FINAL

REMEDIAL ACTION/CLOSURE REPORT OLD SMALL ARMS RANGE (SITE SS-033)

PLATTSBURGH AIR FORCE BASE PLATTSBURGH, NEW YORK

AFCEE Contract No. F41624-97-D-8011 Delivery Order No. 0027

Prepared for:

Air Force Center for Environmental Excellence (AFCEE)
Environmental Restoration Division
Brooks Air Force Base, Texas

and the

Air Force Real Property Agency Plattsburgh Air Force Base, New York

Prepared by:



201 Gibraltar Rd. Suite 100 Horsham, PA 19044-2314

August 2003

DRAFT CLOSURE REPORT OLD SMALL ARMS RANGE (SS-033)

RESPONSE TO NYSDEC COMMENTS (letter dated March 31, 2003)

1. <u>Page iii</u> – ROD should be added to List of Acronyms and Abbreviations.

Response: ROD was added to the List of Acronyms and Abbreviations.

2. <u>Page 1</u> – ROD should be spelled out in the first sentence.

Response: ROD was spelled out in the first sentence.

3. Page 3 – "Range" should be inserted after "Arms" in the first sentence of Section 2.3.

Response: The word "Range" was inserted after "Arms" in the first sentence of Section 2.3.

4. <u>Page 6</u> – Was seed applied after regrading?

Response: Yes, ryegrass was dispersed over the excavation area. The area is currently overgrown by weeds native to the area.

5. <u>Page 11</u> — The reference to a NYSDEC "Bureau of Hazardous Waste Remediation" should be corrected to Division of Hazardous Waste Remediation." The document may also note that this NYSDEC division has been re-named as the Division of Environmental Remediation.

Response: Page 11 was corrected to read "Division of Hazardous Waste Remediation" and the re-naming as the Division of Environmental Remediation noted in the text.

6. <u>Figures 4 and 5</u> – Figures 4 and 5 apparently show an identical extent of excavation, although the text indicates that Figure 5 should show an excavation area greater than that shown in Figure 4 (due to the removal of additional soil after a failed sidewall sample for arsenic). Figure 5 should be revised or an explanation provided in the text.

<u>Response:</u> Figures 4 and 5 have been revised to show the areas of additional excavation as compared to the original excavation in October 2001.

NOTE: USEPA in their letter dated July 24, 2003 stated that they had no comments.

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LIST OF ACRONYMS AND ABBREVIATIONS

AFB Air Force Base

AFRPA Air Force Real Property Agency

AFCEE Air Force Center for Environmental Excellence

amsl above mean sea level

ARAR Applicable or Relevant and Appropriate Requirement

AST above ground storage tank

BTEX benzene, toluene, ethyl benzene, xylenes

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

DOD Department of Defense

EE/CA Engineering Evaluation/Cost Analysis
EPA U.S. Environmental Protection Agency

FFA Federal Facilities Agreement

FSP Field Sampling Plan HASP Health and Safety Plan

HQ Headquarters

IRP Installation Restoration Program
MTBE methyl tertiary butyl ether
NCP National Contingency Plan

NFA No Further Action
NPL National Priorities List

NYSDEC New York State Department of Environmental Conservation

PAH polycyclic aromatic hydrocarbons

PARC Plattsburgh Airbase Redevelopment Corporation

RAB Restoration Advisory Board RCO Recommended Cleanup Objective

RCRA Resource Conservation and Recovery Act

RI Remedial Investigation ROD Record of Decision

QAPP Quality Assurance Project Plan QA/QC quality assurance/quality control

SARA Superfund Amendments and Reauthorization Act

SI Site Investigation

SS Spill Site

SSEHSP Site-Specific Environmental Health and Safety Plan

SVOC Semi-Volatile Organic Compounds

TAGM Technical and Administrative Guidance Memorandum

TCLP Toxicity Characteristic Leaching Procedure

USAF United States Air Force

USEPA U.S. Environmental Protection Agency

VOC Volatile Organic Compound

WP Work Plan

LIST OF UNITS OF MEASURE

below ground surface bgs

ft/ft foot/feet ft² square feet ft/d feet per day

gallons per minute gpm

organic carbon-water partition coefficient Koc

liter L milligram mg MSL mean sea level parts per billion ppb parts per million ppm

μg/kg micrograms per kilogram

 $\mu g/l$ micrograms/liter

micrograms per cubic meter

μg/m³ yd³ cubic yard

1.0 INTRODUCTION

1.1 Background

This Closure Report summarizes the activities performed to remove arsenic-contaminated soil at the Old Small Arms Range (also referred to as SS-033) at Plattsburgh Air Force Base (PAFB), New York in accordance with the Record of Decision (ROD) (March 2001). This work was performed for the Air Force Center for Environmental Excellence (AFCEE), Brooks Air Force Base, Texas by Versar, Inc. (Versar) under Contract No. F41624-97-D-8011, Delivery Order (DO) 0027.

The United States Air Force (USAF) performed a remedial action of arsenic-contaminated soil from the Old Small Arms Range as directed in the ROD. This remedial action was performed pursuant to the Federal Facilities Agreement (FFA), as a part of the Department of Defense (DOD) Installation Restoration Program (IRP). The IRP was developed as a component of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986. The IRP at Plattsburgh AFB is currently being administered by the Air Force Real Property Agency (AFRPA) and implemented according to an interagency FFA (Docket No. II-CERCLA-FFA-102001) among the USAF, the United States Environmental Protection Agency (USEPA), and the New York State Department of Environmental Conservation (NYSDEC).

1.2 Report Organization

Section 1.0 presents an Introduction. Section 2.0 provides background information and a general description of the Old Small Arms Range. Section 3.0 describes the field activities. Section 4.0 summarizes the analytical results of the confirmatory and characterization sampling. Section 5.0 discusses the management of waste material. Section 6.0 presents the conclusions and recommendations. Section 7.0 provides a list of references.

2.0 SITE BACKGROUND AND ENVIRONMENTAL SETTING

2.1 Site Description and History

Plattsburgh Air Force Base (PAFB) is located in Clinton County in the northeastern corner of New York State (Figure 1). The AFB is bordered by the City of Plattsburgh to the north, Lake Champlain to the east, lake shore residential communities to the southeast, the Salmon River and agricultural land to the south, and Interstate 87 to the west. On November 21, 1989, PAFB was placed on the National Priority List (NPL) by USEPA. On July 10, 1991, the USAF entered into an interagency Federal Facilities Agreement with the USEPA and the NYSDEC to implement the Installation Restoration Program (IRP). The base, formerly the home of the 380th Air Refueling Wing, officially closed on September 30, 1995. The former base is currently the responsibility of the AFRPA and the Plattsburgh Airbase Redevelopment Corporation (PARC).

Site SS-033 operated as a small arms firing range from 1960 through November 1989. The range was dismantled in the early 1990's. It consisted of 20 firing stalls facing a high backstop embankment used to stop fired rounds. The target line was located at the base of the embankment. Lead contamination resulted from the fired discharges and bullet remnants. The impacted area is the soil along the backstop embankment of the Old Small Arms Range, SS-033.

2.1.1 Site Location

SS-033 is located in the northwestern portion of the Plattsburgh AFB. The entire site consists of the firing line and backstop and is approximately 20,000 ft² in size. Route 22 and Interstate 87 border the site to the west and Route 22 borders the site to the north. Land uses near Plattsburgh AFB include residential, commercial, industrial and recreational.

2.1.2 Physical Features

SS-033 consists of an open area with a 120 ft. long by 35 ft. high embankment in the southern portion of the site. The site slopes sharply from the south at elevations ranging from 270 to 230 feet above mean sea level (amsl).

2.1.3 Site Stratigraphy

Stratigraphy in the SS-033 area generally consists of four hydrogeologic units: 1) an upper unconsolidated sand aquifer; 2) an underlying confining layer formed by a silt and clay unit; 3) a glacial till unit; and 4) a thinly bedded dolomite bedrock aquifer. The shallow sand aquifer consists of fine to medium grain sand with variable amounts of silt, coarse sand and gravel. The groundwater in some areas of the site is 2 to 5 feet below ground surface. This shallow aquifer ranges from 10 to 30 feet thick in the vicinity of the site. The sand unit typically becomes finer grained with depth, grading into the underlying silt and clay unit.

A gray silty clay unit lies beneath the unconfined sand aquifer and is approximately 6 to 10 feet thick in the area of the site. Glacial till overlies the bedrock in the vicinity of the site and consists of poorly sorted gray sand, silt and a clay matrix intermixed with gravel, cobbles and boulders. The till is reported to be 3 to 15 feet thick. The till is a water bearing unit, however, it is separated hydraulically from the overlying water table aquifer by the silty-clay confining unit. The bedrock, which underlies the till in the area, is described as thinly, horizontally to sub-horizontally, bedded dolomite.

2.1.4 Site Hydrology

Groundwater in the Plattsburgh area generally occurs in both the overburden deposits (unconfined aquifer) and in the bedrock (confined aquifer). The Adirondack Mountains to the west and south of Plattsburgh represent the major recharge area for the region, and Lake Champlain represents the regional discharge area. Other locally significant discharge areas include the Salmon and the Saranac Rivers.

Plattsburgh AFB obtains its potable water from the City of Plattsburgh municipal water system. Some residences adjacent to the base rely on private wells for drinking water. These private wells are not likely to be influenced by groundwater conditions present at the site because local groundwater flow is away from the residential wells and towards the Salmon and the Saranac Rivers.

2.2 Previous Investigations and Remediation Activities

The Air Force and its subcontractors conducted several investigative surveys of the area. It was first sampled in 1992, which prompted the 1993 removal action to excavate lead-contaminated soils, bullets and bullet fragments from the backstop embankment. A Site Investigation (SI) (URS, 1995) was initiated that led to a second removal action in 1997. OHM removed 614 tons of lead-contaminated soil. A supplemental sampling event (URS, 2000) was conducted along the embankment that identified arsenic contamination in subsurface samples at depths of 1 to 1.5 feet. Arsenic levels as high as 43.3 mg/kg were observed, exceeding the NYSDEC TAGM 4046 (Appendix A, Table 4, Column 5) recommended cleanup objective (RCO) of 7.5 mg/kg. The arsenic contamination appeared to be associated with the imported fill material used for backfill during the 1993 removal action. The former OHM excavation is outlined in **Figure 2**.

2.3 National Priorities List Status

Plattsburgh AFB has been listed on the National Priorities List (NPL) since November 1989. Multiple locations within the base are of concern, including the Old Small Arms Range Site, SS-033. The remedial action discussed in this Closure Report addresses the mitigation activities performed to achieve final closure of the Old Small Arms Range, SS-033.

3.0 REMEDIATION NARRATIVE

Project plans were prepared to support the remedial activities, including a Work Plan (WP), Field Sampling Plan (FSP), Quality Assurance Project Plan (QAPP) and Site-Specific Environmental Health and Safety Plan (SSEHSP). The WP was submitted to the NYSDEC and USEPA for review in July 2001. After regulatory comments were addressed, the WP was finalized in October 2001, which served as the basis for the remedial activities. Versar mobilized to the site on November 14, 2001. Appendix A, Photographic Log, provides photographs of the field activities.

3.1 Site Preparation

During this remedial action, the following site preparation activities were conducted:

- Access to site for VERSAR representatives and subcontractors was coordinated with AFCEE personnel and Plattsburgh AFB security;
- A utilities mark-out was requested for all active underground lines. No electric, communications, gas lines or other sensitive site features were identified;
- Containment areas were constructed with Visqueen and hay bales to stage excavated soil for characterization; and
- · No clearing or grubbing was necessary.

3.2 Health and Safety

The VERSAR Field Team Leader, Mr. Bryan Foley, served as the Site Health and Safety (H&S) Officer. Mr. Foley insured that all VERSAR and subcontractor personnel were familiar with the approved site-specific Health and Safety Plan (HASP) (VERSAR, 2001) and conducted a site orientation for all personnel to familiarize them with site features and conditions, the scope of work, and site-specific hazards. Mr. Foley also conducted daily H&S meetings each morning prior to beginning work, and ensured all work was conducted in accordance with the HASP.

The onsite work was conducted using Level D personal protective equipment (hardhat, safety glasses, steel-toed work boots and work gloves). Tyvek coveralls and booties were worn when appropriate. Access to the excavation and material staging areas was restricted using temporary security fencing consisting of orange plastic roll fencing and/or barricades.

3.3 Soil Screening

Soil samples were initially collected within the proposed excavation areas from random points to check for the presence of volatile organic vapors using a Photo-Ionization Detector (PID). These samples were subjected to headspace analysis with the PID. Approximately 4 to 8 ounces of soil were placed in a sample jar and covered with plastic wrap and aluminum foil. The sample was then warmed using a vehicle heating vent for 10 to 15 minutes, allowing the volatile organic vapors to collect and equilibrate in the headspace above the soil. The aluminum/plastic cover was then punctured using the

wand of the PID and the highest vapor concentration for each sample was noted, if any. There were no exceedances of site background levels (3-4 ppm) within the soils. The area was considered clear of volatile organics and safe to begin the excavation activities.

3.4 Excavation and Remedial Activities

VERSAR and its subcontractor, MC Environmental Services (MCES), utilized a backhoe, excavator and front-end loader, to perform the excavation, stockpiling of soil, and off-site loading of contaminated soils.

Excavation activities began November 14, 2001, at the southeast end of the site removing the first one foot of soil from the impacted area. The excavation continued to the northeast end of the site, and then returned to the southeast corner of the embankment. The southeast corner was excavated to a depth of 2.0 feet in an area approximately 30 feet long by 20 feet wide as shown in **Figure 3**. Tarps and Visqueen were used to cover the soil stockpile(s) during non-operational hours and/or inclement weather conditions prior to load-out of the soil into dump trailers. A total of 340 tons was excavated, staged and transported off-site for disposal.

On November 20, 2001, a total of 29 confirmation samples and three associated QA/QC duplicates were taken from the bottom and sidewalls of the excavation (**Figure 4**) to confirm that the limits of the excavation did not exceed the NYSDEC TAGM 4046 (Appendix A, Table 4, Column 5) arsenic recommended cleanup objective (RCO) of 7.5 mg/kg. Each confirmatory sample was analyzed for arsenic according to USEPA Method 6061a. One (1) QA/QC duplicate sample was collected for each per ten (10) confirmation samples was collected. Versar used the sampling and QA/QC protocols and procedures outlined in USEPA SW 846. Confirmation sampling procedures, protocols and results are discussed in Section 4.0, Confirmation and Characterization Sampling.

Confirmation sampling indicated "hot spots" (exceedences) along the northwestern and southeastern sections of the excavation at five sample locations (**Figure 4**). Exceedences ranged in concentration from 8.12 mg/kg to 26.5 mg/kg above the NYSDEC TAGM RCO. These findings indicated that additional excavation was required. The site was secured for the winter, and field activities were deferred until 2002.

On September 9, 2002, Versar resumed field activities. In accordance with the WP, the areas surrounding arsenic exceedence sample locations SARB-01, SARS-10, SARS-04, SARB-05 and SARS-11 (**Figure 5**) were excavated and re-sampled (Refer to Section 4.3 for additional details). A total of 72.5 tons of soil was excavated, staged and transported off-site for disposal. The re-sampled locations showed one arsenic NYSDEC TAGM exceedence area, Sample Location SARB-01, which required additional excavation.

On September 18, 2002, the area surrounding Sample Location SARB-01 was re-excavated and re-sampled. A total of 17.2 tons was excavated, staged and transported off-site for disposal. The re-sample showed no arsenic NYSDEC TAGM exceedence (Figure 6).

Following the submittal and approval of the re-sampling events Data Validation/Usability Report, VERSAR was permitted to grade and close the site. Final grading and demobilization from the site occurred on November 11, 2002. The cleanup of the staging area and decontamination pad also generated an additional 17.7 tons of residual arsenic-contaminated soil and material that required off-site disposal. Consequently, the amount of arsenic-contaminated soils sent for off-site disposal totaled 447 tons.

4.0 CONFIRMATION AND CHARACTERIZATION SAMPLING

This section describes sampling protocols, activity, and analytical results from the Old Small Arms Range, SS-033 remedial actions.

4.1 Data Quality Objectives

Confirmation samples were collected to support site closure recommendations, which required the preparation of a data validation usability report to support independent validation of the confirmation soil sampling results. The Data Validation Usability Reports for all confirmation sampling at the Old Small Arms Range are presented in **Appendix B**.

A waste characterization sample was analyzed for the parameters required by the potential waste disposal facilities. Waste characteristics are discussed in Section 5.0.

4.2 Sampling and Analysis

The sampling program was separated into two categories:

- Post-excavation or confirmation sampling
- Characterization sampling

Confirmation sampling was accompanied by a data validation/usability report. The samples collected were used to determine the extent of contamination and adequacy of contaminated soil removal at the anticipated limits of the excavation areas, while characterization sampling was used to characterize (for disposal) the potentially contaminated waste stockpiles generated from the remedial action. A data validation report was not required for the characterization samples.

All samples were analyzed for Total Arsenic and Percent Solids in accordance with EPA Methods SW846-6061(b). Arsenic concentrations were compared to NYSDEC TAGM 4046 (Appendix A, Tables 4, Column 4) Recommended Cleanup Objectives (RCOs) for soil to determine if clean conditions had been achieved and to determine offsite disposal requirements.

4.3 Excavation Confirmation Samples

Confirmation samples were collected from the limits of the excavation on November 20, 2001. Thirty-two (32) samples were collected and analyzed from the bottom and sidewalls of the excavation. Confirmation sampling locations are depicted in **Figure 4** and the analytical results are presented in **Table 1**. There were exceedences of the NYSDEC TAGM 4046 (Appendix A, Table 4, Column 5) arsenic cleanup level of 7.5 mg/kg in five samples: SARB-01, SARB-05, SARS-04, SARS-10 and SARS-11. A data validation/usability report for Kemron Project No.L0111367 and L0111369, dated December 4, 2001, was prepared and submitted for review and approval (**Appendix B**). In 2002, VERSAR subsequently removed additional soil from the impacted area around the locations of the aforementioned five samples, and the soil was re-sampled on

September 12, 2002. An additional 6 samples were collected and analyzed from the bottom and sidewalls of the excavation. Confirmation sampling locations are depicted in Figure 5, and the analytical results are presented in Table 2. Analytical results showed one arsenic exceedence of the NYSDEC TAGM 4046 (Sample Location SARB-01) and no exceedences in Sample Locations SARB-05, SARS-04, SARS-10 and SARS-11 for this re-sampling event. Consequently, Sample Location SARB-01 was re-excavated and re-sampled on September 23, 2002. The confirmation sampling location is depicted in Figure 6, and the analytical results are presented in Table 2. The analytical results show no arsenic exceedence; therefore, the area surrounding Sample Location SARB-01 was considered clean and "no further action" was necessary. A data validation/usability report for the two re-sampling events noted as Kemron Project Nos. L0209256, L0209402 and L0209417, dated November 7, 2002, was prepared and submitted for review and approval (Appendix B).

4.4 Waste Characterization Sample

Characterization sampling was performed collecting an insitu 5 point composite sample. The characterization sample was analyzed for total arsenic and a TCLP metal analysis (Table 3). The results classified the soil as non-hazardous, but in exceedence of the NYSDEC TAGM arsenic cleanup objective. Waste disposal analytical results are provided in Appendix C.

4.5 Sample Handling and Documentation

All samples were immediately placed into appropriate laboratory-supplied sample jars. Labels with all pertinent data were fixed to each sample jar for identification. Samples were then placed on ice in sample coolers to maintain a temperature of 4°C. All sample locations, dates, times, depths (if needed) and other observations were recorded in the logbook. Strict chain-of-custody (COC) procedures were followed to establish a complete sample custody record from the time of sample collection until laboratory receipt.

4.6 Data Validation

Data validation usability reports were produced for all confirmation samples (Appendix B). The results were reviewed and "qualified" if there were any concerns as shown in Tables 1 and 2 and referenced in Appendix B. The qualifiers had no impact on data usability or the conclusions presented in this closure report.

5.0 WASTE CHARACTERIZATION AND DISPOSAL

5.1 Contaminated Soil

Based on the analytical results of the characterization sample, all soils were considered contaminated due to the exceedences of the NYSDEC TAGM arsenic cleanup criteria. The entire soil volume was disposed of offsite as a regulated waste material. The contaminated soil was loaded onto dump trailers via a front-end loader and transported to New England Waste Systems-Morrisonville, NY, a permitted solid waste landfill. A total of 447 tons of arsenic-contaminated soil were transported to the New England Waste Systems-Morrisonville, NY facility. The waste characterization sample analytical results are presented in Appendix C. Waste Profile and disposal weight tickets are provided in Appendix D.

5.2 Miscellaneous Materials

All miscellaneous waste materials associated with the staging area and decontamination pad were placed into the last dump trailer and sent to the New England Waste Systems-Morrisonville, NY facility.

6.0 CONCLUSIONS AND RECOMMENDATIONS

A total of 447 tons of contaminated soils were removed and transported off-site to the New England Waste Systems-Morrisonville, NY facility. Confirmation sampling indicated that the remaining soils at SS-033 have arsenic concentrations below the NYSDEC TAGM 4046 RCOs; therefore, no further action is necessary at the Old Small Arms Range, SS-033 and the site can be considered "clean" closed.

7.0 REFERENCES

- 1. NYSDEC. 1994. Determination of Soil Clean-up Objectives and Clean-up Levels, Technical and Administrative Guidance Memorandum HWR-94-4046. Albany, NY: Division of Hazardous Waste Remediation¹.
- 2. URS Consultants, Inc. March 2001. Site SS-033 Old Small Arms Range Record of Decision, United States Department of the Air Force, Plattsburgh Air Force Base, Plattsburgh, New York, Buffalo, NY.
- 3. United States Air Force. (USAF), Air Force Center for Environmental Excellence (AFCEE), Environmental Restoration Division. May 30, 2001. Statement of Work. Remove and dispose Arsenic-contaminated soil at the Old Small Arms Range (Site SS-033) at Plattsburgh Air Force Base, New York. Project Numbers THWA2000-6001; Contract No. F41624-97-D-8011; Delivery Order: 0027.
- 4. United States Air Force. (USAF), Air Force Center for Environmental Excellence (AFCEE), Environmental Restoration Division. Quality Assurance Project Plan, Version 3.0, March 1998.
- 5. United States Environmental Protection Agency (USEPA). 1988, updated 2000. Test Methods for Evaluating Hazardous Materials and Solid Waste, SW 846, 3rd revision, Washington, D.C.
- Versar, Inc., Plattsburgh Air Force Base, Plattsburgh, NY, Work Plan, Old Small Arms Range (SS-033), October 2001, Air Force Center for Environmental Excellence (AFCEE), Environmental Restoration Division, Brooks Air Force Base, Texas, Contract No. F41624-97-D-8011, Delivery Order No. 0027.

Note: ¹ Division of Hazardous Waste Remediation has recently been re-named as the Division of Environmental Remediation.

Plattsburgh Air Force Base SS-033 Plattsburgh, NY (re-sampling events) Soil Sample Analytical Results 1 mole 1

SS-033 SOIL SAMPLE ANALYTICAL RESULTS (September 12 & 23, 2002)

SARB ^{R1} .	05-2	12 Sept-02	1.08 F
SARB-	90	20 Nov-01 12 Sept-0;	12,7
2nd re-sample SARB ^{R2} -	01-3	18-Sep-02	0.897 F
re-sample SARB ^{R1} -	01-2A sample duplicate	12 Sept-02	24.8
re-sample SARB ^{R1} ,	4-5	12 Sept-02	20.1
SARB-	Σ	20 Nov-01	20.7
S	Soil	(mg/kg)	7.5
MDL	(mg/kg)		0.35
SAMPLE LOCATION MDL	(Sample No.) (mg/kg)		Arsenic, Total

		ARSENIC	CONFIRMAT	TON SIDEWA	LL SAMPLIN	ARSENIC CONFIRMATION SIDEWALL SAMPLING RESULTS - (mg/kg)*	ng/kg)*	
SAMPLE	tu!	Site Background		re-sample		re-sample		re-sample
LOCATION MDL	MDL	o	SARS-	SARS ^{R1} -	SARS-	SARS**	SARS-	SARS"-
(Sample No.	(Sample No.) (mg/kg)	NYSDEC TAGM	94	04-2	10	10-2	1	11-2
/		Soil Clean-up						
ANALYTE		Objective						
/		(mg/kg)	20 Nov-01	20 Nov-01 12 Sept-02 20 Nov-01	20 Nov-01	12 Sept-02 20 Nov-01 12 Sept-02	20 Nov-01	12 Sept-02
Arsenic. Total	0.35	7.5	26.5	1 75 5	8.12	130 E	8.35	8.35

MDL: Method Detection Level; RDL - Reportable Detection Limit.
F: - Result is below the RDL, but above the MDL; Result is qualitatively acceptable but quantitatively unreliable due to uncertainty in precision near the limit of detection.
F: - Result is below the RDL, but above the MDL; Result is qualitatively acceptable but quantitatively unreliable due to uncertainty in precision near the limit of detection.
F: - Result is below the RDL, but above the MDL; Result is qualitatively acceptable but quantitatively care amplied to a sample and associated arsenic concentration that exceeds the NYSDEC TAGM cleanup objective, Appendix A, Table 4, Column 5.

R1 = 1st re-sample following removal of arsenic contaminated soil.

R2 = 2nd re-sample following removal of arsenic contaminated soil.

Plattsburgh Air Force Base SS-033 Soil Sample Analytical Results Plattsburgh, NY Table 2

SS-033 SOIL SAMPLE ANALTYICAL RESULTS (NOVEMBER 20, 2001) TABLE 1

SARB-	1.73
SARB- S/	1.25
SARB-	1.49
SARB- 12DUPE sample duplicate	1.71
ARSENIC CONFIRMATION BOTTOM SAMPLING RESULTS - (mg/kg)* SARB- SARB-	20.7 6.39 1.49 1.15 12.7 1.69 1.99 1.94 2.83 1.39 2.32 2.04 1.71 1.49 1.25 1.73
SARB-	2.32
TS - (mg/kg)* SARB- SARB- 11 09 10 11	1.39
SARB- 09	2.83
SARB-	1.94
ARSENIC CONFIRMATION BOTTTOM SAMPLING RESULTS - (mg/kg)* SARB- 01 02 03 04 05 06 07 08 09 10	1.99
SARB-	1.69
ARB- SARB-SARB-SARB-03 04 05 06	12.7
SARB- 04	1.15
SARB-	1.49
SARB- 02	6:39
SARB- 01	20.7
Site Background or NYSDEC TAGM Soil Clean-up Objective (mg/kg)	7.5
MDL (mg/kg)	0.35
SAMPLE LOCATION MDL (Sample No.) (mg/kg)	Arsenic, Total
ANALY	A

SARS-	1.77
SARS-	8.35 1.94 0.846 F 1.77
SARS-	1.94
SARS-	8.35
SARS-	6.11 6.14 26.5 6.37 J 1.76 J 6.94 2.00 3.58 4.21 8.12
SARS- 09	4.21
SARS- 08	3.58
SARS- 07	2.00
SARS- 06	6.94
SARS- SARS	1.76 J
SARS- 05	6.37 J
SARS-04	26.5
SARS- 03	6.14
SARS- 02DUPE sample duplicate	6.11
SARS- 02	1.85 5.04
SARS- 01	1.85
Site Background or NYSDEC TAGM Soil Clean-up Objective (mg/kg)	7.5
MDL (mg/kg)	0.35
SAMPLE LOCATION MDL (Sample No.) (mg/kg)	Arsenic, Total
ANALYT	A

MDL: Method Detection Level; RDL - Reportable Detection Limit.

F: - Result is below the RDL, but above the MDL; Result is qualitatively acceptable but quantitatively unreliable due to uncertainty in precision near the limit of detection.

J - Results are estimated and the data valid for limited purposes. The results are qualitively acceptable, but quantitatively unreliable.

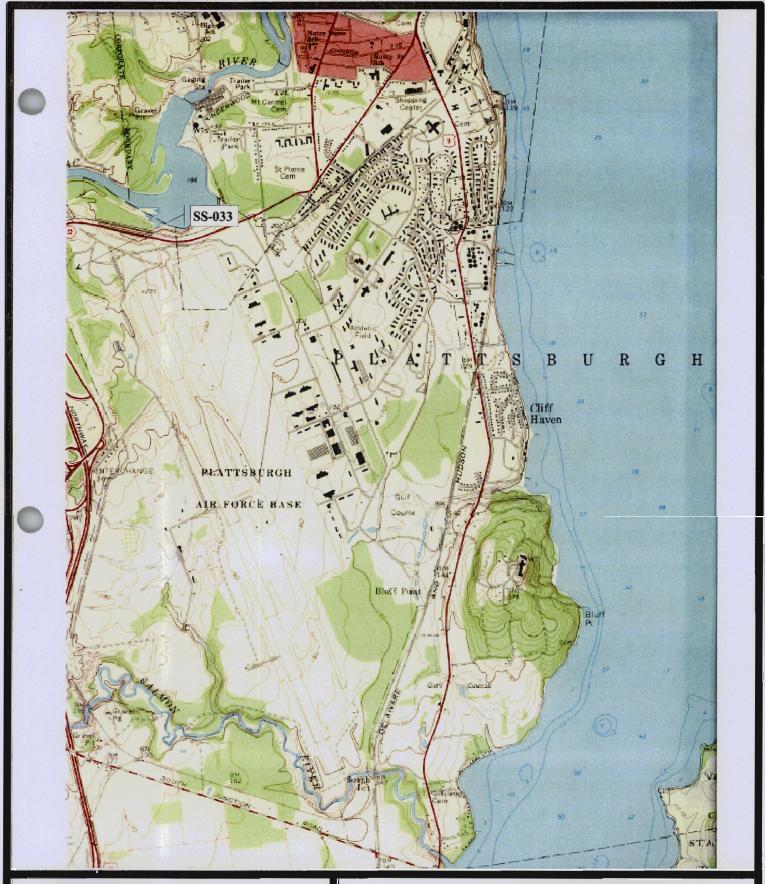
* Refer to Figure 1, Sample Location Map of Old Small Arms Range (SS-033) for specific location of soil sample arsenic concentrations.

Shaded block and bold fout identifies sample and associated arsenic concentration that exceeds the NYSDEC TAGM cleanup objective, Appendix A, Table 4, Column 5.

R = RESAMPLE

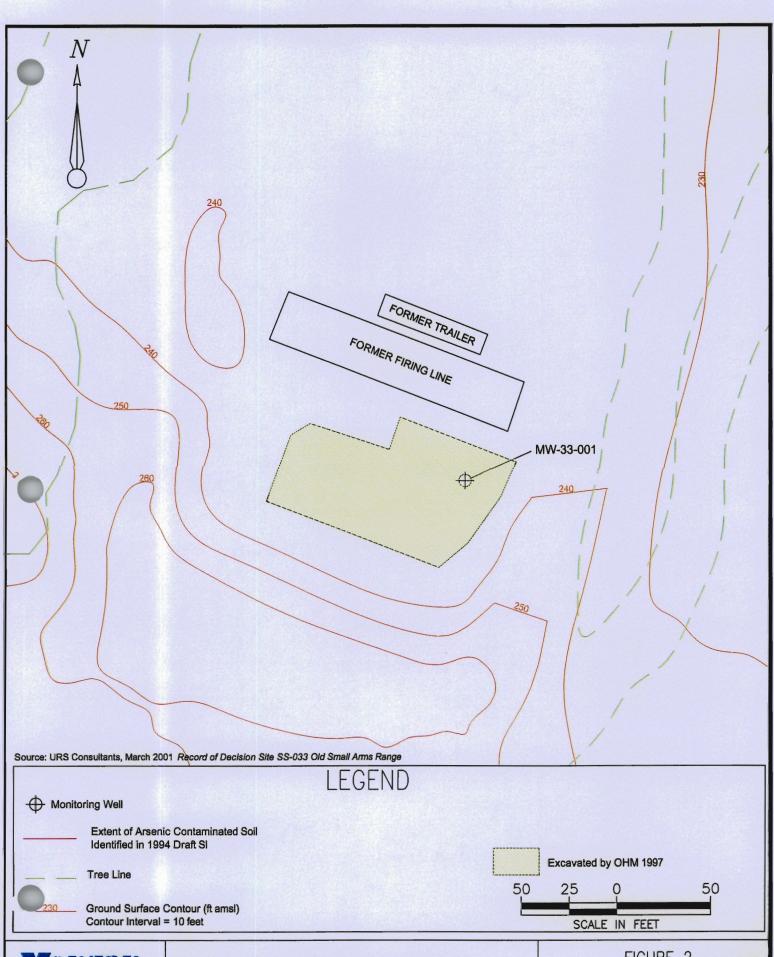
Table 3
Waste Characterization Summary
Plattsburgh Air Force Base SS-033
Plattsburgh, NY

Sample Number	Sample Location	Date Sampled	Date Analyzed	Matrix	Analysis	Analytical Method
L0110388-01	SAR-01	10/17/01	10/22/01	Soil	Silver,TCLP	6010(b)\3015
		10/17/01	10/22/01	Soil	Arsenic, TCLP	6010(b)\3015
		10/17/01	10/22/01	Soil	Barium, TCLP	6010(b)\3015
		10/17/01	10/22/01	Soil	Cadmium, TCLP	6010(b)\3015
		10/17/01	10/22/01	Soil	Chromium, TCLP	6010(b)\3015
		10/17/01	10/23/01	Soil	Mercury, TCLP	7470(a)/Method
		10/17/01	10/22/01	Soil	Lead, TCLP	6010(b)\3015
		10/17/01	10/22/01	Soil	Selenium, TCLP	6010(b)\3015

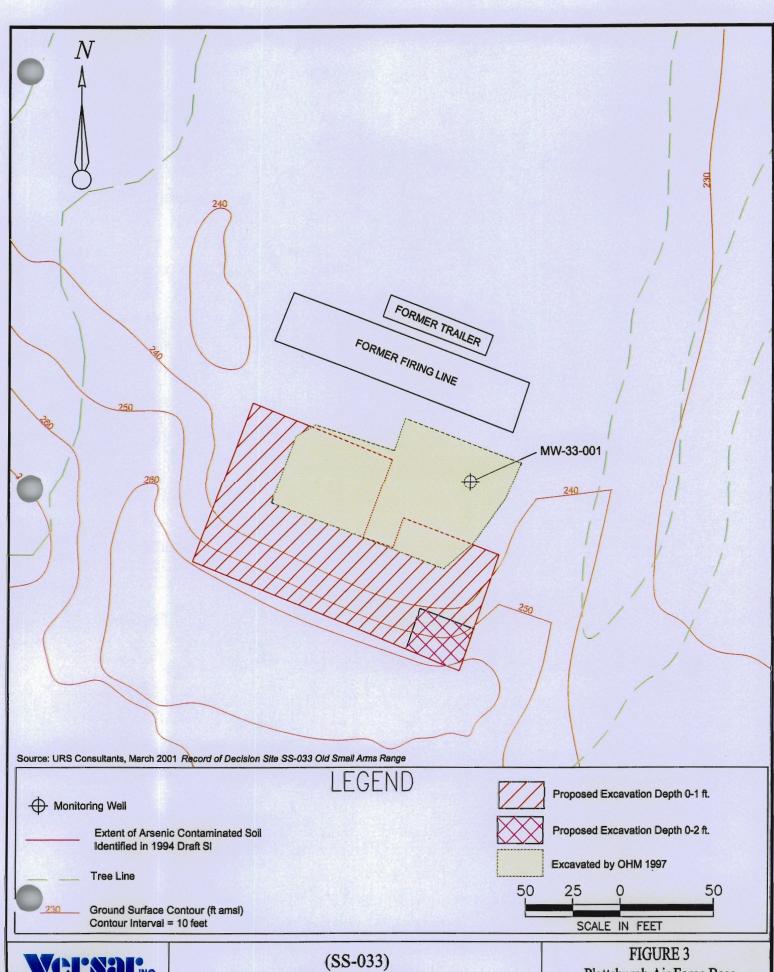




2558 Pearl Buck Road, Suite 1 Bristol, PA 19007 FIGURE 1. SITE LOCATION MAP PLATTSBURGH AIR FORCE BASE PLATTSBURGH, NY



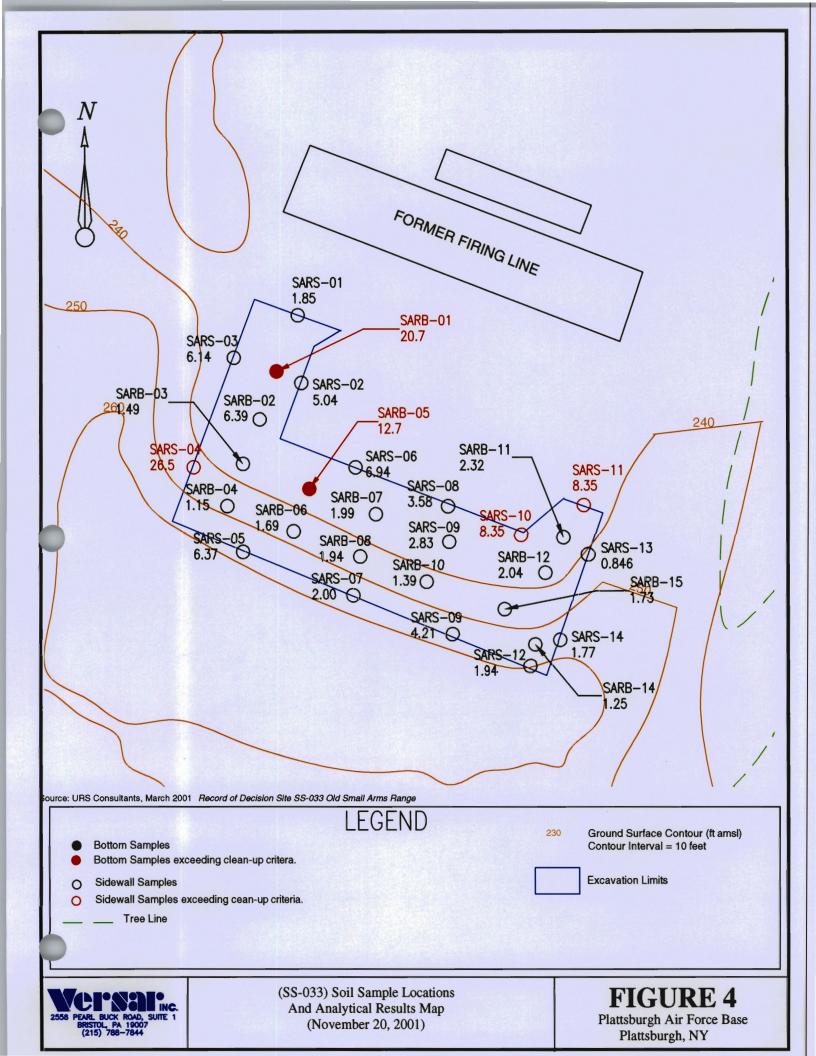


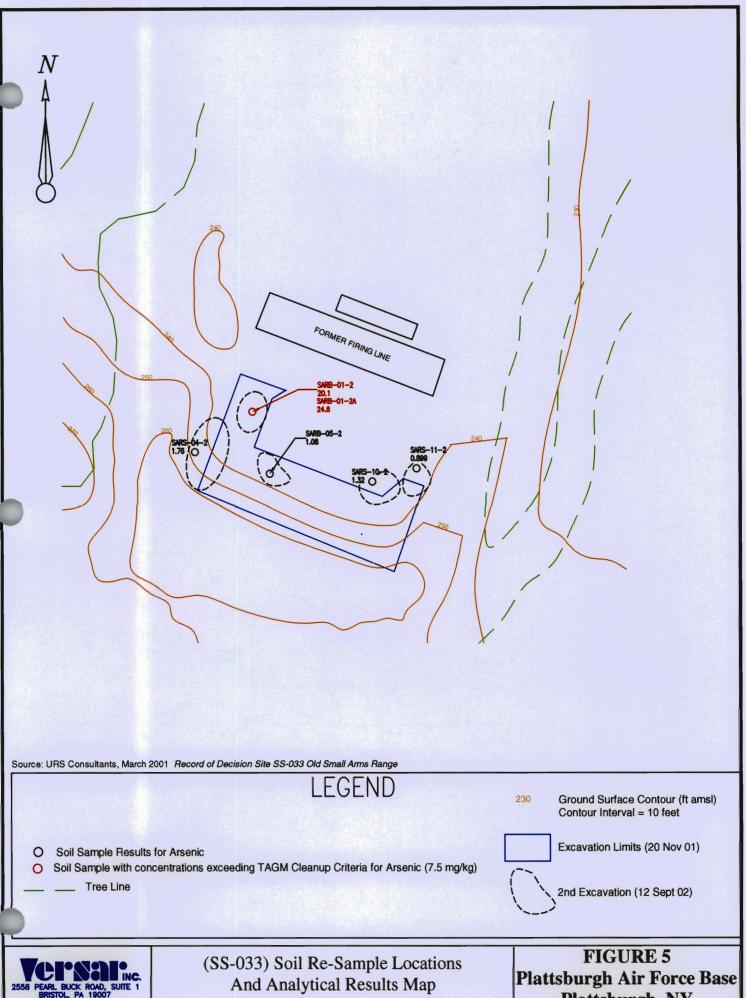




Excavation Plan

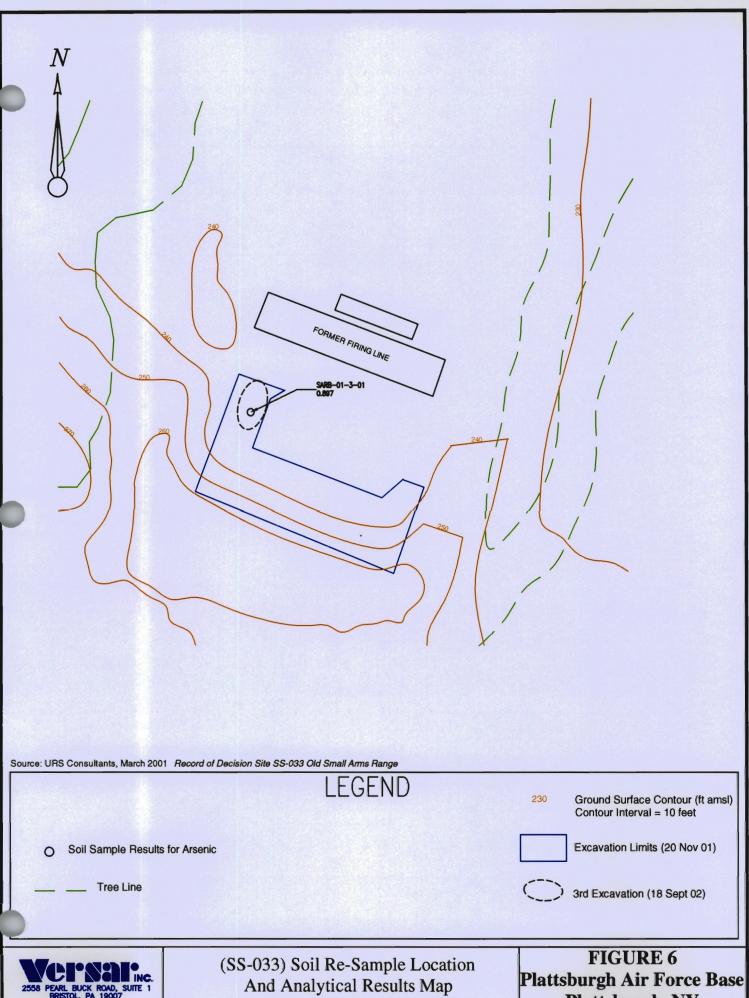
Plattsburgh Air Force Base Plattsburgh, NY





(September 12, 2002)

Plattsburgh, NY



(September 23, 2002)

Plattsburgh, NY

APPENDIX A

PHOTOGRAPHIC LOG

PHOTOGRAPHIC LOG



1. Mobilization activity



2. Removed material staging area.



3. Initial excavation activity.



4. Site after completion of initial excavation.



5. Site during removal of material from initial excavation.



6. Site during second excavation activities.



7. Removal of material from the second and third excavation activities.



8. Removal of material from the second and third excavation activities.



9. Site after second and third excavation activities



10. Site after grading and restoration.

APPENDIX B DATA VALIDATION USABILITY REPORTS

Versar INC. Revised 1/29/02

MEMORANDUM

TO: Rich Habrukowich, Versar, Bristol, PA

FROM: Donna Oswald, Versar, Lombard, IL

DATE: December 4, 2001

RE: Data Validation/Usability Report for Plattsburg AFB

Old Small Arms Range, Confirmation Soil Samples

Kemron Project No. L0111367, L0111369

1.0 INTRODUCTION

On November 20, 2001 32 sidewall and bottom confirmation soil samples including three duplicate samples, were collected at Plattsburgh AFB Old Small Arms Range, Site SS-033 (sidewall: SARS and bottom: SARB) and sent to Kemron Environmental Services (Kemron), located in Marietta, Ohio, for analysis. Samples were analyzed for total arsenic by EPA SW846 Method 6010B. The samples were reported in Kemron Project Numbers L0111367 and L0111369 Analyses were preformed in accordance with the Air Force Center for Environmental Excellence (AFCEE) Quality Assurance Project Plan (QAPP) Version 3.0 (March 1998). The analytical results are presented in Table 1.

The data were qualified in accordance with the validation protocols in the AFCEE QAPP, Version 3.0 (March 1998) and the laboratory specific control limits supplied by Kemron. The laboratory performed the initial review of the data package, and qualified the data in accordance with their internal QC requirements. Final qualification of the data was made by the Versar project chemist based on the results of Versar's data validation. The following items were reviewed during the data validation process: chain of custody, sample condition upon receipt, extraction/analysis holding times, method detection/reporting limits, laboratory control sample (LCS) recoveries, initial and continuing calibrations, second source calibration verification standards, laboratory method matrix spike/matrix spike duplicate (MS/MSD) analysis results, field duplicate precision, field QC blank contamination and report completeness.

The hierarchy of AFCEE qualifiers from most to least severe are as follows; "R" (rejected), "M" (matrix effect present), "F" (results above method detection limit, but below reporting limit), "J" (estimated value), "B" (blank contamination) and "U" (not detected).

The samples were received by Kemron intact and under proper chain-of-custody. The temperature of the sample cooler upon receipt at the laboratory was 1°C. This was outside the normal recommended range of 4 ± 2 °C but should not impact the sample results. Laboratory sample receipt records indicate that the sample cooler contained ice upon receipt and that the samples were not frozen. The chain-of-custody forms are included as an attachment.

2.0 VALIDATION

All calibration requirements as summarized in Attachment A were met for all samples. All other QC criteria were met. Samples SARS-01 and SARB-01 were used as the MS/MSD for samples analyzed for Arsenic by method 6010B. All criteria were met.

In several samples, Arsenic was detected below the RL but above the MDL. These are considered trace levels and were qualified "F" in accordance with the QAPP. These results are considered to be qualitatively acceptable but quantitatively suspect due to poor analytical precision near the limit of detection.

Samples SARB-12 and SARB-12DUP, SARS-02 and SARS-02DUP, and SARS-05 and SARS-05DUP were field duplicate pairs for this SDG for Arsenic. No criteria for the evaluation of field duplicate results are provided in the QAPP, therefore guidance provided for review of laboratory duplicates in the USEPA CLP National Functional Guidelines for Inorganic Data Review (EPA-540/R-94-013) was used. For metals, the laboratory analyzes a duplicate sample, however both aliquots are taken from the same sample jar after homogenization in the laboratory. True field duplicates would be collected from the same area, but not necessarily be homogenized prior to submission to the laboratory. Matrix spike/matrix spike duplicate relative percent difference (RPD) criteria were used to evaluate results greater than 5 times the reporting limit (RL). Matrix spike RPD criteria serve as a lower estimate of field precision as they do not include variability introduced by field sample collection activities. Results less than 5 times the RL were evaluated against criteria of ± 2 times the RL. Field precision criteria were met for arsenic in two of the three field duplicate pairs. The sample collected from SARS-05 showed evidence of sample matrix non-homogeneity during the analysis as indicated by the disparate results (6.37 and 1.76 mg/kg) from the analysis of the sample and it's field duplicate. Associated results have been flagged "J" for use as estimates.

3.0 COMPLETENESS

The AFCEE QAPP goal for completeness is 90% for soil matrixes. Percent completeness is defined as the number of valid results divided by the total number of individual target compound results. Valid results are those that have not been rejected (qualified "R"). The percent completeness was 100% for this event. The completeness goal of 90% was met for soil samples.

ATTACHMENTS

Attachment A

Initial Calibration quality control requirements for reportable analytes

QC requirement	multi-point	Multi-	Low	Second	SSC %D
	calibration	point	standard	Source	OK
,	•	%RSD or	< PQL	Standard	
		r ² OK		(SSC)	
ļ	ľ				-
ļ	ĺ				
				-	
Analytical Method					
6010B	х	X	х	x	х

Continuing Calibration quality control requirements for reportable analytes

QC requirement	Continuing Calibration Verification Standard (CCV)	CCV %D OK
Analytical Method		!
6010B	х	x

TABLES





Table 1 **Summary of Arsenic Results Bottom Confirmation Samples**

Sample ID	TAGMS	PQL	MDL	SARB-	01	SARB-	02	SARI	B-03	SARB	-04	SARB	-05
Sampling Date				11/19/0)1	11/19/	01	11/19	9/01	11/19/	01	11/19/	01
Analysis Date	ŀ			11/27/0	01	11/27/	01	11/27	7/01	11/27/	01	11/27/	01
				Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag
Arsenic (mg/kg)	7.5	1	0.35	20.7		6.39	1.7	1.49	10 V 12	1.15		12.7	
Percent Solids (%)		1	1	90		91	1 1	93		95		90	

<u> </u>												100	
Sample ID	TAGMS	PQL	MDL	SARB-	06.	SARB-	07	SARI	3-08	SARB	-09	SARB	-10
Sampling Date				11/19/0)1	11/19/	01	11/19	0/01	11/19/	01	11/19/	01
Analysis Date	1			11/27/0	01	11/27/	01	11/27	7/01	11/27/	01	11/27/	01
	1.		٠.	Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag
Arsenic (mg/kg)	7.5	1	0.35	1.69	4 5	1.99		1.94		2.83	1 20 7	1.39	
Percent Solids (%)		1	1	96		97		96		96		96	

Sample ID	TAGMS	PQL	MDL	SARB	-11	SARB	-12	SARB-12	DUPE	SARB	-13	SARB	-14
Sampling Date				11/19	/01	11/19/	01	11/19	/01	11/19/	01	11/19/	01
Analysis Date				11/27	/01	11/27/	01	11/27	/01	11/27/	01	11/27/	01
	1			Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag
Arsenic (mg/kg)	7.5	1	0.35	2.32	1, 26.	2.04	9 . 9 6	1.71		1.49		1.25	
Percent Solids (%)	. 7. 18 9	1	1	95		95		95		96	1 1 1	98_	

Sample ID	TAGMS	PQL	MDL	SARB	-15
Sampling Date	. 28			11/19/	'01
Analysis Date				11/27/	01
			· . [Result	Flag
Arsenic (mg/kg)	7.5	1	0.35	1.73	
Percent Solids (%)		1	1	95	1 1 7.

FOOTNOTES:

All results reported on a dry weight basis.
Results above the TAGMS level are bolded.
RDL - Reportable Detection Limit
MDL - Method Detection Limit





Summary of Arsenic Results Sidewall Confirmation Samples

Sample ID	TAGMS	PQL	MDL	SARS	-01	SARS	02	SARS-02	DUPE	SAR	S-03	SARS	3-04
Sampling Date	ar Transition		*	11/19	/01	11/19/	01	11/19	/01	11/19	9/01	11/19	/01
Analysis Date				11/20	/01	11/20/	01	11/20	/01	11/20	0/01	11/20	/01
				Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag
Arsenic (mg/kg)	7.5	1	0.35	1.85		5.04		6.11		6.14		26.5	
Percent Solids (%)		1	1	96		95		95		94		88	

<u>. 1 - 31 - 1 01 - 14 - 14 - 14 14 14 14 14 14 14 14 14 14 14 14 14 </u>	4 - 1 - 2 - 4												
Sample ID	TAGMS	PQL	MDL	SARS	-05	SARS-05	DUPE	SARS	-06	SAR	5-07	SARS	-08
Sampling Date	· ·			11/19	/01	11/19/	01	11/19	/01	11/19	0/01	11/19	/01
Analysis Date			:	11/20	/01	11/20/	01	11/20	/01	11/20)/01	11/20	/01
				Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag
Arsenic (mg/kg)	7.5	1	0.35	6.37	J	1.76	J	6.94	1.	2		3.58	that is,
Percent Solids (%)		1	1	93		96		91		93		94	

Sample ID	TAGMS	PQL	MDL	SARS	-09	SARS	10	SARS	-11	SAR	S-12	SARS	-13
Sampling Date		· .		11/19	/01	11/19/	01	11/19	/01	11/19)/01	11/19	/01
Analysis Date				11/20	/01	11/20/	01	11/20	/01	11/20)/01	11/20	/01
				Result	Flag	Result	Flag	Result	Flag	Result	Flag	Result	Flag
Arsenic (mg/kg)	7.5	- 1	0.35	4.21		8.12	1.44	8.35	1.42	1.94	- · · · · · · · · · · · · · · · · · · ·	0.846	F
Percent Solids (%)		1	1	95		93		93		96		99	

Sample ID	TAGMS	PQL	MDL	SARS	-14
Sampling Date				11/19/	01
Analysis Date	1			11/20/	01
	1		[Result	Flag
Arsenic (mg/kg)	7.5	1	0.35	1.77	
Percent Solids (%)	7.5	1	1	97	

FOOTNOTES:

All results reported on a dry weight basis.

Results above the TAGMS level are bolded.

RDL - Reportable Detection Limit

MDL - Method Detection Limit

F - Result is below the RDL but above the MDL: Result is qualitatively acceptable but quantitatively unreliable due to uncertainity in precision near the limit of detection.

J- Results are estimated and the data are valid for limited purposes. The results are qualitatively acceptable but quantitatively unreliable.

CASE NARRATIVE

KEMRON ENVIRONMENTAL SERVICES REPORT NARRATIVE

L0111367

CHAIN OF CUSTODY:

The chain of custody number was 104816.

SHIPMENT CONDITIONS:

The chain of custody form was received sealed in a cooler. The cooler temperature was 1° C.

SAMPLE MANAGEMENT:

All samples received were intact.

I certify that this data package is in compliance with the terms and conditions agreed to by the client and KEMRON Environmental Services, both technically and for completeness, except for the conditions noted above. Release of the data contained in this hardcopy data package has been authorized by the Laboratory Manager or designated person, as verified by the following signature.

REVIEWED: Ja M TWO MED DATE: 11-27-01

REPORT NARRATIVE **METALS**

KEMRON Login No: L0111367

METHOD

Analysis: SW-846 6010/6020/7000

HOLDING TIMES

Sample Preparation: All holding times were met. Sample Analysis: All holding times were met.

PREPARATION

Sample preparation proceeded normally.

CALIBRATION

Initial calibrations: All acceptance criteria were met.

Alternate Source Standards: All acceptance criteria were met. Continuing Calibration: All acceptance criteria were met.

BATCH QA/QC

Method Blank: All acceptance criteria were met. Laboratory Control Sample: All acceptance criteria were met

SAMPLES

All acceptance criteria were met.

I certify that this data package is in compliance with the terms and conditions agreed to by the client and KEMRON Environmental Services, both technically and for completeness, except for the conditions noted above. Release of the data contained in this hardcopy data package has been authorized by the Laboratory Manager or designated person, as verified by the following signature.

Analyst: ALT

Janus Beery DATE: 11/28/01

Rev. 6/00

KEMRON ENVIRONMENTAL SERVICES REPORT NARRATIVE

L0111369

CHAIN OF CUSTODY:

The chain of custody number was 104815.

SHIPMENT CONDITIONS:

The chain of custody form was received sealed in a cooler. The cooler temperature was 1° C.

SAMPLE MANAGEMENT:

All samples received were intact. There were several time discrepancies between the chain of custody and the sample bottles. Kemron used the times from the chain of custody.

I certify that this data package is in compliance with the terms and conditions agreed to by the client and KEMRON Environmental Services, both technically and for completeness, except for the conditions noted above. Release of the data contained in this hardcopy data package has been authorized by the Laboratory Manager or designated person, as verified by the following signature.

REVIEWED: MTLOMON DATE: 11-27-01

REPORT NARRATIVE METALS

KEMRON Login No: L0111369

METHOD

Analysis: SW-846 6010/6020/7000

HOLDING TIMES

Sample Preparation: All holding times were met. Sample Analysis: All holding times were met.

PREPARATION

Sample preparation proceeded normally.

CALIBRATION

Initial calibrations: All acceptance criteria were met.

Alternate Source Standards: All acceptance criteria were met. Continuing Calibration: All acceptance criteria were met.

BATCH QA/QC

Method Blank: All acceptance criteria were met.

Laboratory Control Sample: All acceptance criteria were met

Duplicate: WG108875 - Sample nonhomogeneity was apparent in analysis of duplicate samples L0111369-06 and L0111369-07.

SAMPLES

All acceptance criteria were met.

I certify that this data package is in compliance with the terms and conditions agreed to by the client and KEMRON Environmental Services, both technically and for completeness, except for the conditions noted above. Release of the data contained in this hardcopy data package has been authorized by the Laboratory Manager or designated person, as verified by the following signature.

REVIEWED Maen Belly DATE: 11/28/01

Analyst: ALT

Rev. 6/00

CHAIN OF CUSTODIES

COC No. B _34816

109 Starlite Park Marietta, OH 45750



Phone: 740-373-4071

Fax:

740-373-4835

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01/30/02

ERTIFICATE KEMRON Environmental Services 109 Starlite Park

Maristta, Ohio 45750 Phone: (740) 373-4071

Versar, Inc. Division 35 1900 Frost Road Suite 110 Bristol, PA 19007

Attention: Rich Habrukowich

Login #: L0111367
Report Date: 11/29/01
Work ID: SMALL ARMS RANGE

Date Received: 11/20/01

PO Number:

Account Number: VERSAR-PA-318

SAMPLE IDENTIFICATION

Sample	Sample	Sample	Sample
Number	Description	Number	Description
L0111367-01	SARB-01	L0111367-02	SARB-02
L0111367-03	SARB-03	L0111367-04	SARB-04
L0111367-05	SARB-05	L0111367-06	SARB-06
L0111367-07	SARB-07	L0111367-08	SARB-08
L0111367-09	SARB-09	L0111367-10	SARB-10
L0111367-11	SARB-11	L0111367-12	SARB-12
L0111367-13	SARB-12DUPE	L0111367-14	SARB-13
L0111367-15	SARB-14	L0111367-16	SARB-15

All results on solids/sludges are reported on a dry weight basis, where applicable, unless otherwise specified. This report shall not be reproduced, except in full, without the written approval of KEMRON.

NXSDOH ELAP ID: 10861

Certified By

David L. Bungarner



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109 Starlite Park



L01-11-369

Marietta, OH 45750

CHAIN-OF-CUSTODY RECORD

Phone: 740-373-4071 Fax: 740-373-4835

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ERTIFICATE KEMRON Environmental Services 109 Starlite Park Marietta, Ohio 45750 Phone: (740) 373-4071

Login #: L0111369
Report Date: 11/29/01
Work ID: SMALL ARMS RANGE

Date Received: 11/20/01

Versar, Inc. Division 35 1900 Frost Road Suite 110 Bristol, PA 19007

Attention: Rich Habrukowich

PO Number:

Account Number: VERSAR-PA-318

SAMPLE IDENTIFICATION

Sample	Sample	Sample	Sample	
Number	Description	Number	Description	
L0111369-01 L0111369-03 L0111369-05 L0111369-07 L0111369-11 L0111369-11 L0111369-15	SARS-01 SARS-02DUPE SARS-04 SARS-05DUPB SARS-07 SARS-09 SARS-11 SARS-13	L0111369-02 L0111369-04 L0111369-06 L0111369-08 L0111369-10 L0111369-12 L0111369-14 L0111369-16	SARS-02 SARS-03 SARS-05 SARS-06 SARS-10 SARS-12 SARS-12	

All results on solids/sludges are reported on a dry weight basis, where applicable, unless otherwise specified. This report shall not be reproduced, except in full, without the written approval of KEMRON.

NYSDOH ELAP ID: 10861

Certified By

David L. Bumgarner



ON Environmental Services S	AMPLES RECEIP	DRM			Marietta Lab	oral
CLIENT: VOC-PA DATE:	1/20/01	SHIPPED BY () FED-EX () UPS () RPS	() A () E () U	IRBORNE MERY IS MAIL		<u> </u>
COOLER ID:	COOLER ID:	() KEMROI	N () C	COOLER ID:		<u> </u>
NDEX#: 82/687657129	INDEX#:	<u> </u>		INDEX#:	ana ang asalah Marangan	
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TSR COMMENTS					<u> </u>	
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Revised 10/16/01

Sample Receipt Form #2 Client: VA Project: Date Received:	CRF#4						
Date Received:		•	Sample R	leceipt Form #2			
Date Received:	011 1/0r	QД		D			
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Insufficient sample volumeAir bubbles present in Voa vials (List sample ID)			·.			· .	
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	Insuffic	ient sample vo	olume				
				· ·			
Hold time expired (List sample ID)	Air bub	bles present in	n Voa vials (List s	ample ID)			
Hold time expired (List sample ID)				•			
Hold time expired (List sample 1D)	. Uald ti	no ovninod (T.:	at annuals ID)				
	Hold th	ne expired (Li	ist sample 117)				
TSR:	TSR:						

Company:

Date:

Name of person contacted:

TSR:______Attach: Phone Logs, e-mails, faxes, etc.

VARIANCES

AIR FORCE CENTER FOR ENVIRONMENTAL EXCELLENCE ENVIRONMENTAL RESTORATION SERVICES BROOKS AFB, TX 78235

29 Nov 00

MEMORANDUM FOR HQ AFCEE/ERB

ATTENTION: Roy Willis/RTC/Plattsburg AFB

FROM: Burt Harrison

Environmental Chemistry Consultant

AFCEE/ERC 3207 North Road

Brooks AFB, Tx 78235

SUBJECT: Environmental Chemistry Review of the Kemron Laboratory QAPP Variances Prepared by Versar for the Plattsburg AFB Project.

References: (a) Handbook for the Installation Restoration Program (IRP) - Remedial Investigation/Feasability Studies (RI/FS), AFCEE, Sept. 1993. (b) U.S. EPA Test Methods for Evaluating Solid Wastes (SW 846), third edition, July 1992. (c) HQ AFCEE Quality Assurance Project Plan, March 1998.

A review of the Quality Assurance Project Plan variances for the Plattsburg AFB, NY project prepared by Versar are acceptable with the following exceptions. Recommend sample results be reported on a dry weight basis except for SW5035 samples where it is not possible. Concur with all Reporting Limit variances if approved by the New York State RPM and the USEPA RPM. Do not concur with calibration variances. Do not concur with recovery limits lower than 20% for any analyte for any analytical procedure. Concur with the MDL variance request after a survey of a number of AFCEE laboratories concerning this MDL issue requirement.

If you have any questions regarding this review or these comments, please contact me at (210) 536-5226.

Burt Harrison
Environmental Chemistry Consultant
Consultant Operations Division
AFCEE/ERC



KEMRON Environmental Services, Inc. Variance Request AFCEE QAPP Version 3.0, March 1998 Versar – Plattsburgh, NV Revised 11/20/00

OAPP Section 43 (-MI) L. Spike Lava

APCRE REQUIREMENT:

Item (6) of Section 4.3.1 states "If the spike level in step 2 is more than five times the calculated MDL, repeat the process using a smaller spiking level."

VARIANCE REQUEST:

The laboratory requests a variance to change "five times" to read "ten times".

JUSTIFICATION:

The analytes that fail the "five times" criteria are on those instruments or methods that are very precise and have low relative standard deviations. Any procedure with a relative standard deviation less than 6.67% (at the spiked level) will produce MDLs that do not meet the 'fives times' criteria. Furthermore, this process tends to underestimate the MDL, so repeating the process at a lower spiking level may not produce meaningful data, particularly, if the spike level is below the quantitation limit (lowest calibration standard).

If so desired, the MDLs for those few analytes that fail the "five times" criteria MDL could be assigned a value equal to one-tenth the spike level, or one-half the project required RL, whichever is higher. This will assure that all project DQOs related to the MDLs and RLs will be met.

KEMRON meets the EPA criteria that the spike concentration should not exceed ten times the estimated MDL and AFCEE has accepted this interpretation on previous projects.

CAPP Section \$ 2 - Wei Weight you live New his

AFCEE REQUIREMENT:

Section 8.2 of the AFCEE QAPP V3.0 requires that "A wet weight aliquot of sample equivalent to the method specified dry weight aliquot of sample shall be taken for analysis."

KEMRON VARIANCE REQUEST:

The laboratory requests a variance to allow the method prescribed sample weights to be determined on the "as-received" basis, as specified in SW846.

JUSTIFICATION:

1) Increasing the amount of wet weight changes the sample/solvent ratios, which may significantly reduce the recovery of analytes from the matrix, resulting in poor surrogate recovery and more R flagged data. Altering the sample/solvent reagent ratios is a direct violation of the SW-846 methods.2) Organic extraction methods such as 3540, 3545 and 3550 have a limit on the quantity of sample they can effectively process.

3) The QAPP procedure cannot be applied to samples collected by method 5035 for volatile organic analysis.

CAPP Section 7, L9 | SW6260 Reporting Limits

KEMRON VARIANCE REQUEST:

Reporting limit (RL) variances for the following analytes:

Analyte	AFCEE RL (ug/L)	Proposed RL (ug/L)
1,1,2,2 Tetrachloroethane	0.4	0.8
I, I-Dichloroethane	0.4	0.5
1,2,3-Trichlorobenzene	0.3	
1,2,4-Trichlorobenzene	0.4	2
1,2-Dichlorobenzene	0.3	1
1,2-Dichloropropanc	0.4	0.5
1,3-Dichloropropane	9.4	0.5
1-Chlorohevane	9.5	1
1,4-Dichlorobenzene	0.3	. 1
The Arms of the Ar		

2-Chlorotoluone	0.4	1
Bonzone	0.4	0.5
Brumobenzene	0.3	1
Bromochloromethane	0.4	0.5
Bromodichloromethane	0.8	1
Chlorobenzene	0.4	0.5
Chloroform	0.3	0.5
Bthylbenzene	0.6	1
Methylene Chloride	0.3	. 2
n-propylbenzene	0.4	1.
Naphthalene	0.4	1
Styrene	0.4	1
Trichlorofluoromethane	0.8	· · ·
Dibromochloromethane	0.5	0.6
1,2-Dichleroethane	0.6	0.7
m,p-Xylene		

JUSTIFICATION:

The laboratory low calibration standard is not at the APCEB RL. The proposed RL will meet the project requirements.

AFCEE REQUIREMENT:

Table 7-2.9-1 lists m-Xylene and p-Xylene as separate analytes.

KEMRON VARIANCE REQUEST:

KEMRON requests a variance to report m-Xylene and p-Xylene as one analyte, since the compounds co-clute.

DATES SECTION 72-98 (VSD18 preservation

VARIANCE REQUEST:

KEMRON requests that method 5035 soit preservation be limited to freezing and that the holding time be accepted as 14 days.

JUSTIFICATION:

This variance is needed to prevent the degradation of performance of several (8260) target analytes and the failure of these analytes to meet the QAPP 3.0 quality control requirements for the second source verification and continuing calibration verification (CCV). The analytes most affected by affected by the sodium bisulfate are clorodifluoromethane, chloromethane, vinyl chloride, tromomethane, chloroethane, and trichlorofluromethane. These compounds have a high probability of failing ICV/CCV criteria, resulting in R flags on all samples. Using the freezing option will eliminate these problems. The freezing option and 14-day hold time is being accepted by some states and selected US-EPA regions.

NATIO COOK NOT ON THE LIGHT

VARIANCE REQUEST:

KEMRON requests a variance to change the second source initial calibration verification (ICV) and continuing calibration verification (CCV) enterla from +1-25 % to +1-40% for clorodifluoromethane, chloromethane, vinyl chloride, bromomethane, chloroethane, and trichlorofluromethane.

JUSTIFICATION:

These compounds are very prone to ICV/CCV failure when sodium hisulfate is used as a preservative. Without the variance these compounds will probably have to be R-flagged.

CAPA Section (2.10 SV 6270 Surrogate Course Limit

AFCEE REQUIREMENT:

Table 7.2.10-2 lists the acceptance limit for phenol-D5 as 25-125 % recovery in water.

KEMRON VARIANCE REQUEST:

KBMRON requests a variance to use 10 - 125 % recovery as the acceptance limit in water

JUSTIFICATION:



Phenol recovery above 10% is not achievable routinely due to poor extraction efficiency. Industry-wide statistics do not support the 25 – 125 % recovery limit.

OAPU Bartonist 2 10 SIVB270 AGS Control Finite

AFCEE REQUIREMENT: see table below

VARIANCE REQUEST:

LCS Control Limit variances for \$270 compounds in water:

Compound	AFCEE LCS LIMITS	PROPOSED LCS LIMITS
Phonol	25-125	20-125
2-Chloronaphthalene	60-125	49-120
Hexachlorocyclopentadiene	Delete as a target analyte	
Benzoic Acid	25-162	20-125
3,3'-Dichlorobenzidine	29-175	20-125
Phenol-d5 (surrogate)	25-125	20-125

JUSTIFICATION:

These compounds are industry-wide poor performers and consistently give recoveries below the AFCEE lower control limits. Hexachlorocyclopentadiene has been proposed for deletion as an analyte from the AFCEE 3.1 QAPP. The proposed limits are taken from the AFCEE 3.1 QAPP.

QAPP Section 72:15-1 SW6010B1CP

KEMRON VARIANCE REQUEST:

Reporting limit (RL) variances for the following analytes in water:

Analyte	AFCEE RL (mg/L)	Proposed RL (mg/L)
Zinc	201	0.02
ZIIIC	0.01	0.02

JUSTIFICATION:

The proposed RL will meet the project requirements.

OAPE bestion 7237-07 SWIdon Method Variance - Water

AFCEE REQUIREMENT:

APCEB projects often specify that arsenic, antimony, chromium, cadmium, lead, selenium, thallium and vanadium shall be performed by their respective 7000 - GFAA methods:

Metal	Method	AFCEE RL (mg/L)
Arsenic	7060A	0.005
Chromium	7191	0.005
Cadmium	7131A	0.001
Lond	7421	0.005
Vanadium	7911	0.004
Antimony	7041	0.005
Selenium	7740	0.005
Thallium	7841	0.001
the second secon		

KEMRON VARIANCE REQUEST:



Method Variance:

KEMRON requests a variance to use Method 6010B or 6020A in lieu of the GFAA methods. Analyzing these metals by ICP-ABS or ICP-MS will not elevate the reporting limits, but will eliminate the inherent errors of GFAA methods:

Metal	Method	Proposed RL (mg/L)
Arsenic	6010B/6020A	0.005
Chromium	6010B	0.005
Cadmium	6010B	0.001
Lead	6010B/6020A	0.005
Vanadium	6010B	0.004
Antimony	6020A	0.005
Sclenium	6020A	0.005
Thallium	6020A	0.001

JUSTIFICATION:

The proposed RLs are equal to the 7000 method RLs and meet the project DQOs.

DATES SALDONA 24 1-21 SAV TOOL Martinos Yar lauce - Soil

AFCEE REQUIREMENT:

AFCEE DQOs often specifies that arsenic, antimony, selenium, thallium, chromium, cadmium, lead and vanadium be performed by their respective 7000 - GFAA methods:

KEMRON VARIANCE REQUEST:

Method Variance:

KEMRON requests a variance to use Method 6010B or 6020A in lieu of the GFAA methods. KEMRON will use a method that will meet the project action limits, either by ICP-ABS or ICP-MS. The following RLs are proposed:

	AFCER 7000	Proposed 6010	Proposed 6020A
	RL (mg/kg)	RL (mg/kg)	RL (mg/kg)
Antimony	0.5	1	0.2
Arsenic	0.5	1	0.5
Lead	0.5	1	0.5
Selenium	0.5	1	0.5
Vanadium	0.4	0.5	N/A
Chromium	0.5	0.5	N/A
Cadmium	0.1	0.1	N/A
Thallium	0.1	2	0.1

JUSTIFICATION:

Project DQOs will not be affected, and the inherent errors of GFAA methods will be eliminated.

KEMRON VARIANCE REQUEST:

Reporting limit variance for the following analyte:

CAPPS Section 22 (12/2) N. 1909 Responsing Comits

Analyte	AFCEE RL (mg/kg)	•	Proposed RL (mg/kg)
Thallium	0.1		0.25

JUSTIFICATION:

The laboratory MDL does not support the AFCEE RL. This variance is needed if 7000 methods are required.



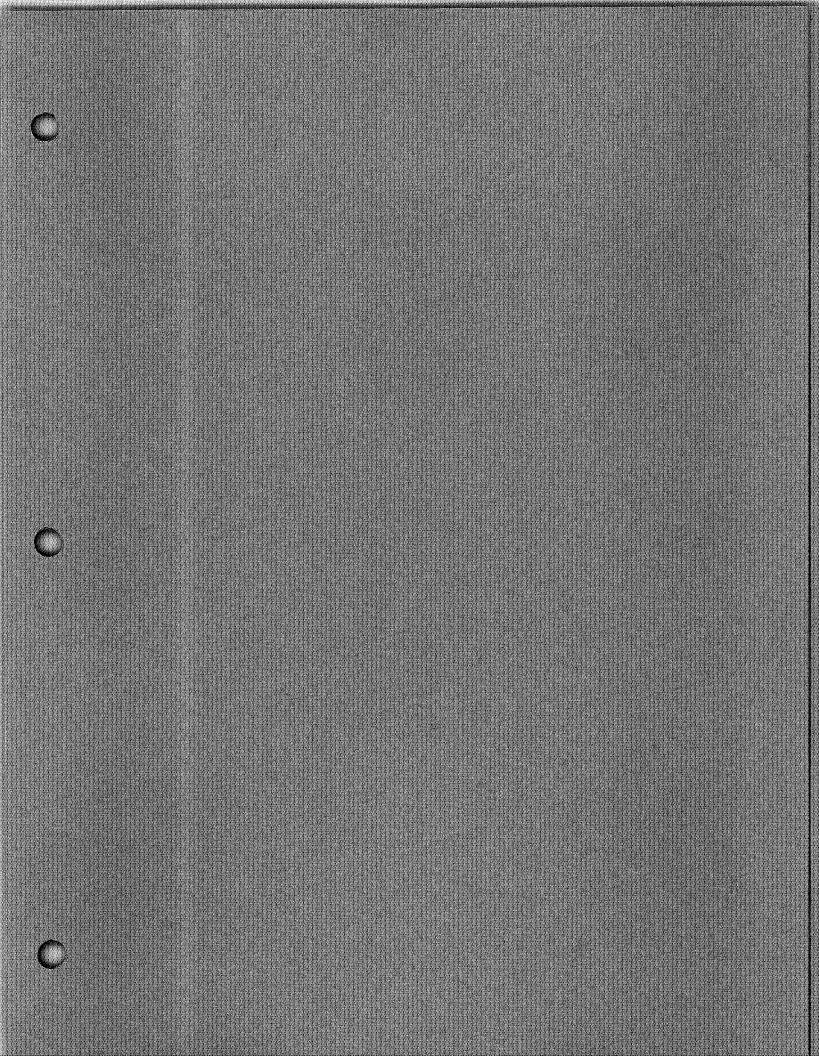
KEMRON VARIANCE REQUEST:

Reporting limit variance for the following analyte:

Analyte	AFCEE RL (mg/L)	Laborea Kr. (mg)
Thallium	0.001	0.005
Antimony	0.005	0.006

JUSTIFICATION:

The laboratory MDLs for the 7000 methods do not support the AFCEE RL. This variance is needed if 7000 methods are required.



MEMORANDUM

TO:

Rich Habrukowich, Versar, Bristol, PA

FROM:

Donna Oswald, Versar, Lombard, IL

DATE:

November 7, 2002

RE:

Data Validation/Usability Report for Plattsburg AFB

Old Small Arms Range, Post Excavation Confirmation Soil Samples

Kemron SDGs L0209256, L0209402, L0209417

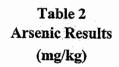
1.0 INTRODUCTION

On September 12, 2002 five post excavation sidewall and bottom confirmation soil samples plus one duplicate sample, were collected at Plattsburgh AFB Old Small Arms Range, Site SS-033 (sidewall: SARS and bottom: SARB) and sent to Kemron Environmental Services (Kemron), located in Marietta, Ohio, for analysis. Samples were analyzed for total arsenic by EPA SW846 Method 6010B. On September 18, 2002 bottom sample location SARB-01 was re-sampled for confirmation purposes after supplemental excavation activities. The receipt temperature of the sample was 7C, therefore on September 23, 2002, sample location SARB-01 was re-sampled. The sample analysis results were reported in Kemron SDGs L0209256 (9/12/02 sampling event), L02090402 (9/18/02 event) and L02090417 (9/23/02 event). Analyses were preformed in accordance with the Air Force Center for Environmental Excellence (AFCEE) Quality Assurance Project Plan (QAPP) Version 3.0 (March 1998) except as noted in the approved variances section. The analytical results are presented in Table 2.

The data were qualified in accordance with the validation protocols in the AFCEE QAPP, Version 3.0 (March 1998). The laboratory performed the initial review of the data package, and qualified the data in accordance with their internal QC requirements. Final qualification of the data was made by the Versar project chemist based on the results of the data validation. The following items were reviewed during the data validation process: chain of custody, sample condition upon receipt, extraction/analysis holding times, method detection/reporting limits, laboratory control sample (LCS) recoveries, initial and continuing calibrations, second source calibration verification standards, laboratory method matrix spike/ matrix spike duplicate (MS/MSD) analysis results, field duplicate precision, field QC blank contamination and report completeness.

The hierarchy of AFCEE qualifiers from most to least severe are as follows; "R" (rejected), "M" (matrix effect present), "F" (results above method detection limit, but below reporting limit), "J" (estimated value), "B" (blank contamination) and "U" (not detected).





Kemron SDG L02-09-256

					SARB-01-2	SARB-01-2A	SARS-04-2	SARB-05-2	SARS-10-2	SARS-11-2
					L0209256-01	L0209256-02	L0209256-03	L0209256-04	L0209256-05	L0209256-06
'	R	RDL MDL TAGM		9/12/2002	9/12/2002	9/12/2002	9/12/2002	9/12/2002	9/12/2002	
					Result Qual ⁽¹⁾	Result Qual(1)	Result Qual ⁽¹⁾	Result Qual ⁽¹⁾	Result Qual(1)	Result Qual ⁽¹⁾
Arseni		5	0.5	7.5	20.1	24.8	1.76 F	1.08 F	1.32 F	0.899 F
% Soli	ds	1	NA	NA	86	83	87	87	91	84
					7					

Kemron SDG L02-09-402

,			,	SARB-01-3
				L0209402-01
	RDL	MDL	TAGM	9/18/2002
				Result Qual ⁽¹⁾
Arsenic	1	0.35	7.5	1.07
% Solids	1	NA	NA	97

Kemron SDG L02-09-417

				SARB-01-3-01
				L0209417-01
	RDL	MDL	TAGM	9/23/2002
				Result Qual ⁽¹⁾
Arsenic	1	0.35	7.5	0.897 F
% Solids	1	NA	NA	97

NOTES:

MDL - Laboratory Method Detection Limit

RL - Reportable Limit

TAGM - Site background or NYSDEC TAGM#4046 Soil Clean-up Objective, Appendix A, Table 4, Column 5.

1) Qualifiers:

F: Result is below the RL and qualitatively acceptable but quantitatively unreliable due to uncertainty in precision near the limit of detection.

The samples were received by Kemron under proper chain-of-custody. The temperatures of the sample coolers upon receipt at the laboratory were 1°C, 7°C and 5°C respectively. Two of the coolers were outside AFCEE QAPP criteria of 4 ± 2 °C, however the sample containers were intact upon receipt and the samples were not impacted. Laboratory log-in records indicate that the coolers contained wet ice upon receipt. EPA does not require soil samples submitted for metal analysis to be shipped under refrigeration.

2.0 VALIDATION

All calibration requirements as summarized in Attachment A were met for all samples. All other QC criteria were met. Several target analytes were detected below the RL but above the MDL. They are considered to be trace levels and were qualified "F" in accordance with the QAPP. F qualified results are considered to be qualitatively acceptable but quantitatively suspect due to poor analytical precision near the limit of detection.

Sample SARB-01-2A was used as the MS/MSD for samples analyzed for Arsenic by method 6010B. QAPP specific criteria for matrix spike accuracy and precision were met. Sample SARB-01-2 was analyzed in duplicate by the laboratory. There is no QAPP requirement for laboratory derived duplicate analyses. Duplicate results were therefore reviewed based on USEPA CLP National Functional Guidelines (NFG) for Inorganic Data Review (EPA-540/R-94-013). Laboratory duplicates are based on replicate sample aliquots obtained from the same sample jar after homogenization in the laboratory and thus are a measure of laboratory variability (including but not limited to that introduced during subsampling, preparation and analysis and due to instrumentation variability). NFG precision criteria of RPD \leq 20% were met.

Samples SARB-01-2 and SARB-01-2A were a field duplicate pair for SDG L0209256 for Arsenic. No criteria for the evaluation of field duplicate results are provided in the QAPP, therefore guidance provided for review of laboratory duplicates in the NFG were used. Matrix spike/matrix spike duplicate relative percent difference (RPD) criteria were used to evaluate results greater than 5 times the reporting limit (RL). Matrix spike RPD criteria serve as a lower estimate of field precision as they do not include variability introduced by field sample collection activities as the sample aliquots are taken from a single jar after homogenization in the laboratory. Results less than 5 times the RL were evaluated against criteria of ± 2 times the RL. Field precision criteria were met for Arsenic in the field duplicate pair submitted in SDG L0209256.

3.0 COMPLETENESS

The AFCEE QAPP goal for completeness is 90% for soil matrixes. Percent completeness is defined as the number of valid results divided by the total number of individual target compound results, Valid results are those that have not been rejected (qualified "R"). The percent completeness was 100% for this event.

ATTACHMENTS

Attachment A

Initial Calibration quality control requirements for reportable analytes

QC requirement	multi- point calib.	Multi- point %RSD or r ² OK	Low standard < PQL	Second Source Standard (SSC)	SSC %D OK
Analytical Method					
6010B	х	X	х	Х	х

Continuing Calibration quality control requirements for reportable analytes

QC requirement	Continuing Calibration Verification Standard (CCV)	CCV %D OK
Analytical Method		
6010B	х	х

CHAIN OF CUSTODIES

COC No. A

21477

Promogenize all composite samples prior to analysis

109 Starlite Park Marietta, OH 45750 Phone: 740-373-4071

Fax: 740-373-4835

KEINRON
ENVIRONMENTAL SERVICES
CHAIN-OF-CUSTODY RECORD

Company Name: Versar Inc Project Contact: Bryan Foleu Turn Around Requirements! Location: 24 hour TAT Project #: 104500-4521-141 Sampler (print): Bryan Foley Project Name: Signature: Bryan Foley Project Name: Project Name: Signature: Project Name: Project Name: Signature: Project Name: Project Name: Project Name: Signature: Project Name: Project Name:										NUMBER OF CONTAINERS														:				Program NPDIES AFCEE RCRA USAGE Other ADDITIONAL REQUIREMENTS		
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COC No. B 105434

109 Starlite Park



Phone: 740-373-4071

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COC No. A 35356

109 Starlite Park



Phone: 740-373-4071

740-373-4835

Marietta, OH 45750 **CHAIN-OF-CUSTODY RECORD** Company Name: VELSAR Program Project Contact: NPDES Contact Phone #: 1/32 **CAFCEE** Turn Argund Requirements: NUMBER OF CONTAINERS Location RCRA USAGE Project/Name: Project #: 164500 4521 441 Other Sampler (print): Signature: **ADDITIONAL** REQUIREMENTS Grab Sample I.D. No. Hold CWA SW846 Date Time SARB-01-3-01 Date Time Received by: Relinquished by: Received by: Relinquished by: (Signature) (Signature) (Signature) (Signature) Relinquished by (Signature) Received for Laboratory by: Cooler Temp In °C Remarks: Time

I lomogenize all composite samples prior to analysis

19:23

FAX 630

268

VERSAR

CASE NARRATIVE

KEMRON ENVIRONMENTAL SERVICES REPORT NARRATIVE

L0209256

CHAIN OF CUSTODY:

The chain of custody number was 21477.

SHIPMENT CONDITIONS:

The chain of custody forms were received sealed in a cooler. The cooler temperature was 1° C.

SAMPLE MANAGEMENT:

All samples received were intact.

I certify that this data package is in compliance with the terms and conditions agreed to by the client and KEMRON Environmental Services, both technically and for completeness, except for the conditions noted above. Release of the data contained in this hardcopy data package has been authorized by the Laboratory Manager or designated person, as verified by the following signature.

REVIEWED: VICKY Laner DATE: 9/13/02

REPORT NARRATIVE METALS

KEMRON Login No: L0209256

METHOD

Analysis: SW-846 6010/6020/7000

HOLDING TIMES

Sample Preparation: All holding times were met. Sample Analysis: All holding times were met.

PREPARATION

Sample preparation proceeded normally.

CALIBRATION

Initial calibrations: All acceptance criteria were met.

Alternate Source Standards: All acceptance criteria were met.

Continuing Calibration: All acceptance criteria were met.

BATCH QA/QC

Method Blank: All acceptance criteria were met.

Laboratory Control Sample: All acceptance criteria were met

SAMPLES

All acceptance criteria were met.

I certify that this data package is in compliance with the terms and conditions agreed to by the client and KEMRON Environmental Services, both technically and for completeness, except for the conditions noted above. Release of the data contained in this hardcopy data package has been authorized by the Laboratory Manager or designated person, as verified by the following signature.

Analyst: JYH

REVIEWED: Name Beerg DATE: 09/18/02

Rev. 6/00

KEMRON ENVIRONMENTAL SERVICES REPORT NARRATIVE

L0209402

CHAIN OF CUSTODY:

The chain of custody number was 105434.

SHIPMENT CONDITIONS:

The chain of custody forms were received sealed in a cooler. The cooler temperature was 7° C.

SAMPLE MANAGEMENT:

All samples received were intact.

All samples were put on hold pending recollection. The arsenic sample was taken off of hold 9-23-02 for priority analysis.

I certify that this data package is in compliance with the terms and conditions agreed to by the client and KEMRON Environmental Services, both technically and for completeness, except for the conditions noted above. Release of the data contained in this hardcopy data package has been authorized by the Laboratory Manager or designated person, as verified by the following signature.

REVIEWED:

DATE: 9.23- >

REPORT NARRATIVE METALS

KEMRON Login No: L0209402

METHOD

Analysis: SW-846 6010/6020/7000

HOLDING TIMES

Sample Preparation: All holding times were met. Sample Analysis: All holding times were met.

PREPARATION

Sample preparation proceeded normally.

CALIBRATION

Initial calibrations: All acceptance criteria were met.

Alternate Source Standards: All acceptance criteria were met.

Continuing Calibration: All acceptance criteria were met.

BATCH QA/QC

Method Blank: All acceptance criteria were met.

Laboratory Control Sample: All acceptance criteria were met

SAMPLES

All acceptance criteria were met.

I certify that this data package is in compliance with the terms and conditions agreed to by the client and KEMRON Environmental Services, both technically and for completeness, except for the conditions noted above. Release of the data contained in this hardcopy data package has been authorized by the Laboratory Manager or designated person, as verified by the following signature.

Analyst: Jyn

REVIEWED: Ashur L. Plakenof DATE: 9/27/02

Rev. 6/00

KEMRON ENVIRONMENTAL SERVICES REPORT NARRATIVE

L0209417

CHAIN OF CUSTODY:

The chain of custody number was 35356.

SHIPMENT CONDITIONS:

The chain of custody forms were received sealed in a cooler. The cooler temperature was 5° C.

SAMPLE MANAGEMENT:

All samples received were intact.

I certify that this data package is in compliance with the terms and conditions agreed to by the client and KEMRON Environmental Services, both technically and for completeness, except for the conditions noted above. Release of the data contained in this hardcopy data package has been authorized by the Laboratory Manager or designated person, as verified by the following signature.

Milling DATE: 9-25-2

REVIEWED:



KEMRON Login No: L0209417

METHOD

Analysis: SW-846 6010/6020/7000

HOLDING TIMES

Sample Preparation: All holding times were met. Sample Analysis: All holding times were met.

PREPARATION

Sample preparation proceeded normally.

CALIBRATION

Initial calibrations: All acceptance criteria were met.

Alternate Source Standards: All acceptance criteria were met.

Continuing Calibration: All acceptance criteria were met.

BATCH QA/QC

Method Blank: All acceptance criteria were met.

Laboratory Control Sample: All acceptance criteria were met

SAMPLES

All acceptance criteria were met.

I certify that this data package is in compliance with the terms and conditions agreed to by the client and KEMRON Environmental Services, both technically and for completeness, except for the conditions noted above. Release of the data contained in this hardcopy data package has been authorized by the Laboratory Manager or designated person, as verified by the following signature.

Analyst: JYH

REVIEWED: Other L. Adaguate: 10/1/02

Rev. 6/00

VARIANCES

AIR FORCE CENTER FOR ENVIRONMENTAL EXCELLENCE ENVIRONMENTAL RESTORATION SERVICES BROOKS AFB, TX 78235

29 Nov 00

MEMORANDUM FOR HQ AFCEE/ERB

ATTENTION: Roy Willis/RTC/Plattsburg AFB

FROM: Burt Harrison

Environmental Chemistry Consultant

AFCEE/ERC 3207 North Road

Brooks AFB, Tx 78235

SUBJECT: Environmental Chemistry Review of the Kemron Laboratory QAPP Variances Prepared by Versar for the Plattsburg AFB Project.

References: (a) Handbook for the Installation Restoration Program (IRP) - Remedial Investigation/Feasability Studies (RI/FS), AFCEE, Sept. 1993. (b) U.S. EPA Test Methods for Evaluating Solid Wastes (SW 846), third edition, July 1992. (c) HQ AFCEE Quality Assurance Project Plan, March 1998.

A review of the Quality Assurance Project Plan variances for the Plattsburg AFB, NY project prepared by Versar are acceptable with the following exceptions. Recommend sample results be reported on a dry weight basis except for SW5035 samples where it is not possible. Concur with all Reporting Limit variances if approved by the New York State RPM and the USEPA RPM. Do not concur with calibration variances. Do not concur with recovery limits lower than 20% for any analyte for any analytical procedure. Concur with the MDL variance request after a survey of a number of AFCEE laboratories concerning this MDL issue requirement.

If you have any questions regarding this review or these comments, please contact me at (210) 536-5226.

Burt Harrison
Environmental Chemistry Consultant
Consultant Operations Division
AFCEE/ERC



KEMRON Environmental Services, Inc. Variance Request AFCEE QAPP Version 3.0, March 1998 Versar – Platisburgh, NY Revised 11/20/00

APCEE REQUIREMENT:

Item (6) of Section 4.3.1 states "If the spike level in step 2 is more than five times the calculated MDL, repeat the process using a smaller spiking level."

VARIANCE REQUEST:

The laboratory requests a variance to change "five times" to read "ten times".

JUSTIFICATION:

The analytes that fail the "five times" criteria are on those instruments or methods that are very precise and have low relative standard deviations.

Any procedure with a relative standard deviation less than 6.67% (at the spiked level) will produce MDLs that do not meet the 'fives times' criteria. Furthermore, this process tends to underestimate the MDL, so repeating the process at a lower spiking level may not produce meaningful data, particularly, if the spike level is below the quantitation limit (lowest calibration standard).

If so desired, the MDLs for those few analyses that fail the "five times" criteria MDL could be assigned a value equal to one-tenth the spike level, or one-half the project required RL, whichever is higher. This will assure that all project DQOs related to the MDLs and RLs will be met.

KEMRON neets the EPA criteria that the spike concentration should not exceed ten times the estimated MDL and AFCEE has accepted this interpretation on previous projects.

CAPES action 82 - New Weath Scill to 5 Verich

AFCEE REQUIREMENT:

Section \$.2 of the AFCEE QAPP V3.0 requires that "A wet weight aliquot of sample equivalent to the method specified dry weight aliquot of sample shall be taken for analysis."

KEMRON VARIANCE REQUEST:

The laboratory requests a variance to allow the method prescribed sample weights to be determined on the "as-received" basis, as specified in SW846.

JUSTIFICATION:

Increasing the amount of vert weight changes the sample/solvent ratios, which may significantly reduce the recovery of analytes from the
matrix, resulting in poor surrogate recovery and more R flagged data. Altering the sample/solvent reagent ratios is a direct violation of the SW846 methods.2) Organic extraction methods such as 3540, 3545 and 3550 have a limit on the quantity of sample they can effectively process.
 The QAPP procedure cannot be applied to samples collected by method 5035 for volatile organic analysis.

KEMRON VARIANCE REQUEST:

Reporting limit (RL) variances for the following analytes:

CAPP Section 7.1.9-1 SWEEDS Reporting Limits

Analyte	AFCEE RL (ug/L)	Proposed RL (ug/L)
1,1.2,2 Tetrachloroethane	0.4	0.8
1,1-Dichloroethane	0,4	0.5
1.2.3-Trichlorobenzene	0.3	i
1,2,4-Trichlorobenzene	0.4	2
1,2-Dichlorobenzenc	0.3	Ī
1,2-Dichloropropana	0.4	0.3
1,3-Dichloropropane	0.4	0.5
1-Chlorohexane	0,5	1
1.4-Dichlorobenzene	0.3	i

2-Chiorotolucne	0.4	3
Benzene	0.4	0.5
Bromobenzese	0.3	t
Bromochloromethane	0.4	0.5
Bromodichloromethane	0.8	1
Chlorobenzeue	0.4	0.5
Chloroform	0.3	0.5
Editylbenzene	0.6	1
Methylene Chloride	0,3	2
n-propy/benzene	0.4	. 1
Naphthalene	0.4	1
Styrene	0.4	J
Trichlorofluoromethane	0.8	1.
Dibromochleremethane	0.5	0.6
1.2-Dichleroethane	0.6	0.7
m n. Yulana	***	1

JUSTIFICATION:

The laboratory low calibration standard is not at the APCEB RL. The proposed RL will meet the project requirements.

AFCEE REQUIREMENT:

Table 7.2.9-1 lists m-Xylene and p-Xylene as separate analyses.

KEMRON VARIANCE REQUEST:

KEMRON requests a variance to report m-Xylene and p-Xylene as one analyse, since the compounds co-clute.

PRODUCT CONTRACTOR

VARIANCE REQUEST:

KEMRON requests that method 5035 soil preservation be limited to freezing and that the holding time be accepted as 14 days.

JUSTIFICATION:

This variance is needed to prevent the degradation of performance of several (\$260) target analytes and the failure of these analytes to meet the QAPP 3.0 quality control requirements for the second source verification and continuing calibration verification (CCV). The analytes most affected by affected by the sodium bisulfate are clorodifluoromethane, chloromethane, vinyl chloride, bromomethane, chlorochane, and trichlorofluromethane. These compounds have a high probability of failing ICV/CCV criteria, resulting in R flags on all samples. Using the freezing option will eliminate these problems. The freezing option and 14-day hold time is being accepted by some states and selected US-EPA regions.

VARIANCE REQUEST:

KEMRON requests a variance to change the second source initial calibration verification (ICV) and continuing calibration verification (CCV) enterta from +/- 25 % to +/- 40% for clorodifluoromethane, chloromethane, vinyl chloride, bromomethane, chloroethane, and trichlorofluoromethane.

JUSTIFICATION:

These compounds are very prone to ICY/CCV failure when sodium hisulfate is used as a preservative. Without the variance these compounds will probably have to be R-flagged.

AFCEE REQUIREMENT:

Table 7.2.10-2 lists the acceptance limit for phenol-D5 as 25-125 % recovery in water.

KEMRON VARIANCE REQUEST:

KEMRON requests a variance to use 10 - 125 % recovery as the acceptance limit in water



JUSTIFICATION:

Phenol recovery above 10% is not achievable routinely due to poor extraction efficiency. Industry-wide statistics do not support the 25 - 125 % recovery limit.

AFCEE REQUIREMENT: see table below

VARIANCE REQUEST:

LCS Control Limit variances for \$270 compounds in water:

Compound	AFCEE LCS LIMITS	PROPOSED LCS LIMITS
Phenol	25-125	20-125
2-Chloronaphthatone	60-125	49-120
Hexachlorocyclopentadiene	Delete as a target analyte	
Benzoic Acid	25-162	20-125
3,3 Dichlorobenzidine	29-175	20-125
Phenol-d5 (surrogate)	25-125	20-125

JUSTIFICATION:

These compounds are industry-wide poor performers and consistently give recoveries below the AFCEE lower control limits. Reachlorocyclopentadiene has been proposed for deletion as an analyte from the AFCEE 3.1 QAPP. The proposed limits are taken from the AFCEE 3.1 QAPP.

CATE SECTION AND SWITCH SERVICE

KEMRON VARIANCE REQUEST:

Reporting limit (RL) variances for the following analytes in water:

Analyte	AFCEE RL (mg/L)	Proposed RL (ing/L)
Ziac	0.01	0.02

JUSTIFICATION:

The proposed RL will meet the project requirements.

CAPE Section 12 17 17 SWidth Steffort Variance, Water

AFCEE REQUIREMENT:

AFCEB projects often specify that arsenic, antimony, chromium, cadmium, lead, selenium, thallium and vanadium shall be performed by their respective 7000 -- CIFAA methods:

Metal	Method	AFCEE RL (mg/L)
Atsenic	7060A	0.005
Chromium	7191	0.005
Cadmium	7131A	0.001
Load	7421	0.005
Vanadium	7911	0.004
Antimony	7041	0.005
Scienium	7740	0.005
Thallium	7841	0.001



KEMRON VARIANCE REQUEST:

Method Variance:

KEMRON requests a variance to use Method 6010B or 6020A in lieu of the GFAA methods. Analyzing these metals by ICP-ABS or ICP-MS will not elevate the reporting limits, but will eliminate the inherent errors of GPAA methods:

Metal	Method	Proposed RL (mg/L)
Arsenic Chromium Cadmium Lead Vanadium	6010B/6020A 6010B 6010B 6010B/6020A 6010B	0.005 0.005 0.001 0.005 0.004
Antimony Selenium Thallium	6020A 6020A 6020A	0.005 0.005

JUSTIFICATION:

The proposed RLs are equal to the 7000 method RLs and meet the project DQOs.

GCRESCOLERS TO TO SECURIO Method Service Scale

AFCEE REQUIREMENT:

AFCEE DQOs often specifies that prsenic, antimony, selenium, thallium, chromium, cadmium, lead and vanadium be performed by their respective 7000 - GFAA methods:

KEMRON VARIANCE REQUEST:

Method Variance:

KEMRON requests a variance to use Method 6010B or 6020A in lieu of the GFAA methods. KEMRON will use a method that will meet the project action limits, either by TCP-ABS or ICP-MS. The following RLs are proposed:

	AFCEE 7000 RL (mg/kg)	Proposed 6010 RL (mg/kg)	Proposed 6020A RL (mg/kg)
Antimony	0.5	1	0.2
Arsenic	0.5	· 1	0,5
Lead	0.5	1	0.5
Selenium	0.5	·	0.5
Vanadium	0.4	0.5	NA
Chronium	. 0.5	0.5	N/A
Cadmium	0.1	0.1	N/A
Thailium	9.1	2	0.1

JUSTIFICATION:

Project DQOs will not be affected, and the inherent errors of GFAA methods will be eliminated.

KEMRON VARIANCE REQUEST:

Reporting limit variance for the following analyte:

Conference (Carlotte Conference C

Analyte	AFCEE RL (mg/kg)	Proposed RL (mg/kg)
Thallium	0.1	0.25

JUSTIFICATION:

The laboratory MDL does not support the AFCEE RL. This variance is needed if 7000 methods are required.

KEMRON VARIANCE REQUEST:

Reporting limit variance for the following analyte:

Analyte

AFCEE RL (mg/L)

Proposed RL (mg/L)

Thallium

0.001

0.005

Antimony

0.005

0.006

JUSTIFICATION:

The laboratory MDLs for the 7000 methods do not support the AFCES RL. This variance is needed if 7000 methods are required.

APPENDIX C

WASTE DISPOSAL CHARACTERIZATION SAMPLE RESULTS



TEST CERTIFICATE KEMRON Environmental Services 109 Starlite Park Marietta, Ohio 45750 Phone: (740) 373-4071

Versar, Inc. Division 35 1900 Frost Road Suite 110 Bristol, PA 19007 Attention: Rich Habrukowich

Login #: L0110388
Report Date: 11/01/01
Work ID: SMALL ARMS RANGE/PLATTSBURGH

Date Received: 10/18/01

PO Number:

Account Number: VERSAR-PA-318

SAMPLE IDENTIFICATION

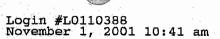
Sample Number Sample Description Sample Number Sample Description L0110388-01 SAR-01

All results on solids/sludges are reported on a dry weight basis, where applicable, unless otherwise specified. This report shall not be reproduced, except in full, without the written approval of KEMRON.

NYSDOH ELAP ID: 10861

Certified By David L. Bumgarner

> #2192 PAGE:



KEMRON ENVIRONMENTAL SERVICES

TCLP METALS

Lab Sample ID: L0110388-01 Client Sample ID: SAR-01 Site/Work ID: SMALL ARMS RANGE/PLATTSBURGH

Matrix: Leachate Collected: 10/17/01 11:00 Units: mg/L

% Solid: 82 COC Info: 18701/ TCLP Ext. Date: 10/18/01

Analyte	Result	Qualifiers	RL	Regula Lim		Prep. Date	Analysis Date	Time	Dil Type
Silver, TCLP Arsenic, TCLP Barium, TCLP Cadmium, TCLP Chromium, TCLP Mercury, TCLP Lead, TCLP Selenium, TCLP	0.25	บ บ บ บ บ	0.10 1.0 0.10 0.10 0.20 0.0002 1.0	5 100 1 5 0.2 5	6010B\3015 6010B\3015 6010B\3015 6010B\3015 6010B\3015 7470A\METHOD 6010B\3015 6010B\3015	10/19/01 10/19/01 10/19/01 10/19/01 10/19/01 10/18/01 10/19/01 10/19/01	10/22/01 10/22/01 10/22/01 10/22/01 10/22/01 10/23/01 10/22/01 10/22/01	11:29 11:29 11:29 11:29 11:29 11:00 11:29	N/A N/A N/A N/A N/A

Lab Sample ID: L0110388-01 Client Sample ID: SAR-01 Site/Work ID: SMALL ARMS RANGE/PLATTSBURGH

Matrix: Soil

Collected: 10/17/01 11:00

% Solid: 82 COC Info: 18701/

Analyte	Units	Result Qualifiers	RL	Dil	Туре	Analysis Analyst Date	Time Method
Percent Solids	weight %	82	1.0	1	N/A	TMM 10/18/01	11:25 D2216-90
Arsenic, Total	mg/kg	34.8	1.0	.82	N/A	SLP 10/22/01	20:05 6010B\3050B &

APPENDIX D

WASTE PROFILE AND DISPOSAL WEIGHT TICKETS



CASELLA WASTE MANAGEMENT, INC.
Special Waste Administration Office
104 River Rend - Alfonso-11. 14ff 03275
Tel. 1603-485-2129 · VT Waste 1800-883-4877 · Pat 1603-485-21292

	SPECIAL WASTE CHAR	ACTERIZATION PR	OFILE
Please indicate destination	Disposal Fo facility and disposal option	soility Location by placing an (X) in th	e appropriate bax below.
Grasslands Compositing P.O. Box 728 Malons, NY 12953 Yel: (\$18) 497-0405 Note: Complete attached "Grasslands Reporting Regularization"	Me. Country Emvironmental Services (NCES) Trudess Road Sethicture, NH 03574 Tel: (603) 868-2368 Faz: (603) 868-2152 Disposal Option: Wheels	New England Warte Services of VT (W-US Airport Road Coventry, VT 05825 Tel: (882) 334-3796 Fzz: 802) 334-2676 Disposal Option: Was	206 Sand Road Morrisonville, NY 12962 Tel: (\$10) \$63-6514 Fax: (\$10) 563-5506 Disposal Option; Wast:
學和學和學學	网络海峡北沟南部 北京市		
ENVIRONMENTAL OF		Phone 757-491-0977	Contact Person LACRY SCHNGIDEC
2) Hauler	Address	Phone	Contact Person
4) Location of Facility General Platts burgh AFB 5) Description of Facility Gene	Plattsburgh N	(12903	Granier small arms range
6) Previous Disposal Location N/A	Address	Plone	Contact Person
7) Total Amount of Weste To B 480 - 500 ton	e Delivered (Tous/Cubic Yards) S & 300 cy		
8) Frequency of Delivery (Regul One-Time Event	les/Periodic/One-Timeij, if regul	ar ar periodic, kon aften?	
9) Method of Delivery (Rull-Off Dump Trailets	Dutap Trailer/Other). If other,	specify.	
10) Description of wante (included Soundly Soul Control	ing density in possible in what gai		1.5 tons/cy

	Waste Char	acterization Dala	
11) is the waste classified a explain.)	s il becordene wante as dell'incel by (ISEPA, or State of origin, or State	where disposed? (If yes,
No			
12) Describe all hazardous	or tainabes bioberies consisted a	ith the waste.	
None			
[3] Does the waste require	say special bandling or disposal pr	ncedures? If so, explain.	•
None			
14) Analytical Data Submit Metalls-TCLP	ind (TCLE/Other). ', % Solids , Total Als	enic	
EPA 1270) and % solids t	essing results for any special weste n	submitted of fell TCLP (Metals-RC) ubmitted for landfill exceptance unless. The gunerator is responsible for	ess the applicant can provide a
to to a roll activities (et boats il est listaed state drok wou	sfound to contain elev	uas previously temediated asked levels of arseni	ied, but the ic above
		FICATION	
I bereity correct roat all information internation. I further excelly that the hands have been obsessed.	a ministed on this form and no employment here is no deliberate or willful sinksions of da	I materials is complete and accurate to the b to becoming to characterist the water spett	est of vey importalize and 1980ly to be most than all become or imported
Signature:	Print name STEVE GRAGNIER	Prior Title ENU, ENGR.	7 Nov 2001
DI	SPOSITION (to be completed	by Casella Waste Manageme	nt, Inc.)
Reachred by:		Date Rowleads	Date Larged los
Behavioral by:		Project Name:	
Submitted to Allebert Vised	liste:	Alichael Visua Approval	Dane:
Submitted to David Admis	Dute:	Devid Adoms Approval	Date
MEDITALIDECUADEC	Duby	MEDERALDRCWADEC VAlue	D=te:
Nonce			
	SUBMIT	UL BATA TO:	
<u>-</u>		mi J. Vinal	•
•		Management for	
•	104 E	irer Rand	
		William D3273	
		1863-4677 • p605-465-2129	

12/95/2001 10:17 5185635598 CLINTON COUNTY PAGE 89

•	·
NEWS OF NEW YORK, INC. CLINTON CTY LANDFILL P.O. Gox 209 MORRISONVILLE NY 12982	Ticket No :000256542 Date :11/27/01
Customer :CON10 CONSOLIDATED ENVIRONMENTAL OPTIONS, INC. 21227 EDGEWOOD COURT SIERLING VA 20155	Order No : Loads : Miles : Tons :
6807 CASELLA/MRTRA 02 CASELLA/LSETRAILER SOILC CONTAMINATED SOILS CLINTON COUNTY, NY Price/th	Gross 74120 lb Scale 1 Inbound 07:40 Tare 32560 lb Scale 1 Outbound 07:52 Net 40560 lb 20.2800 th
DRIVER REMARKS JOHN/PAFB	Material # Delivery \$ Misc \$ Tax # Total \$
	•
NEWS OF NEW YORK. INC. CLINTON CTY LANDFILL P.O. Box 209 MORRISONVILLE NY 12962	Ticket No :000266344 Date :11/27/01
CUSTOMER : CONIN CONSOLIDATED ENVIRONMENTAL OPTIONS, INC. 21227 EDGEWOOD COURT STERLING VA 20165	Order No : Loods : Miles : Tone :
8128 CASELLA/BLKMACK/CRAI 7783 CASELLA/TRAILER SDILC CONTAMINATED SOILS CLINTON COUNTY, NY Price/tn	Bross 81280 lb Scale 1 Inbound 07:38 Tars 37500 lb Scale 1 Outbound 07:55 Net 42580 lb 21.8400 tn
DRIVER CRAIGIPAFE	Material s Delivery s Miss s Tax s Total s

Feb 12 03 05:13p Larry Schneider 12/05/2001 10:17 5185635508

CLINION COUNTY

PAGE 03

er.							i androis	2.55E.A
j	NEWS OF NEW YORK, INC. CLINTON CTY LANDFILL		-		116		No :0002 te :11/2	
	P. C Box 209							
	entre de la companya del companya de la companya del companya de la companya de						<u>.</u>	
	Customer : CONID CONSOLIDATED ENVIRONMENTAL		Ore	der	No 1			
	OPTIONS, INC.				ds :			
	21227 EDGEWOOD COURT STERLING VP 20165				25 : 73 :		· .	
	8128 CASELLA/BLKMACK/CRAI	Grass	965 60	16	Seale	1	Inbound	08:53
	7783 CASELLA/TRAILER SOILC CONTAMINATED SOILS	Tare	37580	16	Scal#	1	Outbound	80:68
	CLINTON COUNTY, NY	Net						
	Price/tn		29.4900	tr.				
	1					eria		
	WEIGH MASTER (LAM)) l Der	iver Mis	•	
	(1, 011				<u> </u>		× \$	
	DRIVER MES Telmes	<u> </u>		_	—¦	Tota	j 2:	
	REMARKS CRAIG/PAFE				<u> </u>			

NEWS OF NEW YORK, INC. CLINTON CTY LANDFILL 2.0. Box 209 MORRISONVILLE NY 12962 Ticket No : 1202256569 Date :11/27/01

Order No : Customer :CON10 COMBOLIDATED ENVIRONMENTAL Loads : OPTIONS. INC. Miles : 21237 EDGEWOOD COURT Топа STERLING VA SALES

8807 CASELLA/MRTRA CASELLA/LSETRAILER **2**2 SOILC CLINTON COUNTY, NY Price/th

84200 lb Scale 1 Inbound 08:56 Gross 1 Outbound 39:12 32860 15 Scale Tara

51340 15 25. £700 tn

| Material | Delivery \$ MIRC 5 WEIGH MASTER (LAM Tak # Total \$ DRIVER REMARKS JOHN/PAFB

Feb 12 03 05:13p Larry Schneider (757) 491-5612 p. 9 -0/05/0001 13:17 516560599A Page 07 CLINTON COUNTY NEWS OF NEW YORK, INC. Ticket No :000266591 CLINTON ETY LANDFILL Date :11/27/01 P.C. Box 205 MORRISONVILLE NY 12962 Customer :CON10 Order No : CONSOLIDATED ENVIRONMENTAL OPTIONS, INC. Loads : 21227 EDGEWOOD COURT Miles : STERLING UP 20165 Tons : **5**128 CASELLA/BLKMACK/CRGI 90720 1b Scale : Intound 10:01 37520 1b Scale : Outbound 10:18 Bross 7763 CASELLA/TRAILER Tare SOILC CONTAMINATED SOILS CLINTON COUNTY, NY 53200 15 Net Price/tn 25.5000 tn ! Material 4 ! Delivery \$ WEIGH MASTER (LAM Misc \$ Tax \$ DRIVER Total \$ REMARKS CPAIG/PAFS X2 NEWS OF NEW YORK, INC. Ticket No : 000266596 CLINTON CTY LANDFILL Date :11/27/01 P. J. Bex 200 MCRPISCHVILLE NY 12962 Customer (CON10) Order No : CONSOLIDATED ENVIRONMENTAL OPTIONS, INC. Loads t E1227 EDGEWOOD COURT Miles : STERLING VA 20165 Tons : 8807 CASELLA/MRTRA 75900 15 Scale 1 Inbound 10:05 Gross 32 CASELLA/LSETRAILER 33760 lb Scale 1 Outbound 10:24 Tare SUILC CONTAMINATED SOILS CLINTON COUNTY, NY Net 42140 16 21.0700 tn Price/to Material \$ Delivery \$ WEIGH MASTER (LAM) Misc \$

DRIVER

REMARKS JOHN/MAROON TRANS

Tax 5

Total \$

12/05/2001 10:1: 5105635599

REMARKS PAFE/JOHN

CLINTON COUNTY

PAGE 36

Ticket No : 200256682 NEWS OF NEW YORK, INC. CLINTON CTY LANDFILL Date :11/27/01 P.D. Box 209 MORRISONVILLE NY 12962 Customer :CON12 Order No : CONSOLIDATED ENVIRONMENTAL OPTIONS, INC. Loads : 21927 EDGEWOOD COURT Miles : STERLING VA 20165 Tons : 6126 CASELLA/BLKMACK/CRAI Gross 83220 Ib Scal 4 1 Inbound 11:10 7763 1 Outbound 11:23 CASELLA/TRAILER Tare 37480 15 Scale SCILC " CONTAMINATED SOILS CLINTON COUNTY. NY 45740 16 Net. Price/tn 22.8700 to | Material & | Delivery \$ WEIGH MASTER Miss F TAX 5 DRIVER Total & REMARKS CRAIS/PAFE NEWS OF NEW YORK, INC. Ticket No : 900255685 CLINTON CTY LANDFILL Date : 11/27/01 P.O. Box 209 MORRISONVILLE NY 12962 Customer : CONID Order No : COMSOLIDATED ENVIRONMENTAL OPTIONS, INC. Loads : 21227 EDGEWOOD COURT Miles : STERLING VA 20163 Tors 8807 CASELLA/MRTRA 77020 15 Scale 1 (nbound 11:12 Grass CASELLA/LSETRAILER 02 ... 1 Outbound 11:25 33920 16 Scale Tare SOILC CONTAMINATED SOILS CLINTON COUNTY, NY 43100 lb Net Price/th. 21,5500 to Muterial \$ Delivery \$ WEIGH MASTER (LAM) Misc \$ Tax 3 RIVER Total \$

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REMARKS JOHN

12/05/2001 10:17 5185605598

NEWS OF NEW YORK, INC. CLINTON CTY LANDFILL P.O. Box 209 MORRISONVILLE NY 18962	Ticket No :000286550 Date :11/27/01
Customer : CON10 CONSOLIDATED ENVIRONMENTAL OPTIONS, INC. 21227 EDGEWOOD COURT SIERLING VA 20165	Order No : Loads : Miles : Tons :
3128 CASELLA/BLKMACK/CRAI 7783 CASELLA/TRAILER SDILC CONTAMINATED SOILS CLINTON COUNTY, NV PRICE/th	Gross 86280 lb Scale 1 Inbound 12:13 Tame 37:460 lb Scale 1 Cutbound 12:23 Net 46860 lb 24.4100 th
BEMARKS CRAIG/BLK TRANSFER	Material # Delivery # Minc # Tax # Total #
NEWS OF NEW YORK, INC. CLINTON CTY LANDFILL P.O. BOX 209 MORRISONVILLE NY 12962	Ticket No 1000255653 Date :11/27/01
Custamer : CONTO CONSOLIDATED ENVIRONMENTAL OPTICNS, INC. 21227 EDGEWOOD COURT STERLING VA 20165	Order No : Lpacs : Milės : Tons :
SANT CASELLA/MRTRA OZ CASELLA/LSETRAILER SOILC CONTAMINATED SOILS CLINTON COUNTY, NY Frice/th	Bross 80400 lb Scale 1 Inbound 12:1 Tare 34560 lb Scale 1 Outbound 12:30 Net 45840 lb 22,9200 tn
DRIVER	Material \$ Delivery \$ Misc \$ Tax \$ Total \$

12.05/2001 10:17 5195635598 CLIMTON DOUNTY

PAGE 94

NEWS OF NEW YORK, INC. CLINTCH CTY LANDFILL F.C. Box 209	Ficket No :000266691 Date :11/27/01
MORRISONVILLE NY 12362	
Customer : CON18 CONSOLIDATED ENVIRONMENTAL	Order No :
CPTICNS, INC. 21227 EDGEWOOD COURT STERLING VA 20165	Loads : Miles : Tons :
9128 CASELLA/SLKMACK/CRAT 7783 CASELLA/TRAILER SOILC CONTAMINATED SOILS	Sress 88160 lb Scale 1 Inbound 13:17 Tara 37520 lb Scale 1 Outbourd 13:36
CLINTON COUNTY, NY Price/to	Net 44640 (b 22.3200 th
	i Material 5 i Delivery 5
WEIGH MASTER (LAM)	M: 4C 5
REMORKS DAFF/CRAIG	
NEWS OF NEW YORK, INC. CLINTON CTY LANDFILL P.O. Box 209 MORRISONVILLE NY 12962	Tiaket No :000266692 Date :11/27/01
Sustamer :CONTO CONSOLIDATED ENVIRONMENTAL	order No :
OPTIONS, INC. 21227 EDGEWOOD COURT STERLING VA 20165	Loads : Miles : Tons :
8807 CASELLA/MRTRA 02 CASELLA/LSETRAILER	Gross 73760 15 Scale 1 ingound 13:20 Tare 34660 15 Scale 1 Outbound 13:30
SOILC CONTAMINATED SOILS CLINTON COUNTY, NY Price/to	Net 39100 1b 19.5500 tn
WEIGH MASTER (LOM)	Material 4 Delivery \$ Misc \$
PRIVER	Tax t Total s
DEMORKS DOER / TOHN	1

12/05/2001 10:17 5195605598

CLINTON COUNTY

PAGE 62

NEWS OF NEW YORK, INC. Ticket No : DODEE6741 CLINTON CTY LANGFILL Date : 11/27/01 C.C. Box 209 MORRISONVILLE NY 12962 Customer (CONIM Order No : CONSOLIDATED ENVIRONMENTAL OFTICNS, INC. Loads : 21247 EDGEWOOD COURT Miles : STERLING VA 20165 Tons 1 8607 CASELLA/MRTRA 1 Inippund 14:35 Gross 71420 15 Scale ઝટ CASELLA/LSETRAILER 1 Outbound 14:53 12700 lb Scale 32.00 B SCILC CONTAMINATED SOILS CLINTON COUNTY, NY 38720 lb Net Frice/th 19.3600 to 1 Marerial \$ 1 Delivery 5 <u>WEIGH MASTER (LAM)</u> Misc 3 Tax 3 DRIVER Total * PEMORKS PAFRAJOHN NEWS OF NEW YORK, INC. Ticket No : 论句句记56743 CLINTON CTY LANDFILL Date :11/27/01 P.O. Box 209 MORRISONVILLE NY 12962 Custoner :CONIO Order No : CONSOLIDATED ENVIRONMENTAL , Loads : OPTIONS, INC. Miles 1 21227 EDGEWOOD COURT STERLING VA 20165 Tons: 81:28 80720 15 Scale 1 Incound 14:34 CASELLA/BLKMACK/CRAI Gr053 37400 15 Scale 1 Outbound 14:55 7783 CASELLA/TRAILER "ara SOILC CONTAMINATED SOILS CLINTON COUNTY, NY Net 43320 lb Pricelta 21.5800 th Material & 1 Dalivary \$ WEIGH MASTER (LAM Misc \$ Tax 1 Total 5 REMARKS PAFB/CRAIG

10/05/2001 10:17 5195605596

CLINTON COUNTY

PASE 92



NEWS OF NEW YORK, INC. CLINTEN GTY LANDFILL P.Q. Box 209 MORRISONVILLE NY LEGER ニーチェントキャ・No. (巡りりご伝らてもす)

Date :::/29/01

Customer :CONIO CONSCLIDATED ENVIRONMENTAL

OFTICMS, INC.

SISE? EDGEWOOD COURT STERLING VA BOIES

Crider No :

Loade, : Milas :

ிற்ற ந

自出でで

CASELLAZMRTRA

Ø2 CASELLA/LSETRAILER SQILC CONTAMINATED SQILS

CLINTON COUNTY, NY

Frich/th

far e e y 73960 (6 Scale | 1 Intound 27:40 Tare 33840 to Scale 1 Outbound 07:52

Net 40120 15

20.2600 76

WEIGH MASTER (LAM

DETVER

NHOLVENER EHROMEN

Material * : Delivery a Magin 4

** A A " .

"otal t

NEW ENGLAND WASTE SERVICES OF NY, INC. CLINTON COUNTY LANDFILL & MRF. 286 SAND RD POB 209 -P(518)563-5514 MORRISONVILLE NY 12962 -F(518)563-5598

TICKET: 122752 DATE: 09/18/2002

TIME: 09:56 - 10:07

This is a Reprint Ticket

CUSTOMER: BC00053 / CONSOLIDATED

P. D. :

HAULCUST:

WO: 0

APPROVAL #:

GROSS: 57640 LBS

ORIGIN: CLI / CLINTON COUNTY

TARE: 36660 LBS

TRUCK: 4118CLIMS

TRAILER:

NET: 20980 LBS

GENERATOR: NA / NON APPLICABLE PROFILE #: NA

HAULER: NS / NORTHERN SANITATI ROUTE: NA / NON APPLICABLE COMMENT: PAFB SUILS

CELL/TANK: P3

MATERIAL

QUANTITY

UNIT

IDSW / ID SPECIAL WASTE

10.4900

ST

small ARMS RANGE 104500.4521.441

I Hereby Declare That I Have NOT Disposed Of Any Liquid Or Mazardous Waste Driver: Weighmaster: B: PCSCALE_CC DUT: LINDA B: PCSCALE_CC IN: LINDA

Consolidated

NEW ENBLAND WASTE SERVICES OF NY, INC. CLINTON COUNTY LANDFILL & MRF 186 SAND RD PDB 209 -P(518)563-5514 MORRISONVILLE NY 12962 -F(518)563-5598

TICKET: 123482 DATE: 09/21/2002 TIME: 09:28 - 09:38

CUSTOMER: BC00053 / CONSOLIDATED

มก. ผ

APPROVAL #:

P.O.: GROSS: 49460 LBS

DRIGIN: CLI / CLINTON COUNTY

.

TARE: 35080 LBS

TRUCK: 283 1

HAULCUST:

TRAILER:

NET: 13380 LBS

GENERATOR: NA / NON APPLICABLE PROFILE #: NA

HAULER: VS / VALLEY SANITATION ROUTE: NA / NON APPLICABLE

COMMENT: PAFB SOIL

CELL/TANK: P3

MATERIAL

QUANTITY

UNIT

IDCS / ID CONTAMINATED SDIL

6.6900 ST

I Hereby Declare That I Have NOT Disposed Of Any Liquid Or Hazardous Waste

Drivers

IN: SLIE

B: PCSCALE_CC

DUT: SUE

-Weighmaster: _

B: POSCALE CO

6034859864

PAGE 03

tax to Mike Vian

CLINTON COUNTY

PAGE 01/02

NEW ENGLAND WASTE SERVICES OF NY, INC.
CLINTON COUNTY LANDFILL & MRF
286 SAND RD POB 209 -P(518)563-5514
MORRISONVILLE NY 18962 -F(518)563-5598

TICKET: 121412 DATE: 09/10/2002 TIME: 14:58 - 15:09

This is a Regrint Ticket

CUSTOMER: BC00053 / CONSOLIDATED P.O.:

MAULCUST: NO: 0 APPROVAL #: 98065: 75520 LBS

ORIGIN: CLI / CLINTON COUNTY TARLER: 36580 LBS

TRUCK: 283 1 TRAILER: NET: 38940 LBS

GENERATOR: NA / NON APPLICABLE PROFILE #1 NA

HAULER: VS / VALLEY SANITATION ROUTE: NA / NON APPLICABLE

COMMENT: PAFB SOILS CELL/TANKI P2

MATERIAL QUANTITY UNIT

I Hereby Declare That I Have NOT Disposed Of Any Liquid Un Hazandous Maste

Drivers _____ Meighasters _____ Weighasters

IN: LINDA

P: PCSCALE_CC

DUT: LINDA

B: PCSCALE_CC

NEW ENGLAND WASTE SERVICES OF NY, INC. CLINTON COUNTY LANDFILL & MRF 286 SAND RD POB 209 -P(518)563-5514 MORRISONVILLE NY 12962 -F (518) 563-5598 TICKET: 121519 DATE: 09/11/2002 TIME: 12:09 - 12:24

CUSTOMER: BC00053 / CONSOLIDATED

12.15

WD: 0

APPROVAL #:

GROSS: 77300 LBS

DRIGIN: CLI / CLINTON COUNTY

TARE: 37320 LBS

P. O. :

NET: 39980 LBS

TRUCK: 283 1

IDSW / ID SPECIAL WASTE

TRAILER:

GENERATOR: NA / NON APPLICABLE PROFILE #: NA

HAULER: VS / VALLEY SANITATION ROUTE: NA / NON APPLICABLE

COMMENT: PAFB SOILS

CELL/TANK: P2

MATERIAL

HAULCUST:

QUANTITY 19.9900

UNIT ST

I Hereby Declare That I Have NOT Disposed Of Any Liquid Or Hatardous Waste

Driver:

Weighmaster:

IN: LINDA

B: PCSCALE_CC OUT: LINDA

B: PCSCALE_CC

NEW ENGLAND WASTE SERVICES OF NY, INC. CLINTON COUNTY LANDFILL & MRF 286 SAND RD POB 209 -P(518)563-5514 MORRISONVILLE NY 12962 -F(518)563-5598

TICKET: 121729 DATE: 09/12/2002 TIME: 12:39 - 12:53

This is a Reprint Ticket

CUSTOMER: BC00053 / CONSOLIDATED

APPROVAL #: WD: 0

GROSS: 72260 LBS

P. O. :

ORIGIN: CLI / CLINTON COUNTY

TARE: 37060 LBS

TRUCK: 283 1

NET: 35200 LBS

TRAILER: GENERATOR: NA / NON APPLICABLE PROFILE #: NA

HAULER: VS / VALLEY SANITATION ROUTE: NA / NON APPLICABLE

COMMENT: PAFB SOIL

CELL/TANK: P2

MATERIAL

HAULCUST:

QUANTITY UNIT

IDSW / ID SPECIAL WASTE

17.6000

ST

I Hereby Declare That I Have NOT Disposed Of Any Liquid Or Hazardoy

Weighmaster:

IN: SUE

B: PCSCALE_CC

1

OUT: SUE

B: PCSCALE CC

PAGE 04

09/27/2002 07:36 17166952241

5ep 18 02 02:54p

Atlantic North

6034859864

p. 5

09/13/2002 14:54 5105635598

CLINTON COUNTY

PAGE 01/01

NEW ENGLAND WASTE SERVICES OF NY, INC. CLINTON COUNTY LANDFILL & MRF. 286 SAND RD POB 209 -P (518) 563-5514 MDRRISONVILLE NY 12962 -F (518) 563-5598 TICKET: 121994 DATE: 09/13/2002 TIME: 14:08 - 14:17

CUSTOMER: BC00053 / CONSOCIDATED HAULCUST:

APPROVAL N: WD: 8

9. U. t GRCSS: 68748 LBS

ORIGIN: CLI / CLINTON COUNTY TRUCK: 283 1

TRAILER:

TARE: 37840 LBS NET: 30900 LBS

GENERATOR: NA / NON APPLICABLE PROFILE #: NA

HAULER: VS / VALLEY SANITATION ROUTE: NA / NON APPLICABLE

COMMENT: PAFE SOIL

CELL/TONK: P2

MATERIAL IDSW / ID SPECIAL WASTE

QUANTITY UNIT 15. 4500 ST

Hereby	Declare That I Have NOT Dis	posed Of Any Lic	quid Or Hazardous Waste
Drivers		Heighwasters	Se
IN: SUE	B: PCSCALE_CC	DUT: SUE	B: PCSCALE_CC

Jan 29 09 08:44a Larry Sohneider (757) 491-5612 p.9

Unc-E4-2002 14:56 From-CASELLA WASTE SYSTEMS INC 11/82/2802 20:15 5185235556

-8127756 SX THE THE HEAT CHILDREN IN

P. G. 1

1-578 4 993/303 4-573 F-MA CUIL-

MEH ENGLAND WASTE SERVICES OF MY, INC. CLINTON COUNTY LANUFILL & MRF. 296 SANC RD POB 209 -P(518)563-5514 MORRISONVILLE NY 12955 - F. (SIA) BER-ASPA

TICKET: 138612 DATE: 11/11/2002 TIME: 05:41 - 09:42

CUSTOMER: BOOGGS / CONSOLIDATED HAULCUST: WC: 0 APPROVAL #: ORIGINE CEI / CLINIUN EDUNTY TRUCK: 292 1 TRALLER GENERATOR: NA / NON APPLICABLE PROFILE 4: NA HOULER: VS / VALLEY SANITATION ROUTE: NA / NON APPLILAME COMMENT: PAFB REPLACES #132387

CELL/TANK: P3

GRD88: 74320 L39

TARE: 3892% LBS

NET: 38498 LBS

MATERIAL CURNTITY TIML ICCS / ID CONTAMINATED SOIL 17. 7000 2.4

I Hereby Doctore That I Have NOT Disposed Of Any Liquid Or Hezerdons Maste Driver: weighnaster: IN: SUE B: PUSCALE_CC QUT: SUE B: PCSCALE_CC

CONSTRUCTION SENT SINED)

DECEN 140

SMALL ARMS RANGE