



Glenn Springs Holdings, Inc.

A subsidiary of Occidental Petroleum

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December 9, 2010

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 2010
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 2010. 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, P.G.
Environmental Remediation Group
Olin Corporation
423-336-4587

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972-687-7506

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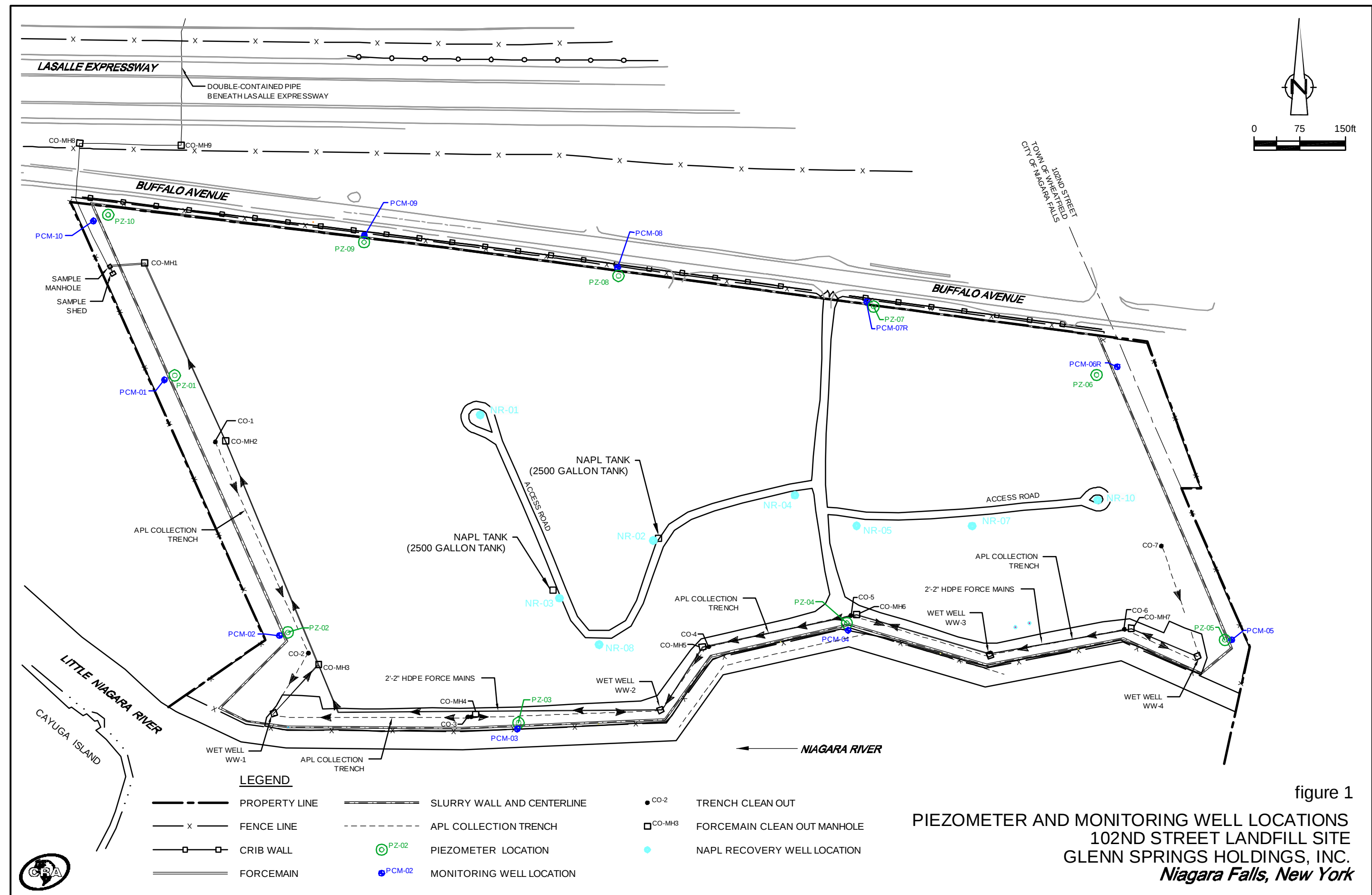


figure 1

E-Mail Date: November 19, 2010
E-Mail To: Mike Bellotti; Clint Babcock;
Dennis Hoyt; Jane Polovich;
Shawn McEvoy; 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 2010

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 2010 and delivered to TestAmerica in Pittsburgh, Pennsylvania (TA) 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 Sheri Finn 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. Most samples were properly preserved and all were received chilled. The metals bottle for sample PCM-02-1010 was received above the required pH, and the associated sample results were qualified as estimated (see Table 4).

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.

All surrogate spike recoveries were acceptable per the "Guidelines", indicating good analytical efficiency.

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. Most recoveries and relative percent differences (RPDs) were acceptable, demonstrating good analytical accuracy and precision. Some high VOC MS/MSD recoveries were reported. All associated sample results were non-detect and were not impacted by the indicated high bias. One low pesticide MSD recovery and high RPD were reported for one compound; the associated sample result was non-detect and was not qualified based on the acceptable MS recovery.

Laboratory Control Sample (LCS) Analyses

LCSs were analyzed for all parameters. Most recoveries were acceptable, indicating good analytical accuracy and precision. Two high VOC LCS recoveries were reported. All associated sample results were non-detect and were not impacted by the indicated high bias.

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

One trip blank was collected for the program. The trip blank was analyzed for VOCs, and all results were non-detect.

Pesticide Dual Column Variability

The laboratory qualified three detected pesticide results because there was some variability between the data reported from the dual column analyses. These data were qualified as estimated (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
OCTOBER 2010**

<i>Sample ID</i>	<i>Location I.D.</i>	<i>Collection Date</i>	<i>Collection Time</i>	<i>Analysis/Parameters</i>				<i>Depth to Water ⁽¹⁾ (ft. BTOC)</i>	<i>Comment</i>
				<i>BHCs</i>	<i>VOCs</i>	<i>Metals</i>	<i>SVOCs</i>		
PCBM-01-1010	PCBM-01	10/9/2010	1:15:00 PM	X	X	X	X	12.73	Duplicate of PCBM-01-1010 MS/MSD
PCM-12-1010	PCBM-01	10/9/2010	1:00:00 PM	X	X	X	X	12.73	
PCBM-02-1010	PCBM-02	10/9/2010	9:30:00 AM	X	X	X	X	12.00	
PCBM-03-1010	PCBM-03	10/9/2010	3:10:00 PM	X	X	X	X	16.26	
PCM-03-1010	PCM-03	10/9/2010	1:20:00 PM	X	X	X	X	12.98	
PCM-04-1010	PCM-04	10/9/2010	11:30:00 AM	X	X	X	X	11.66	Trip Blank
PCM-05-1010	PCM-05	10/9/2010	8:35:00 AM	X	X	X	X	12.74	
TRP102-100910	-	10/9/2010	4:38:00 PM		X			-	
PCM-01-1010	PCM-01	10/11/2010	1:00:00 PM	X	X	X	X	12.41	
PCM-02-1010	PCM-02	10/11/2010	2:15:00 PM	X	X	X	X	11.29	
PCM-06-1010	PCM-06	10/11/2010	10:45:00 AM		X			11.98	Limited Sample Volume
PCM-07R-1010	PCM-07R	10/11/2010	11:45:00 AM	X	X	X	X	13.39	
PCM-08-1010	PCM-08	10/11/2010	10:35:00 AM	X	X	X	X	10.03	
PCM-10-1010	PCM-10	10/11/2010	1:00:00 PM	X	X	X	X	13.28	

Notes:

⁽¹⁾ Niagara River water level for September 16, 2010 was 563.67 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 2010

<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-01-1010</i>	<i>PCM-12-1010</i>	<i>PCBM-02-1010</i>	<i>PCBM-03-1010</i>	<i>PCM-01-1010</i>	<i>PCM-02-1010</i>	<i>PCM-03-1010</i>
<i>Sample Date:</i>		<i>10/9/2010</i>	<i>10/9/2010</i>	<i>10/9/2010</i>	<i>10/9/2010</i>	<i>10/11/2010</i>	<i>10/11/2010</i>	<i>10/9/2010</i>
<i>Parameters</i>	<i>Units</i>		<i>(Duplicate)</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	200 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	200 U
1,2-Dichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	66 J
1,4-Dichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	340
2-Chlorotoluene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	200 U
Benzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.12 J	50 J
Chlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.16 J	3500
<i>Semi-volatile Organic Compounds</i>								
1,2,4,5-Tetrachlorobenzene	µg/L	9.6 U	9.4 U	9.5 U	9.4 U	9.4 U	9.5 U	9.6 U
2,4,5-Trichlorophenol	µg/L	9.6 U	9.4 U	9.5 U	9.4 U	9.4 U	9.5 U	9.6 U
2,4-Dichlorophenol	µg/L	9.6 U	9.4 U	9.5 U	9.4 U	9.4 U	9.5 U	18
2,5-Dichlorophenol	µg/L	9.6 U	9.4 U	9.5 U	9.4 U	9.4 U	9.5 U	9.6 U
2-Chlorophenol	µg/L	9.6 U	9.4 U	9.5 U	9.4 U	9.4 U	9.5 U	14
4-Chlorophenol	µg/L	9.6 U	9.4 U	9.5 U	9.4 U	9.4 U	9.5 U	31
Phenol	µg/L	9.6 U	9.4 U	9.5 U	9.4 U	9.4 U	9.5 U	1.7 J
<i>Pesticides</i>								
alpha-BHC	µg/L	0.048 U	0.048 U	0.048 U	0.048 U	0.047 U	0.045 J	0.048 U
beta-BHC	µg/L	0.048 U	0.048 U	0.048 U	0.048 U	0.047 U	0.047 U	0.046 J
delta-BHC	µg/L	0.048 U	0.048 U	0.048 U	0.048 U	0.047 U	0.047 U	0.59
gamma-BHC (lindane)	µg/L	0.048 U	0.048 U	0.048 U	0.048 U	0.047 U	0.047 U	0.048 U
<i>Metals</i>								
Arsenic	µg/L	10.0 U	10.0 U	10.0 U	10.0 U	6.6 J	2.7 J	10.0 U
Mercury	µg/L	0.20 U	0.20 U	0.20 U	0.20 U	0.060 J	0.20 UJ	0.20 U

TABLE 2

**ANALYTICAL RESULTS SUMMARY
SEMI-ANNUAL GROUNDWATER SAMPLING
102ND STREET LANDFILL
NIAGARA FALLS, NEW YORK
OCTOBER 2010**

		<i>Sample Location:</i>	<i>PCM-04</i>	<i>PCM-05</i>	<i>PCM-06</i>	<i>PCM-07R</i>	<i>PCM-08</i>	<i>PCM-10</i>
		<i>Sample ID:</i>	<i>PCM-04-1010</i>	<i>PCM-05-1010</i>	<i>PCM-06-1010</i>	<i>PCM-07R-1010</i>	<i>PCM-08-1010</i>	<i>PCM-10-1010</i>
		<i>Sample Date:</i>	<i>10/9/2010</i>	<i>10/9/2010</i>	<i>10/11/2010</i>	<i>10/11/2010</i>	<i>10/11/2010</i>	<i>10/11/2010</i>
<i>Parameters</i>	<i>Units</i>							
<i>Volatile Organic Compounds</i>								
1,2,3-Trichlorobenzene	µg/L		500 U	5.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	µg/L		500 U	5.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	µg/L		500 U	5.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	µg/L		210 J	5.0 U	1.0 U	1.0 U	1.0 U	1.0 U
2-Chlorotoluene	µg/L		500 U	5.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Benzene	µg/L		500 U	1.8 J	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	µg/L		7700	100	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		9.5 U	9.5 U	-	9.6 U	9.4 U	9.5 U
2,4,5-Trichlorophenol	µg/L		9.5 U	9.5 U	-	9.6 U	9.4 U	9.5 U
2,4-Dichlorophenol	µg/L		0.98 J	9.5 U	-	9.6 U	9.4 U	9.5 U
2,5-Dichlorophenol	µg/L		9.5 U	9.5 U	-	9.6 U	9.4 U	9.5 U
2-Chlorophenol	µg/L		14	9.5 U	-	9.6 U	9.4 U	9.5 U
4-Chlorophenol	µg/L		27	9.5 U	-	9.6 U	9.4 U	9.5 U
Phenol	µg/L		9.5 U	9.5 U	-	9.6 U	9.4 U	9.5 U
<i>Pesticides</i>								
alpha-BHC	µg/L		0.048 U	0.048 U	-	0.053 J	0.048 U	0.055 J
beta-BHC	µg/L		0.048 U	0.048 U	-	0.048 U	0.048 U	0.048 U
delta-BHC	µg/L		0.13 J	0.048 U	-	0.048 U	0.048 U	0.048 U
gamma-BHC (lindane)	µg/L		0.048 U	0.048 U	-	0.048 U	0.048 U	0.048 U
<i>Metals</i>								
Arsenic	µg/L		10.0 U	6.7 J	-	-	10.0 U	10.0 U
Mercury	µg/L		0.060 J	0.20 U	-	-	0.20 U	0.20 U

Notes:

J - Estimated concentration.

U - Not present at or above the associated value.

UJ - Estimated reporting limit.

- Not analyzed.

TABLE 3

ANALYTICAL METHOD SUMMARY
SEMI-ANNUAL GROUNDWATER SAMPLING
102ND STREET LANDFILL
NIAGARA FALLS, NEW YORK
OCTOBER 2010

<i>Analyses</i>	<i>Methodology ⁽¹⁾</i>	<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.

SVOCs Semi-Volatile Organic Compounds.

VOCs Volatile Organic Compounds.

TABLE 4

**QUALIFIED SAMPLE RESULTS DUE TO INADEQUATE PRESERVATION
SEMI-ANNUAL GROUNDWATER SAMPLING
102ND STREET LANDFILL
NIAGARA FALLS, NEW YORK
OCTOBER 2010**

<i>Parameter</i>	<i>Sample ID</i>	<i>Analyte</i>	<i>pH Upon Receipt at Laboratory</i>	<i>Required pH</i>	<i>Qualified Sample Result</i>	<i>Units</i>
Metals	PCM-02-1010	Arsenic	7	<2	2.7 J	µg/L
		Mercury	7	<2	0.20 UJ	µg/L

Notes:

J Estimated concentration.
 UJ Estimated reporting limit.

TABLE 5

**QUALIFIED SAMPLE RESULTS DUE TO DIFFERENCES IN DUAL COLUMN RESULTS
SEMI-ANNUAL GROUNDWATER SAMPLING
102ND STREET LANDFILL
NIAGARA FALLS, NEW YORK
OCTOBER 2010**

<i>Parameter</i>	<i>Compound</i>	<i>Associated Sample ID</i>	<i>%D</i>	<i>Qualified Sample Results</i>	<i>Units</i>
Pesticides	delta-BHC	PCM-04-1010	>40%	0.13 J	µg/L
	alpha-BHC	PCM-07R-1010	>40%	0.053 J	µg/L
	alpha-BHC	PCM-10-1010	>40%	0.055 J	µg/L

Notes:

%D Percent difference.

J Estimated concentration.

ATTACHMENT A

CHAIN OF CUSTODY DOCUMENTS

CHAIN-OF-CUSTODY/Analytical Request Document

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

Client Information	
GSH	Report To: PMcmahon@craworld.com
805 97th Street	Copy To:
Love Canal	
Niagara Falls, NY 14304	Invoice To: PMcmahon@craworld.com
Phone: 716-283-0111	PO:
Fax:	Project Name: 102nd Street
Email: PMcmahon@craworld.com	Project Number: 53716-05-03

Lab Information	
Laboratory: Test America	
Laboratory Location: 301 Alpha Drive Pittsburgh, PA 15238 412-963-7058	
Laboratory Contact: Dave Dunlap	
Requested Due Date:	TAT:
QA/QC Requirements:	

Event Information	
ID#: 102nd-semi-1-1	
SSOW Ref#:	
Sampler Name: David Tyran	

Sample Identification	Valid Matrix Code WG Groundwater WB Borehole Water WS Surface Water SO Soil SE Sediment	Matrix Code	Date Collected	Time Collected	As/MeC(HNO3)	BHC(none)	SVOCs(none)	VOCs(HCl)	Remarks
PCBM-01-1010		WG	10/09/2010	13:15	1	2	2	3	
PCBM-02-1010		WG	10/09/2010	09:30	3	6	6	9	MS/MSD
PCBM-03-1010		WG	10/09/2010	15:10	1	2	2	3	Default time applied
PCM-03-1010		WG	10/09/2010	13:20	1	2	2	3	
PCM-04-1010		WG	10/09/2010	11:30	1	2	2	3	
PCM-05-1010		WG	10/09/2010	08:35	1	2	2	3	
PCM-12-1010		WG	10/09/2010	13:00	1	2	2	3	
TRP102-100910		WG	10/09/2010	16:38	0	0	0	2	Default time applied
Total Bottles					9	18	18	29	Grand Total:74

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

SHIPMENT METHOD	NO. OF COOLERS	RELINQUISHED BY:	DATE	TIME	RECIEVED BY:	DATE	TIME
FedEx		<i>John Hardner</i>	10/11/10	1615	<i>David Tyran</i>	10/12/10	1000
AIRBILL#:							

EVENT COMPLETE

CHAIN-OF-CUSTODY/Analytical Request Document

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

Client Information	
GSH	Report To: PMcmahon@craworld.com
805 97th Street	Copy To:
Love Canal	
Niagara Falls, NY 14304	Invoice To: PMcmahon@craworld.com
Phone: 716-283-0111	PO:
Fax:	Project Name: 102nd Street
Email: PMcmahon@craworld.com	Project Number: 53716-05-03

Lab Information	
Laboratory: Test America	
Laboratory Location: 301 Alpha Drive Pittsburgh, PA 15238 412-963-7058	
Laboratory Contact: Dave Dunlap	
Requested Due Date:	TAT: 10
QA/QC Requirements:	

Event Information	
ID#: 102nd-semi-2-1	
SSOW Ref#:	
Sampler Name: <i>Shawn Hardner</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/MeC(HNO ₃)	BHC(none)	SVOCs(none)	VOCs(HCI)	Remarks
PCM-01-1010					WG	10/11/2010	13:00	1	2	2	3	
PCM-02-1010					WG	10/11/2010	14:15	1	2	2	3	
PCM-06-1010					WG	10/11/2010	10:45	0	0	0	3	
PCM-07R-1010					WG	10/11/2010	11:45	0	1	1	3	
PCM-08-1010					WG	10/11/2010	10:35	1	2	2	3	
PCM-10-1010					WG	10/11/2010	13:00	1	2	2	3	
Total Bottles								4	9	9	18	Grand Total:40

Sample Condition

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

SHIPMENT METHOD	NO. OF COOLERS	RELINQUISHED BY:	DATE	TIME	RECIEVED BY:	DATE	TIME
FedEx	5	<i>Shawn Hardner</i>	10/11/10	1615	<i>Dunlap</i>	10/12/10	1000
AIRBILL#:							

ATTACHMENT B

GRAPHICAL PRESENTATION
CHEMICAL CONCENTRATION VERSUS TIME

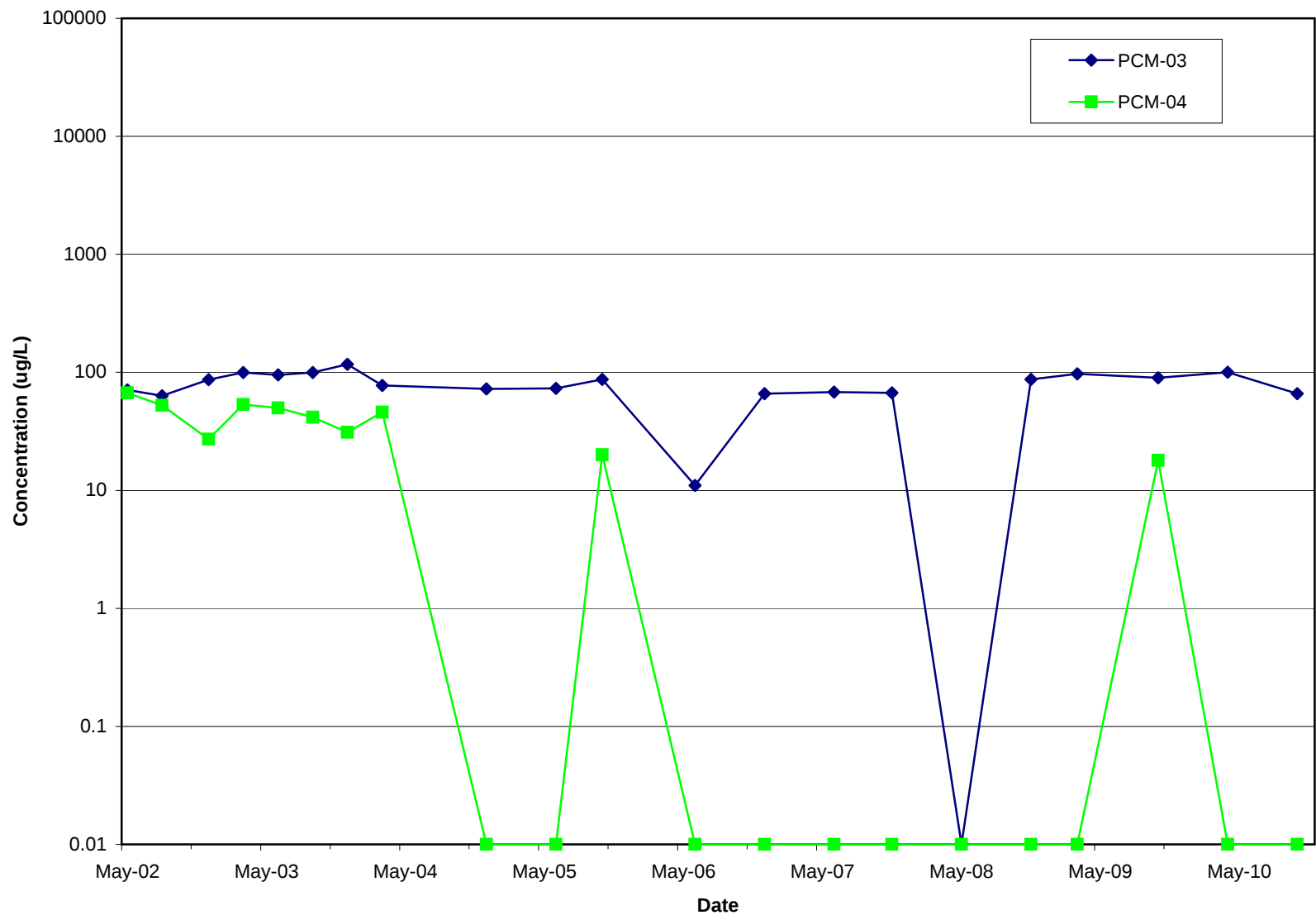


figure 1
CONCENTRATION OF 1,2-DICHLOROBENZENE vs. TIME
102ND STREET LANDFILL



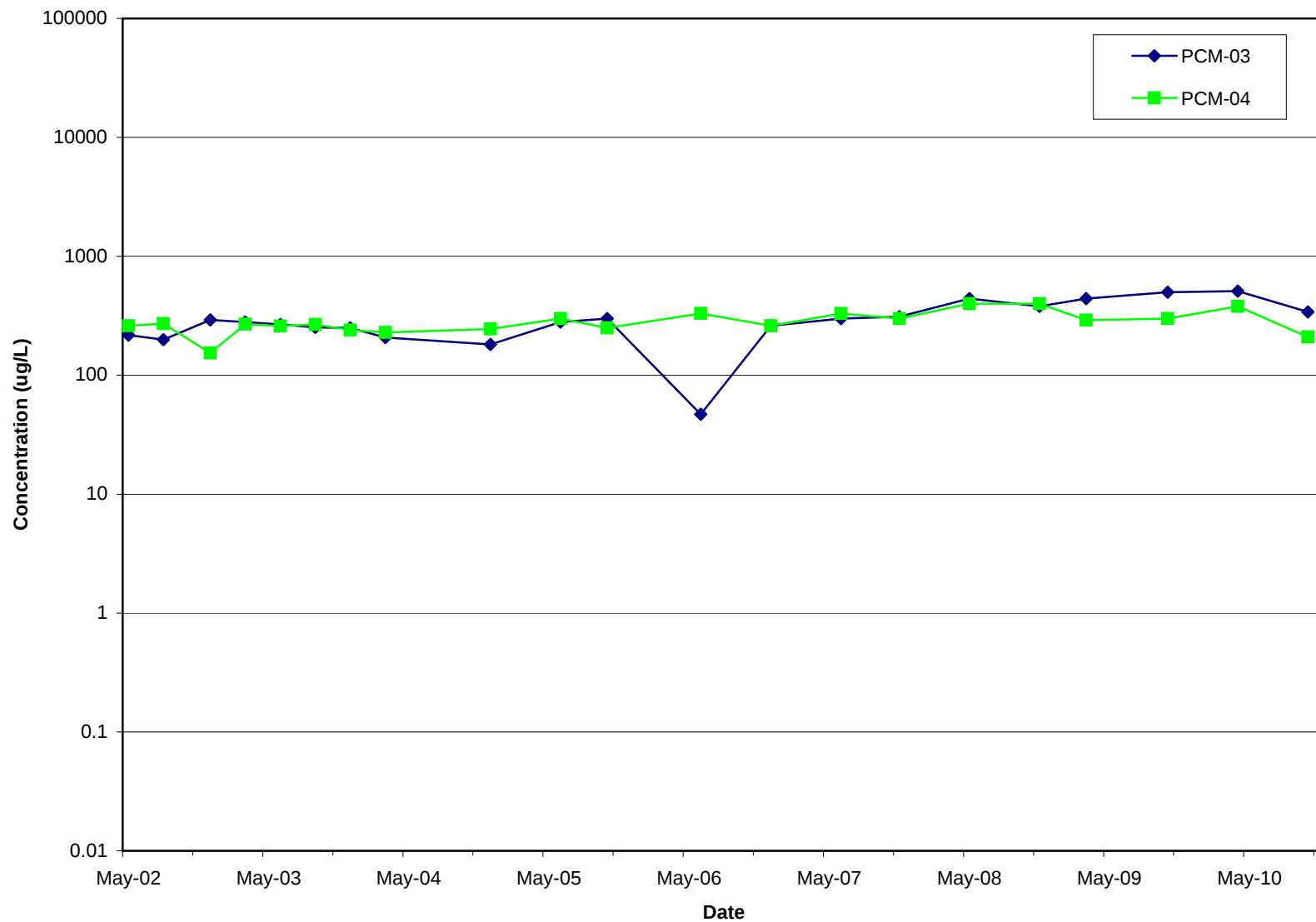


figure 2
CONCENTRATION OF 1,4-DICHLOROBENZENE vs. TIME
102ND STREET LANDFILL



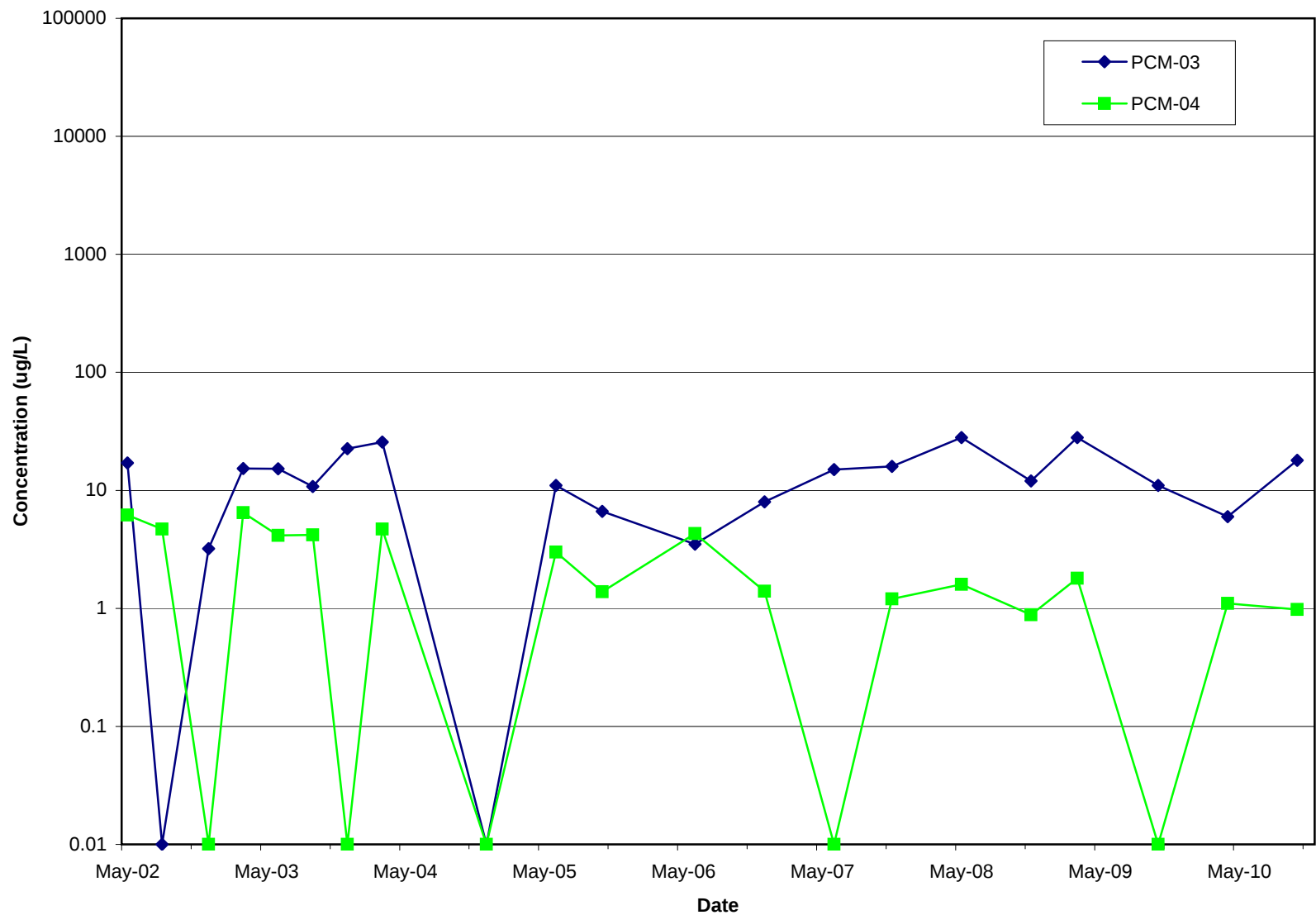


figure 3
CONCENTRATION OF 2,4-DICHLOROPHENOL vs. TIME
102ND STREET LANDFILL



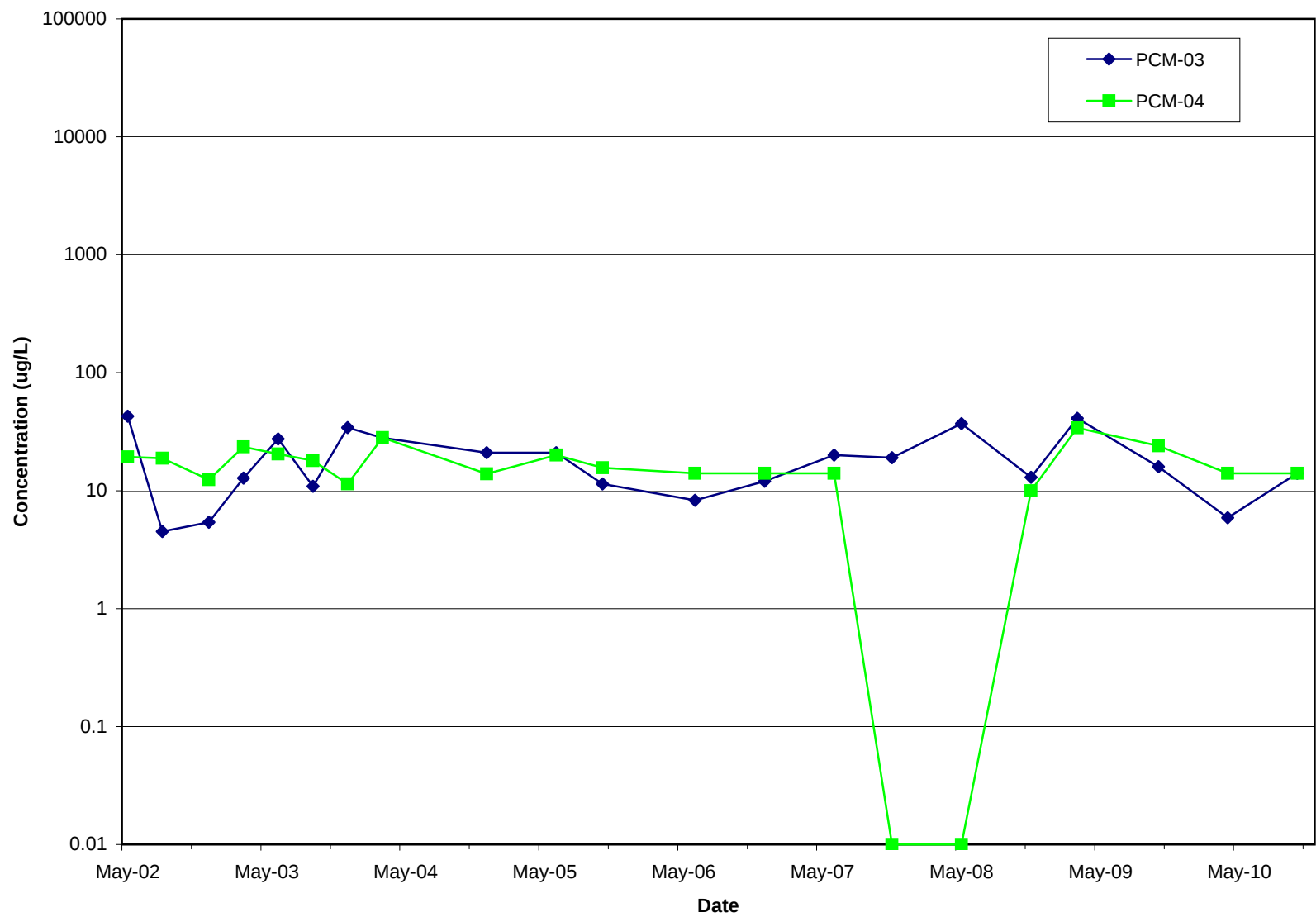


figure 4
CONCENTRATION OF 2-CHLOROPHENOL vs. TIME
102ND STREET LANDFILL



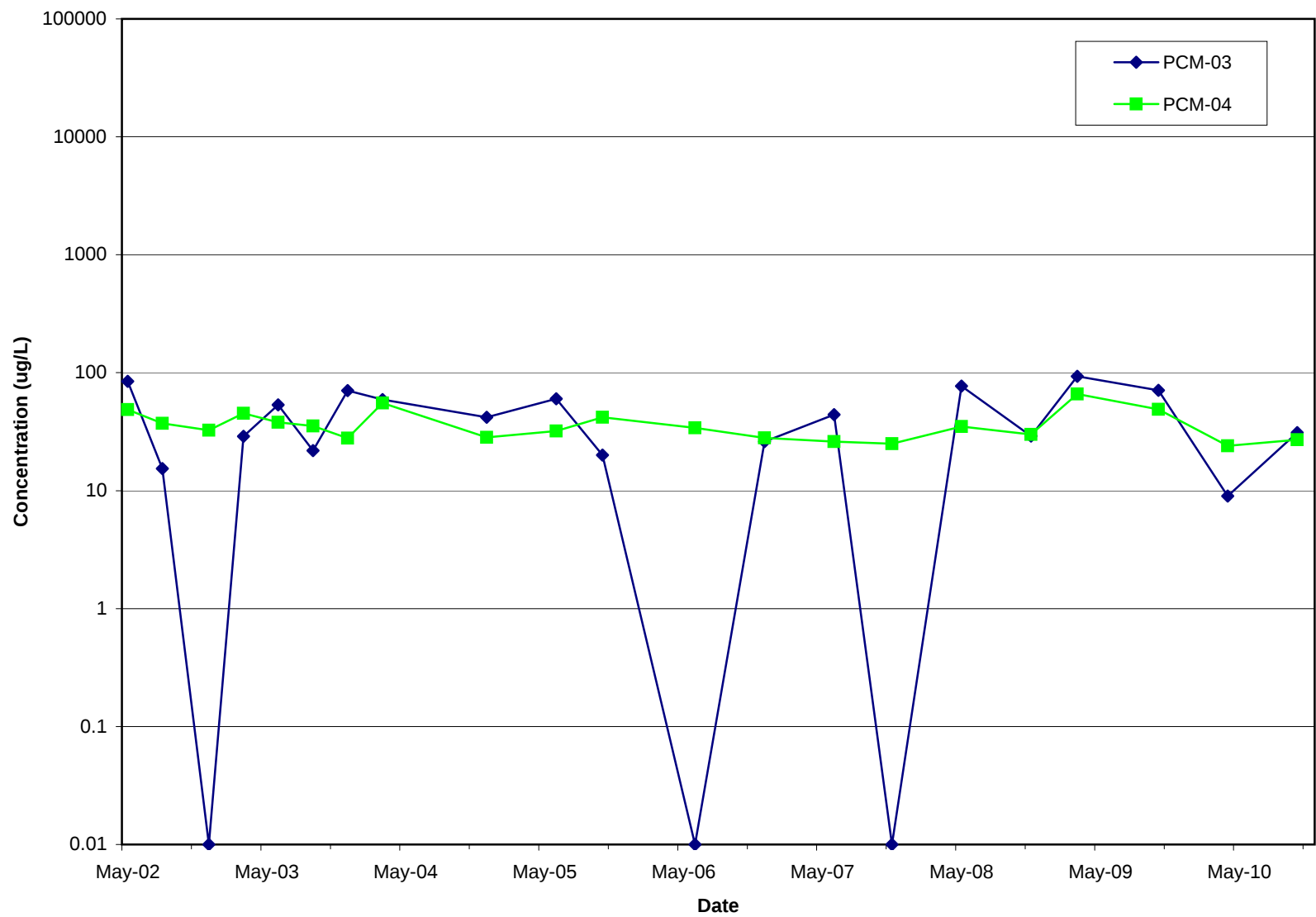


figure 5
CONCENTRATION OF 4-CHLOROPHENOL vs. TIME
102ND STREET LANDFILL



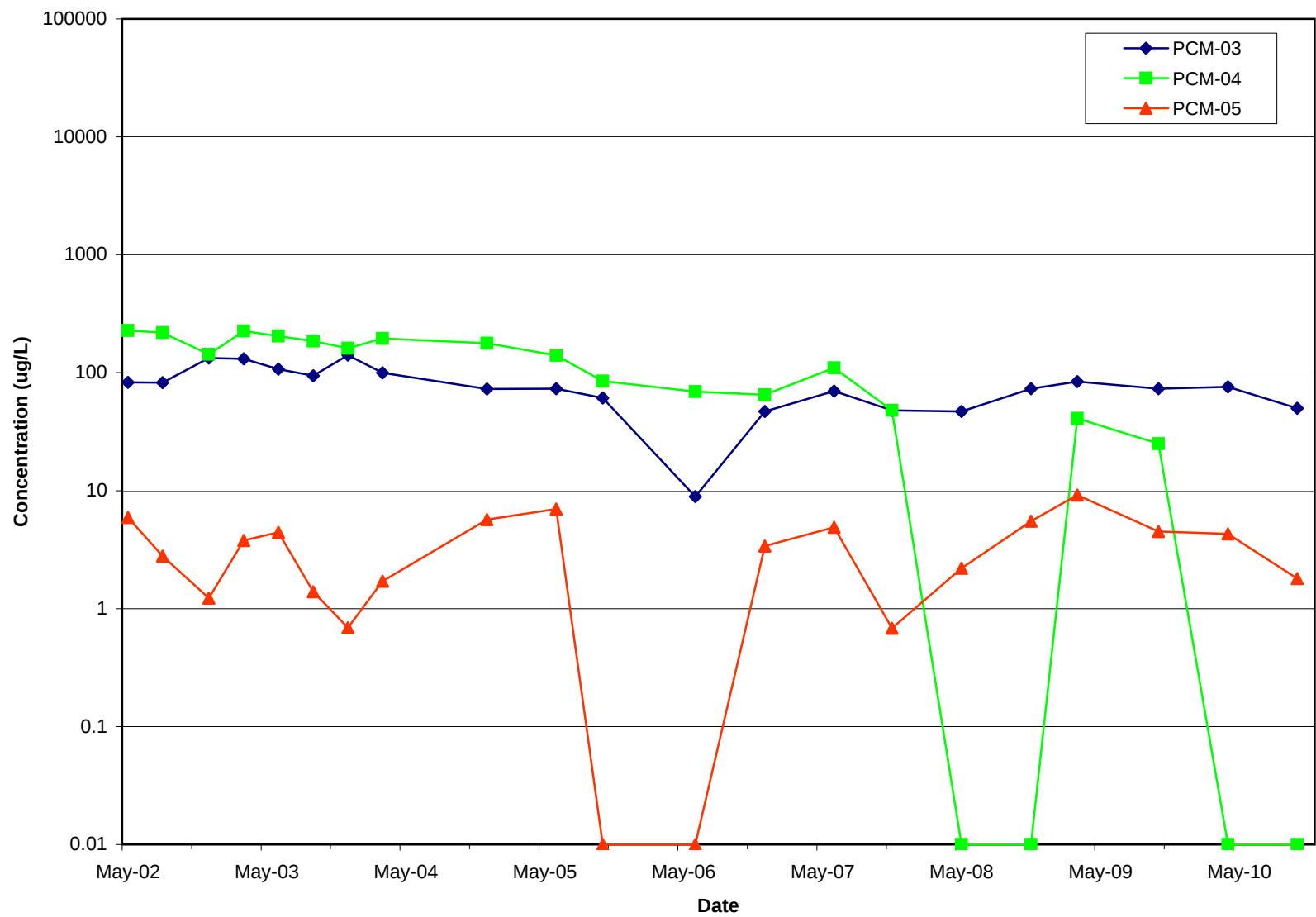


figure 6
CONCENTRATION OF BENZENE vs. TIME
102ND STREET LANDFILL



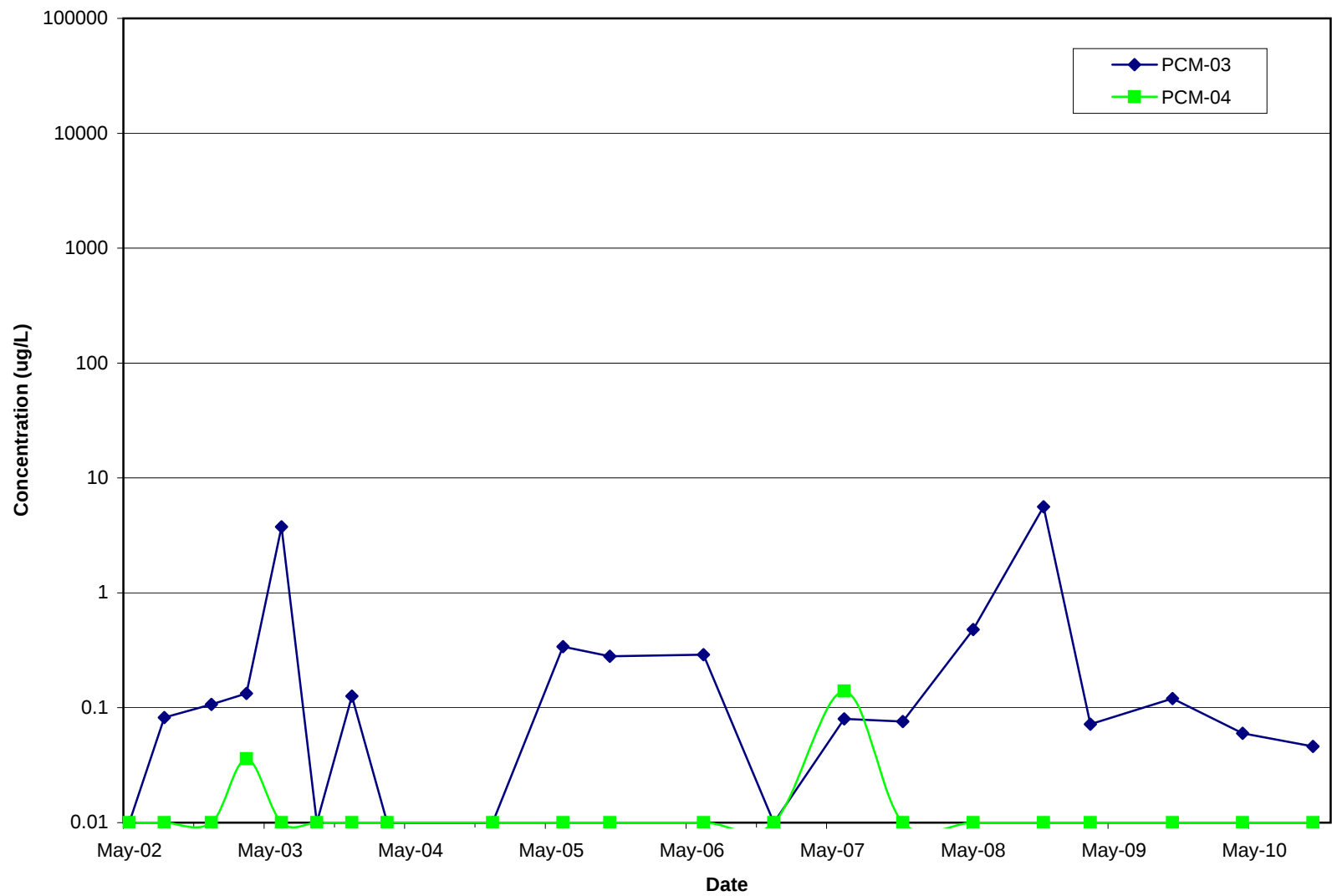


figure 7
CONCENTRATION OF BETA-BHC vs. TIME
102ND STREET LANDFILL



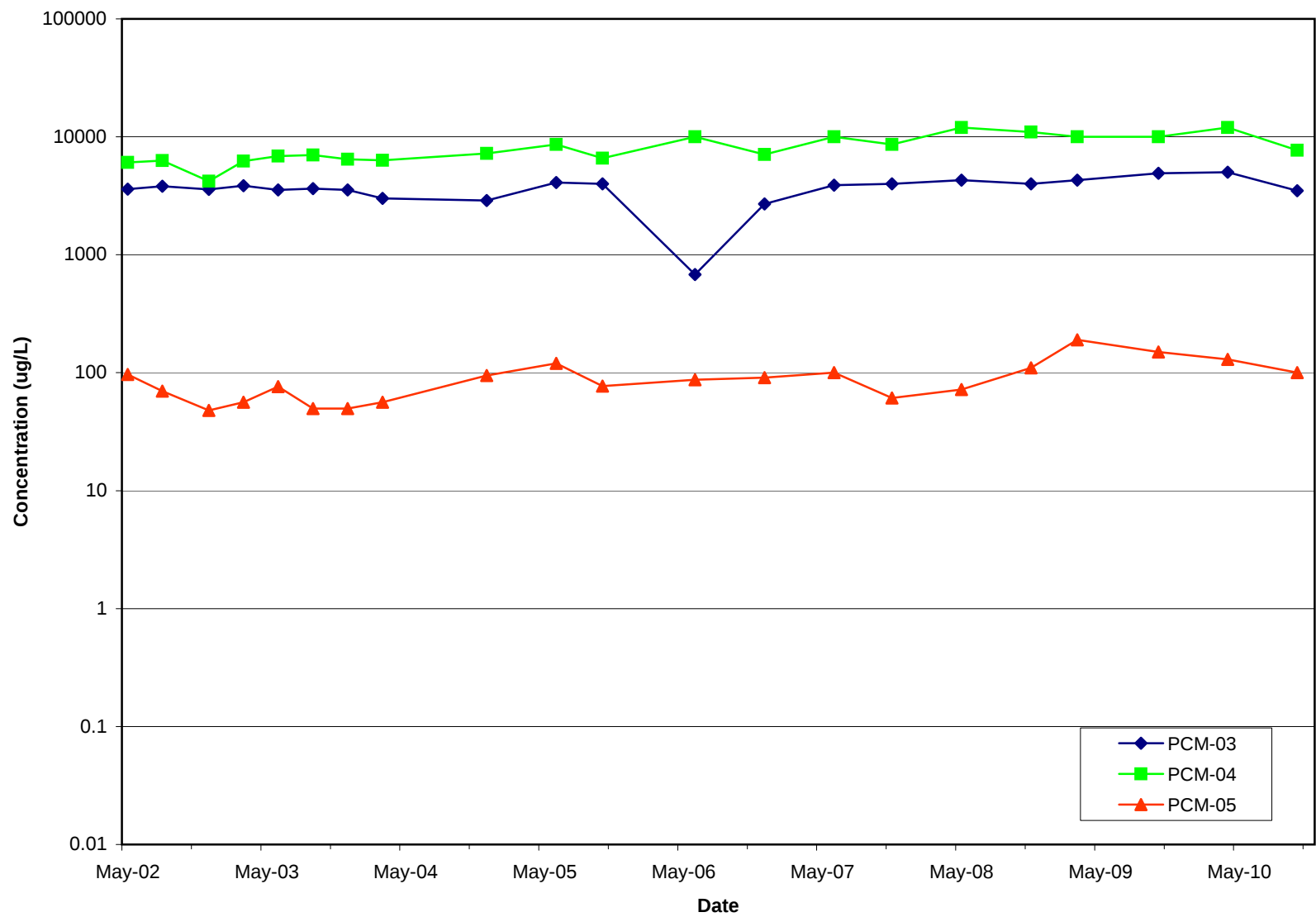


figure 8
CONCENTRATION OF CHLOROBENZENE vs. TIME
102ND STREET LANDFILL



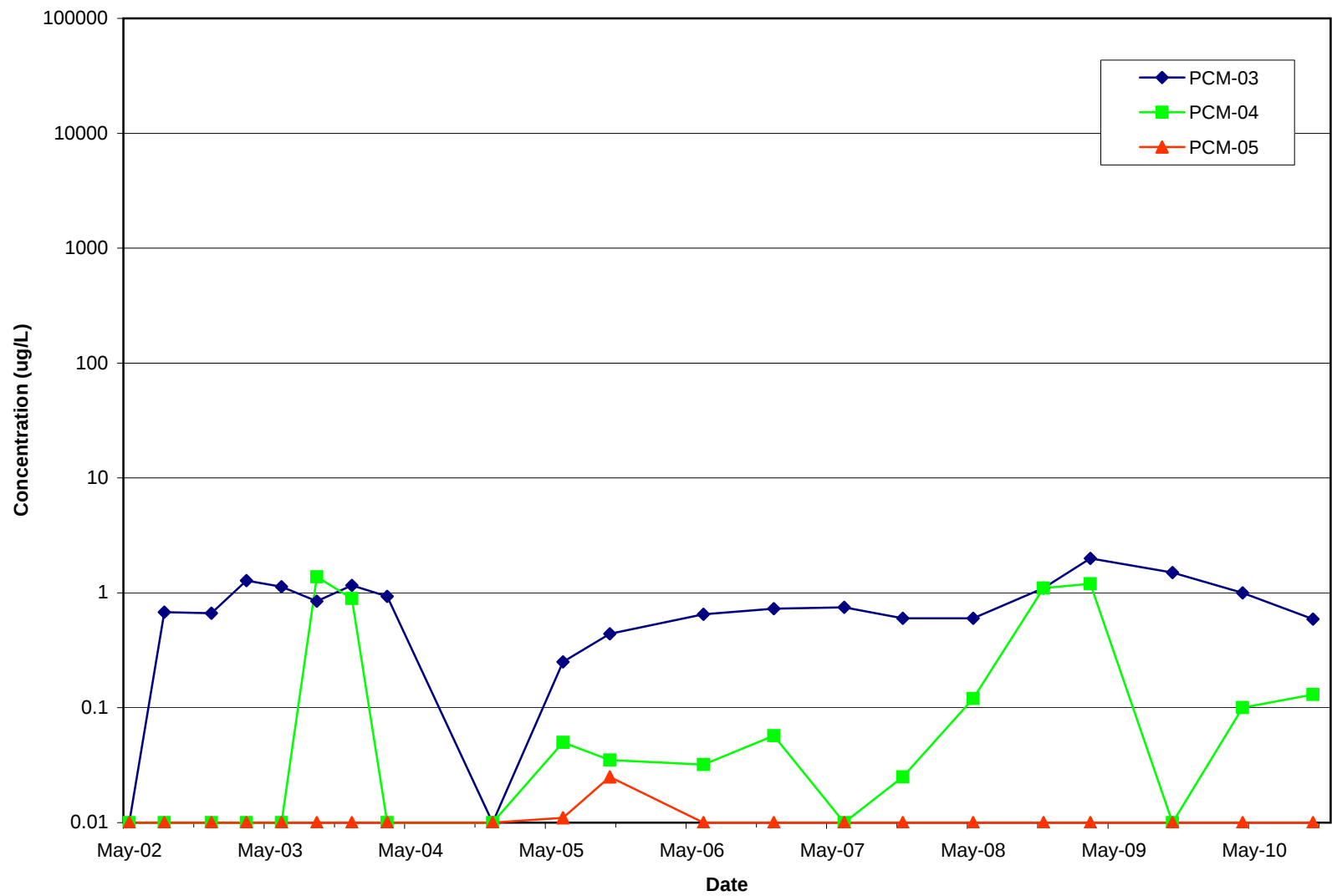


figure 9
CONCENTRATION OF DELTA-BHC vs. TIME
102ND STREET LANDFILL



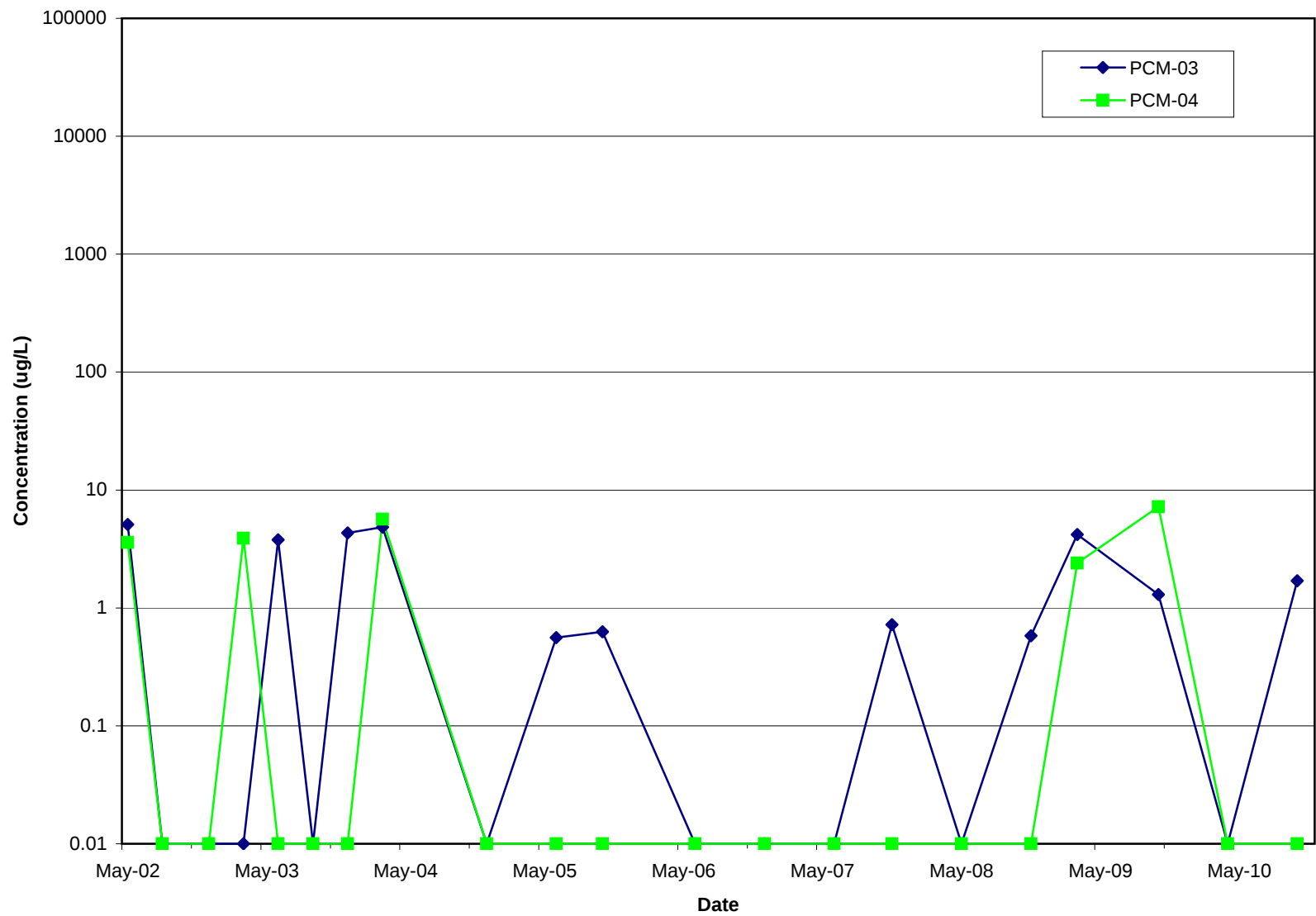


figure 10
CONCENTRATION OF PHENOL vs. TIME
102ND STREET LANDFILL

