



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

ANDREW M. CUOMO  
Attorney General

DIVISION OF PUBLIC ADVOCACY  
Environmental Protection Bureau

February 8, 2007

**Via Certified United States Mail**

ExxonMobil Corporation  
Corporate Headquarters  
5959 Las Colinas Boulevard  
Irving, Texas 75039-2298

ExxonMobil Corporation  
Corporation Service Company  
Registered Agent in New York State  
80 State Street  
Albany, New York 12207

Steve P. Trifiletti  
ExxonMobil Refining & Supply Company  
Global Remediation  
Inwood Terminal  
464 Doughty Boulevard  
Inwood, New York 11096

RE: Notice of Intent to Sue ExxonMobil Corporation and ExxonMobil Refining & Supply Company for Clean Water Act Violations in Greenpoint, Brooklyn, New York

Dear Sirs and Madams:

The State of New York (State) hereby gives notice of its intent to sue ExxonMobil Corporation and its affiliate, ExxonMobil Refining & Supply Company (together "Exxon"), under 33 U.S.C. § 1365 for ongoing violations of the Federal Water Pollution Control Act, more commonly known as the Clean Water Act (CWA), 33 U.S.C. §§ 1251, *et seq.* Specifically, the State will seek civil penalties and injunctive relief under the CWA for ongoing, unpermitted discharges of pollutants by Exxon into Newtown Creek, a navigable water of the United States, in violation of 33 U.S.C. § 1311, which makes unlawful any discharge of a pollutant by any person without a permit.

## **I. Exxon's Greenpoint Spill**

Since at least the early 1900's, if not earlier, Exxon and its predecessors, including the Standard Oil Company, the Standard Oil Company of New York, and Mobil Oil Company, have owned and operated petroleum refinery and storage facilities – at times known as the Brooklyn Terminal – located in the Greenpoint neighborhood of Brooklyn, New York. At one point, these facilities included a large tank farm property (now a part of the Newtown Creek Wastewater Treatment Plant) and a refinery and storage facility that encompassed all of the land now bounded by North Henry Street, Greenpoint Avenue, Norman Avenue, Apollo Street, and Newtown Creek. Exxon still owns an inactive petroleum storage facility within that area.

During the many decades of Exxon's operation of its Greenpoint petroleum refinery and storage facilities, Exxon spilled, leaked, or otherwise discarded at least seventeen million gallons of various petroleum products and other non-petroleum pollutants from those facilities into the surrounding environment, including into the soils, subsurface soils, groundwater, and the surface waters and sediments of Newtown Creek. This widespread contamination has formed a massive plume of underground petroleum and other pollutants in the Greenpoint area (the Spill).

Exxon owns and operates two systems to recover only free petroleum product from the ground: (1) the Off-Site Free Product Recovery System (Off-Site Recovery System) located on Bridgewater Street, Greenpoint, New York, which includes an outfall into Newtown Creek located at the end of Meeker Avenue; and (2) the Brooklyn Terminal Free Product Recovery System (On-Site Recovery System) located at 400 Kingsland Avenue, Greenpoint, New York, which also includes an outfall into Newtown Creek. As an incident of their operation, these systems recover some contaminated groundwater, which is treated with carbon filters and/or airstrippers and then discharged into Newtown Creek through the two outfalls. Each of these outfalls is currently regulated by the State Pollution Discharge Elimination System (SPDES) program.

## **II. Exxon's Ongoing Violations of Clean Water Act: Unpermitted Discharges of Pollutants from Exxon Outfalls and from Newtown Creek Bulkheads**

The CWA prohibits the discharge of any pollutant from a point source into the waters of the United States, except pursuant to and in compliance with a permit. *See* 33 U.S.C. § 1311(a); 33 U.S.C. § 1342(a). The CWA defines "pollutant" broadly to include "dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water." 33 U.S.C. § 1362(6); *see also United States v. Hamel*, 551 F.2d 107, 111 (6th Cir. 1977) (finding that gasoline was a pollutant under the Act). The CWA defines a "point source" as "any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged." 33 U.S.C.

§ 1362(14); *see also Concerned Area Residents for the Environment v. Southview Farm*, 34 F.3d 114, 118-19 (2d Cir. 1994) (holding that Act’s point source definition should be “broadly interpreted”). The Creek is a navigable water of the United States. *See* 33 U.S.C. § 1362(7); *see also Rapanos v. United States*, 126 S.Ct. 2208, 2006 U.S. LEXIS 4887 (2006) (defining “navigable waters” as used in the CWA).

A. Violations Relating to Outfalls

Exxon is currently violating section 301(a) of the CWA by discharging unpermitted petroleum products and other pollutants into Newtown Creek through the On-Site and Off-Site Recovery Systems outfalls, which are pipes and thus point sources under the Act. The various chemicals being discharged by those outfalls originated from Exxon’s Spill and are pollutants under the CWA. The discharge of these pollutants is not currently authorized by the State’s SPDES program.

Although Exxon was likely aware of the discharge of these unpermitted pollutants because it, of course, had access to its own raw sampling data, it nevertheless failed to notify the State of the presence of these unpermitted pollutants as required by the Clean Water Act. The State discovered Exxon’s unpermitted discharges when it required Exxon to disclose the raw data from its monthly sampling events starting in early 2006. This raw data revealed that Exxon is discharging numerous unpermitted pollutants into the Creek through its two SPDES pipes, including lead, volatile solvents such as acetone, and other potentially toxic and/or carcinogenic chemicals that can cause great harm to public health or the environment. See the attached Exhibit A, which is a chart based on the raw sampling data the State has obtained to date that specifically identifies Exxon’s unpermitted pollutants, the particular pipe that discharged the unpermitted pollutant, and the dates of Exxon’s unpermitted discharges.

Based on the State’s understanding of Exxon’s On-Site and Off-Site Recovery Systems and how they have operated to date, and in light of the raw discharge data obtained by the State to date, the unpermitted discharges from Exxon’s SPDES pipes are occurring on a nearly daily basis and have occurred for at least the last five years, if not since the beginning of Exxon’s operation of the pipes. Each daily discharge of a single unpermitted pollutant from a point source constitutes a separate violation under the Clean Water Act, and the State fully intends to seek the appropriate penalties available under the Act for each violation.

B. Violations Relating to Newtown Creek Bulkheads

Exxon is also currently violating the Clean Water Act by discharging unpermitted petroleum products and other pollutants into Newtown Creek through bulkheads located at two properties that are adjacent to each other and border the Creek’s Greenpoint, Brooklyn shoreline. These two properties are commonly known as the Peerless Importers and Steel Equities properties. The Peerless Importers property is located at 26 Bridgewater Street and Meeker

Avenue (Block #2666, Lots 1, 52, 125), and the Steel Equities property is located at 100 and 120 Apollo Street and Bridgewater Street (Block #2666, Lots 101 and 201).

The plume of contaminants from Exxon's Spill has migrated, and continues to migrate, to the Creek. As it reaches the edge of the Creek – specifically the bulkheads located along the Creek's shoreline at the Peerless Importers and Steel Equities properties – these pollutants seep into the Creek's waters through cracks, fissures, and gaps in the bulkheads. The cracks, fissures, and gaps, as well as the bulkheads themselves, are point sources as defined by the Clean Water Act because they convey Exxon's spilled pollutants from the ground to the Creek's waters. The pollutants identified in Exhibit B, which is attached to this letter, are many of the pollutants that Exxon is discharging through the bulkhead seeps into Newtown Creek. The State also believes that one or more of the following petroleum products or constituents are also discharging from the bulkheads: crude oil, naphtha, fuel oils (Nos. 2, 4, or 6), kerosene, gasoline, gas oil, diesel fuel, and lead, among others. Many of these pollutants are potentially toxic and/or carcinogenic chemicals – such as benzene, which has been identified by the United States Environmental Protection Agency as a known carcinogen – that can cause great harm to public health and the environment.

Furthermore, the bulkhead seeps are nearly continuous in occurrence. Exxon does not have a permit to discharge any pollutants from the bulkheads at issue. Thus, each daily discharge of a single unpermitted pollutant from the bulkheads constitutes a separate violation under the Clean Water Act, and the State fully intends to seek the appropriate penalties available under the Act for each violation.

Exxon has been aware of these unpermitted bulkhead discharges for many years, and at least for the last five years, because it operated a boom containment system at the Peerless Importers bulkhead up until early 2005. During its operation of this system, Exxon regularly – perhaps even weekly – skimmed the water in the Creek for oil and other pollutants that had been illegally discharged by the bulkhead seeps. See the attached Exhibit C, which lists, among other things, all the dates for which the State can currently document an Exxon skimming event at the Peerless Importers bulkhead. Exxon may know of additional unpermitted discharges at that bulkhead.

Exxon is also aware of the unpermitted discharges at the Steel Equities bulkhead. The State recently approached Exxon and asked it to take responsibility for stopping the discharges at Steel Equities. Exxon declined.

The bulkhead seeps at the Peerless Importers and Steel Equities properties are ongoing, as documented by Exhibit C, which identifies all unpermitted bulkhead discharges known to the State at this point. Riverkeeper, a nonprofit environmental watchdog organization, has also documented numerous unpermitted discharges at the bulkheads, and Exxon is already aware of those discharges through the Clean Water Act suit brought by Riverkeeper against Exxon in 2004. *See Riverkeeper v. Exxon Mobil Corp.*, Civil Case No. 04-2056 (CBA/RLM) (E.D.N.Y.);

Riverkeeper Notice of Intent to Sue Letter for Clean Water Act Violations, dated January 20, 2004; *see also* Exhibit C, attached hereto, which lists, among other things, unpermitted bulkhead discharges observed by Riverkeeper. Each of the discharges listed in the attached Exhibit C constitutes a separate violation of the Clean Water Act and the State will seek the appropriate penalties available under the Act for each such violation.

### **III. Exxon's Violations Are Harming the State of New York**

Exxon's unpermitted discharges from its On-Site and Off-Site Recovery Systems outfalls and from the bulkheads at the Steel Equities and Peerless Importers properties constitute ongoing and significant violations of the Clean Water Act that have inflicted, and continue to inflict, great harm upon the State of New York, its citizens and residents, and the environment. The pollutants illegally discharged to date by Exxon – various kinds of petroleum, petroleum compounds and constituents, toxic metals, and volatile and semi-volatile compounds, among others – pose a significant threat to the health of those New York citizens and residents who use the Creek, and connected surface waters, for subsistence fishing, crabbing, and recreational activities, as well as to those who live close to the Creek. Exxon's illegal discharges, furthermore, have helped to create an offensive nuisance that interferes with the enjoyment of the environment by nearby residents.

New York's environment also continues to suffer because of Exxon's ongoing illegal discharges. The Creek is a water of the State of New York. Exxon's pollution of the Creek contributes to the degradation of its water quality, and in turn, threatens the recently improving water quality of New York Harbor, of which the Creek is a tributary. Exxon's pollution of the Creek also harms the State-owned tidal wetlands found in the Creek, which are a valuable resource for the protection of water quality. Exxon's pollution, furthermore, poses a serious threat to all of the Creek's wildlife, including any birds, fish, crustaceans, shellfish, or benthic organisms that live in, or near, the Creek, or that frequent it for food.

Finally, the State itself has also been harmed by Exxon's illegal discharges as it has had to expend monies and resources to attempt to stop, ameliorate, or mitigate the public health risks and environmental harms associated with Exxon's pollution of the Creek. The State anticipates that these efforts will increase in the future and that it will be forced to expend substantial monies and resources to address Exxon's ongoing pollution of the Creek.

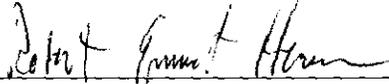
Exxon will remain in violation of the CWA each day that oil and other pollutants are discharged through the bulkheads into the Creek and each day it discharges unpermitted pollutants from its On-Site and Off-Site Recovery Systems. As noted in 33 U.S.C. § 1319(d) and 40 C.F.R. § 19.4, violations are subject to a civil penalty not to exceed \$32,500 for each such violation. At the close of the 60-day notice period, the State intends to file a citizen suit under section 505(a) of the CWA, 33 U.S.C. § 1365(a), against Exxon. The State intends to seek penalties, injunctive relief, legal fees and costs for these violations of the CWA.

The claims set forth above are not exclusive. This Notice of Intent to Sue is sent without waiver of or any prejudice to the rights of the State of New York, the Attorney General of the State of New York, or any other agency or officer of the State of New York to advance any additional or further legal and/or factual claims, including any federal claim for relief and/or state law and/or common law cause of action based upon information or facts that are now known or may become known in the future.

This Notice of Intent to Sue sufficiently states grounds for filing suit and conforms with all requirements of 33 U.S.C. § 1365(b) and 40 C.F.R. § 135.3(a). During the 60-day CWA notice period, the State remains willing to discuss effective remedies for the violations noted in this letter. If you wish to pursue discussions in the absence of litigation, please initiate such discussions within ten (10) days of receiving this Notice. At the close of the 60-day period, unless significant progress is made in remedying these violations, the State will file a citizen suit against Exxon under CWA section 505(a), 33 U.S.C. § 1365(a). If you wish to discuss these matters further, please do not hesitate to contact the undersigned.

Sincerely,

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<b>EXHIBIT A</b>												
<b>UNPERMITTED POLLUTANTS DISCHARGED BY EXXON</b>												
<b>THROUGH ITS OFF-SITE AND ON-SITE SPDES PIPES (2006)</b>												
<b>OFF-SITE</b>	<b>1/11/2006</b>	<b>2/9/2006</b>	<b>3/9/2006</b>	<b>4/5/2006</b>	<b>5/11/2006</b>	<b>6/22/2006</b>	<b>7/11/2006</b>	<b>8/10/2006</b>	<b>9/26/2006</b>	<b>10/13/2006</b>	<b>11/29/2006</b>	<b>12/28/2006</b>
acetone	X					X	X	X	X	X	X	X
2-butanone						X			X			
carbon disulfide	X											
chlorobenzene	X							X				
1,1-dichloroethane	X	X	X	X	X	X	X	X	X	X		X
1,2-dichloroethane						X		X	X	X		
methyl tert butyl ether	X	X	X	X	X	X	X	X	X	X	X	
1,1,2-trichloroethane									X		X	
4-methyl-2-pentanone	X						X			X	X	
1,2,4-trimethylbenzene	X	X	X	X	X	X	X	X	X	X		
1,3,5-trimethylbenzene	X	X	X	X	X	X	X	X	X	X	X	
chloroethane			X	X	X	X	X	X	X	X		X
chloromethane											X	
isopropylbenzene											X	
n-propylbenzene											X	
vinyl chloride										X		
methylene chloride			X			X						
arsenic										X		
Iron	X	X	X	X	X	X	X	X	X	X	X	
lead							X	X	X			
manganese	X	X	X	X	X	X	X	X	X	X	X	
magnesium												X
sodium												X
boron												X
barium												X
<b>ON-SITE</b>	<b>1/11/2006</b>	<b>2/9/2006</b>	<b>3/13/2006</b>	<b>4/5/2006</b>	<b>5/15/2006</b>	<b>6/22/2006</b>	<b>7/17/2006</b>	<b>8/11/2006</b>	<b>9/15/2006</b>	<b>10/17/2006</b>	<b>11/28/2006</b>	<b>12/28/2006</b>
acetone					X							
sec-butylbenzene		X	X									
tert-butylbenzene		X	X									
cis-1,2-dichloroethylene		X		X	X	X		X	X	X	X	
hexane		X	X									
p-isopropyltoluene		X	X									
n-butylbenzene											X	
methylene chloride												X
naphthalene		X	X									
1,2,3-trichlorobenzene			X									
1,2,4-trimethylbenzene		X	X						X			
1,3,5-trimethylbenzene		X	X						X			
tetrachloroethylene		X	X					X	X		X	X
trichloroethylene					X		X		X	X		X
boron												X
barium												X
Iron				X								X
manganese												X
magnesium												X
sodium												X

\* All units are in ug/L

## EXHIBIT B

### POLLUTANTS DISCHARGING FROM BULKHEADS

benzene  
toluene  
ethylbenzene  
xylenes  
methyl tert butyl ether (MTBE)  
naphthalene  
1,2,4-trimethylbenzene  
1,3,5-trimethylbenzene  
n-butylbenzene  
isopropylbenzene  
n-propylbenzene  
p-isopropyltoluene  
sec-butylbenzene  
acenaphthene  
fluorene  
phenanthrene  
anthracene  
fluoranthene  
pyrene  
benzo(a)anthracene  
chrysene  
benzo(b)fluoranthene  
benzo(k)fluoranthene  
benzo(a)pyrene  
indeno(1,2,3-cd)pyrene  
dibenz(a,h)anthracene  
benzo(g,h,i)perylene  
t-amyl methyl ether  
t-butyl alcohol  
chloroform  
1,1-dichloroethane  
cis-1,2-dichloroethene  
tetrachloroethene  
trichloroethene  
vinyl chloride  
bis(2-ethylhexyl)phthalate  
sec-butylbenzene  
cyclohexane  
1,2,4-trichlorobenzene  
benzo(b)pyrene  
2-methylnaphthalene  
acetone  
tert-butylbenzene  
chlorobenzene  
heptane

## EXHIBIT C

### Observations of Unpermitted Bulkhead Discharges into Newtown Creek

Date	Witness
February 6, 2002	Exxon
July 2, 2002	Exxon
July 10, 2002	Exxon
July 23, 2002	Exxon
August 1, 2002	Exxon
August 6, 2002	Exxon
August 13, 2002	Exxon
October 25, 2002	Riverkeeper
December 11, 2002	Riverkeeper
December 16, 2002	Exxon
January 8, 2003	Exxon
January 15, 2003	Exxon
January 20, 2003	Exxon
February 6, 2003	Exxon
February 13, 2003	Exxon
February 25, 2003	Exxon
March 11, 2003	Exxon
March 18, 2003	Exxon
March 20, 2003	Exxon
April 1, 2003	Exxon
April 8, 2003	Exxon
April 15, 2003	Exxon
April 22, 2003	Exxon
April 29, 2003	Exxon
May 5, 2003	Riverkeeper

May 6, 2003	Exxon
May 12, 2003	Riverkeeper
May 20, 2003	Exxon
May 29, 2003	Exxon
June 3, 2003	Exxon
June 9, 2003	Riverkeeper
June 10, 2003	Exxon
June 17, 2003	Exxon
June 24, 2003	Exxon
July 2, 2003	Exxon
July 9, 2003	Exxon
July 14, 2003	Exxon
July 22, 2003	Exxon
July 29, 2003	Exxon
August 5, 2003	Exxon
August 11, 2003	Riverkeeper
August 12, 2003	Riverkeeper and Exxon
August 19, 2003	Exxon
August 26, 2003	Exxon
August 27, 2003	Riverkeeper
September 4, 2003	Exxon
September 9, 2003	Exxon
September 10, 2003	Riverkeeper
September 18, 2003	Exxon
September 22, 2003	Riverkeeper
September 23, 2003	Exxon
September 29, 2003	Exxon
October 9, 2003	Exxon
October 14, 2003	Exxon

October 17, 2003	Riverkeeper
October 21, 2003	Exxon
October 30, 2003	Riverkeeper and Exxon
November 4, 2003	Exxon
November 11, 2003	Exxon
November 13, 2003	Riverkeeper
November 18, 2003	Exxon
November 25, 2003	Riverkeeper
November 26, 2003	Exxon
December 10, 2003	Exxon
December 15, 2003	Exxon
January 9, 2004	Exxon
February 13, 2004	Exxon
March 2, 2004	Exxon
March 3, 2004	Exxon
March 11, 2004	Exxon
March 15, 2004	Exxon
March 23, 2004	Exxon
March 25, 2004	Riverkeeper
April 7, 2004	Exxon
April 12, 2004	Exxon
April 20, 2004	Exxon and Riverkeeper
April 21, 2004	Riverkeeper
April 28, 2004	Exxon
April 29, 2004	Exxon
May 10, 2004	Riverkeeper
May 11, 2004	Exxon
May 13, 2004	Exxon
May 19, 2004	Exxon

May 24, 2004	Exxon
May 25, 2004	Riverkeeper
June 3, 2004	Exxon
June 5, 2004	Riverkeeper
June 15, 2004	Exxon
July 1, 2004	Riverkeeper
July 2, 2004	Riverkeeper
July 6, 2004	Riverkeeper
July 14, 2004	Exxon and Riverkeeper
July 15, 2004	Exxon and Riverkeeper
July 20, 2004	Exxon
July 28, 2004	Riverkeeper
July 29, 2004	Riverkeeper
August 4, 2004	Exxon
August 11, 2004	Exxon
August 12, 2004	Riverkeeper
August 13, 2004	Riverkeeper
August 14, 2004	Riverkeeper
August 15, 2004	Riverkeeper
August 16, 2004	Riverkeeper
August 17, 2004	Riverkeeper
August 18, 2004	Exxon and Riverkeeper
August 19, 2004	Riverkeeper
August 26, 2004	Exxon
September 3, 2004	Exxon
September 23, 2004	Riverkeeper
November 2, 2004	Exxon

November 11, 2004	Exxon
November 12, 2004	Riverkeeper
November 15, 2004	Riverkeeper
November 22, 2004	Exxon
December 8, 2004	Riverkeeper
December 14, 2004	Riverkeeper
December 16, 2004	Riverkeeper
February 2, 2005	Exxon
February 9, 2005	Exxon
March 10, 2005	Exxon
March 15, 2005	Exxon
March 22, 2005	Exxon
April 5, 2005	Riverkeeper
April 7, 2005	Riverkeeper
April 12, 2005	Riverkeeper
April 13, 2005	Riverkeeper
April 15, 2005	Riverkeeper
May 31, 2005	Riverkeeper
June 21, 2005	Riverkeeper
July 28, 2005	Riverkeeper
July 29, 2005	Riverkeeper
August 26, 2005	Riverkeeper
September 1, 2005	Riverkeeper
September 20, 2005	Riverkeeper
October 14, 2005	Chevron
October 28, 2005	Riverkeeper
November 1, 2005	Riverkeeper
November 3, 2005	Riverkeeper

November 5, 2005	Riverkeeper
November 7, 2005	Riverkeeper
November 9, 2005	Riverkeeper
December 1, 2005	Riverkeeper
December 2, 2005	Riverkeeper
December 8, 2005	Chevron
December 15, 2005	Riverkeeper
December 16, 2005	Riverkeeper
December 20, 2005	Chevron
December 23, 2005	Chevron
December 27, 2005	Chevron
December 30, 2005	Chevron
January 6, 2006	Chevron
January 10, 2006	Chevron
January 24, 2006	Chevron
January 27, 2006	Chevron
February 3, 2006	Chevron
February 7, 2006	Chevron
February 8, 2006	Riverkeeper
February 14, 2006	Chevron
February 23, 2006	Chevron
March 6, 2006	Chevron
March 20, 2006	Chevron
March 23, 2006	NYSDEC
March 27, 2006	Chevron
April 18, 2006	Chevron
April 20, 2006	Chevron
May 1, 2006	Chevron
May 11, 2006	Riverkeeper

May 17, 2006	NYSDEC
May 22, 2006	NYSDEC
May 23, 2006	NYSDEC
May 30, 2006	Riverkeeper and NYSDEC
May 31, 2006	Riverkeeper and NYSDEC
June 1, 2006	NYSDEC
June 2, 2006	NYSDEC
June 5, 2006	NYSDEC
June 6, 2006	NYSDEC
June 7, 2006	NYSDEC
June 19, 2006	NYSDEC
June 20, 2006	NYSDEC
June 21, 2006	NYSDEC
June 28, 2006	NYSDEC
July 5, 2006	NYSDEC
July 6, 2006	NYSDEC
July 7, 2006	Riverkeeper and NYSDEC
July 10, 2006	NYSDEC
July 11, 2006	NYSDEC
July 12, 2006	NYSDEC
July 14, 2006	NYSDEC
July 17, 2006	NYSDEC
July 18, 2006	NYSDEC
July 24, 2006	NYSDEC
July 26, 2006	Riverkeeper
July 27, 2006	NYSDEC and Riverkeeper
August 1, 2006	NYSDEC
August 2, 2006	NYSDEC

August 15, 2006	NYSDEC
August 17, 2006	Riverkeeper
August 28, 2006	NYSDEC
August 29, 2006	NYSDEC
August 30, 2006	NYSDEC
September 5, 2006	NYSDEC
September 6, 2006	NYSDEC
September 7, 2006	NYSDEC
September 8, 2006	Riverkeeper
September 11, 2006	NYSDEC
September 12, 2006	NYSDEC
September 13, 2006	NYSDEC
September 14, 2006	NYSDEC
September 18, 2006	Riverkeeper
October 3, 2006	NYSDEC
October 4, 2006	NYSDEC
October 13, 2006	Riverkeeper
October 16, 2006	Riverkeeper
October 18, 2006	Riverkeeper
October 24, 2006	NYSDEC
October 25, 2006	NYSDEC
October 31, 2006	NYSDEC
November 8, 2006	NYSDEC
November 10, 2006	Riverkeeper
November 14, 2006	NYSDEC
November 15, 2006	Riverkeeper and NYSDEC
November 16, 2006	NYSDEC
November 17, 2006	NYSDEC

November 18, 2006	NYSDEC
November 21, 2006	NYSDEC
November 27, 2006	NYSDEC
November 28, 2006	NYSDEC
November 29, 2006	NYSDEC
December 17, 2006	Riverkeeper
December 18, 2006	Riverkeeper
January 2, 2007	NYSDEC
January 25, 2007	Riverkeeper