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May 16, 2007

Richard L. DuPilka, P.E. City of Poughkeepsie 62 Civic Center Plaza PO Box 300 Poughkeepsie, NY 12602

via EMAIL: rdupilka@cityofpoughkeepsie.com

Re: <u>Letter Report of Annual Operation and Maintenance Services</u> performed on the property known as the "400 Block", City of Poughkeepsie, Dutchess County, New York ESI File: CP9920.81

Dear Mr. DuPilka:

This Letter Report of Annual Operation and Maintenance Services (Letter Report) summarizes fieldwork performed by Ecosystems Strategies, Inc. (ESI) on the above-referenced property. Fieldwork was conducted in order to: document the integrity of the on-site barrier layer, document that on-site vapor extraction system fans were functioning, and document the integrity of groundwater at five (5) on-site monitoring wells. This Letter Report includes a Fieldwork map (Attachment A), laboratory data tables (Attachment B) and the complete laboratory report (Attachment C).

#### 1.0 Inspection of Barrier Layer

A barrier layer was installed at the property in order to prevent potential contact with on-site contaminated soils. The barrier layer consists of a minimum of two feet of certified clean fill placed over all contaminated areas not covered by asphalt or buildings. ESI personnel visually inspected the barrier layer on April 20, 2007 and found it to be intact and free of damage.

#### 2.0 Inspection of Vapor Extraction System

A sub-slab vapor extraction system was installed at the property in order to intercept accumulating vapors associated with on-site contaminated soils. Intercepted vapors are vented above the rooflines of the three, adjoining on-site buildings via three roof-mounted fans (one associated with each building). ESI personnel performed an inspection of the fans on April 25, 2007. At the time of the inspection, it was determined that the fan associated with the easternmost building ("Building C," see Fieldwork Map) was not functioning. An inspection of the associated visual fail-safe alarm (indicator light) confirmed that the fan was not functioning. Information provided by the property manager suggested that there might be an electrical problem. Remaining fans were determined to be functioning properly.

#### 3.0 Groundwater Sampling

# 3.1 Fieldwork Methodology

Groundwater samples were collected from monitoring wells MW-2R-2, MW-3, MW-4, MW-5R, and MW-6 on April 20, 2007 (see Fieldwork Map). All wells were sampled utilizing dedicated tubing and a peristaltic pump. At least three (3) well volumes were purged from each well prior to sampling. Purge-water was screened for any indications of petroleum contamination (see Table 1, below).

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All groundwater samples were collected in a manner consistent with New York State Department of Environmental Conservation (NYSDEC) sample collection protocols. Dedicated tubing was used at each sample location to avoid cross-contamination. Each groundwater sample was collected into laboratory-supplied glassware. After sample collection, the jars were kept cold and transported on April 23, 2007, via currier to York Analytical Labs, Inc., a New York State Department of Health-approved laboratory (ELAP Certification Number 10854). Appropriate chain-of-custody procedures were followed.

Well ID	Depth of Well	Depth to Groundwater	Observations
MW-2R-2	19.68'	5.21'	Well cap loose and rubber seal gone. Red-brown purge to start, changing to cloudy gray, then clear. Slight sewage odor. No evidence of contamination.
MW-3	17.30'	8.16'	Red-brown purge to start, then clear. Slight sewage odor. No evidence of contamination
MW-4	20.45'	11.68'	Dark brown purge to start, then quickly clearing. No evidence of contamination.
MW-5R	15.00'	9.52'	Cloudy white to clear purge, then clearing. No evidence of contamination.
MW-6	14.78'	4.56'	Well cap loose and buried with sand/gravel material. A minor amount of material fell into well during well opening. Dark gray purge to start, then quickly clearing. No evidence of contamination.

#### Table 1: Field Observations

# 3.2 Laboratory Analysis

One groundwater sample was collected at each monitoring well location and submitted for analysis of volatile organic compounds (VOCs) using USEPA Method 8021, and total and dissolved RCRA metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver), using various USEPA methods. Complete laboratory results are included as Attachment C.

The term "guidance level", as defined in this <u>Letter Report</u>, refers to the concentration of a particular contaminant above which remedial actions are considered more likely. The overall objective of setting guidance levels is to assess the integrity of on-site groundwater relative to conditions that are likely to present a threat to public health, given the existing and probable future uses of the site.

The guidance levels identified in this <u>Letter Report</u> for groundwater are determined based on the NYSDEC's <u>Division of Water Technical and Operational Guidance Series</u>, <u>Ambient Water Quality</u> <u>Standards and Guidance levels and Groundwater Effluent Limitations (TOGS) 1.1.1, June 1998</u>. All compounds referenced below are presented with their respective guidance levels.

# 3.3 Results

VOCs

NO VOCs were detected at any sample location during this sampling round.

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#### TOTAL RCRA METALS

Arsenic was detected above the guidance level (25  $\mu$ g/L) at MW-2R-2 (71  $\mu$ g/L). Lead was detected above the guidance level (25  $\mu$ g/L) at MW-2R-2 (75  $\mu$ g/L), but below the guidance level at MW-3, and MW-4 (7  $\mu$ g/L and 14  $\mu$ g/L, respectively). Barium was detected significantly below the guidance level (1,000  $\mu$ g/L) at all locations (peak concentration: 256  $\mu$ g/L at MW-5R, average concentration: 154.2  $\mu$ g/L), and chromium was detected below the guidance level (50  $\mu$ g/L) at all locations (peak concentration: 39  $\mu$ g/L at MW-5R, average concentration: 14.8  $\mu$ g/L). Mercury was detected below the guidance level (0.7  $\mu$ g/L) at MW-2R-2 (0.3  $\mu$ g/L). No other metals were detected at any other sample location.

# DISSOLVED RCRA METALS

Dissolved barium was detected significantly below the guidance level (1,000  $\mu$ g/L) in all samples (peak concentration: 252  $\mu$ g/L at MW-5R, average concentration: 138  $\mu$ g/L), and chromium was detected below the guidance level (50  $\mu$ g/L) in all samples (peak concentration: 38  $\mu$ g/L at MW-5R, average concentration: 13.8  $\mu$ g/L). No other dissolved metals were detected at any other sample location.

# 3.4 Comparison with Previous Data

A discussion of the results of groundwater sampling at the property is presented below (data summary tables are provided as Attachment B).

#### VOCs

Both elevated and low-level concentrations of several VOCs were first detected at the property during sampling at monitoring well MW-2R in May 1999 and July 2003. Well MW-2R has since been destroyed and therefore no additional data exists. Slightly elevated concentrations of methyl tertiary butyl ether (MTBE) were detected at MW-3 in April, August, and December 2004, and April 2005. A low-level concentration of MTBE was also detected at MW-6 during the January 2004 sampling, and at MW-4 during the April 2005 sampling. MTBE has not been detected at MW-6 for the past six consecutive samplings, and has not been detected at MW-3 or MW-4 for the past three consecutive samplings. No other VOCs were detected at any other wells during any other sampling round.

#### PAHs

No PAHs have been detected in any of the groundwater monitoring wells in any sampling round. As a result, no PAH analysis was performed during the current sampling round.

#### TOTAL RCRA METALS

Total arsenic increased at MW-2R-2 from below the guidance level at 16  $\mu$ g/L in the previous sampling round, to above the guidance level at 71  $\mu$ g/L in the current sampling round. Total arsenic remains below the guidance level at MW-5 and has decreased slightly since the previous sampling. Total arsenic at all other wells has remained at non-detectable levels for several consecutive sampling periods.

Total lead increased at MW-2R-2 from below the guidance level at 5  $\mu$ g/L in the previous sampling round, to above the guidance level at 75  $\mu$ g/L in the current sampling round; however, total lead has generally decreased at MW-2R-2 since the initial sampling in April 2004 (1010  $\mu$ g/L). Total lead increased only slightly from the previous sampling at MW-3 and MW-4, however, concentrations remain significantly below the guidance level. Total lead decreased to non-detectable levels at MW-5R and MW-6 during this sampling round.

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Total barium decreased slightly at MW-5 and increased slightly at all other monitoring wells, when compared to the previous sampling round. Total chromium increased slightly at all wells from the previous sampling round. Concentrations of barium and chromium, however, remain significantly below respective guidance levels.

Total mercury was not detected in any of the monitoring wells during the current sampling round, with the exception of MW-2R-2, where the concentration rose from a non-detectable level in the previous sampling round to 0.3  $\mu$ g/L (still below the guidance level). Cadmium and selenium concentrations have remained at non-detectable levels for several sampling rounds, and silver has not been detected in any of the wells during any sampling round.

#### DISSOLVED RCRA METALS

No dissolved metals were detected in the current sampling round at concentrations above NYSDEC guidance levels. Lead concentrations have remained at non-detectable levels at all wells. Dissolved barium and chromium increased slightly at all wells. Dissolved arsenic, cadmium, mercury, selenium and silver remained constant at non-detected levels. The absence of dissolved metal concentrations relative to total metals indicates that contamination is limited to metal particulates suspended in the groundwater, which are likely to be the result of contaminated soil.

#### 4.0 CONCLUSIONS

Annual site management activities were conducted on the property known as the "400 Block" located in the City of Poughkeepsie, Dutchess County, New York. Investigative and analytical work was conducted to verify the integrity of the on-site barrier layer, to verify the proper functioning of on-site vapor extraction system fans, and to document the presence or absence of petroleum hydrocarbons and RCRA metals in on-site groundwater.

Data support the following conclusions:

- 1. The vapor extraction system fan associated with the easternmost building (Building C) is not functioning. The fan and/or wiring will need to be repaired or replaced, a follow-up inspection will need to be made, and documentation of proper functioning will need to be submitted to the NYSDEC. Inspections will continue thereafter on an annual basis.
- 2. Only one VOC (MTBE) has been detected at three of the five, currently existing on-site monitoring wells (only MW-3, MW-4, and MW-6). MTBE has not been detected at any of these wells for at least the past three consecutive sampling rounds, and no other VOCs have been detected at any of the other on-site monitoring wells during any other sample round. Elevated concentrations of several total RCRA metals are still present in groundwater at on-site monitoring wells; however, no significant changes in concentration are noted. Low-level concentrations of two dissolved RCRA metals continue to exist at all on-site wells. These data suggest that the overall condition of the on-site groundwater is generally improving, and that VOC and RCRA metal concentrations are not at levels warranting further remediation. Therefore, in accordance with the schedule outlined in the NYSDEC approved <u>Site Management Plan</u>, sampling will continue to occur on an annual basis.

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#### 3. The on-site barrier layer is intact and inspection will continue annually.

The operation and maintenance services summarized herein are part of an approved NYSDEC Brownfields <u>Site Management Plan</u> and are considered by ESI to satisfy the requirements set forth in the <u>Site Management Plan</u>. By copy, this <u>Letter Report</u> is being forwarded to the NYSDEC.

Please review this information and call me at (845) 452-1658 should you have any questions or comments.

Sincerely,

ECOSYSTEMS STRATEGIES, INC.

Adam Lee Project Manager

cc: M. Mason, NYSDEC – via Email: <u>mamason@gw.dec.state.ny.us</u> File

Attachments:

- A Fieldwork Map
- B Data Summary Tables
- C Laboratory Results

# ATTACHMENT A

Fieldwork Map

Ecosystems Strategies, Inc.



# ATTACHMENT B

# Data Summary Tables

# Table 2: Summary of VOCs and PAHs in Groundwater

All data provided in ppb. Concentration in **bold** exceed NYSDEC guidance levels

													Sample	Identific	ation														
VOCs (Method 8260)	Guidance		MV	V-1		MM	/-2R			MW-2	2R-2								MW	-3									
	Levels	May-99	July-03	Apr-04	Aug-04	May-99	July-03	Apr-04	Aug-04	Dec-04	Apr-05	Oct-05	Mar-06	Apr-07	May-99	July-03	Jan-04	Apr-04	Aug-04	Dec-04	Apr-05	Oct-05	Mar-06	Apr-07					
Benzene	0.7	ND	ND	ND	4	92	6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND					
n-Butylbenzene	5	ND	ND	ND	_	3	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND					
Bromomethane	5	ND	ND	ND	4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND					
Chloroform	7	ND	ND	ND	4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND					
Chloromethane	5	ND	ND	ND	4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND					
Tert-Butylbenzene	5	ND	ND	ND	-	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-				
1,2-Dichloroethylene (Total)	5	ND	ND	ND	P	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-				
Ethylbenzene	5	ND	ND	ND	no	2	8	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-				
p-Isopropyltoluene	5	ND	ND	ND	st f	1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND					
loluene	5	ND	ND	ND	Ĕ	50	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND					
Isopropylbenzene	5	ND	ND	ND	vel	ND	1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND 10	ND	ND	ND	ND	ND	ND					
MIBE	10	ND	ND	ND	6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	16	27	17	19	ND	ND	ND					
	10	ND	ND	ND	j.	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND					
n-Propyibenzene	5	ND	ND	ND	Dite	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND					
1,2,4-1 rimetnyibenzene	5	ND	ND	ND	Ŵ	ND	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-				
	5	ND	ND	ND	4 -	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	-				
1 2 5 Trimothylhonzono	5				-			ND	ND		ND							ND						ND	-				
	5				-	70					ND														-				
	5				-	15	2				ND														-				
F/III-Aylerie	5	ND	ND	ND	-	15	2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND					
Total PAHs (Method 8270)	varias			ND	-	ND	ND	ND	ND	ND	ND	ND	ND	NS	ND			ND	ND	ND	ND		ND	NS	-				
Total T Aris (Method 0270)	valles	ND	ND	ND		ND	ND	ND	ND	ND	ND	ND	ND	NO	ND	ND	ND	ND	ND	ND	ND	ND	ND	NO					
		•																											
													Sample	Identific	ation														
VOCS (Method 8260)	Guidance	Mar. 00	1	A	<u>M</u>	W-4	0.1.05	Max 00	A	Mar. 00	1	1	MW-5	A 04	D 04	A 05	0 - 1 05	MW-5R	A 07	Mar. 00	1	1 1	A	MV	V-6	A 05	0-1-05	Mar. 00	A 07
Denzene	Leveis	May-99	JUIY-03	Aug-04	Dec-04	Apr-05	Oct-05	Mar-06	Apr-07	May-99	JUIY-03	Jan-04	Apr-04	Aug-04	Dec-04	Apr-05	Oct-05	Mar-06	Apr-07	May-99	July-03	Jan-04	Apr-04	Aug-04	Dec-04	Apr-05	OCt-05	Mar-06	Apr-07
Benzene	0.7				ND		ND	ND	ND		ND					-								-					
Bromomothano	5 5										ND													-					
Chloroform	7										ND													-					
Chloromethane	5				ND	ND	ND	ND	ND	ND	ND				ND	ses								-	ND				
Tert-Butylbenzene	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	nu	ND	ND	ND	ND		ND	ND	-	ND	ND	ND	ND	
1 2-Dichloroethylene (Total)	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	le/u	ND	ND	ND	ND		ND	ND	ğ	ND	ND	ND	ND	ND
Ethylbenzene	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	abl	ND	ND	ND	ND	pur	ND	ND	blq	ND	ND	ND	ND	ND
p-Isopropyltoluene	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	per	ND	ND	ND	ND	fol	ND	ND	an	ND	ND	ND	ND	ND
Toluene	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0 L	ND	ND	ND	ND	Jot	ND	ND	ots	ND	ND	ND	ND	ND
Isopropylbenzene	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	2	ND	ND	ND	ND	- Ilé	ND	ND	Ĕ	ND	ND	ND	ND	ND
MTBE	10	ND	ND	ND	ND	1	ND	ND	ND	ND	ND	ND	ND	ND	ND	rari	ND	ND	ND	ND	Ň	1	ND	vel	ND	ND	ND	ND	ND
Naphthalene	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ā	ND	ND	ND	ND	ing	ND	ND	- Gr	ND	ND	ND	ND	ND
n-Propylbenzene	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	E E	ND	ND	ND	ND	tor	ND	ND	arir I	ND	ND	ND	ND	ND
1,2,4-Trimethylbenzene	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	i t	ND	ND	ND	ND	oni	ND	ND	nite	ND	ND	ND	ND	ND
Tetrachloroethene	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	Ň	ND	ND	ND	ND	Σ	ND	ND	Ř	ND	ND	ND	ND	ND
Tetrachloro-ethylene	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ing	ND	ND	ND	ND		ND	ND		ND	ND	ND	ND	ND
1,3,5-Trimethylbenzene	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	tori	ND	ND	ND	ND		ND	ND		ND	ND	ND	ND	ND
o-Xylene	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	jui	ND	ND	ND	ND		ND	ND	]	ND	ND	ND	ND	ND
P/m-Xylene	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ž	ND	ND	ND	ND		ND	ND		ND	ND	ND	ND	ND
																]								]					
Total PAHs (Method 8270)	varies	ND	ND	ND	ND	ND	ND	ND	NS	ND	ND	ND	ND	ND	ND	<u> </u>	ND	ND	NS	ND		ND	ND	<u> </u>	ND	ND	ND	ND	NS
Notes: Source: <u>TOGS 1.1.</u> NS = Not Sampled	1, June 199	98.																											

ND = Not Detected

# Table 3: Summary of Total RCRA Metals in GroundwaterAll data provided in ppb.Concentrations in bold exceed NYSDEC guidance levels.

													Sam	ple Identi	fication									
	Guidance		MV	V-1		M٧	V-2R			Γ	/W-2R-2	2							MV	V-3				
Metals	Level	May-99	July-03	Apr-04	Aug-04	May-99	July-03	Apr-04	Aug-04	Dec-04	Apr-05	Oct-05	Mar-06	Apr-07	May-99	July-03	Jan-04	Apr-04	Aug-04	Dec-04	Apr-05	Oct-05	Mar-06	Apr-07
Arsenic	25	12	ND	6	t	31	14	30	48	83	43	18	16	71	10	ND	ND	5	10	ND	7	ND	ND	ND
Barium	1,000	120	173	113	bu	1,090	312	652	477	970	518	233	40	115	780	75	60	148	181	251	65	99	40	89
Cadmium	5	ND	ND	ND	/ell	2	ND	ND	ND	6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	50	ND	12	12	ad	ND	17	20	18	29	15	12	ND	9	60	7	5	7	10	15	6	6	ND	8
Lead	25	59	46	96	fou	214	160	1010	683	1860	864	307	5	75	13	46	ND	108	275	574	16	31	ND	7
Mercury	0.7	ND	5.7	0.5	ito	ND	2	4.3	8	12.7	9.4	1.4	ND	0.3	ND	5.2	ND	ND	0.8	2.7	ND	ND	ND	ND
Selenium	10	ND	ND	ND	lon	ND	ND	ND	16	22	ND	ND	ND	ND	ND	ND	ND	ND	11	ND	ND	ND	ND	ND
Silver	50	ND	ND	ND	2	ND	ND	ND	ND	ND	ND	ND	ND	ND	20	ND	ND	ND	ND	ND	ND	ND	ND	ND
							-													-				

													Sam	ple Identi	fication														
	Guidance				M	N-4							MW-5					MW-5R						М	W-6				
Metals	Level	May-99	July-03	Aug-04	Dec-04	Apr-05	Oct-05	Mar-06	Apr-07	May-99	July-03	Jan-04	Apr-04	Aug-04	Dec-04	Apr-05	Oct-05	Mar-06	Apr-07	May-99	July-03	Jan-04	Apr-04	Aug-04	Dec-04	Apr-05	Oct-05	Mar-06	Apr-07
Arsenic	25	ND	ND	11	ND	ND	ND	ND	ND	17	ND	10	17	10	t	ole	ND	ND	ND	8	t	ND	9	ot	ND	ND	ND	ND	ND
Barium	1,000	320	144	191	141	106	175	99	110	320	195	92	235	212	bu	eak	111	108	256	140	bu	28	84	bu	94	103	112	169	201
Cadmium	5	1	ND	ND	ND	ND	ND	ND	ND	2	ND	ND	ND	ND	/ell	us u	ND	ND	ND	ND	/ell	ND	ND	d /ell	ND	ND	ND	ND	ND
Chromium	50	ND	ND	10	8	6	12	6	10	20	24	8	15	32	פ בי	ing val	11	7	39	ND	v b⊓	7	10	g v Ple	11	12	10	7	8
Lead	25	6	10	245	114	58	115	12	14	508	193	27	253	395	fou	npo ole/	ND	6	ND	60	fou	ND	26	am	38	18	9	5	ND
Mercury	0.7	ND	ND	1.2	1	0.3	ND	ND	ND	ND	11.6	4.5	0.5	3.8	ito	oni ten	ND	ND	ND	ND	ito	ND	ND	s: s	ND	ND	ND	ND	ND
Selenium	10	ND	ND	12	ND	ND	ND	13	lon	D A	ND	ND	ND	ND	lon	ND	ND	lon	ND	ND	ND	ND	ND						
Silver	50	ND	2.1	ND	ND	ND	ND	2	ine	ND	ND	ND	ND	2	ND	ND	2	ND	ND	ND	ND	ND							

Notes: Source: TOGS 1.1.1, June 1998.

ND = Not Detected

# Table 4: Summary of Dissolved RCRA Metals in GroundwaterAll data provided in ppb.Concentrations in bold exceed NYSDEC guidance levels.

													Sam	ple Identi	fication									
	Guidance		MV	V-1		M	<i>N-</i> 2R			ľ	MW-2R-2	2							MW	1-3				
Metals	Level	May-99	July-03	Apr-04	Aug-04	May-99	July-03	Apr-04	Aug-04	Dec-04	Apr-05	Oct-05	Mar-06	Apr-07	May-99	July-03	Jan-04	Apr-04	Aug-04	Dec-04	Apr-05	Oct-05	Mar-06	Apr-07
Arsenic	25	ND	ND	ND	t	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Barium	1,000	10	65	69	ou	480	185	170	96	49	55	74	25	68	700	44	57	111	95	82	58	83	36	80
Cadmium	5	ND	ND	ND	/ell	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	50	ND	ND	6	g ∧ Ind	ND	ND	6	5	5	ND	ND	ND	6	60	ND	ND	ND	6	6	5	6	ND	8
Lead	25	ND	ND	ND	for	1	5	5	ND	ND	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	ND	ND	ND
Mercury	0.7	ND	ND	ND	lito	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.9	ND							
Selenium	10	ND	ND	ND	lon	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Silver	50	ND	ND	ND	2	ND	ND	ND	ND	ND	ND	ND	ND	ND	20	ND	ND	ND	ND	ND	ND	ND	ND	ND

													Sam	ple Identi	fication														
	Guidance				M١	N-4							MW-5					MW-5R						M	W-6				
Metals	Level	May-99	July-03	Aug-04	Dec-04	Apr-05	Oct-05	Mar-06	Apr-07	May-99	July-03	Jan-04	Apr-04	Aug-04	Dec-04	Apr-05	Oct-05	Mar-06	Apr-07	May-99	July-03	Jan-04	Apr-04	Aug-04	Dec-04	Apr-05	Oct-05	Mar-06	Apr-07
Arsenic	25	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	ND	t	ole	ND	ND	ND	ND	t	ND	ND	t	ND	ND	ND	ND	ND
Barium	1,000	280	134	90	76	76	98	85	99	120	69	77	12	76	ou	eab Bab	111	98	252	80	ou	18	51	ou	40	45	59	132	191
Cadmium	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	/ell	ily we	ND	ND	ND	ND	/ell	ND	ND	llə/ d	ND	ND	ND	ND	ND
Chromium	50	ND	ND	5	5	6	5	6	9	ND	6	ND	ND	16	o d ∎nd	ing orai /un	11	ND	38	1	a ka	7	8	g v ple	6	8	ND	7	8
Lead	25	ND	ND	ND	ND	6	ND	ND	ND	4	10	8	34	15	fou	n por	ND	ND	ND	ND	fou	ND	ND	am	ND	ND	ND	ND	ND
Mercury	0.7	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.2	ND	ND	ND	lito	oni ten	ND	ND	ND	ND	lito	ND	ND	nito s	ND	ND	ND	ND	ND
Selenium	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	lon	ž do	ND	ND	ND	ND	lon	ND	ND	lon	ND	ND	ND	ND	ND
Silver	50	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	2	in	ND	ND	ND	ND	2	ND	ND	2	ND	ND	ND	ND	ND

Notes: Source: TOGS 1.1.1, June 1998.

ND = Not Detected

#### Environmental Services and Solutions

# ATTACHMENT C

# Laboratory Results



# **Technical Report**

prepared for:

Ecosystems Strategies, Inc. 24 Davis Avenue Poughkeepsie, NY 12603 Attention: Adam Lee

Report Date: 4/27/2007 *Re: Client Project ID: CP9920.81* York Project No.: 07040637

CT License No. PH-0723

New York License No. 10854



120 RESEARCH DRIVE STRATFORD, CT 06615 (203) 325-1371 FAX (203) 357-0166

Report Date: 4/27/2007 Client Project ID: CP9920.81 York Project No.: 07040637

# Ecosystems Strategies, Inc.

24 Davis Avenue Poughkeepsie, NY 12603 Attention: Adam Lee

# Purpose and Results

This report contains the analytical data for the sample(s) identified on the attached chain-of-custody received in our laboratory on 04/23/07. The project was identified as your project "CP9920.81".

The analyses were conducted utilizing appropriate EPA, Standard Methods, and ASTM methods as detailed in the data summary tables.

All samples were received in proper condition meeting the NELAC acceptance requirements for environmental samples except those indicated under the Notes section of this report.

All the analyses met the method and laboratory standard operating procedure requirements except as indicated under the Notes section of this report, or as indicated by any data flags, the meaning of which is explained in the attachment to this report, if applicable.

The results of the analyses, which are all reported on an as-received basis unless otherwise noted, are summarized in the following table(s).

Client Sample ID			MW-2R-2		MW-3	
York Sample ID			07040637-01		07040637-02	
Matrix			WATER		WATER	
Parameter	Method	Units	Results	MDL	Results	MDL
Volatiles, 8021+MTBE	SW846-8260	ug/L				
1,1,1,2-Tetrachloroethane			Not detected	5.0	Not detected	5.0
1,1,1-Trichloroethane			Not detected	5.0	Not detected	5.0
1,1,2,2-Tetrachloroethane			Not detected	5.0	Not detected	5.0
1,1,2-Trichloroethane			Not detected	5.0	Not detected	5.0
1,1-Dichloroethane			Not detected	5.0	Not detected	5.0
1,1-Dichloroethylene			Not detected	5.0	Not detected	5.0
1,1-Dichloropropylene			Not detected	5.0	Not detected	5.0
1,2,3-Trichlorobenzene			Not detected	5.0	Not detected	5.0
1,2,3-Trichloropropane			Not detected	5.0	Not detected	5.0
1,2,4-Trichlorobenzene			Not detected	5.0	Not detected	5.0
1,2,4-Trimethylbenzene			Not detected	5.0	Not detected	5.0
1,2-Dibromo-3-chloropropane			Not detected	5.0	Not detected	5.0
1,2-Dibromoethane			Not detected	5.0	Not detected	5.0
1,2-Dichlorobenzene			Not detected	5.0	Not detected	5.0
1,2-Dichloroethane			Not detected	5.0	Not detected	5.0
1,2-Dichloroethylene (Total)			Not detected	5.0	Not detected	5.0
1,2-Dichloropropane			Not detected	5.0	Not detected	5.0

# Analysis Results



York Sample ID 07040637-01			
		07040637-02	
Matrix WATER		WATER	
Parameter Method Units Results	MDL	Results	MDL
1,3,5-Trimethylbenzene Not detected	5.0	Not detected	5.0
1,3-Dichlorobenzene Not detected	5.0	Not detected	5.0
1,3-Dichloropropane Not detected	5.0	Not detected	5.0
1,4-Dichlorobenzene Not detected	5.0	Not detected	5.0
2,2-Dichloropropane Not detected	5.0	Not detected	5.0
2-Chlorotoluene Not detected	5.0	Not detected	5.0
4-Chlorotoluene Not detected	5.0	Not detected	5.0
Benzene Not detected	5.0	Not detected	5.0
Bromobenzene Not detected	5.0	Not detected	5.0
Bromochloromethane Not detected	5.0	Not detected	5.0
Bromodichloromethane Not detected	5.0	Not detected	5.0
Bromoform Not detected	5.0	Not detected	5.0
Bromomethane Not detected	5.0	Not detected	5.0
Carbon tetrachloride Not detected	5.0	Not detected	5.0
Chlorobenzene Not detected	5.0	Not detected	5.0
Chloroethane Not detected	5.0	Not detected	5.0
Chloroform Not detected	5.0	Not detected	5.0
Chloromethane Not detected	5.0	Not detected	5.0
cis-1,3-Dichloropropylene Not detected	5.0	Not detected	5.0
Dibromochloromethane Not detected	5.0	Not detected	5.0
Dibromomethane Not detected	5.0	Not detected	5.0
Dichlorodifluoromethane Not detected	5.0	Not detected	5.0
Ethylbenzene Not detected	5.0	Not detected	5.0
Hexachlorobutadiene Not detected	5.0	Not detected	5.0
Isopropylbenzene Not detected	5.0	Not detected	5.0
Methyl tert-butyl ether (MTBE) Not detected	5.0	Not detected	5.0
Methylene chloride Not detected	5.0	Not detected	5.0
Naphthalene Not detected	5.0	Not detected	5.0
n-Butylbenzene Not detected	5.0	Not detected	5.0
n-Propylbenzene Not detected	5.0	Not detected	5.0
o-Xylene Not detected	5.0	Not detected	5.0
p- & m-Xylenes Not detected	5.0	Not detected	5.0
p-Isopropyltoluene Not detected	5.0	Not detected	5.0
sec-Butylbenzene Not detected	5.0	Not detected	5.0
Styrene Not detected	5.0	Not detected	5.0
tert-Butylbenzene Not detected	5.0	Not detected	5.0
Tetrachloroethylene Not detected	5.0	Not detected	5.0
Toluene Not detected	5.0	Not detected	5.0
trans-1,3-Dichloropropylene Not detected	5.0	Not detected	5.0
Trichloroethylene Not detected	5.0	Not detected	5.0
Trichlorofluoromethane Not detected	5.0	Not detected	5.0
Vinyl chloride Not detected	5.0	Not detected	5.0
Metals, Total RCRA List SW846-6010B mg/L			
Arsenic, total 0.071	0.004	Not detected	0.004
Barium, total 0.115	0.005	0.089	0.005
Cadmium, total Not detected	0.005	Not detected	0.005
Chromium, total 0.009	0.005	0.008	0.005
Lead, total 0.075	0.003	0.007	0.003
Selenium, total Not detected	0.005	Not detected	0.005
Silver, total Not detected	0.005	Not detected	0.005
Mercury SW846-7470 mg/L 0.0003 (	0.0002	Not detected	0.0002



Client Sample ID			MW-2R-2		MW-3	
York Sample ID			07040637-01		07040637-02	
Matrix			WATER		WATER	
Parameter	Method	Units	Results	MDL	Results	MDL
Metals, Total RCRA List Dissolved	SW846	mg/L				
Arsenic, dissolved			Not detected	0.010	Not detected	0.010
Barium, dissolved			0.068	0.005	0.080	0.005
Cadmium, dissolved			Not detected	0.005	Not detected	0.005
Chromium, dissolved			0.006	0.005	0.008	0.005
Lead, dissolved			Not detected	0.005	Not detected	0.005
Selenium, dissolved			Not detected	0.010	Not detected	0.010
Silver, dissolved			Not detected	0.005	Not detected	0.005
Mercury, Dissolved	SW-7470	mg/L	Not detected	0.0002	Not detected	0.0002

Client Sample ID			MW-4		MW-5R	
York Sample ID			07040637-03		07040637-04	
Matrix			WATER		WATER	
Parameter	Method	Units	Results	MDL	Results	MDL
Volatiles, 8021+MTBE	SW846-8260	ug/L				
1,1,1,2-Tetrachloroethane			Not detected	5.0	Not detected	5.0
1,1,1-Trichloroethane		T	Not detected	5.0	Not detected	5.0
1,1,2,2-Tetrachloroethane			Not detected	5.0	Not detected	5.0
1,1,2-Trichloroethane			Not detected	5.0	Not detected	5.0
1,1-Dichloroethane			Not detected	5.0	Not detected	5.0
1,1-Dichloroethylene			Not detected	5.0	Not detected	5.0
1,1-Dichloropropylene			Not detected	5.0	Not detected	5.0
1,2,3-Trichlorobenzene			Not detected	5.0	Not detected	5.0
1,2,3-Trichloropropane			Not detected	5.0	Not detected	5.0
1,2,4-Trichlorobenzene			Not detected	5.0	Not detected	5.0
1,2,4-Trimethylbenzene			Not detected	5.0	Not detected	5.0
1,2-Dibromo-3-chloropropane			Not detected	5.0	Not detected	5.0
1,2-Dibromoethane			Not detected	5.0	Not detected	5.0
1,2-Dichlorobenzene			Not detected	5.0	Not detected	5.0
1,2-Dichloroethane			Not detected	5.0	Not detected	5.0
1,2-Dichloroethylene (Total)			Not detected	5.0	Not detected	5.0
1,2-Dichloropropane			Not detected	5.0	Not detected	5.0
1,3,5-Trimethylbenzene			Not detected	5.0	Not detected	5.0
1,3-Dichlorobenzene			Not detected	5.0	Not detected	5.0
1,3-Dichloropropane			Not detected	5.0	Not detected	5.0
1,4-Dichlorobenzene			Not detected	5.0	Not detected	5.0
2,2-Dichloropropane			Not detected	5.0	Not detected	5.0
2-Chlorotoluene			Not detected	5.0	Not detected	5.0
4-Chlorotoluene			Not detected	5.0	Not detected	5.0
Benzene			Not detected	5.0	Not detected	5.0
Bromobenzene			Not detected	5.0	Not detected	5.0
Bromochloromethane			Not detected	5.0	Not detected	5.0
Bromodichloromethane			Not detected	5.0	Not detected	5.0
Bromoform			Not detected	5.0	Not detected	5.0
Bromomethane			Not detected	5.0	Not detected	5.0
Carbon tetrachloride			Not detected	5.0	Not detected	5.0
Chlorobenzene			Not detected	5.0	Not detected	5.0
Chloroethane			Not detected	5.0	Not detected	5.0
Chloroform			Not detected	5.0	Not detected	5.0



Client Sample ID			MW-4		MW-5R	
York Sample ID			07040637-03		07040637-04	
Matrix			WATER		WATER	
Parameter	Method	Units	Results	MDL	Results	MDL
Chloromethane			Not detected	5.0	Not detected	5.0
cis-1,3-Dichloropropylene			Not detected	5.0	Not detected	5.0
Dibromochloromethane			Not detected	5.0	Not detected	5.0
Dibromomethane			Not detected	5.0	Not detected	5.0
Dichlorodifluoromethane			Not detected	5.0	Not detected	5.0
Ethylbenzene			Not detected	5.0	Not detected	5.0
Hexachlorobutadiene			Not detected	5.0	Not detected	5.0
Isopropylbenzene			Not detected	5.0	Not detected	5.0
Methyl tert-butyl ether (MTBE)			Not detected	5.0	Not detected	5.0
Methylene chloride			Not detected	5.0	Not detected	5.0
Naphthalene			Not detected	5.0	Not detected	5.0
n-Butylbenzene			Not detected	5.0	Not detected	5.0
n-Propylbenzene	·····		Not detected	5.0	Not detected	5.0
o-Xylene			Not detected	5.0	Not detected	5.0
p- & m-Xylenes			Not detected	5.0	Not detected	5.0
p-Isopropyltoluene			Not detected	5.0	Not detected	5.0
sec-Butylbenzene			Not detected	5.0	Not detected	5.0
Styrene			Not detected	5.0	Not detected	5.0
tert-Butylbenzene			Not detected	5.0	Not detected	5.0
Tetrachloroethylene			Not detected	5.0	Not detected	5.0
Toluene			Not detected	5.0	Not detected	5.0
trans-1,3-Dichloropropylene			Not detected	5.0	Not detected	5.0
Trichloroethylene			Not detected	5.0	Not detected	5.0
Trichlorofluoromethane			Not detected	5.0	Not detected	5.0
Vinyl chloride			Not detected	5.0	Not detected	5.0
Metals, Total RCRA List	SW846-6010B	mg/L				
Arsenic, total			Not detected	0.004	Not detected	0.004
Barium, total			0.110	0.005	0.256	0.005
Cadmium, total			Not detected	0.005	Not detected	0.005
Chromium, total			0.010	0.005	0.039	0.005
Lead, total			0.014	0.003	Not detected	0.003
Selenium, total			Not detected	0.005	Not detected	0.005
Silver, total			Not detected	0.005	Not detected	0.005
Mercury	SW846-7470	mg/L	Not detected	0.0002	Not detected	0.0002
Metals, Total RCRA List Dissolved	SW846	mg/L				
Arsenic, dissolved			Not detected	0.010	Not detected	0.010
Barium, dissolved			0.099	0.005	0.252	0.005
Cadmium, dissolved			Not detected	0.005	Not detected	0.005
Chromium, dissolved			0.009	0.005	0.038	0.005
Lead, dissolved			Not detected	0.005	Not detected	0.005
Selenium, dissolved			Not detected	0.010	Not detected	0.010
Silver, dissolved			Not detected	0.005	Not detected	0.005
Mercury, Dissolved	SW-7470	mg/L	Not detected	0.0002	Not detected	0.0002



Client Sample ID	1	1	MW-6	
York Sample ID			07040637-05	
Matrix	· · ·····	· · · · · · · · · · · · · · · · · · ·	WATER	
Parameter	Method	Units	Results	MDL
Volatiles, 8021+MTBE	SW846-8260	ug/L		
1,1,1,2-Tetrachloroethane		<u> </u>	Not detected	5.0
1,1,1-Trichloroethane	· · · · · · · · · · · · · · · · · · ·		Not detected	5.0
1,1,2,2-Tetrachloroethane			Not detected	5.0
1,1,2-Trichloroethane			Not detected	5.0
1,1-Dichloroethane			Not detected	5.0
1,1-Dichloroethylene			Not detected	5.0
1,1-Dichloropropylene	1		Not detected	5.0
1,2,3-Trichlorobenzene			Not detected	5.0
1,2,3-Trichloropropane		1	Not detected	5.0
1,2,4-Trichlorobenzene			Not detected	5.0
1,2,4-Trimethylbenzene			Not detected	5.0
1,2-Dibromo-3-chloropropane			Not detected	5.0
1,2-Dibromoethane			Not detected	5.0
1,2-Dichlorobenzene			Not detected	5.0
1,2-Dichloroethane			Not detected	5.0
1,2-Dichloroethylene (Total)			Not detected	5.0
1,2-Dichloropropane			Not detected	5.0
1,3,5-Trimethylbenzene			Not detected	5.0
1,3-Dichlorobenzene			Not detected	5.0
1,3-Dichloropropane			Not detected	5.0
1,4-Dichlorobenzene			Not detected	5.0
2,2-Dichloropropane			Not detected	5.0
2-Chlorotoluene			Not detected	5.0
4-Chlorotoluene			Not detected	5.0
Benzene			Not detected	5.0
Bromobenzene			Not detected	5.0
Bromochloromethane			Not detected	5.0
Bromodichloromethane			Not detected	5.0
Bromoform			Not detected	5.0
Bromomethane			Not detected	5.0
Carbon tetrachloride			Not detected	5.0
Chlorobenzene			Not detected	5.0
Chloroethane			Not detected	5.0
Chloroform			Not detected	5.0
Chloromethane			Not detected	5.0
cis-1,3-Dichloropropylene			Not detected	5.0
Dibromochloromethane			Not detected	5.0
Dibromomethane			Not detected	5.0
Dichlorodifluoromethane			Not detected	5.0
Ethylbenzene			Not detected	5.0
Hexachlorobutadiene			Not detected	5.0
Isopropylbenzene			Not detected	5.0
Methyl tert-butyl ether (MTBE)			Not detected	5.0
Methylene chloride			Not detected	5.0
Naphthalene			Not detected	5.0
n-Butylbenzene			Not detected	5.0
n-Propylbenzene			Not detected	5.0
o-Xylene			Not detected	5.0
p- & m-Xylenes			Not detected	5.0
p-Isopropyltoluene			Not detected	5.0



Client Sample ID			MW-6	
York Sample ID			07040637-05	
Matrix		<u> </u>	WATER	
Parameter	Method	Units	Results	MDL
sec-Butylbenzene			Not detected	5.0
Styrene			Not detected	5.0
tert-Butylbenzene			Not detected	5.0
Tetrachloroethylene			Not detected	5.0
Toluene			Not detected	5.0
trans-1,3-Dichloropropylene			Not detected	5.0
Trichloroethylene			Not detected	5.0
Trichlorofluoromethane			Not detected	5.0
Vinyl chloride			Not detected	5.0
Metals, Total RCRA List	SW846-6010B	mg/L		
Arsenic, total			Not detected	0.004
Barium, total			0.201	0.005
Cadmium, total			Not detected	0.005
Chromium, total			0.008	0.005
Lead, total			Not detected	0.003
Selenium, total			Not detected	0.005
Silver, total			Not detected	0.005
Mercury	SW846-7470	mg/L	Not detected	0.0002
Metals, Total RCRA List Dissolved	SW846	mg/L		
Arsenic, dissolved			Not detected	0.010
Barium, dissolved			0.191	0.005
Cadmium, dissolved			Not detected	0.005
Chromium, dissolved			0.008	0.005
Lead, dissolved			Not detected	0.005
Selenium, dissolved			Not detected	0.010
Silver, dissolved			Not detected	0.005
Mercury, Dissolved	SW-7470	mg/L	Not detected	0.0002

#### Units Key:

For Waters/Liquids: mg/L = ppm ; ug/L = ppb

For Soils/Solids: mg/kg = ppm ; ug/kg = ppb

# Notes for York Project No. 07040637

- 1. The MDL (Minimum Detectable Limit) reported is adjusted for any dilution necessary due to the levels of target and/or nontarget analytes and matrix interference. This MDL is the <u>REPORTING LIMIT</u> and is based upon the lowest standard utilized for calibration where applicable.
- 2. Samples are retained for a period of thirty days after submittal of report, unless other arrangements are made.
- 3. York's liability for the above data is limited to the dollar value paid to York for the referenced project.
- 4. This report shall not be reproduced without the written approval of York Analytical Laboratories, Inc.
- 5. All samples were received in proper condition for analysis with proper documentation.
- 6. All analyses conducted met method or Laboratory SOP requirements.
- 7. It is noted that no analyses reported herein were subcontracted to another laboratory.

Approved By: Robert Q. Bradley Managing Director

Date: 4/27/2007



	YORK						Page 1 o		ľ –
Analyti	ical Laboratories, Inc.				-			101 may	
12(	) Research Drive			<b>Field</b>	I Ché	ain-of-Custo	dv Recol		
Str 203.325.137	atford, CT 06615 1 FAX 203.357-0166	i			<b>)</b> 1				
U	ompany Name	Re	port to:	Invoice t		Project ID/No.	m X Y		T
Ecosys	stems Strategies Inc.	Adá	am Lee	BRENDA	4	СР9920.81	Samples Collected	by (signature) .ee	
Sample No.	Location/ID		Date Sampled	Sample Water Soil	Matrix Air  Other	Analyses Reque	Name (pri ested	nted) Container Desc.	- T
	MW-2R-2		4/20/2007	×		VOCs (8021) + MTBE , Total and Di	issolved RCRA Metals	40 mL vial (x2), 1 L Amber jar (x3	~
	MW-3		4/20/2007	×		VOCs (8021) + MTBE , Total and Di	issolved RCRA Metais	40 mL vial (x2), 1 L Amber jar (x3	
	MW-4		4/20/2007	×		VOCs (8021) + MTBE , Total and Di	issolved RCRA Metals	40 mL vial (x2), 1 L Amber jar (x3	<u> </u>
	MW-5R		4/20/2007	×		VOCs (8021) + MTBE , Total and Di	issolved RCRA Metals	40 mL vial (x2), 1 L Amber jar (x3	<u> </u>
	9-MM		4/20/2007	×		VOCs (8021) + MTBE , Total and Di	issolved RCRA Metals	40 mL vial (x2), 1 L Amber jar (x3	<u> </u>
									T
									<b>T</b>
Chain-of-Cu	ustody Record		Ċ	Il La Ca	~	1/2 3.50 (~ X_		1/2 B 20/7	8 ~
Bottles F	telinquished from Lab by	Date/Time	Sample	s Relinquished by		Date/Time	Collector of the second	1 D' CERTANN	
Bottle Comments/	ss received in field by Special Instructions	Date/Time	Sample	s Relinquished by		Date/Time Saupples rece	ived in LAB by / /	Date/Time	<u> </u>
						I UU IIIIAN	und Time Requested- Requested: DATE DUI	<u>Specify Date Expected</u> E FOR RUSH:	
						×	STANDARD	RUSH(Define)	II