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February 10, 2011

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
July through December 2010
BPU Permit No. 26
URS Project No. 41568652**

Dear Mr. Peterson:

This submittal represents the July through December 2010 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.

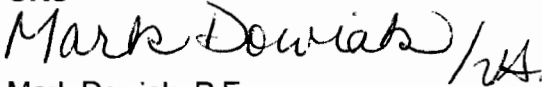
URS Corporation
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Pittsburgh, PA 15205
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www.urscorp.com

This Semi-Annual Report contains system influent and effluent data for July through December 2010. No noncompliance events occurred during this reporting period. The system carbon was changed out on July 13, 2010 and November 22, 2010. 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 90,259 to 163,259 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" followed by a stylized flourish or initials.

Mark Dowiak, P.E.
Project Manager

Attachment

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

Table 1

July - December 2010
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	July	August	September	October	November	December
POTW Discharge Analytical Data							
Total VOCs (µg/L)	2,130 µg/L (TTO)	654	585	1,061	1,491	191	45
Detected Compounds	Report	Acetone, cis-1,2-DCE, Vinyl Chloride	cis-1,2-DCE, Vinyl Chloride	cis-1,2-DCE, Vinyl Chloride	cis-1,2-DCE, Vinyl Chloride	Acetone, cis-1,2-DCE, Vinyl Chloride	cis-1,2-DCE, Vinyl Chloride
pH (Standard Units)	5.5 to 10	6.80	7.30	7.20	7.40	7.30	7.00
		6.80	7.30	7.20	7.40	7.30	7.00
		6.80	7.00	7.40	7.40	7.30	7.00
		6.80	7.00	7.40	7.40	7.30	7.00
POTW Discharge Flow Data							
Monthly Total Flow (gallons)	Report	152,945	163,011	163,259	139,191	90,259	141,457
Average Daily Flow (gallons)	Report	4,934	5,258	5,442	4,490	3,009	4,563
Maximum Daily Flow (gallons)	Report	5,920	6,310	6,530	5,388	3,610	5,476

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.

TTO = Total Toxic Organics

System Carbon was changed out on March 23, 2010, July 13, 2010, and November 22, 2010.