



January 09, 2008

Mr. Bernard Franklin  
New York State Department of Environmental Conservation  
Division of Environmental Remediation  
Remedial Bureau C  
625 Broadway  
Albany, New York 12233-7014

Subject:  
Ogdensburg (King Street) Non-Owned Former MGP Site  
Former Huot Property – Interim Remedial Measure Surface Cover

Dear Mr. Franklin:

This letter presents a description of the Interim Remedial Measures (IRM) focused surface cover installation that was conducted in November 2007 at the former Huot property located adjacent to the Ogdensburg (King Street) Non-Owned Former Manufactured Gas Plant (MGP) Site located in Ogdensburg, New York. Please note that the installation of the IRM surface cover was conducted in conjunction with the demolition of the house located on the former Huot property (207/209 Lake Street).

The IRM surface cover was installed in general conformance with the NYSDEC-approved revised Work Plan for Focused Surface Cover IRM (Work Plan), dated April 12, 2007. The IRM surface cover installation was completed on November 14, November 15 and November 26, 2007 by National Grid's Contractor, Op-Tech Environmental Services, Inc. (Op-Tech). The IRM surface cover consisted of two layers of nonwoven geotextile fabric (Geotex 801) over the IRM surface cover limits, as depicted on Figure 1.

Following placement of the geotextile fabric, approximately 6 inches of select fill material were placed on top of the fabric. The select fill material extended beyond the limits of the fabric by approximately 3 feet on the north and east sides. The first 3 inches of select fill material placed on the geotextile fabric was observed to contain a higher percentage of finely graded material (i.e., less than the gradation criteria presented in the Work Plan). Based on this visual observation, Op-Tech placed a second 3-inch layer of select fill that achieved the select fill material gradation criteria presented in the Work Plan. The select fill material also extended beyond the limits of the fabric by approximately 3 feet on the north and east sides. Photographic documentation of the IRM surface cover installation is provided in Attachment A.

The select fill material was imported from Barrett Paving Materials, Inc. Samples of the select fill were collected prior to mobilization and analyzed for volatile organic compounds, semi-volatile organic compounds, and inorganics. The analytical results were compared to the unrestricted use of soil cleanup objectives for the protection of human health listed in Table 375-3.8(a) of Part 375 of Title 6 of the New York Codes, Rules, and Regulations to document that the select fill material was suitable for the IRM surface cover based on chemical composition. Attachment B presents the analytical results for the select fill material samples.

National Grid's onsite observer, ARCADIS, performed air monitoring during the installation of the IRM surface cover in accordance with the NYSDEC approved CAMP. The CAMP was submitted on November 6, 2007 to the NYSDEC and the New York State Department of Health (NYSDOH). The NYSDEC provided conditional approval on the CAMP in an email to National Grid on November 9, 2007. ARCADIS conducted continuous site perimeter air monitoring using a photoionization detector for volatile organic compounds and a particulate monitor for particulate matter less than 10 microns (PM<sub>10</sub>). Monitoring was continuously performed by monitoring 15-minute averages of each.

ARCADIS' air monitoring logs for November 14, 2007 are presented in Attachment C. On November 15 and November 26, 2007 there was ongoing precipitation during the completion of the IRM surface cover and therefore air monitoring was not required or conducted.

Should you have any questions regarding the above, please do not hesitate to contact me.

Sincerely,

Handwritten signature of Steven P. Stucker in blue ink, with the initials 'mmH' written at the end.

Steven P. Stucker  
Senior Environmental Engineer

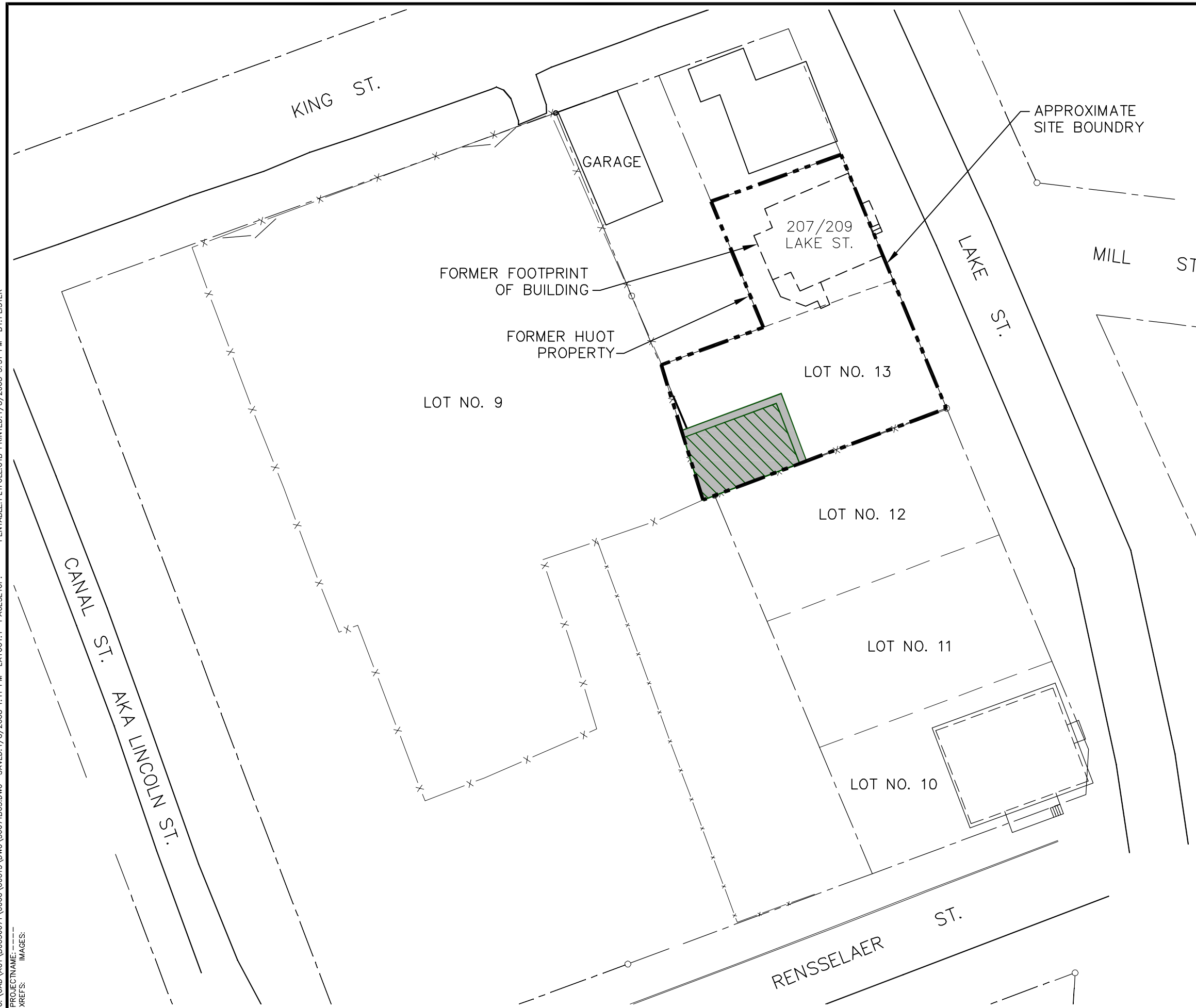
cc: Margaret Carrillo-Sheridan, P.E., ARCADIS  
Scott Powlin, ARCADIS  
Maureen Hudson, ARCADIS  
Ian Ushe, NYS Department of Health

Enclosures:

Figure 1 – Limits of IRM Surface Cover  
Attachment A – Photographic Documentation of IRM Surface Cover Installation  
Attachment B – Select Fill Material Analytical Results  
Attachment C – Air Monitoring Logs

Figure 1

SYR-85-RGB GMS PGL LAYER: ON=\*, OFF=REF  
G:\CAD\ACT\B0036671\0000\00013\DWG\36671B05.DWG SAVED:1/8/2008 1:11 PM LAYOUT:1 PAGES:1 PENTABLE:PLTFULLCTB PRINTED:1/8/2008 3:31 PM BY:PULSTER  
PROJECTNAME: IMAGES:

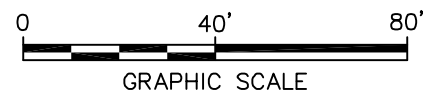


**LEGEND:**

- IRM GEOTEXTILE SURFACE COVER
- IRM SELECT FILL SURFACE COVER
- APPROXIMATE SITE BOUNDARY
- APPROXIMATE ROAD RIGHT-OF WAY
- CHAINLINK FENCE

**NOTES:**

1. BASE MAP FROM SURVEY BY WCT SURVEYORS, P.C., ON 11/21/2003, 12/22/2003 AND 4/7/2004. BASE MAP UPDATED BY C.T. MALE SURVEYORS ON SEPTEMBER 7, 2006. PROPERTY BOUNDARIES BASED ON TAX MAP.
2. ALL LOCATIONS ARE APPROXIMATE.
3. LIMITS OF SURFACE COVER ARE BASED ON FIELD MEASUREMENTS CONDUCTED DURING THE INSTALLATION OF THE IRM SURFACE COVER.
4. THE FORMER HUOT BUILDING WAS DEMOLISHED IN NOVEMBER 2007.



FORMER HUOT BUILDING – 207/209 LAKE STREET  
OGDENSBURG, NEW YORK  
FOCUSED SURFACE COVER IRM REPORT

**APPROXIMATE LIMITS OF  
IRM SURFACE COVER**



**Attachment A**

Photograph Log



# ***IRM Surface Cover***



Placement of Geotextile Material



Placement of Select Fill Material

# ***IRM Surface Cover***



Completion of First Layer of Select Fill Material



Final Condition of IRM Surface Cover

**Attachment B**

Select Fill Analytical Results



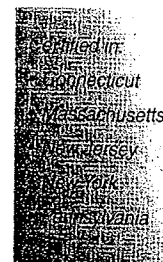


**Environmental**  
LABORATORY SERVICES

RECEIVED  
NOV 08 2007

BY: .....

7280 Caswell Street, Hancock Air Park, North Syracuse, NY 13212  
(315) 458-8033, FAX (315) 458-0526, (800) 842-4667



## Laboratory Analysis Report

OP-TECH  
14 Old River Road  
P.O. Box 5182  
Massena, NY 13662  
ATTN: Mr. Guy Griffin

PROJECT #: 225950  
RECEIVED: 10/29/2007 @ 08:00

Site Address:  
BARRETT'S -NORWOOD PIT  
2" MINUS AGG, STOCKPILE

CLIENT JOB NUMBER: MNM-01588

TEST PERFORMED	RESULTS	UNITS	DATE/TIME PERFORMED	METHOD NUMBER	PERFORMED BY
SAMPLE #: 462820	CLIENT SAMPLE ID:	OP-4736 2" MINUS STOCKPILE	DATE/TIME SAMPLED: 10/26/07 @ 13:00		
MERCURY	<0.04	MG/KG DRY WT.	11/06/07	EPA 7471A	CRI
Mercury Prep 7471A			11/05/07	EPA 7471A	BDR
RCRA METALS (8)					
arsenic	<1.1	MG/KG DRY WT.	11/02/07	EPA 6010	CRI
barium	11.1	MG/KG DRY WT.	11/08/07	EPA 6010	CRI
cadmium	<0.21	MG/KG DRY WT.	11/02/07	EPA 6010	CRI
chromium	3.5	MG/KG DRY WT.	11/02/07	EPA 6010	CRI
lead	1.5	MG/KG DRY WT.	11/02/07	EPA 6010	CRI
selenium	<1.1	MG/KG DRY WT.	11/05/07	EPA 6010	CRI
silver	<0.21	MG/KG DRY WT.	11/02/07	EPA 6010	CRI
Metals Digestion			11/01/07	EPA 3050B	BDR
Semi-Volatile - 8270 B/N STARS LIST (DEC-RSCO)					
acenaphthene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
acenaphthylene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
anthracene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
benzo(a)anthracene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
benzo(a)pyrene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
benzo(b)fluoranthene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
benzo(g,h,i)perylene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
benzo(k)fluoranthene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
chrysene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
dibenz(a,h)anthracene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
fluoranthene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
fluorene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
indeno(1,2,3-cd)pyrene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
naphthalene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
phenanthrene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
pyrene	<0.0520	MG/KG DRY WT.	11/01/07	EPA 8270C	ASI
Surrogate (2-fluorophenol): 57% recovery, (phenol-d6): 102% recovery, (nitrobenzene-d5): 74% recovery, (2-fluorobiphenyl): 81% recovery, (2,4,6-tribromophenol): 97% recovery, (terphenyl-d14): 119% recovery, Surrogate recovery acceptance limits are 50-130%.					
Solid Ultrasonic Extraction			10/31/07	EPA 3550B	KAL

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Semi-Volatile - HERBICIDES					
2,4,5-t	<0.01	MG/KG DRY WT.	11/07/07	EPA 8151A	KDI
2,4,5-tp (silvex)	<0.01	MG/KG DRY WT.	11/07/07	EPA 8151A	KDI
2,4-d	<0.01	MG/KG DRY WT.	11/07/07	EPA 8151A	KDI
dalapon	<0.01	MG/KG DRY WT.	11/07/07	EPA 8151A	KDI
dicamba	<0.01	MG/KG DRY WT.	11/07/07	EPA 8151A	KDI
dinoseb	<0.01	MG/KG DRY WT.	11/07/07	EPA 8151A	KDI
pentachlorophenol	<0.01	MG/KG DRY WT.	11/07/07	EPA 8151A	KDI
picloram	<0.01	MG/KG DRY WT.	11/07/07	EPA 8151A	KDI
Surrogate (2,4-dichlorophenylacetic acid): 106% recovery, Surrogate recovery acceptance limits are 50-130%.					
Solid Soxhlet Extraction			11/05/07	EPA 3540C	KAL
Semi-Volatile - PCB'S					
aroclor 1016	<0.03	MG/KG DRY WT.	11/01/07	EPA 8082	KDI
aroclor 1221	<0.03	MG/KG DRY WT.	11/01/07	EPA 8082	KDI
aroclor 1232	<0.03	MG/KG DRY WT.	11/01/07	EPA 8082	KDI
aroclor 1242	<0.03	MG/KG DRY WT.	11/01/07	EPA 8082	KDI
aroclor 1248	<0.03	MG/KG DRY WT.	11/01/07	EPA 8082	KDI
aroclor 1254	<0.03	MG/KG DRY WT.	11/01/07	EPA 8082	KDI
aroclor 1260	<0.03	MG/KG DRY WT.	11/01/07	EPA 8082	KDI
Surrogate (2,4,5,6-tetrachloro-m-xylene): 130% recovery,(decachlorobiphenyl): 103% recovery, Surrogate recovery acceptance limits are 75-125%.					
Solid Soxhlet Extraction			11/05/07	EPA 3540C	KAL
Semi-Volatile - PESTICIDES					
4,4'-ddd	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
4,4'-dde	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
4,4'-ddt	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
aldrin	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
alpha-bhc	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
beta-bhc	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
chlordane - technical	<0.03	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
delta-bhc	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
dieldrin	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
endosulfan I	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
endosulfan II	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
endosulfan sulfate	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
endrin	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
endrin aldehyde	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
gamma-bhc (lindane)	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
heptachlor	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
heptachlor epoxide	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
methoxychlor	<0.003	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI
toxaphene	<0.03	MG/KG DRY WT.	11/07/07	EPA 8081A	KDI



**Environmental**  
LABORATORY SERVICES

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Semi-Volatile - PESTICIDES					
Surrogate (2,4,5,6-tetrachloro-m-xylene): 76% recovery,(decachlorobiphenyl): 53% recovery, Surrogate recovery acceptance limits are 75-125%.					
Solid Ultrasonic Extraction			10/31/07	EPA 3550B	KAL
SOLIDS, TOTAL	94	PERCENT	10/30/07	SM18 2540B	LBA
Volatile - 8260 STARS LIST w/TBA					
1,2,4-trimethylbenzene	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
1,3,5-trimethylbenzene	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
4-isopropyltoluene	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
benzene	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
ethylbenzene	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
isopropylbenzene	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
mtbe	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
naphthalene	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
n-butylbenzene	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
n-propylbenzene	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
sec-butylbenzene	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
t-butyl alcohol	<0.500	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
tert-butylbenzene	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
toluene	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
xylene, m+p	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
xylene, o	<0.100	MG/KG DRY WT.	11/01/07	EPA 8260B	MNE
Surrogate (dibromofluoromethane): 104 % recovery,(toluene-d8): 87 % recovery,(bromofluorobenzene): 81 % recovery,(1,2-dichlorobenzene-d4): 124 % recovery, Surrogate recovery acceptance limits are 85-115%,(Dibromofluoromethane,80-120%)					
Soil Extraction for Volatiles			10/30/07	EPA 5035	MNE



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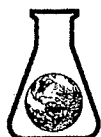
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Sample Receipt Temperature: 4 Degrees C

  
David R. Hill  
Laboratory Director

11/08/2007  
Print Date

All tests performed under NYS ELAP Laboratory Certification # 11375 unless otherwise stated.  
Report relates only to the samples as received by the laboratory and shall not be reproduced  
except in full, without written approval from Environmental Laboratory Services.



**Environmental**  
LABORATORY SERVICES



**6392 Deere Road  
Syracuse, New York 13206**

# CHAIN OF CUSTODY RECORD

JOB NO. MNM-01588 W.I.P. NO. \_\_\_\_\_  
SITE LOCATION BADETTS - NORWOOD PT, 2<sup>nd</sup> MINUS WSS, STACKS CONTACT: GUY GRIFFIN  
SPECIAL REPORTING REQUIREMENTS (other than mail): \_\_\_\_\_  
PHONE NO.: 764-1917 FAX NO.: 764-9453

Turn Around Time		Special Detection Limits		Special QA/QC Level		Analysis Requested		Special Instructions			
24-HOUR	48-HOUR	Yes	No	Yes	No	Yes	No				
NORMAL	OTHER	(Specify)	(Specify)	(Specify)	(Specify)						
Turn Around Time <input type="checkbox"/> 24-HOUR <input type="checkbox"/> 48-HOUR <input checked="" type="checkbox"/> NORMAL <input type="checkbox"/> OTHER		Special Detection Limits Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (Specify)		Special QA/QC Level Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (Specify)		Analysis Requested EPA 8021 STARS <input type="checkbox"/> EPA 8270 STARS <input type="checkbox"/> EPA 8270 B/N <input checked="" type="checkbox"/> with 10 TICS <input type="checkbox"/> EPA 8015 DRO <input type="checkbox"/> GRO <input type="checkbox"/> COMBO <input type="checkbox"/> EPA 524.2 <input type="checkbox"/> with MTBE/TBA <input type="checkbox"/> +10 <input type="checkbox"/> EPA 625 <input type="checkbox"/> EPA 8270 <input type="checkbox"/> (+25) <input type="checkbox"/> EPA 8250 <input type="checkbox"/> EPA 624 <input type="checkbox"/> EPA 8240 <input type="checkbox"/> (+15) <input type="checkbox"/> EPA 8260 <input type="checkbox"/> EPA 610 <input type="checkbox"/> EPA 8310 <input type="checkbox"/> EPA 608 <input checked="" type="checkbox"/> EPA 8080 <input type="checkbox"/> PCB ONLY <input checked="" type="checkbox"/> EPA 8260 <input type="checkbox"/> with MTBE <input type="checkbox"/> TBA <input type="checkbox"/> EPA 601 <input type="checkbox"/> EPA 8010 <input type="checkbox"/> EPA 503.1 <input type="checkbox"/> EPA 502.2 <input type="checkbox"/> EPA 524 <input type="checkbox"/> NYSDOH 310.13 <input type="checkbox"/> NYSDOH 310.34 <input type="checkbox"/> TCLP: LEAD <input type="checkbox"/> TCLP: BENZENE <input type="checkbox"/> TOTAL METALS <input checked="" type="checkbox"/> LIST: <i>Ketia-8</i> TCLP: PEST <input type="checkbox"/> HERB <input type="checkbox"/> PAINT FILTER <input type="checkbox"/> TCLP: METALS <input type="checkbox"/> VOA <input type="checkbox"/> SEMI-VOA <input type="checkbox"/> CORROS <input type="checkbox"/> FLASH <input type="checkbox"/> REACT <input type="checkbox"/> pH <input type="checkbox"/>		Comments <i>GR141292 OR-TECH. US</i> <i>X - PETICUS/H281413</i> <i>X - INDELMICS</i> <i>5.0000</i> <i>10/21/07</i>			
Container Type: <input checked="" type="checkbox"/> V - VOA VIALS <input checked="" type="checkbox"/> G - GLASS <input checked="" type="checkbox"/> P - PLASTIC <input type="checkbox"/> O - OTHER		Type of Sample: <input checked="" type="checkbox"/> G-GRAB <input checked="" type="checkbox"/> C-COMPOSITE <input type="checkbox"/> W-WIPE <input type="checkbox"/> SS-SURFACE SCRAPE <input type="checkbox"/> OT-OTHER (SPECIFY)		Preservative HCl <input type="checkbox"/> Na <sub>2</sub> S <sub>2</sub> O <sub>3</sub> <input type="checkbox"/> HNO <sub>3</sub> <input type="checkbox"/> H <sub>2</sub> SO <sub>4</sub> <input type="checkbox"/> Ice (4°C) <input checked="" type="checkbox"/> Teflon Liner <input type="checkbox"/> Filtered <input type="checkbox"/> Other <input type="checkbox"/>		Matrix NUMBER <input type="checkbox"/> SIZE <input type="checkbox"/> TYPE <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> SOIL <input checked="" type="checkbox"/> AIR <input type="checkbox"/> SLUDGE <input type="checkbox"/> OTHER <input type="checkbox"/>		Date 10/24/07		Sample I.D. OP-4734	
Custody Transfers SAMPLED BY: <i>R24 4734 10/24/07</i> RELINQUISHED BY: RELINQUISHED BY: LABORATORY: <i>ELS</i>		DATE 10/24/07		TIME 1:00 PM		RECEIVED BY: RECEIVED BY: RECEIVED AT LAB BY: ADDRESS:		DATE 10/24/07		TIME 1:00 PM	

## WHITE - LABORATORY

**Canary - JOB FILE**

**Pink - SUPERVISOR**

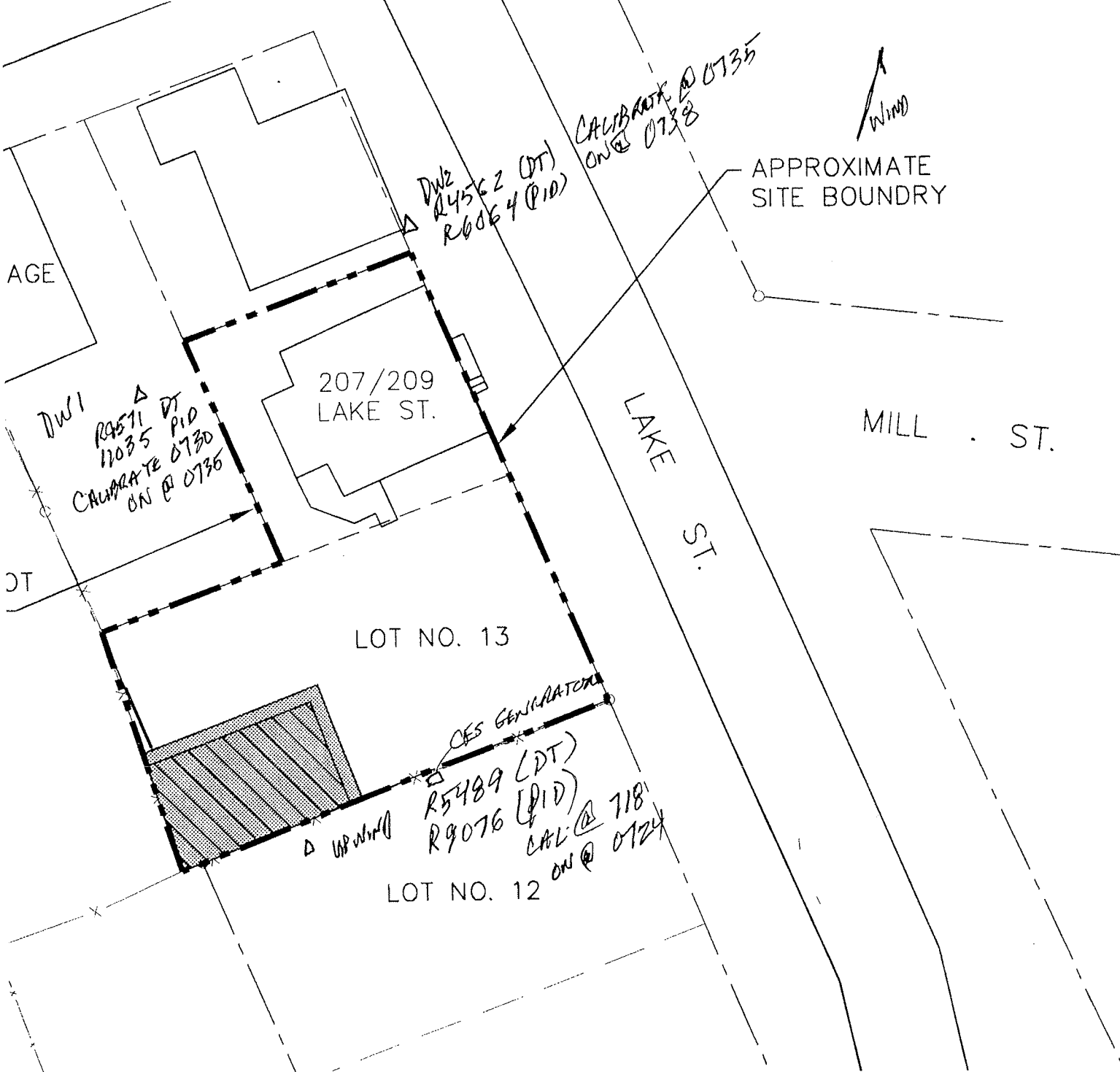
2202.046.9205



**Attachment C**

Air Monitoring Logs

NATIONAL GRID  
B0036671.0000. ~~014~~ 014 207/209 LAKE ST, OGDENSBURG, NY 14.07  
AIR MONITORING STA. LOCATIONS



Community Air Monitoring Log  
Ogdensburg (King Street) Non-Owned Former MGP Site  
Huot Building Demolition  
Ogdensburg, NY

DTE 5489, PID = R9076

Date	Location	Time of Day	Reading (ug/m <sup>3</sup> )	Comments
11/14/07	UPWARD	0800	0.024	LOADING OPS BEGIN PID=0.3
		0815	0.015	0.5 LOAD #12
		0830	0.018	0.5 " " REZERO @ 0835
		0845	0.020	0.7 SIZING DEBRIS
		0900	0.017	0.5 LOAD TRUCK #14
		0915	0.019	0.6 " " " 15
		0930	0.021	0.6 SIZING DEBRIS
		0945	0.023	0.7 LOAD #16
		1000	0.024	0.6 LOAD #17
		1015	0.027	0.7 TRM GEOTEX
		1030	0.025	0.6 SIZING DEBRIS
		1045	0.025	0.5 BOBCAT DEBRIS REMOVAL PART ON PID LOW
		1100	0.024	0.5 " " " " LOAD #19
		1108	NA	BATTERY CHARGE OUT ON EQUIP PID
		1115	0.015	0.0 DEBRIS SIZING & BOBCAT DEBRIS REMOVAL
		1130	0.024	0.0 BASEMENT CLEAN OUT (HAND)
		1145	0.021	0.0 IMPACTOR PLATE & JACKET CLEANED. LOAD #21
		1200	0.024	0.0 NO ACTIVITIES - LUNCH BREAK
		1230	NA	" " " "
		1245	NA	" " " "
		1300	0.036	0.2 LOAD #22 BEGINS @ 1300
		1315	0.038	0.1 " " " "
		1330	0.035	0.1 LOAD #22 & BASEMENT CLEAN (HAND)
		1345	0.035	0.0 " " " "
		1400	0.032	0.1 " " " "
		1415	0.031	0.1 " " " "

DT = R4571, RD = 11035

*[Signature]*

DT = R4562, PID = R6064

MODERATE  
RAIN