



**Department of  
Environmental  
Conservation**

**KATHY HOCHUL**  
Governor

**AMANDA LEFTON**  
Acting Commissioner

Sent via email to:

[jonathan.blaine@hbfuller.com](mailto:jonathan.blaine@hbfuller.com)

March 25, 2025

Jonathan Blaine  
H.B. Fuller Company  
1200 Willow Lake Boulevard  
St. Paul, Minnesota 55110

Re: Periodic Review Report (PRR)  
Former H.B. Fuller- Monarch Div. Prop. Site  
City of Geneva, Ontario County, New York  
NYSDEC Site Number: V00119

Dear Jonathan Blaine (as Certifying Party):

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH), collectively referred to as the "Departments", have completed the review of the Periodic Review Report (PRR) and IC/EC Certification dated February 10<sup>th</sup>, 2025, prepared by H & A of New York Engineering and Geology, LLP (H & A) for the certifying period of July 14<sup>th</sup>, 2023 to October 21<sup>st</sup>, 2024, for the Site listed above.

The Departments hereby accept the PRR and associated Certification. The following comments are supplied based on the recommendations made in the report:

1. "It is recommended that the SMP [Site Management Plan] be updated to capture the changes in the groundwater monitoring program and the elimination of the sub-slab vapor and indoor air sampling program."
  - The recommendation is accepted. Please submit an updated Site Management Plan that reflects current site conditions and follows the most recent version of the SMP template provided by the NYSDEC within 60 days of the date of this letter. A copy of the template will be provided with this letter. The information for the NYSDEC Project Manager must be updated to Kathryn Lovell, [kathryn.lovell@dec.ny.gov](mailto:kathryn.lovell@dec.ny.gov), (585) 438-5280.

2. "It is also recommended that the sub-slab vapor sampling points be decommissioned."
  - As stated in the 2023 PRR response letter from the Departments dated September 10, 2024, if any expansions, renovations, or new construction occurs at the Site, then sub-slab soil vapor and indoor air monitoring program will be re-evaluated. Due to the potential need to utilize the sub-slab vapor sampling points in the future, the Departments do not approve the decommissioning of the sampling points. We recommend modifying and capping sampling point SS-3, similar to how the other sampling points are constructed, to limit damage to the valve. All sampling points shall be inspected for damage during the site inspection.

Additionally, the Departments acknowledge the change of ownership that occurred on December 29<sup>th</sup>, 2024, for this site, and the notification included in the letter attached to the PRR dated February 10<sup>th</sup>, 2025. Please note that the NYSDEC must receive a 60-day Change of Use/Ownership notification for any future site owner changes.

Henceforth, the certifying period will span 12 months from October to the following October unless otherwise altered in agreement with the Department. The PRR describing Site Management activities from October 22<sup>nd</sup>, 2024 to October 21<sup>st</sup>, 2025 is due by November 20<sup>th</sup>, 2025. Please note that all site management activities performed during this period will follow guidelines from the most recent accepted version of the SMP. You may receive a courtesy reminder letter and updated certification form 45-days prior to the due date. Regardless of receipt of the reminder notice, the next PRR, including the signed Certification form, is due on the date specified above.

Please contact me at [kathryn.lovell@dec.ny.gov](mailto:kathryn.lovell@dec.ny.gov) or at (585) 438-5280 to discuss any questions or concerns regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathryn Lovell', with a stylized, flowing script.

Kathryn Lovell  
Project Manager

ec:

Derek Sharron (H.B. Fuller)

Chase Romney (Fortress Investment Group)

William Turner (Fortress Investment Group)

Jack Spicuzza (Univar)

Jeff Rowe (Univar)

Scott Anderson (H & A)

Glenn White (H & A)

Justin Deming (NYSDOH)

Julia Kenney (NYSDOH)

David Pratt (NYSDEC)

Adam Morgan (NYSDEC)

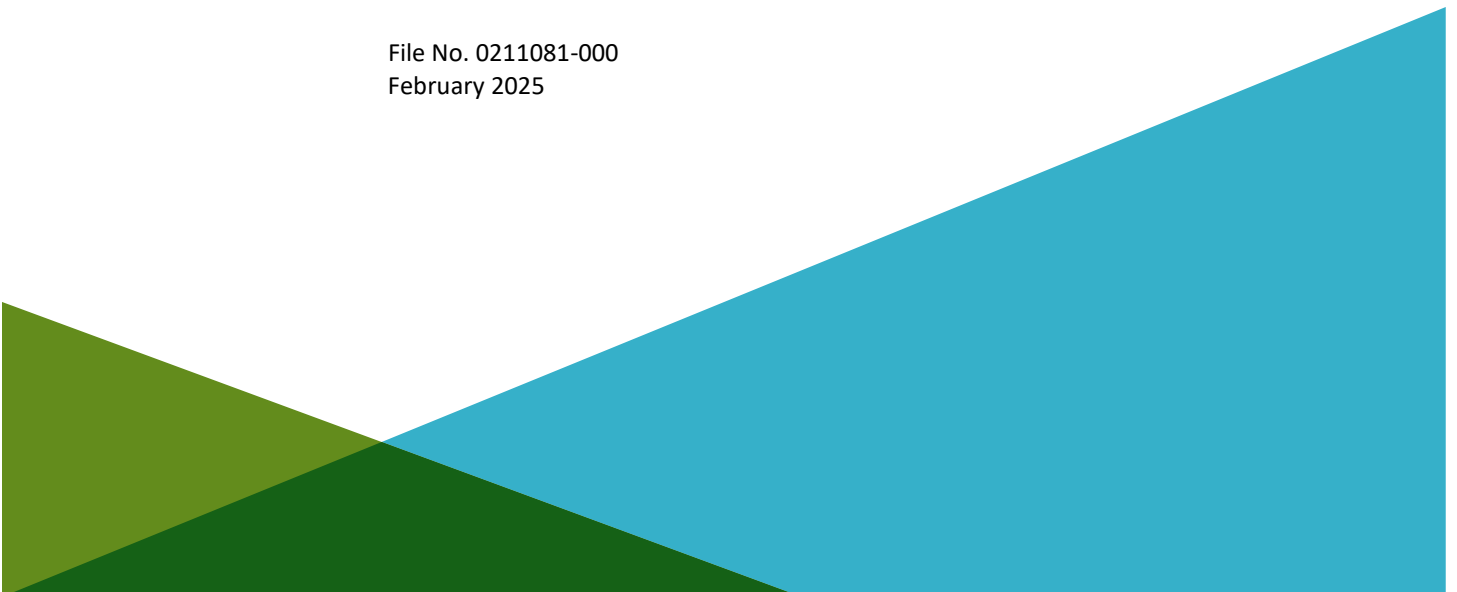
Joshua Ramsey (NYSDEC)

2024 PERIODIC REVIEW REPORT  
FORMER MONARCH CHEMICALS FACILITY  
61 GATES AVENUE  
GENEVA, NEW YORK 14456

by  
H & A of New York Engineering and Geology, LLP  
Rochester, New York

for  
New York Department of Environmental Conservation  
Avon, New York

File No. 0211081-000  
February 2025





H & A OF NEW YORK ENGINEERING  
AND GEOLOGY, LLP  
260 E Main St.  
Suite 2100  
Rochester, NY 14604  
585.359.9000

10 February 2025  
File No. 02110081-000

New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

Attention: Joshua J. Ramsey  
Project Manager

Subject: 2024 Periodic Review Report  
Former Monarch Chemicals Facility  
61 Gates Avenue  
Geneva, New York 14456  
NYSDEC Site No. V00119

Dear Mr. Ramsey:

On behalf of H.B. Fuller Company (Fuller), H & A of New York Engineering and Geology, LLP (Haley & Aldrich of New York) is submitting this annual *Periodic Review Report* (PRR) for the Former Monarch Chemicals Facility located at 61 Gates Avenue, Geneva, New York. This report summarizes activities, operations, and monitoring as required by the New York State Department of Environmental Conservation (NYSDEC)-approved Site Management Plan (SMP), dated 22 September 2017. This report covers the period from 14 July 2023 through 21 October 2024.

Please note that the subject Site was sold on 29 December 2024. Univar Solutions, the previous owner and current operator, will continue to operate the Site under a 20-year lease agreement with no changes to current operations. The new owner of the Site is:

FNLR Compounds Matter Too LLC  
c/o Fortress Investment Group LLC  
1345 Avenue of the Americas, 46th Floor  
New York, New York 10105

Notices to be sent to:

Fortress Investment Group LLC  
11611 San Vicente Blvd., 10th Floor  
Los Angeles, California 90049  
Attn.: William Turner and Chase Romney  
Email: wturner@fortress.com and cromney@fortress.com

10 February 2025

Page 2

Please contact the undersigned with any questions regarding this report.

Sincerely yours,

**H & A OF NEW YORK ENGINEERING AND GEOLOGY, LLP**



Santa E. McKenna, P.G.  
Assistant Project Manager



Glenn M. White, CHMM  
Senior Associate

Enclosures

c: H.B. Fuller; Attn: Jonathan Blaine  
Univar; Attn: Jack Spicuzza; Mark Metcalf; Jeff Rowe  
Haley & Aldrich, Inc.; Attn: Scott Anderson and Emily Heuer  
NYSDOH; Attn: Justin Deming and Julia Kenney  
NYSDEC; Attn: David Pratt and Charlotte Theobald

[https://haleyaldrich.sharepoint.com/sites/HBFuller/Shared Documents/0211081.GenevaSite/2024 PRR/2025\\_0210\\_Monarch Geneva 2024 PRR\\_F.docx](https://haleyaldrich.sharepoint.com/sites/HBFuller/Shared Documents/0211081.GenevaSite/2024 PRR/2025_0210_Monarch Geneva 2024 PRR_F.docx)

**SIGNATURE PAGE FOR**

**2024 PERIODIC REVIEW REPORT  
FORMER MONARCH CHEMICALS FACILITY  
61 GATES AVENUE  
GENEVA NEW YORK 14456**

**PREPARED FOR  
NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
AVON, NEW YORK**

PREPARED BY:



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Santa E. McKenna, P.G.  
Assistant Project Manager  
H & A of New York Engineering and Geology, LLP

REVIEWED AND APPROVED BY:



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Glenn M. White, CHMM  
Senior Associate  
H & A of New York Engineering and Geology, LLP

## Executive Summary

On behalf of H.B. Fuller Company (Fuller), H & A of New York Engineering and Geology, LLP (Haley & Aldrich of New York) has prepared this annual *Periodic Review Report* (PRR) for the Former Monarch Chemicals Facility located at 61 Gates Avenue, Geneva, New York (Site). This report summarizes activities, operations, and monitoring as required by the New York State Department of Environmental Conservation (NYSDEC)-approved Site Management Plan (SMP), dated 22 September 2017. This report covers the period from 14 July 2023 through 21 October 2024. Groundwater monitoring and soil vapor and indoor air sampling were not required or conducted during the reporting period. The institutional controls (ICs) and engineering controls (ECs) for the Site were in place and effective during the reporting period. The next reporting period is anticipated to cover the period 22 October 2024 through 22 October 2025.



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# 1. Site Overview<sup>1</sup>

## 1.1 SITE HISTORY AND REMEDIAL PROGRAM

The former Monarch Chemicals Facility (Site) is located at 61 Gates Avenue, Ontario County, in Geneva, New York (Figure 1), a manufacturing plant with over 120 years of industrial operations. In 1979, Monarch Chemical Company (Monarch), a former operating division of the H.B. Fuller Company (Fuller), bought Antical Chemical, which operated on the 1.7-acre property storing, assembling, mixing, and packaging powdered and liquid cleaners and sanitizers for dairy-related industries. In 1996, Fuller sold the property and business to HoltraChem Distribution Inc., which was later acquired by Basic Chemical Solutions, LLC (BCS). BCS later merged with Univar Solutions (Univar), a global distributor of commodity chemicals, which produces inorganic mineral acids and bases, such as caustic soda, bleach, and sulfuric and hydrochloric acids at the Site.

The Site is industrially developed with a manufacturing plant occupying approximately 33,700 square feet, with accompanying loading and unloading areas, parking lots, and an aboveground storage tank (AST) Containment Area. Access to the Site is via Gates Avenue, which is contiguous along the southern property boundary. The Site is located in an industrial area of Geneva, New York, north of Seneca Lake. Properties bordering the Site include a furniture manufacturer (CCN International) to the north and railroad tracks (Finger Lakes Railroad) to the east, including an ephemeral stream and adjacent vacant lots and residences farther east. Brownfield development properties, including vacated manufacturing facilities and residential developments, are located to the south and west.

In 1996, petroleum impacts were encountered in soil and groundwater north of the manufacturing plant (Figure 2) during the removal of a 3,000-gallon underground storage tank (UST). Also in 1996, methyl blue active substances (MBAS) were detected beneath the manufacturing plant in soil and groundwater, extending east to the drainage ditch (Figure 2). At this same time, chlorinated volatile organic compounds (VOCs) were detected north of the plant near and beneath the AST Containment Area, impacting shallow soils and groundwater to a depth of approximately 14 feet below ground surface (bgs). These conditions led to investigations into potential surface and subsurface impacts of soil, soil vapor, surface water, and groundwater under authority of the New York State Department of Environmental Conservation (NYSDEC), Site No.V00119.

Remedial investigation (RI) activities began in early 1998 and were completed in June 2012. NYSDEC approved the RFI on 21 February 2013. The highest VOC concentrations in groundwater were centered at monitoring well MW-118, which is considered the VOC mass source area. Prior to implementing Interim Remedial Measure (IRM) activities in October 2008, tetrachloroethene (PCE) groundwater concentrations at MW-118 reached 4,900 micrograms per liter (µg/L), and trichloroethene (TCE) concentrations at MW-118 reached 2,700 µg/L. Pre-IRM, groundwater total VOC (TVOC) levels in January 2006 reached 17,126 µg/L, and due to the apparent age of the release, multiple VOC degradation products were consistently detected in groundwater prior to implementing the IRM.

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<sup>1</sup> Section 1 of this Period Review Report has been sourced directly from the *2023 Periodic Review Report Former Monarch Chemical Facility, 61 Gates Avenue, Geneva, New York 14456* prepared by Pinnacle Engineering, dated 10 August 2023.

Contemporaneously, corrective action activities were conducted in October 2008 by implementing the IRM described in the *Enhanced Reductive Dechlorination In-Situ Bioremediation Interim Remedial Measures Workplan* (20 May 2008), *IRM Groundwater Monitoring Report* (15 January 2010), and the *Final Engineering Report* (8 December 2017). The objective of this IRM was treating and remediating VOCs in soil and groundwater, resulting in a corresponding reduction of soil vapor intrusion (SVI) risks to workers in the BCS manufacturing plant. The IRM was carried out via injection of a carbon substrate of emulsified vegetable oil (EVO) across the groundwater plume north and east of the plant, coupled in the source area with injections of nano-structured zerovalent iron (nZVI).

## **2. Evaluate Remedy Performance, Effectiveness, and Protectiveness**

Multiple reports have been submitted pre- and post-IRM, and subsequent Periodic Review Reports summarizing monitoring results from historical sampling events. These data are not reiterated herein.

As determined by the NYSDEC Decision Document and based on the implementation of the IRM, the investigation findings indicate the Site no longer poses a threat to human health to the environment and there are no completed human pathways for contaminants of concern in groundwater, surface water, sediment, or sub-slab soil vapor to potential receptors. Sub-slab VOC concentrations and chlorinated VOCs in indoor air have decreased. Long-term groundwater monitoring results supported reducing the sampling program for groundwater to select wells on a biannual schedule and eliminating soil vapor and indoor air monitoring. The request to reduce groundwater sampling of select wells and discontinue soil vapor and indoor air sampling was made in the 2023 PRR and approved by the NYSDEC in letter dated 10 September 2024.

### **3. Institutional Control/Engineering Control Plan Compliance**

The Institutional Controls (ICs) and Engineering Controls (ECs) for the Site are summarized below and were in place and effective during the reporting period. The completed NYSDEC Site Management Periodic Review Report Notice Institutional and Engineering Controls Certification Form is included as Appendix B.

#### **3.1 INSTITUTIONAL CONTROLS**

The following ICs are in place at the Site:

1. Land Use Restriction
2. IC/EC Plan
3. Groundwater Use Restriction
4. Monitoring Plan

The Site Management Plan (SMP) was prepared by Pinnacle Engineering and dated 22 September 2017. The SMP includes a groundwater use restriction, restriction of the Site to commercial and/or industrial use, annual periodic review reports (PRRs) and certification of ICs and ECs, and annual groundwater and sub-slab/indoor air monitoring plans. Groundwater monitoring and soil vapor and indoor air sampling were not required or conducted during the reporting period. In their letter dated 10 September 2024, NYSDEC approved eliminating the sub-slab soil vapor and indoor air monitoring program. The program would only be reinstated if any alterations to the on-Site building foundation or new building construction occurred. No building foundation modifications or new construction occurred during the 2024 reporting period. The NYSDEC also approved a reduction in the number of wells to be sampled in monitoring events moving forward. The next groundwater monitoring event is tentatively scheduled for spring 2025.

#### **3.2 ENGINEERING CONTROLS**

The following ECs are in place at the Site:

1. Site cover comprising vegetation, gravel, concrete, asphalt pavement, and existing buildings.

##### **3.2.1 Annual Site Inspection**

The purpose of the annual Site inspection is to confirm the Site cover has not changed, is in place and effective, and the required monitoring program components are in place. Haley & Aldrich of New York completed the annual Site inspection on 21 October 2024. Glenn White performed the inspection and was escorted by Jeff Rowe of Univar (Site Owner). During the Site inspection, Mr. Rowe confirmed that the ICs are in place and the Site cover has not changed and has not otherwise been disturbed during the reporting period. Mr. Rowe also indicated the following permits were issued for the Site during the reporting period:

- New York State Chemical Bulk Storage Tank Permit was renewed in July 2023; and
- Town of Geneva Operating Permit was renewed in October 2024.

Mr. White confirmed that the cover is in place. Site surface cover types are presented in Figure 3. A Site inspection photo log is included in Appendix A.

## 4. Monitoring Compliance Report

Per the SMP, select groundwater monitoring wells and sub-slab soil vapor and co-located indoor air monitoring locations will be sampled biannually.

There are 10 groundwater monitoring wells (MW-114, MW-115, MW-115d, MW-116, MW-117, MW-118, MW-121, MW-122, MW-124s, and MW-124d) and four sub-slab vapor monitoring probes (SS-1, SS-2, SS-3, and SS-4) remaining on the Site. These monitoring wells are a subset of wells installed as part of the RI and subsurface investigations. The four sub-slab vapor points were installed in 2007. Sample locations are presented on Figure 2.

On 10 September 2024, NYSDEC approved eliminating the sub-slab soil vapor and indoor air monitoring program from the SMP. The program would only be reinstated if any alterations to the on-Site building foundation or new building construction occurred. No building foundation modifications or new construction occurred during the 2024 reporting period. The NYSDEC also approved a reduction in the number of wells sampled to the following groundwater monitoring wells beginning in 2025: MW-114, MW-115, MW-117, MW-118, MW-122, and MW-124d. The groundwater sampling activities will be completed in accordance with the SMP and current ASTM International (ASTM) standards.



## 5. Conclusions and Recommendations

The ICs and ECs for the Site were in place and effective during the reporting period from 14 July 2023 through 21 October 2024. Groundwater monitoring was not conducted during the reporting period. The next required groundwater monitoring event is tentatively scheduled for the 2025 reporting period. Future groundwater monitoring will be conducted at fewer monitoring well locations and sub-slab vapor and indoor air monitoring were also eliminated in accordance with the NYSDEC's approval dated 10 September 2024.

It is recommended that the SMP be updated to capture the changes in the groundwater monitoring program and the elimination of the sub-slab vapor and indoor air sampling program. It is also recommended that the sub-slab vapor sampling points be decommissioned.

## References

ECOR Solutions, Inc., 2007. *Enhanced Reductive Dechlorination In-Situ Bioremediation, Interim Remedial Measures Workplan, Former Monarch Chemicals Facility, 61 Gates Avenue, Geneva, New York.* 7 December 2007 (revised 20 May 2008).

ECOR Solutions, Inc., 2010. *Interim Remedial Measures (IRM) Groundwater Monitoring Report, Former Monarch Chemicals Facility, 61 Gates Avenue, Geneva, New York.* 15 January.

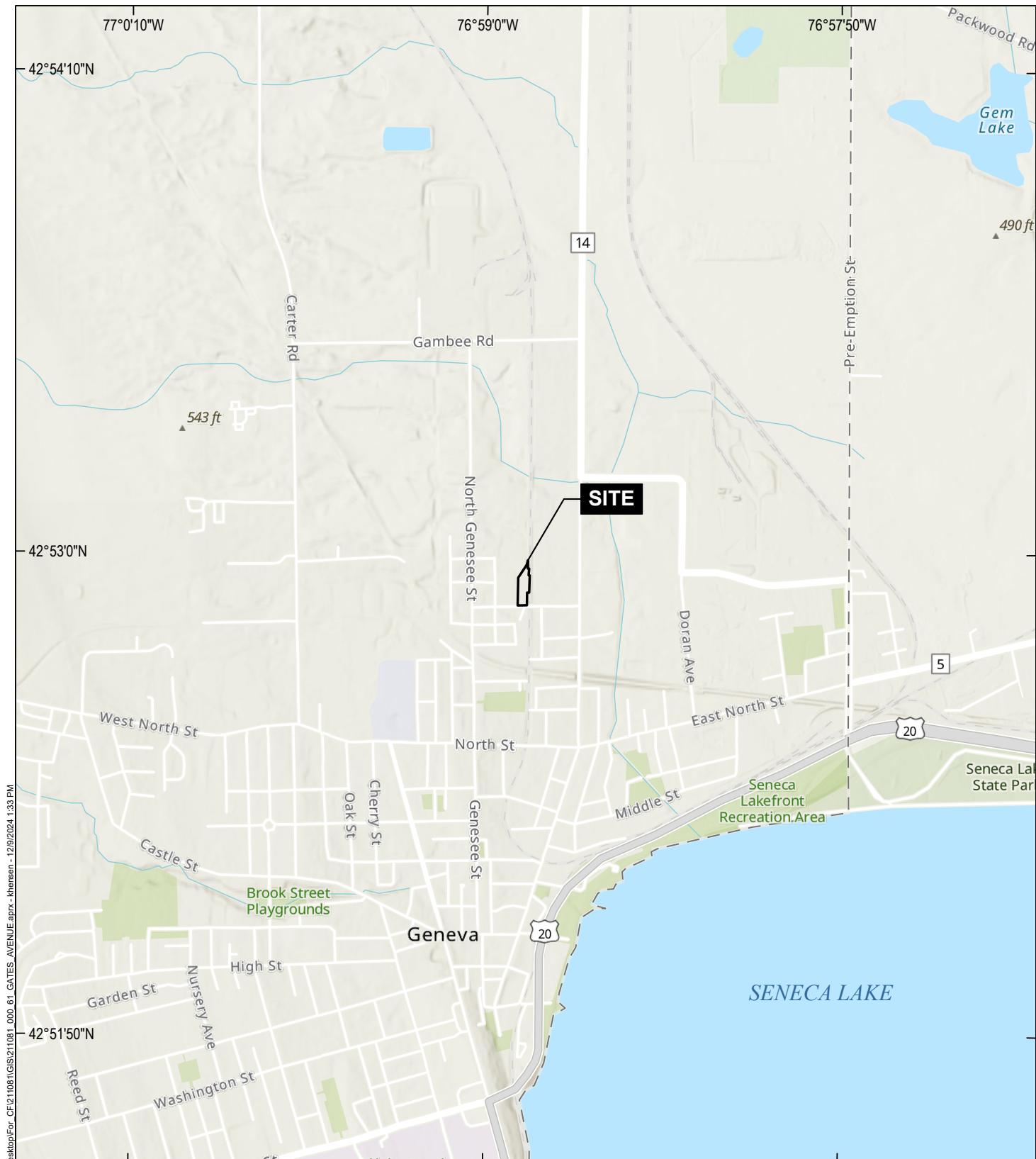
Pinnacle Engineering, Inc., 2017a. *Site Management Plan, Former Monarch Chemicals Facility, Geneva, New York.* 22 September.

Pinnacle Engineering, Inc., 2017b. *Final Engineering Report, Former Monarch Chemicals Facility, Geneva, New York.* 8 December.

Pinnacle Engineering, Inc., 2023. *2023 Periodic Review Report, Former Monarch Chemicals Facility, Geneva, New York.* 10 August.

[https://haleyaldrich.sharepoint.com/sites/HBFuller/Shared Documents/0211081.GenevaSite/2024 PRR/2025\\_0210\\_Monarch Geneva 2024 PRR\\_F.docx](https://haleyaldrich.sharepoint.com/sites/HBFuller/Shared Documents/0211081.GenevaSite/2024 PRR/2025_0210_Monarch Geneva 2024 PRR_F.docx)

## FIGURES



GIS: C:\Users\khensen\OneDrive - haleyaldrich.com\Desktop\For CF211081\GIS\211081\_000\_61\_GATES\_AVENUE.aprx - khensen - 12/29/2024 1:33 PM



MAP SOURCE: ESRI  
SITE COORDINATES: 42°52'55"N, 76°58'52"W

**HALEY  
ALDRICH**

FORMER MONARCH CHEMICALS COMPANY  
61 GATES AVENUE  
GENEVA, NEW YORK

## PROJECT LOCUS

APPROXIMATE SCALE: 1 IN = 2000 FT  
DECEMBER 2024

**FIGURE 1**



**NOTE**  
FIGURE 2 OF THIS PERIOD REVIEW REPORT HAS BEEN SOURCED DIRECTLY FROM THE "2023 PERIODIC REVIEW REPORT FORMER MONARCH CHEMICAL FACILITY, 61 GATES AVENUE, GENEVA, NEW YORK 14456" PREPARED BY PINNACLE ENGINEERING, DATED 10 AUGUST 2023.

**HALEY  
ALDRICH**

FORMER MONARCH CHEMICALS COMPANY  
61 GATES AVENUE  
GENEVA, NEW YORK

## SITE MONITORING LOCATIONS

DECEMBER 2024



**APPENDIX A**  
**Site Inspection Photo Log**



**Former Monarch Chemicals Facility  
Geneva, New York  
File No. 02110081-000  
Date Photographs Taken: 21 October 2024**

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***Photo 1: Front of Facility from Gates Avenue***



***Photo 2: West side of Facility looking north***



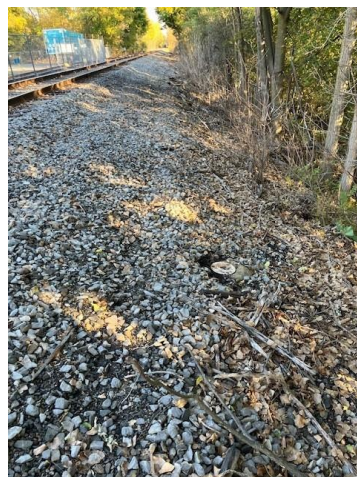
***Photo 3: West side of Facility looking south***



***Photo 4: North of Facility (gravel cover) looking south***



***Photo 5: East side of Facility looking south***



***Photo 6: East side of Facility looking north***



**APPENDIX B**  
**IC/EC Certification Form**



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



**Site Details**

**Box 1**

**Site No.**            **V00119**

**Site Name** **Former H.B. Fuller- Monarch Div. Prop.**

Site Address: 61 Gates Avenue      Zip Code: 14456

City/Town: Geneva

County: Ontario

Site Acreage: 1.740

Reporting Period: July 14, 2023 to ~~July 14, 2024~~ October 21, 2024

YES    NO

1. Is the information above correct?

x      ☐

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?

☐      X

3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?

☐      x

4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?

x      ☐

**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?

☐      x

**Box 2**

YES    NO

6. Is the current site use consistent with the use(s) listed below?  
Commercial and Industrial

x      ☐

7. Are all ICs in place and functioning as designed?

x      ☐

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

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

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

\_\_\_\_\_  
Date

**Description of Institutional Controls**ParcelOwner

Universal USA

FNLR Compounds Matter Too LLC

Institutional ControlGround Water Use Restriction  
Landuse Restriction  
Site Management Plan  
IC/EC Plan

Monitoring Plan

A Site Management Plan is in place for the site and includes:

- groundwater use restriction
- restriction of the site to commercial and/or industrial use
- annual periodic review reports and certification of institutional and engineering controls
- annual groundwater and sub-slab/indoor air monitoring

**Description of Engineering Controls**ParcelEngineering Control

Cover System

Engineering controls as described in the Site Management Plan include:

- one foot cover consisting of soil, gravel, building, asphalt, concrete, etc.

### 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

x ☐

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

x ☐

**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. V00119**

**Box 6**

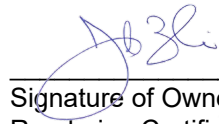
**SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE**

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 Jonathan Blaine at 1200 Willow Lake Boulevard, St.Paul, MN,  
print name print business address

am certifying as Remedial Party (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

February 3, 2025  
\_\_\_\_\_  
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 Glenn M. White, CHMM at Haley & Aldrich 260 E Main Street| Suite 2100  
print name print business address Rochester, NY 14604,

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



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

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

February 3, 2024

**Enclosure 3**  
**Periodic Review Report (PRR) General Guidance**

- I. Executive Summary: (1/2-page or less)
  - A. Provide a brief summary of site, nature and extent of contamination, and remedial history.
  - B. Effectiveness of the Remedial Program - Provide overall conclusions regarding;
    - 1. progress made during the reporting period toward meeting the remedial objectives for the site
    - 2. the ultimate ability of the remedial program to achieve the remedial objectives for the site.
  - C. Compliance
    - 1. Identify any areas of non-compliance regarding the major elements of the Site Management Plan (SMP, i.e., the Institutional/Engineering Control (IC/EC) Plan, the Monitoring Plan, and the Operation & Maintenance (O&M) Plan).
    - 2. Propose steps to be taken and a schedule to correct any areas of non-compliance.
  - D. Recommendations
    - 1. recommend whether any changes to the SMP are needed
    - 2. recommend any changes to the frequency for submittal of PRRs (increase, decrease)
    - 3. recommend whether the requirements for discontinuing site management have been met.
- II. Site Overview (one page or less)
  - A. Describe the site location, boundaries (figure), significant features, surrounding area, and the nature and extent of contamination prior to site remediation.
  - B. Describe the chronology of the main features of the remedial program for the site, the components of the selected remedy, cleanup goals, site closure criteria, and any significant changes to the selected remedy that have been made since remedy selection.
- III. Evaluate Remedy Performance, Effectiveness, and Protectiveness  
Using tables, graphs, charts and bulleted text to the extent practicable, describe the effectiveness of the remedy in achieving the remedial goals for the site. Base findings, recommendations, and conclusions on objective data. Evaluations and should be presented simply and concisely.
- IV. IC/EC Plan Compliance Report (if applicable)
  - A. IC/EC Requirements and Compliance
    - 1. Describe each control, its objective, and how performance of the control is evaluated.
    - 2. Summarize the status of each goal (whether it is fully in place and its effectiveness).
    - 3. Corrective Measures: describe steps proposed to address any deficiencies in ICECs.
    - 4. Conclusions and recommendations for changes.
  - B. IC/EC Certification
    - 1. The certification must be complete (even if there are IC/EC deficiencies), and certified by the appropriate party as set forth in a Department-approved certification form(s).
- V. Monitoring Plan Compliance Report (if applicable)
  - A. Components of the Monitoring Plan (tabular presentations preferred) - Describe the requirements of the monitoring plan by media (i.e., soil, groundwater, sediment, etc.) and by any remedial technologies being used at the site.
  - B. Summary of Monitoring Completed During Reporting Period - Describe the monitoring tasks actually completed during this PRR reporting period. Tables and/or figures should be used to show all data.
  - C. Comparisons with Remedial Objectives - Compare the results of all monitoring with the remedial objectives for the site. Include trend analyses where possible.
  - D. Monitoring Deficiencies - Describe any ways in which monitoring did not fully comply with the monitoring plan.
  - E. Conclusions and Recommendations for Changes - Provide overall conclusions regarding the monitoring completed and the resulting evaluations regarding remedial effectiveness.
- VI. Operation & Maintenance (O&M) Plan Compliance Report (if applicable)
  - A. Components of O&M Plan - Describe the requirements of the O&M plan including required activities, frequencies, recordkeeping, etc.
  - B. Summary of O&M Completed During Reporting Period - Describe the O&M tasks actually completed during this PRR reporting period.
  - C. Evaluation of Remedial Systems - Based upon the results of the O&M activities completed, evaluated

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

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

#### VII. Overall PRR Conclusions and Recommendations

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

#### VIII. Additional Guidance

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