



Central Vermont Public Service Corporation

March 15, 2012

Ms. Kimberly N. Tisa, PCB Coordinator
U.S. Environmental Protection Agency Region I
5 Post Office Square, Suite 100
Mail Code: OSRR07-2
Boston, MA 02109-3912

Subject: CVPS Randolph Substation, Randolph, VT
Self-implementing Cleanup Notification for Randolph Substation

Dear Ms. Tisa,

Central Vermont Public Service Corporation (CVPS) plans to rebuild an electric substation located in Randolph, VT in 2012. The project will involve the removal of all electrical equipment, fencing, soils and concrete slabs and foundations from within the substation. Preliminary soil and concrete sampling conducted at the substation on August 4, 2011 identified the presence of PCBs in both soil and concrete composite samples collected.

The substation is over 50 years old. The oil-filled electrical equipment currently contained in the substation have historically contained PCB oils having a concentration greater than 50 parts per million (ppm). Recently identified PCB impacts within the substation are likely the result of historic releases from this equipment, and contaminated soil and concrete within the substation are regulated under 40 CFR 761.

The purpose of this letter is to provide the notification required at 40 CFR 761.61(a)(3) for eventual self-implementing cleanup of any contaminated substation soil and media. CVPS plans to remove the contaminated materials during 2012.

1. Nature of contamination – materials contaminated

PCB impacts to soil were detected in multiple soil and concrete samples collected from within and immediately outside the substation fenceline during the August 4, 2011 sampling event. A summary of sample results and locations are presented in Table 1 below.

Given the small size of the substation (approximately 25' x 50') additional soil and concrete sampling was not performed. CVPS proposes to dispose of all soil and concrete from the substation in accordance with the requirements of 40 CFR 761.61.

Table 1
Soil and Concrete Analytical Results – Randolph Substation
Sample Date: 08/04/2011

<i>Sample ID</i>	Concrete Composite 1	Concrete Composite 2	Concrete Composite 3	Concrete Composite 4	Soil Composite 5	Soil Composite 6	Soil Composite 7	Soil Composite 8	
<i>Sample Location</i>	See Sample Location Map								
<i># Grabs per Composite</i>	8	10	8	10	3	6	8	8	
<i>Analyte Conc. (ug/kg)</i>	PCB	0.09	1.5	nd(0.03)	0.8	1.56	20	0.24	18
	TPH	8,200	800	94	830	1,900	3,800	820	900
	Arsenic	7.0	8.0	6.4	9.9	6.1	4.5	4.8	5.5
	Barium	110	63	58	81	58	45	42	29
	Cadmium	4.9	3.4	1.6	5.4	2.8	6.0	1.2	1.9
	Chromium	23	20	14	17	16	17	21	14
	Lead	68	27	14	59	430	260	220	120
	Mercury	0.6	0.7	0.7	0.7	nd(0.1)	0.1	nd(0.1)	nd(0.1)
	Selenium	nd(0.5)	nd(0.5)	nd(0.5)	nd(0.5)	nd(0.5)	nd(0.5)	nd(0.5)	nd(0.5)
Silver	nd(0.5)	nd(0.5)	nd(0.5)	nd(0.5)	nd(0.5)	18	0.9	nd(0.5)	
Lead (TCLP)	not tested	not tested	not tested	not tested	0.5	0.7	nd(0.5)	nd(0.5)	

2. Sampling procedures and results of pre-cleanup characterization.

Two composite soil samples and four composite concrete samples were collected inside the approximately 25 x 50 foot substation yard on August 4, 2011 from shallow soils – 1 to 4 inches below ground surface in soils, 1 to 2 inches from the surface of concrete foundations. Two additional composite soil samples were collected adjacent to the substation fenceline (both in and outside the substation) along the east and west sides.

3. Location and extent of the contaminated area

The location of the substation is shown on the attached Area Map and Site Location Map attached to this notification. A substation plan showing approximate sample locations is also attached.

4. Cleanup Plan – schedule, disposal technology, and approach

Additional characterization sampling within the substation is not planned. Following the removal of the remaining electrical equipment, the cleanup plan will include removal of the upper one to two feet of soil across the existing footprint of the substation yard and extending a minimum of 1.5 feet beyond the current substation fenceline. Soil and concrete removed from the Site will be trucked to Waste Management’s Model City landfill in Model City, New York. Confirmatory sampling, in accordance with Subpart O of 40 CFR 761 will be performed by CVPS environmental staff to determine if soil removal must be continued either laterally or vertically in order to meet the high occupancy cleanup standard.

Concrete foundations and footings will also be removed and disposed of with the TSCA regulated soils in accordance with the requirements of 40 CFR 761.61 in a TSCA approved facility (Waste Management’s Model City landfill in Model City, New York). The remediation work will be scheduled in 2012 once substation decommissioning is scheduled and the substation has been deenergized. Once removal of soils

and concrete is complete, verification samples will be collected. Once the cleanup objective is attained, the area will be restored to grade and a new substation constructed in the same location.

5. Owner's Certification

All sampling plans, sample collection procedures, sample preparation procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site are on file in CVPS's office in Rutland, VT and available for EPA inspection.

Central Vermont Public Service Corporation



Beth Eliason, P.E.
(Property owner representative)

Attachments

- Figure 1. Site Location Map
- Figure 2. Facility Diagram
- Figure 3. Soil and Concrete Sample Location Map – 8/24/2011
- Eastern Analytical Inc. Laboratory Report ID 102021 – 8/4/2011
- Eastern Analytical Inc. Laboratory Report ID 102614 – 9/9/2011

cc: Chuck Schwer, Vermont DEC, Sites Management Section
John Greenan, CVPS
John Fiske, CVPS
Barry Donovan, CVPS



Site Location Map

**Randolph Substation
71 Vermont Route 12 South
Randolph, Vermont**



This map is for the sole use of Central Vermont Public Service Corporation (CVPS). CVPS makes no representation as to the accuracy or authenticity of this map. Data sources include CVPS and Vermont Center for Geographic Information. www.vcgi.org



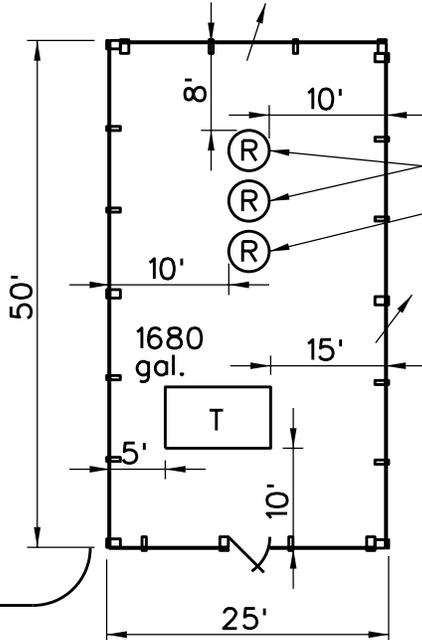
↑ STEEP DROP ↑

TOP OF BANK

ROUTE 12

LAWN

50'



75 gal. EA
84 gal.

PAVED

FORMER CVPS
SERVICE CENTER

ACCESS

PARKING LOT

SHAW'S SUPERMARKET
&
AUBUCHON HARDWARE

LEGEND



OIL-FILLED TRANSFORMER



OIL-FILLED VOLTAGE REGULATOR



OIL-FILLED CIRCUIT BREAKER



ANTICIPATED DIRECTION
OF DRAINAGE FLOW

SUBSTATION SOIL IS STONE AND SAND
NO NEARBY DRAINAGE OR WATER

REV. NO.	REVISED BY	DATE
1	RMK - CVPS	AUG. 2009



CENTRAL VERMONT PUBLIC SERVICE CORPORATION
ROYALTON DISTRICT

RANDOLPH SUBSTATION

FACILITY DIAGRAM

DuBois & King, Inc.

DRAWN BY ASJ	DATE DEC. 2002
CHECKED BY RBN	PROJ. NO. R17642
PROJ. ENG. RBN	DRAW. NO.

NOT TO SCALE

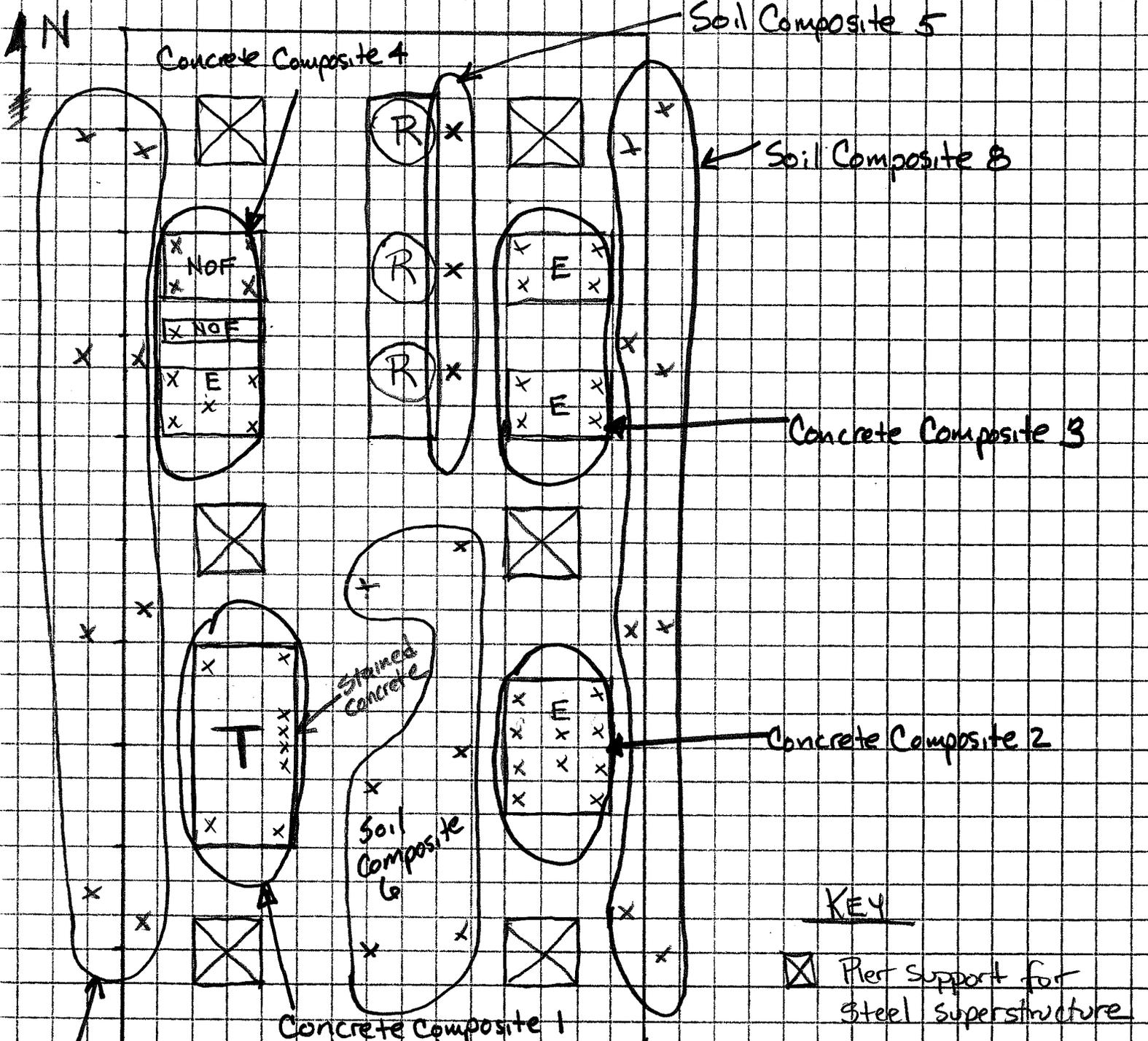
DIVISION: Randolph Substation

FILE _____

SUBJECT: Soil & Concrete Sample Locations - 8/14/2011

DATE 8/11/11

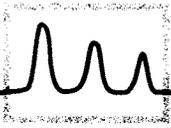
MADE BY BE



- KEY
- ⊠ Pier support for Steel Superstructure
 - E Empty Concrete Slab
 - NOF No oil-filled equip.
 - T Transformer
 - R Regulator

x - Approximate Sample Location

* Not to Scale



Beth Eliason
Central Vermont Public Service Corporation
PO Box 608
Rutland , VT 05701



Subject: Laboratory Report

Eastern Analytical, Inc. ID: 102021
Client Identification: Randolph Substation
Date Received: 8/8/2011

Dear Ms. Eliason :

Enclosed please find the laboratory report for the above identified project. All analyses were performed in accordance with our QA/QC Program. Unless otherwise stated, holding times, preservation techniques, container types, and sample conditions adhered to EPA Protocol. Samples which were collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures. Eastern Analytical, Inc. certifies that the enclosed test results meet all requirements of NELAP and other applicable state certifications. Please refer to our website at www.eailabs.com for a copy of our NELAP certificate and accredited parameters.

The following standard abbreviations and conventions apply to all EAI reports:
Solid samples are reported on a dry weight basis, unless otherwise noted
< : "less than" followed by the reporting limit
> : "greater than" followed by the reporting limit
%R : % Recovery

Eastern Analytical Inc. maintains certification in the following states: Connecticut (PH-0492), Maine (NH005), Massachusetts (M-NH005), New Hampshire/NELAP (1012), Rhode Island (269) and Vermont (VT1012).

The following information is contained within this report: Sample Conditions summary, Analytical Results/Data, Quality Control data (if requested) and copies of the Chain of Custody. This report may not be reproduced except in full, without the the written approval of the laboratory.

If you have any questions regarding the results contained within, please feel free to directly contact me or the chemist(s) who performed the testing in question. Unless otherwise requested, we will dispose of the sample(s) 30 days from the sample receipt date.

We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,


Lorraine Olashaw, Lab Director

8.23.11
Date

8
of pages (excluding cover letter)



SAMPLE CONDITIONS PAGE

EAI ID#: 102021

Client: **Central Vermont Public Service Corporation**

Client Designation: **Randolph Substation**

Temperature upon receipt (°C): **4.8**

Received on ice or cold packs (Yes/No): **Y**

Acceptable temperature range (°C): 0-6

Lab ID	Sample ID	Date Received	Date Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
102021.01	Concrete Composite #1	8/8/11	8/4/11	solid	97.1	Adheres to Sample Acceptance Policy
102021.02	Concrete Composite #2	8/8/11	8/4/11	solid	97.6	Adheres to Sample Acceptance Policy
102021.03	Concrete Composite #3	8/8/11	8/4/11	solid	97.0	Adheres to Sample Acceptance Policy
102021.04	Substaion Concrete -pH Comp.	8/8/11	8/4/11	solid	97.5	Adheres to Sample Acceptance Policy
102021.05	Concrete Composite #4	8/8/11	8/4/11	solid	96.6	Adheres to Sample Acceptance Policy
102021.06	Soil Composite #5	8/8/11	8/4/11	soil	99.1	Adheres to Sample Acceptance Policy
102021.07	Soil Composite #6	8/8/11	8/4/11	soil	99.2	Adheres to Sample Acceptance Policy
102021.08	Soil Composite #7	8/8/11	8/4/11	soil	97.5	Adheres to Sample Acceptance Policy
102021.09	Soil Composite #8	8/8/11	8/4/11	soil	98.0	Adheres to Sample Acceptance Policy

Samples were properly preserved and the pH measured when applicable unless otherwise noted. Analysis of solids for pH, Flashpoint, Ignitibility, Paint Filter, Corrosivity, Conductivity and Specific Gravity are reported on an "as received" basis.

All results contained in this report relate only to the above listed samples.

References include:

- 1) EPA 600/4-79-020, 1983
- 2) Standard Methods for Examination of Water and Wastewater : Inorganics, 19th Edition, 1995; Microbiology, 20th Edition, 1998
- 3) Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
- 4) Hach Water Analysis Handbook, 2nd edition, 1992



LABORATORY REPORT

EAI ID#: 102021

Client: **Central Vermont Public Service Corporation**

Client Designation: **Randolph Substation**

Sample ID:	Concrete Composite #1	Concrete Composite #2	Concrete Composite #3	Concrete Composite #4	Soil Composite #5	Soil Composite #6	Soil Composite #7
Lab Sample ID:	102021.01	102021.02	102021.03	102021.05	102021.06	102021.07	102021.08
Matrix:	solid	solid	solid	solid	soil	soil	soil
Date Sampled:	8/4/11	8/4/11	8/4/11	8/4/11	8/4/11	8/4/11	8/4/11
Date Received:	8/8/11	8/8/11	8/8/11	8/8/11	8/8/11	8/8/11	8/8/11
Units:	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Date of Extraction/Prep:	8/10/11	8/10/11	8/10/11	8/10/11	8/10/11	8/10/11	8/10/11
Date of Analysis:	8/12/11	8/11/11	8/11/11	8/11/11	8/11/11	8/11/11	8/11/11
Analyst:	LAS	LAS	LAS	LAS	LAS	LAS	LAS
Method:	8100mod	8100mod	8100mod	8100mod	8100mod	8100mod	8100mod
Dilution Factor:	30	2	2	2	10	10	10
TPH (C9-C40)	8200	800	94	830	1900	3800	820
p-Terphenyl-D14 (TPH surr)	DOR	MI	84 %R	MI	DOR	DOR	DOR

DOR: Diluted Out of Range

MI: Matrix Interference



LABORATORY REPORT

EAI ID#: 102021

Client: **Central Vermont Public Service Corporation**

Client Designation: **Randolph Substation**

Sample ID: Soil Composite #8

Lab Sample ID: 102021.09
Matrix: soil
Date Sampled: 8/4/11
Date Received: 8/8/11
Units: mg/kg
Date of Extraction/Prep: 8/10/11
Date of Analysis: 8/11/11
Analyst: LAS
Method: 8100mod
Dilution Factor: 10

TPH (C9-C40) 900
p-Terphenyl-D14 (TPH surr) DOR

DOR: Diluted Out of Range



LABORATORY REPORT

EAI ID#: 102021

Client: **Central Vermont Public Service Corporation**

Client Designation: **Randolph Substation**

Sample ID:	Concrete Composite #1	Concrete Composite #2	Concrete Composite #3	Concrete Composite #4	Soil Composite #5	Soil Composite #6	Soil Composite #7
Lab Sample ID:	102021.01	102021.02	102021.03	102021.05	102021.06	102021.07	102021.08
Matrix:	solid	solid	solid	solid	soil	soil	soil
Date Sampled:	8/4/11	8/4/11	8/4/11	8/4/11	8/4/11	8/4/11	8/4/11
Date Received:	8/8/11	8/8/11	8/8/11	8/8/11	8/8/11	8/8/11	8/8/11
% Solid:	97.1	97.6	97	96.6	99.1	99.2	97.5
Units:	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Date of Extraction/Prep:	8/9/11	8/9/11	8/9/11	8/9/11	8/9/11	8/9/11	8/9/11
Date of Analysis:	8/11/11	8/11/11	8/11/11	8/11/11	8/11/11	8/11/11	8/11/11
Analyst:	JW	JW	JW	JW	JW	JW	JW
Extraction Method:	3540C	3540C	3540C	3540C	3540C	3540C	3540C
Analysis Method:	8082	8082	8082	8082	8082	8082	8082
Dilution Factor:	2	2	2	2	1	1	1
PCB-1016	< 0.03	< 0.03	< 0.03	< 0.03	< 0.02	< 0.02	< 0.02
PCB-1221	< 0.03	< 0.03	< 0.03	< 0.03	< 0.02	< 0.02	< 0.02
PCB-1232	< 0.03	< 0.03	< 0.03	< 0.03	< 0.02	< 0.02	< 0.02
PCB-1242	< 0.03	< 0.03	< 0.03	< 0.03	< 0.02	< 0.02	< 0.02
PCB-1248	< 0.03	< 0.03	< 0.03	< 0.03	< 0.02	< 0.02	< 0.02
PCB-1254	0.04	1.5	< 0.03	0.8	0.56	20	0.19
PCB-1260	0.05	< 0.03	< 0.03	< 0.03	1.0	< 0.02	0.05
TMX (surr)	71 %R	85 %R	90 %R	80 %R	77 %R	74 %R	81 %R
DCB (surr)	77 %R	79 %R	87 %R	78 %R	81 %R	86 %R	78 %R

Acid cleanup was performed on the samples and associated Batch QC.

Samples Concrete Composite #1, Concrete Composite #2, Concrete Composite #3, and Concrete Composite #4: The dilution factor and reporting limits are elevated due to the lower initial mass used to prepare the samples.

Samples Concrete Composite #2 and Concrete Composite #4 were re-analyzed at a 5X dilution for Aroclor 1254 on 8/15/11. Sample Soil Composite #5 was re-analyzed at a 5X dilution for Aroclor 1254 and Aroclor 1260 on 8/15/11. Sample Soil Composite #6 was re-analyzed at a 100X dilution for Aroclor 1254 on 8/15/11.



LABORATORY REPORT

EAI ID#: 102021

Client: **Central Vermont Public Service Corporation**

Client Designation: **Randolph Substation**

Sample ID:	Soil Composite #8
Lab Sample ID:	102021.09
Matrix:	soil
Date Sampled:	8/4/11
Date Received:	8/8/11
% Solid:	98
Units:	mg/kg
Date of Extraction/Prep:	8/9/11
Date of Analysis:	8/11/11
Analyst:	JW
Extraction Method:	3540C
Analysis Method:	8082
Dilution Factor:	1

PCB-1016	< 0.02
PCB-1221	< 0.02
PCB-1232	< 0.02
PCB-1242	< 0.02
PCB-1248	< 0.02
PCB-1254	18
PCB-1260	< 0.02
TMX (surr)	80 %R
DCB (surr)	89 %R

Acid cleanup was performed on the samples and associated Batch QC.

Sample Soil Composite #8 was re-analyzed at a 100X dilution for Aroclor 1254 on 8/15/11.



LABORATORY REPORT

EAI ID#: 102021

Client: **Central Vermont Public Service Corporation**

Client Designation: **Randolph Substation**

Sample ID: Substaion Concrete
-pH Comp.

Lab Sample ID: 102021.04

Matrix: solid

Date Sampled: 8/4/11

Date Received: 8/8/11

pH 12.2

Analysis

Units	Date	Time	Method	Analyst
SU	8/11/11	16:50	9045	SKC



LABORATORY REPORT

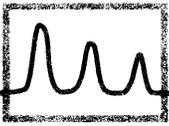
EAI ID#: 102021

Client: **Central Vermont Public Service Corporation**

Client Designation: **Randolph Substation**

Sample ID:	Concrete Composite #1	Concrete Composite #2	Concrete Composite #3	Concrete Composite #4					
Lab Sample ID:	102021.01	102021.02	102021.03	102021.05					
Matrix:	solid	solid	solid	solid					
Date Sampled:	8/4/11	8/4/11	8/4/11	8/4/11	Analytical Matrix	Units	Date of Analysis	Method	Analyst
Date Received:	8/8/11	8/8/11	8/8/11	8/8/11					
Arsenic	7.0	8.0	6.4	9.9	SolTotDry	mg/kg	8/15/11	6020	DS
Barium	110	63	58	81	SolTotDry	mg/kg	8/15/11	6020	DS
Cadmium	4.9	3.4	1.6	5.4	SolTotDry	mg/kg	8/15/11	6020	DS
Chromium	23	20	14	17	SolTotDry	mg/kg	8/15/11	6020	DS
Lead	68	27	14	59	SolTotDry	mg/kg	8/15/11	6020	DS
Mercury	0.6	0.7	0.7	0.7	SolTotDry	mg/kg	8/15/11	6020	DS
Selenium	< 0.5	< 0.5	< 0.5	< 0.5	SolTotDry	mg/kg	8/15/11	6020	DS
Silver	< 0.5	< 0.5	< 0.5	< 0.5	SolTotDry	mg/kg	8/15/11	6020	DS

Sample ID:	Soil Composite #5	Soil Composite #6	Soil Composite #7	Soil Composite #8					
Lab Sample ID:	102021.06	102021.07	102021.08	102021.09					
Matrix:	soil	soil	soil	soil					
Date Sampled:	8/4/11	8/4/11	8/4/11	8/4/11	Analytical Matrix	Units	Date of Analysis	Method	Analyst
Date Received:	8/8/11	8/8/11	8/8/11	8/8/11					
Arsenic	6.1	4.5	4.8	5.5	SolTotDry	mg/kg	8/15/11	6020	DS
Barium	58	45	42	29	SolTotDry	mg/kg	8/15/11	6020	DS
Cadmium	2.8	6.0	1.2	1.9	SolTotDry	mg/kg	8/15/11	6020	DS
Chromium	16	17	21	14	SolTotDry	mg/kg	8/15/11	6020	DS
Lead	430	260	220	120	SolTotDry	mg/kg	8/15/11	6020	DS
Mercury	< 0.1	0.1	< 0.1	< 0.1	SolTotDry	mg/kg	8/15/11	6020	DS
Selenium	< 0.5	< 0.5	< 0.5	< 0.5	SolTotDry	mg/kg	8/15/11	6020	DS
Silver	0.6	18	0.9	< 0.5	SolTotDry	mg/kg	8/15/11	6020	DS



Beth Eliason
Central Vermont Public Service Corporation
PO Box 608
Rutland , VT 05701



Subject: Laboratory Report

Eastern Analytical, Inc. ID: 102614
Client Identification: Randolph Substation
Date Received: 8/8/2011

Dear Ms. Eliason :

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Sincerely,


Lorraine Olashaw, Lab Director

9.9.11
Date

3
of pages (excluding cover letter)



SAMPLE CONDITIONS PAGE

EAI ID#: 102614

Client: **Central Vermont Public Service Corporation**

Client Designation: **Randolph Substation**

Temperature upon receipt (°C): **4.8**

Received on ice or cold packs (Yes/No): **Y**

Acceptable temperature range (°C): 0-6

Lab ID	Sample ID	Date Received	Date Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
102614.01	Soil Composite #5	8/8/11	8/4/11	soil		Adheres to Sample Acceptance Policy
102614.02	Soil Composite #6	8/8/11	8/4/11	soil		Adheres to Sample Acceptance Policy
102614.03	Soil Composite #7	8/8/11	8/4/11	soil		Adheres to Sample Acceptance Policy
102614.04	Soil Composite #8	8/8/11	8/4/11	soil		Adheres to Sample Acceptance Policy

Samples were properly preserved and the pH measured when applicable unless otherwise noted. Analysis of solids for pH, Flashpoint, Ignitibility, Paint Filter, Corrosivity, Conductivity and Specific Gravity are reported on an "as received" basis.

All results contained in this report relate only to the above listed samples.

References include:

- 1) EPA 600/4-79-020, 1983*
- 2) Standard Methods for Examination of Water and Wastewater : Inorganics, 19th Edition, 1995; Microbiology, 20th Edition, 1998*
- 3) Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB*
- 4) Hach Water Analysis Handbook, 2nd edition, 1992*



LABORATORY REPORT

EAI ID#: 102614

Client: **Central Vermont Public Service Corporation**

Client Designation: **Randolph Substation**

Sample ID:	Soil Composite #5	Soil Composite #6	Soil Composite #7	Soil Composite #8					
Lab Sample ID:	102614.01	102614.02	102614.03	102614.04					
Matrix:	soil	soil	soil	soil					
Date Sampled:	8/4/11	8/4/11	8/4/11	8/4/11	Analytical		Date of		
Date Received:	8/8/11	8/8/11	8/8/11	8/8/11	Matrix	Units	Analysis	Method	Analyst
Lead	0.5	0.7	< 0.5	< 0.5	TCLPsolid	mg/L	9/7/11	6020	DS

