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September 14, 2007

RECEIVED

Mr. Michael Hinton
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203

SEP 20 2007

CB NYSDEC REG 9
FOIL
✓ REL ___ UNREL

RE: Results of Supplemental Soil Vapor Intrusion Assessment
Hyde Park Facility, Site No. 932036, Town of Niagara, New York

Dear Mr. Hinton:

The purpose of this letter is to provide an addendum to the May 24, 2007 soil vapor intrusion assessment report. In accordance with a NYSDEC request, a single soil vapor sample was collected from location VP-3, on Rhode Island Avenue near Hyde Park Boulevard, on July 26, 2007. A sample was not collected from this location during the initial investigation in March 2007, due to the presence of water in the soil vapor probe implant. The sampling was conducted in conformance with the November 16, 2006 work plan, and in the same manner as the March 2007 sampling event.

SAMPLING AND ANALYSIS

Prior to sampling, the vapor implant at VP-3 was purged and leak tested as described in the work plan. Helium concentrations during the leak test confirmed the integrity of the implant construction and subsequent sample quality.

For quality assurance purposes, a duplicate sample was collected simultaneously with the primary sample at VP-3, using a separate canister. An upwind ambient air sample was also collected, to evaluate background vapor conditions.

Vapor samples were collected via tubing directly into 1.0-liter MC1000SV Minican™ evacuated sampling canisters. Each sample was collected over approximately a one-hour period. The canisters were individually cleaned and certified by the laboratory prior to use. The samples were submitted to a NYSDOH ELAP-certified laboratory (Paradigm, the laboratory used in March 2007), and analyzed via EPA Method TO-15 for TCE, cis-DCE, trans-DCE, DCA and VC.

RESULTS

Analytical data received from the laboratory were validated and reviewed for usability with respect to the requirements in the work plan and the USEPA Region II Standard Operating Procedures (SOPs). All volatile sample results were considered usable following data validation. The data validation report is included as Attachment A.

Results from the July 2007 sampling at VP-3, combined with the previous March 2007

PARSONS

Mr. Michael Hinton
NYSDEC
September 14, 2007
Page 2

results, are presented in Figure 1 and Table 1. The raw data results from the laboratory are provided in Attachment B.

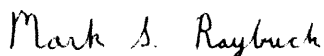
No COPCs were detected in VP-3, in the duplicate sample from this location, or in the ambient air sample (A-1). Considering the March and July 2007 data together, COPCs in all samples were non-detect, with the exception of sample VP-1 (TCE at $4.50 \mu\text{g}/\text{m}^3$) and ambient air sample VA-1 ($1.83 \mu\text{g}/\text{m}^3$ cis-DCE and $1.14 \mu\text{g}/\text{m}^3$ TCE). Both of these samples were located in the northwest corner of the Site. Although a single soil gas-to-indoor air guideline is not available from NYSDOH, the concentration of TCE at VP-1 ($4.50 \mu\text{g}/\text{m}^3$) is below the NYSDOH indoor air concentration guideline of $5 \mu\text{g}/\text{m}^3$ (NYSDOH, 2006). Therefore, even if TCE does not attenuate as expected as it migrates from the subsurface into the indoor air, the measured concentration is less than the indoor air guideline.

PATH FORWARD

The conclusions presented in the May 2007 report remain the same. The results of the SVI assessment do not indicate a potential for soil vapor intrusion from the Site to impact nearby residences. Following concurrence from the NYSDEC on the results of this assessment, the soil vapor implants will be removed and properly abandoned.

If you have any questions regarding this report, please contact Mr. William Barber at (216) 271-8038.

Sincerely,



Mark S. Raybuck
Project Manager

cc: M. Forcucci, NYSDOH
W. Barber, Atlantic Richfield Company
File 442667, No. 9

PARSONS

Mr. Michael Hinton
NYSDEC
September 14, 2007
Page 3

REFERENCES

NYSDOH, 2006. New York State Department of Health, *Guidance for Evaluating Soil Vapor Intrusion in the State of New York*, October 2006.

Parsons, 2006a. Work Plan for Soil Vapor Intrusion Assessment at the Former Carborundum Company – Electric Products Division, Hyde Park Facility (NYSDEC Site No. 932036), November 2006.

Parsons, 2006b. Evaluation of In Situ Treatment Technologies as Remedial Alternatives for Groundwater, November 2006.

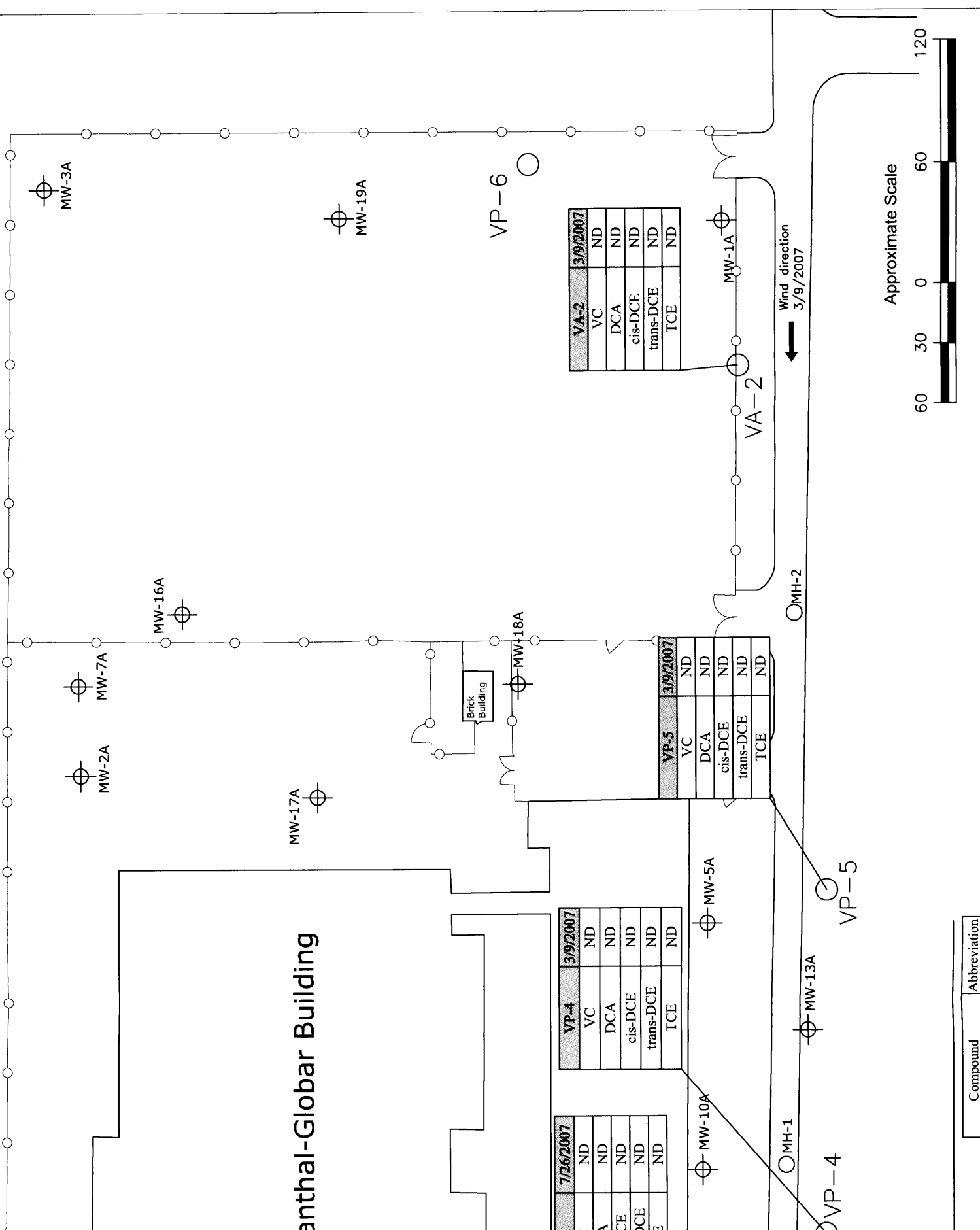
Intera Inc, 2006. Final Summary Report for the 2005 Groundwater Monitoring Program, Former Carborundum Company – Electric Products Division, Hyde Park Facility, Town of Niagara, Niagara County, New York Site No. 932036.

ATTACHMENTS

Attachment A: Data Usability Report
Attachment B: Laboratory Analytical Data

Kanthal-Globar Building

Wind direction
6/2007



Location	Date	VC	DCA	cis-DCE	trans-DCE	TCE
A-1	7/26/2007	ND	ND	ND	ND	ND

Location	Date	VC	DCA	cis-DCE	trans-DCE	TCE
VP-4	3/9/2007	ND	ND	ND	ND	ND

Location	Date	VC	DCA	cis-DCE	trans-DCE	TCE
VP-5	3/9/2007	ND	ND	ND	ND	ND

Location	Date	VC	DCA	cis-DCE	trans-DCE	TCE
VA-2	3/9/2007	ND	ND	ND	ND	ND

Wind direction
3/9/2007

Approximate Scale



Compound	Abbreviation
vinyl chloride	VC
1,1-dichloroethane	DCA

FIGURE 1

TABLE 1

SUMMARY OF ANALYTICAL RESULTS
SOIL VAPOR SAMPLING

Hyde Park Facility Soil Vapor Analytical Results Town of Niagara, NY March and July 2007		Field Location ID: Field Sample ID: Source: Analysis Matrix: Sampled:	VP-1 C-1002 Paradigm TO-15 Vapor 3/8/07	VP-2 C-1022 Paradigm TO-15 Vapor 3/8/07	VP-4 C-1026 Paradigm TO-15 Vapor 3/8/07	VP-5 C-1012 Paradigm TO-15 Vapor 3/9/07	VA-1 C-1007 Paradigm TO-15 Vapor 3/8/07	VA-2 C-1004 Paradigm TO-15 Vapor 3/9/07	VP-3 C-1026 Paradigm TO-15 Vapor 7/26/07	A-1 C-1002 Paradigm TO-15 Vapor 7/26/07
CAS NO.	COMPOUND	UNITS:								
75-01-4	vinyl chloride	ug/m ³	ND	ND	ND	ND	ND	ND	ND	ND
75-35-4	1,1-dichloroethane	ug/m ³	<1.00	<1.00	<1.00	<1.60	<1.00	<1.00	<1.00	<1.00
156-60-5	trans-1,2-dichloroethene	ug/m ³	<1.00	<1.00	<1.00	<1.57	<1.00	<1.00	<1.00	<1.00
156-59-2	cis-1,2-dichloroethene	ug/m ³	<1.00	<1.00	<1.00	<1.57	1.83	<1.00	<1.00	<1.00
79-01-6	trichloroethene	ug/m ³	4.50	ND	ND	<1.000	1.14	<1.000	<1.00	<1.00

Note: VP-1 through VP-5 are soil vapor samples. VA-1, VA-2, and A-1 are ambient outdoor air samples.

ATTACHMENT A

DATA USABILITY REPORT

DATA USABILITY SUMMARY REPORT

HYDE PARK SOIL VAPOR INVESTIGATION

Prepared By:

PARSONS

290 Elwood Davis Road, Suite 312
Liverpool, New York 13088
Phone: (315) 451-9560
Fax: (315) 451-9570

SEPTEMBER 2007

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TABLE OF CONTENTS

SECTION 1 DATA USABILITY SUMMARY	1-1
1.1 LABORATORY DATA PACKAGES	1-1
1.2 SAMPLING AND CHAIN-OF-CUSTODY	1-1
1.3 LABORATORY ANALYTICAL METHODS	1-1
1.3.1 Volatile Organic Analysis	1-2
SECTION 2 DATA VALIDATION REPORTS	2-1
2.1 SOIL VAPOR.....	2-1
2.1.1 Volatiles.....	2-1

LIST OF TABLES

Table 2.1-1 Summary of Sample Analyses and Usability - AIR.....	2-3
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LIST OF ATTACHMENTS

Attachment A - Validated Laboratory Data

SECTION 1

DATA USABILITY SUMMARY

Soil vapor samples were collected at the Hyde Park Site on July 26, 2007. Analytical results from these samples were validated and reviewed by Parsons for usability with respect to the following requirements:

- Work Plan, and
- USEPA Region II Standard Operating Procedures (SOPs).

The analytical laboratory for this project was Paradigm Environmental Services, Inc. (Paradigm).

1.1 LABORATORY DATA PACKAGES

The laboratory data package turnaround time, defined as the time from sample receipt by the laboratory to receipt of the analytical data packages by Parsons, was 16 days on average for the soil vapor samples.

The data packages received from Paradigm were paginated, complete, and overall were of good quality. Comments on specific quality control (QC) and other requirements are discussed in detail in the attached data validation report in Section 2.

1.2 SAMPLING AND CHAIN-OF-CUSTODY

The samples were collected, properly preserved, shipped under a COC record, and received at Paradigm within four days of sampling. All samples were received intact and in good condition at Paradigm.

1.3 LABORATORY ANALYTICAL METHODS

The soil vapor samples were collected from the Site and analyzed for the volatile organic compounds (VOCs) 1,1-dichloroethane, cis-1,2-dichloroethene, trans-1,2-dichloroethene, trichloroethene, and vinyl chloride. Summaries of issues concerning this laboratory analysis are presented in Subsection 1.3.1. The data qualifications resulting from the data validation review and statements on the laboratory analytical precision, accuracy, representativeness, completeness, and comparability (PARCC) are discussed for each analytical method in Section 2. The laboratory data were reviewed and may be qualified with the following validation flags:

- "U" - not detected at the value given,
- "UJ" - estimated and not detected at the value given,
- "J" - estimated at the value given,
- "N" - presumptive evidence at the value given, and
- "R" - unusable value.

The validated laboratory data were tabulated and are presented in Attachment A.

1.3.1 Volatile Organic Analysis

Soil vapor samples collected from the Site were analyzed for certain VOCs using the USEPA TO-15 analytical method. The reported results for the VOC samples did not require qualification as a result of data validation. Therefore, the reported VOC analytical results were 100% complete (i.e., usable) for the data presented by Paradigm. PARCC requirements were met overall.

SECTION 2

DATA VALIDATION REPORT

2.1 SOIL VAPOR

Data review has been completed for data packages generated by Paradigm containing soil vapor samples collected from the Site. The specific samples contained in these data packages, the analyses performed, and a usability summary are presented in Table 2.1-1. All of these samples were properly preserved, shipped under a COC record, and received intact by the analytical laboratory. The validated laboratory data are presented in Attachment A.

Data validation was performed for all samples in accordance with the most current editions of the USEPA Region II SOPs for organic data review. This data validation and usability report is presented by analysis type.

2.1.1 Volatiles

The following items were reviewed for compliancy in the volatile analysis:

- Custody documentation
- Holding times
- Laboratory method blank contamination
- GC/MS instrument performance
- Initial calibrations
- Internal standard area counts and retention times
- Field duplicate precision
- Sample result verification and identification
- Quantitation limits
- Data completeness

These items were considered compliant and acceptable in accordance with the validation protocols. Sample surrogates, matrix spike/matrix spike duplicate precision and accuracy, continuing calibrations, and laboratory control samples were not analyzed. Therefore, these items were not evaluated for this project.

Usability

All volatile sample results were considered usable following data validation.

Summary

The quality assurance objectives for measurement data included considerations for precision, accuracy, representativeness, completeness, and comparability. The volatile data presented by Paradigm were 100% complete (i.e., usable). The validated volatile laboratory data are tabulated and presented in Attachment A.

TABLE 2.1-1

**SUMMARY OF SAMPLE ANALYSES AND USABILITY
HYDE PARK – AIR**

<u>SAMPLE ID</u>	<u>MATRIX</u>	<u>SAMPLE DATE</u>	<u>VOCs</u>
VP-3/C-1026	Air	7/26/07	OK
VP-31/C-1004	Air	7/26/07	OK
A-1/C-1002	Air	7/26/07	OK
TOTAL SAMPLES:			3

NOTES: OK – Sample analysis considered usable and valid.

ATTACHMENT A
VALIDATED LABORATORY DATA

BP Hyde Park SVI Validated Air Analytical Data SDG: 07-2628		Sample ID: Lab Sample Id Source: SDG: Matrix: Sampled: Validated:	VP-3 8940 Paradigm 07-2628 Air 7/26/2007 8/30/2007	VP-31 8941 Paradigm 07-2628 Air 7/26/2007 8/30/2007	A-1 8942 Paradigm 07-2628 Air 7/26/2007 8/30/2007
CAS NO.	COMPOUND	UNITS:			
75-34-3	1,1-Dichloroethane	ug/m3	1 U	1 U	1 U
156-59-2	cis-1,2-Dichloroethene	ug/m3	1 U	1 U	1 U
156-60-5	trans-1,2-Dichloroethene	ug/m3	1 U	1 U	1 U
79-01-6	Trichloroethene	ug/m3	1 U	1 U	1 U
75-01-4	Vinyl Chloride	ug/m3	1 U	1 U	1 U

ATTACHMENT B
LABORATORY ANALYTICAL DATA



Volatile Analysis Report for Air

Client: Parsons

Client Job Site: Hyde Park

Lab Project Number: 07-2628

Lab Sample Number: 8940

Client Job Number: N/A

Field Location: VP-3

Date Sampled: 07/26/2007

Field ID Number: C-1026

Date Received: 07/30/2007

Sample Type: Air

Date Analyzed: 08/07/2007

Halocarbons	PPBv	ug / m3	Halocarbons	PPBv	ug / m3
1,1-Dichloroethane	ND< 0.250	ND< 1.00	Trichloroethene	ND< 0.188	ND< 1.00
cis-1,2-Dichloroethene	ND< 0.255	ND< 1.00	Vinyl Chloride	ND< 0.396	ND< 1.00
trans-1,2-Dichloroethene	ND< 0.255	ND< 1.00			


ELAP Number 10958

Method: EPA TO-15

Data File: A2695.d

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature: _____


Bruce Hoogesteger, Technical Director



PARADIGM

ENVIRONMENTAL SERVICES, INC.

LAB PROJECT NARRATIVE

CLIENT: Parsons
PROJECT LOCATION: Hyde Park
LAB PROJECT ID: 07-2628
REPORT DATE: 8/13/2007

Three air canisters were sampled by the client on 7/26/2007, and received at the Paradigm laboratory on 7/26/2007. The canisters were submitted for site specific volatile analyte testing by EPA Method TO-15.

The canisters were received with varying levels of vacuum, indicating different available volumes for analysis. For all three samples, sufficient volume was available to achieve the project reporting limit target of 1ug/m³. Sample results and canister and method QC were reported to project limit of 1ug/m³. QC canister/regulator blanks and method blanks were free from analytes of concern at any reportable level.

The enclosed data package provides summary results for all samples and QC, chromatograms, and quantitation reports for all runs, including initial calibration, mass spectra for reported analytes, calibration summary reports, tune reports, run condition reports, run logs, and a standard certification report.



PARADIGM

ENVIRONMENTAL SERVICES, INC. 3 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Volatile Analysis Report for Air

Client: Parsons

Client Job Site: Hyde Park

Lab Project Number: 07-2628

Lab Sample Number: 8941

Client Job Number: N/A

Field Location: VP-31

Date Sampled: 07/26/2007

Field ID Number: C-1004

Date Received: 07/30/2007

Sample Type: Air

Date Analyzed: 08/07/2007

Halocarbons	PPBv	ug / m3	Halocarbons	PPBv	ug / m3
1,1-Dichloroethane	ND< 0.250	ND< 1.00	Trichloroethene	ND< 0.188	ND< 1.00
cis-1,2-Dichloroethene	ND< 0.255	ND< 1.00	Vinyl Chloride	ND< 0.396	ND< 1.00
trans-1,2-Dichloroethene	ND< 0.255	ND< 1.00			

ELAP Number 10958

Method: EPA TO-15

Data File: A2696.d

Comments: ND denotes Non Detect

PPBv = Parts per Billion volume

ug / m3 - Microgram per cubic meter.

Signature: _____


Bruce Hoogesteger, Technical Director



Volatile Analysis Report for Air

Client: Parsons

Client Job Site: Hyde Park

Lab Project Number: 07-2628

Lab Sample Number: 8942

Client Job Number: N/A

Field Location: A-1

Date Sampled: 07/26/2007

Field ID Number: C-1002

Date Received: 07/30/2007

Sample Type: Air

Date Analyzed: 08/07/2007

Halocarbons	PPBv	ug / m3	Halocarbons	PPBv	ug / m3
1,1-Dichloroethane	ND< 0.250	ND< 1.00	Trichloroethene	ND< 0.188	ND< 1.00
cis-1,2-Dichloroethene	ND< 0.255	ND< 1.00	Vinyl Chloride	ND< 0.396	ND< 1.00
trans-1,2-Dichloroethene	ND< 0.255	ND< 1.00			

ELAP Number 10958

Method: EPA TO-15

Data File: A2697.d

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature: _____

Bruce Hoogesteger, Technical Director



PARADIGM

ENVIRONMENTAL SERVICES, INC. 3 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Volatile Analysis Report for Air

Client: **Parsons**

Client Job Site: Hyde Park

Lab Project Number: 07-2628

Lab Sample Number: Method Blank

Client Job Number: N/A

Field Location: N/A

Date Sampled: N/A

Field ID Number: N/A

Date Received: N/A

Sample Type: Air

Date Analyzed: 08/07/2007

Halocarbons	PPBv	ug / m3	Halocarbons	PPBv	ug / m3
1,1-Dichloroethane	ND< 0.250	ND< 1.00	Trichloroethene	ND< 0.188	ND< 1.00
cis-1,2-Dichloroethene	ND< 0.255	ND< 1.00	Vinyl Chloride	ND< 0.396	ND< 1.00
trans-1,2-Dichloroethene	ND< 0.255	ND< 1.00			

ELAP Number 10958

Method: EPA TO-15

Data File: A2693a.d

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature: _____

Bruce Hoogesteger: Technical Director



PARADIGM

ENVIRONMENTAL SERVICES, INC. 3 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Volatile Analysis Report for Air

Client: Parsons

Client Job Site: Hyde Park
Client Job Number: N/A
Field Location: Can Blank
Field ID Number: C-1026 / R-506
Sample Type: Air

Lab Project Number: 07-2628
Lab Sample Number: N/A
Date Sampled: N/A
Date Received: N/A
Date Analyzed: 07/18/2007

Halocarbons	PPBv	ug / m3	Halocarbons	PPBv	ug / m3
1,1-Dichloroethane	ND< 0.250	ND< 1.00	Trichloroethene	ND< 0.188	ND< 1.00
cis-1,2-Dichloroethene	ND< 0.255	ND< 1.00	Vinyl Chloride	ND< 0.396	ND< 1.00
trans-1,2-Dichloroethene	ND< 0.255	ND< 1.00			

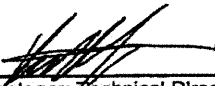
ELAP Number 10958

Method: EPA TO-15

Data File: A2663.d

Comments: ND denotes Non Detect
PPBv = Parts per Billion volume
ug / m3 - Microgram per cubic meter.

Signature: _____


Bruce Hoogesteger, Technical Director



Volatile Analysis Report for Air

Client: Parsons

Client Job Site:	Hyde Park	Lab Project Number:	07-2628
Client Job Number:	N/A	Lab Sample Number:	N/A
Field Location:	Can Blank	Date Sampled:	N/A
Field ID Number:	C-1004 / R-514	Date Received:	N/A
Sample Type:	Air	Date Analyzed:	07/18/2007

Halocarbons	PPBv	ug / m3	Halocarbons	PPBv	ug / m3
1,1-Dichloroethane	ND< 0.250	ND< 1.00	Trichloroethene	ND< 0.188	ND< 1.00
cis-1,2-Dichloroethene	ND< 0.255	ND< 1.00	Vinyl Chloride	ND< 0.396	ND< 1.00
trans-1,2-Dichloroethene	ND< 0.255	ND< 1.00			

ELAP Number 10958

Method: EPA TO-15

Data File: A2658.d

Comments: ND denotes Non Detect
 PPBv = Parts per Billion volume
 ug / m3 - Microgram per cubic meter.

Signature: _____


Bruce Hoogesteger, Technical Director



Volatile Analysis Report for Air

Client: **Parsons**

Client Job Site:	Hyde Park	Lab Project Number:	07-2628
Client Job Number:	N/A	Lab Sample Number:	N/A
Field Location:	Can Blank	Date Sampled:	N/A
Field ID Number:	C-1002 / R-516	Date Received:	N/A
Sample Type:	Air	Date Analyzed:	07/18/2007

Halocarbons	PPBv	ug / m3	Halocarbons	PPBv	ug / m3
1,1-Dichloroethane	ND< 0.250	ND< 1.00	Trichloroethene	ND< 0.188	ND< 1.00
cis-1,2-Dichloroethene	ND< 0.255	ND< 1.00	Vinyl Chloride	ND< 0.396	ND< 1.00
trans-1,2-Dichloroethene	ND< 0.255	ND< 1.00			

ELAP Number 10958

Method: EPA TO-15

Data File: A2659.d

Comments: ND denotes Non Detect
 PPBv = Parts per Billion volume
 ug / m3 - Microgram per cubic meter.

Signature: 
 Bruce Hoogesteger, Technical Director

PARADIGM ENVIRONMENTAL SERVICES, INC.

179 Lake Avenue
Rochester, NY 14608
(585) 647-2530 • (800) 724-1997
FAX: (585) 647-3311

CHAIN OF CUSTODY

REPORT TO: **INVOICETO:**

COMPANY: **Parsons** COMPANY: CLIENT PROJECT #:

ADDRESS: **40 La Riviere Dr Suite 306** ADDRESS: LAB PROJECT #:

CITY: **Buffalo** STATE: **NY** ZIP: **14202** CITY: STATE: ZIP: TURNAROUND TIME: (WORKING DAYS)

PHONE: **716-541-0750** PHONE: FAX: 1 2 3 5 STD OTHER

ATTN: **Schwartz (716) 523-8293** ATTN: QUOTE #:

COMMENTS: **Hyde Park 442607 TCE DCE VC PCA**

REQUESTED ANALYSIS

DATE	TIME	COMPOSITE	GRAAB	SAMPLE LOCATION/FIELD ID	MATRIX	CONTAINER NUMBERS	REMARKS	PARADIGM LAB SAMPLE NUMBER
1		✓		C-1000 VP-6 VP-3 N/A	Varied	5-21		
2		✓		C-1000 + VP-6 + VP-21	Varied	✓		
3		✓		AI -	Varied	✓		
4								
5	7/26			C-1026 VP-3		✓		
6	7/26			C-1004 VP-31		✓		
7				C-1002 AI		✓		
8								
9								
10								

****LAB USE ONLY BELOW THIS LINE****

Sample Condition: Per NELAC/ELAP 210/241/242/243/244


Receipt Parameter NELAC Compliance


Comments: Container Type: Y N

Comments: Preservation: Y N

Comments: Holding Time: Y N

Comments: Temperature: Y N

Sampled By:  Date/Time: **7/26/07 1645** Total Cost:

Relinquished By:  Date/Time: P.I.F.

Received By: _____ Date/Time: _____

Received @ Lab By: _____ Date/Time: _____

TO-15 Sampling Equipment Tracking Form

Date: 7/18/07
 Client: Passco
 Phone Number: 766-580-4379

Match #1 Canister Number to
 #1 Regulator Number

TO-15 Canister Number	Return Condition
1 C-1004 VP-31	good
2 C-1002 A-4	↓
3 C-1006 VP-3	
4	
5	
6	
7	
8	

Shipping inHg	Starting inHg	Ending inHg	Returned inHg
	30	10	10
	30	4	4
	30	9	10

Flow Regulator Number	Return Condition
1 A-57-1	good
2 A-57-6	↓
3 A-57-6	
4	
5	
6	
7	
8	

Additional Equipment
1-gauge
2-gauge
attached
Returned

Comments
Canister cap and flow control fitting must be removed prior to use.

Shipping and Returned inHg to be filled out by lab. Starting and Ending inHg to be filled out by client.
 All canisters / regulators / gauges are provided clean and in proper working condition. Any equipment lost or damaged will be charged at replacement cost. All equipment must be returned within one week of delivery.

Expected Return Date: _____
 Lab Signature: [Signature]
 Customer Signature: [Signature]
 Print Name: James W. Schubert

Actual Return Date: 7/27/07
 Lab Signature: [Signature]
 Customer Signature: _____
 Print Name: _____