

New York State Department
of Environmental Conservation

NORTH LAWRENCE OIL DUMP SITE
ST. LAWRENCE CO. NYSDEC SITE NO. 6-45-013

CONTRACT NO. D003472

SAMPLING AND ANALYSIS PLAN

prepared by

IEM SEALAND Corporation

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August 14, 1996

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SECTION 1.0

INTRODUCTION

1.1 GENERAL

This Sampling and Analysis Plan is intended for use by all personnel associated with New York State Department of Environmental Conservation (NYSDEC), North Lawrence Oil Dump site, located in the Town of Lawrence, New York, under the referenced contract. The plan was prepared in accordance with Section 01410 of the contract specification and for the exclusive use of IEM SEALAND Corporation for use on the project. The use of this plan by others and for purposes other than for which it is intended is strictly prohibited.

1.1.1 Reference Standards

- A. Test Methods for Evaluating Solid Waste (EPA SW-846)
- B. Soil Sampling Quality Assurance User Guide, Second Edition (EPA/600/8-89/046).
- C. Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA- (EPA/548/G-89/004).
- D. Analytical Services Protocol (ASP), NYSDEC, December, 1991.

1.1.2 Key Personnel Responsible for Administration of the SAP

Ms. Linda Quackenbush is the Quality Assurance Officer (QAO) for this project. Her sole responsibilities for this project include development of the sampling and analytical portions of the Contractor Quality Control Plan and this SAP. The QAO or her designee will conduct periodic field and sampling audits, interface with the analytical laboratory to make requests and resolve problems, interface with the data validator and develop a project specific data usability report.

Ms. Quackenbush is proficient in analytical methodology, data interpretation and validation, the development of sampling plans, quality control procedures and auditing techniques. A copy of her resume and OSHA safety training certifications, including CPR and First Aid are located in **Appendix A**.

1.2 SITE LOCATION AND BACKGROUND INFORMATION

The work to be carried out under these specifications is located in St. Lawrence County, in the Town of Lawrence, New York.

The Site Number of this project is No. 6-45-013. Access to the site is via McAuslen Road in the Town of Lawrence, New York.

1.3 CURRENT CONDITIONS AND SCOPE OF WORK

The scope of Work for the project, as described in the specification, is as follows:

1. Excavation and treatment of sludge, soil and wetland sediments by solidification/stabilization.
2. Construction of an on-site disposal cell and placement of solidified/stabilized materials within the disposal cell.
3. Construction of a cap on the disposal cell.
4. Restoration of affected wetlands and filling and grading of the excavated lagoon.

1.4 PURPOSE

The purpose of the Sampling and Analysis Plan is to outline special procedures for sampling and analytical activities including:

- Characterization of the site prior to any construction activities;
- Characterization of the site after the completion of construction activities and site cleanup;
- Characterization of wetland sediment and lagoon soil following excavation to document residual concentrations and to determine if additional excavation is warranted;
- Characterization of each batch of stabilized material;
- Sampling documentation in compliance with technical specification Section 01410.

SECTION 2.0

SAMPLING PROCEDURES AND REQUIREMENTS

2.1 PRE-CONSTRUCTION SAMPLING

Prior to the commencement of site activities (grubbing and clearing), ten (10) soil samples will be collected from areas of expected operations. The locations of these samples will be approved by the NYSDEC Project Engineer. The targeted contaminants to be analyzed for in these samples will consist of total mercury (EPA Method 7471), lead (EPA Method 200.7 CLP-M), and PCBs (EPA Method 8080). Sampling procedures will comply with USEPA and NYSDEC standards referenced in this document.

2.2 POST-CONSTRUCTION SAMPLING

Upon completion of all construction activities and site cleanup, ten (10) surface soil samples will be collected from the operations areas at the site. The locations of these samples will be approved by the NYSDEC Project Engineer. The targeted contaminants to be analyzed for in these samples will consist of total mercury (EPA Method 7471), lead (EPA Method 200.7 CLP-M), and PCBs (EPA Method 8080). Sampling procedures will comply with USEPA and NYSDEC standards referenced in this document.

2.3 WETLAND SEDIMENT/LAGOON SOIL SAMPLING

Upon completion of the initial excavation to a depth of one foot and to the limits established on the contract drawings, twelve (12) samples will be collected from the bottom of the excavation at locations determined by the NYSDEC Project Engineer. These samples will be collected utilizing one of several options:

Option 1: Excavator is utilized to create small sampling pit from which sample is then collected utilizing disposable sampling apparatus. If conditions are such that personnel are not able to enter the floor area, the excavator bucket will scoop material from the targeted area and the sample will be collected from the center of the bucket.

Option 2: Stainless steel hand augers or other sampling device is utilized to collect the samples. Sampling device is decontaminated prior to reuse.

Sediment samples will also be collected along the sidewalls of the wetland excavation and from the inner berm face of the surface water containment berm. These samples will be collected at a maximum horizontal interval of 100 feet and at locations determined by the NYSDEC Project

Director. Based upon the depth of the excavation and suitability of the wall material, the samples will be collected with disposable sampling apparatus. Where this is not feasible, the excavator bucket will be utilized to remove a portion of the wall. The sample will then be collected from the center of the material in the excavator bucket.

Following receipt and review of the above analytical results, the NYSDEC Project Engineer will determine whether additional excavation in the lagoon is warranted. For excavations greater than 4 feet in depth, one (1) sample will be collected for every 40 cubic yards of sediment. Sample locations will be determined by the NYSDEC Project Engineer. Sampling procedures will comply with USEPA and NYSDEC standards referenced in this document. The collection of samples by site personnel will be performed by the method most appropriate for the material and which does not violate the HASP.

2.4 STABILIZED MATERIAL SAMPLING

Excavated sediment that has been stabilized will be sampled prior to final on-site disposal. A minimum of three (3) samples will be collected from each batch of stabilized material. These samples will be composited to produce one sample for TCLP analysis. The samples will be cured for four (4) days prior to producing a TCLP (EPA Method 1311). Sampling procedures will comply with USEPA and NYSDEC standards referenced in this document. A single "batch" of material will consist of approximately 300 yards of stabilized material. Stabilization of the material will be accomplished by mixing excavated material with the stabilizing agent on a 5:1 ratio.

2.5 QUALITY ASSURANCE/QUALITY CONTROL SAMPLING

The quality of analytical data generated in the laboratory will be monitored by the analysis of method blanks, laboratory control sample method blank spikes, EPA performance samples and laboratory control standards. For this project, laboratory duplicate samples, fortified samples (matrix spikes) and fortified duplicate samples will be analyzed. These analyses generate matrix-dependent data and will be used to assess analytical precision and accuracy. Trip blanks will be analyzed only for volatile water samples.

Field quality control samples (field duplicates) will be collected on a ratio of 1:20 (one per twenty field samples collected.) These field duplicates will be indicated in the field notebook and will be a blind to the laboratory. Should nondedicated/nondisposable sampling apparatus be utilized which must be decontaminated, field blanks will be collected on a daily basis. Field blanks will be collected to ensure that the sampling apparatus has been adequately cleaned and that there is no cross-contamination between samples.

SECTION 3.0

SAMPLE DOCUMENTATION

3.1 SAMPLE HANDLING AND CHAIN OF CUSTODY

A field sampling log (field notebook) will be maintained during the course of the project. This log will document the sample number, collection date, sample location, and analytical parameters. Chain-of-custody forms will be generated for each shipment of samples submitted to the contract lab for analysis. In addition, copies of the shipping forms shall also be kept on file. These forms will correlate with the shipment/arrival of samples to the contract lab. Laboratory receipt and/or laboratory chain-of-custody forms will also be kept on file.

These documents will provide a record of each samples' date of collection, date of shipment, and the individual(s) responsible for sample collection, shipment and receipt.

The collected samples will be staged for batching and paperwork checks. Labels, tags and log information will be checked to ensure proper identification. Samples analyzed off-site will be packaged to prevent breakage or leakage, and labeled according to Department of Transportation (DOT) regulations for transport. Copies of all chain-of-custody forms will be maintained for the project record.

3.2 FIELD COLLECTION AND SHIPMENT

Prior to sample collection, labels will be affixed to sample containers with transparent tape, if necessary. Indelible, waterproof ink will be used for all logbook and sample label entries. Sample logbook entries will include information on the sample label and additional information as appropriate.

Samples will be placed in containers compatible with the intended analysis and properly preserved. USEPA and NYSDEC requirements for various analytical parameters with respect to the type of container, preservation method and maximum holding time between collection and analysis will be followed. **Table 3-1** outlines sample container preservative and holding time requirements.

The following will be the containers utilized in the sampling of the site materials:

Soils: VOCs - two 60-ml clear wide mouth full glass jar with Teflon/Teflon coated lid.

Metals and PCBs - one 8 ounce clear glass wide mouth jar with Teflon/Teflon coated lid.

TABLE 3-1
Sample Container Requirements

Parameter	Container	Preservative	Holding Time
Soil Testing (Conformance)			
Metals Lead (Pb)	One 8 oz (100 g) clear glass, wide-mouth bottle, 3/4 full with Teflon cap liner.	Cool to 4 °C	Analyze within 180 days VTSR.
Metals Mercury (Hg)	One 8 oz. (100 g) glass, wide mouth bottle, 3/4 full with Teflon cap liner.	Cool to 4 °C	Analyze within 26 days VTSR.
Volatile Organics	Two 60 ml wide mouth glass bottles, full with Teflon-liner lid.	Cool to 4 °C	Analyze within 10 days VTSR
PCBs	One 8 oz (100 g) clear glass, wide-mouth bottle, 3/4 full with Teflon cap liner.	Cool to 4 °C	Extract within 10 days VTSR and analyze within 40 days of extraction.
Air Testing			
Metals Mercury (Hg) Lead (Pb)	Glass fiber filter.	Not Applicable	Analyze within 180 days VTSR, except mercury within 26 days VTSR.
PCBs	Polyurethane foam ("Puff cartridge")	Cool to 4 °C	Analyze within 7 days from collection.

VTSR = Verified Time of Sample Receipt

Water: VOCs - three (3) 40 ml vials with Teflon septum lids, preserved with HCL to pH of less than 2.0.

Metals - two (2) 50 ml plastic containers with plastic lids, preserved with H₂SO₄ to pH of less than 2.0.

PCBs - two (2) one (1) liter amber glass jars, no preservative.

Each sample container will be individually labeled. The container label will contain the following information:

- Project number and site name;
- Unique sample number;
- Sample description;
- Sample date and time;
- Initials of sampling technician; and
- Description/method of sample preservation

3.3 RECORDKEEPING

Data related to all sample preparation and analysis and observations by sampling technicians will be recorded in bound field notebooks. Field notebook pages will be signed and dated daily. Information to be included in the field notebook will consist of the time, date and location of sample collection, sample description/type (i.e., sediment/excavation, soil/pre-construction), sample depth, drum number when applicable, type of sample preservation, sample container identification number, analysis requested and the name of the laboratory to which the samples were sent. Upon completion of the project, all field notebooks will be transmitted to the NYSDEC Project Engineer as part of the project record.

SECTION 4.0

ANALYTICAL REQUIREMENTS

4.1 ANALYTICAL PROCEDURES

All analytical procedures used by the laboratory for this sampling program will comply with the NYSDEC Analytical Services Protocol (December, 1991). Samples will be analyzed and results procured from the laboratory within seven (7) working days as outlined in Section 01410 of the Technical Specifications to prevent project delays. The analytical procedures will achieve the detection limits listed in the same section.

4.2 ANALYTICAL METHODS

Analytical methods for this project are presented in **Table 4-1**. A summary of sampling and analysis procedures, including remedial goals for clean up, is shown in **Table 4-2**.

4.3 LABORATORY SERVICES

IEM SEALAND Corporation has retained the services of IEA, Inc. The laboratory is New York State certified and is able to meet the method detection limits as specified in Section 01410 of the Technical Specifications. The laboratory will provide sample analytical reports with NYSDEC ASP Category B level QA/QC documentation. IEA, Inc. is NYSDOH ELAP CLP certified. A copy of their certification is located in **Appendix B**.

TABLE 4-1

Reference Analytical Methods for Soil and Air Analysis

REFERENCED METHOD	METHOD DESCRIPTION
Inorganics	
EPA Method 200.7 CLP-M	Lead (Pb) for Soil
EPA Method 6010	Lead (Pb) by TCLP for Soil
EPA Method 7471	Mercury (Hg) for Soil
EPA Method 7471	Mercury (Hg) by TCLP for Soil
EPA Method 40 CFR Part 50.6	Mercury (Hg)/Lead (Pb) Utilizing a High Volume Sampler for Air
Volatile Organic Compounds	
NYSDEC 91-1	Organic Analysis for Soil
Polychlorinated Biphenyls (PCBs)	
EPA Method 8080	For Soil
EPA Method 8080	By TCLP for Soil
EPA Method TO-4	Determination of Organic Chlorine Pesticides and PCBs in Ambient Air from "EPA Compendium of Methods for Determination of Toxic Organic Compounds in Ambient Air."

TABLE 4-2

Summary of Sampling and Analysis Procedures

Media	Parameter	EPA Method	Remedial Goals
Soil	Organics		
	VOCS	91-1 (NYSDEC)	Total TCE 0.7 mg/kg Total PCE 1.4 mg/kg Total Xylenes 1.2 mg/kg Total Toluene 1.5 mg/kg
	Metals		
	Lead (Pb)	200.7 CLP-M	500 mg/kg
	Mercury (Hg)	7471	0.11 mg/kg
	TCLP Lead (Pb)	6010	0.37 mg/L
	TCLP Mercury (Hg)	7471	0.20 mg/L
	Polychlorinated Biphenyls		
	PCBs	8080	Wetland - 0.11 mg/kg Lagoon - 1.0 mg/kg for Surface Soil Lagoon - 10 mg/kg at Bottom of Excavation
	TCLP PCBs	8080	No Remedial Goal, Detection Limit - Maximum of 1 mg/L
Air	Polychlorinated Biphenyls		
	PCBs	TO-4	
	Metals		
	Mercury (Hg)/Lead (Pb)	40 CFR Part 50.6	

SECTION 5.0

SAMPLING EQUIPMENT/DECONTAMINATION

5.1 SAMPLING EQUIPMENT

Sampling equipment which meets the requirements of the specified sampling techniques and achieves reliable and representative samples will be used. Consideration will be given to the compatibility of the material sampled with the composition of the sampler.

All sampling equipment used in collecting environmental samples will be either polytetrafluoroethylene (PTFE) or stainless steel. Sample equipment for the project will include:

- Stainless steel trowel and/or hand auger;
- Stainless steel mixing bowl;
- Sample jars and labels;
- Clean bucket to carry samples and equipment;
- Field log book;
- Field screening equipment;
- Latex/surgical gloves; and
- Decontamination equipment.

All sample containers will be obtained unused and precleaned from the laboratory with appropriate documentation regarding their precleaned state.

5.2 EQUIPMENT DECONTAMINATION

All sampling equipment will be decontaminated prior to use and at the end of the day. Decontamination procedures are as follows:

1. Remove all solids from the equipment using a brush and deionized water.
2. Wash the equipment in a solution of deionized water and Alconox (or similar).
3. Rinse sampling equipment with pesticide grade isopropanol.
5. Rinse sample equipment with deionized water.
6. Allow equipment to air dry in an area outside of the exclusion zone.

Wastewater generated during decontamination procedures will be collected and disposed of in an appropriate manner. Samples of the collected wastewater will be analyzed for the site contaminants to determine the appropriate method of disposal.

NAME: LINDA C. QUACKENBUSH

TITLE: Corporate Compliance Officer

COMPANY: IEM SEALAND Corporation

YEARS OF EXPERIENCE: With This Firm: 4 years

With Other Firms: 5 years

ACADEMIC BACKGROUND: B.S. Geophysics, Virginia Polytechnic Institute and
State University

CERTIFICATION/AFFILIATIONS/TRAINING:

OSHA Hazardous Waste Operations 29CFR 1910.120 (certified annually since 1990)
OSHA Site Supervisor 29CFR 1910.120 (1990)
Occupational Safety and Health Seminar, U.S. Army Corps of Engineers, New York District
ASTM: "Groundwater & Vadose Zone Monitoring & Sampling Technology" Seminar
"Capitalizing on the Brownfields Initiative" Conference
Maryland Department of the Environment "Consultant's Day" Seminar
Member - Society of Automotive Engineers
Red Cross First Aid and Adult CPR

RELEVANT PROJECT EXPERIENCE:

As Corporate Compliance Officer, Ms. Quackenbush prepares technical reports, work plans and cost and technical proposals. She reviews work activities, subcontractors/vendor qualifications and permits to approve waste disposal facilities and subcontractors. She prepares submittals which include Site Safety and Health Plans, Contractor Quality Control Plans and Spill Control Plans. She has a strong background in environmental information technology and federal and state regulations as they apply to work practices, treatment goals and disposal criteria. Ms. Quackenbush has over nine years of experience in environmental remediation, assessments and project management.

Prior to joining IEM SEALAND Corporation, Ms. Quackenbush was an Assistant Project Manager with H+GCL. For the H+GCL Washington, D.C. office, she started the environmental engineering department.

Prior to joining H+GCL, she was a laboratory supervisor in the Internal Ballistics Laboratory for Hercules, Inc. at the Radford Army Ammunitions Plant (RAAP) in Radford, Virginia. Prior to this time she was a Quality Control Engineer at the RAAP. She inspected and was knowledgeable with each propellant processing area, manufacturing area and test range.

- **Department of Defense (DOD), U.S. Army Corps of Engineers, On-Site Thermal Desorption Project, Fort Bliss, El Paso, Texas.** Corporate Compliance Officer of a \$2.5 million dollar soil remediation by low temperature thermal desorption project at six locations on the base. Soil contamination includes pesticides, herbicides and petroleum contamination. Project included demolition of buildings, excavation of soils, stockpile and transport of soils, and construction of all support facilities necessary to complete the work. In addition, assisted in preparation of work plans and submittals.

Company Resumes
IEM SEALAND Corporation

- **Department of Defense (DOD), U.S. Army Corps of Engineers, Montclair/West Orange and Glen Ridge Radium Sites, Barrow's Field and Carteret Street, Essex County, New Jersey.** Corporate Compliance Officer of a \$10.5 million dollar property remediation and restoration project. Excavation and transportation of low level radiologically contaminated soil will be transhipped via intermodals to a disposal facility in Clive, Utah. Assisted in preparation of Site Safety and Health Plan and other project submittals.
- **Department of Defense (DOD), U.S. Army Corp of Engineers, West Point Military Academy, West Point, New York.** Corporate Compliance Officer on a AST removal/UST closure and AST/UST installation project at the academy. A total of approximately 35 ASTs and USTs were included under the project specifications.
- **Department of Defense (DOD), U.S. Army Corps of Engineers, Fort Devens, Massachusetts.** Corporate Compliance Officer of a landfill cap improvement project for Shepley's Hill Landfill Operable Unit, a CERCLA NPL site located at Fort Devens. Responsible for preparation of the Site Safety and Health Plan and other project submittals.
- **CERCLA, Brookhaven National Laboratory (BNL), Upton, New York.** Corporate Compliance Officer for a remediation and restoration project at BNL, a Federal Superfund Site on the NPL. The work consists primarily of the closing of the Former and Interim Landfills and Slit Trench by capping with an impermeable cap. Wrote and assisted in preparation of various project work plans.
- **Department of Defense (DOD), U.S. Army Corp of Engineers, Loring Air Force Base, Limestone, Maine.** Corporate Compliance Officer on a \$3 million dollar UST closure project at a former air force base in Maine. Approximately twenty 50,000-gallon USTs and associated piping were removed.
- **RCRA Soil Remediation Project, Fusco & Langan, Waterbury, CT.** Corporate Compliance Officer for a \$3.5 million dollar remediation project to remove, treat and dispose of contaminated media generated at the 90 acre former Scovill Brass Center site. As Site Superintendent for one quarter, responsible for site health and safety, waste characterization including soil sampling and screening, and oversight of work activity. Wrote and assisted in preparation of work plans and project closeout report.
- **RCRA Soil Remediation Project, East-Central Medical City Facility, Worcester Redevelopment Authority.** Corporate Compliance Officer for a multi-million dollar remediation project to remove, treat and dispose of contaminated media generated in association with the redevelopment of a 26 acre site in downtown Worcester, MA.
- **UST Closure Services, Town of Natick, Natick, Massachusetts.** Corporate Compliance Officer, Town of Natick, Natick, Massachusetts. Project included the removal of 325 residential underground storage tanks and remediation of multiple sites.
- **RCRA Soil Remediation Project, Worcester Redevelopment Authority.** Corporate Compliance Officer for a multi-million dollar remediation project to remove, treat and dispose of contaminated media generated in association with the redevelopment of a 26 acre site in downtown Worcester, MA.
- **UST Management and Closure.** Project manager for closure services for USTs located in commercial and industrial settings. USTs included waste chemical, heating oil, propane and petroleum products. Planned and directed a UST Management Plan for a US Army facility that included five locations and approximately 50 USTs.

Company Resumes
IEM SEALAND Corporation

- **TSDF Compliance Audits.** Project manager as well as conducted over eight TSDF and soil and PCB recycling facilities audits for use by a major utility company in evaluating preferred waste contractors. The TSD facilities were located in five states and included landfills, incinerators and reclamation facilities.
- **SPCC Plans.** Project manager for preparation of Spill Prevention and Countermeasure Control Plans for ASTs at 12 properties in the metropolitan DC area. The plans were prepared in accordance with federal, state and local laws.
- **OSHA and ASHRAE Studies.** Project manager and environmental scientist for Indoor Air Quality surveys for project locations which included the Pentagon. Conducted OSHA compliance testing for a wide variety of air contaminants, including perchloroethylene at dry cleaning facilities, utilizing personnel and area sampling techniques.
- **Environmental Site Assessments, Eastern United States.** As project manager and geologist, conducted Phase I, Phase II and Phase III environmental site assessments, development of remedial cost estimates and liaison with regulatory officials.



CERTIFICATE OF COMPLETION

This is to certify that

LINDA C. HOEM

has successfully completed


THE 10-HOUR HAZARDOUS MATERIALS SITE WORKER COURSE


at

HAZMAT T.I.S.I., COLUMBIA, MARYLAND

AUGUST 3, 1990

Date


Manager, Training Services Department


President

Safety Systems Inc. Certificate of Achievement

This certificate of Achievement
is to Acknowledge
Safety Systems Inc.
Linda C. Quackenbush

ENVIRONMENTAL HEALTH & SAFETY TRAINING
500 J. C. FINE
FREDERICKSBURG, VIRGINIA 22407-1225
1-800-640-2000



has successfully completed
OSHA & EPA - Hazardous Waste Operations
and Emergency Response Refresher - 8 Hour

Requirements as prescribed by the Occupational Safety & Health Administration
and the Environmental Protection Agency's 29 CFR 1910.120

Date: September 30, 1995

Daniel C. Blumbot

President
Daniel C. Blumbot

Instructor



CERTIFICATE OF COMPLETION

This is to certify that

LINDA HOLM

has successfully completed

OSHA ON-SITE MANAGEMENT AND SUPERVISION COURSE

at

HAZMAT T.I.S.I., COLUMBIA, MARYLAND

September 21, 1990

Date

Leonard G. Deanna
R. Berfield



This certifies that
Lina Quackembush
has completed the requirements for
STANDARD FIRST AID
sponsored by
NATIONAL CAPITAL CHAPTER

Date completed
06-20-96



This certifies that
Lina Quackembush
has completed the requirements for
ADULT CPR
sponsored by
NATIONAL CAPITAL CHAPTER

Date completed
06-20-96

Norm R. Hyatt

Chairman, American Red Cross

Instructor's Signature

Mindy Quastler

Holder's Signature

John C. Quinn

The American Red Cross recognizes this training as valid
for three years from completion date. Cert. 653207 (Jan. 1993)



Norm R. Hyatt

Chairman, American Red Cross

Instructor's Signature

Mindy Quastler

Holder's Signature

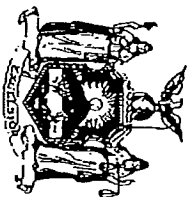
John C. Quinn

The American Red Cross recognizes this training as valid
for one year from completion date. Cert. 653212 (Jan. 1993)



NEW YORK STATE DEPARTMENT OF HEALTH

BARBARA A. DEBUONO, M.D., M.P.H. Commissioner



Expires 12:01 AM April 1, 1997
 ISSUED April 1, 1996
 REVISED July 24, 1996

INTERIM CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State
 Lab ID No. : 10602
 Director: MR. JEFFREY CURRAN

Lab Name: IEA INC
 Address : 200 MONROE TURNPIKE
 MONROE CT 06468

is hereby APPROVED as an Environmental Laboratory for the category

ENVIRONMENTAL ANALYSES NON POTABLE WATER

All approved subcategories and/or analytes are listed below:

or Hydrocarbon Pesticides :	Wastewater Miscellaneous :	Wastewater Metals III :	Mineral :
9,4'-DDD	Bromide	Cobalt, Total	Alkalinity
4,4'-DDT	Boron, Total	Molybdenum, Total	Chloride
4,4'-DDT	Cyanide, Total	Iron, Total	Fluoride, Total
alpha-BHC	Color	Nitrite, Total	Sulfate (as SO4)
Aldrin	Phenols	Thallium, Total	Hardness, Total
Beta-BHC	Oil & Grease Total Recoverable	Nutrient :	Acrolein and Acrylonitrile (ALL)
Chlorane Total	Hydrogen Ion (pH)	Ket/dahl Nitrogen, Total	Benzidines (ALL)
delta-BHC	Specific Conductance	Ammonia (as N)	Chlorophenoxy Acid Pesticides (ALL)
Dieldrin	Sulfide (as S)	Nitrite (as N)	Chlorinated Hydrocarbons (ALL)
Endrin aldehyde	Surfactant (NBAS)	Orthophosphate (as P)	Demand (ALL)
Endrin	Organic Carbon, Total	Phosphorus, Total	Halocethers (ALL)
Endosulfan I	Wastewater Metals I (ALL)	Wastewater Metals II (ALL)	Nitroaromatics and Isoparone (ALL)
Endosulfan II	Nitrosamines (ALL)	Organophosphate Pesticides (ALL)	Polynuclear Aromatics (ALL)
Endosulfan sulfate	Polychlorinated Biphenyls (ALL)	Phthalate Esters (ALL)	Priority Polutant Phenols (ALL)
Heptachlor	Furcable Aromatics (ALL)	Furcable Halocarbons (ALL)	Residue (ALL)
Heptachlor epoxide	TCF Additional Compounds (ALL)		
Lindane			
Methoxychlor			
Toxaphene			

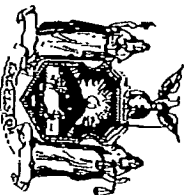
Serial No. 033046

Wadsworth Center

Property of the New York State Department of Health. Valid only at the address shown.
 Must be conspicuously posted. Valid certificate has a red serial number.

NEW YORK STATE DEPARTMENT OF HEALTH

BARBARA A. DEBUONO, M.D., M.P.H. Commissioner



Expires 12:01 AM April 1, 1997
ISSUED April 1, 1996
REVISED July 24, 1996

INTERIM CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Lab ID No. : 10602 *Issued in accordance with and pursuant to section 502 Public Health Law of New York State*

Director: MR. JEFFREY CURRAN

Lab Name: IEA INC

Address : 200 MONROE TURNPIKE
MONROE CT 06468

is hereby APPROVED as an Environmental Laboratory for the category

ENVIRONMENTAL ANALYSES / POTABLE WATER

All approved subcategories and/or analytes are listed below:

Drinking Water Non-Metals :	Drinking Water Trihaloethane (All)	Drinking Water Metals I (All)	Volatile Aromatics (All)
Alkalinity			
Calcium Hardness			
Chloride			
Color			
Corrosivity			
Fluoride, Total			
Nitrate (as N)			
Hydrogen Ion (pH)			
Solids, Total Dissolved			
Sulfate (as SO4)			

Serial No.: 033047

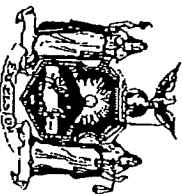
Wadsworth Center

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NEW YORK STATE DEPARTMENT OF HEALTH

BARBARA A. DEBUONO, M.D., M.P.H. Commissioner



Expires 12:01 AM April 1, 1997
ISSUED April 1, 1996
REVISED July 24, 1996

INTERIM CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Lab ID No. : 10602 *Issued in accordance with and pursuant to section 502 Public Health Law of New York State*

Director: MR. JEFFREY CURRAN

Lab Name: IEA INC

Address : 200 MONROE TURNPIKE
MONROE CT 06468

is hereby APPROVED as an Environmental Laboratory for the category

ENVIRONMENTAL ANALYSES/AIR AND EMISSIONS

All approved subcategories and/or analytes are listed below:

Flammable Aromatics (All)

Purgeable Halocarbons (All)

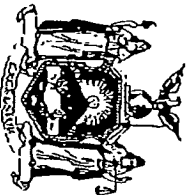
Serial No.: 033048

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NEW YORK STATE DEPARTMENT OF HEALTH

BARBARA A. DEBUONO, M.D., M.P.H. Commissioner



Expires 12:01 AM April 1, 1997
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Lab ID No. : 10602
Director: MR. JEFFREY CURRAN
Lab Name: IEA INC
Address : 200 MONROE TURNPIKE
MONROE CT 06468

is hereby APPROVED as an Environmental Laboratory for the category

ENVIRONMENTAL ANALYSES/SOLID AND HAZARDOUS WASTE

All approved subcategories and/or analytes are listed below:

---Microbiologic Testing :	Miscellaneous :
Corrosivity	Cyanide, Total
Ignitability	Hydrogen Ion (pH)
Reactivity	Sulfide (as S)
ICLP	Organophosphate Pesticides (ALL)
R.P. Toxicity	Phthalate Esters (ALL)
Purgeable Halocarbons (ALL)	
	Acrolein and Acrylonitrile (ALL)
	Chlor. Hydrocarbon Pesticides (ALL)
	Halocethers (ALL)
	Metals II (ALL)
	Polynuclear Arom. Hydrocarbon (ALL)
	Priority Pollutant Phenols (ALL)
	Chlorophenoxy Acid Pesticides (ALL)
	Chlorinated Hydrocarbons (ALL)
	Metals I (ALL)
	Nitroaromatics Isophorone (ALL)
	Polychlorinated Biphenyls (ALL)
	Purgeable Aromatics (ALL)

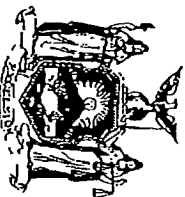
Serial No.: 033049

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NEW YORK STATE DEPARTMENT OF HEALTH

BARBARA A. DEBUONO, M.D., M.P.H. Commissioner



Expires 12:01 AM April 1, 1997
ISSUED April 1, 1996
REVISED July 24, 1996

INTERIM CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State
Lab ID No. : 10602
Director: MR. JEFFREY CURRAN
Lab Name: IEA INC
Address : 200 MONROE TURNPIKE
MONROE CT 06468

is hereby APPROVED as an Environmental Laboratory for the category

CONTRACT LABORATORY PROTOCOL (CLP)

All approved subcategories and/or analytes are listed below:

CLP Inorganics CLP PDB/Pesticides CLP Semi-Volatile Organics CLP Volatile Organics

Serial No.: 033050

Wadsworth Center

Property of the New York State Department of Health. Valid only at the address shown.
Must be conspicuously posted. Valid certificate has a red serial number.



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS — MRD
HTRW MANDATORY CENTER OF EXPERTISE
12565 WEST CENTER OF EXPERTISE
OMAHA, NEBRASKA 68144-3869
June 21, 1996



Hazardous, Toxic and Radioactive Waste
Center of Expertise

IEA, Inc.
200 Monroe Turnpike
Monroe, CT 06468

*Rec'd
07-01-96*

Gentlemen:

This correspondence addresses the recent evaluation of your laboratory by the U.S. Army Corps of Engineers (USACE) for chemical analysis in support of the USACE Hazardous Toxic and Radioactive Waste Program.

IEA, Inc. of Monroe, CT has successfully analyzed audit samples as listed below:

<u>METHOD</u>	<u>PARAMETERS</u>	<u>MATRIX</u>
8260A	Volatile Organics	Water ⁽³⁾
8260A	Volatile Organics	Solids
8270A	Semivolatile Organics	Water ⁽³⁾
8270A	Semivolatile Organics	Solids ⁽³⁾
8081	Organochlorine Pesticides	Water ⁽³⁾
8081	Organochlorine Pesticides	Solids
8081	Polychlorinated Biphenyls	Water ⁽³⁾
8081	Polychlorinated Biphenyls	Solids ⁽³⁾
8151A	Herbicides	Water ⁽³⁾
8151A	Herbicides	Solids
SW-846	TAL Metals ⁽¹⁾	Water ⁽³⁾
SW-846	TAL Metals ⁽¹⁾	Solids ⁽³⁾
413.1	Oil & Grease	Water ⁽³⁾
9071	Oil & Grease	Solids
9060	Total Organic Carbon	Water ⁽³⁾
9010A/9012	Cyanide	Water ⁽³⁾
9013	Cyanide	Solids
300 series	Anions ⁽²⁾	Water ⁽³⁾
Mod 8015	Total Petroleum Hydrocarbons	Water

Mod 8015 Total Petroleum Hydrocarbons Solids

- Remarks: 1) TML Metals: Aluminum, antimony, arsenic, barium, beryllium, cadmium, calcium, chromium, cobalt, copper, iron, lead, magnesium, manganese, mercury, nickel, potassium, selenium, silver, sodium, thallium, vanadium, and zinc.
- 2) Anions: Chloride, fluoride, sulfate, nitrate, nitrite, ortho-phosphate.
- 3) The laboratory has successfully analyzed a performance evaluation sample for this method/matrix.
- 4) 'Solids' includes soils, sediments, and solid waste.

Based on the successful analysis of the audit samples indicated in the table in Paragraph 2 above, IEA, Inc. of Monroe, CT is validated for sample analysis by the methods listed above. A full validation of 18 months was approved by the USACE Contract Laboratory Evaluation Committee on June 14, 1996.

The expiration date of validation is December 14, 1997. The Chemistry Branch of the Hazardous, Toxic, and Radioactive Waste Center of Expertise may schedule and conduct an on-site audit at any time during the 18 month validation period to evaluate lab performance if deemed necessary. USACE reserves the right to suspend validation status for any or all of the listed parameters if deemed necessary. It should be noted that your laboratory may not subcontract USACE analytical work to any other laboratory location without the approval of this office. This laboratory validation does not guarantee the delivery of any samples from a USACE Contracting Officer.

If you have any questions or comments, please contact Ms. Elena Webster at (402) 697-2574.

Sincerely,



Marcia C. Davies, Ph.D.
Director, USACE Hazardous,
Toxic and Radioactive Waste
Center of Expertise



New York State Department of Environmental Conservation

MEMORANDUM

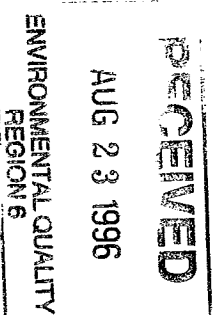
TO: Darrell Sweredoski, RHWRE, NYSDEC Region 6 & Christine McGrath, ISS - BCS
FROM: Lech Dolata, Central Field Services Section, BCS
SUBJECT: Site No. 6-45-013, North Lawrence Oil Dump Site
DATE: AUG 20 1996

Attached is the revised copy of Sampling & Analysis Plan forwarded by the apparent low bidder.

Please review the attached and let me have your comments as soon as possible.

Attachment

Mike Cox:
Please review + comment
to Lech Dolata.

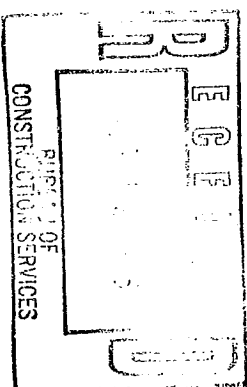


✓ 9-9-96
mm. CFP
8-31-96



IEM SEALAND CORPORATION

7921 Jones Branch Drive, Third Floor
McLean, VA 22102
Tel. 703-448-6665 • Fax 703-448-7347



August 16, 1996

New York State Department of Environmental Conservation
Bureau of Construction Services
Division of Hazardous Waste Remediation
50 Wolf Road
Albany, New York 12233-7010

Attn: James Van Hoesen, P.E.
Chief-Central Field Services Section

RE: Site No. 6-45-013
North Lawrence Oil Dump Site
St. Lawrence County

SUBJECT: Review Comments from the Sampling and Analysis Plan

Dear Mr. Van Hoesen:

Enclosed are six (6) copies of the finalized version of the Sampling and Analysis Plan. A single copy was transmitted to Mr. Glen Daukas of ABB Environmental Services, Inc.

Clarifications/revisions made to the Plan are addressed as follows utilizing the same numbering system as your correspondence dated May 21, 1996.

Sampling and Analysis Plan

12. See attached cross reference table and Table 4-2.
13. The project Quality Assurance Officer is addressed in Section 1.1.2, page 1.
14. See Work Plan.
15. See Section 2.5.
16. See Section 2.5.
17. See Section 2.5.



IEM SEALAND CORPORATION

New York State Department of Environmental Conservation
August 16, 1996
Page 2

18. See Section 2.5.
 19. See Section 4.2.
- Deleted Total Organic Halide from list of analytes.
- See Section 4.2.

See Appendix B for a copy of IEA, Inc. NYSDOH ELAP CLP certification.

If you should have any questions concerning this submittal, please do not hesitate to contact either myself or Tony Saatou at (703) 448-6665.

Sincerely,

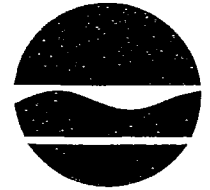
Linda C. Quackenbush
Corporate Compliance Officer

LCQ:drw

w/attachments

b:\disk1\mysdechoesen.ltr

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-7010



Michael D. Zagata
Commissioner

January 18, 1996

Mr. Glenn Daukas
ABB Environmental Services
110 Free Street - P.O. Box 7050
Portland, ME 04112

Dear Mr. Daukas:

RE: North Lawrence Oil Dump
Site No.: 6-45-013
Bid Documents

This is to acknowledge the receipt of the Final Design Documents for the above-referenced site. The NYSDEC has reviewed the documents and found them to be acceptable with the following exception:

- The specifications do not include the 1995 boilerplate that was sent to ABB in May, 1995. It may be necessary to modify the documents (via addendum or revision) prior to bid. The Bureau of Construction Services will direct you on this matter.

Enclosed is one copy of the approval documents for your use.

Sincerely,

P. David Smith
Chief
Remedial Section C
Bureau of Central Remedial Action
Division of Hazardous Waste Remediation

Enclosure

cc: w/enclosure
D. Sweredoski - Region 6 (Watertown)
A. Carlson - NYSDOH
J. VanHoesen

a:glenn-nl.J16

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
 DIVISION OF HAZARDOUS WASTE REMEDIATION
 INSPECTOR'S DAILY REPORT

Site Code No. 645013
 Site Name: North Lawrence Oil Dump Site
 Location: North Lawrence / St. Lawrence Co.
 Engineer: ABB Environmental Services
 Contractor: IEM Sealand Corp.
 Job Phone: (315) 389-5237

Date 7-9-97 I.R. No. 66
 Sheet 1 of 2

	AM	PM
Weather <u>Cloudy Int Rain</u>	<u>K</u>	<u>Int Sun</u>
Temperature <u>50°-75°</u>		
Wind (Dir. & Vel.)		

Health & Safety:

Level of protective clothing used: _____
 Is the level of protection in conformance with the approved Health & Safety Plan?
 Yes ___ No ___ If no, list the deviations under Items of Concern.
 Are atmospheric monitoring results at acceptable levels? Yes ___ No ___
 Attach a copy of the monitoring log. (all intrusive work complete)

Description of work performed during this report period:

- Excavating burying the large pile of stumps (removed from the site) in the area directly NE of the disposal cell.
- Received the latest Treated Material Batch Data, wetlands confirmation sample locations & log, lagoon confirmation sample results, perimeter air monitoring results, proctor curves for solidified waste and unconfined compressive strength results for batches # 55034 and 55035 (38 psi and 31 psi respectively) sample results are below the 50 psi requirement.
- Received the preliminary sample results (PCB's) for the wetland confirmation samples. Multiple results were above the clean up goal of 0.11 ppm (ideal clean up goal).

Site Visitors _____ Representing _____ Entered exclusion zone _____

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
INSPECTOR'S DAILY REPORT

66

Subcontractor A: Depot Flood worked from 7:00 AM to 5:30 PM
Subcontractor B: _____ worked from _____ to _____

Contractors' Equipment	Prime	A	B	Not Used	Work Force			
					Prime	A	B	
<u>See IR #64</u>					<u>See IR #64</u>			

Prime Contractor worked from _____ to _____

Comments: I called DEC tech Delata and informed him of the preliminary sample results of the wetlands confirmation samples and faxed him a copy of the results.
I spoke to ERM/Depot Flood Joe Mahoney. ERM may have ABB perform stability analysis/calculations for the solidified waste material that has been placed in the disposal cell to determine if it is acceptable as is.

Items of concern:

Attachments to this report: Confirmation sample locations & log, treated material batch data, summary of lagoon excavation quantities, lagoon confirmation sample results, and solidified waste TCLP sample results

Inspector's Name (Print): Michael Cox
Inspector's Signature: Michael Cox Date: 7-9-97
Reviewed by: _____ Date: _____

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
INSPECTOR'S DAILY REPORT

Site Code No. 645013
Site Name: North Lawrence Oil Dump Site
Location: North Lawrence / St. Lawrence Co.
Engineer: ABB Environmental Services
Contractor: JEM Sealend Corp
Job Phone: (315) 389-5237

Date 7-21-97 I.R. No. 68
Sheet 1 of 2

	AM	PM
Weather <u>Cloudy</u>	<u>κ</u>	<u>κ</u>
Temperature <u>60-75°</u>	<u>κ</u>	<u>κ</u>
Wind (Dir. & Vel.)	<u>W/SE</u>	

Health & Safety:

Level of protective clothing used: _____
Is the level of protection in conformance with the approved Health & Safety Plan?
Yes ___ No ___ If no, list the deviations under Items of Concern.
Are atmospheric monitoring results at acceptable levels? Yes ___ No ___
Attach a copy of the monitoring log. (all intrusive work complete)

Description of work performed during this report period:

- Crew is placing sand material (gas vent layer) on the disposal cell to increase the top slope grades, the top was less than the 4% min. grade required, they are raising the grade per ABB John Nadeau
- The lagoon area and wetlands area have some grass growth
- HDPE liner material (60 mil.) for the cap is on site, liner crew is to arrive/place liner this week.
(7) rolls 530' x 22' each Solmax International Inc.
Roll #'s 1002-1, 1003-1, 1004-1, 1005-1, 1006-1, 1007-1 & 1012-1 textured both sides.
- Hazzard trucking continues to haul/stockpile the barrier protection layer material on site.

Site Visitors	Representing	Entered exclusion zone

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
 DIVISION OF HAZARDOUS WASTE REMEDIATION
 INSPECTOR'S DAILY REPORT

68

Subcontractor A: Depot Road worked from 7:00 AM to 5:30[±] PM
 Subcontractor B: _____ worked from _____ to _____

Contractors' Equipment	Prime	A	B	Not Used	Work Force	Prime	A	B
					1- Super. GA/OC		K	
644 JD Loader		K			1- Operator		K	
250 Cat Dump Truck		K			1- Laborer		K	
D5 Bulldozer		K						

Prime Contractor worked from _____ to _____

Comments: ABB John Nadeau informed me:
 1) ABB performed the stability calculations for the solidified waste placed in the disposal cell (4-batches) that failed to meet the required compressive strength (5,000 psi). ABB has determined the placed material is satisfactory, no further action required.
 2) ABB/DEC have approved the HDPE liner submittal for the liner cap crew is to be on site this week.
 3) The wetlands replacement soil (placed in the wetland area) is presently not approved by ABB. They are waiting for additional information from the Cornell Nutrient Analysis Laboratory to determine if the replacement soil is acceptable and/or requires additives to enhance the soil for use in the wetlands.

Attachments to this report: _____

Inspector's Name (Print): Michael Cox
 Inspector's Signature: Michael Cox Date: 7-21-97
 Reviewed by: _____ Date: _____

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
INSPECTOR'S DAILY REPORT

Site Code No. 645013
Site Name: North Lawrence Oil Dump Site
Location: North Lawrence / St. Lawrence Co.
Engineer: ABB Environmental Services
Contractor: IEM Sealand Corp.
Job Phone: (315) 389-5237

Date 7-10-97 I.R. No. 67

Sheet 1 of 2

	AM	PM
Weather <u>Sunny Clear</u>	<u>x</u>	<u>x</u>
Temperature <u>50-80 ±</u>		
Wind (Dir. & Vel.)		

Health & Safety:

Level of protective clothing used: _____
Is the level of protection in conformance with the approved Health & Safety Plan?
Yes ___ No ___ If no, list the deviations under Items of Concern.
Are atmospheric monitoring results at acceptable levels? Yes ___ No ___
Attach a copy of the monitoring log. (all intrusive work complete)

Description of work performed during this report period:

- crew continues to bury the stumps in the area directly NE of the disposal cells.
- Lazer trucking continues to haul/stockpile material ~~to~~ on site for the barrier protection layer

Site Visitors	Representing	Entered exclusion zone

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
INSPECTOR'S DAILY REPORT

67

Subcontractor A: Dept Road worked from 7:00 AM to 5:30 PM
Subcontractor B: _____ worked from _____ to _____

Contractors' Equipment	Prime	A	B	Not Used		Work Force		
						Prime	A	B
<u>See IR # 64</u>						<u>See IR # 64</u>		

Prime Contractor worked from _____ to _____

Comments:

Items of concern: SEM has not received approval from ADQ/DEC for the proposed lined cap material.

Attachments to this report:

Inspector's Name (Print): Michael Cox
Inspector's Signature: Michael Cox Date: 7-10-97
Reviewed by: _____ Date: _____

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
 DIVISION OF HAZARDOUS WASTE REMEDIATION
 INSPECTOR'S DAILY REPORT

Site Code No. 645013
 Site Name: North Lawrence Oil Dump Site
 Location: North Lawrence / St. Lawrence Co.
 Engineer: ABB Environmental Services
 Contractor: ZEM Sealand Corp.
 Job Phone: (315) 389-5237

Date 7-22-97 I.R. No. 69

Sheet 1 of 2

	AM	PM
Weather <u>Sunny, Clear</u>		
Temperature <u>50-80°</u>		
Wind (Dir. & Vel.)		

Health & Safety:

Level of protective clothing used: _____

Is the level of protection in conformance with the approved Health & Safety Plan?

Yes ___ No ___ If no, list the deviations under Items of Concern.

Are atmospheric monitoring results at acceptable levels? Yes ___ No ___

Attach a copy of the monitoring log. *(all intrusive work complete)*

Description of work performed during this report period:

- ABB John Nadeau informed me that the liner crew is on site, but that the submittals approved for the liner is not for the seven rolls of liner at the site. They are trying to get the documentation/submittal information for the seven rolls of liner, they are unable to perform liner work until the roll of liner are approved.
- also John spoke to me about what the contractor is required to perform for restoration of the perimeter areas disturbed by the contractor when they performed the remediation activities at the site. John and I feel that grading and mulching the areas is required as a minimum. We will speak to the contractor about this.
- ABB John Nadeau received/reviewing the 2nd Change Order submittal for the additional material excavated from the lagoon area. He is also reviewing the submitted Payment Requisition # 00000696 dated 6/15/97.

Site Visitors _____ Representing _____ Entered exclusion zone _____

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
 DIVISION OF HAZARDOUS WASTE REMEDIATION
 INSPECTOR'S DAILY REPORT

69

Subcontractor A: Dyost Reed worked from 7:00 AM to 5:30 PM
 Subcontractor B: Solmax International Inc worked from 7:00 AM to 5:30 PM

Contractors' Equipment	Prime	A	B	Not Used		Work Force	Prime	A	B
<u>See IR # 68</u>						<u>See IR # 68</u>			
<u>Truck & liner equipment</u>			<u>x</u>			<u>5 person liner crew</u>			<u>x</u>

Prime Contractor worked from _____ to _____

Comments: Received the groundwater monitoring well installation package from Northern Technical Services, includes three soil boring logs, three monitoring well installation details and three well development logs.
Received the final results of the Wetland Confirmation sample results for PCB's and Mercury, results for PCB's and mercury were above the clean up level. I informed NYSDEC Leah Dolata.

Items of concern:

Attachments to this report: Final results and locations of the Wetland Confirmation sample results for PCB's and Mercury

Inspector's Name (Print): Michael Cox
 Inspector's Signature: Michael Cox Date: 7-22-97
 Reviewed by: _____ Date: _____

N 24° 40' (710' DEL) / 754.67' (MEAS)

WOODED AREA

EXCAVATION CONFIRMATION
SAMPLES

F - Floor
B - Beam
S - Sidewall

*Samples above
Clean by Goal*

SURFACE WATER
CONTAINMENT BERM
(SEE NOTE 5)

WOODED AREA
WETLAND SEDIMENT AND OVERFLOW SOIL
EXCAVATION AREA
(EXCAVATION TO 1 FOOT BELOW GRADE)

WOODED AREA
N 10073.07
E 6499.66

N 10102.96
E 6407.74

N 10103.39
E 6361.23

N 9975.36
E 6344.74

N 8942.58
E 6191.62

N 9940.46
E 6154.28

N 9957.84
E 6497.01

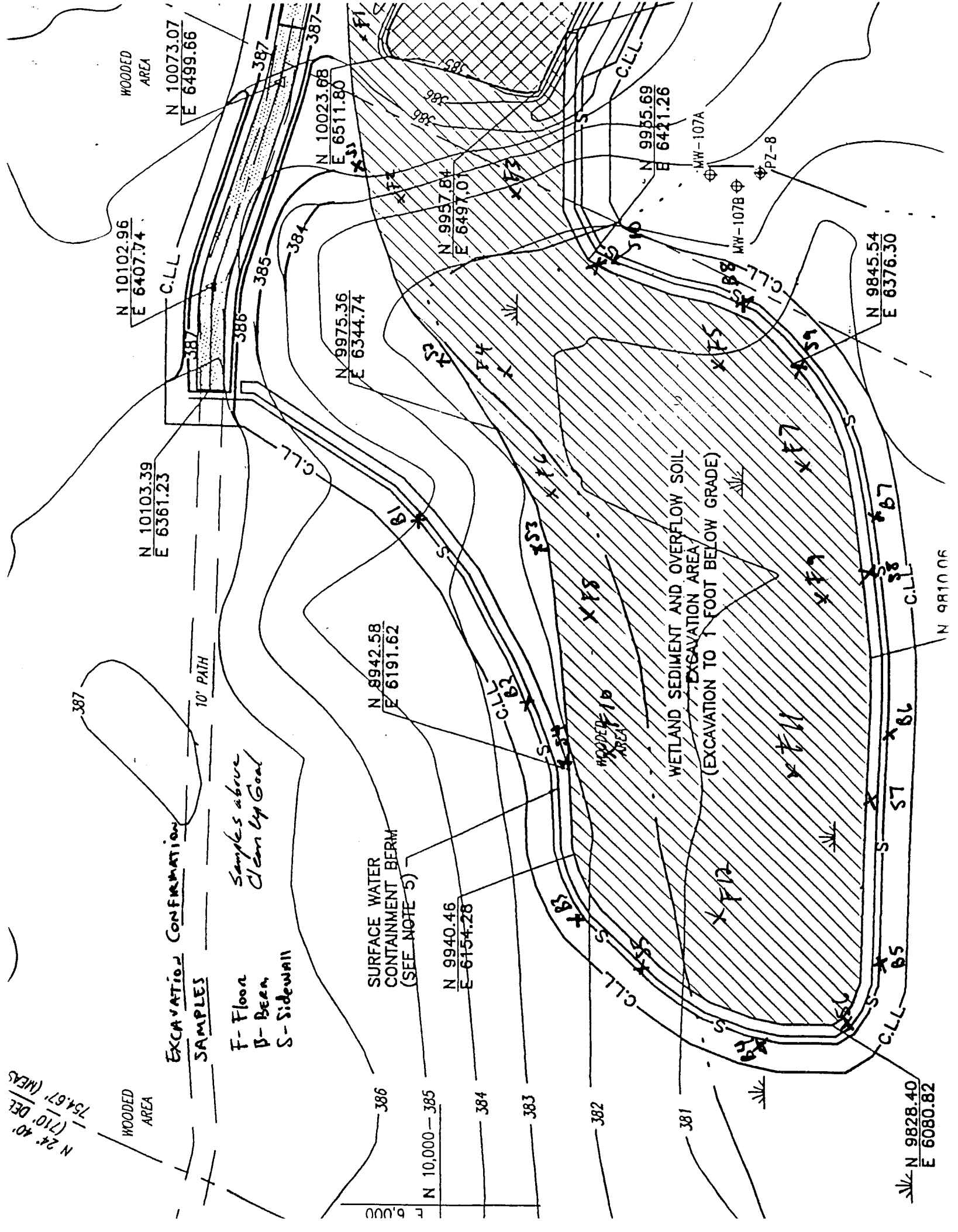
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E 6511.80

N 9955.69
E 6421.26

N 9845.54
E 6376.30

N 9828.40
E 6080.82

N 9810.06



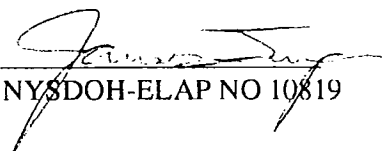
ATLANTIC TESTING LABORATORIES, Limited

ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
 Project : North Lawrence Oil Dump Site
 Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
 Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2924	WECS-S1	PCB	mg/Kg	07/14/97
		Aroclor 1016	<0.08	
		Aroclor 1221	<0.08	
		Aroclor 1232	<0.08	
		Aroclor 1242	<0.08	
		Aroclor 1248	1.2	
		Aroclor 1254	1.5	
		Aroclor 1260	2.1	
		Total PCBs	4.8	
97-2925	WECS-S2	PCB	mg/kg	07/14/97
		Aroclor 1016	<0.08	
		Aroclor 1221	<0.08	
		Aroclor 1232	<0.08	
		Aroclor 1242	<0.08	
		Aroclor 1248	1.2	
		Aroclor 1254	1.6	
		Aroclor 1260	1.9	
		Total PCBs	4.7	

Approved By: 
 NYSDOH-ELAP NO 10819

Date: 07/14/97

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

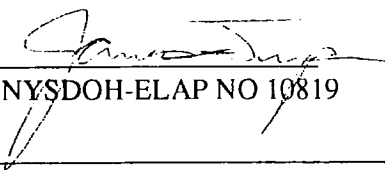
Disclaimer: All sampling services and analytical procedures are performed in accordance with recognized analytical methodologies. The full extent of any and all liability for actual and consequential damages shall be limited to reperformance or cost of said work. ATL is not liable for data interpretation by others.

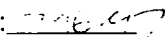
ATLANTIC TESTING LABORATORIES, Limited
 ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
 Project : North Lawrence Oil Dump Site
 Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
 Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2926	WECS-S3	PCB	mg/Kg	07/14/97
		Aroclor 1016	<0.07	
		Aroclor 1221	<0.07	
		Aroclor 1232	<0.07	
		Aroclor 1242	<0.07	
		Aroclor 1248	0.45	
		Aroclor 1254	0.44	
		Aroclor 1260	0.50	
		Total PCBs	1.4	
97-2927	WECS-S4	PCB	mg/kg	07/14/97
		Aroclor 1016	<0.08	
		Aroclor 1221	<0.08	
		Aroclor 1232	<0.08	
		Aroclor 1242	<0.08	
		Aroclor 1248	<0.08	
		Aroclor 1254	<0.08	
		Aroclor 1260	<0.08	
		Total PCBs	<0.08	

Approved By: 
 NYSDOH-ELAP NO 10819

Date: 

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

ATLANTIC TESTING LABORATORIES, Limited
 ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
 Project : North Lawrence Oil Dump Site
 Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
 Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2928	WECS-S5	PCB	mg/Kg	07/14/97
		Aroclor 1016	<0.07	
		Aroclor 1221	<0.07	
		Aroclor 1232	<0.07	
		Aroclor 1242	<0.07	
		Aroclor 1248	<0.07	
		Aroclor 1254	<0.07	
		Aroclor 1260	<0.07	
		Total PCBs	<0.07	
97-2929	WECS-S6	PCB	mg/kg	07/14/97
		Aroclor 1016	<0.06	
		Aroclor 1221	<0.06	
		Aroclor 1232	<0.06	
		Aroclor 1242	<0.06	
		Aroclor 1248	<0.06	
		Aroclor 1254	<0.06	
		Aroclor 1260	<0.06	
		Total PCBs	<0.06	

Approved By:
 NYSDOH-ELAP NO 10819

Date: 7/16/97

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

Disclaimer: All sampling services and analytical procedures are performed in accordance with recognized analytical methodologies. The full extent of any and all liability for actual and consequential damages shall be limited to reperformance or cost of said work. ATL is not liable for data interpretation by others.

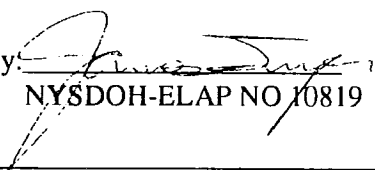
ATLANTIC TESTING LABORATORIES, Limited

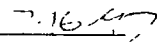
ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
Project : North Lawrence Oil Dump Site
Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2930	WECS-S7	PCB	mg/Kg	07/14/97
		Aroclor 1016	<0.06	
		Aroclor 1221	<0.06	
		Aroclor 1232	<0.06	
		Aroclor 1242	<0.06	
		Aroclor 1248	<0.06	
		Aroclor 1254	<0.06	
		Aroclor 1260	<0.06	
		Total PCBs	<0.06	
97-2931	WECS-S8	PCB	mg/kg	07/14/97
		Aroclor 1016	<0.07	
		Aroclor 1221	<0.07	
		Aroclor 1232	<0.07	
		Aroclor 1242	<0.07	
		Aroclor 1248	<0.07	
		Aroclor 1254	<0.07	
		Aroclor 1260	<0.07	
		Total PCBs	<0.07	

Approved By: 
NYSDOH-ELAP NO 10819

Date: 

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

Disclaimer: All sampling services and analytical procedures are performed in accordance with recognized analytical methodologies. The full extent of any and all liability for actual and consequential damages shall be limited to reperformance or cost of said work. ATL is not liable for data interpretation by others.

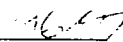
ATLANTIC TESTING LABORATORIES, Limited
 ENVIRONMENTAL LABORATORY

- Client : IEM Sealand Corporation
 Project : North Lawrence Oil Dump Site
 Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
 Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2932	WECS-S9	PCB	mg/Kg	07/15/97
		Aroclor 1016	<0.02	
		Aroclor 1221	<0.02	
		Aroclor 1232	<0.02	
		Aroclor 1242	<0.02	
		Aroclor 1248	<0.02	
		Aroclor 1254	0.58	
		Aroclor 1260	0.47	
		Total PCBs	1.0	
97-2933	WECS-S10	PCB	mg/kg	07/15/97
		Aroclor 1016	<0.08	
		Aroclor 1221	<0.08	
		Aroclor 1232	<0.08	
		Aroclor 1242	<0.08	
		Aroclor 1248	1.4	
		Aroclor 1254	2.2	
		Aroclor 1260	3.5	
		Total PCBs	7.1	

Approved By: 
 NYSDOH-ELAP NO. 10819

Date: 

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

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ATLANTIC TESTING LABORATORIES, Limited

ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
Project : North Lawrence Oil Dump Site
Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2934	WECS-F1	PCB	mg/Kg	07/15/97
		Aroclor 1016	<0.06	
		Aroclor 1221	<0.06	
		Aroclor 1232	<0.06	
		Aroclor 1242	<0.06	
		Aroclor 1248	<0.06	
		Aroclor 1254	0.11	
		Aroclor 1260	0.14	
		Total PCBs	0.25	
97-2935	WECS-F2	PCB	mg/kg	07/15/97
		Aroclor 1016	<0.06	
		Aroclor 1221	<0.06	
		Aroclor 1232	<0.06	
		Aroclor 1242	<0.06	
		Aroclor 1248	2.4	
		Aroclor 1254	1.6	
		Aroclor 1260	1.8	
		Total PCBs	5.8	

Approved By: 
NYSDOH-ELAP NO 10819

Date: 7/16/97

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

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ATLANTIC TESTING LABORATORIES, Limited

ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
Project : North Lawrence Oil Dump Site
Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2936	WECS-F3	PCB	mg/Kg	07/15/97
		Aroclor 1016	<0.06	
		Aroclor 1221	<0.06	
		Aroclor 1232	<0.06	
		Aroclor 1242	<0.06	
		Aroclor 1248	<0.06	
		Aroclor 1254	<0.06	
		Aroclor 1260	0.18	
		Total PCBs	0.18	
97-2937	WECS-F4	PCB	mg/kg	07/16/97
		Aroclor 1016	<0.07	
		Aroclor 1221	<0.07	
		Aroclor 1232	<0.07	
		Aroclor 1242	<0.07	
		Aroclor 1248	2.7	
		Aroclor 1254	2.7	
		Aroclor 1260	2.6	
		Total PCBs	8.0	

Approved By: 
NYSDOH-ELAP NO. 10819

Date: 7/16/97

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

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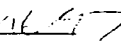
ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
Project : North Lawrence Oil Dump Site
Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2938	WECS-F5	PCB	mg/Kg	07/15/97
		Aroclor 1016	<0.09	
		Aroclor 1221	<0.09	
		Aroclor 1232	<0.09	
		Aroclor 1242	<0.09	
		Aroclor 1248	0.75	
		Aroclor 1254	0.59	
		Aroclor 1260	0.78	
		Total PCBs	2.1	
97-2939	WECS-F6	PCB	mg/kg	07/15/97
		Aroclor 1016	<0.08	
		Aroclor 1221	<0.08	
		Aroclor 1232	<0.08	
		Aroclor 1242	<0.08	
		Aroclor 1248	1.9	
		Aroclor 1254	1.6	
		Aroclor 1260	1.6	
		Total PCBs	5.1	

Approved By: 
NYSDOH-ELAP NO 10819

Date: 

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

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ATLANTIC TESTING LABORATORIES, Limited

ENVIRONMENTAL LABORATORY

- Client : IEM Sealand Corporation
Project : North Lawrence Oil Dump Site
Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2940	WECS-F7	PCB	mg/Kg	07/02/97
		Aroclor 1016	<0.07	
		Aroclor 1221	<0.07	
		Aroclor 1232	<0.07	
		Aroclor 1242	<0.07	
		Aroclor 1248	<0.07	
		Aroclor 1254	<0.07	
		Aroclor 1260	<0.07	
		Total PCBs	<0.07	
97-2941	WECS-F8	PCB	mg/kg	07/16/97
		Aroclor 1016	<0.2	
		Aroclor 1221	<0.2	
		Aroclor 1232	<0.2	
		Aroclor 1242	<0.2	
		Aroclor 1248	2.3	
		Aroclor 1254	3.2	
		Aroclor 1260	3.8	
		Total PCBs	9.3	

Approved By: 
NYSDOH-ELAP NO 10819

Date: 7-16-97

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

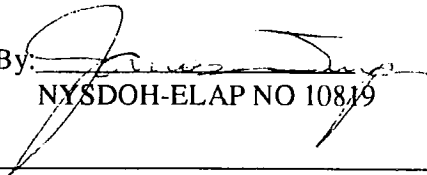
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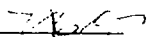
ATLANTIC TESTING LABORATORIES, Limited
ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
Project : North Lawrence Oil Dump Site
Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2942	WECS-F9	PCB	mg/Kg	07/02/97
		Aroclor 1016	<0.07	
		Aroclor 1221	<0.07	
		Aroclor 1232	<0.07	
		Aroclor 1242	<0.07	
		Aroclor 1248	<0.07	
		Aroclor 1254	<0.07	
		Aroclor 1260	<0.07	
		Total PCBs	<0.07	
97-2943	WECS-F10	PCB	mg/kg	07/16/97
		Aroclor 1016	<0.08	
		Aroclor 1221	<0.08	
		Aroclor 1232	<0.08	
		Aroclor 1242	<0.08	
		Aroclor 1248	0.18	
		Aroclor 1254	0.20	
		Aroclor 1260	0.22	
		Total PCBs	0.60	

Approved By: 
NYSDOH-ELAP NO 10819

Date: 

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected


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ATLANTIC TESTING LABORATORIES, Limited
 ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
 Project : North Lawrence Oil Dump Site
 Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
 Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2944	WECS-F11	PCB	mg/Kg	07/03/97
		Aroclor 1016	<0.07	
		Aroclor 1221	<0.07	
		Aroclor 1232	<0.07	
		Aroclor 1242	<0.07	
		Aroclor 1248	<0.07	
		Aroclor 1254	<0.07	
		Aroclor 1260	<0.07	
		Total PCBs	<0.07	
97-2945	WECS-F12	PCB	mg/kg	07/16/97
		Aroclor 1016	<0.08	
		Aroclor 1221	<0.08	
		Aroclor 1232	<0.08	
		Aroclor 1242	<0.08	
		Aroclor 1248	0.27	
		Aroclor 1254	0.12	
		Aroclor 1260	0.16	
		Total PCBs	0.55	

Approved By: 
 NYSDOH-ELAP NO 10819

Date: 7/16/97

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

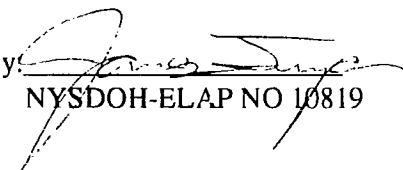
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ATLANTIC TESTING LABORATORIES, Limited
 ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
 Project : North Lawrence Oil Dump Site
 Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
 Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2946	WECS-B1	PCB	mg/Kg	07/03/97
		Aroclor 1016	<0.06	
		Aroclor 1221	<0.06	
		Aroclor 1232	<0.06	
		Aroclor 1242	<0.06	
		Aroclor 1248	<0.06	
		Aroclor 1254	<0.06	
		Aroclor 1260	<0.06	
		Total PCBs	<0.06	
97-2947	WECS-B2	PCB	mg/kg	07/03/97
		Aroclor 1016	<0.06	
		Aroclor 1221	<0.06	
		Aroclor 1232	<0.06	
		Aroclor 1242	<0.06	
		Aroclor 1248	<0.06	
		Aroclor 1254	<0.06	
		Aroclor 1260	<0.06	
		Total PCBs	<0.06	

Approved By: 
 NYSDOH-ELAP NO 10819

Date: 7/16/97

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

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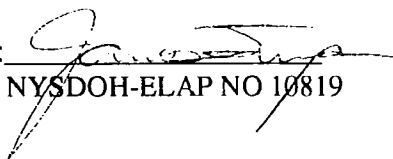
ATLANTIC TESTING LABORATORIES, Limited

ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
 Project : North Lawrence Oil Dump Site
 Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
 Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2948	WECS-B3	PCB	mg/Kg	07/03/97
		Aroclor 1016	<0.07	
		Aroclor 1221	<0.07	
		Aroclor 1232	<0.07	
		Aroclor 1242	<0.07	
		Aroclor 1248	<0.07	
		Aroclor 1254	<0.07	
		Aroclor 1260	<0.07	
		Total PCBs	<0.07	
97-2949	WECS-B4	PCB	mg/kg	07/03/97
		Aroclor 1016	<0.07	
		Aroclor 1221	<0.07	
		Aroclor 1232	<0.07	
		Aroclor 1242	<0.07	
		Aroclor 1248	<0.07	
		Aroclor 1254	<0.07	
		Aroclor 1260	<0.07	
		Total PCBs	<0.07	

Approved By: 
 NYSDOH-ELAP NO 10819

Date: 7/16/97

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected


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ATLANTIC TESTING LABORATORIES, Limited
 ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
 Project : North Lawrence Oil Dump Site
 Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
 Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2950	WECS-B5	PCB	mg/Kg	07/03/97
		Aroclor 1016	<0.07	
		Aroclor 1221	<0.07	
		Aroclor 1232	<0.07	
		Aroclor 1242	<0.07	
		Aroclor 1248	<0.07	
		Aroclor 1254	<0.07	
		Aroclor 1260	<0.07	
		Total PCBs	<0.07	
97-2951	WECS-B6	PCB	mg/kg	07/03/97
		Aroclor 1016	<0.07	
		Aroclor 1221	<0.07	
		Aroclor 1232	<0.07	
		Aroclor 1242	<0.07	
		Aroclor 1248	<0.07	
		Aroclor 1254	<0.07	
		Aroclor 1260	<0.07	
		Total PCBs	<0.07	

Approved By: 
 NYSDOH-ELAP NO 10819

Date: 7/26/97

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

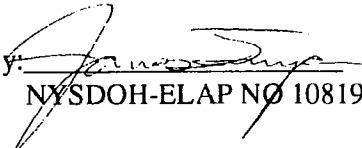
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ATLANTIC TESTING LABORATORIES, Limited
 ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
 Project : North Lawrence Oil Dump Site
 Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
 Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Results</u>	<u>Date Analyzed</u>
97-2952	WECS-B7	PCB	mg/Kg	07/03/97
		Aroclor 1016	<0.06	
		Aroclor 1221	<0.06	
		Aroclor 1232	<0.06	
		Aroclor 1242	<0.06	
		Aroclor 1248	<0.06	
		Aroclor 1254	<0.06	
		Aroclor 1260	<0.06	
		Total PCBs	<0.06	
97-2953	WECS-B8	PCB	mg/kg	07/03/97
		Aroclor 1016	<0.06	
		Aroclor 1221	<0.06	
		Aroclor 1232	<0.06	
		Aroclor 1242	<0.06	
		Aroclor 1248	<0.06	
		Aroclor 1254	<0.06	
		Aroclor 1260	<0.06	
		Total PCBs	<0.06	

Approved By: 
 NYSDOH-ELAP NO 10819

Date: 7/16/97

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

Disclaimer: All sampling services and analytical procedures are performed in accordance with recognized analytical methodologies. The full extent of any and all liability for actual and consequential damages shall be limited to reperformance or cost of said work. ATL is not liable for data interpretation by others.

ATLANTIC TESTING LABORATORIES, Limited
ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
 Project : North Lawrence Oil Dump Site
 Date Sampled : 06/18/97

ATL Job No. : ELCT1344-62097
 Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Result mg/Kg</u>	<u>Date Analyzed</u>
97-2924	WECS-S1	Mercury	<0.2	07/10/97
97-2925	WECS-S2	Mercury	0.28	07/11/97
97-2926	WECS-S3	Mercury	<0.1	07/10/97
97-2927	WECS-S4	Mercury	<0.2	07/10/97
97-2928	WECS-S5	Mercury	<0.1	07/10/97
97-2929	WECS-S6	Mercury	<0.1	07/10/97
97-2930	WECS-S7	Mercury	<0.1	07/10/97
97-2931	WECS-S8	Mercury	<0.1	07/10/97
97-2932	WECS-S9	Mercury	0.22	07/11/97
97-2933	WECS-S10	Mercury	<0.1	07/11/97
97-2934	WECS-F1	Mercury	<0.1	07/10/97
97-2935	WECS-F2	Mercury	<0.1	07/10/97
97-2936	WECS-F3	Mercury	<0.1	07/10/97
97-2937	WECS-F4	Mercury	<0.1	07/11/97
97-2938	WECS-F5	Mercury	<0.2	07/10/97

Approved By:
 NYSDOH-ELAP NO 10819

Date: 7/14/97

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

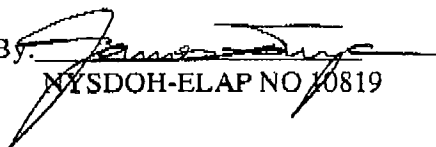
Disclaimer: All sampling services and analytical procedures are performed in accordance with recognized analytical methodologies. The full extent of any and all liability for actual and consequential damages shall be limited to reperformance or cost of said work. ATL is not liable for data interpretation by others.

ATLANTIC TESTING LABORATORIES, Limited
ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
 Project : North Lawrence Oil Dump Site
 Date Sampled. : 06/18/97

ATL Job No. : ELCT1344-62097
 Date Received : 06/20/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Result mg/Kg</u>	<u>Date Analyzed</u>
97-2939	WECS-F6	Mercury	<0.2	07/10/97
97-2940	WECS-F7	Mercury	<0.1	07/10/97
97-2941	WECS-F8	Mercury	<0.3	07/10/97
97-2942	WECS-F9	Mercury	<0.2	07/10/97
97-2943	WECS-F10	Mercury	<0.1	07/10/97
97-2944	WECS-F11	Mercury	<0.1	07/10/97
97-2945	WECS-F12	Mercury	<0.2	07/10/97
97-2946	WECS-B1	Mercury	<0.1	07/10/97
97-2947	WECS-B2	Mercury	<0.1	07/10/97
97-2948	WECS-B3	Mercury	<0.1	07/10/97
97-2949	WECS-B4	Mercury	<0.1	07/10/97
97-2950	WECS-B5	Mercury	<0.1	07/10/97
97-2951	WECS-B6	Mercury	<0.1	07/10/97
97-2952	WECS-B7	Mercury	<0.1	07/10/97
97-2953	WECS-B8	Mercury	<0.1	07/10/97

Approved By: 
 NYSDOH-ELAP NO 10819

Date: 7/14/97

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

Disclaimer: All sampling services and analytical procedures are performed in accordance with recognized analytical methodologies. The full extent of any and all liability for actual and consequential damages shall be limited to reperformance or cost of said work. ATL is not liable for data interpretation by others.

ATLANTIC TESTING LABORATORIES, Limited

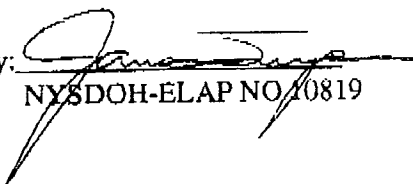
ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
 Project : North Lawrence Oil Dump Site
 Date Sampled : 06/26/97

ATL Job No. : ELCT1344-7797-1
 Date Received : 07/07/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Result mg/L</u>	<u>Date Analyzed</u>
97-3254	SS35A	TCLP Lead	<0.2	07/09/97

*TCLP Sample Result
 for solidified waste
 (re-sampled) m.c.g.*

Approved By: 
 NYSDOH-ELAP NO 10819

Date: 7/9/97

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

Disclaimer: All sampling services and analytical procedures are performed in accordance with recognized analytical methodologies. The full extent of any and all liability for actual and consequential damages shall be limited to reperformance or cost of said work. ATL is not liable for data interpretation by others.

*m.c.g.
 7-22-97*

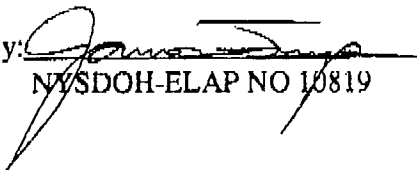
ATLANTIC TESTING LABORATORIES, Limited
ENVIRONMENTAL LABORATORY

Client : IEM Sealand Corporation
 Project : North Lawrence Oil Dump Site
 Date Sampled : 06/26/97

ATL Job No. : ELCT1344-7797-2
 Date Received : 07/07/97

<u>ATL Lab I.D.</u>	<u>Client Sample I.D.</u>	<u>Parameter</u>	<u>Result mg/L</u>	<u>Date Analyzed</u>
97-3255	SS-Carbon	TCLP Lead	<0.2	07/09/97

*TCLP Sample Result
 for the spent carbon/vessels
 placed in the disposal cell.
 m.c.p.*

Approved By: 
 NYSDOH-ELAP NO 10819

Date: 7/9/97

<	Less Than	mg	milligram	NA	Not Applicable
>	Greater Than	µg	microgram	NS	Not Specified
		Kg	kilogram	ND	Not Detected

Disclaimer: All sampling services and analytical procedures are performed in accordance with recognized analytical methodologies. The full extent of any and all liability for actual and consequential damages shall be limited to reperformance or cost of said work. ATL is not liable for data interpretation by others.

*m.c.p.
 7-22-97*

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
 DIVISION OF HAZARDOUS WASTE REMEDIATION
 INSPECTOR'S DAILY REPORT

Site Code No. 645013
 Site Name: North Lawrence Oil Dump Site
 Location: North Lawrence / St. Lawrence Co.
 Engineer: ABB Environmental Services
 Contractor: IEM Sealand Corp.
 Job Phone: (315) 389-5237

Date 7-23-97 I.R. No. 70

Sheet 1 of 2

	AM	PM
Weather <u>Sunny Part. Cloudy</u>		
Temperature <u>55-80°±</u>		
Wind (Dir. & Vel.) <u>At. Wind</u>		

Health & Safety:

Level of protective clothing used: _____
 Is the level of protection in conformance with the approved Health & Safety Plan?
 Yes ___ No ___ If no, list the deviations under Items of Concern.
 Are atmospheric monitoring results at acceptable levels? Yes ___ No ___
 Attach a copy of the monitoring log. *(all intrusive work complete)*

Description of work performed during this report period:

- IEM/ABB received the submittals/documentation for the seven rolls of liner at the site. Approved for placement.
- Solmax liner crew is installing the liner on the disposal cell, Solmax QC is performing testing of the liner. Also liner samples are being collected for 3rd party testing.
- Lazer trucking continues to deliver / stockpile barrier protection material for placement on the disposal cell.
- Repairs were made to the ruts in the lay over area (bulldozer tracked walked the area) it is satisfactory

Site Visitors _____ Representing _____ Entered exclusion zone _____

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
INSPECTOR'S DAILY REPORT

70

Subcontractor A: Depot Road worked from 7:00 AM to 5:30⁺ PM
Subcontractor B: Solmax International Inc. worked from 7:00 AM to 5:30⁺ PM

Contractors' Equipment	Prime	A	B	Not Used		Work Force	Prime	A	B
<u>See IR # 68</u>						<u>See IR # 68</u>			
<u>Truck & liner equipment - generators, seaming/welding</u>			<u>K</u>			<u>5 person liner crew</u>			<u>K</u>

Prime Contractor worked from _____ to _____

Comments:

Items of concern:

Attachments to this report:

Inspector's Name (Print): Michael Cox
Inspector's Signature: Michael Cox Date: 7-23-97
Reviewed by: _____ Date: _____

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
INSPECTOR'S DAILY REPORT

Site Code No. 645013
Site Name: North Lawrence Oil Dump Site
Location: North Lawrence / St. Lawrence Co.
Engineer: ABB Environmental Services
Contractor: IEH Sealand Corp.
Job Phone: (315) 389-5237

Date 7-24-97 I.R. No. 71
Sheet 1 of 2

	AM	PM
Weather <u>Sunny, Part Cloudy</u>		
Temperature <u>55-80°</u>		
Wind (Dir. & Vel.) <u>At Wind</u>		

Health & Safety:

Level of protective clothing used: _____
Is the level of protection in conformance with the approved Health & Safety Plan?
Yes ___ No ___ If no, list the deviations under Items of Concern.
Are atmospheric monitoring results at acceptable levels? Yes ___ No ___
Attach a copy of the monitoring log. (all intrusive work complete)

Description of work performed during this report period:

- Solmax crew is completing the installation of the liner/cap installing the boots on the (4) gas vents, welding/seaming liner on the disposal cell.
- Installing the (4) gas vents
- Placing gravel (1') on the site access road.
- Lezare trucking hauling sand & gravel material to the site for the 30" barrier protection layer and access road.

Site Visitors	Representing	Entered exclusion zone

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
 DIVISION OF HAZARDOUS WASTE REMEDIATION
 INSPECTOR'S DAILY REPORT

71

Subcontractor A: Deget Flood worked from 7:00 AM to 12:00 pm[±]
 Subcontractor B: Solmax International worked from 7:00 AM to 12:00 pm[±]

Contractors' Equipment	Prime	A	B	Not Used		Work Force	Prime	A	B
<u>See IR # 68</u>						<u>See IR # 68</u>			
<u>truck & liner equipment - generators, seaming/welding</u>			<input checked="" type="checkbox"/>			<u>5 person liner crew</u>			<input checked="" type="checkbox"/>

Prime Contractor worked from _____ to _____

Comments: ABB John Nabern informed me that he rejected IEM's payment requisition # 00000686 dated 6/15/97 due to IEM has not revised the requisition per NYS DEC's (Leck Dolata) request D date needs to be revised to the current date
2) item number 1 15% of the mobilization costs need to be removed. Contract allows for payment of 70% of mobilization on site the remaining 30% would be payed upon demobilization from the site. This current request is for 85% (15% above) of the
Items of concern: mobilization item which is not appropriate at this time.

Attachments to this report:

Inspector's Name (Print): Michael Cox
 Inspector's Signature: Michael Cox Date: 7-24-97
 Reviewed by: _____ Date: _____

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
 DIVISION OF HAZARDOUS WASTE REMEDIATION
 INSPECTOR'S DAILY REPORT

Site Code No. 645013
 Site Name: North Lawrence Oil Dump Site
 Location: North Lawrence / St. Lawrence Co.
 Engineer: ABB Environmental Services
 Contractor: IEM Sealand Corp.
 Job Phone: (315) 389-5237

Date 7-28-97 I.R. No. 72Sheet 1 of 2

	AM	PM
Weather	<u>Cloudy, Int. Lt. Rain</u>	
Temperature	<u>65-80°</u>	
Wind (Dir. & Vel.)	<u>Windy</u>	

Health & Safety:

Level of protective clothing used: _____

Is the level of protection in conformance with the approved Health & Safety Plan?

Yes ___ No ___ If no, list the deviations under Items of Concern.

Are atmospheric monitoring results at acceptable levels? Yes ___ No ___

Attach a copy of the monitoring log.

(all intrusive work complete)Description of work performed during this report period:

- Lease trucking hauled barrier protection material to the site over the weekend. Hauling material to the site today.
- D5 bulldozer is broken down this morning, repaired in the afternoon and another bulldozer delivered to the site.
- I faxed DEC Tech Dolata a copy of the final confirmation sample results taken in the Wetlands for PCB's & Mercury. Tech requested IEM/Dept flood get an explanation from the Lab (ATL) regarding why the sample results (PCB's) were different (final vs preliminary) (by two times the concentrations reported).
- I spoke to IEM/Dept flood Joe Mahoney about the above. Joe stated he would speak to the Lab (ATL) about getting an explanation regarding the final vs preliminary results. Also Joe asked if I would speak to DEC Tech Dolata about the NYSDEC Category A Level QA/QC documentation per the Specs. Section 01460 Sampling & Analysis 1.03 Description. The Lab (ATL) performed analysis per EPA SW-846 and has questions regarding the Category A documentation. (see page 2)

Site Visitors

Representing

Entered exclusion zone

72

Subcontractor A: Depot Road worked from 7:00 AM to 5:30^{PM}
 Subcontractor B: _____ worked from _____ to _____

Contractors' Equipment	Prime	A	B	Not Used	Work Force	Prime	A	B
1-644 JD loader		x			1- Super QA/OC		x	
1-150 Cat Dump Truck		x			4- Operators		x	
1-D5 Bulldozer		x						
1-D3 Bulldozer		x						

Prime Contractor worked from _____ to _____

Comments: I called DEC Tech Dolata to discuss the Category A documentation. Tech is on vacation all week. I called DEC Christine McGrath and spoke to her about the NYSDEC Category A vs EPA SW-846 analysis/documentation, she and I agreed that she should speak to the contractor JEN/Depot Road Joe Mahoney and the lab (ATL) to resolve the documentation problem/issue regarding the NYSDEC Category A vs EPA SW-846. Christine felt the lab would be able to supply the data to meet the

- Items of concern: NYSDEC Category A requirements:
- Crew is placing the 30" borrow protection layer on the disposal cell liner/cap.
 - Placing the 1' of gravel on the site access roads.
 - Hazare trucking is hauling sand & gravel material to the site.

Attachments to this report: _____

Inspector's Name (Print): Michael Cox
 Inspector's Signature: Michael Cox Date: 7-28-97
 Reviewed by: _____ Date: _____

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
INSPECTOR'S DAILY REPORT

Site Code No. 645013
Site Name: North Lawrence Oil Dump Site
Location: North Lawrence / St. Lawrence Co.
Engineer: ABB Environmental Services
Contractor: IEH Sealand Corp.
Job Phone: (315) 389-5237

Date 7-29-97 I.R. No. 73
Sheet 1 of 2

	AM	PM
Weather	<u>Sunny Part. Cloudy</u>	
Temperature	<u>50-75°</u>	
Wind (Dir. & Vel.)	<u>Windy</u>	

Health & Safety:

Level of protective clothing used: _____
Is the level of protection in conformance with the approved Health & Safety Plan?
Yes ___ No ___ If no, list the deviations under Items of Concern.
Are atmospheric monitoring results at acceptable levels? Yes ___ No ___
Attach a copy of the monitoring log. (all intrusive work complete)

Description of work performed during this report period:

- Crew is placing the 30" barrier protection layer on the disposal cell liner/cap.
- Placing the 1' of gravel on the site access road.

Site Visitors	Representing	Entered exclusion zone

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
INSPECTOR'S DAILY REPORT

73

Subcontractor A: Depot Flood worked from 7:00 AM to 5:30 PM
Subcontractor B: _____ worked from _____ to _____

Contractors' Equipment	Prime	A	B	Not Used		Work Force	Prime	A	B
<u>See IR #72</u>						<u>See IR #72</u>			

Prime Contractor worked from _____ to _____

Comments: ABB John Nadem informed me that IEM/Depot Flood Joe Mahoney revised IEM's payment requisition #00000 696 and resubmitted it for approval/payment.
Also John stated he has reviewed/Commented on IEM's Change Order No. 2 with ABB and DEC Tech Polata regarding payment for the additional work performed at the site - lagoon excavation & solidification of additional waste material.

Items of concern:

Attachments to this report:

Inspector's Name (Print): Michael Cox
Inspector's Signature: Michael Cox Date: 7-29-99
Reviewed by: _____ Date: _____

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
 DIVISION OF HAZARDOUS WASTE REMEDIATION
 INSPECTOR'S DAILY REPORT

Site Code No. 645013
 Site Name: North Lawrence Oil Dump Site
 Location: North Lawrence / St. Lawrence Co.
 Engineer: ABB Environmental Services
 Contractor: IEM Sealand Corp.
 Job Phone: (315) 389-5237

Date 7-30-97 I.R. No. 74Sheet 1 of 2

	AM	PM
Weather <u>Sunny</u>		
Temperature <u>55° F</u>		
Wind (Dir. & Vel.) <u>SE Wind</u>		

Health & Safety:

Level of protective clothing used: _____

Is the level of protection in conformance with the approved Health & Safety Plan?

Yes ___ No ___ If no, list the deviations under Items of Concern.

Are atmospheric monitoring results at acceptable levels? Yes ___ No ___

Attach a copy of the monitoring log. (all intrusive work complete)**Description of work performed during this report period:**

- Crew is placing the 30" service protection layer on the disposal cell liner/cap.
- Placing the 1' of gravel on the site access road.
- Lazare trucking is hauling gravel and topsoil to the site for the access road and 6" topsoil layer on the disposal cell.

Site Visitors

Representing

Entered exclusion zone

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
INSPECTOR'S DAILY REPORT *74*

Subcontractor A: Degroot Road worked from 7:00 AM to 5:30² PM
Subcontractor B: _____ worked from _____ to _____

Contractors' Equipment					Work Force			
	Prime	A	B	Not Used		Prime	A	B
<u>See IR # 72</u>					<u>See IR # 72</u>			

Prime Contractor worked from _____ to _____

Comments:

Items of concern:

Attachments to this report:

Inspector's Name (Print): Michael Cox
Inspector's Signature: Michael Cox Date: 7-30-97
Reviewed by: _____ Date: _____

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
INSPECTOR'S DAILY REPORT

Site Code No. 645013
Site Name: North Lawrence Oil Dump Site
Location: North Lawrence / St. Lawrence Co.
Engineer: ABB Environmental Services
Contractor: IEM Seal and Comp.
Job Phone: (315) 389-5237

Date 7-31-97 I.R. No. 75
Sheet 1 of 2

	AM	PM
Weather <u>Sunny, Clear</u>		
Temperature <u>55-80°</u>		
Wind (Dir. & Vel.) <u>W, 10 mph</u>		

Health & Safety:

Level of protective clothing used: _____
Is the level of protection in conformance with the approved Health & Safety Plan?
Yes ___ No ___ If no, list the deviations under Items of Concern.
Are atmospheric monitoring results at acceptable levels? Yes ___ No ___
Attach a copy of the monitoring log. (all intrusive work complete)

Description of work performed during this report period:

- IEM Joe Mahoney collected four samples of the barrier protection material and one sample of topsoil to perform sieves and proctors per the spec.
- Crew is placing/grading the 30" barrier protection layer on the disposal cell.
- Lazore Trucking is hauling topsoil to the site for the 6" topsoil layer to be placed on the disposal cell.

Site Visitors	Representing	Entered exclusion zone

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
INSPECTOR'S DAILY REPORT

7/5

Subcontractor A: Dyno Rod worked from 7:00 am to 12:00 pm
Subcontractor B: _____ worked from _____ to _____

Contractors' Equipment	Prime	A	B	Not Used	Work Force			
					Prime	A	B	

Prime Contractor worked from _____ to _____
John Nelson

Comments: ABR received/reviewed on 7/24 + 7/25 IEM's corrected and resubmitted Payment Requisition No. 00000696 dated 7/24/97. John sent the requisition to the NYSDOC Tech Dept on 7/25/97.

Items of concern:

Attachments to this report:

Inspector's Name (Print): Michael Cox
Inspector's Signature: Michael Cox Date: 8-4-97
Reviewed by: _____ Date: _____

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
INSPECTOR'S DAILY REPORT

Site Code No. 645013
Site Name: North Lawrence Oil Dump Site
Location: North Lawrence / St. Lawrence Co.
Engineer: ABB Environmental Services
Contractor: IEM Sealand Corp
Job Phone: (315) 389-5237

Date 8-4-97 I.R. No. 76
Sheet 1 of 2

	AM	PM
Weather	<u>Sunny Part. Cloudy</u>	
Temperature	<u>55°-75°</u>	
Wind (Dir. & Vel.)		

Health & Safety:

Level of protective clothing used: _____
Is the level of protection in conformance with the approved Health & Safety Plan?
Yes ___ No ___ If no, list the deviations under Items of Concern.
Are atmospheric monitoring results at acceptable levels? Yes ___ No ___
Attach a copy of the monitoring log.

(all intral. or work complete)

Description of work performed during this report period:

- Bulldozer is grading perimeter areas
- Laborers are placing seed & mulch on the perimeter areas.
- Placing barrier protection paper 30" material on the old corner of the disposal cell. ABB John Nelson informed me that he found the area was 1" low in this area. Contractor had placed only 18" of material.
- Placing 6" topsoil layer on the completed barrier protection paper on the disposal cell.

Site Visitors _____ Representing _____ Entered exclusion zone _____

76

Subcontractor A: Depot Road worked from 7:00 AM to 5:30 PM
Subcontractor B: _____ worked from _____ to _____

Contractors' Equipment	Prime	A	B	Not Used	Work Force	Prime	A	B
1-Cat D5 Bulldozer		x			1- Super QA/QC		x	
1- 644 SD Loader		x			1- operator		x	
1-Cat 250 Dump Truck		x			1- Truck Driver		x	
					3- Laborers		x	

Prime Contractor worked from _____ to _____

Comments:

Items of concern:

Attachments to this report:

Inspector's Name (Print): Michael Cox
Inspector's Signature: Michael Cox Date: 8-4-97
Reviewed by: _____ Date: _____

8-7-97

Site Code No. 645013Date 8-6-97 I.R. No. 77Site Name: North Lawrence Oil Dump SiteSheet 1 of 2Location: North Lawrence / St. Lawrence Co.Engineer: ABB Environmental ServicesContractor: IEEM Sealand Corp.Job Phone: (315) 389-5237

	AM	PM
Weather <u>Sunny Clear</u>	<u>x</u>	<u>x</u>
Temperature <u>50-75°</u>		
Wind (Dir. & Vel.) <u>N.W. Wind</u>		

Health & Safety:

Level of protective clothing used: _____

Is the level of protection in conformance with the approved Health & Safety Plan?

Yes ___ No ___ If no, list the deviations under Items of Concern.

Are atmospheric monitoring results at acceptable levels? Yes ___ No ___

Attach a copy of the monitoring log.

*(all in tree work complete.)*Description of work performed during this report period:

- placing the 6" topsoil layer on the disposal cell.
- placing seed & mulch through out the site.
- IEEM/Dagot Road Tom Mahoney took the (10) post construction samples through out the site area.
- ABB John Nolan informed me that he will complete his oversight activities at the site this week. He will submit a punch list of outstanding items: (see following items)
 1. Silt fence removal
 2. Fix main gate post - (hit by truck)
 3. Fence installation (disposal cell)
 4. Date note (deleted)
 5. Wetland soil submittal (needs approval)
 6. Wetland Seeding
 7. Access road grading
 8. Geotech Test Report (ATK - compaction tests etc.)
 9. Site access graded to drain along the food road (entrance)
 10. Seeding

Site VisitorsRepresentingEntered exclusion zone

11. Post. Construction Samples (10) completed today 8/6
12. Remove cement silo (removed 8/6)
13. Remove pipe & liner (unused materials)
14. Delete coarse aggregate (Field Order) received 8/7
15. Category Level A Data Package (ATK 105)

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS WASTE REMEDIATION
INSPECTOR'S DAILY REPORT

77

Subcontractor A: Depot Road worked from 7:00 AM to 5:30 PM
Subcontractor B: _____ worked from _____ to _____

Contractors' Equipment	Prime	A	B	Not Used	Work Force			
					Prime	A	B	
<u>See IR #76</u>					<u>See IR #76</u>			

Prime Contractor worked from _____ to _____

Comments: Received Field Order Number 2 from ABB John Walden
deleting the coarse aggregate from the site access road.

Items of concern:

Attachments to this report:

Inspector's Name (Print): Michael Cox
Inspector's Signature: Michael Cox Date: 8-7-97
Reviewed by: _____ Date: _____