

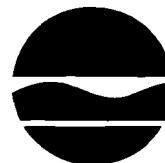
# New York State Department of Environmental Conservation

## Office of General Counsel, Region 7

615 Erie Boulevard West, Syracuse, New York 13204-2400

Phone: (315) 426-7405 • Fax: (315) 426-7408

Website: [www.dec.ny.gov](http://www.dec.ny.gov)



Joe Martens  
Commissioner

October 22, 2012

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Paul Sharlow, Esq.  
Gilberti Stinziano Heintz & Smith PC  
Attorneys and Counselors at Law  
555 East Genesee Street  
Syracuse, New York 13202-2159

**Re: DEC Case No R7-20110810-66**

Dear Mr. Sharlow:

Enclosed is a copy of the signed consent order, issued by this Department's Regional Director on October 19, 2012, together with a receipt for payment of the civil penalty provided in paragraph I of the Order.

Thank you for your cooperation in this matter.

Sincerely,

Michael E. Barnholdt  
Keyboard Specialist 1

Enclosures

Cc/w/enclosures: Thomas Vigneault, Regional Enforcement Coordinator  
Mary Jane Peachey  
Chad Donk



NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

NUMBER

573252

## RECEIPT

Region Number

7

Date

11-17-12

Location

SPRING

Division

GENERAL COUNSEL

Received of

PICKETT FULTON LLC, 77-20110810-66

In the amount of

TEN THOUSAND FIVE HUNDRED + <sup>00</sup>/<sub>100</sub> \$ 12,500<sup>00</sup>

For

VIOLATION OF ARTICLE 17 (WATER SPDES)

☐ Cash

Department Representative

MICHAEL BARNHEIM

☒ Check

Number

146505

Title

KEY-BEATS SPECIALIST I

☐ Money Order

ORIGINAL

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

-----X

In the Matter of Violations of Article 17 of the New York  
State Environmental Conservation Law and of Title 6 of the  
Official Compilation of Codes, Rules and Regulations of the State  
of New York, Parts 703 and 750, by

Riccelli Fulton, LLC  
Town of Volney  
Oswego County,

Respondent.

-----X

**CONSENT  
ORDER**

**CASE NO.  
R7-20110810-66**

**WHEREAS:**

1. The New York State Department of Environmental Conservation ("the Department" or "DEC") is an executive department of the State of New York with jurisdiction over the environmental policy and laws of this State, pursuant to, *inter alia*, the Environmental Conservation Law ("ECL") Section 3-0301.

2. In particular, DEC has jurisdiction over the administration and enforcement of ECL Article 17, Titles 7 and 8, the issuance of State Pollutant Discharge Elimination System Permits ("SPDES Permits"), and the regulations promulgated thereunder at Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York ("6 NYCRR") Part 750. DEC also has jurisdiction over the administration and enforcement of ECL Article 17, Title 5, prohibitions against pollution, and the regulations promulgated pursuant thereto at 6 NYCRR Part 703 regarding water quality standards.

3. Riccelli Fulton LLC is a domestic limited liability company with its principal executive office located at 1902 County Route 57, Volney, Oswego County, New York 13069 ("Respondent").

4. Respondent owns a parcel of real property identified by Tax Map Identification # 254.00-05-04.01 and located at 1902 County Route 57, Volney, Oswego County 13069 (the "Site").

5. At least since the Fall of 2009, Respondent stored road salt in a pile on a parking lot at the Site (the "Salt Pile"). Two (2) City of Fulton municipal drinking water supply wells, specifically the K-1 Well and the M-2A Well, are located approximately one-half (1/2) mile downgradient of the Salt Pile at the Site.

6. ECL Section 17-0501 prohibits any person from directly or indirectly discharging organic or inorganic matter into waters of the State that shall cause or contribute to a condition in contravention of the water quality standards adopted by the Department pursuant to ECL Section 17-0301 as set forth at 6 NYCRR Parts 700 through Part 706.

7. ECL Section 17-0105(2) and 6 NYCRR Section 750-1.2(97) define "waters of the State" to include lakes, bays, sounds, ponds, impounding reservoirs, springs, wells, rivers, streams, creeks, estuaries, marshes, inlets, canals, the Atlantic ocean within the territorial limits of the state of New York and all other bodies of surface or underground water, natural or artificial, inland or coastal, fresh or salt, public or private (except those private waters which do not combine or effect a junction with natural surface or underground waters), which are wholly or partially within or bordering the state or within its jurisdiction.

8. Title 6 NYCRR Section 703.5 establishes a groundwater quality standard of 250 parts per million ("ppm") for Chloride and 20 ppm for Sodium.

9. Sodium chloride from the Salt Pile at the Site leached from the Salt Pile and was discharged into the groundwater and into the City of Fulton's M-2A Well. Sample results collected from the M-2A Well beginning in December 2010 and continuing to the present show chloride concentrations in excess of the groundwater and drinking water standard of 250 ppm and sodium concentrations in excess of the groundwater standard of 20 ppm. These discharges

relating to the Salt Pile at the Site caused or contributed to and continue to cause or contribute to violations of the State's groundwater quality standards in violation of ECL Section 17-0501 and 6 NYCRR Section 703.5

10. Pursuant to ECL Section 71-1929(1), any person who violates the provisions of, or fails to perform any duty imposed by Article 17, titles I through 11, or the regulations promulgated thereunder, is subject to a civil penalty not to exceed thirty-seven thousand five hundred dollars (\$37,500.00) per day for each violation.

11. In settlement for Respondent's civil liability for the aforesaid violations, Respondent hereby affirmatively waives Respondent's right to a hearing on this matter as provided by law, consents to the issuing and entering of this Order, and agrees to be bound by the provisions, terms, and conditions contained herein.

**NOW, having considered this matter and being duly advised, IT IS ORDERED THAT:**

**I. Compliance.** Respondent shall comply with the provisions, terms, and conditions set forth in this Order. Respondent's failure to comply with any provision of this Order shall constitute a default and a violation of this Order and, upon such default and violation, the Department's right to pursue all claims and remedies administratively, at law, or in equity shall not be affected by anything contained in this Order.

**II. Civil Penalty.** Respondent is hereby assessed a Civil Penalty in the amount of Fifty Thousand Dollars (\$50,000.00). The penalty may be paid in four (4) installments of Twelve Thousand Five Hundred Dollars (\$12,500.00) each over a one-year period. The first payment of Twelve Thousand Five Hundred Dollars (\$12,500.00) is due with the return of the properly executed Order to the Department. The second payment is due four (4) months after the first payment. The third payment is due eight (8) months after the first payment. The fourth and

final payment is due twelve (12) months after the first payment. Respondent shall properly execute this Consent Order and return it along with a cashier's check, certified check, or money order made payable to the "New York State Department of Environmental Conservation" for the first penalty payment and mail both to: New York State Department of Environmental Conservation, Barbara A. McGinn, Assistant Regional Attorney, Office of General Counsel, Region 7, 615 Erie Boulevard West, Syracuse, New York 13204-2400.

**III. Schedule for Compliance.** Respondent shall perform the compliance items set forth in Appendix A of this Order, the Schedule for Compliance. Respondent shall perform these compliance items in accordance with the milestones set forth in the Schedule for Compliance which is hereby incorporated into, and made an enforceable part of, this Order. Any violation of the terms of the Schedule for Compliance shall be a violation of this Order.

**IV. Inspections and Access.** Respondent shall during regular business hours allow any duly designated employee, consultant, contractor, or agent of the Department or of any other State agency to immediately enter the Site or areas in the vicinity of the Site which may be under the control of Respondent for purposes of inspecting and to ensure Respondent's compliance with this Order, with any permit, registration, license, or certificate heretofore or hereafter issued for the Site and with applicable laws and regulations.

**V. Indemnification.** Respondent shall indemnify and hold harmless the Department, the State of New York, and any of its employees, contractors, agents or representatives for any and all claims, actions, suits, damages, and costs of every name and description, arising out of or resulting from the fulfillment or attempted fulfillment of this Order by Respondent, Respondent's directors, officers, trustees, employees, servants, agents, successors (including successors in title) and assigns. This indemnification does not extend to any claims, suits, actions, damages or costs to the extent they are attributable to grossly negligent, reckless or intentional acts of the Department, the State of New York, their employees, contractors, agents

or representatives.

**VI. Reservation of Rights.** Nothing contained in this Order shall be construed as barring, diminishing, adjudicating, or in any way affecting any of the civil, administrative, or criminal rights of the Department or of the Commissioner or his designee, with respect to the aforesaid violations or other violations by Respondent, if any, including, but not limited to, nor exemplified by, the rights to recover natural resource damages or to exercise any summary abatement powers or authorities with respect to Respondent.

**VII. Modifications.** No change in this Order shall be made or become effective except as specifically set forth by a further written order of the Department, being made upon written application to the Department by Respondent setting forth the grounds for the relief sought, or upon the Department's own findings after an opportunity for Respondent to be heard, or pursuant to the summary abatement powers of the Department.

**VIII. Regulatory Fees.** Nothing contained in this Order shall be construed as preventing the Department from collecting regulatory fees, where applicable.

**IX. Force Majeure.** Respondent shall not be subject to any penalty under the provisions of this Order if Respondent cannot comply with any of the provisions of this Order because of an Act of God, war, strike, riot, or other catastrophe which is entirely beyond Respondent's control and which Respondent's due diligence could not prevent ("force majeure"). Respondent shall notify the Department, in writing, within ten (10) days of any claimed force majeure event that may lead to delays in compliance, or the prospective inability to comply with this Order, and shall promptly request modification of this Order prior to such noncompliance. Respondent shall include in such notice the measures taken and to be taken by Respondent to prevent or minimize any delays and shall request an appropriate extension of modification of this Order. Failure to give such notice within such ten (10) day period constitutes a waiver of any claim that a delay is not subject to penalties. Respondent shall have the burden of proving that

an event is a defense to compliance with this Order.

**X. Entire Order.** This Order and the attached Schedule for Compliance, including Appendix A, constitute the entire agreement of the parties. No obligation of Respondent shall be deemed to have been waived or otherwise modified without the express written consent of the Commissioner or the Commissioner's designee.

**XI. Release.** Upon the Department's determination that Respondent has fully and timely completed the requirements of this Order on Consent, the Department shall release Respondent from any further liability, civil, criminal, and administrative, to the Department for the violations that are the subject of this Order.

Nothing in this Order on Consent shall be construed as an admission in any civil litigation, administrative proceeding, or other action involving Respondent and/or third parties. Respondent expressly reserves its rights, contractual and otherwise, to assert any claims, demands or raise any defenses that may be available to Respondent with respect to any third party not a signatory to this Order on Consent.

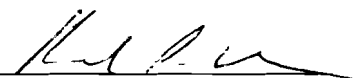
**XII. Binding Effect.** The provisions, terms, and conditions of this Order shall bind the Respondent, the agents, servants, employees, successors, and assigns of Respondent, and all persons, firms, and corporations acting under or for Respondent.

**XIII. Effective Date.** The effective date of this Order shall be the date it is signed by the Commissioner or the Commissioner's designee.



Dated: SYRACUSE, NEW YORK  
October 19, 2012

NEW YORK STATE DEPARTMENT OF  
ENVIRONMENTAL CONSERVATION  
Joe Martens, Commissioner

BY 

KENNETH P. LYNCH

Regional Director, Region 7

**CONSENT BY RESPONDENT**

Respondent hereby consents to the issuing and entering of this Order without further notice, waives the right to notice and hearing herein, and agrees to be bound by the provisions, terms, and conditions contained herein.

**Riccelli Fulton, LLC,  
Respondent,**

PRINT NAME: Richard J Riccelli  
TITLE: Member  
SIGNATURE: Richard J Riccelli  
DATE: 10/17/12

**ACKNOWLEDGMENT**

**STATE OF NEW YORK**

**COUNTY OF** Onondaga

)  
: ss.:

On the 17<sup>th</sup> day of October in the year 2012 before me,

the undersigned, a Notary Public in aforesaid State, personally appeared RICHARD J. Riccelli, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument, and he/she acknowledged to me that he/she executed the same in his/her capacity, and that by his/her signature on the instrument, the corporation upon behalf of which the individual acted, executed the instrument.

Frederick J. Micale  
NOTARY PUBLIC

FREDERICK J. MICALE  
Notary Public in the State of New York  
Qualified in Onondaga County No. 6070642  
My Commission Expires March 4, 20 14

## APPENDIX A

### SCHEDULE FOR COMPLIANCE

1. Within seven (7) days of the Effective Date of this Order, Respondent shall provide a copy of said Order to the Army Corps of Engineers and Respondent shall diligently pursue all the necessary permits and approvals in place allowing the discharge of the City of Fulton's M-2A Well to the Oswego River in accordance with the SPDES application received by the Department on December 8, 2011 from Spectra, with the exception that the maximum pumping rate for the M-2A Well shall be 150 gpm. The pumping rate shall not be lower than 60 gpm unless prior written authorization from the DEC has been obtained. Discharge from the City of Fulton's M-2A Well shall be analyzed for flow, chlorides, sodium, total dissolved solids, and turbidity on a biweekly basis, i.e., once every two (2) weeks. Volatile organic compounds shall be analyzed monthly. If concentrations in this discharge exceed 2000 ppm of total dissolved solids, 2000 ppm of chloride, or 20 ppb of total volatile organic compounds, Respondent shall notify the DEC verbally within twenty-four (24) hours of receiving such analytical results and provide written confirmation within forty-eight (48) hours of receiving such analytical results. Should these concentrations be detected in the discharge, the DEC reserves the right to require Respondent to sample in the Oswego River at both upstream and downstream locations. Pursuant to an agreement between Respondent and the City of Fulton, Respondent shall reimburse the City of Fulton for the City of Fulton's expenses for pumping the M-2A Well to the Oswego River until the City of Fulton, the DOH, and the DEC determine that pumping is no longer necessary. Authorization to stop pumping shall be in writing from the DEC.
2. Unless Respondent can demonstrate to the DEC and to the DOH that the installation of a new recovery well is not required and Respondent receives written notice from the DEC and the DOH that the installation of the new recovery well is not required, Respondent shall install and operate a new recovery well near the Miller Monitoring Well # 23 for the purpose of pumping the aquifer to protect the City of Fulton's K-1 Well as follows: DEC and/or the City of Fulton will give written notice to Respondent of at least forty-five (45) days but no more than sixty (60) days that the repaired K-1 Well will be operational; at least thirty (30) days after Respondent receives said notice, Respondent shall have completed the installation of the new recovery well and seven (7) days thereafter shall begin pumping and discharging this new recovery well to the Oswego River in accordance with the December 8, 2011 SPDES application from Spectra with the exception that the maximum pumping rate shall be 35 gpm and it shall be located at least 200 feet from any municipal supply well. The pumping rate shall not be lower than 15 gpm unless prior written authorization has been obtained from the DEC. Pumping and discharging from this new recovery well shall continue until written authorization to stop is obtained from the DEC. It is estimated that a pumping rate between 15-35 gpm will result in a 1 to 2 foot drawdown. Discharge shall continue until written authorization to stop discharging is obtained from the DEC. With permission from the City of Fulton,

Respondent shall also install transmission line(s) connecting the discharge from this new recovery well to the Oswego River in the vicinity of the City of Fulton's M-2A Well discharge point. Respondent shall monitor the K-1 Well and the new recovery well for turbidity on a weekly basis. The new recovery well shall also be analyzed for flow, chloride, sodium, and total dissolved solids on a biweekly basis. Volatile organic compounds shall be analyzed on a monthly basis. If concentrations in this discharge exceed 2000 ppm of total dissolved solids, 2000 ppm chloride, or 20 ppb of total volatile organic compounds, Respondent shall notify the DEC verbally within twenty-four (24) hours of receiving such analytical results and provide written confirmation within forty-eight (48) hours of receiving such analytical results. Respondent shall operate the new recovery well until the City of Fulton, the DOH, and the DEC determine that operation of the new recovery well is no longer necessary. Authorization to stop using the new recovery well shall be in writing from the DEC. Notwithstanding the above, failure by the DEC and/or the City of Fulton to give notice within the "forty-five (45) days but no more than sixty (60) days" timeframe shall not relieve Respondent of the obligation to install and operate a new recovery well to protect the K-1 Well.

3. Within fourteen (14) days of the Effective Date of this Order, Respondent shall submit to the DEC an investigative work plan that commits to defining the nature and extent of sodium and chloride contamination relating to the former Salt Pile on the Site including the large natural pond (the "Investigative Work Plan"). Respondent can provide data and other information regarding other possible sources of contamination to the Department for review. The Department will consider and evaluate all data provided to the Department in determining what, if any, sources other than Respondent's Salt Pile contributed to the groundwater violations, sediment contamination, and soil contamination that are the subject of this Order. The Department will take such data and information into account when selecting investigations and remedial actions.

This Investigative Work Plan shall commit to:

- A. Sampling the Miller Monitoring Wells 23S, 23D, 24S, 24D, 26S, 26D, 28S, 28D, 46S, 46D, 49S, 49D, 57D, 60S, and 60D for sodium and chloride on a monthly basis until and unless Respondent can demonstrate to the DEC and the DOH that sampling is not required and Respondent receives written notice from the DEC and the DOH that sampling is no longer required;
- B. In addition to the sampling requirements outlined above, sampling the City of Fulton's K-1 Well and the combined water at the water works entry point for sodium and chloride on a biweekly basis. Sampling shall continue until the DEC provides written notice that it is no longer necessary;
- C. The discharge of the natural pond is authorized once the nature and extent of contamination relating to the former Salt Pile as determined by DEC has been identified in soil, sediment, and water in and near the natural pond. The DEC will provide Respondent with written authorization allowing discharge from the natural

pond. Discharge shall be limited to twenty-one (21) days in duration unless written authorization to do otherwise has been obtained from the DEC, and there shall be no turbidity increase in the discharge that causes a substantial visible contrast to natural conditions. Discharge shall be consistent with the December 8, 2011 SPDES application from Spectra and shall be analyzed for flow, chlorides, sodium, total dissolved solids and turbidity on a weekly basis. If concentrations in this discharge exceed 2000 ppm of total dissolved solids, 2000 ppm chloride, or 20 ppb of total volatile organic compounds, Respondent shall notify the DEC verbally within twenty-four (24) hours of receiving such analytical results and provide written confirmation with forty-eight (48) hours of receiving such analytical results. Should these concentrations be detected in the discharge, the DEC reserves the right to require Respondent to sample in the Oswego River at both upstream and downstream locations;

- D. Should chloride, total dissolved solids or total volatile organic compounds concentrations in any discharge reach 2000 ppm, 2000 ppm or 20 ppb, respectively, the DEC reserves the right to require Respondent to sample in the Oswego River to determine what, if any, impact these discharges may be having on the Oswego River. The DEC will select the appropriate sampling locations;
- E. A remedial objective of achieving groundwater standards. Respondent shall also commit to identifying and addressing all sources of groundwater contamination related to the former Salt Pile located at the Site as determined by DEC. DEC will consider background concentrations, pre-existing data, and other source areas as supported by data and science. Actions to fulfill this commitment include, but are not limited to, removing salt-contaminated soil and sediment causing or contributing to the groundwater violations resulting from the former Salt Pile as determined by the DEC. The Investigative Work Plan shall depict additional soil and sediment sampling locations on a map as well as include all past soil and sediment data. The Investigative Work Plan shall also depict all known areas of past excavation and include existing sodium and chloride concentrations in soil and groundwater as well as all locations with known chloride concentrations over 1000 ppm and sodium over 100 ppm. Sampling shall be done at the surface and at as many depths as needed to define source areas and excavation areas. The natural pond sediment as well as the soil/sediment under and adjacent to the former salt storage pad shall be sampled on a 100-foot grid spacing and at as many depths as needed to define source areas related to the former Salt Pile as determined by the DEC and areas correspondingly in need of excavation. Soil around the natural pond and in and near areas of stressed vegetation shall also be sampled vertically and horizontally to determine source areas related to the former Salt Pile as determined by the DEC. Areas near the 3 retention ponds shall be sampled to further define potential source areas related to the former Salt Pile as determined by the DEC. All sampling shall be completed within thirty (30) days of the Effective Date of this Order;

- F. Performing additional sampling if new data do not sufficiently define source areas related to the former Salt Pile as determined by the DEC; and
  - G. Compliance with storm water requirements.
4. By March 1, 2013, providing a remedial work plan to the DEC that addresses all source areas from the Salt Pile as determined by the DEC (the "Remedial Work Plan"). Proposed remedial actions shall consider known volatile organic compound contamination (e.g., use of screening techniques during excavation or groundwater treatment applicability). These actions can include groundwater treatment and soil excavation to the extent necessary to address contamination relating to the former Salt Pile as determined by the DEC. The Remedial Work Plan shall depict all known areas of past excavation and propose additional locations for soil and sediment excavation and source removal areas unless Respondent has demonstrated to the satisfaction of the DEC that these source areas and contamination are not related to the former Salt Pile. Groundwater treatment shall also be discussed. Existing groundwater, soil and sediment concentrations shall be included on a map with proposed remedial actions. Excavation of known areas with elevated sodium and chloride concentrations relating to the former Salt Pile as determined by the DEC will be completed by May 1, 2013. Additional sampling may result in additional excavation. The Remedial Work Plan Report shall state that achieving groundwater standards is the cleanup objective. DEC will consider all data, background conditions, and other information when evaluating appropriate remedial measures. If the objective of achieving groundwater standards has not been met by August 1, 2013, Respondent will propose additional remedial measures, including an evaluation of groundwater treatment, that will bring the Site into compliance with the ECL addressing all contamination from the former Salt Pile. This proposal will be provided to the DEC, the City of Fulton, the DOH, and the Oswego County Health Department by September 1, 2013.
5. Within sixty (60) days of the Effective Date of this Order, Respondent shall install a new public water supply well at a location and design acceptable to the City of Fulton.
6. All soil and materials excavated as a result of any activity at the Site shall not be stored on the Site to further protect the City of Fulton's municipal well field unless Respondent has received prior written authorization from the DEC. Within thirty (30) days from being generated, any materials or wastes generated as a result of actions required by this Order shall be removed for off-site disposal unless authorized by the DEC. Storage of soil, sediment, and waste on-site shall be managed in such a manner so as to not allow any releases to the environment. This is especially critical in areas of known contamination.
7. Data for the City of Fulton's K-1 Well, the City of Fulton's M-2A Well, the combined water at the water works entry point, and the new recovery well shall be provided to the

City of Fulton, the Oswego County Health Department, the DOH and the DEC within one (1) week of Respondent's receipt of the sampling results. Laboratory data sheets and maps depicting the sampling locations, concentrations detected, dates and historical data shall also be provided to the City of Fulton, the Oswego County Health Department, the DOH, and the DEC.

8. By the 10<sup>th</sup> day of each month throughout the entire term of this Order, Respondent shall submit monthly reports to the City of Fulton, the Oswego County Health Department, the DOH, and the DEC. The monthly reports shall discuss all activities required by this Order and the status of each task. Specifically, the monthly reports shall include all sampling results since the last report (including the lab data sheets), shall depict all sampling results on maps along with historical data, shall include a compilation of data showing the most recent data and historical data, shall provide pumping rates and volumes discharged and collected, shall provide the quantity and dates of waste generation, waste storage and disposal locations, shall specify any violations of the discharge authorizations, and shall discuss any problem(s) encountered during the last month as well as activities planned for correcting any problem(s). All remedial measures implemented shall be presented in detail and on engineered drawings and accompanied by data and description demonstrating its effectiveness to address contamination generated by the Salt Pile as determined by the DEC. Transportation and off- site disposal and on-site storage shall be presented in the monthly report and shall be in compliance with the ECL and this Order. The monthly report shall also discuss all activities planned for the next reporting period. It shall also provide an assessment of activities and their effectiveness toward compliance with groundwater standards. There shall also be a set of recommendations and estimated timeframes to achieve groundwater standards as well as the need to continue pumping the City of Fulton's M-2A Well and the new recovery well. Timeframes for compliance with this Order and groundwater standards shall also be included.
9. All submittals required under this Schedule for Compliance are subject to the review and acceptance by the DEC after due consideration by the City of Fulton, the Oswego County Health Department, and the DOH.
10. All changes to this Order, including but not limited to sampling requirements and modifications to approvals, shall be in writing from the DEC.
11. Copies of all correspondence/reports/notices/submittals to the Department required under this Order on Consent and this Appendix A shall be provided to:

For the New York State  
Department of Environmental  
Conservation:

Mary Jane Peachey, P.E.  
Regional Engineer  
New York State Department of Environmental  
Conservation, Region 7

615 Erie Boulevard West  
Syracuse, New York 13204-2400

For the City of Fulton:

The Honorable Ronald Woodward  
Mayor, City of Fulton  
141 S. First Street  
Fulton, New York 13069-1765

For the Oswego County  
Health Department:

William Havener  
Public Health Engineer  
70 Bunner Steet  
Oswego, New York 13126

For the New York State  
Department of Health:

John Strepelis, P.E., M.E.  
NYS Department of Health  
Acting Regional Environmental Health Program  
Director  
217 S. Salina Street  
Syracuse, New York 13202