

Frontier Chemical - Pendleton Site
March 1999

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Semi-Annual Report #4

Frontier Chemical - Pendleton Site
Order on Consent (#B9-0270-89-05)
Pendleton, New York

Prepared by Pendleton PRP Group
March 1999

Frontier Chemical - Pendleton Site
March 1999

Table of Contents
Semi-Annual Report #4
March 1999

Introduction

Background

Discussion

Conclusion

Attachments

Attachment A –Quarry Lake Level Plot versus Time

Attachment B – Niagara County Sewer District #1 Submittals, Niagara County Sewer District
Discharge Permit, and Operation, Maintenance and Monitoring Activities

Attachment C – Frontier Chemical – Pendleton Site; Semi-Annual Ground Water Monitoring
Report; March 1999; Frontier Chemical - Pendleton Site; Town fo Pendleton,
Niagara County, NY, Water Samples Vloume 1 of 3 February 3,4, and 5, 1999.

Attachment D –Field Observation Reports

Introduction

This is the fourth semi-annual report from the Frontier Chemical - Pendleton Site PRP Group (PRP Group) for the Frontier Chemical - Pendleton Site located in Pendleton, New York. This report summarizes the activities performed since September 1998 for Post-Closure Operation, Maintenance, and Monitoring of the Closure Components of the Frontier Chemical-Pendleton Site by the Pendleton PRP Group.

Background

The Frontier Chemical-Pendleton Site is located on Town Line Road in the Town of Pendleton, Niagara County, New York. The total site comprises approximately 22 acres of the 75-acre Frontier Chemical property. Prior to remediation activities, Quarry Lake, a flooded quarry that resulted from the excavation of clay for use in clay brick and tile manufacturing at an on-site facility, occupied 15 acres of the 22-acre site. The remaining 7 acres, identified as the former Process Area, were utilized by Frontier Chemical Waste Process, Inc. (Frontier) when the site was operated as an industrial waste treatment facility from 1958 to 1974. Plating wastes, pickle liquors and other liquid acid wastes from plating and metal finishing industries were treated at the site, with residuals from the waste treatment process being discharged into Quarry Lake. Much of the former Process Area was filled and graded following termination of waste treatment operations.

The site remediation project with remedial designed by O'Brien & Gere Engineers, Inc. and remedial action by Severson Environmental Services, Inc. included the following major components:

1. Dewatering Quarry Lake to allow drying and consolidation of sediments
2. Excavation and relocation of sediments from Quarry Lake after dewatering operations to within the limits of the capped area
3. Excavation and relocation of surface soils, fill or debris to within the limits of the capped area
4. Capping of consolidated sediments, previously dredged materials, and surface soils with a low-permeability cap
5. Installation, in conjunction with a cap, of a low-permeability barrier to ground water flow
6. Construction of a ground water collection trench along the eastern shore of Quarry Lake and the southern portion of the capped area
7. Reconstruction of the berm around Quarry Lake and installation of a new outlet structure
8. Construction of a ground water pumping station consisting of a wet well and dry vault
9. Installation of a ground water pre-treatment system within the dry vault
10. Conveyance of collected and pre-treated ground water to the local Publicly Owned Treatment Works (POTW)
11. Creation of new wetlands at the site
12. Construction of a surface water swale adjacent to the cap access road to direct surface water away from the capped area
13. Installation of piezometers inside and outside the capped area and a standpipe within the ground water collection trench
14. Installation of a chain link fence around the capped area and pump station to limit access.

Frontier Chemical - Pendleton Site
March 1999

Discussion

Post-closure operation, maintenance, and monitoring of the closure components of the Frontier Chemical-Pendleton Site are the responsibility of the Pendleton PRP Group. Operation, maintenance, and monitoring activities performed by the Pendleton PRP Group during this reporting period includes the following five elements:

1. Routine inspection and maintenance of constructed features, including the capped area, ground water collection and conveyance system, surface water runoff facilities, constructed wetlands, access road, perimeter and containment berms, and outlet weir,

Regarding routine inspection and maintenance of constructed features, no site inspections were conducted during this reporting period. Site inspections are normally performed during April and September.

Relocated wetlands inside the perimeter berm will be inspected and reported in the next semiannual report.

The relocated wetlands inside the Quarry Lake levee have elevations of 574 feet for aquatic bed species (Zone A), 575 feet for non-persistent emergent species (Zone B), and 576 feet for persistent emergence species (Zone C). A water elevation chart is included as Attachment A-2. This water level chart shows the history of the lake elevation starting in April 1996 until present.

2. Operation and maintenance of the ground water pre-treatment system, as described in the Pre-Treatment System Operations Plan,

Regarding Operation and maintenance of the ground water pre-treatment system, the monthly submittals to the Niagara County Sewer District #1 detailing analytical and flow data for this reporting period are included in Attachment B. Six months (October 1998 through March 1999) of submittals as shown in Table 2-1 are included with this report.

Table 2-1 Niagara County Sewer District #1 Submittals	
Submittal Date	Sampling Date
October 13, 1998	September 24, 1998
November 5, 1998	October , 1998
December 10, 1998	November 5, 1998
January 6, 1999	December 4, 1998
February 10, 1999	January 8, 1999
March 11, 1999	February 4, 1999

Also included in Attachment B is Table 2-2 which summarizing Operation, Maintenance, and Monitoring Activities for the site during this reporting period.

Frontier Chemical - Pendleton Site
March 1999

3. Performance of a ground water monitoring program to monitor ground water conditions at the site and to verify the inward hydraulic gradient within the capped area,

Regarding performance of a ground water monitoring program, the report "Frontier Chemical - Pendleton Site, Semi-Annual Ground Water Monitoring Report" dated March 1999 is included as Attachment C-2.

4. Evaluation of operation, maintenance, and monitoring activities and identification of proposed changes to the O&M Manual or site procedures and policies which would provide a safer and/or more cost-effective operation, and

Regarding evaluation of operation, maintenance, and monitoring activities and identification of proposed changes, a letter detailing the status of the maintenance work completed in April 1998 is include in Attachment D-1.

5. Recordkeeping

Regarding recordkeeping activities, Ben Brayley who has replaced Jim Reed, maintains site records both at the Site and at Olin's Niagara Falls Plant including daily and weekly logs and charts. Glynn Geotechnical (Jesse Grossman) provides assistance to Ben Brayley and updates O&M documentation. O'Brien & Gere Engineers (Steve Anagnost) provide ground water level measurement, sampling, monitoring, and analytical field and office support. John Burns maintains analytical results and reports to NCSD #1 and NYSDEC from Olin's Charleston Plant. All these records are available for review and inspection upon reasonable notice.

6. Miscellaneous

The PRP Group's discharge permit, #96-11, with the Niagara County Sewer District #1 was renewed during this reporting period. The new discharge permit, #98-11 is included in the attachments. There were no changes in reporting requirements.

Conclusion

The work performed for the Site from September 1998 to March 1999 was reviewed and found to be in accordance with the approved O&M Manual for the Site.

Frontier Chemical - Pendleton Site
March 1999

Attachment A -Quarry Lake Level Plot versus Time

1 Quarry Lake Level - February 2, 1999

Frontier Chemical - Pendleton Site
March 1999

1 Quarry Lake Level - February 2, 1999

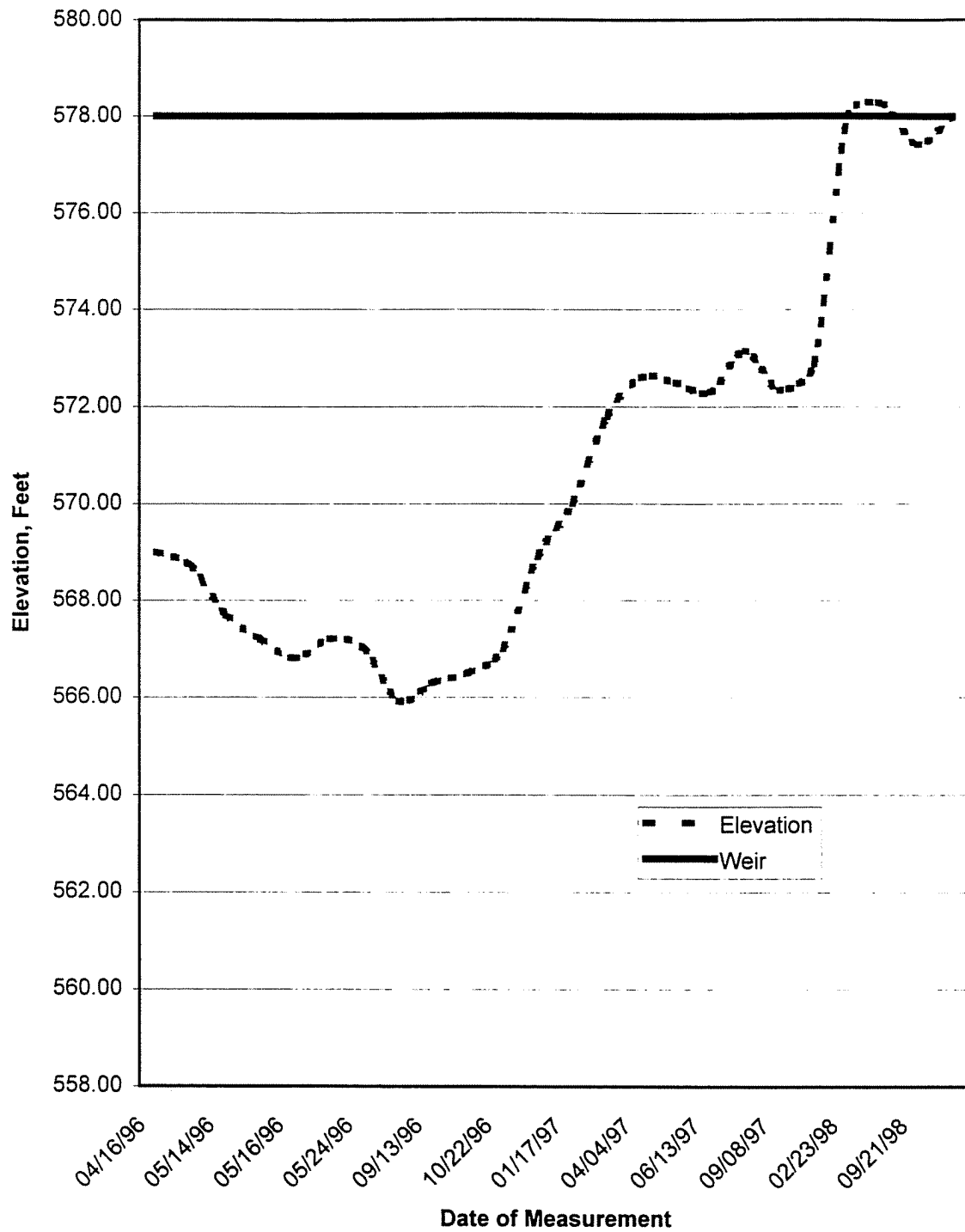
- Table A-1 Quarry Lake Level Plot versus Time
- Chart A-1 Quarry Lake Water Elevationsa

Frontier Chemical - Pendleton Site
March 1999

Table A-1 Frontier Chemical – Pendleton Site Quarry Lake Level Plot versus Time	
Date	Elevation
4/16/96	569.00
5/9/96	568.70
5/14/96	567.70
5/15/96	567.20
5/16/96	566.80
5/21/96	567.20
5/24/96	567.00
8/19/96	565.92
9/13/96	566.30
9/30/96	566.50
10/22/96	567.00
11/13/96	568.90
1/17/97	570.00
3/7/97	571.80
4/4/97	572.60
4/16/97	572.50
6/13/97	572.30
6/24/97	573.15
9/8/97	572.34
10/28/97	572.88
2/23/98	578.00
4/30/98	578.26
9/21/98	577.42
2/4/99	577.97

Frontier Chemical - Pendleton Site
March 1999

Chart A-1
Frontier Chemical - Pendleton Site
Quarry Lake Water Elevations



October 13, 1998

Mr. Frank Nerone
Chief Operator
Niagara County Sewer District #1
7346 Liberty Drive
Niagara Falls, NY 14304

Subject: Analytical Sampling Results (9/24/94 Samples)
Groundwater Discharge Through Pre-Treatment System
Pendleton (Frontier Chemical) Site

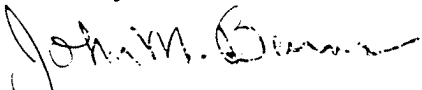
Dear Mr. Nerone:

Enclosed for your review are analytical results from the September 24, 1998, monthly sampling event for discharge of collected groundwater from the pre-treatment system at the Pendleton Site. The sample taken on September 3, 1998 was not picked up by the laboratory and was discarded. Analytical results for this sampling event are compared against the Permit (#96-11) requirements on the attached Analytical Summary and Daily Flow sheets.

A review of the analytical and flow data shows that all permit parameters are significantly below the stated permit requirements.

This data is being provided for your review and concurrence that all permit parameters are well within their limits. If, following review of the enclosed information, you are not in agreement with the above stated conclusion, please contact me at 423-336-4057 as soon as possible so we may discuss any future monitoring requirements.

Sincerely,



John M. Burns
for the Frontier Chemical - Pendleton Site PRP Group

Enclosures: as stated

cc: D. Kummer
Pendleton Site Technical Committee

DAILY FLOW DATA - PENDLETON SITE
SEPTEMBER 1998

DATE	TOTALIZER READING	DAILY FLOW
9/1/98	291268	158 avg.
9/2/98		158 avg.
9/3/98	291583	104
9/4/98	291687	155
9/5/98	291842	104
9/6/98	291946	101
9/7/98	292047	155
9/8/98	292202	104
9/9/98	292306	104
9/10/98	292410	105
9/11/98	292515	122 avg.
9/12/98		122 avg.
9/13/98		122 avg.
9/14/98	292881	102
9/15/98	292983	155
9/16/98	293138	104
9/17/98	293242	156
9/18/98	293398	181 avg.
9/19/98		181 avg.
9/20/98	293759	103
9/21/98	293862	102 avg.
9/22/98	293964	121 avg.
9/23/98		121
9/24/98	294206	104
9/25/98	294310	104
9/26/98	294414	104
9/27/98	294518	158
9/28/98	294676	157
9/29/98	294833	102
9/30/98	294935	

AVERAGE DAILY FLOW IN GALLONS 126

	= DRY VAULT GROUNDWATER RELIEF	
		gallons
		gallons
		gallons
		gallons
TOTAL GALLONS		<u>0</u>

avg =flow between data points divided by days of missing data

avg =(291583-291268)/2 or 158 gallons per day for data between 9/1/98 and 9/3/98

Frontier Chemical - Pendleton Site
Analytical Summary for WS 001
Permit # 96-11
Groundwater Discharge Point: D 002

287 717 Gallons Discharged Prior To 8/5/98
6 489 Gallons Since Last Report
132 Average Daily Flow Based on 49 days Between Samples

Parameters	Permit Limit GPD	Detection Limits	9/24/98 Sample Results GPD
Treatment System Discharge			
Discharge Rate(1)	662		
624 Analytes	ug/L	ug/L	ug/L
Toluene	10.0	1.0	
1,2-Dichloroethane	10.0	1.0	
4-Methyl-2-Pentanone	10.0	5.0	
Vinyl Chloride	10.0	2.0	
Methylene Chloride	10.0	2.8	
trans-1,2-Dichloroethene	10.0	1.0	
1,1,1-Trichloroethane	10.0	1.0	
Trichloroethene	10.0	1.0	
Benzene	10.0	1.0	
Chloromethane		2.0	
Bromomethane		2.0	
Chloroethane		2.0	
Chloroform		1.0	
Carbon Tetrachloride		1.0	
1,1-Dichloroethene		1.0	
Trichlorofluoromethane		2.0	
1,1-Dichloroethane		1.0	
1,2-Dichloropropane		1.0	
Bromodichloromethane		1.0	
2-Chloroethylvinyl ether		2.0	
cis-1,3-Dichloropropene		1.0	
trans-1,3-Dichloropropene		1.0	
1,1,2-Trichloroethane		1.0	
Tetrachloroethene		1.2	
Dibromochloromethane		1.0	
Chlorobenzene		1.0	
Ethylbenzene		1.0	
Bromoform		1.0	
1,1,2,2-Tetrachloroethane		1.0	
1,3-Dichlorobenzene		1.0	
1,4-Dichlorobenzene		1.0	
1,2-Dichlorobenzene		1.0	
Sum of 624 Analytes		100.0	0.0
608 Pesticides(2)	ug/L	ug/L	ug/L
alpha BHC	10.0	0.003	
beta BHC	20.0	0.006	
delta BHC	10.0	0.010	
gamma BHC	10.0	0.003	
Heptachlor	8.0	0.022	
Aldrin	8.0	0.018	
Heptachlor Epoxide	9.0	0.009	
4,4-DDE	20.0	0.005	
Methoxychlor	18.0	0.007	
Metals	mg/L	mg/L	mg/L
Antimony	0.1	0.009	< 0.009
Boron	4.00	0.012	0.826
Chromium	5.33	0.005	0.007
Cyanide(T)	2.0	0.005	< 0.005
Other	mg/L	mg/L	mg/L
Total Phenolics	NA	0.005	< 0.005
TSS	300	4.000	< 4.000

Legend:

- (1) Permit limit @ 662 GPD with maximum daily discharged @ 2500 GPD
(2) Discontinue per April 14, 1997 Letter from F. Narrone to PRP Group
(a) Detected in blank
NA Not applicable
(*) Resampled date due to laboratory not picking up sample taken on 9/3/98

WASTE STREAM TECHNOLOGY, INC.

302 Grote Street
Buffalo, NY 14207
(716) 876-5290

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OCT 5 1998

JOHN BURNS

Analytical Data Report

Report Date : 09/29/98

Group Numbers : 9801-1290, 1309

Prepared For :

Mr. John Burns

Olin Corporation

P.O. Box 248

1186 Lower River Road NW

Charleston, TN 37310

Site : Frontier Chemical - Pendelton

Field and Laboratory Information

Client Id	WST Lab #	Matrix	Date Sampled	Date Received	Time
GAC II	WS45593	Aqueous	9/3/98	9/22/98	1300
GAC II	WS45647	Aqueous	9/24/98	9/25/98	1155
Trip Blank	WS45648	Aqueous	9/24/98	9/25/98	1155
Sample Status Upon Receipt : No irregularities.					

Analytical Services**Analytical Parameters****Number of Samples****Turnaround Time**

624	2	Standard
Metals	1	Standard
Cyanide	1	Standard
Phenol	1	Standard
Total Suspended Solids	1	Standard

Report Released By : Daniel W. Vollmer
Daniel Vollmer, Laboratory QA/QC Officer

ENVIRONMENTAL LABORATORY ACCREDITATION CERTIFICATION NUMBERS

NYSDOH ELAP #11179 NJDEPE #73977 CDHS ELAP #2189

**WASTE STREAM
TECHNOLOGY**

METHODOLOGIES

The specific methodologies employed in obtaining the analytical data reported are indicated on each of the result forms. The method numbers shown refer to the following U.S. Environmental Protection Agency Reference:

Methods for Chemical Analysis of Water and Wastes. EPA 600/4-79-020, March 1979, Revised 1983, U.S. Environmental Monitoring and Support Laboratory, Cincinnati, Ohio 45268.

Federal Register, 40 CFR Part 136: Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act. Revised July 1992.

Test Methods for Evaluating Solid Waste: Physical/Chemical Methods. Third Edition, Revised December 1996, U.S. EPA SW-846.

Annual Book of ASTM Standards, Volume II. ASTM, 100 Harbor Drive, West Conshohocken, PA 19428-2959.

Standard Methods for the Examination of Water and Wastewater. (18th Edition). American Public Health Association, 1105 18th Street, NW, Washington, D.C. 20036.

ORGANIC DATA QUALIFIERS

- U - Indicates compound was analyzed for but not detected.
- J - Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed, or when the mass spectral data indicates the presence of a compound that meets identification criteria, but the result is less than the sample quantitation limit but greater than zero.
- C - This flag applies to pesticide results where the identification has been confirmed by GC/MS.
- B - This flag is used when the analyte is found in the associated blank as well as the sample.
- E - This flag identifies all compounds whose concentrations exceed the calibration range of the GC/MS instrument of that specific analysis.
- D - This flag identifies all compounds identified in an analysis at a secondary dilution factor.
- G - Matrix spike recovery is greater than the expected upper limit of analytical performance.
- L - Matrix spike recovery is less than the expected lower limit of analytical performance.
- # - Indicates that a surrogate recovery was found to be outside the expected limits of analytical performance.
- \$ - Indicates that the surrogate compound was diluted out. The sample had to be diluted to obtain analytical results and a recovery could not be calculated.
- (%) - Indicates that the compound is a surrogate and that the value reported for this compound is in percent recovery. The quality control recovery limits (QC Limits) are indicated in the detection limit column.

Waste Stream Technology, Inc.
Wet Chemistry Result Report

Site : Frontier Chemical - Pendelton
Date Sampled : 9/03/98
Date Received : 9/22/98
Client ID : GAC II
Lab ID: WS45593

Group Number : 9801-1290
Matrix : Aqueous

Parameter	Units	Detection Limit	Result	Analysis Date	Analysis Method
Phenol	mg/l	0.005	< 0.005	9/25/98	EPA 420.1

Waste Stream Technology, Inc.
Metals Analysis Result Report

Site : Frontier Chemical - Pendelton
Date Sampled : 9/03/98
Date Received : 9/22/98

Group Number: 9801-1290
Report Units : mg/L
Matrix : Aqueous

	Lab ID Number	WS45593		
	Client ID	GAC II		
	Date Digested	9/29/98		
Analyte	Detection Limit	Result	Date Analyzed	Analysis Method
Boron by ICP	0.012	0.826	9/29/98	EPA 200.7
Antimony by GFAA	0.009	< 0.009	9/29/98	EPA 200.9
Chromium by ICP	0.005	0.007	9/29/98	EPA 200.7

Waste Stream Technology, Inc.
Wet Chemistry Result Report

Site : Frontier Chemical - Pendelton
Date Sampled : 9/24/98
Date Received : 9/25/98
Client ID : GAC II
Lab ID: WS45647

Group Number : 9801-1309
Matrix : Aqueous

Parameter	Units	Detection Limit	Result	Analysis Date	Analysis Method
TSS	mg/L	4.0	< 4.0	9/28/98	EPA 160.2
Cyanide	mg/L	0.005	< 0.005	9/29/98	EPA 335.2

Waste Stream Technology, Inc
Volatile Organics Analysis
40 CFR 136 Method 624

Site : Frontier Chemical - Pendelton
Date Sampled : 9/24/98
Date Received : 9/25/98

Group Number : 9801-1309
Report Units : ug/L
Matrix : Aqueous

	WST Lab ID Client ID Analysis Date	WS45647 GAC II 9/29/98	
Compound	Detection Limit/ QC Limits (%)	Result	Q
chloromethane	2.0	2.0	U
bromomethane	2.0	2.0	U
vinyl chloride	2.0	2.0	U
chloroethane	2.0	2.0	U
methylene chloride	2.8	2.8	U
trichlorofluoromethane	2.0	2.0	U
1,1-dichloroethene	1.0	1.0	U
1,1-dichloroethane	1.0	1.0	U
trans-1,2-dichloroethene	1.0	1.0	U
chloroform	1.0	1.0	U
1,2-dichloroethane	1.0	1.0	U
1,1,1-trichloroethane	1.0	1.0	U
carbon tetrachloride	1.0	1.0	U
bromodichloromethane	1.0	1.0	U
1,2-dichloropropane	1.0	1.0	U
cis-1,3-dichloropropene	1.0	1.0	U
trichloroethene	1.0	1.0	U
benzene	1.0	1.0	U
dibromochloromethane	1.0	1.0	U
trans-1,3-dichloropropene	1.0	1.0	U
1,1,2-trichloroethane	1.2	1.2	U
2-chloroethylvinyl ether	2.0	2.0	U
bromoform	1.0	1.0	U
tetrachloroethene	1.0	1.0	U
1,1,2,2-tetrachloroethane	1.0	1.0	U
toluene	1.0	1.0	U
chlorobenzene	1.0	1.0	U
ethylbenzene	1.0	1.0	U
1,3-dichlorobenzene	1.0	1.0	U
1,4-dichlorobenzene	1.0	1.0	U
1,2-dichlorobenzene	1.0	1.0	U
4-methyl-2-pentanone	5.0	5.0	U
1,2-Dichloroethane-d4 (%)	76 - 114	82	
Toluene-d8 (%)	88 - 110	90	
Bromofluorobenzene (%)	86 - 115	96	

Dilution Factor 1

Waste Stream Technology, Inc
Volatile Organics Analysis
40 CFR 136 Method 624

Site : Frontier Chemical - Pendelton
Date Sampled : 9/24/98
Date Received : 9/25/98

Group Number : 9801-1309
Report Units : ug/L
Matrix : Aqueous

		WST Lab ID Client ID Analysis Date	WS45648 Trip Blank 9/29/98	
Compound	Detection Limit/ QC Limits (%)	Result	Q	
chloromethane	2.0	2.0	U	
bromomethane	2.0	2.0	U	
vinyl chloride	2.0	2.0	U	
chloroethane	2.0	2.0	U	
methylene chloride	2.8	2.8	U	
trichlorofluoromethane	2.0	2.0	U	
1,1-dichloroethene	1.0	1.0	U	
1,1-dichloroethane	1.0	1.0	U	
trans-1,2-dichloroethene	1.0	1.0	U	
chloroform	1.0	1.0	U	
1,2-dichloroethane	1.0	1.0	U	
1,1,1-trichloroethane	1.0	1.0	U	
carbon tetrachloride	1.0	1.0	U	
bromodichloromethane	1.0	1.0	U	
1,2-dichloropropane	1.0	1.0	U	
cis-1,3-dichloropropene	1.0	1.0	U	
trichloroethene	1.0	1.0	U	
benzene	1.0	1.0	U	
dibromochloromethane	1.0	1.0	U	
trans-1,3-dichloropropene	1.0	1.0	U	
1,1,2-trichloroethane	1.2	1.2	U	
2-chloroethylvinyl ether	2.0	2.0	U	
bromoform	1.0	1.0	U	
tetrachloroethene	1.0	1.0	U	
1,1,2,2-tetrachloroethane	1.0	1.0	U	
toluene	1.0	1.0	U	
chlorobenzene	1.0	1.0	U	
ethylbenzene	1.0	1.0	U	
1,3-dichlorobenzene	1.0	1.0	U	
1,4-dichlorobenzene	1.0	1.0	U	
1,2-dichlorobenzene	1.0	1.0	U	
4-methyl-2-pentanone	5.0	5.0	U	
1,2-Dichloroethane-d4 (%)	76 - 114	81		
Toluene-d8 (%)	88 - 110	87		#
Bromofluorobenzene (%)	86 - 115	94		

Dilution Factor 1

Waste Stream Technology, Inc
VOCs Method Blank Analysis
40 CFR 136 Method 624

Site : Frontier Chemical - Pendelton
Date Sampled : NA
Date Received : NA

Group Number : 9801-1309
Report Units : ug/L

	WST Lab ID Client ID Analysis Date	IB092998 NA 9/29/98	
Compound	Detection Limit/ QC Limits (%)	Result	Q
chloromethane	2.0	2.0	U
bromomethane	2.0	2.0	U
vinyl chloride	2.0	2.0	U
chloroethane	2.0	2.0	U
methylene chloride	2.8	2.8	U
trichlorofluoromethane	2.0	2.0	U
1,1-dichloroethene	1.0	1.0	U
1,1-dichloroethane	1.0	1.0	U
trans-1,2-dichloroethene	1.0	1.0	U
chloroform	1.0	1.0	U
1,2-dichloroethane	1.0	1.0	U
1,1,1-trichloroethane	1.0	1.0	U
carbon tetrachloride	1.0	1.0	U
bromodichloromethane	1.0	1.0	U
1,2-dichloropropane	1.0	1.0	U
cis-1,3-dichloropropene	1.0	1.0	U
trichloroethene	1.0	1.0	U
benzene	1.0	1.0	U
dibromochloromethane	1.0	1.0	U
trans-1,3-dichloropropene	1.0	1.0	U
1,1,2-trichloroethane	1.2	1.2	U
2-chloroethylvinyl ether	2.0	2.0	U
bromoform	1.0	1.0	U
tetrachloroethene	1.0	1.0	U
1,1,2,2-tetrachloroethane	1.0	1.0	U
toluene	1.0	1.0	U
chlorobenzene	1.0	1.0	U
ethylbenzene	1.0	1.0	U
1,3-dichlorobenzene	1.0	1.0	U
1,4-dichlorobenzene	1.0	1.0	U
1,2-dichlorobenzene	1.0	1.0	U
4-methyl-2-pentanone	5.0	5.0	U
1,2-Dichloroethane-d4 (%)	76 - 114	87	
Toluene-d8 (%)	88 - 110	89	
Bromofluorobenzene (%)	86 - 115	92	

Dilution Factor 1

IB Denotes Instrument Blank

NA Denotes Not Applicable

9801-1290

[illegible]

LAB _____ REFRIGERATOR # _____ SHELF # _____ GROUP # _____ DUE DATE _____

[illegible]

Blank	105450412
-------	-----------

November 5, 1998

Mr. Frank Nerone
Chief Operator
Niagara County Sewer District #1
7346 Liberty Drive
Niagara Falls, NY 14304

Subject: Analytical Sampling Results (10/8/98 Samples)
Groundwater Discharge Through Pre-Treatment System
Pendleton (Frontier Chemical) Site

Dear Mr. Nerone:

Enclosed for your review are analytical results from the October 10, 1998, monthly sampling event for discharge of collected groundwater from the pre-treatment system at the Pendleton Site. Analytical results for this sampling event are compared against the Permit (#96-11) requirements on the attached Analytical Summary and Daily Flow sheets.

A review of the analytical and flow data shows that all permit parameters are significantly below the stated permit requirements.

This data is being provided for your review and concurrence that all permit parameters are well within their limits. If, following review of the enclosed information, you are not in agreement with the above stated conclusion, please contact me at 423-336-4057 as soon as possible so we may discuss any future monitoring requirements.

Sincerely,



John M. Burns
for the Frontier Chemical - Pendleton Site PRP Group

Enclosures: as stated

cc: D. Kummer
Pendleton Site Technical Committee

DAILY FLOW DATA - PENDLETON SITE
OCTOBER 1998

DATE	TOTALIZER READING	DAILY FLOW
10/1/98	295038	135
10/2/98	295173	105
10/3/98	295278	105
10/4/98	295383	104
10/5/98	295487	104
10/6/98	295591	117
10/7/98		117
10/8/98	295825	203
10/9/98	296028	106
10/10/98	296134	102
10/11/98	296236	107
10/12/98	296343	103
10/13/98	296446	104
10/14/98	296550	106
10/15/98	296656	107
10/16/98	296763	79
10/17/98		79
10/18/98	296921	105
10/19/98	297026	211
10/20/98	297237	106
10/21/98	297343	103
10/22/98	297446	104
10/23/98	297550	54
10/24/98		54
10/25/98		54
10/26/98	297711	105
10/27/98	297816	101
10/28/98	297917	100
10/29/98	298017	53
10/30/98		53
10/31/98	298123	

AVERAGE DAILY FLOW IN GALLONS 103

	= DRY VAULT GROUNDWATER RELIEF	
		gallons
		gallons
		gallons
		gallons
TOTAL GALLONS		<u>0</u>

avg =Flow between data points divided by days of missing data.

avg =(295591-295825)/2 or 117 gallons per day for data between 10/6/98 and 10/8/98.

Frontier Chemical - Pendleton Site
Analytical Summary for WS 001
Permit # 96-11
Groundwater Discharge Point: D 002

294 206 Gallons Discharged Prior To 9/24/98
1 619 Gallons Since Last Report
116 Average Daily Flow Based on 14 days Between Samples

Parameters	Permit Limit GPD	Detection Limits	10/8/98 Sample Results GPD
Treatment System Discharge			
Discharge Rate(1)	662		
624 Analytes	ug/L	ug/L	ug/L
Toluene	10.0	1.0	
1,2-Dichloroethane	10.0	1.0	
4-Methyl-2-Pentanone	10.0	5.0	
Vinyl Chloride	10.0	2.0	
Methylene Chloride	10.0	2.8	
trans-1,2-Dichloroethene	10.0	1.0	
1,1,1-Trichloroethane	10.0	1.0	
Trichloroethene	10.0	1.0	
Benzene	10.0	1.0	
Chloromethane		2.0	
Bromomethane		2.0	
Chloroethane		2.0	
Chloroform		1.0	
Carbon Tetrachloride		1.0	
1,1-Dichloroethene		1.0	
Trichlorofluoromethane		2.0	
1,1-Dichloroethane		1.0	
1,2-Dichloropropane		1.0	
Bromodichloromethane		1.0	
2-Chloroethylvinyl ether		2.0	
cis-1,3-Dichloropropene		1.0	
trans-1,3-Dichloropropene		1.0	
1,1,2-Trichloroethane		1.0	
Tetrachloroethene		1.2	
Dibromochloromethane		1.0	
Chlorobenzene		1.0	
Ethylbenzene		1.0	
Bromoform		1.0	
1,1,2,2-Tetrachloroethane		1.0	
1,3-Dichlorobenzene		1.0	
1,4-Dichlorobenzene		1.0	
1,2-Dichlorobenzene		1.0	
Sum of 624 Analytes		100.0	0.0
608 Pesticides(2)	ug/L	ug/L	ug/L
alpha BHC	10.0	0.003	
beta BHC	20.0	0.006	
delta BHC	10.0	0.010	
gamma BHC	10.0	0.003	
Heptachlor	8.0	0.022	
Aldrin	8.0	0.018	
Heptachlor Epoxide	9.0	0.009	
4,4-DDE	20.0	0.005	
Methoxychlor	18.0	0.007	
Metals	mg/L	mg/L	mg/L
Antimony	0.1	0.009	< 0.009
Boron	4.00	0.012	0.811
Chromium	5.33	0.005	< 0.005
Cyanide(T)	2.0	0.005	0.006
Other	mg/L	mg/L	mg/L
Total Phenolics	NA	0.005	< 0.005
TSS	300	4.000	< 4.000

Legend:

- (1) Permit limit @ 662 GPD with maximum daily discharged @ 2500 GPD
(2) Discontinue per April 14, 1997 Letter from F. Narrone to PRP Group.
(a) Detected in blank
NA Not applicable

WASTE STREAM TECHNOLOGY, INC.

302 Grote Street
Buffalo, NY 14207
(716) 876-5290

RECEIVED

1998

Analytical Data Report

Report Date : 10/26/98
Group Number : 9801-1383

Prepared For :
Mr. John Burns
Olin Corporation
P.O. Box 248
1186 Lower River Road NW
Charleston, TN 37310

Site : Frontier - Pendelton

Field and Laboratory Information

Client Id	WST Lab #	Matrix	Date Sampled	Date Received	Time
GAC II	WS46135	Aqueous	10/8/98	10/9/98	1300
Sample Status Upon Receipt : No irregularities.					

Analytical Parameters	Analytical Services Number of Samples	Turnaround Time
Total Metals	1	Standard
Cyanide	1	Standard
Phenol	1	Standard
Total Suspended Solids	1	Standard

Report Released By : Daniel W. Vollmer
Daniel Vollmer, Laboratory QA/QC Officer

ENVIRONMENTAL LABORATORY ACCREDITATION CERTIFICATION NUMBERS

NYSDOH ELAP #11179 NJDEPE #73977 CDHS ELAP #2189

**WASTE STREAM
TECHNOLOGY**

METHODOLOGIES

The specific methodologies employed in obtaining the analytical data reported are indicated on each of the result forms. The method numbers shown refer to the following U.S. Environmental Protection Agency Reference:

Methods for Chemical Analysis of Water and Wastes. EPA 600/4-79-020, March 1979, Revised 1983, U.S. Environmental Monitoring and Support Laboratory, Cincinnati, Ohio 45268.

Federal Register, 40 CFR Part 136: Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act. Revised July 1992.

Test Methods for Evaluating Solid Waste: Physical/Chemical Methods. Third Edition, Revised December 1996, U.S. EPA SW-846.

Annual Book of ASTM Standards, Volume II. ASTM, 100 Harbor Drive, West Conshohocken, PA 19428-2959.

Standard Methods for the Examination of Water and Wastewater. (18th Edition). American Public Health Association, 1105 18th Street, NW, Washington, D.C. 20036.

Waste Stream Technology, Inc.
Metals Analysis Result Report

Site: FRONTIER-PENDELTON
Date Sampled: 10/08/98
Date Received: 10/09/98

Group Number: 9801-1383
Report Units: mg/L
Matrix: AQUEOUS

		Lab ID Number	WS46135		
		Client ID	GAC II		
		Date Digested	10/14/98		
Analyte	Detection Limit	Result	Date Analyzed	Analysis Method	
Boron by ICP	0.012	0.811	10/14/98	EPA 200.7	
Chromium by ICP	0.005	< 0.005	10/14/98	EPA 200.7	
Antimony by GFAA	0.009	< 0.009	10/19/98	EPA 200.9	

Analysis Result Report

Site: FRONTIER-PENDELTON

Date Sampled: 10/08/98

Date Received: 10/09/98

Group Number: 9801-1383

Report Units: mg/L

Matrix: AQUEOUS

Lab ID Number:	WS46135
Client ID:	GAC II

Analyte	Detection Limit	Result	Date Analyzed	Analysis Method
Total Recoverable Phenol	0.005	< 0.005	10/13/98	EPA 420.1
Cyanide in Water	0.005	0.006	10/21/98	EPA 335.2

Waste Stream Technology, Inc.
Total Suspended Solids
EPA 160.2

Site: FRONTIER-PENDELTON
Date Sampled: 10/08/98
Date Received: 10/09/98

Group Number: 9801-1383
Report Units: mg/L
Matrix: AQUEOUS

WST Lab ID	Client ID	Analysis Date	Detection Limit	Result
WS46135	GAC II	10/13/98	4.0	< 4.0

9961-1383

CHAIN OF CUSTODY RECORD

[illegible]

December 10, 1998

Mr. Frank Nerone
Chief Operator
Niagara County Sewer District #1
7346 Liberty Drive
Niagara Falls, NY 14304

Subject: Analytical Sampling Results (11/5/98 Samples)
Groundwater Discharge Through Pre-Treatment System
Pendleton (Frontier Chemical) Site

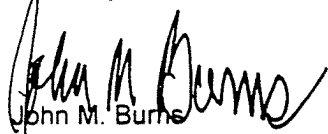
Dear Mr. Nerone:

Enclosed for your review are analytical results from the November 5, 1998, monthly sampling event for discharge of collected groundwater from the pre-treatment system at the Pendleton Site. Analytical results for this sampling event are compared against the Permit (#96-11) requirements on the attached Analytical Summary and Daily Flow sheets.

A review of the analytical and flow data shows that all permit parameters are significantly below the stated permit requirements.

This data is being provided for your review and concurrence that all permit parameters are well within their limits. If, following review of the enclosed information, you are not in agreement with the above stated conclusion, please contact me at 423-336-4057 as soon as possible so we may discuss any future monitoring requirements.

Sincerely,



John M. Burns
for the Frontier Chemical - Pendleton Site PRP Group

Enclosures: as stated

cc: D. Kummer
Pendleton Site Technical Committee

Frontier Chemical - Pendleton Site
Analytical Summary for WS 001
Permit # 96-11
Groundwater Discharge Point: D 002

295,825 Gallons Discharged Prior To 10/8/98
2,788 Gallons Since Last Report
57 Average Daily Flow Based on 23 days Between Samples

Parameters	Permit Limit GPD	Detection Limits	11/5/98 Sample Results GPD
Treatment System Discharge			
Discharge Rate(1)	662		
624 Analytes	ug/L	ug/L	ug/L
Toluene	10.0	1.0	
1,2-Dichloroethane	10.0	1.0	
4-Methyl-2-Pentanone	10.0	5.0	
Vinyl Chloride	10.0	2.0	
Methylene Chloride	10.0	2.8	
trans-1,2-Dichloroethene	10.0	1.0	
1,1,1-Trichloroethane	10.0	1.0	
Trichloroethene	10.0	1.0	
Benzene	10.0	1.0	
Chloromethane		2.0	
Bromomethane		2.0	
Chloroethane		2.0	
Chloroform		1.0	
Carbon Tetrachloride		1.0	
1,1-Dichloroethene		1.0	
Trichlorofluoromethane		2.0	
1,1-Dichloroethane		1.0	
1,2-Dichloropropane		1.0	
Bromodichloromethane		1.0	
2-Chloroethylvinyl ether		2.0	
cis-1,3-Dichloropropene		1.0	
trans-1,3-Dichloropropene		1.0	
1,1,2-Trichloroethane		1.0	
Tetrachloroethene		1.2	
Dibromochloromethane		1.0	
Chlorobenzene		1.0	
Ethylbenzene		1.0	
Bromoform		1.0	
1,1,2,2-Tetrachloroethane		1.0	
1,3-Dichlorobenzene		1.0	
1,4-Dichlorobenzene		1.0	
1,2-Dichlorobenzene		1.0	
Sum of 624 Analytes		100.0	0.0
608 Pesticides(2)	ug/L	ug/L	ug/L
alpha BHC	10.0	0.003	
beta BHC	20.0	0.006	
delta BHC	10.0	0.010	
gamma BHC	10.0	0.003	
Heptachlor	8.0	0.022	
Aldrin	8.0	0.018	
Heptachlor Epoxide	9.0	0.009	
4,4-DDE	20.0	0.005	
Methoxychlor	18.0	0.007	
Metals	mg/L	mg/L	mg/L
Antimony	0.1	0.009	< 0.009
Boron	4.00	0.012	0.725
Chromium	5.33	0.005	< 0.005
Cyanide(T)	2.0	0.005	< 0.005
Other	mg/L	mg/L	mg/L
Total Phenolics	NA	0.005	< 0.005
TSS	300	4.000	< 4.000

Legend:

- (1) Permit limit @ 662 GPD with maximum daily discharged @ 2500 GPD
 (2) Discontinue per April 14, 1997 Letter from F. Narrone to PRP Group.
 (a) Detected in blank
 NA Not applicable
 (*) Resampled date due to laboratory not picking up sample taken on 9/3/98

DAILY FLOW DATA - PENDLETON SITE
NOVEMBER 1998

DATE	TOTALIZER READING	DAILY FLOW
11/1/98	298229	106
11/2/98	298335	53
11/3/98	298388	113 avg.
11/4/98		113 avg.
11/5/98	298613	106 Sampled
11/6/98	298719	71 avg.
11/7/98		71 avg.
11/8/98		71 avg.
11/9/98	298933	107
11/10/98	299040	105
11/11/98	299145	107
11/12/98	299252	108
11/13/98	299360	53
11/14/98	299413	105
11/15/98	299518	107
11/16/98	299625	53
11/17/98	299678	107
11/18/98	299785	81 avg.
11/19/98		81 avg.
11/20/98	299947	105
11/21/98	300052	82 avg.
11/22/98		82 avg.
11/23/98	300215	53
11/24/98	300268	53
11/25/98	300321	105
11/26/98	300426	106
11/27/98	300532	53
11/28/98	300585	106
11/29/98	300691	52
11/30/98	300743	

AVERAGE DAILY FLOW IN GALLONS 87

	= DRY VAULT GROUNDWATER RELIEF	
		gallons
		gallons
		gallons
		gallons
TOTAL GALLONS		<u>0</u>

avg =flow between data points divided by days of missing data

avg =(298613-298388)/2 or 113 gallons per day for data between 11/3/98 and 11/5/98

WASTE STREAM TECHNOLOGY, INC.

302 Grote Street
Buffalo, NY 14207
(716) 876-5290

Analytical Data Report

Report Date : 11/23/98
Group Number : 9801-1532

Prepared For :
Mr. John Burns
Olin Corporation
P.O. Box 248
1186 Lower River Road NW
Charleston, TN 37310

Site : Frontier - Pendelton

Field and Laboratory Information

Client Id	WST Lab #	Matrix	Date Sampled	Date Received	Time
GAC II	WS46988	Aqueous	11/5/98	11/6/98	1220
Sample Status Upon Receipt : No irregularities.					

Analytical Services		
Analytical Parameters	Number of Samples	Turnaround Time
Total Metals	1	Standard
Cyanide	1	Standard
Phenol	1	Standard
Total Suspended Solids	1	Standard

Report Released By : Daniel W. Vollmer
Daniel Vollmer, Laboratory QA/QC Officer

ENVIRONMENTAL LABORATORY ACCREDITATION CERTIFICATION NUMBERS
NYSDOH ELAP #11179 NJDEPE #73977 CDHS ELAP #2189



METHODOLOGIES

The specific methodologies employed in obtaining the analytical data reported are indicated on each of the result forms. The method numbers shown refer to the following U.S. Environmental Protection Agency Reference:

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Federal Register, 40 CFR Part 136: Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act. Revised July 1992.

Test Methods for Evaluating Solid Waste: Physical/Chemical Methods. Third Edition, Revised December 1996, U.S. EPA SW-846.

Annual Book of ASTM Standards, Volume II. ASTM, 100 Harbor Drive, West Conshohocken, PA 19428-2959.

Standard Methods for the Examination of Water and Wastewater. (18th Edition). American Public Health Association, 1105 18th Street, NW, Washington, D.C. 20036.

Waste Stream Technology, Inc.
Metals Analysis Result Report

Site: FRONTIER-PENDELTON
Date Sampled: 11/05/98
Date Received: 11/06/98

Group Number: 9801-1532
Report Units: mg/L
Matrix: AQUEOUS

		Lab ID Number	WS46988		
		Client ID	GAC II		
		Date Digested	11/19/98		
Analyte	Detection Limit	Result	Date Analyzed	Analysis Method	
Antimony by GFAA	0.009	< 0.009	11/20/98	EPA 200.9	
Chromium by ICP	0.005	< 0.005	11/19/98	EPA 200.7	
Boron by ICP	0.012	0.725	11/19/98	EPA 200.7	

waste Stream Technology, Inc.
Total Suspended Solids
EPA 160.2

Site: FRONTIER-PENDELTON
Date Sampled: 11/05/98
Date Received: 11/06/98

Group Number: 9801-1532
Report Units: mg/L
Matrix: AQUEOUS

WST Lab ID	Client ID	Analysis Date	Detection Limit	Result
WS46988	GAC II	11/09/98	4.0	< 4.0

Waste Stream Technology, Inc.
Total Recoverable Phenol
EPA 420.1

Site: FRONTIER-PENDELTON
Date Sampled: 11/05/98
Date Received: 11/06/98

Group Number: 9801-1532
Report Units: mg/L
Matrix: AQUEOUS

WST Lab ID	Client ID	Analysis Date	Detection Limit	Result
WS46988	GAC II	11/18/98	0.005	< 0.005

Waste Stream Technology, Inc.
Cyanide in Water
EPA 335.2

Site: FRONTIER-PENDELTON
Date Sampled: 11/05/98
Date Received: 11/06/98

Group Number: 9801-1532
Report Units: mg/L
Matrix: AQUEOUS

WST Lab ID	Client ID	Analysis Date	Detection Limit	Result
WS46988	GAC II	11/17/98	0.005	< 0.005

9401-1082

CHAIN OF CUSTODY RECORD

[illegible]

January 6, 1999

Mr. Frank Nerone
Chief Operator
Niagara County Sewer District #1
7346 Liberty Drive
Niagara Falls, NY 14304

Subject: Analytical Sampling Results (12/4/98 Samples)
Groundwater Discharge Through Pre-Treatment System
Pendleton (Frontier Chemical) Site

Dear Mr. Nerone:

Enclosed for your review are analytical results from the December 4, 1998, monthly sampling event for discharge of collected groundwater from the pre-treatment system at the Pendleton Site. Analytical results for this sampling event are compared against the Permit (#96-11) requirements on the attached Analytical Summary and Daily Flow sheets.

A review of the analytical and flow data shows that all permit parameters are significantly below the stated permit requirements.

This data is being provided for your review and concurrence that all permit parameters are well within their limits. If, following review of the enclosed information, you are not in agreement with the above stated conclusion, please contact me at 423-336-4057 as soon as possible so we may discuss any future monitoring requirements.

Sincerely,


John M. Burns

for the Frontier Chemical - Pendleton Site PRP Group

Enclosures: as stated

cc: D. Kummer
Pendleton Site Technical Committee

Distribution: Niagara County Sewer District Monthly Report

Frank Nerone Original Copy of all documents; express mailed for next day delivery.

Dan Kummer Copy of all information; include Dan's copy with Frank Nerrone Copy.

PRP Group from Distribution labels; send copy of cover letter, daily flow data and analytical summary via regular mail.

Tom Morris
IBM Corporation
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Somers, NY 10589
Phone: 914-766-2739
FAX: 914-766-2824

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Bill Witt
Radian International, LLC
304 West Wackerly Street
Midland, MI 48640
Phone: 517-636-2264
FAX: 517-636-8612

Frank Nerone, Chief Operator
Niagara County Sewer District #1
7346 Liberty Drive
Niagara Falls, NY 14304
Phone: 716-693-0001
FAX: 726-693-8759

Dan Kummer, Laboratory Director
Niagara County Sewer District #1
7346 Liberty Drive
Niagara Falls, NY 14304
Phone: 716-693-0001
FAX: 716-693-8759

DAILY FLOW DATA - PENDLETON SITE
DECEMBER 1998

DATE	TOTALIZER READING	DAILY FLOW
12/1/98	300861	114 avg.
12/2/98		114 avg.
12/3/98	301088	69 Sampled
12/4/98	301157	93
12/5/98	301250	108 avg.
12/6/98		108 avg.
12/7/98	301465	107
12/8/98	301572	57
12/9/98	301629	107
12/10/98	301736	53
12/11/98	301789	106 avg.
12/12/98		106 avg.
12/13/98	302001	54
12/14/98	302055	53
12/15/98	302108	53
12/16/98	302161	105
12/17/98	302266	53
12/18/98	302319	106
12/19/98	302425	106
12/20/98	302531	53
12/21/98	302584	105
12/22/98	302689	394
12/23/98	303083	220
12/24/98	303303	110 avg.
12/25/98		110 avg.
12/26/98	303523	107
12/27/98	303630	53
12/28/98	303683	105
12/29/98	303788	52
12/30/98	303840	108
12/31/98	303948	

AVERAGE DAILY FLOW IN GALLONS 103

	= DRY VAULT GROUNDWATER RELIEF	
		gallons
		gallons
		gallons
		gallons
TOTAL GALLONS		<u>0</u>

avg =flow between data points divided by days of missing data

avg =(301088-300861)/2 or 114 gallons per day for data between 12/1/98 and 12/3/98

DAILY FLOW DATA - PENDLETON SITE
DECEMBER 1998

DATE	TOTALIZER READING	DAILY FLOW
12/1/98	300861	114 avg.
12/2/98		114 avg.
12/3/98	301088	69 Sampled
12/4/98	301157	93
12/5/98	301250	108 avg.
12/6/98		108 avg.
12/7/98	301465	107
12/8/98	301572	57
12/9/98	301629	107
12/10/98	301736	53
12/11/98	301789	106 avg.
12/12/98		106 avg.
12/13/98	302001	54
12/14/98	302055	53
12/15/98	302108	53
12/16/98	302161	105
12/17/98	302266	53
12/18/98	302319	106
12/19/98	302425	106
12/20/98	302531	53
12/21/98	302584	105
12/22/98	302689	394
12/23/98	303083	220
12/24/98	303303	110 avg.
12/25/98		110 avg.
12/26/98	303523	107
12/27/98	303630	53
12/28/98	303683	105
12/29/98	303788	52
12/30/98	303840	108
12/31/98	303948	

AVERAGE DAILY FLOW IN GAL 103

	= DRY VAULT GROUNDWATER RELIEF	
		gallons
		gallons
		gallons
		gallons
TOTAL GALLONS		<u>0</u>

avg =flow between data points divided by days of missing data

avg =(301088-300861)/2 or 114 gallons per day for data between 12/1/98 and 12/3/98

WASTE STREAM TECHNOLOGY, INC.

302 Grote Street
Buffalo, NY 14207
(716) 876-5290

Analytical Data Report

Report Date : 12/18/98
Group Number : 9801-1687

Prepared For :
Mr. John Burns
Olin Corporation
P.O. Box 248
1186 Lower River Road NW
Charleston, TN 37310

Site : Frontier-Pendelton

Field and Laboratory Information

Client Id	WST Lab #	Matrix	Date Sampled	Date Received	Time
GAC II	WS47803	Aqueous	12/04/98	12/04/98	1300
Sample Status Upon Receipt : No irregularities.					

Analytical Parameters	Analytical Services Number of Samples	Turnaround Time
Total Metals	1	Standard
Cyanide	1	Standard
Phenol	1	Standard
Total Suspended Solids	1	Standard

Report Released By : Daniel W Vollmer
Daniel Vollmer, Laboratory QA/QC Officer

ENVIRONMENTAL LABORATORY ACCREDITATION CERTIFICATION NUMBERS
NYSDOH ELAP #11179 NJDEPE #73977 CDHS ELAP #2189

METHODOLOGIES

The specific methodologies employed in obtaining the analytical data reported are indicated on each of the result forms. The method numbers shown refer to the following U.S. Environmental Protection Agency Reference:

Methods for Chemical Analysis of Water and Wastes. EPA 600/4-79-020. March 1979, Revised 1983, U.S. Environmental Monitoring and Support Laboratory, Cincinnati, Ohio 45268.

Federal Register, 40 CFR Part 136: Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act. Revised July 1992.

Test Methods for Evaluating Solid Waste: Physical/Chemical Methods. Third Edition, Revised December 1996, U.S. EPA SW-846.

Annual Book of ASTM Standards, Volume II. ASTM, 100 Harbor Drive, West Conshohocken, PA 19428-2959.

Standard Methods for the Examination of Water and Wastewater. (18th Edition). American Public Health Association, 1105 18th Street, NW, Washington, D.C. 20036.

Waste Stream Technology, Inc.
Wet Chemistry Analyses

Site: Frontier-Pendelton
Date Sampled: 12/04/98
Date Received: 12/04/98

Group Number: 9801-1687
Matrix: Aqueous

WST ID: WS47803
Client ID: GAC II

Analysis	Method Reference	Detection Limit	Result	Units	Date Analyzed
Cyanide in Water	EPA 335.2	0.005	0.007	mg/L	12/09/98
Total Suspended Solids	EPA 160.2	4.0	Not detected	mg/L	12/08/98
Total Recoverable Phenol	EPA 420.1	0.005	Not detected	mg/L	12/11/98

Waste Stream Technology, Inc.
Metals Analysis Result Report

Site: Frontier-Pendelton
Date Sampled: 12/04/98
Date Received: 12/04/98

Group Number: 9801-1687
Units: mg/L
Matrix: Aqueous

WST ID: WS47803
Client ID: GAC II
Digestion Date: 12/10/98

Analyte	Detection Limit	Result	Date Analyzed	Analysis Method
Antimony by GFAA	0.009	Not detected	12/15/98	EPA 200.9
Boron by ICP	0.012	0.765	12/16/98	EPA 200.7
Chromium by ICP	0.005	Not detected	12/16/98	EPA 200.7

CHAIN OF CUSTODY RECORD

PROJECT NO: E 4114		SITE NAME: Freshwater Pollution		PRESERVATIVES		REMARKS	
SAMPLERS (SIGNATURE): <i>[Signature]</i>							
SAMPLE NO.	DATE	TIME	COMP	GRAB	MATRIX	SAMPLE LOCATION	SIZE & NO. OF CON-TAINERS
12 L	12/14	14:00	✓		H ₂ O	GAAC 7L	1 L Amber
03622	"	"	✓		"	"	500 mL
12 L	"	"	✓		"	"	1 L
03623	"	"	✓		"	"	1 L
12 L	"	"	✓		"	"	1 L
03624	"	"	✓		"	"	1 L
12 L	"	"	✓		"	"	1 L
03625	"	"	✓		"	"	1 L
12 L	"	"	✓		"	"	1 L
03626	"	"	✓		"	"	1 L
12 L	"	"	✓		"	"	1 L
03627	"	"	✓		"	"	1 L
12 L	"	"	✓		"	"	1 L
03628	"	"	✓		"	"	1 L

RELINQUISHED BY (SIGNATURE)	DATE/TIME	RECEIVED BY (SIGNATURE)	DATE/TIME
<i>[Signature]</i>	12/14/10 2:00	<i>[Signature]</i>	12/14/10 13:00
<i>[Signature]</i>		<i>[Signature]</i>	

RELINQUISHED BY (SIGNATURE)	DATE/TIME	RECEIVED BY (SIGNATURE)	DATE/TIME
<i>[Signature]</i>		<i>[Signature]</i>	
<i>[Signature]</i>		<i>[Signature]</i>	

SPECIAL INSTRUCTIONS:

TURNAROUND TIME _____

February 10, 1999

Mr. Frank Nerone
Chief Operator
Niagara County Sewer District #1
7346 Liberty Drive
Niagara Falls, NY 14304

Subject: Analytical Sampling Results (1/8/99 Sample)
Groundwater Discharge Through Pre-Treatment System
Pendleton (Frontier Chemical) Site

Dear Mr. Nerone:

Enclosed for your review are analytical results from the January 8, 1998, monthly sampling event for discharge of collected groundwater from the pre-treatment system at the Pendleton Site. Analytical results for this sampling event are compared against the Permit (#96-11) requirements on the attached Analytical Summary and Daily Flow sheets.

A review of the analytical and flow data shows that all permit parameters are significantly below the stated permit requirements.

This data is being provided for your review and concurrence that all permit parameters are well within their limits. If, following review of the enclosed information, you are not in agreement with the above stated conclusion, please contact me at 423-336-4057 as soon as possible so we may discuss any future monitoring requirements.

Sincerely,



John M. Burns
for the Frontier Chemical - Pendleton Site PRP Group

Enclosures: as stated

cc: D. Kummer
Pendleton Site Technical Committee

Frontier Chemical - Pendleton Site
Analytical Summary for WS 001
Permit # 98-11
Groundwater Discharge Point: D 002

301 088 Gallons Discharged Prior To 12/4/98
3,546 Gallons Since Last Report
96 Average Daily Flow Based on 37 days Between Samples

Parameters	Permit Limit GPD	Detection Limits	1/8/99 Sample Results GPD
Treatment System Discharge			
Discharge Rate(1)	662		
624 Analytes	ug/L	ug/L	ug/L
Toluene	10.0	1.0	
1,2-Dichloroethane	10.0	1.0	
4-Methyl-2-Pentanone	10.0	5.0	
Vinyl Chloride	10.0	2.0	
Methylene Chloride	10.0	2.8	
trans-1,2-Dichloroethene	10.0	1.0	
1,1,1-Trichloroethane	10.0	1.0	
Trichloroethene	10.0	1.0	
Benzene	10.0	1.0	
Chloromethane		2.0	
Bromomethane		2.0	
Chloroethane		2.0	
Chloroform		1.0	
Carbon Tetrachloride		1.0	
1,1-Dichloroethene		1.0	
Trichlorofluoromethane		2.0	
1,1-Dichloroethane		1.0	
1,2-Dichloropropane		1.0	
Bromodichloromethane		1.0	
2-Chloroethylvinyl ether		2.0	
cis-1,3-Dichloropropene		1.0	
trans-1,3-Dichloropropene		1.0	
1,1,2-Trichloroethane		1.0	
Tetrachloroethene		1.2	
Dibromochloromethane		1.0	
Chlorobenzene		1.0	
Ethylbenzene		1.0	
Bromoform		1.0	
1,1,2,2-Tetrachloroethane		1.0	
1,3-Dichlorobenzene		1.0	
1,4-Dichlorobenzene		1.0	
1,2-Dichlorobenzene		1.0	
Sum of 624 Analytes		100.0	0.0
608 Pesticides(2)	ug/L	ug/L	ug/L
alpha BHC	10.0	0.003	
beta BHC	20.0	0.006	
delta BHC	10.0	0.010	
gamma BHC	10.0	0.003	
Heptachlor	8.0	0.022	
Aldrin	8.0	0.018	
Heptachlor Epoxide	9.0	0.009	
4,4-DDE	20.0	0.005	
Methoxychlor	18.0	0.007	
Metals	mg/L	mg/L	mg/L
Antimony	0.1	0.009	< 0.009
Boron	4.00	0.012	< 0.011
Chromium	5.33	0.005	< 0.005
Cyanide(T)	2.0	0.005	0.005
Other	mg/L	mg/L	mg/L
Total Phenolics	NA	0.005	< 0.005
TSS	300	4.000	< 4.000

Legend:

- (1) Permit limit @ 662 GPD with maximum daily discharged @ 2500 GPD
(2) Discontinue per April 14, 1997 Letter from F. Narrone to PRP Group
(a) Detected in blank
NA Not applicable

DAILY FLOW DATA - PENDLETON SITE
DECEMBER 1998

DATE	TOTALIZER READING	DAILY FLOW
12/1/98	300861	114 avg.
12/2/98		114 avg.
12/3/98	301088	69 Sampled
12/4/98	301157	93
12/5/98	301250	108 avg.
12/6/98		108 avg.
12/7/98	301465	107
12/8/98	301572	57
12/9/98	301629	107
12/10/98	301736	53
12/11/98	301789	106 avg.
12/12/98		106 avg.
12/13/98	302001	54
12/14/98	302055	53
12/15/98	302108	53
12/16/98	302161	105
12/17/98	302266	53
12/18/98	302319	106
12/19/98	302425	106
12/20/98	302531	53
12/21/98	302584	105
12/22/98	302689	394
12/23/98	303083	220
12/24/98	303303	110 avg.
12/25/98		110 avg.
12/26/98	303523	107
12/27/98	303630	53
12/28/98	303683	105
12/29/98	303788	52
12/30/98	303840	108
12/31/98	303948	

AVERAGE DAILY FLOW IN GALLONS 103

	= DRY VAULT GROUNDWATER RELIEF	
		gallons
		gallons
		gallons
		gallons
TOTAL GALLONS		<u>0</u>

avg =flow between data points divided by days of missing data

avg =(301088-300861)/2 or 114 gallons per day for data between 12/1/98 and 12/3/98

DAILY FLOW DATA - PENDLETON SITE
JANUARY 1999

DATE	TOTALIZER READING	DAILY FLOW
1/1/99		80 avg.
1/2/99		80 avg.
1/3/99	304161	54
1/4/99	304215	53
1/5/99	304268	108
1/6/99	304376	45
1/7/99	304421	0
1/8/99	304421	213
1/9/99	304634	0 Sampled
1/10/99	304634	108
1/11/99	304742	108
1/12/99	304850	54
1/13/99	304904	108
1/14/99	305012	83 avg.
1/15/99		83 avg.
1/16/99	305178	109
1/17/99	305287	105
1/18/99	305392	107
1/19/99	305499	109
1/20/99	305608	107
1/21/99	305715	51
1/22/99	305766	105
1/23/99	305871	348 avg.
1/24/99		348 avg.
1/25/99	306567	107
1/26/99	306674	53
1/27/99	306727	106
1/28/99	306833	54
1/29/99	306887	80 avg.
1/30/99		80 avg.
1/31/99	307047	

AVERAGE DAILY FLOW IN GALLONS 102

	= DRY VAULT GROUNDWATER RELIEF	
		gallons
		gallons
		gallons
		gallons
TOTAL GALLONS		<u>0</u>

avg =flow between data points divided by days of missing data

avg =(304161-303840)/4 or 80 gallons per day for data between 12/30/98 and 1/3/99

WASTE STREAM TECHNOLOGY, INC.

302 Grote Street
Buffalo, NY 14207
(716) 876-5290

Analytical Data Report

Report Date : 01/22/99
Group Number : 9901-023

Prepared For :
Mr. John Burns
Olin Corporation
P.O. Box 248
1186 Lower River Road NW
Charleston, TN 37310

Site : Frontier - Pendleton

Field and Laboratory Information

Client Id	WST Lab #	Matrix	Date Sampled	Date Received	Time
GAC II	WS48623	Aqueous	01/08/99	01/08/99	1300
Sample Status Upon Receipt : No irregularities.					

Analytical Parameters	Analytical Services Number of Samples	Turnaround Time
Metals	1	Standard
Cyanide	1	Standard
Phenol	1	Standard
Total Suspended Solids	1	Standard

Report Released By : Daniel W. Vollmer
Daniel Vollmer, Laboratory QA/QC Officer

ENVIRONMENTAL LABORATORY ACCREDITATION CERTIFICATION NUMBERS
NYSDOH ELAP #11179 NJDEPE #73977 CDHS ELAP #2189



METHODOLOGIES

The specific methodologies employed in obtaining the analytical data reported are indicated on each of the result forms. The method numbers shown refer to the following U.S. Environmental Protection Agency Reference:

Methods for Chemical Analysis of Water and Wastes. EPA 600/4-79-020, March 1979, Revised 1983, U.S. Environmental Monitoring and Support Laboratory, Cincinnati, Ohio 45268.

Federal Register, 40 CFR Part 136: Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act. Revised July 1992.

Test Methods for Evaluating Solid Waste: Physical/Chemical Methods. Third Edition, Revised December 1996, U.S. EPA SW-846.

Annual Book of ASTM Standards, Volume II. ASTM, 100 Harbor Drive, West Conshohocken, PA 19428-2959.

Standard Methods for the Examination of Water and Wastewater. (18th Edition). American Public Health Association, 1105 18th Street, NW. Washington, D.C. 20036.

Waste Stream Technology, Inc.
Metals Analysis Result Report

Site: Frontier-Pendleton
Date Sampled: 01/08/99
Date Received: 01/08/99

Group Number: 9901-023
Units: mg/L
Matrix: Aqueous

WST ID: WS48623
Client ID: GAC II
Digestion Date: 01/11/99

Analyte	Detection Limit	Result	Date Analyzed	Analysis Method
Antimony by GFAA	0.009	Not detected	01/19/99	EPA 200.9
Boron by ICP	0.012	0.691	01/19/99	EPA 200.7
Chromium by ICP	0.005	Not detected	01/19/99	EPA 200.7

Waste Stream Technology, Inc.
Wet Chemistry Analyses

Site: Frontier-Pendleton
Date Sampled: 01/08/99
Date Received: 01/08/99

Group Number: 9901-023
Matrix: Aqueous

WST ID: WS48623
Client ID GAC II

Analysis	Method Reference	Detection Limit	Result	Units	Date Analyzed
Total Suspended Solids	EPA 160.2	4.0	Not detected	mg/L	01/13/99
Cyanide in Water	EPA 335.2	0.005	0.005	mg/L	01/20/99
Total Recoverable Phenol	EPA 420.1	0.005	Not detected	mg/L	01/18/99

CHAIN OF CUSTODY RECORD

[illegible]

March 11, 1999

Mr. Frank Nerone
Chief Operator
Niagara County Sewer District #1
7346 Liberty Drive
Niagara Falls, NY 14304

Subject: Analytical Sampling Results (2/4/99 Sample)
Groundwater Discharge Through Pre-Treatment System
Pendleton (Frontier Chemical) Site

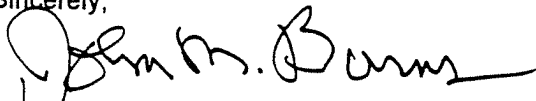
Dear Mr. Nerone:

Enclosed for your review are analytical results from the February 4, 1999, monthly sampling event for discharge of collected groundwater from the pre-treatment system at the Pendleton Site. Analytical results for this sampling event are compared against the Permit (#98-11) requirements on the attached Analytical Summary and Daily Flow sheets.

A review of the analytical and flow data shows that all permit parameters are significantly below the stated permit requirements.

This data is being provided for your review and concurrence that all permit parameters are well within their limits. If, following review of the enclosed information, you are not in agreement with the above stated conclusion, please contact me at 423-336-4057 as soon as possible so we may discuss any future monitoring requirements.

Sincerely,



John M. Burns
for the Frontier Chemical - Pendleton Site PRP Group

Enclosures: as stated

cc: D. Kummer
Pendleton Site Technical Committee

Frontier Chemical - Pendleton Site
Analytical Summary for WS 001
Permit # 98-11
Groundwater Discharge Point: D 002

304 634 Gallons Discharged Prior To 1/8/99
2,572 Gallons Since Last Report
95 Average Daily Flow Based on 27 days Between Samples

Parameters	Permit Limit GPD	Detection Limits	2/5/99 Sample Results GPD
Treatment System Discharge			
Discharge Rate(1)	662		
624 Analytes	ug/L	ug/L	ug/L
Toluene	10.0	1.0	
1,2-Dichloroethane	10.0	1.0	
4-Methyl-2-Pentanone	10.0	5.0	
Vinyl Chloride	10.0	2.0	
Methylene Chloride	10.0	2.0	
trans-1,2-Dichloroethene	10.0	1.0	
1,1,1-Trichloroethane	10.0	1.0	
Trichloroethene	10.0	1.0	
Benzene	10.0	1.0	
Chloromethane		2.0	
Bromomethane		2.0	
Chloroethane		2.0	
Chloroform		1.0	
Carbon Tetrachloride		1.0	
1,1-Dichloroethene		1.0	
Trichlorofluoromethane		2.0	
1,1-Dichloroethane		1.0	
1,2-Dichloropropane		1.0	
Bromodichloromethane		1.0	
2-Chloroethylvinyl ether		2.0	
cis-1,3-Dichloropropene		1.0	
trans-1,3-Dichloropropene		1.0	
1,1,2-Trichloroethane		1.0	
Tetrachloroethene		1.2	
Dibromochloromethane		1.0	
Chlorobenzene		1.0	
Ethylbenzene		1.0	
Bromoform		1.0	
1,1,2,2-Tetrachloroethane		1.0	
1,3-Dichlorobenzene		1.0	
1,4-Dichlorobenzene		1.0	
1,2-Dichlorobenzene		1.0	
Sum of 624 Analytes		100.0	0.0
608 Pesticides(2)	ug/L	ug/L	ug/L
alpha BHC	10.0	0.003	
beta BHC	20.0	0.006	
delta BHC	10.0	0.010	
gamma BHC	10.0	0.003	
Heptachlor	8.0	0.022	
Aldrin	8.0	0.018	
Heptachlor Epoxide	8.0	0.009	
4,4-DDE	20.0	0.005	
Methoxychlor	18.0	0.007	
Metals	mg/L	mg/L	mg/L
Antimony	0.1	0.009	< 0.009
Boron	4.00	0.012	0.581
Chromium	5.33	0.005	< 0.005
Cyanide(T)	2.0	0.005	0.005
Other	mg/L	mg/L	mg/L
Total Phenolics	NA	0.005	< 0.005
TSS	300	4.000	5.200

Legend:

(1) Permit limit @ 662 GPD with maximum daily discharged @ 2500 GPD

(2) Discontinue per April 14, 1997 Letter from F. Narrone to PRP Group.

(a) Detected in blank

NA Not applicable

DAILY FLOW DATA - PENDLETON SITE
FEBRUARY 1999

DATE	TOTALIZER READING	DAILY FLOW
2/1/99	307101	51
2/2/99	307152	54
2/3/99	307206	512 avg.
2/4/99		512 Sampled
2/5/99	308229	441
2/6/99	308670	364 avg.
2/7/99		364 avg.
2/8/99	309397	331
2/9/99	309728	372
2/10/99	310100	373
2/11/99	310473	371 avg.
2/12/99		371 avg.
2/13/99		371 avg.
2/14/99	311585	337
2/15/99	311922	272
2/16/99	312194	273
2/17/99	312467	275
2/18/99	312742	319
2/19/99	313061	285
2/20/99	313346	224
2/21/99	313570	173
2/22/99	313743	218
2/23/99	313961	165
2/24/99	314126	109
2/25/99	314235	165
2/26/99	314400	135 avg.
2/27/99		135 avg.
2/28/99	314670	

AVERAGE DAILY FLOW IN GALLONS 280

	= DRY VAULT GROUNDWATER RELIEF	
		gallons
		gallons
		gallons
		gallons
TOTAL GALLONS		<u>0</u>

avg =flow between data points divided by days of missing data

avg =(308229-307206)/2 or 80 gallons per day for data between 2/3/99 and 2/5/99

WASTE STREAM TECHNOLOGY, INC.

302 Grote Street
Buffalo, NY 14207
(716) 876-5290

Analytical Data Report

Report Date : 02/19/99
Group Number : 9901-161

Prepared For :
Mr. John Burns
Olin Corporation
P.O. Box 248
1186 Lower River Road NW
Charleston, TN 37310

Site : Frontier - Pendleton

Field and Laboratory Information

Client Id	WST Lab #	Matrix	Date Sampled	Date Received	Time
GAC II	WS49332	Aqueous	02/04/99	02/05/99	12:20
Sample Status Upon Receipt : No irregularities.					

Analytical Parameters	Analytical Services Number of Samples	Turnaround Time
Total Metals	1	Standard
Cyanide	1	Standard
Phenol	1	Standard
Total Suspended Solids	1	Standard

Report Released By : Daniel W. Vollmer
Daniel Vollmer, Laboratory QA/QC Officer

ENVIRONMENTAL LABORATORY ACCREDITATION CERTIFICATION NUMBERS
NYSDOH ELAP #11179 NJDEPE #73977 CDHS ELAP #2189



METHODOLOGIES

The specific methodologies employed in obtaining the analytical data reported are indicated on each of the result forms. The method numbers shown refer to the following U.S. Environmental Protection Agency Reference:

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Federal Register, 40 CFR Part 136: Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act. Revised July 1992.

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Standard Methods for the Examination of Water and Wastewater. (18th Edition). American Public Health Association, 1105 18th Street, NW, Washington, D.C. 20036.

Waste Stream Technology, Inc.
Wet Chemistry Analyses

Site: Frontier - Pendelton
Date Sampled: 02/04/99
Date Received: 02/05/99

Group Number: 9901-161
Matrix: Aqueous

WST ID: WS49332
Client ID: GAC II

Analysis	Method Reference	Detection Limit	Result	Units	Date Analyzed
Total Suspended Solids	EPA 160.2	4.0	5.2	mg/L	02/09/99
Cyanide in Water	EPA 335.2	0.005	0.005	mg/L	02/15/99
Total Recoverable Phenol	EPA 420.1	0.005	Not detected	mg/L	02/11/99

Waste Stream Technology, Inc.
Metals Analysis Result Report

Site: Frontier - Pendelton
Date Sampled: 02/04/99
Date Received: 02/05/99

Group Number: 9901-161
Units: mg/L
Matrix: Aqueous

WST ID: WS49332
Client ID: GAC II
Digestion Date: 02/10/99

Analyte	Detection Limit	Result	Date Analyzed	Analysis Method
Antimony by GFAA	0.009	Not detected	02/19/99	EPA 200.9
Boron by ICP	0.012	0.581	02/11/99	EPA 200.7
Chromium by ICP	0.005	Not detected	02/11/99	EPA 200.7

CHAIN OF CUSTODY RECORD

[illegible]

Distribution:

Frank Nerrone Original Copy of all documents; express mailed for next day delivery.

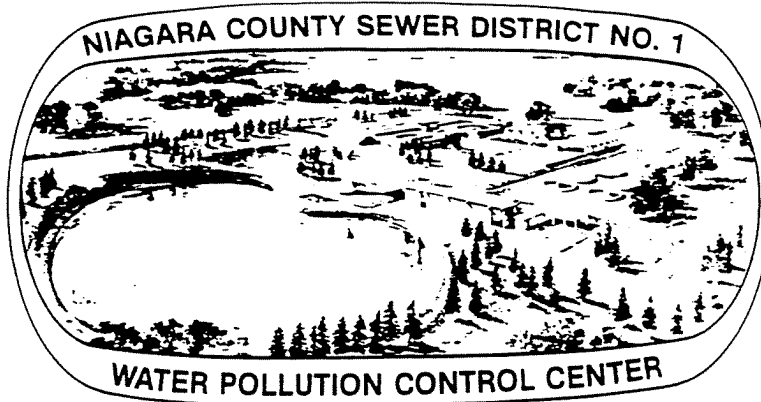
Dan Commer Copy of all information; include Dan's copy with Frank Nerrone Copy.

PRP Group from Distribution labels; send copy of cover letter, daily flow data and analytical summary via regular mail

Frontier Chemical - Pendleton Site
March 1999

B-2 Niagara County Sewer District #1 Permit

7346 Liberty Drive
Niagara Falls, NY 14304-3762
Phone 716-693-0001
FAX 716-693-8759



WRIGHT H. ELLIS
Chairman

STEVEN C. RICHARDS
Vice-Chairman

FRANK A. NERONE
Chief Operator

January 11, 1999

Pendleton Site PRP Group
c/o Olin Corporation
P.O. Box 248
Charleston, TN 37310-0248

ATTN: Mr. John Burns

Re: PRP Group Industrial Waste Permit
Pendleton (Frontier Chemical) Site

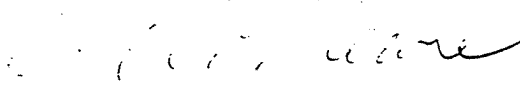
Gentlemen:

Enclosed is a renewed permit for the discharge of contaminated groundwater.

Please review the permit carefully. If there are any questions, please feel free to contact me.

Very truly yours,

NIAGARA COUNTY SEWER DISTRICT #1


Frank A. Nerone, P.E.
Chief Operator

FAN/dm
IPDIX/IWPCG9811

Enclosure

Niagara County Sewer District #1

Industrial Waste Permit

Industrial User: Pendleton Site PRP Group
(Permittee)

Division Name (if Applicable): c/o Olin Corporation

Mailing Address: P.O. Box 248
Street or P.O. Box

Charleston, TN 37310-0248
City, State and Zip Code

Site Address: Pendleton Site Townline Road
Street Address

Pendleton, New York
City, State

The above Industrial User is authorized to discharge contaminated ground-water to the Niagara County Sewer District #1 sewer system in compliance with the District's Sewer Use Law, Local Law No.1, Resolution No. 7-94, any applicable provisions of Federal or State law or regulation, and in accordance with discharge points(s), effluent limitations, monitoring requirements, and other conditions set forth herein.

Effective Date: August 28, 1998

Expiration Date: August 28, 2000

(Application for renewal shall be
submitted 90 days prior to expiration)

District Permit No. 98-11

Date: 1/11/04 Signed: [Signature]
(Authorized Signature)

Schedule A - Listing of Discharged Wastestreams

Industry Name: Pendleton (Frontier Chemical) Site
Groundwater Remediation

The following wastestreams are discharged to sanitary sewer system tributary of Niagara County Sewer District #1.

<u>Waste-Streams</u>	<u>Nature Of Waste</u>	<u>Volume gallons per day</u>	<u>Discharge Point</u>
WS 001	Groundwater Remediation	250	D 002

PART I - WASTEWATER DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

Industry Name: Pendleton (Frontier Chemical) Site
Sample Point A:
Sample Point: Groundwater Pump Station Discharge
Description : Contaminated Groundwater

		<u>Monitoring Requirements</u>	
<u>Parameter</u>	<u>Discharge Limitations⁽¹⁾</u>	<u>Sampling Frequency</u>	<u>Sample Type</u>
<u>Flow</u>			Continuous
a.) Groundwater Remediation	2500 GPD, Daily Maximum		
<u>Pollutants</u>	<u>Discharge Limit</u>		
624	0.100 mg/L (Sum of all EPA 624 cmpds.)	Semi-Annual	24C(2)
Antimony	0.1 mg/L	Monthly	24C
Boron	4.0 mg/L	Monthly	24C
Chromium	5.33 mg/L	Monthly	24C
Cyanide (T)	2.0 mg/L	Monthly	24C
Total Phenolics (4AAP)	Surveillance Only	Monthly	
Total Suspended Solids	300 mg/L	Monthly	24C

These Limitations shall be effective immediately.

Notes:

- (1) All other limitations as set forth in the District's Sewer Use Law shall also apply.
- (2) 24-hour composite samples for volatile (624) organics to consist of a minimum of four (4) grabs within a 24-hour period. (See Sampling Measurement & Analytical Guidelines, Section 9, Paragraph 2.)
- (3) Pesticides shall be analyzed by Method 608.

PART II - SPECIAL CONDITIONS/COMPLIANCE SCHEDULE

1. Compliance Schedules: If additional pretreatment and/or operation and maintenance are required to meet discharge limitation and/or Pretreatment Regulations, the User will immediately advise District of the shortest schedule by which the User will provide such additional pretreatment or reduction in flow discharged. The completion date in this schedule shall not be later than the compliance date established for any applicable Pretreatment Regulations.

PART III - REPORTING REQUIREMENTS

1. The Industrial User shall notify the District immediately upon any accidental or slug discharge to the sanitary sewer system. Formal written notification discussing circumstances of the event and remedies to prevent recurrence shall be submitted to the District within 3 days of occurrence.
2. The Industrial User shall notify the District and apply for a revised permit 30 days prior to the introduction of new wastewater or pollutants or any substantial change in the volume or characteristics of the wastewater being introduced into the POTW from the User's industrial processes.
3. Any upset experienced by the Industrial User of its treatment that places it in a temporary state of non-compliance with wastewater discharge limitations contained in this permit or other limitations specified in the District's Sewer Use Law shall be reported to the District within 24 hours of first awareness of the commencement of the upset. A detailed report shall be filed within 5 days.
4. Self-monitoring reports are due at the NCSD #1 office within 30 days of sampling. When reporting results, the following information shall be provided:
 - a.)
 1. The date, exact place, and time of sampling or measurements;
 2. The individual(s) who performed the sampling or measurements;
 3. The date(s) analyses were performed;
 4. The individual(s) who performed the analyses;
 5. The analytical techniques or methods used;
 6. The results of such analyses
 - b.) A copy of the original lab report(s) as provided by the certified testing lab(s), including properly completed chain(s) of custody.
 - c.) The original data from the lab report shall be transcribed into a table comparing the permit requirements to the obtained results. In cases where the permit contains requirements for daily maximum and maximum monthly average, columns for both of these shall be included in the table. When a single value applies to both daily max. and max. mo. avg. (because monitoring was only performed once during a month), separate columns shall still be included in the table, clearly indicating that the value is both the daily maximum and the monthly average.
 - d.) All daily flows obtained since the previous reporting period, as well as the maximum and average daily flow for each month.
 - e.) A certification statement as to whether the Industrial User is in compliance with the permit limitations. If the permit contains limitations for both daily max. and max. mo. avg., the statement must specify whether the User is in compliance with both limitations.
 - f.) A certification statement that all normally operated (applicable) processes were operating (and discharging) during the monitoring period. Any processes not in operation shall be cited together with a listing of pollutants which might normally be present in said process discharge.

PART III - REPORTING REQUIREMENTS (cont'd.)

5. Additional Monitoring by Permittee - If the permittee monitors any pollutants at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified herein, the results of such monitoring shall be included in the calculation and reporting of values required under Part I. Such increased frequency shall also be indicated.
6. All self-monitoring reports prepared shall be submitted to:

Frank A. Nerone, Chief Operator
Niagara County Sewer District #1 Water Pollution Control Center
7346 Liberty Drive
Niagara Falls, New York 14304
7. Signatory Requirements - All reports required by this permit shall be signed by an authorized representative of the Industrial User.
8. If sampling performed by the Industrial User indicates a violation, the Industrial User is required to repeat the sampling and analysis and submit the results to the District within thirty (30) days after becoming aware of the violation.

Additionally, applicable quality control is mandatory in cases where the Industrial User is conducting additional self-monitoring as a result of non-compliance. (See Sampling Measurement and Analytical Guidelines, Item #19 "Quality Control.")

9. Toxic Organic Management Plan - For Industrial Users who are required to monitor for Total Toxic Organics (TTO), and who are implementing a District-Approved, Toxic Organic Management Plan in lieu of this monitoring, the following certification shall be included with each self-monitoring report:

"Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation for total toxic organics, I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the control authority."

PART IV - STANDARD CONDITIONS

1. PROHIBITED DISCHARGES

The Industrial User shall comply with all the general prohibitive discharge standards.

2. INSPECTION/RIGHT-OF-ENTRY

The administrator and/or other duly authorized employees of the District, NYSDEC and/or USEPA, bearing proper credentials and identification, shall be permitted to enter all industrial properties without advance notice for the purpose of inspection, observation, measurement, sampling, monitoring, and testing in accordance with the provisions of its Sewer Use Law. The District shall also have the right to inspect and copy records pertaining to the Industry's self-monitoring procedures.

PART IV - STANDARD CONDITIONS (cont'd.)

3. RECORDS RETENTION

The Industrial User shall retain and preserve for no less than (3) years, any records, books, documents, memoranda, reports, correspondence, records of calibration and maintenance of instrumentation, recordings from continuous monitoring instrumentation, and any summaries thereof, relating to monitoring, sampling and chemical analysis made by or in behalf of the user in connection with its discharge. All records that pertain to matters that are the subject of special orders, or any other enforcement or litigation activities brought by the District, shall be retained and observed by the Industrial User until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

4. CONFIDENTIAL INFORMATION

Except for data determined to be confidential under Section 5.15 of the District's Sewer Use Law, all reports required by this permit shall be available for public inspection at the office of the Pretreatment Administrator, 7346 Liberty Drive, Niagara Falls, New York 14304.

5. DILUTION

No Industrial User shall increase the use of potable or process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

6. PROPER DISPOSAL OF PRETREATMENT SLUDGES AND SPENT CHEMICALS

The disposal of sludges and spent chemicals generated shall be done in a manner such as to prevent the pollutants from such material from entering the NCSO #1 sewer system. Said disposal shall also conform to all applicable State/Federal regulations.

7. REVOCATION OF PERMIT

The permit issued to the Industrial User by the District may be revoked when after inspection, monitoring or analysis, it is determined that the discharge of wastewater to the sanitary sewer is in violation of Federal, State, or local laws, ordinances, or regulations. Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application or any other required reporting form, shall be cause for permit revocation, revocation of sewer discharges privileges, and/or imposition of criminal penalties.

8. LIMITATION ON PERMIT TRANSFER

Wastewater discharge permits are issued to a specific user for a specific operation and are not assignable to another user or transferrable to any other location without the prior written approval of the District. Sale of a facility by a User shall obligate the purchaser to seek prior written approval of the District for continued discharge to the sewerage system.

9. PERMIT AVAILABILITY

The original signed permit must be available upon request at all times for review at the Industrial User's address stated on the first page of this permit.

PART IV - STANDARD CONDITIONS (cont'd.)

10. MODIFICATION OR REVISION OF THE PERMIT

- a. The terms and conditions of this permit may be subject to modification by the District at any time as limitations or requirements, as identified in the District Sewer Use Law, are modified or other just cause exists.
- b. This permit may also be modified to incorporate special conditions resulting from the issuance of a special order by NYSDEC or EPA.
- c. The terms and conditions may be modified as a result of EPA promulgating a new federal pretreatment standard. If a pretreatment standard or prohibition (including Schedule of Compliance specified in such pretreatment standard or prohibition) is established under Section 807 (b) of the Act for a pollutant which is present, the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in permit, this permit shall be revised or modified in accordance with such pretreatment standard or prohibition.
- d. The terms and conditions of this permit shall remain in effect until the permit is terminated or replaced by a subsequent permit.

11. DUTY TO REAPPLY

Within ninety (90) days of the expiration, the User shall reapply for reissuance of the permit. Application forms are available from the District upon request.

12. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

13. ENFORCEMENT AND PENALTIES

Any violation of Section 2 or 3 of the Niagara County Sewer Use Law (adopted January 18, 1994) is declared a violation except as otherwise provided by law. Any violation of Section 4, 5 or 6 of the Niagara County Sewer Use Law is thereby a misdemeanor except as otherwise provided by law. A User who is found to have violated any provision of the Niagara County Sewer Use Law (or permits and orders issued thereunder) and/or applicable pretreatment standards and requirements, shall be subject to applicable civil and criminal penalties including but not limited to fines not to exceed five thousand dollars (\$5,000) per violation per day for each day on which non-compliance shall occur or continue.

PART V - SPECIFIC CONDITIONS

NONE

NIAGARA COUNTY SEWER DISTRICT #1

SAMPLING MEASUREMENT AND ANALYTICAL GUIDELINES

1. Prior to implementing the self-monitoring sampling and analyses, the Industrial User must submit the following information to the District.
 - a. The name(s) and address(es) of the laboratory or laboratories proposed to perform each of the chemical analyses.
 - b. A description of the equipment and test methods proposed for the chemical analyses for each parameter.
 - c. A list of the lower level of detectability expected for each parameter.
 - d. A description of the overall recovery efficiency of the prepared sample, where applicable.
 - e. A description of the quality control procedures used by the laboratory or laboratories to ensure reliable test results.
 - f. A description of the sample collection point and sample collection procedures.
 - g. A description of the compositing technique and equipment.
 - h. A description of the sample preservation methods used for each parameter.
2. Before commencement of any sampling or flow monitoring, Niagara County Sewer District #1 Water Pollution Control Center shall be notified in writing at least seventy-two (72) hours in advance by the firm or designee. The District will give a twenty-four (24) hour verbal notification to the firm or District designee of whether split sampling will be initiated.
3. Before sampling is done, the sample points must be approved by the District.
4. All discharge lines from one (1) building, or all discharge lines from only one (1) single process must be sampled at the same time.
5. Sampling record must be used and submitted with monitoring reports. The sampling report shall contain the following minimum information:
 - a. Date of each sample day.
 - b. Exact location of sampling points - attach drawing for reference.
 - c. If done manually, time of each grab sample with sampler's initials each time.
 - d. Type of auto-sampler used. Size and type of tubing and sampling interval.
 - e. Record all physical observation (sight, smell etc.) of the discharge at start-up, during inspections and changing of samples.
 - f. Note weather conditions.
 - g. Signature of immediate sampling supervisor at the bottom of page.
6. If an auto-sampler is used, new tubing must be at least 1/4 I.D. If visibly contaminated after sampling, it must be cleaned with detergent or methanol and deionized water each day. Proper refrigeration of the sample must be maintained during entire sampling period, when necessary. The intake hose velocity must be at least 2.0 f.p.s. with a maximum lift of twenty (20) feet.
7. All sampling shall be taken at the highest velocity, greatest turbulence and center of flow.
8. All sampling must be done on normal work days. If there is a process discharge after normal working hours, sampling must continue until no further discharge.
9. "COMPOSITE SAMPLE" "Composite" shall mean a combination of individual (or continuously taken) samples obtained at regular intervals over the entire discharge day. The volume of each sample shall be proportional to the discharge flow rate, when possible. For a continuous discharge, a minimum of forty-eight (48) individual grab samples (at half hour intervals shall be collected and combined to constitute a twenty-four (24) hour composite sample. For intermittent discharges of less than four hours duration, grab samples shall be taken at a minimum of fifteen (15) minute intervals.

SAMPLING MEASUREMENT AND ANALYTICAL GUIDELINES (cont'd.)

Composite samples for purgeable halocarbons (Method 601/8010), purgeable aromatics (Method 602/8020), acrolein/acrylonitrile (Method 603), or volatile organics (Method 624/8240), shall be lab composited from grab samples taken at regular intervals over the entire discharge day utilizing the appropriate special sample vials and collection techniques. The number of grabs collected is dependent on the length of the sampling period, and shall be determined the following:

For a 24-hour sampling period, a minimum of four (4) grabs will be taken at regular intervals. If the collection period is 12 hours or less, a minimum of two (2) grabs shall be collected over the period. If the duration is longer than 12 hours but less than 24 hours, a minimum of one grab for every 6-hour period, or fraction thereof, shall be collected (i.e., a 14-hour period requires a minimum of three (3) grabs.)

"SPLIT SAMPLE" - must be done on site with both parties present before preservatives are added.

"DAILY" - each operating day

"DAILY MAXIMUM" - shall mean the highest allowable discharge of a pollutant and/or flow measured during any twenty-four (24) hour sampling period. For pollutants with limitations expressed in units of mass, the daily discharge is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurements, the daily discharge is calculated as the average measurement of the pollutant over the day.

"GRAB" - shall mean an individual sample which is taken from a wastestream on a one (1) time basis with no regard to the flow in the wastestream and without consideration of time.

"MONTHLY" on day each month (the same day each month) and a normal operating day (i.e. the 2nd Tuesday of each month).

"MONTHLY AVERAGE" - discharge limitation means the highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month, divided by the number of daily discharges measured during that month.

"WEEKLY" - every seventh day (the same day each week) and a normal operating day.

10. Total water consumption shall be recorded for each day's composite using the water meters. Water consumption method must be explained in report.
11. All discharges shall be flow-monitored whenever possible. If flow monitoring cannot be done, flow determination should be a best practical engineering estimate without being economically burdensome to the firm involved. Results and procedure used to determine flow must be included with the analysis report.
12. Sample Collection Techniques for Single Discharge Lines

On single discharge lines (all regulated wastes discharge through one outlet), sample collection for the required parameters will be collected according to the following:

- a. The following parameters should only be analyzed on manually taken grab samples:

pH
Temperature
Chlorine Residual
Dissolved Oxygen
Fecal Coliforms

SAMPLING MEASUREMENT AND ANALYTICAL GUIDELINES (cont'd.)

Sample Collection Techniques for Single Discharge Lines (cont'd.)

- b. The following parameters should only be analyzed on composite samples made from manually collected grab samples:

Oil and Grease
Purgeable Halocarbons (EPA 601)
Purgeable Aromatics (EPA 602)
Acrolein/Acrylonitrile (EPA 603)
Purgeables (EPA 624)

(For a 24-hour sampling period, a minimum of four (4) grabs will be taken at regular intervals when testing for the above parameters. Proper sample collection containers and techniques must be used. Where applicable, grab samples must be lab composited only.)

- c. The following parameters should be analyzed on an automatically collected composite sample or, if an auto sampler is unavailable, a manually collected composite sample:

Metals
Phenol-4AAP
BOD
Total Suspended Solids
Total Phosphorus
TKN/Ammonia
Cyanide
Base/Neutral Acids (EPA 625)
EPA Methods 604-614

(For a continuous discharge, a minimum of forty-eight (48) individual grab samples (at half-hour intervals) shall be collected and combined to constitute a twenty-four (24) hour composite sample. For intermittent discharges of less than four (4) hours duration, grab samples shall be taken at a minimum of fifteen (15) minute intervals.)

13. Sample Collection Techniques for Multiple Discharge Lines

For multiple discharge lines (all regulated wastes discharge through more than one outlet), sample collection for the required parameters will be collected according to the following:

- a. The following parameters must be analyzed separately from each discharge line's individual grab samples:

pH
Temperature
Chlorine Residual
Dissolved Oxygen
Fecal Coliforms

- b. For the following parameters, a composite made from manually collected grab samples must be used. A separate composite must be made from each discharge line. The composites from the different discharge lines cannot be combined for analysis.

Oil and Grease
Purgeable Halocarbons (EPA 601)
Purgeable Aromatics (EPA 602)
Acrolein/Acrylonitrile (EPA 603)
Purgeables (EPA 624)

(For a 24-hour sampling period, a minimum of four (4) grabs will be taken at regular intervals, from each discharge line, when testing for the above parameters. Proper sample collection containers and techniques must be used. Where applicable, grab samples must be lab composited only.)

SAMPLING MEASUREMENT AND ANALYTICAL GUIDELINES (cont'd.)

Sample Collection Techniques for Multiple Discharge Lines (cont'd.)

- c. For the following parameters, composites from each discharge line may be combined proportional to their flow only if physical flow measurement can be done.

Metals
Phenol-4AAP
BOD
Total Suspended Solids
Total Phosphorus
TKN/Ammonia
Cyanide
Base/Neutral Acids (EPA 625)
EPA Methods 604-613

(For a continuous discharge, a minimum of forty-eight (48) individual grab samples (at half-hour intervals) shall be collected from each discharge line and combined to constitute a twenty-four (24) hour composite sample. For intermittent discharges of less than four (4) hours duration, grab samples shall be taken at a minimum of fifteen (15) minute intervals.)

14. A chain of custody log sheet is required to be used for all sampling and analysis of each sample and attached to the report.
15. The handling, storage preservation and analytical procedures for each parameter shall follow Environmental Protection Agency Guidelines published in the Federal Register, pursuant to 40 CFR 136, dated October 26, 1984, or as subsequently revised.
16. The monitoring results report, sampling record(s), and chain of custody log sheet must be sent by the industry to the District and not by the consulting firm.
17. If any exemptions or changes have to be made due to unique situations, the District must be notified immediately for approval. When approved, a written explanation of the change must accompany the analysis sheet.
18. Any split samples that indicate a discrepancy of greater than 20% may be grounds for requiring resampling and analyses.
19. "QUALITY CONTROL" - All additional analyses which were run along with self-monitoring samples as a quality control measure, such as field blanks, duplicates or matrix spikes, etc., must be included in the self-monitoring report submitted to the District. Applicable quality control is mandatory in cases where the industrial user is conducting additional self-monitoring as a result of non-compliance.
20. All analyses conducted pursuant to this permit shall be performed by a laboratory certified for said analyses by the New York State Department of Health.

Frontier Chemical - Pendleton Site
March 1999

B-3 Operation, Maintenance and Monitoring Activities

Frontier Chemical - Pendleton Site
March 1999

Table B-3
Operation, Maintenance, and Monitoring Activities
Frontier Chemical - Pendleton Site
March 1999

Date	Event	Response
September 3, 1998	NCSD Monthly Sampling; Pressure Problem.	Completed; Changed 25 micro filter bag due to hole.
September 24, 1998	NCSD Monthly Sampling	Needed to do complete analysis; inspected site.
October 8, 1998	NYSDEC Site Inspection	No items to report.
October 8, 1998	NCSD Monthly Sampling	Completed.
October 29, 1998	Pressure Problems	Changed filter bags.
November 5, 1998	NCSD Monthly Sampling	Completed.
November 12, 1998	Exhaust Fan Failed.	Replaced.
December 12, 1998	Pressure Problems.	Changed filter bags.
December 4, 1998	NCSD Monthly Sampling	Completed.
January 8, 1999	NCSD Monthly Sampling; Pressure Problem.	Completed; Changed filter bag.
February 4, 1999	NCSD Monthly Sampling	Completed.

ATTACHMENT C

REPORT

**Frontier Chemical - Pendleton Site
Semi-Annual Ground Water
Monitoring Report**

Pendleton Site PRP Group

March 1999



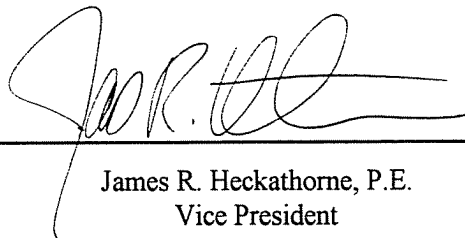
O'BRIEN & GERE
ENGINEERS, INC.

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REPORT

**Frontier Chemical - Pendleton Site
Semi-Annual Ground Water
Monitoring Report**

Pendleton Site PRP Group



James R. Heckathorne, P.E.
Vice President

March 1999



5000 Brittonfield Parkway
Syracuse, NY 13221

Contents

1. Introduction	1
1.1. Piezometer/monitoring well inspection	1
1.2. Hydraulic evaluation of capped area and collection trench ...	2
1.3. Ground water sampling and chemistry	4
2. Conclusions	9
References	11

List of Tables

1-1 Ground water analytical methods	4
1-2 Results of the t-test analysis	7

Tables located at end of report

- 1 Piezometer ground water elevation summary table
- 2 Monitoring well ground water elevation summary table
- 3 Quarry Lake surface water elevation summary table
- 4 Summary of ground water analytical data

List of Figures

- 1 Hydraulic potential map

List of Appendices

- A Piezometer/monitoring well inspection forms
- B Ground water sampling logs
- C Data validation report (Volume 1 of 3 of the validated analytical data is separately bound)

1. Introduction

This document is the second 1998/1999 Semi-Annual Ground Water Monitoring Report for the Frontier Chemical - Pendleton Site (Site), located on Town Line Road in the Town of Pendleton, Niagara County, New York. This report is prepared based on the New York State Department of Environmental Conservation (NYSDEC)-approved Operation & Maintenance (O&M) Manual for the Site (O'Brien & Gere Engineers, 1997), which addresses, among other items, long-term ground water monitoring at the Site. This Semi-Annual Ground Water Monitoring Report presents a discussion of the following:

- Piezometer/monitoring well inspection
- Hydraulic evaluation of the capped area and collection trench
- Evaluation of ground water chemistry in the intermediate and deep ground water zones.

These items are described in the following sections.

1.1. Piezometer/monitoring well inspection

The piezometer/monitoring well inspection was conducted on February 3, 1999, and included the piezometers (P-1 through P-8), standpipe (SP-1), and ground water monitoring wells (85-5R, URS-5D, 85-7R, URS-7D, URS-9I, URS-9D, 88-12C, 88-12D, URS-14I, and URS-14D) identified as the Site monitoring network in the O&M Manual for the Site.

Results of the inspection indicated that each piezometer and monitoring well was in an acceptable condition for collecting water elevation measurements and sampling. Similar maintenance issues to those identified in previous inspection reports were noted at the Site:

- Piezometer P-6 is currently angled 20 to 30 degrees from vertical.
- Monitoring wells URS-14I and URS-14D should have fill material installed around the concrete pads.

In addition, the following maintenance issues were identified during the February 3, 1999 inspection event:

- Standing water was observed in the annular space of piezometers P-2, P-6, and P-7 and monitoring wells URS-14I and URS-14D.

It should be noted that at this time these issues are not affecting the integrity of the piezometers or monitoring wells. February 1999 inspection forms are included in Appendix A.

1.2. Hydraulic evaluation of capped area and collection trench

In accordance with the O&M Manual, a complete round of static ground water elevations was collected from the piezometers (P-1 through P-8), standpipe (SP-1), and ground water monitoring wells (85-5R, URS-5D, 85-7R, URS-7D, URS-9I, URS-9D, 88-12C, 88-12D, URS-14I, and URS-14D). The ground water elevation measurements were collected on February 3, 1999. The surface water elevation of Quarry Lake was measured on February 4, 1999, by Glynn Geotechnical Engineering, Inc. The ground water elevations measured in the piezometers and standpipe, and in the monitoring wells, are summarized on Tables 1 and 2, respectively. Quarry Lake surface water elevations are summarized on Table 3. As shown on Table 3, Quarry Lake is slightly below the outlet weir elevation of 578.0 ft.

The water level measurements collected on February 3, 1999 are illustrated on Figure 1. These measurements are the sixth round collected since remedial construction was substantially completed in August 1996. The water elevation data was used to evaluate the following:

- Whether an inward hydraulic gradient exists at the site by comparing water level measurements within the capped area (P-2, P-3, P-4, P-6, and P-7) to those measured outside the capped area (P-1, P-5, P-8, SP-1, and Quarry Lake)

- The ground water flow potential inside the capped area
- Whether the ground water collection trench is effectively controlling ground water migration away from the capped area.

The data indicates that a slight outward hydraulic gradient exists in the eastern and southern portions of the capped area. The ground water elevations in piezometers P-2 and P-6 located inside the capped area are higher than the ground water elevations at piezometers P-1 and P-5, installed outside the capped area. An inward hydraulic gradient exists in the northern portion of the capped area, as the ground water elevation inside the capped area (P-7) is less than the ground water elevation outside the capped area (P-8). Along the western portion of the site, the ground water elevation at P-4 is higher than the elevation in the ground water collection trench (SP-1). The ground water elevation in piezometer P-3, installed within the center of the capped area, is greater than ground water elevations collected in piezometers P-1, P-5, and P-8, installed outside the capped area.

Although the data indicates a slight outward hydraulic gradient within the eastern and southern portions of the capped area, the ground water elevations collected in the piezometers installed within the capped area (P-2, P-3, P-4, P-6, and P-7) are lower than originally measured in June 1997. In addition, the water elevations in the piezometers installed within the capped area have decreased since the September 1998 monitoring event, with the exception of piezometer P-3. The slight fluctuations in water elevations within piezometer P-3 may be attributed to: barometric pressure changes during sampling events; the movement of water within the capped area; or the low-permeability of the materials. In addition, the water levels in the piezometers located outside the capped area (P-1, P-5, and P-8) are lower than have been previously measured, due to seasonal variations.

The contrasting fluctuations of ground water levels within and outside the capped area demonstrate that ground water within the capped area has been isolated. In addition, the ground water elevation in the standpipe (SP-1) in the ground water collection trench is less than the surface water elevation of Quarry Lake, indicating that Quarry Lake is isolated from the capped area.

Ground water elevations of piezometers installed within the capped area along the northern (P-7), western (P-4), eastern (P-2), and southern (P-6) portions of the Site are higher than the invert elevations (bottom) of the ground water collection trench. The invert elevations of the ground water collection trench vary from 568.80 ft to 563.37 ft. This information indicates that the overall hydraulic gradient is to the west toward the ground water collection trench. In summary, the data indicates that the ground water

collection trench is effectively removing shallow ground water from within the capped area.]

Amount of water to dewater the containment area

As discussed in the March 1998 monitoring report (O'Brien & Gere Engineers, 1998), based on an average daily flow rate to the ground water collection trench of 170 gallons/day and a hydraulic conductivity adjacent to the ground water collection trench of 3.3×10^{-6} cm/sec, it is estimated that approximately 110 years will be required to dewater the containment area. However, the amount of water present within the capped area and the time to dewater beneath the capped area has minimal impact on the effectiveness of the containment, since hydraulic isolation within the capped area has been established and ground water beneath the capped area is migrating towards the ground water collection trench.

1.3. Ground water sampling and chemistry

Between February 3 and 5, 1999, the fourth round of post-closure ground water samples was collected in accordance with the protocols presented in the O&M Manual. Ground water samples were obtained from the ten ground water monitoring wells identified for sampling in the O&M Manual (85-5R, URS-5D, 85-7R, URS-7D, URS-9I, URS-9D, 88-12C, 88-12D, URS-14I, and URS-14D).

Following sample collection, the ground water samples were submitted to O'Brien & Gere Laboratories, Inc., for analysis of the parameters shown in Table 1-1.

Table 1-1. Ground water analytical methods.

Parameter	Method
VOCs	USEPA Method 8260
Inorganics	USEPA Methods 6010/7470/7841
Cyanide	USEPA Method 9010
Source: O'Brien & Gere Engineers	

Ground water sampling logs and chain of custody forms are included in Appendix B.

Sampling
&
Analysis
SVOC + PCB
discontinued.

VOC's and
Metals remain

In accordance with the O&M Manual and as approved by the NYSDEC, sampling and analysis for target compound list (TCL) semi-volatile organic compounds (SVOCs) and polychlorinated biphenyls (PCBs)/pesticides were discontinued for the second through fifth years of monitoring. Sampling will be continued semi-annually for TCL volatile organic compounds (VOCs) and target analyte list (TAL) metals during the second through fifth years of monitoring. In accordance with the NYSDEC-approved O&M Manual, the required sampling frequency will be re-evaluated after the fifth year of monitoring.

Purge water generated during sampling was contained, passed through a 25-micron bag filter, and discharged to manhole MH-3. The water in manhole MH-3 was conveyed through the pre-treatment system prior to discharge to the Niagara County Sewer District (NCSD) interceptor system at manhole MH-16.

The laboratory analytical data was validated by Data Validation Services of North Creek, New York. The validation was performed in accordance with guidance from the most current editions of the United States Environmental Protection Agency (USEPA) Contract Laboratory Procedures (CLP) National Functional Guidelines for Organic and Inorganic Data Review, and the USEPA Standard Operating Procedures (SOPs) HW-2 and HW-6. Results of the validation indicated that the samples were processed and analyzed in compliance with protocol requirements, and with adherence to quality criteria. All of the analytical results are useable, although minor qualifications are needed for some of the results. A copy of the data validation report is included in Appendix C.

Results of the ground water analyses, along with a comparison of the results with New York State Class GA Standards, are summarized on Table 4. The New York State Class GA Standards presented on Table 4 have been revised to reflect revisions to the New York State water quality standards (NYSDEC, 1998). In general, the February 1999 ground water chemistry is similar to previous sampling events.

Detected constituents exceeding New York State Class GA Standards included: chromium at one location (88-12D); iron at four locations (URS-9I, 88-12C, 88-12D, and URS-14I); and sodium at ten locations (85-5R, URS-5D, 85-7R, URS-7D, URS-9I, URS-9D, 88-12C, 88-12D, URS-14I, and URS-14D). Concentrations of chromium have previously been detected in monitoring well 88-12D at concentrations slightly below the New York State Class GA Standards. In addition, chromium has previously been detected above the New York State Class GA Standards in background monitoring well URS-14I. Concentrations of iron have previously been

detected in the background wells URS-14I and URS-14D at similar concentrations. Concentrations of sodium have also been detected above the New York State Class GA Standards in background wells URS-14I and URS-14D. It is likely that the elevated concentrations of sodium are naturally occurring and are not related to previous site activities. VOCs were not detected above the New York State Class GA Standards. The data base will be updated with data from future sampling events, and ground water standards will be reviewed annually to evaluate whether standards have been revised.

*Statistical
Analyses of analytes.*

As specified in the O&M Manual, statistical analyses of the ground water chemistry data have been completed. A preliminary exploratory data analysis, using univariate statistics in SAS®, was performed for twelve analytes that have been detected a total of nine or more times in various monitoring wells since the initial post-construction sampling event in July 1997. Based on the results of the preliminary exploratory data analysis, concentrations for the twelve analytes (at $\alpha = 0.10$) do not appear to be normally distributed.

The February 1999 data represents the results of the fourth baseline data collection effort. A t-test analysis was conducted based on the data collected from the post-construction sampling events, between June 1997 and February 1999, to evaluate whether downgradient concentrations exceed upgradient concentrations, based on a comparison of downgradient wells with the appropriate upgradient wells, URS-14I or URS-14D. Table 1-2 presents a summary of locations where constituent concentrations in downgradient wells exceeded concentrations at the appropriate upgradient comparison well, at a confidence level (α) equal to 0.05.

Table 1-2. Results of the t-test analysis.

Monitoring Well	Analyte
85-5R	Calcium, Magnesium
URS-5D	Calcium, Magnesium, Sodium
85-7R	Calcium, Magnesium, Sodium
URS-7D	Magnesium, Manganese, Sodium
URS-9I	Barium, Calcium, Magnesium
88-12C	Arsenic, Calcium, Magnesium
88-12D	Calcium, Magnesium, Manganese, Potassium

Source: O'Brien & Gere Engineers

It should be noted that there are currently no New York State Class GA Standards for calcium, magnesium, or potassium. Concentrations of arsenic, barium, and manganese have not been detected above the New York State Class GA Standards during the post-construction sampling. In addition, as discussed, it is likely that elevated concentrations of sodium are naturally occurring and are not related to previous site activities.

Results of the t-test analysis also indicate that cis-1,2-dichloroethene concentrations are greater in upgradient well URS-14I than in 85-7R, at a confidence level at the statistical significance threshold of $\alpha=0.05$, and concentrations of cis-1,2-dichloroethene in 85-7R are below the New York State Class GA Standard.

Results of the t-test analysis also indicate that concentrations of iron and chromium, although detected above the New York State Class GA Standards, are not statistically higher downgradient than upgradient at the Site, indicating that the capped area is not impacting ground water.

2. Conclusions

Based on the data contained in this semi-annual report, the following conclusions are presented:

- The isolation of ground water within the capped area has been established.
- The ground water elevation data indicates that ground water within the capped area is migrating to the west toward the ground water collection trench.
- The ground water elevation data indicates that the ground water collection trench is effectively removing shallow ground water from within the capped area.
- The February 1999 ground water chemistry is similar to previous sampling events.
- Results of the t-test analysis indicate that concentrations of arsenic (88-12C), barium (URS-9I), calcium (85-5R, URS-5D, 85-7R, URS-9I, 88-12C, and 88-12D), magnesium (85-5R, URS-5D, 85-7R, URS-7D, URS-9I, 88-12C, and 88-12D), manganese (URS-7D and 88-12D), potassium (88-12D), and sodium (URS-5D, 85-7R, and URS-7D) exceed upgradient concentrations, based on a comparison of downgradient wells with the appropriate upgradient wells, URS-14I or URS-14D. There are currently no New York State Class GA Standards for calcium, magnesium, or potassium. Concentrations of arsenic, barium, and manganese have not been detected above the New York State Class GA Standards during the post-construction sampling. In addition, it is likely that elevated concentrations of sodium are naturally occurring and are not related to previous site activities.
- Results of the t-test analysis indicate that cis-1,2-dichloroethene concentrations are greater in upgradient well URS-14I than in 85-7R, at a confidence level at the statistical significance threshold of $\alpha=0.05$. Concentrations of cis-1,2-dichloroethene in 85-7R are below the New York State Class GA Standard.

References

- New York State Department of Environmental Conservation, 1998. *Title 6, Chapter X, Subchapter A, Article 2, Part 703.5, Table 1, Water Quality Standards Surface Waters and Groundwater*, March 1998.
- O'Brien & Gere Engineers, 1997. *Operation and Maintenance Manual, Frontier Chemical - Pendleton Site, Town of Pendleton, Niagara County, New York*, Pendleton Site PRP Group, March 1997.
- O'Brien & Gere Engineers, 1998. *Frontier Chemical - Pendleton Site, Semi-Annual Ground Water Monitoring Report*, Pendleton Site PRP Group, March 1998.

TABLE I

TABLE II

TABLE III

TABLE IV

Table 1
Frontier Chemical - Pendleton Site
Piezometer Ground Water Elevation Summary Table

Piezometer	Location	Top of Riser Elev. (ft)	Top of Cover Elev. (ft)	Depth (ft below riser)	Screened Elev. (ft)	Ground water elevation (ft)					
						6/24/97	9/30/97	2/23/98	4/28/98	9/17/98	2/3/99
P-1	(O) East portion of	583.21	583.30	16.4	576.8 - 566.8	579.54	577.09	579.25	579.60	575.62	572.97
P-2	(I) capped area	582.90	583.20	15.7	577.2 - 567.2	579.60	579.24	578.20	578.37	578.76	576.96
P-3	(I) Center of capped area	606.33	606.64	39.7	586.6 - 566.6	580.36	580.38	580.06	579.94	579.80	579.96
P-4 SP-1	(I) Adjacent to (T) Quarry Lake	582.31 579.86	583.85 580.07	15.6 15.0	576.7 - 566.7 bop = 564.9	577.15 <564.9	577.43 <564.9	576.70 <564.9	575.11 <564.9	575.96 <564.9	574.58 <564.9
P-5	(O) Southern portion	583.05	583.55	15.5	577.6 - 567.6	576.87	577.25	578.57	579.31	576.13	574.70
P-6	(I) of capped area	584.45	584.60	16.2	578.3 - 568.3	578.77	579.17	578.14	578.20	578.63	577.94
P-7	(I) Northern portion	580.97	582.00	15.9	575.0 - 565.0	578.33	578.62	576.45	576.17	577.15	574.43
P-8	(O) of capped area	582.83	583.00	17.3	575.5 - 565.5	577.76	578.87	578.75	579.61	576.90	574.72

Notes:

1. Elevation based on USGS Datum.
2. bop = bottom of pipe.
3. O = piezometer located outside of capped area.
4. I = piezometer located inside capped area.
5. T = standpipe located within the ground water collection trench.
6. The top of riser of piezometer P-4 was modified on 4/28/98 from 583.68 ft to 582.31 ft to allow clearance for the installation of a locking expansion plug beneath the flush-mounted cover.
7. The top of riser of piezometer P-7 was modified on 4/28/98 from 581.84 ft to 580.97 ft to allow clearance for the installation of a locking expansion plug beneath the flush-mounted cover.

Table 2
Frontier Chemical - Pendleton Site
Monitoring Well Ground Water Elevation Summary Table

Monitoring Well	Location	Top of Riser Elev. (ft)	Ground Elev. (ft)	Depth (ft below riser)	Screened Elev. (ft)	Ground water elevation (ft)					
						6/24/97	9/30/97	2/23/98	4/28/98	9/17/98	2/3/99
URS-14I	Upgradient well nest	581.14	580.84	31.0	550.1 - 555.1	577.15	578.77	580.24	580.14	574.76	577.35
URS-14D	in church parking lot	580.71	580.85	41.5	539.2 - 544.2	575.50	574.28	575.87	576.05	573.94	572.89
URS-9I	Southern well nest	581.68	579.90	46.0	535.6 - 540.6	575.38	574.22	575.69	575.91	573.76	572.67
URS-9D	along Town Line Road	580.80	579.00	46.5	534.3 - 539.3	575.36	574.21	575.68	575.89	573.64	572.66
85-5R	Middle well nest	580.84	578.70	40.0	540.9 - 542.9	574.70	573.97	575.39	575.70	574.98	572.78
URS-5D	along Town Line Road	580.60	578.00	49.9	530.8 - 535.8	574.73	574.02	575.42	575.74	573.80	572.12
85-7R	North well nest	577.90	576.60	27.8	550.2 - 552.2	575.09	574.21	575.53	575.87	573.74	572.30
URS-7D	along Town Line Road	579.35	576.50	39.9	539.5 - 544.5	575.15	574.35	575.60	575.99	573.75	572.40
88-12C	Well nest outside northeast	583.12	583.70	31.3	551.8 - 553.8	576.60	574.03	576.53	577.06	572.79	571.72
88-12D	portion of capped area	582.87	583.28	54.5	528.4 - 533.4	575.72	574.54	576.17	576.33	574.00	572.97

Notes:

1. Elevation based on USGS Datum.

Table 3
Frontier Chemical - Pendleton Site
Quarry Lake Surface Water Elevation Summary Table

Date	Quarry Lake Surface Water Elevation (ft)
9/8/97	572.3
2/23/98	578.0
4/30/98	578.26
9/21/98	577.42
2/4/99	577.97

Notes:

1. Elevation based on USGS Datum.

Table 4
Frontier Chemical-Pendleton Site
Summary of Ground Water Analytical Data
February 1999

Parameter	Standard ug/L (ppb)	85-5R							
		7/86	8/90	2/91	10/92	6/97	2/98	9/98	2/99
VOCs (ppb)									
Acetone	---	NA	R	ND	ND	ND	ND	ND	ND
Benzene	1	ND	15	ND	ND	ND	0.34 J	ND	ND
2-Butanone	---	NA	ND	ND	ND	ND	ND	ND	ND
Bromodichloromethane	---	ND	ND	ND	ND	ND	ND	ND	ND
Carbon Disulfide	---	NA	ND	ND	ND	ND	ND	ND	ND
Chlorobenzene	5	ND	NA	NA	NA	ND	0.28 J	ND	ND
Chloroform	7	ND	ND	ND	ND	ND	ND	ND	ND
Dibromochloromethane	---	ND	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	5	ND	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloroethene	5	NA	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	5	ND	ND	ND	ND	ND	0.24 J	ND	ND
Methylene Chloride	5	ND	ND	ND	ND	ND	ND	ND	ND
4-Methyl-2-Pentanone	---	NA	2J	ND	ND	ND	ND	ND	ND
1,1,2,2,-Tetrachloroethane	5	ND	2J	ND	ND	ND	ND	ND	ND
Toluene	5	ND	ND	ND	ND	ND	0.14 J	ND	ND
Total Xylenes	5	NA	ND	ND	ND	ND	0.96	ND	ND
Trichloroethene	5	ND	ND	ND	ND	ND	ND	ND	ND
Vinyl Chloride	2	ND	ND	ND	ND	ND	ND	ND	ND
Metals (ppb)									
Aluminum	---	1,060	214	37.8B	153	ND	300	ND	ND
Antimony	3	NA	ND	42.4B	ND	ND	ND	ND	ND
Arsenic	25	NA	1B	ND	ND	ND	ND	ND	ND
Barium	1000	20	73.5B	23.4B	15	40	80	50J	ND
Beryllium	---	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	5	5	ND	ND	ND	ND	ND	ND	ND
Calcium	---	380,000	355,000	378,000	321,000	270,000	220,000	220,000	130,000
Chromium	50	40	7.5B	ND	ND	ND	30	10	ND
Cobalt	---	20	ND	ND	ND	ND	ND	ND	ND
Copper	200	10	ND	ND	11	ND	ND	ND	ND
Cyanide	200	ND	ND	ND	ND	ND	ND	ND	ND
Iron	300	1,020	669	915	419	140	2,300	190	ND
Lead	25	150	ND	1.2B	ND	ND	ND	ND	ND
Magnesium	---	179,000	106,000	170,000	139,000	130,000	85,000	110,000	59,000
Manganese	300	100	40	57.5	42	50	260	40	ND
Nickel	100	10	48.1	ND	ND	ND	ND	ND	ND
Potassium	---	9,500	60,700	6,280	6,400	ND	ND	ND	ND
Selenium	10	NA	ND	ND	ND	ND	ND	ND	ND
Silver	50	30	ND	ND	ND	ND	ND	ND	ND
Sodium	20,000	126,000	132,000	120,000	100,000	93,000 J	58,000	87,000	52,000
Thallium	---	NA	ND	ND	ND	ND	8	ND	ND
Vanadium	---	35	4B	ND	ND	ND	ND	ND	ND
Zinc	---	75	12.9B	17.6B	ND	ND	ND	ND	ND

Notes:

1. R = Indicates compound rejected due to blank contamination.
2. J = Indicates result is less than sample quantitation limit but greater than zero.
3. B = Indicates compound is less than quantitation limits but greater than or equal to instrument detection limits.
4. E = Estimated value due to interferences.
5. W = Post-digestion spike is out of control limits.
6. Sample data presented for 6/97, 2/98, 9/98, and 2/99 sampling events is for cis-1,2-dichloroethene.
7. NA = Not analyzed; ND = Not detected; N = Tentative.
8. Data validation was performed in accordance with USEPA CLP National Functional Guidelines for Organic and Inorganic Data Review, and the USEPA SOPs HW-2 and HW-6.

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Table 4
Frontier Chemical-Pendleton Site
Summary of Ground Water Analytical Data
February 1999

Parameter	Standard	URS-5D						
	ug/L (ppb)	8/90	2/91	10/92	6/97	2/98	9/98	2/99
VOCs (ppb)								
Acetone	---	250	R	ND	ND	ND	ND	ND
Benzene	1	ND	ND	1	ND	0.25 J	0.11 J	ND
2-Butanone	---	ND	R	ND	ND	ND	ND	ND
Bromodichloromethane	---	ND	ND	ND	ND	ND	ND	ND
Carbon Disulfide	---	ND	ND	ND	ND	ND	ND	ND
Chlorobenzene	5	NA	NA	NA	ND	0.31 J	ND	ND
Chloroform	7	ND	ND	ND	ND	ND	ND	ND
Dibromochloromethane	---	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	5	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloroethene	5	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	5	ND	ND	ND	ND	0.32 J	ND	ND
Methylene Chloride	5	ND	R	ND	ND	ND	ND	ND
4-Methyl-2-Pentanone	---	ND	ND	ND	ND	ND	ND	ND
1,1,2,2,-Tetrachloroethane	5	ND	ND	ND	ND	ND	ND	ND
Toluene	5	ND	1J	ND	ND	0.19 J	ND	ND
Total Xylenes	5	ND	0.5J	ND	ND	1.5	ND	ND
Trichloroethene	5	ND	ND	ND	ND	ND	ND	ND
Vinyl Chloride	2	ND	ND	ND	ND	ND	ND	ND
Metals (ppb)								
Aluminum	---	ND	ND	ND	ND	ND	ND	ND
Antimony	3	ND	31.5B	ND	ND	ND	ND	ND
Arsenic	25	1.3B	1B	ND	ND	ND	ND	ND
Barium	1000	224	71.7B	32	20	ND	ND	ND
Beryllium	---	ND	ND	ND	ND	ND	ND	ND
Cadmium	5	ND	ND	ND	ND	ND	ND	ND
Calcium	---	378,000	407,000	387,000	440,000	300,000	490,000	510,000
Chromium	50	3B	ND	ND	ND	ND	ND	ND
Cobalt	---	ND	ND	ND	ND	61	210	850
Copper	200	ND	ND	8	ND	ND	ND	ND
Cyanide	200	ND	ND	ND	ND	ND	ND	ND
Iron	300	188	143	25	ND	120	ND	ND
Lead	25	ND	1.3B	12	ND	ND	ND	ND
Magnesium	---	33,300	2450B	570,000	100,000	24,000	87,000	76,000
Manganese	300	8.8B	3.5B	ND	50	10	70	70
Nickel	100	11.4B	ND	ND	90	ND	180	90
Potassium	---	22,700	16,900	8,500	ND	ND	ND	5,000
Selenium	10	ND	ND	ND	ND	ND	ND	ND
Silver	50	ND	ND	ND	ND	ND	ND	ND
Sodium	20,000	192,000	194,000	114,000	88,000	93,000	94,000	120,000
Thallium	---	ND	ND	ND	ND	ND	ND	ND
Vanadium	---	3.8B	ND	ND	ND	ND	ND	ND
Zinc	---	19.9B	14.7B	ND	ND	10	ND	ND

Notes:

1. R = Indicates compound rejected due to blank contamination.
2. J = Indicates result is less than sample quantitation limit but greater than zero.
3. B = Indicates compound is less than quantitation limits but greater than or equal to instrument detection limits.
4. E = Estimated value due to interferences.
5. W = Post-digestion spike is out of control limits.
6. Sample data presented for 6/97, 2/98, 9/98, and 2/99 sampling events is for cis-1,2-dichloroethene.
7. NA = Not analyzed; ND = Not detected; N = Tentative.
8. Data validation was performed in accordance with USEPA CLP National Functional Guidelines for Organic and Inorganic Data Review, and the USEPA SOPs HW-2 and HW-6.

Table 4
Frontier Chemical-Pendleton Site
Summary of Ground Water Analytical Data
February 1999

Parameter	Standard	85-7R							
	ug/L (ppb)	7/86	8/90	2/91	10/92	6/97	2/98	9/98	2/99
VOCs (ppb)									
Acetone	---	NA	ND	R	ND	ND	ND	ND	ND
Benzene	1	ND	6	ND	ND	ND	ND	ND	ND
2-Butanone	---	NA	ND	ND	ND	ND	ND	ND	ND
Bromodichloromethane	---	ND	ND	ND	ND	ND	ND	ND	ND
Carbon Disulfide	---	71	ND	ND	ND	ND	ND	ND	0.93 J
Chlorobenzene	5	ND	NA	NA	NA	ND	ND	ND	ND
Chloroform	7	ND	ND	ND	ND	ND	ND	ND	ND
Dibromochloromethane	---	ND	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	5	ND	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloroethene	5	NA	ND	ND	ND	0.14J	0.19 J	0.14 J	0.21 J
Ethylbenzene	5	ND	ND	ND	ND	ND	ND	ND	ND
Methylene Chloride	5	ND	ND	ND	ND	ND	ND	ND	ND
4-Methyl-2-Pentanone	---	NA	ND	ND	ND	ND	ND	ND	ND
1,1,2,2,-Tetrachloroethane	5	ND	ND	ND	ND	ND	ND	ND	ND
Toluene	5	ND	ND	1J	ND	ND	ND	ND	ND
Total Xylenes	5	ND	ND	ND	ND	ND	ND	ND	ND
Trichloroethene	5	ND	ND	ND	ND	ND	ND	ND	ND
Vinyl Chloride	2	ND	ND	ND	ND	ND	ND	ND	ND
Metals (ppb)									
Aluminum	---	1,200	277	265	249	ND	ND	ND	ND
Antimony	3	NA	28.3B	ND	ND	ND	ND	ND	ND
Arsenic	25	NA	1.4B	1.7B	ND	ND	ND	ND	ND
Barium	1000	30	91B	143B	106	100	80	50J	ND
Beryllium	---	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	5	5	ND	ND	ND	ND	ND	ND	ND
Calcium	---	490,000	354,000	298,000	389,000	350,000	350,000	420,000	400,000
Chromium	50	20	ND	ND	ND	ND	ND	ND	10
Cobalt	---	20	ND	ND	ND	ND	ND	ND	ND
Copper	200	10	ND	ND	8	ND	ND	ND	ND
Cyanide	200	ND	ND	ND	ND	ND	ND	ND	ND
Iron	300	920	586	820	435	190	310	270	170
Lead	25	120	ND	2.6B	ND	ND	ND	ND	ND
Magnesium	---	131,000	119,000	42,600	124,000	120,000	120,000	140,000	140,000
Manganese	300	110	40.5	31.5	30	70	80	90	80
Nickel	100	ND	7.4B	ND	ND	ND	ND	ND	ND
Potassium	---	28,000	5,540	5,770	6,700	5,000	5,000	6,000	6,000
Selenium	10	NA	ND	ND	ND	ND	ND	ND	ND
Silver	50	10	ND	ND	ND	ND	ND	ND	ND
Sodium	20,000	107,000	67,900	38,900	73,100	66,000 J	67,000	75,000	74,000
Thallium	---	NA	ND	ND	ND	ND	6	ND	ND
Vanadium	---	35	ND	ND	ND	ND	ND	ND	ND
Zinc	---	65	ND	21.5	ND	ND	ND	ND	ND

Notes:

1. R = Indicates compound rejected due to blank contamination.
2. J = Indicates result is less than sample quantitation limit but greater than zero.
3. B = Indicates compound is less than quantitation limits but greater than or equal to instrument detection limits.
4. E = Estimated value due to interferences.
5. W = Post-digestion spike is out of control limits.
6. Sample data presented for 6/97, 2/98, 9/98, and 2/99 sampling events is for cis-1,2-dichloroethene.
7. NA = Not analyzed; ND = Not detected; N = Tentative.
8. Data validation was performed in accordance with USEPA CLP National Functional Guidelines for Organic and Inorganic Data Review, and the USEPA SOPs HW-2 and HW-6.

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Table 4
Frontier Chemical-Pendleton Site
Summary of Ground Water Analytical Data
February 1999

Parameter	Standard	URS-7D						
	ug/L (ppb)	8/90	2/91	10/92	6/97	2/98	9/98	2/99
VOCs (ppb)								
Acetone	---	120	R	ND	ND	ND	61	6.0 J
Benzene	1	ND	ND	ND	ND	0.11 J	ND	ND
2-Butanone	---	ND	ND	ND	ND	ND	ND	ND
Bromodichloromethane	---	ND	ND	ND	ND	ND	ND	ND
Carbon Disulfide	---	0.5J	ND	ND	ND	ND	ND	1.3 J
Chlorobenzene	5	NA	NA	NA	ND	ND	ND	ND
Chloroform	7	ND	ND	ND	ND	ND	ND	ND
Dibromochloromethane	---	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	5	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloroethene	5	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	5	ND	ND	ND	ND	ND	ND	ND
Methylene Chloride	5	ND	ND	ND	ND	ND	ND	ND
4-Methyl-2-Pentanone	---	ND	ND	ND	ND	ND	ND	ND
1,1,2,2,-Tetrachloroethane	5	ND	ND	ND	ND	ND	ND	ND
Toluene	5	ND	ND	ND	ND	ND	ND	ND
Total Xylenes	5	ND	ND	ND	ND	0.37 J	ND	ND
Trichloroethene	5	ND	ND	ND	ND	ND	ND	ND
Vinyl Chloride	2	ND	ND	ND	ND	ND	ND	ND
Metals (ppb)								
Aluminum	---	167B	52.5B	ND	ND	ND	ND	ND
Antimony	3	20.5B	36.3B	ND	ND	ND	ND	ND
Arsenic	25	ND	ND	ND	ND	ND	ND	ND
Barium	1000	20.3B	47.2B	29	30	40	ND	ND
Beryllium	---	ND	ND	ND	ND	ND	ND	ND
Cadmium	5	ND	ND	ND	ND	ND	ND	ND
Calcium	---	277,000	333,000	403,000	360,000	300,000	480,000	400,000
Chromium	50	ND	ND	ND	ND	ND	10	10
Cobalt	---	ND	ND	ND	ND	ND	ND	ND
Copper	200	ND	ND	8	ND	ND	ND	ND
Cyanide	200	ND	ND	ND	ND	ND	ND	ND
Iron	300	387	283	63	ND	70	ND	100
Lead	25	ND	ND	ND	ND	ND	ND	ND
Magnesium	---	96,200	115,000	140,000	120,000	89,000	140,000	130,000
Manganese	300	71.2	140	86	40	30	40	50
Nickel	100	23.5B	ND	ND	ND	ND	ND	ND
Potassium	---	5,990	8,550	8,300	5,000	ND	6,000	ND
Selenium	10	ND	ND	ND	ND	ND	ND	ND
Silver	50	ND	ND	ND	ND	ND	ND	ND
Sodium	20,000	82,700	68,900	78,900	66,000 J	54,000	79,000	74,000
Thallium	---	ND	ND	ND	ND	ND	ND	ND
Vanadium	---	4.2B	6.7B	ND	ND	ND	ND	ND
Zinc	---	5.6B	12.2B	ND	ND	ND	ND	ND

Notes:

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4. E = Estimated value due to interferences.
5. W = Post-digestion spike is out of control limits.
6. Sample data presented for 6/97, 2/98, 9/98, and 2/99 sampling events is for cis-1,2-dichloroethene.
7. NA = Not analyzed; ND = Not detected; N = Tentative.
8. Data validation was performed in accordance with USEPA CLP National Functional Guidelines for Organic and Inorganic Data Review, and the USEPA SOPs HW-2 and HW-6.

Table 4
Frontier Chemical-Pendleton Site
Summary of Ground Water Analytical Data
February 1999

Parameter	Standard	URS-91						
	ug/L (ppb)	8/90	2/91	10/92	6/97	2/98	9/98	2/99
VOCs (ppb)								
Acetone	---	R	R	ND	ND	ND	ND	ND
Benzene	1	ND	ND	ND	0.12J	0.29 J	ND	ND
2-Butanone	---	ND	2J	ND	ND	ND	ND	ND
Bromodichloromethane	---	ND	ND	ND	ND	ND	ND	ND
Carbon Disulfide	---	ND	ND	ND	ND	ND	0.13 J	ND
Chlorobenzene	5	NA	NA	NA	ND	0.20 J	ND	ND
Chloroform	7	ND	ND	ND	ND	ND	ND	ND
Dibromochloromethane	---	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	5	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloroethene	5	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	5	ND	ND	ND	ND	0.14 J	ND	ND
Methylene Chloride	5	ND	ND	ND	ND	ND	ND	ND
4-Methyl-2-Pentanone	---	ND	ND	ND	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane	5	ND	ND	ND	ND	ND	ND	ND
Toluene	5	0.7J	ND	ND	ND	0.11 J	ND	ND
Total Xylenes	5	ND	ND	ND	0.29J	0.54	ND	ND
Trichloroethene	5	ND	ND	ND	ND	ND	ND	ND
Vinyl Chloride	2	ND	ND	ND	ND	ND	ND	ND
Metals (ppb)								
Aluminum	---	221	197	110	ND	ND	ND	200
Antimony	3	ND	ND	ND	ND	ND	ND	ND
Arsenic	25	1.7B	ND	ND	ND	ND	ND	ND
Barium	1000	30.1B	22.8B	14	30	ND	ND	ND
Beryllium	---	ND	ND	ND	ND	ND	ND	ND
Cadmium	5	ND	ND	ND	ND	ND	ND	ND
Calcium	---	106,000	143,000	123	170,000	150,000	160,000	160,000
Chromium	50	8.6B	10.1	ND	ND	ND	10	10
Cobalt	---	ND	ND	ND	ND	ND	ND	ND
Copper	200	12.7B	ND	ND	ND	ND	ND	ND
Cyanide	200	ND	ND	ND	ND	ND	ND	ND
Iron	300	1,020	1,170	808	460	440	290	590
Lead	25	ND	1B	ND	ND	ND	ND	ND
Magnesium	---	54,500	71,300	63,500	70,000	69,000	77,000	70,000
Manganese	300	67.5	80	75	50	30	40	50
Nickel	100	7.6B	ND	ND	ND	ND	ND	ND
Potassium	---	3,910B	4,250B	2,900	ND	ND	ND	ND
Selenium	10	ND	ND	ND	ND	ND	ND	ND
Silver	50	ND	ND	ND	ND	ND	ND	ND
Sodium	20,000	34,500	54,000	52,400	43,000 J	45,000	49,000	39,000
Thallium	---	ND	ND	ND	ND	11	ND	ND
Vanadium	---	ND	9.6B	ND	ND	ND	ND	ND
Zinc	---	19.3B	34.6	ND	ND	ND	20	ND

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Table 4
Frontier Chemical-Pendleton Site
Summary of Ground Water Analytical Data
February 1999

Parameter	Standard	URS-9D						
	ug/L (ppb)	8/90	2/91	10/92	6/97	2/98	9/98	2/99
VOCs (ppb)								
Acetone	---	R	R	ND	ND	ND	ND	ND
Benzene	1	ND	ND	ND	ND	1.9	ND	ND
2-Butanone	---	ND	6J	ND	ND	ND	ND	ND
Bromodichloromethane	---	4J	ND	ND	ND	ND	ND	ND
Carbon Disulfide	---	ND	ND	ND	ND	ND	ND	ND
Chlorobenzene	5	NA	NA	NA	ND	0.79	ND	ND
Chloroform	7	8	ND	ND	ND	ND	ND	ND
Dibromochloromethane	---	1J	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	5	ND	ND	0.7	0.37J	0.34 J	0.17 J	0.16 JN
1,2-Dichloroethene	5	ND	ND	1	0.66	0.59	0.33 J	0.35 J
Ethylbenzene	5	ND	ND	ND	ND	0.44 J	ND	ND
Methylene Chloride	5	ND	ND	2	ND	ND	ND	ND
4-Methyl-2-Pentanone	---	ND	ND	ND	ND	ND	ND	ND
1,1,2,2,-Tetrachloroethane	5	ND	ND	ND	ND	ND	ND	ND
Toluene	5	0.6J	ND	ND	ND	0.51	ND	ND
Total Xylenes	5	ND	ND	ND	ND	1.8	ND	ND
Trichloroethene	5	ND	ND	0.6	0.36J	0.24 J	0.20 J	0.21 J
Vinyl Chloride	2	ND	ND	ND	0.26J	0.44 J	0.11 JN	ND
Metals (ppb)								
Aluminum	---	128	64.2B	ND	ND	ND	ND	ND
Antimony	3	ND	28B	ND	ND	ND	ND	ND
Arsenic	25	1.6B	ND	ND	ND	ND	ND	ND
Barium	1000	110B	38.2B	23	ND	ND	ND	ND
Beryllium	---	ND	ND	ND	ND	ND	ND	ND
Cadmium	5	ND	ND	ND	ND	ND	ND	ND
Calcium	---	56,500	146,000	120,000	200,000	190,000	190,000	200,000
Chromium	50	ND	ND	ND	ND	ND	10	ND
Cobalt	---	ND	ND	ND	ND	ND	ND	ND
Copper	200	5.2B	ND	ND	ND	ND	ND	ND
Cyanide	200	ND	11.1B	ND	ND	ND	ND	ND
Iron	300	127	506	252	ND	70	80	70
Lead	25	ND	ND	ND	ND	ND	ND	ND
Magnesium	---	29,900	70,200	60,000	58,000	73,000	71,000	72,000
Manganese	300	20.1	25.5	9	ND	ND	10	10
Nickel	100	15.3B	ND	ND	ND	ND	ND	ND
Potassium	---	9,880	4,170B	3,600	ND	ND	ND	ND
Selenium	10	ND	ND	ND	ND	ND	ND	ND
Silver	50	ND	ND	ND	ND	ND	ND	ND
Sodium	20,000	27,400	37,000	42,800	48,000 J	52,000	41,000	38,000
Thallium	---	ND	ND	ND	ND	14	ND	ND
Vanadium	---	10.7B	ND	ND	ND	ND	ND	ND
Zinc	---	50.5	16.7B	ND	ND	ND	ND	ND

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Table 4
Frontier Chemical-Pendleton Site
Summary of Ground Water Analytical Data
February 1999

Parameter	Standard	88-12C						
	ug/L (ppb)	8/90	2/91	10/92	6/97	2/98	9/98	2/99
VOCs (ppb)								
Acetone	---	ND	ND	ND	ND	ND	ND	ND
Benzene	1	ND	ND	ND	ND	ND	ND	ND
2-Butanone	---	ND	ND	ND	ND	ND	ND	ND
Bromodichloromethane	---	ND	ND	ND	ND	ND	ND	ND
Carbon Disulfide	---	ND	ND	ND	ND	ND	ND	ND
Chlorobenzene	5	NA	NA	NA	ND	ND	ND	ND
Chloroform	7	ND	ND	ND	ND	ND	ND	ND
Dibromochloromethane	---	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	5	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloroethene	5	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	5	ND	ND	ND	ND	ND	ND	ND
Methylene Chloride	5	ND	ND	ND	ND	ND	ND	ND
4-Methyl-2-Pentanone	---	ND	ND	ND	ND	ND	ND	ND
1,1,2,2,-Tetrachloroethane	5	ND	ND	ND	ND	ND	ND	ND
Toluene	5	ND	ND	ND	ND	ND	ND	ND
Total Xylenes	5	ND	ND	ND	ND	ND	ND	ND
Trichloroethene	5	ND	ND	ND	ND	ND	ND	ND
Vinyl Chloride	2	ND	ND	ND	ND	ND	ND	ND
Metals (ppb)								
Aluminum	---	481	187B	453	ND	900	ND	600
Antimony	3	19.2B	28B	ND	ND	ND	ND	ND
Arsenic	25	10	12.3B	14	9	7	10	12
Barium	1000	11.4B	17.3	14	ND	ND	ND	ND
Beryllium	---	ND	ND	ND	ND	ND	ND	ND
Cadmium	5	ND	ND	ND	ND	ND	ND	ND
Calcium	---	62,600	68,500	68,900	73,000	70,000	71,000	76,000
Chromium	50	21	4.6B	ND	ND	10	10	20
Cobalt	---	ND	ND	ND	ND	ND	ND	ND
Copper	200	4.2B	ND	5	ND	ND	ND	ND
Cyanide	200	ND	ND	ND	ND	ND	ND	ND
Iron	300	1,530	1,040	1,560	ND	2,200	330	1,600
Lead	25	1.5B	1.2B	ND	ND	ND	ND	ND
Magnesium	---	88,500	103,000	92,500	110,000	98,000	110,000	100,000
Manganese	300	45.4	37.8	54	10	70	10	40
Nickel	100	14.6B	ND	ND	ND	ND	ND	ND
Potassium	---	2,520B	3,200B	3,000	ND	ND	ND	ND
Selenium	10	ND	ND	ND	ND	ND	ND	ND
Silver	50	ND	ND	ND	ND	ND	ND	ND
Sodium	20,000	34,600	41,100	41,300	47,000 J	43,000	40,000	42,000
Thallium	---	ND	ND	ND	ND	13	ND	ND
Vanadium	---	22.1B	10B	ND	ND	ND	ND	ND
Zinc	---	10.1B	15.7B	ND	20	20	ND	ND

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Table 4
Frontier Chemical-Pendleton Site
Summary of Ground Water Analytical Data
February 1999

Parameter	Standard	88-12D					
	ug/L (ppb)	8/90	2/91	6/97	2/98	9/98	2/99
VOCs (ppb)							
Acetone	---	ND	ND	ND	ND	ND	ND
Benzene	1	1J	0.9J	ND	0.13 J	0.13 J	ND
2-Butanone	---	ND	ND	ND	ND	ND	ND
Bromodichloromethane	---	ND	ND	ND	ND	ND	ND
Carbon Disulfide	---	ND	6	ND	ND	0.56	0.70 J
Chlorobenzene	5	ND	ND	ND	ND	ND	ND
Chloroform	7	ND	ND	ND	ND	ND	ND
Dibromochloromethane	---	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	5	ND	ND	ND	ND	ND	ND
1,2-Dichloroethene	5	ND	2J	ND	ND	ND	ND
Ethylbenzene	5	ND	ND	ND	0.11 J	ND	ND
Methylene Chloride	5	ND	ND	ND	ND	ND	ND
4-Methyl-2-Pentanone	---	ND	ND	ND	ND	ND	ND
1,1,2,2,-Tetrachloroethane	5	ND	ND	ND	ND	ND	ND
Toluene	5	R	13	ND	ND	ND	ND
Total Xylenes	5	ND	ND	ND	0.48 J	ND	ND
Trichloroethene	5	ND	6	ND	ND	ND	ND
Vinyl Chloride	2	ND	ND	ND	ND	ND	ND
Metals (ppb)							
Aluminum	---	ND	172B	ND	ND	ND	ND
Antimony	3	50.7B	56.1B	ND	ND	ND	ND
Arsenic	25	ND	1.3BW	ND	ND	ND	ND
Barium	1000	2.9B	7.9B	ND	ND	ND	ND
Beryllium	---	ND	ND	ND	ND	ND	ND
Cadmium	5	ND	ND	ND	ND	ND	ND
Calcium	---	464,000	623,000E	490,000	480,000	630,000	630,000
Chromium	50	7.6B	27.8E	10	30	30	90
Cobalt	---	ND	ND	ND	ND	ND	ND
Copper	200	ND	ND	ND	ND	ND	ND
Cyanide	200	ND	ND	ND	ND	ND	ND
Iron	300	168	250	180	480	110	650
Lead	25	ND	1.8BW	ND	ND	ND	ND
Magnesium	---	109,000	199,000E	130,000	110,000	180,000	160,000
Manganese	300	33.9	696	90	60	40	50
Nickel	100	11.5B	25.5B	ND	ND	ND	70
Potassium	---	5,310	12,000E	600	6,000	10,000	9,000
Selenium	10	ND	ND	ND	ND	6	ND
Silver	50	ND	ND	ND	ND	ND	ND
Sodium	20,000	66,400	474,000	140,000 J	100,000	330,000	250,000
Thallium	---	ND	ND	ND	ND	ND	ND
Vanadium	---	51.6	2.4B	ND	ND	ND	ND
Zinc	---	7.9B	ND	ND	10	ND	ND

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Table 4
Frontier Chemical-Pendleton Site
Summary of Ground Water Analytical Data
February 1999

Parameter	Standard	URS-14I					
	ug/L (ppb)	2/91	10/92	6/97	2/98	9/98	2/99
VOCs (ppb)							
Acetone	---	ND	ND	ND	ND	ND	ND
Benzene	1	ND	ND	ND	1	ND	ND
2-Butanone	---	ND	ND	ND	ND	ND	ND
Bromodichloromethane	---	ND	ND	ND	ND	ND	ND
Carbon Disulfide	---	ND	ND	ND	ND	ND	ND
Chlorobenzene	5	NA	NA	ND	0.81	ND	ND
Chloroform	7	ND	ND	ND	ND	ND	ND
Dibromochloromethane	---	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	5	ND	ND	ND	ND	ND	ND
1,2-Dichloroethene	5	ND	ND	ND	ND	ND	ND
Ethylbenzene	5	ND	ND	ND	0.13 J	ND	ND
Methylene Chloride	5	ND	ND	ND	ND	ND	ND
4-Methyl-2-Pentanone	---	ND	ND	ND	ND	ND	ND
1,1,2,2,-Tetrachloroethane	5	ND	ND	ND	ND	ND	ND
Toluene	5	ND	ND	ND	0.15 J	ND	ND
Total Xylenes	5	ND	ND	ND	ND	ND	ND
Trichloroethene	5	ND	ND	ND	ND	ND	ND
Vinyl Chloride	2	ND	ND	ND	ND	ND	ND
Metals (ppb)							
Aluminum	---	7,140	1,170	1300	400	ND	300
Antimony	3	ND	ND	ND	ND	ND	ND
Arsenic	25	7.2B	ND	ND	ND	ND	5
Barium	1000	115B	47	50	40	40J	40
Beryllium	---	1.2B	ND	ND	ND	ND	ND
Cadmium	5	ND	ND	ND	1	ND	ND
Calcium	---	73,900	35,200	28,000 J	21,000	23,000	26,000
Chromium	50	30.9	ND	ND	160	ND	ND
Cobalt	---	5.8B	ND	ND	ND	ND	ND
Copper	200	18.5B	8	ND	10	ND	ND
Cyanide	200	ND	ND	ND	ND	ND	ND
Iron	300	10,400	2,060	1,800	2,300	ND	320
Lead	25	7.5	ND	ND	ND	ND	ND
Magnesium	---	32,800	22,300	21,000	17,000	21,000	23,000
Manganese	300	484	145	70	60	ND	ND
Nickel	100	30.4B	ND	ND	170	ND	ND
Potassium	---	17,100	5,500	ND	25,000	8,000	6,000
Selenium	10	ND	ND	ND	ND	ND	ND
Silver	50	ND	ND	ND	ND	ND	ND
Sodium	20,000	44,700	42,500	58,000 J	48,000	48,000	54,000
Thallium	---	ND	ND	ND	6	ND	ND
Vanadium	---	16.1B	ND	ND	ND	ND	ND
Zinc	---	52.3	ND	10	30	ND	ND

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Table 4
Frontier Chemical-Pendleton Site
Summary of Ground Water Analytical Data
February 1999

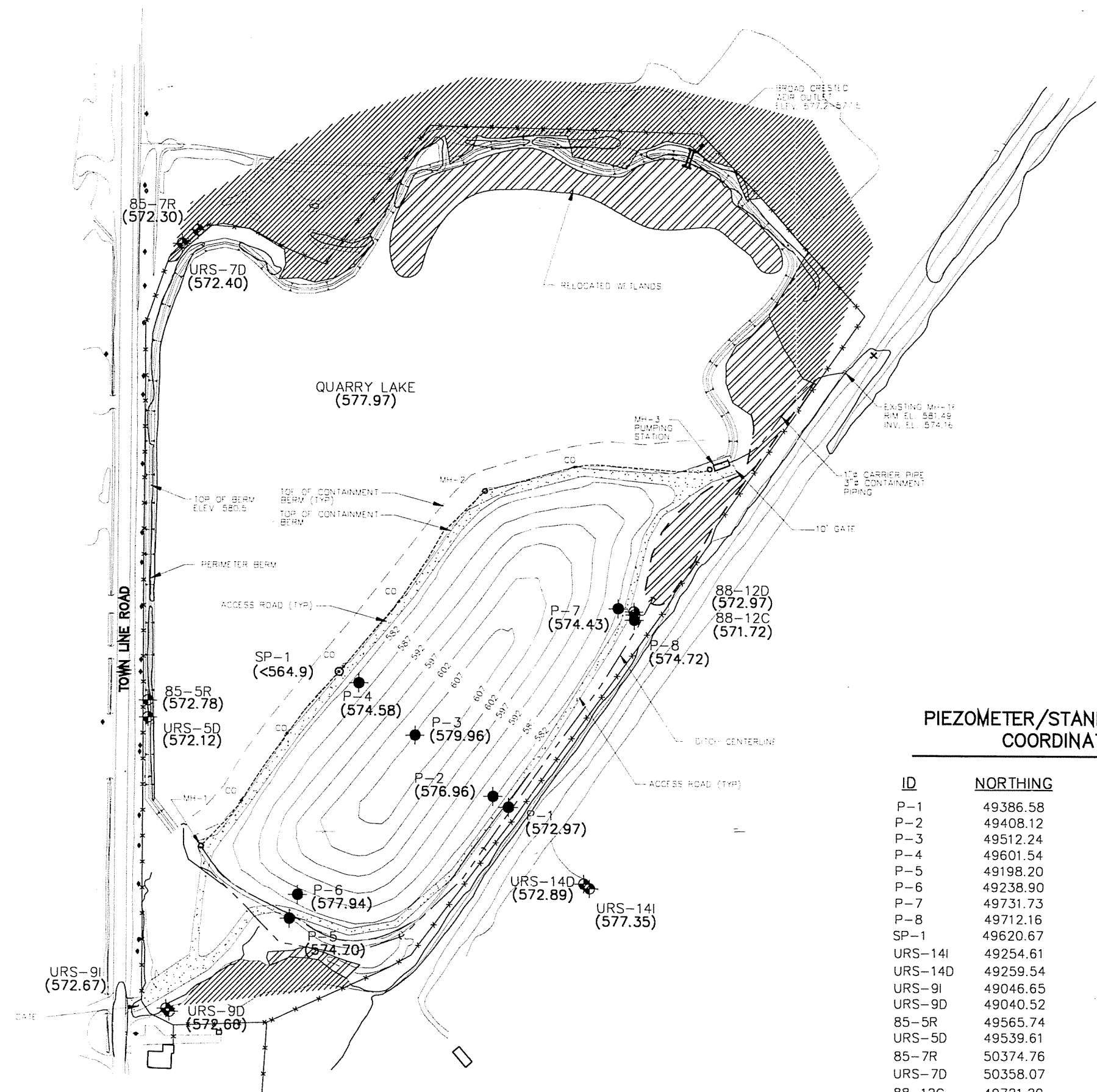
Parameter	Standard	URS-14D					
	ug/L (ppb)	2/91	10/92	6/97	2/98	9/98	2/99
VOCs (ppb)							
Acetone	---	ND	ND	ND	ND	ND	ND
Benzene	1	ND	ND	ND	ND	ND	ND
2-Butanone	---	ND	ND	ND	ND	ND	ND
Bromodichloromethane	---	ND	ND	ND	ND	ND	ND
Carbon Disulfide	---	ND	ND	ND	ND	0.47 J	1.1 J
Chlorobenzene	5	NA	NA	ND	ND	ND	ND
Chloroform	7	ND	ND	ND	ND	ND	ND
Dibromochloromethane	---	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	5	ND	ND	ND	ND	ND	ND
1,2-Dichloroethene	5	ND	ND	ND	ND	ND	ND
Ethylbenzene	5	ND	ND	ND	ND	ND	ND
Methylene Chloride	5	R	ND	ND	ND	ND	ND
4-Methyl-2-Pentanone	---	ND	ND	ND	ND	ND	ND
1,1,2,2,-Tetrachloroethane	5	ND	ND	ND	ND	ND	ND
Toluene	5	ND	ND	ND	ND	ND	ND
Total Xylenes	5	ND	ND	0.11J	0.21 J	ND	ND
Trichloroethene	5	ND	ND	ND	ND	ND	ND
Vinyl Chloride	2	ND	ND	ND	ND	ND	ND
Metals (ppb)							
Aluminum	---	99.8	ND	ND	ND	ND	ND
Antimony	3	32.1B	ND	ND	ND	ND	ND
Arsenic	25	2B	ND	ND	ND	ND	ND
Barium	1000	25.5B	23	20	ND	ND	40
Beryllium	---	ND	ND	ND	ND	ND	ND
Cadmium	5	ND	ND	ND	ND	ND	ND
Calcium	---	255,000	292,000	210,000	250,000	310,000	280,000
Chromium	50	10.3	7	ND	ND	10	ND
Cobalt	---	ND	ND	ND	ND	ND	ND
Copper	200	ND	8	ND	ND	ND	ND
Cyanide	200	ND	ND	ND	10	10	ND
Iron	300	357	193	ND	ND	ND	80
Lead	25	1.1B	ND	ND	ND	ND	ND
Magnesium	---	75,200	78,000	61,000	66,000	81,000	71,000
Manganese	300	30.8	27	ND	ND	ND	ND
Nickel	100	ND	ND	ND	ND	ND	ND
Potassium	---	4,250B	3,700	ND	ND	ND	ND
Selenium	10	ND	ND	ND	ND	ND	ND
Silver	50	ND	ND	ND	ND	ND	ND
Sodium	20,000	40,700	38,700	52,000 J	49,000	50,000	48,000
Thallium	---	ND	ND	ND	ND	ND	ND
Vanadium	---	ND	ND	ND	ND	ND	ND
Zinc	---	26.8	ND	ND	10	10	ND

Notes:

1. R = Indicates compound rejected due to blank contamination.
2. J = Indicates result is less than sample quantitation limit but greater than zero.
3. B = Indicates compound is less than quantitation limits but greater than or equal to instrument detection limits.
4. E = Estimated value due to interferences.
5. W = Post-digestion spike is out of control limits.
6. Sample data presented for 6/97, 2/98, 9/98, and 2/99 sampling events is for cis-1,2-dichloroethene.
7. NA = Not analyzed; ND = Not detected; N = Tentative.
8. Data validation was performed in accordance with USEPA CLP National Functional Guidelines for Organic and Inorganic Data Review, and the USEPA SOPs HW-2 and HW-6.

i:\div71\5829\22038\4\9.wb2

FIGURES




PIEZOMETER/STANDPIPE AND MONITORING WELL
COORDINATES AND ELEVATIONS

ID	NORTHING	EASTING	RISER	COVER
P-1	49386.58	100656.87	583.21	583.30
P-2	49408.12	100630.30	582.90	583.20
P-3	49512.24	100496.39	606.33	606.64
P-4	49601.54	100399.33	582.31*	583.85
P-5	49198.20	100282.65	583.05	583.55
P-6	49238.90	100296.52	584.45	584.60
P-7	49731.73	100842.30	580.97*	582.00
P-8	49712.16	100869.82	582.83	583.00
SP-1	49620.67	100365.59	579.86	580.07
URS-14I	49254.61	100794.43	581.14	580.84
URS-14D	49259.54	100789.09	580.71	580.85
URS-9I	49046.65	100075.10	581.68	579.90
URS-9D	49040.52	100076.81	580.80	579.00
85-5R	49565.74	100036.14	580.84	578.70
URS-5D	49539.61	100035.69	580.60	578.00
85-7R	50374.76	100115.55	577.90	576.60
URS-7D	50358.07	100095.40	579.35	576.50
88-12C	49721.29	100870.45	583.12	583.70
88-12D	49726.43	100869.13	582.87	583.28

NOTE: * = MODIFIED 4/28/98

REV DATE: 3/11/99

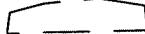
FIGURE 1





LEGEND

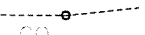
URS-7D
P-1
(579.61)


MONITORING WELL
PIEZOMETER
WATER ELEVATION


 WETLAND AREA

 6' HIGH CHAIN LINK FENCE

 GRADE ELEVATION CONTOUR

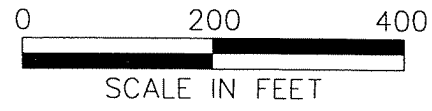
 GROUND WATER COLLECTION TRENCH & CLEAN OUT

 STANDPIPE

 UTILITY POLE

FRONTIER CHEMICAL
PENDLETON SITE
TOWN OF PENDLETON,
NIAGARA COUNTY, NY

HYDRAULIC POTENTIAL
MAP (FEBRUARY 3, 1999)



SCALE IN FEET
DATE: MARCH 1999
FILE NO. 5829.22038.001



Appendix A

Piezometer/monitoring well inspection forms

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: P-1

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings

Above Ground

Flush Mounted

Well Construction

PVC

Stainless Steel

Well Diameter

2-inch

4- inch

Depth to Ground Water

10.24

Well Depth

16.28

WELL INTEGRITY

1. Well identification clearly marked?
2. Well covers and locks in good condition and secure?
3. Is the well stand pipe vertically aligned and secure?
4. Is the concrete pad and surface seal in good condition?
5. Are soils surrounding the well pad eroded?
6. Is the well casing in good condition?
7. Is the measuring point on casing well marked?
8. Is there standing water in the annular space?
9. Is the standpipe vented at the base to allow drainage?

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: P-2

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings

Above Ground

Flush Mounted

Well Construction

PVC

Stainless Steel

Well Diameter

2-inch

4- inch

Depth to Ground Water

5.94

Well Depth

15.78

WELL INTEGRITY

- | | | |
|--|-----|-------|
| 1. Well identification clearly marked? | Yes | No |
| 2. Well covers and locks in good condition and secure? | Yes | No |
| 3. Is the well stand pipe vertically aligned and secure? | Yes | No |
| 4. Is the concrete pad and surface seal in good condition? | Yes | No |
| 5. Are soils surrounding the well pad eroded? | Yes | No |
| 6. Is the well casing in good condition? | Yes | No |
| 7. Is the measuring point on casing well marked? | Yes | No |
| 8. Is there standing water in the annular space? | Yes | No |
| 9. Is the standpipe vented at the base to allow drainage? | Yes | No NA |

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: P-3

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings

Above Ground

Flush Mounted

Well Construction

PVC

Stainless Steel

Well Diameter

2-inch

4-inch

Depth to Ground Water

26.37

Well Depth

39.96

WELL INTEGRITY

1. Well identification clearly marked?
2. Well covers and locks in good condition and secure?
3. Is the well stand pipe vertically aligned and secure?
4. Is the concrete pad and surface seal in good condition?
5. Are soils surrounding the well pad eroded?
6. Is the well casing in good condition?
7. Is the measuring point on casing well marked?
8. Is there standing water in the annular space?
9. Is the standpipe vented at the base to allow drainage?

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

NA

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: P-4

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings	Above Ground	Flush Mounted
Well Construction	PVC	Stainless Steel
Well Diameter	2-inch	4-inch
Depth to Ground Water	7.73	
Well Depth	16.98	

WELL INTEGRITY

- | | | |
|--|-----|-------|
| 1. Well identification clearly marked? | Yes | No |
| 2. Well covers and locks in good condition and secure? | Yes | No |
| 3. Is the well stand pipe vertically aligned and secure? | Yes | No |
| 4. Is the concrete pad and surface seal in good condition? | Yes | No |
| 5. Are soils surrounding the well pad eroded? | Yes | No |
| 6. Is the well casing in good condition? | Yes | No |
| 7. Is the measuring point on casing well marked? | Yes | No |
| 8. Is there standing water in the annular space? | Yes | No |
| 9. Is the standpipe vented at the base to allow drainage? | Yes | No NA |

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: P-5

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings

Above Ground

Flush Mounted

Well Construction

PVC

Stainless Steel

Well Diameter

2-inch

4- inch

Depth to Ground Water

8.35

Well Depth

15.6 ft

WELL INTEGRITY

1. Well identification clearly marked?
2. Well covers and locks in good condition and secure?
3. Is the well stand pipe vertically aligned and secure?
4. Is the concrete pad and surface seal in good condition?
5. Are soils surrounding the well pad eroded?
6. Is the well casing in good condition?
7. Is the measuring point on casing well marked?
8. Is there standing water in the annular space?
9. Is the standpipe vented at the base to allow drainage?

Yes	No
Yes	No
Yes	No
Yes	No
Yes	No
Yes	No
Yes	No
Yes	No
Yes	No

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: P-6

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings	Above Ground	<u>Flush Mounted</u>
Well Construction	<u>PVC</u>	Stainless Steel
Well Diameter	<u>2-inch</u>	4- inch
Depth to Ground Water	<u>6.51</u>	
Well Depth	<u>16.23</u>	

WELL INTEGRITY

1. Well identification clearly marked?
2. Well covers and locks in good condition and secure?
3. Is the well stand pipe vertically aligned and secure?
4. Is the concrete pad and surface seal in good condition?
5. Are soils surrounding the well pad eroded?
6. Is the well casing in good condition?
7. Is the measuring point on casing well marked?
8. Is there standing water in the annular space?
9. Is the standpipe vented at the base to allow drainage?

Yes

No

Yes

No

No

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

Yes

No Very little
in flush mount cover.
No ← NA

Comments:

* Standpipe at surface is leaning 20°-30°

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: P-7

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings	Above Ground	Flush Mounted
Well Construction	PVC	Stainless Steel
Well Diameter	2-inch	4-inch
Depth to Ground Water	6.54	
Well Depth	16.70	

WELL INTEGRITY

- | | | |
|--|-----|-------|
| 1. Well identification clearly marked? | Yes | No |
| 2. Well covers and locks in good condition and secure? | Yes | No |
| 3. Is the well stand pipe vertically aligned and secure? | Yes | No |
| 4. Is the concrete pad and surface seal in good condition? | Yes | No |
| 5. Are soils surrounding the well pad eroded? | Yes | No |
| 6. Is the well casing in good condition? | Yes | No |
| 7. Is the measuring point on casing well marked? | Yes | No |
| 8. Is there standing water in the annular space? | Yes | No |
| 9. Is the standpipe vented at the base to allow drainage? | Yes | No NA |

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: P-8

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings

Above Ground

Flush Mounted

Well Construction

PVC

Stainless Steel

Well Diameter

2-inch

4- inch

Depth to Ground Water

8.11

Well Depth

17.28

WELL INTEGRITY

- | | | |
|--|--------------------------------------|-------------------------------------|
| 1. Well identification clearly marked? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 2. Well covers and locks in good condition and secure? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 3. Is the well stand pipe vertically aligned and secure? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 4. Is the concrete pad and surface seal in good condition? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 5. Are soils surrounding the well pad eroded? | <input type="radio"/> Yes | <input checked="" type="radio"/> No |
| 6. Is the well casing in good condition? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 7. Is the measuring point on casing well marked? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 8. Is there standing water in the annular space? | <input type="radio"/> Yes | <input checked="" type="radio"/> No |
| 9. Is the standpipe vented at the base to allow drainage? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: SP-1

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings

Above Ground

Flush Mounted

Well Construction

PVC HDPE

Stainless Steel

Well Diameter

2-inch

4-inch

6-inch

Depth to Ground Water

Dry

Well Depth

15.38

WELL INTEGRITY

1. Well identification clearly marked?
2. Well covers and locks in good condition and secure?
3. Is the well stand pipe vertically aligned and secure?
4. Is the concrete pad and surface seal in good condition?
5. Are soils surrounding the well pad eroded?
6. Is the well casing in good condition?
7. Is the measuring point on casing well marked?
8. Is there standing water in the annular space?
9. Is the standpipe vented at the base to allow drainage?

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No NA

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: 85-SR

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings

Above Ground

Flush Mounted

Well Construction

PVC

~~Stainless Steel~~

Well Diameter

2-inch

4-inch

Depth to Ground Water

~~8.60~~ 8.06

Well Depth

38.05

WELL INTEGRITY

1. Well identification clearly marked?
2. Well covers and locks in good condition and secure?
3. Is the well stand pipe vertically aligned and secure?
4. Is the concrete pad and surface seal in good condition?
5. Are soils surrounding the well pad eroded?
6. Is the well casing in good condition?
7. Is the measuring point on casing well marked?
8. Is there standing water in the annular space?
9. Is the standpipe vented at the base to allow drainage?

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: URS-5A

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings

Above Ground

Flush Mounted

Well Construction

PVC

Stainless Steel

Well Diameter

2-inch

4-inch

Depth to Ground Water

8.48

Well Depth

49.93

WELL INTEGRITY

- | | | |
|--|-----|----|
| 1. Well identification clearly marked? | Yes | No |
| 2. Well covers and locks in good condition and secure? | Yes | No |
| 3. Is the well stand pipe vertically aligned and secure? | Yes | No |
| 4. Is the concrete pad and surface seal in good condition? | Yes | No |
| 5. Are soils surrounding the well pad eroded? | Yes | No |
| 6. Is the well casing in good condition? | Yes | No |
| 7. Is the measuring point on casing well marked? | Yes | No |
| 8. Is there standing water in the annular space? | Yes | No |
| 9. Is the standpipe vented at the base to allow drainage? | Yes | No |

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: 85-7R

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings	Above Ground	Flush Mounted
Well Construction	PVC	Stainless Steel
Well Diameter	2-inch	4- inch
Depth to Ground Water	5.60	
Well Depth	27.78	

WELL INTEGRITY

- | | | |
|--|-----|----|
| 1. Well identification clearly marked? | Yes | No |
| 2. Well covers and locks in good condition and secure? | Yes | No |
| 3. Is the well stand pipe vertically aligned and secure? | Yes | No |
| 4. Is the concrete pad and surface seal in good condition? | Yes | No |
| 5. Are soils surrounding the well pad eroded? | Yes | No |
| 6. Is the well casing in good condition? | Yes | No |
| 7. Is the measuring point on casing well marked? | Yes | No |
| 8. Is there standing water in the annular space? | Yes | No |
| 9. Is the standpipe vented at the base to allow drainage? | Yes | No |

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: WPS-7D

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings

Above Ground

~~Flush Mounted~~

Well Construction

PVC

Stainless Steel

Well Diameter

2-inch

4- inch

Depth to Ground Water

6.95

Well Depth

39.89

WELL INTEGRITY

1. Well identification clearly marked?
2. Well covers and locks in good condition and secure?
3. Is the well stand pipe vertically aligned and secure?
4. Is the concrete pad and surface seal in good condition?
5. Are soils surrounding the well pad eroded?
6. Is the well casing in good condition?
7. Is the measuring point on casing well marked?
8. Is there standing water in the annular space?
9. Is the standpipe vented at the base to allow drainage?

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: URS - 9I

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings

Above Ground

Flush Mounted

Well Construction

PVC

Stainless Steel

Well Diameter

2-inch

4-inch

Depth to Ground Water

9.01

Well Depth

46.40

WELL INTEGRITY

1. Well identification clearly marked?
2. Well covers and locks in good condition and secure?
3. Is the well stand pipe vertically aligned and secure?
4. Is the concrete pad and surface seal in good condition?
5. Are soils surrounding the well pad eroded?
6. Is the well casing in good condition?
7. Is the measuring point on casing well marked?
8. Is there standing water in the annular space?
9. Is the standpipe vented at the base to allow drainage?

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical
Personnel: Peter Bogardus/Chawn O'Dell

Well Identification: URS-9D
Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings

(Above Ground)

Flush Mounted

Well Construction

PVC

(Stainless Steel)

Well Diameter

(2-inch)

4- inch

Depth to Ground Water

8.14

Well Depth

50.99

WELL INTEGRITY

1. Well identification clearly marked?
2. Well covers and locks in good condition and secure?
3. Is the well stand pipe vertically aligned and secure?
4. Is the concrete pad and surface seal in good condition?
5. Are soils surrounding the well pad eroded?
6. Is the well casing in good condition?
7. Is the measuring point on casing well marked?
8. Is there standing water in the annular space?
9. Is the standpipe vented at the base to allow drainage?

(Yes)

No

(Yes)

No

(Yes)

No

(Yes)

No

Yes

(No)

(Yes)

No

(Yes)

No

Yes

(No)

(Yes)

No

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Personnel: Peter Bogardus/Chawn O'Dell

Well Identification: 88-12C

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings	<u>Above Ground</u>	Flush Mounted
Well Construction	PVC	<u>Stainless Steel</u>
Well Diameter	<u>2-inch</u>	4- inch
Depth to Ground Water	<u>11.40</u>	
Well Depth	<u>31.37</u>	

WELL INTEGRITY

- | | | |
|--|------------|-----------|
| 1. Well identification clearly marked? | <u>Yes</u> | No |
| 2. Well covers and locks in good condition and secure? | <u>Yes</u> | No |
| 3. Is the well stand pipe vertically aligned and secure? | <u>Yes</u> | No |
| 4. Is the concrete pad and surface seal in good condition? | <u>Yes</u> | No |
| 5. Are soils surrounding the well pad eroded? | Yes | <u>No</u> |
| 6. Is the well casing in good condition? | <u>Yes</u> | No |
| 7. Is the measuring point on casing well marked? | <u>Yes</u> | No |
| 8. Is there standing water in the annular space? | Yes | <u>No</u> |
| 9. Is the standpipe vented at the base to allow drainage? | <u>Yes</u> | No |

Comments:

Concrete pad under gravel.

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: 88-12D

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings

Above Ground

Flush Mounted

Well Construction

PVC

Stainless Steel

Well Diameter

2-inch

4- inch

Depth to Ground Water

9.90

Well Depth

53.36

WELL INTEGRITY

1. Well identification clearly marked?
2. Well covers and locks in good condition and secure?
3. Is the well stand pipe vertically aligned and secure?
4. Is the concrete pad and surface seal in good condition?
5. Are soils surrounding the well pad eroded?
6. Is the well casing in good condition?
7. Is the measuring point on casing well marked?
8. Is there standing water in the annular space?
9. Is the standpipe vented at the base to allow drainage?

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Yes

No

Comments:

Concrete pad under gravel.

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: URS-141

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings

~~Above Ground~~

Flush Mounted

Well Construction

PVC

Stainless Steel

Well Diameter

2-inch

4-inch

Depth to Ground Water

3.79

Well Depth

31.18

WELL INTEGRITY

- | | | |
|--|--------------------------------------|-------------------------------------|
| 1. Well identification clearly marked? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 2. Well covers and locks in good condition and secure? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 3. Is the well stand pipe vertically aligned and secure? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 4. Is the concrete pad and surface seal in good condition? | <input checked="" type="radio"/> Yes | <input checked="" type="radio"/> No |
| 5. Are soils surrounding the well pad eroded? | <input checked="" type="radio"/> Yes | <input checked="" type="radio"/> No |
| 6. Is the well casing in good condition? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 7. Is the measuring point on casing well marked? | <input checked="" type="radio"/> Yes | <input type="radio"/> No |
| 8. Is there standing water in the annular space? | <input checked="" type="radio"/> Yes | <input checked="" type="radio"/> No |
| 9. Is the standpipe vented at the base to allow drainage? | <input checked="" type="radio"/> Yes | <input type="radio"/> No <u>NA</u> |

Comments:

Monitoring Well Integrity Checklist

Site Name: Frontier Chemical

Well Identification: URS-14D

Personnel: Peter Bogardus/Chawn O'Dell

Date: 2/3/99

WELL SPECIFICATIONS

Protective Casings	Above Ground	Flush Mounted
Well Construction	PVC	Stainless Steel
Well Diameter	2-inch	4- inch
Depth to Ground Water	7.82	
Well Depth	41.68	

WELL INTEGRITY

- | | | |
|--|-----|-------|
| 1. Well identification clearly marked? | Yes | No |
| 2. Well covers and locks in good condition and secure? | Yes | No |
| 3. Is the well stand pipe vertically aligned and secure? | Yes | No |
| 4. Is the concrete pad and surface seal in good condition? | Yes | No |
| 5. Are soils surrounding the well pad eroded? | Yes | No |
| 6. Is the well casing in good condition? | Yes | No |
| 7. Is the measuring point on casing well marked? | Yes | No |
| 8. Is there standing water in the annular space? | Yes | No |
| 9. Is the standpipe vented at the base to allow drainage? | Yes | No NA |

Comments:

Ground water sampling logs

O'Brien & Gere Engineers, Inc.

Standard Ground Water Sampling Log

Date 02/04/99Site Name Frontier ChemicalLocation Pendleton, NYProject No 22038Personnel C. O'Dell/P. BogardusWeather OVERCAST ~ 40°FWell # 85-SREvacuation Method S. S. BAILERSampling Method S. S. BAILER

Well Information:

Depth of Well * 38.05 ft.Depth to Water * 8.06 ft.Length of Water Column 29.99 ft.Volume of Water in Well 4.89 gal.(s)3X Volume of Water in Well 14.67 gal.(s)

Water Volume /ft. for:

2" Diameter Well = 0.163 X LWC

4" Diameter Well = 0.653 X LWC

6" Diameter Well = 1.469 X LWC

Volume removed before sampling 80 gal.(s)Did well go dry? yes

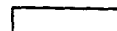
* Measurements taken from



Well Casing



Protective Casing



(Other, Specify)

Instrument Calibration:

pH Buffer Readings

4.0 Standard _____

7.0 Standard _____

10.0 Standard _____

Conductivity Standard Readings

84 S Standard _____

1413 S Standard _____

Water parameters:

Gallons
Removed

initial

0.35.015.015.0Temperature
Readings

initial

9.79.69.6pH
Readings

initial

8.438.067.97Conductivity
Readings uS/cm

initial

660958970

TURBIDITY (ntu)

9.6 ntu102 ntu375

Water Sample:

Time Collected 1615

Physical Appearance at Start

Color

colorless

Odor

none

Turbidity (> 100 NTU)

9.6 ntu

Sheen/Free Product

No

Physical Appearance at Sampling

Color

Brown

Odor

No

Turbidity (> 100 NTU)

375 ntu

Sheen/Free Product

No

Samples collected:

Container Size	Container Type	# Collected	Field Filtered	Preservative	Container pH
40 ml	vial	2	no	Hcl	<2
1 liter	plastic	1	yes	HNO3	<2
1 liter	plastic	1	no	Na2SO4	>10

Notes:

O'Brien & Gere Engineers, Inc.

Standard Ground Water Sampling Log

Date 02/04/99
 Site Name Frontier Chemical
 Location Pendleton, NY
 Project No 22038
 Personnel C. O'Dell/P. Bogardus

Weather OVERCAST ~ 40°F
 Well # 1125-5D
 Evacuation Method S.S. Barker
 Sampling Method S.S. Barker

Well Information:

Depth of Well * 49.93 ft.
 Depth to Water * 8.48 ft.
 Length of Water Column 41.45 ft.
 Volume of Water in Well 6.76 gal.(s)
 3X Volume of Water in Well 20.28 gal.(s)

Water Volume /ft. for:
 2" Diameter Well = 0.163 X LWC
 4" Diameter Well = 0.653 X LWC
 6" Diameter Well = 1.469 X LWC

Volume removed before sampling 12.0 gal.(s)
 Did well go dry? yes

* Measurements taken from ☒ Well Casing ☐ Protective Casing ☐ (Other, Specify)

Instrument Calibration:

pH Buffer Readings

4.0 Standard _____
 7.0 Standard _____
 10.0 Standard _____

Conductivity Standard Readings

84 S Standard _____
 1413 S Standard _____

Water parameters:

Gallons Removed

initial 0.3
7.0
14.2 12.0
21.0 DRY

Temperature Readings

initial 9.9
9.3
8.9
8

pH Readings

initial 8.48
7.98
7.31

Conductivity Readings uS/cm

initial 2740
2860
2910

Turbidity (ntu)
15.1 ntu
47.2
65.4

Water Sample:

Time Collected 1635

Physical Appearance at Start

Color Colorless
 Odor Sulfur
 Turbidity (> 100 NTU) 15.1 ntu
 Sheen/Free Product No

Physical Appearance at Sampling

Color Gray
 Odor Sulfur
 Turbidity (> 100 NTU) 65.4
 Sheen/Free Product No

Samples collected:

Container Size	Container Type	# Collected	Field Filtered	Preservative	Container pH
40 ml	vial	2	no	Hcl	<2
1 liter	plastic	1	yes	HNO3	<2
1 liter	plastic	1	no	Na2SO4	>10

Notes:

O'Brien & Gere Engineers, Inc.

Standard Ground Water Sampling Log

Date 02/04/99
 Site Name Frontier Chemical
 Location Pendleton, NY
 Project No 22038
 Personnel C. O'Dell/P. Bogardus

Weather OVERCAST ~ 45°F
 Well # 85-7R
 Evacuation Method S.S. bailer
 Sampling Method S.S. bailer

Well Information:

Depth of Well * 27.78 ft.
 Depth to Water * 5.60 ft.
 Length of Water Column 22.18 ft.
 Volume of Water in Well 3.62 gal.(s)
 3X Volume of Water in Well 10.86 gal.(s)

Water Volume /ft. for:

2" Diameter Well = 0.163 X LWC

4" Diameter Well = 0.653 X LWC

6" Diameter Well = 1.469 X LWC

Volume removed before sampling 11.0 gal.(s)
 Did well go dry? _____

(Other, Specify)

* Measurements taken from

☒

Well Casing

☐

Protective Casing

☐

Instrument Calibration:

pH Buffer Readings

4.0 Standard _____

7.0 Standard _____

10.0 Standard _____

Conductivity Standard Readings

84 S Standard _____

1413 S Standard _____

Water parameters:

Gallons
RemovedTemperature
ReadingspH
ReadingsConductivity
Readings uS/cm

initial 0.3
4.0
7.5
11.0

initial 8.9
9.4
9.6
9.7

initial 8.61
7.86
7.41
7.32

initial 2410
2960
3040
3110

6.2 ntu

574 473

Water Sample:

Time Collected 1430

Physical Appearance at Start

Color Colorless
 Odor No
 Turbidity (> 100 NTU) 6.2
 Sheen/Free Product No

Physical Appearance at Sampling

Color Brown
 Odor No
 Turbidity (> 100 NTU) 473 ntu
 Sheen/Free Product No

Samples collected:

Container Size	Container Type	# Collected	Field Filtered	Preservative	Container pH
40 ml	vial	2	no	Hcl	<2
1 liter	plastic	1	yes	HNO3	<2
1 liter	plastic	1	no	Na2SO4	>10

Notes:

O'Brien & Gere Engineers, Inc.

Standard Ground Water Sampling Log

Date 02/04/99
 Site Name Frontier Chemical
 Location Pendleton, NY
 Project No 22038
 Personnel C. O'Dell/P. Bogardus

Weather OVERCAST, ~45°F
 Well # URS-7D
 Evacuation Method S.S. bailer
 Sampling Method S.S. bailer

Well Information:

Depth of Well * 39.89 ft.
 Depth to Water * 6.95 ft.
 Length of Water Column 32.94 ft.
 Volume of Water in Well 5.37 gal.(s)
 3X Volume of Water in Well 16.11 gal.(s)

Water Volume /ft. for:

2" Diameter Well = 0.163 X LWC

4" Diameter Well = 0.653 X LWC

6" Diameter Well = 1.469 X LWC

Volume removed before sampling 16.5 gal.(s)Did well go dry? Yes

* Measurements taken from

☒ Well Casing☐ Protective Casing☐ (Other, Specify)

Instrument Calibration:

pH Buffer Readings

4.0 Standard 7.0 Standard 10.0 Standard

Conductivity Standard Readings

84 S Standard 1413 S Standard

Water parameters:

Gallons
RemovedTemperature
ReadingspH
ReadingsConductivity
Readings uS/cm

initial 0.3
5.5
11.0
16.5 DR
16.5

initial 9.1
9.4
9.8
9.5
9.9

initial 7.85
7.61
7.42
7.42
7.36

initial 706 uS/cm
2560
2960
3010

10.4 ntr
36.7
41.2
57.1

Water Sample:

Time Collected 1445

Physical Appearance at Start

Color ColorlessOdor No - SulfurTurbidity (> 100 NTU) 10.4 ntrSheen/Free Product No

Physical Appearance at Sampling

Color cloudyOdor SulfurTurbidity (> 100 NTU) 57.1Sheen/Free Product No

Samples collected:

Container Size	Container Type	# Collected	Field Filtered	Preservative	Container pH
40 ml	vial	2	no	Hcl	<2
1 liter	plastic	1	yes	HNO3	<2
1 liter	plastic	1	no	Na2SO4	>10

Notes:

O'Brien & Gere Engineers, Inc.

Standard Ground Water Sampling Log

Date 02/03/99
 Site Name Frontier Chemical
 Location Pendleton, NY
 Project No 22038
 Personnel C. O'Dell/P. Bogardus

Weather Partly Sunny, ~45°F
 Well # URS-9I
 Evacuation Method Grundfos Pump
 Sampling Method Grundfos Pump

Well Information:

Depth of Well * 46.40 ft.
 Depth to Water * 9.01 ft.
 Length of Water Column 37.39 ft.
 Volume of Water in Well 6.09 gal.(s)
 3X Volume of Water in Well 18.27 gal.(s)

Water Volume /ft. for:

2" Diameter Well = 0.163 X LWC

4" Diameter Well = 0.653 X LWC

6" Diameter Well = 1.469 X LWC

Volume removed before sampling 18.5 gal.(s)
 Did well go dry? N/O

* Measurements taken from ☒ Well Casing ☐ Protective Casing ☐ (Other, Specify)

Instrument Calibration:

pH Buffer Readings

4.0 Standard

7.0 Standard

10.0 Standard

4.047.0010.00

Conductivity Standard Readings

84 S Standard

1413 S Standard

Water parameters:

Gallons
RemovedTemperature
ReadingspH
ReadingsConductivity
Readings uS/cm

TURBIDITY

initial 6.5
13.0
18.5

initial 10.0°C
9.9
9.9
9.9

initial 7.58
7.22
7.24
7.25

initial 1352 uS/cm
1291
1262
1253

>1000 ntu
79.8
31.4
16.1

Water Sample:

Time Collected 1705

Physical Appearance at Start

Color Gray-brown
 Odor Sulfur
 Turbidity (> 100 NTU) >1,000 ntu
 Sheen/Free Product N/O

Physical Appearance at Sampling

Color Colorless
 Odor Sulfur
 Turbidity (> 100 NTU) 16 ntu
 Sheen/Free Product N/O

Samples collected:

Container Size	Container Type	# Collected	Field Filtered	Preservative	Container pH
40 ml	vial	2	no	HCl	<2
1 liter	plastic	1	yes	HNO3	<2
1 liter	plastic	1	no	Na2SO4	>10

Notes:

O'Brien & Gere Engineers, Inc.

Standard Ground Water Sampling Log

Date 02/03/99
 Site Name Frontier Chemical
 Location Pendleton, NY
 Project No 22038
 Personnel C. O'Dell/P. Bogardus

Weather Partly Sunny ~45°F
 Well # URS-9D
 Evacuation Method Grundfos Pump
 Sampling Method Grundfos Pump

Well Information:

Depth of Well * 50.99 ft.
 Depth to Water * 8.14 ft.
 Length of Water Column 42.85 ft.
 Volume of Water in Well 6.98 gal.(s)
 3X Volume of Water in Well 20.94 gal.(s)

Water Volume /ft. for:

2" Diameter Well = 0.163 X LWC

4" Diameter Well = 0.653 X LWC

6" Diameter Well = 1.469 X LWC

Volume removed before sampling 21 gal.(s)
 Did well go dry? NO

* Measurements taken from ☒ Well Casing ☐ Protective Casing ☐ (Other, Specify)

Instrument Calibration:

pH Buffer Readings
 4.0 Standard 4.04
 7.0 Standard 7.00
 10.0 Standard 10.00

Conductivity Standard Readings
 84 S Standard _____
 1413 S Standard _____

Water parameters:

Gallons Removed	Temperature Readings	pH Readings	Conductivity Readings uS/cm	Turbidity
initial _____	initial <u>10.5 °C</u>	initial <u>7.29</u>	initial <u>1890 uS/cm</u>	<u>4.24 ntu</u>
<u>7.0</u>	<u>10.1</u>	<u>7.21</u>	<u>1860</u>	<u>0.73</u>
<u>14.0</u>	<u>10.1</u>	<u>7.19</u>	<u>1452</u>	<u>0.56</u>
<u>21.0</u>	<u>10.0</u>	<u>7.18</u>	<u>1446</u>	<u>0.51</u>
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

Water Sample:

Time Collected 1610

Physical Appearance at Start

Color Colorless
 Odor NO
 Turbidity (> 100 NTU) 4.24 ntu
 Sheen/Free Product NO

Physical Appearance at Sampling

Color Colorless
 Odor NO
 Turbidity (> 100 NTU) 0.51 ntu
 Sheen/Free Product NO

Samples collected:

Container Size	Container Type	# Collected	Field Filtered	Preservative	Container pH
40 ml	vial	2	no	Hcl	<2
1 liter	plastic	1	yes	HNO3	<2
1 liter	plastic	1	no	Na2SO4	>10

Notes:

Collect blind duplicate sample

O'Brien & Gere Engineers, Inc.

Standard Ground Water Sampling Log

Date 02/04/99
 Site Name Frontier Chemical
 Location Pendleton, NY
 Project No 22038
 Personnel C. O'Dell/P. Bogardus

Weather 4. rain ~ 40°F
 Well # 88-12C
 Evacuation Method Grandfos pump
 Sampling Method Grandfos pump

Well Information:

Depth of Well * 31.37 ft.
 Depth to Water * 11.40 ft.
 Length of Water Column 19.97 ft.
 Volume of Water in Well 3.26 gal.(s)
 3X Volume of Water in Well 9.78 gal.(s)

Water Volume /ft. for:

2" Diameter Well = 0.163 X LWC

4" Diameter Well = 0.653 X LWC

6" Diameter Well = 1.469 X LWC

Volume removed before sampling

10.5 gal.(s)

Did well go dry?

no

* Measurements taken from ☒ Well Casing ☐ Protective Casing ☐ (Other, Specify)

Instrument Calibration:

pH Buffer Readings

4.0 Standard

7.0 Standard

10.0 Standard

Conductivity Standard Readings

84 S Standard

1413 S Standard

Water parameters:

Gallons
RemovedTemperature
ReadingspH
ReadingsConductivity
Readings uS/cm

initial 0.5
3.5
7.0
10.5

initial 9.6 °C
10.5
10.7
10.6

initial 7.45
7.43
7.42
7.43

initial 1110 uS/cm
1070
1030
1020

462 ntn
27.3
19.6
3.84

Water Sample:

Time Collected

1145

Physical Appearance at Start

Physical Appearance at Sampling

Color Colorless
 Odor NO
 Turbidity (> 100 NTU) 462 ntn
 Sheen/Free Product NO

Color Colorless
 Odor NO
 Turbidity (> 100 NTU) 3.84
 Sheen/Free Product NO

Samples collected:

Container Size	Container Type	# Collected	Field Filtered	Preservative	Container pH
40 ml	vial	2	no	HCl	<2
1 liter	plastic	1	yes	HNO3	<2
1 liter	plastic	1	no	Na2SO4	>10

Notes:

O'Brien & Gere Engineers, Inc.

Standard Ground Water Sampling Log

Date 0204/99
 Site Name Frontier Chemical
 Location Pendleton, NY
 Project No 22038
 Personnel C. O'Dell/P. Bogardus

Weather OVERCAST; ~40°F
 Well # 98 WRS -12D
 Evacuation Method Grundfos Pump
 Sampling Method Grundfos Pump

Well Information:

Depth of Well * 53.36 ft.
 Depth to Water * 9.90 ft.
 Length of Water Column 42.46 ft.
 Volume of Water in Well 6.82 gal.(s)
 3X Volume of Water in Well 20.46 gal.(s)

Water Volume /ft. for:

2" Diameter Well = 0.163 X LWC

4" Diameter Well = 0.653 X LWC

6" Diameter Well = 1.469 X LWC

Volume removed before sampling 12.0 gal.(s)
 Did well go dry? yes

(Other, Specify)

* Measurements taken from

☒ Well Casing☐ Protective Casing

Instrument Calibration:

pH Buffer Readings

4.0 Standard

7.0 Standard

10.0 Standard

Conductivity Standard Readings

84 S Standard

1413 S Standard

Water parameters:

Gallons
RemovedTemperature
ReadingspH
ReadingsConductivity
Readings uS/cm

TURBIDITY (ntu)

initial 8.32.0
7.0
14.0 12.0
21.0 DRY

initial 10.5
10.6
10.7

initial 7.06
6.94
6.75

initial 7,010
65,630
5220

18.4 ntu
13.6
12.1

Water Sample:

Time Collected

1045

Physical Appearance at Start

Color

Odor

Turbidity (> 100 NTU)

Sheen/Free Product

ColorlessSulfur18.4 ntuNO

Physical Appearance at Sampling

Color

Odor

Turbidity (> 100 NTU)

Sheen/Free Product

ColorlessSulfur12.1 ntuNO

Samples collected:

Container Size	Container Type	# Collected	Field Filtered	Preservative	Container pH
40 ml	vial	2	no	Hcl	<2
1 liter	plastic	1	yes	HNO3	<2
1 liter	plastic	1	no	Na2SO4	>10

Notes:

O'Brien & Gere Engineers, Inc.

Standard Ground Water Sampling Log

Date 02/03/99 -- 02/04/99Site Name Frontier ChemicalLocation Pendleton, NYProject No 22038Personnel C. O'Dell/P. Bogardus

Weather

Partly Clear - 40°F

Well #

ND5-14Z

Evacuation Method

stainless steel bailer

Sampling Method

stainless steel bailer

Well Information:

Depth of Well * 31.18 ft.
 Depth to Water * 3.79 ft.
 Length of Water Column 27.39 ft.
 Volume of Water in Well 4.46 gal.(s)
 3X Volume of Water in Well 13.38 gal.(s)

Water Volume /ft. for:

2" Diameter Well = 0.163 X LWC

4" Diameter Well = 0.653 X LWC

6" Diameter Well = 1.469 X LWC

Volume removed before sampling
 Did well go dry?

9.5 gal.(s)

* Measurements taken from

☒

Well Casing

☐

Protective Casing

☐

(Other, Specify)

Instrument Calibration:

pH Buffer Readings

4.0 Standard

7.0 Standard

10.0 Standard

4.047.0010.00

Conductivity Standard Readings

84 S Standard

1413 S Standard

Water parameters:

Evacuated 2/3/99.Gallons
RemovedTemperature
ReadingspH
ReadingsConductivity
Readings uS/cm

TURBIDITY

initial

0.3

initial

8.6

initial

8.37

initial

461 uS/cm13.2 ntu4.59.18.284369.09.28.19422

Water Sample:

Time Collected

9:15 2/5/99.

Physical Appearance at Start

Physical Appearance at Sampling

Color

Colorless

Odor

N/O

Turbidity (> 100 NTU)

13.2 ntu

Sheen/Free Product

N/O

Color

Clear

Odor

None

Turbidity (> 100 NTU)

12

Sheen/Free Product

No

Samples collected:

Container Size	Container Type	# Collected	Field Filtered	Preservative	Container pH
40 ml	vial	2	no	HCl	<2
1 liter	plastic	1	yes	HNO3	<2
1 liter	plastic	1	no	Na2SO4	>10

Notes:

O'Brien & Gere Engineers, Inc.

Standard Ground Water Sampling Log

Date 02/25/99
 Site Name Frontier Chemical
 Location Pendleton, NY
 Project No 22038
 Personnel C. O'Dell/P. Bogardus

Weather Partly Clear ~ 20°F
 Well # URS-14D
 Evacuation Method Ground for Pump
 Sampling Method Ground for Pump

Well Information:

Depth of Well * 41.68 ft.
 Depth to Water * 7.82 ft.
 Length of Water Column 33.86 ft.
 Volume of Water in Well 5.52 gal.(s)
 3X Volume of Water in Well 16.56 gal.(s)

Water Volume /ft. for:

2" Diameter Well = 0.163 X LWC

4" Diameter Well = 0.653 X LWC

6" Diameter Well = 1.469 X LWC

Volume removed before sampling 18.0 gal.(s)
 Did well go dry? No

* Measurements taken from

☒

Well Casing

☐

Protective Casing

☐

(Other, Specify)

Instrument Calibration:

pH Buffer Readings

4.0 Standard

7.0 Standard

10.0 Standard

Conductivity Standard Readings

84 S Standard

1413 S Standard

Water parameters:

Gallons
RemovedTemperature
ReadingspH
ReadingsConductivity
Readings uS/cm

initial 0.5
6.0
12.0
18.0

initial 10.5
10.3
10.1
10.1

initial 7.65
6.94
6.71
6.75

initial 315 uS/cm
1790
1910
1930

132 ntu
3.85
1.77
1.70

Water Sample:

Time Collected 0900

Physical Appearance at Start

Color cloudy
 Odor Sulfur
 Turbidity (> 100 NTU) 132 ntu
 Sheen/Free Product No

Physical Appearance at Sampling

Color colorless
 Odor Sulfur
 Turbidity (> 100 NTU) 1.70
 Sheen/Free Product No

Samples collected:

Container Size	Container Type	# Collected	Field Filtered	Preservative	Container pH
40 ml	vial	2	no	Hcl	<2
1 liter	plastic	1	yes	HNO3	<2
1 liter	plastic	1	no	Na2SO4	>10

Notes:

Client: <u>OBrien & Gere Laboratories, Inc.</u>		Analysis/Method				
Project: <u>FRONTIER CHEMICAL - HAZARDOUS SITE</u>						
Sampled by: <u>CHUCK ODELL</u>						
Client Contact: <u>Jean Lee Smith</u>		Phone # <u>(315) 437-6100</u>				
Sample Description						
Sample Location	Date Collected	Time Collected	Sample Matrix	Comp. or Grab	No. of Containers	Comments
URS-9D	02/03/99	1610	WATER	GRAB	5	
URS-9E	02/03/99	1705	WATER	GRAB	5	
BLIND DUPLICATE	02/03/99	---	WATER	GRAB	5	
88-12D	02/04/99	1045	WATER	GRAB	5	
88-12C	02/04/99	1145	WATER	GRAB	5	
85-7R	02/04/99	1430	WATER	GRAB	5	
URS-7D	02/04/99	1445	WATER	GRAB	5	
85-5R	02/04/99	1615	WATER	GRAB	5	
URS-5D	02/04/99	1635	WATER	GRAB	5	
Equipment blank	02/04/99	0830	WATER	GRAB	5	
URS-14D	02/05/99	0900	WATER	GRAB	5	
URS-14D matrix spike	02/05/99	0900	WATER	GRAB	5	
Relinquished by: <u>Charles Odell</u>		Date: <u>02/05/99</u> Time: <u>1350</u>				
Relinquished by:		Date: Time:				
Relinquished by:		Date: Time:				
Shipment Method:		Received by Lab: <u>Michael Spillman</u> Date: <u>2/5/99</u> Time: <u>13:50</u>				
Turnaround Time Required:		Airbill Number:				
Routine						
Rush (Specify)						
Cooler Temperature: <u>5°C</u>						

Comments:

Sample Description

Relinquished by: <i>John J. J.</i>	Date: <i>02/05/99</i>	Time: <i>1:50</i>	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received by Lab: <i>Wade J. J.</i>	Date: <i>2/5/99</i>	Time: <i>1:50</i>
Shipment Method:			Airbill Number:		

Original-Laboratory	Copy-Client
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95	95
96	96
97	97
98	98
99	99
100	100

Data validation report

Data Validation Services

120 Cobble Creek Road P. O. Box 208

North Creek, N. Y. 12853

Phone 518-251-4429

March 10, 1999

Jennifer Smith
O'Brien & Gere Engineers
5000 Brittonfield Parkway
P. O. Box 4873
Syracuse, NY 13221

RE: Validation of Frontier Chemical Site Data Packages
OBG Labs Report of 2/17/99

Dear Ms. Smith:

Review has been completed for the data package generated by OBG Laboratories, pertaining to samples collected at the Frontier Chemical Site. Eleven aqueous samples were analysed for TCL volatiles and TAL metals/cyanide parameters. Matrix spikes/duplicates, and field and trip blanks were also processed. Methodologies utilized are those of the USEPA SW846.

Data validation was performed with guidance from the most current editions of the USEPA CLP National Functional Guidelines for Organic and Inorganic Data Review and the USEPA SOPs HW-2 and HW-6. The following items were reviewed:

- * Data Completeness
- * Custody Documentation
- * Holding Times
- * Surrogate and Internal Standard Recoveries
- * Matrix Spike Recoveries/Duplicate Correlations
- * Preparation/Calibration Blanks
- * Control Spike/Laboratory Control Samples
- * Instrumental Tunes
- * Calibration Standards
- * Instrument IDLs
- * Method Compliance
- * Sample Result Verification

Those items showing deficiencies are discussed in the following sections of this report. All others were found to be acceptable as outlined in the above-mentioned validation procedures, and as applicable for the methodology. Unless noted specifically in the following text, reported results are substantiated by the raw data, and generated in compliance with protocol requirements.

In summary, sample processing was primarily conducted with compliance to protocol requirements and with adherence to quality criteria, and most reported results are usable with minor qualification. Certain edits to, and qualification of, reported results are indicated. These issues are discussed in the following analytical sections.

The laboratory summary data package, with recommended qualifiers applied in red ink to the sample result forms is attached to this narrative, and should be reviewed in conjunction with this text.

Data Completeness

The laboratory data packages were not directly in compliance with the required NYSDEC ASP Category B deliverables, but the information needed for validation of the data was present. The laboratory NYSDEC Sample Preparation and Analysis Summary Forms were not provided, and no verbatim certification statement was made in the case narrative.

Volatile Analyses

Carbon disulfide was detected in the field blank at a level of 0.10 ug/L. Due to possible contamination contribution, the reported results for that analyte in the project samples which reported detection below 0.50 ug/L should be edited to reflect nondetection at the CRDL (i.e. "<0.50 ").

Sample URS-14D produced a slightly low recovery for surrogate standard d8-toluene (76%, below required limit of 84%). Sample results (which were nondetection) are therefore considered estimated ("J").

Matrix spikes of URS-14D involved evaluation of recoveries of all target analytes. Carbon disulfide produced elevated recoveries of (231% and 211%), which indicates that the detected result for that analyte in the sample should be considered estimated ("J" qualifier). In consideration of the presence of this analyte in the field blank, detected results for this analyte in samples which were not edited to nondetection (see above) should also be considered estimated ("J"). Other spiked compounds also produced elevated recoveries, but the samples do not contain these components, and results are therefore not affected. Three compounds produced low recoveries (34% to 59%) which indicate that those analyte results should be considered estimated ("J"), possibly biased low in the sample. They are cis-1,3-dichloropropene, trans-1,3-dichloropropene, and styrene. The laboratory case narrative discussion cites that the presence of sulfur in the sample may be responsible for the depressed recoveries. This sample also exhibited low recovery for surrogate standard d8-toluene, and all reported results for this sample are qualified as estimated ("J"). Other of the project samples also showed sulfur compounds present (reported as Tentatively Identified Compounds (TICs), but surrogates showed acceptable recoveries, and those results are not recommended for qualification. Duplicate correlation, and spiked blank recoveries were acceptable.

Due to poor spectral quality, the identification of 1,1-dichloroethane in URS-9D should be considered tentative ("N" qualifier). It is noted that this analyte spectrum in the blind duplicate of that sample was acceptable for identification.

Field duplicate correlation between Blind Duplicate and URS-9D was acceptable.

Metals/CN Analyses

Four of the samples were filtered prior to the metals/cyanide analyses.

The filtered sample results for antimony, which were all nondetection, were reported to an incorrect detection limit of 0.06 mg/L. Raw data supports editing the detection limits to be those of the other samples (and the QAPP reporting level), 0.005 mg/L.

Accuracy and precision evaluations for URS-14D were acceptable, with the exception of the recoveries of selenium, which were 32% and 37%. Therefore the sample selenium results should be considered estimated ("J").

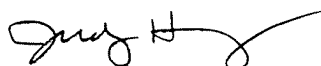
The serial dilution determinations for URS-14D produced acceptable correlations.

The IDLs for thallium are outdated (11/97) and should be regenerated.

Field duplicate correlation between URS-9D and Blind Duplicate was acceptable.

Please do not hesitate to contact me if questions or comments arise during your review of this report.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Judy H', with a stylized flourish extending from the end.

Judy Harry

NARRATIVE

INTRODUCTION/ANALYTICAL RESULTS

This report summarizes the laboratory results for samples from Frontier Chemical - Pendleton Site, Town of Pendleton, Niagara County, NY. Immediately following the narrative is the Cross Reference Table that lists the site descriptions, sample numbers, dates collected, dates received and package numbers.

CONDITION UPON RECEIPT/CHAIN OF CUSTODY

The coolers were received intact. When the coolers were received by the laboratory, the sample custodian(s) opened and inspected the shipments for damage, custody inconsistencies and proper preservation. The chain of custody forms documenting receipt are presented in the chain of custody section. Each sample was assigned a unique laboratory number and a custody file created. The samples were placed in a secured walk-in cooler and signed in and out by the chemists performing the tests. The sign out record, or lab chronicle, is presented in the chain of custody section.

No discrepancies were noted upon receipt. The cooler temperature upon receipt was 5°C.

METHODOLOGY

The following methods were used to perform the analyses:

PARAMETER	METHOD	REFERENCE
Volatile Organics	8260B	1
ICP Metals	6010B	1
Mercury	7470A	1
Thallium	7841	1
Cyanide	9010B/9014	1

- 1) Test Methods for Evaluating Solid Wastes, SW-846 Third Edition, Final Update III, December 1996.

QUALITY CONTROL

The quality control for this program includes internal standards, surrogates, matrix spike (MS), matrix spike duplicate (MSD), laboratory duplicate (D), equipment blank, blind duplicate, laboratory control sample (LCS), prep blank and QC trip blank samples. QA/QC results are summarized in the Sample Data Summary Package and are also included in the raw data.

Volatile Organics

The GC/MS Volatile instruments used a J&W DB-VRX, 60 m x 0.25 mm ID capillary column and a Vocarb 3000 trap.

Holding Times and Sample Preservation

All samples were prepared and analyzed within the method and/or QAPP specified holding time requirements. Samples had a pH of less than 2.

Laboratory Control Sample

All spike recoveries met method and/or project specific QC criteria.

MS/MSD

The following compound(s) did not meet matrix spike/matrix spike duplicate percent recovery criteria:

Sample Description	Sample #	Compound	Corrective Action
URS-14D	K5554	1,1-Dichloroethene	1
		Carbon disulfide	1
		trans-1,2-Dichloroethene	1
		1,1,1-Trichloroethane	1
		Carbon tetrachloride	1
		Bromodichloromethane	1
		cis-1,3-Dichloropropene	1
		trans-1,3-Dichloropropene	1
		Dibromochloromethane	1
		Bromoform	1
		Styrene	1

1. Sulfur was detected in the sample. The failed recovery is attributed to sulfur interference. The MS/MSD met RPD criteria. LCS criteria was met for this compound. No corrective action was taken.

Surrogate

The following sample(s) did not meet surrogate recovery criteria:

Sample Description	Sample #	Surrogate	Corrective Action
URS-14I	K5555	Toluene-d8	1

1. Sulfur was detected in the sample. The failed recovery may be attributed to sulfur interference. The sample was not reanalyzed due to holding time constraints. There were no compounds detected above the PQL. No corrective action was taken.

Internal Standards

All internal standard areas met method and/or project specific QC criteria.

Calibrations

All calibrations and calibration verifications met method and/or project specific QC criteria.

For calibration check standard compounds that had a linear regression performed, a % drift was calculated between the true value of the calibration check standard and the calculated value. For compounds using an average response factor, the % difference between the average response factor and the daily response factor was calculated. Summary sheets for both calculations are included in the raw data section.

Preparation Blanks

All preparation blanks met method and/or project specific QC criteria.

Trace Metals

Holding Times

All samples were prepared and analyzed within the method and/or QAPP specified holding time requirements.

Laboratory Control Sample

All spike recoveries met method and/or project specific QC criteria.

D/MS/MSD

The following analyte(s) did not meet matrix spike/matrix spike duplicate percent recovery and/or duplicate RPD criteria:

Sample Description	Sample #	Analyte	% REC	RPD	Corrective Action
URN-14D	K5554	Calcium	X		1
		Selenium	X		2
		Iron		X	3

1. The concentration of the analyte in the sample was much greater than the concentration of the spike added. A post-digestion spike was performed. No further corrective action was taken.
2. The failing matrix spike is likely due to matrix interference. A post-digestion spike was performed. No further corrective action was taken.
3. The sample result is <5x the PQL and the difference between sample/duplicate is less than the PQL. No further corrective action was taken.

ICP Serial Dilution

All percent differences met method and/or project specific QC criteria.

Graphite Furnace Analysis

The following analytes did not meet furnace analytical spike percent recovery criteria:

Sample Description	Sample #	Analyte	Corrective Action
Laboratory Control Sample	L021899W2	Thallium	1

1. The percent recovery was over 60%. No corrective action was required.

Frontier Chemical
Pendleton Site
Town of Pendleton
Niagara County, NY
Water Samples
Page 4

Calibrations

All calibrations and calibration verifications met method and/or project specific QC criteria.

Preparation Blanks

All preparation blanks met method and/or project specific QC criteria.

Wet Chemistry

There were no excursions to note. All QC results were within established control limits.

RAW DATA

The raw data is organized in a format similar to the US EPA Contract Laboratory Program order of data requirements.

CROSS REFERENCE TABLE

Site	Sample Number	Date Collected	Date Received	Pkg
URS-9D	K5544	02/03/99	02/05/99	704
URS-9I	K5545	02/03/99	02/05/99	704
Blind Duplicate	K5546	02/03/99	02/05/99	704
88-12D	K5547	02/04/99	02/05/99	704
88-12C	K5548	02/04/99	02/05/99	704
85-7R	K5549	02/04/99	02/05/99	704
URS-7D	K5550	02/04/99	02/05/99	704
85-5R	K5551	02/04/99	02/05/99	704
URS-5D	K5552	02/04/99	02/05/99	704
Equipment Blank	K5553	02/05/99	02/05/99	704
URS-14D	K5554	02/05/99	02/05/99	704
URS-14D	K5554MS	02/05/99	02/05/99	704
URS-14D	K5554MSD	02/05/99	02/05/99	704
URS-14D	K5554D	02/05/99	02/05/99	704
URS-14I	K5555	02/05/99	02/05/99	704
QC Trip Blank	K5556	02/03/99	02/05/99	704
85-7R (Field Filtered)	K5557	02/04/99	02/05/99	704
URS-7D (Field Filtered)	K5558	02/04/99	02/05/99	704
85-5R (Field Filtered)	K5559	02/04/99	02/05/99	704
URS-5D (Field Filtered)	K5560	02/04/99	02/05/99	704

Volume 1 of 3 of the validated analytical data is separately bound.

Frontier Chemical Pendleton Site Town of Pendleton Niagara County, NY Water Samples

February 3, 4, and 5, 1999



ANALYTICAL PACKAGE

for

**Frontier Chemical
Pendleton Site
Town of Pendleton
Niagara County, NY**

Samples collected: February 3, 4, and 5, 1999

Volume 1 of 3

Prepared for:

O'Brien & Gere Engineers, Inc.
5000 Brittonfield Parkway
P.O. Box 4873
Syracuse, NY 13221

Prepared by:

O'Brien & Gere Laboratories, Inc.
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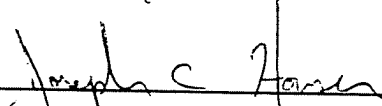
Authorized



Date

2/25/99

Reviewed



Date

2/26/99

TABLE OF CONTENTS

Volume 1 of 3 **Page No.**

SAMPLE DATA SUMMARY PACKAGE

Narrative	1 - 4
Cross Reference Table	5
Analytical Results	6 - 60
Quality Control Results	61 - 85
Chain of Custody	
External Chain of Custody	86 - 88
Internal Chain of Custody	89 - 90

Volume 2 of 3

SAMPLE DATA PACKAGE

Narrative	91 - 94
Cross Reference Table	95
Section 1 GC/MS Volatile Organics Data	96 - 334

Volume 3 of 3

Section 2 Trace Metals Data	335 - 645
Section 3 Wet Chemistry Data (Total Cyanide)	655 - 658

Sample Data Summary Package

NARRATIVE

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		Carbon tetrachloride	1
		Bromodichloromethane	1
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		trans-1,3-Dichloropropene	1
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Frontier Chemical
Pendleton Site
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Niagara County, NY
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Page 4

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88-12C	K5548	02/04/99	02/05/99	704
85-7R	K5549	02/04/99	02/05/99	704
URS-7D	K5550	02/04/99	02/05/99	704
85-5R	K5551	02/04/99	02/05/99	704
URS-5D	K5552	02/04/99	02/05/99	704
Equipment Blank	K5553	02/05/99	02/05/99	704
URS-14D	K5554	02/05/99	02/05/99	704
URS-14D	K5554MS	02/05/99	02/05/99	704
URS-14D	K5554MSD	02/05/99	02/05/99	704
URS-14D	K5554D	02/05/99	02/05/99	704
URS-14I	K5555	02/05/99	02/05/99	704
QC Trip Blank	K5556	02/03/99	02/05/99	704
85-7R (Field Filtered)	K5557	02/04/99	02/05/99	704
URS-7D (Field Filtered)	K5558	02/04/99	02/05/99	704
85-5R (Field Filtered)	K5559	02/04/99	02/05/99	704
URS-5D (Field Filtered)	K5560	02/04/99	02/05/99	704

Analytical Results

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY


Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5544
Samp. Description: URS-9D
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/03/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Chloromethane	<1.0		1	02/12/99	
Vinyl chloride	<1.0		1	02/12/99	
Bromomethane	<1.0		1	02/12/99	
Chloroethane	<1.0		1	02/12/99	
Acetone	<10.		1	02/12/99	
1,1-Dichloroethene	<.50		1	02/12/99	
Methylene chloride	<.50		1	02/12/99	
Carbon disulfide	<0.150 J .10		1	02/12/99	
trans-1,2-Dichloroethene	<.50		1	02/12/99	
1,1-Dichloroethane	J .16 N		1	02/12/99	
2-Butanone	<10.		1	02/12/99	
cis-1,2-Dichloroethene	J .35		1	02/12/99	
Chloroform	<.50		1	02/12/99	
1,2-Dichloroethane	<.50		1	02/12/99	
1,1,1-Trichloroethane	<.50		1	02/12/99	
Carbon tetrachloride	<.50		1	02/12/99	
Benzene	<.50		1	02/12/99	
1,2-Dichloropropane	<.50		1	02/12/99	
Trichloroethene	J .21		1	02/12/99	
Bromodichloromethane	<.50		1	02/12/99	
cis-1,3-Dichloropropene	<.50		1	02/12/99	
4-Methyl-2-pentanone	<5.0		1	02/12/99	
trans-1,3-Dichloropropene	<.50		1	02/12/99	
1,1,2-Trichloroethane	<.50		1	02/12/99	
Toluene	<.50		1	02/12/99	
Dibromochloromethane	<.50		1	02/12/99	
2-Hexanone	<5.0		1	02/12/99	
Tetrachloroethene	<.50		1	02/12/99	
Chlorobenzene	<.50		1	02/12/99	

- Outside control limits J-Estimated value

Edits
3-10-99
Authorized: 
Date: February 17, 1999 Thomas Alexander

**O'Brien & Gere
Laboratories, Inc.**

**Analytical Results
Method: 8260**

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155


Sample: K5544
Samp. Description: URS-9D
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/03/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Ethylbenzene	<.50		1	02/12/99	
Bromoform	<.50		1	02/12/99	
Xylene (total)	<.50		1	02/12/99	
Styrene	<.50		1	02/12/99	
1,1,2,2-Tetrachloroethane	<.50		1	02/12/99	
1,2-Dichloroethane-d4 (surrogate)	90.%	80-135	1	02/12/99	
Dibromofluoromethane (surrogate)	95.%	61-136	1	02/12/99	
Toluene-d8 (surrogate)	95.%	84-114	1	02/12/99	
Bromofluorobenzene (surrogate)	90.%	77-117	1	02/12/99	

Notes:

Outside control limits J-Estimated value

Authorized: 
Date: February 17, 1999 Thomas Alexander

Tentatively Identified Compound (LSC) summary

Operator ID: SG Date Acquired: 12 Feb 1999 15:18

Data File: C:\HPCHEM\1\DATA\J3673.D

Sample Name: K5544

Misc: URS-9D

Method: C:\HPCHEM\1\METHODS\J212TCLW.M (RTE Integrator)

Sample Title: VOC's w/J & W DB-VRX: 0.25 mm x 60 m

Library Searched: C:\DATABASE\NBS75K.L

TIC Top Hit name	RT	EstConc	Units	Area	IntStd	ISRT	ISArea	ISConc
Carbonyl sulfide ✓	5.91	1.6	ug/L	270536	ISTD01	14.97	1673850	10.0

J3673.D J212TCLW.M Tue Feb 16 08:21:06 1999

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155


Sample: K5545
Samp. Description: URS-9I
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/03/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog Limits Dilution	Analyzed Notes
Chloromethane	<1.0	1	02/12/99
Vinyl chloride	<1.0	1	02/12/99
Bromomethane	<1.0	1	02/12/99
Chloroethane	<1.0	1	02/12/99
Acetone	<10.	1	02/12/99
1,1-Dichloroethene	<.50	1	02/12/99
Methylene chloride	<.50	1	02/12/99
Carbon disulfide	<.50 J-.15	1	02/12/99
trans-1,2-Dichloroethene	<.50	1	02/12/99
1,1-Dichloroethane	<.50	1	02/12/99
2-Butanone	<10.	1	02/12/99
cis-1,2-Dichloroethene	<.50	1	02/12/99
Chloroform	<.50	1	02/12/99
1,2-Dichloroethane	<.50	1	02/12/99
1,1,1-Trichloroethane	<.50	1	02/12/99
Carbon tetrachloride	<.50	1	02/12/99
Benzene	<.50	1	02/12/99
1,2-Dichloropropane	<.50	1	02/12/99
Trichloroethene	<.50	1	02/12/99
Bromodichloromethane	<.50	1	02/12/99
cis-1,3-Dichloropropene	<.50	1	02/12/99
4-Methyl-2-pentanone	<5.0	1	02/12/99
trans-1,3-Dichloropropene	<.50	1	02/12/99
1,1,2-Trichloroethane	<.50	1	02/12/99
Toluene	<.50	1	02/12/99
Dibromochloromethane	<.50	1	02/12/99
2-Hexanone	<5.0	1	02/12/99
Tetrachloroethene	<.50	1	02/12/99
Chlorobenzene	<.50	1	02/12/99

Edits 3-10-99

- Outside control limits J-Estimated value

Authorized: 
Date: February 17, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155


Sample: K5545
Samp. Description: URS-9I
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/03/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Ethylbenzene	<.50		1	02/12/99	
Bromoform	<.50		1	02/12/99	
Xylene (total)	<.50		1	02/12/99	
Styrene	<.50		1	02/12/99	
1,1,2,2-Tetrachloroethane	<.50		1	02/12/99	
1,2-Dichloroethane-d4 (surrogate)	89.%	80-135	1	02/12/99	
Dibromofluoromethane (surrogate)	91.%	61-136	1	02/12/99	
Toluene-d8 (surrogate)	93.%	84-114	1	02/12/99	
Bromofluorobenzene (surrogate)	87.%	77-117	1	02/12/99	

Notes:

Outside control limits J-Estimated value

Authorized: 
Date: February 17, 1999 Thomas Alexander

Tentatively Identified Compound (LSC) summary

Operator ID: SG Date Acquired: 12 Feb 1999 15:56
 Data File: C:\HPCHEM\1\DATA\J3674.D
 Name: K5545
 Misc: URS-9I
 Method: C:\HPCHEM\1\METHODS\J212TCLW.M (RTE Integrator)
 Title: VOC's w/J & W DB-VRX: 0.25 mm x 60 m
 Library Searched: C:\DATABASE\NBS75K.L

TIC Top Hit name	RT	EstConc	Units	Area	IntStd	ISRT	ISArea	ISConc
Sulfur dioxide ✓	5.94	5.7	ug/L	1021560	ISTD01	14.98	1780270	10.0

J3674.D J212TCLW.M Tue Feb 16 08:21:16 1999

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

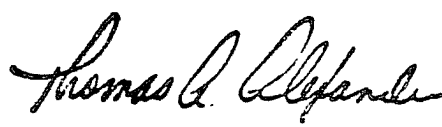
Sample: K5546
Samp. Description: Blind Duplicate
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/03/99
Received: 02/05/99
Prepared: 02/12/99

Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Chloromethane	<1.0		1	02/12/99	
Vinyl chloride	<1.0		1	02/12/99	
Bromomethane	<1.0		1	02/12/99	
Chloroethane	<1.0		1	02/12/99	
Acetone	<10.		1	02/12/99	
1,1-Dichloroethene	<.50		1	02/12/99	
Methylene chloride	<.50		1	02/12/99	
Carbon disulfide	<0.50 J .14		1	02/12/99	
trans-1,2-Dichloroethene	<.50		1	02/12/99	
1,1-Dichloroethane	J .18		1	02/12/99	
2-Butanone	<10.		1	02/12/99	
cis-1,2-Dichloroethene	J .38		1	02/12/99	
Chloroform	<.50		1	02/12/99	
1,2-Dichloroethane	<.50		1	02/12/99	
1,1,1-Trichloroethane	<.50		1	02/12/99	
Carbon tetrachloride	<.50		1	02/12/99	
Benzene	<.50		1	02/12/99	
1,2-Dichloropropane	<.50		1	02/12/99	
Trichloroethene	J .19		1	02/12/99	
Bromodichloromethane	<.50		1	02/12/99	
cis-1,3-Dichloropropene	<.50		1	02/12/99	
4-Methyl-2-pentanone	<5.0		1	02/12/99	
trans-1,3-Dichloropropene	<.50		1	02/12/99	
1,1,2-Trichloroethane	<.50		1	02/12/99	
Toluene	<.50		1	02/12/99	
Dibromochloromethane	<.50		1	02/12/99	
2-Hexanone	<5.0		1	02/12/99	
Tetrachloroethene	<.50		1	02/12/99	
Chlorobenzene	<.50		1	02/12/99	

- Outside control limits J-Estimated value

Authorized: 
Date: February 17, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155


Sample: K5546
Samp. Description: Blind Duplicate
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/03/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Ethylbenzene	<.50		1	02/12/99	
Bromoform	<.50		1	02/12/99	
Xylene (total)	<.50		1	02/12/99	
Styrene	<.50		1	02/12/99	
1,1,2,2-Tetrachloroethane	<.50		1	02/12/99	
1,2-Dichloroethane-d4 (surrogate)	92.%	80-135	1	02/12/99	
Dibromofluoromethane (surrogate)	95.%	61-136	1	02/12/99	
Toluene-d8 (surrogate)	97.%	84-114	1	02/12/99	
Bromofluorobenzene (surrogate)	90.%	77-117	1	02/12/99	

Notes:

Outside control limits J-Estimated value

Authorized: 

Date: February 17, 1999 Thomas Alexander

Tentatively Identified Compound (LSC) summary

Operator ID: SG Date Acquired: 12 Feb 1999 16:33

Data File: C:\HPCHEM\1\DATA\J3675.D

Sample Name: K5546

Misc: Blind Duplicate

Method: C:\HPCHEM\1\METHODS\J212TCLW.M (RTE Integrator)

Injection Volume: 0.25 µL

Library Searched: C:\DATABASE\NBS75K.L

TIC Top Hit name	RT	EstConc	Units	Area	IntStd	ISRT	ISArea	ISConc
Sulfur dioxide ✓	5.95	7.4	ug/L	1304300	ISTD01	14.98	1770520	10.0

J3675.D J212TCLW.M Tue Feb 16 08:21:30 1999

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5547
Samp. Description: 88-12D
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/04/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog	Dilution	Analyzed	Notes
		Limits			
Chloromethane	<1.0		1	02/12/99	
Vinyl chloride	<1.0		1	02/12/99	
Bromomethane	<1.0		1	02/12/99	
Chloroethane	<1.0		1	02/12/99	
Acetone	<10.		1	02/12/99	
1,1-Dichloroethene	<.50		1	02/12/99	
Methylene chloride	<.50		1	02/12/99	
Carbon disulfide	.70 J		1	02/12/99	
trans-1,2-Dichloroethene	<.50		1	02/12/99	
1,1-Dichloroethane	<.50		1	02/12/99	
2-Butanone	<10.		1	02/12/99	
cis-1,2-Dichloroethene	<.50		1	02/12/99	
Chloroform	<.50		1	02/12/99	
1,2-Dichloroethane	<.50		1	02/12/99	
1,1,1-Trichloroethane	<.50		1	02/12/99	
Carbon tetrachloride	<.50		1	02/12/99	
Benzene	<.50		1	02/12/99	
1,2-Dichloropropane	<.50		1	02/12/99	
Trichloroethene	<.50		1	02/12/99	
Bromodichloromethane	<.50		1	02/12/99	
cis-1,3-Dichloropropene	<.50		1	02/12/99	
4-Methyl-2-pentanone	<5.0		1	02/12/99	
trans-1,3-Dichloropropene	<.50		1	02/12/99	
1,1,2-Trichloroethane	<.50		1	02/12/99	
Toluene	<.50		1	02/12/99	
Dibromochloromethane	<.50		1	02/12/99	
2-Hexanone	<5.0		1	02/12/99	
Tetrachloroethene	<.50		1	02/12/99	
Chlorobenzene	<.50		1	02/12/99	

- Outside control limits J-Estimated value

Authorized: 

Date: February 17, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5547
Samp. Description: 88-12D
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/04/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

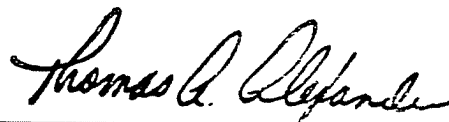
Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Ethylbenzene	<.50		1	02/12/99	
Bromoform	<.50		1	02/12/99	
Xylene (total)	<.50		1	02/12/99	
Styrene	<.50		1	02/12/99	
1,1,2,2-Tetrachloroethane	<.50		1	02/12/99	
1,2-Dichloroethane-d4 (surrogate)	93.%	80-135	1	02/12/99	
Dibromofluoromethane (surrogate)	98.%	61-136	1	02/12/99	
Toluene-d8 (surrogate)	102.%	84-114	1	02/12/99	
Bromofluorobenzene (surrogate)	96.%	77-117	1	02/12/99	

Notes:

- Outside control limits J-Estimated value

Authorized: _____

Date: February 17, 1999 Thomas Alexander



Tentatively Identified Compound (LSC) summary

Operator ID: SG Date Acquired: 12 Feb 1999 17:10
 Data File: C:\HPCHEM\1\DATA\J3676.D
 Name: K5547
 Misc: 88-12D
 Method: C:\HPCHEM\1\METHODS\J212TCLW.M (RTE Integrator)
 Title: VOC's w/J & W DB-VRX: 0.25 mm x 60 m
 Library Searched: C:\DATABASE\NBS75K.L

TIC Top Hit name	RT	EstConc	Units	Area	IntStd	ISRT	ISArea	ISConc
1 2 (2-Hydroxyethyl)	1 5.61	1.5	ug/L	263364	ISTD01	14.98	1725540	10.0
Propane ✓	2 5.84	15.8	ug/L	2726840	ISTD01	14.98	1725540	10.0
Sulfur dioxide ✓	3 5.94	18.0	ug/L	3112330	ISTD01	14.98	1725540	10.0
4 butane	4 6.47	5.0	ug/L	866621	ISTD01	14.98	1725540	10.0
Pentane ✓	5 6.96	2.8	ug/L	477550	ISTD01	14.98	1725540	10.0

J3676.D J212TCLW.M Tue Feb 16 08:21:48 1999

1 Unknown
 2 ✓
 3 ✓
 4 Unknown Hydrocarbon
 5 ✓

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5548
Samp. Description: 88-12C
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/04/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed Notes
		Limits	Dilution	
Chloromethane	<1.0		1	02/12/99
Vinyl chloride	<1.0		1	02/12/99
Bromomethane	<1.0		1	02/12/99
Chloroethane	<1.0		1	02/12/99
Acetone	<10.		1	02/12/99
1,1-Dichloroethene	<.50		1	02/12/99
Methylene chloride	<.50		1	02/12/99
Carbon disulfide	<.50		1	02/12/99
trans-1,2-Dichloroethene	<.50		1	02/12/99
1,1-Dichloroethane	<.50		1	02/12/99
2-Butanone	<10.		1	02/12/99
cis-1,2-Dichloroethene	<.50		1	02/12/99
Chloroform	<.50		1	02/12/99
1,2-Dichloroethane	<.50		1	02/12/99
1,1,1-Trichloroethane	<.50		1	02/12/99
Carbon tetrachloride	<.50		1	02/12/99
Benzene	<.50		1	02/12/99
1,2-Dichloropropane	<.50		1	02/12/99
Trichloroethene	<.50		1	02/12/99
Bromodichloromethane	<.50		1	02/12/99
cis-1,3-Dichloropropene	<.50		1	02/12/99
4-Methyl-2-pentanone	<5.0		1	02/12/99
trans-1,3-Dichloropropene	<.50		1	02/12/99
1,1,2-Trichloroethane	<.50		1	02/12/99
Toluene	<.50		1	02/12/99
Dibromochloromethane	<.50		1	02/12/99
2-Hexanone	<5.0		1	02/12/99
Tetrachloroethene	<.50		1	02/12/99
Chlorobenzene	<.50		1	02/12/99



- Outside control limits J-Estimated value

Authorized: _____
Date: February 17, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5548
Samp. Description: 88-12C
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/04/99
Received: 02/05/99
Prepared: 02/12/99

Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Ethylbenzene	<.50		1	02/12/99	
Bromoform	<.50		1	02/12/99	
Xylene (total)	<.50		1	02/12/99	
Styrene	<.50		1	02/12/99	
1,1,2,2-Tetrachloroethane	<.50		1	02/12/99	
1,2-Dichloroethane-d4 (surrogate)	95.%	80-135	1	02/12/99	
Dibromofluoromethane (surrogate)	95.%	61-136	1	02/12/99	
Toluene-d8 (surrogate)	93.%	84-114	1	02/12/99	
Bromofluorobenzene (surrogate)	91.%	77-117	1	02/12/99	

Notes:

- Outside control limits J-Estimated value

Authorized: 
Date: February 17, 1999 Thomas Alexander

Tentatively Identified Compound (LSC) summary

Operator ID: SG Date Acquired: 12 Feb 1999 17:48
 File: C:\HPCHEM\1\DATA\J3677.D
 Sample: K5548
 Misc: 88-12C
 Method: C:\HPCHEM\1\METHODS\J212TCLW.M (RTE Integrator)
 Title: VOC's w/J & W DB-VRX: 0.25 mm x 60 m
 Library Searched: C:\DATABASE\NBS75K.L

TIC Top Hit name	RT	EstConc Units	Area	IntStd	ISRT	ISArea	ISConc
1,1-difluoroethane ✓	5.94	6.5 ug/L	1134940	ISTD01	14.98	1750760	10.0

J3677.D J212TCLW.M Tue Feb 16 08:21:59 1999

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

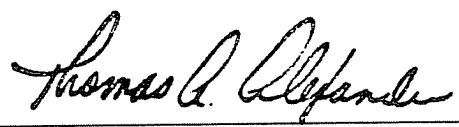
Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5549
Samp. Description: 85-7R
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/04/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog Limits Dilution	Analyzed Notes
Chloromethane	<1.0	1	02/12/99
Vinyl chloride	<1.0	1	02/12/99
Bromomethane	<1.0	1	02/12/99
Chloroethane	<1.0	1	02/12/99
Acetone	<10.	1	02/12/99
1,1-Dichloroethene	<.50	1	02/12/99
Methylene chloride	<.50	1	02/12/99
Carbon disulfide	.93 J	1	02/12/99
trans-1,2-Dichloroethene	<.50	1	02/12/99
1,1-Dichloroethane	<.50	1	02/12/99
2-Butanone	<10.	1	02/12/99
cis-1,2-Dichloroethene	J .21	1	02/12/99
Chloroform	<.50	1	02/12/99
1,2-Dichloroethane	<.50	1	02/12/99
1,1,1-Trichloroethane	<.50	1	02/12/99
Carbon tetrachloride	<.50	1	02/12/99
Benzene	<.50	1	02/12/99
1,2-Dichloropropane	<.50	1	02/12/99
Trichloroethene	<.50	1	02/12/99
Bromodichloromethane	<.50	1	02/12/99
cis-1,3-Dichloropropene	<.50	1	02/12/99
4-Methyl-2-pentanone	<5.0	1	02/12/99
trans-1,3-Dichloropropene	<.50	1	02/12/99
1,1,2-Trichloroethane	<.50	1	02/12/99
Toluene	<.50	1	02/12/99
Dibromochloromethane	<.50	1	02/12/99
2-Hexanone	<5.0	1	02/12/99
Tetrachloroethene	<.50	1	02/12/99
Chlorobenzene	<.50	1	02/12/99

- Outside control limits J-Estimated value

Authorized: 
Date: February 17, 1999 Thomas Alexander

**O'Brien & Gere
Laboratories, Inc.**

**Analytical Results
Method: 8260**

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155


Sample: K5549
Samp. Description: 85-7R
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/04/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Ethylbenzene	<.50		1	02/12/99	
Bromoform	<.50		1	02/12/99	
Xylene (total)	<.50		1	02/12/99	
Styrene	<.50		1	02/12/99	
1,1,2,2-Tetrachloroethane	<.50		1	02/12/99	
1,2-Dichloroethane-d4 (surrogate)	93.%	80-135	1	02/12/99	
Dibromofluoromethane (surrogate)	97.%	61-136	1	02/12/99	
Toluene-d8 (surrogate)	99.%	84-114	1	02/12/99	
Bromofluorobenzene (surrogate)	90.%	77-117	1	02/12/99	

Notes:

Outside control limits J-Estimated value

Authorized: 

Date: February 17, 1999 Thomas Alexander

Tentatively Identified Compound (LSC) summary

Operator ID: SG Date Acquired: 12 Feb 1999 18:25
 Sample File: C:\HPCHEM\1\DATA\J3678.D
 Name: K5549
 Misc: 85-7R
 Method: C:\HPCHEM\1\METHODS\J212TCLW.M (RTE Integrator)
 Title: VOC's w/J & W DB-VRX: 0.25 mm x 60 m
 Library Searched: C:\DATABASE\NBS75K.L

TIC Top Hit name	RT	EstConc	Units	Area	IntStd	ISRT	ISArea	ISConc
1,2-difur dioxide ✓	5.94	9.5	ug/L	1645900	ISTD01	14.97	1732960	10.0

J3678.D J212TCLW.M Tue Feb 16 08:24:46 1999

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5550
Samp. Description: URS-7D
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/04/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Chloromethane	<1.0		1	02/12/99	
Vinyl chloride	<1.0		1	02/12/99	
Bromomethane	<1.0		1	02/12/99	
Chloroethane	<1.0		1	02/12/99	
Acetone	J 6.0		1	02/12/99	
1,1-Dichloroethene	<.50		1	02/12/99	
Methylene chloride	<.50		1	02/12/99	
Carbon disulfide	1.3	J	1	02/12/99	
trans-1,2-Dichloroethene	<.50		1	02/12/99	
1,1-Dichloroethane	<.50		1	02/12/99	
2-Butanone	<10.		1	02/12/99	
cis-1,2-Dichloroethene	<.50		1	02/12/99	
Chloroform	<.50		1	02/12/99	
1,2-Dichloroethane	<.50		1	02/12/99	
1,1,1-Trichloroethane	<.50		1	02/12/99	
Carbon tetrachloride	<.50		1	02/12/99	
Benzene	<.50		1	02/12/99	
1,2-Dichloropropane	<.50		1	02/12/99	
Trichloroethene	<.50		1	02/12/99	
Bromodichloromethane	<.50		1	02/12/99	
cis-1,3-Dichloropropene	<.50		1	02/12/99	
4-Methyl-2-pentanone	<5.0		1	02/12/99	
trans-1,3-Dichloropropene	<.50		1	02/12/99	
1,1,2-Trichloroethane	<.50		1	02/12/99	
Toluene	<.50		1	02/12/99	
Dibromochloromethane	<.50		1	02/12/99	
2-Hexanone	<5.0		1	02/12/99	
Tetrachloroethene	<.50		1	02/12/99	
Chlorobenzene	<.50		1	02/12/99	

- Outside control limits J-Estimated value

Authorized:

Date: February 17, 1999 Thomas Alexander

Thomas A. Alexander

**O'Brien & Gere
Laboratories, Inc.**

**Analytical Results
Method: 8260**

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155


Sample: K5550
Samp. Description: URS-7D
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/04/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
% Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Ethylbenzene	<.50		1	02/12/99	
Bromoform	<.50		1	02/12/99	
Xylene (total)	<.50		1	02/12/99	
Styrene	<.50		1	02/12/99	
1,1,2,2-Tetrachloroethane	<.50		1	02/12/99	
1,2-Dichloroethane-d4 (surrogate)	94.%	80-135	1	02/12/99	
Dibromofluoromethane (surrogate)	96.%	61-136	1	02/12/99	
Toluene-d8 (surrogate)	98.%	84-114	1	02/12/99	
Bromofluorobenzene (surrogate)	92.%	77-117	1	02/12/99	

Notes:

Outside control limits J-Estimated value

Authorized: 

Date: February 17, 1999 Thomas Alexander

Tentatively Identified Compound (LSC) summary

Operator ID: SG Date Acquired: 12 Feb 1999 19:02
 File: C:\HPCHEM\1\DATA\J3679.D
 Sample: K5550
 Misc: URS-7D
 Method: C:\HPCHEM\1\METHODS\J212TCLW.M (RTE Integrator)
 Title: VOC's w/J & W DB-VRX: 0.25 mm x 60 m
 Library Searched: C:\DATABASE\NBS75K.L

TIC Top Hit name	RT	EstConc	Units	Area	IntStd	ISRT	ISArea	ISConc
1,1-difluoroethane ✓	5.94	11.7	ug/L	2033860	ISTD01	14.97	1740160	10.0

J3679.D J212TCLW.M Tue Feb 16 08:26:43 1999

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5551
Samp. Description: 85-5R
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/04/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Chloromethane	<1.0		1	02/12/99	
Vinyl chloride	<1.0		1	02/12/99	
Bromomethane	<1.0		1	02/12/99	
Chloroethane	<1.0		1	02/12/99	
Acetone	<10.		1	02/12/99	
1,1-Dichloroethene	<.50		1	02/12/99	
Methylene chloride	<.50		1	02/12/99	
Carbon disulfide	<.50	J-.16	1	02/12/99	
trans-1,2-Dichloroethene	<.50		1	02/12/99	
1,1-Dichloroethane	<.50		1	02/12/99	
2-Butanone	<10.		1	02/12/99	
cis-1,2-Dichloroethene	<.50		1	02/12/99	
Chloroform	<.50		1	02/12/99	
1,2-Dichloroethane	<.50		1	02/12/99	
1,1,1-Trichloroethane	<.50		1	02/12/99	
Carbon tetrachloride	<.50		1	02/12/99	
Benzene	<.50		1	02/12/99	
1,2-Dichloropropane	<.50		1	02/12/99	
Trichloroethene	<.50		1	02/12/99	
Bromodichloromethane	<.50		1	02/12/99	
cis-1,3-Dichloropropene	<.50		1	02/12/99	
4-Methyl-2-pentanone	<5.0		1	02/12/99	
trans-1,3-Dichloropropene	<.50		1	02/12/99	
1,1,2-Trichloroethane	<.50		1	02/12/99	
Toluene	<.50		1	02/12/99	
Dibromochloromethane	<.50		1	02/12/99	
2-Hexanone	<5.0		1	02/12/99	
Tetrachloroethene	<.50		1	02/12/99	
Chlorobenzene	<.50		1	02/12/99	

- Outside control limits J-Estimated value

Authorized:

Date: February 17, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5551
Samp. Description: 85-5R
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/04/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Ethylbenzene	<.50		1	02/12/99	
Bromoform	<.50		1	02/12/99	
Xylene (total)	<.50		1	02/12/99	
Styrene	<.50		1	02/12/99	
1,1,2,2-Tetrachloroethane	<.50		1	02/12/99	
1,2-Dichloroethane-d4 (surrogate)	95.%	80-135	1	02/12/99	
Dibromofluoromethane (surrogate)	93.%	61-136	1	02/12/99	
Toluene-d8 (surrogate)	99.%	84-114	1	02/12/99	
Bromofluorobenzene (surrogate)	90.%	77-117	1	02/12/99	

Notes:

- Outside control limits J-Estimated value

Authorized:

Date: February 17, 1999 Thomas Alexander

Tentatively Identified Compound (LSC) summary

Operator ID: SG Date Acquired: 12 Feb 1999 19:40

File: C:\HPCHEM\1\DATA\J3680.D

me: K5551

Misc: 85-5R

Method: C:\HPCHEM\1\METHODS\J212TCLW.M (RTE Integrator)

File: VOC's w/J & W DB-VRX: 0.25 mm x 60 m

Library Searched: C:\DATABASE\NBS75K.L

TIC Top Hit name	RT	EstConc Units	Area	IntStd	ISRT	ISArea	ISConc
1,2-dichloroethane ✓	5.94	5.7 ug/L	985458	ISTD01	14.97	1716360	10.0

J3680.D J212TCLW.M Tue Feb 16 08:26:53 1999

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155


Sample: K5552
Samp. Description: URS-5D
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/04/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog Limits Dilution	Analyzed Notes
Chloromethane	<1.0	1	02/12/99
Vinyl chloride	<1.0	1	02/12/99
Bromomethane	<1.0	1	02/12/99
Chloroethane	<1.0	1	02/12/99
Acetone	<10.	1	02/12/99
1,1-Dichloroethene	<.50	1	02/12/99
Methylene chloride	<.50	1	02/12/99
Carbon disulfide	<0.50 J-.14	1	02/12/99
trans-1,2-Dichloroethene	<.50	1	02/12/99
1,1-Dichloroethane	<.50	1	02/12/99
2-Butanone	<10.	1	02/12/99
cis-1,2-Dichloroethene	<.50	1	02/12/99
Chloroform	<.50	1	02/12/99
1,2-Dichloroethane	<.50	1	02/12/99
1,1,1-Trichloroethane	<.50	1	02/12/99
Carbon tetrachloride	<.50	1	02/12/99
Benzene	<.50	1	02/12/99
1,2-Dichloropropane	<.50	1	02/12/99
Trichloroethene	<.50	1	02/12/99
Bromodichloromethane	<.50	1	02/12/99
cis-1,3-Dichloropropene	<.50	1	02/12/99
4-Methyl-2-pentanone	<5.0	1	02/12/99
trans-1,3-Dichloropropene	<.50	1	02/12/99
1,1,2-Trichloroethane	<.50	1	02/12/99
Toluene	<.50	1	02/12/99
Dibromochloromethane	<.50	1	02/12/99
2-Hexanone	<5.0	1	02/12/99
Tetrachloroethene	<.50	1	02/12/99
Chlorobenzene	<.50	1	02/12/99

- Outside control limits J-Estimated value

Edits
3/10/99

Authorized: 
Date: February 17, 1999 Thomas Alexander

**O'Brien & Gere
Laboratories, Inc.**

**Analytical Results
Method: 8260**

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

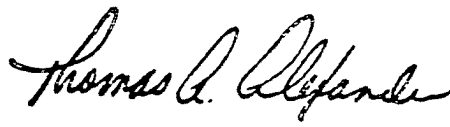
Sample: K5552
Samp. Description: URS-5D
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/04/99
Received: 02/05/99
Prepared: 02/12/99
Matrix: Water
QC Batch: 021299W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Ethylbenzene	<.50		1	02/12/99	
Bromoform	<.50		1	02/12/99	
Xylene (total)	<.50		1	02/12/99	
Styrene	<.50		1	02/12/99	
1,1,2,2-Tetrachloroethane	<.50		1	02/12/99	
1,2-Dichloroethane-d4 (surrogate)	95.%	80-135	1	02/12/99	
Dibromofluoromethane (surrogate)	94.%	61-136	1	02/12/99	
Toluene-d8 (surrogate)	97.%	84-114	1	02/12/99	
Bromofluorobenzene (surrogate)	90.%	77-117	1	02/12/99	

Notes:

Outside control limits J-Estimated value

Authorized: 
Date: February 17, 1999 Thomas Alexander

Tentatively Identified Compound (LSC) summary

Operator ID: SG Date Acquired: 12 Feb 1999 20:17
 Data File: C:\HPCHEM\1\DATA\J3681.D
 Sample: K5552
 Misc: URS-5D
 Method: C:\HPCHEM\1\METHODS\J212TCLW.M (RTE Integrator)
 Title: VOC's w/J & W DB-VRX: 0.25 mm x 60 m
 Library Searched: C:\DATABASE\NBS75K.L

TIC Top Hit name	RT	EstConc	Units	Area	IntStd	ISRT	ISArea	ISConc
1,2-difur dioxide ✓	5.94	4.6	ug/L	779480	ISTD01	14.97	1709520	10.0

J3681.D J212TCLW.M Tue Feb 16 08:27:04 1999

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY


Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5553
Samp. Description: Equipment Blank
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/05/99
Received: 02/05/99
Prepared: 02/17/99
Matrix: Water
QC Batch: 021799W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog Limits Dilution	Analyzed Notes
Chloromethane	<1.0	1	02/17/99
Vinyl chloride	<1.0	1	02/17/99
Bromomethane	<1.0	1	02/17/99
Chloroethane	<1.0	1	02/17/99
Acetone	<10.	1	02/17/99
1,1-Dichloroethene	<.50	1	02/17/99
Methylene chloride	<.50	1	02/17/99
Carbon disulfide	J .10 <i>3-10-99 no edit</i>	J .10	02/17/99
trans-1,2-Dichloroethene	<.50	1	02/17/99
1,1-Dichloroethane	<.50	1	02/17/99
2-Butanone	<10.	1	02/17/99
cis-1,2-Dichloroethene	<.50	1	02/17/99
Chloroform	<.50	1	02/17/99
1,2-Dichloroethane	<.50	1	02/17/99
1,1,1-Trichloroethane	<.50	1	02/17/99
Carbon tetrachloride	<.50	1	02/17/99
Benzene	<.50	1	02/17/99
1,2-Dichloropropane	<.50	1	02/17/99
Trichloroethene	<.50	1	02/17/99
Bromodichloromethane	<.50	1	02/17/99
cis-1,3-Dichloropropene	<.50	1	02/17/99
4-Methyl-2-pentanone	<5.0	1	02/17/99
trans-1,3-Dichloropropene	<.50	1	02/17/99
1,1,2-Trichloroethane	<.50	1	02/17/99
Toluene	<.50	1	02/17/99
Dibromochloromethane	<.50	1	02/17/99
2-Hexanone	<5.0	1	02/17/99
Tetrachloroethene	<.50	1	02/17/99
Chlorobenzene	<.50	1	02/17/99

- Outside control limits J-Estimated value

Authorized: 
Date: February 19, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5553
Samp. Description: Equipment Blank
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

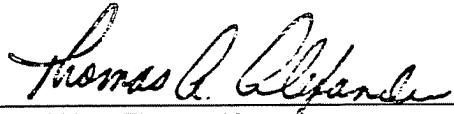
Collected: 02/05/99
Received: 02/05/99
Prepared: 02/17/99

Matrix: Water
QC Batch: 021799W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Ethylbenzene	<.50		1	02/17/99	
Bromoform	<.50		1	02/17/99	
Xylene (total)	<.50		1	02/17/99	
Styrene	<.50		1	02/17/99	
1,1,2,2-Tetrachloroethane	<.50		1	02/17/99	
1,2-Dichloroethane-d4 (surrogate)	94.%	80-135	1	02/17/99	
Dibromofluoromethane (surrogate)	94.%	61-136	1	02/17/99	
Toluene-d8 (surrogate)	92.%	84-114	1	02/17/99	
Bromofluorobenzene (surrogate)	90.%	77-117	1	02/17/99	

Notes:

Outside control limits J-Estimated value

Authorized: 
Date: February 19, 1999 Thomas Alexander

Operator ID: SG Date Acquired: 17 Feb 1999 17:14
 File: C:\HPCHEM\1\DATA\J3699.D
 Name: K5553
 Misc: Equipment Blank
 Method: C:\HPCHEM\1\METHODS\J217TCLW.M (RTE Integrator)
 Sample: VOC's w/J & W DB-VRX: 0.25 mm x 60 m
 Library Searched: C:\DATABASE\NBS75K.L

35

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY


Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5554
Samp. Description: URS-14D
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/05/99
Received: 02/05/99
Prepared: 02/17/99
Matrix: Water
QC Batch: 021799W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog Limits Dilution	Analyzed Notes
Chloromethane	<1.0	1	02/17/99
Vinyl chloride	<1.0	1	02/17/99
Bromomethane	<1.0	1	02/17/99
Chloroethane	<1.0	1	02/17/99
Acetone	<10.	1	02/17/99
1,1-Dichloroethene	<.50	1	02/17/99
Methylene chloride	<.50	1	02/17/99
Carbon disulfide	1.1	1	02/17/99
trans-1,2-Dichloroethene	<.50	1	02/17/99
1,1-Dichloroethane	<.50	1	02/17/99
2-Butanone	<10.	1	02/17/99
cis-1,2-Dichloroethene	<.50	1	02/17/99
Chloroform	<.50	1	02/17/99
1,2-Dichloroethane	<.50	1	02/17/99
1,1,1-Trichloroethane	<.50	1	02/17/99
Carbon tetrachloride	<.50	1	02/17/99
Benzene	<.50	1	02/17/99
1,2-Dichloropropane	<.50	1	02/17/99
Trichloroethene	<.50	1	02/17/99
Bromodichloromethane	<.50	1	02/17/99
cis-1,3-Dichloropropene	<.50	1	02/17/99
4-Methyl-2-pentanone	<5.0	1	02/17/99
trans-1,3-Dichloropropene	<.50	1	02/17/99
1,1,2-Trichloroethane	<.50	1	02/17/99
Toluene	<.50	1	02/17/99
Dibromochloromethane	<.50	1	02/17/99
2-Hexanone	<5.0	1	02/17/99
Tetrachloroethene	<.50	1	02/17/99
Chlorobenzene	<.50	1	02/17/99

- Outside control limits J-Estimated value

Authorized: 
Date: February 19, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5554
Samp. Description: URS-14D
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/05/99
Received: 02/05/99
Prepared: 02/17/99
Matrix: Water
QC Batch: 021799W1
% Solids:
Purge volume: 25 mL

Parameter	Result	Surrog Limits	Dilution	Analyzed	Notes
Ethylbenzene	<.50	J	1	02/17/99	
Bromoform	<.50	J	1	02/17/99	
Xylene (total)	<.50	J	1	02/17/99	
Styrene	<.50	J	1	02/17/99	
1,1,2,2-Tetrachloroethane	<.50	J	1	02/17/99	
1,2-Dichloroethane-d4 (surrogate)	90.%	80-135	1	02/17/99	
Dibromofluoromethane (surrogate)	90.%	61-136	1	02/17/99	
Toluene-d8 (surrogate)	89.%	84-114	1	02/17/99	
Bromofluorobenzene (surrogate)	83.%	77-117	1	02/17/99	

Notes:

Signature
3-15-99

- Outside control limits J-Estimated value

Authorized: _____

Date: February 19, 1999 Thomas Alexander

Signature of Thomas Alexander

5000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

Tentatively Identified Compound (LSC) summary

Operator ID: SG Date Acquired: 17 Feb 1999 17:51
 File: C:\HPCHEM\1\DATA\J3700.D
 me: K5554
 Misc: URS-14D
 Method: C:\HPCHEM\1\METHODS\J217TCLW.M (RTE Integrator)
 Title: VOC's w/J & W DB-VRX: 0.25 mm x 60 m
 Library Searched: C:\DATABASE\NBS75K.L

TIC Top Hit name	RT	EstConc	Units	Area	IntStd	ISRT	ISArea	ISConc
hydrochloric Acid 1	5.61	1.7	ug/L	285267	ISTD01	14.97	1630620	10.0
sulfur dioxide 2	5.94	3.9	ug/L	638502	ISTD01	14.97	1630620	10.0
1-Propanethiol 3	12.62	1.3	ug/L	204761	ISTD01	14.97	1630620	10.0

J3700.D J217TCLW.M Fri Feb 19 09:07:59 1999

1 Unknown
 2 ✓
 3 ✓

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5555
Samp. Description: URS-14I
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/05/99
Received: 02/05/99
Prepared: 02/17/99
Matrix: Water
QC Batch: 021799W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog Limits Dilution	Analyzed Notes
Chloromethane	<1.0	1	02/17/99
Vinyl chloride	<1.0	1	02/17/99
Bromomethane	<1.0	1	02/17/99
Chloroethane	<1.0	1	02/17/99
Acetone	<10.	1	02/17/99
1,1-Dichloroethene	<.50	1	02/17/99
Methylene chloride	<.50	1	02/17/99
Carbon disulfide	<6.50 J-.28	1	02/17/99
trans-1,2-Dichloroethene	<.50	1	02/17/99
1,1-Dichloroethane	<.50	1	02/17/99
2-Butanone	<10.	1	02/17/99
cis-1,2-Dichloroethene	<.50	1	02/17/99
Chloroform	<.50	1	02/17/99
1,2-Dichloroethane	<.50	1	02/17/99
1,1,1-Trichloroethane	<.50	1	02/17/99
Carbon tetrachloride	<.50	1	02/17/99
Benzene	<.50	1	02/17/99
1,2-Dichloropropane	<.50	1	02/17/99
Trichloroethene	<.50	1	02/17/99
Bromodichloromethane	<.50	1	02/17/99
cis-1,3-Dichloropropene	<.50	1	02/17/99
4-Methyl-2-pentanone	<5.0	1	02/17/99
trans-1,3-Dichloropropene	<.50	1	02/17/99
1,1,2-Trichloroethane	<.50	1	02/17/99
Toluene	<.50	1	02/17/99
Dibromochloromethane	<.50	1	02/17/99
2-Hexanone	<5.0	1	02/17/99
Tetrachloroethene	<.50	1	02/17/99
Chlorobenzene	<.50	1	02/17/99

Edits
gm
3-10-99

- Outside control limits J-Estimated value

Authorized: Thomas A. Alexander
Date: February 19, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155


Sample: K5555
Samp. Description: URS-141
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/05/99
Received: 02/05/99
Prepared: 02/17/99
Matrix: Water
QC Batch: 021799W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Ethylbenzene	<.50		1	02/17/99	
Bromoform	<.50		1	02/17/99	
Xylene (total)	<.50		1	02/17/99	
Styrene	<.50		1	02/17/99	
1,1,2,2-Tetrachloroethane	<.50		1	02/17/99	
1,2-Dichloroethane-d4 (surrogate)	85.%	80-135	1	02/17/99	
Dibromofluoromethane (surrogate)	89.%	61-136	1	02/17/99	
Toluene-d8 (surrogate)	76.%	# 84-114	1	02/17/99	
Bromofluorobenzene (surrogate)	81.%	77-117	1	02/17/99	

Notes:

Outside control limits J-Estimated value

Authorized: 
Date: February 19, 1999 Thomas Alexander

Tentatively Identified Compound (LSC) summary

Operator ID: SG Date Acquired: 17 Feb 1999 18:29

File: C:\HPCHEM\1\DATA\J3701.D

me: K5555

Misc: URS-14I

Method: C:\HPCHEM\1\METHODS\J217TCLW.M (RTE Integrator)

File: VOC's w/J & W DB-VRX: 0.25 mm x 60 m

Library Searched: C:\DATABASE\NBS75K.L

TIC Top Hit name	RT	EstConc	Units	Area	IntStd	ISRT	ISArea	ISConc
1fur dioxide ✓	5.94	2.5	ug/L	406050	ISTD01	14.97	1609470	10.0

J3701.D J217TCLW.M Fri Feb 19 09:08:10 1999

O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5556
Samp. Description: QC Trip Blank
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/03/99
Received: 02/05/99
Prepared: 02/17/99

Matrix: Water
QC Batch: 021799W1
%Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed Notes
		Limits	Dilution	
Chloromethane	<1.0		1	02/17/99
Vinyl chloride	<1.0		1	02/17/99
Bromomethane	<1.0		1	02/17/99
Chloroethane	<1.0		1	02/17/99
Acetone	<10.		1	02/17/99
1,1-Dichloroethene	<.50		1	02/17/99
Methylene chloride	<.50		1	02/17/99
Carbon disulfide	<.50		1	02/17/99
trans-1,2-Dichloroethene	<.50		1	02/17/99
1,1-Dichloroethane	<.50		1	02/17/99
2-Butanone	<10.		1	02/17/99
cis-1,2-Dichloroethene	<.50		1	02/17/99
Chloroform	<.50		1	02/17/99
1,2-Dichloroethane	<.50		1	02/17/99
1,1,1-Trichloroethane	<.50		1	02/17/99
Carbon tetrachloride	<.50		1	02/17/99
Benzene	<.50		1	02/17/99
1,2-Dichloropropane	<.50		1	02/17/99
Trichloroethene	<.50		1	02/17/99
Bromodichloromethane	<.50		1	02/17/99
cis-1,3-Dichloropropene	<.50		1	02/17/99
4-Methyl-2-pentanone	<5.0		1	02/17/99
trans-1,3-Dichloropropene	<.50		1	02/17/99
1,1,2-Trichloroethane	<.50		1	02/17/99
Toluene	<.50		1	02/17/99
Dibromochloromethane	<.50		1	02/17/99
2-Hexanone	<5.0		1	02/17/99
Tetrachloroethene	<.50		1	02/17/99
Chlorobenzene	<.50		1	02/17/99

- Outside control limits J-Estimated value

Authorized: _____

Date: February 19, 1999 Thomas Alexander



O'Brien & Gere Laboratories, Inc.

Analytical Results Method: 8260

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

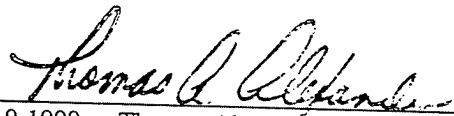
Sample: K5556
Sample Description: QC Trip Blank
Instrument: HP5973 GCMS#3
Units: ug/L
Number of analytes: 38

Collected: 02/03/99
Received: 02/05/99
Prepared: 02/17/99
Matrix: Water
QC Batch: 021799W1
% Solids:
Purge volume: 25 mL

Parameter	Result	Surrog		Analyzed	Notes
		Limits	Dilution		
Ethylbenzene	<.50		1	02/17/99	
Bromoform	<.50		1	02/17/99	
Xylene (total)	<.50		1	02/17/99	
Styrene	<.50		1	02/17/99	
1,1,2,2-Tetrachloroethane	<.50		1	02/17/99	
1,2-Dichloroethane-d4 (surrogate)	105.%	80-135	1	02/17/99	
Dibromofluoromethane (surrogate)	108.%	61-136	1	02/17/99	
Toluene-d8 (surrogate)	107.%	84-114	1	02/17/99	
Bromofluorobenzene (surrogate)	99.%	77-117	1	02/17/99	

Notes:

Outside control limits J-Estimated value

Authorized: 
Date: February 19, 1999 Thomas Alexander

Tentatively Identified Compound (LSC) summary

Operator ID: SG Date Acquired: 17 Feb 1999 16:37
Data File: C:\HPCHEM\1\DATA\J3698.D
Name: K5556
Sample: QC Trip Blank
Method: C:\HPCHEM\1\METHODS\J217TCLW.M (RTE Integrator)
Sample: VOC's w/J & W DB-VRX: 0.25 mm x 60 m
Library Searched: C:\DATABASE\NBS75K.L

TIC Top Hit name	RT	EstConc	Units	Area	IntStd	ISRT	ISArea	ISConc

J3698.D J217TCLW.M								

Fri Feb 19 09:07:28 1999

O'Brien & Gere Laboratories, Inc.

Analytical Results Trace Metals

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5544
Sample Description: URS-9D
Units: mg/L

Collected: 02/03/99 Matrix: Water
Received: 02/05/99 %Solids:
Number of analytes: 23

Parameter	Result	Method	Prepared	Analyzed	QC Batch	Dilut. Note
Aluminum	<.1	6010	02/18/99	02/18/99	021899W1	1
Antimony	<.005	6010	02/18/99	02/18/99	021899W1	1
Arsenic	<.005	6010	02/18/99	02/18/99	021899W1	1
Barium	<.02	6010	02/18/99	02/18/99	021899W1	1
Beryllium	<.003	6010	02/18/99	02/18/99	021899W1	1
Cadmium	<.001	6010	02/18/99	02/18/99	021899W1	1
Calcium	200.	6010	02/18/99	02/18/99	021899W1	1
Chromium	<.01	6010	02/18/99	02/18/99	021899W1	1
Cobalt	<.025	6010	02/18/99	02/18/99	021899W1	1
Copper	<.01	6010	02/18/99	02/18/99	021899W1	1
Iron	.07	6010	02/18/99	02/18/99	021899W1	1
Lead	<.005	6010	02/18/99	02/18/99	021899W1	1
Magnesium	72.	6010	02/18/99	02/18/99	021899W1	1
Manganese	.01	6010	02/18/99	02/18/99	021899W1	1
Mercury	<.0002	7470	02/17/99	02/17/99	021799W1	1
Nickel	<.05	6010	02/18/99	02/18/99	021899W1	1
Potassium	<5.	6010	02/18/99	02/19/99	021899W1	1
Selenium	<.005	6010	02/18/99	02/18/99	021899W1	1
Silver	<.01	6010	02/18/99	02/18/99	021899W1	1
Sodium	38.	6010	02/18/99	02/18/99	021899W1	1
Thallium	<.001	7841	02/18/99	02/18/99	021899W2	1
Vanadium	<.05	6010	02/18/99	02/18/99	021899W1	1
Zinc	<.01	6010	02/18/99	02/18/99	021899W1	1

Notes:

*Edw
3-10-99*

Thomas A. Alexander

1-Estimated value

Authorized: _____
Date: February 19, 1999 Thomas Alexander

5000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

O'Brien & Gere Laboratories, Inc.

Analytical Results Trace Metals

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5545
Samp. Description: URS-9I
Units: mg/L

Collected: 02/03/99
Received: 02/05/99
Matrix: Water
%Solids:
Number of analytes: 23

Parameter	Result	Method	Prepared	Analyzed	QC Batch	Dilut. Note
Aluminum	.2	6010	02/18/99	02/18/99	021899W1	1
Antimony	<.005	6010	02/18/99	02/18/99	021899W1	1
Arsenic	<.005	6010	02/18/99	02/18/99	021899W1	1
Barium	<.02	6010	02/18/99	02/18/99	021899W1	1
Beryllium	<.003	6010	02/18/99	02/18/99	021899W1	1
Cadmium	<.001	6010	02/18/99	02/18/99	021899W1	1
Calcium	160.	6010	02/18/99	02/18/99	021899W1	1
Chromium	.01	6010	02/18/99	02/18/99	021899W1	1
Cobalt	<.025	6010	02/18/99	02/18/99	021899W1	1
Copper	<.01	6010	02/18/99	02/18/99	021899W1	1
Iron	.59	6010	02/18/99	02/18/99	021899W1	1
Lead	<.005	6010	02/18/99	02/18/99	021899W1	1
Magnesium	70.	6010	02/18/99	02/18/99	021899W1	1
Manganese	.05	6010	02/18/99	02/18/99	021899W1	1
Mercury	<.0002	7470	02/17/99	02/17/99	021799W1	1
Nickel	<.05	6010	02/18/99	02/18/99	021899W1	1
Potassium	<5.	6010	02/18/99	02/19/99	021899W1	1
Selenium	<.005	6010	02/18/99	02/18/99	021899W1	1
Silver	<.01	6010	02/18/99	02/18/99	021899W1	1
Sodium	39.	6010	02/18/99	02/18/99	021899W1	1
Thallium	<.001	7841	02/18/99	02/18/99	021899W2	1
Vanadium	<.05	6010	02/18/99	02/18/99	021899W1	1
Zinc	<.01	6010	02/18/99	02/18/99	021899W1	1

Notes:

Edt
3-10-99

Estimated value

Authorized: *Thomas G. Alexander*
Date: February 19, 1999 Thomas Alexander

5000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

O'Brien & Gere Laboratories, Inc.

Analytical Results Trace Metals

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5546
Samp. Description: Blind Duplicate
Units: mg/L

Collected: 02/03/99
Received: 02/05/99
Matrix: Water
%Solids:
Number of analytes: 23

Parameter	Result	Method	Prepared	Analyzed	QC Batch	Dilut.	Note
Aluminum	<.1	6010	02/18/99	02/18/99	021899W1	1	
Antimony	<.005	6010	02/18/99	02/18/99	021899W1	1	
Arsenic	<.005	6010	02/18/99	02/18/99	021899W1	1	
Barium	<.02	6010	02/18/99	02/18/99	021899W1	1	
Beryllium	<.003	6010	02/18/99	02/18/99	021899W1	1	
Cadmium	<.001	6010	02/18/99	02/18/99	021899W1	1	
Calcium	200.	6010	02/18/99	02/18/99	021899W1	1	
Chromium	<.01	6010	02/18/99	02/18/99	021899W1	1	
Cobalt	<.025	6010	02/18/99	02/18/99	021899W1	1	
Copper	<.01	6010	02/18/99	02/18/99	021899W1	1	
Iron	.07	6010	02/18/99	02/18/99	021899W1	1	
Lead	<.005	6010	02/18/99	02/18/99	021899W1	1	
Magnesium	72.	6010	02/18/99	02/18/99	021899W1	1	
Manganese	.01	6010	02/18/99	02/18/99	021899W1	1	
Mercury	<.0002	7470	02/17/99	02/17/99	021799W1	1	
Nickel	<.05	6010	02/18/99	02/18/99	021899W1	1	
Potassium	<5.	6010	02/18/99	02/19/99	021899W1	1	
Selenium	<.005	6010	02/18/99	02/18/99	021899W1	1	
Silver	<.01	6010	02/18/99	02/18/99	021899W1	1	
Sodium	38.	6010	02/18/99	02/18/99	021899W1	1	
Thallium	<.001	7841	02/18/99	02/18/99	021899W2	1	
Vanadium	<.05	6010	02/18/99	02/18/99	021899W1	1	
Zinc	<.01	6010	02/18/99	02/18/99	021899W1	1	

Notes:

Edit
JH
3-10-99

Estimated value

Authorized:

Date: February 19, 1999 Thomas Alexander

Thomas G. Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Trace Metals

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5547
Sample Description: 88-12D
Units: mg/L

Collected: 02/04/99 Matrix: Water
Received: 02/05/99 %Solids:
Number of analytes: 23

Parameter	Result	Method	Prepared	Analyzed	QC Batch	Dilut. Note
Aluminum	<.1	6010	02/18/99	02/18/99	021899W1	1
Antimony	<.005	6010	02/18/99	02/18/99	021899W1	1
Arsenic	<.005	6010	02/18/99	02/18/99	021899W1	1
Barium	<.02	6010	02/18/99	02/18/99	021899W1	1
Beryllium	<.003	6010	02/18/99	02/18/99	021899W1	1
Cadmium	<.001	6010	02/18/99	02/18/99	021899W1	1
Calcium	630.	6010	02/18/99	02/18/99	021899W1	1
Chromium	.09	6010	02/18/99	02/18/99	021899W1	1
Cobalt	<.025	6010	02/18/99	02/18/99	021899W1	1
Copper	<.01	6010	02/18/99	02/18/99	021899W1	1
Iron	.65	6010	02/18/99	02/18/99	021899W1	1
Lead	<.005	6010	02/18/99	02/18/99	021899W1	1
Magnesium	160.	6010	02/18/99	02/18/99	021899W1	1
Manganese	.05	6010	02/18/99	02/18/99	021899W1	1
Mercury	<.0002	7470	02/17/99	02/17/99	021799W1	1
Nickel	.07	6010	02/18/99	02/18/99	021899W1	1
Potassium	9.	6010	02/18/99	02/19/99	021899W1	1
Selenium	<.005	6010	02/18/99	02/18/99	021899W1	1
Silver	<.01	6010	02/18/99	02/18/99	021899W1	1
Sodium	250.	6010	02/18/99	02/18/99	021899W1	1
Thallium	<.001	7841	02/18/99	02/18/99	021899W2	1
Vanadium	<.05	6010	02/18/99	02/18/99	021899W1	1
Zinc	<.01	6010	02/18/99	02/18/99	021899W1	1

Notes:

Edie
3-10-99

-Estimated value

Authorized:

Date: February 19, 1999 Thomas Alexander

Thomas A. Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Trace Metals

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5548
Samp. Description: 88-12C
Units: mg/L

Collected: 02/04/99
Received: 02/05/99
Matrix: Water
%Solids:
Number of analytes: 23

Parameter	Result	Method	Prepared	Analyzed	QC Batch	Dilut.	Note
Aluminum	.6	6010	02/18/99	02/18/99	021899W1	1	
Antimony	<.005	6010	02/18/99	02/18/99	021899W1	1	
Arsenic	.012	6010	02/18/99	02/18/99	021899W1	1	
Barium	<.02	6010	02/18/99	02/18/99	021899W1	1	
Beryllium	<.003	6010	02/18/99	02/18/99	021899W1	1	
Cadmium	<.001	6010	02/18/99	02/18/99	021899W1	1	
Calcium	76.	6010	02/18/99	02/18/99	021899W1	1	
Chromium	.02	6010	02/18/99	02/18/99	021899W1	1	
Cobalt	<.025	6010	02/18/99	02/18/99	021899W1	1	
Copper	<.01	6010	02/18/99	02/18/99	021899W1	1	
Iron	1.6	6010	02/18/99	02/18/99	021899W1	1	
Lead	<.005	6010	02/18/99	02/18/99	021899W1	1	
Magnesium	100.	6010	02/18/99	02/18/99	021899W1	1	
Manganese	.04	6010	02/18/99	02/18/99	021899W1	1	
Mercury	<.0002	7470	02/17/99	02/17/99	021799W1	1	
Nickel	<.05	6010	02/18/99	02/18/99	021899W1	1	
Potassium	<5.	6010	02/18/99	02/19/99	021899W1	1	
Selenium	<.005	6010	02/18/99	02/18/99	021899W1	1	
Silver	<.01	6010	02/18/99	02/18/99	021899W1	1	
Sodium	42.	6010	02/18/99	02/18/99	021899W1	1	
Thallium	<.001	7841	02/18/99	02/18/99	021899W2	1	
Vanadium	<.05	6010	02/18/99	02/18/99	021899W1	1	
Zinc	<.01	6010	02/18/99	02/18/99	021899W1	1	

Notes:

Edith
3-10-01/01

.-Estimated value

Authorized:

Thomas A. Alexander

Date: February 19, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Trace Metals

Client: Frontier Chemical
Project: Pendleton Site
Project Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5553
Sample Description: Equipment Blank
Units: mg/L

Collected: 02/05/99
Received: 02/05/99
Matrix: Water
%Solids:
Number of analytes: 23

Parameter	Result	Method	Prepared	Analyzed	QC Batch	Dilut. Note
Aluminum	<.1	6010	02/18/99	02/18/99	021899W1	1
Antimony	<.005	6010	02/18/99	02/18/99	021899W1	1
Arsenic	<.005	6010	02/18/99	02/18/99	021899W1	1
Barium	<.02	6010	02/18/99	02/18/99	021899W1	1
Beryllium	<.003	6010	02/18/99	02/18/99	021899W1	1
Cadmium	<.001	6010	02/18/99	02/18/99	021899W1	1
Calcium	<.1	6010	02/18/99	02/18/99	021899W1	1
Chromium	<.01	6010	02/18/99	02/18/99	021899W1	1
Cobalt	<.025	6010	02/18/99	02/18/99	021899W1	1
Copper	<.01	6010	02/18/99	02/18/99	021899W1	1
Iron	<.05	6010	02/18/99	02/18/99	021899W1	1
Lead	<.005	6010	02/18/99	02/18/99	021899W1	1
Magnesium	<.3	6010	02/18/99	02/18/99	021899W1	1
Manganese	<.01	6010	02/18/99	02/18/99	021899W1	1
Mercury	<.0002	7470	02/17/99	02/17/99	021799W1	1
Nickel	<.05	6010	02/18/99	02/18/99	021899W1	1
Potassium	<5.	6010	02/18/99	02/19/99	021899W1	1
Selenium	<.005	6010 J	02/18/99	02/18/99	021899W1	1
Silver	<.01	6010	02/18/99	02/18/99	021899W1	1
Sodium	<.3	6010	02/18/99	02/18/99	021899W1	1
Thallium	<.001	7841	02/18/99	02/18/99	021899W2	1
Vanadium	<.05	6010	02/18/99	02/18/99	021899W1	1
Zinc	<.01	6010	02/18/99	02/18/99	021899W1	1

Notes:

*Edt
JH
3-10-99*

-Estimated value

Authorized: _____

Date: February 19, 1999 Thomas Alexander

Thomas A. Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Trace Metals

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5554
Sample Description: URS-14D
Units: mg/L

Collected: 02/05/99 Matrix: Water
Received: 02/05/99 %Solids:
Number of analytes: 23

Parameter	Result	Method	Prepared	Analyzed	QC Batch	Dilut. Note
Aluminum	<.1	6010	02/18/99	02/18/99	021899W1	1
Antimony	<.005	6010	02/18/99	02/18/99	021899W1	1
Arsenic	<.005	6010	02/18/99	02/18/99	021899W1	1
Barium	.04	6010	02/18/99	02/18/99	021899W1	1
Beryllium	<.003	6010	02/18/99	02/18/99	021899W1	1
Cadmium	<.001	6010	02/18/99	02/18/99	021899W1	1
Calcium	280.	6010	02/18/99	02/18/99	021899W1	1
Chromium	<.01	6010	02/18/99	02/18/99	021899W1	1
Cobalt	<.025	6010	02/18/99	02/18/99	021899W1	1
Copper	<.01	6010	02/18/99	02/18/99	021899W1	1
Iron	.08	6010	02/18/99	02/18/99	021899W1	1
Lead	<.005	6010	02/18/99	02/18/99	021899W1	1
Magnesium	71.	6010	02/18/99	02/18/99	021899W1	1
Manganese	<.01	6010	02/18/99	02/18/99	021899W1	1
Mercury	<.0002	7470	02/17/99	02/17/99	021799W1	1
Nickel	<.05	6010	02/18/99	02/18/99	021899W1	1
Potassium	<5.	6010	02/18/99	02/19/99	021899W1	1
Selenium	<.005	6010	02/18/99	02/18/99	021899W1	1
Silver	<.01	6010	02/18/99	02/18/99	021899W1	1
Sodium	48.	6010	02/18/99	02/18/99	021899W1	1
Thallium	<.001	7841	02/18/99	02/18/99	021899W2	1
Vanadium	<.05	6010	02/18/99	02/18/99	021899W1	1
Zinc	<.01	6010	02/18/99	02/18/99	021899W1	1

Notes:

Edix
3-10-99

-Estimated value

Authorized:

Date: February 19, 1999 Thomas Alexander

Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Trace Metals

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5555
Samp. Description: URS-14I
Units: mg/L

Collected: 02/05/99
Received: 02/05/99
Matrix: Water
%Solids:
Number of analytes: 23

Parameter	Result	Method	Prepared	Analyzed	QC Batch	Dilut. Note
Aluminum	.3	6010	02/18/99	02/18/99	021899W1	1
Antimony	<.005	6010	02/18/99	02/18/99	021899W1	1
Arsenic	.005	6010	02/18/99	02/18/99	021899W1	1
Barium	.04	6010	02/18/99	02/18/99	021899W1	1
Beryllium	<.003	6010	02/18/99	02/18/99	021899W1	1
Cadmium	<.001	6010	02/18/99	02/18/99	021899W1	1
Calcium	26.	6010	02/18/99	02/18/99	021899W1	1
Chromium	<.01	6010	02/18/99	02/18/99	021899W1	1
Cobalt	<.025	6010	02/18/99	02/18/99	021899W1	1
Copper	<.01	6010	02/18/99	02/18/99	021899W1	1
Iron	.32	6010	02/18/99	02/18/99	021899W1	1
Lead	<.005	6010	02/18/99	02/18/99	021899W1	1
Magnesium	23.	6010	02/18/99	02/18/99	021899W1	1
Manganese	<.01	6010	02/18/99	02/18/99	021899W1	1
Mercury	<.0002	7470	02/17/99	02/17/99	021799W1	1
Nickel	<.05	6010	02/18/99	02/18/99	021899W1	1
Potassium	6.	6010	02/18/99	02/19/99	021899W1	1
Selenium	<.005	6010	02/18/99	02/18/99	021899W1	1
Silver	<.01	6010	02/18/99	02/18/99	021899W1	1
Sodium	54.	6010	02/18/99	02/18/99	021899W1	1
Thallium	<.001	7841	02/18/99	02/18/99	021899W2	1
Vanadium	<.05	6010	02/18/99	02/18/99	021899W1	1
Zinc	<.01	6010	02/18/99	02/18/99	021899W1	1

Notes:

Edie
3-10-99

-Estimated value

Authorized: _____

Date: February 19, 1999 Thomas Alexander

Thomas A. Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Trace Metals

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5557
Samp. Description: 85-7R (Field Filtered)
Units: mg/L

Collected: 02/04/99
Received: 02/05/99
Matrix: Water
%Solids:
Number of analytes: 23

Parameter	Result	Method	Prepared	Analyzed	QC Batch	Dilut.	Note
Aluminum, filtered	<.1	6010	02/18/99	02/18/99	021899W1	1	
Antimony, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Arsenic, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Barium, filtered	<.1	6010	02/18/99	02/18/99	021899W1	1	
Beryllium, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Cadmium, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Calcium, filtered	400.	6010	02/18/99	02/18/99	021899W1	1	
Chromium, filtered	.01	6010	02/18/99	02/18/99	021899W1	1	
Cobalt, filtered	<.05	6010	02/18/99	02/18/99	021899W1	1	
Copper, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Iron, filtered	.17	6010	02/18/99	02/18/99	021899W1	1	
Lead, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Magnesium, filtered	140.	6010	02/18/99	02/18/99	021899W1	1	
Manganese, filtered	.08	6010	02/18/99	02/18/99	021899W1	1	
Mercury, filtered	<.0002	7470	02/17/99	02/17/99	021799W1	1	
Nickel, filtered	<.05	6010	02/18/99	02/18/99	021899W1	1	
Potassium, filtered	6.	6010	02/18/99	02/19/99	021899W1	1	
Selenium, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Silver, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Sodium, filtered	74.	6010	02/18/99	02/18/99	021899W1	1	
Thallium, filtered	<.001	7841	02/18/99	02/18/99	021899W2	1	
Vanadium, filtered	<.05	6010	02/18/99	02/18/99	021899W1	1	
Zinc, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	

Notes:

*Edits JH
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*Edits JH
3-10-99*

-Estimated value

Authorized: Thomas A. Alexander
Date: February 19, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Trace Metals

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5558
Samp. Description: URS-7D (Field Filtered)
Units: mg/L

Collected: 02/04/99
Received: 02/05/99
Matrix: Water
%Solids:
Number of analytes: 23

Parameter	Result	Method	Prepared	Analyzed	QC Batch	Dilut.	Note
Aluminum, filtered	<.1	6010	02/18/99	02/18/99	021899W1	1	
Antimony, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Arsenic, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Barium, filtered	<.1	6010	02/18/99	02/18/99	021899W1	1	
Beryllium, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Cadmium, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Calcium, filtered	400.	6010	02/18/99	02/18/99	021899W1	1	
Chromium, filtered	.01	6010	02/18/99	02/18/99	021899W1	1	
Cobalt, filtered	<.05	6010	02/18/99	02/18/99	021899W1	1	
Copper, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Iron, filtered	.10	6010	02/18/99	02/18/99	021899W1	1	
Lead, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Magnesium, filtered	130.	6010	02/18/99	02/18/99	021899W1	1	
Manganese, filtered	.05	6010	02/18/99	02/18/99	021899W1	1	
Mercury, filtered	<.0002	7470	02/17/99	02/17/99	021799W1	1	
Nickel, filtered	<.05	6010	02/18/99	02/18/99	021899W1	1	
Potassium, filtered	<5.	6010	02/18/99	02/19/99	021899W1	1	
Selenium, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Silver, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Sodium, filtered	74.	6010	02/18/99	02/18/99	021899W1	1	
Thallium, filtered	<.001	7841	02/18/99	02/18/99	021899W2	1	
Vanadium, filtered	<.05	6010	02/18/99	02/18/99	021899W1	1	
Zinc, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	

Notes:

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3-10-99*

-Estimated value

Authorized: Thomas C. Alexander
Date: February 19, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Trace Metals

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5559
Samp. Description: 85-5R (Field Filtered)
Units: mg/L

Collected: 02/04/99
Received: 02/05/99
Matrix: Water
%Solids:
Number of analytes: 23

Parameter	Result	Method	Prepared	Analyzed	QC Batch	Dilut.	Note
Aluminum, filtered	<.1	6010	02/18/99	02/18/99	021899W1	1	
Antimony, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Arsenic, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Barium, filtered	<.1	6010	02/18/99	02/18/99	021899W1	1	
Beryllium, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Cadmium, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Calcium, filtered	130.	6010	02/18/99	02/18/99	021899W1	1	
Chromium, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Cobalt, filtered	<.05	6010	02/18/99	02/18/99	021899W1	1	
Copper, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Iron, filtered	<.05	6010	02/18/99	02/18/99	021899W1	1	
Lead, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Magnesium, filtered	59.	6010	02/18/99	02/18/99	021899W1	1	
Manganese, filtered	<.05	6010	02/18/99	02/18/99	021899W1	1	
Mercury, filtered	<.0002	7470	02/17/99	02/17/99	021799W1	1	
Nickel, filtered	<.05	6010	02/18/99	02/18/99	021899W1	1	
Potassium, filtered	<5.	6010	02/18/99	02/19/99	021899W1	1	
Selenium, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Silver, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Sodium, filtered	52.	6010	02/18/99	02/18/99	021899W1	1	
Thallium, filtered	<.001	7841	02/18/99	02/18/99	021899W2	1	
Vanadium, filtered	<.05	6010	02/18/99	02/18/99	021899W1	1	
Zinc, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	

Notes:

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3-10-99

-Estimated value

Authorized: Thomas Alexander
Date: February 19, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Trace Metals

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5560
Samp. Description: URS-5D (Field Filtered)
Units: mg/L

Collected: 02/04/99
Received: 02/05/99
Matrix: Water
%Solids:
Number of analytes: 23

Parameter	Result	Method	Prepared	Analyzed	QC Batch	Dilut.	Note
Aluminum, filtered	<.1	6010	02/18/99	02/18/99	021899W1	1	
Antimony, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Arsenic, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Barium, filtered	<.1	6010	02/18/99	02/18/99	021899W1	1	
Beryllium, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Cadmium, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Calcium, filtered	510.	6010	02/18/99	02/18/99	021899W1	1	
Chromium, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Cobalt, filtered	.85	6010	02/18/99	02/18/99	021899W1	1	
Copper, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Iron, filtered	<.05	6010	02/18/99	02/18/99	021899W1	1	
Lead, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Magnesium, filtered	76.	6010	02/18/99	02/18/99	021899W1	1	
Manganese, filtered	.07	6010	02/18/99	02/18/99	021899W1	1	
Mercury, filtered	<.0002	7470	02/17/99	02/17/99	021799W1	1	
Nickel, filtered	.09	6010	02/18/99	02/18/99	021899W1	1	
Potassium, filtered	5.	6010	02/18/99	02/19/99	021899W1	1	
Selenium, filtered	<.005	6010	02/18/99	02/18/99	021899W1	1	
Silver, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	
Sodium, filtered	120.	6010	02/18/99	02/18/99	021899W1	1	
Thallium, filtered	<.001	7841	02/18/99	02/18/99	021899W2	1	
Vanadium, filtered	<.05	6010	02/18/99	02/18/99	021899W1	1	
Zinc, filtered	<.01	6010	02/18/99	02/18/99	021899W1	1	

Notes:

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-Estimated value

Authorized: Thomas Alexander
Date: February 19, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Wet Chemistry

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5544
Samp. Description: URS-9D

Collected: 02/03/99
Received: 02/05/99 13:50
Matrix: Water

Parameter	Result Units	Method	Prepared Analyzed	QC Batch	Note
Total cyanide	<.01 mg/L	9010B/9014	02/12/99 02/16/99	021299W21	

Notes:

Sample: K5545
Samp. Description: URS-9I

Collected: 02/03/99
Received: 02/05/99 13:50
Matrix: Water

Parameter	Result Units	Method	Prepared Analyzed	QC Batch	Note
Total cyanide	<.01 mg/L	9010B/9014	02/12/99 02/16/99	021299W21	

Notes:


Sample: K5546
Samp. Description: Blind Duplicate

Collected: 02/03/99
Received: 02/05/99 13:50
Matrix: Water

Parameter	Result Units	Method	Prepared Analyzed	QC Batch	Note
Total cyanide	<.01 mg/L	9010B/9014	02/12/99 02/16/99	021299W21	

Notes:

Estimated value

Authorized: 
Date: February 21, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Wet Chemistry

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5547
Sample Description: 88-12D

Collected: 02/04/99
Received: 02/05/99 13:50
Matrix: Water

Parameter	Result Units	Method	Prepared Analyzed	QC Batch	Note
Total cyanide	<.01 mg/L	9010B/9014	02/12/99 02/16/99	021299W21	

Notes:

Sample: K5548
Sample Description: 88-12C

Collected: 02/04/99
Received: 02/05/99 13:50
Matrix: Water

Parameter	Result Units	Method	Prepared Analyzed	QC Batch	Note
Total cyanide	<.01 mg/L	9010B/9014	02/12/99 02/16/99	021299W21	

Notes:

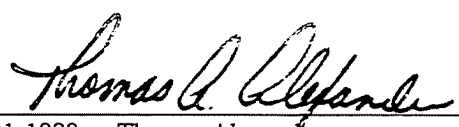
Sample: K5549
Sample Description: 85-7R

Collected: 02/04/99
Received: 02/05/99 13:50
Matrix: Water

Parameter	Result Units	Method	Prepared Analyzed	QC Batch	Note
Total cyanide	<.01 mg/L	9010B/9014	02/12/99 02/16/99	021299W21	

Notes:

Estimated value

Authorized: 
Date: February 21, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Wet Chemistry

Client: Frontier Chemical
Project: Pendleton Site
Proj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5550
Sample Description: URS-7D

Collected: 02/04/99
Received: 02/05/99 13:50
Matrix: Water

Parameter	Result Units	Method	Prepared Analyzed	QC Batch	Note
Total cyanide	<.01 mg/L	9010B/9014	02/12/99 02/16/99	021299W21	

Notes:

Sample: K5551
Sample Description: 85-5R

Collected: 02/04/99
Received: 02/05/99 13:50
Matrix: Water

Parameter	Result Units	Method	Prepared Analyzed	QC Batch	Note
Total cyanide	<.01 mg/L	9010B/9014	02/12/99 02/16/99	021299W21	

Notes:

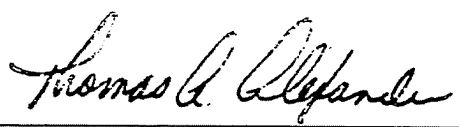
Sample: K5552
Sample Description: URS-5D

Collected: 02/04/99
Received: 02/05/99 13:50
Matrix: Water

Parameter	Result Units	Method	Prepared Analyzed	QC Batch	Note
Total cyanide	<.01 mg/L	9010B/9014	02/12/99 02/16/99	021299W21	

Notes:

-Estimated value

Authorized: 
Date: February 21, 1999 Thomas Alexander

O'Brien & Gere Laboratories, Inc.

Analytical Results Wet Chemistry

Client: Frontier Chemical
Project: Pendleton Site
roj. Desc: Niagara County, NY

Job No.: 5829.001.517
Certification NY No.: 10155

Sample: K5553
Sample Description: Equipment Blank

Collected: 02/05/99
Received: 02/05/99 13:50
Matrix: Water

Parameter	Result Units	Method	Prepared Analyzed	QC Batch	Note
Total cyanide	<.01 mg/L	9010B/9014	02/12/99 02/16/99	021299W21	

Notes:

Sample: K5554
Sample Description: URS-14D

Collected: 02/05/99
Received: 02/05/99 13:50
Matrix: Water

Parameter	Result Units	Method	Prepared Analyzed	QC Batch	Note
Total cyanide	<.01 mg/L	9010B/9014	02/12/99 02/16/99	021299W21	

Notes:

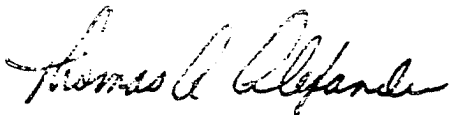
Sample: K5555
Sample Description: URS-14I

Collected: 02/05/99
Received: 02/05/99 13:50
Matrix: Water

Parameter	Result Units	Method	Prepared Analyzed	QC Batch	Note
Total cyanide	<.01 mg/L	9010B/9014	02/16/99 02/16/99	021299W21	

Notes:

Estimated value

Authorized: 
Date: February 21, 1999 Thomas Alexander

Quality Control Results

O'Brien & Gere Laboratories, Inc.

Quality Control Summary Matrix Spike/Matrix Spike Duplicate Method: 8260

Sample: K5554

Sample Description: URS-14D

Units: ug/L

Instrument: HP5973 GCMS#3

Matrix: Water

%Solids:

Number of analytes: 38

Parameter	Dilution	Result	Spike Added	MS Value	%R	MSD Value	%R	RPD Limits	Note
Chloromethane	1	<1	10	8.72	87	9.33	93	78-122	7 0-13
Vinyl chloride	1	<1	10	9.09	91	9.31	93	85-123	2 0-13
Bromomethane	1	<1	10	8.87	89	9.61	96	71-127	8 0-16
Chloroethane	1	<1	10	8.87	89	8.97	90	88-121	1 0-13
Acetone	1	<10	20	18.89	94	20.71	104	46-151	9 0-28
1,1-Dichloroethene	1	<.5	10	7.84 #	78	8.3 #	83	85-124	6 0-10
Methylene chloride	1	<.5	10	9.05	91	9.52	95	81-116	5 0-10
Carbon disulfide	1	1.11	10	24.21 #	231	22.24 #	211	80-130	8 0-10
trans-1,2-Dichloroethene	1	<.5	10	8.7 #	87	9.21	92	90-118	6 0-10
1,1-Dichloroethane	1	<.5	10	9.12	91	9.51	95	91-120	4 0-11
n-Butane	1	<10	20	19.17	96	21.01	105	77-129	9 0-25
cis-1,2-Dichloroethene	1	<.5	10	9.1	91	9.46	95	88-118	4 0-12
Chloroform	1	<.5	10	8.8	88	9.18	92	87-116	4 0-10
1,2-Dichloroethane	1	<.5	10	8.83	88	9.43	94	82-115	7 0-12
1,1,1-Trichloroethane	1	<.5	10	8.94 #	89	9.43	94	91-120	5 0-11
Carbon tetrachloride	1	<.5	10	12.45 #	125	12.9 #	129	93-120	4 0-10
Benzene	1	<.5	10	9.38	94	9.87	99	89-118	5 0-10
1,2-Dichloropropane	1	<.5	10	9.25	93	9.67	97	90-113	4 0-10
Trichloroethene	1	<.5	10	8.91	89	9.55	96	84-120	7 0-11
Bromodichloromethane	1	<.5	10	16.78 #	168	17.64 #	176	87-117	5 0-10
cis-1,3-Dichloropropene	1	<.5	10	5.88 #	59	5.57 #	56	87-117	5 0-10
1-Methyl-2-pentanone	1	<5	20	17.66	88	18.75	94	67-137	6 0-16

J-Estimated value #-Outside limits

5000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

O'Brien & Gere Laboratories, Inc.

Quality Control Summary Matrix Spike/Matrix Spike Duplicate Method: 8260

Sample: K5554

Sample Description: URS-14D

Units: ug/L

Instrument: HP5973 GCMS#3

Matrix: Water

%Solids:

Number of analytes: 38

Parameter	Dilution	Result	Spike Added	MS Value	%R	MSD Value	%R	RPD Limits	Note
trans-1,3-Dichloropropene	1	<.5	10	5.25 #	53	5.03 #	50	84-122	4 0-12
1,1,2-Trichloroethane	1	<.5	10	9.36	94	9.66	97	84-123	3 0-12
Toluene	1	<.5	10	9.74	97	10.35	104	88-120	6 0-10
Dibromochloromethane	1	<.5	10	17.03 #	170	17.52 #	175	84-119	3 0-11
2-Hexanone	1	<.5	20	17.95	90	20.21	101	63-143	12 0-16
Tetrachloroethene	1	<.5	10	9.34	93	9.85	99	88-119	5 0-11
Chlorobenzene	1	<.5	10	9.09	91	9.63	96	85-116	6 0-10
Ethylbenzene	1	<.5	10	9.29	93	9.77	98	89-119	5 0-10
Bromoforn	1	<.5	10	19.55 #	196	19.5 #	195	72-126	0 0-13
Xylene (total)	1	<.5	30	28.44	95	30.01	100	88-118	5 0-10
Etyrene	1	<.5	10	3.41 #	34	3.61 #	36	86-116	6 0-10
1,1,2,2-Tetrachloroethane	1	<.5	10	9.11	91	9.82	98	76-132	8 0-13
1,2-Dichloroethane-d4 (surrogate)	1	89.63%			91		92	80-135	
Dibromofluoromethane (surrogate)	1	90%			93		97	61-136	
Toluene-d8 (surrogate)	1	89.06%			93		99	84-114	
Bromofluorobenzene (surrogate)	1	82.56%			91		95	77-117	

Notes:

J-Estimated value #-Outside limits

5000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

O'Brien & Gere Laboratories, Inc.

Quality Control Summary Matrix Spike/Matrix Spike Duplicate Trace Metals

Sample: K5554

Sample Description: URS-14D

Matrix: Water Units: mg/L

% Solids: Number of analytes: 23

Parameter	MS Result	Sample Result	Spike Added	MSD Result	MS %R	MSD %R	MS/MSD Limits	RPD		Method	Note
								Limits	RPD		
Aluminum	.9342	<.1	1.000	.9426	93	94	82-116	1	0-15	6010	
Antimony	.1922	<.005	.200	.1904	96	95	78-110	1	0-10	6010	
Arsenic	.1917	<.005	.200	.1937	96	97	83-109	1	0-10	6010	
Barium	.2247	.0367	.200	.2248	94	94	81-108	0	0-10	6010	
Beryllium	.1848	<.003	.200	.1849	92	92	81-114	0	0-10	6010	
Bismuth	.1789	<.001	.200	.1799	89	90	75-104	1	0-10	6010	
Calcium	285.0000	276.1	10.000	282.0000	89	59	65-123	1	0-10	6010	35
Chromium	.1935	<.01	.200	.1938	97	97	79-112	0	0-10	6010	
Cobalt	.1782	<.025	.200	.1792	89	90	81-106	1	0-10	6010	
Copper	.2002	<.01	.200	.2000	100	100	87-110	0	0-10	6010	
Iron	.9965	.0773	1.000	.9888	92	91	70-117	1	0-10	6010	
Lead	.1845	<.005	.200	.1855	92	93	81-111	1	0-10	6010	
Magnesium	80.6600	71.11	10.000	79.9700	96	89	69-119	1	0-10	6010	
Manganese	.1969	<.01	.200	.1970	98	99	76-110	0	0-10	6010	
Mercury	.0011	<.0002	.001	.0010	111	101	73-131	9	0-19	7470	
Nickel	.1819	<.05	.200	.1840	91	92	80-110	1	0-10	6010	
Potassium	13.3930	13.1926	10.000	13.5880	102	104	71-130	1	0-10	6010	
Selenium	.0642	<.005	.200	.0746	32	37	78-115	15	0-19	6010	2
Silver	.0468	<.01	.050	.0471	94	94	82-103	1	0-10	6010	
Sodium	57.9300	47.71	10.000	57.3000	102	96	70-143	1	0-10	6010	
Thallium	.0452	<.001	.050	.0431	90	86	64-122	5	0-10	7841	
Vanadium	.1883	<.05	.200	.1888	94	94	80-110	0	0-10	6010	
Zinc	.1926	<.01	.200	.1931	96	97	82-105	0	0-10	6010	

Notes:

2: Low recovery due to matrix interference.

35: Sample concentration was much greater than the concentration of the analyte in the spike.

1-Estimated value # -Outside limits

75000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

**Brien & Gere
Laboratories, Inc.**

**Quality Control Summary
Post Digestion Spike
Trace Metals**

Sample: K5554
Sample Description: URS-14D

Matrix: Water Units: mg/L
% Solids: Number of analytes: 22

Parameter	MS Result	Sample Result	Spike Added	MS %R	%R Limits	Method
Aluminum	.9848	<.1	1.000	98	82-116	6010
Antimony	.1978	<.005	.200	99	78-110	6010
Arsenic	.1957	<.005	.200	98	83-109	6010
Barium	.2271	.0367	.200	95	81-108	6010
Beryllium	.1970	<.003	.200	93	81-114	6010
Cadmium	.1823	<.001	.200	91	75-104	6010
Calcium	281.6000	276.1	10.000 #	55	65-123	6010
Chromium	.1970	<.01	.200	9	79-112	6010
Cobalt	.1820	<.025	.200	91	81-106	6010
Copper	.2023	<.01	.200	101	87-110	6010
Iron	1.0232	.0773	1.000	95	70-117	6010
Lead	.1888	<.005	.200	94	81-111	6010
Magnesium	80.0800	71.11	10.000	90	69-119	6010
Manganese	.2001	<.01	.200	100	76-110	6010
Nickel	.1854	<.05	.200	93	80-110	6010
Potassium	13.8480	13.1926	10.000	107	71-130	6010
Selenium	.1878	<.005	.200	94	78-115	6010
Silver	.0478	<.01	.050	96	82-103	6010
Sodium	57.8900	47.71	10.000	102	70-143	6010
Thallium	.1897	<.005	.200	95	85-110	6010
Vanadium	.1913	<.05	.200	96	80-110	6010
Zinc	.1974	<.01	.200	99	82-105	6010

#-Estimated value #-Outside limits

O'Brien & Gere Laboratories, Inc.

Quality Control Summary Duplicates Trace Metals

Sample: K5554

Samp. Description: URS-14D

Matrix: Water
%Solids:

Units: mg/L
Number of analytes: 23

Parameter	Sample Result	Duplicate Result	RPD	RPD Limits	Method	Note
Aluminum	<.1	<.1			6010	
Antimony	<.005	<.005			6010	
Arsenic	<.005	<.005			6010	
Barium	.0367	.0364	1	0-11	6010	
Beryllium	<.003	<.003			6010	
Cadmium	<.001	<.001			6010	
Calcium	276.1	275.2	0	0-10	6010	
Chromium	<.01	<.01			6010	
Cobalt	<.025	<.025			6010	
Copper	<.01	<.01			6010	
Iron	.0773	.0974	# 23	0-16	6010	42
Lead	<.005	<.005			6010	
Magnesium	71.11	70.88	0	0-10	6010	
Manganese	<.01	<.01			6010	
Mercury	<.0002	<.0002			7470	
Nickel	<.05	<.05			6010	
Potassium	J3.1926	<5			6010	
Selenium	<.005	<.005			6010	
Silver	<.01	<.01			6010	
Sodium	47.71	47.89	0	0-10	6010	
Thallium	<.001	<.001			7841	
Vanadium	<.05	<.05			6010	
Zinc	<.01	<.01			6010	

Notes:

42: Sample result is less than 5xPQL and the difference between sample/duplicate is less than PQL

J-Estimated value #-Outside limits

5000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

O'Brien & Gere Laboratories, Inc.

Quality Control Summary Matrix Spike/Matrix Spike Duplicate Wet Chemistry

Sample: K5554

Sample Description: URS-14D

Matrix: Water

Number of analytes: 1

Parameter	MS Result	Sample Result	Spike Added	MSD Result	%R	MS/MSD Limits	MSD %R	RPD	RPD Limits	Units	Method	Note
Total cyanide	.0630	<.01	.050		126	70-131				mg/L	9010B/9014	

Notes:

-Estimated value # -Outside limits

7

6000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

Sample: K5554

Samp. Description: URS-14D

Number of analytes: 1

Parameter	Sample Result	Duplicate Result	RPD	Limits	Units	Note
Total cyanide	<.01	<.01			mg/L	

Notes:

-Estimated value #-Outside limits

5000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

Brien & Gere Laboratories, Inc.

Quality Control Summary Laboratory Control Sample GC/MS Volatile Organics

Sample: L021299W1
Analyzed: 02/12/99

QC Batch: 021299W1
Instrument: HP5973 GCMS#3
Number of analytes: 38

Parameter	LCS	Spike		QC		Note
	Result	Added	Units	%R	Limits	
Chloromethane	3.5400		4 ug/L	89	63-122	
Vinyl chloride	3.8400		4 ug/L	96	62-134	
Bromomethane	3.6600		4 ug/L	92	52-141	
Chloroethane	3.9100		4 ug/L	98	74-128	
Acetone	4.6300		4 ug/L	116	42-155	
1,1-Dichloroethene	4.0200		4 ug/L	101	89-135	
Methylene chloride	3.7900		4 ug/L	95	82-125	
Carbon disulfide	4.2100		4 ug/L	105	74-133	
trans-1,2-Dichloroethene	3.9900		4 ug/L	100	84-147	
1,1-Dichloroethane	4.1200		4 ug/L	103	84-129	
2-Butanone	3.4500		4 ug/L	86	62-135	
cis-1,2-Dichloroethene	4.0700		4 ug/L	102	70-131	
Chloroform	3.9400		4 ug/L	99	84-123	
1,2-Dichloroethane	4.3400		4 ug/L	109	80-124	
1,1,1-Trichloroethane	4.2500		4 ug/L	106	85-137	
Carbon tetrachloride	4.2400		4 ug/L	106	88-134	
Benzene	4.1000		4 ug/L	103	84-126	
1,2-Dichloropropane	4.1600		4 ug/L	104	86-122	
Trichloroethene	4.1400		4 ug/L	104	87-131	
Bromodichloromethane	4.0900		4 ug/L	102	86-123	
cis-1,3-Dichloropropene	4.2300		4 ug/L	106	76-139	
-Methyl-2-pentanone	3.3000		4 ug/L	83	62-131	
trans-1,3-Dichloropropene	4.0800		4 ug/L	102	73-146	
2-Trichloroethane	3.9300		4 ug/L	98	80-126	
1,1,1,2-Tetrachloroethane	4.2500		4 ug/L	106	87-126	
Dibromochloromethane	3.9900		4 ug/L	100	79-122	
2-Hexanone	3.7800		4 ug/L	95	58-127	
Tetrachloroethene	4.2100		4 ug/L	105	82-132	
Chlorobenzene	4.0700		4 ug/L	102	86-122	
Ethylbenzene	4.1900		4 ug/L	105	80-127	
Bromoform	3.9400		4 ug/L	99	75-128	
Xylene (total)	13.0200		12 ug/L	109	78-128	
Styrene	3.6600		4 ug/L	92	79-124	
1,1,2,2-Tetrachloroethane	4.1200		4 ug/L	103	71-128	
1,2-Dichloroethane-d4 (surrogate)			%	96	80-135	
Dibromofluoromethane (surrogate)			%	97	61-136	
Toluene-d8 (surrogate)			%	102	84-114	
Bromofluorobenzene (surrogate)			%	97	77-117	

Notes:

- Outside control limits

000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

O'Brien & Gere Laboratories, Inc.

Quality Control Summary Laboratory Control Sample Trace Metals

Sample: L021899W1
Analyzed: 02/18/99
Units: mg/L

QC Batch: 021899W1
Number of analytes: 26

Parameter	LCS Result	Spike Added	%R	QC Limits	Instrument Note
Aluminum	.9177	1	92	86-117	ICAP-61
Antimony	.9608	1	96	85-108	ICAP-61
Arsenic	.9672	1	97	89-105	ICAP-61
Barium	.9841	1	98	90-104	ICAP-61
Beryllium	.9564	1	96	90-111	ICAP-61
Boron	.9568	1	96	88-108	ICAP-61
Cadmium	.9594	1	96	89-104	ICAP-61
Calcium	9.5650	10	96	88-106	ICAP-61
Chromium	.9724	1	97	91-104	ICAP-61
Cobalt	.9702	1	97	91-107	ICAP-61
Copper	.9999	1	100	92-108	ICAP-61
Iron	.9722	1	97	89-108	ICAP-61
Lead	.9635	1	96	91-107	ICAP-61
Magnesium	9.5780	10	96	89-103	ICAP-61
Manganese	.9841	1	98	91-104	ICAP-61
Molybdenum	1.0069	1	101	91-107	ICAP-61
Nickel	.9797	1	98	91-107	ICAP-61
Selenium	.9218	1	92	88-108	ICAP-61
Silver	.1918	.2	96	84-106	ICAP-61
Sodium	9.5870	10	96	92-106	ICAP-61
Strontium	.9901	1	99	90-105	ICAP-61
Thallium	.9566	1	96	91-107	ICAP-61
Tin	.9977	1	100	81-117	ICAP-61
Titanium	.9931	1	99	92-107	ICAP-61
Vanadium	.9915	1	99	93-106	ICAP-61
Zinc	.9575	1	96	90-105	ICAP-61

Notes:

- Outside control limits

**O'Brien & Gere
Laboratories, Inc.**

**Quality Control Summary
Laboratory Control Sample
Trace Metals**

Sample: L021899W1
Analyzed: 02/19/99
Units: mg/L

QC Batch: 021899W1
Number of analytes: 1

<u>Parameter</u>	<u>LCS Result</u>	<u>Spike Added</u>	<u>%R</u>	<u>QC Limits</u>	<u>Instrument Note</u>
Potassium	9.5791	10	96	88-106	ICAP-61

Notes:

- Outside control limits

5000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

**O'Brien & Gere
Laboratories, Inc.**

**Quality Control Summary
Laboratory Control Sample
Trace Metals**

Sample: L021899W2
Analyzed: 02/18/99
Units: mg/L

QC Batch: 021899W2
Number of analytes: 1

<u>Parameter</u>	<u>LCS Result</u>	<u>Spike Added</u>	<u>%R</u>	<u>QC Limits</u>	<u>Instrument Note</u>
Thallium	.8924	1	89	82-108	PE5100

Notes:

- Outside control limits

3000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

**O'Brien & Gere
Laboratories, Inc.**

**Quality Control Summary
Laboratory Control Sample
Trace Metals**

Sample: L021799W1
Analyzed: 02/17/99
Units: mg/L

QC Batch: 021799W1
Number of analytes: 1

<u>Parameter</u>	<u>LCS Result</u>	<u>Spike Added</u>	<u>%R</u>	<u>QC Limits</u>	<u>Instrument Note</u>
Mercury	.0055	.005	110	81-114	PE3100

Notes:

- Outside control limits

5000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

**O'Brien & Gere
Laboratories, Inc.**

**Quality Control Summary
Laboratory Control Sample
Wet Chemistry**

Sample: L021299W21
Analyzed: 02/16/99

QC Batch: 021299W21
Number of parameters: 1

<u>Parameter</u>	<u>LCS</u> <u>Result</u>	<u>Spike</u> <u>Added Units</u>	<u>%R</u>	<u>QC</u> <u>Limits</u>	<u>Instrument Note</u>
Total cyanide	.3940	.4 mg/L	99	80-120	SPEC 21

Notes:

- Outside control limits

5000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

O'Brien & Gere Laboratories, Inc.

Quality Control Summary Preparation Blank GC/MS Volatile Organics

Sample: PB021299W1

Analyzed: 02/12/99

Instrument: HP5973 GCMS#3

Number of analytes: 38

Parameter	Sample Result	Surrog Limits	Det. Limit	Units	QC Batch
Chloromethane	<1.			1 ug/L	021299W1
Vinyl chloride	<1.			1 ug/L	021299W1
Bromomethane	<1.			1 ug/L	021299W1
Chloroethane	<1.			1 ug/L	021299W1
Acetone	<10.			10 ug/L	021299W1
1,1-Dichloroethene	<.50			.5 ug/L	021299W1
Methylene chloride	J .12			.5 ug/L	021299W1
Carbon disulfide	<.50			.5 ug/L	021299W1
trans-1,2-Dichloroethene	<.50			.5 ug/L	021299W1
1,1-Dichloroethane	<.50			.5 ug/L	021299W1
2-Butanone	<10.			10 ug/L	021299W1
cis-1,2-Dichloroethene	<.50			.5 ug/L	021299W1
Chloroform	<.50			.5 ug/L	021299W1
1,2-Dichloroethane	<.50			.5 ug/L	021299W1
1,1,1-Trichloroethane	<.50			.5 ug/L	021299W1
Carbon tetrachloride	<.50			.5 ug/L	021299W1
Benzene	<.50			.5 ug/L	021299W1
1,2-Dichloropropane	<.50			.5 ug/L	021299W1
Trichloroethene	<.50			.5 ug/L	021299W1
Bromodichloromethane	<.50			.5 ug/L	021299W1
cis-1,3-Dichloropropene	<.50			.5 ug/L	021299W1
4-Methyl-2-pentanone	<5.0			5 ug/L	021299W1
trans-1,3-Dichloropropene	<.50			.5 ug/L	021299W1
1,1,2-Trichloroethane	<.50			.5 ug/L	021299W1
Toluene	<.50			.5 ug/L	021299W1
Dibromochloromethane	<.50			.5 ug/L	021299W1
2-Hexanone	<5.0			5 ug/L	021299W1
Tetrachloroethene	<.50			.5 ug/L	021299W1
Chlorobenzene	<.50			.5 ug/L	021299W1
Ethylbenzene	<.50			.5 ug/L	021299W1
Bromoform	<.50			.5 ug/L	021299W1
Xylene (total)	<.50			.5 ug/L	021299W1
Styrene	<.50			.5 ug/L	021299W1
1,1,2,2-Tetrachloroethane	<.50			.5 ug/L	021299W1
1,2-Dichloroethane-d4 (surrogate)	93.	80-135		.1 %	021299W1
Dibromofluoromethane (surrogate)	97.	61-136		.1 %	021299W1
Toluene-d8 (surrogate)	100.	84-114		.1 %	021299W1
Bromofluorobenzene (surrogate)	94.	77-117		.1 %	021299W1

Notes:

- Outside control limits J - Estimated value

5000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

Tentatively Identified Compound (LSC) summary

Operator ID: SG Date Acquired: 12 Feb 1999 14:41
Data File: C:\HPCHEM\1\DATA\J3672.D
Name: PB021299W1
Disc: V4286, 87
Method: C:\HPCHEM\1\METHODS\J212TCLW.M (RTE Integrator)
Title: VOC's w/J & W DB-VRX: 0.25 mm x 60 m
Library Searched: C:\DATABASE\NBS75K.L

TIC Top Hit name	RT	EstConc	Units	Area	IntStd	ISRT	ISArea	ISConc

J3672.D J212TCLW.M								

Tue Feb 16 08:20:45 1999

O'Brien & Gere Laboratories, Inc.

Quality Control Summary Preparation Blank GC/MS Volatile Organics

Sample: PB021799W1
Analyzed: 02/17/99

Instrument: HP5973 GCMS#3
Number of analytes: 38

Parameter	Sample Result	Surrog Limits	Det. Limit	Units	QC Batch
Chloromethane	<1.			1 ug/L	021799W1
Vinyl chloride	<1.			1 ug/L	021799W1
Bromomethane	<1.			1 ug/L	021799W1
Chloroethane	<1.			1 ug/L	021799W1
Acetone	<10.			10 ug/L	021799W1
1,1-Dichloroethene	<.50			.5 ug/L	021799W1
Methylene chloride	<.50			.5 ug/L	021799W1
Carbon disulfide	<.50			.5 ug/L	021799W1
trans-1,2-Dichloroethene	<.50			.5 ug/L	021799W1
1,1-Dichloroethane	<.50			.5 ug/L	021799W1
Butanone	<10.			10 ug/L	021799W1
cis-1,2-Dichloroethene	<.50			.5 ug/L	021799W1
Chloroform	<.50			.5 ug/L	021799W1
1,2-Dichloroethane	<.50			.5 ug/L	021799W1
1,1,1-Trichloroethane	<.50			.5 ug/L	021799W1
Carbon tetrachloride	<.50			.5 ug/L	021799W1
Benzene	<.50			.5 ug/L	021799W1
1,2-Dichloropropane	<.50			.5 ug/L	021799W1
Trichloroethene	<.50			.5 ug/L	021799W1
Bromodichloromethane	<.50			.5 ug/L	021799W1
cis-1,3-Dichloropropene	<.50			.5 ug/L	021799W1
4-Methyl-2-pentanone	<5.0			5 ug/L	021799W1
trans-1,3-Dichloropropene	<.50			.5 ug/L	021799W1
1,1,2-Trichloroethane	<.50			.5 ug/L	021799W1
Toluene	<.50			.5 ug/L	021799W1
Dibromochloromethane	<.50			.5 ug/L	021799W1
2-Hexanone	<5.0			5 ug/L	021799W1
Tetrachloroethene	<.50			.5 ug/L	021799W1
Chlorobenzene	<.50			.5 ug/L	021799W1
Ethylbenzene	<.50			.5 ug/L	021799W1
Bromoform	<.50			.5 ug/L	021799W1
Xylene (total)	<.50			.5 ug/L	021799W1
Styrene	<.50			.5 ug/L	021799W1
1,1,2,2-Tetrachloroethane	<.50			.5 ug/L	021799W1
1,2-Dichloroethane-d4 (surrogate)	86.	80-135	.1 %		021799W1
Dibromofluoromethane (surrogate)	91.	61-136	.1 %		021799W1
Toluene-d8 (surrogate)	95.	84-114	.1 %		021799W1
Bromofluorobenzene (surrogate)	89.	77-117	.1 %		021799W1

Notes:

- Outside control limits J - Estimated value

Tentatively Identified Compound (LSC) summary

Operator ID: SG Date Acquired: 17 Feb 1999 15:59
Data File: C:\HPCHEM\1\DATA\J3697.D
Sample Name: PB021799W1
Injection Volume: V4286, 87
Method: C:\HPCHEM\1\METHODS\J217TCLW.M (RTE Integrator)
Injection Volume: 0.25 mm x 60 m
Library Searched: C:\DATABASE\NBS75K.L

TIC Top Hit name	RT	EstConc	Units	Area	IntStd	ISRT	ISArea	ISConc

J3697.D J217TCLW.M			Fri Feb 19 09:07:13 1999					

**O'Brien & Gere
Laboratories, Inc.**

**Quality Control Summary
Preparation Blank
Trace Metals**

Sample: PB021899W1
Units: mg/L
Date analyzed: 02/18/99

QC Batch: 021899W1
Number of analytes: 26

<u>Parameter</u>	<u>Sample Result</u>	<u>Det. Limit</u>	<u>Instrument Note</u>
Aluminum	<.1	.1000	ICAP-61
Antimony	<.005	.0050	ICAP-61
Arsenic	<.005	.0050	ICAP-61
Barium	<.02	.0200	ICAP-61
Beryllium	<.003	.0030	ICAP-61
Boron	<.05	.0500	ICAP-61
Cadmium	<.001	.0010	ICAP-61
Calcium	<.1	.1000	ICAP-61
Chromium	<.01	.0100	ICAP-61
Cobalt	<.025	.0250	ICAP-61
Copper	<.01	.0100	ICAP-61
Iron	<.05	.0500	ICAP-61
Lead	<.005	.0050	ICAP-61
Magnesium	<.3	.3000	ICAP-61
Manganese	<.01	.0100	ICAP-61
Molybdenum	<.05	.0500	ICAP-61
Nickel	<.05	.0500	ICAP-61
Selenium	<.005	.0050	ICAP-61
Silver	<.01	.0100	ICAP-61
Sodium	<.3	.3000	ICAP-61
Strontium	<.05	.0500	ICAP-61
Thallium	<.005	.0050	ICAP-61
Tin	<.05	.0500	ICAP-61
Titanium	<.05	.0500	ICAP-61
Vanadium	<.05	.0500	ICAP-61
Zinc	<.01	.0100	ICAP-61

Notes:

J - Estimated value

**O'Brien & Gere
Laboratories, Inc.**

**Quality Control Summary
Preparation Blank
Trace Metals**

Sample: PB021899W1
Units: mg/L
Date analyzed: 02/19/99

QC Batch: 021899W1
Number of analytes: 1

<u>Parameter</u>	<u>Sample Result</u>	<u>Det. Limit</u>	<u>Instrument Note</u>
Potassium	<5.	5.000	ICAP-61

Notes:

J - Estimated value

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**O'Brien & Gere
Laboratories, Inc.**

**Quality Control Summary
Preparation Blank
Trace Metals**

Sample: PB021899W2
Units: mg/L
Date analyzed: 02/18/99

QC Batch: 021899W2
Number of analytes: 1

<u>Parameter</u>	<u>Sample Result</u>	<u>Det. Limit</u>	<u>Instrument Note</u>
Thallium	<.001	.0010	PE5100

Notes:

J - Estimated value

000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

**O'Brien & Gere
Laboratories, Inc.**

**Quality Control Summary
Preparation Blank
Trace Metals**

Sample: PB021799W1
Units: mg/L
Date analyzed: 02/17/99

QC Batch: 021799W1
Number of analytes: 1

<u>Parameter</u>	<u>Sample Result</u>	<u>Det. Limit</u>	<u>Instrument Note</u>
Mercury	<.0002	.0002	PE3100

Notes:

J - Estimated value

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**O'Brien & Gere
Laboratories, Inc.**

**Quality Control Summary
Preparation Blank
Wet Chemistry**

Sample: PB021299W21

Analyzed: 02/16/99

Number of analytes: 1

<u>Parameter</u>	<u>Sample Result</u>	<u>Det. Limit Units</u>	<u>QC Batch</u>	<u>Instrument Note</u>
Total cyanide	<.01	.0100 mg/L	021299W21	SPEC 21

Notes:

J - Estimated value

1000 Brittonfield Parkway / Suite 300, Box 4942 / Syracuse, NY 13221 / (315) 437-0200

O'BRIEN & GERE
Laboratories, Inc.

Volatile Organics
Method 8260

Internal Standard Summary

Client:	Frontier Chemical	CCC Data File:	J3668.D	Inst. I.D.:	#3MS10
Job No.:	5829.001.517	Date Analyzed:	2/12/99	Matrix:	WATER
Site:					

	Data File	ISTD 1		ISTD 2		ISTD 3	
		Area	R.T.	Area	R.T.	Area	R.T.
CCC STD	J3668.D	834779	14.97	633169	20.52	376371	25.66
Upper Limit		1669558	15.47	1266338	21.02	752742	26.16
Lower Limit		417390	14.47	316585	20.02	188186	25.16
Sample No.							
L021299W1	J3671.D	822984	14.97	628686	20.52	369710	25.67
PB021299W1	J3672.D	821341	14.98	603331	20.52	354526	25.67
K5544	J3673.D	778298	14.97	583308	20.52	348439	25.67
K5545	J3674.D	819714	14.98	596296	20.52	346372	25.67
K5546	J3675.D	826913	14.98	603011	20.52	348598	25.67
K5547	J3676.D	800328	14.98	590939	20.52	347742	25.67
K5548	J3677.D	817529	14.98	589996	20.52	339057	25.67
K5549	J3678.D	796369	14.97	591720	20.52	339071	25.67
K5550	J3679.D	808092	14.97	586204	20.52	336375	25.67
K5551	J3680.D	806471	14.97	578313	20.52	327950	25.67
K5552	J3681.D	805777	14.97	582237	20.52	328952	25.67

ISTD 1 Fluorobenzene
ISTD 2 Chlorobenzene-d5
ISTD 3 1,4-Dichlorobenzene-d4

Volatile Organics Method 8260

Client:	Frontier Chemical	CCC Data File:	J3692.D	Inst. I.D.:	#3MS10
Job No.:	5829.001.517	Date Analyzed:	2/17/99	Matrix:	WATER
Site:					

[illegible]

J3692.xls

Chain of Custody

External Chain of Custody

Client: O'Brien & Gere Engineers Inc.				Analysis/Method			
Project: Frontier Chemical - Penetration Site							
Sampled by: Charan O'Dell							
Client Contact: Jennifer Smith				Phone # (315) 437-6100			
Sample Description							
Sample Location	Date Collected	Time Collected	Sample Matrix	Comp. or Grab	No. of Containers		
URS-9D	02/03/99	1610	WATER	GRAB	5		
URS-9I	02/03/99	1705	WATER	GRAB	5		
BLIND DUPLICATE	02/03/99	---	WATER	GRAB	5		
88-12D	02/04/99	1045	WATER	GRAB	5		
88-12C	02/04/99	1145	WATER	GRAB	5		
85-7R	02/04/99	1430	WATER	GRAB	5		
URS-7D	02/04/99	1445	WATER	GRAB	5		
85-5R	02/04/99	1615	WATER	GRAB	5		
URS-5D	02/04/99	1635	WATER	GRAB	5		
Equipment blank	02/05/99	0830	WATER	GRAB	5		
URS-14D	02/05/99	0900	WATER	GRAB	5		
URS-14D MATRIX SPIKE	02/05/99	0900	WATER	GRAB	5		
Relinquished by: Charan O'Dell				Date: 02/05/99 Time: 1350			
Relinquished by:				Date: Time:			
Relinquished by:				Date: Time:			
Relinquished by:				Date: Time:			
Shipment Method:				Received by Lab: Mark F. Jackson			
				Date: 2/5/99 Time: 13:50			
				Airbill Number:			

Turnaround Time Required: _____

Routine _____
Rush (Specify) _____

Cooler Temperature: 50°

Client: O'Brien & Gere Engineers, Inc.
Project: Frontier Chemical - Penetration Site
Sampled by: Chawn Odeh
Client Contact: Jennifer Smith Phone # (315) 437-6100

Sample Description

[illegible]

Relinquished by: <i>Chawn Kelly</i>	Date: <i>02/05/99</i>	Time: <i>1350</i>	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received by:	Date:	Time:
Relinquished by:	Date:	Time:	Received by Lab: <i>Mark Jackson</i>	Date: <i>2/5/99</i>	Time: <i>13:50</i>
Shipment Method:			Airbill Number:		

Turnaround Time Required:

Routine ✓
Rush (Specify) _____

Comments:

Cooler Temperature: 50°

SAMPLE CONTROL RECORD

CLIENT: Frontier Chemical JOB #: 5829-001-S17 DATE RECEIVED: 02/08/99
Package PROJECT MANAGER: TIA SAMPLE NUMBER(S): K5544-5560
 ID #: 704

Laboratory Sample Number	Removed By	Date and Time Removed	Reason	Date and Time Returned
K5541-5554	D. Saint-Amar	12-12-99 0845	Cyanide	2-12-99 1335
K5544-52	S. Gung	12-12-99 1130	8260	12-12-99 16:30
K5552-56	S. Gung	12-17-99 19:30	8260	12-17-99 16:30
5544-48	D. ROBERTS	2-17-99 13:00	Hg	2-17-99 16:00
5553-55	D. ROBERTS	2-17-99 13:00	Hg	2-17-99 16:00
5557-60	D. ROBERTS	2-17-99 13:00	Hg	2-17-99 16:00
5544-48 K5553-55, K5557-60	C. Tran	2-18-99 10:00 AM	ICAP & GFAA digestion	2-18-99 11:00 AM
5554-48				
5555-48				
5556-48				

Internal Chain of Custody

QC Batch #: 021899601

Date Digested: 2/13/99

89

-ICP-METALS SAMPLE CONTROL LOG

2/14/64

Date Digested: 7/15/99

[illegible]

ATTACHMENT D

Frontier Chemical - Pendleton Site
March 1999

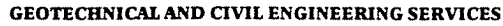
Attachment D – Site Maintenance Work Items and Field Observation Reports

D-1 Field Observation Reports

Frontier Chemical - Pendleton Site
March 1999

1 Field Observation Reports

- Field Observation Report Dated February 12, 1999



● VISIT OUR WEB SITE AT www.glynngroup.com / E-MAIL: ggeny@earthlink.net ●



FIELD OBSERVATION REPORT

PROJECT NO.: 94-1014-O REPORT NO.: 99-01 DATE: 4-Feb-99 PAGE: 1 OF 1
PROJECT: Pendleton (Frontier Chemical) Site Remediation DAY: Thursday
SUBJECT: On Site Supervisor's Report PROJECT TIME: 1:00 pm - 2:30 pm
CLIENT: Pendleton Site PRP Group SITE TIME: 1:15 pm - 2:15 pm
WEATHER: Cool, Overcast (35° F) PHOTOS: YES ☒ NO ☐

- On site per O'Brien & Gere notification to record lake water elevation coincidental with semi-annual groundwater sampling event.
- Record Quarry Lake water surface elevation via level survey. Lake is ice covered. The ice surface elevation is 578.12'. The free water surface elevation is 577.97'.
- The O'Brien & Gere sampling team is also on site for sample collection.
- Site accessibility is limited due to snow / ice on the access road.
- Observe general site conditions and no major problems are noted. The pump vault is not accessed.

PERSONNEL ON SITE / CONTACTED:

Peter Bogardus, Shawn O'Dell - O'B&G

DISTRIBUTION:

John Burns - PPRP

Jen Smith - O'B&G

Man-hours: 1.5

REPORTED BY:

Jesse E. Crossman, Project Manager

REVIEWED BY:

Mark W. Glynn, P.E.

DOC FILE: 99-01-9901