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received
MAG 9/10/20

May 29, 2009
Ref.# 090304

US Environmental Protection Agency Region I
Shelly Puleo
Industrial NPDES Permit (CIP)
1 Congress Street, Suite 1100
Boston, MA 02114-2023

Re: Remediation General Permit – Notice of Intent
Construction Excavation Dewatering – CVS Building
74-76 Swan Street, Methuen, MA 01844
MassDEP RTN's 3-28473, 3-25960, 3-26286

Dear Shelly Puleo:

On behalf of the Jackson & Swan Redevelopment LLC, Simmons Environmental Services, Inc. (SIMMONS) has prepared the following Notice of Intent of a Remediation General Permit (RGP) to begin operation of a dewatering system for installation of building foundation at 74-76 Swan Street in Methuen, MA. Based upon the need for dewatering of this area to install the building foundation as discussed in further detail herein, the subject discharge for this RGP should be classified as Category I (Petroleum Related Site Remediation), Subcategory C (Petroleum Site Containing Other Contaminants) and Category III (Contaminated Construction Dewatering), Subcategory A (General "Urban Fill" Sites). This RGP is being requested to allow for the dewatering to discharge to the adjacent storm drain system.

Background

The property is owned by Jackson & Swan Redevelopment LLC. The property was previously operated as a gasoline service station since the 1930's and a restaurant between the 1940's and 1980's. Between the early and mid 1900's the property grade was periodically raised with 5 to 9 feet of urban fill. Contaminants detected at the property that exceeded MassDEP standards consisted of lead in soil from the urban fill and petroleum in soil and groundwater from the former gasoline and fuel oil USTs and hydraulic lifts. The MassDEP was notified of each release under Release Tracking Number (RTN) 3-28473 for lead in soil and RTNs 3-25690 and 3-26286 for petroleum in soil and groundwater. The area where the building foundation is being installed is outside and upgradient of the petroleum impacted areas but within the area where lead was detected in soil. Although lead has not been detected in groundwater, this application is being submitted as a precaution if any of these contaminants are present in the dewatering activity. The property layout is shown in the enclosed Dewatering Site Plan (Figure 2).

The Town of Methuen will be contacted to determine if this dewatering activity and discharge to the storm drain system requires a separate application submittal for a Notice of Intent or Negative Determination of Applicability.



Treatment System

As shown in the Dewatering Site Plan (Figure 2) and Process Flow Diagram (Figure 3), groundwater will be pumped from the foundation excavation area into a fractionalization tank, then through a bag filter and carbon treatment, and then pumped out to the storm drain system that leads to the Spickett River.

Exceedance of any EPA water samples limits is not expected. However, groundwater discharged from the fractionation tank to the storm drain system after treatment will be monitored and sampled to confirm that there is no reasonable potential for exceedance of the Appendix III limits.

ACEC and NHESP Habitats

According to review of the Massachusetts Geographic Information System (GIS) Site Scoring Map, the Spickett River is not part of the National Heritage Endangered Species Program (NHESP) habitat or Area of Critical Environmental Concern (ACEC). As shown in the NHESP list for the City of Lawrence, there are some rare species applicable to the town but not related to the Spickett River.

Taxonomic Group	Scientific Name	Common Name	MESA Status	Date
Beetle	<i>Cicindela purpurea</i>	Purple Tiger Beetle	SC	1923
Bird	<i>Falco peregrinus</i>	Peregrine Falcon	E	2006
Mussel	<i>Alasmidonta varicosa</i>	Brook Floater (Swollen Wedgemussel)	E	Historic
Vascular Plant	<i>Bolboschoenus fluviatilis</i>	River Bulrush	SC	1877
Vascular Plant	<i>Carex typhina</i>	Cat-tail Sedge	T	1879
Vascular Plant	<i>Gentiana andrewsii</i>	Andrews' Bottle Gentian	E	1885
Vascular Plant	<i>Juncus filiformis</i>	Thread Rush	E	1903
Vascular Plant	<i>Ranunculus pensylvanicus</i>	Bristly Buttercup	SC	1879
Vascular Plant	<i>Sabatia kennedyana</i>	Plymouth Gentian	SC	2006

Because the area of dewatering is related to MassDEP disposal site Release Tracking Number (RTN) 3-28473 and covered under the Massachusetts Contingency Plan (MCP) codified as 310 CMR 40.0000, then there is no need to apply to the state for coverage under BRP WM 12 (Remediation & Miscellaneous Contaminated Sites General Permit) and no fee to the MassDEP Division of Watershed Management is required.



If you have any questions concerning the above-mentioned information, please do not hesitate to call.

Stephan H. Landry

Stephan H. Landry
Hydrogeologist

William A. Simmons

William A. Simmons, LSP, J.D.

cc:

Louis P. Minicucci Jr.

Attachments:

Form for Notice of Intent for General Remediation Permit
Figure 1 – Site Locus Map (USGS Quadrangle)
Figure 2 – Dewatering Site Plan
Figure 3 – Process Flow Diagram
Lab Data Summary Tables
Laboratory Reports

213 Elm Street
Salisbury, MA 01952
Tel: 978-463-6669

B. Suggested Form for Notice of Intent (NOI) for the Remediation General Permit

1. General site information. Please provide the following information about the site:

a) Name of facility/site: Jackson & Swan Redevelopment LLC		Facility/site address: 74-76 Swan Street	
Location of facility/site: longitude: 71o09'30" _ latitude: _42o43'10" _	Facility SIC code(s):	Street: 74-76 Swan Street	
b) Name of facility/site owner: Jackson & Swan Redevelopment LLC		Town: Methuen	
Email address of owner: lpm@mincocorp.com	State: MA	Zip: 01844	County:
Telephone no. of facility/site owner: 978-499-9700			
Fax no. of facility/site owner: 978-499-2187		Owner is (check one): 1. Federal ___ 2. State/Tribal ___	
Address of owner (if different from site): Jackson & Swan Redevelopment LLC		3. Private ☒ 4. other, if so, describe:	
Street: 231 Sutton Street, Suite 1B			
Town: North Andover	State: MA	Zip: 01845	County: Essex
c) Legal name of operator:	Operator telephone no: 978-499-9700		
Jackson & Swan Redevelopment LLC	Operator fax no.: 978-499-2187		Operator email: nbpt@mir
Operator contact name and title: Louis P. Minicucci Jr.			
Address of operator (if different from owner):	Street:		
Town:	State:	Zip:	County:
d) Check "yes" or "no" for the following:			
1. Has a prior NPDES permit exclusion been granted for the discharge? Yes ___ No ☒ , if "yes," number:			
2. Has a prior NPDES application (Form 1 & 2C) ever been filed for the discharge? Yes ___ No ☒ , if "yes," date and tracking #:			
3. Is the discharge a "new discharge" as defined by 40 CFR 122.2? Yes ___ No ☒			
4. For sites in Massachusetts, is the discharge covered under the MA Contingency Plan (MCP) and exempt from state permitting? Yes ☒ No ___			

e) Is site/facility subject to any State permitting or other action which is causing the generation of discharge? Yes ☐ No ☒ If "yes," please list: 1. site identification # assigned by the state of NH or MA: 2. permit or license # assigned: 3. state agency contact information: name, location, and telephone number:	f) Is the site/facility covered by any other EPA permit, including: 1. multi-sector storm water general permit? Y ☐ N ☒ if Y, number: 2. phase I or II construction storm water general permit? Y ☒ N ☐ if Y, number: MAR10D438 3. individual NPDES permit? Y ☐ N ☒ if Y, number: 4. any other water quality related permit? Y ☐ N ☒ if Y, number:
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2. Discharge information. Please provide information about the discharge, (attaching additional sheets as needed) including:

a) Describe the discharge activities for which the owner/applicant is seeking coverage:
Groundwater nearby the foundation dewatering area has been impacted by releases of petroleum (gasoline, fuel oil, hydraulic oil). Although lead has not been detected in groundwater, concentrations of lead are found in soil within the groundwater table. Groundwater from dewatering activities will be pumped through a carbon filter system to remove any potential migration and discharged to a storm drain culvert that leads to the Spickett River 3/4 mile to the south.

b) Provide the following information about each discharge:	1) Number of discharge points: 1	2) What is the maximum and average flow rate of discharge (in cubic feet per second, ft ³ /s)? Max. flow 0.0896 Average flow 0.0448 Is maximum flow a design value ? Y ☐ N ☒ For average flow, include the units and appropriate notation if this value is a design value or estimate if not available.
3) Latitude and longitude of each discharge within 100 feet: pt.1: long. 7100930' lat. 4204310' ; pt.2: long. lat. ; pt.3: long. lat. ; pt.4: long. lat. ; pt.5: long. lat. ; pt.6: long. lat. ; pt.7: long. lat. ; pt.8: long. lat. ; etc.		
4) If hydrostatic testing, total volume of the discharge (gals):		5) Is the discharge intermittent ☒ or seasonal ☐ Is discharge ongoing Yes ☒ No ☐
c) Expected dates of discharge (mm/dd/yy): start 05/31/09 end 07/30/09		
d) Please attach a line drawing or flow schematic showing water flow through the facility including: 1. sources of intake water, 2. contributing flow from the operation, 3. treatment units, and 4. discharge points and receiving waters(s).		

3. Contaminant information. In order to complete this section, the applicant will need to take a minimum of one sample of the untreated water and have it analyzed for all of the parameters listed in Appendix III. Historical data, (i.e., data taken no more than 2 years prior to the effective date of the permit) may be used if obtained pursuant to: i. Massachusetts' regulations 310 CMR 40.0000, the Massachusetts Contingency Plan ("Chapter 21E"); ii. New Hampshire's Title 50 RSA 485-A: Water Pollution and Waste Disposal or Title 50 RSA 485-C: Groundwater Protection Act; or iii. an EPA permit exclusion letter issued pursuant to 40 CFR 122.3, provided the data was analyzed with test methods that meet the requirements of this permit. Otherwise, a new sample shall be taken and analyzed.

a) Based on the analysis of the sample(s) of the untreated influent, the applicant must check the box of the sub-categories that the potential discharge falls within.

Gasoline Only	VOC Only	Primarily Metals	Urban Fill Sites	Contaminated Sumps	Mixed Contaminants	Aquifer Testing
Fuel Oils (and Other Oils) only	VOC with Other Contaminants	Petroleum with Other Contaminants	Listed Contaminated Sites	Contaminated Dredge Condensates	Hydrostatic Testing of Pipelines/Tanks	Well Development or Rehabilitation

b) Based on the analysis of the untreated influent, the applicant must indicate whether each listed chemical is **believed present** or **believed absent** in the potential discharge. Attach additional sheets as needed.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
1. Total Suspended Solids		✓		Grab	2540	10 mg/L	unknown		unknown	
2. Total Residual Chlorine	✓									
3. Total Petroleum Hydrocarbons		✓		Grab	1664	5 mg/L	14,300		14,300	
4. Cyanide	✓									
5. Benzene	✓			Grab	8260	5 ug/L	<5		<5	
6. Toluene		✓		Grab	8260	5 ug/L	13.1		13.1	
7. Ethylbenzene	✓			Grab	8260	5 ug/L	<5		<5	
8. (m,p,o) Xylenes		✓		Grab	8260	5 ug/L	<15		<15	
9. Total BTX ⁴		✓		Grab	8260	100 ug/L	<35		<35	

⁴ BTX = Sum of Benzene, Toluene, Ethylbenzene, total Xylenes.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
10. Ethylene Dibromide ⁵ (1,2- Dibromo-methane)	✓									
11. Methyl-tert-Butyl Ether (MtBE)		✓			8260	70 ug/L	51.3		51.3	
12. tert-Butyl Alcohol (TBA)	✓									
13. tert-Amyl Methyl Ether (TAME)	✓									
14. Naphthalene		✓			8260	20 ug/L	58.3		58.3	
15. Carbon Tetra-chloride	✓									
16. 1,4 Dichlorobenzene	✓									
17. 1,2 Dichlorobenzene	✓									
18. 1,3 Dichlorobenzene	✓									
19. 1,1 Dichloroethane	✓									
20. 1,2 Dichloroethane	✓									
21. 1,1 Dichloroethylene	✓									
22. cis-1,2 Dichloro-ethylene	✓									
23. Dichloromethane (Methylene Chloride)	✓									
24. Tetrachloroethylene	✓									

⁵ EDB is a groundwater contaminant at fuel spill and pesticide application sites in New England.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily Value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
25. 1,1,1 Trichloroethane	✓									
26. 1,1,2 Trichloroethane	✓									
27. Trichloroethylene	✓									
28. Vinyl Chloride	✓									
29. Acetone	✓									
30. 1,4 Dioxane	✓									
31. Total Phenols	✓									
32. Pentachlorophenol	✓									
33. Total Phthalates ⁶ (Phthalate esters)	✓									
34. Bis (2-Ethylhexyl) Phthalate [Di-(ethylhexyl) Phthalate]	✓									
35. Total Group I Polycyclic Aromatic Hydrocarbons (PAH)	✓									
a. Benzo(a) Anthracene	✓									
b. Benzo(a) Pyrene	✓									
c. Benzo(b)Fluoranthene	✓									
d. Benzo(k) Fluoranthene	✓									
e. Chrysene	✓									

⁶ The sum of individual phthalate compounds.

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Average daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
f. Dibenzo(a,h) anthracene	✓									
g. Indeno(1,2,3-cd) Pyrene	✓									
36. Total Group II Polycyclic Aromatic Hydrocarbons (PAH)	✓									
h. Acenaphthene	✓									
i. Acenaphthylene	✓									
j. Anthracene	✓									
k. Benzo(ghi) Perylene	✓									
l. Fluoranthene	✓									
m. Fluorene	✓									
n. Naphthalene-	✓									
o. Phenanthrene	✓									
p. Pyrene	✓									
37. Total Polychlorinated Biphenyls (PCBs)	✓									
38. Antimony	✓									
39. Arsenic	✓									
40. Cadmium	✓									
41. Chromium III	✓									
42. Chromium VI	✓									

PARAMETER	Believe Absent	Believe Present	# of Samples (1 minimum)	Type of Sample (e.g., grab)	Analytical Method Used (method #)	Minimum Level (ML) of Test Method	Maximum daily value		Avg. daily value	
							concentration (ug/l)	mass (kg)	concentration (ug/l)	mass (kg)
43. Copper	✓									
44. Lead		✓		Grab	7421	0.5 mg/L	<2.5		<2.5	
45. Mercury	✓			Grab						
46. Nickel	✓			Grab						
47. Selenium	✓			Grab						
48. Silver	✓			Grab						
49. Zinc	✓			Grab						
50. Iron	✓			Grab						
Other (describe):										

c) For discharges where metals are believed present, please fill out the following:

<i>Step 1:</i> Do any of the metals in the influent have a reasonable potential to exceed the effluent limits in Appendix III (i.e., the limits set at zero to five dilutions)? Y ___ N ☒	If yes, which metals?
<i>Step 2:</i> For any metals which have reasonable potential to exceed the Appendix III limits, calculate the dilution factor (DF) using the formula in Part I.A.3.c) (step 2) of the NOI instructions or as determined by the State prior to the submission of this NOI. What is the dilution factor for applicable metals? Metals: _____ DF: _____	Look up the limit calculated at the corresponding dilution factor in Appendix IV. Do any of the metals in the influent have the potential to exceed the corresponding effluent limits in Appendix IV (i.e., is the influent concentration above the limit set at the calculated dilution factor)? Y ___ N ☒ If "Yes," list which metals:

4. Treatment system information. Please describe the treatment system using separate sheets as necessary, including:

a) A description of the treatment system, including a schematic of the proposed or existing treatment system: Dewatering water is discharged to a fractionation tank					
b) Identify each applicable treatment unit (check all that apply):	Frac. tank ☒	Air stripper	Oil/water separator	Equalization tanks	Bag filter ☒ GAC filter ☒
	Chlorination	Dechlorination	Other (please describe):		
c) Proposed average and maximum flow rates (gallons per minute) for the discharge and the design flow rate(s) (gallons per minute) of the treatment system: Average flow rate of discharge <u>20</u> Maximum flow rate of treatment system <u>40</u> Design flow rate of treatment system _____					
d) A description of chemical additives being used or planned to be used (attach MSDS sheets): <u>None</u>					

5. Receiving surface water(s). Please provide information about the receiving water(s), using separate sheets as necessary:

a) Identify the discharge pathway:	Direct _____	Within facility _____	Storm drain ☒	River/brook ☒	Wetlands _____	Other (describe): _____
b) Provide a narrative description of the discharge pathway, including the name(s) of the receiving waters: Storm drain system of Methuen discharges to Spickett River in Lawrence						
c) Attach a detailed map(s) indicating the site location and location of the outfall to the receiving water: 1. For multiple discharges, number the discharges sequentially. 2. For indirect discharges, indicate the location of the discharge to the indirect conveyance and the discharge to surface water The map should also include the location and distance to the nearest sanitary sewer as well as the locus of nearby sensitive receptors (based on USGS topographical mapping), such as surface waters, drinking water supplies, and wetland areas.						
d) Provide the state water quality classification of the receiving water <u>Category 5</u>						
e) Provide the reported or calculated seven day-ten year low flow (7Q10) of the receiving water <u>Not known</u> cfs Please attach any calculation sheets used to support stream flow and dilution calculations.						
f) Is the receiving water a listed 303(d) water quality impaired or limited water? Yes ☒ No _____ If yes, for which pollutant(s)? Metals, Nutrients, Pathogens Is there a TMDL? Yes _____ No ☒ If yes, for which pollutant(s)? Segment ID MA84A-10_2008						

6. Results of Consultation with Federal Services: Please provide the following information according to requirements of Part 1.B.4 and Appendices II and VII.

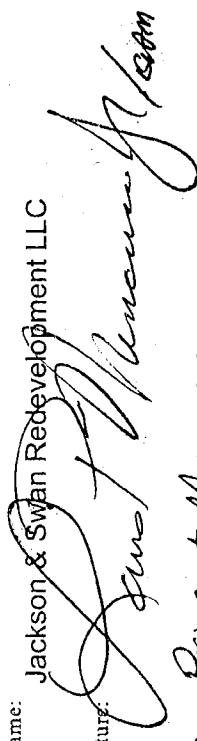
a) Are any listed threatened or endangered species, or designated critical habitat, in proximity to the discharge? Yes ☒ No ☒
Has any consultation with the federal services been completed? Yes ☒ No ☐ or is consultation underway? Yes ☐ No ☐
What were the results of the consultation with the U.S. Fish and Wildlife Service and/or National Marine Fisheries Service (check one): a "no jeopardy" opinion? ☒ or written concurrence ☐ on a finding that the discharges are not likely to adversely affect any endangered species or critical habitat?
b) Are any historic properties listed or eligible for listing on the National Register of Historic Places located on the facility or site or in proximity to the discharge? Yes ☐ No ☒ Have any state or tribal historic preservation officer been consulted in this determination (Massachusetts only)? Yes ☐ No ☒

7. Supplemental information :

Please provide any supplemental information. Attach any analytical data used to support the application. Attach any certification(s) required by the general permit.

8. Signature Requirements: The Notice of Intent must be signed by the operator in accordance with the signatory requirements of 40 CFR Section 122.22, including the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Facility/Site Name:	Jackson & Swan Redevelopment LLC
Operator signature:	
Title:	Manager Project Manager
Date:	

Manager

042° 43' 00.00" N

042° 44' 00.00" N

042° 45' 00.00" N

071° 11' 00.00" W

071° 10' 00.00" W

071° 09' 00.00" W

071° 08' 00.00" W

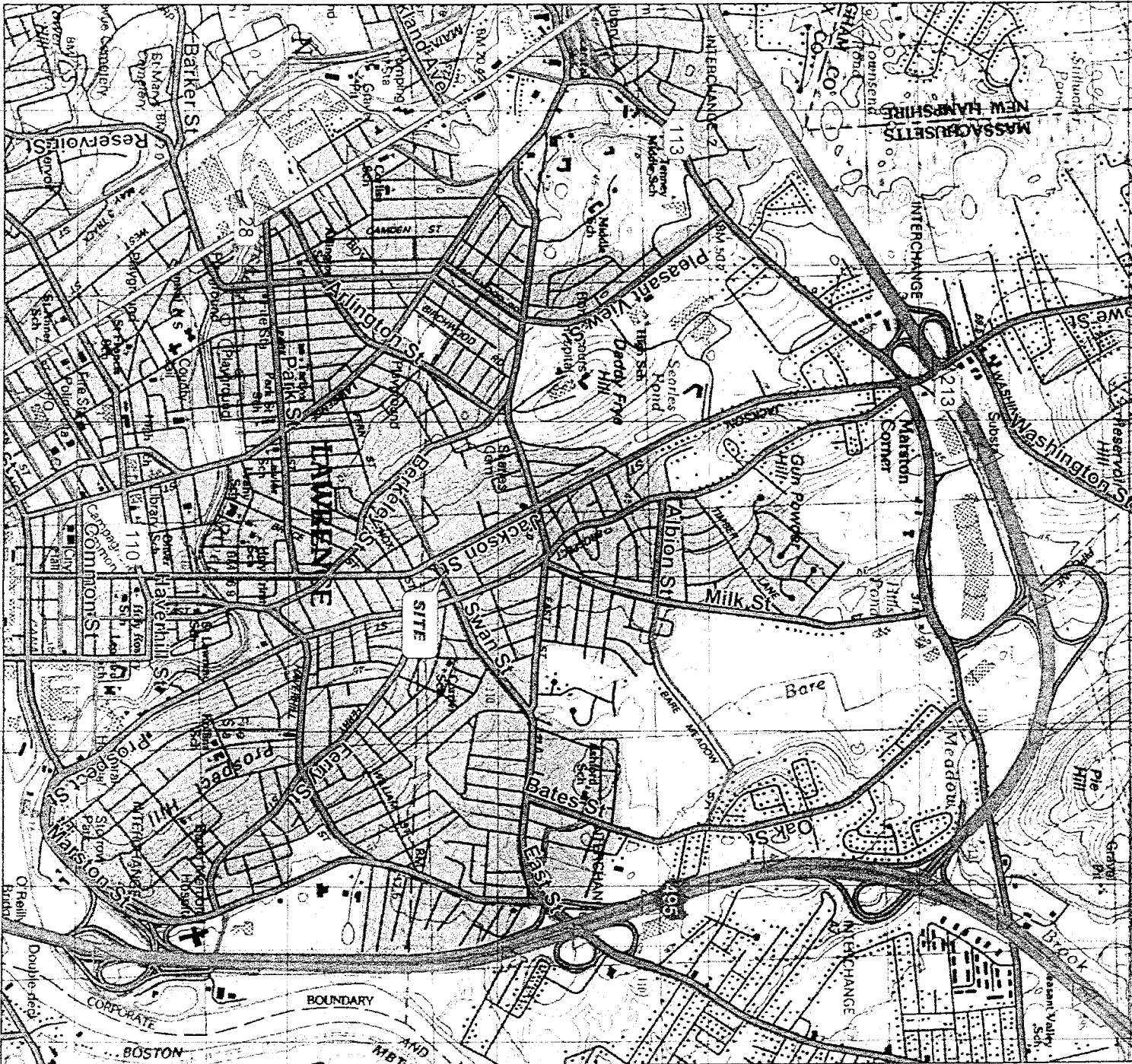
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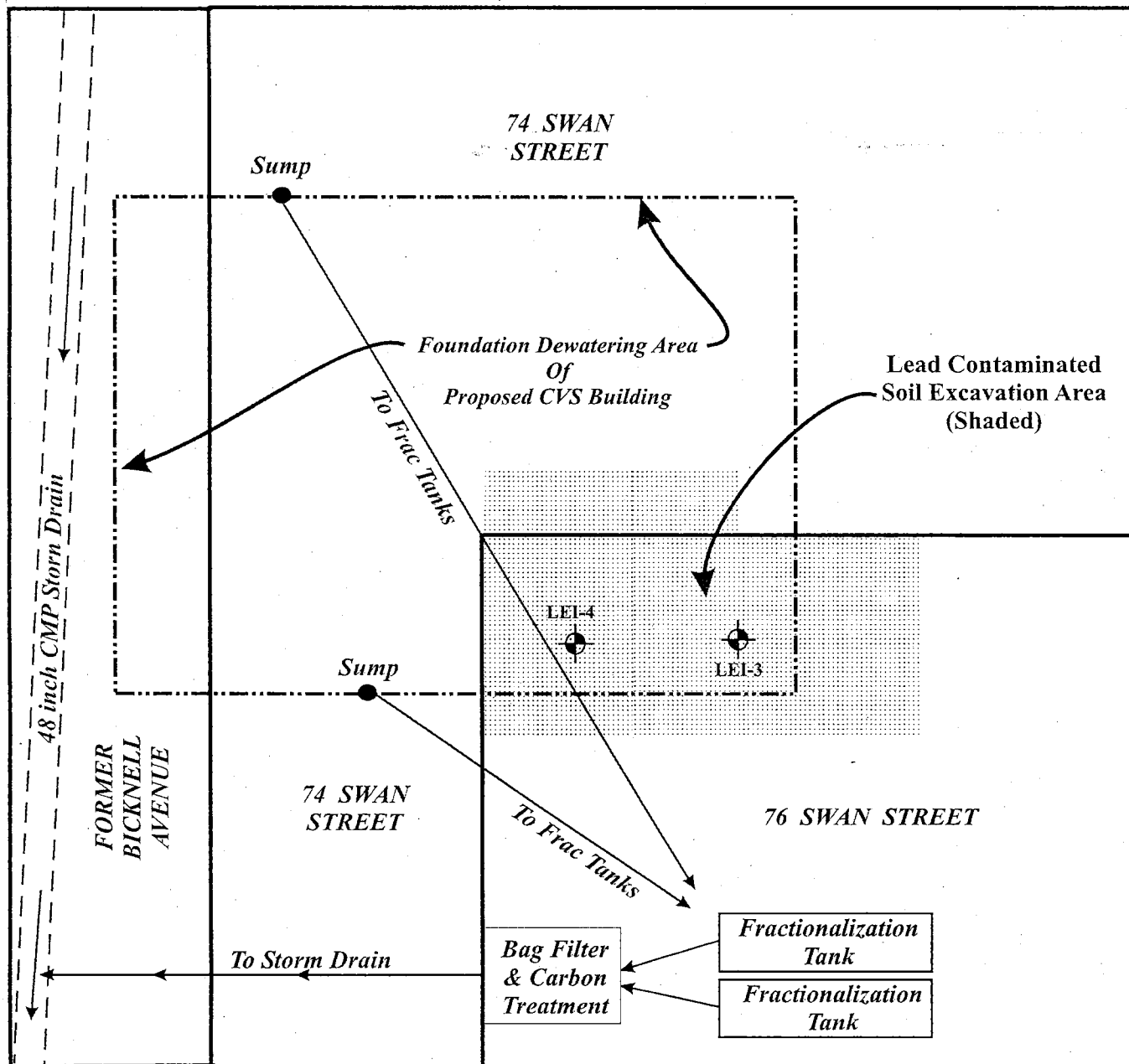
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042° 45' 00.00" N

Datum: NAD27

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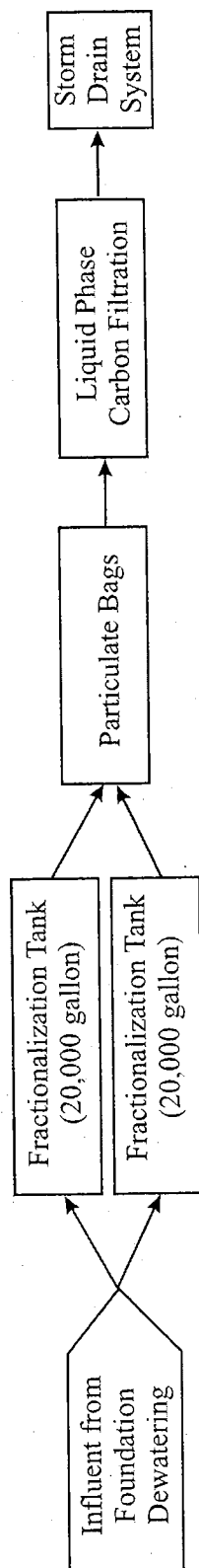
To Methuen and Lawrence
Storm Drain System
and Spickett River

SWAN

STREET

ADELAIDE AVENUE

FIGURE 3
PROCESS FLOW DIAGRAM
CONSTRUCTION DEWATERING SYSTEM



74-76 SWAN STREET, METHUEN, MA
Prepared By:
 SIMMONS ENVIRONMENTAL SERVICES, INC.
 213 Elm Street, Salisbury, MA 01952
 (978) 463-6669

Date: May 2009
 Project #: 090304
 Drafted: SHL

Table 3
Groundwater Analytical Data - Petroleum Constituents
76 Swan Street
Methuen, Massachusetts

Species	No. Annual Capture	Sex										Total
		Male	Female	Immature	Adult	Subadult	Young	Old	Very Old	Very Old	Very Old	
1. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
2. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
3. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
4. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
5. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
6. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
7. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
8. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
9. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
10. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
11. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
12. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
13. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
14. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
15. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
16. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
17. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
18. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
19. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
20. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
21. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
22. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
23. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
24. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
25. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
26. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
27. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
28. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
29. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
30. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
31. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
32. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
33. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
34. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
35. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
36. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
37. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
38. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
39. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
40. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
41. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
42. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
43. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
44. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
45. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
46. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
47. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
48. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
49. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
50. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
51. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
52. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
53. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
54. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
55. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
56. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
57. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
58. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
59. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
60. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
61. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
62. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
63. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
64. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
65. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
66. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
67. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
68. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
69. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
70. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
71. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
72. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
73. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
74. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
75. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
76. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
77. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
78. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
79. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
80. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
81. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
82. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
83. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
84. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
85. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
86. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
87. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
88. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
89. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
90. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
91. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
92. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
93. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
94. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
95. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
96. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
97. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
98. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
99. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200	200	2,000
100. <i>Chrysomitris tristis</i>	1,000	200	200	200	200	200	200	200	200	200		



SPECTRUM ANALYTICAL, INC.

Featuring

HANIBAL TECHNOLOGY

Laboratory Report

☒ Final Report

Report Date:
09-Sep-05 16:54

Lessard Environmental, Inc.
30 B Cherry Hill Drive
Danvers, MA 01923
Attn: Marc Brochu

Project: Richdale Gas Station-Methuen, MA
Project #: 1694

Laboratory ID	Client Sample ID	Matrix	Date Sampled	Date Received
SA33697-01	LEI-1	Ground Water	06-Sep-05 13:30	07-Sep-05 17:10
SA33697-02	LEI-2	Ground Water	06-Sep-05 13:40	07-Sep-05 17:10
SA33697-03	LEI-3	Ground Water	06-Sep-05 13:10	07-Sep-05 17:10
SA33697-04	LEI-4	Ground Water	06-Sep-05 12:55	07-Sep-05 17:10
SA33697-05	LEI-5	Ground Water	06-Sep-05 11:15	07-Sep-05 17:10

I attest that the information contained within the report has been reviewed for accuracy and checked against the quality control requirements for each method. All applicable NELAC requirements have been met.
Please note that this report contains 19 pages of analytical data including Chain of Custody document(s).
This report may not be reproduced, except in full, without written approval from Spectrum Analytical, Inc.

Authorized by:

Massachusetts Certification # M-MA138/MA1110
Connecticut # PH-0777
Florida # E87600/E87936
Maine # MA138
New Hampshire # 2538/2972
New York # 11393/11840
Rhode Island # 98
USDA # S-51435
Vermont # VT-11393



[Signature]

Hanibal C. Tayeh, Ph.D.
President/Laboratory Director

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CASE NARRATIVE:

The data set for work order SA33697 complies with internal QC criteria for the methods performed. The samples were received @ 4.0 degrees Celsius. An infrared thermometer with a tolerance of +/- 2.0 degrees Celsius was used immediately upon receipt of the samples.

...has published a list of analytical methods (CAM) which provides a series of recommended protocols for the acquisition, "Dispersive Certainty" can be established only for those

Sample Identification
LEI-3
SA33697-03

Client Project #
1694

Matrix
Ground Water

Collection Date/Time
06-Sep-05 13:10

Received
07-Sep-05

CAS No.	Analyte(s)	Result	*RDL/Units	Dilution	Method Ref.	Prepared	Analyzed	Batch	Analyst	Flag
Volatile Organic Compounds										
<u>VPPI Aliphatic/Aromatic Carbon Ranges</u>			Prepared by method		VPPI					
	C5-C8 Aliphatic Hydrocarbons	0.298	0.0750 mg/l	5	+MADEP 5/2004 Rev. 1.1	09-Sep-05	09-Sep-05	5090531	SS	
	C9-C12 Aliphatic Hydrocarbons	0.481	0.0250 mg/l	5	"	"	"	"	"	
	C9-C10 Aromatic Hydrocarbons	0.562	0.0250 mg/l	5	"	"	"	"	"	
	Unadjusted C5-C8 Aliphatic Hydrocarbons	0.347	0.0750 mg/l	5	"	"	"	"	"	
	Unadjusted C9-C12 Aliphatic Hydrocarbons	1.04	0.0250 mg/l	5	"	"	"	"	"	
<u>VPPI Target Analytes</u>			Prepared by method		VPPI					
71-43-2	Benzene	BRL	5.0 µg/l	5	"	"	"	"	"	
100-41-4	Ethylbenzene	BRL	5.0 µg/l	5	"	"	"	"	"	
1634-04-4	Methyl tert-butyl ether	45.7	5.0 µg/l	5	"	"	"	"	"	
91-20-3	Naphthalene	15.2	5.0 µg/l	5	"	"	"	"	"	
108-88-3	Toluene	BRL	5.0 µg/l	5	"	"	"	"	"	
1330-20-7	m,p-Xylene	BRL	10.0 µg/l	5	"	"	"	"	"	
95-47-6	o-Xylene	BRL	5.0 µg/l	5	"	"	"	"	"	
<u>Surrogate recoveries:</u>										
615-59-8	2,5-Dibromotoluene (FID)	113	70-130 %		"	"	"	"	"	
615-59-8	2,5-Dibromotoluene (PID)	98.8	70-130 %		"	"	"	"	"	

This laboratory report is not valid without an authorized signature on the cover page.

* Reportable Detection Limit BRL = Below Reporting Limit

Sample Identification
LEI-4
SA33697-04

Client Project #
1694

Matrix
Ground Water

Collection Date/Time
06-Sep-05 12:55

Received
07-Sep-05

SA33697-04

CAS No.	Analyte(s)	Result	*RDL/Units	Dilution	Method Ref.	Prepared	Analyzed	Batch	Analyst	Flag
Volatile Organic Compounds										
<u>VPH Aliphatic/Aromatic Carbon Ranges</u>			Prepared by method	VPH						PH
	C5-C8 Aliphatic Hydrocarbons	BRL	0.0750 mg/l	5	+MADEP 5/2004 Rev. 1.1	09-Sep-05	09-Sep-05	5090531	SS	
	C9-C12 Aliphatic Hydrocarbons	0.402	0.0250 mg/l	5	"	"	"	"	"	
	C9-C10 Aromatic Hydrocarbons	0.378	0.0250 mg/l	5	"	"	"	"	"	
	Unadjusted C5-C8 Aliphatic Hydrocarbons	0.128	0.0750 mg/l	5	"	"	"	"	"	
	Unadjusted C9-C12 Aliphatic Hydrocarbons	0.780	0.0250 mg/l	5	"	"	"	"	"	
<u>VPH Target Analytes</u>			Prepared by method	VPH						PH
71-43-2	Benzene	BRL	5.0 µg/l	5	"	"	"	"	"	
100-41-4	Ethylbenzene	BRL	5.0 µg/l	5	"	"	"	"	"	
1634-04-4	Methyl tert-butyl ether	58.3	5.0 µg/l	5	"	"	"	"	"	
91-20-3	Naphthalene	13.1	5.0 µg/l	5	"	"	"	"	"	
108-88-3	Toluene	BRL	5.0 µg/l	5	"	"	"	"	"	
1330-20-7	m,p-Xylene	BRL	10.0 µg/l	5	"	"	"	"	"	
95-47-6	o-Xylene	BRL	5.0 µg/l	5	"	"	"	"	"	
Surrogate recoveries:										
615-59-8	2,5-Dibromotoluene (FID)	94.8	70-130 %		"	"	"	"	"	
615-59-8	2,5-Dibromotoluene (PID)	87.6	70-130 %		"	"	"	"	"	
Extractable Petroleum Hydrocarbons										
<u>EPH Aliphatic/Aromatic Ranges</u>			Prepared by method	SW846 3510C						
	C9-C18 Aliphatic Hydrocarbons	1.5	0.2 mg/l	1	+MADEP 5/2004 R	08-Sep-05	09-Sep-05	5090435	JD	
	C19-C36 Aliphatic Hydrocarbons	7.5	0.2 mg/l	1	"	"	"	"	"	
	C11-C22 Aromatic Hydrocarbons	5.3	0.2 mg/l	1	"	"	"	"	"	
	Unadjusted C11-C22 Aromatic Hydrocarbons	5.3	0.2 mg/l	1	"	"	"	"	"	
	Total Petroleum Hydrocarbons	14.2	0.2 mg/l	1	"	"	"	"	"	
	Unadjusted Total Petroleum Hydrocarbons	14.2	0.2 mg/l	1	"	"	"	"	"	
<u>EPH Target PAH Analytes</u>			Prepared by method	SW846 3510C						
91-20-3	Naphthalene	BRL	5.56 µg/l	1	"	"	"	"	"	
91-57-6	2-Methylnaphthalene	BRL	5.56 µg/l	1	"	"	"	"	"	
208-96-8	Acenaphthylene	BRL	5.56 µg/l	1	"	"	"	"	"	
83-32-9	Acenaphthene	BRL	5.56 µg/l	1	"	"	"	"	"	
86-73-7	Fluorene	BRL	5.56 µg/l	1	"	"	"	"	"	
85-01-8	Phenanthrene	BRL	5.56 µg/l	1	"	"	"	"	"	
120-12-7	Anthracene	BRL	5.56 µg/l	1	"	"	"	"	"	
206-44-0	Fluoranthene	BRL	5.56 µg/l	1	"	"	"	"	"	
129-00-0	Pyrene	BRL	5.56 µg/l	1	"	"	"	"	"	
56-55-3	Benzo (a) anthracene	BRL	5.56 µg/l	1	"	"	"	"	"	
18-01-9	Chrysene	BRL	5.56 µg/l	1	"	"	"	"	"	
205-99-2	Benzo (b) fluoranthene	BRL	5.56 µg/l	1	"	"	"	"	"	
207-08-9	Benzo (k) fluoranthene	BRL	5.56 µg/l	1	"	"	"	"	"	

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* Reportable Detection Limit

BRL = Below Reporting Limit

Sample Identification
LEI-4
SA33697-04

Client Project #
1694

Matrix
Ground Water

Collection Date/Time
06-Sep-05 12:55

Received
07-Sep-05

CAS No.	Analyte(s)	Result	*RDL/Units	Dilution	Method Ref.	Prepared	Analyzed	Batch	Analyst	Flag
Extractable Petroleum Hydrocarbons										
<u>EPH Target PAH Analytes</u>			Prepared by method SW846 3510C							
50-32-8	Benzo (a) pyrene	BRL	5.56 µg/l	1	+MADEP 5/2004 R	08-Sep-05	09-Sep-05	5090435	JD	
193-39-5	Indeno (1,2,3-cd) pyrene	BRL	5.56 µg/l	1	"	"	"	"	"	
53-70-3	Dibenzo (a,h) anthracene	BRL	5.56 µg/l	1	"	"	"	"	"	
191-24-2	Benzo (g,h,i) perylene	BRL	5.56 µg/l	1	"	"	"	"	"	
<u>Surrogate recoveries:</u>										
3386-33-2	1-Chlorooctadecane	44.2	40-140 %		"	"	"	"	"	
84-15-1	Ortho-Terphenyl	57.2	40-140 %		"	"	"	"	"	
580-13-2	2-Bromonaphthalene	66.7	40-140 %		"	"	"	"	"	
321-60-8	2-Fluorobiphenyl	63.5	40-140 %		"	"	"	"	"	

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* Reportable Detection Limit

BRL = Below Reporting Limit



SPECTRA ANALYTICAL, INC.
Pawtucket, RI 02860
TEL: 401-863-1100
FAX: 401-863-1101
WWW.SPECTRA-ANALYTICAL.COM

CHAIN OF CUSTODY RECORD

Page 1 of 1

Special Handling:
☐ Standard TAT - 7 to 10 business days
☒ Rush TAT - Due Needed: 9/19/05
All TATs subject to laboratory approval.
Min. 24-hour notification needed for rush.
Samples shipped after 60 days unless otherwise instructed.

Report To: EEKARO Environmental
308 Chester Hill Road
Danvers, MA

Invoice To: same

Project No.: 1694

Site Name: West Oaks Gas Station

Location: Methuen

State: MA

Project Mgr: Mae Seachon

P.O. No.:

RON:

Sample(s): RMW

1=Na₂SO₄ 2=HCl 3=H₂SO₄ 4=HNO₃ 5=NaOH 6=Ascorbic Acid
7=CH₃OH 8=NaHSO₄ 9=10=

DW=Drinking Water GW=Groundwater WY=Wastewater
Q=Oil SW=Surface Water SO=Soil SL=Sludge A=Air
X1= X2= X3=

G=Grab C=Composite

Lab Id.	Sample Id.	Date	Time	Type	Matrix	Preservative	# of VOA Vials	# of Amber Glass	# of Clear Glass	# of Plastic	VPH	EPH	TOTAL LEAD
LE1-1	9/16/05	1:30	9	Grab	2	2	1				X	X	
LE1-2		1:40			2	2	1				X	X	
LE1-3		1:10			2	2	1				X	X	
LE1-4		12:55			2	2	1				X	X	
LE1-8		11:15			2	2	1				X	X	

State specific reporting standards
if applicable, please list below.
* Provide MCH CAA Report
where all field QC requirements met
as per M-ADP CAN Section 2.07
* Yes ☒ No ☐
* Remote required for CAA report

☐ Fax results when available to ()
E-mail to mbracke@EEKARO.com or environmental.com

EDD Format

Received by: Paula Seachon
Date: 9/17/05 Time: 14:17

1400 Morgan Drive • Agawam, Massachusetts 01001 • 413-789-9018 • Fax 413-789-4076 • www.spectra-analytical.com

Table 4

Groundwater Analytical Data - Lead Constituents

76 Swan Street
Methuen, Massachusetts

Dates	Sample Points																	
	OW-1			LEI-2			LEI-3			LEI-4			LEI-5			LEI-6		
	Dissolved Lead (ug/l)	Total Lead (ug/l)	Tetra-ethyl Lead (ug/l)	Dissolved Lead (ug/l)	Total Lead (ug/l)	Tetra-ethyl Lead (ug/l)	Dissolved Lead (ug/l)	Total Lead (ug/l)	Tetra-ethyl Lead (ug/l)	Dissolved Lead (ug/l)	Total Lead (ug/l)	Tetra-ethyl Lead (ug/l)	Dissolved Lead (ug/l)	Total Lead (ug/l)	Tetra-ethyl Lead (ug/l)	Dissolved Lead (ug/l)	Total Lead (ug/l)	Tetra-ethyl Lead (ug/l)
May 31, 2005	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
August 31, 2005	NT	21.4	NT	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
September 6, 2005	NS	NS	NS	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	ND (<3.8)	NT	NT	NT	NT
September 16, 2005	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
December 13, 2005	NT	1.7	ND (<2)	NT	24.9	ND (<2)	NS	NS	NS	NS	NS	NS	NT	0.5	ND (<2)	NS	NS	NS
June 5, 2006 ¹	NS	NS	NS	17.8	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT
August 7, 2006	NS	NS	NS	ND (<2.5)	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT
September 20, 2006	NS	NS	NS	ND (<8)	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT
January 11, 2007	NS	NS	NS	ND (<2.5)	NT	NT	ND (<2.5)	NT	NT	ND (<2.5)	NT	NT	ND (<2.5)	NT	NT	ND (<2.5)	NT	NT
Exposure Point Concentration	NC	NC	NC	7.7	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
MCP RCGW-1 Standard	15	15	5	15	15	5	15	15	5	15	15	5	15	15	5	15	15	5
MCP Method 1 GW-3 Standard	15	15	NA	15	15	NA	15	15	NA	15	15	NA	15	15	NA	15	15	NA

Notes:

1) MCP Revisions reduced RCGW-2 standard from 30 ppb to 15 ppb.

NT = Not Tested

NC = Exposure Point Concentration was not calculated because individual event concentrations did not exceed regulatory thresholds.

NS = Not Sampled

ug/l = Micrograms per liter

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

PROJECT NARRATIVE

Frank Postma
LFR Levine-Fricke (RI)
300 Metro Center Boulevard, Suite 250
Warwick, RI 02886

RE: Richdale Methuen
ESS Laboratory Work Order Number: 0701233

This signed Certificate of Analysis is our approved release of your analytical results. These results are only representative of sample quotes received at the laboratory. ESS Laboratory expects its clients to follow all regulatory sampling guidelines. Beginning with Project Narrative, the entire report has been paginated. The ESS Laboratory Certifications sheet is the final report page. This report should not be copied except in full without the approval of the laboratory. Samples will be disposed of thirty days after the final report is been mailed. If you have any questions or concerns, please feel free to call our Customer Service Department.



Laurel Stoddard
Laboratory Director

Date: January 24, 2007

Sample Receipt

6 Ground Water samples were received on January 15, 2007 for the analyses specified on the enclosed Chain of Custody Record.

Analytical Summary

The project as described above has been analyzed in accordance with the ESS Quality Assurance Plan. This plan utilizes the following methodologies: US EPA SW-846, US EPA Methods for Chemical Analysis of Water and Wastes per 40 CFR Part 136, APHA Standard methods for the Examination of Water and Wastewater, American Society for Testing and Materials (ASTM), and other recognized methodologies. The analyses with these noted observations are in conformance to the Quality Assurance Plan. In chromatographic analysis, manual integration may be used instead of automated integration because it produces more accurate results.

ESS Laboratory certifies that the test results meet the requirements of NELAP, except where noted within this project narrative. Holding time and preservation requirements for all MCP analytes were achieved, unless otherwise noted in this Project Narrative.

No unusual observations noted.

3 of Project Narrative.

mdp

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: LFR Levine-Fricke (RI)
Client Project ID: Richdale Methuen

ESS Laboratory Work Order: 0701233

MADEP MCP Response Action Analytical Report Certification Form

MADEP RTN*: _____

This form provides certification for the following data set:

0701233-01, 0701233-02, 0701233-03, 0701233-04, 0701233-05, 0701233-06

Sample Matrices:	☒ Ground Water	☐ Soil/Sediment	☐ Drinking Water	☐ Other:
ACP SW-846	8260B ()	8151A ()	8330 ()	6010B () 7470A/1A ()
Methods Used	8270C ()	8081A ()	VPH ()	6020 () 9014M** ()
	8082 ()	8021B ()	EPH ()	7000 S*** (X) 7196A ()

As specified in MADEP
Compendium of Analytical
Methods (Check all that apply)

* List Release Tracking Number (RTN), if known.
** M-SW-846 9014 or MADEP Physiologically Available Cyanide (PAC) Method
*** S - SW - 846 Methods 7000 Series - List individual method and analyte

An affirmative response to questions A, B, C and D is required for "Presumptive Certainty" status

- A Were all samples received by the laboratory in a condition consistent with that described on the Chain-of-Custody documentation for the data set? (Yes) No*
- B Were all QA/QC procedures required for the specified analytical method(s) included in this report followed, including the requirement to note and discuss in a narrative QC data that did not meet appropriate performance standards or guidelines? (Yes) No*
- C Does the data included in the report meet all the requirements for "Presumptive Certainty" as described in Section 2.0 (a), (b), (c) and (d) of the MADEP document CAM VII A, "Quality Assurance and Quality Control Guidelines for the Acquisition and Reporting of Analytical Data"? (Yes) No*
- D VPH and EPH methods only: Was the VPH and EPH method conducted without significant modifications (see Section 11.3 of respective Methods)? (Yes) No*

A response to questions E and F below required for "Presumptive Certainty" status

- E Were all QC performance standards and recommendations for the specific methods achieved? (Yes) No*
- F Were results for all analyte-list compounds/elements for the specified method(s) reported? Yes (No*)

**All negative responses must be addressed in an attached Environmental Laboratory Case Narrative.*

I, the undersigned, attest under the pains and penalties of perjury that, based upon my personal inquiry of those responsible for obtaining the information, the material contained in this analytical report is, to the best of my knowledge and belief, accurate and complete.

Signature: Laurel Stoddard

Date: 1/25/2007

Printed Name: Laurel Stoddard

Position: Laboratory Director

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: LFR Levine-Fricke (RI)
Client Project ID: Richdale Methuen
Client Sample ID: LE1-4
Date Sampled: 01/11/07 13:00
Percent Solids: N/A

ESS Laboratory Work Order: 0701233
ESS Laboratory Sample ID: 0701233-05
Sample Matrix: Ground Water

3005A/6000/7000 Total Metals

Analyte

Lead

Results
ND

Units
ug/L

MRL
2.5

GW2 Limit

Method
7421

DF
1

Analyst
JP

Analyzed
01/17/07

I/V F/
100 5