



U.S. Army Corps of Engineers

New England Division

Waltham, Massachusetts

## BUILDING 1634 TRANSFORMER AREA REQUIRING ENVIRONMENTAL EVALUATION (AREE) 66B DEVENS, MASSACHUSETTS

Contract/Purchase Order No. DACW33-95-D-0004

Final No Further Action Decision Document Delivery Order No. 0004 DCN: VRA-041996-AABE

April 1996

Revealed on recycled paper



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#### NO FURTHER ACTION DECISION DOCUMENT AREA REQUIRING ENVIRONMENTAL EVALUATION 66B FORT DEVENS, MASSACHUSETTS

#### Contract/Purchase Order No. DACW33-95-D-0004 Delivery Order No. 0004 DCN: VAR-041996-AABE

Prepared for

#### U.S. ARMY CORPS OF ENGINEERS NEW ENGLAND DIVISION 424 Trapelo Road Waltham, Massachusetts 02554-9149

Prepared by

ROY F. WESTON, INC. Suite B125 187 Ballardvale Street Wilmington, Massachusetts 01887

April 23, 1996

Work Order No. 03886-118-004-0292-00



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#### EXECUTIVE SUMMARY

This document has been prepared to support a no further action decision at the Area Requiring Environmental Evaluation 66B (AREE 66B). AREE 66B was identified as an area of exposed soil that had come into contact with polychlorinated biphenyl (PCB) contaminated transformer oil.

On December 21, 1989, Fort Devens was placed on the National Priorities List (NPL) pursuant to the Comprehensive Environmental Response and Compensation Liability Act (CERCLA) of 1980, as amended. Fort Devens is located within the towns of Ayer, Harvard, Lancaster, and Shirley, Massachusetts and consists of approximately 9,280 acres. Fort Devens was used for a variety of U.S. military training missions from 1917 until 1990 when the base was selected for cessation of operations and closure under Public Law 101-50, the Base Realignment and Closure (BRAC) Act of 1990.

AREE 66B is located in the northeastern portion of the Main Post of Fort Devens. Two side by side utility poles are located on the northern side of Chattanooga Street, adjacent to the former location of Building 1634. The transformer was reported to be leaking with electrolyte oil contacting the ground. The concentration of the PCBs in the electrolyte oil was not recorded on the initial spill report; however, the transformer and an unknown quantity of soil from around the base of the utility pole were removed. The date at which the transformer was removed was not indicated. The impacted area was suspected to be the area immediately adjacent to the storm drain manhole located next to the side by side utility poles.

In 1993, the U.S. Army Reserve Center contracted Arthur D. Little (ADL) to conduct the BRAC Environmental Evaluation (EE) for AREE 66. During the BRAC EE, a list of damaged and/or leaking transformers were generated from a database compiled during transformer surveys in 1982 and 1990 by the Fort Devens Facility Engineering Support Activity. A total of nine leaking/damaged transformers were identified in AREE 66. Six of these locations were recommended for soil sampling and included AREE 66B.

On March 28 and 29, 1996, Roy F. Weston, Inc. (WESTON®) performed a time-critical removal action at AREE 66B which included the removal of approximately two tons of PCB contaminated soil from the areas surrounding the former location of the transformer. Prior to removal activities, the area of suspected PCB contaminated soil was field screened in order to delineate the extent of contamination. After removal activities were completed three confirmatory field screen samples were collected to ensure that PCB containing soils were no longer present. In addition, two composite soil samples were obtained from the floor and walls of the excavation and were submitted for confirmatory laboratory analysis for PCBs. Analytical results indicated PCB concentrations less than the Massachusetts Contingency Plan (MCP) Method 1 S-1/GW-1 standard of 2 parts per million (ppm).

The removal action was consistent with the National Contingency Plan and site conditions met the criteria (40 CFR 300.415) for removal action. The removal action was performed to enhance public welfare and to provide a permanent, long term solution for the site. The removal action involved the excavation of approximately two tons of PCB-contaminated soil from the area surrounding the former location of the a transformer.



No further action is recommended for AREE 66B. This recommendation is based on laboratory analytical results of confirmatory soil samples which indicate PCB concentrations at AREE 66B to be less than the MCP standard of 2 ppm. The soil removal action provided a permanent, long term solution for the site and eliminated the threat to public welfare that was proposed by the presence of the PCB contaminated soil. The decision has been made to remove AREE 66B from further consideration in the Installation Restoration Program process.

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#### PURPOSE

The purpose of this document is to support a no further action decision at the Area Requiring Environmental Evaluation 66B (AREE 66B) in accordance with the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) of 1980, as amended. Removal actions involved the excavation and off-site removal of an estimated two tons of polychlorinated biphenyl (PCB) contaminated soil associated with a former leaking transformer. This No Further Action Decision Document was prepared in accordance with the Roy F. Weston, Inc. (WESTON®) Action Memorandum dated March 19, 1996 and the references incorporated within.



#### BACKGROUND AND PHYSICAL SETTING

#### 2.1 SITE DESCRIPTION AND HISTORY

On December 21, 1989, Fort Devens was placed on the National Priorities List (NPL) pursuant to the CERCLA as amended. Fort Devens is located within the towns of Ayer, Harvard, Lancaster, and Shirley, Massachusetts and consists of approximately 9,280 acres (Figure 1). Fort Devens was used for a variety of U.S. military training missions from 1917 until 1990 when the base was selected for cessation of operations and closure under Public Law 101-50, the Base Realignment and Closure (BRAC) Act of 1990.

AREE 66B is located in the northeastern portion of the Main Post of Fort Devens. Two side by side utility poles are located on the northern side of Chattanooga Street, adjacent to the former location of Building 1634. The transformer was reported to be leaking with electrolyte oil contacting the ground. The concentration of the PCBs in the electrolyte oil was not recorded on the initial spill report; however, the transformer and an unknown quantity of soil from around the base of the utility pole were removed at the time the transformer was discovered to have been leaking. The date at which the transformer was removed was not indicated. The impacted area was suspected to be the area immediately adjacent to the storm drain manhole located next to the side by side utility poles (Figure 2).

#### 2.2 **REGIONAL GEOLOGY**

Fort Devens is near the western boundary of the Seaboard Lowland Section of the New England Maritime Physiographic province (Jahns, 1953). It is adjacent to the Worcester County Plateau of the Central Uplands province, and part of the installation lies within the province (Koteff, 1966). The land surface is almost completely covered with unconsolidated glacial outwash deposits, resulting in few bedrock outcrops. The surficial deposits are underlain by a highly complex assemblage of intensely folded and faulted metsedimentary rocks and occasional igneous intrusions. The geomorphology of the region is dominated by glacial features such as outwash plains, kames, kames terraces, drumlins, and eskers.

#### 2.3 **REGIONAL HYDROGEOLOGY**

Groundwater at Fort Devens occurs largely in the permeable glacial-deltaic outwash deposits of sand, gravel, and boulders. Well yields within these sediments are dependent upon hydraulic characteristics of the aquifer and can range from 2 to over 300 gallons per minute (gpm). Small amounts of groundwater can be obtained from fractured bedrock with yields ranging from 2 to 10 gpm. Minor amounts of groundwater may be found in thin, permeable glacial lenses elsewhere on the installation. The primary hydrogeologic feature at Fort Devens is the Nashua River, which flows through the installation in a south to north direction with an average discharge rate of 55 cubic feet per second (ft<sup>3</sup>/s). In addition to the Nashua River, numerous brooks that are associated with attendant wetlands dissect the terrain. There are also several kettle ponds and one kettle lake located within the installation.

04/23/96



#### 2.4 **PREVIOUS INVESTIGATIONS**

In 1982, the Fort Devens Facility Engineering Support Activity completed a basewide transformer study, in order to comply with the Toxic Substance Control Act of 1979 (TSCA). During the study, a total of 900 transformers were identified, 100 of which were designated as containing PCBs. Transformers containing PCBs with concentrations greater than 500 parts per million (ppm) are designated as a PCB transformer. Transformers with PCB concentrations ranging between 50 ppm to 500 ppm are designated as PCB contaminated. Non-PCB transformers contain concentrations less than 50 ppm. Each transformer identified was given a unique number and was included in the transformer database; however the transformer number for the former AREE 66B leaking transformer is not known.

In 1990, a comprehensive inventory and inspection of transformers was conducted. The inspection included the collection of oil samples from the transformers in order to determine PCB content. Following the 1990 survey, Fort Devens PCB policy required the replacement of all transformers containing oil with a PCB concentration greater than 500 ppm. The last such transformer was replaced in the summer of 1993. Also, since the 1990 survey, Fort Devens initiated quarterly inspections of all transformers with PCB-containing oil. In addition, the Fort Devens Environmental Management Office (EMO) initiated a program to replace all PCB-contaminated transformers (50 ppm to 500 ppm PCBs). In 1994, all PCB contaminated transformers at Fort Devens were replaced.

In 1993, Arthur D. Little, Inc. (ADL) collected three surface soil samples from locations around the utility pole on which the leaking transformer had formerly been mounted (Figure 2). Currently there are two utility poles located side by side at this location and the most recent transformer was removed prior to razing of the surrounding buildings in March 1996. Samples with detectable concentrations of PCBs were compared with the Massachusetts Contingency Plan (MCP) Method 1 S-1/GW-1 standard of 2 ppm for total PCBs. Of the three locations sampled, one soil sample (TRS-93-02B) contained PCB Aroclor 1260 in excess of the MCP standard at a concentration of 3.5 ppm. Laboratory analysis of the other two soil samples (TRS-93-02A and TRS-93-02C) indicated concentrations of non-detect and 0.682 ppm, respectively.

#### 2.5 SOIL REMOVAL ACTION

Based on the elevated PCB concentration detected by ADL during the 1993 AREE 66B Study, WESTON returned to the site in March 1996 to perform a time-critical removal action of remaining PCB contaminated soils. Operations conducted by WESTON included an initial field screening of suspected PCB-contaminated soil areas utilizing a D-Tech PCB kit to delineate the extent of surficial soil contamination. A total of four field screening samples (SS-1 to SS-4) were collected approximately five feet from the two utility poles around the area of suspected contamination and yielded PCB concentrations less than 1 ppm (Figure 2). The area within the perimeter, consisting of approximately 50 ft<sup>2</sup>, was subsequently excavated and drummed. In all, approximately two tons of topsoil was excavated utilizing a rubber tire backhoe, to a maximum depth of six inches, and placed in six 55-gallon drums for off-site removal to the Soil Storage Facility at Fort Devens. An additional three field screen samples (SS-5 to SS-7) were performed on the floor of the excavation, approximately three feet from the former utility poles, after the six inches of surficial soil were removed. These samples were collected in order to ensure that



PCB contaminated soils were no longer present (Figure 2). PCB concentrations were indicated to be less than 1 ppm for all three confirmatory samples. Two composite soil samples (66B-1 and 66B-2) were collected from the floor and walls of the excavation and submitted to Katahdin Analytical Services, Inc. for confirmatory analysis for PCBs using EPA Method 8080 (Figure 2). The highest PCB concentrations detected were of Aroclor 1260 at 0.310 ppm and 0.100 ppm in soil samples 66B-1 and 66B-2, respectively. Total PCB concentrations for the two confirmatory soil samples submitted for laboratory analysis were less than the MCP standard of 2 ppm. Complete analytical results of the WESTON soil samples are presented in Attachment A.

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#### **CONCLUSIONS**

No further action is recommended for AREE 66B. This recommendation is based on laboratory analytical results of confirmatory soil samples which indicate PCB concentrations at AREE 66B to be less than the MCP Method 1 S-1/GW-1 standard of 2 ppm. The soil removal action provided a permanent, long term solution for the site and eliminated the threat to public welfare that was proposed by the presence of the PCB contaminated soil. The decision has been made to remove AREE 66B from further consideration in the Installation Restoration Program process. In accordance with CERCLA 120 (h)(3), all necessary remedial actions have been performed and U.S. Environmental Protection Agency and Massachusetts Department of Environmental Protection signatures constitute concurrence in accordance with the same.

C. CHAMBERS BRAC Environmental Coordinator

24 APR 96

U.S. ENVIRONMENTAL PROTECTION AGENCY

AES P. BYR Fort Devens Remedial Manager

4/26/96

Date

Concur

£ 1. Nonconcur (Please provide reasons for nonconcurrence in writing)

MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION

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D. LYNNE/WALSH Section Chief, Federal Facilities Central Regional Office

Concur

[] Nonconcur (Please provide reasons for nonconcurrence in writing)



#### REFERENCES

WESTON (Roy F. Weston, Inc.). 1996. Area Requiring Environmental Evaluation 66B Action Memorandum. March 19.

ADL (Arthur D. Little, Inc.). 1995. Final Transformer Study (AREE 66). September.

Johns, R. H. 1953. Surficial Geology of the Ayer Quadrangle, Massachusetts; Scale 1:31, 680; U.S. Geological Survey.

Koteff, C. 1966. Surficial Geologic Map of the Clinton Quadrangle, Worcester County, Massachusetts; U.S. Geologic Survey Map GQ-567.

KATAHDIN (Katahdin Analytical Services, Inc.). 1996. Preliminary Report of Analytical Results. April 8.

USGS (U.S. Geological Survey). 1966. Ayer, Massachusetts Quadrangle, 7.5-Minute Series Topographic Map. Photorevised 1979.

1016101 101610 **FIGURES** 

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#### ATTACHMENT A

#### AREE 66B

#### CONFIRMATORY SOIL SAMPLE ANALYTICAL RESULTS ROY F. WESTON, INC.

Samples collected March 29, 1996



April 11, 1996

Mr. John Lovely Roy F. Weston, Inc. 7 Eagle Square Concord, NH 03301-4991

RECET 3011000

CONCORD CHARLE

RE: Katahdin Lab Number: WM0584 Project ID: NA Project Manager: Mr. Richard L. Wellman Sample Receipt Date: March 30, 1996

Dear Mr. Lovely:

Please find enclosed the following information:

- \* Report of Analysis
- \* Quality Control Sample Data
- \* Confirmation
- \* Chain of Custody

Effective November 22, Katahdin Analytical Services completed acquistion of the PACE-ME and PACE-NH facilities. You will see the new company name reflected on our new letterhead. In the interim, until such time as all our systems are changed, some supporting documentation will show PACE, Inc. All other aspects of our local operations will remain the same.

Your patience during this transition is appreciated. Should you have any questions or comments concerning this Report of Analysis, please do not hesitate to contact the project manager listed above. This cover letter is an integral part of the ROA.

We appreciate your continued use of our laboratory and look forward to working with you in the future. The following signature indicates technical review and acceptance of the data.

Sincerely,

KATAMDIN ANALYTICAL SERVICES

man Authorized Signature

4/11/96 Date

Country Road No. 5



CLIENT: JOHN LOVELY ROY F. WESTON, INC. 7 EAGLE SQUARE CONCORD, NH 03301-4991 Lab Number : WM-0584-1 Report Date: 04/11/96 PO No. : 03886-118-004-0204

	REPORT OF ANALYTICAL RESULTS						Page	1 of	4
SAMPLE DESCRIPTION		MATRIX		SAMPL	ed by		SAMPLED	DATE	RECEI
662-1		Solid		CLIEN	r		03/29/	<sup>′</sup> 96	03/30
PARAMETER	RESULT	UNITS	DF	*PQL	METHOD		ANALYZEL	) BY	N
Solids-Total Residue (TS)	90.	wt ł	1.0	0.10	CT5/CIP	SCW	04/04/96	3TF	

\* FQL (Practical Quantitation Level) represents laboratory reporting limits and may not reflect same specific reporting limits. Sample-specific limits are indicated by results annotated with '<' val (1) Sample Preparation on 04/03/96 by JF

04/11/96

LJO/ejnejn

CCCCC



CLIENT: JOHN LOVELY ROY F. WESTON, INC. 7 EAGLE SQUARE CONCORD, NH 03301-4991 Lab Number : WM-0584-1 Report Date: 04/11/96 PC No. : 03886-118-004-0204

	REPORT OF	ANALYTICAL	IIIS		Page	2 of	4	
SAMPLE DESCRIPTION		MATRIX		SAMPLED	by	SAMPLED	DATE	RECEIVEI
668-1		Sclid		CLIENT		03/29/	96	03/30/96
Parameter	RESULT	UNITS	DF	*PQL	METHOD	ANALYZED	ЗY	NOT
PCBs only by USEPA 8080								
PCB-1016	<19.	µg/kgdrywt	1.1	17	EPA 8080	04/03/96	SW	
PCB-1221	<36.	µg/kgdrywt	1.1	33	EPA 8080	04/03/96	SW	
PCB-1232	<19.	µg/kgdrywt	1.1	17	SPA 8080	04/03/96	SW	
PCB-1242	<19.	µg/kgdrywc	1.1	17	EPA 8080	04/03/96	SW	
PCB-1248	<19.	µg/kgdrywt	1.1	17	EPA 8080	04/03/96	SW	
PCB-1254	<19.	ug/kgdrywc	1.1	17	EPA 8080	04/03/96	SW	
PCB-1260	310.	µg/kgdrywt	1.1	17	EPA 3080	04/03/96	SW	
2,4,5,6-Tetrachloro-meta-xylene (%	90.	*	1.1		<b>SPA 3080</b>	04/03/96	SW	
Decachlorobiphenyl (* Recovery)	121.	3	1.1		EPA 8080	04/03/96	SW	

\* PQL (Practical Quantitation Level) represents laboratory reporting limits and may not reflect sample specific reporting limits. Sample-specific limits are indicated by results annotated with '<' value (1) Sample Preparation on 04/01/96 by BWG using EFA 3550A</li>

04/11/96

LJO/jcbajc(dw)/sw





CLIENT: JCHN LOVELY ROY F. WESTON, INC. 7 EAGLE SQUARE CONCORD, NH 03301-4991 Lab Number : WM-0584-2 Report Date: 04/11/96 PO Nc. : 03886-118-004-0204

	REPORT OF	ANALYTT	CAL R	SULTS			Page	3 of	4
SAMPLE DESCRIPTION		MAIRIX		SAMPL	ed by		SAMPLED	DATE	RECEI
668-2		Solid		CLIEN	т		03/29/	96	03/30
Parameter	RESULT	UNITS	DF	*PQL	METHOD		ANALYZED	BY	N
Solids-Total Residue (TS)	90.	wt f	1.0	0.10	CLP/CIP	SOW	04/04/96	ਹੁੰਝ	

 \* FQL (Practical Quantitation Level) represents laboratory reporting limits and may not reflect sam specific reporting limits. Sample-specific limits are indicated by results annotated with '<' val (1) Sample Preparation on 04/03/96 by JF

1. SH

04/11/96

LJO/ejnejn

CCCC



CLIENT: JOHN LOVELY ROY F. WESTON, INC. 7 EAGLE SQUARE CONCORD, NH 03301-4991 Lab Number : WM-0584-2 Report Date: 04/11/96 PO No. : 03886-118-004-0204

2	REPORT OF	ANALYTICAL	RESC	lits		2age	7 OL	4
SAMPLE DESCRIPTION		MATRIX		SAMPLED	BY	SAMPLED	DATE	RECEIVE
663-2		Solid		CLIENT		03/29/	96	03/30/9
PARAMETER	RESULT	UNETS	DF	-PQL	METHOD	ANALYZED	BA	NOI
PCBs only by USEPA 8080								
PCB-1016	<19.	ug/kgdrywt	1.1	17	EPA 3080	04/03/96	SW	
PCB-1221	<36.	ug/kgdrywc	1.1	33	EPA 3080	04/03/96	SW	
PCB-1232	<19.	µg/kgarywc	1.1	17	EPA 8080	04/03/96	SW	
PCB-1242	<19.	µg/kgdrywt	1.1	17	EPA 8080	04/03/96	SW	
PCB-1248	<19.	µg/kgarvwt	1.1	17	EPA 8080	04/03/96	SW	
PCB-1254	<19.	µg/kgdrywt	1.1	17	EPA 3080	04/03/96	SW	
PCB-1260	100.	µg/kgdrywt	1.1	17	EPA 8080	04/03/96	SW	
2,4,5,6-Tetrachloro-meta-xylene (%	97.	*	1.1		EPA 8080	04/03/96	SW	
Decachlorobiphenyl (* Recovery)	104.	\$	1.1		EPA 8080	04/03/96	SW	

\* FQL (Practical Quantitation Level) represents laboratory reporting limits and may not reflect sample specific reporting limits. Sample-specific limits are indicated by results annotated with '<' value (1) Sample Preparation on 04/01/96 by EWG using EPA 3550A

04/11/96

LJO/jcbajc(dw)/sw

4/8/96

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## Katahdin Analytical Services, Inc. Quality Control Report

Method Blank and Laboratory Control Sample Results

Client: Roy F. Weston, Inc.	
Work Order: WM0584	

#### METHOD BLANK RESULTS

#### LABORATORY CONTROL SAMPLE RESULTS

	Date	Date	(8)	Con	centratio	on		Practical		Тгие	Measured	Percent	Acceptance	Acceptance
	of	of	Units	M	leasured	1	Acceptance	Quantitation	Units	Value	Value	Recovered	Range	Range
Parameter	Prep	Analysis		i	n Blank		Range	Level**					(%)	(mg/kg)
TS -Total Residue	03-Apr-96	04-Apr-96	wt %	<	0.10	<	0.10	0.10						

\*\* Practical quantitation level is the lowest concentration measurable for samples with normal chemical and physical composition during routine laboratory operations.

#### DATA QUALITY COMMENTS:

8

Results of all quality control measurements are within the laboratory and method specified acceptance range except as noted.

## KATAHDIN ANALYTICAL SERVICES Quality Control Report

#### Methods, Chronology of Analysis and Method Blank Results

PCBs by GC Method: Sample Preparation Technique:

8080 3550

Soil/Solid Matrix

#### CHRONOLOGY

KATAHDIN Sample Nos.	Date Extracted	Date Analyzed	LCS File	Dilution Factor~	KATAIIDIN Sample Nos.	Date Extracted	Date Analyzed	LCS File	Dilution Factor~
WM0584-1	4/1/96	4/3/96	apla017	1.0					
WM0584-2	4/1/96	4/3/96	apla017	1.0					
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					the state of the second state of				
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#### **METHOD BLANK RESULTS\***

Compound	Conc. (ug/kg)

\* Only positive hits have been included. The remaining compounds were below the laboratory Practical Quantitation Levels.

The Dilution Factor (DF) indicates whether a sample, prepared in accordance with the analytical method protocol, was diluted prior to analysis.
The Dilution Factor could also indicate that a smaller aliquot than specified in the method was utilized for sample preparation and analysis.
For example, a dilution factor of 5 means that the sample was effectively diluted by a factor of 5 prior to analysis, i.e., the sample was analyzed at 20% its reported concentration. DF does not infcude the correction factor for conversion to dry weight.

#### Laboratory Control Sample Results PCBs by GC Method: 8080 Sample Preparation Technique: 3550 Soil/Solid Matrix Date of Extraction: 4/1/96 Sample: LCP0024 AP1A017 4/3/96 File id: Date of Analysis: 1.05 LCS Dup. LCS LCS Dup. Recovery Spike Measured Measured % RPD \* Acceptance Acceptance Compound Range (%)\* Units Conc. Conc. Canc Recovery Recovery Range (%)\* (%) 101.6 Arochlor 1254 169.3 NA 0-28 ug/kg 167 NA NA 39-115

 The laboratory has established the following acceptance criteria for the laboratory control sample/laboratory control sample duplicate (LCS/LCSD) sets employed for organic analyses. All spike recoveries must be equal to or greater than ten percent, and a minimum of ninety percent of the total number of calculated recoveries plus relative percent differences (RPDs) must be within the specified acceptance ranges.

NA = Not Applicable

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Client:

Work Order:

## KATAHDIN ANALYTICAL SERVICES **Quality Control Report**

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BPD

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340 County Road No. 5 P.O. Box 720 Westbrook, ME 04098 Tel: (207) 874-2400

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LAB USE ONLY WORK ORDER	*: WMOSS	·4 ·	•		<b>.</b>		ANA	LYSIS PI	AND	VATIV	INER 1 ES	TYPE		
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* Sample Description	Date/Time coll'd	Matrix	Filt. Y/N	No. of Cntrs.	PCL 2 A	-		4 14 14	*	÷	•	:		
66B-1	3/28/4/12:25	Soil	-	2	X				-					
668-2	3/29/16/12:27	Serl	-	2	$\bowtie$									
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Relinquished By: (Signature)	ate / Time Rec	aived By: (Si	ignature)		Relinquis	hed By:	(Signatu	ire)	Date	/ Time	Rec	eived By	: (Signa	lure)

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