



February 27, 2012

Mr. Michael V. Saar, P.E.
Water Resources 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 2011
BPU Permit No. 26
URS Project No. 41569181**

Dear Mr. Saar:

This submittal represents the July through December 2011 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 July through December 2011. The system carbon was changed out on July 28, 2011. There were two (2) noncompliance events during this reporting period. Discharge permit limits were exceeded in July 2011 and August 2011, at concentrations of 3,818 $\mu\text{g/L}$ and 2,454 $\mu\text{g/L}$, respectively. Following each event, the Jamestown BPU was notified both verbally and via letter submittal. See the attached Notice of Non-Compliance letters for additional information. Table 1 summarizes the monthly discharge rates, and the total VOCs and constituents detected in the discharge to the POTW for each month. 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



Mark Dowiak, P.E.
Project Manager

Attachment

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

Table 1
July - December 2011
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) | 3,818 | 2,454 | 903 | 27 | 623 | 386 |
| Detected Compounds | Report | Acetone, cis-1,2-DCE, Vinyl Chloride | Acetone, cis-1,2-DCE, Vinyl Chloride | Acetone, 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 | 7.00 | 7.00 | 7.00 | 7.00 | 7.00 | 7.00 |
| | | 7.00 | 7.00 | 7.00 | 7.00 | 7.00 | 7.00 |
| | | 7.00 | 7.00 | 7.00 | 7.00 | 7.00 | 7.00 |
| | | 7.00 | 7.00 | 7.00 | 7.00 | 7.00 | 7.00 |
| POTW Discharge Flow Data | | | | | | | |
| Monthly Total Flow (gallons) | Report | 133,173 | 86,228 | 26,534 | 167,425 | 177,450 | 184,060 |
| Average Daily Flow (gallons) | Report | 4,296 | 2,782 | 884 | 5,401 | 5,915 | 5,937 |
| Maximum Daily Flow (gallons) | Report | 5,155 | 3,338 | 1,061 | 6,481 | 7,098 | 7,125 |

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 June 7, 2011 and July 28, 2011.