



Glenn Springs Holdings, Inc.

A subsidiary of Occidental Petroleum

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April 20, 2009

Mr. Gregory P. Sutton
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
270 Michigan Avenue
Region 9
Buffalo, NY 14203-2999

Dear Mr. Sutton:

Re: Analytical Results and QA/QC Review
Semiannual Groundwater Sampling – March 2009
102nd Street Landfill Site, Niagara Falls, New York

On behalf of Glenn Springs Holdings, Inc (GSHI) and per the requirements of the Consent Decree and the Operations and Maintenance (O&M) Manual, Conestoga-Rovers & Associates (CRA) has prepared and is submitting the Analytical Results and Quality Assurance/Quality Control (QA/QC) Review for the Semiannual Groundwater Sampling performed at the 102nd Street Landfill Site (Site) in March 2009. An electronic copy is provided on the enclosed CD.

The quarterly groundwater quality monitoring that was required for the first two (2) years of operation in accordance with the approved O&M Manual was completed in April 2004. As per the O&M Manual, monitoring is to be performed semiannually for the following 8 years after completion of the quarterly monitoring. Therefore, semiannual groundwater quality monitoring will continue through 2012.

A figure showing the orientation of the Site and the locations of the monitoring wells is included in this submittal as Figure 1.

Please contact Jane Polovich at 716-297-6150 or myself at 972-687-7506 should you have any questions or concerns.

Very truly yours,

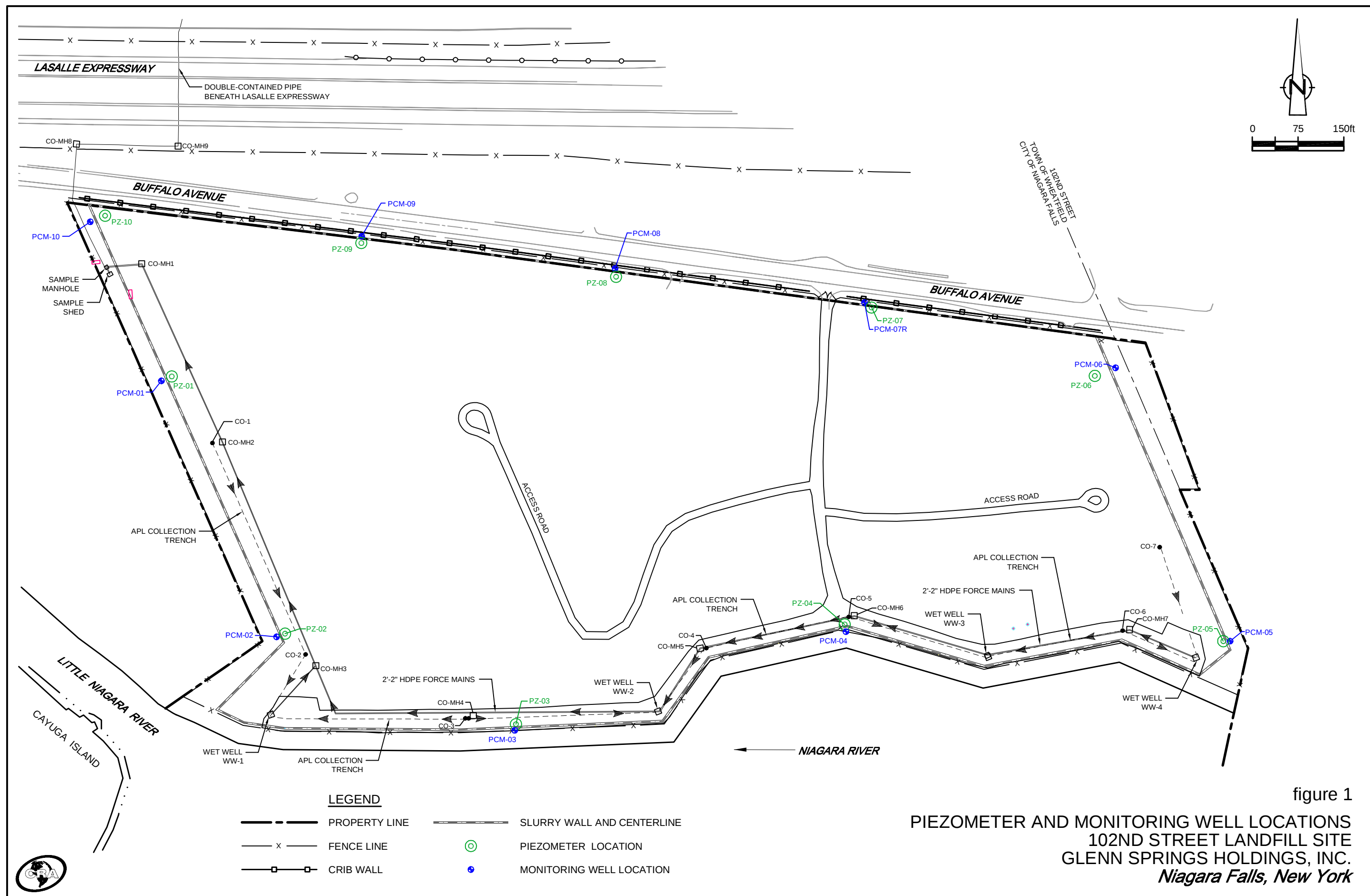
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Encl.

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Brian Sadowski, NYSDEC





**CONESTOGA-ROVERS
& ASSOCIATES**

E-Mail Date: April 15, 2009
E-Mail To: Mike Bellotti; Clint Babcock;
Dennis Hoyt; Jane Polovich
c.c.: Paul McMahon
E-Mail and Hard Copy If Requested

ANALYTICAL RESULTS AND QA/QC REVIEW
SEMI-ANNUAL GROUNDWATER SAMPLING
102ND STREET LANDFILL
NIAGARA FALLS, NEW YORK
MARCH 2009

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1.0 INTRODUCTION

Groundwater samples were collected in support of the Operation and Maintenance Program at the 102nd Street Landfill (Site) in Niagara Falls, New York. The samples were collected in March 2009 and delivered to Mitkem Laboratories in Warwick, Rhode Island for analysis. Samples were analyzed for Site-Specific Parameter List (SSPL) volatile organic compounds (VOCs), SSPL semi-volatile organic compounds (SVOCs), SSPL pesticides, total mercury, and total arsenic. A sampling and analysis summary is presented in Table 1. The analytical results are summarized in Table 2 and the analytical methods used are summarized in Table 3. Copies of the Chain of Custody documents are included in Attachment A.

The final sample results and supporting quality assurance/quality control (QA/QC) results were reported by the laboratory in accordance with the requested deliverables. The QA/QC criteria by which these data were assessed are outlined in the analytical methods used and the following guidance documents:

- i) "USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review", October 1999; and
- ii) "USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review", February 1994.

All data were reviewed for the QA/QC information detailed in Section 2.0 by Paul McMahon of CRA, Inc.

A graphical presentation of the concentration of chemical constituents versus time for wells PCM-03, PCM-04, and PCM-05 is located in Attachment B.

2.0 QA/QC REVIEW

Holding Times

The sample holding time criteria are specified in Table 3. All holding time criteria were met. All samples were properly preserved and received chilled.

Surrogate Spike Recoveries –VOCs/SVOCs/Pesticides

All samples and blanks analyzed for VOCs, SVOCs, and pesticides were spiked with surrogate compounds prior to sample extraction and/or analysis. Per the "Guidelines",

it is acceptable for one SVOC surrogate recovery per fraction to be outside of the limits provided the recovery is greater than 10 percent.

Most surrogate spike recoveries were acceptable per the "Guidelines", indicating good analytical efficiency. High VOC surrogate recoveries were reported for the neat analysis of one sample. All associated detected sample results were qualified as estimated (see Table 4).

Laboratory Method Blank Analyses

Method blanks were extracted and/or analyzed with the investigative samples for all parameters. All methods blanks were non-detect for the analytes of interest.

Matrix Spike/Matrix Spike Duplicate/Duplicate (MS/MSD/Duplicate) Analyses

One sample was selected for MS/MSD analyses as specified in Table 1. The metals analyses were also performed in duplicate. All recoveries and relative percent differences (RPDs) were acceptable, demonstrating good analytical accuracy and precision.

Blank Spike (BS) Analyses

BS and/or laboratory control samples (LCSs) were analyzed for all parameters. Some analyses were performed in duplicate. All recoveries and RPDs were acceptable, indicating good analytical accuracy and precision.

Field Duplicate Analysis

One field duplicate sample was submitted "blind" to the laboratory for analyses as summarized in Table 1.

All field duplicate results showed acceptable reproducibility outside of estimated regions of detection, indicating good laboratory and sampling protocol precision.

Trip Blanks

Two trip blanks were collected for the program. The trip blanks were analyzed for VOCs, and all results were non-detect.

Rinse Blank Analysis

One rinse blank was collected for the program as detailed in Table 1. All rinse blank results were non-detect except for 2-Chlorotoluene. Associated results detected at levels similar to the blank were qualified as non-detect (see Table 5).

3.0 CONCLUSION

Based on this QA/QC review, the data presented in Table 2 are acceptable with the noted qualifications.

TABLES

TABLE 1

SAMPLE COLLECTION AND ANALYSIS SUMMARY
SEMI-ANNUAL GROUNDWATER SAMPLING
102ND STREET LANDFILL
NIAGARA FALLS, NEW YORK
MARCH 2009

Sample ID	Location I.D. ⁽¹⁾	Collection Date	Collection Time	<u>Analysis/Parameters</u>				Depth to Water ⁽²⁾ (ft. BTOC)	Comment
				BHCs	VOCs	Metals	SVOCs		
PCBM-01-309	PCBM-01	03/18/09	10:45	X	X	X	X	12.95	Duplicate of PCBM-01-309 MS/MSD (3)
PCM-13-309	PCBM-01	03/18/09	12:00	X	X	X	X	12.95	
PCBM-02-309	PCBM-02	03/18/09	9:15	X	X	X	X	12.11	
PCBM-03-309	PCBM-03	03/18/09	13:30	X	X	X	X	16.11	
PCM-01-309	PCM-01	03/18/09	14:00	X	X	X	X	11.56	
PCM-02-309	PCM-02	03/18/09	11:30	X	X	X	X	9.84	
PCM-03-309	PCM-03	03/18/09	12:05	X	X	X	X	0.29	
PCM-04-309	PCM-04	03/18/09	14:30	X	X	X	X	12.6	
PCM-05-309	PCM-05	03/18/09	9:30	X	X	X	X	12.28	
TRIP102-31809	-	03/18/09	-		X			-	
RIN102-309	-	03/18/09	-	X	X	X	X	-	Trip Blank Rinse Blank
PCM-7R-309	PCM-7R	03/19/09	9:00	X	X	X	X	14	Trip Blank
PCM-09-309	PCM-09	03/19/09	8:35	X	X	X	X	1.16	
PCM-08-309	PCM-08	03/19/09	12:30	X	X	X	X	10.74	
PCM-10-309	PCM-10	03/19/09	10:15	X	X	X	X	11.78	
TRIP102-31909	-	03/19/09	-		X			-	

Notes:

- ⁽¹⁾ Well PCM-06 was dry.
- ⁽²⁾ Niagara River water level for March 19, 2009 was 563.85 feet.
- ⁽³⁾ Well was inadvertently sampled again on 3/19/09 - as all results were similar only the 3/18/09 sample results were used.
- Not applicable.
- BHCs Benzene Hexachlorides.
- ft. BTOC Feet Below Top of Casing.
- MS Matrix Spike.
- MSD Matrix Spike Duplicate.
- SVOCs Semi-Volatile Organic Compounds.
- VOCs Volatile Organic Compounds.

TABLE 2

ANALYTICAL RESULTS SUMMARY
SEMI-ANNUAL GROUNDWATER SAMPLING
102ND STREET LANDFILL
NIAGARA FALLS, NEW YORK
MARCH 2009

<i>Sample Location:</i>		<i>PCBM-01</i>	<i>PCBM-01</i>	<i>PCBM-02</i>	<i>PCBM-03</i>	<i>PCM-01</i>	<i>PCM-02</i>	<i>PCM-03</i>
<i>Sample ID:</i>		<i>PCBM-01-309</i>	<i>PCM-13-309</i>	<i>PCBM-02-309</i>	<i>PCBM-03-309</i>	<i>PCM-01-309</i>	<i>PCM-02-309</i>	<i>PCM-03-309 031809</i>
<i>Sample Date:</i>		<i>3/18/2009</i>	<i>3/18/2009</i>	<i>3/18/2009</i>	<i>3/18/2009</i>	<i>3/18/2009</i>	<i>3/18/2009</i>	<i>3/18/2009</i>
		<i>(Duplicate)</i>						
<i>Parameters</i>	<i>Units</i>							
<i>Volatile Organic Compounds</i>								
1,2,3-Trichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	97
1,4-Dichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	440
2-Chlorotoluene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	12 U
Benzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	84
Chlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	4300
<i>Semi-volatile Organic Compounds</i>								
1,2,4,5-Tetrachlorobenzene	µg/L	10 U	10 U	10 U	10 U	10 U	10 U	10 U
2,4,5-Trichlorophenol	µg/L	10 U	10 U	10 U	10 U	10 U	10 U	10 U
2,4-Dichlorophenol	µg/L	10 U	10 U	10 U	10 U	10 U	10 U	28
2,5-Dichlorophenol	µg/L	10 U	10 U	10 U	10 U	10 U	10 U	6.1 J
2-Chlorophenol	µg/L	10 U	10 U	10 U	10 U	10 U	10 U	41
4-Chlorophenol	µg/L	10 U	10 U	10 U	10 U	10 U	10 U	93
Phenol	µg/L	10 U	10 U	10 U	10 U	10 U	10 U	4.2 J
<i>Pesticides</i>								
alpha-BHC	µg/L	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U
beta-BHC	µg/L	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.072
delta-BHC	µg/L	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	2.0
gamma-BHC (Lindane)	µg/L	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U

TABLE 2

ANALYTICAL RESULTS SUMMARY
SEMI-ANNUAL GROUNDWATER SAMPLING
102ND STREET LANDFILL
NIAGARA FALLS, NEW YORK
MARCH 2009

	<i>Sample Location:</i>	PCBM-01	PCBM-01	PCBM-02	PCBM-03	PCM-01	PCM-02	PCM-03
	<i>Sample ID:</i>	PCBM-01-309	PCM-13-309	PCBM-02-309	PCBM-03-309	PCM-01-309	PCM-02-309	PCM-03-309 031809
	<i>Sample Date:</i>	3/18/2009	3/18/2009	3/18/2009	3/18/2009	3/18/2009	3/18/2009	3/18/2009
			(Duplicate)					
<i>Parameters</i>	<i>Units</i>							
<i>Metals</i>								
Arsenic	µg/L	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Mercury	µg/L	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U

TABLE 2

ANALYTICAL RESULTS SUMMARY
SEMI-ANNUAL GROUNDWATER SAMPLING
102ND STREET LANDFILL
NIAGARA FALLS, NEW YORK
MARCH 2009

<i>Sample Location:</i>		<i>PCM-04</i>	<i>PCM-05</i>	<i>PCM-07R</i>	<i>PCM-08</i>	<i>PCM-09</i>	<i>PCM-10</i>
<i>Sample ID:</i>		<i>PCM-04-309</i>	<i>PCM-05-309</i>	<i>PCM-7R-309</i>	<i>PCM-08-309</i>	<i>PCM-09-309</i>	<i>PCM-10-309</i>
<i>Sample Date:</i>		<i>3/18/2009</i>	<i>3/18/2009</i>	<i>3/19/2009</i>	<i>3/19/2009</i>	<i>3/19/2009</i>	<i>3/19/2009</i>
<i>Parameters</i>	<i>Units</i>						
<i>Volatile Organic Compounds</i>							
1,2,3-Trichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	µg/L	290	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
2-Chlorotoluene	µg/L	2.1 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Benzene	µg/L	41 J	9.2	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	µg/L	10000	190	1.0 U	1.0 U	1.0 U	1.0 U
<i>Semi-volatile Organic Compounds</i>							
1,2,4,5-Tetrachlorobenzene	µg/L	10 U	10 U	10 U	10 U	10 U	10 U
2,4,5-Trichlorophenol	µg/L	10 U	10 U	10 U	10 U	10 U	10 U
2,4-Dichlorophenol	µg/L	1.8 J	10 U	10 U	10 U	10 U	10 U
2,5-Dichlorophenol	µg/L	1.9 J	10 U	10 U	10 U	10 U	10 U
2-Chlorophenol	µg/L	34	0.78 J	10 U	10 U	10 U	10 U
4-Chlorophenol	µg/L	66	2.9 J	10 U	10 U	10 U	10 U
Phenol	µg/L	2.4 J	10 U	10 U	10 U	10 U	10 U
<i>Pesticides</i>							
alpha-BHC	µg/L	0.050 U	0.050 U	0.052	0.050 U	0.050 U	0.050 U
beta-BHC	µg/L	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U
delta-BHC	µg/L	1.2	0.050 U	0.038 J	0.050 U	0.050 U	0.050 U
gamma-BHC (Lindane)	µg/L	0.050 U	0.050 U	0.051	0.050 U	0.050 U	0.050 U

TABLE 2

ANALYTICAL RESULTS SUMMARY
SEMI-ANNUAL GROUNDWATER SAMPLING
102ND STREET LANDFILL
NIAGARA FALLS, NEW YORK
MARCH 2009

	<i>Sample Location:</i>	<i>PCM-04</i>	<i>PCM-05</i>	<i>PCM-07R</i>	<i>PCM-08</i>	<i>PCM-09</i>	<i>PCM-10</i>
	<i>Sample ID:</i>	<i>PCM-04-309</i>	<i>PCM-05-309</i>	<i>PCM-7R-309</i>	<i>PCM-08-309</i>	<i>PCM-09-309</i>	<i>PCM-10-309</i>
	<i>Sample Date:</i>	<i>3/18/2009</i>	<i>3/18/2009</i>	<i>3/19/2009</i>	<i>3/19/2009</i>	<i>3/19/2009</i>	<i>3/19/2009</i>
<i>Parameters</i>	<i>Units</i>						
<i>Metals</i>							
Arsenic	µg/L	10 U	10 U	10 U	10 U	10 U	10 U
Mercury	µg/L	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U

Notes:

J - Estimated concentration.

U - Not present at or above the associated value.

TABLE 3
ANALYTICAL METHOD SUMMARY
SEMI-ANNUAL GROUNDWATER SAMPLING
102ND STREET LANDFILL
NIAGARA FALLS, NEW YORK
MARCH 2009

<i>Analyses</i>	<i>Methodology</i> ⁽¹⁾	<i>Holding Time to Extraction (Days)</i>	<i>Holding Time to Analyses (Days)</i>
VOCs	SW-846 8260B	-	14
SVOCs	SW-846 8270C	7	40
Pesticides	SW-846 8081A	7	40
Arsenic	SW-846 6010B	-	180
Mercury	SW-846 7470A	-	28

Notes:

(1) Referenced from "Test Methods for Evaluating Solid Waste", USEPA OSW, 3rd Edition, 1986 and subsequent revisions.

SVOCs Semi-Volatile Organic Compounds.

VOCs Volatile Organic Compounds.

TABLE 4
 QUALIFIED SAMPLE RESULTS DUE TO OUTLYING SURROGATE RECOVERIES
 SEMI-ANNUAL GROUNDWATER SAMPLING
 102ND STREET LANDFILL
 NIAGARA FALLS, NEW YORK
 MARCH 2009

<i>Parameter</i>	<i>Surrogate</i>	<i>Surrogate Recovery (percent)</i>	<i>Control Limits (percent)</i>	<i>Sample ID</i>	<i>Analytes</i>	<i>Sample Results</i>	<i>Units</i>	<i>Qualifier</i>
VOCs	Toluene-d8	123	85-120	PCM-04-309	Benzene	41	µg/L	J
	Bromofluorobenzene	121	75-120					

Notes:

J Estimated.
 VOCs Volatile Organic Compounds.

TABLE 5
 QUALIFIED SAMPLE RESULTS DUE TO ANALYTE CONCENTRATIONS IN THE RINSE BLANKS
 SEMI-ANNUAL GROUNDWATER SAMPLING
 102ND STREET LANDFILL
 NIAGARA FALLS, NEW YORK
 MARCH 2009

<i>Parameter</i>	<i>Rinse Blank ID</i>	<i>Analyte</i>	<i>Blank Result</i>	<i>Associated Sample ID</i>	<i>Sample Result (µg/L)</i>	<i>Qualified Sample Result (µg/L)</i>
VOCs	RIN102-309	2-Chlorotoluene	3.9	PCM-03-309	12	12 U
				PCM-04-309	2.1	2.1 U

Notes:

U Not detected.

VOCs Volatile Organic Compounds.

ATTACHMENT A

CHAIN OF CUSTODY DOCUMENTS

CHAIN OF CUSTODY RECORD

Due Date: 4/3/09

Page 1 of 1

Miller Springs Remediation Occidental Chemical		SHIP TO (LABORATORY NAME): Mitkem Labs 175 Metro Center Blvd. Warwick, RI 02886		REFERENCE NUMBER: 102nd Street Semi-Annual 274-402-999-3100 401/732-3400 x 314		SAMPLE RESULTS REPORTING TO: Paul McMahan Fax: (716) 297-6150 Phone: (716) 297-2150 Mailing Address: CRA 2055 Niagara Falls Blvd. Suite 3 NIAGARA FALLS, NY 14304 NT Facility Fax (716) 693-4681 Phone: (716) 693-4616									
FACILITY LOCATION: 102ND STREET		SAMPLER(S) (PRINT NAME) DJT/SG		SIGNATURE <i>Shawn Hardner</i>											
DATE	TIME	SAMPLE NO.	COMPOSITE	GRAB	OTHER	CONTAINER TYPE	CONTAINERS NO. of	VOA	SVOC	BHC	ARSENIC / MERCURY	PRESERVED	REMARKS		
03/18/09	14:00	PCM-01-309		X		*	8	3	1	2	1	-	ALL SAMPLES STORED		
03/18/09	11:30	PCM-02-309					8	3	1	2	1	HCL	AND SHIPPED IN COOLER(S)		
03/18/09	12:05	PCM-03-309					8	3	1	2	1		WITH ICE/ICE PACKS AND		
03/18/09	10:45	PCBM-01-309					8	3	1	2	1		KEPT AT 4c		
03/18/09	9:15	PCBM-02-309					24	9	6	6	3				
03/18/09	13:30	PCBM-03-309					8	3	1	2	1				
03/18/09	14:30	PCM-04-309					8	3	1	2	1				
03/18/09	9:30	PCM-05-309					8	3	1	2	1				
03/18/09	12:00	PCM-13-309					8	3	1	2	1				
03/18/09	15:00	RIN103-309					8	3	1	2	1		BNA 1 Ltr. AG		
													VOA 40ML HCL		
													SVOC 1 Ltr. AG		
													ARSENIC 500 mL P HNO3		
													MERCURY 1 Ltr. P		
03/18/09		TRP102-31809			X	40 mL G	2								
TOTAL NUMBER OF CONTAINERS							85 98								
RELINQUISHED BY:		DATE		TIME		RECEIVED BY:		DATE		TIME					
<i>Shawn Hardner</i>		3/18/09		1530		<i>Shawn Hardner</i>		3/19/09		8:55					
RELINQUISHED BY:		DATE		TIME		RECEIVED BY:		DATE		TIME					
RELINQUISHED BY:		DATE		TIME		RECEIVED BY:		DATE		TIME					

BOTTLE TYPES : G = GLASS ; AG = AMBER GLASS ; P = HPDE (PLASTIC) ; SAG = SILANIZED AMBER GLASS
METHOD OF SHIPMENT : **UPS** SAMPLE TEAM: **DJT/SG** CHAIN OF CUSTODY NO: **102nd318091**

2101013

ATTACHMENT B

GRAPHICAL PRESENTATION
CHEMICAL CONCENTRATION VERSUS TIME

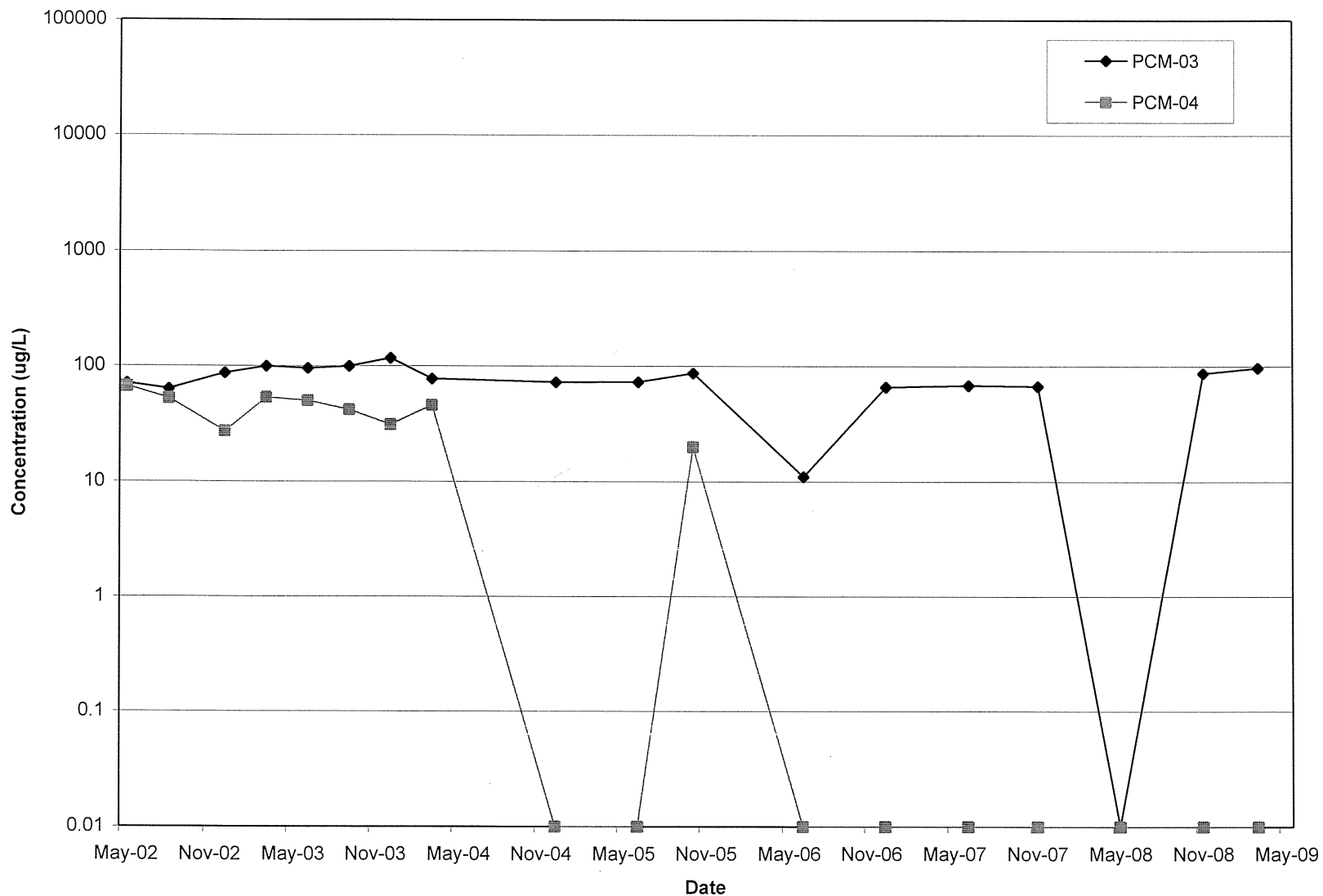


figure 1
CONCENTRATION OF 1,2-DICHLOROBENZENE vs. TIME
102ND STREET LANDFILL



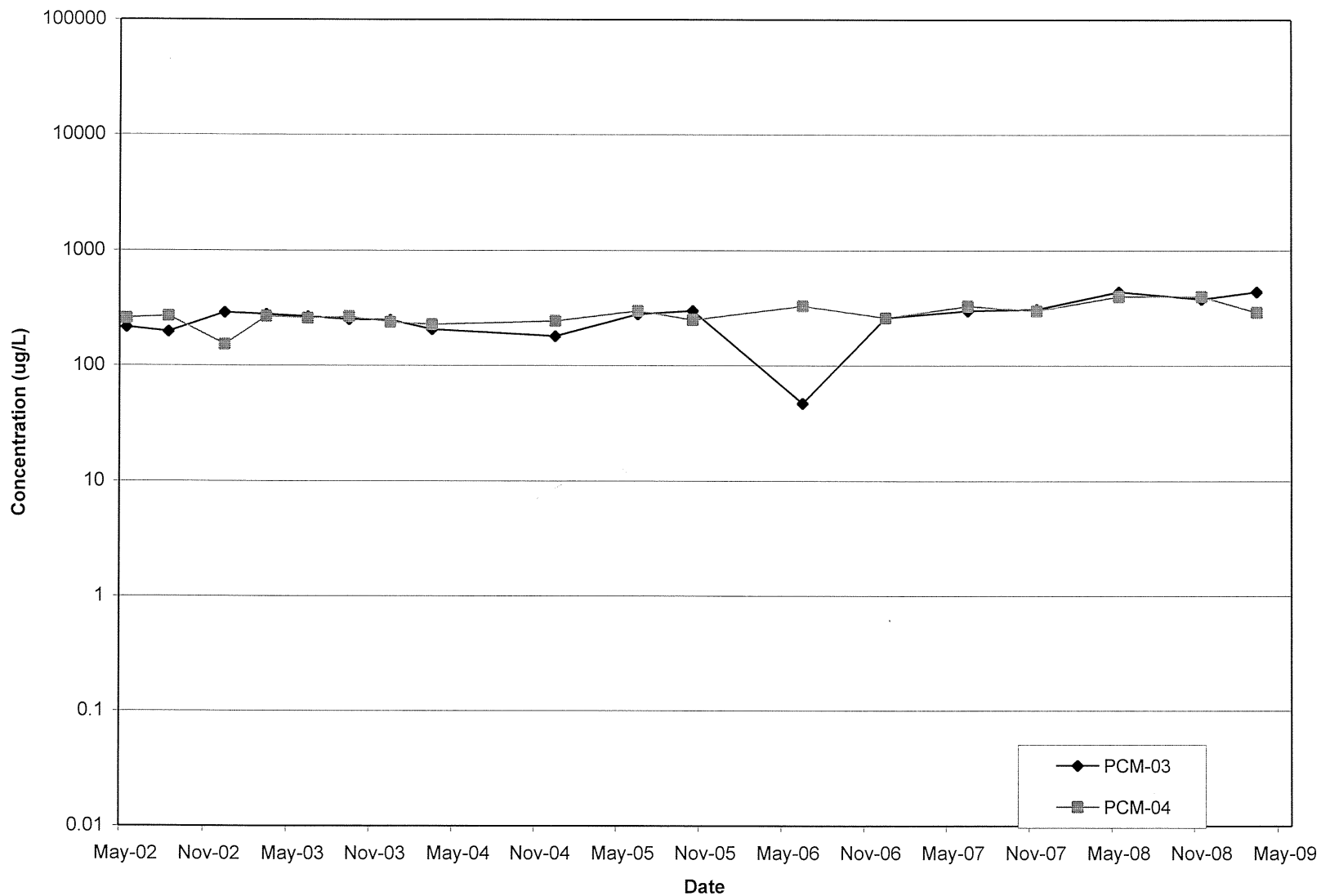


figure 2
CONCENTRATION OF 1,4-DICHLOROBENZENE vs. TIME
102ND STREET LANDFILL



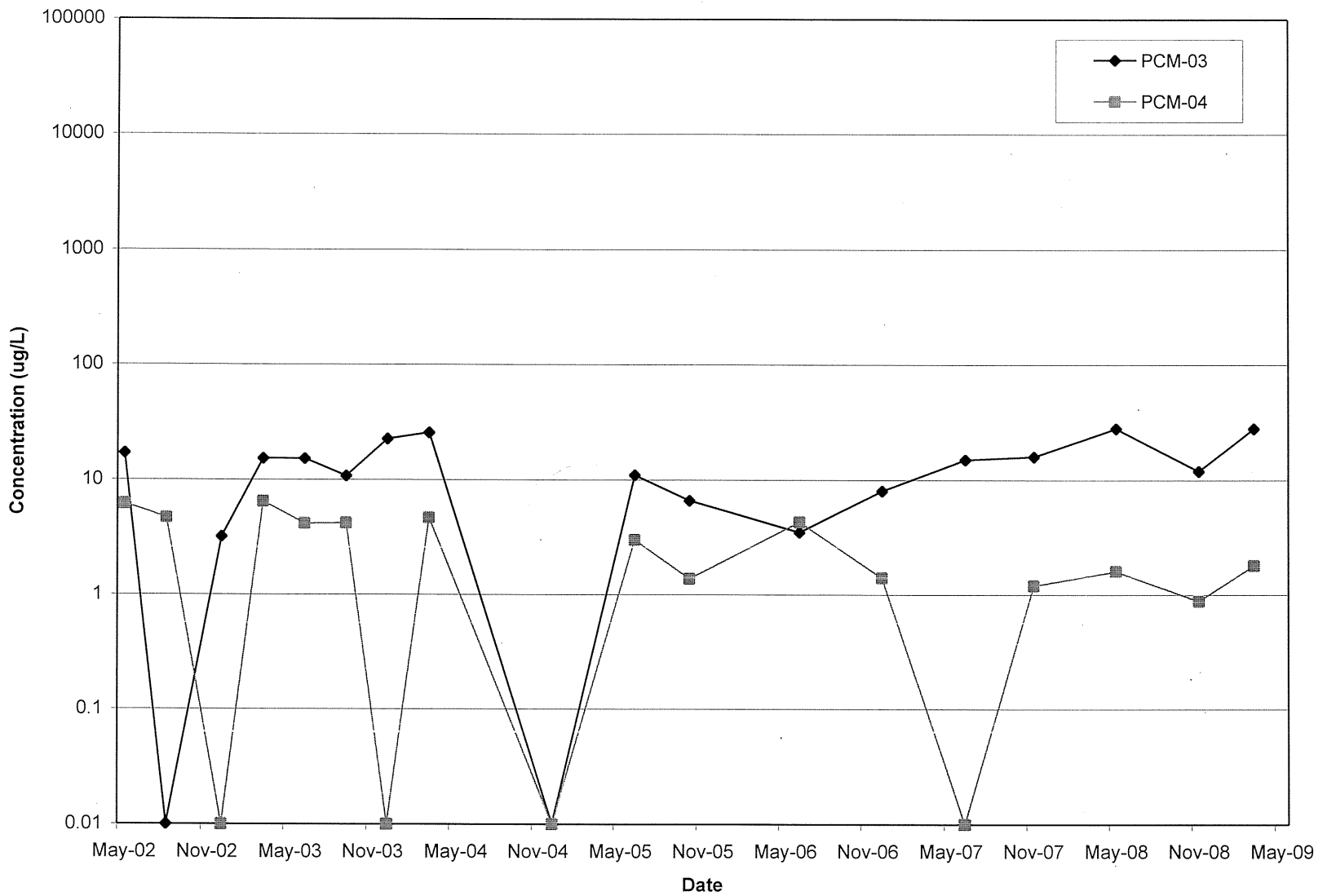


figure 3
CONCENTRATION OF 2,4-DICHLOROPHENOL vs. TIME
102ND STREET LANDFILL



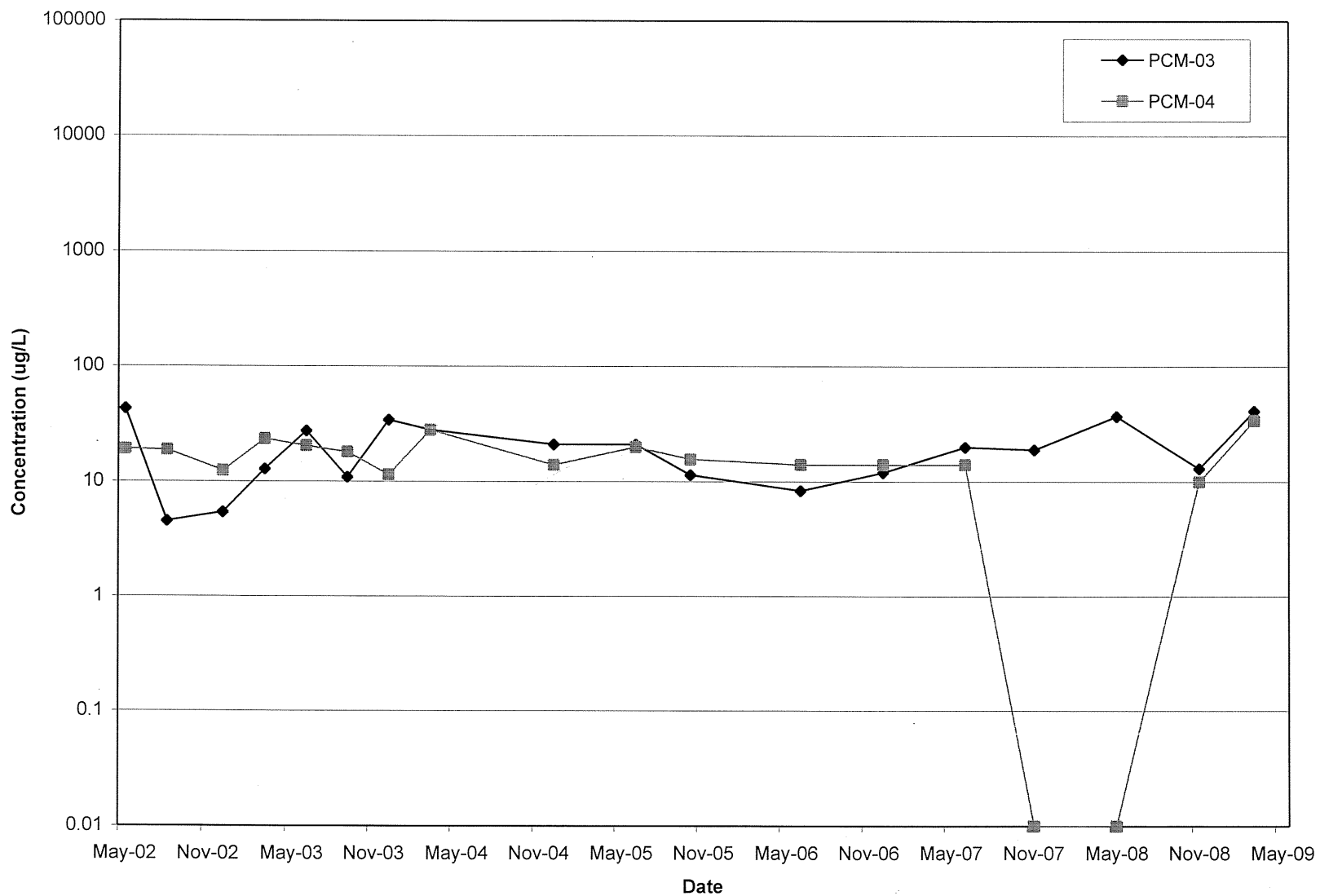


figure 4
 CONCENTRATION OF 2-CHLOROPHENOL vs. TIME
 102ND STREET LANDFILL



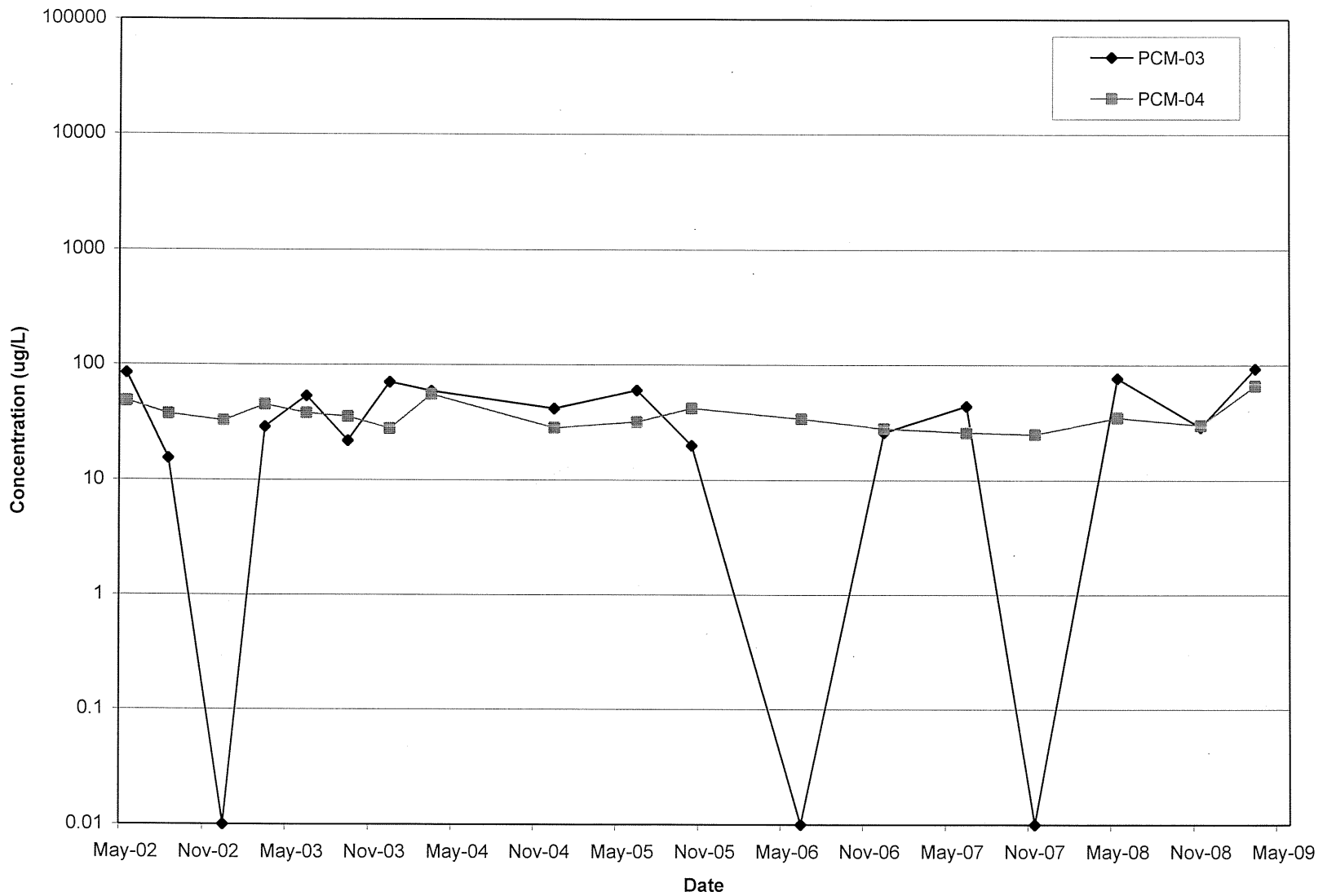


figure 5
CONCENTRATION OF 4-CHLOROPHENOL vs. TIME
102ND STREET LANDFILL



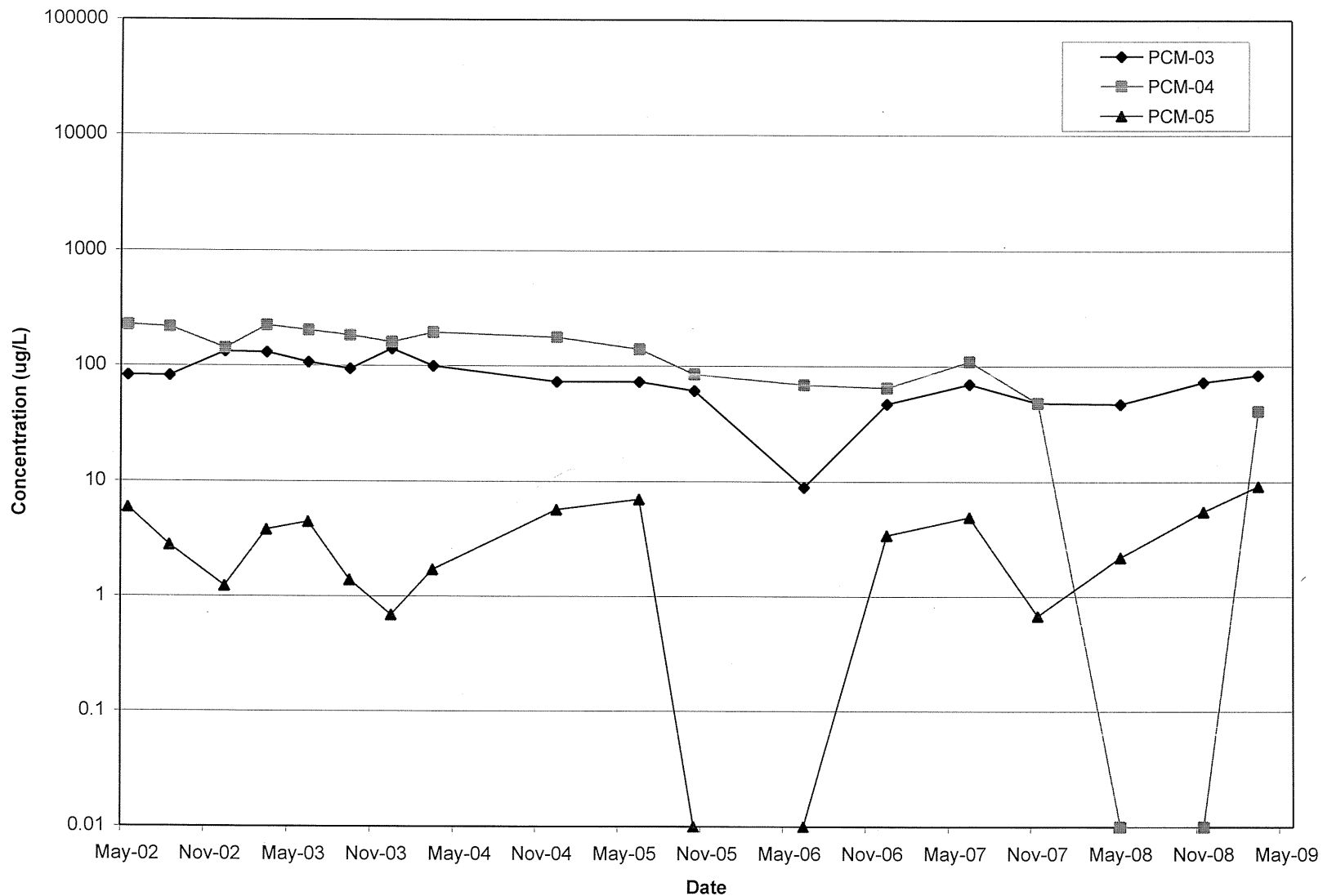


figure 6
CONCENTRATION OF BENZENE vs. TIME
102ND STREET LANDFILL



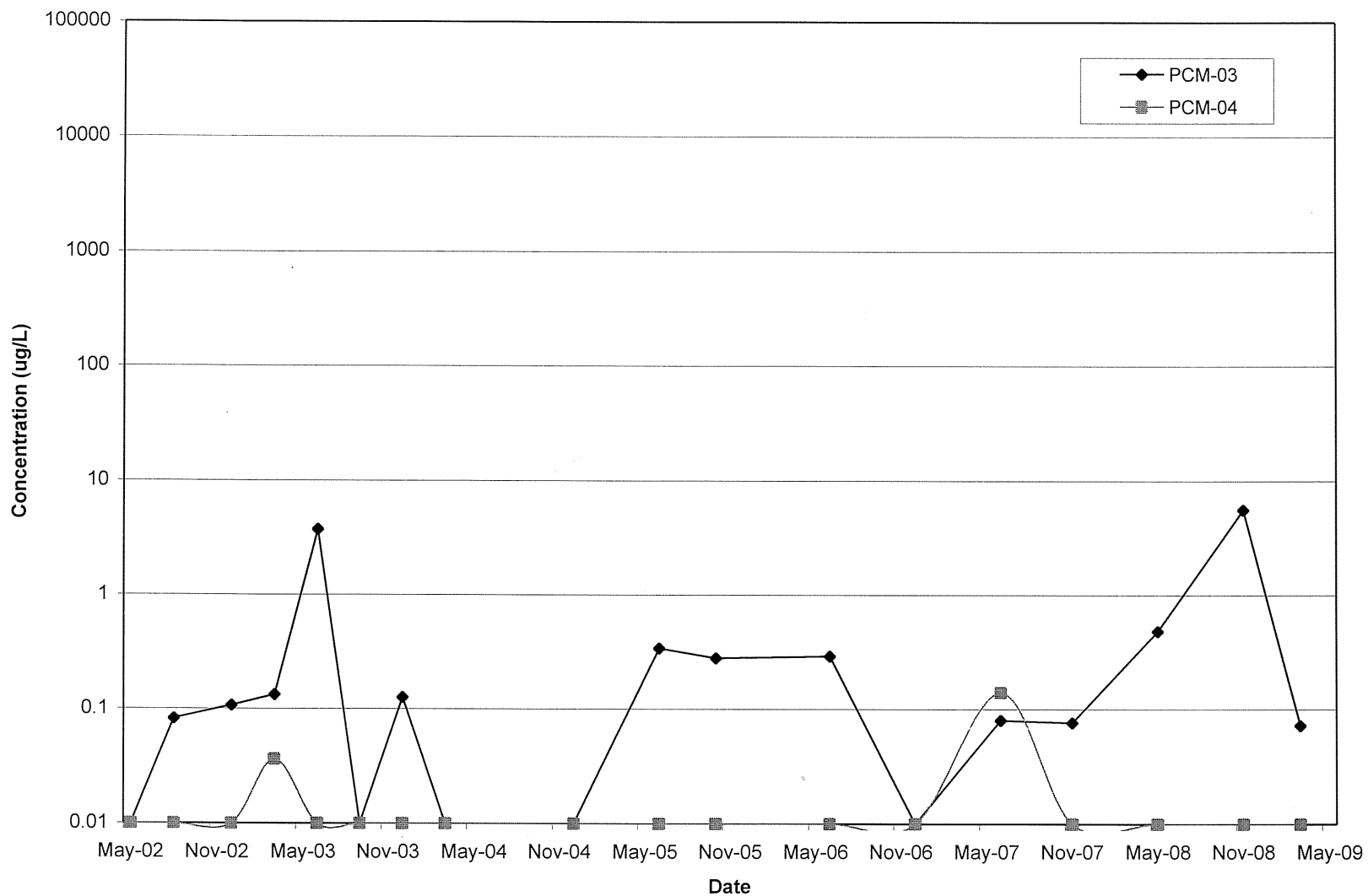


figure 7
CONCENTRATION OF BETA-BHC vs. TIME
102ND STREET LANDFILL



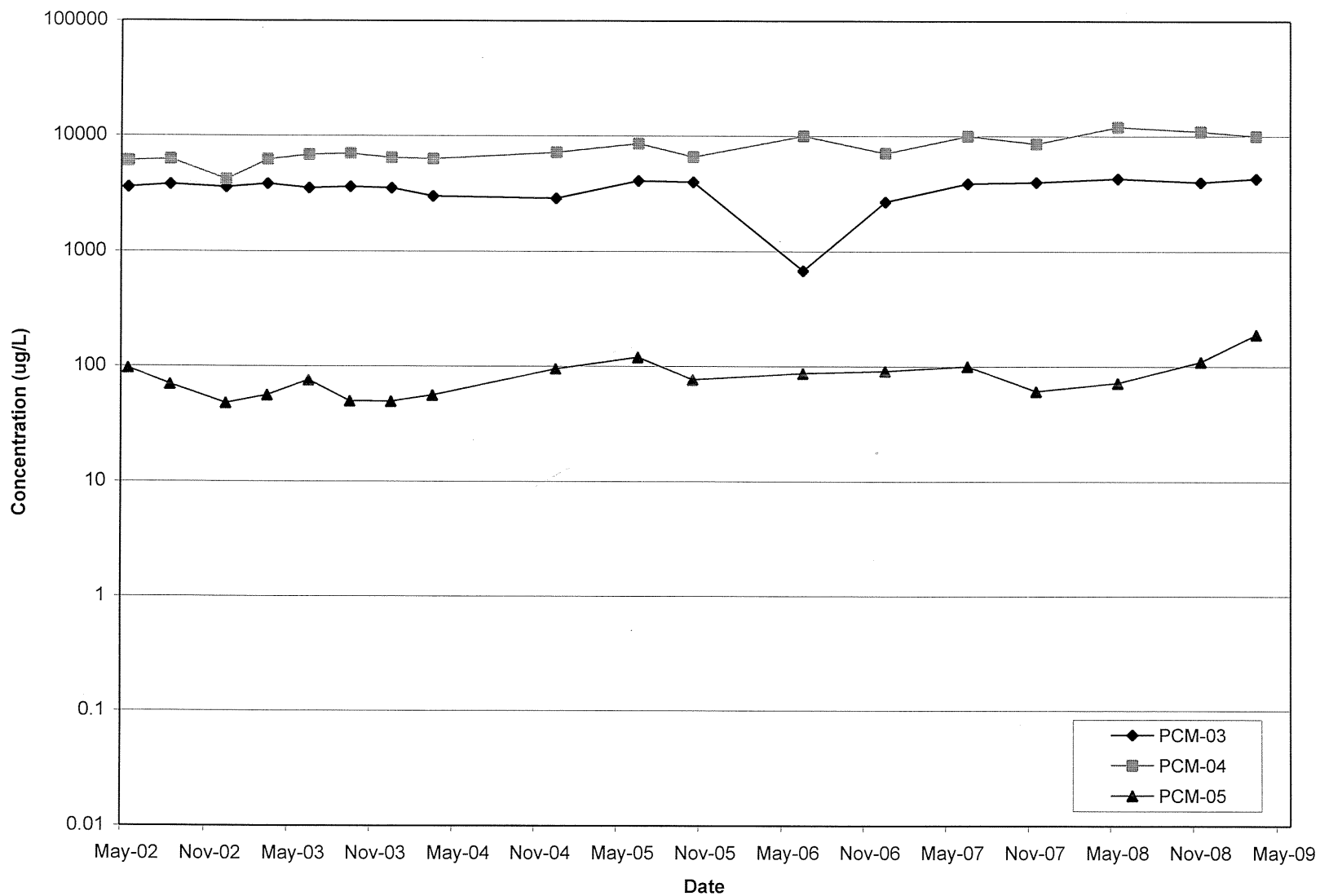


figure 8
CONCENTRATION OF CHLOROBENZENE vs. TIME
102ND STREET LANDFILL



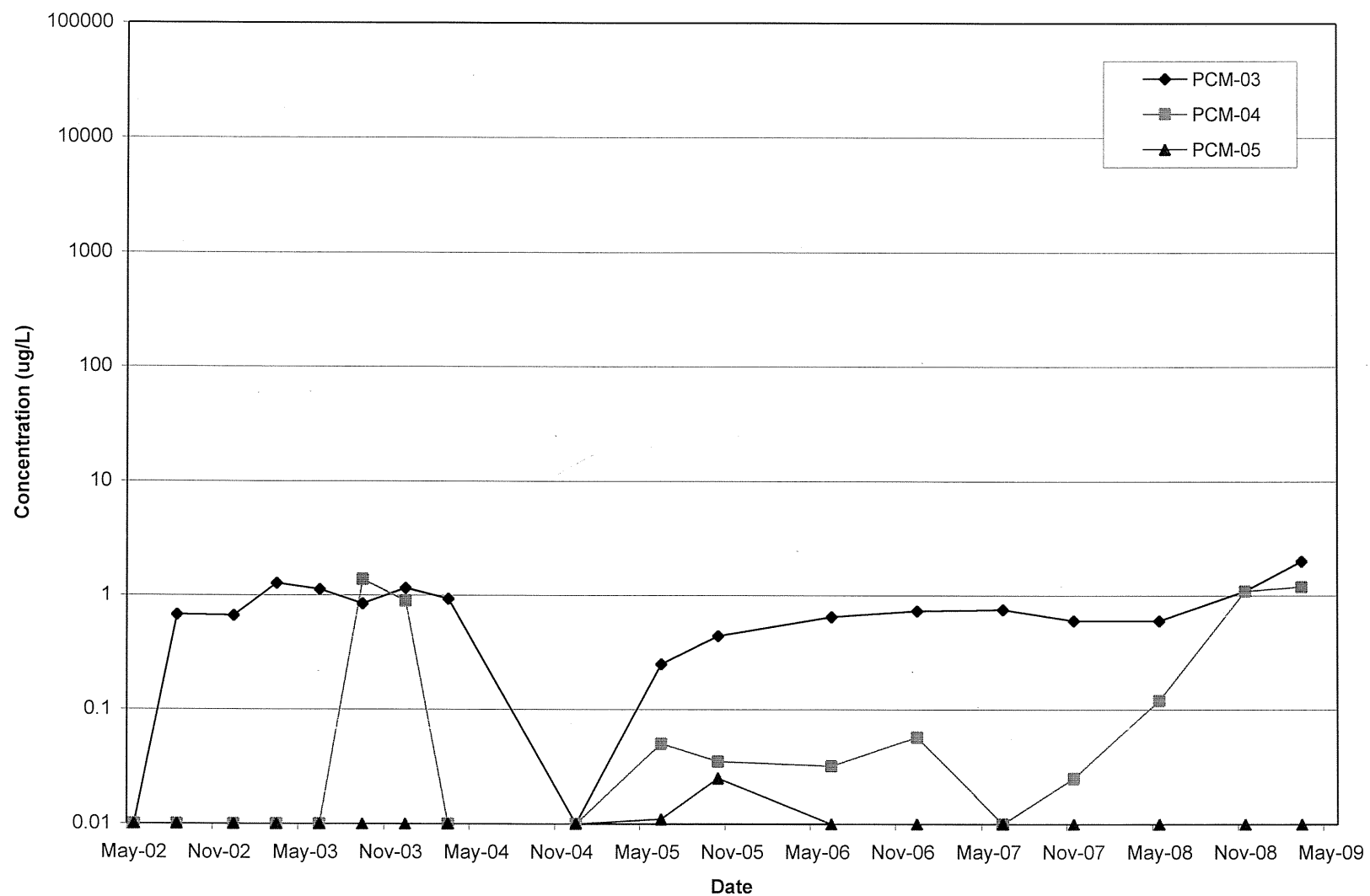


figure 9
CONCENTRATION OF DELTA-BHC vs. TIME
102ND STREET LANDFILL



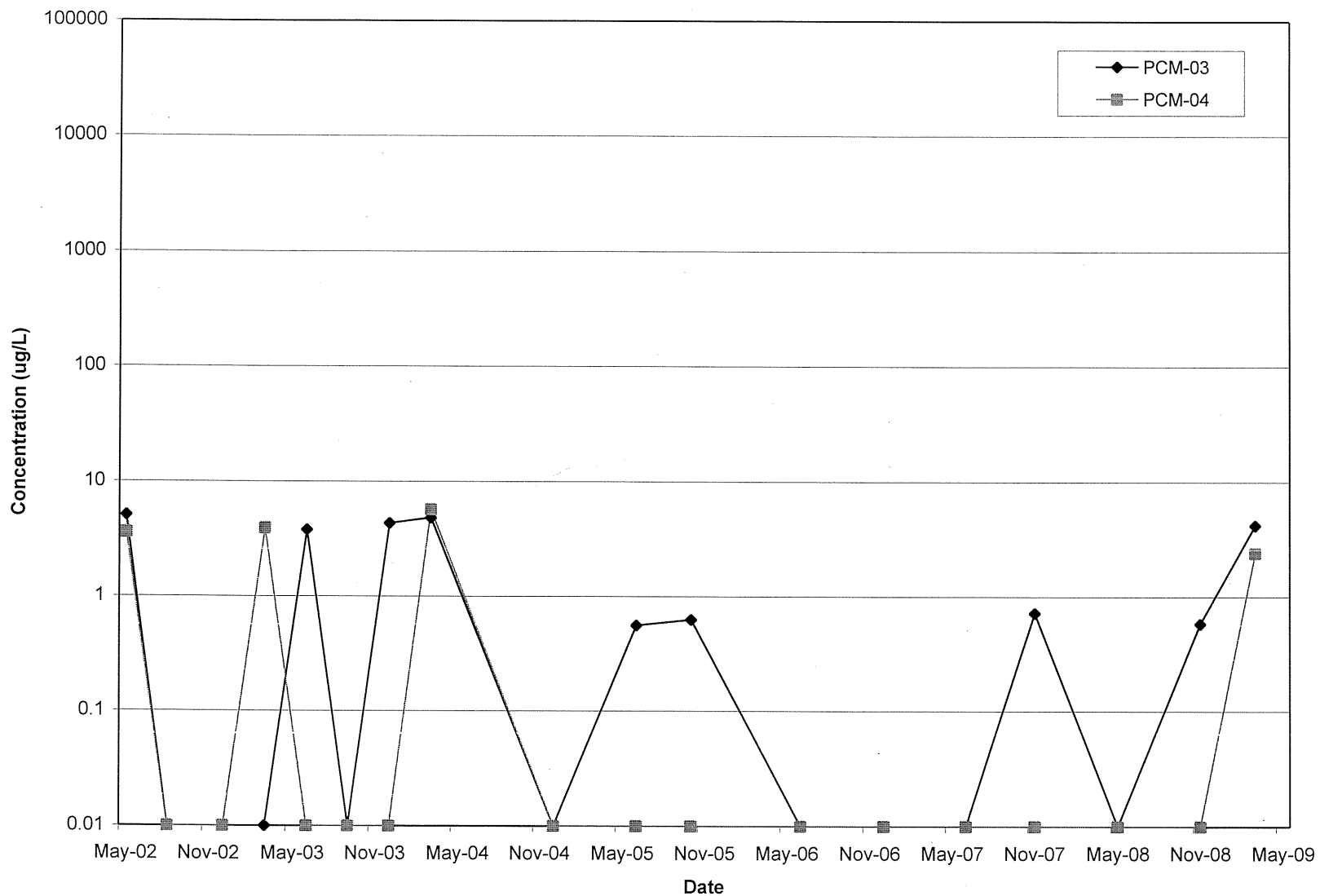


figure 10
CONCENTRATION OF PHENOL vs. TIME
102ND STREET LANDFILL

