



2021 Annual Report

Prepared for:

G.W Lisk Company, Inc.

2 South Street, Village of Clifton

Springs Ontario County, New York

G.W. Lisk Facility

2 South Street, Village of Clifton Springs, Ontario County, New York

NYSDEC Site Number C835026

15 April 2022

Project No.: 0587557

Signature Page

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2021 Annual Report

G.W.Lisk, Inc. Facility



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NYS Professional Engineer



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Acronyms and Abbreviations

Name	Description
BCP	Brownfield Cleanup Program
EC	Engineering Control
ERM	ERM Consulting & Engineering, Inc.
HVAC	Heating, Ventilation, and Air Conditioning
IA	Indoor Air
IC	Institutional Control
ISMP	Interim Site Management Plan
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
O&M	Operations and Maintenance
OM&M	Operations, Maintenance, and Monitoring
RAO	Remedial Action Objective
SCOs	Soil Cleanup Objectives
TCE	Trichloroethene
TOGS	Technical and Operational Guidance Series
VOC	Volatile Organic Compound

CERTIFICATIONS

I, STEPHEN A. MIRABELLO, am currently a registered professional engineer licensed by the State of New York, and had primary direct responsibility for the preparation of this Annual Report.

For each institutional or engineering control identified for the site, I certify that all of the following statements are true:

- (a) the institutional control and/or engineering control employed at this site is unchanged from the date the control was put in place, or last approved by DER;
- (b) The inspection of the site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under my direction;
- (c) The institutional control and/or engineering control employed at this site is unchanged from the date the control was put in place, or last approved by the Department;
- (d) Nothing has occurred that would impair the ability of the control to protect the public health and environment;
- (e) Nothing has occurred that would constitute a violation or failure to comply with any site management plan for this control;
- (f) 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;
- (g) If a financial assurance mechanism is required under the oversight document for the site, the mechanism remains valid and sufficient for the intended purpose under the document;
- (h) Use of the site is compliant with the Environmental Easement;
- (i) The EC systems are performing as designed and are effective;
- (j) 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;
- (k) The information presented in this report is accurate and complete

I certify that all information and statements in this certification form 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. I, Stephen A Mirabello, of 5784 Widewaters Parkway, Syracuse, New York, am certifying as the Owner's Designated Site Representative and I have been authorized and designated by Owner to sign this certification for the site.



4/15/22

NYS Professional Engineer #

Date

Signature

EXECUTIVE SUMMARY

G.W. Lisk entered into an Order on Consent and Administrative Settlement with the New York State Department of Environmental Conservation (NYSDEC) dated 27 May 2015 (Index Number R8-0852-15-04) to perform an SC of environmental media at the Site. Subsequently G.W. Lisk entered into the NYSDEC Brownfield Cleanup Program (BCP) on January 23, 2019 to investigate and remediate the Site and is assigned BCP Site Number C835026.

Remaining contamination is being addressed by Institutional Controls (ICs) and Engineering Controls (ECs) and pursuant to Soil Vapor Intrusion (SVI) Interim Site Management Plan (ISMP).

The ISMP requires the maintenance of the ECs, as well as the filing of an Annual Report to document that the ICs and ECs remain in place and continue to be effective.

A summary of the results of the periodic monitoring described in this report are as follows:

- The annual inspection of the main building confirmed that the integrity of the Site cover system remains intact.
- Based upon the integrity of the cover system, additional samples of the sub-slab or indoor air were not recommended.
- Institutional controls remain in place.
- The property owner is conducting maintenance of the site cover system as required by the ISMP.

Additionally, inspections and a remedial action was performed for the Hundreds Building at the same facility during this reporting period. A summary of the results of the respective inspection and remedial action, including a Construction Completion Report and an Amended ISMP are provided under separate cover.

In summary, the ICs and ECs remain in place and effective. Semi-annual monitoring of the ECs shows that the system is operating as designed and in a consistent manner. The submission of the next Annual Report will be in April 2023.

1. SITE OVERVIEW

This Annual Report is required per the Soil Vapor Intrusion (SVI) Interim Site Management Plan (ISMP) and memorializes the associated maintenance, inspection, and remediation activities performed from 1 January 2021 through 31 December 2021 by ERM Consulting & Engineering, Inc. (ERM).

G.W. Lisk entered into an Order on Consent and Administrative Settlement with the New York State Department of Environmental Conservation (NYSDEC) dated 27 May 2015 (Index Number R8-0852-15-04) to perform an SC of environmental media at the Site. Subsequently G.W. Lisk entered into the NYSDEC Brownfield Cleanup Program (BCP) on January 23, 2019 to investigate and remediate the Site and is assigned BCP Site Number C835026.

The Site is located in the south-central portion of the Village of Clifton Springs in Ontario County, New York. Figure 1 shows the location of the Site and adjacent areas. Figure 2 shows the layout and land use of the Site including the parcel boundary and surrounding areas.

G.W. Lisk successfully completed the interim remedial measures described in NYSDEC approved workplans including:

- Sealing of cracks, holes, joints, and gaps throughout the floor slab;
- Sealing of vertical subgrade walls and floors within the elevator shaft;
- Increasing air-flow through the facility;
- Replacement of original manufacturing products with those that contain no or lower volatile organic compounds (VOC) content as applicable
- Development and implementation of an ISMP for long-term management of remaining contamination, which includes plans for: (1) Institutional Controls (ICs) and Engineering Controls (ECs), (2) monitoring, (3) operation and maintenance and (4) reporting.

Notwithstanding the completion of remedial work, some subsurface contamination remains at the Site. That remaining contamination is being addressed by ECs pursuant to an ISMP, which remains in effect. The ISMP obligations are also reflected in several ICs, including maintenance, monitoring, and inspection of the remedy.

The ISMP requires the maintenance of the ECs, as well as the filing of an Annual Report to document that the ICs and ECs remain in place and continue to be effective

2. EVALUATION OF REMEDY PERFORMANCE, EFFECTIVENESS, AND PROTECTIVENESS

The following remedial action objectives (RAOs) were achieved by the Soil Vapor Intrusion remedial activities.

Soil

- *Prevent inhalation exposure to contaminants volatilizing from soil*

The slab and elevator walls in identified buildings were sealed to the extent practical and facility airflow was increased. As facility operations adjust, newly accessible areas are sealed as part of regular maintenance. The slab is inspected at least annually.

Additionally, there are facility procedures to notify facility staff to contaminants under the slab and to provide protection in the event the sub-surface soil must be exposed.

Soil Vapor

- *Mitigate impacts to public health resulting from existing, or the potential for, soil vapor intrusion into buildings at a site.*

Similarly, for soil RAOs, the slab and elevator walls in identified buildings were sealed to the extent practical. As facility operations adjust, newly accessible areas are sealed as part of regular maintenance. The slab is inspected at least annually.

Additionally, there are facility procedures to notify facility staff to contaminants under the slab and to provide protection in the event the sub-surface soil must be exposed. The procedures are provided in the ISMP.

3. INSTITUTIONAL CONTROLS AND ENGINEERING CONTROLS COMPLIANCE REPORT

The required Institutional & Engineering Controls Certification Form has been completed and signed by the Volunteer and by ERM Consulting & Engineering, Inc.'s (ERM) engineer-of-record. ERM conducted a Site-wide annual inspection on 15 February 2021. The results of the inspection are documented in the Inspection Form (Appendix A) and a photographic log (Appendix B). A summary of the status of the ICs and ECs is provided in the following sections.

3.1 Institutional Controls

A series of ICs is provided to (1) implement, maintain, and monitor Engineering Control systems; (2) prevent future exposure to remaining contamination; and, (3) limit the use and development of the Site to Industrial uses only. Adherence to these ICs on the Site is required by the BCP has been and will continue to be implemented under the ISMP. ICs identified in the ISMP may not be discontinued without a corresponding NYSDEC-approved amendment to the ISMP. The IC boundaries are shown on Figure 3. These ICs are:

- *The property may be used for Industrial use;*

The long-term Engineering and Institutional Controls remained in place throughout this reporting period and the Site use remains as industrial.

- *All ECs must be operated and maintained as specified in ISMP;*

The long-term ECs remain in place throughout this reporting period.

- *All ECs must be inspected at a frequency and in a manner defined in ISMP.*

The EC was inspected annually per the ISMP and was last performed in February 2022 in this reporting period.

- *Notification of slab penetration in buildings with slab engineering controls with workers following operator safety procedures.*

The procedures remain in place. No slab penetrations were performed during this reporting period.

- *Soil vapor and indoor air monitoring must be performed as defined in ISMP;*

Per the inspection – no soil vapor and air monitoring were performed during this period

- *Data and information pertinent to Site management must be reported at the frequency and in a manner as defined in this ISMP;*

An Annual Report is prepared per the ISMP

- *All future activities that will disturb remaining contaminated material must be conducted in accordance with ISMP;*

The remaining contamination was not disturbed during this reporting period. Internal procedures remain in place

- *Monitoring to assess the performance and effectiveness of the remedy must be performed as defined in ISMP;*

The EC was inspected annually per the ISMP. No additional air monitoring was indicated as necessary per the inspection.

- *Operation, maintenance, monitoring, inspection, and reporting of any mechanical or physical component of the remedy shall be performed as defined in ISMP;*

As part of routine maintenance, visible cracks and gaps in the slab in newly accessible areas were sealed in the same manner as others previously remediated. ERM inspected the areas to confirm sealing.

- *Access to the Site must be provided to agents, employees, or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by ISMP.*

Site remains accessible. Agents, employees, or other representatives of the State of New York did not access site during reporting period.

- *The potential for vapor intrusion must be evaluated for any buildings developed in the area within the IC boundaries noted on Figure 3, and any potential impacts that are identified must be monitored or mitigated;*

No new buildings were developed in the reporting period.

3.2 Engineering Controls

3.2.1 Cover (or Cap)

The main goal of the Site Cover System (Cap) is to prevent exposure to remaining contamination in soil and soil vapor at the Site. The cover system is comprised of a concrete building slab. There have been no disturbances to the Site Cover System during this reporting period.

4. MONITORING PLAN COMPLIANCE REPORT

4.1 Components of the Monitoring Plan

The following Table 1 summarizes the elements of the monitoring program:

Monitoring Program	Frequency*	Matrix	Analysis
Site Cover System	Annual	Not applicable	Visual
Indoor Air	Per inspection,(if there is site cover or building slab/foundation disturbance), as directed by NYSDEC/NYSDOH, or as elected by the BCP participant	Indoor Air	VOCs via EPA Method TO-15
Soil Vapor	As indicated by Indoor Air Results, as directed by NYSDEC/NYSDOH, or as elected by the BCP participant	Soil Vapor	VOCs via EPA Method TO-15

* The frequency of events will be conducted as specified until otherwise approved by NYSDEC and NYSDOH.

4.2 Summary of Monitoring Completed

4.2.1 Site Cover System

An annual site inspection of the Main Building was performed on 15 February 2021 to monitor the condition of the Site Cover System. The annual inspection of the Main Building confirmed that the integrity of the Site cover system remains intact. A copy of the inspection form is provided as Appendix B.

An additional inspection of the Hundreds Building was performed during this reporting period as described in the May 2021 Hundred Building Soil Vapor Intrusion Interim Remedial Measure Workplan. Concurrent to inspections required of the Hundred Building remedial action, ERM inspected routine maintenance of the Site Cover System performed in the Main Building. Maintenance of the site cover system was performed in accordance with the ISMP.

A photolog of the February 2021 inspection and main building maintenance performed during this reporting period are documented in Appendix C.

4.2.2 Indoor Air Monitoring

Per the inspection of the Main building in February 2021 and subsequent inspection of reporting period cover system maintenance, no disturbances of the slab or foundation were observed. Additionally, ERM and facility personnel confirmed there were no changes to products used in the manufacturing process, including the flux cleaners containing TCE as described in the ISMP. Accordingly, the site remains under the same Occupational Safety and Health Administration (OSHA) standard for permissible exposure levels.

As the cover system was confirmed to be of good integrity and no changes were made to manufacturing products, Indoor Air sampling was not recommended by ERM. Additionally no IA samples were directed by NYSDEC/NYSDOH or elected to be collected by the BCP participant.

IA sampling conducted at the Hundreds Building during this reporting period is provided under separate cover.

4.2.3 Sub-Slab Vapor Monitoring

As no indoor air samples were collected during this reporting period, ERM did not recommend the collection of sub-slab samples. Additionally no indoor air samples were directed by NYSDEC/NYSDOH or elected to be conducted by the BCP participant.

Sub-slab vapor sampling conducted at the Hundreds Building during this reporting period is provided under separate cover.

4.3 Comparison with Remedial Objectives

Soil

Based upon the monitoring described in Section 4.2 the annual inspection confirmed the ECs (slab) was of good integrity and is effective at preventing the inhalation of contaminants volatilizing from the soil.

Soil Vapor

Based upon the monitoring described in Section 4.2 the annual inspection confirmed the ECs is function to mitigate the impact to public health resulting from the potential soil vapor intrusion into buildings at a site

4.4 Summary of Monitoring Deficiencies

Site operations were performed in full compliance with the ISMP this reporting period. The site cover system was confirmed to be of good integrity and the routine maintenance for areas not previously accessible were performed and inspected by ERM.

Facility personnel will continue to communicate with ERM as new areas become accessible and any changes in VOC containing products used at the facility. ERM will inspect maintenance performed as required in the ISMP.

4.5 Conclusions and Recommendations for Change

The inspection results collected during this reporting period indicates that the ECs and ICs are functioning as designed and are meeting the RAOs for the Site. No analytical indoor air or sub-slab vapor samples were collected during this reporting period.

Facility personnel will continue to search for low or lower VOC products that are appropriate for manufacturing operations.

5. OPERATION AND MAINTENANCE PLAN COMPLIANCE REPORT

Routine maintenance and inspection was conducted to ensure the integrity of the Site Cover System. As an active manufacturing facility, equipment and processes may change and areas previously inaccessible will become available for inspection.

Qualified building personnel and/or sub-contractors will seal cracks and gaps in the slab as observed.

On annual basis, ERM personnel performed the following activities:

- Inspect the floor slab and foundation walls for evidence of cracks and/or holes, and repair of cracks and/or holes, if required.

Determine, through discussions with building management, if any Heating, Ventilation, and Air Conditioning (HVAC) system modifications occurred.

These items are noted on the Site-Wide Inspection Form – Appendix B.

5.1 O&M Deficiencies

Site operations and maintenance were performed in full compliance with the ISMP this reporting period. The site cover system remained in good condition and routine maintenance for areas not previously accessible were performed according to the ISMP and were inspected by ERM. No changes were reported for the facility HVAC system

5.2 Conclusions and Recommendations for Change

The ECs performed as designed during this reporting period. It is noted the operations and monitoring program will expand to include of the Hundreds Building in the next reporting period. Details of the program are included under separate cover in an amended site ISMP

6. OVERALL ANNUAL REPORT CONCLUSIONS AND RECOMEDATIONS

A change in ownership of the Site has not occurred during this reporting period, and the use of the Site remains solely industrial in compliance. There has been no disturbance of the Site cover system during this reporting period.

The ECs performed as designed and maintained during this reporting period and meets the RAOs for the Site.

It is noted that the additional inspection, remedial actions, and sampling were performed at the Hundreds Building during this reporting period. Accordingly, the ISMP will be amended and reflected in the next Annual Report.

A summary of ongoing action items is identified below:

- Continue implementing the existing ISMP;
- Amend the ISMP to reflect current monitoring requirements following remedial actions performed at the Hundreds Building ;
- Submit next Annual Report in April 2023.

7. REFERENCES

ERM, 2021. Soil Vapor Intrusion Interim Site Management Plan, G.W. Lisk, Inc. Facility, 2 South Street, Village of Clifton Springs, Ontario County, New York, NYSDEC Site number C835026.

APPENDIX A ANNUAL SITE INSPECTION FORM

Item #	Inspection Item	Yes	No	Inspector Comments	Notes
1	Has a change of ownership occurred		x		NYSDEC must be informed 60 days in advance
2	Has there been any change in Site Use?		x		Current Site Use is Industrial. NYSDEC must be informed 60 days in advance per 6 NYCRR Part 375-1.11(d)
3	Are there any plans to construct a new building?		x		Per Section 2.3.2 of the SMP, a soil vapor intrusion monitoring plan must be prepared and submitted to NYSDEC prior to any construction.
4	Have any soil disturbances occurred in the past?		x		Documentation must be provided as required by the Excavation Work Plan (Appendix B)
5	Are any soil disturbances planned at this time?		x		NYSDEC must be informed 15 days in advance
6	Have there been any disturbances to the elements of the cover system (building concrete slab)?		x		
7	Has any equipment been removed or added that would have affected the building slab (i.e. holes in the floor from former anchor bolts etc.)?	x		Active facility - equipment and processes are moved as needed. Emphasize to site staff to perform maintenance/sealing as needed	
8	Has there been any modification to the floor system such as pipe runs or sumps added or filled in?		x		
12	Building slab - Are there any significant cracks, settlement, or erosion?	x		Existing cracks have been sealed. Existing repairs are in good shape	
16	Is there any activity that may tend to interfere with the completed remedy or the continued ability to implement institutional controls?		x		
Item #	Inspection Item	Yes	No	Inspector Comments	Notes

Corrective Measures:
Specify any corrective measures needed (e.g., seal floor cracks, wall gaps, etc.):

Continue to seal cracks as new areas are exposed. Notify ERM of sealing activities and for inspection

Sub-Slab Sample Port Inspection:
Provide the following information for each sample port on a scaled site map:
Location & identification of port
port cover/cap in place
Overall port integrity

All ports have been inspected - and are acceptable
See annual report - Figure 3 for location

<p><u>Photographs:</u> Attach photos showing status of the cover elements</p>
<p>Name of Inspector: Stephen A. Mirabello</p> <p>Signature of Inspector: </p> <p>Date of Inspection: 2/15/21</p> <p>Date of Last Inspection: Initial following ISMP</p> <p>Required Date of Next Inspection: February 2022</p> <p>Identify expected inspector for next inspection: S. Mirabello</p>
<p>Additional comments or drawings:</p> <p>Performed additional inspection of Hundred building. Identified cracks/gaps that will be sealed as part of a remedial action anticipated in 2021. Confirm facility utilizes flux cleaner/manufacturing products that contain TCE impurities.</p>

APPENDIX B ANNUAL SITE INSPECTION PHOTOGRAPHIC LOG

Annual ISMP Inspection - ERM Project # 0587557

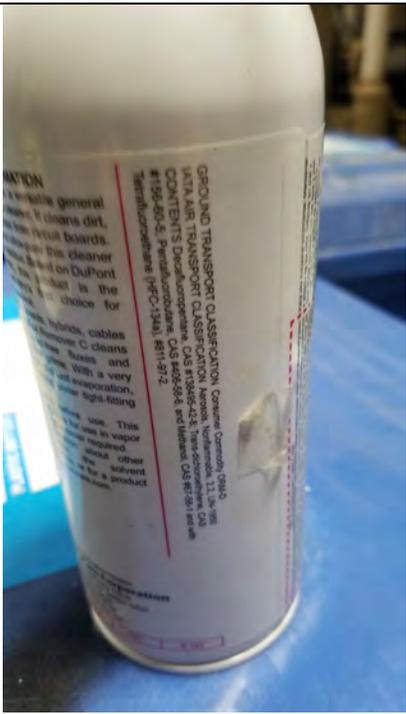
PHOTO LOG

Property ID: GW Lisk		Property Location: Clifton Springs, NY	
Photo #: 1	Date: 15- February-2021		
Description: Building 6 – West side of building – epoxy coated floor.			

Property ID: GW Lisk		Property Location: Clifton Springs, NY	
Photo #: 2	Date: 15- February-2021		
Description: Building 7- Edge of floor slab at masonry walls. Repaired gap in-tact.			

Annual ISMP Inspection - ERM Project # 0587557

Property ID: GW Lisk		Property Location: Clifton Springs, NY	
Photo #: 3	Date: 15- February-2021		
Description: Flux cleaner used in facility – contains trans- DCE with TCE impurities			

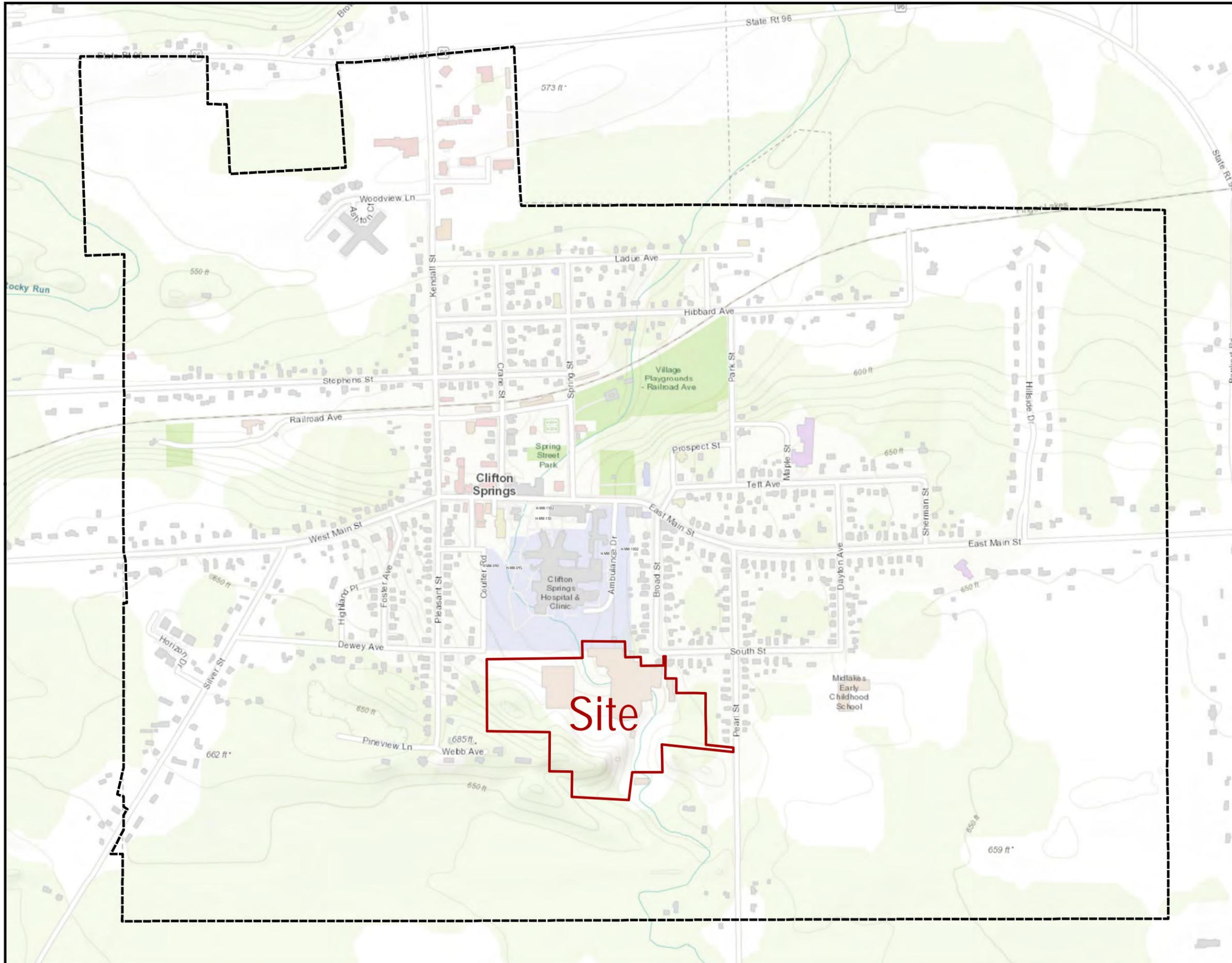
Property ID: GW Lisk		Property Location: Clifton Springs, NY	
Photo #: 4	Date: 15- February-2021		
Description: Flux cleaner used in facility – contains trans- DCE with TCE impurities			

Annual ISMP Inspection - ERM Project # 0587557

Property ID: GW Lisk		Property Location: Clifton Springs, NY	
Photo #: 5	Date: 15-February-2021		
Description: Vac Furnace Room – repaired floor cracks in tact			

Property ID: GW Lisk		Property Location: Clifton Springs, NY	
Photo #: 6	Date: 15-February-2021		
Description: Building 4A –Sub-slab sampling point – needs repair.			

FIGURES



Legend

-  Property Parcel Boundary
-  Village of Clifton Springs

NOTES:

- Basemap provided by ESRI World Topography.

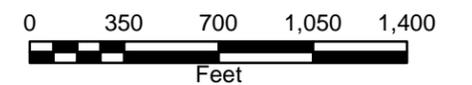
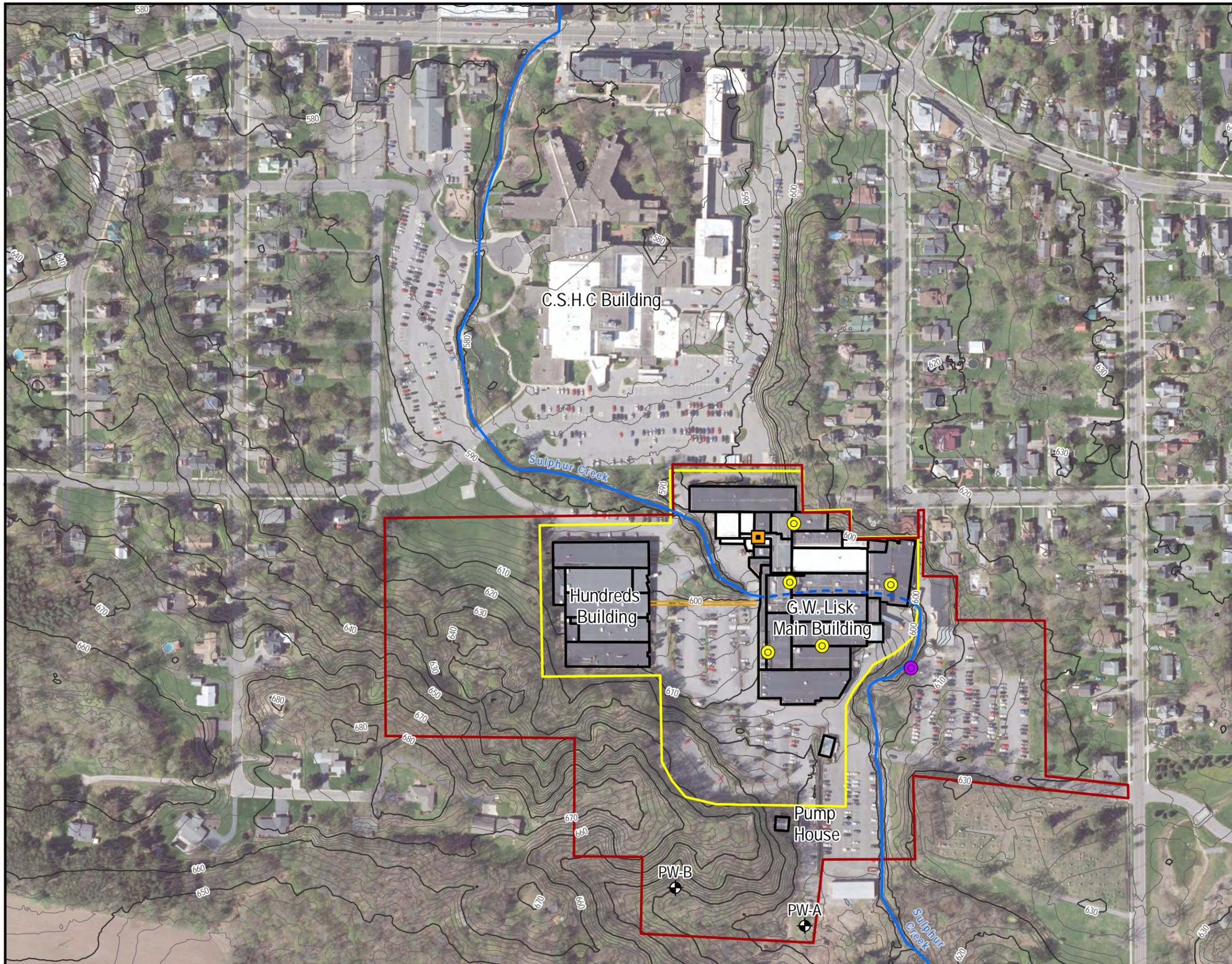


Figure 1: Site Location Map
 G.W. Lisk Company, Inc.
 2 South Street, Clifton Springs, NY





Legend

- Water Supply Wells
- Former Degreaser Sump
- Former Outfall Location
- Stormwater Outfall Location
- Former Trench (Approximate)
- Surface Stream
- Inferred Stream Path
- 2 ft. Elevation Contour
- 10 ft. Elevation Contour
- Property Parcel Boundary
- BCP Boundary
- Facility Outline

NOTES:

- Facility room outlines are approximate in location and converted from AutoCAD models.
- Surface elevation contours are modified from Ontario County, 2017.
- Elevation is reported as feet above Mean Sea Level (MSL).
- Aerial imagery provided by Esri World Imagery.

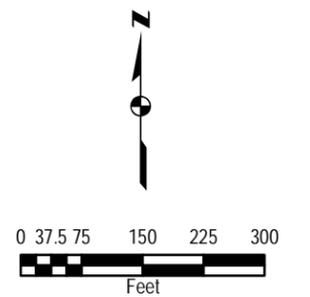
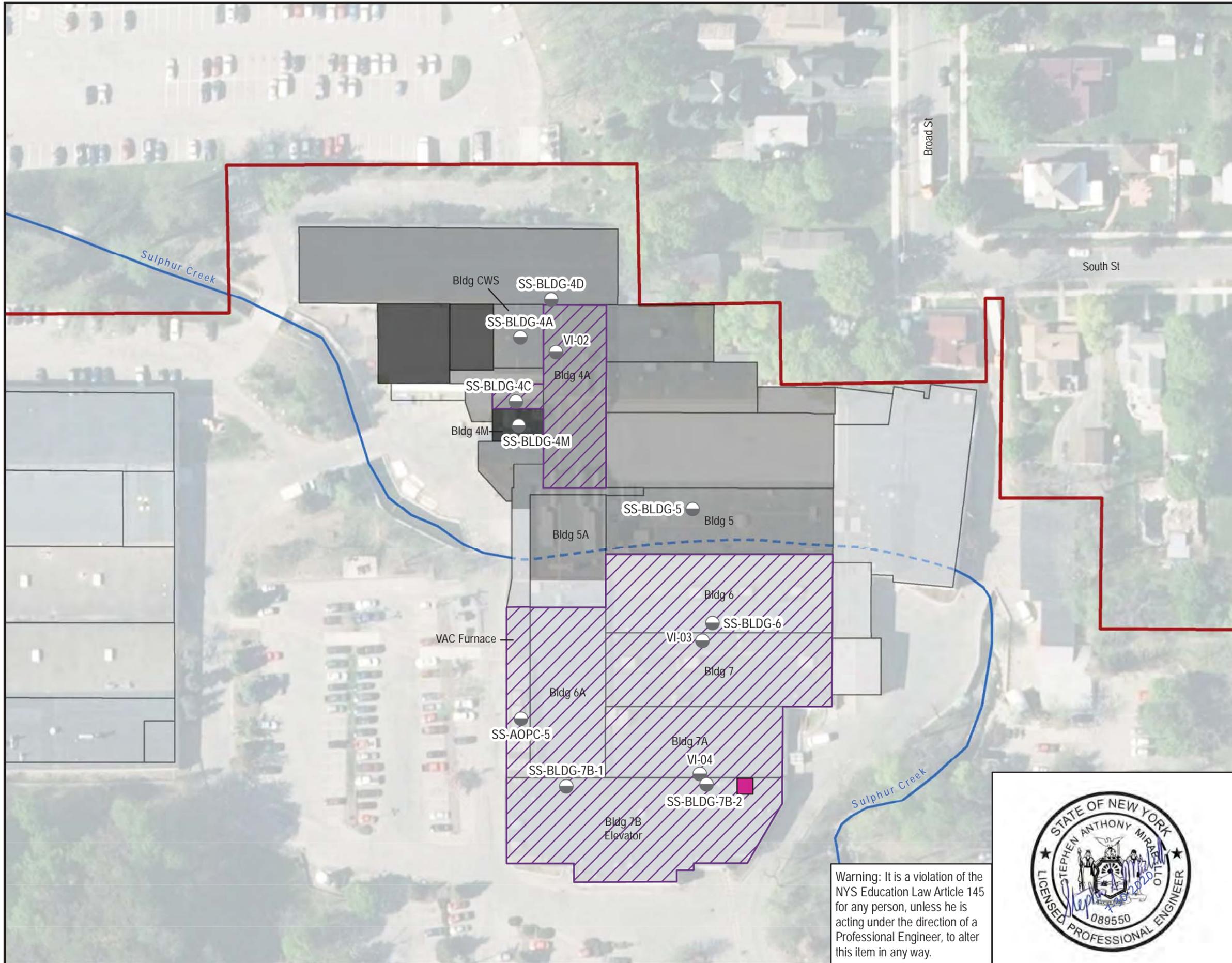


Figure 2: Site Layout Map
 G.W. Lisk Company, Inc.
 2 South Street, Clifton Springs, NY



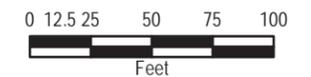


Legend

- In-Slab Sample Port
- Engineering Controls**
- Sealed Building Slab
- Facility Foundation Levels**
- Level 1
- Level 2
- Level 3
- Property Parcel Boundary
- Facility Outline
- Building 7B Elevator Shaft
- Surface Stream
- Inferred Stream Path

NOTES:

- Facility room outlines are approximate in location and converted from AutoCAD models.
- Aerial imagery was captured in 2015 by New York State.
- Elevator shaft sealed below grade.



Warning: It is a violation of the NYS Education Law Article 145 for any person, unless he is acting under the direction of a Professional Engineer, to alter this item in any way.



Figure 3	Institutional and Engineering Control Map		
Prepared For	G. W. Lisk		
ERM Consulting & Engineering, Inc.			
Drawn By ORB	Scale 1:900	Date 11 May 2020	Job Number 0500166.05

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