INTERIM REMEDIAL MEASURES
REMOVAL ACTION REPORT

VACANT LAND ADJACENT TO
1865 CONNECTING ROAD
NYS SITE NUMBER 932103
TOWN OF NIAGARA, NEW YORK

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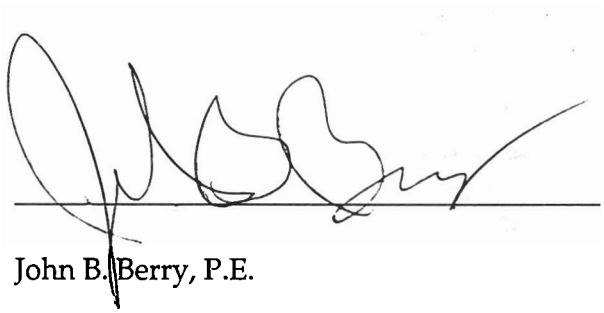
PROJECT CERTIFICATION STATEMENT

This Waste Removal Action Report is provided and certified by Rust Environment and Infrastructure to document the recently completed IRM project at the Vacant Land Site Adjacent to 1865 Connecting Road.

I certify that this document and all attachments were prepared under my direction or supervision and the information submitted is to the best of my knowledge and belief, true, accurate and complete.



3/2/94

John B. Berry, P.E. Date

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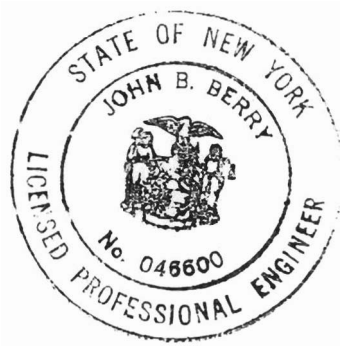


1.0 INTRODUCTION

1.1 General

This IRM Removal Action Report was prepared by Rust Environment & Infrastructure (Rust E & I) for Saperston & Day, P.C., legal representative of Benderson Development Company (Benderson), to confirm and summarize the recently completed IRM Removal Action undertaken by Benderson at the Vacant Land Site adjacent to 1865 Connecting Road in the Town of Niagara, New York. This IRM Removal Action Report is submitted at the request of the New York State Department of Environmental Conservation (NYSDEC).

1.2 Site Location

The 1865 Connecting Road Site, hereafter referred to as the "Site", is located within the southern section of the Town of Niagara, New York (refer to Figure 1). The Site is located on the northwest portion of a commercial property (presently the Niagara Factory Outlet Mall). The Site is presently enclosed within a fence. Immediately west of the Site is a drainage ditch and the adjacent Connecting Road. The BFI/CECOS Secure Chemical Management Facility is approximately one-quarter of a mile west of the Site. The Niagara Falls Outlet Mall facility is located due east of the Site.

1.3 Site History

The Site subject to this IRM Removal Action is approximately one acre in size and is located on vacant land adjacent to 1865 Connecting Road in Niagara Falls, New York, as shown on Figure 1. This tract of land was previously owned by Walter Kozdranski, Inc. and is currently owned by the Niagara County Industrial Development Agency. The majority of the property is leased by Benderson and has been developed into the Niagara Factory Outlet Mall. The Site now listed on the NYSDEC Registry of Inactive Hazardous Waste Sites constitutes a minor portion of the total tract of land leased by Benderson.

In October of 1985, a contractor excavating to construct a storm sewer line in the northwest portion of the property, encountered a two to three foot thick layer of yellow-tan waste material approximately two feet below the ground surface. In a Niagara County Department of Health (NCDOH) field report, the trench was estimated to be approximately 250 feet long and six feet deep by three feet wide. This document states that the waste was found throughout the western portion of the trench for a length of approximately 100 to 120 feet. The field report also states that the waste found had a consistency which varied from a "hard, brittle material to viscous, pliable material (clay-like in consistency)," and was "resin-like and yellow-tan" in color. Reportedly, organic odors were present. A white material visually similar to lime, small amounts of wood debris and two crushed (apparently empty) steel drums were also noted. At this time, a one liter grab sample of the yellow-tan, resin-like waste was collected by NCDOH for analysis of organics.

The analytical results of the sample, obtained as a result of the trench excavation activities, indicated the presence of 0.40 ug/g (ppm) of 2,4,6-trichlorophenol and 600 ug/g of N-nitrosodiphenylamine. Attempts to perform a halogenated organic scan on the sample yielded very scattered values on replicate analysis reportedly due to sample heterogeneity. Concentrations ranged from 9.1 to 210 ug/g as chlorine using the lindane standard. No other volatile organic compounds were noted in the NCDOH Report.

Based upon these results, NYSDEC concluded that the material encountered in the excavation contained hazardous constituents. NYSDEC instructed Benderson to dispose of the material which had been excavated from the trench. Benderson complied with this request. Approximately 250 cubic yards of material was transported to, and disposed in Secure Chemical Management Facility No. 5 at CECOS International facility in Niagara Falls, New York on May 28, 1986. The area was subsequently backfilled. The NYSDEC further stated that the in-situ material did not require immediate excavation as long as suitable measures, such as paving, were employed to minimize the potential for public contact. The area in question was estimated by NCDOH to be approximately one acre in size.

In order to obtain additional information on the waste material, a preliminary field investigation was conducted by Wehran on August 19, 1988. The objective of this work was to collect additional samples of the waste material to assesss whether it was a listed hazardous waste. A total of five hand augered borings were made at the site in the vicinity of the former trench. Waste material was encountered in two of these borings at depths of 3.5 to 4.0 feet. The waste was "resin-like" with a plastic consistency and a very strong organic odor. At a depth of approximately five feet below grade, a clayey material was encountered.

Two waste samples were collected from the borings which had waste present and were analyzed for the complete Target Compound List (TCL) and Target Analyte List (TAL). Analytical results indicated the presence of N-nitrosodiphenylamine at concentrations of 3600 and 130 ug/g; 1,2,4-trichlorobenzene at concentrations of 5.7 ug/g; inorganics (arsenic, beryllium, chromium, copper, lead, nickel, silver and zinc) at trace levels, and cyanide and total recoverable phenolics also at trace levels, at both sampling locations. One of the samples exhibited the presence of several pesticides (aldrin, alpha BHC, delta GHC, 4-4'-DDD, 4-4'-DDE, heptachlor and heptachlor-epoxide) and an additional metal (mercury).

The analytical results of samples collected from the two locations appeared to indicate contamination from two different waste types, i.e., a resinous waste and a white powder waste. Both locations exhibited detected levels of several different inorganics and organic compounds. The preliminary assessment substantiated the belief that waste materials containing hazardous constituents were disposed of at the Site.

In July 1989, Wehran installed a single boring at the Site in the same area as the previous investigation (area of trench excavation), collected an additional sample of the resinous waste and collected a grab groundwater/sediment sample from the borehole. A post-hole auger was utilized to install the boring in the northwest corner of the property. One soil/waste sample was obtained

at a depth of approximately three feet. The water/sediment sample was obtained from the same depth interval after allowing the hole to fill with water. This water/sediment sample was only used to indicate what contaminants may be present in the groundwater. The sample was not obtained from a monitoring well constructed in accordance with NYSDEC requirements and as such is not considered to be a true groundwater sample. Analysis of the soil/waste and water/sediment samples was performed utilizing USEPA Method 8270, and USEPA Method 607, Gas Chromatography for Unfamiliar Compounds, which was used to quantify the presence of diphenylamine, and inorganics. The soil/waste material was also submitted to a leaching process which mirrors the extraction procedure utilized in the EP Toxicity analysis. The analysis was performed to assess the susceptibility of the soil/waste material to the leaching of inorganic compounds.

Analysis of the soil/waste material detected a variety of inorganics. The sole organic constituent detected within the soil/waste material was N-nitrosodiphenylamine (4,300 ug/g). However, a re-extraction and re-analysis of this sample according to Method 607 indicated that less than ten percent of the total reported concentration was actually N-nitrosodiphenylamine; the remainder was diphenylamine.

The analytical results of the water/sediment sample indicated the presence of a variety of inorganic an organic compounds. The primary organic compounds were N-nitrosodiphenylamine (160 ug/L-ppb), 1,2,4-trichlorobenzene (3.1 ug/L), and 4-methylphenol (17 ug/L) (not detected in the waste). The parameters detected in the water/sediment sample that were not detected in the soil/waste are either from another source or possibly degradation products of the waste constituents. Further analysis of the sample determined that the value reported for N-nitrosodiphenylamine, which is a cumulative measurement of N-nitrosodiphenylmaine and diphenylamine, actually represents diphenylamine. The compound N-nitrosodiphenylamine, actually represents diphenylamine. The compound N-nitrosodiphenylamine was not detected. Two organic scans were also performed on the water/sediment sample. The volatile organic scan indicated the presence of 9.2 ug/L of volatile organic compounds. The volatile halogentated organic scan exhibited a concentration of 110 ug/L.

In July of 1991, Wehran was retained by Saperston and Day, P.C., legal representative for Benderson, to conduct an Interim Remedial Measure (IRM) Investigation. Twenty borings were drilled and soil samples collected and analyzed to define the nature and extent of the waste present on the Site. Waste materials that include a tan resinous waste and a white lime-like powder were encountered in 13 of the 20 borings. In addition to the borings, five piezometers were installed to define the groundwater elevation and flow direction. Specific information and conclusions associated with the investigation can be found in the IRM Interim Report-Investigation results (Wehran-February 1992).

In August of 1992, Rust E & I was retained by Saperston & Day, P.C., legal representative for Benderson, to conduct an Interim Remedial Measure (IRM) under the Site Consent Order Agreement dated July, 1992 between Benderson and the NYSDEC. Rust E & I was also contracted to perform a Supplemental Investigation Program. The Supplemental Investigation

Program was developed to address data gaps identified by Rust E & I as well as provide information necessary to select the final alternative to remediate the Site.
Between the period of August 17 and 18, 1992 and on September 28, 1992, Rust E & I conducted the Supplemental Investigation Program in which a total of forty-two (42) test pits were excavated throughout the Site. During the excavation program, Rust E & I collected several soil and water samples for chemical analysis. Specific information and findings associated with the excavation and sampling program can be found in the Supplemental IRM Report dated November 25, 1992. The Supplemental Investigation provided the following information necessary to successfully remediated the Site.

- Additional information necessary to characterize the wastes found at the Site for proper disposal;
- Additional information to assist in delineating the vertical and lateral extent of waste found at the Site.
- Additional information to assist in characterizing groundwater quality for the proper handling, storage and treatment/disposal of groundwater collected during the excavation of waste material.

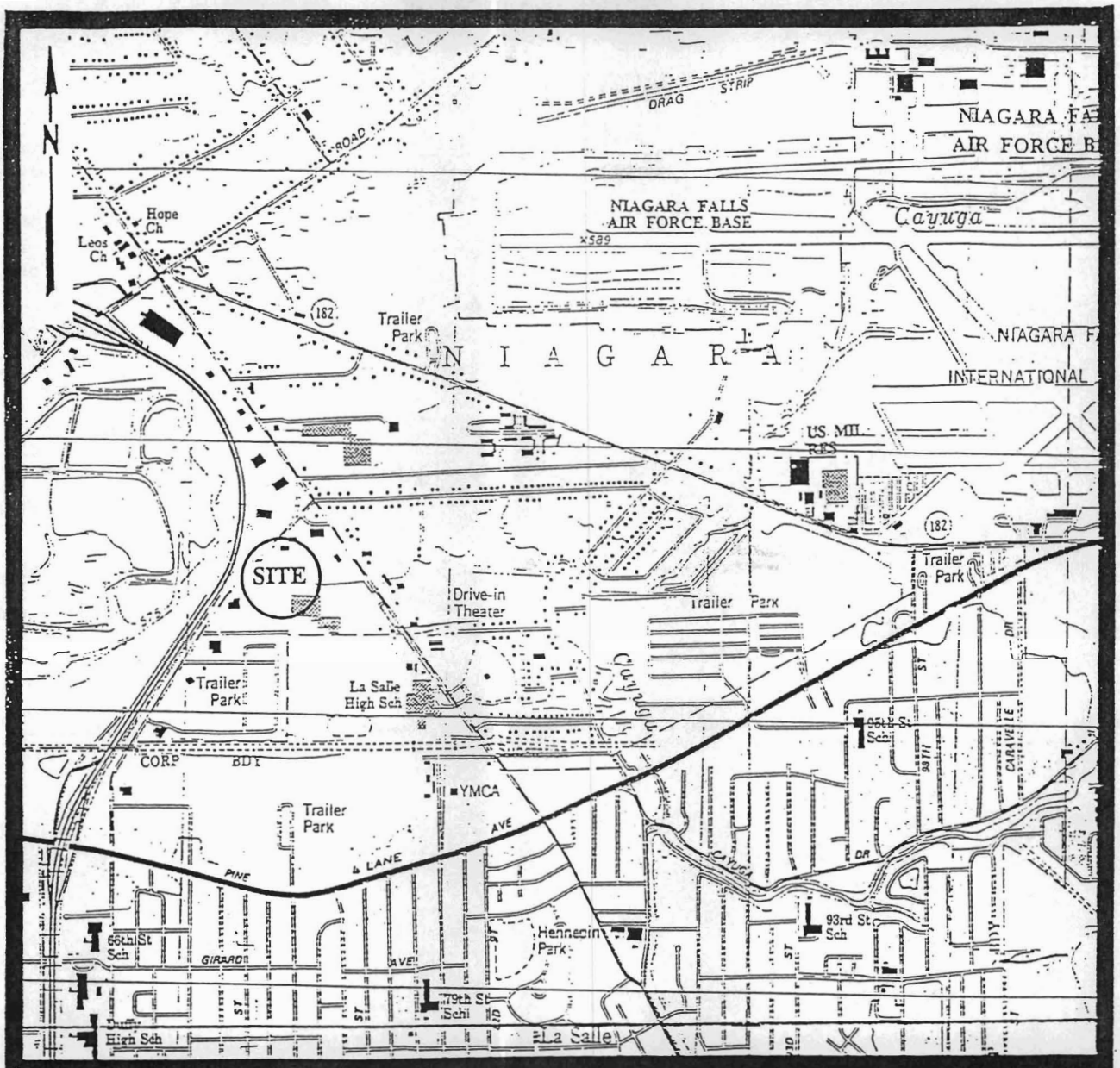
1.4 Purpose and Objective of the IRM Removal Action

The purpose of this IRM Removal Action was to remove all buried wastes, contaminated soils, debris, and water contained within the delineated waste area of the Site. In order to fulfill the purpose of this Removal Action, the following tasks were completed.

- Excavation of former disposal area;
- Transportation and disposal of wastes;
- Confirmatory soil sampling and analytical program;
- Site closure by backfill; and
- Field documentation of Construction Activities.

Site closure included backfill with crusher run stone to surface grade. The remediated area will be entirely covered by a building and/or parking lot which would restrict or prevent exposure of the surface to natural elements and that any installation of plants, trees, shrubs would be completed only with clean soils. Benderson will file with the Niagara County Clerk's Office a deed restriction/covenant prohibiting the use of the site by it or other corporations or individuals for residential purposes.

The IRM Removal Action was completed in conjunction with and pursuant to the final Consent Order Agreement dated November 5, 1993 between Benderson and NYSDEC.



SCALE 1:25 000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

CONTOUR INTERVAL 5 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

QUADRANGLE LOCATION

FIGURE 1
VACANT LAND ADJACENT TO
1865 CONNECTING ROAD
TOWN OF NIAGARA, NEW YORK

DUNN
GEOSCIENCE CORP

TONAWANDA WEST, N. Y.

2.0 PARTICIPATING AGENCIES AND COMPANIES

2.1 Site Leasee

The Benderson Development Company, Inc. (Benderson) located at 570 Delaware Avenue Buffalo, New York funded the IRM as leasee of the Site property. The designated owner and generator of waste sent off-Site for disposal is the Niagara County Industrial Development Agency.

2.2 Council

Benderson retained Saperston & Day, P.C., Attorneys at Law located at One Fountain Plaza, Buffalo, New York as legal council for this project. Saperston & Day negotiated and drafted the Consent Order for this Site.

2.3 Consultant

Rust E & I was retained by Saperston & Day, P.C. to design and observe construction of the Interim Remedial Measure on the Site. The term "Engineer" in this report refers to Rust Environment and Infrastructure.

2.4 Contractor

The Contractor for this project was Modern Environmental Group, Inc. located at 4746 Model City Road, Model City, New York. Modern provided all excavation and disposal of wastes as described in Section 1.5. The term "Contractor" in this report refers to Modern Environmental Group, Inc.

2.5 State and Local Agencies

The following State and local agencies provided review and oversight comments on project document submittals. The NYSDEC, Region 9 has kept informed the surrounding residences, tenants and general public of site cleanup activities through information released to local newspapers.

Document Repository
New York State Department of Environmental Conservation, Region 9
270 Michigan Avenue
Buffalo, New York 14203-2999

New York State Department of Health
2 University Place
Albany, New York 12203

Niagara County Department of Health
10th and East Fall Street
Niagara Falls, New York 14302

3.0 SITE DESCRIPTION

3.1 Site Topography

The Site is located on vacant land with the majority of the property developed as the Niagara Factory Outlet Mall. As shown on Figure 1, the Site is located immediately east of Connecting Road.

Prior to waste removal, part of the Site was paved and was once used as a parking area for the Factory Outlet Mall. This area is flat and slopes to the southeast and east, directing storm drainage to catch basins located throughout the Malls' parking lot. The Mall buildings are located to the east and southeast of the Site.

In addition to the paved area prior to waste removal, there was a grassed area in the northwestern corner of the Site. This area is bounded by a machine tool manufacturer, a paved parking area, and Connecting Road. This part of the Site had several areas where blacktop and cement were dumped in piles. The extreme western section of the Site slopes to a drainage swale parallel to Connecting Road while the other unpaved areas slope gently to the south and east. The Site was surrounded by a wooden stockade fence for purposes of preventing incidental access during the Investigation and Remediation of the Site.

3.2 Regional Geology/Hydrogeology

The Site is located within the Erie-Ontario Lowlands physiographic province. The province was formerly a lake bottom during Lake Wisconsin deglaciation, and is characterized by generally flat topography. In the project area, the land elevation ranges between 570 to 577 feet above mean sea level, and slopes to the south-southwest towards the Niagara River.

The majority of the Site was filled in the past to depths up to eight feet. The fill materials consisted of soil, slag, construction and demolition (C & D) debris, resinous waste, white powder and other materials.

The general stratigraphy at the Site can be described as follows:

- Pavement and Crusher Run, some Sand and Silt, dry, loose (0.0 - 2.0 ft.);
- Waste materials, tan resinous, some white powder (0.0-8.0 ft.);
- Red-Brown black fine Silty Sand, little Clay trace Gravel, reworked, dry (2.0-4.0 ft.);
- Red-Brown Silty Clay, trace fine Gravel trace Sand, stiff, moist (4.0-14.0 ft);
- Top of rock at 14.0 feet, Lockport Dolostone vuggy, gypsum infilling, porous.

The Silty Clay unit occurred at depths ranging from four to seven feet due primarily to the variations in surficial elevations. From the ground surface to the top of the Silty Clay, the fill material consisted of construction and demolition (C & D) debris, blacktop, cinders, slag, wood and ash.

Regionally, groundwater flow in the bedrock is to the south-southwest towards the Niagara River as stated in The Interim Remedial Measure Investigation Report dated February, 1992 and prepared by Wehran-New York, Inc.

4.0 IRM REMOVAL ACTION CONSTRUCTION ACTIVITIES AND FINDINGS

4.1 General

The following section briefly describes the implementation, operation and findings of the various IRM construction activities performed at the Site. On January 3, 1994, IRM construction activities commenced at the project Site. Excavation, removal and disposal work activities were performed by Modern Environmental Group, Inc. under the direction and supervision of Rust E & I and Benderson personnel. Backfill work activities were performed by Haseley Trucking under the direction of Benderson personnel.

4.2 Site Preparation and Mobilization

Prior to the commencement of any remedial operations, the following Site preparation and mobilization activities were performed by the Contractor:

- Mobilization and set up of field offices, sanitary facilities and decontamination trailer;
- Installation and connection of utility services (ie, electric and telephone);
- Installation and connection of utility services (ie, electric and telephone);

  Installation of pedestrian and truck gates in the existing perimeter fence;

  Removal of snow; and
- Construction of the decontamination pad.

The decontamination pad was constructed as specified in the bid documents except for the following modifications requested by the Contractor. These alterations were approved by Rust E & I oversight personnel at no additional cost to Benderson.

- Substitution of the specified 40 mil thick high density polyethylene (HDPE) liner with an 80 ml thick HDPE liner;
- The addition of a geotextile overlay to the HDPE liner;
- Substitution of 2 inch crusher run gravel for the specified top layer of sand;
- The addition of 4 inch underdrains that terminated in the centrally located sump;
- Substitution of 1/2 inch thick particle board for the specified wall tarps.

4.3 Waste Identification, and Extent During Excavation and Removal

The type and amount of waste encountered at the Site was variable. The most significant in volume was the tan-yellow resinous waste. Additional wastes and fill encountered during excavation was a white-blue/gray powder, drums, construction and demolition (C & D) debris, cinders, slag, bricks and ash. Waste material during excavation was encountered in pockets, thin to thick layers and mixed with soil and fill. The most significant waste type encountered was the tan-yellow resin that was excavated and removed in a layer ranging in thickness from 1 inch to 4 feet. All wastes encountered and as mentioned above have been properly characterized as non-hazardous during the IRM Supplemental Investigation, dated November 25, 1993.

In addition to the above mentioned identified wastes, a red resinous material was encountered in several drums. This material was sampled and analyzed for TCLP to properly characterize this waste for disposal. Analytical results can be referenced on Table 1. Analytical laboratory data can be referenced in Appendix A. In total, approximately 15 drums in varying conditions from rusted, crushed carcasses to waste filled drums were excavated and staged to await disposal. The waste filled drums contained the previously identified tan-yellow resin, white powder and red resin.

4.4 Excavation and Disposal of Waste

Upon completion of mobilization activities, waste excavation and removal operations were initiated. Waste excavation and removal operations at the Site were conducted between January 11 and February 15, 1994.

Waste removal commenced with excavation of waste on the eastern end of excavation cells 1 and 2 and proceeded towards the western end of the delineated area as defined in the Supplemental Investigation Report dated November 25, 1993. All material was excavated to the top of clay and removed within the specified excavation limit. Wastes were visually identified and removed vertically and laterally. Vertically, all soil and wastes were removed down to the depth of the top of clay surface. After excavating a significant portion of a specific excavation cell, approximately one foot of clay was removed from the bottom of the excavation. Laterally, the excavation proceeded until no visual signs of contaminated wastes were present. The as built delineation of waste excavated during the Removal Action is referenced on Figure 2.

Clay from the bottom of the excavation was stripped by bulldozer that operated under a "clean" designation. Excavated clay was pushed forward into the contaminated areas to form clay berms to separate contaminated surface water from non-contaminated surface water that had entered the excavation.

All excavated soils, waste and debris were classified as a non-hazardous waste based upon analytical data presented in the Supplemental Investigation Report dated November 25, 1992. Excavated waste was transported for disposal by tandem and tractor trailer dump trucks to Modern Landfill, a permitted solid waste landfill.

4.5 Disposal of Pre-Existing On-Site Drums

As part of the Removal Action, 27 drums filled with solids, liquids and personnel protective equipment generated from past Site investigations were removed and disposed off-Site with the excavated waste. These drums were transported and disposed of on February 9, 1994 at the working face of Modern Landfill in a pit dug specifically for these wastes. The NYSDEC field representative witness this drum shipment to verify proper disposal. Site correspondence can be referenced in Appendix C.

4.6 Disposal of Excavated Drums

During excavation, a small amount red resinous waste was segregated from the accepted waste stream and staged on-Site. The approximate volume that was staged on-Site to await disposal was three half-filled 55 gallon drums. This material was sampled and analyzed for TCLP and RCRA Waste Characterization. The TCLP analytical results, as referenced on Table 2, classified this waste as non-hazardous.

In addition to the red resin filled drums, approximately 10 drums containing the accepted wastes of yellow resin and white powder were also staged and after approval by NYSDEC they were disposed of at Modern Landfill.

4.7 Disposal Requirements

Site wastes were classified as non-hazardous and approved for acceptance by the NYSDEC through the submission of Form 47-19-7 Application for Treatment or Disposal of an Industrial Waste Stream. The accepted waste stream was disposed of under the NYSDEC's subsequently issued Application No. M93-0415. The waste generator listed on the Application was Niagara County Industrial Development Agency and can be referenced in Appendix C.

As work progressed the existing Application had to be modified to include the red resin filled drums and drums containing the accepted wastes of yellow-resin and white powder. In addition, the Application was modified to reflect the increase in the amount of material excavated and removed from the Site.

4.8 Backfill of Excavation

Backfilling of the excavation occurred within the excavation cell boundaries and after confirmatory soil sample results were accepted by the NYSDEC. Confirmatory soil sample analytical results can be referenced in Section 4.10. Backfill was placed in one foot lifts and compacted with a vibrating roller. Backfill material consisted of 2 inch crusher run stone that was supplied by Haseley Trucking.

4.9 Control of Water in the Excavation

In order to prevent the possible migration of contaminants from the active excavation face, the Contractor constructed clay berms to maintain separation of contaminated water from non-contaminated water. Water entered the excavation as surface runoff, rain, groundwater and snow melt. Surface water that collected behind the clay berms on the stripped clay surface was designated as non-contaminated. This water was discharged into the existing on-Site catch basin. Surface water that collected in the contaminated excavation was designated as contaminated. This water was pumped into a nearby Contractor supplied tanker truck.

4.9.1 Disposal of Wastewater

Contaminated water from the excavation and decontamination wash water was collected and transferred into a tanker truck. The wastewater was accepted for disposal at the North Tonawanda Wastewater Treatment Plant located at 830 River Road in North Tonawanda after review of analytical data acquired during the Supplemental Investigation. Approximately 7,300 gallons of contaminated water was disposed of at the above mentioned plant. Disposal approval correspondence can be referenced in Appendix C.

4.10 Confirmatory Soil Sampling

After the one foot of clay was stripped and removed, composite confirmatory soil samples were collected from each excavated cell floor and sidewall. Soil samples were analyzed for the following indicator chemicals and cleanup goals established for the Site by the Removal Action Plan dated September, 1993.

- Aniline 850 ug/kg
- Benzothiazole 850 ug/kg
- Phenothiazine 850 ug/kg
- 2-Mercaptobenzothiazole 850 ug/kg
- Diphenylamine 850 ug/kg

The analytical results from the post excavation confirmatory soil sampling were used to confirm that the Removal Action met the established project soil cleanup goals. The following summarizes confirmatory soil sample analytical results from the floor and walls of each excavation cell. Analytical results are presented on Table 1.

- Concentrations of indicator chemicals were non-detectable or below the established project soil cleanup goals in confirmatory soil samples collected from the floors and sidewalls of excavation cells 5,7,8,9,11,12 and only the floors of 2,3,4,6 and 10.

- Concentrations of 2-Mercaptobenzothiazole were detected above the established project soil cleanup goals in confirmatory soil samples collected from the sidewalls of excavation cells 2, 6 and 10. The elevated 2-Mercaptobenzothiazole concentrations of 3100, 1600 and 1600 ppb, respectively, were accepted by the NYSDEC. These results confirmed the Removal Action was complete and met the project soil cleanup goals for the Site within these excavation cells.

- Concentrations of indicator chemicals were detected above the established project soil cleanup goals in initial confirmatory soil samples collected from the floor and sidewalls of excavation cell 1. The elevated concentrations of 2-Mercaptobenzothiazole and Benzothiazole at 40,000 and 4700 ppb, respectively, were detected in the cell floor. The elevated concentrations of 2-Mercaptobenzothiazole at 4000 ppb were detected in the cell sidewall. The excavation cell floor and sidewall were resampled after being scrapped of a contaminated dust that resulted from the upwind excavation of an adjacent cell. Concentrations of indicator chemicals in the subsequent resampling of the both excavation cell floors and sidewalls were non-detectable and below the established project soil cleanup goals.

  Concentrations of indicator chemicals were detected above the established project soil cleanup goals in initial confirmatory soil samples collected from the sidewalls of excavation cells 3 and 4. Elevated concentrations of 2-Mercaptobenzothiazole and Benzothiazole at 12,000 and 1600 ppb, respectively, were detected in excavation cell 3. In addition, elevated concentrations of the similar compounds were detected at 6400 and 1400 ppb, respectively in excavation cell 4. Both excavation cell sidewalls were re-excavated laterally for approximately 5 feet. Concentrations of only 2-Mercaptobenzothiazole in the subsequent resampling of excavation cell 3 sidewall were detected at 1600 ppb. All other indicator chemicals were non-detectable. The NYSDEC accepted these results confirming the Removal Action was complete in this specific cell. Concentration of indicator chemicals were non-detectable or below the established project soil cleanup goals in subsequent resampling of excavation cell 4.

4.11 Documentation Air Monitoring and Sampling

An air monitoring program was implemented by the Engineer as stipulated in the Project Health and Safety Plan (HASP). The purpose of the air monitoring program was to assure that the proper level of personnel protective equipment was used by on-Site workers; to document that the level of worker protection was adequate; and to assess if contaminates were migrating off-Site.

Real time air monitoring was performed by the Engineer on a continuous basis as the waste excavation proceeded. Real time air monitoring included sampling for organic vapors, combustible gases, oxygen deficiency, total dust and radioactivity. If action levels established in the accepted HASP were exceeded at the excavation face, work could be suspended until levels decreased by natural ventilation. However, no instances occurred

when high concentrations of organic vapors forced waste removal operations to be suspended for any length of time. In addition, no radiation readings were detected above background during this project. Real time air monitoring logs can be referenced in Appendix B.

Documentation air monitoring was performed twice a week at regularly scheduled intervals during working hours. Documentation air monitoring was conducted at three Site perimeter locations, from which three samples were analyzed (one upwind and two downwind). Organic vapor samples were collected for an eight-hour period using air sampling pumps with charcoal sorbant tubes and analyzed for aniline according to the National Institute for Occupational Safety and Health (NIOSH) Method 2002.

The documentation air monitoring results did not at any time detect aniline at concentrations above the analytical Practical Quantifiable Limits at either the upwind or downwind sampling locations. All air monitoring samples were analyzed by Advanced Environmental Services of Niagara Falls, New York. The analytical results of documentation air monitoring are presented on Table 3.

4.12 Quality Assurance/Quality Control

Analytical services were provided by CTM Analytical Labs, Ltd., a NYSDOH approved and certified laboratory located in Latham, New York. The selected laboratory was required to meet all applicable documentation, data reduction and reporting protocols as specified in SW-846 and Project Quality Assurance/Quality Control Plan. All analytical data from confirmatory soil samples were reviewed by the Engineer and found acceptable.

Field/rinse blanks were collected to assess the effectiveness of the cleaning procedures used on the sampling equipment. These blank samples were defined as the final rinse of the cleaning procedure using deironized water. Each blank sample was analyzed for the same indicator chemicals as the confirmatory soil samples collected that day. Concentrations of indicator chemicals were non-detectable in all field/blank samples collected throughout the duration of the project. Analytical results are presented on Table 1.

Project objectives were met in achieving analytical result turn around time of approximately 48 hours on confirmatory soil samples. Furthermore, backfill operations were not delayed by analytical results that confirmed project soil cleanup goals.

TABLE 1

Page 1 of 3

IRM REMOVAL ACTION

Vacant Land Adjacent to 1865 Connecting Road

Confirmatory Soil Sample Analytical Results

Concentration values in ug/kg-ppb

Sample #	S1-4'-1B	S1A-4'-1B	S1B-4.5'-1B	S2-2'-1W	S2A-2'-1W	S3-4'-2B	S4-2'-2W	S5-4'-4B	Project Site
Sample Date	14-Jan	18-Jan	18-Jan	14-Jan	18-Jan	18-Jan	18-Jan	25-Jan	Soil Cleanup
Excavation Cell	1	1	1	1	1	2	2	4	Goals
Indicator Chemicals									
Aniline	ND	ND	ND	ND	ND	ND	ND	ND	850
Diphenylamine	380	ND	ND	ND	ND	ND	ND	ND	850
2-Mercaptobenzothiazole	40000	ND	ND	4000	620	ND	3100	ND	850
Benzothiazole	4700	ND	ND	810	ND	ND	530	ND	850
Phenothiazine	420	ND	ND	ND	ND	ND	ND	ND	850

Sample #	S6-2'-4W	S6A-2'-4W	S7-4'-3B	S8-2'-3W	S8A-2'-3W	S9-5'-5B	S10-2'-5W	S11-5'-6B	Project Site
Sample Date	25-Jan	1-Feb	25-Jan	25-Jan	31-Jan	28-Jan	28-Jan	28-Jan	Soil Cleanup
Excavation Cell	4	4	3	3	3	5	5	6	Goals
Indicator Chemicals									
Aniline	ND	ND	ND	ND	ND	ND	ND	280	850
Diphenylamine	ND	ND	ND	ND	ND	ND	ND	ND	850
2-Mercaptobenzothiazole	6400	ND	ND	12000	1600	ND	ND	ND	850
Benzothiazole	1400	240	ND	1400	410	ND	ND	330	850
Phenothiazine	ND	ND	ND	ND	ND	ND	ND	ND	850

TABLE 1

Page 2 of 3

IRM REMOVAL ACTION
Vacant Land Adjacent to 1865 Connecting Road
Confirmatory Soil Sample Analytical Results

Concentration values in ug/kg-ppb

Sample #	S12-2'-6W	S13-5'-8B	S14-3'-8W	S15-6'-7B	S16-4'-7W	S17-6'-10B	S18-4'-10W	S19-6'-12B	Project Site
Sample Date	28-Jan	1-Feb	1-Feb	3-Feb	3-Feb	3-Feb	3-Feb	8-Feb	Soil Cleanup
Excavation Cell	6	8	8	7	7	10	10	12	Goals
Indicator Chemicals									
Aniline	ND	ND	ND	ND	ND	ND	ND	ND	850
Diphenylamine	ND	ND	ND	ND	ND	ND	ND	ND	850
2-Mercaptobenzothiazole	1600	ND	ND	ND	670	540	1600	ND	850
Benzothiazole	410	ND	ND	210	ND	ND	ND	ND	850
Phenothiazine	ND	ND	ND	ND	ND	ND	ND	ND	850

Sample #	S20-4'-12W	S 1-7'-11B	S22-5'-11W	S23-6'-9B	S24-4'-9W	Project Site
Sample Date	8-Feb	10-Feb	10-Feb	11-Feb	11-Feb	il Cleanup
Excavation Cell	12	1	11	9	9	Goals
Indicator Chemicals						
Aniline	ND	ND	ND	ND	ND	850
Diphenylamine	ND	ND	ND	ND	ND	850
2-Mercaptobenzothiazole	ND	ND	ND	ND	ND	850
Benzothiazole	ND	ND	ND	ND	ND	850
Phenothiazine	ND	ND	ND	ND	ND	850

TABLE 1

IRM REMOVAL ACTION

Vacant Land Adjacent to 1865 Connecting Road

Field / Rinse Blank Analytical Results

Concentration values in ug/kg-ppb

Sample #	W1-Blank	W2-Blank	W3-Blank	W4-Blank	Project Site
Sample Date	18-Jan	28-Jan	3-Feb	11-Feb	Soil Cleanup Goals
Indicator Chemicals					
Aniline	ND	ND	ND	ND	850
Diphenylamine	ND	ND	ND	ND	850
2-Mercaptobenzothiazole	ND	ND	ND	ND	850
Benzothiazole	ND	ND	ND	ND	850
Phenothiazine	ND	ND	ND	ND	850

TABLE 2
IRM REMOVAL ACTION
Vacant Land Adjacent to 1865 Connecting Road
TCLP and RCRA Waste Characterization Analytical Results
Red Resin
Concentration values in mg/l-ppm

TCLP Parameters	Analytical Results	Regulatory Limit
O-Cresol	4	200
M & P Cresol	2.2	200
Methyl Ethyl Ketone	19	200
Arsenic	0.003	5
Barium	0.3	100
Cadmium	<0.02	1
Chromium	<0.05	5
Lead	<0.1	5
Selenium	<0.002	1
Silver	<0.02	5
RCRA Characterization		
Ignitability	>200 F	140 F
Corrosivity	Non-Corrosive	Corrosive
pH	7.9	2-12.5
Reactivity: Cyanide	*	-
Sulfide	ND	
Total Cyanide	ND	-

*The concentration of total cyanide for this sample is less than 100 mg/kg. This is well below the reactive cyanide regulatory level of 250 mg/kg. A reactive cyanide analysis is not necessary.

TABLE 3
IRM REMOVAL ACTION
Vacant Land Adjacent to 1865 Connecting Road
Documentation Air Monitoring Analytical Results
Target Compound: Aniline
Concentration Values in mg/mg^3

Sample Identification	Sample Date	Analytical Results	Practical Quantifiable Limit
A1-Upwind	11-Jan	BQL	5.6
A2-Downwind	11-Jan	BQL	4.7
A3-Downwind	11-Jan	BQL	10
A4-Blank	11-Jan	BQL	0.08
A5-Upwind	13-Jan	BQL	4.4
A6-Downwind	13-Jan	BQL	4.5
A7-Downwind	13-Jan	BQL	5.1
A8-Upwind	18-Jan	BQL	2
A9-Downwind	18-Jan	BQL	2.6
A10-Downwind	18-Jan	BQL	3.1
A11-Blank	18-Jan	BQL	0.08
A12-Upwind	20-Jan	BQL	2.1
A13-Downwind	20-Jan	BQL	2.3
A14-Downwind	20-Jan	BQL	2.4
A15-Upwind	25-Jan	BQL	1.8
A16-Downwind	25-Jan	BQL	1.9
A17-Downwind	25-Jan	BQL	2.2
A18-Upwind	27-Jan	BQL	2
A19-Downwind	27-Jan	BQL	2.1
A20-Downwind	27-Jan	BQL	2
A21-Blank	27-Jan	BQL	0.08
A22-Upwind	1-Feb	BQL	2.1
A23-Downwind	1-Feb	BQL	2.2
A24-Downwind	1-Feb	BQL	3.2
A25-Blank	1-Feb	BQL	0.08
A26-Upwind	3-Feb	BQL	1.8
A27-Downwind	3-Feb	BQL	1.9
A28-Downwind	3-Feb	BQL	2.6
A29-Upwind	8-Feb	BQL	2.9
A30-Downwind	8-Feb	BQL	5.6
A31-Downwind	8-Feb	BQL	3
A32-Blank	8-Feb	BQL	0.08
A33-Upwind	10-Feb	BQL	2
A34-Downwind	10-Feb	BQL	2.3
A35-Downwind	10-Feb	BQL	3.4

5.0 DOCUMENTATION OF IRM CONSTRUCTION ACTIVITIES

The Engineer was responsible as Benderson's representative for Construction oversight and documentation of the waste removal operations as stated in the Removal Action Plan dated September, 1993. Documentation included the preparation of daily inspection reports, contract quantity verification, visual identification and delineation of wastes, confirmatory soil sampling, perimeter air monitoring, Site health and safety and general correspondence. In addition to Contract oversight, a photographic record was compiled to document the sequence of the waste removal throughout the project. This record included both still photographs and VHS video taping.

6.0 IRM CONSTRUCTION MODIFICATIONS

6.1 Construction Modifications

The project schedule was expanded from 6 weeks to 7 weeks due to a waste removal quantity overrun. Waste removal operations commenced on January 11, 1994 and were completed on February 11, 1994. The contract documents originally estimated 6000 tons of waste were to be removed. However, 12,879 tons were actually removed.

The additional waste removal quantity that contributed to the quantity overrun were the result of several varying factors. The perimeter of the delineated waste removal area that was defined in the Supplemental Investigation Report was extended in several excavation cells as stated in Section 4.3 and Figure 2. Visual confirmation of wastes during excavation resulted in this extension of excavation cell boundaries and the perimeter of the delineated area. In addition, excavation depth in the western located excavation cells ranged from approximately 7 feet to 11 feet which was considerably deeper than encountered in past Site investigations. Furthermore, the weight per cubic foot of material excavated was heavier than previously expected due to the colder weather freezing and holding moisture and water in the excavated soils. This was evident during excavation when the initial 2.5 feet to 3 feet of excavated soils were frozen. If this Removal Action was conducted during warmer temperatures, additional quantities of groundwater and surface water would then have entered the excavation. The near absence of water during the excavation minimized pumping problems and the possible contamination and re-excavation of designated "clean" zones that awaited acceptable confirmatory soil analytical results.

Excavation procedures were altered in the early phases of this project. After the first round of confirmatory soil analytical results were received, it was apparent, due to high concentrations of indicator chemicals present, that the designated excavation procedures were not achieving project soil cleanup goals. Excavation procedures were modified to allow the excavator to remove only contaminated soils and wastes down to the top of clay surface. The specified layer of clay to be remove was left in place until all contaminated wastes were removed from the specific excavation cell. The clay was then stripped by bulldozer operating under a "clean" designation. Confirmatory sampling subsequently followed the stripping operations. Indicator chemical concentrations were greatly reduced in analytical results from confirmatory soil samples collected after the above mentioned modification in excavation procedures.

6.2 Weather

Weather conditions throughout most of this project were wintery with temperatures during most of January and early February, 1994 averaging below 15° Fahrenheit. Cold freezing temperatures minimized groundwater and surface water from entering the contaminated excavation face resulting in low quantities of contaminated water. Throughout the entire

five weeks of excavation only one warm rainy day occurred. This one day of warmer weather produced 6100 gallons of contaminated water.
In addition to minimizing groundwater and surface water infiltration into the excavation. The colder weather was also responsible for limiting organic vapors emitting from the waste. Volatility of chemical volatile and semi-volatile organic compounds decrease as temperature decreases. This resulted in less personnel on-Site hazard, odor and public awareness in adjacent Mall parking lots and buildings.

6.3 Health and Safety

Prior to the commencement of any Site Removal Action work, the Contractor submitted a request to downgrade personnel protection from the specified Level C to Level D. This modification was noted and approved by the Engineer, NYSDEC and Benderson.

During construction, an upgrade to Level C personnel protection was utilized by personnel who were near or downwind of the excavation only when strong odors were present. In addition, this protection was used during high dust events which resulted from the excavation of white powder.

bend dev 35670.700 irm.rep
2/22/94

Appendix A

Analytical Data

CTM Analytical Laboratories, Ltd.

15 Century Hill Drive
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FAX 518-786-7139

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RUST ENV & INFRASTRUCTURE
495 COMMERCE DRIVE
AMHERST NY 14228

Attention: MR. PAUL STECK

CTM PROJECT #: 94.02065

CTM Task #: 940117A

Purchase Order Number: 97-930001
Date Sampled: 01/14/94 Time: 16:00
Sampled By : ROWLINSON
Sample Id: FOM-S1-4'-1B
Location : SAPERSTON & DAY

CTM Sample No: 940117A 01
Date Received: 01/15/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	76.4		%	SP 1/17/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSD:3 1/17/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	380	220	MCG/KG	GCMSD:3 1/17/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	40,000	8,800	MCG/KG	GCMSD:3 1/17/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	4,700	4,400	MCG/KG	GCMSD:3 1/17/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	420	220	MCG/KG	GCMSD:3 1/17/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 1/17/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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AMHERST NY 14228

Attention: MR. DAVE ROWLINSON

CTM PROJECT #: 94.02065

CTM Task #: 940119D

Purchase Order Number: 97-9300001
Date Sampled: 01/18/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S1A-4'-1B
Location : SAPERSTON & DAY

CTM Sample No: 940119D 01
Date Received: 01/19/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	POL.	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	77		%	SP 1/21/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			DO 1/19/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSD:5 1/20/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSD:5 1/20/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	440	MCG/KG	GCMSD:5 1/20/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSD:5 1/20/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSD:5 1/20/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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CTM PROJECT #: 94.02065

CTM Task #: 940119D

Attention: MR. DAVE ROWLINSON

Purchase Order Number: 97-9300001
Date Sampled: 01/18/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S1B-4.5-1B
Location : SAPERSTON & DAY

CTM Sample No: 940119D 03
Date Received: 01/19/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	79		%	SP 1/21/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			DO 1/19/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSD:5 1/20/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSD:5 1/20/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	440	MCG/KG	GCMSD:5 1/20/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSD:5 1/20/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSD:5 1/20/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. PAUL STECK

CTM PROJECT #: 94.02065

CTM Task #: 940117A

Purchase Order Number: 97-930001
Date Sampled: 01/14/94 Time: 16:00
Sampled By : ROWLINSON
Sample Id: FOM-S2-2'-1W
Location : SAPERSTON & DAY

CTM Sample No: 940117A 02
Date Received: 01/15/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	79.9		%	SP 1/17/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSD:3 1/17/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSD:3 1/17/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	4,000	440	MCG/KG	GCMSD:3 1/17/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	810	220	MCG/KG	GCMSD:3 1/17/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSD:3 1/17/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 1/17/94

REMARKS:

END OF REPORT

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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CTM PROJECT #: 94.02065

CTM Task #: 940119D

Attention: MR. DAVE ROWLINSON

Purchase Order Number: 97-9300001
Date Sampled: 01/18/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S2A-2'-1W
Location : SAPERSTON & DAY

CTM Sample No: 940119D 02
Date Received: 01/19/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	81		%	SP 1/21/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			DO 1/19/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSD:5 1/20/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSD:5 1/20/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	620	420	MCG/KG	GCMSD:5 1/20/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSD:5 1/20/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSD:5 1/20/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. DAVE ROWLINSON

CTM PROJECT #: 94.02065

CTM Task #: 940119D

Purchase Order Number: 97-9300001
Date Sampled: 01/18/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S3-4'-2B
Location : SAPERSTON & DAY

CTM Sample No: 940119D 05
Date Received: 01/19/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	80		%	SP 1/21/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			DO 1/19/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSD:5 1/20/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSD:5 1/20/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSD:5 1/20/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSD:5 1/20/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSD:5 1/20/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. DAVE ROWLINSON

CTM PROJECT #: 94.02065

CTM Task #: 940119D

Purchase Order Number: 97-9300001
Date Sampled: 01/18/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S4-2'-2W
Location : SAPERSTON & DAY

CTM Sample No: 940119D 06
Date Received: 01/19/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	83		%	SP 1/21/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			DO 1/19/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	200	MCG/KG	GCMSD:5 1/20/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	200	MCG/KG	GCMSD:5 1/20/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	3,100	400	MCG/KG	GCMSD:5 1/20/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	530	200	MCG/KG	GCMSD:5 1/20/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	200	MCG/KG	GCMSD:5 1/20/94

REMARKS:

END OF REPORT

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. PAUL STECK

CTM PROJECT #: 94.02065

CTM Task #: 940126D

Purchase Order Number: 97-9300001
Date Sampled: 01/25/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S7-4'-3B/ S&D
Location : UNKNOWN

CTM Sample No: 940126D 03
Date Received: 01/26/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	78.7		%	LSM 1/28/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSB:10 1/28/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSB:10 1/28/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	440	MCG/KG	GCMSB:10 1/28/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSB:10 1/28/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSB:10 1/28/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 1/26/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. PAUL STECK

CTM PROJECT #: 94.02065

CTM Task #: 940126D

Purchase Order Number: 97-9300001
Date Sampled: 01/25/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S8-2'3W/ S&D
Location : UNKNOWN

CTM Sample No: 940126D 04
Date Received: 01/26/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	78.8		%	LSM 1/28/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSB:10 1/28/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSB:10 1/28/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	12,000	2,200	MCG/KG	GCMSB:10 1/28/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	1,400	220	MCG/KG	GCMSB:10 1/28/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSB:10 1/28/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 1/26/94

REMARKS:

END OF REPORT

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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CTM PROJECT #: 94.02065

CTM Task #: 940201A

Attention: MR. PAUL STECK

Purchase Order Number: 97-9300001
Date Sampled: 01/31/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S8A-2'-3W
Location : UNKNOWN

CTM Sample No: 940201A 01
Date Received: 02/01/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	77.2		%	SP 2/1/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			DO 2/1/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSB:13 2/1/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSB:13 2/1/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	420	MCG/KG	GCMSB:13 2/1/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSB:13 2/1/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSB:13 2/1/94

REMARKS:

END OF REPORT

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. PAUL STECK

CTM PROJECT #: 94.02065

CTM Task #: 940126D

Purchase Order Number: 97-9300001
Date Sampled: 01/25/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S5-4'4B/ S&D
Location : UNKNOWN

CTM Sample No: 940126D 01
Date Received: 01/26/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	80.0		%	LSM 1/28/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSB:10 1/28/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSB:10 1/28/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	420	MCG/KG	GCMSB:10 1/28/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSB:10 1/28/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSB:10 1/28/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 1/26/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. PAUL STECK

CTM PROJECT #: 94.02065

CTM Task #: 940126D

Purchase Order Number: 97-9300001
Date Sampled: 01/25/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S6-2'-4W/ S&D
Location : UNKNOWN

CTM Sample No: 940126D 02
Date Received: 01/26/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	77.9		%	LSM 1/28/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSB:10 1/28/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSB:10 1/28/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	6,400	4,400	MCG/KG	GCMSB:10 1/28/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	1,400	220	MCG/KG	GCMSB:10 1/28/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSB:10 1/28/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 1/26/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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CTM PROJECT #: 94.02065

CTM Task #: 940202B

Attention: MR. PAUL STECK

Purchase Order Number: 97-9300001
Date Sampled: 02/01/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S6A-2'-4W
Location : SAPERSTON & DAY

CTM Sample No: 940202B 03
Date Received: 02/02/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	82.3		%	JD 2/3/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			DO 2/2/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	200	MCG/KG	GCMSB:15 2/3/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	200	MCG/KG	GCMSB:15 2/3/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	400	MCG/KG	GCMSB:15 2/3/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	240	200	MCG/KG	GCMSB:15 2/3/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	200	MCG/KG	GCMSB:15 2/3/94

REMARKS:

END OF REPORT

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. PAUL STECK

CTM PROJECT #: 94.02065

CTM Task #: 940131A

Purchase Order Number: 97-9300001
Date Sampled: 01/28/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S9-5'-5B
Location : UNKNOWN

CTM Sample No: 940131A 01
Date Received: 01/29/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	76.8		%	SP 2/1/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 1/31/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSB:13 2/1/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSB:13 2/1/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	440	MCG/KG	GCMSB:13 2/1/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSB:13 2/1/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSB:13 2/1/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. PAUL STECK

CTM PROJECT #: 94.02065

CTM Task #: 940131A

Purchase Order Number: 97-9300001
Date Sampled: 01/28/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S10-2'-5W
Location : UNKNOWN

CTM Sample No: 940131A 02
Date Received: 01/29/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	76.7		%	SP 2/1/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 1/31/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSB:13 2/1/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSB:13 2/1/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	440	MCG/KG	GCMSB:13 2/1/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSB:13 2/1/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSB:13 2/1/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. PAUL STECK

CTM PROJECT #: 94.02065

CTM Task #: 940131A

Purchase Order Number: 97-9300001
Date Sampled: 01/28/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S11-5'-6B
Location : UNKNOWN

CTM Sample No: 940131A 03
Date Received: 01/29/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	75.4		%	SP 2/1/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 1/31/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	280	220	MCG/KG	GCMSB:13 2/1/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSB:13 2/1/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	440	MCG/KG	GCMSB:13 2/1/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	330	220	MCG/KG	GCMSB:13 2/1/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSB:13 2/1/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. PAUL STECK

CTM PROJECT #: 94.02065

CTM Task #: 940131A

Purchase Order Number: 97-9300001
Date Sampled: 01/28/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S12-2'-6W
Location : UNKNOWN

CTM Sample No: 940131A 04
Date Received: 01/29/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	76.1		%	SP 2/1/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 1/31/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSB:13 2/1/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSB:13 2/1/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	1,600	420	MCG/KG	GCMSB:13 2/1/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	410	210	MCG/KG	GCMSB:13 2/1/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSB:13 2/1/94

REMARKS:

END OF REPORT

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. PAUL STECK

CTM PROJECT #: 94.02065

CTM Task #: 940204D

Purchase Order Number: 97-9300001
Date Sampled: 02/03/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S15-6'-7B
Location : SAPERSTON & DAY

CTM Sample No: 940204D 01
Date Received: 02/04/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	89.3		%	JD 2/7/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 2/4/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	190	MCG/KG	GCMSB:16 2/5/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	190	MCG/KG	GCMSB:16 2/5/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	380	MCG/KG	GCMSB:16 2/5/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	210	190	MCG/KG	GCMSB:16 2/5/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	190	MCG/KG	GCMSB:16 2/5/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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CTM PROJECT #: 94.02065

CTM Task #: 940204D

Attention: MR. PAUL STECK

Purchase Order Number: 97-9300001
Date Sampled: 02/03/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S16-4'-7W
Location : SAPERSTON & DAY

CTM Sample No: 940204D 02
Date Received: 02/04/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	87.1		%	JD 2/7/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 2/4/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	190	MCG/KG	GCMSB:16 2/5/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	190	MCG/KG	GCMSB:16 2/5/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	670	380	MCG/KG	GCMSB:16 2/5/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	190	MCG/KG	GCMSB:16 2/5/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	190	MCG/KG	GCMSB:16 2/5/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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CTM PROJECT #: 94.02065

CTM Task #: 940202B

Attention: MR. PAUL STECK

Purchase Order Number: 97-9300001
Date Sampled: 02/01/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S13-5'-8B
Location : SAPERSTON & DAY

CTM Sample No: 940202B 01
Date Received: 02/02/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	78.1		%	JD 2/3/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			DO 2/2/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSB:15 2/3/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSB:15 2/3/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	420	MCG/KG	GCMSB:15 2/3/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSB:15 2/3/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSB:15 2/3/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. PAUL STECK

CTM PROJECT #: 94.02065

CTM Task #: 940202B

Purchase Order Number: 97-9300001
Date Sampled: 02/01/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S14-3'8W
Location : SPAERSTON & DAY

CTM Sample No: 940202B 02
Date Received: 02/02/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	80.4		%	JD 2/3/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			DO 2/2/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	200	MCG/KG	GCMSB:15 2/3/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	200	MCG/KG	GCMSB:15 2/3/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	400	MCG/KG	GCMSB:15 2/3/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	200	MCG/KG	GCMSB:15 2/3/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	200	MCG/KG	GCMSB:15 2/3/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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CTM PROJECT #: 94.02065

CTM Task #: 940214A

Attention: MR. PAUL STECK

Purchase Order Number: 97-9300001
Date Sampled: 02/11/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S23-6'-9B
Location : SAPERSTON AND DAY

CTM Sample No: 940214A 01
Date Received: 02/14/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	85.5		%	JD 2/15/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 2/14/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	190	MCG/KG	GCMSD:36 2/15/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	190	MCG/KG	GCMSD:36 2/15/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	380	MCG/KG	GCMSD:36 2/15/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	190	MCG/KG	GCMSD:36 2/15/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	190	MCG/KG	GCMSD:36 2/15/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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CTM PROJECT #: 94.02065

CTM Task #: 940214A

Attention: MR. PAUL STECK

Purchase Order Number: 97-9300001
Date Sampled: 02/11/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S24-4'-9W
Location : SAPERSTON AND DAY

CTM Sample No: 940214A 02
Date Received: 02/14/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	77.0		%	LSM 2/16/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 2/14/94
ANILINE	**SW-846 METHOD** 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSD:36 2/15/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSD:36 2/15/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	440	MCG/KG	GCMSD:36 2/15/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSD:36 2/15/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSD:36 2/15/94

REMARKS:

END OF REPORT

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. PAUL STECK

CTM PROJECT #: 94.02065

CTM Task #: 940204D

Purchase Order Number: 97-9300001
Date Sampled: 02/03/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S17-6'10B
Location : SAPERSTON & DAY

CTM Sample No: 940204D 03
Date Received: 02/04/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	78.2		%	JD 2/7/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 2/4/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSB:16 2/5/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSB:16 2/5/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	540	420	MCG/KG	GCMSB:16 2/5/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSB:16 2/5/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSB:16 2/5/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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RUST ENV & INFRASTRUCTURE
495 COMMERCE DRIVE
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CTM PROJECT #: 94.02065

CTM Task #: 940204D

Attention: MR. PAUL STECK

Purchase Order Number: 97-9300001
Date Sampled: 02/03/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S18-4'-10W
Location : SAPERSTON & DAY

CTM Sample No: 940204D 04
Date Received: 02/04/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	75.4		%	JD 2/7/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 2/4/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSB:16 2/8/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSB:16 2/8/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	1,600	440	MCG/KG	GCMSB:16 2/8/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSB:16 2/8/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSB:16 2/8/94

REMARKS:

END OF REPORT

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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CTM PROJECT #: 94.02065

CTM Task #: 940211C

Attention: MR. PAUL STECK

Purchase Order Number: 97-9300001
Date Sampled: 02/10/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S21-7'-11B
Location : SAPERSTON & DAY

CTM Sample No: 940211C 01
Date Received: 02/11/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	78.8		%	JD 2/14/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 2/11/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSD:36 2/14/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSD:36 2/14/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	420	MCG/KG	GCMSD:36 2/14/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSD:36 2/14/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSD:36 2/14/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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CTM PROJECT #: 94.02065

CTM Task #: 940211C

Attention: MR. PAUL STECK

Purchase Order Number: 97-9300001
Date Sampled: 02/10/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S22-5'-11W
Location : SAPERSTON & DAY

CTM Sample No: 940211C 02
Date Received: 02/11/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	77.3		%	JD 2/14/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 2/11/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSD:36 2/14/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	220	MCG/KG	GCMSD:36 2/14/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	440	MCG/KG	GCMSD:36 2/14/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSD:36 2/14/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	220	MCG/KG	GCMSD:36 2/14/94

REMARKS:

END OF REPORT

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. PAUL STECK

CTM PROJECT #: 94.02065

CTM Task #: 940209M

Purchase Order Number: 97-9300001
Date Sampled: 02/08/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S19-6'-12B
Location : SAPERSTON & DAY

CTM Sample No: 940209M 01
Date Received: 02/09/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	85.7		%	JD 2/11/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 2/9/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	190	MCG/KG	GCMSD:36 2/14/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	190	MCG/KG	GCMSD:36 2/14/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	380	MCG/KG	GCMSD:36 2/14/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	190	MCG/KG	GCMSD:36 2/14/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	190	MCG/KG	GCMSD:36 2/14/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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CTM PROJECT #: 94.02065

CTM Task #: 940209M

Attention: MR. PAUL STECK

Purchase Order Number: 97-9300001
Date Sampled: 02/08/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-S20-4'12W
Location : SAPERSTON & DAY

CTM Sample No: 940209M 02
Date Received: 02/09/94
Collection Method: COMPOSITE
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	77.4		%	SP 2/11/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 2/9/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSD:36 2/14/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	210	MCG/KG	GCMSD:36 2/14/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	420	MCG/KG	GCMSD:36 2/14/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSD:36 2/14/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	210	MCG/KG	GCMSD:36 2/14/94

REMARKS:

END OF REPORT

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. DAVE ROWLINSON

CTM PROJECT #: 94.02065

CTM Task #: 940119E

Purchase Order Number: 97-9300001
Date Sampled: 01/18/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-BLANK-WI
Location : SAPERSTON & DAY

CTM Sample No: 940119E 01
Date Received: 01/19/94
Collection Method:
Matrix: WATER

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	5	MCG/L	GCMSB:15 2/3/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	5	MCG/L	GCMSB:15 2/3/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	10	MCG/L	GCMSB:15 2/3/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	5	MCG/L	GCMSB:15 2/3/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	5	MCG/L	GCMSB:15 2/3/94
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			MS 1/24/94

REMARKS:

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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CTM PROJECT #: 94.02065

CTM Task #: 940131K

Attention: MR. DAVE ROWLINSON

Purchase Order Number: 97-9300001
Date Sampled: 01/28/94 Time: 16:00
Sampled By : ROWLINSON
Sample Id: FOM-BLANK-W2
Location : SAPERSTON & DAY

CTM Sample No: 940131K 01
Date Received: 01/31/94
Collection Method: GRAB
Matrix: WATER

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			BM 1/31/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	5	MCG/L	GCMSD:51 3/4/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	5	MCG/L	GCMSD:51 3/4/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	10	MCG/L	GCMSD:51 3/4/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	5	MCG/L	GCMSD:51 3/4/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	5	MCG/L	GCMSD:51 3/4/94

REMARKS:

END OF REPORT

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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CTM PROJECT #: 94.02065

CTM Task #: 940204E

Attention: MR. PAUL STECK

Purchase Order Number: 97-9300001
Date Sampled: 02/03/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-BLANK-W3
Location : SAPERSTON & DAY

CTM Sample No: 940204E 01
Date Received: 02/04/94
Collection Method: COMPOSITE
Matrix: WATER

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			BM 2/9/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	5	MCG/L	GCMSD:51 3/4/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	5	MCG/L	GCMSD:51 3/4/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	10	MCG/L	GCMSD:51 3/4/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	5	MCG/L	GCMSD:51 3/4/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	5	MCG/L	GCMSD:51 3/4/94

REMARKS:

END OF REPORT

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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CTM PROJECT #: 94.02065

CTM Task #: 940214B

Attention: MR. PAUL STECK

Purchase Order Number: 97-9300001
Date Sampled: 02/11/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-W4-BLANK
Location : SAPERSTON AND DAY

CTM Sample No: 940214B 01
Date Received: 02/14/94
Collection Method: COMPOSITE
Matrix: WATER

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
B/N EXTRACTION SW 846 3500	BASE/NEUTRALS	COMPLETED			BM 2/17/94
ANILINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	5	MCG/L	GCMSD:51 3/4/94
DIPHENYLAMINE	SW-846 METHOD 8270 BASE NEUTRALS	ND	5	MCG/L	GCMSD:51 3/4/94
2-MERCAPTOBENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	10	MCG/L	GCMSD:51 3/4/94
BENZOTHIAZOLE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	5	MCG/L	GCMSD:51 3/4/94
PHENOTHIAZINE	SW-846 METHOD 8270 BASE/NEUTRALS	ND	5	MCG/L	GCMSD:51 3/4/94

REMARKS:

END OF REPORT

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

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Attention: MR. DAVE ROWLINSON

CTM PROJECT #: 94.02065

CTM Task #: 940126E

Purchase Order Number: 97-9300103
Date Sampled: 01/25/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-RED-WASTE/ S&D
Location : UNKNOWN

CTM Sample No: 940126E 01
Date Received: 01/26/94
Collection Method: GRAB
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
% SOLIDS	CLP SOW 4/89	96.6		%	SP 2/1/94
TCLP BASE/NEUTRALS	SW-846 METHOD 8270 BASE/NEUTRALS	COMPLETED			BB 2/8/94
TCLP EXTRACTION	SW-846 METHOD 1311	COMPLETED			D15:29 1/26/94
EXTRACTION FOR TCLP B/N	SW-846 METHOD 8270	COMPLETED			BM 1/31/94
HEXACHLOROBENZENE (TCLP)	SW-846 METHOD 8270 BASE/NEUTRALS	ND	20	MCG/L	GCMSD:25 2/8/94
HEXACHLOROBUTADIENE (TCLP)	SW-846 METHOD 8270 BASE/NEUTRALS	ND	20	MCG/L	GCMSD:25 2/8/94
PYRIDINE (TCLP)	SW-846 METHOD 8270 BASE/NEUTRALS	ND	20	MCG/L	GCMSD:25 2/8/94
2,4-DINITROTOLUENE (TCLP)	SW-846 METHOD 8270 BASE/NEUTRALS	ND	20	MCG/L	GCMSD:25 2/8/94
HEXACHLOROETHANE (TCLP)	SW-846 METHOD 8270 BASE/NEUTRALS	ND	20	MCG/L	GCMSD:25 2/8/94
NITROBENZENE (TCLP)	SW-846 METHOD 8270 BASE/NEUTRALS	ND	20	MCG/L	GCMSD:25 2/8/94
1,4-DICHLOROBENZENE (TCLP)	SW-846 METHOD 8270 BASE/NEUTRALS	ND	20	MCG/L	GCMSD:25 2/8/94
TCLP ACID EXTRACTABLES	SW-846 METHOD 8270	COMPLETED			BB 2/8/94
EXTRACTION FOR TCLP ACID/EXT.	SW-846 METHOD 8270	COMPLETED			BM 1/31/94
O-CRESOL (TCLP)	SW-846 METHOD 8270 ACID FRACTION	4,000	1,000	MCG/L	GCMSD:25 2/8/94
PENTACHLOROPHENOL (TCLP)	SW-846 METHOD 8270 ACID FRACTION	ND	100	MCG/L	GCMSD:25 2/8/94
2,4,5-TRICHLOROPHENOL (TCLP)	SW-846 METHOD 8270 ACID FRACTION	ND	100	MCG/L	GCMSD:25 2/8/94
2,4,6-TRICHLOROPHENOL (TCLP)	SW-846 METHOD 8270 ACID FRACTION	ND	20	MCG/L	GCMSD:25 2/8/94
M & P CRESOL (TCLP)	SW-846 METHOD 8270 ACID FRACTION	2,200	1,000	MCG/L	GCMSD:25 2/8/94
TCLP VOLATILES	SW-846 METHOD 8240	COMPLETED			KM 2/3/94
ZERO HEADSPACE EXTRACTION	SW-846 METHOD 1311	COMPLETED			DO 1/26/94
PURGE & TRAP EXTRACTION	SW-846 METHOD 5030	COMPLETED			KM 2/3/94
METHANOL EXTRACTION	SW-846 METHOD 5030	COMPLETED			KM 2/3/94
BENZENE (TCLP)	SW-846 METHOD 8240	ND	250	MCG/L	CMS:21 2/4/94
CARBON TETRACHLORIDE (TCLP)	SW-846 METHOD 8240	ND	250	MCG/L	CMS:21 2/4/94
CHLOROBENZENE (TCLP)	SW-846 METHOD 8240	ND	250	MCG/L	CMS:21 2/4/94
CHLOROFORM (TCLP)	SW-846 METHOD 8240	ND	250	MCG/L	CMS:21 2/4/94
1,4-DICHLOROBENZENE (TCLP)	SW-846 METHOD 8240	ND	250	MCG/L	CMS:21 2/4/94
1,2-DICHLOROETHANE (TCLP)	SW-846 METHOD 8240	ND	250	MCG/L	CMS:21 2/4/94
1,1-DICHLOROETHYLENE (TCLP)	SW-846 METHOD 8240	ND	250	MCG/L	CMS:21 2/4/94
METHYL ETHYL KETONE (TCLP)	SW-846 METHOD 8240	19,000	1,000	MCG/L	CMS:21 2/3/94
TETRACHLOROETHYLENE (TCLP)	SW-846 METHOD 8240	ND	250	MCG/L	CMS:21 2/4/94
TRICHLOROETHYLENE (TCLP)	SW-846 METHOD 8240	ND	250	MCG/L	CMS:21 2/4/94

(CONTINUES ON NEXT PAGE)

REMARKS:

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CTM PROJECT #: 94.02065

CTM Task #: 940126E

Attention: MR. DAVE ROWLINSON

Purchase Order Number: 97-9300103
Date Sampled: 01/25/94 Time: 4:00PM
Sampled By : ROWLINSON
Sample Id: FOM-RED-WASTE/ S&D
Location : UNKNOWN

CTM Sample No: 940126E 01
Date Received: 01/26/94
Collection Method: GRAB
Matrix: SOIL

Parameters and Standard Methodology Used		Results	PQL	Unit	Analyst Reference
	(CONTINUED FROM PREVIOUS PAGE)				
VINYL CHLORIDE (TCLP)	SW-846 METHOD 8240	ND	500	MCG/L	CMS:21 2/4/94
ARSENIC, BY TCLP	SW-846 METHOD 1311	0.003	0.002	MG/L	HES 2/14/94
BARIUM, BY TCLP	SW-846 METHOD 1311	0.3	0.2	MG/L	HES 2/14/94
CADMIUM, BY TCLP	SW-846 METHOD 1311	ND	0.02	MG/L	HES 2/14/94
CHROMIUM, BY TCLP	SW-846 METHOD 1311	ND	0.05	MG/L	HES 2/14/94
LEAD, BY TCLP	SW-846 METHOD 1311	ND	0.1	MG/L	HES 2/14/94
MERCURY, BY TCLP	SW-846 METHOD 1311	ND	0.0002	MG/L	E-2:63 1/28/94
SELENIUM, BY TCLP	SW-846 METHOD 1311	ND	0.002	MG/L	HES 2/14/94
SILVER, BY TCLP	SW-846 METHOD 1311	ND	0.02	MG/L	HES 2/14/94
MERCURY PREPARATION - TCLP	SW-846 METHOD 1311	COMPLETED			D15:30 1/27/94
ACID DIGESTION ON TCLP EXTRACT	SW-846 3010	COMPLETED			D15:31 1/28/94
PH	EPA 1983 150.1	7.9SU			LSM 2/1/94
CORROSIVITY	EPA,EVAL.SOLID WASTE,1980.40 CFR 261.22	NON-CORROSS			LSM 2/1/94
IGNITABILITY	EPA METHOD-1010	>200	70	oF	LSM 2/2/94
REACTIVE CYANIDE	SW-846 METHOD 7.3.3.2	(2) *			JD 2/3/94
REACTIVE SULFIDE	SW-846 METHOD 7.3.4.2	ND	1.4	MG/KG	LSM A:54 1/28/94
TCLP PESTICIDES/HERBICIDES	SW-846 METHODS 8080/8150	COMPLETED			LT 2/2/94
EXTRACTION FOR TCLP HERBICIDES	SW-846 METHOD 8150	COMPLETED			BM 1/31/94
EXTRACTION FOR TCLP PESTICIDES	SW-846 METHOD 8080	COMPLETED			DO 1/28/94
CHLORDANE (TCLP)	SW-846 METHOD 8080	ND	2.0	MCG/L	GC4A-010 2/2/94
ENDRIN (TCLP)	SW-846 METHOD 8080	ND	0.20	MCG/L	GC4A-010 2/2/94
HEPTACHLOR (TCLP)	SW-846 METHOD 8080	ND	0.20	MCG/L	GC4A-010 2/2/94
LINDANE (TCLP)	SW-846 METHOD 8080	ND	0.20	MCG/L	GC4A-010 2/2/94
METHOXYCHLOR (TCLP)	SW-846 METHOD 8080	ND	0.20	MCG/L	GC4A-010 2/2/94
TOXAPHENE (TCLP)	SW-846 METHOD 8080	ND	4.0	MCG/L	GC4A-010 2/2/94
HEPTACHLOR EPOXIDE (TCLP)	SW-846 METHOD 8080	ND	0.20	MCG/L	GC4A-010 2/2/94
2,4-D (TCLP)	SW-846 METHOD 8150	ND	0.20	MCG/L	GC4A:011 2/2/94
2,4,5-TP (SILVEX) (TCLP)	SW-846 METHOD 8150	ND	0.20	MCG/L	GC4A:011 2/2/94

REMARKS: (2) The concentration of total cyanide for this sample is less than 100 mg/kg. This is well below the reactive cyanide regulatory level of 250 mg/kg. A reactive cyanide analysis is not necessary.

END OF REPORT

LEGEND: MG/KG=PPM, MCG/KG=PPB, MG/L=PPM, MCG/L=PPB, MCG/G=PPM

HUDSON ENVIRONMENTAL SERVICES, INC.
248 Queensbury Ave., P.O. Box 4601
Queensbury, New York 12804
518/792-3863

CLIENT: CTM Analytical Laboratories

SAMPLE DESCRIPTION: 940214CM 01

LOCATION: Not Specified

H.E.S. #: 940214B01

DATE SAMPLED: 01/25/94

DATE SAMPLE RECD: 02/14/94

MATRIX: Digestate

TYPE SAMPLE: Not Specified

SAMPLER: Client

PARAMETER	METHOD	RESULT	UNITS	TEST DATE
Arsenic	SW846-7060	0.003	mg/l	02/14/94
Barium	SW846-7080	0.3	mg/l	02/14/94
Cadmium	SW846-7130	<0.02	mg/l	02/14/94
Chromium	SW846-7190	<0.05	mg/l	02/14/94
Lead	SW846-7420	<0.1	mg/l	02/14/94
Selenium	SW846-7740	<0.002	mg/l	02/14/94
Silver	SW846-7760	<0.02	mg/l	02/14/94

CTM Analytical Laboratories, Ltd.

15 Century Hill Drive
P.O. Box 727
Latham, NY 12110
518-786-7100
FAX 518-786-7139

GC/MS
GC
ICAP
Sampling Services

Laboratory Analysis Report
Prepared for: RUST ENV & INFRASTRUCTURE
Project Number: 94.02065
Task Number: 940117A
20 JAN 1994

IMPORTANT - PLEASE NOTE

1. All results are calculated on a dry weight basis unless otherwise specified.
2. PQL = Practical Quantitation Limit.
3. A result with a "D" means that the result was "Detected" below the Practical Quantitation Limit (PQL), but above the Method Detection Limit (MDL).
4. ND = Not Detected at or above the PQL.
5. NTP = Non-target peaks (1-5 peaks).
   MNTP = Many non-target peaks (5+ peaks).
6. pH results not performed in the field should be considered estimated since the holding time is 15 minutes from the sampling time.
7. If the samples are collected independently of our laboratory, CTM is not responsible for the possible contamination during the sampling procedure.

AUTHORIZED FOR RELEASE:

CERTIFICATIONS:
NYS E.L.A.P. ID NO: 10358 MA: NY052 CT: PH-0551 NJ: 73581 PA: 68-402

Appendix B

Real Time Air Monitoring Logs

DAILY SAFETY LOG

Date: 1/11/94 Project Factory Outlet Mall

Site Entrance: 7:00 AM hrs Exit: 5:00 PM hrs

Site Safety Officer: D. Rowlinson

Crew: see sign in sheet

Summary of Work Performed On-Site:

Started Excavation on Cell #1

Summary of Air Monitoring Results:

- No HNu Readings, very windy; 20 mph
- Particulates not monitored; however may order a meter due to some dust being generated

Level of Protective Clothing being Worn by Persons On-Site:

Level D

Other: Air Pump Setup Samples Collected, A2, A3, A

SITE SAFETY OFFICER David Rowlinson
Signature

DAILY SAFETY LOG

Date: 1/12/94 Project Factory Outlet Mall

Site Entrance: 7:00 AM hrs Exit: 5:00 PM hrs

Site Safety Officer: D.

Crew: see sign in sheet

Summary of Work Performed On-Site:

Completed cell #1 Excavation Started cell #4

Summary of Air Monitoring Results:

No H/No Readings 0-5 mph wind 30°F

Particulate Meter read 0.0 particles

Level of Protective Clothing being Worn by Persons On-Site:

Level D very little odor present

Other:

SITE SAFETY OFFICER D. Townsend

Signature

DAILY SAFETY LOG

Date: 1/13/94 Project Fox Town Outlet Mall

Site Entrance: 7:00 AM hrs Exit: 5:00 PM hrs

Site Safety Officer: D. Rowlinson

Crew: see sign in sheet

Summary of Work Performed On-Site:

Cell #4 excavation proceeded to Catch Basin and storm sewer. Cell #2 started

Summary of Air Monitoring Results:

No HNu Readings 0-5 mph NE 30°F
Particulate Meter reading 0.09

Level of Protective Clothing being Worn by Persons On-Site:

Level D odors present, Equipment and personnel told to stay upwind of excavation which was adhered to

Other: Air Samples Collected A5, A6 & A7

SITE SAFETY OFFICER David Rowlinson
Signature

DAILY SAFETY LOG

Date: 1/14/94 Project Factory Outlet Mall

Site Entrance: 7:00 hrs Exit: 5:00 PM hrs

Site Safety Officer: D. Rowlinson

Crew: see sign in sheet

Summary of Work Performed On-Site:

Cell #2 Excavated

Summary of Air Monitoring Results:

No H&V Readings

Level of Protective Clothing being Worn by Persons On-Site:

Level D ~~H~~ Odors were minor

Informed personnel about white powder containing Vinyle chloride

Other:

SITE SAFETY OFFICER David Rowlinson

Signature

DAILY SAFETY LOG

Date: 1/17/94 Project Factory Outlet Mall

Site Entrance: 7:00 Am hrs Exit: 5:00 Pm hrs

Site Safety Officer: D. Robinson

Crew: see sign in sheet

Summary of Work Performed On-Site:

Cell #2 Excavated

Summary of Air Monitoring Results:

No HNu Readings

Level of Protective Clothing being Worn by Persons On-Site:

Level D Mild odor reported. All personnel tried to stay upwind of excavation as much as possible

Other: Safety Meeting 7:00 Am All Site personnel and drivers informed of hazards & odor and to stay upwind as much as poss.

SITE SAFETY OFFICER D. Robinson

Signature

DAILY SAFETY LOG

Date: 1/18/94 Project Factory Outlet Mall

Site Entrance: 7:00 A hrs Exit: 5:00 P hrs

Site Safety Officer: D. Rankin

Crew: see sign in sheet

Summary of Work Performed On-Site:

Cell #2 Excavated

Summary of Air Monitoring Results:

2 ppm in white powder waste

Very little dust generated

Level of Protective Clothing being Worn by Persons On-Site:

Level D Minimal odor; High Winds wind chill at -30° F

Other:

SITE SAFETY OFFICER David Rankin
Signature

DAILY SAFETY LOG

Date: 1/19/94 Project Factory Outlet Mall

Site Entrance: 7:00 AM hrs Exit: 5:00 PM hrs

Site Safety Officer: D. Rowlinson

Crew: see sign in sheet

Summary of Work Performed On-Site:

Cell #3 excavated

Summary of Air Monitoring Results:

Blkgd on HNu

very high winds, extreme chill factor

Level of Protective Clothing being Worn by Persons On-Site:

Level D No odors in cab of equipment

Odors present downwind however all equipment and personnel worked upwind of

Other: waste excavated

SITE SAFETY OFFICER David Rowlinson

Signature

DAILY SAFETY LOG

Date: 1/20/94 Project Factory Outlet Mall

Site Entrance: 7:00 hrs Exit: 5:00 Pm hrs

Site Safety Officer: D. Rawlinson

Crew: see sign in sheet

Summary of Work Performed On-Site:

Cell #3, 4 & 5 Excavated

Summary of Air Monitoring Results:

Blgd on HW

cold - wind chill factor below zero

Level of Protective Clothing being Worn by Persons On-Site:

Level D Slight odors in white powder next to storm sewer. Personnel told if winds shift to go to Level C, Windy today kept odors away from upwind equipment &

Other: Trucks

SITE SAFETY OFFICER D. Rawlinson
Signature

DAILY SAFETY LOG

Date: 1/21/94 Project Factory Outlet Mall

Site Entrance: 10:00 hrs Exit: 5:50 hrs

Site Safety Officer: D. Robinson

Crew: all main in sheet

Summary of Work Performed On-Site:

Cell #3 Excavated along perimeter fence

Summary of Air Monitoring Results:

BZ/GD HNu

high winds cwind noted from below zero

Level of Protective Clothing being Worn by Persons On-Site:

Level D digging minor odors encountered

Other:

SITE SAFETY OFFICER David Robinson
Signature

Date: 1/24/94 Project Factory Outlet Mall

Site Entrance: 7:00 hrs Exit: 5:00 pm hrs

Site Safety Officer: D. Rowlinson

Crew: all sign in sheet

Summary of Work Performed On-Site:

Cell #3, 4 & 5 worked on

Summary of Air Monitoring Results:

BKGD HNu : White powder dusting Site

Level of Protective Clothing being Worn by Persons On-Site:

Level C 50% of time when dust was a problem. Powder was mixed with soil to keep down the dust

Other: Hasley drop in operator also in Level C

SITE SAFETY OFFICER David Rowlinson
Signature

DAILY SAFETY LOG

Date: 1/25/94 Project Factory Outlet Mall

Site Entrance: 7:00 Am hrs Exit: 5:00 Pm hrs

Site Safety Officer: D. Rawlinson

Crew: see sign in sheet

Summary of Work Performed On-Site:

Cell 3, 4, 5 & 6

Summary of Air Monitoring Results:

HNu detected 15 ppm in excavation, however bkgd in breathing zone

white powder dusting site toward down pad. Vinyl Chloride dragger tube was used - ND

Level of Protective Clothing being Worn by Persons On-Site:

Level C most of the day for Excavator operator and decon laborer. NW winds shifted from SE from past several days. Odor & dust moving into operators direction. Truck drivers told to stay in cabs and keep windows rolled up to prevent dust from entering their cabs. Most drivers were not in violation of this request.

Other:

SITE SAFETY OFFICER David Rawlinson

Signature

DAILY SAFETY LOG

Date: 1/26/94 Project Factory Outlet Mall Reroof

Site Entrance: 7:10 a.m. hrs Exit: 5:00 pm hrs

Site Safety Officer: P. Steck

Crew: See Sign in sheet.

Summary of Work Performed On-Site:

Excavated Cells 5 & 6

Summary of Air Monitoring Results:

HNU readings were background in excavation, breathing zone and perimeter; however, odors were noted w/in excavation. White powder encountered along western face w/ wind blowing to the west

Level of Protective Clothing being Worn by Persons On-Site:

Level C was used all day by the track excavator, and Decon laborer, and more than ½ the day by backhoe operator. Very cold w/ severe wind chill. winds from E → W @ approx 25 mph Drivers Stayed in trucks w/ window rolled up.

Other:

SITE SAFETY OFFICER Paul C Steck

Signature

DAILY SAFETY LOG

Date: 1/27/94 Project Factory Outlet Mall

Site Entrance: 7:00 hrs Exit: 5:00 hrs

Site Safety Officer: D. Rowlinson

Crew: see sign in sheet

Summary of Work Performed On-Site:

Excavated Cell 6 & 7

Summary of Air Monitoring Results:

AM readings were background, Odors present. white powder creating dust several times during day. Operator, Foreman, drivers informed of dust and to upgrade to Level C. They responded and upgraded.

Level of Protective Clothing being Worn by Persons On-Site:

Level C was used all day by operator & dozer laborer, backoperator was occasional since he was operating side gradient from the active excavation. Winds were 5 mph NE into the excavator face.

Other:

Ambient sample collected as a high risk in the cab of David Lester's (Form-A20-DL-1-27-94) Vinyle Chloride tube collected and was ND.

SITE SAFETY OFFICER David Rowlinson

Signature

DAILY SAFETY LOG

Date: 1/28/94 Project Factory Outlet Mall

Site Entrance: 7:00 hrs Exit: 5:00 hrs

Site Safety Officer: D. Rowbotham

Crew: Excavated Cell 8

All sign on sheet

Summary of Work Performed On-Site:

Summary of Air Monitoring Results:

H/C Bleep all day

Level of Protective Clothing being Worn by Persons On-Site:

Level C during excavation on large excavator

Powder was a problem. DEC wanted tarps on dumps however drivers had to walk thru waste to untarp tarps

Other: Clean soil was put on top of bad until DEC was satisfied with this solution

SITE SAFETY OFFICER D. Rowbotham
Signature

DAILY SAFETY LOG

Date: 1/31/94 Project Factory Outlet Mall

Site Entrance: 7:00 AM hrs Exit: 5:00 PM hrs

Site Safety Officer: D. Rowlinson

Crew: see sign sheet

Summary of Work Performed On-Site:

Excavated Cell #8 and side walls of cell 3 & 4

Summary of Air Monitoring Results:

H_2S = BKGD wind at 5-10 mph. White powder encountered very little, Dust minimal

Level of Protective Clothing being Worn by Persons On-Site:

Level C on excavator & down pad odors were present. Informed Aron, Bendixen, of H_2S beyond of the site

Other:

SITE SAFETY OFFICER D. Rowlinson
Signature

DAILY SAFETY LOG

Date: 2/1/94 Project Factory Outlet Mall

Site Entrance: 7:00 A hrs Exit: 5:00 P hrs

Site Safety Officer: D.

Crew: see sign - sheet

Summary of Work Performed On-Site:

Excavated Cell #10 near fence

Summary of Air Monitoring Results:

HNu Blood ; except red resin drums 2-3 encounter 10 ppm on meter

Particulates not a concern near road, since white powder was more granular than

Level of Protective Clothing being Worn by Persons On-Site:

Level C by excavator, decon and overwatch. Odors present and personnel operating and overseeing were down wind.

Other:

SITE SAFETY OFFICER D. Rowlinson
Signature

DAILY SAFETY LOG

Date: 2/2/94 Project Factory Outlet Mall

Site Entrance: 7:30A hrs Exit: 5:00 Pm hrs

Site Safety Officer: D. Rowlinson

Crew: see sign in sheet

Summary of Work Performed On-Site:

Excavated 10, 12, 7 cells

Summary of Air Monitoring Results:

HNu = B/CO . Odors present and some white powder

Air Samples Collected

Level of Protective Clothing being Worn by Persons On-Site:

Level C downwind of excavation

dozer, oversight, excavator and Hydrosys operator

on Respirators

Other:

SITE SAFETY OFFICER D. Rowlinson

Signature

DAILY SAFETY LOG

Date: 2/3/94 Project Factory Outlet Mall

Site Entrance: 7:00 AM hrs Exit: 5:00 PM hrs

Site Safety Officer: D. Rowlinson

Crew: see sign in Sheet

Summary of Work Performed On-Site:

Excavated 7 E'10

Summary of Air Monitoring Results:

HNu B/GRD Odors present

Air Samples Collected

Level of Protective Clothing being Worn by Persons On-Site:

Level C downgrad of excavation

Excavator

Oversight

Dean Labor

Other: Hauling off-Site

SITE SAFETY OFFICER David Rowlinson
Signature

DAILY SAFETY LOG

Date: 2/4/94 Project Factory Outlet Mall

Site Entrance: 7:00 hrs Exit: 5:00 hrs

Site Safety Officer: D Anderson

Crew: all on sign in sheet

Summary of Work Performed On-Site:

Excavated 10 ft/12

Summary of Air Monitoring Results:

H/N = BK GD Odors present

Level of Protective Clothing being Worn by Persons On-Site:

Level C downgraded
in Excavation
due
to oversight
Hazelton off Site

Other:

SITE SAFETY OFFICER D Anderson
Signature

DAILY SAFETY LOG

Date: 2/7/94 Project Fashion Outlet Mall

Site Entrance: 7:00 hrs Exit: 3:00 hrs

Site Safety Officer: _____

Crew: see myr + sheet

Summary of Work Performed On-Site:

Excavated cell 12 onto side area

Summary of Air Monitoring Results:

H/W = B/G'D odors present only resin

Level of Protective Clothing being Worn by Persons On-Site:

Level C on excavation dress

Other: _____

SITE SAFETY OFFICER _____
Signature

DAILY SAFETY LOG

Date: 2/8/94 Project Factory Outlet Mall

Site Entrance: 7:00 AM hrs Exit: 5:00 PM hrs

Site Safety Officer: D. Rawlinson

Crew: see sign in sheet

Summary of Work Performed On-Site:

Excavation Cell 12

Summary of Air Monitoring Results:

H_2S = BKGD

Level of Protective Clothing being Worn by Persons On-Site:

Level C worn by excavator, slip strippers, weight and decon. other present only when excavating

Other:

SITE SAFETY OFFICER David Rawlinson

Signature

Appendix C

Waste Stream Disposal Correspondence

IRM REMOVAL ACTION
Vacant Land Adjacent to 1865 Connecting Road
Daily Disposal of Waste Quantities

DATE	DAILY LOADS OF WASTE LEAVING SITE	DAILY QUANTITY (Tons)
11-Jan-94	19	378.95
12-Jan-94	29	640.66
13-Jan-94	26	526.90
14-Jan-94	27	592.77
17-Jan-94	22	434.48
18-Jan-94	20	411.75
19-Jan-94	24	468.81
20-Jan-94	12	238.94
21-Jan-94	17	359.27
24-Jan-94	25	563.78
25-Jan-94	28	609.19
26-Jan-94	33	663.41
27-Jan-94	28	574.34
28-Jan-94	22	464.03
31-Jan-94	19	387.98
1-Feb-94	28	639.64
2-Feb-94	36	716.61
3-Feb-94	22	486.77
4-Feb-94	27	569.63
7-Feb-94	16	348.96
8-Feb-94	27	632.25
9-Feb-94	29	672.95
10-Feb-94	30	687.01
11-Feb-94	31	713.40
15-Feb-94	4	91.45
23-Feb-94	1	4.58

TOTAL QUANTITY DISPOSED **12878.51 Tons**

RUST ENVIRONMENT & INFRASTRUCTURE

Formerly DUNN Corporation

RUST Environment & Infrastructure Inc.
495 Commerce Drive
Amherst, NY 14228
Tel. (716) 691-3866 • FAX (716) 691-3884

March 1, 1994

Mr. Bill Andris
Benderson Development Company
570 Delaware Avenue
Buffalo, NY 14202

Subject: **Vacant Land Adjacent to 1865 Connecting Road**
IRM Removal Action
Final Quantities

Dear Mr. Andris:

In regards to our letter of February 22, 1994 to Modern Environmental concerning Final Site Inspection, all listed final inspection work items have been completed to the satisfaction of the undersigned after a Site visit was conducted on March 1, 1994. The following Bid Item quantities have been accepted and verified.

BID ITEM #	DESCRIPTION	ACTUAL QUANTITIES
1	Site Preparation	1
2	Waste Disposal	12,878.5 tons
3	Water Disposal	7,326.1 gallon
4	Project Closeout	1
7	Health and Safety	1

If you have any questions, please call the undersigned at 716/691-3866.

Very truly yours,

RUST ENVIRONMENT
& INFRASTRUCTURE

David E. Rowlinson
Project Manager

cc: Eric Recoon, Esq. - Benderson
Craig Slater, Esq. - Saperston & Day
Jerry Plewniak - Modern
John B. Berry

der/plewniak.ltr

New York State Department of Environmental Conservation
270 Michigan Avenue, Buffalo, 14203-2999

Thomas C. Jorling
Commissioner

January 10, 1994

Mr. Michael Gullo
General Manager
Modern Landfill, Inc.
P.O. Box 209
Model City, New York 14107-0209

Dear Mr. Gullo:

BENDERSON DEVELOPMENT: M93-0415

The Department has reviewed the above referenced application for Treatment or Disposal of An Industrial Waste Stream (Form 47-19-7). Based on the data provided, the material is acceptable for disposal at Modern Landfill, Inc. with the following conditions:

1. Pit must be excavated for waste placement.

2. Waste placed in pit must be covered at once.

In the event that significant changes in the information presented on this application occurs, you shall immediately notify this Department in writing. Such changes shall include, but are not limited to changes in: process, facility name or address, waste composition and/or hauler.

Enclosed is a copy of the approved application. If you have any questions, please contact this office at 716/851-7220.

Very truly yours,

Mark J. Hans, P.E.
Regional Solid Waste Engineer

MJH:lej

cc: Mr. Glenn May

Enclosure

32N30 M93-0415

APPLICATION FOR TREATMENT OR DISPOSAL OF AN INDUSTRIAL WASTE STREAM

SEE APPLICATION INSTRUCTIONS ON REVERSE SIDE

MJP 11/10/94

1. NAME OF PROJECT/FACILITY	2. COUNTY	3. SITE NUMBER
MODERN LANDFILL INC	NIAGARA	32N30
4. NAME OF OWNER	**5. ADDRESS (Street, City, State, Zip Code)**	**6. TELEPHONE NO.**
MODERN LANDFILL INC	4766 MODEL CITY RD. MODEL CITY, NY	(716)754-8226
7. NAME OF OPERATOR	**8. ADDRESS (Street, City, State, Zip Code)**	**9. TELEPHONE NO.**
RICHARD WASEUTA	FLETCHER & BAROLE RD. MODEL CITY, NY 14107	(716)754-8226

10. METHOD OF TREATMENT OR DISPOSAL

SANITARY LANDFILL - D90

11. COMPANY GENERATING WASTE		
NIAGARA COUNTY INDUSTRIAL DEVELOPMENT AGENCY 59 PARK AVENUE, LOCKPORT, NY 14094		
11a. REPRESENTATIVE OF WASTE GENERATOR	**11b. MAILING ADDRESS OF REPRESENTATIVE**	**11c. TELEPHONE NO.**
DARYL RICHARDSON	681 TOWNPOST DRIVE, AMHERST, NY 14228	716-691-3846

12. DESCRIPTION OF PROCESS PRODUCING WASTE

REMEDIAL ACTION CLEANUP

13. EXPECTED ANNUAL WASTE PRODUCTION	14. WASTE HAULED IN
± 6000 Tons/Year ____ Cubic Yards	☐ Drums ☐ Bulk Tank ☒ Bulker Container ☐ Other

15. WASTE COMPOSITION	15b. Physical State	15c. pH Range
15a. Average Percent Solids 100	☐ Liquid ☐ Slurry ☐ Sludge ☒ Solid ☐ Contained Gas	7.5 to 8.6

16.	CONSTITUENTS	CONCENTRATION (If Known) Upper	Lower	Typical	Unit (Check one) Wt %	PPM
a)	ANILINE T L U 2 PPM			0.26	☐	☐
b)	DIPHENYLAMINE			0.34	☐	☐
c)	2-MERCAPTOBENZOTHIAZOLE			0.55	☐	☐
d)	BENZOTHIAZOLE			0.01	☐	☐

17. IS AN ANALYSIS OF WASTE ATTACHED	18. WAS AN EP TOXICITY TEST CONDUCTED ON THE WASTE?	19. MATERIAL IS
☒ Yes ☐ No	☒ Yes ☐ No If "Yes", attach results	☐ Hazardous ☒ Non-Hazardous

20. OTHER ALL HAZARDS AND HANDLING PROBLEMS ASSOCIATED WITH THE WASTE (Incompatibility, Handling, Containment and Disposal Restrictions)

Health and safety concerns are addressed in the Health and Safety Plan as referenced in the Interim Remedial Measures (IRM) Removal Action Plan dated September, 1993.

21. WHERE WAS MATERIAL DISPOSED OR RECYCLED?

NO

22. NAME OF WASTE TRANSPORTER	23. ADDRESS (Street, City, State, Zip Code)	24. NYSDEC PERMIT NO.	25. TELEPHONE NO.
MODERN DISPOSAL SERVICES	4746 MODEL CITY ROAD	9A-073	716-754-8226

26. CERTIFICATION

I hereby affirm under penalty of perjury that information provided on this form and attached statements and exhibits is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

27. SIGNATURE AND TITLE OF REPRESENTATIVE OF WASTE GENERATOR	DATE
X [signature] NIDA/Executive Director	12/27/93
28. SIGNATURE AND TITLE OF REPRESENTATIVE OF TREATMENT OR DISPOSAL FACILITY	**DATE**
X Michael Imbalzano / General Manager	01/04/94

ew York State Department of Environmental Conservation
0 Michigan Avenue, Buffalo, New York, 14203-2999

Thomas C. Jorling
Commissioner

MEMORANDUM

TO: Mr. Anthony Lopes, Division of Solid Waste

FROM: Mr. Kevin Glaser, Division of Haz. Waste Remediation GMM for KG.

SUBJECT: 1865 Connecting Road/Factory Outlet Mall - Drum Disposal

DATE: February 10, 1994

This memo is to confirm the placement of 27 drums from the above mentioned site in the Modern Disposal Landfill on February 9, 1994. These drums of waste were generated during the Preliminary Investigation of the site. These drums contain boring cuttings, Personal Protective Equipment and frozen decontamination water from equipment used during this investigation. These drums were NOT from the excavation of wastes onsite, further discussion of the excavated drums will follow this memo.

The 27 drums were transported on Modern truck #499, at approximately 1:30 PM, February 9, 1994 and disposed of at the working face of the landfill in a pit dug specifically for these wastes. The writer accompanied this shipment to verify their disposal.

If you have any further questions regarding these drums or this site, please contact myself or the Project Manager, Glenn May.

cc: Mr. Glenn May, NYSDEC, Div. Haz. Waste Rem.
Mr. David Rowlinson, RUST Environmental
Mr. Michael Gullo, Modern Disposal
Mr. Michael Young, Modern Disposal

MODERN LANDFILL INC.

January 26, 1993

Mr. Anthony Lopes
NYS DEC
270 Delaware Avenue
Buffalo, NY 14203

Re: Benderson Development
Application # M93-0415
Remedial Action Cleanup

Dear Mr. Lopes:

As per our telephone conversation the amount of material generated from the above referenced site has increased substantially primarily due to the additional areas requiring cleanup. These extra areas designated for disposal have been classified and properly tested as referenced in the Interim Remedial Measures Plan dated September 8, 1993.

Therefore, our office requests the annual waste production be amended to read 12,000 tons. All other existing conditions on this application remain the same. Hence, as agreed in our conversation, Modern Landfill, Inc. will continue to accept this waste stream under the conditions set forth in this application. Unless your department has any further stipulation, our office will modify our application to note this change.

If you should have any questions, please contact me at (716) 754-8226, ext. 216.

Sincerely,

Michael W. Gullo
General Manager

MG/jg

cc: Gary Smith

RUST ENVIRONMENT & INFRASTRUCTURE

Formerly DUNN Corporation

RUST Environment & Infrastructure Inc.
495 Commerce Drive
Amherst, NY 14228
Tel. (716) 691-3866 • FAX (716) 691-3884

February 14, 1994

Mr. Michael Gullo
Modern Environmental Group, Inc.
4746 Model City Road
P.O. Box 209
Model City, New York 14107-0209

Subject: **Vacant Land Adjacent to 1865 Connecting Road**
IRM Removal Action
Application # M93-0415

Dear Mr. Gullo:

In response to our telephone conversation of February 10, 1994, the amount of material excavated and removed from the above referenced site has increased. The final tonnage is estimated to be approximately 12,000 tons ± 1000 tons. This additional material represents the same waste stream as classified and tested under the Supplemental IRM Investigation dated November 25, 1992.

During excavation a small amount of red resinous waste was segregated away from accepted waste stream and staged on-Site. This material was sampled and analyzed for TCLP. The attached TCLP analytical results classified this waste as non-hazardous. The estimated volume that has been staged on-Site to await disposal is approximately 3 half-filled 55-gallon drums.

In addition, to the red resin filled drums, approximately 10 drums in varying conditions containing the accepted wastes of yellow resin and white powder have also been staged to await disposal.

Please modify the existing application # M93-0415 to include these wastes. If you have any questions, please do not hesitate to call.

Very truly yours,

RUST ENVIRONMENT & INFRASTRUCTURE

David E. Rowlinson
Project Manager

cc: Craig Slater, Esq. Saperston & Day
Bill Andris, Benderson Development
Glen May, NYSDEC
John Berry, Rust E & I

Wastewater Treatment Plant
CITY OF NORTH TONAWANDA
830 River Road
North Tonawanda, New York 14120
(716) 695-8560

ul J. Drof,
pe ntendent

Stephen J. Sabo
Chief Operator

nn C. Maurer,
ai..enance Supervisor

Mary E. Ferguson,
Sanitary Chemist

January 5, 1994

Mr. Michael Gullo, General Manager
Modern Landfill, Inc.
P.O. Box 209
Model City, N.Y. 14107-0209

RE: 1865 Connecting Road
Town of Niagara
Acceptance of Ground Water

Dear Mr. Gullo:

I have reviewed the submittal by Modern Landfill, Inc. to introduce groundwater from a site remediation to take place at 1865 Connecting Road.

The analytical data submitted included the following:

Method 8240*	Volatile Compounds
Method 8270	Acid Extractable/Base Neutral Compounds
Method 8080	Pesticides

*Methodology from SWM 3rd Edition USEPA.Table 17 - Summary Table of Analytical Data from Groundwater Sample (P2-1) indicated some low level of contamination of this sample. The positive hits were compared to the NYS TOG 1.3.8 for Bioaccumulative and Durable Substances. No compounds identified in the sample were on this listing. Furthermore, the compounds were reviewed in regard to our NYS SPDES Permit and Chapter 75 of the Municipal Code of the City of North Tonawanda, N.Y. It appears that these compounds are within guidelines as set forth in these documents.

Therefore, I believe acceptance of this waste would be possible pending approval of DEC Region 9 and the issuance of proper self-monitoring compliance testing to ensure continuing compliance with all regulations. If you have any questions, please feel free to contact me at your convenience.

Sincerely,

Paul Joseph Drof
Superintendent

PJD:lmn
pc: Sanitary Chemist
R. Locey, DEC Region 9 w/attach.
File: IWH Modern

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
HAZARDOUS SUBSTANCES REGULATION—BUREAU OF HAZARDOUS WASTE OPERATIONS
50 WOLF ROAD, ALBANY, NEW YORK 12233-7252

EMERGENCY WASTE TRANSPORTER PERMIT

Pursuant to 6 NYCRR Part 364 No. of Additional Sheets Attached ☐

NYSDEC PERMIT NUMBER or EXEMPT	EPA TRANSPORTER ID NUMBER	VEHICLE LICENSE NUMBER	STATE OF VEHICLE REGISTRATION
9A-332		K 89449	ME

THIS PERMIT WILL AUTHORIZE:

NAME OF PERMITTEE: Frank's Vacuum Truck Service, Inc.

STREET ADDRESS: 4500 Royal Avenue

CITY	COUNTY	STATE	ZIP CODE
Niagara Falls	Niagara	NY	14303

permittee to transport as needed (Amount—Cubic yards or truckloads) of groundwater/washwater (Type of Waste)

from Benderson Site-1065 Connecting Rd., Tn. of Niagara #NYS 932103 (Spill location)

and deposit it at North Tonawanda WWTP (Name of Disposal Facility). The effective period of this authorization will be from 2:00 p.m. 1/26/94 (Time and Date) to 4:00 p.m. 2/11/94 (Time and Date) and is nontransferable

(Central Office Contact)

Robert Wozniak (Signature of DEC Representative)

(Title/Organizational Unit)

SWMS/Hazardous Substance Regulation (Title/Organizational Unit)

(Address)

270 Michigan Avenue, Buffalo, NY 14203 (Address)

(Telephone Number)

716-851-7220 (Telephone Number)

TO BE COMPLETED BY DISPOSAL FACILITY

This is to certify that _____ (Total amount or portion in cubic yards or truck loads) of the above cited waste material was received at NORTH TONAWANDA WWTP (Name of Disposal Facility)

Paul Joseph Ahof (Signature of Disposal Facility Representative—PRINT NAME FOLLOWING SIGNATURE) Superintendent (Title)

830 River Road North Tonawanda NY 14120 (Facility Address Including City, county, state and zip code)

716/695-8500 (Telephone Number) 1/27/94 (Time and Date of Arrival) NY 0000262280 (EPA Id. Number)

TO BE COMPLETED BY DEC REPRESENTATIVE

CONDITIONS:

1. This ORIGINAL must be filled out and signed by the DEC Representative before the spill material is transported to the disposal facility. A signature must be obtained from the operator or the representative of that facility after delivery of entire amount.
2. A copy of this permit must be carried in each vehicle and presented on demand to any Law Enforcement Officer or any representative of the Department of Environmental Conservation.
3. If the transporter has a valid NYSDEC Waste Transporter Permit, the permit number must be indicated in the upper left hand corner of this form. A copy of this form must be attached to the permit.
4. If no Part 364 permit exists, an exemption may be granted and this permit issued at the discretion of the on-site NYSDEC representative. In this case, no permit number is required on the vehicle.

NOTE: This permit does not relieve the transporter of the responsibility of complying with any other applicable federal, state or local regulations. Please refer to warning notice on back of this permit.

COPY 1 - N.Y.S.D.E.C. REPRESENTATIVE

FRANK'S VACUUM TRUCK SERVICE, INC.
4500 Royal Avenue • Niagara Falls, New York 14303
(716) 284-2132

NYDEC #9A-332
EPA ID# NYD982792814

DATE 1/27/94

PICK UP

NAME BENDERSON
STREET 865 CONNECTING ROAD
CITY NIAGARA FALLS STATE NY ZIP CODE
CONTACT NAME MIKE YOUNG 297-4913
SCHEDULED TIME 01/27/94 8:00 AM
ADDITIONAL INFORMATION P/U SPOTTED TANKER

DELIVERY

NAME NORTH TONAWANDA WWTP
STREET RIVER ROAD
CITY N. TONAWANDA STATE NY ZIP CODE 14120
CONTACT NAME
SCHEDULED TIME
ADDITIONAL INFORMATION

CUSTOMER P.O. NO.	WORK ORDER NUMBER	MANIFEST NUMBER	BILLING REFERENCE
			ME218
ORDER NUMBER	**TRACTOR NUMBER**	**TRAILER NUMBER**	**DRIVER'S NAME**
5324	18	904-S	Dave Chiccone

QUANTITY	WEIGHT OR VOLUME	HAZ. MAT.	DESCRIPTION OF WASTE(S) PER 49 CFR	CUSTOMER CODE #
			Crude oil tank	

TYPE (CIRCLE ONE)
(R/S) (R/L)
DUMP
ROLL-OFF
FLATBED

PLACARDS PROVIDED OR AFFIXED

SHIPPER'S CHECK LIST

DOT LABELS APPLIED AND SECURE		DOT AUTHORIZED CONTAINERS	
PROPER DOT NAME ON ALL PACKAGES		CHECKED FOR PROPER SEALING	

WHEN "RQ" QUANTITY RELEASED INTO ENVIRONMENT, IMMEDIATELY NOTIFY NAT. RESPONSE CENTER - 800-424-8802 AND 911 EMERGENCY SYSTEM OR LOCAL OPERATOR

CHECK SHIPPING PAPER FOR PROPER EMERGENCY RESPONSE GUIDE NUMBER

PICK UP

ARRIVAL DATE 1-27-94
ARRIVAL TIME 8:00 AM/PM RELEASE TIME 2:15 AM/PM
TRAILER EMPTY UPON ARRIVAL ☐ YES ☐ NO
(If not, explain below)
TOP MEASUREMENT (Tankers Only) _____ INCHES
COMMENTS: (EXPLAIN ALL DELAYS) _____

GENERATOR'S CERTIFICATION. This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of transportation.

Title

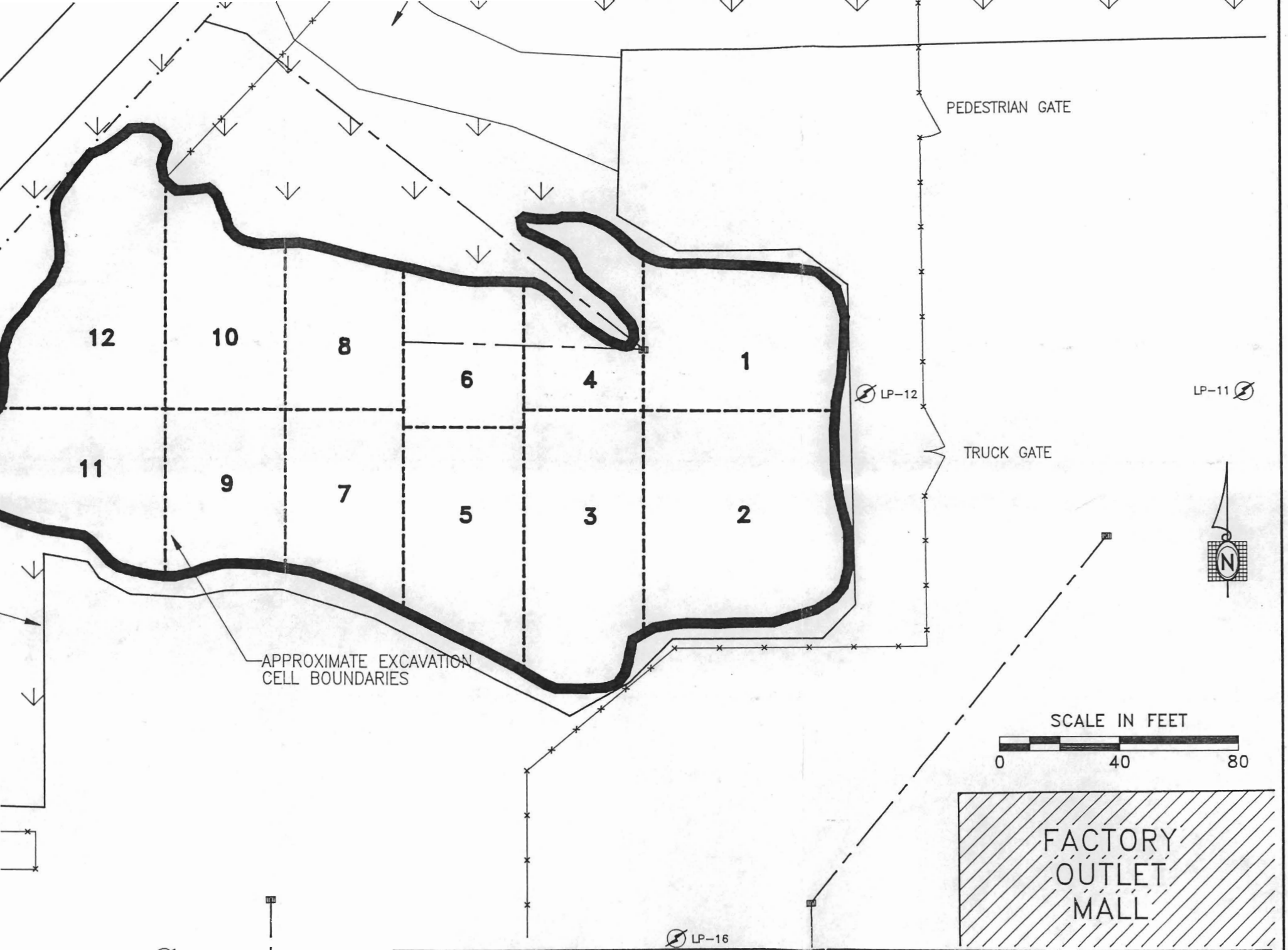
GENERATOR'S SIGNATURE

DELIVERY

DRIVER _____ DATE _____
ARRIVAL TIME _____ AM/PM RELEASE TIME _____ AM/PM
TRAILER EMPTY UPON DEPARTURE ☐ YES ☐ NO
(If not, explain below)
COMMENTS: (EXPLAIN ALL DELAYS) _____

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE

X
CONSIGNEE'S SIGNATURE



ENVIROMENT &
INFRASTRUCTURE
495 Commerce Drive

AS BUILT WASTE REMOVAL MAP
VACANT LAND ADJACENT TO
1865 CONNECTING ROAD