PERIODIC REVIEW REPORT
REPORTING PERIOD: FEBRUARY 11, 2019 THROUGH FEBRUARY 10, 2020

211 FRANKLIN STREET
OLEAN, NEW YORK
NYSDEC SITE NO. C905038

This Periodic Review Report (PRR) was prepared in accordance with the provisions of the document *DER-10 Technical Guidance for Site Investigation and Remediation* (DER-10). This is the fourth PRR submitted for New York State Department of Environmental Conservation (NYSDEC) Site No. C905038 located at 211 Franklin Street, City of Olean, Cattaraugus County, New York (the Site). This document presents a summary of site characterization and remedial activities conducted at the Site pursuant to obtaining a Certificate of Completion issued on November 12, 2015, and the site management activities completed in the period between February 11, 2019 and February 10, 2020 (the reporting period). The site management requirements are outlined in the document titled *211 Franklin Street, Cattaraugus County, City of Olean, New York, Site Management Plan, NYSDEC Site Number: C905038*, dated October 2015, (the SMP) as modified by Revision No.1 (i.e., reduction in scope and frequency to post-remediation monitoring program) approved by the NYSDEC on March 21, 2017 (the SMP Revision 1). [Note: As described in the PRR for the most-recent report period (i.e., February 11, 2018 through February 10, 2019), the period of post-remediation indoor air and groundwater sampling and testing was completed in accordance with the schedule and procedures outlined in the SMP Revision 1 (i.e., media monitoring of groundwater and indoor air for a period of three years to assess the effectiveness of the remedy). The indoor air and groundwater sampling and testing completed demonstrated that the remedial program met, and has the ability to achieve, the remedial objectives for the Site. As such, it was concluded that additional media sampling events did not appear necessary in order to demonstrate or maintain the effectiveness of the Site remedy. Therefore, indoor air and groundwater sampling was not completed during the current report period. However, in a letter dated February 15, 2020 the NYSDEC and New York State Department of Health (NYSDOH) requested some additional testing to confirm potential impacts in localized areas of the Site. Based on discussions with the NYSDEC and NYSDOH, an additional groundwater sample will be collected from monitoring well MW-F, and tested for volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs). Further, it was determined that indoor air samples should also be collected from locations designated Area 1 and Area 2, in addition to a background sample, and tested for VOCs. It was agreed that these samples will be collected in March 2020, and that the results would be provided as an addendum to this report. Depending on the results of this testing, the need for subsequent sampling and testing will be evaluated.]

This report includes the following elements:

- Site background information;
- identification of the remedial goals established for the Site;
- a description of the Institutional Controls (ICs) and Engineering Controls (ECs) for the Site;
- a review of monitoring protocols and results;
- a description of site monitoring activities and site inspections;
- an evaluation of the remedy performance, effectiveness and protectiveness; and,
- conclusions and recommendations based on the work completed to date.

I. Executive Summary

A. Site Conditions, Contamination and Remedial History

- The Site consists of a 5.79-acre parcel of land developed with an approximate 280,000 square foot, two-story industrial building with a partial basement (refer to the Project Locus Map included as Figure 1).

- Silence Dogood, LLC entered into the Brownfield Cleanup Program (BCP) administered by the NYSDEC in accordance with Brownfield Cleanup Agreement (BCA) Index # C905038-05-14, which was executed on May 22, 2014, to investigate and remediate the Site. As outlined in the BCA, Silence Dogood, LLC is a Volunteer with respect to the requirements of the BCP.

- A Remedial Investigation (RI) was performed to characterize the nature and extent of contamination at the Site. As summarized in the April 2015 RI report, the following conditions were identified at the Site, prior to remediation: localized impacts to surface soil and subsurface soil/fill from various PAHs and metals (and PCBs in isolated areas); impacts to site-related groundwater from metals, in addition to petroleum-related impacts to the groundwater on the western portion of the Site that originated from an off-site location; and impacts to soil vapor beneath the building on the Site from various chlorinated and/or non-chlorinated VOCs including acetone, trichloroethene (TCE) and tetrachloroethene (PCE).

- The Site was remediated in accordance with the provisions of a Decision Document (DD), issued by the NYSDEC dated September 1, 2015. The DD included Remedial Action Objectives for public health protection pertaining to soil vapor, soil and groundwater impacts related to the Site. The DD also specified the selected remedy for the Site, as Track 4 Restricted (Commercial) Use with site-specific soil cleanup objectives. See Section II.B. of this PRR for a summary of the remedial actions completed under the DD.

- Day Environmental, Inc. (DAY) prepared a Site Management Plan (SMP) on behalf of Silence Dogood, LLC, and this document was approved by the NYSDEC. The site management requirements outlined in Section 6.3(b) of DER-10, and the SMP were implemented at the Site beginning on November 12, 2015.

- A certificate of completion (COC), documenting the satisfactory implementation of the remedial program, was issued for NYSDEC Site #C905038 on November 12, 2015. The COC identified ongoing requirements for the Site, including compliance with the SMP, periodic reporting through PRRs, and periodic certification of the Engineering Controls (EC) and Institutional Controls (IC) that are required at the Site.

- DAY prepared a letter on behalf of Silence Dogood, LLC dated February 16, 2017, outlining proposed modifications to the SMP and monitoring schedule. The recommendations in this document were approved by the NYSDEC in a letter dated March 21, 2017. These proposed modifications to the SMP and monitoring schedule were implemented at the Site starting on March 21, 2017.

B. Effectiveness of the Remedial Program

Progress made during the reporting period toward meeting the remedial objectives for the Site include continued operation and monitoring of the EC, including the site-wide cover system and sub-slab depressurization system (SSDS); and post-remediation media testing, including indoor air and groundwater. Monitoring data from the work completed to date shows that the remedial program is currently meeting, and has the ability to achieve, the remedial objectives for the Site.

C. Compliance

No areas of non-compliance with the SMP Revision 1 were identified during the reporting period. As such, no steps are currently deemed necessary to correct areas of non-compliance.

D. Recommendations

1. The requirements identified in the SMP Revision 1 for the Site were met during the reporting period, and no modifications are required at this time to bring the plan into compliance.

2. It is recommended that the frequency of future PRRs remain as identified in the SMP Revision 1 (i.e., submitted every year subsequent to this report, such that the next PRR covers the reporting period February 11, 2020 through February 10, 2021).

3. In accordance with the SMP Revision 1 monitoring schedule, groundwater and indoor air monitoring was to be completed for a period of three years to assess the effectiveness of the remedy. Based upon the reported results over this three-year period, the remedy has been confirmed to be effective. However, the NYSDEC has requested that an additional groundwater sample be collected from monitoring well MW-F (i.e., located in the shipping lot on the western portion of the Site) and that this sample be tested for VOCs and SVOC to assess the concentrations of chloroform and bis (2-ethylhexyl) phthalate (respectively) detected during the most-recent sampling event at this location. [Note: The concentration of chloroform detected in the June 2018 groundwater sample collected from monitoring well MW-F exceeded the groundwater standard of 7 parts per billion (ppb) and the concentration of bis (2-ethylhexyl) phthalate detected in the June 2016 and June 2017 groundwater samples collected from monitoring well MW-F exceeded the groundwater standard of 5 ppb for bis (2-ethylhexyl) phthalate.] Further the NYSDOH also requested that additional indoor air samples be collected. To this end, it was agreed that indoor air samples will be collected from Area 1 and Area 2 (i.e., located in the northern portion of the building at the Site), and a background air sample from a location to be determined at the time of sampling. The samples collected will be tested for VOCs to assess the current indoor air quality in these areas. The NYSDEC has indicated that once the analytical data from the indoor air and groundwater sampling events are received, the monitoring schedule can be re-assessed for cessation. It is anticipated that the groundwater and air samples will be collected in March 2020 and that the results will be submitted as an addendum to this PRR.

4. Since residual contamination remains at the Site, it is recommended that site management requirements be continued to document the continued effectiveness of the ICs and ECs implemented.

II. Site Overview

A. Site Location, Site Features and Nature and Extent of Contamination

The Site is located in City of Olean, Cattaraugus County, New York and is identified as Section 94.040 Block 1 and Lot 21 on the Cattaraugus County Tax Map. The Site is bound by Franklin Street followed by a parking lot, athletic field and undeveloped land to the north-northwest; by a railroad Right-of-Way (ROW) to the south-southeast; by an undeveloped lot to the east-northeast; and by a railroad ROW to the west-northwest. A Property Survey Map of the Site is included in Attachment A of this document.

The properties adjoining the Site and, in the neighborhood, surrounding the Site are primarily utilized for residential and industrial uses. The properties immediately south-southeast of the Site include a railroad ROW followed by residential properties; the properties immediately north-northwest of the Site include Franklin Street followed by commercial and vacant properties, including BCP Site #905043, and parkland; the properties immediately east-northeast of the Site include grass-covered vacant properties followed by residential properties; and the properties to the west-southwest of the Site include a railroad ROW followed by commercial and industrial properties.

The Site consists of an approximate 5.79-acre parcel of land developed with an approximate 280,000 square foot, two-story industrial building with a partial basement. The Site is zoned industrial and is currently utilized for industrial use. The Site is occupied by SolEpoxy Inc., which manufactures molding powders, coating powders, and formulated resins used to insulate electrical components.

A Remedial Investigation (RI) was performed to characterize the nature and extent of contamination at the Site. The results of this study are described in the following report:

- *Remedial Investigation Alternatives Analysis Report, 211 Franklin Street, City of Olean, Cattaraugus County, New York, BCP Site Number: C905038,* dated January 2015 (Revised April 10, 2015)

The April 2015 RI identified the following conditions at the Site, prior to remediation:

- Impacts to surface soil from: various polycyclic aromatic hydrocarbons (PAHs); polychlorinated biphenyls (PCBs) in isolated locations; and metals including arsenic, cadmium, copper, mercury and nickel.

- Impacts to subsurface soil/fill from various PAHs and metals including: arsenic, cadmium, copper, lead, mercury, nickel, and zinc.

- Impacts to site-related groundwater from metals, including barium, chromium, magnesium, selenium and thallium; and petroleum-related impacts to the groundwater on the western portion of the Site, which originated from an off-site location.

- Impacts to soil vapor from various chlorinated and/or non-chlorinated VOCs, including acetone, trichloroethene (TCE) and tetrachloroethene (PCE).

B. Chronology

A chronology of Remedial Actions performed at the Site is presented below.

- Silence Dogood, LLC entered into the BCP administered by (NYSDEC) in accordance with Brownfield Cleanup Agreement Index # C905038-05-14, which was executed on May 22, 2014, to investigate and remediate the Site. As outlined in the BCA, Silence Dogood, LLC is a Volunteer with respect to the requirements of the BCP.

- The Site was remediated under a DD, issued by the NYSDEC dated September 1, 2015. The DD included Remedial Action Objectives for public health protection pertaining to Site related soil vapor, soil and groundwater. The DD specified the selected remedy for the Site, as Track 4 Restricted (Commercial) Use with site-specific soil cleanup objectives. Elements of the Remedy include:

  - A site cover constructed and maintained to provide a barrier above surface soil containing concentrations that exceed the Restricted Commercial Use soil cleanup objectives (SCOs). The cover consists of a continuous concrete pad within the footprint of the existing building; and concrete/asphalt pavement, concrete sidewalk, and/or one-foot thick soil cover over exterior locations. Where the soil cover was utilized, a minimum of one foot of soil was used as set forth in 6 NYCRR Part 375-6.7(d) for commercial use. The soil cover was placed over a demarcation layer, with the upper four inches of placed soil of sufficient quality to maintain a vegetation layer. Fill material brought to the Site for use as cover material met the requirements set forth in 6 NYCRR Part 375-6.7(d);

  - A SSDS installed beneath a portion of the building at the Site where elevated soil gas concentrations of chlorinated VOCs, primarily PCE and TCE, were identified (see Figure 2). The purpose of the SSDS is to preclude the migration of vapors into the building;

  - Imposition of an institutional control in the form of an environmental easement for the controlled property;

  - Development and implementation of a SMP; and

  - Periodic certification of the institutional and engineering controls

- The remediation of the Site was completed in accordance with a Remedial Action Work Plan that was approved by the NYSDEC on September 1, 2015.

- DAY prepared a SMP on behalf of Silence Dogood, LLC, dated October 2015, and this document was approved by the NYSDEC. The site management requirements outlined in Section 6.3(b) of DER-10, and the SMP were implemented at the Site beginning on November 12, 2015. The SMP includes an Institutional and Engineering Control Plan that identifies use restrictions and engineering controls for

the site, a Monitoring Plan to assess the performance and effectiveness of the Remedy, an Operation and Maintenance Plan to insure the continued operation of the SSDS, and details the steps and media-specific requirements necessary to ensure that the institutional and/or engineering controls remain in place and effective. [Note: Revision No.1 to the SMP, dated February 16, 2017, was approved by the NYSDEC on March 21, 2017. The revision included a reduction in the scope, frequency, and duration of the post-remediation monitoring program.]

- A COC was issued for NYSDEC Site #C905038 on November 12, 2015, documenting completion of the remedial program. The COC identified ongoing requirements for the Site, including compliance with the SMP, periodic reporting through PRRs, and periodic certification of the Engineering Controls (EC) and Institutional Controls (IC) that are required at the Site.

As presented in the DD, the cleanup goals for the Site are to prevent ingestion/direct contact with contaminated surface and subsurface soil/fill materials, prevent exposure to onsite groundwater, and prevent exposure to contaminants volatizing from subsurface locations. Generally, remedial processes are considered complete when effectiveness monitoring indicates that the remedy has achieved the remedial action objectives identified by the decision document. The framework for determining when remedial processes are complete is provided in Section 6.6 of NYSDEC DER-10.

III. Evaluation of Remedy Performance, Effectiveness and Protectiveness

The Site remedy included:

- the placement, and/or maintenance, of a site-wide cover system (i.e., concrete/asphalt pavement, concrete sidewalk, and/or one-foot thick soil cover over exterior locations and continuous concrete pad within the footprint of the existing building) to prevent direct contact with impacted materials (i.e., surface soil, subsurface soil/fill, etc.),

- continuous operation of a SSDS installed in the central portion of the building, to mitigate the potential for vapor intrusion into the indoor air; and

- institutional controls to prevent exposure to onsite groundwater.

The effectiveness of this remedy was evaluated during the reporting period by the completion of an annual inspection of the cover system, quarterly (or more frequent) measurements of SSDS system pressure, and annual review of the SSDS mechanical components (i.e., the exhaust fans).

- On June 19, 2019, a DAY representative completed the annual inspection of the site-wide cover system. A copy of the site-wide inspection form, completed during the June 19, 2019 inspection is included in Attachment B. Photographs, taken on June 19, 2019 illustrating the condition of the exterior site cover on that date (and the trenches constructed during the installation of the SSDS), are also included in Attachment B.

- Periodic monitoring of vacuum pressure at the inlet side of each of the two exhaust fans that operate the SSDS at the Site (i.e., designated Fan #1 and Fan #2) was completed at approximate monthly intervals between February 2019 and February 2020. Copies of the monitoring logs completed during the reporting period for Fan #1 and Fan #2 are included in Attachment C.

- On June 7, 2019, an annual review of the SSDS was performed to confirm that the mechanical components (i.e., Fan #1 and Fan #2) were operating as intended, and to identify the need for maintenance (if any). Copies of the results of the annual review are included in Attachment C.

IV. IC/EC Compliance Report

A. IC/EC Compliance Report

1. A description of each control, its objective, and how performance of the control is evaluated is provided below.

- Groundwater Use Restriction: restricts the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the New York State Department of Health (NYSDOH) and/or the Cattaraugus County Department of Health. The effectiveness of this control is evaluated based upon monitoring of groundwater usage at the Site (or lack thereof).

- Land use Restriction: allows the use and development of the controlled property for commercial and industrial uses as defined by 6 NYCRR Part 375-1.8(g), although land use is subject to local zoning laws. The effectiveness of this control is evaluated based upon monitoring of land usage at the Site.

- Site Management Plan: The objective of the SMP is to manage remaining contamination present at the Site that is above regulatory criteria in a manner that is protective of human health and the environment. The SMP includes an Institutional and Engineering Control (IC/EC) Plan, a Site Monitoring Plan an Operation and Maintenance (O&M) Plan and an excavation plan (i.e., the excavation work plan included as Appendix B of the SMP). The effectiveness of the controls outlined above is evaluated through monitoring and periodic certification. Controls on the Site include:

  - Construction and maintenance of a site-wide cover system to provide a barrier above surface soil containing concentrations that exceed the Restricted Commercial Use SCOs. The cover system consists of the continuous concrete pad within the footprint of the existing building, and a combination of concrete/asphalt pavement, concrete sidewalk, and one-foot thick soil cover on the exterior;

  - Installation and continued operation of the SSDS, installed beneath a designated section of the building on the Site to preclude the potential for migration of vapors into the building;

  - Routine monitoring to document the continued operation of the SSDS, the integrity of the site-wide cover system, and to document post remediation indoor air and groundwater conditions.

  - Implementation of specific requirements outlined in the SMP, including the provisions of the IC/EC Plan (i.e. Excavation Work Plan, Soil Vapor Intrusion Evaluation, and Contingency Plan), Site Monitoring Plan, and Operation and Maintenance Plan, to assure the provisions described in these documents are followed.

2. Status:

   Each control is fully in place, is being adhered to, and appears to be effective as of the date of this report.

   During the annual inspection of the site-wide cover system that occurred on June 19, 2019, one area of sparse vegetation (i.e., an area on the edge of the1-foot soil cover, reportedly partially bare of vegetation due to truck traffic), located at the southeast corner of the Site was observed and documented (refer to the photograph included in Attachment B). This area did not appear to have worsened since the previous annual inspection (i.e., June 2018), nor did it appear to compromise the integrity of the cover system in this area. Therefore, repairs in this area were not deemed necessary.

   A degraded portion of the concrete backfill located in the Packaging Department portion of the building (i.e., poured to replace portions of the interior floors in the areas where SSDS trenches had been excavated), which was documented with a photograph during the previous annual inspection in June 2018 and presented in the previous PRR (i.e., covering the period between February 11, 2018 through February 10, 2019), was repaired/resurfaced during the current reporting period. Refer to the photograph of the repaired/resurfaced area that was taken during the annual inspection event on June 19, 2019 and is included in Attachment B.

3. Corrective Measures:

   None required.

4. Conclusions and Recommendations for Changes:

   The controls are being effectively implemented as of the date of this report, and no changes are deemed necessary at this time.

B. IC/EC Certification

Certification Statement and forms are included as Attachment D to this report.

V. Monitoring Plan Compliance Report

A. Components

- Site-Wide Inspections: annual inspections are required to observe and document the condition of the cover system installed at the Site. Site-wide inspections are also required after all severe weather events that have the potential to affect ECs.

- Treatment System Monitoring: quarterly (or more frequent) system checks and an annual review are required to confirm that the SSDS is operating as intended, and to identify the need for maintenance.

- Post-Remediation Media Monitoring and Sampling: Groundwater samples and indoor air samples were collected/tested on an annual basis, for an initial period of

three years following completion of the remedy, to assess the performance of the remedy. [Note the sampling events that were completed during the previous reporting period were the last of the annual sampling events required by the SMP. However, as requested by the NYSDEC and NYSDOH additional sampling/testing of groundwater and indoor air will be completed for select locations in March 2020. Depending on the results of this testing, a determination will be made if additional sampling/testing is required.]

B. Summary of the Monitoring Completed

- Site-Wide Inspections: On June 19, 2019, a DAY representative completed the annual inspection of the site-wide cover system. A copy of the site-wide inspection form completed for June 19, 2019 is included in Attachment B. Photographs, taken on June 19, 2019 illustrating the condition of the site cover on that date are also included in Attachment B. No severe weather events that required a site-wide inspection occurred during the reporting period.

- Treatment System Monitoring: Periodic monitoring of vacuum pressure at the inlet side of each of the two exhaust fans that operate the SSDS at the Site (i.e., designated Fan #1 and Fan #2) was completed at approximate monthly intervals between February 2019 and February 2020. Copies of the monitoring logs completed during the reporting period for Fan #1 and Fan #2 are included in Attachment C.

  On June 7, 2019, an annual review of the SSDS was performed to confirm that the mechanical components (i.e., Fan #1 and Fan #2) were operating as intended, and to identify the need for maintenance (if any). Copies of the documents prepared summarizing the findings of the annual review are included in Attachment C.

- Post-Remediation Media Monitoring and Sampling:

  Indoor air samples and groundwater samples were not collected from the Site during the reporting period. However, as discussed herein samples will be collected from select locations in March 2020 and the results will be provided as an addendum to this PRR.

  A summary of volatile organic compounds (VOCs) detected by the analytical laboratory in the indoor air samples collected during the annual sampling events completed to date under the SMP is included in Table 1.

  Summaries of VOCs, semi-volatile organic compounds (SVOCs) and metals detected by the analytical laboratory in the groundwater samples collected during the annual sampling events completed to date under the SMP are included in Table 2, Table 3 and Table 4, respectively.

C. Comparison with Remedial Objectives

- Site-Wide Inspections: The results of the site-wide inspection indicate that remedial objectives were achieved during the reporting period. Specifically, the site-wide inspection revealed that the cover system is intact and functioning as designed to eliminate direct contact.

- Treatment System Monitoring: Measurements of vacuum pressure at the inlet side of Fan #1 recorded during the reporting period ranged between 2.4 in. and 2.5 in. Measurements of vacuum pressure at the inlet side of Fan #2 recorded during the reporting period ranged between 1.6 in. and 1.9 in. The measurements made during the reporting period indicate that the SSDS is functioning within the designed operating parameters, and that no repairs or system adjustments are required.

  The annual review of the SSDS that was performed June 7, 2019 confirmed that the mechanical components (i.e., Fan #1 and Fan #2) were operating as intended, and did not identify the need for any systems maintenance.

D. Monitoring Deficiencies

There are no monitoring deficiencies identified at this time. However, as a precautionary measure and as requested by NYSDEC, additional air and groundwater samples will be collected/tested from select locations in March 2020 to confirm this conclusion.

E. Conclusions and Recommendations for Changes

- Site-Wide Inspection and Treatment System Monitoring: The site-wide inspection and treatment system monitoring confirmed that the remedial systems/actions for the Site are functioning properly, and effective in achieving their intended objectives. No changes to the site-wide inspection, treatment system monitoring process, or remedial actions are recommended at this time.

- Post-Remediation Media Monitoring and Sampling:

  The period of post-remediation indoor air and groundwater sampling and testing has been completed in accordance with the schedule and procedures outlined in the SMP Revision 1 (i.e., media monitoring of groundwater and indoor air for a period of three years to assess the effectiveness of the remedy). The indoor air and groundwater sampling and testing completed to date demonstrates that the remedial program is currently meeting, and has the ability to achieve, the remedial objectives for the Site. However, the NYSDEC has requested that an additional groundwater sample be collected from monitoring well MW-F (i.e., located in the shipping lot on the western portion of the Site) and that this sample be tested for VOCs and SVOC to assess the concentrations of chloroform and bis (2-ethylhexyl) phthalate (respectively) detected during the most-recent sampling event at this location. Further the NYSDOH also requested that additional indoor air samples be collected. To this end, it was agreed that indoor air samples will be collected from Area 1 and Area 2 (i.e., located in the northern portion of the building at the Site), and a background air sample from a location to be determined at the time of sampling. The air samples collected will be tested for VOCs to assess the current indoor air quality in these areas. The NYSDEC has indicated that once the analytical data from the indoor air and groundwater sampling events are received, the monitoring schedule can be re-assessed for cessation. It is anticipated that the groundwater and air samples will be collected in March 2020 and that the results will be submitted as an addendum to this PRR.

VI. Operation & Maintenance (O&M) Plan Compliance Report

A. Components of the O & M Plan

The SSDS is designed for continuous, unmanned operation, and requires very little operation and maintenance labor. All components of this system are designed for years of uninterrupted service. Nonetheless, quarterly (or more frequent) system checks and annual reviews are performed to confirm that all are operating as intended, and to identify the need for any maintenance.

B. Summary of O & M Completed During the Reporting Period

Periodic monitoring of the SSDS has been discussed elsewhere in this report. The current components of the O&M Plan (continuous operation and periodic monitoring of the SSDS) started on August 11, 2015 and it continued throughout this reporting period.

C. Evaluation of the Remedial Systems

Periodic monitoring of the SSDS indicates that the system is operating as designed. Further, the results of the annual indoor air sample events that were completed in accordance with the schedule outlined in the SMP indicate that the SSDS is effectively mitigating soil vapor intrusion into the building at the Site.

D. O&M Deficiencies

No deficiencies were identified in complying with the O&M plan during the reporting period.

E. Conclusions and Recommendations for Improvements

No improvements to the O&M plan are recommended at this time.

VII. Overall PRR Conclusions and Recommendations

A. Compliance with SMP

The requirements identified in the SMP Revision 1 were met during the reporting period.

In accordance with the SMP Revision 1 monitoring schedule, groundwater and indoor air monitoring was to be completed for a period of three years to assess the effectiveness of the remedy. Based upon the reported results over this three-year period, the remedy has been confirmed to be effective. However, the NYSDEC has requested that an additional groundwater sample be collected from monitoring well MW-F (i.e., located in the shipping lot on the western portion of the Site) and that this sample be tested for VOCs and SVOC to assess the concentrations of chloroform and bis (2-ethylhexyl) phthalate (respectively) detected during the most-recent sampling event at this location. Further the NYSDOH also requested that additional indoor air samples be collected. To this end, it was agreed that indoor air samples will be collected from Area 1 and Area 2 (i.e., located in the northern portion of the building at the Site), and a background air sample from a location to be determined at the time of sampling. The air samples collected will be tested for VOCs to assess the current indoor air quality in these areas. The NYSDEC

has indicated that once the analytical data from the indoor air and groundwater sampling events are received, the monitoring schedule can be re-assessed for cessation. It is anticipated that the groundwater and air samples will be collected in March 2020 and that the results will be submitted as an addendum to this PRR.

B. Performance and Effectiveness of the Remedy

An evaluation of the components of the SMP during the reporting period indicates that:

- the IC/EC controls are protective of human health and the environment;
- the monitoring plan sufficiently monitors the performance of the remedies implemented;
- the O&M Plan adequately addresses the on-going operation of the SSDS; and
- the remedial program is achieving the remedial goals identified for the Site.

C. Future Submittals

1. Following the receipt and validation of laboratory data generated from the groundwater sampling and indoor air sampling events described above, the validated analytical data will be transmitted to the NYSDEC, and uploaded to the Department's Environmental Information Management System using the EQuIS platform.

2. It is recommended that the frequency of future PRRs remain as identified in the SMP Revision 1 (i.e., submitted every year subsequent to this report, such that the next PRR covers the reporting period February 11, 2020 through February 10, 2021).

3. The requirements for site closure have not been achieved. As such, it is recommended that site management continue.

PERIODIC REVIEW REPORT
REPORTING PERIOD FEBRUARY 11, 2019 THROUGH FEBRUARY 10, 2020

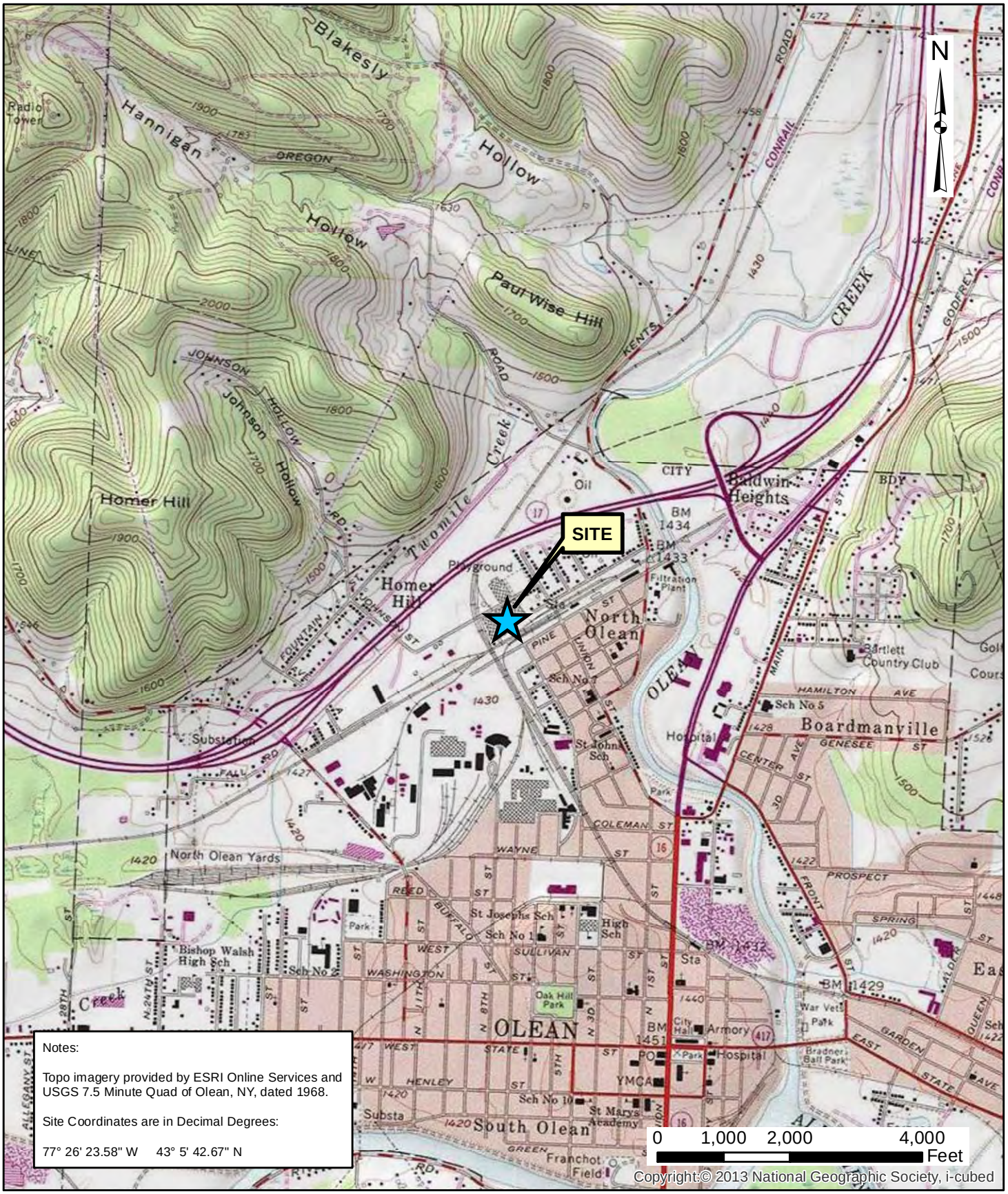
211 FRANKLIN STREET
OLEAN, NEW YORK
NYSDEC SITE NO. C905038

FIGURES

TABLES

ATTACHMENTS

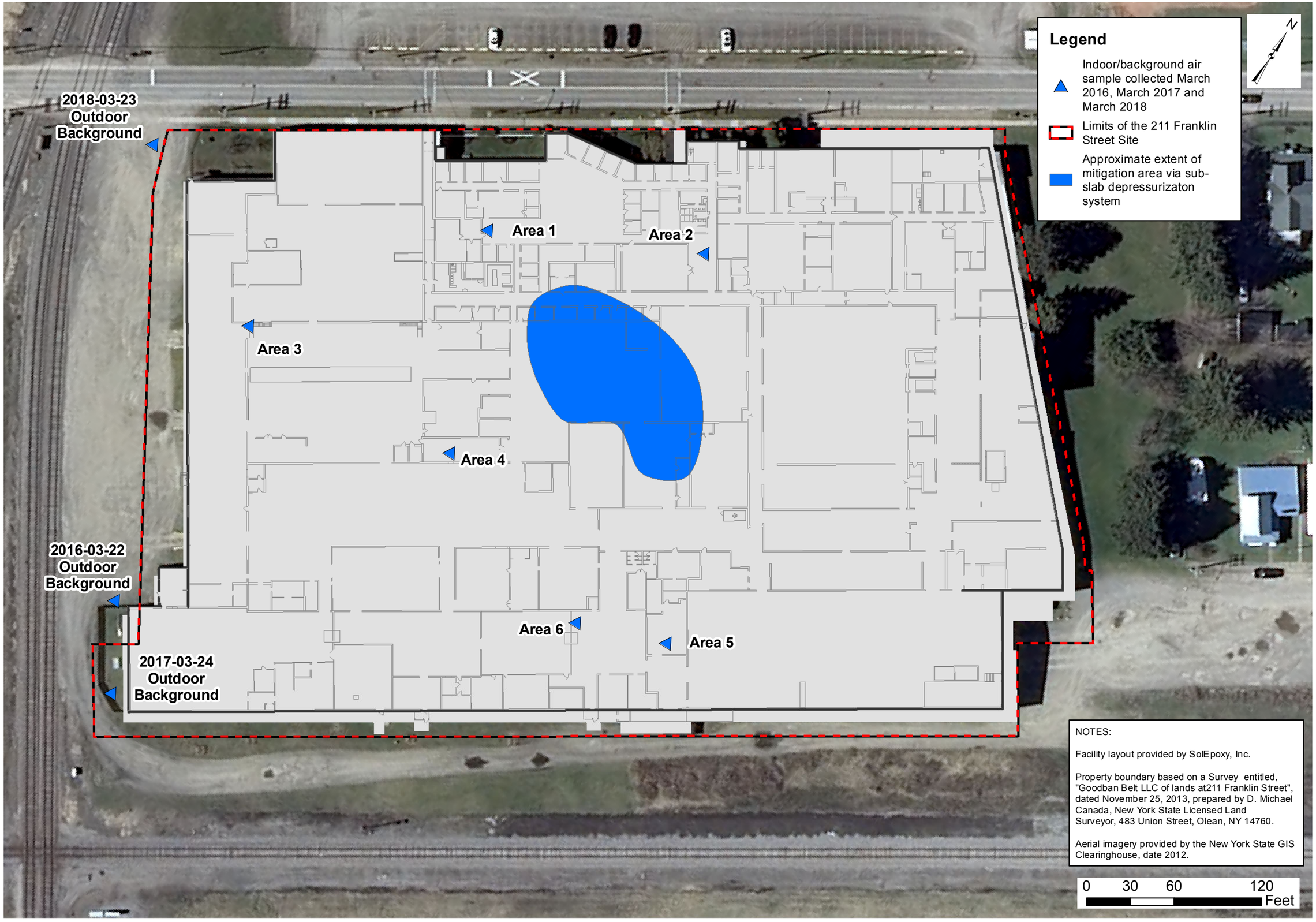
FIGURES



Document Path: E:\GIS Mapping\4884S-13Solepo\211Franklin\Periodic Reivew Report\4884S - 02 - Locus - PRR.mxd

Last Date Saved: 01 Mar 2017

Date: 2-28-2017 Drawn By: CAH Scale: AS NOTED	**DAY ENVIRONMENTAL, INC.** Environmental Consultants Rochester, New York 14606 New York, New York 10170	Project Title: 211 FRANKLIN STREET OLEAN, NEW YORK BCP SITE NO. C905038 PERIODIC REVIEW REPORT Drawing Title: Project Locus Map	Project No.: 4884S-13 FIGURE 1



Last Date Saved: 08 Feb 2019 Document Path: E:\GIS Mapping\4884S-13Solepo211FranklinPeriodic Reivew Report\4884S - 05 - Indoor Air 2018-2019 PRR.mxd

DESIGNED BY	DRAWN BY	SCALE	DATE
RLK	CAH	AS NOTED	02-2019

DATE DRAWN	DATE ISSUED
02-2019	02-08-2019

DAY ENVIRONMENTAL, INC.
Environmental Consultants
Rochester, New York 14606
New York, New York 10170

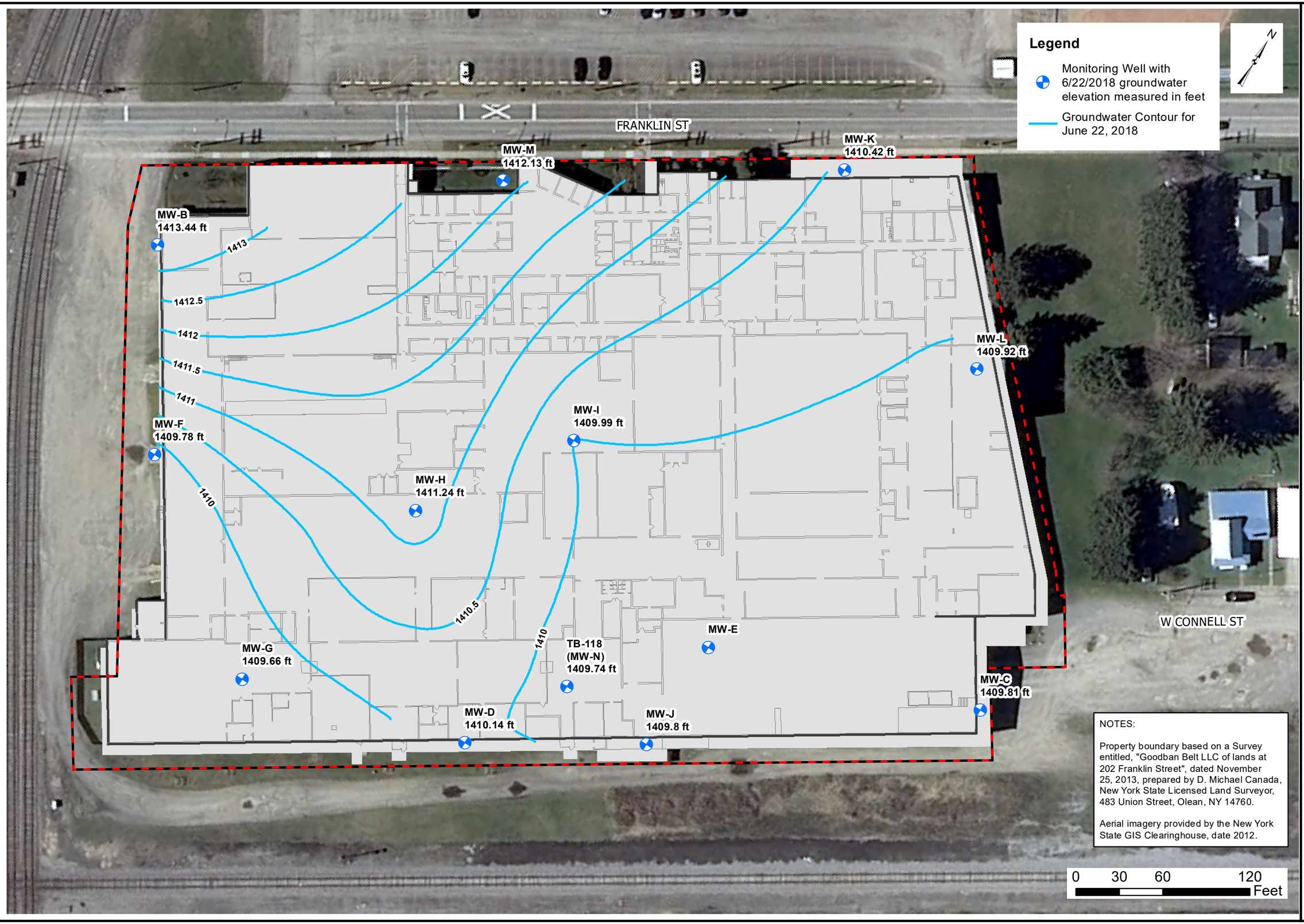
Project Title
211 FRANKLIN STREET
OLEAN, NEW YORK

BCP SITE NO. C905038 PERIODIC REVIEW REPORT

Drawing Title
Site Plan Showing Periodic Indoor Air Sample Areas

Project No.
4884S-13

FIGURE 2



NOTES:

Property boundary based on a Survey entitled, "Goodban Belt LLC of lands at 202 Franklin Street", dated November 25, 2013, prepared by D. Michael Canada, New York State Licensed Land Surveyor, 483 Union Street, Olean, NY 14760.

Aerial imagery provided by the New York State GIS Clearinghouse, date 2012.

DESIGNED BY	RLK	DATE	02-2019
DRAWN BY	CAH/CPS	DATE DRAWN	02-2019
SCALE	AS NOTED	DATE ISSUED	02-13-2019

day
DAY ENVIRONMENTAL, INC.
Environmental Consultants
Rochester, New York 14606
New York, New York 10170

Project Title
211 FRANKLIN STREET
OLEAN, NEW YORK

BCP SITE NO. C905038 REMEDIAL INVESTIGATION

Drawing Title
Groundwater Contour Map: June 22, 2018

Project No.
4884S-13

FIGURE 3

Last Date Saved: 13 Feb 2019 Document Path: E:\GIS Mapping\4884S-13Solepa211Franklin\Periodic Review Report\4884S - 06 - GW Contour 20180622.mxd

TABLES

TABLE 1
211 FRANKLIN STREET
OLEAN, NEW YORK
BCP SITE NO. C905038

SUMMARY OF VOLATILE ORGANIC COMPOUNDS
INDOOR AIR AND BACKGROUND AIR SAMPLES COLLECTED MARCH 2016, MARCH 2017 AND MARCH 2018

Detected Constituent	Indoor Air Reference Value (ug/m^3)[1]	OSHA PEL (ppb)[5]	Sample Designation and Date																															
			Area 1			Area 2			Area 3			Area 4			Area 5			Area 6			Outdoor Background		
			3/22/2016	3/24/2017	3/23/2018	3/23/2016	3/24/2017	3/23/2018	3/22/2016	3/24/2017	3/23/2018	3/22/2016	3/24/2017	3/23/2018	3/22/2016	3/24/2017	3/23/2018	3/22/2016	3/24/2017	3/23/2018	3/22/2016	3/24/2017	3/23/2018
1-4, Dioxane	NA	100,000	U	U	U	U	U	U	U	U	U	U	U	U	3.48	U	U	U	U	U	U	U	U	U	U	U
1,1,1-Trichloroethane	20.6	350,000	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,1-Dichloroethane	0.7	100,000	U	U	U	U	U	U	U	U	U	U	U	U J	U	U	U	U	0.09	U	U	U	U	U	U	U
1,1-Dichloroethene	1.4	NA	U	U	U	U	U	U		U	U	U	U	U	U	U	U	U	0.10	U	U	U	U	U	U	U
1,1,2-Trichlorotrifluoroethane	NA	1,000,000	U	0.80	U	U	0.65 J	U	U	0.78	U	U	0.58 J	1.00	U	0.61 J	U	0.120	0.76 J	0.77	U	0.84	U	U	U	U
1,2,4-Trichlorobenzene	6.8	NA	U	U	U	U	2.56	U	U	2.72 J	U	U	U	U	U	2.66	U	U	3.80	U	U	U J	U	U	U	U
1,2,4-Trimethylbenzene	9.5	NA	U	7.37	0.62	0.150	**13.13**	0.45 J	U	7.37	6.19	0.190	U	5.36	U	U	2.62	U	3.03	2.41	U	U	U	U	U	U
1,3,5-Trimethylbenzene	3.7	NA	U	1.96	U	U	3.45	0.25 J	U	1.69	1.5	0.100	1.37	1.2	U	0.75	0.98	U	0.87	0.83	U	U	U	U	U	U
1,3-Butadiene	3.0	1,000	U	U	U	U	U	U	U	**8.64**	**6.23**	U	U	U J	U	U	U J	U	U	U J	U	U	U J	U	U	U J
2-Butanone (MEK)	12	200,000	1.32	4.45	U	0.930	4.84	5.37	1.68	6.99	7.52	3.44	**12.74**	**21.2**	1.36	3.30	**22.82**	0.470	3.36	**19.82**	0.400	2.12	U J	U	U	U J
2-Hexanone (MBK)	NA	100,000	U	U J	U	U	U	U	U	U J	U	U	U	U	3.16	U	U	0.260	U	U	U	U J	U	U	U J	U
4-Ethyltoluene	3.6	NA	U	1.38 J	U	U	2.35	0.21 J	U	2.00 J	1.62	U	1.06	1.21	U	0.44 J	0.89	U	0.67	0.81	U	U	U J	U	U	U
4-Isopropyltoluene	NA	NA	U	1.08	U	U	U	U	U	U	U	U	1.01 J	U	U	0.6 J	0.46 J	U	1.02 J	U	U	U	U	U	U	U
4-Methyl-2-Pentanone (MIBK)	6	100,000	1.61	2.40	1.11	0.970	1.77	2.03	4.80	5.41	**28.48**	**6.02**	5.86	**18.11**	4.75	2.46	4.96	0.170	**15.45**	**27.38**	U	U	U	U	U	U
Acetone	98.9	1,000,000	48.20 D	**221.94 D**	52.28 D	**388 D**	**472.88 D**	91.96 D	56.6 D	**710.51 D**	**134.26 D**	**118.00 D**	**311.29 D**	**122.62 D**	59.0 D	**299.4 D**	**556.05 D**	5.66	**403.97 D**	**468.13 D**	5.08	17.04	8.27	U	U	U
Benzene	9.4	10,000	1.14	2.10	1.32	0.670	1.16	2.09	1.55	**12.38**	**18.95**	1.57	6.25	**12.22**	0.360	1.96	1.38	0.130	2.61	1.82	0.130	0.99	0.47	U	U	U
Bromodichloromethane	NA	NA	U	NT	U	U	NT	U	U	NT	U	U	NT	U	U	NT	U	0.110	NT	U	U	NT	U	U	U	U
Carbon Disulfide	4.2	20,000	U	U	U	U	U	U	U	U	U	U	0.54 J	0.56 J	U	U	U	U	U	U	U	U	U	U	U	U
Carbon Tetrachloride	1.3	10,000	0.08	0.76	0.2	0.16	1.02	0.18	0.09	0.48	0.19	0.11	0.49	0.2	0.12	0.51	0.18	0.11	0.64	0.19	0.08	0.75	0.17	U	U	U
Chloroform	1.1	50,000 *c	U	U	U	0.16	U	U	U	0.81	U	U	0.6	0.35 J	0.22	0.95	**5.99**	0.99	0.66	**1.25**	U	U	U	U	U	U
Chloromethane	3.7	100,000	U	1.99	U	U	1.75 J	U	U	2.17	U	U	U J	U	U	1.85 J	U	U	1.70 J	U	U	1.91	U	U	U	U
Cyclohexane	NA	300,000	U	U	U	0.25	U	U	0.19	U	2.11	0.23	0.66	1.82	U	U	0.5	U	1.14	1.41	U	U	U J	U	U	U
Dichlorodifluoromethane	16.5	1,000,000	0.84	3.59	U	0.83	2.75	3.51	0.89	3.40	U	0.78	2.27	U J	0.79	2.71	3.33	0.97	3.14	3.68	0.93	3.41	3.09	U	U	U
Ethanol	210	1,000,000	60.20 D	124.06 D	**245.11 D**	36.6 D	152.5 D	**331.84 D**	17.0 D	142.2 D	**452.52 D**	93.60 D	137.07 D	**390.29 D**	8.91	50.91 D	192.32 D	2.26	69.39 D	**693.86 D**	2.12	7.79	13.88	U	U	U
Ethyl acetate	5.4	400,000	U	0.85 J	U	U	0.48	U	U	0.84 J	**7.75**	U	0.57	U	1.54	0.72	U	U	0.90	U	0.65	0.42 J	U	U	U	U
Ethylbenzene	5.7	100,000	U	0.63 J	U	0.12	0.47	0.43	0.13	2.15 J	2.33	0.29	1.99	2.41	0.50	0.52	2.1	U	0.73	1.74	U	U J	U	U	U	U
Hexane	10.2	500,000	U	1.18 J	0.85 JH	1.74	1.40 J	U	U	2.28	4.83	1.35	3.41	U J	U	1.43 J	U J	U	0.71 J	1.05 J	U	0.78 J	U J	U	U	U
Isopropyl alcohol	NA	400,000	6.16	16.81	10.36	26.0 D	20.5	13.74	4.23	24.15	24.29	10.60 D	40.25 D	24.22	5.03	7.26	18.26	0.85	4.79	48.1 D	0.54	0.75	U	U	U	U
Isopropylbenzene	NA	50,000	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
m/p-Xylene	22.2	100,000	0.20	2.54	0.97	0.53	2.10	1.66	0.510	7.89	9.88	1.16	7.67	10.58	1.62	1.78	8.24	U	2.84	7.07	U	U	U	U	U	U
Methylene Chloride	60[2]	25,000	0.34	5.94 J	2.43	1.03	7.26	4.27	0.36	4.55 J	2.25	0.38	2.23	2.93	0.34	23.40	U	0.14	2.39	1.59	0.25	4.51 J	U	U	U	U
Methyl tert-Butyl Ether (MTBE)	11.5	NA	U	U J	U	U	U	U	U	U J	U	U	U	U J	U	U	U J	U	U	U J	U	U J	U J	U	U	U
Naphthalene	5.1	10,000	U	4.23 J	U	U	**8.48**	U	U	**17.22** J	**15.5**	0.71	**8.53**	U	1.32	3.98	0.95 J	U	**10.89**	1.6	U	4.46 J	U	U	U	U
n-Butylbenzene	NA	NA	U	U	U	U	U	U	U	U	1.54	U	U	1.45	U	0.81	U	U	1.18	U	U	U	U	U	U	U
n-Heptane	NA	500,000	0.19	2.40	U	0.24	2.12	U	0.22	9.51	10.9	0.52	5.25	9.14	U	2.60	6.52	U	3.1	21.35	U	0.67	U	U	U	U
o-Xylene	7.9	100,000	U	1.65 J	0.34	0.14	2.26	0.52	0.11	2.96 J	3.13	0.24	2.69	3.36	0.27	0.70	2.61	U	1.09	2.42	U	U J	U	U	U	U
Propene	NA	NA	U	U	U	U	U	U	U	22.20 D	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
sec-Butylbenzene	NA	NA	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Styrene	1.9	100,000	U	0.37 J	U	U	U	U	U	1.64 J	0.3 J	U	0.66	U	U	U	U	U	0.51	0.28	U	U J	U	U	U	U
Tetrachloroethene	30[3]	100,000	U	0.52	1.44 J	U	9.09	0.17	U	0.42	0.09 J	U	0.44	0.26	U	2.09	0.03 J	U	0.59	0.08	U	0.98	0.03 J	U	U	U
Tetrahydrofuran	NA	200,000	U	U	U	U	U	U	U	0.48	U	U	0.41	U	U	U	U	U	U	U	U	1.14	U	U	U	U
Toluene	43	200,000	1.39	5.34 J	2.59	0.78	2.84	3.38	2.55	21.52 J	37.44	4.23	17.05	33.79	0.80	6.21	**78.27 D**	U	8.58	**127.93 D**	U	0.81 J	U	U	U	U
trans-1,2-Dichloroethene	NA	200,000	U	U	U	U	0.400	U	U	0.55	1.61	U	0.49	1.53	U	U	U	U	U	U	U	U	U	U	U	U
Trichloroethene	2[4]	100,000	U	0.16	U	U	0.33	0.1 J	U	0.16	0.11	U	0.24	U	0.05	0.13	U	U	0.22	U	U	0.60	U	U	U	U
Trichlorofluoromethane	18.1	1,000,000	7.97	**33.66**	**32.54**	5.09	11.46	**32.26**	5.72	**37.37**	**34.22**	8.20 D	**21.69**	**34.17**	2.15	7.92	14.44	0.40	9.44	17.93	0.35	2.06	1.82	U	U	U
Total VOCs			*129.64*	*450.16*	*352.16*	*464.39*	*730.03*	*494.42*	*96.63*	*1063.41*	*815.74*	*251.72*	*595.36*	*699.98*	*95.77*	*428.67*	*923.90*	*12.64*	*560.36*	*1453.50*	*10.53*	*52.03*	*27.73*			

NOTES

Volatile organic compound (VOC) concentrations are presented in micrograms per cubic meter ($\mu g/m^3$).
No NYSDOH criteria is available for soil vapor samples

U = Not detected at concentration above analytical laboratory reporting limit. Refer to the analytical laboratory report for the associated reporting limit.

NA = Not Available. J = Estimated Value. NT = Not Tested D = Sample Diluted.

[1] Unless otherwise noted the Indoor Air Reference Value shown is the 90th percentile referenced in Table C2 of the NYSDOH document titled "Final Guidance for Evaluating Soil Vapor Intrusion in the State of New York" dated October 2006.

[2] NYSDOH derived air guidance values in NYSDOH document titled "Final Guidance for Evaluating Soil Vapor Intrusion in the State of New York" dated October 2006.

[3] Guidance value identified in NYSDOH September 2013 Fact Sheet "Tetrachloroethene (PERC) in Indoor and Outdoor Air".

[4] Guidance value identified in NYSDOH August 2015 Fact Sheet "Trichloroethene (TCE) in Indoor and Outdoor Air".

[5] Permissable Exposure Limit (PEL) in parts per billion (ppb) as listed in Tables Z-1 and Z-2 of the United States Department of Labor Occupational Safety and Health (OSHA) Standard Number: 29 CFR 1910.1000 and/or in the National Institute for Occupational Safety and Health (NIOSH) Pocket Guide to Chemical Hazards.

*c - indicates that the PEL is a ceiling limit

Highlighted value exceeds the Indoor Air Reference Value

TABLE 2
211 FRANKLIN STREET
OLEAN, NEW YORK
BCP SITE NO. C905038

DETECTED VOLATILE ORGANIC COMPOUNDS (VOCS) IN GROUNDWATER SAMPLES

Contaminant	Groundwater Standard or Guidance Value	MW-B						MW-C					MW-D					MW-E				
		7/9/2014	7/31/2014	9/30/2014	3/22/2016	6/29/2016	9/27/2016	7/10/2014	9/29/2014	3/22/2016	6/29/2016	9/27/2016	7/9/2014	9/29/2014	3/22/2016	6/29/2016	9/27/2016	7/9/2014	9/29/2014	3/23/2016	6/29/2016	9/27/2016
Acetone	50	U	U	U	U	U	U	U	U	U	U	14.8	U	U	U	U	6.0 J	U	U	U	U	3.9 J
2-Butanone (MEK)	50	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Bromodichloromethane	50	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Chloroform	7	U	U	U	U	U	U	U	U	3.5 J	3.4 J	2.8	U	U	U	U	U	U	U	U	U	U
Chloromethane	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Dibromochloromethane	50	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Naphthalene	10	4.5 J	U	U	U	U	NT	U	U	U	U	NT	2.9 J	U	U	U	NT	U	U	U	U	NT
Methyl acetate	NA	NT	NT	U	U	U	1.5 J	NT	U	U	U	U	NT	U	U	U	U	NT	U	U	U	U
Methylcyclohexane	NA	NT	NT	2.7 J	U	U	U	NT	U	U	U	U	NT	U	U	U	U	NT	U	U	U	U
Methylene chloride	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
n-Propylbenzene	5	0.99 J	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U	NT	NT	NT
sec-Butylbenzene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
tert-Butyl Alcohol	NA	U	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U	NT	NT	NT
tert-Butylbenzene	5	2.8 J	2.7 J	U	NT	NT	NT	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U	NT	NT	NT
1,2,4-Trimethylbenzene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Toluene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Total VOCs		8.29	2.7	2.7	U	U	6.8	U	U	3.5	3.4	17.6	2.9	U	U	U	6.0	U	U	U	U	3.9
Total TICs		175	140	75	90.5	11	9.1	U	U	U	U	U	26	U	U	U	5.0	23	U	U	U	U
Total VOCs and TICs		183.29	142.7	77.7	90.5	11	15.9	U	U	3.5	3.4	17.6	28.9	U	U	U	11	23	U	U	U	3.9

Contaminant	Groundwater Standard or Guidance Value	MW-F							MW-G					MW-H					MW-I						
		7/9/2014	9/30/2014	3/23/2016	6/29/2016	9/27/2016	6/21/2017	6/22/2018	7/7/2014	9/30/2014	3/23/2016	6/29/2016	9/27/2016	7/8/2014	9/29/2014	3/23/2016	6/29/2016	9/27/2016	7/8/2014	9/30/2014	3/23/2016	6/29/2016	9/27/2016	6/21/2017	6/22/2018
Acetone	50	U	U	U	U	10.6	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	28.0	U	U
2-Butanone (MEK)	50	U	U	U	U	U	U	UJ	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	UJ
Bromodichloromethane	50	U	U	U	U	U	U	1.33	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Chloroform	7	U	U	U	U	U	U	20.5 *	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	UJ
Chloromethane	5	U	U	U	U	U	U	U	U	U	U	U	0.6 J	U	U	U	U	0.6 J	U	U	U	U	0.6 J	U	UJ
Dibromochloromethane	50	U	U	U	U	U	U	0.44 J	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Naphthalene	10	U	U	U	U	NT	U	U	U	U	U	U	NT	U	U	U	U	NT	U	U	U	U	NT	U	U
Methyl acetate	NA	NT	U	U	U	U	NT	NT	NT	U	U	U	2.0 J	NT	U	U	U	U	NT	U	U	U	U	NT	NT
Methylcyclohexane	NA	NT	U	U	U	U	NT	NT	NT	U	U	U	UJ	NT	U	U	U	U	NT	U	U	U	U	NT	NT
Methylene chloride	5	U	U	U	U	U	U	0.80 J	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	UJ
n-Propylbenzene	5	U	U	NT	NT	NT	U	U	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U
sec-Butylbenzene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
tert-Butyl Alcohol	NA	U	U	NT	NT	NT	U	U	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U
tert-Butylbenzene	5	U	U	NT	NT	NT	0.47	U	3.9 J	U	NT	NT	NT	3.9 J	U	NT	NT	NT	2.5 J	U	NT	NT	NT	1.46	2.91
1,2,4-Trimethylbenzene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Toluene	5	U	U	U	U	U	U	U	U	U	U	UJ	U	U	U	U	U	U	U	U	U	U	U	U	U
Total VOCs		U	U	U	U	10.6	0.47	23.07	3.9	U	U	U	2.6	3.9	U	U	U	0.6	2.5	U	U	U	28.6	2.28	2.91
Total TICs		23	7.1	U	U	U	U	U	108	212.1	83.3	31.4	43.1	91	83.1	33.2	17.7	U	U	11.6	U	U	5.8	U	U
Total VOCs and TICs		23	7.1	U	U	10.6	0.47	23.07	111.9	212.1	83.3	31.4	45.7	94.9	83.1	33.2	17.7	0.6	2.5	11.6	U	U	34.4	2.28	2.91

Contaminant	Groundwater Standard or Guidance Value	MW-J							MW-K					MW-L						
		7/10/2014	9/29/2014	3/22/2016	6/29/2016	9/27/2016	6/21/2017	6/22/2018	7/10/2014	9/30/2014	3/22/2016	6/29/2016	9/27/2016	7/7/2014	9/30/2014	3/23/2016	6/29/2016	9/27/2016	6/21/2017	6/22/2018
Acetone	50	U	U	U	U	7.8 J	U	U	U	U	U	U	U	U	U	U	U	5.2 J	1.78 J	U
2-Butanone (MEK)	50	U	U	U	U	U	U	UJ	U	U	U	U	U	U	U	U	U	U	U	UJ
Bromodichloromethane	50	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Chloroform	7	U	U	U	U	U	U	U	U	U	U	U	U	0.65 J	U	U	U	U	U	U
Chloromethane	5	U	U	U	U	0.5 J	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Dibromochloromethane	50	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Naphthalene	10	U	U	U	U	NT	U	U	U	U	U	U	NT	U	U	U	U	NT	U	U
Methyl acetate	NA	NT	U	U	U	U	NT	NT	NT	U	U	U	U	NT	U	U	U	U	NT	NT
Methylcyclohexane	NA	NT	U	U	U	U	NT	NT	NT	U	U	U	U	NT	U	U	U	U	NT	NT
Methylene chloride	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
n-Propylbenzene	5	U	U	NT	NT	NT	U	U	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U
sec-Butylbenzene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
tert-Butyl Alcohol	NA	U	U	NT	NT	NT	U	U	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U
tert-Butylbenzene	5	U	U	NT	NT	NT	U	U	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U
1,2,4-Trimethylbenzene	5	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Toluene	5	U	U	U	U	U	U	U	U	U	U	U	U	0.74 J	U	U	U	U	U	U
Total VOCs		U	U	U	U	8.3	U	U	U	U	U	U	U	1.39	U	U	0	5.2	1.78	U
Total TICs		U	U	U	U	U	U	U	U	U	U	U	U	27.7	U	U	U	U	U	U
Total VOCs and TICs		U	U	U	U	8.3	U	U	U	U	U	U	U	29.09	U	U	0	5.2	1.78	U

Contaminant	Groundwater Standard or Guidance Value	MW-M							MW-N					Production Well
		7/9/2014	9/30/2014	3/22/2016	6/29/2016	9/27/2016	6/21/2017	6/22/2018	7/7/2014	9/29/2014	3/23/2016	6/29/2016	9/27/2016	9/30/2014
Acetone	50	U	U	U	U	4.9 J	U	U	U	U	U	U	6.1 J	U
2-Butanone (MEK)	50	U	U	U	U	1.5 J	U	UJ	U	U	U	U	U	U
Bromodichloromethane	50	U	U	U	U	U	U	U	U	U	U	U	U	U
Chloroform	7	U	U	U	U	U	U	0.40 J	U	U	U	U	U	U
Chloromethane	5	U	U	U	U	U	U	UJ	U	U	U	U	0.7 J	U
Dibromochloromethane	50	U	U	U	U	U	U	U	U	U	U	U	U	U
Naphthalene	10	U	U	U	U	NT	U	U	U	U	U	U	NT	U
Methyl acetate	NA	NT	U	U	U	1.4 J	NT	NT	NT	U	U	U	U	U
Methylcyclohexane	NA	NT	U	U	U	UJ	U	NT	NT	U	U	U	UJ	U
Methylene chloride	5	U	U	U	U	U	U	U	U	U	U	U	U	U
n-Propylbenzene	5	U	U	NT	NT	NT	U	U	U	U	NT	NT	NT	U
sec-Butylbenzene	5	U	U	U	U	U	0.37 J	U	U	U	U	U	U	U
tert-Butyl Alcohol	NA	4.5 J	U	NT	NT	NT	U	U	U	U	NT	NT	NT	U
tert-Butylbenzene	5	3.6 J	U	NT	NT	NT	2.39	U	U	U	NT	NT	NT	U
1,2,4-Trimethylbenzene	5	U	U	U	U	U	U	U	U	U	U	U	U	U
Toluene	5	U	U	U	UJ	U	U	U	U	U	U	UJ	U	U
Total VOCs		8.1	U	U	U	7.8	2.76	0.4	U	U	U	U	6.8	U
Total TICs		130	22	U	U	U	U	U	87	5.1	U	U	U	U
Total VOCs and TICs		138.1	22	U	U	7.8	2.76	0.40	87	5.1	U	U	6.8	U

Notes

Groundwater Standards or Guidance Values as referenced in New York State Department of Environmental Conservation (NYSDEC) Technical and Guidance Series (TOGS) 1.1.1 dated June 1998 as amended by the NYSDEC's supplemental table dated April 2000.

Test results and groundwater standards or guidance values reported in µg/L = micrograms per Liter or parts per billion (ppb).

VOC = Volatile Organic Compound TIC = Tentatively Identified Compound

U = The analyte was analyzed for, but was not detected above the associated reported quantitation limit. Refer to the analytical laboratory report for the associated reported quantitation limit

J = indicates a concentration below the reporting limit and equal to or above the detection limit, and is considered an estimated concentation

NA = Not Available NT = Not Tested

* = Exceeds Groundwater Standard or Guidance Value

TABLE 3
211 FRANKLIN STREET
OLEAN, NEW YORK
BCP SITE NO. C905038

DETECTED SEMI-VOLATILE ORGANIC COMPOUNDS (SVOCS) IN GROUNDWATER SAMPLES

Contaminant	Groundwater Standard or Guidance Value	MW-B					MW-C					MW-D					MW-E				
		7/9/2014	9/30/2014	3/22/2016	6/29/2016	9/27/2016	7/10/2014	9/29/2014	3/22/2016	6/29/2016	9/27/2016	7/9/2014	9/29/2014	3/22/2016	6/29/2016	9/27/2016	7/9/2014	9/29/2014	3/23/2016	6/29/2016	9/27/2016
1-Methylnaphthalene	NA	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U	NT	NT	NT
Benzoic acid	NA	U	NT	NT	NT	NT	U	NT	NT	NT	NT	U	NT	NT	NT	NT	U	NT	NT	NT	NT
Butylbenzylphthalate	50	U	U	U	U	UJ	U	U	U	U	U	U	U	U	U	UJ	U	U	1.4 J	U	U
Bis (2-ethylhexyl) phthalate	5	U	U	U	U	UJ	U	U	2.1 J	23 *	U	U	U	1.9 J	5.1 J *	UJ	U	U	U	4.9 J	U
Caprolactam	NA	NT	U	U	U	U	NT	U	U	U	U	NT	U	U	U	UJ	NT	U	U	U	U
Di-n-butylphthalate	50	U	U	U	U	U	U	U	U	U	U	U	U	U	U	UJ	U	U	U	U	U
Di-n-octyl phthalate	50	U	U	U	U	U	U	U	U	U		U	U	U	U	UJ	U	U	U	U	U
Fluorene	50	1.3 J	U	U	U	U	U	U	U	U	U	U	U	U	U	UJ	U	U	U	U	U
Total SVOCs		1.3	U	U	U	U	U	U	2.1	23	U	U	U	1.9	5.1	U	U	U	1.4	4.9	U
Total TICs		154	236.4	530	945	40.1	39.8	4.8	24.6	16.8	U	19.1	8.5	50.3	89.3	U	22	U	192.3	27.6	U
Total SVOCs and TICs		155.3	236.4	530	945	40.1	39.8	4.8	26.7	39.8	U	19.1	8.5	52.2	94.4	U	22	U	193.7	32.5	U

Contaminant	Groundwater Standard or Guidance Value	MW-F							MW-G					MW-H					MW-I						
		7/9/2014	9/30/2014	3/23/2016	6/29/2016	9/27/2016	6/21/2017	6/22/2018	7/7/2014	9/30/2014	3/23/2016	6/29/2016	9/27/2016	7/8/2014	9/29/2014	3/23/2016	6/29/2016	9/27/2016	7/8/2014	9/30/2014	3/23/2016	6/29/2016	9/27/2016	6/21/2017	6/22/2018
1-Methylnaphthalene	NA	U	U	NT	NT	NT	NT	NT	U	U	NT	NT	NT	U	U	NT	NT	NT	U	U	NT	NT	NT	NT	NT
Benzoic acid	NA	U	NT	NT	NT	NT	U	U	U	NT	NT	NT	NT	U	NT	NT	NT	NT	U	NT	NT	NT	NT	U	U
Butylbenzylphthalate	50	U	U	U	U	UJ	U	U	U	U	U	U	U	U	U	U	U	UJ	U	U	U	U	UJ	U	UJ
Bis (2-ethylhexyl) phthalate	5	U	U	2.8 J	11 *	UJ	202 JH *	1.08 J	U	U	U	U	U	U	U	U	U	UJ	U	U	6.3 J *	5.1 J *	UJ	U	UJ
Caprolactam	NA	NT	U	U	U	U	NT	NT	NT	U	U	U	U	NT	U	U	U	U	NT	U	U	U	U	NT	NT
Di-n-butylphthalate	50	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Di-n-octyl phthalate	50	U	U	U	U	U	27.8 JH	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Fluorene	50	U	U	U	U	U	U	UJ	U	U	U	U	U	1.1 J	U	U	U	U	U	U	U	U	U	U	UJ
Total SVOCs		U	U	2.8	11	U	229.8	1.08	U	U	U	U	U	1.1	U	U	U	U	U	U	6.3	5.1	U	U	U
Total TICs		11	19.5	77.5	346	U	5.2	35 JH	35.1	136.8	614	1089	112.8	171.6	111.8	758	688.4	447.5	18.2	16.6	24.9	531	9.7	4.5	17.3
Total SVOCs and TICs		11	19.5	80.3	357	U	235.0	1.1	35.1	136.8	614	1089	112.8	172.7	111.8	758	688.4	447.5	18.2	16.6	31.2	536.1	9.7	4.5	17.3

Contaminant	Groundwater Standard or Guidance Value	MW-J							MW-K					MW-L						
		7/10/2014	9/29/2014	3/22/2016	6/29/2016	9/27/2016	6/21/2017	6/22/2018	7/10/2014	9/30/2014	3/22/2016	6/29/2016	9/27/2016	7/7/2014	9/30/2014	3/23/2016	6/29/2016	9/27/2016	6/21/2017	6/22/2018
1-Methylnaphthalene	NA	U	U	NT	NT	NT	NT	NT	U	U	NT	NT	NT	U	U	NT	NT	NT	NT	NT
Benzoic acid	NA	U	NT	NT	NT	NT	U	U	U	NT	NT	NT	NT	U	NT	NT	NT	NT	U	U
Butylbenzylphthalate	50	U	U	U	U	UJ	U	UJ	U	U	U	U	UJ	U	U	U	U	U	U	U
Bis (2-ethylhexyl) phthalate	5	U	U	100 J *	22 *	UJ	U	UJ	U	U	1.6 J	5.2 J *	UJ	U	U	4.3 J	U	U	6.79 JH *	U
Caprolactam	NA	NT	U	U	U	U	NT	NT	NT	U	U	U	U	NT	U	U	U	U	NT	NT
Di-n-butylphthalate	50	U	U	U	U	U	U	U	U	U	U	U	U	1 J	U	U	U	U	U	U
Di-n-octyl phthalate	50	U	U	U	U	U	U	6.87 JH	U	U	U	U	U	U	U	U	U	U	U	U
Fluorene	50	U	U	U	U	U	U	UJ	U	U	U	U	U	U	U	U	U	U	U	UJ
Total SVOCs		U	U	100	22	U	0	6.87	U	U	1.6	5.2	U	1	U	4.3	U	U	6.79	0.84
Total TICs		U	11.3	U	99.7	U	U	17.4	52	72	62.7	145.3	U	4.9	4.2	20.6	74.6	U	U	22
Total SVOCs and TICs		U	11.3	100	121.7	U	0	24.3	52	72	64.3	150.5	U	5.9	4.2	24.9	74.6	U	6.79	22.8

Contaminant	Groundwater Standard or Guidance Value	MW-M							MW-N					Production Well
		7/9/2014	9/30/2014	3/22/2016	6/29/2016	9/27/2016	6/21/2017	6/21/2018	7/7/2014	9/29/2014	3/23/2016	6/29/2016	9/27/2016	9/30/2014
1-Methylnaphthalene	NA	2.1 J	U	NT	NT	NT	NT	NT	U	U	NT	NT	NT	U
Benzoic acid	NA	U	NT	NT	NT	NT	NT	0.86 J	U	NT	NT	NT	NT	U
Butylbenzylphthalate	50	U	U	1.1 J	U	UJ	U	U	U	U	U	U	UJ	U
Bis (2-ethylhexyl) phthalate	5	U	U	4.3 J	U	UJ	U	U	U	U	U	U	UJ	U
Caprolactam	NA	NT	U	U	4.7 J	U	NT	NT	NT	U	U	5.3 J	U	U
Di-n-butylphthalate	50	U	U	1.3 J	U	U	U	U	U	U	U	U	U	U
Di-n-octyl phthalate	50	U	U	U	U	U	U	U	U	U	U	U	U	U
Fluorene	50	U	U	U	U	U	U	U	U	U	U	U	U	U
Total SVOCs		2.1	U	6.9	4.7	U	0.86	U	U	U	U	5.3	U	U
Total TICs		26.6	49.6	28.6	302.9	298.8	U	20.6	79	22.9	49.4	113.5	U	U
Total SVOCs and TICs		28.7	49.6	35.5	307.6	298.8	0.86	20.6	79	22.9	49.4	118.8	U	U

Notes

Groundwater Standards or Guidance Values as referenced in New York State Department of Environmental Conservation (NYSDEC) Technical and Guidance Series (TOGS) 1.1.1 dated June 1998 as amended by the NYSDEC's supplemental table dated April 2000.

Test results and groundwater standards or guidance values reported in µg/L = micrograms per Liter or parts per billion (ppb).

SVOC = Semi-Volatile Organic Compound TIC = Tentatively Identified Compound

U = The analyte was analyzed for, but was not detected above the associated reported quantitation limit. Refer to the analytical laboratory report for the associated reported quantitation limit
J = indicates a concentration below the reporting limit and equal to or above the detection limit, and is considered an estimated concentation

JH = Data Validation indicated the concentration estimated by the analytical laboratory is biased high

NA = Not Available NT = Not Tested

* = Exceeds Groundwater Standard or Guidance Value

TABLE 4
211 FRANKLIN STREET
OLEAN, NEW YORK
BCP SITE NO. C905038

DETECTED TAL METALS IN GROUNDWATER SAMPLES

Contaminant	Groundwater Standard or Guidance Value	MW-B					MW-C					MW-D					MW-E				
		7/9/2014	9/30/2014	3/22/2016	6/29/2016	9/27/2016	7/10/2014	9/29/2014	3/22/2016	6/29/2016	9/27/2016	7/9/2014	9/29/2014	3/22/2016	6/29/2016	9/27/2016	7/9/2014	9/29/2014	3/23/2016	6/29/2016	9/27/2016
Aluminum	NA	U	66.2 J	U	U	U	U	1220.0	18.1 J	U	U	U	U	U	U	U	U	U	U	690.0 JH	38.4 J
Antimony	3	U	U	U	15.5 JH *	U	U	U	U	8.4 JH *	U	U	U	U	13.3 JH *	U	U	U	5.2 J *	11.3 JH *	U
Arsenic	25	U	U	U	9.7 J	U	U	5.1 J	4.0 J	9.1 J	U	U	U	U	12.0 J	U	U	U	U	9.7 J	U
Barium	1,000	616	200	684	143 JH	670 JH	219	221	164 J	146 JH	166 JH	259	200 J	231	248 JH	345 JH	207	223	232	253 JH	219 JH
Calcium	NA	293,000	300,000	358,000	330,000 JH	309,000 JH	114,000	114,000	92,100	79,700 JH	88,500 JH	153,000	133,000	141,000	132,000 JH	249,000 JH	124,000	134,000	14,200	145,000 JH	130,000 JH
Chromium	50	0.86 J	U	0.98 J	3.70 JH	56.20 *	U	1.8 J	0.85 J	2.80 JH	U	U	U	0.46 J	3.20 JH	1.70 J	0.9 J	3.5 J	1.60 J	4.70 JH	U
Cobalt	NA	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	0.81 JH	U
Copper	200	U	U	1.40 J	1.80 JH	4.0 J	U	4.5 J	U	1.70 JH	U	U	U	U	1.70 JH	U	U	U	1.40 J	5.40 JH	U
Iron	300	156 J	92.4 J	2090.0 *	631.0 *	552 *	U	1510 *	63.5 J	U	13.5 J	663 *	376 *	84.1 J	104.0 J	142	110 J	84 J	161.0 J	1140.0 *	73.8
Lead	25	U	U	U	7.2 J	U	U	U	U	U	U	U	U	U	U	U	U	U	U	4.8 J	U
Magnesium	35,000	20,500	15,700	25,900	19,200 JH	22,300 JH	18,100	18,900	14,600	13,300 JH	14,500 JH	23,600	20,400	22,100	21,300 JH	37,600 JH *	21,000	22,500	24,600	25,500 JH	22,900 JH
Manganese	300	1,480 *	2,800 *	2,090 *	2,560 JH *	1,650 *	U	122	2.2 J	1.3 JH	U	752 *	619 *	501 *	577 JH *	1,610 *	U	U	5.6 J	75.7 JH	8.2
Mercury	0.7	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Nickel	100	U	U	2.9 J	3.7 J	20.2	U	1.5 J	1.5 J	2.1 J	U	U	U	1.9 J	3.2 J	U	U	U	1.5 J	4.3 J	U
Potassium	NA	6,730 E	6,240	7,960	6,240	7,090	3,660	4,510	3,460	2,820	3,100	5,130 E	5,200	5,100	4,880	5,960	3,770 E	3,840	4,260	4,040	3,320
Selenium	10	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Sodium	20,000	352,000 *	184,000 *	435,000 *	236,000 JH *	320,000 *	128,000 *	131,000 *	94,300 *	76,600 JH *	85,000 *	116,000 *	126,000 *	2.80 J *	3.50 J *	U	7.1 J *	U	U	3.40 J *	U
Thallium	0.5	7.6 J *	U	U	12.20 J *	U	U	U	U	U	U	U	U	117,000 *	113,000 JH *	146,000 *	125,000 *	125,000 *	132,000 *	130,000 JH *	125,000 *
Vanadium	NA	1.6 J	U	U	0.38 JH	U	U	2.0 J	U	U	U	U	U	U	U	U	U	U	U	0.39 JH	U
Zinc	2,000	6.3 J	U	36.6 J	U	U	6.2 J	10.9 J	11.5 J	U	U	U	U	11.6 J	U	U	U	U	9.8 J	8.7 J	U

Contaminant	Groundwater Standard or Guidance Value	MW-F							MW-G					MW-H					MW-I						
		7/9/2014	9/30/2014	3/23/2016	6/29/2016	9/27/2016	6/21/2017	6/22/2018	7/7/2014	9/30/2014	3/23/2016	6/29/2016	9/27/2016	7/8/2014	9/29/2014	3/23/2016	6/29/2016	9/27/2016	7/8/2014	9/30/2014	3/23/2016	6/29/2016	9/27/2016	6/21/2017	6/22/2018
Aluminum	NA	U	347	U	U	U	NT	NT	U	1550.0	U	U	U	U	U	U	U	34.0 J	U	U	U	U	U	NT	NT
Antimony	3	U	U	U	21.4 JH *	U	U	UJ	U	U	U	16.0 JH *	U	U	U	U	15.3 JH *	U	U	U	U	16.4 JH *	U	UJ
Arsenic	25	U	U	U	7.3 J	U	U	U	U	U	5.5 J	8.2 J	U	U	U	U	8.0 J	U	U	U	4.6 J	10.5 J *	5.8 J	1.9 J	U
Barium	1,000	29.4 J	132 J	17.6 J	40.0 JH	36.4 JH	24.0	11.6	427	901	659	793 JH	766 JH	444.0	791.0	97 J	413 JH	241 JH	609	1910 *	86 J	1350 JH *	1,330 JH *	163	30.4
Calcium	NA	463,000	401,000	450,000	344,000 JH	417,000 JH	NT	NT	341,000	312,000	249,000	267,000 JH	252,000 JH	411,000	306,000	698,000	302,000 JH	311,000 JH	215,000	170,000	265,000	196,000 JH	241,000 JH	NT	NT
Chromium	50	U	0.72 J	1.40 J	3.90 JH	U	U	1.00 J	0.77 J	3 J	1.10 J	4.20 JH	1.8 J	2.0 J	1.1 J	2.60 J	4.70 JH	8.2 J	U	5.2 J	0.38 J	3.40 JH	U	U	U
Cobalt	NA	U	U	3.1 J	U	U	NT	NT	U	8.6 J	U	1.40 JH	U	U	U	10.30 J	1.60 JH	U	U	U	U	1.9 JH	U	NT	NT
Copper	200	U	U	3.80 J	3.50 JH	U	NT	NT	U	8.6 J	U	1.40 JH	U	U	U	10.30 J	1.60 JH	U	U	U	U	1.9 JH	U	NT	NT
Iron	300	582 *	2650 *	120.0 J	153.0 J	3,690 *	NT	NT	1790 *	3620 *	283.0	51.7 J	42.9	924 *	513 *	18,000 *	166 J	3,780 *	2600 *	4350 *	691 *	1970 *	4,200 *	NT	NT
Lead	25	4.3 J	U	U	7.2 J	U	NT	NT	U	U	U	5.3 J	U	U	U	6.3 J	7.8 J	U	U	U	U	5.2 J	U	NT	NT
Magnesium	35,000	20,800	22,500	19,700	15,000 JH	17,100 JH	26,600	9,220 JH	32,200	31,300	25,700	29,200 JH	28,000 JH	39,700 *	36,200 *	63,400 *	37,600 JH *	41,600 JH *	20,800	16,900	27,600	19,600 JH	23,000 JH	19,800	33,300 JH
Manganese	300	770 *	1,480 *	12.6 J	2,410 JH *	586 *	NT	NT	1,060 *	914 *	692 *	627 JH *	542 *	443 *	426 *	5,810 *	574 JH *	823 *	1,720 *	1,480 *	1,080 *	908 JH *	2,060 *	NT	NT
Mercury	0.7	U	U	U	U	U	NT	NT	U	U	0.040 J	U	U	U	U	U	U	U	U	U	U	U	U	NT	NT
Nickel	100	1.5 J	1.1 J	3.2 J	5.1 J	U	NT	NT	U	4.0 J	3.0 J	3.8 J	U	0.9 J	U	5.9 J	4.1 J	5.7 J	U	7.2 J	3.3 J	3.4 J	U	NT	NT
Potassium	NA	3,780	5,430	3,840	3,440	3,640	NT	NT	9,260 E	8,990	7,910	7,680	6,980	13,100 E	12,000	17,200	12,000	11,400	5,060 J	4,670	6,010	4,380	5,650	NT	NT
Selenium	10	U	U	U	U	U	NT	NT	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	NT	NT
Sodium	20,000	123,000 *	186,000 *	95,400 *	118,000 JH *	72,600 *	NT	NT	152,000 *	196,000 *	160,000 *	180,000 JH *	168,000 *	409,000 *	291,000 *	493,000 *	321,000 JH *	226,000 *	205,000 *	174,000 *	20,400 *	178,000 JH *	175,000 *	NT	NT
Thallium	0.5	15.50 J *	U	7.30 J *	11.60 J *	U	U	U	13.4 J *	U	3.90 J *	6.00 J *	U	9.3 J *	U J	7.60 J *	9.4 J *	U	U	U	4.90 J *	7.1 J *	U	U	U
Vanadium	NA	U	U	U	U	U	U	U	1.2 J *	3.4 J	U	U	U	1.3 J	1.3 J	U	U	U	U	U	U	U	U	U	U
Zinc	2,000	818	91.2	892.0	306	95.7 JH	NT	NT	5.7 J	34.6 J	6.2 J	U	U	5.4 J	U	9.9 J	U	12.9 JH	6.5 J	U	14.3 J	U	U	NT	NT

Contaminant	Groundwater Standard or Guidance Value	MW-J							MW-K					MW-L						
		7/10/2014	9/29/2014	3/22/2016	6/29/2016	9/27/2016	6/21/2017	6/22/2018	7/10/2014	9/30/2014	3/22/2016	6/29/2016	9/27/2016	7/7/2014	9/30/2014	3/23/2016	6/29/2016	9/27/2016	6/21/2017	6/22/2018
Aluminum	NA	977	U	U	34.6 J	U	NT	NT	93.6 J	U	18.3 J	U	35.3 J	196 J	U	U	173.0 J	201	NT	NT
Antimony	3	U	U	U	12.5 JH *	U	U	UJ	U	U	U	12.4 JH *	U	U	U	U	15.8 JH *	U	U	UJ
Arsenic	25	U	U	U	8.9 J	U	U	U	U	U	8.1 J	12.6 J	5.7 J	U	U	U	11.6 J	U	U	U
Barium	1,000	183 J	219	208	224 JH	233 JH	179.0	203	616	928	520	792 JH	1,230 JH *	168 J	202	197 J	213 JH	256 JH	165.0	196
Calcium	NA	127,000	143,000	13,900	146,000 JH	145,000 JH	NT	NT	146,000	136,000	134,000	152,000 JH	150,000 JH	122,000	144,000	149,000	148,000	159,000 JH	NT	NT
Chromium	50	2.1 J	U	0.58 J	3.5 JH	U	U	U	0.70 J	1.1 J	U	3.2 JH	1.5 J	0.85 J	0.71 J	0.93 J	3.7 JH	U	U	U
Cobalt	NA	U	U	U	U	U	NT	NT	U	1.2 J	U	0.84 JH	1.6 J	2.2 J	U	U	0.96 JH	U	NT	NT
Copper	200	6.0 J	U	1.20 J	2.8 JH	U	NT	NT	U	U	2.00 J	2.80 JH	U	U	U	U	3.8 JH	U	NT	NT
Iron	300	1870 *	33.9 J	U	71 J	19.4 J	NT	NT	290	621 *	157 J	179 J	694 *	434 *	351 *	U	383 *	446 *	NT	NT
Lead	25	4.3 J	U	U	U	U	NT	NT	U	U	U	U	U	U	U	U	U	U	NT	NT
Magnesium	35,000	20,800	23,100	22,800	24,300 JH	24,300 JH	18,900	22,200 JH	21,100	20,100	19,000	23,700 JH	23,400 JH	21,300	23,400	23,200	25,600 JH	28,700 JH	21,000	23,700 JH
Manganese	300	131	U	U	30.0 JH	U	NT	NT	1,900 *	1,910 *	1,210 *	3,070 JH *	3,140 *	1,050 *	101	5.9 J	311 *	60.2	NT	NT
Mercury	0.7	U	U	U	U	U	NT	NT	U	U	U	U	0.11 J	U	U	U	U	U	NT	NT
Nickel	100	2.6 J	U	1.5 J	2.8 J	U	NT	NT	2.4 J	3.7 J	2.5 J	5.8 J	U	2.7 J	U	1.4 J	4.0 J	U	NT	NT
Potassium	NA	4,190	3,950	4,100	3,850	3,700	NT	NT	3,600	3,650	3,540	3,330	3,420	5,920 E	4,150	4,170	3,840	4,090	NT	NT
Selenium	10	15.10 J *	U	U	U	U	NT	NT	U	U	U	U	U	U	U	U	U	U	NT	NT
Sodium	20,000	137,000 *	137,000 *	131,000 *	132,000 JH *	145,000 JH *	NT	NT	109,000 *	92,600 *	112,000 *	85,700 JH *	99,500 *	108,000 *	138,000 *	122,000 *	136,000 JH *	178,000 *	NT	NT
Thallium	0.5	U	U	U	4.10 J *	U	U	U	U	U	U	8.20 J *	U	U	U	U	3.8 J *	U	U	U
Vanadium	NA	1.3 J	U	U	U	U	U	U	U	1.3 J	U	U	U	1.3 J	U	U	U	U	U	U
Zinc	2,000	20.1 J	6.2 J	9.1 J	U	U	NT	NT	7.3 J	6.2 J	10.6 J	U	U	8.4 J	U	8.7 J	4.4 J	U	NT	NT

Contaminant	Groundwater Standard or Guidance Value	MW-M							MW-N					Production Well
		7/9/2014	9/30/2014	3/22/2016	6/29/2016	9/27/2016	6/21/2017	6/21/2018	7/7/2014	9/29/2014	3/23/2016	6/29/2016	9/27/2016	9/30/2014
Aluminum	NA	115 J	1310	U	U	U	NT	NT	434	326	U	U	U	U
Antimony	3	U	U	8.5 J *	18.1 JH *	U	U	UJ	U	U	U	13.5 JH *	U	U
Arsenic	25	U	7.0 J	U	8.7 J	U	U	U	U	U	U	8.7 J	U	4.8 J
Barium	1,000	1010 *	812	242	156 JH	55.5 JH	432.0	24.8	241	179 J	190 J	200 JH	258 JH	289
Calcium	NA	272,000	325,000	251,000	368,000	538,000 JH	NT	NT	161,000	128,000	138,000	136,000	165,000 JH	129,000
Chromium	50	0.77 J	1.9 J	0.95 J	3.80 JH	117 *	U	U	309.00 *	148.00 *	73.0 *	10.7 JH	10.2	0.84 J
Cobalt	NA	U	U	U	U	0.9 J	NT	NT	U	U	U	U	U	U
Copper	200	U	5.2 J	U	1.9 JH	17.8	NT	NT	4.3 J	U	U	1.4 JH	U	U
Iron	300	5520 *	5150 *	1250 *	443 *	2,980 *	NT	NT	2100 *	843 *	87.5 J	U	40.4	1030 *
Lead	25	U	U	U	7.8 J	U	NT	NT	U	U	U	U	U	U
Magnesium	35,000	22,600	26,300	22,200	27,600 JH	39,000 JH *	21,800 J	19,000 JH	25,700	19,900	20,700	21,400 JH	25,600 JH	22,500
Manganese	300	1,370 *	1,210 *	1,700 *	1,650 *	4,010 *	NT	NT	453 *	382 *	205	190	181	91
Mercury	0.7	U	U	U	U	U	NT	NT	U	U	U	U	U	U
Nickel	100	U	1.9 J	2.8 J	3.9 J	59.7	NT	NT	2.2 J	1.6 J	2.0 J	2.3 J	U	1.3 J
Potassium	NA	12,800 E	15,700	12,700	19,700	17,400	NT	NT	5,520 E	6,120	5,180	4,310	4,444	3,900
Selenium	10	U	U	U	U	U	NT	NT	U	U	U	U	U	U
Sodium	20,000	439,000 *	694,000 *	349,000 *	972,000 JH *	622,000 JH *	NT	NT	162,000 *	126,000 *	149,000 *	131,000 JH *	156,000 *	129,000 *
Thallium	0.5	U	U	3.40 J *	12.70 J *	U	U	U	U	U	3.60 J *	2.90 J *	U	U
Vanadium	NA	U	2.0 J	U	U	1.9 J	U	U	1.7 J	1.4 J	U	U	U	U
Zinc	2,000	5.1 J	10.9 J	26.7 J	U	U	NT	NT	14.2 J	7.3 J	8.9 J	U	U	369

Notes

Test results and groundwater standards or guidance values reported in µg/L = micrograms per Liter or parts per billion (ppb).

Groundwater Standards or Guidance Values as referenced in New York State Department of Environmental Conservation (NYSDEC) Technical and Guidance Series (TOGS) 1.1.1 dated June 1998 as amended by the NYSDEC's supplemental table dated April 2000.

NA = Not Available

U = The analyte was analyzed for, but was not detected above the associated reported quantitation limit. Refer to the analytical laboratory report for the associated reported quantitation limit

E = an estimated concentration due to the presence of interferences

J = indicates a concentration below the reporting limit and equal to or above the detection limit, and is considered an estimated concentation

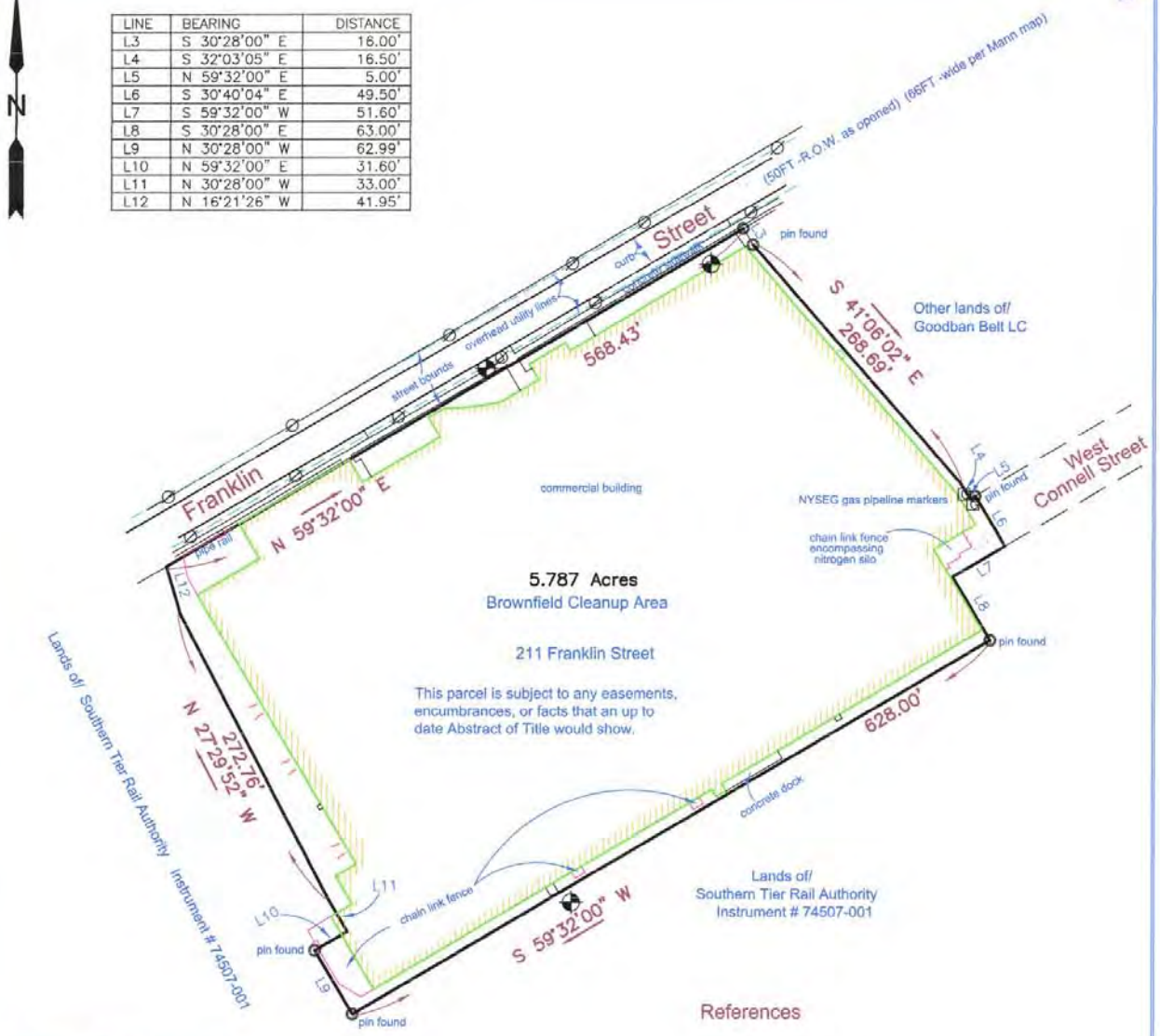
JH = Data Validation indicated the concentration estimated by the analytical laboratory is biased high

* = Exceeds Groundwater Standard or Guidance Value

ATTACHMENT A

PROPERTY SURVEY MAP

LINE	BEARING	DISTANCE
L3	S 30°28'00" E	16.00'
L4	S 32°03'05" E	16.50'
L5	N 59°32'00" E	5.00'
L6	S 30°40'04" E	49.50'
L7	S 59°32'00" W	51.60'
L8	S 30°28'00" E	63.00'
L9	N 30°28'00" W	62.99'
L10	N 59°32'00" E	31.60'
L11	N 30°28'00" W	33.00'
L12	N 16°21'26" W	41.95'



Environmental Easement description
211 Franklin Street

Beginning at the intersection of the south bounds of Franklin Street with the east bounds of lands of Southern Tier Rail Authority LLC, thence N 59-32-00 E along the south street bounds of Franklin Street, a distance of 568.43' to a point, thence through the lands of Goodban Belt, LLC:
1) S 41-06-02 E, a distance of 268.69' to a point
2) S 30-28-00 E, a distance of 16.00' to a point
3) S 32-03-05 E, a distance of 16.50' to a point on the north bounds of West Connell Street, thence N 59-32-00 E along the north bounds of West Connell Street, a distance of 5.00' to a point, thence S 30-40-04 E crossing West Connell Street, a distance of 49.50' to a point, thence S 59-32-00 W along the south bounds of West Connell Street, a distance of 51.60' to a point, thence along the bounds of lands now or formerly of Southern Tier Rail Authority:
1) S 30-28-00 E, a distance of 63.00' to a point
2) S 59-32-00 W, a distance of 628.00' to a point
3) N 30-28-00 W, a distance of 63.00' to a point
4) N 59-32-00 E, a distance of 31.60' to a point
5) N 30-28-00 W, a distance of 33.00' to a point
6) N 27-29-52 W, a distance of 272.76' to a point
7) N 16-21-26 W, a distance of 41.95' to the point of beginning

Contains 5.787 acres+/-

300 200 100 0
1IN=100FT

91.44 60.96 30.48 0
1IN=30.48METERS

References

1) Title Search/
Dated: December 20, 2010
File #5005973
Policy #7430732-8296035
Frontier Abstract & Research Services, Inc.

2) Deed/
Henkel Corporation to Goodban Belt LLC
Instrument # 145975-001
Dated: August 31, 2010
Recorded: September 1, 2010

3) Survey/
for Dexter Corporation
Dated: August 2, 1979
by M.C. Ackerman, LS 23028

Typical Symbols
-hydrant
-utility pole
-light pole
-monitor well
d. -deed distance
m. measured distance

This survey is certified to the following/

1) New York State Department of Environmental Conservation

Map and Survey for:
Goodban Belt LLC
of lands at
211 Franklin Street

Copies Invalid Unless Embossed

Part of Lots 4 & 6, Section 5 , Twp # 2, Range # 4 of the Holland Land Co.'s Survey
Blocks 64 and 74 and part of Blocks 63, 65, 73, 75, 80, 81, and 82
Part of Franklin, Washington, Vine, and Spruce streets, and other lands
according to the "Mann Map of Olean Depot"
City of Olean
Cattaraugus County, New York
Date: November 25, 2013
Scale: 1IN = 100FT

Prepared By:
D. Michael Canada
New York State
Licensed Land Surveyor
483 North Union Street
Olean, NY 14760
N.Y.S. Lic. No.49215
716-379-7918

Job Number: 7526

D. Michael Canada

ATTACHMENT B

SITE WIDE INSPECTION FORM, PHOTOGRAPHS AND DOCUMENTATION OF REPAIRS

Site-Wide Inspection Form

211 Franklin Street

City of Olean, New York

NYSDEC Site Number: C905038

Date of Inspection Site Visit: June 19, 2019

Personnel Performing Inspection Site Visit: Charles Hampton / Mark Wendel

Affiliation of Personnel: Day Environmental, Inc. / Sol-Epoxy

1. **Check integrity of impermeable portions (e.g., concrete) of cover system, include whether any sloughing, cracks, settlement, damage, etc.**

Discuss observations and any corrective actions:

Concrete pavement @ west (~~Receiving~~ Shipping Lot); east (receiving lot); south (loading dock) exterior portions of building, and interior concrete floor slabs observed to be in good condition

2. **Check integrity of permeable portions (e.g., soil) of cover system, include whether any sloughing, cracks, settlement, damage, etc.**

Discuss observations and any corrective actions:

Soil cover around the north, east and south/southwest perimeter of building appears in place and the vegetation appears healthy

3. **Check integrity of vegetative cover (e.g., grass), include whether any dead areas, erosion, etc.**

Discuss observations and any corrective actions:

Vegetation appears healthy and is holding the soil cover in place

4. **Check integrity of building floor slabs (e.g., ground floor and basement), include whether any sloughing, cracks, settlement, damage, etc.**

Discuss observations and any corrective actions:

integrity of building floor slabs appears to be intact and in good condition

(Note: the area of minor degredation/cracking along the surface of the concrete patch assocated with the SSDS trench, noted during the June 2018 inspection, was repaired prior to the inspection on June 19, 2019. Refer to the attached photograph.)

5. **SSDS Monitoring**

   a. **Fan #1 - Have pressure measurements been collected monthly, since last inspection?** (Y) N

   b. **Fan #2 - Have pressure measurements been collected monthly, since last inspection?** (Y) N

   c. **Have the Annual Inspections for Fan #1 and Fan #2 been completed?**

(Y) _____ **(date completed)**

(N) ~~June. 2019~~ **(anticipated inspection date)**

Discuss observations and any corrective actions:

(See attached Annual Fan Inspection Form - Inspections completed June 7, 2019)

(Note: no need for corrective actions were identified on June 17, 2019)

6. **Groundwater Monitoring Well Assessment**

Discuss observations and any corrective actions:

Monitoring wells were not opened, However monitoring well covers/casing appear to be in good condition

View (facing south) of the repaired/resurfaced concrete patch over SSDS, located in the Packaging Department of the facility building, were minor cracking/settlement was noted during the previous reporting period.

View of the soil cover adjacent to the northwest of the facility building and concrete cover on the northern portion of the Shipping Lot, facing west.

View of the soil cover adjacent to the northeast of the facility building, facing east.

View of the concrete cover on the northern portion of the Shipping Lot, facing southeast.

View of the concrete cover on the southern portion of the Shipping Lot, facing north.

View of the soil cover in the Maintenance Department break area, facing north.

View of the soil cover (foreground) and the asphalt cover (background) located at the southwest corner of the Site, adjacent to the Maintenance Department break area fence, facing south. [note: a stake, delineating the western property boundary, is visible in the foreground.]

View of the soil cover located along the southern edge of the facility building, facing east.

View of the soil cover and asphalt cover located along the southern edge of the facility building, facing east. [note: the southern edge of the asphalt cover extends to the southern property boundary.]

View (facing north) of the area at the southeast property corner where minor erosion was noted in prior reporting periods. It is assumed that the sparse vegetation is due to vehicle traffic.

View of the asphalt cover and concrete cover over the Receiving Lot, located at the southeast portion of the Site, facing northeast (note: the eastern edge of the asphalt and concrete cover extends to the eastern property boundary.)

View of the asphalt cover adjacent to the northeast of the Receiving Lot, and soil cover along the eastern edge of the facility, facing north (note: the eastern edge of the asphalt extends to the eastern property boundary.)

View of the soil cover located along the eastern edge of the facility building, facing south.

View of the asphalt cover located along the northern edge of the facility building in the Visitor Parking area, facing west.

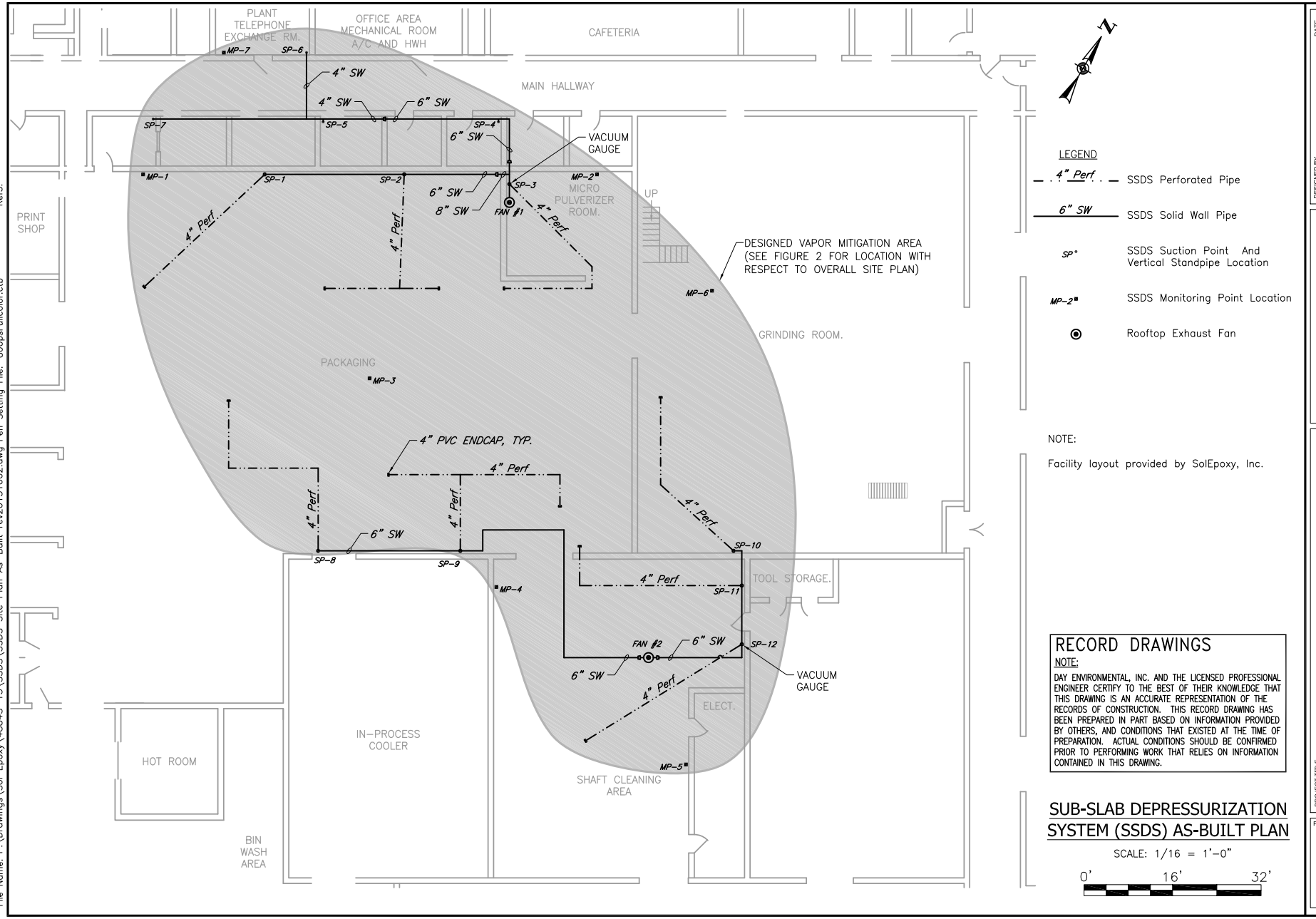
View of the soil cover located along the northern edge of the facility building, located to the east of the Main Entrance, facing west.

View of the rip-rap cover (foreground, left) and soil cover located along the northern edge of the facility building, located to the west of the Main Entrance, facing southwest.

View of the soil cover located along the northern edge of the facility building, located to the east of the Employee Entrance, facing southwest.

ATTACHMENT C

SSDS PERIODIC MONITORING AND ANNUAL INSPECTION RESULTS



N

LEGEND

- 4" Perf — SSDS Perforated Pipe
- 6" SW — SSDS Solid Wall Pipe
- SP* — SSDS Suction Point And Vertical Standpipe Location
- MP-2 — SSDS Monitoring Point Location
- Rooftop Exhaust Fan

NOTE:

Facility layout provided by SolEpoxy, Inc.

RECORD DRAWINGS

NOTE:

DAY ENVIRONMENTAL, INC. AND THE LICENSED PROFESSIONAL ENGINEER CERTIFY TO THE BEST OF THEIR KNOWLEDGE THAT THIS DRAWING IS AN ACCURATE REPRESENTATION OF THE RECORDS OF CONSTRUCTION. THIS RECORD DRAWING HAS BEEN PREPARED IN PART BASED ON INFORMATION PROVIDED BY OTHERS, AND CONDITIONS THAT EXISTED AT THE TIME OF PREPARATION. ACTUAL CONDITIONS SHOULD BE CONFIRMED PRIOR TO PERFORMING WORK THAT RELIES ON INFORMATION CONTAINED IN THIS DRAWING.

SUB-SLAB DEPRESSURIZATION SYSTEM (SSDS) AS-BUILT PLAN

SCALE: 1/16 = 1'-0"

0' 16' 32'

DESIGNED BY: BFK
DATE: 7-2015
DRAWN BY: RJM
DATE DRAWN: 8-14-2015
SCALE: As Noted
DATE ISSUED: 8-14-2015

DAY ENVIRONMENTAL, INC.
ENVIRONMENTAL CONSULTANTS
ROCHESTER, NEW YORK 14606
NEW YORK, NEW YORK 10170

PROJECT TITLE
211 FRANKLIN STREET
OLEAN, NEW YORK

BCP SITE NO. C905038 OPERATION & MAINTENANCE PLAN

DRAWING TITLE
Site Plan Depicting As-Built Sub-Slab Depressurization System (SSDS) Components

PROJECT NO.
4884S-13

J-1

Ref1:
Ref2:
Ref3:
Xerox432AnsiB-2: 11 x 17
Layout Name: Layout2
Pen Setting File: 800psFullcolor.ctb
Time Plotted: Friday, October 02, 2015 2:07:58 PM
File Name: P:\Drawings\Sol Epoxy\4884S-13\SSDS\SSDS Site Plan As-Built rev20151002.dwg

SSDS INSPECTION LOG FORM

QUARTERLY INSPECTION	Fan #1				Fan #2			
Date	6/7				6/7			
Inspector	BP				BP			
Static Pressure (in. H_2O vacuum)	2.5				1.8			
Static Pressure Required* (in. H_2O vacuum)	≥ 1.7 in.	≥ 1.7 in.	≥ 1.7 in.	≥ 1.7 in.	≥ 1.2 in.	≥ 1.2 in.	≥ 1.2 in.	≥ 1.2 in.

ANNUAL INSPECTION	Fan #1	Fan #2
Date	6/7/19	6/7/19
Inspector	B. PARSONS	B. PARSONS
Fan Operation Confirmed	X	X
Exhaust Point Free of Obstruction	X	X
Fan Checked for : Vibration/Noise	X	X
Damage	X	X
Secure Mounting	X	X
Secure Power Connection	X	X
Piping Checked for: Damage	X	X
Secure Mounting	X	X
Transition Seals Secure	X	X

*Static pressures reading(s) below these values require systems repair, maintenance and/or engineering evaluation to confirm continued effectiveness.

SSDS Monthly Inspection (Fan #1)						
		Inspector		Date		Reading
Jan-19		BP		1/4/19		2.4
Feb-19		DL		2/6/19		2.4
Mar-19		MC		3/11/19		2.4
Apr-19		BP		4/8/19		2.4
May-19		BP		5/2/19		2.5
Jun-19		BP		6/6/19		2.5
Jul-19		BP		7/9/19		2.5
Aug-19		BP		8/5/19		2.4
Sep-19		BP		9/10/19		2.5
Oct-19		BP		10/3/19		2.5
Nov-19		BP		11/5/19		2.4
Dec-19		BP		12/6/19		2.4
JAN20		BP		1/9/20		2.4
Feb 20		Doug Louk		02/10/20		2.4

*Reading should be greater than or equal to 1.7 in.

*Static pressure readings below these values require system repair, maintenance and/or engineering evaluation to confirm continued effectiveness

SSDS Monthly Inspection (Fan #2)						
		Inspector		Date		Reading
Jan-19		BP		1/3/19		1.6
Feb-19		DL		2/6/19		1.7
Mar-19		MC		3/11/19		1.7
Apr-19		BP		4/5/19		1.7
May-19		BP		5/2/19		1.8
Jun-19		BP		6/6/19		1.8
Jul-19		BP		7/9/19		1.9
Aug-19		BP		8/5/19		1.9
Sep-19		BP		9/10/19		1.9
Oct-19		BP		10/3/19		1.9
Nov-19		BP		11/5/19		1.8
Dec-19		BP		12/6/19		1.7
JAN 20		BP		1/9/20		1.7
Feb 20		Doug Louk		02/10/20		1.7

*Reading should be greater than or equal to 1.2 in.

*Static pressure readings below these values require system repair, maintenance and/or engineering evaluation to confirm continued effectiveness

ATTACHMENT D

INSTITUTIONAL AND ENGINEERING CONTROL CERTIFICATION FORMS

Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form

Site Details **Box 1**

Site No. **C905038**

Site Name 211 Franklin Street

Site Address: 211 Franklin Street Zip Code: 14760
City/Town: Olean
County: Cattaraugus
Site Acreage: 5.787

Reporting Period: ~~February 10, 2019~~ to February 10, 2020

February 11, 2019

	YES	NO
1. Is the information above correct?	☐	■
If NO, include handwritten above or on a separate sheet.		
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?	☐	■
3. 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?	☐	■
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.		
5. Is the site currently undergoing development?	☐	■

Box 2

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial	■	☐
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 and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

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

Box 2A

	YES	NO
8. Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?	☐	■

If you answered YES to question 8, include documentation or evidence that documentation has been previously submitted with this certification form.

	YES	NO
9. Are the assumptions in the Qualitative Exposure Assessment still valid? (The Qualitative Exposure Assessment must be certified every five years)	■	☐

If you answered NO to question 9, the Periodic Review Report must include an updated Qualitative Exposure Assessment based on the new assumptions.

SITE NO. C905038 **Box 3**

Description of Institutional Controls

Parcel	Owner	Institutional Control
94.040-1-21	Silence Dogwood LLC	Ground Water Use Restriction Soil Management Plan Landuse Restriction Monitoring Plan Site Management Plan O&M Plan IC/EC Plan

Box 4

Description of Engineering Controls

Parcel	Engineering Control
94.040-1-21	Vapor Mitigation Cover System

Box 5

Periodic Review Report (PRR) Certification Statements

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

   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
■	☐

2. 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.

YES	NO
■	☐

IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

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. C905038

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1,2, and 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.

I Jeffrey Belt (print name) at 211 Franklin Street, Olean, New York, 14760 (print business address),

am certifying as Representative of the Owner (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

Signature of Owner, Remedial Party, or Designated Representative Rendering Certification

March 5, 2020
Date

IC/EC CERTIFICATIONS

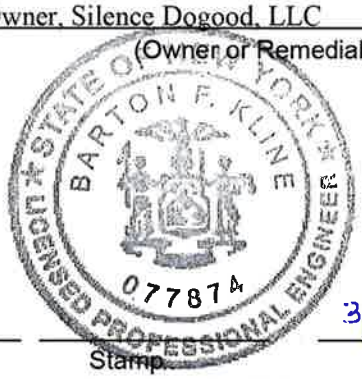
Box 7

Professional Engineer Signature

I certify that all information in Boxes 4 and 5 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 Barton F. Kline (print name) at Day Environmental, Inc. 1563 Lyell Avenue, Rochester, NY 14606 (print business address),

am certifying as a Professional Engineer for the Owner, Silence Dogood, LLC (Owner or Remedial Party)



B. F. Kline — Signature of Professional Engineer, for the Owner or Remedial Party, Rendering Certification

Stamp (Required for PE)

3/6/20 — Date

NYSDEC
AIR PERMIT # 9-9 -0412-00014/02001

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Region 9 Main Office
270 Michigan Avenue, Buffalo, NY 14203-2915
P: (716) 851-7000 | F: (716) 851-7211
www.dec.ny.gov

July 16, 2015

Mr. Robert Groele
Soelpoxy Inc.
211 Franklin Street
Olean, New York 14760

Dear Permittee:

PERMIT TRANSMITTAL LETTER
DEC PERMIT # 9-9-0412-00014/02001

Enclosed is your permit which was issued in accordance with applicable provisions of the Environmental Conservation Law. The permit is valid for only that project, activity or operation expressly authorized.

The DEC permit number and Program ID number, if applicable, should be retained for your records and should be referenced on all future correspondence and applications related to the permit. If modifications are desired after permit issuance, you must submit the proposed revisions and receive written approval from the Permit Administrator prior to initiating any change. If the Department determines that the modification represents a material change in the scope of the authorized project, activity, operation or permit conditions, you will be required to submit a new application for permit.

Please note the expiration date of the permit. Applications for permit renewal should be made well in advance of the expiration date (minimum of 30 days) and submitted to the Regional Permit Administrator at the above address. For SPDES, Solid Waste and Hazardous Waste Permits, renewals must be made at least 180 days prior to the expiration date.

Please review all permit conditions carefully. In particular, identify your initial responsibilities under this permit in order to assure timely action if required. Since failure to comply precisely with permit conditions may be treated as a violation of the environmental conservation law, you are requested to provide a copy of the permit to the project contractor, facility operator, and other persons directly responsible for permit implementation (if any).

If you have any questions, please contact this office at the above address.

Respectfully,
David S. Denk
Regional Permit Administrator

DSD:lj

Enclosure

ecc: Captain Frank Lauricella, Division of Law Enforcement, NYSDEC Region 9
Alfred Carlacci, RAPCE, NYSDEC Region 9 Buffalo, Attn: Geoffrey Knall

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-0412-00014/02001
Effective Date: 07/16/2015 Expiration Date: 07/15/2025

Permit Issued To:SOLEPOXY INC
211 FRANKLIN ST
OLEAN, NY 14760

Contact: ROBERT GROELE
SOLEPOXY INC
211 FRANKLIN ST
OLEAN, NY 14760

Facility: SOLEPOXY INC
211 FRANKLIN ST
OLEAN, NY 14760-1297

Description:
SolEpoxy manufactures epoxy molding compounds and epoxy coating powders for the protection and insulation of electrical, electronic and microelectronic components in the City of Olean, Cattaraugus County. SolEpoxy was formerly known as Henkel Adhesive Corporation until September 2010. SolEpoxy's manufacturing processes includes batch mixing, blending, extruding, grinding, and packaging.

This renewal is being issued to remove most of the liquid encapsulants production line and associated air contaminates from the permit. This renewal will also remove the facility wide emission caps for Volatile Organic Compounds (VOC), Total Hazardous Air Pollutants (HAP), and individual HAPs such as; Methyl Alcohol, Methyl Ethyl Ketone (MEK), 2-Pentanone 4-Methyl, Formaldehyde, Toluene, and Trichloroethylene (TCE). Due to a decline in production along with the removal of most of liquid encapsulation production line, SolEpoxy's emissions are low enough that they do not need to cap out of Title V applicability. SolEpoxy is still required to calculate and keep track of all emissions emitted from the facility. All of the processes are in one emission unit, U-00001.

The caps for SolEpoxy were introduced into permit when the facility was still owned by Henkel. At the time the Potential to Emit (PTE) was derived from conservative calculations with the facility only making products with the highest emissions. This yielded a PTE of 90 tons for HAPs and 92 tons for VOCs. SolEpoxy's current PTE has dwindled to 0.13 tons for HAPs and 8.98 tons for VOCs. Because the facility has 51 emission points it is more economical to keep its Air State Facility permit than to apply for an Air Registration.

The liquid encapsulants were manufactured under processes R02, R05, and R07. These processes have been discontinued and removed from the permit. The HAPs derived from these

processes; Formaldehyde, Toluene, and Trichloroethylene (TCE), are no longer emitted from the facility. The production of the liquid encapsulants have been relocated to another facility. Only a few pieces of equipment remain in the building and in the permit. Should the liquid encapsulant line become active again, SolEpoxy does not intend to operate the production line in a manner that will produce the former HAPs associated with the encapsulatant production, i.e. Formaldehyde, Toluene and TCE.

SolEpoxy also uses a Heptane Silicone release spray to ensure epoxies do not stick to their plastic mold trays, which are used to produce Light Emitting Diode (LED) product. This would be classified as a Class "B" spray coating operation in 6NYCRR Subpart 228-1. However, SolEpoxy's actual VOC emissions are about 1 ton per year which is below the 3 ton per year applicability level that requires the use of complaint coatings. The facility must still comply with 228-1.3 General Requirements for records and housekeeping. The usage of the release spray is tracked.

The permit includes opacity and particulate emissions limits at the facility level. SolEpoxy shall not allow emissions with an average opacity during any six consecutive minutes to exceed 20 percent or greater from any stack or emission point, except only the emission of uncombined water. Similarly particulate emissions shall not exceed 0.050 grains per dry standard cubic foot from any emission point at the facility.

SolEpoxy also has two industrial size boilers, one rated at 200 horsepower and the other at 80 horsepower. Both boilers only fire natural gas, therefore they are not subject to 40 CFR63 Subpart JJJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. These boilers are rated less than 10 million Btu/hr and are exempt from permitting under 6NYCRR Part 201-3.2(c)(1)(i).

SolEpoxy has two natural gas emergency generators located at the facility and each one is rated at 34.6 horsepower, and are used only to provide backup lighting for the facility. These emergency generators are exempt from permitting under Subpart 201-3: Permit Exempt and Trivial Activities [6NYCRR Part 201-3.2(c)(6)]. 201-3.2 states that emergency power generating stationary internal combustion engines defined in 201.1(cq) are exempt sources. 200.1(cq) defines an emergency generator a stationary internal combustion engine that operates as an electrical power source only when the usual supply of power is unavailable, and operates for no more than 500 hours per year.

However, SolEpoxy must still comply with the requirements of 40CFR63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines which is administered by EPA. The generators are existing emergency generators at an area source of hazardous air pollutants. They were manufactured in 1995. In order for the emergency engine to be in compliance with Subpart ZZZZ, the facility must follow the requirements in §63.6603(a) Table 2d, item 5, which are listed below.

(1) Change oil and filter every 500 hours of operation or annually, whichever comes first; The facility has the option to utilize an oil analysis program as specified in 40 CFR 63.6625 to extend the specified oil change requirement.

(2) Inspect the air filter every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.

(3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

In addition, the engine shall be equipped with a non-resettable hour meter if one is not already installed. The engine shall be operated and maintained per the manufacturer's instructions or your own maintenance plan, per 40 CFR 63.6625(e)(3). SolEpoxy must keep records of operation, maintenance and each malfunction for both of the emergency standby generators to demonstrate compliance with 40 CFR 63 subpart ZZZZ.

SolEpoxy also has one room onsite devoted to Research and Development (R&D). This room contained about 12 mini electric ovens and a small epoxy mixing line. Because this is a small scale R&D project, it is also considered exempt from permitting under Subpart 201-3: Permit Exempt and Trivial Activities [6NYCRR Part 201-3.2(c)(40)].

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: DAVID S DENK
DIVISION OF ENVIRONMENTAL PERMITS
270 MICHIGAN AVE
BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: 7/16/2015

Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

PAGE LOCATION OF CONDITIONS

DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:
The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:
The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:
A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:
Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:
The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:
Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:
The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

a) materially false or inaccurate statements in the permit application or supporting papers;
b) failure by the permittee to comply with any terms or conditions of the permit;
c) exceeding the scope of the project as described in the permit application;
d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:
Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:SOLEPOXY INC
211 FRANKLIN ST
OLEAN, NY 14760

Facility: SOLEPOXY INC
211 FRANKLIN ST
OLEAN, NY 14760-1297

Authorized Activity By Standard Industrial Classification Code:
3087 - CUSTOM COMPOUND PURCHASED RESINS
3089 - PLASTICS PRODUCTS, NEC

Permit Effective Date: 07/16/2015 Permit Expiration Date: 07/15/2025

PAGE LOCATION OF CONDITIONS

PAGE

FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: **Sealing - 6 NYCRR 200.5**

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: **Acceptable Ambient Air Quality - 6 NYCRR 200.6**

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: **Maintenance of Equipment - 6 NYCRR 200.7**

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Item D: **Unpermitted Emission Sources - 6 NYCRR 201-1.2**

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or

modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: **Emergency Defense - 6 NYCRR 201-1.5**

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item F: **Recycling and Salvage - 6 NYCRR 201-1.7**

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item G: **Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8**
No person shall unnecessarily remove, handle, or cause to be handled,

collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item H: **Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)**
The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item I: **Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)**
The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item J: **Required Emission Tests - 6 NYCRR 202-1.1**

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item K: **Open Fires Prohibitions - 6 NYCRR 215.2**
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item L: **Permit Exclusion - ECL 19-0305**
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes

of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: **Federally Enforceable Requirements - 40 CFR 70.6 (b)**
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: **Exempt Sources - Proof of Eligibility**
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable Federal Requirement:6 NYCRR 201-3.2 (a)

Item 1.1:
The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 2: **Compliance Demonstration**
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable Federal Requirement:6 NYCRR 201-3.2 (a)

Item 2.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 2.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:

AS PROOF OF EXEMPT ELIGIBILITY FOR THE EMERGENCY GENERATORS, THE FACILITY MUST MAINTAIN MONTHLY RECORDS WHICH DEMONSTRATE THAT EACH ENGINE IS OPERATED LESS THAN 500 HOURS PER YEAR, ON A 12-MONTH ROLLING TOTAL BASIS.

Work Practice Type: HOURS PER YEAR OPERATION
Upper Permit Limit: 500.0 hours
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 3: **Air pollution prohibited**
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 3.1:
No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 4: **Compliance and Enforcement**
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 4.1:
The Department has not accepted delegation of 40 CFR Part 63 Subpart ZZZZ. Any questions concerning compliance and/or enforcement of this regulation should be referred to USEPA Region 2, 290 Broadway, 21st Floor, New York, NY 10007-1866; (212) 637-4080. Should the Department decide to accept delegation of 40 CFR Part 63 Subpart ZZZZ during the term of this permit, enforcement of this regulation will revert to the Department as of the effective date of delegation.

Condition 5: **Compliance Demonstration**
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable Federal Requirement:40CFR 63.6603(a), Subpart ZZZZ

Item 5.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 5.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator of an existing emergency and black start spark ignition stationary RICE located at an area source of HAP emissions must comply with the following maintenance procedures:

(1) Change oil and filter every 500 hours of operation or annually, whichever comes first;
(2) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
(3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Initial compliance will be demonstrated according to the provisions in 40 CFR 63.6630.

Continuous compliance will then be demonstrated according to 40 CFR 63.6640. The facility must keep records according to the provisions in 40 CFR 63.6655 and submit the notifications and reports listed in 40 CFR 63.6645 and 63.6650.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 6: **Compliance Demonstration**
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable Federal Requirement:40CFR 63.6625(f), Subpart ZZZZ

Item 6.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 6.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Owners or operators of an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, must install a non-resettable hour meter if one is not already installed, and record hours of operation, including run time during emergencies.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

****** Emission Unit Level ******

Condition 7: **Compliance Demonstration**
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 7.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 7.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
For each stack, emissions of solid particulate are limited to less than 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry basis. Compliance testing by the facility will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: **Compliance Demonstration**
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 8.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 8.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
No persons shall cause or allow emissions having an average opacity

during any six consecutive minutes of 20 percent or greater from any process emission source, except emissions of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation. The facility will also allow the Department to perform the Method 9 evaluation anywhere on plant property.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 9: **Compliance Demonstration**
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable Federal Requirement:6 NYCRR 228-1.3 (a)

Item 9.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001 Emission Point: E0017
Process: R08

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 9.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance will be determined by conducting observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow). Observations must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

This logbook must be retained at the facility for five (5) years after

the date of the last entry. If the operator observes any visible emissions the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions persist after corrections are made, the permittee will immediately notify the department and may be required to conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: 40 CFR 60 Appendix A Method 9
Monitoring Frequency: SEMI-ANNUALLY
Averaging Method: 6 MINUTE AVERAGE
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 10: Compliance Demonstration
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable Federal Requirement:6 NYCRR 228-1.3 (b) (1)

Item 10.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001 Emission Point: E0017
Process: R08

Item 10.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.

2. Purchase, usage and/or production records of each coating material, including solvents.

3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.

4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.

5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 11: Compliance Demonstration
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable Federal Requirement:6 NYCRR 228-1.3 (b) (2)

Item 11.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001 Emission Point: E0017
Process: R08

Item 11.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Owners and operators of emission sources not subject to 6 NYCRR Part 228-1, as set forth in Paragraphs 228-1.1(b)(9) or (13), or those sources that are using coatings not subject to specific requirements of Part 228-1 as set forth in Paragraph 228-1.3(e)(2), or Clauses 228-1.4(b)(5)(iii)(e), 228-1.4(b)(5)(iii)(i) or 228-1.4(b)(5)(iv), must maintain records on an as used basis. The records must include the relevant regulatory citation of each exemption and quantity of coating used. If the exemption criteria are based on VOC usage, the records must contain calculations and supplier/manufacturer material data sheets for verification of VOC usage. All records required by this Paragraph must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Surface Coating- Prohibitions
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable Federal Requirement:6 NYCRR 228-1.3 (c)

Item 12.1:
This Condition applies to Emission Unit: U-00001 Emission Point: E0017
Process: R08

Item 12.2:
(1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

(i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

(2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

Condition 13: Surface Coating - Handling, storage and disposal
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable Federal Requirement:6 NYCRR 228-1.3 (d)

Item 13.1:
This Condition applies to Emission Unit: U-00001 Emission Point: E0017
Process: R08

Item 13.2:
Within the work area(s) associated with a coating line, the owner or operator of a facility must:

(1) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

(2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;

(3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(4) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;

(6) minimize spills during the handling and transfer of coatings and VOC solvents; and

(7) clean hand held spray guns by one of the following:

(i) an enclosed spray gun cleaning system that is kept closed when not in use;

(ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;

(iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or

(iv) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: **Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)**
Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item B: **General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**
Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state only enforceable.

Condition 14: Contaminant List
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable State Requirement:ECL 19-0301

Item 14.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this

STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: **Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)**
Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item B: **General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**
Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state only enforceable.

Condition 14: **Contaminant List**
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable State Requirement:ECL 19-0301

Item 14.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this

permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY075-00-0
Name: PARTICULATES

Condition 15: Malfunctions and start-up/shutdown activities
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable State Requirement:6 NYCRR 201-1.4

Item 15.1:
(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 16: Emission Unit Definition
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 16.1:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: U-00001
Emission Unit Description:
This emission unit uses batch mixing operations to produce electronic formulated liquids. This emission unit also uses blending, extruding, grinding and packaging operations to produce molding powders and coating powders. This unit contains all eleven processes at the facility; identified as R01, R03, R04, R06, R08, R09, R10, R11, R12, R13 and R14, and all 51 emission points.

Building(s): 01

Condition 17: Renewal deadlines for state facility permits
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 17.1:
The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 18: Compliance Demonstration
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 18.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 18.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 9
270 Michigan Ave.
Buffalo, NY 14203

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 19: Visible Emissions Limited

Effective between the dates of 07/16/2015 and 07/15/2025

Applicable State Requirement:6 NYCRR 211.2

Item 19.1:
Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

****** Emission Unit Level ******

Condition 20: Emission Point Definition By Emission Unit
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 20.1:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00001

Emission Point: E0001
Height (ft.): 24 Diameter (in.): 12
NYTMN (km.): 4666. NYTME (km.): 215.4 Building: 01

Emission Point: E0002
Height (ft.): 24 Diameter (in.): 24
NYTMN (km.): 4666. NYTME (km.): 215.4 Building: 01

Emission Point: E0003
Height (ft.): 17 Diameter (in.): 2
NYTMN (km.): 4666. NYTME (km.): 215.4 Building: 01

Emission Point: E0004
Height (ft.): 17 Diameter (in.): 2
NYTMN (km.): 4666. NYTME (km.): 215.4 Building: 01

Emission Point: E0012
Height (ft.): 37 Diameter (in.): 18
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0013
Height (ft.): 29 Diameter (in.): 18
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0014
Height (ft.): 26 Diameter (in.): 10
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0015
Height (ft.): 36 Diameter (in.): 28
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0016
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0017
Height (ft.): 35 Diameter (in.): 24
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0018
Height (ft.): 23 Diameter (in.): 12
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0019
Height (ft.): 23 Diameter (in.): 12
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0020
Height (ft.): 27 Length (in.): 12 Width (in.): 12
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0021
Height (ft.): 28 Diameter (in.): 16
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0022
Height (ft.): 20 Diameter (in.): 2
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0023
Height (ft.): 14 Diameter (in.): 2
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0027
Height (ft.): 30 Diameter (in.): 2
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0028
Height (ft.): 31 Diameter (in.): 2
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0030
Height (ft.): 29 Diameter (in.): 1
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0031
Height (ft.): 29 Diameter (in.): 3
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0034
Height (ft.): 23 Diameter (in.): 2
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0038
Height (ft.): 17 Diameter (in.): 18
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0039
Height (ft.): 18 Diameter (in.): 6
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0041
Height (ft.): 19 Diameter (in.): 4
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0042
Height (ft.): 19 Diameter (in.): 3
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0043
Height (ft.): 21 Diameter (in.): 8
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0044
Height (ft.): 19 Diameter (in.): 4
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0045
Height (ft.): 37 Length (in.): 24 Width (in.): 24
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0047
Height (ft.): 23 Length (in.): 9 Width (in.): 6
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0048
Height (ft.): 28 Diameter (in.): 18
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0049
Height (ft.): 17 Diameter (in.): 18
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0051
Height (ft.): 21 Diameter (in.): 4
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0052
Height (ft.): 27 Length (in.): 12 Width (in.): 12
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0053
Height (ft.): 19 Length (in.): 10 Width (in.): 12
NYTMN (km.): 4665.8 NYTME (km.): 215.4 Building: 01

Emission Point: E0054
Height (ft.): 21 Diameter (in.): 8
NYTMN (km.): 4665.8 NYTME (km.): 215.4

Emission Point: E0055
Height (ft.): 21 Diameter (in.): 8
NYTMN (km.): 4665.8 NYTME (km.): 215.4

Emission Point: E0056
Height (ft.): 15 Diameter (in.): 4
NYTMN (km.): 4665.8 NYTME (km.): 215.4

Emission Point: E0057
Height (ft.): 21 Diameter (in.): 8
NYTMN (km.): 4665.8 NYTME (km.): 215.4

Emission Point: E0058
Height (ft.): 21 Diameter (in.): 8
NYTMN (km.): 4665.8 NYTME (km.): 215.4

Emission Point: E0059
Height (ft.): 21 Diameter (in.): 8
NYTMN (km.): 4665.8 NYTME (km.): 215.4

Emission Point: E0060
Height (ft.): 21 Diameter (in.): 8
NYTMN (km.): 4665.8 NYTME (km.): 215.4

Condition 21: Process Definition By Emission Unit
Effective between the dates of 07/16/2015 and 07/15/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 21.1:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: R01 Source Classification Code: 3-13-065-99
Process Description:
This process contains three batch reactors used to produce formulated liquids needed in the manufacture of solid state electronic parts.

Emission Source/Control: C0001 - Control
Control Type: FABRIC FILTER

Emission Source/Control: S0001 - Process

Emission Source/Control: S0002 - Process

Emission Source/Control: S0003 - Process

Item 21.2:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: R03 Source Classification Code: 3-13-065-99
Process Description:
An A-Tank and a K-Tank mixer used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: C0001 - Control
Control Type: FABRIC FILTER

Emission Source/Control: S0007 - Process

Item 21.3:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: R04 Source Classification Code: 3-13-065-99
Process Description:
This process contains several mixers and a roll mill used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: C0002 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: C0003 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: S0009 - Process

Emission Source/Control: S0010 - Process

Emission Source/Control: S0011 - Process

Emission Source/Control: S0013 - Process

Emission Source/Control: S0015 - Process

Emission Source/Control: S0017 - Process

Emission Source/Control: S0018 - Process

Emission Source/Control: S0019 - Process

Item 21.4:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: R06 Source Classification Code: 3-13-065-99
Process Description:
This process contains several batch reactors, a mixer and a KADY disperser used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: C0004 - Control
Control Type: FABRIC FILTER

Emission Source/Control: S0033 - Process

Emission Source/Control: S0037 - Process

Emission Source/Control: S0039 - Process

Item 21.5:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: R08 Source Classification Code: 3-13-065-99
Process Description:
This process contains two batch reactors, a spray booth, a weigh station, a packaging table, a mixer, a pour hood and a rack hood all used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: C0004 - Control
Control Type: FABRIC FILTER

Emission Source/Control: S0029 - Process

Emission Source/Control: S0046 - Process

Emission Source/Control: S0047 - Process

Emission Source/Control: S0048 - Process

Emission Source/Control: S0049 - Process

Emission Source/Control: S0050 - Process

Emission Source/Control: S0051 - Process

Emission Source/Control: S0052 - Process

Item 21.6:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: R09 Source Classification Code: 3-13-065-99

Process Description:
This process contains 13 ovens and two packing hoods all used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: S0053 - Process

Emission Source/Control: S0055 - Process

Emission Source/Control: S0057 - Process

Emission Source/Control: S0058 - Process

Emission Source/Control: S0059 - Process

Emission Source/Control: S0060 - Process

Emission Source/Control: S0061 - Process

Emission Source/Control: S0062 - Process

Emission Source/Control: S0063 - Process

Emission Source/Control: S0100 - Process

Emission Source/Control: S0101 - Process

Emission Source/Control: S0103 - Process

Emission Source/Control: S0104 - Process

Emission Source/Control: S0105 - Process

Emission Source/Control: S0106 - Process

Item 21.7:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: R10 Source Classification Code: 3-13-065-99
Process Description:
This process contains a flash dryer and a mixer both used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: C0005 - Control
Control Type: FABRIC FILTER

Emission Source/Control: S0064 - Process

Emission Source/Control: S0065 - Process

Item 21.8:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: R11 Source Classification Code: 3-13-065-99
Process Description:
This process contains seven (7) ribbon blenders, two grinders and two weigh stations used to produce molding powders and coating powders.

Emission Source/Control: C0006 - Control
Control Type: FABRIC FILTER

Emission Source/Control: C0008 - Control
Control Type: FABRIC FILTER

Emission Source/Control: C0015 - Control
Control Type: FABRIC FILTER

Emission Source/Control: C0016 - Control
Control Type: FABRIC FILTER

Emission Source/Control: C0017 - Control
Control Type: FABRIC FILTER

Emission Source/Control: C0018 - Control
Control Type: FABRIC FILTER

Emission Source/Control: C0019 - Control
Control Type: FABRIC FILTER

Emission Source/Control: S0066 - Process

Emission Source/Control: S0067 - Process

Emission Source/Control: S0068 - Process

Emission Source/Control: S0069 - Process

Emission Source/Control: S0070 - Process

Emission Source/Control: S0071 - Process

Emission Source/Control: S0072 - Process

Emission Source/Control: S0075 - Process

Emission Source/Control: S0076 - Process

Emission Source/Control: S0077 - Process

Item 21.9:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: R12 Source Classification Code: 3-13-065-99
Process Description:
This process contains six (6) extruders and a central vacuum exhaust system used to produce molding powders and coating powders.

Emission Source/Control: C0014 - Control
Control Type: FABRIC FILTER

Emission Source/Control: S0078 - Process

Emission Source/Control: S0079 - Process

Emission Source/Control: S0080 - Process

Emission Source/Control: S0081 - Process

Emission Source/Control: S0082 - Process

Emission Source/Control: S0083 - Process

Emission Source/Control: S0102 - Process

Item 21.10:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: R13 Source Classification Code: 3-13-065-99
Process Description:
This process contains two extruders and a grinder to produce scale up quanities of molding powders and coating powders.

Emission Source/Control: C0009 - Control
Control Type: FABRIC FILTER

Emission Source/Control: S0086 - Process

Emission Source/Control: S0087 - Process

Emission Source/Control: S0088 - Process

Item 21.11:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: R14 Source Classification Code: 3-13-065-99
Process Description:
This process contains packaging and classifing equiptment used to produce molding powders and coating powders.

Emission Source/Control: C0010 - Control

Control Type: FABRIC FILTER

Emission Source/Control: S0091 - Process

Emission Source/Control: S0092 - Process

Emission Source/Control: S0094 - Process

CITY OF OLEAN
WASTEWATER DISCHARGE PERMIT NO. E-1-18

PERMIT NO. E-1-18

City of Olean
Industrial Pretreatment Program
WASTEWATER DISCHARGE PERMIT

In accordance with all terms and conditions of the City Code of Ordinances, Chapter 27, et. seq., and with any applicable provisions of Federal or State law or regulation, permission for the contribution of wastewaters containing regulated pollutants into the City of Olean sewage system is hereby granted to:

SolEpoxy, Inc.
211 Franklin Street
Olean, NY 14760

Responsible Person: Robert Groele
Title: VP Engineering
Telephone: 716-372-6300 X-290 e-mail: Robert.groele@solepoxy.com

Facility Representative: Mark Wendel
Title: Maintenance Manager
Telephone: 716-372-6300 X-239 e-mail: mark.wendel@solepoxy.com

Facility Representative:
Title:
Telephone: 372-6300 e-mail:

STANDARD INDUSTRIAL CLASSIFICATION CODE: **3087**

This permit is granted in accordance with the application filed in May of 2018 and in conformity with any plans, specifications and other data submitted in support of the above application, all of which are filed with and considered a part of this permit. In addition, the following general and special conditions are a part of this permit. Any part of this permit, may be modified at any time during the period it is in force.

Effective: **June 1, 2018**
Expires : **May 31, 2021**

Approved by:	Mayor, City of Olean		WWTP Chief Operator
Name:	William Aiello	OR	Brad Camp
Signature:			
Date:			5/8/18

GENERAL PROVISIONS

G-1. CORRESPONDENCE

All submittals and correspondence should be addressed to :

Wastewater Treatment Plant Chief Operator
City of Olean Wastewater Treatment Plant
174 S. 19th Street
Olean, New York 14760

G-2. SPILL PREVENTION CONTROL PROGRAM

The industrial user shall take all reasonable precautions to prevent accidental spills in order to eliminate or minimize the accidental or slug discharge of pollutants into the sewer system.

The industrial user shall notify the City immediately upon any accidental or slug discharge to the sanitary sewer. Formal written notification discussing circumstances and remedies shall be submitted to the City within 5 days of the occurrence.

G-3. DILUTION

No industrial user shall increase the use of potable or process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

G-4. PROPER DISPOSAL OF PRETREATMENT SLUDGES AND SPENT CHEMICALS

The disposal of sludges and spent chemicals generated shall be done in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act and any other applicable statutes or regulations pertaining to disposal of sludges and spent chemicals.

All industrial users must notify in writing the POTW, the New York State Department of Environmental Conservation and the United States Environmental Protection Agency of any discharge that would be considered a hazardous waste if disposed of in a different manner.

G-5. PROHIBITIONS

No industrial user may discharge any pollutant that may create an explosive hazard including but not limited to wastestreams with a closed cup flash point of less than 140° F or 60° C using testing methods specified in 40 CFR 261.21.

No industrial user shall discharge petroleum oil, non- biodegradable cutting oil, products of mineral oil origin in amounts that will cause interference or pass through.

No industrial user shall discharge any pollutant that may result in the presence of toxic gases, vapors or fumes in a quantity that may cause acute worker health and/or safety problems.

G-6. SIGNATORY REQUIREMENTS

All reports required by this permit shall be signed by a principal executive officer of the user, or his designee. Electronic submittal of permit applications, reports and other correcpondence shall be documented in a letter bearing an appropriate signature.

G-7. CHANGE IN DISCHARGE

The industrial user shall promptly and as soon as possible notify the City in advance of the introduction of new wastewater or pollutants or any substantial change in the volume or characteristics of the wastewater being introduced into the public sewers from the user's industrial processes including listed or characteristic hazardous wastes. The notification shall be in conformance with 40CFR Part 122.41(l)(i) and 40CFR 403.12(p). Formal written notification shall follow within 30 days of such introduction.

G-8. FAILURE TO REAPPLY

The City may seek temporary restraining orders, plug or disconnect service or permanent injunctions if there is an imminent danger to health, safety or property when after inspection, monitoring or analysis it is determined that the discharge or wastewater to the sanitary sewer is in violation of Federal, State or local laws, ordinances or regulations.

G-9. LIMITATION OF PERMIT TRANSFER

Wastewater discharge permits are issued to a specific user for a specific operation and are not assignable to another user or transferable to any other location without the prior written approval of the City. Sale of a user shall obligate the purchaser to seek prior written approval of the City for continued discharge to the sewage system.

G-10. FALSIFYING INFORMATION OR TAMPERING WITH MONITORING EQUIPMENT

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, may result in punishment under the criminal laws of the City, as well as being subjected to civil penalties and relief.

G-11. MODIFICATION OR REVISION OF THE PERMIT

a) The terms and conditions of this permit may be subject to modification by the City at any time as limitations or requirements as identified by the City's Ordinance, are modified or other just cause exists.
b) This permit may also be modified to incorporate special conditions resulting from the issuance of a special order.
c) The terms and conditions may be modified as a result of EPA promulgating a new Federal pretreatment standard.

G-12. DUTY TO REAPPLY

Within ninety (90) days of the notification, the user shall reapply for reissuance of the permit on a form provided by the City.

G-13. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

SAMPLING and ANALYSES

S-1. SAMPLE METHODS

Wastewater discharge samples and analyses and flow measurements taken as required in this permit shall be representative of the volume and character of the permitted discharge. Sampling and analytical methods shall be in accordance with accepted National Environmental Laboratory Approval Program (NELAP) protocol. Contracted laboratories must be NELAP certified by the New York State Department of Health.

S-2. SAMPLING MANHOLE

The industrial user shall construct a sampling manhole if the Wastewater Treatment Plant Chief Operator, or the Director of Public Works, determines such sampling point is required.

S-3. SAMPLING – NOTIFICATION

The permittee shall notify the Wastewater Treatment Plant Chief Operator, at least one week prior to conducting self-monitoring for the purpose of taking wastewater discharge samples for analysis,

S-4. SAMPLE ANALYSES- REQUIREMENTS

The industrial user is required to monitor the parameters listed for each sample point.

SAMPLE POINT: mixing chamber (in liquids room)		
PARAMETER	**DISCHARGE LIMITS**	**SAMPLE TYPE**
pH	6.0-9.0	4 Grabs (TAKEN WITHIN 24 HOUR PERIOD)
Oil and Grease	50 mg/l (DAILY MAXIMUM)	4 Grabs (TAKEN WITHIN 24 HOUR PERIOD)
1,1,1-Trichloroethane	0.049 mg/l (DAILY MAXIMUM)	4 Grabs (TAKEN WITHIN 24 HOUR PERIOD)
Trichloroethylene	1.0 mg/l (DAILY MAXIMUM)	24 Hour Composite (flow based)
Chromium (+6)	1.5mg/l (DAILY MAXIMUM)	24 Hour Composite (flow based)
Copper (Total)	2.1 mg/l (DAILY MAXIMUM)	24 Hour Composite (flow based)
Cadmium (Total)	1.0 mg/l (DAILY MAXIMUM)	24 Hour Composite (flow based)
Lead (Total)	5.0 mg/l (DAILY MAXIMUM)	24 Hour Composite (flow based)
Nickel (Total)	0.9 mg/l (DAILY MAXIMUM)	24 Hour Composite (flow based)
Zinc (Total)	3.5 mg/l (DAILY MAXIMUM)	24 Hour Composite (flow based)
Arsenic (Total)	0.02 mg/l (DAILY MAXIMUM)	24 Hour Composite (flow based)
Mercury (Total)	0.05 mg/l (DAILY MAXIMUM)	24 Hour Composite (flow based)
Silver (Total)	5.0 mg/l (DAILY MAXIMUM)	24 Hour Composite (flow based)
BOD_5	250 mg/l*	24 Hour Composite (flow based)
TSS	250 mg/l*	24 Hour Composite (flow based)
Flow	Monitor	24 Hr. Total

*Five (5) day Biochemical Oxygen Demand and Total Suspended Solids discharges greater than 250 mg/l shall be subject to review and approval by the WWTP Chief Operator or the Director of Public Works.

Other pollutants, as specified by the City, shall be sampled on a schedule determined by the City if said additional monitoring is deemed necessary by the City in order to assure compliance with City, State and Federal standards.

S-5 SAMPLE ANALYSES – REPORTING

The industrial user is required to submit to the City a self monitoring report on the analytical results of its sampling **May 15** and **October 15** of each year.

A statement shall be included in all monitoring reports pertaining to the protocols used during the sampling and/or analyses. A proper monitoring report shall contain the following information:

- Exact time and place of sample
- Dates of sample
- Dates analyses were performed
- Person performing sampling and/or analyses
- Analytical techniques or methods used
- Analytical results including proper units
- A map indicating sampling location
- Chain of Custody Log

If sampling by the industrial user indicates a violation, the user must notify the City within 24 hours of becoming aware of the violation. The industrial user must also resample and submit results of this resampling to the City within thirty (30) days.

INSPECTION

I-1. RIGHT OF ENTRY

The industrial user shall, after reasonable notification by the City, allow the City or its representative, exhibiting proper credentials and identification, to enter upon the premises of the user, at all reasonable hours, for the purposes of inspection, sampling, or records inspection. Reasonable hours in the context of inspection and sampling includes any time the industrial user is operating any process which results in a process wastewater discharge to the City's sewage system.

I-2. RECORDS RETENTION

a) The industrial user shall retain and preserve for no less than three (3) years, any records, books, documents, memoranda, reports, correspondence and any and all summaries thereof, relating to monitoring, sampling and chemical analyses made by or in behalf of the user in connection with its discharge.

b) All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the City shall be retained and preserved by the industrial user until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

COMPLIANCE

C-1. CITY ORDINANCE

The industrial user shall comply will all the general discharge standards of the City Sewer Use Ordinance (Chapter 27, City Code).

C-2. COMPLIANCE SCHEDULE

In order to meet the wastewater discharge limitations specified elsewhere in this permit, the industrial user may be required to make in-plant process modifications and install a treatment facility. The following construction schedule, if applicable, shall be adhered to and reports on progress shall be submitted to the City, as outlined below:

TASK	COMPLIANCE DATE	APPLICABILITY
Submit baseline monitoring report	NA	Not Applicable at time of issue
Investigate in-plant process modifications and treatment options.	NA	Not Applicable at time of issue
Complete preliminary engineering	NA	Not Applicable at time of issue
Go out to bid	NA	Not Applicable at time of issue
Secure equipment and begin construction	NA	Not Applicable at time of issue
Complete installation	NA	Not Applicable at time of issue
Pretreatment system start-up	NA	Not Applicable at time of issue
Achieve final compliance	NA	Not Applicable at time of issue

C-3. PROGRESS REPORT

Not later than fourteen (14) days following each date in the compliance schedule, the industrial user shall submit a progress report to the City. This report must indicate whether or not the increment of progress was met on the date, the reason(s) for any delay, and what steps are being taken by the user to return to the schedule established. In no event shall more than nine (9) months elapse between such progress reports to the City.

C-4. FINAL COMPLIANCE REPORT

Within 90 days following the final compliance date, the industrial user shall submit a final compliance report. The industrial user will be required to sample its wastewater for the pollutants specified in S-4, and report compliance. Any reasons for not complying and any steps being taken by the user to comply shall be part of the report.

C-5. PRETREATMENT FAILURE

Any upset experienced by the industrial user of its treatment that places it in a temporary state of non-compliance with wastewater discharge limitations contained in this permit or other limitations specified in the City's Ordinance shall be reported to the City within 24 hours of first awareness of the commencement of the upset. A detailed report shall be filed within 5 days. Additionally any violation for any reason, including but not limited to routine monitoring shall be reported within 24 hours of violation detection and the permittee must conduct resampling within 30 days.

C-6. CIVIL AND CRIMINAL PENALTIES

By resolution the Common Council has adopted an Enforcement Response Plan which was previously mailed to permit holders on March 28, 1990 and which is made part of this permit by reference.

Any industrial user who fails to comply with any provisions of the City of Olean sewer use ordinance or this permit may be liable to monetary forfeitures. Fines for significant noncompliance shall be $1,000.00 per day. The continued violation of any provision shall constitute a separate offense for each and every day such violation shall continue.

The City may hold hearings regarding violations and depending upon the outcome of the hearings the director may revoke or suspend the industrial user's permit to discharge.

C-7. SIGNIFICANT NONCOMPLIANCE

Significant noncompliance involving discharge violations will be calculated on the basis of "rolling quarters". Significant noncompliance shall be based upon data for the previous six (6) months. Quarters shall end on March 31, June 30, September 30 and December 31 of each calendar year.

Significant noncompliance means any violation or group of violations that meets one or more of the following criteria:

- Chronic violations of wastewater discharge limits, defined here as those in which sixty-six (66) percent or more of all of the measurements taken for the same pollutant parameter during a six (6) month period exceed (by any magnitude) a numeric pretreatment standard or requirement, including instantaneous limits, as defined by 40 CFR 403.3(l);
- Technical Review Criteria (TRC) violations, defined here as those in which thirty-three (33) percent or more of all of the measurements for each pollutant parameter taken during a six (6) month period equal or exceed the product of the numeric pretreatment standard or requirement, including instantaneous limits, as defined by 40 CFR 403.3(l) multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oil and grease, and 1.2 for all other pollutants except pH);
- Any other violation of a pretreatment effluent limit (daily maximum or longer-term average, instantaneous limit, or narrative standard) that the City of Olean determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of Wastewater Treatment Plant personnel or the general public);
- Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the Wastewater Treatment Plant's exercise of its emergency authority to halt or prevent any such discharge;
- Failure to meet, within ninety (90) days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance.
- Failure to provide, within thirty (30) days after the due date, required report such as baseline monitoring reports, ninety (90) day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;
- Failure to accurately report noncompliance;
- Any other violation or group of violations, which may include a violation of Best Management Practices, which the City of Olean determines will adversely affect the operation or implementation of the City's pretreatment program.