

January 26, 2004 HA4797-03000

#### VIA REGULAR MAIL

Mr. Craig Poff
Bentley Communities, L.P.
1595 Paoli Pike, Suite 202
P.O. Box 1906
West Chester, Pennsylvania 19380-6167

Subject:

Summary Report of Findings of Additional Phase II Activities Completed in the Vicinity of the Former Settlement Pond Located on the Balderston Property (Tax Parcel No. 29-04-179), 224 Swinehart Road, West Brandywine Township, Chester County, Pennsylvania

Dear Mr. Poff:

Penn Environmental & Remediation, Inc. (Penn E&R) is pleased to present this summary report for the additional Phase II Site Assessment activities completed at the above-referenced site (Site) during December 2003. The purpose of the additional Phase II activities was to evaluate potential impacts to subsurface soil and ground water in the vicinity of the former settlement pond located in the southwest portion of the Site. Penn E&R understands that Bentley Communities, L.P. (Bentley) intends to construct a sewer treatment plant in the immediate vicinity of the former settlement pond. The methods and findings of the additional Phase II activities are presented below.

#### SITE LOCATION AND DESCRIPTION

The Site consists of a 130.2-acre irregular-shaped parcel of land located at the southeast corner of the intersection of Swinehart Road and Culbertson Run Road in West Brandywine Township, Chester County, Pennsylvania. The property is identified by the Chester County Tax Assessors Office as Parcel 29-04-0179. It consists of undeveloped agricultural land used primarily for cultivation of corn and soybeans. The only structure present on the Site is the ruins of a stone barn that reportedly burned down approximately 15 years ago. The Site is owned by the Balderston Family Limited Partnership and has been used for agricultural purposes since at least 1945. Figure 1 shows the location of the Site.

#### **BACKGROUND**

Previous investigations completed at the Site by Penn E&R includes a Phase I Environmental Site Assessment (ESA) and a limited Phase II Site Assessment. The findings of these investigations are summarized below.

#### Phase I Environmental Site Assessment

At the request of Bentley, Penn E&R completed a Phase I ESA on the Site during October 2002. The results of this Phase I ESA were documented in an October 22, 2002 report prepared by Penn E&R

Mr. Craig Poff January 26, 2004 Page 2

entitled "Phase I Environmental Site Assessment for Tax Parcel No. 29-04-0179, Located on Swinehart Road, West Brandywine Township, Chester, County, Pennsylvania." As outlined in the aforementioned report, Penn E&R recommended that Bentley complete soil borings and collect subsurface soil samples from the on-Site area formerly occupied by a settlement pond. As indicated above, the former settlement pond was located in the cornfield in the southwest portion of the Site. Treated wash water from a former automotive facility was reportedly hauled to the Site for approximately 5 years and disposed of in this settlement pond. Disposal activities ceased approximately 20 years ago when the results of PADER [(now Pennsylvania Department of Environmental Protection (PADEP)] monitoring indicated that not all the treated wash water had evaporated. Subsequently, the settlement pond was allowed to fill in and corn was planted over the pond.

#### Phase II Site Assessment

To address potential environmental issues associated with the disposal of treated wash water, Penn E&R implemented Phase II Site Assessment activities at the Site on November 14, 2002. The results of the Phase II activities are documented in the report entitled "Phase II Site Assessment Report of the Balderston Property (Tax Parcel No. 29-04-179) Located on Swinehart Road in West Brandywine Township, Chester County, Pennsylvania" and dated December 13, 2002. In the aforementioned Phase I report, Penn E&R recommended completing borings in the immediate vicinity of the former settlement pond. However, as the Balderston Family Partnership intended to retain this portion of the property for agricultural purposes, Bentley requested that the investigation of the former settlement pond area focus on evaluating surface soil conditions. As such, Penn E&R collected two surface soil samples [0 to 0.5 foot below ground surface (bgs)] in the immediate vicinity of the former settlement pond on November 14, 2002. The approximate locations of the two soil samples, designated SS-A-1 and SS-A-2, are shown on Figure 2. Following collection, the soil samples were submitted to GLA Laboratories, Inc. (GLA), a PADEP-certified laboratory located in King of Prussia, Pennsylvania and analyzed for volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), pesticides, and Resource Conservation and Recovery Act (RCRA) metals.

Table 1 summarizes laboratory analytical results for surface soil samples SS-A-1 and SS-A-2 that were collected from the former settlement pond. As shown on Table 1, no PAHs, PCBs, pesticides, or VOCs were detected above the listed laboratory detection limits. Low concentrations of arsenic, barium, chromium and lead were detected in the two surface soil samples obtained from the former settlement pond area. However, the reported concentrations of these constituents are well below their residential Medium Specific Concentration (MSC) cleanup standards developed pursuant to Pennsylvania's Land Recycling and Environmental Remediation Standards Act (Act 2).

#### ADDITIONAL PHASE II SITE ASSESSMENT ACTIVITIES

As indicated in the aforementioned Phase II Site Assessment Report, Penn E&R recommended that a limited boring and sampling program be implemented to evaluate subsurface soil and ground water quality conditions in the event development activities were implemented in the vicinity of the former settlement pond. As discussed above, Bentley intends to construct a sewer plant in the vicinity of the former settlement pond.

On December 3, 2003, Penn E&R implemented additional Phase II activities in the vicinity of the former settlement pond. Additional Phase II Site Assessment activities were implemented in accordance with our November 25, 2003 proposal entitled "Proposal to Implement a Limited Phase II Assessment in the Vicinity of the Former Settlement Pond on the Balderston Property Located at 224 Swinehart Road, West

Mr. Craig Poff January 26, 2004 Page 3

Brandywine Township, Chester County, Pennsylvania" and involved: (1) completing four soil borings within the approximate footprint of the former settlement pond; (2) collecting continuous subsurface soil samples from the four borings; and (3) submitting two of the subsurface soil samples for laboratory analysis of VOCs, PAHs, PCBs, pesticides, and RCRA metals.

The four soil borings, designated SS-A-3 through SS-A-6, were advanced to refusal using a hand-held direct push sampling device. During borehole advancement, soil samples were collected continuously from each boring. The Penn E&R on-Site geologist visually assessed the subsurface soil for lithologic information and indications of contamination (e.g., odors, stained/discolored soil horizons) and screened the soils in the field with a photo ionization detector (PID) to confirm the presence/absence of total volatile organic vapors.

#### RESULTS OF ADDITIONAL PHASE II SITE ASSESSMENT ACTIVITIES

This section of the report presents the results of additional Phase II Site Assessment sampling activities that were completed at the Site on December 3, 2003.

Table 2 presents the soil boring details. As shown on Table 2, subsurface materials encountered beneath a 1.5-foot-thick layer of topsoil consisted primarily of a silty loam and clay with trace amounts of fine gravel and coarse sand. Refusal, interpreted as bedrock, was encountered in the four borings at depths ranging from 3.5 feet below ground surface (BGS) to 6 feet BGS before intersecting the ground water table. As such, Penn E&R was unable to evaluate ground water conditions in the immediate vicinity of the former settlement pond. No odors or stained/discolored soil horizons were observed during borehole advancement. PID field screening results did not elicit a recorded reading above 0 parts per million.

Table 3 summarizes laboratory analytical results for the two subsurface soil samples (SS-A-3 and SS-A-5) collected from the former settlement pond. Laboratory analytical data and the chain-of-custody form for the aforementioned subsurface soil samples are included in Appendix A. As shown on Table 3, no PAHs, pesticides or VOCs were detected in the two soil samples at concentrations above the listed laboratory detection limits. Low concentrations of RCRA metals (arsenic, barium, chromium, and lead) were detected in the two subsurface soil samples collected from the footprint of the former settlement pond. However, the reported concentrations of these constituents are well below their Ac 2 residential MSC cleanup standards.

#### CONCLUSIONS AND RECOMMENDATIONS

During December 2003, Penn E&R completed additional Phase II Site Assessment activities in the vicinity of the former settlement pond. Additional Phase II Site Assessment activities included completing four soil borings and submitting two subsurface soil samples from the four borings completed within the footprint of the former settlement pond for laboratory analysis of VOCs, PAHs, PCBs, pesticides and RCRA metals. No PAHs, PCBs, pesticides or VOCs were detected at concentrations above the listed laboratory detection limits. Low concentrations of RCRA metals (arsenic, barium, chromium and lead) were detected in Site subsurface soils. However, none of the aforementioned metals were detected at concentrations that exceeded their Act 2 residential MSCs.

Based on these findings, no additional Site characterization or remedial action appears warranted in the vicinity of the former settlement pond.

Mr. Craig Poff January 26, 2004 Page 4

If you have any questions or comments pertaining to this report, or any project-related issues, or if we can be of further assistance, please contact us at your earliest convenience. We appreciate the opportunity to be of continued service to Bentley Communities, L.P.

Sincerely,

PENN ENVIRONMENTAL & REMEDIATION, INC.

Donald A. Coleman, P.G.

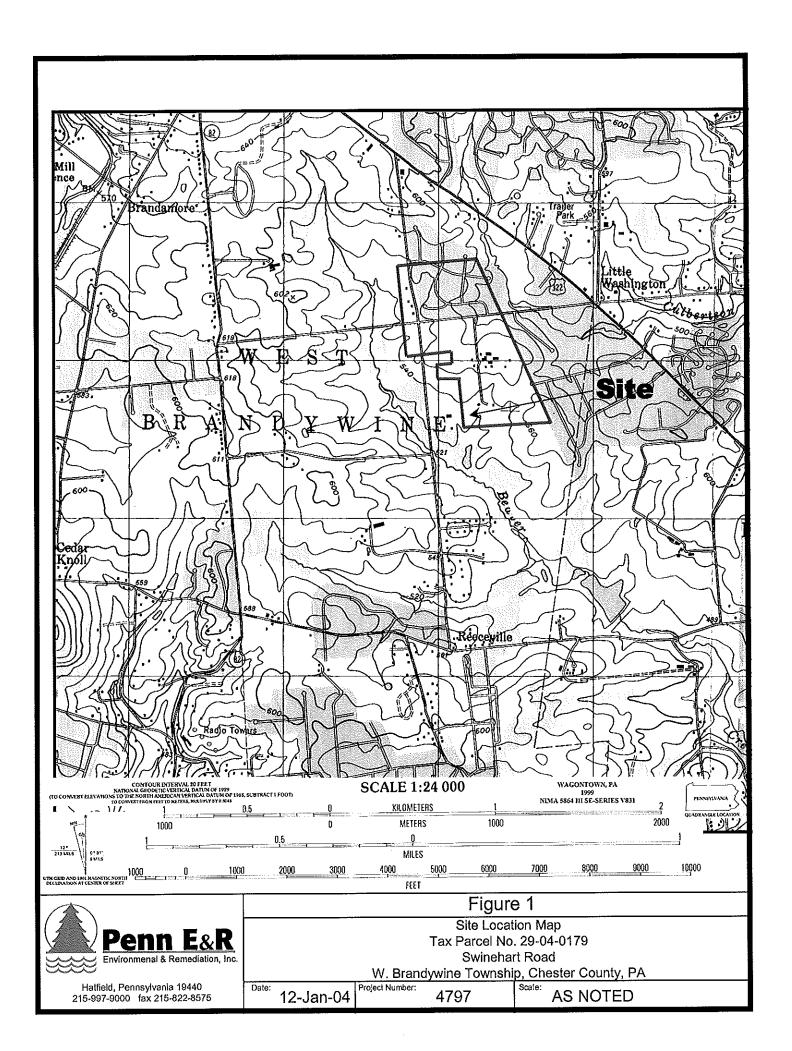
Don Coleman

Project Manager

Michael A. Christie, P.G.

Vice President

DAC:dac Enclosure 4797: rpt



## TABLE 1

# COLLECTED FROM THE FORMER SETTLEMENT POND AREA LOCATED ON THE BALDERSTON PROPERTY SUMMARY OF LABORATORY RESULTS FOR PHASE II ASSESSMENT SOIL SAMPLES SWINEHART ROAD, W. BRANDYWINE TOWNSHIP, CHESTER COUNTY, PA

	SAMPLE DESIGNATION	SAMPLE DESIGNATION/ANALYTICAL RESULTS <sup>(2)</sup>	PADEP	PADEP
ANAI VITICAL PARAMETERS <sup>(1)</sup>	SS-A-I	SS-A-2	MSC <sup>(3)</sup>	KSC <sup>(3)</sup>
ALCON TAXON TO THE PROPERTY OF				
Volatile Oreanic Compounds:	QN.	CIN		
PAHs:	QN	QN	-	-
PCBs:	QN	QN	1	-
Pesticides:	QN	QN	1	1
RCRA Metals:				
Arsenic	8>	9.3	12	150
Barium	83	120	15,000	8,200
Cadmium	<1	<1	47	38
Chromium	55	57	190,000	190,000
Lead	19	17	500	450
Mercury	<0.1	<0.1	99	10
Selenium	<12	<12	1,100	26
Silver	<2.5	<2.5	1,100	\$
Sample Collection Depth (4):	0-0.5	0-0.5		İ

### Notes: (1)-

Each sample was analyzed for VOCs, PAHs, PCBs and RCRA metals. Only those compounds detected above laboratory

detection limits are listed.

All results are reported in milligrams per kilogram.

(2) 3

Environmental Remediation Standards Act, Residential Medium Specific Concentrations (November 24, 2001). Pennsylvania Department of Environmental Protection, Land Recycling and

Sample collection depths are in feet below the ground surface

Medium Specific Concentration MSC-

Not Detected NO.

PADEP - Pennsylvania Department of Environmental Protection

Residential Direct Contact RDC-

Residential Soil-to-Ground Water RSG -

Compound was not detected above the listed laboratory detection limit

## TABLE 2 SUMMARY OF SOIL BORING INSTALLATION ACTIVITIES FORMER SETTLEMENT POND AREA BALDERSTON PROPERTY 224 SWINEHART ROAD, WEST BRANDYWINE TOWNSHIP CHESTER COUNTY, PENNSYLVANIA DECEMBER 3, 2003

SOIL BORING DESIGNATION	SAMPLE COLLECTION DEPTH (ft bgs)	PID (ppm)	DESCRIPTION / COMMENTS
SS-A-3	0-2	0	0-1.5' (Topsoil)
	2-4	0	1.5-6' Loamy Silt/Loamy Clay; trace fine Gravel and coarse Sand.
	4-6	0	Refual encountered on silicate bedrock at 6 feet BGS.
SS-A-4	0-2	0	0-1.5' (Topsoil) 1.5-3.5' Light brown Silt, loamy Clay; trace fine Gravel and coarse
	2-3.5	0	Sand; slight mottling. Refusal at approximately 3.5 feet BGS.
SS-A-5	0-2	0	0-1.5' (Top soil)
55115	2-4	0	1.5-6' Light brown Silt loam and clay; trace of fine grvel and coarse
	4-6	0	Sand. Slightly mottled. Refusal on silicate bedrock at 6 feet BGS.
SS-A-6	0-2	0	0-1.5' (Topsoil)
	2-4	0	1.5-6' Loamy Silt/Loamy Clay; trace fine Gravel and coarse Sand.
	4-6	0	Refual encountered on silicate bedrock at 6 feet BGS.

### TABLE 3

## COLLECTED FROM THE FORMER SETTLEMENT POND AREA LOCATED ON THE BALDERSTON PROPERTY SUMMARY OF LABORATORY RESULTS FOR SUBSURFACE SOIL SAMPLES SWINEHART ROAD, W. BRANDYWINE TOWNSHIP, CHESTER COUNTY, PA

	SAMPLE DESIGNATION/ANALYICAL RESULTS <sup>(3)</sup>	ANALYICAL RESULTS <sup>(2)</sup>	PADEP	PADEP
ANALYTICAL PARAMETERS <sup>(1)</sup>	SS-A-3	SS-A-5	RDC MSC <sup>(3)</sup>	RSG MSC <sup>(3)</sup>
Volatile Organic Compounds:	QN	QN	-	
PAHs:	ND	ND	1	1
PCBs:	QN	QN	ı	-
Pesticides:	CIN	QN	-	1
RCRA Metals:				
Arsenic	<b>8&gt;</b>	8.4	12	150
Barium	81	93	15,000	8,200
Cadmium	<1	<1	47	38
Chromium	50	53	190,000	190,000
Lead	21	22	005	450
Mercury	<0.1	<0.1	99	10
Selenium	<12	<12	1 100	26
Silver	<2.5	<2.5	1,100	84
Sample Collection Depth (4):	5.5-6	5.5-6	-	l

## Notes:

Each sample was analyzed for VOCs, PAHs, PCBs and RCRA metals. Only those compounds detected above laboratory

detection limits are listed.

All results are reported in milligrams per kilogram.

<u>6</u> 3

Pennsylvania Department of Environmental Protection, Land Recycling and

Environmental Remediation Standards Act, Residential Medium Specific Concentrations (November 24, 2001).

Sample collection depths are in feet below the ground surface

Medium Specific Concentration MSC-

Not Detected ÷

Pennsylvania Department of Environmental Protection PADEP - 1

Residential Direct Contact

Residential Soil-to-Ground Water

Compound was not detected above the listed laboratory detection limit RDC-RSG-



## Balderston Family Partnership Property





## APPENDIX A LABORATORY ANALYICAL DATA



(610) 337-9992 • FAX (610) 337-9939 (732) 661-0777 • FAX (732) 661-0305

12 December 2003

PENN E & R Don Coleman 2755 Bergey Rd Hatfield, PA 19440

RE: Balderston / W. Brandywine

Enclosed are the results of analyses for samples received by the laboratory on 12/03/03 14:25. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Jill Miller

Project Manager



(610) 337-9992 • FAX (610) 337-9939 (732) 661-0777 • FAX (732) 661-0305

PENN E & R 2755 Bergey Rd Hatfield PA, 19440 Project: Balderston / W. Brandywine

Project Number: [none]

Project Manager: Don Coleman

Reported:

12/12/03 18:10

#### ANALYTICAL REPORT FOR SAMPLES

Sample ID		Laboratory ID	Matrix	Date Sampled	Date Received	
SS-A-3	٠. ١	K312093-01	Soil	12/03/03 13:15	12/03/03 14:25	
SS-A-5		K312093-02	Soil	12/03/03 13:45	12/03/03 14:25	

GLA Laboratories

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.



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PENN E & R 2755 Bergey Rd Hatfield PA, 19440 Project: Balderston / W. Brandywine

Project Number: [none]

Project Manager: Don Coleman

Reported: 12/12/03 18:10

#### Total Metals by EPA 6000/7000 Series Methods

#### **GLA** Laboratories

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SS-A-3 (K312093-01) Soil	Sampled: 12/03/03 13:15	Received: 12	2/03/03 14:	25					
Mercury	ND	0.100	mg/kg dry	1	3120508	12/05/03	12/05/03	EPA 7471A	
Arsenic	ND	8.0	n	н	3120507	12/05/03	12/05/03	EPA 6010B	
Barium	81	0.50	•11	Ħ	11	н	11	11	
Cadmium	ND	1.0	п	19	11	11	It	18	
Chromium	50	2.5	1(	- 11	19	17	**	l#	
Lead	21	5.0	н	и	<b>?1</b>	11	*1	n	
Selenium	ND	12	ŧI	н	11	н	11	*1	
Silver	ND	2.5	, 11	11	* # at 1	1	11	11	
SS-A-5 (K312093-02) Soil	Sampled: 12/03/03 13:45	Received: 1	2/03/03 14:	:25		· · ·			
Mercury	ND	0.100	mg/kg dry	1	3120508	12/05/03	12/05/03	EPA 7471A	
Arsenic	8.4	8.0	11	**	3120507	12/05/03	12/05/03	EPA 6010B	
Barium	93	0.50	н	11		11	. 11	II.	
Cadmium	ND	1.0	19	Ħ	Ħ	11	· n	н	
Chromium	53	2.5	ŧI	Ħ	9 F	н	11	11	
Lead	22	5.0	11	. #	11	41 ·	tt	1t	
Selenium	ND	12	11	11	. 8	11	**	н	
Silver	ND	2.5	п	п	*11	11	11	11	

GLA Laboratories

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.



(610) 337-9992 • FAX (610) 337-9939

(732) 661-0777 • FAX (732) 661-0305

PENN E & R

Project: Balderston / W. Brandywine

2755 Bergey Rd Hatfield PA, 19440 ·

Project Number: [none] Project Manager: Don Coleman

Reported: 12/12/03 18:10

#### Organochlorine Pesticides by EPA Method 8081A

#### **GLA** Laboratories

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SS-A-3 (K312093-01) Soil	Sampled: 12/03/03 13:15	Received: 12	2/03/03 14:	25					Pa
Aldrin	ND	1.0	ug/kg dry	1	3120918	12/11/03	12/12/03	EPA 8081A	
alpha-BHC	ND	2.0	11	18	#	11	r	11	
beta-BHC	ND	1.0	11	79	11	11	re .	11	
delta-BHC	ND	1.0	11	11	11	11	76	11	
gamma-BHC (Lindane)	ND	1.0	11	_ #	11	11	n	ĮI.	G4
Chlordane (tech)	ND	20	11	11	11	<b>11</b> (1) (1)	· n ·-	· · · · · · · ·	
alpha-Chlordane	ND	2.0	11	11	п	Ħ	<b>61</b>	ti	
gamma-Chlordane	ND	2.0	, tr	#+	#f	ff .	. 11	r	
4,4′-DDD :	ND	6.0	11	17	\$I	3 N	*1	Ħ	
4,4'-DDE	ND	2.0	11	11	11	11	+1	n	
4,4'-DDT	ND	6.0	n	11	11	18	19	H	G4
Dieldrin	ND	2.0	11	11	и.,	11	ti	u	G4
Endosulfan I	· ND ·	2.0	<b>11</b> ·	n	tr.	11	n	н	
Endosulfan II	ND	2.0	**	17	41	11	**	"	
Endosulfan sulfate	ND	6.0	Ħ	11	н	)tr		11	
Endrin	ND	2.0	<b>1</b> 1	. 11	11	n .	tt .	rt	G4
Endrin aldehyde	ND	6.0	11	**	n :	1)	•	10	
Endrin ketone	ND .	6.0	**	**	11	11		11	
Heptachlor	ND	1.0	H	19	11	11	ur .	*	•
Heptachlor epoxide	NĎ	1.0	U	**	11	11	n	u	
Methoxychlor	ND	20	n	77	11	11	II.	17	
Toxaphene	ND	80	**	tı	11	11	**	tt	
Surrogate: Tetrachloro-meta	ı-xylene	62.4 %	60-1	26	n	n	и ,	ff	
Surrogate: Decachlorobiphe	enyl	48.1 %	60-1	26	n	rr .	"	"	O4

**GLA Laboratories** 

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PENN E & R 2755 Bergey Rd Hatfield PA, 19440 Project: Balderston / W. Brandywine

Project Number: [none]

Project Manager: Don Coleman

Reported: 12/12/03 18:10

#### Organochlorine Pesticides by EPA Method 8081A

#### **GLA** Laboratories

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SS-A-5 (K312093-02) Soil	Sampled: 12/03/03 13:45	Received: 12	2/03/03 14	:25					Pa
Aldrin	ND	1.0	ug/kg dry	1	3120918	12/11/03	12/12/03	EPA 8081A	
alpha-BHC	ND	2.0	Ð	п	ŧ	11	И	19	
beta-BHC	ND	1.0	ŧr	**	**	11	n •	*1	
delta-BHC	ND	1.0	11	n	10	19	110	11	
gamma-BHC (Lindane)	ND	1.0	19	. н	н	11	1t	10	G4
Chlordane (tech)	ND	20		11	11	11	н	#	•
alpha-Chlordane	ND	2.0	11	11	19	19	1r	11	
gamma-Chlordane	ND	2.0	. 11	н	#	11	11	10	
4,4'-DDD :	ND	6.0	н	n	<b>31</b>	1 10	н	n	
4,4'-DDE	ND	2.0	+1	19	10	н	ır	11	
4,4'-DDT	ND	6.0	11	11	n	11	19	tt	G4
Dieldrin	ND	2.0	U	н	Ħ	11	Ħ	et	G4
Endosulfan I	ND	2.0	11 .	**	TF	н	11	at .	
Endosulfan II	ND	2.0	It	)1	•)	11	19	H	
Endosulfan sulfate	ND	6.0	19	It	41	11	n	n	
Endrin	ND	2.0	ŧt	, "	17	n.	*1	41	G <sup>4</sup>
Endrin aldehyde	ND	6.0	tı	19	n	11	19	11	
Endrin ketone	ND	6.0	11	и	**	11	n	•	
Heptachlor	ND	1.0	n	н	11	10	ti	,,	
Heptachlor epoxide	ND	1.0	ŧŧ	u u	н	н	*1	य	
Methoxychlor	ND	20	11	м	**	11	11	II .	
Toxaphene	ND	. 80	17	н	n	17	u	11	
Surrogate: Tetrachloro-met		72.6 %	60-	126	n	n	n'	"	
Surrogate: Decachlorobiphe		52.5 %		126	"	п	#	n	0

GLA Laboratories

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PENN E & R

2755 Bergey Rd

Hatfield PA, 19440

1008 W. Ninth Avenue • King of Prussia, PA 19406 1090 King Georges Post Road • Suite 803 • Edison, NJ 08837 (610) 337-9992 • FAX (610) 337-9939 (732) 661-0777 • FAX (732) 661-0305

Project: Balderston / W. Brandywine

Project Number: [none]

Project Manager: Don Coleman

Reported: 12/12/03 18:10

#### Polychlorinated Biphenyls by EPA Method 8082

#### **GLA Laboratories**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SS-A-3 (K312093-01) Soil	Sampled: 12/03/03 13:15	Received: 12	2/03/03 14:	25					
PCB-1016	ND	50	ug/kg dry	1	3120517	12/09/03	12/09/03	EPA 8082	
PCB-1221	ND	50	11	79	11	H.	10	"	
PCB-1232	ND	50	Ħ	11	4r	10	**	et	
PCB-1242	ND	50	Ħ	11	н	Ħ	D	11	
PCB-1248	ND	50	n	, it	0	11	17	17	
PCB-1254	ND N	50	$\mathcal{F}_{i} = \mathbf{H}_{i} = \mathcal{F}_{i}$			n	· · II	n	
PCB-1260	ND	50	11	79	at.	it	н	H	
Surrogate: Tetrachloro-meto	r-xvlene	57.8 %	60	126	11	, "	n	n	04
Surrogate: Decachlorobiphe		49.8 %	60-	126	"	"	• "	tt.	04
SS-A-5 (K312093-02) Soil	Sampled: 12/03/03 13:45	Received: 12	2/03/03 14	:25					
PCB-1016	ND	50	ug/kg dry	1	3120517	12/09/03	12/09/03	EPA 8082	
PCB-1221	ND	50	10	ij	19	u u	ti	**	
PCB-1232	ND	50	*1	N	19	u	11	11	
PCB-1242	ND	50	н	. #	*1	11	11	1f	•
PCB-1248	ND	50	II .	п	**	1t .	1ŧ	10	
PCB-1254	ND	50	п	**	11	11	ti	Ħ	
PCB-1260	ND -	50	"	р	ji .		n	•r	
Surrogate: Tetrachloro-mete	a-xylene	66.9 %	60-	126	n	n	#	н	
Surrogate: Decachlorobiphe	= -	46.8 %	60-	126	"	"	"	"	04

**GLA** Laboratories

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PENN E & R 2755 Bergey Rd Hatfield PA, 19440 Project: Balderston / W. Brandywine

Project Number: [none]
Project Manager: Don Coleman

Reported: 12/12/03 18:10

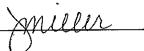
#### Volatile Organic Compounds by EPA Method 8260B

#### **GLA** Laboratories

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SS-A-3 (K312093-01) Soil	Sampled: 12/03/03 13:15	Received: 12	2/03/03 14:	25	<u> </u>				
Acetone	ND	120	ug/kg dry	1	3120516	12/05/03	12/05/03	EPA 8260B	O8
Benzene	ND	0.80	n	11	11	tt	II	**	
Bromodichloromethane	ND	0.80	n .	11	Ħ	16	IT	*1	
Bromoform	ND	1.6	11	FI	\$1	n	1(	11	
Bromomethane	ND	1.6	II	_ #	11	*1	IF	11	
2-Butanone	ND	80	11	**	ar	11	H	10	
Carbon disulfide	ND	1.6	n	11	17	11	11	11	
Carbon tetrachloride	ND	1.6	, 11	п		H .	· n	н	•
Chlorobenzene	ND	1.6	11	u	11	1 11	11	11	. :
Chlorodibromomethane	ND	1.6	11	**	47	17	tt.	at .	:
Chloroethane	ND	3.2	н	11	tt	11	**	u ·	
Chloroform	ND	1.6	n	11	H .		11	#1	
Chloromethane	ND	1.6	11	n	2000	5.0	II	11	
1,1-Dichloroethane	ND	1.6	11	rt	11	11	Iŧ	11	
1,2-Dichloroethane	. ND	1.6	17	**	11	11	tt.	n '	
1,1-Dichloroethene	ND	1.6	n	′ н	n	ıı .	+1	**	
cis-1,2-Dichloroethene	ND	1.6	**	n	11	н .	n	11	
trans-1,2-Dichloroethene	ND	1.6	11	н	41 '	11	11	41	
1,2-Dichloropropane	ND	1.6	11	**	11	*11	11	m	
cis-1,3-Dichloropropene	ND	1.6	11	**	* 1f	1[	19	ħ	1.4
trans-1,3-Dichloropropene	ND	1.6	T!	н	н	n	Ħ	11	
Ethylbenzene	ND	1.6	*1	П	*1	H	+1	R	
2-Hexanone	ND	8.0	+1	11	11	tı	11 •	19	
Methylene chloride	ND	24	11	ır	40	11	п	19	
4-Methyl-2-pentanone	ND.	8.0	11	R	п	11	. n	н	
Methyl tert-butyl ether	ND	1.6	17	**	. "	11	Ħ	n	
Styrene Styrene	ND	1.6	н	11	79		,	ar .	
1,1,2,2-Tetrachloroethane	ND	1.6	n ·	п	. 41	*11	ń	q	-
Tetrachloroethene	ND	0.80	11	п	17	11	11	н	
Toluene	ND	1.6	11	**	**	11	п	n	
1,1,1-Trichloroethane	ND	1.6	19	11		1.0			•
1,1,2-Trichloroethane	ND ND	. 1.6	ŧī	Ħ	'n	n .	. 11	11	
Trichloroethene	ND ND	0.80	11	н	11	11	н	n	
Trichlorofluoromethane	ND ND	1.6	11	**	н	11	tt	•	
	ND ND	1.6		Ħ	**	u .	**	11	
Vinyl chloride				17	<b>11</b>	n	1)	19	
p,m-Xylene	ND	3.2		 H	. 11	n e	if	· • • •	
o-Xylene	ND	1.6		17		11	It	11	
Xylenes (total)	ND	4.8					<i>"</i>		·-···
Surrogate: Dibromofluorome		101 %		140	n	<i>u</i> .			
Surrogate: 1,2-Dichloroethan	se-d4	106 %			"	п	n 	#	
Surrogate: Toluene-d8		98.6 %	60-	140	"	"	"	"	

GLA Laboratories

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.





PENN E & R

2755 Bergey Rd

Hatfield PA, 19440

1008 W. Ninth Avenue • King of Prussia, PA 19406 1090 King Georges Post Road • Suite 803 • Edison, NJ 08837 (610) 337-9992 • FAX (610) 337-9939 (732) 661-0777 • FAX (732) 661-0305

Project: Balderston / W. Brandywine

Project Number: [none]

Project Manager: Don Coleman

Reported:

12/12/03 18:10

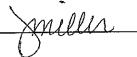
#### Volatile Organic Compounds by EPA Method 8260B

#### **GLA Laboratories**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SS-A-5 (K312093-02) Soil	Sampled: 12/03/03 13:45	Received: 12	2/03/03 14	:25					
Acetone	ND	120	ug/kg dry	1	3120516	12/05/03	12/05/03	EPA 8260B	08
Benzene	ND	0.77	11	Ħ	н	16	11	11	
Bromodichloromethane	ND	0.77	lf .	+1	11	41		17 41	
Bromoform	ND	1.5	n	11	19	11		11	•
Bromomethane	ND	1.5	11	_ #	Ħ	Ħ	. 11		
2-Butanone	ND	- 77	11	**	11	**	11	H	
Carbon disulfide	ND	1.5		n	11	41	IP		
Carbon tetrachloride	ND	1.5	. 11	n		n -	11	- • •	•
Chlorobenzene	ND	1.5	11	**	ni .	. 11	tr.	H	
Chlorodibromomethane	ND	. 1.5	rŧ	н	11	11	π	11	
Chloroethane	ND	3.1	Ħ		11	19	*1	- 11	
Chloroform	ND	1.5	11	rt	** 11 ** **		' 1f '	· n	
Chloromethane	ND	1.5	н .	11	11	and the second	. <b>"</b>	<del>(</del> )	
1,1-Dichloroethane	ND	1.5	19	п	Ħ	P	n	11	
1,2-Dichloroethane	ND	1.5	11	H	. 17		н		
1,1-Dichloroethene	ND	1.5	11	. 11	18	11 .	. "	"	:
cis-1,2-Dichloroethene	ND	1.5	10	n	· n · .	11	, tt	111	٠.
trans-1,2-Dichloroethene	ND.	1.5	ii .	tr		n	. +1	16	
1,2-Dichloropropane	ND	1.5	n	17	-11	*1	11	. 19	
cis-1,3-Dichloropropene	ND	1.5	11	11	11	¥F .	IF	*1	
trans-1,3-Dichloropropene	ND	1.5	n	ır		11	e	11	
Ethylbenzene	ND	1.5	11	14	46	*1	. н	It	
2-Hexanone	ND	7.7	11	**	19	11	1f >	ŧı	•
Methylene chloride	ND	23	n	н		0		11	
4-Methyl-2-pentanone	ND.	7.7	**	Ħ	11	<b>\$1</b>	11	Iŧ	
Methyl tert-butyl ether	ND	1.5		ń	н	16	n	11	
Styrene	ND	1.5		n	. 16	· • • •	H	11	
1,1,2,2-Tetrachloroethane	ND	1.5		tt	19	11	11	н	
Tetrachloroethene	ND	0.77		11		. 19	n	4f	
Toluene	ND	1.5		11	at a	n	. 11	u.	
1,1,1-Trichloroethane	ND	1.5		If		. 11	11	**	-
1,1,2-Trichloroethane	ND	1.5		н	91	11		11	
Trichloroethene	ND	0.77		n	11	*1	11	Ħ	
Trichlorofluoromethane	ND.	1.5		**	н.,	16		11	
Vinyl chloride	ND ND	1.5		н	11	11	•	Ħ	
•	ND	3.1		п	11	11	• 11	rı	•
p,m-Xylene	ND	1.5		u	Ħ	. 11	Ut.	11	•
o-Xylene	ND ND	4.6		17	11		n	v	
Xylenes (total)	<del> </del>			140	"	"	,,	"	
Surrogate: Dibromofluorom		102 %		)-140	,,	,, 11	n n	"	
Surrogate: 1,2-Dichloroetha	ne-d4	104 %		7-140	. "	,,	n	"	
Surrogate: Toluene-d8		98.7 %	6 60	7-140	н	72			

GLA Laboratories

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(610) 337-9992 • FAX (610) 337-9939 (732) 661-0777 • FAX (732) 661-0305

PENN E & R 2755 Bergey Rd Hatfield PA, 19440 Project: Balderston / W. Brandywine

Project Number: [none]

Project Manager: Don Coleman

Reported: 12/12/03 18:10

#### Semivolatile Organic Compounds by EPA Method 8270C

#### **GLA Laboratories**

Analyte	Result	Reporting Limit	Units D	ilution	Batch	Prepared	Analyzed	Method	Notes
SS-A-3 (K312093-01) Soil	Sampled: 12/03/03 13:15	Received: 12	/03/03 14:25						
Acenaphthene	ND	100	ug/kg dry	1	3120427	12/08/03	12/09/03	EPA 8270C	
Acenaphthylene	ND	100	11	11	16	11	**	" #1	
Anthracene	ND	100	11	H	11			"	
Benzo (a) anthracene	ND.	100	#1	"	+1	*1	. 11	"	
Benzo[a]pyrene	ND	100	11	- 11	11	п	. 11		
Benzo (b) fluoranthene		100	н –	**	19 .	n · —		9	
Benzo (g,h,i) perylene	ND	100	11	†1		11		H	
Benzo (k) fluoranthene	ND	100	n	11		n . 5	. 11	41	
Chrysene	ND	100	н	rt	ěi .	' 11	II	H .	
Dibenz (a,h) anthracene	ND	. 100	II	11	11	11			
Fluoranthene	ND	100	I+	u	H	Ħ	11		G.
Fluorene	ND	100	11	**	n ' '	11	10		
Indeno (1,2,3-cd) pyrene	ND	100	11 *	Н .	er un tra		H	11	
Naphthalene	ND	100	t#		n	Я		"	0
Phenanthrene	ND .	100	*1	**	11	я	11	H	. <b>G</b>
Pyrene	ND	100	ıı		11	11 .			
Surrogate: Nitrobenzene-d5		73.0 %	23-120	)	· n . ·	#	п	#	
Surrogate: 2-Fluorobiphenyl		. 71.0 %	30-115	;	<i>"</i>	"		"	
Surrogate: Terphenyl-d14		72.5 %	18-137	7	. #	,	n	, <i>H</i>	•
buildance respicisficult	•							•	
		Received: 1					10/00/03	ED 4 9270C	
SS-A-5 (K312093-02) Soil	ND	Received: 1	ug/kg dry	1	3120427	12/08/03	12/09/03	EPA 8270C	
SS-A-5 (K312093-02) Soil Acenaphthene	ND ND	Received: 1 100 100	ug/kg dry	i i	**	*1	11	EPA 8270C	
SS-A-5 (K312093-02) Soil Acenaphthene Acenaphthylene Anthracene	ND ND ND	Received: 1 100 100 100	ug/kg dry "	Î II	ff 10	11	11	11	
SS-A-5 (K312093-02) Soil Acenaphthene Acenaphthylene Anthracene	ND ND ND ND	Received: 1 100 100 100 100	ug/kg dry " "	1 "	11 11	11 11 H	11 11 11	1( 19 11	
SS-A-5 (K312093-02) Soil Acenaphthene Acenaphthylene Anthracene Benzo (a) anthracene	ND ND ND ND ND	Received: 1' 100 100 100 100 100 100	ug/kg dry	Î II	11 15 19	11 11 11 11	11 11 11	11	
SS-A-5 (K312093-02) Soil Acenaphthene Acenaphthylene	ND ND ND ND ND ND	Received: 1' 100 100 100 100 100 100 100 100	ug/kg dry " " " "	1 11 11 11 11 11 11 11 11 11 11 11 11 1	11 15 11	11 11 11 11	11 11 11	11 17 01	
Acenaphthene Acenaphthylene Anthracene Benzo (a) anthracene Benzo (b) fluoranthene Benzo (g,h,i) perylene	ND ND ND ND ND ND ND	Received: 1 100 100 100 100 100 100 100	ug/kg dry " " " " "	i	n n n	11 17 17 17 17 17 17 17 17 17 17 17 17 1	11 11 11 11 11 11 11 11 11 11 11 11 11	11 11 11 11	12.7
Acenaphthene Acenaphthylene Anthracene Benzo (a) anthracene Benzo[a]pyrene Benzo (b) fluoranthene	ND ND ND ND ND ND ND	Received: 1 100 100 100 100 100 100 100 1	ug/kg dry " " " " " "	1 11 11 11 11 11 11 11 11 11 11 11 11 1	11 11 11 11 11	11 11 11 11 11 11 11 11 11 11 11 11 11	n u u u u u u u	11 11 11 11 11 11 11 11 11 11 11 11 11	
Acenaphthene Acenaphthylene Anthracene Benzo (a) anthracene Benzo (b) fluoranthene Benzo (g,h,i) perylene	ND ND ND ND ND ND ND ND	Received: 1 100 100 100 100 100 100 100 1	ug/kg dry " " " " " " " " " " " "	1 " " " " " " " " " " " " " " " " " " "	n n n n n n n n n n n n n n n n n n n	91 92 93 94 94 94 94 94 94 94 94 94 94 94 94 94	91 14 17 17 10 11 10	H H H H H H H H H H H H H H H H H H H	
Acenaphthene Acenaphthylene Anthracene Benzo (a) anthracene Benzo (b) fluoranthene Benzo (g,h,i) perylene Benzo (k) fluoranthene	ND ND ND ND ND ND ND ND ND	Received: 1 100 100 100 100 100 100 100 1	ug/kg dry  " " " " " " " " " " " " " " " "	1 11 11 11 11 11 11 11 11 11 11 11 11 1	11 11 11 11 11	11 11 11 11 11 11 11	n  11  11  11  11  11  11  11  11  11	11 11 11 11 11 11 11 11 11 11 11 11 11	
Acenaphthene Acenaphthylene Anthracene Benzo (a) anthracene Benzo (b) fluoranthene Benzo (g,h,i) perylene Benzo (k) fluoranthene Chrysene	ND ND ND ND ND ND ND ND ND	Received: 1  100 100 100 100 100 100 100 100 100	ug/kg dry  " " " " " " " " " " "	1 " " " " " " " " " " " " " " " " " " "	# # # # # # # # # # # # # # # # # # #	11 11 11 11 11 11 11 11 11 11 11 11 11	11 11 11 11 11 11 11 11 11 11 11 11 11	11 11 11 11 11 11 11 11 11 11 11 11 11	(
Acenaphthene Acenaphthylene Anthracene Benzo (a) anthracene Benzo (b) fluoranthene Benzo (g,h,i) perylene Benzo (k) fluoranthene Chrysene Dibenz (a,h) anthracene Fluoranthene	ND ND ND ND ND ND ND ND ND ND	Received: 1  100 100 100 100 100 100 100 100 100	ug/kg dry	1	# # # # # # # # # # # # # # # # # # #	# # # # # # # # # # # # # # # # # # #	11 11 11 11 11 11 11 11 11 11 11 11 11	11 11 11 11 11 11 11 11 11 11 11 11 11	
Acenaphthene Acenaphthylene Anthracene Benzo (a) anthracene Benzo (b) fluoranthene Benzo (g,h,i) perylene Benzo (k) fluoranthene Chrysene Dibenz (a,h) anthracene Fluoranthene	ND ND ND ND ND ND ND ND ND ND	Received: 1  100 100 100 100 100 100 100 100 100	ug/kg dry	1	# # # # # # # # # # # # # # # # # # #	11 17 18 18 18 18 18 18 18 18 18 18 18 18 18	11 11 11 11 11 11 11 11 11 11 11 11 11	11 11 11 11 11 11 11 11 11 11 11 11 11	C
Acenaphthene Acenaphthylene Anthracene Benzo (a) anthracene Benzo (b) fluoranthene Benzo (g,h,i) perylene Benzo (k) fluoranthene Chrysene Dibenz (a,h) anthracene Fluoranthene Fluorene	ND N	Received: 1  100 100 100 100 100 100 100 100 100	ug/kg dry  o  u  u  u  u  u  u  u  u  u  u  u  u	1	# # # # # # # # # # # # # # # # # # #	11 11 11 11 11 11 11 11 11 11 11 11 11	11 11 11 11 11 11 11 11 11 11 11 11 11	11 11 11 11 11 11 11 11 11 11 11 11 11	
Acenaphthene Acenaphthylene Anthracene Benzo (a) anthracene Benzo (b) fluoranthene Benzo (g,h,i) perylene Benzo (k) fluoranthene Chrysene Dibenz (a,h) anthracene Fluoranthene Fluorene Indeno (1,2,3-cd) pyrene	ND N	Received: 1  100 100 100 100 100 100 100 100 100	ug/kg dry  o  ii  ii  ii  ii  ii  ii  ii  ii  ii		# # # # # # # # # # # # # # # # # # #	11 11 11 11 11 11 11 11 11 11 11 11 11	# # # # # # # # # # # # # # # # # # #	H H H H H H H H H H H H H H H H H H H	
Acenaphthene Acenaphthylene Acenaphthylene Anthracene Benzo (a) anthracene Benzo [a]pyrene Benzo (b) fluoranthene Benzo (g,h,i) perylene Benzo (k) fluoranthene Chrysene Dibenz (a,h) anthracene Fluoranthene Fluorene Indeno (1,2,3-cd) pyrene Naphthalene	ND N	Received: 1  100 100 100 100 100 100 100 100 100	ug/kg dry  o  ii  ii  ii  ii  ii  ii  ii  ii  ii	1	# # # # # # # # # # # # # # # # # # #	11 11 11 11 11 11 11 11 11 11 11 11 11	91 14 15 15 16 17 16 17 18 19 19 19 19 19 19 19 19 19 19 19 19 19	11 11 11 11 11 11 11 11 11 11 11 11 11	
Acenaphthene Acenaphthylene Anthracene Benzo (a) anthracene Benzo (b) fluoranthene Benzo (g,h,i) perylene Benzo (k) fluoranthene Chrysene Dibenz (a,h) anthracene Fluoranthene Fluorene Indeno (1,2,3-cd) pyrene Naphthalene Phenanthrene Pyrene	ND N	Received: 1  100 100 100 100 100 100 100 100 100	ug/kg dry "" "" "" "" "" "" "" "" "" "" "" "" ""		# # # # # # # # # # # # # # # # # # #	11 11 11 11 11 11 11 11 11 11 11 11 11	# # # # # # # # # # # # # # # # # # #	11 11 11 11 11 11 11 11 11 11 11 11 11	
Acenaphthene Acenaphthylene Anthracene Benzo (a) anthracene Benzo (b) fluoranthene Benzo (g,h,i) perylene Benzo (k) fluoranthene Chrysene Dibenz (a,h) anthracene Fluoranthene Fluorene Indeno (1,2,3-cd) pyrene Naphthalene Phenanthrene	ND N	Received: 1  100 100 100 100 100 100 100 100 100	ug/kg dry "" "" "" "" "" "" "" "" "" "" "" "" ""	1	# # # # # # # # # # # # # # # # # # #	11 11 11 11 11 11 11 11 11 11 11 11 11	91 14 15 15 16 17 16 17 18 19 19 19 19 19 19 19 19 19 19 19 19 19	11 11 11 11 11 11 11 11 11 11 11 11 11	

GLA Laboratories

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(610) 337-9992 • FAX (610) 337-9939

(732) 661-0777 • FAX (732) 661-0305

PENN E & R 2755 Bergey Rd Hatfield PA, 19440 Project: Balderston / W. Brandywine

Project Number: [none]

Project Manager: Don Coleman

Reported:

12/12/03 18:10

#### Physical Parameters by APHA/ASTM/EPA Methods

#### **GLA Laboratories**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
SS-A-3 (K312093-01) Soil	Sampled: 12/03/03 13:15	Received: 12/	/03/03 14:	25					
% Solids	82.3	0.01%	by Weigh	t 1	3120401	12/04/03	12/04/03	EPA 160.3	
SS-A-5 (K312093-02) Soil	Sampled: 12/03/03 13:45	Received: 12	/03/03 14:	25					
% Solids	83.2	0.01%	by Weigh	t 1	3120401	12/04/03	12/04/03	EPA 160.3	

GLA Laboratories

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PENN E & R 2755 Bergey Rd Hatfield PA, 19440

RPD

Relative Percent Difference

Project: Balderston / W. Brandywine

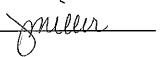
Project Number: [none]

Project Manager: Don Coleman

Reported: 12/12/03 18:10

#### **Notes and Definitions**

DILN	Due to matrix interference and or sample dilution the detection limits for this sample have been elevated.
G2	The matrix QC recoveries associated with this sample were below the laboratory's established acceptance criteria.
G4	The laboratory control spike recoveries associated with this sample were below the laboratory's established acceptance criteria.
O4	One or more surrogate recoveries were below the laboratory's established acceptance criteria.
O8	The preservative in this sample produced ketones, the detection limits have been elevated for those compounds.
<u>P</u>	The average response factor met method criteria for the check standard following this sample however these compounds were low: endrin ketone, methoxychlor
Pa	The average response factor met method criteria for the check standard following this sample however these compounds were low: endrin ketone, methoxychlor,DDT
DET	Analyte DETECTED .
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis



K312093

**GLA Laboratories** 

Client: PENN E & R

Project: Balderston / W. Brandywine

Project Manager: Project Number:

Jill Miller [none]

Printed: 12/3/2003 5:12:09PM

Report To:

PENN E & R

Don Coleman

2755 Bergey Rd Hatfield, PA 19440

Phone: 215-997-9000

Fax: (215) 822-8575

Invoice To:

PENN E & R

Don Coleman

2755 Bergey Rd

Hatfield, PA 19440

Phone: 215-997-9000 Fax: (215) 822-8575

Date Due:

12/09/03 18:00 (4 day TAT)

Received By:

Amy Zanck

Date Received:

12/03/03 14:25

Logged In By:

Oswaldo Burgos

Received On Ice

Date Logged In:

12/03/03 17:09

Samples Received at:

Custody Seals

0°C

- No

Containers Intact

COC/Labels Agree Yes Preservation Confir Yes

Analysis	Due	TAT	Expires	Comments	
K312093-01 SS-A-3 [Soi	il] Sampled 12/03/03 13:	15 Eastern		PA ACT 2	
8260	12/09/03 17:00	4	12/17/03 13:15		
8270 PAH	12/09/03 17:00	4	12/17/03 13:15		
PCB 8082	12/09/03 17:00	4	12/17/03 13:15		
Pests 8081	12/09/03 17:00	4	12/17/03 13:15		
RCRA Metals Soil	12/09/03 17:00	4	12/08/03 13:15		
Solids, Dry Weight	12/09/03 17:00	4	01/02/04 13:15	·	
K312093-02 SS-A-\$ [Soi	l] Sampled 12/03/03 13:	45 Eastern		PA ACT 2	
8260	12/09/03 17:00	4	12/17/03 13:45		
8270 PAH	12/09/03 17:00	4	12/17/03 13:45		
	12/09/03 17.00	•	12. 17.00 10.10		
PCB 8082	12/09/03 17:00	4	12/17/03 13:45		
•					
PCB 8082	12/09/03 17:00	4	12/17/03 13:45		

Analysis groups included in this work order

RCRA Metals Soil

Hg Soil 7471 Metals, RCRA ICP

Reviewed By

Date

Page 1 of 1

CHAIN OF CUSTODY RAFORM

LABORATORIES

1008 W. Ninth Ave. King of Prussia, PA 19406 (610) 337-9992 FAX (610) 337-9939

State & Process  Program: Act Z Fext # () Schipping #: () Schi
Process #: (SAMPLE Processor #
# of Bottles Preservative Used   Preservative
2
2 1 4 X 4 C
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