March 29, 2016

Ms. Pamela Tames
Project Manager
USEPA, region 2
290 Broadway, 20th Floor
New York, NY 10007

RE: Localized Sediment Evaluation Report
Richardson Hill Road Landfill, Town of Sidney, New York

FILE: 3729/62470

Dear Ms. Tames:

On behalf of the Richardson Hill Road Landfill Site PRP group (Respondents), this letter presents the results of the localized sediment evaluation conducted at the Richardson Hill Road Landfill (RHRL) in Sidney Center, New York. This scope of this evaluation was provided in a Work Plan dated November 11, 2015, which was approved by United States Environmental Protection Agency (USEPA).

BACKGROUND

As outlined in the Work Plan, the sediment evaluation activities focused on two outlier areas where polychlorinated biphenyls (PCBs) were detected as identified in the NYSDEC report entitled *Richardson Hill Road Landfill: 2012 Contaminant Trackdown Study Field Investigation Report* dated August 2014 as follows:

- The surface water column sample, PISCES 6, collected from the former stormwater pond located south of the current groundwater collection trench contained PCBs at a concentration which was higher than the rest of the samples from the study. The mean PCB concentration detected in the PISCES 6 sample was 624 nanograms (ng), which was approximately three times the highest concentration observed in the other samples collected during the study.
- The concentration of PCBs in sample SED2, located northeast of South Pond was 2.6 mg/kg. This concentration is above the sediment cleanup goal of 1 mg/kg identified in the Record of Decision for the site.

Based on these findings the Work Plan identified the following objectives.

- Assess whether the sediments within the stormwater pond are contributing to the elevated concentration of PCBs identified in the PISCES 6 sample.
- Evaluate the horizontal and vertical extent of PCBs above 1 mg/kg in the vicinity of SED-2.

The following documents the field sampling and analysis procedures and presents conclusions based on the results of the analyses.

SAMPLE COLLECTION AND ANALYSIS

OBG personnel collected samples on November 30 and December 1, 2015. Samples were collected manually in accordance with the Work Plan. The following summarizes the sampling methods and field observations at each location.

PISCES 6 AREA

The stormwater retention basin was constructed as part of the Stormwater Pollution Prevention Plan (SWPPP) developed during the landfill capping program. Upon completion of the remedial program, the pond was left in place at the request of both state and federal wildlife experts due to the establishment of flora and fauna colonies. It currently receives runoff from the drainage swales adjacent to the landfill cap and piping that run along Richardson Hill Road. The location of the stormwater basin is shown on Figure 1. The stormwater basin is approximately 140 ft long by 50 ft wide. As shown on Figure 2, the stormwater basin is divided into two sections by a shallow soil berm on the west end. The berm is closest to the western end where the stormwater inflow enters the pond.

The Work Plan identified collection of six samples of sediment from this pond to assess whether the sediment may be contributing to the elevated PCB concentration in the PISCES 6 sample. Samples were to be collected from 0 to 6 inches, 6 inches to 12 inches, and 12 to 24 inches depending on the thickness of the sediment present. Sample locations within the stormwater basin were accessed using a combination of a boat and wading. The water depth during sampling was noted to be between 2 and 4 ft depending on location. Field observations during the sampling efforts revealed that less than 6 inches of material was present on top of a substrate of cobble-size rip rap. Therefore, a single sample was collected at each location using a dedicated lexan tube. Sample identification designations are SWRB-SED-A through SWRB-SED-F. The sample location was documented using a hand-held Trimble® GPS. Sample locations are provided on Figure 2.

SED-2 AREA

The SED-2 sample was collected from a small channel located within the wetland area on the northeast side of South Pond. As outlined in the Work Plan, the approach to evaluating the horizontal and vertical extent of PCBs above 1 mg/kg in the SED-2 area consisted of collection of sediment samples from locations within and outside of the channel in which the SED-2 sample was located. Specifically, nine sampling locations were arranged in a 3 by 3 grid pattern. The distance between each grid node was approximately 20 ft. In addition three samples were collected from within the pond to assess whether that had be re-deposition of PCBs from the SED-2 area. Sample locations are illustrated on Figure 3.

Prior to collection of the samples, the sampling crew established the sample locations using a handheld GPS and a tape measure. Locations were marked with wooden stakes. Samples were then collected from each location within the wetland using a hand auger. Consistent with the Work Plan, the hand auger was decontaminated between each sample using alconox® and water. Water generated was contained in a bucket that was transferred to the on-site treatment plant for disposal. Samples from the three locations within South Pond were collected using disposable lexan® tubes.

As outlined in the Work Plan, samples from the wetland area surrounding SED-2 were collected to 24 inches below grade at intervals of 0 to 6 inches, 6 to 12 inches and 12 to 24 inches. The location identification for these samples are SED_2A through SED-2I. Within South Pond, the soft sediment, which was between 6 and 10 inches thick, was collected. Samples were collected the upper 0 to 6 inches as outlined in the Work Plan. These samples were labeled SP-SED-A through SP-SED-C.

Sample Handling and Analysis

Once material from the targeted sample interval was collected, the sample was homogenized by mixing in a disposable aluminum pan prior to placement in the laboratory-supplied sample container. Samples were then placed into a cooler with ice and delivered to the TestAmerica service center in Syracuse, NY.

The samples were analyzed for PCBs in accordance with USEPA Method 8082. In the SED-2 area samples from the 0 to 6 inch and 6 to 12 inch depth intervals were analyzed first with the deeper 12 to 24 inch interval held pending results. As will be discussed further below, the deeper sample from the SED-2E location was subsequently analyzed.

The laboratory provided a data report in accordance with NYS ASP Category be requirements. This analytical data package was subsequently reviewed by Data Validation Services and a Data Usability Summary Report (DUSR) was prepared. A copy of the DUSR is provided as Attachment 1.

RESULTS

The results of the analyses are summarized on Table 1. Figures 2 and 3 present the data for each area with respect to location. The following presents a discussion of the results.

PISCES 6 AREA

As discussed above, the sediment depth encountered within the stormwater basin where the PISCES 6 sample was located was on the order of 3 to 4 inches thick and was underlain by cobble-sized rip rap used to protect the area from erosion during use as a stormwater retention basin as part of the construction activities. Results of the sediment analysis reveals that concentrations of PCBs were non-detect (detection limit range of 0.25 to 0.41 mg/kg). The PCB concentration of SWRB-SED-A was 0.49 mg/kg which is less than the cleanup goal of 1 mg/kg. This sample was collected from the west end of the pond in the section where PISCES 6 was located.

SED-2 AREA

Field observations during sampling in this area indicated that, with one exception, the soft sediments in the area are generally 6 to 12 inches deep and underlain by a harder layer of clayey silt. At the SED-2B location the soft sediments were deeper and the harder silty clay unit was not encountered at the maximum sampling depth of 2 ft.

As shown on Table 1, PCBs were not detected in the sediment samples SP-SED-A, SP-SED-B and SP-SED-C collected from South Pond. Within the wetland area surrounding the SED-2 samples concentrations ranged from non-detect to an estimated value of 1.7 mg/kg. PCBs were not detected in either sample from the SED-2A location which was located near the original SED-2. As depicted on Table 1 and Figure 3, only the sample SED-2E contained PCB concentrations greater than 1 mg/kg. Specifically the 0 to 6 inch sample contained PCBs at 1.3 mg/kg and one of the duplicate samples collected from the 6 to 12 inch depth at this location contained PCBs at 1.7 mg/kg. Of note, the PCB concentration in the other duplicate sample collected from the 6-12 inch depth was only 0.65 mg/kg. Upon review of the data, the laboratory was instructed to analyze the 12 to 24 inch sample from the SED-2E location. The PCB concentration of this was 0.26 mg/kg (Table 1).

The data suggest that PCBs are sporadically detected the shallow soil in the wetland in the vicinity of SED-2. The fact that the PCB concentration in the duplicate sample associated with SED-2E at 6 to 12 inches was not comparable to the parent sample, and that PCBs in the sample (SED-2A) that was collected to confirm the SED-2 sample were non-detect further supports that there is not a contiguous mass of PCBs remaining but rather isolated residual PCBs in the sediment northeast of South Pond. These findings suggest that the overall mass of PCBs in the sediment in the sampling area is minimal. Additionally, PCB concentrations in the sediment samples collected within the South Pond near the northeast bank were less than 1 mg/kg suggesting that the potential for PCB migration from the SED-2 sampling area is minimal.

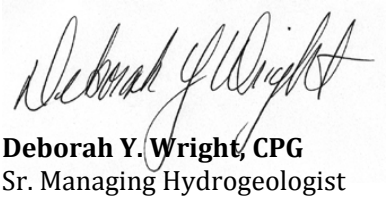
RECOMMENDATIONS

PCBs were not detected in five of the six samples collected from the stormwater retention basin. The single detection of PCBs was below 1 mg/kg, therefore no additional evaluation is recommended for this area.

Although PCBs were detected marginally above 1 mg/kg in the original SED-2 sample and samples at the SED-2E location, the historic and more recent sediment data suggest that these exceedances are relatively low in concentration, isolated in nature, and do not appear to be migrating to South Pond. This suggests that the potential for exposure and/or future migration is low.

Should you have any questions pertaining to this information or the project in general please contact Joseph Bianchi of Amphenol at 607-563-5940 or jbian@amphenol-aao.com.

Very truly yours,
O'BRIEN & GERE ENGINEERS, INC.



Deborah Y. Wright, CPG
Sr. Managing Hydrogeologist

CC: Joseph Bianchi - Amphenol
Samuel Waldo – Amphenol
Mark Sweitzer – Honeywell

Table 1

Sample Result Summary
Richardson Hil Road Landfill
Sidney Center, NY

Stormwater Retention Basin (PISCES 6)

Analyte	CAS #	Location ID / Depth / Sample Date	SWRB-SED-A 0 to 6 inches 11/30/2015	SWRB-SED-B 0 to 6 inches 11/30/2015	SWRB-SED-C 0 to 6 inches 11/30/2015	SWRB-SED-D 0 to 6 inches 11/30/2015	SWRB-SED-E 0 to 6 inches 11/30/2015	SWRB-SED-F 0 to 6 inches 11/30/2015	FD-1-113015 0 to 6 inches 11/30/2015
PCB-1016	12674-11-2		0.70 U	0.25 U	0.25 U	0.27 U	0.33 U	0.41 U	0.35 U
PCB-1221	11104-28-2		0.70 U	0.25 U	0.25 U	0.27 U	0.33 U	0.41 U	0.35 U
PCB-1232	11141-16-5		0.70 U	0.25 U	0.25 U	0.27 U	0.33 U	0.41 U	0.35 U
PCB-1242	53469-21-9		0.70 U	0.25 U	0.25 U	0.27 U	0.33 U	0.41 U	0.35 U
PCB-1248	12672-29-6		0.49 J	0.25 U	0.25 U	0.27 U	0.33 U	0.41 U	0.35 U
PCB-1254	11097-69-1		0.70 U	0.25 U	0.25 U	0.27 U	0.33 U	0.41 U	0.35 U
PCB-1260	11096-82-5		0.70 U	0.25 U	0.25 U	0.27 U	0.33 U	0.41 U	0.35 U

SED-2 Area

Analyte	CAS #	Location ID / Depth / Sample Date	SP-SED-A 0 to 6 inches 12/1/2015	SP-SED-B 0 to 6 inches 12/1/2015	SP-SED-C 0 to 6 inches 12/1/2015	SED-2A 0 to 6 inches 12/1/2015	SED-2A 6 to 12 inches 12/1/2015	SED-2B 0 to 6 inches 12/1/2015	SED-2B 12/1/2015 12/1/2015	SED-2C 0 to 6 inches 12/1/2015	SED-2C 6 to 12 inches 12/1/2015	SED-2D 0 to 6 inches 12/1/2015	SED-2D 6 to 12 inches 12/1/2015	SED-2E 0 to 6 inches 12/1/2015
PCB-1016	12674-11-2		0.30 U	0.37 U	0.37UJ	0.31 U	0.29 U	0.58 UJ	0.61 U	0.66 UJ	0.79 UJ	0.70 U	0.65 UJ	0.70 U
PCB-1221	11104-28-2		0.30 U	0.37 U	0.37UJ	0.31 U	0.29 U	0.58 UJ	0.61 U	0.66 UJ	0.79 UJ	0.70 U	0.65 UJ	0.70 U
PCB-1232	11141-16-5		0.30 U	0.37 U	0.37UJ	0.31 U	0.29 U	0.58 UJ	0.61 U	0.66 UJ	0.79 UJ	0.70 U	0.65 UJ	0.70 U
PCB-1242	53469-21-9		0.30 U	0.37 U	0.37UJ	0.31 U	0.29 U	0.58 UJ	0.61 U	0.66 UJ	0.79 UJ	0.70 U	0.65 UJ	0.70 U
PCB-1248	12672-29-6		0.59	0.37 U	0.57J-	0.31 U	0.29 U	0.58 UJ	0.61 U	0.25 J-	0.79 UJ	0.70 U	0.65 UJ	**1.3**
PCB-1254	11097-69-1		0.30 U	0.37 U	0.17J-	0.31 U	0.29 U	0.58 UJ	0.61 U	0.66 UJ	0.79 UJ	0.70 U	0.65 UJ	0.70 U
PCB-1260	11096-82-5		0.30 U	0.37 U	0.37UJ	0.31 U	0.29 U	0.58 UJ	0.61 U	0.66 UJ	0.79 UJ	0.70 U	0.65 UJ	0.70 U

SED-2 Area

Analyte	CAS #	Location ID / Depth / Sample Date	SED-2E 6 to 12 inches 12/1/2015	SED-2E 12 to 24 inches 12/1/2015	SED-2F 0 to 6 inches 12/1/2015	SED-2F 6 to 12 inches 12/1/2015	SED-2G 0 to 6 inches 12/1/2015	SED-2G 6 to 12 inches 12/1/2015	SED-2H 0 to 6 inches 12/1/2015	SED-2H 6 to 12 inches 12/1/2015	SED-2I 0 to 6 inches 12/1/2015	SED-2I 6 to 12 inches 12/1/2015	FD-2-120115 0 to 6 inches 12/1/2015	FD-3-120115 6 to 12 inches 12/1/2015
PCB-1016	12674-11-2		0.65 UJ	0.43U	0.33 U	0.26 U	0.54 U	0.25 U	0.57 U	0.25 U	0.26 U	0.25 U	0.36 UJ	0.73 UJ
PCB-1221	11104-28-2		0.65 UJ	0.43U	0.33 U	0.26 U	0.54 U	0.25 U	0.57 U	0.25 U	0.26 U	0.25 U	0.36 UJ	0.73 UJ
PCB-1232	11141-16-5		0.65 UJ	0.43U	0.33 U	0.26 U	0.54 U	0.25 U	0.57 U	0.25 U	0.26 U	0.25 U	0.36 UJ	0.73 UJ
PCB-1242	53469-21-9		0.65 UJ	0.43U	0.33 U	0.26 U	0.54 U	0.25 U	0.57 U	0.25 U	0.26 U	0.25 U	0.36 UJ	0.73 UJ
PCB-1248	12672-29-6		0.65J-	0.26J	0.16 J	0.26 U	0.29 J	0.25 U	0.44 J	0.25 U	0.14 J	0.14 J	0.18 J-	**1.7J**
PCB-1254	11097-69-1		0.65 UJ	0.43U	0.33 U	0.26 U	0.54 U	0.25 U	0.57 U	0.25 U	0.26 U	0.25 U	0.36 UJ	0.73 UJ
PCB-1260	11096-82-5		0.65 UJ	0.43U	0.33 U	0.26 U	0.54 U	0.25 U	0.57 U	0.25 U	0.26 U	0.25 U	0.36 UJ	0.73 UJ

Notes: Results reported in mg/kg (parts per million).
FD-2-120115 is the field duplicate for sample SED-2G-0-6-120115.
FD-3-120115 is the field duplicate for sample SED-2E-6-12-120115.
J -Value estimated.
J- - Value estimated and biased low.
UJ - Constituent not detected. Detection limit estimated.

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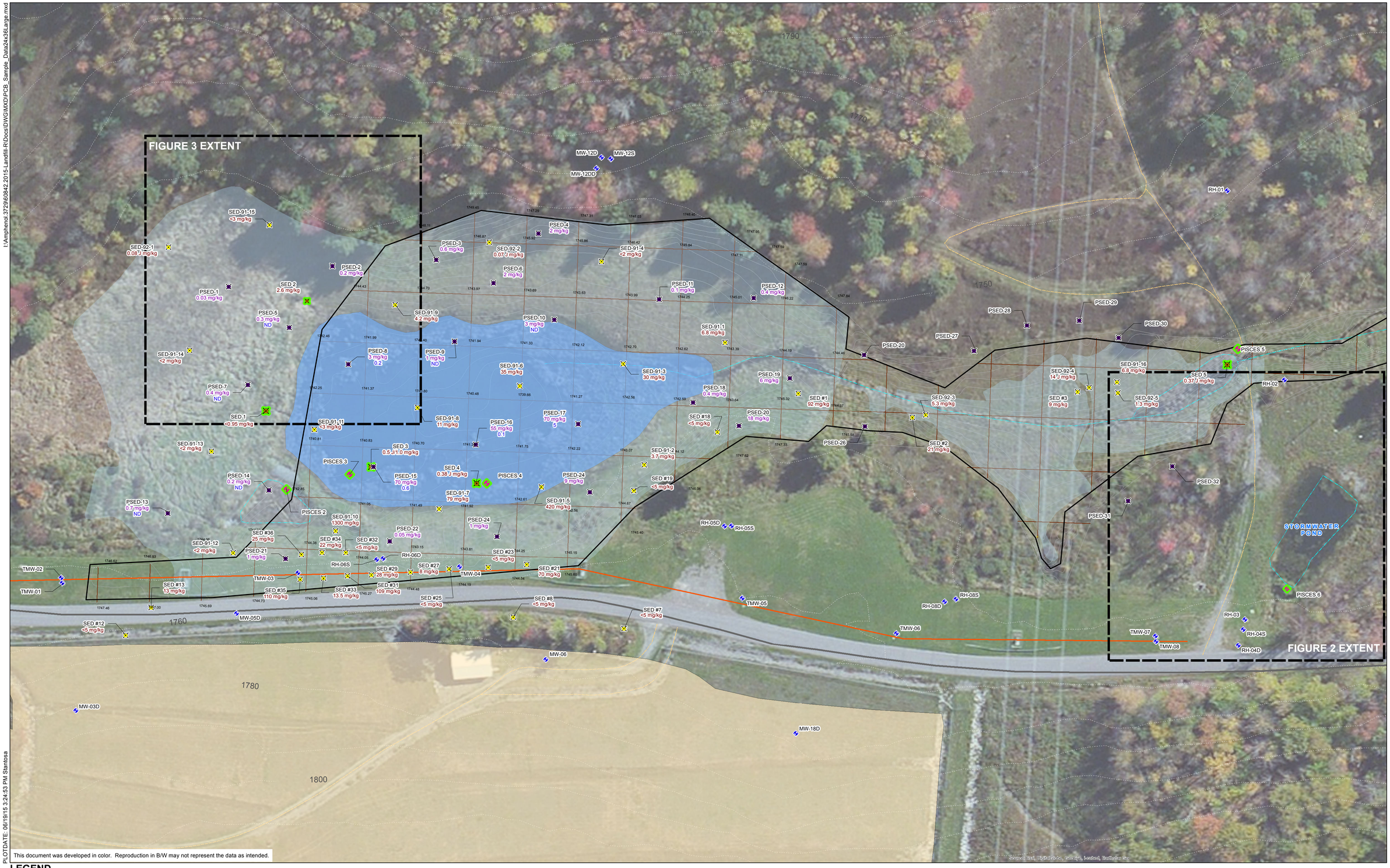

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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics

LEGEND

- MONITORING WELL
- PISCES SAMPLE *(DEC 2012)*
- SEDIMENT SAMPLE *(DEC 2012)*
- SEDIMENT SAMPLE *(PRE-DESIGN 2000)*
- SEDIMENT SAMPLE *(RI REPORT)*
- EXCAVATION LIMIT
- CREEK EXCAVATION CONTOUR
- UNPAVED ROAD
- TRENCH LINE
- CONTOUR
- RICHARDSON HILL ROAD
- CURRENT POND LIMIT *(APPROXIMATE)*
- FORMER WATER LIMIT
- DISPOSAL AREA
- CAPPED LANDFILL

NOTE:
SED-91-6 (LOC ID)
0.01 mg/kg (UNITS)
35 mg/kg
ND
PCB CONCENTRATION UNKNOWN DEPTH
PCB CONCENTRATION 0 - 1 FT
PCB CONCENTRATION 1- 2 FT

N

0 20 40 80 120 160
Feet

RICHARDSON HILL
ROAD LANDFILL
SIDNEY CENTER, NEW YORK

PCB SAMPLE LOCATION DATA

FILE NO.
3729.51896
DATE
JUNE 2015

FIGURE 1

O'BRIEN & GERE

SWRB-SED-A	Depth	11/30/2015
PCB 1248 (mg/kg)	0-6"	0.49 J

N

LEGEND

- SEDIMENT SAMPLE LOCATION
- MONITORING WELL
- PISCES SAMPLE *(DEC 2012)*
- APPROXIMATE LIMIT OF STORMWATER RETENTION BASIN
- APPROXIMATE LIMIT OF BERM

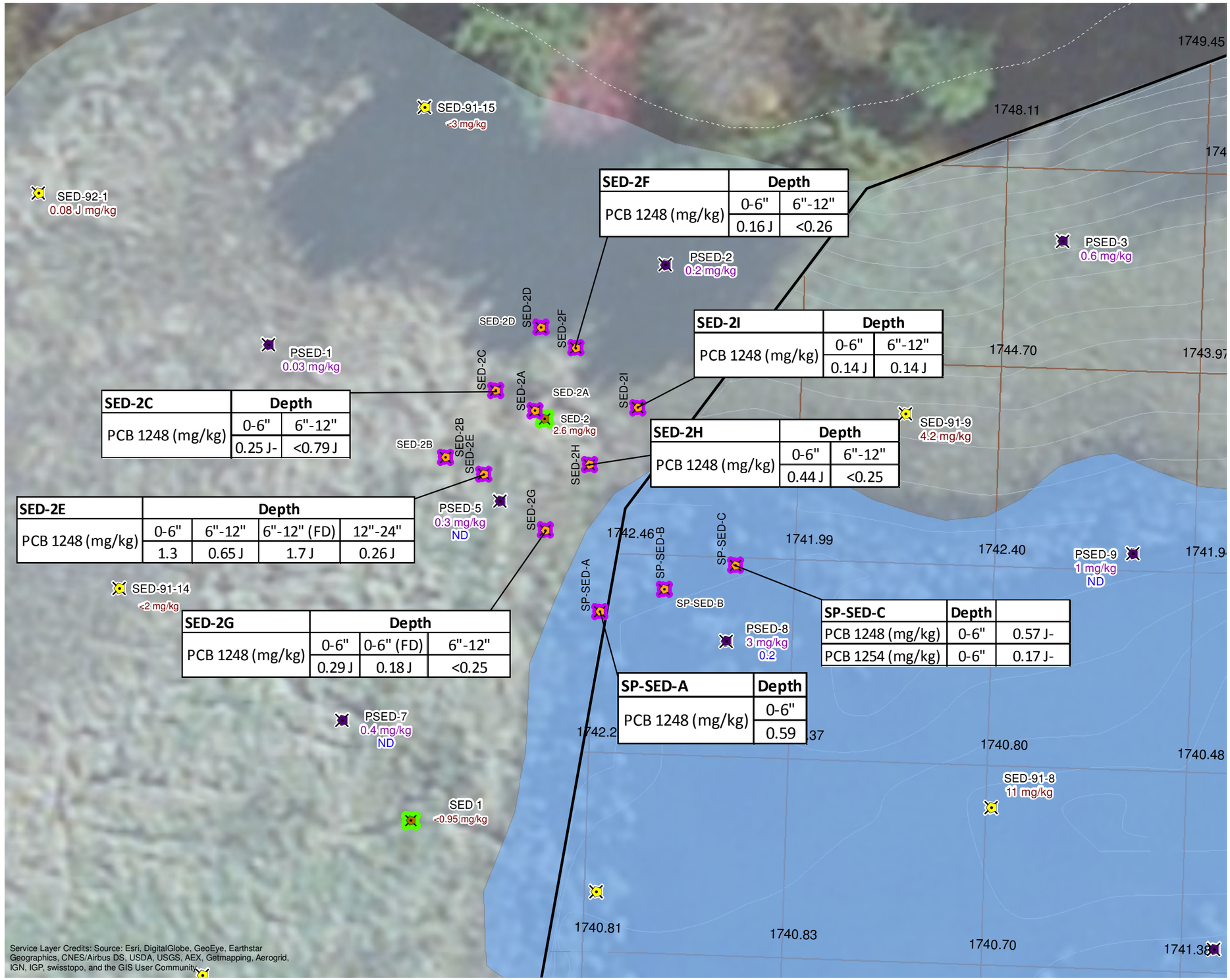
RICHARDSON HILL
ROAD LANDFILL
SIDNEY CENTER, NEW YORK

STORMWATER RETENTION BASIN DETECTED PCBs (mg/kg) IN BASIN SEDIMENT

0 10 20 40
Feet

MARCH 2016
3729.62470

O'BRIEN & GERE ENGINEERS, INC.



SED-2F	Depth	
PCB 1248 (mg/kg)	0-6"	6"-12"
	0.16 J	<0.26

SED-2I	Depth	
PCB 1248 (mg/kg)	0-6"	6"-12"
	0.14 J	0.14 J

SED-2C	Depth	
PCB 1248 (mg/kg)	0-6"	6"-12"
	0.25 J-	<0.79 J

SED-2H	Depth	
PCB 1248 (mg/kg)	0-6"	6"-12"
	0.44 J	<0.25

SED-2E	Depth			
PCB 1248 (mg/kg)	0-6"	6"-12"	6"-12" (FD)	12"-24"
	1.3	0.65 J	1.7 J	0.26 J

SED-2G	Depth		
PCB 1248 (mg/kg)	0-6"	0-6" (FD)	6"-12"
	0.29 J	0.18 J	<0.25

SP-SED-A	Depth
PCB 1248 (mg/kg)	0-6"
	0.59

SP-SED-C	Depth	
PCB 1248 (mg/kg)	0-6"	0.57 J-
PCB 1254 (mg/kg)	0-6"	0.17 J-

N

LEGEND

- SEDIMENT SAMPLE LOCATION
- MONITORING WELL
- PISCES SAMPLE *(DEC 2012)*
- SEDIMENT SAMPLE *(DEC 2012)*
- SEDIMENT SAMPLE *(PRE-DESIGN 2000)*
- SEDIMENT SAMPLE *(RI REPORT)*
- EXCAVATION LIMIT
- CURRENT POND LIMIT *(APPROXIMATE)*

RICHARDSON HILL
ROAD LANDFILL
SIDNEY CENTER, NEW YORK

SED-2 AREA / SOUTH POND DETECTED PCBs (mg/kg) IN SEDIMENT

0 12.5 25 50
Feet

MARCH 2016
3729.62470

O'BRIEN & GERE ENGINEERS, INC.

Data Usability Summary Report (DUSR)

Data Validation Services

120 Cobble Creek Road P.O. Box 208
North Creek, NY 12853

Phone 518-251-4429
harry@frontiernet.net

January 18, 2016

David Carnevale
O'Brien & Gere Engineers
333 West Washington St.
Syracuse, NY 13221

RE: Validation of the Data Packages for the Richardson Hill Road Landfill (RHRL) Site Sediments
TAL SDG No. 480-91992-1

Dear Mr. Carnevale:

Review has been completed for the data package generated by TestAMerica Laboratories that pertains to samples collected 11/30/15 and 12/01/15 at the RHRL site. Thirty seven sediment samples and three field duplicates were analyzed for TCL PCBs by EPA 8082A. An equipment blank and sample matrix spikes were also processed.

Data validation was performed with guidance from the USEPA CLP National Functional Guidelines for Organic Data Review and the USEPA Region II validation SOPs, with consideration for specific method requirements. The following items were reviewed:

* Data Completeness
* Custody Documentation
* Holding Times
* Surrogate Standard Recoveries
* Matrix Spike Recoveries/Duplicate Correlations
* Field Duplicate Correlations
* Preparation/Equipment Blanks
* Laboratory Control Samples (LCSs)
* Calibration Standards
* Method Detection Limits (MDLs)
* Method Compliance
* Sample Result Verification

Those items showing deficiencies are discussed in the following sections of this report. All others were found to be acceptable as outlined in the above-mentioned validation procedures, and as applicable for the methodology. Unless noted specifically in the following text, reported results are substantiated by the raw data, and generated in compliance with protocol requirements.

In summary, sample results are usable either as reported, or with minor qualification or edit.

Included in this submission are the list of sample identifications, validation qualifier definitions, and the client results table with the qualifiers recommended within this report applied in red.

PCBs Analyses by EPA 8082A

Samples SP-SED-C-0-6-120115, SED-2E-6-12-120115, SED-2D-6-12-120115, SED-2C-0-6-1201150, SED-2C-6-12-120115, SED-2B-0-6-1201150, and FD-3-120115 produced low surrogate standard DCB recoveries on both analytical columns. The results for those samples are therefore qualified as estimated in value, with a possible low bias.

Results for SED-2C-6-12-120115 and FD-3-120115 are qualified as estimated due to low solids content (below 30%). The degree and direction of bias cannot be predicted.

Due to an elevated dual column quantitative correlation, the detected Aroclor 1248 result in SED-2I-0-6-120115 is qualified as estimated.

Holding times were met. Method blanks showed no contamination. Calibration standards show acceptable responses.

The matrix spike evaluations of Aroclors 1016/1260 on SWRB-SED-A-0-6-113015, SED-2I-6-12-120115, and SED-2E-0-6-120115 show acceptable recoveries and duplicate correlations.

The field duplicate evaluations were performed on SED-2G-0-6-120115, SED-2E-6-12-120115, and SWRB-2F-0-6-113015. The correlations are within the validation action limits.

Please do not hesitate to contact me if questions or comments arise during your review of this report.

Very truly yours,

Judy Harry

VALIDATION DATA QUALIFIER DEFINITIONS

U	The analyte was analyzed for, but was not detected above the level of the associated reported quantitation limit.
J	The analyte was positively identified; the associated numerical value is an approximate concentration of the analyte in the sample.
J-	The analyte was positively identified; the associated numerical value is an estimated quantity that may be biased low.
J+	The analyte was positively identified; the associated numerical value is an estimated quantity that may be biased high.
UJ	The analyte was analyzed for, but was not detected. The associated reported quantitation limit is approximate and may be inaccurate or imprecise.
NJ	The detection is tentative in identification and estimated in value. Although there is presumptive evidence of the analyte, the result should be used with caution as a potential false positive and/or elevated quantitative value.
R	The data are unusable. The sample results are rejected due to serious deficiencies in meeting Quality Control limits. The analyte may or may not be present.
EMPC	The results do not meet all criteria for a confirmed identification. The quantitative value represents the Estimated Maximum Possible Concentration of the analyte in the sample.

CLIENT and LABORATORY SAMPLE IDs

SAMPLE SUMMARY

Client: Honeywell International Inc

Job Number: 480-91992-1

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received
480-91992-1	SWRB-SED-C-0-6-113015	Solid	11/30/2015 1250	12/03/2015 0125
480-91992-2	SWRB-SED-B-0-6-113015	Solid	11/30/2015 1345	12/03/2015 0125
480-91992-3	SWRB-SED-A-0-6-113015	Solid	11/30/2015 1406	12/03/2015 0125
480-91992-3MS	SWRB-SED-A-0-6-113015	Solid	11/30/2015 1406	12/03/2015 0125
480-91992-3MSD	SWRB-SED-A-0-6-113015	Solid	11/30/2015 1406	12/03/2015 0125
480-91992-4	SWRB-SED-F-0-6-113015	Solid	11/30/2015 1415	12/03/2015 0125
480-91992-5	SWRB-SED-E-0-6-113015	Solid	11/30/2015 1425	12/03/2015 0125
480-91992-6	SWRB-SED-D-0-6-113015	Solid	11/30/2015 1435	12/03/2015 0125
480-91992-7	FD-1-113015	Solid	11/30/2015 0000	12/03/2015 0125
480-91992-8	SP-SED-A-0-6-120115	Solid	12/01/2015 0859	12/03/2015 0125
480-91992-9	SP-SED-B-0-6-120115	Solid	12/01/2015 0908	12/03/2015 0125
480-91992-10	SP-SED-C-0-6-120115	Solid	12/01/2015 0912	12/03/2015 0125
480-91992-11	SED-2I-0-6-120115	Solid	12/01/2015 0940	12/03/2015 0125
480-91992-12	SED-2I-6-12-120115	Solid	12/01/2015 0945	12/03/2015 0125
480-91992-12MS	SED-2I-6-12-120115	Solid	12/01/2015 0945	12/03/2015 0125
480-91992-12MSD	SED-2I-6-12-120115	Solid	12/01/2015 0945	12/03/2015 0125
480-91992-14	SED-2H-0-6-120115	Solid	12/01/2015 1005	12/03/2015 0125
480-91992-15	SED-2H-6-12-120115	Solid	12/01/2015 1008	12/03/2015 0125
480-91992-17	SED-2G-0-6-120115	Solid	12/01/2015 1015	12/03/2015 0125
480-91992-18	SED-2G-6-12-120115	Solid	12/01/2015 1016	12/03/2015 0125
480-91992-20	SED-2E-0-6-120115	Solid	12/01/2015 1030	12/03/2015 0125
480-91992-20MS	SED-2E-0-6-120115 MS	Solid	12/01/2015 1030	12/03/2015 0125
480-91992-20MSD	SED-2E-0-6-120115 MSD	Solid	12/01/2015 1030	12/03/2015 0125
480-91992-21	SED-2E-6-12-120115	Solid	12/01/2015 1033	12/03/2015 0125
480-91992-23	SED-2A-0-6-1201150	Solid	12/01/2015 1110	12/03/2015 0125
480-91992-24	SED-2A-6-12-120115	Solid	12/01/2015 1114	12/03/2015 0125
480-91992-26	SED-2F-0-6-1201150	Solid	12/01/2015 1130	12/03/2015 0125
480-91992-27	SED-2F-6-12-120115	Solid	12/01/2015 1133	12/03/2015 0125
480-91992-29	SED-2D-0-6-1201150	Solid	12/01/2015 1142	12/03/2015 0125
480-91992-30	SED-2D-6-12-120115	Solid	12/01/2015 1146	12/03/2015 0125
480-91992-32	SED-2C-0-6-1201150	Solid	12/01/2015 1155	12/03/2015 0125
480-91992-33	SED-2C-6-12-120115	Solid	12/01/2015 1158	12/03/2015 0125
480-91992-35	SED-2B-0-6-1201150	Solid	12/01/2015 1210	12/03/2015 0125
480-91992-36	SED-2B-6-12-120115	Solid	12/01/2015 1214	12/03/2015 0125
480-91992-38	FD-2-120115	Solid	12/01/2015 0000	12/03/2015 0125
480-91992-39	FD-3-120115	Solid	12/01/2015 0000	12/03/2015 0125
480-91992-41EB	EB-1-120115	Water	12/01/2015 0000	12/03/2015 0125

Data Validation Services

120 Cobble Creek Road P.O. Box 208
North Creek, NY 12853

Phone 518-251-4429
harry@frontiernet.net

January 30, 2016

David Carnevale
O'Brien & Gere Engineers
333 West Washington St.
Syracuse, NY 13221

RE: Validation of the Data Packages for the Richardson Hill Road Landfill (RHRL) Site Sediments
TAL SDG No. 480-91992-2

Dear Mr. Carnevale:

Review has been completed for the data package generated by TestAmerica Laboratories that pertains to a sediment sample collected 12/01/15 at the RHRL site. The sample was analyzed for TCL PCBs by EPA 8082A.

Data validation was performed with guidance from the USEPA CLP National Functional Guidelines for Organic Data Review and the USEPA Region II validation SOPs, with consideration for specific method requirements. The following items were reviewed:

* Data Completeness
* Custody Documentation
* Holding Times
* Surrogate Standard Recoveries
* Preparation Blank
* Laboratory Control Sample (LCS)
* Calibration Standards
* Method Detection Limits (MDLs)
* Method Compliance
* Sample Result Verification

Those items showing deficiencies are discussed in the following sections of this report. All others were found to be acceptable as outlined in the above-mentioned validation procedures, and as applicable for the methodology. Unless noted specifically in the following text, reported results are substantiated by the raw data, and generated in compliance with protocol requirements.

In summary, the sample result is usable as reported.

Included in this submission is the client results table.

PCBs Analyses by EPA 8082A

Holding times were met. Surrogate recoveries are within recommended ranges. The method blank shows no contamination. Calibration standards show acceptable responses.

Associated matrix spike and field duplicate recovery and correlation evaluations have been reported in a separate DUSR, and show good accuracy and precision.

Please do not hesitate to contact me if questions or comments arise during your review of this report.

Very truly yours,

Judy Harry

CLIENT and LABORATORY SAMPLE IDs

SAMPLE SUMMARY

Client: Honeywell International Inc

Job Number: 480-91992-2

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received
480-91992-22	SED-2E-12-24-120115	Solid	12/01/2015 1036	12/03/2015 0125