name "Marx" being clearly legible.

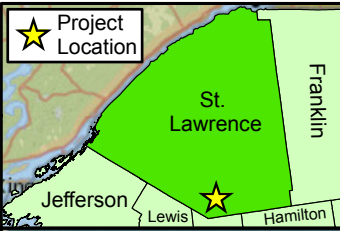
Jeffrey A. Marx, P.E.

Managing Environmental Engineer

Att    Figure 1 – Parcel Location Map  
         Figure 2 – May 2022 Aerial Photo from Google Earth  
         Periodic Review Report Certification Form  
         Site Inspection Checklist  
         Site Photos

ec:     Steve Button, Esq., St. Lawrence County Attorney  
         Ruth Doyle, St. Lawrence County Administrator  
         Jason Pfothenhauer, St. Lawrence County Director of County Planning Office  
         Gary Bowitch, Esq.



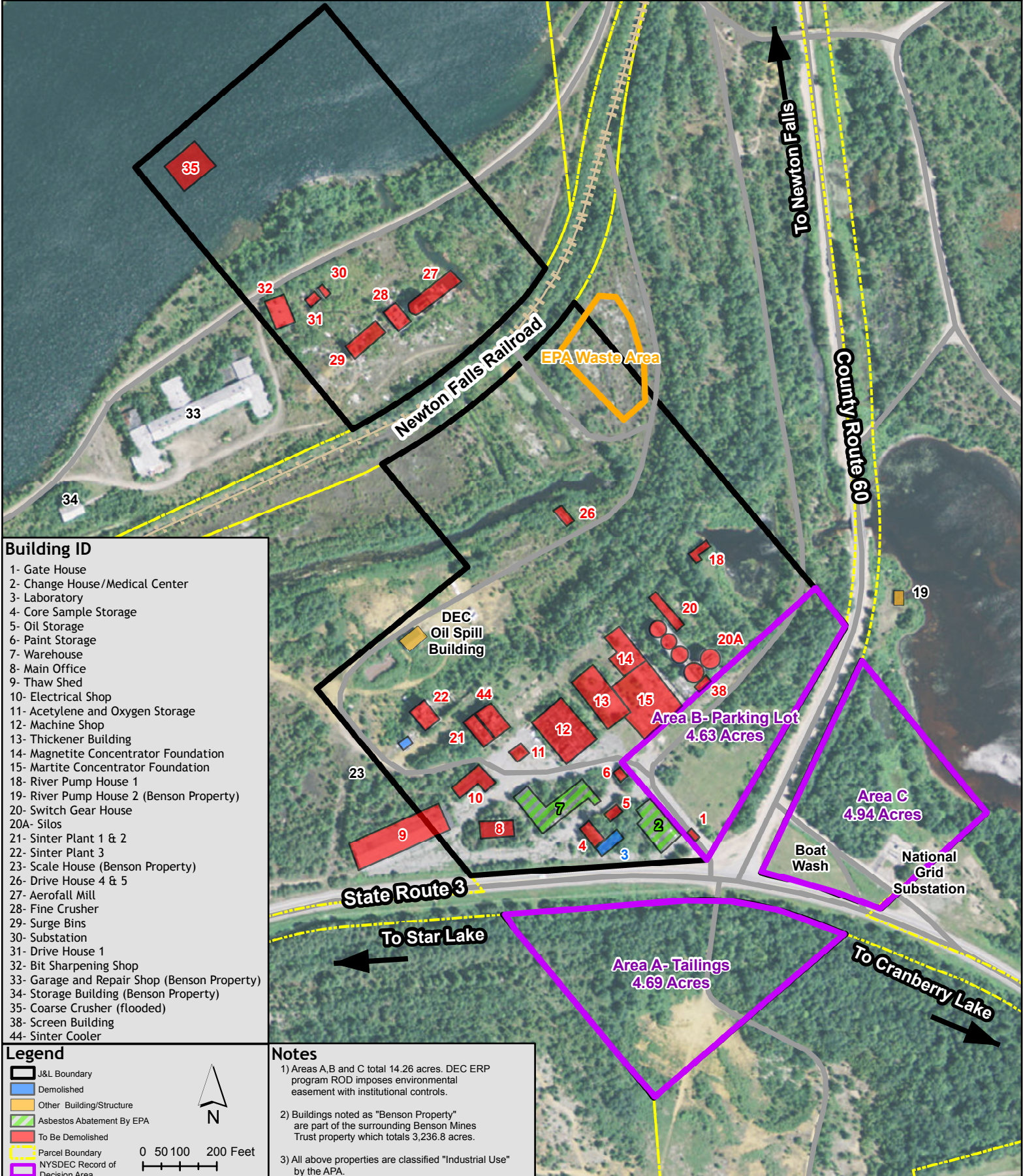


# J&L Redevelopment Site

Map 2



November 23, 2015 CI/SC





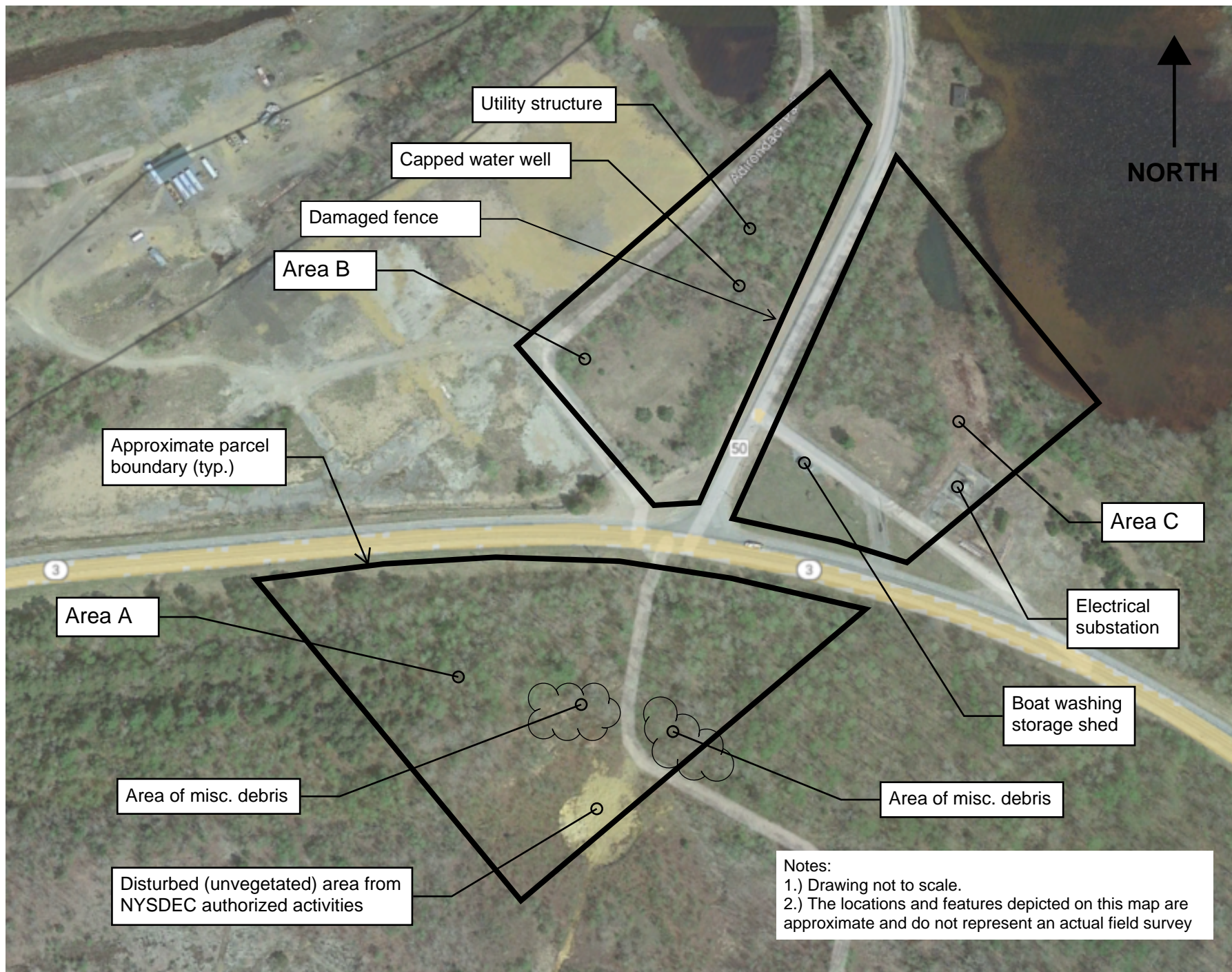


Figure 2 - May 2022 Aerial Photo from Google Earth



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



**Site No.**                      **E645029**                      **Site Details**                      **Box 1**

**Site Name** **Former Jones & Laughlin Ore Processing**

Site Address: NYS Route 3 and County Route 60                      Zip Code: 13690-  
City/Town: Clifton  
County: St Lawrence  
Site Acreage: 14.260

Reporting Period: June 29, ~~2018~~<sup>2020</sup> to June 29, 2023

The last PRR reporting period was through June 29, 2020 (not 2018).

- |   | YES                      | NO                                  |
|---|--------------------------|-------------------------------------|
| 1. Is the information above correct?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| If NO, include handwritten above or on a separate sheet.  |                          |                                     |
| 2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?         | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.**

- |  |                          |                                     |
|--|--------------------------|-------------------------------------|
| 5. Is the site currently undergoing development? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|-------------------------------------|

**Box 2**

- |  | YES                                 | NO                       |
|--|-------------------------------------|--------------------------|
| 6. Is the current site use consistent with the use(s) listed below?<br>Commercial and Industrial | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Are all ICs in place and functioning as designed?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and  
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

**A Corrective Measures Work Plan must be submitted along with this form to address these issues.**

Not Applicable

\_\_\_\_\_  
Signature of Owner, Remedial Party or Designated Representative

\_\_\_\_\_  
Date



**Description of Institutional Controls**ParcelOwnerInstitutional Control**224.000-8-2**

St Lawrence County

Ground Water Use Restriction  
Landuse Restriction  
Site Management Plan

Soil Management Plan

Placement of an environmental easement on the property that:

- requires submittal of a periodic review report and certification of the institutional and engineering controls;
- restricts the allowable use to commercial use, as defined in Part 375-1.8(g);
- restricts the use of groundwater without necessary treatment;
- requires compliance with the approved Site Management Plan.

**224.000-8-3**

St Lawrence County

Ground Water Use Restriction  
Soil Management Plan  
Landuse Restriction  
Site Management Plan

Placement of an environmental easement on the property that:

- requires submittal of a periodic review report and certification of the institutional and engineering controls;
- restricts the allowable use to commercial use, as defined in Part 375-1.8(g);
- restricts the use of groundwater without necessary treatment;
- requires compliance with the approved Site Management Plan.

**224.000-8-4**

St Lawrence County

Ground Water Use Restriction  
Soil Management Plan  
Landuse Restriction  
Site Management Plan

Placement of an environmental easement on the property that:

- requires submittal of a periodic review report and certification of the institutional and engineering controls;
- restricts the allowable use to commercial use, as defined in Part 375-1.8(g);
- restricts the use of groundwater without necessary treatment;
- requires compliance with the approved Site Management Plan.

**Description of Engineering Controls**ParcelEngineering Control**224.000-8-2**

Cover System

A site cover currently exists and will be maintained to allow for commercial use of the site. Any site redevelopment will maintain a site cover, which may consist either of the structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper one foot of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs).

**224.000-8-3**

Cover System

A site cover currently exists and will be maintained to allow for commercial use of the site. Any site redevelopment will maintain a site cover, which may consist either of the structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper one foot of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs).

**224.000-8-4**

Cover System

A site cover currently exists and will be maintained to allow for commercial use of the site. Any site redevelopment will maintain a site cover, which may consist either of the structures such as buildings, pavement, sidewalks comprising the site development or a soil cover in areas where the upper one foot of exposed surface soil will exceed the applicable soil cleanup objectives

Parcel  
(SCOs).

Engineering Control

**Box 5**

**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.**

Not Applicable

\_\_\_\_\_  
Signature of Owner, Remedial Party or Designated Representative

\_\_\_\_\_  
Date

IC CERTIFICATIONS  
SITE NO. E645029

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 Ruth A. Doyle at 48 Court Street, Canton, NY 13617 - 1169  
print name print business address

am certifying as St. Lawrence County (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

9/6/23  
Date

## EC CERTIFICATIONS

Box 7

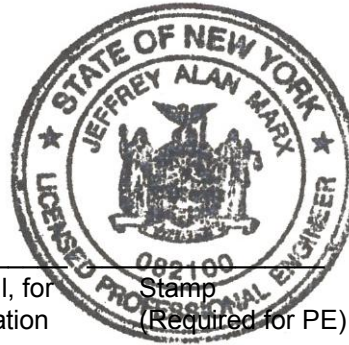
### Qualified Environmental Professional Signature

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 Jeffrey A. Marx, PE at C.T. Male Associates Engineering, Surveying,  
Architecture, Landscape Architecture & Geology, D.P.C.,  
50 Century Hill Dr., Latham, New York 12110,  
print name print business address

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

Jeffrey A. Marx  
Signature of Qualified Environmental Professional, for  
the Owner or Remedial Party, Rendering Certification



Stamp  
(Required for PE)

September 1, 2023  
Date

**COMPANY NAME**

OPERATIONS/QUALITY CONTROL

**SITE COVER INSPECTION REPORT****Former Jones & Laughlin Ore Processing Property**Weather: Cloudy, Rainy TEMP 64 °FReport No. 01Date: Aug. 31, 2023 Time: 11:00 am**ANNUAL INSPECTION ITEMS**Inspection Date: 08/31 2023

SYSTEM TO INSPECT	CONDITIONS OBSERVED	PREVIOUS CONDITION
<b>Site Cover</b> Erosion, Vegetation Deterioration, Settling, Ponding, Uplift, Washouts	<u>Condition</u> <u>Comment</u> See comments below	<u>Condition</u> <u>Comment</u> Not Applicable

Comments: No erosion, vegetation deterioration, settling, ponding (other than natural), uplift or washouts observed except  
for disturbance of embankment in Area A from NYSDEC. See C.T. Male prepared PRR dated September 1,  
2023 for additional information.



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