



Glenn Springs Holdings, Inc.

A subsidiary of Occidental Petroleum

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May 27, 2011

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 - April 2011
102nd Street Landfill Site, Niagara Falls, New York

Pursuant to the requirements of the Consent Decree and the Operations and Maintenance (O&M) Manual, Glenn Springs Holdings, Inc. (GSH) 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 April 2011. 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 231-670-6809 should you have any questions or concerns.

Very truly yours,

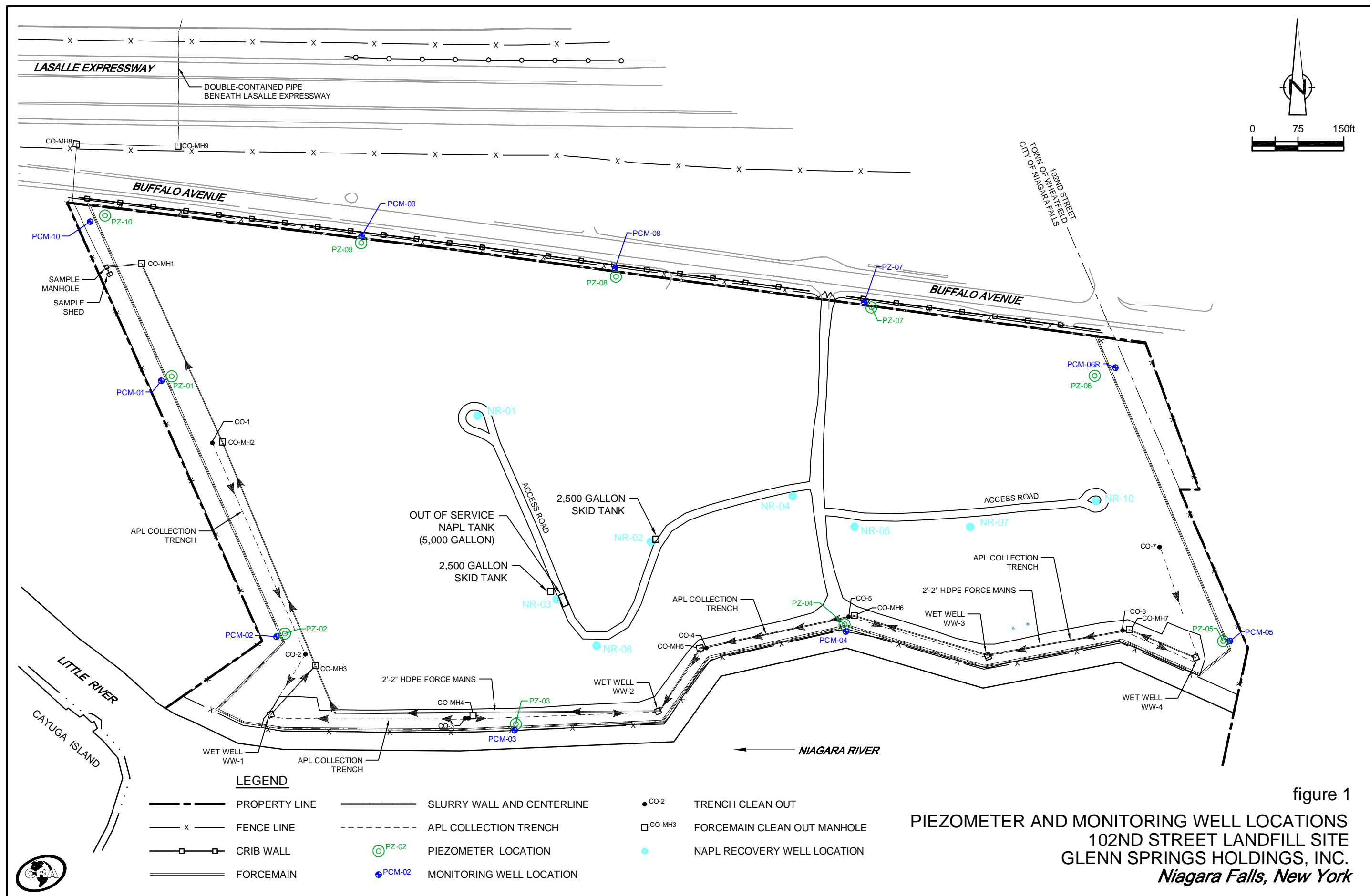
GLENN SPRINGS HOLDINGS, INC.

Joseph Branch
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231-670-6809

JB/EG/adh/10
Encl.

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**CONESTOGA-ROVERS
& ASSOCIATES**

E-Mail Date: May 13, 2011
E-Mail To: Mike Bellotti; Clint Babcock;
Dennis Hoyt; Jane Polovich;
Shawn McEvoy; Joseph Branch
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
APRIL 2011

PREPARED BY:
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TABLE OF CONTENTS

	<u>Page</u>
1.0 INTRODUCTION	1
2.0 QA/QC REVIEW	1
3.0 CONCLUSION	2

LIST OF TABLES (Following Text)

TABLE 1	SAMPLE COLLECTION AND ANALYSIS SUMMARY
TABLE 2	ANALYTICAL RESULTS SUMMARY
TABLE 3	ANALYTICAL METHOD SUMMARY
TABLE 4	QUALIFIED SAMPLE RESULTS DUE TO OUTLYING MATRIX SPIKE/ MATRIX SPIKE DUPLICATE RECOVERIES

LIST OF ATTACHMENTS

ATTACHMENT A	CHAIN OF CUSTODY DOCUMENTS
ATTACHMENT B	GRAPHICAL PRESENTATION CHEMICAL CONCENTRATION VERSUS TIME

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 April 2011 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 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.

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 method blank results 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. Low MSD recoveries and high RPDs were reported for two pesticides, and the associated sample results were qualified as estimated (see Table 4).

Laboratory Control Sample (LCS) Analyses

LCSs were analyzed for all parameters. All recoveries were acceptable, indicating good analytical accuracy.

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, indicating good laboratory and sampling protocol precision.

Trip Blanks

Three 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
APRIL 2011**

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-01-0411	PCBM-01	04/13/11	10:25	X	X	X	X	12.96	MS/MSD/Duplicate
PCBM-02-0411	PCBM-02	04/13/11	13:40	X	X	X	X	12.21	
PCM-03-0411	PCM-03	04/13/11	09:15	X	X	X	X	13.71	
PCM-04-0411	PCM-04	04/13/11	12:20	X	X	X	X	12.44	
PCM-05-0411	PCM-05	04/13/11	14:35	X	X	X	X	10.41	
102NDTRIP-041311	-	04/13/11	-		X			-	Trip Blank
PCBM-03-0411	PCBM-03	04/14/11	12:45	X	X	X	X	15.82	Duplicate of PCBM-03-0411
PCM-12-0411	PCBM-03	04/14/11	13:00	X	X	X	X	15.82	
PCM-01-0411	PCM-01	04/14/11	14:50	X	X	X	X	10.38	
PCM-07R-0411	PCM-07R	04/14/11	10:10	X	X	X	X	13.35	
PCM-08-0411	PCM-08	04/14/11	11:30	X	X	X	X	8.72	
PCM-09-0411	PCM-09	04/14/11	13:40	X	X	X	X	5.78	Trip Blank
102NDTRIP-041411	-	04/14/11	-		X			-	
PCM-02-0411	PCM-02	04/15/11	10:30	X	X	X	X	9.19	
PCM-10-0411	PCM-10	04/15/11	09:15	X	X	X	X	10.93	Trip Blank
102NDTRIP-041511	-	04/15/11	-		X			-	

Notes:

- ⁽¹⁾ Well PCM-06 was dry.
- ⁽²⁾ Niagara River water level for March 16, 2011 was 562.91 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
APRIL 2011

<i>Sample Location:</i>		<i>PCBM-01</i>	<i>PCBM-02</i>	<i>PCBM-03</i>	<i>PCBM-03</i>	<i>PCM-01</i>	<i>PCM-02</i>	<i>PCM-03</i>
<i>Sample ID:</i>		<i>PCBM-01-0411</i>	<i>PCBM-02-0411</i>	<i>PCBM-03-0411</i>	<i>PCM-12-0411</i>	<i>PCM-01-0411</i>	<i>PCM-02-0411</i>	<i>PCM-03-0411</i>
<i>Sample Date:</i>		<i>4/13/2011</i>	<i>4/13/2011</i>	<i>4/14/2011</i>	<i>4/14/2011</i> <i>(Duplicate)</i>	<i>4/14/2011</i>	<i>4/15/2011</i>	<i>4/13/2011</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	120 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	120 U
1,2-Dichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	61 J
1,4-Dichlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	310
2-Chlorotoluene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	120 U
Benzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	62 J
Chlorobenzene	µg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3400
<i>Semi-volatile Organic Compounds</i>								
1,2,4,5-Tetrachlorobenzene	µg/L	9.4 U	9.5 U	9.5 U	9.5 U	9.5 U	9.5 U	9.5 U
2,4,5-Trichlorophenol	µg/L	9.4 U	9.5 U	9.5 U	9.5 U	9.5 U	9.5 U	9.5 U
2,4-Dichlorophenol	µg/L	9.4 U	9.5 U	9.5 U	9.5 U	9.5 U	9.5 U	9.5 U
2,5-Dichlorophenol	µg/L	9.4 U	9.5 U	9.5 U	9.5 U	9.5 U	9.5 U	13
2-Chlorophenol	µg/L	9.4 U	9.5 U	9.5 U	9.5 U	9.5 U	9.5 U	9.0 J
4-Chlorophenol	µg/L	9.4 U	9.5 U	9.5 U	9.5 U	9.5 U	9.5 U	16
Phenol	µg/L	9.4 U	9.5 U	9.5 U	9.5 U	9.5 U	9.5 U	0.91 J
<i>Pesticides</i>								
alpha-BHC	µg/L	0.048 U	0.047 U	0.048 U	0.048 U	0.048 U	0.048 U	0.048 U
beta-BHC	µg/L	0.048 U	0.047 U	0.048 U	0.048 U	0.048 U	0.048 U	0.059
delta-BHC	µg/L	0.048 U	0.047 UJ	0.048 U	0.048 U	0.048 U	0.048 U	0.075
gamma-BHC (lindane)	µg/L	0.048 U	0.047 UJ	0.048 U	0.048 U	0.048 U	0.048 U	0.048 U
<i>Metals</i>								
Arsenic	µg/L	10.0 U	10.0 U	10.0 U	10.0 U	10.0 U	10.0 U	10.0 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
APRIL 2011

<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-04-0411</i>	<i>PCM-05-0411</i>	<i>PCM-07R-0411</i>	<i>PCM-08-0411</i>	<i>PCM-09-0411</i>	<i>PCM-10-0411</i>
<i>Sample Date:</i>		<i>4/13/2011</i>	<i>4/13/2011</i>	<i>4/14/2011</i>	<i>4/14/2011</i>	<i>4/14/2011</i>	<i>4/15/2011</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	220 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	2.4 J	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	µg/L	8400	87	0.18 J	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	9.6 U	9.5 U	9.5 U
2,4,5-Trichlorophenol	µg/L	9.5 U	9.5 U	9.6 U	9.6 U	9.5 U	9.5 U
2,4-Dichlorophenol	µg/L	0.90 J	9.5 U	9.6 U	9.6 U	9.5 U	9.5 U
2,5-Dichlorophenol	µg/L	9.5 U	9.5 U	9.6 U	9.6 U	9.5 U	9.5 U
2-Chlorophenol	µg/L	12	9.5 U	9.6 U	9.6 U	9.5 U	9.5 U
4-Chlorophenol	µg/L	28	1.7 J	9.6 U	9.6 U	9.5 U	9.5 U
Phenol	µg/L	9.5 U	9.5 U	9.6 U	9.6 U	9.5 U	9.5 U
<i>Pesticides</i>							
alpha-BHC	µg/L	0.048 U	0.048 U	0.033 J	0.048 U	0.048 U	0.047 U
beta-BHC	µg/L	0.048 U	0.048 U	0.048 U	0.048 U	0.048 U	0.047 U
delta-BHC	µg/L	0.13	0.048 U	0.032 J	0.048 U	0.048 U	0.047 U
gamma-BHC (lindane)	µg/L	0.048 U	0.048 U	0.048 U	0.048 U	0.048 U	0.047 U
<i>Metals</i>							
Arsenic	µg/L	10.0 U	10.0 U	10.0 U	10.0 U	10.0 U	10.0 U
Mercury	µg/L	0.11 J	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
APRIL 2011

<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 OUTLYING MATRIX SPIKE/MATRIX SPIKE DUPLICATE RECOVERIES
SEMI-ANNUAL GROUNDWATER SAMPLING
102ND STREET LANDFILL
NIAGARA FALLS, NEW YORK
APRIL 2011**

<i>Parameter</i>	<i>Sample ID</i>	<i>Analyte</i>	<i>MS Recovery (percent)</i>	<i>MSD Recovery (percent)</i>	<i>RPD (percent)</i>	<i>Control Limits</i>		<i>Sample Result</i>	<i>Units</i>	<i>Qualifier</i>
Pesticides	PCBM-02-0411	gamma-BHC	78	59	27	63-123	0-21	0.047 U	µg/L	UJ
		delta-BHC	37	20	57	30-137	0-26	0.047 U	µg/L	UJ

Notes:

J Estimated.
 U Non-detect at the associated value.
 MS Matrix Spike.
 MSD Matrix Spike Duplicate.
 RPD Relative Percent Difference.
 UJ Not detected, estimated reporting limit.

ATTACHMENT A

CHAIN OF CUSTODY DOCUMENTS

QUOTE # 85414

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: 63716-05-03

Lab Information	
Laboratory: TEST AMERICA PITTSBURGH	
Laboratory Location: 301 ALPHA DRIVE PITTSBURGH, PA 15238	
Laboratory Contact: DAVID DUNLAP	
Requested Due Date:	TAT: 10
QA/QC Requirements:	

Event Information	
SSOW Ref#:	
Sampler Name: <i>Shawn Hachner</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(HNO3)	BHC(none)	SVOCs(none)	VOCs(HCl)	Remarks
PCM-02-0411					WG	04/15/2011	10:30	1	2	2	3	
PCM-10-0411					WG	04/15/2011	09:15	1	2	2	3	
102NDTRIP-041511					WG Q	04/15/2011	00:00	-	-	-	2	
Total Bottles								2	4	4	8	Grand Total:16

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	1	<i>Shawn Hachner</i>	4/15/11	1220	<i>David Dunlap</i>	4/16/11	0900
AIRBILL#:							

QUOTE# 85414

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: 53718-05-03

Lab Information	
Laboratory: TEST AMERICA PITTSBURGH	
Laboratory Location: 301 ALPHA DRIVE PITTSBURGH, PA 15238	
Laboratory Contact: DAVID DUNLAP	
Requested Due Date:	TAT: 10
QA/QC Requirements:	

Project Information	
SSOW Ref#:	
Sampler Name:	<i>Shawn Gardner</i>

Sample Condition

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

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
	WG	04/14/2011	12:45	1	2	2	3	
	WG	04/14/2011	14:50	1	2	2	3	
	WG	04/14/2011	10:10	1	1	1	3	
	WG	04/14/2011	11:30	1	2	2	3	
	WG	04/14/2011	13:40	1	2	2	3	
	WG	04/14/2011	13:00	1	2	2	3	
	WG Q	04/14/2011	00:00	-	-	-	2	
Total Bottles				6	11	11	20	Grand Total:48

SHIPMENT METHOD	NO. OF COOLERS	RELINQUISHED BY:	DATE	TIME	RECIEVED BY:	DATE	TIME
FedEx	2	<i>Shawn Gardner</i>	4/14/11	1635	<i>Shawn Gardner</i>	4/15/11	0915
AIRBILL#:							

QUOTE#85414

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 PITTSBURGH	
Laboratory Location: 301 ALPHA DRIVE PITTSBURGH, PA 15238	
Laboratory Contact: DAVID DUNLAP	
Requested Due Date:	TAT: 10
QA/QC Requirements:	

Expert Information	
SSOW Ref#:	
Sampler Name:	<i>Shawn Gardner</i>

Sample Identification	Valid Matrix Code		Matrix Code	Date Collected	Time Collected	As/MeC(HNO3)	BHC(none)	SVOCs(none)	VOCs(HC)	Remarks
	WG Groundwater	WB Borehole Water								
102NDTRIP-041311			WG	04/13/2011	00:00	0	0	0	2	
PCBM-01-0411			WG	04/13/2011	10:25	1	2	2	3	
PCBM-02-0411			WG	04/13/2011	13:40	3	6	6	9	MS/MSD
PCM-03-0411			WG	04/13/2011	09:15	1	2	2	3	
PCM-04-0411			WG	04/13/2011	12:20	1	2	2	3	
PCM-05-0411			WG	04/13/2011	14:35	1	2	2	3	
Total Bottles						7	14	14	23	Grand Total:68

Sample Condition

Temp in C	3.8
Received on ice	<input checked="" type="checkbox"/> YN
Sealed Cooler	<input checked="" type="checkbox"/> YN
Samples Intact	<input checked="" type="checkbox"/> YN

3.54.7

SHIPMENT METHOD	NO. OF COOLERS	RELINQUISHED BY:	DATE	TIME	RECIEVED BY:	DATE	TIME
FedEx	3	<i>Shawn Gardner</i>	4/13/11	1700	<i>TA R.H.</i>	4/14/11	0900
AIRBILL#:							

ATTACHMENT B

GRAPHICAL PRESENTATION
CHEMICAL CONCENTRATION VERSUS TIME

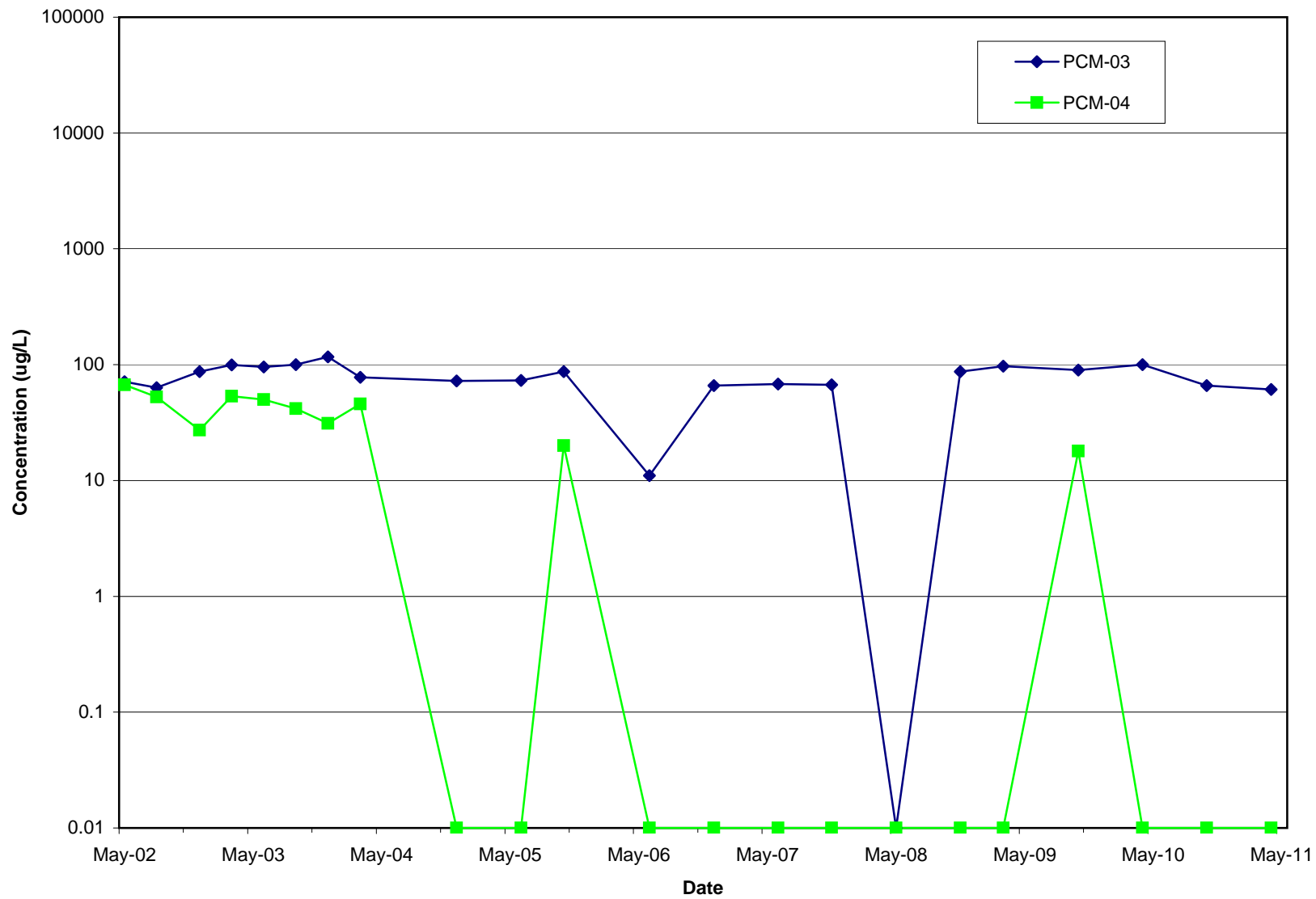


figure 1
CONCENTRATION OF 1,2-DICHLOROBENZENE vs. TIME
102ND STREET LANDFILL



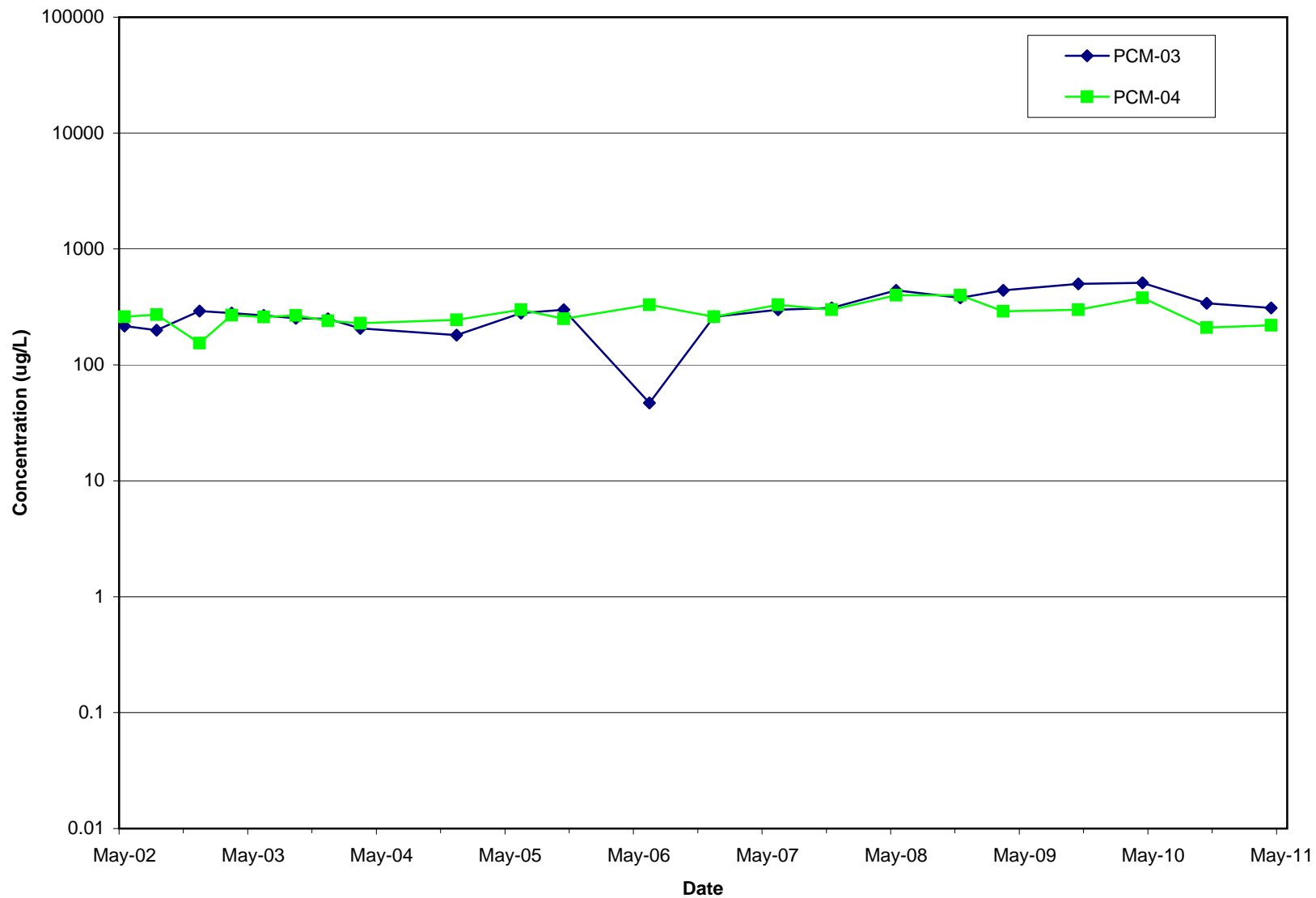


figure 2
CONCENTRATION OF 1,4-DICHLOROBENZENE vs. TIME
102ND STREET LANDFILL



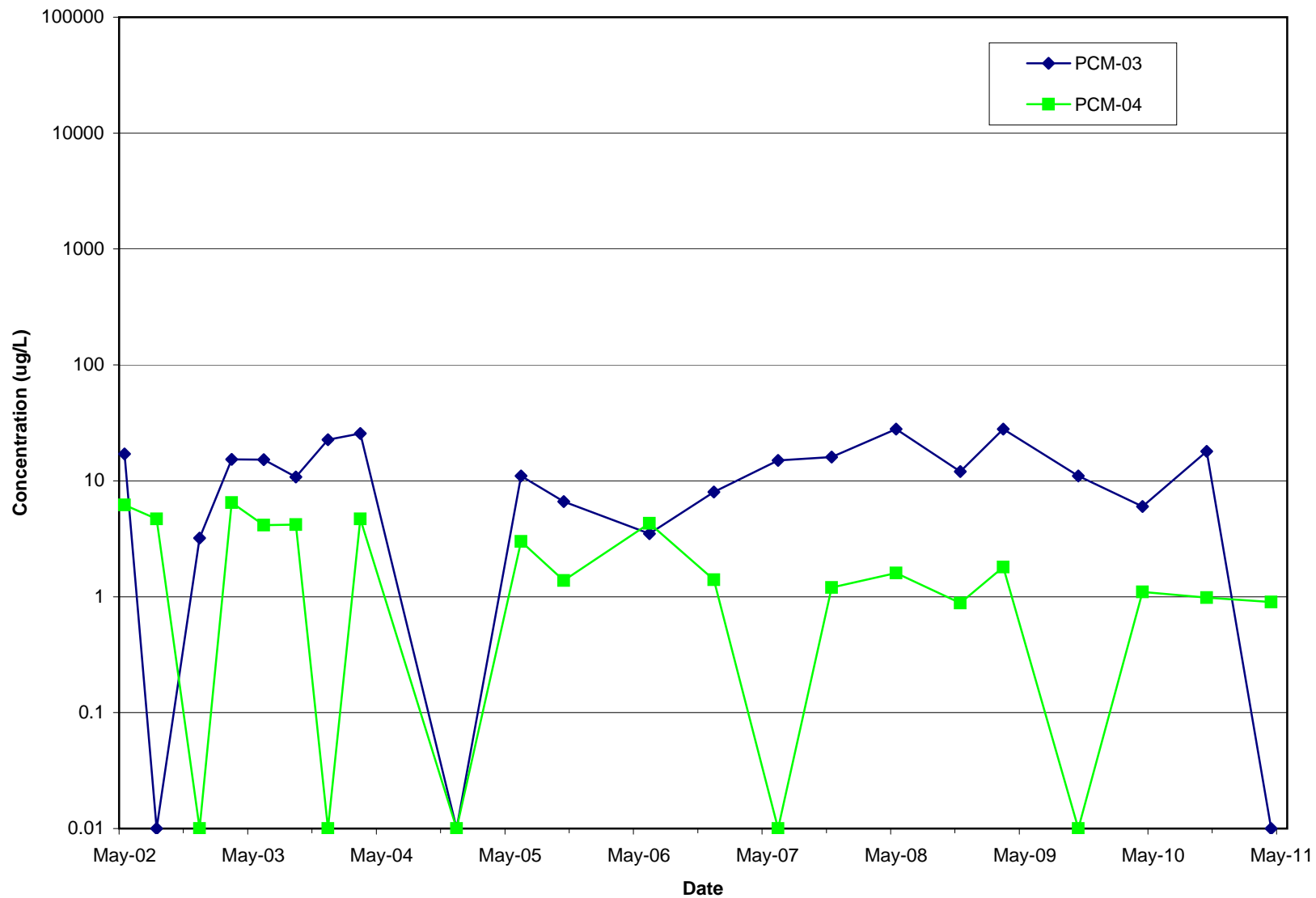


figure 3
CONCENTRATION OF 2,4-DICHLOROPHENOL vs. TIME
102ND STREET LANDFILL



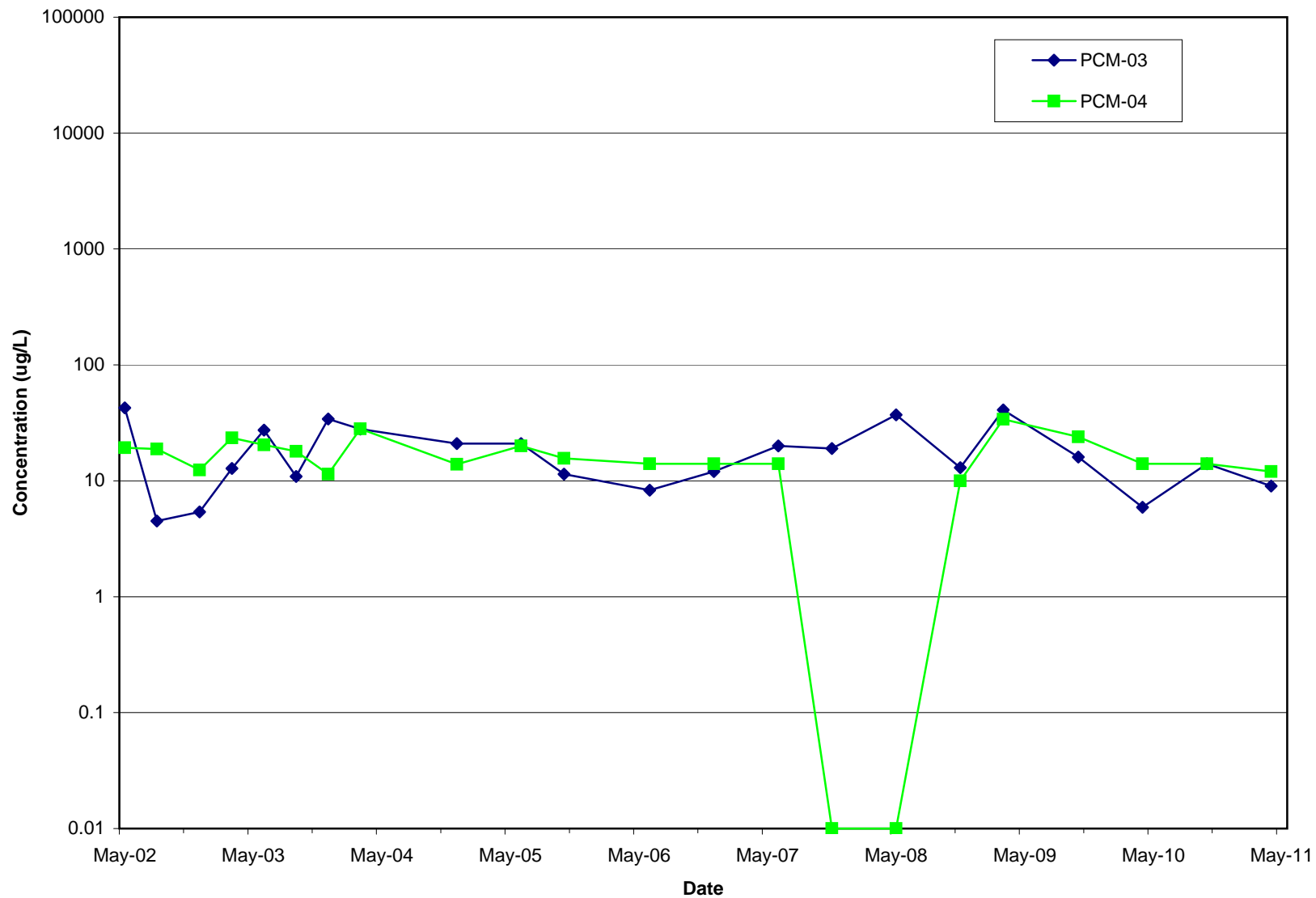


figure 4
CONCENTRATION OF 2-CHLOROPHENOL vs. TIME
102ND STREET LANDFILL



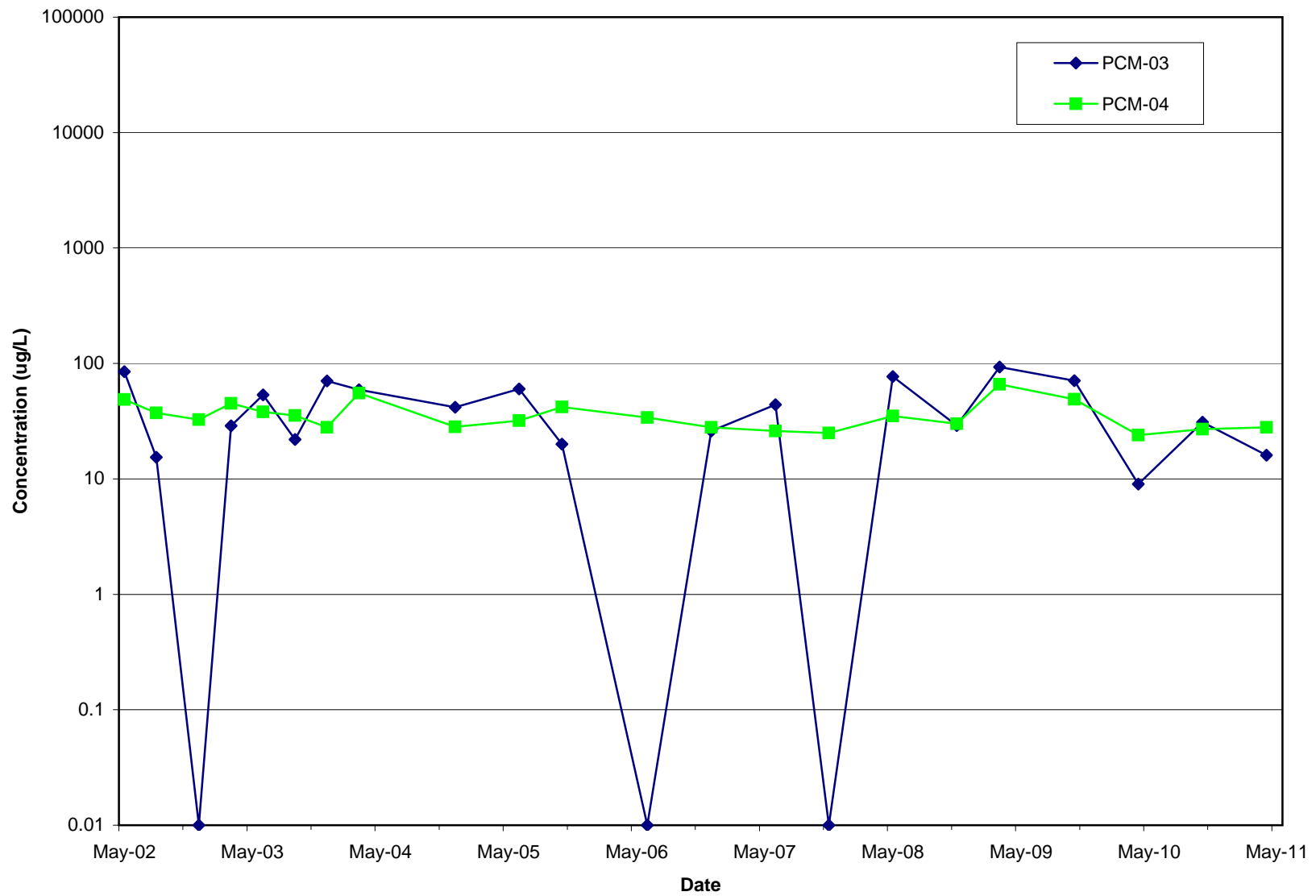


figure 5
CONCENTRATION OF 4-CHLOROPHENOL vs. TIME
102ND STREET LANDFILL



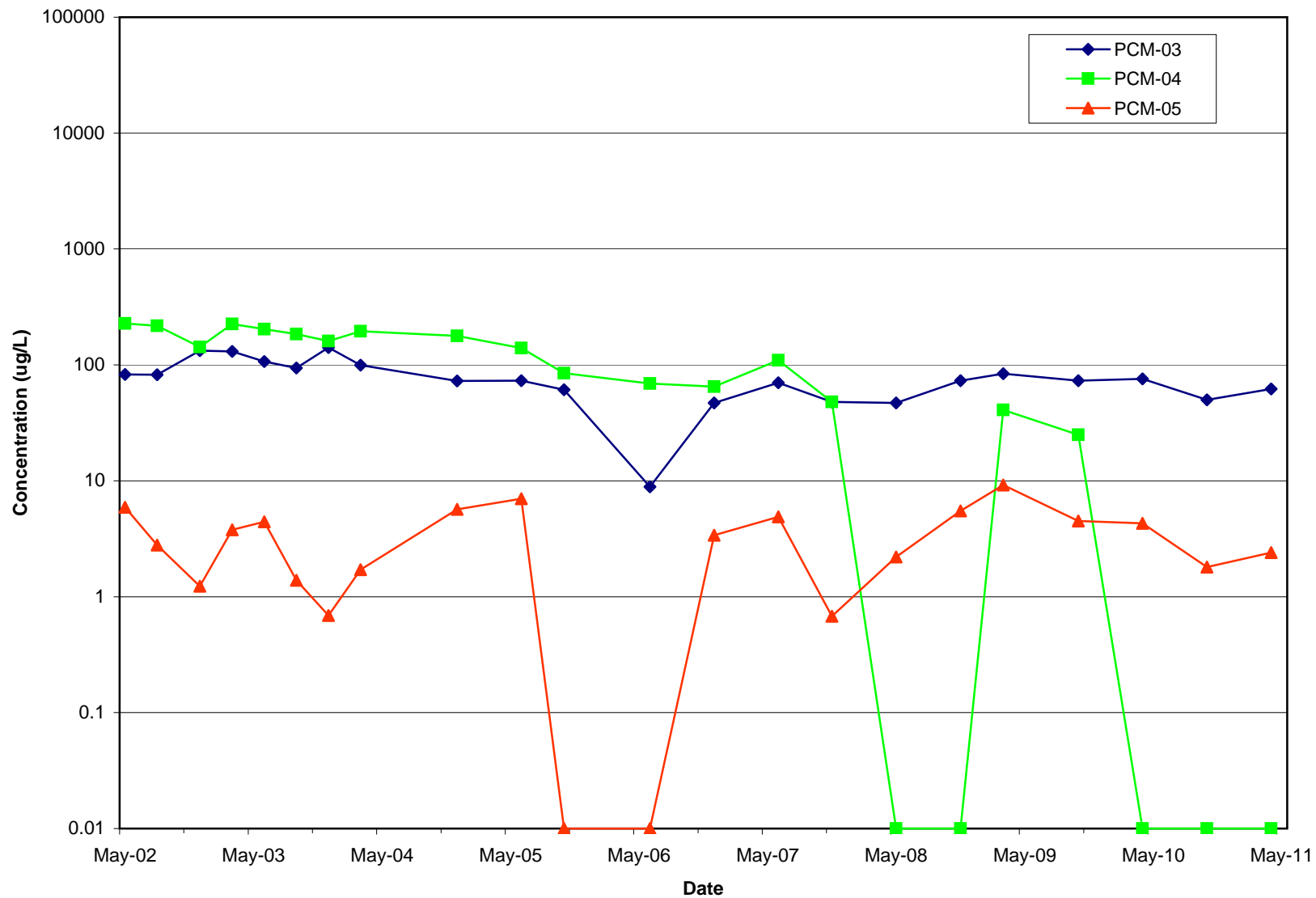


figure 6
CONCENTRATION OF BENZENE vs. TIME
102ND STREET LANDFILL



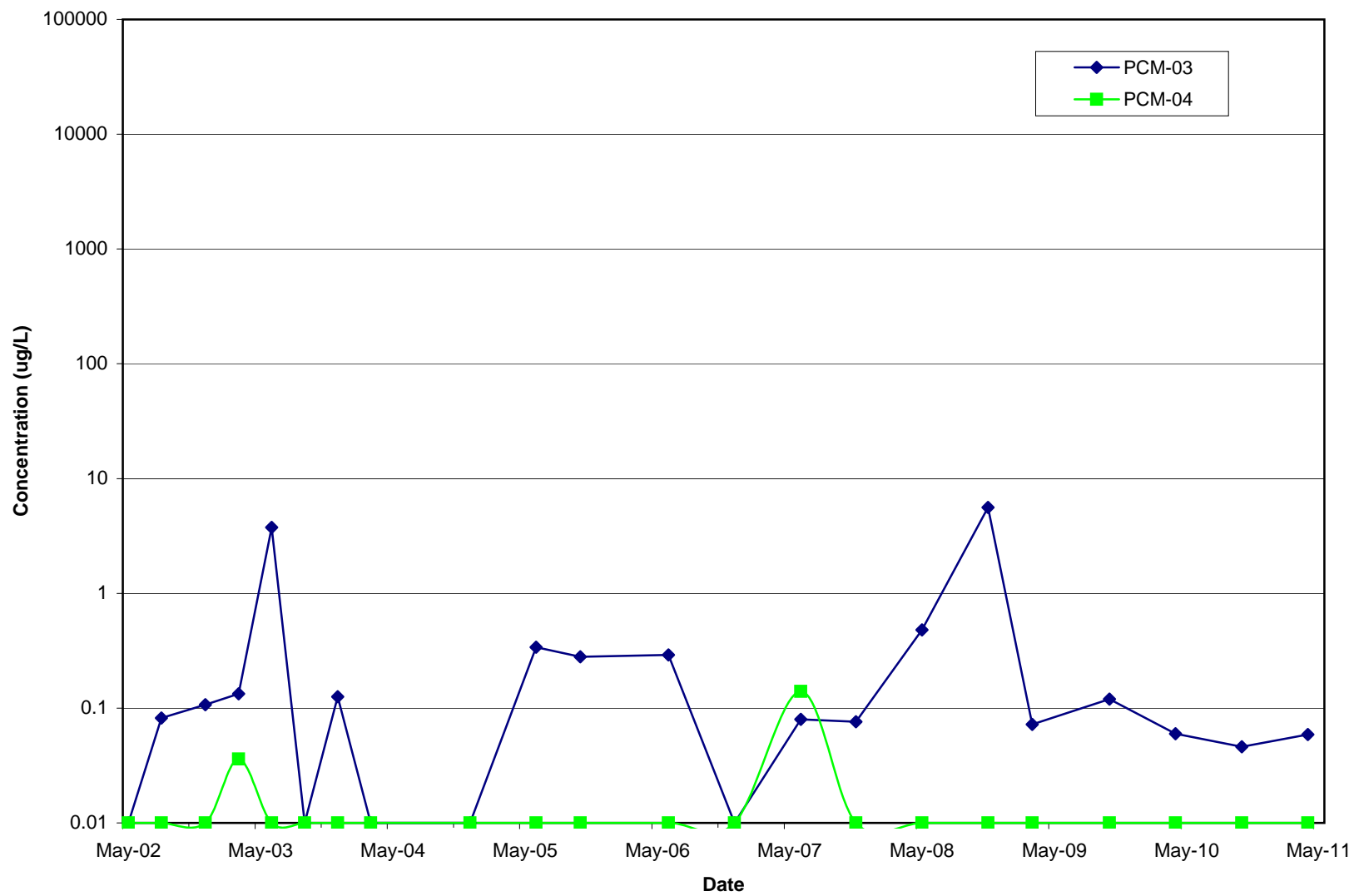


figure 7
CONCENTRATION OF BETA-BHC vs. TIME
102ND STREET LANDFILL

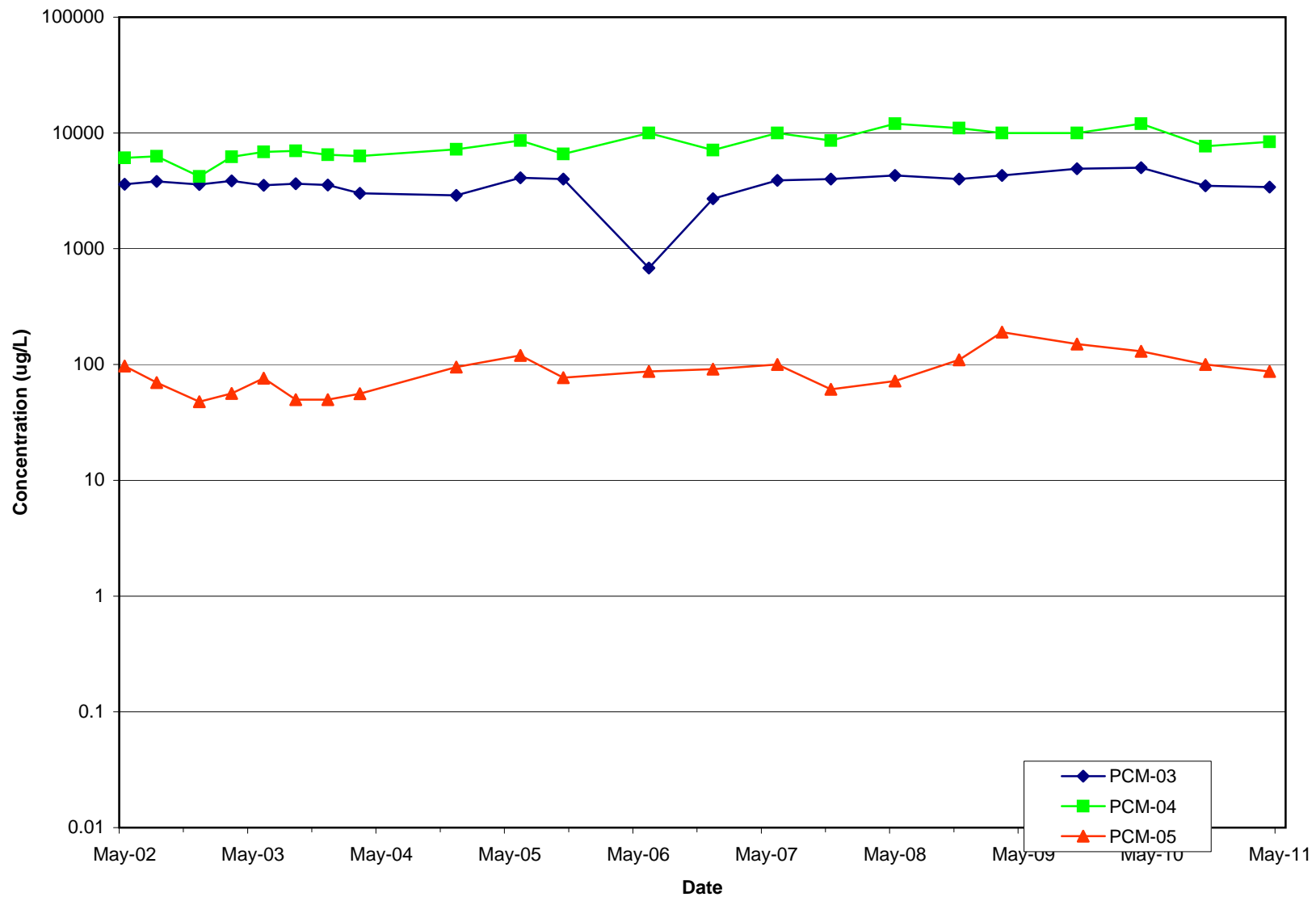


figure 8
CONCENTRATION OF CHLOROBENZENE vs. TIME
102ND STREET LANDFILL



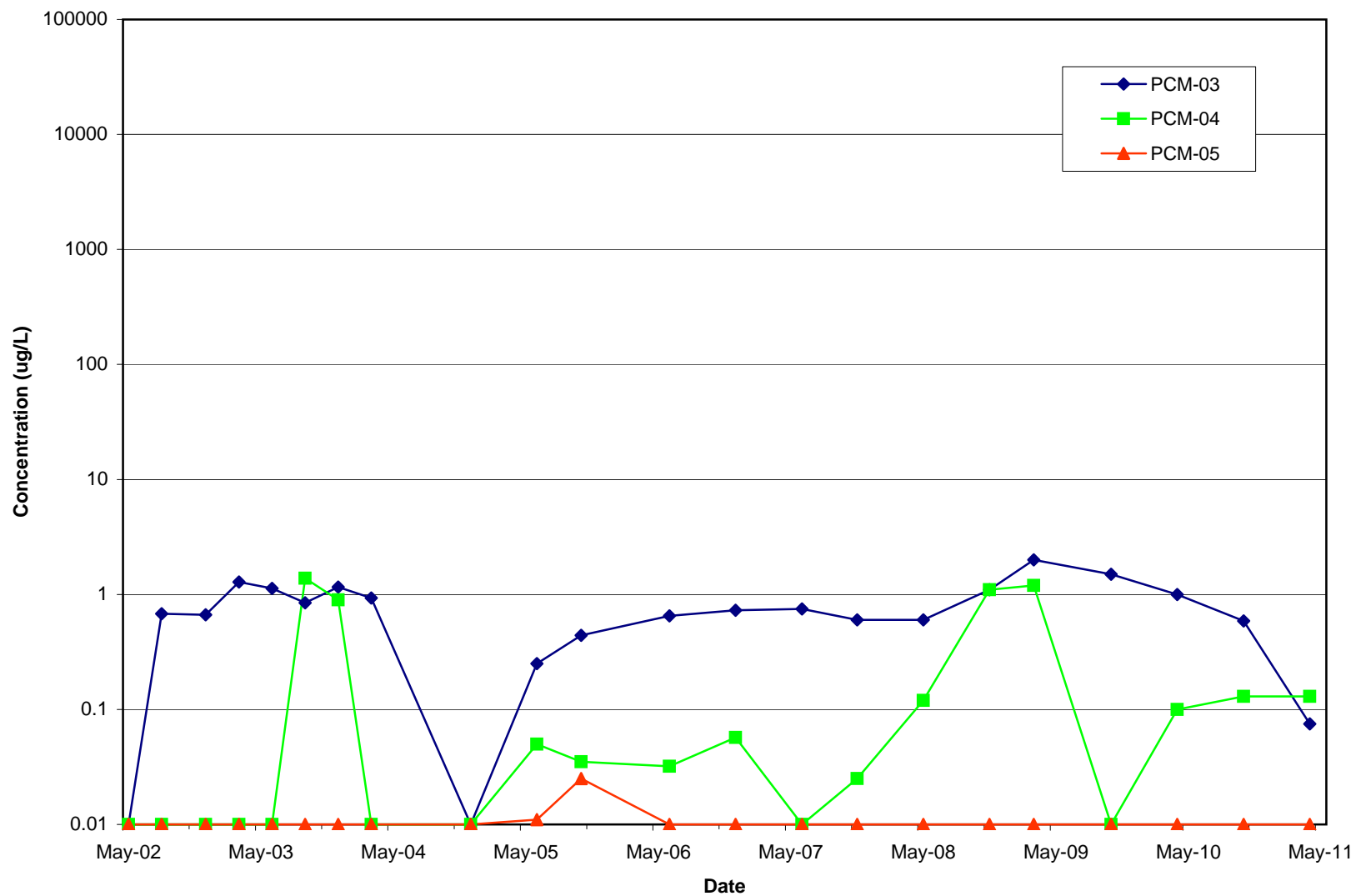


figure 9
CONCENTRATION OF DELTA-BHC vs. TIME
102ND STREET LANDFILL



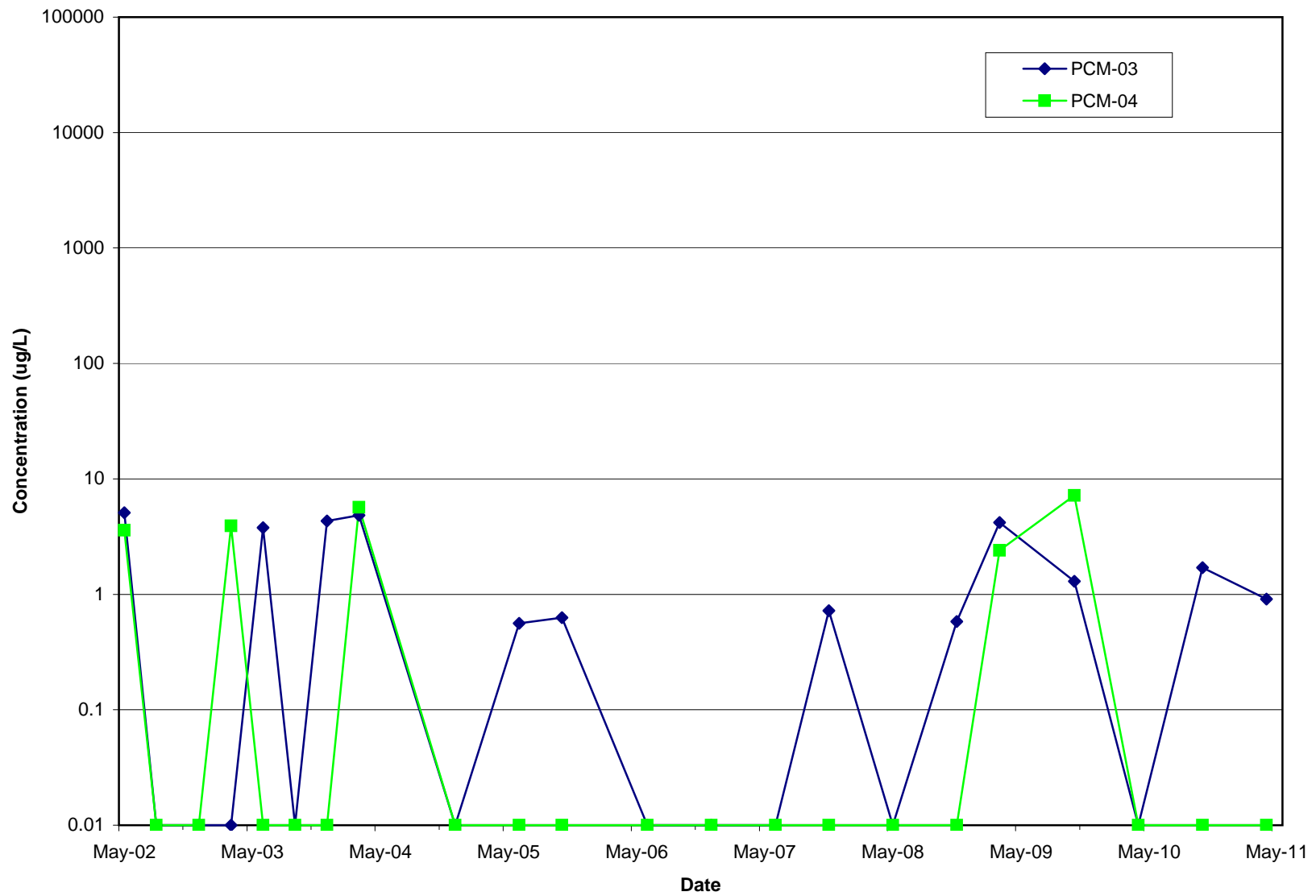


figure 10
CONCENTRATION OF PHENOL vs. TIME
102ND STREET LANDFILL

