

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Office of General Counsel, Region 4
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CERTIFIED - RETURN RECEIPT REQUESTED
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May 31, 2018

Larry Schillinger, Esq.
PO Box 11182
Albany NY 12211

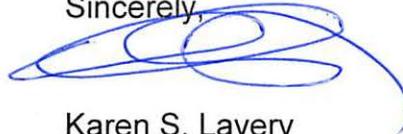
Re: Order on Consent
R4-2016-0808-137
E-Lot Electronics Recycling, Inc.

Dear Mr. Schillinger:

Enclosed please find a copy of the fully executed Order on Consent referenced above.

This will also acknowledge receipt of \$5,700 1st of 6 payments of the civil penalty pursuant to Paragraph I. Your second payment of \$2,000 is due on or before June 21, 2018.

Sincerely,



Karen S. Lavery
Assistant Regional Attorney
Region 4

Enclosure

ec: A. Elliott

**STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

In the Matter of the Violations
of Article 27 of the New York State
Environmental Conservation Law,
and Title 6, Part 360
et seq. of the Official
Compilation of Codes, Rules and
Regulations of the State of New York,

ORDER ON CONSENT
File No. R4-2016-0808-137

- by -

E-Lot Electronics Recycling, Inc.
64 Hannay Lane
Glenmont, NY 12077

Respondent

WHEREAS:

Jurisdiction

1. The Department of Environmental Conservation (“Department”) is empowered to regulate the operation of solid waste management facilities pursuant to ECL Article 27.
2. Respondent E-Lot Electronics Recycling, Inc., operates an electronics recycling facility located at 64 Hannay Lane, Glenmont, New York (“facility”).
3. Department staff inspected the facility on April 26, 2016.

First Violation

4. Regulations at 6 NYCRR 364.1(e)(ii), 364.2(a)(1) through (3), 364.2(c)(2) and (3), and 372.3(a)(1) require E-Lot to comply with the waste transporter permit requirements or meet the small quantity exemption. Specifically, regulations at 6 NYCRR 364.1(e)(ii) provide that any person who transports less than 500 pounds of nonhazardous industrial/commercial waste or universal waste as defined in Part 370 and regulated in Subpart 374-3 of this Title in any single shipment is exempt from the requirements of this Part.

Regulations at 6 NYCRR 364.2(a)(1) through (3) provide that:
“(a) No person shall, except pursuant to and in accordance with a valid permit issued pursuant to this Part:
(1) collect or remove any regulated waste from its point of origin, generation or occurrence;

*(2) transport any regulated waste; and
(3) deliver any regulated waste to a treatment, storage or disposal facility, or otherwise dispose of or relinquish possession of any regulated waste other than as specified in such permit.”*

Regulations at 364.2(c)(2) and (3) provide that:

“(c) The transporter of regulated waste shall not be required to obtain a permit pursuant to this Part if the transporter has contracted with a generator of such waste who has been issued a valid permit pursuant to this Part, provided that:

*(2) the transporter does not transport any regulated waste other than those specified on the generator's permit while operating under the provisions of such permit; and
(3) the transporter does not dispose of, deliver or otherwise relinquish possession of any generator's regulated waste to any place other than that designated in the generator's permit.”*

Regulations at 372.3(a)(1) provide that:

“(1) Transporters of hazardous waste must comply with all provisions of Part 364 of this Title, "Waste Transporter Permits," and be permitted under the provisions of that regulation to transport hazardous waste in New York State.”

5. Department staff determined that Respondent transported more than 500 lbs of universal waste (“UW”) in a single shipment to American Lamp Recycling (“ALR”) located in Marlboro, NY. The waste shipped on the following dates:

185 lbs of hazardous waste and 5,000 lbs of universal waste on 8/10/2015
5,000 lbs on 8/19/2015 (UW)
5,000 lbs on 8/26/2015 (UW)
5,000 lbs on 10/23/2015 (UW)
5,000 lbs on 11/6/2015 (UW)

6. Respondent does not meet the small quantity exemption and is not permitted to transport shipments of UW weighing greater than 500 lbs to destination facilities unless the facilities are listed on their Part 364 transporter permit. Respondent’s transporter permit does not specify ALR as a destination facility for universal waste or hazardous waste. Respondent routinely performs UW pick-ups in the course of a day that meet or exceed 500 lbs and delivers the UW to Respondent’s warehouse in Glenmont for processing. Respondent’s permit does not specify Respondent’s warehouse in Glenmont, NY as a destination facility. As such, Respondent is in violation of regulations at 6 NYCRR 364.1(e)(ii), 364.2(a)(1) through (3), 364.2(c)(2) and (3) and 372.3(a)(1).

Second Violation

7. Regulations at 6 NYCRR 364.6 (e) provide that *“A permittee shall submit a report to the department annually, or more frequently if the department deems necessary, on forms prescribed by the department. A permittee shall retain for three years the records on which such reports are based, and shall make such records available, upon request, to the department during normal business hours.”*

8. Respondent submitted an annual transporter report that did not list any waste for calendar year 2015 when, in fact, Respondent transported regulated hazardous waste and/or universal waste lamps to ALR on the dates indicated in Violation No. 1, which is in violation of regulations at 6 NYCRR 364.6 (e).

Third Violation

9. Regulations at 6 NYCRR 364.1(c)(12) provide that “*Storage incidental to transport means any on-vehicle storage which occurs enroute from the point of initial waste pickup to the point of final delivery for purposes such as, but not limited to, overnight on-the-road stops, stops for meals, fuel and driver comfort, stops at the transporter's facility for weekends immediately prior to shipment, or on-vehicle storage not to exceed 10 days at the transporter's facility for the express purpose of consolidating loads (where such loads are not removed from their original packages or containers) for delivery to an authorized treatment, storage or disposal facility.*”

Regulations at 6 NYCRR 364.1(c)(14) provide that “*Transfer incidental to transport means any transfer of waste material associated with storage incidental to transport where such material is not unpackaged, mixed or pumped from one container or truck into another.*”

Regulations at 6 NYCRR 372.3(a)(1) provides that “*Transporters of hazardous waste must comply with all provisions of Part 364 of this Title, "Waste Transporter Permits," and be permitted under the provisions of that regulation to transport hazardous waste in New York State.*”

Regulations at 6 NYCRR 372.3(a)(7) provides that “*Transporters are permitted to transfer hazardous waste, incidental to transport, provided that:*

(i) [Reserved]

(ii) transfer of hazardous waste from one transporter to another is indicated on the manifest as Second Transporter; and

(iii) if consolidation of loads takes place by moving containers from one transport vehicle to another or containers are removed from transport vehicles prior to being reloaded, the transfer or storage area must be designed to meet secondary containment requirements in accordance with section 373-2.9(f) of this Title.”

10. As part of Respondent’s operation, Respondent manages crushed glass, a RCRA regulated hazardous waste, from off-site generators. Respondent routinely stores this waste greater than 10 days to consolidate the loads. This is substantiated by the amount of waste being shipped and the length of time between shipments of crushed glass to ALR. For example, crushed glass was shipped from Respondent’s facility on the following dates: 8/10/2015, 9/21/2015, 12/23/2015, 1/29/2016, and 3/9/2016.

11. Respondent violated regulations at 6 NYCRR 364.1(c)(12) & (14), 372.3 (a)(1) and (a)(7) by storing hazardous waste received from an off-site generator for over 10 days without being in possession of a RCRA hazardous waste permit.

Fourth Violation

12. Regulations at 6 NYCRR 372.2(b)(3)(iii) requires the generator to “*retain one copy of the manifest in accordance with subparagraph (c)(1)(i) of this section, and mail one copy of the manifest form to the generator state and mail only copy of the manifest form to the destination state (if different from the generator state), making legible photocopies as necessary, postmarked within 10 calendar days of shipment date. Mail the department copy to: New York State Department of Environmental Conservation, Division of Solid & Hazardous Materials, Manifest Section, 625 Broadway, Albany, NY 12233-7252. Generators do not need to distribute manifest copies to states other than New York, if those states do not require such a copy be submitted to them. The generator must give the transporter the remaining copies of the manifest.*”

13. Respondent was listed as the generator on manifested shipments of crushed glass to ALR. As the generator, Respondent is responsible for submitting a copy to the state. The manifests for the shipments on 9/21/2015 and 12/23/2015 were not submitted to the state which is in violation of regulations at 6 NYCRR 372.2(b)(3)(iii).

Fifth Violation

14. Regulations at 6 NYCRR 374-3.3(c)(1)(i) provide that “*except as provided in subparagraphs (ii) and (iii) of this paragraph, a large quantity handler of universal waste must have sent written notification of universal waste management to the EPA regional administrator, and received an EPA identification number, before meeting or exceeding the 5,000 kilogram storage limit.*”

15. Respondent failed to notify the EPA to obtain an EPA identification (“ID”) number when they moved from Troy, NY to Glenmont, NY which is in violation of regulations at 6 NYCRR 374-3.3(c)(1)(i). The transporter EPA ID number for Respondent is transferrable, however, the universal waste handler activities and any generator activities for hazardous waste over 220 lbs per month are not transferrable. Therefore, a unique identification number for Respondent’s Glenmont facility is required. On May 26, 2016, it was determined that Respondent is a “non-notifier.” Based on this information, EPA assigned Respondent an ID number that was previously assigned to 64 Hannay Lane. The ID number Respondent must use is NYR000019430.

Sixth Violation

16. Regulations at 6 NYCRR 374-3.3(d)(4)(i) provide that “*a large quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.*”

17. Numerous lamps were being stored in open containers in violation of regulations at 6 NYCRR 374-3.3(d)(4)(i). Due to the lack of aisle space, a precise count of unboxed lamps or open boxes was not possible. At least 20 open containers and additional bundles of unpackaged lamps were observed.

Seventh Violation

18. Regulations at 6 NYCRR 374-3.3(d)(4)(ii) provide that *“a large quantity handler of universal waste must immediately clean up and place in a container any lamp that is broken and must place in a container any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment. Containers must be closed, structurally sound, compatible with the contents of the lamps and must lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment under reasonably foreseeable conditions.”*

19. At the time of the inspection, broken lamps were observed on the floor in more than one location within the facility, in violation of regulations at 6 NYCRR 374-3.3(d)(4)(ii). Due to a lack of aisle space, a precise count of areas where broken glass may also have occurred was not possible. Department staff observed at least five areas where broken glass occurred and was not immediately cleaned up.

Eighth Violation

20. Regulations at 6 NYCRR 374-3.3(e)(1) requires that *“universal waste batteries (i.e., each battery), or a container or tank in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: “universal waste - battery(ies),” or “waste battery(ies),” or “used battery(ies).”*

21. Boxes containing lead-acid, nickel cadmium and lithium batteries were not marked with the appropriate words. Due to the lack of aisle space and the height and manner in which the UW battery containers were stored, it was not possible to obtain a precise count of all the unlabeled UW waste battery containers. There were approximately 10 unlabeled UW battery containers observed which is in violation of regulations at 6 NYCRR 374-3.3(e)(1).

Ninth Violation

22. Regulations at 6 NYCRR 374-3.3(e)(5) requires that *“each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with any one of the following phrases: Universal Waste-Lamp(s), or Waste Lamp(s), or Used Lamp(s).”*

23. Boxes containing lamps were not marked with the appropriate words which is in violation of regulations at 6 NYCRR 374-3.3(e)(5). Due to the lack of aisle space and the manner in which the boxes were stacked, it was not possible to obtain a precise count of the unlabeled UW containers, however, Department staff observed at least 20 unlabeled UW lamp containers and another 30 uncontainerized lamps that were not properly labeled.

Tenth Violation

24. Regulations at 6 NYCRR 374-3.3(f)(3) require that:

“A large quantity handler of universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by:

(i) placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;

(ii) marking or labeling the individual item of universal waste (e.g., each battery or thermostat) with the date it became a waste or was received;

(iii) maintaining an inventory system on-site that identifies the date the universal waste being accumulated became a waste or was received;

(iv) maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received;

(v) placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received; or

(vi) any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.”

25. Respondent failed to demonstrate the length of time the items were accumulated and therefore violated regulations at 6 NYCRR 374-3.3(f)(3) for the following reasons:

- Not all of the containers of universal waste were dated with an accumulation start date.

- The log book that workers used to record incoming UW does not reference the location in the warehouse to find particular containers, and therefore, cannot be used to determine the accumulation start dates.

- Some items are repacked upon entering the warehouse which makes it impossible to determine accumulation start dates when the larger containers are not dated.

- Due to the crowded manner in which the containers were stored, it did not appear that Respondent employs a first-in-first-out system for turning over inventory.

- Records on battery shipments were requested by the Department on May 17, 2016 and Respondent provided two shipping papers dated April 19, 2016 and April 22, 2016 on May 18, 2016. No other shipping records were provided by Respondent to show a consistent movement of batteries from the warehouse.

- Shipping records supplied by ALR show pallets of lamps being shipped regularly, however, the shipments do not equal what Department staff estimate can be or is stockpiled at the warehouse.

- Therefore, Department staff estimates that there were at least 100 containers or loose items for which Respondent could not demonstrate the length of time that they had been stored.

Eleventh Violation

26. Regulations at 6 NYCRR 374-3.3(h)(1) provides that A large quantity handler of universal waste must immediately contain all releases of universal wastes and other residues from universal wastes.

27. At the time of the inspection, Department staff observed broken lamps in different locations throughout the facility on the floor or in open boxes that were not immediately containerized, which is in violation of regulations at 6 NYCRR 374-3.3(h)(1). Due to the lack of aisle space, a precise count could not be made of the areas where uncontainerized broken glass may have also occurred. Department staff observed at least five areas where broken glass was not containerized.

Twelfth Violation

28. Regulations at 6 NYCRR 374-3.3(h)(2) provide that *“a large quantity handler of universal waste must determine whether any material resulting from the release is hazardous waste, and if so, must manage the hazardous waste in compliance with all applicable requirements of Parts 370 through Subpart 374-1 and Part 376 of this Title. The handler is considered the generator of the material resulting from the release, and is subject to Part 372 of this Title.”*

29. The broken glass on the floor was not immediately containerized in a *“Hazardous Waste”* container which is in violation of regulations at 6 NYCRR 374-3.3(h)(2). Due to the manner in which items were being stored, it was not possible to obtain a precise count of areas where uncontainerized broken glass occurred. Department staff observed at least five areas where broken glass was not containerized as *“Hazardous Waste.”*

Thirteenth Violation

30. Regulations at 6 NYCRR 374-3.3(i)(1)(i) requires *“A large quantity handler of universal waste is prohibited from sending or taking universal waste to a place other than another universal waste handler, a destination facility, or a foreign destination.”*

31. On May 2, 2016, Respondent mixed hazardous batteries in with their load of scrap metal which is a violation of regulations at 6 NYCRR 374-3.3(i)(1)(i). The metal handler, who is not a handler of UW batteries, refused the load and cancelled Respondent's account.

Fourteenth Violation

32. Regulations at 6 NYCRR 374-3.3(i)(1)(ii) requires *“When universal waste is being transported off site, the requirements of Part 364 of this Title must be met.”*

33. As indicated in Violation Number One (Paragraphs 4-6 above) Respondent shipped greater than 500 lbs of universal waste lamps to ALR on at least five occasions as represented by the manifests attached to the inspection report. Respondent's Part 364 transporter permit does not list ALR as a destination facility for non-hazardous industrial/commercial waste which is in violation of regulations at 6 NYCRR 374-3.3(i)(1)(ii).

Fifteenth Violation

34. ECL 27-2613(3)(c)(i) requires that *"Each person operating an electronic waste recycling facility shall: manage and recycle electronic waste in a manner that complies with all applicable laws, rules and regulations."*

35. At the time of the inspection, there were two broken cathode ray tube ("CRT") televisions observed: one loose on the floor with a shattered tube and a second broken 12" unit which was not properly contained on a shrink wrapped pallet, which is in violation of ECL 27-2613(3)(c)(i).

Sixteenth Violation

36. ECL 27-2613(3)(c)(ii) provides that *"Each person operating an electronic waste recycling facility shall: store electronic waste (A) in a fully enclosed building with a roof, floor and walls, or(B) in a secure container (e.g., package or vehicle), that is constructed and maintained to minimize breakage of electronic waste and to prevent releases of hazardous materials to the environment."*

37. At the time of the inspection, there was a large roll-off container adjacent to the loading area outside the facility that was full of both exempt scrap metal and covered electronic equipment This container was uncovered and unsecured which is in violation of ECL 27-2613(3)(c)(ii).

Seventeenth Violation

38. ECL 27-2613(3)(c)(v) requires the recycler to remove electronic waste from the site within one year of the waste's receipt at the site, and maintain records demonstrating compliance with this requirement.

39. At the time of the inspection there were numerous pallets of e-waste which were not dated nor were records available indicating storage time which is in violation of ECL 27-2613(3)(c)(v).

Civil Penalty

40. ECL 71-2703 provides that any violator of Articles 3 or 7 of the provisions of Article 27 of the ECL cited in this Order, or any rule or regulation issued pursuant thereto, is subject to penalties of up to seven thousand five hundred dollars (\$7,500) for each violation and an additional penalty of not more than \$1,500 per day during which the violation continues and may be enjoined from continuing such violation.

41. Environmental Conservation Law Section 71-2705 provides for civil sanctions for violations of Article 27, Title 9 and the regulations promulgated pursuant thereto, or any term or condition of any certificate or permit issued pursuant thereto, or any final determination or order of the commissioner made pursuant to Article 71 Title 27. Sanctions include penalties of up to \$37,500 per day per violation.

Waiver of Hearing

42. Respondent has affirmatively waived its right to notice and hearing in the manner provided by law and has consented to the issuing and entering of this Order and agrees to be bound by its terms, provisions and conditions contained within the Order. NOW, being duly advised and having considered this matter, **IT IS HEREBY ORDERED THAT:**

I. Penalty

Respondent is hereby assessed a civil penalty in the amount of FIFTEEN THOUSAND SEVEN HUNDRED DOLLARS (\$15,700) for the violations stated herein. The civil penalty shall be paid with the return of the signed and notarized Order. Payment shall be made by bank or certified check or money order made out to the Department of Environmental Conservation.

Payment of the civil penalty is due in accordance with the following schedule:

1. \$5,700 with the return of the signed and notarized copy of this Order;
2. \$2,000 by June 21, 2018;
3. \$2,000 by July 26, 2018;
4. \$2,000 by August 23, 2018;
5. \$2,000 by September 20, 2018;
6. \$2,000 by October 25, 2018;

The failure to make a timely payment shall result in the entire balance of civil penalty being immediately due. The civil penalty shall be paid by certified or bank check made payable to the NYS DEC.

Payment of the above penalties shall not in any way alter Respondent's obligation to complete performance under the terms of this Order.

II. Force Majeure

Respondent shall not be in default of compliance with this Order if it is unable to comply with any provision of this Order solely because of an action of a national government or court, or an act of nature, war, strike, riot or catastrophe, as to any of which the negligence or willful misconduct of Respondent was not a proximate cause. Respondent shall notify DEC in writing immediately upon obtaining knowledge of any such event. Relief under this clause shall not be available if Respondent fails to timely comply with the notice requirement set out in this paragraph.

III. Communications

All communications required herein shall be made to: Department -- DEC Region 4, 1130 North Westcott Road, Schenectady, NY 12306, Attn: Regional Materials Management Engineer.

IV. Access

Respondent shall allow duly authorized representatives of DEC access to the facility referred to in this Order without prior notice, at such times as may be desirable or necessary in order for DEC to inspect and determine the status of Respondent's compliance with this Order or the ECL.

V. Summary Abatement

This Order shall not be construed to prohibit the Commissioner or his duly authorized representative from exercising any summary abatement powers, either at common law or as granted pursuant to statute or regulation.

VI. Indemnification

Respondent shall indemnify and hold DEC, New York State, and their representatives and employees harmless for all claims, suits, damages, and costs of every name and description arising out of or resulting from the fulfillment or attempted fulfillment of the provisions hereof by Respondent, its directors, officers, employees, servants, agents, successors or assigns.

VII. Review of Submittals

1. All documents which Respondent must submit pursuant to this Order are subject to Department approval.

2. The Department shall review each of the submittals Respondent makes pursuant to this Order to determine whether it was prepared, and whether the work done to generate the data and other information in the submittal was done, in accordance with this Order and generally accepted technical and scientific principles. The Department shall notify Respondent in writing of its approval or disapproval of the submittal. All Department-approved submittals shall be incorporated into and become an enforceable part of this Order; and Respondent shall implement them in accordance with their respective schedules and terms, as approved.

3.a. If the Department disapproves a submittal, it shall so notify Respondent in writing and shall specify the reasons for its disapproval. Within the time frame set forth in that written notification, Respondent shall make a revised submittal to the Department that addresses and resolves all of the Department's stated reasons for disapproving the first submittal.

b. After receipt of the revised submittal, the Department shall notify Respondent in writing of its approval or disapproval. If the revised submission is not approvable as submitted, the Department, at its option, may disapprove it or may approve it on condition that Respondent accepts such modifications as may be specified by Department to make it approvable. If Respondent does not accept such modifications, the revised submission will be disapproved. If the Department disapproves the revised submittal, Respondent shall be in violation of this Order. If the Department approves the revised submittal, it shall be incorporated into and become an enforceable part of this Order.

4. Respondent shall modify and/or amplify and expand a submittal upon the Department's direction to do so if the Department determines, as a result of reviewing data generated by an activity required under this Order or as a result of reviewing any other data or facts, that further work is necessary. The Department agrees that any modifications it specifies will be reasonable and consistent with customary engineering standards.

VIII. Binding Effect

The provisions of this Order shall inure to the benefit of and be binding upon the Department and Respondent and its successors (including successors in title) and assigns.

IX. Modification

No change in this Order shall be made or become effective except as set forth by a written order of the Commissioner or the Commissioner's designee.

X. Entire Order

The provisions of this Order constitute the complete and entire Order issued to the Respondent concerning resolution of the violations identified herein. No term, condition, understanding or agreement purporting to modify or vary any term hereof shall be binding unless made in writing and subscribed by the party to be bound, pursuant to Paragraph X of this Order. No informal oral or written advice, guidance, suggestion or comment by the Department regarding any report, proposal, plan, specification, schedule, comment or statement made or submitted by Respondent shall be construed as relieving Respondent of its obligations to obtain such formal approvals as may be required by this Order.

XI. Effective Date

The effective date of this Order shall be the date it is signed by the Regional Director.

XII. Reservation of Rights

Except as specifically provided in this Order, nothing contained in this Order shall be construed as barring, diminishing, adjudicating or in any way affecting:

A. Any legal or equitable rights or claims, actions, proceedings, suits, causes of action or demands whatsoever that the State may have against Respondent for any other violations of the ECL, rules or regulations promulgated thereunder.

B. Any legal or equitable rights or claims, actions, proceedings, suits, causes of action or demands whatsoever that the State may have against anyone other than Respondent, its officers, directors, agents, servants, employees, successors and assigns;

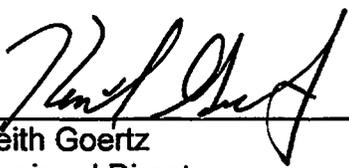
C. Whatever right the Department has to bring any action or proceeding against Respondent and/or any of Respondent's directors, officers, employees, servants, agents, successors, and assigns with respect to claims for natural resource damages; and

D. Respondent's right to assert all available defenses to any claims, actions, proceedings, suits, causes of actions or demands made or commenced by the State or the Department provided, however, that Respondent waives all legal or equitable rights claims, actions, proceedings, appeals, suits, causes of action, defenses or demands whatsoever that it may have to a judicial review of the validity and binding effect of this Order and whether or not this Order has been entered into voluntarily by Respondent.

DATED: *May 31* 2018
Rotterdam, New York

Basil Seggos
Commissioner
New York State Department of
Environmental Conservation

BY:



Keith Goertz
Regional Director
Region 4

