



8644 Buffalo Avenue  
Niagara Falls, NY 14304  
(716) 283-7645  
Fax: (716) 283-2858  
[www.afienvironmental.com](http://www.afienvironmental.com)

September 11, 2019

Mr. Eugene Melnyk  
Mr. Chad Staniszewski  
Division of Environmental Remediation  
New York State Department of Environmental Conservation  
270 Michigan Avenue  
Buffalo, New York 14203-2915

**RE: Summary of Off-Site IRM Activities**

**AFI Project No.: D15B-Liberty BCP**

Dear Gene and Chad:

AFI is writing this letter for the purpose of summarizing the IRM excavation activities at the Hurwitz Company Site, as a follow up to our discussion on September 4, 2019. During our last meeting on September 4, 2019, the department requested photos of the work areas and a short summary of the excavation totals and extent of the work performed.

**IRM Activities Summary:**

LIM proposed excavation activities of the off-site area adjacent to the eastern property line (EPL) and the southern property line (SPL) to remove and process fugitive materials, including buried solid waste (plastics, wood and metals), recoverable ferrous and non-ferrous metals, and impacted soils. Initial excavation, processing and disposal activities began October 1, 2018 and ceased in late December 2018, due to the changing season and inclement weather. Secondary excavation activities took place in isolated areas along the site property boundary in August 2019.

**EPL**

The IRM work areas were divided into representative zones for excavation and sampling. Twenty (20) confirmation soil samples were collected (**Figure 1**), summary maps are included as **Figures 2-4** and a data summary table is included as **Table 1**.

The area adjacent to the Eastern property line was divided up into 30' x 30' zones for excavation and sampling. The designated areas adjacent to the EPL were divided into 19 zones, from the south eastern boundary point to the non-ferrous warehouse. All 19 zones were excavated to grade and all of the soils and debris which migrated from the Site were removed. It should be noted that samples were collected from zones EPL-1 through EPL-15. Each individual zone is 30' long by 30' wide, which comprised an area of 900 ft<sup>2</sup> per zone. The total surface area of excavation that occurred along the EPL is 17,100 ft<sup>2</sup>. All fugitive waste including wood, plastics, as well as both ferrous and non-ferrous metals were removed from the above grade soils in each zone. The depth of excavation ranged from approximately 0.5 to 6 feet and was performed until no fugitive waste, municipal solid wastes or impacted soils were observed by AFI personnel. Impacted soils were excavated and stored until they were analyzed for waste disposal characteristics. Soils were then disposed of at the Waste Management Landfill in Chaffee New York under waste management

profile number 117817NY. Soils were transported by Mallare trucking enterprises under a non-hazardous waste manifest from the site to the Waste Management landfill.

### **SPL**

Twenty-nine (29) confirmation soil samples were collected; the work area and sample location can be seen in **Figure 1**. Soil data summary maps are included as **Figures 2-4** and a data summary table is included as **Table 2**.

The area adjacent to the Southern Property Line was divided up into 30' x 6' zones for excavation and sampling. The designated areas adjacent to the SPL were divided into 29 zones, spanning from the south western corner of the site to the railroad service entrance towards the south eastern corner of the property. It should be noted, only 21 of the 29 zones were sampled. Each individual zone is 30' long by 6' wide, providing an excavation area of 180 square feet per zone. The total surface area of excavation that occurred along the SPL is 4860 square feet. All fugitive waste including wood, plastics, as well as both ferrous and non-ferrous metals were removed from the above grade soils in each zone. The depth of excavation ranged from approximately 0.5 to 1.5 feet and was performed until no fugitive waste, municipal solid wastes or impacted soils were observed by AFI personnel. Impacted soils were excavated and stored until they were analyzed for waste disposal characteristics. Soils were then disposed of at the Waste Management Landfill in Chaffee New York under waste management profile number 117817NY. Soils were transported by Mallare trucking enterprises under a non-hazardous waste manifest from the site to the Waste Management landfill.

### **IRM Excavation Summary**

A total of approximately 1500 linear feet of the Site property boundary was addressed, removing soil and debris which had encroached from on the site to the area adjacent to the property line, off-site. In total, approximately 22,000 square feet of area was excavated and cleared of debris and solid waste. A total of 3900 tons of soils were sent to the Waste Management Chaffee Landfill for disposal during the IRM activities.

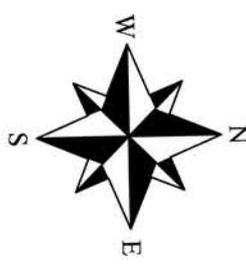
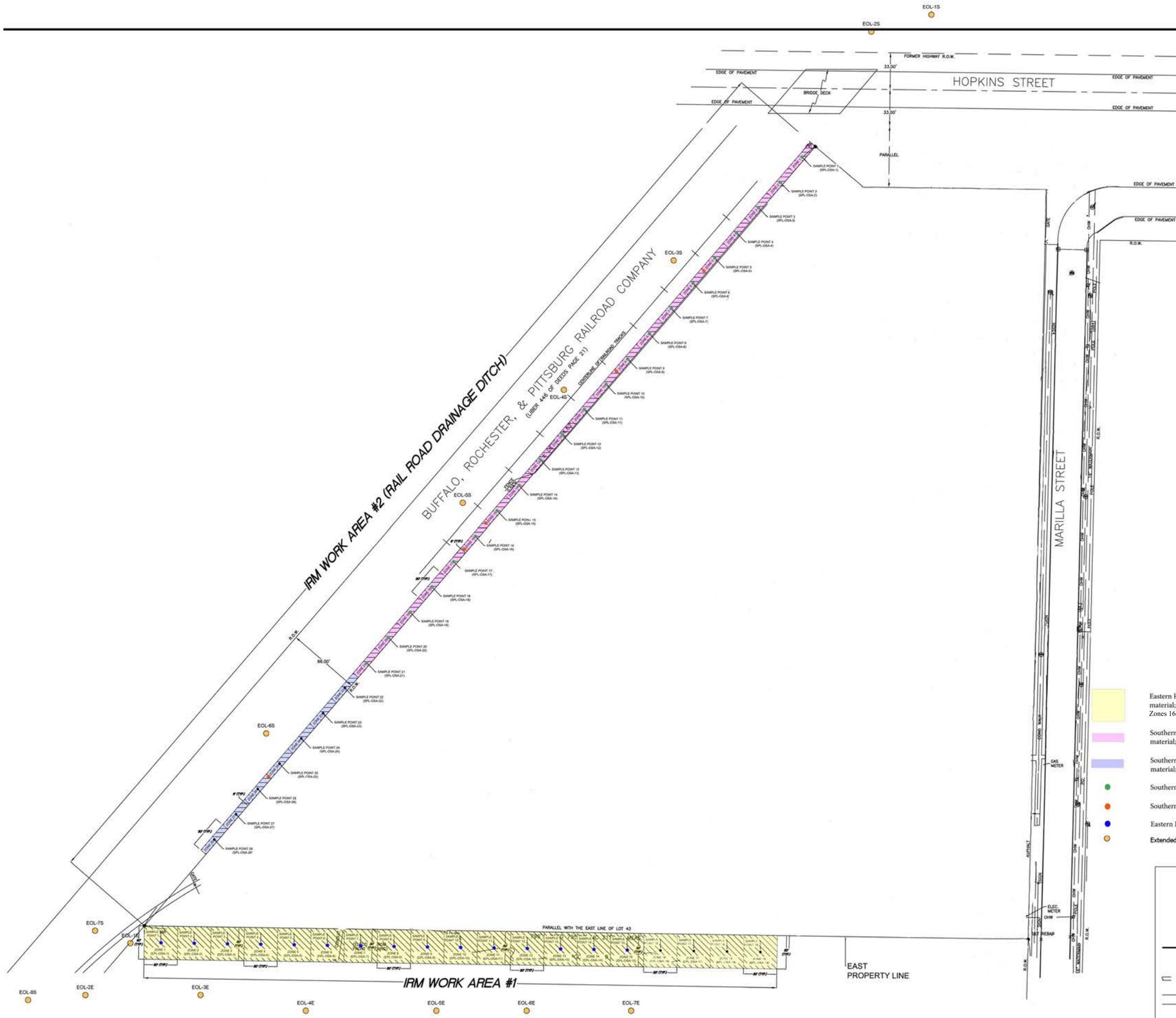
A photo log of the off-site work has been included with this letter as an attachment for your review. Please feel free to contact me at my cell phone, 415-238-2985, if you need any additional information or if you have any questions.

Sincerely,



Joshua Bartone  
AFI Environmental  
Project Manager/Senior Geologist

Cc: Mr. William Heitzenrater, Liberty Iron and Metal, Inc.  
Mr. Mike Diamond LIM  
Mrs. Deborah Chadsey ESQ, Kavinoky Cook



# IRM Sampling Map

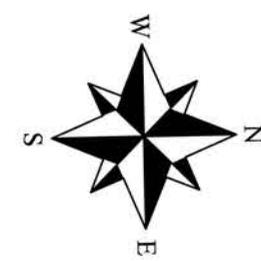
Hurwitz Company Site  
 NYSDEC BCP Site #915290  
 267 Marilla Street, Buffalo NY 14220



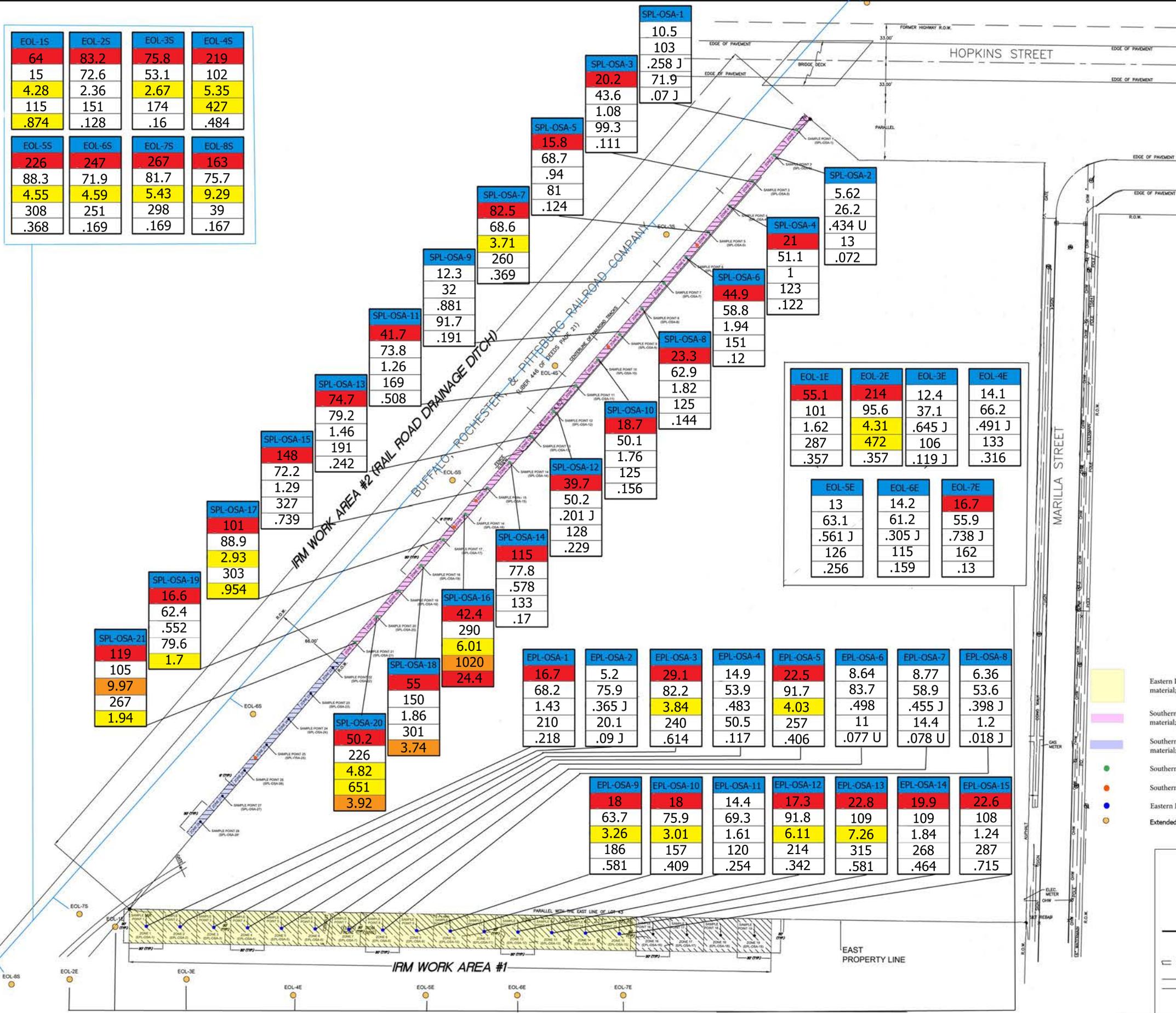
IRM Summary Letter  
 Figure 1

D15B-Liberty BCP

09/11/2019  
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EOL-1S	EOL-2S	EOL-3S	EOL-4S
64	83.2	75.8	219
15	72.6	53.1	102
4.28	2.36	2.67	5.35
115	151	174	427
.874	.128	.16	.484
EOL-5S	EOL-6S	EOL-7S	EOL-8S
226	247	267	163
88.3	71.9	81.7	75.7
4.55	4.59	5.43	9.29
308	251	298	39
.368	.169	.169	.167

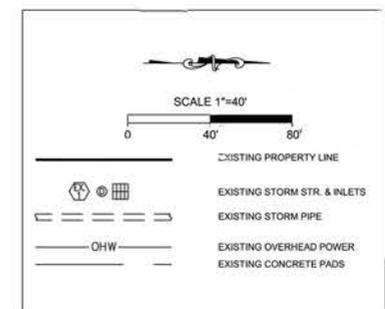


Sample ID	
Arsenic (mg/kg)	
Residential Use SCO	16 mg/kg
Commercial Use SCO	16 mg/kg
Industrial Use SCO	16 mg/kg
Barium (mg/kg)	
Residential Use SCO	350 mg/kg
Commercial Use SCO	400 mg/kg
Industrial Use SCO	10000 mg/kg
Cadmium (mg/kg)	
Residential Use SCO	2.5 mg/kg
Commercial Use SCO	9.3 mg/kg
Industrial Use SCO	60 mg/kg
Lead (mg/kg)	
Residential Use SCO	400 mg/kg
Commercial Use SCO	1000 mg/kg
Industrial Use SCO	3900 mg/kg
Mercury (mg/kg)	
Residential Use SCO	0.81 mg/kg
Commercial Use SCO	2.8 mg/kg
Industrial Use SCO	5.7 mg/kg

Exceeds Residential Use SCOs
Exceeds Commercial Use SCOs
Exceeds Industrial Use SCOs

\*ND = Non-Detect or Below Exceedance Level  
 \*NA = Data Not Available  
 \*J = Estimated value; result is less than the sample quantitation limit but greater than zero.  
 \*U = Not Detected at the reported detection limit for the sample  
 \*P = The RPD between the results for the two columns exceeds the method-specified criteria.

- Eastern Property Line Zones 1-15: Excavated to grade, clear of solid wastes and fugitive scrap material; Visually Inspected by AFI; Samples collected and field measured with PID Meter
- Southern Property Line Zones 1-21: Excavated to grade, clear of solid wastes and fugitive scrap material; Visually Inspected by AFI; Samples collected and field measured with PID Meter
- Southern Property Line Zones 22-29: Excavated to grade, clear of solid wastes and fugitive scrap material; Visually Inspected by AFI
- Southern Property Line Sample Point Locations
- Southern Property Line Test Pit Locations
- Eastern Property Line Sample Point Locations
- Extended Off-Site Sample Point Locations



# IRM Soil RCRA 8 Metals Exceedances Data Map

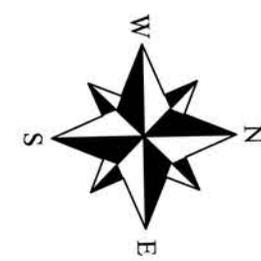
Hurwitz Company Site  
 NYSDEC BCP Site# 915290  
 267 Marilla Street, Buffalo, New York 14220



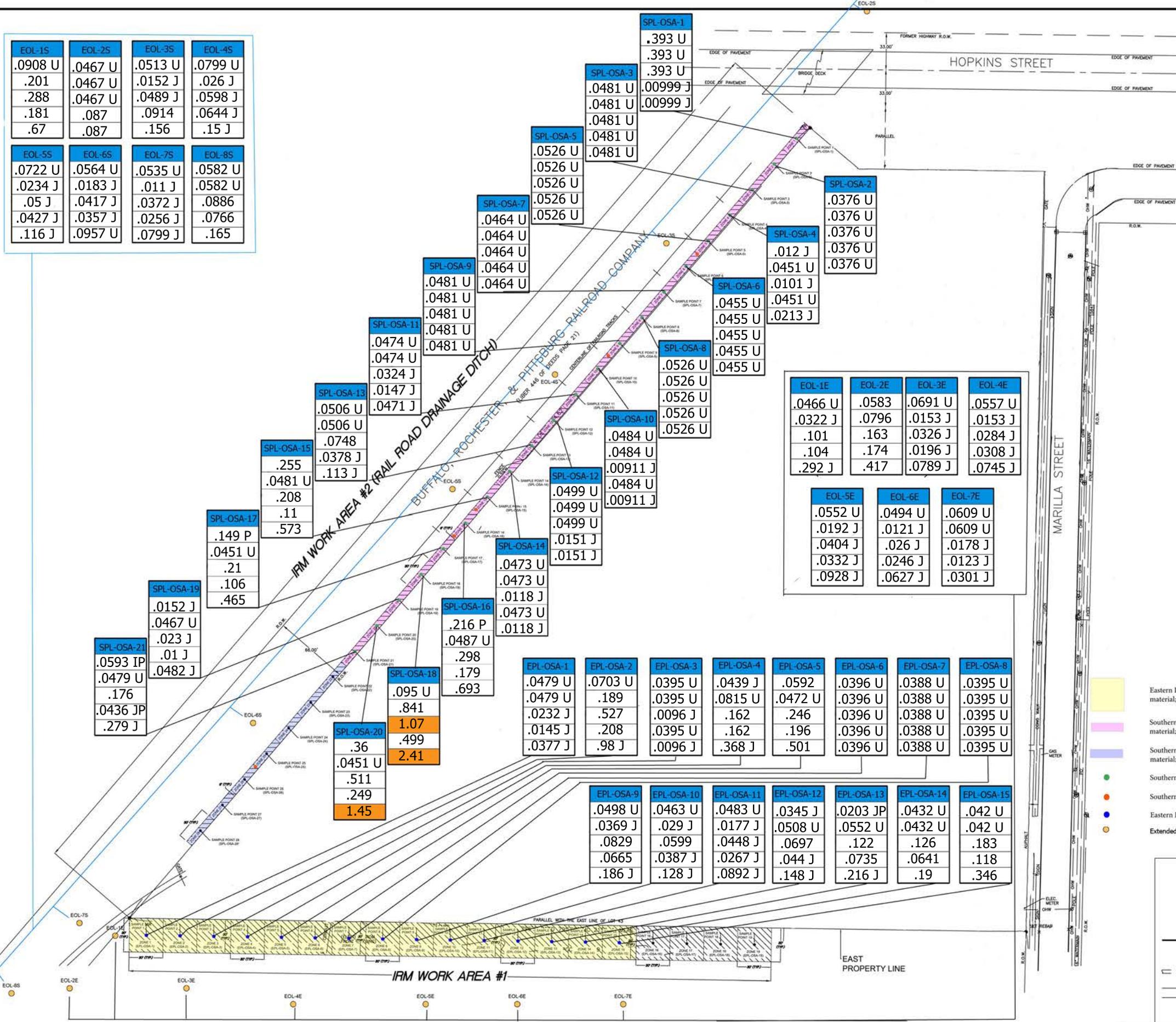
IRM Summary Figure  
 2

D15B-Liberty-BCP

09/04/2019  
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EOL-1S .0908 U .201 .288 .181 .67	EOL-2S .0467 U .0467 U .0467 U .087 .087	EOL-3S .0513 U .0152 J .0489 J .0914 .156	EOL-4S .0799 U .026 J .0598 J .0644 J .15 J
EOL-5S .0722 U .0234 J .05 J .0427 J .116 J	EOL-6S .0564 U .0183 J .0417 J .0357 J .0957 U	EOL-7S .0535 U .011 J .0372 J .0256 J .0799 J	EOL-8S .0582 U .0582 U .0886 .0766 .165



EOL-1E .0466 U .0322 J .101 .292 J	EOL-2E .0583 .0796 .163 .417	EOL-3E .0691 U .0153 J .0326 J .0196 J .0789 J	EOL-4E .0557 U .0153 J .0284 J .0308 J .0745 J
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EOL-5E .0552 U .0192 J .0404 J .0332 J .0928 J	EOL-6E .0494 U .0121 J .026 J .0246 J .0627 J	EOL-7E .0609 U .0609 U .0178 J .0123 J .0301 J
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EPL-OSA-1 .0479 U .0479 U .0232 J .0145 J .0377 J	EPL-OSA-2 .0703 U .189 .527 .208 .98 J	EPL-OSA-3 .0395 U .0395 U .0096 J .0096 J	EPL-OSA-4 .0439 J .0815 U .162 .162 .368 J	EPL-OSA-5 .0592 .0472 U .246 .196 .501	EPL-OSA-6 .0396 U .0396 U .0396 U .0396 U	EPL-OSA-7 .0388 U .0388 U .0388 U .0388 U	EPL-OSA-8 .0395 U .0395 U .0395 U .0395 U
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EPL-OSA-9 .0498 U .0369 J .0829 .0665 .186 J	EPL-OSA-10 .0463 U .029 J .0599 .0387 J .128 J	EPL-OSA-11 .0483 U .0177 J .0448 J .0267 J .0892 J	EPL-OSA-12 .0345 J .0508 U .0697 .044 J .148 J	EPL-OSA-13 .0203 JP .0552 U .122 .0735 .216 J	EPL-OSA-14 .0432 U .0432 U .126 .0641 .19	EPL-OSA-15 .042 U .042 U .183 .118 .346
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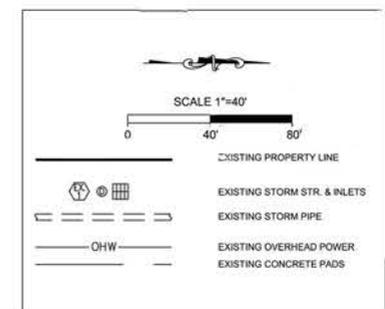
Sample ID
Aroclor 1242 (mg/kg) Residential Use SCO 1 mg/kg Commercial Use SCO 1 mg/kg
Aroclor 1248 (mg/kg) Residential Use SCO 1 mg/kg Commercial Use SCO 1 mg/kg
Aroclor 1254 (mg/kg) Residential Use SCO 1 mg/kg Commercial Use SCO 1 mg/kg
Aroclor 1260 (mg/kg) Residential Use SCO 1 mg/kg Commercial Use SCO 1 mg/kg
PCBs, Total (mg/kg) Residential Use SCO 1 mg/kg Commercial Use SCO 1 mg/kg

**Exceeds Residential Use SCO**

**Exceeds Commercial Use SCO**

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- Extended Off-Site Sample Point Locations



# IRM Soil PCBs Exceedances Data Map

Hurwitz Company Site  
 NYSDEC BCP Site# C915290  
 267 Marilla Street, Buffalo, New York 14220

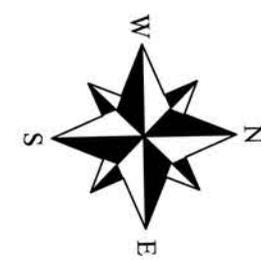


IRM Summary Figure

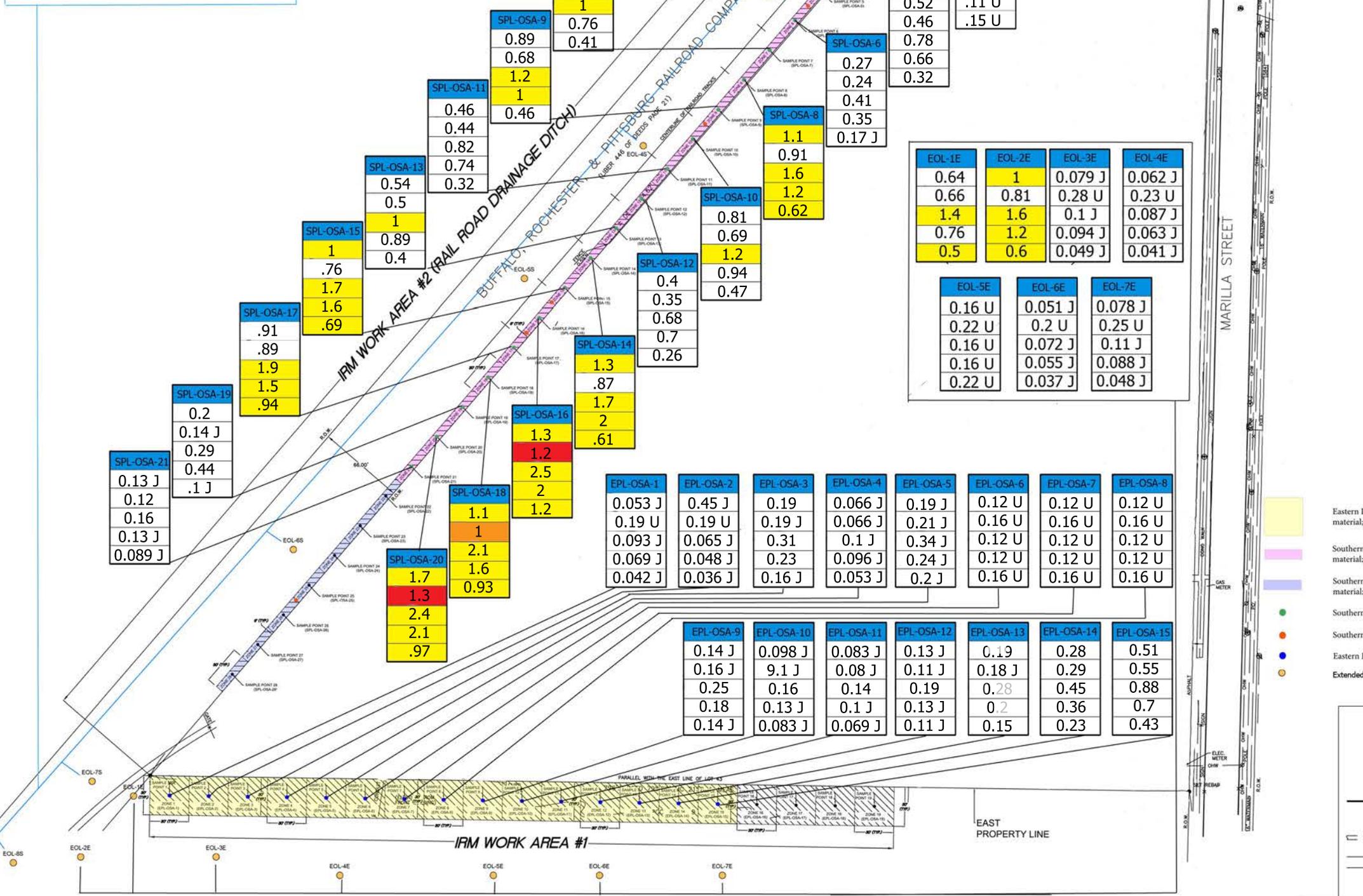
3

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09/04/2019  
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EOL-1S	EOL-2S	EOL-3S	EOL-4S
0.3	0.49	0.29	0.29
0.29 J	0.68	0.28	0.29 J
0.51	1.3	0.55	0.43
0.36	0.64	0.31	0.32
0.2 J	0.53	0.2	0.2J
EOL-5S	EOL-6S	EOL-7S	EOL-8S
0.18 J	.071	0.65	1.2
0.18 J	0.52	0.51	0.84
0.25	1	1.1	1.5
0.19	1	0.97	1.1
0.12 J	0.37	0.37	0.5

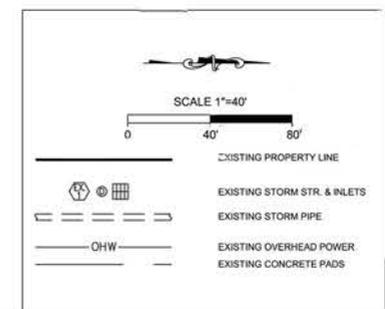


Sample ID	
Benzo(a)anthracene (mg/kg)	Residential Use SCO 1 mg/kg Commercial Use SCO 5.6 mg/kg Industrial Use SCO 11 mg/kg
Benzo(a)pyrene (mg/kg)	Residential Use SCO 1 mg/kg Commercial Use SCO 1 mg/kg Industrial Use SCO 1.1 mg/kg
Benzo(b)fluoranthene (mg/kg)	Residential Use SCO 1 mg/kg Commercial Use SCO 5.6 mg/kg Industrial Use SCO 11 mg/kg
Chrysene (mg/kg)	Residential Use SCO 1 mg/kg Commercial Use SCO 56 mg/kg Industrial Use SCO 110 mg/kg
Indeno(1,2,3-cd)pyrene (mg/kg)	Residential Use SCO 0.5 mg/kg Commercial Use SCO 5.6 mg/kg Industrial Use SCO 11 mg/kg

Exceeds Residential Use SCOs
Exceeds Commercial Use SCOs
Exceeds Industrial Use SCOs

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 \*NA = Data Not Available  
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# IRM Soil SVOCs Exceedances Data Map

Hurwitz Company Site  
 NYSDEC BCP Site# 915290  
 267 Marilla Street, Buffalo, New York 14220



IRM Summary Figure  
 4

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09/04/2019  
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**Table 1**  
**IRM Eastern Property Line Soil Analytical Data Summary Table**  
**Hurwitz Company Site**  
**267 Marilla Street**  
**Buffalo, New York 14220**  
**Site ID: C915290**

LOCATION	EPL-OSA-1	EPL-OSA-1-2	EPL-OSA-1-3	EPL-OSA-2	EPL-OSA-3	EPL-OSA-4	EPL-OSA-4-2	EPL-OSA-5	EPL-OSA-6	EPL-OSA-7	EPL-OSA-8	EPL-OSA-9	EPL-OSA-10	EPL-OSA-11	EPL-OSA-12	EPL-OSA-13	EPL-OSA-14	EPL-OSA-14-2	EPL-OSA-15	EPL-OSA-15-2																											
SAMPLING DATE	10/31/2018	12/10/2018	8/12/2019	10/31/2018	10/26/2018	10/26/2018	8/12/2019	10/26/2018	11/13/2018	11/13/2018	11/13/2018	11/9/2018	11/8/2018	11/8/2018	11/6/2018	11/6/2018	11/6/2018	8/12/2019	11/6/2018	8/12/2019																											
LAB SAMPLE ID	L1844753-01	L1850609-01	L1936079-09	L1844753-02	L1843892-01	L1843892-02	L1936079-10	L1843892-03	L1846515-01	L1846515-02	L1846515-03	L1846068-01	L1846069-02	L1846069-01	L1845317-04	L1845317-03	L1845317-02	L1936079-11	L1845317-01	L1936079-12																											
SAMPLE TYPE	SOIL	SOIL	SOIL																																												
SAMPLE DEPTH (ft.)	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5																											
CasNum	NY-RES1	NY-RES2	NY-RES3	NY-UNRES	Units	Results	Qual	Results	Qual	Results	Qual																																				
Solids, Total	NONE				%	68.9		46		68.9		68.3		55.1		39.4		39.4		68.1		81.9		81		83.4		63.1		70.4		68.2		63.3		60.2		42.4		73.7		38.8		38.8			
General Chemistry																																															
Polychlorinated Biphenyls																																															
Aroclor 1242	53469-21-9	25	1	1	0.1 mg/kg	0.0482	U	0.0703	U	0.0479	U	0.0487	U	0.0137	J	0.0439	J	0.0395	U	0.0592	U	0.0396	U	0.0388	U	0.0395	U	0.0498	U	0.0463	U	0.0483	U	0.0345	J	0.0203	JP	0.0524	J	0.0432	U	0.084	U	0.042	U		
Aroclor 1248	12672-29-6	25	1	1	0.1 mg/kg	0.0482	U	0.189	U	0.0479	U	0.0487	U	0.0584	U	0.0815	U	0.0395	U	0.0472	U	0.0396	U	0.0388	U	0.0395	U	0.0369	J	0.029	J	0.0177	J	0.0508	U	0.0552	U	0.0774	U	0.0432	U	0.0824	U	0.042	U		
Aroclor 1254	11097-69-1	25	1	1	0.1 mg/kg	0.0599	U	0.527	U	0.0232	J	0.324	U	0.0628	U	0.162	U	0.0395	J	0.246	U	0.0396	U	0.0388	U	0.0395	U	0.0829	U	0.0599	U	0.0448	J	0.0697	U	0.122	U	0.321	U	0.126	U	0.328	U	0.183	U		
Aroclor 1260	11096-82-5	25	1	1	0.1 mg/kg	0.0461	J	0.208	U	0.0145	J	0.211	U	0.0721	U	0.196	U	0.0395	U	0.0395	U	0.0388	U	0.0395	U	0.0665	U	0.0387	J	0.0267	J	0.044	J	0.0735	U	0.0641	U	0.2	U	0.118	U	0.2	U				
Aroclor 1268	11100-14-4	25	1	1	0.1 mg/kg	0.0298	J	0.056	J	0.0479	U	0.0487	U	0.0324	J	0.0815	U	0.0395	U	0.0472	U	0.0396	U	0.0388	U	0.0395	U	0.0498	U	0.0463	U	0.0483	U	0.0552	U	0.0774	U	0.0432	U	0.0824	U	0.045	U				
PCBs, Total	1336-36-3	25	1	1	0.1 mg/kg	0.136	J	0.98	J	0.0377	J	0.535	U	0.181	J	0.368	J	0.0395	J	0.501	U	0.0396	U	0.0388	U	0.0395	U	0.186	J	0.128	J	0.0892	J	0.148	J	0.216	J	0.525	J	0.19	U	0.612	U	0.346	U		
Semivolatile Organics																																															
Acenaphthene	83-32-9	1000	500	100	20 mg/kg	0.042	J	2.9	U	0.19	U	0.19	U	0.054	J	0.97	U	0.16	U	0.55	U	0.16	U	0.16	U	0.16	U	0.21	U	0.18	U	0.19	U	0.2	U	0.22	U	0.31	U	0.028	J	0.052	J	0.052	J		
2,4-Dimethylphenol	105-67-9				mg/kg	0.24	U	3.6	U	0.24	U	0.24	U	0.29	U	1.2	U	0.2	U	0.69	U	0.22	U	0.2	U	0.2	U	0.26	U	0.23	U	0.24	U	0.26	U	0.27	U	0.39	U	0.22	U	0.42	U	0.42	U		
2-Methylnaphthalene	91-57-6				mg/kg	0.66	U	1.8	J	0.047	J	0.029	J	0.29	J	0.2	J	0.12	J	0.82	U	0.026	J	0.24	U	0.2	J	0.097	J	0.11	J	0.096	J	0.24	J	0.11	J	0.096	J	0.24	J	0.14	J	0.14	J		
3-Methylphenol/4-Methylphenol	108-39-4	1000	500	34	0.33 mg/kg	0.041	J	5.2	U	0.34	U	0.35	U	0.18	J	1.7	U	0.28	U	0.99	U	0.29	U	0.29	U	0.28	U	0.05	J	0.33	U	0.14	J	0.37	U	0.39	U	0.56	U	0.32	U	0.6	U	0.6	U		
3-Nitroaniline	99-09-2				mg/kg	0.24	U	3.6	U	0.24	U	0.24	U	0.29	U	1.2	U	0.2	U	0.69	U	0.2	U	0.2	U	0.2	U	0.26	U	0.2	U	0.11	J	0.39	U	0.22	U	0.22	U	0.42	U	0.42	U				
Acenaphthylene	208-96-8	1000	500	100	100 mg/kg	0.32	U	0.89	J	0.19	U	0.19	U	0.054	J	0.97	U	0.16	U	0.55	U	0.16	U	0.16	U	0.16	U	0.041	J	0.18	U	0.19	U	0.045	J	0.042	J	0.068	J	0.065	J	0.24	J	0.24	J		
Acetophenone	98-86-2				mg/kg	0.24	U	3.6	U	0.24	U	0.24	U	0.29	U	1.2	U	0.2	U	0.69	U	0.2	U	0.2	U	0.2	U	0.19	J	0.18	U	0.24	U	0.04	J	0.27	U	0.062	J	0.22	U	0.42	U	0.42	U		
Anthracene	120-12-7	1000	500	100	100 mg/kg	0.32	U	0.95	J	0.14	U	0.14	U	0.066	J	1.73	U	0.12	U	0.41	U	0.12	U	0.12	U	0.12	U	0.07	J	0.14	U	0.14	U	0.15	U	0.16	U	0.23	U	0.083	J	0.19	J	0.19	J		
Benzaldehyde	100-52-7				mg/kg	0.32	U	1.95	J	0.32	U	0.32	U	0.25	J	1.6	U	0.063	J	0.91	U	0.27	U	0.26	U	0.26	U	0.34	U	0.12	J	0.14	J	0.34	U	0.36	U	0.46	J	0.16	J	0.19	J				
Benzo(a)anthracene	56-55-3	11	5.6	1	1 mg/kg	1.2	U	2.6	U	0.053	J	0.045	J	0.19	J	0.36	J	0.066	J	0.19	J	0.12	U	0.12	U	0.12	U	0.14	J	0.098	J	0.083	J	0.13	J	0.19	U	0.27	U	0.28	U	0.6	U				
Benzo(a)pyrene	50-32-8	1.1	1	1	1 mg/kg	1.2	U	3	U	0.19	U	0.19	U	0.19	J	0.38	J	0.066	J	0.21	J	0.16	U	0.16	U	0.16	U	0.16	J	0.1	J	0.08	J	0.11	J	0.18	J	0.27	J	0.29	U	0.63	U				
Benzo(b)fluoranthene	205-99-2	11	5.6	1	1 mg/kg	2.2	U	4.8	U	0.093	J	0.065	J	0.31	J	0.59	J	0.1	J	0.34	J	0.12	U	0.12	U	0.12	U	0.25	U	0.16	U	0.14	U	0.19	U	0.28	U	0.4	U	0.45	U	0.91	U				
Benzo(ghi)perylene	191-24-2	1000	500	100	100 mg/kg	0.77	U	2	J	0.039	J	0.032	J	0.15	J	0.29	J	0.054	J	0.2	J	0.16	U	0.16	U	0.16	U	0.072	J	0.052	J	0.14	J	0.098	J	0.068	J	0.098	J	0.14	J	0.21	J	0.22	U	0.46	U
Benzo(k)fluoranthene	207-08-9	110	56	1	0.8 mg/kg	0.62	U	1.5	J	0.038	J	0.14	U	0.086	J	0.73	U	0.12	U	0.41	U	0.12	U	0.12	U	0.12	U	0.072	J	0.052	J	0.14	U	0.06	J	0.089	J	0.14	J	0.16	U	0.32	U	0.32	U		
Biphenyl	92-52-4				mg/kg	0.11	J	8.2	U	0.55	U	0.55	U	0.67	U	2.8	U	0.45	U	1.6	U	0.46	U	0.46	U	0.45	U	0.59	U	0.53	U	0.54	U	0.58	U	0.62	U	0.89	U	0.51	U	0.96	U	0.96	U		
Bis(2-ethylhexyl)phthalate	117-81-7				mg/kg	0.097	J	3.6	U	0.24	U	0.24	U	0.29	U	1.2	U	0.2	U	0.69	U	0.2	U	0.2	U	0.2	U	0.26	U	0.23	U	0.24	U	0.26	U	0.27	U	0.15	J	0.22	U	0.42	U	0.42	U		
Butyl benzyl phthalate	85-69-7				mg/kg	0.24	U	3.6	U	0.24	U	0.24	U	0.29	U	1.2	U	0.2	U	0.69	U	0.2	U	0.2	U	0.2	U	0.26	U	0.23	U	0.24	U	0.26	U	0.27	J	0.12	J	0.22	U	0.24	J	0.24	J		
Carbazole	86-74-8				mg/kg	0.12	J	0.56	J	0.24	U	0.24	U	0.056	J	1.2	U	0.2	U	0.69	U	0.2	U	0.2	U	0.2	U	0.048	J	0.027	J	0.026	J	0.027	J	0.045	J	0.076	J	0.059	J	0.18	J	0.18	J		
Chrysene	218-01-9	110	56	1	1 mg/kg	1.5	U	3.3	U	0.069	J	0.048	J	0.23	J	0.41	J	0.096	J	0.24	J	0.12	U	0.12	U	0.12	U	0.18	U	0.13	J	0.1	J	0.13	J	0.2	J	0.3	J	0.36	J	0.75	J				
Dibenz(a,h)anthracene	53-70-3	1.1	0.56	0.33	0.33 mg/kg	0.23	U	0.56	J	0.14	U	0.14	U	0.039	J	0.73	U	0.12	U	0.41	U	0.12	U	0.12	U	0.12	U	0.16	U	0.14	U																

