



July 30, 2008

Mr. Randall Peterson, P.E.
Engineering & Operations Manager
Division of Wastewater/Solid Waste
Jamestown Board of Public Utilities
P.O. Box 700
Jamestown, NY 14702-0700

**Subject: Essex/Hope Site
Semi-Annual Self Monitoring Report
January through June 2008
BPU Permit No. 26
URS Project No. 41568140**

Dear Mr. Peterson:

This submittal represents the January through June 2008 monitoring report in accordance with the City of Jamestown Board of Public Utilities Industrial Wastewater Discharge Permit Number 26 for the Essex Specialty Products, Inc facility referenced above. For reporting purposes, Essex Specialty Products, Inc., is classified as a Significant Industrial User subject to Categorical Pretreatment Standards. As such, this report has been developed in accordance with the requirements of 40 CFR 403.12(e).

Specific requirements included in this report as shown on Table 1 are as follows:

- Concentrations of Total Toxic Organics (TTOs) in discharge to POTW as measured monthly. Note: The Baseline Monitoring conducted for the discharge identified volatile organic compounds (VOCs) as approximately 98% of the influent TTO component. Non-volatile components historically were not a major component of chemical usage at the site. Based on these conditions, the permit requires sampling of VOCs to measure TTO concentration.
- pH of discharge to POTW as measured monthly.
- Flow rate of discharge to POTW as measured monthly.
- Estimated daily average and maximum flow rates.

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This Semi-Annual Report contains system influent and effluent data for January through June 2008. During this reporting period, there was one occurrence where discharge water exceeded the permit limits of 2,130 µg/L for total VOCs. Discharge above the permit limits occurred during the month of May 2008 where total VOCs were 3,575 µg/L. This exceedance was due to carbon breakthrough. Notification of this exceedance was provided to the Jamestown BPU verbally via telephone conversation and via letter submittal, both on June 5, 2008. The system was temporarily shut down until the carbon change out on June 26, 2008. No other noncompliance events occurred during this reporting period.

Table 1 summarizes the monthly discharge rates, and the total VOCs and constituents detected in the discharge to the POTW for each month. Discharge flow rates for the reporting period ranged from 16,715 to 121,460 gallons per month over the reporting period. The daily average flow rates shown on Table 1 were estimated based upon the total volume of water discharged per month. Daily maximum flow rates were estimated to be 20 percent greater than daily averages. The supporting Laboratory Certificates of Analysis for the reported concentrations of VOCs are also attached.

We trust that this submittal satisfies our reporting obligation pursuant to 40 CFR 403.12. If you have any questions or require additional information, please contact me at (412) 503-4672.

Sincerely,
URS

A handwritten signature in black ink that reads "Mark Dowiak / rs". The signature is fluid and cursive, with a large "M" and "D".

Mark Dowiak, P.E.
Project Manager

Attachment

cc: Tim King (Dow)
Maurice Moore (NYSDEC)
Valerie Sibeto (URS)

Table 1

January - June 2008
Post Carbon (Effluent) Monitoring Data
Essex/Hope Site
Jamestown, NY

Reporting Requirements for Pre-Treated Discharge (System Effluent to POTW)	Industrial Wastewater Discharge Permit #26 Limits	January	February	March	April	May	June
POTW Discharge Analytical Data							
Total VOCs (µg/L)	2,130 µg/L (TTO)	630	750	1,490	1,790	3,575	157
Detected Compounds	Report	cis-1,2-DCE, Vinyl Chloride	cis-1,2-DCE, Vinyl Chloride	cis-1,2-DCE, Vinyl Chloride	cis-1,2-DCE, Vinyl Chloride	cis-1,2-DCE, TCE, Vinyl Chloride	cis-1,2-DCE, Vinyl Chloride
pH (Standard Units)	5.5 to 10	6.92	6.99	NM	NM	NM	7.00
		6.90	6.86	NM	NM	NM	7.00
		6.82	6.85	NM	NM	NM	7.00
		6.84	6.85	NM	NM	NM	7.00
POTW Discharge Flow Data							
Monthly Total Flow (gallons)	Report	121,460	54,532	113,520	74,133	116,122	16,715
Average Daily Flow (gallons)	Report	3,918	1,880	3,662	2,471	3,746	557
Maximum Daily Flow (gallons)	Report	4,702	2,257	4,394	2,965	4,495	669

Notes:

Jamestown BPU Industrial Wastewater Discharge Permit #26 effective 11/5/07 through 11/4/12.

Maximum Daily Flow is estimated to be 20% greater than Average Daily Flow.

VOCs sample is a laboratory prepared composite of 4 grab samples collected from the pre-treatment system discharge to the POTW at 30 minute intervals.

pH measurements recorded are concurrent with the time of each grab sample. Italicized measurements are approximate.

NM = Not Measured

TTO = Total Toxic Organics

May 2008 Total VOCs reported exceeded Permit Discharge Limit; the system was shut down pending carbon change out and the BPU was notified.

System Carbon was changed out on June 26, 2008.

ATTACHMENTS

LABORATORY ANALYTICAL REPORTS