



Glenn Springs Holdings, Inc.

A subsidiary of Occidental Petroleum

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November 24, 2009

Reference No. 001431

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 - October 2009
102nd Street Landfill Site, Niagara Falls, New York

On behalf of Glenn Springs Holdings, Inc (GSH) 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 October 2009. An electronic copy is provided on the enclosed CD.

The quarterly groundwater quality monitoring that was required for the first 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 me at 972-687-7506 should you have any questions or concerns.

Very truly yours,

Michael J. Bellotti

Michael J. Bellotti, P.G.
Environmental Remediation Group
Olin Corporation
423-336-4587

Clint Babcock

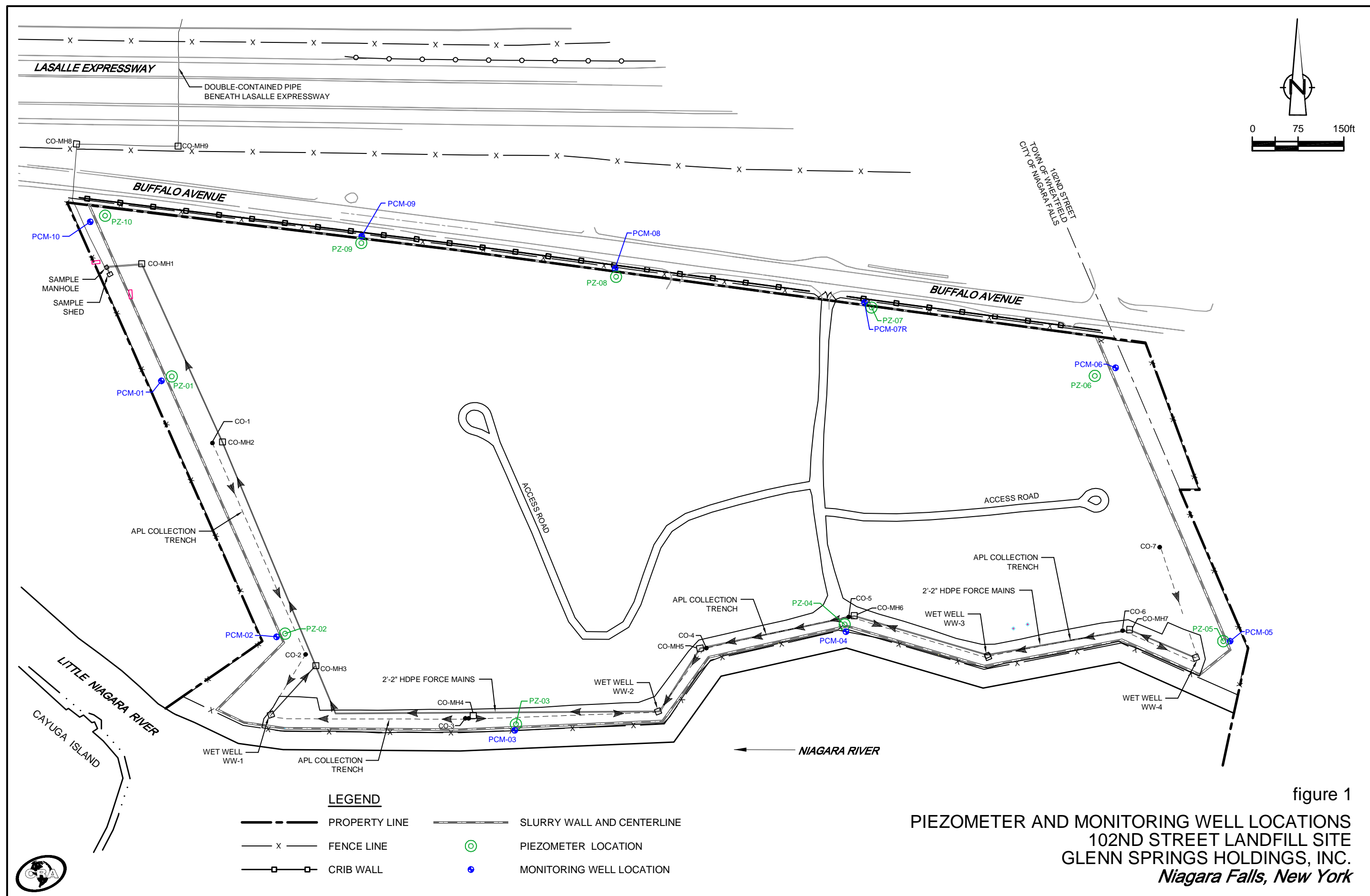
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**CONESTOGA-ROVERS
& ASSOCIATES**

E-Mail Date: November 24, 2009
E-Mail To: Mike Bellotti; Clint Babcock;
Dennis Hoyt; Jane Polovich; Ralph
Schupp
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
OCTOBER 2009

PREPARED BY:
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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 October 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
- 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. Most methods blanks were non-detect for the analytes of interest. Arsenic was detected in one method blank, and the associated sample result was qualified as non-detect (see Table 5).

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. Most recoveries and all relative percent differences (RPDs) were acceptable, demonstrating good analytical accuracy and precision. High MS/MSD recoveries were reported for one VOC. The associated sample result was non-detect and was not impacted by the indicated high bias.

Laboratory Control Sample (LCS) Analyses

LCSs were analyzed for all parameters. Some analyses were performed in duplicate. Most recoveries and RPDs were acceptable, indicating good analytical accuracy and precision. High LCS recoveries were reported for one VOC. The associated sample results were non-detect and were not impacted by the indicated high bias. One high RPD was reported for the SVOC LCS analyses, and the associated detected sample result was qualified as estimated (see Table 6).

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.

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
OCTOBER 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		
TB-102ND102109	-	10/21/09	-		X			-	Trip Blank
PCBM-011009	PCBM-01	10/21/09	13:00	X	X	X	X	12.56	MS/MSD/Duplicate
PCBM-021009	PCBM-02	10/21/09	13:30	X	X	X	X	11.89	
PCM-121009	PCBM-02	10/21/09	15:00	X	X	X	X	11.89	Duplicate of PCBM-021009
PCBM-031009	PCBM-03	10/21/09	9:45	X	X	X	X	15.91	
PCM-011009	PCM-01	10/21/09	11:15	X	X	X	X	13.26	
PCM-021009	PCM-02	10/23/09	10:15	X	X	X	X	11.85	
PCM-031009	PCM-03	10/23/09	10:30	X	X	X	X	12.91	
PCM-041009	PCM-04	10/23/09	11:30	X	X	X	X	11.69	
PCM-051009	PCM-05	10/23/09	11:45	X	X	X	X	12.29	
PCM-071009	PCM-07R	10/23/09	9:00	X	X	X	X	12.59	
PCM-081009	PCM-08	10/21/09	10:15	X	X	X	X	10.69	
PCM-101009	PCM-10	10/21/09	11:00	X	X	X	X	13.60	
TB-102ND102309	-	10/23/09	-		X			-	Trip Blank

Notes:

⁽¹⁾ Wells PCM-06 and PCM-09 were dry.

⁽²⁾ Niagara River water level for September 15, 2009 was 563.71 feet.

- 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
OCTOBER 2009

<i>Sample Location:</i>		<i>PCBM-01</i>	<i>PCBM-02</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-011009</i>	<i>PCBM-021009</i>	<i>PCM-121009</i>	<i>PCBM-031009</i>	<i>PCM-011009</i>	<i>PCM-021009</i>	<i>PCM-031009</i>
<i>Sample Date:</i>		<i>10/21/2009</i>	<i>10/21/2009</i>	<i>10/21/2009</i>	<i>10/21/2009</i>	<i>10/21/2009</i>	<i>10/23/2009</i>	<i>10/23/2009</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	90
1,4-Dichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	500
2-Chlorotoluene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Benzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	73
Chlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	4900
<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	11 J
2,5-Dichlorophenol	µg/L	10 U	10 U	10 U	10 U	10 U	10 U	3.9 J
2-Chlorophenol	µg/L	10 U	10 U	10 U	10 U	10 U	10 U	16
4-Chlorophenol	µg/L	10 U	10 U	10 U	10 U	10 U	10 U	71
Phenol	µg/L	10 U	10 U	10 U	10 U	10 U	10 U	1.3 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	0.12
delta-BHC	µg/L	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	1.5
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
<i>Metals</i>								
Arsenic	µg/L	10 U	3.3 J	2.0 J	3.4 J	3.8 J	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

Notes:

J - Estimated.

U - Not detected.

TABLE 2

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

<i>Sample Location:</i>		<i>PCM-04</i>	<i>PCM-05</i>	<i>PCM-07R</i>	<i>PCM-08</i>	<i>PCM-10</i>
<i>Sample ID:</i>		<i>PCM-041009</i>	<i>PCM-051009</i>	<i>PCM-071009</i>	<i>PCM-081009</i>	<i>PCM-101009</i>
<i>Sample Date:</i>		<i>10/23/2009</i>	<i>10/23/2009</i>	<i>10/23/2009</i>	<i>10/21/2009</i>	<i>10/21/2009</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
1,2,4-Trichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	µg/L	18 J	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	µg/L	300	1.0 U	1.0 U	1.0 U	1.0 U
2-Chlorotoluene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Benzene	µg/L	25 J	4.5	1.0 U	1.0 U	1.0 U
Chlorobenzene	µg/L	10000	150	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
2,4,5-Trichlorophenol	µg/L	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
2,5-Dichlorophenol	µg/L	1.4 J	10 U	10 U	10 U	10 U
2-Chlorophenol	µg/L	24	10 U	10 U	10 U	10 U
4-Chlorophenol	µg/L	49	10 U	10 U	10 U	10 U
Phenol	µg/L	7.2 J	10 U	10 U	10 U	10 U
<i>Pesticides</i>						
alpha-BHC	µg/L	0.050 U	0.050 U	0.060	0.050 U	0.040 J
beta-BHC	µg/L	0.050 U	0.050 U	0.050 U	0.050 U	0.13
delta-BHC	µg/L	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U
gamma-BHC (Lindane)	µg/L	0.050 U	0.050 U	0.028 J	0.050 U	0.050 U
<i>Metals</i>						
Arsenic	µg/L	10 U	10 U	1.8 J	10 U	2.9 J
Mercury	µg/L	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U

Notes:

J - Estimated.

U - Not detected.

TABLE 3

ANALYTICAL METHOD SUMMARY
SEMI-ANNUAL GROUNDWATER SAMPLING
102ND STREET LANDFILL
NIAGARA FALLS, NEW YORK
OCTOBER 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
 OCTOBER 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	146	85-120	PCM-041009	Benzene	25	µg/L	J
	Bromofluorobenzene	144	75-120		1,2-Dichlorobenzene	18	µg/L	J

Notes:

J Estimated.
 VOCs Volatile Organic Compounds.

TABLE 5

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

<i>Parameter</i>	<i>Analysis Date</i>	<i>Analyte</i>	<i>Blank Result</i>	<i>Sample ID</i>	<i>Sample Result (ug/L)</i>	<i>Qualified Result (ug/L)</i>
Metals	11/02/09	Arsenic	2.6 J	PCM-041009	2.6 J	10 U

Notes:

J Estimated.
 U Not detected.

TABLE 6

QUALIFIED SAMPLE RESULTS DUE TO OUTLYING LABORATORY CONTROL SAMPLE (LCS)/ LABORATORY CONTROL SAMPLE DUPLICATE (LCSD) RECOVERIES
 SEMI-ANNUAL GROUNDWATER SAMPLING
 102ND STREET LANDFILL
 NIAGARA FALLS, NEW YORK
 OCTOBER 2009

<i>Parameter</i>	<i>Sample ID</i>	<i>Analyte</i>	<i>LCS</i>	<i>LCSD</i>	<i>RPD</i>	<u><i>Control Limits</i></u>		<i>Sample Result</i>	<i>Units</i>	<i>Qualifier</i>
			<i>Recovery</i>	<i>Recovery</i>		<i>Recovery</i>	<i>RPD</i>			
			(percent)	(percent)	(percent)	(percent)	(percent)			
SVOCs	PCM-031009	2,4-Dichlorophenol	80	52	42	50-105	40	11	µg/L	J

Notes:

J Estimated.
 LCS Laboratory Control Sample.
 LCSD Laboratory Control Sample Duplicate.
 RPD Relative Percent Difference.
 SVOCs Semi-volatile Organic Compounds.

ATTACHMENT A

CHAIN OF CUSTODY DOCUMENTS

Due Date: 11/9/09

CHAIN-OF-CUSTODY/Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Client Information	
Glenn Springs Holdings, Inc.	Report To: Paul McMahon
Love Canal	Copy To: pmcmahon@craworld.com
805 97th Street	
Niagara Falls, NY 14304	Invoice To:
Phone: 716-283-0111	PO:
Fax: 716-283-2856	Project Name: 102nd Street
Email: darrell_crockett@oxy.com	Project Number: 1431

Lab Information	
Laboratory: MITKEM CORPORATION	
Laboratory Location: 175 Metro Center Blvd. Warwick, RI 02886	
Laboratory Contact:	
Requested Due Date:	TAT: 10
QA/QC Requirements:	

Event Information	
ID#: 102nd St-OCTOBER2009-01-1	
SSOW Ref#: 274-402-999-3100	
Sampler Name: <i>Sharon McMahon</i>	

Valid Matrix Code
WG Groundwater
WB Borehole Water
WS Surface Water
SO Soil
SE Sediment

Sample Condition

Temp in C	
Received on ice	Y/N
Sealed Cooler	Y/N
Samples Intact	Y/N

Sample Identification

	Matrix Code	Date Collected	Time Collected	As/MeC-(HNO3)	BHC-(none)	SVOCs-(none)	VOCs-(HCl)	Remarks
1 PCBM-011009	WG	10/21/2009	13:00	1	2	2	3	MS/MSD
2 PCBM-021009	WG	10/21/2009	13:30	1	2	2	3	
3 PCBM-031009	WG	10/21/2009	09:45	1	2	2	3	
4 PCM-011009	WG	10/21/2009	11:15	1	2	2	3	
5 PCM-081009	WG	10/21/2009	10:15	1	2	2	3	
6 PCM-101009	WG	10/21/2009	11:00	1	2	2	3	
7 PCM-121009	WG	10/21/2009	15:00	1	2	2	3	
8 TB-102ND-102109	WG Q	10/21/2009	00:00	0	0	0	2	
Total Bottles				7	14	14	23	Grand Total:58

SHIPMENT METHOD	NO. OF COOLERS	RELINQUISHED BY:	DATE	TIME	RECIEVED BY:	DATE	TIME
UPS	4	<i>Sharon McMahon</i>	10/21/09	1645	<i>Anthony Deth</i>	10/22/09	9:30
AIRBILL#:							

2'C, 0'C, 1'C, 2'C,

CRA

EVENT COMPLETE

Du Date: 11/9/09

CHAIN-OF-CUSTODY/Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Client Information	
Glenn Springs Holdings, Inc.	Report To: Paul McMahon
Love Canal	Copy To: pmcmahon@craworld.com
805 97th Street	
Niagara Falls, NY 14304	Invoice To:
Phone: 716-283-0111	PO:
Fax: 716-283-2856	Project Name: 102nd Street
Email: darrell_crockett@oxy.com	Project Number: 1431

Lab Information	
Laboratory: MITKEM CORPORATION	
Laboratory Location: 175 Metro Center Blvd. Warwick, RI 02886	
Laboratory Contact:	
Requested Due Date:	TAT: 10
QA/QC Requirements:	

Event Information	
ID#: 102ndOCTOBER2009-02-1	
SSOW Ref#: 274-402-999-3100	
Sampler Name: <i>Shawn Haudner</i>	

Sample Identification	Valid Matrix Code WG Groundwater WB Borehole Water WS Surface Water SO Soil SE Sediment	Matrix Code	Date Collected	Time Collected	As/MsC-(HNO3)	BHC-(none)	SVOCs-(none)	VOCs-(HCl)	Sample Condition	
									Temp in C	
									Received on ice	Y/N
									Sealed Cooler	Y/N
									Samples Intact	Y/N
Remarks										
PCM-021009		WG	10/23/2009	10:15	1	2	2	3		
PCM-031009		WG	10/23/2009	10:30	1	2	2	3		
PCM-041009		WG	10/23/2009	11:30	1	2	2	3		
PCM-051009		WG	10/23/2009	11:45	1	2	2	3		
PCM-071009		WG	10/23/2009	09:00	1	1	1	3		
TB-102ND102309		WG Q	10/23/2009	00:00	0	0	0	2		
Total Bottles					5	9	9	17	Grand Total:40	

SHIPMENT METHOD	NO. OF COOLERS	RELINQUISHED BY:	DATE	TIME	RECIEVED BY:	DATE	TIME
UPS	2	<i>Shawn Haudner</i>	10/23/09	1315	<i>Agnir Hutter</i>	10/24/09	9:50
AIRBILL#:							

2°C, 3°C

ATTACHMENT B

GRAPHICAL PRESENTATION
CHEMICAL CONCENTRATION VERSUS TIME

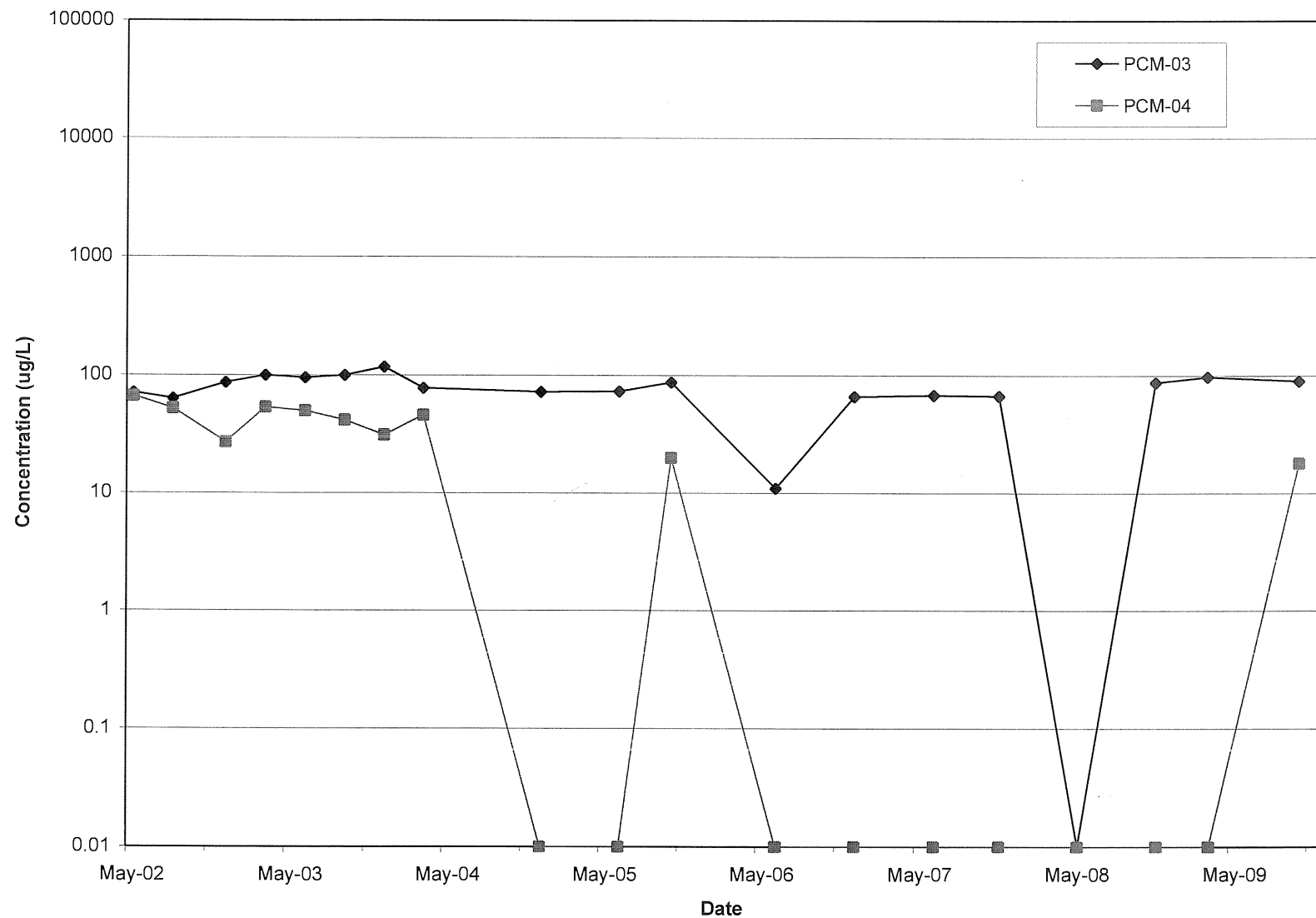


figure 1
CONCENTRATION OF 1,2-DICHLOROBENZENE vs. TIME
102ND STREET LANDFILL



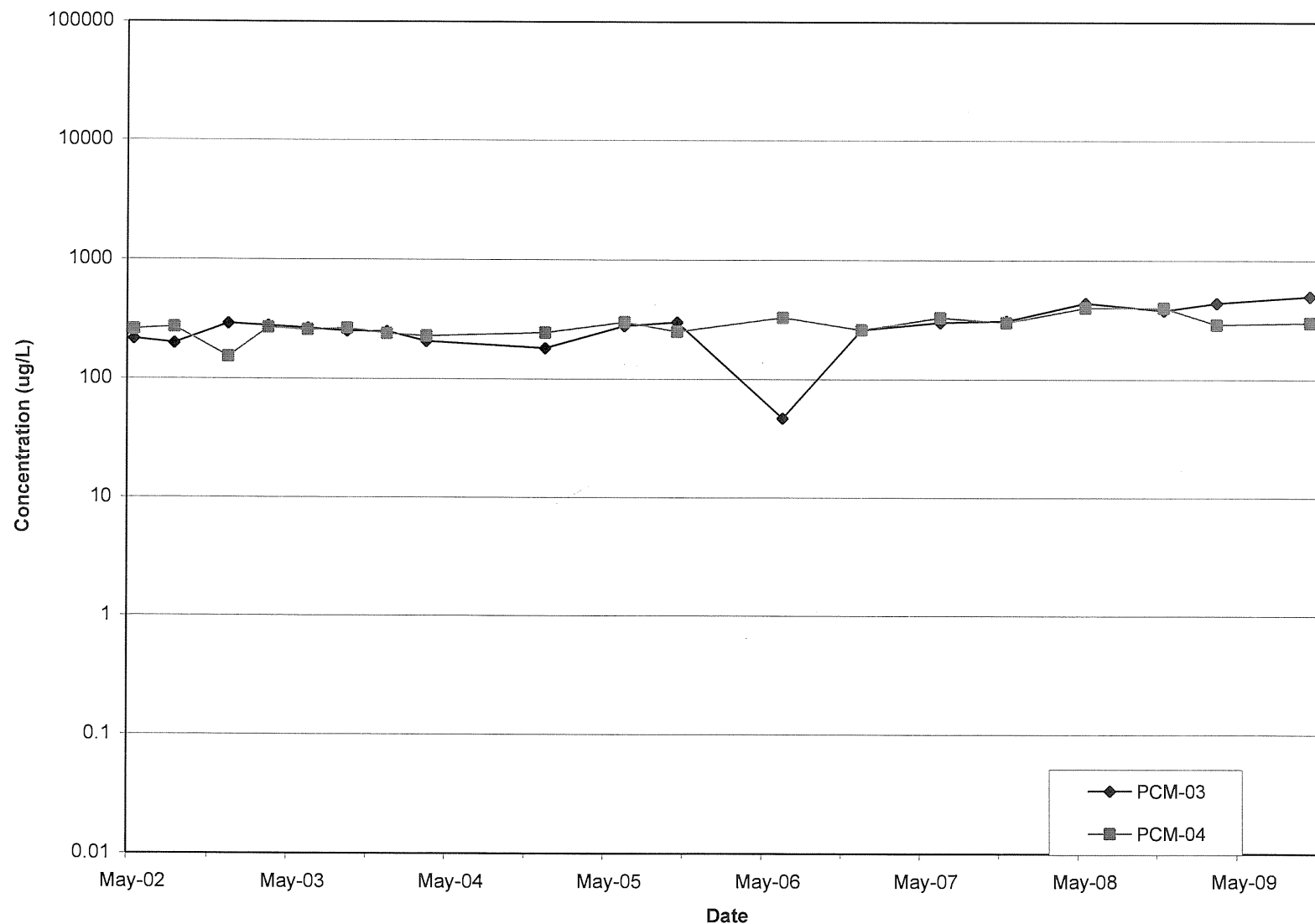


figure 2
CONCENTRATION OF 1,4-DICHLOROBENZENE vs. TIME
102ND STREET LANDFILL



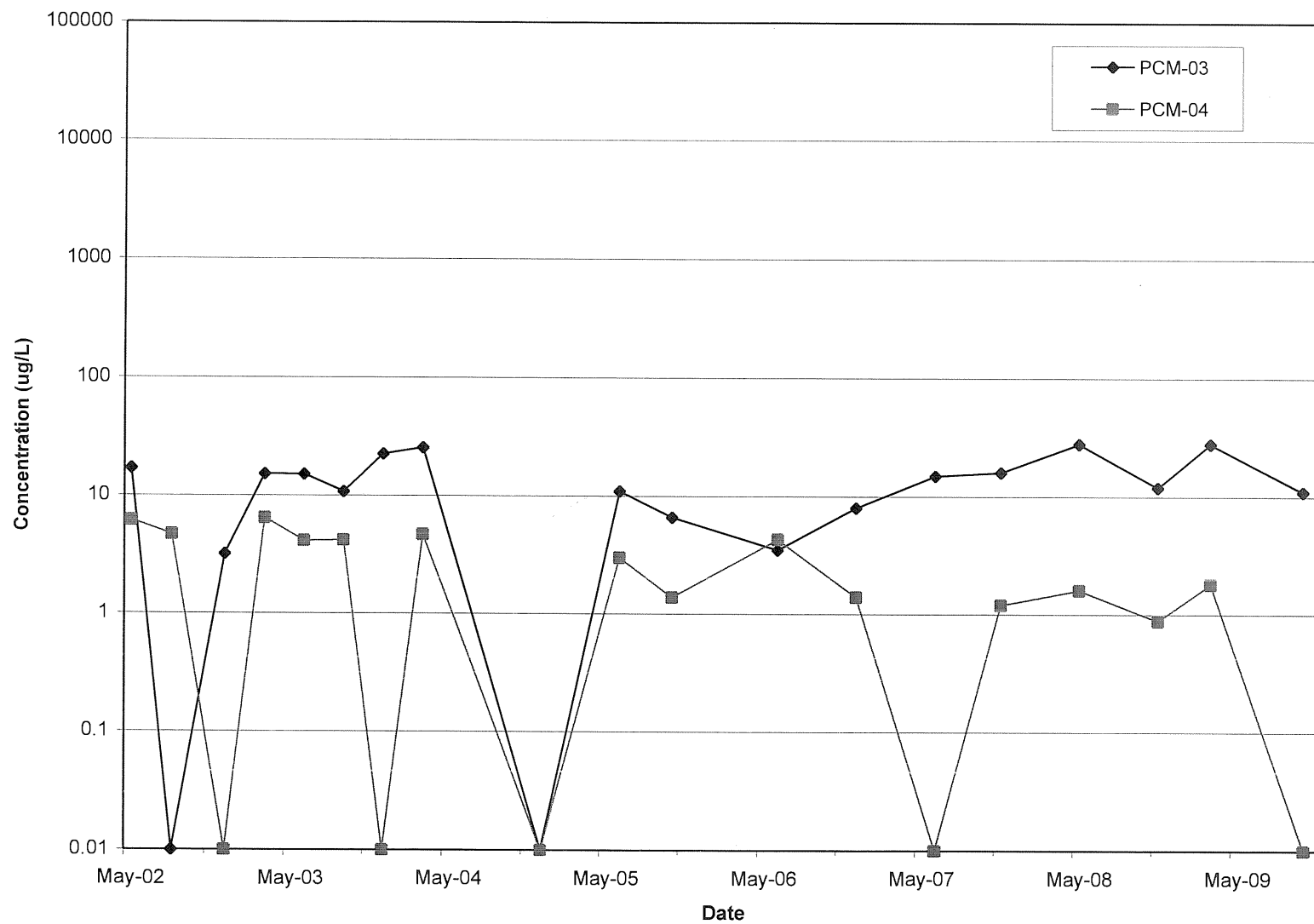


figure 3
CONCENTRATION OF 2,4-DICHLOROPHENOL vs. TIME
102ND STREET LANDFILL



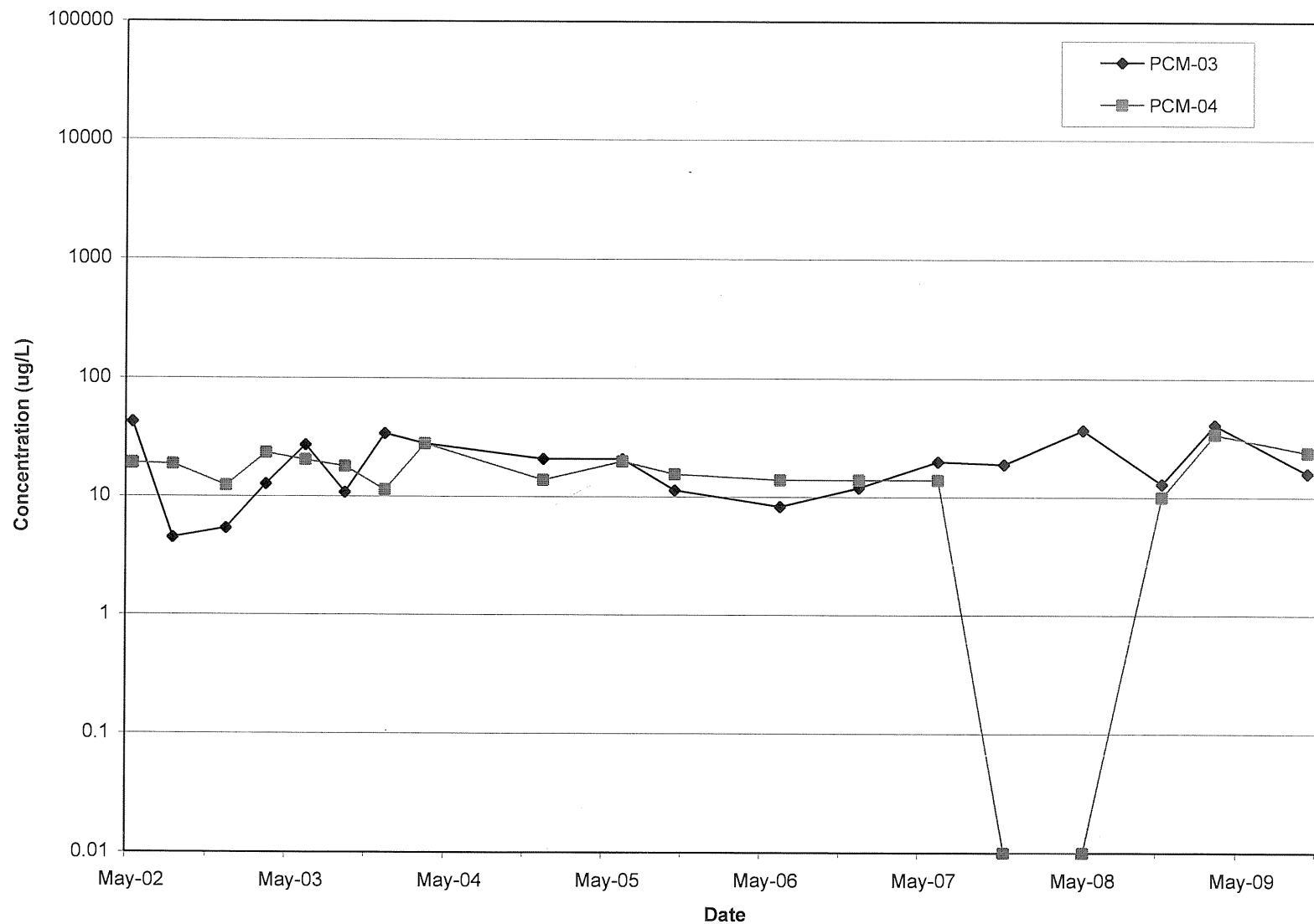


figure 4
CONCENTRATION OF 2-CHLOROPHENOL vs. TIME
102ND STREET LANDFILL



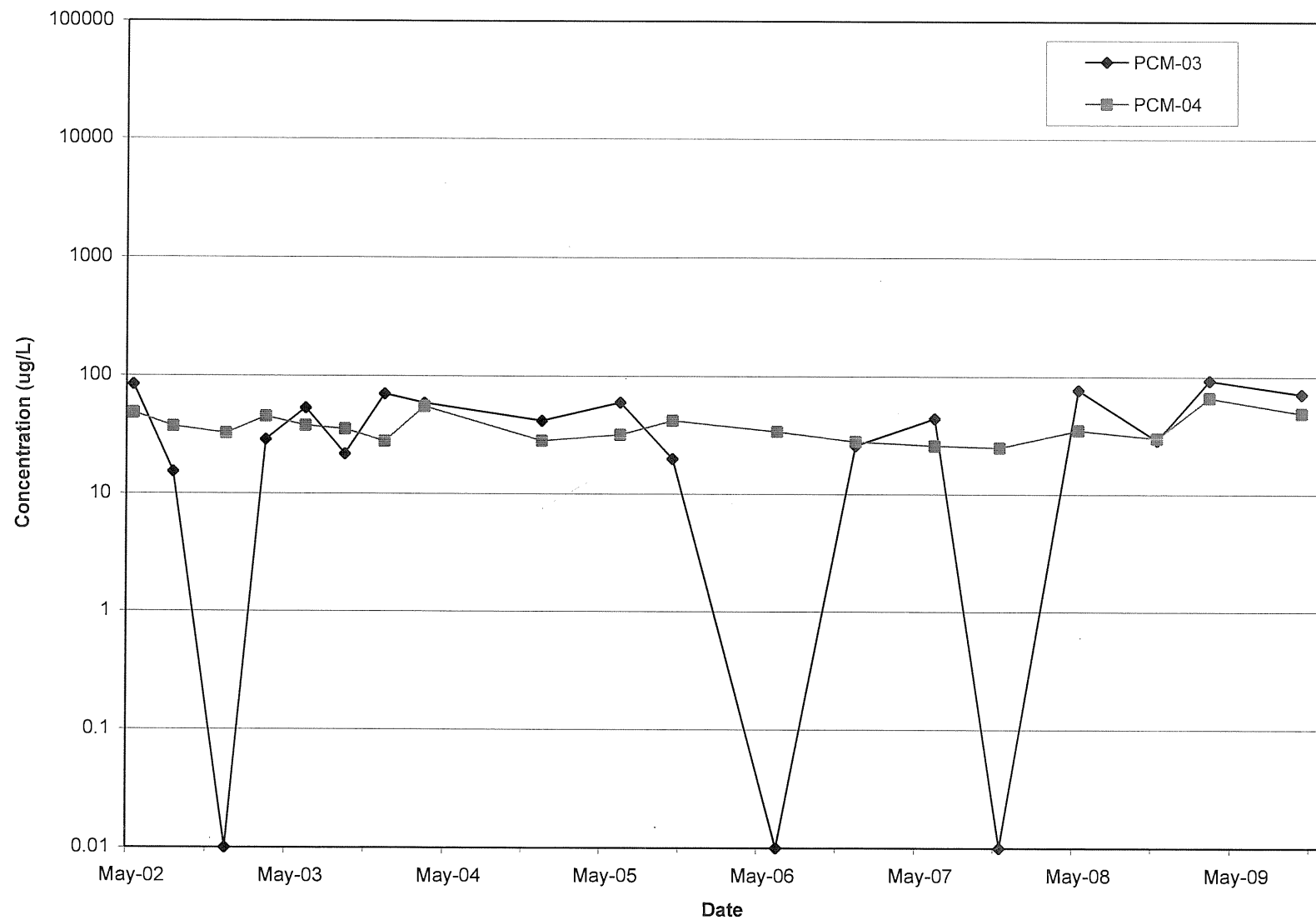


figure 5
CONCENTRATION OF 4-CHLOROPHENOL vs. TIME
102ND STREET LANDFILL



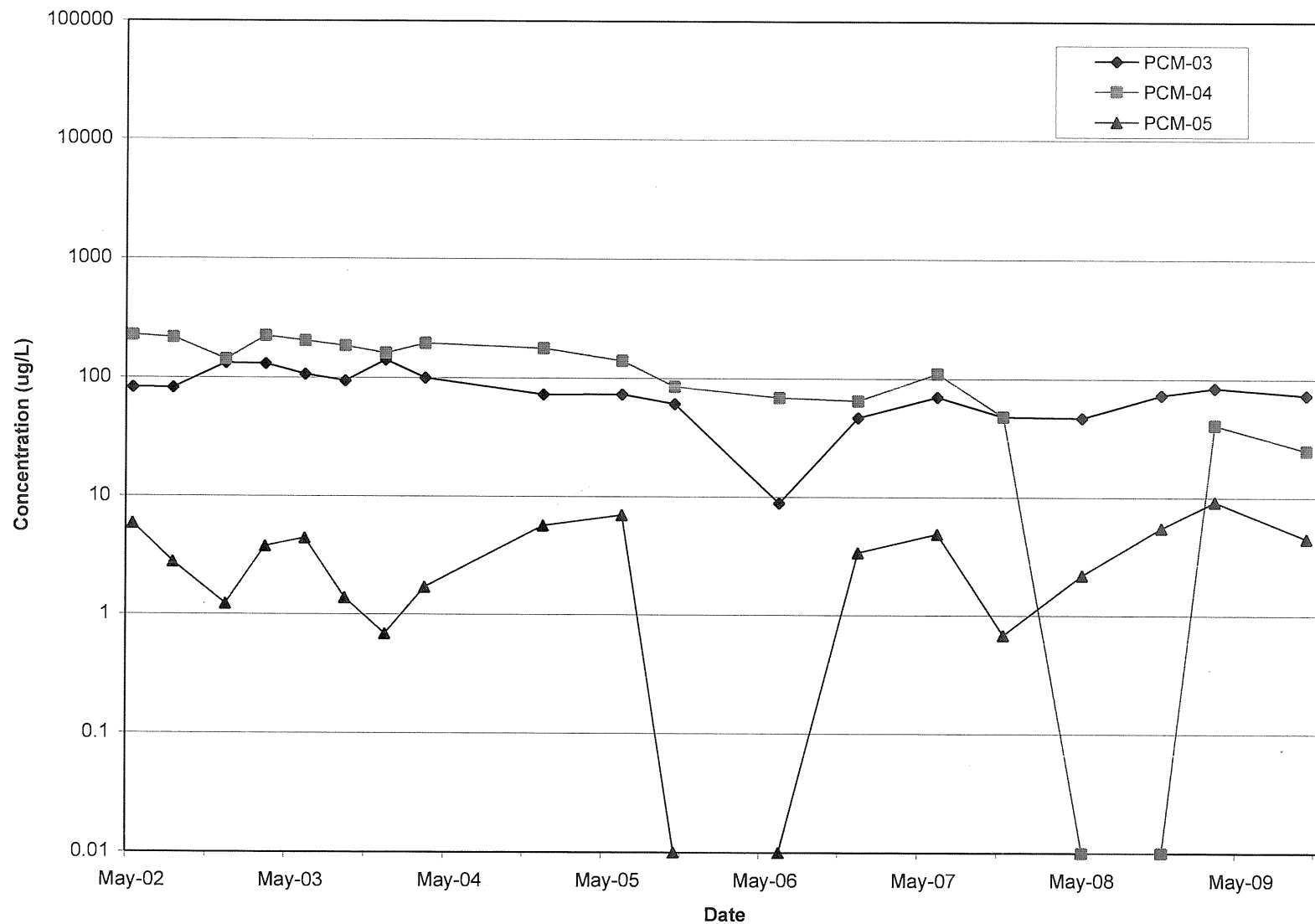


figure 6
CONCENTRATION OF BENZENE vs. TIME
102ND STREET LANDFILL



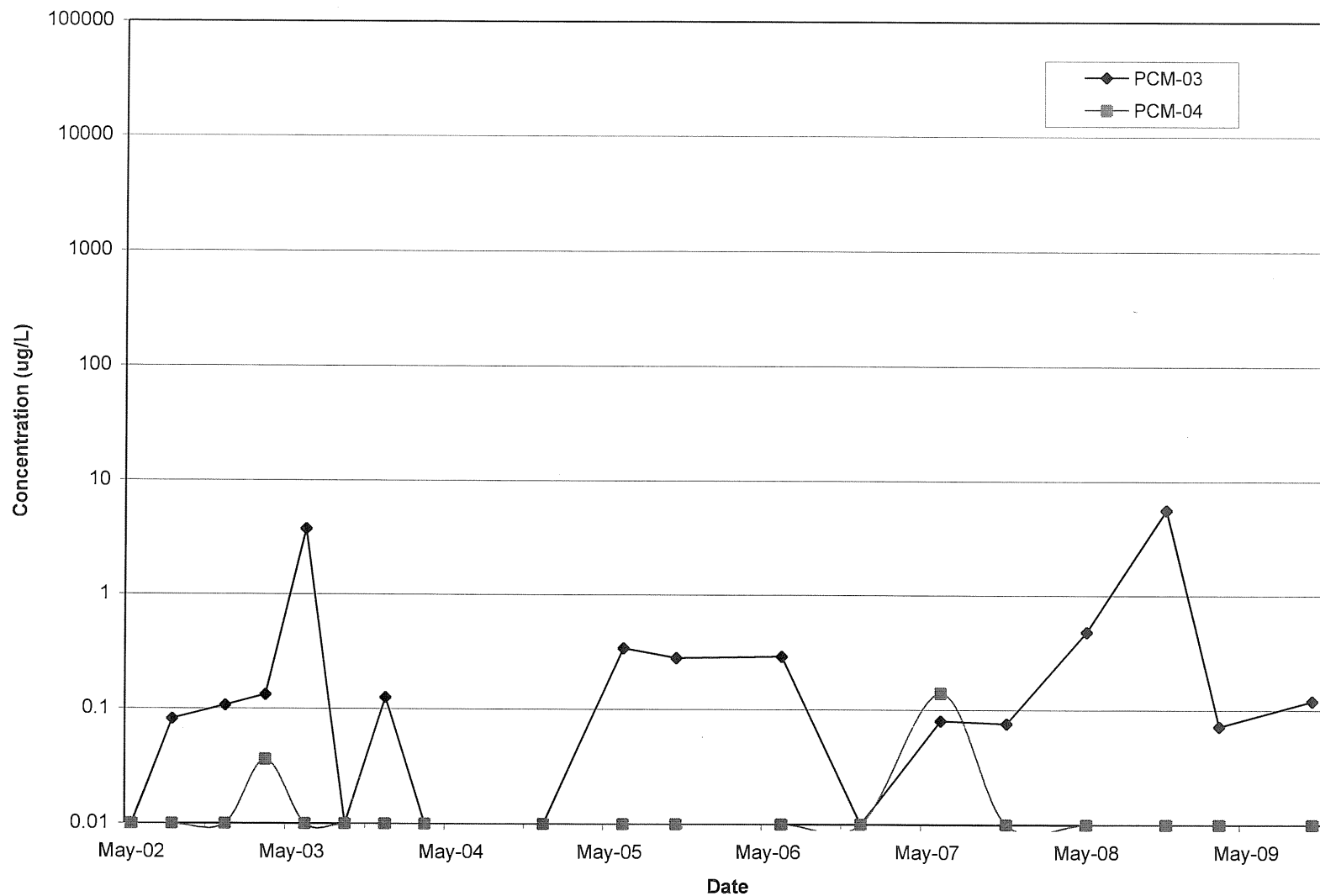


figure 7
CONCENTRATION OF BETA-BHC vs. TIME
102ND STREET LANDFILL



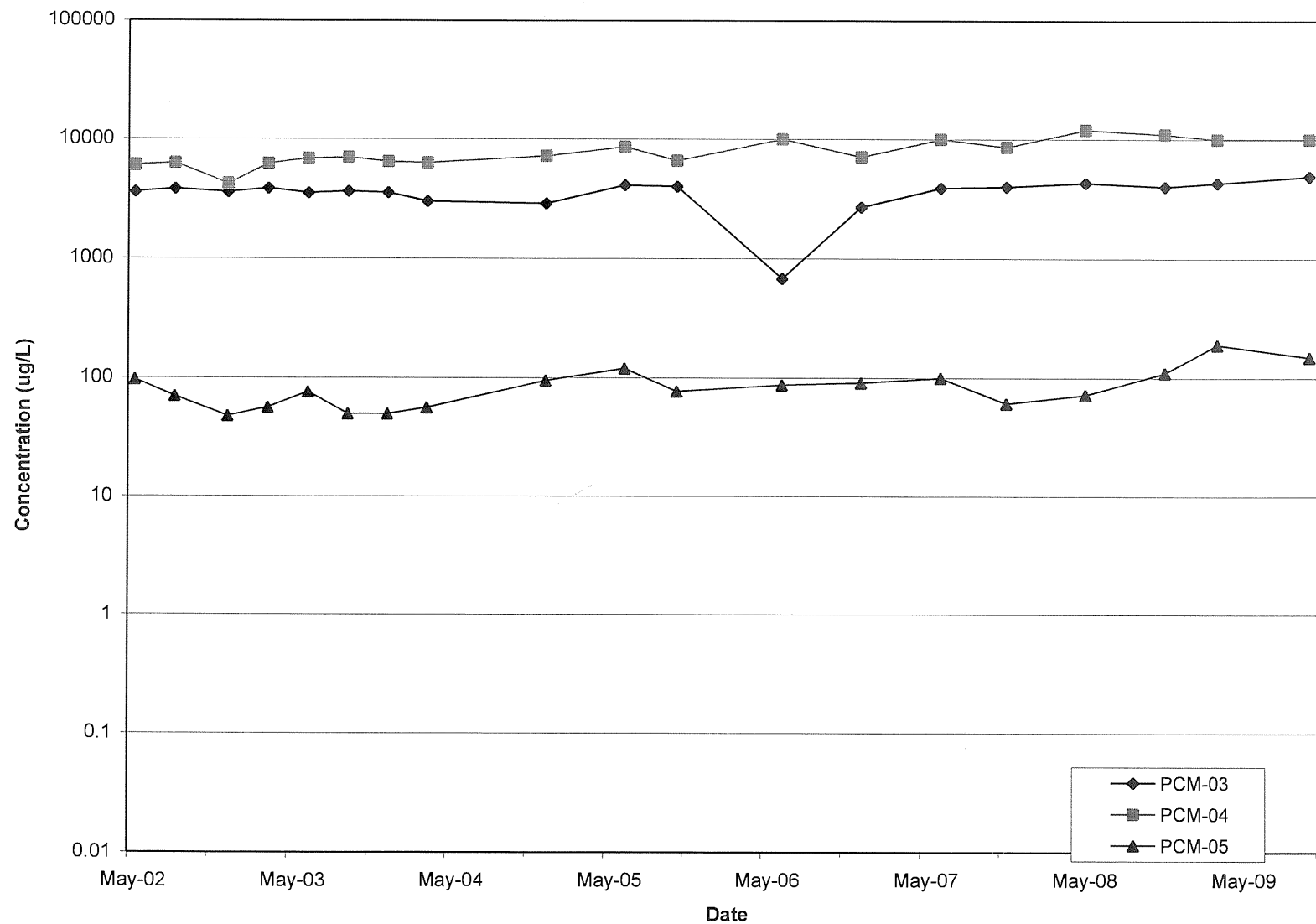


figure 8
CONCENTRATION OF CHLOROBENZENE vs. TIME
102ND STREET LANDFILL



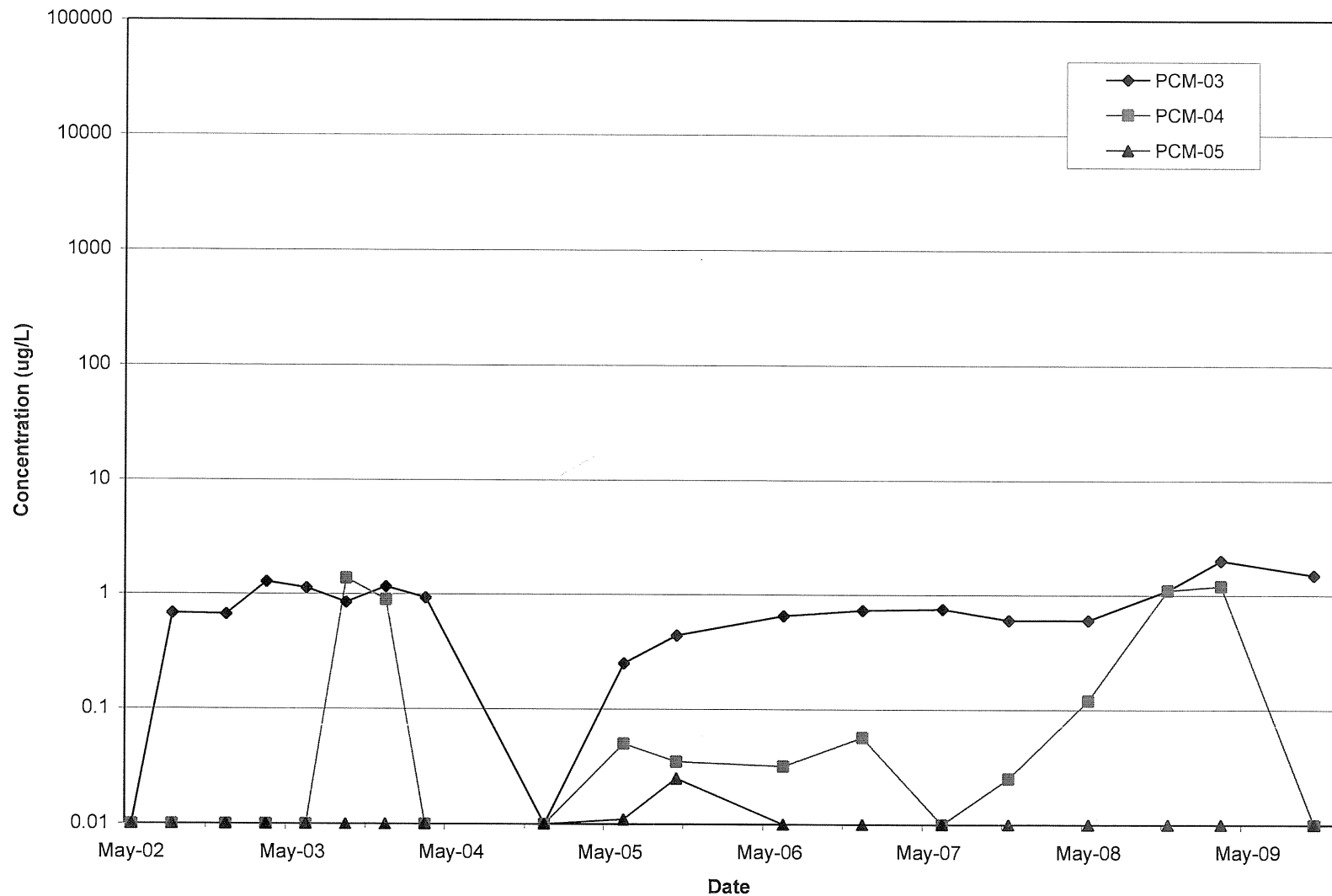


figure 9
CONCENTRATION OF DELTA-BHC vs. TIME
102ND STREET LANDFILL



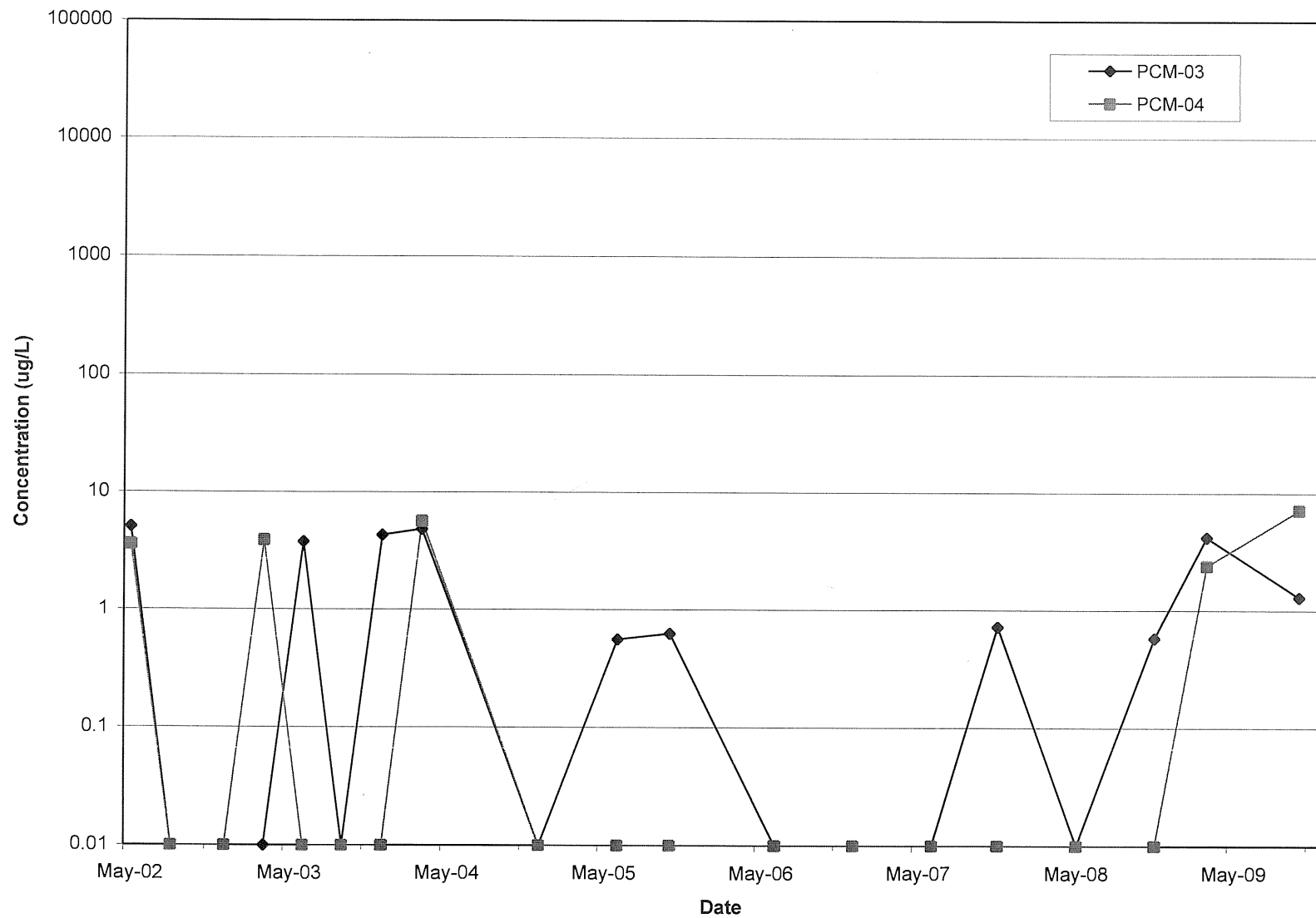


figure 10
CONCENTRATION OF PHENOL vs. TIME
102ND STREET LANDFILL

