

New York State Department of Environmental Conservation

Office of General Counsel, Region 4

1130 North Westcott Road, Schenectady, New York 12306-2014

Phone: (518) 357-2048 • Fax: (518) 357-2087

Website: www.dec.ny.gov



Joe Martens
Commissioner

By E-mail and Regular Mail

May 15, 2014

John Polster, Esq.
Corporation Counsel
City Schenectady
City Hall
105 Jay Street
Schenectady, NY 12305
JPolster@Schenectadyny.gov

Re: Order on Consent
R4-2012-1218-117

Dear Mr. Polster:

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

Sincerely,



Richard Ostrov
Regional Attorney
Region 4

Enclosure

cc: M. Klotz
J. DiMura
E. McTiernan
S. Crisafulli
A. Dzierwa
J. Malcolm

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

In the Matter of Violations
of the Environmental Conservation
Law (“ECL”) Article 17 and
Title 6 of the Official Compilation
of Codes, Rules and Regulations of the
State of New York (6 NYCRR)

**ORDER ON CONSENT
 (“ORDER”)**

- by -

File No. R4-2012-1218-117

City of Schenectady
Respondent

WHEREAS:

JURISDICTION

1. The Department of Environmental Conservation (“Department”) is the State agency which has jurisdiction over the environmental law and policy of the State pursuant to, *inter alia*, Section 3-0301 of the Environmental Conservation Law. In particular, DEC is and has been responsible for the protection of the water resources of the State, pursuant to ECL Article 17 and the rules and 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, *et seq.*

EXISTING SPDES PERMIT

2. Respondent, City of Schenectady, is a municipality of the State of New York that operates a waste water treatment plant located at 300 Anthony Street, Schenectady, New York (WWTP) that discharges through Outfall No. 001 to the Mohawk River, a Class A water body. The WWTP is regulated by a State Pollutant Discharge Elimination System permit, NY0020516 (“existing permit”).

3. The existing permit identifies two combined sewer outfalls (“CSOs”). Outfall No. 003 (“Alco Regulator”) discharges to the Mohawk River at Latitude (42/49/32) and Longitude (73/56/11). CSO Outfall No. 006 (Washington Avenue) was permanently sealed in 2008 and no longer discharges to the Mohawk River.

4. The permit contains Best Management Practices for CSOs, special conditions for a Long Term Control Plan, and Post Construction Compliance Monitoring Plan to reduce the volume of untreated CSO discharges. These permit requirements are typically included for CSO SPDES permits and required under the United States Environmental Protection Agency (“EPA”) CSO Control Policy.

PREVIOUS ORDERS ON CONSENT

5. Respondent is subject to Order on Consent R4-2005-0525-52 (June 25, 2005) (“June 25, 2005 Order”) and Modification of Order on Consent R4-2005-0525-52 M1 (September 28, 2005) (“Modification”) that addressed inflow and infiltration (“I& I”) issues and SPDES permit limit violations.

6. On June 30, 2005, Respondent submitted a report titled *Sewer System Evaluation Report* to the Department as required pursuant to Paragraph 1 of the June 25, 2005 Order on Consent Schedule of Compliance. In January, 2007, Respondent submitted an Infiltration and Inflow Study as required pursuant to Paragraph 4 of the Modification’s Schedule of Compliance. This information was reviewed as part of permit renewal application received in September 2012 and the Department determined that the Respondent’s WWTP collection system would henceforth be considered a separate sanitary sewer system and Outfall 003, a sanitary sewer overflow (SSO), due to the Respondent’s improvements to the system.

OBJECTIVES AND FINDINGS OF ORDER

7. The existing SPDES permit identifies Outfall 003 as a combined sewer outfall (“CSO”). CSOs are permitted outfalls during wet weather conditions. The recent Department determination that Respondent no longer operates a combined sewer system, and that Outfall 003 is actually a SSO, requires that Respondent terminate the SSO discharge with regard to Outfall 003. Therefore, the objective of this Order is to eliminate the SSO from Outfall 003.

In addition to the permit modification, this transition will be accomplished through a process that first requires Respondent to investigate the feasibility of eliminating its sanitary sewer flows to Outfall 003 within a three year period from the effective date of this Order. Respondent has provided the Department with preliminary information that suggests that SSOs are occurring during wet weather events when the elevation of the Mohawk River exceeds approximately 212 feet above sea level. Respondent will undertake an immediate investigation to determine the causal connection between the frequency and duration of the SSOs at Outfall 003, susceptibility of the collection system to inflow and infiltration within the defined FEMA floodplain boundaries, and the associated impacts from high water elevations of the Mohawk River.

The Respondent, based on the investigation and findings, will submit to the Department an approvable report determining whether there is a short term feasible remedy to eliminate the wet weather SSOs from Outfall 003. A short term feasible remedy is defined as an action or actions that can be implemented and completed within three years of the effective date of this Order. Based on the Department’s review and approval of the short term remedy investigation report, Respondent will submit to the Department either : (1) an approvable plan for implementing the short term feasible remedy ; or (2) begin the long term remedy investigation leading to a long term remedy to eliminate the SSOs in accordance with the Schedule of Compliance.

The Order's Schedule of Compliance is intended to be a bridge from noncompliance to compliance, as expeditiously as possible. Schedules of Compliance require interim measures to mitigate the occurrences and duration of violations until final compliance is achieved. Interim measures are meant to protect water quality as much as possible during the implementation of the compliance schedule.

The Department's Civil Penalty Policy seeks to achieve a consistent approach to the assessment of civil penalties but recognizes that "each region of the State, and indeed each individual case, varies from every other." Penalties are assessed when a person or in this case, a municipality, is in violation of a statutory or regulatory provision such as a SPDES permit. The violator should be deterred from further violations and not benefit from its noncompliance.

The Department has determined that the Respondent's existing financial distress supports no assessment of a civil penalty in this case. The Department is relying on the findings of the New York State Comptroller's November 2012 audit report in making this determination. The audit found that the City of Schenectady is in fiscal distress and ended the 2011 fiscal year with an operating deficit of \$4.8 million and an unassigned fund balance deficit of \$1.9 million. The report also noted that Moody's bond rating service has lowered the Respondent's bond rating from A-1 to A-3 because of the City's "declining financial position, delinquent real estate taxes, rising employee benefit expenditures, above average debt burden and below-average socio-economic indicators."

LEGAL STATUS OF SANITARY SEWER OVERFLOWS

8. Respondent's existing permit identifies CSO Outfall Nos. 003 (Alco Regulator) and 006 (Washington Avenue).

9. Respondent's WWTP received 4.67 billion gallons of sanitary flow in 2013 and the Alco regulator averaged a release of approximately 53 million gallons per year of sanitary overflow during the past four years including wet weather events associated with Hurricane Irene and Tropical Storm Lee. The four year annual average without including Hurricane Irene and Tropical Storm Lee is approximately 31 million gallons. The WWTP therefore treated approximately 98.9% of the flows in the collection system including consideration of Hurricane Irene and Tropical Storm Lee events and approximately 99.9% of the flows excluding consideration of the Hurricane Irene and Tropical Storm Lee events.

10. A SSO is prohibited by the Clean Water Act. ECL § 17-0807(4): "any discharge not permitted by the provisions of this article, rules and regulations adopted or applicable pursuant hereto, the Clean Water Act, or provisions of a permit issued hereunder."

11. ECL §17-0509 requires Respondent to provide effective secondary treatment as a minimum degree of treatment prior to the discharge of sanitary sewage into the surface waters of the state. There is no secondary treatment associated with Outfall No. 003

12. Respondent's periodic discharges of untreated sewage from Outfall No. 003 to the Mohawk River are SSOs.

MODIFICATION OF EXISTING PERMIT

13. The Department and Respondent agree that the existing permit will need to be modified to terminate the SSO discharge from Outfall 003. The Department will provide a draft permit to the Respondent and the permit modification review will follow the procedural and substantive requirements of applicable state and federal regulations.

WAIVER OF HEARING

14. Respondent has affirmatively waived its right to a hearing as provided by law and has consented to the issuing of this Order and has agreed to be bound by the provisions, terms and conditions of this Order.

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

STIPULATED PENALTIES

I. A. In the event that Respondent fails to meet the deadlines in the Schedule of Compliance, Respondent shall, within thirty days following receipt of a written notice of a demand for payment from the Department, pay to the Department a stipulated penalty as follows:

<u>Days Overdue</u>	<u>Penalty Amount Per Day Overdue</u>
1 – 30	\$500
31-40	\$1000
41-50	\$1500
51-60	\$2000
more than 60	\$2500

B. The stipulated penalties may be forgiven in whole or in part at the discretion of the Department based on Respondent's totality of efforts in maintaining and achieving compliance with all the requirements in the Order.

C. The Department shall not be precluded from taking any action authorized by law, and the Department may seek sanctions provided in the ECL, in addition to assessing stipulated penalties as set forth in this Order. Should the Department seek penalties and/or sanctions beyond those stipulated in this Order, the Respondent shall be provided all rights mandated by applicable law and regulation.

FORCE MAJEURE

II. Respondent shall not suffer any penalty or be subject to any proceeding or action in the event it cannot comply with any requirement of this Order as a result of any Force Majeure Event, which events include, acts of nature, fires, explosions, epidemics, riots, war, rebellion, sabotage, delay in receiving permits or approvals from the Department or any other governmental agency after submitting a timely and complete application, the revocation of any such permits or approvals, or any other condition that was not caused by the negligence or willful misconduct of Respondent and that could not have been avoided by Respondent through the exercise of due care.

SCHEDULE OF COMPLIANCE

III. Respondent shall comply with the Schedule of Compliance and any milestone date and requirement in the Schedule of Compliance. 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.

CONTACTS AND SUBMISSIONS

IV. All submittals and contracts required herein shall be made to the Region 4 office of DEC, 1130 North Westcott Road, Schenectady, NY 12306, Attn: Regional Water Engineer. The Department will contact and send correspondence regarding this Order to: Mayor, City of Schenectady, City Hall, Jay Street, Schenectady, New York 12305. Within 30 days of the effective date of this Order, Respondent shall designate a city employee or consultant who shall be the project manager and provide that information to the Respondent.

ACCESS

V. Respondent shall allow duly authorized agents and employees of DEC access to any facility, site, or records owned, operated, controlled, or maintained by Respondent, without prior notice, at such times as may be desirable or necessary, and/or perform such tests as the Department may deem appropriate, to copy such records, or to perform any other lawful duty or responsibility.

INDEMNIFICATION

VI. Respondent shall indemnify and hold harmless the Department, the State of New York, and their representatives and employees, for all claims, suits, actions, damages and costs of every name and description arising out of or resulting from the fulfillment or attempted fulfillment of this Order by Respondent, its employees, servants, agents, successors or assigns.

SUCCESSORS AND ASSIGNS

VII. The provisions of this Order shall be deemed to bind Respondent, its agents employees, successors, and assigns, and all persons, firms, and corporations acting under or for Respondent.

EFFECTIVE DATE

VIII. The effective date of this Order shall be the date that the Commissioner or his designee signs it. The Department will provide Respondent (or the Respondent's Counsel) with a fully executed copy of this Order as soon as practicable after the Commissioner or his designee signs it.

MODIFICATION

IX. This Order is the entire agreement of the parties, and no provision of the Order shall be deemed waived or otherwise modified except as is specifically set forth in a writing executed by the Commissioner or Regional Director of DEC indicating intent to modify this Order.

SUPERCEDEENCE OF PREVIOUS ORDERS

X The terms, conditions and provisions of this Order and its Schedule of Compliance supersedes the terms, conditions and provisions and the Schedules of Compliance of the previous June 25, 2005 Order and its Modification.

OTHER RIGHTS

XI. Nothing contained in this Order shall be construed as barring, diminishing, adjudicating or in any way affecting (1) any legal, administrative or equitable rights or claims, actions, suits, causes of action, or demands whatsoever that the Department may have against anyone other than Respondent; (2) any right of the Department to enforce administratively or at law or in equity, the terms, provisions and conditions of this Order ; (3) any right of the Department to bring any future action, either administrative or judicial, for any other violations of the ECL, the rules and regulations promulgated there under, or conditions contained in orders or permits, if any, issued by the Department to Respondent; (4) the summary abatement powers of the Department, either at common law or as granted pursuant to statute or regulation; and (5) natural resources damages. The Respondent doesn't waive its right to contest such actions above except as specifically waived in this Order by Respondent and except to the extent that Respondent's defense is based on the failure of the Respondent to fund the Schedule of Compliance requirements or Respondent's officials, employees or contractors failure to perform a requirement of this Order.

FULL SETTLEMENT

XII. This Order settles the civil and administrative violations identified herein.

QUARTERLY REPORTS AND MEETINGS

XIII. By the 15th day of the month following each calendar year quarter, Respondent shall submit a report to the Department certifying its compliance with the requirements of the Schedule of Compliance. The quarterly report shall also include information on the following actions by the Respondent: response and reports on SSOs, revisions to the Asset Management Plan, notifications of SSOs, and requests for sewer extensions and connections.

Respondent's consultant and/or technical staff shall meet with Department staff on the second Wednesday at 10 A.M. following each calendar year quarter at the Department's Region 4 Office unless another date and/or time and/or place has been agreed upon by the parties.

XIV. SUBMITTED DOCUMENT PURSUANT TO ORDER

1. All documents submitted pursuant to this Order are subject to Department review approval except for quarterly reports. The Department shall review each of the submittals 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. If the Department approves a submittal it shall be incorporated as an enforceable part of this order including the compliance schedules associated with the corrective actions specified in the submittal.

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.

c. Respondent shall modify 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.

TERMINATION OF ORDER

XV. This Order shall be deemed completely satisfied and shall terminate upon Respondent's written certification, and DEC's written verification, of timely completion of all the requirements in the Schedule of Compliance.

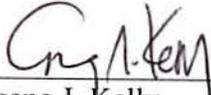
THIRD PARTIES

XVI. This Order is made strictly for the purposes of the Department, the State of New York and the United States Environmental Protection Agency and is not intended for use by any third party.

DATED: 5/15, 2014
Rotterdam, New York

Joseph Martens
Commissioner
New York State Department of
Environmental Conservation

BY:



Eugene J. Kelly
Regional Director
Region 4

CONSENT BY RESPONDENT
City of Schenectady

Respondent hereby consents to the issuing and entering of this Order, waives its right to a hearing herein, and agrees to be bound by the provisions, terms and conditions contained herein.

BY: Gary M. McCarthy TITLE: Mayor

DATE: 5/14/2014

STATE OF NEW YORK)
)ss.:
COUNTY OF)

On the 14th day of May in the year 2014 before me, the undersigned, a Notary Public in and for the State, personally appeared, 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 acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

[Signature]
Notary Public
Qualified in the County of:
My Commission Expires:

APRIL G. VALENTINO
Commissioner of Deeds
Qualified in Schenectady County
Commission Expires July 1, 20 14

APPROVED FOR SIGNATURE
[Signature]
SCHENECTADY CORPORATION COUNSEL

SCHEDULE OF COMPLIANCE

Measuring Sanitary Sewer Water Contributions from Outfall 003 During SSOs

1. Within 30 days of the effective date of the Order, Respondent shall submit to the Department an approvable methodology for calculating and estimating the flow of each sanitary sewer overflow event from the Alco Regulator to Outfall 003 and the SSO data shall be submitted in the Quarterly Reports. Respondent shall also comply with all other applicable federal and state notification and reporting requirements in 6 NYCRR Part 750 et seq, the permit, and the Sewage Pollution Right to Know Law and regulations promulgated there under.

Investigation to Eliminate SSO Discharges

2. Upon the effective date of this Order, Respondent shall commence an investigation, prepared by a Professional Engineer licensed in and by the State of New York (“Professional Engineer”) to: (1) identify potential sources of infiltration and inflow to the collection system tributary to the Alco regulator and Outfall 003 focusing the investigation on system components identified within the defined FEMA floodplain boundaries; and (2) evaluate the impacts, if any, of Mohawk River water levels on the frequency and duration of SSOs and manhole discharges along Front Street. The investigation shall be consistent with the Department’s Division of Water Guidelines for Sanitary Sewer Overflows Abatement Analysis dated April 24, 2009.

3. Within 120 days of the effective date of this Order, Respondent shall provide temporary chlorination, at approximately 10 gallons of sodium hypochlorite per million gallons of sewage discharged, at the ALCO regulator for the duration of each SSO.

4. Within 365 days of the effective date of this Order, Respondent shall complete the investigation conducted pursuant to Paragraph 2 and submit to the Department an approvable investigation report prepared by the Professional Engineer providing either a: (1) Sanitary Sewer Overflow Mitigation Plan which identifies the short term feasible remedy to eliminate the wet weather SSOs from Outfall 003 and includes an implementation schedule with interim milestone dates for the short term feasible remedy and physical elimination of the SSO; or (2) notice with supporting technical and cost information that there is no short term feasible remedy. A short term feasible remedy shall have the meaning as defined in Paragraph 7 of the Order.

Long Term Study and Plan to Eliminate SSOs

5. If pursuant to Paragraph 4 of the Schedule of Compliance there is no approvable short term feasible remedy, Respondent shall have:

a. 120 days from the date of approval of the Report submitted pursuant to Paragraph 4 of the Schedule of Compliance to submit to the Department an approvable Professional Engineer’s report that assesses and evaluates whether there are interim feasible methods for floatables removal and/or retention of sanitary sewer flows prior to its discharge from Outfall 003. The feasibility study shall evaluate the potential to reasonably mitigate or lessen the effects of the SSO discharge on the best usages of the Mohawk River at a minimum during the bathing season. The report shall also include an expeditious schedule with interim milestone dates for implementing any feasible measures identified in the report.

b. 365 days from the date of approval of the Report submitted pursuant to Paragraph

4 of the Schedule of Compliance to submit to the Department an approvable long term Sanitary Sewer Overflow Mitigation Plan and a schedule with annual milestone dates prepared by a Professional Engineer with a date of completion of no later than December 31, 2023. The plan shall be considered completed when the SSOs permanently cease and shall include provisions to physically eliminate the SSO.

Asset Management Plan

6. Respondent shall submit an approvable Assessment Management Plan (“AMP”) for the wastewater collection system to the Department within 12 months of the Department’s approval of either a short term feasible remedy pursuant to Report submitted pursuant to Paragraph 4 of the Compliance Schedule or a long term Sanitary Sewer Overflow Mitigation Plan submitted pursuant to Paragraph 5 of the Compliance Schedule. The AMP shall be developed in accordance with the U.S. EPA’s April 2008 “Asset Management: A Best Practices Guide”. Respondent shall update the AMP as necessary and submit changes to the Department for review and approval as needed. The AMP will include the following information and any other information or measures inherent in the AMP development and implementation process:

- A. An inventory of assets (including both equipment and personnel);
- B. An assessment of criticality and condition and lifespan of equipment under the full range of flows experienced in the collection system;
- C. A ranking and prioritization of asset maintenance and improvements based on the subparagraph B assessment and the schedule in the Plan; and
- D. An itemized capital budget plan for funding and maintaining continuous compliance with its permit and regulations in 6 NYCRR Part 750 et seq. The approved AMP will be an enforceable part of this Order. The AMP shall be incorporated into Respondent’s permit. Upon incorporation into Respondent’s permit, the AMP provision shall cease to be enforceable under this Order.

Sewer Extension and Connections to Collection System Serving Outfall 003

7. The Respondent has documented the removal of inflow and infiltration (I&I) and collection system improvements associated with Outfall No. 003 (Alco Regulator) since January 1, 2008. Based upon documentation submitted by the Respondent to the Department, improvements completed since January 1, 2008 reduce peak wet weather flows or increase system conveyance by 3.5 mgd (includes adjustment based on 4:1 offset requirements), which could allow the Respondent to add some new sewer connections without the expectation of increasing the SSO discharges. Because some new economic development projects have already been planned, the Respondent may make the following connections to the sewer district, subject to any necessary sewer extension approval by the Department, without the need for any offsets:

1. General Electric Energy Storage (GE Power and Water)
2. Alco Brownfield Development Projects
3. Town of Glenville - Additional flows or new connections subject to the 2 million gallon per day allowable flow limit contract between the Respondent and the Town.

4. The Robinson Block Project (commercial & residential development on Erie Boulevard, South Ferry Street, and State Street)
5. Projects designated under the START-UP NY Program that fall within a mile radius of Schenectady County Community College

Any new connection to the collection system or change in use of an existing connection that is located either upstream or downstream of the Alco Regulator and is tributary to the 42 inch Front Street interceptor or the 3 ft. 7 inch by 6 ft. (4 x 6) main interceptor and is greater than 2,500 gallons per day (“gpd”) will require that a 4:1 offset* be provided; credits can be created by new projects to achieve the required offset value. Such requests must be accompanied by appropriate documentation and prepared/certified by a Professional Engineer licensed to practice in New York State. Respondent must also comply with the requirements specified in 6 NYCRR Part 750-2.10 (Special Provisions - New or Modified Disposal Systems or Service Areas) with regards to the submittal of an engineering report/plans and sewer extension requests and subsequent review/approval by the Department.

* Mitigation projects that qualify for the offset include infiltration and inflow reduction, collection system improvements, and green infrastructure projects. Respondent may submit to the Department for review and approval a report prepared by a New York State Licensed Professional Engineer demonstrating that connections downstream of the Alco Regulator will not cause or contribute to an SSO or increase its flow or duration. The report shall include a hydraulic analysis using real time and/or historic data. If the report is approved by the Department, the Respondent will be exempt from the 4:1 offset for downstream connections to the 4 x 6 main interceptor.

Notification of SSOs

8. Respondent shall provide notification within two hours to the Department, health department, contiguous municipalities and downstream Mohawk River water supply districts of the commencement and conclusion of a SSO from Outfall No. 003. The window for notification shall begin when Respondent opens the Alco regulator. The SSO episode shall conclude when the Alco Regulator is closed. The information shall be included in the Quarterly Reports. This notification provision does not affect Respondent’s other statutory and regulatory notice and reporting requirements including but not limited to the Sewage Pollution Right to Know Act.

Modification of SPDES Permit

9. The Respondent agrees to SPDES permit modifications to remove the identification of Outfall 003 as an CSO and the Long Term Control Plan requirements. Respondent agrees to waive any of its rights to request a hearing pursuant to 6 NYCRR 621 to challenge these modifications.



**CITY COUNCIL
SCHENECTADY, NEW YORK**

RESOLUTION NO.2014-114

Councilmember Mr. Riggi

offered the following:

**A Resolution Authorizing the City to Enter in to a Consent Order with the NYS
Department of Environmental Conservation**

WHEREAS, the New York State Department of Environmental Conservation (DEC) and City of Schenectady ("City"), have been negotiating a consent order being requested by the DEC; and

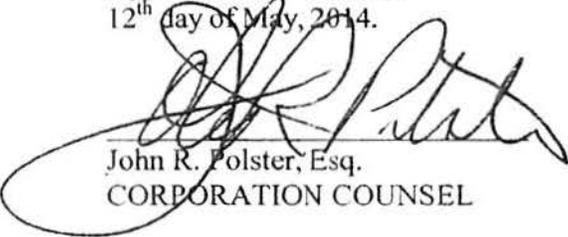
WHEREAS, the DEC is requesting the consent order to address some outstanding issues existing within the City's sanitary sewer collection system; and

WHEREAS, the parties have cooperated and participated in extensive reviews and negotiations:

NOW, THEREFORE BE IT,

RESOLVED, that the Mayor is hereby authorized to participate to execute an "Order on Consent" in substantial compliance with the draft appended hereto, subject to the approval of the Corporation Counsel.

Approved as to form this
12th day of May, 2014.


John R. Polster, Esq.
CORPORATION COUNSEL

RESOLUTION adopted unanimously
MAY 14 2014 by Councilmembers
Approved by Mayor MAY 14 2014
Requested by Mayor