INVENTUM ENGINEERING, PC

CONFIDENTIAL
PREPARED AT THE REQUEST OF COUNSEL

September 11, 2019

Mr. Glenn May
Project Manager
Division of Environmental Remediation
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203-2915

RE: Tulip Molded Plastics Corporation Site
Site No. 932169
Inactive Hazardous Waste Disposal Site Determination Investigation

Dear Mr. May:

Inventum Engineering, PC ("Inventum"), on behalf of Ganson Alternative Energy, LLC (GAE), is responding to the letter dated December 11, 2018 from the New York State Department of Environmental Conservation ("NYSDEC") regarding potential listing of a portion of the Tulip Molded Plastics Corporation Facility located at 3125 Highland Avenue, Niagara Falls, New York (the "site") on the Registry of Inactive Hazardous Waste ("IHWS) Disposal Sites (the "Registry").

The NYSDEC's December 11, 2018 letter identified a general area on the site of "documented disposal of hazardous waste" as well as concentration(s) of lead in soil above 6 NYCRR Part 375 Soil Cleanup Objectives ("SCOs") in two areas along the eastern and southern boundary of the Site (Attachment A).

GAE is electing to complete an initial site investigation to further characterize the potential nature and extent of potential contamination as described in the NYSDEC's notification letter. A proposed scope of work is provided below.

Scope of Work
Property Boundary Lead Exceedances

A minimum of six (6) test pits or direct push soil borings (Geoprobe® or equivalent) will be installed along the southern and eastern property boundary as shown in Figure 1. Test pits are preferred but may be

481 CARLISLE DRIVE
SUITE 202
HERNDON, VA 20170
WWW.INVENTUMENG.COM

limited by access, existing site features and utilities, interference with ongoing operations, or ability/approval to remove any existing railroad ties/tracks.

Test pits or soil borings will be installed to a depth of 5-feet below ground surface (bgs) and a minimum of three (3) soil samples will be collected at each location. One (1) shallow (0 to 1 feet) and two (2) subsurface (2 to 3 feet bgs and base of test pit) samples will be collected at each location and analyzed for Target Analyte List (TAL) metals via EPA Method 6010.

Field screening with a Photoionization Detector (PID) will also be conducted and additional samples will be collected for Volatile Organic Compounds (VOC) and Semi-Volatile Organic Compound (SVOC) analysis only if there is visual or olfactory evidence of impact or PID readings indicate evidence of organic contamination.

Area of Documented Disposal of Hazardous Waste

A minimum of five (5) direct push (Geoprobe® or equivalent) will be installed in the "area of documented disposal of hazardous waste" (Attachment A; Figure 1). Each boring will be extended to the depth that groundwater is encountered which is anticipated to be between 5 to 10-feet bgs. A minimum of three (3) soil samples will be collected at each location. One (1) shallow (0 to 1 feet) and two (2) subsurface (2 to 3 feet bgs and base of boring) samples will be collected at each location and analyzed for TAL metals via EPA Method 6010.

Recovered soils will be field screened with a PID and additional samples will be collected for VOCs and SVOCs only if there is visual or olfactory evidence of impact or PID readings indicate evidence of organic contamination.

Reporting

Inventum will prepare an IHWS Investigation Report to provide the data analysis to the NYSDEC. The report will include a summary of the data collected as part of this initial investigation as well as a summary of historical investigation(s) and historical investigation data — as available to GAE — as it relates to the potential Registry listing.

Closing

If you have any questions regarding the above, please feel free to contact me (john.black@inventumeng.com; 571.217.6761) or Todd Waldrop (todd.waldrop@inventumeng.com; 571.217.3627).

Sincerely,

John Black, PE
Inventum Engineering, PC
481 Carlisle Drive
Suite 202
Herndon, Virginia 20170

Ecc: Jon Williams - Ganson Alternative Energy, LLC
John Yensan - OSC, Inc
John Kolaga - Rupp, Baase, Pfalzgraf, Cunningham LLC
David Pfalzgraf - Rupp, Baase, Pfalzgraf, Cunningham LLC
Wanda Smith Campbell - AIG Environmental & Mass Tort Claims Department
Todd Waldrop – Inventum Engineering, LLC

Figure

D

FIGURE - 1

DRAWING NUMBER: 01 of 01

INVENTUM ENGINEERING
481 CARLISLE DRIVE
SUITE 202
HERNDON, VIRGINIA 20170
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Ganson Alternative Energy LLC
Tulip Molded Plastics Corporation Facility
3125 Highland Avenue, Niagara Falls, NY
Site No. 932169

Proposed
Sampling
Locations

DRAWING BY	J. BLACK II
CHECKED	T. WALDROP
APPROVED	XXX

Attachment A – December 11, 2018 Notification Letter - NYSDEC

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Office of the General Counsel
625 Broadway, 14th Floor, Albany, New York 12233-1500
P: (518) 402-9185 I F: (518) 402-9018
www.dec.ny.gov

December 11, 2018

Ganson Alternative Energy LLC
333 Ganson Street
Buffalo, NY 14203

RE: Potential Hazardous Waste Disposal Site Notification

Dear Sir or Madam:

As required by Environmental Conservation Law ("ECL") Section 27-1305(2)(a) (quoted below), the New York State Department of Environmental Conservation (the "Department") must investigate all known and suspected inactive hazardous waste disposal sites. The Department obtained information suggesting that hazardous waste, as defined at ECL § 27-1301(1), has been disposed of at the following location:

Site Name:	Tulip Molded Plastics Corporation
Site Address:	3125 Highland Avenue, Niagara Falls, New York
Site Number:	932169
Tax Map Nos:	130.18-2-4; 144.06-2-1; 144.23-1-2; 144.23-1-3; 144.23-1-4; 144.23-1-5; 144.23-1-6; and 144.23-1-7

This letter constitutes the Department's notification to you, as the identified property owner, that the Department considers this property to be a potential inactive hazardous waste disposal site. If the Department determines that hazardous waste has been disposed of on the property and that the hazardous waste constitutes a significant threat to public health or the environment, the Department will list the property on the Registry of Inactive Hazardous Waste Disposal Sites (the "Registry").

If you have any information that may be relevant to our investigation and pending determination, please forward it to me or the Department's Project Manager as soon as possible. If you prefer to perform the investigation yourself, you may do so under a legal agreement with the Department and in accordance with the Department's technical requirements. Please contact the Department's Project Manager (see below) within ten (10) business days if you wish to discuss this option. Otherwise, the Department will carry out any needed field investigation. If the property is determined to be an inactive hazardous waste disposal site and the Department incurs response costs to investigate and/or remediate the site, the Department will seek to recover all response costs from any responsible person.

A brief summary of the information currently available to the Department about the site is enclosed for your reference. This information is also available on the Department's public website via the "Environmental Site Remediation Database Search" tool at:

https://www.dec.ny.gov/cfmx/extapps/derexternal/index.cfm?pageid=3

If you have any questions or would like to discuss the possibility of undertaking the investigation of the site yourself, please feel free to contact the Project Manager for this site, Mr. Glenn May, at glenn.may@dec.ny.gov or (716) 851-7220. If you have retained legal counsel in regards to this matter, please have your counsel contact me at (518) 402-8564 with any questions or concerns.

Sincerely,

Michael C. Murphy, Esq.
Office of General Counsel

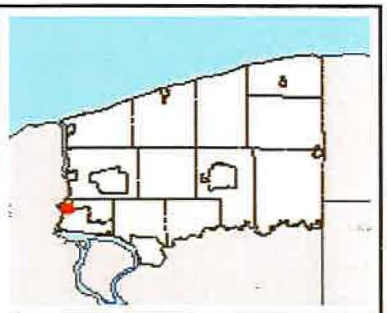
Enclosures

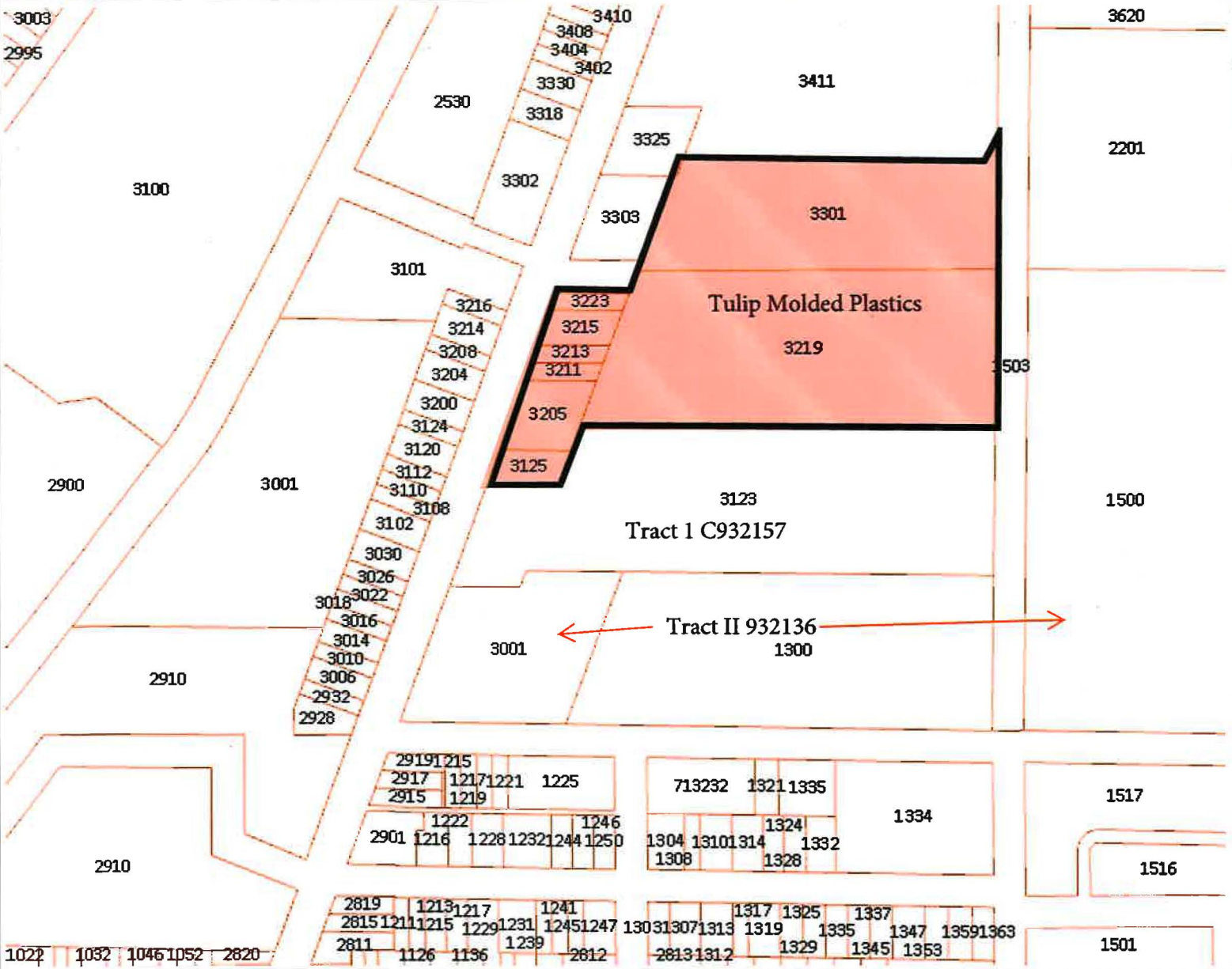
ec: G. May, Region 9, Buffalo
A. Zwack, Region 9, Buffalo
M. Cruden, DER

Environmental Conservation Law
Section 27-1305(2)(a)

"The department shall conduct investigations of the sites listed in the registry and shall investigate areas or sites which it has reason to believe should be included in the registry. The purpose of these investigations shall be to develop the information required by subdivision one of this section to be included in the registry."

Niagara County On-Line Mapping Application





Legend

- Parcels
- Tulip Molded Plastics

0 376.08 752.2 Feet

WGS_1984_Web_Mercator_Auxiliary_Sphere
THIS MAP IS NOT TO BE USED FOR NAVIGATION

NIAGARA COUNTY
DEPARTMENT OF REAL PROPERTY SERVICES

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

1: 4,513

Google Earth

feet 1000
meters 400

Table 8
Tract I Power City Warehouse Excavation Area 1 Confirmatory Samples
Detections Only

			Sample ID	T1-EA1-CS13		T1-EA1-CS14		T1-EA1-CS15		T1-EA1-CS16		T1-EA1-CS17		T1-EA1-CS18	
			Sampled Depth Range (ft)	0 - 2		0 - 2		0 - 2		0 - 2		0 - 2		0-3.5	
			Sample Date	7/17/2013		7/17/2013		7/29/2013		7/29/2013		7/29/2013		8/28/2013	
			Sample Type	Sidewall Confirmatory		Sidewall Confirmatory		Sidewall Confirmatory		Sidewall Confirmatory		Sidewall Confirmatory		Record Sidewall	
Parameter	Units	Restricted Use Soil Cleanup Objectives - Restricted Commercial Standard[1]	Unrestricted Use Soil Cleanup Objectives[1]	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier
Semivolatile Organic Compounds															
Benzo(a)anthracene	µg/Kg[2]	5,600	1,000											**1,100**	
Benzo(a)pyrene	µg/Kg	1,000	1,000											**1,000**	
Benzo(b)fluoranthene	µg/Kg	5,600	1,000											**1,300**	
Dibenz(a,h)anthracene	µg/Kg	560	330											**240**	
Indeno(1,2,3-C,D)pyrene	µg/Kg	5,600	500											**790**	
TCL PCBs															
PCB-1242 (AROCLOR 1242)	µg/Kg	1,000	100												
PCB-1254 (AROCLOR 1254)	µg/Kg	1,000	100												
PCB-1260 (AROCLOR 1260)	µg/Kg	1,000	100												
Target Analyte List (TAL) Metals (Total)															
Arsenic	mg/Kg[9]	16	13												
Barium	mg/Kg	400	350												
Copper	mg/Kg	270	50												
Lead	mg/Kg	1,000	63	**1,280**		**1,010**		**78.8**	J	**295**		41.8		**7,050**	

Notes:
(1)-Standards taken from New York Code of Rules and Regulations (NYCRR) Part 375.
(2)-"µg/Kg"-micrograms per kilogram.
(3)-**Bold**-indicates laboratory detection.
(4)-Yellow Shading indicates that concentration exceeds the Restricted Commercial SCO.
(5)-Green Shading indicates that concentration exceeds the Unrestricted SCO.
(6)-"U" indicates that parameter was not detected above laboratory reporting limit.
(7)-Blank space denotes parameter was not analyzed.
(8)-"J"-indicates estimated value.
(9)-"mg/Kg"-milligrams per kilogram.

Created By: SCC
Checked By: JK

Table 8
Tract I Power City Warehouse Excavation Area 1 Confirmatory Samples
Detections Only

Parameter	Units	Restricted Use Soil Cleanup Objectives - Restricted Commercial Standard[1]	Unrestricted Use Soil Cleanup Objectives[1]	Sample ID	T1-EA1-CS19		T1-EA1-CS20		T1-EA1-CS21		T1-EA1-CS22		T1-EA1-CS23		T1-EA1-CS24	
				Sampled Depth Range (ft)	3.5 - 3.8		2 - 2.3		6 - 6.3		0 - 6		0 - 6		0 - 5	
				Sample Date	8/28/2013		8/29/2013		8/29/2013		8/29/2013		8/29/2013		8/29/2013	
				Sample Type	Base Confirmatory		Base Confirmatory		Base Confirmatory		Sidewall Confirmatory		Record Sidewall		Sidewall Confirmatory	
					Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier
Semivolatile Organic Compounds																
Benzo(a)anthracene	µg/Kg[2]	5,600	1,000		99	J[8]	280		210	U	620		1,100	J	3,300	
Benzo(a)pyrene	µg/Kg	1,000	1,000		81	J	230		210	U	530		820	J	2,700	
Benzo(b)fluoranthene	µg/Kg	5,600	1,000		110	J	330		210	U	720		1,000	J	4,200	
Dibenz(a,h)anthracene	µg/Kg	560	330		210	U	47	J	210	U	120	J	260	J	450	J
Indeno(1,2,3-C,D)pyrene	µg/Kg	5,600	500		61	J	180	J	210	U	360		620	J	1,400	
TCL PCBs																
PCB-1242 (AROCLOR 1242)	µg/Kg	1,000	100													
PCB-1254 (AROCLOR 1254)	µg/Kg	1,000	100													
PCB-1260 (AROCLOR 1260)	µg/Kg	1,000	100													
Target Analyte List (TAL) Metals (Total)																
Arsenic	mg/Kg[9]	16	13													
Barium	mg/Kg	400	350													
Copper	mg/Kg	270	50													
Lead	mg/Kg	1,000	63		22.5		18.5		9.5		1,420		2,150		940	

Notes:
(1)-Standards taken from New York Code of Rules and Regulations (NYCRR) Part 375.
(2)-"µg/Kg"-micrograms per kilogram.
(3)-Bold-indicates laboratory detection.
(4)-Yellow Shading indicates that concentration exceeds the Restricted Commercial SCO.
(5)-Green Shading indicates that concentration exceeds the Unrestricted SCO.
(6)-"U" indicates that parameter was not detected above laboratory reporting limit.
(7)-Blank space denotes parameter was not analyzed.
(8)-"J"-indicates estimated value.
(9)-"mg/Kg"-milligrams per kilogram.

Created By: SCC
Checked By: JK

Table 3
Confirmatory Samples Eastern Portion of Site
Detections Only

Parameter	Units	Unrestricted Use Soil Cleanup Objectives[1]	Restricted Use Soil Cleanup Objectives - Restricted Residential Standard[1]	Restricted Use Soil Cleanup Objectives - Commercial Standard[1]	NG-0		T2-NG-CB1		T2-NG-CB2		T2-NG-CB3		T2-NG-CB4		T2-NG-SW3		T2-NG-SW4	
				Sample Depth (feet):														
				Sample Date:	11/28/2014		10/10/2014		10/10/2014		10/10/2014		10/10/2014		10/10/2014		10/10/2014	
					Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier
Volatile Organic Compounds																		
Acetone	µg/Kg[2]	50	100,000	500,000	NA		NA		NA		NA		NA		NA		NA	
Dichlorodifluoromethane	µg/Kg	NS[3]	NS	NS	NA		NA		NA		NA		NA		NA		NA	
Isopropylbenzene (Cumene)	µg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		NA		NA	
Methyl Acetate	µg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		NA		NA	
Methylcyclohexane	µg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		NA		NA	
Methylene Chloride	µg/Kg	50	100,000	500,000	NA		NA		NA		NA		NA		NA		NA	
Semivolatile Organic Compounds (SVOCs)																		
1,1-Biphenyl	µg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		NA		NA	
2,4-Dimethylphenol	µg/Kg	NS	NS	NS	410	U	390	U	400	U	4,100	U	410	U	400	U	380	U
2,4-Dinitrotoluene	µg/Kg	NS	NS	NS	410	U	390	U	400	U	4,100	U	410	U	400	U	380	U
2,6-Dinitrotoluene	µg/Kg	NS	NS	NS	410	U	390	U	400	U	4,100	U	410	U	400	U	380	U
2-Methylnaphthalene	µg/Kg	NS	NS	NS	82	U	390	U	400	U	4,100	U	410	U	400	U	380	U
2-Methylphenol (O-Cresol)	µg/Kg	330	100,000	500,000	410	U	390	U	400	U	4,100	U	410	U	400	U	380	U
3&4-Methylphenol (m+p Cresol)	µg/Kg	330[4]	100,000	500,000	410	U	390	U	400	U	4,100	U	410	U	400	U	380	U
4-Methylphenol (p-Cresol)	µg/Kg	330	100,000	500,000	NA		NA		NA		NA		NA		NA		NA	
Acenaphthene	µg/Kg	20,000	100,000	500,000	82	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Acenaphthylene	µg/Kg	100,000	100,000	500,000	82	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Anthracene	µg/Kg	100,000	100,000	500,000	82	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Benzaldehyde	µg/Kg	NS	NS	NS	2,000	R	390	UJ	400	UJ	4,100	UJ	410	UJ	400	UJ	380	UJ
Benzo(a)anthracene	µg/Kg	1,000	1,000	5,600	82	U	390	U	400	U	1,300	J	410	U	400	U	380	U
Benzo(a)pyrene	µg/Kg	1,000	1,000	1,000	82	U	390	U	400	U	960	J	410	U	400	U	380	U
Benzo(b)fluoranthene	µg/Kg	1,000	1,000	5,600	82	U	390	U	400	U	830	J	410	U	400	U	380	U
Benzo(g,h,i)perylene	µg/Kg	100,000	100,000	500,000	82	U	390	U	400	U	310	J	410	U	400	U	380	U
Benzo(k)fluoranthene	µg/Kg	800	3,900	56,000	82	U	390	U	400	U	840	J	410	U	400	U	380	U
Benzyl Butyl Phthalate	µg/Kg	NS	NS	NS	410	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Biphenyl (Diphenyl, 1,1'-Biphenyl)	µg/Kg	NS	NS	NS	410	U	2,000	U	2,100	U	21,000	U	2,100	U	2,000	U	2,000	U
Bis(2-ethylhexyl) Phthalate	µg/Kg	NS	NS	NS	410	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Caprolactam	µg/Kg	NS	NS	NS	410	U	390	UJ	400	U	4,100	U	410	U	400	U	380	U
Carbazole	µg/Kg	NS	NS	NS	410	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Chrysene	µg/Kg	1,000	3,900	56,000	82	U	390	U	400	U	1,300	J	410	U	400	U	380	U
Dibenz(a,h)anthracene	µg/Kg	330	330	560	82	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Dibenzofuran	µg/Kg	7,000	59,000	350,000	410	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Diethyl Phthalate	µg/Kg	NS	NS	NS	410	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Dimethyl Phthalate	µg/Kg	NS	NS	NS	2,000	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Di-n-Butyl Phthalate	µg/Kg	NS	NS	NS	410	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Fluoranthene	µg/Kg	100,000	100,000	500,000	82	U	390	U	400	U	1,800	J	410	U	400	U	380	U
Fluorene	µg/Kg	30,000	100,000	500,000	82	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Indeno(1,2,3-cd)pyrene	µg/Kg	500	500	5,600	82	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Isophorone	µg/Kg	NS	NS	NS	410	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Naphthalene	µg/Kg	12,000	100,000	500,000	82	U	390	U	400	U	370	J	410	U	400	U	380	U
N-Nitrosodiphenylamine	µg/Kg	NS	NS	NS	410	U	390	U	400	U	4,100	U	410	U	400	U	380	U
Phenanthrene	µg/Kg	100,000	100,000	500,000	82	U	390	U	400	U	1,000	J	410	U	400	U	380	U
Phenol	µg/Kg	330	100,000	500,000	70	J	390	U	400	U	4,100	U	410	U	400	U	380	U
Pyrene	µg/Kg	100,000	100,000	500,000	82	U	390	U	400	U	1,700	J	410	U	400	U	380	U
Target Compound List (TCL) Pesticides																		
alpha-BHC (alpha Hexachlorocyclohexane)	µg/Kg	20	480	3,400	NA		NA		NA		NA		NA		NA		NA	
beta-BHC (beta Hexachlorocyclohexane)	µg/Kg	36	360	3,000	NA		NA		NA		NA		NA		NA		NA	
delta-BHC (delta Hexachlorocyclohexane)	µg/Kg	40	100,000	500,000	NA		NA		NA		NA		NA		NA		NA	
Dieldrin	µg/Kg	5	200	1,400	NA		NA		NA		NA		NA		NA		NA	
Endrin Ketone	µg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		NA		NA	
Gamma BHC (Lindane)	µg/Kg	100	1,300	9,200	NA		NA		NA		NA		NA		NA		NA	
Methoxychlor	µg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		NA		NA	
4,4'-DDD (p,p'-DDD)	µg/Kg	3.3	13,000	92,000	NA		NA		NA		NA		NA		NA		NA	
4,4'-DDE (p,p'-DDE)	µg/Kg	3.3	8,900	62,000	NA		NA		NA		NA		NA		NA		NA	
4,4'-DDT (p,p'-DDT)	µg/Kg	3.3	7,900	47,000	NA		NA		NA		NA		NA		NA		NA	
Target Compound List (TCL) Polychlorinated Biphenyls (PCBs)																		
Target Analyte List (TAL) Metals (Total)																		
Aluminum	mg/Kg[7]	NS	NS	NS	NA		NA		NA		NA		NA		7,120		8,680	
Antimony	mg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		1.1	UJ	1.1	U
Arsenic	mg/Kg	13	16	16	4.0		3.9		2.0		4.5		3.9		3.8		3.8	
Barium	mg/Kg	350	400	400	NA		NA		NA		NA		NA		68.4		60.3	
Beryllium	mg/Kg	7.2	72	590	NA		NA		NA		NA		NA		0.43	U	0.44	
Cadmium	mg/Kg	2.5	4.3	9.3	NA		NA		NA		NA		NA		0.54	U	0.53	U
Calcium	mg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		38,200		34,300	
Chromium	mg/Kg	1	110	400	NA		NA		NA		NA		NA		11.1		13.4	
Chromium (trivalent)[5]	mg/Kg	30	180	1,500	NA		NA		NA		NA		NA		NA		NA	
Hexavalent Chromium	mg/Kg	1	110	400	NA		NA		NA		NA		NA		NA		NA	
Cobalt	mg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		8.1		9.1	
Copper	mg/Kg	50	270	270	NA		NA		NA		NA		NA		18.1		15.6	
Iron	mg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		15,800		17,500	
Lead	mg/Kg	63	400	1,000	6.1		NA		8.5		642		17.4		4.7		7.4	
Magnesium	mg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		7,080		7,160	
Manganese	mg/Kg	1,600	2,000	10,000	NA		NA		NA		NA		NA		505		486	
Nickel	mg/Kg	30	310	310	NA		NA		NA		NA		NA		17.8		19.5	
Potassium	mg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		1,090		1,300	
Selenium	mg/Kg	3.9	180	1,500	NA		NA		NA		NA		NA		1.1	U	1.1	U
Silver	mg/Kg	2	180	1,500	NA		NA		NA		NA		NA		0.54	U	0.53	U
Sodium	mg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		537	U	534	U
Thallium	mg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		2.1	U	2.1	U
Tin	mg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		NA		NA	
Vanadium	mg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		17.6		20.1	
Zinc	mg/Kg	109	10,000	10,000	NA		NA		NA		NA		NA		30.8	J	34.3	
Mercury	mg/Kg	0.18	0.81	2.8	0.040	U	NA		NA		NA		NA		NA		NA	
General Chemistry																		
Sulfate	mg/Kg	NS	NS	NS	NA		NA		NA		NA		NA		NA		NA	
Toxicity Characteristic Leaching Procedure (TCLP) Metals																		
Lead	mg/L[6]	NS	NS	NS	NA		NA		NA		NA		NA		NA		NA	
Physical Parameters																		
Percent Solids	Percent	NS	NS	NS	NA		NA		NA		NA		NA		NA		NA	

Parameter	Units	T2-NG-SW5		T2-NG-SW6		3003-CB1		3003-SW1		3007-CB1		3007-SW1		3011-CB1		3011-SW1		3017-CB1	
	Sample Date:	12/18/2014		12/18/2014		10/29/2014		10/29/2014		10/24/2014		10/24/2014		10/22/2014		10/22/2014		10/22/2014	
		Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier
Volatile Organic Compounds																			
Acetone	µg/Kg[2]	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Dichlorodifluoromethane	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Isopropylbenzene (Cumene)	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Methyl Acetate	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Methylcyclohexane	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Methylene Chloride	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Semivolatile Organic Compounds (SVOCs)																			
1,1-Biphenyl	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
2,4-Dimethylphenol	µg/Kg	2,400	U	210	U	410	U	510	U	4700	U	4300	U	4,300	U	4,700	U	3,900	U
2,4-Dinitrotoluene	µg/Kg	3,100	U	280	U	84	U	100	U	4700	U	4300	U	4,300	U	4,700	U	3,900	U
2,6-Dinitrotoluene	µg/Kg	3,100	U	280	U	84	U	100	U	4700	U	4300	U	4,300	U	4,700	U	3,900	U
2-Methylnaphthalene	µg/Kg	290		20		410	U	24	J	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
2-Methylphenol (O-Cresol)	µg/Kg	3,100	U	280	U	410	U	510	U	4700	U	4,300	U	4,300	U	4,700	U	3,900	U
3&4-Methylphenol (m+p Cresol)	µg/Kg	6300	U	560	U	NA		NA		4700	U	4300	U	4,300	U	4,700	U	3,900	U
4-Methylphenol (p-Cresol)	µg/Kg	NA		NA		410	U	510	U	NA		NA		NA		NA		NA	
Acenaphthene	µg/Kg	410	J	34		410	U	87	J	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
Acenaphthylene	µg/Kg	170		31		410	U	510	U	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
Anthracene	µg/Kg	1,300	J	89		410	U	110	J	4,700	U	360	J	4,300	U	4,700	U	3,800	U
Benzaldehyde	µg/Kg	1,600	UJ	140	UJ	410	U	510	U	4,700	UJ	4,300	UJ	4,300	UJ	1,800	J	3,900	UJ
Benzo(a)anthracene	µg/Kg	4,800		460		41	U	430		4,700	U	1,300	J	4,300	U	620	J	3,900	U
Benzo(a)pyrene	µg/Kg	4,700		440		15	J	460		4,700	U	930	J	4,300	U	4,700	U	3,900	U
Benzo(b)fluoranthene	µg/Kg	6,900		640		18	J	620		4,700	U	810	J	4,300	U	600	J	3,900	U
Benzo(g,h,i)perylene	µg/Kg	1,600	J	160		410	U	290	J	4,700	U	560	J	4,300	U	370	J	3,900	U
Benzo(k)fluoranthene	µg/Kg	2,000	J	300		41	U	250		4,700	U	4,300	U	4,300	U	4,700	U	3,000	U
Benzyl Butyl Phthalate	µg/Kg	1,100	U	98	U	410	U	510	U	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
Biphenyl (Diphenyl, 1,1'-Biphenyl)	µg/Kg	87	J	70	U	410	U	510	U	24,000	U	22,000	U	22,000	U	24,000	U	20,000	U
Bis(2-ethylhexyl) Phthalate	µg/Kg	1,100	U	30	J	410	U	510	U	4,700	U	4,300	U	680	J	4,700	U	3,900	U
Caprolactam	µg/Kg	5,200	U	460	U	410	UJ	510	U	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
Carbazole	µg/Kg	720	J	62	J	410	U	110	J	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
Chrysene	µg/Kg	4,600		460		14	J	560		4,700	U	1,400	J	4,300	U	490	J	3,900	U
Dibenz(a,h)anthracene	µg/Kg	480	J	52		41	U	130		4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
Dibenzofuran	µg/Kg	410	J	34	J	410	U	46	J	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
Diethyl Phthalate	µg/Kg	1,100	U	98	U	410	U	510	U	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
Dimethyl Phthalate	µg/Kg	1,100	U	98	U	410	U	510	U	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
Di-n-Butyl Phthalate	µg/Kg	920	J	98	U	410	U	510	U	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
Fluoranthene	µg/Kg	8,900		910		34	J	1,600		4,700	U	2,600	J	4,300	U	1,200	J	3,900	U
Fluorene	µg/Kg	660	J	29		410	U	68	J	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
Indeno(1,2,3-cd)pyrene	µg/Kg	1,600	J	160		41	U	400		4,700	U	490	J	4,300	U	4,700	U	3,900	U
Isophorone	µg/Kg	790	U	70	U	170	U	60	J	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
Naphthalene	µg/Kg	390	J	36		410	U	39	J	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
N-Nitrosodiphenylamine	µg/Kg	790	U	70	U	410	U	510	U	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
Phenanthrene	µg/Kg	5,600		410		17	J	660		4,700	U	1,900	J	4,300	U	960	J	3,900	U
Phenol	µg/Kg	790	U	70	U	410	U	510	U	4,700	U	4,300	U	4,300	U	4,700	U	3,900	U
Pyrene	µg/Kg	8,000		830		34	J	820		4,700	U	2,100	J	4,300	U	900	J	3,900	U
Target Compound List (TCL) Pesticides																			
alpha-BHC (alpha Hexachlorocyclohexane)	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
beta-BHC (beta Hexachlorocyclohexane)	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
delta-BHC (delta Hexachlorocyclohexane)	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Dieldrin	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Endrin Ketone	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Gamma BHC (Lindane)	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Methoxychlor	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
4,4'-DDD (p,p'-DDD)	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
4,4'-DDE (p,p'-DDE)	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
4,4'-DDT (p,p'-DDT)	µg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Target Compound List (TCL) Polychlorinated Biphenyls (PCBs)																			
Target Analyte List (TAL) Metals (Total)																			
Aluminum	mg/Kg[7]	6,070		8,800		18,300		18,000		17,200		13,500		18,600		16,300		15,700	
Antimony	mg/Kg	309	J	5.1		1.2	U	2.2		1.5	U	1.4	U	1.1	U	2.4		10.8	
Arsenic	mg/Kg	22.3		10.6		6.1		6.4		6.9		5.2		4.6		6.9		4.5	
Barium	mg/Kg	376		90.3		63.0		81.1		166		104		61.4		84.3		83.6	
Beryllium	mg/Kg	0.60		0.54		0.77		0.87		0.66		0.54	U	0.74		0.60		0.61	
Cadmium	mg/Kg	2.0		0.57	U	0.62	U	0.65	U	0.77	U	0.68	U	0.57	U	1.6		0.60	U
Calcium	mg/Kg	18,900		42,100		1,320		4,100		1,570		9,640		1,600		6,610		4,510	
Chromium	mg/Kg	47.2		16.3		21.4		26.8		26.7		20.1		21.3		22.3		19.3	
Chromium (trivalent)[5]	mg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Hexavalent Chromium	mg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Cobalt	mg/Kg	7.5	U	8.8		18.8		8.7		12.8		8.8		14.3		9.6		9.1	
Copper	mg/Kg	282		49.3		19.6		14.1		16.7		20.1		18.9		21.7		60.0	
Iron	mg/Kg	27,800		34,400		26,300		21,300		24,900		19,900		26,300		30,500		20,800	
Lead	mg/Kg	19,400		1,030		13.7		90.4		16.3		62.2		18.7		166		643	
Magnesium	mg/Kg	4,070		10,600		6,350		4,030		4,830		4,880		5,120		4,390		5,310	
Manganese	mg/Kg	678		545		423		331		581		611		611		396		364	
Nickel	mg/Kg	23.3		21.9		23.7		18.6		21.5		20.4		23.4		21.6		19.3	
Potassium	mg/Kg	754	U	1,260		1,320		1,090		1,430		1,029		1,610		1,080		911	
Selenium	mg/Kg	1.6		1.1	U	1.2	U	1.3	U	1.5	U	1.4	U	1.1	U	1.2	U	1.2	U
Silver	mg/Kg	1.1		0.57	U	0.62	U	0.65	U	0.77	U	0.68	U	0.57	U	0.60	U	0.60	U
Sodium	mg/Kg	754	U	575	U	624	U	652	U	774	U	677	U	572	U	601	U	597	U
Thallium	mg/Kg	3.0	U	2.3	U	2.5	U	2.6	U	3.1	U	2.7	U	2.3	U	2.4	U	2.4	U
Tin	mg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Vanadium	mg/Kg	21.2		28.4		31.1		30.6		31.9		27.3		33.3		29.5		29.1	
Zinc	mg/Kg	618		733		67.8		91.5		66.1		89.4		68.1		165		274	
Mercury	mg/Kg	3.3		0.33		0.048		0.40		0.062		0.38		0.042	U	0.28		0.17	
General Chemistry																			
Sulfate	mg/Kg	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Toxicity Characteristic Leaching Procedure (TCLP) Metals																			
Lead	mg/L[6]	NA		NA		NA		NA		NA		NA		NA		NA		NA	
Physical Parameters																			
Percent Solids	Percent	NA		NA		NA		NA		NA		NA		NA		NA		NA	