

ROUX ASSOCIATES INC



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July 19, 2002

Mr. Rudolph H. Trinks
Ecology and Safety Department Remediation Team
BASF Corporation
3000 Continental Drive North
Mount Olive, New Jersey 07828-1234

Re: Lagoon Soil Characterization Sampling
BASF Corporation, Rensselaer Facility
Order on Consent, Index #A4-0345-96-7



Dear Mr. Trinks:

On behalf of BASF Corporation (BASF), Roux Associates, Inc. (Roux Associates) has completed a Supplemental Pre-Design Investigation (Supplemental PDI) in the Lagoon Area at the BASF facility in Rensselaer, New York (Site). The objective of the Supplemental PDI was to satisfy the New York State Department of Environmental Conservation (NYSDEC) requirement for pre-design soil boring samples in the Lagoon Area as stated in an April 29, 2002 letter to BASF. The soil samples were to be collected to determine the potential contamination left beyond the excavation sheet piling at Area of Concern 4A (Area-4A). The Supplemental PDI soil sampling program was performed on June 4, 2002 in accordance with the May 20, 2002 Lagoon Soil Characterization Sampling proposal.

Arsenic concentrations in the excavation area in Area-4A were previously characterized by soil samples collected from six soil borings completed during the Additional Remedial Investigation Activities (Additional RI Activities) in February and March 2001 and the Pre-Design Investigation (PDI) performed in October 2001. Based on these data, removal of some arsenic contaminated soils has been proposed. Temporary sheeting will be required on the lagoon side (i.e., west side) of the excavation. To determine that the proposed sheeting location between the area of excavation and the north lagoon will encompass all soil with arsenic concentrations that require removal, additional soil samples were collected. Three of the locations for the soil borings were selected to be outside of the western perimeter of the proposed limits of excavation of Area-4A as shown in Figure 3 of the January 16, 2002 Soil IRM Plan. Additional soil samples were obtained from borings completed just inside the perimeter of Area-4A along the northern perimeter and along the eastern perimeter adjacent to Riverside Avenue. The locations of new and previous soil borings are shown in attached Plate 1.

Methods

Eight soil borings (LG-SB-140 to LG-SB-147) were advanced along the sheeting limits of Area-4A (Plate 1). All soil borings were advanced using a Geoprobe™ direct push sampler in four-foot intervals from ground surface to the proposed sample interval depth. Soil boring logs depicting the lithology of each soil boring are attached. One soil sample was collected from each soil boring from the depth interval that corresponded to the depth interval exhibiting the highest arsenic concentration in the closest Additional RI Activities or PDI soil boring. Soils from each sample interval were homogenized and placed into sample containers for delivery to Severn Trent Laboratories of Shelton, Connecticut. All soil samples were analyzed for total arsenic. Following review of the analytical results of these soil samples, two samples (LG-SB-142 and LG-SB-147) were analyzed for arsenic using the toxicity characteristic leaching procedure (TCLP).

Results

A description of the Supplemental PDI soil quality results is provided below. These results, as well as soil quality results for soil samples collected in Area-4A during the Additional RI Activities and the PDI are presented in Table 1 and on Plate 1.

In general, the soils sampled consisted of a moist, brown fine to coarse sand with minor amounts of silt, clay and gravel. Fill materials, including coal, brick, ash, and cinders were also observed in several borings. In addition, soil samples collected from Soil Borings LG-SB-143, LG-SB-144 and LG-SB-147 contained a purple-stained sand or silt. These three soil samples contained the three highest concentrations of arsenic detected in the Supplemental PDI soil samples. Groundwater was not encountered in any soil boring. A photoionization detector was used to screen all soils characterized during this investigation. All readings were relatively low with the highest reading being 12 parts per million in LG-SB-144.

Soil Quality Adjacent to the North Lagoon

Three soil borings (LG-SB-140, LG-SB-141 and LG-SB-142) were completed between the proposed limits of Area-4A and the North Lagoon. The maximum arsenic concentration in these three borings was detected in the sample from LG-SB-142 (1,080 mg/kg). TCLP arsenic in the same sample was 1.07 mg/L. These total arsenic and TCLP concentrations are below the cleanup objective established for Area-4A.

Soil Quality Along the Northern Perimeter of Area-4A

Two soil borings (LG-SB-146 and LG-SB-147) were collected from just inside the proposed northern and northeastern perimeter of Area-4A. The maximum arsenic concentration in these two borings was detected in the sample from LG-SB-147 (1,770 mg/kg). TCLP arsenic in the same sample was 2.85 mg/L. These total arsenic and TCLP concentrations are below the cleanup objective established for Area-4A.

Mr. Rudolph H. Trinks

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Soil Quality Along the Eastern Perimeter of Area-4A

Three soil borings (LG-SB-143, LG-SB-144 and LG-SB-145) were completed adjacent to the fence along the eastern perimeter of Area-4A. Arsenic concentrations detected in soil samples LG-SB-143 and LG-SB-144 were 39,000 milligrams per kilogram (mg/kg) and 58,800 mg/kg, respectively. Although no TCLP for arsenic data were generated for these samples, based on the total arsenic concentrations, these samples exceed the cleanup objective established in the Soil IRM Plan.

Roux Associates is awaiting the results of a property line and utility survey for the eastern perimeter of the Lagoon Area to determine if it is possible to address the arsenic-impacted soil along the eastern perimeter of Area-4A.

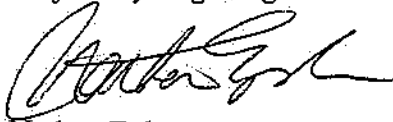
If you have any questions, or require additional information, please do not hesitate to call.

Sincerely,

ROUX ASSOCIATES, INC.



Michael Roux
Project Hydrogeologist



Nathan Epler
Principal Hydrogeologist

Enclosure

cc: Anthony Quatararo, New York State Department of Environmental Conservation
Mike Komoroske, New York State Department of Environmental Conservation
Walt Wintsch, New York State Department of Environmental Conservation
Eric Obrecht, New York State Department of Environmental Conservation
Dan Lightsey, New York State Department of Environmental Conservation
Lani Rafferty, New York State Department of Health
Stephen Lattanzio, Besicorp Development, Inc.
Charlie McGuckin, Roux Associates, Inc.
Omar Ramotar, Roux Associates, Inc.

**Table 1. Summary of Arsenic and TCLP Arsenic Detected in Area-4A Soils,
Supplemental PDI, BASF Corporation, Rensselaer, New York Facility**

Sample Location	Sample Depth (ft bls)	Arsenic Concentration (mg/kg)	TCLP Arsenic Concentration (mg/L)	Sample Date
LG-SB-122	0-2	146	NA	Feb 2001
LG-SB-122	2-4	85.6	NA	Feb 2001
LG-SB-122	4-6	79.4	NA	Feb 2001
LG-SB-122	6-8	90.9	NA	Feb 2001
LG-SB-122	8-10	70.7	NA	Feb 2001
LG-SB-122	10-12	20	0.03 U	Feb 2001
LG-SB-123	0-2	230	NA	Feb 2001
LG-SB-123	2-4	17.7	NA	Feb 2001
LG-SB-123	4-6	3,050	NA	Feb 2001
LG-SB-123	6-8	52,600	NA	Feb 2001
LG-SB-123	6-8	110,000	636	Oct 2001
LG-SB-123	8-10	79,400	NA	Feb 2001
LG-SB-123	8-10	117,000	261	Oct 2001
LG-SB-123	10-12	16,000	NA	Feb 2001
LG-SB-124	0-2	4,160	NA	Feb 2001
LG-SB-124	0-2	471	0.424	Oct 2001
LG-SB-124	2-4	14,400	NA	Feb 2001
LG-SB-124	2-4	602	1.38	Oct 2001
LG-SB-124	4-6	9,520	NA	Feb 2001
LG-SB-124	4-6	7,340	39	Oct 2001
LG-SB-124	6-8	29,200	NA	Feb 2001
LG-SB-124	6-8	127,000	981	Oct 2001
LG-SB-124	8-10	51,900	628	Feb 2001
LG-SB-124	10-12	32,500	NA	Feb 2001
LG-SB-125	0-2	1,070	NA	Feb 2001
LG-SB-125	2-4	2,290	NA	Feb 2001
LG-SB-125	2-4	3,160	4.65	Oct 2001
LG-SB-125	4-6	167	NA	Feb 2001
LG-SB-125	6-8	13,700	NA	Feb 2001
LG-SB-125	12-14	2,300	NA	Feb 2001

**Table 1. Summary of Arsenic and TCLP Arsenic Detected in Area-4A Soils,
Supplemental PDI, BASF Corporation, Rensselaer, New York Facility**

Sample Location	Sample Depth (ft bls)	Arsenic Concentration (mg/kg)	TCLP Arsenic Concentration (mg/L)	Sample Date
LG-SB-126	0-2	73.2	NA	Mar 2001
LG-SB-126	2-4	690	NA	Mar 2001
LG-SB-126	4-6	1,780	NA	Mar 2001
LG-SB-126	6-8	1,820	NA	Mar 2001
LG-SB-126	8-10	1,880	NA	Mar 2001
LG-SB-126	10-12	1,150	NA	Mar 2001
LG-SB-127	0-2	170	NA	Mar 2001
LG-SB-127	2-4	18.7	NA	Mar 2001
LG-SB-127	4-6	3.3	NA	Mar 2001
LG-SB-127	6-8	449	NA	Mar 2001
LG-SB-127	8-10	1,760	NA	Mar 2001
LG-SB-127	10-12	344	NA	Mar 2001
LG-SB-127	12-14	15.8	NA	Mar 2001
LG-SB-130	0-2	74.9	NA	Mar 2001
LG-SB-130	2-4	641	NA	Mar 2001
LG-SB-130	4-6	319	NA	Mar 2001
LG-SB-130	6-8	602	NA	Mar 2001
LG-SB-130	8-10	171	NA	Mar 2001
LG-SB-130	10-12	58.2	NA	Mar 2001
LG-SB-140	8-10	269	NA	Jun 2002
LG-SB-141	8-10	246	NA	Jun 2002
LG-SB-142	6-8	1,080	1.07	Jun 2002
LG-SB-143	8-10	39,000	NA	Jun 2002
LG-SB-144	8-10	58,800	NA	Jun 2002
LG-SB-145	6-8	873	NA	Jun 2002

**Table 1. Summary of Arsenic and TCLP Arsenic Detected in Area-4A Soils,
Supplemental PDI, BASF Corporation, Rensselaer, New York Facility**

Sample Location	Sample Depth (ft bls)	Arsenic Concentration (mg/kg)	TCLP Arsenic Concentration (mg/L)	Sample Date
LG-SB-146	8-10	468	NA	Jun 2002
LG-SB-147	8-10	1,770	2.85	Jun 2002

ft bls - Feet below land surface

mg/kg - Milligrams per kilogram

mg/L - Milligrams per Liter

NA - Not analyzed

TCLP - Toxicity Characteristic Leaching Procedure

U - Not detected at reported detection limit



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SOIL BORING LOG

WELL NO. LG-SB-140	NORTHING Not Measured	EASTING Not Measured
PROJECT NO./NAME 25111Y / BASF Corporation	LOCATION 36 Riverside Drive	
APPROVED BY M. Roux	LOGGED BY C. Battista	Reisselaer, New York
DRILLING CONTRACTOR/DRILLER Roux / M. Kroll	GEOGRAPHIC AREA Lagoon Area Area-4A	
DRILL BIT DIAMETER/TYPE 2-in. / Drive Sampler	BOREHOLE DIAMETER 2-inches	DRILLING EQUIPMENT/METHOD Geoprobe 5400 / Geoprobe
LAND SURFACE ELEVATION Not Measured	DEPTH TO WATER Not Measured	SAMPLING METHOD 2" Macro-Core
	BACKFILL Cuttings	START-FINISH DATE 6/4/02-6/4/02

Depth, feet	Graphic Log	Visual Description	Blow Counts per 6"	PID Values (ppm)	REMARKS
1		Gray to purple stained coarse gravel; moist		2.7	
1.5		Light brown CLAY; moist			
2.5		Dark brown fine to coarse SAND, trace Gravel, trace Silt, little Clay; moist	2.4		
4.5		Brown fine to coarse SAND, little Clay, little Coal, trace Silt, little Brick; moist	3.1		
6.5		Brown fine to coarse SAND, little Clay, trace Silt, trace Gravel; moist	2.9		
8.5		Brown fine to coarse SAND, trace Gravel; moist	2.5		Sample LG-SB-140 8-10 for Arsenic (hold for TCLP arsenic).
10					Bottom of boring at 10 feet below land surface.

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SOIL BORING LOG

WELL NO. LG-SB-141	NORTHING Not Measured	EASTING Not Measured	
PROJECT NO./NAME 25111Y / BASF Corporation		LOCATION 36 Riverside Drive	
APPROVED BY M. Roux	LOGGED BY C. Battista	Rensselaer, New York	
DRILLING CONTRACTOR/DRILLER Roux / M. Kroll		GEOGRAPHIC AREA Lagoon Area Area-4A	
DRILL BIT DIAMETER/TYPE 2-in. / Drive Sampler	BOREHOLE DIAMETER 2-inches	DRILLING EQUIPMENT/METHOD Geoprobe 5400 / Geoprobe	SAMPLING METHOD 2" Macro-Core
LAND SURFACE ELEVATION Not Measured	DEPTH TO WATER Not Measured	BACKFILL Cuttings	START-FINISH DATE 6/4/02-6/4/02

Depth, feet	Graphic Log	Visual Description	Blow Counts per 6"	PID Values (ppm)	REMARKS
1		Gray to purple stained coarse gravel; moist		0.7	
2		Light brown CLAY; moist		0.9	
3		Brown fine to coarse SAND, trace Gravel, trace Silt; moist		2.4	
4		Brown fine to coarse SAND, some Clay, trace Gravel, trace Silt; moist		2.6	
5		Brown fine to coarse SAND, trace Gravel, trace Silt; moist		1.1	Sample LG-SB-141 8-10 for Arsenic (hold for TCLP Arsenic).
6		Brown fine to coarse SAND, trace Gravel, trace Silt; moist			
7					
8					
9					
10					Bottom of boring at 10 feet below land surface.

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SOIL BORING LOG

WELL NO. LG-SB-142	NORTHING Not Measured	EASTING Not Measured		
PROJECT NO./NAME 25111Y / BASF Corporation		LOCATION 36 Riverside Drive		
APPROVED BY M. Roux	LOGGED BY C. Battista	Rensselaer, New York		
DRILLING CONTRACTOR/DRILLER Roux / M. Kroll		GEOGRAPHIC AREA Lagoon Area Area-4A		
DRILL BIT DIAMETER/TYPE 2-in. / Drive Sampler	BOREHOLE DIAMETER 2-inches	DRILLING EQUIPMENT/METHOD Geoprobe 5400 / Geoprobe	SAMPLING METHOD 2" Macro-Core	START-FINISH DATE 6/4/02-6/4/02
LAND SURFACE ELEVATION Not Measured	DEPTH TO WATER Not Measured	BACKFILL Cuttings		

Depth, feet	Graphic Log	Visual Description	Blow Counts per 6"	PID Values (ppm)	REMARKS
1		Grey to purple stained coarse gravel; moist		7.0	
2		Light brown CLAY; moist			
3		Dark brown fine to coarse SAND, trace Gravel, trace Silt, trace Clay; moist	2.7		
4		Dark brown fine to coarse SAND, trace Gravel; moist	4.8		
5					
6		Light to dark brown fine to coarse SAND, trace Gravel; moist	5.5		Sample LG-SB-142 6-8 for Arsenic (hold for TCLP Arsenic);
7					
8					Bottom of boring at 8 feet below land surface.



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SOIL BORING LOG

WELL NO: LG-SB-143	NORTHING Not Measured	EASTING Not Measured
PROJECT NO./NAME 25111Y / BASF Corporation	LOCATION 36 Riverside Drive	
APPROVED BY M. Roux	LOGGED BY C. Battista	Rensselaer, New York
DRILLING CONTRACTOR/DRILLER Roux / M. Kröll	GEOGRAPHIC AREA Lagoon Area Area-4A	
DRILL BIT DIAMETER/TYPE 2-in. / Drive Sampler	BOREHOLE DIAMETER 2-inches	DRILLING EQUIPMENT/METHOD Geoprobe 5400 / Geoprobe
LAND SURFACE ELEVATION Not Measured	DEPTH TO WATER Not Measured	SAMPLING METHOD 2" Macro-Core
	BACKFILL Cuttings	START-FINISH DATE 6/4/02-6/4/02

Depth, feet	Graphic Log	Visual Description	Blow Counts per 6"	PID Values (ppm)	REMARKS
1.		Brown to dark brown fine to coarse SAND, little Gravel, trace Silt, trace Roots; moist		2.4	
2.		Rust colored to dark brown fine to coarse SAND, little Slag, little Cinders, little Gravel; moist		0.0	
3.					
4.		Brown fine to coarse SAND, little Gravel, trace Silt; moist		2.2	
5.					
6.		Brown to purple-stained fine to coarse SAND, little Gravel, little Silt, little Clay, trace Slag, trace Cinders; moist		1.2	
7.					
8.		Purple-stained fine to coarse SAND, some Gravel, trace Silt; moist		0.0	Sample LG-SB-143 8-10' for Arsenic (hold for TCLP Arsenic).
9.					
10.					Bottom of boring at 10 feet below land surface.

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SOIL BORING LOG

WELL NO. LG-SB-144	NORTHING Not Measured	EASTING Not Measured		
PROJECT NO./NAME 25111Y / BASF Corporation		LOCATION 36 Riverside Drive		
APPROVED BY M. Roux	LOGGED BY C. Battista	Rensselaer, New York		
DRILLING CONTRACTOR/DRILLER Roux / M. Kroll		GEOGRAPHIC AREA Lagoon Area Area-4A		
DRILL BIT DIAMETER/TYPE 2-in. / Drive Sampler	BOREHOLE DIAMETER 2-inches	DRILLING EQUIPMENT/METHOD Geoprobe 5400 / Geoprobe	SAMPLING METHOD 2" Macro-Core	START-FINISH DATE 6/4/02-6/4/02
LAND SURFACE ELEVATION Not Measured	DEPTH TO WATER Not Measured	BACKFILL Cuttings		

Depth, feet	Graphic Log	Visual Description	Blow Counts per 6"	PID Values (ppm)	REMARKS
1		Light brown to brown fine to coarse SAND, little Gravel, trace Silt, trace Roots, trace Slag, trace Cinders; moist		5.3	
2		Brown fine to coarse SAND, little Gravel, trace Silt, trace Roots; moist		2.2	
3					
4		Brown fine to coarse SAND, little Gravel, trace Silt, trace Roots; moist		12.0	
5		Black, purple, and white ASH and CINDERS, little Slag, little fine to coarse Sand; moist			
6				8.5	
7		Purple SILT; moist			Material liquifies when mixed.
8		Purple SILT, little Sand, little Gravel, trace gray metallic flakes; moist		8.7	Sample LG-SB-144 8-10 for Arsenic (hold for TCLP Arsenic).
9					
10		Purple SILT, little Sand, little Gravel, trace gray metallic flakes; wet			Bottom of boring at 10 feet below land surface.

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SOIL BORING LOG

WELL NO. LG-SB-145	NORTHING Not Measured	EASTING Not Measured		
PROJECT NO./NAME 25111Y / BASF Corporation	LOCATION 36 Riverside Drive			
APPROVED BY M. Roux	LOGGED BY C. Battista	Rensselaer, New York		
DRILLING CONTRACTOR/DRILLER Roux / M. Kroll		GEOGRAPHIC AREA Lagoon Area Area-4A		
DRILL BIT DIAMETER/TYPE 2-in. / Drive Sampler	BOREHOLE DIAMETER 2-inches	DRILLING EQUIPMENT/METHOD Geoprobe 5400 / Geoprobe	SAMPLING METHOD 2" Macro-Core	START-FINISH DATE 6/4/02-6/4/02
LAND SURFACE ELEVATION Not Measured	DEPTH TO WATER Not Measured	BACKFILL Cuttings		

Depth, feet	Graphic Log	Visual Description	Blow Counts per 6"	PID Values (ppm)	REMARKS
1		Brown to dark brown fine to coarse SAND, some Gravel, trace Silt, trace Cinders; moist		8.3	
2		Light brown to brown SILT and CLAY; some Gravel, little Sand; moist			
3				6	
4		Dark purple-stained fine to coarse SAND, little Silt, little Cinders; moist			
5		White to dark brown ASH and CINDERS, little Gravel, little Sand; moist		7.6	
6		White ASH and CINDERS; trace brown Silt; trace brown Clay; moist		2.3	Sample LG-SB-145.6-8 for Arsenic (hold for TCLP Arsenic).
7					
8					Bottom of boring at 8 feet below land surface.

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WELL NO. LG-SB-146		NORTHING Not Measured		EASTING Not Measured	
PROJECT NO./NAME 25111Y / BASF Corporation				LOCATION 36 Riverside Drive	
APPROVED BY M. Roux		LOGGED BY C. Battista		Rensselaer, New York	
DRILLING CONTRACTOR/DRILLER Roux / M. Kröll				GEOGRAPHIC AREA Lagoon Area Area-4A	
DRILL BIT DIAMETER/TYPE 2-in. / Drive Sampler		BOREHOLE DIAMETER 2-inches		DRILLING EQUIPMENT/METHOD Geoprobe 5400 / Geoprobe	SAMPLING METHOD 2" Macro-Core
LAND SURFACE ELEVATION Not Measured		DEPTH TO WATER Not Measured		BACKFILL Cuttings	START-FINISH DATE 6/4/02-6/4/02

Depth, feet	Graphic Log	Visual Description	Blow Counts per 6"	PID Values (ppm)	REMARKS
		ASPHALT and Gravel sub-base		4.0	
1		Brown fine to coarse SAND, little Gravel, little Silt, trace Clay; moist			
2		Brown fine to coarse SAND, little Gravel, little Silt, trace Clay; moist		2.5	
3					
4		Brown medium to coarse SAND, trace Gravel; moist		2.3	
5					
6		Brown, medium to coarse SAND, little Gravel; moist		1.7	
7					
8		Brown (with purple-staining) medium to coarse SAND, little Gravel; moist			
9		Light brown CLAY, trace Roots; moist		1.7	Sample LG-SB-146 8-10 for Arsenic (hold for TCLP Arsenic).
10					
11		Light brown CLAY, trace Roots; moist			
12					Bottom of boring at 12 feet below land surface.

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WELL NO. LG-SB-147	NORTHING Not Measured	EASTING Not Measured		
PROJECT NO./NAME 25111Y / BASF Corporation		LOCATION 36 Riverside Drive		
APPROVED BY M. Roux	LOGGED BY C. Battista	Rensselaer, New York		
DRILLING CONTRACTOR/DRILLER Roux / M. Kroll		GEOGRAPHIC AREA Lagoon Area Area-4A		
DRILL BIT DIAMETER/TYPE 2-in. / Drive Sampler	BOREHOLE DIAMETER 2-inches	DRILLING EQUIPMENT/METHOD Geoprobe 5400 / Geoprobe	SAMPLING METHOD 2" Macro-Core	START-FINISH DATE 6/4/02-6/4/02
LAND SURFACE ELEVATION Not Measured	DEPTH TO WATER Not Measured	BACKFILL Cuttings		

Depth, feet	Graphic Log	Visual Description	Blow Counts per 6"	PID Values: (ppm)	REMARKS
1		ASPHALT and Gravel sub-base		9.2	
2		Brown fine to coarse SAND, little Gravel, trace Silt; moist		0.0	
3		Brown fine to coarse SAND, little Gravel, trace Silt, trace Clay, trace Brick; moist			
4		Brown fine to coarse SAND, little Gravel; moist		5.2	
5					
6		Brown fine to coarse SAND, little Gravel, trace Silt; moist		0.7	
7					
8		Brown fine to coarse SAND, trace Gravel, trace Silt; moist		0.0	Sample LG-SB-147 8-10 for Arsenic (hold for TCLP Arsenic).
9					
10		Dark brown (with purple-staining) ASH and CINDERS, some fine to coarse Sand, little Slag, trace Brick; moist			Bottom of boring at 10 feet below land surface.

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