

OCT 16 2015

OFFICE OF HW-PERMITTING

Direct Dial: 804.420.6422
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October 12, 2015



Michelle Payne
Regulatory Analyst/ARARs and UECA Coordinator
Virginia Department of Environmental Quality
629 E. Main Street
Richmond, VA 23219

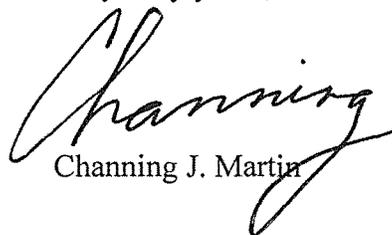
Re: Emporia Foundry, Inc.
EPA ID Number: VAD023720105

Dear Michelle:

I enclose a copy of the UECA covenant executed by Emporia Foundry, Inc. that was recorded in the Clerk's Office of the Circuit Court of Greensville County on September 24, 2015. I also enclose a copy of the letters I sent transmitting the recorded UECA covenant to the Chief Administrative Officer of Greensville County and to the Substitute Trustee.

Please let me know if you have questions.

Very truly yours,



Channing J. Martin

CJM/rno

Enclosures

cc: John Campbell
Julia King-Collins ✓

29223998_1.docx



OFFICIAL RECEIPT
GREENSVILLE CIRCUIT COURT
DEED RECEIPT

DATE: 09/24/15 TIME: 15:51:26 ACCOUNT: 081CLR150001013 RECEIPT: 15000004727
CASHIER: AEW REG: GV10 TYPE: OTHER PAYMENT: FULL PAYMENT
INSTRUMENT : 150001013 BOOK: PAGE: RECORDED: 09/24/15 AT 15:51
GRANTOR: EMPORIA FOUNDRY INC EX: N LOC: CI
GRANTEE: EMPORIA FOUNDRY INC EX: N PCT: 100%
AND ADDRESS : 800 BERGEN ST HARRISON, NJ. 07029
RECEIVED OF : WILLIAMS MULLEN CLARK & DOBBIN DATE OF DEED: 08/21/15
CHECK: \$75.00 520390
DESCRIPTION 1: PARCELS CITY OF EMPORIA PAGES: 28 OP: 2
2: SEE PB 16 PGS 182 & 183 NAMES: 0
CONSIDERATION: .00 A/VAL: .00 MAP:
PIN:
301 DEEDS 55.50 145 VSLF 4.50
106 TECHNOLOGY TRST FND 15.00
TENDERED : 75.00
AMOUNT PAID: 75.00
CHANGE AMT : .00

CLERK OF COURT: ROBERT C. WRENN

PAYOR'S COPY
RECEIPT COPY 1 OF 2

150001013

Tax Map or GPIN No.: 144-3-1A, 144-3-1B and 144-A-4.

Prepared by: Williams Mullen
c/o Channing J. Martin, Esq.
P.O. Box 1320
Richmond, VA 23218

Remediation Program Site ID #: VAD023720105

UECA ENVIRONMENTAL COVENANT

This environmental covenant is made and entered into as of the 21st day of August, 2015, by and between EMPORIA FOUNDRY, INC., whose address is 800 Bergen Street, Harrison, New Jersey 07029 (hereinafter referred to as the “Grantor” or “Owner”), and EMPORIA FOUNDRY, INC., (hereinafter referred to as the “Grantee” or “Holder”) whose address is 800 Bergen Street, Harrison, New Jersey 07029.

The Virginia Department of Environmental Quality, whose address is 629 East Main Street, Richmond, Virginia 23219 (hereinafter referred to as the “Agency”) also joins in this environmental covenant.

This environmental covenant is executed pursuant to the Virginia Uniform Environmental Covenants Act, § 10.1-1238 et seq. of the Code of Virginia (UECA). This environmental covenant subjects the Property identified in Paragraph 1 to the activity and use limitations in this document.

1. Property affected.

The property affected (Property) by this environmental covenant is located at 620 Reese Street, Emporia, Virginia 23847, and is further described as follows:

PARCEL 1: (Tax Map No. 144-3-1A) –Exhibit B Restriction Area I Polygon

ALL that certain six and four-tenths (6.4) acre lot or parcel of land on Reese Street in the Town of Emporia, Belfield District, Greensville County, Virginia, adjoining the Emporia Foundry Inc. land and being the identical property conveyed to Emporia Foundry Properties, Inc. by Deed dated January 24, 1964, from Lewis N. Miller of record in Deed Book 85, page 301 in the Clerk’s Office, Circuit Court, Greensville County, Virginia.

BEING the same real estate conveyed to Emporia Foundry, Inc. by Deed from Emporia Foundry Properties, Inc. dated May 22, 1964, and recorded in the Clerk’s Office of the Circuit Court of Greensville County, Virginia, in Deed Book 87, page 46.

PARCEL 2: (Tax Map No. 144-3-1B) – Exhibit B – Restriction Area II Polygon, Exhibit A - Western Portion of Landfill Polygon

ALL that certain tract or parcel of land lying and being in Greensville County, Virginia, containing 13.4 acres, more or less, and designated as “Block A – Parcel 1B” on a plat entitled “Plat of Survey of Property Owned by J. Clifford Miller, Jr.,” made by S. G. Keedwell, C.L.S., dated November 29, 1963, revised January 16, 1964, reference being hereby made for a more particular description, said plat being attached to and recorded in the Clerk’s Office, Circuit Court, Greensville County, Virginia, with that certain Deed dated January 21, 1964, by which Lewis N. Miller acquired certain lands including the land herein conveyed from J. Clifford Miller, Jr. and Lizora S. Miller.

BEING the same real estate conveyed to Emporia Foundry, Inc., by Deed from Lewis N. Miller and Deborah S. Miller, dated January 24, 1964, and recorded in the aforesaid Clerk’s Office in Deed Book 85, page 299.

SUBJECT TO the thirty (30) foot right of way as set forth in the above mentioned Deed.

PARCEL 3: (Tax Map No. 144-A-4) – Exhibit A – Eastern Portion of Landfill Polygon

ALL that certain tract or parcel of land lying and being in Greensville County, Virginia, containing 6.4 acres more or less, and designated as “Block A – Parcel 1A” on a plat entitled “Plat of Survey Owned by J. Clifford Miller, Jr.,” made by S. G. Keedwell, C.L.S., dated November 29, 1963, revised January 16, 1964, reference being hereby made for a more particular description, said plat being attached to and recorded in the Clerk’s Office, Circuit Court, Greensville County, Virginia, with that certain Deed dated January 21, 1964, by which Lewis N. Miller acquired certain lands including the land herein conveyed from J. Clifford Miller, Jr. and Lizora S. Miller.

BEING the same real estate conveyed to Emporia Foundry, Inc., by Deed from Lewis N. Miller and Deborah S. Miller, dated January 24, 1964, and recorded in the aforesaid Clerk’s Office in Deed Book 85, page 301.

2. Description of Contamination & Remedy.

- a. Identify the name and location of any administrative record for the environmental response project reflected in this UECA environmental covenant.

The Administrative Record for this environmental response project is known as “Emporia Foundry, Inc., 620 Reese Street, Emporia, Virginia, EPA ID No. VAD023720105.” A copy may be obtained from the Virginia Department of Environmental Quality, 629 East Main Street, Richmond, Virginia.

- b. Describe the contamination and remedy relating to the Property, including descriptions of the Property before remedy implementation; contaminants of concern; pathways of exposure;

limits on exposure; location and extent of contamination; and the remedy/corrective action undertaken.

Emporia Foundry is located in an industrial area at 620 Reese Street in Emporia, Virginia. The facility consists of 20.16 acres and lies between multi-family residential areas to the North, and commercial/industrial areas to the South and East. The Facility manufactured gray-iron, municipal castings by mold-casting methods for use by municipal governments and the construction industry. Manufactured castings include manhole covers, manhole cover receptacles, and drain grates. The Facility has ceased operations and is in the process of decommissioning all equipment and closing the Facility.

PARCEL 2 (Tax Map No. 144-3-1B) and PARCEL 3 (Tax Map No. 144-A-4) on the foundry site contain a closed hazardous waste landfill that is 3.82 acres (Landfill) and is shown on the survey plat attached hereto as Exhibit A dated October 7, 2014 prepared by James T. Bailey, L.S. entitled "Plat of Survey for Closed Hazardous Waste Landfill, Emporia Foundry, Inc.". The Landfill contains foundry wastes that are RCRA characteristic wastes for lead, arsenic and/or chromium. The Landfill, a regulated unit (identified as SWMU 3 in the Facility's Hazardous Waste Management Post-Closure Care Permit), is bounded on the north and east by Little Metcalf Branch, on the south by CSX Railroad tracks, and on the west by a drainage ditch. The surface is generally level on the western sections but slopes upward to a steep bank on the eastern end of the Landfill.

Between 1965 and 1975, foundry wastes consisting of cupola slag, spent casting sand, and spent steel shot were disposed in the landfill. Between January 1975, and December 1981, cupola baghouse dust was included with other wastes. Between January 1982, and the fall of 1982, foundry waste without cupola baghouse dust was disposed in the Landfill, and by December of 1982, the Landfill disposal operations ceased. The Landfill was certified closed effective February 15, 1984 by the Virginia Department of Waste Management, predecessor of the Agency.

Closure activities consisted of re-grading the Landfill, directing surface drainage to an on-site lagoon (later removed) and the application of a clay cap to perimeter slopes. The Permittee performed post-closure care for the closed Landfill identified in Permit Section III.B.1. from February 15, 1984 through February 15, 2014, [thirty (30) years after the date closure was certified].

Emporia Foundry operated under a Closure and Post Closure Care Plan, dated April 19, 1983, until it was issued a Post-Closure Care Permit in 1994 for its closed Landfill. The Permit included requirements for initiation of a Groundwater Compliance Monitoring Program because it was determined during detection monitoring (begun in 1985) that there had been a release of constituents from the Landfill above background concentrations. However, the concentrations of detected constituents in groundwater at the closed Landfill unit boundary did not exceed, and do not now exceed, the GPS specified in the Permit (based on either EPA Maximum Contaminant Level (MCLs) or VDEQ Alternative Concentration Limits (ACLs), or site background).

The Facility's Permit, effective October 25, 2005, required Emporia Foundry to perform certain site-wide corrective action investigations. Investigations were conducted from 2008 to 2013 pursuant to Phase I and II RCRA Facility Investigation (RFI) Work Plans. The investigations assessed whether surface water, sediment, soil or groundwater had been impacted by activities associated with eight (8) Solid Waste Management Units (SWMUs) identified in the Post-Closure Care Permit. The investigations also assessed a riparian buffer area adjacent to Little Metcalf Branch (Riparian Buffer).

After completion of Phase II RFI activities, two areas were retained for additional evaluation, being SWMU 1 (Former Waste Oil Tank) and the Riparian Buffer (near RFI Phase I RFI sampling location RS-3). SWMU-1 is 0.06 acres, is within PARCEL 1 (Tax Map No. 144-3-1A), and is shown as "Restriction Area I" on the survey plat attached hereto as Exhibit B dated June 17, 2014 and revised November 20, 2014, prepared by James T. Bradley, L.S. entitled, "Plat for Emporia Foundry, Inc. Restriction Areas." The Riparian Buffer is 0.17 acres, is also within PARCEL 1 (Tax Map No. 144-3-1A), and is shown as "Restriction Area II" on the survey plat attached hereto as Exhibit B dated June 17, 2014 and revised November 20, 2014, prepared by James T. Bradley, L.S. entitled, "Plat for Emporia Foundry, Inc. Restriction Areas."

A Risk Exposure and Analysis Modeling System (REAMS) risk analysis was completed for SWMU 1 on January 8, 2013 which recommended closure of the unit with controls (deed restriction eliminating future residential use). The Agency reviewed the evaluation and determined in a memo dated March 5, 2013 that the cumulative risk to the industrial receptor is within the current risk based performance standard.

Additional investigation of the Riparian Buffer identified areas of soil which exceeded the residential and industrial screening levels for lead, 400 mg and 800 mg, respectively. Remedial action conducted in June, 2014 consisted of placing a one foot soil cover on 0.17 acres of lead contaminated soil (concentrations greater than 400 mg/kg) in the Riparian Buffer adjacent to Little Metcalf Branch on the northern property boundary.

The Agency's Corrective Action Objective for Facility soils is to control exposure to the hazardous waste constituents remaining in soils at SWMU 1 (Former Waste Oil Tank), SWMU 3 (hazardous waste landfill), and the Riparian Buffer by requiring compliance with and maintenance of land use restrictions at the Facility. Groundwater is not contaminated above drinking water standards. Thus, no further action is needed to protect human health and the environment in regards to groundwater.

A copy of the Statement of Basis for the Facility issued by the Agency on January 21, 2015 is attached as Exhibit C to this Environmental Covenant. The final remedy selected was that no further actions to remediate soil or groundwater contamination at the Facility were necessary to protect human health or the environment under current and reasonably anticipated future land use. However, the Agency required that certain activity and use limitations be imposed on the Property. These activity and use limitations are imposed by this Environmental Covenant.

3. Activity & Use Limitations.

a. The Property is subject to the following activity and use limitations, which shall run with the land and become binding on Grantor(s) and any successors, assigns, tenants, agents, employees, and other persons under its (their) control, until such time as this covenant may terminate as provided by law:

Associated Tax Parcel	Restriction	Applies to Polygon
<p><u>PARCEL 1:</u> (Tax Parcel 144-3-1A)</p>	<p>1. Restriction Area I on Exhibit B shall not be used for residential purposes or for children’s (under the age of 16) daycare facilities, schools or playground purposes.</p>	<p>Restriction Area I (SWMU-1)</p>
<p><u>PARCEL 2:</u> (Tax Map No. 144-3-1B)</p>	<p>1. The soil cap of the closed Landfill shown on Exhibit A and the vegetated soil cover of the Riparian Buffer shown as Restriction Area II on Exhibit B shall be inspected annually. The inspection shall include examination of the cover integrity. The inspection procedures shall be based on the inspection checklist attached to the Statement of Basis. (The Statement of Basis is attached hereto as Exhibit C.)</p> <p>2. The Landfill and the Riparian Buffer shall not be used for residential purposes or for children’s (under the age of 16) daycare facilities, schools or playground purposes.</p> <p>3. All earth moving activities including excavation, drilling and construction activities that would result in direct exposure to soil or disturbance of the soil on the Landfill, or the Riparian Buffer are prohibited without approval by the Agency of a Materials Management Plan. Any identified disturbances in the landfill cap or soil cover shall be repaired.</p>	<p>Restriction Area II (Riparian Buffer) and Landfill (SWMU-5)</p>

Associated Tax Parcel	Restriction	Applies to Polygon
<u>PARCEL 3 (Tax Parcel 144-A-4).</u>	<p>1. The soil cap of the closed Landfill shown on Exhibit A shall be inspected annually. The inspection shall include examination of the cover integrity. The inspection procedures shall be based on the inspection checklist attached to the Statement of Basis. (The Statement of Basis is attached hereto as Exhibit C.)</p> <p>2. The Landfill shall not be used for residential purposes or for children's (under the age of 16) daycare facilities, schools or playground purposes.</p> <p>3. All earth moving activities including excavation, drilling and construction activities that would result in direct exposure to soil or disturbance of the soil on the Landfill are prohibited without approval by the Agency of a Materials Management Plan. Any identified disturbances in the landfill cap shall be repaired.</p>	Landfill (SWMU-5)

b. Geographic coordinate lists defining the boundary of each activity and use restriction, depicted as a polygon.

Polygon	Description	Associated Tax Parcel
Landfill	Geographic coordinate lists defining the boundary of the Landfill are shown on the survey plat attached hereto as Exhibit A dated October 7, 2014 prepared by Engineering Design Associates entitled "Plat of Survey for Closed Hazardous Waste Landfill, Emporia Foundry, Inc."	<u>PARCEL 2:</u> <u>(Tax Map No. 144-3-1B)</u> <u>PARCEL 3 (Tax Parcel 144-A-4).</u>

Polygon	Description	Associated Tax Parcel
Restriction Area I	Geographic coordinate lists defining the boundary of SWMU-1 (Restriction Area I) are shown on the survey plat attached hereto as Exhibit B dated August 6, 2014, as revised November 20, 2014, prepared by James T. Bradley, L.S. entitled, "Plat for Emporia Foundry, Inc. Restriction Areas."	<u>PARCEL 1:</u> <u>(Tax Parcel 144-3-1A)</u>
Restriction Area II	Geographic coordinate lists defining the boundary of the Riparian Buffer (Restriction Area II) are shown on the survey plat attached hereto as Exhibit B dated August 6, 2014, as revised November 20, 2014, prepared by James T. Bradley, L.S. entitled, "Plat for Emporia Foundry, Inc. Restriction Areas."	<u>PARCEL 2:</u> <u>(Tax Map No. 144-3-1B)</u>

4. Notice of Limitations in Future Conveyances.

Each instrument hereafter conveying any interest in the Property subject to this environmental covenant shall contain a notice of the activity and use limitations set forth in this environmental covenant and shall provide the recorded location of this environmental covenant.

5. Compliance and Use Reporting.

a. By the 1st of March every five (5) years following the date of the recordation of the Covenant, and whenever else requested in writing by the Agency, the then current owner of the applicable property shall submit, to the Agency and any Holder listed in the Acknowledgments below, written documentation stating whether or not the activity and use limitations in this environmental covenant are being observed. This documentation shall be signed by a qualified and certified professional engineer who has inspected and investigated compliance with this environmental covenant.

b. In addition, within one (1) month after any of the following events, the then current owner of the Property shall submit, to the Agency and any Holder listed in the Acknowledgments below, written documentation describing the following: noncompliance with the activity and use limitations in this environmental covenant; transfer of the Property; changes in use of the Property; or filing of applications for building permits for the Property and any proposals for any site work, if such building or proposed site work will affect the contamination on the Property subject to this environmental covenant.

6. Access by the Agency.

In addition to any rights already possessed by the Holder(s) and the Agency, this environmental covenant grants to the Holder(s) and the Agency a right of reasonable access to the Property in connection with implementation, inspection, or enforcement of this environmental covenant.

7. Subordination.

If there is an agreement to subordinate one or more prior interests in the Property to this environmental covenant, then the subordination agreement(s) is/are set forth as follows:

The Property is subject to a Deed of Trust, recorded on January 18, 1995 in Deed Book 211, Page 208 to John V. Cogbill, III, and Thomas L. Newton, Jr., co-Trustees, to secure certain obligations of Emporia Foundry, Inc. to PNC Bank, successor in interest to Midlantic Bank, National Association. The Deed of Trust was subsequently modified by five Deed of Trust Modifications, the most recent of which is the Fifth Deed of Trust Modification recorded as Instrument No. 130001438. The Deed of Trust provides that the holder of the note secured by the Deed of Trust has the power to appoint a Substitute Trustee, and PNC Bank exercised that power by Substitution of Trustee executed on August 20, 2015 appointing Samuel I. White, P.C. as Substitute Trustee. The Substitute Trustee has executed this environmental covenant for the sole purpose of subordinating the Deed of Trust, as modified by the Deed of Trust Modifications, to this environmental covenant and its terms.

8. Recording & Proof & Notification.

a. Within 90 days after the date of the Agency's approval of this UECA environmental covenant, the Grantor shall record, or cause to be recorded, this environmental covenant with the Clerk of the Circuit Court for each locality wherein the Property is located. The Grantor shall likewise record, or cause to be recorded, any amendment, assignment, or termination of this UECA environmental covenant with the applicable Clerk(s) of the Circuit Court within 90 days of their execution. Any UECA environmental covenant, amendment, assignment, or termination recorded outside of these periods shall be invalid and of no force and effect.

b. The Grantor shall send a file-stamped copy of this environmental covenant, and of any amendment, assignment, or termination, to the Holder(s) and the Agency within 60 days of recording. Within that time period, the Grantor also shall send a file-stamped copy to the chief administrative officer of each locality in which the Property is located, any persons who are in possession of the Property who are not the Grantors, any signatories to this covenant not previously mentioned, and any other parties to whom notice is required pursuant to the Uniform Environmental Covenants Act.

9. Termination or Amendment.

This environmental covenant is perpetual and runs with the land unless terminated or amended (including assignment) in accordance with UECA.

GRANTEE and HOLDER

Emporia Foundry, Inc.

By: John Campbell
John Campbell, President

State of New Jersey)
City/County of Hudson)

On this ___ day of August, 2015, before me, the undersigned officer of Emporia Foundry, Inc., personally appeared and acknowledged that he is the person whose name is subscribed to this environmental covenant, and acknowledged that he freely executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

211

Notary Public
CHRIS CAMPBELL
NOTARY PUBLIC OF NEW JERSEY
COMMISSION EXPIRES 6/2/2018

My commission expires: 5/9/19

Registration No. _____

[Signatures continue on next page]

TRUSTEE

Samuel I. White, P.C., Substitute Trustee

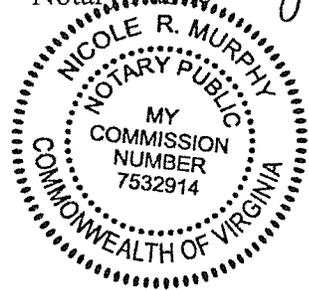
By: [Signature] RONALD S. GUILBERT

Title: Vice President

COMMONWEALTH OF VIRGINIA)
) to wit:
CITY/COUNTY OF Virginia Beach

On this 25th day of August, 2015, before me, the undersigned officer of Samuel I. White, P.C. personally appeared and acknowledged that he or she is the person whose name is subscribed to this environmental covenant, and acknowledged that he or she freely executed the same on behalf of the Substitute Trustee under the above-referenced Deed of Trust that secures certain obligations from Emporia Foundry, Inc. to PNC Bank, National Association.

[Signature]
Notary Public



Registration Number: 7532914

My commission expires: 08-31-16

"Commissioned as Nicole R. Murphy"

AGENCY

APPROVED by the Department of Environmental Quality as required by § 10.1-1238 et seq. of the Code of Virginia.

Date: 9-9-15

By (signature): [Signature]

Name (printed): Justin Wilkins

Title: Lead Protection and Remediation Division Director

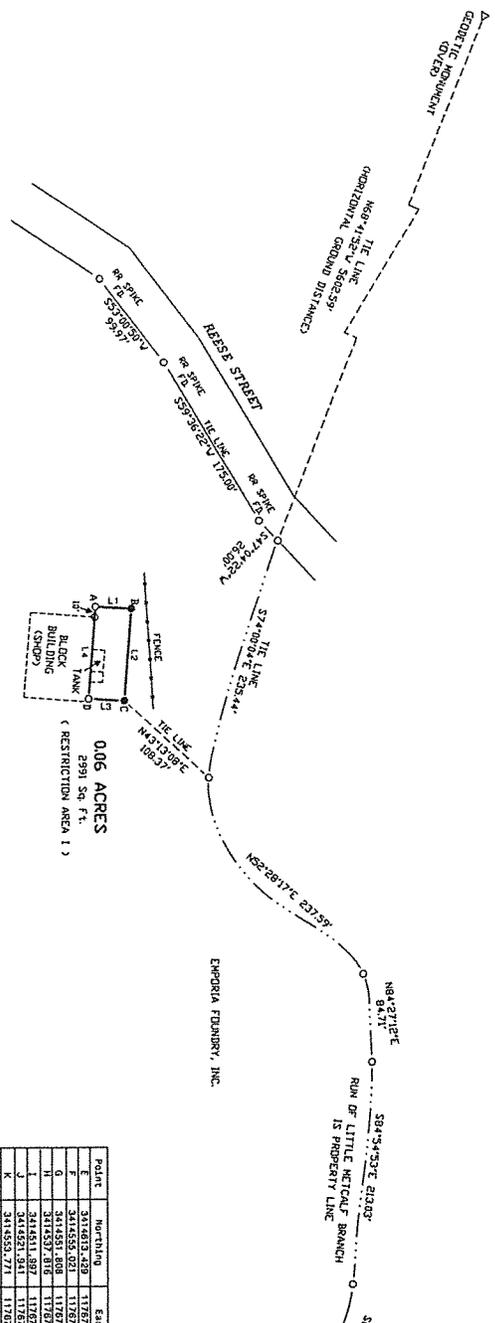
EXHIBIT A

See PB 16 pg. 182

EXHIBIT B

See PB16 pg. 183

PLAT	NORTH	EAST
REG. NO.	341684.432	11781803.007



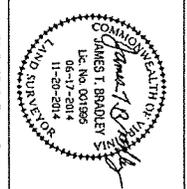
FLUDD NOTE: ZONED X - Areas determined to be outside the 0.22 annual chance Floodplain. COMMUNITY-PANEL NUMBER: 510047 0150 C. EFFECTIVE DATE: JULY 7, 2009

Point	Northing	Easting
A	341471.833	1178242.520
B	341458.235	1178275.529
C	341458.235	1178275.529
D	341471.390	1178273.408

Point	Northing	Easting
E	3414613.429	11782463.892
F	3414553.021	11782598.728
G	341457.818	11782481.907
H	3414611.887	11782480.228
I	3414521.911	11782406.840
J	3414553.771	11782386.808
K	3414601.326	11782413.657
L	3414601.326	11782413.657
M	3414611.155	11782426.078
N	3414611.155	11782426.078

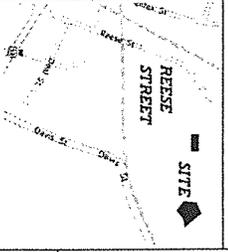
Course	Bearing	Distance
L1	N 01°33'45" E	33.85'
L2	S 89°51'00" W	48.52'
L3	S 03°25'45" W	31.84'
L4	N 85°41'07" W	88.12'

Course	Bearing	Distance
L5	S 27°09'45" E	81.28'
L6	S 47°41'41" E	54.83'
L7	S 75°41'17" W	58.60'
L8	S 57°51'00" W	48.52'
L9	N 59°11'41" W	18.60'
L10	N 59°11'41" W	18.60'
L11	N 10°27'02" E	50.43'
L12	N 70°44'38" E	21.87'
L13	N 80°28'58" E	12.89'
L14	N 82°28'58" E	12.89'



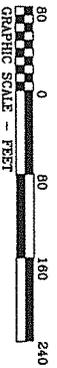
JAMES T. BRADLEY, L.S.
2389 LANE GASTON DRIVE
GASBORO, VA 23097
434-577-8639

VICINITY MAP - NO SCALE



I HEREBY CERTIFY THAT THIS BOUNDARY SURVEY, TO THE BEST OF MY KNOWLEDGE AND BELIEF, COMES IN ACCORDANCE WITH THE PROCEDURES AND STANDARDS ESTABLISHED BY THE VIRGINIA STATE BOARD OF ARCHITECTS, PROFESSIONAL ENGINEERS, LAND SURVEYORS, AND CERTIFIED LANDSCAPE ARCHITECTS.

JAMES T. BRADLEY, L.S., 001995



LEGEND:
 ● REBAR SET
 ○ IRON PIPE FOUND
 --- IRON PIPE FOUND
 --- RIGHT OF WAY
 --- EASEMENT
 --- EASEMENT LIGHT LINE
 --- TAX MAP SECTION

FILE: FOUN0614

PLAT FOR
EMPORIA FOUNDRY, INC.
RESTRICTION AREAS
 CITY OF EMPORIA, VIRGINIA
 SCALE 1" = 80'
 JUNE 17, 2014
 LEGAL REF.: DB, 96 PG. 340
 PLAT REF.: PB, 7 PG. 30
 PB, 3 PG. 8

PLAT REVISED: NOVEMBER 20, 2014
 TO SHOW RESTRICTION AREAS I AND II.
 RESTRICTION AREA I IS A PORTION
 OF TAX MAP SEC. 144-(C3)-1A
 RESTRICTION AREA II IS A PORTION
 OF TAX MAP SEC. 144-(C3)-1B

NOTES:
 1) CITY APPROVAL NEEDED
 2) THIS PLAT IS SUBJECT TO ALL EASEMENTS,
 AGREEMENTS, AND RIGHT-OF-WAYS OF RECORD
 PRIOR TO THE DATE OF THIS PLAT.

EXHIBIT C



VIRGINIA DEPARTMENT OF ENVIRONMENT QUALITY

STATEMENT OF BASIS

**Emporia Foundry
620 Reese Street**

Emporia, Virginia

EPA ID No. VAD023720105

January 21, 2015

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I. INTRODUCTION

1.1. Facility Name

The Virginia Department of Environmental Quality (VDEQ) has prepared this Statement of Basis (SB) for the Emporia Foundry located at 620 Reese Street, Emporia, Virginia 23847 (hereinafter referred to as the Facility).

The Facility is subject to the Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k. The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and waste constituents that have occurred at their property.

Information on the Corrective Action Program can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

VDEQ has prepared this SB in cooperation with the United States Environmental Protection Agency (EPA). VDEQ has reviewed all available Facility data and has determined that no additional characterization or remediation is necessary for the Facility to satisfy its federal RCRA Corrective Action obligations. The components of VDEQ's proposed remedy are being implemented and are enforceable under the Permit entered into by the VDEQ and Emporia Foundry dated October 25, 2005. VDEQ is proposing to incorporate the remedy selection and determination of Corrective Action Complete with Controls in its modification of the Facility's Hazardous Waste Management Post-Closure Permit. Based on its review, in this SB VDEQ is proposing its final remedy for the Facility and providing the opportunity for public comment and review on its proposal and the associated permit modification.

1.2. Proposed Decision

This SB explains VDEQ's proposed decision that no further actions to remediate soil, groundwater, or indoor air contamination are necessary to protect human health and the environment given current and reasonably anticipated future land use. VDEQ's proposed decision requires the Facility to maintain certain property mechanisms known as Institutional Controls (ICs) and Engineering Controls (ECs). The proposed controls are discussed in Section V below. VDEQ's proposed decision represents "Corrective Action Complete with Controls" as described in EPA's "Final Guidance on Completion of Corrective Action Activities at RCRA Facilities", (68 FR 8757, February 25, 2003). A Corrective Action Complete with Controls determination indicates that protection of human health and the environment has been achieved, and will continue as long as the necessary operation and maintenance actions are performed, and the institutional controls are maintained and complied with.

This SB summarizes information that can be found in greater detail in the work plans and reports reviewed by VDEQ and EPA, which can be found in the Administrative Record (AR) included as an attachment to this SB.

1.3. Importance of Public Input

The purpose of this document is to solicit public comment on VDEQ's proposed remedy prior to VDEQ making its final remedy selection for the Facility. The public may participate in the remedy selection process by reviewing this SB and documents contained in the AR in support of VDEQ's proposed decision and submitting written comments to VDEQ during the public comment period. The information presented in this SB can be found in greater detail in the work plans and reports submitted by the Facility to VDEQ and EPA. To gain a more comprehensive understanding of the RCRA activities that have been conducted at the Facility, VDEQ encourages the public to review these documents, which are found in the AR. A copy of the AR is available for public review, in paper or electronic format, from the VDEQ contact person, the address and telephone number of which is provided as an attachment to this Statement of Basis.

When making a determination regarding the selection of a final remedy, VDEQ will consider all written comments received during the comment period (see Section VIII), any oral or written statements received during the public meeting, and requirements of the Virginia Hazardous Waste Management Regulations and 40 CFR Part 124. Each person who has submitted comments will receive a written response from VDEQ. If VDEQ determines that new information or public comments warrant a modification to the proposed decision, VDEQ will modify the proposed decision or select other alternatives based on such new information and/or public comments. VDEQ is proposing to incorporate the remedy selection and determination of Corrective Action Complete with Controls in its modification of the Facility's Hazardous Waste Management Post-Closure Permit. VDEQ anticipates that the final remedy will be implemented initially through the Facility's Permit and subsequently through an environmental covenant pursuant to the Virginia Uniform Environmental Covenants Act (UECA), Title 10.1, Chapter 12.2, Sections 10.1-1238-10.1-1250 of the Code of Virginia (Environmental Covenant). The Facility's Permit will be allowed to expire once the Environmental Covenant has been recorded in the Clerk's Office of the Circuit Court of the City of Emporia, Virginia.

II. FACILITY BACKGROUND

Emporia Foundry is located in an industrial area at 620 Reese Street in Emporia, Virginia. The facility consists of 20.16 acres and lies between multi-family residential areas to the North, and commercial/industrial areas to the South and East. The Facility manufactured gray-iron, municipal castings by mold-casting methods for use by municipal governments and the construction industry. Manufactured castings include manhole covers, manhole cover receptacles, and drain grates. The Facility has ceased operations and is in the process of decommissioning all equipment and closing the Facility.

The foundry site contains a closed hazardous waste landfill, approximately 3.7 acres; the landfill contains RCRA characteristic wastes. The landfill, a regulated unit (identified as SWMU 3 in

the Facility's Hazardous Waste Management Post-Closure Care Permit), is bounded on the north and east by Little Metcalf Branch, on the south by CSX Railroad tracks, and on the west by a drainage ditch (as shown on the attached map). The surface is generally level on the western sections but slopes upward to a steep bank on the eastern end of the landfill.

Between 1965 and 1975, foundry wastes consisting of cupola slag, spent casting sand, and spent steel shot were disposed in the landfill. Between January 1975, and December 1981, cupola baghouse dust was included with other wastes. Between January 1982, and the fall of 1982, foundry waste without cupola baghouse dust was disposed in the landfill, and by December of 1982, the landfill disposal operations ceased. The landfill was certified closed effective February 15, 1984 by the Virginia Department of Waste Management, predecessor of VDEQ.

Closure activities consisted of regrading the landfill, directing surface drainage to an on-site lagoon (later removed) and the application of a clay cap to perimeter slopes.

The Permittee performed post-closure care for the closed landfill identified in Permit Section III.B.1. from February 15, 1984 through February 15, 2014, [thirty (30) years after the date closure was certified].

Emporia Foundry operated under a Closure and Post Closure Care Plan, dated April 19, 1983, until it was issued a Post-Closure Care Permit in 1994 for its closed hazardous waste landfill. The Permit included requirements for initiation of a Groundwater Compliance Monitoring Program because it was determined during detection monitoring (begun in 1985) that there had been a release of constituents from the landfill above background concentrations. However, the concentrations of detected constituents in groundwater at the closed landfill unit boundary did not exceed, and do not now exceed, the GPS specified in the Permit (based on either EPA Maximum Contaminant Level (MCLs) or VDEQ Alternative Concentration Limits (ACLs), or site background).

The facility's Permit, effective October 25, 2005, required Emporia Foundry to perform certain site-wide corrective action investigations, including the submittal of a Phase I RCRA Facility Investigation (RFI) Work Plan to VDEQ and the USEPA for review and comment. The Work Plan was to allow the foundry to propose a plan to assess whether surface water, sediment, soil or groundwater had been impacted by activities associated with eight (8) Solid Waste Management Units (SWMUs) identified in the Post-Closure Care Permit.

III. SUMMARY OF ENVIRONMENTAL HISTORY

To date, the following RCRA CA milestones have been completed at this Facility:

- In December 1991, the site was assigned a medium Corrective Action (CA) priority;
- As part of the first phase in the RCRA Corrective Action process, the Facility submitted to VDEQ for review a Phase I RFI Work Plan. The RFI Work Plan was received by VDEQ on February 3, 2006. The DEQ completed its review of the RFI Work Plan and sent its comments to the Facility on August 18, 2006. Based on the

review of the February 2006 RFI Work Plan and other corresponding reviews, on June 28, 2007, VDEQ requested that the Facility submit a final copy of the RFI Work Plan for approval;

- The Phase I RFI Work Plan, dated February 2006, and revised July 17, 2007, was approved by VDEQ on August 8, 2007;
- The Phase I RFI field activities were conducted in March of 2008. The Phase I RFI Report was submitted on July 31, 2008. VDEQ technical review comments on the Phase I RFI Report were provided to the facility in a VDEQ letter, dated December 18, 2008. Subsequent response to comments, additional comments and revisions to the Phase I RFI Report submittals were made, and VDEQ approved the Final RFI Report in a letter dated December 10, 2010. No further action was recommended for three of the eight SWMUs (SWMU 4, SWMU 5, and SWMU 7). SWMU 3 (the hazardous waste landfill) would continue to be evaluated under the Facility's Post-Closure Care Permit;
- Environmental Indicator status was completed on November 11, 2008 with "Yes" for both human health and groundwater;
- The Phase I RFI included an ecological assessment of Little Metcalf Branch, which bounds the north side of the property. Based on the results of the assessment, VDEQ arranged for additional sampling by the USACE (results reported in the Phase II RFI Report);
- A Phase II RFI Work Plan for multiple SWMUs requiring additional investigation was submitted January 2011, revised June 2011 and October 2011. VDEQ approved the Work Plan on November 17, 2011;
- A Phase II RFI Report was submitted on July 7, 2012 which included sampling activities performed by the United States Army Corps of Engineers (USACE) and the Facility. That Report recommended no further action for SWMU 2, SWMU 6, and SWMU 8. Further study in soil at the riparian buffer sampling location (RS-3) and further assessment of SWMU 1 subsurface soils was recommended;
- After completion of Phase II activities, two areas were retained for additional evaluation, being SWMU 1 (Former Waste Oil Tank) and the Riparian Buffer area (near RFI Phase I RFI sampling location RS-3);
- A Risk Exposure and Analysis Modeling System (REAMS) risk analysis was completed for SWMU 1 on January 8, 2013 which recommended closure of the unit with controls (deed restriction eliminating future residential use). VDEQ reviewed the evaluation and determined in a memo dated March 5, 2013 that the cumulative risk to the industrial receptor is within the current risk based performance standard;

- The Facility submitted a proposal for additional soil sampling in the Riparian Buffer remediation area. VDEQ provided comments to the Work Plan on March 6, 2013; and
- The Facility submitted a Land Use Assumptions Report (LUAR) which designated the industrial user as the appropriate land use scenario. VDEQ approved the LUAR on December 13, 2013.

Riparian Buffer Area

- Facility Investigations of the riparian buffer remediation area identified areas of soil which exceeded the residential and industrial screening levels for lead, 400 mg and 800 mg, respectively. Remedial action consisted of placing a one foot soil cover on 0.17 acres of lead contaminated soil (concentrations greater than 400 mg/kg) adjacent to Metcalf Branch on the northern property boundary;
- The Facility submitted a Work Plan for Riparian Buffer Sampling on March 5, 2013. VDEQ responded with comments on March 6, 2013. A report of Riparian Buffer sampling was submitted on July 17, 2013 which recommended no further action with a deed restriction. VDEQ did not accept the recommendation and required the preparation of a Riparian Buffer Remediation Work Plan;
- The Riparian Buffer Remediation Work Plan was submitted on September 18, 2013. An addendum to the Work Plan was submitted on October 23, 2013. VDEQ provided response to the Work Plan on November 18, 2013 and after comments were addressed, approved the Work Plan in a December 26, 2013 letter;
- The Facility submitted the Riparian Buffer Remediation Report on June 24, 2014; and
- In a letter dated August 28, 2014, VDEQ determined that the RCRA investigation and interim measures implementation at the facility are complete and that the information submitted adequately meets the criteria and standards of the Corrective Action program.

The following table summarizes the SWMUs, constituents of concern (COCs) and the results of the RFIs at the site.

Unit	Description	COCs	RFI Recommendation
SWMU 1 (Restricted Area I on attached map)	Former Waste Oil Tank	VOCs, TPH, Metals, PCBs	Subsurface soils contain concentrations of COCS at levels above residential screening levels. Institutional Controls recommended.
SWMU 2	Baghouses, East Side of Facility	Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	No further action
SWMU 3 ²	Closed Hazardous Waste Industrial Landfill	Arsenic, Barium, Cadmium, Chromium, cobalt, Copper, Lead, Mercury, Thallium, Zinc, Phenol	Assessed under Post-Closure Care Permit Groundwater Monitoring Program
SWMU 4	Waste Sand Pile	Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	No further action
SWMU 5 ¹	Inactive Cupola Dust Treatment Area	Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	No further action
SWMU 6 ¹	Concrete Pad and Machinery	Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	No further action
SWMU 7	Baghouses, South Side of Facility	Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	No further action
SWMU 8	Former Waste Oil Tank	VOCs, TPH, Metals, PCBs	No further action
Little Metcalf Branch (Riparian Buffer Remediation Area – Restricted Area II on attached map)	Bounds north side of the property	Lead	Subsurface soils contain lead above the residential screening level (400 mg/kg). Engineering and Institutional Controls required.
Outfalls			No further action

¹ The investigation and closure of SWMUs 5 and 6 were addressed under an Administrative Order of Consent between the Department and the Permittee dated November 23, 2003. Clean closure for these units was approved by VDEQ on December 12, 2012. The groundwater component of closure was addressed under site-wide corrective action under the Facility's Post-Closure Care permit.

² In December 1993, VDEQ's evaluation of analytical data from the 1993 sampling events indicated that there was evidence of a statistically significant increase in concentrations of both total and dissolved lead (Pb) and cadmium (Cd) downgradient of the closed landfill (SWMU 3). By letter dated December 27, 1993, VDEQ determined there had been a release from the unit and required the Facility to enter compliance monitoring. The compliance monitoring period began August 15, 1994 and terminated on August 26, 2013. The Facility conducted the last groundwater sampling event in December 2013. Records from the past ten sampling events have confirmed constituent concentrations in groundwater have remained below the Facility GPS and no increasing trend is evident.

The post-closure care monitoring period for SWMU 3 ended on February 14, 2014, and termination of post-closure care was approved on August 28, 2014. However, the Facility is still required to complete the site-wide corrective action requirements specified in Module VI of the Permit.

IV. CORRECTIVE ACTION OBJECTIVES

4.1 Soil

VDEQ's Corrective Action Objective for Facility soils is to control exposure to the hazardous waste constituents remaining in soils at SWMU 1 (Former Waste Oil Tank), SWMU 3 (hazardous waste landfill), and the riparian buffer area by requiring compliance with and maintenance of land use restrictions at the Facility.

4.2 Groundwater

Groundwater is not contaminated above drinking water standards. No further action is needed to protect human health and the environment in regards to groundwater.

V. PROPOSED REMEDY

VDEQ's proposed remedy for the Facility consists of the following components:

5.1 Compliance with and Maintenance of Institutional and Engineering Controls (ICs and ECs)

Because contamination will remain in the soils at the Facility, VDEQ's proposed final remedy includes land use restrictions to minimize the potential for human exposure to soil that contains contaminants above levels of concern. The land use restrictions will be implemented through institutional and engineering controls (ICs and ECs). ICs are non-engineered instruments such as administrative and/or legal controls that minimize the potential for human exposure to contamination by limiting land or resource use and inform subsequent purchasers of the environmental conditions at the Facility and of VDEQ's final remedy for the Facility. ECs encompass a variety of engineered and constructed physical barriers (e.g., soil capping, subsurface venting systems, mitigation barriers, fences) to contain and/or prevent exposure to contamination on a property.

VDEQ is proposing the following institutional and engineering controls be implemented and maintained at the Facility:

1. The former Emporia Foundry Hazardous Waste landfill was closed and capped in 1984. The riparian buffer remediation area soil contaminated with lead above the residential screening level (400 mg/kg) was covered by a one (1) foot clean soil cover in 2014. The landfill cap and vegetated soil cover of the riparian buffer remediation area shall be monitored and inspected on an annual basis. Routine monitoring shall include

examination of the cover integrity. The inspection procedures shall be based on the inspection checklist included in the Facility's Permit and attached to this SB.

2. The Facility property containing the hazardous waste landfill, SWMU-1 (designated as Restriction Area I on the attached map), and the riparian buffer area soil cover (designated as Restriction Area II on the attached map) shall not be used for residential purposes or for children's (under the age of 16) daycare facilities, schools or playground purposes.
3. All earth moving activities including excavation, drilling and construction activities that would result in direct exposure to soil or disturbance of the soil on those portions of the Facility property on which the hazardous waste landfill, SWMU-1 (Restriction Area I), and the riparian buffer area soil cover (Restriction Area II) exist shall be prohibited without VDEQ approval of a Materials Management Plan. Any identified disturbances in the landfill cap or soil cover shall be repaired.
4. Compliance with the institutional controls shall be evaluated by the Facility on an annual basis. A report documenting the findings of the evaluation shall be provided to VDEQ no later than March 1 of every year for the prior year.
5. Owner and its successors-in-interest shall provide VDEQ with a "Certified, True and Correct Copy" of any instrument that conveys any interest in the Property.
6. Owner and its successors-in-interest shall allow VDEQ and its authorized agents and representatives, access to the Property to inspect and evaluate the continued effectiveness of the Final Remedy.

A Deed Notice is already in place with the Clerk's Office of the Circuit Court of the City of Emporia, Virginia, Deed Reference, Book 142, Page 580, dated January 12, 1984 identifying the location of the Facility's closed hazardous waste landfill. However, VDEQ anticipates that the boundaries of the hazardous waste landfill (as defined by the survey dated October 7, 2014 prepared by James T. Bailey, L.S. entitled "Plat of Survey for Closed Hazardous Waste Landfill, Emporia Foundry, Inc.") and the boundaries of SWMU-1 (Restriction Area I) and the riparian buffer area soil cover (Restriction Area II) (as defined by the survey plat dated June 17, 2014, as revised November 20, 2014 prepared by James T. Bradley, L.S. entitled, "Plat for Emporia Foundry, Inc. Restriction Areas") will be incorporated into the Permit and an environmental covenant pursuant to the Virginia Uniform Environmental Covenants Act (UECA), Title 10.1, Chapter 12.2, Sections 10.1- 1238 through 10.1-1250 of the Code of Virginia. The covenant will be recorded in the Clerk's Office of the Circuit Court of the City of Emporia, VA.

5.2 No Further Action for Groundwater

VDEQ has determined that concentrations of constituents of interest are below the site-specific Groundwater Protection Standard (MCL, ACL or background concentrations) for SWMU 3 and below the MCLs or applicable risk-based screening levels for the remaining units investigated;

therefore, no further action is required to be protective of human health and the environment in regards to groundwater.

5.3 Implementation

VDEQ is proposing to incorporate the remedy selection and determination of Corrective Action Complete with Controls in its modification of the Facility's Hazardous Waste Management Post-Closure Permit. VDEQ anticipates that the final remedy will be implemented initially through the Facility's Permit and subsequently through an environmental covenant pursuant to the Virginia Uniform Environmental Covenants Act (UECA), Title 10.1, Chapter 12.2, Sections 10.1- 1238 through 10.1-1250 of the Code of Virginia (Environmental Covenant). The Facility's Permit will be allowed to expire once the Environmental Covenant has been recorded in the Clerk's Office of the Circuit Court of the City of Emporia, Virginia.

VI. EVALUATION OF VDEQ'S PROPOSED DECISION

This section provides a description of the criteria VDEQ used to evaluate the proposed remedy consistent with EPA guidance. VDEQ evaluated three remedy threshold criteria as general goals.

6.1 Protect Health and the Environment

The proposed remedy is protective of human health and the environment. Sampling results show that the Facility's groundwater is within an acceptable range for drinking water. With respect to Facility soils, the primary human health and environmental threats posed by contaminated soil at the Facility were related to direct contact with those soils. VDEQ has proposed land use restrictions in order to minimize the potential for human exposure to that contamination.

6.2 Achieve Media Cleanup Objectives

For groundwater, the Facility meets EPA's MCLs or applicable risk-based screening levels. With this remedy decision, VDEQ requires the implementation and maintenance of institutional controls to ensure the Facility soils are used for industrial purposes only and prohibit contact with soil underneath the remediation area's soil cover and the landfill cap.

6.3 Remediating the Source of Releases

In all remedy decisions, VDEQ seeks to eliminate or reduce further releases of hazardous wastes or hazardous constituents that pose a threat to human health and the environment. The Facility's contaminated soil areas are localized and groundwater data has demonstrated that the soils are not a source of release to groundwater.

VII. FINANCIAL ASSURANCE

Since no further investigations or corrective actions are anticipated, financial assurance for corrective action is not required for the Facility. The Facility was released from financial

assurance requirements in a letter dated August 28, 2014 due to the termination of the Post-Closure Care period.

VIII. PUBLIC PARTICIPATION

Interested persons are invited to comment on VDEQ's proposed decision during the comment period for the modification of the Facility's Hazardous Waste Post-Closure Care Permit being requested to incorporate the remedy. The public comment period will last sixty (60) calendar days from the date the notice is published in a local newspaper.

The Administrative Record contains all the information considered by VDEQ for its proposed remedy for the Facility. To receive a copy of the Administrative Record or for additional information regarding the proposed remedy, please contact Mrs. Tara Mason at (804) 698-4218 or tara.mason@deq.virginia.gov.

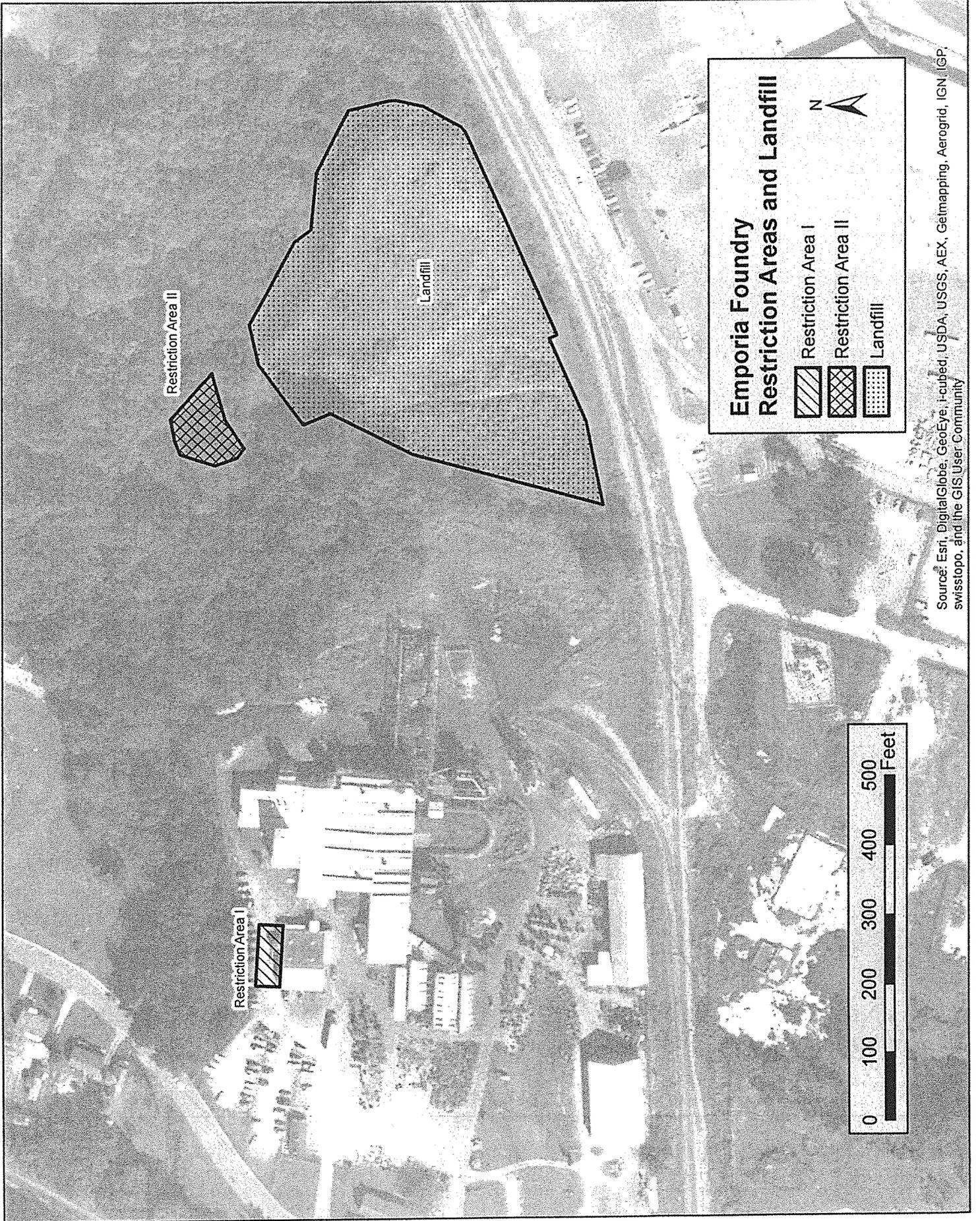
The public comment period will last sixty (60) calendar days from the date the notice is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Ms. Julia King-Collins at the address listed below.

Virginia Department of Environmental Quality
629 East Main Street
P.O. Box 1105
Richmond, VA 23219
Contact: Julia King-Collins
Phone: (804) 698-4237
Email: Julia.King-Collins@deq.virginia.gov

VDEQ will make a final decision after considering all comments, consistent with the applicable RCRA requirements and regulations. If the decision is substantially unchanged from the one in this Statement of Basis, VDEQ will issue a final decision and inform all persons who submitted written comments or requested notice of VDEQ's final determination. If the final decision is significantly different from the one proposed, VDEQ will issue a public notice explaining the new decision and will reopen the comment period.

Administrative Record

Post- Closure Care Permit Emporia Foundry	October 25, 2005
Human Health Environmental Indicator (HHEI) Determination Report	September 25, 2007
Final RFI Report	Revised and Final December 2010
Closure Status Report (Consent Order)	March 24, 2011
Emporia Foundry Inc. Supplemental Sampling Report	October 2011
Phase II Workplan	October 26, 2011
Emporia Foundry Supplemental Sampling Report	October 2011
VDEQ approval of Phase II Sampling and Analysis Plan	November 17, 2011
Closure Report Addendum (Consent Order)	December 2011
VDEQ Closure Plan Addendum Comments	March 12, 2012
Phase II RFI Report and Revisions	July 2012
VDEQ Clean Closure approval	December 12, 2012
SWMU-1 Risk Assessment and Riparian Buffer Sampling	January 8, 2013
Emporia Foundry Phase II RFI – Riparian Buffer	July 17, 2013
Land Use Assumptions Report	October 7, 2013
VDEQ Comments to Land Use Assumptions Report	October 30, 2013
Emporia Response to VDEQ Comments on Land Use Assumptions Report	December 4, 2013
VDEQ Approval of Land Use Assumptions Report	December 13, 2013
Emporia Response to Comments on Riparian Buffer Remediation Work Plan	December 17, 2013
VDEQ approval of Riparian Buffer Remediation Work Plan	December 26, 2013
USACE letter indicating Permit not required (included in June 24, 2014 Riparian Buffer Remediation Report)	April 22, 2014
Riparian Buffer Remediation Report	June 24, 2014
VDEQ approval of Riparian Buffer Remediation	August 28, 2014
Statement of Basis	January 21, 2015



Restriction Area II

Restriction Area I

Landfill

Emporia Foundry Restriction Areas and Landfill

- Restriction Area I
- Restriction Area II
- Landfill

N



Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

EXAMPLE ANNUAL INSPECTION LOG

I. Landfill Cover and Security Fence; and Riparian Buffer Remediation Cover

A. Inspected by (full name): _____

B. Date/Time of Inspection: _____

C. Inspection Observations/Comments:

C.1 Run-Off Control: _____

C.2 Run-On Control: _____

C.3 Water/Wind Erosion: _____

C.4 Rodent/Vector Activity: _____

C.5 Deep Root Vegetation: _____

C.6 Vegetation Stress: _____

C.7 Unauthorized Vegetation: _____

C.8 Authorized Cover Condition: _____

C.9 Subsidence/Cracks: _____

D. Inspection Comments: _____

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