Charles Gibson Site Site No. 932063 Periodic Review Report Revision

May 10, 2022

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I. INTRODUCTION

Brief Summary, Nature and Extent, Remedial History:

Construction of the remedy on the Charles Gibson Site concluded in 1990. The remedy consisted of rerouting Cayuga Creek around and away from the waste, installation of a fully circumscribed soil-bentonite slurry wall barrier and installation of a double flexible membrane liner cap with a perimeter collection drain system. The first year of operations and maintenance (O&M) of the containment remedy for the site and the groundwater monitoring program began in 1993. Waters collected in the site perimeter collection drain system are managed by direct discharge to the City of Niagara Falls Wastewater Treatment Facility. The Charles Gibson site is classified as a commercial/small industrial/residential user (CSIRU) and does not require a permit.

Effectiveness of Remedial Program:

Groundwater monitoring indicates there are no increased concentrations of compounds being monitored. Evaluation of the monitor well and sediment analytical results indicate the containment remedy is effective. An evaluation of data from the piezometer pairs at the Site indicates that a materially inward hydraulic gradient has been established in the containment area of the site. The remedial program is achieving the objectives of containing groundwater flow and maintaining groundwater quality standards.

Compliance:

There are no areas of non-compliance.

Recommendations:

No recommendations. Conditions at the Site are stable.

II. SITE OVERVIEW

<u>Site Description and Nature/Extent Prior to Remediation</u>:

The Site as now defined incorporates approximately two acres bounded to the east and north by Cayuga Creek, to the west by Tuscarora Road and to the south by Niagara Mohawk Power Corporation right-of-way and the Auto Zone Incorporated auto parts store and parking lot. The Site cap is slightly mounded with the center of the capped area essentially flat. The capped area is enclosed by a chain link fence. A wooden privacy fence is immediately next to and outside of the chain link fence on portions of the perimeter.

Remediation Chronology:

The Agreement includes a provision in the event that after seven years following the delivery of a Release of Liability (issued December 15, 1992), Olin demonstrates that conditions at the Site are such that the stated frequency or duration of the requirements are no longer necessary to determine whether the remediation is effective, Olin may reduce the frequency and duration of such monitoring or inspections. Olin has submitted annual reports and has conducted the required monitoring for the duration of the remediation.

III. REMEDY PERFORMANCE, EFFECTIVENESS, AND PROTECTIVENESS

The work performed for the Site during 2021 was reviewed and found to be in accordance with the approved O&M Manual (Revised 2019), the Site Management Plan approved by NYSDEC on July 17, 2020, as well as the NYSDEC approved reduction in annual sampling dated April 25, 2013. Groundwater monitoring indicates there are no increased concentrations of the Site compounds being monitored. Evaluation of the groundwater data generated during the 2021 monitoring year indicates that the containment remedy is effective. Drawdown in both manholes was effectively maintained.

IV. IC/EC PLAN

IC/EC Requirements:

Fence is in place around the landfill, effectively restricting access

Clean soil cover is in place on the landfill, restricting infiltration and promoting runoff

A hydraulic control system is in place, effectively controlling groundwater flow direction

Certification:

Attachment A

V. MONITORING PLAN COMPLIANCE REPORT

Components of Monitoring Plan:

Operation, maintenance, and monitoring activities to be performed include:

- Performance of a groundwater monitoring program to monitor ground water quality at the site and to verify the inward hydraulic gradient within the capped area.
- The current groundwater level monitoring system for the Site consists of six piezometers (P-1 through P-6) and two manholes (A and B). Piezometers P-1, P-2 and Manhole A are located in the northeast section of the Site; P-3, P-4, and Manhole B are located in the southeast section; and P-5 and P-6 are located toward the southwest (see *Attachment B*).
- All piezometers are constructed of Schedule 80 PVC and are 2 inches in diameter. Each piezometer has been constructed with 5 feet of screen and was screened at the water table.
- The construction of the piezometer screens at the water table allows for continued monitoring of the water table elevation inside and outside of the containment area during periods of water level fluctuations. Piezometers P-1, P-3, and P-5 are located outside of the slurry wall that runs along the perimeter of the Site. Piezometers P-2, P-4, and P-6 are inside the slurry wall and paired opposite the three piezometers outside the slurry wall.
- Water level elevations are measured quarterly at the Site in Manholes A and B and piezometers P-1 through P-6. Water level elevations are measured by means of an acoustical sounder or electronic water level probe. The sounder or probe is lowered into the manhole or piezometer until it makes contact with the free water surface. The depth

from the top of the piezometer riser pipe or manhole rim to the water surface is measured to an accuracy of 0.01 ft. Depth to water measurements are converted into mean sea level elevations by referring to the surveyed elevation of the top of the piezometer riser pipe or manhole rim provided on the Groundwater Elevation Form. The depth to water measurements for Manholes A and B are checked to see that they are not greater than 14.07 feet and 17.07 feet, respectively to ensure that the automatic sump pump is functioning.

Summary and Comparison to Remedial Objectives:

The isolation of groundwater within the capped area has been established and is being maintained by current operation and maintenance activities. The groundwater monitoring and sampling is performed on an annual basis in rotating quarters to help assess seasonal variability with Groundwater Sampling Field Parameters presented in **Attachment C**.

Currently two locations, immediately upstream and downstream of the Site and the adjacent remediated portion of the Cayuga Creek bed, are sampled once per year, in the Fall or 'low water' period. Beginning with the October 2000 sample event, annual creek sediment samples have been analyzed for BHC isomers only. Sample collection and analysis of creek sediments are performed annually during the second half of the calendar year. The fall 2021 data appeared to be consistent with historical results. The downstream sediment trap had been disturbed and there was no sample taken from the trap. The fall 2021 data showed no detections in the upstream location (Table 3).

The water elevation data collected from the piezometers and groundwater wells was used to determine whether an inward hydraulic gradient exists. Gradient direction was made by comparing water level measurements within the capped area to those measured outside the capped area. The groundwater elevation data indicates that groundwater within the capped area is consistent with historical data. An evaluation of data from the piezometer pairs at the Site indicates that historically an inward gradient exists during the spring and summer seasons while the fall/winter seasons exhibit conditions that reflect outward gradients. An evaluation of the seasonal trends from 2008 through 2021 shows that the spring elevations have remained consistent with all piezometers (Table 6). The fall data has shown roughly a 3 foot drop among the wells outside the slurry wall while elevations within the slurry wall has remained consistent. This is further evidence that the remedy has remained effective.

Table 4 and Table 4B shows the most recent piezometric data and graphs.

Deficiencies:

None

Recommendations for Changes:

No recommendations. Conditions at the Site are stable.

VI. O&M PLAN COMPLIANCE REPORT

Components of the O&M Plan:

Site remediation requirements have been met by Olin through rerouting of Cayuga Creek around and away from the waste, by constructing a fully circumscribing soil-bentonite slurry wall barrier, and through installing a double flexible membrane liner cap as part of the final cover with a perimeter collection drain system. This O&M Plan safeguards that remedy and provides for monitoring of the Gibson Site in compliance with the Settlement Agreement.

Quarterly inspections of the Gibson Site are conducted to identify any potential problems with physical deterioration of structures, possible malfunctions of the slurry wall or of the perforated CPVC drain system, and to ensure that all site remedial measures components are operating effectively, in accordance with the Settlement Agreement.

The Environmental Inspector conducts the inspections to ensure that the remedial measures at the Site will remain operative. Additionally, the inspections address the safeguards to control, minimize or eliminate threats to human health and the environment. Operation, maintenance, and monitoring activities are conducted to identify proposed changes to the O&M Manual or site procedures which would provide a safer and/or more efficient and cost-effective operation.

Recordkeeping is conducted for each site visit and inspection.

Operation & Monitoring (O&M) Summary:

The groundwater collection system is inspected for the buildup of hard or soft scale-like deposits. The inspection is performed concurrently with inspection of the capped area. If a component of the groundwater collection system is found to be damaged or malfunctioning, it is repaired or replaced.

The capped area is mowed on a regular basis to prevent establishment of woody vegetation during this reporting period. The capped area functions as designed and complies with the O&M Plan.

Inspections are conducted using the items listed on the Site Inspection Form presented in **Attachment D**. Information to be entered on these forms includes the inspector's name, date, and time of inspection, item inspected and any comments. The inspector indicates on the forms whether the condition of each item was acceptable or unacceptable to ensure that the requirements of this O&M Plan are fulfilled. The scheduled Site monitoring inspections are performed by a qualified individual assigned to inspect the items and systems noted on the Site Inspection Form. The completed Site Inspection Forms are maintained at Olin Environmental Remediation offices in Cleveland, TN. Inspections are performed, at a minimum, on a quarterly basis.

Evaluation of Remedial Systems:

All components are performing as designed.

O&M deficiencies:

None

Conclusions:

The O&M system is being run and maintained properly and does not require additions or modifications at this time.

VII. OVERALL PRR CONCLUSIONS AND RECOMMENDATIONS

Compliance with SMP:

Based on the operations and maintenance documentation listed above, the system requirements are being met. There are no new exposure pathways. Additional plans and modifications are not necessary.

Remedy Effectiveness:

The groundwater elevation data indicates that groundwater within the capped area is consistent with historical data and is being maintained by current operation and maintenance activities.

Review of the groundwater elevation data indicate that inward hydraulic gradients were observed between piezometers within the capped area and piezometers outside of the capped area with previously noted exceptions. Fluctuations of groundwater elevations indicate that minor outward hydraulic gradients historically occur, but typically revert back to inward gradients by the next quarter.

Currently two locations, immediately upstream and downstream of the Site and the adjacent remediated portion of the Cayuga Creek bed, are sampled once per year, in the Fall or 'low water' period. A sample is collected downstream of the Site to monitor changes in levels of contaminants in creek sediments, if any. The other sample, immediately upstream of the Site is used to monitor potential upstream contaminant sources or potential 'backwash' effects caused by the changing level of the Niagara River. Historically, upstream samples show higher concentrations than downstream. Beginning with the October 2000 sample event, annual creek sediment samples have been analyzed for BHC isomers only. Downstream sample collection amounts were insufficient for analysis and the upstream analysis revealed undetected concentrations of BHC.

Based on the data developed to date, the remedy has been effective in attaining the remedial objectives.

Future Submittals:

Future submittals of this report will continue to be submitted annually.

<u>Attachment A</u>

Institutional & Engineering Certification Form



Enclosure 2 NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION Site Management Periodic Review Report Notice



Site Management Periodic Review Report Notice Institutional and Engineering Controls Certification Form

Sit	Site Details e No. 932063	Box 1									
Sit	e Name Charles Gibson Site										
Cit Co	Site Address: N.E. Cnr. of Niagara Falls Blvd. & Tuscarora Rd. City/Town: Niagara Falls County: Niagara Site Acreage: 2.000										
Re	porting Period: January 31, 2021 to January 31, 2022										
		YES	NO								
1.	Is the information above correct?										
	If NO, include handwritten above or on a separate sheet.										
2.	Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?										
3.	Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?										
4.	Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		8								
	If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form										
5.	Is the site currently undergoing development?										
		Box 2									
		YES	NO								
6.	Is the current site use consistent with the use(s) listed below? Closed Landfill										
7.	Are all ICs in place and functioning as designed?										
	IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.	and									
Α (Corrective Measures Work Plan must be submitted along with this form to address t	hese iss	sues.								
 Sig	nature of Owner, Remedial Party or Designated Representative Date										

SITE NO. 932063 Box 3

Description of Institutional Controls

<u>Parcel</u>

Owner

Institutional Control

161.05-3-7

OLIN CORPORATION

Monitoring Plan O&M Plan

Consent Judgement 3/12/85 including IC stipulations p. 23 Permits and Easements, sections 11-24. Operation and Maintenance Manual; September 30, 2009.

- Groundwater Quality Monitoring.
- Leachate Monitoring.
- Creek Sediment Monitoring.

161.05-5-12

OLIN CORPORATION

Monitoring Plan O&M Plan

Consent Judgment 3/12/85 including IC stipulations p. 23 Permits and Easements, sections 11-24.

- Groundwater Quality Monitoring.
- Leachate Monitoring.
- Creek Sediment Monitoring.

Box 4

Description of Engineering Controls

Parcel

Engineering Control

161.05-3-7

Cover System

Groundwater Containment Leachate Collection Fencing/Access Control

- Realignment of Cayuga Creek from the waste.
- Fully circumscribed soil-bentonite slurry wall barrier.
- Double flexible membrane liner cap.
- Perimeter Leachate Collection System with discharge to NFWWTP.
- Final cover soil cap.
- Perimeter chain link and portions of wooden privacy fencing with locked gates.

161.05-5-12

Cover System

Groundwater Containment Leachate Collection Fencing/Access Control

- Realignment of Cayuga Creek away from the waste.
- Fully circumscribed soil-bentonite slurry barrier wall.
- Double flexible membrane liner cap.
- Perimeter leachate collection system with discharge to the NFWWTP.
- Final soil cover cap.
- Perimeter chain link with portions of wooden privacy fencing with locked gates.

	Periodic Review Report (PRR) Certification Statements
1.	I certify by checking "YES" below that:
	 a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the Engineering Control certification;
	 b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and compete.
	YES NO
2.	For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:
	(a) The Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;
	(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;
	(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;
	(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and
	(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.
	YES NO
	IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.
	A Corrective Measures Work Plan must be submitted along with this form to address these issues.
	Signature of Owner, Remedial Party or Designated Representative Date

IC CERTIFICATIONS SITE NO. 932063

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1,2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

at 490 Stuart Pd NE Charles TV 373D print name print business address

am certifying as Olin Corporation (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

Signature of Owner, Remedial Party, or Designated Representative Rendering Certification

EC CERTIFICATIONS

Box 7

Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

Carrie Hunt	at 490 Stuart R	oad NE, Clevela	nd TN 37312,									
print name	print name print business address											
am certifying as a Qualified Environmer	ntal Professional for th	essional for the Olin Corporation										
, 0		(Owner or Rer	nedial Party)									
Carrie LL CH	HMM, 11148		2/28/2022									
Signature of Qualified Environmental Pi	·	Stamp (Required for PF)	Date									

ATTACHMENTS

Attachment A – Institutional & Engineering Certification Form

Attachment B – Site Map

Attachment C – Field Sampling Forms

Attachment D – Site Inspection Forms

Table 1 – Analytical Summary - Groundwater

Table 2 - Analytical Summary - Manhole B

Table 3 – Analytical Summary - Sediments

Table 4 – Groundwater Evaluations Summary

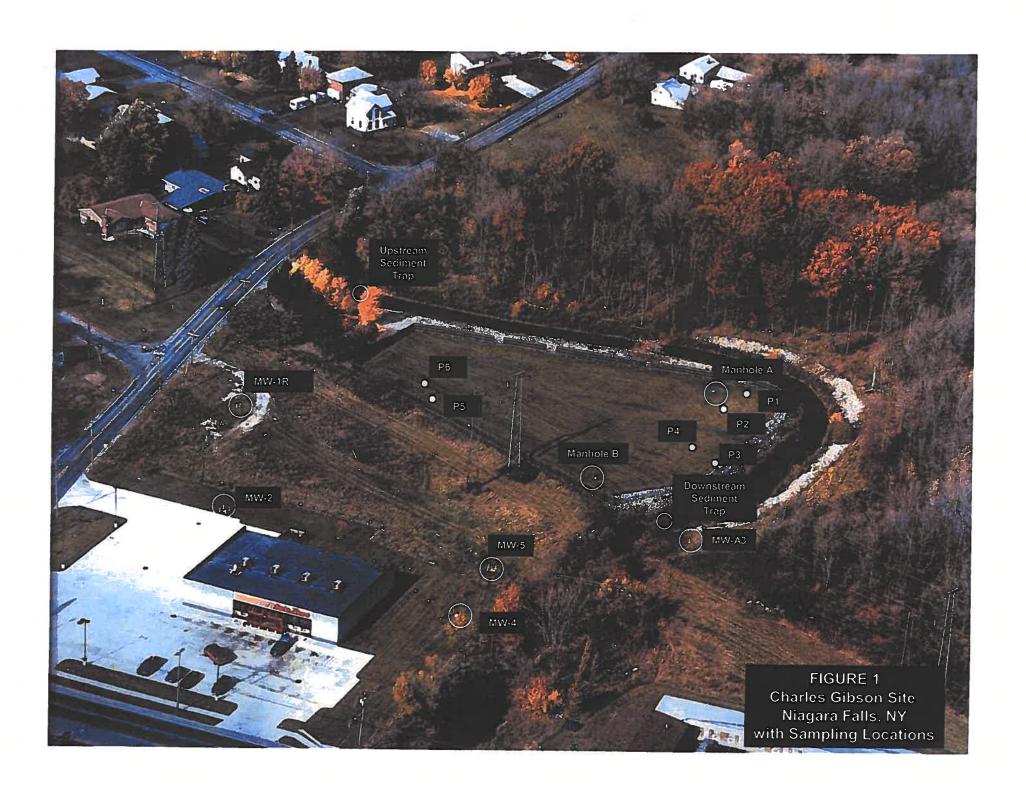
Table 4B – Groundwater Elevations Data

Table 5 – Discharge Volumes

Table 6 - Seasonal Piezometer Data

<u>Attachment B</u>

Site Features Map Figure 1



<u>Attachment C</u>

Field Sampling Forms

CHARLES GIBSON SITE NIAGARA FALLS, NEW YORK NYSDEC REGISTRY NO. 9-32-063 GROUNDWATER SAMPLING FIELD PARAMETERS FIELD INSTRUMENTATION CALIBRATION FORM

DATE: <u>03/17/21</u> SAMPLING F	EVENT: 5P2NG 2021												
PERSON CALIBRATING METER:	Maxwell Litter												
INSTRUMENT USED:													
MANUFACTURER: Horiba													
MODEL NUMBER:	U-52												
HGS NUMBER: $\sqrt{23}$	546AXKB												
DATE OF MANUFACT	DATE OF MANUFACTURE: <u>September</u> 2019												
CALIBRATION STANDARDS USED:													
STANDARD 7.00 METER READ:													
STANDARD 4.00 METER READ:													
STANDARD 10.00 METER READ:													
	PRE CALIBRATION READINGS	POST CALIBRATION READINGS											
TEMPERATURE (°F or <equation-block>:</equation-block>	2.67	2.81											
pH:	7.65	3.94											
pHmv:	42	-40											
OX-RED POT (ORPmv):	105	4.70											
CONDUCTIVITY (ms/cm):	1.51	1,57											
TURBIDITY (NTU):	0.0	1.1											
mg/L DO:	20.95	15.02											
% DO:	137.0	113.8											
OTHER CALIBRATION COMMENTS													
v													
Fe													

CHARLES GIBSON SITE NIAGARA FALLS, NEW YORK NYSDEC REGISTRY NO. 9-32-063 GROUNDWATER AND SEDIMENT SAMPLING FIELD FORM

RECORDED BY: KYLE EYNT	SAMPLE	D: MH	-B - 03	1721						
SAMPLED BY: 14YLE EYDT	SAMPLING	EVENT/D	ATE: SPA	u6 - 3-17-21						
COMPANY: SES		RING WELL: MA-B								
	CONDITIO	N: 630								
GROUNDWATER PURGE DATA P	URGE DATE:			/						
			NOTE: AL	L GIBSON SITE						
DEPTH TO BOTTOM FROM TOP OF RISER:		(FT.)	MONITOR	ING WELLS ARE						
DEPTH TO WATER FROM TOP OF RISER:		(FT.)	2-INCH DI	AMETER STAIN-						
WATER COLUMN:		(FT.)	LESS STE	EL. WELL DEPTHS:						
2" DIA. WELL CONST <u>AN</u>	NT: 0.16		MW-1R	12.10'						
ONE WELL VOLUME= PURGE METHOD: BOTTOM OF WELL/SILT BUILDUP:		(GALS)	MW-2 MW-A3 MW-4 MW-5	12.13' 11.95' 13.75' 15.28'						
	TOP TIME:		WW 0	10.20						
FIELD PARAMETER MEASUREMENTS:										
WELL C	PECIFIC ONDUCTIVITY mhos/cm)	TEMP. (C OR F)		NOTES:						
2										
3										
4										
,5										
TOTAL VOLUME PURGED:										
GROUNDWATER OR SEDIMENT SAMPLING	DATA:	SAMPLE D	ATE: O	31721						
MEDIA: GROUNDWATER X		SAMPLE T	IME: 09	110						
LOCATION: MH-B										
SAMPLE METHOD: DARASTALIC I	PUMP									
SAMPLING OBSERVATIONS: NONE										
QC SAMPLES TAKEN: NONE										
OTHER OBSERVATIONS/COMMENTS:										
Note: specific conductivity formula to 25 degrees		SC measur {{T-25)(0.0		-						

CHARLES GIBSON SITE NIAGARA FALLS, NEW YORK NYSDEC REGISTRY NO. 9-32-063 GROUNDWATER AND SEDIMENT SAMPLING FIELD FORM

RECORDED BY: KYLE EYDT	SAMPLE ID: MW-4
	SAMPLING EVENT/DATE: 3/17/21 3/18/21
COMPANY: 5E5	MONITORING WELL: MV 4
	CONDITION:
GROUNDWATER PURGE DATA PURGE DA	TE:
DEPTH TO BOTTOM FROM TOP OF RISER: 13.7	NOTE: ALL GIBSON SITE
22. THE BOTTOM TOM OF TROOPS.	(FT.) MONITORING WELLS ARE
DEPTH TO WATER FROM TOP OF RISER: 7,5	(FT.) 2-INCH DIAMETER STAIN-
WATER COLUMN: 4.14	(FT.) LESS STEEL. WELL DEPTHS:
2" DIA. WELL CONSTANT:	<u>0.16</u> MW-1R 12.10'
ONE WELL VOLUME=	(GALS) MW-2 12.13'
PURGE METHOD: PUMP	MW-A3 11.95' MW-4 13.75'
BOTTOM OF WELL/SILT BUILDUP:	MW-5 15.28'
PURGE START TIME: # 100 845 STOP TIME	: 0900
PURGE OBSERVATIONS: OF ANGE WATER	
FIELD PARAMETER MEASUREMENTS:	
SPECIFIC	
WELL CONDUCT	10 10 10 10 10 10 10 10 10 10 10 10 10 1
VOLUME pH umhos/cm) NOTION 91 1.25	(C OR F) NOTES:
1 7.08 1.28 2 7.20 1.26	
	7.34
4 (0.98)	7.07
5	/ , ()
TOTAL VOLUME PURGED:	
3 gallons	
GROUNDWATER OR SEDIMENT SAMPLING DATA:	SAMPLE DATE: <u>03/82/</u>
MEDIA: GROUNDWATER X	SAMPLE TIME: 0400
CREEK SEDIMENT	
LOCATION: MW-4	
SAMPLE METHOD: PUMP	
SAMPLING OBSERVATIONS: <u>OVANGE</u> WA	ATER
QC SAMPLES TAKEN: M5-M5D	
OTHER OBSERVATIONS/COMMENTS: VELL A	AN ORY FROM RUCLE
WE CAME BACK The west Day to some	
Note: specific conductivity formula to 25 degrees Celcius:	SC(25)= SC measured {{T-25}(0.02)}+1

CHARLES GIBSON SITE NIAGARA FALLS, NEW YORK NYSDEC REGISTRY NO. 9-32-063 GROUNDWATER AND SEDIMENT

SAMPLING FIELD FORM

RECORDED BY: 14YLE Fydt	SAMPLE	ID: MV-3	7 4	mw 7 30	رسان	DU
SAMPLED BY: KYLE EYOT	SAMPLIN	G EVENT/D			*	
COMPANY: SÉS	MONITOF	RING WELL:	5			
	CONDITIO	ON:				
GROUNDWATER PURGE DATA	PURGE DATE:					
	10-00			L GIBSON SI		
DEPTH TO BOTTOM FROM TOP OF RISE		(FT.)	MONITOR	RING WELLS	4RE	
DEPTH TO WATER FROM TOP OF RISEF	R:	_(FT.)	2-INCH D	IAMETER STA	IIN-	
WATER COLUMN:		(FT.)	LESS ST	EEL. WELL DE	EPTHS	3:
2" DIA. WELL CONS	STANT: 7,58 0.16	<u> </u>	MW-1R	12.10'		
ONE WELL VOLUM	E= 1,21	(GALS)	MW-2	12.13'		
PURGE METHOD: PUMP BOTTOM OF WELL/SILT BUILDUP: PURGE START TIME: 0945 PURGE OBSERVATIONS:	STOP TIME: 1000	(MW-A3 MW-4 MW-5			
FIELD PARAMETER MEASUREMENTS:						
	SPECIFIC					
WELL VOLUME pH	CONDUCTIVITY umhos/cm)	TEMP. (C OR F)		NOTES:		
() 1 INITIAL 5.74	1.4	(e.3C	* 3	NOTES.		
1 2 6.39	1.36	7.01 C		ī		
2 3 7.52	1.35	7.360				
3 4 743 6.55	1.36	7.65C				
5						
TOTAL VOLUME PURGED: 3.75 G	AL.					
GROUNDWATER OR SEDIMENT SAMPLI	NG DATA:	SAMPLE D	ATE: 0	31721		
MEDIA: GROUNDWATER	_	SAMPLE T	IME: O	00		_
LOCATION: MW-5						
SAMPLE METHOD: <u>FUMP</u>				··		
SAMPLING OBSERVATIONS: NONE						
QC SAMPLES TAKEN: blind duplicate	taken at MW5 a	is MW7	at 10	30		
OTHER OBSERVATIONS/COMMENTS:	MW5 sample	d at	1000	····		
		SC measu				
Note: specific conductivity formula to 25 deg	rees Celcius: SC(25)=	{{1-25)(0.0	2)}+1			

CHARLES GIBSON SITE NIAGARA FALLS, NEW YORK NYSDEC REGISTRY NO. 9-32-063 GROUNDWATER AND SEDIMENT SAMPLING FIELD FORM

RECORDED BY: KYLE EYNT	SAMPLE	ID: MW-A3	(
SAMPLED BY: KYLE EYNT		G EVENT/DATE: 3	17/21
COMPANY: 5E5	MONITOR	RING WELL: MW-A	13/
	CONDITIC		
GROUNDWATER PURGE DATA	PURGE DATE:		
	1100		ALL GIBSON SITE
DEPTH TO BOTTOM FROM TOP OF RISEI		(FT.) MONITO	ORING WELLS ARE
DEPTH TO WATER FROM TOP OF RISER	:_ 6.2	_(FT.) 2-INCH I	DIAMETER STAIN-
WATER COLUMN:	5.75	(FT.) LESS ST	TEEL. WELL DEPTHS:
2" DIA. WELL CONST	TANT: 0.16	<u>MW-1R</u>	12.10'
ONE WELL VOLUME	= 92	(GALS) MW-2	
PURGE METHOD: PUMP BOTTOM OF WELL/SILT BUILDUP: NO PURGE START TIME: 1100 PURGE OBSERVATIONS:	STOP TIME: 1120	MW-A3 MW-4 MW-5) 11.95' 13.75' 15.28'
FIELD PARAMETER MEASUREMENTS:			
WELL VOLUME 1 2 7.4 3 7.67 4 5	SPECIFIC CONDUCTIVITY umhos/cm) 44 34	TEMP. (C OR F) (6.55C 7.4C 7.28C	NOTES:
TOTAL VOLUME PURGED: 3 que GROUNDWATER OR SEDIMENT SAMPLIN MEDIA: GROUNDWATER X	ons NG DATA:	SAMPLE DATE: 3	1721
CREEK SEDIMENT	<u>-</u>	SAMPLE I	12()
LOCATION: MW-A3			-
SAMPLE METHOD: PUMP			
SAMPLING OBSERVATIONS: NONE			
QC SAMPLES TAKEN: NONE			-
OTHER OBSERVATIONS/COMMENTS:			
Note: specific conductivity formula to 25 degr	rees Celcius: SC(25)=	SC measured {{T-25}(0.02)}+1	_



CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

002999

1565 Jefferson Road, Building 300, Suite 360 • Rochester, NY 14623 | +1 585 288 5380 +1 585 288 8475 (fax) PAGE / OF

Project Name Charles Gibson		ANALYSIS REQUESTED (Include Method Number and Container Preservative)																					
Project Manager	Project Nun Report CC	dam (as	· mer		PRE	SERVA	TIVE				0												
Company/Address	1	claim (a)	in jo										/		1		-))		-	Preserv	ative Key
Olin corp					IERS		/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	0. NON	NE
@1 3855 North	Ocure St.				TAIN		/	/	/	/	/	/ 3	/ 3		/	/	/	/	/	/	/	 HNC H₂S NaO 	O ₄
CLEVELAND TN	37312				NUMBER OF CONTAINERS	/	GC/MS SWC (LP	0 /	8/	/ /	/ /	METALS DISCOM	SOLVED TIS belo	/ /	/ /	/ /	/ /	/ ,	/ /	//		5. Zn. / 6. MeC 7. NaH	Acetate
Phone # 923 336 4989	Email A & C	arringer@	Oliv. con	_	IBER (SVO	SSW.	45/25	9000	809	8000	Somme	Somme	/	/	/	/	/	/	/		8. Othe	
Sampler's Signature	Sampler's I	Printed Name			NCN	SC/M	SCIL SCIL	SC L	PEST	PCBS 808	METAL	METAL		/	/	/	/	/	/	/ .		REMARKS	S/ CRIPTION
	FOR OFFICE USE	SAMP	PLING			, ,					-				/					/ P	LIERN	TE DESC	RIPTION
FIELD BLANK 03 17 21	ONLY LAB ID	DATE	TIME	MATRIX	-				7														
MWS 031121 .		03/17/21	1000		1				1							V. I				ALC	/MS	1)	
MW1 03 (821		03/13/21	0900		3 (0											101	1100.		
MW703/721		03/17/21	1030		2				7														
MHB 031721		03/17/21	0910		0				- 7														
MWA3031721		63/17/21 1			5				7														
TEMP BLANN		-	**************************************		1				14.65											florided by lab			
数 11字 性线上加工方式																							
														-									
SPECIAL INSTRUCTIONS/COMMENTS Metals Shapped in	one cooler						TU			REQU			_		ORT RI		EMENT	rs		INV	OICE	NFORMA	TION
0, / ,							-			day	3 day		-	-		C Summ	naries is require	ed)	PO	•			
							Sk		/5 dard (10	business	days-No	Surcharge	e)	_ III. Res	sults + C		Calibratio		BILL	то: ()	LIN		
								JESTE		RT DA	TE			Summ_ _ IV. Dat		tion Rep	ort with	Raw Da	ta				
See QAPP								COV	,,,,,,														
STATE WHERE SAMPLES WERE CO	LLECTED													Eda	a	Yes		No					
RELINQUISHED BY	RECEIVE	O BY	RELIN	NQUISHED I	BY				RECE	IVED B	(В	ELINQ	UISHE) BY				RECE	EIVED BY	
Signature /////	Signature		Signature				Signatu	ure					Signa	ture				1	Sign	ature			
Printed Name Max Lillitor	Printed Name		Printed Name				Printed	Name					Printe	d Name					Print	Printed Name			
Firm SEVENSON	Firm		Firm				Firm						Firm						Firm	Firm			
Date/Time 03/13/21 1400	Date/Time		Date/Time		Date/Time Date/Time						Date/Time Date/Time												

CHARLES GIBSON SITE NIAGARA FALLS, NEW YORK NYSDEC REGISTRY NO. 9-32-063 GROUNDWATER AND SEDIMENT SAMPLING FIELD FORM

RECORDED BY: WM KON	SAMPLE ID: U5-1-092021
SAMPLED BY: howkon	SAMPLING EVENT/DATE: 9-20-21
COMPANY: Sevenson	MONITORING WELL: SEDIMENT (RESK) UP STAGENTING
	CONDITION: OL
GROUNDWATER PURGE DATA PURG	GE DATE:
DEPTH TO BOTTOM FROM TOP OF RISER:	NOTE: ALL GIBSON SITE (FT.) MONITORING WELLS ARE
DEPTH TO WATER FROM TOP OF RISER:	(FT.) 2-INCH DIAMETER STAIN-
WATER COLUMN:	(FT.) LESS STEEL. WELL DEPTHS:
2" DIA. WELL CONST <u>ANT:</u>	0.16 MW-1R 12.10'
ONE WELL VOLUME=	(GALS) MW-2 12.13'
PURGE METHOD: BOTTOM OF WELL/SILT BUILDUP: PURGE START TIME: STOI PURGE OBSERVATIONS:	MW-A3 11.95' MW-4 13.75' MW-5 15.28' P TIME:
FIELD PARAMETER MEASUREMENTS:	\times
WELL	CIFIC DUCTIVITY TEMP. ps/cm) (C OR F) NOTES:
5	
TOTAL VOLUME PURGED:	
GROUNDWATER OR SEDIMENT SAMPLING DA	TA: SAMPLE DATE: 9-20 -2
MEDIA: GROUNDWATER CREEK SEDIMENT	SAMPLE TIME: 1430
LOCATION: CREEK SERMENT Upstrang	of LANDER Cap NEW DEWELLEY Fites
SAMPLE METHOD: SEOMENT TAY	
SAMPLING OBSERVATIONS: Prous + 1	Stack mys
QC SAMPLES TAKEN: Duplicate Souple T	Les And CAbele M3-1-092021 - Tune 144
OTHER OBSERVATIONS/COMMENTS:	
Note: specific conductivity formula to 25 degrees Co	SC measured elcius: SC(25)= {{T-25)(0.02)}+1

CHARLES GIBSON SITE NIAGARA FALLS, NEW YORK NYSDEC REGISTRY NO. 9-32-063 GROUNDWATER AND SEDIMENT SAMPLING FIELD FORM

RECORDED BY: \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	SAMPLE ID: DS-	1000000
CAMPI ED DY		A
SAMPLED BY: M. WALKON	SAMPLING EVENT/D	
COMPANY: Soverson	MONITORING WELL	CASIK SEDIMENT DOWN SASH
	CONDITION: Good	2 of Cap
GROUNDWATER PURGE DATA PURGE DA	ATE:	
DEDTIL TO DOTTOM FROM TOD OF BIOER	`	NOTE: ALL GIBSON SITE
DEPTH TO BOTTOM FROM TOP OF RISER:	(FT.)	MONITORING WELLS ARE
DEPTH TO WATER FROM TOP OF RISER:	(FT.)	2-INCH DIAMETER STAIN-
WATER COLUMN:	(FT.)	LESS STEEL. WELL DEPTHS:
2" DIA. WELL CONSTANT:	0.16	MW-1R 12.10'
ONE WELL VOLUME=	(GALS)	MW-2 12.13'
DUDGE METHOD.		MW-A3 11.95'
PURGE METHOD: BOTTOM OF WELL/SILT BUILDUP:		MW-4 13.75' MW-5 15.28'
PURGE START TIME: STOP TIM	E:	10.20
PURGE OBSERVATIONS:		·
FIELD PARAMETER MEASUREMENTS:		
SPECIFIC		
WELL CONDUCT	IVITY TEMP.	_
VOLUME pH umhos/cm	(C OR F)	NOTES:
1		
2	,	
3		
4		
5		
TOTAL VOLUME PURGED:	ū.	
GROUNDWATER OR SEDIMENT SAMPLING DATA:	CAMPLE	NATE: 0 2
GROUNDWATER OR SEDIMENT SAMPLING DATA:	SAMPLE [DATE: 4-20-21
MEDIA: GROUNDWATER CREEK SEDIMENT	SAMPLE 1	IME: No Sample
LOCATION: carter of Creak . 3 force pot	Fry Conver, Don	in streem of Cy
SAMPLE METHOD: SEDMENT TANK - Sub.	margicel .	
SAMPLING OBSERVATIONS: SEDMENT TAND W	K FOUND MASINE	lan in cheek BUD
QC SAMPLES TAKEN: No stancet w	s in trup. No	sample Taken.
OTHER OBSERVATIONS/COMMENTS:	SEE ASOVE	
I Chaned the Map and RESET 5	SC measu	red C
Note: specific conductivity formula to 25 degrees Celcius		

I



CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

061202

1565 Jefferson Road, Building 300, Suite 360 • Rochester, NY 14623 | +1 585 288 5380 +1 585 288 8475 (fax) PAGE _____OF ____

Project Name Project Number						ANALYSIS REQUESTED (Include Method Number and Container Preservative)																	
OUN CHALLESS GIBSON S	Report CC	9									<u> </u>					Ī			T				
Aban Callaction Company/Address		Croninge	n		PRE	SERVA	ATIVE				0					L,	L,	Ĺ,					
OLID CONP - Cas	EDGASTE ENV	Ruedat	ian Crow	P	lRS																	Preserva 0. NONE 1. HCL	ive Key
3855 NORTH 490 Stuart Rd					NUMBER OF CONTAINERS															/ ,		 HNOg H₂SO NaOH 	4
CLEVE	Email Email	N 3731	2		OF CC	/	GCMS SVO.	* /	200	/ /	METALS, TOTA	AL Surs be	Comments below	/ /					/ /			 Zn. A MeOł NaHS 	1
Phone # 423=508-2768 ABCALLWGOL @ OLIN. COM Sampler's Signature Sampler's Printed Name					MBER	1810	18 84	18 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	, 601/ CODE		14.8, 70	LS. D.	Somm									8. Other	
Sampler's Signature	Sampler's P	rinted Name WALK	EN		N		GC/MS SVO.	13.00	PES,	PCBs 608	MET (List ir	MET,				/_,				/ AI		EMARKS/ TE DESCE	IPTION
CLIENT SAMPLE ID	FOR OFFICE USE ONLY LAB ID	SAMP	LING TIME	MATRIX																			
US-1-092021		9-20-21	1430	SED	1				i														
MS-1-092621		9-20-21	1445	Sen	(1														
DS-1-092021		9-10-21		500	+				+	_													
					<u> </u>																		
																				-			
SPECIAL INSTRUCTIONS/COMMENTS				1	TURNAROUND REQUIREMENTS REPORT REQUIREMENTS INVOICE INFORM.							NFORMAT	ION										
No DS-1-09 2 MATERIAL 1-2 SE	021 WAS	taken Di	se to l	Ack of				_ RUSI	H (SURC	CHARGE	S APPLY)	-	_ I. Resu	ılts Only								
Matrical 12 50	suced trao							-			3 day		×	_		C Summ S/MSD a	aries s require	ed)	PO#				
	, 0	Chris					X		dard (10	200	days-No S	Surcharg	e)			C and C	Calibratio	n	BILL		~1	cens	
							REQU	JESTE	REPO	ORT DAT	ΓE			Summ		tion Ren	ort with	Raw Dat					
See QAPP																							
STATE WHERE SAMPLES WERE COI	LECTED Nation	YOLK											1	Edat	a	Yes		No			/		
RELINQUISHED BY	RECEIVED		REL	INQUISHED	BY				RECE	IVED B	Y			R	ELINQ	UISHE) BY			RECEIVED BY			
Signature 9 3 30 l	Signature		Signature				Signatu	ure					Signa	iture					Signa	ature			
Printed Name	Printed Name UPS	DRIVER	Printed Name				Printed	Name					Printe	ed Name					Print	ed Name			
Firm	Firm ves		Firm				Firm						Firm	m					Firm	Firm			
Date/Time 9/10/11 /505m	Date/Time		Date/Time		Date/Time						Date/	Date/Time					Date	Date/Time					

<u>Attachment D</u>

Site Inspection Forms

DATE:	ATE: <u>2/24/2021</u> TIME:		TIME:	1300	<u> </u>
INSPECT(OR:	Jones		COMPANY:	Sevenson
WEATHE	R.	40 sunny			
VVLATTIL	ix.	40 Suring			
REASON	FOR INSPE	ECTION (Q	UARTERLY	OR OTHER):	power check on system
GENERAL	_ SITE CON	IDITIONS:		U=UNACCEPTABL	LE A=ACCEPTABLE
	•	-			pare areas (number,size), cracks, tion, soil discoloration or seeps,
			•		of locks, gates open or damaged,
	missing sig	gns or evide	ence of van	dalism. Note any oth	ner unusual occurences.)
				COMME	ENTS
ACCESS		N I			
COVER V TREES	EGETATIO	IN			
LITTER					
EROSION	I (CAD)				
EROSION	` ,				
	,			-	
SECURIT	Y:				
FENCE/LO	OCKS				
PIEZOME	TERS/LOC	KS			
MONITOF	RING WELL	S/LOCKS		-	
MANHOLI	ES/LIDS/LC	CKS		· -	
ELECTRIC	CAL PANEL				
ADDITION	NAL COMM	ENTS:			
The alarm	agent faile	d to send o	ut watch do	g check-ins. Seven	son arrived to a secure site and made sure th
nower was	s on. Ran th	ne pump or	n manual fo	r a few minutes. The	e water level was around 15 feet.
M Walker	has ordered	d new alarn	n parts that	are compatible with	5G service.

THIS FORM TO BE USED FOR DATE: $3/17/2/$	R QUARTERLY AN TIME: <i>_12</i>		THER SITE INSPECTIONS
INSPECTOR: 14/1E EY	CON	лРАNY <u>:</u>	365
WEATHER:			
REASON FOR INSPECTION (QUARTERLY OR (OTHER <u>):</u>	Quartonly Tuspertion 1st 2021
subsidence (sinking and rodent burrows	site conditions note), ponded water, st . For site security,	existence ressed ve note abse	PTABLE A=ACCEPTABLE e of bare areas (number,size), cracks, egetation, soil discoloration or seeps, ence of locks, gates open or damaged, ny other unusual occurences.)
	٨	C	OMMENTS
ACCESS ROAD	14	·	
COVER VEGETATION	<u> </u>		
TREES		_	
LITTER		-	
EROSION (CAP)	— A		
EROSION (BANK)	_ / _	-	
SECURITY:			
FENCE/LOCKS	A		
PIEZOMETERS/LOCKS	A		
MONITORING WELLS/LOCKS	A		
MANHOLES/LIDS/LOCKS	A		
ELECTRICAL PANEL	4		
ADDITIONAL COMMENTS:	HOMELESS	904	That was LIVING on SITE
			OCAL POLICE TALKED TO
UM.			

THIS FORM TO BE USED FOR		L OTHER SITE INSPECTIONS
DATE: <u>5/12/21</u>	_TIME: <u>0930</u>	
INSPECTOR: Maxwell L'A	fiton COMPAN	y: Sevenson
weather: Sunny, 50°	·F	
REASON FOR INSPECTION (C	UARTERLY OR OTHE	R): Ovarterly
subsidence (sinking) and rodent burrows.	te conditions note existe , ponded water, stresse For site security, note a	CEPTABLE A=ACCEPTABLE ence of bare areas (number,size), cracks, d vegetation, soil discoloration or seeps, absence of locks, gates open or damaged, e any other unusual occurences.)
		COMMENTS
ACCESS ROAD	<u></u>	
COVER VEGETATION		
TREES	A	
LITTER	A	
EROSION (CAP)	<u> </u>	REGISTRATE CONTROL CON
EROSION (BANK)		
SECURITY:		
FENCE/LOCKS PIEZOMETERS/LOCKS MONITORING WELLS/LOCKS MANHOLES/LIDS/LOCKS ELECTRICAL PANEL	A U A A	P-2 cover eyehole has snapped off. Without removing lock.
ADDITIONAL COMMENTS:	Site grass is	fairly long.
		, , , , , , , , , , , , , , , , , , ,

THIS FORM TO BE USED FOR QUARTERLY AND ALL OTHER SITE INSPECTIONS
DATE: 9-20-21 TIME: 100 pm
INSPECTOR: WALKER COMPANY: SONEWSON
WEATHER: CLOVERY 78°F
REASON FOR INSPECTION (QUARTERLY OR OTHER): Fall Sough work + 3 ld inspection
GENERAL SITE CONDITIONS: U=UNACCEPTABLE A=ACCEPTABLE (Note: For general site conditions note existence of bare areas (number,size), cracks, subsidence (sinking), ponded water, stressed vegetation, soil discoloration or seeps, and rodent burrows. For site security, note absence of locks, gates open or damaged, missing signs or evidence of vandalism. Note any other unusual occurences.)
COMMENTS
ACCESS ROAD A GCON
COVER VEGETATION
TREES
LITTER A SOUR BUT PICKED OP.
EROSION (CAP)
EROSION (BANK)
SECURITY:
FENCE/LOCKS A
PIEZOMETERS/LOCKS A OK
MONITORING WELLS/LOCKS A OK
MANHOLES/LIDS/LOCKS A OK
ELECTRICAL PANEL A OF
ADDITIONAL COMMENTS: SITE LOOKS GOOD. Rapaine song
wood planks on Fence, growth on chook Bank mongst light
is getting thicken + Tall, Do we pred to maintain that?

R

DATE: \\-\-\-\-\-\-\-\-\-\-\-\-\-\-\-\-\-\-\	PLY AND ALL OTHER SITE INSPECTIONS
INSPECTOR: MIKE WALKEN	COMPANY: SOUGHSON
WEATHER: SONNY 55°F	
REASON FOR INSPECTION (QUARTERL)	YOROTHER): 4th Quarter site inspection 2021
subsidence (sinking), ponded wa and rodent burrows. For site se	U=UNACCEPTABLE A=ACCEPTABLE as note existence of bare areas (number,size), cracks, ater, stressed vegetation, soil discoloration or seeps, curity, note absence of locks, gates open or damaged, andalism. Note any other unusual occurences.)
ACCESS ROAD COVER VEGETATION TREES LITTER EROSION (CAP) EROSION (BANK)	COMMENTS
SECURITY:	
FENCE/LOCKS PIEZOMETERS/LOCKS MONITORING WELLS/LOCKS MANHOLES/LIDS/LOCKS ELECTRICAL PANEL	P-2 Led was caretal, I andrew A war one
ADDITIONAL COMMENTS: 51te	Looked 6000, ALL wort well.
	

<u>Tables</u>

TABLE 1 CHARLES GIBSON SITE NIAGARA FALLS, NEW YORK

ANALYTICAL SUMMARY GROUND WATER SAMPLING 2015-2021

MONITOR WELL: MW-A3

		2015		2016 2017		2018		2019		2020		2021		
Parameter	May	September	May	September	May	September	May	September	May	September	May	September	March	September
Alpha-BHC	0.047U	NR	NŔ	· -	0.047U	NR	NŔ	-	-	NR	NŔ	, -	0.049U	NR
Beta-BHC	0.047U	NR	NR	-	0.047U	NR	NR	-	-	NR	NR	-	0.049U	NR
Gamma-BHC	0.047U	NR	NR	-	0.047U	NR	NR	-	-	NR	NR	-	0.049U	NR
Delta-BHC	0.047U	NR	NR	-	0.047U	NR	NR	-	-	NR	NR	-	0.049U	NR
Hexachlorobenzene	NR	NR	NR	-	NR	NR	NR	-	-	NR	NR	-	NR	NR

MONITOR WELL: MW-4

		2015		2016		2017		2018		2019		2020		2021
Parameter	May	September	May	September	May	September	May	September	May	September	May	September	March	September
Alpha-BHC	0.047U	NR	NR	0.056U	0.047U	NR	NR	0.047U	0.13	NR	NR	0.047U	0.045U	NR
Beta-BHC	0.047U	NR	NR	0.056U	0.047U	NR	NR	0.047U	0.047U	NR	NR	0.047U	0.045U	NR
Gamma-BHC	0.047U	NR	NR	0.056U	0.047U	NR	NR	0.047U	0.48	NR	NR	0.047U	0.045U	NR
Delta-BHC	0.047U	NR	NR	0.056U	0.047U	NR	NR	0.047U	0.18	NR	NR	0.047U	0.045U	NR
Hexachlorobenzene	NR	NR	NR	10U	NR	NR	NR	9.4U	NR	NR	NR	9.4U	NR	NR

MONITOR WELL: MW-5

		2015		2016		2017		2018		2019		2020		2021	
Parameter	May	September	May	September	May	September	May	September	May	September	May	September	March	September	
Alpha-BHC	0.047U	NR	NR	0.056U	0.047U	NR	NR	0.047U	0.1	NR	NR	0.047U	0.050U	NR	
Beta-BHC	0.047U	NR	NR	0.056U	0.047U	NR	NR	0.047U	0.047U	NR	NR	0.047U	0.050U	NR	
Gamma-BHC	0.047U	NR	NR	0.056U	0.047U	NR	NR	0.047U	0.41	NR	NR	0.047U	0.050U	NR	
Delta-BHC	0.047U	NR	NR	0.056U	0.047U	NR	NR	0.047U	0.25	NR	NR	0.047U	0.050U	NR	
Hexachlorobenzene	NR	NR	NR	10U	NR	NR	NR	9.4U	NR	NR	NR	9.4U	NR	NR	

Notes: Concentration in ug/l

- insufficient sample

U Not detected at reported quantitation limit

J Estimated value

NR Not required

Next hexachlorobenzene (HCB) sampling scheduled for fall 2022.

Table 2 Annual Manhole B Sampling

CHARLES GIBSON SITE NIAGARA FALLS, NEW YORK

ANALYTICAL RESULTS SUMMARY ANNUAL LEACHATE SAMPLING

May 17, 2021

	MANHOLE B (MHB)
PARAMETER	
alpha-BHC	0.054U
beta-BHC	0.13J
delta-BHC	0.054U
gamma-BHC	0.054U
Hexachlorobenzene	NR

Notes:

U - Not detected at reported quantitation limit

J - Estimated value (see data narrative)

NR - Not Required

Concentration in ug/L

Field blank was non-detect for all parameters of interest.

Data has been validated and judged acceptable as qualified.

Next hexachlorobenzene (HCB) sampling scheduled for fall 2022.

TABLE 3 Charles Gibson Site Niagara Falls, New York

ANALYTICAL SUMMARY

Annual Cayuga Creek Sediment Sampling 2010 - 2021

UPSTREAM

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	20	20	2021
Parameter	September	May	September	September									
Alpha- BHC	94	200J	17	170J	120	NS	9.7	200	57U	3200	270	32U	150U
Beta- BHC	97	120J	48	190J	280	NS	25	190	57U	1100	350	32U	150U
Gamma- BHC	33J	190U	5.5U	28U	49U	NS	5.6U	51U	57U	510U	59U	32U	150U
Delta- BHC	52J	140J	23	28U	49U	NS	19	51U	57U	510U	59U	32U	150U

DOWNSTREAM

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	20	20	2021
Parameter	September	May	September	September									
Alpha- BHC	53J	230J	9.8	29U	55	52U	7	69U	63U	NS	73U	40U	NS
Beta- BHC	62J	130J	37	89	100	76	18	87	63U	NS	110	40U	NS
Gamma- BHC	63U	220U	5.9U	29U	52U	52U	4.9U	69U	63U	NS	73U	40U	NS
Delta- BHC	56J	170J	18	29U	52U	52U	15	69U	63U	NS	73U	40U	NS

Notes:

Concentration in microgram per kilogram (ug/kg)

U Not detected at reported quantitation limit

J Estimated value

NS No sample in trap

Table 4 **2021 Quarterly Groundwater Elevations Summary**

Piezometer Pair	3/17/2021	Inward gradient	5/12/2021	Inward gradient	9/20/2021	Inward gradient	11/08/2021	Inward gradient
P1 outside P2 inside	563.99 570.51	Outward	565.47 565.44	Inward	564.73 565.48	Outward	565.18 565.54	Outward
P3 outside P4 inside	567.72 565.28	Inward	568.11 565.18	Inward	564.28 565.78	Outward	567.70 565.49	Inward
P5 outside P6 inside	568.79 567.12	Inward	568.62 567.15	Inward	567.75 567.13	Inward	569.17 567.68	Inward
		Below 565 ft msl		Below 565 ft msl		Below 565 ft msl		Below 565 ft msl
Manhole A Manhole B	562.61 562.66	Yes Yes	562.87 562.94	Yes Yes	562.81 562.90	Yes Yes	562.81 562.90	Yes Yes

Notes: Measurement units are in feet above MSL.

Piezometers P1, P3, P5 are outside the slurry wall.
Piezometers P2, P4, P6 are located within the containment area.

NA - Not Available

Manhole monitoring:

- Maintain water level below 565 feet to prevent hydrostatic pressure buildup under concrete slab.
- Pump Manhole B as required to maintain an inward gradient.

Table 4B - Groundwater Elevations Data

PIEZOMETER								
DATE	P1	P2	Р3	P4	P5	P6	MHA	МНВ
2/13/2008	NA	NA	NA	NA	NA	NA	NA	NA
4/3/2008	565.44	565.50	567.55	565.44	569.84	567.99	564.13	564.17
9/11/2008	566.13	565.28	566.31	565.20	568.37	567.39	564.11	564.23
11/5/2008	565.46	565.24	566.52	565.17	568.76	567.43	563.81	563.89
2/13/2009	NA	NA	NA	NA	NA	NA	NA	NA
4/2/2009	565.46	565.43	566.81	565.34	569.11	567.77	563.97	564.03
9/17/2009	566.37	565.42	566.51	565.29	568.60	567.58	563.67	563.74
11/23/2009	565.31	565.29	566.41	565.24	568.70	567.37	563.52	563.61
3/3/2010	565.27	565.42	566.18	565.22	568.83	567.57	563.77	563.84
4/14/2010	565.72	565.46	567.05	565.19	569.45	567.77	564.02	564.09
9/17/2010	566.40	565.20	564.91	565.07	567.23	566.93	564.20	563.68
11/11/2010	564.53	565.16	565.57	565.02	567.40	566.78	563.82	563.88
3/9/2011	565.05	565.49	568.11	565.42	569.75	567.88	563.94	564.03
4/19/2011	565.50	565.48	567.74	565.26	569.46	567.77	564.01	564.15
9/22/2011	565.54	565.28	565.11	565.18	567.27	567.09	563.42	563.46
11/8/2011	565.33	565.41	567.41	565.28	568.77	567.53	563.32	563.40
3/15/2012	565.36	565.54	568.25	565.34	569.23	567.75	564.21	567.27
5/22/2012	566.01	565.50	567.40	565.46	569.01	567.75	563.40	563.49
9/17/2012	564.50	565.26	564.37	565.16	566.77	566.80	563.47	563.53
11/9/2012	564.51	565.38	568.28	565.22	568.40	567.25	563.62	563.99
3/6/2013	565.32	565.54	569.56	565.34	569.35	567.83	563.92	564.09
5/13/2013	565.63	565.43	567.74	565.24	568.75	567.63	563.67	563.73
9/18/2013	565.62	565.33	566.04	565.26	567.79	567.24	563.29	563.33
11/6/2013	565.35	565.51	569.11	566.09	569.17	567.70	563.36	563.42
3/18/2014	565.34	565.49	569.24	565.19	569.35	567.76	563.86	563.89
5/9/2014	565.50	565.50	568.44	565.35	569.36	567.82	563.83	563.91
9/18/2014	565.54	566.88	565.37	568.55	567.76	567.17	563.27	563.32
12/8/2014	566.65	565.08	568.15	565.15	568.14	566.86	563.50	563.56
3/11/2015	565.15	564.68	567.45	565.15	568.39	567.07	568.80	563.89
5/27/2015	565.84	565.53	566.71	565.44	568.46	567.49	563.84	563.83
9/1/2015	565.16	565.41	565.17	565.49	567.46	577.07	563.51	563.54
11/10/2015	564.97	565.40	566.11	565.34	568.92	567.07	563.67	563.76
3/8/2016	565.08	565.67	570.39	565.46	569.34	567.67	563.51	563.59
5/27/2016	565.87	565.56	567.24	565.50	568.60	567.88	563.94	563.48
9/8/2016	564.27	565.37	563.95	565.33	566.18	566.53	563.32	563.49
11/11/2016	563.28	565.11	565.17	565.17	565.44	566.13	563.36	563.39
3/7/2017	565.22	565.58	570.75	565.37	568.68	567.07	563.64	563.74
5/30/2017	566.00	566.31	568.71	565.43	569.09	567.63	563.57	563.63
9/6/2017	565.12	565.48	565.88	565.49	566.60	567.33	563.40	563.49
11/21/2017	565.01	565.51	569.92	565.43	569.24	567.60	563.52	563.60
3/13/2018	565.64	565.54	568.64	565.49	568.26	567.77	563.77	563.79
5/24/2018	565.90	565.53	567.21	565.35	568.70	567.57	563.24	563.31
9/25/2018	564.33	565.34	563.86	569.13	566.20	567.12	563.10	563.14
11/18/2018	563.33	565.19	568.91	568.16	568.85	566.57	563.21	563.25
3/7/2019	565.52	565.58	567.96	567.75	569.08	567.67	563.90	563.99
5/21/2019	566.11	565.58	568.87	565.46	569.43	567.88	563.63	563.69
9/24/2019	564.91	565.35	564.71	565.22	567.90	567.17	562.94	563.03
11/6/2019	564.74	565.40	567.51	565.19	568.85	567.36	563.08	563.14
3/19/2020	565.57	566.69	568.44	566.59	569.24	567.78	566.53	566.62
5/18/2020	566.49	565.55	567.55	565.51	568.85	567.58	560.67	560.72
9/22/2020	563.89	565.36	563.63	565.19	566.49	566.62	561.88	561.98
11/12/2020	563.02	565.17	562.54	564.89	565.75	566.16	562.03	562.09
3/17/2021	563.99	570.51	567.72	565.28	568.79	567.12	562.61	562.66
5/12/2021	565.47	565.44	568.11	565.18	568.62	567.15	562.87	562.94
9/20/2021	564.73	565.48	564.28	565.78	567.75	567.13	562.81	562.90
J/ 20/ 2021	JUT./J	JUJ. 7 U	307.20	505.70	307.73	307.13	302.01	302.30

Table 5 Olin Corp. Gibson Site Discharge Volumes

Summary of Yearly Discharge Volumes

Monthly Discharge Volumes 2021

Date	Volume (gallons)	Month	Volume (gallons)
2010	28,118	Jan	0
2011	40,625	Feb	126
2012	29,623	Mar	0
2013	46,766	Apr	0
2014	33,564	May	0
2015	18,537	Jun	0
2016	28,172	Jul	25,470
2017	35,492	Aug	7,033
2018	33,837	Sep	0
2019	47,182	Oct	0
2020	297,712	Nov	4,000
2021	43,740	Dec	7,111
TOTALS	683,368	TOTALS	43,740

Table 6 - Seasonal Piezometer Data

			PIEZO	METER - Sp	ring			
DATE	P1	P2	Р3	P4	P5	P6	MHA	МНВ
2/13/2008	NA	NA	NA	NA	NA	NA	NA	NA
4/3/2008	565.44	565.50	567.55	565.44	569.84	567.99	564.13	564.17
2/13/2009	NA	NA	NA	NA	NA	NA	NA	NA
4/2/2009	565.46	565.43	566.81	565.34	569.11	567.77	563.97	564.03
3/3/2010	565.27	565.42	566.18	565.22	568.83	567.57	563.77	563.84
4/14/2010	565.72	565.46	567.05	565.19	569.45	567.77	564.02	564.09
3/9/2011	565.05	565.49	568.11	565.42	569.75	567.88	563.94	564.03
4/19/2011	565.50	565.48	567.74	565.26	569.46	567.77	564.01	564.15
3/15/2012	565.36	565.54	568.25	565.34	569.23	567.75	564.21	567.27
5/22/2012	566.01	565.50	567.40	565.46	569.01	567.75	563.40	563.49
3/6/2013	565.32	565.54	569.56	565.34	569.35	567.83	563.92	564.09
5/13/2013	565.63	565.43	567.74	565.24	568.75	567.63	563.67	563.73
3/18/2014	565.34	565.49	569.24	565.19	569.35	567.76	563.86	563.89
5/9/2014	565.50	565.50	568.44	565.35	569.36	567.82	563.83	563.91
3/11/2015	565.15	564.68	567.45	565.15	568.39	567.07	568.80	563.89
5/27/2015	565.84	565.53	566.71	565.44	568.46	567.49	563.84	563.83
3/8/2016	565.08	565.67	570.39	565.46	569.34	567.67	563.51	563.59
5/27/2016	565.87	565.56	567.24	565.50	568.60	567.88	563.94	563.48
3/7/2017	565.22	565.58	570.75	565.37	568.68	567.07	563.64	563.74
5/30/2017	566.00	566.31	568.71	565.43	569.09	567.63	563.57	563.63
3/13/2018	565.64	565.54	568.64	565.49	568.26	567.77	563.77	563.79
5/24/2018	565.90	565.53	567.21	565.35	568.70	567.57	563.24	563.31
3/7/2019	565.52	565.58	567.96	567.75	569.08	567.67	563.90	563.99
5/21/2019	566.11	565.58	568.87	565.46	569.43	567.88	563.63	563.69
3/19/2020	565.57	566.69	568.44	566.59	569.24	567.78	566.53	566.62
5/18/2020	566.49	565.55	567.55	565.51	568.85	567.58	560.67	560.72
3/17/2021	563.99	570.51	567.72	565.28	568.79	567.12	562.61	562.66
5/12/2021	565.47	565.44	568.11	565.18	568.62	567.15	562.87	562.94

NA-Not Available

			PIEZ	OMETER - F	all			
DATE	P1	P2	P3	P4	P5	P6	MHA	МНВ
9/11/2008	566.13	565.28	566.31	565.20	568.37	567.39	564.11	564.23
11/5/2008	565.46	565.24	566.52	565.17	568.76	567.43	563.81	563.89
9/17/2009	566.37	565.42	566.51	565.29	568.60	567.58	563.67	563.74
11/23/2009	565.31	565.29	566.41	565.24	568.70	567.37	563.52	563.61
9/17/2010	566.40	565.20	564.91	565.07	567.23	566.93	564.20	563.68
11/11/2010	564.53	565.16	565.57	565.02	567.40	566.78	563.82	563.88
9/22/2011	565.54	565.28	565.11	565.18	567.27	567.09	563.42	563.46
11/8/2011	565.33	565.41	567.41	565.28	568.77	567.53	563.32	563.40
9/17/2012	564.50	565.26	564.37	565.16	566.77	566.80	563.47	563.53
11/9/2012	564.51	565.38	568.28	565.22	568.40	567.25	563.62	563.99
9/18/2013	565.62	565.33	566.04	565.26	567.79	567.24	563.29	563.33
11/6/2013	565.35	565.51	569.11	566.09	569.17	567.70	563.36	563.42
9/18/2014	565.54	566.88	565.37	568.55	567.76	567.17	563.27	563.32
12/8/2014	566.65	565.08	568.15	565.15	568.14	566.86	563.50	563.56
9/1/2015	565.16	565.41	565.17	565.49	567.46	577.07	563.51	563.54
11/10/2015	564.97	565.40	566.11	565.34	568.92	567.07	563.67	563.76
9/8/2016	564.27	565.37	563.95	565.33	566.18	566.53	563.32	563.49
11/11/2016	563.28	565.11	565.17	565.17	565.44	566.13	563.36	563.39
9/6/2017	565.12	565.48	565.88	565.49	566.60	567.33	563.40	563.49
11/21/2017	565.01	565.51	569.92	565.43	569.24	567.60	563.52	563.60
9/25/2018	564.33	565.34	563.86	569.13	566.20	567.12	563.10	563.14
11/18/2018	563.33	565.19	568.91	568.16	568.85	566.57	563.21	563.25
9/24/2019	564.91	565.35	564.71	565.22	567.90	567.17	562.94	563.03
11/6/2019	564.74	565.40	567.51	565.19	568.85	567.36	563.08	563.14
9/22/2020	563.89	565.36	563.63	565.19	566.49	566.62	561.88	561.98
11/12/2020	563.02	565.17	562.54	564.89	565.75	566.16	562.03	562.09
9/20/2021	564.73	565.48	564.28	565.78	567.75	567.13	562.81	562.90
11/8/2021	565.18	565.54	567.70	565.49	569.17	567.68	562.81	562.90

Table 4B - Groundwater Elevations Data

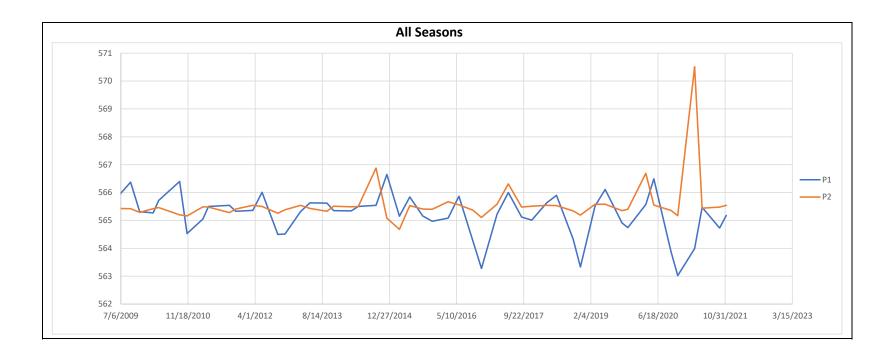


Table 4B - Groundwater Elevations Data

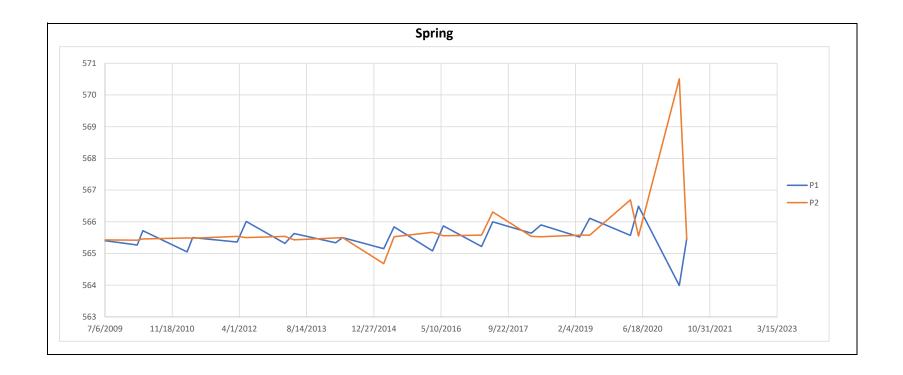


Table 4B - Groundwater Elevations Data

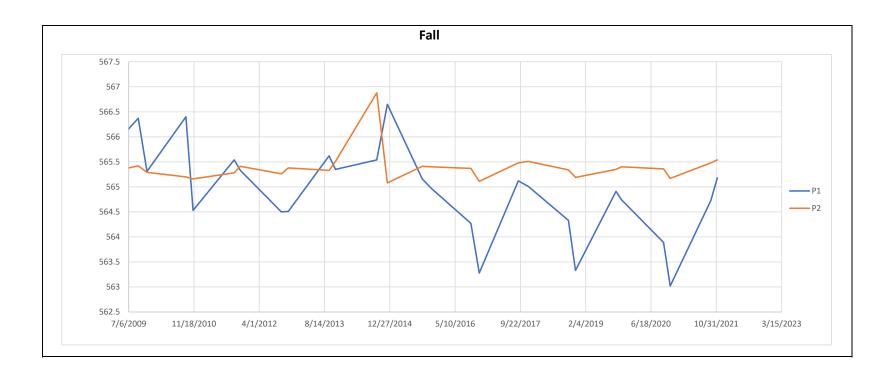


Table 4B - Groundwater Elevations Data

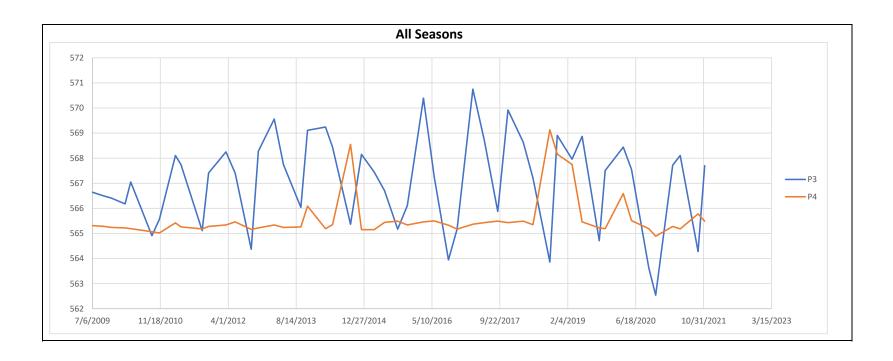


Table 4B - Groundwater Elevations Data

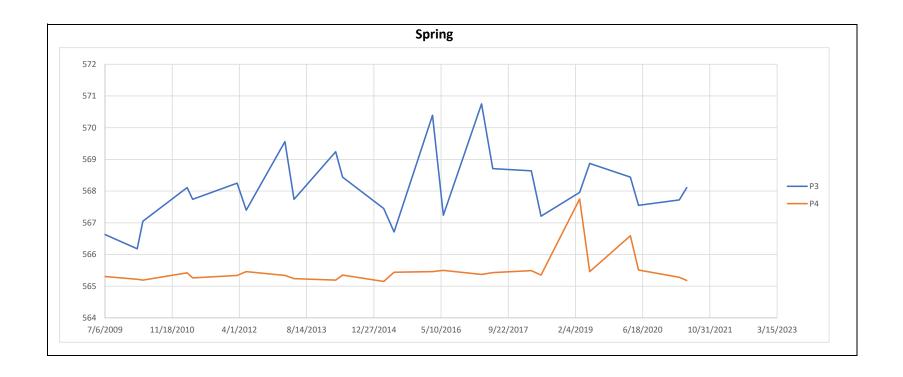


Table 4B - Groundwater Elevations Data

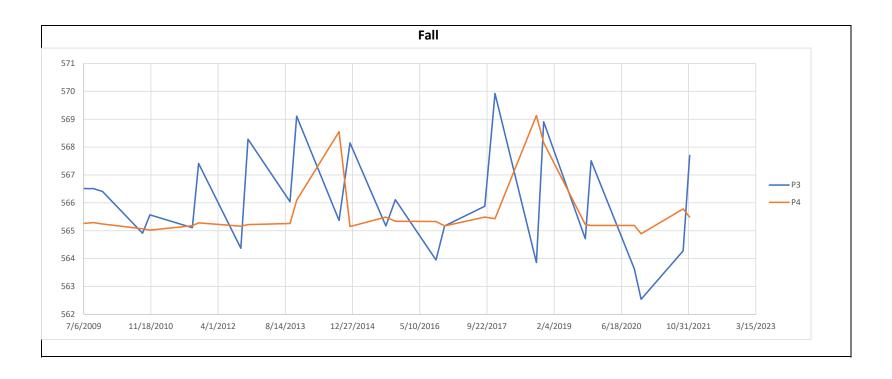


Table 4B - Groundwater Elevations Data

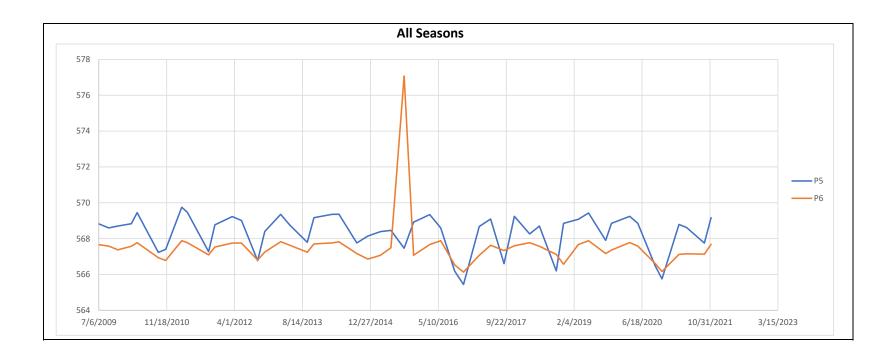


Table 4B - Groundwater Elevations Data

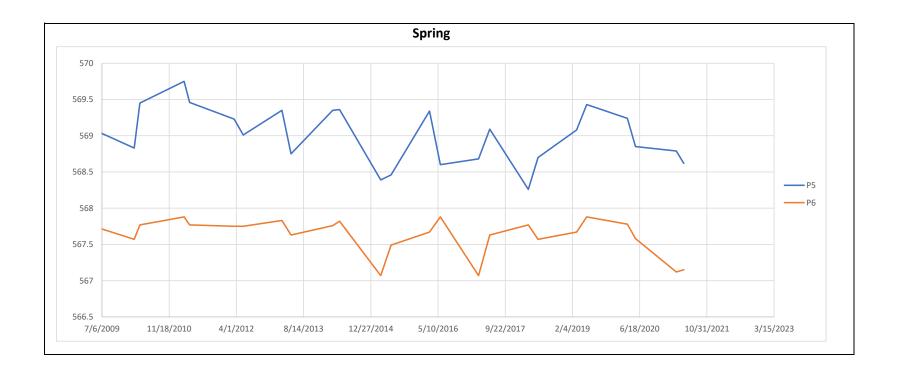


Table 4B - Groundwater Elevations Data

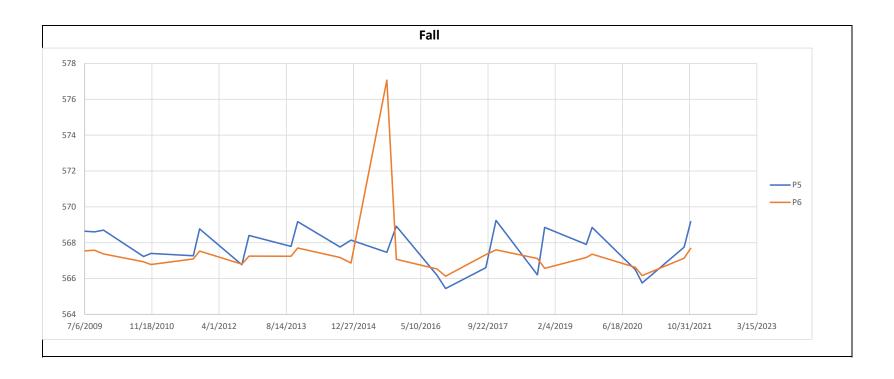
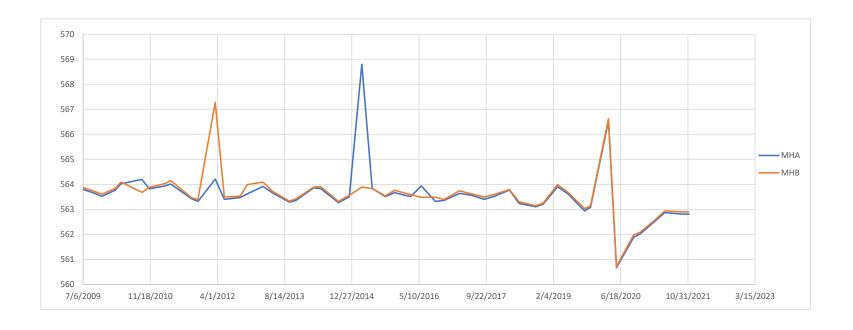
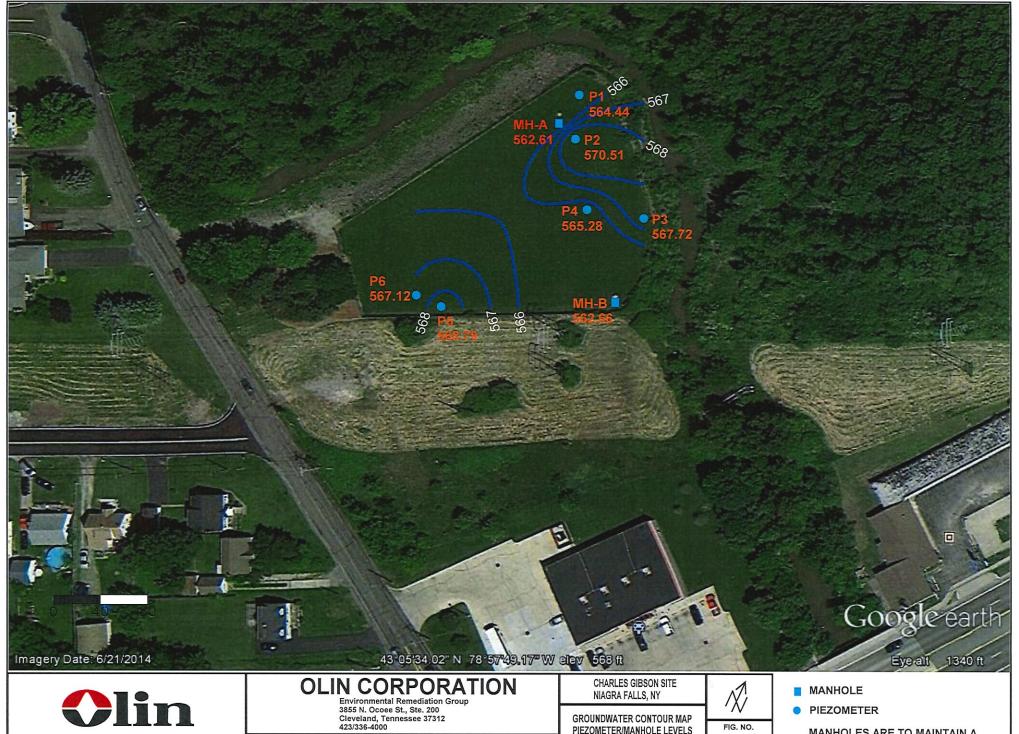


Table 4B - Groundwater Elevations Data



DATE: 03/11	121	_TIME:	0900		
INSPECTOR: M	x Liffton	_COMPANY:_	SES		
WEATHER: (Jov	A				
					0014451450
PIEZOMETER	RISER ELEVATION (INSIDE CASING)	DEPTH TO V (FT.)	VATER	WATER ELEVATION	COMMENTS
P-1	572.72	8.28		563.99	
P-2	574.89	4.38		570.51	
P-3	574.16	6.44		567.72	
P-4	576.14	10.86		565.28	
P-5	575.05	6.26		568.79	1
P-6	578.28	11.16		567.12	
MANHOLE A	575.22	12.61		562.61	
MANHOLE B	577.34	14.68		562.66	
Niagara Tuscarora R in Manhole B (and by water distance from t (Note: riser elevation	npties into Manhole B by Road sanitary sewer line y extension Manhole A) the manhole rim should is (re)surveyed Septemi	by a float contribelow an elevant be less that ber, 1999 by W	rolled sur ation of 50 an 12.41	mp pump which n 35 ft. above mear ft. at Manhole B a	naintains groundwat n sea level. Therefo







SCALE:	DRAWN BY: JRH	DATE: 12-9-2021
0.5 IN = 40 FT.	CHKD. BY: ABC	DATE: 12-15-2021

GROUNDWATER CONTOUR MAP PIEZOMETER/MANHOLE LEVELS SAMPLING EVENT MARCH 17, 2021

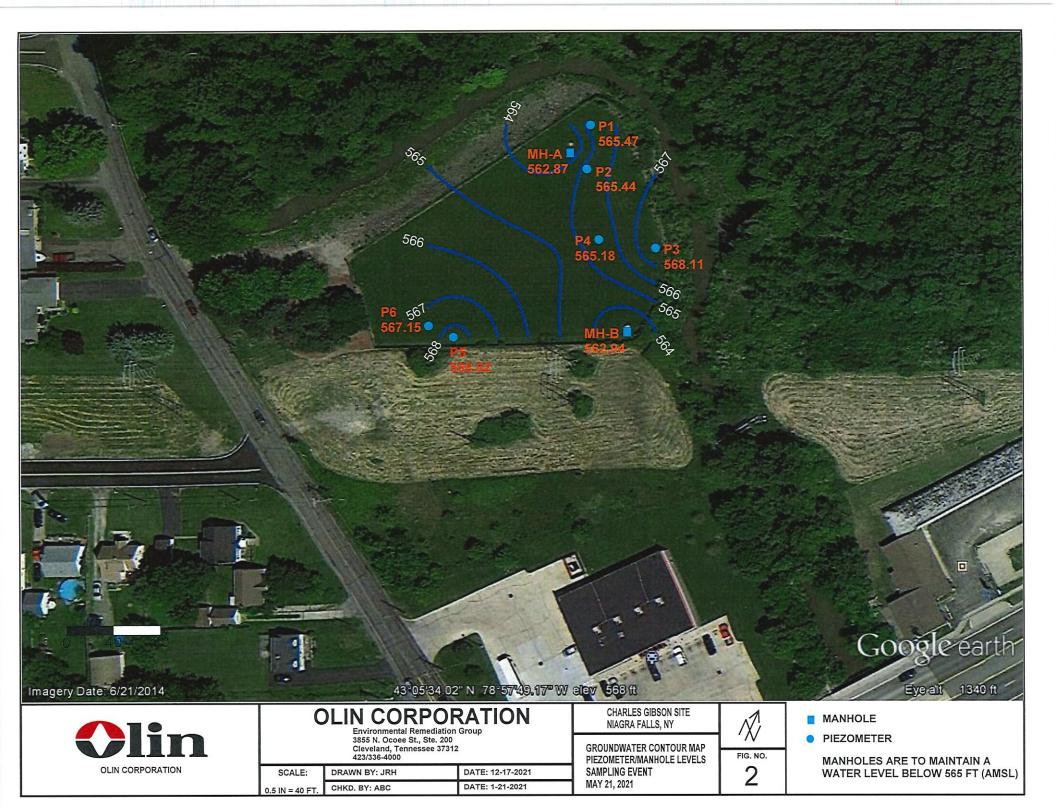


PIEZOMETER

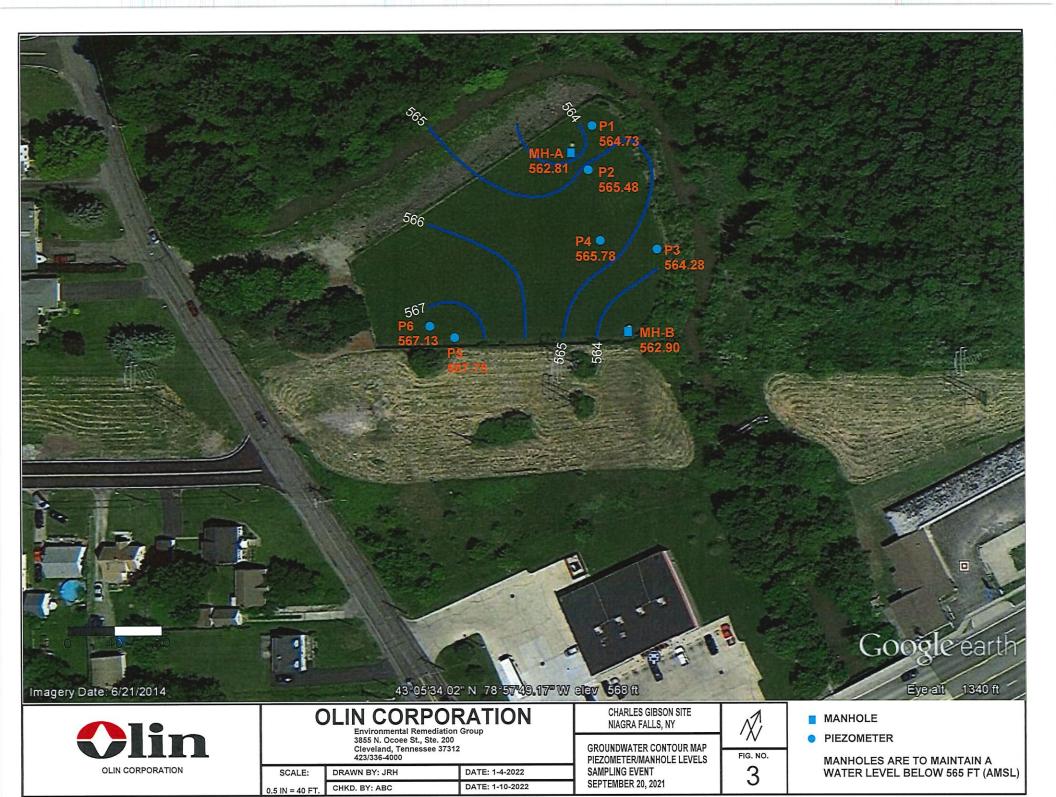
MANHOLES ARE TO MAINTAIN A WATER LEVEL BELOW 565 FT (AMSL)

	JSED FOR ALL QUAR I MEASURING EVENT		OMETER .	AND MANHOLE C	ROUND-	
DATE: <u>5/12</u> /	/21	_TIME:	0845			
INSPECTOR: Make	well Liffiton	_COMPANY	: Seven	son		
WEATHER: SUNNY	50°F					
PIEZOMETER	RISER ELEVATION (INSIDE CASING)	DEPTH TO (FT.)	WATER	WATER ELEVATION	COMMENTS	Total Pz Depth to Bottom (Ft)
P-1	572.72	7.25		565.47		14.52
P-2	574.89	9.45		565.44		15.03
P-3	574.16	6.05		568.11	<u> </u>	14.62
P-4	576.14	10.96		565.18	 -	16.91
P-5	575.05	6.43		568.62		14.06
P-6	578.28	11.13		567.15		18.15
MANHOLE A	575.22	12.35		562.87		17.85
MANHOLE B	577.34	1440		562.94		20.61
Niagara Tuscarora Ro in Manhole B (and by water distance from the (Note: riser elevations	pties into Manhole B by oad sanitary sewer line extension Manhole A) ne manhole rim should s (re)surveyed Septemb	by a float cor below an elev not be <u>less</u> th per, 1999 by \	ntrolled survation of 5 nan 12.41 Wendel Su	mp pump which m 65 ft. above mean ft. at Manhole B ar urveyors)	aintains groundwat sea level. Therefo nd 10.22 ft. at Manl	ter elevations ore, Depth to
	ENTS/OBSERVATION	s: All we	ell cover	s relabeled	l with	
black sharpie.	•					
			· · · · · · · · · · · · · · · · · · ·			

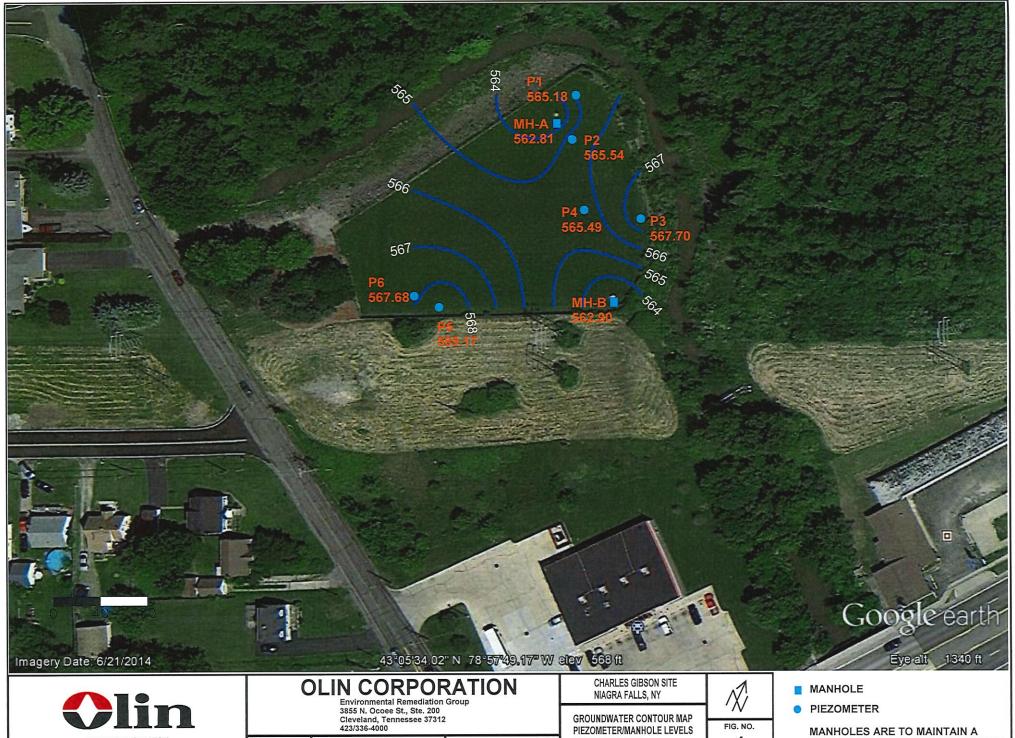
	· 					



DATE: $9-2$	0-21	-	:30			
NSPECTOR: M. W	ALKAC	_COMPANY: 5	GUEUSON	<u> </u>		
WEATHER: (1 WU)	176° F No	wind.				
PIEZOMETER	RISER ELEVATION (INSIDE CASING)	DEPTH TO WAT	ER WATER ELEVATION	COMMENTS		
P-1	572.72	7.99	564 73		\$10	
P-2	574.89	9.41	565.48			
P-3	574.16	9.88	564.28			
P-4	576.14	10.36	565.78	-		
P-5	575.05	7.30	567.75			
P-6	578.28	11.15	567.13			
MANHOLE A	575.22	12.41	562.8			20
MANHOLE B	577.34	14,44	562.90			140
Niagara Tuscarora Ro in Manhole B (and by water distance from th	ead sanitary sewer line extension Manhole A)	by a float controlled below an elevation not be <u>less</u> than 1	Manhole B is pumped a ed sump pump which m n of 565 ft. above mean 2.41 ft. at Manhole B a del Surveyors)	aintains groundwat sea level. Therefo	er elevations re, Depth to	
ADDITIONAL COMMI	ENTS/OBSERVATION	S: ALL PIEZO	DHETORS WERE	MS ASUNG A		
2x En bourse	1					



THIS FORM TO BE U WATER ELEVATION		TERLY PIEZOMETER : S	AND MANHOLE G	GROUND-	
DATE: <u>11-8-21</u>		TIME: <u>09</u> 60	-		
INSPECTOR: WALK	ER MIKE	COMPANY: 56U	EUSON		
WEATHER: Some	y 55°F				
PIEZOMETER	RISER ELEVATION (INSIDE CASING)	DEPTH TO WATER (FT.)	WATER ELEVATION	COMMENTS	
P-1	572.72	7.54	565.18		
P-2 ·	574.89	9.35	565.54	CRACKED WELL	CONST - (ORDAND)
P-3	574.16	6.46	567.70		Carty
P-4	576.14	10.65	565.49		
P-5	575.05	5.88	569.17		
P-6	578.28	10.60'	567.68		
MANHOLE A	575.22	12.41'	562.87		
MANHOLE B	577.34	14.44'	562.90		
Niagara Tuscarora Ro in Manhole B (and by water distance from th	ead sanitary sewer line extension Manhole A) he manhole rim should	y gravity feed and Manh by a float controlled sur below an elevation of 5 not be <u>less</u> than 12.41 ber, 1999 by Wendel Su	mp pump which m 65 ft. above mean ft. at Manhole B ar	aintains groundwate sea level. Therefo	er elevations re, Depth to
ADDITIONAL COMME	ENTS/OBSERVATION	S: THE SITE LOOK	GOOD, GARSS	cover 136"	
TALL NO EVIDE	ince of SETTLIA	s of Rodest	Dussons,	I fixed a	
couple of Bone	ds on the fence	that were con	my off.		
wall 8.2 has	SA CASCLED (ceven, I adone	ED A REPLAC	ement today.	
			Cher	hall	
*					



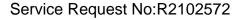


SCALE:	DRAWN BY: JRH	DATE: 1-4-2022
0.5 IN = 40 FT.	CHKD. BY: ABC	DATE: 1-10-2022

GROUNDWATER CONTOUR MAP PIEZOMETER/MANHOLE LEVELS SAMPLING EVENT NOVEMBER 8, 2021



MANHOLES ARE TO MAINTAIN A WATER LEVEL BELOW 565 FT (AMSL)





Adam Carringer
Olin Corporation
3855 North Ocoee Street
Suite 200
Cleveland, TN 37312

Laboratory Results for: Charles Gibson

Dear Adam,

Enclosed are the results of the sample(s) submitted to our laboratory March 19, 2021 For your reference, these analyses have been assigned our service request number **R2102572**.

All testing was performed according to our laboratory's quality assurance program and met the requirements of the TNI standards except as noted in the case narrative report. Any testing not included in the lab's accreditation is identified on a Non-Certified Analytes report. All results are intended to be considered in their entirety. ALS Environmental is not responsible for use of less than the complete report. Results apply only to the individual samples submitted to the lab for analysis, as listed in the report. The measurement uncertainty of the results included in this report is within that expected when using the prescribed method(s), and represented by Laboratory Control Sample control limits. Any events, such as QC failures or Holding Time exceedances, which may add to the uncertainty are explained in the report narrative or are flagged with qualifiers. The flags are explained in the Report Qualifiers and Definitions page of this report.

Please contact me if you have any questions. My extension is 7475. You may also contact me via email at Meghan.Pedro@alsglobal.com.

Respectfully submitted,

Mughour tedro

ALS Group USA, Corp. dba ALS Environmental

Meghan Pedro Project Manager

CC: Randy Morris



Narrative Documents

ALS Environmental—Rochester Laboratory 1565 Jefferson Road, Building 300, Suite 360, Rochester, NY 14623 Phone (585) 288-5380 Fax (585) 288-8475 www.alsglobal.com



Client:Olin CorporationService Request: R2102572Project:Charles GibsonDate Received: 03/19/2021

Sample Matrix: Water

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of ALS Environmental. This report contains analytical results for samples for the Tier level IV requested by the client.

Sample Receipt:

Six water samples were received for analysis at ALS Environmental on 03/19/2021. Any discrepancies upon initial sample inspection are annotated on the sample receipt and preservation form included within this report. The samples were stored at minimum in accordance with the analytical method requirements.

Semivoa GC:

Method 8081B, 03/24/2021: The upper control limit was exceeded for one or more analytes in the Continuing Calibration Verification (CCV). The field samples analyzed in this sequence did not contain the analyte(s) in question above the Method Reporting Limit (MRL). Since the exceedance equates to a potential high bias, the data quality was not significantly affected and no further corrective action was taken.

The RPD between the MS and the MSD was greater than the RPD limit. The percent recovery limit was met for both the MS and the MSD. Sample R2102572-003.

	Mighrou Pedro			
Approved by	\mathcal{O}	Date	03/29/2021	



SAMPLE DETECTION SUMMARY

CLIENT ID: MHB 031721	Lab ID: R2102572-005								
Analyte	Results	Flag	MDL	MRL	Units	Method			
beta-BHC	0.13	Р		0.054	ug/L	8081B			



Sample Receipt Information

ALS Environmental—Rochester Laboratory 1565 Jefferson Road, Building 300, Suite 360, Rochester, NY 14623 Phone (585) 288-5380 Fax (585) 288-8475 www.alsglobal.com Client: Olin Corporation Service Request:R2102572

Project: Charles Gibson/1259

SAMPLE CROSS-REFERENCE

SAMPLE #	CLIENT SAMPLE ID	<u>DATE</u>	<u>TIME</u>
R2102572-001	Field Blank 031721	3/17/2021	0947
R2102572-002	MW5 031721	3/17/2021	1000
R2102572-003	MW4 031721	3/17/2021	0900
R2102572-004	MW7 031721	3/17/2021	1030
R2102572-005	MHB 031721	3/17/2021	0910
R2102572-006	MWA3 031721	3/17/2021	1120

Printed 3/29/2021 12:00:31 PM Sample Summary



CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

002999

1565 Jefferson Road, Building 300, Suite 360 • Rochester, NY 14623 | +1 585 288 5380 +1 585 288 8475 (fax) PAGE __/__OF___/

Project Name Charles Gibson Project Number 1289 Project Manager Adam Carringer Company/Address						ANALYSIS REQUESTED (Include Method Number and Container Preservative)																	
Project Manager Adam Carringer	Report Co Robon Carringer			PRE	SERVAT	TIVE				O													
Company/Address Olin Colp					S.		$\overline{}$				$\overline{}$	$\overline{}$	$\overline{}$	$\overline{}$			$^{\prime}$			$\overline{}$	$\overline{}$	Preserva 0. NON 1. HCL	tive Key
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MW4 031821		03/18/21	0900		2				2														
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SPECIAL INSTRUCTIONS/COMMENTS Metals* Shipped in	one co-	dev					TU			REQU			_	_ I. Res	ORT R		EMEN	TS		INV	OICE I	NFORMA	TION
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STATE WHERE SAMPLES WERE COLLECTED													Eds	ta	Yes		_No						
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Cooler Receipt and Preservation Check Form

R2102572 5
Oils Corporation Charles Glason

Project/Clie	ent Me	•			Folder	Nun	nber				!!!				
•	ed on 3/1	9/21	by:					ALS	(TES)	FEDEX	VEL	OCIT	Y CLI	- ENT	
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2 Custody	papers proper	ly completed (in	k, signe	xd)? (([N Q	5b	Did V	OA vial	ls, Alk,c	or Sulfide	have si	g* bul 	obles?		N (N)
3 Did all b	ottles arrive in	good condition (unbrok	en)? (N (Y	6	Where	did the	bottles	originat	e?	ALS	/RÒC)	CL	IENT
4 Circle: Wet Ice Dry Ice Gel packs present? Y N 7 Soil VOA received as: Bulk Encore 5035set NA															
. Temperatu	re Readings	Date: 3/19/	21	Time	1116		ID:	IR#7	(R#I)	l .	From:	Pem	p Blank	Sa	mple Bottle
Observed To	emp (°C)	1.2.												.	
Within 0-6°	C?	(Y) N		Y	N _	Y	N_	Y	N		N	Y	N		Y N
If <0°C, we	re samples froz	en? Y N		Y	N	Y	N	Y	N	<u>Y</u> ^	N	<u>Y</u>	_N		Y N
If out of 1	Temperature,	note packing/ic	e condi	ition:			Ice melt	ed P	oorly P	acked (d	escribed	below	')	Same	Day Rule
		un Samples:				oval	Client	aware a	at drop-	off Cl	ient noti	fied by	/:		•
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SUSS sampi	es piaced in si	orage location:		— '			"	_ *** -		wiumi 4	o nours	JI Sail	pinig,		
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Cooler Br	eakdown/Prese	rvation Check**	: Date	:	MILL		_Time:_	1400			NO NO	_	<u>.</u>		
9.	Were all bottle	labels complete ((<i>i.e</i> . ana	ılysis,	preservation	on, etc	c.)?		Q	<u>es</u>	MD.	In	rai-		
	Did all bottle la	bels and tags agr ontainers used for	ee with	custo	ody papers:	_	•		SA G	霞	NO	3/	रना स्		
		s acceptable (no				ን?			Y	ES	NO			QN/A	
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pH	Lot of test	Reagent	Preser		Lot Rece			Exp	Samp	le ID	Vol.	1	ot Add	ed	Final
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≥12		NaOH						<u> </u>							
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HPROD	BULK
HTR	FLDT
SUB	HGFB
ALS	LL3541

Labels secondary reviewed by:_	an	
PC Secondary Review:		W



Miscellaneous Forms

ALS Environmental—Rochester Laboratory 1565 Jefferson Road, Building 300, Suite 360, Rochester, NY 14623 Phone (585) 288-5380 Fax (585) 288-8475 www.alsglobal.com



REPORT QUALIFIERS AND DEFINITIONS

- U Analyte was analyzed for but not detected. The sample quantitation limit has been corrected for dilution and for percent moisture, unless otherwise noted in the case narrative.
- J Estimated value due to either being a Tentatively Identified Compound (TIC) or that the concentration is between the MRL and the MDL. Concentrations are not verified within the linear range of the calibration. For DoD: concentration >40% difference between two GC columns (pesticides/Arclors).
- B Analyte was also detected in the associated method blank at a concentration that may have contributed to the sample result.
- E Inorganics- Concentration is estimated due to the serial dilution was outside control limits.
- E Organics- Concentration has exceeded the calibration range for that specific analysis.
- D Concentration is a result of a dilution, typically a secondary analysis of the sample due to exceeding the calibration range or that a surrogate has been diluted out of the sample and cannot be assessed.
- * Indicates that a quality control parameter has exceeded laboratory limits. Under the õNotesö column of the Form I, this qualifier denotes analysis was performed out of Holding Time.
- H Analysis was performed out of hold time for tests that have an õimmediateö hold time criteria.
- # Spike was diluted out.

- + Correlation coefficient for MSA is <0.995.
- N Inorganics- Matrix spike recovery was outside laboratory limits.
- N Organics- Presumptive evidence of a compound (reported as a TIC) based on the MS library search.
- S Concentration has been determined using Method of Standard Additions (MSA).
- W Post-Digestion Spike recovery is outside control limits and the sample absorbance is <50% of the spike absorbance.
- P Concentration >40% difference between the two GC columns.
- C Confirmed by GC/MS
- Q DoD reports: indicates a pesticide/Aroclor is not confirmed (×100% Difference between two GC columns).
- X See Case Narrative for discussion.
- MRL Method Reporting Limit. Also known as:
- LOQ Limit of Quantitation (LOQ)

 The lowest concentration at which the method analyte may be reliably quantified under the method conditions.
- MDL Method Detection Limit. A statistical value derived from a study designed to provide the lowest concentration that will be detected 99% of the time. Values between the MDL and MRL are estimated (see J qualifier).
- LOD Limit of Detection. A value at or above the MDL which has been verified to be detectable.
- ND Non-Detect. Analyte was not detected at the concentration listed. Same as U qualifier.



Rochester Lab ID # for State Certifications¹

Connecticut ID # PH0556	Maine ID #NY0032	Pennsylvania ID# 68-786
Delaware Approved	New Hampshire ID # 2941	Rhode Island ID # 158
DoD ELAP #65817	New York ID # 10145	Virginia #460167
Florida ID # E87674	North Carolina #676	

¹ Analyses were performed according to our laboratory

NELAP-approved quality assurance program and any applicable state or agency requirements. The test results meet requirements of the current NELAP/TNI standards or state or agency requirements, where applicable, except as noted in the case narrative. Since not all analyte/method/matrix combinations are offered for state/NELAC accreditation, this report may contain results which are not accredited. For a specific list of accredited analytes, contact the laboratory or go to https://www.alsglobal.com/locations/americas/north-america/usa/new-york/rochester-environmental

ALS Laboratory Group

Acronyms

ASTM American Society for Testing and Materials

A2LA American Association for Laboratory Accreditation

CARB California Air Resources Board

CAS Number Chemical Abstract Service registry Number

CFC Chlorofluorocarbon CFU Colony-Forming Unit

DEC Department of Environmental Conservation

DEQ Department of Environmental Quality

DHS Department of Health Services

DOE Department of Ecology DOH Department of Health

EPA U. S. Environmental Protection Agency

ELAP Environmental Laboratory Accreditation Program

GC Gas Chromatography

GC/MS Gas Chromatography/Mass Spectrometry

LUFT Leaking Underground Fuel Tank

M Modified

MCL Maximum Contaminant Level is the highest permissible concentration of a

substance allowed in drinking water as established by the USEPA.

MDL Method Detection Limit
MPN Most Probable Number
MRL Method Reporting Limit

NA Not Applicable NC Not Calculated

NCASI National Council of the Paper Industry for Air and Stream Improvement

ND Not Detected

NIOSH National Institute for Occupational Safety and Health

PQL Practical Quantitation Limit

RCRA Resource Conservation and Recovery Act

SIM Selected Ion Monitoring

TPH Total Petroleum Hydrocarbons

tr Trace level is the concentration of an analyte that is less than the PQL but

greater than or equal to the MDL.

ALS Group USA, Corp. dba ALS Environmental

Analyst Summary report

Client: Olin Corporation

Project: Charles Gibson/1259

Sample Name: Field Blank 031721

Lab Code: R2102572-001 **Sample Matrix:** Water

Date Collected: 03/17/21 **Date Received:** 03/19/21

Service Request: R2102572

Analysis Method

8081B

Sample Name: MW5 031721 Lab Code: R2102572-002

Sample Matrix: Water

Analyzed By Extracted/Digested By

Date Collected: 03/17/21

Date Received: 03/19/21

AFELSER

Analysis Method

8081B

Extracted/Digested By

KSERCU

KSERCU

Analyzed By

AFELSER

Sample Name: MW4 031721 Lab Code:

Sample Matrix:

R2102572-003

Water

Date Collected: 03/17/21

Date Received: 03/19/21

Analysis Method

8081B

Extracted/Digested By

KSERCU

KSERCU

Analyzed By

AFELSER

Sample Name:

Lab Code:

MW7 031721 R2102572-004

Sample Matrix:

Water

Date Collected: 03/17/21 **Date Received:** 03/19/21

Analysis Method

8081B

Extracted/Digested By

AFELSER

Analyzed By

Sample Name:

Lab Code:

MHB 031721 R2102572-005

Sample Matrix: Water **Date Collected:** 03/17/21

Date Received: 03/19/21

Analysis Method

8081B

Extracted/Digested By

AFELSER

KSERCU

Superset Reference:21-0000583959 rev 00

Analyzed By

Printed 3/29/2021 12:00:44 PM

ALS Group USA, Corp. dba ALS Environmental

Analyst Summary report

Client: Olin Corporation Service Request: R2102572

Project: Charles Gibson/1259

Sample Name: MWA3 031721 Date Collected: 03/17/21

Lab Code: R2102572-006 **Date Received:** 03/19/21

Sample Matrix: Water

Analysis Method Extracted/Digested By Analyzed By

8081B KSERCU AFELSER



INORGANIC PREPARATION METHODS

The preparation methods associated with this report are found in these tables unless discussed in the case narrative.

Water/Liquid Matrix

Analytical Method	Preparation Method
200.7	200.2
200.8	200.2
6010C	3005A/3010A
6020A	ILM05.3
9034 Sulfide Acid Soluble	9030B
SM 4500-CN-E Residual Cyanide	SM 4500-CN-G
SM 4500-CN-E WAD Cyanide	SM 4500-CN-I

Solid/Soil/Non-Aqueous Matrix

Analytical Method	Preparation			
	Method			
6010C	3050B			
6020A	3050B			
6010C TCLP (1311)	3005A/3010A			
extract				
6010 SPLP (1312) extract	3005A/3010A			
7199	3060A			
300.0 Anions/ 350.1/	DI extraction			
353.2/ SM 2320B/ SM				
5210B/ 9056A Anions				
,				
For analytical methods not listed, the preparation method is the same as the analytical method				



Sample Results



Semivolatile Organic Compounds by GC

Analytical Report

Client: Olin Corporation Service Request: R2102572

Project: Charles Gibson/1259 Date Collected: 03/17/21 09:47

Sample Matrix: Water Date Received: 03/19/21 10:15

 Sample Name:
 Field Blank 031721
 Units: ug/L

 Lab Code:
 R2102572-001
 Basis: NA

Organochlorine Pesticides by Gas Chromatography

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
alpha-BHC	ND U	0.045	1	03/24/21 18:45	3/23/21	_
beta-BHC	ND U	0.045	1	03/24/21 18:45	3/23/21	
delta-BHC	ND U	0.045	1	03/24/21 18:45	3/23/21	
gamma-BHC (Lindane)	ND U	0.045	1	03/24/21 18:45	3/23/21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q	
Decachlorobiphenyl	28	10 - 164	03/24/21 18:45		
Tetrachloro-m-xylene	35	10 - 147	03/24/21 18:45		

Analytical Report

Client: Olin Corporation Service Request: R2102572 **Date Collected:** 03/17/21 10:00

Project: Charles Gibson/1259

Sample Matrix: Water **Date Received:** 03/19/21 10:15

Sample Name: MW5 031721 Units: ug/L Lab Code: R2102572-002 Basis: NA

Organochlorine Pesticides by Gas Chromatography

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
alpha-BHC	ND U	0.050	1	03/24/21 19:04	3/23/21	_
beta-BHC	ND U	0.050	1	03/24/21 19:04	3/23/21	
delta-BHC	ND U	0.050	1	03/24/21 19:04	3/23/21	
gamma-BHC (Lindane)	ND U	0.050	1	03/24/21 19:04	3/23/21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q	
Decachlorobiphenyl	36	10 - 164	03/24/21 19:04		
Tetrachloro-m-xylene	53	10 - 147	03/24/21 19:04		

Analytical Report

Client:Olin CorporationService Request:R2102572Project:Charles Gibson/1259Date Collected:03/17/21 09:00

Sample Matrix: Water Date Received: 03/19/21 10:15

ample Matrix: Water Date Received: 03/19/21 10:13

 Sample Name:
 MW4 031721
 Units: ug/L

 Lab Code:
 R2102572-003
 Basis: NA

Organochlorine Pesticides by Gas Chromatography

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
alpha-BHC	ND U	0.045	1	03/24/21 19:23	3/23/21	_
beta-BHC	ND U	0.045	1	03/24/21 19:23	3/23/21	
delta-BHC	ND U	0.045	1	03/24/21 19:23	3/23/21	
gamma-BHC (Lindane)	ND U	0.045	1	03/24/21 19:23	3/23/21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q	
Decachlorobiphenyl	41	10 - 164	03/24/21 19:23		
Tetrachloro-m-xylene	65	10 - 147	03/24/21 19:23		

Analytical Report

Client:Olin CorporationService Request:R2102572Project:Charles Gibson/1259Date Collected:03/17/21 10:30

Sample Matrix: Water Date Received: 03/19/21 10:15

 Sample Name:
 MW7 031721
 Units: ug/L

 Lab Code:
 R2102572-004
 Basis: NA

Organochlorine Pesticides by Gas Chromatography

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
alpha-BHC	ND U	0.045	1	03/24/21 20:20	3/23/21	_
beta-BHC	ND U	0.045	1	03/24/21 20:20	3/23/21	
delta-BHC	ND U	0.045	1	03/24/21 20:20	3/23/21	
gamma-BHC (Lindane)	ND U	0.045	1	03/24/21 20:20	3/23/21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q	
Decachlorobiphenyl	31	10 - 164	03/24/21 20:20		
Tetrachloro-m-xylene	47	10 - 147	03/24/21 20:20		

Analytical Report

Client:Olin CorporationService Request:R2102572Project:Charles Gibson/1259Date Collected:03/17/21 09:10

Sample Matrix: Water Date Received: 03/19/21 10:15

 Sample Name:
 MHB 031721
 Units: ug/L

 Lab Code:
 R2102572-005
 Basis: NA

Organochlorine Pesticides by Gas Chromatography

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
alpha-BHC	ND U	0.054	1	03/24/21 20:39	3/23/21	
beta-BHC	0.13 P	0.054	1	03/24/21 20:39	3/23/21	
delta-BHC	ND U	0.054	1	03/24/21 20:39	3/23/21	
gamma-BHC (Lindane)	ND U	0.054	1	03/24/21 20:39	3/23/21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q	
Decachlorobiphenyl	52	10 - 164	03/24/21 20:39		
Tetrachloro-m-xylene	56	10 - 147	03/24/21 20:39		

Analytical Report

Client:Olin CorporationService Request:R2102572Project:Charles Gibson/1259Date Collected:03/17/21 11:20

Sample Matrix: Water Date Received: 03/19/21 10:15

 Sample Name:
 MWA3 031721
 Units: ug/L

 Lab Code:
 R2102572-006
 Basis: NA

Organochlorine Pesticides by Gas Chromatography

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
alpha-BHC	ND U	0.049	1	03/24/21 21:17	3/23/21	_
beta-BHC	ND U	0.049	1	03/24/21 21:17	3/23/21	
delta-BHC	ND U	0.049	1	03/24/21 21:17	3/23/21	
gamma-BHC (Lindane)	ND U	0.049	1	03/24/21 21:17	3/23/21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q	
Decachlorobiphenyl	63	10 - 164	03/24/21 21:17		
Tetrachloro-m-xylene	57	10 - 147	03/24/21 21:17		



QC Summary Forms



Semivolatile Organic Compounds by GC

QA/QC Report

Client: Olin Corporation Service Request: R2102572

Project: Charles Gibson/1259

Sample Matrix: Water

SURROGATE RECOVERY SUMMARY

Organochlorine Pesticides by Gas Chromatography

Analysis Method: 8081B **Extraction Method:** EPA 3510C

		Decachlorobiphenyl	Tetrachloro-m-xylene	
Sample Name	Lab Code	10-164	10-147	
Field Blank 031721	R2102572-001	28	35	
MW5 031721	R2102572-002	36	53	
MW4 031721	R2102572-003	41	65	
MW7 031721	R2102572-004	31	47	
MHB 031721	R2102572-005	52	56	
MWA3 031721	R2102572-006	63	57	
Method Blank	RQ2102947-05	60	57	
Lab Control Sample	RQ2102947-06	63	58	
Duplicate Lab Control Sample	RQ2102947-07	63	58	
MW4 031721 MS	RQ2102947-01	23	54	
MW4 031721 DMS	RQ2102947-02	40	65	

QA/QC Report

Client: Olin Corporation **Service Request:** R2102572 **Project:** Charles Gibson/1259 **Date Collected:** 03/17/21 **Sample Matrix:** Water **Date Received:** 03/19/21 Date Analyzed: 03/24/21 **Date Extracted:** 03/23/21

Duplicate Matrix Spike Summary
Organochlorine Pesticides by Gas Chromatography

 Sample Name:
 MW4 031721
 Units:
 ug/L

 Lab Code:
 R2102572-003
 Basis:
 NA

Analysis Method: 8081B **Prep Method:** EPA 3510C

Matrix Spike
RQ2102947-01
RQ2102947-02

	Sample		Spike			Spike		% Rec		RPD
Analyte Name	Result	Result	Amount	% Rec	Result	Amount	% Rec	Limits	RPD	Limit
alpha-BHC	ND U	0.268	0.364	74	0.354	0.392	90	27-154	28	30
beta-BHC	ND U	0.254	0.364	70	0.364	0.392	93	32-184	36*	30
delta-BHC	ND U	0.259	0.364	71	0.375	0.392	96	10-182	37*	30
gamma-BHC (Lindane)	ND U	0.292	0.364	80	0.351	0.392	90	43-164	18	30

Results flagged with an asterisk (*) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

Matrix Spike and Matrix Spike Duplicate Data is presented for information purposes only. The matrix may or may not be relevant to samples reported in this report. The laboratory evaluates system performance based on the LCS and LCSD control limits.

Printed 3/29/2021 12:00:46 PM

Analytical Report

Client: Olin Corporation Service Request: R2102572

Project:Charles Gibson/1259Date Collected:NASample Matrix:WaterDate Received:NA

 Sample Name:
 Method Blank
 Units: ug/L

 Lab Code:
 RQ2102947-05
 Basis: NA

Organochlorine Pesticides by Gas Chromatography

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
alpha-BHC	ND U	0.050	1	03/24/21 17:49	3/23/21	_
beta-BHC	ND U	0.050	1	03/24/21 17:49	3/23/21	
delta-BHC	ND U	0.050	1	03/24/21 17:49	3/23/21	
gamma-BHC (Lindane)	ND U	0.050	1	03/24/21 17:49	3/23/21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q	
Decachlorobiphenyl	60	10 - 164	03/24/21 17:49		
Tetrachloro-m-xylene	57	10 - 147	03/24/21 17:49		

QA/QC Report

Client: Olin Corporation
Project: Charles Gibson/1259

Sample Matrix: Water

Service Request: R2102572

Date Analyzed: 03/24/21

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Duplicate Lab Control Sample Summary
Organochlorine Pesticides by Gas Chromatography

Units:ug/L Basis:NA

Lab Control Sample

Duplicate Lab Control Sample

RQ2102947-06

RQ2102947-07

	Analytical		Spike			Spike		% Rec		RPD
Analyte Name	Method	Result	Amount	% Rec	Result	Amount	% Rec	Limits	RPD	Limit
alpha-BHC	8081B	0.293	0.400	73	0.281	0.400	70	36-151	4	30
beta-BHC	8081B	0.300	0.400	75	0.288	0.400	72	55-149	4	30
delta-BHC	8081B	0.306	0.400	76	0.295	0.400	74	29-159	4	30
gamma-BHC (Lindane)	8081B	0.295	0.400	74	0.282	0.400	70	41-149	4	30

Data Evaluation Narrative Charles Gibson – March 2021 Groundwater and Leachate Sampling Event

SDG: R2102572 - ALS Environmental, Rochester, NY

Deliverables

The data package as submitted to Olin Corporation is complete as stipulated under the Quality Assurance Project Plan (QAPP) for the site. United States Environmental Protection Agency (USEPA) Method 8081B was utilized in laboratory testing of samples.

Sample Integrity

Samples within this sample delivery group (SDG) were submitted to the ALS Environmental Laboratory in Rochester, NY for chlorinated pesticides analysis. The sample cooler temperature measured 1.6°C upon arrival at the laboratory. The specified temperature limit is $4^{\circ}\text{C} \pm 2^{\circ}\text{C}$. The proper bottles were used, the Chain of Custody was properly relinquished, and the correct analytical method was employed.

Sample Identification

This SDG contains the following water and quality control (QC) samples collected March 17, 2021:

SDG R2102572:

Sample ID	Sample ID	Sample ID	Sample ID	Sample ID	Sample ID
Field Blank 031721	MW5 031721	MW4 031721	MW7 031721*	MHB 031721	MWA3 031721

^{*} Blind Field Duplicate of MW5 031721.

Chlorinated Pesticides (8081B)

The samples in this SDG were submitted for site-specific chlorinated pesticides (BHCs) analysis by USEPA Method 8081B.

Holding Times:

The extraction and analytical logs indicate that applicable holding times were met for samples submitted for chlorinated pesticide analysis.

Practical Quantitation Limits:

The practical quantitation limits (PQLs) were met for all samples submitted for chlorinated pesticide analysis by USEPA Method 8081B.

Calibration:

The initial and continuing calibration data for this SDG indicates that the applicable calibration criteria were met. The column breakdowns were assessed, and the percent degradation was within QC limits.

Surrogates:

The surrogate recoveries were within applicable QC advisory limits for all samples submitted for chlorinated pesticide analysis.

Blank Summary:

The analytical results of the laboratory method blank and field blank indicate that chlorinated pesticides were not detected.

Laboratory Control Sample (LCS) and LCS Duplicate (LCSD):

The LCS/LCSD spike recoveries and relative percent differences (RPDs) were within applicable QC advisory limits.

Second Column Confirmation:

The laboratory utilized a second column confirmation for the analysis of chlorinated pesticides. The RPDs were within guidelines for all project and quality control samples except for beta-BHC in sample MHB 031721; the RPD was 51. The beta-BHC detection in MHB 031721 was therefore qualified as an estimated detection (J) by professional judgment.

Performance Evaluation Sample (PES):

The results from the PES were within quality control guidelines.

Field Duplicate Sample:

According to the sampler, MW7 031721 was a blind field duplicate of MW5 031721. The sample and field duplicate were non-detect for all BHC compounds.

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

MS/MSD analyses were performed on groundwater sample MW4 031721. All percent recoveries were within control guidelines for both the MS and MSD. The relative percent difference (RPD) between the MS and MSD results was slightly above the laboratory control limit of 30 for beta- and delta-BHC. No data qualification was deemed necessary by professional judgment.

Overall Site Evaluation and Professional Judgment Flagging Changes

The data within this SDG were compared to site data and an edit to the DQE flags was required based on professional judgment. Monitoring period completeness, which is the percentage of analytical results judged valid, including estimated values, was 100 percent for the March 2021 sampling event. Typically, project objectives are met when completeness is 90 percent or better.

Prepared by: <u>Randy T. Morris</u> Date <u>March 31, 2021</u>



Service Request No:R2109751

Adam Carringer Olin Corporation 490 Stuart Road Cleveland, TN 37312

Laboratory Results for: Olin Charles Gibson Site

Dear Adam,

Enclosed are the results of the sample(s) submitted to our laboratory September 21, 2021 For your reference, these analyses have been assigned our service request number **R2109751**.

All testing was performed according to our laboratory's quality assurance program and met the requirements of the TNI standards except as noted in the case narrative report. Any testing not included in the lab's accreditation is identified on a Non-Certified Analytes report. All results are intended to be considered in their entirety. ALS Environmental is not responsible for use of less than the complete report. Results apply only to the individual samples submitted to the lab for analysis, as listed in the report. The measurement uncertainty of the results included in this report is within that expected when using the prescribed method(s), and represented by Laboratory Control Sample control limits. Any events, such as QC failures or Holding Time exceedances, which may add to the uncertainty are explained in the report narrative or are flagged with qualifiers. The flags are explained in the Report Qualifiers and Definitions page of this report.

Please contact me if you have any questions. My extension is 7475. You may also contact me via email at Meghan.Pedro@alsglobal.com.

Respectfully submitted,

ALS Group USA, Corp. dba ALS Environmental

Meghan Pedro Project Manager

CC: Randy Morris



Narrative Documents



Client:Olin CorporationService Request: R2109751Project:Olin Charles Gibson SiteDate Received: 09/21/2021

Sample Matrix: Soil

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of ALS Environmental. This report contains analytical results for samples for the Tier II level requested by the client.

Sample Receipt:

Two soil samples were received for analysis at ALS Environmental on 09/21/2021. Any discrepancies upon initial sample inspection are annotated on the sample receipt and preservation form included within this report. The samples were stored at minimum in accordance with the analytical method requirements.

Semivoa GC:

Method 8081B, 09/27/2021: The upper control limit was exceeded for one or more analytes in the Continuing Calibration Verification (CCV). The field samples analyzed in this sequence did not contain the analyte(s) in question above the Method Reporting Limit (MRL). Since the exceedance equates to a potential high bias, the data quality was not significantly affected and no further corrective action was taken.

Method 8081B, 740349: The reporting limit is elevated for one or more analytes. The sample extract was diluted prior to instrumental analysis due to relatively high levels of non-target background components. The extract was highly colored and viscous, which indicated the need to perform a dilution prior to injection into the instrument. Clean-up of the extract was performed within the scope of the method, but did not eliminate enough of the background components to prevent dilution. The result(s) are flagged to indicate the matrix interference.

General Chemistry:

No significant anomalies were noted with this analysis.

	Michael Pedio		
Approved by	<u> </u>	Date	10/01/2021



SAMPLE DETECTION SUMMARY

CLIENT ID: US-1-092021	92021 Lab ID: R2109751-001										
Analyte	Results	Flag	MDL	MRL	Units	Method					
Total Solids	27.2				Percent	ALS SOP					
CLIENT ID: MS-1-092021	Lab ID: R2109751-002										
Analyte	Results	Flag	MDL	MRL	Units	Method					
Total Solids	27.8				Percent	ALS SOP					



Sample Receipt Information

Client: Olin Corporation Service Request:R2109751

Project: Olin Charles Gibson Site/1259

SAMPLE CROSS-REFERENCE

SAMPLE #	CLIENT SAMPLE ID	DATE	<u>TIME</u>
R2109751-001	US-1-092021	9/20/2021	1430
R2109751-002	MS-1-092021	9/20/2021	1445



CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

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Page 7 of 28

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Distribution: White - Lab Copy; Yellow - Return to Originator

CHAIN OF CUSTODY/LABORATORY ANALYSIS REQUEST FORM

061202

1565 Jefferson Road, Building 300, Suite 360 • Rochester, NY 14623 | +1 585 288 5380 +1 585 288 8475 (fax) PAGE Project Number ANALYSIS REQUESTED (Include Method Number and Container Preservative) OLIN CHAZERS GIRSON SITE Project Manager PRESERVATIVE HOME CALLES Company/Address Preservative Key 0. NONE OLIN CORP. - Capponet En Renedation Group CONTAINERS HCL 2. HNO₃ water 490 Stuart Rd H2SŎ₄ NaOH 5. Zn. Acetate CLEUZLAND, TN 37312 6. MeOH NUMBER OF 7. NaHSO4 8. Other ABCARLINGER @ OLIN. COM REMARKS/ MICHAEL WALKER ALTERNATE DESCRIPTION SAMPLING FOR OFFICE USE ONLY LAB ID **CLIENT SAMPLE ID** DATE TIME MATRIX 9-20-21 14 30 15-1-092021 SED 9-20-21 1445 Sen 9770.11 SPECIAL INSTRUCTIONS/COMMENTS REPORT REQUIREMENTS INVOICE INFORMATION **TURNAROUND REQUIREMENTS** No DS-1-09 2021 was taken Due to LACK of MARANIOI in Serment trap. **RUSH (SURCHARGES APPLY)** 1. Results Only II. Results + QC Summaries PQ# 1 day _____2 day _____3 day (LCS, DUP, MS/MSD as required) BILL TO: Standard (10 business days-No Surcharge) III. Results + QC and Calibration our cons Summarios REQUESTED REPORT DATE IV. Data Validation Report with Raw Data See QAPP STATE WHERE SAMPLES WERE COLLECTED Edata ____Yes ____No Night Yeak RECEIVED BY RELINQUISHED BY RECEIVED BY RELINQUISHED BY RECEIVED BY RELINQUISHED BY Signature Signature Signature Signature Signature Printed Name Printed Name Printed Name Printed Name Firm Date/Time Date/Time Date/Time Date/Time Date/Time

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Tike
(ALS)

Cooler Receipt and Preservation Check Form

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Olin Charles Gibson Site	

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	HPROD	BULK
	HTR	FLDT
	SUB	HGFB
2	N N	LL3541

Labels secondary reviewed by:	<u> </u>
PC Secondary Review:	

*significant air bubbles: VOA > 5-6 mm : WC >1 in. diameter



Miscellaneous Forms



REPORT QUALIFIERS AND DEFINITIONS

- U Analyte was analyzed for but not detected. The sample quantitation limit has been corrected for dilution and for percent moisture, unless otherwise noted in the case narrative.
- Estimated value due to either being a Tentatively Identified Compound (TIC) or that the concentration is between the MRL and the MDL. Concentrations are not verified within the linear range of the calibration. For DoD: concentration >40% difference between two GC columns (pesticides/Arclors).
- Analyte was also detected in the associated method blank at a concentration that may have contributed to the sample result.
- Е Inorganics- Concentration is estimated due to the serial dilution was outside control limits.
- Organics- Concentration has exceeded the Е calibration range for that specific analysis.
- Concentration is a result of a dilution, D typically a secondary analysis of the sample due to exceeding the calibration range or that a surrogate has been diluted out of the sample and cannot be assessed.
- Indicates that a quality control parameter has exceeded laboratory limits. Under the "Notes" column of the Form I, this qualifier denotes analysis was performed out of Holding Time.
- Analysis was performed out of hold time for tests that have an "immediate" hold time criteria.
- # Spike was diluted out.

P:\INTRANET\QAQC\Forms Controlled\QUALIF_routine rev 6.doc

- + Correlation coefficient for MSA is <0.995.
- Ν Inorganics- Matrix spike recovery was outside laboratory limits.
- Organics- Presumptive evidence of a compound Ν (reported as a TIC) based on the MS library search.
- S Concentration has been determined using Method of Standard Additions (MSA).
- W Post-Digestion Spike recovery is outside control limits and the sample absorbance is <50% of the spike absorbance.
- Concentration >40% difference between the two P GC columns.
- \mathbf{C} Confirmed by GC/MS
- Q DoD reports: indicates a pesticide/Aroclor is not confirmed (≥100% Difference between two GC columns).
- X See Case Narrative for discussion.
- MRL Method Reporting Limit. Also known as:
- LOQ Limit of Quantitation (LOQ) The lowest concentration at which the method analyte may be reliably quantified under the method conditions.
- MDL Method Detection Limit. A statistical value derived from a study designed to provide the lowest concentration that will be detected 99% of the time. Values between the MDL and MRL are estimated (see J qualifier).
- LOD Limit of Detection. A value at or above the MDL which has been verified to be detectable.
- ND Non-Detect. Analyte was not detected at the concentration listed. Same as U qualifier.

Rochester Lab ID # for State Accreditations¹



NELAP States	
Florida ID # E87674	
New Hampshire ID # 2941	
New York ID # 10145	
Pennsylvania ID# 68-786	
Virginia #460167	

Non-NELAP States
Connecticut ID #PH0556
Delaware Approved
Maine ID #NY01587
North Carolina #36701
North Carolina #676
Rhode Island LAO00333

Analyses were performed according to our laboratory's NELAP-approved quality assurance program and any applicable state or agency requirements. The test results meet requirements of the current NELAP/TNI standards or state or agency requirements, where applicable, except as noted in the case narrative. Since not all analyte/method/matrix combinations are offered for state/NELAC accreditation, this report may contain results which are not accredited. For a specific list of accredited analytes, contact the laboratory or go to https://www.alsglobal.com/locations/americas/north-america/usa/new-york/rochester-environmental

ALS Laboratory Group

Acronyms

ASTM American Society for Testing and Materials

A2LA American Association for Laboratory Accreditation

CARB California Air Resources Board

CAS Number Chemical Abstract Service registry Number

CFC Chlorofluorocarbon CFU Colony-Forming Unit

DEC Department of Environmental Conservation

DEQ Department of Environmental Quality

DHS Department of Health Services

DOE Department of Ecology DOH Department of Health

EPA U. S. Environmental Protection Agency

ELAP Environmental Laboratory Accreditation Program

GC Gas Chromatography

GC/MS Gas Chromatography/Mass Spectrometry

LUFT Leaking Underground Fuel Tank

M Modified

MCL Maximum Contaminant Level is the highest permissible concentration of a

substance allowed in drinking water as established by the USEPA.

MDL Method Detection Limit
MPN Most Probable Number
MRL Method Reporting Limit

NA Not Applicable NC Not Calculated

NCASI National Council of the Paper Industry for Air and Stream Improvement

ND Not Detected

NIOSH National Institute for Occupational Safety and Health

PQL Practical Quantitation Limit

RCRA Resource Conservation and Recovery Act

SIM Selected Ion Monitoring

TPH Total Petroleum Hydrocarbons

tr Trace level is the concentration of an analyte that is less than the PQL but

greater than or equal to the MDL.

Client: Olin Corporation Service Request: R2109751

Project: Olin Charles Gibson Site/1259

Non-Certified Analytes

Certifying Agency: New York Department of Health

MethodMatrixAnalyteALS SOPSoilTotal Solids

Analyst Summary report

Client: Olin Corporation

Project: Olin Charles Gibson Site/1259

Service Request: R2109751

Sample Name: US-1-092021 **Lab Code:** R2109751-001

Sample Matrix: Soil

Date Collected: 09/20/21

Date Received: 09/21/21

Analysis Method Extracted/Digested By Analyzed By

8081B KSERCU AMOSES
ALS SOP KAWONG

Sample Name: MS-1-092021 **Date Collected:** 09/20/21

Lab Code:R2109751-002Date Received: 09/21/21Sample Matrix:Soil

Analysis Method Extracted/Digested By Analyzed By

Analysis Method Extracted/Digested By Analyzed By
8081B KSERCU AMOSES

ALS SOP KAWONG



INORGANIC PREPARATION METHODS

The preparation methods associated with this report are found in these tables unless discussed in the case narrative.

Water/Liquid Matrix

	•
Analytical Method	Preparation Method
200.7	200.2
200.8	200.2
6010C	3005A/3010A
6020A	ILM05.3
9034 Sulfide Acid Soluble	9030B
SM 4500-CN-E Residual	SM 4500-CN-G
Cyanide	
SM 4500-CN-E WAD	SM 4500-CN-I
Cyanide	

Solid/Soil/Non-Aqueous Matrix

Analytical Method	Preparation
	Method
6010C	3050B
6020A	3050B
6010C TCLP (1311)	3005A/3010A
extract	
6010 SPLP (1312) extract	3005A/3010A
7199	3060A
300.0 Anions/ 350.1/	DI extraction
353.2/ SM 2320B/ SM	
5210B/ 9056A Anions	
For analytical methods not listed,	
method is the same as the analyti	cal method



Sample Results



Semivolatile Organic Compounds by GC

Analytical Report

Client: Olin Corporation Service Request: R2109751

Project: Olin Charles Gibson Site/1259 **Date Collected:** 09/20/21 14:30

Sample Matrix: Soil Date Received: 09/21/21 09:40

 Sample Name:
 US-1-092021
 Units: ug/Kg

 Lab Code:
 R2109751-001
 Basis: Dry

Organochlorine Pesticides by Gas Chromatography using Microwave Extraction

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
alpha-BHC	ND U	150	20	09/27/21 16:31	9/24/21	
beta-BHC	ND U	150	20	09/27/21 16:31	9/24/21	
delta-BHC	ND U	150	20	09/27/21 16:31	9/24/21	
gamma-BHC (Lindane)	ND U	150	20	09/27/21 16:31	9/24/21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
Decachlorobiphenyl	113	10 - 145	09/27/21 16:31	
Tetrachloro-m-xylene	102	10 - 123	09/27/21 16:31	

Analytical Report

Client: Olin Corporation Service Request: R2109751

Project: Olin Charles Gibson Site/1259 Date Collected: 09/20/21 14:45

Sample Matrix: Soil Date Received: 09/21/21 09:40

 Sample Name:
 MS-1-092021
 Units: ug/Kg

 Lab Code:
 R2109751-002
 Basis: Dry

Organochlorine Pesticides by Gas Chromatography using Microwave Extraction

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
alpha-BHC	ND U	160	10	09/27/21 16:51	9/24/21	
beta-BHC	ND U	160	10	09/27/21 16:51	9/24/21	
delta-BHC	ND U	160	10	09/27/21 16:51	9/24/21	
gamma-BHC (Lindane)	ND U	160	10	09/27/21 16:51	9/24/21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
Decachlorobiphenyl	84	10 - 145	09/27/21 16:51	
Tetrachloro-m-xylene	83	10 - 123	09/27/21 16:51	



General Chemistry

Analytical Report

Client: Olin Corporation

Project: Olin Charles Gibson Site/1259 Date Collected: 09/20/21 14:30

Sample Matrix: Soil Date Received: 09/21/21 09:40

Sample Name: US-1-092021 Basis: As Received

Lab Code: R2109751-001

Inorganic Parameters

Analysis
Analyte Name Method Result Units MRL Dil. Date Analyzed Q
Total Solids ALS SOP 27.2 Percent - 1 10/01/21 08:55

Service Request: R2109751

Analytical Report

Client: Olin Corporation

Project: Olin Charles Gibson Site/1259 Date Collected: 09/20/21 14:45

Sample Matrix: Soil Date Received: 09/21/21 09:40

Sample Name: MS-1-092021 Basis: As Received

Lab Code: R2109751-002

Inorganic Parameters

Analysis
Analyte Name Method Result Units MRL Dil. Date Analyzed Q
Total Solids ALS SOP 27.8 Percent - 1 10/01/21 08:55

Service Request: R2109751



QC Summary Forms



Semivolatile Organic Compounds by GC

QA/QC Report

Client: Olin Corporation Service Request: R2109751

Project: Olin Charles Gibson Site/1259

Sample Matrix: Soil

SURROGATE RECOVERY SUMMARY

Organochlorine Pesticides by Gas Chromatography using Microwave Extraction

Analysis Method: 8081B **Extraction Method:** EPA 3546

		Decachlorobiphenyl	Tetrachloro-m-xylene	
Sample Name	Lab Code	10-145	10-123	
US-1-092021	R2109751-001	113	102	
MS-1-092021	R2109751-002	84	83	
Method Blank	RQ2111875-04	82	51	
Lab Control Sample	RQ2111875-05	83	41	
Duplicate Lab Control Sample	RQ2111875-06	81	63	
MS-1-092021 MS	RQ2111875-07	76	81	
MS-1-092021 DMS	RQ2111875-08	76	92	

QA/QC Report

Client: Olin Corporation **Service Request:** R2109751 **Project:** Olin Charles Gibson Site/1259 **Date Collected:** 09/20/21 **Sample Matrix:** Soil **Date Received:** 09/21/21 Date Analyzed: 09/27/21

Date Extracted: 09/24/21

Duplicate Matrix Spike Summary

Organochlorine Pesticides by Gas Chromatography using Microwave Extraction

Sample Name: MS-1-092021 **Units:** ug/Kg Lab Code: R2109751-002 **Basis:** Dry

Analysis Method: 8081B **Prep Method:** EPA 3546

Duplicate Matrix Spike Matrix Spike RQ2111875-07 RQ2111875-08 Snike Snike % Rec

	Sample		Spike			Spike		% Rec		RPD
Analyte Name	Result	Result	Amount	% Rec	Result	Amount	% Rec	Limits	RPD	Limit
alpha-BHC	ND U	187 J	108	174 *	ND U	89.3	0 *	10-149	NC	30
beta-BHC	ND U	166 J	108	155	ND U	89.3	0 *	10-162	NC	30
delta-BHC	ND U	ND U	108	0 *	ND U	89.3	0 *	10-157	NC	30
gamma-BHC (Lindane)	ND U	ND U	108	0 *	ND U	89.3	0 *	10-170	NC	30

Results flagged with an asterisk (*) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

Matrix Spike and Matrix Spike Duplicate Data is presented for information purposes only. The matrix may or may not be relevant to samples reported in this report. The laboratory evaluates system performance based on the LCS and LCSD control limits.

Analytical Report

Client: Olin Corporation Service Request: R2109751

Project: Olin Charles Gibson Site/1259

Date Collected: NA

Sample Matrix: Soil Date Received: NA

 Sample Name:
 Method Blank
 Units: ug/Kg

 Lab Code:
 RQ2111875-04
 Basis: Dry

Organochlorine Pesticides by Gas Chromatography using Microwave Extraction

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
alpha-BHC	ND U	1.8	1	09/27/21 17:51	9/24/21	
beta-BHC	ND U	1.8	1	09/27/21 17:51	9/24/21	
delta-BHC	ND U	1.8	1	09/27/21 17:51	9/24/21	
gamma-BHC (Lindane)	ND U	1.8	1	09/27/21 17:51	9/24/21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
Decachlorobiphenyl	82	10 - 145	09/27/21 17:51	
Tetrachloro-m-xylene	51	10 - 123	09/27/21 17:51	

QA/QC Report

Client: Olin Corporation

Project: Olin Charles Gibson Site/1259 Date Analyzed: 09/27/21

Sample Matrix: Soil

Duplicate Lab Control Sample Summary Organochlorine Pesticides by Gas Chromatography using Microwave Extraction

Units:ug/Kg Basis:Dry

Service Request: R2109751

Lab Control Sample

Duplicate Lab Control Sample

RQ2111875-05

RQ2111875-06

Analyte Name	Analytical Method	Result	Spike Amount	% Rec	Result	Spike Amount	% Rec	% Rec Limits	RPD	RPD Limit
alpha-BHC	8081B	3.97	7.01	57	5.25	6.55	80	28-145	28	30
beta-BHC	8081B	5.56	7.01	79	6.00	6.55	92	38-144	8	30
delta-BHC	8081B	5.56	7.01	79	5.93	6.55	91	30-153	7	30
gamma-BHC (Lindane)	8081B	4.54	7.01	65	5.42	6.55	83	32-145	18	30

Data Evaluation Narrative Charles Gibson – September 2021 Sediment Sampling Event

SDG: R2109751 - ALS Environmental, Rochester, NY

Deliverables

The data package as submitted to Olin Corporation is complete as stipulated under the Quality Assurance Project Plan (QAPP) for the site. United States Environmental Protection Agency (USEPA) Method 8081B was utilized in laboratory testing of samples. The ALS Standard Operating Procedure (SOP) was utilized to obtain percent solids of sediment samples in order to report results on a dry weight basis.

Sample Integrity

Samples within this sample delivery group (SDG) were submitted to the ALS Environmental Laboratory in Rochester, NY for site-specific chlorinated pesticides and percent solids analyses. The sample cooler temperature measured 4.5°C upon arrival at the laboratory. The proper containers were used, the Chain of Custody was properly relinquished, and the correct analytical methods were employed. Note that the downstream location was not sampled due to lack of material in the sediment trap.

Sample Identification

This SDG contains the following sediment samples collected September 20, 2021:

SDG R2109751:

Sample ID	Sample ID
US-1-092021	MS-1-092021*

^{*} Blind Field Duplicate of US-1-092021

Chlorinated Pesticides (8081B)

The samples in this SDG were submitted for site-specific chlorinated pesticides analysis by USEPA Method 8081B.

Holding Times:

The extraction and analytical logs indicate that applicable holding times were met for samples submitted for chlorinated pesticide analysis.

Calibration:

The initial calibration data for this SDG indicates that the applicable calibration criteria were met for samples submitted for chlorinated pesticide analysis. Two of three associated continuing calibration verification (CCV) samples had recoveries above the upper laboratory control limit for 3 of 4 BHC compounds; since no analytes were detected above the method reporting limit (MRL) no data qualification was deemed necessary by professional judgment. The column breakdowns for Endrin and DDT were assessed, and the percent degradation was within QC limits each day that samples were analyzed.

Surrogate Recoveries:

The surrogate recoveries were within laboratory QC guidelines.

Blank Summary:

The analytical results of the laboratory method blank indicate that chlorinated pesticides were not detected.

Laboratory Control Sample (LCS) and LCS Duplicate (LCSD):

The LCS and LCSD spike recoveries as well as the relative percent differences (RPDs) were within QC advisory limits.

Second Column Confirmation:

The laboratory utilized a second column confirmation for the analysis of chlorinated pesticides. The confirmation results were within QC guidelines for the LCS/LCSD and performance evaluation mixture (PEM) samples.

Duplicate Sample:

According to the sampler, MS-1-092021 was a blind field duplicate of US-1-092021. All site-specific pesticides were non-detect in the parent sample and field duplicate.

Reporting Limits:

The reporting limits were elevated for all pesticide compounds analyzed since the sample extracts were diluted either 10X or 20X due to relatively high levels of non-target background concentrations. Extract clean-ups were performed but did not eliminate enough background components to prevent dilution.

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

MS/MSD analyses were performed on project sample MS-1-092021. The recoveries were below the laboratory control limits due to matrix effects described above and the resulting necessary dilutions. No data qualification was deemed necessary on project samples since the LCS/LCSD and PEM recoveries were easily within laboratory control limits.

Percent Total Solids

The two sediment samples were analyzed for Percent Total Solids by the ALS SOP. The relative percent difference (RPD) for the duplicate pair (US-1/MS-1) was 2.2.

Overall Site Evaluation and Professional Judgment Flagging Changes

The data within this SDG were compared to site data and edits to the DQE flags were not required based on professional judgment. Monitoring period completeness, which is the percentage of analytical results judged valid, including estimated values, was 100 percent for the September 2021 sampling event. Typically, project objectives are met when completeness is 90 percent or better.

Prepared by: Randy T. Morris Date: October 29, 2021