

FEB 14 2000

UNDERGROUND  
ENGINEERING &  
ENVIRONMENTAL  
SOLUTIONS

Haley & Aldrich, Inc.  
340 Granite Street, 3rd Floor  
Manchester, NH 03102-4004  
Tel: 603.625.5353  
Fax: 603.624.8307  
www.HaleyAldrich.com



9 February 2000  
File No. 60477-041

Waste Management Section  
Department of Environmental Conservation  
State of Vermont Agency of Natural Resources  
West Office Building  
103 So. Main Street  
Waterbury, Vermont 05671-0404

Attention: Mr. Richard Speise

Subject: Removal of Lead Impacted Soil and Request for Site Management  
Activity Completed Status  
Winmill Publishing Corp.  
5 Town Crier Drive  
Brattleboro, Vermont 05302

Dear Mr. Speise:

This report presents discussion of activities related to removal of soils containing elevated concentrations of lead from the former Winmill Publishing Corp. property (site), located at 5 Town Crier Drive in Brattleboro, Vermont (Figure 1). Other environmental conditions are also discussed and conclusions and recommendations relative to environmental conditions at the site are provided. Haley & Aldrich, Inc. prepared this report on behalf of Mr. Roger Miller, the site co-owner.

**BACKGROUND**

Haley & Aldrich, Inc. performed a Phase I Environmental Site Assessment (ESA) of the site during May 1999. During performance of the ESA, Haley & Aldrich encountered detection of some compounds in soil and water samples that suggested a potential release of hazardous substances at the site, requiring notice to the Agency of Natural Resources (ANR). Notice was given to Mr. Chuck Schwer of the Vermont ANR by Haley & Aldrich's letter report dated 3 June 1999. Muriel Robinette of Haley & Aldrich discussed the letter report with Mr. Richard Speise of the ANR on 9 August 1999.

Locations of soil and water samples and analytical results for the samples included in our 3 June 1999 report are shown on Figure 2. Results of analyses that indicated the potential for environment impacts including the following:

**OFFICES**

- Boston  
Massachusetts
- Charles Town  
West Virginia
- Cleveland  
Ohio
- Denver  
Colorado
- Hartford  
Connecticut
- Los Angeles  
California
- Newark  
New Jersey
- Portland  
Maine
- Rochester  
New York
- San Diego  
California
- San Francisco  
California
- Washington  
District of Columbia

Lead in soil. Soil sample SS-1 was obtained from the ground surface adjacent to the outfall of a drain pipe, which protrudes from a steep slope to the east of the building. This pipe is connected to the building roof drain and was also formerly connected to a floor drain located in the press room area of the building (Figure 2). The floor drain was closed in May 1999.

SS-1 was analyzed for polynuclear aromatic hydrocarbons (PAHs) by EPA Method 8270 and the eight metals regulated under the Resource Conservation and Recovery Act (RCRA). An elevated concentration of lead (3,100 mg/kg) was detected in SS-1. The lead concentration in SS-1 was greater than the Vermont standard of 400 mg/kg for lead in soil. Low concentrations of PAHs were also detected in sample SS-1.

SS-2 was obtained from a location approximately 4 feet down slope from SS-1 at a depth of approximately 2 feet bgs. SS-2 was analyzed for lead based on the detection of a high concentration of lead in SS-1. The concentration of lead detected in SS2 (480 mg/kg) was approximately one order of magnitude lower than that detected in SS-1, but greater than the 400 mg/kg standard.

- Lead in storm drain water. A water sample, DS-1, was obtained from the bottom of a storm drain located in the northwestern corner of the parking area (Figure 3). Surface water runoff is expected to collect in this storm drain. Additionally, a floor drain located in the northeastern loading area of the building was previously connected to this storm drain. The floor drain was reportedly closed on 24 May 1999, subsequent to collection of water sample DS-1. The discharge location for the storm drain could not be determined at the time of the Phase I ESA. However, Mr. Miller indicated that the storm drain may have no outlet.

DS-1 was analyzed for RCRA metals (total) and VOCs. No VOCs were detected at concentrations greater than laboratory detection limits. Low concentrations of metals detected in DS-1 included arsenic (0.006 mg/l (ppm)), barium (0.034 ppm), chromium (0.023 ppm), and lead (0.021 ppm). The concentration of lead was slightly greater than the Primary Groundwater Quality Standard (PGQS) of 0.015 ppm included in the State of Vermont Groundwater Protection Rule and Strategy.

- PAHs in surficial soil sample. Low concentrations of PAHs, total petroleum hydrocarbons (TPH), VOCs (toluene and xylenes) and metals were detected in a surficial soil sample obtained near the dumpsters (Figure 2). Metals concentrations reported in the sample appeared consistent with background levels.

The following recommendations were provided in our 3 June 1999 letter report:

- Additional soil sampling and analysis to investigate the extent of lead impacts in the drain outfall area and, following a determination of the extent of impacts and disposal requirements for impacted soil, excavation and appropriate off-site disposal of the impacted soil; and
- Investigate the potential presence of a dry well reportedly located east of the building.

Subsequent conversations with Mr. Miller indicated that the suspected dry well was not present at the facility.

#### **POTENTIAL SOURCES OF IMPACTS**

Sources of lead detected in soil at the roof drain pipe outfall and in water in a separate storm drain could not be determined from readily available information. According to Mr. Miller, lead was not used in the printing process. Therefore, lead would not be expected to found in discharge from floor drains that were previously connected to the roof and parking lot drains where impacts by lead were detected. Mr. Miller indicated that the roof of the facility consists of rubber, and would not be a potential source of lead. According to Mr. Miller, a potential source of lead from within the facility was a lead sledge hammer that was used for loading heavy rolls of paper onto the printing press. The hammer was constructed of lead to avoid damage to the steel rolls of paper. Mr. Miller indicated that the hammer was used over a period of approximately 20 years, possibly resulting in minute lead fragments being discharged through the floor drain adjacent to the press.

If a source of lead was present previously present within the building, the pathway for lead migration was eliminated by closure of the floor drains in May 1999. Consequently, both drains, where impacts related to lead were detected, now convey only storm water from either roof or parking lot runoff.

Haley & Aldrich contacted the City of Brattleboro Department of Public Works (DPW) relative to whether the on-site storm drain was connected to the municipal storm drain system. The DPW indicated that it had no record of connection of the drain to the municipal storm drains. Consequently, it appears that water in the drain may not discharge off-site to surface water. If the storm drain discharges to the subsurface at the drain location, it appears unlikely that the low concentration of lead reported in the sample from the drain would significantly impact groundwater. Based on site topography (i.e., the difference between the site elevation and the elevation of the Connecticut River and the absence of groundwater seeps on slope between the site and the river), groundwater appears to occur at significant depth beneath the site.

The source of low concentrations of PAHs, VOCs and TPH in soil sample S3 appears to be small asphalt fragments from broken pavement in the area of sample collection.

#### **INVESTIGATION OF EXTENT OF LEAD IMPACTED SOIL**

Haley & Aldrich personnel revisited the site on 23 August 1999 to collect additional soil samples to determine the approximate extent of lead-impacted soil in the drainage swale. Terrain within and adjacent to the drainage swale slopes steeply downward to the east toward the Connecticut River.

Twelve soil samples were collected using a hand trowel within the drainage swale, between the pipe outfall and approximately 20 feet down slope. Depth of samples ranged from 2 inches bgs to 6 to 8 inches bgs. Excavation by hand was difficult due primarily to the network of roots underlying the swale. Consequently, sampling was limited in depth and focused on determining the lateral extent of lead impacts in soil.

Four of the soil samples (SS107, SS109, SS110 AND SS111) were submitted to Aquarian Analytical, Inc. for analysis for total lead. The approximate locations of the samples are shown on Figure 3. Analytical data reports for the samples are included in Appendix A of this report. Locations and lead concentrations detected in the samples are summarized below.

- Sample SS-107 was obtained at a depth of 0 to 2 inches bgs, approximately 9 feet down slope of the discharge pipe. Lead was detected in SS-107 at a concentration of 700 mg/kg.
- Sample SS-109 was taken at a depth of 0 to 2 inches bgs, approximately 11 feet down slope of the discharge pipe. Lead was detected in SS-109 at a concentration of 130 mg/kg.
- Sample SS-110 was taken at a depth of 2 to 4 inches bgs, approximately 11 feet down slope of the discharge pipe. Lead was detected in SS-110 at a concentration of 240 mg/kg.
- Sample SS-111 was taken at a depth of 0 to 2 inches bgs, approximately 20 feet down slope of the discharge pipe. Lead was detected in SS-111 at a concentration of 130 mg/kg.

Based on the results of the analyses, the presence of elevated concentrations of lead (i.e., greater than 400 mg/kg) appeared to be located within approximately 11 feet downslope of the pipe outfall and extending to a depth of up to 2 feet or more within the swale immediately adjacent to the pipe outfall.

## **SOIL REMOVAL, ANALYSIS AND DISPOSAL**

### **Soil Removal**

Excavation of lead-impacted soil in the drainage swale was performed by Cyn Environmental Services (Cyn) of Springfield, Massachusetts under the observation by Haley & Aldrich on 4 October 1999.

Based on the apparent extent of lead impacts indicated by previous analyses and observations, excavation of the impacted soil focused on removal of impacted soils from the swale to the lateral extent and depth identified by previous analyses.

- Due to steep terrain in the vicinity of the soils to be excavated, soils were excavated by hand by Cyn personnel. A chain saw was used to remove roots and a small tree that impeded excavation approximately 9 feet down slope. Soils were excavated from beneath the pipe outfall to approximately 11 feet down slope, to depths ranging from approximately 3.5 feet bgs at the outfall to approximately 8 inches bgs at the furthest down-slope location. The depth of excavation was limited by the steep slope and dense network of underlying roots. The excavation was approximately 3 feet wide.
- During excavation, the first section of the discharge pipe exiting from the bank was discovered to be perforated. Due to the perforations some potentially impacted soil was removed from beneath the pipe. However, excavation did not proceed beyond the initial section of pipe to avoid compromising the stability of the slope and the integrity of the pipe. The pipe appeared to consist of transite.
- Excavated soil was placed in polyethylene bags for transport to the top of the slope. When excavation of suspect material was completed to the extent practicable, the filled bags were placed into four 55-gallon drums with secure covers. Drums were labeled to contain "lead contaminated soil" and temporarily stored in a paved area adjacent to the facility building.

### **Sampling, Analysis and Soil Disposal**

Haley & Aldrich personnel collected two post-excavation composite soil samples. The two samples were submitted to Aquarian Analytical, Inc. for lead analyses.

- One confirmatory composite soil sample (SS-203) was collected from the bottom of the excavation. Analytical results of SS-203 indicated the presence of lead at a concentration of 600 mg/kg, which is greater than the 400 mg/kg State standard. The location of soil sample SS-203 is shown on Figure 3.

- A sample (SS-204) was collected from the drummed soil for analysis for lead by the toxicity Characteristic Leaching Procedure (TCLP) to determine disposal requirements. A lead concentration of 1.9 mg/kg was detected by the TCLP analysis.

Analytical data reports for the above samples are provided in Appendix A. Based on the low concentration of lead detected by TCLP analysis and the previous detection of low concentrations of PAHs, the excavated soil was disposed as a non-hazardous waste at the Chem Waste of Maine facility in Norridgewok, Maine.

### FINDINGS AND RECOMMENDATIONS

Based on the information contained in this report, Haley & Aldrich has the following findings and recommendations.

1. The concentration of lead (600 mg/kg) detected in the post-excavation sample (SS-203) is greater than the State standard of 400 mg/kg. However, the steep slope and root system underlying the drainage swale rendered further soil excavation impracticable. Further excavation of lead-impacted soil that appears to remain beneath the drain pipe was also impracticable due to potential impacts to stability of the slope and integrity of the pipe.
2. In telephone conversations with Mr. Spiese of VTANR and in a fax to VTANR dated 22 November 1999, Haley & Aldrich recommended that a stable cover be placed over the impacted soil in the swale to eliminate the potential for exposure by direct contact with soil containing residual lead. Our general recommendations were as follows:
  - Install a geotextile fabric on the slope that would prevent migration of soil containing residual lead; and
  - Backfill the excavation above the geotextile with crushed stone that is sufficiently coarse to remain stable on the slope.
3. VTANR responded to our fax in a letter dated 30 November 1999. In this letter, VTANR indicated that it did not object to the proposed corrective action, but reserved final judgement on the action until all information regarding work at the site is submitted to VTANR. This report contains that information.

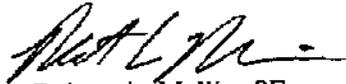
Based on VTANR's conditional approval of the proposed corrective action, Haley & Aldrich provided the following recommendations to Mr. Miller regarding backfill in the excavated portion of the swale:

- Place a geotextile fabric (Mirafi 180 or equivalent non-woven, needle-punched geotextile) on the bottom of the excavation. The purpose of the fabric is to prevent fine soil with residual lead from migrating into the overlying stone backfill.
  - Place 6 inches of crushed stone (Vermont AOT Standard 704.02B 19 mm stone (equivalent to ¾" stone)) on the fabric. This stone is intended to provide protection of the geotextile from potential puncturing by the overlying stone fill
  - Backfill the remainder of the excavation with VAOT Standard 706.04 Type II Stone Fill (i.e., 4" to 12" angular rock that is similar to rip rap). This rock should be stable on the slope. The stone fill should be placed in a manner that will flatten the slope to the extent practicable between the pipe outfall and the eastern end of the excavation.
4. In a letter dated 3 February 2000, Mr. Miller informed Haley & Aldrich that the excavation was backfilled by Guilford Excavating of Guilford, Vermont in accordance with the above recommendations on 27 December 1999. Photographs of the excavation and backfilled excavation are provided in Appendix B of this report.
  5. No further action is recommended relative to the low concentration of lead detected in water in the storm drain located northwest of the building. Closure of the floor drain connected to the storm drain in May 1999 likely eliminated the potential for lead to enter the storm drain. Parking lot runoff appears to be the sole source of water currently entering the drain. The potential for significant on- or off-site impacts related to lead detected in the drain appears low.
  6. No action is recommended relative to the low concentrations of PAHs, VOCs and TPH detected in surface soil sample S3 adjacent to the dumpster. The source of these compounds appears to be related to the presence of asphalt fragments within the soil sample.
  7. Based on the elimination of both the potential direct contact risk related to lead in the drainage swale and the potential source of lead from within the building, and the absence of evidence of environmental impacts at the site related to other contaminants, no further action appears warranted at the site. On behalf of Mr. Miller, we request that VTANR designate "Sites Management Activity Completed" status for the site.

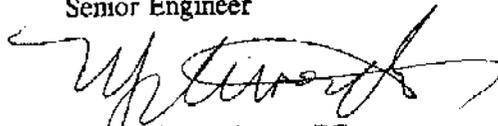
Waste Management Services  
Department of Environmental Conservation  
10 February 2000  
Page 8 of 8

We appreciate your assistance during the project and with review of this report. Please call with any questions.

Sincerely yours,  
HALEY & ALDRICH, INC.



Robert A. Mullin, PE  
Senior Engineer



Muriel S. Robinette, PG  
Vice President

Attachments:

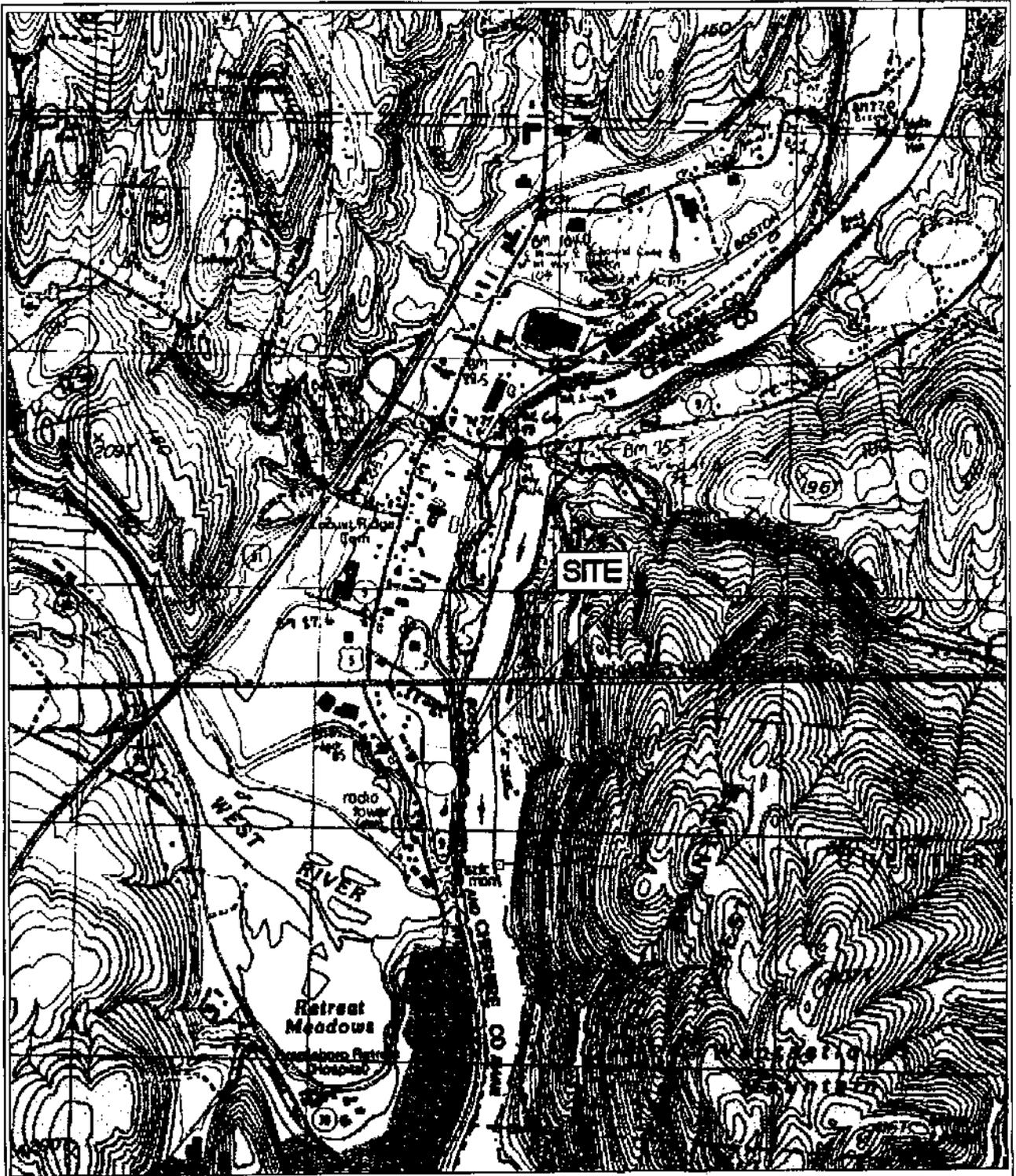
- Figure 1: Site Locus
- Figure 2: Sample locations and Analytical Results - May 1999
- Figure 3: Soil Sample and Excavation Location Plan

- Appendix A: Analytical Laboratory Reports for Soil Samples
- Appendix B: Photographs of Excavation and Backfilled Excavation

- c: Downs Rachlin & Martin, PLLC; Attn: Peter Van Oot, Esquire  
MediaNews Group; Attn: Mr. Michael Fluker  
Roger and Judith Miller

\\MAN\com\mon\60477\feb00rpt.doc





**SOURCE:**

USGS TOPOGRAPHIC MAP OF BRATTLEBORO, VT  
(PROVISIONAL EDITION 1984) AND NEWFANE, VT  
(PROVISIONAL EDITION 1984)

CONTOUR INTERVAL 6 METERS



UNDERGROUND  
ENGINEERING &  
ENVIRONMENTAL  
SOLUTIONS

WINMILL PUBLISHING CORPORATION  
BRATTLEBORO, VERMONT

**SITE LOCUS**

SCALE 1:25000

DECEMBER 1999

60477\_040 A01

**FIGURE 1**

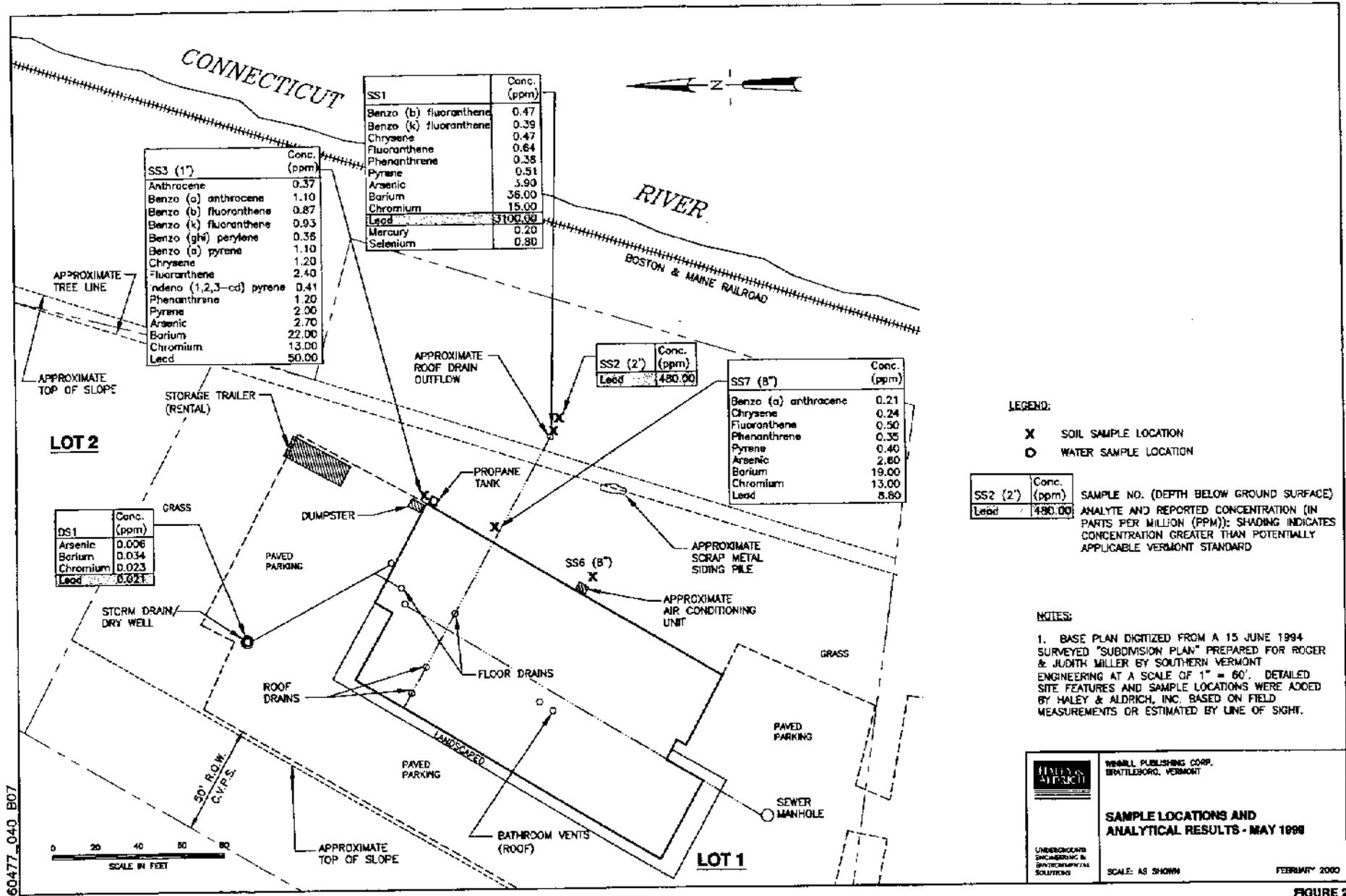


FIGURE 2

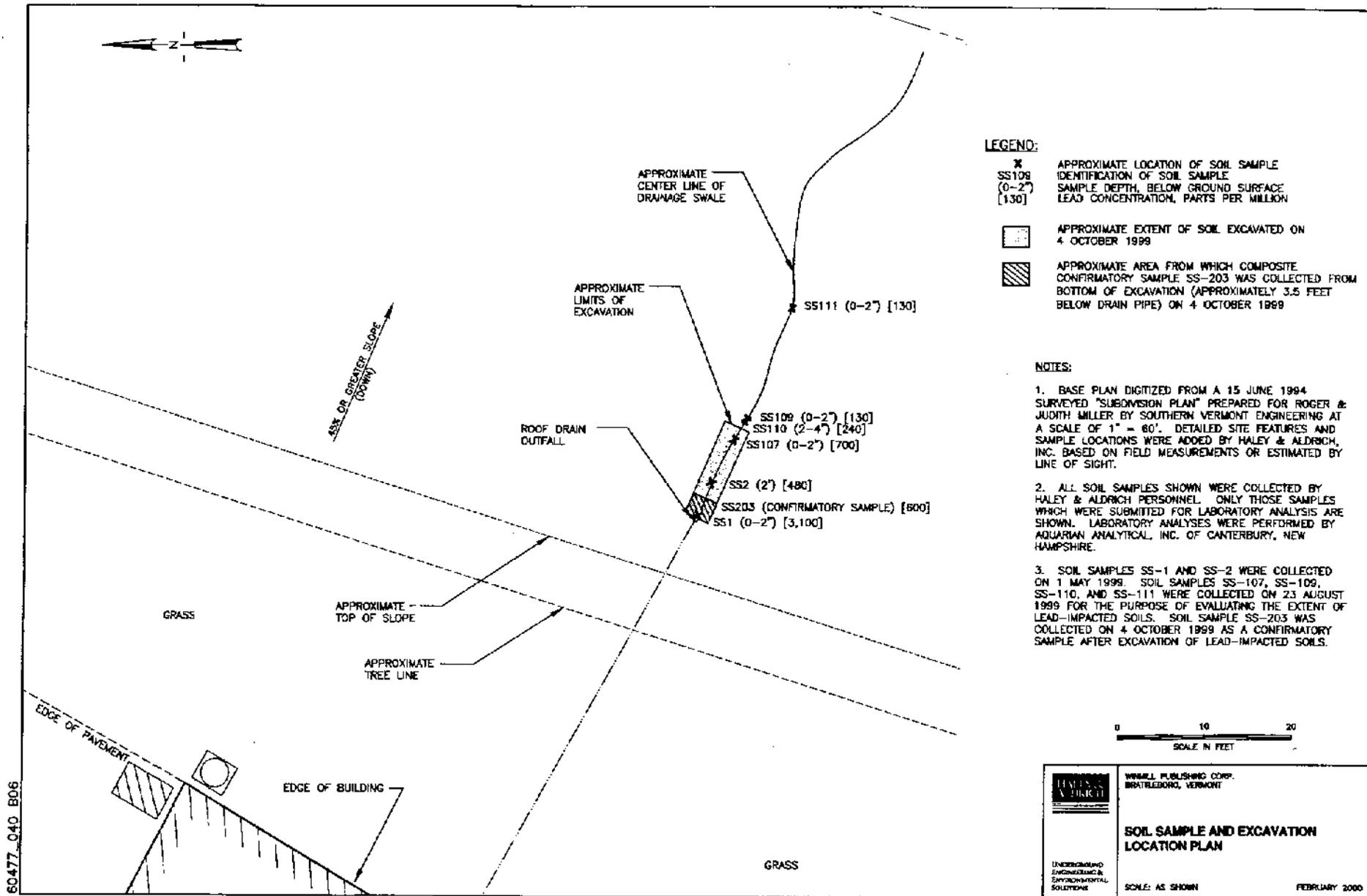


FIGURE 3

**APPENDIX A**

**Analytical Laboratory Reports for Soil Samples**





**AQUARIAN ANALYTICAL INC.**

*Laboratory Services*

P.O. Box 186

Canterbury, N.H. 03224

Ph. 603-783-9097 • Fax 603-783-0360

08-30-99, 15:07

**RECEIVED**

SEP 01 1999

HALEY & ALDRICH  
MANCHESTER

Mr. Robert Mullin  
Haley and Aldrich Inc.  
340 Granite Street  
Third Floor  
Manchester, N.H. 03102-4004

Dear Mr. Mullin:

Please find enclosed the reports, and invoice for the samples that were logged in on, 08-25-99.

AAI Sample	Date Sampled	Project Description	Sample Location
48530	08-23-99	60477-041 WINMILL PUBLISHINGSS-107	
48531	08-23-99	60477-041 WINMILL PUBLISHINGSS-109	
48532	08-23-99	60477-041 WINMILL PUBLISHINGSS-110	
48533	08-23-99	60477-041 WINMILL PUBLISHINGSS-111	

To perform these analyses, the following methods were used:

QTY. EPA Methodologies/Applications

- 4 Digestion (metals - soil)
- 4 Metals analysis (excluding mercury)

Thank you for using Aquarian Analytical Inc. on this project. If I can be of any further help, please feel free to call.

Sincerely,

William M. Rice  
Laboratory Director  
doc. L11319



**AQUARIAN ANALYTICAL INC.**

*Laboratory Services*

*P.O. Box 186*

*Canterbury, N.H. 03224*

*Ph. 603-783-9097 • Fax 603-783-0360*

08-30-99,15:07

As part of Aquarian's ongoing quality assurance program, all analyses included the following quality assurance measures.

Samples were received in an acceptable condition.

Samples were prepared and analyzed within the appropriate hold time specified in the method referred to on the analyses sheet.

The instrument that was used for the analyses was calibrated and/or tuned at the required frequency.

A daily calibration check was performed.

A daily blank was run, and contamination was not observed at levels that would affect the analyses.

For all work, internal standards, and surrogates gave appropriate response levels.

Matrix spikes were added where appropriate, and recoveries were within the acceptable range.

Duplicates were run at the frequency specified in the applicable state or federal regulations.

In addition to the above steps, all original-raw data is on file at Aquarian Analytical's offices for inspection when required.

---

Exceptions (if any)

*LMR*  
Certification

---



**AQUARIAN ANALYTICAL INC.**

*Laboratory Services*

P.O. Box 186

Canterbury, N.H. 03224

Ph. 603-783-9097 • Fax 603-783-0360

LEAD only Report

08-30-99, 15:04  
Sample 48530

Project = 60477-041 WINMILL PUBLISHING  
Date Sampled = 08-23-99, 11:30  
Date Logged In = 08-25-99, 09:52  
Date Analyzed = 08-27-99  
Person Sampling = P. LIBBY  
Location = SS-107  
Town = BRATTLEBORO                      Sample Matrix = Soil/Solid

Inorganic Test	Result mg/kg	Detection Limit mg/kg
Lead    EPA -6020	700.000	0.500

Above result is for Total Lead.

Sample Digestion EPA-3050.



**AQUARIAN ANALYTICAL INC.**

*Laboratory Services*

P.O. Box 186

Canterbury, N.H. 03224

Ph. 603-783-9097 • Fax 603-783-0360

LEAD only Report

08-30-99, 15:04  
Sample 48531

Project = 60477-041 WINMILL PUBLISHING  
Date Sampled = 08-23-99, 11:45  
Date Logged In = 08-25-99, 09:53  
Date Analyzed = 08-26-99  
Person Sampling = P. LIBBY  
Location = SS-109  
Town = BRATTLEBORO  
Sample Matrix = Soil/Solid

Inorganic Test	Result mg/kg	Detection Limit mg/kg
Lead EPA - 6020	130.000	0.500

Above result is for Total Lead.

Sample Digestion EPA-3050.



**AQUARIAN ANALYTICAL INC.**

*Laboratory Services*

P.O. Box 186

Canterbury, N.H. 03224

Ph. 603-783-9097 • Fax 603-783-0360

LEAD only Report

08-30-99, 15:04  
Sample 48532

Project = 60477-041 WINMILL PUBLISHING  
Date Sampled = 08-23-99, 11:50  
Date Logged In = 08-25-99, 09:53  
Date Analyzed = 08-26-99  
Person Sampling = P. LIBBY  
Location = SS-110  
Town = BRATTLEBORO                      Sample Matrix = Soil/Solid

Inorganic Test	Result mg/kg	Detection Limit mg/kg
Lead    EPA - 6020	240.000	0.500

Above result is for Total Lead.

Sample Digestion EPA-3050.



**AQUARIAN ANALYTICAL INC.**

Laboratory Services

P.O. Box 186

Canterbury, N.H. 03224

Ph. 603-783-9097 • Fax 603-783-0360

LEAD only Report

08-30-99, 15:04  
Sample 48533

Project = 60477-041 WINMILL PUBLISHING  
Date Sampled = 08-23-99, 12:00  
Date Logged In = 08-25-99, 09:53  
Date Analyzed = 08-26-99  
Person Sampling = P. LIBBY  
Location = SS-111  
Town = BRATTLEBORO  
Sample Matrix = Soil/Solid

Inorganic Test	Result mg/kg	Detection Limit mg/kg
Lead EPA - 6020	130.000	0.500

Above result is for Total Lead.

Sample Digestion EPA-3050.



# Laboratory Services

Conte NH (603) 783-9097  
 Phone: (603) 783-9097  
 FAX: (603) 783-0360

LABORATORY INFORMATION		PROJECT INFORMATION	
Turn-around-time: Same Day (100% upcharge)	Project #: 60477-041	Project Manager: Bob Mullin	
Turn-around-time: 24 Hrs (50% upcharge)	Project Name: <i>Wimmin Publishing</i>	Report to: <i>Bob Mullin</i>	
Turn-around-time: 48 Hrs (25% upcharge)	Town/Site: <i>Brattleboro, VT</i>	Invoice to: <i>Same</i>	
Turn-around-time: Normal <input checked="" type="checkbox"/>	Sampler: <i>PAT LIBBY</i>	Phone: <i>625-5353</i>	
Account #: <i>16000</i>	Company: <i>Haley &amp; Aldrich</i>	FAX: <i>624-8307</i>	

SAMPLE INFORMATION			METHODS										OTHER (LIST)																						
API ID#	Sample ID	Date/Time	Sample Matrix (S=soil/W=water/O=other)	Number of Containers	EPA 824.2 Drinking Water	EPA 8260 / EPA 8260B	EPA 8260B With TIC's	EPA 8240 / EPA 824	BTEX / MTBE	Chlorinated Compounds Only	EPA 8270 (A-BIN)	EPA 8270 (PAH)	EPA 8015M (Gasoline)	EPA 8100M (Fuel Oil)	Fingerprint	13 Priority Pollutant	8 RCRA	Misc.	Field Filtered	Lab Filtered	Total Lead	EPA 608/8081 PCBs or Pesticide	EPA 8160 Herbicides	EPA SW846-7 Reactivity	EPA 1010 Ignitability/Flashpoint	EPA 150.1/9045 pH	EPA 120.1 Conductivity	Alkalinity	Methane	EPA 300.0 Nitrate	EPA 300.0 Sulfate	EPA 300.0 Chloride			
48530	SS107	8/23/99 1130	S	1																															
48531	SS109	" 1145	S	1																															
48532	SS110	" 1150	S	1																															
48533	SS111	" 1200	S	1																															
Relinquished By: <i>P. Libby</i>	Date: <i>8/25/99</i>	Time: <i>0750</i>	Received By: <i>[Signature]</i>	Notes:																															
Relinquished By:	Date:	Time:	Received By:																																
Relinquished By:	Date:	Time:	Received By:																																

Please refer to back side for sampling guidelines.



**AQUARIAN ANALYTICAL INC.**

*Laboratory Services*

P.O. Box 186

Canterbury, N.H. 03224

Ph. 603-783-9097 • Fax 603-783-0360  
10-08-99, 11:27

Mr. Robert Mullin  
Haley and Aldrich Inc.  
340 Granite Street  
Third Floor  
Manchester, N.H. 03102-4004

Dear Mr. Mullin:

Please find enclosed the reports, and invoice for the samples  
that were logged in on, 10-07-99.

AAI Sample	Date Sampled	Project Description	Sample Location
49207	10-04-99	60477-041 WINMILL PUBLISHING	SS-203

To perform these analyses, the following methods were used:

QTY. EPA Methodologies/Applications

- 1 Soil/Solid Digestion
- 1 Metals analysis (excluding mercury)

Thank you for using Aquarian Analytical Inc. on this project.  
If I can be of any further help, please feel free to call.

Sincerely,

*William M. Rice*  
William M. Rice  
Laboratory Director  
doc. L11509

**RECEIVED**

OCT 13 1999

HALEY & ALDRICH  
MANCHESTER



AQUARIAN ANALYTICAL INC.

*Laboratory Services*

*P.O. Box 186*

*Canterbury, N.H. 03224*

*Ph. 603-783-9097 • Fax 603-783-0360*

10-08-99, 11:27

As part of Aquarian's ongoing quality assurance program, all analyses included the following quality assurance measures.

Samples were received in an acceptable condition.

Samples were prepared and analyzed within the appropriate hold time specified in the method referred to on the analyses sheet.

The instrument that was used for the analyses was calibrated and/or tuned at the required frequency.

A daily calibration check was performed.

A daily blank was run, and contamination was not observed at levels that would affect the analyses.

For all work, internal standards, and surrogates gave appropriate response levels.

Matrix spikes were added where appropriate, and recoveries were within the acceptable range.

Duplicates were run at the frequency specified in the applicable state or federal regulations.

In addition to the above steps, all original-raw data is on file at Aquarian Analytical's offices for inspection when required.

---

Exceptions (if any)

  
\_\_\_\_\_  
Certification



**AQUARIAN ANALYTICAL INC.**

*Laboratory Services*

P.O. Box 186

Canterbury, N.H. 03224

Ph. 603-783-9097 • Fax 603-783-0360

LEAD only Report

10-08-99, 12:02  
Sample 49207

Project = 60477-041 WINMILL PUBLISHING  
Date Sampled = 10-04-99, 16:00  
Date Logged In = 10-07-99, 11:07  
Date Analyzed = 10-07-99  
Person Sampling = P. LIBBY  
Location = SS-203  
Town = BRATTLEBORO      Sample Matrix = Soil/Solid

Inorganic Test	Result mg/kg	Detection Limit mg/kg
Lead    EPA - 6020	600.000	0.500

Above result is for Total Lead.

Sample Digestion EPA-3050.



**AQUARIAN ANALYTICAL INC.**

*Laboratory Services*

P.O. Box 186

Canterbury, N.H. 03224

Ph. 603-783-9097 • Fax 603-783-0360

10-07-99, 12:41

**RECEIVED**

OCT 08 1999

HALEY & ALDRICH  
MANCHESTER

Mr. Robert Mullin  
Haley and Aldrich Inc.  
340 Granite Street  
Third Floor  
Manchester, N.H. 03102-4004

Dear Mr. Mullin:

Please find enclosed the reports, and invoice for the samples that were logged in on, 10-05-99.

AAI Sample	Date Sampled	Project Description	Sample Location
49167	10-04-99	60477.041 WINMILL PUBLISHINGSS-204	

To perform these analyses, the following methods were used:

QTY. EPA Methodologies/Applications

- 1 TCLP Extraction EPA-1311 inorganics
- 1 Metals analysis (excluding mercury)

Thank you for using Aquarian Analytical Inc. on this project. If I can be of any further help, please feel free to call.

Sincerely,

*William M. Rice*  
William M. Rice  
Laboratory Director  
doc. L11495



AQUARIAN ANALYTICAL INC.

*Laboratory Services*

*P.O. Box 186*

*Canterbury, N.H. 03224*

*Ph. 603-783-9097 • Fax 603-783-0360*

10-07-99,12:41

As part of Aquarian's ongoing quality assurance program, all analyses included the following quality assurance measures.

Samples were received in an acceptable condition.

Samples were prepared and analyzed within the appropriate hold time specified in the method referred to on the analyses sheet.

The instrument that was used for the analyses was calibrated and/or tuned at the required frequency.

A daily calibration check was performed.

A daily blank was run, and contamination was not observed at levels that would affect the analyses.

For all work, internal standards, and surrogates gave appropriate response levels.

Matrix spikes were added where appropriate, and recoveries were within the acceptable range.

Duplicates were run at the frequency specified in the applicable state or federal regulations.

In addition to the above steps, all original raw data is on file at Aquarian Analytical's offices for inspection when required.

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Exceptions (if any)

UMR  
Certification



**AQUARIAN ANALYTICAL INC.**

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TCLP Report

10-07-99, 12:40

Sample 49167

Sample Matrix = Soil/Solid      Project = 60477.041 WINMILL PUBLISHING  
Date Sampled = 10-04-99, 15:20      Sampler = P. LIBBY  
Date Logged In = 10-05-99, 09:16      Location = SS-204  
Date of Analysis = 10-06-99      Town = BRATTLEBORO

TCLP Metal	EPA method	Result (ppm-mg/L)	Det. Lim. (ppm-mg/L)
Lead	6020	1.9000	0.0100

Comments:

Results expressed in milligrams/liter, (ppm)  
TCLP Extraction Method = EPA-1311



**RUSH!**

24 HOURS

# AQUARIAN ANALYTICAL, INC.

## Laboratory Services

150 New Road  
Canterbury, NH 03324  
Phone: (603)783-8087  
FAX: (603)783-0380

603 783 0360

Turn-around-time: RUSH **X** 24 HR  
Turn-around-time: Normal \_\_\_\_\_  
Account #: 16000

Project #: 60477-041  
Project Name: Winnill Publishing  
Town/Site: Brattleboro, VT  
Sampler: Pat Libby  
Company: Haley & Aldrich

Project Manager: Robert Mullin  
Report to: Robert Mullin  
Invoice to: Robert Mullin  
Phone: 603 625 5363  
FAX: 603 624 8307

AQUARIAN ANALYTICAL

NOV 11 11:22 AM '99  
TOTAL PAGE: 002

AAI ID#	Sample ID	Date/Time	Sample Matrix (S-soil / W-water / O-others)	Number of Containers	EPA 524.2 Drinking Water	EPA 8280	EPA 8240	EPA 824	BTEX / MTBE	EPA 8270 (A-BV)	EPA 8270 (PAH)	EPA 8015M (Gasoline)	EPA 8100M (Fuel Oil)	Fingerprint	13 PP Water (Disa) Total	13 PP Soil (TCLP) Total	8 RCRA Water (Disa) Total	8 RCRA Soil (TCLP) Total	Miscellaneous-List Total Lead	EPA 809000 Pesticides/PCBS	EPA 8160 Herbicides	EPA 8160-7 Reactivity	EPA 1616 Ignitability/Flashpoint	EPA 10046 pH	EPA 120.1 Conductivity
49207	SS204	10/1/99 1600	S																	X					

Should be  
SS203  
please amend the  
report & container label

Date: 10/1/99  
Time: 10:05  
Date:  
Time:  
Date:  
Time:

Received By:  
*Alan D. Nelson*  
Received By:  
Received By:

Notes:

PAGE: 003

0920 894 839

OCT 8 '99 11:48 FR HA MANCHESTER

603 624 8307 TO 7830360

42:11 66.8 100