

FPM Group, Ltd.
FPM Engineering Group, P.C.
formerly Fanning, Phillips and Molnar

CORPORATE HEADQUARTERS 909 Marconi Avenue Ronkonkoma, NY 11779 631/737-6200 Fax 631/737-2410

VIA OVERNIGHT COURIER

June 23, 2008



Mr. Dennis McChesney Chief, Groundwater Compliance Section US Environmental Protection Agency 290 Broadway, 20th Floor New York, NY 10007-1866

Re: UIC Closure Plan

I.W. Industries, Inc. Site NYSDEC Registry # 1-52-102 FPM File No. 944-07-01

Dear Mr. McChesney:

In accordance with direction from the New York State Department of Environmental Conservation (NYSDEC), we are submitting this Underground Injection Control (UIC) Closure Plan for three stormwater leaching pools (Class V injection wells) at the above-referenced facility. This UIC Closure Plan includes information concerning the facility and its history, details concerning previous investigation and remediation of the targeted leaching pools, the background information regarding the NYSDEC requirement for abandonment of the targeted leaching pools, and the proposed abandonment procedures.

Site History

The I. W. Industries, Inc. site (hereafter referred to as the "Site") is located at 35 Melville Park Road, Melville, New York. The Site is an approximately six-acre property occupied by an approximately 97,000-square-foot masonry building, associated paved parking areas, and landscaped vegetation and was formerly used for manufacture of threaded metal parts.

I.W. Industries, Inc. (hereinafter "IWI") occupied the Site since it was developed in approximately 1966 and manufactured threaded metal parts onsite until approximately 2005. These parts were milled from brass rods, composed of copper, zinc, and lead. The manufacturing process produced scrap brass with associated lubrication and cutting oils. Washing of the finished parts produced wastewater, which was discharged to two leaching pools (LP-1 and LP-2) under a State Pollutant Discharge Elimination System (SDPES) permit prior to 1984. Onsite management of scrap also resulted in some inadvertent discharges of scrap brass and oils to other onsite leaching pools. Figure 1 (attached) shows the LP-1 through LP-3 leaching pool locations relative to other features on the southwestern portion of the Site. In 1982 oil and/or oil emulsion were noted to be present in several leaching pools and on November 5, 1982 IWI entered into an Order on Consent with the Suffolk County Department of

Health Services (SCDHS) for the elimination of wastewater discharges and cleanout of the leaching pools. By January 4, 1983 the SCDHS reported that all floating oil had been removed from the leaching pools and in 1983 an ultrafiltration unit was installed to reduce discharges from the parts washing machine. By October 28, 1986 IWI had switched to a hold and haul operation for the disposal of washwater and was no longer discharging to onsite leaching pools.

Soil and groundwater investigations were conducted in the 1980s and 1990s; subsequently the property was listed as a NYSDEC Inactive Hazardous Waste Disposal site due to the leaching pool discharges and detected groundwater impacts. A Remedial Investigation (RI) was performed in 1997 following a NYSDEC-approved RI Work Plan; the work was overseen by the NYSDEC. The RI included sampling and analysis of the leaching pools, soil, and groundwater for Target Compound List (TCL) volatile and semivolatile organic compounds (VOCs and SVOCs) and Target Analyte List (TAL) metals. PCBs were not tested since IWI's Material Safety Data Sheets indicated that all of their cutting oils and lubricants were non-PCB oils and numerous historic waste characterization tests had not shown the presence of PCBs. The RI findings are summarized as follows:

- Several leaching pools were identified with sediments requiring remediation;
- No soil requiring remediation was identified;
- VOCs (related to the adjoining New York Twist Drill site) and metals were present in onsite groundwater; and
- Free-phase product was found at wells downgradient of leaching pools LP-1 and LP-2.

Remediation activities were conducted in 2000 following the issuance of the Record of Decision (ROD) by the NYSDEC on March 30, 2000 and were documented in a Remedial Action Report (November 2000). Remediation included removal of impacted sediments from select leaching pools, including LP-3. Verification samples were collected from the remediated leaching pools and were compared with the cleanup goals. The concentrations of SVOCs and metals formerly present in the leaching pools were significantly reduced. No further remediation of the leaching pools was required by the NYSDEC at that time.

IWI ceased operations and vacated the Site in early 2006. Resource Conservation and Recovery Act (RCRA) closure activities were subsequently conducted under a RCRA Closure Plan approved by the NYSDEC and were overseen by NYSDEC representatives. RCRA closure activities were completed and the results were documented in Phase I and Phase II Closure Reports (July 2007) submitted to the NYSDEC and approved on September 5, 2007.

Additional non-RCRA facility closure activities were conducted in 2006 and 2007 under SCDHS oversight and were documented in a November 13, 2007 correspondence to the SCDHS. These activities included sampling and remediation of select leaching pools. The SCDHS performed an ongoing review of this work while in progress and, after work completion, determined that abandonment of leaching pools LP-1, LP-2, and LP-3 was required. The NYSDEC reviewed this information and also required abandonment of leaching pools LP-1 through LP-3 as an engineering control under an Order on Consent for this Site, as discussed further below.



Status of LP-1 through LP-3

As shown on the attached Figure 1, leaching pools LP-1 and LP-2 are situated to the southwest of the onsite building. As discussed above, these leaching structures were formerly used to discharge washwater under a SPDES permit. However, this usage was discontinued in 1986. Since that time, LP-1 and LP-2, which are solid-cover structures, have received only stormwater from the roof over the front portion of the building. LP-1 is the primary structure and LP-2 is an overflow structure to LP-1. LP-3, which has a grated cover, is located to the west of a former interior loading dock and was formerly connected to a drain within the loading dock. This drain was sealed with concrete at some time in the late 1980s/early 1990s. Since that time, LP-3 has received only stormwater runoff from the parking lot. LP-1 through LP-3 are, therefore, Class V injection wells.

Oil was removed from these structures on several occasions in the 1980s and the sediments in the structures were sampled in 1997 during the RI. The NYSDEC did not require remedial work at LP-1 or LP-2 under the ROD, but impacted sediments were removed from LP-3 to the NYSDEC's satisfaction in 2000. A visual inspection of these leaching pools and sampling of select pools was conducted under SCDHS supervision during facility closure in 2006. Remediation was conducted at LP-1 and LP-3 in August 2006 and an endpoint sample was collected from LP-3. The summarized data are shown in Table 1; the NYSDEC reviewed these data and did not require further work except at LP-1, LP-2, and LP-3, as the endpoint results from the other leaching pools are below the NYSDEC Objectives to be protective of groundwater (6 NYCRR Subpart 375-6.8(b)).

Although the analytical results for leaching pool LP-1 indicated that no targeted VOCs and SVOCs were detected, sediment within the leaching pool appeared visibly impacted and the copper and lead levels were elevated. Based on these observations, the SCDHS recommended that the soil beneath leaching pools LP-1 and LP-2 (LP-2 is the overflow pool for LP-1) be vertically profiled by performing a soil boring through each pool and collecting soil samples from depths of 20, 30, and 40 feet below grade. The borings were conducted with SCDHS supervision on September 25, 2006. The laboratory results are summarized in Table 2; chromium, copper, lead, and/or chrysene were found to exceed SCDHS Cleanup Objectives in several samples. The boring logs (attached) showed the soils to be visually impacted to varying degrees to the full depth penetrated.

To assess potential impacts from the materials remaining in LP-1 through LP-3, annual groundwater monitoring has been conducted at downgradient wells MW-1, MW-2, MW-3, and/or MW-10 since remediation was completed in 2000. The results have been reported annually to the NYSDEC and have shown no exceedances of the NYSDEC Class GA Ambient Water Quality Standards for chromium, copper, lead, or chrysene, as shown on Tables 3A and 3B. It has been concluded that the materials remaining in these leaching pools do not present a threat to groundwater. However, to further isolate these materials from the environment, both the SCDHS and the NYSDEC have concluded that abandonment of the LP-1 through LP-3 leaching pools is necessary. NYSDEC subsequently issued an Order on Consent (Index #W1-0725-04-09) to the Site purchaser, Metro Assets III, LLC, to complete the remedial program for this Site, as described below. The Order on Consent requires the abandonment of leaching pools LP-1, LP-2, and LP-3.



Current Regulatory Status and UIC Closure

This UIC Closure Plan is required by the NYSDEC for fulfillment of remedial action at the I.W. Industries, Inc. Site under the New York State Inactive Hazardous Waste Disposal Site remedial program. The previous owner of the Site, IWI, entered into an Order on Consent (Index No. W1-0725-00-06) for the development and implementation of a remedial program for the Site. Pursuant to that Order, the Site was investigated and subsequently remediated by IWI, as discussed above, with the approval of the NYSDEC.

Metro Assets III, LLC (Metro) subsequently purchased the Site under a U.S. Bankruptcy Court Order. Under this Court Order, Metro has continuing obligations with respect to the remedial program for the Site; consequently, the NYSDEC issued an Order on Consent (Index #W1-0725-04-09) to Metro to complete the remedial program for this Site. The Order on Consent also requires implementation of any required institutional and engineering controls. One of the engineering controls for the Site, as identified by the NYSDEC in the Order on Consent, is the abandonment of leaching pools LP-1 through LP-3. The NYSDEC has directed Metro to prepare this UIC Closure Plan for USEPA approval for the abandonment of LP-1 through LP-3. A Site Management Plan (SMP) is also required to provide for monitoring of the completed engineering control. The SMP has been prepared and is pending NYSDEC approval; the SMP includes procedures for monitoring of the seals to be installed above abandoned leaching pools LP-1 through LP-3.

Procedures for Abandonment of LP-1 through LP-3

It should be noted that although Metro will be undertaking the abandonment activities, the Site has been sold to a new owner and redeveloped for use as office and warehouse space. Therefore, the proposed abandonment activities must also be coordinated with the current Site owner.

Abandonment of leaching pools LP-1 through LP-3 will include five general steps:

- Verification of existing construction;
- Design of replacement leaching pools;
- Installation of replacement leaching pools and piping;
- Backfilling and sealing of LP-1 through LP-3; and
- Reporting.

The USEPA and NYSDEC shall be provided with at least one week's notice prior to any field activities such that an observer may be present. FPM will also provide oversight of all field activities.

Verification of Existing Construction

Although it is generally understood that LP-1 and LP-2 are connected to roof drainage piping for the front of the building and LP-3 is no longer connected to any piping, this information must be verified for design purposes. It must also be confirmed that no additional overflow structures



are connected to these leaching pools. Accordingly, a drain-tracing contractor will be engaged to perform a survey to verify the nature and layout of all of the piping connected to each of the targeted leaching pools and to assess whether overflow structures may be present. Drain tracing methods will include flow and/or dye testing, snaking, radio-tracing, and geophysical methods (electromagnetic and ground-penetrating radar), as appropriate. This survey will also be used to locate any subsurface utilities that may be present in the areas targeted for work. The locations of each structure, any associated piping, and subsurface utilities will be marked on the ground surface at the site and a diagram shall be prepared showing all of the survey information.

FPM will observe the survey to verify the information obtained. FPM will also obtain a copy of the survey results to be used in the design of the replacement structures.

Design of Replacement Structures

The verified existing construction information will be used to develop plans for the replacement of the LP-1 through LP-3 leaching pools. It is anticipated that leaching pools LP-1 and LP-2 will be moved to a location to the south of the existing building and away from existing subsurface infrastructure and that they will be reconnected to the existing roof drainage piping. It is also anticipated that a solid-bottom catch basin will be used to capture parking lot stormwater runoff at the existing LP-3 location and direct this runoff to a new leaching pool to be constructed along the west side of the Site. The plans for the replacement leaching pools will show the proposed pool locations and reconfigured piping, design details as necessary, and calculations. These plans will be coordinated with the Site owner to ensure that the proposed new leaching pool locations do not conflict with subsurface utilities, other leaching facilities, groundwater monitoring wells, or facility operations. Permits for the proposed replacement structures will be obtained as necessary.

Installation of Replacement Leaching Pools and Piping

Following plan approval, the replacement leaching pools will be constructed. The existing piping presently connected to LP-1 and LP-2 will then be disconnected and reconnected to the new leaching pools. The LP-1 and LP-2 structures will then be abandoned, as discussed below. At LP-3, the leaching pool must first be abandoned by backfilling, as discussed below, so that the catch basin can be installed. Once the replacement catch basin is installed, it will be connected to the replacement LP-3 leaching pool via new piping.

Abandonment of LP-1 though LP-3 will include backfilling each structure with clean backfill material. The backfill used will be the onsite sand and gravel generated from the installation of the new leaching pools and/or NYSDOT-approved road-grade RCA of an appropriate size for use beneath pavement. The backfill will be placed to within approximately one foot of grade and in a manner so as to permit minimal settlement (in the case of LP-3, the backfill will be placed appropriately such that the new solid-bottom catch basin may be installed above the backfill). Following backfill placement, the top foot of each structure will be filled with concrete as a seal (in the case of LP-3, this concrete seal will be placed outside of the catch basin). A filter fabric may be used between the backfill and concrete if necessary to prevent loss of concrete into the fill. The steel leaching pool lids and rings will be removed and the area overlying the concrete will be repaved in kind with the surrounding pavement.

FPM will observe and document the construction and abandonment activities.



Reporting

Following the completion of abandonment activities, a report shall be prepared to document the above-described work. The report shall include a copy of the construction survey information, the design plans for the replacement leaching pools, copies of field logs verifying the construction and abandonment activities, photographs documenting the work progress, and a site plan showing the final leaching pool configuration. This report shall be submitted to the USEPA and copied to the NYSDEC.

Please confirm your approval of the above-described scope of work at your earliest convenience. Should you have any questions, please do not hesitate to call me at (631) 737-6200, ext. 228.

Sincerely,

Stephanie O. Davis Senior Hydrogeologist Department Manager

SOD:tac Attachments

cc: Brian Jankauskis, NYSDEC w/attachments John A. Jakub, Esq. w/attachments

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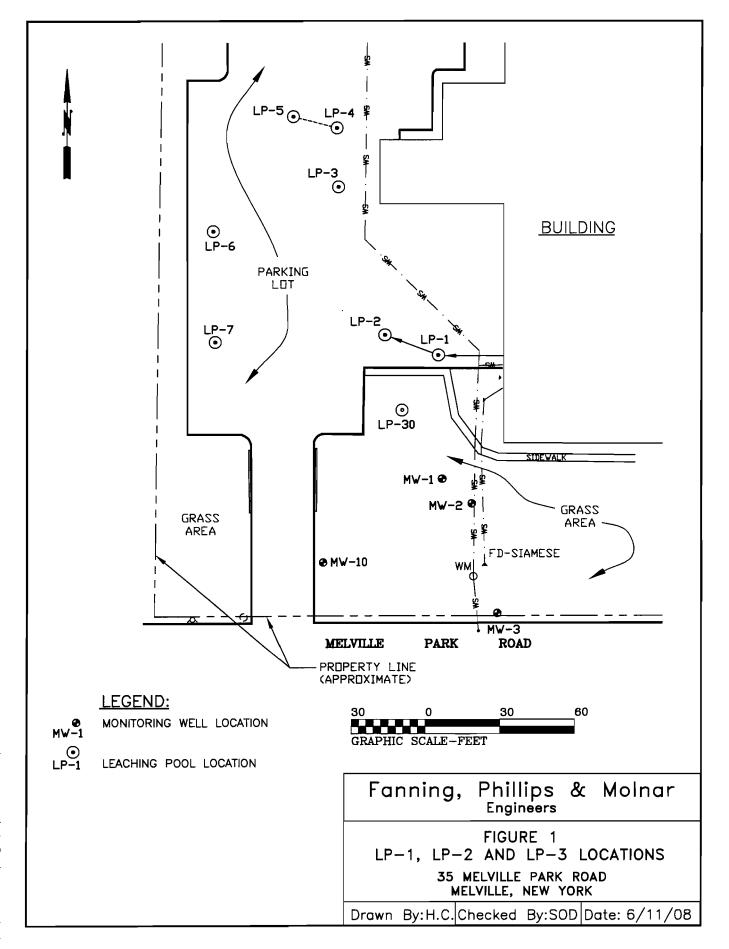


TABLE 1 LP-1 AND LP-3 CHEMICAL ANALYTICAL DATA 35 MELVILLE PARK ROAD, MELVILLE, NEW YORK

Sample No.	LP-1	LP	-3*		-	
Sample Type	Initial	Initial	End-Point	NYSDEC Cleanup	SCDHS Action	SCDHS Cleanup
Sample Depth (feet)	20	17	21	Objectives	Levels	Objectives
Sampling Date	4/26/06	4/26/06	8/15/06			
Volatile Organic Compounds in ug/kg	ND	ND	NA	-	-	-
Semivolatile Organic Compounds	in ug/kg					
Fluoranthene	ND	4,400	NA	50,000	75,000	50,000
Phenanthrene	ND	1,200	NA	50,000	75,000	50,000
Pyrene	ND	3,300	NA	50,000	75,000	50,000
Benzo(a)anthracene	ND	1,400	NA	224	6,000	3,000
Chrysene	ND	2,700	NA	400	800	400
Benzo(b)fluoranthene	ND	1,500	NA	224	2,200	1,100
Benzo(k)fluoranthene	ND	1,700	NA	224	2,200	1,100
Benzo(a)pyrene	ND	1,100	NA	61	22,000	11,000
Total Metals in mg/kg						
Arsenic	1.78	2.45	ND	7.5	25	7.5
Cadmium	1.10	ND	ND	10	10	1
Chromium	11.5	41.9	ND	50	100	10
Copper	1,740	13,500	168	25	500	25
Lead	436	745	116	400	400	100
Nickel	4.78	16.7	ND	13	1,000	13
Silver	ND	2.73	ND	SB	100	5

Notes:

Only analytes detected in one or more samples are included in this table. See lab report for complete data.

Bold shaded values for initial samples exceed the SCDHS Action Level.

Bold shaded values for end-point samples exceed the SCDHS Soil Cleanup Objectives.

NA = Not Analyzed.

ND = Not Detected

ug/kg = micrograms per kilogram

mg/kg = milligrams per kilogram



^{*}Leaching pool remediated in 2000.

TABLE 2 LP-1 AND LP-2 SOIL BORING SAMPLES I.W. INDUSTRIES SITE 35 MELVILLE PARK ROAD, MELVILLE, NEW YORK

Leaching Pool		LP-1			LP-2		SCDHS Cleanup
Sample Depth (feet)	20-22	28-30	38-40	20-22	28-30	38-40	Objectives
TCL Semivolatile Organic	Compoun	ds in mici	rograms p	er kilogra	ım		
Bis(2-ethylhexyl)phthalate	ND	ND	910	ND	ND	ND	-
Chrysene	ND	ND	470	ND	ND	ND	400
SCDHS Metals in milligram	s per kild	gram					
Arsenic	1.35	0.66	ND	ND	1.13	2.23	7.5
Chromium	15.9	27.5	24.8	9.57	23.2	8.38	10.0
Copper	189	82.9	91.4	151	175	18.6	25.0
Lead	200	134	217	154	534	19.9	100.0
Nickel	2.98	4.15	3.58	3.44	3.89	3.32	13.0

Notes:

Samples collected on September 25, 2006

Only detected analytes are summarized on this table. See lab report for complete data.

ND = Not detected

- = Not established.

SCDHS = Suffolk County Department of Health Services

Bold shaded values exceed SCDHS Cleanup Objectives.



TABLE 3A POST-REMEDIATION GROUNDWATER SAMPLE DATA MW-1, MW-2, MW-3 AND MW-10 - ORGANIC PARAMETERS I.W. INDUSTRIES, MELVILLE, NEW YORK

Well No.			MW-1			MW-2	/-2		MW-3					MW-10				
Sampling Date	3/22/01	3/30/04	3/23/05	3/8/06	6/29/07	3/8/06	6/29/07	3/22/01	3/8/06	6/29/07	3/22/01	3/27/02	3/20/03	3/30/04	3/23/05	3/8/06	6/29/07	NYSDEC GA Standards
Sampling Depth (ft)	•		52.85			52	2		49.2					58				
Volatile Organic Compounds in ug/l	n ug/l																	
1,2-Dichloroethene	3 J	_	3.7 J	1.4J	<u> </u>	_	C	NS	C	C	6	50	3၂	6	6.7	C	С	ហ
1,1-Dichloroethane	U	C	_	U	U	С	_	NS	⊂	U	ا ل	ហ	2 يا	_	_	C	⊂	σ
Trichloroethene	U	U	C	C	U	С	<u> </u>	NS	_	U	2 J	21	5 J	2 یا	4.9 J	_	M	თ
Chlorobenzene	20	9	6.8	1.5 J	25	0.92 J	4.3 J	NS	U	C	ل 1	C	2 يا	18	3.4 J	⊂	C	ហ
Tetrachloroethene	U	U	0.57 J	1.1 J	U	J 99.0	1.3 J	SN	4.4 J	2.6 J	6	4	15	8	18	10	3.6 J	σ
1,1,1-Trichloroethane	C	U	U	n	U	C	C	NS	C	C	2 ا	6٦	Γ2	U	U	U	_	ან
cis-1,2-Dichloroethene	C	U	U	Ŋ	7.3	C	ا.1 ل	SN	_	C	C	C	U	U	U	_	C	თ
Semivolatile Organic Compounds in ug/l	nds in ug/l																	
1.2-Dichlorobenzene	1 J	U	U	U	3.7 J	C	C	1 ل	C	C	n	0.7 J	C	1 ل	C	_	C	ω
1,3-Dichlorobenzene	NA	U	C	C	U	С	_	NA	C	C	AN	1 JM	U	1 J	_	C	C	3
1,4-Dichlorobenzene	3 J	U	2 J	C	2.1 J	r 6.0	ل 0.52 ل	3 J	_	C	2 يا	3 J	2 ا	6٦	C	_	⊂	ω
bis(2-Ethylhexyl)phthalate	U	U	U	U	C	С	_	1 JB	C	U	С	U	U	U	C	_	C	50
Chrysene	C	U	Ū	U	C	C	C	U	U	U	_	U	U	N	U	_	⊂	0.002
Diethylphthalate	1 J	U	U	U	U	U	C	ال 1	N	U	n	U	U	U	U	_	U	50

Notes:

Only analytes detected in one or more samples are included in this table. Sample Depth refers to well depth.

ug/l = micrograms per liter.

NS = Not Sampled.

NA = Not Analyzed.

U = Not detected

B = Analyte is detected in an associated blank.

J = Result is an estimated value below the reporting limit.

M = Manually integrated compound.

Bold shaded values exceed their respective NYSDEC Class GA Standard or Guidance Value.

TABLE 3B POST-REMEDIATION GROUNDWATER SAMPLE DATA MW-1, MW-2, MW-3 AND MW-4 - INORGANIC PARAMETERS DATA I. W. INDUSTRIES, MELVILLE, NEW YORK

Well No.				MW-1					MW-2				MW-3							- ₹						
Sampling Date	3/22/01	2/01	3/30/04	3/23/05	3/8/06	/06	6/29/07	3/8/06	/06	6/29/07	3/22/01	2/01	3/8/06	06	6/29/07	3/22/01		3/27/02		+	3/30/04	+	⊥ ջո			NYSDEC GA
Sample Type	Whole	Filtered	Whole	Whole	Whole	Filtered	Whole	Whole	Filtered	Whole	Whole	Filtered	Whole	Filtered	Whole	Whole	Filtered	Whole	Filtered	Whole	Whole	Whole	Whole F	Filtered	Whole	Standards
Sampling Depth (ft)				52.85					52				49.2							58						
Metals in ug/l																										
Aluminum	976	9.9 B	786	192 B	169 B	С	C	332 B	С	C	1,760	48.3 B	132 B	C	C	2,010	27.1 B	911 J	С	739 NJ	624	347 B	U	С	C	
Arsenic	15.8	7.7 B	25.1 B	13.5 B	14.7 B	9.5 BJ	6.7 J	6.3 B	С	J. 0.6	18.1	С	28.6 B	13.4 BJ	12 J	6.5 B	U	C	C	С	U	U	u	C	C	25
Barium	67.2 B	22.1 B	76.4	27.3	17.3	8.1 J	9.8	92.5	72.1 J	13	164 B	12.5 B	53.6	36.2 J	64	275	159 B	222	183	179	236	192	99.9	71.0 J	110	1,000
Beryllium	0.20 B	C	C	C	c	С	C	С	С	C	0.34 B	С	С	С	C	C	U	_	С	c	С	С	c	_	C	
Cadmium	0.43 B	U	2.0 B	1.8 B	c	С	C	С	C	C	1.0 B	С	C	С	C	U	U	С	c	С	c	_	С	С	c	, on
Calcium	11,400	11,200	24,700	13,400	8,970	9,190 J	7,900	29,200	28,900 J	11,900	8,030	5,860	11,900	13,100 J	10,900	10.900	10,800	13,600	13,900	21,100	21,600	14800	12,200 1	12,300 J	10,600	
Chromium	2.8 B	U	2.7 B	1.8 B	2.3 B	1.8 BJ	2.0 J	С	c	C	7.8 B	1.8 B	1.9 B	2.3 B J	_	3.3 B	С	1.7 B	c	c	c	1.6 B	c	_	_	50
Cobalt	8.1 B	6.9 B	11.5	7.1 B	3.8 B	3.7 BJ	C	2.1 B	1.9 BJ	5.2 J	1.8 B	С	21.4	20.9 J	5.9 J	8.0 B	6.8 B	3.3 B	3.7 B	14.4	41.2	23.3	3.3 B	2.4 BJ	2.7 J	
Copper	30.5	n	84.8	13.1	21.3	5.0 BJ	11	11.3	10.4 J	15	43.7	6.9 B	65.6	24.1 J	15	10.7 B	С	4.6 B	6.3 B	2.4 B	5.5 B	6.0 B	c	5.4 BJ	4.3 J	200
Iron	38,000	33,000	65,900	72,300	70,200	J8,800 J	57,500	20,300	475 J	45,500	43,300	785	59,500	36,500 J	55,000	19,400	9,910	3,910	794	3,080	5,050	9,400	656	С	2,400	300
Lead	13.4	U	12.5	3.3 JB	3.2 B	U	C	4.7 B	U	U	8.39	17.3	4.4 B	U	С	8.3	c	C	c	С	c	٤	С	С	c	25
Magnesium	2,160 B	2,040 B	2,610	2,080	1,810	1,850 J	1,400	1,770	1,840 J	2,000	2,690 B	2,060 B	2,810	3,060 J	2,700	2,490 B	2,310 B	3,020	3,000	4,620	4,960	3610	3,050	3,010 J	2,800	
Manganese	822	853	1,080	892	831	745 J	530	328	187 J	470	248	8.3 B	1,380	1,200 J	550	1,110	1,140	1,580 J	1,850 J	4,680	5,730 J*	2,000	303	190 J	99	300
Mercury	C	U	C	LU	C	C	C	C	C	C	0.11 B	C	n	U	C	0.15 B	•	C	U	C	c	ñ	c	_	C	0.7
Nickel	6.5 B	3.7B	5.7 B	2.6 B	C	2.2 BJ	C	2.0 B	4.4 BJ	2.5 J	2.8 B	С	14.7	L 0.51	3.2 J	4.6 B	2.7 B	2.6 B	9.7 B	3.9 B	7.2 B	5.3 B	3.0 BJ	4.4 BJ	C	100
Potassium	5,120 J	5,350 J	12,700 J	4,050	2,110	2,090 J	1,500	23,700	22,700 J	1,900	1,960 JB	1,670 JB	3,930	4,170 J	2,500	3,010 JB	2,800 JB	3,730	3,550	4,410 NJ	5,710 J	4,870	4,540	4,210 J	2,400	
Selenium	C	C	ΓU	С	C	C	C	C	C	C	4.4 B	3.4 B	C	U	U	U	U	С	_	С	ΓΩ	С	С	С	C	10
Sodium	14,600	15,300	50,100	19,200	10,700	21,600	11,600	119,000	123,000	10,800	8.610	8,630	19,200	32,600	17,400	12,900	13,800	16,100	16,600	16,700 E	25,000	24,100	22,800	32,600	17,500	20,000
Vanadium	4.7 B	0.44 B	5.0 B	2.1 B	2.4 B	C	2.2 J	4.5 B	c	1.3 J	14.1 B	0.61 B	2.5 B	U	1.1 J	8.9 B	U	3.5 B	С	3.1 B	2.1 B	С	_	_	c	,
Zinc	39.7	28	70.1	С	35.3 B	36.9 BJ	C	11.1 BJ	20.6 J	С	48.3	36.1	18.5 BJ	48.9 BJ	С	19.5 B	16.3 B	c	24.9 B	c	_	c	15.1 B	16.1 BJ	C	,

Notes:

Sample Depth refers to well depth.

ug/l = micrograms per liter.

U = Not Detected.

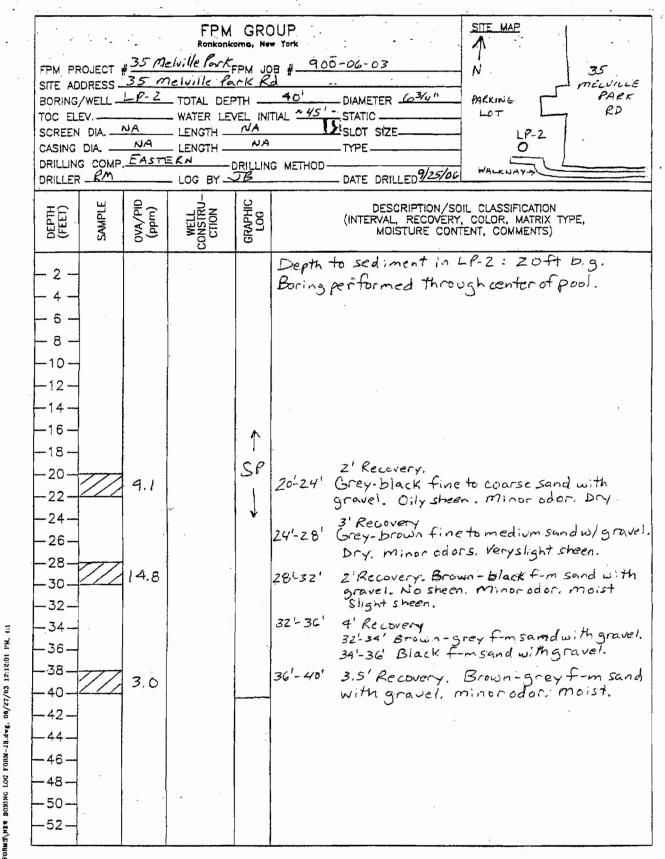
B = Reported value is less than the Contract Required Detection Limit but greater than the Instrument Detection Limit.

J = Estimated value.

Bold values exceed their respective NYSDEC Class GA Standard or Guidance Value.

*Laboratory data not valid.





BOXUNG LOG