

APPENDIX VII
NYCDEP Information

JOHN NASO, JR.
WILLIAM K. BECKMAN
DAN C. BUZEA
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FRANK J. GETCHELL
CHARLES W. KREITLER
JEFFREY B. LENNOX
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TIMOTHY L. KENYON
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DAVID B. TERRY
MATTHEW P. PERAMAKI

R. G. SLAYBACK
JOHN B. ASHWORTH

LEGGETTE, BRASHEARS & GRAHAM, INC.

PROFESSIONAL GROUND-WATER AND ENVIRONMENTAL ENGINEERING SERVICES

110 CORPORATE PARK DRIVE, SUITE 112
WHITE PLAINS, NY 10604
914-694-5711
FAX 914-694-5744
www.lbgweb.com

April 14, 2008

New York City Department of
Environmental Protection
Inspection and Permitting Section
Bureau of Wastewater Treatment
96-05 Horace Harding Expressway, 1st Floor
Low-Rise Building
Corona, NY 11368

JOHN M. BENVEGNA
JOHN L. BOGNAR
KIMBERLY R. BLOMKER
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ROY SILBERSTEIN
PAUL M. JOBMANN
BRIAN C. KIMPEL
JOHN R. DIEGO
KEITH J. SHORTSLEEVE
MICHAEL J. SUSCA
BRAD L. CROSS
MITCHELL W. KANNENBERG

RE: Ground-Water Treatment System
Request for Permit Renewal &
NYC DEP Parameter Sampling
Fyn Paint & Lacquer Co., Inc.
Brooklyn, New York
File Case # C-4136

Dear Case Representative:

The following letter is being submitted to your attention on behalf of the Fyn Paint & Lacquer Co., Inc. (Fyn Paint) by Leggette, Brashears & Graham, Inc. (LBG). LBG is an authorized representative of Fyn Paint as per the attached letter. The Wastewater Quality Control (WQC) application for the above listed site was approved in accordance with the New York City Department of Environmental Protection (NYCDEP) procedures for ground-water discharge to the sanitary sewer or combined sewer on March 15, 2007. As is stipulated in the Letter of Approval from the Department of Wastewater Treatment, LBG provided notification to the Bureau of Customer Service prior to commencement of discharge.

As the permit was valid up until March 14, 2008, Fyn Paint requests that the permit be renewed for another 1 year period. The groundwater treatment system is currently inactive pending receipt of notification of permit renewal. All information submitted for the letter of approval issued March 15, 2007 remains the same. The ground-water treatment system remains unchanged from the specifications outlined in the application and consists of; an initial treatment of the ground water through the use of an air stripper; and, a secondary carbon polish to ensure that the effluent discharge meets NYCDEP sanitary sewer discharge limits.

Since the commencement of the ground-water treatment system in March of 2007, the system was monitored once per week for the first month of operation and subsequently has been monitored approximately once per month. This monitoring consisted of sampling and analysis of pre-treated and effluent water for volatile organic compounds (VOCs). However, during 2007, the treatment system was not operational continuously. A detailed *Summary of the 2007 Treatment System Operation* was submitted to your Division in January 2008. Of note, there was an oversight on the performance of the NYC DEP analytical requirements of quarterly analysis of discharge parameters. The sampling schedule has been reviewed in detail with field sampling personnel and subsequent sampling in 2008-2009 will comply with all NYC DEP analytical requirements (analysis for full required parameters on a quarterly basis and submission directly to the Bureau of Wastewater Treatment within 21 days).

April 11, 2008

As is required by the NYC DEP, laboratory analysis was performed on the treatment system effluent sample (treated water being discharged to the combined sewer) encompassing the parameters of which the NYC DEP has discharge limits established. This sample was collected on February 4 & 5, 2008. A summary of the contaminant concentrations detected in the effluent water is presented on the attached Table 1. This table also indicates the applicable units for each parameter as well as the established NYC DEP Daily Limits. In addition to the summary table, a copy of the laboratory analytical report is attached. Additional effluent samples are going to be collected and analyzed for VOCs and metals in accordance with the required analytical methods listed in 40 C.F.R. pt. 136. (These analytical methods include 245.1 for mercury; 200.7 for total metals; and, 624 for VOCs) These laboratory results will be submitted to the Bureau of Wastewater Treatment as soon as the analysis is completed.

The liquid phase carbon was replaced with fresh carbon on April 3, 2008. Additionally, the schedule for the treatment system sampling, consisting of monthly sampling events, will continue throughout 2008 and 2009. Also of note, the anticipated annual discharge of **1,576,800 gallons** (as listed on the initial discharge permit for a rate of 5 GPM) was not reached. As of March 19, 2008, a total volume of **594,140 gallons** of treated groundwater was discharged to the sanitary sewer. The treatment system was shut down on March 19, 2008 following the collection of the monthly samples. This system shut-down took place 3 and ½ days following the expiration date of the discharge permit (upon realized that the discharge permit expired). As such, approximately 5,040 gallons of treated groundwater was discharged to the sanitary sewer after the expiration of the discharge permit on March 15, 2008.

The treated groundwater discharge will not be restarted until LBG receives notification of permit renewal from the NYC DEP. If you have any questions, please contact me at (914) 694-5711 or the owner of the site, Mr. William Feinstein at (718) 388-4130.

Very truly yours,

LEGGETTE, BRASHEARS & GRAHAM, INC.



Sean Groszkowski
Associate

Reviewed By:



Dan C. Buzea, CPG
Vice President

SCG:dmd

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FYN PAINT & LACQUER COMPANY
230 KENT AVENUE
WILLIAMSBURG, BROOKLYN, NEW YORK

Ground-Water Treatment System
Summary of Effluent Parameters & NYC DEP¹⁾ Limits
Sample Collected February 4 & 5, 2008

Parameter	Concentration	Units	NYC DEP Daily Limit
Non-Polar Materials	<5.0	mg/l ²⁾	50
pH	7.7	SU's ³⁾	5-11
Temperature	60	Degree °F	<150
Flash Point	>200	Degree °F	>140
Cadmium	<0.004	mg/l	2
Chromium (VI)	<0.01	mg/l	5
Copper	<0.025	mg/l	5
Lead	<0.0125	mg/l	2
Mercury	<0.002	mg/l	0.05
Nickel	<0.04	mg/l	3
Zinc	0.0315	mg/l	5
Benzene	<1.0	ppb ⁴⁾	134
Carbon Tetrachloride	<2.0	---	---
Chloroform	<2.0	---	---
1,4-Dichlorobenzene	<2.0	---	---
Ethylbenzene	<2.0	ppb	380
MTBE ²⁾	<2.0	ppb	50
Naphthalene	<5.0	ppb	47
Phenol	<11.0	---	---
Tetrachloroethylene (PCE)	<2.0	ppb	20
Toluene	4.3	ppb	74
1,2,4-Trichlorobenzene	<2.0	---	---
1,1,1-Trichloroethane	<2.0	---	---
Total Xylenes	<4.0	ppb	74
PCBs	<0.22	ppb	1
Total Suspended Solids (TSS)	66	mg/l	350

1) - New York City Department of Environmental Protection

2) - Milligrams per liter

3) - Standard Units

4) - Parts Per Billion

Note: Discharge at the Site is Less Than 10,000 Gallons Per Day (GPD)

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110 CORPORATE PARK DRIVE, SUITE 112
WHITE PLAINS, NY 10604
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May 1, 2008

Mr. Alex Castro
New York City Department of
Environmental Protection
Inspection and Permitting Section
Bureau of Wastewater Treatment
96-05 Horace Harding Expressway, 1st Floor
Low-Rise Building
Corona, NY 11368

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RE: Ground-Water Treatment System
Request for Permit Renewal
System Modification Explanation
Fyn Paint & Lacquer Co., Inc.
Brooklyn, New York
File Case # C-4136

Dear Mr. Castro:

The following letter is being submitted to your attention on behalf of the Fyn Paint & Lacquer Co., Inc. (Fyn Paint) by Leggette, Brashears & Graham, Inc. (LBG). LBG is an authorized representative of Fyn Paint as per the attached letter. The Wastewater Quality Control (WQC) application for the above listed site was approved, in accordance with the New York City Department of Environmental Protection's (NYCDEP) procedures for ground-water discharge to the sanitary sewer or combined sewer, on March 15, 2007. As is stipulated in the Letter of Approval from the Department of Wastewater Treatment, LBG provided notification to the Bureau of Customer Service prior to commencement of discharge.

A letter of request for renewal of the discharge permit was submitted to your office on April 14, 2008. Based on the laboratory analysis of the effluent water, toluene was detected at a concentration of 29 micrograms per liter (ug/l), which exceeds the allowed NYCDEP monthly discharge limit of 28 ug/l.

The groundwater treatment system initially treats groundwater through use of an air stripper to 'strip' volatile organic compounds (VOCs) from the water. After treatment by the air stripper, the water accumulates in a sump in the bottom of the air stripper. Once approximately 100 gallons of water accumulates in the sump, it is pumped via a transfer pump, through the granular activated carbon vessel and subsequently discharged to the sanitary sewer. The original configuration of the transfer pump was set for maximum flow through the carbon at a rate of approximately 20 gallons per minute (GPM). In order to address the issue of toluene exceeding the allowable discharge concentration, the treatment system was modified by decreasing the rate of the transfer pump. The transfer pump discharge rate was reduced to approximately 5 GPM, increasing the contact time between the groundwater and the carbon by a factor of four. The increased contact time enhances the effective absorption of VOCs by the carbon. The resulting

May 1, 2008

concentrations (following the modification to the treatment system) indicate that all VOCs meet the NYCDEP discharge limits. A table showing the VOC concentrations following the modification is attached. In addition to the reduction in the transfer pump discharge rate, a secondary liquid phase carbon vessel was installed after the primary carbon. This secondary carbon vessel was installed to ensure that, in the event there is breakthrough of VOCs (concentrations above the NYCDEP discharge limits) after the primary carbon, the groundwater will be treated by the secondary unit prior to discharge to the sanitary sewer.

The treatment system and subsequent treated groundwater discharge will not be restarted until LBG receives notification of permit renewal. If you have any questions, please contact me at (914) 694-5711 or the owner of the site, Mr. William Feinstein at (718) 388-4130.

Very truly yours,

LEGGETTE, BRASHEARS & GRAHAM, INC.



Sean Groszkowski
Associate

Reviewed By:



Dan C. Buzea, CPG
Vice President

SCG:dmd

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FYN PAINT & LACQUER COMPANY
230 KENT AVENUE
WILLIAMSBURG, BROOKLYN, NEW YORK

Ground-Water Treatment System
Summary of Effluent Parameters & NYC DEP¹⁾ Limits
Sample Collected April 14, 2008

Parameter	Concentration	Units	NYC DEP Daily Limit	NYC DEP Monthly Limit
Non-Polar Materials	*	mg/l ²⁾	50	---
pH	*	SU's ³⁾	5-11	---
Temperature	*	Degree °F	< 150	---
Flash Point	*	Degree °F	> 140	---
Cadmium	<0.004	mg/l	2	---
Chromium (VI)	*	mg/l	5	---
Copper	<0.025	mg/l	5	---
Lead	<0.012	mg/l	2	---
Mercury	<0.002	mg/l	0.05	---
Nickel	<0.04	mg/l	3	---
Zinc	4.6	mg/l	5	---
Benzene	<2.0	ppb ⁴⁾	134	57
Carbon Tetrachloride	<2.0	---	---	---
Chloroform	<2.0	---	---	---
1,4-Dichlorobenzene	*	---	---	---
Ethylbenzene	<2.0	ppb	380	142
MTBE ²⁾	*	ppb	50	---
Naphthalene	<5.0	ppb	47	19
Phenol	*	---	---	---
Tetrachloroethylene (PCE)	<2.0	ppb	20	---
Toluene	29	ppb	74	28
1,2,4-Trichlorobenzene	*	---	---	---
1,1,1-Trichloroethane	<2.0	---	---	---
Total Xylenes	<4.0	ppb	74	28
PCBs	*	ppb	1	---
Total Suspended Solids (TSS)	*	mg/l	350	---

1) - New York City Department of Environmental Protection

2) - Milligrams per liter

3) - Standard Units

4) - Parts Per Billion

Note: Discharge at the Site is Less Than 10,000 Gallons Per Day (GPD)

* - Concentration detected below NYC DEP limit on February 4 & 5, 2008 sampling events

FYN PAINT & LACQUER COMPANY
230 KENT AVENUE
WILLIAMSBURG, BROOKLYN, NEW YORK

Ground-Water Treatment System
Summary of Effluent Parameters & NYC DEP ¹⁾ Limits
Sample Collected April 30, 2008

Parameter	Concentration		Units	NYC DEP Daily Limit	NYC DEP Monthly Limit
	Mid-Carbon	Effluent			
Non-Polar Materials	*	*	mg/l ²⁾	50	---
pH	*	*	SU's ³⁾	5-11	---
Temperature	*	*	Degree °F	<150	---
Flash Point	*	*	Degree °F	>140	---
Cadmium	**	NA	mg/l	2	---
Chromium (VI)	*	*	mg/l	5	---
Copper	**	NA	mg/l	5	---
Lead	**	NA	mg/l	2	---
Mercury	**	NA	mg/l	0.05	---
Nickel	**	NA	mg/l	3	---
Zinc	**	NA	mg/l	5	---
Benzene	<2.0	<2.0	ppb ⁴⁾	134	57
Carbon Tetrachloride	<2.0	<2.0	---	---	---
Chloroform	<2.0	<2.0	---	---	---
1,4-Dichlorobenzene	<2.0	<2.0	---	---	---
Ethylbenzene	<2.0	<2.0	ppb	380	142
MTBE ²⁾	<2.0	<2.0	ppb	50	---
Naphthalene	**	NA	ppb	47	19
Phenol	*	*	---	---	---
Tetrachloroethylene (PCE)	<2.0	<2.0	ppb	20	---
Toluene	22	<2.0	ppb	74	28
1,2,4-Trichlorobenzene	<2.0	<2.0	---	---	---
1,1,1-Trichloroethane	<2.0	<2.0	---	---	---
Total Xylenes	<4.0	<4.0	ppb	74	28
PCBs	*	*	ppb	1	---
Total Suspended Solids (TSS)	*	*	mg/l	350	---

1) - New York City Department of Environmental Protection

2) - Milligrams per liter

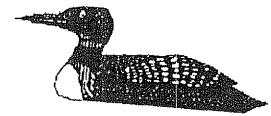
3) - Standard Units

4) - Parts Per Billion

Note: Discharge at the Site is Less Than 10,000 Gallons Per Day (GPD)

* - Concentration detected below NYC DEP limit on February 4 & 5, 2008 sampling events

** - Concentration detected below NYC DEP limit on April 14, 2008 sampling event



111 Herrick Street, Merrimack, NH 03054
TEL: (603) 424-2022 • FAX: (603) 429-8496
www.amrolabs.com

May 07, 2008

ANALYTICAL TEST RESULTS

Sean Groszkowski
Leggette, Brashears & Graham, Inc.
110 Corporate Park Drive
Suite 112
White Plains, NY 10604
TEL: 914-694-5711
FAX: 914-694-5744

Subject: FYN Paint

Workorder No.: 0805001

Dear Sean Groszkowski:

AMRO Environmental Laboratories Corp. received 2 samples on 5/1/2008 for the analyses presented in the following report.

AMRO is accredited in accordance with NELAC and certifies that these test results meet all the requirements of NELAC, where applicable, unless otherwise noted in the case narrative.

The enclosed Sample Receipt Checklist details the condition of your sample(s) upon receipt. Please be advised that any unused sample volume and sample extracts will be stored for a period of 60 days from sample receipt date (90 days for samples from New York). After this time, AMRO will properly dispose of the remaining sample(s). If you require further analysis, or need the samples held for a longer period, please contact us immediately.

This report consists of a total of 18 pages. This letter is an integral part of your data report. All results in this project relate only to the sample(s) as received by the laboratory and documented in the Chain-of-Custody. This report shall not be reproduced except in full, without the written approval of the laboratory. If you have any questions regarding this project in the future, please refer to the Workorder Number above.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Stewart".

Nancy Stewart
Vice President

State Certifications: NH (NELAC): 1001, MA: M-NH012, CT: PH-0758, NY: 11278 (NELAC), ME: NH012 and 1001, NJ: NH125, RI: 00105, U.S. Army Corps of Engineers (USACE), Naval Facilities Engineering Service Center (NFESC).

Hard copy of the State Certification is available upon request.

AMRO Environmental Laboratories Corp.

Date: 06-May-08

CLIENT: Leggette, Brashears & Graham, Inc.
Project: FYN Paint
Lab Order: 0805001
Date Received: 5/1/08

Work Order Sample Summary

Lab Sample ID	Client Sample ID	Collection Date	Collection Time
0805001-01A	Treatment System Mid-Carb	4/30/08	2:45 PM
0805001-02A	Treatment System Effluent	4/30/08	2:46 PM

AMRO Environmental Laboratories Corp.

06-May-08

DATES REPORT

Sample ID	Client Sample ID	Collection Date	Matrix	Analytical Test Name	Preparatory Test Name	Prep Date	Batch ID	TCLP Date
0805001-01A	Treatment System Mid-Carb on	4/30/08 2:45:00 PM	Groundwater	EPA 624 Volatile Organics in Wastewater		5/1/08 4/30/08	R39896	
0805001-02A	Treatment System Effluent	4/30/08 2:46:00 PM		EPA 624 Volatile Organics in Wastewater		5/1/08 4/30/08	R39889	

AMRO Environmental Laboratories Corporation
111 Herrick Street
Merrimack, NH 03054

CHAIN-OF-CUSTODY RECORD

Office: (603) 424-2022
Fax: (603) 429-8496
web: www.amrolabs.com

56869

Project No.:	Project Name: <i>FYN PAINT</i>	Project Manager: <i>SCOTT COOK</i>	Samplers (Signature): <i>[Signature]</i>	AMRO Project No.: <i>OY03001</i>													
				Remarks													
P.O. #:	Results Needed by:	Seal Intact?	Yes	No	N/A	REQUESTED ANALYSES											
QUOTE #:	Total # of Cont. & Size																
Sample ID:	Date/Time Sampled	Matrix	Grab Comp.														
TREATMENT System Mid - Larson	4/30/08 1445	G 12	X														
TREATMENT System Efficient	4/30/08 1446	G W	X														
Preservative: Cl-HCl, MeOH, NHNO3, S-H2SO4, Na-NaOH, O - Other																	
PRIORITY TURNAROUND TIME AUTHORIZATION																	
Before submitting samples for expedited TAT, you must have a coded AUTHORIZATION NUMBER																	
AUTHORIZATION No.: BY: <i>5-1-03 9:00</i>																	
PHONE #: (603) 644-5711 FAX #: (603) 644-5711																	
Send Results To: L & C <i>L&C</i> 10 Corporate Park Dr. Suite 112 Wilton, NY 10604																	
E-mail: <i>[Signature]</i>																	
Date/Time Received By: <i>5-1-03 9:00</i>																	
AMRO Presumptive Certainty Required? YES <input type="checkbox"/> NO <input type="checkbox"/>																	
MCP Methods Needed: YES <input type="checkbox"/> NO <input type="checkbox"/> S-1 <input type="checkbox"/> GW-1 <input type="checkbox"/> S-2 <input type="checkbox"/> GW-2 <input type="checkbox"/> S-3 <input type="checkbox"/> GW-3 <input type="checkbox"/> Other: <i>[Signature]</i>																	
AMRO policy requires notification in writing to the laboratory in cases where the samples were collected from highly contaminated sites.																	
KNOWN SITE CONTAMINATION:																	
SHEET 1 OF <i>[Signature]</i> AMROCC2004 Rev.3 08/18/04																	

Please print clearly, legibly and completely. Samples can not be logged in and the turnaround time clock will not start until any ambiguities are resolved.

Yellow: Client Copy

AMRO policy requires notification in writing to the laboratory in cases where the samples were collected from highly contaminated sites.

KNOWN SITE CONTAMINATION:

Samples arriving after 12:00 noon will be tracked and billed as received on the following day.

SAMPLE RECEIPT CHECKLIST

111 Herrick Street
Merrimack, NH 03054
(603) 424-2022

Client: <i>LKG</i>	Project Name: <i>FYN PAINT</i>	AMRO ID: <i>OP05001</i>
Ship via: (circle one) <input checked="" type="checkbox"/> Fed Ex, <input type="checkbox"/> UPS, AMRO Courier,	Date Rec.: <i>5-1-08</i>	Date Due: <i>5-1-08</i>
Hand Del., Other Courier, Other:		
Items to be Checked Upon Receipt		
1. Army Samples received in individual plastic bags? 2. Custody Seals present? 3. Custody Seals Intact? 4. Air Bill included in folder if received? 5. Is COC included with samples? 6. Is COC signed and dated by client? 7. Laboratory receipt temperature. TEMP = <i>23°</i> Samples rec. with ice <input checked="" type="checkbox"/> ice packs <input checked="" type="checkbox"/> neither 8. Were samples received the same day they were sampled? Is client temperature $4^{\circ}\text{C} \pm 2^{\circ}\text{C}$? If no obtain authorization from the client for the analyses. Client authorization from: _____ Date: _____ Obtained by: _____		
9. Is the COC filled out correctly and completely? 10. Does the info on the COC match the samples? 11. Were samples rec. within holding time? 12. Were all samples properly labeled? 13. Were all samples properly preserved? 14. Were proper sample containers used? 15. Were all samples received intact? (none broken or leaking) 16. Were VOA vials rec. with no air bubbles? 17. Were the sample volumes sufficient for requested analysis? 18. Were all samples received?		
19. VPH and VOA Soils only: Sampling Method VPH (circle one): M=Methanol, E=EnCore (air-tight container) Sampling Method VOA (circle one): M=Methanol, SB=Sodium Bisulfate, E=EnCore, B=Bulk If M or SB: Does preservative cover the soil? If NO then client must be faxed. Does preservation level come close to the fill line on the vial? If NO then client must be faxed. Were vials provided by AMRO? If NO then weights MUST be obtained from client Was dry weight aliquot provided? If NO then fax client and inform the VOA lab ASAP.		
20. Subcontracted Samples: What samples sent: Where sent: Date: Analysis: TAT:		
21. Information entered into: Internal Tracking Log? Dry Weight Log? Client Log? Composite Log? Filtration Log?		
Received By: <i>NM</i>	Date: <i>5-1-08</i>	Logged in By: <i>MG</i>
Labeled By: <i>MG</i>	Date: <i>5-1-08</i>	Checked By: <i>AD</i>
Date: <i>5-1-08</i>		

AMRO Environmental
Laboratories Corporation

111 Herrick Street
Merrimack, NH 03054
(603) 424-2022

Please Circle if:

Sample= Soil

Sample=Waste

AMRO ID:

0805001

^a = if the laboratory preserves the drinking water sample (s) for EPA Method 200 series, sample (s) should be held at least 16 hours prior to analysis

pH Checked By: _____ Date: _____ pH adjusted By: _____ Date: _____

oH Checked By: _____ Date: _____ oH adjusted (16hrs) By: _____ Date: _____

CLIENT: Leggette, Brashears & Graham, Inc.
Project: FYN Paint
Lab Order: 0805001

CASE NARRATIVE**GC/MS VOLATILES:**

1. A Laboratory Control Sample (LCS) was performed on 04/30/08 (Batch ID: R39889).
 - 1.1 The % Recovery for 1 analyte out of 42 analytes in the LCS was outside the laboratory control limits.
2. A Laboratory Control Sample (LCS) was performed on 05/01/08 (Batch ID: R39896).
 - 2.1 The % Recovery for 2 analytes out of 42 analytes in the LCS was outside the laboratory control limits.
3. The surrogate 1,2-Dichloroethane-d4 recovered above the laboratory control limit in the method blank MB-R39896 and the LCS-R39896.
4. The surrogate 4-Bromofluorobenzene recovered below the laboratory control limit in sample Treatment System Effluent (0805001-02A).

DATA COMMENT PAGE

Organic Data Qualifiers

- ND Indicates compound was analyzed for, but not detected at or above the reporting limit.
- J Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed, or when the data indicates the presence of a compound that meets the identification criteria but the result is less than the sample quantitation limit but greater than the method detection limit.
- H Method prescribed holding time exceeded.
- E This flag identifies compounds whose concentrations exceed the calibration range of the instrument for that specific analysis.
- B This flag is used when the analyte is found in the associated blank as well as in the sample.
- R RPD outside accepted recovery limits
- RL Reporting limit; defined as the lowest concentration the laboratory can accurately quantitate.
- S Spike Recovery outside accepted recovery limits.
- # See Case Narrative

Micro Data Qualifiers

- TNTC Too numerous to count

Inorganic Data Qualifiers

- ND or U Indicates element was analyzed for, but not detected at or above the reporting limit.
- J Indicates a value greater than or equal to the method detection limit, but less than the quantitation limit.
- H Indicates analytical holding time exceedance.
- B Indicates that the analyte is found in the associated blank, as well as in the sample.
- MSA Indicates value determined by the Method of Standard Addition
- E This flag identifies compounds whose concentrations exceed the calibration range of the instrument for that specific analysis.
- R RPD outside accepted recovery limits
- RL Reporting limit; defined as the lowest concentration the laboratory can accurately quantitate.
- S Spike Recovery outside accepted recovery limits.
- W Post-digestion spike for Furnace AA analysis is out of control limits (85-115), while sample absorbance is less than 50% of spike absorbance.
- *
- + Duplicate analysis not within control limits.
- Indicates the correlation coefficient for the Method of Standard Addition is less than 0.995
- # See Case Narrative

Report Comments:

1. Soil, sediment and sludge sample results are reported on a "dry weight" basis.
2. Reporting limits are adjusted for sample size used, dilutions and moisture content, if applicable.

AMRO Environmental Laboratories Corp.

Date: 02-May-08

CLIENT: Leggette, Brashears & Graham, Inc.
 Lab Order: 0805001
 Project: FYN Paint
 Lab ID: 0805001-01A

Client Sample Treatment System Mid-Carbon
 Collection 4/30/2008 2:45:00 PM
 Matrix: GROUNDWATER

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
VOLATILE ORGANICS IN WASTEWATER	E624					Analyst: NM
Benzene	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Bromodichloromethane	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Bromoform	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Bromomethane	ND	5.0		µg/L	1	5/1/2008 9:31:00 AM
Carbon tetrachloride	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Chlorobenzene	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Chloroethane	ND	5.0		µg/L	1	5/1/2008 9:31:00 AM
2-Chloroethyl vinyl ether	ND	10		µg/L	1	5/1/2008 9:31:00 AM
Chloroform	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Chloromethane	ND	5.0		µg/L	1	5/1/2008 9:31:00 AM
Dibromochloromethane	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
1,2-Dichlorobenzene	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
1,3-Dichlorobenzene	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
1,4-Dichlorobenzene	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
1,1-Dichloroethane	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
1,2-Dichloroethane	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
1,1-Dichloroethene	ND	1.0		µg/L	1	5/1/2008 9:31:00 AM
cis-1,2-Dichloroethene	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
trans-1,2-Dichloroethene	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
1,2-Dichloropropane	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
cis-1,3-Dichloropropene	ND	1.0		µg/L	1	5/1/2008 9:31:00 AM
trans-1,3-Dichloropropene	ND	1.0		µg/L	1	5/1/2008 9:31:00 AM
Ethylbenzene	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Methylene chloride	ND	5.0		µg/L	1	5/1/2008 9:31:00 AM
1,1,2,2-Tetrachloroethane	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Tetrachloroethene	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Toluene	22	2.0		µg/L	1	5/1/2008 9:31:00 AM
1,1,1-Trichloroethane	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
1,1,2-Trichloroethane	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Trichloroethene	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Trichlorofluoromethane	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Vinyl chloride	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Acetone	770	100		µg/L	10	5/1/2008 11:47:00 AM
2-Butanone	ND	10		µg/L	1	5/1/2008 9:31:00 AM
Carbon disulfide	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
1,2-Dibromoethane	ND	1.0		µg/L	1	5/1/2008 9:31:00 AM
2-Hexanone	ND	10		µg/L	1	5/1/2008 9:31:00 AM
4-Methyl-2-Pentanone	ND	10		µg/L	1	5/1/2008 9:31:00 AM
Methyl tert-butyl ether	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Styrene	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Vinyl acetate	ND	10		µg/L	1	5/1/2008 9:31:00 AM
m,p-Xylene	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
o-Xylene	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
1,2,4-Trichlorobenzene	ND	2.0		µg/L	1	5/1/2008 9:31:00 AM
Surr: Dibromofluoromethane	97.9	85-116		%REC	1	5/1/2008 9:31:00 AM
Surr: 1,2-Dichloroethane-d4	95.5	77-127		%REC	1	5/1/2008 9:31:00 AM
Surr: Toluene-d8	95.9	86-114		%REC	1	5/1/2008 9:31:00 AM
Surr: 4-Bromofluorobenzene	91.4	79-117		%REC	1	5/1/2008 9:31:00 AM

AMRO Environmental Laboratories Corp.

Date: 02-May-08

CLIENT: Leggette, Brashears & Graham, Inc.
 Lab Order: 0805001
 Project: FYN Paint
 Lab ID: 0805001-02A

Client Sample Treatment System Effluent
 Collection 4/30/2008 2:46:00 PM
 Matrix: GROUNDWATER

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
VOLATILE ORGANICS IN WASTEWATER	E624					Analyst: NM
Benzene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Bromodichloromethane	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Bromoform	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Bromomethane	ND	5.0		µg/L	1	5/1/2008 10:05:00 AM
Carbon tetrachloride	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Chlorobenzene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Chloroethane	ND	5.0		µg/L	1	5/1/2008 10:05:00 AM
2-Chloroethyl vinyl ether	ND	10		µg/L	1	5/1/2008 10:05:00 AM
Chloroform	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Chloromethane	ND	5.0		µg/L	1	5/1/2008 10:05:00 AM
Dibromochloromethane	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
1,2-Dichlorobenzene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
1,3-Dichlorobenzene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
1,4-Dichlorobenzene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
1,1-Dichloroethane	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
1,2-Dichloroethane	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
1,1-Dichloroethene	ND	1.0		µg/L	1	5/1/2008 10:05:00 AM
cis-1,2-Dichloroethene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
trans-1,2-Dichloroethene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
1,2-Dichloropropane	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
cis-1,3-Dichloropropene	ND	1.0		µg/L	1	5/1/2008 10:05:00 AM
trans-1,3-Dichloropropene	ND	1.0		µg/L	1	5/1/2008 10:05:00 AM
Ethylbenzene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Methylene chloride	ND	5.0		µg/L	1	5/1/2008 10:05:00 AM
1,1,2,2-Tetrachloroethane	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Tetrachloroethene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Toluene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
1,1,1-Trichloroethane	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
1,1,2-Trichloroethane	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Trichloroethene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Trichlorofluoromethane	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Vinyl chloride	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Acetone	210	100		µg/L	10	5/2/2008 12:21:00 AM
2-Butanone	ND	10		µg/L	1	5/1/2008 10:05:00 AM
Carbon disulfide	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
1,2-Dibromoethane	ND	1.0		µg/L	1	5/1/2008 10:05:00 AM
2-Hexanone	ND	10		µg/L	1	5/1/2008 10:05:00 AM
4-Methyl-2-Pentanone	ND	10		µg/L	1	5/1/2008 10:05:00 AM
Methyl tert-butyl ether	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Styrene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Vinyl acetate	ND	10		µg/L	1	5/1/2008 10:05:00 AM
m,p-Xylene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
o-Xylene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
1,2,4-Trichlorobenzene	ND	2.0		µg/L	1	5/1/2008 10:05:00 AM
Surr: Dibromofluoromethane	98.4	85-116		%REC	1	5/1/2008 10:05:00 AM
Surr: 1,2-Dichloroethane-d4	96.9	77-127		%REC	1	5/1/2008 10:05:00 AM
Surr: Toluene-d8	95.2	86-114		%REC	1	5/1/2008 10:05:00 AM
Surr: 4-Bromofluorobenzene	72.1	79-117	S	%REC	1	5/1/2008 10:05:00 AM

AMRO Environmental Laboratories Corp.

Date: 07-May-08

CLIENT: Leggette, Brashears & Graham, Inc.
Work Order: 0805001
Project: FYN Paint

QC SUMMARY REPORT
Method Blank

Sample ID: mb-04/30/08 Batch ID: R39889 Test Code: E624

Run ID: V-3_080430A Units: µg/L

Client ID:

Analysis Date 4/30/2008 1:31:00 PM Prep Date: 4/30/2008

SeqNo: 667050

Analyte	QC Sample Result	RL	Units	QC Spike Original Sample		%REC	LowLimit	HighLimit	Original Sample or MS Result	%RPD	RPDLimit	Qu
				Amount	Result							
Benzene	ND	2.0	µg/L									
Bromodichloromethane	ND	2.0	µg/L									
Bromoform	ND	2.0	µg/L									
Bromomethane	ND	5.0	µg/L									
Carbon tetrachloride	ND	2.0	µg/L									
Chlorobenzene	ND	2.0	µg/L									
Chloroethane	ND	5.0	µg/L									
Chloroform	ND	2.0	µg/L									
Chloromethane	ND	5.0	µg/L									
Dibromochloromethane	ND	2.0	µg/L									
1,2-Dichlorobenzene	ND	2.0	µg/L									
1,3-Dichlorobenzene	ND	2.0	µg/L									
1,4-Dichlorobenzene	ND	2.0	µg/L									
1,1-Dichloroethane	ND	2.0	µg/L									
1,2-Dichloroethane	ND	2.0	µg/L									
1,1-Dichloroethene	ND	1.0	µg/L									
cis-1,2-Dichloroethene	ND	2.0	µg/L									
trans-1,2-Dichloroethene	ND	2.0	µg/L									
1,2-Dichloropropane	ND	2.0	µg/L									
cis-1,3-Dichloropropene	ND	1.0	µg/L									
trans-1,3-Dichloropropene	ND	1.0	µg/L									
Ethylbenzene	ND	2.0	µg/L									
Methylene chloride	ND	5.0	µg/L									
1,1,2,2-Tetrachloroethane	ND	2.0	µg/L									
Tetrachloroethylene	ND	2.0	µg/L									

Qualifiers: ND - Not Detected at the Reporting Limit

J - Analyte detected below quantitation limits

R - RPD outside accepted recovery limits

S - Spike Recovery outside accepted recovery limits

B - Analyte detected in the associated Method Blank

NA - Not applicable where J values or ND results occur

RL - Reporting Limit; defined as the lowest concentration the laboratory can accurately quantitate.

AMRO Environmental Laboratories Corp.

Date: 07-May-08

QC SUMMARY REPORT

Method Blank

CLIENT: Leggette, Brashears & Graham, Inc.
Work Order: 0805001
Project: FYN Paint

	ND	2.0	µg/L
Toluene	ND	2.0	µg/L
1,1,1-Trichloroethane	ND	2.0	µg/L
1,1,2-Trichloroethane	ND	2.0	µg/L
Trichloroethene	ND	2.0	µg/L
Trichlorofluoromethane	ND	2.0	µg/L
Vinyl chloride	ND	2.0	µg/L
Acetone	ND	10	µg/L
2-Butanone	ND	10	µg/L
Carbon disulfide	ND	2.0	µg/L
1,2-Dibromoethane	ND	1.0	µg/L
2-Hexanone	ND	10	µg/L
4-Methyl-2-pentanone	ND	10	µg/L
Methyl tert-butyl ether	ND	2.0	µg/L
Styrene	ND	2.0	µg/L
Vinyl acetate	ND	10	µg/L
m,p-Xylene	ND	2.0	µg/L
c-Xylene	ND	2.0	µg/L
Surr: Dibromofluoromethane	23.84	2.0	µg/L
Surr: 1,2-Dichloroethane-d4	23.27	2.0	µg/L
Surr: Toluene-d8	24.33	2.0	µg/L
Surr: 4-Bromofluorobenzene	23.39	2.0	µg/L

Qualifiers: ND - Not Detected at the Reporting Limit

J - Analyte detected below quantitation limits

RL - Reporting Limit; defined as the lowest concentration the laboratory can accurately quantitate.

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

NA - Not applicable where J values or ND results occur

B - Analyte detected in the associated Method Blank

AMRO Environmental Laboratories Corp.

Date: 07-May-08

QC SUMMARY REPORT

Method Blank

CLIENT:	Leggette, Brashears & Graham, Inc.		
Work Order:	0805001		
Project:	FYN Paint		
Sample ID:	mb-05/01/08	Batch ID:	R39896
Client ID:		Test Code:	E624
		Run ID:	V-1_080501A
		Units:	µg/L
Analyte	QC Sample Result	RL	Units
	QC Spike Amount	Original Sample Amount	Result
	%REC	%REC	%REC
	LowLimit	HighLimit	LowLimit
	Original Sample or MS Result	%MS Result	%RPD
			RPDLimit
			Quic
Benzene	ND	2.0	µg/L
Bromodichloromethane	ND	2.0	µg/L
Bromoform	ND	2.0	µg/L
Bromomethane	ND	5.0	µg/L
Carbon tetrachloride	ND	2.0	µg/L
Chlorobenzene	ND	2.0	µg/L
Chloroethane	ND	5.0	µg/L
Chloroform	ND	2.0	µg/L
Chlormethane	ND	5.0	µg/L
Dibromochloromethane	ND	2.0	µg/L
1,2-Dichlorobenzene	ND	2.0	µg/L
1,3-Dichlorobenzene	ND	2.0	µg/L
1,4-Dichlorobenzene	ND	2.0	µg/L
1,1-Dichloroethane	ND	2.0	µg/L
1,2-Dichloroethane	ND	2.0	µg/L
1,1-Dichloroethene	ND	1.0	µg/L
cis-1,2-Dichloroethene	ND	2.0	µg/L
trans-1,2-Dichloroethene	ND	2.0	µg/L
1,2-Dichloropropane	ND	2.0	µg/L
cis-1,3-Dichloropropene	ND	1.0	µg/L
trans-1,3-Dichloropropene	ND	1.0	µg/L
Ethylbenzene	ND	2.0	µg/L
Methylene chloride	ND	5.0	µg/L
1,1,2,2-Tetrachloroethane	ND	2.0	µg/L
Tetrachloroethene	ND	2.0	µg/L

Qualifiers: ND - Not Detected at the Reporting Limit

J - Analyte detected below quantitation limits

RL - Reporting Limit; defined as the lowest concentration the laboratory can accurately quantitate.

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

NA - Not applicable where J values or ND results occur

B - Analyte detected in the associated Method Blank

AMRO Environmental Laboratories Corp.

Date: 07-May-08

CLIENT: Leggette, Brashears & Graham, Inc.
Work Order: 0805001
Project: FYN Paint

QC SUMMARY REPORT
Method Blank

Toluene	ND	2.0	µg/L	
1,1,1-Trichloroethane	ND	2.0	µg/L	
1,1,2-Trichloroethane	ND	2.0	µg/L	
Trichloroethene	ND	2.0	µg/L	
Trichlorofluoromethane	ND	2.0	µg/L	
Vinyl chloride	ND	2.0	µg/L	
Acetone	ND	10	µg/L	
2-Butanone	ND	10	µg/L	
Carbon disulfide	ND	2.0	µg/L	
1,2-Dibromoethane	ND	1.0	µg/L	
2-Hexanone	ND	10	µg/L	
4-Methyl-2-pentanone	ND	10	µg/L	
Methyl tert-butyl ether	ND	2.0	µg/L	
Styrene	ND	2.0	µg/L	
Vinyl acetate	ND	10	µg/L	
m,p-Xylene	ND	2.0	µg/L	
o-Xylene	ND	2.0	µg/L	
Surr: Dibromofluoromethane	27.38	2.0	µg/L	25
Surr: 1,2-Dichloroethane-d4	33.12	2.0	µg/L	25
Surr: Toluene-d8	23.37	2.0	µg/L	25
Surr: 4-Bromofluorobenzene	25.56	2.0	µg/L	25

S

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
RL - Reporting Limit, defined as the lowest concentration the laboratory can accurately quantitate.

S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
NA - Not applicable where J values or ND results occur

B - Analyte detected in the associated Method Blank

AMRO Environmental Laboratories Corp.

Date: 07-May-08

CLIENT: Leggette, Brashears & Graham, Inc.
Work Order: 0805001
Project: FYN Paint

QC SUMMARY REPORT
 Laboratory Control Spike - Full List

Analyte	QC Sample		QC Spike		Original Sample		LowLimit	HighLimit	Original Sample or MS Result	%RPD	RPDLimit	Qu
	Result	RL	Units	Amount	Result	%REC						
Benzene	20.22	2.0	µg/L	20	0	101	81	118	0	0	0	0
Bromodichloromethane	18.4	2.0	µg/L	20	0	92	77	131	0	0	0	0
Bromoform	18.16	2.0	µg/L	20	0	90.8	55	126	0	0	0	0
Bromomethane	21.43	5.0	µg/L	20	0	107	51	137	0	0	0	0
Carbon tetrachloride	18.73	2.0	µg/L	20	0	93.6	76	129	0	0	0	0
Chlorobenzene	20.4	2.0	µg/L	20	0	102	84	113	0	0	0	0
Chloroethane	21.14	5.0	µg/L	20	0	106	54	142	0	0	0	0
Chloroform	19.02	2.0	µg/L	20	0	95.1	82	123	0	0	0	0
Chloromethane	21.77	5.0	µg/L	20	0	109	37	150	0	0	0	0
Dibromochloromethane	20.01	2.0	µg/L	20	0	100	63	126	0	0	0	0
1,2-Dichlorobenzene	21.58	2.0	µg/L	20	0	108	81	117	0	0	0	0
1,3-Dichlorobenzene	20.71	2.0	µg/L	20	0	104	84	115	0	0	0	0
1,4-Dichlorobenzene	20.07	2.0	µg/L	20	0	100	79	117	0	0	0	0
1,1-Dichloroethane	18.31	2.0	µg/L	20	0	91.6	78	124	0	0	0	0
1,2-Dichloroethane	18.66	2.0	µg/L	20	0	93.3	76	127	0	0	0	0
1,1-Dichloroethene	19.63	1.0	µg/L	20	0	98.2	68	146	0	0	0	0
cis-1,2-Dichloroethene	18.64	2.0	µg/L	20	0	93.2	78	121	0	0	0	0
trans-1,2-Dichloroethene	18.98	2.0	µg/L	20	0	94.9	81	126	0	0	0	0
1,2-Dichloropropane	19.86	2.0	µg/L	20	0	99.3	79	120	0	0	0	0
cis-1,3-Dichloropropene	19.12	1.0	µg/L	20	0	95.6	76	120	0	0	0	0
trans-1,3-Dichloropropene	17.52	1.0	µg/L	20	0	87.6	66	128	0	0	0	0
Ethylbenzene	20.53	2.0	µg/L	20	0	103	83	118	0	0	0	0
Methylene chloride	18.27	5.0	µg/L	20	0	91.4	67	138	0	0	0	0
1,1,2,2-Tetrachloroethane	21.47	2.0	µg/L	20	0	107	62	134	0	0	0	0
Tetrachloroethylene	21.25	2.0	µg/L	20	0	106	81	124	0	0	0	0

Qualifiers:

ND

- Not Detected at the Reporting Limit

J

- Analyte detected below quantitation limits

R

- RPD outside accepted recovery limits

S

- Spike Recovery outside accepted recovery limits

B

- Analyte detected in the associated Method Blank

NA

- Not applicable where J values or ND results occur

AMRO Environmental Laboratories Corp.

Date: 07-May-08

QC SUMMARY REPORT

Laboratory Control Spike - Full List

QC SUMMARY REPORT									
Laboratory Control Spike - Full List									
CLIENT:	Leggette, Brashears & Graham, Inc.								
Work Order:	0805001								
Project:	FYN Paint								
Toluene	19.98	2.0	µg/L	20	0	99.9	83	119	0
1,1,1-Trichloroethane	19.12	2.0	µg/L	20	0	95.6	81	127	0
1,1,2-Trichloroethane	19.64	2.0	µg/L	20	0	98.2	74	123	0
Trichloroethene	19.81	2.0	µg/L	20	0	99	81	119	0
Trichlorofluoromethane	19.77	2.0	µg/L	20	0	98.8	62	141	0
Vinyl chloride	24.56	2.0	µg/L	20	0	123	48	150	0
Acetone	20.05	10	µg/L	20	0	100	9	150	0
2-Butanone	19.35	10	µg/L	20	0	96.8	41	150	0
Carbon disulfide	20.39	2.0	µg/L	20	0	102	52	131	0
1,1,2-Dibromoethane	20.86	1.0	µg/L	20	0	104	72	128	0
2-Hexanone	18.82	10	µg/L	20	0	94.1	31	148	0
4-Methyl-2-pentanone	18.42	10	µg/L	20	0	92.1	51	141	0
Methyl tert-butyl ether	19.21	2.0	µg/L	20	0	96	63	139	0
Styrene	20.08	2.0	µg/L	20	0	100	81	118	0
Vinyl acetate	30.22	10	µg/L	20	0	151	34	150	0
m,p-Xylene	43.53	2.0	µg/L	40	0	109	85	116	0
o-Xylene	22.34	2.0	µg/L	20	0	112	84	115	0
Surr: Dibromofluoromethane	23.7	2.0	µg/L	25	0	94.8	85	116	0
Surr: 1,2-Dichloroethane-d4	22.32	2.0	µg/L	25	0	89.3	77	127	0
Surr: Toluene-d8	23.72	2.0	µg/L	25	0	94.9	86	114	0
Surr: 4-Bromofluorobenzene	24.28	2.0	µg/L	25	0	97.1	117	0	0

Qualifiers: ND - Not Detected at the Reporting Limit

- Analyte detected below quantitation limits

RL - Reporting Limit; defined as the lowest concentration the laboratory can accurately quantitate.
J - Analyte detected below quantitation limits
R - RFD outside accepted recovery limits

S - Spike Recovery outside accepted recovery limits

B = BPD outside accented recovery limits

NA - Not applicable where J values or ND results occur

B - Analysed in the associated Method Blank

AMRO Environmental Laboratories Corp.

Date: 07-May-08

CLIENT: Leggette, Brashears & Graham, Inc.
Work Order: 0805001
Project: FYN Paint

QC SUMMARY REPORT
 Laboratory Control Spike - Full List

Analyte	QC Sample		QC Spike		Original Sample		%REC	LowLimit	HighLimit	Original Sample or MS Result	%RPD	RPDLimit	Qu
	Result	RL	Units	Amount	Result	Units							
Benzene	16.57	2.0	µg/L	20	0	82.8	81	118	0				
Bromodichloromethane	16.04	2.0	µg/L	20	0	80.2	77	131	0				
Bromoform	15.47	2.0	µg/L	20	0	77.4	55	126	0				
Bromomethane	13.73	5.0	µg/L	20	0	68.6	51	137	0				
Carbon tetrachloride	18.88	2.0	µg/L	20	0	94.4	76	129	0				
Chlorobenzene	17.87	2.0	µg/L	20	0	89.4	84	113	0				
Chloroethane	13.41	5.0	µg/L	20	0	67	54	142	0				
Chloroform	17.9	2.0	µg/L	20	0	89.5	82	123	0				
Chlormethane	16.2	5.0	µg/L	20	0	81	37	150	0				
Dibromochloromethane	17.86	2.0	µg/L	20	0	89.3	63	126	0				
1,2-Dichlorobenzene	18.94	2.0	µg/L	20	0	94.7	81	117	0				
1,3-Dichlorobenzene	18.22	2.0	µg/L	20	0	91.1	84	115	0				
1,4-Dichlorobenzene	19.03	2.0	µg/L	20	0	95.2	79	117	0				
1,1-Dichloroethane	16.05	2.0	µg/L	20	0	80.2	78	124	0				
1,2-Dichloroethane	25.38	2.0	µg/L	20	0	127	76	127	0				
1,1-Dichloroethene	16.24	1.0	µg/L	20	0	81.2	68	146	0				
cis-1,2-Dichloroethene	15.66	2.0	µg/L	20	0	78.3	78	121	0				
trans-1,2-Dichloroethene	15.66	2.0	µg/L	20	0	78.3	81	126	0				
1,2-Dichloropropane	15.44	2.0	µg/L	20	0	77.2	79	120	0				
cis-1,3-Dichloropropene	15.94	1.0	µg/L	20	0	79.7	76	120	0				
trans-1,3-Dichloropropene	18.45	1.0	µg/L	20	0	92.2	66	128	0				
Ethylbenzene	17.1	2.0	µg/L	20	0	85.5	83	118	0				
Methylene chloride	15.46	5.0	µg/L	20	0	77.3	67	138	0				
1,1,2,2-Tetrachloroethane	20.41	2.0	µg/L	20	0	102	62	134	0				
Tetrachloroethene	18.28	2.0	µg/L	20	0	91.4	81	124	0				

Qualifiers: ND - Not Detected at the Reporting Limit

J - Analyte detected below quantitation limits

R - RPD outside accepted recovery limits

RL - Reporting Limit; defined as the lowest concentration the laboratory can accurately quantitate.

S - Spike Recovery outside accepted recovery limits

B - Analyte detected in the associated Method Blank

NA - Not applicable where J values or ND results occur

AMRO Environmental Laboratories Corp.

Date: 07-May-08

QC SUMMARY REPORT
Laboratory Control Spike - Full List

CLIENT: Leggette, Brashears & Graham, Inc.
Work Order: 0805001
Project: FYN Paint

		16.83	2.0	µg/L	20	0	84.2	83	119	0
Toluene		19.72	2.0	µg/L	20	0	98.6	81	127	0
1,1,1-Trichloroethane		18.57	2.0	µg/L	20	0	92.8	74	123	0
1,1,2-Trichloroethane		16.88	2.0	µg/L	20	0	84.4	81	119	0
Trichloroethene		21.72	2.0	µg/L	20	0	109	62	141	0
Trichlorofluoromethane		16.62	2.0	µg/L	20	0	83.1	48	150	0
Vinyl chloride		14.35	10	µg/L	20	0	71.8	9	150	0
Acetone		18.63	10	µg/L	20	0	93.2	41	150	0
2-Butanone		14.73	2.0	µg/L	20	0	73.6	52	131	0
Carbon disulfide		19.95	1.0	µg/L	20	0	99.8	72	128	0
1,2-Dibromoethane		18.47	10	µg/L	20	0	92.4	31	148	0
2-Hexanone		21.21	10	µg/L	20	0	106	51	141	0
4-Methyl-2-pentanone		18.61	2.0	µg/L	20	0	93	63	139	0
Methyl tert-butyl ether		18.83	2.0	µg/L	20	0	94.2	81	118	0
Styrene		18.22	10	µg/L	20	0	91.1	34	150	0
Vinyl acetate		35.46	2.0	µg/L	40	0	88.6	85	116	0
m,p-Xylene		17.5	2.0	µg/L	20	0	87.5	84	115	0
o-Xylene		27.19	2.0	µg/L	25	0	109	85	116	0
Surr: Dibromofluoromethane		34.31	2.0	µg/L	25	0	137	77	127	0
Surr: 1,2-Dichloroethane-d4		24.2	2.0	µg/L	25	0	96.8	86	114	0
Surr: Toluene-d8		26.37	2.0	µg/L	25	0	105	79	117	0
Surr: 4-Bromofluorobenzene										

S

Qualifiers: ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
RL - Reporting Limit; defined as the lowest concentration the laboratory can accurately quantitate.

S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
NA - Not applicable where J values or ND results occur

B - Analyte detected in the associated Method Blank

NA - Not applicable where J values or ND results occur



DEPARTMENT OF
ENVIRONMENTAL
PROTECTION

59-17 Junction Boulevard
Flushing, New York 11373

Emily Lloyd
Commissioner

Douglas S. Greeley, P.E.
Deputy Commissioner

Bureau of Wastewater
Treatment

Tel. (718) 595-6389
Fax. (718) 595-6950
dgreeley@dep.nyc.gov

May 8, 2008

Fyn Paint and Lacquer Co., Inc.
229 Kent Avenue
Brooklyn, NY 11211

Attn: William K. Beckman, P.E.

Re: Groundwater Discharge
Fyn Paint and Lacquer Co
230 Kent Avenue
File Case # C-4136

Dear Mr. Beckman:

This Letter of Approval is a renewal to the Letter of Approval issued on March 15, 2007.

This is in response to your March 28th and May 7, 2008 submissions, requesting for the permission to discharge up to **7,200 gallons per day (gpd)** of groundwater generated during dewatering operations in response to a Voluntary Cleanup Program (VCP) under the supervision of the New York State Department of Environmental Conservation (NYSDEC) for Site ID No. V00380-2, Index No. W2-0873-00-10. The groundwater discharge will be treated through a system consisting of an air-stripper and a two hundred lbs. liquid phase carbon unit, per provided schematic and information, before discharging into the on-site connection that leads to the combined sewer located at North First Street between River Street and Kent Avenue in Brooklyn, NY.

Based upon the information, schematic and analytical data submitted, you are hereby conditionally authorized to discharge up to 7,200 gpd of groundwater, per provided schematic and information, as specified in your submissions, **for a period of 273 days**, to the on-site connection leading to the combined sewer at the above mentioned location. **This Letter of Approval shall expire at midnight on February 5, 2009.**

You must contact the Division of Air, Noise, Permitting and Policy regarding the air-stripper. You are also required to follow manufacturer specifications for the operation and maintenance of the selected equipments.

This conditional approval, however, is subject to your obtaining a groundwater discharge Approval, specifying allowable flow rates, from the Division of Permitting and Connections, Bureau of Water and Sewer Operations, if discharges exceed 10,000 gpd. **This Letter of Approval is contingent upon permittee's compliance with any other Federal, State or Local laws applicable to the permitted activity.**



Payment shall be made to the Bureau of Customer Service for groundwater discharge into the New York City Wastewater System in accordance with the Water and Wastewater Rate Schedule established by the New York City Water Board.

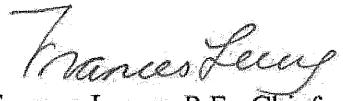
You must notify this section in writing prior to the commencement of discharge. In addition, you are required to hold the groundwater to the maximum extent practicable during heavy wet weather events. Refer to the File Case C-4136 in any correspondence to this office.

The permittee must collect samples of the groundwater after the pre-treatment system on a quarterly basis. The samples must be analyzed for the parameters listed in the attached list by a New York State Department of Health certified laboratory. The results must be submitted to this office within 21 days after the sampling date. If any of the sampling results exceed DEP limit, the discharge must be ceased and the Bureau of Wastewater Treatment must be notified immediately by phone and Fax (718) 595-4771.

This Letter of Approval is an order of the Commissioner of the Department of Environmental Protection. Please be advised that failure to comply with this Letter of Approval may result in the issuance of Notices of Violation (returnable to the New York City Environmental Control Board). Notices of Violation carry penalties of up to \$10,000 a day, per violation and/or revocation of the Letter of Approval.

If you have any questions concerning this matter, please telephone Mr. Alex Castro, Assistant Chemical Engineer, at (718) 595-4715.

Sincerely,



Frances Leung
Frances Leung, P.E., Chief,
IPP Inspection & Permit Section

Enc: Sampling requirements

Sampling requirements for C-4136

Parameter ¹	Daily Limit	Units	Sample Type	Monthly Limit
Non-polar material ²	50	mg/l	Instantaneous	---
pH	5-11	SU's	Instantaneous	---
Temperature	< 150	Degree F	Instantaneous	---
Flash Point	> 140	Degree F	Instantaneous	---
Cadmium	2 0.69	mg/l mg/l	Instantaneous Composite	---
Chromium (VI)	5	mg/l	Instantaneous	---
Copper	5	mg/l	Instantaneous	---
Lead	2	mg/l	Instantaneous	---
Mercury	0.05	mg/l	Instantaneous	---
Nickel	3	mg/l	Instantaneous	---
Zinc	5	mg/l	Instantaneous	---
Benzene	134	ppb	Instantaneous	57
Carbontetrachloride	---	---	Composite	---
Chloroform	---	---	Composite	---
1,4 Dichlorobenzene	---	---	Composite	---
Ethylbenzene	380	ppb	Instantaneous	142
MTBE (Methyl-Tert-Butyl-Ether)	50	ppb	Instantaneous	---
Naphthalene	47	ppb	Composite	19
Phenol	---	---	Composite	---
Tetrachloroethylene (Perc)	20	ppb	Instantaneous	---
Toluene	74	ppb	Instantaneous	28
1,2,4 Trichlorobenzene	---	---	Composite	---
1,1,1 Trichloroethane	---	---	Composite	---
Xylenes (Total)	74	ppb	Instantaneous	28
PCB's (Total) ³	1	ppb	Composite	---
Total Suspended Solids (TSS)	350 ⁴	mg/l	Instantaneous	---
CBOD ⁵	---	---	Composite	---
Chloride ⁵	---	---	Instantaneous	---
Total Nitrogen ⁵	---	---	Composite	---
Total Solids ⁵	---	---	Instantaneous	---
Other				

1 All handling and preservation of collected samples and laboratory analyses of samples shall be performed in accordance with 40 C.F.R. pt. 136. If 40 C.F.R. pt. 136 does not cover the pollutant in question, the handling, preservation, and analysis must be performed in accordance with the latest edition of "Standard Methods for the Examination of Water and Wastewater." All analyses shall be performed using a detection level less than the lowest applicable regulatory discharge limit. If a parameter does not have a limit, then the detection level is

defined as the least of the Practical Quantitation Limits identified in NYSDEC's Analytical Detectability and Quantitation Guidelines for Selected Environmental Parameters, December 1988

- 2 Analysis for *non-polar materials* must be done by EPA method 1664 Rev. A. Non-Polar Material shall mean that portion of the oil and grease that is not eliminated from a solution containing N-Hexane, or any other extraction solvent the EPA shall prescribe, by silica gel absorption.
- 3 Analysis for PCB's is required if *both* conditions listed below are met:
 - 1) if proposed discharge \geq 10,000 gpd;
 - 2) if duration of a discharge > 10 days.

Analysis for PCB's must be done by EPA method 608 with MDL=<65 ppt. PCB's (total) is the sum of PCB-1242 (Arochlor 1242), PCB-1254 (Arochlor 1254), PCB-1221 (Arochlor 1221), PCB-1232 (Arochlor 1232), PCB-1248 (Arochlor 1248), PCB-1260 (Arochlor 1260) and PCB-1016 (Arochlor 1016).
- 4 For discharge \geq 10,000 gpd, the TSS limit is 350 mg/l. For discharge < 10,000gpd, the limit is determined on a case by case basis.
- 5 Analysis for Carbonaceous Biochemical Oxygen Demand (CBOD), Chloride, Total Solids and Total Nitrogen are required if proposed discharge \geq 10,000 gpd.