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January 25, 2011

Reference No. 005020

Mr. Brian Sadowski Project Manager New York State Department of Environmental Conservation 270 Michigan Avenue Buffalo, NY 14203-2999

Dear Mr. Sadowski:

Re: Periodic Review Report for 2010 Jamestown Allenco Site (formerly Dowcraft), Falconer, New York Site No. 907020

Pursuant to the New York State Department of Environmental Conservation letter dated November 15, 2010, this 2010 Site Management Periodic Review Report has been prepared for the Jamestown Allenco Facility (formerly Dowcraft South Dow Street Site) located at 65 South Dow Street in Falconer, New York. This Periodic Review Report also fulfils the Annual Reporting requirements specified in the NYSDEC approved "Remedial Design/Remedial Action Work Plan and Operation, Maintenance, and Monitoring Work Plan" which was last updated in June 2010.

INTRODUCTION

The former Dowcraft property, now owned by Jamestown Container Corporation, is located at 65 South Dow Street, Falconer, New York. The location of the Site is shown on Figure 1. The former Dowcraft property covered approximately 2.2 acres.

The property is bounded to the north and east by the Jamestown Container Corporation property and to the south by property owned by Norfolk Southern Railroad. South Dow Street is directly west of the property. The Chadakoin River borders the Jamestown Container Corporation property on the north. A Site plan is shown on Figure 2.

The former South Dow Street Dowcraft Corporation facility in Falconer, New York has been demolished and the property sold to Jamestown Container Corporation. Jamestown Allenco, Inc, (a successor of the Dowcraft Corporation) has retained the responsibility of completing the remedial work at the Site. The remedial work consists of efforts to minimize the impact of trichloroethene (TCE) which was released on the Site as a result of a degreaser unit. The groundwater beneath the Site has been impacted by the TCE (and its breakdown components)





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at concentrations that exceed the New York State Department of Environmental Conservation (NYSDEC) criteria.

This Periodic Review Report presents the information from the remedial efforts conducted in 2010.

All of the activities performed at the Site have been completed in accordance with the terms specified in the "Remedial Design/Remedial Action Work Plan and Operation, Maintenance, and Monitoring Work Plan" developed by CRA in November 2005, and as amended in 2008 and 2010.

SITE OVERVIEW

The Site's groundwater has been impacted by TCE which was historically released from a vapor degreaser located near the center of the Site. Groundwater is found at a depth of approximately 10 feet below the ground level and flows in a northerly direction, discharging into the Chadakoin River. The soil through which the groundwater flows is primarily a sand and gravel unit that contains some silt.

The Chemicals of Concern that have been identified for the Site are:

Trichloroethylene (TCE) Cis-1,2-Dichloroethene (cis-DCE) Vinyl Chloride

The remediation goals selected for this Site are:

- Prevent exposure of human receptors to contaminated groundwater in the sand and gravel unit under the Site.
- Prevent or mitigate, to the maximum extent practicable, Chemicals of Concern migration via groundwater so that releases from the underlying sand and gravel unit to the Chadakoin River do not exceed applicable Standards, Criteria, and Guidance Values.

Interim Remedial Measures were initiated in the 1990s using pump and treat technologies to address the impacted groundwater. These measures were later replaced with an in-situ chemical oxidation remedy that was also initially implemented as an Interim Remedial Measure and subsequently accepted in the March 2003 Record of Decision as the Final Remedial Measure.



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In February 2008, a recommendation was made by Conestoga-Rovers & Associates (in the 2007 Annual Report) to switch from potassium permanganate to soy lactate as the injection medium to attempt to eliminate the remaining TCE. The soy lactate creates anaerobic conditions within the groundwater formation, thereby accelerating the rate of TCE degradation. Approval of this approach was provided by the NYSDEC on March 3, 2008.

EVALUATE REMEDY PERFORMANCE, EFFECTIVENESS, AND PROTECTIVENESS

As evidenced by the surface water quality of the Chadakoin River located adjacent to the Jamestown Allenco Facility, there have been no releases of TCE or its breakdown components into the River at concentrations that would have an adverse impact on water quality. In fact, in all of the samples collected from the River, there has never been a detected concentration of TCE or any of its breakdown components except for a one time estimated detection of cis-DCE at 1 parts per billion (ppb) on one occasion. All other measurements have been non detect. Since the Chadakoin River is the receptor of Site groundwater, the implemented remedy has been successful in terms of protecting human health and the environment.

Each of the progressive phases of the remediation has been effective in removing, destroying, or biodegrading the TCE and its breakdown components. The initial pump and treat remedy removed more than 2,500 pounds of these compounds and treated them using an air stripper / carbon system. The potassium permanganate remedy chemically oxidized considerable amounts of these compounds in-situ as evidenced by the substantial reductions in the concentrations of these compounds following the applications. However, some rebound of the concentrations did occur. The most recent soy lactate injections have also been successful in creating the conditions amenable for TCE degradation as evidenced by the reduction in TCE concentrations and the increases in concentrations of its breakdown components, most notably at the immediate source area (PW-3R). As an additional line of evidence to assess the effectiveness of the soy lactate injections, groundwater samples collected during the October 2010 monitoring event were analyzed for ethene and ethane concentrations as well as for VOCs. The results show that considerable degradation is occurring as evidenced by the noted concentrations of ethene (45 to 7,100 ppb) and ethane (15 to 140 ppb) in the main source area wells (ESI-2, PW-2, and PW-3R).

Based upon the October 2010 data, the concentrations of TCE have been considerably reduced from the concentrations that existed prior to the soy lactate injections but remain above the 1,000 ppb threshold set forth in the Work Plan as the concentration below which no additional injections need occur. The concentrations at ESI-2 and PW-2, which historically were above 1,000 ppb of TCE, have now been reduced to concentrations below 1,000 ppb. In fact, the



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concentrations of TCE in the past two years have remained below 180 ppb at these two formerly elevated concentration locations.

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The groundwater chemical concentrations obtained from the October 2010 sampling event are provided in Table 1. The concentration data for TCE and its two primary degradation components (cis-DCE and vinyl chloride) are also shown on Figures 3, 4, and 5, respectively.

MONITORING PLAN COMPLIANCE

The monitoring plan developed for the Jamestown Allenco Facility includes both chemical and hydraulic monitoring of groundwater and the Chadakoin River. In compliance with the Work Plan, and as recommended in the 2009 Annual Report, the monitoring was conducted on an annual basis for 2010. The monitoring was performed on October 4 and, as previously noted, the chemical data are provided in Table 1 and are summarized on Figures 3, 4, and 5. Eleven monitoring wells were sampled plus the Chadakoin River. Each well was sampled for VOCs, ethene, and ethane. The samples were placed in a cooler with ice and shipped to H2M Laboratories Inc. in Melville NY on October 4, 2010 following appropriate chain-of custody procedures.

At the time that the groundwater samples were collected, measurements of the groundwater and surface water elevations were also collected. The results of the hydraulic monitoring are presented on Figure 6. The hydraulic monitoring confirms that the groundwater continues to flow in a northerly direction toward the Chadakoin River, consistent with all previous monitoring events.

OPERATION & MAINTENANCE PLAN COMPLIANCE

In accordance with the Work Plan, the only maintenance items are those associated with the monitoring wells. Although some improvements to the monitoring wells could be made, the wells still function as necessary and continue to be used.

INSTITUTIONAL CONTROL & ENGINEERING CONTROL COMPLIANCE

The only institutional control required is the prohibition of use of groundwater in the impacted area being used as a source of potable or process water. A signed certification that groundwater is not being used is provided by the property owner (see Attachment 1).



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As specified under the Engineering Control provision in the Work Plan, any future development on the Site will include provisions for soil gas controls, or an assessment demonstrating that such controls are not needed.

As required, the Site Management Periodic Review Report Notice – Institutional and Engineering Controls Certificate Form has been completed and a copy is provided in Attachment 2.

OVERALL CONCLUSIONS AND RECOMMENDATIONS

Based upon the sampling performed during this reporting period, the following conclusions have been formulated:

- All of the required work was completed and is reported herein.
- The remedial activities performed at the Site have prevented any adverse risk to human health and the environment.
- The sampling of the Chadakoin River continues to demonstrate that there is no impact of the Site groundwater conditions on the surface water quality in the River.
- The groundwater flow configuration beneath the Site is stable and remains consistent with historically identified trends. The groundwater flow is to the north and discharges into the Chadakoin River.
- The injections of potassium permanganate have successfully chemically oxidized a considerable amount of TCE and its breakdown components, particularly in the immediate vicinity of the former TCE degreaser unit.
- The 2008 injection of soy lactate has resulted in a significant reduction in the concentrations
 of TCE in the central source area. As expected, the reduction in TCE concentrations is
 matched with increases in the concentrations of TCE degradation products (cis-DCE and
 vinyl chloride). These data demonstrate that the soy lactate injections have created an
 anaerobic treatment zone that is effectively remediating the groundwater plume.
- TCE concentrations that exceed 1,000 ppb are now only present at one well (PW-3R) and even in that well, one of the two sampling rounds performed in 2009 showed that the TCE concentration had been reduced to non-detect levels for a period of time.

Based upon these conclusions, it is recommended that another round of soy lactate injections be performed, primarily in the vicinity of well PW-3R. Similar to the injections performed in 2008, it is proposed that 840 pounds of soy lactate be injected as a dilute solution mixed at a 10:1 ratio (by weight) with potable water. The soy lactate comes with a vitamin B-12 supplement to help



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stimulate microbial action. It is further recommended that the soy lactate be also supplemented with 10 to 20 pounds of nutrients (ammonium hydroxide and sodium phosphate) to provide the nitrogen and phosphorus necessary to support biodegradation. The locations into which the soy lactate will be injected and the recommended amounts are as follows:

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•	PW-2	170 pounds
•	PW-3R	590 pounds
•	Injection wells surrounding PW-3R	40 pounds
•	ESI-2	40 pounds

The solution will be injected into the wells using a small submersible pump at rates of approximately 5 gallons per minute. Well PW-3R will only accept the solution at 0.5 gallons per minute so a sanitary well seal cap will be installed and gravity will be used to inject the solution into this well.

After injecting the last batch of soy lactate, approximately 50 to 70 gallons of potable water will be used to clean out the tanks and hoses. This water will be added to PW-3R. Approximately 25 gallons of clean chase water will be added to the injection wells after the soy lactate injections to push the soy lactate solution into the groundwater and to flush the injection well casings.

Due to the limited financial resources of Jamestown Allenco, it is requested that the NYSDEC purchase and supply the injection materials. Jamestown Allenco will provide the labor and equipment necessary for the injections. It is anticipated that the injection will occur in the spring or summer of 2011.

In the second quarter of 2012, a set of groundwater samples will be collected from the following wells and analyzed for VOCs:

PW-1	ESI-2
PW-2	ESI-10
PW-3R	ESI-11
	ESI-12

Again, due to limited financial resources, it is requested that the NYSDEC make the arrangements for and provide the analytical services. Jamestown Allenco will provide the labor and equipment necessary for the sampling.



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Should there be any questions, please do not hesitate to contact me at 519-884-0510 or Dana Lundberg - of Lundberg & Gustafson LLP at 716-664-2346.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

ames Ky

James K. Kay

JKK/sc/1 Encl. Attachments, Table 1, Figures

cc: Linda Ross Dana Lundberg Harry Nicholson Dave Tyran



05020-00(SADO001)GN-WA001 DEC 21/2010



05020-00(SADO001)GN-WA002 DEC 21/2010



05020-00(SADO001)GN-WA003 DEC 21/2010



05020-00(SADO001)GN-WA004 DEC 21/2010



05020-00(SADO001)GN-WA005 DEC 21/2010





05020-00(SADO001)GN-WA006 DEC 21/2010

Image Date ImageD		Location ID: Sample Name:	Creek WG-5020-100410-013	ESI-1 WG-5020-100410-001	ESI-2 WG-5020-100410-006	ESI-3 WG-5020-100410-004	ESI-3 WG-5020-100410-005	ESI-7 WG-5020-100410-003	ESI-10 WG-5020-100410-009
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Methyl cyclohexane $\mu g/L$ 10 U 10	Methyl acetate	ug/L	10 U						
Methyl tert butyl ether (MTBE) $\mu g/L$ 10 U10 U10 U10 U10 U10 U	Methyl cyclohexane	ug/L	10 U						
	Methyl tert butyl ether (MTBE)	μg/L	10 U						

I	ocation ID:	Creek	ESI-1	ESI-2	ESI-3	ESI-3	ESI-7	ESI-10
Sa	mple Name:	WG-5020-100410-013	WG-5020-100410-001	WG-5020-100410-006	WG-5020-100410-004	WG-5020-100410-005	WG-5020-100410-003	WG-5020-100410-009
Si	ample Date:	10/4/2010	10/4/2010	10/4/2010	10/4/2010	10/4/2010	10/4/2010	10/4/2010
						Duplicate		
Parameters	Units							
Volatile Organic Compounds (Cont'd.)								
Methylene chloride	μg/L	10 U						
Styrene	μg/L	10 U						
Tetrachloroethene	μg/L	10 U						
Toluene	μg/L	10 U						
trans-1,2-Dichloroethene	μg/L	10 U	10 U	3 J	10 U	10 U	10 U	10 U
trans-1,3-Dichloropropene	μg/L	10 U						
Trichloroethene	μg/L	10 U	5 J	120	9 J	9 J	58	73
Trichlorofluoromethane (CFC-11)	μg/L	10 U						
Trifluorotrichloroethane (Freon 113)	μg/L	10 U						
Vinyl chloride	μg/L	10 U	10 U	260	10 U	10 U	10 U	73
Xylenes (total)	μg/L	10 U						
Dissolved Gas								
Ethane	μg/L	1 U	1 U	140	1 U	1 U	1 U	1 U
Ethene	μg/L	1 U	1 U	140	1 U	1 U	1 U	0.87 J

	Location ID: Sample Name: Sample Date:	ESI-11 WG-5020-100410-010 10/4/2010	ESI-12 WG-5020-100410-008 10/4/2010	ESI-13R WG-5020-100410-002 10/4/2010	PW-1 WG-5020-100410-007 10/4/2010	PW-2 WG-5020-100410-012 10/4/2010	PW-3R WG-5020-100410-011 10/4/2010
Parameters	Units						
Volatile Organic Compounds							
1,1,1-Trichloroethane	μg/L	10 U	10 U	10 U	10 U	10 U	1 J
1,1,2,2-Tetrachloroethane	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
1,1,2-Trichloroethane	μg/L	10 U	10 U	10 U	10 U	10 U	3 J
1,1-Dichloroethane	μg/L	10 U	10 U	10 U	10 U	10 U	10
1,1-Dichloroethene	μg/L	10 U	10 U	10 U	10 U	10 U	76
1,2,4-Trichlorobenzene	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
1,2-Dibromo-3-chloropropane (DBCP)	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
1,2-Dibromoethane (Ethylene dibromide)	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
1,2-Dichlorobenzene	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
1,2-Dichloroethane	μg/L	10 U	10 U	10 U	10 U	10 U	2 J
1,2-Dichloropropane	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
1,3-Dichlorobenzene	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
1,4-Dichlorobenzene	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
2-Butanone (Methyl ethyl ketone) (MEK)	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
2-Hexanone	μg/L	10 U	10 U	10 U	10 U	10 U	26
4-Methyl-2-pentanone (Methyl isobutyl ketone) (MIBK)	μg/L	10 U	10 U	10 U	10 U	10 U	3 J
Acetone	μg/L	10 U	10 U	10 U	10 U	10 U	30
Benzene	μg/L	10 U	10 U	10 U	10 U	10 U	1 J
Bromodichloromethane	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Bromoform	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Bromomethane (Methyl bromide)	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Carbon disulfide	μg/L	10 U	10 U	10 U	10 U	10 U	6 J
Carbon tetrachloride	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Chlorobenzene	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Chloroethane	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Chloroform (Trichloromethane)	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Chloromethane (Methyl chloride)	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
cis-1,2-Dichloroethene	μg/L	84	45	19	83	230	38000
cis-1,3-Dichloropropene	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Cyclohexane	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Dibromochloromethane	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Dichlorodifluoromethane (CFC-12)	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Ethylbenzene	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Isopropyl benzene	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Methyl acetate	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Methyl cyclohexane	μg/L	10 U	10 U	10 U	10 U	10 U	10 U
Methyl tert butyl ether (MTBE)	μg/L	10 U	10 U	10 U	10 U	10 U	10 U

	Location ID:	ESI-11	ESI-12	ESI-13R	PW-1	PW-2	PW-3R
	Sample Name:	WG-5020-100410-010	WG-5020-100410-008	WG-5020-100410-002	WG-5020-100410-007	WG-5020-100410-012	WG-5020-100410-011
	Sample Date:	10/4/2010	10/4/2010	10/4/2010	10/4/2010	10/4/2010	10/4/2010
Parameters	Units						
Volatile Organic Compounds (Cont'd.)							
Methylene chloride	μg/L	10 U					
Styrene	μg/L	10 U					
Tetrachloroethene	μg/L	10 U	5 J				
Toluene	μg/L	10 U	11				
trans-1,2-Dichloroethene	μg/L	10 U	10 U	10 U	10 U	1 J	170
trans-1,3-Dichloropropene	μg/L	10 U					
Trichloroethene	μg/L	12	74	18	74	180 J	27000
Trichlorofluoromethane (CFC-11)	μg/L	10 U					
Trifluorotrichloroethane (Freon 113)	μg/L	10 U					
Vinyl chloride	μg/L	64	2 J	10 U	15	140	9700
Xylenes (total)	μg/L	10 U	2 J				
Dissolved Gas							
Ethane	μg/L	3.8	1 U	1 U	1 U	54	15
Ethene	µg/L	2.7	1 U	1 U	1 U	45	7100 J

ATTACHMENT 1

GROUNDWATER USE CERTIFICATION

Jamestown Container Realty Inc.

14 Deming Drive Falconer, New York 14733

December 2, 2010

Re: Site Name: Dowcraft, South Dow Street Site No.: 907020 Site Address: 65 South Dow Street, Falconer, NY 14733

To Whom it May Concern:

This confirms that the above referenced property currently is owned by Jamestown Container Realty Inc. As the property owner, Jamestown Container Realty Inc. hereby certifies that it is not using any ground water drawn from the property.

If you need anything further, please advise.

Sincerely yours

JAMESTOWN CONTAINER REALTY INC.

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Joseph R. Palmeri, Vice President

ATTACHMENT 2

INSTITUTIONAL AND ENGINEERING CONTROLS CERTIFICATION FORM



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Enclosure 1 NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION Site Management Periodic Review Report Notice Institutional and Engineering Controls Certification Form



Site Details Site No. 907020	Box 1	
Site Name Dowcraft, South Dow Street		
Site Address: 65 South Dow Street Zip Code: 14733 City/Town: Falconer County: Chautauqua Site Acreage: 2.2		
Reporting Period: November 06, 2008 to December 31, 2010		· .
	YES	NO
1. Is the information above correct?	¥.	
If NO, include handwritten above or on a separate sheet.		
 Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period? 		
 Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))? 		
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		iz ·
If you answered YES to questions 2 thru 4, include documentation or evidenc that documentation has been previously submitted with this certification forn	e n.	
5. Is the site currently undergoing development?		
	Box 2	
	YES	NO
Is the current site use consistent with the use(s) listed below? Industrial	$ at {4}$	
7. Are all ICs/ECs in place and functioning as designed?		
IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below DO NOT COMPLETE THE REST OF THIS FORM.	and	•
IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below DO NOT COMPLETE THE REST OF THIS FORM. A Corrective Measures Work Plan must be submitted along with this form to address	and these iss	ues.
IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below DO NOT COMPLETE THE REST OF THIS FORM. A Corrective Measures Work Plan must be submitted along with this form to address	and these iss	ues.

SITE NO. 907020		Box 3
Description o	f Institutional Controls	
Parcel	<u>Owner</u>	Institutional Control
104-12-2	Bruce Janowski, Jamestov	vn Container Real
	· · · · · · · · · · · · · · · · · · ·	Ground Water Use Restriction
		Landuse Restriction
	·	Monitoring Plan
		O&M Plan
		Box 4

Description of Engineering Controls

None Required

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Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

2.

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the 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 compete.

YES NO

NO

Box 5

If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

(a) the Institutional Control and/or 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.

e) Not Applicable

IF THE ANSWER TO QUESTION 21S NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM.

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. 907020 Box 6 SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE I certify that all information and statements in Boxes 2 and/or 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. print business address print name am certifying as (Owner or Remedial Party) for the Site named in the Site Details Section of this form. Signature of Owner or Remedial Party Rendering Certification Date