

ADDITIONAL REMEDIAL ACTION COMPLETION REPORT:
REGENOX COMPLEX INJECTION
AND
GROUNDWATER AND SOIL TESTING
ON 1/18/06 AND 2/8/06
AT
1101 LINWOOD STREET
BROOKLYN, NEW YORK 11208

SUBMITTED UNDER THE
NEW YORK STATE DEPT. OF ENVIRONMENTAL CONSERVATION
VOLUNTARY CLEANUP PROGRAM
FOR
SITE #V00582
WITH
VOLUNTARY CLEANUP AGREEMENT
INDEX #D2-0001-02-08

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H2M LABS, INC.

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RECAPITULATION

RegenOx complex injection and groundwater and soil testing was performed at 1101 Linwood Street, Brooklyn, New York on 1/18/06 - 1/20/06 and 2/8/06. One (1) groundwater sample was collected from a new permanent down gradient monitoring well, installed on the Linwood Street sidewalk on the southwest side of the building and three (3) soil samples were collected from three new soil sample locations at Essex Street on the northeast side of the building. The groundwater sample included: one sample from the monitoring well, one matrix spike, one matrix spike duplicate, one trip blank and one field blank. The soil samples included: one sample from each boring at locations #1, 2 & 3 (see Site Plan dwg.) as well as one matrix spike and one matrix spike duplicate from location #1 and one trip blank.

The results indicate that there are no detectable levels of BTEX in the groundwater samples, while the soil samples indicate the presence of BTEX.

A total of 3960 pounds of RegenOx complex was injected into the groundwater at 7 new locations (see Site Plan dwg.) using Geo-Probe equipment. This was performed to promote the reduction of groundwater contamination.

MK:RAL:SM

ROBERT A. LO PINTO, P.E.
MAY 4, 2006

01-44

1101 LINWOOD STREET
BROOKLYN, NEW YORK 11208

SITE PLAN DWG.

SAMPLING/INJECTION LOCATION PLAN

ADDITIONAL REMEDIAL ACTION COMPLETION REPORT**TABLE OF CONTENTS**

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GENERAL DISCUSSION

S&S X-Ray Products has entered into a Voluntary Cleanup Agreement (VCA) for the property at 1101 Linwood Street, Brooklyn, New York 11208 with the NYSDEC, which became effective on 9/22/02. In accordance with the November 4, 2005 Additional Remedial Action Work Plan for 1101 Linwood Street, Brooklyn, New York, amended on November 30, 2005 (accepted by NYS DEC on November 30, 2005), soil sampling at three new locations within the prior excavation area was performed on 1/18/06. After the samples had been taken, the three soil borings was extended to 26 feet below grade and additional 26-foot deep borings were placed with about a 7-foot interval from each other in the area of the prior excavation. Approximately 252 gallons of RegenOx oxidizer and activator complexes (OAC) were injected into each of seven (7) borings, a total of 3960 lbs. The quantity of RegenOX used was based on calculations conducted by the manufacturer. Placing the OAC into the borings was designed to help in removing the contamination from the groundwater.

Also, groundwater samples were taken on 2/8/06 from the permanent down gradient monitoring well that was installed on 01/18/06 on the Linwood Street sidewalk on the southwest side of the building.

Soil sampling was performed by representatives from Unitech Services Group, Aquifer Drilling & Testing (ADT) and Shapiro Engineering, P.C. in the presence of Michael MacCabe, P.E., the NYS DEC Senior Environmental Engineer from the Division of Environmental Remediation.

SOIL SAMPLING AND ANALYSIS

On 1/18/06 soil samples were collected utilizing a portable Geo-Probe unit equipped with a Macrocore® soil sampler from three new sample locations placed in the area of the earlier excavations through the sidewalk outside the building (see Sampling/Injection Location Plan). Two of them were made in the area of the larger excavation (Locations #1 & 2). One boring was placed in the area of the smaller excavation (Location #3). One soil sample was collected from each boring just below the bottom of the original excavation, which is below the demarcation line of plastic sheeting approximately 12-foot deep. Two additional samples (a matrix spike sample and a matrix spike duplicate sample) were taken from Location #1. All the soil samples, together with a trip blank sample were delivered to H2M Labs, Inc., which is a NYS DOH approved laboratory for individual BTEX compound analysis, using USEPA Method 8260B. The laboratory analytical results are included at Appendix "C".

REGENOX COMPLEX INJECTION

After the samples had been taken, the three soil borings were extended to 26 feet below grade and an additional four 26-foot deep borings were placed with about a 7-foot interval from each other in the area of the prior excavation. 26-foot long 1-inch diameter drive rods were inserted in turn into each boring, to ensure adequate conditions for RegenOx complexes injection utilizing a portable Geo-Probe unit. The total amount of RegenOx, 3,960 lbs. (including 1,980 lbs. of oxidizer and 1,980 lbs. of activator), was considered to be optimal for the site conditions and one-time OAC application required

by NYS DEC. This total amount was divided into several portions to be completely injected with a time interval of approximately two hours, depending on the soil permeability.

Due to the soil conditions at Location #1, RegenOx complex was rejected from being pumped in. Instead, a new Location #8 was placed nearby. Approximately 252 gallons of RegenOx oxidizer and activator complexes (OAC) were injected into each of the seven borings.

RegenOx was supplied in two separate parts: Part A - oxidizer complex, which is a fine white powder, and Part B - activator complex that comes as a liquid gel. Based on Regeneration calculations, oxidizer was mixed with water to create a 13.5% solution and was kept stirred up to the moment when it was injected into the boring to prevent an excess reaction and flocculation. A half-gallon of water was added into each bucket of the activator and was mixed for at least 5 minutes until a homogenous mixture was formed. Immediately before the injection, the activator complex was added to the solution of the oxidizer. The mixture of the two complexes was stirred constantly in the barrel of the GS 2000 pump utilized for injection and RegenOx was pumped into the borings, while the mixing process continued in the drums for the next portion of OAC.

The delivery hose was connected to the pump outlet and the delivery sub-assembly. Water was circulated through the hose and the delivery sub-assembly to displace air in the hose. The sub-assembly was connected to the drive rod. After confirming that all of the connections were secure, the RegenOx was pumped through the delivery system.

RegenOx injection continuously progressed while the drive rods were slowly withdrawn at 1-foot intervals. The predetermined volume of RegenOx was pumped into the aquifer across the desired treatment area. When aquifer acceptance was low, enough time was allowed for the aquifer to equilibrate prior to removing the drive rod. The rods were cleaned after each injection.

The procedure was repeated until it reached the top of the targeted treatment interval and treatment of the entire 14-foot contaminated vertical zone was achieved. The procedure was repeated for each of the seven borings until all the RegenOx was inserted into the groundwater zone.

A bentonite seal was installed above the RegenOx material in each boring. A proper surface seal assures that the RegenOx remains properly placed and will prevent contaminant migration from the surface. Each borehole was sealed immediately following RegenOx application to minimize RegenOx surfacing during the injection process.

The borings were finished at the surface with a concrete cap. A quick set concrete was used to provide a good surface seal with minimal set up time. Prior to emplacing the boring seal, clean sand was placed in the boring to the top of the RegenOx treatment zone. Bentonite chips or granular bentonite was placed immediately above the treatment zone, followed by a cement/bentonite grout to roughly 0.5 feet below ground surface. Quick-set concrete then was used as a surface seal.

Placing the OAC into the borings was designed to help in removing the contamination from the groundwater.

GROUNDWATER SAMPLING AND ANALYSIS OF ESTABLISHED WELLS

On 2/8/06, a groundwater sample was collected utilizing a Waterra WSP-12V-2 12 volt submersible pump equipped with flow controller. It was performed using the low flow purging and sampling procedure employed by EPA Region II from a new permanent down gradient monitoring well (see Sampling Plan). The groundwater sample was collected at a 21-foot depth.

In addition to groundwater sampling performed at the monitoring well, one matrix spike, one matrix spike duplicate, one field blank, and one trip blank were also taken.

After all sampling activities were completed, samples were delivered to H2M Labs, Inc. 575 Broad Hollow Road, Melville, New York 11747, where they were analyzed for xylene, benzene, toluene, and ethylbenzene using analytical Method 8260B.

Prior to well sampling, the well was purged until measurements of pH, conductivity, dissolved oxygen (DO), and turbidity were stable for 3 consecutive readings. The purpose of this low flow purging and sampling procedure is to collect groundwater samples from a monitoring well that are representative of groundwater conditions in the geological formation. Hence, the intake velocity of the sampling pump was set at a 200 ml/min flow rate, which would limit drawdown inside the well casing. The actual volume of groundwater in the monitoring well casing was approximately 5.16 gallons. The actual volume of groundwater purged was approximately 5.02 gallons. Equilibrium was determined and purging terminated by testing the pumped water for pH, conductivity, DO and turbidity using a Horiba U22XD water quality monitoring system. Immediately

after the well was purged, groundwater samples were collected and placed in 40 ml vials with HCL Preservative.

The groundwater elevation was measured using a Solinst 122 Mini Interface Meter, to the nearest one hundredth of a foot (0.12 inches) relative to the top of the well casing. The Solinst 122 Mini Interface Meter was used to measure the free product thickness in the monitoring well. A record of all measurements was maintained, including the linear measurement of groundwater in the well casing. No free product was detectable in the well using the Solinst 122 Meter, which has a 0.01-foot detection limit (0.12 inches).

RESULTS

Sample results received from H2M Laboratories, Inc. present the concentration of VOC contaminants detected for all the groundwater and soil sampling (see Appendix "C").

Table #1 presents a summary of the groundwater sample location and the concentration in ug/L (ppb) of each compound analyzed.

Table #2 presents a summary of the soil sample locations and the concentration in ug/kg (ppb) of each compound analyzed.

FINDINGS

Concentrations of groundwater testing conducted at 1101 Linwood Street, Brooklyn, New York 11208 from a new permanent down gradient monitoring well indicate no presence of BTEX compounds.

The three (3) soil samples that were taken utilizing the Geo-Probe had elevated levels of ethylbenzene and xylene at the locations #1 & 2 and an elevated level of xylene at the location #3.

DISCUSSION

Analysis of the groundwater obtained from the new monitoring well revealed that the sample contained no detectable levels of BTEX. All three soil samples collected at locations # 1, 2 & 3 contained elevated levels of BTEX.

CONCLUSION

Results from the January 2006 soil testing indicate that the level of contamination, which occurred prior to the purchase of the building by S&S X-Ray in 1986, appear to be high around the spill area. Results of the February 2006 groundwater testing indicate no presence of contaminants at the permanent down gradient monitoring well. Removal of the contaminated soil, as discussed in the Remedial Action Work Plan dated April 9, 2004, and RegenOx injection into the groundwater immediately under the excavation area should eliminate any potential adverse environmental impact. No additional remediation is recommended.

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TABLE #2							
RESULTS OF SOIL SAMPLES AT LOCATIONS #1, 2 & 3							
CLIENT: SHSFLATLANDS LLC				JOB NO.: 01-44			
ADDRESS: 80 FAHY AVENUE, STATEN ISLAND, NY 10314							
SAMPLING ADDRESS: 1101 LINWOOD STREET, BROOKLYN, NEW YORK 11208							
SAMPLE LOCATION	SAMPLE DATE	ANALYTICAL PARAMETERS (ug/Kg) PPB					
		MTBE	BENZENE	TOLUENE	ETHYLEBENZE	XYLENE	
SB - 1	01/18/2006	< 60	< 8	410	200000 D	1200000 D	
SAMPLE LOCATION	SAMPLE DATE	ANALYTICAL PARAMETERS (ug/Kg) PPB					
		MTBE	BENZENE	TOLUENE	ETHYLEBENZE	XYLENE	
SB - 2	01/18/2006	< 56	< 8	< 56	1000	29000 D	
SAMPLE LOCATION	SAMPLE DATE	ANALYTICAL PARAMETERS (ug/Kg) PPB					
		MTBE	BENZENE	TOLUENE	ETHYLEBENZE	XYLENE	
SB - 3	01/18/2006	< 57	< 8	< 57	< 57	20000 D	
<p>QUALIFIERS FOR ORGANICS DATA</p> <p>< = INDICATES COMPOUND WAS ANALYZED FOR BUT NOT DETECTED AT QUANTIFICATION LIMIT INDICATED</p> <p>D = SAMPLE DILUTED FOR ANALYSIS</p> <p>ANALYTICAL DATA WAS OBTAINED FROM H2M LABS, INC. SEE H2M LABS' RESULTS IN APPENDIX "C".</p>							
LARRY ZEMAN:							
SIGNATURE				DATE			

APPENDIX "A"

SAMPLING LOCATIONS
AND RESULTS

01-44

1101 LINWOOD STREET
BROOKLYN, NEW YORK 11208

DRAWING

APPENDIX "B"

WELL PURGING AND SAMPLING FORM

(516) 791-2300

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Well Purging and Sampling Form

Client: S&S X-Ray Products, Inc. & S&S FLATLANDS, LLC Contact Person: Robert LoPinto, P.E., SPECProject Location: 1101 Linwood Street, Brooklyn, N.Y. 11208 Job #: 01-44Date: 02/08/06 Time: 9:55Weather Conditions: Dry, Cold, Sunny

Well Information

Well #: GWPWell Location (in reference to permanent structures or features): Sidewalk on Linwood St. southwest to the building
Well Coordinates (in reference to permanent structures or features): 74'-8" North & 5'-3" West from southwest corner of the buildingDiameter of Well Flush Mount: 8.5"Diameter of Casing: 2"

Before Purging

Is Free Product Present (Yes/No, thickness) (ft., in.): NOTotal Depth of Well From Top of Casing or Surveyor's Mark (ft., in.): 21'Depth From Top of Casing or Surveyor's Mark to Groundwater (ft., in.): 13.15'Linear Measurement of Groundwater in the Casing (ft., in.): 7.85'Estimated Volume of Groundwater in Casing ($V = \pi \cdot r^2 \cdot h$ or $= 0.7856 \cdot h \cdot d^2$, 1 gal. = 0.1337 ft³, or 1 ft³ = 7.481 gal.) (gal.):

Purging	TIME	pH	Do	Tu	Cond.
Start Purge Time (24 hr. Clock): <u>9:55</u>	10:30	6.21	0.19	369	1.98
	10:35	6.23	7.56	247	1.99
End Purge Time (24 hr. Clock): <u>11:30</u>	10:40	6.26	10.28	184	1.99
	10:45	6.29	11.52	215	2.02
Purge Method (bladder pump, bailer, etc.): <u>pump in well</u>	10:50	6.29	0.19	180	1.97
Purge Rate (gal./min.): <u>200 ml/min</u>	10:55	6.28	1.41	660	1.99
	11:00	6.33	0.00	236	1.94
Purge Range (Estimated Volume of Groundwater in the Casing multiplied by 3 and 5) (gal.):	11:05	6.31	0.00	141	1.98
Total Volume Purged (gal.):	11:10	6.30	5.00	112	1.96
	11:15	6.27	0.02	94.0	1.98
Sampling	11:20	6.28	0.00	28.5	1.98
Groundwater Sample #: <u>GWP-1, GWP-1-MS, GWP-1-MSD</u>	11:25	6.28	0.00	27.0	1.97
Sampling Method: <u>Submersible Pump</u>	11:30	6.28	0.00	26.9	1.97

Start Sample Time (24 hr. Clock): 11:33Sampled by: Larry ZemanEnd Sample Time (24 hr. Clock): 11:34Signature: [Signature]

DATA/OFFICE/REPORTS/S&S X-RAY/Well Form 1wp

1101 LINWOOD STREET
BROOKLYN, NEW YORK 11208

APPENDIX "C"

CHAIN OF CUSTODY
H2M LABS, INC. LABORATORY RESULTS

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1101 LINWOOD STREET
BROOKLYN, NEW YORK 11208

1A
VOLATILE ORGANICS ANALYSIS DATA SHEET

HPA SAMPLE NO.

GWP-1

Lab Name: H2M LABS, INC. Contract: _____

Lab Code: 10478 Case No.: SHA SAS No.: _____ SDG No.: SHA002

Matrix: (soil/water) WATER Lab Sample ID: 0602274-001A

Sample wt/vol: 5 (g/mL) ML Lab File ID: A\A44844.D

Level: (low/med) LOW Date Received: 02/08/06

% Moisture: not dec. Date Analyzed: 02/16/06

GC Column: R-502.2 ID: .53 (mm) Dilution Factor: 1.00

Soil Extract Volume: _____ (μL) Soil Aliquot Volume _____ (μL)

CAS NO.	COMPOUND	CONCENTRATION UNITS:	
		(μg/L or μg/Kg)	UG/L Q
1634-04-4	Methyl tert-butyl ether	5	U
71-43-2	Benzene	0.7	U
108-88-3	Toluene	5	U
100-41-4	Ethylbenzene	5	U
1330-20-7	Xylene (total)	5	U

1101 LINWOOD STREET
BROOKLYN, NEW YORK 112081A
VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

LOCATION #1

Lab Name: H2M LABS, INC.

Contract: _____

Lab Code: 10478Case No.: SHA

SAS No.: _____

SDG No.: SHA001

Matrix: (soil/water)

SOILLab Sample ID: 0601503-001ASample wt/vol: 5(g/mL) QLab File ID: 6\P30853.D

Level: (low/med)

LOWDate Received: 01/18/06

% Moisture: not dec.

16.1Date Analyzed: 01/26/06GC Column: R-502.2ID: .53 (mm)Dilution Factor: 10.00

Soil Extract Volume: _____

(μL)

Soil Aliquot Volume _____

(μL)

CONCENTRATION UNITS:

CAS NO.	COMPOUND	(pg/L or pg/Kg	UG/KG	Q
1634-04-4	Methyl tert-butyl ether	60		U
71-43-2	Benzene	8		U
108-88-3	Toluene	410		
100-41-4	Ethylbenzene	390000		E
1330-20-7	Xylene (total)	290000		E

FORM I VOA - 1

OLM04.2

SHA001 S15

1101 LINWOOD STREET
BROOKLYN, NEW YORK 11208

1A
VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

LOCATION #1DL

Lab Name: H2M LABS, INC. Contract: _____

Lab Code: 10478 Case No.: SHA SAS No.: _____ SDG No.: SHA001

Matrix: (soil/water) SOIL Lab Sample ID: 0601503-001ADL

Sample wt/vol: 4 (g/mL) Q Lab File ID: A\A44550.D

Level: (low/med) MD Date Received: 01/18/06

% Moisture: not dec. 16.1 Date Analyzed: 01/27/06

GC Column: R-502.2 ID: .53 (mm) Dilution Factor: 1,000.00

Soil Extract Volume: 10000 (μL) Soil Aliquot Volume 100 (μL)

CAS NO.	COMPOUND	CONCENTRATION UNITS:	
		(μg/L or μg/Kg UG/KG	Q
1634-04-4	Methyl tert-butyl ether	15000	U
71-43-2	Benzene	2100	U
108-88-3	Toluene	15000	U
100-41-4	Ethylbenzene	200000	D
1330-20-7	Xylene (total)	1200000	D

FORM I VOA - 1

OLM04.2

SHA001 S16

1101 LINWOOD STREET
BROOKLYN, NEW YORK 11208

1A
VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.
LOCATION #2

Lab Name: H2M LABS, INC. Contract: _____

Lab Code: 10478 Case No.: SHA SAS No.: _____ SDG No.: SHA001

Matrix: (soil/water) SOIL Lab Sample ID: 0601503-002A

Sample wt/vol: 5 (g/mL) g Lab File ID: 6\P30857.D

Level: (low/med) LOW Date Received: 01/18/06

% Moisture: not dec. 10.2 Date Analyzed: 01/26/06

GC Column: R-502.2 ID: .53 (mm) Dilution Factor: 10.00

Soil Extract Volume: _____ (μL) Soil Aliquot Volume _____ (μL)

CAS NO.	COMPOUND	CONCENTRATION UNITS:	
		(μg/L or μg/Kg)	UG/KG Q
1634-04-4	Methyl tert-butyl ether	56	U
71-43-2	Benzene	8	U
108-88-3	Toluene	56	U
100-41-4	Ethylbenzene	1000	
1330-20-7	Xylene (total)	15000	E

1101 LINWOOD STREET
BROOKLYN, NEW YORK 112081A
VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

LOCATION #2DL

Lab Name: H2M LABS, INC. Contract: _____

Lab Code: 10478 Case No.: SHA SAS No.: _____ SDG No.: SHA001

Matrix: (soil/water) SOIL Lab Sample ID: 0601503-002ADL

Sample wt/vol: 4 (g/mL) G Lab File ID: A\A44551.D

Level: (low/med) MRD Date Received: 01/18/06

% Moisture: not dec. 10.2 Date Analyzed: 01/27/06

GC Column: R-502.2 ID: .53 (mm) Dilution Factor: 1.00

Soil Extract Volume: 10000 (μL) Soil Aliquot Volume 100 (μL)

CAS NO.	COMPOUND	CONCENTRATION UNITS:	
		(μg/L or μg/Kg UG/KG	Q
1634-04-4	Methyl tert-butyl ether	700	U
71-43-2	Benzene	97	U
108-88-3	Toluene	700	U
100-41-4	Ethylbenzene	1800	D
1330-20-7	Xylene (total)	29000	D

1101 LINWOOD STREET
BROOKLYN, NEW YORK 11208

1A
VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.
LOCATION #3

Lab Name: H2M LABS, INC. Contract: _____

Lab Code: 10478 Case No.: SHA SAS No.: _____ SDG No.: SHA001

Matrix: (soil/water) SOIL Lab Sample ID: 0601503-003A

Sample wt/vol: 5 (g/mL) G Lab File ID: 6\P30859.D

Level: (low/med) LOW Date Received: 01/18/06

% Moisture: not dec. 13 Date Analyzed: 01/26/06

GC Column: R-502.2 ID: .53 (mm) Dilution Factor: 10.00

Soil Extract Volume: _____ (μL) Soil Aliquot Volume _____ (μL)

CAS NO.	COMPOUND	CONCENTRATION UNITS:	
		(μg/L or μg/Kg)	UG/KG Q
1634-04-4	Methyl tert-butyl ether	57	U
71-43-2	Benzene	8	U
108-88-3	Toluene	57	U
100-41-4	Ethylbenzene	57	U
1330-20-7	Xylene (total)	25000	E

1101 LINWOOD STREET
BROOKLYN, NEW YORK 11208

1A
VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

LOCATION #3DL

Lab Name: H2M LABS, INC. Contract: _____

Lab Code: 10478 Case No.: SHA SAS No.: _____ SDG No.: SHA001

Matrix: (soil/water) SOIL Lab Sample ID: 0601503-003ADL

Sample wt/vol: 4 (g/mL) G Lab File ID: A\A44552.D

Level: (low/med) MD Date Received: 01/18/06

% Moisture: not dec. 13 Date Analyzed: 01/27/06

GC Column: R-502.2 ID: .53 (mm) Dilution Factor: 1.00

Soil Extract Volume: 10000 (μL) Soil Aliquot Volume 100 (μL)

CONCENTRATION UNITS:

CAS NO.	COMPOUND	(μg/L or μg/Kg UG/KG)	Q
1634-04-4	Methyl tert-butyl ether	720	U
71-43-2	Benzene	100	U
108-88-3	Toluene	720	U
100-41-4	Ethylbenzene	720	U
1330-20-7	Xylene (total)	20000	D

FORM I VOA - 1

OLM04.2

SHA001 S20

APPENDIX "D"

PHOTOGRAPHIC LOG AND PHOTOGRAPHS



01/18/2006 - Permanent Down Gradient
Monitoring Well Installation
Boring

01/18/2006 - Groundwater Well



01/18/2006 - Soil Sampling with
Geo-Probe Unit

01/18/2006 - Capped Monitoring
Well



01/19/2006 - RegenOx Mixing



01/19/2006 - Adding Activator to the
Mixture



01/18/2006 - RegenOx Injection



01/20/2006 - RegenOx Injection at
Location # 8



01/20/2006 - RegenOx Injection at
Location # 3



02/08/2006 - Groundwater Purging



02/08/2006 - Monitoring Well Locked
after Sampling



02/08/2006 - Sealed Monitoring Well

APPENDIX “E”

DATA USABILITY SUMMARY REPORT

DATA USABILITY SUMMARY REPORT**GENERAL**

This Data Usability Summary Report (DUSR) provides a thorough evaluation of the analytical data submitted by H2M Labs, Inc. for the purpose of determining whether or not the data meets the required level of quality. The DUSR is developed by reviewing and evaluating the analytical data packages. This review is facilitated by answering standard questions relating to the quality of the data, and by following guidance in the USEPA Contract Laboratory Program (CLP) Statement of Work for Organic Analysis. A groundwater sample collected at 1101 Linwood Street, Brooklyn, was analyzed under data sample package SHA002, while three soil samples were analyzed under data sample package SHA001. A separate DUSR will be performed below for each Data Package, followed by summary comments on the overall data.

DATA PACKAGE SHA002

1. *Is the data package complete under the requirements of New York State Department of Environmental Conservation Analytical Services Protocol (ASP) Category B?*

A review of the data package indicates it contains all the required documentation. This data package consists of one sample, one matrix spike, one matrix spike duplicate, one trip blank and one field blank. The chain of custody is complete, and matches the data in the report regarding sample identification. The sample receipt checklist indicates the sample and chain of custody as delivered were in compliance with the appropriate requirements, including preservation, except that some vials had headspace.

2. *Have all holding times been met?*

GWP-1 sample was collected on 2/8/06. The sample was analyzed on 2/16/06, within at least 9 days, which is well below the limit of 14 days for preserved samples. No flags, actions or qualifications were applied to the data based on the holding time.

3. *Do all the QC data: blanks, instrument tunings, calibration standards, calibration verifications, surrogate recoveries, spike recoveries, replicate analysis, laboratory controls and sample data fall within the protocol required limits and specifications?*

A review of QA/QC data indicates no discrepancies with the following: the initial and continuing calibration; internal standards; the contract required detection limit (CRDL) standard; method blank; field blank; trip blank; and spike samples. The sample results' data are within the protocol and instrument limits. Samples GWP-1-MS and GWP-1-MSD were utilized for the spike and the duplicate QC analysis. The spike and duplicate analyses were within the required limits.

4. *Have all of the data been generated using established and agreed upon analytical methods?*

The analytical method 8260B used for analysis is the approved method listed in Item No. 180.2 of the NYS Department of Health Environmental Laboratory Approval Program Certification Manual.

5. *Does an evaluation of the raw data confirm the results provided in the data summary sheets and Quality Control verification forms?*

Yes, an evaluation of the raw data confirms the results provided in the data summary sheets and the Quality Control verification forms.

6. *Have the correct data qualifiers been used?*

A review of all QA/QC results indicates that the laboratory applied the correct qualifiers to the appropriate sample results. Also, the proper qualifiers have been noted in the report's table of results.

7. Conclusion

Based on a review of the entire data package, it has been determined that all data results are acceptable and meet or exceed the required Quality Controls.

DATA PACKAGE SHA001

1. *Is the data package complete under the requirements of New York State Department of Environmental Conservation Analytical Services Protocol (ASP) Category B?*

A review of the data package indicates it contains all the required documentation. This data package consists of three samples, one matrix spike, one matrix spike duplicate, and one trip blank. The chain of custody is complete, and matches the data in the report regarding sample identification. The sample receipt checklist indicates the samples and chain of custody as delivered were in compliance with the appropriate requirements, including preservation. Sample location #1 was analyzed as the matrix spike/matrix spike duplicate.

2. *Have all holding times been met?*

The samples were collected on 1/18/06. The samples were analyzed on 1/26/06 and 1/27/06, within 9 - 10 days, which is well below the limit of 14 days. No flags, actions or qualifications were applied to the data based on the holding time.

3. *Do all the QC data: blanks, instrument tunings, calibration standards, calibration verifications, surrogate recoveries, spike recoveries, replicate analysis, laboratory controls and sample data fall within the protocol required limits and specifications?*

A review of QA/QC internal standards indicates no discrepancies with the following: the initial and continuing calibration; internal standards the contract required detection limit (CRDL) standard; method blanks and surrogate spike sample. The samples' results data are within the protocol and instrument limits. Samples matrix spike and matrix spike duplicate from location #1 were utilized for the spike and duplicate QC analysis. The spike analysis and duplicate were within the required limits.

4. *Have all of the data been generated using established and agreed upon analytical methods?*

The analytical method 8260B used for analysis is the approved method listed in Item No. 180.3 of the NYS DOH Environmental Laboratory Approval Program Certification Manual.

5. *Does an evaluation of the raw data confirm the results provided in the data summary sheets and Quality Control verification forms?*

Yes, an evaluation of the raw data confirms the results provided in the data summary sheets and the Quality Control verification forms.

6. *Have the correct data qualifiers been used?*

A review of all QA/QC results indicates that the laboratory applied the correct qualifiers to the appropriate sample results. Also, the proper qualifiers have been noted in the report's table of results.

7. Conclusion

Based on a review of the entire data package, it has been determined that all data results are acceptable and meet the required Quality Controls.

SUMMARY

The data presented on the report's table of results is an acceptable representation of the true value of all contaminants tested. Where laboratory results were above the instrument detection limit, but below the laboratory required detection limit, the actual value is presented.

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MAY 4, 2006

CERTIFICATION

The data produced in this Report is certified to be a true copy of the Field and Analytical Data.

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MAY 4, 2006