

# HAZARD EVALUATIONS

HAZARD EVALUATIONS, INC. • 3836 N. BUFFALO ROAD • ORCHARD PARK, NEW YORK 14127  
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November 21, 2006

James A. Atkinson, CFO  
Neville Lumber Co., Inc.  
73 LaSalle Avenue  
Buffalo, New York 14214

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NYSDEC REG 9  
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Re: **Phase II Environmental Site Assessment;**  
Industrial Property; 3774 Lakeshore Road, Hamburg, NY

Dear Mr. Atkinson:

In accordance with our agreement, dated October 17, 2006, Hazard Evaluations, Inc. (HEI) completed a Focused Phase II Environmental Site Assessment (ESA) at the above-referenced (subject) site. Both the ESA and this related letter report were completed on behalf of, and for the use of, Neville Lumber Co., Inc. (the "Client") for its reliance in the environmental assessment of the subject site. Use of this ESA report by any other party is strictly prohibited, except by authorization in writing from the Client.

This focused Phase II ESA was completed to address the potential existence of impacted soil and/or groundwater or other impacted media related to former operations at the subject site, as identified in the HEI Phase I ESA, dated October 2006. The specific conditions of concern include the potential presence of: 1) Impacted soil and or groundwater (including beneath the site structures) related to the potential presence of hazardous substances historically used on the facility; 2) Impacted soil and groundwater related to the presence of USTs containing various substances at the facility; 3) Impacted soil and groundwater along Plant #1 adjacent to the former gasoline station; 4) PCBs on the stained concrete areas within the buildings; 5) Soil or groundwater contamination at the three outfall locations on the Lake Erie shore to determine the potential presence of regulated wastes or hazardous waste characteristics at these locations; 6) Impacted soil or groundwater adjacent to the drainage piping network to determine if contaminants have historically leaked out of the pipes; 7) Contaminants in the area of the Hydrofluoric Acid etching area in Plant #2, the washing area in Plant #1, painting areas, pickling areas, oil misting area, or other process areas of concern to determine if process chemicals or wastes have impacted the subfloor soil through potential subfloor piping releases (if present) or spills; 8) Impacted soils beneath the former hazardous waste storage area containment pad; 9) Contaminants in media contained in various trenches and/or sumps to determine the presence of regulated wastes or hazardous characteristics; 10) Hazardous or other regulated wastes in the "flammables storage" room; and 11) Interior floor drain discharge locations that are not connected to the public sanitary sewer system. HEI's investigative activities and the associated results of this investigation are described in the following paragraphs, and only reflect the conditions of the subject site within the specific areas of concern investigated.

### **Test Trench Installation and Sampling/Analysis**

Prior to performing any on-site activities, underground utilities were located and marked by contacting DIG-Safe New York. On October 18 and 19, 2006, HEI mobilized two tracked excavators (one large and one mini) for the purpose of installing test trenches at various locations across the site. On October 18, 2006, a total of ten test trenches were installed. At each test trench location, the soil/fill material was observed and described. Soil samples were intermittently collected for headspace screening and/or laboratory analysis depending on observations made.

In general, HEI determined that a slag-type material was buried from the existing ground surface to a depth of several feet below grade in some locations. Significant findings observed on October 18, 2006 included an underground storage tank that was suspected to be the former Toluene tank (Test trench MT-1) for the Plant #2 painting system and numerous discarded drums (which contained unspecified materials) in trench ETP-3. Figure 1 (Attachment 1) presents the approximate test trench locations. The solvent tank encountered appeared to be filled with a sand material; however, a strong odor was present in both the sand material within the tank and the soil directly under the tank (which exhibited a headspace VOCs reading of 3,500 ppm). At the request of the property owner's representative, this excavation was left open for observation by its environmental consulting firm and was secured using safety fence and metal stakes. The soil in the vicinity of drums that were encountered in ETP-3 exhibited limited staining and odor, and waste materials from two of the drums exhibited positive VOCs headspace readings (72.9 ppm and 34 ppm). All drums that had been excavated during the test trench installations were staged on the ground surface and secured by surrounding them with caution tape. At the request of the property owner's representative, further investigative activities were postponed for the day; however, with the exception of MT-1, all other test trenches were backfilled with the removed material (excluding any drums) and compacted with the excavator bucket. Attachment 2 presents HEI's Field Notes which present detailed descriptions of the investigative activities.

On October 19, 2006 a total of fifteen additional test trenches were installed. Notable findings for this date included an area of suspect diesel impacted soil in the vicinity of trench ETP-7, which is adjacent to the former marina building, and an additional group of buried crushed drums at trench ETP-14. All of these test trenches were backfilled with the removed materials and compacted with the excavator bucket.

A total of fifteen samples collected during the test trench activities were selected for analysis and placed in appropriate containers which were sealed, labeled and transported under chain-of-custody procedures to the laboratory for analysis. These samples consisted of three drum waste samples, eleven soil/sediment samples, and one water sample. The samples were analyzed using one or more of the following analytical methods; 1) USEPA Method 8260 (VOCs); 2) USEPA Method 8270 (SVOCs); 3) USEPA Method 8082A (PCBs); 4) Metals

(either RCRA and/or TAL); 5) TCLP RCRA Metals; 6) Ignitability; and/or 7) Corrosivity. Attachment 3 presents HEI's Analytical Summary Tables for the specific analyses for the selected samples.

### **Soil Boring Installation and Soil Sampling/Analysis**

On October 31 and November 1, 2006, a direct-push boring rig was mobilized to install soil borings and temporary piezometers across the subject site in an effort to identify the presence of soil and/or groundwater contamination. A total of thirty-two push borings were installed across the subject site (Figure 1). At each boring location, hollow stem sampling probes were used to obtain discrete soil samples at approximately four foot depth intervals to the bottom of each sampling location. The soil/fill encountered at each sampling location was visually described from the discrete samples obtained. Upon collection, each discrete sample was screened for the presence of VOCs using a portable OVM. After all discrete samples for each boring had been collected, the boring was backfilled with the remaining excavated soil/fill and the boring annulus was filled with concrete patch (if applicable).

In general, the soils across the subject site were observed to consist of various types of fill, including substantial apparent slag, which was underlain by a dense layered silt turning to soft weathered shale. Perched water was observed in a limited number of locations. Evident contamination, including the presence of free product, was observed in SB18, with all three soil samples collected from that boring exhibiting headspace VOCs readings greater than 7,000 ppm (Attachment 2).

A total of ten soil/fill samples from the soil boring activities were selected for analysis and placed in appropriate containers which were sealed, labeled and transported under chain-of-custody procedures to the laboratory for analysis. The samples were analyzed using one or more of the following analytical methods; 1) USEPA Method 8260 (VOCs); 2) USEPA Method 8270 (SVOCs); 3) USEPA Method 8082A (PCBs); 4) Metals (either RCRA and/or TAL); 5) TCLP RCRA Metals; 6) Ignitability; and/or 7) Corrosivity. Attachment 3 presents HEI's Analytical Summary Tables for the specific analyses for the selected samples.

### **Groundwater Sampling and Analysis**

Temporary piezometers were installed within soil borings SB2, SB14 and SB17 to facilitate the collection of unfiltered groundwater samples. All samples were collected with disposable polyethylene bailers, placed in appropriate containers and transported to the laboratory for analysis using USEPA Methods 8260 (TCL+STARS VOCs), 8270 (TCL SVOCs), RCRA Metals, PCBs and pH. Additionally, a sample of the water contained in excavation ETP-14 was collected and submitted for the same analyses. The samples were filtered at the laboratory prior to analysis for the metals extraction.

### **Media Sampling and Analysis**

A total of twelve media samples were collected for laboratory analysis, including: 1) Six wipe samples from oil-stained surfaces within Plant #1 which were submitted for PCBs analysis; 2) One sludge sample from a sump within Plant #1

which was submitted for TCLP RCRA Metals, PCBs and Corrosivity analyses; 3) One sludge sample from an exterior manhole adjacent to Plant #2 which was submitted for TCLP RCRA Metals, PCBs, and Corrosivity analyses; and 4) Four paint samples from interior surfaces of the office building which were all submitted for Total Lead analysis. Figure 2 depicts the media sampling locations.

### **Floor Drain Survey**

HEI utilized sewer tracer smoke to determine the discharge location(s) of several on-site floor drains, trenches or other appurtenances in an effort to determine if any on-site dry-wells existed which would necessitate further testing. Several smoke tests were run for drains in Plant #1 which revealed that the majority of the drains in Plant #1 discharge to a manhole along Hoover Road and ultimately to one of the outfalls along the Lake Erie shore behind Plant #2. One drain located in the southeastern portion of Plant #1 apparently discharges to the local sanitary sewer system located along Lakeshore Road. No additional sampling locations were identified through the smoke testing activities. Figure 2 depicts the floor drain survey results.

### **Discussion of Results**

In general, the laboratory analytical results revealed the presence of numerous types of soil and/or groundwater contamination at the subject site, including chlorinated solvents, volatile organic compounds, diesel fuel and heavy metals. The analytical results were compared to the NYSDEC Recommended Soil Cleanup Objectives (RSCOs) as presented in Appendix A of TAGM HWR-94-4046, dated January 24, 1994 (TAGM 4046).

### **Volatile Organic Compounds**

The volatile organic compounds analysis revealed the presence of Target Compounds exceeding the applicable RSCOs in eight of the fourteen soil samples submitted for VOCs analysis. The most notable exceedances included the following: 1,1,1-Trichloroethene [3,980,000 µg/kg (RSCO = 800 µg/kg)] and Toluene [2,600,000 µg/kg (RSCO = 1,500 µg/kg)] in sample SB18 (4'-8'), Naphthalene [31,900 µg/kg (RSCO = 13,000 µg/kg)] in sample the ETP-7 (2.5'), and Toluene [20,300 µg/kg (RSCO = 1,500 µg/kg)] in sample MT-1 (under tank). Other miscellaneous VOCs exceedances were noted in samples collected from SB1 (12'-13.5'), SB10 (8'-10'), SB15 (4'-8'), Drum Waste (A) [ETP-3], and Drums Waste (B) [ETP-3]. Table 1 summarizes the VOCs data (Attachment 3). Attachment 4 presents the Laboratory Analytical Report.

The VOCs detected in the SB18 (4'-8') sample are suspected to be associated with former solvent storage at that location, given the presence of apparent sand tank bedding material encountered in the boring. Compounds detected in the ETP-7 (2.5') sample suggest a former diesel fuel release adjacent to the marina building. Toluene detected in the MT-1 (Under Tank) sample is suspected to be related to the bulk storage of that solvent. The source(s) of the Acetone in the SB1 (12'-13.5'), SB10 (8'-10') and SB15 (4'-8') samples is unknown.

Analysis of groundwater (or perched water) samples revealed the presence target parameters exceeding the applicable NYS Groundwater Standards in two of the four samples submitted (Table 2). The SB2 water sample exhibited the presence of 1,1-Dichloroethane at a concentration of 38.9 µg/l (NYS Groundwater Standard = 5 µg/l). The ETP-14 water sample exhibited the presence of Xylenes at a concentration of 16.6 µg/l (NYS Groundwater Standard = 5 µg/l).

#### Semi-Volatile Organic Compounds

The semi-volatile organic compound analysis revealed the presence of Target Compounds exceeding the applicable RSCOs in five of the sixteen soil samples submitted for the SVOCs analysis (Table 3). In general, several SVOCs exceeded the respective RSCOs in ETP-7 (2.5'), ETP-10 (2'-3') and MT-4 (6'-7.5' Under Drain). Additionally, the compound 2-Methylphenol was detected in both the SB18 (4'-8') and MT-1 (Under Tank) samples at concentrations above the RSCO.

The SVOCs detected in the ETP-7 (2.5') sample are apparently also related to the suspect former diesel fuel release adjacent to the marina building. Those detected in the ETP-10 (2'-3') sample, based on field observations, appear to indicate the presence of asphalt-type products. The compounds in the MT-4 (6'-7.5') sample may be related to the perforated drain pipe in that area, but the source(s) is unknown. Finally, the 2-Methylphenol detected in the SB18 (4'-8') sample may also be related to the former solvent storage at that location.

Analysis of groundwater (or perched water) samples for SVOCs did not reveal the presence of any target parameters exceeding the applicable NYS Groundwater Standards (Table 4).

#### Total & TCLP Metals

The total RCRA metals analysis revealed the presence metal concentrations exceeding Eastern USA Background Levels (as published in TAGM 4046) in twelve of the fifteen soil samples submitted (Table 5). The most notable of these detections included the presence of Chromium [8,140 mg/kg (maximum background = 40 mg/kg)] and Lead [2,750 mg/kg (maximum background = 500 mg/kg)] in Drum Waste (A) [ETP-3]. It should be noted that none of the samples submitted for the TCLP Analysis exhibited metal concentrations exceeding the applicable Hazardous Waste toxicity levels. Two samples were submitted for the metals analysis for the TAL metals list with numerous exceedances of the Eastern USA Background levels being noted in both samples; however, given that the material appeared to consist of slag (likely to have been associated with the Bethlehem Steel operation formerly located just north of the subject site). Such metals levels are not atypical for areas formerly associated with the steel-making operations.

The groundwater sample laboratory analytical results did not reveal the presence of metals exceeding the NYS Groundwater Standards (Table 6).

### PCBs

The laboratory analytical results did not reveal the presence of any PCBs at levels exceeding the Method Detection Limits for the analyses of soil/fill, groundwater, or media samples, with the exception of Wipe Sample #3, which indicated the presence of Aroclor 1260 at a concentration of 1.31 µg/wipe (Table 7). Given that the objective of collecting wipe samples for this investigation was to simply identify the presence or absence of PCBs at the sample locations, the collection method does not allow for determining compliance with the Federal Toxic Substances Control Act (TSCA) standard for unrestricted use of non-porous surfaces which is <10 µg/100 cm<sup>2</sup> [See 40 CFR Part 761.79(b)(3)(i)(A)].

### Corrosivity & Ignitability

The laboratory analytical results did not reveal that any of soil/fill, groundwater or media samples exhibited the characteristic of Corrosivity (Table 8). The laboratory analytical results for the Ignitability revealed that one sample exhibited the characteristic of Ignitability, with the SB18 (8'-12') sample igniting at 47 °C, which indicates that this material, as sampled, must be managed as a hazardous waste due to the characteristic of Ignitability upon its removal.

### Conclusions

The observations and laboratory analytical results for the test trench installation activities revealed the presence of four conditions that are likely to mandate remedial activities. First, the excavation adjacent to the Toluene tank at the southwest corner of Plant #2 exhibited solvent-impacted soil beneath the tank at concentrations exceeding applicable NYSDEC RSCOs. Second, the discarded drums buried in the vicinity of Plant #2 that were encountered at locations ETP-3 and ETP-14 (and likely extending beyond those limits) represent improperly disposed regulated solid wastes that will need to be removed for off-site disposal. Although the waste samples collected from some drums that were analyzed during this ESA did not identify any that would clearly be characterized as hazardous waste, based on other site conditions encountered the potential exists that hazardous wastes could be encountered in other drums that may be uncovered during future remedial activities. Third, limited remediation in the vicinity of MT-4 (6'-7.5') [Under Drain] will need to be performed given that several SVOCs compounds exceeded the applicable RSCOs. Finally, the diesel impacted soil adjacent to the former marina building at location ETP-7 exhibited both nuisance characteristics (i.e. staining & odor) and RSCO exceedances and will require appropriate remediation. Given the objectives and limitations of this ESA, the lateral and vertical extents of these impacted areas have not been defined.

The observations and laboratory analytical results for the soil boring installation activities revealed the presence of two additional conditions that are likely to mandate remedial activities. First, soil exhibiting high levels of VOCs was detected at boring location SB18 adjacent to Plant #1 near Hoover Road. HEI suspects that a former solvent UST may have existed in this location due to the sand bedding material encountered in the boring. A NYSDEC determination will need to be obtained to determine if remedial wastes related to this area of concern



are considered hazardous, especially given that the soil sample submitted from this boring location exhibited a hazardous characteristic for Ignitability. It should be noted that once the impacted material is removed from the ground it may no longer exhibit this characteristic; however, other hazardous waste codes may apply related to waste lists, etc. Second, the soil/fill in the location of SB15, which was installed adjacent to a rumored waste disposal vault located in the Plant #1 building, exhibited nuisance characteristics, although NYSDEC RSCOs were not exceeded for the sample collected from this boring.

The media sampling results revealed only one issue of potential concern, with one PCB Aroclor (1260) being detected in Wipe Sample #3 at a concentration of 1.31 µg/wipe. This sample collected on the concrete floor underneath an electrical appurtenance. As stated above, given that the objective of collecting wipe samples for this investigation was to simply identify the presence or absence of PCBs at the sample locations, the collection method does not allow for determining compliance with the Federal Toxic Substances Control Act (TSCA) standard for unrestricted use of non-porous surfaces which is <10 µg/100 cm<sup>2</sup> [See 40 CFR Part 761.79(b)(3)(i)(A)]. HEI recommends removal and disposal of the stained concrete surface in this area as a precautionary measure given the relatively small area that it encompasses.

A limited number of target parameters were detected in groundwater/perched water at the subject site. Given the overall absence of shallow groundwater at the subject site, HEI does not currently anticipate the need for any groundwater remediation at the subject site; however, limited treatment of perched water may be necessary during UST or drum removal activities, and further investigative or remedial activities may reveal that the underlying water table may have been impacted at some location on-site.

### **Summary**

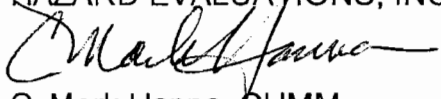
Based on data and information obtained during this Focused Phase II ESA, soil contamination and buried regulated wastes were encountered within several areas of this large former industrial site. The levels of some parameters detected indicate that several segregated, but significant, sources of contamination are likely, especially for the Toluene and 1,1,1-Trichloroethane identified adjacent to Plant #1, the Toluene identified adjacent to Plant #2, and the apparent diesel release adjacent to the marina building. In addition, a limited number of buried drums, some still containing limited amounts of unknown waste materials, were identified southwest of Plant #2. The possibility also exists that additional on-site investigative or remedial activities may reveal other areas of contamination either under the floor of the buildings or just outside the walls of the buildings where process wastes may have been released on a small scale through poor management practices.

HEI suggests that the conditions encountered within the areas of concern at the subject site represent historic releases that appear to be reportable to the NYSDEC Region 9 office by the current site owner. However, even if the reporting requirement is not triggered, the conditions encountered as described above appear

to warrant at least limited excavation and removal remedial procedures to be completed by the owner/operator of the subject site. Concern exists with respect to whether some contaminants may have migrated off-site to the north or west into Lake Erie, and if so, to what extent. HEI recommends that if the Client still considers pursuing the purchase of the subject site, contact with the NYSDEC Region 9 office should be made to explore Brownfields Cleanup Program options for remediation in accordance with the proposed 6 NYCRR Part 375 regulations set to become effective during January 2007, as participation in such a program may provide significant tax incentives associated with the remediation of the property. One additional concern related to this site contamination that may need to be addressed is the potential applicability of the Financial Accounting Standards Board (FASB) Interpretation No. 47 (March 2005) of Financial Accounting Standard 143 that addresses the potential liability of potential and existing environmental management costs.

The information presented above should adequately summarize HEI's investigative efforts and results regarding the various environmental concerns at the subject site. If you have any questions regarding the contents of this letter report, please contact me directly.

Very truly yours,  
HAZARD EVALUATIONS, INC.



C. Mark Hanna, CHMM  
President

**Attachments**

EA#35Neville P2 1106 Rpt



**Table 1**  
**Selected Soil Sample Analytical Results; TCL & STARS Volatile Organics**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB1 (12'-13.5')	SB2 (8'-10') & (0'-4')	SB3 (4'-6')	SB10 (8'-10')	SB15 (4'-8')	SB18 (8'-12')	Drum Waste (A) (ETP-3)	Drum Waste (B) (ETP-3)	Recommended Soil Cleanup Objective (TAGM 4046)
Bromodichloromethane	"	"	"	"	"	"	"	"	NA
Bromomethane	"	"	"	"	"	"	"	"	NA
Bromoform	"	"	"	"	"	"	"	"	NA
Carbon Tetrachloride	"	"	"	"	"	"	"	"	600
Chloroethane	"	"	"	"	"	"	"	"	1,900
Chloromethane	"	"	"	"	"	"	"	"	NA
2-Chloroethyl vinyl ether	"	"	"	"	"	"	"	"	NA
Chloroform	17.2	"	9.75	"	"	"	"	"	300
Dibromochloromethane	"	"	"	"	"	"	"	"	NA
1,1-Dichloroethane	"	"	"	"	"	"	"	"	200
1,2-Dichloroethane	"	"	"	"	"	"	"	"	100
1,1-Dichloroethene	"	"	"	"	"	"	"	"	400
Cis-1,2-Dichloroethene	"	"	"	"	"	"	"	"	NA
Trans-1,2-Dichloroethene	"	"	"	"	"	"	"	"	300
1,2-Dichloropropane	"	"	"	"	"	"	"	"	NA
Cis-1,3-Dichloropropene	"	"	"	"	"	"	"	"	300
Trans-1,3-Dichloropropene	"	"	"	"	"	"	"	"	300
Methylene Chloride	"	"	"	"	"	"	"	"	100
1,1,2,2-Tetrachloroethane	"	"	"	"	"	"	"	"	600
Tetrachloroethene	"	"	"	"	"	"	"	"	1,400
1,1,1-Trichloroethane	11.5	"	"	"	"	3,980,000	"	"	800
1,1,2-Trichloroethane	"	"	"	"	"	"	"	"	NA
Trichloroethene	"	"	"	"	"	"	"	"	700
Trichlorofluoromethane	"	"	"	"	"	"	"	"	NA
Vinyl Chloride	"	"	"	"	"	"	"	"	200
Benzene	"	"	"	"	"	"	"	"	60

Notes: 1) Results from USEPA Method 8260 for Volatiles; All results in ppb (ug/kg).  
2) NA = Not Applicable  
3) " means compound not detected above Method Detection Limit (MDL).

**Table 1 (continued)**  
**Selected Soil Sample Analytical Results; TCL & STARS Volatile Organics**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB1 (12'-13.5')	SB2 (8'-10') & (0'-4')	SB3 (4'-6')	SB10 (8'-10')	SB15 (4'-8')	SB18 (8'-12')	Drum Waste (A) (ETP-3)	Drum Waste (B) (ETP-3)	Recommended Soil Cleanup Objective (TAGM 4046)
Chlorobenzene	"	"	"	"	"	"	"	"	1,700
Ethylbenzene	"	"	"	"	"	"	"	276	5,500
Toluene	19.0	"	"	"	"	2,600,000	1,800	445	1,500
Xylenes	"	"	"	"	"	"	"	2,557	1,200
Styrene	36.1	"	"	"	"	"	"	"	NA
1,2-Dichlorobenzene	"	"	"	"	"	"	"	"	7,900
1,3-Dichlorobenzene	"	"	"	"	"	"	"	"	1,600
1,4-Dichlorobenzene	"	"	"	"	"	"	"	"	8,500
Acetone	310	"	92.4	544	261	"	"	1,170	200
2-Butanone	"	"	"	"	"	"	"	"	300
2-Hexanone	"	"	"	"	"	"	"	"	NA
4-Methyl-2-pentanone	"	"	"	"	"	"	"	"	1,000
Carbon Disulfide	"	"	"	"	"	"	"	"	2,700
Vinyl acetate	"	"	"	"	"	"	"	"	NA
n-Butylbenzene	"	"	"	"	"	"	"	"	10,000
sec-Butylbenzene	"	"	"	"	"	"	240	"	10,000
tert-Butylbenzene	"	"	"	"	"	"	"	"	10,000
n-Propylbenzene	"	"	"	"	"	"	1,020	"	3,700
Isopropylbenzene	"	"	"	"	"	"	704	"	2,300
p-Isopropyltoluene	"	"	"	"	"	"	"	"	10,000
Napthalene	"	"	"	"	"	"	"	"	13,000
1,2,4-Trimethylbenzene	"	"	"	"	"	"	"	450	10,000
1,3,5-Trimethylbenzene	"	"	"	"	"	"	"	155	3,300
Methyl tert-butyl Ether	"	"	"	"	"	"	"	"	120
Top 20 TICs	3,405	253	220	28.3	193	"	21,359	1,349	10,000

Notes: 1) Results from USEPA Method 8260 for Volatiles; All results in ppb (ug/kg).  
2) NA = Not Applicable  
3) " means compound not detected above Method Detection Limit (MDL).

**Table 1 (continued)**  
**Selected Soil Sample Analytical Results; TCL & STARS Volatile Organics**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	Drum Waste (C) (ETP-3)	Below Drums (#6) (ETP-3)	ETP-7 (2.5')	ETP-14 (Under Drums)	MT-1 (Under Tank)	MT-4 (6'-7.5') Under Drum	MT-6 (3'-6')	MT-8 (3'-6')	Recommended Soil Cleanup Objective (TAGM 4046)
Bromodichloromethane	"	"	"	"	"	"	"	"	NA
Bromomethane	"	"	"	"	"	"	"	"	NA
Bromoform	"	"	"	"	"	"	"	"	NA
Carbon Tetrachloride	"	"	"	"	"	"	"	"	600
Chloroethane	"	"	"	"	"	"	"	"	1,900
Chloromethane	"	"	"	"	"	"	"	"	NA
2-Chloroethyl vinyl ether	"	"	"	"	"	"	"	"	NA
Chloroform	"	"	"	"	"	"	"	"	300
Dibromochloromethane	"	"	"	"	"	"	"	"	NA
1,1-Dichloroethane	"	"	"	"	"	"	"	"	200
1,2-Dichloroethane	"	"	"	"	"	"	"	"	100
1,1-Dichloroethene	"	"	"	"	"	"	"	"	400
Cis-1,2-Dichloroethene	"	"	"	"	"	"	"	"	NA
Trans-1,2-Dichloroethene	"	"	"	"	"	"	"	"	300
1,2-Dichloropropane	"	"	"	"	"	"	"	"	NA
Cis-1,3-Dichloropropene	"	"	"	"	"	"	"	"	300
Trans-1,3-Dichloropropene	"	"	"	"	"	"	"	"	300
Methylene Chloride	"	"	"	"	"	"	"	"	100
1,1,2,2-Tetrachloroethane	"	"	"	"	"	"	"	"	600
Tetrachloroethene	"	"	"	"	"	"	"	"	1,400
1,1,1-Trichloroethane	"	"	"	"	"	"	"	"	800
1,1,2-Trichloroethane	"	"	"	"	"	"	"	"	NA
Trichloroethene	"	"	"	"	"	"	"	"	700
Trichlorofluoromethane	"	"	"	"	"	"	"	"	NA
Vinyl Chloride	"	"	"	"	"	"	"	"	200
Benzene	"	"	"	"	"	"	"	20.7	60

Notes: 1) Results from USEPA Method 8260 for Volatiles; All results in ppb (ug/kg).  
2) NA = Not Applicable  
3) " means compound not detected above Method Detection Limit (MDL).

**Table 1 (continued)**  
**Selected Soil Sample Analytical Results; TCL & STARS Volatile Organics**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	Drum Waste (C) (ETP-3)	Below Drums (±6') (ETP-3)	ETP-7 (2.5')	ETP-14 (Under Drums)	MT-1 (Under Tank)	MT-4 (6'-7.5') Under Drum	MT-6 (3'-6')	MT-8 (3'-6')	Recommended Soil Cleanup Objective (TAGM 4046)
Chlorobenzene	"	"	"	"	"	"	"	"	1,700
Ethylbenzene	"	"	"	"	"	"	"	"	5,500
Toluene	22.1	"	"	"	20,300	20.2	"	"	1,500
Xylenes	"	"	270	"	"	"	"	"	1,200
Styrene	"	"	"	"	"	"	"	"	NA
1,2-Dichlorobenzene	"	"	"	"	"	"	"	"	7,900
1,3-Dichlorobenzene	"	"	"	"	"	"	"	"	1,600
1,4-Dichlorobenzene	"	"	"	"	"	"	"	"	8,500
Acetone	"	"	"	"	"	"	"	"	200
2-Butanone	"	"	"	"	"	"	"	"	300
2-Hexanone	"	"	"	"	"	"	"	"	NA
4-Methyl-2-pentanone	"	"	"	"	"	"	"	"	1,000
Carbon Disulfide	62.1	"	"	"	"	"	"	"	2,700
Vinyl acetate	"	"	"	"	"	"	"	"	NA
n-Butylbenzene	"	"	3,070	"	"	"	"	"	10,000
sec-Butylbenzene	"	"	2,190	"	"	"	"	"	10,000
tert-Butylbenzene	"	"	"	"	"	"	"	"	10,000
n-Propylbenzene	"	"	1,790	"	"	"	"	"	3,700
Isopropylbenzene	"	"	647	"	"	"	"	"	2,300
p-Isopropyltoluene	"	"	600	"	"	"	"	"	10,000
Naphthalene	"	"	31,900	"	"	"	"	"	13,000
1,2,4-Trimethylbenzene	"	"	6,650	"	"	"	"	"	10,000
1,3,5-Trimethylbenzene	"	"	1,830	"	"	"	"	"	3,300
Methyl tert-butyl Ether	"	"	"	"	"	"	"	"	120
Top 20 TICs	"	"	221,850	"	"	"	"	692.2	10,000

Notes: 1) Results from USEPA Method 8260 for Volatiles; All results in ppb (ug/kg).  
2) NA = Not Applicable  
3) " means compound not detected above Method Detection Limit (MDL).

**Table 2**  
**Groundwater Sample Analytical Results; TCL & STARS Volatile Organics**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 19 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB2	SB14	SB17	ETP-14	Water Quality Standards (See note)
Bromodichloromethane	"	"	"	"	5*
Bromomethane	"	"	"	"	5*
Bromoform	"	"	"	"	5*
Carbon Tetrachloride	"	"	"	"	5
Chloroethane	"	"	"	"	50
Chloromethane	"	"	"	"	5*
2-Chloroethyl vinyl Ether	"	"	"	"	5*
Chloroform	"	"	"	"	7
Dibromochloromethane	"	"	"	"	5
1,1-Dichloroethane	38.9	"	"	"	5
1,2-Dichloroethane	"	"	"	"	5
1,1-Dichloroethene	"	"	"	"	5
Cis-1,2-Dichloroethene	"	"	"	"	5
Trans-1,2-Dichloroethene	"	"	"	"	5
1,2-Dichloropropane	"	"	"	"	1
Cis-1,3-Dichloropropene	"	"	"	"	5
Trans-1,3-Dichloropropene	"	"	"	"	5
Methylene Chloride	"	"	"	"	5
1,1,2,2-Tetrachloroethane	"	"	"	"	5
Tetrachloroethene	"	"	"	"	5
1,1,1-Trichloroethane	4.62	"	"	"	5
1,1,2-Trichloroethane	"	"	"	"	1
Trichloroethene	"	"	"	"	5
Trichlorofluoromethane	"	"	"	"	5*
Vinyl Chloride	"	"	"	"	2
Benzene	"	"	"	"	1.0
Chlorobenzene	"	"	"	"	5
Ethylbenzene	"	"	"	3.00	5
Toluene	"	"	"	"	5
Xylenes	"	"	"	16.6	5
Styrene	"	"	"	"	5*
1,2-Dichlorobenzene	"	"	"	"	3
1,3-Dichlorobenzene	"	"	"	"	3
1,4-Dichlorobenzene	"	"	"	"	3
Acetone	"	"	"	"	50
2-Butanone	"	"	"	"	50
2-Hexanone	"	"	"	"	5*
4-Methyl-2-pentanone	"	"	"	"	50
Carbon Disulfide	"	"	"	"	50
Vinyl Acetate	"	"	"	"	5*

Notes: 1) Results from USEPA Method 8260 for Volatiles; All results in ppb (ug/l).  
2) " means compound not detected above MDL.  
3) Water Quality Standards from either TOGS 1.1.1 or TAGM 4046.  
4) \* means assumed POC.

**Table 2 (continued)**  
**Groundwater Sample Analytical Results; TCL & STARS Volatile Organics**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 19 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB2	SB14	SB17	ETP-14	Water Quality Standards (See note)
n-Butylbenzene	"	"	"	"	5*
Sec-Butylbenzene	"	"	"	"	5*
Tert-Butylbenzene	"	"	"	"	5*
n-Propylbenzene	"	"	"	"	5
Isopropylbenzene	"	"	"	"	50
p-Isopropylbenzene	"	"	"	"	5*
Naphthalene	"	"	"	"	5*
1,2,4-Trimethylbenzene	"	"	"	"	7
1,3,5-Trimethylbenzene	"	"	"	"	5
Methyl tert-butyl Ether	"	"	"	"	5
Top 20 TICs	5.41	"	"	"	NA

Notes: 1) Results from USEPA Method 8260 for Volatiles; All results in ppb (ug/l).  
2) " means compound not detected above MDL.  
3) Water Quality Standards from either TOGS 1.1.1 or TAGM 4046.  
4) \* means assumed POC.

**Table 3**  
**Selected Soil Sample Analytical Results; Semi-volatile Organics**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB2 (8'-10') & (0'-4')	SB3 (4'-6')	SB10 (8'-10')	SB15 (4'-8')	SB18 (4'-8')	Drum Waste (A) (ETP-3)	Drum Waste (B) (ETP-3)	Drum Waste (C) (ETP-3)	Recommended Soil Cleanup Objective (TAGM 4046)
Acenaphthene	"	"	"	"	"	"	"	"	50,000
Anthracene	"	"	"	"	"	"	"	"	50,000
Benzo(a)anthracene	"	"	"	"	"	"	"	"	224 or MDL
Benzo(a)pyrene	"	"	"	"	"	"	"	"	61 or MDL
Benzo(b)fluoranthene	"	"	"	"	"	"	"	"	1,100
Benzo(g,h,i)perylene	"	"	"	"	"	"	"	"	50,000
Benzo(k)fluoranthene	"	"	"	"	"	"	"	"	1,100
Chrysene	"	"	"	"	"	"	"	"	400
Diethylphthalate	"	"	"	"	"	"	"	"	NA
Dimethylphthalate	"	"	"	"	"	"	"	"	2,000
Butylbenzylphthalate	"	"	"	"	"	"	"	"	50,000
Di-n-butylphthalate	"	"	"	"	"	"	"	"	8,100
Di-n-octylphthalate	"	"	"	"	"	"	"	"	50,000
bis(2-Ethylhexyl)phthalate	"	"	"	"	579	1,280	"	990	50,000
2-Chloronaphthalene	"	"	"	"	"	"	"	"	NA
Hexachlorobenzene	"	"	"	"	"	"	"	"	410
Hexachloroethane	"	"	"	"	"	"	"	"	NA
Hexachlorocyclopentadiene	"	"	"	"	"	"	"	"	NA
Hexachlorobutadiene	"	"	"	"	"	"	"	"	NA
n-Nitrosodipropylamine	"	"	"	"	"	"	"	"	NA
n-Nitrosodiphenylamine	"	"	"	"	"	"	"	"	NA
n-Nitrosodimethylamine	"	"	"	"	"	"	"	"	NA
Isophorone	"	"	"	"	"	"	"	"	4,400
Benzyl alcohol	"	"	"	"	"	"	"	"	NA
Dibenzofuran	"	"	"	"	"	"	"	"	6,200
2-Methylnaphthalene	"	"	"	"	"	602	"	"	36,400
Dibenzo(a,h)anthracene	"	"	"	"	"	"	"	"	14 or MDL

Notes: 1) Results from USEPA Method 8270 for Semi-volatiles; All results in ppb (ug/kg).

2) Shaded results indicates concentration exceeds RSCO.

3) NA means Not Applicable.

4) MDL means Method Detection Limit.

5) " means compound not detected above MDL.



**Table 3 (continued)**  
**Selected Soil Sample Analytical Results; Semi-volatile Organics**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB2 (8-10') & (0'-4')	SB3 (4'-6')	SB10 (8'-10')	SB15 (4'-8')	SB18 (4'-8')	Drum Waste (A) (ETP-3)	Drum Waste (B) (ETP-3)	Drum Waste (C) (ETP-3)	Recommended Soil Cleanup Objective (TAGM 4046)
Fluoranthene	"	"	"	"	"	"	"	"	50,000
Fluorene	"	"	"	"	"	"	"	"	50,000
Indeno(1,2,3-cd)pyrene	"	"	"	"	"	"	"	"	NA
Naphthalene	"	"	"	"	"	1,620	"	"	13,000
Phenanthrene	"	"	"	"	"	705	"	"	50,000
Pyrene	"	"	"	"	"	475	"	"	50,000
Acenaphthylene	"	"	"	"	"	"	"	"	41,000
1,2-Dichlorobenzene	"	"	"	"	"	"	"	"	7,900
1,3-Dichlorobenzene	"	"	"	"	"	"	"	"	1,600
1,4-Dichlorobenzene	"	"	"	"	"	"	"	"	8,500
1,2,4-Trichlorobenzene	"	"	"	"	"	"	"	"	3,400
Nitrobenzene	"	"	"	"	"	"	"	"	200 or MDL
2,4-Dinitrotoluene	"	"	"	"	"	"	"	"	NA
2,6-Dinitrotoluene	"	"	"	"	"	"	"	"	1,000
bis(2-Chloroethyl)ether	"	"	"	"	"	"	"	"	NA
bis(2-Chloroisopropyl)ether	"	"	"	"	"	"	"	"	NA
bis(2-chloroethoxy)methane	"	"	"	"	"	"	"	"	NA
4-Bromophenylphenylether	"	"	"	"	"	"	"	"	NA
4-Chlorophenylphenylether	"	"	"	"	"	"	"	"	NA
Benzidine	"	"	"	"	"	"	"	"	NA
3,3-Dichlorobenzidine	"	"	"	"	"	"	"	"	NA
4-Chloroaniline	"	"	"	"	"	"	"	"	220 or MDL
2-Nitroaniline	"	"	"	"	"	"	"	"	430 or MDL
3-Nitroaniline	"	"	"	"	"	"	"	"	500 or MDL
4-Nitroaniline	"	"	"	"	"	"	"	"	NA

Notes: 1) Results from USEPA Method 8270 for Semi-volatiles; All results in ppb (ug/kg).  
2) Shaded results indicates concentration exceeds RSCO.  
3) NA means Not Applicable.  
4) MDL means Method Detection Limit.  
5) " means compound not detected above MDL.

**Table 3 (continued)**  
**Selected Soil Sample Analytical Results; Semi-volatile Organics**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB2 (8'-10') & (0'-4')	SB3 (4'-6')	SB10 (8'-10')	SB15 (4'-8')	SB18 (4'-8')	Drum Waste (A) (ETP-3)	Drum Waste (B) (ETP-3)	Drum Waste (C) (ETP-3)	Recommended Soil Cleanup Objective (TAGM 4046)
Phenol	"	"	"	"	"	"	"	"	30 or MDL
2-Chlorophenol	"	"	"	"	"	"	"	"	800
2,4-Dichlorophenol	"	"	"	"	"	"	"	"	400
2,6-Dichlorophenol	"	"	"	"	"	"	"	"	NA
2,4,5-Trichlorophenol	"	"	"	"	"	"	"	"	100
2,4,6-Trichlorophenol	"	"	"	"	"	"	"	"	NA
Pentachlorophenol	"	"	"	"	"	"	"	"	1,000 or MDL
4-Chloro-3-methylphenol	"	"	"	"	"	"	"	"	240 or MDL
2-Methylphenol	"	"	"	"	455	"	"	"	100 or MDL
4-Methylphenol	"	"	"	"	"	"	"	"	900
2,4-Dimethylphenol	"	"	"	"	"	"	"	"	Na
2-Nitrophenol	"	"	"	"	"	"	"	"	330 or MDL
4-Nitrophenol	"	"	"	"	"	"	"	"	100 or MDL
2,4-Dinitrophenol	"	"	"	"	"	"	"	"	200 or MDL
4,6-Dinitro-2-methylphenol	"	"	"	"	"	"	"	"	NA
Benzoic acid	"	"	"	"	"	"	"	"	NA
Top 20 TICs	9,013	15,621	12,550	16,248	14,830	134,380	19,530	53,730	500,000

Notes: 1) Results from USEPA Method 8270 for Semi-volatiles. All results in ppb (ug/kg).  
2) Shaded results indicates concentration exceeds RSCO.  
3) NA means Not Applicable.  
4) MDL means Method Detection Limit.  
5) " means compound not detected above MDL.

**Table 3 (continued)**  
**Selected Soil Sample Analytical Results; Semi-volatile Organics**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	Below Drums (±6) (ETP-3)	ETP-7 (2.5')	ETP-10 (2'-3')	ETP-14 (Under Drums)	MT-1 (Under Tank)	MT-4 (6'-7.5') Under Drain	MT-6 (3'-6')	MT-8 (3'-6')	Recommended Soil Cleanup Objective (TAGM 4046)
Acenaphthene	"	2,340	15,300	"	"	"	"	"	50,000
Anthracene	"	"	11,700	"	"	5,230	"	"	50,000
Benzo(a)anthracene	"	1,810	5,030	"	"	9,270	"	"	224 or MDL
Benzo(a)pyrene	"	2,110	3,070	"	"	6,750	"	"	61 or MDL
Benzo(b)fluoranthene	"	"	3,340	"	"	6,040	"	"	1,100
Benzo(g,h,i)perylene	"	2,030	2,460	"	"	4,610	"	"	50,000
Benzo(k)fluoranthene	"	"	1,860	"	"	5,310	"	"	1,100
Chrysene	"	1,770	4,930	"	"	9,550	"	"	400
Diethylphthalate	"	"	"	"	"	"	"	"	NA
Dimethylphthalate	"	"	"	"	"	"	"	"	2,000
Butylbenzylphthalate	"	"	"	"	"	"	"	"	50,000
Di-n-butylphthalate	"	"	"	"	"	"	"	"	8,100
Di-n-octylphthalate	"	"	"	"	"	"	"	"	50,000
bis(2-Ethylhexyl)phthalate	525	"	"	"	"	"	"	"	50,000
2-Chloronaphthalene	"	"	"	"	"	"	"	"	NA
Hexachlorobenzene	"	"	"	"	"	"	"	"	410
Hexachloroethane	"	"	"	"	"	"	"	"	NA
Hexachlorocyclopentadiene	"	"	"	"	"	"	"	"	NA
Hexachlorobutadiene	"	"	"	"	"	"	"	"	NA
n-Nitrosodipropylamine	"	"	"	"	"	"	"	"	NA
n-Nitrosodiphenylamine	"	"	"	"	"	"	"	"	NA
n-Nitrosodimethylamine	"	"	"	"	"	"	"	"	NA
Isophorone	"	"	"	"	"	"	"	"	4,400
Benzyl alcohol	"	"	"	"	"	"	"	"	NA
Dibenzofuran	"	3,280	25,700	"	"	"	"	"	6,200
2-Methylnaphthalene	"	3,400	"	"	"	"	"	"	36,400
Dibenzo(a,h)anthracene	"	"	"	"	"	2,330	"	"	14 or MDL

- Notes: 1) Results from USEPA Method 8270 for Semi-volatiles. All results in ppb (ug/kg).  
2) Shaded results indicates concentration exceeds RSCO.  
3) NA means Not Applicable.  
4) MDL means Method Detection Limit.  
5) " means compound not detected above MDL.

**Table 3 (continued)**  
**Selected Soil Sample Analytical Results; Semi-volatile Organics**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	Below Drums (#6) (ETP-3)	ETP-7 (2.5')	ETP-10 (2'-3')	ETP-14 (Under Drums)	MT-1 (Under Tank)	MT-4 (6'-7.5') Under Drain	MT-6 (3'-6')	MT-8 (3'-6')	Recommended Soil Cleanup Objective (TAGM 4046)
Fluoranthene	"	4,940	32,300	"	695	33,000	"	"	50,000
Fluorene	"	5,920	27,300	"	"	2,020	"	"	50,000
Indeno(1,2,3-cd)pyrene	"	1,850	2,380	"	"	4,480	"	"	NA
Naphthalene	"	20,000	"	"	"	"	"	"	13,000
Phenanthrene	"	15,300	18,500	"	471	18,000	"	"	50,000
Pyrene	"	4,700	19,400	"	534	18,400	"	"	50,000
Acenaphthylene	"	"	"	"	"	2,070	"	"	41,000
1,2-Dichlorobenzene	"	"	"	"	"	"	"	"	7,900
1,3-Dichlorobenzene	"	"	"	"	"	"	"	"	1,600
1,4-Dichlorobenzene	"	"	"	"	"	"	"	"	8,500
1,2,4-Trichlorobenzene	"	"	"	"	"	"	"	"	3,400
Nitrobenzene	"	"	"	"	"	"	"	"	200 or MDL
2,4-Dinitrotoluene	"	"	"	"	"	"	"	"	NA
2,6-Dinitrotoluene	"	"	"	"	"	"	"	"	1,000
bis(2-Chloroethyl)ether	"	"	"	"	"	"	"	"	NA
bis(2-Chloroisopropyl)ether	"	"	"	"	"	"	"	"	NA
bis(2-chloroethoxy)methane	"	"	"	"	"	"	"	"	NA
4-Bromophenylphenylether	"	"	"	"	"	"	"	"	NA
4-Chlorophenylphenylether	"	"	"	"	"	"	"	"	NA
Benzidine	"	"	"	"	"	"	"	"	NA
3,3-Dichlorobenzidine	"	"	"	"	"	"	"	"	NA
4-Chloroaniline	"	"	"	"	"	"	"	"	220 or MDL
2-Nitroaniline	"	"	"	"	"	"	"	"	430 or MDL
3-Nitroaniline	"	"	"	"	"	"	"	"	500 or MDL
4-Nitroaniline	"	"	"	"	"	"	"	"	NA

Notes: 1) Results from USEPA Method 8270 for Semi-volatiles: All results in ppb (ug/kg).  
2) Shaded results indicates concentration exceeds RSCO.  
3) NA means Not Applicable.  
4) MDL means Method Detection Limit.  
5) " means compound not detected above MDL.

**Table 3 (continued)**  
**Selected Soil Sample Analytical Results; Semi-volatile Organics**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	Below Drums (#6') (ETP-3)	ETP-7' (2'-5')	ETP-10' (2'-3')	ETP-14' (Under Drums)	MT-1' (Under Tank)	MT-4' (6'-7.5') Under Drain	MT-6' (3'-6')	MT-8' (3'-6')	Recommended Soil Cleanup Objective (TAGM 4046)
Phenol	"	"	"	"	"	"	"	"	30 or MDL
2-Chlorophenol	"	"	"	"	"	"	"	"	800
2,4-Dichlorophenol	"	"	"	"	"	"	"	"	400
2,6-Dichlorophenol	"	"	"	"	"	"	"	"	NA
2,4,5-Trichlorophenol	"	"	"	"	"	"	"	"	100
2,4,6-Trichlorophenol	"	"	"	"	"	"	"	"	NA
Pentachlorophenol	"	"	"	"	"	"	"	"	1,000 or MDL
4-Chloro-3-methylphenol	"	"	"	"	"	"	"	"	240 or MDL
2-Methylphenol	"	"	"	"	647	"	"	"	100 or MDL
4-Methylphenol	"	"	"	"	"	"	"	"	900
2,4-Dimethylphenol	"	"	"	"	"	"	"	"	Na
2-Nitrophenol	"	"	"	"	"	"	"	"	330 or MDL
4-Nitrophenol	"	"	"	"	"	"	"	"	100 or MDL
2,4-Dinitrophenol	"	"	"	"	"	"	"	"	200 or MDL
4,6-Dinitro-2-methylphenol	"	"	"	"	"	"	"	"	NA
Benzoic acid	"	"	"	"	"	"	"	"	NA
Top 20 TICs	4,155	298,420	22,920	2,090	31,570	11,450	1,613	25,386	500,000

Notes: 1) Results from USEPA Method 8270 for Semi-volatiles. All results in ppb (ug/kg).  
2) Shaded results indicates concentration exceeds RSCO.  
3) NA means Not Applicable.  
4) MDL means Method Detection Limit.  
5) " means compound not detected above MDL.

**Table 4**  
**Groundwater Sample Analytical Results; Semi-Volatile Organics**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 19 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB2	SB14	SB17	ETP-14	Water Quality Standards (see notes)
Acenaphthene	"	"	"	"	20
Anthracene	"	"	"	"	50
Benzo(a)anthracene	"	"	"	"	0.002
Benzo(a)pyrene	"	"	"	"	0.002
Benzo(b)fluoranthene	"	"	"	"	0.002
Benzo(ghi)perylene	"	"	"	"	5
Benzo(k)fluoranthene	"	"	"	"	0.002
Chrysene	"	"	"	"	0.002
Diethylphthalate	"	"	"	"	50
Dimethylphthalate	"	"	"	"	50
Butyl benzyl phthalate	"	"	"	"	50
Di-n-butylphthalate	"	"	"	"	50
Di-n-octylphthalate	"	"	"	"	50
Bis(2-ethylhexyl)phthalate	"	"	"	"	5
2-Chloronaphthalene	"	"	"	"	10
Hexachlorobenzene	"	"	"	"	0.04
Hexachloroethane	"	"	"	"	5
Hexachlorocyclopentadiene	"	"	"	"	5
Hexachlorobutadiene	"	"	"	"	0.5
N-Nitrosodipropylamine	"	"	"	"	NA
N-Nitrosodiphenylamine	"	"	"	"	1
N-Nitrosodimethylamine	"	"	"	"	1
Isophorone	"	"	"	"	50
Benzyl Alcohol	"	"	"	"	NA
Dibenzofuran	"	"	"	"	5
2-Methylnaphthalene	"	"	"	"	5*
Dibenzo(a,h)anthracene	"	"	"	"	50
Fluoranthene	"	"	"	"	50
Fluorene	"	"	"	"	50
Indeno(1,2,3-cd)pyrene	"	"	"	"	0.002
Naphthalene	"	"	"	"	10
Phenanthrene	"	"	"	"	50
Pyrene	"	"	"	"	50

Notes: 1) Results from USEPA Method 8270 for SVOCs; All results in ppb (ug/l).  
2) NA means Not Applicable.  
3) " means compound not detected above MDL.  
4) Water Quality Standards from either TOGS 1.1.1 or TAGM 4046.  
5) \* = Assumed NYSDEC POC which, if verified, would have a standard of 5 µg/l.

**Table 4 (continued)**  
**Groundwater Sample Analytical Results; Semi-Volatile Organics**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 19 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB2	SB14	SB17	ETP-14	Water Quality Standards (see notes)
Acenaphthylene	"	"	"	"	20
1,2-Dichlorobenzene	"	"	"	"	3
1,3-Dichlorobenzene	"	"	"	"	3
1,4-Dichlorobenzene	"	"	"	"	3
1,2,4-Trichlorobenzene	"	"	"	"	5
Nitrobenzene	"	"	"	"	0.4
2,4-Dinitrotoluene	"	"	"	"	5
2,6-Dinitrotoluene	"	"	"	"	5
Bis(2-chloroethyl)ether	"	"	"	"	1
bis(2-Chloroisopropyl)ether	"	"	"	"	NA
Bis(2-chloroethoxy)methane	"	"	"	"	5
4-Bromophenyl phenyl ether	"	"	"	"	NA
4-Chlorophenyl phenyl ether	"	"	"	"	NA
Benzidine	"	"	"	"	NA
3,3'-Dichlorobenzidine	"	"	"	"	5
4-Chloroaniline	"	"	"	"	5
2-Nitroaniline	"	"	"	"	5
3-Nitroaniline	"	"	"	"	5
4-Nitroaniline	"	"	"	"	5
Phenol	"	"	"	"	1
2-Chlorophenol	"	"	"	"	1
2,4-Dichlorophenol	"	"	"	"	1
2,6-Dichlorophenol	"	"	"	"	1
2,4,5-Trichlorophenol	"	"	"	"	1
2,4,6-Trichlorophenol	"	"	"	"	1
Pentachlorophenol	"	"	"	"	1
4-Chloro-3-methylphenol	"	"	"	"	50
2-Methylphenol	"	"	"	"	5
4-Methylphenol	"	"	"	"	50
2,4-Dimethylphenol	"	"	"	"	1
2-Nitrophenol	"	"	"	"	5
4-Nitrophenol	"	"	"	"	5
2,4-Dinitrophenol	"	"	"	"	1
4,6-Dinitro-2-methylphenol	"	"	"	"	NA
Benzoic acid	"	"	"	"	NA
Top 20 TICs	"	"	"	10.6	NA

- Notes: 1) Results from USEPA Method 8270 for SVOCs; All results in ppb (ug/l).  
2) NA means Not Applicable.  
3) " means compound not detected above MDL.  
4) Water Quality Standards from either TOGS 1.1.1 or TAGM 4046.  
5) \* = Assumed NYSDEC POC which, if verified, would have a standard of 5 µg/l.



**Table 5**  
**Soil Sample Analytical Results; RCRA Metals (Total)**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB2 (8'-10') & (0'-4')	SB10 (8'-10')	SB13 (0'-4')	SB15 (4'-8')	SB18 (4'-8')	SB22 (4'-12')	Eastern USA Background Levels (TAGM 4046)
Arsenic	9.45	6.36	4.00	6.11	6.78	27.7	3-12*
Barium	54.7	46.8	226	39.7	20.4	178	15-600
Cadmium	"	3.36	"	2.15	"	11.0	0.1-1.0
Chromium	12.8	14.7	20.9	30.5	13.7	202	1.5-40
Lead	17.7	16.7	4.49	22.6	13.1	695	200-500
Mercury	"	0.0414	"	"	"	"	0.001-0.2
Selenium	"	"	4.43	"	"	"	0.1-3.9
Silver	"	"	2.09	"	"	3.60	NA

Analytical Parameter	Drum Waste (A) (ETP-3)	Drum Waste (B) (ETP-3)	Drum Waste (C) (ETP-3)	Under Drums (±6') (EPT-3)	EPT-14 Under Drums	MT-1 Under Tank	MT-4 (6'-7.5') Under Drain	MT-6 (3'-6')	MT-8 (3'-6')	Eastern USA Background Levels (TAGM 4046)
Arsenic	5.85	9.44	6.12	21.0	6.54	11.1	23.5	6.98	8.35	3-12*
Barium	212	91.2	84.9	92.3	58.4	72.5	152	107	112	15-600
Cadmium	3.52	1.80	1.64	1.33	"	1.41	4.63	5.64	1.31	0.1-1.0
Chromium	8140	54.0	47.2	82.8	15.3	42.9	70.7	20.3	39.5	1.5-40
Lead	2750	77.4	51.0	102	57.0	63.7	323	64.9	260	200-500
Mercury	0.0324	"	"	"	"	"	"	"	0.0922	0.001-0.2
Selenium	"	"	"	"	"	"	"	"	"	0.1-3.9
Silver	15.1	5.31	7.69	3.04	1.51	3.85	7.40	4.39	3.07	NA

Notes: 1) All results and Standards expressed in mg/kg.  
2) " means compound not detected above MDL  
3) Shaded results indicates concentration exceeds the TAGM 4046 Standard.

**Table 5 (continued)**  
**Soil Sample Analytical Results; RCRA Metals (TCLP)**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB2 (8'-10') & (0'-4')	SB13 (0'-4')	SB15 (4'-8')	SB18 (4'-8')	SB22 (4'-12')	Plant #1 Sump Pits	Plant #2 Manhole (Exterior)	Drum Waste (A) (ETP-3)	Drum Waste (B) (ETP-3)	Hazardous Toxicity Level 6 NYCRR 371
Arsenic	"	"	"	"	"	"	"	"	"	5.0
Barium	0.250	0.238	"	0.343	0.354	"	"	1.84	1.31	100.0
Cadmium	"	"	"	"	0.357	"	"	"	"	1.0
Chromium	"	0.053	"	"	"	"	"	0.126	"	5.0
Lead	"	"	"	"	0.767	"	"	"	"	5.0
Mercury	"	"	"	"	"	"	"	"	"	0.2
Selenium	"	"	"	"	"	"	"	"	"	1.0
Silver	"	"	"	"	"	"	"	"	"	5.0

Analytical Parameter	Drum Waste (C) (ETP-3)	Under Drums (± 6') (EPT-3)	ETP-1 (1') Reddish Fill	EPT-14 Under Drums	MT-1 Under Tank	MT-3 (4'-8') Slug	MT-4 (6'-7.5') Under Drain	MT-6 (3'-6')	MT-8 (3'-6')	Hazardous Toxicity Level 6 NYCRR 371
Arsenic	"	"	"	"	"	"	"	"	"	5.0
Barium	1.95	1.58	1.23	1.64	1.90	1.45	1.42	1.59	1.76	100.0
Cadmium	"	"	"	"	"	0.043	"	"	"	1.0
Chromium	"	"	"	"	"	"	"	"	"	5.0
Lead	"	"	"	"	"	"	"	"	"	5.0
Mercury	"	"	"	"	"	"	"	"	"	0.2
Selenium	"	"	"	"	"	"	"	"	"	1.0
Silver	"	"	"	"	"	"	"	"	"	5.0

Notes: 1) All results and Standards expressed in mg/l.  
2) " means compound not detected above MDL.

**Table 5 (continued)**  
**Soil Sample Analytical Results; TAL Metals**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	ETP-1 (1') Reddish Fill	MT-3 (4'-8') Slag	Eastern USA Background Levels (TAGM 4046)
Aluminum	8,570	10,500	33,000
Antimony	20.2	12.5	NA
Arsenic	41.0	29.3	3 - 12
Barium	101	173	15-600
Beryllium	0.915	1.07	0 - 1.75
Cadmium	10.6	19.5	0.1 - 1
Calcium	55,900	39,500	130 - 35,000
Chromium	235	245	1.5 - 40
Cobalt	13.7	11.7	2.5 - 60
Copper	160	190	1 - 50
Iron	239,000	116,000	2,000 - 550,000
Lead	311	453	500 (Metropolitan)
Magnesium	14,100	9,120	100 - 5,000
Manganese	8,270	3,050	50 - 5,000
Mercury	0.6497	0.858	0.001 - 0.2
Nickel	113	58.5	0.5 - 25
Potassium	1,010	2,100	8,500 - 43,000
Selenium	"	"	0.1 - 3.9
Silver	18.2	9.52	NA
Sodium	192	496	6,000 - 8,000
Thallium	"	"	NA
Vanadium	103	28.8	1 - 300
Zinc	1,930	3,080	9 - 50

Notes: 1) All results and Standards expressed in mg/kg.  
2) " means compound not detected above MDL  
3) Shaded results indicates concentration exceeds the TAGM 4046 Standard.

**Table 6**  
**Groundwater Sample Analytical Results; RCRA Metals - Filtered**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 19 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB2	SB14	SB17	ETP-14	6NYCCR 703.6 Groundwater Standards
Arsenic	7	6	6	7	25
Barium	90	178	479	86	1,000
Cadmium	"	"	"	"	5
Chromium	"	"	22	11	50
Lead	5	5	9	"	25
Mercury	"	"	"	"	0.7
Selenium	"	"	"	"	10
Silver	"	"	"	"	50

Notes: 1) All results and Standards expressed in µg/l.

2) " means compound not detected above MDL

3) Shaded results indicate concentration exceeds the NYCCR Title 6, Part 703.6 Groundwater Standards.

**Table 7**  
**Soil Sample Analytical Results; PCBs**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB2 (8'-10') & (0'-4')	SB10 (8'-10')	SB15 (4'-8')	SB18 (4'-8')	Plant #1 Sump Pits	Plant #2 Manhole Exterior	Recommended Soil Cleanup Objective (TAGM 4046)
Aroclor 1016	"	"	"	"	"	"	1.0
Aroclor 1221	"	"	"	"	"	"	1.0
Aroclor 1232	"	"	"	"	"	"	1.0
Aroclor 1242	"	"	"	"	"	"	1.0
Aroclor 1248	"	"	"	"	"	"	1.0
Aroclor 1254	"	"	"	"	"	"	1.0
Aroclor 1260	"	"	"	"	"	"	1.0
<b>Total PCBs</b>	"	"	"	"	"	"	1.0

Analytical Parameter	Drum Waste (A) (ETP-3)	Drum Waste (B) (ETP-3)	Drum Waste (C) (ETP-3)	Below Drums (±6') (ETP-3)	ETP-10 (2'-3')	ETP-14 (Under Drums)	Recommended Soil Cleanup Objective (TAGM 4046)
Aroclor 1016	"	"	"	"	"	"	1.0
Aroclor 1221	"	"	"	"	"	"	1.0
Aroclor 1232	"	"	"	"	"	"	1.0
Aroclor 1242	"	"	"	"	"	"	1.0
Aroclor 1248	"	"	"	"	"	"	1.0
Aroclor 1254	"	"	"	"	"	"	1.0
Aroclor 1260	"	"	"	"	"	"	1.0
<b>Total PCBs</b>	"	"	"	"	"	"	1.0

Analytical Parameter	MT-1 (Under Tank)	MT-3 (4'-8') Slag	MT-4 (6'-7.5') Under Drain	MT-6 (3'-6')	MT-8 (3'-6')	Recommended Soil Cleanup Objective (TAGM 4046)
Aroclor 1016	"	"	"	"	"	1.0
Aroclor 1221	"	"	"	"	"	1.0
Aroclor 1232	"	"	"	"	"	1.0
Aroclor 1242	"	"	"	"	"	1.0
Aroclor 1248	"	"	"	"	"	1.0
Aroclor 1254	"	"	"	"	"	1.0
Aroclor 1260	"	"	"	"	"	1.0
<b>Total PCBs</b>	"	"	"	"	"	1.0

Notes: 1) Results from USEPA Method 8082 PCBs; All results in ppm (mg/kg).  
2) " means compound not detected above MDL.  
3) Shaded results indicates concentration exceeds the TAGM 4046 Standard.

**Table 7 (continued)**  
**Groundwater Sample Analytical Results; PCBs**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 19 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB2	SB14	SB17	ETP-14	Recommended Soil Cleanup Objective (TAGM 4046)
Aroclor 1016	"	"	"	"	1.0
Aroclor 1221	"	"	"	"	1.0
Aroclor 1232	"	"	"	"	1.0
Aroclor 1242	"	"	"	"	1.0
Aroclor 1248	"	"	"	"	1.0
Aroclor 1254	"	"	"	"	1.0
Aroclor 1260	"	"	"	"	1.0
<b>Total PCBs</b>	"	"	"	"	1.0

**Table 7 (continued)**  
**Wipe Sample Analytical Results; PCBs**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 31, 2006 Sampling Date**

Analytical Parameter	Wipe 1	Wipe 2	Wipe 3	Wipe 4	Wipe 5	Wipe 6	Recommended Soil Cleanup Objective (TAGM 4046)
Aroclor 1016	"	"	"	"	"	"	NA
Aroclor 1221	"	"	"	"	"	"	NA
Aroclor 1232	"	"	"	"	"	"	NA
Aroclor 1242	"	"	"	"	"	"	NA
Aroclor 1248	"	"	"	"	"	"	NA
Aroclor 1254	"	"	"	"	"	"	NA
Aroclor 1260	"	"	1.31	"	"	"	NA
<b>Total PCBs</b>	"	"	1.31	"	"	"	NA

- Notes: 1) Results from USEPA Method 8082 PCBs; All results in ppm (mg/kg).  
2) " means compound not detected above MDL.  
3) Shaded results indicates concentration exceeds the TAGM 4046 Standard.

**Table 8**  
**Soil Sample Analytical Results; PH**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 18, 19, 31 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB1 (12'-13.5')	SB2 (8'-10') & (0'-4')	SB10 (8'-10')	SB15 (4'-8')	SB18 (4'-8')	Hazardous Corrosivity Level
pH	9.21	8.44	7.63	6.63	8.22	< 2 or >12.5

Analytical Parameter	Plant #1 Sump Pits	Plant #2 Manhole (Exterior)	SB30 (8'-12')	Drum Waste (A) (ETP-3)	Hazardous Corrosivity Level
pH	9.68	9.18	10.05	7.93	< 2 or >12.5

Analytical Parameter	Drum Waste (B) (ETP-3)	Drum Waste (C) (ETP-3)	Below Drums (±6') (ETP-3)	ETP-14 Under Drums	Hazardous Corrosivity Level
pH	7.96	9	8.35	8.6	< 2 or >12.5

Analytical Parameter	MT-1 Under Tank	MT-4 (6'-7.5') Under Drain	MT-6 (3'-6')	MT-8 (3'-6')	Hazardous Corrosivity Level
pH	8.54	8.45	8.34	7.47	< 2 or >12.5

Notes: 1) All results and Standards expressed in SU.  
2) Shaded result indicates pH above the Hazardous Corrosivity Level.

**Groundwater Sample Analytical Results; PH**  
**3774 Lakeshore Road, Hamburg, NY**  
**October 19 & November 1, 2006 Sampling Dates**

Analytical Parameter	SB2	SB14	SB17	ETP-14	Hazardous Corrosivity Level
pH	7.20	8.00	10.82	7.46	< 2 or >12.5

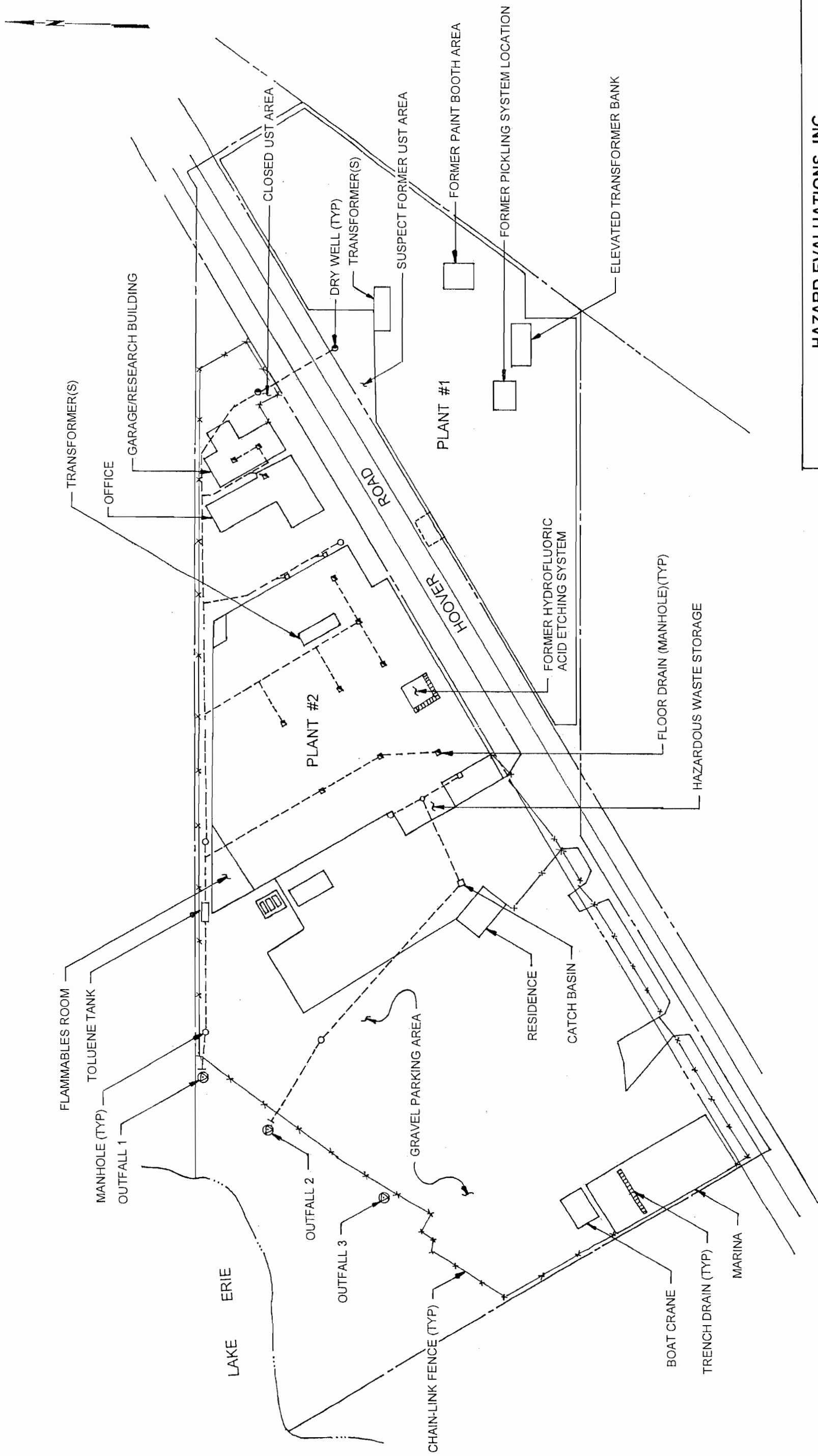
Notes: 1) All results and Standards expressed in SU.  
2) Shaded result indicates pH above the Hazardous Corrosivity Level.



**Attachment 1**

**Figures**





HAZARD EVALUATIONS, INC.			
Phase I/II Audits - Site Investigations - Facility Inspections			
SITE PLAN			
INDUSTRIAL PROPERTY			
3774 LAKE SHORE ROAD, HAMBURG, NEW YORK			
NEVILLE LUMBER CO., INC.			
BUFFALO, NEW YORK			
DRAWN BY: DLW	SCALE: NOT TO SCALE	PROJECT: 0567	
CHECKED BY: SAO	DATE: 10/06	DRAWING NO: 2	